



# **DRAFT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

**2020-2024**

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## A. Background

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, religion, age, sex, disability, marital status, familial status, or any other arbitrary factor. The Analysis of Impediments to Fair Housing Choice (AI) provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual or household's access to housing.

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

### *Fair Housing Laws*

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

The State of California has enacted several statutes that mirror and, in certain cases, extend fair housing protections in federal law. The Unruh Civil Rights Act of 1959<sup>2</sup> and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges or services of all business establishments regardless of protected status. The courts have interpreted the Unruh Civil Rights Act of 1959 to prohibit any arbitrary discrimination based in any class distinction, regardless of whether that basis is enumerated in the Unruh Civil Rights Act of 1959.

The Fair Employment and Housing Act of 1963<sup>3</sup> is the primary state law, which prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, age, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992 brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a "mental and physical disability" and "familial status." "The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

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

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

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

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

### *Defining Fair Housing and Impediments*

Considering fair housing legislation passed at the federal and state levels as well as consultation with the U.S. Department of Housing and Urban Development (HUD) and professionals providing fair housing services, the following definition of fair housing is used for this report:

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

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

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

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

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

- Certify its commitment to actively further fair housing choice;
- Maintain fair housing records; and

- Conduct an analysis of impediments to fair housing choice.

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

## **B. Methodology and Citizen Participation**

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

### *Methodology*

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a recipient of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds, Fontana is required to update the AI every five (5) years and to report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD each program year. The last AI was adopted in 2015. This AI is an update of the 2015 AI.

The purpose of this AI is to identify impediments to fair and equal housing opportunities in Fontana. This AI provides an overview of the laws, regulations, conditions or other possible obstacles that may affect access to housing and other services in Fontana. The scope, analysis and format used in this AI report adheres to recommendations of the *Fair Housing Planning Guide* published by HUD.

The AI contains six (6) chapters:

1. *Executive Summary*. This chapter provides background on fair housing, methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
2. *Community Characteristics*. This chapter provides a brief history of the City, a demographic profile, income profile, employment profile, housing profile, special needs housing profile and key maps to provide the baseline information necessary to form a complete understanding of the City. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined.
3. *Analysis of Private Sector Impediments*. This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.

4. *Analysis of Public Policy Impediments.* This chapter identifies and analyzes a range of public activities that may impede fair housing choice, including governmental land use, development regulations, and community development activities. Potential impediments to fair housing choice are discussed.
5. *Analysis of Current Fair Housing Activity.* This chapter includes the current fair housing education, enforcement and legal status of any pending cases currently underway in the City.
6. *Conclusions and Recommendations.* This chapter provides a summary of major issues and recommendations to further fair housing. This chapter also reports on progress made in implementing the prior AI. This chapter outlines the City's Fair Housing Plan for 2015-2019 including specific actions to be taken to address identified impediments within specific timeframes.

#### *Citizen Participation*

The City values citizen input on how well city government serves its residents. The public participation effort for the 2020 Analysis of Impediments to Fair Housing Choice (AI) adheres to the City's adopted Citizen Participation Plan. To solicit public participation in the AI, the City held two Community Meetings (September 18, 2019 and September 21, 2019). The purpose of these meetings was to provide background on the scope of the study and solicit input on the most pressing issues affecting housing opportunities in Fontana. The City also distributed Resident Surveys at various locations. Following the Community Meetings, a draft copy of the AI was prepared. The Draft AI was then finalized and made available for a 30-day public review. The survey was also available electronically on the City website.

### C. Status of Prior Impediments and Recommendations

HUD requires the City to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior AIs. The following impediments were cited in previous reports:

1. **2007 Impediment No. 3** involved lending discrimination based on race. Home Mortgage Disclosure Act (HMDA) data from 2008 showed that Hispanic and African-American individuals or families experienced lower loan approval rates than other groups when purchasing or refinancing a home in the City.

Race/Ethnicity	Home Purchase Loan Approval Rate	Refinance Approval Rate
Asian	55%	39%
White	55%	37%
Hispanic	48%	33%
African American	40%	23%
<b>All Groups (Overall)</b>	<b>45%</b>	<b>28%</b>

Source: HMDA Database, 2009.

Race/Ethnicity	Home Purchase Loan Approval Rate	Refinance Approval Rate
Asian	85%	79%
White	90%	76%
Hispanic	86%	76%
African American	82%	70%
<b>All Groups (Overall)</b>	<b>88%</b>	<b>82%</b>

Source: HMDA Database, 2015.

Race/Ethnicity	Home Purchase Loan Approval Rate	Refinance Approval Rate
Asian	74%	44%
White	79%	50%
Hispanic	76%	38%
African American	65%	41%
Decline or N/A	96%	51%
<b>All Groups (Overall)</b>	<b>81%</b>	<b>43%</b>

Source: HMDA Database, 2017.

**2020 Status: Addressed but remains a priority.** African Americans continue to have the lowest approval rates for home purchase loans and Hispanics have the lowest approval rate for refinance loans.

**Recommendation:** Continue monitoring HMDA data and affirmatively market the availability of first-time homebuyer assistance programs that provide down payment assistance to low- and moderate-income homebuyers. Additionally, the City will encourage attendance at any homebuyer education training workshops convened in the City or adjacent areas by its fair housing service provider or other qualified entities. The City and its contracted fair housing service provider may provide written outreach to lending institutions regarding the City's commitment to eliminate racial discrimination in lending patterns; to encourage attendance of all staff at IFHMB workshops; and to provide flyers regarding FTHB education, including IFHMB's FAQ on the City's website.

- 2. 2007 Impediment No. 5** involves a trend whereby complaints received by the City's contracted fair housing service provider on the basis of disability continue to be the leading basis of all discrimination complaints. This demonstrates a lack of understanding and sensitivity of the fair housing rights of the disabled by the housing industry.

**2020 Status: Addressed but remains a priority.** According to data from the City's contracted fair housing service provider, discrimination against persons with disabilities continues to be the leading basis of discrimination. From July 1, 2017 to June 30, 2018, there were 35 allegations of discrimination on the basis of disability from Fontana residents, representing 64 percent of all complaints.

**Recommendation:** Continue working with the City's contracted fair housing service provider to provide recommendations of properties believed to be discriminatory in their practices as information is received; facilitate accessibility reviews of multi-family properties; and distribute design and construction information to all who inquire about building permits. Providing literature regarding the Fair Housing Act's seven design and construction requirements to property owners and managers may also help to address the relatively high proportion of complaints based on disability.

- 3. 2007 Impediment No. 6** identifies a general lack of awareness of fair housing laws. This finding is informed by the increasing number of fair housing complaint intakes performed by the City's contracted fair housing service provider and their interaction with housing providers and housing seekers during workshops which demonstrated a lack of understanding of both Federal and State fair housing laws.

**2020 Status: Addressed but remains a priority.** The City received data from its fair housing service provider showing current information about fair housing complaint intakes. The data indicates that the number of fair housing complaints in Fontana is somewhat higher than those of neighboring Cities in the housing

market area.

**Recommendation:** Continue working with Inland Fair Housing and Mediation Board (IFHMB) to provide opportunities for conducting Fair Housing workshops in the City and providing IFHMB outreach materials as a part the City's newsletter and utility bill mailings. Encourage collaboration with local realtors; providing recurring education to members of the Inland Valleys Association of Realtors; offering no-cost Fair Housing workshops; and developing a fair housing FAQ for the City's website.

The City has a fair housing link to the Services page of the City of Fontana's website, as well as on the Housing Authority page. Continue providing fair housing material at several community events including a City meeting with local community-based organizations, Citrus Head Start Resources Fair, a Housing Rights and Responsibilities workshop and Health Resources Fair at the Fontana Senior Center. Continue releasing cable bulletins via the City's Community Channel for recruiting testers, familial status, general housing discrimination and domestic violence at various times during the year.

#### **4. 2010 Impediment No. 7: Transit Access.**

Transit provides elderly people, low income people, youth, and others access to jobs, medical facilities, parks, housing, and public services. Omnitrans, the City's transit provider, has adopted service standards to ensure an equitable distribution of services. For instance, all areas having a minimum residential density of 3.5 dwelling units per acre or employment density of 10 jobs per acre, as measured over an area of 25 acres, should be provided with a transit service that places 90 percent of residences and jobs within one half mile of a bus stop. Closer analysis of Fontana's development patterns reveals two (2) underserved areas, as follows:

- **Falcon Ridge / Summit Avenue Job Center:** Omnitrans does not have a bus route connecting the public transit system to the Falcon Ridge and Summit shopping centers located on either side of Summit Avenue off of the 1-15 freeway in North Fontana. This is a major new employment center that includes shops, restaurants and stores such as Target, Kohls, Staples, and Stater Brothers. This shopping center serves emerging residential developments in North Fontana. Fontana and the City of Rialto are experiencing a significant amount of commercial and residential development in this area along the I-15 and 210 Freeways which should increase ridership potential.
- **Southwest Industrial / Jurupa Hills Job Centers:** Bus route 82 is the southwestern-most as well as the northernmost bus route in the City, running east-west in the south for miles along Jurupa Avenue, and north

along Sierra Avenue from Jurupa up to the 210 freeway. An extension of this line or another route along Slover Avenue just south of the 10 freeway would connect residents to two of the top 10 employers in Fontana that are not located within one-half mile of a bus stop. These include Sierra Pacific Aluminum, located 0.8 miles from the bus stop at Mulberry and Marley; and Estes West, located 0.7 miles from the bus stop at Jurupa and Cherry.

**2020 Status: In Progress.** Based on evaluation of ridership and ability to provide fixed route service, the bus routes in Fontana remain largely as they were in 2015. The City will continue to monitor Omnitrans Transit Plans and advocate when possible for additional service. In the last five years, the City has worked with Omnitrans to provide a bus route with new stops in the Northern areas of the City (Route 82: Rancho Cucamonga-Fontana-Sierra Lakes). The City of Fontana continues to work with Omnitrans on bus routes throughout Fontana. That process includes evaluating current and potentially future lines (based upon anticipated development). The current priorities include identifying locations for the installation of bus turnouts and bus shelters. Omnitrans services are generally in response to both demand (ridership) and by new housing development (in both Central and North Fontana).

**Recommendation:** Continue to advocate for expanded public transportation opportunities servicing the Falcon Ridge / Summit Avenue Job Center and the Southwest Industrial / Jurupa Hills Job Centers.

**5. 2010 Impediment No. 8: Reasonable Accommodation.**

Part of the American dream involves owning a home in a safe neighborhood near community amenities. Homeownership is believed to enhance one's sense of well-being, help accumulate wealth, and strengthen neighborhoods, because residents with a greater stake in their community will be more active in decisions affecting their community. Ensuring fair housing is an important way to improve the housing opportunities for residents in Fontana.

A significant portion of the housing in Fontana was built before the advent of modern accessibility standards, thus modifications to homes may be needed to allow access by a disabled person. The City allows property owners to install features to accommodate disabled persons upon payment of building and planning fees and a zone variance application fee. Although the variance, if approved, provides for reasonable accommodation, the high cost of the variance coupled with the time delay associated with application and approval can be a deterrent to making lower cost improvements necessary for accessibility purposes. Although a variance is a permissible way to make reasonable accommodations, situations could arise where a request could be denied under a variance finding but still be valid as a reasonable accommodation.

**2020 Status: In Progress.** An amendment to the Development Code has not been made to date. The City’s practice is to follow State law (SB 520) and staff is directed to waive any minor variance fees for the disabled.

**Recommendation:** Implement Housing Production Strategy 4.1 of the 2014-2021 Housing Element. To comply with Federal and State housing laws (SB 520), the City will analyze existing land use controls, building codes, and permit and processing procedures to determine constraints they impose on the development, maintenance, and improvement of housing for persons with disabilities. Based on its findings, the City will develop a policy for reasonable accommodation to provide relief from Code regulations and permitting procedures that have a discriminatory effect on housing for individuals with disabilities. The procedures shall include the process for requesting accommodation, a timeline for processing and appeals, criteria for determining whether a requested accommodation is reasonable, and ministerial approval for minor requests.

**6. 2010 Impediment No. 9: Multi-Family Civil Rights Compliance.**

As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City must examine Federal and contractual civil rights compliance requirements on all City-owned multi-family residential properties.

**2020 Status: Ongoing.** The City continues to examine and monitor all Housing Authority / City-owned multi-family residential properties to ensure compliance with Federal and contractual civil rights compliance requirements.

**Recommendation:** As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City should continue to examine Federal and contractual civil rights compliance requirements on all City-owned multi-family residential properties to ensure ongoing compliance.

**7. 2010 Impediment No. 10: North Fontana Affordable Multi-Family Development.**

As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City must examine opportunities for the creation of new, affordable multi-family housing (government assisted as well as private developments) to be distributed equitably throughout the City—and to be located particularly in North Fontana. HUD’s letter of findings dated April 6, 2007 asserts that North Fontana (the area of the City north of the 210 Freeway) is populated predominately by non-Hispanic Whites, causing “de facto segregation” in the area. HUD further indicated that new developments that are age restricted (i.e. Senior Housing) must be equitably matched with new units that are not age-restricted.



Although the City has taken action through zoning amendments, private developers have not approached the City about undertaking new affordable multi-family development in any of the shaded areas shown on the map excerpt above representing opportunities for the northern part of the City. This impediment will be retained as part of the 2020 AI so that the City may continue to monitor to ensure that affordable multi-family housing is distributed equitably throughout the community.

With respect to HUD’s assertion in its monitoring review letter from 2007 concerning segregation within the community, an analysis of the racial/ethnic attributes of the residents of North Fontana was conducted and it has been determined that as a result of changes to market conditions since HUD’s 2007 evaluation, the area of Fontana north of the 210 freeway is no longer a majority White area. Refer to the race / ethnicity maps in Chapter 2.

**Recommendation:** As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City will examine opportunities for the creation of new, less expensive multi-family housing (government assisted as well as private developments) to be distributed equitably throughout the City—particularly in the undeveloped areas zoned for multi-family development in North Fontana.

#### **8. 2015 Impediment No. 1: Transitional and Supportive Housing**

State law requires cities to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of transitional and permanent supportive housing. The courts have also passed subsequent rulings.<sup>4</sup> To that end, State Law (SB2) requires jurisdictions to designate a zone and permitting process to facilitate the siting of such uses. If a conditional use permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities.

The City of Fontana Zoning Code does not currently provide zoning and development standards that facilitate the siting and development of transitional and supportive housing.

**2020 Status: Ongoing.** The City continues to evaluate ways to comply with SB-2 and provide the required zoning and development standards. On October 28, 2014, the City enacted Ordinance 1708, which established an Emergency Shelter Overlay District in Light Industrial land use designations.

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

**Recommendation:** To comply with SB-2, the City should analyze and revise the existing Zoning and Development Code to allow for emergency shelters, transitional housing and supportive housing to homeless individuals and families for annual and seasonally estimated need. The City should comply with the requirements of the State in the following manner:

- Ensure the provisions of the Housing Accountability Act are enforced and remove the potential for denial of emergency shelter/transitional housing facility via discretionary approvals if such housing is otherwise consistent with adopted regulatory standards.
- Evaluate development standards and regulatory provisions to ensure that standards encourage, rather than discourage, development.
- Amend the Fontana Municipal Code to permit transitional, supportive and single-room occupancy housing as a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.

**D. New Impediment to Fair Housing Choice and Recommendation**

This 2020 AI did not reveal any additional impediments.

**E. Summary**

In consideration of information gathered in the preparation of this 2020 AI and the evaluation of prior-identified impediments, seven (7) impediments are included in the Fair Housing Plan Recommendations shown in Table VI-1 at the conclusion of this report. The City's Department of Housing and Business Development will work with the Fontana Planning Department, OmniTrans, and the City's contracted fair housing service provider to address these impediments during the period of the 2020 AI.

## A. Historical Profile

Founded in 1913 by A.B. Miller, Fontana was originally an agricultural town of citrus orchards, vineyards and chicken ranches astride U.S. Route 66 (now known as Foothill Boulevard) and crisscrossed by numerous rail lines. Fontana was radically transformed during World War II. Henry J. Kaiser's steel mill in Fontana was the only steel mill west of the Mississippi River. The routing of the San Bernardino Freeway through a section of the town was followed by explosive growth, with the area becoming a prominent industrial suburb of San Bernardino.

The City was incorporated June 25, 1952 with a population of 13,695 at the time. Fontana became Southern California's leading producer of steel and related products. The steel industry has dominated the City's economy throughout its history. In the late 1970's, Kaiser Steel began to cut down on production and manpower and the steel mill closed in 1984. The plate steel and rolling mill plant was later acquired by California Steel Company, which continues to produce steel products. In addition to steel production, other industries such as railroad and trucking operations, several medium to heavy industrial facilities, and several warehousing/distribution centers are in Fontana because of its convenient geographical location and excellent transportation network.

In the 1950s and '60s Fontana was home to a famous drag racing strip that was a significant venue in the National Hot Rod Association (NHRA) circuit. Known officially as Mickey Thompson's Fontana International Dragway, it was also referred to as Fontana Drag City or the Fontana Drag Strip. The original Fontana strip is long since defunct, but the owners of NASCAR's new Auto Club Speedway opened a new NHRA-sanctioned drag strip in Fontana in mid-2006 to resurrect Fontana's drag-racing heritage.

As of the 2000 census, the city had a total population of 128,929. In 2011, the population reached up to 192,779, which is a 49.5 percent increase (2007-2011 American Community Survey). This rapid expansion had much to do with the numerous large, new residential developments in the undeveloped northern part of the city, as well as with the city's aggressive (and highly successful) campaign to annex several developed but unincorporated San Bernardino county island areas in 2006-2007.

The City of Fontana is located in Southern California at the intersection of Interstate 10, 15 and 210 and State Routes 66 and 30. Metrolink rail service to the greater Los Angeles area runs through the center of the City, which is only 10 minutes away from Ontario International Airport. Fontana is also close to the mountains, beaches, several lakes and desert areas. The City is approximate to 12 County of San Bernardino regional parks. The California Speedway is located just west of Fontana's border. Fontana is home to the Fontana Days Half Marathon and 5-k run, known as the fastest half marathon course in the world. In addition, there are 11 colleges and universities in the immediate area.

## B. Demographic Profile

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

### *Population Trends*

**Tables II-1, II-2, II-3 and II-4** below present demographic information and demographic trends both for the jurisdiction and the region. In terms of population growth from the period between 1990 and the present, the City of Fontana grew at nearly the double the rate of the region. The region saw an explosion in population of 63.2 percent within the period, with the number of area residents rising from nearly 2.6 million to over 4.2 million. The jurisdiction, however, saw growth of close to 95 percent within the same period, from 100,555 in 1990 to 196,069 currently. By the latest ACS estimates (2012-2017), the population has grown 106 percent from 1990 to the current year, with a population of 207,086.

### *Age and Sex Characteristics*

**Table II-1** below outlines the demographic information for the city of Fontana, while **Table II-II** outlines the demographic information for the region. **Tables II-III** and **II-IV** represent the demographic trends for the jurisdiction and the region, respectively. In keeping with the regions trend, the jurisdiction is made up mainly of individuals between the age of 18 and 64, with a little below 61 percent of the age group making up the city of Fontana, while just above 61 percent of that age group makes up the region. This demographic group grew consistent with both the jurisdiction and regions growth since 1990. The jurisdiction saw this age group increase by around 104 percent since 1990, whereas the region saw a growth rate of 67 percent.

The other two age groups, children under the age of 18 and individuals above the age of 65, experienced similar growth rates in both the jurisdiction and the region. In 1990, children under the age of 18 made up around 35 percent of Fontana’s residents, compared to 33 percent in the current year. For the region, children under the age of 18 made up around 30 percent of the population, compared to 28 percent in the current year. In terms of growth trends, the jurisdiction saw this group increase by around 82 percent since 1990, whereas the region saw an increase of around 58 percent. Individuals over the age of 65 represent a much smaller percentage of the population, making up around 6 percent of the jurisdiction and about 10

percent of the region. This group experienced similar growth to the children under 18 though, as the region saw them grow by 81 percent, and the region saw growth of about 58 percent.

In terms of sex, females have historically slightly outnumbered males within the jurisdiction, albeit by a slim margin. That trend has continued during the period under review, as women currently edge out men 50.29 percent to 49.71 percent, very slightly up from 50.07 percent to 49.93 percent in 1990. This is in keeping with the regional trend, which saw women grow from 50.00 percent of the population in 1990, to 50.27 percent in the current year.

**Table II-1  
Demographics of Fontana City (Jurisdiction)**

(Fontana, CA CDBG, HOME, ESG) Jurisdiction			
Race/Ethnicity		#	%
White, Non-Hispanic		29,821	15.21%
Black, Non-Hispanic		18,288	9.33%
Hispanic		131,978	67.31%
Asian or Pacific Islander, Non-Hispanic		12,307	6.28%
Native American, Non-Hispanic		454	0.23%
Two or More Races, Non-Hispanic		2,880	1.47%
Other, Non-Hispanic		341	0.17%
National Origin			
#1 country of origin	Mexico	40,671	22.27%
#2 country of origin	Philippines	4,451	2.44%
#3 country of origin	El Salvador	2,607	1.43%
#4 country of origin	Guatemala	1,251	0.69%
#5 country of origin	Ethiopia	785	0.43%
#6 country of origin	Vietnam	772	0.42%
#7 country of origin	Korea	696	0.38%
#8 country of origin	Peru	632	0.35%
#9 country of origin	Nicaragua	601	0.33%
#10 country of origin	Honduras	593	0.32%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	45,168	24.74%
#2 LEP Language	Tagalog	1,149	0.63%
#3 LEP Language	Chinese	891	0.49%
#4 LEP Language	Vietnamese	514	0.28%
#5 LEP Language	Arabic	467	0.26%
#6 LEP Language	Korean	450	0.25%
#7 LEP Language	Cambodian	307	0.17%
#8 LEP Language	African	180	0.10%
#9 LEP Language	Other Pacific Island Language	174	0.10%
#10 LEP Language	Other Indic Language	162	0.09%
Disability Type			
Hearing difficulty		3,776	2.07%
Vision difficulty		3,192	1.75%
Cognitive difficulty		7,467	4.10%
Ambulatory difficulty		8,840	4.85%
Self-care difficulty		3,907	2.14%
Independent living difficulty		6,360	3.49%
Sex			
Male		97,458	49.71%
Female		98,611	50.29%
Age			
Under 18		64,803	33.05%
18-64		120,366	61.39%
65+		10,899	5.56%
Family Type			
Families with children		25,209	59.65%

Data Sources: Decennial Census; ACS

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

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

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

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

Note 3: Data Sources: Decennial Census; ACS

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

**Table II-III  
Demographic Trends of Fontana City (Jurisdiction)**

		<b>(Fontana, CA CDBG, HOME, ESG) Jurisdiction</b>							
		<b>1990 Trend</b>		<b>2000 Trend</b>		<b>2010 Trend</b>		<b>Current</b>	
<b>Race/Ethnicity</b>		<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hispanic		51,796	51.39%	35,574	24.18%	29,821	15.21%	29,821	15.21%
Black, Non-Hispanic		7,876	7.81%	17,088	11.62%	19,632	10.01%	18,288	9.33%
Hispanic		36,394	36.11%	85,806	58.32%	131,978	67.31%	131,978	67.31%
Asian or Pacific Islander, Non-Hispanic		3,558	3.53%	6,755	4.59%	13,421	6.85%	12,307	6.28%
Native American, Non-Hispanic		675	0.67%	1,058	0.72%	801	0.41%	454	0.23%
<b>National Origin</b>									
Foreign-born		15,612	15.53%	39,886	27.10%	58,555	29.86%	59,988	30.60%
<b>LEP</b>									
Limited English Proficiency		11,510	11.45%	31,942	21.70%	52,609	26.83%	50,241	25.62%
<b>Sex</b>									
Male		50,211	49.93%	73,136	49.68%	97,458	49.71%	97,458	49.71%
Female		50,344	50.07%	74,068	50.32%	98,611	50.29%	98,611	50.29%
<b>Age</b>									
Under 18		35,511	35.32%	56,850	38.62%	64,803	33.05%	64,803	33.05%
18-64		59,032	58.71%	83,189	56.51%	120,366	61.39%	120,366	61.39%
65+		6,012	5.98%	7,166	4.87%	10,899	5.56%	10,899	5.56%
<b>Family Type</b>									
Families with children		15,701	63.75%	13,420	65.61%	25,209	59.65%	25,209	59.65%

Data Sources: Decennial Census; ACS

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

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

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

Note 2: Data Sources: Decennial Census; ACS

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

### *Race and Ethnicity*

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

Several generalizations can be made, based upon evaluation of the demographics and demographic trends presented in the tables above. First, the jurisdiction is more Hispanic than the region at large. Fontana's population is around 67 percent Hispanic, compared to 47 percent in the region. Second, the jurisdiction is significantly less White than the region (15 percent versus 37 percent). Third, the jurisdiction is slightly more Black than the region (9 percent versus 7 percent).

In terms of growth, the White population within the jurisdiction has followed the negative growth trend of the region (though much more substantially), both in absolute numbers and in terms of percentages, with the exception of one small uptick in the region's White population between 2000 and 2010, during which time the group's overall percentage continued to decline. Whereas

the White population declined in the region by about 4 percent in absolute numbers between 1990 and the present, the jurisdiction saw a decrease of around 42 percent. Non-White populations, meanwhile, have grown astronomically since 1990, including a greater than 260 percent population increase among Hispanics within the City of Fontana, compared to a greater than 190 percent increase in this group throughout the region.

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

### *Foreign Born Population and Limited English Proficiency*

In terms of national origin, the largest foreign-born population within the jurisdiction and the region is from Mexico, although at 22.27 percent of Fontana's residents, the proportion of this population is almost double the 13.95 percent of Mexican natives who live in the region. Whereas four of the region's ten largest groups of foreign-born nationals are from Latin America, six of the ten most populous groups of foreign nationals in the jurisdiction hail from Latin American. The remaining four most populous non-native groups hail from the Philippines (second-highest), Ethiopia (fifth-highest), Vietnam (sixth-highest), and Korea (seventh-highest), though these groups combined total only 3.67 percent of the City's population.

These foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Fontana residents with Limited English Proficiency (LEP) are among the fastest growing population subgroup, having increased their numbers a staggering 336 percent from 11,510 in 1990 to 50,241 currently. As a percent of the population, their numbers have increased from 11.45 percent to 25.62 percent. This is substantially larger than the regional percentage of 15.17 percent.

### *Racial Integration*

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

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

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

### *Dissimilarity Index*

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

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

However, an examination of overall trends reveals a different picture. In every category, the City is trending in the direction of more, not less, segregation at a rate that is significantly higher than that of the region overall. With respect to Non-Whites, the level of segregation from Whites, as measured by the Dissimilarity Index, has increased fully 68 percent within the City since 1990. By contrast, the level of Non-White/White segregation within the region has only increased by a factor of 25 percent during the same period. This trend is even more pronounced for Hispanics in the jurisdiction, as they have experienced greater segregation by over 110 percent, compared to 24 percent in the region. Asians and Pacific Islanders have experienced the smallest increase, with 10 percent growth in the jurisdiction and around 30 percent within the region. Blacks within the city have actually experienced a decrease in segregation at a rate of 16 percent, compared to a 9 percent increase in the region.

The relative degree of segregation within the City as respects these particular communities is shown in **Map II-I** below, wherein concentrations of colored dots represent various races/ethnic groups, with orange dots representing Whites. Each dot represents 50 people. To compare these trends over time, **Map II-II** shows the same data, but for the year 2010.

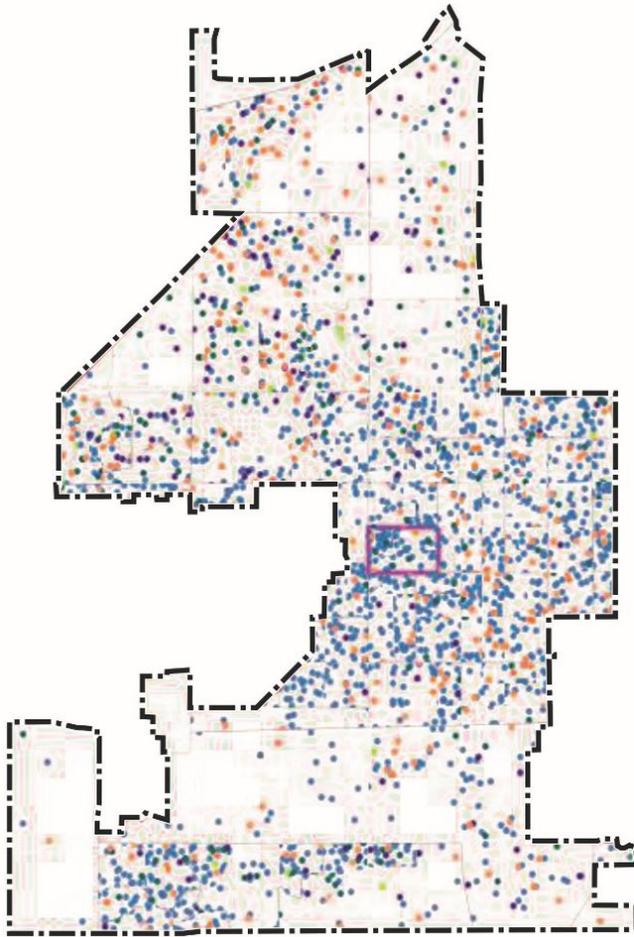
**Table II-V  
Racial/Ethnic Dissimilarity Trends**

	<b>(Fontana, CA CDBG, HOME, ESG) Jurisdiction</b>				<b>(Riverside-San Bernardino-Ontario, CA) Region</b>			
<b>Racial/Ethnic Dissimilarity Index</b>	<b>1990 Trend</b>	<b>2000 Trend</b>	<b>2010 Trend</b>	<b>Current</b>	<b>1990 Trend</b>	<b>2000 Trend</b>	<b>2010 Trend</b>	<b>Current</b>
Non-White/White	14.19	19.04	21.23	23.85	32.92	38.90	38.95	41.29
Black/White	25.34	25.36	18.44	21.41	43.74	45.48	43.96	47.66
Hispanic/White	13.80	21.17	27.05	29.22	35.57	42.40	42.36	43.96
Asian or Pacific Islander/White	26.33	29.81	24.52	28.98	33.17	37.31	38.31	43.07

Note 1: Data Sources: Decennial Census

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

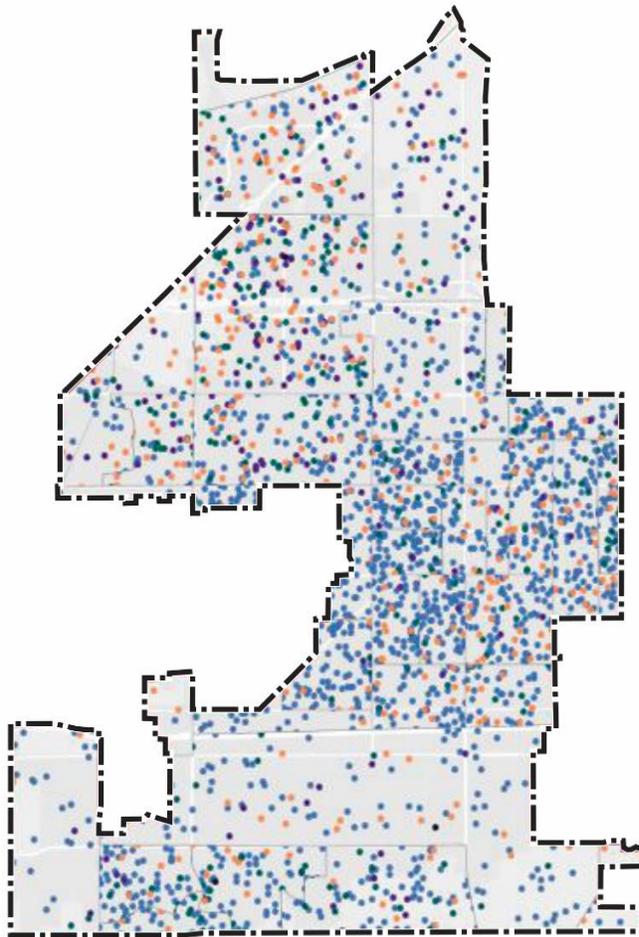
### Map II-I Race/Ethnicity



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b>			<b>Jurisdiction</b>		
<b>Name:</b> Map 1 - Race/Ethnicity			[Symbol]		
<b>Description:</b> Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs			<b>Region</b> [Symbol]		
<b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG)			<b>Demographics 2010</b> 1 Dot = 75		
<b>Region:</b> Riverside-San Bernardino-Ontario, CA			[Symbol] White, Non-Hispanic		
<b>Data Version:</b> AFFHT0004			[Symbol] Black, Non-Hispanic		
			[Symbol] Native American, Non-Hispanic		
			[Symbol] Asian/Pacific Islander, Non-Hispanic		
			[Symbol] Hispanic		
			[Symbol] Hispanic		
			[Symbol] Other, Non-Hispanic		
			[Symbol] Multi-racial, Non-Hispanic		
			<b>TRACT</b> [Symbol]		
			<b>R/ECAP</b> [Symbol]		

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

Map II-II  
Race/Ethnicity 2010



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b> <b>Name:</b> Map 2 - Race/Ethnicity Trends <b>Variation:</b> Race/Ethnicity Trends, 2010 <b>Description:</b> Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs <b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG) <b>Region:</b> Riverside-San Bernardino-Ontario, CA <b>Data Version:</b> AFFHT0004			<b>Jurisdiction</b>  <b>Region</b>  <b>Demographics 2010</b> 1 Dot = 75 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic  <b>TRACT</b>  <b>R/ECAP</b> 		

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

### C. Income Profile

In order to understand the unique economic situation of Fontana, it is useful to look at the Racially or Ethnically Concentrated Areas of Poverty (R/ECAP areas). These areas are defined as census tracts where more than half the population is non-White and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. **Table II-VI** and **Table II-VII** detail the demographic makeup of R/ECAP areas in the jurisdiction and the region, respectively.

In terms of the populations within R/ECAP areas, Fontana has less of its population in such areas when compared to the region (3 percent versus 5 percent). The demographic makeup of these areas, however, differs greatly between the jurisdiction and the region. Whereas close to 70 percent of the populations in R/ECAP areas are Hispanic within the region, nearly 86 percent of residents within these areas in Fontana are Hispanic. The inverse is true for White populations, however, as 14 percent of residents in R/ECAP areas in the region are White, whereas only 4 percent are White within Fontana.

Fontana also differs from the region when looking at the percentage of families within R/ECAP areas, as well as these residents national origin. While both the jurisdiction and the region have about 20 percent of residents within R/ECAP areas being members of family, over 76 percent of families within Fontana's R/ECAP areas have a child, compared to only 63 percent in the region. The national origin of R/ECAP residents also differs greatly between the two, mostly owing to the larger Hispanic population present in the jurisdiction. Whereas six of the eight national origins in the jurisdictions R/ECAP areas are from Latin American countries, only four of the top ten national origins in the regions R/ECAP areas are from such countries.

This composition of the R/ECAP area in Fontana presents unique challenges for the jurisdiction that may not be seen in the region. One issue that arises from such a demographic breakdown is the potential for this area, which is highly populated by and large by low-income, non-native English immigrants to face barriers related to language proficiency. In order to visual such an issue, consider the information detailed by **Map II-III**, **Map II-IV**, **Map II-V**, and **Map II-VII**. Within the R/ECAP area, most residents are primarily Spanish speakers. Additionally, the school proficiency within the area is arguably the lowest within the jurisdiction. When combined, these two issues combine to create a difficult situation for both first-generation children, as well as immigrants, who are attempting to assimilate into the jurisdiction.

**Table II-VI  
R/ECAP Demographics in Fontana City (jurisdiction)**

		(Fontana, CA CDBG, HOME, ESG) Jurisdiction	
R/ECAP Race/Ethnicity		#	%
Total Population in R/ECAPs		5,417	-
White, Non-Hispanic		228	4.21%
Black, Non-Hispanic		451	8.33%
Hispanic		4,634	85.55%
Asian or Pacific Islander, Non-Hispanic		55	1.02%
Native American, Non-Hispanic		8	0.15%
Other, Non-Hispanic		5	0.09%
R/ECAP Family Type			
Total Families in R/ECAPs		1,122	-
Families with children		859	76.56%
R/ECAP National Origin			
Total Population in R/ECAPs		5,417	-
#1 country of origin	Mexico	2,041	37.68%
#2 country of origin	Guatemala	89	1.64%
#3 country of origin	El Salvador	77	1.42%
#4 country of origin	Panama	65	1.20%
#5 country of origin	Philippines	41	0.76%
#6 country of origin	Honduras	32	0.59%
#7 country of origin	Ghana	9	0.17%
#8 country of origin	Venezuela	8	0.15%
#9 country of origin	Null	0	0.00%
#10 country of origin	Null	0	0.00%

**Table II-VII**  
**R/ECAP Demographics in Riverside-San Bernardino-Ontario, CA (Region)**

(Riverside-San Bernardino-Ontario, CA) Region			
Race/Ethnicity		#	%
White, Non-Hispanic		1,546,666	36.61%
Black, Non-Hispanic		301,523	7.14%
Hispanic		1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic		261,593	6.19%
Native American, Non-Hispanic		19,454	0.46%
Two or More Races, Non-Hispanic		91,476	2.17%
Other, Non-Hispanic		7,737	0.18%
National Origin			
#1 country of origin	Mexico	553,493	13.95%
#2 country of origin	Philippines	62,019	1.56%
#3 country of origin	El Salvador	30,455	0.77%
#4 country of origin	Guatemala	19,549	0.49%
#5 country of origin	Vietnam	19,525	0.49%
#6 country of origin	Korea	18,565	0.47%
#7 country of origin	India	15,522	0.39%
#8 country of origin	Canada	14,763	0.37%
#9 country of origin	China excl. Hong Kong & Ta	14,055	0.35%
#10 country of origin	Taiwan	9,245	0.23%

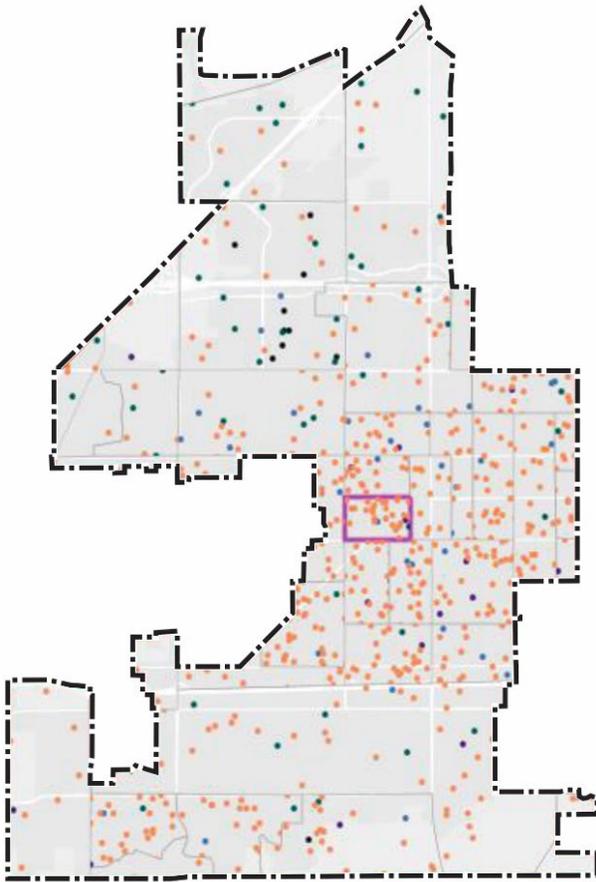
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details

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

### Map II-III National Origin



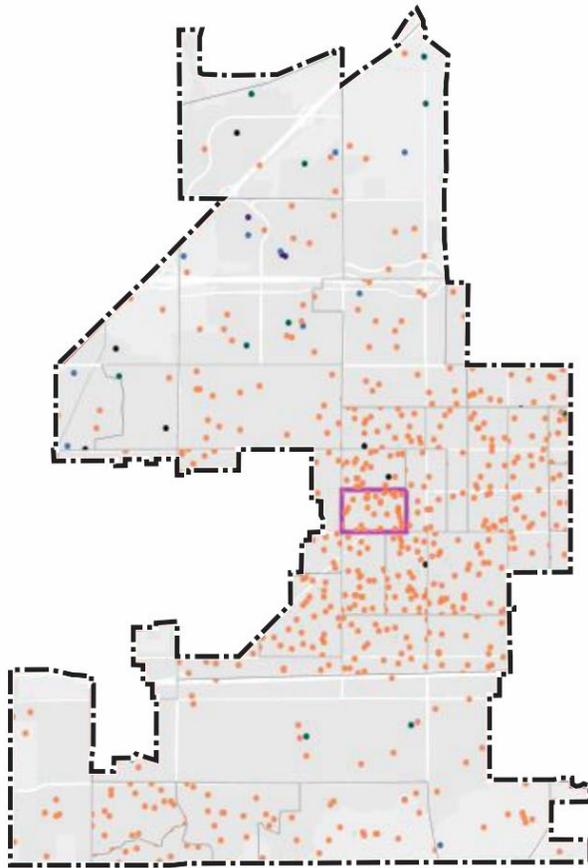
Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b> <b>Name:</b> Map 3 - National Origin <b>Description:</b> Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs <b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG) <b>Region:</b> Riverside-San Bernardino-Ontario, CA <b>Data Version:</b> AFFHT0004			<b>Jurisdiction</b> □ <b>Region</b> □ <b>National Origin [Jurisdiction] (Top 5 most populous)</b> 1 Dot = 75 People Mexico Philippines El Salvador Guatemala Ethiopia <b>TRACT</b> □ <b>R/ECAP</b> □		



CITY OF FONTANA



### Map II-IV Limited English Proficiency



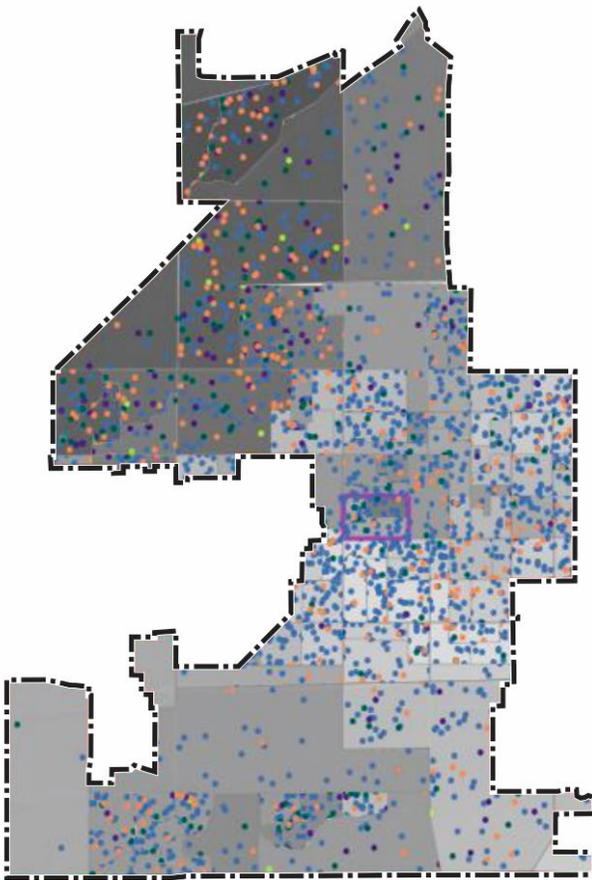
Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b> <b>Name:</b> Map 4 - LEP <b>Description:</b> LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs <b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG) <b>Region:</b> Riverside-San Bernardino-Ontario, CA <b>Data Version:</b> AFFHT0004			<b>Jurisdiction</b>  <b>Region</b>  <b>Limited English Proficiency [Jurisdiction] (Top 5 most populous)</b> 1 Dot = 75 People Spanish Tagalog Chinese Vietnamese Arabic  <b>TRACT</b>  <b>R/ECAP</b> 		



CITY OF FONTANA



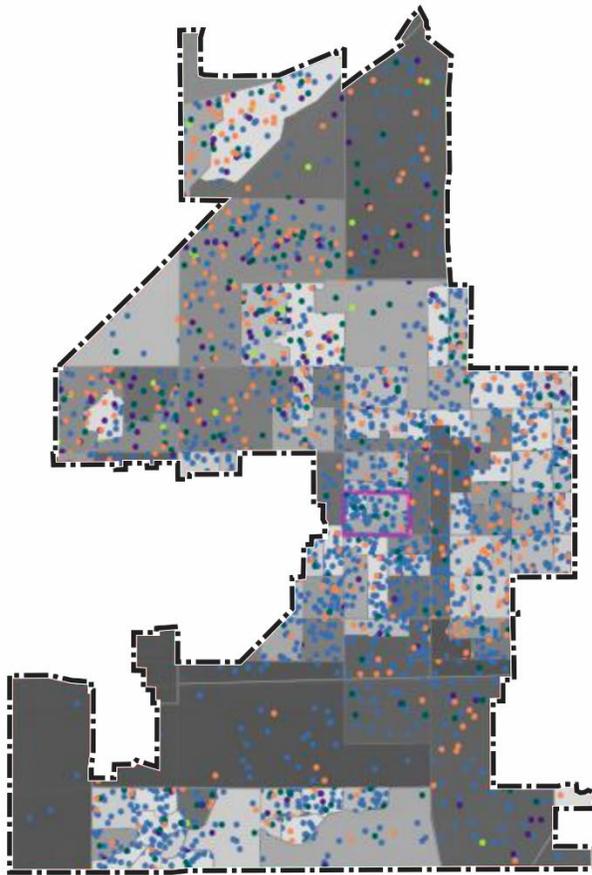
### Map II-V School Proficiency



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b>					
<b>Name:</b> Map 7 - Demographics and School Proficiency			<b>Jurisdiction</b>		
<b>Variation:</b> School Proficiency and Race/Ethnicity			<b>Region</b>		
<b>Description:</b> School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs			<b>Demographics 2010</b> 1 Dot = 75		
<b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG)			<ul style="list-style-type: none"> <li>White, Non-Hispanic</li> <li>Black, Non-Hispanic</li> <li>Native American, Non-Hispanic</li> <li>Asian/Pacific Islander, Non-Hispanic</li> <li>Hispanic</li> <li>Other, Non-Hispanic</li> <li>Multi-racial, Non-Hispanic</li> </ul>		
<b>Region:</b> Riverside-San Bernardino-Ontario, CA			<b>TRACT</b>		
<b>Data Version:</b> AFFHT0004			<b>R/ECAP</b>		
			<b>School Proficiency Index</b>		
			<ul style="list-style-type: none"> <li>0 - 10</li> <li>10.1 - 20</li> <li>20.1 - 30</li> <li>30.1 - 40</li> <li>40.1 - 50</li> <li>50.1 - 60</li> <li>60.1 - 70</li> <li>70.1 - 80</li> <li>80.1 - 90</li> <li>90.1 - 100</li> </ul>		
			<b>School Proficiency Index: Data not Available</b>		



### Map II-VI Demographics and Job Proximity



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b>					
<b>Name:</b> Map 8 - Demographics and Job Proximity			<b>Jurisdiction</b> Fontana (CDBG, HOME, ESG)		
<b>Variation:</b> Job Proximity and Race/Ethnicity			<b>Region</b> Riverside-San Bernardino-Ontario, CA		
<b>Description:</b> Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs			<b>Demographics 2010</b> 1 Dot = 75		
<b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG)			<ul style="list-style-type: none"> <li><span style="color: white;">●</span> White, Non-Hispanic</li> <li><span style="color: black;">●</span> Black, Non-Hispanic</li> <li><span style="color: gray;">●</span> Native American, Non-Hispanic</li> <li><span style="color: blue;">●</span> Hispanic</li> <li><span style="color: purple;">●</span> Asian/Pacific Islander, Non-Hispanic</li> <li><span style="color: red;">●</span> Hispanic</li> <li><span style="color: green;">●</span> Other, Non-Hispanic</li> <li><span style="color: yellow;">●</span> Multi-racial, Non-Hispanic</li> </ul>		
<b>Region:</b> Riverside-San Bernardino-Ontario, CA			<b>TRACT</b>		
<b>Data Version:</b> AFFHT0004			<b>R/ECAP</b>		
			<b>Jobs Proximity Index</b>		
			<ul style="list-style-type: none"> <li>0 - 10</li> <li>10.1 - 20</li> <li>20.1 - 30</li> <li>30.1 - 40</li> <li>40.1 - 50</li> <li>50.1 - 60</li> <li>60.1 - 70</li> <li>70.1 - 80</li> <li>80.1 - 90</li> <li>90.1 - 100</li> </ul>		
			<b>Jobs Proximity Index: Data not Available</b>		



CITY OF FONTANA



## D. Housing Profile

### *Public Housing*

Following the trends seen in the previous section, the city of Fontana faces unique housing issues when compared with the region. Starting with the public housing provided by the jurisdiction, **Table II-VIII** shows that public housing represents a very small percentage of the overall housing in the city. Less than 3 percent of all houses are publicly supported, with the most common being homes that are part of the HVC program, which comprise around half of all publicly supported houses.

However, when looking at **Table II-IX** the jurisdiction's public housing has a much different demographic make-up than that of the region. While the percentages are relatively similar across the board, there are three areas in which the city of Fontana greatly differs from the region. The number of White households in the HVC program is almost 15 percent less in the jurisdiction. Conversely, the number of Black households in the HVC program is almost 14 percent higher in the jurisdiction. Lastly, the number of Hispanic households in other multifamily public housing programs is almost 15 percent higher in the jurisdiction, though that only encompasses around 30 households.

Another issue illuminated by **Table II-IX** is the demographic breakdown of houses in relation to the area median income (AMI) of the jurisdiction and the region. AMI is a statistic used by HUD which tracks the median incomes for all cities across a county. When comparing how Fontana households compare to the regional averages, the issues in the previous section are once again present. While the region has around 45 percent of its Hispanic households within the 0-80 percent of the AMI, the jurisdiction has nearly 70 percent of its Hispanic households in that category. That disparity is even greater when looking at the lowest bracket (0-30 percent of the AMI), wherein the region has around 42 percent of Hispanic households in that bracket compared to the jurisdiction's 64 percent.

**Table II-X** details the difference in use of public housing between the R/ECAP and non-R/ECAP areas in the jurisdiction. The R/ECAP area accounts for around 10 percent of all public housing in the jurisdiction. As expected given the demographic make-up of the R/ECAP area, the main discrepancy lies in the percentage of Hispanic households using public housing. This mainly comes in the form of project-based section 8 housing, wherein the R/ECAP area has 64 percent of its houses in the program being Hispanic, compared to around 37 percent in the non-R/ECAP areas.

A more specific examination of the City's use of Project-Based Section 8 housing, as well as other multifamily assisted housing options can be seen in **Table II-XI**. As the table demonstrates, there are four developments that partake in Project-Based Section 8 housing: Citrus Grove Lf, Dino Papaver Senior Centre, Marygold Gardens Apartments, and Sunrise Senior Citizen Villa. While the availability of Project-Based Section 8 Housing is good, it is important to note the disparities

between these various developments. Two of the four are senior living facilities, within which Black and White residents are the primary individuals staying there. Conversely, the non-senior living assisted facility developments are primarily housed by Hispanic residents.

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

**Table II-VIII  
Publicly Supported Houses by Program Category**

	(Fontana, CA CDBG, HOME, ESG) Jurisdiction	
Housing Units	#	%
Total housing units	51,653	-
Public Housing	N/a	N/a
Project-based Section 8	359	0.70%
Other Multifamily	59	0.11%
HCV Program	767	1.48%
Note 1: Data Sources: Decennial Census; APSH		
Note 2: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).		

**Table II-IX  
Publicly Supported Houses by Race and Ethnicity**

(Fontana, CA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	112	32.46%	69	20.00%	141	40.87%	22	6.38%
Other Multifamily	18	31.03%	5	8.62%	30	51.72%	4	6.90%
HCV Program	73	9.35%	460	58.90%	241	30.86%	4	0.51%
Total Households	10,570	21.96%	5,504	11.43%	27,789	57.73%	3,218	6.69%
0-30% of AMI	805	17.47%	574	12.45%	2,934	63.66%	160	3.47%
0-50% of AMI	1,390	13.77%	899	8.91%	6,849	67.85%	405	4.01%
0-80% of AMI	2,660	14.54%	1,494	8.16%	12,779	69.83%	644	3.52%
(Riverside-San Bernardino-Ontario, CA) Region	Race/Ethnicity							
Housing Type	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	108	17.45%	203	32.79%	265	42.81%	42	6.79%
Project-Based Section 8	1,245	24.20%	1,055	20.51%	2,439	47.41%	366	7.12%
Other Multifamily	672	31.88%	252	11.95%	770	36.53%	404	19.17%
HCV Program	4,542	24.88%	8,293	45.43%	4,965	27.20%	386	2.11%
Total Households	615,660	47.84%	96,380	7.49%	469,370	36.47%	75,739	5.88%
0-30% of AMI	61,410	38.82%	18,475	11.68%	65,705	41.54%	7,940	5.02%
0-50% of AMI	101,180	32.18%	30,355	9.65%	137,770	43.82%	13,890	4.42%
0-80% of AMI	192,920	36.04%	45,500	8.50%	237,820	44.42%	23,430	4.38%

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

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

Note 3: Refer to the Data Documentation for details

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

**Table II-X  
R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program  
Category**

(Fontana, CA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
<b>Public Housing</b>								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
<b>Project-based Section 8</b>								
R/ECAP tracts	48	2.00%	32.00%	64.00%	2.00%	62.00%	4.00%	4.00%
Non R/ECAP tracts	299	37.63%	17.97%	36.95%	7.12%	13.16%	76.64%	9.54%
<b>Other Multifamily</b>								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	59	31.03%	8.62%	51.72%	6.90%	N/a	100.00%	1.69%
<b>HCV Program</b>								
R/ECAP tracts	61	2.90%	60.87%	36.23%	0.00%	52.86%	12.86%	20.00%
Non R/ECAP tracts	642	9.97%	58.71%	30.34%	0.56%	53.62%	20.16%	20.69%

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

Note 2: Data Sources: APSH

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

**Table II-XI  
Demographics of Publicly Supported Housing Developments, by Program Category**

<b>(Fontana, CA CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
Citrus Grove Lf	N/a	N/a	50	2%	32%	64%	2%	62%
Dino Papavero Senior Centre	N/a	N/a	150	47%	13%	31%	8%	N/a
Marygold Gardens Apartments	N/a	N/a	80	32%	9%	55%	3%	53%
Sonrise Sr Citizen Villa	N/a	N/a	79	23%	36%	29%	10%	N/a
<b>Other Multifamily Assisted Housing</b>								
<b>(Fontana, CA CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
John Piazza Apartments	N/a	N/a	59	31%	10%	51%	7%	N/a

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

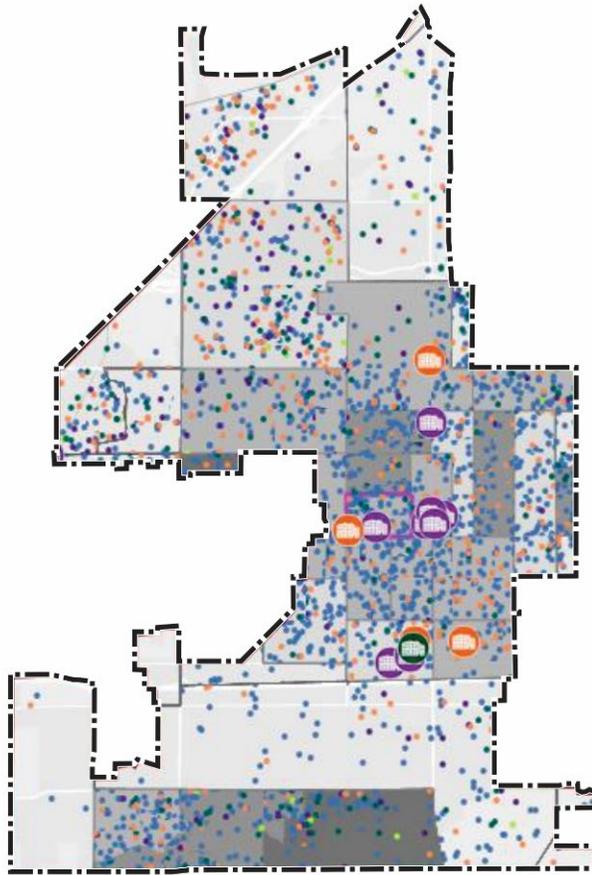
Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details

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

### Map II-VII Publicly Supported Housing



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b> <b>Name:</b> Map 5 - Publicly Supported Housing and Race/Ethnicity <b>Description:</b> Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color <b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG) <b>Region:</b> Riverside-San Bernardino-Ontario, CA <b>Data Version:</b> AFFHT0004			<b>Jurisdiction</b> Jurisdiction <b>Region</b> Region <b>Public Housing</b> Public Housing Scattered Sites <b>Other Multifamily</b> Other Multifamily <b>Project-Based Section 8</b> Project-Based Section 8 <b>Low Income Housing Tax Credit</b> Low Income Housing Tax Credit <b>Demographics 2010</b> 1 Dot = 75 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic <b>TRACT</b> TRACT <b>R/ECAP</b> R/ECAP <b>Percent Voucher Units</b> < 3.99 % 3.99 % - 7.16 % 7.16 % - 11.29 % 11.29 % - 17.3 % 17.3 % - 100 % Percent Voucher Units: Data not Available Percent Voucher Units: Data not Available		



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### *Housing Problems*

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

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

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

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

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

According to the data in **Table II-XII** and **Map II-VIII** below, the total number of households within the jurisdiction is 48,134. Of those households, 26,960, or 56.01 percent, experience housing problems. Among those 26,960 households experiencing problems, 15,500, or 32.02 percent of the total, experience severe housing problems. These percentages are roughly in line with the region, wherein the incidences of housing problems and severe housing problems are 49.19 percent and 27.82 percent respectively. Additionally, as is true in the region, Hispanic and Black households within the jurisdiction experience housing problems and severe housing problems at higher rates than the average. Specifically 63.98 percent of Hispanics and 55.14 percent of Blacks experience housing problems, while 40.07 percent of Hispanics and 27.43 percent of Blacks experience severe housing problems. While these rates do not qualify as disproportionate rates, as they are not 10 percent higher than the regional average, they nonetheless are rather significant.

**Table II-XII  
Demographics of Houses with Disproportionate Housing Needs**

Disproportionate Housing Needs	(Fontana, CA CDBG, HOME, ESG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
<b>Race/Ethnicity</b>						
White, Non-Hispanic	3,995	10,570	37.80%	248,500	615,660	40.36%
Black, Non-Hispanic	3,035	5,504	55.14%	56,215	96,380	58.33%
Hispanic	17,779	27,789	63.98%	276,310	469,370	58.87%
Asian or Pacific Islander, Non-Hispanic	1,528	3,218	47.48%	37,085	75,739	48.96%
Native American, Non-Hispanic	60	105	57.14%	2,874	5,864	49.01%
Other, Non-Hispanic	575	960	59.90%	12,120	24,015	50.47%
<b>Total</b>	<b>26,960</b>	<b>48,134</b>	<b>56.01%</b>	<b>633,100</b>	<b>1,287,025</b>	<b>49.19%</b>
<b>Household Type and Size</b>						
Family households, <5 people	12,895	25,800	49.98%	310,890	715,300	43.46%
Family households, 5+ people	10,355	15,409	67.20%	160,795	249,069	64.56%
Non-family households	3,700	6,904	53.59%	161,420	322,655	50.03%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
<b>Race/Ethnicity</b>						
White, Non-Hispanic	1,760	10,570	16.65%	122,935	615,660	19.97%
Black, Non-Hispanic	1,510	5,504	27.43%	32,125	96,380	33.33%
Hispanic	11,134	27,789	40.07%	174,310	469,370	37.14%
Asian or Pacific Islander, Non-Hispanic	800	3,218	24.86%	20,279	75,739	26.77%
Native American, Non-Hispanic	0	105	0.00%	1,499	5,864	25.56%
Other, Non-Hispanic	295	960	30.73%	6,870	24,015	28.61%
<b>Total</b>	<b>15,500</b>	<b>48,134</b>	<b>32.20%</b>	<b>358,025</b>	<b>1,287,025</b>	<b>27.82%</b>

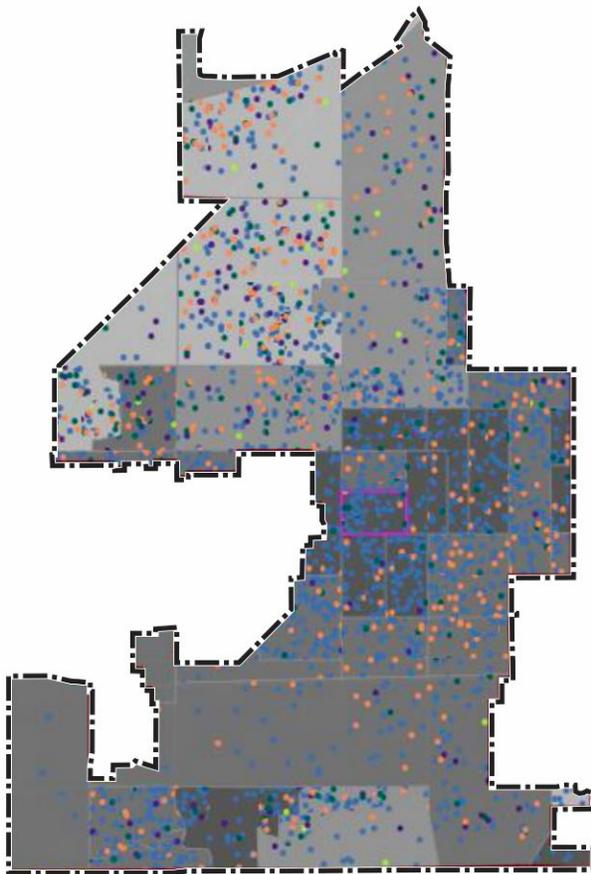
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost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

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

Note 3: Data Sources: CHAS

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

Map II-VIII  
Housing Burden by Race and Ethnicity



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b>					
<b>Name:</b> Map 6 - Housing Problems			<b>Jurisdiction</b> □		
<b>Variation:</b> Housing Burden and Race/Ethnicity			<b>Region</b> □		
<b>Description:</b> Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density			<b>Demographics 2010</b> 1 Dot = 75		
<b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG)			<ul style="list-style-type: none"> <li>○ White, Non-Hispanic</li> <li>○ Black, Non-Hispanic</li> <li>○ Native American, Non-Hispanic</li> <li>○ Hispanic</li> <li>○ Asian/Pacific Islander, Non-Hispanic</li> <li>○ Non-Hispanic</li> <li>○ Hispanic</li> <li>○ Other, Non-Hispanic</li> <li>○ Multi-racial, Non-Hispanic</li> </ul>		
<b>Region:</b> Riverside-San Bernardino-Ontario, CA			<b>TRACT</b> □		
<b>Data Version:</b> AFFHT0004			<b>R/ECAP</b> □		
			<b>Percent Households with Burden</b>		
			□ < 35.96 %		
			□ 35.96 % - 44.82 %		
			□ 44.82 % - 53.33 %		
			□ 53.33 % - 63.29 %		
			□ 63.29 % - 100 %		
			<b>Percent Households with Burden: Data not Available</b> □		



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Complementing these numbers is the information regarding households with severe housing cost burdens, which is shown in **Table II-XIII**. HUD defines a severe housing cost-burden as any home which must spend over 30 percent of their income on housing, such that paying for may have difficulty affording necessities such as food, clothing, transportation, and medical care. While the percentage of houses with problems is generally greater in the jurisdiction than in the region, the same is not true for homes with a housing cost burden. When it comes to the city of Fontana, both the demographic breakdown of households bearing such costs, as well as the total number of homes in such a situation, is consistent with the regions averages.

**Table II-XIII  
Demographics of Households with Severe Housing Cost Burdens**

Households with Severe Housing Cost Burdens	(Fontana, CA CDBG, HOME, ESG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity						
White, Non-Hispanic	1,550	10,570	14.66%	109,075	615,660	17.72%
Black, Non-Hispanic	1,335	5,504	24.26%	28,670	96,380	29.75%
Hispanic	6,885	27,789	24.78%	112,350	469,370	23.94%
Asian or Pacific Islander, Non-Hispanic	560	3,218	17.40%	16,065	75,739	21.21%
Native American, Non-Hispanic	0	105	0.00%	1,145	5,864	19.53%
Other, Non-Hispanic	195	960	20.31%	5,605	24,015	23.34%
Total	10,525	48,134	21.87%	272,910	1,287,025	21.20%
<b>Household Type and Size</b>						
Family households, <5 people	5,650	25,800	21.90%	140,335	715,300	19.62%
Family households, 5+ people	3,075	15,409	19.96%	46,785	249,069	18.78%
Non-family households	1,779	6,904	25.77%	85,810	322,655	26.59%

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

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

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

Note 4: Data Source: CHAS

Note 5: Refer to the Data Documentation for details

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

*Environmental Health Index*

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

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

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

**Table II-XIII** presents the Environmental Health Index values for various groups within Upland and within the region at large. Across every category, including those results reported for communities below the federal poverty level, Upland scores are significantly lower than those for the region. These lower scores are an indication of significantly greater exposure to cancer risks for City residents and of the potential for elevated non-cancer health effects from pollutants such as diesel particulate matter.

Fontana shows low environmental index scores across the board, regardless of the race or income of the individual. The highest score on the index is for Asians, with a score of 40.6, which is close to the regional average of 42.38. That score is followed by Blacks, with a score of 37.02 compared to a regional score of 44.22. White residents have a score of 36.55, which is well below the regional average of 55.48. Native Americans experience a similarly large discrepancy, with a score of 30.84

in the jurisdiction compared to 56.24 in the region. Hispanic residents also are worse off in the jurisdiction, with a score of 29.67 compared to the regional 42.38. For communities living under the federal poverty level, the jurisdiction compares similarly unfavorably to the region: 29.20 vs. 56.84 for Whites; 28.13 vs. 44.86 for Blacks; 27.12 vs. 42.23 for Hispanics; 30.83 vs. 39.74 for Asians; and 15.30 vs. 50.63 for Native Americans.

### *Opportunity Indices*

In addition to Environmental Health, **Table II-XIII** also contains six additional opportunity indices: low poverty index, school proficiency index, labor market index, transit index, low transportation index, and the job proximity index. What follows is a summary of each of the jurisdiction's scores for these various indices as compared to the region's scores.

According to HUD, the low poverty index captures poverty in a given neighborhood or jurisdiction. The index considers the overall poverty rate of the area, and then converts that rate into a number between 0 and 100. The higher the score, the lower the area's exposure to poverty is. The jurisdiction's score for each category is above the region's average. Of particular note is the greater exposure that Black residents have to poverty in the jurisdiction, as the city's score of 59.74 for that group is well above the regional score of 42.80.

The school proficiency index uses test scores from fourth grade students to determine whether neighborhoods have high-performing, or low-performing, elementary schools. The higher the score, the higher the quality of elementary schools in the area. Compared to regional averages, the jurisdiction is performing either in line with, or slightly better than, than the region. However, despite this similarity, the jurisdiction is under-performing for schooling with respect to Hispanic children. Their score of 38.49 is almost 20 points lower than the highest score in the jurisdiction (61.30 for Asian students).

The labor market index is meant to convey the general strength of human capital and labor market engagement in a given area. Three factors determine an area's score for this index: the unemployment rate, the labor market participation rate (the total number of workers employed divided by the working age population), and the educational attainment of the census tract (percent with a bachelor's degree). The higher the score, the higher labor market engagement is. Compared to the regional scores, the jurisdiction is performing as expected with respect to labor market engagement. Each group's score is within five percent of the regional average.

The transit index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the score, the more likely residents are to utilize public transportation. Once again, the jurisdiction is performing similar to the region for this index. More importantly, use of transit is relatively consistent across each racial

group, suggesting that there does not exist a racial disparity in resident's reliance on, or use of, public transit.

The low transportation index is based on estimates of transportation expenses for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. CBSA). The higher the score, the lower the transportation cost for an area is. Continuing the trend, the jurisdiction is performing in line with the region when it comes to transportation costs. However, it is important to note that the disparity between transit use and transportation costs is worth examining. As the jurisdiction has high rates of people using public transit, yet has low scores for the transportation index, public transit may be overly expensive for some residents of the jurisdiction.

The final index, job proximity index, quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. The higher the score, the better access to employment opportunities is for a given area. While the jurisdiction is consistent with its opportunities for employment regardless of a resident's race, it falls well below the regional score for employment opportunities. Each racial category has a job proximity index of almost ten points lower than the regional average, which suggests the jurisdiction is lacking employment opportunities.

**Table II-XIII  
Opportunity Indicators by Race/Ethnicity**

(Fontana, CA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	55.01	51.70	32.66	43.51	27.44	41.25	36.55
Black, Non-Hispanic	59.74	54.84	33.72	44.22	25.94	40.14	37.02
Hispanic	41.67	38.49	21.95	47.53	34.19	38.02	29.67
Asian or Pacific Islander, Non-Hispanic	68.32	61.30	39.76	40.88	20.98	44.89	40.60
Native American, Non-Hispanic	48.19	42.72	25.11	46.52	31.18	39.55	30.84
<b>Population below federal poverty line</b>							
White, Non-Hispanic	39.37	38.73	23.09	48.69	36.17	43.44	29.20
Black, Non-Hispanic	43.62	35.03	24.45	47.77	35.21	38.35	28.13
Hispanic	29.83	32.52	17.67	50.69	41.71	39.11	27.12
y	56.42	50.88	35.16	48.36	31.68	45.67	30.83
Native American, Non-Hispanic	31.40	24.89	15.15	52.19	38.93	38.48	15.30
<b>(Riverside-San Bernardino-Ontario, CA) Region</b>							
<b>Total Population</b>							
White, Non-Hispanic	52.61	50.65	34.50	37.96	25.75	49.50	55.48
Black, Non-Hispanic	42.80	41.50	27.18	42.55	31.82	49.72	44.22
Hispanic	37.51	37.99	24.20	43.12	32.68	47.81	42.38
Asian or Pacific Islander, Non-Hispanic	60.42	56.42	43.02	41.92	29.18	48.25	42.29
Native American, Non-Hispanic	41.19	40.74	25.06	36.84	26.34	50.16	56.24
<b>Population below federal poverty line</b>							
White, Non-Hispanic	38.39	42.36	25.55	38.74	29.20	49.95	56.84
Black, Non-Hispanic	27.15	30.84	17.39	43.48	34.78	48.95	44.86
Hispanic	23.78	31.06	16.42	44.76	36.54	49.34	42.23
Asian or Pacific Islander, Non-Hispanic	42.30	43.14	30.51	45.00	37.05	51.32	39.74
Native American, Non-Hispanic	30.24	34.37	20.61	39.17	32.05	52.23	50.63

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

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

### E. Special Housing Needs Profile

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

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

#### Senior Citizens

According to the 2010 Census, 5.56 percent of Fontana’s residents were seniors, defined as persons age 65 or older. This statistic represents an increase from the 4.87 percent of the population that were seniors in 2000. Seniors comprise a significant and growing contingent of Fontana residents, who need accommodation in the area of housing, due to limited income and higher disability rates, including ambulatory and other disabilities that require significant retrofitting of housing units.

#### *People with Disabilities*

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

**Table II-XIV**  
**Disability by Type**

	(Fontana, CA CDBG, HOME, ESG) Jurisdiction		(Riverside-San Bernardino- Ontario, CA) Region	
Disability Type	#	%	#	%
Hearing difficulty	3,776	2.07%	125,033	3.20%
Vision difficulty	3,192	1.75%	86,934	2.23%
Cognitive difficulty	7,467	4.10%	170,114	4.36%
Ambulatory difficulty	8,840	4.85%	241,262	6.18%
Self-care difficulty	3,907	2.14%	102,841	2.63%
Independent living difficulty	6,360	3.49%	170,490	4.37%

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

Note 2: Data Sources: ACS

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

In terms of disabilities, 1.37 percent of City residents between the ages of 5 and 7 have disabilities. As shown in **Table II-XV** below, the largest share of disabled persons within the City is between the ages of 18 and 64 and represents 5.55 percent of the total population. At 10,112, this number represents 8.4 percent of the 120,366 City residents within this age group. By comparison, the 5,388 disabled persons over 65 represent nearly half the total of 10,899 elderly persons within the community.

**Table II-XV  
Disability by Age Group**

	(Fontana, CA CDBG, HOME, ESG) Jurisdiction		(Riverside-San Bernardino- Ontario, CA) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	2,498	1.37%	37,092	0.95%
age 18-64 with Disabilities	10,112	5.55%	241,640	6.19%
age 65+ with Disabilities	5,388	2.96%	174,002	4.46%

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

Note 2: Data Sources: ACS

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

**Table II-XV** reveals that that the City of Fontana has 12,610 disabled residents ages 5 to 64, and another 5,388 elderly residents with disabilities. **Table II-XIV** shown above reveals the numbers living with each different type of disability within the community. The fact that total exceeds the numbers of disabled reported in census and ACS data implies that individuals report multiple types of disability. According to **Table II-XVI**, the Fontana Housing Authority accommodates the highest number of disabled individuals in the Housing Choice Voucher program, 84.2 percent of 203 units, or 171 units with disabled residents.

Interestingly, unlike other demographic factors analyzed in this report, the jurisdiction does not have a concentration of persons with disabilities in any singular location. As seen by **Map II-IX**, the 17,998 persons with disabilities within the jurisdiction are spread out across the city. There is no singular location that appears to hold a disproportionate, or significantly higher, percentage of persons with disabilities.

**Table II-XVI**  
**Disability by Publicly Supported Housing Program Category**

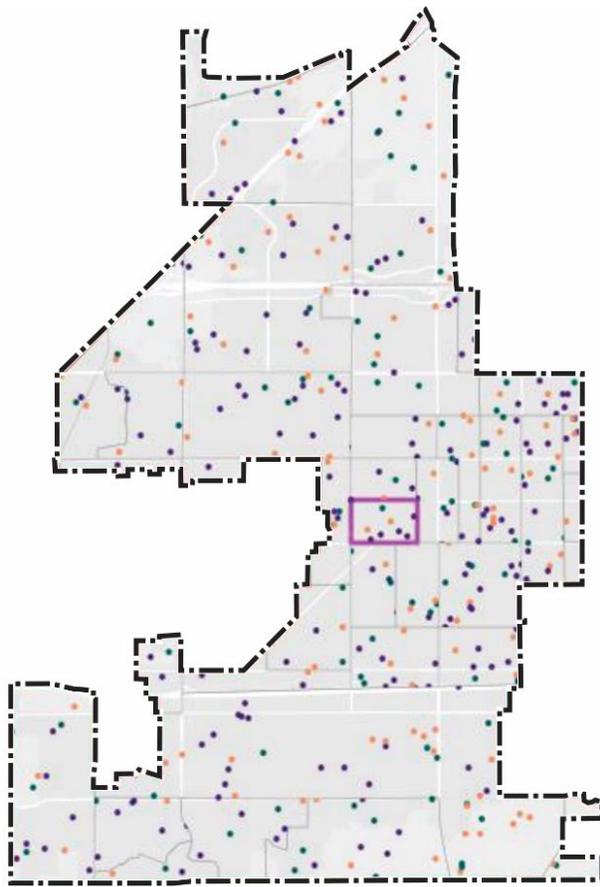
<b>(Fontana, CA CDBG, HOME, ESG) Jurisdiction</b>	<b>People with a Disability</b>	
	<b>#</b>	<b>%</b>
Public Housing	N/a	N/a
Project-Based Section 8	31	8.76%
Other Multifamily	1	1.69%
HCV Program	171	20.63%
<b>(Riverside-San Bernardino-Ontario, CA) Region</b>		
Public Housing	82	12.75%
Project-Based Section 8	520	9.86%
Other Multifamily	73	3.35%
HCV Program	5,235	27.51%

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

Note 2: Data Sources: ACS

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

Map II-IX  
Persons with Disabilities



Map Info	Legend	TOC	Map Info	Legend	TOC
<b>Fontana (CDBG, HOME, ESG)</b> <b>Name:</b> Map 14 - Disability by Type <b>Variation:</b> Hearing, Vision and Cognitive Disability <b>Description:</b> Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region <b>Jurisdiction:</b> Fontana (CDBG, HOME, ESG) <b>Region:</b> Riverside-San Bernardino-Ontario, CA <b>Data Version:</b> AFFHT0004			<b>Jurisdiction</b> Jurisdiction <b>Region</b> Region <b>Disability</b> 1 Dot = 75 Hearing Disability Vision Disability Cognitive Disability <b>TRACT</b> TRACT <b>R/ECAP</b> R/ECAP		



CITY OF FONTANA



Equal access and choice in housing, or what is commonly known as fair housing opportunity, is covered by federal and State statutes, regulations, and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing on the basis of one or more protected classes. The twin goals of nondiscrimination and integration in housing are achieved through the actions of buyers, sellers, landlords, tenants, realtors, apartment associations, homeowner associations, condominium boards, insurers, builders, lenders, appraisers, home inspectors, cities, community benefit organizations, and the courts. This chapter provides an overview of the private sector housing industry in Fontana and its interrelationship with fair housing services.

### **A. Owner-Occupied Housing**

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

#### *Home Buying Process*

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

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

### *Advertising*

The first step in buying a home is to search for available housing through advertisements that appear in magazines, newspapers, or on the Internet. Advertising is a sensitive issue in the real estate and rental housing market because advertisements can intentionally or inadvertently signal preferences for certain buyers or tenants. Recent litigation has held publishers, newspapers, the Multiple Listing Service (MLS), real estate agents and brokers accountable for discriminatory ads.

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

- Suggest a preferred type of buyer or tenant household, e.g. “perfect for a young couple”;
- Use models that indicate a preference or exclusion of a type of resident, e.g. running a series of advertisements that only include photos of nuclear families, or that do not features persons of color or persons with disabilities;
- Publish advertisements or listings in certain languages, e.g. only advertising homes/apartment complexes in predominately Hispanic neighborhoods on Spanish-language radio stations;
- Restrict publication to certain types of media or locations so as to indicate a preference.

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

### *Lending*

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

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

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

### *Appraisals*

Banks order appraisal reports to determine whether a property is worth the amount of the loan requested. Generally, appraisals are based on sale prices of comparable properties in the surrounding neighborhood of the subject property. Other factors such as the age of the structure, improvements made and location are also considered. Homes in some neighborhoods with higher concentrations of minorities and poverty concentrations may appraise lower than properties of similar size and quality in neighborhoods with lower concentrations of minorities or low-income households.

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

### *Real Estate Agents*

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

### *Sellers*

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

### *Insurance*

Insurance agents have underwriting guidelines that determine whether or not a company will sell insurance to a particular applicant. Currently, underwriting guidelines are not public information; however, consumers have begun to seek access to these underwriting guidelines to learn if certain companies have discriminatory policies, called redlining. Some states require companies to file the underwriting guidelines with the State Department of Insurance, making the information public. Texas mandates this reporting and has made some findings regarding discriminatory insurance underwriting.

Many insurance companies have traditionally applied strict guidelines, such as not insuring older homes, that disproportionately affect lower income and minority households that can only afford to buy homes in older neighborhoods. A California Department of Insurance (CDI) survey found that less than one percent of the homeowner's insurance available in California is currently offered free from tight restrictions. The CDI has also found that many urban areas are underserved by insurance agencies.

### *Home Loan Activity*

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

In tandem with the Home Mortgage Disclosure Act (HMDA), financial institutions with assets exceeding \$10 million are required to submit detailed information on the disposition of home loans by applicant characteristics. HMDA data can then be evaluated with respect to lending patterns.

During Calendar Year 2017, 2,730 households filed loan applications for housing in Fontana. Of those applications, 584 were withdrawn before approval or denial and 203 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 4,103 loan applications. The data in **Table III-1** shows that the number of loan applications is highest for refinancing at 53.1 percent of all loans, followed by loans for home purchase at 36.4 percent of the total and a mere 10.2 percent of all loans for home improvement. Approval rates were greatest for loans for home purchase at 80.3 percent, was modest for refinancing loans at 57.8 percent approval, and lowest for home improvement with 43.2 percent approval rates. Conventional loans were most common for all loan purposes. The average loan approval rate for all loan types and loan purposes was 64.5 percent.

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

Type	Number of Loan Applications	Share of Loan Applications	Number Approved	Approval Rate
<b>Home Purchase</b>	<b>712</b>	<b>36.64%</b>	<b>572</b>	<b>80.34%</b>
Conventional	375	19.30%	302	80.53%
FHA - Insured	272	14.00%	225	82.72%
VA - Guaranteed	63	3.24%	43	68.25%
FSA/RHS	2	0.10%	2	100.00%
<b>Home Improvement</b>	<b>199</b>	<b>10.24%</b>	<b>86</b>	<b>43.22%</b>
Conventional	180	9.26%	74	41.11%
FHA - Insured	14	0.72%	8	57.14%
VA - Guaranteed	5	0.26%	4	80.00%
FSA/RHS	0	0.00%	0	0.00%
<b>Refinancing</b>	<b>1,032</b>	<b>53.11%</b>	<b>596</b>	<b>57.75%</b>
Conventional	737	37.93%	429	58.21%
FHA - Insured	207	10.65%	123	59.42%
VA - Guaranteed	88	4.53%	44	50.00%
FSA/RHS	0	0.00%	0	0.00%
<b>Total:</b>	<b>1,943</b>	<b>100.00%</b>	<b>1,254</b>	<b>64.54%</b>

Source: 2017 HMDA Database

*Mortgage Interest Rates & Fees*

A key component to securing a home loan is the interest rate and fees associated with the loan. In 2018, *Housing Policy Debate*<sup>1</sup> published an article authored by Jacob William Fabor

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

which looked at the “Racial Inequality in a Recovered Mortgage Market.” Through their analysis, Fabor was able to isolate a discrepancy not only in loan acceptance rates between various races and ethnicities, but also in the interest rates given to those accepted loans. Fabor found that black applicants were more likely to be charged higher than rates than their white counterparts.

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

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

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

### *Lending Outcomes*

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

**Lending Outcomes by Income and Race/Ethnicity.** Generally, home loan approval rates increase as household income increases. This was true for nearly every type of loan analyzed for upper income applicants. However, approval rates declined in every type of loan analyzed when comparing middle income applicants to low income applicants. **Table III-2** shows loan approval rates for home purchases and refinances by applicant characteristics.

While it is dangerous to ascribe discriminatory intent from the loan data presented, it is noteworthy that African-Americans had approval rates below the average approval rate for each income level across each loan category. Asians had approval rates below the average

approval rate in six of the nine measures. They had below average approval rates for middle income home purchase loans, upper income home purchase loans, low income home improvement loans, upper income home improvement loans, middle income refinance loans, and upper income refinance loans.

Differences in approval rates for home loan applications among minorities do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the persistence of lower loan approval rates among minorities could be the subject of additional inquiry and examination.

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

Type	Low/Mod Income		Middle Income		Upper Income	
	<80% MFI		80-120% MFI		120+ MFI	
Race/ Ethnicity	Loan Applications	Approval Rate	Loan Applications	Approval Rate	Loan Applications	Approval Rate
<b>Home Purchase</b>	<b>123</b>	<b>82.11%</b>	<b>175</b>	<b>77.14%</b>	<b>424</b>	<b>81.60%</b>
Hispanic	37	59.46%	114	74.56%	157	80.89%
White	6	66.67%	16	81.25%	72	79.17%
Asian	7	85.71%	9	66.67%	34	73.53%
African American	3	33.33%	13	69.23%	53	66.04%
All Others	0	0.00%	4	100.00%	19	89.47%
Decline or N/A	70	97.14%	19	94.74%	89	95.51%
<b>Home Improvement</b>	<b>45</b>	<b>42.22%</b>	<b>51</b>	<b>33.33%</b>	<b>105</b>	<b>47.62%</b>
Hispanic	19	36.84%	22	27.27%	44	43.18%
White	6	33.33%	7	42.86%	13	61.54%
Asian	2	0.00%	4	75.00%	3	33.33%
African American	5	40.00%	5	20.00%	19	47.37%
All Others	0	0.00%	3	0.00%	0	0.00%
Decline or N/A	13	61.54%	10	40.00%	26	50.00%
<b>Home Refinance</b>	<b>315</b>	<b>60.95%</b>	<b>257</b>	<b>54.47%</b>	<b>478</b>	<b>57.53%</b>
Hispanic	129	48.84%	113	55.75%	136	54.41%
White	39	35.90%	40	45.00%	71	53.52%
Asian	7	71.43%	7	42.86%	25	48.00%
African American	20	55.00%	24	41.67%	54	38.89%
All Others	3	33.33%	3	66.67%	25	44.00%
Decline or N/A	117	83.76%	58	62.07%	167	71.26%

Source: HMDA Database 2017

**Lending Outcomes by Tract Characteristics.** The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of

entire communities, including low- and moderate-income neighborhoods. Analyzing lending patterns by neighborhood characteristics can show whether significantly fewer home loans are being approved or issued in low/moderate income neighborhoods or neighborhoods with a disproportionately high percentage of minority residents. The lack of lending activity in one or more neighborhoods has been linked to unequal access to credit among different race and ethnic groups and alleged practices of redlining and discrimination.

**Table III-3** shows a comparison of home purchase and refinance loan approval rates at the census tract level by the minority concentration in the tract as well as tract income level relative to the Area Median Income. Fontana is a multi-cultural community with neighborhoods that reflect the City’s demographics.

**Table III-3  
Home Loan Approval Rates by Tract Characteristics**

Tract Characteristics	Home Purchase Loans			Home Refinance Loans		
	Number of Applications	Number Approved	Percent Approved	Number of Applications	Number Approved	Percent Approved
<b>Minority Percentage</b>						
20% to 50%	26	23	88.46%	29	24	82.76%
50% to 80%	276	223	80.80%	392	218	55.61%
80% +	409	326	79.71%	603	347	57.55%
<b>Tract Income</b>						
Low	117	101	86.32%	145	100	68.97%
Middle	256	207	80.86%	409	240	58.68%
Upper	889	671	75.48%	339	264	77.88%

Source: HMDA data, 2017.

*Predatory Lending*

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

The Fair Housing Act of 1968 prohibits discrimination in the making or purchasing of loans, or in providing of other financial assistance, or the terms and conditions of such financial assistance for the purpose of purchasing, constructing, improving, repairing, or maintaining a dwelling because of race, religion, color, national origin, sex, family status, or disability. The Equal Credit Opportunity Act of 1972 also requires equal treatment in loan terms and

availability of credit for all of the above categories, as well as age and marital status. Lenders would be in violation of these acts, if they target minority or elderly households to buy higher-priced loan products, treat loans for protected classes differently, or have policies or practices that have a disproportionate effect on the protected classes.

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

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

### *Foreclosures*

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

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

high rates of foreclosure. Property values declined significantly—in some cases to pre-2000 levels.

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

The high incidence of foreclosure and the housing crisis in general represented a system-wide collapse of the housing market that resulted in numerous national, state and local efforts to reform virtually every aspect of housing acquisition and finance.

A decade has now passed since the foreclosure crisis began, and the housing market has rebounded. ATTOM Data Solutions recently announced its Fiscal Year 2018, 3<sup>rd</sup> Quarter numbers, which show that foreclosure filings are down 6 percent from the previous quarter, down 8 percent from the third quarter last year, and were at their lowest levels since the fourth quarter of Fiscal Year 2005.<sup>2</sup> Not only are foreclosure filings down for the last quarter, foreclosure filings have been below the pre-recession average for eight consecutive quarters. However, that same report indicates that there is still a relatively modest, but widespread, foreclosure risk associated with FHA loans originated in 2014 and 2015, exceeding the long-term average foreclosure rates for all FHA loans. Overall, the housing market seems to have recovered from the recent crisis.

#### *Agency Coordination*

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

**National Association of Realtors (NAR).** The National Association of Realtors (NAR) is a consortium of realtors which represent the real estate industry at the local, state, and national level. Locally, the Inland Valleys Association of Realtors (IVAR) is the main association that serves the City of Fontana. As a trade association, members receive a range

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

of membership benefits. However, in order to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term Realtor thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics.

Realtors subscribe the NAR's Code of Ethics, which imposes obligations upon Realtors regarding their active support for equal housing opportunity. Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin." Realtors shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status, or national origin."

The NAR has created a diversity certification, "At Home with Diversity: One America" to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR "At Home with Diversity" course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today's real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan. In July 1999, the NAR Diversity Program received the HUD "Best Practices" award.

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

**Realtor Associations Serving Fontana.** Realtor associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies among these associations, and local association membership is generally determined by where the broker is located. Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as detailed

statistics of the education/services these agencies provide or statistical information pertaining to the members is rarely available. IVAR serves the Fontana area.

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

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

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

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

## **B. Rental Housing**

Similar to the owner-occupied market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. Stages in the process of renting a home include advertising, pre-application inquiries, viewing the apartment, criteria for qualifying

for the lease, lease conditions, and administration of the lease. The process becomes even more difficult and subjective in a tight rental market, where the landlord has numerous options for choosing the future tenant based on subjective factors.

### *The Rental Process*

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

### *Advertising*

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

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

### *Viewing the Unit*

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

decision to rent the unit. The opportunity for the potential renter to view the unit, is also an opportunity for the landlord to view the potential tenant and make value judgments based on their appearance or personal characteristics.

#### *Qualifying for the Lease*

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

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

#### *The Lease*

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

#### *Rental Housing Services*

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

- **Community-Based Mediation.** IFHMB provides trained mediators to provide education and information regarding rights and responsibilities under the California Landlord-Tenant laws and help to resolve conflicts between landlords and tenants (including mobile homes). IFHMB contracts with San Bernardino County to provide mediation in small claims and unlawful detainer lawsuits in County courts.
- **Education/Outreach.** IFHMB provides education and outreach services to landlords and tenants, Realtors, newspapers, service organizations, schools, persons with Limited English Proficiency, and others interested in learning about fair housing laws. IFHMB also provides HUD-certified counseling to homeowners who are delinquent on FHA loans or seniors interested in reverse equity mortgage loan programs. Fair housing workshops and newsletters are also provided on a quarterly basis.
- **Senior Services.** IFHMB actively and successfully mediates conflicts between seniors and Social Security, Medi-Cal, utility companies, collection agencies, neighbors, and others. IFHMB also provides a Care Referral Service, offers help in filing for HEAP and Homeowner/Renter Assistance, and maintains a list of senior housing and care homes.
- **Alternative Dispute Resolution.** The California Dispute Resolution Programs Act of 1986 provides the authority for mediation in the court system. Inland Fair Housing and Mediation Board has a contract with the County of San Bernardino to provide mediation in civil, family, probate, small claims, and unlawful detainer lawsuits in all of the courts in San Bernardino County.
- **Mobile Home Mediation.** IFHMBs mediators are trained to handle the specialized problems based on the Mobile Home Residency Law (MRL) that reflects the dual ownership and unique life style of mobile home communities. They provide education and information to residents and parks about the MRL, as well as provide information to both sides when fair housing issues are presented, and when requested serve as neutral third parties to facilitate resolution of conflicts.

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

City, to enforce their rights.

**Table III-4  
General Housing Inquiries (Rental)**

Inquiry Category	Number of Inquiries	Number of Residents Affected
Repairs	64	260
Eviction	130	482
Rent increase	21	74
Management Problems	1	2
Neighbor-to-Neighbor Disputes	1	1
Rules & Regulations	3	9
Security Deposit	23	90
Tenancy Term	1	2
Shared Utilities	1	1
Illegal Entry	0	0
Right and Responsibilities	97	258
Foreclosure	1	7
Fees	0	0
Maintenance	1	5
<b>Totals</b>	<b>344</b>	<b>1,191</b>

Source: IFHMB for the City of Fontana, 2019.

An evaluation of the volume of inquiries by topic as listed in **Table III-4** reveals a significant number of inquiries regarding eviction, rights and responsibilities, and repairs. These are common landlord-tenant matters that IFHMB provides professional advice to both landlords and tenants so that both parties have the opportunity to conduct business in accordance with the law. In some cases, incidences of discrimination are discovered as a result of a general housing inquiry.

#### *Agency Coordination*

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

#### *California Apartment Association (CAA)*

CAA is the country's largest statewide trade association for rental property owners and managers. Incorporated in 1941 to serve rental property owners and managers throughout California, CAA represents rental housing owners and professionals who manage more than

1.5 million rental units. CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with other courses.

*National Association of Residential Property Managers (NARPM)*

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

## A. Land Use Policy

### *General Plan*

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

- Residential Estate (R-E). This designation is intended for single-family homes requiring a minimum lot size of one half acre per dwelling unit.
- Single-Family Residential (R-1). This designation is intended for typical suburban detached single-family homes.
- Medium Density Residential (R-2). This designation is intended for multiple-family, single-family attached, and single-family detached homes.
- Multiple-Family Residential (R-3). This designation is intended for duplexes, condominiums, town homes, and apartments.
- Multi-Family Medium High Residential (R-4). This designation is intended for apartments, stacked condominiums and studios. Mixed-use developments are permitted within this zone.
- Multi-Family High Residential (R-5). This designation is intended for multi-story apartments and mixed-use developments.
- Residential Planned Community (R-PC). This designation is intended for master planned communities offering a mix of residential housing types and amenities available for various economic segments of the population.
- Community Commercial and Regional Mixed Used (C-1, C-2, and RMU). This designation is intended as centers for employment generating commercial and industrial uses. Residential development at the Multi-Family density designation is permitted if the residential development is part of a project developed under Planned Community or Planned Development zoning, or with a Specific Plan.
- Boulevard Overlay (B). This designation is intended to apply in conjunction with the underlying land use designations, on identified stretches of Foothill Boulevard,

Arrow Highway, and Sierra Avenue. Residential development at the Medium and Multi-Family densities is encouraged to locate in mid-block locations that are not viable for commercial/activity center type development. Single family residential development such as town homes or other forms of “boulevard” style housing may also develop.

- Activity Center Overlay (A). This designation is intended to stimulate the development of intimately scaled activity centers within areas planned for residential development from Baseline Avenue to northern border of the City. Residential development at the Medium and Multi-Family density designations is permitted within this designation, if the residential development is part of a project developed under PC zoning, or with a Specific Plan.

**Table IV-1** shows each of the General Plan Land Use Designations and their respective acreages within the community.

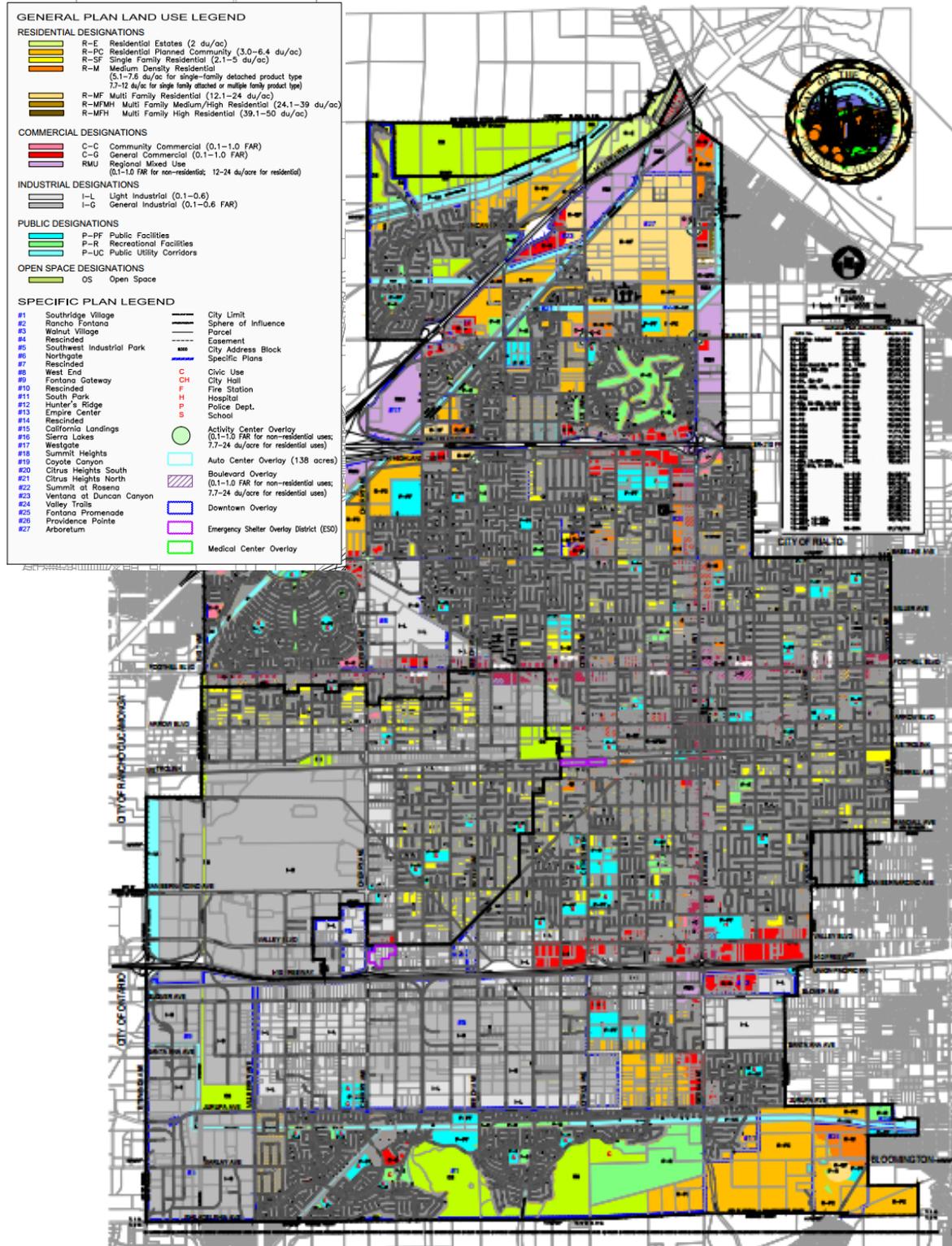
**Table IV-1  
General Plan Land Use Designations**

Land Use Designation	Description	Area (in acres)	% of Total
Residential Estate	Single-family homes.	0	0.0%
Single Family Residential	Detached single-family homes.	4,715	20.1%
Residential Planned Community	Master planned communities offering a mix of residential housing types and amenities.	7,155	30.6%
Medium Density Residential	Multiple-family; single-family attached; and single-family detached.	850	3.6%
Multiple Family Residential	Duplexes; condominiums; town homes; and apartments.	267	1.1%
Multiple Family Medium High Residential	Multiple-family residential apartments, stacked condominiums and studios.	Not tabulated	-
Multiple Family High Residential	Multiple-family multi-story apartments and mixed-use developments.	Not tabulated	-
Regional Mixed Use	Centers for employment, generating commercial and industrial uses.	1,033	4.4%
Community/General Commercial	Retail; and office.	1,967	8.4%
Light/General Industrial	Warehousing/Distribution; light industrial; and manufacturing.	3,297	14.1%
Public Facilities	Public facilities.	944	4.0%
Recreation Facilities	Recreation facilities.	885	3.8%
Public Utility Corridors	Public utility corridors.	804	3.4%
Open Space	Open space.	908	3.9%
Freeways	Freeways	580	2.5%
<b>Total:</b>		<b>23,405</b>	<b>100.0%</b>

Source: City of Fontana Land Use Element, Amendment No. 06-006/Resolution No. 2009-90.

**Map IV-1** illustrates the City’s current land use designations.

Map IV-1: Citywide Land Use Map



Source: City of Fontana General Plan, 2015.

*Zoning Ordinance*

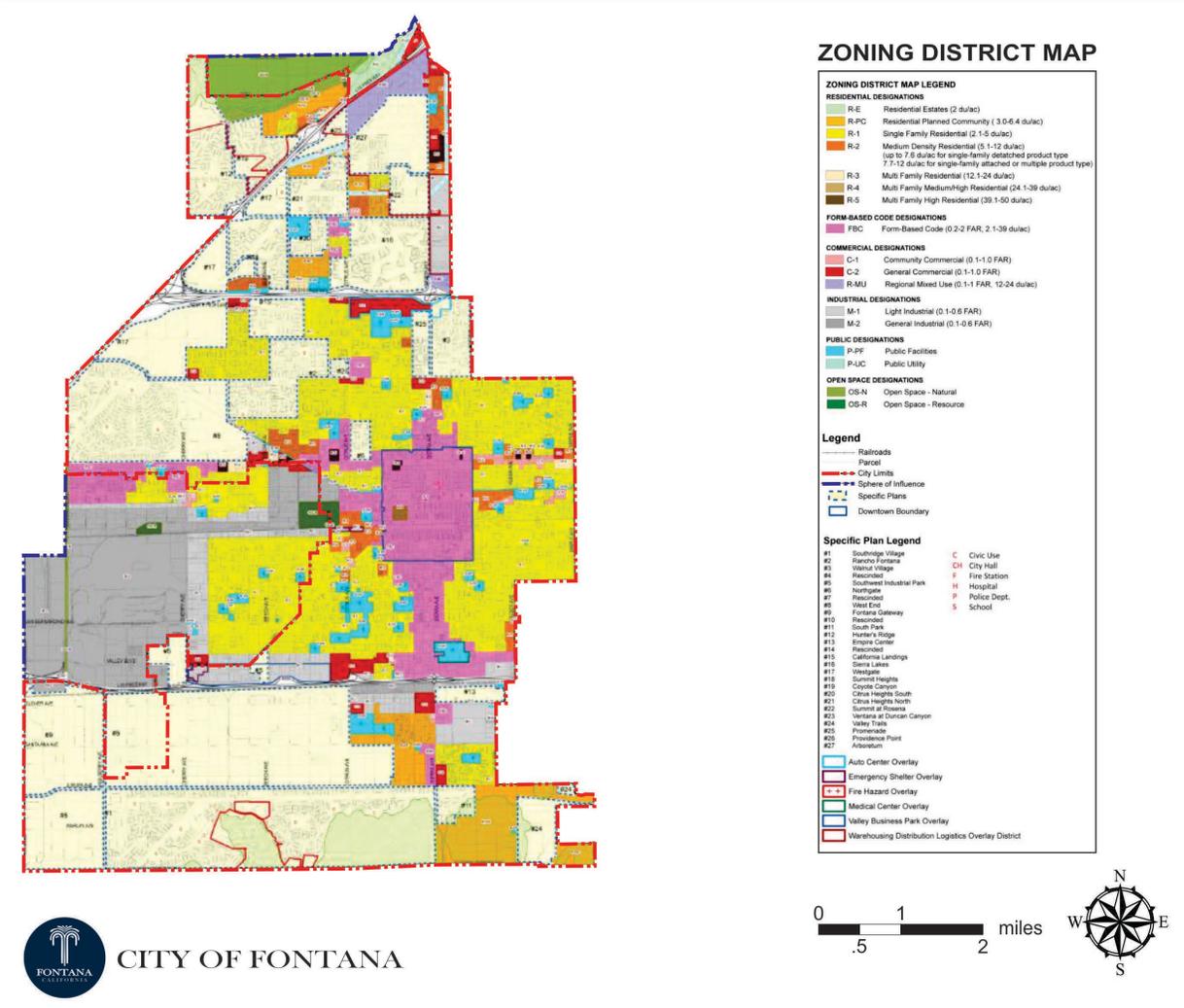
Chapter 30 of the Fontana’s Municipal Code sets forth the requirements of the City’s Planning and Zoning Ordinance. According to the Zoning Ordinance, its purpose, among other things, is to “encourage the most appropriate use of land and ensure compatibility between uses; provide open space for light, air, and the preservation of resources; facilitate the timely provision of adequate infrastructure and community facilities; Promote excellent architectural design; and promote health, safety, and general welfare of the citizens and visitors of Fontana.” The Zoning Ordinance contains the following zone districts with residential areas:

- R-E (Residential Estate) - This single-family zoning district permits low density uses, as well as accessory agricultural uses. This district applies primarily to outlying rural areas.
- R-1 (Single-family Residential) - This typical single-family zoning district permits detached residences on individual lots within defined neighborhoods.
- R-2 (Medium-density Residential) - This medium intensity, multiple-family zoning district permits the development of attached and detached single-family, duplex and multiple-family dwellings, as well as condominiums.
- R-3 (Multiple-Family Residential) - This most intense multiple-family zoning district permits development such as garden apartments, corridor apartments, condominiums and townhouses.
- R-4 (Multiple-Family Medium/High Density Residential) - This designation is intended to provide for multi-family residential developments commonly found in a dense urban environment within close proximity to public transit stations. Permitted uses include apartments, stacked condominiums and studios. Mixed-use developments are permitted within this zone.
- R-5 (Multiple-Family High Density Residential) - This designation is intended to provide for high-density residential transit-oriented development commonly found in urban environments, especially near existing and/or anticipated future bus routes. Permitted uses include multi-story apartments and mixed-use developments. (Zoning and Development Code, Chapter 30, Article V, Section 30-423)
- R-PC (Residential Planned Community) - A zoning district that provides for managed growth or master-planned communities offering a mix of residential housing types and amenities with an approved specific plan or low density residential uses similar to R-E above without a specific plan.

- RMU (Regional Mixed Use) - A zoning district that accommodates a wide range of retail commercial, office, light manufacturing, civic, and, under certain circumstances, residential uses to create vibrant activity centers with compatible activities.
- A (Activity Center Overlay District) - A district that is intended to encourage the development of clustered mixed-use activity centers that serve nearby neighborhoods. A combination of uses, including residential with retail and/or office, is required.

Map IV-2, following, shows the distribution of zone districts throughout the City.

Map IV-2  
Zoning Districts



Source: City of Fontana; updated 2019.

In addition to implementing and regulating the General Plan residential land use designations through the creation of various residential zone districts, the City of Fontana has 25 out of 28 Specific Plan areas that include single or multi-family housing uses, including:

- Arboretum Specific Plan
- Bellgrove Community Plan II
- California Landings
- Center Stone Community Plan
- Citrus Heights North Specific Plan
- Coyote Canyon Specific Plan
- Fontana Gateway Specific Plan
- Fontana Grandview Community Plan
- Fontana Promenade Specific Plan
- Fontana Star Community Plan
- Hunter's Ridge Specific Plan
- Morning Side Community Plan
- Northgate Specific Plan
- Providence Pointe Specific Plan
- Rancho Fontana Specific Plan
- Sierra Lakes Specific Plan
- South Park Specific Plan
- Southridge Village Specific Plan
- Summit Heights Specific Plan
- Summit at Rosena Specific Plan
- Valley Trails Specific Plan
- Ventana at Duncan Canyon Specific Plan
- Walnut Village Specific Plan
- West End Specific Plan
- West Gate Specific Plan

Specific Plans provide added flexibility from residential development standards established in the Zoning Ordinance. Specific Plans provide focused planning and development standards tailored to the unique site characteristics or project purpose.

### *Housing Element*

The Housing Element is one (1) of seven (7) mandated elements of Fontana's General Plan. The State of California housing element law, enacted in 1969 and recently amended in 2008 by Senate Bill 2, requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of their community. The stated focus of the Fontana 2014-21 Housing Element is to provide a detailed analysis and comprehensive

evaluation of the City's progress in implementing the past policy and action programs related to housing production, preservation, conservation and rehabilitation.

The Housing Element seeks to provide local implementation of the Statewide housing goal, "...of a decent home and a satisfying environment for every Californian", which accommodates its designated Regional Housing Needs Assessment or RHNA allocation. All the cities and counties in San Bernardino County have been allocated certain housing growth objectives that will enable the region to meet its projected housing needs in the coming years. The Southern California Association of Governments (SCAG) has been delegated with the responsibility in developing regional growth forecasts and then assigning new housing objectives for each city and county under SCAG's jurisdiction. In addition to establishing an overall objective for new housing units for the defined planning period (2014-21), the SCAG RHNA also indicated the proportion of future housing units that should be accessible to households with varying incomes. The RHNA that is applicable to Fontana is summarized below:

- A total of 1,442 units should be allocated to very low-income households (less than 50 percent of the San Bernardino County median income);
- A total of 974 units should be provided for low-income (50 percent – 80 percent of the median income) households;
- A total of 1,090 units should be provided for moderate-income (80 percent - 120 percent of the median income) households; and
- A total of 2,471 units should be provided for households with above-moderate (more than 120 percent of the median income for the county incomes.
- The total number of new housing units that will need to be added to the city's housing inventory during the 2014-21 planning period is 6,385 units.

The Housing Element also describes various housing programs intended to facilitate meeting the objectives described above. Where relevant to this Analysis of Impediments, housing programs that affect Fair Housing are described in this report.

Indicated in the January 2015 report from the State Department of Housing and Community Development (HCD), the 2014-21 Housing Element was reviewed on November 3, 2014 and is in compliance with State Law. It was adopted by the City on February 11, 2014.

### *Housing Opportunities*

Housing Element law requires that cities facilitate and encourage the provision of a range in types and prices of housing for all economic and special needs groups. Local government

policies that limit or exclude housing for persons with disabilities, lower income people, people who are homeless, families with children, or other groups may violate the Fair Housing Act. Cities must take these factors into account when regulating land use and development standards throughout its residential zones. **Table IV-3** highlights permitted residential uses in the City.

**Table IV-3  
Single-Family Housing Opportunities Permitted by Zone**

Housing	Residential Zones								
	R-E	R-1	R-2	R-3	R-4	R-5	R-PC	B	A
Single-Family Detached	P	P	P	P	P	P	P	CUP	P
Single-Family Attached	X	X	P	P	P	P	P**	CUP	P
Two-Family (Duplex)	X	X	P	P	-	-	P**	CUP	P
Multiple-Family	X	X	P	P	P	P	P**	CUP	P
Manufactured Home	P	P	P	P	P*	P*	P	CUP	P
Mobile Home Parks	P	P	P	P	-	-	P	X	X
Senior Housing	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP	P
Second Units	P	P	P	X	X	X	P	P	P
Live/Work <sup>1</sup>	X	X	X	X	X	X	X	CUP	CUP
Community Care Facilities (one to six persons)	P	P	P	P	X	X	P	CUP	P
Community Care Facilities (seven or more persons)	CUP	CUP	CUP	CUP	X	X	CUP	CUP	CUP
Emergency Shelter/ Transitional Housing <sup>2</sup>	X	X	X	X	X	X	X	X	X

Source: City of Fontana Zoning and Development Code, 2020.

P: Permitted by right

CUP: Requires Conditional Use Permit

\*Allowed subject to the single-family residential (R-1) development standards.

\*\*Allowed only as part of an approved specific plan.

X: Not permitted

1. Allowed in Retail, Transitional, Station, Downtown Gateway, Sierra Gateway, Route 66 Gateway, Valley

Gateway & Village zones.

2. Pursuant to Chapter 30, Article IV, Section 30-205(g) of the Zoning and Development Code, Homeless Shelters on an emergency or temporary basis are conditionally permitted in C-1 and C-2 zones when a Conditional Use Permit has been approved pursuant to the procedures outlined in Chapter 30, Article II, Division 7.

### *Single and Multi-family*

Detached single-family dwelling units are a permitted use in all residential zones. However, the City recognizes that this can have the effect of using up scarce land available for multi-family development with lower-density housing. As part of a focused Zoning Code amendment process to ensure compliance with the General Plan, the City will place minimum density limits on each residential zoning category. Multiple family residences with three (3) or more units, townhomes and condominiums are permitted by right in R-2, R-3 and Activity Center Overlay zones, permitted in planned communities as part of an approved Specific Plan, and are possible with a Conditional Use Permit in Boulevard Overlay zones. As discussed later in this chapter, HCD typically requires jurisdictions that require conditional use permits for multiple-family in residential zones to eliminate the requirement. The use of a conditional use permit can at times constrain the development of multiple-family housing, because the project is subject to a public hearing and can often be appealed to the City Council.

The City's most recent Housing Element identifies 2010 Impediment No. 9: Multi-Family Civil Rights Compliance. The City continues to examine and monitor all Housing Authority / City-owned multi-family residential properties to ensure compliance with Federal and contractual civil rights compliance requirements.

The City has addressed the impediment in a number of meaningful ways. In 2014, the City created two new multi-family residential zones, Multiple-Family Medium/High Density Residential (R-4) and Multiple-Family High Density Residential (R-5). (Ord. No. 1708, Exh. A, § 1, adopted 10-28-14) This latter zone is described in the Zoning and Development Code as "the most intense multiple-family residential zoning district and it provides space for high density residential transit-oriented development commonly found in an urban environment, especially along existing and/or anticipated future bus routes." (Chapter 30, Article V, Division 1, Section No. 30-423)

Evaluation of the latest General Plan Land Use and Zoning Maps (adopted September 10, 2019) indicates a conspicuous amount of land set aside for Multiple-Family High Density Residential (R-5, min. 39.1 dwelling units per acre) along the Foothill Boulevard corridor through the City's center. Most of these parcels are located within the General Plan's designation of "Walkable Mixed Use Corridor Downtown" or WMXU-1, and are visible on the map (**Map IV-2** above) as dark brown shaded areas. Their placement along this important walkable corridor within a planning priority area indicates a commitment to their redevelopment. Another of these areas is located north of the 210 Freeway in the northern

part of the City, where new housing construction is critical. The parcel is located on Sierra Avenue, north of Summit Avenue.

The City has also undertaken the inclusion of density bonus development standards as a means of encouraging multi-family residential development. (Article V, Division 4, Section No. 30-437) According to its amended Zoning and Development Code, "Density bonus standards allow for more intense residential development for the production of lower income housing units provided a project meets the provisions of Government Code Section No. 65915 of the State of California." The code also allows for "more intense residential development" in the form of High-Amenity Projects.

### *Condominium*

The City defines a condominium as a structure of two or more units, the interior spaces of which are individually owned; the balance of the property (both land and building) is owned in common by the owners of the individual units.

### *Manufactured Housing*

State law requires cities to permit manufactured housing and mobile homes on lots zoned for single-family detached dwellings provided that the manufactured home meets the location and design criteria established in the Zoning Ordinance. The City's Zoning Ordinance explicitly defines manufactured housing as follows:

"Manufactured home means a structure, transportable in one or more sections, which is built on a permanent chassis and is designed for use with or without a permanent foundation when attached to the required utilities. For floodplain management purposes, the term "manufactured home" also includes park trailers, travel trailers and other similar vehicles placed on a site for greater than 180 consecutive days.

Manufactured home park or subdivision means a parcel or contiguous parcels of land divided into two or more manufactured home lots for rent or sale." (Chapter 12, Article 2, Section 12-29)

The Ordinance states further, "Manufactured homes may be located on individual lots in all residentially zoned property lots and shall comply with all development standards of the zoning district in which it is located. In addition, the manufactured home shall be subject to the following requirements:

1. Shall be on a permanent foundation.
2. Shall have a two-car enclosed garage.
3. Shall have a roof overhang not to exceed 16 inches.
4. Shall be fire sprinklered.
5. Shall be architecturally compatible or superior to the existing homes in the

surrounding neighborhood.  
(Zoning Code Chapter 30, Article V, Section No. 30-460)

### *Mobile Home Parks*

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development. In compliance with State law, the City permits mobile homes parks, subject to a Conditional Use Permit, within the R-2 zone established in the Zoning Ordinance. The City has five (5) mobile home parks providing more than 700 affordable dwelling units.

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development.<sup>1</sup> The City's Municipal Code contains multiple references to mobile homes. Chapter 5, Buildings and Building Regulations states:

*"Mobile home means a structure transportable in one or more sections designed as a dwelling unit.*

*Mobile home park means an area consisting of approved mobile home lots which are rented or leased to accommodate mobile homes." (Article XIV, Section 5-393)*

Chapter 14, Housing, contains the following;

*"Mobile home means a vehicle, designed or used for human habitation, including a camping trailer, travel trailer, motor home, and slide-in camper, when used as the principal place of habitation for the occupants thereof as well as mobile homes as defined by Civil Code § 798.3.*

*Mobile home park means any area of land within the city where two or more spaces are rented or held out for rent, to accommodate mobile homes used for human habitation." (Article III, Section 14-58)*

The City of Fontana does not issue permits for mobile homes located in a mobile home park. Permits are issued by the State of California Department of Housing and Community

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<sup>1</sup>California Government Code § 65852.7

Development, which also conducts any required inspections. The City of Fontana will issue permits for the installation of a manufactured home installed on a permanent foundation. The cost of the permit is based on the valuation of the work needed to construct the permanent foundation and related construction activity.

In compliance with State law, the City permits mobile homes parks, subject to a Conditional Use Permit, within the R-2 zone. One website, describing itself as an on-line mobile home marketplace (mhvillage.com) lists as many as 20 mobile home parks in Fontana, some of which include:

- Aloha Mobile Home Park (8239 Cottonwood Avenue)
- Sunrise Mobile Home Park (8297 Cottonwood Avenue)
- Orangewood Park-Mobile Homes (8787 Locust Avenue)
- Fontana Mobile Home Park (15798 Slover Avenue)
- Bravo Mobile Home Park (4041 Pedley Road)
- Capri Mobile Estates (16860 Slover Avenue)
- Arrowhead Estates (17400 Valley Boulevard)

### *Accessory Units*

Enacted in 2002, AB1866 requires cities to use a ministerial process to consider and approve accessory units proposed in residential zones.<sup>2</sup> According to HCD, a local government must “...accept the application and approve or disapprove the application ministerial without any discretionary review...” In order for an application to be ministerial, the process must apply predictable, objective, fixed, quantifiable, and clear standards. These standards must be administratively applied to the application and not otherwise be subject to discretionary decision-making by a legislative body. The City allows accessory units in all single-family residential zones, permitted by right. Therefore, the City is in compliance with AB1866.

### *Residential Care Facilities*

The Lanterman Developmental Disabilities Services Act declares that mentally, physically, and developmentally disabled persons, children and adults who require supervised care are entitled to live in normal residential settings. State law requires that licensed residential care facilities serving six or fewer persons be treated as a residential use under zoning, be allowed by right in all residential zones, and not be subject to more stringent development standards, fees, taxes, and permit procedures than required of the same type of housing (e.g., single-family homes) in the same zone.<sup>3</sup> **Map IV-3 and Table IV-4** illustrates the distribution of such facilities throughout the City of Fontana.

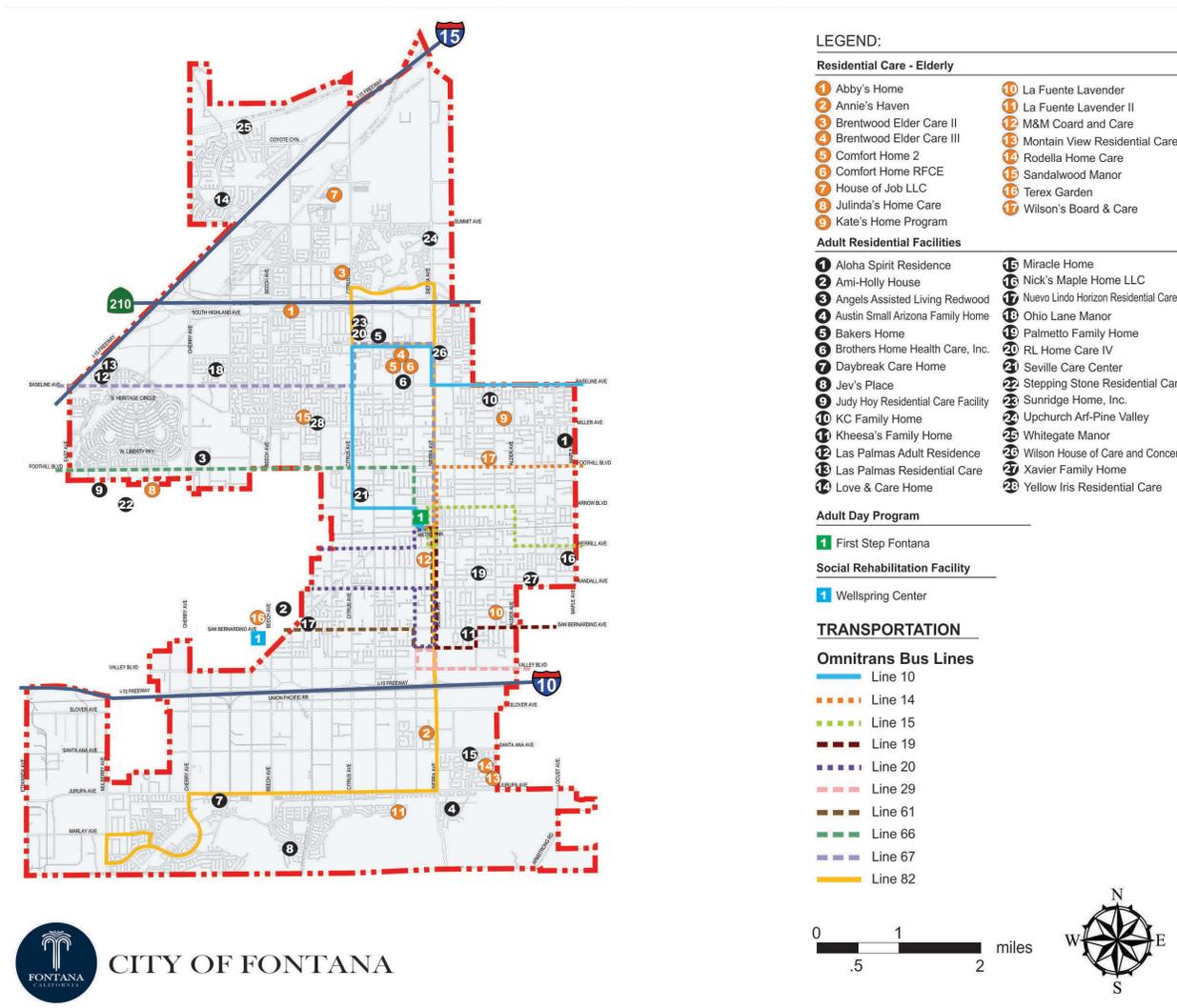
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<sup>2</sup>California Government Code § 65852.2

<sup>3</sup>Welfare and Institutions Code, §5000 et. seq. Health and Safety Code, §1500 et. seq.

The City allows licensed residential care facilities serving six or fewer clients as a permitted use in all residential zones. As shown in **Table IV-4**, Forty-seven (47) licensed residential care facilities provide accommodations to approximately 486 residents. The City permits small group or community care facilities in all residential zones subject to the issuance of a Conditional Use Permit. Six (6) of these facilities house more than 6 residents.

**Map IV-3  
Licensed Residential Care Facilities**



CITY OF FONTANA

Source: State of California 2019

**Table IV-4  
Licensed Adult Residential Care Facilities and Adult Day Care in Fontana**

No.	Facility	Address	Capacity
<b>Adult Residential Care Facility</b>			
1	Aloha Spirit Residence	7888 Dumond Drive	4
2	Ami-Holly House	15340 Holly Drive	5
3	Angels Assisted Living Redwood	8024 Redwood Avenue	32
4	Austin Small Arizona Family Home II	17049 La Vesu Road	6
5	Bakers Home	16646 Baseline	6
6	Brothers Home Health Care, Inc.	11302 Rockridge Lane	4
7	Daybreak Care Home	15446 Daybreak Lane	6
8	Jev's Place	8345 Durango	4
9	Judy Hoy Residential Care Facility	17049 Via Reata	4
10	KC Family Home	7470 Tamarind Avenue	4
11	Kheesa's Family Home	17269 San Bernardino Avenue	6
12	Las Palmas Adult Residence	7217 Las Palmas Drive	4
13	Las Palmas Residential Care	7128 Las Palmas Drive	6
14	Love & Care Home	5475 Arena Way	6
15	Miracle Home	10990 Blackwood Court	6
16	Nick's Maple Home LLC	9008 Maple Avenue	22
17	Nola Homes	5975 Forest Oaks Place	4
18	Nuevo Lindo Horizon Residential Care II	9695 Lime Court	6
19	Ohio Lane Manor	7122 Ohio Lane	4
20	Palmetto Family Home	9169 Palmetto Avenue	6
21	Pine Residential Care	17269 Pine Avenue	4
22	Seville Care Center	16186 Seville Avenue	6
23	Stepping Stone Residential Care	8502 Calabash Avenue	38
24	Sule's Loving Home	7640 Tokay Avenue	2
25	Sunridge Manor Inc.	6800 Sunridge Court	4
26	Upchurch ARF-PINE Valley	5855 Pine Valley Drive	5
27	Whitegate Manor	15050 Whitegate Lane	4
28	Wilson House of Care and Concern	7015 Sierra Avenue	3
29	Xavier Family Home	9255 Palm Lane	6
30	Yellow Iris Residential Care	7666 Yellow Iris Court	4
<b>Adult Day Care</b>			
31	First Step Fontana	8621 Juniper Avenue #101	(281)60
<b>Elderly Assisted Living</b>			

No.	Facility	Address	Capacity
32	Abbey's Home	15554 Rockwell Avenue	6
33	Brentwood Elder Care II	6952 Caswell Lane	6
34	Comfort Home 2	7092 Providence Way	6
35	Comfort Home RCFE	7101 Verdugo Place	6
36	Green Merrylands	15986 Beltray Way	6
37	House of Job LLC	5427 Massa Way	6
38	Julinda's Home Care	13945 Ivy Avenue	6
39	Kate's Home Program	7685 Tangelo Avenue	6
40	La Puente Lavender	9545 Tamarind Avenue	6
41	La Puente Lavender II	16510 Gala Avenue	6
42	Lotus Villa and Memory Care	9448 Citrus Avenue	99
43	Mountain View Residential Care	9073 Olive Street	24
44	Rainbow Guest Home	11205 Daylilly Street	6
45	Rodella Home Care	17446 Madrone Street	6
46	Sandalwood Manor	7602 Purple Sage Circle	4
47	Wilson's Board & Care	8004 Tamarind Avenue	6
<b>TOTAL</b>			<b>486</b>

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

*Emergency Shelters/Transitional Housing*

State law requires cities to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of emergency shelters and transitional housing. To that end, State Law (SB2) requires jurisdictions to designate a zone and permitting process to facilitate the siting of such uses. If a conditional use permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities.

The City’s latest Housing Element identified 2015 Impediment No. 1: Transitional And Supportive Housing. The City has since resolved the Impediment.

The City's adoption of the new Zoning Ordinance in 2019 provided for siting of Emergency Shelters by right in the following zones: Community Commercial (C-1), General Commercial (C-2), and Regional Mixed Use (RMU). (Zoning Code Chapter 30, Article VI, Division 3, Section No. 30-489).

In the prior Housing Element, the City considered establishing an Emergency Shelter Overlay District to permit emergency shelters without discretionary approval. The City identified three areas in the Light Industrial (M-1) Zone for this purpose. These areas contained a total

of 1,199 acres of land with individual parcels typically in the range of 2 1/2 acres in size. Three specific sites totaling 32.1 acres were identified for either redevelopment or adaptive reuse.

The City accomplished this goal by creating the Emergency Shelter Overlay (ESO) district in 2014 (Ord. No. 1708, Exh. A, § 1, adopted 10-28-14), defining it as "A district that provides for seamless incorporation of Emergency, Supportive, and Transitional Housing opportunities on specific properties within the Light Industrial (M-1) zoning district to house individuals at risk of homelessness with such needs for no more than a six- month period, as required by Government Code Section 65583(a)(4) and 65583(a)(5)."

The intent of the overlay district is "to provide for supportive and transitional housing uses on specific properties within the Light Industrial (M-1) zoning district. Additionally, the further intent of this overlay district is to allow emergency shelters without a conditional use permit or other discretionary permit in accordance with Government Code Section 65583. Recognizing the need for available and affordable sites for establishment of emergency shelters and other transitional housing types outside of the traditional locations in commercial districts, the Emergency Shelter Overlay District provides areas and districts for the development of new emergency and supportive housing to be integrated with commercial and light industrial uses and existing social services throughout the City. The purpose of the designated boundaries (area of applicability) is to maximize the potential for provision of emergency shelter and support services throughout the City of Fontana." (Chapter 30, Article IX, Division 1, Section No. 30-622 and Division X, Section No. 30-651).

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

This Analysis of Impediments to Fair Housing Choice includes the review of the General Plan and the Zoning Ordinance in order to identify regulations, practices and procedures that may act as barriers to the development, siting and use of housing for individuals with disabilities. The data were analyzed to distinguish between regulatory and practice impediments described by the jurisdiction. **Table IV-5** summarizes the results of this study.

**Table IV-5  
Fair Housing Impediment Study**

Type of Impediment “Practice” or “Regulatory”	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Definition of “Family”	Family is defined as “one or more individuals occupying a dwelling unit and living in a single household unit.”	City definition of “Family” is consistent with definition set forth in State Codes.
Regulatory	Yes	Definition of “Disability”	No definition of “Disability is contained in the Zone Code.	City uses “Disability” definitions as set forth in State Codes.
Practice	Yes	Personal Characteristics of residents considered?	City does not regulate or consider residents personal characteristics.	City encourages and permits ADA housing improvements
Practice	Yes	Mischaracterize ADA housing as “Boarding, Rooming House or Hotel”?	City provides that a boarding houses shall mean a residence or dwelling, other than a hotel, wherein three or more rooms, with or without individual or group cooking facilities, are rented to individuals under separate rental agreements or leases, either written or oral, whether or not an owner, agent or rental manager is in residence. ADA housing is not differentiated or mischaracterized. Group housing is provided for as mandated by State law.	City complies with State law regarding housing opportunities. City does not restrict housing opportunities for individuals with disabilities.
Practice	Yes	On-site supporting services permitted	City does not restrict on-site ADA supporting services.	City complies with State law regarding ADA accommodations and services.
Regulatory	Yes	Restrict number of unrelated persons residing together if they are disabled	City complies with State law regarding number of unrelated persons residing on-site regardless of disabilities.	City does not distinguish between able or disable when addressing the number of unrelated persons residing on-site as a family unit.

## Analysis of Public Policy Impediments

Type of Impediment "Practice" or "Regulatory"	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Allow ADA Modifications in municipal-supplied or managed housing	City contracts with the County of San Bernardino Housing Authority to operate a Section 8 program within the City. The County HA encourages ADA access to all managed units.	The County Housing Authority complies with State law. City encourages ADA access and supports ADA modifications.
Regulatory	Yes	Variances & Exceptions to zoning and land-use rules.	City requires a public hearing for all zoning variance as required by State law.	City complies with State law regarding the granting of variances and exceptions to zoning and land-use regulations.
Regulatory	Yes	Residential Mixed Land Use Standards	City provides for commercial/residential mixed land use in the Regional Mixed Use (RMU), Boulevard Overlay and Activity Center Overlay districts.	The RMU zone includes permitted uses such as commercial; and residential uses of various densities and unit configuration. Max density 24-DU/ac. The Boulevard and Activity Center Overlay zones permit residential densities up to 24 DU/ac upon the issuance of a CUP.
Regulatory	Yes	Zoning Exclusion regarding Discrimination	City does not exclude or discriminate on housing types based on race, color sex, religion, age, disability, marital or family status, creed or national origin.	All City zoning and land use regulations and policies comply with Federal and State law regarding the prohibition of discrimination.
Regulatory	Yes	Senior Housing Restrictions & Federal Law	City permits multi-family senior housing in the C-1 and C-2 zones only. Density is established by the Planning Commission	Developers often request variances regarding the reduction of unit size and the number of required off-street parking spaces.
Regulatory	Yes	Zoning for ADA accessibility	All zoning districts allow for ADA accessibility and the City's Building Code provides for ADA access.	City's zone code defers to the adopted Uniform Building Code regarding ADA access to dwelling units.

## Analysis of Public Policy Impediments

Type of Impediment “Practice” or “Regulatory”	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Occupancy Standards and Limits	City zone code does not limit occupancy. The State Building and Housing Codes establish criteria to define overcrowding.	City codes comply with State law regarding occupancy standards and limits.
Regulatory	Yes	Zoning for Fair Housing	City’s Housing Element promotes Fair Housing; the Zone Code does not conflict with that policy.	City’s General Plan Housing Element promotes and requires compliance with all Fair Housing laws and policies.
Regulatory	Yes	Handicap Parking for Multi-Family Development	City’s Building Code requires 1 handicap parking space for each 40 required parking spaces.	City codes comply with State and Federal requirements.
Regulatory	Yes	Is a CUP required for Senior Housing?	City does not distinguish between senior citizen housing and other single-family or multi-family housing developments. A CUP is not required for senior housing that is to be located in the multi-family residential zones.	Developers often request modification of housing standards for senior citizen housing such as smaller dwelling sizes and reduced off-street parking.
Regulatory	Yes	Does City distinguish between handicapped housing and other types of single-family or multi-family housing?	City does not distinguish between housing for the Handicapped and other types of single-family or multi-family housing.	City complies with State and Federal law regarding ADA designed housing.
Regulatory	Yes	How are “Special Group Housing” defined in the zone code?	City does not have a “Special Group Housing” definition in the zone code. City uses definitions of “Special Group Housing” as set forth in State law.	City complies with State and Federal law regarding “Special Group Housing”.

Type of Impediment "Practice" or "Regulatory"	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Does the City's Building and planning codes make specific reference to accessibility requirements as set forth in the 1988 Fair Housing Act?	City adopted California State Building & Housing Codes.	Building Department reviews all plans for compliance with the adopted Uniform Building Codes. Monitoring for ADA accessibility is the responsibility of the Building Department.

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

Based on the fair housing impediment study conducted of the General Plan and Zoning Ordinance, the following impediment to fair housing choice is identified:

- 2015-2020 Impediment No. 1: Transitional and Supportive Housing

This impediment is included in the Fair Housing Plan found in **Chapter VI**. The Fair Housing Plan includes recommendations and timeframes to address these impediments.

**B. Development Policy**

*Development Standards*

The Zoning Ordinance provides policy guidance for where housing can be located. The Zoning Ordinance establishes minimum residential development standards to ensure the construction of quality housing, to preserve and protect neighborhoods, and to further broader City goals. **Table IV-6** provides information on single-family residential development standards in the City of Fontana.

**Table IV-6  
Residential Development Standards**

Standard	Zoning Districts								
	R-E	R-1	R-2(a)	R-2(b)	R-3	R-4	R-5	R-PC(a)	R-PC(b)
Density (units/acre)	2.0	5.0	7.6 de-tached	12 attached	12-24	24.1-39	39.1-50	3.0	3 - 6.4
Minimum Lot Size (sf.)	21,780	6,000 w/ average of 7,200	5,000 w/ average of 5,445	5 acres	5 acres	2 acres	2 acres	10,000	*
Maximum Lot Coverage	45%	45%	50%	50%	50%	70%	70%	45%	*
Maximum Height (feet)	35	35	35	55 (multi-family)	55 (multi-family)	55 ft	55 ft	35	35
Front/Rear Yard (ft.)	30/30	25/20	25/20	N/A N/A	25/20	5/-	5/-	25/20	*
Parking Space Requirement	2-Car garage plus 1 garage space for every 2 bedrooms over 3 bedrooms.				Studio/1 Bed: 1.5 spcs. 2 Bed: 2 spcs. (1 gar., 1 covered) 3 or more Bed: 2.5 spcs./unit (1 garage, 1 covered)	1.25-1.50 spcs for units < 550 sq ft; 1.75-2.0 spcs for units > 550 sq ft**	1.25-1.50 spcs for units < 550 sq ft; 1.75-2.0 spcs for units > 550 sq ft**	Studio/1 Bed: 1.5 spcs. 2 Bed: 2 spcs. (1 gar., 1 covered) 3 or more Bed: 2.5 spcs./unit (1 garage, 1 covered)	Studio/1 Bed: 1.5 spcs. 2 Bed: 2 spcs. (1 gar., 1 covered) 3 or more Bed: 2.5 spcs./unit (1 garage, 1 covered)

Source: Fontana Zoning and Development Code, 2020.

Note: R-2(a) applies to projects of less than 145 adj. gross acres and/or projects of more than 145 adj. gross acres without an approved specific plan. R-2(b) applies to projects of 145 or more adj. gross acres that comply with alternative standards under a specific plan.

\*Specified in approved Specific Plan.

\*\*For multi-family components of Mixed Use development projects within 1/2 mi of transit, the requirements are 1.0- 1.25 spaces for units < 550 sq ft; 1.50-1.75 spaces for units > 550 sq. ft.

*Local Government Fees*

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

fees depend on the location, project complexity, and cost of mitigating environmental impacts. **Table IV-7** includes planning discretionary fees and **Table IV-8** provides an approximation of the planning and processing fees associated with the development of a 2,000 square foot three-bedroom, two-bathroom, two car garage dwelling on a 7,000 square foot lot.

**Table IV-7  
Discretionary Fees**

Description	Fee
Conditional Use Permit - SFR	\$2,825
Conditional Use Permit or Modification	50% of CUP
Variance - SFR	\$3,275
Tentative Tract Map	\$7,475 + \$30/Lot
Tentative Parcel Map	\$6,535 + \$100/acre
Lot Line Adjustment	\$2,200
Zone Change	\$6,075
General Plan Amendment	\$6,600 - \$8,725
Negative Declaration	\$2,280.75
Environmental Impact Report (EIR) – Consultant	\$5,000 Deposit + Cost + Citywide G & A
Project Applicant Appeal	65% of Original Filing Fee with \$485 maximum
Certificate of Compliance	\$500

Source: City of Fontana, 2019.

[City of Fontana Comprehensive Fee Schedule 2019](#)

**Table IV-8  
Planning and Processing Fees**

Description	Fee
Building Permit	\$4,290 + 3% of construction cost estimate over \$100K <sup>1</sup>
Improvement Plan Check	\$2,590 + 3.75% of construction cost estimate over \$50K <sup>2</sup>
Grading Permit	\$55 + \$41 Issuance Fee
Water/Sewer Permit	\$72 <sup>3</sup> + \$41 <sup>4</sup> + \$27 + \$83 <sup>5</sup> + \$110 <sup>6</sup> + \$25 <sup>7</sup> + \$876.61 <sup>8</sup> + \$1,700 <sup>9</sup>
Grading Permit and Inspection	\$201 Grading Plan check, first 10,000 sq. ft.

Source: City of Fontana, 2019. [City of Fontana Comprehensive Fee Schedule 2019](#)

1. Fee depends on project valuation: At \$50/sq. ft., a 2,000 sq. ft. home would cost \$100,000; at

- \$100/sq. ft., the cost would rise to \$200,000; ID#190.
- 2. Fee depends of project valuation; ID# 176.
- 3. Residential Plumbing Permit @ \$9/250 sq. ft. X 8, ID# 1306.
- 4. Plumbing Permit Issuance fee, ID# 1281.
- 5. Plumbing Permits, Sewers, ID# 1286, 1287.
- 6. Plumbing Permit, Water Heater, ID# 1291.
- 7. Sewer Connection Permit, ID# 213.
- 8. Sewer Connection Master, ID# 215.
- 9. Stormwater Plan Check, ID# 1925.

**Table IV-9** compares the minimum fees charged by Fontana with those of Rialto, Rancho Cucamonga, and Jurupa Valley. As indicated in the table, the fees charged by the City are reasonable to those of the neighboring communities surveyed. Given the modest level of City fees, they are not deemed to be a constraint to the production of housing in Fontana.

**Table IV-9  
Comparison of City Permit Fees**

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

Source: Cities of Fontana, Rialto, Rancho Cucamonga, and Jurupa Valley, 2019.

[City of Fontana Planning Cases & Application Fees 2019](#)  
[City of Rialto Fee Schedule 2018](#)

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

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

### *Impact Fees*

State law allows local governments to charge fees necessary to recover the reasonable cost of providing services. State law also allows local governments to charge impact fees provided the fee and the amount have a reasonable nexus to the burden imposed on local governments. Among the development impact fees for single family dwelling units (sfdu's) charged by the City of Fontana are Flood Control Fees of either \$4,405 or \$9,790, depending upon location within the City, and Storm Drainage fees that range from \$4,998 for the I-10 South area to \$27,684 for the Decler South area. These fees are charged in addition to Circulation Mitigation fees (\$5,734/sfdu), Fire Assessment fees (\$164/sfdu), General Government (Public Facilities) fees (\$796.26/sfdu), Landscape Improvement fees (\$573.20/sfdu), Library Cap Improvements (\$53330/sfdu), Park Development (\$6,500/sfdu), Police Cap Facilities fees (\$526.52/sfdu), Affordable Housing fees (\$658/sfdu), and Sewer Capital fees (\$876.61/sfdu). These fees total \$16,361.89 without Flood Control or Storm Drainage fees, which vary by flood control district and by specific location, adding at least another \$9,400. (City of Fontana Annual Report, Development Impact Fees, Fiscal Year Ended June 30, 2019) While the fees in Fontana constitute a high percentage of housing sales prices, the fees are necessary to provide an adequate level of services and mitigate the impacts of housing development. To facilitate affordable housing development and to offset the impact of these fees on development costs, the City has the ability to “gap-finance” projects with various sources.

### *Building Codes*

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

In November 2010, the City of Fontana adopted Ordinance 1857, which adopted the 2010 Edition of the California Building, Plumbing, Mechanical, Existing Building, California Historical Building, and Electrical Codes. California cities are required to adopt the California Building Standards Code (Title 24 of the California Code of Regulations). The Code is a set of uniform health and safety codes covering building, electrical, mechanical, plumbing, fire safety, and other issues. Uniform codes are considered the minimum acceptable standards for health and safety. The California Building Standards Commission updates these codes every three years based on updates to uniform codes adopted by professional associations (such as the ICBO).

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

### *Accessibility Standards*

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

- The public and common use portions of such units are readily accessible to and usable by disabled persons;
- The doors allowing passage into and within such units can accommodate wheelchairs; and
- All units contain adaptive design features.<sup>4</sup>

The U.S. Department of Housing and Urban Development (HUD) also recommends, but does not require, that the design, construction and alteration of housing units incorporate, wherever practical, the concept of visibility. This recommendation is in addition to requirements of Section 504 and the Fair Housing Act. Recommended construction practices include wide enough openings for bathrooms and interior doorways and at least one accessible means of egress/ingress for each unit.<sup>5</sup>

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

### *Reasonable Accommodation*

Because a significant portion of the Fontana housing stock was built well before the advent of modern accessibility standards, there are times when residents need to modify their home to allow access by a person with a disability. The City encourages property owners to install features that accommodate people with disabilities (e.g., ramp to the front door).

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<sup>4</sup>Section 804(f)(3)(C) of the Fair Housing Act

<sup>5</sup> HUD Directive, Number 00-09.

Such requests are approved upon payment of building permit and plan check fees, as applicable. Depending on the modifications to be made, the City also may require the applicant to apply for a zoning variance.

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

As indicated earlier in this chapter, the City will be amending its Development Code to provide a reasonable accommodation procedure.

### *Permit Processing*

Development permit procedures are designed to ensure that residential development proceeds in an orderly manner so as to ensure the public's health, safety, comfort, convenience, and general welfare. Although permit processing procedures are a necessary step, unduly burdensome procedures can subject developers to considerable uncertainty, lengthy delays, and public hearings that cumulatively make a project financially infeasible.

State law requires communities work toward improving the efficiency of building permit and review processes by providing one-stop processing, thereby eliminating the necessary duplication of effort. The Permit Streamlining Act helped reduced governmental delays by limiting processing time in most cases to one year and requiring agencies to specify the information needed to complete an acceptable application.

The City development approval process is designed to accommodate, not hinder, development. The City of Fontana is committed to processing a project application within 30 days of submittal to deem a project application complete or incomplete. Once a project is deemed complete, it is scheduled for the City's internal Development Advisory Board (DAB). The DAB consists of Fire, Police, Public Works, Engineering, Building & Safety, Hazardous Waste, Landscape, and other staff as necessary. The DAB reviews projects and recommends appropriate conditions of approval. Subsequent to DAB approval, a Planning Commission hearing is then scheduled at which the project is reviewed, and either approved or denied. If the project is approved, an approval letter, including the conditions of approval, is sent to the applicant. The project only proceeds to the City Council if it requires a legislative act such as a General Plan Amendment or Zone Change.

The project approval process is identical for single-family and multiple-family residential projects. If a housing project does not require a discretionary approval (four or fewer

dwelling units requires plan check approval only), the average time for processing a plan check is 4-8 weeks. If the project requires a discretionary approval as previously described, the process, due to noticing requirements, project revisions, and the generation of staff reports, typically takes eight to twelve weeks. If the project requires a legislative act by the City Council such as a General Plan Amendment or Zone Change in conjunction with the discretionary project, an additional five to six weeks is typically required to allow for preparation for and scheduling of the public hearing.

To mitigate the entitlement costs involved with developing affordable housing, the City allows priority development review processing for low and moderate income housing applications, as well as housing for the elderly. Expedited review processing can be concluded in 4-6 weeks. Processing times vary with the complexity of the project. Single-family homes and other minor tenant improvements can typically be processed with a 3-4 week turnaround time. Other projects requiring Conditional Use Permits, Zoning Amendments, or other discretionary actions necessitate a higher level of review, resulting in a longer processing timeline. As supported by reasonable processing times, and the relative facility of permit procedure, the City is processing and permit procedures are not felt to constrain the development of housing.

### *Assessment*

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

State law prohibits a local agency from disapproving a low-income housing development, or imposing conditions that make the development infeasible, unless one of six conditions exists. Three conditions are of most importance: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.<sup>6</sup>

### *Community Representation*

The City values citizen input on how well city government serves its residents. The City

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<sup>6</sup> Government Code Section 65589.5

Council relies on its Planning Commission, advisory commissions, and boards to provide advice and recommendations in areas of City services. Fontana makes an effort to ensure that advisory boards and commissions reflect the diversity of the City's residents. Boards, commissions, and advisory committees that have responsibility for land use, building, and other policies that could affect fair housing choice include:

- Planning Commission; and
- Parks and Recreation Commission.

For further information, Chapter II, Article VIII of the Fontana Municipal Code describes each commission, its scope and authority, election or appointment regulations, and functions.

### *Public Housing Authority (PHA) Tenant Selection Procedures*

An examination of the City of Fontana Housing Authority and the San Bernardino County Housing Authority tenant selection procedures did not reveal any impediments to fair housing choice. Based on information provided by the Housing Authority, no complaints were received from prospective tenants alleging discrimination or unfair practices in the Housing Authority's selection of tenants to occupy public housing projects.

### *Residential Anti-Displacement Policy*

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

## **C. Housing—Employment—Transportation Linkage**

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

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

### *Housing Programs*

The 2014-21 Housing Element sets forth various housing goals for the community, accompanied by many implementing policies and programs. The Housing Element has identified five (5) main issue categories including:

- Conserve and improve the condition of the existing standard affordable housing stock;
- Assist in the development of adequate housing to meet the needs of Extremely Low-, Very Low-, Low-and Moderate-Income households;
- Identify adequate housing sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income groups;
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement and development of housing;
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin or color.

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

#### *Rental Assistance*

The San Bernardino County Housing Authority is a federally funded agency that administers housing assistance programs for qualified very low-income families, disabled people, and seniors. Section 8, a rent subsidy program, offers very low-income households the opportunity to obtain affordable, privately-owned rental housing on the open rental market. Section 8 tenants pay a minimum of 30% of their income for rent and the Housing Authority pays the difference to the negotiated payment standard established by HUD.

#### *Homeownership Assistance*

While financial lending institutions offer homeownership programs, the City cooperates with other organizations to increase homeownership options. Households seeking to purchase a home in Fontana can apply for home purchase assistance through the City's CDBG First-Time Homebuyer Assistance Program. This program provides qualified families with down payment assistance necessary to secure financing toward the purchase of an existing home.

#### *Housing Rehabilitation Programs*

Housing rehabilitation is an important means to improve the individual properties as well as maintain the quality of life in our neighborhoods. The City’s Department of Housing and Business Development / Housing Authority implements the Emergency Grant Program to provide housing rehabilitation to those low- and moderate-income households in need of rehabilitation services. The City also operates an aggressive code enforcement program to ensure the health and safety of all residents.

The City also has a CDBG Emergency Repair Grant program that offers grants of up to \$3,500 to low- and moderate- income homeowners to make health and safety repairs to their homes.

**Table IV-10** shows the City’s four housing strategy areas:

**Table IV-10  
Housing Programs Included in the 2014-21 Housing Element**

Housing Strategy	Objective
Strategy 1.0 - The City of Fontana will establish policy actions for the future production of a range of rental and for-sale housing units in the City.	
1.1: Provision of adequate sites to meet regional housing needs assessment (RHNA) goals.	<ul style="list-style-type: none"> <li>• Establish new R-5 and R-4 zoning districts</li> </ul>
1.2: Expansion of Affordable Housing Opportunities through new construction.	<ul style="list-style-type: none"> <li>• Expand affordable housing opportunities through new construction by means of financial assistance and/or other means.</li> </ul>
1.3: Annual monitoring of housing production.	<ul style="list-style-type: none"> <li>• Conduct annual monitoring of Housing Element to identify new residential development permits; identify units built in low income categories; etc.</li> </ul>
1.4: Compliance with State Density Bonus law.	<ul style="list-style-type: none"> <li>• Continue to comply with State Density Bonus Law. The City will seek five new second dwelling units on an annual basis, based on applicant choice.</li> </ul>
1.5: Optional density standard review.	<ul style="list-style-type: none"> <li>• Review and revised optional density standards as appropriate.</li> </ul>
1.6: Inclusionary housing ordinance.	<ul style="list-style-type: none"> <li>• Continue inclusionary housing ordinance implementation. In 2012, the City adopted the inclusionary housing ordinance, which requires new residential and non-residential construction to pay fees that are designated for affordable housing.</li> </ul>
1.7: Manufactured and modular housing.	<ul style="list-style-type: none"> <li>• To educate the public and developers on the advantages of manufactured and modular housing and to encourage its inclusion in the infill housing program.</li> </ul>

Housing Strategy	Objective
1.8: Developers proposed projects.	<ul style="list-style-type: none"> <li>Facilitate developer proposed projects, which includes acquisition, rehabilitation, and management of large scale multi-family projects.</li> </ul>
1.9: Infill housing program.	<ul style="list-style-type: none"> <li>Maintain residential properties resource guide and infill housing program. Seek to encourage two infill housing units on an annual basis.</li> </ul>
1.10: Monitor development fees.	<ul style="list-style-type: none"> <li>Monitor existing development fees to ensure in-lieu fees, development impact fees, and processing fees are not considered an undue constraint on residential development.</li> </ul>
1.11: Encourage the development of family housing.	<ul style="list-style-type: none"> <li>Encourage family housing. Seek to encourage the development of five family units per year, based on developers’ interests.</li> </ul>
1.12: Encourage the development of senior housing.	<ul style="list-style-type: none"> <li>Encourage senior housing. Seek to encourage the development of 10 senior housing units per year, based on developers’ interests.</li> </ul>
1.13: Provision of a variety of residential housing opportunities throughout the City.	<ul style="list-style-type: none"> <li>Provide residential housing opportunities throughout the City.</li> </ul>
1.14: Expedited permit processing	<ul style="list-style-type: none"> <li>Assign eligibility for expedited permit processing to developments that incorporate multi-family units for large families.</li> </ul>
1.15: Review parking requirements	<ul style="list-style-type: none"> <li>Review the requirements and revise parking requirements as appropriate.</li> </ul>
<p>Strategy 2.0 – The City of Fontana will establish policy actions to conserve the existing housing stock and preserve housing opportunities for Fontana’s residents.</p>	
2.1: Monitoring of “at-risk” housing units.	<ul style="list-style-type: none"> <li>Monitor the 418 units that are at risk of converting from affordable, deed-restricted units to market-rate units over the next 10 years.</li> </ul>
2.2: Proactive rental enforcement program.	<ul style="list-style-type: none"> <li>Utilize CDBG funds for code enforcement activities, with special attention placed on properties within the City’s low and moderate income neighborhoods.</li> </ul>
2.3: Acquisition of rehabilitation of existing multi-family housing units.	<ul style="list-style-type: none"> <li>Provide for financing, regulatory incentives and other in-kind technical assistance to non-profits, affordable housing developers and property owners for acquisition and rehabilitation of multi-family properties for affordable housing.</li> </ul>
2.4: Multi-family revitalization program.	<ul style="list-style-type: none"> <li>Address the negative impacts created within the community by substandard buildings and serve as a vehicle for reducing code enforcement activity and police department calls for service.</li> </ul>

Housing Strategy	Objective
Strategy 3.0 – The City of Fontana will establish policy actions for providing high-quality, environmentally responsible, well-designed living environments for Fontana’s residents.	
3.1: Water conservation practices.	<ul style="list-style-type: none"> <li>Promote the inclusion of state-of-the-art water conservation practices in existing and new residential projects where proven to be safe and environmentally sound.</li> </ul>
3.2: Promotion of green/sustainable development practices.	<ul style="list-style-type: none"> <li>To further promote efficient use of resources, evaluate the potential for offering incentives such as priority processing, or other strategies to further encourage resource conservation.</li> </ul>
Strategy 4.0 – The City of Fontana will establish policy actions to enhance opportunities for affordable housing for all segments of Fontana’s population.	
4.1: Adopt reasonable accommodation procedures.	<ul style="list-style-type: none"> <li>Analyze existing land use controls, building codes, and permit and processing procedures to determine constraints they impose on the development, maintenance, and improvement of housing for persons with disabilities.</li> </ul>
4.2: Compliance with Senate Bill 2.	<ul style="list-style-type: none"> <li>Consider amending the Light Industrial (M-1) zoning district to permit emergency shelters without discretionary approval; Ensure the provisions of the Housing Accountability Act are enforced and remove the potential for denial of emergency shelter/transitional housing facility via discretionary approvals if such housing is otherwise consistent with adopted regulatory standards; etc.</li> </ul>
4.3: Encourage the development of housing units for a variety of income levels	<ul style="list-style-type: none"> <li>Encourage development of 20 units within mixed income developments per year.</li> </ul>
4.4: Affordable housing resource base.	<ul style="list-style-type: none"> <li>Develop an online affordable housing resource base with the intent of providing dissemination of information regarding funding/financing options available at the Federal, State, and local level, incentives, partnership opportunities and other resources that promote a well-informed citizenry.</li> </ul>
4.5: Participation and support of regional fair housing efforts.	<ul style="list-style-type: none"> <li>Continue to provide fair housing information through print and electronic media that may include the City’s website, brochures and newsletters.</li> </ul>
4.6: Family self-sufficiency program.	<ul style="list-style-type: none"> <li>Continue to refer inquiries and coordinate with the County Housing Authority for Section 8 participants.</li> </ul>

<b>Housing Strategy</b>	<b>Objective</b>
4.7: Mentally ill services program.	<ul style="list-style-type: none"> <li>Continue to refer inquiries and coordinate with the County Housing Authority. The Homeless/Mentally Ill Program provides the basic needs of food, clothing, and shelter to mentally ill homeless adults in San Bernardino County.</li> </ul>
4.8: Transitional housing facilitation.	<ul style="list-style-type: none"> <li>Rehabilitation of one housing unit and assistance to up to 200 persons with transitional housing annually.</li> </ul>
4.9: Domestic violence services program.	<ul style="list-style-type: none"> <li>Assist 20 homeless victims of violence each year.</li> </ul>
4.10: Community Assistance Program (CAPS)	<ul style="list-style-type: none"> <li>Continue to refer inquiries and coordinate with the County Housing Authority with this program. This program offers assistance in getting cleaned-up physically and free from dependencies, job training, etc.</li> </ul>
4.11: Anti-poverty program	<ul style="list-style-type: none"> <li>Continue to support the Housing Authority in this program by providing funding, as available, and coordination of programs. This program provides short-term emergency assistance and services to low-income families including temporary shelter, etc.</li> </ul>
4.12: Housing referral and information services.	<ul style="list-style-type: none"> <li>Continue to refer inquiries and coordinate with the County Housing Authority. The County Housing Authority provides rental subsidies and property improvements to County-owned rental units.</li> </ul>
4.13: Provision of housing opportunities for extremely low-income households.	<ul style="list-style-type: none"> <li>Coordinate with the County and social service agencies to provide supplementary coordination, in-kind services and financial contributions for supportive services and other ancillary needs for the extremely-low income population.</li> </ul>
4.14: Employee housing.	<ul style="list-style-type: none"> <li>Review and amend the zoning code as appropriate to comply with statutory provisions.</li> </ul>
4.15: Housing for persons with development disabilities.	<ul style="list-style-type: none"> <li>Support the ability of persons with development disabilities to live in integrated community settings.</li> </ul>

*Public Services and Facilities*

A variety of public services and facilities are available to Fontana residents. The key facilities and services are identified in **Table IV-11**.

**Table IV-11  
Public Services and Facilities**

<b>Public Facility</b>	<b>Location</b>
Fontana City Hall	8353 Sierra Avenue
Community Services Department	16860 Valencia Avenue
Fontana Metrolink Plaza	16777 Orange Way
Kaiser High Public Library	11155 Almond Avenue
Lewis Library & Technology Center	8437 Sierra Avenue
Summit Library	15551 Summit Avenue
Almeria Park	7250 Almeria Avenue
Art Depot Gallery	16822 Spring Street
Bill Martin Park	7792 Juniper Avenue
Cambria Park/Walnut Village	17160 Cambria Avenue
Catawba Park	11411 Catawba Pl.
Center Stage Theater	8463 Sierra Avenue
Chaparral Park	11415 Rancherias Dr.
Condor Park	4602 Condor Ave.
Coyote Canyon Park	5065 Coyote Canyon Rd.
Fernandez Park	18006 Miller Avenue
Cypress Center & Josephine Knopf	8380 Cypress Avenue
Don Day Neighborhood Center	14501 Live Oak Avenue
Fiesta Park	17127 La Vesu Road
Fontana Community Senior Center	16710 Ceres Avenue
Fontana Park	15556 Summit Avenue
Fontana Park Aquatics Center	15610 Summit Avenue
Fontana Skate Park - North Park	5553 Lytle Creek Road
Heritage Circle Park	14332 Caryn Circle
Heritage Neighborhood Center	7350 W Liberty Parkway
Heritage Playground E	14190 W. Constitution Way
Heritage Playground W	13640 W. Constitution Way
Hunter's Ridge Park	5072 Cherry Avenue

<b>Public Facility</b>	<b>Location</b>
Jack Bulik Neighborhood Center	16581 Filbert Street
Jack Bulik Skate Park - South Park	16581 Filbert Street
Jessie Turner Health & Fitness Center	15556 Summit Avenue
Koehler Park/The Landings	15352 Walnut Avenue
Koehler Gallery	8536 Sierra Avenue
Lewis Library & Technology Center	8437 Sierra Avenue
Martin Tudor Jurupa Hills Park	11925 Sierra Avenue
Martin Tudor Splash Park	11660 Sierra Avenue
Mary Vagle Nature Center	11501 Cypress Avenue E.
McDermott Sports Complex & Park West	7846 S. Heritage Loop
Patricia Marrujo Park	5730 Avenal Place
Miller Fitness Center	17004 Arrow Boulevard
Miller Park	17004 Arrow Boulevard
North Heritage Park	1736 N. Heritage Circle
North Tamarind Park	8025 Tamarind Avenue
Northgate Park	7850 Celeste Avenue
Oak Park	14224 Live Oak Avenue
Patricia Murray Park	8040 Jamestown Cir
Ralph M. Lewis Sports Complex	6198 Citrus Avenue
Rosena Park East	15299 Curtis Avenue
Rosena Park West	15057 Grays Peak
San Sevaine Park	5355 Cherry Ave
Santa Fe Park & Metrolink Station	16807 Orange Way
Seville Park & Amphitheater	16669 Seville Avenue
Shadow Park	14250 Shadow Avenue
Sierra Crest Park	4860 Condor Avenue
Southridge Park	14501 Live Oak Avenue
Steelworkers' Auditorium	8437 Sierra Avenue
Sycamore Hills Park	11075 Mayberry Street
Veterans Park	17255 Merrill Avenue
Veterans Park West	9055 Mango Avenue
Veterans Resource Center	16799 Spring Street
Village Park	15601 Village Drive East

Source: City of Fontana website, 2019.

*Employment in Fontana*

A variety of career opportunities are available in Fontana with large employers, such as those shown in **Table IV-12**.

**Table IV-12  
Principal Employers**

Employer	Number of Employees	Percentage of Total City Employment	Type of Business
Kaiser Hospital & Medical Group	5,574	5.59%	Medical
Fontana Unified School District	4,928	4.94%	Education
City of Fontana	1,,112	1.12%	Municipal
Black & Decker U S	400	0,40%	Manufacturing
Costco Wholesale #627	389	0.39%	Retail
Estes Express Lines	352	0.35%	Logistics/Shipping
Estes West	351	0.35%	Logistics/Shipping
Reddaway	339	0.34%	Logistics/Shipping
Sierra Aluminum Co.	303	0.30%	Manufacturing/Construction
Saia Motor Freight Line LLC	298	0.30%	Logistics/Shipping
Target (Dayton-Hudson)			
Manheim Southern California			
Better Beverages			
American Security Products			
Creative Manufacturing			
Forged Metal			
<b>Total</b>	<b>14,046</b>	<b>14.09%</b>	

Source: City of Fontana Comprehensive Annual Financial Report, Fiscal Year ending June 30, 2019..

*Housing—Employment—Transportation Linkage*

Public transit helps move people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.

**Local and Regional Services.** Omnitrans operates throughout the urbanized area of

southwestern San Bernardino County and is the primary local transit service provider in Fontana. Omnitrans operates two types of transit services: 27 fixed route services and Access (ADA) services for persons who are physically or cognitively unable to use regular bus service.

Transit routes within Fontana are laid out in a traditional grid-like pattern. Omnitrans bus routes in the City include routes 10, 12, 14, 15, 19, 20, 29, 61, 66, 67, and 82. Each of these routes runs east-west in the City for at least a portion of the route. The main north-south routes are 10, 19 and 82. Routes generally begin between 5:00 and 7:00 a.m. and run until 8:00 or 10:00 p.m. All buses are equipped with lifts to carry wheelchairs and other mobility devices allowing people with a disability to board buses.

**Table IV-13  
Omnitrans Bus Lines in Fontana**

Line	Description
10	San Bernardino - Fontana via Baseline and Citrus
12	Fontana - Rialto - Muscoy - Cal State San Bernardino.
14	Fontana - Foothill - San Bernardino
15	Fontana - Redlands via Rialto and San Bernardino
19	Fontana - Redlands via Colton and Grand Terrace
20	Fontana Metrolink - Kaiser Hospital via Merrill, Hemlock, and Randall
29	Fontana - Bloomington via Cedar and Valley
61	Fontana - Ontario - Pomona
66	Fontana - Montclair via Foothill
67	Montclair - Fontana via Mountain, Baseline, and Sierra (weekdays only)
82	Rancho Cucamonga - Fontana - Sierra Lakes via Jurupa and Sierra Lakes

Source: Omnitrans, 2019.

In compliance with ADA and Title VI of the Civil Rights Act, Omnitrans Access Service is an Americans with Disabilities Act (ADA) mandated public transportation service for people unable to independently use the fixed route bus service in South Western San Bernardino County for all or some of their trips. Access provides curb-to-curb service to complement the Omnitrans fixed-route bus system, and is available during the same periods that fixed-route service operates. (Passengers requiring a higher level of assistance from their origin to destination, due to an impairment related condition, will need to contact Omnitrans to identify a reasonable accommodation that can be provided to assist their transportation.) The Access service area is up to 3/4 mile on either side of an existing bus route. Access riders make reservations for their trips, or arrange a subscription service. Reservations can be made up to 7 days in advance but no less than the day before the scheduled trip.

Reservation hours are daily, including holidays, from 8:00 a.m. to 5:00 p.m.

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

Metrolink is a premier regional rail system, including commuter and other passenger services, which links people to employment and activity centers. Services run Monday through Friday and Saturday for certain routes. Rideshare is approximately 11,000 riders per week for the San Bernardino area. The Red Line through Fontana begins at 4:30 a.m. and ends at 7:30 p.m. Fare costs vary by distance but a one-way fare from Fontana to Los Angeles' Union Station is \$9.00. Multi-day and monthly passes are available at reduced rates.

**Service Standards.** Omnitrans has adopted service standards to ensure a high level of service and equitable distribution of services among the many communities served. Perhaps the most important indicator is route coverage. All areas having a minimum residential density of 3.5 dwelling units per acre or employment density of 10 jobs per acre, as measured over an area of 25 acres, should be provided with a transit service that places 90% of residences and jobs within one-half mile of a bus stop. To provide adequate access to persons with disability, Omnitrans Access service is available within a 3/4 mile radius either side of an existing Omnitrans fixed-route.

Omnitrans and Metrolink maps as of September 2019 indicate that the City of Fontana is well served. **Maps IV-4 and IV-5** show employers and public facilities in relation to public transportation routes. The current Omnitrans fixed routes are reflected on the map, which indicates that the major employers and public facilities within the City of Fontana are all well-served by public transportation lines within 1/2 to 3/4 of a mile from a transit line. Exceptions include employer Reddaway, located one mile from the nearest bus stop at Jurupa and Etiwanda Avenue. There is also a cluster of Public Services located in the portion of the City just north of Summit Avenue (See **Map IV-5**) that are poorly served. Based on this analysis, it appears that major transit lines serve areas in the central core of the City with high concentrations of affordable rental housing developments and assisted housing, within approximately 1/2 to 3/4 of a mile of a fixed route.

However, as mentioned in the 2010 AI, a closer analysis of Fontana's development patterns reveals two (2) underserved areas, as follows:

- Falcon Ridge / Summit Avenue Job Center: Omnitrans does not have a bus route connecting the public transit system to the Falcon Ridge and Summit shopping centers located on either side of Summit Avenue off of the 1-15 freeway in North Fontana. This is a major new employment center that includes shops, restaurants and stores such as Target, Kohls, Staples, Stater Brothers, and the Sports Authority. This shopping center serves emerging residential developments in North Fontana. Fontana and the City of Rialto are experiencing a significant amount of commercial and residential development in this area along the I-15, 210 and 30 Freeways which should increase ridership potential. The closest bus route, Omnitrans Route 82, fails to bring transit users closer than a mile to a mile and a half from the area
- Southwest Industrial / Jurupa Hills Job Centers: Bus route 82 is the southwestern-most as well as the northernmost bus route in the City, running east-west in the south for miles along Jurupa Avenue, and north along Sierra Avenue from Jurupa up to the 210 freeway. An extension of this line or another route along Slover Avenue just south of the 10 freeway would connect residents to two of the top 10 employers in Fontana that are not located within one-half mile of a bus stop. These include Sierra Pacific Aluminum, located 0.8 miles from the bus stop at Mulberry and Marley; and Estes West, located 0.7 miles from the bus stop at Jurupa and Cherry.

Omnitrans' Short-Range Transit Plan (2015-2020) focuses on Omnitrans' core function of connecting people, business and the community with safe, reliable and frequent transportation. Some of their key proposals is to strengthen east-west connections to the sbX Green line in East Valley, and restructure the West Valley routes to build more direct north-south travel to tie into Routes 61 and 66. Another proposal is to create a direct connection between Fontana and Chaffey College through Route 67.

Other proposals fall under the auspices of the service's OmniConnects plan, and include:

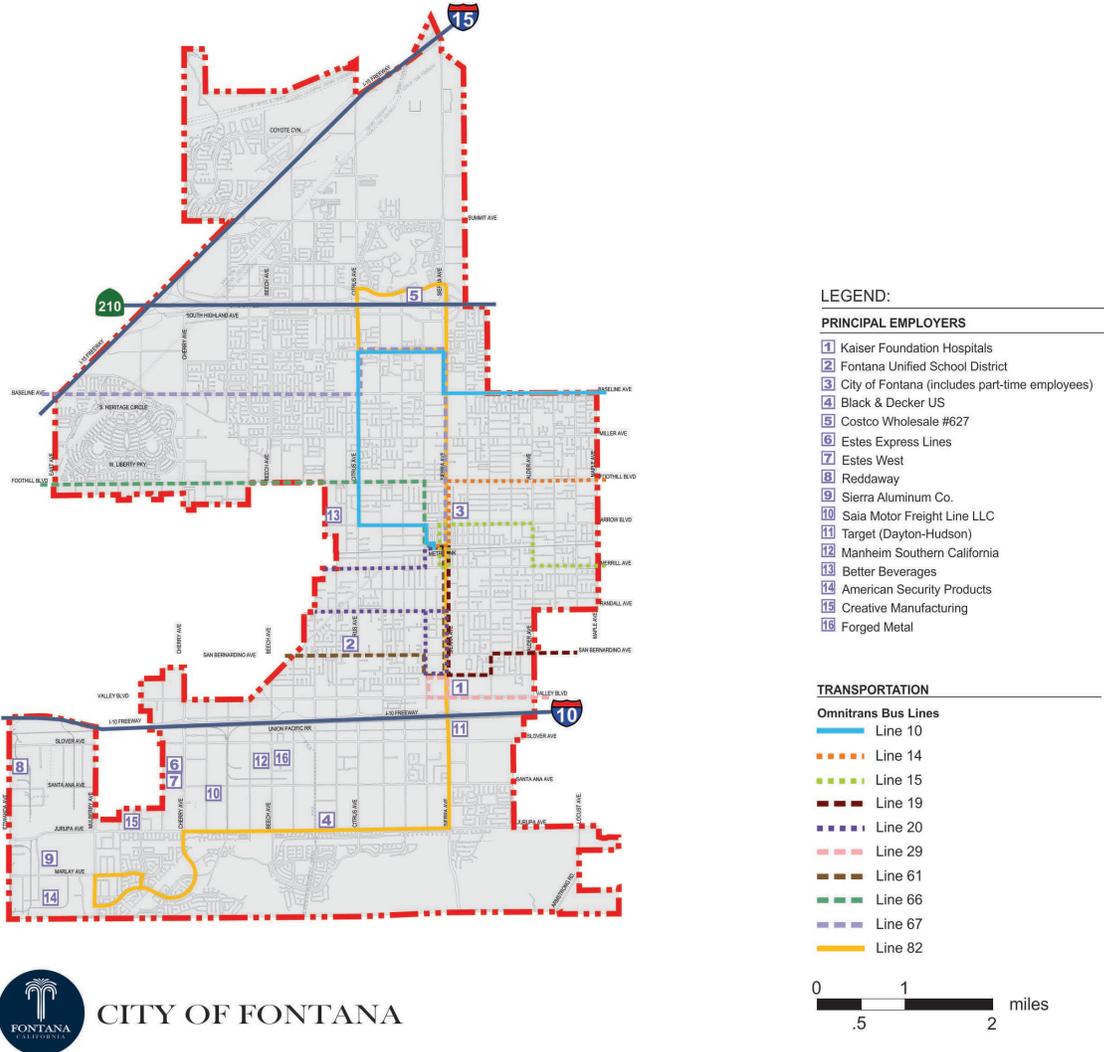
- The West Valley Connector Corridor – a bus rapid transit line through Fontana, Rancho Cucamonga, Ontario, Montclair, and Pomona. The route will reduce end-to-end travel times by 10% by reducing the number of stops to space them 1/2-mile to one mile apart, as well as using transit signal priority to bypass traffic congestion. The project will also include significant improvements to bus stops/stations. A future phase will include 3.5 miles of dedicated transit lanes on Holt Boulevard in the City of Ontario, as well as 60' articulated transit vehicles to operate the route.
- The Foothill Central Corridor – a limited-stop route along Foothill Boulevard/Fifth Street through San Bernardino, Rialto, and Fontana. The route will stop approximately every one mile. In future phases, capital improvements such as transit signal priority and stop/station improvements will be implemented as funding becomes available.
- A network of freeway express services, which will use HOV lanes on freeways where

available to provide express peak commuter service between major downtown areas/employment centers or park-and-rides.

Omnitrans has instituted a number of changes to its service that impact Fontana users.

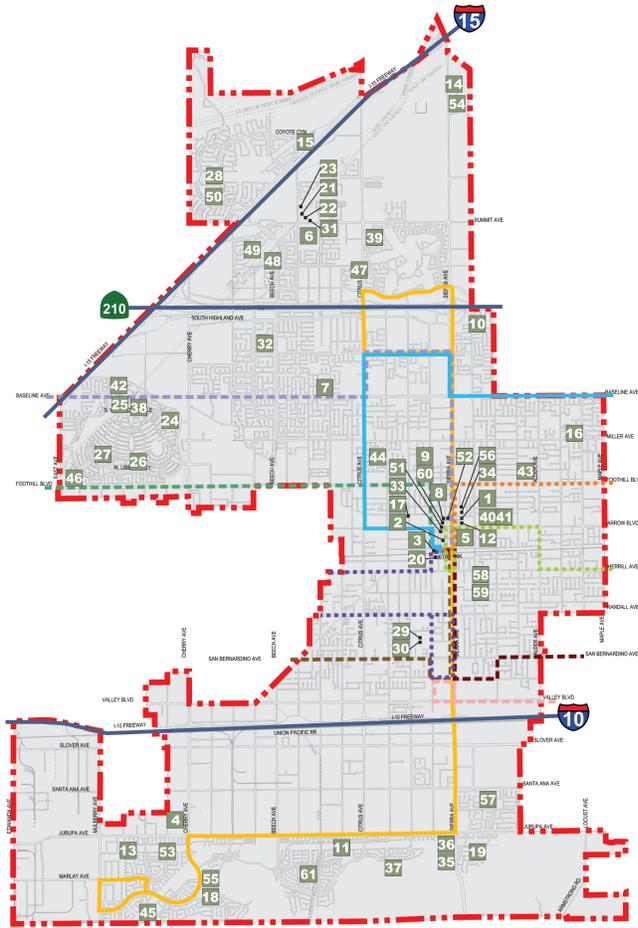
- As of January 6, 2020, route 15 will be modified slightly to travel along Merrill Ave. between Alder and Sierra in Fontana. The San Bernardino County Courthouse will continue to be served by Route 12.
- To connect riders traveling east from Fontana, Route 11 will become the new Route 12, providing direct access from Fontana Metrolink to the CSUSB campus. Route 12 will serve major employment centers along the way, including Amazon warehouses and the Renaissance Marketplace in Rialto, which opened in 2018, creating a multitude of jobs as well as destinations to eat, shop, and play. Note: Route 12 will not connect at the San Bernardino Transit Center.

Map IV-4  
Transit Access and Employers



Source: Omnitrans; City of Fontana Comprehensive Annual Financial Report (CAFR), Fiscal Year ending June 30, 2019.

Map IV-5  
Transit Access to Public Facilities



LEGEND:

**PUBLIC FACILITIES**

- |                                       |  |
|---------------------------------------|--|
| 1 Fontana City Hall                   | 31 Jessie Turner Health & Fitness Center |
| 2 Community Services Department       | 32 Koehler Park/The Landings             |
| 3 Fontana Metrolink Plaza             | 33 Koehler Gallery                       |
| 4 Kaiser High Public Library          | 34 Lewis Library & Technology Center     |
| 5 Lewis Library & Technology Center   | 35 Martin Tudor Jurupa Hills Park        |
| 6 Summit Library                      | 36 Martin Tudor Splash Park              |
| 7 Almeria Park                        | 37 Mary Vagle Nature Center              |
| 8 Art Depot Gallery                   | 38 McDermott Sports Complex & Park West  |
| 9 Bill Martin Park                    | 39 Patricia Marrujo Park                 |
| 10 Cambria Park/Walnut Village        | 40 Miller Fitness Center                 |
| 11 Catawba Park                       | 41 Miller Park                           |
| 12 Center Stage Theater               | 42 North Heritage Park                   |
| 13 Chaparral Park                     | 43 North Tamarind Park                   |
| 14 Condor Park                        | 44 Northgate Park                        |
| 15 Coyote Condor Park                 | 45 Oak Park                              |
| 16 Fernandez Park                     | 46 Patricia Murray Park                  |
| 17 Cypress Center & Josephine Knof    | 47 Ralph M. Lewis Sports Complex         |
| 18 Don Day Neighborhood Center        | 48 Rosena Park East                      |
| 19 Fiesta Park                        | 49 Rosena Park West                      |
| 20 Fontana Community Senior Center    | 50 San Sevaine Park                      |
| 21 Fontana Park                       | 51 Santa Fe Park & Metrolink Station     |
| 22 Fontana Park Aquatics              | 52 Seville Park & Amphitheater           |
| 23 Fontana Skate Park-North Park      | 53 Shadow Park                           |
| 24 Heritage Circle Park               | 54 Sierra Crest Park                     |
| 25 Heritage Neighborhood Center       | 55 Southridge Park                       |
| 26 Heritage Playground E              | 56 Steelworkers's Auditorium             |
| 27 Heritage Playground W              | 57 Sycamore Hills Park                   |
| 28 Hunter's Ridge Park                | 58 Sierra Crest Park                     |
| 29 Jack Bulik Neighborhood Center     | 59 Veterans Park West                    |
| 30 Jack Bulik Skate Park - South Park | 60 Veterans Resource Center              |
|                                       | 61 Village Park                          |

**TRANSPORTATION**

**Omnitrans Bus Lines**

- Line 10
- Line 14
- Line 15
- Line 19
- Line 20
- Line 29
- Line 61
- Line 66
- Line 67
- Line 82



CITY OF FONTANA

Source: Omnitrans, City website 2019.

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

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

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

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

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

#### A. Fair Housing Education

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

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

the duty to affirmatively further fair housing (AFFH), accessibility concerns for persons with disabilities, and how to engage the community in the AFFH planning process.

## B. Fair Housing Enforcement

### *Discrimination Complaint Intake and Investigation*

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

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

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

IFHMB uses government-regulated testing methodologies to enforce, support, and conduct fair housing investigations. A housing discrimination complaint can be investigated through testing, the gathering of witness statements, and through research surveys. Based on the details provided by the complainant, IFHMB will either investigate the complaint or advise the complainant of their other options, which include: conciliation, filing a complaint with the Department of Housing and Urban Development (HUD) or with California’s Department of Fair Employment and Housing (DFEH), hiring a private attorney, or possibly, a referral to such an attorney, or filing a complaint with the Department of Justice (DOJ).

During the period studied, there were 55 discrimination inquiries made to IFHMB by Fontana residents. **Table V-1** shows the basis of IFHMB discrimination complaints.

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

Basis	Number of Inquiries	Number of City Residents Affected
Disability	35	91
National Origin	0	0
Race	9	27
Arbitrary Factor	2	2
Age	1	1
Ancestry	1	5
Familial Status	3	14
Sex	2	8
Marital Status	1	4
Source of Income	1	4
<b>Total:</b>	<b>55</b>	<b>156</b>

Source: Inland Fair Housing and Mediation Board, 2019.

Review of the data shows that disability is, far and away, the most common category for allegations of discrimination. Disability represents 64 percent of all discrimination complaints. Race (16 percent) is the second most common basis for alleged discrimination, with all others falling at below 6 percent each in the City of Fontana.

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

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

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

**Table V-2  
HUD and FHAP Discrimination Complaints, 2017**

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

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

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

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

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

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

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

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

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

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

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

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

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

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

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

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

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

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

*Hate Crimes*

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

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

The HUD and FHAP findings do not appear to be reflected in the City of Fontana by crime reports to the Federal Bureau of Investigation (FBI). The FBI classifies hate crimes into one of five (5) primary bias motivation categories, including: race, religion, sexual orientation, gender, or disability.

**Table V-5** summarizes the hate crime incidents by bias motivation as reported by the FBI<sup>1</sup> for calendar years 2015-2018. It is important to note that not all incidents of coercion, intimidation, threats, interference, or retaliation rise to the level of a hate crime, and even with those incidents that do, not all such incidents are reported to law enforcement.

**Table V-5  
Hate Crime Incidents 2015-2018**

Calendar Year	Race/ Ethnicity/ Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2015	0	0	0	0	0	0	0
2016	0	0	0	0	0	0	0
2017	0	2	1	0	0	0	3
2018	1	0	0	0	0	0	1
<b>Total:</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>

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

<sup>1</sup> FBI Hate Crime Incidents by State and Agency, 2015-2018. <http://www.fbi.gov/ucr/>

**C. Fair Housing Legal Status**

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

Previous chapters of this Analysis of Impediments (AI) examined changes in Fontana during the last five years, analyzed public policies for impediments to fair housing, and documented fair housing opportunity in the City of Fontana. Building upon the previous analysis, this chapter recommends actions to improve housing opportunity in Fontana. **Table VI-1** at the end of this chapter summarizes the unresolved impediments, new impediments and recommendations to address these impediments to fair housing choice with an implementation schedule.

**A. Unresolved Impediments**

HUD requires the City to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior AIs. The following impediments were cited in previous reports:

**2007 Impediment No. 3** involved lending discrimination based on race. Home Mortgage Disclosure Act (HMDA) data from 2008 showed that Hispanic and African-American individuals or families experienced lower loan approval rates than other groups when purchasing or refinancing a home in the City.

Race/Ethnicity	Home Purchase Loan Approval Rate	Refinance Approval Rate
Asian	55%	39%
White	55%	37%
Hispanic	48%	33%
African American	40%	23%
<b>All Groups (Overall)</b>	<b>45%</b>	<b>28%</b>

Source: HMDA Database, 2009.

Race/Ethnicity	Home Purchase Loan Approval Rate	Refinance Approval Rate
Asian	85%	79%
White	90%	76%
Hispanic	86%	76%
African American	82%	70%
<b>All Groups (Overall)</b>	<b>88%</b>	<b>82%</b>

Source: HMDA Database, 2015.

Race/Ethnicity	Home Purchase Loan Approval Rate	Refinance Approval Rate
Asian	74%	44%
White	79%	50%
Hispanic	76%	38%
African American	65%	41%
Decline or N/A	96%	51%
<b>All Groups (Overall)</b>	<b>81%</b>	<b>43%</b>

Source: HMDA Database, 2017.

**2020 Status: Addressed but remains a priority.** African Americans continue to have the lowest approval rates for home purchase loans and Hispanics have the lowest approval rate for refinance loans.

**Recommendation:** Continue monitoring HMDA data and affirmatively market the availability of first-time homebuyer assistance programs that provide down payment assistance to low- and moderate-income homebuyers. Additionally, the City will encourage attendance at any homebuyer education training workshops convened in the City or adjacent areas by its fair housing service provider or other qualified entities. The City and its contracted fair housing service provider may provide written outreach to lending institutions regarding the City’s commitment to eliminate racial discrimination in lending patterns; to encourage attendance of all staff at IFHMB workshops; and to provide flyers regarding FTHB education, including IFHMB’s FAQ on the City’s website.

**2007 Impediment No. 5** involves a trend whereby complaints received by the City’s contracted fair housing service provider on the basis of disability continue to be the leading basis of all discrimination complaints. This demonstrates a lack of understanding and sensitivity of the fair housing rights of the disabled by the housing industry.

**2020 Status: Addressed but remains a priority.** According to data from the City’s contracted fair housing service provider, discrimination against persons with disabilities continues to be the leading basis of discrimination. From July 1, 2017 to June 30, 2018, there were 35 allegations of discrimination on the basis of disability from Fontana residents, representing 64 percent of all complaints.

**Recommendation:** Continue working with the City’s contracted fair housing service provider to provide recommendations of properties believed to be discriminatory in their practices as information is received; facilitate accessibility reviews of multi-family properties; and distribute design and construction information to all who inquire about building permits. Providing literature regarding the Fair Housing Act’s seven design and construction requirements to

property owners and managers may also help to address the relatively high proportion of complaints based on disability.

**2007 Impediment No. 6** identifies a general lack of awareness of fair housing laws. This finding is informed by the increasing number of fair housing complaint intakes performed by the City's contracted fair housing service provider and their interaction with housing providers and housing seekers during workshops which demonstrated a lack of understanding of both Federal and State fair housing laws.

**2020 Status: Addressed but remains a priority.** The City received data from its fair housing service provider showing current information about fair housing complaint intakes. The data indicates that the number of fair housing complaints in Fontana is somewhat higher than those of neighboring Cities in the housing market area.

**Recommendation:** Continue working with Inland Fair Housing and Mediation Board (IFHMB) to provide opportunities for conducting Fair Housing workshops in the City and providing IFHMB outreach materials as a part the City's newsletter and utility bill mailings. Encourage collaboration with local realtors; providing recurring education to members of the Inland Valleys Association of Realtors; offering no-cost Fair Housing workshops; and developing a fair housing FAQ for the City's website.

The City has a fair housing link to the Services page of the City of Fontana's website, as well as on the Housing Authority page. Continue providing fair housing material at several community events including a City meeting with local community-based organizations, Citrus Head Start Resources Fair, a Housing Rights and Responsibilities workshop and Health Resources Fair at the Fontana Senior Center. Continue releasing cable bulletins via the City's Community Channel for recruiting testers, familial status, general housing discrimination and domestic violence at various times during the year.

**2010 Impediment No. 7: Transit Access.**

Transit provides elderly people, low income people, youth, and others access to jobs, medical facilities, parks, housing, and public services. Omnitrans, the City's transit provider, has adopted service standards to ensure an equitable distribution of services. For instance, all areas having a minimum residential density of 3.5 dwelling units per acre or employment density of 10 jobs per acre, as measured over an area of 25 acres, should be provided with a transit service that places 90 percent of residences and jobs within one half mile of a bus stop. Closer analysis of Fontana's development patterns reveals two (2) underserved areas, as follows:

- **Falcon Ridge / Summit Avenue Job Center:** Omnitrans does not have a bus route connecting the public transit system to the Falcon Ridge and Summit shopping centers located on either side of Summit Avenue off of the 1-15 freeway in North Fontana. This is a major new employment center that includes shops, restaurants and stores such as Target, Kohls, Staples, and Stater Brothers. This shopping center serves emerging residential developments in North Fontana. Fontana and the City of Rialto are experiencing a significant amount of commercial and residential development in this area along the I-15 and 210 Freeways which should increase ridership potential.
- **Southwest Industrial / Jurupa Hills Job Centers:** Bus route 82 is the southwestern-most as well as the northernmost bus route in the City, running east-west in the south for miles along Jurupa Avenue, and north along Sierra Avenue from Jurupa up to the 210 freeway. An extension of this line or another route along Slover Avenue just south of the 10 freeway would connect residents to two of the top 10 employers in Fontana that are not located within one-half mile of a bus stop. These include Sierra Pacific Aluminum, located 0.8 miles from the bus stop at Mulberry and Marley; and Estes West, located 0.7 miles from the bus stop at Jurupa and Cherry.

**2020 Status: In Progress.** Based on evaluation of ridership and ability to provide fixed route service, the bus routes in Fontana remain largely as they were in 2015. The City will continue to monitor Omnitrans Transit Plans and advocate when possible for additional service. In the last five years, the City has worked with Omnitrans to provide a bus route with new stops in the Northern areas of the City (Route 82: Rancho Cucamonga-Fontana-Sierra Lakes). The City of Fontana continues to work with Omnitrans on bus routes throughout Fontana. That process includes evaluating current and potentially future lines (based upon anticipated development). The current priorities include identifying locations for the installation of bus turnouts and bus shelters. Omnitrans services are generally in response to both demand (ridership) and by new housing development (in both Central and North Fontana).

**Recommendation:** Continue to build and expand public transportation opportunities servicing the Falcon Ridge / Summit Avenue Job Center and the Southwest Industrial / Jurupa Hills Job Centers.

**2010 Impediment No. 8: Reasonable Accommodation.**

Part of the American dream involves owning a home in a safe neighborhood near community amenities. Homeownership is believed to enhance one's sense of well-being, help accumulate wealth, and strengthen neighborhoods, because residents with a greater stake in their community will be more active in decisions affecting their

community. Ensuring fair housing is an important way to improve the housing opportunities for residents in Fontana.

A significant portion of the housing in Fontana was built before the advent of modern accessibility standards, thus modifications to homes may be needed to allow access by a disabled person. The City allows property owners to install features to accommodate disabled persons upon payment of building and planning fees and a zone variance application fee. Although the variance, if approved, provides for reasonable accommodation, the high cost of the variance coupled with the time delay associated with application and approval can be a deterrent to making lower cost improvements necessary for accessibility purposes. Although a variance is a permissible way to make reasonable accommodations, situations could arise where a request could be denied under a variance finding but still be valid as a reasonable accommodation.

**2020 Status: In Progress.** An amendment to the Development Code has not been made to date. The City's practice is to follow State law (SB 520) and staff is directed to waive any minor variance fees for the disabled.

**Recommendation:** Implement Housing Production Strategy 4.1 of the 2014-2021 Housing Element. To comply with Federal and State housing laws (SB 520), the City will analyze existing land use controls, building codes, and permit and processing procedures to determine constraints they impose on the development, maintenance, and improvement of housing for persons with disabilities. Based on its findings, the City will develop a policy for reasonable accommodation to provide relief from Code regulations and permitting procedures that have a discriminatory effect on housing for individuals with disabilities. The procedures shall include the process for requesting accommodation, a timeline for processing and appeals, criteria for determining whether a requested accommodation is reasonable, and ministerial approval for minor requests.

**2010 Impediment No. 9: Multi-Family Civil Rights Compliance.**

As part of the City's Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City must examine Federal and contractual civil rights compliance requirements on all City-owned multi-family residential properties.

**2020 Status: Ongoing.** The City continues to examine and monitor all Housing Authority / City-owned multi-family residential properties to ensure compliance with Federal and contractual civil rights compliance requirements.

**Recommendation:** As part of the City's Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the

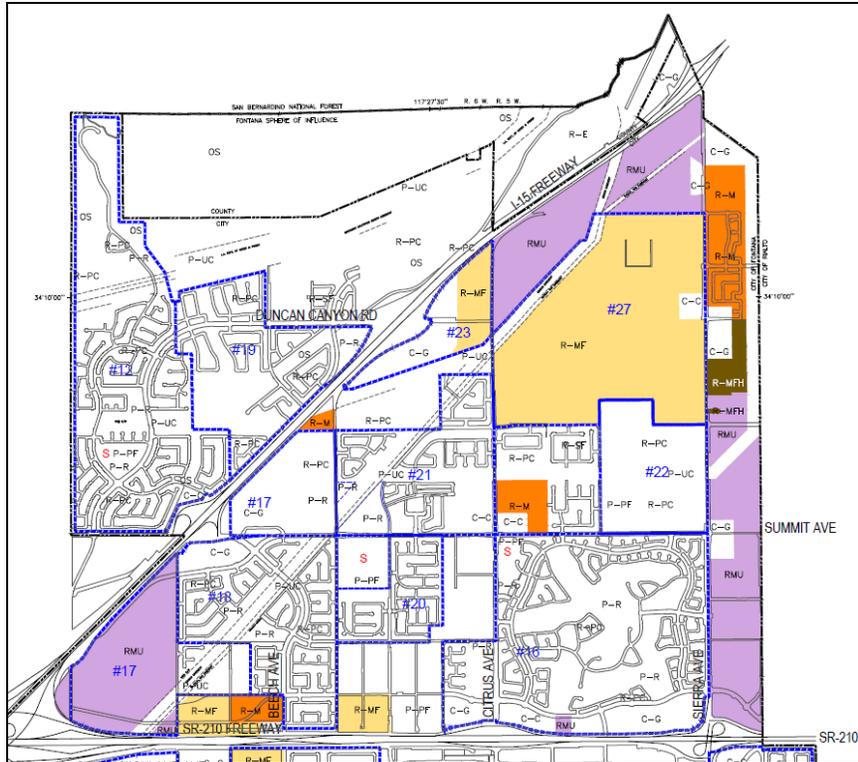
City should continue to examine Federal and contractual civil rights compliance requirements on all City-owned multi-family residential properties to ensure ongoing compliance.

**2010 Impediment No. 10: North Fontana Affordable Multi-Family Development.**

As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City must examine opportunities for the creation of new, affordable multi-family housing (government assisted as well as private developments) to be distributed equitably throughout the City—and to be located particularly in North Fontana. HUD’s letter of findings dated April 6, 2007 asserts that North Fontana (the area of the City north of the 210 Freeway) is populated predominately by non-Hispanic Whites, causing “de facto segregation” in the area. HUD further indicated that new developments that are age restricted (i.e. Senior Housing) must be equitably matched with new units that are not age-restricted.

Analysis of the current General Plan Land Use and Zoning Maps indicate that there are several in North Fontana where multi-family developments are permitted by right.

**2020 Status: Ongoing.** Evaluation of the General Plan Land Use and Zoning Maps (revised February 5, 2015) indicates a significant amount of presently undeveloped land set aside for Medium Density Residential (R-M, min. 7.7 dwelling units per acre), Multi-Family Residential (R-MF, minimum 12.1 dwelling units per acre), Multi-Family Medium/High Residential (R-MFMH, minimum 24.1 dwelling units per acre), Multi-Family High Residential (R-MFH, minimum 39.1 dwelling units per acre), and Regional Mixed Use (RMU, minimum 12 dwelling units per acre). As the City continues to coordinate infrastructure improvements—including the construction of the Duncan Canyon Road overpass / interchange at I-15 that will be necessary to support future housing development in the specific plan areas labeled #23 and #27 on the map below, and as new housing construction and housing demand continue to rebound from the economic recession, it is expected that new residential multifamily development will occur in North Fontana in the future. The map below indicates where future multi-family affordable housing projects in North Fontana may be located.



Although the City has taken action through zoning amendments, private developers have not approached the City about undertaking new affordable multi-family development in any of the shaded areas shown on the map excerpt above representing opportunities for the northern part of the City. This impediment will be retained as part of the 2020 AI so that the City may continue to monitor to ensure that affordable multi-family housing is distributed equitably throughout the community.

With respect to HUD’s assertion in its monitoring review letter from 2007 concerning segregation within the community, an analysis of the racial/ethnic attributes of the residents of North Fontana was conducted and it has been determined that as a result of changes to market conditions since HUD’s 2007 evaluation, the area of Fontana north of the 210 freeway is no longer a majority White area. Refer to the race / ethnicity maps in Chapter 2.

**2015 Impediment No. 1: Transitional and Supportive Housing**

State law requires cities to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of transitional and permanent supportive housing. The courts have also passed subsequent rulings.<sup>1</sup> To that end, State Law (SB2) requires jurisdictions to designate a zone and permitting process to facilitate the siting of such uses. If a conditional use

<sup>1</sup>Hoffmaster v. City of San Diego, 55 Cal.App.4th 1098

permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities.

The City of Fontana Zoning Code does not currently provide zoning and development standards that facilitate the siting and development of transitional and supportive housing.

**2020 Status: Ongoing.** The City continues to evaluate ways to comply with SB-2 and provide the required zoning and development standards. On October 28, 2014, the City enacted Ordinance 1708, which established an Emergency Shelter Overlay District in Light Industrial land use designations.

**Recommendation:** To comply with SB-2, the City should analyze and revise the existing Zoning and Development Code to allow for emergency shelters, transitional housing and supportive housing to homeless individuals and families for annual and seasonally estimated need. The City should comply with the requirements of the State in the following manner:

- Ensure the provisions of the Housing Accountability Act are enforced and remove the potential for denial of emergency shelter/transitional housing facility via discretionary approvals if such housing is otherwise consistent with adopted regulatory standards.
- Evaluate development standards and regulatory provisions to ensure that standards encourage, rather than discourage, development.
- Amend the Fontana Municipal Code to permit transitional, supportive and single-room occupancy housing as a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.

## B. New Impediments

This 2020 AI did not reveal any additional impediments.

## C. Recommendations to Address Impediments to Fair Housing Choice

This AI identifies common problems and barriers to fair housing in Fontana. This section builds upon the previous analysis, outlines conclusions, and provides recommendations for the City to address impediments to the fair housing identified earlier. These recommendations will serve as the basis for the City to develop an action plan to eliminate identified Impediments. The recommendations listed in **Table VI-1** on the following page are designated for action by the City, and other service agencies that assist Fontana residents.

**Table VI-1  
Fair Housing Plan Recommendations**

Impediments		Recommendations	Lead Agency	Timeframe
1.	Lending Patterns: Discrimination based on Race	Continue monitoring HMDA data and affirmatively market the availability of first-time homebuyer assistance programs that provide down payment assistance to low- and moderate-income homebuyers. Additionally, the City will encourage attendance at any homebuyer education training workshops convened in the City or adjacent areas by its fair housing service provider or other qualified entities. The City and its contracted fair housing service provider may provide written outreach to lending institutions regarding the City's commitment to eliminate racial discrimination in lending patterns; to encourage attendance of all staff at IFHMB workshops; and to provide flyers regarding FTHB education, including IFHMB's FAQ on the City's website.	City of Fontana	6/30/25
2.	Discrimination against Persons With Disabilities	Continue working with the City's contracted fair housing service provider to provide recommendations of properties believed to be discriminatory in their practices as information is received; facilitate accessibility reviews of multi-family properties; and distribute design and construction information to all who inquire about building permits. Providing literature regarding the Fair Housing Act's seven design and construction requirements to property owners and managers may also help to address the relatively high proportion of complaints based on disability.	City of Fontana	6/30/25

Impediments		Recommendations	Lead Agency	Timeframe
3.	Lack of Awareness of Fair Housing Laws	Continue working with Inland Fair Housing and Mediation Board (IFHMB) to provide opportunities for conducting Fair Housing workshops in the City and providing IFHMB outreach materials as a part the City’s newsletter and utility bill mailings. Encourage collaboration with local realtors; providing recurring education to members of the Inland Valleys Association of Realtors; offering no-cost Fair Housing workshops; and developing a fair housing FAQ for the City’s website. The City has a fair housing link to the Services page of the City of Fontana’s website, as well as on the Housing Authority page. Continue providing fair housing material at several community events including a City meeting with local community-based organizations, Citrus Head Start Resources Fair, a Housing Rights and Responsibilities workshop and Health Resources Fair at the Fontana Senior Center. Continue releasing cable bulletins via the City’s Community Channel for recruiting testers, familial status, general housing discrimination and domestic violence at various times during the year.	City of Fontana	6/30/25
4.	Transit Access	Continue to advocate for expanded public transportation opportunities servicing the Falcon Ridge / Summit Avenue Job Center and the Southwest Industrial / Jurupa Hills Job Centers.	City of Fontana	6/30/25

Impediments		Recommendations	Lead Agency	Timeframe
5.	Reasonable Accommodation	Implement Housing Production Strategy 4.1 of the 2014-2021 Housing Element. To comply with Federal and State housing laws (SB 520), the City will analyze existing land use controls, building codes, and permit and processing procedures to determine constraints they impose on the development, maintenance, and improvement of housing for persons with disabilities. Based on its findings, the City will develop a policy for reasonable accommodation to provide relief from Code regulations and permitting procedures that have a discriminatory effect on housing for individuals with disabilities. The procedures shall include the process for requesting accommodation, a timeline for processing and appeals, criteria for determining whether a requested accommodation is reasonable, and ministerial approval for minor requests.	City of Fontana	6/30/25
6.	Multi-Family Civil Rights Compliance	As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City will continue to examine Federal and contractual civil rights compliance requirements on all City-owned multi-family residential properties to ensure ongoing compliance.	City of Fontana	6/30/25
7.	Multi-Family Development	As part of the City’s Section 109 Voluntary Compliance Agreement with the U.S. Department of Housing and Urban Development, the City will examine opportunities for the creation of new, less expensive multi-family housing (government assisted as well as private developments) to be distributed equitably throughout the City—particularly in the undeveloped areas zoned for multi-family development in North Fontana.	City of Fontana	6/30/25

Impediments		Recommendations	Lead Agency	Timeframe
8.	Transitional and Supportive Housing	<p>To comply with SB-2, the City should analyze and revise the existing Zoning and Development Code to allow for emergency shelters, transitional housing and supportive housing to homeless individuals and families for annual and seasonally estimated need. The City should comply with the requirements of the State in the following manner:</p> <ul style="list-style-type: none"> <li>• Ensure the provisions of the Housing Accountability Act are enforced and remove the potential for denial of emergency shelter/transitional housing facility via discretionary approvals if such housing is otherwise consistent with adopted regulatory standards.</li> <li>• Evaluate development standards and regulatory provisions to ensure that standards encourage, rather than discourage, development.</li> <li>• Amend the Fontana Municipal Code to permit transitional, supportive and single-room occupancy housing as a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.</li> </ul>	City of Fontana	6/30/25

**Signature Page**

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

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Michael Milhiser  
Interim City Manager

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Date