

## C.1. Overview of AB 686

In 2018, the California State Legislature passed AB 686 to expand upon the fair housing requirements and protections outlined in the Fair Employment and Housing Act (FEHA). The law:

- requires all state and local public agencies to facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation to foster more inclusive communities; and
- creates new requirements that apply to all housing elements due for revision on or after January 1, 2021.

The passage of AB 686 protects the requirement to affirmatively further fair housing within California state law, regardless of future federal actions. It also preserves the strong policy in the U.S. Department of Housing and Community Development's (HUD) Affirmatively Furthering Fair Housing (AFFH) Rule as published in the Federal Register in 2015.

As of January 1, 2019, AB 686 proactively applies the obligation to affirmatively further fair housing to all public agencies in California. Public agencies must now examine existing and future policies, plans, programs, rules, practices, and related activities and make proactive changes to promote more inclusive communities.

AB 686 also creates new requirements for all housing elements due to be revised on or after January 1, 2021. These requirements ensure that the obligation to affirmatively further fair housing is a part of a jurisdiction's planning process and guiding documents for community development.

## C.2. Assessment of Fair Housing Issues

A fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty and affluence, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.

This assessment of fair housing considers the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. The California Department of Housing and Community Development (HCD) has developed a statewide AFFH Data Viewer. The AFFH Data Viewer assembles various data sources and provides options for addressing each of the components within the full scope of the assessment of fair housing. The AFFH Data Viewer was utilized to address the data components of new requirements to affirmatively furthering fair housing in combination with other data such as local or regionally available data. Other data sources used in this assessment include the 2010 U.S. Census, American Community Survey (ACS) 5-Year Estimates, and other sources as referenced below. Patterns were compared from the 2019 ACS 5-Year and the 2010 ACS 5-Year Census data to identify trends within the jurisdiction.

### C.2.1. Fair Housing Enforcement and Outreach Capacity

The City of Norco (City) is served by the Fair Housing Council of Riverside County (FHCRC). The FHCRC is a non-profit organization that seeks to protect the housing rights of all individuals. This

organization, approved by HUD, works with government offices to ensure Fair Housing laws are upheld. Since 1986, FHCRC has taken part in a variety of activities to eliminate illegal housing discrimination, such as free educational workshops, outreach to the community, and the investigation of discrimination complaints throughout the county.

FHCRC investigates allegations of discrimination based on a person's status as a member of one of the State or Federally 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. According to FHCRC quarterly reports covering July 1, 2013 through June 30, 2018, 87 percent of fair housing complaints were received by telephone and 13 percent of complaints were received in-person at an office location. Once a Fair Housing complaint is received, FHCRC educates the complainant of their rights and responsibilities. The complainants are advised of possible further investigation depending on the complaint.

During the five-year period studied (July 1, 2013 to June 30, 2018) in the Analysis of Impediments to Fair Housing Choice 2019-2024, FHCRC assisted county residents with fair housing discrimination complaints, addressing 3,108 complaints in total, with 95 percent of those from in-place tenants, 3 percent from landlords or managers and the balance from other types of complainants. Consistent with state and national trends, the leading bases of complaints included physical disability (51 percent), mental disability (12 percent), race (10 percent), familial status (8 percent), national origin (7 percent), and sex (3 percent). Taken together, complaints based on disability status accounted for 63 percent of all cases in Riverside County. None of the complaints received during the 5-year period were from Norco residents.

The 2014 County of Riverside (County) Analysis of Impediments (A.I.) included a recommendation to “[c]ontinue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public regarding housing discrimination, fair housing laws, and services provided by the Fair Housing Council.” The County supported the development and expansion of education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by FHCRC. FHCRC provided 20 first-time homebuyer workshops during fiscal year 2017-18.

In addition, the City regularly updates its municipal and zoning codes in accordance with State and Federal laws and requirements regarding fair housing. With each housing element cycle, local nonprofits, agencies, advocacy groups, and other fair housing stakeholders are invited to take part in the development and review of the City's housing element (see Section C.2.6). To increase enforcement and outreach, the City will provide FHCRC information at City Hall and will provide a link on their website to fair housing services and information.

### **C.2.2. Integration and Segregation**

Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

## *Race and Ethnicity*

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility. In February 2017, HCD and the California Tax Credit Allocation Committee (TCAC) convened a group of independent organizations and research centers that would become the California Fair Housing Task Force (“Task Force”). HCD and TCAC charged the Task Force with creating an opportunity map to identify areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table C-1 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- Poverty: Tracts with at least 30 percent of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

According to the California Fair Housing Task Force’s 2021 TCAC/ HCD opportunity maps, the city of Norco is made up of census tracts identified as Highest Resource and High Resource, as shown in Figure C-1. Nearby areas that are designated as High Segregation & Poverty include central portions of the city of Riverside to the east and Corona to the south (see Figure C-2). Within the County of Riverside, the eastern portion of the county is shown as generally having lower resources than western jurisdictions. High resource areas are clustered around the Norco/Corona, Indio/La Quinta, and Temecula regions. Areas of Low Resource and High Segregation & Poverty are found around the outskirts of urban areas, within the more rural regions of the county.

**Table C-1: Domains and List of Indicators for Opportunity Maps**

Domain Indicator	Indicator
Economic	Poverty
	Adult education
	Employment
	Job proximity
	Median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency
	Reading proficiency
	High school graduation rates
	Student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020

Figure C-1: 2020 TCAC/HCD Opportunity Areas (Norco)

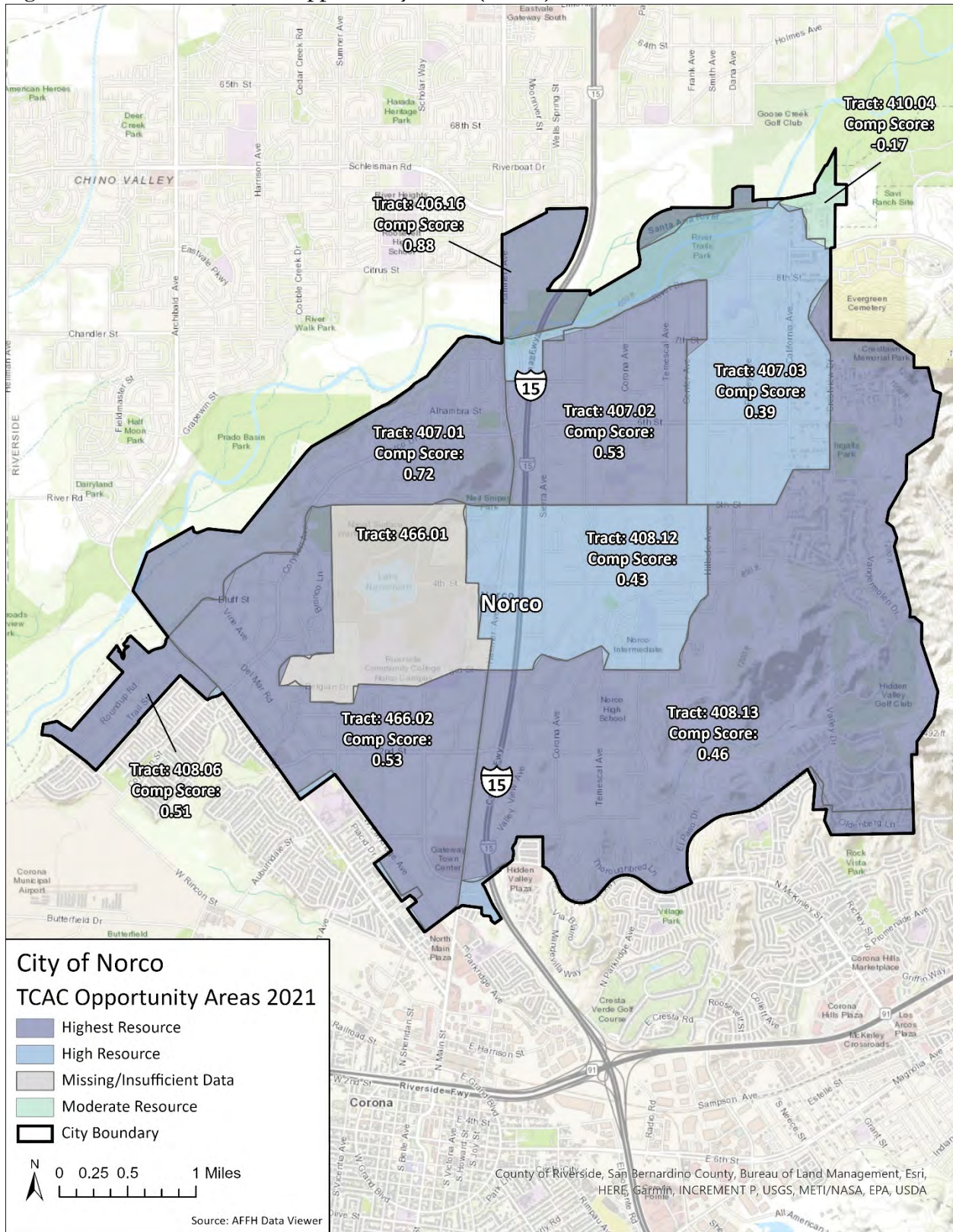




Figure C-2: 2021 HCD/TCAC Opportunity Areas (County)

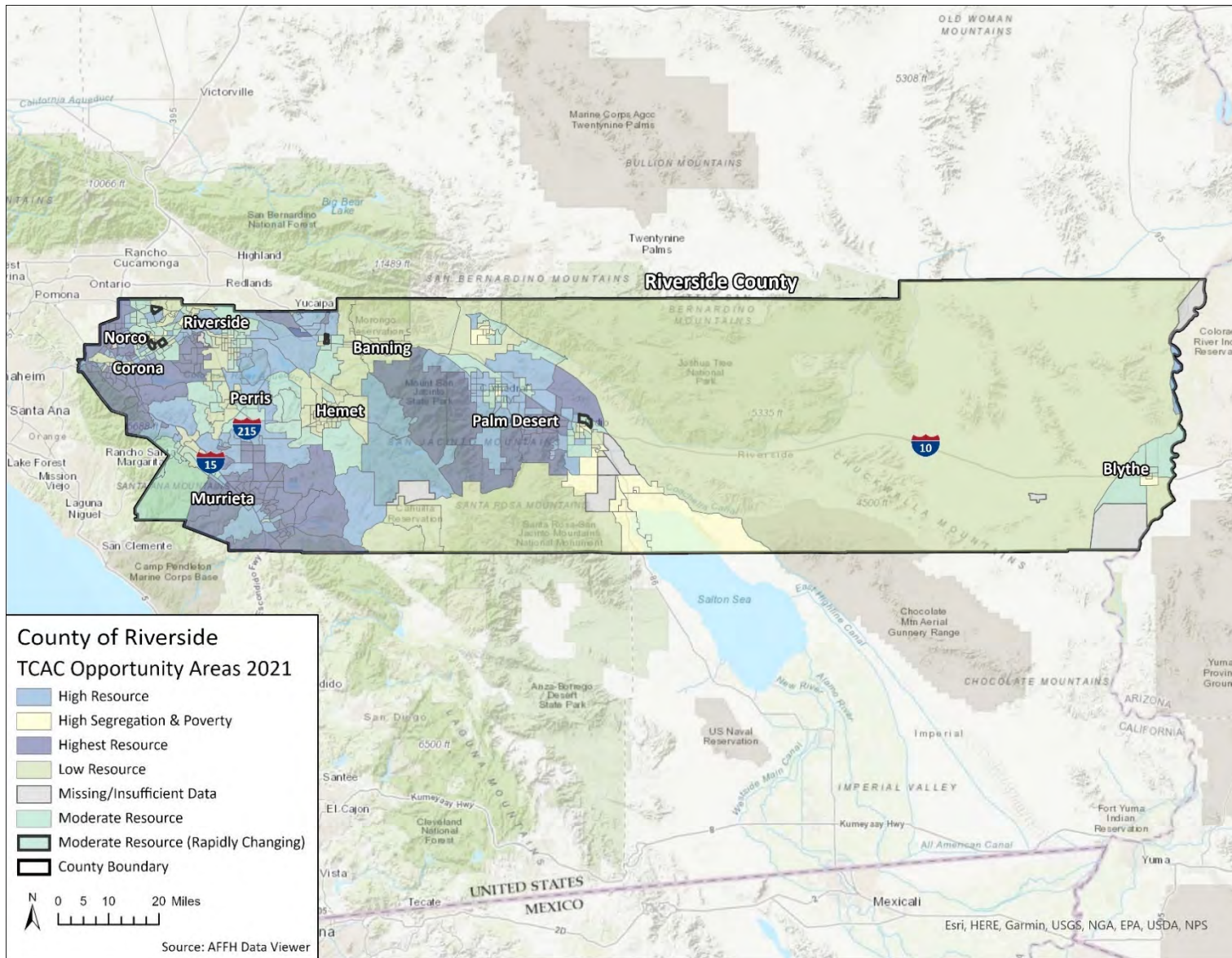
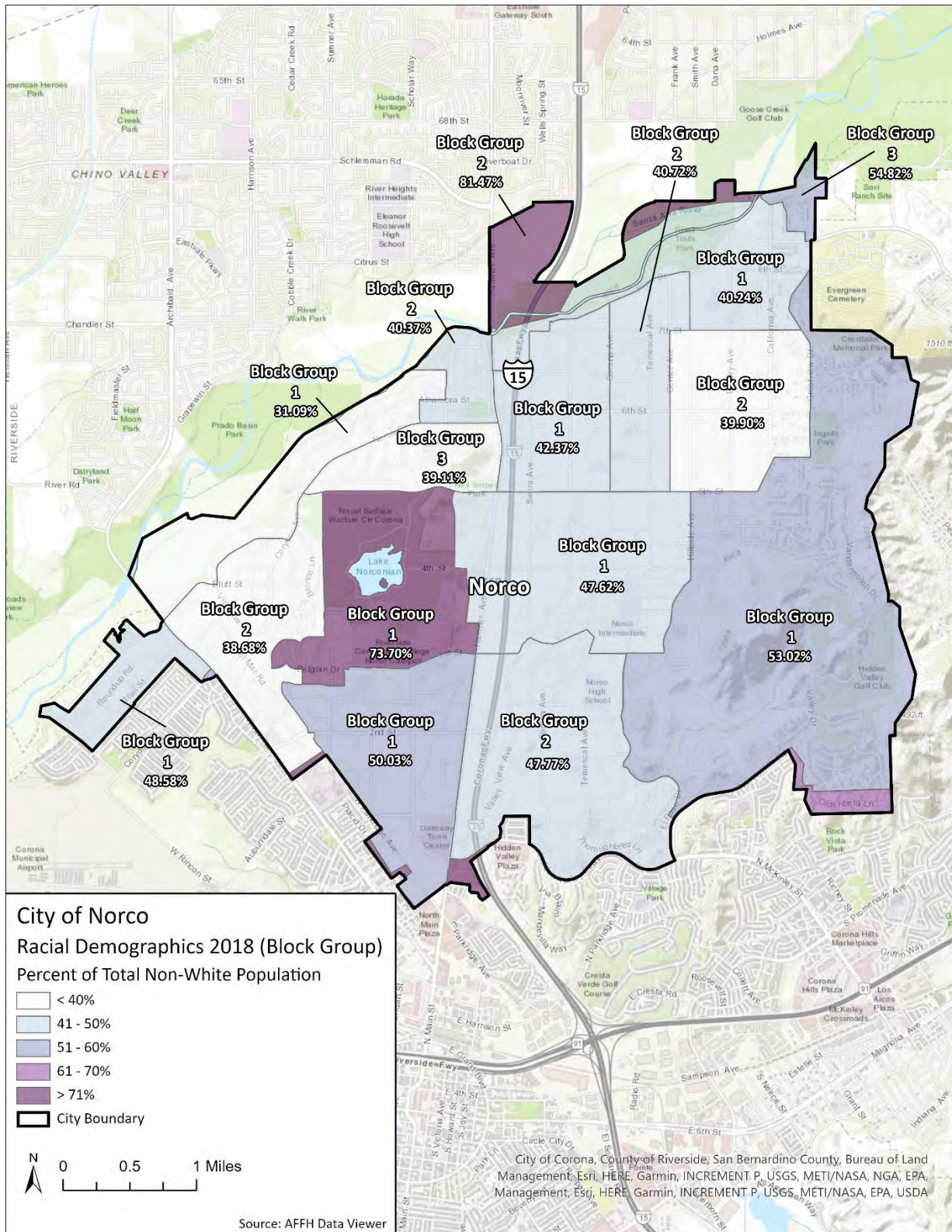




Figure C-3: Areas of Minority Concentration in Norco



Census block groups with the highest concentration of minority races, in this case, a Hispanic majority, are located west of Interstate 15 and the northern boundary of the city that borders Jurupa Valley. These block groups consist of a minority concentration of 73.70 percent and 81.47 percent respectively (Figure C-3). While these block groups have a high percentage of minorities, most of the census block groups in the city have a low percentage ranging from 30 to 48 percent. In contrast, a majority of census blocks in Riverside County have a high concentration of minority groups, where the minority population is upwards of 90 percent. An important note on mapping of racial/ethnic concentrations is that concentration is defined by the proportion of a racial/ethnic group in the total population of a census block group. If a census block group has a low population, the proportion of a racial/ethnic group may appear high. This could be the case with Norco, as the city has a small population relative to other cities in the county.

### *Persons with Disabilities*

According to the 2019 A.I., nearly 63 percent of the discrimination complaints in the County of Riverside over the last five years were on the basis of physical or mental disability. In total, there were 3,108 fair housing complaints surfaced through the work of the FHCRC over the last five years, with 1,586 or 51.03 percent of all discrimination cases reported on the basis of physical disability and with 370 or 11.90 percent of all discrimination cases reported on the basis of mental disability. These two case categories were the leading causes (first and second, respectively) of discrimination complaints in Riverside County according to FHCRC data.

As shown in Figure C-4, people with disabilities generally compose 10 to 20 percent of the population within Riverside County census tracts. Higher concentrations of persons with disabilities are located in the Hemet, Banning, and Palm Desert areas. Tracts within the city of Norco include populations with less than 10 percent or 10 to 20 percent persons with disabilities (see Figure C-5). Therefore, the city of Norco includes relatively small numbers of persons with disabilities compared to the county.

### *Familial Status*

In order for families to have protected choice they need to access housing options without discrimination. In a 2016 housing discrimination study, researchers found that compared to households without children, households with children were shown slightly fewer units and were commonly told about units that were slightly larger, and as a result, slightly more expensive to rent (California Department of Housing and Community Development, 2021). This differential treatment is considered discrimination and a type of steering, which occurs on a racial basis as well.

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household. The 2019 A.I. compared County of Riverside households by household type for 2000, 2010, and 2016. The analysis found the number of family households married without children, other families, and non-families are generally increasing, while families married with children are generally decreasing. On the contrary, the average household size continued to increase between 2000 and 2016, from 2.98 to 3.26, showing housing is becoming more crowded even though the number of households married with children are declining.

According to the HCD AB686/AFFH data tool maps (see Figure C-6), all census tracts in the city identified persons 18 years and over in households living alone as making up less than 20 percent of the overall population. Conversely, persons 18 years and over in households living with a spouse accounted for 36 to 60 percent of the population (see Figure C-7). Census tracts near the center of the city had a slightly lower percentage of persons 18 years and over in households living with a spouse than the areas further away from the center of the city. These percentages are consistent with the percentage of married persons reported in the 2019 A.I. (24.34% married with children, 29.82% married without children, 54.16% total).

As shown in Figure C-8, all census tracts in the city had greater than 60 percent of married couple households having children. Although the percentage of married persons within the city was consistent with percentages reported by the county in the 2019 A.I. as mentioned above, the percentage of married couples with children in the city is notably higher than rates reported by the county. Less than half of married couples within the county had children (24.34% married with children and 29.82% married without children), while percentages range from 60 to 100% among married couples within the city. In addition to married couples, the percent of children in female-headed households ranged from less than 20 percent to 40 percent as shown in Figure C-9. These households were concentrated toward the center of the city.



Figure C-4: Percent Population with Disabilities in Riverside County

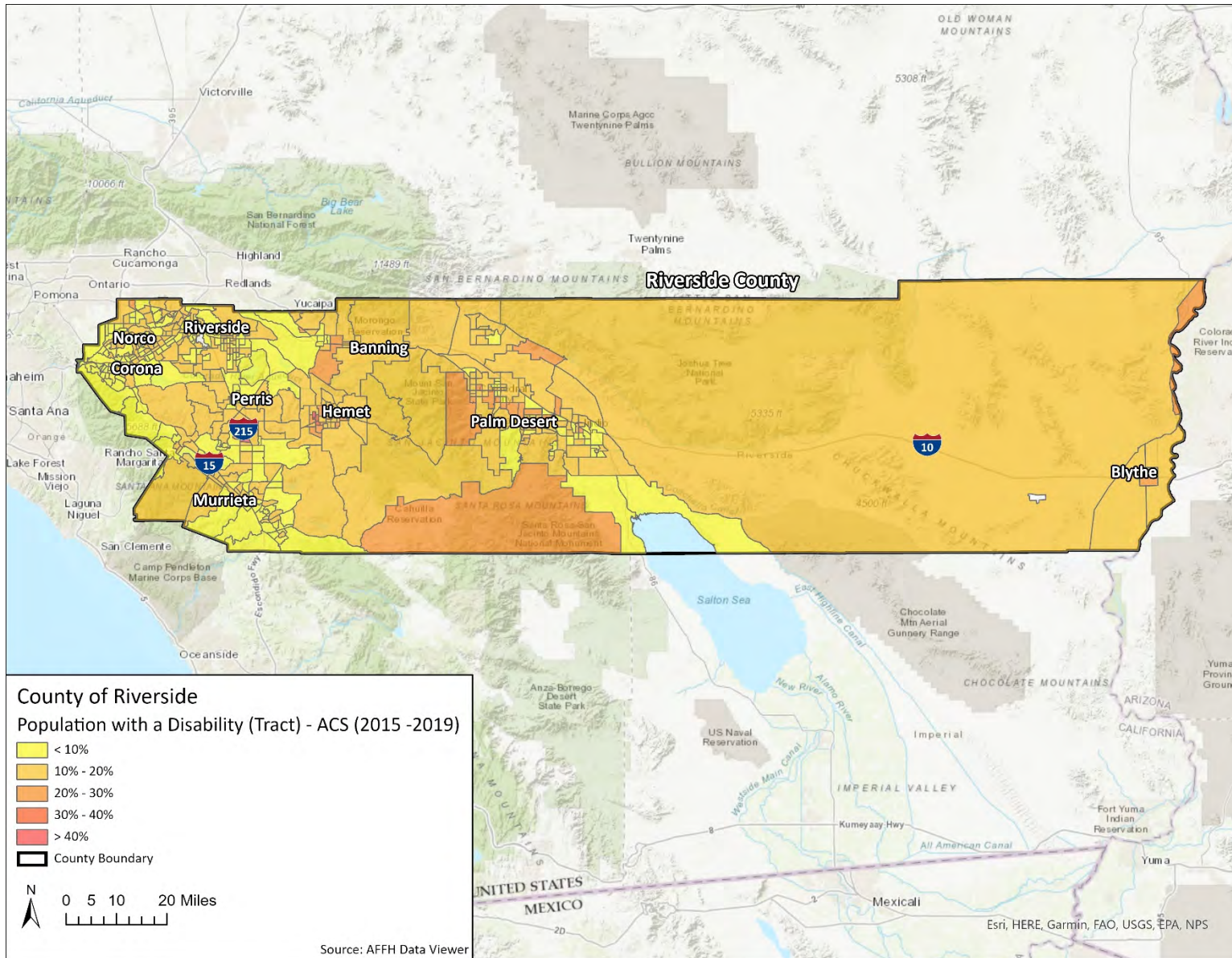




Figure C-5: Percent Population with Disabilities in Norco

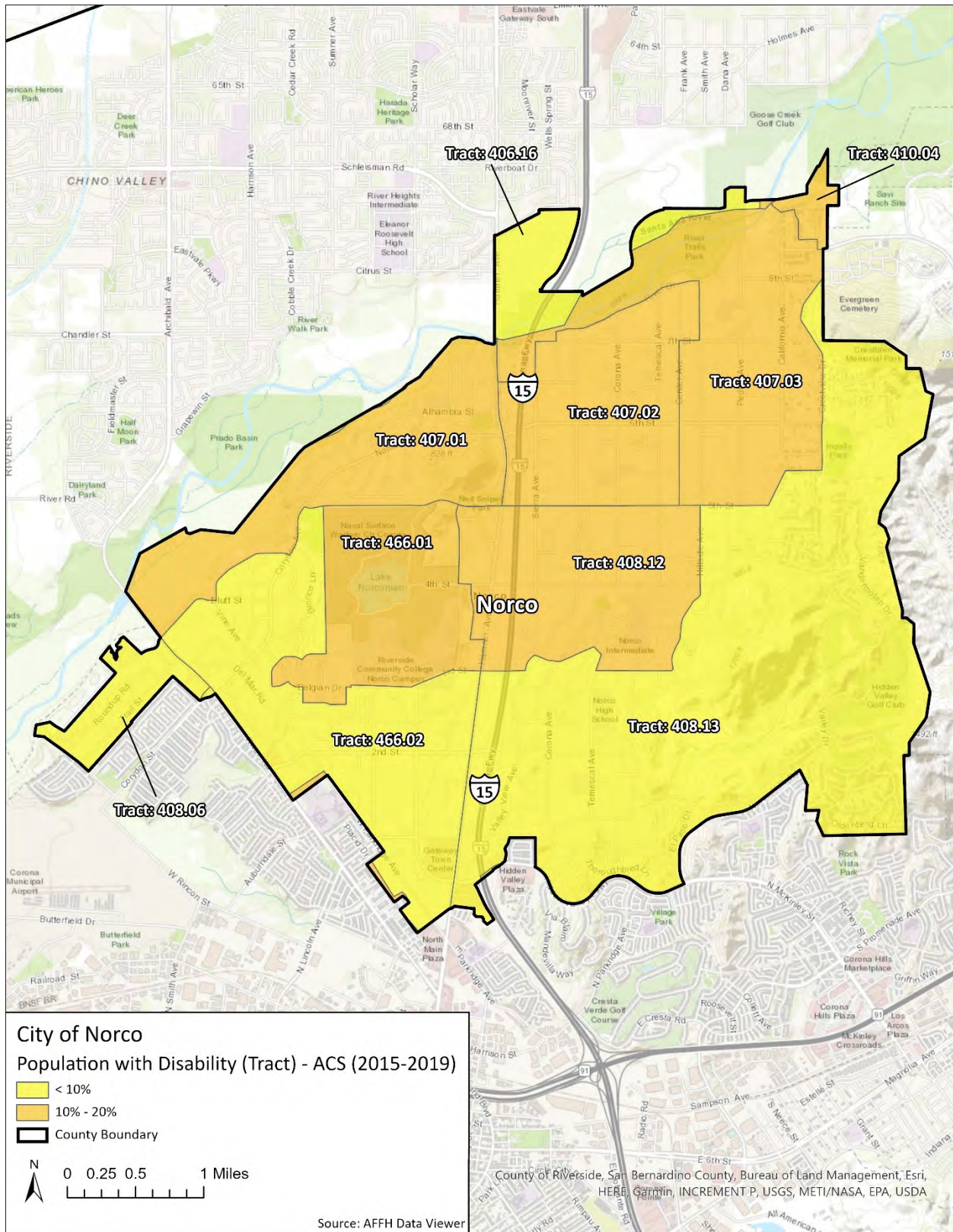




Figure C-6: Percent Population of Adults Living Alone – Norco

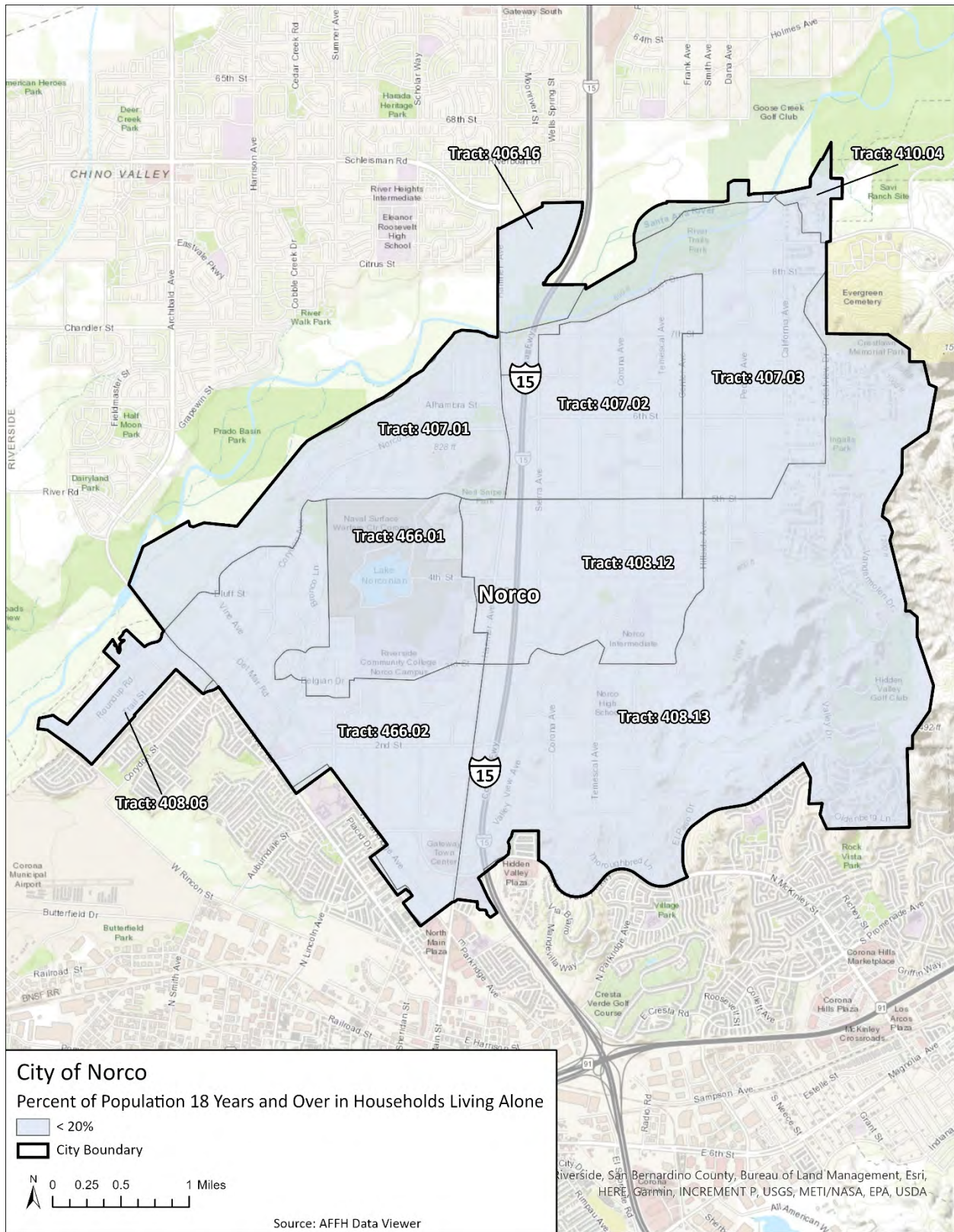




Figure C-7: Percent Population of Adults Living with their Spouse – Norco

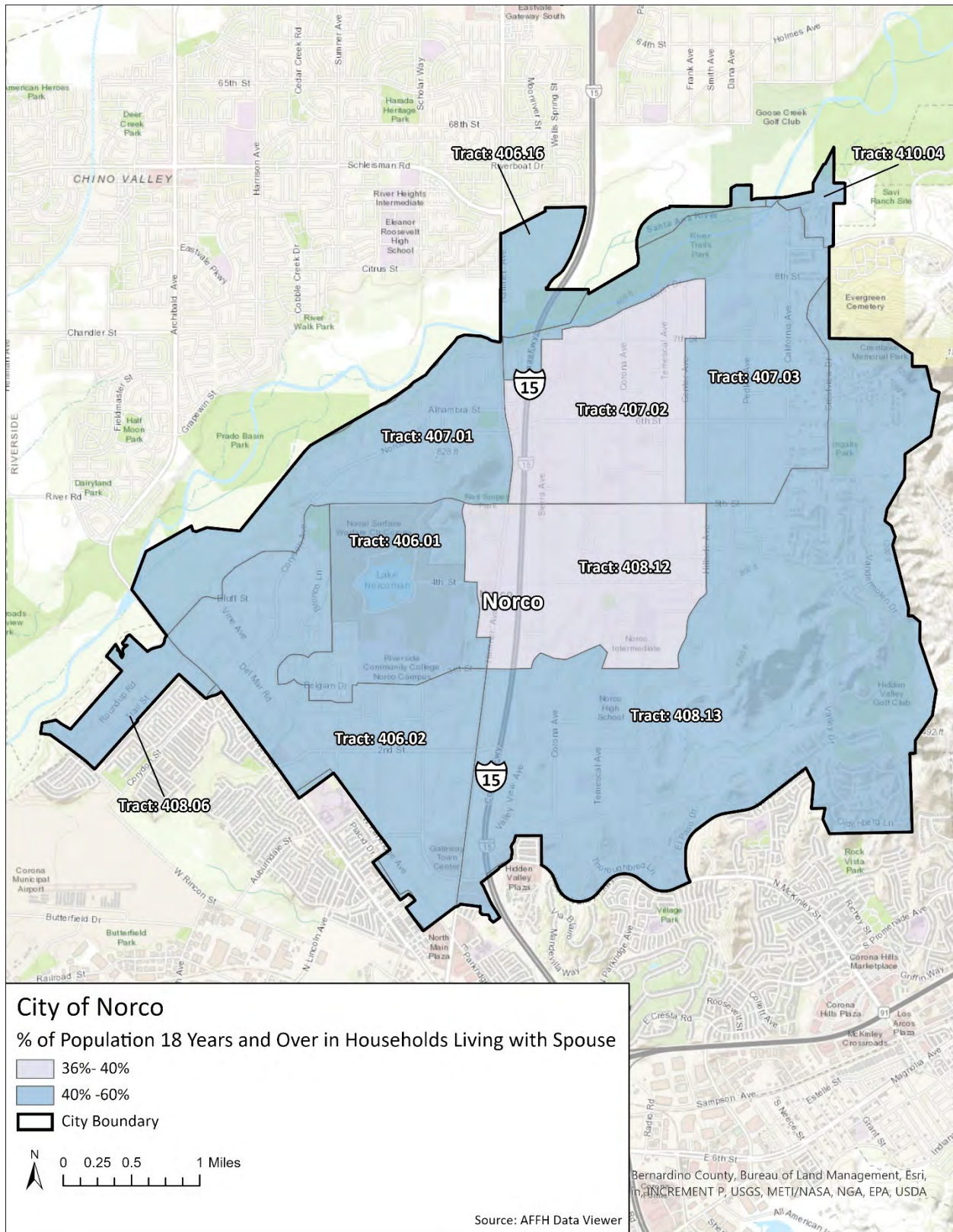




Figure C-8: Percent of Children in Married Couple Households – Norco

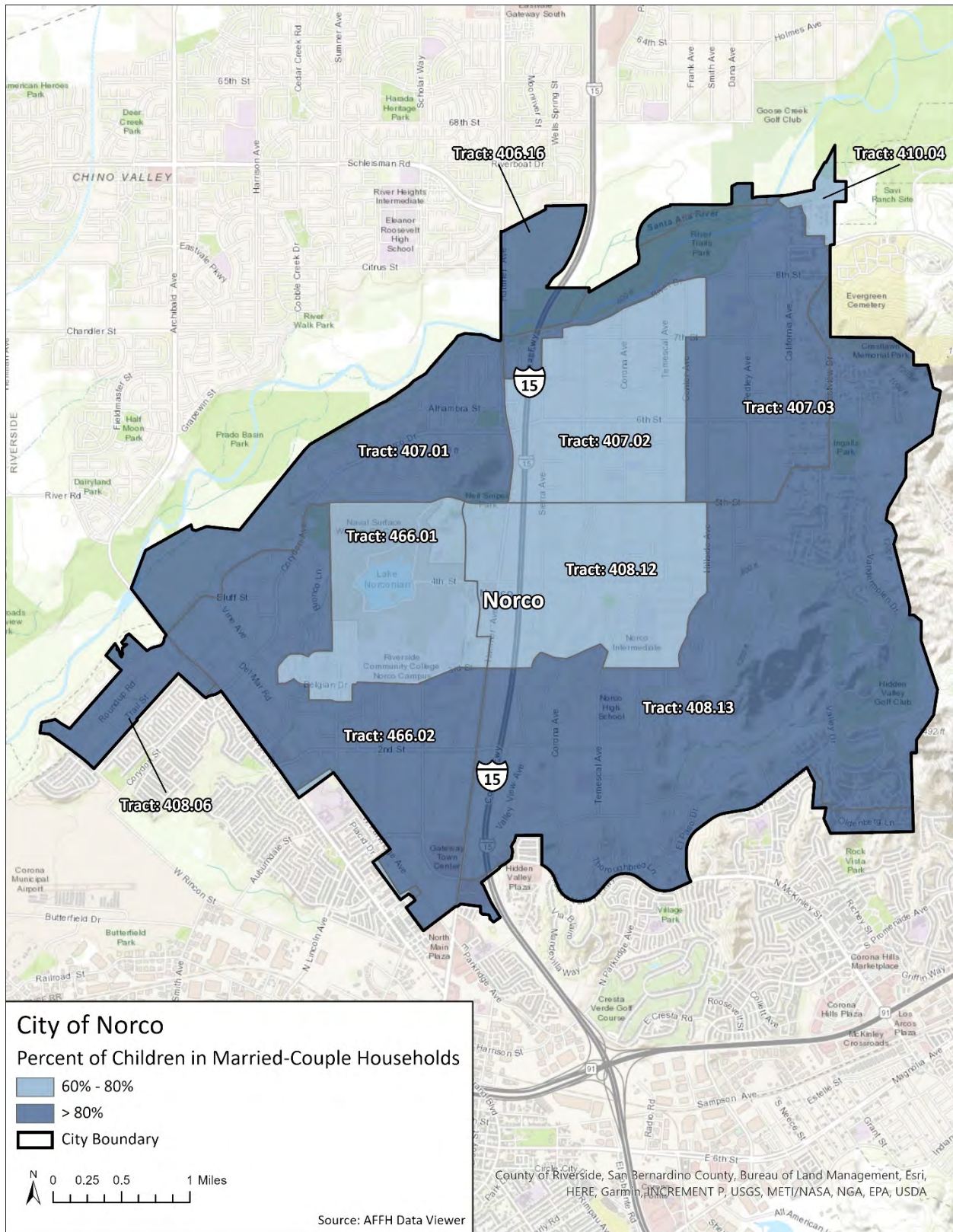
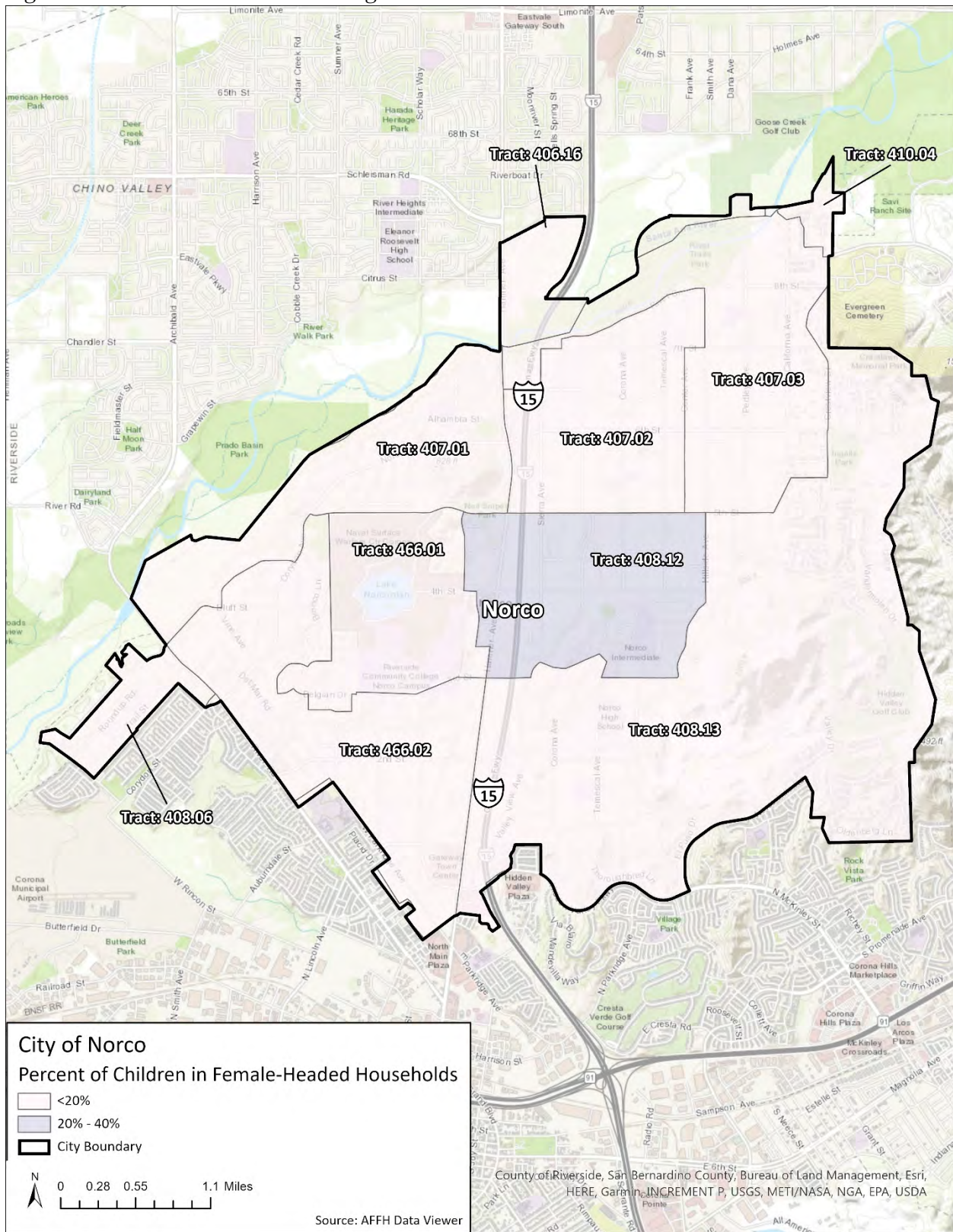




Figure C-9: Percent of Children in Single Female-Headed Households – Norco





## *Income Level*

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figure C-10 shows the Lower and Moderate Income (LMI) areas in the County by census tract. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Similar to trends of high and low resource show in Figure C-2, the western portion of the County of Riverside contains lower proportions of low to moderate income populations while the eastern portion includes higher proportions of low to moderate income populations. There are four clusters of low percentage low to moderate income populations, including western Norco/Corona/Eastvale, northeast Riverside, surrounding Murrieta/Temecula, and the Indio/La Quinta area. The city of Norco does not include any LMI areas (greater than 50 percent low to moderate income), with the exception of census tract 410.04 (Figure C-11). Census tract 410.04 is predominately within the City of Riverside and is reflective of However, the cities of Corona and Riverside contain concentrations of LMI areas, while cities to the west, including Eastvale and Chino Hills, and unincorporated Riverside County to the south do not.

### C.2.3. Racially and Ethnically Concentrated Areas

#### *Racially/Ethnically Concentrated Areas of Poverty*

In an effort to identify racially/ethnically-concentrated areas of poverty (RECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and has a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. The County of Riverside includes several RECAP area clusters scattered throughout the jurisdiction as shown in Figure C-12. RECAP areas include Riverside/Moreno Valley, southwest of Perris, Hemet, Mecca, and Desert Hot Springs. Most of the RECAP areas overlap areas also designated as being higher in percentage of poverty-status households; however, some RECAP areas, such as near Perris and Riverside, contain lower percentages of poverty-status households. The city of Norco is not considered a RECAP area and is identified as having lower percentages of poverty-status households (less than 10 percent to 20 percent).

#### *Racially Concentrated Areas of Affluence*

In response to the RECAPs utilized by HUD in its 2015 AFFH rule, scholars at the University of Minnesota Humphrey School of Public Affairs have created the Racially Concentrated Areas of Affluence (RCAAs) metric to more fully tell the story of segregation in the United States. Based on their research, RCAAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). While this is a useful measure nationwide, HCD has adjusted the RCAA methodology to better reflect California's relative diversity.

Figure C-10: Low and Moderate Income (LMI) areas in Riverside County

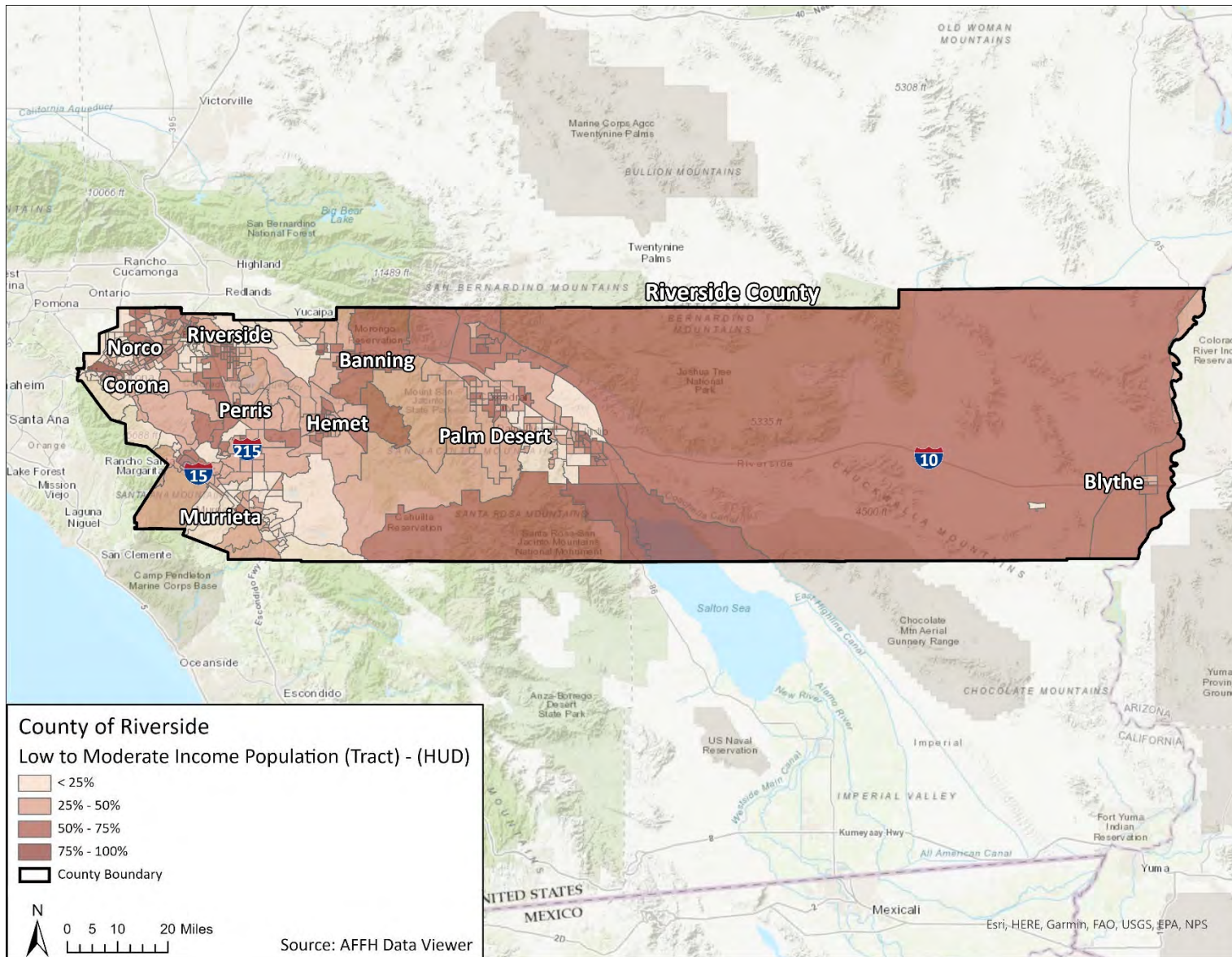




Figure C-II: Low and Moderate Income (LMI) areas in Norco

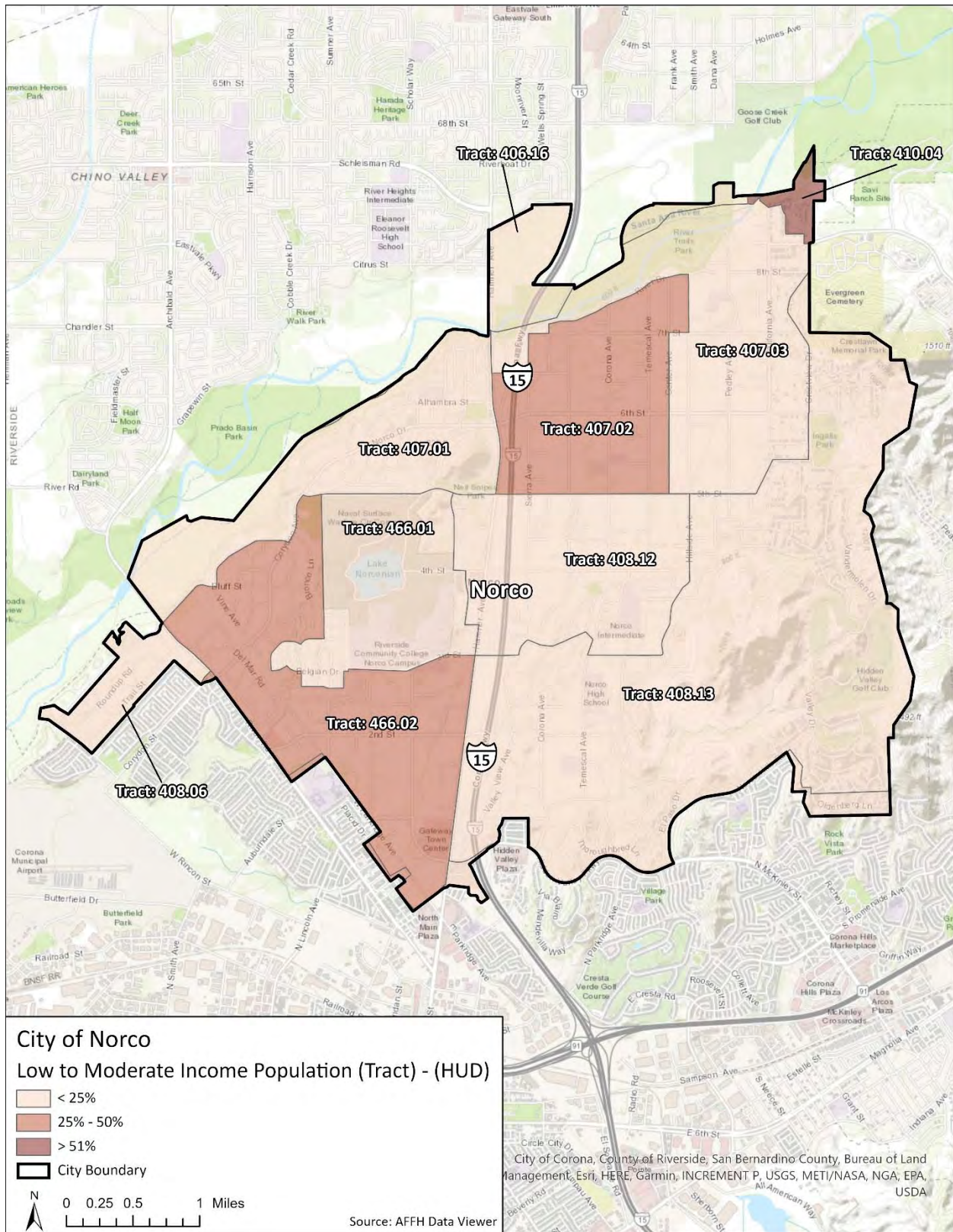
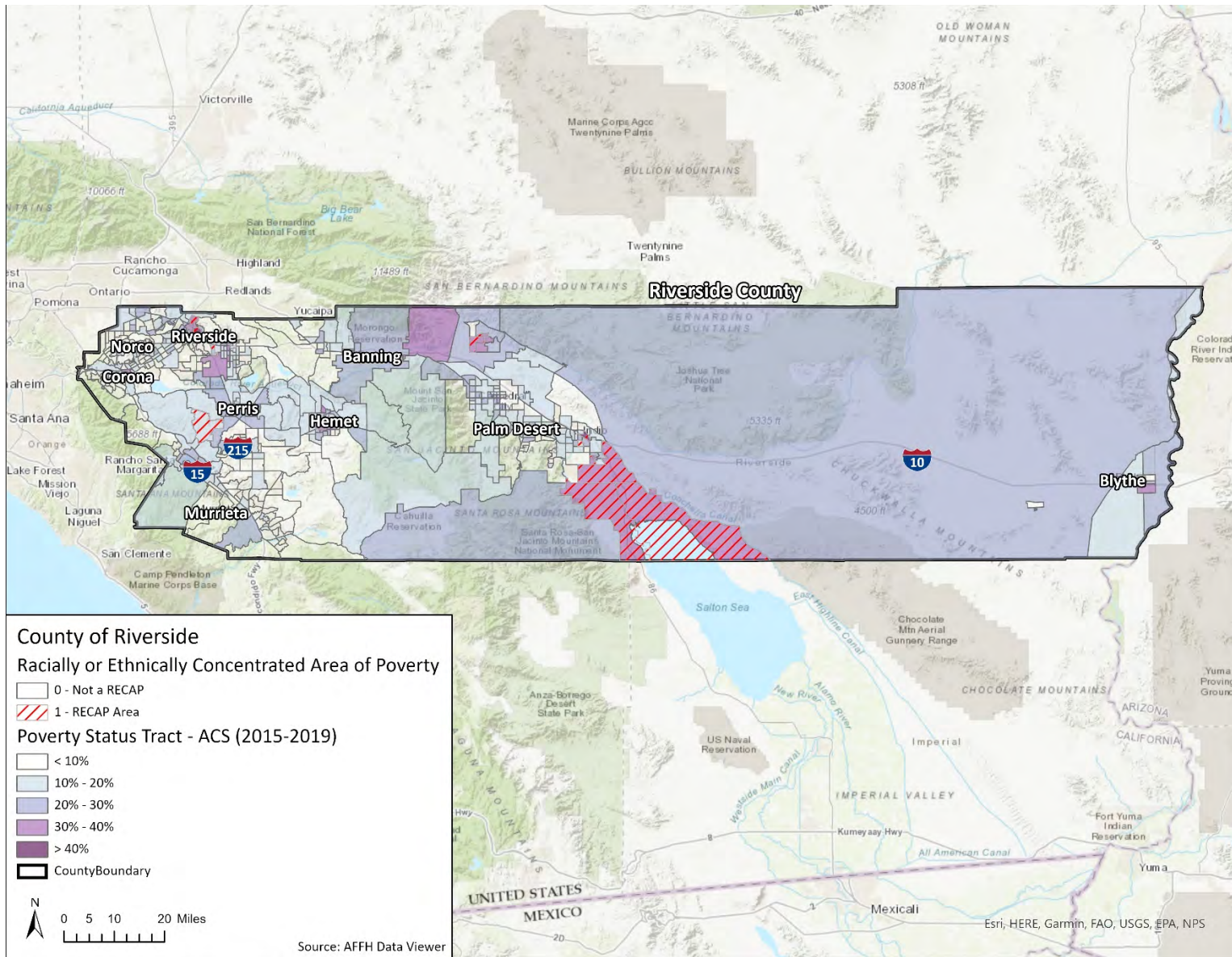




Figure C-12: Racially Concentrated Areas of Poverty (RECAPs) in Riverside County



RCAAs have not been studied extensively nor has a standard definition been published by HCD or HUD, this fair housing assessment uses the percent White population and median household income as proxies to identify potential areas of affluence. Figure C-13 shows the disparity between white population and minority populations. Census block groups within the city of Norco are identified as having a sizable (10 to 50 percent gap) White population majority. Median income within the city ranges from less than \$30,000 to greater than \$125,000, as shown in Figure C-13. Census block groups with the highest median incomes in the city are located to the far west and east (block group 1, census tract 408.13; block group 1, census tract 407.01; and block group 2, census tract 466.02). Overlapping areas of sizable White population majority and high median income are located in the far east and west portions of the city indicating possible racially concentrated areas of affluence.

According to ACS 5-Year 2014-2019 data, the city median income was \$102,817 and the County was \$73,260. Additionally, the 59.8 percent of the city population and 59.8 percent the county population identified as White (alone). The city of Norco has a substantially higher median income than Riverside County, but overall percentage of the White population is almost identical. However, as shown in Figure C-10 and described above, there are four clusters within the county of low poverty and higher affluence, including western Norco/Corona/Eastvale, northeast Riverside, surrounding Murrieta/Temecula, and the eastern Palm Desert area. Map II-3: Demographics and Poverty of the 2019 A.I. illustrates relatively high concentrations of White population overlapping these same areas, indicating possible racially concentrated areas of affluence.

#### C.2.4. Access to Opportunities

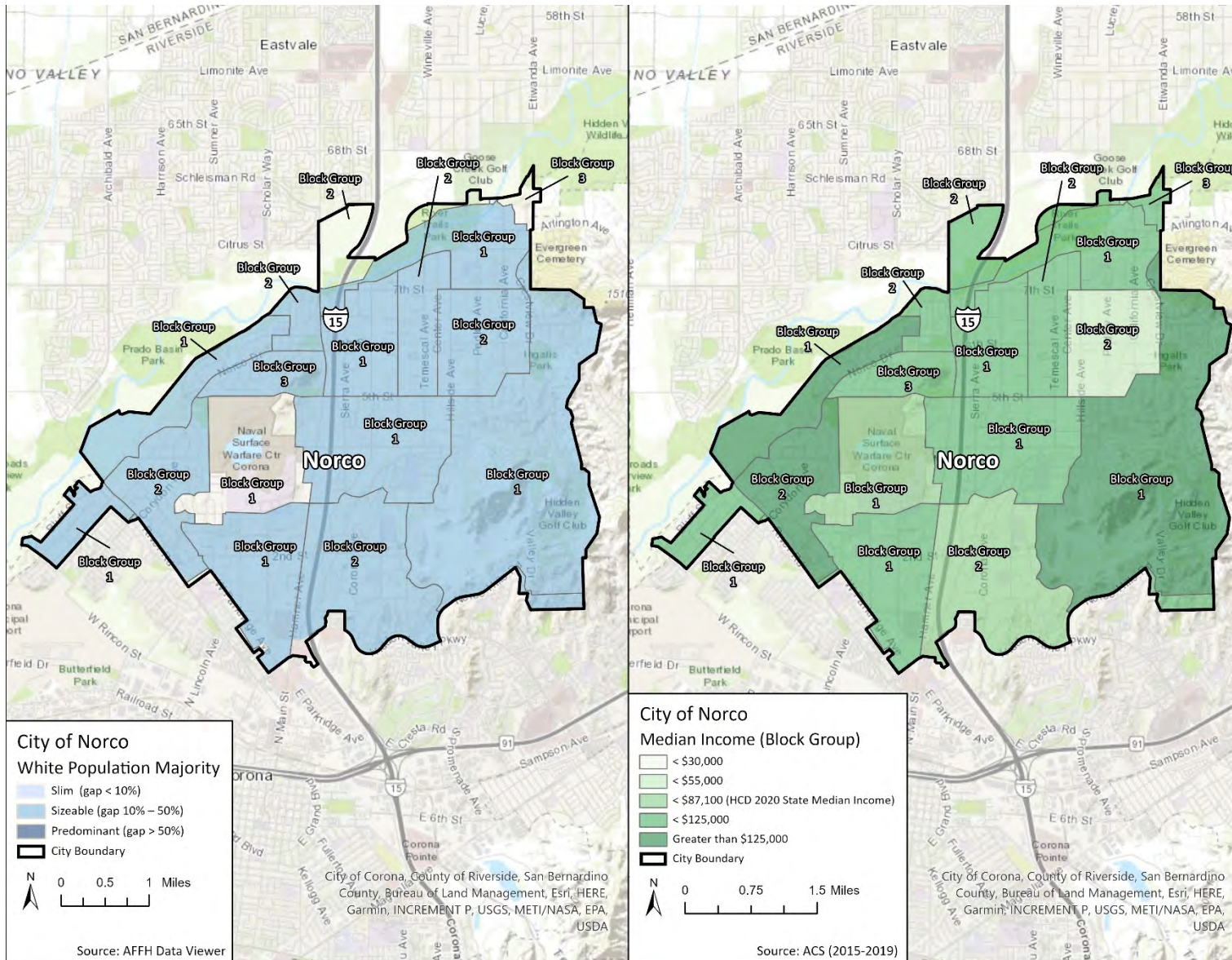
Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to “High Resource” neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).

##### *TCAC/HCD Opportunity Maps*

The 2021 TCAC/HCD Opportunity Maps are made from composite index scores of three different divisions (economic, environmental, and education) to categorize tracts as low, moderate, or high resource (Table C-1 shows the full list of indicators). Categorization is based on percentile rankings for census tracts within Riverside County. Higher composite scores mean higher resources. At the county level, high and highest resource areas are located in the eastern and central areas of the county. Most tracts surrounding the city of Norco are of high or highest resource. From Indio to Blythe, the vast majority of eastern Riverside County is mostly of low resource. Locally, northern and central census tracts (407.03 and 408.12) scored lower, indicating lower resources than other tracts within the city, although overall scores still indicated High Resource. Table C-2 shows the scores by domain.



Figure C-13: White Population and Median Income Distribution





**Table C-2: Opportunity Map Scores and Categorization (2021)**

Census Tract	Economic Domain Scores	Environmental Domain Scores	Education Domain Score	Composite Index Score	Final Category
466.01	N/A	N/A	N/A	N/A	N/A
466.02	0.853	0.136	0.904	0.533	Highest Resource
407.01	0.906	0.2	0.949	0.725	Highest Resource
407.02	0.881	0.193	0.84	0.534	Highest Resource
407.03	0.802	0.302	0.795	0.388	High Resource
408.06	0.863	0.265	0.827	0.514	Highest Resource
408.12	0.717	0.201	0.879	0.435	High Resource
408.13	0.868	0.089	0.854	0.459	Highest Resource

Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2021 Statewide Summary Table, December 2020

### *Education*

The County of Riverside includes 23 school districts and 558 schools. The number of Title I schools in the county is 48, approximately 8.6 percent of total schools within the county. According to the AFFH Data Viewer, education domain scores within the county were consistent with the opportunity composite index scores. The areas that had the greatest education domain scores were in areas such as western Norco/Corona/Eastvale, northeast Riverside, surrounding Murrieta/Temecula, and the eastern Palm Desert area. Areas that were identified as having lower education domain scores included tracts in more rural areas and of higher poverty status (see Section C.2.1), such as Banning, Hemet, and Mecca.

According to the AFFH Data Viewer, all census tracts within the city were identified as greater than 0.75 education domain score (more positive education outcomes), except for census tract 466.01, which was categorized as less than 0.25 education domain score (less positive education outcomes). This census tract includes the California Rehabilitation Center, a correctional facility, which may include populations of persons with low education opportunity and achievement. According to the 2015-2019 American Community Survey 5-Year Estimate, Norco has a high percentage of Title I schools (27.7 percent) compared to the county overall (8.6 percent) as seen in Table C-3. Title I schools are intended to help meet the educational needs of students by using federal, state, and local funds to support effective, evidence-based educational strategies that close the achievement gap and enable the students to meet the state’s challenging academic standards. Schools in which children from low-income families make up at least 40 percent of enrollment are eligible to use Title I funds to operate schoolwide programs that serve all children in the school in order to raise the achievement of the lowest-achieving students. Kidsdata.org, a program of the Lucile Packard Foundation for Children’s Health, estimated that 19.6 percent of children aged 0-17 in the Corona-Norco District were living in low-income working families between 2012 and 2016. In the city of Norco, Title I schools are concentrated in tracts 407.03, 410.04, and 466.02, which consists of a population with higher percentages of lower to moderate income households and a total non-White population when compared to the rest of the city. The Early Care and Education Unit (ECE) has received several grants to help meet their goals for improving childcare and building capacity in Riverside County.

These grants allow ECE to assist the community in receiving child development funding; work with teachers and childcare providers in promoting early literacy and reading readiness; assist parents with skills for raising their children; and increase quality child development programs.

### *Employment*

Local economic characteristics impact local housing needs, even though these characteristics may not be directly related to fair housing. These economic characteristics include the types of jobs available within the municipality, the way residents access jobs, the types of occupations held by residents, and their household income. HUD states, “The job proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Central Business Service Area (CBSA), with larger employment centers weighted more heavily.” The 2019 A.I. identified the County of Riverside’s top 10 employers as primarily in the Medical, Education, and Municipal sectors. While one major retail company, Amazon, remains among the top ten County employers, it is surpassed by the U.S. Military, a major university, and a regional government bureaucracy in terms of numbers of employees. The 2019 A.I. provided Jobs Proximity Index rankings for various groups, broken down by ethnicity and with separate statistics for residents below the poverty level. The scores for the jurisdiction are fairly consistent, even when compared to scores for residents below the federal poverty line. In fact, the highest score in the jurisdiction is among Native Americans below the poverty line, at 52.34. The lowest score is assigned to Blacks in poverty, at 46.08. The other four ethnic groups scored higher among their populations in poverty than among their general populations: Whites, at 51.17, Hispanics at 49.17, and Asians and Pacific Islanders at 49.34. These relatively high Jobs Proximity Index scores for populations in poverty indicate a co-location of job centers and high poverty neighborhoods.

According to the ACS 5-year Estimate, the most common employment sectors for those who live in Norco, are construction, retail trade, and health care and social assistance. This breakdown is of primary residents of Norco, though some of these residents may live within the city and work elsewhere. In 2018, the areas with the highest median household income in Norco were census tracts 407.01 and, 408.13, which are clustered at the southern border of the city’s boundary. Similar to the distribution of median household income, the highest job proximity rankings in Norco were concentrated in southern Norco. Higher median household income could be correlated to the jobs proximity index rankings as those households have better access to jobs through Interstate 15 and State Route 91. Generally, Norco has higher index scores nearly across the board which indicates greater access for Norco residents to opportunities in the important areas of education and employment and lower exposure to poverty. Furthermore, these scores are consistent across various protected groups, meaning that members of most racial and ethnic groups experience a better standard of living by various measures than their counterparts within the greater statistical region.

### *Transportation*

Riverside residents in urban and suburban areas generally enjoy superior access to transportation infrastructure, which includes the RTA bus system, the Sun Line Transit Agency in the Palm Springs area, Palo Verde Transit Agency in the Blythe area, the Riverside Metrolink Station, with links to San Bernardino County’s Omnitrans system as well as to Amtrak, the Corona Transit Center, and the West Corona Metrolink Station. The County is home to at least four municipal airports, (Banning Muni Airport, Corona Muni Airport AJO, Palm Springs International Airport, Riverside Muni Airport), five County-owned and operated airports (Chiriaco Summit, French Valley, Hemet Ryan, Jacqueline Cochran, and Blythe), and enjoys proximity to Ontario International Airport. The County is also traversed by numerous major freeways within its boundaries (Interstates 10, 15, 215, and State Routes 60, 91, 71, 74, 79, 86, and 111).



Table C-3 identifies access to opportunity indicators by race and ethnicity. According to All Transit, the County of Riverside scored a 3.3 out of 10 for their overall transit performance score. The performance score takes into considerations such as transit trips per week within 0.25 mile, transit routes within 0.5 mile, jobs accessible within a 30-minute trip time, and number of commuters that use transit.

All Norco residents generally enjoy superior access to transportation infrastructure, which includes the Riverside Transit Agency (RTA) bus system, the Riverside Metrolink Station, and the Corona Transit Center and Metrolink station. The city is also traversed by the Interstate 15 and in close proximity to State Route 91. Each of the public transit operators mentioned have programs available to incentivize ridership of students, seniors, and persons with disabilities. Each has an ADA plan and each of the bus lines offer a version of dial-a-ride that provides origin-to-destination advanced reservation transportation services for seniors and persons with disabilities. According to All Transit, the City of Norco had an overall transit performance score of 1.6. This score is roughly half of the County's performance score. Transit opportunities are low within the city due to the rural nature of the area. Census tracts that had the highest transit scores were 466.01 and 408.12. Both tracts are within the center of the city, adjacent to I-15 and bus stops at 5<sup>th</sup> and Hamner. According to the 2019 5-Year ACS, approximately 47.4 percent of residents experience a work commute time of less than 30 minutes.

### *Environmental*

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). This tool uses census tracts as the unit of analysis where high-scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, considering their socioeconomic characteristics and underlying health status.

Pollution Burden scores for each census tract are derived from the average percentiles of the seven Exposures Indicators (ozone and PM<sub>2.5</sub> concentrations, diesel PM emissions, drinking water contaminants, pesticide use, toxic releases from facilities, and traffic density) and the five Environmental Effects indicators (cleanup sites, impaired water bodies, groundwater threats, hazardous waste facilities and generators, and solid waste sites and facilities). Indicators from the Environmental Effects component were given half the weight of the indicators from the Exposures component. The calculated average pollution burden score (average of the indicators) was divided by 10 and rounded to one decimal place for a Pollution Burden score ranging from 0.1 -10.

Population Characteristics scores for each census tract are derived from the average percentiles for the three Sensitive Populations indicators (asthma, cardiovascular disease, and low birth weight) and the five Socioeconomic Factors indicators (educational attainment, housing burdened low income households, linguistic isolation, poverty, and unemployment). The calculated average percentile is divided by 10 for a Population Characteristic score ranging from 0.1 -10.

After the components are scored within Pollution Burden or Population Characteristics, the scores are multiplied to calculate the overall CalEnviroScreen Score ranging from 1-100%. CalEnviroScreen reports scores as percentiles to compare tracts across the entire county.

Tracts in the city of Norco had relatively low scores with most tracts ranging in between the 30-50 percentile, with the outlier being tract 410.04 that scored 90.20%. This tract also experiences a greater percentage of low to moderate income households and a predominant population of Hispanics. Census tract 410.04 scored high due to high exposures to ozone, particulate matter 2.5, toxic releases, traffic, pesticides, and contaminated drinking water. Census tract 410.04 overlaps several jurisdictions, with most

of its area overlapping the City of Riverside. Figure C-14 and Table C-3 shows that while Norco had relatively low scores, overall Riverside County averaged high scores with most tracts scoring over 50.01%.

Neighboring cities like Riverside (average: 71-95 percentile) and Jurupa Valley (average: 65-91 percentile) had some of the highest scores in the county. Norco's relatively low scores can be correlated to the policies and practices the City has adopted to reduce the environmental footprint of the community. For example, the Norco Municipal Code encourages the use of xeriscape landscaping on all new development to reduce the overall amount of water that is ultimately directed toward the watering of landscaping. In addition, the City's Conservation Element combined the goals of the Western Riverside Council of Government's Climate Action Plan with goals of the Southern California Association of Government's Sustainable Community Strategy which has the same overriding goal of reducing greenhouse gas emissions, but with the focus on coordinated transpiration and land use planning.

### C.2.5. Disproportionate Housing Needs

Disproportionate Housing Needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

There are four housing problems in the (Comprehensive Housing Affordability Strategy) CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any 1 or more of these 4 problems.

As shown in Table C-4, a higher percent of non-White households experienced housing problems than White households in Norco. Non-White households that experienced the greatest proportion of housing problems include American Indian (100 percent), Hispanic (46.73 percent), and Asian or Pacific Islander (46.15 percent); however, all non-White households had a higher percentage of housing problems than White households in Norco.

City data is consistent with findings for Riverside County. A higher percent of non-White households experienced housing problems than White households in Riverside County as well. Non-White households that experienced the greatest proportion of housing problems include Hispanic (59.46 percent), Black (58.67 percent), and American Indian (52.07 percent); however, all non-White households had a higher percentage of housing problems than White households in the county. Aside from American Indian households, all other city populations experienced a lower percentage of housing problems than their respective populations within the county, including White households. Approximately 37.16 percent of overall households in the city identified one or more housing problems, whereas 49.38 percent of overall households in the county identified one or more housing problems. Of note, American Indians residents in Norco identified as 100 percent of households with housing problems; however, the number of American Indian households in the city is extremely low.



**Table C-3: Access to Opportunity Indicators by Race/Ethnicity**

Opportunity Indicators	Census Tracts								City of Norco	County of Riverside
	407.01	407.02	407.03	408.06	408.12	408.13	466.01	466.02		
<b>Poverty Rate</b>										
Population Below Federal Poverty Level	4.1	3.6	7.1	6.2	18.8	6.4	4.3	3.4	7.5	13.7
White alone	4.7	4.0	7.4	6.0	20.0	7.2	4.2	3.7	8.4	12.0
Black or African American alone	0.0	100.0	100.0	0.9	-	7.4	14.3	0.0	8.6	17.5
American Indian and Alaska Native alone	0.0	-	-	8.2	-	0.0	-	0.0	0.0	20.8
Asian alone	0.0	0.0	8.7	8.4	42.9	0.0	0.0	0.0	1.1	11.3
Native Hawaiian and Other Pacific Islander alone	-	-	-	-	-	-	-	-	-	13.0
Hispanic or Latino (of any race)	9.6	1.3	9.4	7.3	28.3	8.4	5.5	3.1	10.8	16.7
<b>School Proficiency</b>										
Total Title 1 Schools	-	-	-	-	-	-	-	-	3	48
Total Schools	-	-	-	-	-	-	-	-	11	558
Percent of Schools	-	-	-	-	-	-	-	-	27.3	8.6
<b>Unemployment Rate (2019)</b>	2.7	3.4	3.4	0.6	3.1	1.6	0.1	2.4	2.1	4.5
<b>Job Proximity</b>										

< 29 mins.	52.4	44	47.2	44.4	41.4	42.9	47.5	49.5	48.8	44.3
30 – 59 mins.	28.6	34.7	28.7	36.1	39	29.4	35.4	22.2	26.4	31.6
60 mins. or more	19.2	21.4	23.9	19.6	19.6	27.8	17.2	28.2	24.8	24.1
<b>Transit Metrics</b>										
All Transit Performance Score	1.9	1.2	0.5	0.0	2.8	1.4	3.1	1.4	1.6	3.3
Transit Trips Per Week within ½ Mile	146	112	97	0	220	141	216	93	138	589
Transit Routes within ½ Mile	1	1	0	0	1	1	1	1	1	3
Jobs Accessible in 30-Min Trip	14,488	12,467	8,473	0	28,001	22,173	28,001	14,321	17,685	27,262
Commuters Who Use Transit (percent)	0.00	0.41	1.06	1.57	1.60	0.38	0.00	2.94	1.11	1.42
<b>CalEnviroScreen</b>										
CES 3.0 Score	26.31	32.06	23.26	16.13	35.23	28.81	-	27.43	18.87	27.93
CES 3.0 Percentile	52.50	63.17	45.73	28.06	68.89	57.43	-	54.69	34.45	50.01
Pollution Burden Score	89	76	65	72	91	97	-	88	4.54	5.17
Population Characteristics Score	28	48	32	14	44	25	-	31	4.20	5.17

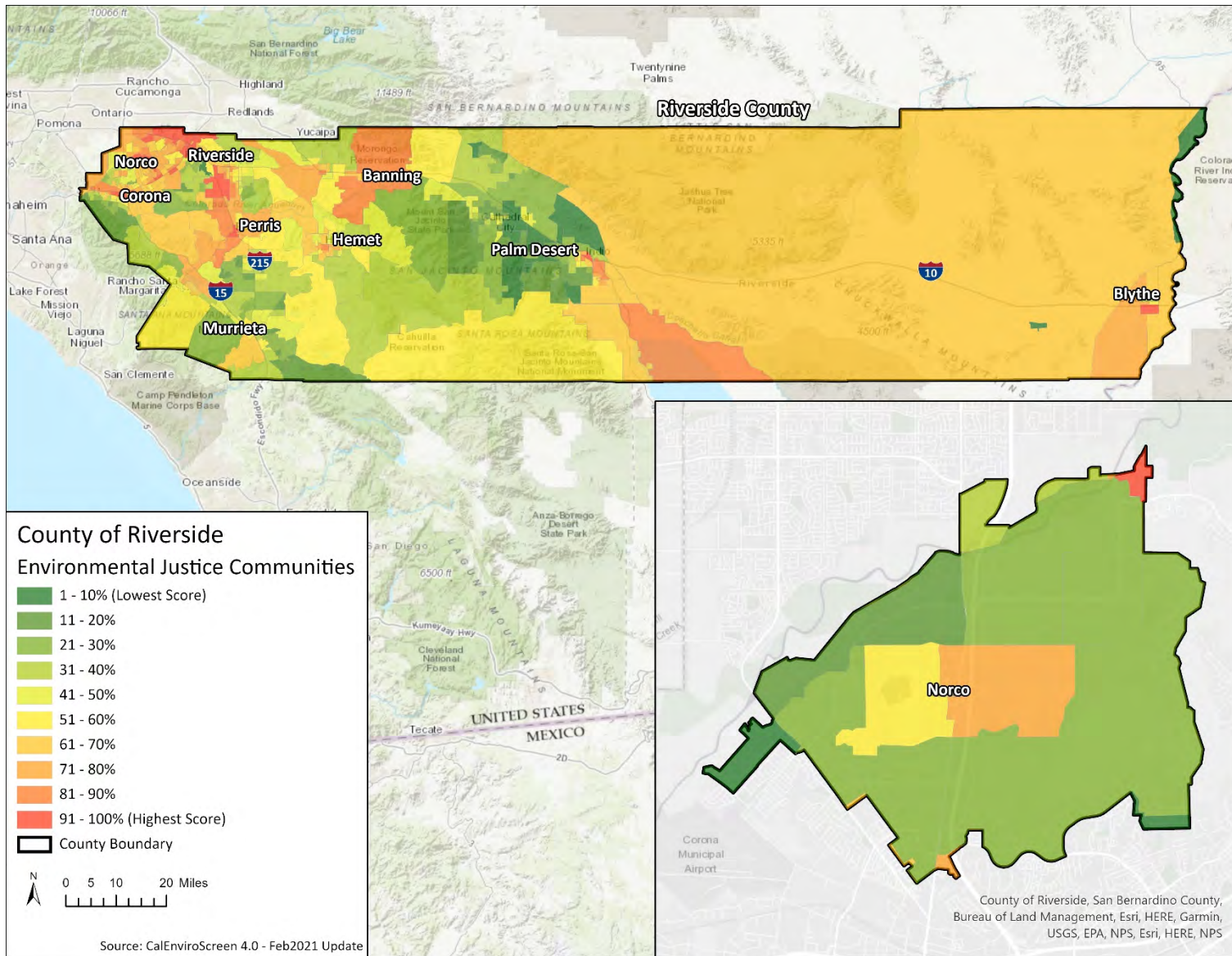
Sources: 2015-2019 American Community Survey 5-Year Estimates; AllTransit Metrics, 2021; CalEnviroScreen 3.0, 2021

Notes: Data regarding census tract 466.01 were not available on CalEnviroScreen.

City and county CalEnviroScreen scores were calculated by taking the average score for all census tracts included within the geographic boundary.



Figure C-14: CalEnviroScreen 3.0 Percentile Scores



**Table C-4: Any Housing Problem by Tenure and Race**

	White	Black	Asian or Pacific Islander	American Indian	Hispanic	Other	All
Norco							
Total households	4,908	74	247	4	1,680	109	7,022
Households with housing problems	1,665	29	114	4	785	44	2,641
Percent of households with housing problems	33.92%	39.19%	46.15%	100.00%	46.73%	40.37%	37.61%
Riverside County							
Total households	355,051	42,287	36,803	3,380	233,476	12,205	683,145
Households with housing problems	149,920	24,810	18,755	1,760	138,825	6,270	337,325
Percent of households with housing problems	42.22%	58.67%	50.96%	52.07%	59.46%	51.37%	49.38%

Sources: HUD CHAS Databook using data from 2013-2017 ACS; County of Riverside Analysis of Impediments to Fair Housing Choice 2019-2024

Large households may also be subject to disproportionate housing problems, whether it is affordability or adequate physical needs (number of rooms, complete facilities). Table C-5 shows that non-family households actually experienced the greatest percentage of housing problems (50.58 percent). The household type with the lowest percentage of housing problems was family households with less than five people (31.66 percent). The percentage of families with more than five people that experienced one or more housing problems (40.08 percent) was almost exactly between the other two household types. According to county data, large families experienced the greatest percentage of households with housing problems (64.48 percent). Non-families experienced the second largest percentage of households with housing problems (50.51 percent) and small families experienced the lowest percentage (43.63 percent) even though the ratio of households of each household type was relatively consistent between city and county populations. Overall, the city had similar or lower percentages of households with housing problems across all household types compared to the county. One explanation could be that the county has a larger percentage of renter-occupied housing than the city, as identified below in Table C-10. Renters may experience more housing problems as a result of slow landlord response, or lack of property investment. According to 2015-2019 ACS 5-Year Estimates, 27.21 percent of 1-person households, 12.33 percent of 2- to 4-person households, and 17.01 percent of 5-person and greater households were renters in the City of Norco. This would be consistent with the trend identified for households with housing problems in the city, indicating a possibility that renters are more likely to experience housing problems than homeowners in the city.



**Table C-5: Housing Problems by Household Type and Size**

Household Type	Family households, <5 people	Family households, 5+ people	Non-family households
Norco			
Total households	4,074	1,260	1,710
Households with housing problems	1,290	505	865
Percent of households with housing problems	31.66%	40.08%	50.58%
Riverside County			
Total households	375,275	129,419	178,440
Households with housing problems	163,745	83,445	90,135
Percent of households with housing problems	43.63%	64.48%	50.51%

Sources: HUD CHAS Databook using data from 2013-2017 ACS; County of Riverside Analysis of Impediments to Fair Housing Choice 2019-2024

### *Cost Burden*

Cost burden is the fraction of a household’s total gross income spent on housing costs. There are two levels of cost burden: (1) “Cost Burden” refers to the number of households for which housing cost burden is greater than 30 percent of their income; and (2) “Severe Cost Burden” refers to the number of households paying 50 percent or more of their income for housing. This analysis must address the burdens on both owners and renters (tenure).

According to HUD CHAS Databook using data from 2013-2017 ACS, the race and ethnicities that experience the greatest severe cost burden in Norco are Other and Hispanic, as shown in Table C-6. The race and ethnicities that experience the greatest severe cost burden in Riverside County are Black and Other. Compared to the county, Norco had lower severe cost burden percentages across all races.

As shown in Table C-7, non-family households experienced the greatest percentage of severe cost burden within Norco and Riverside County. The percentage of non-family households was substantially higher than family households, less than five people and family households, and more than five people; however, the percentage of non-family households with severe cost burden (27.95) was similar to the county’s percentage of non-family households with severe cost burden (27.00). A nonfamily household consists of a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related. As identified above, the 2019 A.I. compared County of Riverside households by household type for 2000, 2010, and 2016. The analysis found the number of family households married without children, other families, and non-families are generally increasing, while families married with children are generally decreasing. This could indicate that there is a lack of housing affordable for non-families and single persons that do not rely on two incomes for living expenses.

**Table C-6: Severe Cost Burden by Race**

	White	Black	Asian or Pacific Islander	American Indian	Hispanic	Other	All
Norco							
Total households	4,908	74	247	4	1,680	109	7,022
Households with severe cost burden	730	0	30	0	365	24	1149
Percent of households with severe cost burden	14.87%	0.00%	12.15%	0.00%	21.73%	22.02%	16.36%
Riverside County							
Total households	355,051	42,287	36,803	3,380	233,476	12,205	683,145
Households with severe cost burden	65,420	12,500	8,370	755	55,930	3,160	146,135
Percent of households with severe cost burden	18.43%	29.56%	22.74%	22.34%	23.96%	25.89%	21.39%

Sources: HUD CHAS Databook using data from 2013-2017 ACS; County of Riverside Analysis of Impediments to Fair Housing Choice 2019-2024

**Table C-7: Cost Burden for Households by Type**

	Family households, <5 people	Family households, 5+ people	Non-family households
Norco			
Total households	4,074	1,260	1,710
Households with severe cost burden	539	133	478
Percent of households with severe cost burden	13.23%	10.56%	27.95%
Riverside County			
Total households	375,275	129,419	178,440
Households with severe cost burden	73,835	24,125	48,185

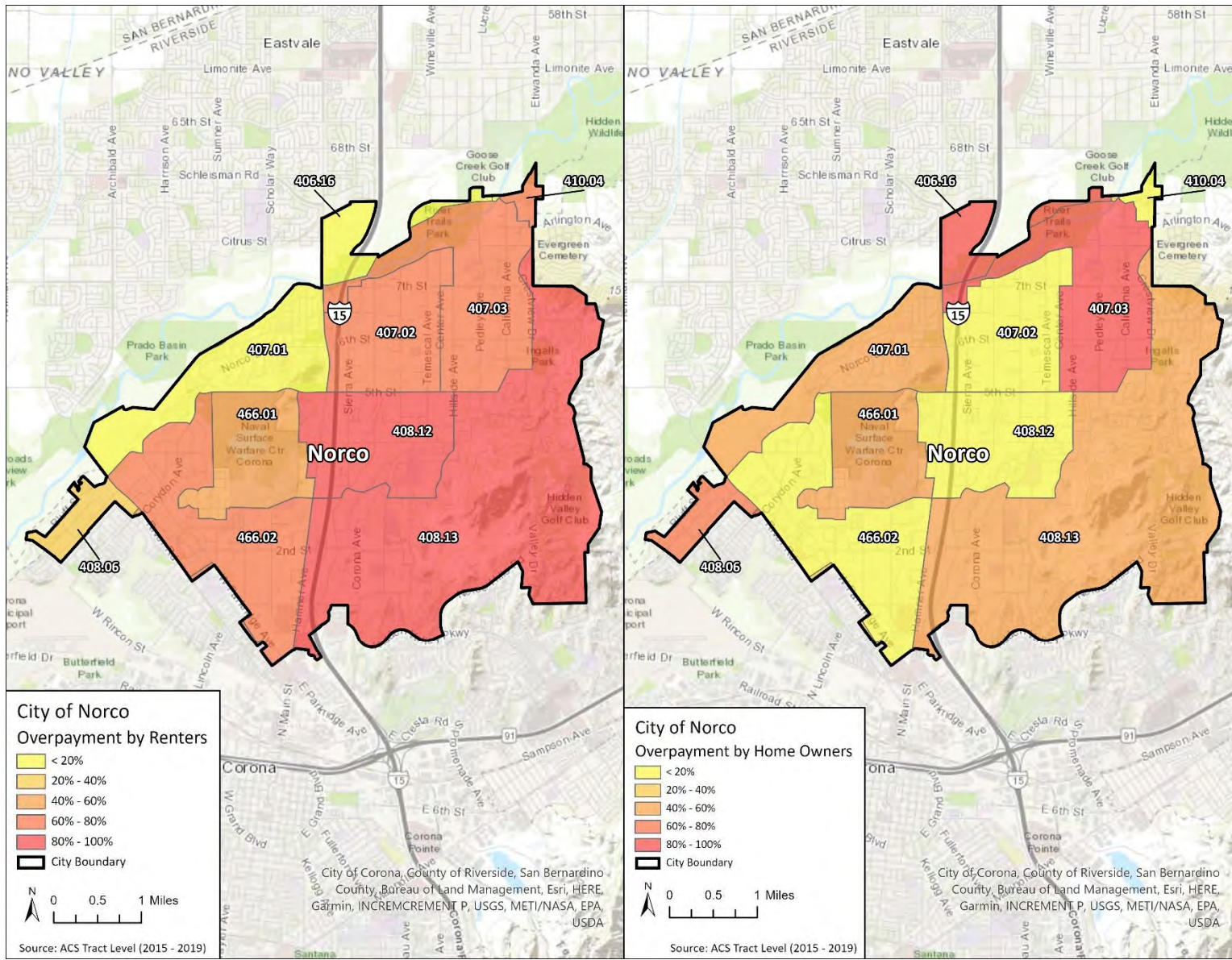


Percent of households with severe cost burden	19.67%	18.64%	27.00%
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Sources: HUD CHAS Databook using data from 2013-2017 ACS; County of Riverside Analysis of Impediments to Fair Housing Choice 2019-2024

Affordability could be a barrier to housing for persons with disabilities or special needs populations who rely on Supplemental Security Income as their primary source of income, which ranges from \$954 to \$1,776, depending on their qualifications. Households may experience cost burden when SSI incomes are not adequate to pay for rent and not increasing at rates comparable to rent increases. Majority of renters within city census tracts had over 40 percent cost burdened households, while majority of homeowners within city census tracts had less than 40 percent cost burden (see Figure C-15). Due to lack of rental options available in the city, renters could experience lack of affordable options.

Figure C-15: Distribution of Cost Burdened/Overpayment Households



## *Overcrowding*

Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms. This analysis of Norco addresses the overcrowding on both owners and renters.

According to the 2018 five-year ACS estimates, a low percentage of households in Norco (average: 1.5 percent) are living in overcrowded conditions. Regionally, census tracts with overcrowded households are concentrated in the west Riverside County, particularly in the cities of Riverside and Jurupa Valley. Meanwhile, within Norco, all tracts besides one have a low percentage of overcrowding ranging between 1 and 3 percent. The tract with the highest percentage of overcrowded living conditions is tract 410.04 (11.01 percent) which is located in the northeastern part of the city that borders Jurupa Valley (see Figure C-16). The low average of overcrowded living condition in Norco suggests that there are no significant disparities in the proportion of members of a protected class, as populations of all races and income levels do not experience overcrowding within the city.

## *Substandard Housing*

Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Within the housing industry, as a general rule, homes older than 30 years begin to require major investments to maintain quality. Necessary improvements include siding, painting, and roofing, among others.

According to the 2019 A.I., as of 2017, 32.3 percent of County housing was at least 38 years old. A similar percentage of units within Norco are of similar condition, as only 36 percent of housing is older than 50 years old in all tracts of the city (Table C-8). According to HUD CHAS Databook using data from 2013-2017 ACS, approximately 317,235 had at least one of the four housing problems recognized by HUD, indicating potential substandard conditions. Housing problems considered by HUD is inclusive of cost burden, and therefore, the number of units indicated reflects both physical and financial housing problems. However, financial burden could be considered an indicator for potential substandard living conditions, since the 2019 A.I. identified that low-income families are often the most impacted by substandard living conditions.

Within the city, old housing units are concentrated in census tracts 466.02, 408.12, and 408.13 in the south-center of the city. Most new housing has been built in the last 30 years in tract 407.03, which is located at the city's eastern boundary. The primary contributor for development within the eastern portion of the City the past three decades is the availability of vacant land large enough to facilitate the approval of residential tract maps. In other parts, such as the south, the land is more build out and has limited room for new housing tracts except for some infill opportunities. Based on Code Enforcement, Building Department, and Planning Department knowledge of the community, fewer than one percent of homes (approximately 75 units) are substandard, and a further 2 percent (approximately 150 units) have unpermitted construction which may be substandard, yielding a total of 225 units of substandard housing. This is supported by SCAG data, which show 0.14 percent of Norco residences lack plumbing facilities and 0.24 percent lack complete kitchen facilities (Pre-certified Local Housing Data for the City of Norco, August 2020). Housing with substandard conditions could be the result of several causes, including unpermitted construction. The enforcement of existing property maintenance codes is a primary means to preserve housing and the quality of neighborhoods. The Code Enforcement Division is responsible for



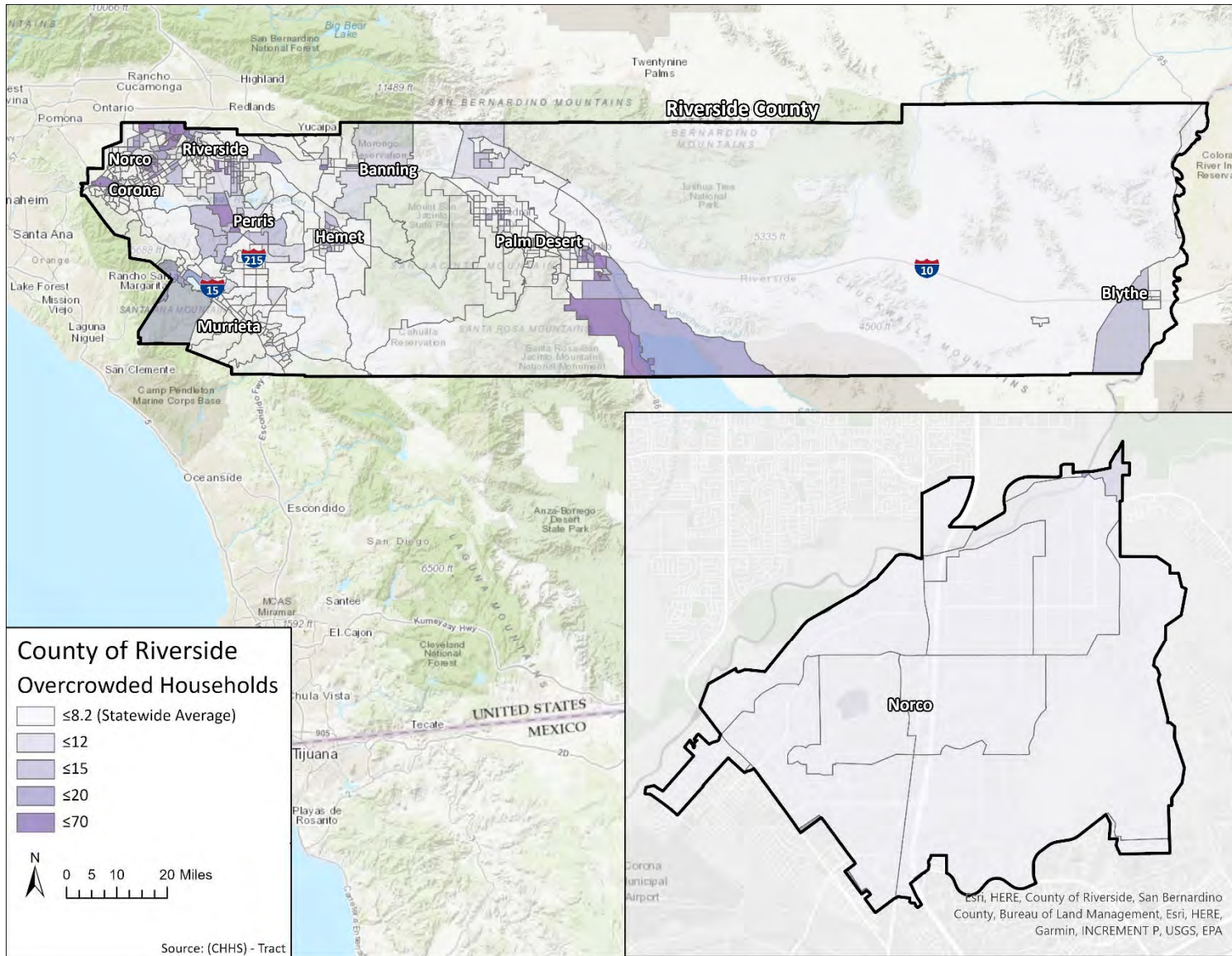
enforcing City ordinances affecting property maintenance, building conditions, and other housing and neighborhood issues as identified by citizens and inter-department staff.

**Table C-8: Age Housing Built**

Year Built	Number of Units	Percent of Units
Before 1940	205	2.7%
1940-1949	273	3.7%
1950-1959	810	10.8%
1960-1969	1,582	21.2%
1970-1979	2,151	28.8%
1980-1989	765	10.2%
1990-1999	579	7.7%
2000-2009	1,072	14.3%
2010 or later	35	0.5%
<b>Total</b>	<b>7,472</b>	

Source: 2015-2019 American Community Survey 5-Year Estimates

Figure C-16: Distribution of Overcrowded Households



## *Displacement*

Neighborhood change is influenced by three processes: movement of people, public policies and investments, such as capital improvements and planned transit stops, and flows of private capital (California Department of Housing and Community Development, 2021). Displacement can broadly be understood to be caused by disinvestment, investment-fueled gentrification, or a process combining the two. Low-income neighborhoods experience displacement due to disinvestment resulting from both public and private sector decisions. Similarly, both public and private investments fuel displacement by attracting residents with higher incomes and higher educational attainments into low-income communities. These processes can disproportionately impact people of color, as well as lower income households, persons with disabilities, large households, and persons at-risk or experiencing homelessness.

The University of California Berkley developed a Sensitive Communities map to identify communities sensitive to displacement as a result of neighborhood changes. Sensitive communities are defined based on the following set of criteria:

- The share of very low-income residents is above 20 percent.

The tract must also meet two of the following criteria:

- The share of renters is above 40 percent.
- The share of people of color is above 50 percent.
- The share of very low-income households (50 percent AMI or below) that are severely rent burdened is above the county median.
- They or areas in close proximity have been experiencing displacement pressures.

Displacement pressure is defined as:

- The percentage change in rent above county median for rent increases OR
- The difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Based on the Sensitive Communities analysis conducted by the University of California Berkley through the Urban Displacement Project, the County's most vulnerable populations were in and near the cities of Corona, Riverside, Moreno Valley, Perris, Lake Elsinore, Hemet, Banning, Desert Hot Springs, Palm Springs, Indio and Mecca. The City of Norco contained one census tract, census tract 466.01, that was identified as vulnerable to displacement. Census tract 466.01 had the highest percentages of non-White population and rentership within the city. Additionally, the AFFH Data Viewer layer for Urban Displacement Project identified census tract 466.01 as having 30 percent very-low income population. Census tract 466.01 was likely designated as sensitive to displacement due to very-low income population, high rental percentage, and high proportion of non-White population.

Land uses in census tract 466.01 are California Rehabilitation Center, Naval Weapons Station Seal Beach Detachment Norco, Norco College, as well as a small pocket of single-family housing to the southwest. The Naval Weapons Station Seal Beach Detachment Norco is a United States Navy facility that receives federal funding and oversight. Norco College is a two-year public institution of higher education, one of three colleges funded and managed by Riverside Community College District (RCCD). Norco College serves over 16,000 students annually through online education. The Norco campus previously offered some in-person classes but has transitioned to online-only classes only since 2020. The campus now contains administrative offices and facilities. Due to existing land uses, the City of Norco is generally limited in its jurisdiction over movement of people, public policies, and/or flows of private capital within this census tract. The nature of existing land uses likely skew the factors considered by University of California



Berkley in determining displacement risk. Land uses support students (data is from 2017 when in-person classes were still being offered) and rehabilitation patient populations, where residency is predominantly short-term and populations are lower-income. Other census tracts within the city were not identified as vulnerable to displacement. To deter displacement risk within areas under the City's jurisdiction, the City commits to development of a Code Enforcement Program (Action 2.3) that will facilitate repairs of rental properties that serve to mitigate displacement and relocation impacts on residents. Additionally, the program supports in the creation of affordable rental options. Action 5.4, Partnership with the Fair Housing Council for Disparity and Displacement Protection Services., commits to facilitating fair housing education, outreach, and randomized testing to identify social inequities in the community. The City will specifically work with facilities in census tract 466.01 to provide fair housing and affordable housing information to residents in this area. These programs support households vulnerable to displacement.

Geologic and climate forces can increase susceptibility to displacement because of environmental disasters. According to the City's General Plan Safety Element (2013) and Local Hazard Mitigation Plan (2017), the City of Norco is susceptible to wildfire within its hillside areas along the city's northwest and eastern borders. The Safety Element identifies fire protection strategies to combat wildfire risk specific to the various at-risk areas. Additionally, the city contains several flood hazard areas along city drainages near the city's north and west borders, as well as several areas throughout the western half of the city. The City is naturally insulated against extensive natural flooding hazards from the Santa Ana River to the north by steep bluffs that exist along the south bank of the river. The only areas susceptible to flooding would be limited to the Silverlakes Equestrian Center located in the north side of the City, a portion of the Santa Ana Riverbed along the west border, and small pockets of land around the City's flood control channels. The Safety Element identifies flood hazard areas and provides for land uses and facilities within these areas that would minimized risk to lives and property. State legislation requires that the Safety Element be reviewed and updated as necessary alongside the Housing Element. Therefore, the City will update the Safety Element, and as part of the update, will consider changed conditions associated with disaster risk (e.g., new/increased wildfire or flooding hazards and/or available technologies and policies to mitigate such risks) to residents that could affect displacement.

### *Homelessness*

The homeless includes individuals or families who lack or are perceived to lack a fixed, regular, and adequate nighttime residence, or who have a primary nighttime residence in a shelter, on the street, in a vehicle, or in an enclosure or structure that is not authorized or fit for human habitation. People experiencing homelessness are vulnerable to violence and criminalization due to their unhoused status.

The County of Riverside manages a range of coordinated efforts and engages active collaboration among community organizations, churches, service clubs, and concerned citizens dedicated to overcoming homelessness in conducting its annual Point-in-Time (PIT) Count survey. According to the County of Riverside Department of Public Social Services (DPSS), 1,685 individuals in Riverside were unsheltered homeless in 2018, in addition to 631 individuals who were sheltered homeless.

According to the Continuum of Care (CoC) and Riverside County Department of Public Social Services (DPSS) 2020 Homeless Point-in-Time Count and Survey, there were an estimated 2,884 homeless persons on any given day in Riverside County. This assessment estimated 12 homeless persons in the city of Norco.

There are numerous factors that contribute to homelessness in Norco and Riverside County. Difficulties in obtaining employment, insufficient education, mental illness, and substance abuse are a few of the more common factors. In recent history, however, new factors are emerging that significantly contribute to homelessness. The trends that largely are responsible for the rise in homelessness are a growing shortage

of affordable housing, and simultaneous growth in the population of low-income renters, which has correlated with high demand and shrinking supply.

### *Other Data*

#### *Tenure*

Norco’s population is made up of primarily homeowners. According to 2015-2019 ACS data, 83.9 percent of households are owner-occupied, compared to 66.3 percent of households in the county. Additionally, the percentage of owner-occupied units decreased from 2010 to 2019 within the county (70.0 to 66.3), but increased for the city (81.3 to 83.9). Both populations experienced growth from 2010 to 2019. The county experienced growth, numerically, in both homeowners and renters from 2010 to 2019; however, the growth in the renter population outpaced the growth in the homeowner population, causing a decrease in the overall percentage of homeowners. The city experienced a numeric increase in number of homeowners and a decrease in renters from 2010 to 2019.

**Table C-10: Housing by Tenure**

Tenure	City of Norco		Riverside County	
	Estimate	Percentage	Estimate	Percentage
<b>2010</b>				
Owner-occupied	5,764	81.3	467,086	70.0
Renter-occupied	1,323	18.7	199,820	30.0
<b>Total</b>	<b>7,087</b>		<b>666,906</b>	
<b>2019</b>				
Owner-occupied	5,974	83.9	480,944	66.3
Renter-occupied	1,145	16.1	243,949	33.7
<b>Total</b>	<b>7,119</b>		<b>724,893</b>	

Source: 2015-2019 American Community Survey 5-Year Estimates; 2006-2010 American Community Survey 5-Year Estimates

#### *Mortgage Lending*

Initially in mortgage lending, buyers must locate a lender who 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; 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.

Table C-11 shows loan application actions by race in the City of Norco for 2019 as provided by the Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Dataset. Table C-12 further identifies loan denial percentages by race in Norco for 2019. Comparing the proportion each race makes up of the applicant pool to the percentage denied can provide indication as to whether mortgage lending discrimination is occurring.

According to Table C-12, White applicants made up the majority of the applicant pool, accounting for 67.6 percent of applications. Applicants that identified as Native Hawaiian and Other Pacific Islander made up the smallest proportion of applicants, accounting for 0.3 percent. All racial and ethnic applicant categories were relatively representative of their overall population percentage within the city. Denial percentages were also relatively representative of applicant pool percentage by race; however, the Hispanic applicants experienced a higher percentage of denial (28.7 percent) than their proportion of the applicant pool (17.5 percent).

**Table C-11: Loan Application Actions by Race (2019)**

	Loan originated	Application approved but not accepted	Application denied	Application withdrawn by applicant	File closed for incompleteness	Purchased loan	Grand Total
White	833	51	198	175	67	98	1,422
Black or African American	9	-	4	4	4	1	22
Asian	23	4	9	10	3	2	51
American Indian or Alaska Native	7	-	1	-	1	1	10
Native Hawaiian or Other Pacific Islander	4	-	2	1	-	-	7
2 or more minority races	1	-	-	-	1	-	2
Race Not Available	187	6	72	45	28	180	518
Other	19	2	7	3	1	1	33



Hispanic or Latino	190	15	84	36	14	22	361
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Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Dataset, 2019  
Notes: Other includes Free Form Text and Joint applicants

**Table C-12: Loan Applications and Denial by Race**

	Population	Population (proportion of total population)	Applicant Pool (proportion of total applicants)	Denial (proportion of total denials)
White alone	20,879	78.3%	68.9%	67.6%
Black or African American alone	1,262	4.7%	1.1%	1.4%
American Indian and Alaska Native alone	108	0.4%	0.5%	0.3%
Asian alone	1,163	4.4%	2.5%	3.1%
Native Hawaiian and Other Pacific Islander alone	39	0.1%	0.3%	0.7%
Hispanic or Latino	8,788	33.0%	17.5%	28.7%
Total Population	26,670	-	-	-

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Dataset, 2019; 2015-2019 American Community Survey 5-Year Estimates

Note: The sum of percentages for a given category may not equal 100 percent due to overlap between Hispanic ethnicity and races identified. Additionally, not all applicants identified their racial/ethnic backgrounds, or multiple categories were selected.

### C.2.6. Outreach

The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community. AB 686 reinforces and builds on this requirement. Under AB 686 and changes to Housing Element Law, the housing element must also include a summary of fair housing outreach and capacity.

Public participation is summarized in Section 1.5 of the Housing Element. Several stakeholder groups were invited to participate in the planning process, including FHCRC and other fair housing partners and advocate groups. Outreach efforts made and public participation opportunities provided included the following:

- Postcards/mailings;
- Promotion on social media;
- Custom Housing Element Update webpage;
- Electronic billboard notices at City entries;
- Virtual public workshop (March 25, 2021, 6 p.m.); and
- Planning Commission study session conducted in conjunction with a regularly scheduled meeting (April 14, 2021, 7 p.m.).

- Planning Commission meeting (September 8, 2021, 6 p.m.)
- Stakeholder virtual meeting (September 27, 4 p.m.)
- City Council meeting (October 6, 2021, 7 p.m.)

The public workshop and Planning Commission meeting were both available to attend via livestream or by telephone. Remote accommodations provided opportunities to those with geographic barriers to participation. The Planning Commission meeting was also open to the public and allowed in-person attendance. Follow-up Planning Commission and City Council meetings were held as hybrid meetings, with both in-person and virtual options available to the public. Additionally, a stakeholder meeting was conducted via Zoom.

Meetings were held outside of work hours, during evenings, to facilitate participation. Additionally, a stakeholder meeting was held on September 27<sup>th</sup> at 4 p.m. via Zoom for open discussion. Stakeholders that were invited to this meeting were groups (including nonprofit) that have been identified as influential to the development of housing and the provision of services in the community and are listed in Section 1.5 of the Housing Element. Meetings were recorded and posted on the City website for those who were unable to participate and wanted to watch the meetings at a later time. Housing element outreach was conducted in accordance with the SB 1000 (2016). Drafts of the housing element were made available to the public for review and comment. Comments were incorporated into the adopted Housing Element for resubmission to the Department of HCD for review.

### C.2.7. Summary of Fair Housing Issues

#### *Findings from 2019 Regional Analysis of Impediments to Fair Housing Choice*

The City of Norco participated in the 2019 Riverside County Analysis of Impediments to Fair Housing (2019 A.I.). The 2019 A.I. determined the following were impediments to Fair Housing Choice in Riverside County.

- Discrimination against Persons with Disabilities: Consistent with findings in the 2014 A.I., nearly 63 percent of the discrimination complaints in the County of Riverside between 2013-2018 were on the basis of physical or mental disability. Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations. This impediment was addressed during the 2013-2018 planning period through education and outreach to housing providers through workshops, audits, information and referrals. However, given the high percentage of all fair housing complaints received by FHCRC between 2013-2018 were on the basis of disability, this impediment has not been adequately addressed.
- Siting and Standards for Transitional and Supportive Housing: Review of the County's 2017-2021 Housing Element of the General Plan and County Ordinance 348 governing land use planning and zoning in the County of Riverside revealed that transitional and supportive housing are not currently defined in the Ordinance and are not treated as a permitted use in residential zones.

Of the discrimination complaints filed in the County of Riverside between 2013-2018, none originated from the City of Norco. Therefore, discrimination against persons with disabilities is not considered applicable to the City as an impediment to Fair Housing Choice. Additionally, transitional and supportive use definitions are included in the City's Zoning Code and are permitted in residential zones in compliance with State law. Therefore, neither condition identified in the County's 2019 A.I. are applicable to the City.

### *Summary of Additional Fair Housing Concerns*

Additional fair housing concerns identified as part of this Housing Element update are summarized below:

- City of Norco census tract 410.04 scored 90.20 percent for overall CalEnviroScreen Score. This tract also experiences a greater percentage of low to moderate income households and a predominant population of Hispanics. Census tract 410.04 also experienced the highest percentage of overcrowded living conditions (11.01 percent). Indicators suggest a potential for disproportionate access to opportunities and housing needs for this specific region of the population.
- Non-White households experienced a greater proportion of housing problems than White households within the city. The City has a program, Action 3.2 Home Rehabilitation Program, to investigate new funding opportunities for provided funding resources to qualified lower-income homeowners to repair or improve their homes. Such program would support households with special needs in addressing housing problems.
- Household types that experienced the greatest percentage of overall housing problems (which includes cost burden) in Norco were non-family households, followed by large family households, and small family households. This trend was consistent with the percentage of renters by household type, indicating a possibility that renters are more likely to experience housing problems than homeowners in the city.
- Non-family households experienced the greatest percentage of severe cost burden within Norco and Riverside County. The percentage of non-family households was substantially higher than family households; however, the percentage of non-family households with severe cost burden (27.95) was similar to the county's percentage of non-family households with severe cost burden (27.00). The 2019 A.I. found that the number of family households married without children, other families, and non-families are generally increasing, while families married with children are generally decreasing. This could indicate that there is a lack of housing affordable for non-families and single persons that do not rely on two incomes for living expenses.
- Majority of renters within city census tracts had over 40 percent cost burdened households, while majority of homeowners within city census tracts had less than 40 percent cost burden. Due to lack of rental options available in the city, renters could experience lack of affordable options.
- Hispanics experienced a higher percentage of denial (28.7 percent) than their proportion of the applicant pool (17.5 percent) based on 2019 mortgage lending data.

#### **C.2.8. Local Data and Knowledge**

Based on data from Nextdoor, a free social media platform provides neighbors within the same geographical area the ability to share information and communicate information, including neighborhood updates, polls, events, ask for recommendations, as well as list items for sale. Neighborhoods, as identified by residents on Nextdoor, include California Avenue, Crestview, Longhorn Way, Old Town North of 7<sup>th</sup>, JR Spread, Norco Bluffs, Norco Ranch, Norco Ridge Ranch, and South Norco. Some common characteristics that Nextdoor users identified as favorable about their community were “quiet,” “dog friendly,” “family friendly,” “safe,” “rural,” “hills,” “trails,” and “neighbors.”

During the virtual public workshop held on March 25, 2021, the public was able to provide questions and comments regarding the housing element process, as well as general information to consider while developing the analysis and policies for the housing element. A poll conducted during the meeting revealed that 69 percent of attendees felt Norco has enough housing to meet the needs of its residents and 63 percent of residents felt that housing in Norco is affordable. One resident expressed concern that new housing



would impact the small-plot agricultural lifestyle that attracted them to the city. The small-plot agricultural lifestyle is an important component of the city's character, as identified by the City's General Plan Land Use Element.

Comments were not provided regarding local demographics or impediments to fair housing during public outreach. However, Figure C-17 identifies distribution of White and Hispanic population majority across census tracts, the two largest populations of race and ethnicity in the city. Census tracts 466.01, 406.16, and 410.04 are majority Hispanic, while all other tracts are majority White population. Census tract 466.01 land use includes Naval Weapons Station Seal Beach Detachment Norco and Lake Norconian. Census tracts 407.01 and 410.04 overlap the cities of Eastvale and Jurupa Valley.

### **C.2.9. Other Contributions**

Other contributions that affect the accumulation of wealth and access to resources include historically disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

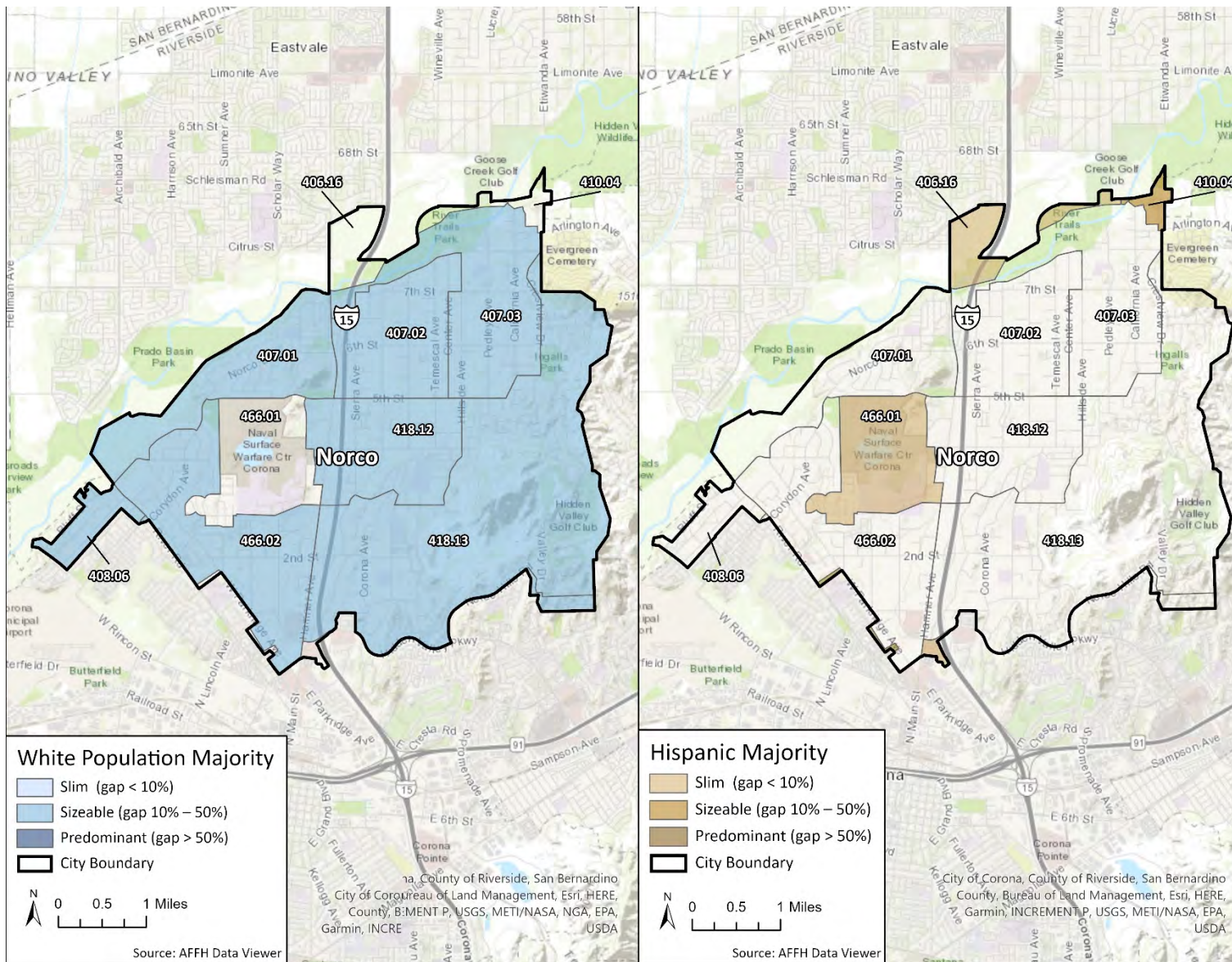
The Norco Public Works Department invests in its infrastructure through its rolling five-year Capital Improvement Program (CIP). Using various funding sources (revenues generated from ratepayers and user fees, grants, and bonds), the City acquires, repairs, or replaces the major assets needed to deliver its services (water, sewer, streets, trails, streetlights, traffic signals and storm drains) to the City's residents and businesses. The CIP includes extensive water and sewer main replacement, replacement of aging equipment, street reconstruction and paving, street striping, horse trails and trail fencing, new storm drains, new water and sewer treatment plants, and a variety of other projects.

Currently, the City is in the process of completing the design and construction of various capital improvement projects approved and budgeted by City Council for fiscal year 2020-2021. The City has included an interactive map on the City website that identifies the type of projects the City has planned for fiscal year 2020-21, their location, and the latest details about each project (schedule, costs, completion rate, etc.). The interactive map also has project data from past fiscal years.

Effectiveness: The City was able to achieve its objective effectively, identifying capital improvements citywide. The City website includes project information for years 2017 and onward. Between Fiscal Year 2020 and 2021, the City actively worked on 98 CIP projects, and 14 projects were completed. Projects captured on the City's interactive map range widely throughout the City, concentrated where existing public infrastructure is located.

Additionally, Appendix A includes housing currently under covenants per AB 987. Housing includes 28 single-family residences and three senior housing facilities. Single-family units include ownership housing purchased under the First time Homebuyer Program or the Infill Housing Program. All units will continue to provide affordable housing within the covenant restriction expiration date.

Figure C-17: Distribution of Predominantly White and Predominantly Hispanic Population



### C.3. Sites Inventory

The Norco Land Use Element and Zoning Code provide residential development opportunities to accommodate the City's 2021-2029 Regional Housing Needs Allocation (RHNA). The City has zoned sites applying the Housing Development Overlay (HDO) to underutilized and vacant land. Figure C-18 illustrates the location of the sites inventory for RHNA

Norco's Regional Housing Allocation for the 2021-2029 planning period is a total of 454 housing units, including 145 units for very-low-income households, 85 units for low-income households, 82 units for moderate-income households, and 142 units for above moderate-income households. As shown in Figure C-18, sites to accommodate RHNA are located west of the Interstate 15 in tracts 408.12, and 466.02. These sites are not concentrated in areas of racial and income segregation as further discussed below.

- **Improved Conditions:** The 2014-2021 Housing Element identified five sites for residential development, one of these sites has been maintained as a housing site within the 2021-2029 Housing Element. Because this site has been recycled from the previous planning cycle, HDO zoning allows for up to 30 dwelling units per acre without discretionary approvals if at least 20 percent of units are affordable to low-income households. The site has been split into two sites for the 2021-2029 Housing Element update as seen in Figure C-18. Additionally, two new sites have been added to accommodate the City's RHNA. To accommodate lower income RHNA units, the City will incentivize the development of affordable housing through density bonuses, development fee modifications where feasible, reduction of development standards, and funding for offsite improvements where budget allocation permits. In addition, to encourage the preservation of the city's rural aesthetic and historical pattern, the City will provide a density bonus for the provision of equestrian facilities and/or parkland above the city's open space requirements.
- **Exacerbated Conditions:** Sites within the HDO zone, which allows 50 to 100 percent of the site to be developed with residential use, may be developed for mixed-use, additional residential uses, and/or nonresidential uses as permitted by the underlying zone on remaining acreage. Mixed-use development can provide a variety of economic opportunities to residents of all income levels, including low-income, while simultaneously increasing access to resources. The City's current site inventory and approach to accommodate future growth through the Housing Development Overlay is an effective strategy to meet the City's 2021-2029 RHNA allocation.
- **Isolation of the RHNA:** Spatial analysis showed that tracts 408.12 and 466.02 have different percentages of low to moderate income households, concentrated minorities, or other housing conditions. For example, tract 466.06 has a greater percentage of low to moderate income households compared to tract 408.12; whereas tract 466.06 is identified as a highest resource area in comparison to tract 408.12, which is identified as a high resource area. With this distribution, the City's site inventory is not concentrated in a single geographical area that experiences greater social, economic, or environmental disparities.

#### C.3.1. Integration and Segregation: Race and Income

Census tracts with the highest concentration of minority races, in this case, a Hispanic majority, are located west of Interstate 15 (tract 466.06) and the northern tract bordering Jurupa Valley (tract 406.16). As shown in Table C-13 below, census tract 408.12 contains 47.63 percent non-White population and census tract 466.02 contains 50.03 percent population. Both percentages are similar to the City average of 47.93 percent.



Additionally, tracts with a greater percentage of low- and moderate-income populations are scattered throughout Norco with tract 466.02 being located to the southwest, and tract 410.04 at the very northeast border of the city. The site inventory identifies two sites within tract 466.02 that are zoned with C-G (Commercial General) and two sites within 408.12 that are zoned HDO with an underlying zoning of C-G (Commercial General). Sites at Second Street and River Road in tract 466.02 would be rezoned with HDO over the existing zoning designation. As shown in Table C-13, tract 466.02 has a 28.23 percent low- to moderate-income population, which is slightly greater than the City's average of 25.13 percent. Tract 408.12 has a 21.49 percent low- to moderate-income population, which is lower than the City average. As previously mentioned, the HDO zoning designation incentivizes the development of affordable housing. The housing allocated to all four housing sites includes 32 percent very low-, 19 percent low-, 18 percent moderate-, and 31 above moderate-income housing.

The City's strategy of selecting two sites within tract 466.02 will offer housing opportunities to minority and lower-income groups, as well as attract new market rate housing, within this tract and consequently integrate people of varying races and income classes. Similarly, by attracting development of affordable housing to tract 408.12, the area would diversify and deconcentrate socioeconomic classes. Therefore, diversification of housing affordability within the selected sites would be considered an improvement to socioeconomic conditions within the city.

**Table C-13. Sites Demographics**

Area	Non-White Population (Percent)	Low to Moderate Income (Percent)
Census tract 408.12	47.63	21.49
Census tract 466.02	50.03	28.23
City Average	47.93	25.13

Source: AFFH Data Viewer

### C.3.2. Racially/Ethnically Concentrated Areas of Poverty and Affluence

While no racially/ethnically concentrated areas of poverty (per HUD's definition) were found in Norco, only one tract was identified in the City to have 10 to 20 percent of population whose income in the past 12 months is below poverty level (tract 408.12). In contrast, census tract 466.02 includes only 3.40 percent of population considered poverty status, as seen in Table C-14. The City's site inventory includes two housing sites within tract 408.12. The RHNA allocated to all four housing sites would include 32 percent very low-, 19 percent low-, 18 percent moderate-, and 31 above moderate-income housing. These sites would not only introduce affordable housing options for low-income households, but also facilitate development of housing of all income levels which would diversify the housing stock and income populations in both census tracts.

**Table C14. Areas of Poverty**

Area	Percent
Census tract 418.12	18.80
Census tract 466.02	3.40

City Average	6.38
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Source: 2015-2019 American Community Survey 5-Year Estimates

### C.3.3. Access to Opportunity

Norco consists of 10 tracts, the vast majority of which are considered high and highest resource opportunity areas (Figure C-1). Due to the city’s high access to opportunity, the housing units in the site inventory are not disproportionately concentrated in different resource areas as seen in Table C-15. Overall, Norco, indiscriminate of location, has an abundance of access to opportunity relative to other jurisdictions within the county. All four sites are currently or will be zoned HDO, which allows 50 to 100 percent of the site to be developed residential and remaining acreage to be developed with the underlying zoning. All four housing sites have an underlying commercial zoning designation. Mixed-use development can provide a variety of economic opportunities to residents of all income levels, including low-income, while simultaneously increasing access to resources.

TableC-15. TCAC Opportunity Areas

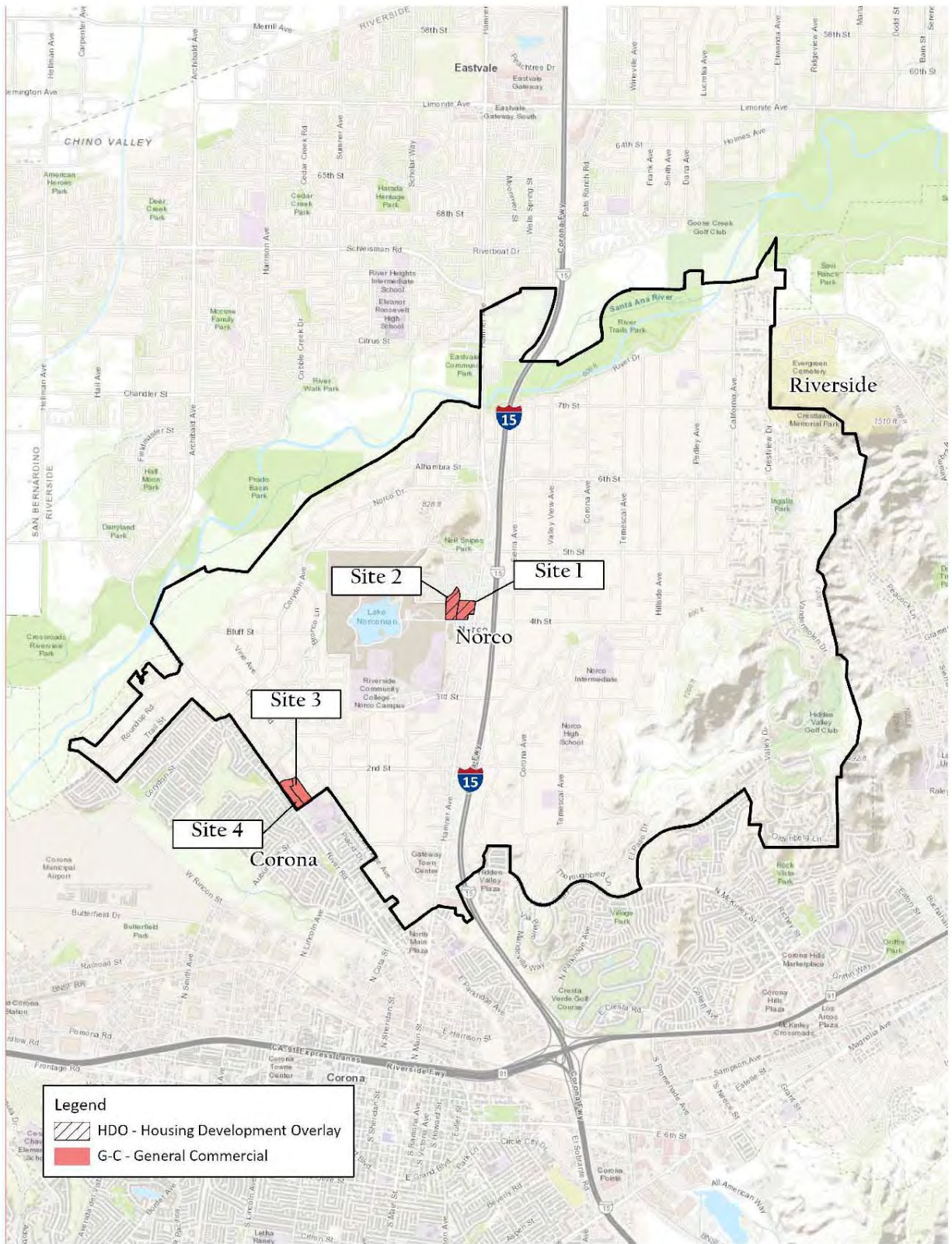
Area	Index Score
Census tract 418.12	.43
Census tract 466.02	.53
City Average	.56

Source: AFFH Data Viewer

### C.3.4. Disproportionate Housing Needs

The County’s assessment of impediments found a need for affordable housing indicating that the lack of available housing is a housing market condition whereby there are an insufficient number of units available to accommodate individuals and households at all income levels. The City incentivizes the production of affordable housing in the site inventory through their HDO zoning overlay. The HDO permits a density of 20 to 30 units per acre without discretionary approvals if at least 20 percent of the units are affordable to low-income households and the site has been recycled from a previous housing element planning cycle. Sites designated as HDO are 50 to 100 percent developable with residential use and the remainder is available for development with the underlying zone’s permitted uses. The RHNA allocated to all four housing sites would include a ratio of 32 percent very low-, 19 percent low-, 18 percent moderate-, and 31 above moderate-income housing. These sites would not only introduce affordable housing options for low-income households, but also facilitate development of housing of all income levels which would diversify the housing stock and income populations according to housing affordability ratios prescribed through the City’s RHNA.

Figure C-18: Location of Sites to Meet RHNA



### C.3.5. Sites Analysis Conclusion

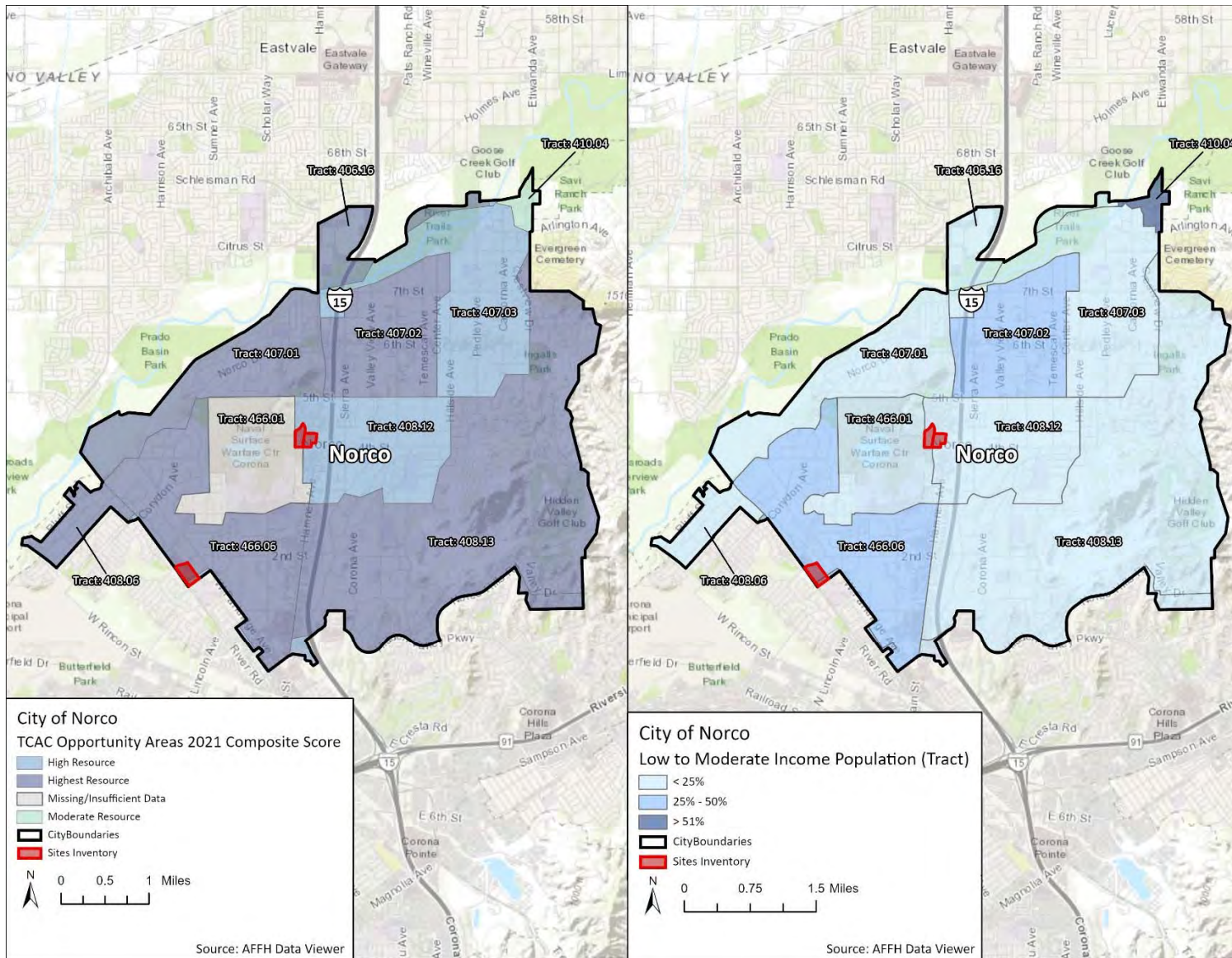
A primary goal of the assessment is to ensure available sites for lower-income housing are located equitably across a region and within communities with fair access to opportunities and resources. Ensuring that sites for housing, particularly lower income units, are in high resource areas rather than concentrated in areas of high segregation and poverty requires jurisdictions to plan for housing with regards to the accessibility of various opportunities including jobs, transportation, good education, and health services.

Figure C-19, below shows the location of the sites inventory compared to the distribution of low- and moderate-income populations and the TCAC/HCD Opportunity Areas by census tract. Both figures, and Table C-15 above, highlight that these sites are located in higher opportunity areas. An examination of the opportunity areas identified by HCD and TCAC shows the City of Norco does not contain any low resource areas, and ranges in opportunity from moderate resource to highest resource, although the only census tract identified as moderate resource is predominately within a neighboring jurisdiction. Using the statewide opportunity area map as an overlay to the City's sites inventory, the City was able to identify that the selected sites will accommodate affordable housing in high and/or moderate opportunity areas.

Norco is largely a built-out community with limited sites available for new housing. When evaluating the sites relative to socio-economic patterns within the city, the analysis does not indicate an overconcentration of sites in low resource areas or concentrated areas of poverty. Of the four housing sites proposed, all of which would be anticipated integrate all levels of housing affordability, Sites 1 and 2 are in a high resource opportunity area and Sites 3 and 4 are in a highest resource opportunity area. None of the sites are in an area of substantial low-income population (greater than 50 percent). It can be concluded that the City's site inventory will improve current conditions by encouraging a diverse housing market that will attract people from all races and income levels in these areas. Therefore, the City meets the goal of providing sites for all types of housing, including low-income housing, in high resource and affluent areas.



Figure 19. Sites Inventory in Relation to Low to Moderate Income Census Tracts and TCAC/HCD Opportunity Areas



## C.4. Identification and Prioritization of Contributing Factors

The following are contributing factors that affect fair housing choice in Norco. Programs identified in the Housing Element would address the factors identified, which include metrics to implement and evaluate effectiveness.

### C.4.1. Housing Problems for Non-families

The analysis found that non-families experienced the greatest percentage of housing problems, and further, the greatest percentage of severe cost burden. The 2019 A.I. found non-families to be among the fastest growing cohort of household within the county. Conversely, City data showed an overall decline in non-family households from 2010 to 2019. Non-families may rely on rental housing, as indicated by trends identified with city census data, which Norco has relatively little of compared to the overall County rental housing stock. This may indicate that non-families, including single persons, do not have access to affordable rental housing within the City of Norco and are opting to live in other more affordable areas within the county.

Contributing Factors:

- Lack of City-funded assistance programs
- Limited rental options
- Availability of affordable housing

### C.4.2. Housing Problems for Non-White Population

Non-White households experienced a slightly greater proportion of housing problems than White households within the city. The race and ethnicity that experience the greatest severe cost burden in Norco are Other and Hispanic. Hispanics also experienced a higher percentage of denial on home mortgage loans than other race and ethnicities. Therefore, non-White households may experience greater housing problems (including cost burden), specifically the Hispanic population, than the predominant White population within Norco. However, Norco has higher index scores than Riverside County nearly across the board, meaning that members of most racial and ethnic groups experience a better standard of living by various measures than their counterparts within the greater statistical region. Census tracts 466.01, 406.16, and 410.04 are majority Hispanic, while all other tracts are majority White population. Census tract 466.01 land use includes Naval Weapons Station Seal Beach Detachment Norco and Lake Norconian. Census tracts 407.01 and 410.04 overlap the cities of Eastvale and Jurupa Valley.

Contributing Factors:

- Mortgage lending discrimination
- Limited rental options
- Availability of affordable housing

### C.4.3. Concentration of Disproportionate Access to Opportunities and Housing Needs

Census tract 410.04 was the only tract to be identified as moderate resource (all others were high or highest) and has having notable levels of environmental burden, low to moderate income, and overcrowding. Also, this Census tract has a predominant Hispanic population. These indicators suggest that this specific region of Norco experiences disproportionately low access to opportunities and housing needs compared to all other Census tracts within Norco. Census tract 410.04 overlaps several jurisdictions,

with most of its area overlapping the city of Jurupa Valley. Therefore, indicators may represent an influence of outside areas rather than city-specific policy and influence.

Contributing Factors:

- Outside areas of influence
- Limited rental options
- Availability of affordable housing

#### **C.4.4. Addressing Contributing Factors**

Following completion of this AFFH analysis, the City has evaluated the goals, programs, and actions within the 2014-2021 Housing Element in the context of contributing factors that may be affecting fair housing choice within the city. As a result, the City has revised existing and created new housing element actions and objectives to remove constraints to fair housing, encourage development of affordable housing, and support special needs populations in fair housing issues. Table C-12 below includes actions within the updated 2021-2029 Housing Element that specifically address factors contributing to fair housing issues identified in this AFFH analysis. Action 5.1 is inclusive of the following actions to address disparities in housing access and need.

Table C-16: City Actions to Further Fair Housing

AFFH Fair Housing Issue	Contributing Factors	City Actions
<p><b>Housing Mobility</b></p>	<ul style="list-style-type: none"> <li>Limited rental options</li> <li>Availability of affordable housing</li> <li>Mortgage lending discrimination</li> </ul>	<ul style="list-style-type: none"> <li>Action 3.3 (Monitor Affordable Units): The City will keep their AB 987 Affordable Housing Database posted on its website and will continue to track affordable housing units citywide through the annual certification process. In addition, as the City develops additional affordable units, these properties will be added to the table and will be monitored annually to ensure they meet affordability requirements. Additionally, the City will develop waiting lists for persons with disabilities, through efforts such as coordination with regional centers for developmental services, and will target those lists to property owners renting affordable units (e.g., ADUs). Similarly, the City will develop and maintain a waiting list/contact list of low-income persons seeking affordable housing. The City will advertise affordable rentals on the City's website and provide housing advertisement efforts via creative marketing strategies and facilitate tenancy through use of their waiting lists. City housing services would provide mobility opportunities for persons seeking affordable housing or housing for persons with disabilities.</li> <li>Action 3.4 (Housing Financial Assistance Program): As a means of further leveraging housing assistance, the City will cooperate with the Riverside County Economic Development Agency (EDA) and Riverside County Housing Authority to promote resident awareness and application for County-run housing assistance programs (such as the First-time Home Buyer Down Payment Assistance Program and Mortgage Credit Certificate Program). The City will increase resident awareness about housing programs offered by the County by providing information at City Hall and on the City's website. Information dissemination of available assistance programs would support residents in removing barriers to housing in areas of opportunity or areas that would otherwise be unaffordable/unavailable to them.</li> <li>Action 4.6 (First Time Homebuyer Program): To provide additional assistance for low- and moderate-income households, the City will investigate funding to create a First Time Homebuyer Program. The program will financially support first time homebuyers in removing barriers to housing in areas of opportunity or areas that would otherwise be unaffordable/unavailable to them. The city is almost entirely classified as high opportunity area.</li> </ul>
<p><b>New Housing Choices and Affordability in Areas of Opportunity</b></p>	<ul style="list-style-type: none"> <li>Limited rental options</li> <li>Availability of affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>Action 2.1 (Elimination of Affordable and Special Needs Housing Development Standard Constraints): The City will meet with local special needs and affordable housing community organizations to strategize ways to eliminate zoning and other regulatory barriers to the placement and operation of housing facilities for the homeless and special needs populations throughout the City on an annual basis (by June 30th), such as: <ul style="list-style-type: none"> <li>Bridge Housing Corporation</li> <li>Catholic Charities</li> <li>Housing Authority of the County of Riverside</li> <li>Habitat for Humanity</li> <li>Jamboree Housing</li> <li>Lutheran Social Services</li> <li>National CORE</li> <li>Neighborhood Partnership Housing Services, Inc.</li> <li>Riverside County Economic Development Agency</li> <li>Riverside Housing Development Corporation</li> <li>Wakeland Housing and Development Corporation</li> <li>California Veterans Assistance Foundation, Inc.</li> </ul> <p>City will update Zoning and Municipal Code annually to remove constraints identified as appropriate (if any) during meetings with local special needs and affordable housing community organizations (by December 31st). Incentives for extremely-low-income housing will be encouraged to prioritize the development of units for this income group. The City will develop a process for reducing, subsidizing, or deferring development fees and offering faster permitting time periods to facilitate the provision of affordable housing by June 2022. By working with local special needs and affordable housing community organizations to strategize ways to eliminate zoning and other regulatory barriers, the City will facilitate housing supply, choices and affordability in areas of high opportunity (majority of the city). These processes would be above and beyond the requirements of SB 35 (Action 2.2).</p> </li> <li>Action 2.3 (Accessory Dwelling Unit Development): The City recognizes that Accessory Dwelling Units (ADUs) provide a unique opportunity to create affordable units in residential areas, particularly for elderly residents. Consequently, during prior planning periods, Staff reviewed and updated the ADU ordinance to comply with State law and to ensure that no constraints exist to the development of ADUs in the City. The City will administer its updated ADU ordinance and will promote the ordinance online, at City Hall, through their Newsroom notification service, and on social media. Additionally, the City will allocate \$250,000 in funding from the Housing fund to subsidize up to 10 ADU units to be affordable to low- to extremely-low-income households over the planning period (program to be adopted by June 2022). ADUs would provide additional rental options that more affordable than other existing housing options within the city. Subsidizing ADUs will ensure affordability for low- to extremely-low-income households. Therefore, this program will facilitate in the creation of affordable housing.</li> <li>Action 2.4 (Affordable Housing Development Fee Subsidy Program (including housing for extremely-low, low, and special needs households)). The City shall strategize the establishment of a program to help subsidize a portion of the application processing fees for developments in which five percent of units are</li> </ul>



		<p>affordable to extremely-low-income households. The City will apply for applicable grant and funding opportunities that could be applied towards creation of an application subsidy program biannually (during odd years beginning 2023). If funding is awarded, a City planner would be dedicated to managing the program. The City will disseminate information on fee subsidies for projects that include units affordable to ELI households at City Hall, on the City's website and in other public places, and by creating a handout to be distributed with development applications. Fee subsidies will support in the creation of new affordable housing choices.</p> <ul style="list-style-type: none"> <li>• Action 4.1 (Housing Opportunity Sites): To encourage the development of residential projects with affordable units, the City will meet with landowners to facilitate redevelopment on vacant sites and severely underutilized sites within the HDO zone. To further encourage development, the City may offer landowners a menu of incentives, including: development fee modifications, fast-track processing, density bonus incentives, reductions in development standards, and funding for off-site improvements, as indicated in the Housing Plan. Funding for these regulatory and financial incentives will be provided through CDBG funds and other funding sources as they become available. The City will also prioritize funding for projects that incorporate units for extremely-low-income households. This action is in combined effort with commitments under Action 2.1. Incentives will support in the creation of new affordable housing choices.</li> <li>• Action 5.2 (Promoting Housing for Developmentally Disabled Persons Program): To accommodate residents with developmental disabilities the City will seek State and federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities, including developmental disabilities. Norco will also provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals, budget permitting, to projects targeted for persons with disabilities, including persons with developmental disabilities. To further facilitate the development of units to accommodate persons with developmental disabilities, the City shall reach out annually to developers of supportive housing to encourage development of projects targeted for special needs groups. Finally, as housing is developed or identified, Norco will work with the Inland Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities by January 1, 2023.</li> </ul>
<p><b>Place-Based Strategies to Encourage Community Revitalization</b></p>	<ul style="list-style-type: none"> <li>• Lack of City-funded assistance programs</li> </ul>	<ul style="list-style-type: none"> <li>• Action 3.1 (Code Enforcement Program): As the housing stock continues to age, the enforcement of existing property maintenance codes is a primary means to preserve housing and the quality of neighborhoods. The City is committed to development of a proactive code enforcement program that targets areas of concentrated rehabilitation needs and unpermitted ADUs, which will facilitate repairs by owners and will serve to mitigate displacement and relocation impacts on residents by December 2022. The City will also create an educational campaign to post on the City's website and host an annual workshop educating residents on ADUs, including the permitting process for new units and how to bring unpermitted units into compliance.</li> <li>• Action 3.2 (Home Rehabilitation Program): The elimination of the City's Redevelopment Agency during a prior planning period resulted in the loss of a direct funding resource for this program. Consequently, for the 2021-2029 planning period, the City will annually investigate and pursue new funding opportunities and administer funds as they become available, with the goal of supporting six home rehabilitations during the 2021-2029 planning period, at an approximate cost of \$300,000 (average \$50,000 per home). This program would target areas of concentrated rehabilitation needs and financially support households that are otherwise unable to afford required rehabilitation efforts.</li> <li>• Action 5.3 (Fair Housing Support for Spanish Speaking Households): Non-White households experienced a slightly greater proportion of housing problems than White households within the city. The race and ethnicity that experience the greatest severe cost burden in Norco are Other and Hispanic. Hispanics also experienced a higher percentage of denial on home mortgage loans than other race and ethnicities. Language barriers may contribute to constraints currently faced by the Hispanic population. The City will provide bilingual communications, including but not limited to interpreters and translation services, in official governmental actions and communications including meeting and hearing notices and presentations in order to facilitate participation in City public hearings and informational events by December 2023. City informational resources for housing services and programs will be translated and provided as well. Translation services will provide communications of City-actions and information (such as decisions, programs, investments, and policies) to facilitate participation in City workshops and hearings, obtain meaningful feedback, and better serve the City's Spanish-speaking community.</li> </ul>
<p><b>Protecting Existing Residents from Displacement</b></p>	<ul style="list-style-type: none"> <li>• Limited rental options</li> <li>• Limited rental options for non-family</li> <li>• Availability of affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>• Action 4.9 (Incentives for Large Multifamily Units): The City is generally limited in rental housing inventory, especially for large family and non-family households who may require additional bedroom units (three or more). It is crucial that affordable units constructed in the City are available for families, as well as other special-needs groups; however, larger units are often more costly to develop. The City will prioritize incentives for developers to encourage the inclusion of units with three or more bedrooms to accommodate low-income large-family households. The City will develop incentives to encourage development of housing units with three or more bedrooms by June 2022. The City will generate 41 affordable units with three or more bedrooms to accommodate low-income large-family households, or approximately 18 percent of the City's affordable housing RHNA (41 units/ 230 low- and very low-income units) within the HDO zone to meet the percentage of large-family households within the City over the planning period. Housing units will address constraints on housing for non-families and large families within the City through new housing choices and affordable options in high opportunity areas.</li> <li>• Action 5.1 (Fair Housing Program): The Fair Housing Council of Riverside County, Inc., implements the policies and practices for fair housing in Norco and takes action on any circumstances that affect equal housing opportunities. The City refers all inquiries for these services to the Fair Housing Council and also maintains literature and informational brochures at City Hall that are available for public distribution. The City will provide multi-lingual informational materials on fair</li> </ul>

		<p>housing practices at a variety of public locations throughout the City. Additionally, the City will continue to participate with the Fair Housing Council of Riverside County, Inc. and take actions to fair housing impediments, including posting various resources on the City's website to assist disadvantaged and low-income communities such as foreclosure prevention and financial management assistance programs. Fair Housing Council of Riverside County, Inc. will be requested to conduct random testing at least once every five years in Norco (testing to be conducted 2023 and 2028) in order to identify housing social inequities in the community. Based on findings from the testing, a report will be prepared to identify specific actions the City can take to address identified inequities over the 5-year period (2023-2028 and 2028-2033). Inequities would be reevaluated during the following random test to determine whether the previously identified inequity was effectively addressed or if City actions should be revised and reassessed during the next 5-year test.</p>
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