



DRAFT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2020-2024

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I. Executive Summary

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

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

Fair Housing Laws

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

In addition to prohibiting discrimination based on federal laws, the State of California has enacted a number of statutes that mirror and, in certain cases, extend federal fair housing protections. The Unruh Civil Rights Act of 1959² and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges or services of all business establishments regardless of protected status. The courts have interpreted this Act to prohibit any arbitrary discrimination based in any class distinction, regardless of whether or not that basis is enumerated in the Act.

The Fair Employment and Housing Act of 1963³ is the primary state law that prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992

¹42 U.S. Code §§ 3601 et. seq.

²California Civil Code, §§ 51 and 52

³California Government Code §§ 12900-12906

brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a “mental and physical disability” and “familial status.” The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

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

The Federal protected classes include:

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

The additional State of California protected classes include:

- Age
- Ancestry
- Arbitrary discrimination
- Gender
- Gender identity
- Gender expression
- Genetic information
- Marital status
- Sexual orientation
- Source of income

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

⁴ The Fair Housing Act uses the term ‘handicap,’ however, we use the term “person with a disability,” to represent this language of the Act.

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, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor.

Within the legal framework of federal and state laws and based on the guidance provided by 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 race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

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

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

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

The City of Rancho Cucamonga affirmatively furthers fair housing choice through the preparation of this AI and annual funding of a fair housing service provider. The City is committed to providing residents and prospective residents with a range of housing opportunities free from discrimination.

B. Methodology and Citizen Participation

As required by HUD, 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 direct recipient of Community Development Block Grant (CDBG) funds, Rancho Cucamonga is required to update the A.I. every five years and to report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD following each program year. The City’s last A.I. was adopted in 2015. This A.I. is a comprehensive update of the 2015-2019 A.I., including a Fair Housing Plan for 2020-2024, covering the Consolidated Plan period of July 1, 2020 through June 30, 2024.

The purpose of this report is to identify impediments to fair and equal housing opportunities in Rancho Cucamonga. 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 Rancho Cucamonga. 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 these six chapters:

1. *Executive Summary.* This chapter provides background on “fair housing,” methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
2. *Community Characteristics.* This chapter provides a brief history of the City, a demographic profile, income profile, employment profile, housing profile, special needs housing profile and key maps to provide the baseline information necessary to form a complete understanding of the City. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined. Community profile information analyzed in this chapter includes data elements required by HUD in the online Consolidated Plan system (the eCon Planning Suite) from the 1990, 2000, and 2010 Decennial Census, 2012-2016 American Community Survey (ACS) 5-Year Estimates and the Affirmatively Furthering Fair Housing Tool (AFFH-T) data Version 4.
3. *Analysis of Private Sector Impediments.* This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.

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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 2019-2023 including specific actions to be taken to address identified impediments within designated timeframes.

Citizen Participation

The City values citizen input concerning the investment of federal funds. To solicit public participation for this A.I., the City held community meetings on September 19, 2019 and October 19, 2019. The draft A.I. was completed and made available for a 30-day public review period. The City plans to conduct a public hearing on April 15, 2020 to receive comments concerning the draft A.I.

C. Impediments and Recommendations

HUD requires the A.I. to include any identified impediments and provide recommendations to address each impediment. For the 2020-2024 planning period, there is one (1) impediment to fair housing choice, summarized below.

Discrimination Against Persons with Disabilities

According to data from the City's contracted fair housing service provider covering the most recent fiscal year, the number of fair housing discrimination complaints on the basis of disability accounted for 62 percent of all complaints. The next two closest discrimination complaint types include age and sex, each accounting for 10 percent of all complaints. Throughout the region, the state, and nationally, disability-related complaints are the leading basis of discrimination cited by residents, accounting for approximately two-thirds of all complaints in some jurisdictions, demonstrating a lack of understanding and sensitivity of the fair housing rights of persons with disabilities, who experience difficulties when requesting reasonable accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

Recommendation: The City of Rancho Cucamonga and its contracted fair housing service provider should facilitate educational opportunities for property owners, property managers, and residents in Rancho Cucamonga to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications. This initiative may be fulfilled through workshops, public service announcements, literature distribution and the provision of landlord-tenant mediation services.

II. Community Characteristics

A. Demographic Profile

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

Population Trends

Tables II-1, II-2, II-3 and II-4 below present demographic information and demographic trends both for the jurisdiction and the region. In terms of population growth from the period between 1990 and the present, the City of Rancho Cucamonga grew at nearly an identical rate to that of the region. The region saw an explosion in population of 63.2 percent within the period, with the number of area residents rising from nearly 2.6 million to over 4.2 million. The jurisdiction, similarly, saw growth of around 61.5 percent within the same period, from 102,339 in 1990 to 165,269 currently. By the latest ACS estimates (2012-2017), the population has grown 73.4 percent from 1990 to the current year, with a population of 177,452.

Age and Sex Characteristics

Table II-1 below outlines the demographic information for the city of Rancho Cucamonga, while **Table II-II** outlines the demographic information for the region. **Tables II-III** and **II-IV** represent the demographic trends for the jurisdiction and the region, respectively. In keeping with the regions trend, the jurisdiction is made up mainly of individuals between the age of 18 and 64, with a little below 67 percent of the age group making up the city of Rancho Cucamonga, while just above 61 percent of that age group makes up the region. This demographic group grew consistent with both the jurisdiction and region’s growth since 1990. The jurisdiction saw this age group increase by around 69 percent since 1990, whereas the region saw a growth rate of 67 percent.

The other two age groups, children under the age of 18 and individuals above the age of 65, experienced similar growth rates in both the jurisdiction and the region. In 1990, children under the age of 18 made up around 32 percent of Rancho Cucamonga’s residents, compared to 25 percent in the current year. For the region, children under the age of 18 made up around 30 percent of the population, compared to

28 percent in the current year. In terms of growth trends, the jurisdiction saw this group increase by around 32 percent since 1990, whereas the region saw an increase of around 58 percent. Individuals over the age of 65 represent a much smaller percentage of the population, making up around 8 percent of the jurisdiction and about 10 percent of the region. This group experienced much larger growth to the children under 18 though, as the jurisdiction saw them grow by 152 percent. The region, however, only saw growth of about 58 percent.

In terms of sex, females have historically slightly outnumbered males within the jurisdiction, albeit by a slim margin. That trend has continued during the period under review, as women currently edge out men 50.61 percent to 49.39 percent, very slightly up from 50.45 percent to 49.55 percent in 1990. This is in keeping with the regional trend, which saw women grow from 50.00 percent of the population in 1990, to 50.27 percent in the current year.

Table II-1
Demographics of Rancho Cucamonga City (Jurisdiction)

(Rancho Cucamonga, CA CDBG) Jurisdiction			
Race/Ethnicity		#	%
White, Non-Hispanic		70,572	42.70%
Black, Non-Hispanic		14,481	8.76%
Hispanic		57,679	34.90%
Asian or Pacific Islander, Non-Hispanic		17,132	10.37%
Native American, Non-Hispanic		410	0.25%
Two or More Races, Non-Hispanic		4,595	2.78%
Other, Non-Hispanic		401	0.24%
National Origin			
#1 country of origin	Mexico	7,512	4.78%
#2 country of origin	Philippines	3,649	2.32%
#3 country of origin	Korea	2,323	1.48%
#4 country of origin	India	1,914	1.22%
#5 country of origin	China excl. Hong Kong & Taiwan	1,365	0.87%
#6 country of origin	Guatemala	1,126	0.72%
#7 country of origin	Taiwan	1,001	0.64%
#8 country of origin	El Salvador	982	0.63%
#9 country of origin	Egypt	897	0.57%
#10 country of origin	Vietnam	834	0.53%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	8,834	5.62%
#2 LEP Language	Chinese	2,383	1.52%
#3 LEP Language	Korean	1,499	0.95%
#4 LEP Language	Arabic	1,033	0.66%
#5 LEP Language	Tagalog	985	0.63%
#6 LEP Language	Vietnamese	368	0.23%
#7 LEP Language	Other Asian Language	286	0.18%
#8 LEP Language	Cambodian	277	0.18%
#9 LEP Language	Thai	272	0.17%
#10 LEP Language	Other Pacific Island Language	255	0.16%
Disability Type			
Hearing difficulty		3,793	2.46%
Vision difficulty		2,483	1.61%
Cognitive difficulty		4,906	3.19%
Ambulatory difficulty		6,850	4.45%
Self-care difficulty		3,157	2.05%
Independent living difficulty		5,101	3.31%
Sex			
Male		81,619	49.39%
Female		83,650	50.61%
Age			
Under 18		42,537	25.74%
18-64		109,679	66.36%
65+		13,053	7.90%
Family Type			
Families with children		20,441	49.49%

Data Sources: Decennial Census; ACS.

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

		(Riverside-San Bernardino-Ontario, CA) Region	
Race/Ethnicity		#	%
White, Non-Hispanic		1,546,666	36.61%
Black, Non-Hispanic		301,523	7.14%
Hispanic		1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic		261,593	6.19%
Native American, Non-Hispanic		19,454	0.46%
Two or More Races, Non-Hispanic		91,476	2.17%
Other, Non-Hispanic		7,737	0.18%
National Origin			
#1 country of origin	Mexico	553,493	13.95%
#2 country of origin	Philippines	62,019	1.56%
#3 country of origin	El Salvador	30,455	0.77%
#4 country of origin	Guatemala	19,549	0.49%
#5 country of origin	Vietnam	19,525	0.49%
#6 country of origin	Korea	18,565	0.47%
#7 country of origin	India	15,522	0.39%
#8 country of origin	Canada	14,763	0.37%
#9 country of origin	China excl. Hong Kong & Taiwan	14,055	0.35%
#10 country of origin	Taiwan	9,245	0.23%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	533,544	13.45%
#2 LEP Language	Chinese	20,495	0.52%
#3 LEP Language	Tagalog	16,986	0.43%
#4 LEP Language	Vietnamese	12,570	0.32%
#5 LEP Language	Korean	11,883	0.30%
#6 LEP Language	Arabic	6,835	0.17%
#7 LEP Language	Other Pacific Island Language	5,360	0.14%
#8 LEP Language	Other Indic Language	3,125	0.08%
#9 LEP Language	Cambodian	3,117	0.08%
#10 LEP Language	Thai	2,576	0.06%
Disability Type			
Hearing difficulty		125,033	3.20%
Vision difficulty		86,934	2.23%
Cognitive difficulty		170,114	4.36%
Ambulatory difficulty		241,262	6.18%
Self-care difficulty		102,841	2.63%
Independent living difficulty		170,490	4.37%
Sex			
Male		2,101,083	49.73%
Female		2,123,768	50.27%
Age			
Under 18		1,214,696	28.75%
18-64		2,570,221	60.84%
65+		439,934	10.41%
Family Type			
Families with children		500,062	50.99%

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

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

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Table II-III
Demographic Trends of Rancho Cucamonga City (Jurisdiction)

	(Rancho Cucamonga, CA CDBG) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	68,794	67.36%	69,985	54.76%	70,572	42.70%	70,572	42.70%
Black, Non-Hispanic	5,793	5.67%	11,096	8.68%	16,157	9.78%	14,481	8.76%
Hispanic	21,471	21.02%	35,119	27.48%	57,679	34.90%	57,679	34.90%
Asian or Pacific Islander, Non-Hispanic	5,391	5.28%	9,216	7.21%	19,381	11.73%	17,132	10.37%
Native American, Non-Hispanic	441	0.43%	957	0.75%	938	0.57%	410	0.25%
National Origin								
Foreign-born	12,188	11.91%	17,621	13.79%	27,262	16.50%	32,352	19.58%
LEP								
Limited English Proficiency	6,717	6.56%	10,322	8.08%	13,305	8.05%	17,368	10.51%
Sex								
Male	50,710	49.55%	64,050	50.12%	81,619	49.39%	81,619	49.39%
Female	51,629	50.45%	63,737	49.88%	83,650	50.61%	83,650	50.61%
Age								
Under 18	32,429	31.69%	38,983	30.51%	42,537	25.74%	42,537	25.74%
18-64	64,730	63.25%	81,132	63.49%	109,679	66.36%	109,679	66.36%
65+	5,180	5.06%	7,672	6.00%	13,053	7.90%	13,053	7.90%
Family Type								
Families with children	15,923	60.52%	6,484	56.23%	20,441	49.49%	20,441	49.49%

Data Sources: Decennial Census; ACS.

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

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

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

Note 2: Data Sources: Decennial Census; ACS

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

Race and Ethnicity

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

A few generalizations can be made, based upon evaluation of the demographics and demographic trends presented in the tables above. First, the jurisdiction is less Hispanic than the region at large. Rancho Cucamonga's population is around 35 percent Hispanic, compared to 47 percent in the region as a whole. Second, the jurisdiction is more White than the region (43 percent versus 37 percent). Third, the jurisdiction has slightly more Asian or Pacific Islander residents than the region (10 percent versus 6 percent).

In terms of growth, the White population within the jurisdiction has not followed the negative growth trend of the region (though their increase has been minimal). Whereas the White population declined in the region by about 4 percent in absolute numbers between 1990 and the present, the jurisdiction saw an increase of around 2.5 percent. Non-White populations, meanwhile, have grown astronomically since 1990, including a greater than 218 percent population increase among Hispanics within the City of Rancho Cucamonga, compared to a greater than 190 percent increase in this group throughout the region.

The Asian or Pacific Islander population in both the jurisdiction and the region experienced a surge between 1990 and the present, more than doubling in size, both in terms of the percentage of the population they make up and absolute numbers.

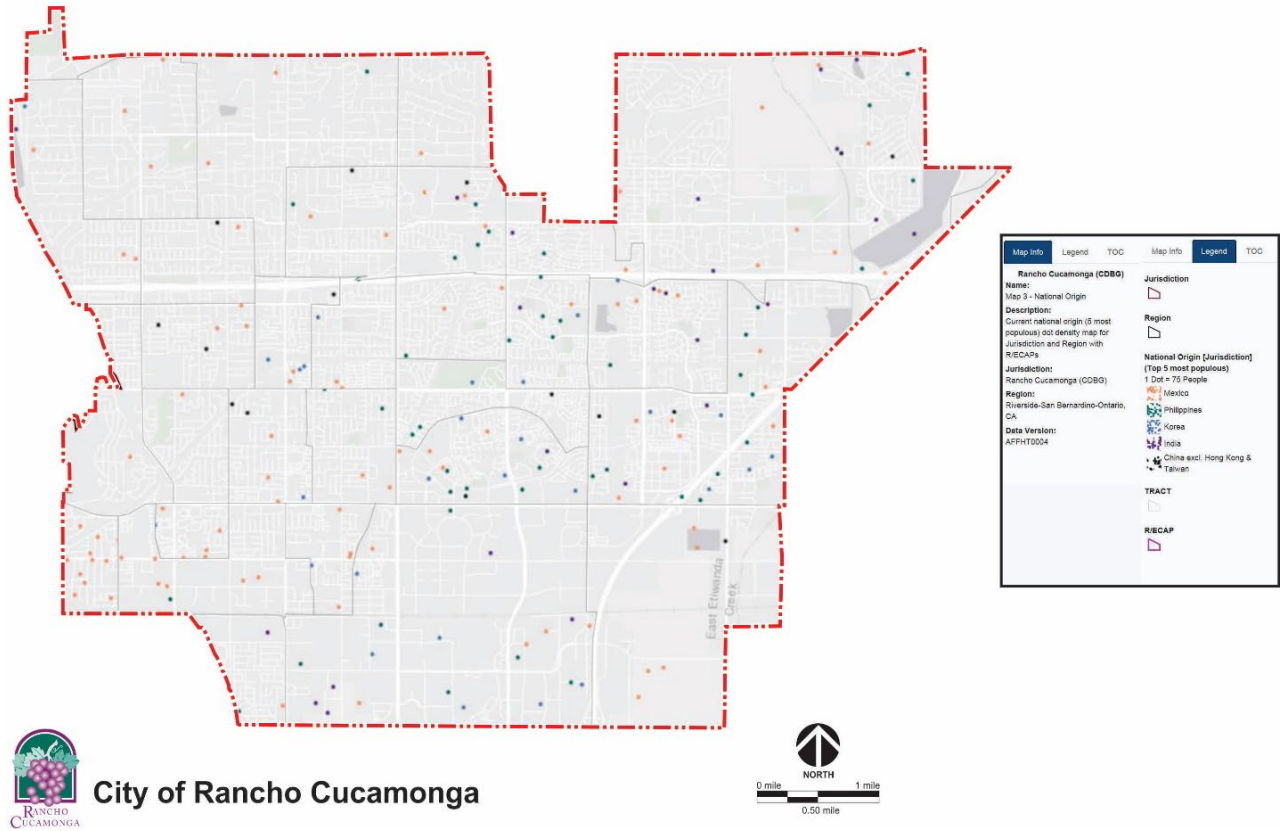
Foreign Born Population and Limited English Proficiency

In terms of national origin, the largest foreign-born population within the jurisdiction and the region is from Mexico, although at 4.78 percent of Rancho Cucamonga's residents, the proportion of this population is well below the 13.95 percent of Mexican natives who live in the region. In both the region and the jurisdiction, four of the region's ten largest groups of foreign-born nationals are from Latin America. The remaining six most populous non-native groups for the jurisdiction hail from the Philippines (second-highest), Korea (third-highest), India (fourth-highest), and China (fifth-highest), Taiwan (seventh-highest), Egypt (ninth-highest), and Vietnam (tenth-highest).

These foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Rancho Cucamonga residents with Limited English Proficiency (LEP) are among the fastest growing population subgroup, having increased their numbers a staggering 159 percent from 6,717 in 1990 to 17,368 currently. As a percent of the population, their numbers have increased from 6.7 percent to 10.5 percent. This is, however, below the regional percentage of 15.17 percent.

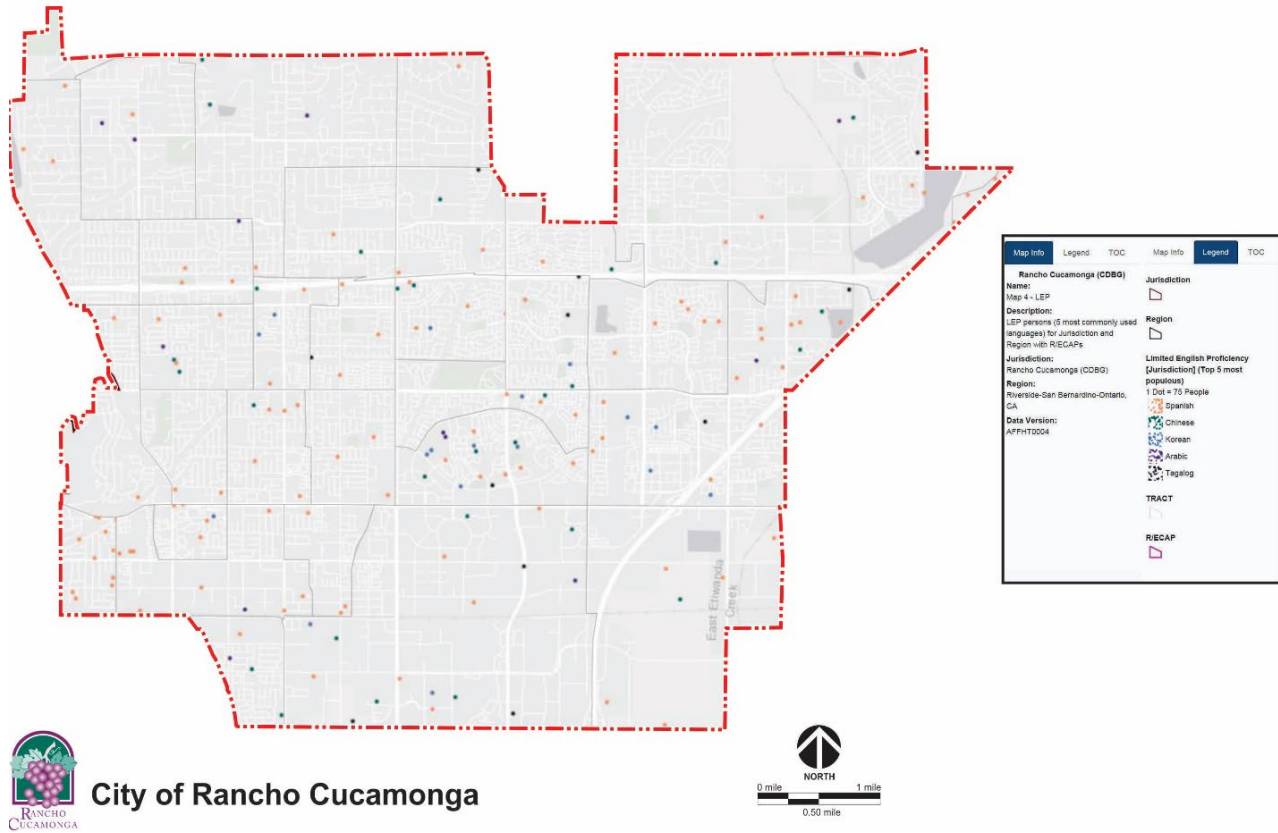
One issue that arises from such a demographic breakdown is the potential for residents to face barriers related to language proficiency. In order to visualize such an issue, consider the information detailed by **Map II-I, Map II-II, Map II-III**. Within the jurisdiction, there exists a good deal of residents who are primarily Spanish speakers and have recently immigrated from a Latin American or Asian country. In areas heavily populated by such residents, the school proficiency is generally low. These two issues combine to create a difficult situation for both first-generation children, as well as immigrants, who are attempting to assimilate into the jurisdiction as their ability to access institutions that can help them learn English is extremely limited.

Map II-I
National Origin



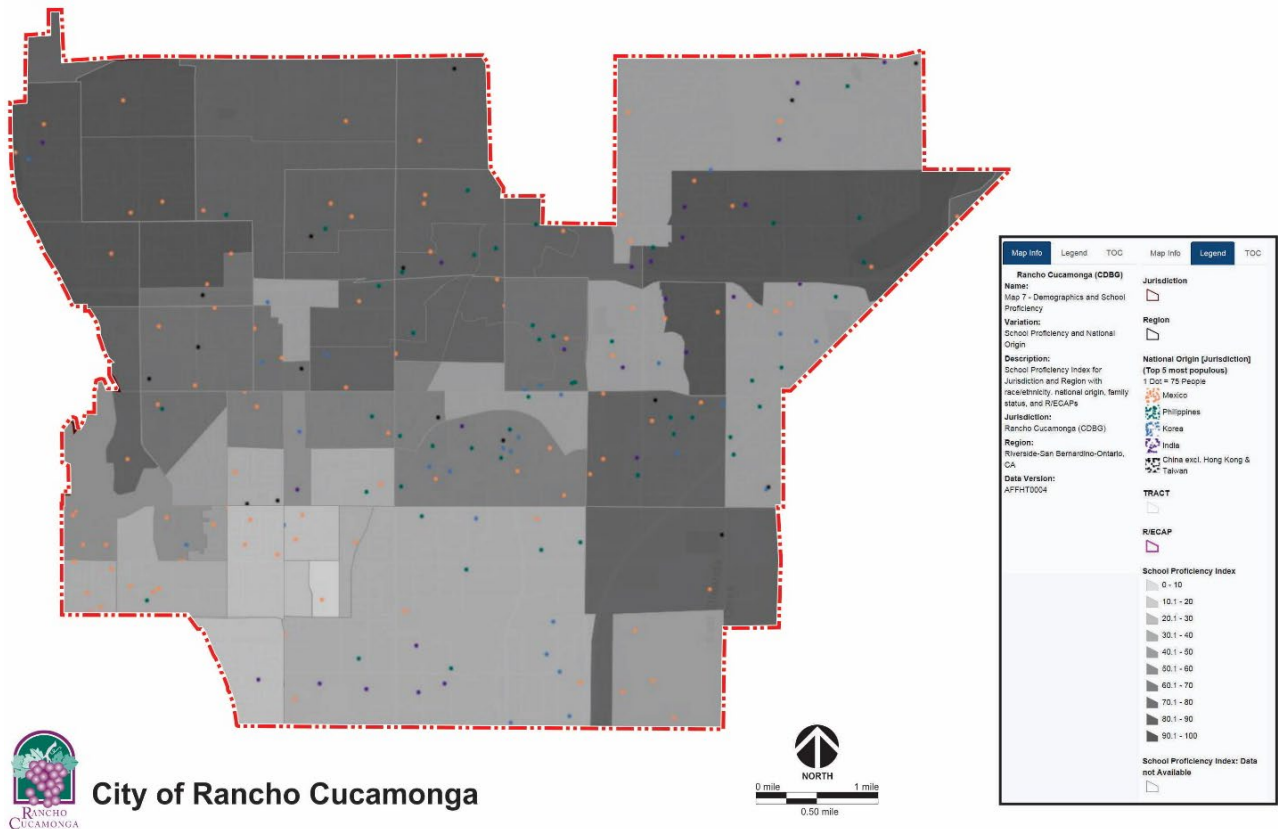
Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Map II-II
Limited English Proficiency



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Map II-III
School Proficiency



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Racial and Ethnic Integration

HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. With respect to racial and ethnic background and the extent to which a community is integrated or segregated, HUD provides the Dissimilarity Index.

Dissimilarity Index

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

The City of Rancho Cucamonga's Racial/Ethnic Dissimilarity Index shown below in **Table II-V** compares extremely favorably to the region in terms of absolute values, meaning that Rancho Cucamonga is significantly more integrated than the region overall in each of the four comparisons shown in **Table II-V**.

However, an examination of overall trends reveals a different picture. In every category, the City is trending in the direction of more, not less, segregation. With respect to Non-Whites, the level of segregation from Whites, as measured by the Dissimilarity Index, has increased by about 4 percent since 1990. By contrast, that number is much better than the regional average, which has grown by around 25 percent in that same window. This trend is even more pronounced for Black residents, as well as Asian and Pacific Islander residents, as they have experienced increased segregation by around 35 percent, compared to 9 percent and 30 percent respectively in the region. Hispanic residents are the only group that has seen a decrease in their score in the jurisdiction. Their decrease of around 6 percent is significantly better than the regional score which increased by around 31 percent.

The relative degree of integration within the City is shown in **Map II-IV** on the following pages, wherein concentrations of dots represent various racial/ethnic groups. Each racial or ethnic group is relatively evenly distributed among the Census Tracts that include population centers. Each dot represents 75 people. To compare these trends over time, **Map II-V** shows the same data, but for the year 2010.

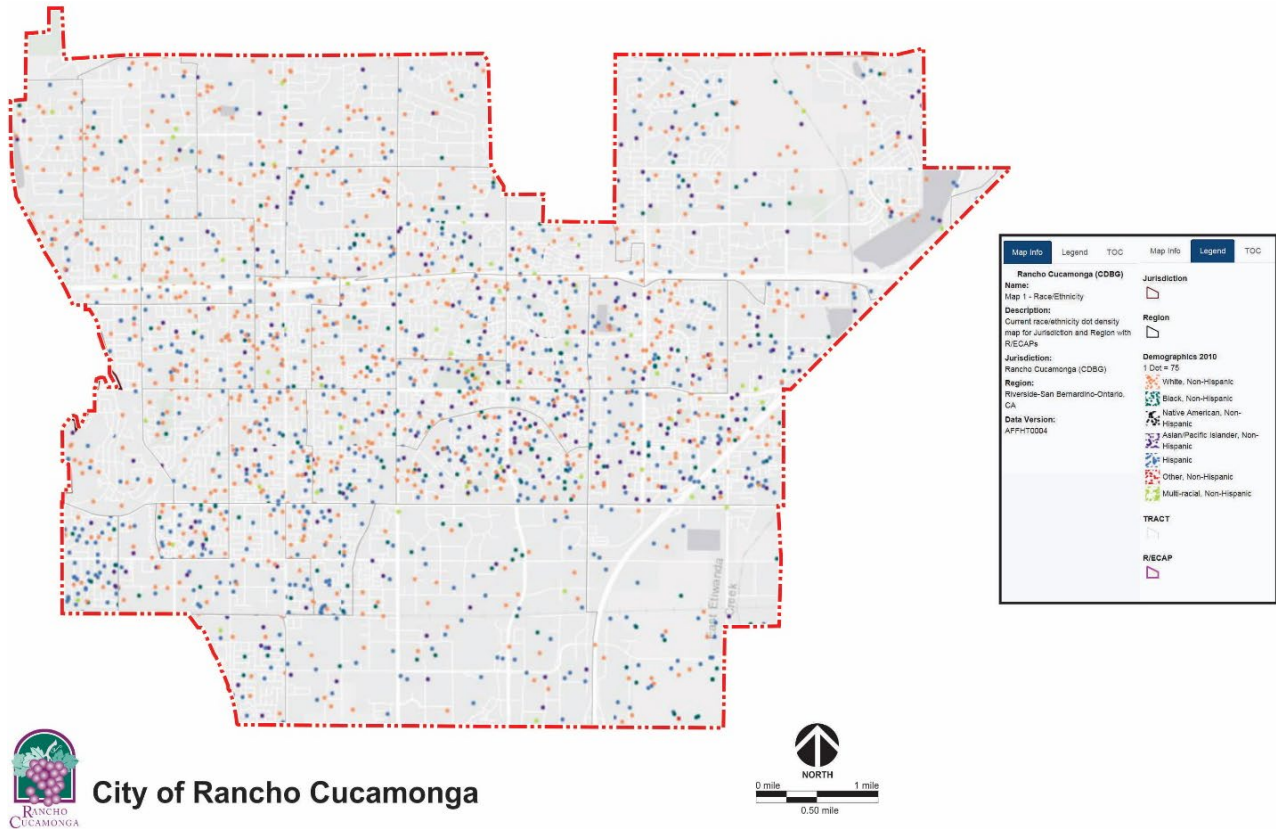
Table II-V
Racial/Ethnic Dissimilarity Trends

	(Rancho Cucamonga, CA CDBG) Jurisdiction				(Riverside-San Bernardino-Ontario, CA) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	20.53	19.37	19.32	21.25	32.92	38.90	38.95	41.29
Black/White	22.40	25.23	27.08	30.35	43.74	45.48	43.96	47.66
Hispanic/White	20.42	19.66	18.35	19.23	35.57	42.40	42.36	43.96
Asian or Pacific Islander/White	23.00	20.76	26.56	31.20	33.17	37.31	38.31	43.07

Note 1: Data Sources: Decennial Census

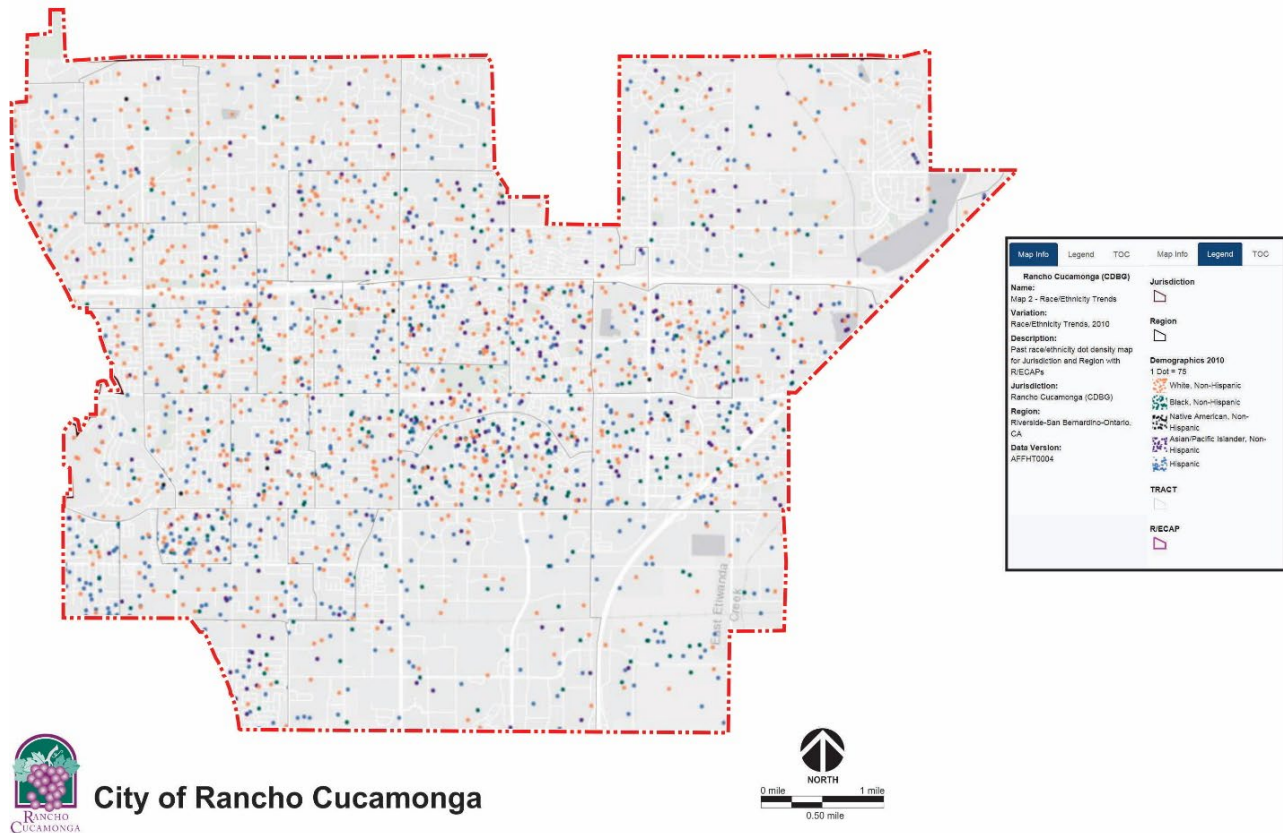
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Map II-IV Race/Ethnicity



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Map II-V
Race/Ethnicity Trends



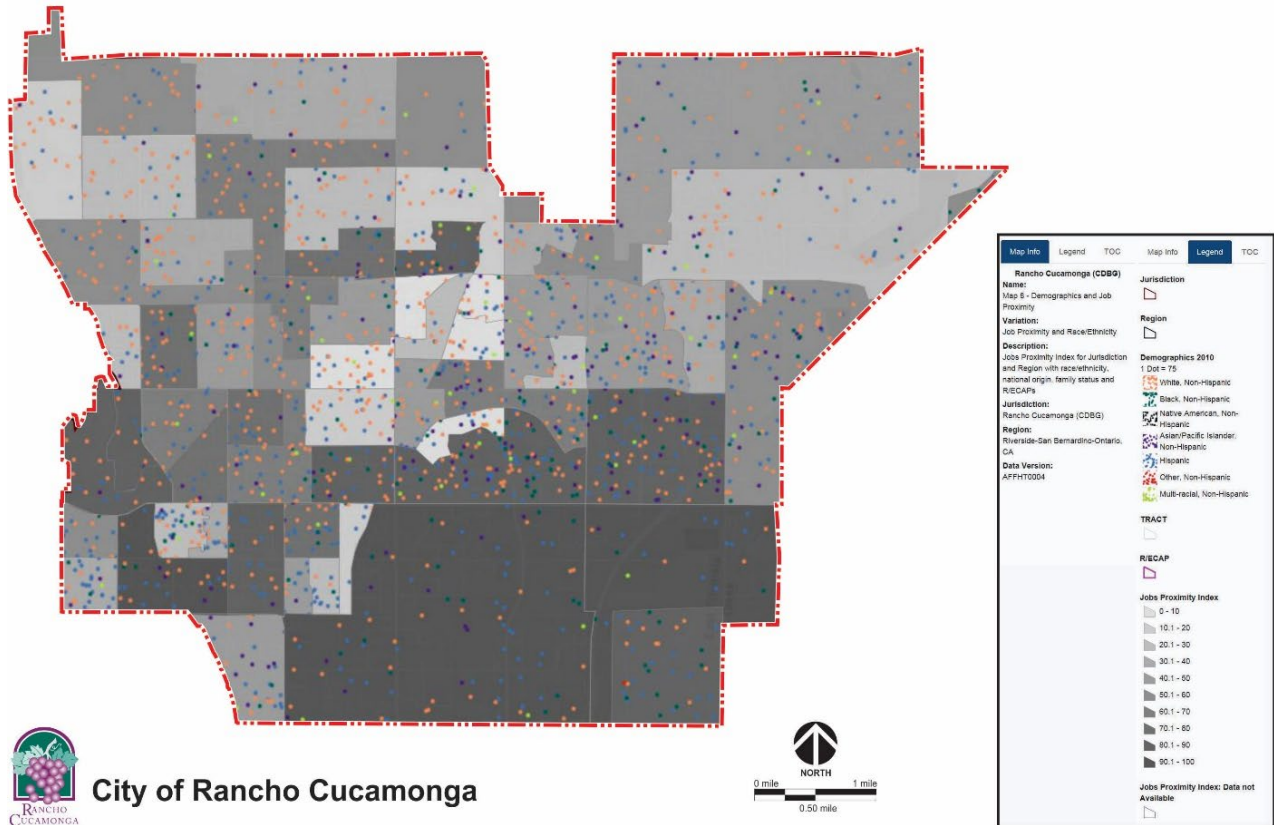
B. Income Profile

According to ACS data, the median household income is just under \$90,000 per year in 2018 dollars. The 2011-2015 American Community Survey 5-Year Estimates Data used in HUD's planning framework indicates that approximately two-thirds of Rancho Cucamonga households earn more than the countywide median income.

HUD's AFFH-T provides information on job proximity and race/ethnicity. **Map II-VI** identifies job proximity. Each dot represents 75 residents of a given ethnic or racial group living in the area, while the shading represents the score of the area on the job proximity index. The lower the score on the index, the more difficult it is for someone to find work within the jurisdiction.

Considering this, in the northern areas of the City, the shading on the map indicates that more of these residents must leave the City and commute to their jobs, as opposed to residents who live in the southern portion of the City who have greater access to employment in terms of job proximity to where they live.

Map II-VI Demographics and Job Proximity



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

C. Housing Profile

Public Housing

Following the trends seen in the previous section, the city of Rancho Cucamonga faces unique housing issues when compared with the region. Starting with the public housing provided by the jurisdiction, **Table II-VII** shows that public housing represents a very small percentage of the overall housing in the city. Less than 1 percent of all houses are publicly supported, with the two types of public housing being Project-Based Section 8 housing, and HCV program housing.

When looking at **Table II-VIII** the jurisdiction's public housing has a similar demographic make-up when compared to the region. The main difference is the percentage of residents in public housing who are Asian or Pacific Islander. The jurisdiction has around 10 percent of its public housing occupied by such residents, whereas the regional average is only around 6 percent. Another issue illuminated by **Table II-VIII** is the demographic breakdown of houses in relation to the area median income (AMI) of the jurisdiction and the region. AMI is a statistic used by HUD which tracks the median incomes for all cities across a county. When comparing how Rancho Cucamonga households compare to the regional averages, the jurisdiction is mainly under performing in two areas. While the region has around 4 percent of its Asian and Pacific Islander households within the 0-80 percent of the AMI, the jurisdiction has nearly 10 percent of such households in that category. That disparity is seen again when looking at White residents, wherein the region has around 36 percent of White households in the 0-80 AMI bracket, while the jurisdiction has over 40 percent of its White public housing homes in that category.

Further information regarding public housing can be seen below in **Map II-VII**. This map details the locations of the public housing in the jurisdiction. It is important to note that the locations of the jurisdiction's public housing are largely concentrated in low income areas, and are generally near transit services. The map shows the presence of public housing near the intersections of Citrus and Sierra, as well as the Palmetto Avenue.

Table II-VIII
Publicly Supported Houses by Program Category

	(Rancho Cucamonga, CA CDBG) Jurisdiction	
Housing Units	#	%
Total housing units	56,643	-
Public Housing	N/a	N/a
Project-based Section 8	117	0.21%
Other Multifamily	N/a	N/a
HCV Program	377	0.67%

Table II-IX
Publicly Supported Houses by Race and Ethnicity

(Rancho Cucamonga, CA CDBG) Jurisdiction								
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	24	25.53%	40	42.55%	21	22.34%	8	8.51%
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
HCV Program	93	23.79%	188	48.08%	98	25.06%	11	2.81%
Total Households	26,722	49.02%	4,429	8.12%	16,192	29.70%	5,745	10.54%
0-30% of AMI	1,340	44.53%	305	10.14%	764	25.39%	453	15.05%
0-50% of AMI	2,515	35.08%	670	9.35%	2,369	33.05%	743	10.36%
0-80% of AMI	5,379	40.96%	1,190	9.06%	4,269	32.51%	1,328	10.11%
(Riverside-San Bernardino-Ontario, CA) Region								
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	108	17.45%	203	32.79%	265	42.81%	42	6.79%
Project-Based Section 8	1,245	24.20%	1,055	20.51%	2,439	47.41%	366	7.12%
Other Multifamily	672	31.88%	252	11.95%	770	36.53%	404	19.17%
HCV Program	4,542	24.88%	8,293	45.43%	4,965	27.20%	386	2.11%
Total Households	615,660	47.84%	96,380	7.49%	469,370	36.47%	75,739	5.88%
0-30% of AMI	61,410	38.82%	18,475	11.68%	65,705	41.54%	7,940	5.02%
0-50% of AMI	101,180	32.18%	30,355	9.65%	137,770	43.82%	13,890	4.42%
0-80% of AMI	192,920	36.04%	45,500	8.50%	237,820	44.42%	23,430	4.38%

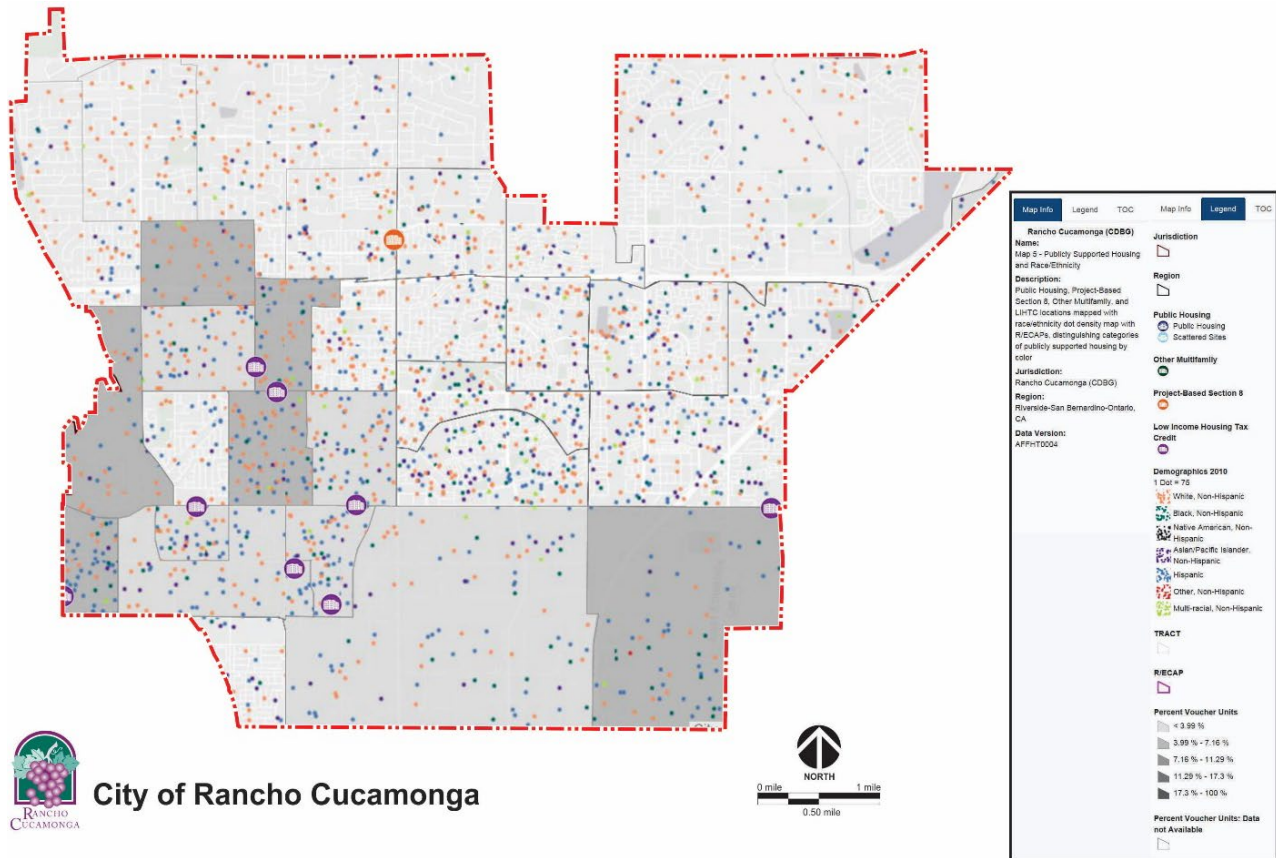
Note 1: Data Sources: Decennial Census; APSH; CHAS

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

Note 3: Refer to the Data Documentation for details

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

Map II-VII Publicly Supported Housing



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Housing Problems

The AFFH-T Data Documentation states the following: “To assist communities in describing and identifying disproportionate housing needs in their jurisdictions and regions, the AFFH-T provides data identifying instances where housing problems or severe housing problems exist. The AFFH-T presents housing problems overall, as well as variations by race/ethnicity, household type and household size.”

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

1. Lacks complete kitchen facilities: Household lacks a sink with piped water, a range or stove, or a refrigerator.
2. Lacks complete plumbing facilities: Household lacks hot and cold piped water, a flush toilet and a bathtub or shower.
3. Overcrowding: A household is considered overcrowded if there are more than 1.01 people per room.

-
4. **Cost Burden:** A household is considered cost burdened if the household pays more than 30 percent of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

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

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

According to the data in **Table II-IX** and **Map II-VIII** below, the total number of households within the jurisdiction is 54,515. Of those households, 24,900, or 45.68 percent, experience housing problems. Among those 26,960 households experiencing problems, 11,585, or 21.25 percent of the total, experience severe housing problems. These percentages are below the regional averages, wherein the incidences of housing problems and severe housing problems are 49.19 percent and 27.82 percent respectively. While these averages are good, both Hispanic and Asian or Pacific Islander households within the jurisdiction experience housing problems and severe housing problems at higher rates than the jurisdiction’s average (though they remain below the regional average). Specifically, 50.54 percent of Hispanics and 50.88 percent of Asian or Pacific Islanders experience housing problems, while 23.98 percent of Hispanics and 23.29 percent of Asian or Pacific Islanders experience severe housing problems. While these rates do not qualify as disproportionate rates, as they are not 10 percent higher than the regional average, they nonetheless are rather significant.

Table II-IX
Demographics of Houses with Disproportionate Housing Needs

Disproportionate Housing Needs	(Rancho Cucamonga, CA CDBG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	10,882	26,722	40.72%	248,500	615,660	40.36%
Black, Non-Hispanic	2,200	4,429	49.67%	56,215	96,380	58.33%
Hispanic	8,184	16,192	50.54%	276,310	469,370	58.87%
Asian or Pacific Islander, Non-Hispanic	2,923	5,745	50.88%	37,085	75,739	48.96%
Native American, Non-Hispanic	8	73	10.96%	2,874	5,864	49.01%
Other, Non-Hispanic	685	1,330	51.50%	12,120	24,015	50.47%
Total	24,900	54,515	45.68%	633,100	1,287,025	49.19%
Household Type and Size						
Family households, <5 people	14,449	33,639	42.95%	310,890	715,300	43.46%
Family households, 5+ people	3,715	7,190	51.67%	160,795	249,069	64.56%
Non-family households	6,733	13,682	49.21%	161,420	322,655	50.03%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	4,928	26,722	18.44%	122,935	615,660	19.97%
Black, Non-Hispanic	1,075	4,429	24.27%	32,125	96,380	33.33%
Hispanic	3,883	16,192	23.98%	174,310	469,370	37.14%
Asian or Pacific Islander, Non-Hispanic	1,338	5,745	23.29%	20,279	75,739	26.77%
Native American, Non-Hispanic	4	73	5.48%	1,499	5,864	25.56%
Other, Non-Hispanic	340	1,330	25.56%	6,870	24,015	28.61%
Total	11,585	54,515	21.25%	358,025	1,287,025	27.82%

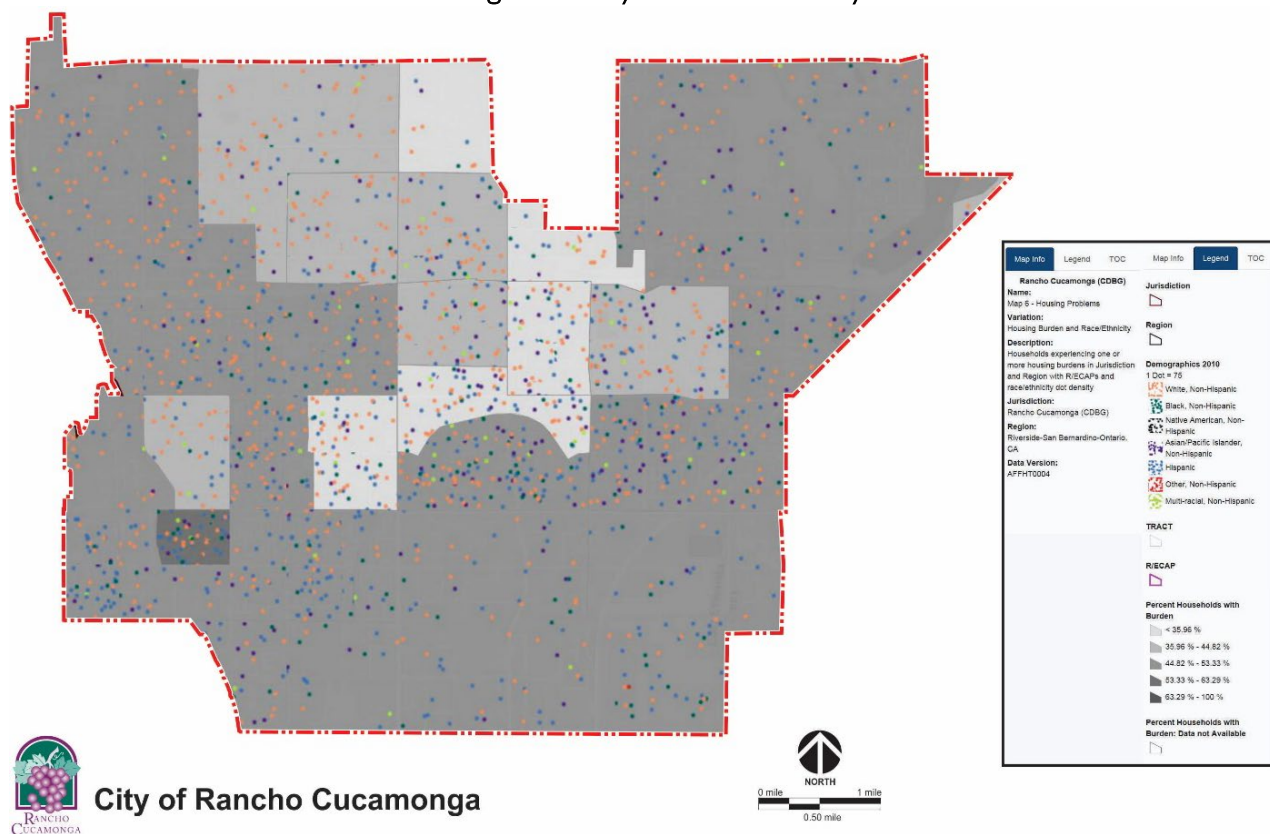
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost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

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

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Map II-VIII
Housing Burden by Race and Ethnicity



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Complementing these numbers is the information regarding households with severe housing cost burdens, which is shown in **Table II-X**. HUD defines a severe housing cost-burden as any home which must spend over 30 percent of their income on housing, such that paying for may have difficulty affording necessities such as food, clothing, transportation, and medical care. As was true of homes experiencing problems, the percentage of homes experiencing severe housing cost burdens is lower in the jurisdiction than in the region. When it comes to the city of Rancho Cucamonga, both the demographic breakdown of households bearing such costs, as well as the total number of homes in such a situation, are below the region's averages.

Table II-X
Demographics of Households with Severe Housing Cost Burdens

Households with Severe Housing Cost Burden	(Rancho Cucamonga, CA CDBG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	4,575	26,722	17.12%	109,075	615,660	17.72%
Black, Non-Hispanic	990	4,429	22.35%	28,670	96,380	29.75%
Hispanic	2,855	16,192	17.63%	112,350	469,370	23.94%
Asian or Pacific Islander, Non-Hispanic	1,130	5,745	19.67%	16,065	75,739	21.21%
Native American, Non-Hispanic	4	73	5.48%	1,145	5,864	19.53%
Other, Non-Hispanic	285	1,330	21.43%	5,605	24,015	23.34%
Total	9,839	54,515	18.05%	272,910	1,287,025	21.20%
Household Type and Size						
Family households, <5 people	5,650	33,639	16.80%	140,335	715,300	19.62%
Family households, 5+ people	824	7,190	11.46%	46,785	249,069	18.78%
Non-family households	3,384	13,682	24.73%	85,810	322,655	26.59%

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

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

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

Note 4: Data Source: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Opportunity Indices

Table II-XII contains seven additional opportunity indices: environmental health, low poverty index, school proficiency index, labor market index, transit index, low transportation index, and the job proximity index. What follows is a summary of each of the jurisdiction's scores for these various indices as compared to the region's scores.

Environmental Health Index

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

The EPA standardizes its estimates of air quality hazards using the National Air Toxics Assessment (NATA), which is EPA's ongoing review of air toxics in the United States. EPA developed NATA as a screening tool for state, local and tribal air agencies. NATA's results help these local agencies identify

which pollutants, emission sources and places they may wish to study further to better understand any possible risks to public health from air toxics. EPA suggests that local communities use NATA to “prioritize pollutants and emission source types; identify places of interest for further study; get a starting point for local assessments; focus community efforts; inform monitoring programs.” According to EPA, communities have found that using NATA helps “inform and empower citizens to make local decisions about their community’s health. Local projects often improve air quality faster than federal regulations alone.”

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

Rancho Cucamonga shows lower environmental index scores across the board, regardless of the race or income of the individual. The highest score on the index is for White residents, with a score of 44.87, which is well below the regional average of 55.48. A similarly large disparity exists for Native American residents, wherein their score of 42.18 in the jurisdiction is significantly below the regional score of 56.24. The remaining racial and ethnic groups all have scores that are within a few points of the regional averages.

According to HUD, the low poverty index captures poverty in a given neighborhood or jurisdiction. The index considers the overall poverty rate of the area, and then converts that rate into a number between 0 and 100. The higher the score, the lower the area’s exposure to poverty is. The jurisdiction’s score for each category is above the region’s average. Of particular note is the significantly lower exposure that Hispanic residents have to poverty in the jurisdiction, as the city’s score of 73.11 for that group is well above the regional score of 37.51.

The school proficiency index uses test scores from fourth grade students to determine whether neighborhoods have high-performing, or low-performing, elementary schools. The higher the score, the higher the quality of elementary schools in the area. Compared to regional averages, the jurisdiction is performing significantly better than the region. Of particular note is once again the significantly higher score for Hispanic residents, as their jurisdiction score of 67.20 is well above the regional score of 37.99.

The labor market index is meant to convey the general strength of human capital and labor market engagement in a given area. Three factors determine an area’s score for this index: the unemployment rate, the labor market participation rate (the total number of workers employed divided by the working

age population), and the educational attainment of the census tract (percent with a bachelor's degree). The higher the score, the higher labor market engagement is. With respect to this index, the jurisdiction is outperforming the region. Each group's score is around 20 points higher than the regional average.

The transit index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the score, the more likely residents are to utilize public transportation. For this index, the jurisdiction is performing similar to the region for this index. More importantly, use of transit is relatively consistent across each racial group, suggesting that there does not exist a racial disparity in resident's reliance on, or use of, public transit.

The low transportation index is based on estimates of transportation expenses for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. CBSA). The higher the score, the lower the transportation cost for an area is. Once again, the jurisdiction is slightly outperforming the region when it comes to transportation costs. Each racial and ethnic group has around a ten point increase in their score within the jurisdiction compared to the region.

The final index, job proximity index, quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. The higher the score, the better access to employment opportunities is for a given area. The jurisdiction is consistent with its opportunities for employment regardless of a resident's race, and it is in line with each of the regional scores. Each racial category has a job proximity index of that is close to the regional average, and no scores in the jurisdiction are below the regional average.

Table II-XIII
Opportunity Indicators by Race/Ethnicity

(Rancho Cucamonga, CA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	76.93	74.99	57.57	45.83	34.52	51.56	44.87
Black, Non-Hispanic	73.93	67.74	56.48	46.70	42.02	59.56	40.54
Hispanic	73.11	67.20	54.01	47.22	39.80	55.66	40.59
Asian or Pacific Islander, Non-Hispanic	81.06	73.77	62.61	45.68	36.55	56.31	43.53
Native American, Non-Hispanic	75.65	69.87	56.93	47.02	37.96	51.72	42.18
Population below federal poverty line							
White, Non-Hispanic	71.97	72.12	58.69	49.20	41.96	57.31	41.10
Black, Non-Hispanic	69.98	58.22	51.62	49.83	48.82	63.65	33.99
Hispanic	55.99	52.75	44.18	52.03	47.74	57.79	36.61
Asian or Pacific Islander, Non-Hispanic	77.30	76.14	63.42	45.96	36.32	53.97	43.73
Native American, Non-Hispanic	54.54	39.16	41.89	47.41	40.78	73.44	33.46
(Riverside-San Bernardino-Ontario, CA) Region							
Total Population							
White, Non-Hispanic	52.61	50.65	34.50	37.96	25.75	49.50	55.48
Black, Non-Hispanic	42.80	41.50	27.18	42.55	31.82	49.72	44.22
Hispanic	37.51	37.99	24.20	43.12	32.68	47.81	42.38
Asian or Pacific Islander, Non-Hispanic	60.42	56.42	43.02	41.92	29.18	48.25	42.29
Native American, Non-Hispanic	41.19	40.74	25.06	36.84	26.34	50.16	56.24
Population below federal poverty line							
White, Non-Hispanic	38.39	42.36	25.55	38.74	29.20	49.95	56.84
Black, Non-Hispanic	27.15	30.84	17.39	43.48	34.78	48.95	44.86
Hispanic	23.78	31.06	16.42	44.76	36.54	49.34	42.23
Asian or Pacific Islander, Non-Hispanic	42.30	43.14	30.51	45.00	37.05	51.32	39.74
Native American, Non-Hispanic	30.24	34.37	20.61	39.17	32.05	52.23	50.63

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

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

D. Special Housing Needs Profile

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

Table II-XIV summarizes the proportions of special needs groups in Rancho Cucamonga. The following discussion describes and analyzes the housing needs of each group. Data are from the 2010 Census, the Brown Longitudinal Tract Database (LTDB) based on the census, and the 2009-2013 and 2012-2016 American Community Surveys (ACS).

Table II-XIV
Disability by Type

	(Rancho Cucamonga, CA CDBG) Jurisdiction		(Riverside-San Bernardino- Ontario, CA) Region	
Disability Type	#	%	#	%
Hearing difficulty	3,793	2.46%	125,033	3.20%
Vision difficulty	2,483	1.61%	86,934	2.23%
Cognitive difficulty	4,906	3.19%	170,114	4.36%
Ambulatory difficulty	6,850	4.45%	241,262	6.18%
Self-care difficulty	3,157	2.05%	102,841	2.63%
Independent living difficulty	5,101	3.31%	170,490	4.37%

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

Note 2: Data Sources: ACS

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

Senior Citizens

According to the 2010 Census, around 8 percent of Rancho Cucamonga's residents were seniors, defined as persons age 65 or older. This statistic represents an increase from the 5 percent of the population that were seniors in 1990. Seniors comprise a significant and growing contingent of Rancho Cucamonga residents, who need accommodation in the area of housing, due to limited income and higher disability rates, including ambulatory and other disabilities that require significant retrofitting of housing units.

In terms of disabilities, under 1 percent of City residents between the ages of 5 and 7 have disabilities. As shown in **Table II-XV** below, the largest share of disabled persons within the City is between the ages of 18 and 64 and represents 4.54 percent of the total population. At 6,995, this number represents 6.4 percent of the 109,679 City residents within this age group. By comparison, the 5,122 disabled persons over 65 represent nearly half the total of 13,053 elderly persons within the community.

Table II-XV
Disability by Age Group

	(Rancho Cucamonga, CA CDBG) Jurisdiction		(Riverside-San Bernardino-Ontario, CA) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	1,251	0.81%	37,092	0.95%
age 18-64 with Disabilities	6,995	4.54%	241,640	6.19%
age 65+ with Disabilities	5,122	3.33%	174,002	4.46%

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

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details

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

People with Disabilities

The Fair Housing Act prohibits housing discrimination against any person based on disability. The Americans with Disabilities Act defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” People with disabilities have special housing needs because of their fixed income, higher health costs, and need for accessible and affordable housing.

Table II-XV reveals that that the City of Rancho Cucamonga has 8,246 disabled residents ages 5 to 64, and another 5,122 elderly residents with disabilities. **Table II-XIV** shown above reveals the numbers living with each different type of disability within the community. According to **Table II-XVI**, the Rancho Cucamonga Housing Authority accommodates the highest number of disabled individuals in the Housing Choice Voucher program, with around 36 percent of HCV program houses being occupied by a person with a disability.

Interestingly, unlike other demographic factors analyzed in this report, the jurisdiction does not have a concentration of persons with disabilities in any singular location. As seen by **Map II-IX**, the 13,368 persons with disabilities within the jurisdiction are spread out across the city. There is no singular location that appears to hold a disproportionate, or significantly higher, percentage of persons with disabilities.

Table II-XVI
Disability by Publicly Supported Housing Program Category

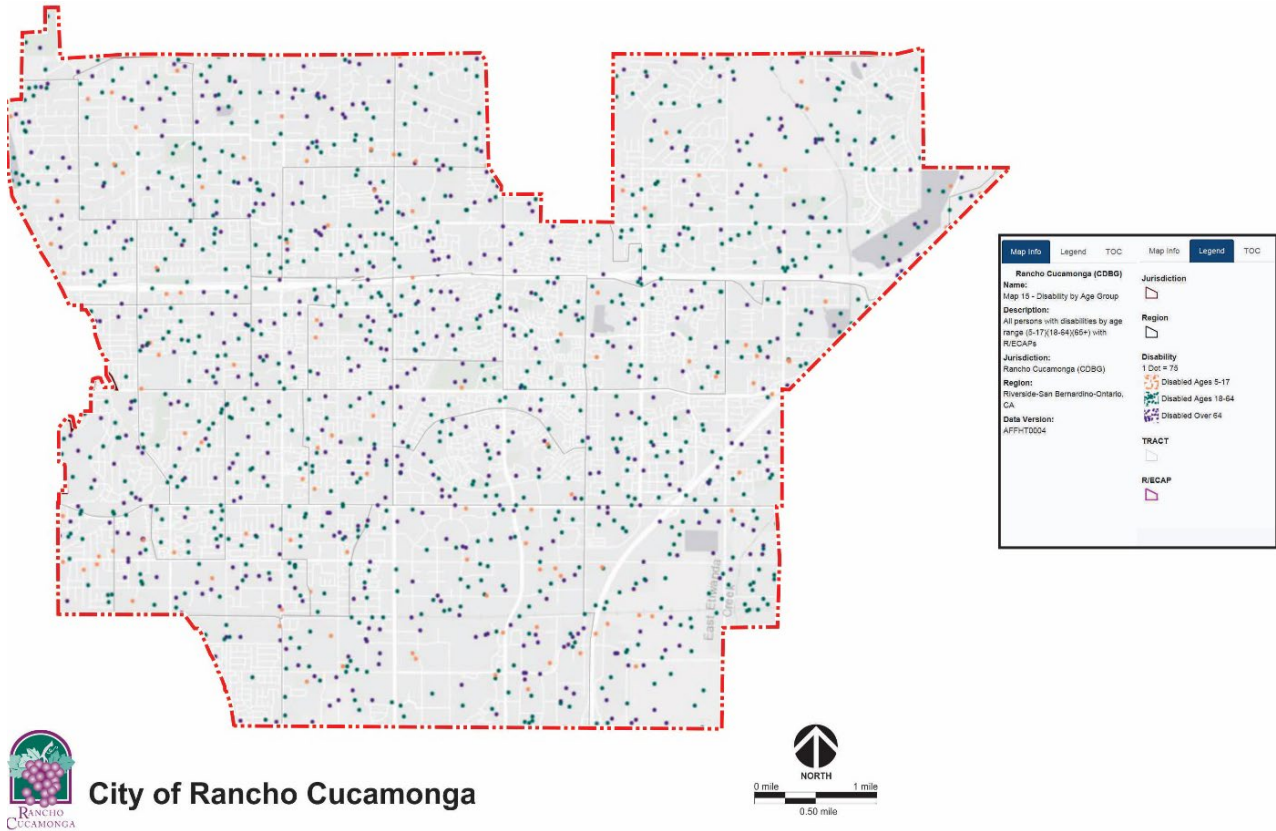
(Rancho Cucamonga, CA CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	7	7.07%
Other Multifamily	N/a	N/a
HCV Program	146	36.14%
(Riverside-San Bernardino-Ontario, CA) Region		
Public Housing	82	12.75%
Project-Based Section 8	520	9.86%
Other Multifamily	73	3.35%
HCV Program	5,235	27.51%

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

Note 2: Data Sources: ACS

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

Map II-IX
Persons with Disabilities



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

III. Private Sector Impediments

Fair housing opportunity is covered by federal and State regulations and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing based on 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 Rancho Cucamonga and its interrelationship with fair housing services.

Owner-Occupied Housing

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

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 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 2017 calendar year, 8,003 households filed loan applications for housing in Rancho Cucamonga. Of those applications, 1,124 were withdrawn before approval or denial and 407 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 6,472 loan applications. The data in **Table III-1** shows that the number of loan applications is highest for home refinancing loans, followed by home purchase and then home improvement. Loan approval ratings is highest for refinancing loans, followed by home purchase, and then home improvement. Conventional loans were most common for all three types of loans. The average loan approval rate for all loan types was 83.4 percent.

Table III-1
Home Loan Application Activity in Rancho Cucamonga

Type	Number of Loan Applications	Share of Loan Applications	Number Approved	Approval Rate
Home Purchase	2,344	36.22%	2,129	90.83%
Conventional	1,970	30.44%	1,781	90.41%
FHA - Insured	246	3.80%	229	93.09%
VA - Guaranteed	122	1.89%	113	92.62%
FSA/RHS	6	0.09%	6	100.00%
Home Improvement	546	8.44%	398	72.89%
Conventional	509	7.86%	368	72.30%
FHA - Insured	25	0.39%	20	80.00%
VA - Guaranteed	12	0.19%	10	83.33%
FSA/RHS	0	0.00%	0	0.00%
Refinancing	3,582	55.35%	2,872	80.18%
Conventional	2,941	45.44%	2,368	80.52%
FHA - Insured	375	5.79%	292	77.87%
VA - Guaranteed	266	4.11%	212	79.70%
FSA/RHS	0	0.00%	0	0.00%
Total:	6,472	100.00%	5,399	83.42%

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

Mortgage Interest Rates & Fees

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

The author of this study used HMDA data from loans between the years of 2014 and 2018, and considered a number of variables, including: race, when the mortgage was originated, borrower’s characteristics (specifically their race and gender), the type of loan issued, tract characteristics of applicants, residential segregation in the applicant’s area, and the census region of the applicant.

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

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

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

Lending Outcomes

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

Lending Outcomes by Income and Race/Ethnicity. Generally, home loan approval rates increase as household income increases. The exception was home purchase loans, wherein both middle- and upper-income applicants had lower approval rates than low income applicants. Low-income applicants had overall approval rates of 74.3 percent, middle-income applicants had an overall approval rate of 81.3 percent, and high-income applicants had an overall approval rate of 82.5 percent. The best approval rates were for low income home purchase loan applicants at 92.4 percent.

For home purchase, home improvement, and refinance loans regardless of income, most applications were from Hispanic applicants. The exception to this was low income home purchase and refinance loans, in which the race of the applicant was not disclosed or was not applicable. Approval rates were generally highest for Whites, followed by those declining to state. African American applicants generally had the lowest approval ratings, being below the average acceptance rate in seven of the nine categories (the exception being low income home improvement and refinance loans). **Table III-2** shows loan approval rates for home purchases, home improvement, and refinances by applicant characteristics.

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.

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
Home Purchase	392	92.35%	398	89.20%	1,554	90.86%
Hispanic	28	78.57%	109	84.40%	337	93.47%
White	32	65.63%	132	90.15%	643	92.07%
Asian	59	88.14%	85	92.94%	261	90.42%
African American	10	90.00%	27	88.89%	60	75.00%
All Others	3	66.66%	7	100.00%	35	82.86%
Decline or N/A	260	98.46%	38	89.47%	218	89.45%
Home Improvement	66	51.52%	94	75.53%	386	75.91%
Hispanic	14	28.57%	29	75.86%	83	73.49%
White	26	42.31%	40	80.00%	184	82.61%
Asian	5	100.00%	7	71.43%	27	77.78%
African American	5	100.00%	6	33.33%	21	42.86%
All Others	5	40.00%	1	100.00%	11	72.73%
Decline or N/A	11	63.64%	11	81.82%	60	70.00%
Home Refinance	731	78.93%	616	79.22%	2,235	80.85%
Hispanic	104	74.04%	173	85.55%	467	79.66%
White	189	66.67%	237	82.28%	962	85.55%
Asian	36	63.89%	59	79.66%	197	79.19%
African American	36	80.56%	36	44.44%	141	65.96%
All Others	18	83.33%	13	69.23%	65	70.77%
Decline or N/A	348	88.22%	98	74.49%	403	78.66%

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

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. Rancho Cucamonga 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
Minority Percentage						
20% to 50%	558	504	90.32%	885	723	81.69%
50% to 80%	1754	1593	90.82%	2,619	2,090	79.80%
80% +	32	32	100.00%	78	59	75.64%
Tract Income						
Low	245	222	90.61%	287	219	76.31%
Middle	544	508	93.38%	784	643	82.02%
Upper	1555	1399	89.97%	2511	2010	80.05%

Source: HMDA Database, 2017.

Predatory Lending

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

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

In addition, the Truth in Lending Act (TILA) requires lenders to inform the borrower about payment schedules, loan payments, prepayment penalties, and the total cost of credit. In 1994, Congress

amended TILA and adopted the Home Ownership and Equity Protection Act (HOEPA). HOEPA requires that lenders offering high-cost mortgage loans disclose information if the annual percentage rate (APR) is ten points above the prime rate or if fees are above eight percent of the loan amount. HOEPA also prohibits balloon payments for short-term loans and, for longer covered loans, requires a warning if the lender has a lien on the borrower's home and the borrower could lose the home if they default on the loan payment.

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

Foreclosures

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

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

Southern California and San Bernardino County, in particular, were characterized by a high percentage of foreclosed homes as many homeowners were unable to keep up with payments. The high foreclosure rate prompted Congress to create the Neighborhood Stabilization Program (NSP), which is administered by the U.S. Department of Housing and Urban Development (HUD) to purchase abandoned and foreclosed properties in an effort to stabilize local housing markets that have been targeted for their high risk of foreclosure. The NSP provided grants to every state and certain local

communities to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes. The program was authorized under Title III of the Housing and Economic Recovery Act of 2008.

The high incidence of foreclosure and the housing crisis in general represented a 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.

A decade has now passed since the foreclosure crisis, and the housing market has rebounded. ATTOM Data Solutions recently announced its Fiscal Year 2018, 3rd Quarter numbers, which show that foreclosure filings are down 6 percent from the previous quarter, down 8 percent from the third quarter last year, and were at their lowest levels since the fourth quarter of Fiscal Year 2005.² Not only are foreclosure filings down for the last quarter, foreclosure filings have been below the pre-recession average for eight consecutive quarters. However, that same report indicates that there is still a relatively modest, but widespread, foreclosure risk associated with FHA loans originated in 2014 and 2015, exceeding the long-term average foreclosure rates for all FHA loans. Overall, the housing market seems to have recovered from the recent crisis.

Agency Coordination

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

National Association of Realtors (NAR). The National Association of Realtors (NAR) is a consortium of realtors which represent the real estate industry at the local, state, and national level. Locally, the Inland Valley Association of Realtors (IVAR) is the main association that serves the City of Rancho Cucamonga 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,

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

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 at: <http://www.dre.ca.gov/>. The licensure status of individual agents can be reviewed at: http://www.dre.ca.gov/licensees_sub.htm. This web site includes any complaints or disciplinary action against the agent.

Realtor Associations Serving Rancho Cucamonga. Realtor associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies among these associations, and local association membership is generally determined by where the broker is located. Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as detailed statistics of the education/services these agencies provide or statistical information pertaining to the members is rarely available. IVAR serves the Rancho Cucamonga area.

California Department of Real Estate (DRE). The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. DRE has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that enables an agent to identify and avoid discriminatory practices when providing real estate services.

DRE investigates written complaints received from the public alleging possible violations of the Real

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

DRE reviews Covenants, Conditions, and Restrictions (CC&R's) for all subdivisions of five or more lots, or condominiums of five or more units. The review includes a wide range of issues, including compliance with fair housing law. CC&R's are restrictive covenants that involve voluntary agreements, which run with the land they are associated with. In the past, CC&R's were used to exclude minorities from equal access to housing. DRE reviews CC&R's and they must be approved before issuing a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report.

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

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).

Discriminatory advertising can be one of the most insidious forms of discrimination based on its widespread dissemination. Marketing is typically broad-based, reaching many people, and as such, can have a chilling effect on the market. This is also particularly true when the discrimination is unintentional or subconscious. Landlords who may never discriminate knowingly against a minority applicant may not be contacted by minority potential renters due to unconscious signaling in the advertisements. This is why, even though there are exceptions in the Fair Housing Act for when it applies, there is no similar exception when it comes to the advertising rules.

Viewing the Unit

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

Qualifying for the Lease

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

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

The Lease

Most apartments are rented under either a lease agreement or a month-to-month rental agreement, both of which have advantages and disadvantages for both landlords and tenants. Some tenants see a lease as more favorable for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. However, some tenants prefer the flexibility that a month-to-month tenancy provides. The lease agreement usually includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements, and there are rights and responsibilities on both sides of the contract. Typically, the rental agreement is a standard form for all units in the same building. However, enforcement of rules contained in the lease agreement may not be standard. A landlord may choose to strictly enforce rules for certain tenants based on their race/ethnicity, children, or a disability – raising fair housing concerns.

Rental Housing Services

The City of Rancho Cucamonga has contracted with Inland Fair Housing and Mediation Board (IFHMB) to provide fair housing and related services. Established in 1980, IFHMB is a private, non-profit and community-based organization which implements the following fair housing programs for communities throughout San Bernardino County:

- **Community-Based Mediation.** IFHMB provides trained mediators to provide education and information regarding rights and responsibilities under the California Landlord-Tenant laws and help to resolve conflicts between landlords and tenants (including mobile homes). IFHMB contracts with San Bernardino County to provide mediation in small claims and unlawful detainer lawsuits in County courts.
- **Education/Outreach.** IFHMB provides education and outreach services to landlords and tenants, Realtors, newspapers, service organizations, schools, persons with Limited English Proficiency, and others interested in learning about fair housing laws. IFHMB also provides HUD-certified counseling to homeowners who are delinquent on FHA loans or seniors interested in reverse equity mortgage loan programs. Fair housing workshops and newsletters are also provided on a quarterly basis.

-
- **Senior Services.** IFHMB actively and successfully mediates conflicts between seniors and Social Security, Medi-Cal, utility companies, collection agencies, neighbors, and others. IFHMB also provides a Care Referral Service, offers help in filing for HEAP and Homeowner/Renter Assistance, and maintains a list of senior housing and care homes.
 - **Alternative Dispute Resolution.** The California Dispute Resolution Programs Act of 1986 provides the authority for mediation in the court system. Inland Fair Housing and Mediation Board has a contract with the County of San Bernardino to provide mediation in civil, family, probate, small claims, and unlawful detainer lawsuits in all of the courts in San Bernardino County.
 - **Mobile Home Mediation.** IFHMBs mediators are trained to handle the specialized problems based on the Mobile Home Residency Law (MRL) that reflects the dual ownership and unique life style of mobile home communities. They provide education and information to residents and parks about the MRL, as well as provide information to both sides when fair housing issues are presented, and when requested serve as neutral third parties to facilitate resolution of conflicts.

During the five-year period covering the last A.I. cycle (FY 2013-2017), IFHMB assisted rental housing residents in the City of Rancho Cucamonga with the resolution of a wide variety of landlord/tenant issues. **Table III-4** includes a five-year tabulation of landlord-tenant related inquiries received by IFHMB. It is important to note that any resident in IFHMB's service area can utilize their services and expertise to navigate the complex laws facing landlords, managers and tenants in the rental housing market. It is common for landlords, managers and tenants to take inappropriate actions against other parties due to lack of knowledge about laws affecting tenancy in rental housing. Oftentimes, such disputes are resolved merely through education, and do not require the parties to file a lawsuit, or file formal complaints with the City, to enforce their rights.

Table III-4
General Housing Inquiries (Rental)

Inquiry Category	Number of Inquiries	Number of Residents Affected
Repairs	32	102
Eviction	53	157
Rent increase	15	31
Management Problems	0	0
Neighbor-to-Neighbor Disputes	4	9
Rules & Regulations	1	1
Security Deposit	19	53
Tenancy Term	3	9
Shared Utilities	6	7
Illegal Entry	0	0
Right and Responsibilities	56	121
Foreclosure	1	2
Fees	0	0
Maintenance	1	1
Totals:	191	493

Source: IFHMB, 2019.

An evaluation of the volume of inquiries by topic as listed in **Table III-4** reveals that the most landlord-tenant disputes arise as a result of lack of knowledge of rights and responsibilities, eviction, repairs, security deposits, and rent increases.

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. 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.

IV. Analysis of Public Policies

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. The General Plan provides for the following residential land use designations:

- **Very Low Residential** (0.10 to 2.0 Dwelling Units per Acre) - *4,007 total acres within City Area* - The Very Low Residential designation is characterized by detached, very low-density single residential units on 0.5-acre lots or larger, with private yards and private parking.
- **Low Residential** (2.0 to 4.0 Dwelling Units per Acre) - *4,371 total acres within City area* - The Low Residential designation is characterized by detached, low-density single residential units on individual lots forming a cohesive neighborhood, with private yards and private parking.
- **Low Medium Residential** (4.0 to 8.0 Dwelling Units per Acre) - *1,852 total acres within City area* - The Low Medium Residential designation is characterized by detached or attached housing structures that contain either one or two individual dwelling units, such as single-unit zero-lot-line homes, cluster and patio homes, and duplexes. All development approaches include private, individually accessible parking for each unit.
- **Medium Residential** (8.0 to 14.0 Dwelling Units per Acre) - *790 total acres within City area* - The Medium Residential designation is characterized by detached and attached residential units, including small-lot subdivisions, duplexes and triplexes, and attached townhouse-type developments that provide private open space and multi-unit structures that comprise a cohesive development incorporating common opens pace areas. Mobile home parks are also allowed in this designation. Residential units may contain private yards and private parking or open common areas and shared parking.
- **Medium High Residential** (14.0 to 24.0 Dwelling Units per Acre) - *367 total acres within City area* - The Medium High Residential designation is characterized by low-rise condominiums and apartment buildings. Approaches to development may consist of

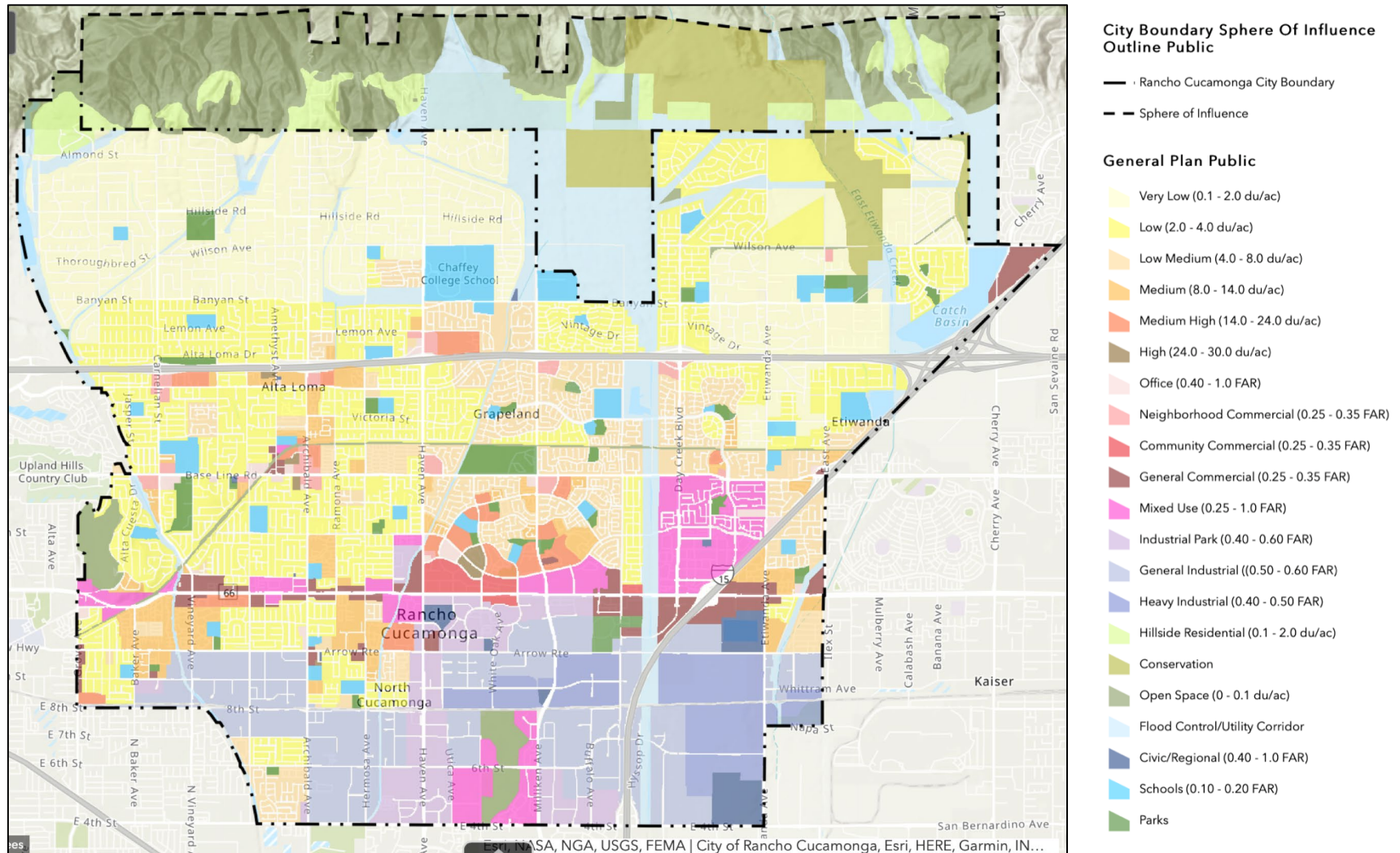
multiple-unit buildings or groups of buildings, with both private and common open space areas provided.

- **High Residential** (24.0 to 30.0 Dwelling Units per Acre) - *44 total acres within City area* - The High Residential designation is characterized by higher-density, multi-story residential development with a focus on providing an urban intensity and function at locations within walking distance to transit, recreation and community facilities, employment centers, and commercial services. Development typically is characterized by buildings between three to six stories in height and with open common areas.
- **Mixed Use** (4.0 to 30.0 Dwelling Units per Acre) - *294 total acres within City area* - Accommodates a mix of residential and non-residential uses, with development regulations that ensure compatibility with nearby lower density residential development, as well as internal compatibility among varying uses.
- **Hillside** (0.1 to 2.0 Dwelling Units per Acre) - *133 total acres within City area* - Designates sloped areas subject to special hillside development regulations.

Open Space (0.0 to 0.1 Dwelling Units per Acre) - *483 total acres within City area* - Intended primarily to protect environmentally sensitive land. The use regulations, development standards, and criteria provide low intensity development.

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

Map IV-1
Citywide Land Use Map



Zoning Ordinance

The Development Code, also known as Title 17 of the Rancho Cucamonga Municipal Code, sets forth the City's planning and zoning requirements. According to the Development Code, zoning districts are established in order to "classify, regulate, designate, and distribute the uses of land and buildings; to regulate and restrict the height, setbacks and bulk of buildings; to regulate the area of yards and other open spaces around buildings; and to regulate the density of population." The city is divided into zoning districts that are grouped into two categories: (a) base zoning districts and (b) overlay zoning districts." **Table IV-1** lists the zone districts within the Development Code that permit residential builds.

Table IV-1
Zoning Districts allowing residential uses

Zoning District Name	Zoning District Symbol	Description
<i>Residential Zoning Districts</i>		
Very Low Residential	VL	Designates areas for very low density residential use, with a minimum lot size of 20,000 square feet and a maximum residential density of up to 2 units per gross acre.
Low Residential	L	Designates areas for single-family residential use, with a minimum lot size of 7,200 square feet and a maximum residential density of 4 units per gross acre.
Low Medium Residential	LM	Designates areas for low medium density single-family or multiple-family use with site development regulations that assure development compatible with nearby single-family detached neighborhoods. Residential densities range from 4 to 8 units per gross acre maximum.
Medium Residential	M	Designates areas for medium density multiple-family use, with site development regulations that assure development compatible with nearby lower density residential development. Residential densities range from 8 to 14 units per gross acre maximum.
Medium High Residential	MH	Designates areas for medium high density multiple-family use, with site development regulations that assure development compatible with nearby lower density residential development. Residential densities range from 14 to 24 units per gross acre maximum.
High Residential	H	Designates areas for high density multiple-family use, with site development regulations that assure development compatible with nearby lower density residential development. Residential densities range from 24 to 30 units per gross acre.

Zoning District Name	Zoning District Symbol	Description
<i>Mixed Use Zoning District</i>		
Mixed Use	MU	Designates areas for a mix of residential and nonresidential uses, with site development regulations that assure development compatible with nearby lower density residential development, as well as internal compatibility among the varying uses.
<i>Open Space Zoning Districts</i>		
Hillside Residential	HR	Designates areas for maintaining natural open space character through protection of natural landforms; minimizing erosion; providing for public safety; protecting water, flora, and fauna resources; and establishing design standards to provide for limited development in harmony with the environment. Allowed density is a maximum of 2 units per net buildable acre as determined through the Hillside Development Review process.
<i>Overlay Zoning Districts</i>		
Senior Housing	SH	Designates areas available for affordable rental housing units to serve the city's senior citizens. District provisions ensure high quality project design and establish incentives for ongoing affordability for this target group. This district can be combined with any residential base zoning district that meets the overlay district qualifications.
Equestrian	E	Designates areas for the keeping of equine, bovine, and cleft-hoofed animals. Further, this district protects the ability to maintain such animals, promotes a "rural/farm" character in an urban setting, and recognizes and encourages the educational and recreational values derived from raising and maintaining such animals. This district may be combined with any residential base zoning district that meets the overlay district qualifications.
Foothill Boulevard	FB	Designates areas along Foothill Boulevard for special use and development regulations to implement the goals and objectives in the general plan for this important corridor that covers most of the length of Historic Route 66 through the city. Special regulations encourage a mix of uses, concentrate neighborhood, community, and regional-serving uses as appropriate, and accommodate future transit.
Hillside	H	Designates sloped areas subject to special hillside development regulations. Generally, this district applies to areas with a slope greater than or equal to 8%. This district may be combined with any residential base zoning district that meets the overlay district qualifications.

Zoning District Name	Zoning District Symbol	Description
<i>Special Purpose Zoning Districts</i>		
Specific Plan	SP	Designates areas for master planning through the adoption of a specific plan with unique land use and development standards for a particular project areas with a minimum of 300 acres.
Planned Community	PC	Designates areas master planning through the adoption of a Planned Community, which can establish unique land use and development standards for a particular project area. Planned Communities typically include less detail than specific plans and have no minimum project size requirement.
Open Space	OS	Open Space. Designates areas primarily to protect environmentally sensitive land. The use regulations, development standards, and criteria provide low intensity development and encourage recreational activities and preservation of natural resources.

Source: Rancho Cucamonga Municipal Code, Title XVII, Article III, Chapter 17.26.020.

Base Zoning Districts are defined as "the primary zoning district that applies to a property. Every parcel throughout the city has a base zoning district that establishes the primary land use type, density, intensity, and site development regulations. Base districts are grouped into six categories as follows:

1. Residential Zoning Districts.
2. Mixed Use Zoning Districts.
3. Commercial and Office Zoning Districts.
4. Industrial Zoning Districts.
5. Open Space Zoning Districts.
6. Special Purpose Zoning Districts."

Overlay Zoning Districts "supplement base zoning districts for one or more of the following purposes:

1. To allow more flexibility from the standard provisions of the underlying base zone.
2. To protect unique site features or implement location-specific regulations.
3. To specify a particular standard or guideline for an area."

In the event of a conflict between the regulations of the Base Zoning District and the Overlay Zoning District, the provisions of the Overlay Zoning District prevail.

In addition to implementing and regulating the General Plan residential land use designations through the creation of various residential zone districts, the City of Rancho Cucamonga has adopted five (5)

Specific Plan areas. Some Specific Plans incorporate provisions for housing. These Specific Plan areas include:

- Etiwanda North Specific Plan
- Etiwanda Specific Plan
- Foothill Boulevard Specific Plan
- Industrial Area Specific Plan
- Sub-Area 18 Specific Plan (Empire Lakes)

Specific Plans accomplish many important functions. Primarily, Specific Plans regulate land use and development within a specific project boundary, creating a master plan for an area. In most instances, these plans supersede the original zoning of the land unless otherwise specified. Specific Plans also serve to minimize the intrusion of new development in environmentally sensitive areas and to ensure the timely provision of essential public services and facilities consistent with the demand for such services. Specific Plans facilitate quality development within the city by permitting flexibility and by encouraging more creative and aesthetically pleasing designs for major urban development projects subject to large-scale community planning. Additionally, Specific Plans promote a harmonious variety of housing choices and commercial and industrial land uses. Planners strive to attain a desirable balance of residential and employment opportunities as well as a high level of urban amenities, all while preserving natural and scenic qualities of open space.

Housing Element

The Housing Element is one (1) of nine (9) mandated elements within the 2017 General Plan Guidelines of the State of California Governor's Office of Planning and Research. 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 Rancho Cucamonga 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 San Bernardino 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 from October 1, 2013 to October 1, 2021. the SCAG Regional Housing Needs Assessment (RHNA) also indicated the proportion of future housing units that should be accessible to households with varying incomes. The RHNA that is applicable to Rancho Cucamonga is summarized below:

- A total of 209 units should be allocated to very low-income households (less than 50 percent of the County median income);
- A total of 141 units should be provided for low-income (50 percent - 80 percent of the median income) households;
- A total of 158 units should be provided for moderate-income (80 percent - 120 percent of the median income) households; and
- A total of 340 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 848 units.

The City of Rancho Cucamonga 2013-2021 Housing Element sets forth goals and policies that address five major issue areas:

1. Conserve and improve the condition of the existing affordable housing stock;
2. Assist in the development of adequate housing to meet the needs of low and moderate income households;
3. Remove, to the extent feasible, constraints to the development, improvement, and preservation of housing;
4. Identify adequate housing sites which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all residents; and
5. Assure equal housing opportunity for all residents.

The Housing Element also describes various housing programs intended to facilitate meeting the objectives described above. To implement these goals and policies, the Housing Element 2013-2021 describes 24 critical programs. Where relevant to this Analysis of Impediments, housing programs that affect Fair Housing are described in this report. The City's Housing Element was adopted on May 19, 2010.

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 Type	Very Low	Low	Low Medium	Medium	Medium High	High	Very High
Single-family detached	P ¹	P	P	P	NP	NP	P ²
Single-family attached (2 to 4 plex)	NP ¹	NP	P	P	P	P	P
Multi-family	NP	NP	P ²	P	P	P	P
Second Units	P	P	P	NP	NP	NP	NP
Mobile Home Units	NP	P	P	P	P	P	P
Mobile Home Parks	C ¹	C	C	C	C	C	C
Care Facility for 6 or Less	P	P	P	P	P	P	P
Care Facility for 7 or More	NP	NP	C	C	C	C	NP
Emergency Shelters	NP	NP	NP	NP	NP	NP	NP
Farmworker Housing	3	3	3	3	3	3	3

Sources: City of Rancho Cucamonga 2013-2020 Housing Element, p. HE-37, HE-61,; Development Code, Title 17, Article III, Chapter 17.30; Table 17.30.030-1: Allowed Land Uses And Permit Requirements By Base Zoning District.

1. P = Designates a use permitted by right / C = Designates a conditionally permitted use / NP = Designates a prohibited use / ASP = Designates a use permitted with an approved Specific Plan.
2. Permitted in conjunction with optional development standards.
3. As a consequence of the small population and rapidly declining agricultural production, no statistical need for housing has been identified for farmworkers. (p. HE-22)

Single and Multi-Family

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

According to the Economic Development portion of the City's General Plan update, developers "can respond to demands that are different from Rancho Cucamonga's traditional single-family neighborhoods through General Plan and zoning opportunities that allow construction of condominiums, apartments, compact and clustered detached housing, and townhomes. With a greater diversity of housing options, the City will be able to accommodate a resident workforce that meets the needs of local firms. Specifically, more workforce housing located near transit stops, the Metrolink station, and the proposed Bus Rapid Transit (BRT) line will be particularly critical to attract new residents that work in the local manufacturing and warehousing companies. Young professionals in office-based industries may prefer condominiums and apartments rather than detached housing on lots that require weekend time for maintenance and care. Higher-density attached housing types and mixed-use development along corridors will help stimulate underperforming commercial nodes and corridors, west Foothill Boulevard in particular."

Multi-family developments are permitted in the LM, M, MH, H and M-U zones. Multi-family applications in the LM district and single-family applications in the M district that propose the maximum density allowed in each respective district shall comply with the special development standards listed in Table 17.36.010-2 of the Rancho Cucamonga Municipal Code. Multi-family dwelling units are limited to one story within 100 feet of a VL or L district. The maximum densities are 8 dwelling units per acre in the LM; 14 dwelling units per acre in the M zone; 24 dwelling units per acre in the MH zone; 30 dwelling units per acre in the H zone, and 50 dwelling units per acre in the M-U zone.

Manufactured Housing and Mobile Home Parks

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

State law requires cities to permit manufactured housing and mobile homes on lots for single-family dwellings provided that the manufactured home meets the location and design criteria established in the Zoning Ordinance.¹ The City's Zoning Ordinance meets this requirement. State law also requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development.²

¹California Government Code, § 65852.3

²California Government Code § 65852.7

According to the latest Housing Element, "The City permits mobile home units in all residential districts, except the Very Low Residential District, subject to the same property development standards and permitting process as a single-family detached home. The Rancho Cucamonga Development Code broadly defines mobile homes to include "a moveable or transportable vehicle, other than a motor vehicle, having no permanent foundation other than jacks, piers, wheels, or skirting, designed as a permanent structure intended for occupancy and designed for subsequent or repeated relocation." The placement of a mobile home unit includes the following criteria: the unit must be placed on a permanent foundation, the unit must be certified under the National Mobile Home Construction and Safety Act of 1974, and the placement is subject to Design Review Committee review to determine 1) the design of the unit is similar in character and appearance to other buildings in the area and 2) all development standards (i.e., setback, height, lot coverage) of the base district apply." (p. HE-38)

The City also permits Mobile home parks in all residential districts subject to the approval of a Conditional Use Permit. The placement of those units must meet all development standards of the base district.

Rancho Cucamonga had eight mobile home parks with 1,531 mobile home units as of the date of the drafting of the Housing Element update. These units made up just 2.7 percent of the housing stock.

Accessory Units

Enacted in 2002, AB1866 requires cities to use a ministerial process to consider and approve accessory units proposed in residential zones.³ According to HCD, a local government must "...accept the application and approve or disapprove the application ministerial without any discretionary review..." 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.

The Housing Element states, "In 2003 Rancho Cucamonga adopted code requirements relative to second dwelling units identifying that these units are permitted subject to certain design and development standards. Rancho Cucamonga permits second units on lots zoned for single-family uses and all second units must meet the general standards of the zoning district for the lot, including density, setback, design, architectural style (i.e., materials, colors, roofing, scale, surface treatment, and architectural details) of the primary residence, and must meet current building codes. A second unit is approved ministerially as a by-right use provided the following criteria are met: the lot contains an

³California Government Code § 65852.2

existing single-family residence, the unit may be constructed as an accessory building or attached to the primary residence, and is not for sale but for rental purposes only or by use of an immediate family member. A second unit may be established on lots that are a minimum of 10,000 square feet; the unit shall not exceed 640 square feet if the lot is less than 20,000 square feet and 950 square feet if the lot is greater than 20,000 square feet. Additionally, the second unit is limited to one story, shall have its own entrance separate from the primary residence, and shall provide one enclosed parking space per unit." (p. HE-38)

Since the adoption of these second unit provisions, the City reports several inquiries regarding second units, but that only 1 second unit has been built during the preceding three years.

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. The City revised its Development Code in 2012 to allow all such facilities by right wherever single- or multi-family housing is allowed.

According to the Housing Element, "Rancho Cucamonga allows State-licensed residential care facilities serving six or fewer persons by right in all residential zones. In compliance with State law, these facilities are treated like any other residential use in the same single-family or multiple-family residential zones. The City also permits residential care facilities serving seven or more residents in the Medium, Medium High, and High residential districts subject to the approval of a Conditional Use Permit. . .The 2012 Development Code Update defined residential care facilities consistent with State law and specified the permitting processes required for these uses under State law. This ensures that licensed facilities are appropriately permitted in a manner consistent with the Government Code and fair housing law."

The City's Development Code contains the following definitions:

Residential care facility. "Consistent with the definitions of state law, a residential care facility provides 24-hour nonmedical care for more than six persons 18 years of age or older, or emancipated minors, with chronic, life-threatening illness in need of personal services, protection, supervision, assistance, guidance, or training essential for sustaining the activities of daily living or for the protection of the individual. This classification includes, but is not limited to, rest homes, residential care facilities for the elderly, adult residential facilities, wards of the juvenile court, and other facilities licensed by the State of California. Convalescent homes,

nursing homes, and similar facilities providing medical care are included under the definition of medical services, extended care."

*Residential care home*⁴. "Consistent with the definitions of state law (Health and Safety Code section 1502), a residential care home is a home that provides 24-hour nonmedical care for six or fewer persons 18 years of age or older, or emancipated minors, with chronic, life-threatening illness in need of personal services, protection, supervision, assistance, guidance, or training essential for sustaining the activities of daily living, or for the protection of the individual. This classification includes rest homes, residential care facilities for the elderly, adult residential facilities, wards of the juvenile court, and other facilities licensed by the State of California. Convalescent homes, nursing homes, and similar facilities providing medical care are included under the definition of "medical services, extended care."

Map IV-2 illustrates the distribution of such facilities throughout the City of Rancho Cucamonga. **Table IV-3** lists 28 licensed residential care facilities that provide accommodations to over 751 residents. Seven (7) of the facilities have capacities higher than 6 persons.

⁴ Rancho Cucamonga Municipal Code, Title 17, Article III, Section 17.32

Map IV-2
Licensed Residential Care Facilities in Rancho Cucamonga

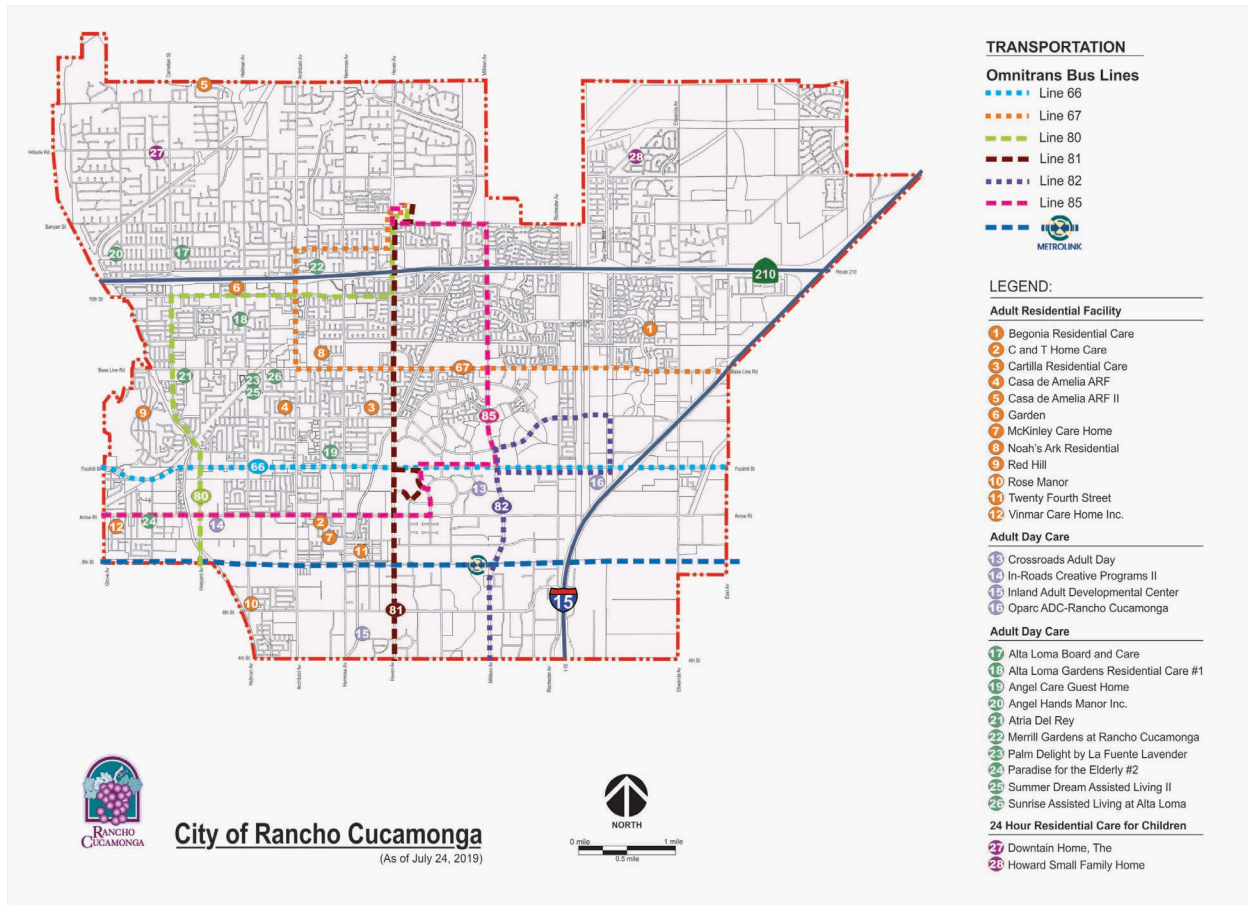


Table IV-3
Licensed Residential Care Facilities

No.	Facility	Address	Capacity
Adult Residential Facility			
1	Begonia Residential Care	12596 Begonia Avenue	4
2	C and T Home Care	8515 Ramona Avenue	6
3	Cartilla Residential Care	7642 Cartilla Avenue	6
4	Casa de Amelia ARF	7650 Jadeite Avenue	4
5	Casa de Amelia ARF II	4934 Delphin Place	1
6	Garden	9212 Garden Street	6
7	McKinley Care Home	9895 McKinley Street	4
8	Noah's Ark Residential	7179 Ramona Avenue	4
9	Red Hill	7628 Alta Cuesta Drive	4
10	Rose Manor	9254 Kirkwood	4
11	Twenty Fourth Street Adult Residence	10260 24th Street	6
12	Vinmar Care Home Inc.	8614 Vinmar Avenue	6
Adult Day Care			
13	Crossroads Adult Day Center	11130 White Birch Drive	110
14	In-Roads Creative Programs II	9057 Arrow Route #120/#130	45
15	Inland Adult Developmental Center	10221-B Trademark Street	45
16	Oparc ADC-Rancho Cucamonga	8333 Rochester Avenue #112	75
Elderly Assisted Living			
17	Alta Loma Board and Care	6368 Moonstone Avenue	6
18	Alta Loma Gardens Residential Care #1	6896 Mellman Avenue	6
19	Angel Care Guest Home	7979 Teak Way	6
20	Angel Hands Manor Inc.	6367 Marble Avenue	6
21	Atria Del Rey	8825 Baseline Road	145
22	Merrill Gardens at Rancho Cucamonga	9942 Highland Avenue	150
23	Palm Delight by La Fuente Lavender	7461 Hellman Avenue	6
24	Paradise for the Elderly #2	8568 Baker Avenue	6
25	Summer Dream Assisted Living II	7425 Hellman Avenue	6
26	Sunrise Assisted Living at Alta Loma	9519 Baseline Road	77
24 Hour Residential Care for Children			
27	Downtain Home, The	8599 Hillside Road	3
28	Howard Small Family Home	5555 Las Brisas	4
		Total	751

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

Emergency Shelters/Transitional Housing

According to the Housing Element, "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 made rulings supporting this State mandate. To that end, State Law (SB2) requires jurisdictions to designate at least a zone and a 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.

The Development Code defines emergency shelters as "short-term accommodations on a first-come, first serve basis, with no guaranteed bed for a subsequent night." [From Housing Element: Rancho Cucamonga previously permitted emergency shelters in the General Commercial District and General Industrial district, subject to the approval of a Conditional Use Permit, but not within any residential districts. In 2013, the City revised its Development Code to establish emergency shelters as a permitted land use within the General Commercial (GC) District without discretionary action; however, even with these provisions there are no emergency shelters located within the City. The City will amend the Development Code within one year of adoption of the Housing Element, or at the time of application submittal, whichever occurs first, to specifically establish procedures and development standards (i.e., maximum number of beds, provisions for onsite management, length of stay, off-street parking based on demonstrated need, proximity of other shelters, and security) to facilitate the creation of emergency shelters." (p. HE-39)

Transitional and Supportive Housing

According to the latest Housing Element update, the City amended its Development Code in 2012 to define transitional housing consistent with the California Health and Safety Code and to permit transitional housing facilities by right in all residential districts and only subject to those restrictions that apply to other residential dwellings of the same type in the same district. The City goes on to cite California Health and Safety Code §50675.2, which 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.

Previously, the Development Code defined transitional housing as uses that allow for an extended stay (longer than an immediate need for housing) and provide support services for the occupants (i.e., medical aid, employment, and housing counseling). However, the code did not permit the establishment of transitional housing uses within the City.

The 2012 Development Code Update also included updates to address supportive housing. Similar

to transitional housing, supportive housing can take several forms, including group quarters, single-family homes, and multi-family housing complexes. The Development Code was amended to permit supportive housing facilities by right in all residential districts and only subject to those restrictions that apply to other residential dwellings of the same type in the same district.

Supportive housing is affordable housing with onsite or offsite services that help a person or family with multiple barriers to employment and housing stability. Supportive housing is a link between housing providers and social services for the homeless, people with disabilities, and a variety of other special needs populations. California Health and Safety Code §50675.14 defines "supportive housing" as housing with no limit on length of stay, that is occupied by the target population (i.e., persons with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

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

Table IV-4
Fair Housing Impediment Study

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
Definition of "Family"	Regulatory	Yes	Family defined as "one or more individuals occupying a dwelling unit and living as a single household unit." (17.126.020 RC Municipal Code)	City definition of "Family" is consistent with definition set forth in State Codes.
Definition of "Disability"	Regulatory	Yes	No definition of "Disability" is contained in the Zone Code.	City uses "Disability" definition set forth in State Codes.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
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 2012, the City also revised the Development Code to include standards and policies to reasonably accommodate the housing needs of persons with disabilities.	City complies with State law. City encourages ADA access modifications.
Variances & Exceptions to zoning and land-use rules.	Regulatory	Yes	City requires a public hearing for a zoning variance as required by State law, except minor variances that are approved by the Zoning Administrator.	City complies with State law regarding the granting of variances and exceptions to zoning and land-use rules.
Residential Mixed Land Use Standards	Regulatory	Yes	City allows mixed land use development.	Approval of a Specific Plan is required for the entitlement of a mixed use project.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
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 2019 California Building Code regarding ADA access. (Ord. No. 956, § 3, 2019)
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 2019.	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.	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, 2020.

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

B. Development Policy

Development Standards

The Development Code of the City of Rancho Cucamonga provides policy guidance as to the location of housing and establishes minimum residential development standards to ensure quality of construction, preservation and protection of neighborhoods, and the furtherance of broader City

goals. **Table IV-4** highlights pertinent basic residential development standards in the City.

Table IV-4
Basic Residential Development Standards and Mixed-Use Standards

Standard	Very Low	Low	Low Medium	Medium	Medium High	High	M-U
Maximum	2	4	8 ¹	14 ¹	24	30	50
Minimum Lot Size (square feet)	20,000	7,200	5,000	3 acres ²	3 acres ²	3 acres ²	n/a
Maximum Lot Coverage (acres)	25	40	50	50	50	50	50%
Maximum Height (feet)	35	35	35	35 ³	40 ³	55 ³	75
Minimum Setback Front/Rear Yard (ft.)	42 ⁴ /60	37 ⁴ /20	32 ⁴ /15	37 ⁴ /10	n/a	n/a	50% - 75% reduction of streetscape requirements/ Match rear yard setback requirements of adjacent base district (0 feet if adjacent to commercial or industrial)
Required Parking Spaces	2	2	2	2	2	2	1.3 for Studio, up to 2.5 for 4 or more bedrooms (See Table 17.64.050-1)
Minimum Dwelling Unit Size							
Single Family (attached and	1,000 square feet						
Multi-Family	550 square feet						

Source: Rancho Cucamonga 2013-2020 Housing Element, p. HE-43; Rancho Cucamonga Municipal Code, Tables 17.36.010-1, 17.36.020-1, 17.36.020-2, and Table 17.64.050-1.

1. Developing multi-family in the LM District and single-family in the M District at the maximum density requires compliance with Standards for Higher Residential Densities as outlined in Subsection 17.36.020.D.
2. On existing lots of record, parcels less than 3 acres or less than the required minimum frontage may only be developed at the lowest end of the permitted density range.
3. Limit one story within 100 feet of VL or L District for multiple-family dwellings.
4. Front yard setbacks in new residential developments may be reduced by up to 5 feet to allow for variation in structural setbacks along the street.

Local Government Fees

Since the passage of Proposition 13 in 1978, local governments have had to diversify their revenue sources. As reliance on General Fund revenues declined, local governments began charging service fees and impact fees to pay for City services needed to support the development of new housing. The City currently charges fees and assessments to cover the costs of processing permits and providing services for residential projects.

Development fees depend on the location, project complexity, and cost of mitigating environmental impacts. **Table IV-6** provides the most common development fees charged for a typical residential project. Rancho Cucamonga's planning fees are generally higher than those in the smaller cities of Redondo Beach and Lawndale. These two cities also contract with the County of Los Angeles for much of their plan checking functions, with costs being set by the County.

Table IV-6
Discretionary Fees

Description	Fee*
Conditional Use Permit (Minor)	\$4,348
Conditional Use Permit (Major)	\$7,687
Conditional Use Permit (Major Modification)	\$3,966
Variance (Minor)	\$5,044
Variance (Major)	\$5,044
Tentative Tract Map	\$10,022 - \$15,000
Residential Parcel Map Review	\$7,616
Lot Line Adjustment	\$1,708 + 7% tech fee
General Plan Amendment	\$15,000
Zone Text Amendment	\$10,000
Negative Declaration (with or without Mitigation)	\$6,722
Environmental Impact Review (EIR)	\$45,000 + Consultant and City Attorney Fees
Appeal Planning Commission	\$3,037
Certificate of Compliance	\$2,664

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

Source: [City of Rancho Cucamonga Fee Schedule 2019](#)

Table IV-7 compares the minimum fees charged by Rancho Cucamonga with those of Rialto,

Jurupa Valley, and Fontana. 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 Rancho Cucamonga.

Table IV-7
Comparison of City Permit Fees

Permit	Rialto	Jurupa Valley	Fontana	Rancho Cucamonga
Conditional Use Permit	\$2,198.50 - \$3,109.10	\$9,646.14	\$3,285 - \$5,100	\$4,348 - \$7,687
Conditional Use Permit Modification	--	\$3,882.12	50% of CUP	50% of Original Fee - \$3,966
Variance	\$1,274.80	\$1,376 – \$2,625	\$3,275	\$5,044
Tentative Tract Map	\$5,684.90	\$9,004 - \$11,369	\$8,138 + \$30/Lot	\$10,022 - \$15,000
Tentative Residential Parcel Map	\$2,705.80 – \$4,279.90	\$5,621 - \$5,742	\$6,904 + \$100/acre	\$7,616
Lot Line Adjustment	\$754.40	\$683.40	\$2,200	\$1,708 + 7% tech fee
Zone Change	\$4,410	\$3,648.54	\$6,075	\$12,926
General Plan Amendment	\$3,920.50 minimum	\$7,479.66	\$6,600 - \$8,725	\$15,000
Zoning Regulation/Development Code (Text) Amendment	--	--	\$11,150	\$10,000
Appeal Planning Commission	\$1,313.80	\$964	65% of Original Filing Fee (with \$485.00 maximum)	\$3,037

Source: City websites, 2019.

[City of Rancho Cucamonga Fee Schedule 2019](#)

[City of Rialto Fee Schedule 2018](#)

[City of Jurupa Valley Fee Schedule 2019](#)

[City of Fontana Planning Cases & Application Fees 2019](#)

Impact Fees

Development impact fees are established for mitigating various development impacts based on the specific existing conditions of and projected needs for infrastructure and public facilities. Therefore,

comparing the levels of impact fees across communities does not recognize the unique circumstances for establishing these fees. Furthermore, impact fees are subject to the requirements of State law for ensuring reasonableness and proportionate share of responsibility.

The City has implemented development impact fees that are used for police facilities, park facilities, storm drain facilities and street and traffic signals. The total impact fees are presented **Table IV-8**. Developers can apply for a fee waiver if they can prove the lack of a nexus relationship between the proposed development and the fees charged.

Table IV-8
Development Impact Fees

Type of Fee	Single-Family	Multi-Family
Building Inspection	\$785.94	\$2,886.37
Plan Review	\$1,041.83	\$3,826.12
WQMP	\$397.80	\$397.80
Drainage	\$3,559.60	\$38,764.00
Transportation	\$4,654.00	\$44,672.00
Beautification	\$44,672.00	\$3,360.00
Park Development	\$4,396.00	\$44,368.00
Water and Sewer (CVWD)	\$16,425.00	\$223,068.00
School Fees	Calculated by applicable School District	
Total	\$31,513.18	\$361,342.30

Source: 2013-2020 Housing Element, p. HE-52; Rancho Cucamonga 2013 City Fee Schedule.

The reduction of impact fees would diminish services that maintain the quality of life in neighborhoods. Given the modest level of City-controlled fees, they are not deemed to be a constraint to the production of housing in Rancho Cucamonga.

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 Rancho Cucamonga constitute a modest percentage of housing sales prices, the fees are necessary to provide an adequate level of urban services and to mitigate the impacts of housing development. To facilitate affordable housing development and to off-set the impact of these fees

on development costs, the City has the ability to consider a waiver of the fees based on information presented to the City Council at a public hearing.

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.

The City of Rancho Cucamonga has adopted the 2010 edition of the California Building Code, which includes the State Green Building Code. California cities are required to adopt the California Building Standards Code (Title 24 of the California Code of Regulations). The Code is a set of uniform health and safety codes covering building, electrical, mechanical, plumbing, fire safety, and other issues. Uniform codes are considered the minimum acceptable standards for health and safety. The California Building Standards Commission updates these codes every three years based on updates to uniform codes adopted by professional associations (such as the ICBO).

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. To address local conditions requiring more stringent or particular standards, the City has replaced or amended certain sections of the 2007 California Building Code. Those changes to the Building Code, do not directly or indirectly limit the type of housing opportunities available to disabled persons nor do they limit access to housing. All local amendments are intended to strengthen and enhance building and safety standards to provide safer housing opportunities and disabled access to housing in excess of California Code's current requirements.

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.⁵

The U.S. Department of Housing and Urban Development (HUD) also recommends, but does not require, that the design, construction and alteration of housing units incorporate, wherever practical, the concept of visibility. This recommendation is in addition to requirements of Section 804 of the Fair Housing Act. Recommended construction practices include wide enough openings for bathrooms and interior doorways and at least one accessible means of egress/ingress for each unit.⁶

The City's adopted Building Code contains and incorporates the latest accessibility standards promulgated by the state and federal government. The City checks plans for compliance with State and Federal accessibility law so that privately owned and publicly assisted housing with four or more units meets accessibility requirements of the Fair Housing Act. The City of Rancho Cucamonga enforces all federal and state accessibility laws but does not require accessibility standards in excess of state and federal law.

Reasonable Accommodation

In 2001, the State Office of the Attorney General issued a letter encouraging local governments to adopt a reasonable accommodation procedure.⁷ The Department of Housing and Community Development has also urged the same. The federal Fair Housing Act and California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodation when such accommodation may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The State Attorney also provided guidance on the preferred procedure.

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

In 2012, the City revised the Development Code to include standards and policies to reasonably accommodate the housing needs of persons with disabilities. The City's planning director 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

⁵Section 804(f)(3)(C) of the Fair Housing Act.

⁶ HUD Directive, Number 00-09.

⁷State Office of Attorney General, May 15, 2001.

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 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.⁸ The City makes available to applicants and developers a procedural guide and checklist for submitting applications.

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

⁸Government Code Section 65920 et seq.

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 can provide 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 primary importance: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.⁹

Community Representation

The City values citizen input on how well city government serves its residents. The City Council relies on its Planning Commission, advisory commissions, and boards to provide advice and recommendations in areas of City services. Rancho Cucamonga makes an effort to ensure that advisory boards and commissions reflect the diversity of the City's residents. The Planning Commission makes recommendations to the City Council that have the potential to affect land use, building, and other policies that may impact fair housing choice.

Residential Anti-Displacement Policy

It is the policy of the City of Rancho Cucamonga 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 Rancho Cucamonga 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

⁹Government Code Section 65589.5

General Plan and Housing Element. This section addresses how Rancho Cucamonga furthers fair housing for its residents through housing, service, and transit policies.

This section first provides details on how the City of Rancho Cucamonga 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. Rancho Cucamonga's Housing Element identifies five (5) main issue categories that focus on the following:

- Conservation of the existing affordable housing stock;
- Providing adequate housing sites to accommodate the future housing needs for all income segments of the community;
- Assisting in the provision of affordable housing;
- Removing government and other constraints to housing development; and
- Promoting fair and equal housing opportunities for all Rancho Cucamonga residents.

The City has defined the following overarching Housing Element goal: Provide opportunities and incentives for the provision of a variety of housing types for all economic segments wishing to reside in the community regardless of race, religion, sex, or income group. Following are the issues and policies to be implemented in the City to achieve its housing goals during the 2013-2021 Housing Element planning period:

Goal HE-1: Allow and create new opportunities that enable a broad range of housing types, maintain a balanced supply of ownership and rental units, and provide sufficient numbers of dwelling units to accommodate expected new household formations.

Objective HE-1.1: Ensure a wide range of housing alternatives and enable the City to achieve its share of the RHNA through the utilization of land use distribution and development standards to encourage a mix of housing types, including mobile homes and apartments, within a variety of price ranges.

- Policy HE-1.1.1: Provide opportunities for a variety of housing types through implementation of the Land Use Plan, Development District Map, and Community Plans.
- Policy HE-1.1.2: Review and amend provisions of the Development Code pertaining to mobile homes to allow manufactured homes in all residential districts.

-
- Policy HE-1.1.3: Discourage the conversion of existing mobile home parks to other uses.

Goal HE-2: Provide housing opportunities that meet the needs of all economic segments of the community including very low, low-, and moderate- income households and special needs groups.

Objective HE-2.1: Protect and expand the range of housing opportunities available by location, price, and tenure to low- and moderate-income households.

- Policy HE-2.1.1: Offer Development Agreements to provide incentives for the development of senior and/or family affordable multi-family rental units.
- Policy HE-2.1.2: Implement the Affordable Housing Incentives/Density Bonus Provisions with for profit and non-profit developers to provide affordable housing opportunities.
- Policy HE-2.1.3: Encouraging use of Federal rental assistance programs to assist lower income households and support the Housing Authority of the County of San Bernardino (HACSB) applications for additional vouchers to meet the needs of low-income households.
- Policy HE-2.1.4: Support the Mobile Home Park Accord voluntary rent stabilization as a means of keeping rents at reasonable levels.

Objective HE-2.2: Promote efforts to define both the size and composition of the homeless population in order to assess existing and future needs, and support a multi-jurisdictional comprehensive approach toward addressing those needs.

- Policy 2.2.1: Conduct an annual survey of area non-profit service providers in order to determine the homeless needs within the City.

Objective HE-2.3: Assist providers of temporary emergency shelter and transitional housing opportunities.

- Policy HE-2.3.1: Assist the efforts of local organizations and community groups to provide temporary emergency shelters, transitional housing opportunities, and services to the City's homeless population.
- Policy HE-2.3.2: Participate with adjacent communities toward the provision of a sub-regional shelter program and encourage the County to develop a comprehensive homeless program.

Objective HE-2.4: Recognize the unique characteristics of elderly and handicapped households and address their special needs.

- Policy HE-2.4.1: Continue to allow for the establishment of second units on single-family residential lots to provide additional housing opportunities pursuant to State

law and established zoning regulations.

- Policy HE-2.4.2: Enforce and regulate the disabled accessibility and adaptability standards contained in Title 24 of the California and Uniform Building Codes as they apply to apartments, condominium, and townhouse projects.

Goal HE-3: Provide quality residential environments which contribute to a well- functioning community by ensuring residential development which is not only attractive in design, but which functions to protect the public safety and welfare, and provide benefits to the community.

Objective HE-3.1: Promote development techniques that foster a continued high quality of residential design and construction and ensure the appropriate development of hillside areas.

- Policy HE-3.1.1: Continue to implement the Hillside Development Regulations to ensure that residential development is appropriate in the City's hillside areas.
- Policy HE-3.1.2: Continue to evaluate residential projects for safety concerns, including lighting, pedestrian movements, parking lot configuration and design, as well as unit design and orientation, particularly with regard to multi-family development.
- Policy HE-3.1.3: Promote the development of Crime Prevention through Environmental Design (CPTED) concepts to evaluate single-family and multi-family residential developments and write CPTED design guidelines to improve the safety of new residential developments.

Goal HE-4.: Conserve and improve the existing housing stock, including structures of historic significance, and eliminate the causes and spread of blight by encouraging the investment of public and private funds in housing rehabilitation and public improvements.

Objective HE-4.1: Recognize the unique contribution to the City's heritage by historic structures and develop programs to encourage the preservation and maintenance of these structures.

- Policy HE-4.1.1: Encourage rehabilitation and preservation of historic residences through participation in Mills Act contracts.

Objective HE-4.2: Promote the revitalization and rehabilitation of substandard residential structures.

- Policy HE-4.2.1: Evaluate and identify areas of the City with concentrations of older or deteriorating housing units which may be targeted for rehabilitation and improvement programs.
- Policy HE-4.2.2: Continue to implement the Home Improvement Program administering grants to lower income single-family home owners and mobile home owners for minor housing needs.
- Policy HE-4.2.3: Continue to implement the Home Improvement Program

administering deferred interest loans to lower income households, excluding mobile homes.

Objective HE-4.3: Promote efforts to ensure that all neighborhoods of the City have adequate public/community facilities and services.

- Policy HE-4.3.1: Provide public improvements/community facilities such as street improvements, streetlights, sidewalks, parkway landscaping, as well as park facilities in qualified target areas.

Objective HE-4.4: Promote the maintenance of existing housing in sound condition.

- Policy HE-4.4.1: Utilize concentrated Code Enforcement programs to target specific areas or problems when the need and community support warrants such activity.
- Policy HE-4.4.2: Develop an outreach referral program to encourage property owners with structural and/or maintenance problems to seek assistance under the CDBG Home Improvement Program.

Goal HE-5: Where possible, eliminate governmental constraints.

Objective HE-5.1: Promote efforts to reduce procedural delays, provide information early in the development process regarding development costs, and charge only those fees necessary to adequately carry out needed public services and improvements.

- Policy HE-5.1.1: Periodically review and update the City's fee schedule and the methodology on which the fees are based in order to determine the necessary costs for providing adequate public services and public improvements to ensure the continued health, safety, and welfare of the community.
- Policy HE-5.1.2: Continue to facilitate the development review process through multiple techniques, including staff assistance, public information, articles in the City's newsletter, informal meetings with applicants, Preliminary Review applications to address technical issues, and Pre-Application Review to address policy issues.
- Policy HE-5.1.3: Continue to evaluate and adjust as appropriate residential development standards, regulations, and processing procedures that are determined to constrain housing development, particularly housing opportunities for lower and moderate income households and for persons with special needs.

Goal HE-6: Promote equal housing opportunities for all economic segments of the community regardless of race, sex, or religion.

Objective HE-6.1: Pursue programs that will reduce the incidence of housing discrimination within

the City.

- Policy HE-6.1.1: Support outreach and education efforts to actively further fair housing practices and understanding of fair housing rights, with emphasis on proactive education and voluntary compliance, as well as through legal enforcement on a case-by-case basis, including, but not limited to, assistance with the resolution of tenant/landlord disputes and housing discrimination complaints.
- Policy HE-6.1.2: Promote the provisions of disabled-accessible units and housing for the mentally and physically disabled.

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

Homeowner Rehabilitation Program

The City of Rancho Cucamonga offers several programs to assist homeowners maintain and improve their homes, both single-family and mobile homes. The Housing Element describes them as follows:

- Home Improvement Program (CDBG Grants): This program provides a grant up to \$7,500 to income eligible low-income households to make necessary health, safety, and code related repairs. Eligible properties include single-family homes, mobile homes, townhomes, and condominiums and the units must be owner occupied. This program may be utilized in conjunction with the loan program (see below) if the cost of repairs exceeds the maximum grant amount.
- Home Improvement Program (CDBG Loans): This revolving loan program provides a deferred payment loan up to \$30,000 to income eligible low-income households to make necessary health, safety, code related, and cosmetic repairs depending on fund availability. Eligible properties include single-family homes, townhomes, and condominiums and the unit must be owner occupied. The loans are zero interest, subordinate to the primary loan, and are repaid on the sale or refinance of the property.
- Home Improvement Program (EECBG Loans): This revolving loan program provides a deferred payment loan up to \$10,000 to income eligible low-income households to make necessary energy efficiency and energy conservation repairs. Eligible properties include single-family homes, townhomes, and condominiums and the unit must be owner occupied. The loans are zero interest, subordinate to the primary loan, and are repaid on the sale or refinance of the property. This loan program is funded by the American Recovery and Reinvestment Act of 2009 and is distributed through the U.S. Department of Energy.

Housing Choice Voucher Program

Under this program, which is implemented through the San Bernardino 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.

San Bernardino 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.

Preservation of At-Risk Units

Many households residing in publicly assisted housing are extremely low-income households with limited housing opportunities elsewhere. To meet the needs of lower income households, the City must plan against the loss of existing affordable housing units.

The latest City of Rancho Cucamonga Housing Element, 2013-2021, which was adopted May 19, 2010, contains an at-risk housing analysis for the period that extends through October 1, 2021. The underlying income use restrictions of these projects were reviewed for potential conversion to market rate during this planning period. These projects are listed in Table HE-30 of the Housing Element (p. HE-29), with detailed information. Five (5) housing developments were at risk of conversion as of the time of the drafting of the Housing Element.

Combined, a total of 265 assisted units will be at risk of converting to market rate by October 2021. These projects are assisted by County of San Bernardino CDH with participation in the County's mortgage revenue bond program, State bond financing, and HUD; affordable units were restricted for periods of 30 to 40 years. The Mortgage Revenue Bond program facilitates the construction of bond-financed projects wherein the property owner deed-restricts the units as affordable housing to low-income households in exchange for preferential financing. The identified units were restricted through the property owner's participation with the County's bond program, and did not include the City's participation. Those units not at-risk of conversion to market rate after October 1, 2021 were restricted through regulatory agreements between owners and the Rancho Cucamonga RDA, with funding by 20 percent Set-Aside funds and CTCAC financing. Affordable units assisted by the RDA were restricted for a period up to 99 years.

Neighborhood Stabilization Program

The Housing and Economic Recovery Act of 2008 (HERA) appropriated \$3.92 billion in emergency assistance for the redevelopment of abandoned and foreclosed homes and residential properties. Grants under the HERA are considered Community Development Block Grant (CDBG) funds and

are implemented by HUD through the Neighborhood Stabilization Program. Rancho Cucamonga is a direct recipient of NSP funds and received \$2,133,397 to address foreclosure issues within the City. The City's NSP program operates two activities 1) an Acquisition/Rehabilitation and Resale – First Time Homebuyer Program where acquired properties will be available to households earning up to 120 percent of the AMI, and 2) an Acquisition/Rehabilitation and Reuse – Affordable Housing Program where acquired properties will be available to households earning below 50 percent of the AMI. These programs are available in selected census tracts experiencing a high foreclosure risk.

The Housing Element details the following Timeframe and Objectives:

- Acquire 12 properties for participation in the two NSP funded activities making 10 properties available through the Acquisition/Rehabilitation and Resale program and 2 properties available to local non-profit housing providers through the Acquisition/Rehabilitation and Reuse program.
- Implement program close out consistent with HUD's "Notice of Neighborhood Stabilization Program; Close Out Requirements and Recapture."

Density Bonus Program

As stated in the City's Housing Element, "Affordable Housing Incentives/Density Bonus Provisions assist in the development of affordable housing opportunities in accordance with Government Code §65915-65918. These provisions allow a density bonus and other regulatory concessions to provide incentives for "the production of housing for very low income, lower income, moderate income, and senior households" to "facilitate the development of affordable housing" within the City. The provisions function by allowing a reduction in development standards in exchange for the development of affordable housing units. Based on the number of units provided and the percentage of those units designated for low, very low, and senior households, the applicant may request a density bonus and/or other regulatory concessions to facilitate the development. Regulatory concessions act as incentives, which can include reduced building setbacks, reduced open space, increased lot coverage, increased maximum building height, reduced on-site parking standards, reduced minimum building separation requirements, or other site or construction conditions applicable to residential development. However, the caveat regarding the density bonus is that the development incentive granted shall contribute significantly to the economic feasibility of providing the target units.

When implemented the Density Bonus Provisions allow for an increased project density when site conditions would normally warrant a reduced project density. Depending on the number of units held for low or very low-income households, the applicant may request up to three incentives and a density bonus. When properly implemented, a density bonus may increase the maximum allowable residential density of a project by up to 35 percent."

Fair Housing Program

The Housing Element states, "The City of Rancho Cucamonga is committed to furthering and improving fair housing opportunities so that all persons have the ability to find suitable housing in the community. To achieve fair housing goals, the City contracts with the Inland Fair Housing and Mediation Board to provide fair housing services and landlord/tenant counseling services, including education, counseling, mediation, outreach, and legal compliance."

Public Services and Facilities

A variety of public services and facilities are available to Rancho Cucamonga 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	10500 Civic Center Drive
Public Works Service Center	8794 Lions Street
Metrolink Train Station	11208 Azusa Court
Animal Care & Adoption Center	11780 Arrow Route
Household Hazardous Waste Facility	8794 Lions Street
Paul A. Biane Library	12505 Cultural Center Drive
Archibald Library	7368 Archibald Avenue
Amethyst Fire Station - 171	6627 Amethyst Street
San Bernardino Road Fire Station - 172	9612 San Bernardino Road
Day Creek Fire Station - 173	12270 Fire House Court
Jersey Fire Station - 174	11297 Jersey Boulevard
Banyan Fire Station - 175	11108 Banyan Street
East Ave Fire Station - 176	5840 East Avenue
Hellman Fire Station - 177	9270 Rancho Street
All Risk Training Center	11297 Jersey Boulevard
Rancho Cucamonga Fire Protection District	10500 Civic Center Drive
Rancho Cucamonga Police Department	10510 Civic Center Drive
RCPD Victoria Gardens Substation	7743 Kew Avenue
Epicenter Sports Complex	8408 Rochester Avenue
Goldy S. Lewis Community Center / James L. Brulte Senior Center	11200 Base Line Road

Public Facility	Location
Lions Center East	9191 Base Line Road
Lions Center West	9161 Base Line Road
RC Family Resource Center	9791 Arrow Route
RC Sports Center	8303 Rochester Avenue
Victoria Gardens Cultural Center	12505 Cultural Center Drive
Bear Gulch Park	9094 Arrow Route
Beryl Park East	6525 Beryl Street
Beryl Park West	6501 Carnelian Street
Central Park	11200 Base Line Road
Church Street Park	10190 Church Street
Coyote Canyon Park	10987 Terra Vista Parkway
Day Creek Park	12350 Banyan Street
Ellena Park	7139 Kenyan Way
Etiwanda Creek Community & Dog Park	5939 East Avenue
Garcia Park	13150 Garcia Drive
Golden Oak Park	9345 Golden Oak Road
Heritage Park	5546 Beryl Street
Hermosa Park	67878 Hermosa Avenue
Kenyon Park	11481 Kenyon Way
Legacy Park	5858 Santa Ynez Place
Lions Park	9161 Baseline Road
Los Amigos Park	8625 Madrone Avenue
Milliken Park	7699 Milliken Avenue
Mountain View Park	11701 Terra Vista Parkway
Old Town Park	10033 Feron Boulevard
Olive Grove	13931 Youngs Canyon Road
Ralph M. Lewis Park	7898 Elm Street
Rancho Summit Park	5958 Soledad Way
Red Hill Community Park	7484 Vineyard Avenue
Spruce Park (Skate Park Facility)	7730 Spruce Avenue
Victoria Arbors Park	7429 Arbor Lane
Victoria Groves Park	6840 Fairmont Way
Vintage Park	11745 Victoria Park Lane
West Greenway Park	7756 Meadowcrest Court

Public Facility	Location
Windrows Park	6849 Victoria Park Lane

Source: City of Rancho Cucamonga, 2019, <https://www.cityofrc.us/community-services>

Employment in Rancho Cucamonga

A variety of career opportunities are available in Rancho Cucamonga with large employers. These entities mainly employ residents in the education, medical, and municipal realms, but they also include manufacturing interests unique to the area, such as Mission Foods and the Coca Cola Bottling Company, now the City's 12th largest employer. The retail sector is also well-represented, with Macy's, and Bass Pro Shops at numbers 9, and 11, respectively. The city's top ten employers are shown in **Table IV-10**.

Table IV-10
Principal Employers

Employer	Number of Employees	% of Total City Employment	Type of Business
Etiwanda School District	2,387	2.55%	Education
Chaffey Community College	2,120	2.27%	Education
Inland Empire Health Plan (IEHP)	2,078	2.22%	Medical
Mission Foods	950	1.02%	Manufacturing
Alta Loma School District	940	1.01%	Education
City of Rancho Cucamonga	761	0.81%	Municipal
Amphastar Pharmaceutical	657	0.70%	Medical
Mercury Insurance Company	640	0.68%	Insurance
Macy's	625	0.67%	Retail
Central School District	608	0.65%	Education
Total	11,766	12.58%	

Source: City of Rancho Cucamonga Comprehensive Annual Financial Report, Year ended June 30, 2019.

Housing—Employment—Transportation Linkage

In compliance with ADA and Title VI of the Civil Rights Act, Omnitrans Access Service is an Americans with Disabilities Act (ADA) mandated public transportation service for people unable to independently use the fixed route bus service in South Western San Bernardino County for all or some of their trips. Access provides curb-to-curb service to complement the Omnitrans fixed-route bus system, and is available during the same periods that fixed-route service operates. (Passengers requiring a higher level of assistance from their origin to destination, due to an impairment-related condition, will need to contact Omnitrans to identify a reasonable accommodation that can be provided to assist their transportation.) The Access service area is up to 3/4 mile on either side of an existing bus route. Access riders make reservations for their trips, or arrange a subscription service. Reservations can be made up to seven days in advance but no less than the day before the scheduled trip. Reservation hours are daily, including holidays, from 8:00 a.m. to 5:00 p.m.

Omnitrans implemented a bus fare change, as of Monday, September 2, 2019. Transit fares depend on the type of user and number of trips purchased. The standard single ride full fare is \$2.00 for a one-way trip, with seniors, disabled persons, Medicare recipients, and veterans eligible for a discounted rate of \$0.90. Children under 46 inches tall may ride Omnitrans busses for free. Day passes are available for \$6.00, with seniors, disabled persons, Medicare recipients and veterans receiving the discounted rate of \$2.75. A 7-trip pass is available for \$20.00, with a discounted fare of \$15.00 available to youth, and a fare of \$9.00 available to seniors, persons with disabilities, Medicare recipients, and veterans. A 31-day pass is available for \$60.00, with a \$45.00 fare for youth, and a discounted fare for seniors, veterans and disabled persons of \$30.00.

Metrolink is a premier regional rail system, including commuter and other passenger services, which links people to employment and activity centers. Services run Monday through Friday and Saturday for certain routes. Rideshare is approximately 11,000 riders per week for the San Bernardino area. The San Bernardino (Red) Line through Rancho Cucamonga bound for Los Angeles Union Station begins at 4:14 a.m. and ends at 8:11 p.m. Fare costs vary by distance but a one-way fare for the above trip is \$8.00, and a round-trip fare is \$16.00. Multi-day and monthly passes are available at reduced rates. Tickets may now be purchased on mobile phones by means of the Metrolink app for Android or Apple.

Table IV-11
Bus Lines in Rancho Cucamonga

Route	Description
66	Route 66 serves Rancho Cucamonga and Montclair via Foothill. Popular Destinations include Epicenter Stadium, Rancho Cucamonga Metrolink, Foothill Market Place, Montclair Civic Center, Montclair Metrolink, Montclair Plaza, Rancho Cucamonga

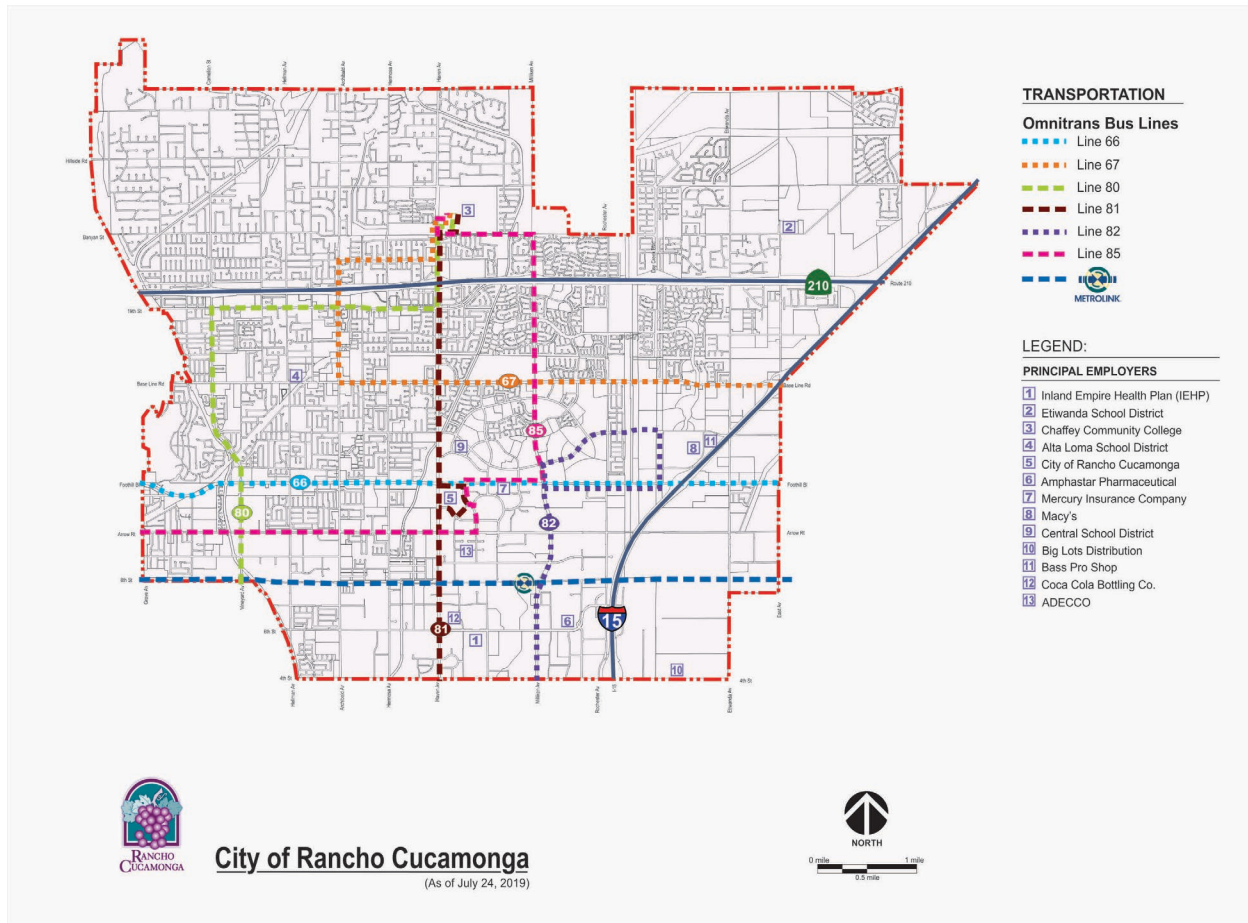
	Civic Center, Rancho San Antonio Medical Center, San Antonio Hospital, Upland High School.
67	Route 67 serves Montclair and Rancho Cucamonga via Mountain, Baseline and Sierra weekdays only. Popular Destinations include A.B. Miller High School, Alta Loma High School, Chaffey College, Etiwanda High School, Rancho Cucamonga Metrolink, Montclair Metrolink, Montclair Transit Center, Rancho Cucamonga High School.
80	Route 80 serves the Ontario International Airport via Terminals 2 and 4 on Airport Drive, the Ontario Convention Center and Rancho Cucamonga. Popular Destinations include Alta Loma High School, Chaffey College, Montclair Metrolink, Montclair Transit Center, Ontario Convention Center, Ontario International Airport, San Bernardino Department of Human Services (Ontario).
81	Route 81 serves Ontario and Rancho Cucamonga via Ontario Mills Mall, weekdays only. Popular Destinations include Chaffey College, Citizens Business Bank Arena, Colony High School, Kaiser Medical Office (Ontario), Los Osos High School, Ontario Civic Center, Ontario International Airport, Ontario Mills Mall, Chino Transit Center.
82	Route 82 serves Rancho Cucamonga and Sierra Lakes via Jurupa and Sierra Lakes. Popular destinations include Citizens Business Bank Arena, Rancho Cucamonga Adult School, Rancho Cucamonga Metrolink, Jurupa Hills High School, Kaiser High School, Kaiser Hospital (Rancho Cucamonga), Ontario Mills Mall, Rancho Cucamonga Civic Center, Rancho Cucamonga Metrolink, San Bernardino County Office (Rancho Cucamonga), Summit High School and Victoria Gardens.
85	Service between the Chino Transit Center, Montclair, Chino Civic Center and Chino Transit Center. Popular Destinations include Chino Transit Center, Chino Civic Center, Chino High School, Montclair Plaza, Montclair Transit Center, Upland Civic Center, San Antonio Hospital, Kaiser Clinic Rancho Cucamonga, Los Osos High School Rancho Cucamonga, Chaffey College.

Source: Omnitrans, 2020.

Omnitrans and Metrolink maps as of March 2020 indicate that the City of Rancho Cucamonga is well served. **Maps IV-4 and IV-5** show employers and public facilities in relation to public

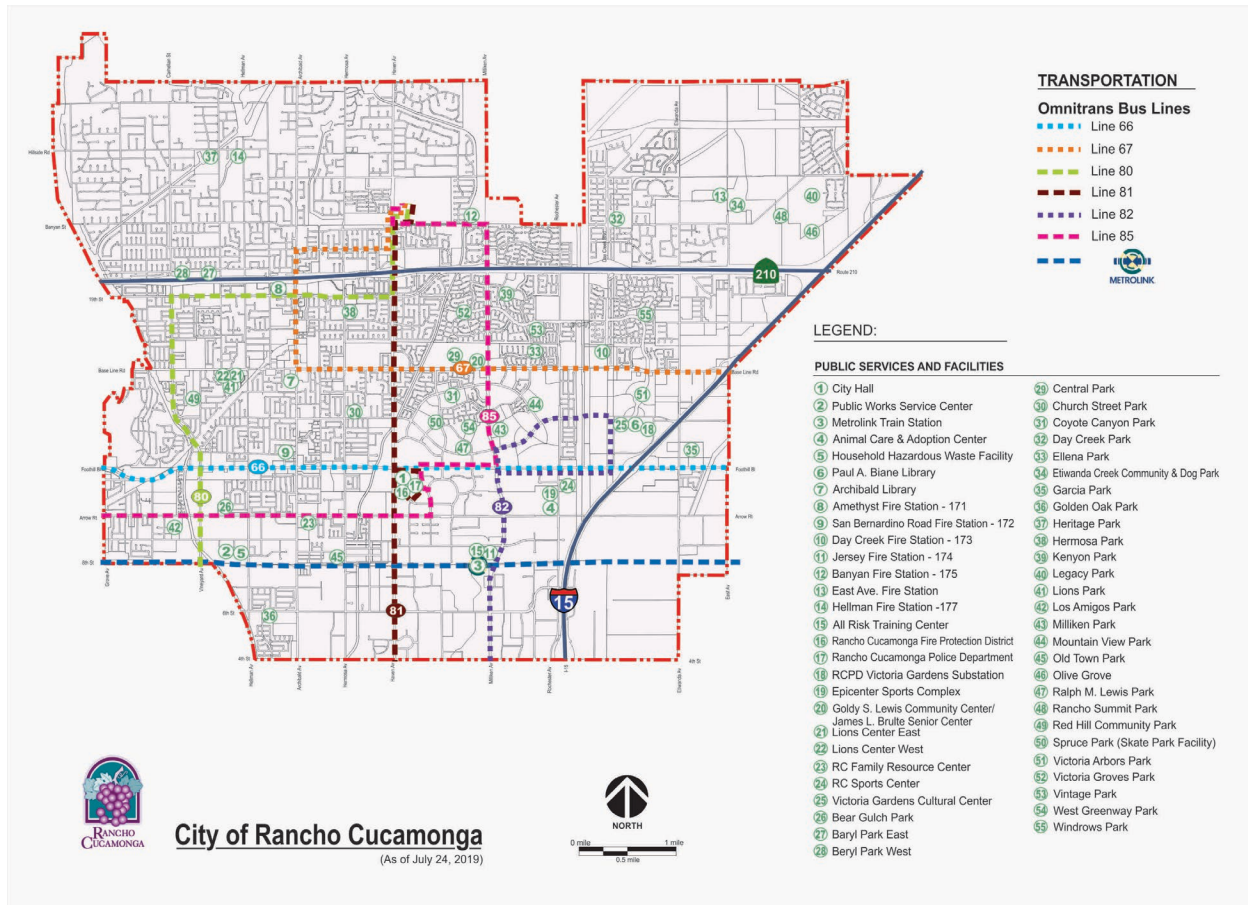
transportation routes. The current Omnitrans fixed routes are reflected on the map, which indicates that the major employers and public facilities within the City of Rancho Cucamonga are all well-served by public transportation lines within 3/4 of a mile from a transit line. Based on this analysis, it appears that major transit lines serve areas in the central core of the City with high concentrations of affordable rental housing developments and assisted housing.

Map IV-4
Transit Access to Employers



Source: Rancho Cucamonga Comprehensive Annual Financial Report, year ending June 30, 2018.

Map IV-5
Transit Access to Public Facilities



Source: City of Rancho Cucamonga websites, 2019.

A few public parks and fire stations are located more than a mile away from transit; however, most public facilities including other public parks are situated within three quarters of a mile of fixed route transit.

V. Current Fair Housing Activity

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

The City of Rancho Cucamonga has contracted with Inland Fair Housing and Mediation Board (IFHMB) to provide fair housing and related services to residents. Established in 1980, IFHMB is a non-profit, public benefit corporation that provides information about fair housing rights under the law, comprehensive housing counseling services, mediation services for the resolution of disputes, and information concerning shared housing opportunities and needs among senior citizens. IFHMB serves as an intermediary to resolve issues related to housing discrimination, homeownership and housing sustainability, rental complaints, and disputes in court, with the goal of empowering individuals and enriching the communities they serve. IFHMB provides services to over 40,000 individuals annually throughout County of San Bernardino representing a multiplicity of racial, ethnic, age, and income groups.

Funded primarily with Community Development Block Grant (CDBG) funds, IFHMB provides programs and services focused on eliminating housing discrimination, general housing assistance, and education and outreach activities to residents in the County of San Bernardino as well as residents in the City of Indio and Cathedral City in Riverside County, the City of Pomona in Los Angeles County, and the City of El Centro in Imperial County. The comprehensive Fair Housing Programs includes:

- **Community-Based Mediation:** IFHMB provides trained mediators to provide education and information regarding rights and responsibilities under the California Landlord-Tenant laws and help to resolve conflicts between landlords and tenants (including mobile homes). IFHMB contracts with San Bernardino County to provide mediation in small claims and unlawful detainer lawsuits in County courts.
- **Education/Outreach:** IFHMB provides education and outreach services to landlords and tenants, Realtors, newspapers, service organizations, schools, persons with Limited English Proficiency, and others interested in learning about fair housing laws. IFHMB also provides HUD-certified counseling to homeowners who are delinquent on FHA loans or seniors interested in reverse equity mortgage loan programs. Fair housing workshops and newsletters are also provided on a quarterly basis.
- **Senior Services:** IFHMB actively and successfully mediates conflicts between seniors and Social Security, Medi-Cal, utility companies, collection agencies, neighbors, and others. IFHMB also

provides a Care Referral Service, offers help in filing for HEAP and Homeowner/Renter Assistance, and maintains a list of senior housing and care homes.

- **Alternative Dispute Resolution:** The California Dispute Resolution Programs Act of 1986 provides the authority for mediation in the court system. Inland Fair Housing and Mediation Board has a contract with the County of San Bernardino to provide mediation in civil, family, probate, small claims, and unlawful detainer lawsuits in all of the courts in San Bernardino County.
- **Mobile Home Mediation:** IFHMBs mediators are trained to handle the specialized problems based on the Mobile Home Residency Law (MRL) that reflects the dual ownership and unique life style of mobile home communities. They provide education and information to residents and parks about the MRL, as well as provide information to both sides when fair housing issues are presented, and when requested serve as neutral third parties to facilitate resolution of conflicts.

A. Fair Housing Education

IFHMB provides comprehensive and extensive education and outreach programs and services throughout their service area. The purpose of these programs is to educate tenants, landlords, owners, realtors, city staff, code enforcement, elected officials, and property management companies on fair housing laws; to promote media and consumer interest in fair housing, and to secure grass roots involvement within the community. IFHMB conducts outreach and education activities that are vital to improve compliance with the law as follows:

- **Conduct Training Workshops for Consumers:** The general types of activities conducted for consumers are tenant workshops, booths at community events and presentations to community based organizations. Training may include Federal and State Housing Law, Lending information, and First Time Home Buyer information.
- **Conduct Training Workshops for Housing Providers:** The general types of activities conducted for housing providers include landlord workshops, design and construction requirements for multi-family housing, suggestions to avoid discriminatory advertising, and suggested actions to avoid discrimination complaints.
- **Increase Public Awareness:** The general types of activities conducted to increase public awareness includes submitting public service announcements, distributing literature, paid advertisements and published articles. This may include brochures about discriminatory activities and presentations on fair housing rights and responsibilities.

-
- **Conduct Training Workshops for City Staff and Elected Officials, Code Enforcement Officers, Law Enforcement, etc.:** The general types of activities conducted for city staff, elected officials, code enforcement officers and law enforcement include workshops regarding landlord-tenant rights and responsibilities, education regarding the duty to affirmatively further fair housing (AFFH), accessibility concerns for persons with disabilities, and how to engage the community in the AFFH planning process.

B. Fair Housing Enforcement

Discrimination Complaint Intake and Investigation

IFHMB responds to discrimination inquiries and complaints in an expedient manner, relying on over 30 years of experience in the industry. Determining whether a client is inquiring regarding a fair housing discrimination problem or a non-discrimination landlord/tenant or other problem can be difficult. Often what may appear at first to be a simple landlord/tenant dispute turns out to be a situation where a landlord has violated one or more fair housing laws. While many of the cases IFHMB are presented with no longer involve a discriminatory policy, such as “No Hispanics need apply,” many cases involve a discriminatory application of a facially neutral policy, such as different eviction timelines for minorities.

IFHMB investigates allegations of discrimination based on a person’s status as a member of one of the State or Federal protected categories, which include: Race, Color, Religion, National Origin, Sex, Familial Status, Disability, Marital Status, Sexual Orientation, Ancestry, Age, Source of Income, and Arbitrary Characteristics. Race, Color, Religion, National Origin, Sex, Familial Status, and Disability are the categories protected by the federal Fair Housing Act. The State of California provides protection from discrimination based on all seven of the federal protected categories and has added Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics as additional protected classes under state law.

Once a fair housing complaint is received, IFHMB educates the complainant of their rights and responsibilities under the state and federal fair housing laws. Further investigation may then be conducted depending on the nature of the complaint and the suitability of the complaint to investigation.

IFHMB 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, IFHMB will either investigate the complaint or advise the complainant of their other options, which include: conciliation, filing a complaint with the Department of Housing and Urban Development (HUD) or with California’s Department of Fair Employment and Housing (DFEH), hiring a private attorney, or possibly, a referral to such an attorney, or filing a complaint with the

Department of Justice (DOJ)).

During the period studied, there were 29 discrimination inquiries made to IFHMB by Rancho Cucamonga residents. **Table V-1** shows the basis of IFHMB discrimination complaints.

Table V-1
Fair Housing Discrimination Complaints by Basis: 2017-2018

Basis	Number of Inquiries	Number of City Residents Affected
Disability	18	42
National Origin	1	4
Race	0	0
Arbitrary Factor	1	7
Age	3	7
Familial Status	1	5
Religion	2	2
Sex	3	5
Total:	29	72

Source: Inland Fair Housing and Mediation Board, 2019.

Review of the data shows that disability is, far and away, the most common category for allegations of discrimination. Disability represents 62 percent of all discrimination complaints. Age and sex (10 percent each) are the second most common basis for alleged discrimination, with religion at 6 percent of all discrimination complaints coming from the City of Rancho Cucamonga.

The Office of Fair Housing and Employment (OFHE) is the federal agency responsible for investigating housing discrimination complaints filed with HUD. HUD annually compiles data on housing discrimination complaints from OFHE and Federal Housing Assistance Programs (FHAP) which are state and local government agencies that enforce fair housing laws. The annual report identifies the types of complaints, any fair housing impediments, OFHE's progress in addressing the complaints, and HUD's efforts to promote equal housing choice.

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

The following table (**Table V-2**) illustrates the breadth of HUD and FHAP discrimination complaints from FY 2014-2017.

Table V-2
HUD and FHAP Discrimination Complaints, 2017

	FY 2017		FY 2016		FY 2015		FY 2014	
	No.	%	No.	%	No.	%	No.	%
Disability	4,865	59.4%	4,908	58.5%	4,605	55.8%	4,621	54.4%
Race	2,132	26.0%	2,154	25.7%	2,291	27.8%	2,383	28.1%
Familial Status	871	10.6%	882	10.5%	1,031	12.5%	1,051	12.4%
National Origin	826	10.1%	917	10.9%	898	10.9%	1,067	12.6%
Sex	800	9.8%	800	9.5%	915	11.1%	879	10.4%
Religion	232	2.8%	204	2.4%	225	2.7%	223	2.6%
Color	192	2.3%	143	1.7%	151	1.8%	146	1.7%
Retaliation	834	10.2%	785	9.4%	832	10.1%	867	10.2%
Number Filed:	8,186		8,385		8,246		8,489	

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

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

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

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

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

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

Table V-3
FY 2014 - 2017 Issues in HUD & FHAP Complaints

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

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

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

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

Table V-4
FY 2010 - 2013 Issues in HUD & FHAP Complaints

Complaint Issue	FY 2010		FY 2011		FY 2012		FY 2013	
	No.	%	No.	%	No.	%	No.	%
Refusal to Sell	205	2%	142	2%	190	2%	170	2%
Refusal to Rent	2,405	24%	2,239	24%	2,317	26%	2,273	27%
Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property	5,959	59%	5,674	61%	5,516	63%	5,713	68%
Discriminatory Notices, Statements or Advertisements	937	9%	784	8%	936	11%	986	12%
False Denial or Representation of Availability	256	3%	250	3%	237	3%	246	3%
Failure to Permit a Reasonable Modification	203	2%	207	2%	204	2%	194	2%
Failure to Make a Reasonable Accommodation	2,556	25%	2,408	26%	2,487	28%	2,543	30%
Non-Compliance with Design and Construction Requirements	169	2%	90	1%	106	1%	114	1%
Discriminatory Financing	511	5%	442	5%	383	4%	433	5%
Steering	84	1%	62	1%	81	1%	80	1%
Redlining	6	<0.5%	2	<0.5%	11	<0.5%	5	<0.5%
Refusal to Provide Insurance	2	<0.5%	0	0%	4	<0.5%	6	<0.5%
Coercion, Intimidation, Threats, Interference, and Retaliation	1,478	15%	1,650	18%	1,913	22%	1,884	23%
Number of Complaints Filed	10,155		9,354		8,818		8,368	

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

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

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

Review of **Tables V-3 and V-4** can reveal trends in housing as they combine eight years of HUD data. First, the total number of complaints made to HUD and state fair housing agencies, such as DFEH, fell from 10,155 total complaints in Fiscal Year 2010 to 8,186 total complaints in Fiscal Year 2017, representing a 19 percent decrease. However, those decreases in discrimination complaints were not evenly dispersed amongst all categories over that eight year period. In fact, discrimination allegations based on a failure to make a reasonable accommodation to policies, rules or procedures rose by 76 percent over that period. The percentage of complaints based on a failure to make a reasonable accommodation as a percentage of the total number of complaints filed rose from 25 percent of all complaints filed in FY2010 to 41.1 percent of all complaints filed in FY2017.

Hate Crimes

Hate crimes are violent acts against people, property, or organizations because of the group to which they belong or identify with. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate, or act violently toward a person who has exercised their right to free housing choice. Some examples include threats made in person, writing or by telephone, vandalism of the home or property, or unsuccessful attempts at any of these.

Again, a comparison between **Tables V-3 and V-4** reveal some interesting information about possible hate crimes related to housing. Beginning in FY2010, the total number of complaints made to HUD and state agencies based on coercion, intimidation, threats, interference, or retaliation totaled 1,478 before peaking at 1,913 complaints in FY2012 and did not return to pre-2010 levels until 2016. While the data does not indicate the reason for this spike in complaints based on coercion, intimidation, threats, interference, and retaliation, the data does suggest that discrimination most closely associated with hate crimes may be on the rise in housing discrimination, as this category of complaint still represents 17.8 percent of all complaints filed for FY 2017.

The HUD and FHAP findings do not appear to be reflected in the City of Rancho Cucamonga 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, gender, or disability.

Table V-5 summarizes the hate crime incidents by bias motivation as reported by the FBI¹ for calendar years 2015-2018. It is important to note that not all incidents of coercion, intimidation, threats, interference, or retaliation rise to the level of a hate crime, and even with those incidents that do, not all such incidents are reported to law enforcement. However, given the data reported on the number and types of discrimination complaints made in the City of Rancho Cucamonga, it is safe to assume, based on the data available at this time, that hate crimes are not occurring and going unreported in the City of Rancho Cucamonga, which, correspondingly, does not indicate an impediment to fair housing.

¹ FBI Hate Crime Incidents by State and Agency, 2012-2018. <http://www.fbi.gov/ucr>

Table V-5
Hate Crime Incidents 2015-2018

Calendar Year	Race/ Ethnicity/ Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2015	4	0	0	0	0	0	4
2016	4	0	0	0	0	0	4
2017	0	0	0	0	0	0	0
2018	2	0	0	0	0	0	2
Total:	10	0	0	0	0	0	10

Source: FBI Hate Crime Incidents by State and Agency, 2015-2018. <http://www.fbi.gov/ucr/>

C. Fair Housing Legal Status

No cases were disclosed by IFHMB that were filed in a court of competent jurisdiction by the IFHMB to enforce fair housing laws. IFHMB was successful in conciliating or otherwise addressing the fair housing cases that were investigated on behalf of Rancho Cucamonga residents during this time period.

VI. Conclusions and Recommendations

Previous chapters of this A.I. study examined changes in Rancho Cucamonga during the last five years, analyzed public policies for impediments to fair housing, and documented fair housing opportunity in Rancho Cucamonga. Building upon the previous analysis, this chapter recommends actions to improve housing opportunity in Rancho Cucamonga. **Table VI-1** at the end of this chapter summarizes the recommendations to address the identified impediments to fair housing choice, including an implementation schedule.

A. Impediments and Recommendations

HUD requires the A.I. to include any identified impediments and provide recommendations to address each impediment. For the 2020-2024 planning period, there is one (1) impediment to fair housing choice, summarized below.

Discrimination Against Persons with Disabilities

According to data from the City's contracted fair housing service provider covering the most recent fiscal year, the number of fair housing discrimination complaints on the basis of disability accounted for 62 percent of all complaints. The next two closest discrimination complaint types include age and sex, each accounting for 10 percent of all complaints. Throughout the region, the state, and nationally, disability-related complaints are the leading basis of discrimination cited by residents, accounting for approximately two-thirds of all complaints in some jurisdictions, demonstrating a lack of understanding and sensitivity of the fair housing rights of persons with disabilities, who experience difficulties when requesting reasonable accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

Recommendation: The City of Rancho Cucamonga and its contracted fair housing service provider should facilitate educational opportunities for property owners, property managers, and residents in Rancho Cucamonga to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications. This initiative may be fulfilled through workshops, public service announcements, literature distribution and the provision of landlord-tenant mediation services.

B. Fair Housing Plan

The recommendations included in **Table VI-1** on the following page outline the City's action plan to eliminate the three impediments to fair housing choice identified above. The recommendations include a designated agency or agencies that should be involved in the implementation of each recommendation, as well as a target date for completion or implementation.

Table VI-1
Fair Housing Plan Recommendations

Impediment	Recommendations	Lead Agency	Timeframe
1. Discrimination Against Persons with Disabilities	The City of Rancho Cucamonga and its contracted fair housing service provider should facilitate educational opportunities for property owners, property managers, and residents in Rancho Cucamonga to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications. This initiative may be fulfilled through workshops, public service announcements, literature distribution and the provision of landlord-tenant mediation services.	Contracted Fair Housing Service Provider	July 2020 – June 2025

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Signature Page

I, John Gillison, City Manager of the City of Rancho Cucamonga, 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.

John Gillison
City Manager

Date
