



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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DRAFT – June 2020

CITY OF CHINO HILLS, CALIFORNIA

Community Services Department

Prepared for the City of Chino Hills by
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CHAPTER 1.

INTRODUCTION

Affirmatively Furthering Fair Housing

Equal access to housing choice is crucial to America's commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD's housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities, such as Chino Hills, that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an "Analysis of Impediments to Fair Housing Choice" (AI). In an AI, communities evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choice for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulates that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD's final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provides publicly available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally determined priorities and goals. HUD's final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. HUD's data and maps remain available for grantees to use in preparing their AIs.

Mosaic Community Planning assisted the City of Chino Hills with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows the requirements in HUD's *Fair Housing Planning Guide* but is also compliant with the regulations and assessment tool established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

Definitions

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Fair Housing Choice - In carrying out this Analysis of Impediments to Fair Housing Choice, the City of Chino Hills used the following definition of “Fair Housing Choice”: The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

² U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD's definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowner's insurance, and any homeowners' association fees.

Data Sources

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as "100% data," meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the "long form" Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- **ACS Multi-Year Estimates** – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) – HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD’s latest data and maps, AFFHT0004, which was released in November 2017. HUD’s source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD’s Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation available online at <https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf>.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous local plans and works of research conducted for the City of Chino Hills, including: the 2013-2018 Five Year Consolidated Plan, the FY 19-20 CAPER, the FY 19-20 Action Plan, and the 2014-2021 Housing Element.

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

Community Engagement Overview

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in the Chino Hills region. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including a public meeting, a community event, stakeholder interviews, and a communitywide survey.

NEARLY 500 RESIDENTS AND OTHER STAKEHOLDERS GAVE INPUT FOR THIS AI THROUGH MEETINGS, FOCUS GROUPS, INTERVIEWS, AND A SURVEY.

Public Meeting

A community meeting open to the general public was held to inform the public about and gather information for the Analysis of Impediments to Fair Housing Choice and Consolidated Plan. The AI portion began with a short presentation providing an overview of the study followed by an interactive discussion of fair housing, neighborhood conditions, and community resources in Chino Hills and the region. A total of five members of the public attended the meeting. The meeting date, time, and location is shown below:

Public Meeting

Thursday, July 18, 2019

2:00 PM

Chino Hills Community Center

14250 Peyton Dr., Chino Hills, CA, 91709

Participation in Community Events

In addition to the public meeting, the project team set up a table at a movie night held at the Chino Hills Community Center and provided attendees with a shortened paper version of the communitywide survey, which included questions regarding housing and public facilities/ infrastructure needs in Chino Hills. The event date, time, and location are shown below:

Movie Night

Thursday, July 18, 2019

6:00 PM

Chino Hills Community Center

14250 Peyton Dr., Chino Hills, CA, 91709

Stakeholder Interviews

In November and December 2019, individual and small group stakeholder interviews were held by phone. Stakeholders were identified by the local government staff and represented a variety of viewpoints

including housing, affordable housing, community development and planning, education, employment, homelessness, people with disabilities, and others.

Interview invitations were made by email and/or phone to a list of stakeholders compiled by the project team with input from City staff. Eight people participated in an interview, and many other invitees participated in other ways, such as by attending a public meeting or taking the community survey. Organizations from which one or more representatives participated in the development of this AI include:

- City of Chino Hills Community Services Department
- City of Chino Hills Community Development Department
- City of Chino Housing Division
- City of Chino Human Services Department
- San Bernardino County
- Inland Fair Housing and Mediation Board
- Inland Regional Center
- Heart2Serve
- Pomona Valley Habitat for Humanity
- Jamboree Housing Corp.

Community Survey

Another method for obtaining community input was a 25-question survey available to the general public, including people living or working in the Chino Hills region and other stakeholders. The survey was available online and in hard copy from June to November 2019. Paper copies were available at the public meetings and other related events held throughout the study area. A total of 418 survey responses were received.

Public Comment Period and Hearing

The City of Chino Hills held a public comment period from March 30 to May 11, 2020. A public hearing for the Analysis of Impediments to Fair Housing Choice was held on May 12, 2020 and was continued on June 9, 2020. During this time, copies of the draft report were made available for public inspection. Residents and other stakeholders were invited to provide written comments by email, mail, or hand delivery to the City of Chino Hills Community Services Department. No comments were received during the comment period or at the public hearings.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. Notice was given to residents through a public notice in the Chino Champion, on the city's website (<https://www.chinohills.org/1231/CDBG>), through a press release distributed to local news outlets, and through flyers placed at public counters. In all meeting advertisements, information for anyone needing special accommodations was provided, but none were requested.

Community Engagement Results⁴

A total of 431 people participated in the community engagement process used to develop this AI. Eight participated in interviews, five attended a public meeting, and 418 responded to the survey.

Public Meeting

1. What are the greatest fair housing needs in the community?

- There is a need for low-income, workforce housing. Affordable housing is a huge need.
- People have to live far away from their jobs to afford housing.
- Homeownership is expensive in the area.
- Rent is expensive in the area. It is skyrocketing.
- Homelessness as a problem is growing. There is a need for homeless shelters, group homes, and transitional living homes.
- There is a need for 3D printed homes for disaster recovery.

2. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

- The City has resources to resolve fair housing issues - Inland Fair Housing and Mediation Board.
- There is a need for conflict resolution and dispute resolution services with a translator for residents with Limited English Proficiency.

3. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?

- Los Serranos is a lower-income area that has received a lot of grant money for sidewalks and streets. It is an older part of the city that needs investment in infrastructure. The City is really working to improve the Los Serranos area.
- There is a need to provide assistance with internet access for low-income families so that children have access.

Stakeholder Interviews

1. What parts of Chino Hills are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?

- All of Chino Hills is considered desirable. It is safe and has a varied housing stock. The flip side is that the price of living is higher than surrounding areas.
- Affordability is the main barrier. Discrimination is not common.
- Government officials understand the need for affordable housing, but the public may have some confusion between affordability and Section 8 housing. More education is needed.
- Ivy Park in City of Chino had a lot of low-income apartments. The developer partnered with City of Chino and many families were able to get apartments there through case management.

- There is a high level of expense. Off of Pipeline, near Los Serarnos area, the crime is a little higher, but the newer housing there is in the \$500,000 - \$600,000 range. Those in need are generally forced out.
 - The city's transit system hits the main streets in Chino Hills and Chino. It hits the main commercial areas and schools. There are no impediments to moving to these areas.
- 2. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?**
- There is not a broad enough spectrum of affordability. Any economic mobility is limited because rents are so high. Even people with good jobs have difficulty affording housing.
 - Chino Hills is a mixed community from a racial and ethnic perspective. The city is a broad community. Do not see discrimination.
 - The city has limited bus and does not have rail. The funding for bus service in the area is declining.
 - Most people commute outside of the city so that creates traffic on regional connections. Residents need access to a vehicle if employment is outside of the city.
 - No. Income is the greatest barrier.
 - No, not aware of any barriers outside of economic barriers. It would be nice to have some affordable housing.
 - No housing discrimination.
- 3. Are people in the area segregated in where they live? What causes this segregation to occur?**
- There is some segregation, but most neighborhoods have a mix. Los Serranos is predominantly Hispanic, but there is still a mix. They lack African American representation.
 - No.
 - Don't believe it's segregated. It's a very mixed community.
- 4. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?**
- Inland Fair Housing has fair housing and tenant resources. They have good coordination. They do workshops. They come into city hall, senior centers, go to events, to make people aware of what they offer, and they advertise on cable networks.
 - I know we have them and believe they are connected.
 - I don't know. I just send people to the community services desk at the City or call 211. This is another thing that would be good in the one-stop shop.
- 5. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?**
- Yes. The schools are ranked high academically. People try to live in the City of Chino Hills for the school system.
 - Yes they are.

- Schools are great. Roads are good.
- Yes.

6. Is there anything we haven't discussed that you feel is important to our research?

- We are on the right path of looking at the whole bigger picture.

Community Survey

The following provides an overview of key questions and responses from the community survey. Complete results are provided as an appendix to this report.

1. Participant Demographics

- Almost all of the 418 respondents who participated in the survey (98 percent) are residents of the City of Chino Hills. Respondents living outside of Chino Hills include residents of surrounding communities and employees of nonprofits working in the region.
- Most respondents are between the ages of 35 and 74. 22 percent are between the ages of 35 and 44; 27 percent are between the ages of 45 and 54; 18 percent are between the ages of 55 and 61; and 21 percent are between the ages of 62 and 74. About 2 percent of respondents are between the ages of 18 and 24, and 2 percent are aged 75 and above.
- About 3 percent of survey takers have incomes below \$25,000, and about 9 percent have incomes from \$25,000 to \$49,999. The \$50,000 to \$74,999 bracket includes 11 percent of respondents, and a substantial share (about 78 percent) have incomes of \$75,000 or more.
- About half (51 percent) of participants are White, and about one in five (21 percent) are Hispanic. 16 percent are Asian or Pacific Islander. People of multiple races constitute 7 percent of respondents; people of other races make up 4%; African American/ Black respondents, 4 percent; and Native American or Alaska Native respondents, 2 percent.
- Of the 418 respondents, 24 percent regularly speak a language other than English at home. Spanish is the most common other language spoken.
- Disabilities affect a considerable share of survey takers. About 16 percent of respondents have someone in their home who has a disability.
- About 86 percent of respondents are homeowners, and about 10 percent are renters. About 4 percent live with a relative.

2. Respondents' Thoughts about Community Needs

- The most common public improvements that survey takers would like to see in their neighborhoods are street, road, and sidewalk improvements; community parks, gyms, and recreational fields; and public safety offices (fire, police, emergency management). Several participants also mentioned the need for public improvements, such as sidewalks and lighting, in the Los Serranos area in particular.

- When asked about the greatest housing needs in Chino Hills, energy efficiency improvements to housing was the most common response; about 34 percent of respondents rated these improvements as a high need in the city. Elderly or senior housing, help for homeowners to make housing improvements, and help buying a home/ downpayment assistance were other popular selections.

3. Respondents' Thoughts about Fair Housing

- More than one-half of survey participants (52 percent) report understanding their fair housing rights, and 33 percent somewhat understand their fair housing rights. Only 16 percent do not know their fair housing rights, although 43 percent of residents reported that they would not know where to file a housing discrimination complaint.
- 13 respondents (4 percent) report that they experienced housing discrimination since living in the area. In the majority of cases (64 percent), the discrimination was by a landlord or property manager. The most common basis for discrimination was race (92 percent of cases), followed by ethnicity (38 percent), disability (23 percent), and familial status (23 percent). None of the participants who faced housing discrimination reported it, most commonly because they didn't know what good it would do or didn't know where to file.
- Survey participants were asked whether they think housing discrimination is an issue in Chino Hills. About 9 percent of respondents said housing discrimination is an issue, and 14 percent said housing discrimination is somewhat of an issue. About 54 percent said housing discrimination is not an issue, and 22 percent don't know whether it is.
- Asked to select any factors that are barriers to fair housing in Chino Hills, survey participants most commonly identified the following impediments:
 - Not enough affordable rental housing for seniors (selected by 48 percent of respondents);
 - Displacement of residents due to rising housing costs (selected by 45 percent of respondents);
 - Not enough affordable housing for families (selected by 44 percent of respondents);
 - Community opposition to affordable housing (selected by 38 percent of respondents); and
 - Not enough affordable housing for individuals (selected by 34 percent of respondents).
- The majority of respondents think services such as garbage collection, banking and lending, parks and trails, fire and police protection, schools, and grocery stores are evenly provided throughout Chino Hills. Conversely, less than half of survey takers said that property maintenance, bus service, and roads and sidewalks are evenly provided throughout the city.

Public Hearing

The City held a public comment period from March 30 to May 11, 2020. A public hearing for the Analysis of Impediments to Fair Housing Choice was held on May 12, 2020 and was continued on June 9, 2020. During this time, copies of the draft report were made available for public inspection. Residents and other stakeholders were invited to provide written comments by email, mail, or hand delivery to the City of Chino Hills Community Services Department. No comments were received during the comment period or at the public hearings.

CHAPTER 3.

SOCIOECONOMIC PROFILE

Demographic Profile

Chino Hills' population is estimated at 78,025, according to 2017 Annual Estimates from the U.S. Census. The city's population increased 4% from 74,799 in 2010. The most recent data available, from the State of California Department of Finance, estimates the city's population at 82,409 as of January 2020.³

Race and Ethnicity

White residents in Chino Hills made up 33.4% of the city's population in 2010, as shown in Table 1. While the number of White residents remained relatively steady between 1990 and 2010 at around 25,000, there was an overall decrease in the White population share from 43.8% in 2000 and 64.3% in 1990. Most other population groups saw an increase in both number and population share over those decades. The city's Hispanic population increased nearly threefold, with Hispanic residents comprising 29.2% of the population in 2010, up from 25.9% in 2000 and 19.8% in 1990.

Chino Hills' Asian population grew significantly from 1990 to 2010, increasing by more than 400% to reach about 24,000. In 2010, the Asian population surpassed the Hispanic population as the city's second largest racial or ethnic group, with a population share of 31.8%, up from 23.3% in 2000 and 10.9% in 1990. The city's Black population increased in both number and share between 1990 and 2000, adding 2,178 residents and 1.5 percentage points. This growth leveled off over the next decade, with the number of Black residents declining slightly and the population share decreasing to 4.9%. The Native American population saw a similar pattern, with number and population share increasing between 1990 and 2000 and decreasing in the subsequent decade to reach about 300 residents, or 0.4% of Chino Hills' population, in 2010.

Similar trends in race and ethnicity occur in the wider Riverside-San Bernardino-Ontario MSA (Metropolitan Statistical Area), which includes San Bernardino and Riverside Counties. The White population share has experienced a steady decline in the region, from 62.4% in 1990 to 36.6% in 2010. Conversely, Hispanic residents made up the largest share of the region in 2010, increasing from 26.5% in 1990 to 47.3% in 2010. The Asian and Black populations also showed an increase, with Black residents comprising 8.0% of the region up from 6.5% in 1990, and Asian residents comprising 7.1% of the region, up from 3.6%. The Native American population remained around 1% of the total population from 2000 to 2010.

National Origin

The foreign-born share of the population in Chino Hills nearly doubled between 1990 (14.6%) and 2010 (26.7%). The number of foreign-born residents more than doubled, increasing by about 540,000 people

³ State of California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark. Retrieved from: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/>

or 150% over the two decades. Growth of the foreign-born population in the city outpaced the rate in the region, which increased from 13.9% to 21.4% over the same time period.

The top three countries of origin among foreign-born residents in Chino Hills are the Philippines, Mexico and Taiwan. Filipino and Mexican residents each make up nearly one-fifth (19%) of the foreign-born population. Other countries from which a significant share of the foreign-born population originate include China, Korea, India, Vietnam, Indonesia, Hong Kong, and Thailand.

Limited English Proficiency

The limited English proficiency (LEP) population comprises 11.6% of Chino Hills' population. The top languages spoken by the LEP population are Chinese, Spanish, Korean and Tagalog. Chinese-speaking LEP residents comprise 39.3% of the LEP population, while Spanish-speaking LEP residents comprise 37.6% of the LEP population. Nearly 15% of LEP residents speak Korean. All other languages each account for less than 9% of the LEP population.

Disability

The population with disabilities in Chino Hills accounts for 6.6% of the total population, which is less than population with disabilities in the MSA (10.3%). All disability types (ambulatory, vision, cognitive, ambulatory, self-care and independent living) occur at greater rates in the MSA than within the City of Chino Hills. The most common disability type in Chino Hills is ambulatory difficulty, which affects 3.7% of city residents. Independent living difficulties are the next most common disabilities, affecting 3.3% of the population, followed by cognitive difficulties (2.6%). Hearing and self-care difficulties affect 1.9% of the population. Vision difficulties affect the smallest percentage of residents in the city (0.9%) and in the MSA (2.2%).

Age

Age distribution in Chino Hills resembles the Riverside-San Bernardino-Ontario MSA. The population between the ages of 18 and 64 comprise the majority of Chino Hills residents (65.9%). Minors under 18 comprise over one-quarter (27.1%), while seniors make up 7.0%. Between 2000 and 2010, the share of minors in Chino Hills decreased from 33.6% to 27.1%. Over the same time period, the adult population increased from 62.4% to 65.9% and seniors increased from 3.9% to 7.0% indicating an aging population. This trend also occurred in the MSA between 2000 and 2010; the population under 18 decreased from 32.1% to 28.8% and the 18-64 population increased from 57.5% to 60.8%.

Sex

Gender distribution has remained static in Chino Hills since 1990. As of 2010, the population showed a 1% difference with a female population share of 50.6% and a male population share of 49.4%. The gender distribution of the population residing in the Riverside-San Bernardino-Ontario MSA also shows a slightly larger share of females (50.3%) than males (49.7%) between 1990 and 2010, up from a 50% split.

Family Type

Families with children account for 52.6% of all families that reside in Chino Hills. The number of families with children declined by 10 percentage points between 2000 and 2010, from 63.4% to 52.6%. The share

of families with children also declined in the region during this period, from 55% to 51%. The declining number of families with children also reflects the region's aging population over this period.

TABLE 1 – DEMOGRAPHIC OVERVIEW

Demographic Indicator	City of Chino Hills			Riverside-San Bernardino-Ontario Region		
		#	%		#	%
Race/Ethnicity						
Non-Hispanic						
White		24,947	33.4%		1,546,666	36.6%
Black		3,226	4.3%		301,523	7.1%
Asian or Pacific Islander		22,462	30.0%		261,593	6.2%
Native American		142	0.2%		19,454	0.5%
Two or More Races		1,982	2.7%		91,476	2.2%
Other		184	0.3%		7,737	0.2%
Hispanic		21,856	29.2%		1,996,402	47.3%
National Origin						
#1 country of origin	Philippines	3,847	5.4%	Mexico	553,493	14.0%
#2 country of origin	Mexico	3,798	5.3%	Philippines	62,019	1.6%
#3 country of origin	Taiwan	2,250	3.2%	El Salvador	30,455	0.8%
#4 country of origin	China*	2,004	2.8%	Guatemala	19,549	0.5%
#5 country of origin	Korea	1,978	2.8%	Vietnam	19,525	0.5%
#6 country of origin	India	1,125	1.6%	Korea	18,565	0.5%
#7 country of origin	Vietnam	645	0.9%	India	15,522	0.4%
#8 country of origin	Indonesia	454	0.6%	Canada	14,763	0.4%
#9 country of origin	Hong Kong	348	0.5%	China*	14,055	0.4%
#10 country of origin	Thailand	244	0.3%	Taiwan	9,245	0.2%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Chinese	3,403	4.8%	Spanish	533,544	13.5%
#2 LEP Language	Spanish	3,253	4.6%	Chinese	20,495	0.5%
#3 LEP Language	Korean	1,276	1.8%	Tagalog	16,986	0.4%
#4 LEP Language	Tagalog	734	1.0%	Vietnamese	12,570	0.3%

* Excluding Hong Kong and Taiwan.

TABLE 1 – DEMOGRAPHIC OVERVIEW (CONTINUED)

Demographic Indicator	City of Chino Hills			Riverside-San Bernardino-Ontario Region		
		#	%		#	%
Limited English Proficiency (LEP) Language (continued)						
#5 LEP Language	Vietnamese	274	0.4%	Korean	11,883	0.3%
#6 LEP Language	Gujarati	246	0.4%	Arabic	6,835	0.2%
#7 LEP Language	Arabic	166	0.2%	Other Pacific Island	5,360	0.1%
#8 LEP Language	Other Pacific Island	153	0.2%	Other Indic language	3,125	0.1%
#9 LEP Language	Japanese	84	0.1%	Cambodian	3,117	0.1%
#10 LEP Language	Other Indic	74	0.1%	Thai	2,576	0.1%
Disability Type						
Hearing difficulty		1,318	1.9%		125,033	3.2%
Vision difficulty		636	0.9%		86,934	2.2%
Cognitive difficulty		1,862	2.6%		170,114	4.4%
Ambulatory difficulty		2,624	3.7%		241,262	6.2%
Self-care difficulty		1,319	1.9%		102,841	2.6%
Independent living difficulty		2,326	3.3%		170,490	4.4%
Sex						
Male		36,979	49.4%		2,101,083	49.7%
Female		37,820	50.6%		2,123,768	50.3%
Age						
Under 18		20,302	27.1%		1,214,696	28.8%
18-64		49,267	65.9%		2,570,221	60.8%
65+		5,230	7.0%		439,934	10.4%
Family Type						
Families with children		10,148	52.6%		500,062	51.0%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and county levels may not be the same and are thus labeled separately.

Data Sources: Decennial Census; ACS

TABLE 2 – DEMOGRAPHIC TRENDS

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
City of Chino Hills						
Race/Ethnicity						
White, Non-Hispanic	24,939	64.3%	29,349	43.8%	24,947	33.4%
Black, Non-Hispanic	1,676	4.3%	3,854	5.8%	3,643	4.9%
Hispanic	7,682	19.8%	17,343	25.9%	21,856	29.2%
Asian or Pacific Islander, Non-Hispanic	4,238	10.9%	15,644	23.3%	23,810	31.8%
Native American, Non-Hispanic	151	0.4%	374	0.6%	303	0.4%
National Origin						
Foreign-born	5,691	14.6	15,266	22.8	19,989	26.7
Limited English Proficiency						
Limited English proficiency	2,696	6.9	7,779	11.6	8,657	11.6
Sex						
Male	19,999	51.4	33,498	50.0	36,979	49.4%
Female	18,931	48.6	33,555	50.0	37,820	50.6%
Age						
Under 18	12,512	32.1	22,549	33.6	20,302	27.1%
18-64	25,132	64.6	41,865	62.4	49,267	65.9%
65+	1,286	3.3	2,639	3.9	5,230	7.0%
Family Type						
Families with children	6,481	62.2	5,257	63.4	10,148	52.6%
Riverside-San Bernardino-Ontario Region						
Race/Ethnicity						
White, Non-Hispanic	1,615,830	62.4%	1,540,776	47.3%	1,546,666	36.6%
Black, Non-Hispanic	168,731	6.5%	263,322	8.1%	336,944	8.0%
Hispanic	685,672	26.5%	1,228,683	37.8%	1,996,402	47.3%
Asian or Pacific Islander, Non-Hispanic	93,331	3.6%	164,035	5.0%	298,585	7.1%
Native American, Non-Hispanic	18,007	0.7%	36,061	1.1%	36,077	0.9%
National Origin						
Foreign-born	360,666	13.9%	612,354	18.8%	904,558	21.4%
Limited English Proficiency						
Limited English proficiency	252,012	9.7%	462,538	14.2%	660,791	15.6%
Sex						
Male	1,294,274	50.0%	1,618,466	49.7%	2,101,083	49.7%
Female	1,294,518	50.0%	1,636,316	50.3%	2,123,768	50.3%

TABLE 2 – DEMOGRAPHIC TRENDS (CONTINUED)

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
Riverside-San Bernardino-Ontario Region (continued)						
Age						
Under 18	771,845	29.8%	1,044,686	32.1%	1,214,696	28.8%
18-64	1,539,215	59.5%	1,869,817	57.5%	2,570,221	60.8%
65+	277,732	10.7%	340,280	10.5%	439,934	10.4%
Family Type						
Families with children	350,701	53.6%	266,840	55.0%	500,062	51%

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

Data Sources: Decennial Census; ACS

Racially and Ethnically Concentrated Areas of Poverty

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdictions' most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁴ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁵

The City of Chino Hills currently does not have any census tracts that meet HUD's RECAP definition.

⁴ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁵ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

CHAPTER 4.

SEGREGATION AND INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

RACIAL AND ETHNIC SEGREGATION IS RELATIVELY LOW IN CHINO HILLS, WITH SOME MINOR CLUSTERING OF RACIAL AND ETHNIC GROUPS.

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices but did little to address the existing segregation and inequalities. The federal government implemented other housing policies and programs, such as Section 8 and HOPE VI, in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

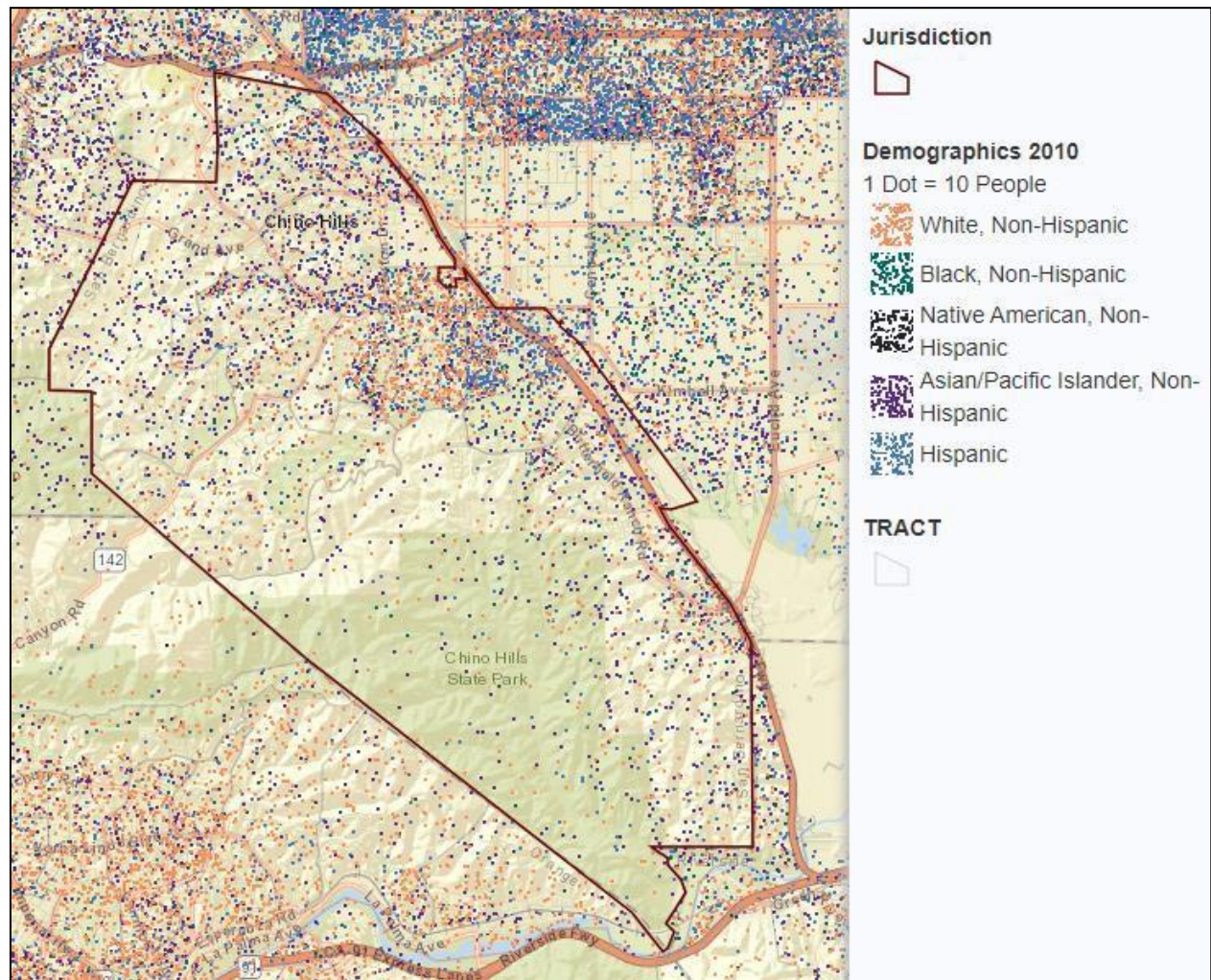
Race and Ethnicity

The northern portion of Chino Hills is the city's most densely populated area (see Figure 1). The spatial distribution of the population by race and ethnicity indicate overall low levels of segregation, as the spatial distribution patterns of racial and ethnic groups are relatively uniform throughout the city. However, maps of the city's population by race and ethnicity indicate some clustering of Hispanic residents in the Los Serranos neighborhood and a clustering of White residents in the block groups immediately west of Los Serranos (see Figure 1).

Shifts in residential patterns of racial and ethnic groups since 1990 have resulted in a more diverse population in Chino Hills, but the city remains relatively integrated by race and ethnicity. Figures 1 through 6 show a noticeable increase in the city's overall population-- and non-White populations in particular-- between 1990 and 2010. Overall residential patterns also became more concentrated in the northern portion of the city during this period. Although it is difficult to determine exact correlation between density and segregation levels from the spatial data provided, segregation among racial and ethnic groups remained consistently low as density increased in the city between 1990 and 2010 (see Figures 1-3).

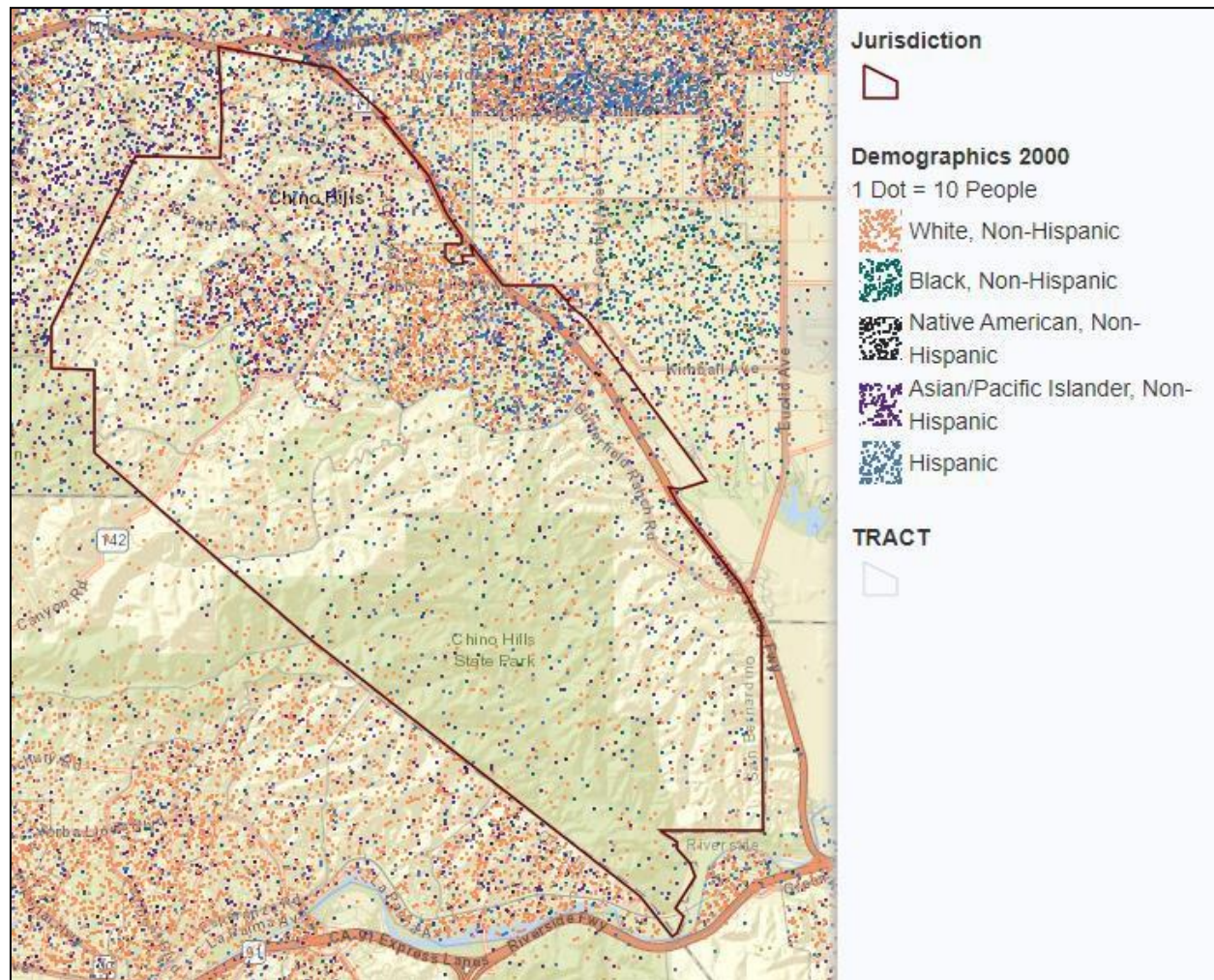
⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

FIGURE 1 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF CHINO HILLS, 2010



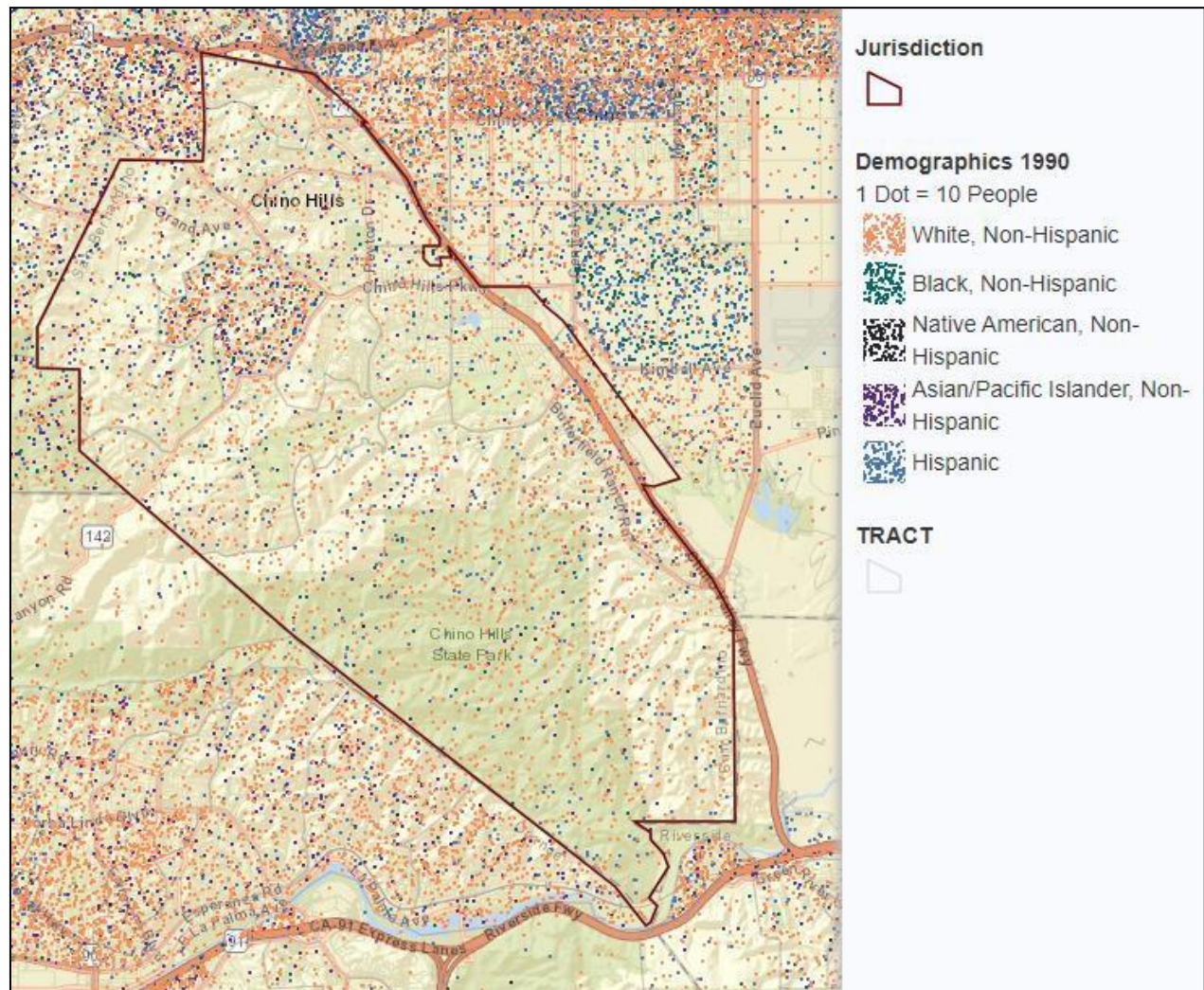
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 2 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF CHINO HILLS, 2000



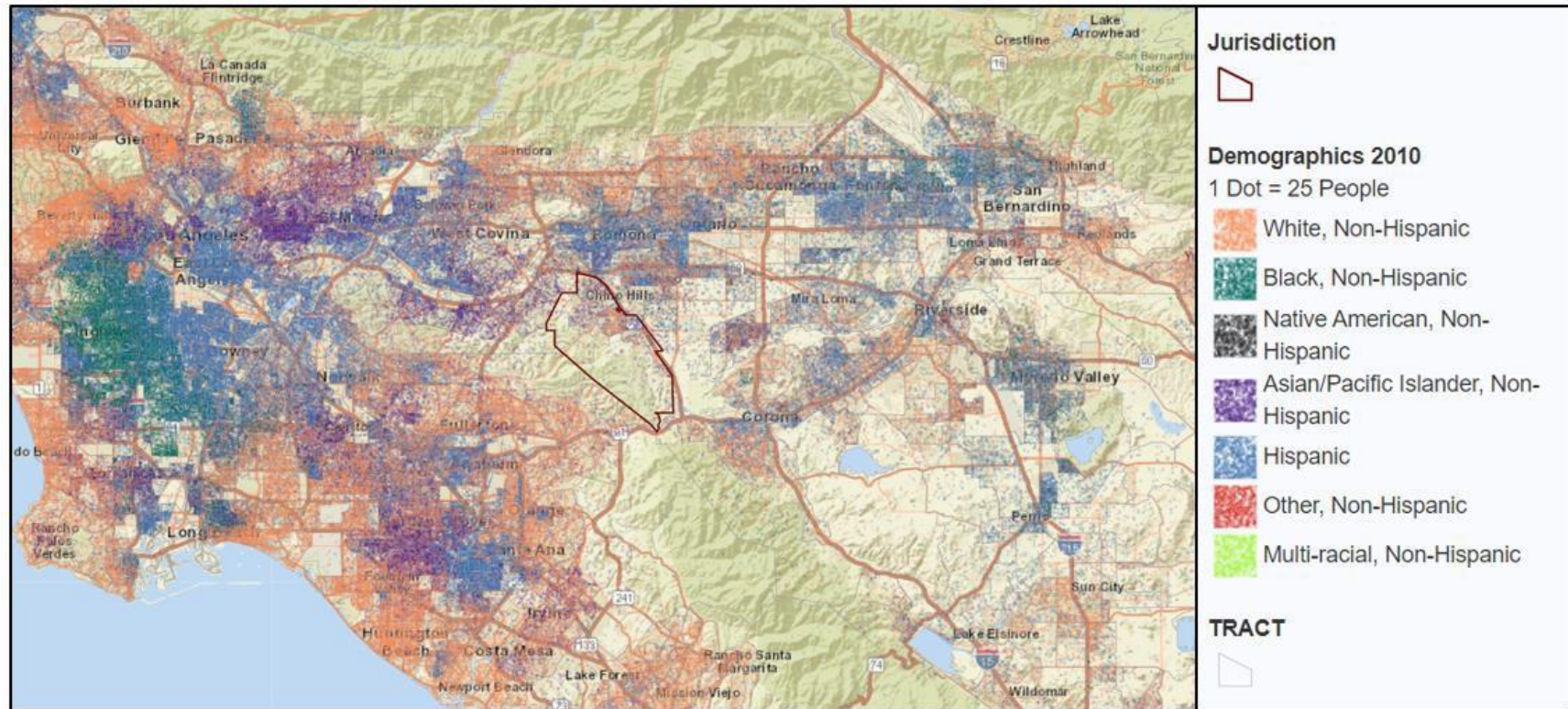
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 3 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF CHINO HILLS, 1990



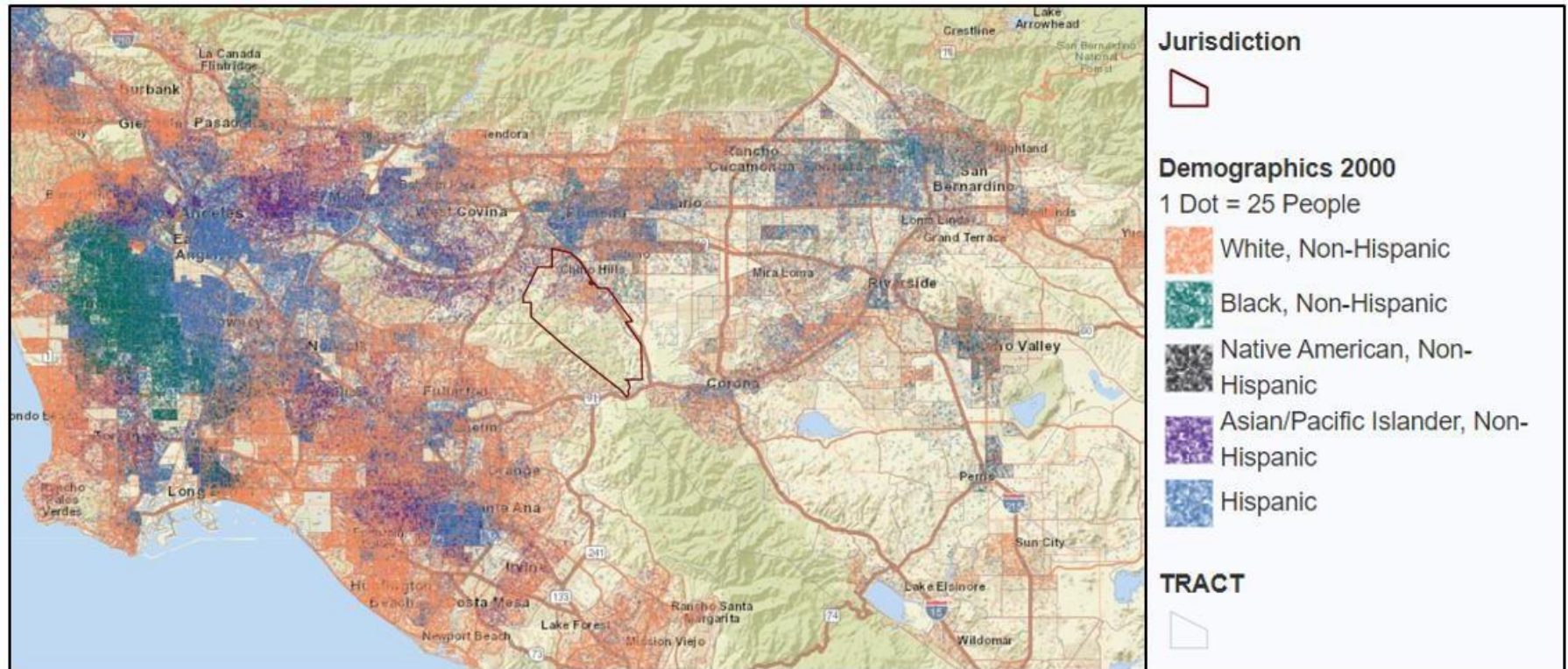
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 4 – POPULATION BY RACE AND ETHNICITY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION, 2010



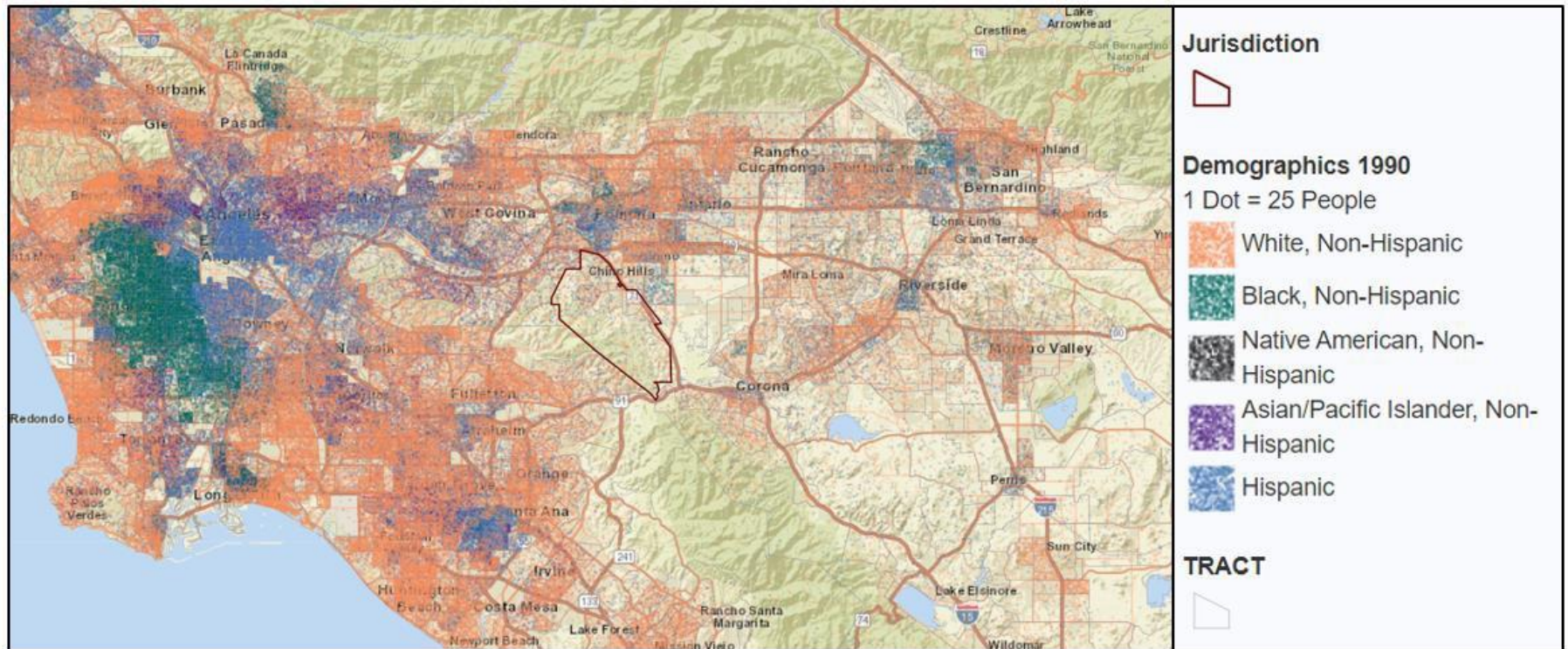
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 5 – POPULATION BY RACE AND ETHNICITY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION, 2000



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 6 – POPULATION BY RACE AND ETHNICITY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION, 1990



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Segregation Levels

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of one group that would have to change their area of residence to match the distribution of the other.

Table 3 shares the dissimilarity indices for four pairings, presenting values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The 2010 dissimilarity indices calculated for each pairing show low levels of segregation in the City of Chino Hills. The highest DI value of 24.7 was calculated for the Asian or Pacific Islander/White pairing, a decrease from low-level values calculated for 1990 and 2000. The non-White/White pairing resulted in the lowest DI value of 16.4.

Between 1990 and 2010, DI values for the Hispanic/White pairing increased significantly, while those for Black/White and Asian or Pacific Islander/White pairings decreased. Segregation of Hispanic and White populations remains low but grew by more than 15 points since 1990. The Hispanic population is also the most visibly clustered population group, with a large proportion of the population residing in and around the Los Serranos neighborhood (see Figure 7). As meeting attendees noted that this neighborhood has greater needs for public improvements, such as lighting and sidewalks, compared to other neighborhoods in the city, the clustering of the Hispanic population in the area may present fair housing concerns regarding disparities in access to opportunity by race and ethnicity.

DI values for all pairings in the Riverside-San Bernardino-Ontario region are higher compared to those in Chino Hills. In the region, DI values for Black/White and Hispanic/White pairings fall above the threshold for moderate segregation. The Black/White pairing has the highest DI of 44.0 and the Asian or Pacific Islander/White pairing has the lowest DI of 38.3. Segregation levels have increased slightly for most pairings in the region since 1990.

The regional segregation indices indicate that while Chino Hills may be relatively racially integrated at the tract level, differences between the racial and ethnic composition in the city and the region contribute to high segregation levels overall. Black and Hispanic residents make up considerably smaller shares of the population in Chino Hills (4.3% and 29.2%, respectively) than they do of the region (29.2% and 47.3%,

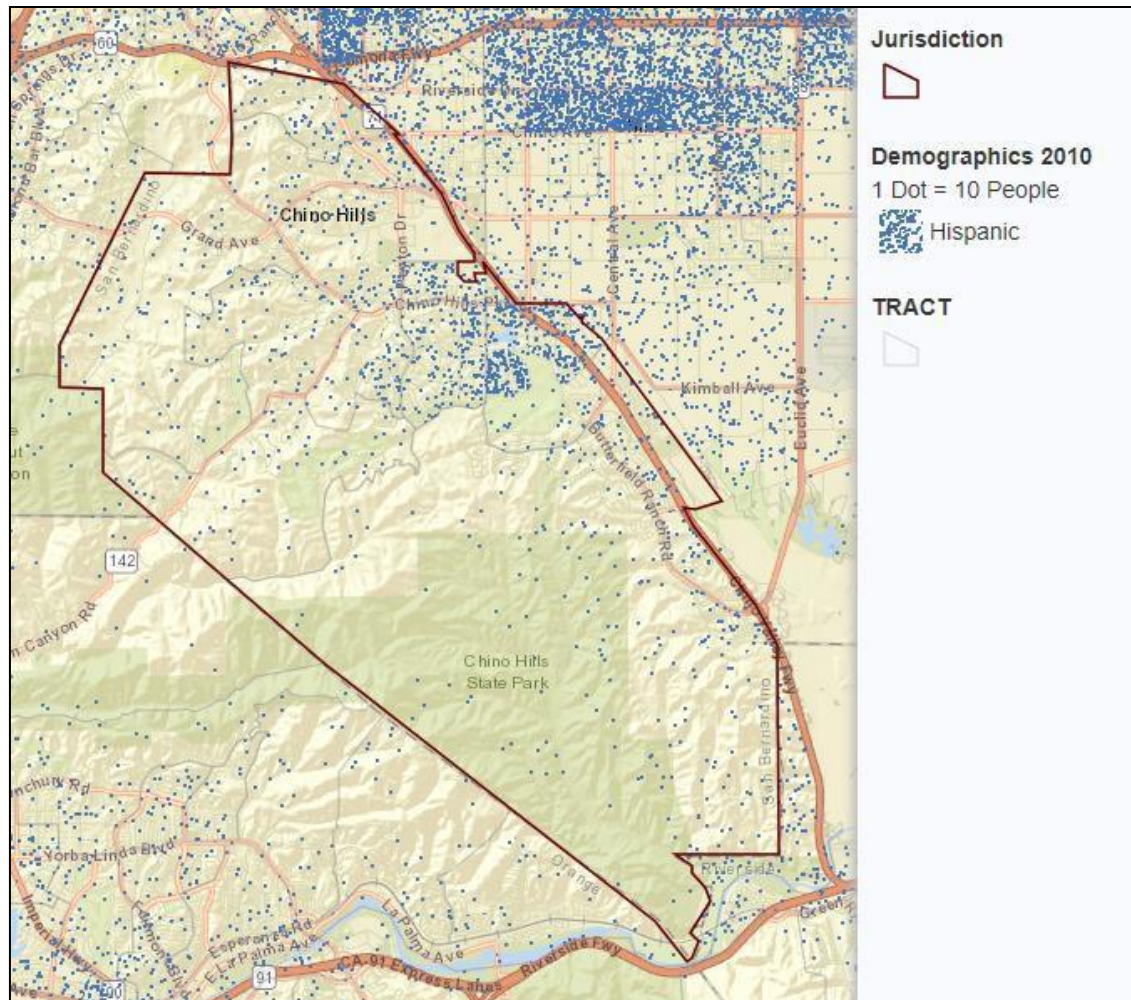
respectively). Conversely, Asian or Pacific Islander residents comprise 30.0% of the city compared to only 6.2% of the region. While these populations may have relatively similar residential patterns within the city, there are more considerable differences at the regional level.

TABLE 3 – RACIAL AND ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	City of Chino Hills			Riverside-San Bernardino-Ontario Region		
	1990	2000	2010	1990	2000	2010
Non-White/White	14.8	17.0	16.4	32.9	38.9	39.0
Black/White	22.8	18.2	18.0	43.7	45.5	44.0
Hispanic/White	1.3	15.3	16.6	35.6	42.4	42.4
Asian or Pacific Islander/White	36.3	31.7	24.7	33.2	37.3	38.3

Data Sources: Decennial Census

FIGURE 7 – HISPANIC POPULATION IN CHINO HILLS, 2010



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

National Origin and Limited English Proficiency Population

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁷ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁸

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.⁹ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹⁰

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

Residential patterns of foreign-born residents in Chino Hills show some spatial clustering of residents by neighborhood (see Figure 8). Residents from the Philippines, Mexico, Taiwan, China, and Korea represent the largest foreign-born populations. Residents from Mexico tend to reside in the eastern portion of the city in the Los Serranos neighborhood and surrounding areas, while residents of other national origins are more evenly dispersed throughout Chino Hills.

The geographic distribution of residents with limited English proficiency (LEP) (see Figure 9) closely resembles patterns of the foreign-born population. The most common languages of LEP populations are Chinese, Spanish, Korean, Tagalog, and Vietnamese. The most visible clustering of LEP residents is of the Spanish-speaking population in the Los Serranos neighborhood.

Meeting attendees, interviewees, and survey respondents indicated that while the City has invested in public improvements in the Los Serranos neighborhood, the need for investment persists. The clustering of foreign-born residents from Mexico and Spanish-speaking LEP populations in geographic areas of Chino

⁷ James, F., Romine, J., & Zwanig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁸ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

⁹ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹⁰ Golding, E., Goodman, L., & Strockach, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

Hills that may have less access to public improvements points to potential fair housing concerns and a need for continued investment in public improvements in the Los Serranos neighborhood.

At the regional level, there is a large population of foreign-born residents from Mexico and a large Spanish-speaking population (see Figures 10 and 11). These foreign-born and LEP populations are less present in Chino Hills, as seen on the regional maps, indicating potential barriers to this population in accessing housing in Chino Hills.

FIGURE 8 – FOREIGN-BORN POPULATION BY NATIONALITY IN THE CITY OF CHINO HILLS

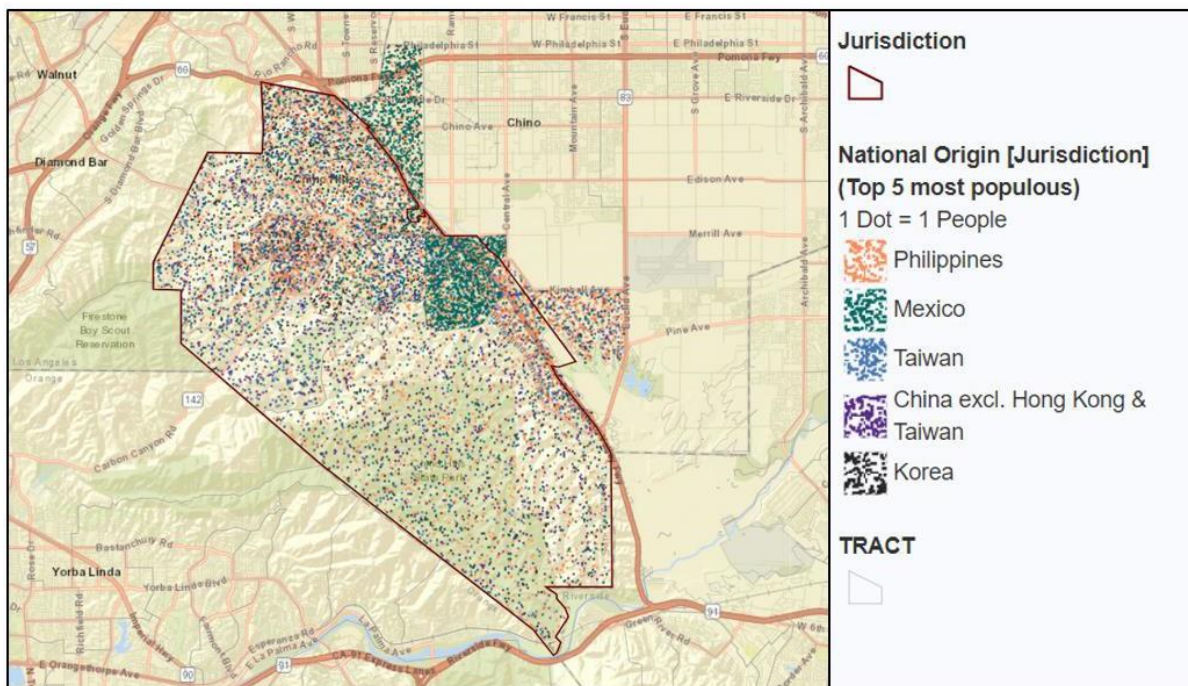
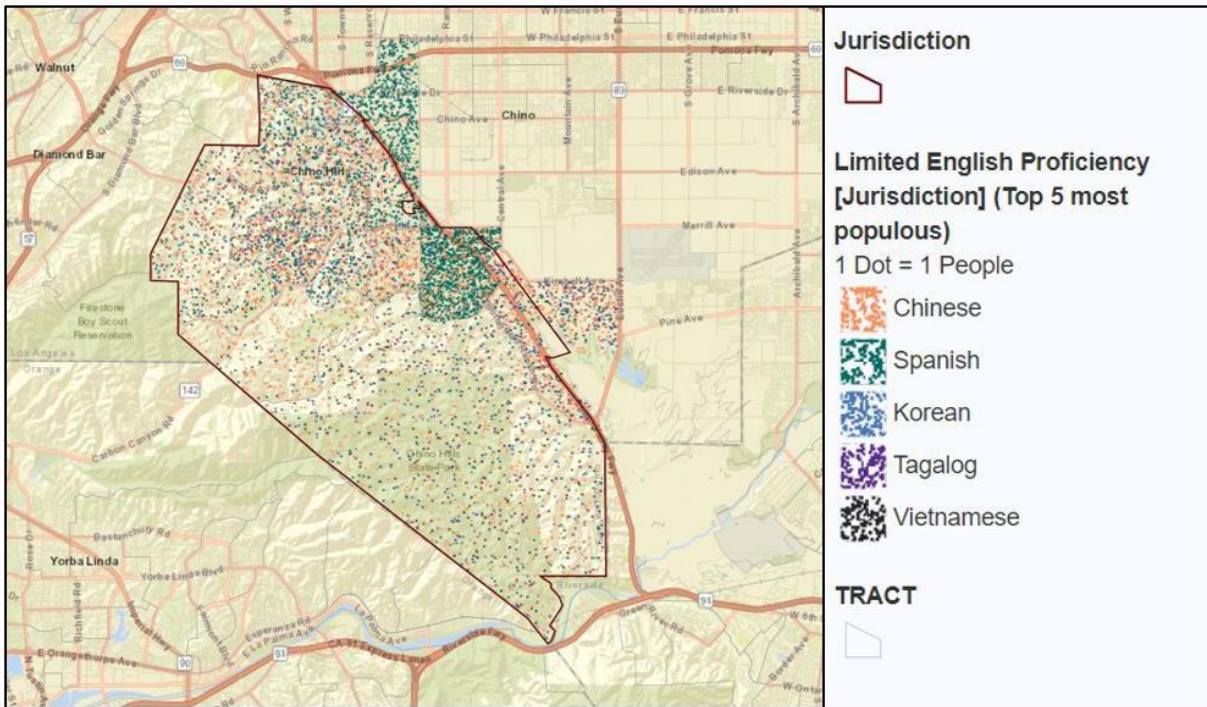
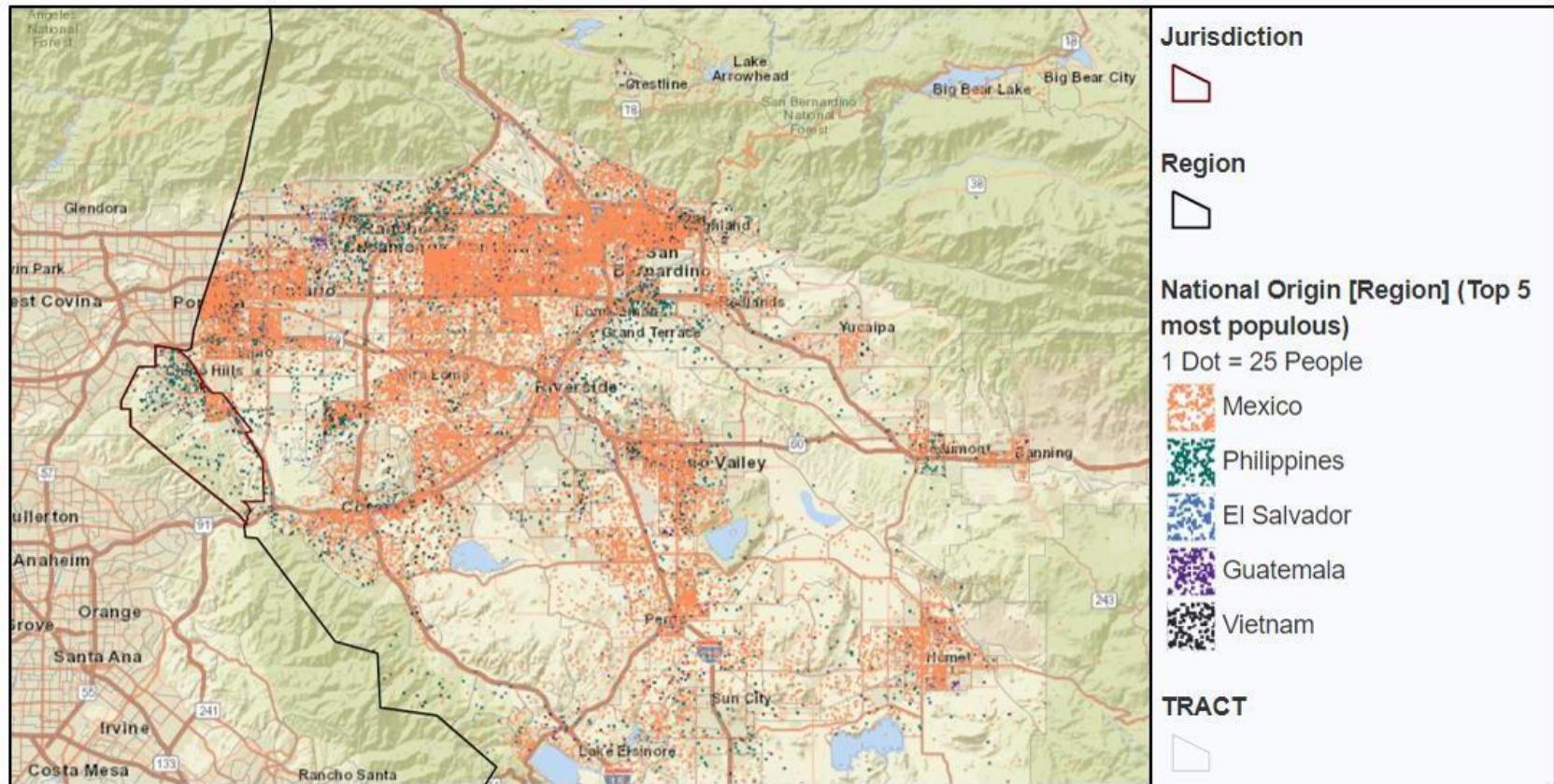


FIGURE 9 – POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITY OF CHINO HILLS



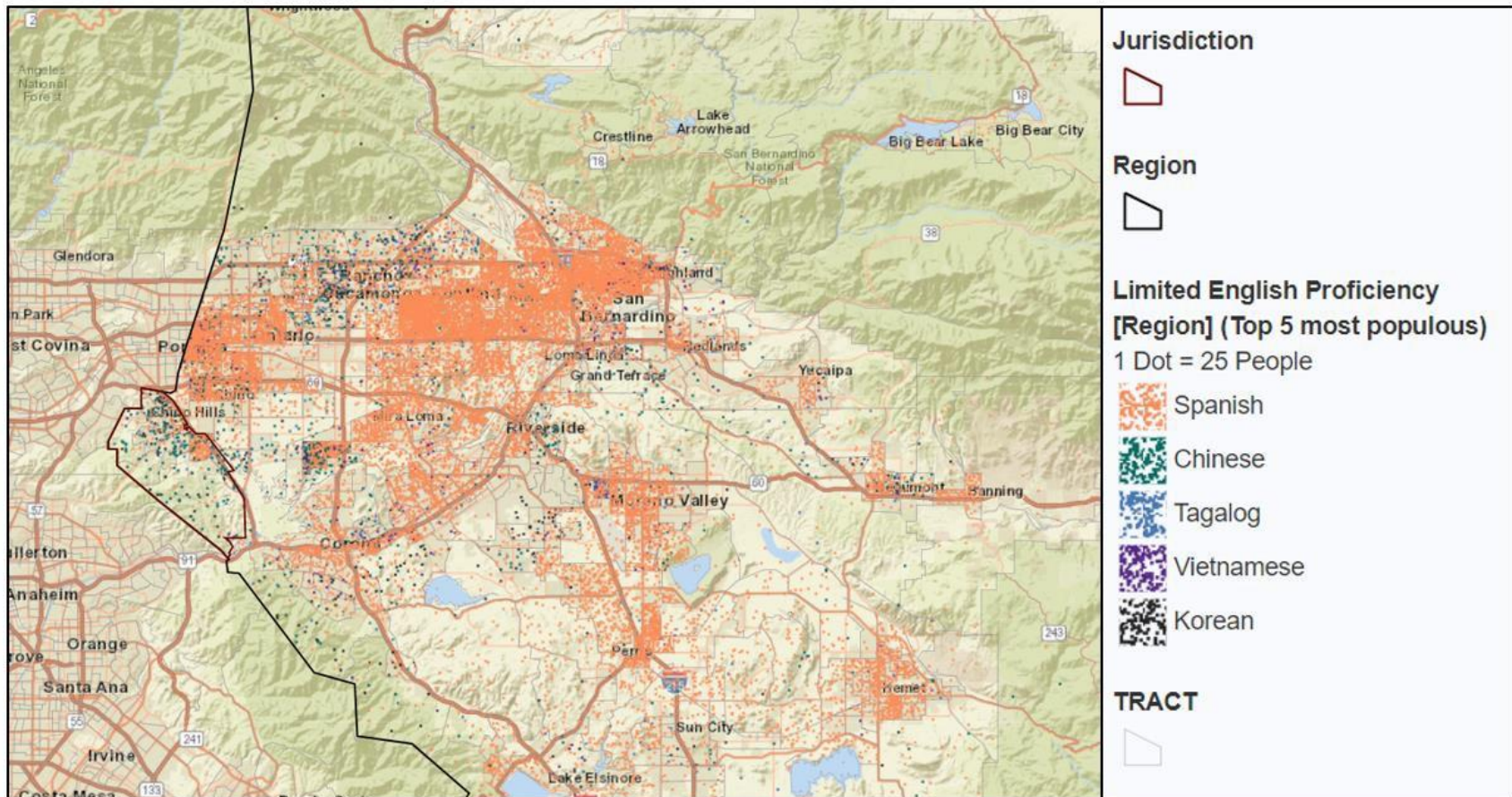
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 10 – FOREIGN-BORN POPULATION BY NATIONALITY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 11 – POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



CHAPTER 5.

ACCESS TO OPPORTUNITY

Housing discrimination and residential segregation have limited access to opportunity for specific population groups and communities. It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, research on this subject has found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while White residents, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.¹¹

Proximity is often used to indicate levels of access to opportunity; however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹² However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive with improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹³

The strategy to improve access to opportunities has been two-pronged with different housing and community development programs. Tenant-based housing vouchers allow mobility of recipients to locate in lower-poverty areas while programs like the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

¹¹ Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

¹² *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

¹³ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

Overview of HUD-Defined Opportunity Factors

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area, state, or nation. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

Average index values by race and ethnicity for the city and region are provided in Table 4 for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the White non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the White non-Hispanic group. A positive score indicates that the subgroup has a higher score than the White non-Hispanic Group.

Figures 12-24 map each of the opportunity dimensions along with demographic information such as race and ethnicity.

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITY OF CHINO HILLS AND THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic				Hispanic				
	White	Black	Asian or Pacific Islander	Native American		Black	Asian	Native American	Hispanic
City of Chino Hills – Total Population									
School Proficiency Index	79.0	82.3	83.9	77.3	78.5	3.4	4.9	-1.6	-0.5
Jobs Proximity Index	40.3	45.5	46.6	41.7	44.1	5.1	6.3	1.3	3.8
Labor Market Index	62.8	69.6	71.0	56.9	61.4	6.8	8.2	-5.9	-1.4
Transit Index	43.1	42.9	42.3	44.3	44.6	-0.2	-0.8	1.1	1.5
Low Transportation Cost Index	29.0	29.3	27.8	31.5	31.7	0.4	-1.2	2.6	2.7
Low Poverty Index	80.2	82.5	83.2	73.6	75.3	2.3	3.0	-6.6	-4.9
Environmental Health Index	23.7	24.5	24.3	21.6	22.5	0.8	0.7	-2.0	-1.2
City of Chino Hills – Population below the Poverty Line									
School Proficiency Index	75.2	65.9	79.9	-	74.6	-9.3	4.7	-75.2	-0.6
Jobs Proximity Index	36.5	77.5	54.0	-	48.9	40.9	17.5	-36.5	12.4
Labor Market Index	55.6	63.2	68.4	-	48.0	7.6	12.8	-55.6	-7.6
Transit Index	43.3	39.6	45.5	-	52.1	-3.7	2.2	-43.3	8.9
Low Transportation Cost Index	27.9	32.7	34.8	-	43.7	4.9	7.0	-27.9	15.9
Low Poverty Index	73.9	84.6	73.5	-	54.4	10.7	-0.4	-73.9	-19.6
Environmental Health Index	23.6	14.9	19.2	-	17.4	-8.7	-4.4	-23.6	-6.2

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITY OF CHINO HILLS AND THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic				Hispanic				
	White	Black	Asian or Pacific Islander	Native American		Black	Asian	Native American	Hispanic
Riverside-San Bernardino-Ontario Region – Total Population									
School Proficiency Index	50.7	41.5	56.4	40.7	38.0	-9.2	5.8	-9.9	-12.7
Jobs Proximity Index	49.5	49.7	48.3	50.2	47.8	0.2	-1.3	0.7	-1.7
Labor Market Index	34.5	27.2	43.0	25.1	24.2	-7.3	8.5	-9.4	-10.3
Transit Index	38.0	42.6	41.9	36.8	43.1	4.6	4.0	-1.1	5.2
Low Transportation Cost Index	25.8	31.8	29.2	26.3	32.7	6.1	3.4	0.6	6.9
Low Poverty Index	52.6	42.8	60.4	41.2	37.5	-9.8	7.8	-11.4	-15.1
Environmental Health Index	55.5	44.2	42.3	56.2	42.4	-11.3	-13.2	0.8	-13.1
Riverside-San Bernardino-Ontario Region – Population below the Poverty Line									
School Proficiency Index	42.4	30.8	43.1	34.4	31.1	-11.5	0.8	-8.0	-11.3
Jobs Proximity Index	50.0	49.0	51.3	52.2	49.3	-1.0	1.4	2.3	-0.6
Labor Market Index	25.6	17.4	30.5	20.6	16.4	-8.2	5.0	-4.9	-9.1
Transit Index	38.7	43.5	45.0	39.2	44.8	4.7	6.3	0.4	6.0
Low Transportation Cost Index	29.2	34.8	37.1	32.1	36.5	5.6	7.9	2.9	7.3
Low Poverty Index	38.4	27.2	42.3	30.2	23.8	-11.2	3.9	-8.2	-14.6
Environmental Health Index	56.8	44.9	39.7	50.6	42.2	-12.0	-17.1	-6.2	-14.6

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Education

School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. HUD's school proficiency index is calculated based on the performance of 4th grade students on state reading and math exams. For each block group, the index is calculated using test results in up to the three closest schools within 1.5 miles. Results are then standardized on a scale of 0 to 100 based on relative ranking within the state. A higher index score indicates greater access to high-performing elementary schools.¹⁴

SCHOOL PROFICIENCY INDEX: BASED ON 4 TH GRADE STUDENTS PERFORMANCE ON STATE READING AND MATH TESTS AT ELEMENTARY SCHOOLS IN OR NEAR EACH BLOCK GROUP

The map on the following page shows HUD-provided opportunity scores related to education for block groups within the City of Chino Hills, along with the demographic indicators of race and ethnicity. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Access to proficient schools among block groups varies somewhat throughout the city. While most tracts within the city have very high levels of access to proficient schools, there is a cluster of tracts with lower levels of access located north and west of the Los Serranos neighborhood in the northern portion of the city (see Figure 12). Overall, access to proficient schools in Chino Hills is high, particularly in the southern portion of the city, in which all block groups have school proficiency index scores above 90.

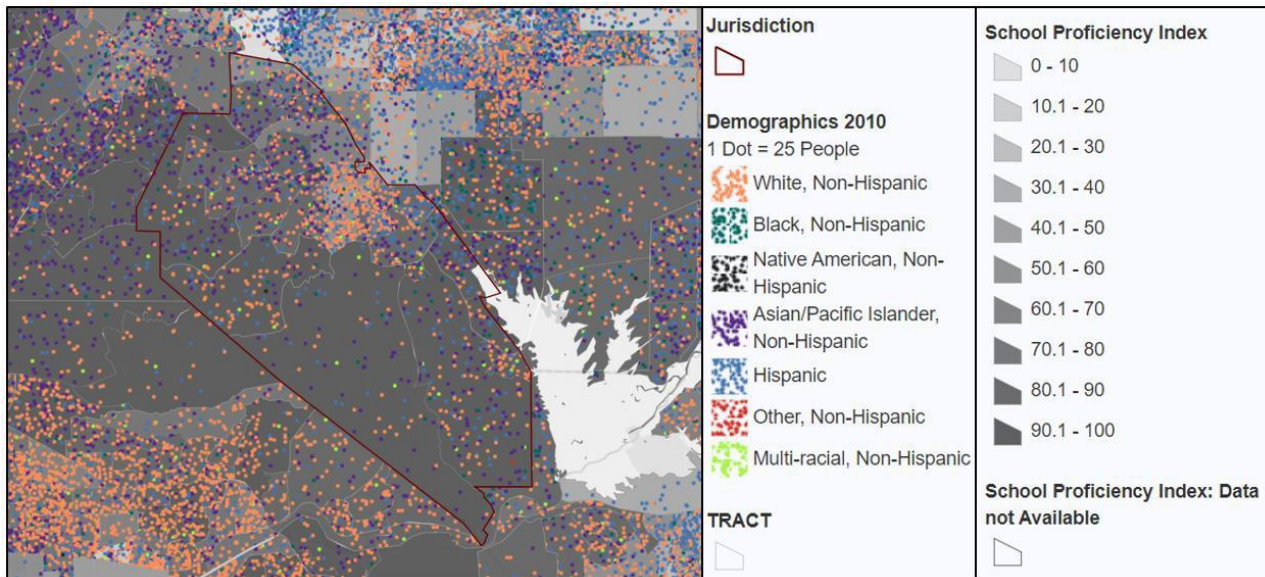
There is little visual evidence shown in Figure 12 to indicate disproportionate representation of specific racial and ethnic groups at the block group level. The opportunity dimension scores in Table 4 also indicate low levels of disparity in access to proficient schools among racial and ethnic groups in Chino Hills, as all racial and ethnic groups fall within 5 points of one another on the School Proficiency Index. The populations below the federal poverty line experience greater disparities in levels of access to proficient schools, with Black populations below the poverty line experiencing the lowest access to proficient schools.

School proficiency index scores are lower and disparities among racial and ethnic groups are greater in the San Bernardino-Riverside-Ontario metro area, in which Hispanic, Native American, and Black populations have significantly less access to proficient schools compared to White and Asian populations. Population groups below the poverty line in the region have lower access to proficient schools, with Black and Hispanic populations below the poverty line experiencing the lowest levels of access in the region.

¹⁴ HUD's data sources for its school proficiency index include attendance area zones from School Attendance Boundary Information System (SABINS) and Maponics, school proficiency data from Great Schools, and school addresses and attendance from Common Core of Data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

Results from the survey conducted as part of this planning process echoed some concern surrounding disparate access to proficient schools, with 27 percent of survey respondents noting that schools in the city are not equally provided, compared to 62 percent stating that they are equally provided.

FIGURE 12. SCHOOL PROFICIENCY INDEX IN THE N THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Employment

Neighborhoods with jobs in close proximity are often assumed to have good access to jobs. However, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs are unattainable for residents of low-income neighborhoods. Therefore, this section analyzes both the labor market engagement and jobs proximity indices which, when considered together, offer a better indication of how accessible jobs are for residents of a specific area.

JOBS PROXIMITY INDEX: BASED ON DISTANCE TO REGIONAL EMPLOYMENT CENTERS AND THE LABOR SUPPLY SERVING THOSE CENTERS

The Jobs Proximity Index measures the physical distance between place of residence and job locations, with employment centers weighted more heavily. It also takes into account the local labor supply (i.e., competition for jobs) near such employment centers. Block group results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. A higher index score indicates greater access to job locations.¹⁵ The Jobs Proximity Index scores of

block groups in the City of Chino Hills are mapped in Figure 13 along with the population distribution by race and ethnicity.

The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Block group results are standardized on a scale of 0 to 100 based on relative ranking nationally. A higher index score indicates greater labor market engagement.¹⁶ Figure 14 maps Labor Market Engagement Index scores for block groups in Chino Hills. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 13 maps the Jobs Proximity Index and shows that while most block groups in Chino Hills have relatively low proximity to jobs, several block groups bordering the City of Chino have greater jobs proximity. Figure 14 maps the Labor Market Engagement and shows moderate to high levels of engagement with the labor market in most of the city's block groups. The central portion of the city, including the Los Serranos neighborhood, displays lower levels of labor

market engagement. However, relative to the region, labor market engagement in Chino Hills tends to be

LABOR MARKET ENGAGEMENT INDEX: BASED ON EMPLOYMENT LEVELS, LABOR FORCE PARTICIPATION RATES, AND EDUCATIONAL ATTAINMENT

¹⁵ HUD's data source for its jobs proximity index includes the Longitudinal Employer-Household Dynamics (LEHD) database. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

¹⁶ HUD's data source for its labor market engagement index is the American Community Survey. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

high.

Table 4 shows patterns for both Jobs Proximity and Labor Market Engagement across racial and ethnic groups. In Chino Hills, the Asian American population has the highest score for both measures, followed by the Black population. While proximity to jobs is similar across racial groups, labor market engagement varies somewhat more among groups. In particular, Native American and Hispanic populations experience the lowest levels of labor market engagement in the city.

The population in the city living below the poverty line generally has higher levels of jobs proximity compared to the population in the city as a whole but lower levels of labor market engagement, indicating inability to access jobs due to factors other than proximity. Interviews with stakeholders in the city indicate that these factors may include lack of access to transportation and mismatches between available jobs and worker education and skillsets. Longitudinal Employer-Household Dynamics data also show that a low proportion of residents both live and work in Chino Hills (see Table 5), indicating high levels of commuting outside of the city and that access to vehicles may present barriers for many residents in accessing employment. Variations in labor market engagement across racial groups are larger for the population living below the poverty line.

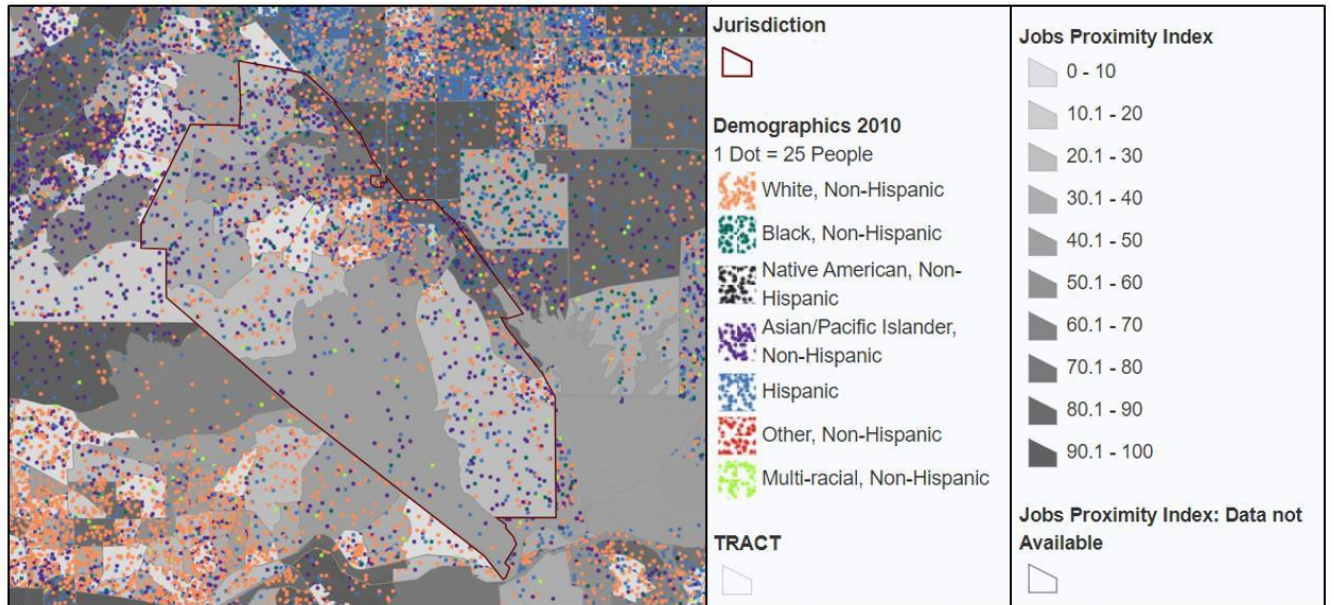
TABLE 5. INFLOW AND OUTFLOW OF WORKERS FOR PRIMARY JOBS, CHINO HILLS, 2017

Inflow and Outflow of Workers (Primary Jobs Only)	Number	Percent
Living in Chino Hills	31,497	100.0%
Living in the City but Employed Outside of the City	29,988	95.2%
Living and Employed in the City of Chino Hills	1,509	4.8%
Employed in Chino Hills	12,960	100.0%
Employed in the City but Living Outside of the City	11,451	88.4%
Employed and Living in the City of Chino Hills	1,509	11.6%

Source: Longitudinal Employer-Household Dynamics (LODES) data, 2017

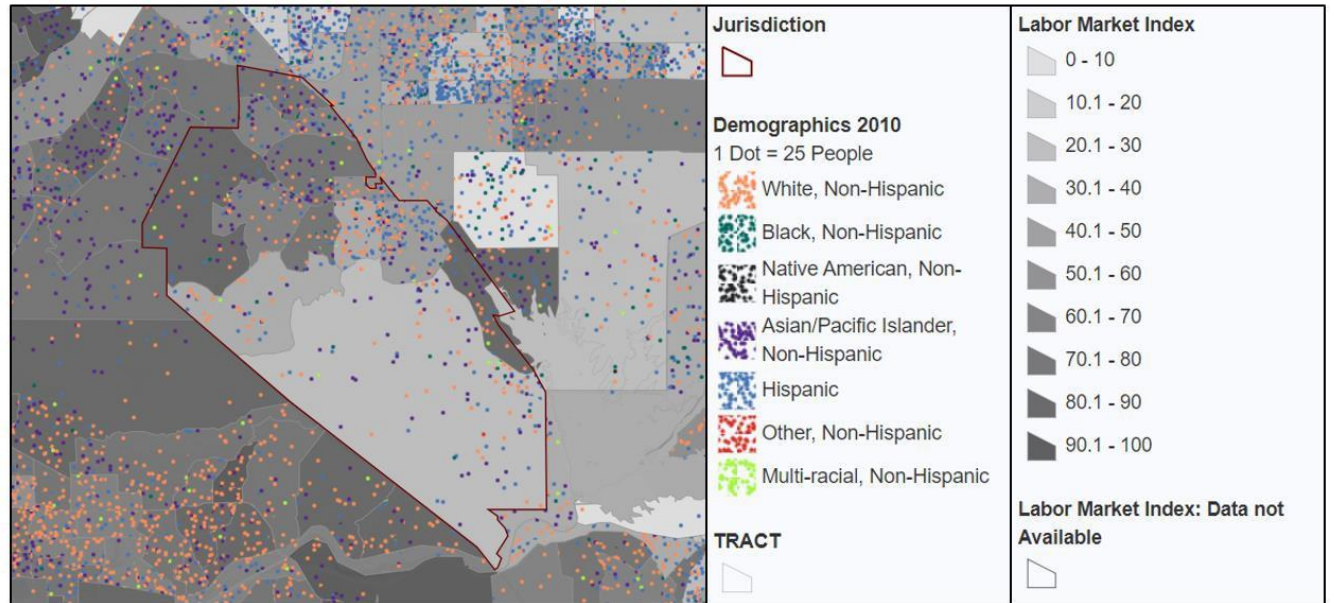
Within the Riverside-San Bernardino-Ontario metro area, jobs proximity levels are slightly higher than those in the city, with little disparity across racial groups. Scores for labor market engagement in the metro are significantly lower than those in the city across races and ethnicities.

FIGURE 13. JOBS PROXIMITY INDEX IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

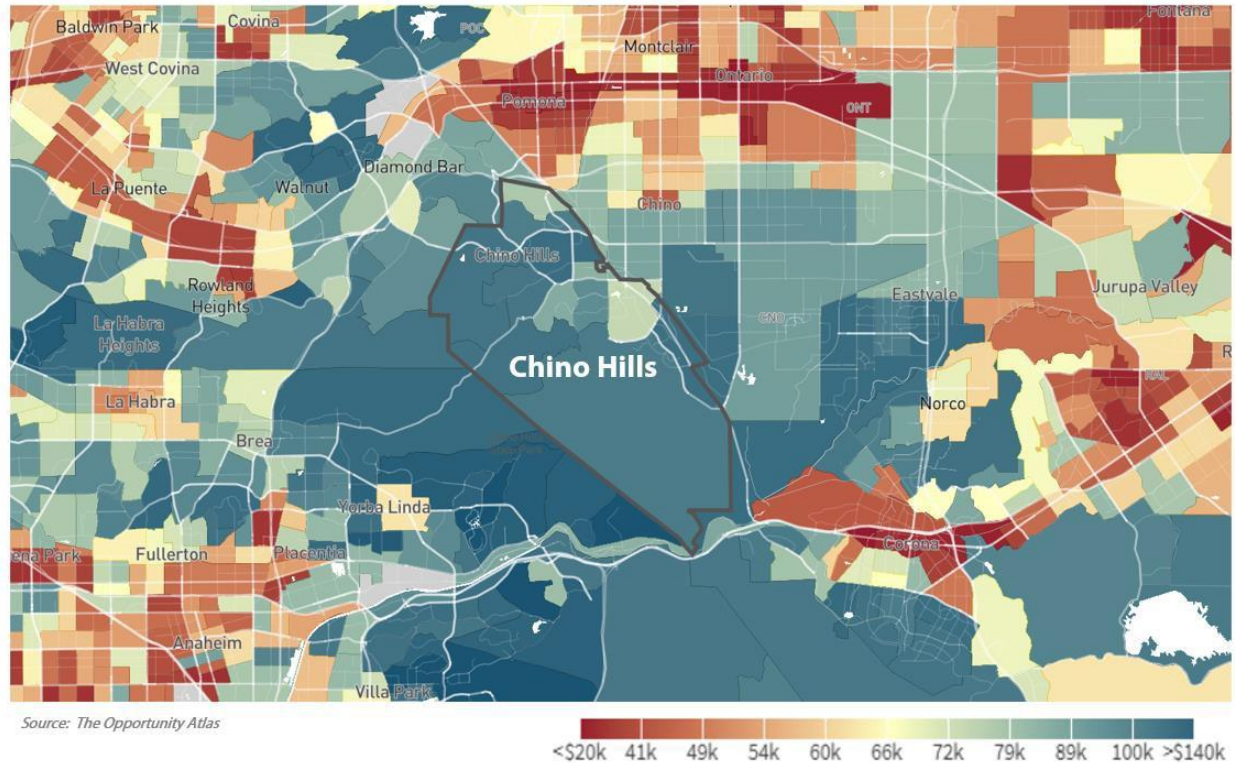
FIGURE 14. LABOR MARKET INDEX IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Median household incomes are generally high in Chino Hills and the valley relative to surrounding areas, although there is some variation by census tract (see Figure 15). While household incomes in most of the city's tracts are around \$100,000 to \$110,000, some tracts bordering the City of Chino have lower median household incomes, ranging from \$73,000 to \$83,000.

FIGURE 15. MEDIAN HOUSEHOLD INCOME IN THE CITY OF CHINO HILLS AND SURROUNDING AREAS, 2012-2016



Survey respondents ranked incentives for job creation as the second greatest economic and community development need in the city following code enforcement, with 28 percent of respondents ranking incentives for job creation as a high need and 43 percent ranking it as a moderate need.

Transportation

The Transit Trip Index measures how often low-income renter families in a neighborhood use public transit. Values are then standardized on a scale of 0 to 100 based on relative ranking nationally. The higher the index value, the more likely residents in that neighborhood use public transit.

The Low Transportation Cost Index is based on estimates of transportation costs as a percent of income for low-income renter families in a given neighborhood. Results are standardized on a scale of 0 to 100 based on relative ranking nationally. The higher the Low Transportation Cost Index, the lower the cost of transportation in that neighborhood.¹⁷ Figures 16 and 17 map Transit Trip and Low Transportation Cost Index values for Chino Hills. Lighter shading indicates areas of lower opportunity (i.e., less transit use and higher transportation costs) and darker shading indicates higher opportunity (i.e., higher transit use and lower transportation costs).

Transit usage is generally low and relatively uniform throughout most block groups in Chino Hills (see Figure 16). The highest transit usage occurs in the northern portion of the city. The lowest scoring block groups are located in the western portion of the city.

Transit Trip Index scores indicate little variation in levels of transit usage among racial and ethnic groups in Chino Hills. Compared to populations above the poverty line, transit use increases slightly for most racial and ethnic groups below the poverty line.

Transit usage is slightly lower and disparities among racial and ethnic groups slightly higher in the Riverside-San Bernardino-Ontario region relative to those in Chino Hills. Asian and Hispanic populations below the poverty line use public transportation most frequently in the region. Asian, Hispanic, and Black populations in the region have higher transit usage than White and Native American populations.

Access to low-cost transportation is low and relatively uniform throughout most block groups in Chino Hills (see Figure 17). Block groups in the northern portion of the city tend to have the highest levels of access to low-cost transportation.

As in the Transit Trips Index, there is little variation in Low Transportation Cost Index scores among racial and ethnic groups (see Table 4). Access to low-cost transportation is slightly higher for most groups living below the poverty line. Low Transportation Index scores in the Riverside-San Bernardino-Ontario are higher for Black, Asian or Pacific Islander, and Hispanic populations region but lower for White and Native

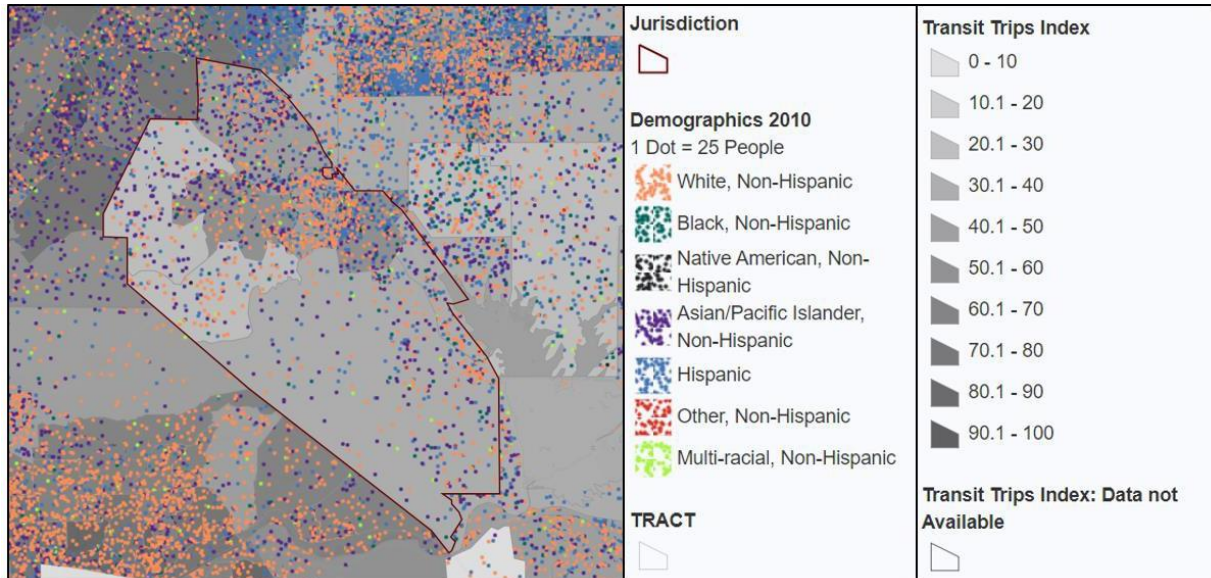
TRANSIT TRIP INDEX: BASED ON ESTIMATED NUMBER OF TRANSIT TRIPS TAKEN BY FAMILIES WITH INCOMES AT 50% OF MEDIAN INCOME FOR RENTERS IN THE REGION

LOW TRANSPORTATION COST INDEX: BASED ON TRANSPORTATION COSTS AS A SHARE OF INCOME FOR FAMILIES WITH INCOMES AT 50% OF MEDIAN INCOME FOR RENTERS IN THE REGION

¹⁷ HUD's data source for its transit trip and low transportation costs indices is Location Affordability Index (LAI) data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

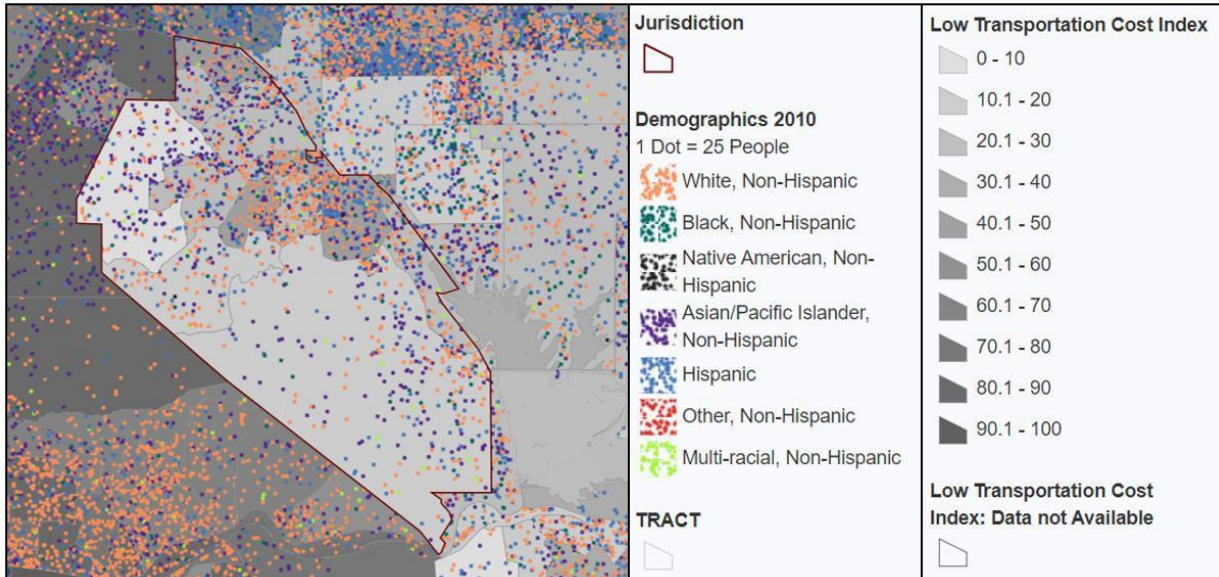
American or Alaska Native populations compared to scores in Chino Hills. Disparities among racial and ethnic groups in the Riverside-San Bernardino-Ontario region are greater than those in Chino Hills.

FIGURE 16. TRANSIT TRIPS INDEX IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 17. LOW TRANSPORTATION COST INDEX IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community.

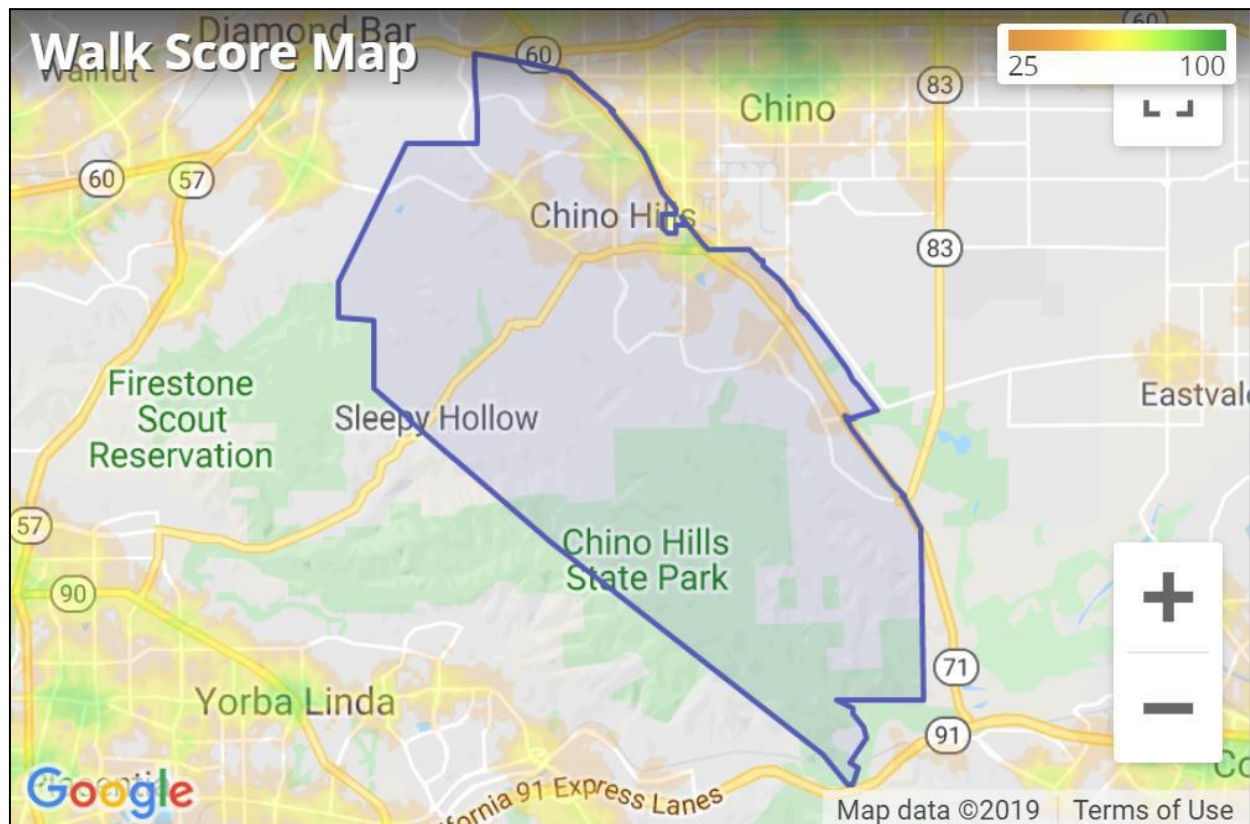
Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. While cities within the county are generally car-dependent, there is a great deal of variation in the level of walkability and access to amenities. Many of the most walkable areas with the greatest access to amenities are located in the San Bernardino Valley, including Montclair, Ontario, Colton, and Redlands (see Table 6). Low levels of walkability in Chino Hills (see Figure 18) combined with low levels of access to transit point to challenges for residents without access to vehicles in accessing needed services and amenities.

TABLE 6. WALKABILITY IN SAN BERNARDINO COUNTY CITIES

Cities in San Bernardino County	Walk Score
Crestline	58
Montclair	53
Ontario	45
Colton	40
Barstow	37
Redlands	36
Loma Linda	35
Highland	33
Chino Hills	23
Victorville	19
Yucca Valley	19
Twentynine Palms	17
Hesperia	16
Adelanto	9

Source: Walkscore, Retrieved from: <https://www.walkscore.com>

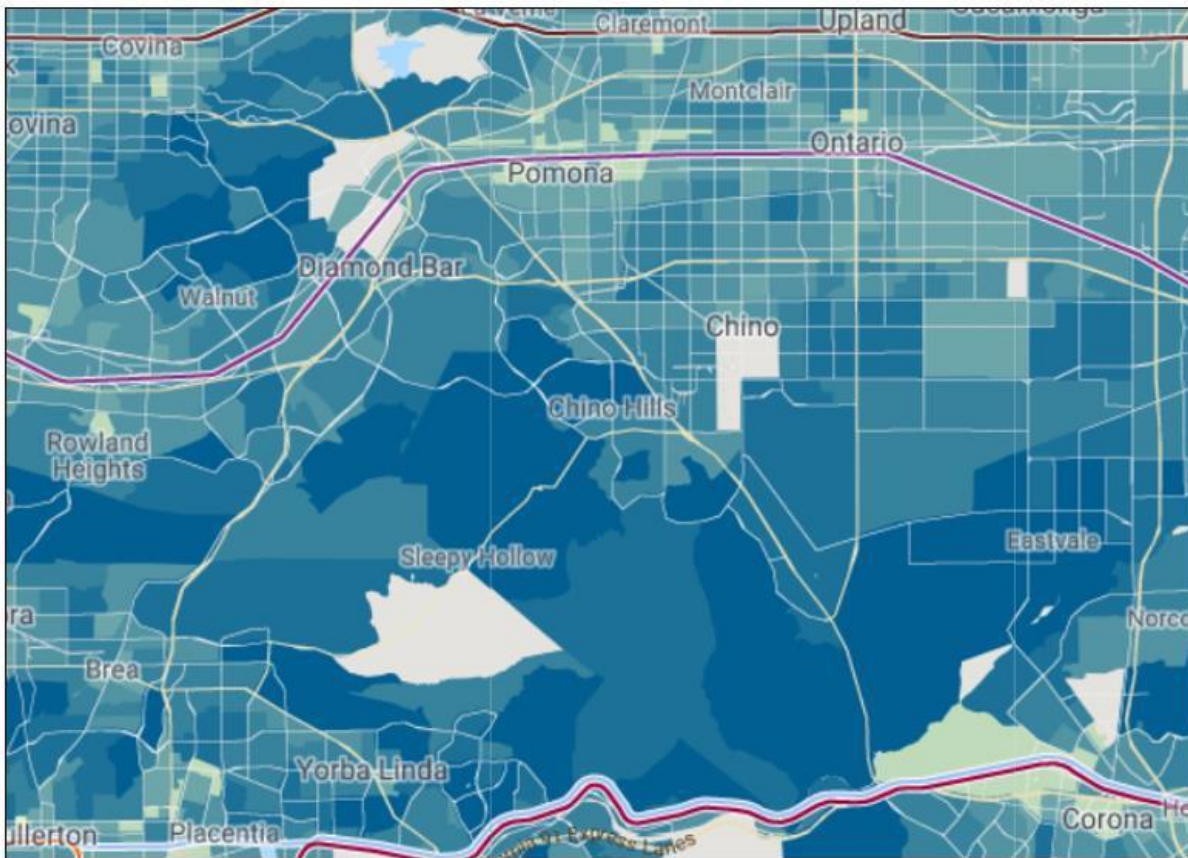
FIGURE 18. WALKABILITY IN THE CITY OF CHINO HILLS



Map Source: Walkscore, Retrieved from: https://www.walkscore.com/CA/Chino_Hills

High transportation costs also contribute to overall low levels of affordability in Chino Hills. For a typical household in the region, combined housing and transportation costs associated with residing in Chino Hills would make up an estimated 80 percent of household income (see Figure 19).

FIGURE 19. HOUSING AND TRANSPORTATION COSTS AS A PERCENT OF HOUSEHOLD INCOME IN THE CITY OF CHINO HILLS AND SURROUNDING AREAS



Housing + Transportation Costs as Percent of Income

< 24%
 24-36%
 36-45%
 45-54%
 54-66%
 66-78%
 78-87%
 87%+

For typical regional households with 1.31 workers, income of \$60,705 and household size of 3.03 people

Source: Center for Neighborhood Technology Housing + Transportation Affordability Index

Poverty

Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated.

HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Values are standardized based on national ranking to produce scores ranging from 0 to 100 where a higher score indicates less exposure to poverty.¹⁸ Figure 20 maps Low Poverty Index scores for Chino Hills. Lighter shading indicates areas of higher poverty and darker shading indicates lower levels of poverty. Figure 21 also shows concentrations of poverty by block group in Chino Hills.

LOW POVERTY INDEX: BASED ON NEIGHBORHOOD POVERTY RATES

Most block groups in the city have relatively low exposure to poverty, and the overall poverty rate in Chino Hills is 6.3 percent (see Table 7). However, exposure to poverty varies by location in the city, with some areas of the city experiencing higher rates of poverty than others. Specifically, a few block groups with poverty rates of 10 to 13 percent are clustered in the northern portion of the city bordering the City of Chino. The block groups surrounding Los Serranos neighborhood have the greatest exposure to poverty (up to 13 percent). Compared to the rest of the block groups in the city, residents of neighborhoods in south and west Chino Hills tend to have the least exposure to poverty.

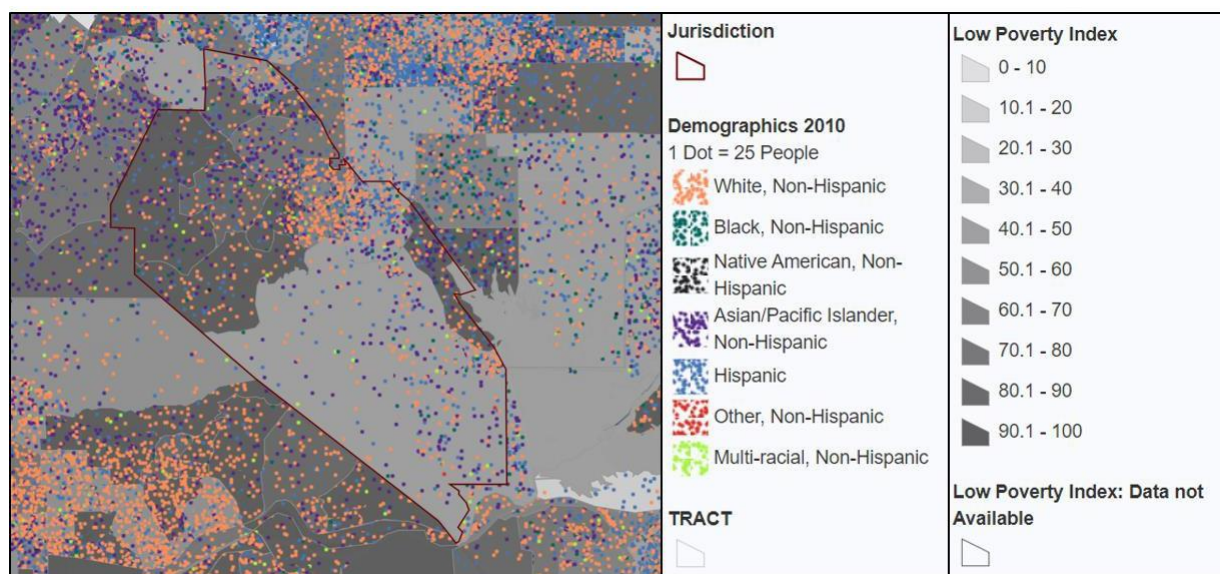
Low Poverty Index scores in Table 4 show overall high scores (low exposure to poverty) and minor disparities among racial and ethnic groups regarding exposure to poverty. The Asian or Pacific Islander and Black populations are exposed to the lowest levels of poverty among population groups. The Hispanic and Native American populations experience the greatest exposure to poverty in Chino Hills.

Low Poverty Index scores of racial and ethnic groups in the Riverside-San Bernardino region are significantly lower compared to those in the city. Asian and White populations experience the lowest exposure to poverty in the region, while Hispanic, Native American, and Black populations in the region are exposed to significantly higher levels of poverty.

American Community Survey data on poverty status by race and ethnicity shows that the White, Native American or Alaskan Native, and Native Hawaiian or Pacific Islander populations in Chino Hills are least likely to be living below the poverty level, while Black residents and residents of other races experience the highest levels of poverty. The Hispanic population constitutes the greatest number of individuals below the poverty level at more than 1,500 people (see Table 7).

¹⁸ HUD's data source for its low poverty index is the American Community Survey. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

FIGURE 20. LOW POVERTY INDEX IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 21. POVERTY RATE IN THE CITY OF CHINO HILLS AND SURROUNDING AREAS, 2012-2016

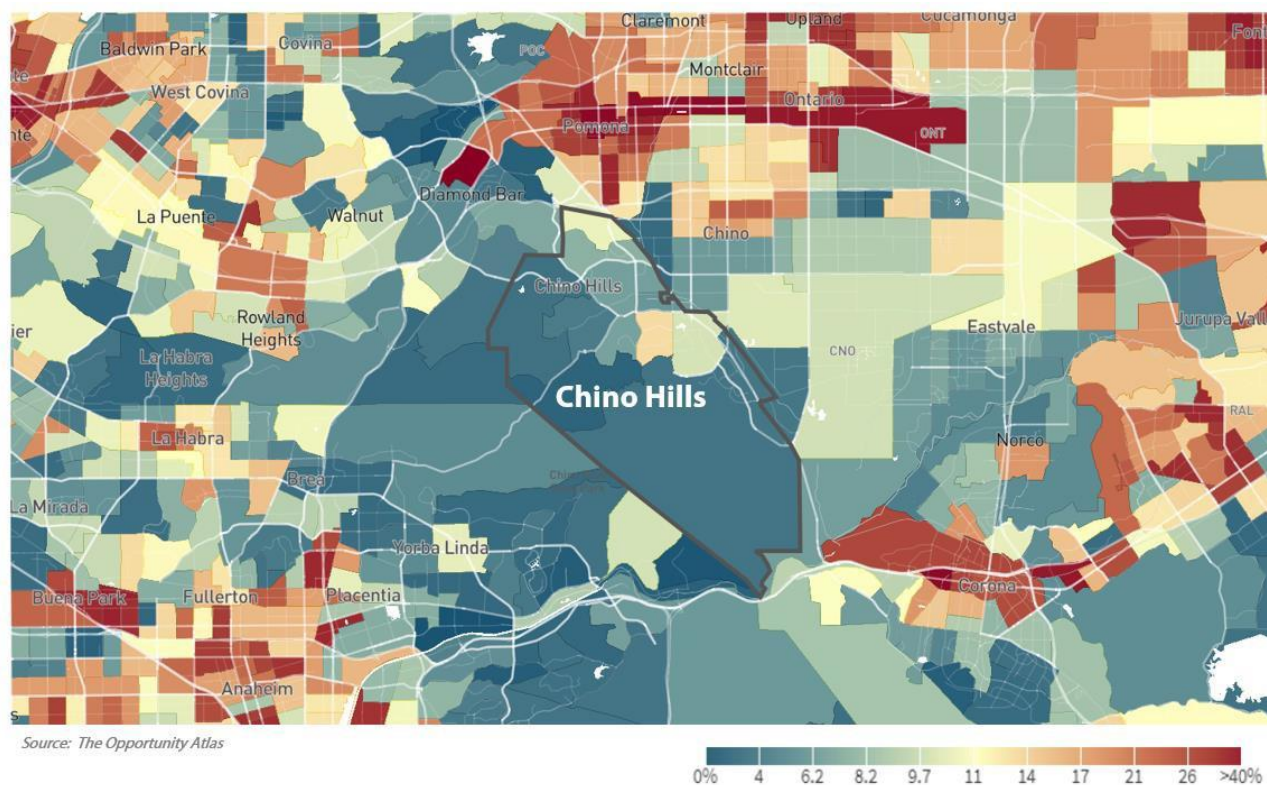


TABLE 7. POVERTY STATUS BY RACE/ ETHNICITY, CHINO HILLS, 2013-2017

Race	Population	Population Below Poverty Level	Percent Below the Poverty Level
White alone	36,365	1,221	3.4%
Black or African American alone	3,567	483	13.5%
American Indian and Alaska Native alone	329	2	0.6%
Asian alone	26,133	1,910	7.3%
Native Hawaiian and Other Pacific Islander alone	153	0	0.0%
Some other race alone	7,513	975	13.0%
Two or more races	3,710	306	8.2%
Hispanic or Latino origin (of any race)	22,326	1,578	7.1%
Total Population for Whom Poverty Status is Determined	77,770	4,897	6.3%

Source: ACS 5-Year Estimates, 2013-2017 (Table S1701)

Environmental Health

HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Values are standardized based on national ranking to produce scores ranging from 0 to 100 where a higher score

indicates less exposure to environmental hazards.¹⁹¹⁹ Figure 22 maps Environmental Health Index scores for Chino Hills. Lighter shading indicates areas of higher potential exposure to hazards and darker shading indicates lower levels of environmental hazards.

ENVIRONMENTAL HEALTH INDEX: BASED ON STANDARDIZED EPA ESTIMATES OF AIR QUALITY HAZARDS

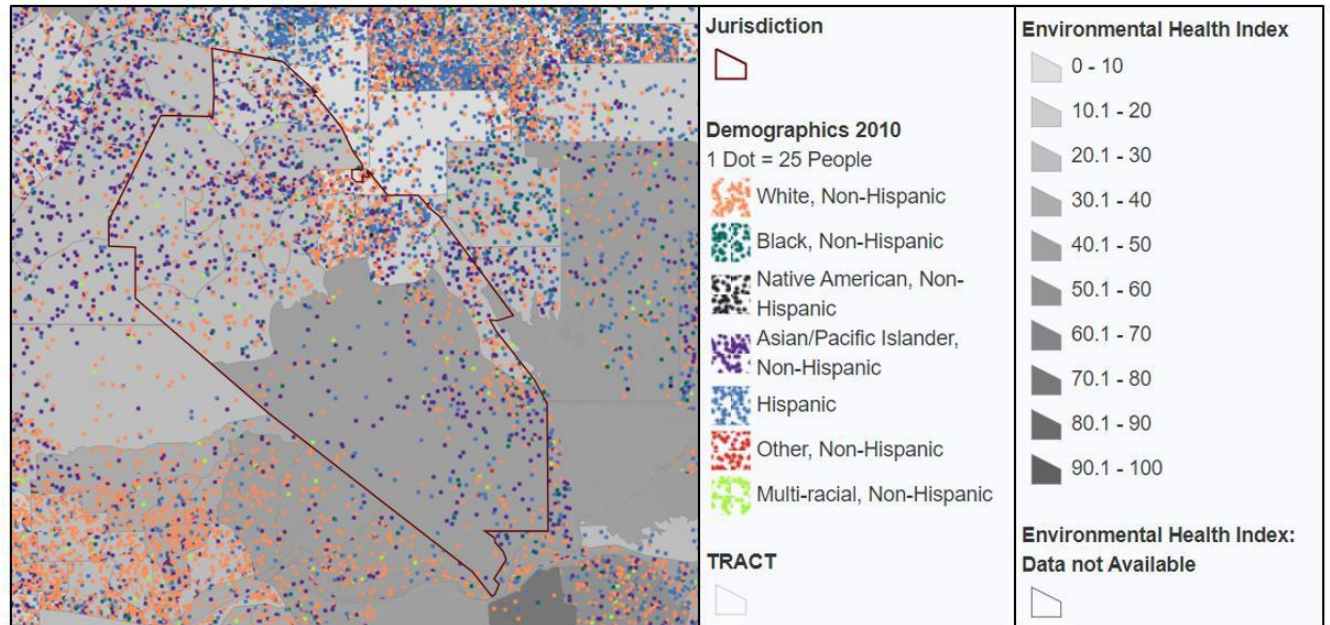
Most block groups in the City of Chino Hills have low air quality. The highest air quality in the city can be found in the southern portion of Chino Hills in the block groups that contain Chino Hills State Park and agricultural land. Spatial patterns of Environmental Health Index scores and residential patterns by race/ethnicity suggest low levels of disparity among racial and ethnic groups with regard to air quality (see Figure 22).

Environmental Health Index scores in Chino Hills also suggest high levels of exposure to low air quality across racial and ethnic groups, with little disparity among groups (see Table 4). The Black and Hispanic populations below the poverty line in the city are exposed to the lowest levels of air quality.

Air quality throughout the larger Riverside-San Bernardino-Ontario region is higher than in Chino Hills as evidenced by the higher scores, while disparities among population groups are greater than those found in the city. White and Native American populations in the region experience the highest levels of air quality. Index scores suggest that Hispanic and Asian populations reside in areas in the region with the lowest air quality.

¹⁹ HUD's data source for its environmental health index is the EPA's National Air Toxins Assessment (NATA) data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

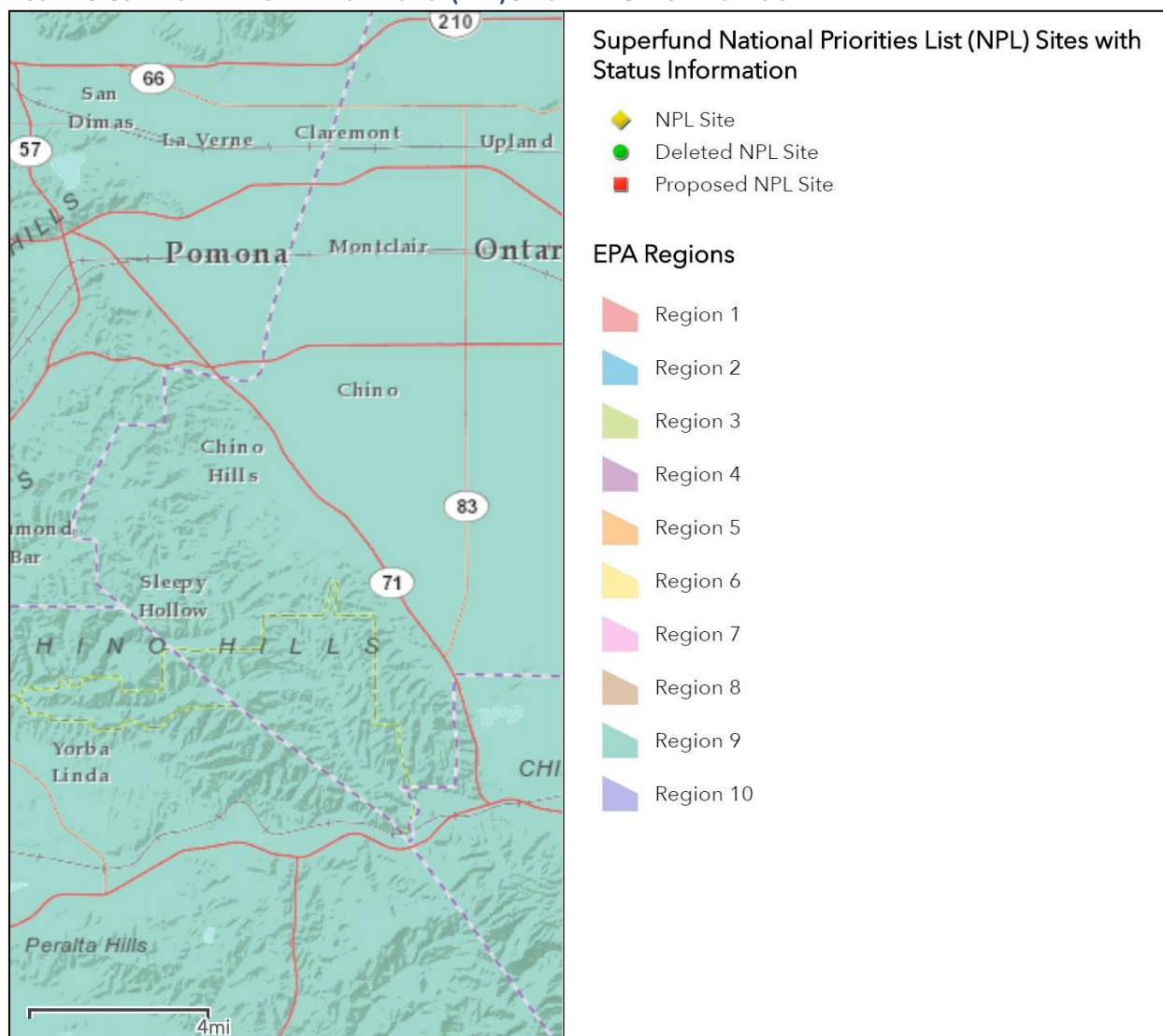
FIGURE 22. ENVIRONMENTAL HEALTH INDEX IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There are no Superfund sites in Chino Hills or in areas immediately surrounding the city (see Figure 23).

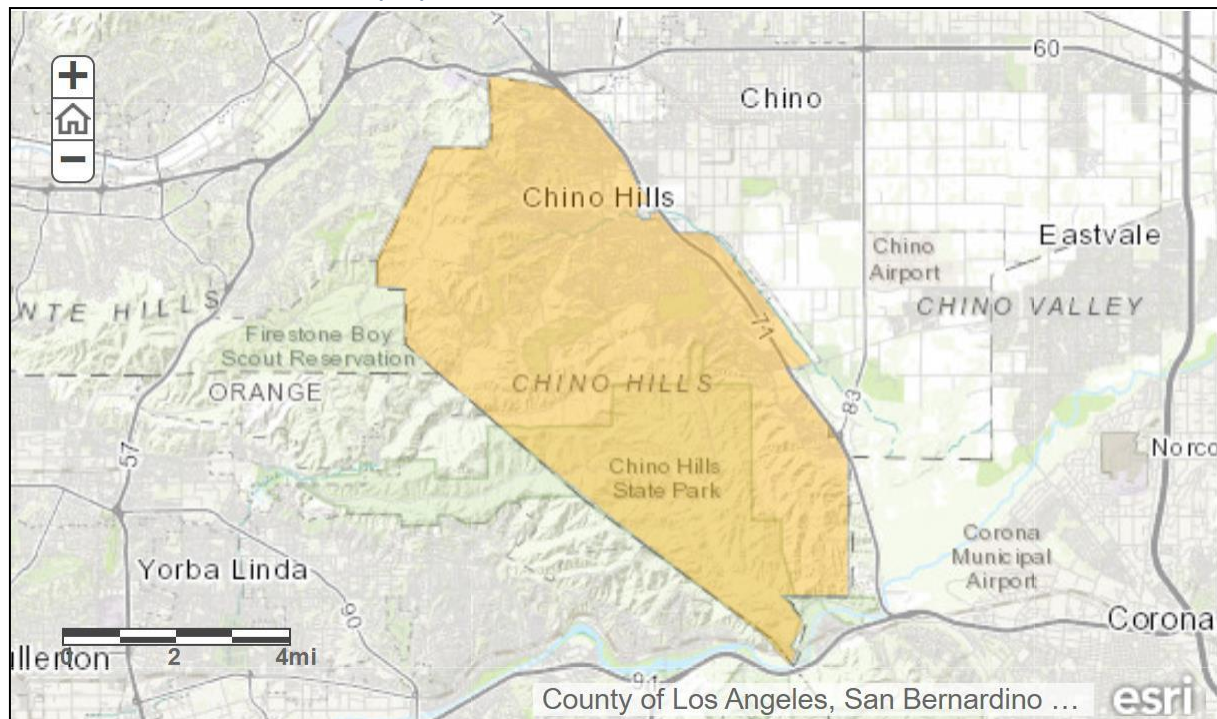
FIGURE 23. SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE CHINO HILLS REGION



Map Source: Environmental Protection Agency GIS Data, Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. There are no sites located within the boundaries of Chino Hills (see Figure 24).

FIGURE 24. TOXIC RELEASE INVENTORY (TRI) IN THE CITY OF CHINO HILLS



Map Source: Environmental Protection Agency GIS Data, Retrieved from:
<https://iaspub.epa.gov/triexplorer/msa.html?pYear=2016&pParent=NAT&pLoc=218>

Summary

Chino Hills residents generally have access to proficient schools, and poverty levels in the city are low. Residents of the city tend to have moderate proximity to jobs, labor market engagement, and levels of transit usage, with low levels of disparity among racial and ethnic groups. Low scores on the Low Transportation Cost Index indicate low levels of access to low-cost transportation in the city, and low scores on the Environmental Health Index suggest poor air quality, with similar scores across racial and ethnic groups. Greater disparities among racial and ethnic groups exist with regard to all of these measures of access to opportunity for the population living below the poverty level. Spatial patterns show overall low levels of disparities among racial and ethnic groups in access to proficient schools, proximity to jobs, transit usage, access to low cost transit, exposure to poverty, and environmental health in Chino Hills. Moderate disparities exist among racial and ethnic groups with regard to labor market engagement.

Low levels of disparities exist among racial and ethnic groups regarding access to proficient schools in Chino Hills. There is a 6.5-point differential between the groups with the best and worst access to proficient schools. Disparities are greater at the regional level, and access to proficient schools is significantly lower for all groups.

Chino Hills has moderate Jobs Proximity Index scores with low levels of disparities in distance to job locations among racial and ethnic groups. Proximity to jobs is slightly higher at the regional level, with little disparity among racial and ethnic groups. In combination with these moderate Jobs Proximity index scores, stakeholder input and Longitudinal Employer-Household Dynamics data suggest that many workers who live in the city commute long distances to their places of work. In particular, 95 percent of workers living in Chino Hills are employed outside of the city.

Labor Market Index scores indicate moderate levels of disparities among racial and ethnic groups in labor market engagement in Chino Hills. The Asian population has the highest level of engagement with the labor market among all groups (71.0 points), followed by the Black population (69.6 points). The greatest disparity in labor market engagement, with a difference of 25 points, is between the Asian population (71 points) and the Hispanic population below the poverty line (48 points).

Transit Trip Index scores indicate little disparity and overall low levels of transit usage among racial and ethnic groups in San Bernardino County. Hispanic and Native American populations use transit at the highest rates.

Low Transportation Cost scores are generally low and uniform throughout most block groups in the city and disparities are low among racial and ethnic groups. The Hispanic population below the poverty level in the city experience lower transportation costs and closer proximity to public transportation compared to other groups.

Low Poverty index scores indicate that only a small portion of the city's population is exposed to high levels of poverty. Native American populations in the city experience the greatest exposure to poverty, while Asian and Black populations are the least exposed to poverty. Lower scores in the region suggest that residents of other cities in the valley area are more exposed to poverty relative to Chino Hills residents and reflect relatively higher housing costs and a lack of housing affordable to low-income households in Chino Hills.

Air quality is low across block groups in Chino Hills, although block groups in the southern portion of the city around the state park experience slightly better air quality. Environmental Health Index scores suggest little disparity in exposure to low air quality among racial and ethnic groups. The Black population below the poverty level experience the greatest exposure to low air quality.

CHAPTER 6.

HOUSING PROFILE

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies show affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low- and middle- income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.²⁰ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.²¹ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²²

This section discusses the existing supply of housing in the City of Chino Hills and in the Riverside-San Bernardino-Ontario MSA. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

Housing Supply Summary

According to the 2012-2016 American Community Survey, there are 22,325 housing units in Chino Hills, up only slightly (0.4%) since 2000. The most recent data available, from the State of California Department of Finance, estimates 25,850 housing units in Chino Hills as of January 2020. The vacancy rate is 6.5%, up 1.4 percentage points from 2000, but still relatively low compared to the region. The vacancy rate,

²⁰ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

²¹ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

²² Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

calculated from ACS data, includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Thus, the actual number of rental and for-sale units that are available for occupancy are likely lower than these figures indicate.

TABLE 8 – HOUSING UNITS BY OCCUPANCY STATUS

	2000	2010	2012-2016	2000-2016 Change
City of Chino Hills				
Total Housing Units	22,233	22,628	22,325	0.4%
Occupied Housing Units	21,110	21,428	20,882	-1.1%
Vacant Housing Units	1,123	1,200	1,443	28.5%
Vacancy Rate	5.1%	5.3%	6.5%	+1.4% points
Riverside-San Bernardino-Ontario, CA Metro Area				
Total Housing Units	1,186,043	1,500,344	1,528,742	28.9%
Occupied Housing Units	1,034,812	1,297,878	1,324,638	28.0%
Vacant Housing Units	151,231	202,466	204,104	35.0%
Vacancy Rate	12.8%	13.5%	13.3%	+0.5% points

Data Source: U.S. Census 2000 SF1 Table H003, U.S. Census 2010 SF1 Table H3, 2012-2016 5-Year American Community Survey Table B25002

Variety in terms of housing structure type is important in providing housing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable than single-family homes for low- and moderate-income households, who are disproportionately likely to be households of color. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 9 shows housing units by structure type in Chino Hills. Single-family detached homes make up the largest share of structure types at 78.7%. Small multi-family properties with 5 to 19 units per structure make up the second largest share (7.8%), followed by single-family attached homes (4.7%). Larger multifamily properties with 50 or more units make up 3.5%. Mobile homes make up 2.8% of structures. The smallest percentage of structure types are duplexes, triplexes, and quadraplexes (1.8%) and medium-sized multi-family (0.6%). Similarly, in the region single-family detached units are most common (69%). However, duplexes, triplexes, quadraplexes and mobile homes exist more frequently in the region than in Chino Hills.

TABLE 9 – HOUSING UNITS BY STRUCTURE TYPE

Units in Structure	City of Chino Hills		Riverside-San Bernardino-Ontario, CA Metro Area	
	Number	Percent	Number	Percent
1, detached	19,678	78.7%	1,057,014	69%
1, attached	1,179	4.7%	75,451	4.9%
2-4	447	1.8%	86,229	5.6%
5-19	1,961	7.8%	116,721	7.6%
20-49	153	0.6%	28,843	1.9%
50 or more	884	3.5%	47,169	3%
Mobile home	710	2.8%	115,049	7.5%
Other (RV, boat, van, etc.)	0	0.0%	2,266	0.1%
Total	25,012	100.0%	1,528,742	100.0%

Data Source: 2012-2016 5-Year American Community Survey Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. But market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford suitably sized homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

As Table 10 shows, owner-occupied housing is typically larger than renter-occupied housing. Units with four or more bedrooms make up approximately 58% of Chino Hills' owner-occupied housing stock. Three-bedroom units are second most common (33.8%). Renter-occupied housing stock tends to consist of two-bedroom units (35.0%) and three-bedroom units (30.7%). In the Riverside-San Bernardino-Ontario MSA, units with three bedrooms are most common (45%), followed by units with four or more bedrooms (38%). The most common type of renter-occupied unit in the region is the two-bedroom unit (about 38%).

TABLE 10 – HOUSING UNITS BY BEDROOMS IN CHINO HILLS AND SAN BERNARDINO COUNTY

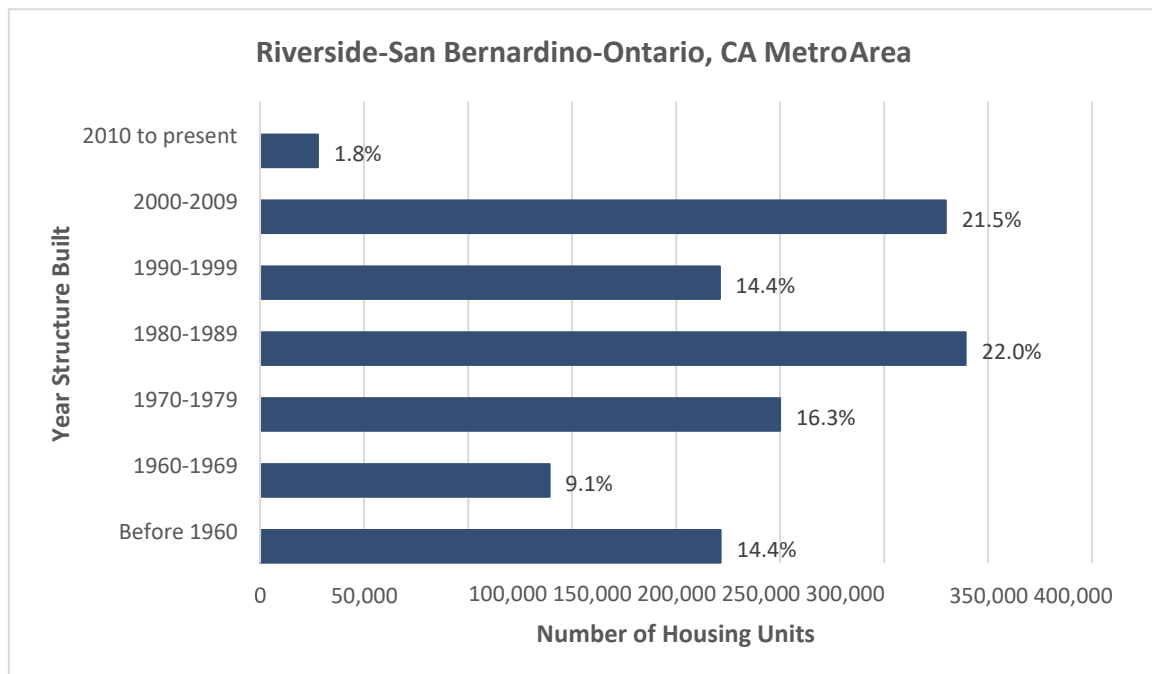
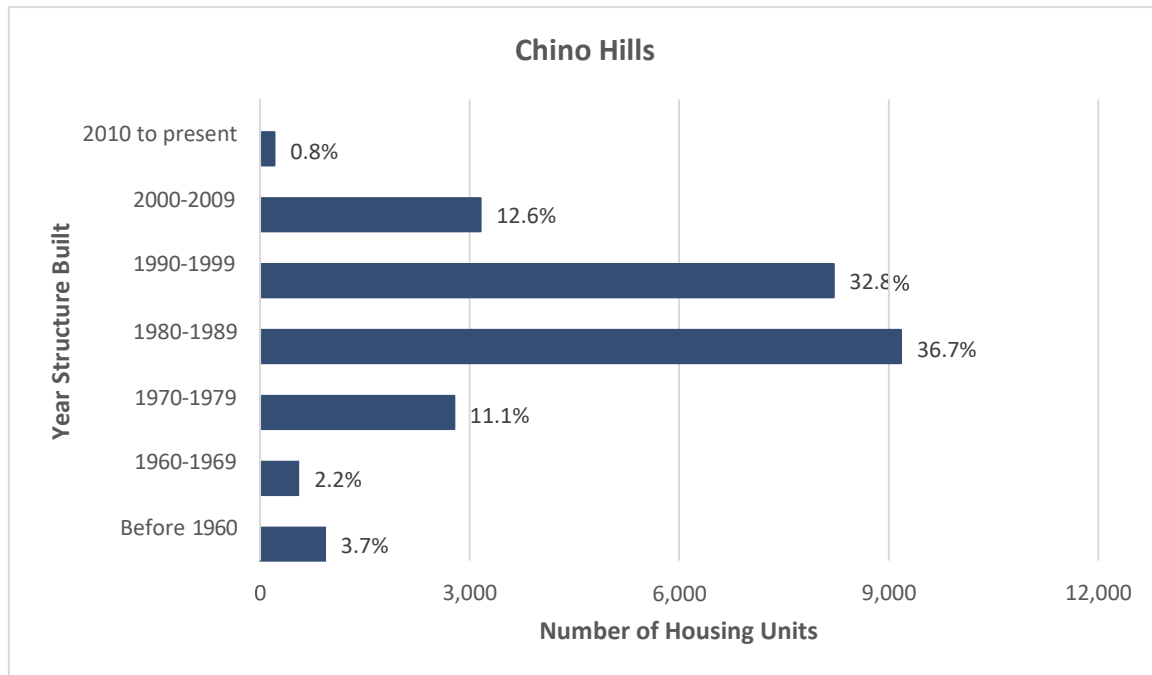
Number of Bedrooms	City of Chino Hills		Riverside-San Bernardino-Ontario, CA Metro Area	
	Number	Percent	Number	Percent
Owner-Occupied Housing Units				
Zero or one	88	0.5%	21,123	2.6%
Two	1,460	7.8%	133,612	14.2%
Three	6,297	33.8%	342,868	44.9%
Four or more	10,783	57.9%	322,897	38.3%
Total	18,628	100.0%	820,500	100.0%
Renter-Occupied Housing Units				
Zero or one	929	17.2%	101,642	20.2%
Two	1,895	35.0%	190,182	37.7%
Three	1,660	30.7%	138,286	27.4%
Four or more	922	17%	74,028	14.7%
Total	5,406	100.0%	504,138	100.0%

Data Source: 2012-2016 5-Year American Community Survey Table B25042

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area's housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

Housing stock in Chino Hills is significantly newer than that of San Bernardino County. Approximately 37% of Chino Hills' housing was built between 1980 and 1989, with another 33% built between 1990 and 1999. Most houses in Chino Hills are unlikely to have environmental risks associated with older homes, although about 17% of units were built prior to 1980 and may have lead-related issues. The housing stock in the region shows greater variation in age, with 23% of the housing stock built before 1970. Conversely, 21% of the region's housing stock was built between 2000-2009 during a period in which only 12.6% of structures in Chino Hills were built.

FIGURE 25 – AGE OF HOUSING IN THE CITY OF CHINO HILLS AND SAN BERNARDINO COUNTY



Housing Costs and Affordability

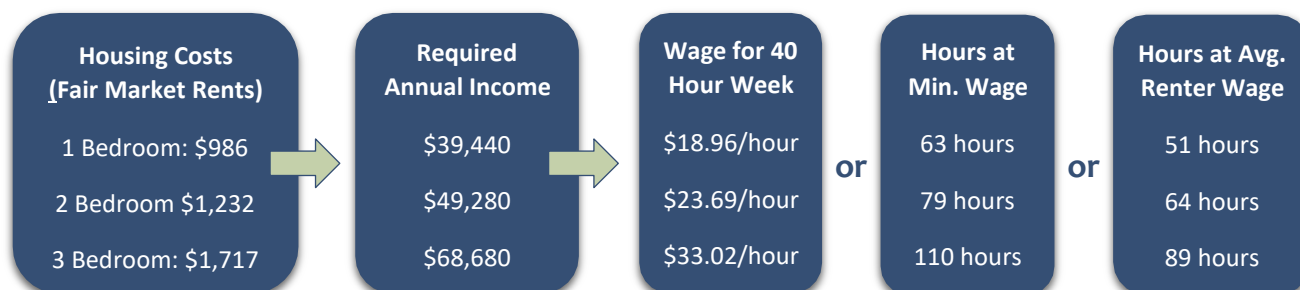
The most common housing need identified by stakeholders is affordability, particularly for low- and moderate-income households. The National Low Income Housing Coalition's annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. Figure 26 shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in for one, two, and three-bedroom rental units in San Bernardino County.

TO AFFORD A 2-BEDROOM RENTAL UNIT AT FMR OF \$1,232 TRANSLATES TO AN HOURLY WAGE OF \$24, A 79-HOUR WORK WEEK AT MINIMUM WAGE, OR A 64-HOUR WORK WEEK AT THE AVERAGE RENTER WAGE.

Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market.

To afford a one-bedroom rental unit at San Bernardino County's FMR of \$986 without being cost burdened (i.e., spending more than 30% of income on housing) would require an annual income of at least \$39,440. This amount translates to a 40-hour work week at an hourly wage of about \$19, or a 63-hour work week at the minimum wage of \$12. For households with incomes equal to San Bernardino County's median renter wage of \$14.88, a one-bedroom unit would be affordable given at least a 51-hour work week. San Bernardino County's two-bedroom FMR of \$1,232 translates to an hourly wage of \$24, a 79-hour work week at minimum wage, or a 64-hour work week at the average renter wage.

FIGURE 26 – REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS IN SAN BERNARDINO COUNTY, 2018



Note: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. Minimum wage in San Bernardino County is \$12.00. The average renter wage is \$14.88 in San Bernardino County.

Source: National Low Income Housing Coalition *Out of Reach* 2018, Accessed from <http://nlihc.org/oor/califo>

Gross rent (contract rent plus utilities) for the City of Chino Hills is shown in Figure 27, as of the 2012-2016 American Community Survey. In Chino Hills, the largest share of renters spends between \$1,500 and \$2,500 per month on rent (60% of renters). One-fifth of City of Chino Hills renters (20%) spend between \$1,000 and \$1,500 per month on rent. Only 4% of renters spend less than \$1,000 per month on rent.

These shares are significantly higher than in San Bernardino County, where 36% spend less than \$1,000 per month and 37% of renters spend between \$1,000-\$1,500 on rent. Similarly, a combined 70% of renters spend no more than \$1,500 for rent in the Riverside-San Bernardino-Ontario metro area. Given that Chino Hills housing is considerably more expensive than that of the region, voucher holders who are looking for units within county- or regionwide Fair Market Rent guidelines are less likely to be able to find affordable units in the city.

Figure 28 shows the distribution of monthly owner costs (mortgages, real estate taxes, insurance, and utilities) for owner households with a mortgage. Monthly owner costs in Chino Hills tend to be higher than those of the region. Over 60% of Chino Hills homeowners spend between \$1,500 and \$3,000 per month on housing costs. Comparatively, 50% of owners in the county and region spend between \$1,000 and \$2,000 on housing costs. Overall, these housing cost figures show that lower-priced housing for both renters and owners is rarer in Chino Hills than in the larger region.

FIGURE 27 – GROSS RENT FOR RENTER HOUSEHOLDS IN CHINO HILLS, SAN BERNARDINO COUNTY AND THE RIVERSIDE-SAN BERNARDINO-ONTARIO MSA

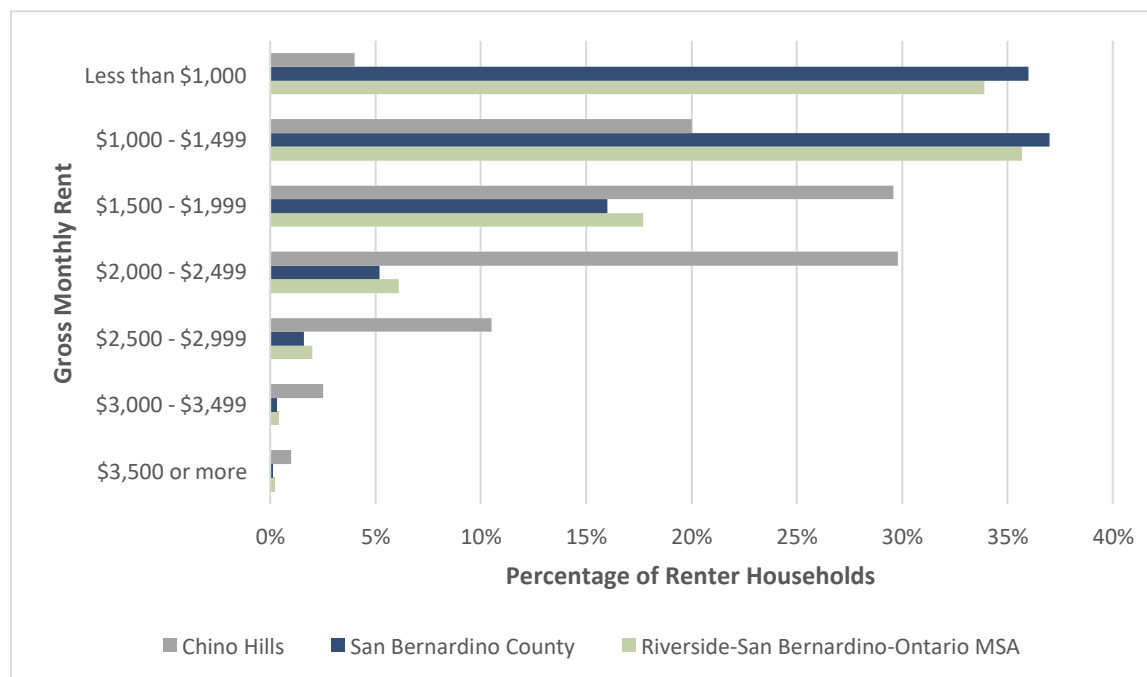
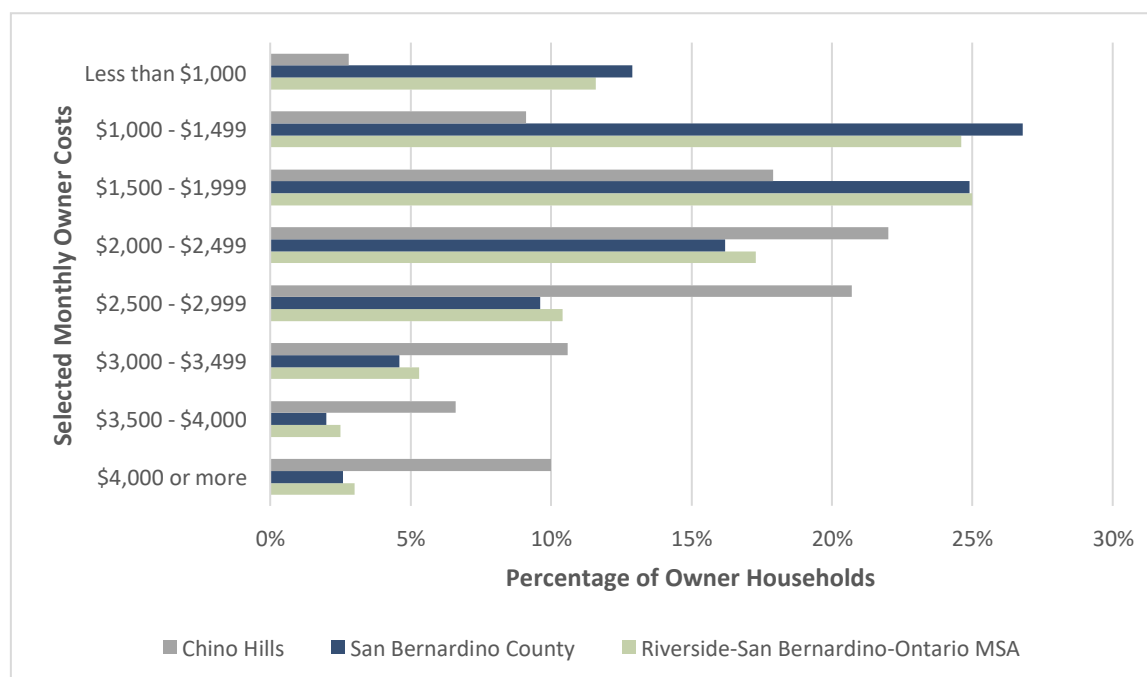


FIGURE 28 – SELECTED MONTHLY OWNER COSTS FOR OWNER HOUSEHOLDS WITH A MORTGAGE IN CHINO HILLS, SAN BERNARDINO COUNTY AND THE RIVERSIDE-SAN BERNARDINO-ONTARIO MSA



Housing Needs

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

HOUSEHOLDS OF COLOR ARE MORE
LIKELY TO HAVE A HOUSING NEED
THAN WHITE HOUSEHOLDS IN THE CITY
OF CHINO HILLS.

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for the City of Chino Hills and the Riverside-San Bernardino-Ontario region is provided in the tables that follow.

In Chino Hills, there are 9,640 households with a housing problem, representing 42.4% of households citywide. There are also 4,570 households (20.1%) with at least one severe housing problem. Housing problems occur at a greater rate in the region; nearly half (49.2%) of households have a housing problem, and 27.8% have a severe housing problem.

Table 11 shows housing needs in Chino Hills and in the region by race and ethnicity. Over one-third of non-Hispanic White households in Chino Hills experience a housing need (36.9%). HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of White households. In the city, Black and Hispanic households experience disproportionately higher rates of housing need than White households. Over 60% of Black households,

half of Hispanic households (49.1%), and 46.7% of other, non-Hispanic households have a housing problem in Chino Hills.

Severe housing problems in the city affect 16.8% of White households. Comparatively, Native American households are the only racial or ethnic group that have a disproportionately high rate of severe housing problems (40%).

In the Riverside-San Bernardino-Ontario region, Hispanic, Black and other, non-Hispanic households again have a disproportionate rate of housing problems. While 40.4% of White households have a housing problem, 58.9% of Hispanic households, 58.3% of Black households and 50.5% of other, non-Hispanic households also have a housing problem in the region. Severe housing problems disproportionately affect Hispanic households (37.1%) and Black households (33.3%), compared to their White counterparts (20%).

Households spending more than 50% of their income on housing costs are considered severely cost burdened. Severe cost burdens affect Black households at the highest rates in both the city (23%) and the region (30%), as shown in Table 12. Black households experience a disproportionate rate of severe housing cost burden at the regional level, where 17.7% of White households have a housing problem compared to 29.8% of Black households.

Table 12 also shows severe cost housing burden rates for households by size and familial type. In Chino Hills, non-family households experience the greatest rate of severe housing cost burden. Over one-third of non-family households have a severe cost burden, compared to 14.8% for small families and 12.2% for large families. In the region, non-family households also have a greater rate of severe housing cost burden than other family types (26.6%) Family households at the regional level experience greater cost burdens than in Chino Hills, with 19.6% of small families and 18.8% of large families having a severe housing cost burden.

TABLE 11 – DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

Disproportionate Housing Needs	City of Chino Hills			Riverside-San Bernardino-Ontario Region		
Households Experiencing any of the Four Housing Problems	# with problems	# of Household	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	3,370	9,135	36.9%	248,500	615,660	40.4%
Black, Non-Hispanic	410	675	60.7%	56,215	96,380	58.3%
Hispanic	2,685	5,465	49.1%	276,310	469,370	58.9%
Asian or Pacific Islander, Non-Hispanic	2,850	6,773	42.1%	37,085	75,739	49.0%
Native American, Non-Hispanic	10	25	40.0%	2,874	5,864	49.0%
Other, Non-Hispanic	300	643	46.7%	12,120	24,015	50.5%
Total	9,640	22,745	42.4%	633,100	1,287,025	49.2%
Household Type and Size						
Family households, <5 People	5,905	15,485	38.1%	310,890	715,300	43.5%
Family households, 5+ People	1,550	3,395	45.7%	160,795	249,069	64.6%
Non-family households	2,180	3,865	56.4%	161,420	322,655	50.0%
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	1,530	9,135	16.8%	122,935	615,660	20.0%
Black, Non-Hispanic	150	675	22.2%	32,125	96,380	33.3%
Hispanic	1,355	5,465	24.8%	174,310	469,370	37.1%
Asian or Pacific Islander, Non-Hispanic	1,380	6,773	20.4%	20,279	75,739	26.8%
Native American, Non-Hispanic	10	25	40.0%	1,499	5,864	25.6%
Other, Non-Hispanic	145	643	22.6%	6,870	24,015	28.6%
Total	4,570	22,745	20.1%	358,025	1,287,025	27.8%

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

Source: CHAS

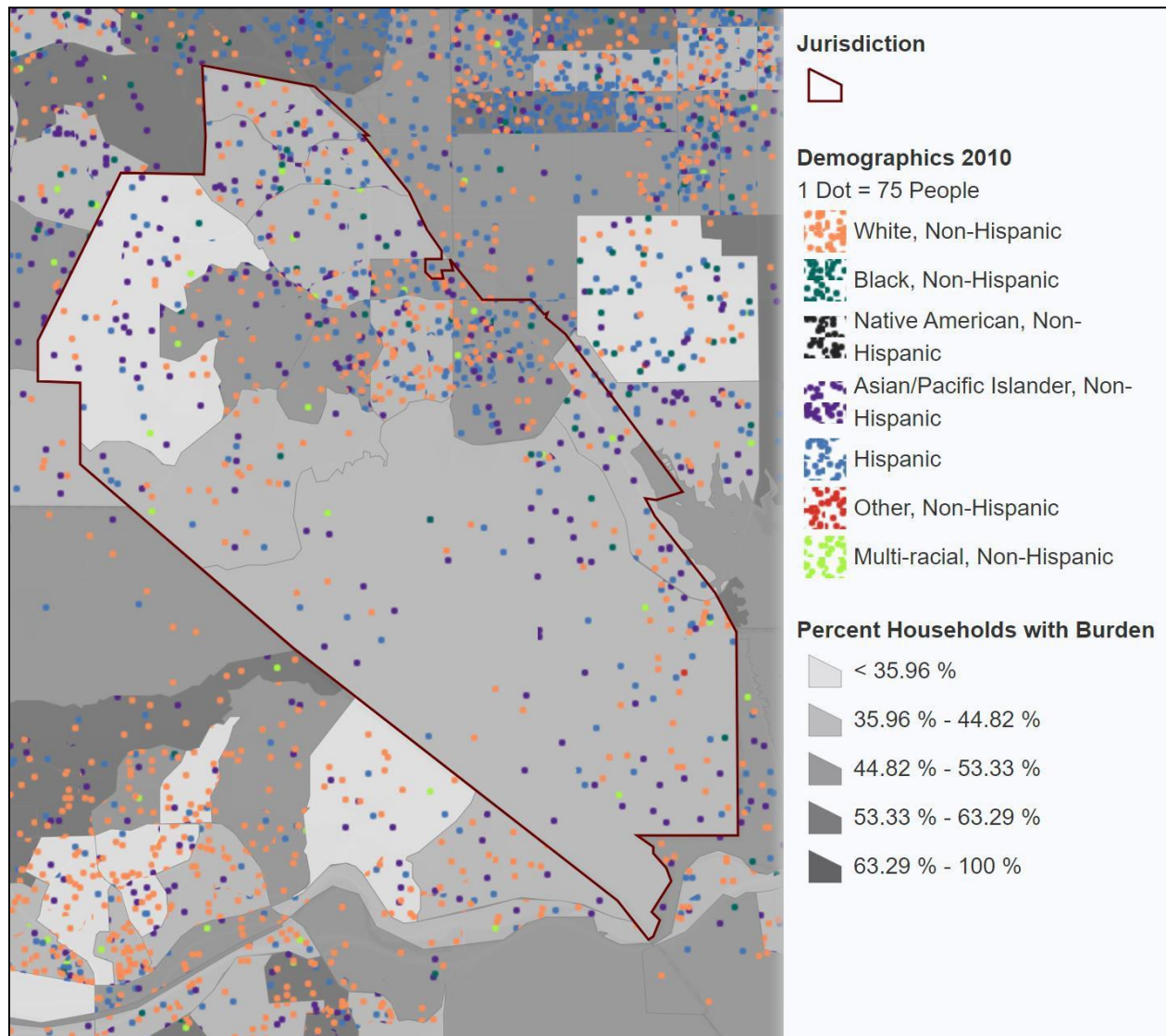
TABLE 12 – DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

Households with Severe Cost Burdens	City of Chino Hills			Riverside-San Bernardino-Ontario Region		
	# with Problems	# of Households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	1,425	9,135	15.6%	109,075	615,660	17.7%
Black, Non-Hispanic	155	675	23.0%	28,670	96,380	29.8%
Hispanic	1,130	5,465	20.7%	112,350	469,370	23.9%
Asian or Pacific Islander, Non-Hispanic	1,185	6,773	17.5%	16,065	75,739	21.2%
Native American, Non-Hispanic	-	25	0.0%	1,145	5,864	19.5%
Other, Non-Hispanic	125	643	19.4%	5,605	24,015	23.3%
Total	4,020	22,745	17.7%	272,910	1,287,025	21.2%
Household Type and Size						
Family households, <5 People	2,294	15,485	14.8%	140,335	715,300	19.6%
Family households, 5+ People	415	3,395	12.2%	46,785	249,069	18.8%
Non-family households	1,314	3,865	34.0%	85,810	322,655	26.6%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

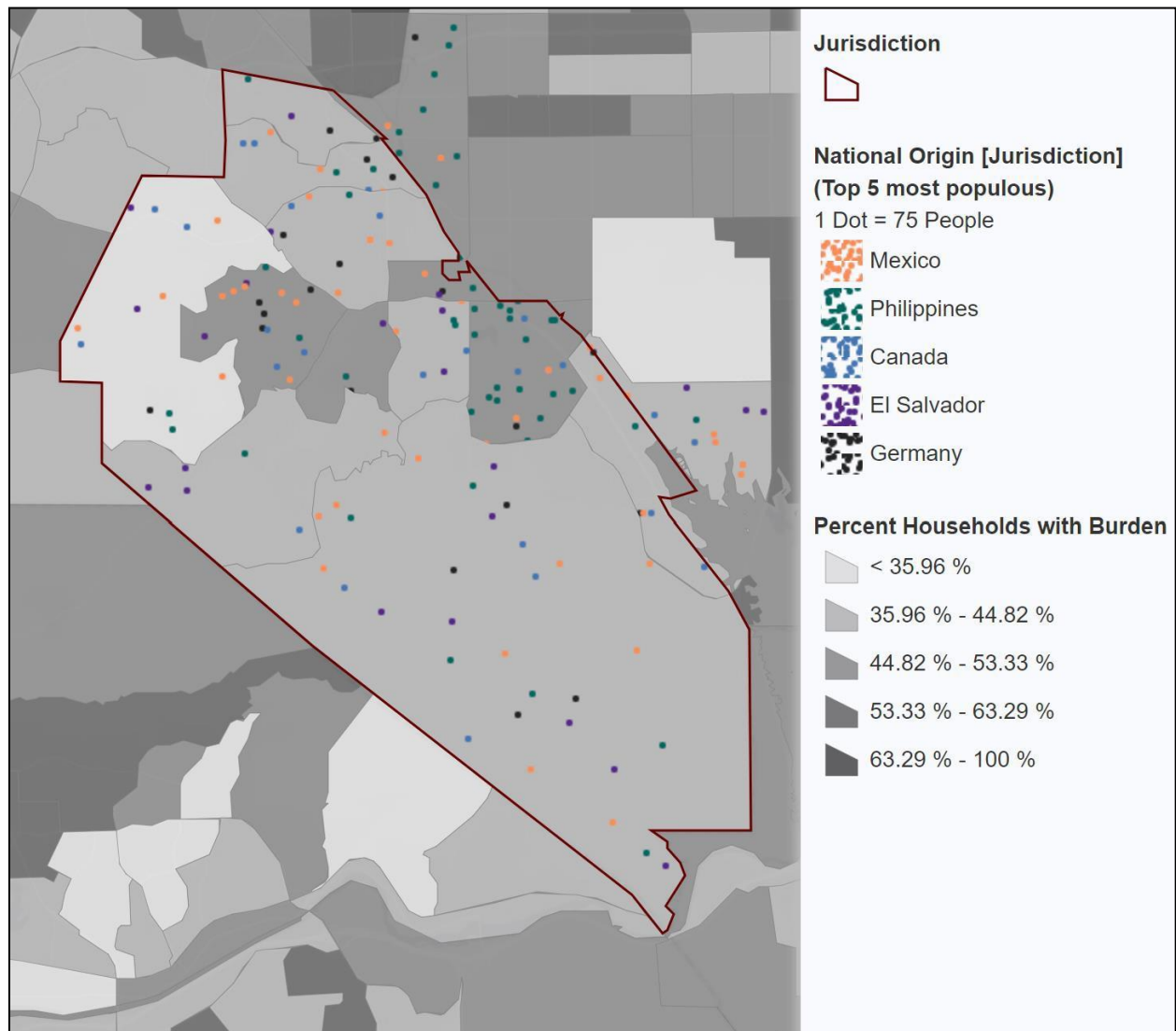
Source: CHAS

FIGURE 29 – HOUSING BURDEN AND RACE AND ETHNICITY IN THE CITY OF CHINO HILLS



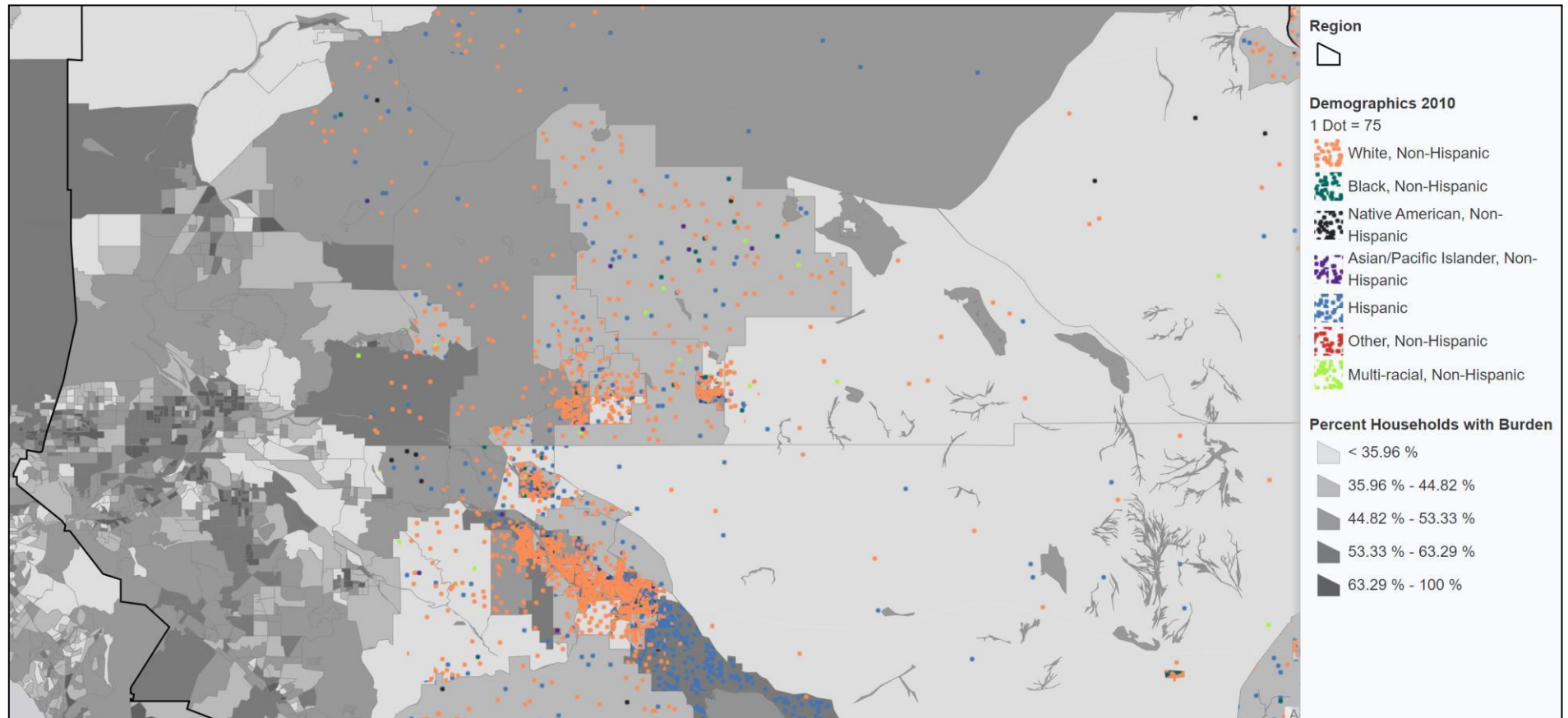
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 30 – HOUSING BURDENS AND NATIONAL ORIGIN IN THE CITY OF CHINO HILLS



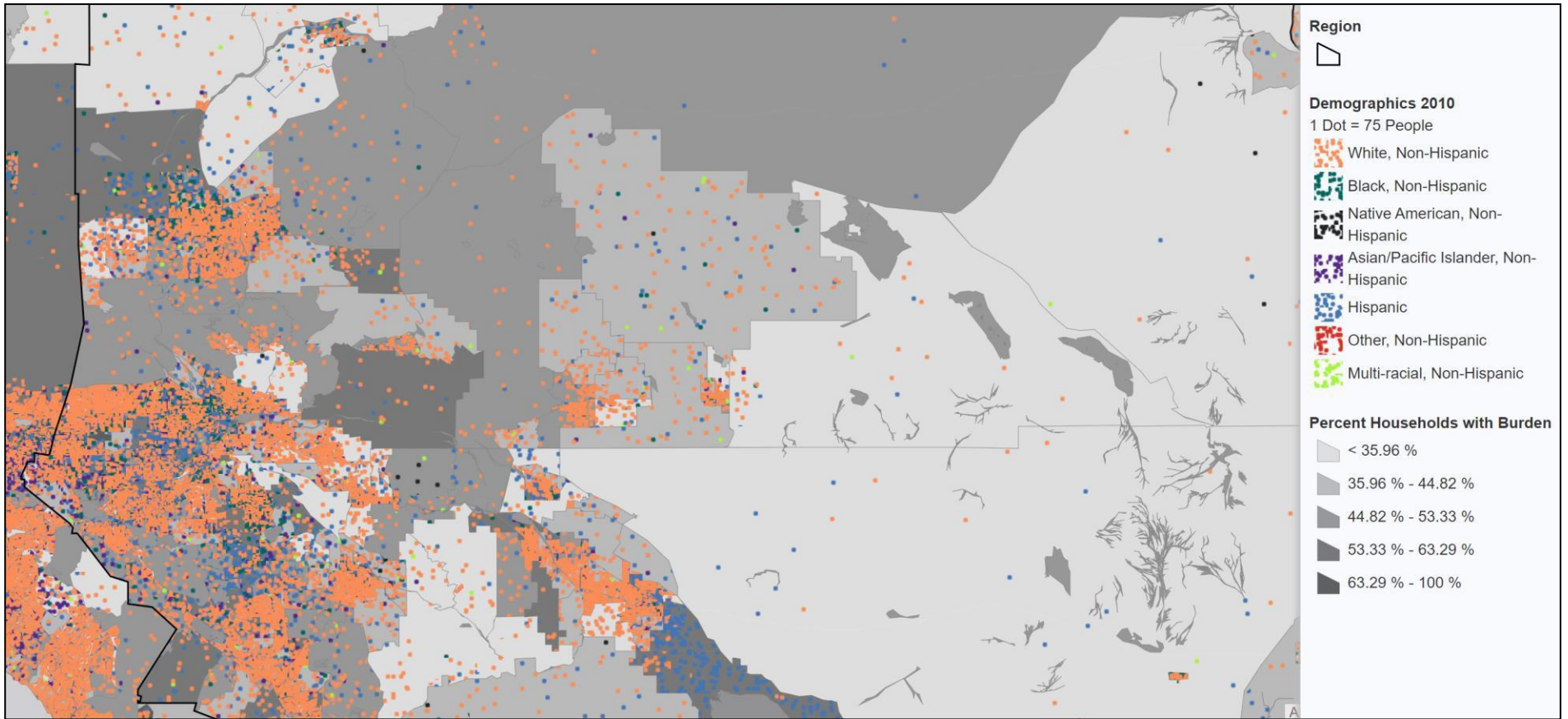
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 31 – HOUSING BURDEN AND RACE AND ETHNICITY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 32 – HOUSING BURDENS AND NATIONAL ORIGIN IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Homeownership and Lending

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,²³ and is correlated with positive cognitive and behavioral outcomes among children.²⁴

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the White and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between White and Black households; just a 2.9 percentage point decrease since 1997.²⁵

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.²⁶

Table 13 shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for the City of Chino Hills. Over three-fourths of households in Chino Hills own their homes (79.8%). Three groups have homeownership rates at 80% or higher: White households (80%), Black households (82.3%) and Asian households (84.3%). Hispanic households own homes at slightly lower rates than other groups in the city (75.0%), while 58.0% of Other, Non-Hispanic households own their homes. Homeownership rates in Chino Hills are higher for all racial and ethnic groups than in the larger MSA.

In the Riverside-San Bernardino-Ontario MSA, 64.4% of all households own their homes. The largest disparity in homeownership exists for Black households, of whom 44.7% own their homes in the MSA – nearly 38 percentage points fewer than in Chino Hills. Slightly more than half of Native American households (55.8%), Hispanic households (57.2%) and Other, Non-Hispanic households (57.3%) own their homes in the MSA. White and Asian households have the highest percentages of homeownership in the region (72.5% and 70.2%, respectively).

²³ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

²⁴ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

²⁵ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

²⁶ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

TABLE 13 – HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Race/Ethnicity	City of Chino Hills			Riverside-San Bernardino-Ontario Region		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic						
White	7,315	1,830	80.0%	446,425	169,245	72.5%
Black	560	120	82.3%	43,075	53,295	44.7%
Asian	5,720	1,060	84.3%	53,205	22,550	70.2%
Native American	25	-	-	3,275	2,590	55.8%
Other	375	270	58.0%	13,770	10,245	57.3%
Hispanic	4,100	1,365	75.0%	268,520	200,830	57.2%
Total	18,100	4,645	79.6%	828,270	458,755	64.4%

Note: Data presented are number of households, not individuals.

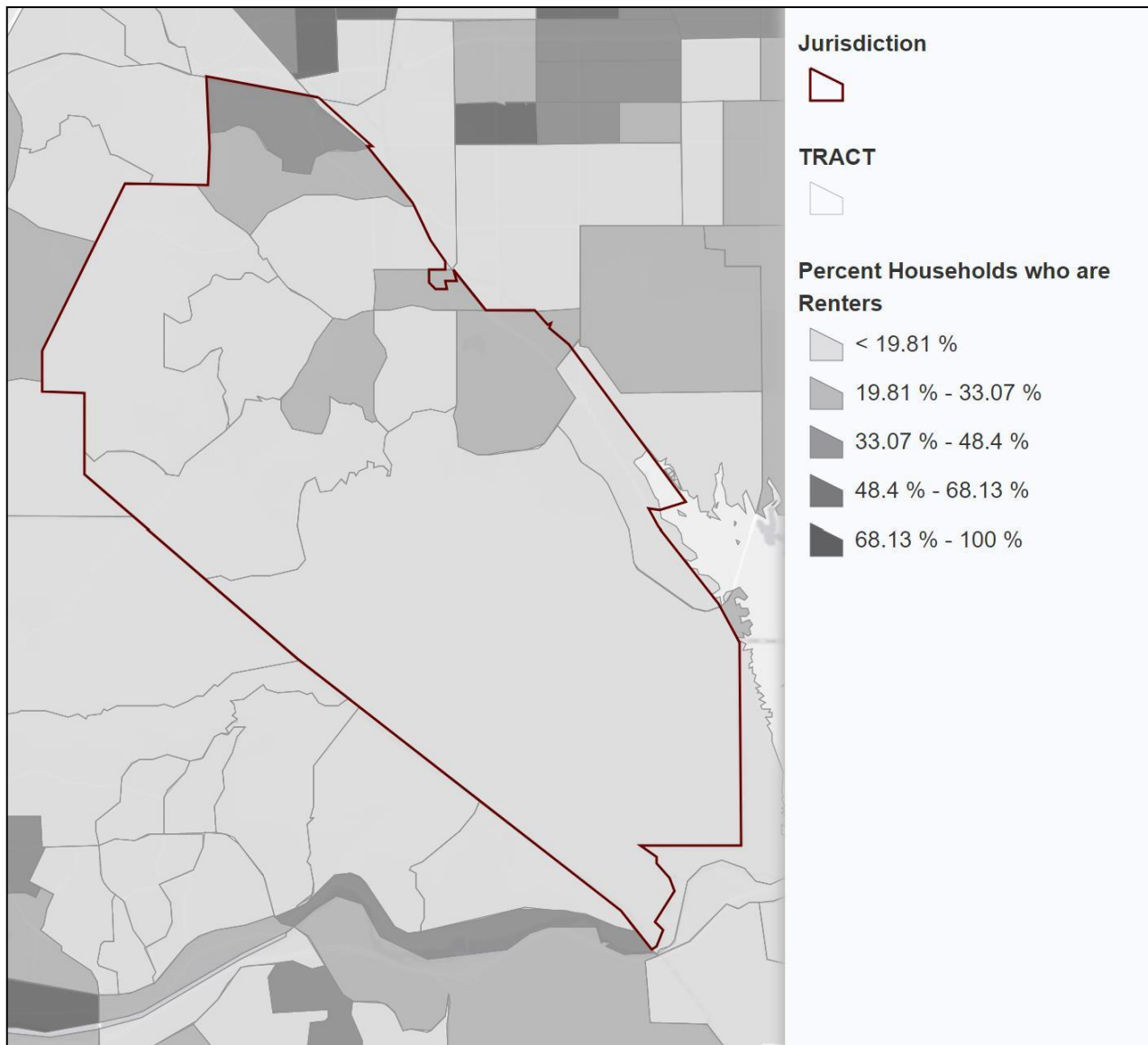
Source: CHAS

Figures 33 and 34 show the share of owners and renters by census tract in the City of Chino Hills. The largest percentage of renters is found in Census tract 1.03 north of Chino Avenue (34.4%), in neighborhoods adjacent to Los Angeles County. The second largest percentage of renters can be found in Census tract 1.13 in the Los Serranos neighborhood (31.67%). Other neighborhoods with higher renter rates are located Census tract 1.08 southwest of Chino Hills Parkway and Peyton Drive (30.5%), Census tract 1.04 in the Rolling Ridge neighborhood and to the northwest of Grand Avenue and Peyton Drive (28.9%), and Census tract 1.07 which includes the commercial area Chino Hills Marketplace (21.6%).

Homeownership rates are highest in Census tract 1.18 north of Rancho Hills Drive (96.2%). Census tract 1.17 which contains the Summit Ranch Equestrian Community has a homeownership rate of 86.7%. Census tract 1.09 immediately west of the Los Serranos neighborhood has an 86.2% homeownership rate. Seven of the city's 12 census tracts have homeownership rates above 80%. High rates of homeownership are also reflected by racial and ethnic group in Table 13.

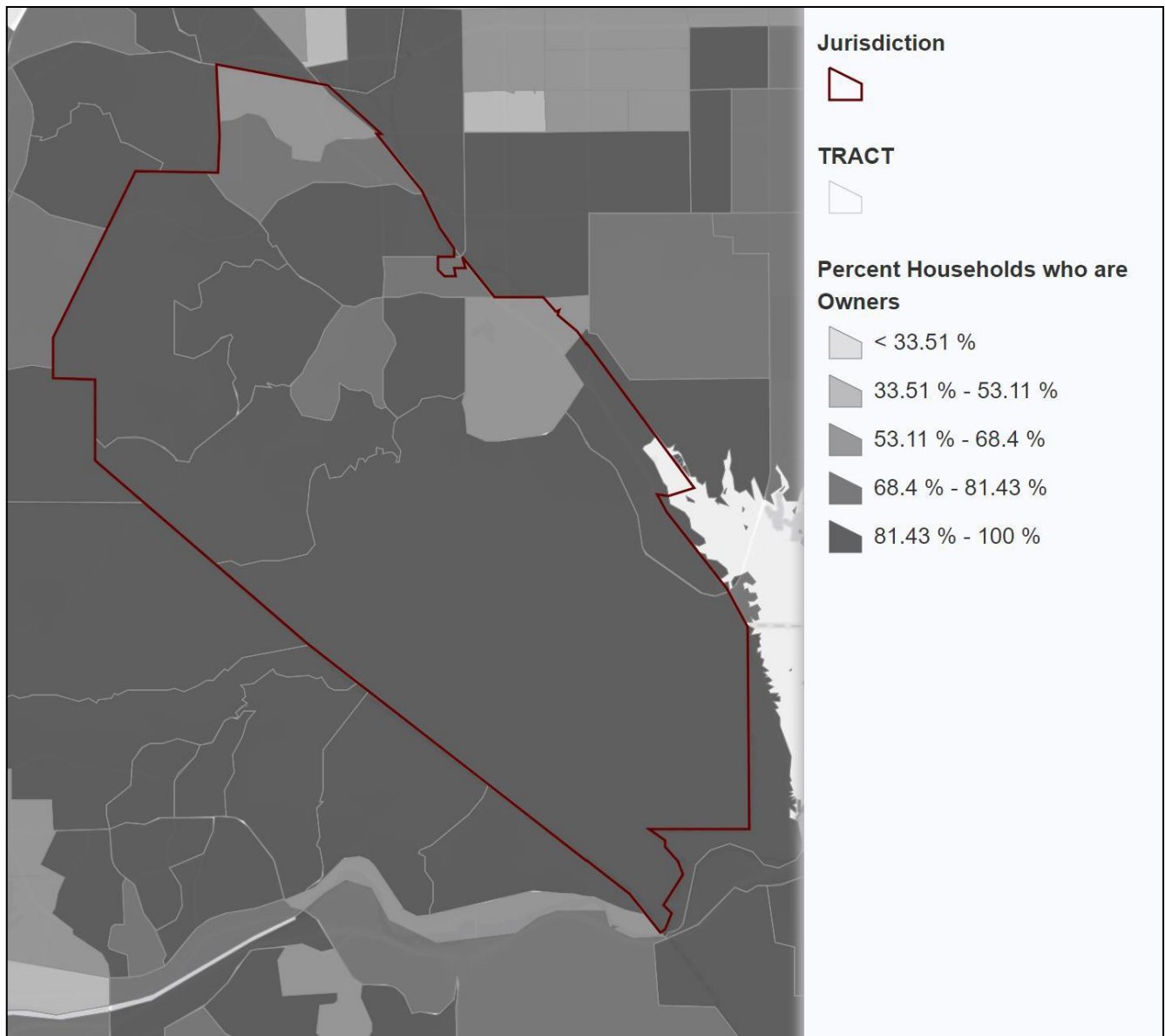
Figures 35 and 36 show the shares of renters and owners in the Riverside-San Bernardino-Ontario region. Homeownership in the region is highest in suburban areas, including northern Chino Hills, several tracts near the San Gabriel Mountains, and a cluster of tracts south of Corona, in Sun City, Wildomar, and Thousand Palms in Riverside County. In San Bernardino County, Chino Hills, Yucaipa, east Highland, and areas north of Lake Arrowhead have high rates of homeownership.

FIGURE 33 – SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE CITY OF CHINO HILLS



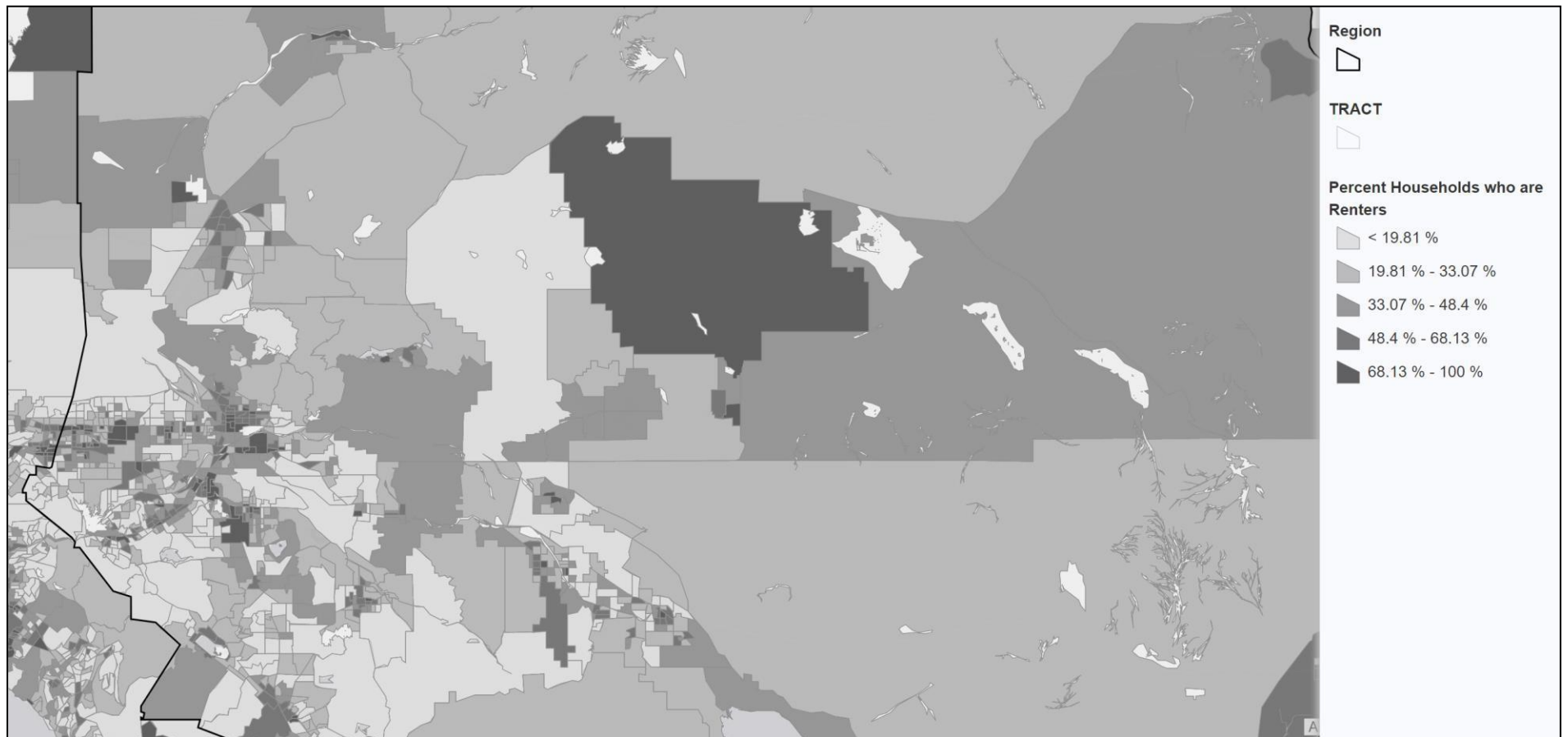
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 34 – SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE CITY OF CHINO HILLS



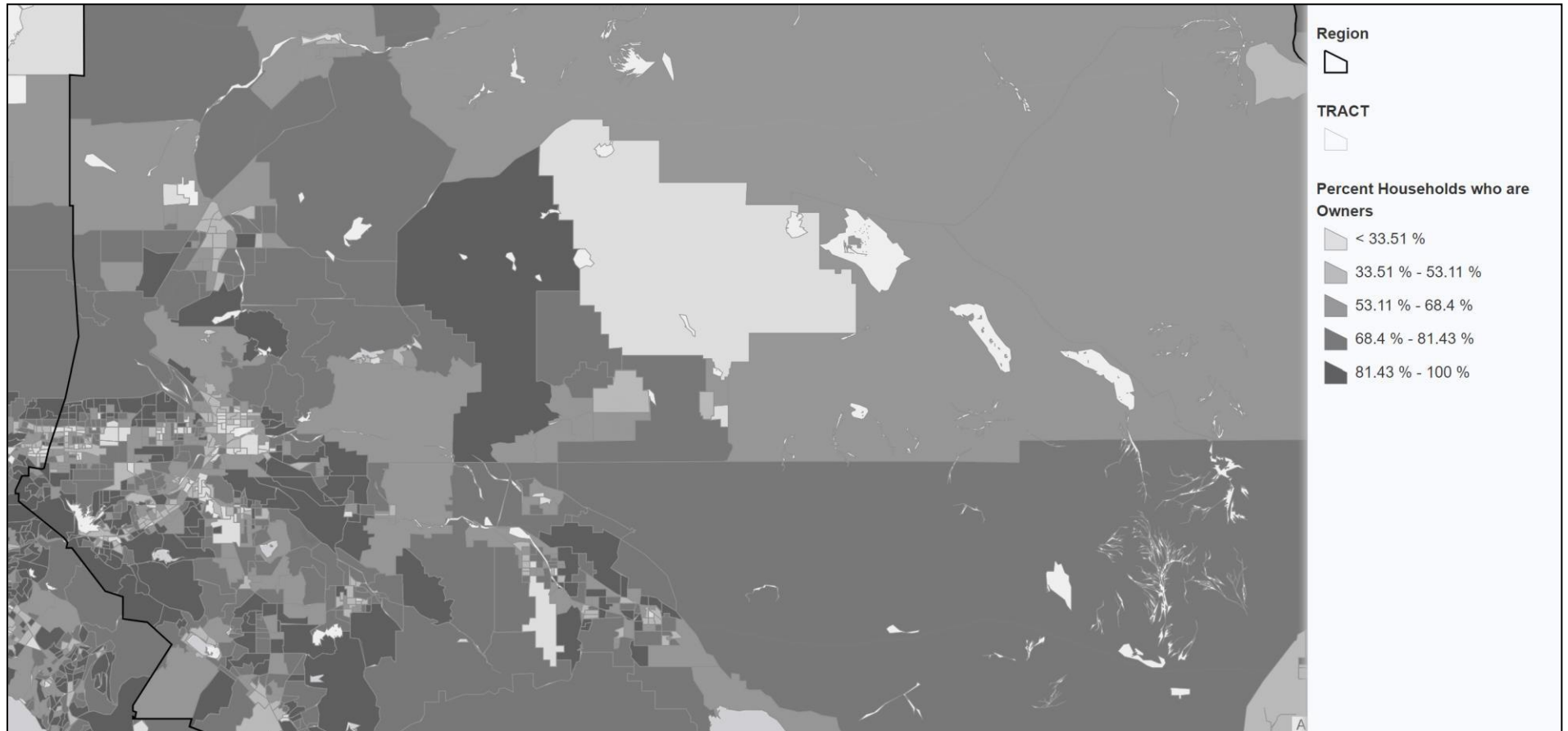
Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 35 – SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 36 – SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies.²⁷ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts Chino Hills for the years 2013 through 2017, which includes a total of 3,629 home purchase loan application records.²⁸ Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

Of total Chino Hills home loan applications, 11.5% were denied by the lending institution. There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 17.5% of home purchase loan denials. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.²⁹ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution’s compliance with fair lending laws.

²⁷ Consumer Financial Protection Bureau. “FFIEC Announces Availability of 2017 Data on Mortgage Lending.” May 7, 2018. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2017-data-mortgage-lending/>

²⁸ Includes applications for the purchase of one-to-four family dwellings (not including manufactured housing) in which the property will be occupied as the owner’s principal dwelling and in which the mortgage will be secured as first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

²⁹ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. “The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act.” Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

Complete information regarding applicant race, ethnicity, and income is available for 3,058 purchase loan applications, about 84.3% of all applications. The largest share of applicants were Asian (57.0%). White applicants made up 25.5% of the pool, followed by Latinos (14.8%). Other groups (African Americans and people of other or multiple races) each made up less than 2% of loan applicants. Looking at Chino Hills' population as of the American Community Survey, White, Asian, and Latino residents each comprise about 30% of the city, with population shares ranging from 29 to 33%. Black residents make up about 5% of the city's population. Comparing these figures to the breakdown of loan applicants indicates that Asian households are considerably more likely to apply for home purchase mortgage loans other groups over the last five years. Latino and African American applicants made up smaller shares of the loan applicant pool than they did the city's population, however, data in Table 14 shows that homeownership rates for Black households are on par with those of other groups within the city. Homeownership rates for Hispanic households are slightly lower (75% compared to 80-84% for other racial and ethnic groups).

Table 14 shows loan approval rates for completed loan applications by race and ethnicity at various income levels.³⁰ Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

Overall, 13.5% of all completed applications were denied. Applicants of color have higher purchase loan denial rates (ranging from 13 to 15%) than White applicants (10.5%). However, two groups – Black applicants and applicants of other races – have very low numbers of completed applications (both under 40) making it difficult to draw strong conclusions about denial rates.

Disaggregating applications by applicant incomes shows that the vast majority of home loan applications were made by middle- or high-income households (95.4%), likely reflecting the higher cost housing available in Chino Hills. At low incomes, about one-quarter of applications were denied. About one-quarter of applications by White and Asian households were denied, compared to 35.3% for Latinos. Only one Black applicant completed an application, which was denied.

At middle and high incomes, denial rates fell to around 13%, although this rate varied by income, race, and ethnicity. High income White and Black applicant had the lowest rates (about 8%), while middle income Black and other race applicants had the highest rates (22-25%). However, these were based on relatively few applications (4 and 9, respectively).

Overall, lending patterns in Chino Hills as shown by the Home Mortgage Disclosure Act data indicate that there may be some differential access to homeownership by race and ethnicity, but does not provide particularly strong evidence of such. Most notable is the scarcity of applications by low income applicants, suggesting that there is very little housing stock in Chino Hills potentially available and affordable to first time homebuyers or low- and moderate-income households.

³⁰ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 150% MFI, and the upper income category consists of applicants with a household income above 150% MFI.

TABLE 14 – LOAN APPROVAL RATES BY RACE AND ETHNICITY IN RIVERSIDE-SAN BERNARDINO-ONTARIO REGION, 2018

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans							
Low Income	Completed Applications	3,107	23	104	31	40	3,305
	Denial Rate	15.0%	34.8%	22.1%	25.8%	22.5%	15.5%
Middle Income	Completed Applications	2,239	11	68	26	29	2,373
	Denial Rate	9.2%	9.1%	11.8%	15.4%	10.3%	9.4%
High Income	Completed Applications	2,642	9	56	22	32	2,761
	Denial Rate	5.6%	22.2%	5.4%	13.6%	6.3%	5.7%
All Applicants	Completed Applications	7,988	43	228	79	101	8,439
	Denial Rate	10.3%	25.6%	14.9%	19.0%	13.9%	10.6%
Home Refinance Loans							
Low Income	Completed Applications	3,110	4	72	19	37	3,242
	Denial Rate	28.3%	25.0%	37.5%	57.9%	37.8%	28.8%
Middle Income	Completed Applications	2,398	6	40	13	31	2,488
	Denial Rate	19.5%	50.0%	32.5%	38.5%	16.1%	19.9%
High Income	Completed Applications	3,206	16	43	14	30	3,309
	Denial Rate	14.8%	50.0%	9.3%	21.4%	30.0%	15.0%
All Applicants	Completed Applications	8,714	26	155	46	98	9,039
	Denial Rate	20.9%	46.2%	28.4%	41.3%	28.6%	21.3%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

Table 15 identifies denial rates by applicant race and ethnicity.

TABLE 15 – LOAN APPROVAL RATES BY RACE AND ETHNICITY IN CHINO HILLS CENSUS TRACTS, 2018

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans							
Low Income	Completed Applications	16	1	86	0	17	120
	Denial Rate	25.0%	100.0%	23.3%	---	35.3%	25.8%
Middle Income	Completed Applications	176	4	500	9	135	824
	Denial Rate	15.3%	25.0%	11.4%	22.2%	11.9%	12.5%
High Income	Completed Applications	466	24	929	25	210	1,654
	Denial Rate	8.2%	8.3%	16.1%	12.0%	11.9%	13.2%
All Applicants	Completed Applications	658	29	1,515	34	362	2,598
	Denial Rate	10.5%	13.8%	15.0%	14.7%	13.0%	13.5%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

The final analysis of HMDA data looks at loan outcomes by census tract. The two maps that follow show number of applications and denial rates by census tract for home purchase loans and mortgage refinance loans.

Zoning, Affordability, and Housing Choice

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”³¹ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

Intersection of Local Zoning with Federal and State Fair Housing Laws

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in conjunction with comprehensive plans. Courts have long recognized the power of local governments to control land use, and the California Constitution and Government Code authorize incorporated counties and cities to regulate land use and zoning within their respective jurisdictions. This general grant of home-rule authority is limited by other state code sections (e.g., the General Code, Health and Safety Code, and Public Resources Code) related to public hearings and procedures; density bonuses and incentives; environmental impact reviews; development impact fees; mediation and resolution of land use disputes; transportation management; affordable housing development approvals; subdivision maps; use of surplus land; supportive housing and residential care facilities, among others. The state’s planning and land use regulations also require that each jurisdiction adopt “a comprehensive, long-term general plan for [its] physical development.” The General Plan is the jurisdiction’s official policy regarding the location of housing, business, industry, roads, parks, and other land uses, protection of the public from noise and other environmental hazards, and conservation of natural resources. The general plan may be supplemented by “community plans” and “specific plans” to guide the land use decisions for particular areas or communities within the jurisdiction and describe allowable land uses, identify open space, and detail the availability of facilities, infrastructure and financing available for the community. The jurisdiction may then adopt zoning or development codes, subdivision codes, and other planning ordinances to carry out the policies of its general plan consistent with other state mandates.³² Chino Hills last adopted a comprehensive update to its General Plan and Zoning Map in 2015.

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a

³¹ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

³² See 2015 General Plan, Ch. 3 Housing Element *available at*: www.chinohills.org/DocumentCenter/View/11275/General-Plan---Final-approved-by-CC-2-14-15-4-21?bidId=

parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the general plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts.³³ In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

In Chino Hills, the Development Code (Title 16 of the Municipal Code) divides the city into 22 primary zoning districts, including 6 exclusively residential districts, and overlay zones (mostly related to environmental resources protection), and describes allowable uses and development standards in each, to implement the long-range planning goals of the General Plan. Three decision-making bodies are responsible for the administration and implementation of the Development Code: City Council, the Planning Commission, and the Community Development Director (with recommendations from the Project Review Committee).

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the California Fair Employment and Housing Act (FEHA) and the Unruh Act, the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. The FHAA prohibits both private individuals and government authorities from denying a member of a protected class equal access to housing, including through the enforcement of a local zoning ordinance that disproportionately limits housing choice for protected persons.

In *Texas Department of Community Affairs v. The Inclusive Communities Project*, a 2015 landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions.

Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes:

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments.

California has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, (the "Fair Housing Act" or "FHA"), known as the *Fair Employment and Housing Act* ("FEHA") (CAL. GOV. CODE § 12900 - 12996). Both the FHA and FEHA prohibit discrimination in

³³ Local government power to regulate land use derives from the State's expressly delegated police power, first to municipal governments and then to counties, as found in the various enabling statutes of the state constitution and Title 7 of the California Government Code, § 65000 *et seq.* State law requires local planning agencies to prepare and "the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city." See Gov. Code § 65300 *et seq.*

the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex (which under the FEHA also includes specifically pregnancy, childbirth, breastfeeding or medical conditions related to pregnancy, childbirth or breastfeeding), race, color, disability (physical and mental), religion, national origin, or familial status (families with children). California has a broader definition of “disability” than federal civil rights acts. In California, disability includes physical or mental impairments that “limit a major life activity” as opposed to the federal definition which requires that the disabling condition “*substantially* limit” one or more major life activities. The FEHA also expands on the classes of persons protected against discriminatory housing practices to also prohibit discrimination in housing based on gender, gender identity, and gender expression, sexual orientation, marital status, age, source of income, genetic information, and retaliation for protesting illegal discrimination, or “or any other basis prohibited by Section 51 of the Civil Code,” which also includes as a basis of protection medical condition, citizenship, primary language, and immigration status.

“Source of income” is defined narrowly under the FEHA as “lawful, verifiable income paid directly to a tenant or paid to a representative of a tenant” and under the definition “a landlord is not considered a representative of a tenant.” Accordingly, source of income under the FEHA has been adjudged to not include government rent subsidies, specifically Housing Choice Vouchers under Sec. 8 of the FHA. While the FEHA does not prevent a landlord from refusing to accept tenants who rely on Section 8 vouchers, the California Court of Appeals has found that a local ordinance that specifically protects against discrimination based on a tenant’s participation in the Section 8 program is not preempted by the state law. While there is movement among California jurisdictions to adopt greater protections for tenants utilizing housing subsidies or vouchers, as the number of voucher holders sometimes far outnumbers available rental units participating in the voucher program in an area, Chino Hills has not adopted a local ordinance to do so.

The FEHA prohibits discrimination and harassment in all aspects of housing, including sales and rentals, evictions, terms and conditions, mortgage loans and insurance, and land use and zoning. California’s fair housing law has fewer exemptions than its federal counterpart. An owner-occupied single-family home, where the owner does not rent to more than one individual (as opposed to owner-occupied buildings with no more than four units under the FHA), *and* the owner complies with FEHA’s prohibition against discriminatory statements, notices, or advertisements is one of the few exemptions under the FEHA. Exemptions also apply to housing operated by organizations and private clubs that limit occupancy to members, and statements indicating a preference for same-sex roommates in shared living situations. The FEHA explicitly prohibits discriminatory “public or private land use practices, decisions and authorizations” including, but not limited to, “zoning laws, denials of permits, and other [land use] actions . . . that make housing opportunities unavailable” to protected groups. Like the FHA, it requires housing providers to make reasonable accommodation in rules and practices to permit persons with disabilities to use and enjoy a dwelling and to allow persons with disabilities to make reasonable modifications of the premises.

Under California’s Unruh Civil Rights Act, all persons are entitled to full and equal accommodations, advantages, facilities, privileges, or services in all “business establishments,” including both private and public entities. The Unruh Act has been consistently construed to apply to rental housing, and is an additional claim often averred in housing discrimination cases. The Unruh Civil Rights Act protects all persons against arbitrary and unreasonable discrimination by a business establishment.

Despite state law generally leaving zoning and land use regulations to local decision-making, the FEHA explicitly preempts any local ordinance that conflicts with the categories of housing discrimination specifically set forth in the statute. Chino Hills has not adopted a local nondiscrimination ordinance or expanded on the rights and obligations already guaranteed by the FEHA or Unruh Civil Rights Act.

City of Chino Hills Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

Chino Hills's treatment of these types of issues, mainly through its Development Code, is explored and evaluated in Table 16 and the narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning and land use ordinances of the City were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within the jurisdiction and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and the scores for each issue.

TABLE 16 – ZONING CODE RISK SCORES

Issue	Risk Score
1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive? 1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?	1
2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.? 2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?	1
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements? 3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?	1
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	1
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	2
6a. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts? 7b. Do multi-family districts restrict development only to low-density housing types?	2
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	1
9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction? 9b. Is there any provision for monitoring compliance?	1

10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2
Average Risk Score	1.4

The City's average risk score (calculated by taking the average of the 10 individual issue scores) is 1.4, indicating that overall there is low risk of the development code and other land use regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the development code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. Remarkably, the City did not receive a "3" (high risk) score on any of the ten issues evaluated, and received a "2" (medium risk) score on only several issues where the development standards may have the potential to negatively impact fair and affordable housing or where the jurisdiction could take affirmative action to further reduce barriers to fair and affordable housing. While Chino Hills's development code does not put the City in jeopardy of violating the minimum fair housing and AFFH standards as they relate to local government land use regulations and policies, even well-scoring jurisdictions may find there are incremental improvements to be made to rules and policies to more fully protect the fair housing rights and housing choice of all of their residents and to better fulfill the mandate to affirmatively further fair housing.

Research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the City's code creates a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law. This latter subject is discussed in Chapter 8 of this report.

Impact of Zoning Provisions on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more

expensive, i.e. less affordable.³⁴ Exclusionary zoning is understood to mean zoning regulations which impose unreasonable residential design regulations that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes and prevent overcrowding. Zoning policies that impose barriers to housing development by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units.

Although these land use regulations may not be in direct violation of fair housing laws, or facially discriminatory, they may have the effect of artificially limiting the supply of housing units in a given area and disproportionately reducing housing choice for moderate- to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive. Legitimate public objectives, such as maintaining the residential character of established neighborhoods, environmental protection, or public health, must be balanced with housing needs and availability.

Chino Hills is a hillside community with a land area of 26,799 acres. Of that area, over 45% is designated permanent open space. About 12,600 acres or 47% of Chino Hills's land area is designated for residential development. Of those residential acres, 30% is designated for low density residential, 7% is designated for medium, high and very high density residential. The balance of the residential acreage, 63%, is hillside residential property with an average topography of 20-40% slopes, making high density development prohibitive. However, the code does allow clustering in these hillside zones. For all its residential zones regardless of density, Chino Hills emphasizes high quality development. For all its residential zones regardless of density, Chino Hills also provides a variety of mechanisms to accommodate density and development standard flexibility. These mechanisms include: clustering, small lot overlays, PD development, Specific Plan development, mixed use development and density bonuses.

Examples of single family residential zones that have smaller minimum lot size requirements include: R-S-1 (Hunters Hill) permits single-family detached residences at a density of up to 2.3 dwelling units per gross acre on minimum 5,000 sq. ft. lots; R-S-2 (Richland Highlands) permits single-family detached residences at a density of up to 3.54 dwelling units per gross acre on minimum 5,000 sq. ft. lots; R-S-3 (Galloping Hills) permits single-family detached residences at a density of up to 3.1 dwelling units per gross acre on minimum 4,200 sq. ft. lots; R-S-4 (Montefiore) permits single-family detached residences at a density of up to 6.16 dwelling units per gross acre on minimum 4,200 sq. ft. lots; R-S-5 (Inverness) permits single-family detached residences at a density of up to 3.91 dwelling units per gross acre on minimum 5,000 sq. ft. lots; R-S-6 (Seville Knolls) permits single-family detached residences at a density of up to 6.63 dwelling units per gross acre on minimum 3,300 sq. ft. lots; R-S-7 (Gordon Ranch) permits single-family detached

³⁴ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, *A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index* (2007), available at real.wharton.upenn.edu; Randal O'Toole, *The Planning Penalty: How Smart Growth Makes Housing Unaffordable* (2006), available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, *The Impact of Zoning on Housing Affordability* (2002), available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's *Housing Development Toolkit*, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

residences at a density of up to 1.53 dwelling units per gross acre on min. 4,200 sq. ft. lots; and R-S-8 (Van Daele) permits single-family detached residences at a density of up to 2.7 dwelling units per gross acre on minimum 6,000 sq. ft. lots. Greater flexibility, increased density, and other housing types also may be permitted through the Planned Development permit process which is applicable in many zoning districts for single family or mixed-residential developments, but which requires a minimum 25+ acre site area.

While the development code permits smaller lots in PD areas and some R-S subdistricts, the majority of residential land, approximately 26.8%, is designated Agriculture/Ranch (AR). These AR areas contain steep slopes and limited road access and infrastructure, and are therefore only suitable for either large lot or clustered single family development. These areas of steep slopes are designated by the City Zoning Map primarily as Agriculture/Ranch and carry development controls related to setbacks, maximum height, lot coverage, height restrictions, off-street parking, design requirements and review, and minimum floor areas. Chino Hills received a score of 2 (indicating “medium risk”) on Issue 6 of the matrix because there are opportunities for less regulation and greater flexibility to encourage more affordable housing development.

Although only a small portion of residential acreage in the City permits 2-family, 3-family, or multifamily dwellings (approximately 9% of residential acreage as of the 2015 General Plan), where permitted, the zoning resolution makes possible reasonable development of multifamily units at varying density allowances in the Medium Density RM-1, High Density RM-2, Very High Density RM-3, Mixed Use, and Commercial zoning districts.

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported

housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.³⁵

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to

THE CITY OF CHINO HILLS CONTAINS
NO PUBLIC HOUSING UNITS. THERE
ARE 5 HOUSING CHOICE VOUCHERS IN
USE IN THE CITY.

³⁵ Department of Housing and Urban Development. Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.³⁶ The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.³⁷ This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

Supply and Occupancy

The City of Chino Hills does not contain any publicly assisted housing units, to include low-income housing tax credit-financed developments. Additionally, Housing Choice Vouchers, which tenant households can use to subsidize their rental housing costs in communities across San Bernardino County, are used at very low rates in Chino Hills. Table 17 indicates that there are only 5 Housing Choice Vouchers currently in use in the city. Throughout the region, publicly supported housing is offered through the Housing Authority of the County of San Bernardino, the Housing Authority of the County of Riverside and other small public housing authorities. The greatest number of publicly supported housing types in the region are Housing Choice Vouchers (20,519 units) and LIHTC (26,114 units). The nearest publicly supported housing developments are found in the adjacent cities of Chino in San Bernardino County and Corona in Riverside County.

³⁶ Dawkins, Casey J. Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

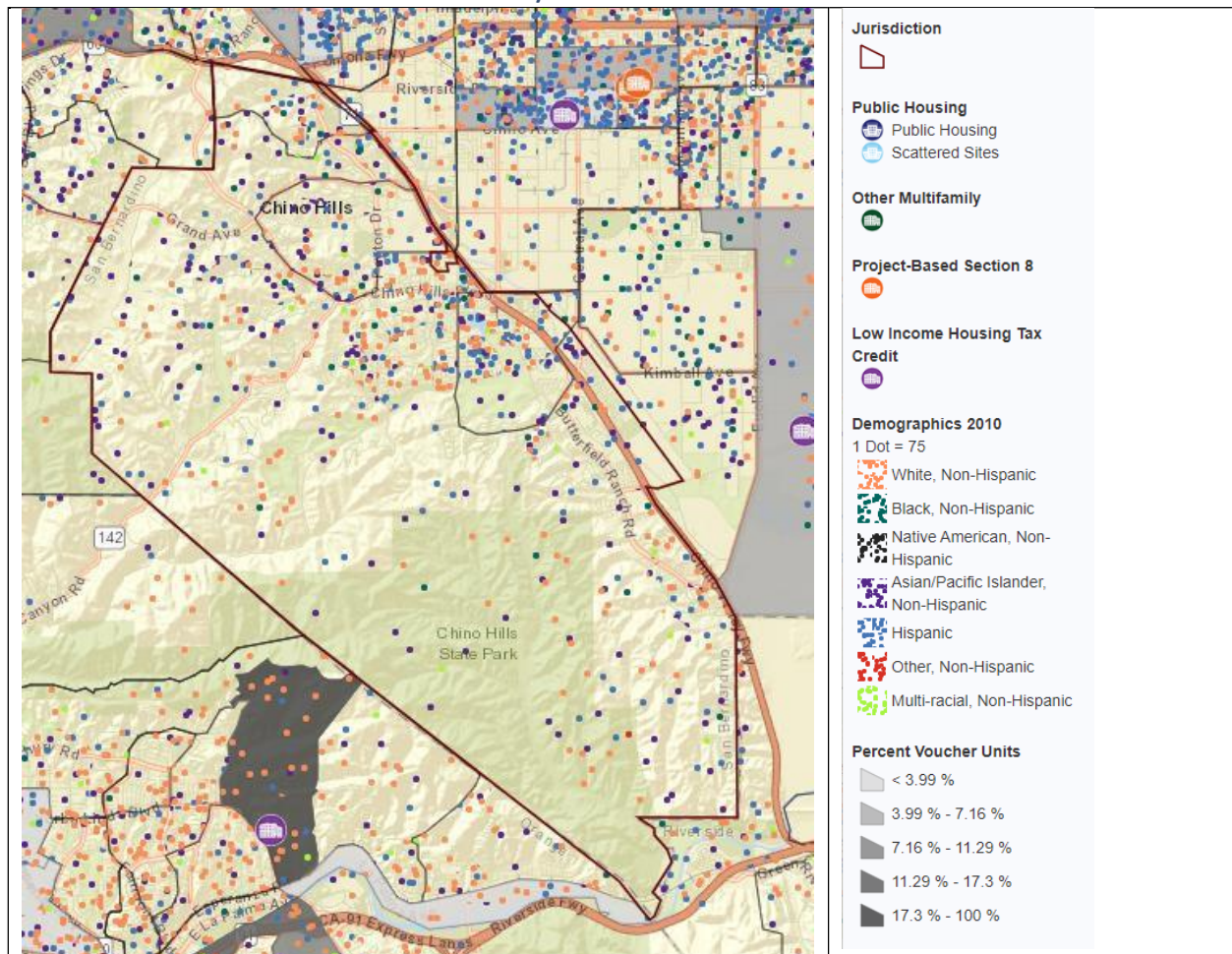
³⁷ Galvez, Martha M. What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

TABLE 17 – PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	City of Chino Hills		Riverside-San Bernardino-Ontario Region	
	#	%	#	%
Total housing units	25,145	-	1,538,604	-
Public housing	0	0.0%	270	<0.1%
Project-based Section 8	0	0.0%	5,454	0.3%
Other multifamily	0	0.0%	2,273	0.1%
HCV program	5	<0.1%	20,519	1.3%
LIHTC program	-	-	26,114	1.7%

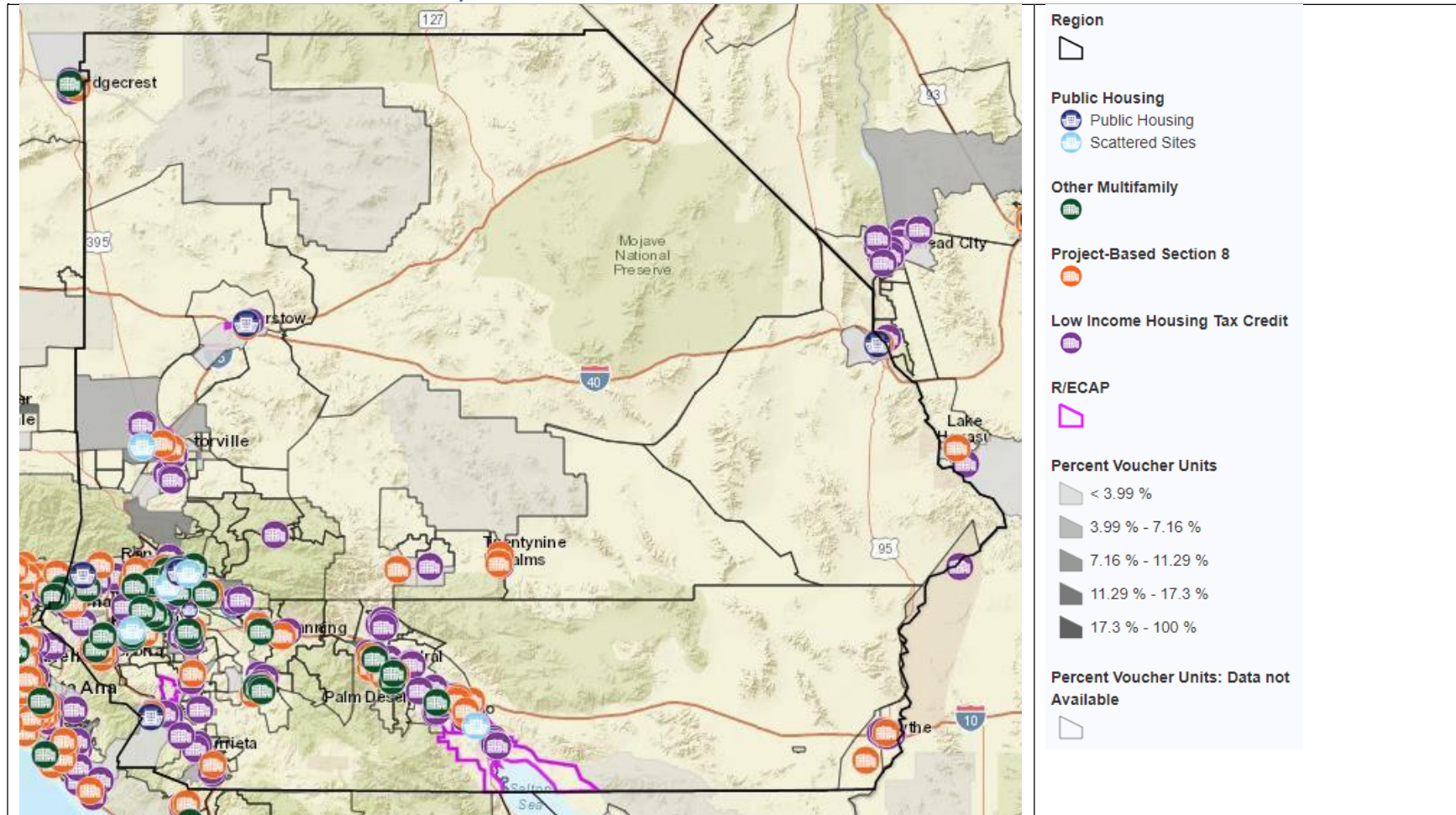
Source: 2017 ACS Estimates, Table B25001; HUD Picture of Subsidized Households; HUD User LIHTC Database

FIGURE 37 – PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 38 – PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Policy Review

Residents of Chino Hills are served by the Housing Authority of the County of San Bernardino (HACSB). The HACSB is part of HUD's Moving to Work demonstration project, which allowed 39 housing authorities to use their operational funds flexibly to create new publicly supported housing opportunities. The HACSB administers approximately 13,000 housing units.³⁸ As part of the Moving to Work Demonstration project, the HACSB produces an annual Moving to Work plan and report. The HACSB must also abide by programmatic policies as outlined in the "Public Housing Admissions and Continued Occupancy Policies" or ACOP.³⁹ The selection process for tenants in publicly supported housing is described below.

Tenant Selection Process

Applicants for affordable housing programs must be at least 18 (or emancipated), meet Section 214 citizenship criteria, complete a background check, and have gross income not to exceed federal income limits per person. Applicants must apply for housing in person or by mail.

The HACSB operates 3 types of affordable housing programs:

- Streamlined Fixed Lease Assistance for Elderly/Disabled Families
- Streamline Tiered Lease Assistance for Career Focused Families
- Transitional Assistance for Moving to Work Families

Applicants to the Streamlined Fixed Lease Assistance program for Elderly or Disabled Families must have at least one head of household who is 57 or older or disabled. The Transitional Assistance for Moving to Work Families is a program serving tenants who have spent almost 5 years in publicly supported housing. Some applicants may have to meet credit or rental history criteria.

After the authority reviews each application, eligible families will be placed on a waiting list for housing. The HACSB places families on the waiting list based on bedroom size. Ineligible families are removed from the waitlist but may contest their determination of ineligibility in an in-person interview.

In selecting families for housing, the HACSB uses local preferences to give priority to certain family types. Preferred family types include homeless families, veteran families and families that already reside in San Bernardino County. The authority must also abide by strict HUD rules. Forty percent of admitted families must be extremely low income; a cumulative total of 75% must be very low income. The authority must also strive to deconcentrate poverty through its housing placements. Higher-income tenants are placed in lower income areas, and lower income tenants must be placed in higher income areas. Families are selected by preference. If two families meet the same preference criteria, families will be served in the order that their application was received or based on how well they fit the features of the available housing unit.

Once families are selected for housing, they must participate in an eligibility interview. At the interview, the head of household must bring all pertinent documents to demonstrate eligibility for housing. The

³⁸ Housing Authority of the County of San Bernardino. "Who We Are Fact Sheet."
<http://ww2.hacsb.com/files/pdf/news-reports/fact-sheets/hacsb-who-we-are-2019.pdf>

³⁹ Housing Authority of the County of San Bernardino. "Public Housing Admissions and Continued Occupancy Policies."
<http://www.hacsb.com/files/pdf/public-housing/acop-sept-9-14-board-approved-clean.pdf>

HACSB verifies the income of the applicants using a hierarchy of review methods called the “Simplified Income Determination.”⁴⁰ In order of preference, these methods include income verification using HUD’s online system called Enterprise Income Verification, documentation of income from the applicant, third-party written verification and third-party oral verification. Assets are not counted against an applicant’s income as they enter the program. However, new income from employment for any tenant (other than full-time students) can be counted toward their rent calculation. Other types of income such as foster care income, adoption income and TANF are also included in rent calculations.

Once the authority has reviewed a family’s eligibility documents, it will make a final determination of eligibility in writing. The HACSB makes a one-time offer on the housing unit suitable for that family, which the applicant must accept within 3 business days.

The ACOP speaks largely to the selection process for project-based or public housing units, not housing choice vouchers. For housing choice voucher recipients who must identify their own housing, it may be difficult finding a unit that will accept their voucher. The HACSB reports that search times of 120 days, or approximately 4 months, are not unusual. Due to the long search times, the HACSB may select recipients from the waiting list earlier in their process than usual so that recipients will have time to find housing. As of 2018, the housing choice voucher waitlist was closed. However, project-based vouchers, vouchers at RAD sites, and public housing waitlists were still partially open. When waiting lists re-open the authority must publish the opening dates in local newspapers at least 10 business days prior to opening.

The authority uses local market rents to determine the assistance given to tenants instead of HUD’s published fair market rents. By using local rental rates instead of HUD estimates, the HACSB’s program is better able to subsidize rents in higher-cost areas such as Chino Hills. Based on their enrolled program, tenants in publicly supported housing pay a percentage of their gross income as rent. Tenants in the Term-Limited Assistance Program typically participate for five years but may be extended to seven years with a hardship extension. Tenants pay 30% of their gross income as rent and are subject to be transitioned out of housing if their gross income exceeds 80% AMI. Participants in the Streamlined Lease Assistance Program may pay 24% of their gross income if there is an elderly or disabled householder. Households that do not have an elderly or disabled householder may pay 30% of their income, which increases 3% at each recertification up to 36%. The minimum rent for tenants in the County’s publicly supported housing is \$125.

⁴⁰ Housing Authority of the County of San Bernardino. “2018 Moving to Work Annual Report.”
<http://ww2.hacsb.com/files/pdf/news-reports/mtw/reports/hacsb-2018-annual-mtw-report-122118.pdf>

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the Census Bureau, 19% of the U.S. population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.⁴¹

ADOPTING A REASONABLE
ACCOMMODATION ORDINANCE IS ONE
WAY TO ADDRESS LAND USE
REGULATIONS' IMPACT ON HOUSING
FOR PERSONS WITH DISABILITIES.

CHINO HILLS ADOPTED A REASONABLE
ACCOMMODATION ORDINANCE IN
2008 OUTLINING THE FORMAL
PROCEDURE BY WHICH A PERSON
WITH A DISABILITY (OR
REPRESENTATIVE OR HOUSING
PROVIDER OF HOUSING FOR PERSONS
WITH DISABILITIES) MAY REQUEST,
AND BE PROVIDED, REASONABLE
ACCOMMODATION.

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.⁴²

Residential Patterns

In the City of Chino Hills, an estimated 6,517 persons have a disability, representing 8.1% of the total population. People aged 18-64 have the highest disability rate (4.5%), and the rate for those over 65 is 3.4%. In contrast, 0.2% of children under 18 are disabled. These rates of disability fall slightly below the rates in the wider Riverside-San Bernardino-Ontario MSA (see Tables 18 and 19).

⁴¹ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

⁴² America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

Ambulatory disabilities are the most common type in both the city and the region affecting 4.4% of population in Chino Hills and 6.7% of the region. Independent living difficulties are the next most common disability in the city (4%), followed by cognitive difficulties (3.3%), hearing difficulties (2.5%), vision difficulties (1.9%) and self-care difficulties (1.5%). Like Chino Hills, independent living and cognitive difficulties are also second most prominent in the region (affecting 4.6% and 4.3% respectively), while vision difficulties are least common (affecting 2.3%).

Figure 39 shows the geographic distribution of persons with disabilities by age in Chino Hills. The adult and senior populations with disabilities are relatively well dispersed among the developed areas of the city, with minor clustering south of Chino Hills Parkway. Children with disabilities are found most frequently in these same cluster areas, specifically in the Los Serranos neighborhood and those neighborhoods accessed by Rolling Ridge Road and Glen Ridge Drive.

Transit access and walkability are highly attractive opportunity features for people with many different types of disabilities who are limited in their ability to drive. These central areas of the city where persons with disabilities show minor clustering benefit from access to transit. The OmniGo Route 365, serving Chino Hills and Chino, offers hourly fixed-route bus service. Local OmniGo stops include the Shoppes at Chino Hills, Chino Hills City Hall, Chino Hills Marketplace and three high schools. OmniGo 365 also connects to OmniTrans Route 88, which provides access to the Chino Transit Center, Chino Civic Center, and the Montclair Transit Center. While persons with disabilities living south of Chino Hills Parkway have relatively lower levels of labor market engagement and higher rates of poverty than other places in the city, these areas have increased proximity to jobs.

TABLE 18— DISABILITY BY TYPE

Disability Type	City of Chino Hills		Riverside-San Bernardino-Ontario Region	
	#	%	#	%
Hearing difficulty	1,980	2.5%	141,859	3.2%
Vision difficulty	1,507	1.9%	104,425	2.2%
Cognitive difficulty	2,711	3.3%	195,919	4.4%
Ambulatory difficulty	3,565	4.4%	282,035	6.2%
Self-care difficulty	1,206	1.5%	116,519	2.6%
Independent living difficulty	3,227	4.0%	207,366	4.4%

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

Source: 2017 ACS, Table K201803

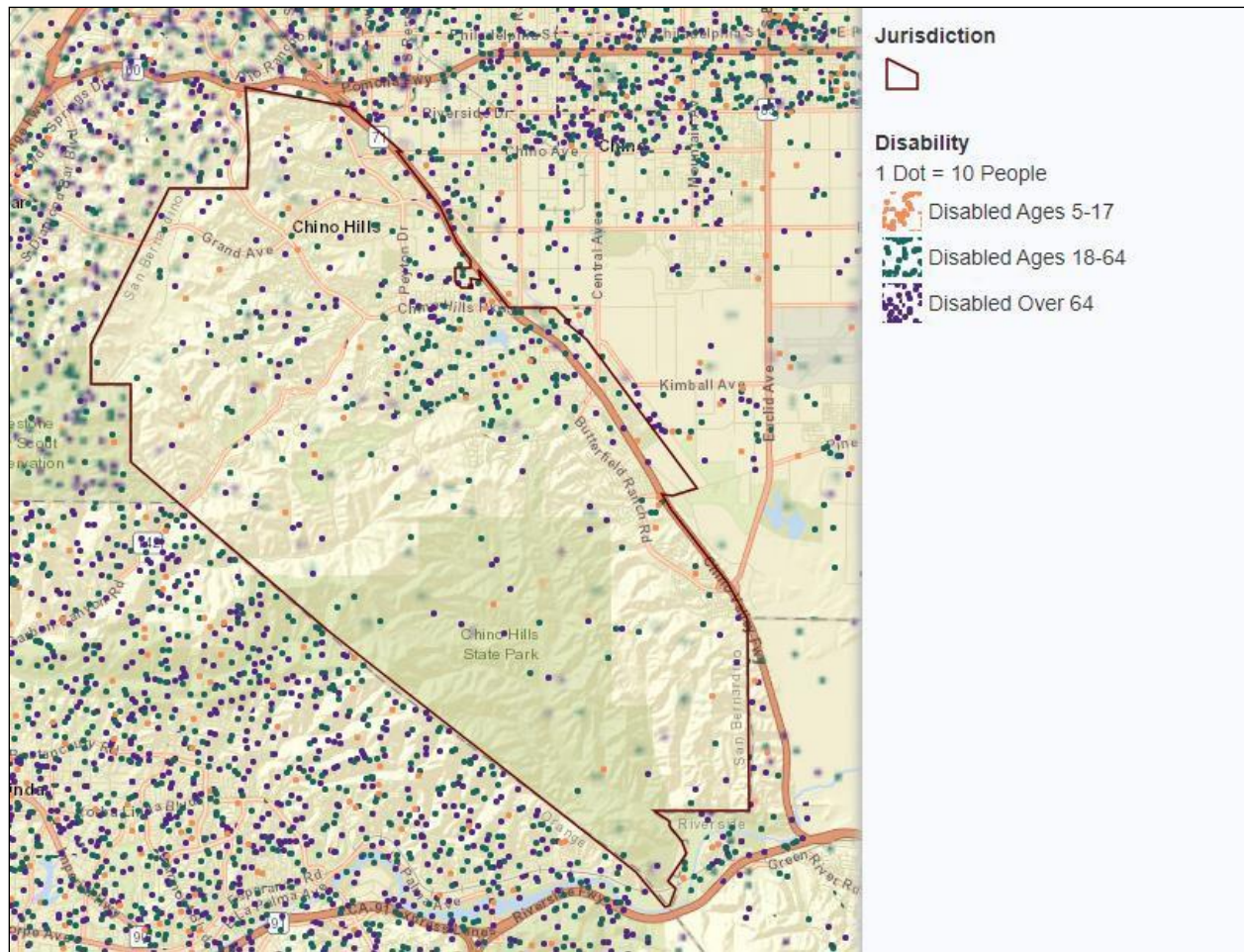
TABLE 19 – DISABILITY BY AGE GROUP

Age of People with Disabilities	City of Chino Hills		Riverside-San Bernardino-Ontario Region	
	#	%	#	%
Age 5-17 with disabilities	152	0.2%	38,288	0.9%
Age 18-64 with disabilities	3,633	4.5%	268,397	5.9%
Age 65+ with disabilities	2,732	3.4%	217,833	4.8%

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

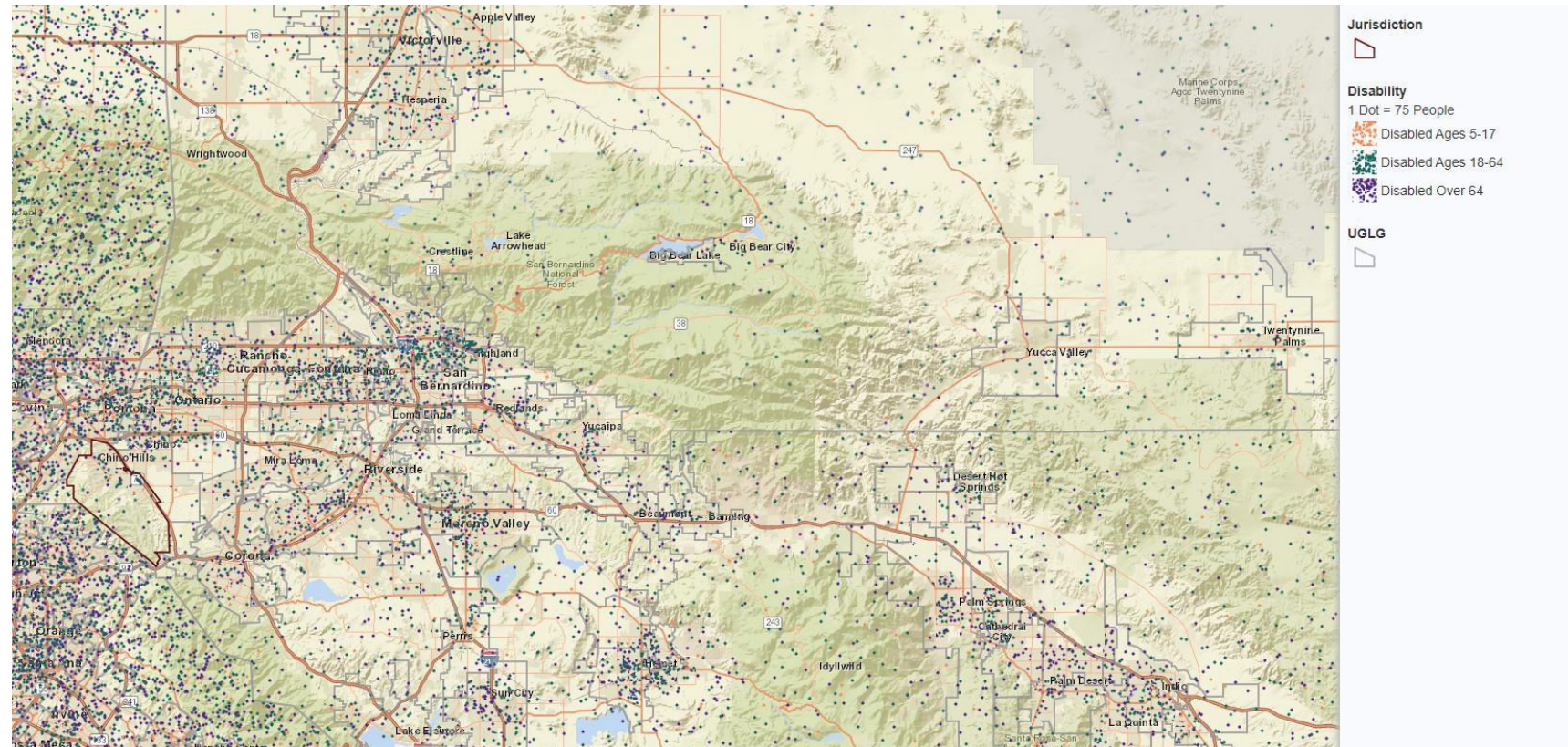
Source: 2017 ACS, Table K201801

FIGURE 39 – PEOPLE WITH A DISABILITY BY AGE IN THE CITY OF CHINO HILLS



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 40 – PEOPLE WITH A DISABILITY BY AGE IN THE RIVERSIDE-SAN BERNARDINO-ONTARIO REGION



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Accessible Housing Supply and Affordability

A search using HUD’s Resource Locator was conducted to identify affordable rental properties in the City of Chino Hills designed to serve people with disabilities. The search did not return any results within the city limits, however the Oakmont and Strathmore assisted living facilities in Chino Hills both have affordable unit set-aside requirements connected to funding they have received. A search of San Bernardino County returned 21 properties providing affordable elderly and special needs housing in the county. Of the sites listed, the City of San Bernardino has the greatest number of affordable elderly and special needs sites (7), Fontana has 3, and several other cities such as Chino, Montclair, Redlands and Rialto have 1-2 sites.

Based on a 2019 standard Supplemental Security Income (SSI) payment of \$783 per month (equating to an affordable rent of \$261 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities. Table 20 below shows that persons with disabilities are able to access publicly supported housing in several locations across the County of San Bernardino. The City of Chino Hills does not currently offer publicly supported units.

TABLE 20 – DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	People with a Disability			
	City of Chino Hills		San Bernardino County	
	#	%	#	%
Public Housing	-	-	82	12.8%
Project-Based Section 8	-	-	520	9.9%
Other Multifamily Housing	-	-	73	3.3%
HCV Program	-	-	5,235	27.5%

Note: The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Zoning and Accessibility

Fair housing laws do not preempt local zoning laws but do apply to municipalities and units of local government and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. This includes a local government's affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy housing. It also includes the affirmative obligation not to segregate housing for protected classes into lower-opportunity, less desirable areas of the jurisdiction. Even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities accept an obligation to set and implement standards and policies that protect and advance fair housing choice for all. The Development Code's potential effects on accessibility are assessed in the following section. Several elements of this analysis refer back to the scored code review presented in Chapter 6.

Definition of "Family" and Group Housing for People with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling as a means of preserving the stable, traditional, and residential character of their neighborhoods. Unreasonably restrictive definitions may have the unintended consequence (or intended consequence, depending on the motivations behind the drafting of the jurisdiction's definition) of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations.

The City's Municipal Code does not specifically define "family" (or "housekeeping unit," "household," or similar term)⁴³ and do not put a cap on the number of unrelated persons who may reside in a single family dwelling (other than the limits imposed by the housing/building safety codes). Rather than an arbitrary limit under the development code, maximum occupancy is regulated more as a matter of safety under the housing/building and fire codes. Accordingly, Chino Hills received a score of 1 (indicating "low risk") on Issue 1 of the zoning code review because a definition of "family" is not used or applied in a manner that would treat differently or limit the housing choices of unrelated individuals with disabilities (or members of any other protected class) living together.

Regarding housing for persons with disabilities, including those recovering from alcohol or drug abuse, the City received a score of 1 ("low risk") on Issue 2 and score of 2 ("medium risk") on Issue 5 of the matrix. As long as the housing for persons with disabilities otherwise meets the development code's standards for single-family housing such housing should be permitted in the same manner as other single-family housing regardless of the number of unrelated persons residing there. Chino Hills follows California's directives under the state Health and Safety Code, which preempts local zoning rules, to protect housing for persons with disabilities from exclusionary zoning criteria. State law (HSC §§1500 et seq.) requires that *licensed* community care facilities serving six or fewer persons be: (1) treated as a

⁴³ City Ordinances 91-01 and 92-02 adopted the San Bernardino County Code ("County Code") wherever such County Code did not conflict with the provisions of the Chino Hills Municipal Code. The County has a permissive definition of "family," defining family in terms of a "single housekeeping unit" rather than an arbitrary number of persons. A single housekeeping unit under the County's definition means that the occupants, whether related or unrelated, live together as a functionally equivalent traditional family, sharing joint use of and responsibilities for the household. These definitions are not facially discriminatory against any protected class.

residential use, (2) allowed by right in all residential zones, and (3) treated the same with respect to regulations, fees, taxes, and permit processes as other residential uses in the same zone, whether or not the facility actually functions as equivalent to the local jurisdiction's definition of "family" or "single housekeeping unit." Occupancy of these facilities or dwellings is limited only by building code requirements. This protection applies to community care facilities for persons with disabilities, to residential care facilities for the elderly (§§ 1569.84 et seq.), to alcoholism or drug abuse recovery or treatment facilities (§§ 11834.22 et seq.), and to congregate care facilities (§§ 1267.16. et. seq.).

Chino Hills's Development Code includes specific definitions for the terms "group home," "supportive housing," and "community care facility" which may serve the housing needs of persons with disabilities. Licensed group homes (for 6 or fewer residents), residential care facilities for the elderly, supportive housing, and transitional housing are expressly permitted by right in all the residential zoning districts (R-A, R-R, R-S, RM-1, RM-2, and RM-3) subject to the same site plan review process as traditional housing. "Community care facility" is not otherwise listed in the development code's permitted use table.

The Department of Justice has taken the position in a recent case against the City of San Jacinto, California that it is unlawful for a municipality to impose numerical occupancy limits on group housing for unrelated persons with disabilities that is more restrictive than numerical occupancy limits for related families or other unrelated persons.⁴⁴ Because Chino Hills does not impose a cap on the number of nondisabled, unrelated persons who may occupy a single family residence and be presumed to be living as a "family" or single housekeeping unit (other than limits imposed by the housing/building safety codes), the municipality cannot impose a cap or arbitrary limit as an additional zoning requirement on housing for persons with disabilities because of their disability. The state's rule that licensed group homes of up to 6 residents must be permitted in single family zoning districts does not mean that group homes of more than 6 residents must necessarily be excluded or subject to restrictions not imposed on housing for an equal or greater number of persons without disabilities. Just as Chino Hills has chosen the housing/building code as the proper model for regulating the number of residents in a dwelling rather than an arbitrary number under a "family" definition, the housing/building code is the proper vehicle for regulating the number of residents in a group home or supportive housing, not the zoning ordinance.

The Code identifies residential and supportive uses by size. According to the City's Land Use Matrix, supportive and transitional housing for 7 persons or more are not permitted uses in the single family R-A, R-R, and R-S districts, while other single family dwellings, "group homes (6 persons or fewer)", and "supportive housing (6 persons or fewer)" are. City staff reports that supportive and transitional housing for 7 persons or more are permitted through a staff level review.

As for Issue #4 of the zoning code review, the City Development Code does not regulate concentrations of housing for persons with disabilities or contain specific site planning criteria for these uses. Applications for group homes, regardless of the size, are processed through the site plan approval process and any group home will be regulated by the zoning district in which it is located. The City received a score of 1 ("low risk") on this issue.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations' impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or

even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation. Examples of a reasonable accommodation request may be simple such as a modification of the setback or lot coverage requirements to allow an external mobility ramp; modifying existing indoor space for accessible design features; parking changes; allowing more unrelated residents in a group home than the definition of “family” would typically permit; or more complicated like allowing a care home in a particular neighborhood or within a restricted distance to another facility without subjecting the applicant to the costly, time-consuming, and unpredictable special use permit or variance process.

The FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation, and accordingly many local jurisdictions across the country apply their respective zoning code’s variance or special use permit procedure to evaluate and process requests for reasonable accommodation. Variance and special permit procedures are imperfect models for processing reasonable accommodation requests because: (1) they generally require a showing of special circumstances or conditions applying to the land rather than to the individual’s special circumstances or condition due to a disability that affects his or her ability to use and enjoy the dwelling and (2) they subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome.

California recognized these issues as barriers to housing for persons with disabilities and in 2011, the State Attorney General recommended that cities and counties implement standardized fair housing reasonable accommodation procedures to comply with their affirmative duty to fair housing and to meet the requirements of the Housing Element of the General Plan, that mandates that local governments “remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities.”

Chino Hills adopted a Reasonable Accommodation Ordinance in 2008 outlining the formal procedure by which a person with a disability (or representative or housing provider of housing for persons with disabilities) may request, and be provided, reasonable accommodation when reasonable accommodation is warranted from the various City laws, rules, policies, practices and/or procedures, including land use and zoning regulations. The Director of Community Development has the authority to consider and act on any application for a “minor reasonable accommodation” (meaning a deviation from the rules which can be removed or terminated in 90 days or less after the need for the reasonable accommodation ends. The Planning Commission has decision authority over “major reasonable accommodation” requests (meaning a deviation resulting in a physical modification to the property which cannot be restored or terminated within 90 days or less after the reasonable accommodation is terminated) following the public notice and hearing process. A reasonable accommodation does not require approval of any variances but may be subject to conditions. The ordinance includes criteria for the City to consider in making its determination.

CHAPTER 9.

FAIR HOUSING ACTIVITIES

Fair Housing Resources

California's fair housing protections contained within the Fair Employment and Housing Act ("FEHA") meet or exceed federal standards contained within the federal Fair Housing Act (the "Fair Housing Act" or "FHA"). Accordingly, HUD has certified the FEHA as "substantially equivalent" to the substantive rights, procedures, remedies, and judicial review processes of the FHA, which makes California eligible for annual funding through the Fair Housing Assistance Program (FHAP) for fair housing enforcement activities and programs. The California Department of Fair Employment and Housing, created by the state legislature and certified by HUD as a participating agency, partners with HUD to enforce federal and state fair housing laws.

THE CITY OF CHINO HILLS HAS RESOURCES AND PROCEDURES FOR FAIR HOUSING ENFORCEMENT.

Under its Fair Housing Initiatives Program (FHIP), HUD also awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws. For FY 2018, HUD awarded Inland Fair Housing and Mediation Board (IFHMB), which serves the City of Chino Hills, an Education and Outreach Initiatives (EOI) grant of \$125,000 to use towards educating the public and housing providers about their rights and responsibilities under federal, state, and local fair housing laws.

The EOI grant announced in April 2019 is in addition to a multiyear Private Enforcement Initiatives (PEI) grant of \$300,000 awarded to IFHMB in FY 2016 to carry out testing and enforcement activities. Inland Fair Housing has pledged to use its grant to continue the enforcement work of its previous multi-year grant including matched-pair testing and referrals of systemic discrimination cases to HUD for additional review and enforcement. IFHMB also will investigate three pattern-and-practice housing discrimination cases in a region that ranks in the top 10 of the FBI's Mortgage Asset Research Institute report for predatory housing discrimination activity.

Fair Housing Lawsuits and Complaints

An individual in Chino Hills who believes he or she has been the victim of an illegal housing practice under the FHA or FEHA may seek assistance from the California Department of Fair Employment and Housing (DFEH) or file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local FHAP agency for investigation, conciliation and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency's

closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because the DFEH is a certified FHAP agency, most complaints filed with the HUD FHEO office will be referred back to the DFEH for investigation and enforcement.

The California FEHA provides an alternative procedure to the administrative complaint process. Persons who believe they have experienced housing discrimination may file a pre-complaint inquiry with the DFEH. The Department accepts cases based on possible violations of the FEHA, the Unruh Civil Rights Act, the Ralph Civil Rights Act, the Disabled Persons Act, and the federal FHA under a work-sharing agreement with HUD. Complaints must be filed with DFEH within one year from the date of the alleged discriminatory act. If the investigator determines that the complaint meets the criteria for federal dual-filing status, the complaint will be assigned a federal identification number as well. Complaints originally filed with DFEH that are dual-filed with HUD are investigated by DFEH. During the investigation phase, DFEH has the authority to issue subpoenas and take depositions. If the investigation does not show a violation of the law, DFEH will close the case. Before DFEH issues a finding, it may facilitate voluntary dispute resolution through conciliation or mediation. After DFEH issues a merit finding, the opposing parties are required to participate in mandatory dispute resolution. A no-fault resolution can be negotiated at any time during the process. If dispute resolution fails, the DFEH may elect to file a complaint to be heard before the Fair Employment and Housing Commission (FEHC) or in civil court on behalf of the aggrieved complainant.

If HUD's FHEO receives and retains a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the FHEO must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds "reasonable cause," HUD must issue a "Charge of Discrimination." If the investigator determines that there is no "reasonable cause," the case is dismissed. If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process. The advantages of seeking redress through the administrative complaint process are that the DFEH/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Unlike an employment discrimination case, it is not necessary for an aggrieved party to exhaust all administrative remedies before filing a housing discrimination lawsuit in court. Persons wishing to file a lawsuit directly in court may bypass the administrative process with the Department as they do not need a "right-to-sue" letter/recommendation from the DFEH. Aggrieved persons retain the right to bring their own civil action within the statute of limitations (generally two years) under either the federal FHA or the FEHA. The respondent in an administrative action also may elect to have the administrative proceeding terminated and the case instead adjudicated in federal court. The Department of Justice will prosecute the case on behalf of the aggrieved party. Additionally, the DOJ may bring suit on behalf of individuals based on referrals from HUD in the case of a "pattern or practice" of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. An aggrieved party may intervene in any action filed by the DOJ.

Though the FHA and FEHA are not identical, they are congruent, and accordingly California courts have historically been guided by both state and federal law in deciding claims of housing discrimination. If an individual has evidence that his or her rights under the FHA or California FEHA have been violated in a final land use or zoning decision, the aggrieved person may file a complaint with the state DFEH or with HUD, or file a lawsuit directly in state or federal court within the statute of limitations period. (HUD refers matters involving the legality of state or local zoning or other land use law or ordinance to the Department of Justice for further enforcement.)

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers to protect the housing rights and interests of aggrieved individuals and families impacted by discrimination, local civil rights advocacy groups on behalf of protected classes, and the Department of Fair Employment and Housing or DOJ to protect the public interest. However, for the recent five-year period—January 1, 2015 through December 31, 2019—no noteworthy federal or state lawsuits were found regarding fair housing claims originating in Chino Hills.

Complaints Filed with HUD

Region IX of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout California (as well as Arizona, American Samoa, Guam, Hawaii, and Nevada). The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

The San Francisco Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. The office responded to a request for data regarding complaints received affecting housing units in San Bernardino County for the five-year period August 1, 2014 through August 31, 2019.

For the 5-year period, HUD received and processed one complaint regarding alleged discriminatory housing actions in the City of Chino Hills. Filed February 9, 2017, the complainant alleged discrimination based on disability and identified the following discriminatory acts or practices, recorded as the discriminatory issues: Discriminatory refusal to rent; discriminatory terms, conditions, privileges, or services and facilities; and failure to make a reasonable accommodation. However, after investigation, HUD dismissed the complaint on January 29, 2018, after making a “no cause” determination.

Complaints filed with the California Department of Fair Employment and Housing

The Department of Fair Employment and Housing’s statutory mandate is to protect the people of California from employment, housing, and public accommodations discrimination, and hate violence and human trafficking. To accomplish this mission, the Department receives, investigates, conciliates, mediates, and prosecutes complaints of alleged violations of the Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, Ralph Civil Rights Act, Trafficking Victims Protection Act, and statutes prohibiting discrimination in state-funded activities and programs.

A request was submitted to the DFEH for data reflecting the number of housing discrimination related complaints received by the Department regarding housing units in Chino Hills for the previous five-year period. From November 1, 2014 through November 31, 2019, the DFEH reported that it had received no formal complaints of housing discrimination originating within the jurisdiction of Chino Hills.

Complaints filed with Inland Fair Housing and Mediation Board

Inland Fair Housing & Mediation Board, headquartered in Ontario, uses the FHIP funding it receives to conduct education and outreach, complaint intake and conciliation, fair housing investigation and testing, and referral of housing discrimination complaints.

Inland did not provide any response or data regarding complaints it may have received and processed concerning housing units in Chino Hills for 2014-2019.

Past Fair Housing Goals and Related Activities

The 2013-2018 Fair Housing Action Plan for Chino Hills identified several private sector impediments to fair housing.

Financial/Affordability Impediments

- The Home Mortgage Disclosure Act (HMDA) data reveal that some borrowers are not prepared to purchase a home because a large percentage of loans are denied due to high debt to income ratios.
- Insurance premiums do not generally pose extraordinarily higher costs in Chino Hills. However, without adequate knowledge consumers could pay more than they need to for appropriate insurance coverage.

Recommendations provided in the 2013-2018 Fair Housing Action Plan:

- The City will provide a link to the Inland Fair Housing and Mediation Board website. IFHMB provides First Time Homebuyer classes. Families attending those classes will be informed of the importance of debt to income ratios when applying for a home loan.
- The City will recommend IFHMB add “homeowners’ insurance” and “CLUE Reports” to its homebuyer counseling services. The recommendation’s goal is to provide educational services to homebuyers so they understand the impact of CLUE Reports and can compare homeowner’s premium rates.

Discriminatory Impediments

- Although housing discrimination is infrequently reported, it is an underreported event. Some residents could experience housing discrimination and 1) not know how to detect it; 2) not know where to report it; and 3) uncertain about whether they want to report it.
- Complaints regarding discriminatory appraisal practices are not routinely collected by local, State or Federal agencies. It may occur but would-be homebuyers are in the best position to detect potentially discriminatory practices.
- Property management practices pertaining to occupancy limits; service and companion animals; and reasonable accommodations and modifications can pose impediments to fair housing choice.

- The private sector refusal to allow either a reasonable modification or reasonable accommodation is an impediment of concern to the City.
- Ads containing discriminatory words or phrases are infrequently published. However, ads with discriminatory words or phrases may be published in the future. Additionally, ads stating “no pets” may discourage disabled person from applying for the apartment housing advertised in print publications.
- Hate crimes occur infrequently. When they do occur, they can devastate families who believe they must move from the home and neighborhood of their choice.

Recommendations in the 2013-2018 Fair Housing Action Plan:

- The City will continue to offer to its residents fair housing services which includes the processing of housing discrimination complaints and landlord/tenant counseling services. Sometimes a landlord/tenant issue has as its basis a housing discrimination concern. The City will provide a link to the Inland Fair Housing and Mediation Board website. IFHMB’s website will provide visitors a means to ask fair housing questions.
- The City will require IFHMB to add “how to read an appraisal report” to its homebuyer counseling services. The aim of the recommendation is 1) to inform borrowers of their right to request the appraisal report and 2) to provide information on the contents of the report and how to detect possible discriminatory practices.
- Inland Fair Housing & Mediation Board will:
 - Compile a list of the names and email addresses of the resident apartment managers
 - Conduct a half-day training workshop on fair housing laws for resident apartment managers.
 - Conduct a follow-up half-day workshop on reasonable accommodations and modifications.
 - Conduct a workshop between fair housing counselors and resident managers to exchange insights on a variety of fair housing issues.
 - Periodically send emails to the resident managers regarding fair housing information.
 - Every quarter or semi-annually the Q&A prepared by Apartment Association of San Bernardino County should focus on fair housing questions and answers.
- Inland Fair Housing & Mediation Board will distribute information on reasonable accommodations and modification to all resident apartment managers.
 - The information should encourage the apartment communities to establish a written policy regarding reasonable accommodations and modifications.
 - In this regard, Inland should prepare a model written policy and distribute it to the resident managers.
 - The City will encourage IFHMB to publish in its quarterly newsletter articles on reasonable modifications and accommodations.
 - The City will provide a link to IFHMB’s newsletters.
- Semi-annually IFHMB will review ads published in newspapers, on apartment search websites, and on Craigslist. Ads with discriminatory words or phrases should be referred to IFHMB for follow-up action.

- IFHMB will encourage the Inland Valley Daily Bulletin and The Champion to publish a fair housing notice.
 - Some disabled persons are unaware of their fair housing rights and, as a consequence, may not consider as available to them apartments with ads that state, “no pets.” IFHMB will encourage the Los Angeles Times, Inland Valley Daily Bulletin and The Champion to publish a concise “no pets” notice that indicates rental housing owners must provide disabled persons reasonable accommodations so they may keep their “service” and/or “companion animals.”
- The Community Services Department should prepare a Hate Crime Victims Resource Directory. When that Directory is deemed to be complete the Department will transmit it to the Police/Sheriff’s Department to use as a referral resource

Progress since the 2013-2018 Fair Housing Action Plan:

Since the 2013-2018 FHAP, Chino Hills has partnered with the Inland Fair Housing and Mediation Board (IFHMB) each year for an annual fair housing workshop at the Chino Hills Community Center. The IFHMB has also attended city events, such as the summer Concerts in the Park, to share information with citizens on fair housing. The IFHMB also distributes information on discrimination against protected classes through cable releases. During the 2018-2019 fiscal year, the IFHMB instructed over 100 Chino Hills residents on their rights and responsibilities as renters, and other topics such as evictions, repairs, security deposits, neighbor disputes and rent increases.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 21, along with implementation timeframes and responsible parties.

Impediment 1: Affordable Housing Needs Disproportionately Affect Protected Classes

Housing prices in Chino Hills are higher on average than in the remainder of San Bernardino County and in the wider Riverside-San Bernardino-Ontario, CA region. These costs are often unattainable for lower-wage workers, seniors living on fixed incomes and other groups. For example, minimum wage workers in Chino Hills would need to work 79 hours per week to afford a two-bedroom apartment at the HUD Fair Market Rent of \$1,232. Black and Hispanic households are more likely than White households to have a housing need in Chino Hills. Non-family households, such as single-person and unrelated, multi-person households experience disproportionately high housing costs. Survey participants also noted a need for affordable and accessible senior housing.

The City of Chino Hills does not contain any public housing developments, project-based Section 8 or low-income housing tax credit sites. The city also has a very low rate of housing choice voucher use. There are 25 affordable units at the Heights Apartments on Slate Drive, but this is one of a very limited set of options. Despite the limited supply of affordable housing, survey participants expressed strong objection to any additional housing, particularly affordable housing. Because of these constraints, the City has met its RHNA requirements through HCD's default density process. The City has successfully zoned sufficient properties for a density of over 30 units per acre to satisfy its all past and current RHNA obligations. The City will continue to look for rezoning opportunities and available state and federal funding programs to meet the expected obligations of the 6th cycle RHNA.

Impediment 2: Community Policies and Public Opinion Limit Affordable Housing

Chino Hills has a limited supply of affordable housing due to factors including local zoning policies, community opposition, and steep topography which constrains land availability. The City's Development Code was reviewed for provisions that may have the effect of limiting affordable housing development and. The City is currently developing an ADU ordinance consistent with the recent changes in state law and has held 2 public workshops with the Planning Commission. The City expects to complete the update the ADU ordinance within the next few months. The City also been engaged in the 6th cycle RHNA process that will require the City to accommodate an expected substantial number of new housing units. City staff has held public discussion with the Planning Commission on possible strategies to address these upcoming obligations. Upon receipt of its final 6th cycle allocation, the City will hold public workshops to assess and develop strategies to meet its RHNA requirements. Options that will be considered will include rezoning, upzoning and other code changes to encourage development of affordable housing.

While fewer than a quarter of survey respondents believed housing discrimination to be an issue in Chino Hills, 45% acknowledged that residents are being displaced due to rising housing costs and 38% cited community opposition to affordable housing as a barrier to fair housing for city residents. Public sentiments shared in community meetings further underscore a NIMBY (“not in my backyard”) attitude toward affordable housing in the area. Neighbors opposed to an affordable housing development in their community have opportunities through the zoning and design review process to organize and discourage officials from approving the plans. Even the threat of such action can keep away otherwise willing developers. Community education around the value of affordable housing for the City’s line cooks, waiters, baristas, professional caregivers, artists, shop clerks, students, and other essential but low-wage workers could be helpful in eroding local opposition.

Demographic differences between Chino Hills and its less affluent neighbors in the Inland Empire suggest that the City’s resistance to affordable housing, while perhaps not intentionally, presents a de facto barrier for Black and Hispanic residents of the region who may disproportionately face affordability challenges.

Impediment 3: Continued Need for Neighborhood Infrastructure and Public Improvements

The City of Chino Hills has made neighborhood improvement efforts a priority in recent years, including public infrastructure improvements, public facilities, neighborhood cleanups, and code enforcement efforts, with a focus on the city’s low- and moderate-income neighborhoods. In particular, the City has targeted improvements to the Los Serranos neighborhood, dedicating a portion of its CDBG funding and funds from the City’s general fund. However, with limited CDBG and other public funding available, there is continued need for infrastructure investment in the city’s low- and moderate-income neighborhoods.

Residents and stakeholders interviewed as part of this planning process indicated a moderate to high level of need for several public improvements, including street and sidewalk improvements or expansion; community parks, gyms, and recreational fields; public safety offices; and community centers. In particular, survey respondents and meeting attendees noted a need for continued investment in public improvements in the Los Serranos neighborhood, which has received limited public investment in basic improvements and amenities such as lighting, sidewalks, and community parks until recently. The clustering of the city’s Hispanic population in the Los Serranos neighborhood, as detailed in Chapter 4, creates concerns surrounding access to these public amenities and improvements for this population. To support equality of access to neighborhood improvements across racial and ethnic groups in Chino Hills, the City should continue to invest in public improvements in Los Serranos and other areas of the city lacking access to these improvements. Further, as the City continues code enforcement efforts in low- to moderate-income areas of Chino Hills, it should ensure that residents in these areas have access to and are aware of housing rehab programs and other available resources to support them in making improvements to housing and addressing code enforcement violations.

Impediment 4: Continued Need for Fair Housing Education

A continued need for ongoing fair housing outreach, education, and enforcement is evident from public input and results of the fair housing survey. While some meeting and interview participants were aware of local fair housing resources, most notably the Inland Fair Housing and Mediation Board (IFHMB), others

could not name any specific resources or knew only vaguely that some may be available in the community. The large majority of survey takers – about 85% – report knowing or somewhat knowing their fair housing rights, indicating that education efforts by Inland Fair Housing, the City, and other partners have reached members of the public. While only 16% of respondents are unaware of their fair housing rights, a larger share – 43% – report not knowing where to file a complaint. Continued fair housing outreach and education efforts will maintain and expand residents' understanding of fair housing rights while also increasing awareness of resources available should they have a fair housing issue.

Although housing discrimination complaint data indicated only one complaint filed in Chino Hills over the last five years, several survey participants (13 people) reported facing housing discrimination since living in the city. Most commonly this was by landlord or property managers, suggesting that additional fair housing outreach and education to rental property managers/owners may be warranted, particularly to small/independent landlords who may not otherwise have access to training regarding fair housing law.

TABLE 21 – FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 1: Affordable Housing Needs Disproportionately Affect Protected Classes		
Rising housing costs threaten to displace working young adults and low-income senior residents	• Review the Qualified Allocation Plan issued annually by CTCAC under its Low Income Housing Tax Credit (LIHTC) program to identify local government policies or actions that may positively impact the competitiveness of developers' applications. Annually, beginning Q2, 2021) • For developers proposing LIHTC projects in the City, work with them to increase the competitiveness of their applications through letters of support, provision of data and information, gap financing, and other assistance. (Ongoing, beginning Q2 2020) • Continue to commit general funds to affordable housing as a supplement to federal funding. Funds can be used toward resident education on home maintenance, and repair/maintenance grants to households. (Ongoing, 2020) • Pursue funds through the HOME Consortium to assist with housing maintenance programs for residents (Q1, 2021) • Taking advantage of the recent changes in state law that allow one ADU and one junior ADU in residential zones regardless of lot size. (Q1, 2022)	City of Chino Hills
Resident efforts to protect community character may slow or prevent the development of new affordable housing	• Convene a committee or other group of local stakeholders to discuss strategies for increasing the supply of affordable housing in Chino Hills and preserving of existing affordable units. The stakeholder group should include representatives from diverse perspectives, possibly to include citizens, elected officials, city staff, housing advocates, affordable housing providers, and others. Based on the committee's work, present top policy recommendations to City Council for consideration and possible adoption. Possible policy options to be considered include but should not be limited to: a. Exploring housing preservation models such as Community Land or Community Housing Trusts • Continue to collect fees through the City Affordable Housing In Lieu Fee program. to Developing a sustainable source of funding to assist in the development of new affordable housing or preservation/rehabilitation of existing affordable units. (Q1, 2021)	City of Chino Hills

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 2: Community Policies and Public Opinion Limit Affordable Housing		
Zoning policies and topography issues increase housing development costs, making affordable housing development less likely	• Develop and adopt an ADU ordinance consistent with the recent changes in state law (Q4, 2020) • Hold public workshops to assess and develop strategies to meet the City's RHNA requirements (Q2, 2021) a. Consider options that include rezoning, upzoning, and other code changes to encourage development of affordable housing	City of Chino Hills
"Not In My Backyard" (NIMBY) attitudes preclude affordable housing development in some areas	• Develop and deliver community education around the concept of affordable housing and its cultural and economic value to the community. a. Develop an adaptable slide deck and presentation on the subject of the value of affordable housing, including qualitative and quantitative arguments. (Q1, 2021) b. Establish a small "speakers bureau" of designated city staff or other community partners to deliver the presentation to local groups. (Q2, 2021) • Market the presentation and available speakers to community groups such as neighborhood/homeowners' associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning Q2, 2021)	City of Chino Hills

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 3: Continued Need for Neighborhood Infrastructure and Public Improvements		
Continued need for neighborhood reinvestment and cleanup in Los Serranos and low- and moderate-income census tracts	• Continue to fund projects that develop, expand, or improve sidewalks, parks, trails, and other public facilities in low- and moderate-income census tracts. (Ongoing, beginning 2020) • Continue code enforcement efforts. Combine these efforts with access to housing rehab programs to support low-income residents in making required improvements to housing. • Increase marketing of available housing rehab resources to residents to increase awareness of these resources as part of code enforcement in low- and moderate-income areas (Ongoing, beginning 2020)	City of Chino Hills
Impediment 4: Continued Need for Fair Housing Education		
Stakeholder input and survey responses indicate that more fair housing education is needed for the general public and landlords/rental property managers	• In-house or through a contracted provider such as the Inland Fair Housing and Mediation Board, design and coordinate delivery of a fair housing education program in English and Spanish that reaches members of the public who are most vulnerable to housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities. Focus on incorporating fair housing education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups, including organizations that serve Spanish-speaking residents. (Ongoing, beginning PY 2020) • Consider offering a seminar or other form of outreach focused on “Landlord Rights and Responsibilities” targeted to private landlords with units in Chino Hills (and/or San Bernardino County) to review fair housing laws and best practices regarding tenant selection, accommodations for people with disabilities, lease terms, and other key topics. (Beginning PY 2021)	City of Chino Hills