

Apple Valley/Victorville Consortium

Analysis of Impediments to Fair Housing Choice



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Town of Apple Valley - 14955 Dale Evans Parkway, Apple Valley, CA 92307

City of Victorville - 14343 Civic Drive, Victorville, CA 92393

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Executive Summary

As a recipient of federal housing and community development entitlement funds, the Town of Apple Valley and the City of Victorville are required to undertake fair housing planning to affirmatively further fair housing. This planning includes conducting an Analysis of Impediments to Fair Housing Choice (AI) and developing an action plan to address those impediments. This AI is a review of the laws, regulations, administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing in both jurisdictions, as well as an assessment of conditions, both public and private, affecting fair housing choice in the Town of Apple Valley and City of Victorville. This AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

Community Background

The Town of Apple Valley and City of Victorville are located in the Victor Valley area of San Bernardino County. This area, located near the southern edge of the Mojave Desert, is often referred to as the high desert. Both jurisdictions are conveniently located off Interstate 15, north of the San Bernardino Mountains, with Apple Valley located east of I-15 and Victorville spanning I-15 and located primarily to the west.

The Town of Apple Valley, incorporated in 1988, encompasses 78 square miles. The Town is planning to complete annexation of approximately five square miles by June of 2012. The triangle shape above and north of Census Tract 121 (Block Group 3) and the section adjacent and east of Census Tract 121 (Block Group 6) will be part of the new incorporated boundaries. There are a few scattered homes (50-60) north of CT 121 (BG 6) that are predominantly dilapidated. The Town is heavily marketing the RRLP Program in this area. There are no residences east of CT 121 (BG 6) as the land uses are predominantly industrial. There is currently no other development in the annexed areas. The 2010 Census reported a population of 69,135 people in Apple Valley.

The City of Victorville incorporated in 1962 and has grown to encompass over 74 square miles. The City's 2010 population was 115,903 people. Both cities experienced extensive population growth in the 1980s and again between 2000 and 2010. Specifically, Victorville experienced tremendous growth (81 percent population growth) between 2000 and 2010, compared to both Apple Valley (27 percent) and San Bernardino County as a whole (19 percent).

Both the Town of Apple Valley and the City of Victorville have increased in population and in diversity over the past 20 years, as indicated in Table 8. These trends are similar to those of other communities throughout California. Race and ethnicity can have implications for housing choice, as certain demographic and economic variables correlate with race. From 2000 to 2010, the overall percentage of White persons in both communities declined, continuing the trends from the 1990s, while the percentage of Hispanic persons increased.

The number of households in Apple Valley and Victorville increased between 2000 and 2010; Apple Valley households increased 17 percent, from 20,161 to 22,566 households, and Victorville households increased dramatically—44 percent—from 22,656 to 32,558 households in 2010. As shown in Table 15, the majority of households in Apple Valley and Victorville are families (75 percent and 80 percent, respectively). Approximately 20 percent of all families are female-headed households with children, slightly lower than the County average of 22 percent. The average household size in the Town of Apple Valley is estimated to have remained stable since the 2000 Census at 2.91 persons. In Victorville, the size increased from 3.03 persons per household in 2000 to 3.4 persons per household in 2010.

Among all households, approximately 32 percent included at least one or more elderly persons in Apple Valley, while only 21 percent of households in Victorville included an elderly person. Victorville's proportion of elderly persons within households is similar to that of the County as a whole.

The 2010 Census reported 26,117 housing units in Apple Valley. Overall, Apple Valley had an average of 2.9 persons per household in 2010. Between 2000 and 2010, the Town experienced a 30 percent increase (5,954 units) in the housing stock from the Census-reported inventory of 20,163 units in 2000. Approximately 9.6 percent of all housing units were vacant in 2010.

In Victorville, the 2010 Census reported 36,655 housing units. Victorville had an average of 3.56 persons per household in 2010. Between 2000 and 2010, the City experienced a 63 percent increase (14,157 units) in the housing stock from the Census-reported inventory of 22,498 units in 2000. Approximately 11.2 percent of all housing units were vacant.

The housing stock in Apple Valley and Victorville largely consists of single-family detached homes. According to 2006-2010 ACS Five-Year Estimates, single-family detached homes accounted for 76 percent and 79 percent of the housing stock in Apple Valley and Victorville, respectively; single-family attached and multi-family housing accounted for 18 percent in Apple Valley and 16 percent in Victorville. About five percent of housing units in Apple Valley and Victorville are mobile homes. Surrounding jurisdictions share similar housing type characteristics, with all surrounding jurisdictions having considerably greater proportions of single-family homes. A total of 71 percent of housing units in San Bernardino County are single-family homes, with only 22 percent multi-family and six percent mobile homes.

According to the 2006-2010 American Community Survey (ACS), San Bernardino County households had a median income of \$55,845. Table 10 shows the median household income for Apple Valley and Victorville provided by the 2000 Census and the 2006-2010 ACS. The median household income reported in the 2000 Census for the Town of Apple Valley was higher than that of surrounding cities, but slightly lower than countywide median. Victorville's median income reported in the 2000 Census was lower than Apple Valley, the County, and most surrounding cities. Both jurisdictions experienced increases in median income between 2000 and 2010, with Victorville's median income increasing dramatically (48 percent). In 2010, median incomes in Apple Valley (\$50,066) and Victorville (\$53,566) median incomes remained below the County at large (\$55,845); however, they were somewhat higher than most surrounding jurisdictions, with the exception of Yucaipa.

In Apple Valley and Victorville, like home sales throughout the Southern California region, housing sales prices rose dramatically from 2002 through 2006 then drastically decreased in the subsequent four years. Housing prices in Apple Valley and Victorville are generally lower than San Bernardino County as a whole and significantly lower than the Southern California regional median housing sale price, which peaked at \$552,000 in 2007 and was estimated at \$291,000 in 2010.

The 2006-2010 ACS Five-Year Estimate identified median rents of \$818 in Apple Valley and \$896 in Victorville. A point-in-time review of housing units for rent in Apple Valley and Victorville was conducted in February 2012. At that time, rents within the Consortium area ranged from \$400 for a studio apartment to \$1,500 for a four-bedroom unit.

Outreach Process for Developing the AI

To ensure the AI accurately reflects the community's needs, a community outreach program consisting of four public meetings and a fair housing survey were conducted as part of the development of this report. Four public meetings were held to solicit input from the general public, service providers, and housing professionals. With the outreach efforts described above, attendance at the fair housing meetings was fair. About 25 residents and representatives of service provider agencies attended these meetings. In reviewing the comments received at these meetings, the following key issues were identified:

Focus Group Meetings Summary

Two focus group meetings were held in December 2012 -- Apple Valley (December 15 morning) and Victorville (December 8 morning). The focus group meetings were held to discuss priority housing and community development needs in the respective jurisdictions, including fair housing issues and concerns. Each focus group meeting was structured in the same format: participants were introduced to the Consolidated Plan and Analysis of Impediments (AI) to Fair Housing Choice process through a presentation and then asked to discuss housing and community development needs, including fair housing issues and concerns. Below is a summary of housing-related issues identified during the focus group meetings.

Foreclosures

Members of the community have expressed a great deal of concern about the lack of security for the region's numerous foreclosed properties. Housing professionals specifically have noted that theft and vandalism on foreclosed properties is a major concern, especially for surrounding homes and neighborhoods.

Access to Supportive Services and Programs

While there are many supportive programs and services available in San Bernardino County, they are concentrated in the City of San Bernardino. Services in the high desert area are limited. Furthermore, public transit in the Victor Valley region is inadequate to meet the needs of residents. Participants noted that service was infrequent and schedules were difficult to decipher. As a result, it often takes an entire day to travel from one side of the Victor Valley region to the other using public transit.

Public Workshops Summary

Two public workshops were held in December 2012 – Apple Valley (December 15 evening) and Victorville (December 8 evening). The public workshops were held to discuss priority housing and community development needs in the respective jurisdictions, including fair housing issues and concerns. Each public workshop was structured in the same format: participants were introduced to the Consolidated Plan and Analysis of Impediments (AI) to Fair Housing Choice process through a presentation and then asked to discuss housing and community development needs, including fair housing issues and concerns. To facilitate this discussion, an interactive exercise was conducted to help residents prioritize limited resources.

Overall, meeting participants noted increasing needs among residents and the Southern California area at large at a time of increased unemployment and financial uncertainty. Below is a summary of housing-related issues identified during the public workshops.

Homelessness

Homelessness was one of the primary issues discussed by participants, especially at the Victorville meeting. Participants noted the need for a homeless center in the City. The high desert is subject to extreme temperatures that can result in dangerous conditions for homeless persons. Most homeless services are located “down the hill” in the City of San Bernardino or other southern jurisdictions.

Housing

Housing was another need discussed by participants at the meetings. Participants were primarily concerned about housing affordability and housing condition. Participants discussed the housing needs of seniors with limited income, and the condition of existing housing; certain participants were concerned about existing blighted/unmaintained rental apartments.

Neighborhoods

Participants stated the importance of crime-free, safe neighborhoods. Participants noted that if a community is safe and there are places for people to go (commercial and community-based), then residents will tend to remain in the community. The importance of maintaining a safe, well-maintained community was emphasized at the meetings.

In addition to the meetings, a Fair Housing Survey was also created. The Fair Housing Survey sought to gain knowledge about the nature and extent of fair housing issues experienced by Apple Valley and Victorville residents. The survey consisted of ten questions designed to gather information on a person’s experience with fair housing issues and perception of fair housing issues in his/her neighborhood.

The survey was available in English and Spanish, and distributed via the following methods:

- Distributed at various community locations and public counters.
- Posted on the websites of both Apple Valley and Victorville.
- Solicited the participation of service providers to also post the survey link on their websites and to help distribute surveys to their clients.

Fair Housing: Conclusions

The following summarizes the major conclusions reached as a result of the preparation of this AI. The appropriate actions to address these concerns are outlined in Chapter 8 of this AI.

Impediment – Housing Discrimination: Housing discrimination persists in both communities, with disability, race, and familial status being the top bases for discrimination. In recent years, housing discrimination against persons with disabilities has increased significantly. Housing advocates also indicate that seniors, persons with disabilities, and large families are often discriminated in the housing market.

Impediment – Public Outreach: Many residents are not aware of fair housing rights and services available. When encountered with fair housing issues, many do not believe reporting the incidents would help the situation. Some are also afraid of retaliation by the owners.

Impediment – Housing Choice Vouchers and Affordable Housing Units: Hispanic households are underrepresented in Housing Choice Voucher program. However, the Housing Choice Voucher program has closed its waiting list for several years, leaving the HACSB little ability to provide additional vouchers to new households who may reflect the current demographic profile of the County.

Impediment – Housing for Persons with Disabilities: Accessible housing units and other housing options (such as transitional and supportive housing) for persons with disabilities are limited in supply.

Impediment – Lending Practices: Black households in general, seem to have more difficulty accessing financing. They experienced lower approval rates than other households in the same income group. Since 2007, the rate spreads for all race/ethnic groups have decreased significantly except for Black households. The rate spread for Black households remained the highest among all groups and actually has increased since 2007. Among the top lenders, minority households also have high fallout rates (not completing or withdrawing an application).

Impediment – Public Transportation System: The County of San Bernardino has invested a majority of its housing resources in areas “down the hill” in the City of San Bernardino. Many lower income households, seniors, and persons with disabilities have difficulty accessing these resources as they are dependent on the public transportation system, which many find difficult to navigate.

Impediment – Foreclosures: Both Apple Valley and Victorville are impacted by the large number of foreclosures. Abandoned and foreclosed homes are often vandalized and trespassed, negatively impacting neighborhood safety and conditions. The lack of maintenance of foreclosed properties is a serious issue expressed by many participants of public meetings conducted as part of this AI.

Impediment – Real Estate Advertising: Advertising of for-sale homes and particularly rental listings contain potentially discriminatory language. Often such language encourages or

discourages a particular group to inquire about the housing available. Given the market condition, many homes are being used as rentals. Owners of these units may not be professional landlords and therefore are not familiar with fair housing rights and responsibilities.

Impediment – Accessibility of Public Facilities: Not all public buildings are accessible to persons with disabilities. Accessible sidewalks with ramps and curb cuts are also needed to allow circulation from one location to another.

Chapter 1: Introduction

The Town of Apple Valley and City of Victorville are located in the western portion of San Bernardino County within what is known as the Victor Valley. Both jurisdictions are conveniently located off of Interstate 15, north of the San Bernardino Mountains, and are often referred to as part of the high desert.

A. Purpose of the Report

The Town of Apple Valley and City of Victorville have established a commitment towards providing equal housing opportunities for its existing and future residents. Through the federally-funded Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs, and other state and local programs, the two jurisdictions work to provide a decent living environment for all. The Town of Apple Valley and City of Victorville formed a consortium for purposes of receiving CDBG and HOME funds.

Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)], to receive CDBG funds, a jurisdiction must certify that it “actively furthers fair housing choice” through the following:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI);
- Actions to eliminate identified impediments; and
- Maintenance of fair housing records.

This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the “AI”), presents a demographic profile of the Town of Apple Valley and the City of Victorville, assesses the extent of fair housing issues among specific groups, and evaluates the availability of a range of housing choices for all residents. This report also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person’s access to housing.

B. Legal Framework

Fair housing is a right protected by both Federal and State of California laws. Among these laws, virtually every housing unit in California is subject to fair housing practices.

1. Federal Laws

The federal **Fair Housing Act of 1968** and **Fair Housing Amendments Act of 1988** (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on the following protected classes:

- Race or color
- Religion
- Sex

- Familial status
- National origin
- Disability (mental or physical)

Specifically, it is unlawful to:

- Refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, disability, familial status, or national origin.
- Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, disability, familial status, or national origin.
- Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.
- Represent to any person because of race, color, religion, sex, disability, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.
- For profit, induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status, or national origin.

Reasonable Accommodations and Accessibility: The Fair Housing Amendments Act requires owners of housing facilities to make “reasonable accommodations” (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. For example, a landlord with a “no pets” policy may be required to grant an exception to this rule and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces, at the tenant’s own expense. Finally, the Act requires that new multi-family housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

HUD Final Rule on Equal Access to Housing in HUD Programs: On March 5, 2012, HUD published the Final Rule on “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.” It applies to all McKinney-Vento-funded housing programs, as well as to other housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person’s marital status, sexual orientation, or

gender identity (a person's internal sense of being male or female) in making homeless housing assistance available.

2. California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The **Fair Employment and Housing Act** (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex
- Marital status
- Source of income
- Sexual orientation
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age

In addition, the FEHA contains similar reasonable accommodations and accessibility provisions as the federal Fair Housing Amendments Act.

The **Unruh Civil Rights Act** provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, or medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.

Furthermore, the **Ralph Civil Rights Act** (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.

Hate violence can be: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The **Bane Civil Rights Act** (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

And, finally, **California Civil Code Section 1940.3** prohibits landlords from questioning potential residents about their immigration or citizenship status. Landlords in most states are free to inquire about a potential tenant's immigration status and to reject applicants who are in the United States illegally. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.

In addition to these acts, **Government Code Sections 11135, 65008, and 65580-65589.8** prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)
- Housing for extremely low-income households, including single-room occupancy units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

3. Fair Housing Defined

In light of the various pieces of fair housing legislation passed at the federal and state levels, fair housing throughout this report is defined as follows:

A condition in which individuals of similar income levels in the same housing market have a like range of choice available to them regardless of race, color, ancestry, national origin, religion, sex, disability/medical conditions, age, marital status, familial status, sexual orientation, gender identity, source of income, or any other category which may be defined by law now or in the future.

Housing Issues, Affordability, and Fair Housing

HUD's Fair Housing and Equal Opportunity (FHEO) Division draws a distinction between housing affordability and fair housing. Economic factors that affect a household's housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity, and other factors create misconceptions, biases, and differential treatments would fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatment.

4. Impediments Identified

Within the legal framework of federal and state laws, and based on the guidance provided by HUD's *Fair Housing Planning Guide*, impediments to fair housing choice can be defined as:

Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability/medical conditions, age, marital status, familial status, sexual orientation, gender identify, or source of income which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability/medical conditions, age, marital status, familial status, sexual orientation, gender identity, or source of income.

To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice. Furthermore, eligibility for certain federal funds requires the compliance with federal fair housing laws.

5. Organization of the Report

This report is divided into eight chapters:

Chapter 1: Introduction defines "fair housing" and explains the purpose of this report.

Chapter 2: Community Participation describes the community outreach program and summarizes comments from residents and various agencies on fair housing issues such as discrimination, housing impediments, and housing trends.

Chapter 3: Community Profile presents the demographic, housing, and income characteristics in Apple Valley and Victorville. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed. In addition, this section evaluates if community residential care facilities, public and assisted housing projects, as well as Housing Choice Voucher (Section 8) recipients in both jurisdictions, are unduly concentrated in low- and moderate-income areas. Also, the degree of housing segregation based on race is evaluated by computing the Index of Dissimilarity.

Chapter 4: Lending Practices assesses the access to financing for different groups. Predatory and subprime lending issues are discussed.

Chapter 5: Public Policies analyzes various public policies and actions that may impede fair housing within the two jurisdictions.

Chapter 6: Fair Housing Profile evaluates existing public and private programs, services, practices, and activities that assist in providing fair housing in both jurisdictions. This chapter also assesses the nature and extent of fair housing complaints and violations in Apple Valley and Victorville. Trends and patterns of impediments to fair housing, as identified by public and private agencies, are included.

Chapter 7: Progress since Previous AIs evaluates the progress toward addressing impediments to fair housing choice, as identified in previous Analyses of Impediments to Fair Housing Choice.

Chapter 8: Fair Housing Action Plan summarizes the findings regarding fair housing issues in both jurisdictions and provides a plan of action for furthering fair housing practices.

This report also includes a Signature Page with the signatures of the Chief Elected Official of each jurisdiction, together with a statement certifying that the Analysis of Impediments represents the Town of Apple Valley's and the City of Victorville's official conclusions regarding impediments to fair housing choice and the actions necessary to address identified impediments.

Chapter 2: Community Participation

This Analysis of Impediments (AI) to Fair Housing Choice report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To assure the report responds to community needs, a community outreach program consisting of public meetings, a fair housing survey, and consultation with agencies and community stakeholders was conducted in the development of this report. The outreach program for the AI was conducted jointly with the Apple Valley/Victorville Consortium's Consolidated Plan development process. This chapter describes the community outreach program conducted for this report.

A. Public Meetings

Four public meetings were held to solicit input from the general public, service providers, and housing professionals, including:

- Real estate associations/realtors
- Apartment owners and managers associations
- Banks and other financial institutions
- Fair housing service providers
- Supportive service providers and advocacy groups (e.g., for seniors, families, disabled persons, immigrant groups)
- Educational institutions
- Faith-based organizations
- Housing providers

As summarized in Table 1, four separate meetings were held in the Town of Apple Valley and City of Victorville. Each meeting targeted a specific group of stakeholders for a particular jurisdiction. Two meetings were held for housing professionals, service providers, and community stakeholders. Two other meetings were held for the general public.

To encourage attendance and participation, the meetings were publicized through the following methods:

- Mailings to over 350 service providers, housing professional, and community stakeholders were sent out.
- Direct phone calls as reminders to key agencies.
- Advertisements were published in the Victor Valley Daily Press
- Flyers were posted on each jurisdiction's website.
- Cable television segment: The Voice of Inland Empire
- Information was provided on Facebook and Twitter
- Advertisements provided on each jurisdiction's bus transit system

With the outreach efforts described above, attendance at the fair housing meetings was fair. About 25 residents and representatives of service provider agencies attended these meetings.

Table 1: Community Meeting Locations		
Meeting Type	Location	Date/Time
Apple Valley		
Focus Group Meeting	Conference Center 14975 Dale Evans Parkway Apple Valley, CA 92307	Thursday, December 15, 2011 10:00 AM - 12:00 PM
Public Workshop	Conference Center 14975 Dale Evans Parkway Apple Valley, CA 92307	Thursday, December 15, 2011 6:30 PM - 8:30 PM
Victorville		
Focus Group Meeting	Victorville City Hall Conference Room D 14343 Civic Drive Victorville, CA 92392	Thursday, December 8, 2011 10:00 AM - 12:00 PM
Public Workshop	Victorville City Hall Conference Room D 14343 Civic Drive Victorville, CA 92392	Thursday, December 8, 2011 6:30 PM - 8:30 PM

1. Meeting Participants

Aside from interested individuals, several service providers and housing professionals participated in the fair housing public meetings, including:

- Family Assist
- PRMG Mortgage
- Feed My Sheep in the High Desert
- Union Bank
- High Desert Hispanic Foundation
- Victor Valley Unified High School District
- Delta Sigma Theta Sorority
- City of Hesperia
- County of San Bernardino

2. Key Issues Identified

Focus Group Meetings Summary

Two focus group meetings were held in December 2012 -- Apple Valley (December 15 morning) and Victorville (December 8 morning). The focus group meetings were held to discuss priority housing and community development needs in the respective jurisdictions, including fair housing issues and concerns. Each focus group meeting was structured in the same format: participants were introduced to the Consolidated Plan and Analysis of Impediments (AI) to Fair Housing Choice process through a presentation and then asked to discuss housing and

community development needs, including fair housing issues and concerns. Below is a summary of housing-related issues identified during the focus group meetings.

Foreclosures

Members of the community have expressed a great deal of concern about the lack of security for the region's numerous foreclosed properties. Housing professionals specifically have noted that theft and vandalism on foreclosed properties is a major concern, especially for surrounding homes and neighborhoods.

Access to Supportive Services and Programs

While there are many supportive programs and services available in San Bernardino County, they are concentrated in the City of San Bernardino. Services in the high desert area are limited. Furthermore, public transit in the Victor Valley region is inadequate to meet the needs of residents. Participants noted that service was infrequent and schedules were difficult to decipher. As a result, it often takes an entire day to travel from one side of the Victor Valley region to the other using public transit.

Public Workshops Summary

Two public workshops were held in December 2012 – Apple Valley (December 15 evening) and Victorville (December 8 evening). The public workshops were held to discuss priority housing and community development needs in the respective jurisdictions, including fair housing issues and concerns. Each public workshop was structured in the same format: participants were introduced to the Consolidated Plan and Analysis of Impediments (AI) to Fair Housing Choice process through a presentation and then asked to discuss housing and community development needs, including fair housing issues and concerns. To facilitate this discussion, an interactive exercise was conducted to help residents prioritize limited resources.

Overall, meeting participants noted increasing needs among residents and the Southern California area at large at a time of increased unemployment and financial uncertainty. Below is a summary of housing-related issues identified during the public workshops.

Homelessness

Homelessness was one of the primary issues discussed by participants, especially at the Victorville meeting. Participants noted the need for a homeless center in the City. The high desert is subject to extreme temperatures that can result in dangerous conditions for homeless persons. Most homeless services are located “down the hill” in the City of San Bernardino or other southern jurisdictions.

Housing

Housing was another need discussed by participants at the meetings. Participants were primarily concerned about housing affordability and housing condition. Participants discussed the housing needs of seniors with limited income, and the condition of existing housing; certain participants were concerned about existing blighted/unmaintained rental apartments.

Neighborhoods

Participants stated the importance of crime-free, safe neighborhoods. Participants noted that if a community is safe and there are places for people to go (commercial and community-based), then residents will tend to remain in the community. The importance of maintaining a safe, well-maintained community was emphasized at the meetings.

B. Fair Housing Survey

The Fair Housing Survey sought to gain knowledge about the nature and extent of fair housing issues experienced by Apple Valley/Victorville residents. The survey consisted of ten questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in his/her neighborhood. A copy of the survey is included as part of Appendix A.

The survey was available in English and Spanish, and distributed via the following methods:

- Distributed at various community locations and public counters.
- Posted on the websites of both Apple Valley and Victorville.
- Solicited the participation of service providers to also post the survey link on their websites and to help distribute surveys to their clients.

Because the survey sample was not controlled, results of the survey are used only to provide insight regarding fair housing issues, but cannot be treated as a statistically valid survey.¹ Furthermore, fair housing is a complex issue; therefore, a survey of this nature can only explore the perception of housing discrimination but cannot be used as proofs of actual discrimination.

1. Who Responded to the Survey?

A total of 66 Apple Valley and Victorville residents responded to the Fair Housing Survey. The respondents were from ZIP Codes across both jurisdictions. A majority of survey recipients felt that housing discrimination was not an issue in their neighborhoods. Of the 66 responses, approximately 83 percent (55 persons) had not experienced housing discrimination. About 81 percent of the survey respondents (47 persons) stated they were homeowners.

2. Who Do You Believe Discriminated Against You?

Among the persons indicating that they had experienced housing discrimination, 46 percent (five persons) indicated that a landlord or property manager had discriminated against them, while 36 percent (four persons) of respondents identified a mortgage lender as the source of discrimination. Responses for the fair housing survey are not mutually exclusive; respondents had the option of listing multiple perpetrators of discrimination.

¹ A survey with a "controlled" sample would, through various techniques, "control" the socioeconomic characteristics of the respondents to ensure that the respondents are representative of the general population. This type of survey would provide results that are statistically valid but is much more costly to administer.

3. Where Did the Act of Discrimination Occur?

Among the persons indicating that they had experienced housing discrimination, 55 percent (six persons) indicated that the discrimination occurred in a single-family neighborhood. About 27 percent (three persons) indicated that the discrimination occurred in an apartment complex, and 18 percent (two persons) indicated that it took place when applying to a City/County program. Another 18 percent (two persons) indicated that the act of discrimination occurred at a public/subsidized housing project.

Location	Number	Percent
Apartment Complex	3	27.3%
When Applying to a City/County Program	2	18.2%
Single-Family Neighborhood	6	54.5%
Public/Subsidized Housing Project	2	18.2%
Condo Development	1	9.1%
A Trailer or Mobilehome Park	0	0.0%
Total	11	--

Notes:

1. Categories are not mutually exclusive
2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

4. On What Basis Do You Believe You Were Discriminated Against?

Of the 11 people who felt they were discriminated against, the most common causes for alleged discrimination were race, color, ancestry, and source of income.

Basis	Number	Percent
Race	3	27.3%
Source of Income	3	27.3%
Color	3	27.3%
Ancestry	3	27.3%
Other	2	18.2%
Disability	2	18.2%
Age	2	18.2%
Gender	2	18.2%
Family Status	2	18.2%
Marital Status	2	18.2%
National Origin	2	18.2%
Religion	1	9.1%
Sexual Orientation	0	0.0%
Total	11	--

Notes:

1. *Categories are not mutually exclusive*
2. *Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.*

5. Requests for Reasonable Accommodation

Among total survey respondents, six percent (three persons) indicated that they had been denied “reasonable accommodation” in rules, policies or practices for their disability. Generally, typical requests for “reasonable accommodation” include modifications for wheelchair use or the allowance of a service animal.

6. Why Did You Not Report the Incident?

Of the survey respondents who felt they were discriminated against, 29 percent reported the discrimination incident. Many of the respondents who did not report the incident indicated that they did not believe it would make a difference (50 percent or five persons). In addition, another 30 percent stated they did not know where to report the incident, 30 percent felt it was too much trouble, and 30 percent were afraid of retaliation.

Reason	Number	Percent
Don't believe it makes a difference	5	50.0%
Don't know where to report	3	30.0%
Too much trouble	3	30.0%
Afraid of Retaliation	3	30.0%
Total	10	--

Notes:

1. *Categories are not mutually exclusive*
2. *Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.*

7. What Was the Basis of the Hate Crime Against You?

Of all respondents completing the survey, 12 percent (seven persons) indicated that a hate crime had been committed in their neighborhood. Most of these respondents (60 percent) indicated that the hate crime committed was based on race. Other causes of the alleged hate crimes include religion, gender, sexual orientation, color, and disability.

C. Telephone Interviews

1. Agencies Interviewed

To supplement input from residents and agencies that attended the public meetings, telephone interviews were conducted. The following agencies responded to the interviews:

- Assistance League of Apple Valley
- High Desert Homeless Services
- Inland Fair Housing and Mediation Board
- Moses House Ministries
- Victor Valley Community Services Council

- Victor Valley Domestic Violence
- City of Victorville Code Enforcement and Demolition Programs
- City of Victorville After School Programs
- Legal Aid Society of San Bernardino
- San Bernardino Sexual Assault Services

2. Key Issues Identified

- Large families with children, particularly single mothers with children, usually have difficulty finding housing as many places do not want to rent to large families.
- Lack of adequate funding to expand fair housing services to address increased needs; fair housing outreach activities are limited due to budgetary constraints.
- Most frequent fair housing issues relate to reasonable accommodation and familial status.
- Landlords are not fully aware of their fair housing responsibilities and properties are not properly maintained. Seniors often get victimized and often do not get the needed repairs to their units.

D. Public Review Draft of AI

The Draft AI was made available for a 30-day public review from April 6, 2012 to May 6, 2012. Notices of availability of the document and/or public hearings were published in newspaper(s) of general circulation. Copies of these notices can be found in Appendix A.

Chapter 3: Community Profile

A key goal for fair housing programs is to foster an inclusive environment, one in which all people have the opportunity to live in decent and suitable homes and are treated equally in the rental, sale, or occupancy of housing. The community profile chapter provides background information on demographics, housing, employment, special needs groups, and other characteristics that describe the Town of Apple Valley and the City of Victorville. All of these factors can affect housing choice, housing opportunities, and the type of fair housing issues people in a community may encounter. This overview provides context for the discussion and evaluation of fair housing in the chapters that follow.

The Town of Apple Valley and City of Victorville are located in the Victor Valley area of San Bernardino County. This area, located near the southern edge of the Mojave Desert, is often referred to as the high desert. Both jurisdictions are conveniently located off Interstate 15, north of the San Bernardino Mountains, with Apple Valley located east of I-15 and Victorville spanning I-15 and located primarily to the west.

A. Demographic Profile

Examination of demographic characteristics can provide insight regarding the need and extent of equal access to housing in a community. Factors such as population growth, age characteristics, and race/ethnicity all help determine a community’s housing needs and provide considerations helpful to exploring potential impediments to fair housing choice.

1. Population and Population Growth

The Town of Apple Valley, incorporated in 1988, encompasses 78 square miles. The 2010 Census reported a population of 69,135 people in Apple Valley. The City of Victorville incorporated in 1962 and has grown to encompass over 74 square miles. The City’s 2010 population was 115,903 people. Both cities experienced extensive population growth in the 1980s and again between 2000 and 2010. Specifically, Victorville experienced tremendous growth (81 percent population growth) between 2000 and 2010, compared to both Apple Valley (27 percent) and San Bernardino County as a whole (19 percent).

Table 5: Population Growth (1980-2010)

	1980	1990	2000	2010	Percent Change 2000-2010
Apple Valley	14,305	46,079	54,239	69,135	27%
Victorville	14,220	40,674	64,029	115,903	81%
San Bernardino County	895,016	1,418,380	1,709,434	2,035,210	19%

Source: U.S. Census (1980, 1990, 2000, and 2010)

Population growth projections for the County of San Bernardino, Apple Valley, and Victorville anticipate a continued steady increase. The Southern California Association of Governments (SCAG) Regional Council adopts a growth forecast every four years; the most recent adopted

growth forecast is dated 2008. In 2008, SCAG projected that population growth would continue to be high in San Bernardino County through 2030. The overall percentage growth of San Bernardino County between 2010 and 2030 is projected to be around 45 percent. Growth in Victorville is anticipated to occur at roughly the same level, and Apple Valley is expected to experience slightly less growth (32 percent) over the next 20 years. However, these projections were made prior to the onset of the recession and therefore, may overstate the projected growth trends.

	2010	2020 Projected	2030 Projected	Percent Change 2010-2030 (projected)
Apple Valley	69,135	82,005	91,311	32%
Victorville	115,903	138,023	168,134	45%
San Bernardino County	2,035,210	2,582,765	2,957,753	45%

Source: U.S. Census 2010, SCAG 2008 Regional Transportation Plan Growth Forecast

2. Age Characteristics

Housing demand is affected by the age composition of a community since different age groups may have very different housing needs and face different fair housing issues. Young people may trend towards occupying apartments, condominiums, and small single-family homes due to household size and/or affordability. Middle-aged adults may trend towards desiring larger homes as incomes and family sizes increase, while seniors may prefer apartments, condominiums, mobile homes, or smaller single-family homes that have lower costs and less maintenance. Table 7 shows the age distribution of the population in Apple Valley and Victorville.

Age Group	Apple Valley				Victorville			
	2000		2010		2000		2010	
	# of Persons	% of Population	# of Persons	% of Population	# of Persons	% of Population	# of Persons	% of Population
Under 5	3,875	7.1%	4,795	6.9%	5,537	8.6%	10,289	8.9%
5 to 14	10,242	18.9%	10,535	15.2%	13,081	20.4%	21,067	18.2%
15 to 24	7,236	13.3%	10,470	15.1%	8,782	13.7%	18,803	16.2%
25 to 34	5,451	10.0%	7,383	10.7%	8,427	13.2%	17,343	15.0%
35 to 44	8,196	15.1%	7,685	11.1%	9,902	15.5%	16,136	13.9%
45 to 54	6,892	12.7%	9,498	13.7%	6,779	10.6%	13,873	12.0%
55 to 64	4,902	9.0%	8,104	11.7%	4,369	6.8%	8,980	7.7%
65 and over	7,445	13.7%	10,665	15.4%	7,152	11.2%	9,412	8.1%
Total	54,239	100.0%	69,135	100%	64,029	100.0%	115,903	100%

Source: U.S. Census 2000 and 2010

Apple Valley has a significant senior population, representing over 15 percent of the population. Victorville’s population is generally younger, with a higher percentage of children and young to middle-aged adults. The median age in a jurisdiction also reflects these age differences; the median age in Apple Valley is 37, while Victorville’s median age is 29.5. The median age of San Bernardino County at large is 31.7 years. Apple Valley’s population continued to age between 2000 and 2010, with an increasing percentage of the population made up by seniors. In Victorville, the proportion of seniors in the population decreased while young adults (15-34) increased as a percentage of population over the last decade.

Telephone interviews conducted with service agencies as part of this AI indicate that large families with children and seniors may face housing discrimination in the rental housing market.

3. Race and Ethnicity

Both the Town of Apple Valley and the City of Victorville have increased in population and in diversity over the past 20 years, as indicated in Table 8. These trends are similar to those of other communities throughout California. Race and ethnicity can have implications for housing choice, as certain demographic and economic variables correlate with race. From 2000 to 2010, the overall percentage of White persons in both communities declined, continuing the trends from the 1990s, while the percentage of Hispanic persons increased.

Race/Ethnicity	Apple Valley				Victorville			
	2000	Percent of Total	2010	Percent of Total	2000	Percent of Total	2010	Percent of Total
White	36,710	68%	47,762	69%	30,382	47%	56,258	49%
Black	4,141	8%	6,351	9%	7,431	12%	19,483	17%
Native American	357	1%	779	1%	380	1%	1,665	1%
Asian/Pacific Islander	1,268	2%	2,314	3%	2,202	3%	5,130	4%
Other ¹	148	0%	11,959	17%	143	0%	33,367	29%
Hispanic	10,067	19%	20,156	29%	21,426	33%	55,359	48%

Source: U.S. Census 2000 and 2010.

Note 1: A large number of residents in both jurisdictions identified as “Other” race. The Census Bureau included the "some other race" category for responses that could not be classified in any of the other race categories on the questionnaire. The vast majority of people, nationwide, who reported only as "some other race" were of Hispanic or Latino origin. Data on Hispanics or Latinos, who may be of any race, were obtained from a separate question on ethnicity.

Estimates from the U.S. Department of Housing and Urban Development (HUD), based on Urban Land Institute research, indicate that while discrimination persists against Blacks and Hispanics searching for homes in major metropolitan areas, its incidence had generally declined since 1989.² However, as noted in the Urban Land Institute report, when Blacks and Hispanics visit real estate or rental offices to inquire about the availability of advertised homes and apartments, they continue to face a significant risk of receiving less information and less

² *Discrimination in Metropolitan Housing Markets: National Results from Phase I of HDS 2000 Annexes, Urban Land Institute 2002.*

favorable treatment compared to White customers. This discrimination can raise the cost of housing searches for Blacks and Hispanics, create barriers to homeownership and housing choice, and perpetuate involuntary racial and ethnic segregation.

According to fair housing statistics compiled by the Inland Fair Housing and Mediation Board, race discrimination is still one of the top fair housing complaints in Apple Valley and Victorville.

Residential Segregation

Historically, some researchers have evaluated the degree of racial and ethnic integration as an important measure or evidence of fair housing opportunity. Whereas the separation of different race and ethnic groups has historically been associated with segregation, people’s choice of residence today is complex. Housing prices, local schools, access to transportation, and proximity to jobs are all important factors guiding people’s housing choices, among other factors.

Statistical techniques can be used to measure the degree of segregation experienced by different racial/ethnic groups, such as the dissimilarity index. The dissimilarity index (Table 9) represents the percentage of one group that would have to move into a new neighborhood to achieve perfect integration with another group. An index score can range in value from zero, indicating complete integration, to 100, indicating complete segregation. An index value of 60 or above is considered very high, an index value of 40 to 50 is usually considered to be a moderate level of segregation, and values of 30 or below are considered to be fairly low.

The dissimilarity index shows fairly low levels of racial segregation in both communities. However, generally, Asians are slightly more segregated in both communities.

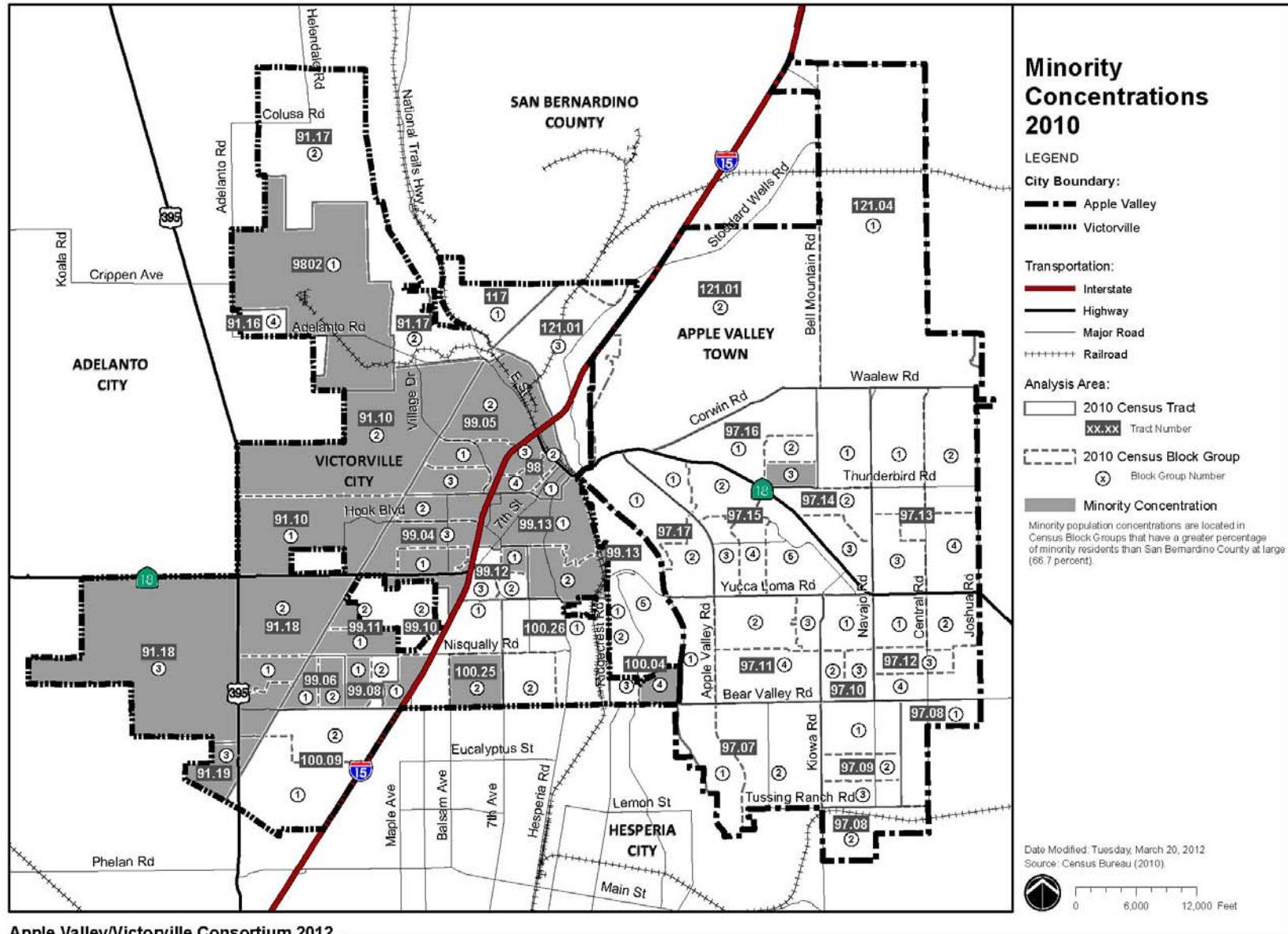
Table 9: Racial Integration (2010)					
Race/Ethnic Group	Percent of Total Population	Dissimilarity Index with Whites	Dissimilarity Index with Hispanics	Dissimilarity Index with Blacks	Dissimilarity Index with Asians
Apple Valley					
White	69%	--	0.200	0.244	0.212
Hispanic	29%	0.200	--	0.178	0.338
Black	9%	0.244	0.178	--	0.310
Asian	3%	0.212	0.338	0.310	--
Victorville					
White	49%	--	0.141	0.190	0.177
Hispanic	48%	0.141	--	0.144	0.180
Black	17%	0.190	0.144	--	0.197
Asian	4%	0.177	0.180	0.197	--

Sources: U.S. Census 2010; Veronica Tam and Associates

Areas of Minority Concentration

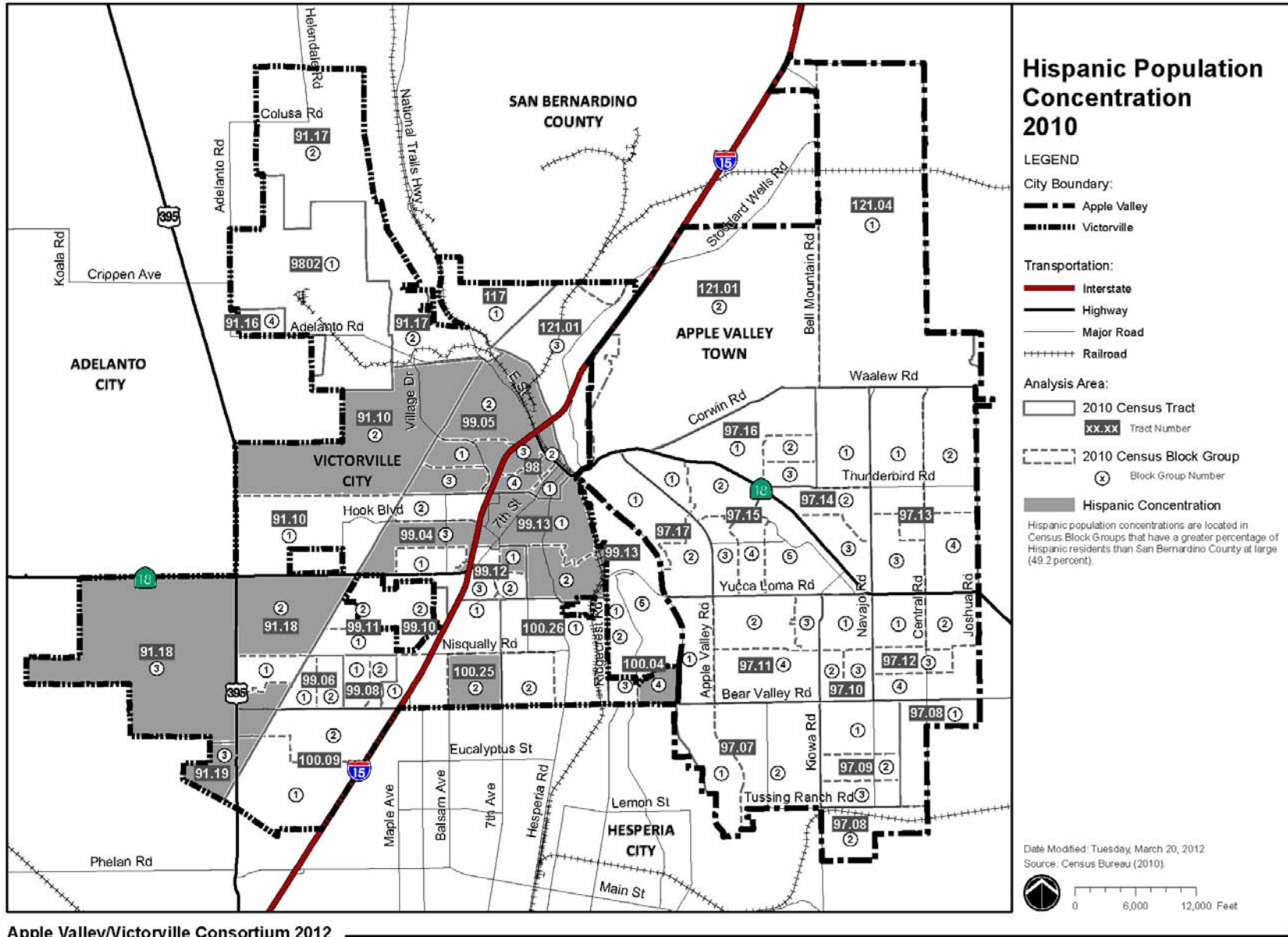
Areas with concentrations of minority residents may have different needs. A concentration is defined as a Census block group with a proportion of a particular race/ethnic group greater than that of the countywide average for that group. Figure 1 through Figure 4 illustrate the concentrations of minorities, as well as Black, Hispanic, and Asian populations, in the Consortium area. Apple Valley does not have any Census block groups with concentrations of Hispanic persons, but does have concentrations of both Blacks and Asians. Victorville has one (northern) Census block group with an Asian population concentration.

Figure 1: Minority Concentrations (2010)



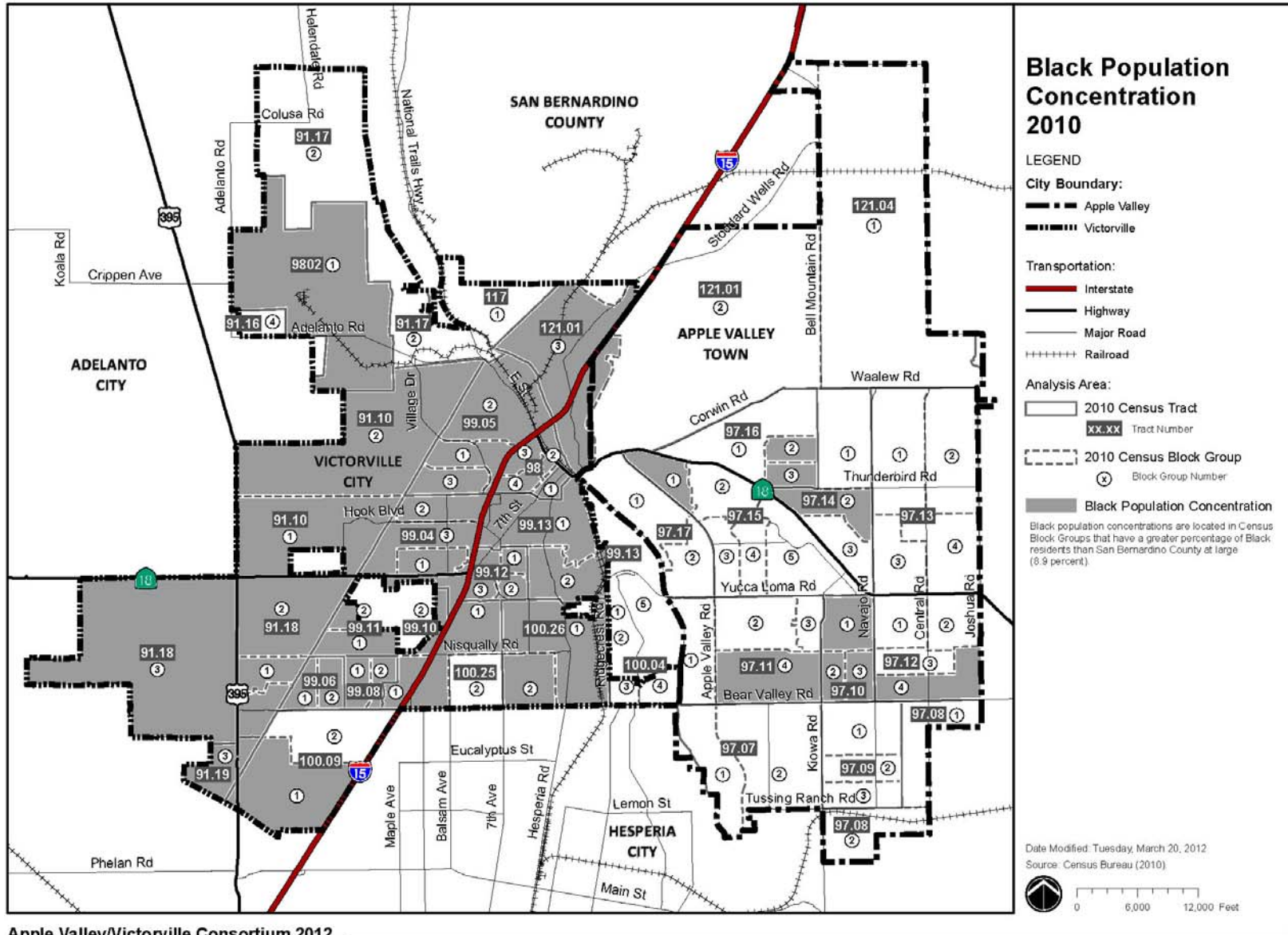
Apple Valley/Victorville Consortium 2012

Figure 2: Hispanic Concentration (2010)



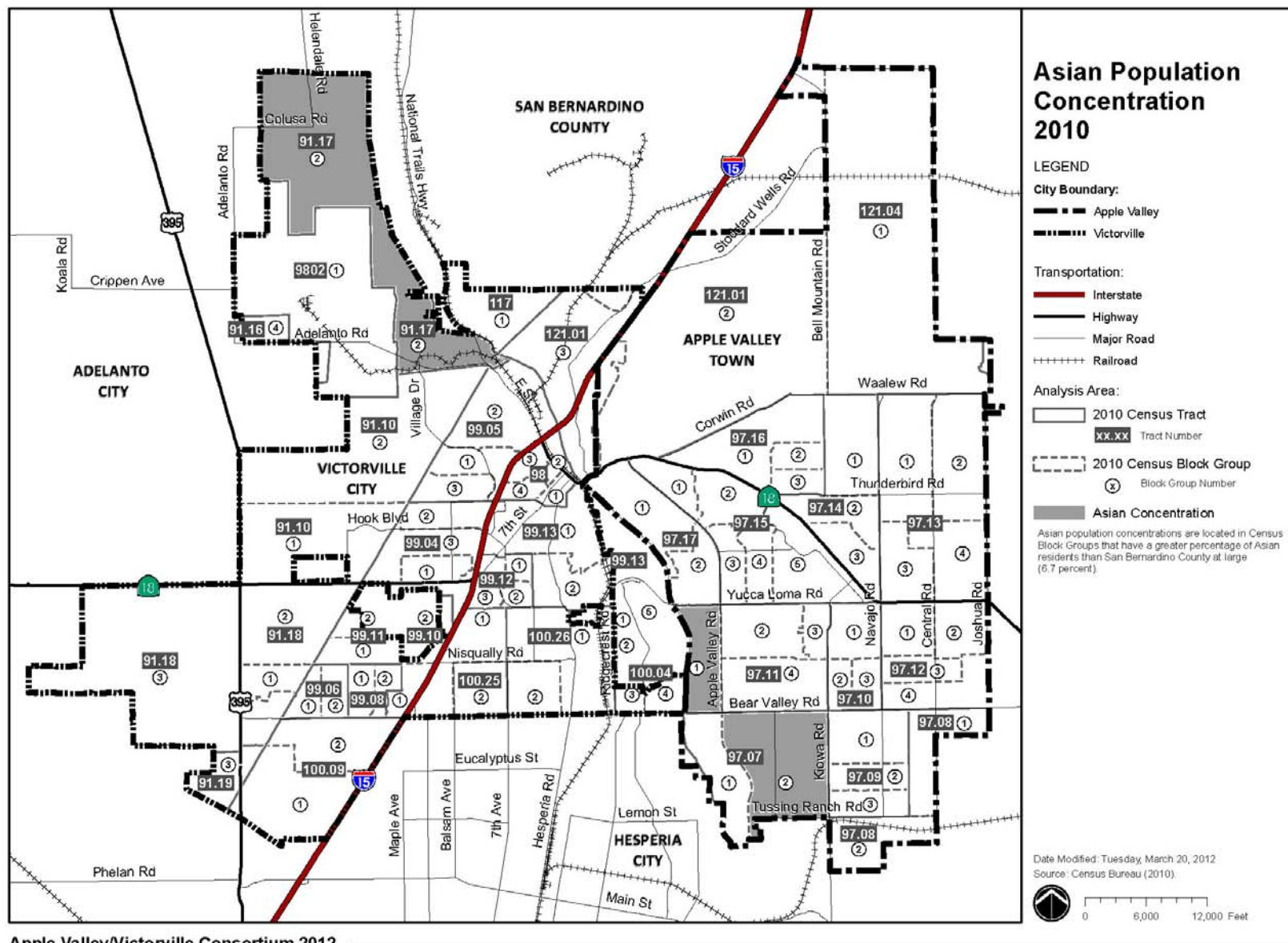
Apple Valley/Victorville Consortium 2012

Figure 3: Black Concentration (2010)



Apple Valley/Victorville Consortium 2012

Figure 4: Asian Concentration (2010)



Apple Valley/Victorville Consortium 2012

4. Foreign Born and Linguistic Isolation

According to the 2006-2010 ACS³ estimates, approximately 10.6 percent of Apple Valley residents and 18.1 percent of Victorville residents were foreign born; these percentages are lower than San Bernardino County at large, where 22.8 percent of residents are estimated to be foreign-born.

A linguistically isolated household can be described as a household whose members have some difficulty with English. The ACS provides information on households with populations five years and over who speak English “less than very well.” In Apple Valley, the 6.3 percent of residents who spoke English “less than very well” can therefore be considered linguistically isolated. In Victorville, the percentage of linguistically isolated population is higher, representing an estimated 13.3 percent of the population. In general, linguistic isolation is less prevalent in Apple Valley and Victorville than in the County, which has 18 percent of the population considered to be linguistically isolated. The language most commonly spoken by residents who speak English “less than very well” was Spanish.

Language barriers may prevent residents from accessing services, information, and housing, and may also affect educational attainment and employment. Executive Order 13166 (“Improving Access to Services by Persons with Limited English Proficiency”) was issued in August 2000, which requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to Limited English Proficiency (LEP), cannot fully and equally participate in or benefit from those programs and activities. This requirement passes down to grantees of federal funds as well; therefore, the Town of Apple Valley and City of Victorville are responsible for ensuring compliance with this regulation for both jurisdictions and their sub-recipients. Currently, public notices, flyers, posters, surveys, and program applications are available in English and Spanish to ensure equal access to LEP persons for the planning and program implementation of the Consortium’s CDBG and HOME programs. In addition, upon request, translators are available at all public meetings and for questions pertaining to draft and final documents such as the Consolidated Plan, Annual Action Plan, CAPER, Analysis of Impediments to Fair Housing Choice. The majority of the public service agencies funded each year also provide Spanish translation and are monitored for compliance.

B. Income Profile

Household income is the most important factor determining a household’s ability to balance housing costs with other basic life necessities. A stable income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population.

³ *The 2010 Census contains only limited data about the population. The Census has instituted a new method of providing updates to socioeconomic data regarding the population using the American Community Survey. ACS is a limited sample of the population but is conducted more frequently than the Census. Sample data are averaged over a period of time.*

Households with lower incomes are limited in their ability to balance housing costs with other needs and often the ability to find housing of adequate size. While economic factors that affect a household’s housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

1. Median Household Income

According to the 2006-2010 American Community Survey (ACS), San Bernardino County households had a median income of \$55,845. Table 10 shows the median household income for Apple Valley and Victorville provided by the 2000 Census and the 2006-2010 ACS. The median household income reported in the 2000 Census for the Town of Apple Valley was higher than that of surrounding cities, but slightly lower than countywide median. Victorville’s median income reported in the 2000 Census was lower than Apple Valley, the County, and most surrounding cities. Both jurisdictions experienced increases in median income between 2000 and 2010, with Victorville’s median income increasing dramatically (48 percent). In 2010, median incomes in Apple Valley (\$50,066) and Victorville (\$53,566) median incomes remained below the County at large (\$55,845); however, they were somewhat higher than most surrounding jurisdictions, with the exception of Yucaipa.

Jurisdiction	Median Household Income		% Change
	2000	2006-2010	
Apple Valley	\$40,421	\$50,066	23.9%
Victorville	\$36,187	\$53,566	48.0%
Adelanto	\$31,594	\$43,305	37.1%
Barstow	\$35,069	\$45,166	28.8%
Hesperia	\$40,201	\$48,386	20.4%
Yucaipa	\$39,144	\$57,492	46.9%
San Bernardino County	\$42,066	\$55,845	32.8%

Sources: U.S. Census 2000 and American Community Survey 2006-2010 Five-Year Estimates

2. Income Distribution

For purposes of housing and community development resource programming, HUD has established income definitions based on the Area Median Income (AMI) for a given Metropolitan Statistical Area (MSA). These income definitions are presented in Table 11.

Income Group	% of Area Median Income
Extremely Low Income	0-30%
Low Income	31-50%
Moderate income	51-80%
Middle/Upper Income	>81%

HUD periodically receives "custom tabulations" of Census data from the U.S. Census Bureau that are largely not available through standard Census products. The most recent estimates are derived from the 2006-2008 ACS Three-Year Estimates. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS cross-tabulates the Census data to reveal household income in a community in relation to the AMI. As defined by CHAS, housing problems include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; and
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

Combined, extremely low- and low income-households are referred as lower-income households. Virtually all federal programs provide assistance only to households in the lower- and moderate-income categories.

According to the CHAS data, 31 percent of Apple Valley households were within the extremely low-income (30 percent AMI) and low-income (50 percent AMI) categories, and 16 percent were within the moderate-income (80 percent AMI) category. In Victorville, 27 percent of all households were considered extremely low income (30 percent AMI) and low income (50 percent AMI), and 19 percent were within the moderate-income (80 percent AMI) category.

Household income often varies by household type. As shown, in Table 12, elderly households had the highest proportion of extremely low-income households, at 19 percent. In addition, 59 percent of elderly households earned less than 80 percent of the AMI, largely due to the predominance of fixed incomes among the elderly.

Table 12: Housing Assistance Needs of Low and Moderate Income Households (2006-2008)

Household by Type, Income, and Housing Problem	Renters				Owners			Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Large Family	Total Owners	
Extremely Low Income (0-30% AMI) Apple Valley	360	1,190	465	2,500	535	75	1,140	3,640
# with housing problems	295	1,085	465	2,010	485	75	880	2,890
% with housing problems	82%	91%	100%	80%	91%	100%	77%	79%
Extremely Low Income (0-30% AMI) Victorville	355	1,280	700	2,990	420	140	1,240	4,230
# with housing problems	295	1,095	690	2,515	235	140	830	3,345
% with housing problems	83%	86%	99%	84%	56%	100%	67%	79%
Low Income (31-50% AMI) Apple Valley	230	500	430	1,330	1,225	295	2,100	3,430
# with housing problems	120	500	405	1,225	615	295	1,440	2,665
% with housing problems	52%	100%	94%	92%	50%	100%	69%	78%
Low Income (31-50% AMI) Victorville	250	1,110	645	2,290	705	255	1,505	3,795
# with housing problems	200	1,110	645	2,140	255	155	855	2,995
% with housing problems	80%	100%	100%	93%	36%	61%	63%	79%
Moderate Income (51-80% AMI) Apple Valley	275	600	155	1,160	1,070	365	2,570	3,730
# with housing problems	210	405	135	785	470	300	1,630	2,415
% with housing problems	76%	68%	87%	68%	44%	82%	63%	65%
Moderate Income (51-80% AMI) Victorville	120	1,100	405	2,130	980	915	3,465	5,595
# with housing problems	100	780	315	1,510	385	660	2,190	3,700
% with housing problems	83%	71%	78%	71%	39%	72%	46%	66%
Total Households Apple Valley	1,025	3,280	1,320	7,180	5,155	1,775	15,745	22,925
# with housing problems	660	2,010	1,130	4,290	2,105	1,230	7,020	11,310
% with housing problems	64%	61%	86%	60%	41%	69%	45%	49%
Total Households Victorville	980	4,850	2,410	10,520	4,045	4,320	19,580	30,100
# with housing problems	635	3,165	1,725	6,565	1,335	2,450	8,930	15,495
% with housing problems	65%	65%	72%	62%	33%	57%	46%	51%

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey 2006-2008 Estimates.

3. Households by Income and Race/Ethnicity

Table 13 illustrates median income reported by the 2006-2010 ACS by race/ethnicity. In the Town of Apple Valley, Asians had a considerably higher median income than all other races. However, Asians represented only a small portion of the population (see Table 8: Racial and Ethnic Composition). On the other hand, the second largest racial/ethnic group in the Town, Hispanics, made almost \$15,000 less than the overall median in Apple Valley. Blacks were estimated to have a median income approximately \$10,000 lower than the median for the Town as a whole. Native Americans in Apple Valley were estimated to have the lowest median household income, although the population is very small and the margin of error on the estimate is proportionally higher.

Race/Ethnicity	Apple Valley	Victorville	San Bernardino County
White	\$54,210	\$56,952	\$60,632
Black	\$44,043	\$41,466	\$48,143
Hispanic or Latino	\$39,892	\$53,816	\$51,479
Asian	\$86,464	\$49,688	\$77,413
Native American	\$12,356	\$34,716	\$44,624
Native Hawaiian/Pacific Islander	-	\$98,188	\$62,941
Median Income All	\$40,683	\$57,163	\$50,931

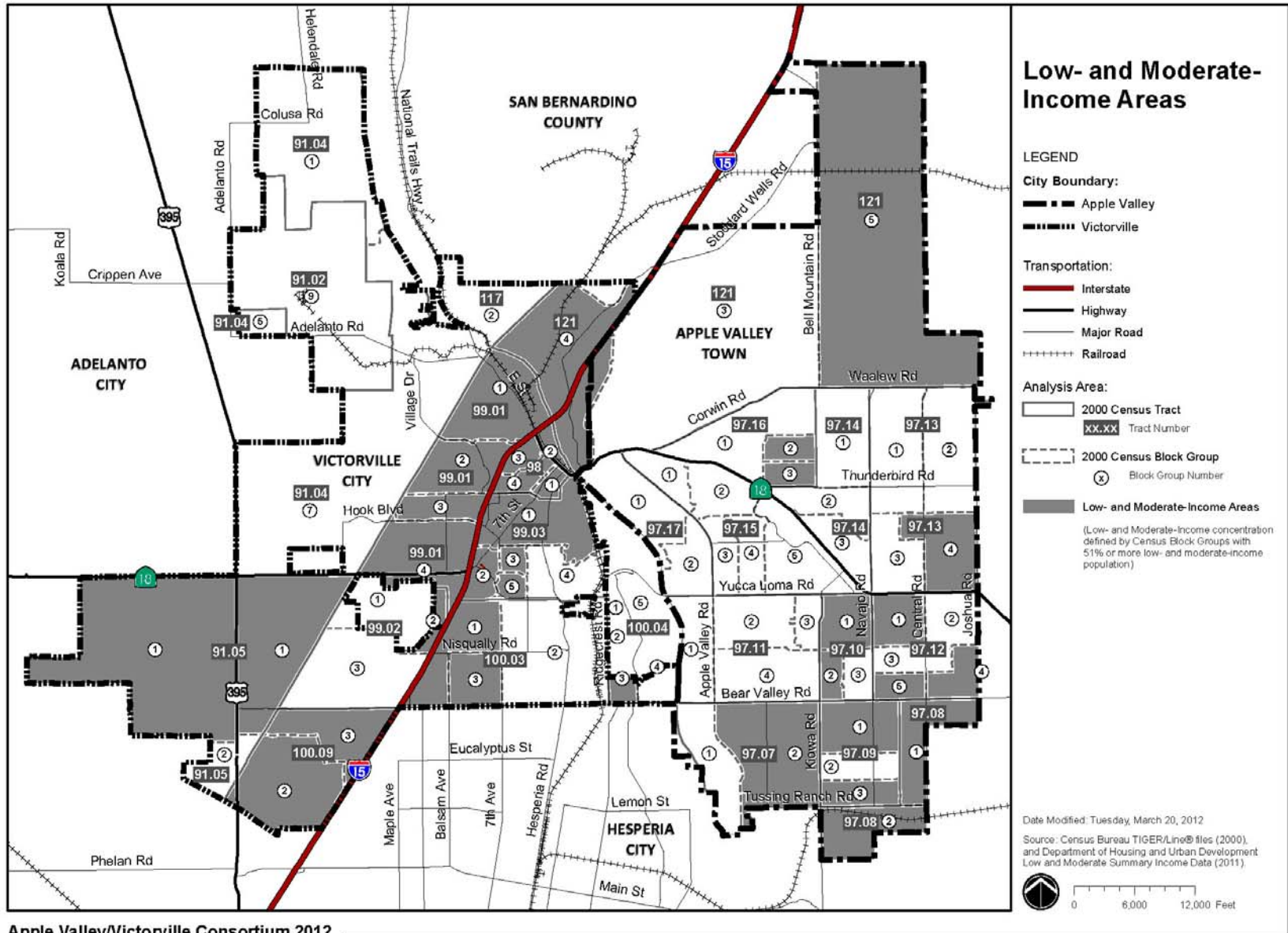
Source: 2006-2010 American Community Survey Five-Year Estimates

In Victorville, the income disparities are not as prevalent for Hispanic households, which earn approximately \$3,000 less than the median income in the City. Blacks and Native Americans earned significantly less; median income for Blacks was estimated at \$15,000 less than the median income, and Native Americans were estimated to earn over \$22,000 less than the median income compared to the median income in Victorville across all races. Asians earned slightly less than the median income here, but Native Hawaiians/Pacific Islanders were estimated to earn substantially more. Again, due to the limited size of the population, the margin of error on this estimate is proportionally higher.

4. Concentrations of Low and Moderate Income Populations

Figure 5 identifies the low- and moderate-income areas in the Consortium area by Census block group. A low- and moderate-income area is defined as a Census block group with 51 percent or more low- and moderate-income persons. As shown in the figure, concentrations of low- and moderate-income residents are located throughout the Consortium area, with more concentrations generally located near I-15 in Victorville and the southern parts of Apple Valley. In Apple Valley, the one Census block group with an overall minority concentration (as depicted in Figure 1) is also identified as a low- and moderate-income area in Figure 5. In Victorville, many of the minority concentration areas identified in Figure 1 are also low- and moderate-income areas.

Figure 5: Low and Moderate Income Areas (2000)



Apple Valley/Victorville Consortium 2012

5. Major Employers

According to the Town of Apple Valley, education, health services, and retail are among the top employers in the Town. In Victorville, top employers include businesses associated with education, and health services. Figure 10 on page 98 illustrates transportation access to major employers in Apple Valley and Victorville. Nearly all of the City's major employers are also located directly on or adjacent to public transit routes.

Apple Valley		Victorville	
Employer	Employees	Employer	Employees
St Mary's Medical Center	1,651	Desert Valley Medical Center	1,500
Apple Valley Unified School Districts	1,575	Victor Valley College	770
Wal-Mart Distribution Center	750	Victor Valley Community Hospital	475
Target Stores	344	Victorville City Hall	400
High Desert Law and Justice Center	250	Walmart	400
Stater Bros	241	El Mojave	300
Wal-Mart Store	232	Desert Community Bank	243
Town of Apple Valley	170	Lowe's Home Improvement	201
Winco Foods	149	Daily Press	200
Apple Valley Christian Care	147	Desert Knolls Convalescent	200

Sources: Town of Apple Valley and InfoUSA, 2012.

6. Unemployment

With a struggling economy nationwide, job loss has been prevalent. Without an income to support housing and living expenses, homeless and rates unemployment rates are high. According to the California Employment Development Department, the unemployment rate in December 2011 was 13.1 percent in Apple Valley and 14.4 percent in Victorville. This is higher than the County as a whole (11.9 percent), despite Victorville's redevelopment of the former George Air Force Base into the Southern California Logistics Airport and expansions in retail enterprises in both communities in the late 2000s.

C. Household Profile

The household profile, which outlines characteristics of the Apple Valley/Victorville Consortium households, aids in understanding housing needs. Households with different characteristics have unique housing needs and may face different impediments in the housing market. Various household characteristics may affect equal access to housing, including household type, size, and income level. A household, as defined by the U.S. Census Bureau, includes all the persons who occupy a housing unit, which may include a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

1. Household Composition and Size

The number of households in Apple Valley and Victorville increased between 2000 and 2010; Apple Valley households increased 17 percent, from 20,161 to 22,566 households, and Victorville households increased dramatically—44 percent—from 22,656 to 32,558 households in 2010. As shown in Table 15, the majority of households in Apple Valley and Victorville are families (75 percent and 80 percent, respectively). Approximately 20 percent of all families are female-headed households with children, slightly lower than the County average of 22 percent. The average household size in the Town of Apple Valley is estimated to have remained stable since the 2000 Census at 2.91 persons. In Victorville, the size increased from 3.03 persons per household in 2000 to 3.4 persons per household in 2010.

Among all households, approximately 32 percent included at least one or more elderly persons in Apple Valley, while only 21 percent of households in Victorville included an elderly person. Victorville’s proportion of elderly persons within households is similar to that of the County as a whole.

Table 15: Household Type and Size

	Average Household Size	Percent of Households with Elderly	Percent Families	Average Family Size	Percent of Families with Children	Percent of Families w/ Female-Headed Households w/ Children
Apple Valley	2.91	32%	75%	3.32	44%	20%
Victorville	3.4	21%	80%	3.77	58%	20%
San Bernardino County	3.26	22%	77%	3.68	52%	22%

Source: U.S. Census 2010

D. Special Needs Populations

Certain households, because of their special characteristics and needs, may require special accommodations and may have difficulty finding housing due to special needs. Special needs groups may include the elderly, persons with disabilities, persons with HIV/AIDS, female-headed households, large households, and homeless persons and persons at-risk of homelessness.

1. Elderly and Frail Elderly

The population over 65 years of age is considered elderly. Elderly households are vulnerable to housing problems and housing discrimination due to limited income, prevalence of physical or mental disabilities, limited mobility, and high health care costs. The elderly, and particularly those with disabilities, may face increased difficulty in finding housing accommodations, and may become victims of housing discrimination or fraud.

According to the 2010 Census, Apple Valley is home to 10,665 elderly persons, representing over 15 percent of all residents. According to CHAS data, 26 percent of all households included

an elderly person. Almost 60 percent of elderly households had low and moderate incomes. Approximately 36 percent of all elderly households experienced housing problems such as cost burden or substandard housing. Housing problems were significantly more prevalent for elderly renter-households than elderly owner-households (64 percent compared to 41 percent).

In Victorville, the elderly population totals 9,412 persons, representing eight percent of residents; 17 percent of all households included an elderly person. Almost 56 percent of elderly households had low and moderate incomes. Approximately 29 percent of all elderly households experienced housing problems such as cost burden or substandard housing. Housing problems were significantly more prevalent for elderly renter-households than elderly owner-households (65 percent compared to 33 percent).

Frail elderly persons are those with a disability that hinders their mobility or prevents them from caring for themselves. According to the 2008-2010 ACS Three-Year Estimates, approximately 36.6 percent of elderly in Apple Valley and 37 percent of elderly in Victorville are frail elderly with disabilities.

Telephone interviews conducted as part of the AI indicate that there is an increase in elderly persons being discriminated by landlords, especially in not receiving the needed repairs to their units.

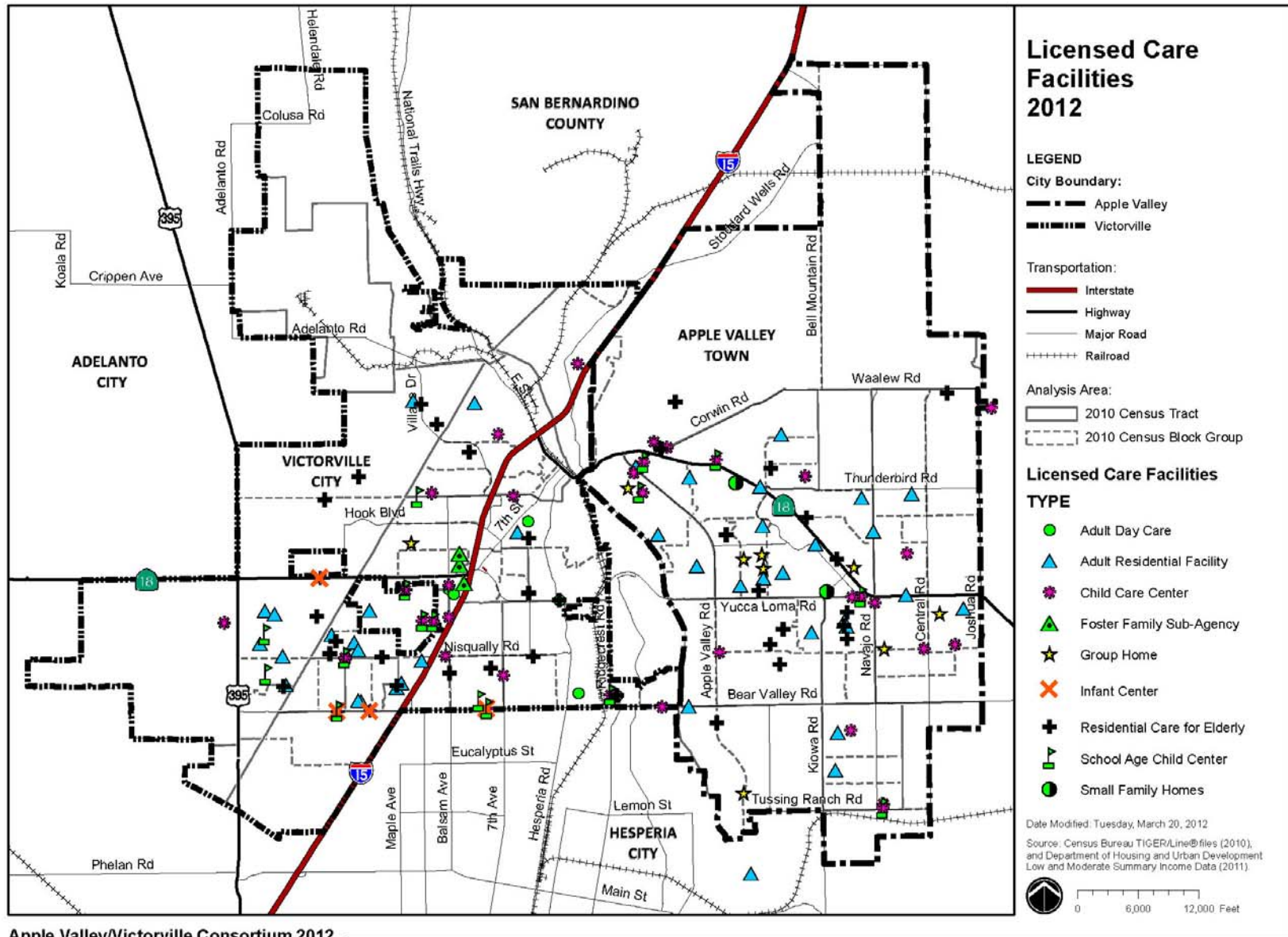
Table 16: Elderly Profile				
	% of Population¹	Population With a Disability²	Low/Moderate Income Households³	Households with Housing Problems³
Apple Valley				
Elderly	26%	37%	60%	36%
All Households	100%	14%	47%	49%
Victorville				
Elderly	17%	37%	56%	29%
All Households	100%	11%	45%	51%

Sources: 1) U.S. Census Bureau, 2010 Census; 2) 2008-2010 American Community Survey; 3) HUD CHAS, 2006-2008

The housing needs of the elderly include supportive housing, such as intermediate care facilities, group homes, and other housing that may include a planned service component. Needed services related to elderly households include: personal care, health care, housekeeping, meal preparation, personal emergency response, and transportation. According to the California Department of Social Services, Community Care Licensing Division, there are 34 residential care facilities for the elderly and nine adult day care centers located in Apple Valley and Victorville. The adult day care facilities have a capacity to serve 450 elderly persons, and the residential care facilities have the capacity to serve 672 elderly persons.

Figure 6 illustrates the location of the various licensed care facilities in Apple Valley and Victorville. The central portions of both jurisdictions are well served by various types of community care facilities; however, there is a noticeable absence of facilities in the northern areas of Apple Valley (above Corwin and Waalew Roads) and Victorville (above Adelanto Road).

Figure 6: Licensed Care Facilities



2. Persons with Disabilities

The Americans with Disabilities Act (ADA) defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the use of wheelchairs, need for home modifications to improve accessibility, or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords often refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities. While housing discrimination is not covered by the ADA, the Fair Housing Act prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS.

According to the 2008-2010 ACS, 14 percent of the Apple Valley population and 11 percent of the Victorville population have one or more disabilities. Special housing needs for persons with disabilities fall into two general categories: physical design to address mobility impairments and in-home social, educational, and medical support to address developmental and mental impairments. The ACS provides information on persons with an independent living difficulty; estimates indicate that seven percent of Apple Valley residents and six percent of Victorville residents have an independent living difficulty. According to the 2005-2007 ACS⁴, an estimated 4,329 persons (10.3 percent) over age 16 in Apple Valley and 6,384 persons (10.6 percent) over age 16 in Victorville had physical disabilities.

Oftentimes, disabilities present an employment obstacle, making it difficult for the disabled to earn adequate incomes. In Apple Valley and Victorville, only about 30 percent of disabled persons were employed, according to ACS 2007-2009 estimates. Since over two-thirds of the disabled population relied on fixed monthly disability incomes that are rarely sufficient to pay market rate rents, supportive housing options, including group housing and shared housing, are important means for meeting the needs of persons with disabilities. Such housing options typically include supportive services onsite to also meet the social needs of persons with disabilities. According to the State Community Care Licensing Division, there are 46 residential care facilities for adults and 34 residential care facilities for the elderly in the Consortium area, for a total of 80 residential care facilities with a combined capacity of 942 persons.

The location of housing and availability of transportation is also important because disabled people may require access to a variety of social and specialized services. Amendments to the Fair Housing Act, as well as state law, require ground-floor units of new multi-family construction with more than four units to be accessible to persons with disabilities. However, units built prior to 1989 are not required to be accessible to persons with disabilities. Older units, particularly in older multi-family structures, are very expensive to retrofit for disabled occupants because space is rarely available for elevator shafts, ramps, or widened doorways, etc. The site, parking areas, and walkways may also need modifications to install ramps and widen walkways and gates.

⁴ *Five-Year Estimates and Three-Year Estimates from 2008-2010 regarding physical disabilities are unavailable at this time.*

Affordability, design, location, and discrimination significantly limit the supply of housing available to persons with disabilities. Most homes are inaccessible to people with mobility and sensory limitations. There is a need for housing with widened doorways and hallways, access ramps, larger bedrooms, lowered countertops, and other features necessary for accessibility. Location of housing is also a factor, as many persons with disabilities often rely on public transportation.

Housing and advocacy groups report that people with disabilities are often victims of discrimination in the home-buying market. The Inland Fair Housing Mediation Board notes that the most common fair housing complaint in the San Bernardino region today pertains to disabilities. People with disabilities, whether they work or receive disability income, are often perceived to be a greater financial risk than persons without disabilities with similar incomes.

3. Persons with HIV/AIDS

For persons living with HIV/AIDS, access to safe, affordable housing is nearly as important to their general health and well-being as access to quality health care. For many persons with HIV/AIDS, the persistent shortage of stable housing can be the primary barrier to consistent medical care and treatment. Persons with HIV/AIDS also require a broad range of services, including counseling, medical care, in-home care, transportation, and food, in addition to stable housing. Today, persons with HIV/AIDS live longer and require longer provision of services and housing. Stable housing promotes improved health, sobriety, decreased drug abuse, and a return to paid employment and productive social activities resulting in an improved quality of life. Furthermore, stable housing is shown to be cost-effective for the community in that it helps to decrease risk factors that can lead to HIV and AIDS transmission.

Persons with HIV/AIDS face an array of barriers to obtaining and maintaining safe, affordable housing. For persons living with HIV/AIDS, access to safe, affordable housing can be as important to their general health and well-being as access to quality health care. Stigmatism associated with their illness and possible sexual orientation can add to the difficulty of obtaining and maintaining housing. Persons with HIV/AIDS can also require a broad range of services, including counseling, medical care, in-home care, transportation assistance, and food provision.

According to the San Bernardino County Department of Public Health, a total of 1,574 HIV cases 4,243 cases of AIDS⁵ have been reported in San Bernardino County as of December 31, 2011. As of that same date, there were 1,468 cases of people living with HIV and 2,021 cases of people living with AIDS in San Bernardino County. National studies have shown that at least 25 percent of people with disabling AIDS will be in need of supportive housing at some time during their illness.

In Apple Valley and Victorville, 262 AIDS cases and 115 HIV cases have been reported to date. Over 79 percent of the cases of HIV and AIDS reported in Apple Valley and Victorville were men. Of the total HIV/AIDS population in the Consortium, 44 percent were White, 29 percent

⁵ AIDS reporting began in March 1983. HIV reporting began in 2002 by code and by name in April 2006.

were Black, 25 percent were Hispanic (all races), and the remaining two percent were Asian/Pacific Islander, American Indian/Alaskan Native, or Other/Multi-Race.

Table 17: Victorville and Apple Valley HIV/AIDS Statistics through 2011			
	Apple Valley	Victorville	Total
Total HIV cases reported to date ¹	44	71	115
Surviving	37	67	104
Total AIDS cases reported to date ²	110	152	262
Surviving	55	74	129
Gender HIV/AIDS			
Male	124	175	299
Female	30	48	78
Race/Ethnicity HIV/AIDS			
Hispanic/Latino	33	63	96
African American/Black	32	76	108
White	85	81	166
Asian/Pacific Islander	<5	<5	<10
American Indian/Alaskan Native	<5	<5	<10
Other/Multi-Race	<5	<5	<10

Note 1: HIV has been reportable in California by code since 2002 and by name since 2006.

Note 2: AIDS has been reportable in California since 1983.

Source: HIV Prevention and Care, Department of Public Health, San Bernardino County

4. Families with Children

Families with children often face housing discrimination by landlords who fear that children will cause property damage. Some landlords may also have cultural biases against children of opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. According to the 2010 Census, approximately 33 percent of all households in Apple Valley and 46 percent of all households in Victorville have children under the age of 18. Approximately 15 percent of total households in Apple Valley and 20 percent of households in Victorville are female-headed households with children.

5. Single-parents Single Parents and Female-Headed Households

In 2010, Apple Valley had approximately 2,789 single-parent households and Victorville 5,377 single-parent households. Of the single-parent households in Apple Valley, 71 percent were headed by women (approximately 11 percent of all family households in the Town) and 29 percent were headed by males (representing five percent of all family households in the Town). In Victorville, of the single-parent households, 75 percent were headed by women (approximately 15 percent of all family households in the City), and 25 percent were headed by males (only five percent of all family households in the City).

Female single-parent family households comprised a disproportionate number of families living in poverty. According to the 2006-2010 ACS Five-Year Estimates, female single-parent family

households made up 38.5 percent of families in Apple Valley living below the poverty level (compared to 13.6 percent of all family households in the Town). In Victorville, female single-parent family households made up 39.4 percent of families in Victorville living below the poverty level (compared to 16.3 percent of all family households in the City.)

Fair housing statistics compiled by the Inland Fair Housing and Mediation Board indicate that housing discrimination based on familial status is among the most frequent types of fair housing complaints. Nonprofit service providers also commented that large families, particularly single-parents with children, often face discrimination in the rental housing market.

6. Large Households

Large households, defined as those with five or more persons, often face discrimination in the housing market, particularly for rental housing. Property owners and managers may be concerned with the potential increase in wear and tear and liability issues related to large households, especially those with children.

According to 2006-2008 CHAS data, 14 percent of all households in Apple Valley and 22 percent of all households in Victorville have five or more members. Of those, the majority lived in owner-occupied housing units. In Apple Valley, 58 percent of large households had low and moderate incomes; 45 percent of large households in Victorville had low and moderate incomes. Large families in both jurisdictions experienced a much higher rate of housing problems (including overcrowding, cost burden, or substandard housing conditions) compared to all households (Table 18).

Table 18: Profile of Large Households			
	Percent of All Households	Percent Low- and Moderate-Income	Housing Problems
Apple Valley			
Large Households	14%	58%	76%
All Households	100%	47%	49%
Victorville			
Large Households	22%	45%	62%
All Households	100%	45%	51%

Sources: HUD CHAS Data; American Community Survey 2006-2008 Estimates.

The 2006-2010 ACS estimates that Apple Valley had 17,859 housing units with three or more bedrooms (85 percent of the owner-occupied units; 45 percent of the renter-occupied units), Victorville had 26,764 housing units with three or more bedrooms (91 percent of the owner-occupied; 56 percent of the renter-occupied). A sufficient number of large homes exist to accommodate the large households. However, most of the large units are owner-occupied. The general lack of large rental units compared to demand may impact affordability.

7. Homeless Population

Homeless persons often have a very difficult time finding housing once they have moved from transitional housing or other assistance program. Housing affordability for those who were formerly homeless is challenging from an economics standpoint, but this demographic group may also encounter fair housing issues when landlords refuse to rent to formerly homeless persons. The perception may be that they are more economically (and sometimes mentally) unstable.

Like many areas of California, San Bernardino County has a significant homeless population. The San Bernardino County Homeless Partnership (SBCHP) completed a point-in-time (PIT) count of homeless persons in the County in 2007, 2009, and 2011. The PIT count is a snapshot of persons that can be seen and counted on the streets and in emergency and transitional housing on any given day. As shown in Table 19, the 2011 PIT count identified 2,816 homeless persons in San Bernardino County, of whom 1,692 were unsheltered (60 percent). The 2011 count and related report showed a 66 percent increase from the 2009 count (1,736 persons).

Housing Status	Persons	Percent
Street Unsheltered Count	1,692	60%
Emergency Shelter	656	23%
Transitional Housing	468	16%
Total Homeless	2,816	100%

Source: 2011 Point-In-Time Count, San Bernardino County

Approximately 26 percent of the homeless reported living with a spouse and 50 percent reported living with children. Also, nearly 60 percent of survey respondents indicated that they had been homeless for 12 months or more. Approximately 32 percent of survey respondents reported being physically disabled, and 30 percent indicated that they were mentally ill. Twenty-two percent indicated that they had a developmental disability. Of those who provided a response, over 31 percent reported having an alcohol or drug problem. Just over one percent (1.5 percent) indicated that they had AIDS or HIV.

E. Housing Profile

The following sections provide an overview of the characteristics of the local and regional housing market.

1. Housing Unit Growth

Rapidly escalating housing prices in neighboring Los Angeles and Orange Counties during the 1980s caused an influx of residents from these areas to the more affordable housing markets of San Bernardino County. This occurred again between 2000 and 2006 when the population and related housing development increased significantly, especially in Victorville. This section addresses the housing characteristics of the housing supply in Apple Valley and Victorville, including growth, type and tenure, age, condition, costs, affordability, and availability. The

implications of these housing characteristics with respect to housing discrimination are also examined.

The 2010 Census reported 26,117 housing units in Apple Valley. Overall, Apple Valley had an average of 2.9 persons per household in 2010. Between 2000 and 2010, the Town experienced a 30 percent increase (5,954 units) in the housing stock from the Census-reported inventory of 20,163 units in 2000. Approximately 9.6 percent of all housing units were vacant in 2010.

In Victorville, the 2010 Census reported 36,655 housing units. Victorville had an average of 3.56 persons per household in 2010. Between 2000 and 2010, the City experienced a 63 percent increase (14,157 units) in the housing stock from the Census-reported inventory of 22,498 units in 2000. Approximately 11.2 percent of all housing units were vacant.

2. Housing Type

The housing stock in Apple Valley and Victorville largely consists of single-family detached homes. According to 2006-2010 ACS Five-Year Estimates, single-family detached homes accounted for 76 percent and 79 percent of the housing stock in Apple Valley and Victorville, respectively; single-family attached and multi-family housing accounted for 18 percent in Apple Valley and 16 percent in Victorville. About five percent of housing units in Apple Valley and Victorville are mobile homes. Surrounding jurisdictions share similar housing type characteristics, with all surrounding jurisdictions having considerably greater proportions of single-family homes. A total of 71 percent of housing units in San Bernardino County are single-family detached homes, with only 22 percent single-family attached or multi-family and six percent mobile homes.

3. Housing Tenure and Vacancy

Housing tenure describes the arrangement by which a household occupies a housing unit, that is, whether a housing unit is owner-occupied or renter-occupied. A person may face different fair housing issues in the rental housing market versus in the for-sale housing market. When housing vacancy rates are low, signifying a tight housing market, increased competition may also foster discriminatory activities.

Apple Valley and Victorville are composed predominantly of owner-occupied households (69 percent and 65 percent, respectively). It can be assumed that a number of rental properties are single-family units, given the proportion of single-family homes to the proportion of renters in the jurisdictions. Vacancy rates were reported by the 2010 Census as follows:

- Apple Valley: 4.0 percent for homeowner units and 10.0 percent for renter units
- Victorville: 4.9 percent for homeowner units and 11.1 percent for renter units
- San Bernardino County: 3.7 percent for homeowner units and 8.7 percent for renter units

Vacancy rates are generally higher among rental properties, as rental units have greater attrition than owner-occupied units. A healthy vacancy rate — one which permits sufficient choice and mobility among a variety of housing units — is considered to be two to three percent for

ownership units and five to six percent for rental units. Low vacancy rates can indicate a heightened likelihood of housing discrimination as the number of house-seekers increases while the number of available units remains relatively constant. Managers and sellers are then able to choose occupants based on possible biases because the applicant pool is large. In Apple Valley and Victorville, however, vacancy rates exceed healthy rates and as such, this issue is not anticipated to be major contributor to fair housing concerns currently.

As indicated in Table 20, in Apple Valley and Victorville renters are more likely to be low and moderate income, and are more likely to experience housing problems such as cost-burden and substandard housing conditions.

The 2010 Census data for tenure by race indicates that in Apple Valley, 74 percent of White households, 49 percent of Black households, 60 percent of Hispanic households, and 81 percent of Asian households were homeowners. Homeownership rates were generally in line with the income distribution among these groups. White and Asian households had higher median incomes and higher homeownership rates. In contrast, Hispanic and Black households had lower median incomes and comparatively lower homeownership rates.

In Victorville, 69 percent of White households, 44 percent of Black households, 62 percent of Hispanic households, and 76 percent of Asian households were homeowners. These percentages are also generally proportionate to median incomes of these groups.

Table 20: Apple Valley and Victorville Tenure Profile			
Tenure	Percent of All Households	Percent Low and Moderate Income	Housing Problems
Apple Valley			
Owner-Occupied	69%	37%	45%
Renter-Occupied	31%	69%	60%
All Households	100%	47%	49%
Victorville			
Owner-Occupied	65%	32%	46%
Renter-Occupied	35%	70%	62%
All Households	100%	45%	51%

Sources: HUD Comprehensive Housing Affordability Strategy (CHAS) Data; American Community Survey 2006-2008 Estimates.

4. Housing Condition

Housing Age

State and federal housing programs typically consider the age of a community’s housing stock when estimating rehabilitation needs. In general, most homes begin to require major repairs or have significant rehabilitation needs at 30 or 40 years of age. In rental units, landlords may not complete needed maintenance or repairs requested by tenants as buildings begin to age.

On average, housing stock in the Consortium area is newer compared to the regional housing stock. The majority of housing (approximately 70 percent in Apple Valley and 78 percent in Victorville) was built less than 30 years ago. Only 51 percent of housing in the County at large is more than 30 years old.

	Total Housing Units	% Built After 1979	% Built After 1969
Apple Valley	26,117	70%	85%
Victorville	36,655	78%	89%
San Bernardino County	699,637	51%	69%

Source: Census 2010, American Community Survey 2006-2010 5-Year Estimates

Note: Percent built prior to 1969 is inclusive of all built prior to 1979.

Substandard Housing

Substandard housing issues can include structural hazards, poor construction, faulty wiring or plumbing, fire hazards, and inadequate sanitation or facilities for living. The ACS reported on substandard housing; in the Consortium area, an estimated 94 units (Apple Valley) and 47 units (Victorville) have inadequate plumbing, and 139 units (Apple Valley) and 131 units (Victorville) are without a complete kitchen. Given the relatively young age of the housing stock in the Consortium area, the number of substandard housing units is limited. However, the large number of foreclosures in the area has created a different issue – abandoned homes and vandalism. Both Apple Valley and Victorville rigorously pursue code enforcement and housing rehabilitation programs to improve and maintain the housing stock.

Participants of the public meetings conducted for the AI expressed concerns over vandalism and theft on abandoned and foreclosed properties.

Lead-Based Paint Hazards

According to the federal Centers for Disease Control (CDC), approximately 250,000 children aged one to five years in the United States have elevated levels of lead in their blood. High blood lead levels are a concern because they may be harmful to a child’s developing organ systems such as the kidneys, brain, liver, and blood-forming tissues, potentially affecting a child’s ability to learn. Very high blood lead levels can cause devastating health consequences, including seizures, coma, and even death. Children are much more vulnerable to lead poisoning than adults because they put many kinds of items into their mouths. In addition, their bodies absorb up to 40 percent of the lead with which they come into contact, as opposed to only 10 percent absorbed by adults. Lead can enter the body through breathing or ingestion. Several factors contribute to higher incidence of lead poisoning:

- All children under the age of six years old are at higher risk.
- Children living at or below the poverty line are at a higher risk.
- Children in older housing are at higher risk.
- Children of some racial and ethnic groups and those living in older housing are at disproportionately higher risk.

Housing age is the key variable used to estimate the number of housing units with lead-based paint (LBP). Starting in 1978, the federal government prohibited the use of LBP on residential property. National studies estimate that 75 percent of all residential structures built prior to 1970 contain LBP. Housing built prior to 1940 is highly likely to contain LBP (estimated at 90 percent of housing units), and in housing built between 1960 and 1979, 62 percent of units are estimated to contain LBP.

According to the 2006-2010 ACS Five-Year Estimates, an estimated 5,581 units (representing 30 percent of the housing stock) in Apple Valley and an estimated 7,685 units (approximately 22 percent of the housing stock in Victorville) were constructed prior to 1980. As indicated in Table 22 below, an estimated 9,472 housing units have the potential to contain LBP in the Consortium area. However, not all units with LBP present a hazard. Properties most at risk include structures with deteriorated paint, chewable paint surfaces, friction paint surfaces, and deteriorated units with leaky roofs and plumbing.

Year Built	Apple Valley			Victorville		
	Units	Percent	Estimated No. of Units with LBP	Units	Percent	Estimated No. of Units with LBP
		with LBP			with LBP	
1960-1979	5,516	62% ± 10%	3,420 ± 552	5,670	62% ± 10%	3,515 ± 567
1940-1959	1,706	80% ± 10%	1,365 ± 171	1,638	80% ± 10%	1,310 ± 164
Before 1940	219	90% ± 10%	197 ± 21	377	90% ± 10%	340 ± 38
Total Units	7,441		4,982 ± 744	7,685		4,490 ± 769

Source: 2006-2010 American Community Survey Five-Year Estimates

The CHAS data developed for HUD by the U.S. Census provides data based on housing age and occupant income. Based on national studies on housing age and LBP hazards, and CHAS data on housing age and occupant income, the number/percentage of housing units with potential for lead-based paint hazards can be estimated for households with low and moderate incomes. In Apple Valley, 47 percent of owner-occupied units built prior to 1980 are occupied by low- and moderate-income households, and 54 percent of renter-occupied units built prior to 1980 are occupied by low- and moderate-income households. In Victorville, 53 percent of owner-occupied units built prior to 1980 are occupied by low- and moderate-income households; 70 percent of renter-occupied units built prior to 1980 are occupied by low- and moderate-income households.

In San Bernardino County, lead paint hazards are monitored by the San Bernardino County Health Department Childhood Lead Poisoning Prevention Program (CLPPP). In 2011, CLPPP reported a total of 51 new cases in San Bernardino County, including two new cases in Apple Valley and two new cases in Victorville, with blood lead levels of 10 micrograms per deciliter (mg/dL) or higher. The Center for Disease Control has determined that a child with a blood lead level of 15 to 19 mg/dL is at high risk for lead poisoning, while a child with a blood lead level above 19 mg/dL requires full medical evaluation and public health follow-up.

F. Housing Costs and Affordability

Many housing problems such as housing overpayment or overcrowded housing are directly related to the cost of housing in a community. If housing costs are high relative to household income, a correspondingly high prevalence of housing problems occurs. This section evaluates the affordability of the housing stock within the Consortium area to lower- and moderate-income households.

Housing affordability alone is not necessarily a fair housing issue. Only when housing affordability issues interact with other factors covered under fair housing laws such as household type, composition, and race/ethnicity do fair housing concerns arise.

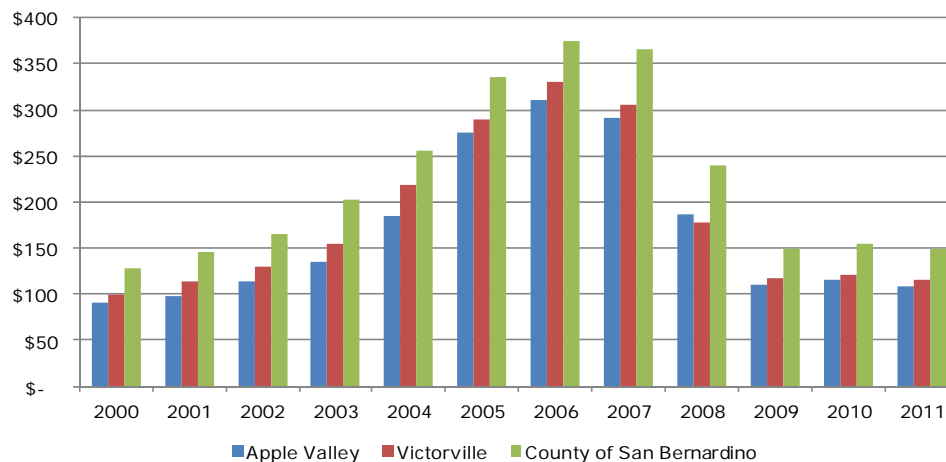
1. Ownership Housing Cost

In Apple Valley and Victorville, like home sales throughout the Southern California region, housing sales prices rose dramatically from 2002 through 2006 then drastically decreased in the subsequent four years. The table below shows the median cost of resale housing in Apple Valley and Victorville, along with surrounding areas, in the past two years. A graph of home prices over the past decade is presented in Figure 6. Housing prices in Apple Valley and Victorville are generally lower than San Bernardino County as a whole and significantly lower than the Southern California regional median housing sale price, which peaked at \$552,000 in 2007 and was estimated at \$291,000 in 2010.

County/City/Area	Number Sold	Year 2011 Median	Year 2010 Median	Percent Change
Apple Valley	1,452	\$109,000	\$116,000	-6.03%
Victorville	3,090	\$115,000	\$121,000	-4.96%
San Bernardino County	28,573	\$150,000	\$155,000	-3.23%

Sources: SCAG, 2010; and Dataquick, 2011.

Figure 6: Home Sale Prices 2000-2011 (in thousands)



2. Rental Housing Cost

The 2006-2010 ACS Five-Year Estimate identified median rents of \$818 in Apple Valley and \$896 in Victorville. A point-in-time review of housing units for rent in Apple Valley and Victorville was conducted in February 2012. At that time, rents within the Consortium area ranged from \$400 for a studio apartment to \$1,500 for a four-bedroom unit.

Unit Size	Average Rent Apple Valley	Average Rent Victorville
Studio	\$475	n/a
1-Bedroom	\$650	\$700
2-Bedroom	\$725	\$770
3-Bedroom	\$1070	\$965
4-Bedroom		\$1280
5-Bedroom	n/a	

Source: Inlandempire.craigslist.org, February 7, 2012

3. Housing Affordability

Housing affordability can be estimated by comparing the cost of renting or owning a home with the maximum affordable housing costs to households at different income levels. Taken together, this information can generally indicate the size and type of housing available to each income group and can indicate which households are more susceptible to overcrowding and cost burden. In evaluating affordability, the maximum affordable price refers to the maximum amount that could be afforded by households in the upper range of their respective income categories. Table 25 shows annual household income by household size. The maximum affordable housing payment is based on the standard of 30 to 35 percent of household income. General cost assumptions for utilities, taxes, and property insurance are also shown.

The median home price (\$109,000 in Apple Valley and \$115,000 in Victorville) in 2011 places homeownership within reach for the Consortium's low- and moderate-income households. However, access to mortgage financing may be an issue. Very low-income households are usually confined to rental housing which, although more affordable than elsewhere in the region, may still exceed affordability for these households. Furthermore, the affordability of rental units varies widely based on unit size; while many smaller units are affordable to low- and moderate-income households, larger units may not be, presenting a problem for larger households.

Table 25: San Bernardino County Housing Affordability

Income Group	Income Levels		Utilities	Taxes and Insurance	Maximum Affordable Housing Costs	
	Annual Income	Affordable Payment			Home	Rental
Extremely Low (0-30% MFI)						
One Person	\$14,100	\$353	\$50	\$80	\$46,053	\$303
Small Family	\$18,100	\$453	\$50	\$90	\$64,681	\$403
Large Family	\$21,750	\$544	\$50	\$100	\$81,498	\$494
Low (30-50% MFI)						
One Person	\$23,450	\$586	\$50	\$115	\$87,190	\$536
Small Family	\$30,150	\$754	\$100	\$130	\$108,406	\$654
Large Family	\$36,200	\$905	\$150	\$145	\$126,258	\$755
Moderate (50-80% MFI)						
One Person	\$37,550	\$939	\$50	\$165	\$149,801	\$889
Small Family	\$48,250	\$1,206	\$100	\$190	\$189,645	\$1,106
Large Family	\$57,900	\$1,448	\$150	\$220	\$223,020	\$1,298

Notes:

1. Small Family = 3 persons; Large Families = 5 or more persons
2. Utility costs for renters assumed at \$50/\$100/\$150 per month
3. Monthly affordable payment is based on payments of no more than 30% of household income
4. Property taxes and insurance based on averages for the region, paid by owners only
5. Calculation of affordable home sales prices based on a down payment of 10%, annual interest rate of 5%, 30-year mortgage, and monthly payment of gross household income
6. Based on San Bernardino County MFI \$63,300 and 2012 HCD State Income Limits

G. Housing Problems

A continuing priority of communities is enhancing or maintaining the quality of life for residents. A key measure of quality of life in Apple Valley and Victorville is the extent of “housing problems.” HUD assesses housing need within a city according to two criteria: (1) the number of households that are paying too much for housing, and (2) the number of households living in overcrowded units.

1. Overpayment (Cost Burden)

According to the federal government, any housing condition where a household spends more than 30 percent of income on housing is considered overpayment. A cost burden of 30 to 50 percent is considered moderate overpayment; payment in excess of 50 percent of income is considered severe overpayment. Overpaying is an important housing issue because paying too much for housing leaves less money available for emergency expenditures.

In Apple Valley and Victorville, the majority of low- and moderate-income households experience a housing cost burden; in fact, approximately half of all low- and moderate-income households experience a severe housing cost burden (Table 26). Renter-occupied households in

both jurisdictions are more likely to experience housing cost burden than owner-occupied households.

Table 26: Housing Cost Burden						
Cost Burden	Low- and Moderate-Income Households			All Households		
	Cost Burden	Severe Cost Burden	Total	Cost Burden	Severe Cost Burden	Total
Apple Valley						
Owner-Occupied	20%	46%	66%	22%	21%	43%
Renter-Occupied	28%	59%	77%	21%	41%	62%
All Households	24%	52%	71%	21%	27%	49%
Victorville						
Owner-Occupied	20%	42%	62%	25%	18%	44%
Renter-Occupied	25%	55%	81%	21%	39%	60%
All Households	23%	49%	72%	24%	25%	49%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey 2006-2008 Estimates.

2. Overcrowding

Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

According to state and federal guidelines, an overcrowded housing unit is defined as a unit with more than one person per room, excluding bathrooms, kitchens, hallways, and porches. Severe overcrowding is described as households with more than 1.5 persons per room. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families are doubling up to afford housing. Not only is overcrowding a potential fair housing concern, it can strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

According to 2006-2010 ACS Five-Year Estimate, 4.3 percent of households in Apple Valley and Victorville were overcrowded (Table 27). Overcrowding is three to four times more prevalent among renter-households than owner-households.

Table 27: Overcrowding in Apple Valley and Victorville

	Apple Valley		Victorville		Total
	Owner-occupied	Renter-occupied	Owner-occupied	Renter-occupied	
Household Tenure	15,843	6,559	30,427	10,689	63,518
Overcrowded (1+ occupants per room)	171	494	608	973	2,246
Severely Overcrowded (1.5+ occupants per room)	93	117	143	160	513
Percent Overcrowded	1.7%	9.3%	2.5%	10.6%	4.3%

Source: 2006-2010 American Community Survey 5-Year Estimates.

H. Assisted Housing

The availability and location of public and assisted housing may be a fair housing concern. If such housing is concentrated in one area of a community, a household seeking affordable housing is limited to choices within that area. In addition, public/assisted housing and Housing Choice Voucher (formerly known as Section 8) assistance should be accessible to lower-income households regardless of race/ethnicity, disability, or other protected class status.

1. Public Housing

The Housing Authority of the County of San Bernardino (HACSB) is the largest provider of affordable housing, serving nearly 30,000 individuals and families throughout the County of San Bernardino. In addition to the Housing Choice Voucher program (discussed below), the HACSB manages 1,308 units of public housing throughout San Bernardino County; three of those units are located in the Town of Apple Valley and two units in Victorville. These units were developed or acquired with funding from HUD, and the HACSB continues to receive operating subsidies for these units. Demographic data for public housing residents in Apple Valley and Victorville are unavailable due to the small sample size. Demographic data for persons on the public housing wait list are also currently unavailable.

Table 28: Apple Valley and Victorville Public Housing

Address	Number of Units
14307 Pioneer Rd. Apple Valley, CA	1
22354 Cholena Rd. Apple Valley, CA	1
13476 Joshua Rd Apple Valley, CA.	1
12472 Emeraldstone Dr. Victorville, CA	1
13645 Arroyo Dr. Victorville, CA	1

Source: HACSB, December 2011.

The scattered-site public housing program is designed to provide small-scale public housing that blends in with the surrounding neighborhoods. This program targets very low-income and low-income Apple Valley and Victorville residents. The HACSB maintains a waiting list for the scattered sites public housing by region. Apple Valley and Victorville are located in Region 3, along with Adelanto and Hesperia. For Region 3, the waiting list for one-bedroom units is

closed. The waiting list for two-bedroom and three-bedroom units is open as of February 2012. Under the project-based voucher program, the Housing Authority enters into an assistance contract with the owner for specified units and for a specified term. The Housing Authority refers families from its waiting list to the project owner to fill vacancies. Because the assistance is tied to the unit, a family which moves (voluntarily or through eviction) from the project-based voucher unit does not have any right to continued housing assistance.

In addition to scattered sites voucher waiting lists by region, the HACSB also maintains a waiting list for particular senior housing communities that have been developed in the form of a Project-Based Housing Choice Voucher. The waiting lists for certain project-based Housing Choice Voucher locations are open. In Victorville, the HACSB is currently accepting applications for the Project Based Voucher program at Desert Village. There is no waiting list for the public housing units in the Town of Apple Valley (three units) or the City of Victorville (two units). When the families currently occupying the units vacate, the housing units will be sold through the Housing Authority Homeownership Program.

2. Housing Choice Voucher and Waiting List

The Housing Choice Voucher is a rent subsidy program that helps low-income (up to 50 percent AMI)⁶ families and seniors pay rents in private units. Voucher recipients pay a minimum of 30 percent of their income toward their contract rent, and the local housing authority pays the difference through federal funds up to the payment standard (fair market rent) established by the HACSB. Any amount in excess of the payment standard is paid by the voucher recipient.

The HACSB administers the Housing Choice Voucher program on behalf of the Town of Apple Valley and City of Victorville. As of December 2011, 333 households in Apple Valley and 994 households in Victorville were receiving Housing Choice Voucher assistance. Information on family type, race, and ethnicity of participants is provided in Table 29. As shown, 58 percent of the voucher recipients in Apple Valley were Black, 41 percent were White, and 17 percent were Hispanic. In Victorville, 74 percent of the voucher recipients were Black, 25 percent were White, and 16 percent were Hispanic.

Given the ethnic composition of each jurisdiction, Black households appear to be overrepresented in the Housing Choice Voucher program. In contrast, Hispanic households may be slightly underrepresented in Victorville, indicating a need for greater outreach efforts.

The HACSB has a waiting list for the Housing Choice Voucher program. As of February 7 2012, 20,764 households were on the list, 797 of which were residents of Apple Valley and 1,700 residents of Victorville. Table 29 outlines the characteristics of the households on the waiting list. The Housing Choice Voucher waiting list was last open during March 2007. The Housing Authority is unable to forecast when the list would be reopened again. Given the long waiting list for a Housing Choice Voucher, the extensive need for rental assistance in San Bernardino

⁶ The Housing Choice Voucher Program refers to households with incomes below 50 percent of the AMI as “very low-income.” For consistency throughout this Consolidated Plan document, households qualifying for Housing Choice Vouchers (incomes <50 percent AMI) are referred to as low-income households.

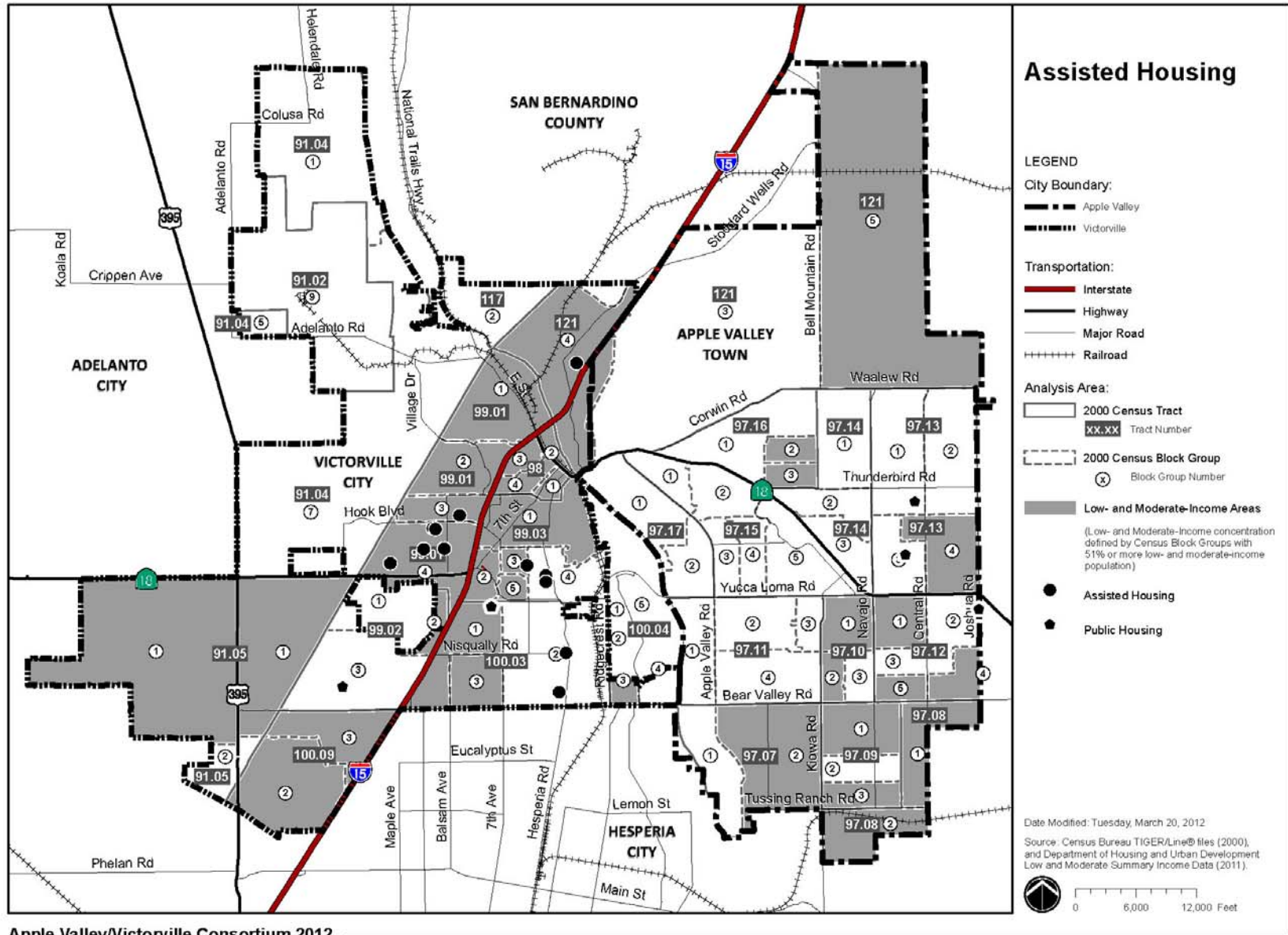
County is evident. To reach the households with the most need, veterans are given preference for the Housing Choice Voucher program.

Table 29: Demographics of Housing Choice Voucher Participants & Waiting List					
	Voucher Participants		Voucher Waiting List		
	Town of Apple Valley	City of Victorville	Town of Apple Valley	City of Victorville	County of San Bernardino
Totals	333	994	797	1,700	20,764
Family Type					
Elderly	20%	18%	6%	5%	6%
Disabled	48%	35%	>1%	1%	1%
Race					
White	41%	25%	35%	23%	24%
Black	58%	74%	47%	57%	57%
American Indian	0%	1%	2%	1%	1%
Asian	0%	0%	>1%	>1%	>1%
Native Hawaiian	1%	0%	>1%	>1%	>1%
Other/Declined to Answer	0%	0%	13%	15%	14%
Ethnicity					
Hispanic	17%	16%	22%	21%	25%
Non-Hispanic	83%	84%	66%	66%	64%
Declined to Answer	0%	0%	11%	11%	10%

3. Other Assisted Housing

Utilizing NSP/HOME funds, Happy Trails Villas, a 34 unit for sale affordable condominium project (all 3 bedrooms), is currently under construction in Apple Valley. A total of 26 units will be available for sale to households at 80% of AMI. Eight units will be available to households at 120% AMI. This project is located at Hwy 18 and Kiowa. The City of Victorville has a significant number of affordable housing units that receive public subsidies in return for long-term affordability controls. Apple Valley does not have locally subsidized rental units. However, the Town is in the process of negotiating the construction of affordable housing for low-income seniors (50 units). Construction is anticipated to begin in 2012. Figure 7 shows the location of the public and assisted affordable units in Apple Valley and Victorville. Most of the affordable subsidized housing stock is concentrated in Victorville along the I-15 corridor. Much of Victorville's assisted housing is located in the City's low/mod areas.

Figure 7: Affordable Housing Projects



Chapter 4: Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent tightening of lending/credit markets. This chapter reviews the lending practices of financial institutions and the access to financing for all households, particularly minority households and those with lower incomes. Lending patterns in lower and moderate income neighborhoods and areas of minority concentration are also examined. However, publicly available data on lending does not contain detailed information to make conclusive statements of discrimination, but can only point out potential areas of concerns. Furthermore, except for outreach and education efforts, a local jurisdiction's ability to influence lending practices is limited. Such practices are largely governed by national policies and regulations.

A. Background

Discriminatory practices in home mortgage lending have evolved over the last five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. Today, discriminatory lending practices are more subtle and tend to take different forms. While mortgage loans have become more readily available in lower and moderate income minority communities, some mortgage brokers pushed borrowers into higher-cost subprime mortgages that were not well suited to their needs and have led to financial problems. Although the recent tightening of credit markets has made this type of predatory lending less common, minority consumers continue to have less-than-equal access to loans at the best price and on the best terms that their credit history, income, and other individual financial considerations merit.

1. Legislative Protection

In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as redlining were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending.

Community Reinvestment Act and Home Mortgage Disclosure Act

The CRA is intended to encourage regulated financial institutions to help meet the credit needs of their entire communities, including lower and moderate income neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

CRA ratings are provided by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and the Office of

the Comptroller of the Currency (OCC). However, the CRA rating is an overall rating for an institution and does not provide insights regarding the lending performance at specific locations by the institution.

Home Mortgage Disclosure Act

In tandem with the CRA, the HMDA requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data are only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices due to the lack of detailed information on loan terms or specific reasons for denial. The City should continue to monitor the approval rates among racial/ethnic and income groups and continue to take appropriate actions to remove barriers to financing.

Conventional versus Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower and moderate income households that may have difficulty in obtaining home mortgage financing in the private market, due to income and equity issues, several government agencies offer loan products that have below market rate interests and are insured (“backed”) by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often, government-backed loans are offered to the consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

Typically, lower income households have a much better chance of getting a government-assisted loan than a conventional loan. However, the recent lending market offered subprime loan options such as zero percent down, interest-only, and adjustable loans. As a result, government-backed loans have been a less attractive option for many households.

With the current difficulties in the subprime housing market, many households are facing foreclosure. In response, the federal government in September 2007 created a government-insured foreclosure avoidance initiative, FHASecure, to assist tens of thousands of borrowers nationwide in refinancing their subprime home loans. As government-backed loans are again publicized and subprime loans are less of an option to borrowers, the increased use of government-backed loan applications is likely. Expanded marketing to assist potential homeowners in understanding the requirements and benefits of these loans may be necessary to promote the use of government-backed loans.

Financial Stability Act

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted toward homeowners facing foreclosure and homeowners who are unemployed or “underwater” (i.e., homeowners who owe more on their mortgage than their home is worth). The Making Home Affordable Program includes several options for homeowners in need of assistance:

- The Home Affordable Modification Program (HAMP) reduces a homeowner’s monthly mortgage payment to 31 percent of their verified gross (pre-tax) income to make their payments more affordable.
- The Second Lien Modification Program (2MP) offers homeowners a way to lower payments on their second mortgage.
- The Home Affordable Refinance Program (HARP) assists homeowners whose mortgages are current and held by the Federal National Mortgage Association (Fannie Mae) or the Federal Home Loan Mortgage Corporation (Freddie Mac) refinance into a more affordable mortgage.
- An Unemployment Program provides eligible homeowners a forbearance period during which their monthly mortgage payments are reduced or suspended while they seek re-employment. The minimum forbearance period is three months, although a mortgage servicer may extend the term depending on applicable investor and regulatory guidelines.
- The Principal Reduction Program offers homeowners who are underwater the opportunity to earn principal reductions over a three-year period by successfully making payments in accordance with their modified loan terms.
- For homeowners who can no longer afford their homes, but do not want to go into foreclosure, the Home Affordable Foreclosure Alternatives Program (HAFA) offers homeowners, their mortgage servicers, and investors incentives for completing a short sale or deed-in-lieu of foreclosure. HAFA enables homeowners to transition to more affordable housing while being released from their mortgage debt. The program also includes a “cash for keys” component whereby a homeowner receives financial assistance to help with relocation costs in return for vacating their property in good condition.

Helping Families Save Their Homes Act

The Helping Families Save Their Homes Act was passed by Congress in May 2009 and expands the Making Home Affordable Program. This Act includes provisions to make mortgage assistance and foreclosure prevention services more accessible to homeowners and increases protections for renters living in foreclosed homes. It also establishes the right of a homeowner to

know who owns their mortgage and provides over two billion dollars in funds to address homelessness.

The Act targets underwater borrowers by easing restrictions on refinance and requiring principal write-downs to help these homeowners increase the equity in their homes. The new law also provides federally guaranteed Rural Housing loans and FHA loans as part of the Making Homes Affordable Program. In addition to expanding the Making Homes Affordable Program, the Act extends the temporary increase in deposit insurance, increases the borrowing authority of the FDIC and National Credit Union Administration (NCUA), and creates a Stabilization Fund to address problems in the corporate credit union sector.

Under this new bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease. The bill also provides similar protections to housing voucher holders. These protections went into effect in 2009 and are set to expire at the end of 2012. Prior to this bill, tenants were only guaranteed 60 days of notice before eviction and any current lease was considered terminated in the event of a foreclosure. This Act extends the 60-day notification period to 90 days and requires banks to honor any existing lease on a property in foreclosure.

Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal government, making them liable under federal bank fraud criminal statutes. The new law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business. In addition, FERA includes provisions to protect funds expended under TARP and the Recovery Act and amends the Federal securities statutes to cover fraud schemes involving commodity futures and options. Additional funds were also made available, under FERA, to a number of enforcement agencies in order to investigate and prosecute fraud.

B. Overall Lending Patterns

Data and Methodology

The availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing, whether financed at market rate or with government assistance.

HMDA data are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports. The analyses of HMDA data presented in this AI were conducted using Lending Patterns™. Lending Patterns is a web-based data exploration tool that analyzes lending records to produce reports on

various aspects of mortgage lending. It analyzes HMDA data to assess market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other aspects.

For this AI report, the HMDA data for Apple Valley and Victorville was compiled by census tract and aggregated to the area that generally approximates the boundaries of the two jurisdictions. Utilizing Lending Patterns, this AI reviews fair lending statistics (such as spread disparities and denial disparities) by race/ethnicity, by lender, and in low/moderate income areas, as well as in minority concentration areas.

Table 30 summarizes the disposition of loan applications submitted to financial institutions in 2007 (beginning of the housing crisis) and 2010 (most recent HMDA data available) for home purchase, refinance, and home improvement loans in Apple Valley and Victorville. Included is information on loan applications that were approved and originated, approved but not accepted by the applicant, denied, withdrawn by the applicant, or incomplete.

Table 30: Disposition of Home Loans (2007 and 2010)								
Loan Type	Total Applicants		Percent Approved		Percent Denied		Percent Other	
	2007	2010	2007	2010	2007	2010	2007	2010
<i>Apple Valley</i>								
Government-Backed Purchase	94	929	67.0%	74.9%	11.7%	9.9%	21.3%	15.2%
Conventional Purchase	2,550	628	58.2%	68.5%	14.7%	16.9%	27.1%	14.6%
Refinance	6,980	1,320	46.6%	56.1%	56.1%	23.6%	19.4%	20.3%
Home Improvement	1,298	74	41.0%	35.1%	44.7%	51.4%	14.3%	13.5%
Total	10,922	2,951	48.8%	64.1%	33.5%	18.5%	17.7%	17.4%
<i>Victorville</i>								
Government-Backed Purchase	345	2,611	65.2%	68.9%	16.2%	15.5%	18.6%	15.6%
Conventional Purchase	7,814	1,118	58.9%	69.1%	26.0%	18.4%	15.1%	12.5%
Refinance	13,574	1,703	44.6%	55.3%	36.3%	24.4%	19.1%	20.3%
Home Improvement	2,431	162	41.0%	38.3%	45.9%	46.3%	13.1%	15.4%
Total	24,164	5,594	49.1%	63.9%	33.7%	19.7%	17.2%	16.4%

Source: www.lendingpatterns.com, 2012.

1. Home Purchase Loans

In 2010, a total of 628 households applied for conventional loans to purchase homes in Apple Valley. In Victorville, 1,118 households applied for conventional home purchase loans. This reflects a 75 percent decrease for Apple Valley and 86 percent decline for Victorville from 2007 lending activity. The substantial decrease in lending activity is reflective of lending patterns throughout the country. Housing prices, both in the region and nationwide, peaked in 2006 and 2007 marked the start of the housing market's steep decline. Mortgage lending in 2007, while not as vigorous as in the previous year, was still active. However, in the following years lending activity slowed down dramatically to match the lack of activity in the housing market.

In Apple Valley, the overall approval rate in 2010 for conventional home purchase loans was 64 percent and 17 percent of applications were denied. Similarly, 69 percent of applications in Victorville were approved and 18 percent were denied. This reflects a significant increase from 2007, when just 58 percent of conventional home loan applications were approved in Apple Valley and 59 percent of applications were approved in Victorville. When the housing market began to show signs of collapse and foreclosures were on the rise, many financial institutions instituted stricter approval criteria for potential borrowers, which should have caused approval rates to drop somewhat. However, the applicant pool for mortgage lending in recent years has also become smaller and increasingly selective. These applicants have generally been in much better shape financially than applicants from earlier in the decade, when the housing bubble attracted a wider range of potential borrowers.

Generally, two types of home purchase loans are tracked—conventional home purchase loans and government-backed home purchase loans. In a conventional loan, the lender takes on the risk of losing money in the event a borrower defaults on a mortgage. For government-backed loans, the loan is insured, either completely or partially, by the government. The government does not provide the loan itself, but instead promises to repay some or all of the money in the event a borrower defaults. This reduces the risk for the lender when making a loan.

Government-backed loans have more lenient credit score requirements, lower downpayment requirements, and are available to those with recent bankruptcies. However, these loans may also carry higher interest rates and most require homebuyers to purchase mortgage insurance. Furthermore, government-backed loans have strict limits on the amount a homebuyer can borrow for the purchase of a home. In competitive and high-end housing markets, many of the homes available for purchase exceed the maximum allowable loan amount, making government-backed loans much less popular. The relatively lower cost housing market in Apple Valley and Victorville, however, has made government-backed loans a feasible and practical option for homebuyers in the region.

In both Apple Valley and Victorville, the number of applications for government-backed home purchase loans considerably surpassed the number of applications for conventional home purchase loans in 2010. Approximately 929 home purchase applications were submitted in Apple Valley through government-backed loans (for example, FHA, VA) and 2,611 applications were submitted in Victorville. Approval rates were similar to those for conventional home purchase loans. For Apple Valley, 75 percent of government-backed loan applications were approved and 69 percent of applications from Victorville were approved. In 2007, government-backed home loans made up a considerably smaller proportion of total lending activity for both jurisdictions. Apple Valley residents filed only 94 applications and Victorville residents filed 345 applications for government-backed home purchase loans. During this time, conventional home purchase applications overwhelmingly outnumbered applications for government-backed loans for both jurisdictions. Since 2007, however, the increasingly stringent credit and downpayment requirements for conventional purchase loans have caused potential borrowers to turn more towards government-backed loans, where lending criteria is typically less strict. About 67 percent of applications for government-backed loans in 2007 were approved in Apple Valley and 65 percent were approved in Victorville.

2. Home Improvement Loans

Reinvestment in the form of home improvement is critical to maintaining the supply of safe and adequate housing. Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner's equity represents a higher risk.

In 2010, only 74 applications for home improvement loans were received in Apple Valley; the City of Victorville had 162 applications. Approximately 35 percent of applications from Apple Valley and 39 percent of applications from Victorville were approved, and about one-half of the applications from both jurisdictions were denied.

Home improvement financing, like home purchase lending and mortgage refinancing, was much more active in 2007. About 17 times more applications (1,298 applications) for home improvement loans were filed in 2007 by Apple Valley residents. Victorville residents filed 15 times as many applications (2,431 applications) during 2007 than they did in 2010. Approval rates for this type of loan also decreased between 2007 and 2010. In both jurisdictions, 41 percent of home improvement loan applications were approved in 2007.

3. Refinancing

Homebuyers will often refinance existing home loans for a number of reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e. by switching from variable rate to fixed rate loans), or free up cash and capital. A substantial proportion of loan applications submitted in Apple Valley and Victorville in 2010 were for refinancing existing home loans (1,320 applications in Apple Valley and 1,703 applications in Victorville). About 56 percent of these applications were approved in Apple Valley, while 24 percent were denied. In Victorville, 55 percent of refinance applications were approved and 24 percent were denied.

Refinance lending was much more active in 2007. The housing market peaked in 2006 and many households purchased homes during peak using adjustable rates and loans with low interest rates only for a short term. With the upward trending of adjustable rates and the expiration of the short-term low-interest loans, many households sought refinancing. In Apple Valley, 6,980 applications for refinancing were filed in 2007, five times more than the number of applications in 2010. In Victorville, 13,574 applications were filed, nearly eight times more than the number of applications in 2010 but with lower approval rates. With the bursting of the "housing bubble" in 2006, many households were facing high housing payments and declining home value. Refinancing was far more difficult than they were led to believe when purchasing the home.

Refinancing in the current market is substantially more difficult than it has been in the past. Financial institutions have established much stricter requirements for mortgage refinancing, making it harder for homeowners to qualify for a refinance loan. Even homeowners who have excellent credit and a low debt-to-income ratio face obstacles to refinancing, such as a lack of home equity. Some homeowners have little or no equity because they bought their property with minimal down payments; alternatively, many homeowners who had equity have watched it erode in recent years because of decreasing home values. As a result, fewer households would qualify for refinancing. In response, recent federal legislation was passed to require lenders to work with homeowners to pursue loan modifications.

C. Lending Patterns by Race/Ethnicity and Income Level

The federal Fair Housing Act prohibits discrimination in mortgage lending based on race, color, national origin, religion, sex, familial status or handicap (disability). It is, therefore, important to look not just at overall approval and denial rates for a jurisdiction, but also whether or not these rates vary by other factors, such as race/ethnicity. An analysis of lending patterns for different races/ethnicities of the same income levels can help reveal patterns not discernible when analyzing lending data by race or income separately.

Table 31: Lending Patterns by Race/Ethnicity for Apple Valley						
	Approved		Denied		Withdrawn/ Incomplete	
	2007	2010	2007	2010	2007	2010
White						
Low (0-49% AMI)	41.8%	67.8%	44.8%	19.8%	13.4%	12.3%
Moderate (50-79% AMI)	55.4%	69.7%	30.6%	16.5%	13.9%	13.8%
Middle (80-119% AMI)	55.9%	68.5%	30.3%	17.6%	13.9%	13.9%
Upper (≥120% AMI)	56.8%	74.6%	28.3%	6.2%	14.9%	19.2%
Black						
Low (0-49% AMI)	37.5%	57.1%	50.0%	21.4%	12.5%	21.4%
Moderate (50-79% AMI)	44.6%	56.5%	41.1%	8.7%	14.3%	34.8%
Middle (80-119% AMI)	40.0%	79.2%	46.7%	20.8%	13.3%	0.0%
Upper (≥120% AMI)	46.3%	52.8%	39.8%	27.8%	13.9%	19.4%
Hispanic						
Low (0-49% AMI)	38.3%	73.2%	42.6%	19.5%	19.1%	7.3%
Moderate (50-79% AMI)	43.6%	69.0%	41.3%	16.8%	15.2%	14.2%
Middle (80-119% AMI)	46.2%	67.7%	38.6%	19.2%	15.1%	13.1%
Upper (≥120% AMI)	46.0%	61.3%	39.3%	18.9%	14.7%	19.8%
Asian						
Low (0-49% AMI)	33.3%	0.0%	66.7%	66.7%	0.0%	33.3%
Moderate (50-79% AMI)	71.4%	68.0%	14.3%	28.0%	14.3%	4.0%
Middle (80-119% AMI)	70.8%	42.1%	12.5%	42.1%	16.7%	15.8%
Upper (≥120% AMI)	54.5%	63.6%	29.6%	21.8%	16.0%	14.5%

Source: www.lendingpatterns.com, 2012.

Note: Applications that did not disclose income level were not included.

In Apple Valley, the rate at which applications were withdrawn and incomplete was relatively consistent across all races/ethnicities and income levels in both 2007 and 2010. White applicants generally had the highest approval rates in 2010; while, in 2007, White and Asian applicants received the highest approval rates. Blacks and Hispanics had the lowest approval rates across all income categories in 2007; however, by 2010, approval rates for Hispanic applicants were on par with the approval rates for White applicants. Approval rates for Black applicants, though, remained noticeably lower than for Whites. In 2010, only 53 percent of upper income Black applicants were approved for loans versus 75 percent of upper income White applicants. Even among the highest income categories, where applicants are assumed to be the most financially capable of purchasing a home, approval rates for Blacks were 22 points lower than approval rates for White applicants. Correspondingly, Black applicants were also the most likely to be denied loans in 2007 and 2010. In 2007, Hispanic applicants were also noticeably more likely to be denied loans.

Table 32: Lending Patterns by Race/Ethnicity for Victorville						
	Approved		Denied		Withdrawn/ Incomplete	
	2007	2010	2007	2010	2007	2010
White						
Low (0-49% AMI)	43.7%	64.2%	43.7%	19.1%	12.7%	16.7%
Moderate (50-79% AMI)	48.4%	71.5%	34.3%	17.0%	17.3%	11.5%
Middle (80-119% AMI)	53.5%	66.0%	30.4%	17.6%	16.2%	16.3%
Upper (≥120% AMI)	55.3%	66.7%	30.1%	17.3%	14.6%	15.9%
Black						
Low (0-49% AMI)	32.5%	60.7%	57.5%	31.1%	10.0%	8.2%
Moderate (50-79% AMI)	42.4%	61.3%	39.7%	25.0%	17.9%	13.7%
Middle (80-119% AMI)	42.1%	67.1%	44.7%	24.4%	13.2%	8.5%
Upper (≥120% AMI)	45.5%	56.2%	39.4%	27.0%	15.2%	16.9%
Hispanic						
Low (0-49% AMI)	31.5%	70.8%	56.0%	23.2%	12.5%	6.0%
Moderate (50-79% AMI)	43.2%	70.1%	43.6%	23.8%	13.2%	6.1%
Middle (80-119% AMI)	65.9%	66.7%	17.0%	21.3%	17.1%	12.0%
Upper (≥120% AMI)	50.7%	58.3%	33.4%	25.2%	16.0%	16.5%
Asian						
Low (0-49% AMI)	25.0%	66.2%	50.0%	20.0%	25.0%	13.8%
Moderate (50-79% AMI)	47.8%	63.8%	28.3%	21.0%	23.9%	15.2%
Middle (80-119% AMI)	59.6%	72.4%	23.6%	15.8%	16.8%	11.8%
Upper (≥120% AMI)	55.6%	74.0%	27.6%	16.5%	16.8%	9.4%

Source: www.lendingpatterns.com, 2012.

As with Apple Valley, fallout rates in Victorville were relatively consistent across all racial/ethnic groups and income categories in 2010. Asian applicants in 2007, however, did experience noticeably higher rates of fallout than all other racial/ethnic groups.

In 2010, Asian applicants in Victorville had the highest approval rates, while Black applicants had the lowest approval rates. Generally, approval rates for Black applicants were about 10 points lower than for White and Asian applicants in both 2007 and 2010. Approval rates for Hispanics applicants have increased since 2007, and by 2010, approval rates for Hispanics were comparable to the approval rates for Whites. While Whites did not have the highest approval rates in 2010, they were the least likely to be denied loans. Denial rates for White applicants were notably lower than for all other race/ethnic groups across all income categories.

While this analysis provides a more in-depth look at lending patterns, it does not conclusively explain any of the discrepancies observed. Aside from income, many other factors can contribute to the availability of financing, including credit history, the availability and amount of a down payment, and knowledge of the home buying process. HMDA data does not provide insight into these other factors.

In Apple Valley and Victorville, Black households had lower loan approval rates than all other racial/ethnic groups in the same income group in both 2007 and 2010. Also, Hispanic households had low approval rates in 2007 but by 2010, approval rates for Hispanic households matched closely with rates for White households.

In Victorville, Asian households had comparatively higher rates of loan fallouts in 2007. Language barrier may be an issue.

D. Lending Patterns by Census Tract Characteristics

1. Income Level

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by census tract. Based on the Census, HMDA defines the following income levels:⁷

- Low Income Tract – Tract Median Income \leq 49 percent AMI
- Moderate Income Tract – Tract Median Income between 50 and 79 percent AMI
- Middle Income Tract – Tract Median Income between 80 and 119 percent AMI
- Upper Income Tract – Tract Median Income \geq 120 percent AMI

In 2010, none of the census tracts in Apple Valley were categorized as Low Income by HMDA. Conversely, the City of Victorville had no census tracts categorized as Upper Income. Applications from Moderate and Middle Income census tracts made up the bulk of the lending applications from both jurisdictions. Table 33 summarizes the loan approval and denial rates of census tracts in both jurisdictions by income level in 2010. In general, home loan approval rates increased as the income level of the census tract increased. Higher income households are more likely to qualify for and be approved for loans so this trend is to be expected.

⁷ These income definitions are different from those used by HUD to determine Low and Moderate Income Areas.

Table 33: Outcomes Based on Census Tract Income (2010)								
Tract Income Level	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
<i>Apple Valley</i>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	647	22.0%	397	61.4%	126	19.5%	124	19.2%
Middle	1,704	57.7%	1,079	63.3%	328	19.2%	297	17.4%
Upper	600	20.3%	416	69.3%	93	15.5%	91	15.2%
Total	2,951	100.0%	1,892	64.1%	547	18.5%	512	17.4%
<i>Victorville</i>								
Low	45	0.8%	20	44.4%	11	24.4%	14	31.1%
Moderate	2,779	49.7%	1,757	63.2%	549	19.8%	473	17.0%
Middle	2,770	49.5%	1,799	64.9%	543	19.6%	428	15.5%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,594	100.0%	3,576	63.9%	1,103	19.7%	915	16.4%

Source: www.lendingpatterns.com, 2012.

2. Minority Population

HMDA also provides the minority population percentage within each census tract. Much of Apple Valley and Victorville are made up of census tracts where 20 percent to 60 percent of the residents are minorities. Table 34 summarizes the home loan approval and denial rates of the census tracts by percentage of minority population during 2010.

In Apple Valley, approval rates were consistent throughout all of the Town's census tracts, regardless of its minority composition. In the City of Victorville, approval rates were noticeably lower for the City's majority minority tracts (44 percent) than for the rest of the City (64 percent).

Table 34: Outcomes Based on Minority Population of Census Tract (2010)								
	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
Apple Valley								
0-19% Minority	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-39% Minority	2,784	95.3%	1,786	64.7%	502	18.0%	482	17.3%
40-59% Minority	167	4.7%	106	63.5%	31	18.6%	30	18.0%
60-79% Minority	0	0.0%	0	0.0%	0	0.0%	0	0.0%
80-100% Minority	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,951	100.0%	1,892	64.1%	533	18.5%	512	17.4%
Victorville								
0-19% Minority	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-39% Minority	2,136	38.2%	1,358	63.6%	431	20.2%	347	16.3%
40-59% Minority	3,413	61.0%	2,198	64.4%	661	19.4%	554	16.2%
60-79% Minority	45	0.8%	20	44.4%	11	24.4%	14	31.1%
80-100% Minority	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5,594	100.0%	3,576	63.9%	1,103	19.7%	915	16.4%

Source: www.lendingpatterns.com, 2012.

E. Major Lenders

In 2010, the top ten mortgage lenders in the Town of Apple Valley received approximately 53 percent of lending applications; in the City of Victorville, the top lenders received about 52 percent of the total market share. Among these lenders, Wells Fargo and Bank of America received the most applications—about 27 percent of the market share in both jurisdictions. Table 35 summarizes the top lenders for 2010 in Apple Valley and Victorville as well as their underwriting outcomes.

In Apple Valley, several top lenders had significantly higher approval rates than the overall average for all lenders in the Town. Mountain West Financial, Paramount Residential Mortgage, Choice Lending Corporation, and Evergreen Moneysource Mortgage all had approval rates greater than 80 percent in 2010, 16 points higher than the overall approval rate for all lenders (64 percent). Mountain West and Paramount also had notably high approval rates in 2007. For the City of Victorville, Paramount, Choice Lending, and Flagstar Bank all had approval rates over 80 percent. All three lenders also had higher than average approval rates in 2007 as well.

In both Apple Valley and Victorville, some of the top lenders are smaller financial institutions with a history of higher than average approval rates. While high approval rates do not necessarily indicate wrongdoing by a specific institution, they can be a sign of aggressive lending practices on the part of the lender.

Table 35: Top Lenders (2007 and 2010)

	Overall Market Share		Approved		Denied		Withdrawn or Closed	
	2007	2010	2007	2010	2007	2010	2007	2010
<i>Apple Valley</i>								
Wells Fargo Bank	4.30%	17.4%	59.6%	66.5%	27.5%	18.1%	12.9%	15.4%
Bank of America	3.50%	9.6%	65.7%	62.7%	32.2%	22.5%	2.1%	14.8%
Mountain West Financial	1.50%	5.6%	82.9%	82.8%	6.7%	1.8%	10.4%	15.3%
Paramount Residential Mortgage	1.20%	4.3%	74.8%	82.0%	10.7%	7.0%	14.5%	10.9%
JP Morgan Chase Bank	1.30%	4.1%	68.1%	52.5%	26.2%	45.0%	5.7%	2.5%
Choice Lending Corp.	--	3.2%	--	89.2%	--	0.6%	--	10.1%
First Mortgage Corporation	0.50%	2.9%	62.7%	55.3%	0.0%	4.7%	37.3%	40.0%
Alaska USA Mortgage Company	--	2.1%	--	65.1%	--	4.8%	--	30.2%
Evergreen Moneysource Mortgage	--	2.1%	--	80.3%	--	1.6%	--	18.0%
Ally Bank	--	1.6%	--	39.6%	--	18.8%	--	41.7%
All Lenders	100.0%	100.0%	48.8%	64.1%	33.5%	18.5%	17.7%	17.4%
<i>Victorville</i>								
Wells Fargo Bank	3.90%	14.8%	61.7%	63.1%	22.5%	20.3%	15.8%	16.6%
Bank of America	5.50%	12.7%	68.2%	61.2%	30.5%	24.7%	1.3%	14.0%
First Mortgage Corporation	0.50%	5.0%	57.1%	54.3%	3.6%	7.6%	39.3%	38.1%
Paramount Residential Mortgage	1.00%	4.7%	68.3%	82.0%	14.4%	11.1%	17.3%	6.9%
Mountain West Financial	1.00%	3.7%	71.4%	73.6%	9.8%	6.3%	18.8%	20.2%
JP Morgan Chase Bank	1.30%	2.8%	62.0%	48.1%	29.1%	48.1%	8.9%	3.8%
Choice Lending Corp.	--	2.4%	--	82.7%	--	2.3%	--	15.0%
Prospect Mortgage, LLC	--	2.0%	--	67.9%	--	22.0%	--	10.1%
PMC Bancorp	0.60%	2.0%	71.1%	77.1%	9.9%	8.3%	19.0%	14.7%
Flagstar Bank	0.50%	1.9%	74.4%	82.1%	24.8%	17.9%	0.8%	0.0%
All Lenders	100.0%	100.0%	49.1%	63.9%	33.7%	19.7%	17.2%	16.4%

Source: www.lendingpatterns.com, 2012.

Note: The table identifies the top ten lenders of 2010. Some of these lenders were not top lenders in 2007 and market share data is not available. Furthermore, not all top lenders from 2007 are identified above. Lenders in blue were top lenders for only one of the two jurisdictions.

Under current banking regulations, lenders are required to hold a given interest rate for a borrower for a period of 60 days. Borrowers, however, are under no obligation to actually follow through on the loan during this time and can withdraw their application. In mortgage lending, fallout refers to a loan application that is withdrawn by the borrower before the loan is finalized. Typically for-profit lenders should have little fallout and none that varies by race, ethnicity or gender.

Several top lenders in the region also had higher than average rates of withdrawn or incomplete applications. A significant disparity in fallout could suggest screening, differential processing, HMDA Action misclassification and/or the potential of discouragement of minority applications.

Closed applications refer to applications that are closed by the lender due to incompleteness. In instances where a loan application is incomplete, lenders are required to send written notification to the applicant and request the missing information be turned over within a designated timeframe. If this notice is given and the applicant does not comply within the specified time, the lender can close the application for incompleteness. A high rate of incomplete loans can indicate a lack of financial literacy on the part of the borrower. Several studies have correlated financial literacy with a borrower's income level. Specifically, lower-income individuals were the least knowledgeable about finance.⁸ Insufficient lender assistance during the application process can also lead to high levels of incomplete applications. The lack of lender assistance may be discriminatory in motive or outcome, however, HMDA data cannot be used to prove motive.

In Apple Valley, during 2010, two institutions had significantly higher than average rates of withdrawn and incomplete applications – First Mortgage Corporation and Ally Bank. First Mortgage also had noticeably high rates of withdrawn and closed applications in Victorville.

Top lenders for both jurisdictions also varied significantly when comparing data based on the race/ethnicity of the applicant (Table 36). In Apple Valley, for example, Black applicants made up about four percent of the applicant pool in 2010. However, Black applicants made up larger proportions of the applicant pool for several lesser known banks. Specifically, First Mortgage Corporation (12 percent) and Mortgage Solutions of Colorado (nine percent) had substantially higher proportions of Black applicants. For Hispanics, Paramount Residential Mortgage (29 percent), Choice Lending Corporation (26 percent), and First Mortgage Corporation (24 percent) had noticeably higher proportions of Hispanic applicants than the average for all lenders (18 percent). And for Asians, Pulte Mortgage (10 percent) had a higher proportion of Asian applicants than the overall average for all lenders (four percent).

In Victorville, all five banks with the highest proportions of Black applicants were smaller, lesser known banks. DHI Mortgage Company (16 percent) and Evergreen Moneysource (13 percent), in particular, had the highest proportion of Black applicants compared to the overall average of eight percent. For Hispanics, Stearns Lending (51 percent) and Paramount Residential (51 percent) had especially high percentages of Hispanic applicants compared to the overall average of 35 percent. And, for Asians, PMC Bancorp was extremely popular. About 43 percent of all submitted loan applications to PMC were from Asian applicants, this proportion was six times greater than for all other lenders (seven percent).

⁸ Collins, Michael. "Education Levels and Mortgage Application Outcomes: Evidence of Financial Literacy." University of Wisconsin-Madison, Department of Consumer Science, (2009).

Table 36: Top Lenders by Race/Ethnicity of Applicant (2010)					
Black		Hispanic		Asian	
Lender	% of Total Applicants	Lender	% of Total Applicants	Lender	% of Total Applicants
<i>Apple Valley</i>					
First Mortgage Corporation	11.8%	Paramount Residential Mortgage	28.9%	Pulte Mortgage LLC	9.8%
Mortgage Solutions of Colorado	8.7%	Choice Lending Corp.	26.3%	Bank of America	6.0%
Evergreen Moneysource	6.6%	First Mortgage Corporation	23.5%	Quicken Loans	4.3%
Wells Fargo	5.5%	Bank of America	20.4%	JP Morgan Chase	3.3%
Citimortgage, Inc.	4.9%	Mountain West Financial	5.5%	Wells Fargo	2.7%
All Lenders	4.2%	All Lenders	17.9%	All Lenders	3.8%
<i>Victorville</i>					
DHI Mortgage Company	15.6%	Stearns Lending, Inc.	51.1%	PMC Bancorp	43.1%
Evergreen Moneysource	13.0%	Paramount Residential Mortgage	51.0%	Bank of America	10.4%
First Mortgage Corporation	11.5%	Mortgage Solutions of Colorado	41.4%	JP Morgan Chase	9.6%
Choice Lending Corp.	9.8%	Prospect Mortgage, LLC	41.3%	DHI Mortgage Company	7.8%
Golden Empire Mortgage	8.8%	Golden Empire Mortgage	41.2%	Choice Lending Corp.	6.8%
All Lenders	7.6%	All Lenders	35.4%	All Lenders	7.2%

Source: www.lendingpatterns.com, 2012.

In Apple Valley ad Victorville, minority households appeared to rely on smaller, lesser known lending institutes for mortgage financing.

While the correlation between minority applicants and smaller banks does not necessarily mean a violation of fair lending laws, it does raise concerns about the equality of access to mortgage financing. Smaller community banks often have more flexibility in their selection process and applicants with less than stellar credit and flawed financial histories may be more successful in securing mortgage financing at these smaller institutions than at larger established banks. Large banks with a strong nationwide presence, however, do have several advantages. They are closely regulated by the federal government and have a wide array of resources available to borrowers. The propensity for certain smaller banks to attract non-White applicants may indicate that access to financing, especially at larger banks, is not equal for applicants of all races/ethnicities.

F. Subprime Lending

According to the Federal Reserve, “prime” mortgages are offered to persons with excellent credit and employment history and income adequate to support the loan amount. “Subprime” loans are loans to borrowers who have less-than-perfect credit history, poor employment history, or other factors such as limited income. By providing loans to those who do not meet the critical standards for borrowers in the prime market, subprime lending can and does serve a critical role in increasing levels of homeownership. Households that are interested in buying a home but have blemishes in their credit record, insufficient credit history, or non-traditional income sources, may be otherwise unable to purchase a home. The subprime loan market offers these borrowers opportunities to obtain loans that they would be unable to realize in the prime loan market.

Subprime lenders generally offer interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. In the recent past, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating subprime loans directly. Though the subprime market usually follows the same guiding principles as the prime market, a number of specific risk factors are associated with this market. According to a joint HUD/Department of the Treasury report, subprime lending generally has the following characteristics:⁹

- **Higher Risk:** Lenders experience higher loan defaults and losses by subprime borrowers than by prime borrowers.
- **Lower Loan Amounts:** On average, loans in the subprime mortgage market are smaller than loans in the prime market.

⁹ U.S. Department of Housing and Urban Development. *Unequal Burden In Los Angeles: Income and Racial Disparities in Subprime Lending*. April 2000.

- **Higher Costs to Originate:** Subprime loans may be more costly to originate than prime loans since they often require additional review of credit history, a higher rate of rejected or withdrawn applications and fixed costs such as appraisals, that represent a higher percentage of a smaller loan.
- **Faster Prepayments:** Subprime mortgages tend to be prepaid at a much faster rate than prime mortgages.
- **Higher Fees:** Subprime loans tend to have significantly higher fees due to the factors listed above.

Subprime lending can both impede and extend fair housing choice. On the one hand, subprime loans extend credit to borrowers who potentially could not otherwise finance housing. The increased access to credit by previously underserved consumers and communities contributed to record high levels of homeownership among minorities and lower income groups. On the other hand, these loans left many lower income and minority borrowers exposed to default and foreclosure risk. Since foreclosures destabilize neighborhoods and subprime borrowers are often from lower income and minority areas, mounting evidence suggests that classes protected by fair housing faced the brunt of the recent subprime and mortgage lending market collapse.¹⁰

While HMDA data does not classify loans as subprime, it does track the interest rate spread on loans. An interest rate spread refers to the difference between two related interest rates. For HMDA data, spread specifically refers to the difference between the annual percentage rate (APR) for a loan and the yield on a comparable-maturity Treasury security. In 2005, the Federal Reserve Board required lenders to report rate spreads for loans whose APR was above the Treasury benchmark. Loans with a reported spread are typically referred to as higher-priced or subprime loans.

Table 37: Reported Spread on Loans by Race/Ethnicity				
	Frequency of Spread		Average Spread	
	2007	2010	2007	2010
<i>Apple Valley</i>				
White	19.93%	3.69%	4.46	2.30
Black	34.57%	3.23%	5.02	5.49
Hispanic	30.72%	7.38%	4.63	2.76
Asian	16.82%	5.00%	4.48	1.62
<i>Victorville</i>				
White	21.52%	3.89%	4.63	1.94
Black	32.45%	3.24%	4.80	1.64
Hispanic	28.78%	5.02%	4.62	1.91
Asian	17.79%	1.60%	4.00	1.71

Source: www.lendingpatterns.com, 2012.

¹⁰ Foreclosure Exposure: A Study of Racial and Income Disparities in Home Mortgage Lending in 172 American Cities. Association of Community Organizations for Reform Now. September 2007.

The frequency of loans with reported spread has decreased substantially since 2007. About one in every five loans in 2007 had a reported spread, but by 2010, only a very small fraction of loans reported a spread. While the proportion of loans with a reported spread was high overall in 2007, it should be noted that the frequency of these types of loans was the highest for Blacks and Hispanics in both jurisdictions.

In Apple Valley, about one-third of Black and Hispanic applicants received a subprime loan, compared to less than 20 percent of White and Asian applicants. In Victorville, 32 percent of Black applicants received a subprime loan in 2007. Hispanics in Victorville fared a bit better – about 29 percent of Hispanic applicants received a subprime loan – but not as well as White and Asian applicants who received the lowest proportion of subprime loans.

In addition to the frequency of loans with reported spread, it is also important to look at the magnitude of the reported spread. Since 2007, the magnitude of spread reported has decreased substantially in both jurisdictions. However, there were still disparities in the severity of the spread based on the race/ethnicity of the applicant. In 2010, the average spread for Black applicants in Apple Valley was 5.49, an increase from the average spread reported for Blacks in 2007. The average reported spread for every other race/ethnic group in Apple Valley dropped significantly from 2007 to 2010.

Average loan spread for all groups have decreased since 2007 for both Apple Valley and Victorville, except for Black applicants in Apple Valley. The average loan spread for Black applicants in Apple Valley not only sustained at a high level in 2010, it actually increased from that in 2007.

Predatory Lending

With an active housing market, potential predatory lending practices by financial institutions may arise. Predatory lending involves abusive loan practices usually targeting minority applicants or those with less-than-perfect credit histories. The predatory practices typically include higher fees, hidden costs, and unnecessary insurance and larger repayments due in later years. One of the most common predatory lending practices is placing borrowers into higher interest rate loans than called for by their credit status. Although the borrowers may be eligible for a loan in the “prime” market, they are directed into more expensive and higher fee loans in the “subprime” market. In the other cases, fraudulent appraisal data is used to mislead homebuyers into purchasing over-valued homes, or misrepresented financial data is used to encourage homebuyers into assuming a larger loan than can be afforded. Both cases almost inevitably result in foreclosure.

In recent years, predatory lending has also penetrated the home improvement financing market. Seniors and minority homeowners are typically the targets of this type of lending. In general, home improvement financing is more difficult to obtain than home purchase financing. Many homeowners have a debt-to-income ratio that is too high to qualify for home improvement loans in the prime market and become targets of predatory lending in the subprime market. Seniors have been swindled into installing unnecessary devices or making unnecessary improvements that are bundled with unreasonable financing terms.

Predatory lending is a growing fair housing issue. Predatory lenders who discriminate get some scrutiny under the Fair Housing Act of 1968, which requires equal treatment in terms and

conditions of housing opportunities and credit regardless of race, religion, color, national origin, family status, or disability. This applies to loan originators as well as the secondary market. The Equal Credit Opportunity Act of 1972 requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age, sex, and marital status. Lenders that engage in predatory lending would violate these Acts if they target minority or elderly households to buy at higher prices and unequal loan products, treat loans for protected classes differently than those of comparably credit-worthy White applicants, or have policies or practices that have a disproportionate effect on the protected classes.

Data available to investigate the presence of predatory lending is extremely limited. At present, HMDA data are the most comprehensive data available for evaluating lending practices. However, as discussed before, HMDA data lack the financial details of the loan terms to conclude that any kind of predatory lending has actually occurred. There is an effort at the national level to push for increased reporting requirements in order to identify and curb predatory lending.

The State of California has enacted additional measures designed to stem the tide of predatory lending practices. A law (Senate Bill 537) signed by Governor Gray Davis provided a new funding mechanism for local district attorneys' offices to establish special units to investigate and prosecute real estate fraud cases. The law enabled county governments to establish real estate fraud protection units. Furthermore, Governor Davis signed AB 489 in October 2001, a predatory lending reform bill. The law prevents a lender from basing the loan strictly on the borrower's home equity as opposed to the ability to repay the loan. The law also outlaws some balloon payments and prevents refinancing unless it results in an identifiable benefit to the borrower.

Predatory lending and unsound investment practices, central to the current home foreclosure crisis, are resulting in a credit crunch that has spread well beyond the housing market, now impacting the cost of credit for local government borrowing and local property tax revenues. In response, the U.S. House of Representatives passed legislation H.R.3915 in 2007, which would prohibit certain predatory lending practices and make it easier for consumers to renegotiate predatory mortgage loans. The U.S. Senate introduced similar legislation in late 2007 (S.2454). The Mortgage Reform and Anti-Predatory Lending Act (H.R.1728) was passed in the House in May 2009 and amends the Truth in Lending Act to specify duty of care standards for originators of residential mortgages. The law also prescribed minimum standards for residential mortgage loans and directs the Secretary of Housing and Urban Development (HUD) to establish a grants program to provide legal assistance to low and moderate income homeowners and tenants and prohibits specified practices, including:

- Certain prepayment penalties;
- Single premium credit insurance;
- Mandatory arbitration (except reverse mortgages);
- Mortgage loan provisions that waive a statutory cause of action by the consumer; and

- Mortgages with negative amortization.¹¹

In addition to anti-predatory lending laws, the Mortgage Forgiveness Debt Relief Act was enacted in 2007 and allows for the exclusion of income realized as a result of modification of the terms of a mortgage or foreclosure on a taxpayer's principal residence.

While subprime lending cannot in and of itself be described as "predatory," studies have shown a high incidence of predatory lending in the subprime market.¹² Unlike in the prime lending market, overly high approval rates in the subprime market is a potential cause for concern when the target clients are considered high risk. High approval rates may indicate aggressive lending practices. Table 35 summarizes the approval rates of top lenders in Apple Valley and Victorville. Of these top lenders, Mountain West Financial, Paramount Residential Mortgage, Choice Lending Corporation, Evergreen Moneysource Mortgage, and Flagstar Bank had notably high approval rates (over 80 percent).

G. Purchased Loans

Secondary mortgage marketing is the term used for pricing, buying, selling, securitizing and trading residential mortgages. The secondary market is an informal process of different financial institutions buying and selling home mortgages. The secondary market exists to provide a venue for lending institutions to raise the capital required to make additional loans.

1. History

In the 1960s, as interest rates became unstable, housing starts declined and the nation faced capital shortages as many regions, including California, had more demand for mortgage credit than the lenders could fund. The need for new sources of capital promoted Congress to reorganize the Federal National Mortgage Association (FNMA) into two entities: a private corporation (today's FNMA) and a government agency, the Government National Mortgage Association (GNMA). In 1970, Congress chartered the Federal Home Loan Mortgage Corporation (FHLMC) to purchase conventional loans. Both FHLMC and FNMA have the same goals: to increase the liquidity of the mortgage market and make homeownership more widely available to the average citizen. The two organizations work to standardize the documentation, underwriting and financing of home loans nationwide. They purchased loans from originators, hold them and issue their own debt to replenish the cash. They are, essentially, very large, massive savings and loan organizations. These two organizations set the standards for the purchase of home loans by private lenders in the U.S.

¹¹ *In negative amortization, a borrower pays monthly mortgage payments that are lower than the required interest payments and include no principal payments. The shortage in monthly payments is added to the principle loan. Therefore, the longer the borrower holds that loan, the more they owe the lender despite making monthly payments.*

¹² *Stolen Wealth, Inequities in California's Subprime Mortgage Market. California Reinvestment Committee. November 2001.*

2. Fair Housing Concerns

During the peak of the housing market, the practice of selling mortgage loans by the originators (lenders that initially provided the loans to the borrowers) to other lenders and investors was prevalent. Predatory lending was rampant, with lenders utilizing liberal underwriting criteria or falsified documents to push loan sales to people who could not afford the loans. The originating lenders were able to minimize their financial risk by immediately selling the loans to other lenders or investors on the secondary market.

Table 38 shows the various loan types purchased in Apple Valley and Victorville, as well as the race/ethnicity of the applicants in 2010. For conventional home purchase loans, White applicants were the least likely to have their loans purchased.

Table 38: Percent of Purchased Loans by Race (2010)				
Loan Type	White	Black	Asian	Hispanic
<i>Apple Valley</i>				
Government-Backed Purchase	71.0%	48.5%	100.0%	69.9%
Conventional Purchase	24.1%	36.4%	37.5%	26.3%
Refinance	30.1%	35.3%	19.0%	26.0%
Home Improvement	15.4%	0.0%	0.0%	0.0%
<i>Victorville</i>				
Government-Backed Purchase	68.1%	69.3%	55.8%	76.7%
Conventional Purchase	27.8%	32.0%	29.9%	36.8%
Refinance	36.6%	32.4%	18.2%	46.1%
Home Improvement	13.0%	0.0%	0.0%	14.3%

Source: www.lendingpatterns.com, 2012.

H. Review of Lending Patterns by Specific Lender

Because the applicant profiles of some of the top lenders in Apple Valley and Victorville differ so significantly, this section looks at the underwriting outcomes of some of the major lenders in both jurisdictions.

Wells Fargo

Wells Fargo was the top lender for both jurisdictions in 2010 capturing 17 percent of the market share in Apple Valley and 15 percent of the market share in Victorville. The overall approval rates for this institution (67 percent in Apple Valley and 63 percent in Victorville) were on par with the average for all lenders. And, the underwriting outcomes for this particular lender did not reveal much disparity in approval, denial or fallout rates based on the race/ethnicity of the applicant.

During 2010, among all Wells Fargo applicants in Apple Valley, Hispanics had the highest approval rate at 65 percent; Hispanics also had the lowest denial rate at 12 percent. In Victorville, approval rates for most race/ethnic groups were consistent at about 60 percent,

however, Black applicants had a noticeably lower approval rate (44 percent). Fallout was high (at around 25 percent) for both jurisdictions, but was consistent across all racial/ethnic categories.

Bank of America

Bank of America was the second most prolific lender in the region behind Wells Fargo. During 2010, Bank of America had 10 percent of the market share in Apple Valley and 13 percent of the market share in Victorville. The overall approval rates for this institution (63 percent in Apple Valley and 61 percent in Victorville) were on par with the average for all lenders.

In Apple Valley, Hispanics again had the highest approval rate (76 percent) with this lender. Blacks and Asians had conspicuously low approval rates, high denial rates and high fallout rates with Bank of America. However, it is important to note that there were very few applicants of either race (two Black applicants and seven Asian applicants) in 2010, making it difficult to come to any sort of conclusion based solely on these statistics. In Victorville, Blacks (46 percent) and Hispanics (54 percent) had noticeably lower approval rates than White and Asian applicants in 2010. Black and Hispanic applicants also had the highest denial rates of all racial/ethnic groups.

First Mortgage Corporation

Founded in 1975, First Mortgage Corporation (FMC) is an independent residential Mortgage Banking firm headquartered in Ontario, California. In 2010, FMC captured just under three percent of the market share in Apple Valley and five percent of the market share in Victorville. While FMC was not as prolific as Wells Fargo or Bank of America in the region, this institution was identified in Table 36 as a lender with a higher than average percentage of Black and Hispanic applicants, compared to all other lenders in the area. The overall approval rates for this institution (55 percent in Apple Valley and 54 percent in Victorville) were lower than the average for all lenders.

In reviewing the underwriting outcomes for this particular lender, some variation in approval rates can be seen based on the race/ethnicity of the applicant. In Apple Valley, Blacks, in particular, had a substantially lower loan approval rate than Whites and Hispanics (40 percent versus 60 percent and 65 percent, respectively); however, the small pool of Black applicants makes it difficult to determine any real pattern of disparity. FMC did also have a significant proportion of applications classified as fallout. Thirty percent of applications from Hispanic applicants and 38 percent of applications from White applicants were classified as fallouts. By contrast, 60 percent of applications from Black applicants were fallouts—in fact, more Black applicants were classified as fallouts than were approved for loans. In Victorville, Black applicants had an approval rate (41 percent) nearly 20 points lower than White applicants (59 percent). One-half of Black applicants were also classified as fallouts. These statistics are particularly significant because FMC is the top lender for Blacks in Apple Valley and third most popular lender for Blacks in Victorville.

This lender shows a high fallout rate for Black households.

PMC Bancorp

PMC Bancorp is a full service wholesale mortgage banker established in 1998 and headquartered in the City of Industry. During 2010, PMC was not particularly active in the region with just two percent of the market share in Victorville; PMC was not considered a top lender in Apple Valley. PMC was identified in Table 36 as a lender with a higher than average proportion of Asian applicants, compared to all other lenders in the City of Victorville. Specifically, approximately 43 percent of applications to PMC were submitted by Asian applicants in 2010, compared to just seven percent for all other lenders in the City.

The overall approval rate for this institution (77 percent in Victorville) was significantly higher than the average for all lenders. During 2010, approval rates for this specific lender were the highest for White and Asian applicants (65 percent for both) and noticeably lower for Blacks and Hispanics (50 percent and 44 percent, respectively). Black and Hispanics also had higher rates of fallout than White and Asian applicants.

Asians and White households show significantly higher approval rates than Hispanic and Black households.

Paramount Residential Mortgage

Paramount Residential Mortgage Group (PRMG) is a privately held mortgage banker and residential home lender based in Corona, California. They were the fourth most active lender in both Apple Valley and Victorville, with about four percent of the market share in Apple Valley and five percent of the market share in Victorville. PRMG was also identified in Table 36 as a lender with a higher than average percentage of Hispanic applicants, compared to all other lenders.

The overall approval rate for this institution (82 percent in both jurisdictions) was much higher than the average for all lenders. In 2010, for the Town of Apple Valley, Hispanics and Whites comprised a vast majority of this lender's applicant pool. Approval, denial, and fallout rates did not vary significantly based on the applicant's race/ethnicity. However, in the City of Victorville, during 2010, approval rates for this specific lender were very high for Hispanic applicants (80 percent). Fallout rates for Hispanics (11 percent) was also the lowest—in fact, the fallout rates for applicants of all other race/ethnic groups was at least twice as high.

The approval rate for this lender was significantly higher than the average rate for all lenders.

I. Foreclosures

Foreclosure occurs when households 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. If 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 homeowners 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.

Statewide, the number of foreclosures in 2011 declined substantially from the previous year. During the fourth quarter of 2011, a total of 4,827 Notices of Default (NODs) were recorded in San Bernardino County, a decrease of 16 percent from the fourth quarter of 2010.

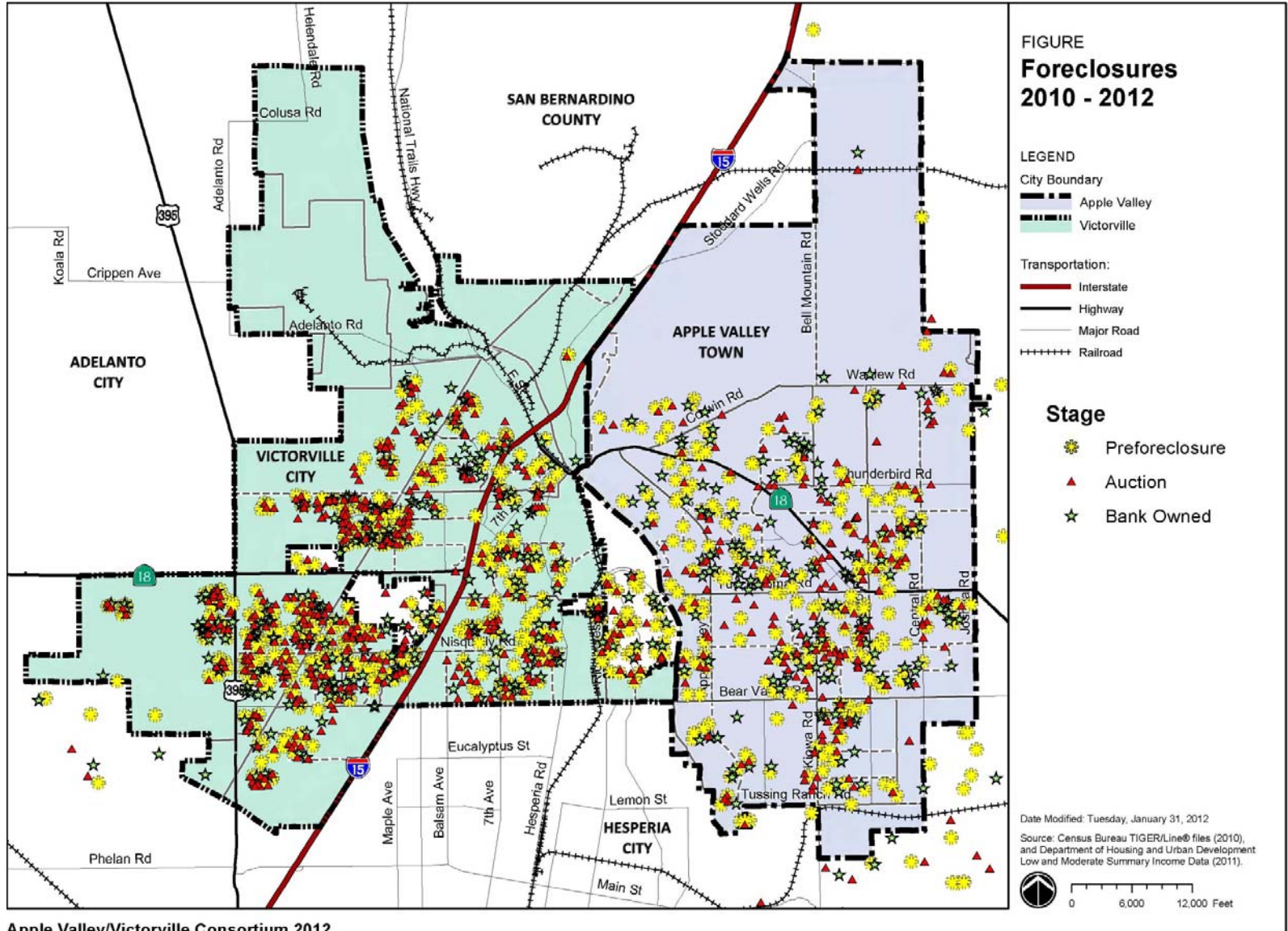
Figure 8 illustrates the location of all the properties within the Town of Apple Valley and the City of Victorville that were in the foreclosure process as of January 2012. The foreclosed properties were fairly evenly distributed throughout both jurisdictions, but dense clusters of foreclosures can be seen around Nisqually Road in Victorville and just north of Highway 18 in the Town of Apple Valley.

Homes can be in various stages of foreclosure. Typically, the foreclosure process begins with the issuance of a Notice of Default (NOD). An NOD serves as an official notification to a borrower that he or she is behind in their mortgage payments, and if the payments are not paid up, the lender will seize the home. In California, lenders will not usually file an NOD until a borrower is at least 90 days behind in making payments. As of January 2012, 268 properties in Apple Valley and 512 properties in Victorville were in this pre-foreclosure stage.

Once an NOD has been filed, borrowers are given a specific time period, typically three months, in which they can bring their mortgage payments current. If payments are not made current at the end of this specified time period, a Notice of Trustee Sale (NTS) will be prepared and published in a newspaper. An NTS is a formal notification of the sale of a foreclosure property. In California, the NTS is filed 90 days following an NOD when a property owner has failed to make a property loan current. Once an NTS has been filed, a property can then be sold at public auction. According to foreclosure records, 241 properties in Apple Valley and 455 properties in Victorville were in the auction stage of the foreclosure process.

Many properties, however, are unable to be sold at public auction. In the event of an unsuccessful sale at auction, a property becomes classified as Real Estate Owned (REO) and ownership of it reverts back to the mortgage company or lender. In January 2012, the Town of Apple Valley had a total of 165 bank-owned properties and the City of Victorville had a total of 293 bank-owned properties.

Figure 8: Foreclosures



Chapter 5: Public Policies

Public policies established at the regional and local levels can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Public policies refer to land use regulations, housing policies, transit accessibility, and other factors that impact housing in Apple Valley and Victorville. Fair housing laws are designed to encourage an inclusive living environment and thus require a community to analyze governmental regulations that may impede fair housing opportunity. This section reviews the General Plan, Housing Element, Development Code, Consolidated Plan, Fair Housing Plan, and other documents of the two jurisdictions to assess governmental policies and regulations that may impact fair housing choice.

A. Policies and Programs Affecting Housing Development

The General Plan of a community sets forth various policies regarding land uses, the need to provide appropriate infrastructure and public services (e.g., transportation, public safety, etc.), to ensure the economic vitality of the community, and preserve the unique living environment, particularly the diverse housing. Two of the seven State-mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Development Code, which implements the Land Use Element, is another important document that influences the amount and type of housing available in a community – the availability of housing choice. This section highlights aspects of these documents that affect the provision of housing in Apple Valley and Victorville.

1. Housing Element Law and Compliance

The Housing Element is the seminal document governing housing policy in the Town of Apple Valley and City of Victorville. The Housing Element sets forth goals, policies and programs to encourage the maintenance, improvement, and production of housing. The Housing Element must be reviewed by the State Department of Housing and Community Development (HCD) for compliance with State laws.

Housing Element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for and do not unduly constrain housing development. Specifically, the Housing Element must:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the community's housing goals;
- Assist in the development of adequate housing to meet the needs of lower and moderate income households;

- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

Compliance Status

A Housing Element found by HCD to be in compliance with State law is presumed to have adequately addressed its policy constraints. The Town of Apple Valley's adopted Housing Element was found to be in compliance by HCD on September 15, 2009. The City of Victorville's adopted Housing Element was found to be in compliance by HCD on January 28, 2011.

2. Land Use Element of the General Plan

The Land Use Element of a General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community. Residential development is implemented through the zoning districts and development standards specified in the jurisdiction's Development Code.

The Town of Apple Valley's General Plan has eight primary land use designations that permit residential uses. Together with implementation measures in the Development Code, the Land Use Element establishes the types of residential uses permitted in Apple Valley. Table 39 describes the Town's major land use designations, corresponding residential densities, and types of housing allowed in each district.

Table 39: Residential Land Use Categories in Apple Valley

General Plan Land Use Designation	Density (du/acre)	Residential Type
Very Low Density Residential (R-VLD)	1 dwelling unit per 5 or more gross acres	This land use designation allows detached single family homes on lots of at least five gross acres. Also permitted are agricultural and ranching activities, animal keeping (both personal use and commercial) and home occupations.
Low Density Residential (R-LD)	1 dwelling unit per 2.5 to 5 gross acres	This land use designation allows detached single family homes on lots of two and a half to five gross acres. This designation provides for the rural and suburban environment. Also permitted are agricultural and ranching activities, animal keeping (both personal use and commercial) and home occupations.
Estate Residential (R-E)	1 dwelling unit per 1 to 2.5 gross acres	This land use designation allows detached single family homes on lots of one to two and a half gross acres. Access on local roads in new subdivisions within this designation should be paved. Animal keeping for personal use, ranching activities and home occupations are appropriate land uses in this designation.
Estate Residential $\frac{3}{4}$ (R-E)	1 dwelling unit per 0.75 to 1.0 net acre	This land use designation is specifically designed for animal keeping. Animal keeping for personal use, ranching activities and home occupations are appropriate land uses in this designation. Centralized stables, corrals, show rings and similar facilities, available to all residents of a development project are encouraged.
Single Family Residential (R-SF)	1 dwelling unit per 0.4 to 0.9 net acre	Lots in this designation must be a minimum of 18,000 square feet net, and may range to 39,200 square feet. This designation is intended to be composed of planned subdivisions with all utilities and public services. Animal keeping is permitted on lots zoned Equestrian Residential in the Development Code.
Medium Density Residential (R-M)	4.0-20.0	This designation is intended to promote a wide range of higher density residential units, including: single family attached; and multi-family units, including condominiums, townhomes and apartments. This land use designation should be a buffer between less intense residential designations and commercial or industrial designations, or major roadways. Future projects should be located in close proximity to commercial services, public transit and schools.
Mobile Home Park (MHP)	5.0-15.0	This designation is applied to mobile home parks that existed upon adoption of this General Plan. New mobile home parks would be required to file a General Plan Amendment and Change of Zone to assign this designation to the project. This designation applies to mobile home parks and mobile home subdivisions.
Mixed Use (M-U)	4.0-30.0	The land use designation has been created to allow for the development of projects that include residential and retail and office commercial development in an integrated, master planned project. Residential development should occur over commercial development, or within a commercial complex (i.e., residential building abutting a commercial building).

Source: Town of Apple Valley, Land Use Element, 2009.

The City of Victorville’s General Plan has six primary land use designations that permit residential uses. Table 40 describes the City’s major land use designations, corresponding residential densities, and types of housing allowed in each district.

Table 40: Residential Land Use Categories in Victorville		
General Plan Land Use Designation	Density (du/acre)	Residential Type
Very Low Residential (VLR)	2.0	This category of residential land use is characterized by single-family detached homes located on lots with a minimum area of one half acre which allows for a maximum density of two dwelling units per acre.
Low Density Residential (LDR)	5.0	This residential land use category is characterized by single-family detached residential development.
Medium Density Residential (MEDR)	8.0-12.0	Residential development in this category is typified by attached townhome units or garden type multifamily development.
High Density Residential (HDR)	12.0-20.0	Residential development in the High Density Residential land use category corresponds to multiple family development, characterized by apartments and condominiums.
Mixed Density (MDR)	1.0-15.0	This Mixed Density Residential land use category is intended to facilitate single-family infill development in the event that extraordinary developmental constraints, such as a lack of required sewer infrastructure, make the continued development of the permitted high-density uses impractical or infeasible. Residential development in the Mixed Density Residential land use category ranges from single-family detached units to multi-family attached units, such as apartments. The MDR (Mixed Density Residential) zone district corresponds to this General Plan land use designation.
Mixed-Use (MU)	60.0	This Mixed-Use High Density Residential land use category is intended to facilitate well integrated multi-family and commercial developments, located adjacent to retail development. Permitted mix of uses multi-family residential up to a density of 60 du/ac; retail, office, civic, open space and other similar uses as defined through the PUD process.

Source: City of Victorville, *Land Use Element*, 2009.

A number of factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce developments costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. Minimum required densities in multi-family zones ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for multi-family uses.

Apple Valley’s Land Use Element includes two zones (Medium Density Residential and Mixed Use) that allow for high-density residential uses (over 20 units per acre). The Town has established minimum required densities in these zones to ensure development of multiple-family residential units. Furthermore, Apple Valley prohibits single-family development on all lands designated Medium Density Residential within Town limits, with the following exceptions: 1) Projects restricted to senior citizens (age 55 and older) and providing various levels of care; and 2) Lots of 18,000 square feet or greater in the Mountain Vista Estates area. Victorville’s Land Use Element includes two zones (High Density Residential and Mixed-Use) that allow for high-density residential uses (over 20 units per acre). The City has established minimum required densities in these zones to ensure development of multiple-family residential units.

3. Development Code

The Development Code implements the General Plan by establishing zoning districts that correspond with General Plan land use designations. Development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare (Government Code, Sections 65800-65863). Several aspects of the Development Code that may affect a person’s access to housing or limit the range of housing choices available are described below.

Definition of Family

A community’s Development Code can potentially restrict access to housing for households failing to qualify as a “family” by the definition specified in the Development Code. For instance, a landlord may refuse to rent to a “nontraditional” family based on the zoning definition of a family. A landlord may also use the definition of a family as an excuse for refusing to rent to a household based on other hidden reasons, such as household size. Even if the code provides a broad definition, deciding what constitutes a “family” should be avoided by jurisdictions to prevent confusion or give the impression of restrictiveness.

California court cases¹³ have ruled that a definition of “family” that: (1) limits the number of persons in a family; (2) specifies how members of the family are related (i.e., by blood, marriage or adoption, etc.); or (3) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution. A Development Code also cannot regulate residency by discrimination between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family.

The Town of Apple Valley Development Code defines a “family” as “one or more individuals occupying a dwelling unit as a single household unit.” This definition of family is all encompassing and therefore does not present any fair housing concerns.

¹³ *City of Santa Barbara v. Adamson (1980), City of Chula Vista v. Pagard (1981), among others.*

Victorville: The City of Victorville Development Code does not include a definition of family and therefore does not present any fair housing concerns.

Definition of Disability

Persons with disabilities may have restricted access to housing if a Development Code's definition for "disability" or "handicap" is inconsistent with the Federal Fair Housing Act (FFHA). The FFHA defines "handicap" as: "with respect to a person –

- A physical or mental impairment which substantially limits one or more of such person's major life activities;
- A record of having such an impairment; or
- Being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802))."

The Town of Apple Valley and the City of Victorville do not specifically define disability in their Development Codes. In this case, implementation of the Development Codes will defer to the appropriate governing legislation for definitions.

Density Bonus

Under the provisions of Section 65915 of the California Government Code, when a developer agrees to provide a certain percentage of units as affordable to various income households or for senior housing, the jurisdiction is required to grant certain specified concessions to the developer if they meet at least one of the following requirements:

- Provide at least ten percent (10%) of the total units of the housing development for lower income households, as defined in Health and Safety Code Section 50079.5; or
- Provide at least five percent (5%) of the total units of the housing development for very low income households, as defined in Health and Safety Code section 50105; or
- Provide a senior citizen housing development as defined in Civil Code Sections 51.3 and 51.12, or mobile home park that limits residency based on age requirements for housing for older persons pursuant to Civil Code Sections 798.76 and 799.5; or
- Provide at least ten (10%) of the total dwelling units in a common interest development as defined in Civil Code Section 1351 for persons and families of moderate income, as defined in Section 50093 of the Health and Safety Code, provided that all units in the development are offered to the public for purchase.

Both the Town of Apple Valley and City of Victorville have updated their Development Codes to be consistent with State law.

Parking Requirements

Parking standards are critical to encourage circulation by modes other than automobiles, prevent traffic congestion caused by shortage of parking spaces, to maximize efficiency, protect the public safety, provide for the special needs of the physically handicapped, and, where appropriate, insulate surrounding land uses from their impact. Parking standards are designed to ensure that sufficient on-site spaces are available to accommodate vehicle ownership rates of residents, the needs of the businesses, and the actual parking required for special needs housing, while encouraging use of other modes.

Communities that require an especially high number of parking spaces per dwelling unit can negatively impact the feasibility of producing affordable housing or housing for special needs groups by reducing the achievable number of dwelling units per acre, increasing development costs, and thus restricting the range of housing types constructed in a community. Typically, the concern for high parking requirements is limited to multi-family, affordable, or senior housing.

Table 41 sets forth the general standards for off-site parking space requirements for the Town of Apple Valley. Apple Valley is primarily a commuter town and therefore adequate parking is an essential element of residential development. Given the abundance of land relative to other more urbanized communities in the Greater Los Angeles and Inland Empire areas, the Town's parking requirements do not constrain residential development. Apple Valley encourages the development of housing for the elderly by offering incentives, including reductions in parking requirements. Furthermore, the Town has no special or more restrictive parking requirements for any and all housing types that serve persons with disabilities. Because of this flexibility, parking is not considered an impediment to the development of housing and special needs housing.

Table 41: Apple Valley Parking Standards	
Residential Use	Basic Requirement
Single family detached and duplex	2 car enclosed garage per unit
Mobile home parks	2 covered spaces per site
Boarding houses, dormitories and similar uses	1 space per sleeping room or 1 space per bed, whichever is greater
Multi-family and single family attached	
Studios	1 covered space per unit and 1 open space per unit
One and two bedrooms	2 enclosed spaces per unit and 0.50 uncovered guest spaces per unit
Three or more bedrooms	2 enclosed spaces per unit, one uncovered space per unit and 0.50 uncovered guest spaces per unit
Multi-family and single family attached (Mountain Vista Estates area only)	
Studios	1 covered space per unit
One and two bedrooms	1 enclosed space per unit and 1 uncovered space per unit
Three or more bedrooms	2 enclosed spaces per unit and one uncovered space per unit

Source: Town of Apple Valley, Development Code, 2011.

Table 42 sets forth the general standards for off-site parking space requirements for the City of Victorville. Victorville’s Development Code currently requires two parking spaces per unit for multi-family development, with one-half of those required to be covered. There is no requirement for guest parking and no differentiation based on the number of bedrooms. This standard does not appear to be a hindrance to affordable development and often results in fewer required spaces than other jurisdictions.

Table 42: Victorville Parking Standards		
Residential Use	Basic Requirement	Additional Parking or Parking Credit
Single-family residence	2 spaces within an enclosed garage	n/a
Mobile home within the R-MPD district	2 spaces which may be tandem within a garage, carport or awning	n/a
Residential caretaking unit	Per Conditional Use Permit	n/a
Boardinghouse	1 space per sleeping room	3 additional spaces
Condominium or town house	2 covered spaces per unit (1 space for one bedroom units)	1 uncovered space per 2 units
Mobile Home Park	2 adjoining spaces per unit which may be tandem	1 space per 5 units
Multi-Family Residences	2 spaces per unit - 1 space shall be covered	n/a

Source: City of Victorville, Development Code, 2011.

Variety of Housing Opportunity

To ensure fair housing choice in a community, a Development Code should provide for a range of housing types, including single-family, multi-family, second dwelling units, mobile and manufactured homes, licensed residential care facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Table 43 and Table 44 provide a summary of the Development Codes of Apple Valley and Victorville as they relate to ensuring the provision of a variety of housing opportunities.

The City of Victorville has made commitments in their Housing Element to address the provision of housing for special needs groups.

Table 43: Variety of Housing Opportunity in Apple Valley

Residential Use	Residential Zoning Districts											
	R-VLD	R-A	R-LD	R-E	R-E ¾	R-EQ	R-SF	R-M	MH P	M-U	PRD	C-S
Single-family	P	P	P	P	P	P	P	P	C	P	P	
Multi-family								P		P	P	
Factory Built/Mobile Homes	P	P	P	P	P	P	P	P	P		P	
Second Units	S	S	S	S	S	S	S				S	
Residential Care, 6 or less	P	P	P	P	P	P	P	P	P	P	P	
Residential Care, 7 or more	C	C	C	C	C	C	C	C	C	C	C	
Emergency Shelter												S
Supportive Housing	C	C	C	C	C	C	C	C	C	C	C	
Transitional Housing	C	C	C	C	C	C	C	C	C	C	C	
Single-Room Occupancy	C	C	C	C	C	C	C	C	C	C	C	

Source: Town of Apple Valley, Development Code, 2011.

P = Permitted by right

C = Conditional Use Permit

S = Special Use Permit

Table 44: Variety of Housing Opportunity in Victorville

Residential Use	Residential Zoning Districts											
	AE	A	SR	R1	R2	R3	R4	M DR	RM PD	C1	C2/C4	PC
Single-family	P	P	P	P				P	P			
Multi-family (8 units/acre)					P	P	P	P				
Multi-family (15 units/acre)						P	P	P				
Multi-family (20 units/acre)							P					
Factory Built/Mobile Homes	P	P	P	P				P	P			
Mobilehome Park					C	C	C					
Condominiums				C	C	C	C	C				
Affordable Senior Housing												
Residential Care, 6 or less		P	P	P				P	P			
Emergency Shelter					C	C	C	C		C		C
Single-Room Occupancy						C	C	C			C	

Source: City of Victorville, Development Code, 2011.

P = Permitted by right

C = Conditional Use Permit

Single- and Multi-Family Uses

Single- and multi-family housing types include detached and attached single-family homes, duplexes or half-plexes, townhomes, condominiums, and apartments. Development Codes should specify the zones in which each of these uses would be permitted. Apple Valley and Victorville can accommodate the range of residential uses described above without a conditional use permit.

Development Codes should also avoid “pyramid or cumulative zoning” (e.g., permitting lower-density single-family uses in zones intended for higher density multi-family uses). Pyramid or cumulative zoning could limit the amount of lower-cost multi-family residential uses in a community and be a potential impediment to fair housing choice. Apple Valley allows single-family residential uses in multi-family zones only in the Mountain Vista neighborhood.

Second Dwelling Units

Second units are detached dwelling units that provide complete independent living facilities for one or more persons on the same parcel as a legal single-family residence. Second units offer several benefits. First, they typically rent for less than apartments of comparable size, and can offer affordable rental options for seniors, college students, single persons, and extended families. Second, the primary homeowner receives supplementary income by renting out a second unit, which can help many modest income and elderly homeowners remain in or afford their homes.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which second units are permitted. Second units cannot be prohibited in residential zones unless a local jurisdiction establishes that such action may limit housing opportunities in the region and finds that second units would adversely affect the public health, safety, and welfare in residential zones. The State’s second unit law was amended in September 2002 to require use of a ministerial, rather than discretionary, process for reviewing and approving second units. A ministerial process is intended to reduce permit processing time frames and development costs because proposed second units that are in compliance with local zoning standards can be approved without a public hearing.

In 2004, the Town of Apple Valley adopted the State’s model ordinance for second unit development, in order to facilitate the development of such units on single family lots. The ordinance allows second units, consistent with state law, on single family lots, as long as the development standards in the zone are met.

In the City of Victorville, second units are governed by Section 18.13.040 of the Victorville Development Code, which defines second units as a detached or attached dwelling unit which provides complete, independent living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation, on the same parcel as is situated the primary unit. The Development Code prohibits second units for the following reasons:

- a) Additional units on residential lots generate the need for additional off-street parking. Many areas of the City are presently impacted by a lack of adequate off-street parking, resulting in the use of the public right-of-way for parking purposes. The efficiency of public rights-of-way as transportation corridors lessens proportionate to the increase of their use for parking. Drivers entering, and exiting their vehicles cause a reduction in through traffic speeds, as well as constituting a safety hazard.
- b) The City General Plan specifies certain maximum densities for residential areas. Many areas within the City have been, and are being developed to maximum density in order to attain the most intensive land use allowed. The introduction of

second units to existing residential areas could increase densities beyond the intent of the General Plan and corresponding zone classification, changing the character of the neighborhood to the detriment of its residents.

- c) The City acknowledges that the preclusion of second units within the City may limit housing opportunities of the region. This limitation is justified, based on concerns for neighborhood preservation. Moreover, the City participates in federally assisted housing programs and has accepted a share of the regional housing need allocation. Also, the City has adopted ordinances that provide for discretionary relief from restrictions that increase the cost of housing. These ordinances, combined with the low cost of land and construction labor in the City, create a favorable environment for the development of affordable rental and owner-occupied housing. Because of these mitigating factors, the preclusion of second units will not significantly affect housing opportunities in the region.

Mobile Home Parks

The Town of Apple Valley's Development Code allows mobile homes and manufactured housing in single-family residential zones. The Town has limited jurisdiction over mobile home parks, but enforces code compliance in the parks as it relates to life safety issues. The Town also has a Mobile Home Park (MHP) zone. This district applies to mobile home parks that existed upon completion of the General Plan and allows for a density range of five to 15 dwelling units per acre. The purpose of this zone is to establish standards to insure that mobile home parks or subdivisions are developed in a manner that is compatible and complementary to existing and future residential development in the immediate vicinity and in a manner that is consistent with State laws including provisions of the Mobile Home Parks Act and Mobile Home Parks Regulations.

The City of Victorville Zoning Ordinance allows for the installation of one single manufactured dwelling within the single-family residential zone district. Additionally, it allows for mobile home subdivisions/parks within the multiple family residential zone districts. All of the aforementioned options authorized by the Development Code provides for a wide variety of housing types which helps to ensure affordability.

Residential Care Facilities

The Lanterman Developmental Disabilities Services Act and Community Care Facilities Act, both codified in the California Codes, state that mentally, physically, or developmentally disabled children and adults who require supervised care are entitled to live in normal residential settings. In an effort to facilitate adequate housing opportunities for people with disabilities, State law requires that licensed family care homes, foster homes, and group homes serving six or fewer persons be treated like single-family use.

According to the California Department of Social Services, Community Care Licensing Division, there are 34 residential care facilities for the elderly and nine adult day care centers located in Apple Valley and Victorville. The adult day care facilities have a capacity to serve 450 seniors, and the residential care facilities have the capacity to serve 672 seniors. Figure 6 on page 33 illustrates the location of the various licensed care facilities in Apple Valley and Victorville. The central portions of both jurisdictions are well served by various types of community care

facilities, however, there is a noticeable absence of facilities in the northern areas of Apple Valley (above Corwin and Waalew Roads) and Victorville (above Adelanto Road).

The Town of Apple Valley permits small residential care facilities serving six or fewer persons in all residential zones and conditionally permits large residential care facilities serving more than six persons in all residential zones. Furthermore, there are no requirements for the concentration of residential care facilities. The Town processes and approves requests for the establishment of residential care facilities, in accordance with Section 1566.3 of the Health and Safety Code, as a means of providing long-term transitional housing for very low income persons.

Consistent with state law, the City of Victorville permits small residential care facilities that serve six or fewer clients in every residential zone. It also does not regulate concentrations of group homes or contain specific site planning criteria for group homes. Any group home would be regulated by the zoning district in which it locates. Regarding business licenses, the City follows California Health and Safety Code Section 1566.2, for residential facilities with six or fewer persons. The Health and Safety Code prohibits the charging small residential care facilities (six or fewer) any business taxes, local registration fees, use permits, fees, or other fees not required for other similar uses. However, the City's Development Code does not specifically address the development of large residential care facilities serving more than six persons. In light of recent changes to State law (SB 2 - Housing for the Homeless; AB 2634 - Housing for Extremely Low Income; and SB 812 - Housing for Persons with Developmental Disabilities), the City will review its Development Code for compliance with housing for persons with disabilities.

Emergency Shelters

An emergency shelter is a facility that provides temporary shelter and feeding of indigents or disaster victims, operated by a public or non-profit agency. State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Section 65583(c)(1) of the Government Code). Enacted in 2007, State law (SB 2), requires that local jurisdictions make provisions in the Development Code to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish standards to regulate the development of emergency shelters.

The Town of Apple Valley currently permits the development of homeless shelters in the Service Commercial (C-S) and Village Commercial (C-V) zones via a Special Use Permit (SUP) process. Emergency shelters are permitted by right in the Planned Industrial (I-P). The Town also continues, through the Apple Valley/Victorville Consortium, to work with local agencies and organizations in providing shelter and transitional housing for the homeless.

In the City of Victorville, homeless and emergency shelters are currently permitted in the Commercial (C-1 only), Mixed Density, Medium Density and High Density Residential zones, pursuant to a Conditional Use Permit. To conform to recent changes in State law, specifically California Government Code Section 65583 (SB2), City staff is in the process of inventorying

potential sites for emergency shelters to determine which would be the best for allowing them as permitted uses.

Transitional and Supportive Housing

State law (AB 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing and supportive housing are defined as follows:

- **Transitional Housing:** Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (California Health and Safety Code Section 50675.2).
- **Supportive Housing:** Housing with no limit on length of stay that is occupied by a target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (California Health and Safety Code 50675.14 (b)). Target population includes adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (Division 4.5, commencing with Section 4500, of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people (California Health and Safety Code 53260 (d)).

Pursuant to SB 2, transitional and supportive housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit).

The Town of Apple Valley currently permits the development of transitional housing by right in the I-P zone. Such use is also permitted in the C-S and C-V zones via an SUP, and via a Conditional Use Permit (CUP) in all residential zones [Very Low Density Residential (R-VLD), Residential Agriculture (RA), Low Density Residential (RLD), Estate Residential (RE), Estate Residential 3/4 (RE3/4), Equestrian Residential (REQ), Single-Family Residential (RSF), Multi-Family Residential (RM), Mobile Home Park (MHP), Mixed Use (MU), and Planned Residential Development (PRD)]. Supportive housing is permitted by right in the I-P zone and permitted via a CUP in all residential zones.

The Town also waives fees for the development of transitional housing. In addition, transitional and supportive housing as a regular residential use will be subject to only those restrictions that apply to other residential uses of the same type in the same zone.

Currently, the City of Victorville does not address transitional or supportive housing in its Development Code. As part of the Development Code update process, the City will revise provisions in the Development Code to ensure that any residential development, including

transitional housing, is not restrictive because of method of financing, race, sex, national origin, marital status or disability of its owners or intended occupants.

Single-Room Occupancy

AB 2634 mandates that local jurisdictions address the provision of housing options for extremely low income households, including Single Room Occupancy units (SRO). SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many new SROs have one or the other.

Currently, the Town of Apple Valley's Development Code conditionally permits the development of SRO housing in the Planned Industrial zone. The City of Victorville allows for Single Room Occupancy (SRO) developments in the R-3 and R-4 zones. These zones permit units as small as 120 square feet and as large as 300 square feet, which would be designed to accommodate up to two persons per unit. SROs are conditionally permitted, subject to the following development standards: a) parking is required at one space for every two units; b) setbacks and height follow the zone district.

B. Building, Occupancy, Health and Safety Codes

1. Building Codes

Building codes, such as the California Building Standards Code¹⁴ and the Uniform Housing Code are necessary to protect public health, safety, and welfare. However, local codes that require substantial improvements to a building might not be warranted and deter housing construction and/or neighborhood improvement. The California Building Standards Code is published every three years by order of the California legislature. The Code applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the triennial compilation of Codes is not only a legal mandate, it also ensures the highest available level of safety for citizens and that all construction and maintenance of structures meets the highest standards of quality.

As with most communities in California, the Town of Apple Valley has adopted the California Building Code (CBC), and updates the Code periodically as State-wide updates are developed. Currently, the Town is enforcing the provisions of the 2007 CBC. The Town cannot adopt standards that are less stringent than the CBC. Since all communities in the State enforce similar provisions, the Town's CBC requirements are not an undue constraint on the development of affordable housing.

The City of Victorville recently adopted the International Building Code. This building code is followed uniformly by cities across the country, and consequently, is not considered a

¹⁴ Also known as Title 24 of the California Code of Regulations, the California Building Standards Code, adopted by the a Building Standards Commission, is actually a set of uniform building, electrical, mechanical, and other codes adopted by professional associations such as the International Conference of Building Officials, and amended to include California-specific requirements.

constraint to development of affordable housing. Victorville's code enforcement is very proactive when it comes to construction without a permit, especially if there is an imminent threat to public health, safety, and welfare.

2. Occupancy Standards

Disputes over occupancy standards are typical tenant/landlord and fair housing issues. Families with children and large households are often discriminated in the housing market, particularly in the rental housing market, because landlords are reluctant or flatly refuse to rent to such households. Establishing a strict occupancy standard either by the local jurisdictions or by landlords on the rental agreements may be a violation of fair housing practices.

In general, no State or federal regulations govern occupancy standards. The State Department of Fair Employment and Housing (DFEH) uses the "two-plus-one" rule in considering the reasonable number of persons per housing unit – two persons per bedroom plus an additional person. Using this rule, a landlord cannot restrict occupancy to fewer than three persons for a one-bedroom unit or five persons for a two-bedroom unit, etc. Other issues such as lack of parking, gender of the children occupying one bedroom, should not be factors considered by the landlord when renting to a household. While DFEH also uses other factors, such as the age of the occupants and size of rooms, to consider the appropriate standard, the two-plus-one rule is generally followed. Other guidelines are also used as occupancy standards – the California Fire Code and the Uniform Housing Code. The Fire Code allows one person per 150 square feet of "habitable" space. The Uniform Housing Code (1997 edition) outlines a standard of one person for every 50 square feet of bedroom space. These standards are typically more liberal than the "two-plus-one" rule.

A review of occupancy standards revealed that the Municipal Codes of Apple Valley and Victorville do not overtly limit the number of people who can occupy a housing unit. However, the definition used by some jurisdictions to define "family" as a household of not more than a certain number of individuals or a "reasonable" number of individuals could constitute an impediment to fair housing choice. Such a definition of family may be interpreted as an occupancy standard that in some cases could be more restrictive than that established in the Uniform Housing Code, California Fire Code, or DFEH guidelines. Apple Valley's definition of family does not specify or limit the number of persons in a "family," and is therefore not considered an impediment to fair housing. Victorville's Municipal Code does not include a definition of "family."

C. Affordable Housing Development

In general, many minority and special needs households are disproportionately affected by a lack of adequate and affordable housing in a region. While affordability issues are not directly fair housing issues, expanding access to housing choices for these groups cannot ignore the affordability factor. Insofar as rent-restricted or non-restricted low-cost housing is concentrated in certain geographic locations, access to housing by lower income and minority groups in other areas is limited and can therefore be an indirect impediment to fair housing choice. Furthermore, various permit processing and development impact fees charged by local government results in increased housing costs and can be a barrier to the development of

affordable housing. Other policies and programs, such as inclusionary housing and growth management programs, can either facilitate or inhibit the production of affordable housing. These issues are examined in the subsections below.

1. Siting of Affordable Housing

Apple Valley and Victorville are generally lower-cost communities than communities in the Greater Los Angeles and San Bernardino areas “over the hills.” Affordable housing projects in Apple Valley and Victorville are shown in Figure 7 on page 76.

2. Development Fees

New residential development imposes certain short- and long-term costs upon local government. These include the short-term cost of providing City planning services and inspections of new development. Long-term costs include the maintenance and improvement of the community’s infrastructure, facilities, parks, streets, and other essential local services. The Town of Apple Valley and City of Victorville charge planning and development fees to recoup these costs and ensure that essential services and infrastructure are available to serve the residents.

Planning and Building Fees

The Town of Apple Valley has a “fee for service” application fee schedule. A deposit is applied to most applications made to the Town. Staff time and expenses are billed against the deposit. In most cases, the deposit is not exceeded; and any unused deposit is returned to the applicant upon completion of the case. The Town’s fees are not unusually high when compared to other communities in San Bernardino County. In addition, the Town’s Building Department charges on a per square foot basis for building permit plan checks and inspections. Fees are based on the CBC components, and include electrical, plumbing, structural and architectural fees. To reduce the impact of fees on the development of housing for persons with special needs, the Town waives fees for emergency shelters and transitional housing.

Development fees that apply to residential development in Victorville are also low relative to most areas in the County. Fees are not set based on the actual cost of services, but rather on a set schedule adopted by the City Council. As a result, most development fees are set substantially below the cost of the actual services. Because City fees are lower than actual costs and lower than many other San Bernardino County cities, they do not act as a constraint to development.

Impact Fees

In addition to service fees directly associated with development processing, jurisdictions frequently charge impact fees to ensure that infrastructure, public services, and facilities have adequate capacity to accommodate the demands placed upon them by new residential development. Similar to service fees, the California Government Code permits the jurisdictions of Apple Valley and Victorville to charge such impact fees, provided the fee has a reasonable

relationship to the infrastructure costs imposed on local government and the fee amount is structured to recover the marginal costs associated with each new development project.

The Town of Apple Valley levies a number of impact fees for residential development, including park, sewer, transportation, and fire department impact fees. These fees vary depending on the type of housing unit. In addition to the Town's fees, residential developers are responsible for the payment of the State-mandated school fees, as well as connection and/or metering fees for public utilities. Periodically, the Town reexamines its development fees and dedication requirements to ensure that they are in the range of similar service costs in surrounding communities.

The City of Victorville imposes a development impact fee of approximately \$10,000 per single-family unit and \$7,405 per multi-family unit, as well as a school impact fee, which varies by district. The City does not require any additional impact fee for residential development.

D. Other Land Use Policies, Programs, and Controls

Land use policies, programs, and controls can impede or facilitate housing development and can have implications for fair housing choice in a community. Inclusionary housing policies and redevelopment project areas can facilitate new affordable housing projects, while growth management programs and Article 34 of the California Constitution can impede new affordable housing development.

1. Inclusionary Housing Ordinance

Inclusionary housing describes a local government requirement that a specified percentage of new housing units be reserved for, and affordable to, lower and moderate income households. The goal of inclusionary housing programs is to increase the supply of affordable housing commensurate with new market-rate development in a jurisdiction. This can result in improved regional jobs-housing balances and foster greater economic and racial integration within a community. The policy is most effective in areas experiencing rapid growth and a strong demand for housing.

Inclusionary programs can be voluntary or mandatory. Voluntary programs typically require developers to negotiate with public officials but do not specifically mandate the provision of affordable units. Mandatory programs are usually codified in the Development Code, and developers are required to enter into a development agreement specifying the required number of affordable housing units or payment of applicable in-lieu fees¹⁵ prior to obtaining a building permit. Apple Valley and Victorville do not currently have any inclusionary housing programs in place.

¹⁵ *An in-lieu fee is the payment of a specified sum of money instead of constructing the required number of affordable housing units. The fee is used to finance affordable housing elsewhere in a community.*

2. Article 34

Article 34 of the State Constitution requires a majority vote of the electorate to approve the development, construction, or acquisition by a public body of any “low rent housing project” within that jurisdiction. In other words, for any projects where at least 50 percent of the occupants are low income and rents are restricted to affordable levels, the jurisdiction must seek voter approval known as “Article 34 Authority” to authorize that number of units.

In the past, Article 34 may have prevented certain projects from being built. In practice, most public agencies have learned how to structure projects to avoid triggering Article 34, such as limiting public assistance to 49 percent of the units in the project. Furthermore, the State legislature has enacted Sections 37001, 37001.3, and 37001.5 of the Health and Safety Code to clarify ambiguities relating to the scope of the applicability of Article 34 which now exist.

The Town of Apple Valley does not serve as owner or developer for any low-cost housing projects. Affordable housing is created through development agreements with the project developers.

3. Growth Management

Growth management programs facilitate well-planned development and ensure that the necessary services and facilities for residents are provided. However, a growth management program may act as a constraint if it prevents a jurisdiction from addressing its housing needs, which could indirectly impede fair housing choice. These programs range from general policies that require the expansion of public facilities and services concurrent with new development, to policies that establish urban growth boundaries (the outermost extent of anticipated urban development), to numerical limitations on the number of dwelling units that may be permitted annually. Apple Valley and Victorville do not currently have any growth management programs or policies in place.

E. Policies Causing Displacement or Affect Housing Choice of Minorities and Persons with Disabilities

Local government policies could result in displacement or affect representation of minorities or the disabled. Policy areas that could have these effects are summarized accordingly: redevelopment activities, reasonable accommodations, ADA compliant public facilities, and occupancy standards.

1. Reasonable Accommodation

Under State and federal law, local governments are required to “reasonably accommodate” housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary to make new construction or rehabilitation of housing for persons with disabilities feasible, but are not required to fundamentally alter their Development Code.

Although most local governments are aware of State and Federal requirements to allow reasonable accommodations, if specific policies or procedures are not adopted by a jurisdiction or a jurisdiction requires a public hearing or discretionary decision, residents with disabilities residents may be unintentionally displaced or discriminated against.

The Town of Apple Valley currently does not have a formal reasonable accommodation procedure in place. However, the Development Code was recently amended to clarify that access ramps may be constructed within the front, side or rear yard setback of any residential structure, as part of the building permit plan check. No variance or Conditional Use Permit is currently required, nor will it be. A formal reasonable accommodation procedure will be established to provide exception in zoning and land use for persons with disabilities.

In August 2006, the City of Victorville adopted a Reasonable Accommodations in Housing to Disabled or Handicapped Individuals Ordinance. The purpose of this ordinance was to provide a process for individuals with disabilities to make requests for, and be provided, reasonable accommodation in the application of zoning regulations to housing. This ordinance complies with Fair Housing Laws and is administered by the City's Development Department.

F. Equal Provision of and Access to Government Services

It is important that all socioeconomic segments of society are served equally with government services.

1. Public Schools

Public education in the Town of Apple Valley is administered by the Apple Valley Unified School District. The District is one of the highest achieving districts in the High Desert, serving over 13,500 students ranging from pre-school through twelfth grade. The district has ten elementary schools, two comprehensive high schools, and one K-12 independent study/hybrid/online course school. The District serves an area of 205 square miles with an elevation ranging from 2,800 to 4,000 feet. The City of Victorville is served by the Victor Elementary School District, the Victor Valley Union High School District, the Adelanto Elementary School District, the Hesperia Unified School District and the Snowline Joint Unified School District.

As part of President Johnson's "War on Poverty," the Elementary and Secondary Education Act (ESEA) was passed in 1965. It is often regarded as the most far-reaching federal legislation affecting education ever passed by Congress. The act is an extensive statute that funds primary and secondary education, while emphasizing equal access to education and establishing high standards and accountability. A major component of ESEA is a series of programs typically referred to as "Title I." Title I programs distribute funding to schools and school districts with a high percentage of students from low income families. To qualify as a Title I school, a school typically must have around 40 percent or more of its students coming from families who are low income. The programs also give priority to schools that are in obvious needs of funds, low-achieving schools, and schools that demonstrate a commitment to improving their education standards and test scores.

Figure 9 on page 97 illustrates the location of the City's Title I schools. Most of these schools are located in the Town of Apple Valley east of Kiowa Road. Only one Title I school is located within the City of Victorville.

2. Access to Transit

Equal provision of transit services is indirectly a fair housing issue if transit-dependent populations are not adequately served by public transit, thereby limiting their housing choice. One way to measure this is to compare the relationship between existing transit routes, employment centers, and areas where residents are using transit regularly.

As depicted in Figure 10 (on page 98), the central portions of both jurisdictions are well served by existing transit service. However, the outlying areas of both Apple Valley and Victorville, particularly the northern regions of both jurisdictions, lack any transit options. Nearly all of the City's major employers are also located directly on or adjacent to public transit routes.

However, participants of community and focus group meetings conducted as part of this AI development expressed most services are located "down the hill." Many lower income persons must rely on the public transportation system to access these services. However, many residents, particularly the seniors and the disabled found the system difficult to navigate.

Figure 9: Title I Schools

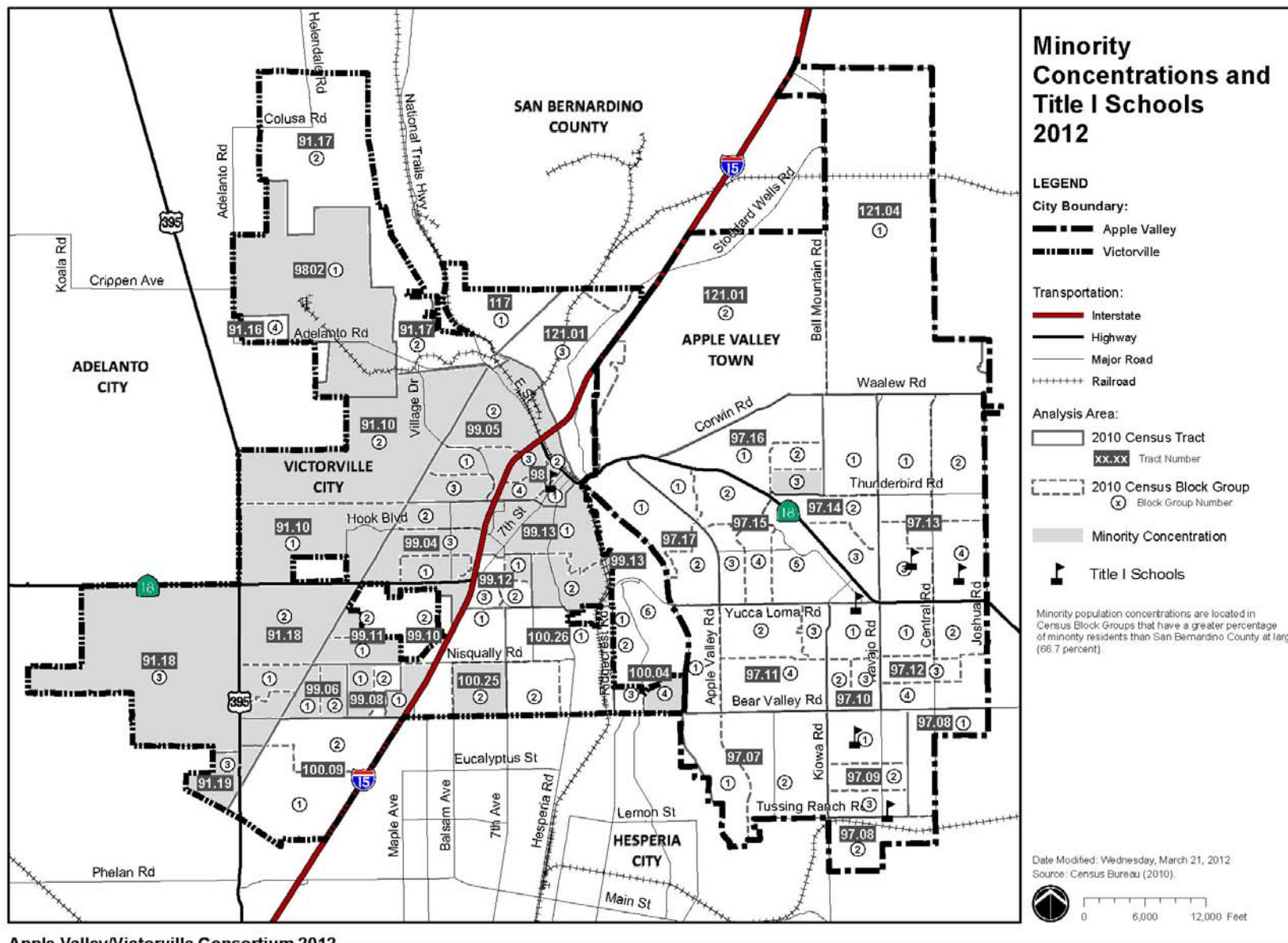
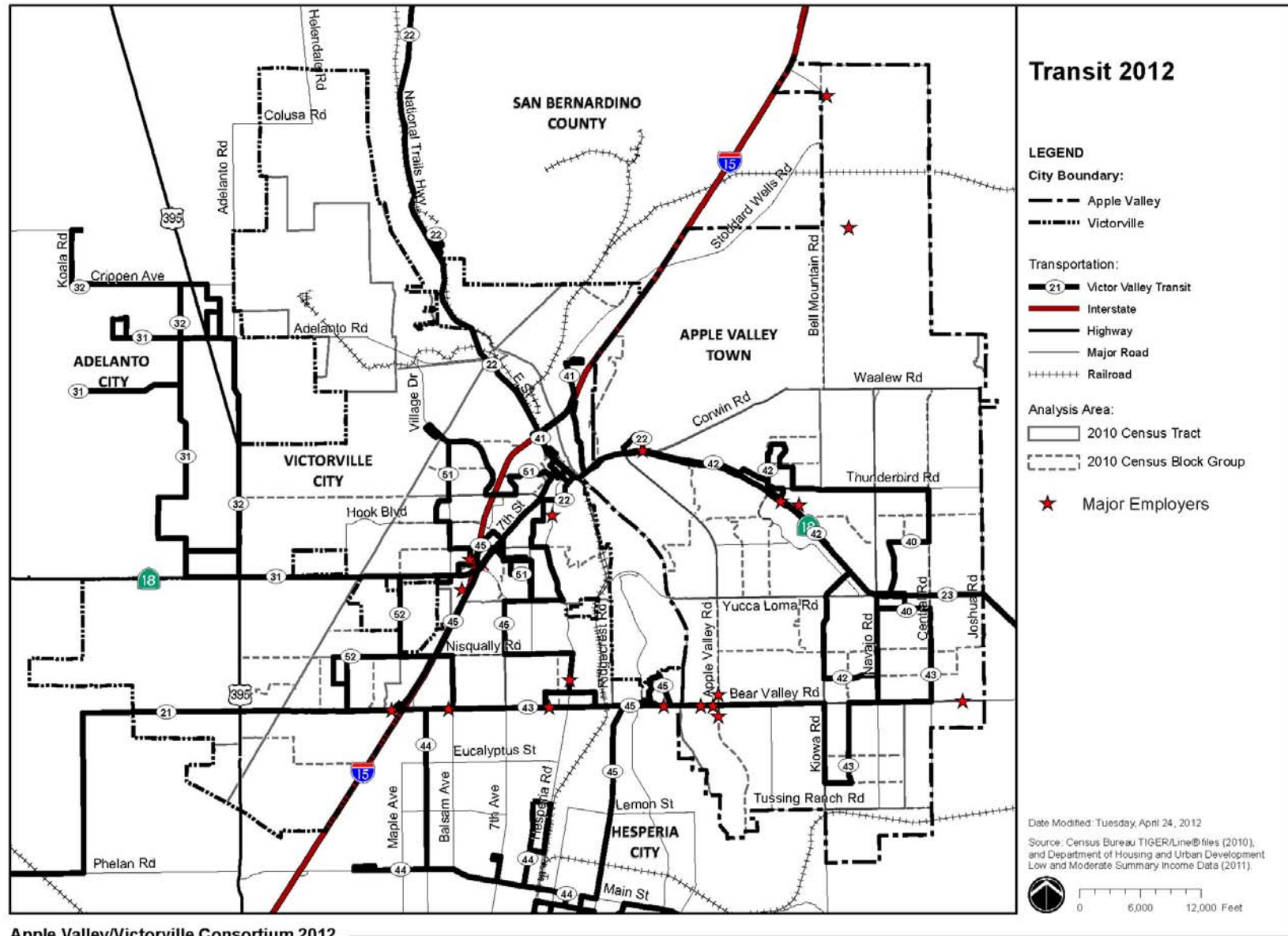


Figure 10: Major Employers and Public Transit



3. ADA Compliant Public Facilities (Section 504 Assessment)

The Americans with Disabilities Act (ADA) of 1990 is federal civil rights legislation which makes it illegal to discriminate against persons with disabilities. Title II of the ADA requires elimination of discrimination in all public services and the elimination of architectural barriers in all publicly owned buildings and facilities. It is important that public facilities are ADA compliant to facilitate participation among disabled residents in the community planning and decision-making processes. One of the key places that facilitate community participation is City Hall.

Apple Valley's Town Hall and Development Services Building are both ADA compliant. Although not all of the Town's parks and recreation facilities are 100 percent ADA compliant currently, Apple Valley has endeavored to continue upgrading facilities and increasing accessibility Townwide. James Woody Community Center, located in James Woody Park is substantially ADA accessible; The Community Center has an ADA accessible gymnasium, however, a kitchen door remains inaccessible presently. Ramps have been installed in all park playgrounds and playgrounds all have ADA compliant safety surfaces. Park restrooms are also all ADA accessible.

G. Local Housing Authority

The Housing Authority of the County of San Bernardino (HACSB) administers the Housing Choice Voucher (Section 8 program for Apple Valley and Victorville. The HACSB manages 8,188 vouchers to low-income families and individuals. Approximately 67 percent of the participants in this program are children, seniors, or individuals with disabilities. HACSB also operates a Public Housing Program that manages 1,308 units throughout San Bernardino County that houses low-income families. Approximately 66 percent of public housing residents are children, seniors, or individuals with disabilities. In addition, the Housing Authority has acquired and/or developed 1,202 housing units and four commercial units. The Housing Authority contracts directly with a private management company to manage these properties.

The availability and use of Housing Choice (Section 8) vouchers must adhere to fair housing laws. The HACSB has established a priority for veterans when distributing Housing Choice vouchers and has adopted the following priorities or preferences for its public housing units (listed below in order of greatest priority):

- 1) Veterans
- 2) Family, Elderly, and Disabled
- 3) Residency Preference
- 4) Deconcentration Income Preference

For Housing Choice vouchers, the Housing Act mandates that not less than 75 percent of new admissions must have incomes at or below 30 percent of the AMI. The remaining balance of 25 percent may have incomes up to 80 percent of the AMI.

H. Community Participation

Adequate community involvement and representation are important to overcoming and identifying impediments to fair housing or other factors that may restrict access to housing. Decisions regarding housing development in a community are typically made by the Town/City Council and Planning Commission. The Council members are elected officials and answer to the constituents. Planning Commissioners are residents appointed by the Council or the Mayor and serve an advisory role to the elected officials. In addition to the Town/City Council and Planning Commission, the two jurisdictions have a number of commissions, committees, and task forces to address specific issues:

Apple Valley

- Parks and Recreation Commission - A five-member commission whose purpose is assisting the Town Council in assessing the parks and recreation needs of the community and acting in an advisory capacity to the Town Council in matters pertaining to parks and recreational programming. The Parks and Recreation Commission consists of five members, one nominated by each member of the Town Council, and approved by a majority vote of the entire Town Council.

Victorville

- Historic Preservation Commission - A five-member commission whose purpose is to advise the City Council on historical preservation related issues. The Historic Preservation Commission is made up of members of the City's Planning Commission.

Community participation can be limited or enhanced by actions or inaction by a public agency. A broader range of residents may feel more comfortable approaching an agency with concerns or suggestions if that agency offers sensitivity or diversity training to its staff members that typically interface with the public. In addition, if there is a mismatch between the linguistic capabilities of staff members and the native languages of local residents, non-English speaking residents may be unintentionally excluded from the decision making process. Another factor that may affect community participation is the inadequacy of an agency or public facility to accommodate residents with various disabilities.

While providing fair housing education for the public and housing professionals is critical, ensuring Town and City staff understand fair housing laws and are sensitive to the discrimination issues is equally important. The Town of Apple Valley's Human Resources Department does not offer sensitivity training to its employees, but a fair housing workshop is provided for the public on an annual basis. The Inland Fair Housing and Mediation Board also hosts a fair housing session for the Town's Code Enforcement Division, the most recent of which was held on October 13, 2011. Currently, the Town has the capability of accommodating both English and Spanish speaking residents, with Spanish speaking employees translating on an as needed basis and interpreters provided through the Town Clerk's Office for all public meetings.

Victorville also provides fair housing training to its employees. The most recent training occurred on February 22, 2012. City Staff from the Building, Housing, Code Enforcement, Business License, and other departments were included in the training. Victorville staff also has the capacity to accommodate English and Spanish languages.

Chapter 6: Fair Housing Profile

This chapter provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this chapter discusses the fair housing services available to residents in Apple Valley and Victorville, as well as the nature and extent of fair housing complaints received by the fair housing provider. Typically, fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information. Tenant/landlord counseling services are usually offered by fair housing service providers but are not considered fair housing services.

A. Fair Housing Practices in the Homeownership Market

Part of the American dream involves owning a home in the neighborhood of one's choice. Homeownership is believed to enhance one's sense of well-being, is a primary way to accumulate wealth, and is believed to strengthen neighborhoods, because residents with a greater stake in their community will be more active in decisions affecting the future of their community. Not all Americans, however, have always enjoyed equal access to homeownership due to credit market distortions, "redlining," steering, and predatory lending practices.

On December 5, 1996, HUD and the National Association of REALTORS® (NAR) entered into a Fair Housing Partnership. Article VII of the HUD/NAR Fair Housing Partnership Resolution provides that HUD and NAR develop a Model Affirmative Fair Housing Marketing Plan for use by members of the NAR to satisfy HUD's Affirmative Fair Housing Marketing regulations. Yet there is still much room for discrimination in the housing market. This section analyzes potential impediments to fair housing in the home ownership sector.

1. The Homeownership Process

The following discussions describe the process of homebuying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market over which local jurisdictions have little control or authority to regulate. The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal actions.

Advertising

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the Internet to get a feel for what the market offers. Advertisements cannot include discriminatory references such as the use of words describing:

- Current or potential residents;
- Neighbors or the neighborhood in racial or ethnic terms;
- Adults preferred;

- Perfect for empty nesters;
- Conveniently located by a Catholic Church; or
- Ideal for married couples without kids.

In a survey of online listings for homes available for purchase in Apple Valley and Victorville in November 2011, a very small percentage of advertisements included potentially discriminatory language.

Of a total of 806 listings, 19 listings included references to something other than the physical description of the available home and amenities and services included (Table 45). Ten of the advertisements were targeted specifically at families, and another eight ads included potentially discriminatory income-related language. Other ads included descriptions that may be interpreted as potentially gender discriminatory.

Table 45: Potential Discrimination in Listings of For-Sale Homes in Apple Valley		
Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	787	n/a
Income Related	8	<ul style="list-style-type: none"> • Perfect for First Time Buyers • Great starter home • Great opportunity for investor or first time home buyer.
Household Size/ Family Related	10	<ul style="list-style-type: none"> • Plenty of room for all your toys. • Enjoy the huge back yard well suited for large family gatherings and pool parties. Large family kitchen with all the comforts for your family cook and plenty of cabinets. • Lots of Room For Your Toys and Family • Property has an enormous back yard with horse stables and plenty of room for the kids to run around. • Perfect for a large family!!
Miscellaneous	1	<ul style="list-style-type: none"> • Perfect for someone with lots of cars, tools or trucks

Source: *www.realtor.com*, accessed November, 2011.

*Examples are direct quotes from the listings (including punctuation and emphasis).

Of a total of 1,134 listings, 50 listings included references to something other than the physical description of the available home and amenities and services included (Table 46). Twenty-five of the advertisements were targeted specifically at families, and another 23 ads included potentially discriminatory income-related language. Other ads included excessive descriptions of desired tenants.

Table 46: Potential Discrimination in Listings of For-Sale Homes in Victorville

Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	1,084	n/a
Income Related	23	<ul style="list-style-type: none"> • FHA offers okay! • Property is sold as is, and is a HUD home • Great for first time home buyers or investors • Perfect for a first time home buyer who is looking to stop renting • CASH OFFER ONLY. • First time buyer property need some tlc.
Household Size/ Family Related	25	<ul style="list-style-type: none"> • Perfect family home!! • Perfect move in condition for hot days nice swimming pool/ and BBQ to entrainment family and friends • 2nd floor features a spacious family room that can also be used as a play room • This Home Is Great For Entertaining and a Growing Family. • 4bed 3 bath 2 story home in ideal Fox Fire Ranch location, near prestigious Discovery School of the Arts. • Patio with plenty of room for the entire family. • Plenty of space for a big family, in very good condition, big front and back yard close to schools, fwys and shops • Home in good condition, walk to school nearby.
Miscellaneous	2	<ul style="list-style-type: none"> • This is great for someone that wants to have its ranch in the middle of the city! • Great for commuting

Source: *www.realtor.com*, accessed November, 2011.

*Examples are direct quotes from the listings (including punctuation and emphasis).

Advertising has become a sensitive area in real estate. In some instances advertisements published in non-English languages may make those who speak English uncomfortable, yet when ads are only placed in English they place non-English speaking residents at a disadvantage. While real estate advertising can be published in other languages, by law an English version of the ad must also be published, and monitoring this requirement is difficult, if not impossible.

Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether or not a particular group is preferred. Recent litigation has also set precedence for violations in advertisements that hold publishers, newspapers, Multiple Listing Services, real estate agents, and brokers accountable for discriminatory ads.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment

Act (CRA) and the Home Mortgage Disclosure Act (HMDA). However, analysis of lending data over the last decade has led many to conclude that lower income households and minorities have been targeted for predatory lending.

Lending discrimination can occur during advertising/outreach, pre-application inquiries, loan approval/denial and terms/conditions, and loan administration. Further areas of potential discrimination include: differences in the level of encouragement, financial assistance, types of loans recommended, amount of down payment required, and level of customer service provided.

Appraisals

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan they will be giving. Generally speaking, appraisals are based on the comparable sales of properties within the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, general economic influences, etc. However, during the mortgage lending and refinancing frenzy prior to 2008, there have been reports of inflated home values in order to entice refinancing.

Real Estate Agents

Real estate professionals may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not 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.

The California Association of REALTORS® (CAR) has included language on many standard forms disclosing fair housing laws to those involved. Many REALTOR® Associations also host fair housing trainings/seminars to educate members on the provisions and liabilities of fair housing laws, and the Equal Opportunity Housing Symbol is also printed on all CAR forms as a reminder.

Covenants, Conditions, and Restrictions (CC&Rs)

Covenants, Conditions, and Restrictions (CC&Rs), are restrictive promises that involve voluntary agreements, which run with the land they are associated with and are listed in a recorded Declaration of Restrictions. The Statute of Frauds (Civil Code Section 1624) requires them to be in writing, because they involve real property. They must also be recorded in the County where the property is located in order to bind future owners. Owners of parcels may agree amongst themselves as to the restrictions on use, but in order to be enforceable they must be reasonable.

The California Department of Real Estate reviews CC&Rs for all subdivisions of five or more lots, or condominiums of five or more units. This review is authorized by the Subdivided Lands Act and mandated by the Business Professions Code, Section 11000. The review includes a wide range of issues, including compliance with fair housing law. The review must be

completed and approved before the Department of Real Estate will issue 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. If the CC&Rs are not approved, the Department of Real Estate will issue a “deficiency notice”, requiring the CC&Rs be revised. CC&Rs are void if they are unlawful, impossible to perform or are in restraint on alienation (a clause that prohibits someone from selling or transferring his/her property). However, older subdivisions and condominium/townhome developments may contain illegal clauses which are enforced by the homeowners associations.

Homeowners Insurance Industry

Insurance is the cornerstone of credit. Without insurance, banks and other financial institutions lend less. Fewer loans leads to fewer new homes constructed and more existing homeowners will forgo repairs leaving buildings to deteriorate faster.¹⁶ Many traditional industry underwriting practices which may have some legitimate business purpose also adversely affect lower income and minority households and neighborhoods. For example, if a company excludes older homes from coverage, lower income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI.¹⁷ 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.

The California Fair Access to Insurance Requirements (FAIR) Plan was created by the Legislature in 1968 after the brush fires and riots of the 1960s made it difficult for some people to purchase fire insurance due to hazards beyond their control. The FAIR Plan is designed to make property insurance more readily available to people who have difficulty obtaining it from private insurers because their property is considered "high risk."

The California Organized Investment Network (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, which provide profitable returns to investors, and economic and social benefits to underserved communities.

¹⁶ National Advisory Panel on Insurance in Riot Affected Areas, 1968.

¹⁷ “Borrower and Neighborhood Racial Characteristics and Financial Institution Financial Application Screening”; Mester, Loretta J; *Journal of Real Estate Finance and Economics*; 9 241-243; 1994

Credit and FICO Scores

Credit history is one of the most important factors in obtaining a home purchase loan. Credit scores determine loan approval, interest rates associated with the loan, as well as the type of loan an applicant will be given. Applicants with high credit scores are generally given conventional loans, while lower and moderate range scores revert to FHA or other government-backed loans. Applicants with lower scores also receive higher interest rates on the loans as a result of being perceived as a higher risk to the lender, and may even be required to pay points depending on the type of lending institution used.

Fair Isaac and Company (FICO), which is the company used by the Experian (formerly TRW) credit bureau to calculate credit scores, has set the standard for the scoring of credit history. Trans-Union and Equifax are two other credit bureaus that also provide credit scores, though they are typically used to a lesser degree. In short, points are awarded or deducted based on certain items such as how long one has had credit cards, whether one makes payments on time, if credit balances are near maximum, etc. Typically, the scores range from the 300s to around 850, with higher scores demonstrating lower risk. Lower credit scores require a more thorough review than higher scores and mortgage lenders will often not even consider a score below 600.

FICO scores became more heavily relied on by lenders when studies conducted show that borrowers with scores above 680 almost always make payments on time, while borrowers with scores below 600 seemed fairly certain to develop problems. Some of the factors that affect a FICO score are:

- Delinquencies
- New accounts (opened within the last twelve months)
- Length of credit history (a longer history of established credit is better than a short history)
- Balances on revolving credit accounts
- Public records, such as tax liens, judgments, or bankruptcies
- Credit card balances
- Number of inquiries
- Number and types of revolving accounts

However, the current mortgage lending crunch resulted (in part) from lenders providing mortgage financing to borrowers who are not credit worthy or steering borrowers who can qualify for lower cost loans to the subprime market.

2. National Association of REALTORS® (NAR)

The National Association of REALTORS® (NAR) has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

Code of Ethics

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.”

A REALTOR® pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations upon REALTORS® and is also a firm statement of support for equal opportunity in housing. A REALTOR® who suspects discrimination is instructed to call the local Board of REALTORS®. Local Boards of REALTORS® will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase or rental of housing. Local Boards of REALTORS® have a responsibility to enforce the Code of Ethics through professional standards procedures and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

Additionally, Standard of Practice Article 10-1 states that “REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. 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.”

Diversity Certification

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 will signal to customers that the real estate professional has been trained on working with diversity in 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.

3. California Department of Real Estate (DRE)

The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. As noted earlier, not all licensed brokers and salespersons are members of the National or California Association of REALTORS®.

The DRE has adopted education requirements that include courses in ethics and in 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 will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

Prior to July 1, 2007, a real estate salesperson renewing the license for the first time must complete separate three-hour courses in Agency, Ethics, Trust Fund Handling, and Fair Housing to qualify for renewal. All licensees, with the exception of those renewing for the first time, are required to complete a full 45 hours of continuing education for each license renewal. At least 18 hours of course work specifically designated as consumer protection must be completed. An additional 15 hours of approved courses are required, which may be designated as either consumer protection or consumer service courses.

For the initial renewal on or after July 1, 2007, the law requires, as part of the 45 hours of continuing education, completion of five mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing and Risk Management. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either consumer service or consumer protection, at the option of the licensee.

4. California Association of REALTORS® (CAR)

The California Association of Realtors (CAR) is a trade association of 92,000 realtors statewide. As members of organized real estate, realtors also subscribe to a strict code of ethics as noted above. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and the meetings typically include sessions on fair housing issues. Current outreach efforts in the Southern California area are directed to underserved communities and state-licensed brokers and sales persons who are not members of the CAR.

REALTOR® Associations Serving Apple Valley and Victorville

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 amongst these associations, and local association membership is generally determined by the location of the broker for which an agent works. 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 the agencies provide or statistical information pertaining to the members is rarely available. The Victor Valley Association of REALTORS (VVAR) serves the Town of Apple Valley and City of Victorville. Currently, VVAR uses the Victor Valley Multiple Listing Service (VVMLS).

Complaints against members are handled by the associations as follows. First, all complaints must be in writing. Once a complaint is received, a grievance committee reviews the complaint to decide if it warrants further investigation. If further investigation is necessary, a professional standards hearing with all parties involved takes place. If the member is found guilty of a violation, the member may be expelled from the association, and the California Department of Real Estate is notified.

B. Fair Housing Practices in the Rental Housing Market

1. Rental Process

Advertising

Apple Valley and Victorville, like most parts of California, have an active rental housing market. Many rental properties have low vacancy rates and do not require published advertising. Often, vacancy is announced either via word of mouth of existing tenants or a for-rent sign outside the property. Unless one happens to drive by the neighborhood or have friends or families currently residing at the property, one may not have access to information regarding vacancy. Furthermore, this practice tends to intensify segregation of neighborhoods and properties that already have a high concentration of a racial/ethnic group. When advertising is done, no checks-and-balances mechanism exists to ensure English advertising is provided.

A large number of rental listings in Apple Valley and Victorville contain potentially discriminatory language, such as encouraging or discouraging family living, or potentially discouraging persons with disabilities by emphasizing a no-pet policy without clarifications that service/companion animals are allowed.

Like with ad listings for for-sale homes, rental advertisements cannot include discriminatory references. Of a total of 452 rental listings surveyed in November 2011 for the Town of Apple Valley, 155 advertisements were found to contain potentially discriminatory language (Table 47). For the City of Victorville, a total of 1,007 rental listings were reviewed and 261 advertisements were found to contain potentially discriminatory language (Table 48). A vast majority of the problematic language involves household size/family related references.

Under California's fair housing law, source of income is a protected class. It is, therefore, considered unlawful to prefer, limit, or discriminate against a specific income source for a potential homebuyer. Section 8 is not included as a part of this protected class, however, and rental advertisements that specifically state Section 8 vouchers are not accepted are considered legal. There was no indication of a prevalence of income-based discrimination in the rental listings for the Town of Apple Valley or the City of Victorville. Most of the advertisements found that make reference to a potential tenant's income source specifically stated that Section 8 was accepted.

More common in Apple Valley and Victorville were rental advertisements with references to pets. Persons with disabilities are one of the protected classes under fair housing law, and apartments must allow "service animals" and "companion animals," under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living

and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment.

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a “no pets” policy in order to allow for the use of a companion or service animal. However, in the case of rental ads that specifically state “no pets,” some disabled persons may not be aware of their right to ask for an exception to this rule. Because of this, a person with a disability may see themselves as limited in their housing options and a “no pets” policy could, therefore, be interpreted as potentially discriminatory. Of the 1,459 rental listings surveyed in November 2011, 64 ads included language to specifically ban pets.

Table 47: Potential Discrimination in Listings of Homes for Rent in Apple Valley

Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	297	n/a
Disability Related	27	<ul style="list-style-type: none"> • No pets please. • No animals.
Income Related	7	<ul style="list-style-type: none"> • Section 8 ok • Section 8 welcome!
Household Size/ Family Related	110	<ul style="list-style-type: none"> • \$25 application fee per single adult. \$30 for a married couple. • Quiet complex with two other apartments perfect for a little family. • Lot is 1 acre, zoned for horses. Bring them or your toys. Peaceful neighborhood in the Apple Valley Ranchos area. Close to school bus stop. • Ideal for couple, maximum 3 people. • Quiet neighborhood close to schools • Situated near Rancho Verde Elementary and Granite Hills High School • Great condition and ready for your family!! • Great School District and Safe Quiet Neighborhood. Fenced in Back Yard • One block to Blue Ribbon Elementary School • This is a SMALL 2 bed room house that would be great for a college student, couple, or bachelor pad. Sorry landlord prefers no kids • School bus pick up and drop off at the clubhouse door. • This is a lovely Location to Bring Your Family and any Furry Friends You Might Have!! • In excellent condition and ready for your family!! • You can have your kids walk to Sultana High which is just around the corner.
Spanish Only Ads	7	n/a
Miscellaneous	4	<ul style="list-style-type: none"> • Perfect for the underemployed contractor/handyman. • Next door to hiking hills. • The incredible Desert & Mountain Views, are luring to the artistic and contemplative. In this special place, your spirit will feel cleansed and nourished by the landscape. • I am looking for someone who doesn't drink, do drug's or smoke inside or no animal's.

Sources: *www.craigslist.com*, accessed November, 2011.

*Examples are direct quotes from the listings (including punctuation and emphasis).

Table 48: Potential Discrimination in Listings of Homes for Rent in Victorville

Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	746	n/a
Disability Related	37	<ul style="list-style-type: none"> • No pets • Pets no • Although we love pets, No Pets allowed.
Income Related	21	<ul style="list-style-type: none"> • Section 8 Okay • Section 8 considered? Yes • Perfect for the commuter! • w/ proof of work status
Household Size/ Family Related	172	<ul style="list-style-type: none"> • Near good schools and in a nice neighborhood. • We have Lifesteps after school program and activities Mon thru Fri. Playground for the kiddos. • Great neighborhood and great surrounding School • Desirable Family Neighborhood near Discovery School • GREAT FOR SMALL FAMILY • Playground for the kiddos. • It has a small fenced in yard for pets or kids • last home at the end of a quiet cul de sac in a clean & secure family neighborhood • Have a LARGE FAMILY? If so this home is a perfect match for your family. • Nice front and back yard, you will have a lot fun with your pets and family! • You will spend many hours enjoying the fenced yard which is perfect for kids and pets. Located just minutes away from shopping, schools, and freeway, it's the perfect location! • The home is walking distance to Green Tree East Elementary School and numerous walking/hiking trails. • Fireplace in family room. Just needs a family and decorations for the holidays! • This home is great for families and to host your extended family and friends in style. • "You must have steady income! I am a private investor and will help the right family!"
Spanish Only Ads	2	n/a
Miscellaneous	29	<ul style="list-style-type: none"> • THIS POPULAR APT COMMUNITY IN SUBURB OF VICTORVILLE IS POPULAR WITH STUDENTS, RETIREES, LAW ENFORCEMENT FAMILIES, ETC. • We will NOT process any rental applications from outside of Southern CA. Only applicants within Southern CA will be processed. • STUDENTS, VETERANS, SENIORS WELCOME! • looking for reliable tenant

Sources: www.craigslist.com, accessed November, 2011.

*Examples are direct quotes from the listings (including punctuation and emphasis).

Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. In a 2010 study in Dallas and Boston metro-areas, comprehensive testing documented the treatment of more than a thousand respondents to Craigslist advertisements and other solicitations for apartments. The audit found significant differences in treatment between testers with White sounding names, and those with Hispanic/Latino or Black sounding names.¹⁸ The Black and Hispanic/Latino sounding names were significantly less likely than those with White sounding names to receive more than one response from housing providers. The study found that the testers with minority-sounding names were also significantly less likely than White testers to be invited to view the unit.

Viewing the Unit

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules.

Credit/Income Check

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate applications.

The Lease

Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant's point of view for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. Most other provisions of a lease protect the landlord. Information written in a lease or rental agreement includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements.

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement may not be standard for all tenants. A landlord may choose to strictly enforce the rules for certain tenants based on arbitrary factors, such as race, presence of children, or disability. In recent years, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased significantly.

Lease-related language barriers can impede fair housing choice if landlords and tenants do not speak the same language. In California, applicants and tenants have the right to negotiate lease

¹⁸ *Cybersegregation in Boston and Dallas: Is Neil a More Desirable Tenant than Tyrone or Jorge?* Samantha Friedman, Gregory D. Squires, and Chris Galvan. April 2010.

terms primarily in Spanish, Chinese, Tagalog, Vietnamese or Korean. If a language barrier exists, the landlord must give the tenant a written translation of the proposed lease or rental agreement in the language used in the negotiation before the tenant signs it.¹⁹ This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing. Also, the tenant must provide the translation whether or not the tenant requests it. The translation must include every term and condition in the lease or rental agreement. A translation is not required if the tenant provides his or her own adult interpreter.

Security Deposit

A security deposit is typically required. To deter “less-than-desirable” tenants, a landlord may ask for a security deposit higher than for others. Tenants may also face discriminatory treatment when vacating the units. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord may also require that persons with disabilities pay an additional pet rent for their service animals, a monthly surcharge for pets, or a deposit, which is also a discriminatory act.

During the Tenancy

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

2. Apartment Association of California

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. The CAA was 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. Under the umbrella agency, various apartment associations cover specific geographic areas.

The California Apartment Association 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 the following nine course topics:

- Preparing the Property for Market
- Professional Leasing Skills and the Application Process
- The Move-in Process, Rent Collection and Notices
- Resident Issues and Ending the Tenancy

¹⁹ *California Civil Code Section 1632(b).*

- Professional Skills for Supervisors
- Maintenance Management: Maintaining a Property
- Liability and Risk Management: Protecting the Investment
- Fair Housing: It's the Law
- Ethics in Property Management

In order to be certified one must successfully score 75 percent or higher on the comprehensive CCRM final exam.

The CAA supports the intent of all local, State, and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. Members of the CAA agree to abide by the provisions of their Code for Equal Housing Opportunity.

3. The National Association of Residential Property Managers (NARPM)

The National Association of Residential Property Managers promotes a high standard of property management business ethics, professionalism and fair housing practices within the residential property management field. NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. Members of the association adhere to a strict Code of Ethics to meet the needs of the community, which include the following duties:

- Protect the public from fraud, misrepresentation, and unethical practices of property managers.
- Adhere to the Federal Fair Housing statutes.
- Protect the fiduciary relationship of the client.
- Treat all tenants professionally and ethically.
- Manage the property in accordance with the safety and habitability standards of the community.
- Hold all funds received in compliance with state law with full disclosure to the client.

In addition to promoting high standards of business ethics, professionalism and fair housing practices, the Association also certifies its members in the standards and practices of the residential property management industry and promotes continuing professional education.

NARPM offers three designations to qualified property managers and property management firms:

1. Residential Management Professional, RMP ®
2. Master Property Manager, MPM ®
3. Certified Residential Management Company, CRMC ®

Various educational courses are offered as part of attaining these designations including the following fair housing and landlord/tenant law courses:

- Ethnics (required for all members every four years)
- Habitability Standards and Maintenance
- Marketing
- Tenancy
- ADA Fair Housing
- Lead-Based Paint Law

4. Western Manufactured Housing Communities Association (WMA)

Western Manufactured Housing Communities Association (WMA) is a nonprofit organization created in 1945 for the exclusive purpose of promoting and protecting the interests of owners, operators and developers of manufactured home communities in California. WMA assists its members in the operations of successful manufactured home communities in today's complex business and regulatory environment. WMA has over 1,700 member parks located in all 58 counties of California.

WMA offers an award winning manager accreditation program as well as numerous continuing education opportunities. The Manufactured Home Community Manager (MCM) program is a manager accreditation program that provides information on effective community operations. WMA's industry experts give managers intensive training on law affecting the industry, maintenance standards, HCD inspections, discrimination, mediation, disaster planning, and a full range of other vital subjects. In addition, WMA offers the following services:

- Toll-free hotline for day-to-day management advice
- Resident Screening Program
- Group Workers' Compensation Program
- Legal Advice
- Industry Referrals
- Manager Referral Service
- Educational seminars on a variety of key topics

C. Fair Housing Services

In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords. This section reviews the fair housing services available in the Town of Apple Valley and the City of Victorville, the nature and extent of fair housing complaints, and results of fair housing testing/audits.

1. Inland Fair Housing and Mediation Board

The Inland Fair Housing and Mediation Board (IFHMB) is a California-based fair housing agency that serves San Bernardino County and surrounding jurisdictions, including Apple Valley and Victorville. The IFHMB provides the following fair housing related services to all Apple Valley and Victorville residents:

- Landlord/tenant mediation.
- The Fair Housing Department provides information, investigation, education, conciliation, and/or referral of housing discrimination complaints.
- Pre-litigation mediation services.
- The Agency's Mobile Home mediators offer specialized problem solving based on Mobile Home Residency Law that reflects the dual ownership and unique life style of the Mobile Home community. In-park workshops are also available for education on rights and responsibilities and understanding of the Mobile Home Residency Law (MRL).
- The Senior Services department actively mediates conflicts between seniors and Social Security, Medi-Cal, utility companies, collection agencies, neighbors, and other parties in dispute. A Care Referral Service such as personal care, housekeeping, transportation, shopping, and home maintenance is available. The Agency also provides Homeowner/Renter Assistance. A list of senior housing and board and care homes is maintained and available. The Agency also distributes a monthly West End Newsletter for seniors, which provides information, referrals, as well as monthly trips and tours for those who enjoy traveling.
- Mortgage default counseling.
- First-time homebuyer education.
- Pre-purchase counseling.
- Reverse equity mortgage counseling.
- The Outreach department actively engages community meetings, high schools, colleges, English as a Second Language (ESL) participants, Realtors and all other parties interested in learning how to avoid housing discrimination and the corresponding rights and responsibilities.

2. Department of Fair Employment and Housing

The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination based on race, sex, religious creed, color, national origin, medical condition (cured cancer only), ancestry, physical or mental disability, marital status, or age (over 40 only). DFEH also investigates complaints of housing discrimination based on the above classes, as well as children/age, and sexual orientation.

DFEH established a program in May 2003 for mediating housing discrimination complaints, which is a first for the State of California and is the largest fair housing mediation program in the nation to be developed under HUD's Partnership Initiative with state fair housing enforcement agencies. The program provides California's tenants, landlords, and property owners and managers with a means of resolving housing discrimination cases in a fair,

confidential, and cost-effective manner. Key features of the program are: (1) free of charge to the parties; and (2) mediation takes place within the first 30 days of the filing of the complaint, often avoiding the financial and emotional costs associated with a full DFEH investigation and potential litigation.

The fair housing service providers work in partnership with HUD and DFEH. After a person calls in for a complaint, an interview takes place, documentation is obtained and issues are discussed to decide on the course to proceed. Mediation/conciliation is offered as a viable alternative to litigation. If the mediation/conciliation is successful, the case is closed after a brief case follow-up. If the mediation/conciliation is unsuccessful, the case is then referred to DFEH or HUD. If during case development further investigation is deemed necessary, testing may be performed. Once the investigation is completed, the complainant is advised of the alternatives available in proceeding with the complaint, which include: mediation/conciliation, administrative filing with HUD or DFEH, referral for consideration to the Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, or referral to a private attorney for possible litigation.

D. Fair Housing Statistics

As part of the enforcement and tracking services provided by the above mentioned fair housing service providers, intake and documentation of all complaints and inquiries result in the compilation of statistics provided to each jurisdiction in the form of quarterly and annual reports.

Fair housing statistics for Apple Valley and Victorville are maintained by various agencies: Inland Fair Housing and Mediation Board; State Department of Fair Employment and Housing; and U.S. Department of Housing and Urban Department (HUD). Statistics maintained by these agencies indicate persistent housing discrimination based on disability, race, and familial status.

1. Inland Fair Housing and Mediation Board

Between Fiscal Year (FY) 2007-08 and FY 2009-10, IFHMB handled a total of 341 discrimination complaints. The number of complaints has increased over time, with a high of 126 complaints in FY 2009-10. A majority of complaints involved disability, closely followed by race and familial status (Table 50).

	2007-08	2008-09	2009-10	Total
Apple Valley	35	41	47	123
Victorville	58	81	79	218
Total	93	122	126	341

Source: IFHMB Annual Reports, 2007-2010.

Table 50: Basis of Discrimination (2007-2010)				
	2007-08	2008-09	2009-10	Total
<i>Apple Valley</i>				
Race	9	5	1	15
Color	0	0	0	0
National Origin	0	0	0	0
Familial Status	3	3	3	9
Disability	11	19	32	62
Sex/Gender	0	8	0	8
Religion	0	0	0	0
Marital Status	3	0	0	3
Source of Income	7	0	5	12
Age	2	0	1	3
Sexual Orientation	0	6	0	6
Arbitrary Discrimination	0	0	5	5
<i>Total</i>	<i>35</i>	<i>41</i>	<i>47</i>	<i>123</i>
<i>Victorville</i>				
Race	6	18	9	33
Color	0	0	0	0
National Origin	3	0	0	3
Familial Status	19	5	16	40
Disability	26	45	41	112
Sex/Gender	0	5	8	13
Religion	0	0	0	0
Marital Status	0	3	0	3
Source of Income	0	3	3	6
Age	4	0	0	4
Sexual Orientation	0	2	2	4
Arbitrary Discrimination	0	0	2	2
<i>Total</i>	<i>58</i>	<i>81</i>	<i>81</i>	<i>220</i>
Total	116	162	162	440

Source: IFHMB Annual Reports, 2007-2010.

2. California Department of Fair Employment and Housing (DFEH)

The mission of the Department of Fair Employment and Housing (DFEH) is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, DFEH keeps track of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

Since 2005, a total of 31 fair housing complaints in the Town of Apple Valley and City of Victorville have been filed with DFEH. Most of these complaints involved (nine instances) race

and physical disability (nine instances), followed by sex (six instances) (Table 51). Overall, a total of 41 acts of discrimination were recorded in Apple Valley and Victorville. Refusal to rent (12 instances), unequal terms (seven instances), and eviction (six instances) were the most common acts of discrimination in Apple Valley and Victorville (Table 55). Three-quarters of total fair housing cases (15 cases) in Apple Valley and Victorville were found to have no probable cause and subsequently closed. An additional three cases were closed after successful mediation (Table 53).

Basis of Complaints	# of Complaints		
	Apple Valley	Victorville	Total
Race	4	5	9
Sex	1	5	6
Physical Disability	3	6	9
Mental Disability	0	1	1
Familial/Marital Status	1	4	5
Religion	0	1	1
Total	9	22	31

Source: California Department of Fair Employment & Housing, 2011.

Act of Discrimination	# of Acts		
	Apple Valley	Victorville	Total
Refusal to Rent	3	9	12
Eviction	3	3	6
Refusal to Show	0	0	0
Unequal Terms	0	7	7
Harassment	1	3	4
Unequal Access to Facilities	1	3	4
Occupancy Standards	0	3	3
Surcharge	0	0	0
Denied Reasonable Accommodation/Modification	2	3	5
Total	10	31	41

Source: California Department of Fair Employment & Housing, 2011.

Table 53: Disposition of Fair Housing Complaints Filed with DFEH (2005-2010)

Closing Category	# of Cases		
	Apple Valley	Victorville	Total
No Probable Cause	4	11	15
Successful Mediation	1	2	3
Successful Conciliation	1	0	1
Withdrawal without Resolution	1	0	1
Total	7	13	20

Source: California Department of Fair Employment & Housing, 2011.

Investigations begin with the intake of a complaint. Complainants are first interviewed to collect facts about possible discrimination. Interviews are normally conducted by telephone. If the complaint is accepted for investigation, the DGEH drafts a formal complaint that is signed by the complainant and served. If jurisdictional under federal law, the complaint is also filed with the United States Department of Housing and Urban Development (HUD). As a substantially equivalent agency, DFEH's findings are usually accepted by HUD. The recipient of the complaint (usually a landlord, seller, property manager, seller, or agent) is required to answer and has the opportunity to negotiate resolution with the complainant. If the case is not resolved voluntarily, the DFEH conducts a formal investigation.

If the investigative findings do not show a violation of the law, DFEH will close the case. If investigative findings show a violation of law, the DFEH schedules a formal conciliation conference. During the conciliation conference, the DFEH presents information supporting its belief that there has been a violation and explores options to resolve the complaint. If formal conciliation fails, the DFEH Housing Administrator may recommend litigation. If litigation is required, the case may be heard before the Fair Employment and Housing Commission (FEHC) or in civil court. Potential remedies for cases settled by the FEHC include out-of-pocket losses, injunctive relief, access to the housing previously denied, additional damages for emotional distress, and civil penalties up to \$10,000 for the first violation. Court remedies are identical to FEHC remedies with one exception; instead of civil penalties, a court may award unlimited punitive damages.

3. U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) maintains a record of all housing discrimination complaints for jurisdictions, including the Town of Apple Valley and the City of Victorville. According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. HUD refers complains to the California DEFH, which has 30 days to address the complaint. As a substantially equivalent agency, DFEH's findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a "dually filed" complaint.

From 2006 to 2010, 11 fair housing cases were recorded by HUD in Apple Valley and 24 cases were recorded in Victorville. In both jurisdictions, cases involving discrimination based on race, disability and familial status were the most common (Table 54). Cases concerning national origin, color, religion, retaliation and sex were also reported. The number of discrimination cases recorded has increased noticeably since 2006 in both jurisdictions.

A total of 35 fair housing cases were closed in Apple Valley and Victorville between 2006 and 2010, according to HUD. Many of these cases (23 cases) were found to have no probable cause and subsequently closed. An additional seven cases were closed after successful conciliation or resolution and just two cases were found to have actual cause (Table 55).

Table 54: Basis for Discrimination of Cases for Apple Valley filed with HUD (2006-2010)

Year	Race	Color	National Origin	Sex	Sex Orientation	Disability	Religion	Familial/ Marital Status	Retaliation	Total
<i>Apple Valley</i>										
2006	0	0	1	0	0	0	0	0	0	1
2007	0	0	0	0	0	0	0	1	0	1
2008	1	0	0	0	0	0	0	0	0	1
2009	2	0	0	1	0	0	0	1	0	3
2010	1	0	0	1	0	2	1	1	0	5
Total	4	0	1	2	0	2	1	3	0	11
<i>Victorville</i>										
2006	1	0	0	0	0	1	0	0	0	2
2007	3	0	0	0	0	0	0	0	0	3
2008	6	0	0	0	0	2	0	1	1	8
2009	1	1	1	0	0	2	0	0	0	4
2010	2	0	0	0	0	2	0	4	0	7
Total	13	1	1	0	0	7	0	5	1	24

Source: Department of Housing and Urban Development (HUD), 2011.

Table 55: Disposition of Fair Housing Cases Filed with HUD in Apple Valley (2006-2010)

Closing Category	Admin Closure	Conciliated or Resolved	No Cause	Cause	Referred and Closed by DOJ	Compensation for Conciliation or Resolution	Total
<i>Apple Valley</i>							
2006	0	0	1	0	0	--	1
2007	0	0	1	0	0	--	1
2008	0	0	1	0	0	--	1
2009	2	0	1	0	0	--	3
2010	0	2	2	1	0	\$9,500.00	5
Total	2	2	6	1	0	\$9,500.00	11
<i>Victorville</i>							
2006	0	1	1	0	0	--	2
2007	0	0	3	0	0	--	3
2008	0	2	6	0	0	\$100.00	8
2009	1	0	3	0	0	--	4
2010	0	2	4	1	0	--	7
Total	1	5	17	1	0	\$100.00	24

Source: Department of Housing and Urban Development (HUD), 2011.

E. Hate Crimes

Hate crimes are crimes committed because of a bias against race, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents.

To a certain degree, hate crimes are an indicator of the environmental context of discrimination. These crimes should be reported to the Police or Sheriff's department. On the other hand, a hate incident is an action or behavior that is motivated by hate but is protected by the First Amendment right to freedom of expression. Examples of hate incidents can include name calling, epithets, distribution of hate material in public places, and the display of offensive hate-motivated material on one's property. The freedom guaranteed by the U.S. Constitution, such as the freedom of speech, allows hateful rhetoric as long as it does not interfere with the civil rights of others. Only when these incidents escalate can they be considered an actual crime.

Hate crime statistics compiled by the Federal Bureau of Investigation (FBI) show that a total of two hate crimes were committed in Apple Valley over a five-year period. No hate crimes were committed in Victorville during this time period. Both of the hate crimes committed in Apple Valley were based on race (Table 56). In San Bernardino County as a whole, race based hate crimes were also the most prevalent.

Overall, the incidence of reported hate crimes in Apple Valley and Victorville between 2005 and 2010 was less than one per 1,000 people (0.01 per 1,000 persons). Statistically, the likelihood of hate crimes was higher in Apple Valley and Victorville than in the County of San Bernardino,

which had an incidence rate of 0.005 per 1,000 persons between 2005 and 2010. It should be noted, however, that these statistics may also reflect a higher incidence of reporting crime in certain communities.

Table 56: Hate Crimes (2005-2010)						
Basis of Complaints	Race	Religion	Sexual Orientation	Ethnicity	Disability	Total
<i>Apple Valley</i>						
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	2	0	0	0	0	2
Total	2	0	0	0	0	2
<i>Victorville</i>						
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
Total	0	0	0	0	0	0
<i>San Bernardino County</i>						
2005	1	0	1	1	0	3
2006	2	0	0	0	0	2
2007	2	0	2	0	0	4
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	1	1	0	2
Total	5	0	4	2	0	11

Source: U.S. Department of Justice Federal Bureau of Investigation, 2005-2010.

F. NIMBYism

Many people agree that a variety of housing should be available for people with special needs, such as homeless shelters, affordable housing, and group homes for people with disabilities. However, whether or not these types of housing should be located within their own community is another matter. The following discussion on Not-in-My-Back-Yard sentiment (NIMBYism) is not specific to Apple Valley and Victorville and the discussion is included below simply to provide context for the analysis of SB 1721 and SB 2 that concludes this chapter.

NIMBYism can serve as the most significant constraint to the development of affordable or even market-rate multi-family housing. NIMBYism describes opposition by residents and public

officials alike to additional or different kinds of housing units in their neighborhoods and communities. The NIMBY syndrome often is widespread, deeply ingrained, easily translatable into political actions, and intentionally exclusionary and growth inhibiting. NIMBY sentiment can reflect concerns about property values, service levels, community ambience, the environment, or public health and safety. It can also reflect racial or ethnic prejudice masquerading under the guise of a legitimate concern. NIMBYism can manifest itself as opposition to specific types of housing, as general opposition to changes in the community, or as opposition to any and all development.

Community opposition to high-density housing, affordable housing, and housing for persons with special needs (disabilities and homeless) is directly linked to the lack of such housing options for residents in need. In particular, community opposition is typically strongest against high-density affordable housing and group homes for persons with mental disabilities.

Community residents who are especially concerned about the influx of members of racial and ethnic minority groups sometimes justify their objections on the basis of supposedly objective impacts like lowered property values and increased service costs. Racial and ethnic prejudice often is one root of NIMBYism, although NIMBY concerns still exist where racial or ethnic differences are not involved. The California legislature has passed various Anti-NIMBYism housing bills to prevent communities from rejecting affordable housing projects, including:

- SB 1721: The bill stipulates that a local agency shall not disapprove an affordable housing development project, including agricultural worker housing, or condition approval, including through the use of design review standards, in a manner that renders the project infeasible for development for the use of very low, low or moderate income households.
- SB 2: Expands the Housing Accountability Act, to prohibit localities from denying a proposal to build an emergency shelter, transitional housing or supportive housing if it is needed and otherwise consistent with the locality's zoning and development standards.

Chapter 7: Progress since Previous AIs

This chapter summarizes the key findings of previous AI documents and reviews the progress toward addressing impediments to fair housing choice. Previous AI documents for the Town of Apple Valley and City of Victorville include the following:

- 1999 Town of Apple Valley AI
- 1999 and 2003 City of Victorville AI
- 2007 Apple Valley/Victorville Consortium AI

A. 1999 Town of Apple Valley AI

The following impediments and recommendations were made in the 1999 AI:

Impediment: Public Outreach

There is a general consensus that Apple Valley has a large supply of affordable housing. However, expanded outreach efforts are necessary to disseminate information on housing resources to potential homebuyers and renters.

Recommendations:

- Coordinate with lenders – Efforts are needed to work more closely with lenders to help inform potential homebuyers of these resources.
- Promote fair housing workshops – Efforts are needed to expand the community participation in these workshops, including participation by Town staff and by residential property managers/owners, and particularly those of smaller rental projects.
- Disseminate housing program information – The Victor Valley Association of Realtors in conjunction with the Town could provide written information to area realtors or conduct educational workshops.

Efforts:

- The Town has been proactive, through the Apple Valley Consortium and its own efforts, in informing residents of fair housing practices, and their rights associated with housing. The Town refers residents to the appropriate agency through Town resources, including printed materials, web site information, and personal contact.
- The Town of Apple Valley currently provides fair housing information at Town Hall, the Library, the Senior Center and local churches to inform both landlords and tenants of their rights and responsibilities. The information shall direct landlords and tenants to the Inland Fair Housing & Mediation Board, which has an established dispute resolution program.

- The Town also works with the Inland Fair Housing & Mediation Board (IFHMB) to provide anti-discrimination, landlord/tenant mediation, fair housing training and technical assistance, enforcement of housing rights, administrative hearings, home buyer workshops, lead-based paint programs, and other housing related services for Town residents.
- IFHMB conducts an annual half-day fair housing workshop at Apple Valley Town Hall and Victorville City Hall. Event is marketed to residents, landlords, disadvantaged groups, and other housing professionals.

Impediment: Public Policies and Programs Affecting Housing Development

Overall, the Town has a large inventory of affordable housing. No public policy, program, or standard implemented by the Town of Apple Valley has proven to impede housing development. Nevertheless, the Town should strengthen its position in supporting fair housing practice through the adoption of fair housing policies and monitor the impacts of residential development policies and standards on housing production.

Recommendation:

- Affirm commitment to fair housing law – As a prerequisite for receiving locally administered housing assistance funds, recipients should be required to acknowledge their understanding of fair housing law and affirm their commitment to the law.
- Adopt fair housing goals, policies, and programs in housing element – Upon updating the Apple Valley Housing Element for the 2000-05 planning period, the Town should include specific goals, policies, and programs to affirm the intent to further fair housing choice and to address fair housing issues identified in the 1999 AI.
- Monitor impacts of residential development standards – As part of the Town’s annual report to the State on implementation of its General Plan, the Town will monitor the level of residential development. The Town will also periodically assess the impacts of its development fees, policies, and standards on residential development and identify any mitigating measures as appropriate.

Efforts:

- The Town of Apple Valley places a high priority on increasing the supply of affordable housing through new construction. The Town recently partnered with Apple Valley Happy Trails Villas LP (AVHTV) which is comprised of AOF Golden State Community Development Corporation, a non-profit Community Housing Development Organization (CHDO) and Apple Valley Catalytic Housing, LLC to complete the construction of a 34-unit condominium project that after the completion will be an affordable for-sale home ownership, mixed income project with low and moderate as well as middle income residents occupying the units.

- The Town of Apple Valley prohibits practices that restrict housing choice by arbitrarily directing prospective buyers and renters to certain neighborhoods or types of housing.
- The Town's current Housing Element includes a program (Program 3.A.1) to enforce the handicapped accessibility requirements of Federal fair housing law that apply to all new multi-family residential projects containing four (4) or more units.
- The Town's current Housing Element includes a program (Program 3.B.1) to provide fair housing information at Town Hall, the Library, the Senior Center and local churches to inform both landlords and tenants of their rights and responsibilities. The information shall direct landlords and tenants to the Inland Fair Housing & Mediation Board, which has an established dispute resolution program.
- The Town affirms a proactive posture that will assure that unrestricted access is available to the community.
- The Town's current Housing Element includes a program (Program 1.B.3) to periodically review the Development Code for possible amendments to reduce housing construction costs without sacrificing basic health and safety considerations.

Impediment: Lending Practices

Conventional and government-backed programs accommodate the financing needs of most potential homebuyers. Access to home improvement financing, however, is much more limited. Loan origination rates for home improvement loans are low for both conventional and government-backed programs. Efforts are needed to expand the choices for potential borrowers.

Recommendations:

- Pursue housing rehabilitation/improvement funding - Pursue funding sources, such as the State HOME funds, to support home improvement efforts.
- Promote government-backed mortgage lending - Further outreach in the availability of government-backed lending through lending institutions and the County can expand affordable home ownership opportunities.
- Pursue other homebuyer assistance programs - Apple Valley may pursue other funding sources to provide homebuyer assistance to its low and moderate income residents, including HOME funds, Cal Home funds, NSP funds, and tax exempt bonds.
- Homebuyer education and counseling - Lending institutions should improve counseling of loan applicants regarding the procedures and documentation required for mortgage loan applications.

- Assess lender performance – To encourage active lending by different lenders and to expand the range of choices for potential borrowers, the Town should use the performance of individual lenders as leverage when awarding Town contracts.

Efforts:

- The Town currently operates a Down Payment Assistance Program (DAP). The Town provides very low and low income households with down payment/closing costs assistance toward the purchase of a home within Town limits. The down payment assistance is provided as a deferred loan for up to 30 years, applied to homes with a purchase price of no more than \$362,790.
- The Town also contracts with IFHMB to provide homebuyer education classes (8 hours) to all DAP applicants/recipients.
- The Town has established its own Residential Rehabilitation Loan Program, through the use of CDBG, HOME and CalHome funds. A total of 164 loans have been closed and \$2.4 million has been expended through this program.
- The development community of Apple Valley has been encouraged to participate in a number of mortgage assistance programs. In addition, the Town has utilized NSP-1 and NSP-3 and Cal Home funds, as part of its Down Payment Assistance Program, to provide 21 loans to low and very low income households toward the purchase of their homes, with a total of \$1.2 million expended.
- The Town continues to participate in the Pacific Housing Finance Authority's Homeownership Program. The California Cities Homeownership Authority Lease Purchase Program no longer exists.
- The Town participates in the Apple Valley/Victorville Consortium, which prepared the Consolidated Plan 2007-2012 for the two cities. The Consortium has been successful in establishing an agreement which resulted in a direct allocation of HOME funds.
- The City of Victorville, in partnership with the Town of Apple Valley, is sponsoring a series of free Foreclosure Prevention Workshops funded with a \$50,000 grant from Fannie Mae. These workshops and outreach to high desert households will assist in preventing foreclosures and homelessness thereby stabilizing and revitalizing our communities. The workshops will be facilitated by HUD-approved counseling agencies and will provide valuable information and credible resources for loan modification, repayment, forbearance, short sale, and deed in lieu. As the workshop is general in nature, individual counseling sessions are available for residents that are behind in their mortgage payments or facing foreclosure.

B. 1999 and 2003 City of Victorville AI

The following impediments and recommendations were made in the 1999 and 2003 AI:

Impediments

- **Housing Discrimination:** Fears and prejudices are identified through active (direct actions against certain groups) and passive discrimination (when certain persons avoid residing in certain housing units).
- **Race-Based Discrimination:** Discrimination due to race and/or color warrants further education of property owners and/or property managers regarding their responsibilities to uphold the housing laws.
- **Public Transportation System:** Many residents have complained of the inadequacy of the public transportation system. Complaints cite the lack of an efficient busing system in discouraging people from using public transportation. Without an effective public transportation system, those who rely on it, typically low income households are unable to find housing close to their job locations.
- **Existing Housing Supply:** Deterioration of the existing housing supply is a concern.
- **Housing-Job Balance:** The City is currently experiencing an on-going housing-job imbalance.
- **Safety and Crime:** Neighborhood safety and crime prevention is a concern for the City.
- **Large Family Housing:** There is currently a lack of affordable large family rental housing in the City.

Recommendations

The 1999 and 2003 AI City of Victorville AIs identified the following strategies to address the impediments identified above:

- Provide units that meet the housing standards to serve as decent, safe and sanitary housing
- Fund police services in target areas servicing low-income neighborhoods
- Review all standard City contracts to ensure certain fair housing language is included, such as reporting information regarding ethnicity. All contracts for housing development should be made available to IFHMB for review.
- Conduct training of code enforcement officials to enable them to refer discrimination cases directly to IFHMB.

- Require rental property owners receiving financial assistance from the City to attend a training seminar regarding fair housing practices.
- Require IFHMB to conduct a fair housing training session for City employees.
- Display the fair housing logo with all advertisements taken by the City (Public Notices for CDBG program, etc.).
- Conduct English-As-A-Second Language classes about fair housing law and its application.
- Address preserving the existing housing supply.

Efforts

The City has taken the following actions based on the recommendations identified above:

- Under contract with the City of Victorville, IFHMB investigated all complaints related to housing discrimination and refers them to the appropriate agency.
- The City offered the following programs to assist housing affordability for large families, specifically large renter households:
 - 1) Mortgage Assistance Program - This program provides assistance for homebuyers in the form of closing costs and/or down payments. Through this program, low to moderate income families can obtain the needed assistance in financing the purchase of a home. Focus of this program is on first-time homebuyers, transitioning from renter to owner status.
 - 2) Housing Choice Vouchers - 923 or 63 percent of the Housing Choice Vouchers in Victorville are provided to larger households.
- Fair housing information and tenant-landlord dispute mediation continues to be made available to Victorville residents through the IFHMB. Information and resources are provided to both tenants and landlords regarding their rights and responsibilities. The City of Victorville contracted for provision of these services for City residents. Based on monthly tabulations prepared by the IFHMB, most reported fair housing complaints were from renters complaining about unfair lease and eviction policies.
- The City continued to contract with the IFHMB to provide investigation and counseling assistance to address the alleged violations of federal and state housing laws.
- In August 2006, the City adopted a Reasonable Accommodations in Housing to Disabled or Handicapped Individuals Ordinance. The purpose of this ordinance is to provide a process for individuals with disabilities to make requests for, and be provided,

reasonable accommodation in the application of zoning regulations to housing. This ordinance is administered by the City Development Department.

- The City continued to follow the established protocol for referral of residents with redlining complaints to the appropriate authority.
- The City is committed to minimizing the displacement of lower income and special needs households whenever possible and, where necessary, to ensure that displacement is carried out in an equitable manner.
- As part of the Development Code Update process, the City committed to revising provisions in the Development Code or other portions of the Municipal Code as necessary to ensure that any residential development, transitional housing or emergency shelter is not restrictive because of method of financing, race, sex, national origin, marital status or disability of its owners or intended occupants.
- The City continued to provide financial assistance from CDBG or other funds to IFHMB or other fair housing organization to ensure Fair Housing Education & adherence.
- The City continued to require compliance with ADA standards in all new multifamily and redevelopment projects, and continue to enforce the building code provisions requiring accessible design.
- As part of an ongoing effort to preserve and enhance its residential neighborhoods, the City of Victorville offered federal and state funded home improvement grants, rebates and loans to qualified homeowners. These programs focused on the City Old Town area, where most of the units over 30 years of age are occupied, and on the senior citizen home owners who are often on fixed income and likely to need assistance with basic home maintenance.
- The City tested homes for lead based paint, and provides funding assistance for the removal of the lead-based paint through their Rehabilitation Program.
- The City compiled a list of all existing government assisted multi-family rental projects eligible to change to non-low income housing uses due to loan pre-payment or expiration of rental assistance or deed restrictions.
- The City maintained a list of housing assistance programs through the Affordable Housing Financial Clearinghouse provided by the State Department of Housing and Community Development.

C. 2007 Apple Valley/Victorville Consortium AI

The following is a list of key conclusions of potential impediments identified in the Apple Valley/Victorville Consortium AI:

Impediment: Fair Housing Outreach and Education

Among survey respondents that experienced discrimination, many did not report the incident, because they “did not know where to report” the incident or “did not feel it would make a difference.” While this is not necessarily an impediment to finding housing of one’s choice, it does indicate a potential lack of fair housing knowledge and that the Consortium may wish to address through increased outreach and education.

Recommendations:

- Provide fair housing outreach and education services that will include, but not be limited to at least one of the following components: press releases, public service announcements, cable TV, radio, and newspaper outreach, updates in newsletters and/or other publications, events at the annual fair housing celebration, organized meetings or events relating to fair housing, and participation in community events such as fairs and trade shows. This outreach and education will be targeted to: 1) populations, as outlined in the AI, likely to experience discrimination or be under represented; 2) housing providers (i.e. landlords, property managers, realtors, lending institutions, and managers of public housing); 3) elected and appointed officials of each jurisdiction; and 4) the general public.

Efforts:

- Apple Valley has been proactive, through the Apple Valley Consortium and its own efforts, in informing residents of fair housing practices, and their rights associated with housing. The Town refers residents to the appropriate agency through Town resources, including printed materials, web site information, and personal contact.
- Apple Valley provides fair housing information at Town Hall, the Library, the Senior Center and local churches to inform both landlords and tenants of their rights and responsibilities. The information shall direct landlords and tenants to the IFHMD, which has an established dispute resolution program.
- Apple Valley works with the IFHMD to provide anti-discrimination, landlord/tenant mediation, fair housing training and technical assistance, enforcement of housing rights, administrative hearings, home buyer workshops, lead-based paint programs, and other housing related services for residents.
- Fair housing information and tenant-landlord dispute mediation continues to be made available to Victorville residents through the IFHMB. Information and resources are provided to both tenants and landlords regarding their rights and responsibilities.

Victorville contracts for provision of these services for city residents. Based on monthly tabulations prepared by the IFHMB, most reported fair housing complaints were from renters complaining about unfair lease and eviction policies.

- IFHMB conducts an annual half-day fair housing workshop at Apple Valley Town Hall and Victorville City Hall. Event is marketed to residents, landlords, disadvantaged groups, and other housing professionals.

Impediment: Overcrowding

Among the overcrowded households in the Consortium, the majority were renter-occupied households (63 percent in Apple Valley and 64 percent in Victorville). This may be an indication of a lack of affordable rental units of adequate size to meet the needs of renter households in each jurisdiction.

Recommendations:

- Continue working with developers to identify and pursue all available funding to develop affordable housing, to include large family rentals, units for seniors and the disabled.

Efforts:

- The Town is currently partnering with AMCAL to develop a 50 unit rental project on approximately 4.5 acres for low and moderate income seniors. The site is located on the northwest corner of Dale Evans Parkway and Thunderbird Road. The project will be assisted with RDA funds and tax-exempt bond proceeds.
- Apple Valley has expressly, through the preparation of its Consolidated Plan for the Apple Valley/Victorville Consortium, addressed areas where there are currently identified low income population concentrations to assure that future affordable housing projects are distributed through the community. The Town will continue to implement policies which assure that affordable housing is not located in one neighborhood or area.
- The Apple Valley Housing Element includes a program (Program 1.E.2) that supports the efforts of non-profit organizations, private developers, and the HACSB to obtain State and/or Federal funds for the construction of affordable housing for extremely low, very low and low income households by writing letters of support, and expediting permit processing for projects requiring pre-approval of development projects.
- There have been several Specific Plans approved in Apple Valley, including the Bridle Path Estates and North Pointe. These projects provide for a mix of land uses, including 290 multi-family units and 518 single family homes. These projects are approved, but have not broken any ground yet.

- Victorville utilized its RDA low-moderate income housing set-aside fund. The RDA has subsidized units for Low and Moderate Income households to reside at Northgate Village Apartments.
- Apple Valley and Victorville continues to encourage developers, non-profits and other interested parties to develop new affordable units and will support applications for development funds through the California Tax Credit Allocation Committee (CTCAC) and the State of California.
- Victorville also recently put in place a TEFRA Hearing process to review and/or approve proposed affordable housing projects.
- In July 2010, the Town of Apple Valley and the City of Victorville renewed their HOME Consortium Agreement, formalizing the HOME Program Consortium into one geographically contiguous unit. The HOME Consortium has and will continue to receive funds annually as an entitlement jurisdiction. These funds can be used to create and/or replace affordable housing units.
- Victorville continues to assist with the provision of affordable rental housing through its available zoning and financing tools. The City is proposing a new mixed use zoning designation that is expected to result in thousands of new multifamily units at densities up to 60 dwelling units per acre. The City has and continues to use available financing tools to assist in, providing rental housing affordable to Extremely Low, Very Low, Low and Moderate Income households. The Town of Apple Valley updated its General Plan in 2010, which created a new Mixed Use zoning to facilitate multi-family housing in the community.

Impediment: Section 8 Vouchers

Given the ethnic composition of each jurisdiction, where Black residents make up a relatively small proportion of the population, Black households appear to be over represented in Section 8 voucher distribution in Apple Valley and Victorville. Hispanic households may be slightly underrepresented in Victorville, though not in Apple Valley; indicating a need for greater outreach efforts to other ethnic groups and better coordination with the San Bernardino County Housing Authority to ensure a more even distribution of vouchers.

Recommendations:

- Encourage the HACSB to provide outreach efforts to ensure a more even distribution of Section 8 vouchers relative to the ethnic concentration of each member jurisdiction

Efforts:

- The Town of Apple Valley and City of Victorville coordinate with the HACSB to provide Section 8 Rental Assistance Vouchers to residents.

Impediment: Housing for Persons with Disabilities

Affordability, design, location, and discrimination significantly limit the supply of housing available to persons with disabilities. Most homes are inaccessible to people with mobility and sensory limitations. This may be of potential concern as complaints of discrimination based on disability have risen over the past few years and senior housing is limited in the Consortium.

Recommendations:

- Continue working with developers to identify and pursue all available funding to develop affordable housing, to include large family rentals, units for seniors and the disabled.

Efforts:

- Approximately 1,000 retirement/care units for seniors are located in the Town of Apple Valley.
- The Apple Valley Housing Element includes a program (Program 1.C.3) that, pursuant to State law, requires apartment complexes with 20 or more units to provide a minimum of one handicapped-accessible unit, with two units required of developments over 100 units.
- The Apple Valley Housing Element includes a program (Program 1.C.4) that amends the Development Code to state that handicapped ramps are permitted in the front, side or rear yard setback of any residential structure. A reasonable accommodation procedure shall be established to provide exception in zoning and land use for persons with disabilities.
- Apple Valley enforces the requirements of the Americans with Disabilities Act (ADA) for all construction projects. The Del Webb/Pulte project was constructed to be fully compliant with ADA standards, and includes 63 ADA accessible units. The Town will continue to implement these standards as new projects are brought forward.
- In August 2006, Victorville adopted a Reasonable Accommodations in Housing to Disabled or Handicapped Individuals Ordinance. The purpose of this ordinance is to provide a process for individuals with disabilities to make requests for, and be provided, reasonable accommodation in the application of zoning regulations to housing. This ordinance will comply with Fair Housing Laws, and is administered by the City Development Department.
- Victorville provides grants and loans to low and moderate income disabled persons for accessibility modifications to the single family homes, and assistance to disabled renters. These programs include:
 - 1) Senior/Disabled Home Repair Program (SHRP) - The sponsor of this program is the Economic Development Department of the City of Victorville. This program

provides a one-time grant of labor and materials for eligible senior/disabled homeowners for minor home repairs. Grant amounts are up to \$10,000.

- 2) Shelter Plus Care Program - Provides rental assistance that is either tenant-based, project based, or sponsor-based to maximize independence for disabled homeless persons.
- 3) State Licensed Care Facilities - There are approximately 15 adult home facilities providing care to disabled individuals. These facilities are licensed to care for up to 77 people.

Impediment: Housing Discrimination and Fair Housing Services

Lower Income Persons and Female-Headed Households: Most of the fair housing and landlord/tenant complaints from Apple Valley and Victorville were filed by lower income persons and female-headed households, indicating that these groups may be disproportionately impacted by fair housing issues.

Discrimination Based on National Origin, Race, Familial Status, and Disability: Consistent with recent State-wide trends, the top four discrimination biases in Apple Valley and Victorville were national origin, race, familial status, and disability. As these protected classes may be more susceptible to discrimination, the Consortium may need to focus outreach and education efforts in these areas.

Disproportionate Impact of Black Households: Fair Housing complaints and Landlord/Tenant complaints from Apple Valley indicate that Blacks may be slightly overrepresented given they make up only eight percent of the population and 19 percent of the fair housing complaints and 20 percent of the landlord/tenant complaints. As this group may be more susceptible to discrimination, the Consortium may need to focus outreach and education efforts to this group.

Fair Housing complaints and Landlord/Tenant complaints from Victorville reflected a disproportion of potential housing discrimination among Black households and/or a lack of fair housing knowledge among Hispanic households (Blacks made up 12 percent of the population, 44 percent of fair housing complaints, and 27 percent of landlord tenant complaints. In contrast, Hispanics make up 34 percent of the population, only 18 percent of fair housing complaints, and 25 percent of landlord/tenant complaints). Thus, the Consortium may need to focus outreach and education efforts to these groups.

Tenant/Landlord Complaints: The majority of landlord/tenant complaints from Apple Valley and Victorville involved rights and responsibilities, eviction, and repairs indicating that the Consortium may need to focus outreach and education efforts in these areas.

Recommendations:

- Provide fair housing outreach and education services that will include, but not be limited to at least one of the following components: press releases, public service announcements, cable TV, radio, and newspaper outreach, updates in newsletters and/or other publications, events at the annual fair housing celebration, organized meetings or events relating to fair housing, and participation in community events such

as fairs and trade shows. This outreach and education will be targeted to: 1) populations, as outlined in the AI, likely to experience discrimination or be under represented; 2) housing providers (i.e. landlords, property managers, realtors, lending institutions, and managers of public housing); 3) elected and appointed officials of each jurisdiction; and 4) the general public.

- Provide landlord/tenant rights outreach, education and mediation services that will include, but not be limited to at least one of the following components: press releases, public service announcements, updates in newsletters and/or other publications, events at the annual fair housing celebration, organized meetings or events relating to fair housing, and participation in community events such as fairs and trade shows. This outreach, education and mediation will be targeted to: 1) populations, as outlined in the AI, likely to experience discrimination or be under represented; 2) housing providers (i.e. landlords, property managers, realtors, lending institutions, and managers of public housing); 3) elected and appointed officials of each jurisdiction; and 4) the general public.

Efforts:

- Apple Valley has been proactive, through the Apple Valley Consortium and its own efforts, in informing residents of fair housing practices, and their rights associated with housing. The Town refers residents to the appropriate agency through Town resources, including printed materials, web site information, and personal contact.
- Apple Valley provides fair housing information at Town Hall, the Library, the Senior Center and local churches to inform both landlords and tenants of their rights and responsibilities. The information shall direct landlords and tenants to the IFHMB, which has an established dispute resolution program.
- Apple Valley works with IFHMB to provide anti-discrimination, landlord/tenant mediation, fair housing workshops, training and technical assistance, enforcement of housing rights, administrative hearings, home buyer workshops, lead-based paint programs, and other housing related services for Town residents.
- Fair housing information and tenant-landlord dispute mediation continues to be made available to Victorville residents through the IFHMB. Information and resources are provided to both tenants and landlords regarding their rights and responsibilities. The City of Victorville contracts for provision of these services for City residents. Based on monthly tabulations prepared by the IFHMB, most reported fair housing complaints were from renters complaining about unfair lease and eviction policies.

Impediment: Second Dwelling Units

While the City of Victorville has legally justified their prohibition of second dwelling units, these restrictive conditions may be a potential impediment to the development of affordable housing in the future which should be monitored.

Recommendations:

- Monitor the impact of prohibiting second dwelling units to determine if, at any time, the policy becomes an impediment to fair housing.

Efforts:

- Victorville generally provides homes at more affordable prices compared to most San Bernardino County communities. Interest in second units has been limited.

Impediment: Home Loan Approval Rates

Approval rates by ethnicity in Apple Valley and Victorville indicate that Blacks have lower approval rates than other ethnicities. Given the various factors that contribute to approval rates (credit scores, debt to income ratios, etc.) it is difficult to determine the true reason for this disparity. Thus, the Consortium may need to focus education and outreach efforts in this area or even monitor this issue more thoroughly.

Recommendations:

- Support organizations that provide financial literacy education and outreach to minorities, especially Blacks, in order to improve loan applicant credit worthiness. In addition, the Consortium will monitor and assess HMDA data and if necessary, will seek more specific data in an attempt to detect unlawful activities related to mortgage lending.

Efforts:

- Apple Valley has pursued Neighborhood Stabilization Program funds to expand homeownership opportunities to Town residents. The Town aggressively markets the program to all households. As part of the program outreach, the Town conducts workshops with lenders.
- The Town coordinates with the Hispanic and Black Chambers of Commerce to promote its programs and services.

Impediment: NIMBYism

Given that many residents of Apple Valley and Victorville came to the high desert for larger homes/lots, open space, rural characteristics, and to flee the crime and congestion associated with surrounding counties, NIMBYism may become an issue as both jurisdictions continue to develop to accommodate the rapidly growing population, which may need to be monitored in the future.

Recommendations:

- Work with and encourage housing developers to include community outreach programs as a part of their predevelopment process. Actions could include informational meetings in the neighborhood, door-to-door outreach, contact with existing neighborhood organizations, sponsoring tours of existing affordable housing, and dissemination of information regarding the need for and benefits of affordable housing. In addition, the Consortium could conduct briefings and work sessions with each jurisdiction's Town/City Council to provide decision makers with more information on the Consortiums affordable housing needs and the impact of past and current affordable housing developments.

Efforts:

- The housing crisis and economic recession impacting residents in Victor Valley have educated many residents about affordable housing.
- The Town of Apple Valley has been successful in pursuing affordable housing opportunities, including providing homeownership assistance using NSP and CalHome funds, assisting in the development of a 34-unit condominium project as affordable ownership housing, and pursuing a 50-unit affordable senior rental housing project. In addition, the Town has been awarded \$1,000,000 in CalHome funds for the 2011 NOFA to provide additional funding for the Downpayment Assistance and Residential Rehabilitation Loan Program.

Chapter 8: Fair Housing Action Plan

This chapter presents the previous impediments that continue to impact the Apple Valley/Victorville Consortium area and new impediments identified during the development of this report. Previous impediments carried over to this AI and actions to address the impacts are modified to reflect the current conditions.

A. Carried Over Impediments

Impediment: Housing Discrimination

Housing discrimination persists in both communities, with disability, race, and familial status being the top bases for discrimination. In recent years, housing discrimination against persons with disabilities has increased significantly. Housing advocates also indicate that seniors, persons with disabilities, and large families are often discriminated in the housing market.

Apple Valley	Victorville
<p>Actions:</p> <ul style="list-style-type: none"> • Continue to contract with the IFHMB to provide fair housing services to residents, landlords, and other housing professionals. • Promote the National Fair Housing Month in April each year. • Promote fair housing services available through the IFHMB via City website, newsletter, or other publications. • Require rental property owners receiving financial assistance from the City affirm their commitment to comply with fair housing laws, and attend fair housing training. 	<p>Actions:</p> <ul style="list-style-type: none"> • Continue to contract with the IFHMB to provide fair housing services to residents, landlords, and other housing professionals. • Promote the National Fair Housing Month in April each year. • Promote fair housing services available through the IFHMB via City website, newsletter, or other publications. • Require rental property owners receiving financial assistance from the City affirm their commitment to comply with fair housing laws, and attend fair housing training.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agencies: Community Development Department; IFHMB	Responsible Agencies: Economic Development; IFHMB
Funding Sources: CDBG	Funding Sources: CDBG

Impediment: Public Outreach

Many residents are not aware of fair housing rights and services available. When encountered with fair housing issues, many do not believe reporting the incidents would help the situation. Some are also afraid of retaliation by the owners.

Apple Valley	Victorville
<p>Actions:</p> <ul style="list-style-type: none"> • Provide fair housing outreach and education services that will include, but not be limited to at least one of the following components: press releases, public service announcements, cable TV, radio, and newspaper outreach, updates in newsletters and/or other publications, events at the annual fair housing celebration, organized meetings or events relating to fair housing, and participation in community events such as fairs and trade shows. • Conduct a half-day fair housing workshop at Town Hall annually, targeting residents, landlords, disadvantaged groups, and housing professionals. • Target outreach and education to: <ol style="list-style-type: none"> 1) Populations, as outlined in the AI, likely to experience discrimination or be under represented; 2) Housing providers (i.e., landlords, property managers, realtors, lending institutions, and managers of public housing); 3) Elected and appointed officials of each jurisdiction; and 4) General public. • Publicize outcomes of fair housing lawsuits to encourage reporting of fair housing issues by residents. • Coordinate with minority Chambers of Commerce to promote Town programs and services. 	<p>Actions:</p> <ul style="list-style-type: none"> • Provide fair housing outreach and education services that will include, but not be limited to at least one of the following components: press releases, public service announcements, cable TV, radio, and newspaper outreach, updates in newsletters and/or other publications, events at the annual fair housing celebration, organized meetings or events relating to fair housing, and participation in community events such as fairs and trade shows. • Conduct a half-day fair housing workshop at City Hall annually, targeting residents, landlords, disadvantaged groups, and housing professionals. • Target outreach and education to: <ol style="list-style-type: none"> 1) Populations, as outlined in the AI, likely to experience discrimination or be under represented; 2) Housing providers (i.e., landlords, property managers, realtors, lending institutions, and managers of public housing); 3) Elected and appointed officials of each jurisdiction; and 4) General public. • Publicize outcomes of fair housing lawsuits to encourage reporting of fair housing issues by residents. • Coordinate with minority Chambers of Commerce to promote City programs and services.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agencies: Community Development Department; IFHMB	Responsible Agencies: Economic Development; IFHMB
Funding Sources: CDBG	Funding Sources: CDBG

Impediment: Housing Choice Vouchers and Affordable Housing Units

Hispanic households are underrepresented in Housing Choice Voucher program. However, the Housing Choice Voucher program has closed its waiting list for several years, leaving the HACSB little ability to provide additional vouchers to new households who may reflect the current demographic profile of the County.

In addition to voucher assistance, the HACSB maintains other affordable housing developments with an open waiting list. The City of Victorville also provides financial assistance to facilitate the construction of affordable housing.

Apple Valley	Victorville
Actions: <ul style="list-style-type: none"> Support the HACSB’s efforts in petitioning for additional voucher assistance from HUD. Promote HACSB available resources to households in need. Require rental property owners receiving financial assistance from the City affirm their commitment to comply with fair housing laws, and attend fair housing training. 	Actions: <ul style="list-style-type: none"> Support the HACSB’s efforts in petitioning for additional voucher assistance from HUD. Promote HACSB available resources to households in need. Require rental property owners receiving financial assistance from the City affirm their commitment to comply with fair housing laws, and attend fair housing training.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agency: Community Development Department	Responsible Agency: Economic Development
Funding Sources: General Fund	Funding Sources: General Fund

Impediment: Housing for Persons with Disabilities

Accessible housing units and other housing options (such as transitional and supportive housing) for persons with disabilities are limited in supply.

Apple Valley	Victorville
Actions: <ul style="list-style-type: none"> Amend the Zoning Code to establish a Reasonable Accommodation procedure. 	Actions: <ul style="list-style-type: none"> Amend the Zoning Code to address the provision of transitional housing and supportive housing pursuant to State Housing Element law.
Time Frame: Amend the Zoning Code by 2014	Time Frame: Amend the Zoning Code by 2014
Responsible Agency: Planning	Responsible Agency: Development Department (Planning)
Funding Sources: General Fund	Funding Sources: General Fund

Impediment: Lending Practices

Overall, minority households in Apple Valley and Victorville rely more heavily on smaller, lesser known lenders for mortgage financing, which tend to have more liberal underwriting criteria. While this may promote homeownership to minority households, it may also encourage certain households to overextend financially. Furthermore, most of these lenders do not have local offices, making it hard to mortgage applicants to have in-person meetings with the lenders.

Black households in general, seem to have more difficulty accessing financing. They experienced lower approval rates than other households in the same income group. Since 2007, the rate spreads for all race/ethnic groups have decreased significantly except for Black households. The rate spread for Black households remained the highest among all groups and actually has increased since 2007.

Among the top lenders, minority households also have high fallout rates (not completing or withdrawing an application).

Apple Valley	Victorville
<p>Actions:</p> <ul style="list-style-type: none"> • Work with government agencies and nonprofit groups that provide credit counseling and foreclosure workshops to conduct workshops in the High Desert area. • Conduct lender workshops to provide outreach, education and encourage increasing pool of lenders participating in the DAP program. • Contract IFHMB to monitor lending activities and contact lenders to address potential issues. • Publicize results of HMDA data review to bring attention to the lending community, housing advocates, and the general public. • Coordinate with minority Chambers of Commerce to promote Town and County programs and services, including homebuying assistance, credit counseling, foreclosure counseling, etc. 	<p>Actions:</p> <ul style="list-style-type: none"> • Work with government agencies and nonprofit groups that provide credit counseling and foreclosure workshops to conduct workshops in the High Desert area. • Contract IFHMB to monitor lending activities and contact lenders to address potential issues. • Publicize results of HMDA data review to bring attention to the lending community, housing advocates, and the general public. • Coordinate with minority Chambers of Commerce to promote City and County programs and services, including homebuying assistance, credit counseling, foreclosure counseling, etc.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agencies: Community Development Department; IFHMB	Responsible Agencies: Economic Development
Funding Sources: CDBG	Funding Sources: CDBG

Impediment: Public Transportation System

The County of San Bernardino has invested a majority of its housing resources in areas “down the hill” in the City of San Bernardino. Many lower income households, seniors, and persons with disabilities have difficulty accessing these resources as they are dependent on the public transportation system, which many find difficult to navigate.

Apple Valley	Victorville
Actions: <ul style="list-style-type: none"> • Petition to the County of San Bernardino to expand housing programs and services to the High Desert area. • Provide public transportation maps at public locations. • Include navigating the public transportation system in programs and activities designed for seniors and disabled. 	Actions: <ul style="list-style-type: none"> • Petition to the County of San Bernardino to expand housing programs and services to the High Desert area. • Provide public transportation maps at public locations. • Include navigating the public transportation system in programs and activities designed for seniors and disabled.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agency: Community Development Department	Responsible Agency: Economic Development
Funding Sources: General Fund	Funding Sources: General Fund

B. New Impediments

Impediment: Foreclosures

Both Apple Valley and Victorville are impacted by the large number of foreclosures. Abandoned and foreclosed homes are often vandalized and trespassed, negatively impacting neighborhood safety and conditions. The lack of maintenance of foreclosed properties is a serious issue expressed by many participants of public meetings conducted as part of this AI.

Apple Valley	Victorville
Actions: <ul style="list-style-type: none"> • Continue proactive code enforcement activities to address issues associated with abandoned and foreclosed homes. • Work with lenders holding the homes to ensure a reasonable level of safety and condition is maintained. 	Actions: <ul style="list-style-type: none"> • Continue proactive code enforcement activities to address issues associated with abandoned and foreclosed homes. • Work with lenders holding the homes to ensure a reasonable level of safety and condition is maintained.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agency: Community Development Department	Responsible Agency: Economic Development
Funding Sources: General Fund	Funding Sources: CDBG

Impediment: Real Estate Advertising

Advertising of for-sale homes and particularly rental listings contain potentially discriminatory language. Often such language encourages or discourages a particular group to inquire about the housing available.

Given the market condition, many homes are being used as rentals. Owners of these units may not be professional landlords and therefore are not familiar with fair housing rights and responsibilities.

Apple Valley	Victorville
Actions: <ul style="list-style-type: none"> Contract IFHMB to monitor the advertising of for-sale and for-rent units. Publicize fair housing rights and responsibilities on City website, newsletter, or other publications as a way of outreaching to landlords new to the rental business. 	Actions: <ul style="list-style-type: none"> Contract IFHMB to monitor the advertising of for-sale and for-rent units. Publicize fair housing rights and responsibilities on City website, newsletter, or other publications as a way of outreaching to landlords new to the rental business.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agency: Community Development Department	Responsible Agency: Economic Development
Funding Sources: CDBG	Funding Sources: CDBG

Impediment: Accessibility of Public Facilities

Not all public buildings are accessible to persons with disabilities. Accessible sidewalks with ramps and curb cuts are also needed to allow circulation from one location to another.

Apple Valley	Victorville
Actions: <ul style="list-style-type: none"> Work to improve accessibility in and to public buildings to facilitate participation in civic decisions by persons with disabilities. Annually evaluate the accessibility improvement needs of public facilities through the Capital Improvement Plan process to identify priority projects for funding. 	Actions: <ul style="list-style-type: none"> Work to improve accessibility in and to public buildings to facilitate participation in civic decisions by persons with disabilities. Annually evaluate the accessibility improvement needs of public facilities through the Capital Improvement Plan process to identify priority projects for funding.
Time Frame: Ongoing	Time Frame: Ongoing
Responsible Agencies: Community Development Department; Public Works Department	Responsible Agencies: Economic Development; Public Works Department
Funding Sources: CDBG; Capital Improvement Funds	Funding Sources: CDBG; Capital Improvement Funds

Appendix A: Public Outreach

The Apple Valley/Victorville Analysis of Impediments to Fair Housing Choice (AI) has been developed through a collaborative process including participation of residents, service providers, and Town and City staff. Four primary methods were used to solicit public input for the AI:

Focus group meetings were held in both Apple Valley and Victorville to solicit input from local service providers and representatives from neighboring jurisdictions. This process aimed at reaching agencies that work with lower-income persons and those with special needs to supplement the survey and public meetings associated with the AI preparation. The Town of Apple Valley and the City of Victorville distributed invitation letters to agencies representing a broad range of local service providers and community groups. In total, eight participants attended in Apple Valley, and nine participants attended in Victorville.

Community meetings were held in both jurisdictions in December 2011. On December 8, 2011 in Victorville, four participants attended the community meeting. On December 15, 2011 in Apple Valley, eight participants attended. At the meetings, participants were introduced to the AI process and asked to discuss community needs.

A **community survey** which assessed impediments and barriers to fair housing choice. The survey was posted online (prominently on the front page of both jurisdiction's websites), and hard copies were distributed.

Interviews with service providers were completed over the phone to provide additional information on special needs groups in the Consortium area.

Focus Group Meetings

The Consortium conducted focus group meetings; local service providers and neighboring jurisdictions were invited to provide input from a broad range of special needs groups. This process was intended to reach agencies that work with lower-income and special needs persons to supplement the public meetings and hearings associated with the AI preparation. Service providers and agencies that participated in the focus group meetings included representatives of neighboring jurisdictions, schools, religious institutions, banks and mortgage lenders, domestic violence service providers, food banks, and organizations for minorities.

Summarized notes from the focus group meetings are included in the AI. Lists of agencies, individuals, and organizations that received invitations to the focus group meetings are included below (Tables A-1, A-2, and A-3).

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Catherine	Abbott		24000 Waalew Road	Apple Valley
Bob	Adams	First Mortgage Corp.	15040 7th St.	Victorville
Lupe	Alvarado	Performance Realty	15659 Bear Valley Rd	Hesperia
Naty	Alvarado Jr	Mortgage Solutions of CO	15659 Bear Valley Rd	Hesperia
Lynne	Anderson	Inland Fair Housing & Mediation Board	City Center Building, 10681 Foothill Blvd., Ste. 101	Rancho Cucamonga
Sharon	Archer		15800 Main St. Suite #240	Hesperia
Alicia	Avila		21074 Laguna Road	Apple Valley
Irma	Ayala	High Tech Lending, Inc.	147 S. East End Ave	Pomona
Ronald	Barbieri	Community Development Citizens Advisory Committee	14737 Riverside Drive	Apple Valley
Phillip	Bertrand	MGR Services, Inc.	15428 Civic Dr	Victorville
Art	Bishop	Apple Valley Fire District	22400 Headquarters Drive	Apple Valley
Rene	Bloch	HMS Realty	600 E. Main St	Barstow
Gayle	Bloomingtondale	Comprehensive Housing Services	8840 Warner Avenue	Fountain Valley
Darin	Brawley		11824 Air Expressway	Adelanto
Denise	Brenneise		15411 Village Drive	Victorville
Emmy	Brodell	Alaska USA	15099 Kamana Rd	Apple Valley
Jacqueline	Brown	Community Development Citizens Advisory Committee	19308 Tewa Rd	Apple Valley
Bridgette	Browning		16245 Desert Knoll Dr.	Victorville
Lou	Burgess	Exit Realty	13136 Amargosa Rd.	Victorville
Alvin	Burkett	Prospect Mortgage	9680 Haven Ave	Rancho Cucamonga
Cindi	Burklow		16248 Victor Street	Victorville
Chris	Cardenas	Victor Valley Community Services Council	15208 7th Street, Suite A	Victorville
Frank	Castanos	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Aaron	Christoffersen	Choice Lending	12640 Hesperia Rd	Victorville

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Mike	Clark		20700 Standing Rock Road	Apple Valley
Adolph	Collaso	Primary Residential Mortgage, Inc.	18484 Hwy 18	Apple Valley
Adriana	Collett	Agio Real Estate	20440 Hwy 18	Apple Valley
Val	Collins		15377 Apache Road	Apple Valley
Pedro	Cordova	Century 21 Desert Rock	15311 Bear Valley Road	Hesperia
Ken	Courtney	HMS Realty	11776 Mariposa Rd	Hesperia
Michael	Cullum	MetLife Home Loans	8250 White Oak Avenue	Rancho Cucamonga
Mary	D'Ambra	Union Bank	20254 Hwy 18	Apple Valley
Andrew	Davis	Clearinghouse CDFI	23861 El Toro Rd	Lake Forest
Donald	DeBates	Our Lady of the Desert Church	18386 Corwin Road	Apple Valley
Randy	Deshler	Union Bank	173 Orange St.	Redlands
Alejandra	Diaz	Catholic Charities	16051 Kasota Road, Suite 700	Apple Valley
Margaret	Diaz	Victor Valley Domestic Violence	P.O. Box 2825	Victorville
Joel	Dortch	Happy Trails Children's Foundation	10755 Apple Valley Road	Apple Valley
Beverly	Dudley		14218 Burning Tree Drive	Victorville
Beverly	Earl	Catholic Charities	1450 N. D Street	San Bernardino
Nanci	Edwards		19057 Elm Drive	Apple Valley
Darryl	Evey	Community Development Citizens Advisory Committee	17868 Highway 18	Apple Valley
Dee	Feldmeir		11365 Anderson Street	Loma Linda
Joe	Felicione	Southland Home Loans	15450 W. Sand St	Victorville
Donna	Filadelphia	Assistance League	P.O. Box 39	Apple Valley
Candace	Foster	Desert Castle Realty	7207 SVL Box	Victorville
Mickey	Gallivan		686 E. Mill St.	San Bernardino
Jane	Gardner		15037 Miami Road	Apple Valley
Tom	Gay	Mortgage Solutions of CO	12530 Hesperia Rd	Victorville
Diana	Gomez	Bank of America	16990 Bear Valley Rd	Victorville

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Sandra	Gordon	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Bo	Goulet	Shear Realty	13295 Spring Valley Parkway	Victorville
David	Greiner	Community Development Citizens Advisory Committee	12992 Stonebrook Road	Apple Valley
Craig	Griffin	Guild Mortgage Company	613 W. Valley Pkwy	Escondido
Barbara	Grode		18081 Ranchero Road	Hesperia
Christopher	Guzman		15527 8th Street	Victorville
Paul	Hanson		P.O. Box 2457	Victorville
Dephilip	Harris	Golden Horizon Mtg, Inc.	520 Capitol Mall	Sacramento
Eric	Hasonoff	First Mortgage Corp.	10670 Civic Center	Rancho Cucamonga
Troy	Hazelip	First Mutual Mortgage	2086 South E St	San Bernardino
Jill	Helzer	Paramount Residential Mortgage Group	1265 Corone Pointe Ct	Corona
Curtis	Henderson	Bank of America	16990 Bear Valley Rd	Victorville
T.	Henry	Paramount Residential Mortgage Group	20440 Highway 18	Apple Valley
Emmanuel	Henry-John		P.O. Box 1092	Victorville
Allison	Herbert	American Home Advisors, Inc.	25225 Perch Dr	Dana Point
Debbie	Hietala	Keller Williams Realty	12530 Hesperia Rd	Victorville
Mike	Hinson	Coldwell Banker	14322 Main St	Hesperia
Karen	Hirsch	Mountain West Financial, Inc.	1209 Nevada Street	Redlands
Mike	Hodge	Wells Fargo Home Mortgage, Inc.	1003 E. Brier Dr.	San Bernardino
Don	Holland		P.O. Box 1389	Victorville
Susie	Hollenbeck	High Desert Homeless Services	14049 Amargosa	Victorville
Denise	Huante	Performance Realty	15459 Bear Valley Rd	Hesperia
Winston	Huereque	Coast Cities Financial	15714 Bear Valley Rd	Victorville
Jaime	Huerta	CitiMortgage, Inc.	1745 W. Florida Ave	Hemet
Kara	Hunter	Child Advocates of San Bernardino County	555 N D St., Suite 100	San Bernardino
Bryan	Iverson	Re/Max	PO Box 6936	Big Bear

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Dolores	Jackson		9791 Arrow Route	Rancho Cucamonga
Earlene	Jenkins	Choice Lending	12640 Hesperia Rd	Victorville
Kelly	Johnson		18422 Bear Valley Road	Victorville
Rebecca	Johnson	High Desert Domestic Violence	17100-B Bear Valley Rd	Victorville
Sherriann	Johnson	Countrywide Home Loans	1100 S. Mt. Vernon Ave	Colton
Eric	Johnston		4075 Nielson Road	Phelan
Rafael	Jorge	Agio Real Estate	20440 Hwy 18	Apple Valley
Sara	Kassab	Lee and Associates, Inland Empire	14369 Park Ave	Victorville
Craig	Kelleher	Paramount Residential Mortgage Group	20440 Highway 18	Apple Valley
Frank	Kelly		PO Box 289	Apple Valley
Karen	King	Victor Valley Association of Realtors	11890 Hesperia Road	Hesperia
Ann	Klein		P.O. Box 1550	Redlands
J.	LaDuke		14931 Dale Evans Pkwy.	Apple Valley
Jason	Landon	Hamilton Landon GMAC Real Estate	18888 Hwy 18	Apple Valley
Dave	Larson	Department of Economic & Community Development County of San Bernardino	290 N. "D" Street	San Bernardino
Rachel	Lawler	Century 21 Fairway Realty	18484 Hwy 18	Apple Valley
Brent	Lawrence	First Mortgage Corp.	15040 7th St.	Victorville
Bill	Lennartz		P.O. Box 51149	Riverside
Valerie	Lesnikoff	American Financial Network, Inc.	15316 Dos Palmas Rd	Victorville
Mary Jo	Lewis	Shear Realty	18564 Highway 18	Apple Valley
Debbie	Light	Parker Properties	22573 Hwy 18	Apple Valley
Wally	Linn	East West Bank	12530 Hesperia Road	Victorville
Pamela	Llanos	Premier Home Mortgage	16000 Apple Valley Rd	Apple Valley
Susan	Longoria		14255 Gayhead Road	Apple Valley
Robin	Lucas	Premier Home Mortgage	16000 Apple Valley Rd	Apple Valley
Noelia	Luna	High Country Mortgage	17508 Hercules St	Hesperia

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Ellen	Lutes	Shear Realty	18564 Highway 18	Apple Valley
Mike	Lynch	Choice Lending Group	12138 Industrial Blvd.	Victorville
Kevin	Mahany	St. Mary's Regional Medical Center	18300 Highway 18	Apple Valley
Dale	Marsden		15597 8th Street	Victorville
Carl	Mason		11873 Apple Valley Road	Apple Valley
Vic	McCain		16292 Lime Street	Hesperia
Mike	McCoy Miller	Keller Williams Realty	12209 Hesperia Rd	Victorville
Samuel	McDaniel		P.O. Box 2116	Victorville
Charles	McDonald		8625 C Avenue	Hesperia
Scott	McGookin	City of Hesperia	15776 Main Street	Hesperia
John	McGrath	Housing Authority of the County of San Bernardino	715 E. Brier	San Bernardino
Dori	McKinney	Shear Realty	18564 Hwy 18	Apple Valley
Mark	McKinney		15576 Main Street	Hesperia
Marta	Melendez	Catholic Charities	16051 Kasota Road	Apple Valley
Don	Meza		PO Box 6127	San Bernardino
Francine	Millender	City of Victorville	P.O. Box 5001	Victorville
Trish	Miller		16248 Desert Knolls	Victorville
Inder	Mohan Singh	MGR Real Estate, Inc.	15428 Civic Dr	Victorville
Judy	Morris	Moses House Ministries	P.O. Box 2033	Victorville
Vicki	Murray	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Tonya	Musolino	College GMAC Realty	14767 Bear Valley Rd	Hesperia
Debra	Nichols	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Midge	Nicosia	Victor Valley Community Services Council	P.O. Box 1992	Victorville
Scott	Nolan	South Pacific Financial Corporation	12180 Ridgecrest Rd	Victorville
Barbara	Nova		570 West 4th Street, Suite 102	San Bernardino
Jerry	O'Connor	Shear Realty	15545 Bear Valley Rd	Hesperia
Theresa	Owen	PMAC Lending Services, Inc.	15325 Fairfield Ranch Rd	Chino Hills

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Al	Pasimio	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Janene	Patterson		PO Box 2752	Helendale
Valerie	Paz		19923 Bear Valley Road	Apple Valley
Bob	Pederson	Choice Lending Group	12640 Hesperia Rd	Victorville
Craig	Peterson		1525 N Norma Street, Suite C	Ridgecrest
Darrell	Peterson		15316 Dos Palmas Rd	Victorville
Teri	Phillips		P.O. Box 3554	Apple Valley
Rick	Piercy	Lewis Center for Educational Research	17500 Mana Rd	Apple Valley
Maria	Pisani	Catalyst Lending Inc	PO Box 2833	Apple Valley
Gene	Porter	First Mortgage Corp.	15040 7th St.	Victorville
Debbie	Proper		P.O. Box 2457	Victorville
Amy	Pullen	First Mortgage Corp.	15040 7th Street	Victorville
Lionel	Punchard	First Mortgage	28570 Margeurite Parkway	Mission Viejo
Alba	Quarello	Agio Real Estate	20440 Highway 18	Apple Valley
Monica	Quintana	Mountain West Financial, Inc.	1209 Nevada Street	Redlands
Roy	Quintanar	Alaska USA	15099 Kamana Rd.	Apple Valley
Arlene	Ramirez Navarro	Alaska USA	15099 Kamana Rd	Apple Valley
Ida	Randle	Holy Apostolic Church of God	21938 Thunderbird Road	Apple Valley
Ron	Rector	City of Barstow	220 East Mountain View Street, Suite A	Barstow
Lisa	Reichert	Exit Blaine Associates	16000 Apple Valley Rd	Apple Valley
Lauren	Rendon	High Tech Lending, Inc.	147 S. East End Ave	Pomona
David	Reyna	Neighborhood Housing Services of the Inland Empire	1390 North D St.	San Bernardino
Sonia	Rivera	Guru Financial	18930 Hwy 18	Apple Valley
Cortney	Robles	Artisan Real Estate	14713 Green Tree Blvd	Victorville
Charlotte	Roddy	Parker Properties	22573 US Highway 18	Apple Valley

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Gary	Rogers	Shear Realty	18564 Highway 18	Apple Valley
Bill	Rorick	Community Development Citizens Advisory Committee	19984 Haida Road	Apple Valley
Kenneth	Rose	One 2 One Mentors	P.O. Box 1461	Victorville
Paul	Rozo	Paramount Residential Mortgage Group	1265 Corone Pointe Ct	Corona
Gary	Ruiz	Bank of America	5295 Arlington Ave	Riverside
Marilou	Ryder		16350 Mojave Drive	Victorville
Dinorah	Sanchez	Chase Home Mortgage	827 Tri City Center Dr	Redlands
Karen	Sanchez	Hamilton Landon GMAC Real Estate	18888 Hwy 18	Apple Valley
David	Schulte		15490 Civic Drive # 102	Victorville
Darryl	Self	D. C. Self, Inc	29995 Technology Drive	Murrieta
Steve	Self	City of Adelanto	11600 Air Expressway	Adelanto
Roy	Shannon		1595 Spruce Street	Riverside
Dennis	Shaw	Prudential California Realty	14014 Bear Valley Rd	Victorville
Frank	Shaw	First Mortgage Capital	14176 Amargosa Rd	Victorville
Christy	Shoemaker	Keller Williams Realty	1385 Old Temescal	Corona
Darren	Siegrist		18300 Von Karman	Irvine
Tad	Sikora		502 North Chapel Avenue, Unit D	Alhambra
Darlene	Sims	A Door of Hope Outreach Center	P.O. Box 3744	Apple Valley
Cathy	Smith	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Diane	Smith	Victor Valley Association of Realtors	11890 Hesperia Road	Hesperia
Glenn	Smith	Paramount Residential Mortgage Group	20440 Highway 18	Apple Valley
Jiles	Smith		P.O. Box 20811-D Bear Valley Road, Suite 243	Apple valley
Joshua	Smith	Wells Fargo Home Mortgage, Inc.	1003 East Brier Drive	San Bernardino
Shannon	Smith	Regal Mortgage	18484 Hwy 18	Apple Valley
Tracy	Smith	San Bernardino County Sexual Assault Services	444 N. Arrowhead Avenue	San Bernardino

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
			Suite 101	
Valerie	Smith	Paul Swick Family Center Yucca Loma School	21351 Yucca Loma Road	Apple Valley
Marsha	Sorboh	Apple Valley Christian Centers	11959 Apple Valley Road	Apple Valley
Elisa	Soria	Prime Lending	450 N. Brand Blvd	Glendale
Lin	Staley	High Desert Meals On Wheels	15075 Hesperia Road	Victorville
Candy	Stallings	San Bernardino County Sexual Assault Services	444 N. Arrowhead Avenue Suite 101	San Bernardino
Mary Anne	Stephens	Mortgage Solutions of CO	14075 Hesperia Road	Victorville
George	Stoffels	High Tech Lending, Inc.	147 S. East End Ave	Pomona
Terry	Stover		21600 Corwin Rd	Apple Valley
David	Summers	High Country Mortgage	17508 Hercules St	Hesperia
Antoinette	Sylvester		PO Box 1452	Apple Valley
Mary	Sypkens		18422 Bear Valley Road	Victorville
Paul	Tan	MGR Real Estate, Inc.	15428 Civic Dr	Victorville
Kimberly	Taylor		204 East 110th Street	Los Angeles
Steven	Taylor	Choice Lending Group	12640 Hesperia Rd	Hesperia
Victor	Thornson		22932 Standing Rock Road	Apple Valley
Sassi	Tillman		P.O. Box 7349 Miliken, Unit 140-59	Rancho Cucamonga
Diane	Torrence		13600 Pawnee Road, Unit 7	Apple Valley
Al	Ugo	Bank of America	1100 S. Mt. Vernon Ave	Colton
David	Vail	Choice Lending Group	12640 Hesperia Rd	Victorville
Gabriela	Valdez	Century 21, the OIE Group	5821 Pine Ave	Chino Hills
Maarten	Verwey	Coldwell Banker	9292 SVL Box	Victorville
Bonnie	Viola-Hughes	First Mortgage Corp.	15040 7th St.	Victorville
Sharon	Vonderohe		13897 Choco Road	Apple Valley
Bart	Wade	Regal Mortgage	17260 Bear Valley Rd	Victorville
Trinity	Wallace-Ellis	Child Advocates of San Bernardino County	555 N D St., Suite 100	San Bernardino

Table A-1: Apple Valley Focus Group Meeting Invitees

First Name	Last Name	Company Name	Street Address	City
Larry	Weisz	SB. County Library	14901 Dale Evans Parkway	Apple Valley
Maurine	White		15447 Anacapa Rd., Suite 200	Victorville
Diana	Whittington	Paramount Residential Mortgage Group	9329 Mariposa Road	Hesperia
Joseph	Wiggins	Cal State Home Loans	3752 Arlington Ave	Riverside
Delores	Williams		13554 Delaware Rd.	Apple Valley
Guy E.	Williams		14690 Kokomo Road	Apple Valley
Bob	Witt	High Country Mortgage	17508 Hercules St	Hesperia
Ken	Ynzunza		1257 Columbia Avenue	Riverside
Kele	Younger		P.O. Box 580103	North Palm Springs
Chris	Westlake	CA HCD Division of Financial Assistance	1800Third Street	Sacramento
		Inland AIDS Project	357 W. 2nd St	San Bernardino
Karen	Fricke	Apartment Association Greater Inland Empire	10630 Town Center Drive	Rancho Cucamonga
Carol	Fitzgibbons	Inland Regional Center	PO Box 19037	San Bernardino
Vici	Nagel	High Desert Resource Network	P.O. Box 293928	Phelan
		Apple Valley Senior Club	13188 Central Road	Apple Valley
Janice	Moore	Apple Valley Chamber of Commerce	16010 Apple Valley Road	Apple Valley
		Rolling Start	570 West 4th Street	San Bernardino
MaryRose	Wallace	Habitat for Humanity - San Bernardino Area, Inc.	P.O. Box 1550	Redlands
Julie	Mungai	National CORE	9065 Haven Avenue	Rancho Cucamonga
Jasmine	Borrego	TELACU	1248 Goodrich Blvd	Los Angeles
Gary	Malkus	Calvary Chapel Apple Valley	13601 Del Mar Rd.	Apple Valley
		County of San Bernardino Community Development & Housing	290 N. D Street	San Bernardino

Table A-2: Victorville Focus Group Meeting Invitees

Contact	Organization	Address	City
Jennifer Herman	Able 2 Help Services	14931 Palmdale Rd., # A	Victorville
	ALA-NON and ALA-Teen	15421 6th St.	Victorville
	Alternative Legal Services	14359 Amargosa Rd., Ste. D	Victorville
David Bonifilio	American Cancer Society	14815 7th Street	Victorville
Trish Miller	American Red Cross	16248 Desert Knoll Dr.	Victorville
	California Council for the Blind	P.O. Box 3236	Victorville
Old Town Heritage Preservation	California Route 66 Museum	P.O. Box 2151	Victorville
	Child Development Services Resource & Referral Program	16519 Victor St., Ste 401	Victorville
	Child Protective Services	15480 Ramona Ave.	Victorville
	Compassionate Friends	12530 hesperia Rd.	Victorville
	Community Action Partnership	686 East Mill St.	San Bernardino
Carol Waymire	Desert Communités United Way	15447 Anacapa Rd., Ste 102	Victorville
	Desert Mountain Family Intervention	14360 St. Andrews Dr. # 11	Victorville
	Desert Valley Charitable Foundation	16716 Bear Valley Rd.	Victorville
	Foster Family Network	15490 Civic Drive # 202	Victorville
	Goodwill Industries of Southern California	14580 Seventh St.	Victorville
	Head Start/Preschool Department	14029 Amargosa Rd.	Victorville
Mark Erickson	High Desert Child, Adolescent and Family Services Center	16248 Victor St.	Victorville
	High Desert Foster Parent Association, Inc	P.O. Box 1107	Victorville
Christophe Stewart	High Desert Lodge	13410 Amargosa Rd.	Victorville
Marjori Chambers	High Desert Youth Center	15411 Village Dr.	Victorville
John Salley	Inland Aids Project	16519 Victor St., Ste 203	Victorville
Gina Rabanal	Loving the Lamb Ministries	15437 Anacapa Rd., # 30	Victorville
	Narcotics Anonymous	P.O. Box 1911	Victorville
John Hall	Options for Youth Charter School	16932 Bear Valley Rd.	Victorville

Table A-2: Victorville Focus Group Meeting Invitees

Contact	Organization	Address	City
Suzanne Edson	PAL Humane Society	15632 6th St.	Victorville
	Parents without Partners	P.O. Box 878	Victorville
	Salvation Army Social Services Center	14585 La Paz Drive	Victorville
Brother Gary Hill	Samaritans Helping Hand	15527 8th Street	Victorville
Kristina Nolan	Saras Song of Life Charitable Foundation	15239 Sapphire Ct.	Victorville
	Senior Citizen's Club	14874 Mojave Drive South	Victorville
	Sharon of Rose Life Center	14725 7th St. Ste. 600	Victorville
William Thorton	Shenanigan's Youth Theatre Group	15586 7th St.	Victorville
Bother Gary Hill	St. John of God Health Care Services	13333 Palmdale Rd.	Victorville
Veronica Vaca	The Lord's Table	15512 6th Street	Victorville
	Victim Witness Program	14455 Civic Drive	Victorville
	Victor Valley Adult Reading Program	P.O. Box 753	Victorville
	Victor Valley Community Dental Service Program	15526 7th St.	Victorville
Kathy Davis	Victor Valley Community Hospital Foundation	15248 11th St.	Victorville
Ralph Martinez	Victor Valley Community Services Council	16692 Mojave Dr., Ste A	Victorville
	Victor Valley Rescue Mission	16822 Centre St.	Victorville
James Bess	Victor Valley Toys for Tots	15100 Blackfood Rd.	Victorville
Luther Sweet	Victorville Elks - BPOE 1877	14041 Hesperia Rd.	Victorville
	Visiting Nurse Association of the Inland Counties Hospice Program	12421 Hesperia Rd. # 11	Victorville
Jill Van Balen	Hope Through Housing	9065 Haven Avenue, Suite 100	Rancho Cucamonga
Art Lucero	Unity in Christ	13578 Dean Ave.	Victorville
Chardretta Kessee		14243 Rodeo Dr. Apt 4	Victorville
	Mereno Enterprises		
	Beth Shalom Messianic Congregation	P.O. Box 1383	Victorville
	Bible Baptist Church	12626 First Ave	Victorville
	Burning Bush Baptist Church	P.O. Box 1173	Victorville
	Calvary Chapel Community Center	15081 Center Street	Victorville

Table A-2: Victorville Focus Group Meeting Invitees

Contact	Organization	Address	City
	Cross Roads Cathedral	14262 McArt Road	Victorville
	Desert Rock Church	14411 La Paz Drive	Victorville
	El Bethel Apostolic Faith Church	12970 Palmdale Road	Victorville
	Emmanuel Temple Christian	17288 Stoddard Wells Road	Victorville
	Faith Community Church	11783 Amethyst Road	Victorville
	Fellowship Center Church	16885 Union Street	Victorville
	First Assembly of God	15260 Nisqually Road	Victorville
	First Christian Church	17746 George Blvd.	Victorville
	First Church of the Nazarene	13801 Rodeo Drive	Victorville
	First Missionary Baptist Church	15740 First Street	Victorville
	First Southern Baptist Church	16611 Tracy Street	Victorville
	Friendly Temple of Church of God	16570 E Street	Victorville
	Greater Victory Church of God	15548 6th Street	Victorville
	High Desert Church	14545 Hook Blvd.	Victorville
	High Desert Seventh Day	16663 A Street	Victorville
	Highland's Church	16044 Bear Valley Road, # 3	Victorville
	Holy Innocents Catholic Church	13230 El Evado Road	Victorville
	Hope Chest	15498 Village Drive	Victorville
	Hosanna Christian Fellowship	12402 Industrial Blvd. # F-8	Victorville
	Jehovah's Witness Kingdom Hall	15518 Sunny Vista Road	Victorville
	Jesus and Friends Ministry	15561 7th Street	Victorville
	Living Stones Fellowship	P.O. Box 1514	Victorville
	Lord's Table	15512 6th Street	Victorville
	Mountain View	15518 Sunny Vista Road	Victorville
	Mt. Carmel Community Church	P.O. Box 1098	Victorville
	New Beginning Christian Church	P.O. Box 1694	Victorville
	Oasis Spanish Congregation	15518 Sunny Vista Road	Victorville
	Power House	13890 Palmdale Rd.	Victorville
	Salvation Army	14585 La Paz Dr.	Victorville

Table A-2: Victorville Focus Group Meeting Invitees

Contact	Organization	Address	City
	Set Free	16949 N. D St.	Victorville
	Seventh Day Adventist Church	16070 Lorene Dr.	Victorville
	Spirit of Christ Tabernacle	17111 Stoddard Wells Road	Victorville
	St. Benedict's Ecumenical	13334 Sierra Rd.	Victorville
	St. Francis Episcopal Church	16296 Puesta del Sol	Victorville
	St. Joan of Arc	15512 6th St.	Victorville
	St. John Evangelical Lutheran	16700 Green Tree Blvd.	Victorville
	St. John of God	15534 6th St.	Victorville
	St. Mary Coptic Orthodox Church	14647 Bonanza Road	Victorville
	Trinity Lutheran Church	16138 Molino Dr.	Victorville
	United Methodist Church	15150 La Paz Dr.	Victorville
	Victor Valley Bible Church	P.O. Box 1591	Victorville
	Victor Valley Church of Christ	13150 Sycamore St.	Victorville
	Victor Valley Vineyard Christian	14411 La Paz Dr.	Victorville
	Victorville Church of God	16570 E St.	Victorville
	Victory Outreach Church	11572 Maple Valley Rd.	Victorville
	Zion Lutheran Church	15342 Jeraldo Dr.	Victorville
Jerrod Smith	Omni Community Development	285 West Rialto Ave.	Rialto
Arthur Mertzel	ANR Industries, Inc.		
Tim Piasky	Victory Development	25 N. Santa Anita Avenue, Suite A	Arcadia
Jill Clark	Inland Pacific Contractors	425 West La Cadena Dr #19	Riverside
Peter Kulmaticki	J.D. Pierce Company	2222 Martin Street #100	Irvine
Steven Romero	Mayans Development	22343 La Palma Ave #132	Yorba Linda
Rachel Couvrey	Mercy Housing California	1500 South Grand Ave., Suite 100	Los Angeles
Joseph Michael	Michael Development Corp	11999 San Vicente Blvd # 201	Los Angeles
Ted Buczkowski	Penguin Air	14156 Amargosa Rd., Suite K	Victorville
Chuck Rucker	Rucker Properties & Development	3829 60th St #A	Sacramento

Table A-2: Victorville Focus Group Meeting Invitees

Contact	Organization	Address	City
John O'Toole	Spectrum Home Services	14015 Pioneer Rd.	Apple Valley
Mike Kelley	The Pacific Companies	9929 Hawkview Way	Elk Grove
Jack Hall	Western States Development	15647 Village Drive	Victorville
Julio Macedo	Western Developments of Affordable Housing	3638 University Ave #236	Riverside
	High Desert Hispanic Chamber of Commerce	14286 California Ave, Ste 104	Victorville
	African American Chamber of Commerce	14240 St. Andrews Drive, Ste 101	Victorville
	Korean Chamber of Commerce	9562 Garden Grove Blvd	Garden Grove
	High Desert Resource Network	PO Box 293928	Phelan
	Victorville Chamber of Commerce	14174 Green Tree Blvd	Victorville
Veryle Perkins	Victor Elementary School District	15579 8th Street	Victorville
Patricia Johnson	Victor Valley Union High School District	16350 Mojave Dr	Victorville
Chris Westlake	CA HCD Division of Financial Assistance	1800Third Street	Sacramento
	Inland AIDS Project	357 W. 2nd St #16	San Bernardino
Karen Fricke	Apartment Association Greater Inland Empire	10630 Town Center Drive Suite 116	Rancho Cucamonga
Carol Fitzgibbons	Inland Regional Center	PO Box 19037	San Bernardino
Vici Nagel	High Desert Resource Network	P.O. Box 293928	Phelan
	Apple Valley Senior Club	13188 Central Road	Apple Valley
Janice Moore	Apple Valley Chamber of Commerce	16010 Apple Valley Road	Apple Valley
	Rolling Start	570 West 4th Street Suite 107	San Bernardino
MaryRose Wallace	Habitat for Humanity - San Bernardino Area, Inc.	P.O. Box 1550	Redlands
Julie Mungai	National CORE	9065 Haven Avenue Suite 100	Rancho Cucamonga
Jasmine Borrego	TELACU	1248 Goodrich Blvd	Los Angeles
Gary Malkus	Calvary Chapel Apple Valley	13601 Del Mar Rd.	Apple Valley
	County of San Bernardino Community Development & Housing	290 N. D Street Sixth Floor	San Bernardino
	Hi Desert Meals on Wheels	15075 Hesperia Road	Victorville

Table A-2: Victorville Focus Group Meeting Invitees

Contact	Organization	Address	City
	High Desert Homeless Services	14049 Amargosa Road	Victorville
	Inland Empire United Way	9644 Hermosa Ave.	Rancho Cucamonga
	Legal Aid Society	354 W. 6 th Street	San Bernardino
	Moses House Ministries	P.O. Box 2033	Victorville
	One 2 One Mentors	P.O. Box 3309	Victorville
	Sexual Assault Services	444 N. Arrowhead Ave, Ste 101	San Bernardino
	Victor Valley Domestic Violence	P.O. Box 2825	Victorville
	Inland Fair Housing and Mediation Board	10681 Foothill Blvd., Ste 101	Rancho Cucamonga
	VVTA	17150 Smoketree Street	Hesperia
	Victor Valley Community College	18422 Bear Valley Road	Victorville

Table A-3: Homeless Service Provider Focus Group Meeting Invitees



San Bernardino County Superintendent of Schools
Brenda Dowdy – Homeless Education Program Specialist
(909) 386-2644



Homeless Liaison Contact

District	Liaison	Phone Numbers
Adelanto SD	Robert Guynn, Coordinator of Categorical Programs Angela Smith, Secretary	(760) 246-8691 ext. 10268 (760) 246-8691 ext. 10656
Alta Loma SD	Deidre Moga, Director of Special Education/Pupil Services Shirley Curatolo, Secretary	(909) 484-5151 ext. 2011 (909) 484-5151 ext. 2020
Apple Valley USD	Trenae Nelson, Assistant Supt. of Educational Services Katie Best, Secretary	(760) 247-8001 ext. 1417
Baker Valley USD	Ronda Tremblay, Principal	(760) 733-4567
Barstow USD	Joni James, Director II of Pupil Services Rhonda Powell Administrative Assistant	(760) 255-6028
Bear Valley USD	Diane Hannett, Coordinator of Special Education Tanya Perry, Healthy Start Supervisor	(909) 866 4631 ext. 222 (909) 585-6257
Central SD	Lynda Spicer (interim homeless liaison contact) Interim Director of Special Education Mickey Toomey, Administrative Assistant	(909) 980-3930
Chaffey JUHSD	Bill Bertrand, Deputy Superintendent Lucy Valencia, Outreach Consultant	(909) 988-8511 ext.2818 (909) 985-0966 ext.2726
Chino Valley USD	Laurel Mullally, Director Health Services/Child Development Lilia Martinez, Grant Program Support Specialist	(909) 628-1201 ext. 6769 (909) 628-1201 ext. 8967
Colton JUSD	Todd Beal, Student Services Director Amelia Villalpando, Attendance Clerk	(909) 580-6525 (909) 580-6579
Cucamonga SD	Ric Dahlin, Director Personnel & Pupil Services Claudia Meza, Secretary	(909) 987-8942 ext. 8231
Etiwanda SD	Jean Martin, Administrator of Special Programs Kim Rice, Child, Welfare & Attendance Coordinator	(909) 803-3138

Fontana USD	Bernie Gallagher, Homeless/Foster Youth Liaison	(909) 357-5000 ext. 7089 (909) 587-3681 Work Cell #
Helendale SD	Phillip Tenpenny, Interim Superintendent Kelly Higdon, Administrative Asst.	(760) 952-1180
Hesperia USD	Tom Loomis, Director of Student Services Brenda Hawk, Secretary	(760) 244-4411 ext. 7316
Lucerne Valley USD	Suzette Davis, Superintendent Karol Thompson, Office Manager Lucerne Valley Elementary	(760) 248-6108 ext 4131 (760) 248-7659
Morongo USD	Jolie Kelly, Director of Student Services Wayne Hamilton, Community Outreach Coordinator	(760) 367-9191 ext. 390 (760) 401-0375
Mountain View SD	Mario Gottuso, Director of Student Services	(909) 947-2205
Mt Baldy JUSD	Kevin Vaughn, Superintendent/Principal	909 985-0991
Needles SD	Jim Rolls, Principal/Title I Coordinator	(760) 326-4062
Ontario-Montclair SD	Hector Macias, Executive Director Student & Family Support Services Bonnie Mooney, Coordinator of Family and Collaborative Services	(909) 418-6477 (909) 418-6398
Options for Youth	Raquel Velasco San Bernardino Regional Supervisor	(909) 381-6260
Oro Grande SD	Alma DeSantos Community Liaison	(760) 243-4136
Redlands USD	Jon Best, Director of Student Services Diane Baker, Counselor	(909) 307-5300 ext. 6762 (909) 307-5300 ext. 6726
Rialto USD	Angela Brantley, Child Welfare & Attendance Coordinator	(909) 820-7700 ext. 2352
Rim of the World USD	John Elderkin, Director Special Services Kerry Castillo, Child Welfare & Attendance Office	909 336-4129 (909) 336-4134
San Bernardino City USD	Vicki Lee, Homeless Liaison Telice Ostrinski, Homeless Facilitator	(909) 880-4057
SBCSS-State Preschool	Becky Thams, Manager	(909) 777-0776
SBCSS-Student Services	Vicki Ford, Categorical Coordinator	(909) 777-0778

Silver Valley USD	Micheline Miglis, Assistant Supt. of Education Services Marilyn Mattix, Secretary	(760) 254-2916 ext. 1157
Snowline JUSD	Kathy Sharkey, Director of Communications & Students Services	(760) 868-5817 x7225
Trona JUSD	Charles Raff, Superintendent	(760) 372-2861
Upland USD	Cedric de Visser, Director of Child Welfare & Attendance Rebecca Maynard, Support Services Coordinator	909 985-1864 ext. 258 (909) 949-7804
Victor Elementary SD	Veryle Perkins, Pupil Services Clerk Eva Barriga, Pupil Services Clerk Arlene Cline, Secretary	(760) 245-1691
Victor Valley UHSD	Patricia Johnson, Senior Director Student Services Marla Nye, Administrative Assistant	(760) 955-3200 ext 10292
Yucaipa-Calimesa JUSD	Linda Moffett, Director of K-12 Curriculum Sandra Rutherford, Bilingual Liaison Clerk	(909) 797-0174 ext.129 (909) 797-0174 ext. 214



Consolidated Plan and Fair Housing Focus Group Meeting



Come join fellow Housing Professionals and Service Providers to share your **fair housing** concerns and comments to identify and discuss **neighborhood needs and priorities**. Your input will help us develop strategies to address them!



Where:

Victorville City
Hall
Conference
Room D
14343 Civic
Drive
Victorville, CA
92392

When:

Thursday
December 8, 2011
10:00 AM–12:00 PM

To RSVP or for
more information,
contact:

Tamara N. Torres
(760) 955-5032
ttorres@ci.victorville.ca.us

▶ The City of Victorville will provide reasonable accommodations toward the inclusion of all participants. Please contact Tamara N. Torres at (760) 955-5032. Ample time is required to determine the needs of each request.





Consolidated Plan and Fair Housing Focus Group Meeting



Come join fellow Housing Professionals and Service Providers to share your **fair housing** concerns and comments to identify and discuss **neighborhood needs and priorities**. Your input will help us develop strategies to address them!




Where:

Victorville City
Hall
Conference
Room D
14343 Civic
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Victorville, CA
92392

When:

Thursday
December 8, 2011
10:00 AM–12:00 PM

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contact:
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ttorres@ci.victorville.ca.us

▶ The City of Victorville will provide reasonable accommodations toward the inclusion of all participants. Please contact Tamara N. Torres at (760) 955-5032. Ample time is required to determine the needs of each request. 

Where:

Conference
Center
14975 Dale Evans
Parkway
Apple Valley, CA
92307

When:

Thursday
December 15,
2011
10:00 AM –
12:00 PM



**Consolidated Plan and Fair
Housing Focus Group Meeting**
Come join fellow Housing Professionals and Service
Providers to share your fair housing concerns and
comments and identify and discuss neighborhood
needs and priorities. Your input will help us develop
strategies to address them!



Get a Slice of the Apple

To RSVP or for more information, contact:

Shar Toler

Telephone: (760) 240-7000 ext. 7900

Email: stoler@applevalley.org



The Town of Apple Valley will provide reasonable accommodations toward the inclusion of all participants. Please contact Shar Toler at (760) 240-7000 ext. 7900. Ample time is required to determine the needs of each request.

Donde:

Centro de Conferencia
14975 Dale Evans Parkway
Apple Valley, CA 92307

Cuando:

Jueves, 15 de Diciembre del 2011
10:00 AM – 12:00 PM



Reunión para Grupo de Enfoque Plan Consolidado y Equidad de Viviendas

Venga y comparta con nuestros profesionales de vivienda y proveedores de servicios sus preocupaciones y comentarios de **viviendas justas**. Su contribución nos ayudará a identificar y analizar las **necesidades y prioridades del vecindario** y a desarrollar estrategias para hacerles frente!



Get a Slice of the Apple

Para confirmar su asistencia o
para más información comuníquese con :
Shar Toler
Teléfono: (760) 240-7000 ext. 7900
Correo Electrónico: stoler@applevalley.org



La ciudad de Apple Valley proporcionará ajustes razonables a la inclusión de todos los participantes. Por favor, póngase en contacto con Shar Toler a (760) 240-7000 ext. 7900. Suficiente tiempo es necesario para determinar las necesidades de cada solicitud.

12/8/11

Victorville Focus Mtg

<u>Name</u>	<u>Organization</u>
Vickie Cabriales	HD Hispanic Foundation
Ailene Cannon	Retired Educator (VSSD)
JORGE DURAN	CITY OF VICTORVILLE
PATRICIA JOHNSON	VVUHSD
Karen Hardy	City of Hesperia
Jennifer Wendell	City of Hesperia
GARNER MORRIS	SB COUNTY
Ashley Stradford	VSS-Victorville
Yemela Bell-Gomez	Delta Sigma Theta Sorority

CONSOLIDATED PLAN FOCUS GROUP SIGN-IN SHEET

Project: 5-Year Consolidated Plan & Analysis to Impediments	Meeting Date: December 15, 2011 at 10:00AM
Facilitator: Veronica Tam & Associates/Cindy Amagrande	Place/Room: DSB Conference Room - South

Name	Title	Company	Phone	Fax	E-Mail
Bill Ronick	CR Committee		760 242-7281		bmr81350@verizon.net
Charles Douglas	Church For Whosoever		760 240-1990		maachiar22@kailowil
BART WADE	REGAL MTG		760- 843-3441		bart@regalmontgarehd.com
WALLY LINN	VP	DCB	760 217-0754		wally.linn@msmt.org
Lisa Brunow	Union Bank		760 242-7287		Lisa.Brunow@unionba
Vicki Murray	Underwriter	PRM & Mortgage	760 954-6606		vmurray@PRM&M
Nicole Kraign	Family Assst	Prog. Man	760 843-3070		nicol@familya
Linda Triska	Executive Director	Feed my Sheep in the High Desert	(760) 242-7701	(760) 242-7717	lindatriska@verizon.net

Community Meetings

Apple Valley and Victorville conducted community meetings to gather information and solicit input regarding community needs and priorities, including fair housing issues and concerns. The meetings consisted of a facilitated discussion about community needs and priorities and fair housing issues, followed by an interactive exercise. Participants at each community meeting were given a fixed amount of “HUD Bucks” to spend at a series of exhibits set up around the room.¹ Exhibit boards represented categories of programs and facilities (such as Housing, Community Facilities, and Economic Development). On each exhibit board, envelopes were labeled with specific programs that could be funded with CPD funds. Participants “voted” on their funding priorities by spending the HUD Bucks on the programs or facilities of their choice. For example, a person interested in nothing but parks could spend all of his/her dollars on “Parks and Recreational Facilities” located on the Community Facilities exhibit. Another person wanting more senior programs and road improvements may elect to distribute his/her spending thusly. Following are the notes taken on flip charts from the facilitated discussion and the summarized results of the interactive exercise. Summarized notes from the meeting are included in the AI.

¹ Participants were given \$100 in HUD Bucks at the December 8, 2011 meeting in Victorville. After testing the exercise at the first meeting, it was determined that a larger sum could potentially facilitate more information gathering (as residents could identify more categories in which to fund). Thus, participants were given \$200 in HUD Bucks at the December 15, 2011 meeting in Apple Valley to allocate among the categories of eligible activities.

Community Meeting (Victorville)

Date: December 8, 2011

Time: 6:30 PM

Location: Victorville City Hall, Conference Room D, 14343 Civic Drive, Victorville

Facilitated Discussion Notes:

- Senior Citizen Club
 - Dilapidated building
 - Needs to be ADA compliant
 - Kitchen not capable of doing meals and wheels

- Homeless
 - Need center

- Senior center - has a shack that needs to be torn down

- Unemployment
 - Hard to find employment due to prior records

- Affordable housing
 - Senior

- Housing Condition
 - Apartments not maintained

The public meeting was advertised in the Daily Press on December 2, 2011 and December 7, 2011, as well as El Mojave (a Spanish-language newspaper) on December 3, 2011.

Example Interactive Exercise Board:

CONSOLIDATION PLAN 2012

The Town of Apple Valley and the City of Victorville receive over \$2 million each year from HUD for housing and community development projects. The cities want you to have a voice in how to invest this money. Place your "HUD Bucks" into the envelopes that represent programs that you would most support.

Community Facilities



Senior Centers



Youth Centers



Child Care Centers



Parks & Recreational
Facilities



Health Care Facilities



Community Centers



Fire Stations &
Equipment



Libraries



Education Centers



Youth Activities

Table A-4: Victorville Community Meeting Interactive Exercise Results

Community Facilities	Total HUD Bucks
Senior Centers	
Youth Centers	
Child Care Centers	
Parks & Recreational Facilities	
Health Care Facilities	
Community Centers	
Fire Stations & Equipment	
Libraries	
Education Centers	
Youth Activities	
Housing	Total HUD Bucks
Ownership Housing Rehabilitation	\$20
Rental Housing Rehabilitation	\$10
Homeownership Assistance	\$10
Affordable Rental Housing	\$30
Housing for the Disabled	\$30
Senior Housing	\$50
Housing for Large Families	
Fair Housing Services	
Lead-Based Paint Abatement	\$10
Energy Efficient Improvements	\$10
Economic Development	Total HUD Bucks
Small Business Loans	
Job Creation/Retention	\$50
Employment Training	\$30
Façade Improvements	\$10
Rehab of Commercial Properties	\$10
Community Services	Total HUD Bucks
Senior Services & Activities	\$20
Youth Services & Activities	\$10
Child Care Services	
Transportation Services	\$30
Anti-Crime Programs	\$30
Health Services	
Mental Health Services	\$40
Legal Services	\$10
Food Banks	\$20
Educational Services	\$50
Infrastructure and Neighborhood Improvements	Total HUD Bucks
Flood Drainage Improvement	
Water/Sewer Improvement	
Street/Alley Improvement	
Street Lighting	\$10
Sidewalk Improvements	\$20
Tree Planting	
Code Enforcement	\$30
Special Needs Services	Total HUD Bucks
Centers/Services for Disabled	\$30
ADA Access in Public Facilities	
Domestic Violence Services	\$10
Substance Abuse Services	\$10
Homeless Shelters/Services	\$60
HIV/AIDS Centers/Services	\$10
Neglected/Abused Children Center and Services	\$50



Fair Housing and Consolidated Plan Public Workshop



The City of Victorville will provide reasonable accommodations toward the inclusion of all participants. Please contact Tamara Torres at (760) 955-5032. Ample time is required to determine the needs of each request.

Where:

Victorville City
Hall
Conference
Room D
14343 Civic
Drive
Victorville, CA
92392

When:

Thursday
December 8,
2011
6:30 PM – 8:30
PM



For questions or
additional
information, please
contact:

Tamara N. Torres
(760) 955-5032
ttorres@ci.victorville.ca.

US



Help identify neighborhood needs and priorities and ensure equal access to housing in Victorville! Fill out our Consolidated Plan and Fair Housing Survey at <http://www.victorvillecity.com/> And please join us for a workshop to share your concerns and suggestions!





Sesión de Información Pública de Viviendas Justas y Plan Consolidado



La ciudad de Victorville proporcionará ajustes razonables a la inclusión de todos los participantes. Por favor, póngase en contacto con Tamara N. Torres al (760) 955-5032. Suficiente tiempo es necesario para determinar las necesidades de cada solicitud.

Donde:

Victorville City
Hall
Cuarto de
Conferencia D
14343 Civic
Drive
Victorville, CA
92392

Cuando:

Jueves,
8 de Diciembre
del 2011
6:30 PM – 8:30 PM



Para preguntas o
para mas
información, por
favor póngase en
contacto con :
Tamara N. Torres
(760) 955-5032
ttorres@ci.victorville.ca.us



Ayúdenos a identificar **necesidades y prioridades en la comunidad** para garantizar **oportunidades de igualdad y acceso a viviendas en Victorville!** Complete nuestro formulario del Plan Consolidado y Equidad de Viviendas en www.victorvillecity.com

Por favor acompañenos en una sesión de información para compartir sus opiniones, sugerencias o preocupaciones sobre la comunidad!





Ciudad de Apple Valley Taller Comunitario

Usted está invitado a ayudar a construir una mejor comunidad.

Get a Slice of the Apple.

Para más información, por favor comuníquese con:

Shar Toler
(760) 240-7000 ext. 7900

stoler@applevalley.org

La ciudad de Apple Valley proporcionará ajustes razonables a la inclusión de todos los participantes. Suficiente tiempo para determinar necesidades de cada



EL NOFAVE
12/3/11

El 15 de Diciembre, venga y ayude a la Ciudad de Apple Valley a priorizar cómo se va a gastar el dinero de la comunidad como parte de la actualización de cinco años del Plan Consolidado. Juntos identificaremos las necesidades y prioridades del vecindario y aseguraremos oportunidades de igualdad y acceso a viviendas en Apple Valley. Comparta sus ideas en este importante seminario:

- Participando en discusiones
- Identificando prioridades para la comunidad
- Completando una encuesta corta

Jueves, 15 de Diciembre del 2011

Se proporcionará sin costo alguno.

6:30 PM - 8:30 PM

Centro de Conferencia

14343 Civic Drive

Victorville, CA 92307



Sesión de Información Publico

Ayúdenos a identificar necesidades y prioridades en la comunidad para garantizar oportunidades de igualdad y acceso a viviendas en Victorville! Complete nuestro formulario del Plan Consolidado y Equidad de Viviendas en www.victorvillecity.com

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Por favor acompañenos en una sesión de información para compartir sus opiniones, sugerencias o preocupaciones sobre la comunidad!

Donde:

Victorville City Hall
Cuarto de Conferencia D
14343 Civic Drive
Victorville, CA 92392

Cuando:

Jueves, 8 de Diciembre del 2011
6:30 PM - 8:30 PM



Public Workshop

Help identify neighborhood needs and priorities to ensure equal access to housing in Victorville! Fill out our Consolidated Plan and Fair Housing Survey at www.victorvillecity.com

For questions or additional information, please contact
Tamara N. Torres
(760) 955-5032
ttorres@ci.victorville.ca.us

And please join us for a workshop to share your concerns and suggestions!

Where:

Victorville City Hall
Conference Room D
14343 Civic Drive
Victorville, CA 92392

When:

Thursday, December 8, 2011
6:30 PM - 8:30 PM



Public Workshop

Help identify neighborhood needs and priorities to ensure equal access to housing in Victorville! Fill out our Consolidated Plan and Fair Housing Survey at www.victorvillecity.com

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Tamara N. Torres
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ttorres@ci.victorville.ca.us

And please join us for a workshop to share your concerns and suggestions!

Where:

Victorville City Hall
Conference Room D
14343 Civic Drive
Victorville, CA 92392

When:

Thursday, December 8, 2011
6:30 PM - 8:30 PM



Community Meeting (Apple Valley)

Date: December 15, 2011

Time: 6:30 PM

Location: Apple Valley Conference Center, 14975 Dale Evans Parkway, Apple Valley

Facilitated Discussion Notes:

- Fund cultural art program/events
- No new facilities or new construction
- Maintain existing facilities/services in Apple Valley
- Safe, place to go; then people will stay (stays intact)
- No sidewalks in commercial center.
- Maintain community at high level

- Park and recreation facilities
 - Pool for children/families
 - Activity programs (swimming)
- Activity for kids
- Infrastructure → more jobs

- Economic development
 - Job generation
 - Potential



The public meeting was advertised in the Daily Press on December 13, 2011, as well as El Mojave (a Spanish-language newspaper) on December 3, 2011.

Table A-5: Apple Valley Community Meeting Interactive Exercise Results

Community Facilities	Total HUD Bucks
Senior Centers	\$100
Youth Centers	\$20
Child Care Centers	\$20
Parks & Recreational Facilities	\$120
Health Care Facilities	\$20
Community Centers	\$30
Fire Stations & Equipment	\$50
Libraries	\$40
Education Centers	\$40
Youth Activities	\$90
Housing	Total HUD Bucks
Ownership Housing Rehabilitation	\$20
Rental Housing Rehabilitation	
Homeownership Assistance	\$40
Affordable Rental Housing	\$20
Housing for the Disabled	\$20
Senior Housing	\$30
Housing for Large Families	\$10
Fair Housing Services	
Lead-Based Paint Abatement	
Energy Efficient Improvements	\$30
Economic Development	Total HUD Bucks
Small Business Loans	\$70
Job Creation/Retention	\$210
Employment Training	\$70
Façade Improvements	\$10
Rehab of Commercial Properties	
Community Services	Total HUD Bucks
Senior Services & Activities	\$60
Youth Services & Activities	\$20
Child Care Services	
Transportation Services	
Anti-Crime Programs	\$70
Health Services	\$10
Mental Health Services	\$10
Legal Services	\$10
Food Banks	\$130
Educational Services	
Infrastructure and Neighborhood Improvements	Total HUD Bucks
Flood Drainage Improvement	\$100
Water/Sewer Improvement	\$50
Street/Alley Improvement	\$20
Street Lighting	\$10
Sidewalk Improvements	\$60
Tree Planting	
Code Enforcement	\$80
Special Needs Services	Total HUD Bucks
Centers/Services for Disabled	\$50
ADA Access in Public Facilities	\$20
Domestic Violence Services	\$100
Substance Abuse Services	\$10
Homeless Shelters/Services	\$50
HIV/AIDS Centers/Services	
Neglected/Abused Children Center and Services	\$70

Town of Apple Valley hosts

Community Workshop

You are invited to help build a better community.

On December 15, come and help the **Town of Apple Valley** prioritize how it will spend community dollars as part of its Five Year Consolidated Plan Update.

Together, we'll identify and prioritize neighborhood needs and ensure equal access to housing in Apple Valley.

Share your ideas at this important workshop by:

- Participating in roundtable discussion
- Identifying community priorities
- Completing a short survey



Get a Slice of the Apple.

Thursday, December 15, 2011

Food and beverages will be provided at no cost.

6:30-8:30 p.m.

Apple Valley Conference Center

14975 Dale Evans Parkway

Apple Valley, CA 92307



For more information, please contact:

Shar Toler

(760) 240-7000 x 7900

stoler@applevalley.org



The Town of Apple Valley will provide reasonable accommodations toward the inclusion of all participants. Ample time is required to determine the needs of each request.



Town of Apple Valley Community Workshop

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Get a Slice of the Apple.

For more information, please
contact:

Shar Toler

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stoler@applevalley.org

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Five Year Consolidated Plan Update. Together, we'll identify
and prioritize neighborhood needs and ensure equal access to
housing in Apple Valley. Share your ideas at this important

workshop by:

- Participating in roundtable discussion
- Identifying community priorities
- Completing a short survey

Thursday December 15, 2011

Food and beverages will be provided at no cost.

6:30 PM – 8:30 PM

Apple Valley Conference Center

14975 Dale Evans Parkway

Apple Valley, CA 92307

<http://epaper.vvdailypress.com/Olive/ODE/DailyPress/server/GetContent.asp?contentsrc...> 12/13/2011



Ciudad de Apple Valley Taller Comunitario

Usted está invitado a ayudar a construir una mejor comunidad.

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favor comuníquese con:

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(760) 240-7000 ext. 7900

stoler@applevalley.org

La ciudad de Apple Valley
proporcionará ajustes
razonables a la inclusión de
todos los participantes.

Suficiente tiempo es necesario
para determinar las
necesidades de cada solicitud.



El 15 de Diciembre, venga y ayude a la Ciudad de Apple
Valley a priorizar cómo se va a gastar el dinero de la
comunidad como parte de la actualización de cinco años del
Plan Consolidado. Juntos identificaremos las necesidades y
prioridades del vecindario y aseguraremos oportunidades de
igualdad y acceso a viviendas en Apple Valley. Comparta sus
ideas en este importante seminario:

- Participando en discusiones
- Identificando prioridades para la comunidad
- Completando una encuesta corta

Jueves, 15 de Diciembre del 2011

Alimentos y bebidas se proporcionará sin costo alguno.

6:30 PM – 8:30 PM

Apple Valley Centro de Conferencia

14975 Dale Evans Parkway

Apple Valley, CA 92307

Community Survey

Fair Housing Survey



Get a Slice of the Apple.

Fair housing is a right protected by Federal and State laws. Each resident is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, source of income or any other arbitrary reason.



The Town of Apple Valley and the City of Victorville are conducting an Analysis of Impediments to Fair Housing Choice. We want to hear from you about your experience with fair housing issues and concerns. Please fill out the following survey. Thank you!

1. Please indicate the ZIP Code of your residence _____
2. Have **you** ever experienced discrimination in housing?
 YES NO
3. Who do you believe discriminated against you?
 a landlord/property manager a real estate agent
 a mortgage lender a city/county staff person
4. Where did the act of discrimination occur?
 an apartment complex a condo development
 a single-family neighborhood a public or subsidized housing project
 a trailer or mobilehome park when applying for city/county programs
5. On what basis do you believe you were discriminated against (check all that apply)?
 Race Color Religion
 National Origin Ancestry Gender
 Marital Status Sexual Orientation Age
 Family Status Source of Income Disability
(e.g. single-parent with children, family with children or expecting a child) (e.g. welfare, unemployment insurance) (either you or someone close to you)
 Ethnicity Other (please elaborate: _____)
6. How were you discriminated against?

7. Have you ever been denied "reasonable accommodation" (flexibility) in rules, policies or practices to accommodate your disability?
 YES NO

If YES, what was your request and for what reason were you denied?

8. If you believe you have been discriminated against, have you reported the incident?

YES NO

If NO – Why? don't know where to report afraid of retaliation
 don't believe it makes any difference too much trouble

9. Do you own or rent your residence?

I own my home I am a renter

10. If you own your home, are you in the foreclosure process or at risk of foreclosure?

YES NO

11. If YES, are you in foreclosure or at risk of foreclosure due to (check all that apply):

Loss of income/unemployment
 Monthly Payment is/will increase, we are unable to refinance home to a lower interest rate
 Monthly Payment is/will increase, we are unable to refinance home to a fixed rate loan
 A large one-time payment, built into the structure of the mortgage and due on a specific date, is required
 Significant increases in other housing costs (e.g. insurance, taxes, utilities, etc.)
 I owe more on the home than it is worth so why should I keep paying the mortgage

12. Do you know if any hate crimes have been committed in your neighborhood?

YES NO Don't Know

If YES, what was the basis (check all that apply)

Race Color Religion
 National Origin Ancestry Gender
 Marital Status Sexual Orientation Age
 Family Status Source of Income Disability
 Ethnicity Other (please elaborate: _____)

(Questions 13-14 kept optional; however your response will allow us to better serve the community. Your individual response will be confidential.)

13. What is your race?

White White/Armenian or Middle Eastern Black
 Asian Native American Other

14. Are you of Hispanic origin?

YES NO

THANK YOU!

Encuesta de Viviendas Justas



Get a Slice of the Apple.

La equidad de vivienda es un derecho protegido por las leyes federales y estatales. Cada residente tiene derecho de igualdad y acceso a oportunidades de vivienda sin distinción de raza, color, religión, sexo, origen nacional, discapacidad, estado familiar, estado civil, edad, ascendencia, orientación sexual, fuente de ingresos o cualquier otra razón arbitraria.



La ciudad de Apple Valley y la ciudad de Victorville están llevando a cabo un análisis de los impedimentos para la Equidad de Viviendas. Queremos escuchar su opinión, preocupaciones, y experiencia en temas de equidad de vivienda. Por favor llene el siguiente cuestionario. ¡Gracias!

1. Por favor, indicar el código postal de su residencia _____
2. ¿Alguna vez has sufrido discriminación en una vivienda?
 SI NO
3. ¿Quién cree usted que discriminó en su contra?
 un propietario/gerente de la propiedad un agente de bienes raíces
 un prestamista de hipoteca una ciudad/ miembro del personal del condado
4. ¿Dónde ocurrió el acto de discriminación?
 un complejo de apartamentos un desarrollo de condominios
 un vecindario de una sola familia una vivienda pública o subsidiada
 un remolque o un parque de casas móviles cuando aplique para la ciudad / Programas del condado
5. ¿Por qué cree que fue discriminado (marque lo que corresponda)?
 Raza Color Religión
 Origen Nacional Ascendencia Género
 Estado Civil Orientación Sexual Edad
 Estado Familiar Fuente de ingresos Discapacidad
(por ejemplo, un solo progenitor con hijos, familia con hijos o esperando un niño) (Por ejemplo, ayuda de bienestar, o seguro de desempleo) (usted o alguien cercano a usted)
 Origen étnico Otros (por favor explique: _____)
6. ¿Cómo fue discriminado?

7. ¿Alguna vez ha sido denegado "ajustes razonables" (flexibilidad) en las reglas, políticas o prácticas para adaptarse a su discapacidad?
 SI NO

En caso afirmativo, ¿cuál fue su petición y por qué razón se le negó?

8. Si usted cree que ha sido discriminado, ¿ha reportado el incidente?

SI NO

Si NO - ¿Por qué? no saben dónde denunciar miedo a las represalias
 no creo que haga alguna diferencia demasiados problemas

9. ¿Posee o alquila su residencia?

Soy dueño de mi casa Soy un inquilino

10. Si usted es dueño de su casa, usted está en el proceso de ejecución hipotecaria o en riesgo de ejecución hipotecaria?

SI NO

11. En caso afirmativo, se trata de un embargo o en riesgo de ejecución hipotecaria debido a (marque lo que corresponda):

Pérdida de ingresos / desempleo
 El pago mensual es / irá en aumento, somos incapaces de refinanciar su casa a una menor tasa de interés
 El pago mensual es / irá en aumento, somos incapaces de refinanciar su casa a un préstamo de tasa fija
 Un gran pago único, dentro de la estructura de la hipoteca y, debido a una fecha específica, se requiere
 Aumentos significativos en los costos de vivienda (por ejemplo, seguros, impuestos, servicios, etc)
 Le debo más en el hogar de lo que vale, ¿por qué debo seguir pagando la hipoteca

12. ¿Sabe usted si se han cometido delitos de odio en su vecindario?

SI NO No Se

En caso afirmativo, ¿cuál fue la base (marque lo que corresponda)

Raza Color Religión
 Origen Nacional Ascendencia Género
 Estado Civil Orientación Sexual Edad
 Estado Familiar Fuente de ingresos Discapacidad

Origen étnico Otros (por favor explique: _____)

(Preguntas 13-14 mantenido opcional, sin embargo su respuesta nos permitirá servir mejor a la comunidad. Su respuesta individual será confidencial.)

13. ¿Cuál es su raza?

Blanca Blanco / Armenia o de Oriente Medio Negro
 Asiático Nativos Americanos Otro

14. ¿Es usted de origen hispano?

SI NO

¡GRACIAS!

Service Provider Interviews

As part of the AI outreach process, service providers were interviewed to assess housing and community development needs in Apple Valley and Victorville. This process was intended to reach agencies that work with lower income persons and those with special needs to supplement the public meetings and hearings associated with the AI preparation.

The following list of service providers, supplied by Apple Valley and Victorville, were contacted to conduct one-on-one interviews:

Table A-6: Service Providers		
Agency	Contact	Interviewed
<i>Apple Valley</i>		
Inland Fair Housing and Mediation Board	Jess Torres	Yes
Apple Valley Chamber of Commerce	---	No
The Ramsay Group	Darrel Stamps	No
Millionaire Mind Kids	Delores Williams	No
Moses House Ministries	Matt Coughlin	Yes
High Desert Homeless Services	Maria Hollenbeck	Yes
Assistance League of Apple Valley	Marilyn Anderson	Yes
Victor Valley Community Services	Midge Nicosia	Yes
Community Action Partnership	Marlene Merril	No
<i>Victorville</i>		
Victor Valley Domestic Violence	Margaret Diaz	Yes
City of Victorville: Code Enforcement and demolition programs	Jorge Duran	Yes
City of Victorville: After School Programs	Cheryl Durant	Yes
Legal Aid Society of San Bernardino	Deborah Davis	Yes
San Bernardino Sexual Assault Services	Candy Stallings	Yes

Sources: Christopher Moore, Town of Apple Valley and Liliana Collins, City of Victorville.

A total of ten service providers from both Apple Valley and Victorville who were contacted were available to provide an interview. A summary of comments from the service provider interviews is included below. The notes are divided by service provider.

Inland Fair Housing and Mediation Board, *Jess Torres*

In regards to fair housing, the agency has noticed an increase in dealing with disability issues. Overall, fair housing issues are ongoing and will be encountered for a long time to come. Working through the issues requires that the agency maintains better communication and increasing efforts to report to the City on services available and needed; something that all service agencies could benefit from doing. These efforts would serve to create efficient and more developed education throughout the service arena. Lastly, he contributed that the question needs to more often be asked, what makes for a viable fair housing program? It's not effective to construct a "window dressing program," since HUD requires through CDBG that cities have a fair housing program. Often cities have such name only programs and do not construct real solutions. Also, he said that cities need to make sure they are more active in their development of their Analysis of Impediments. Cities need to become more involved with fair housing provided and become more active, as HUD wants to be aware of where they are taking action and meeting goals as fair housing providers.

Moses House Ministries, *Matt Coughlin*

Housing is an issue that the agency encounters most frequently, including issues such as clients living in overcrowded housing, substandard housing, and having no housing. He stressed that the need for low-income housing was prevalent and that programs such as Section 8 were beneficial, but often difficult to get people on. City facilitation in the future could aid with CDBG funds directed towards housing projects, something directly specific for sustainable low-income housing. To help with facilitation, he stated that the agency would perform a role as a liaison to educate low-income families about aid options available, such as applying for low-income housing and subsidized housing, through a lot of case management work. For years the agency has wanted to move into an atmosphere to have transitional housing available for clients, but no such funding sources have been available. Fair housing issues are pervasive with the entire nearby region he said, in which the cases the agency most commonly encounters includes landlords who are not aware of their full responsibilities. In such cases they direct clients to work with the local housing authority to find solutions. His final suggestion was to reassess the focus in the past, which has largely been on addressing rebuilding programs. The need in the area has always been for more stable housing and the focus should be less about beautification at this point.

High Desert Homeless Services, *Maria Hollenbeck*

She stated that for the most part the agency does not frequently encounter fair housing issues throughout their normal operations. Occasionally the issue arises in which people who have a lot of kids, for example single-mothers with seven or eight kids, struggle to find living accommodations, as most places do not want to rent to them.

Assistance League of Apple Valley, Marilyn Anderson

Within their operations she stated that fair housing issues are not commonly encountered as the parents of recipient children are extremely grateful to receive clothing for their kids and do not take the time to talk about other issues.

Victor Valley Community Services Council, Midge Nicosia

As an agency they refer people to fair housing and legal aid. Fair housing issues encountered in the progress of serving clientele most commonly includes situations in which landlords are not taking care of their property and are assigning blame to seniors. They often come across situations in which seniors get requests for stuff that should be fixed by landlords. She specified that they do not advocate for involvement with fair housing issues, but try to refer those with problems to agencies that can help.

Victor Valley Domestic Violence, Margaret Diaz

The agency for the most part has not encountered issues with fair housing nor do they hear about problems from other sources as they are a provider of transitional housing services.

Legal Aid Society of San Bernardino, Deborah Davis

Overall the agency has experienced a decrease in the amount of fair housing issues encountered while helping clientele. In 2011 they had a need to help people renting properties going into foreclosure, who were paying rent while the owners did not pay their mortgage. The occurrence of this issue has decreased so far in 2012, but the agency still experiences issues with people who become caught up in scams promising loan modifications, especially within the Spanish speaking population. A lot of people that they serve still live in uninhabitable conditions to which the agency helps clients navigate the legal process in order to get a court order requiring the landlord to make repairs. In addition a lot of people simply can't pay for their housing as their income drops, in which case the agency makes an effort to clue people in on reality in order to take proactive steps and prevent issues that may arrive in court and lead to homeless families on the street.

San Bernardino Sexual Assault Services, Candy Stallings

In regards to fair housing issues she revealed that the agency encounters very few cases. The only issue that occasionally comes up during counseling sessions is the difficulties some clientele experience with bi-lingual interactions. When such cases are brought up the agency provides staff that is capable of understanding the problem and they help to direct clientele to other service providers that can be of aid.

Public Hearing Notifications

Draft 1:

TOWN OF APPLE VALLEY NOTICE OF PUBLIC HEARING

Development of the FY 2012-2016 Consolidated Plan First -Year Action Plan for FY 2012-2013 and Analysis of Impediments to Fair Housing Choice for FY 2012-2016

THE PURPOSE OF THIS PUBLIC HEARING IS TO OBTAIN PUBLIC INPUT REGARDING DEVELOPMENT OF THE TOWN'S 2012-2016 FIVE-YEAR CONSOLIDATED PLAN - FIRST -YEAR ACTION PLAN AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR FISCAL YEARS 2012-2016.

THE TOWN NEEDS YOUR INPUT: The Town of Apple Valley announces it will be holding a public hearing at 6:30 p.m., on Tuesday, February 14, 2012, at the Town Council Chambers, located at 14955 Dale Evans Parkway, in the Town of Apple Valley. The Town is soliciting public comments from interested citizens, public agencies and other interested parties regarding the proposed use of Federal funds in the preparation of its 2007 - 2012 Five-Year Consolidated Plan, First-Year Action Plan and the Analysis of Impediments to Fair Housing Choice (AI) for submission to the U.S. Department of Housing and Urban Development (HUD).

The Town of Apple Valley has formed a consortium with the City of Victorville in order to meet the threshold of obtaining Home Investment Partnerships Program (HOME) entitlement status with the U.S. Department of Housing and Urban Development (HUD). The formation of the consortium resulted in an annual allocation of HOME funds to both communities. The consortium has identified the Town of Apple Valley as the lead agency and the City of Victorville as a participating jurisdiction.

A. PARTICIPATION IN THE DEVELOPMENT OF THE CONSOLIDATED PLAN

The Consolidated Plan is a comprehensive five-year strategy (2012 - 2016) that addresses the use of Federal grant/entitlement funds, such as the Community Development Block Grant and Section 108 Guaranteed Loan Program, for the purpose of meeting the goals of providing decent housing, a suitable living environment and expanded economic opportunities, principally for low- and moderate-income persons.

The Consolidated Plan is composed of three parts: 1) The first section of the Consolidated Plan evaluates the Housing and Community Development Needs of the Town of Apple Valley. This includes an assessment of housing needs for low- and moderate-income families, including the needs of homeless individuals and families; 2) Based on this information, a five-year strategic plan will be developed which will include priorities, objectives and accomplishments that are expected to be achieved in the next five years; 3) The First-Year Action Plan will provide a 2012-2013 one-year investment plan which

outlines intended uses of resources, descriptions of activities to be undertaken and the specific objectives and priority needs to be addressed. The First-Year Action Plan is now in the process of development for Fiscal Year 2012-2013.

FEDERAL GRANT PROGRAM DESCRIPTION

Community Development Block Grant

The Federal Housing and Community Development Act of 1974, as amended, provides Federal Community Development Block Grant funds for projects that promote the development of viable, urban communities by providing decent housing and suitable living environments and expanding economic activities, principally for persons of low- and moderate-income. For the 2012-2013 fiscal year, which begins July 1, 2012, the Town of Apple Valley expects to receive *approximately* \$581,607. All CDBG funded projects must meet one of the following national objectives:

- 1) Principally benefit low- and moderate-income persons;
- 2) Eliminate slums and blight; or
- 3) Meet an urgent need

The types of projects and programs which may be considered for funding, subject to National Objectives compliance, include acquisition, disposition, public facilities and improvements, clearance activities, public services, interim assistance, removal of architectural barriers and special economic development activities.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

HOME is authorized under Title II of the Cranston-Gonzales National Affordable Housing Act of 1990. HOME funds may be used to develop and support affordable rental housing and homeownership affordability through acquisition (including assistance to homebuyers), new construction, reconstruction or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations; to provide tenant-based rental assistance, including security deposits; to provide payment of reasonable administrative and planning costs; and to provide for the payment of operating expenses of community housing development organizations (CHDOs).

For the 2012-2013 fiscal year, the Apple Valley/Victorville Consortium anticipates receiving a total of *approximately* \$508,873. Of that amount, Apple Valley and Victorville will receive an *estimated* \$225,293 and \$283,580 respectively. Although applications for HOME funding are not being solicited at this time, public comment regarding housing needs that may be supported by HOME funded activities are welcomed.

THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE STUDY (AI)

Pursuant to Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) regulations, each entitlement community must prepare an

Analysis of Impediments to Fair Housing Choice Study (AI) once in every five-year planning cycle. As part of the Consolidated Plan required by the U.S. Department of Housing and Urban Development (HUD), grantees must submit a certification that it is: (1) Affirmatively furthering fair housing by conducting an Analysis of Impediments to Fair Housing Choice; (2) Taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) Maintaining records that reflect the analysis and actions.

The AI consists of the following components: (1) A comprehensive review of the Town's laws, regulations, and administrative policies, procedures, and practices, (2) An assessment of how these laws affect the location, availability, and accessibility of housing, and (3) An assessment of conditions, both public and private, affecting fair housing choice, including conclusions and general recommendations for actions. The Town must take steps to implement the recommended actions in order for HUD to determine that the Town is taking appropriate affirmative action to further fair housing. The AI will be prepared for the Apple Valley HOME Consortium and will provide separate assessments, conclusions and recommended actions for each of the respective jurisdictions.

As required by HUD, this will be the first of two public hearings to be held during the citizen input process. The second hearing to review the proposed Five-Year Consolidated Plan for 2012-2016 the one-year Action Plan for 2012-2013, and the AI for fiscal years 2012 - 2016 will be held on May 8, 2012.

The Town of Apple Valley is soliciting public comments from interested citizens, public agencies, private non-profit entities and other organizations regarding housing and community development needs, as well as potential or existing impediments to fair housing choice. These concerns may be addressed in the Five-Year Consolidated Plan and the AI. Comments may be submitted in writing or by telephone. Written comments may be sent to:

Town of Apple Valley
Economic Development Department
14955 Dale Evans Parkway
Apple Valley, CA 92307

Telephone contacts should be directed to the Economic Development Department at (760) 240-7000, extension 7900. All written and telephone comments must be received no later than 12:00 p.m., on Tuesday, February 14, 2012.

ANNUAL PROJECT FUNDING AND SOLICITATION OF APPLICATIONS

The Town of Apple Valley is now accepting applications for CDBG funding. The Town expects to receive approximately \$581,607 for fiscal year 2012 - 2013. All eligible organizations and agencies must submit a completed application **no later than 5:00 p.m. on Thursday, March 1, 2012**. Applications are available on the Town's website www.applevalley.org or call the phone number noted above to request an application.

For further information regarding this notice, please contact the Economic Development Department at (760) 240-7000, extension 7900.

Draft 2:

**NOTICE OF PUBLIC HEARING CONCERNING THE PROPOSED 2012-2016 FIVE-
YEAR CONSOLIDATED PLAN AND THE FIRST-YEAR ACTION PLAN
AND
DRAFT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

YOU ARE INVITED - All interested citizens and agencies are invited to attend a public hearing on May 8, 2012, at 6:30 p.m. at the Town of Apple Valley Council Chambers, 14955 Dale Evans Parkway, Apple Valley, CA 92307, to comment on the proposed 2012-2016 Consolidated Plan and First-Year Action Plan as well as the draft Analysis of Impediments to Fair Housing Choice (AI). The Town is soliciting public comments from interested citizens, public agencies and other interested parties regarding the proposed Five-Year Consolidated Plan as well as the draft Analysis of Impediments to Fair Housing Choice . The Town of Apple Valley formed a consortium with the City of Victorville in order to meet the threshold of obtaining Home Investment Partnerships Program (HOME) entitlement status with the U.S. Department of Housing and Urban Development (HUD). The successful formation of the consortium resulted in an annual allocation of HOME funds to both communities. This action requires the Consortium to prepare a joint Consolidated Plan that incorporates community needs assessments, strategies and action plans of both jurisdictions into one coherent plan. Both jurisdictions have also agreed to prepare a joint Analysis of Impediments to Fair Housing Choice. The consortium has identified the Town of Apple Valley as the lead agency and the City of Victorville as a participating jurisdiction.

CONSOLIDATED PLAN SUMMARY - The Consolidated Plan is a comprehensive five-year strategy (2012-2016) that addresses the use of Federal grant/entitlement funds for the purpose of meeting the goals of providing decent housing, a suitable living environment, and expanded economic opportunities principally for low- and moderate-income persons.

The Consolidated Plan combines the application and reporting requirements for four Federal formula grant programs. It replaces the Comprehensive Housing Affordability Strategy (CHAS) and consolidates the applications for the Community Development Block Grant (CDBG), Home Investment Partnerships Act (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

The Consolidated Plan is composed of three parts: 1). The first section of the Consolidated Plan evaluates the Housing and Community Development needs of the Consortium. This includes an assessment of housing needs for extremely low, very low, and, low- and moderate-income families, including the needs of homeless individuals and families. In addition, a housing market analysis was completed that includes a review of housing; 2). Based on this information, a five-year strategic plan has been developed which includes priorities for assisting categories of residents by income level, objective statements, proposed programs, as well as accomplishments that are expected to be achieved in the next five years; 3). An annual Action Plan provides a one-year investment plan, which outlines the intended use of resources, descriptions of activities to be undertaken, and the specific objectives and priority needs to be addressed.

FEDERAL GRANT PROGRAM DESCRIPTIONS

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

The Federal Housing and Community Development Act of 1974, as amended, provides Federal Community Development Block Grant funds for projects that promote the development of viable, urban communities by providing decent housing and suitable living environments and expanding economic activities, principally for persons of low- and moderate-income.

CDBG ANNUAL PROJECT FUNDING

Proposed Funding: The Town expects to receive \$581,334 in CDBG grant funds for FY 2012-2013.

Proposed Projects: The estimated amounts for the following proposed CDBG projects for 2012 - 2013 are outlined below:

• High Desert Homeless Services - Homeless Shelter Program	\$14,716
• Catholic Charities - Emergency Rental/Mortgage Assistance	\$10,716
• Assistance League of Victor Valley	\$14,716
• Inland Fair Housing & Mediation Board - Fair Housing Services	\$13,033
• Inland Fair Housing & Mediation Board - Landlord Tenant Mediation	\$8,008
• Feed My Sheep Ministries - Food Distribution Program	\$8,000
• San Bernardino County Library - Literacy Program	\$5,000
• Victor Valley Community Services Council	\$13,011
• Town of Apple Valley - Residential Rehabilitation Loan Program (RRLP)	\$100,000
• Town of Apple Valley - Thunderbird Park Improvements	\$54,000
• Town of Apple Valley - Village Neighborhood Street Improvements	\$139,520
• Town of Apple Valley - Rehabilitation Administration	\$84,348
• Town of Apple Valley - Program Administration	\$116,266
Total	<hr/> \$581,334

Benefit: At least 70 percent of the total funds received each year must be involved in activities that benefit low- and moderate-income persons. The Town expects to spend 70 percent of its funds to benefit low- and moderate-income individuals during the 2012-2013 program year.

Past Use of Funds: Information on the current Fifth-Year Consolidated Plan and the Town's past use of funds for the CDBG program may be reviewed at the Town of Apple Valley Community Development Department office as well as on the Town's website located at www.applevalley.org

Displacement: No local public action is currently contemplated which would result in the displacement of low- and moderate-income households. If displacement occurs, the Town will implement and fully comply with State and Federal relocation and acquisition statutes.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

HOME is authorized under Title II of the Cranston-Gonzales National Affordable Housing Act of 1990, as amended. HOME funds may be used to develop and support affordable rental housing and homeownership affordability through acquisition (including assistance to homebuyers), new construction, reconstruction or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations; to provide tenant-based rental assistance, including security deposits; to provide payment of reasonable administrative and planning costs; and to provide for the payment of operating expenses of community housing development organizations (CHDOs).

For the 2012-2013 fiscal year, the proposed Apple Valley/Victorville Consortium anticipates receiving a total of \$513,588. Of that amount, Apple Valley and Victorville will receive \$215,476 and \$298,112 respectively.

Apple Valley Proposed Funding: The Town expects to allocate \$513,588 in HOME grant funds for FY 2012-2013 for the period beginning July 1, 2012 and ending June 30, 2013.

Proposed Apple Valley Projects: Proposed HOME projects with estimated amounts for 2012-2013 are outlined below:

• Residential Rehabilitation Loan Program (RRLP)	\$149,839
• Community Housing Development Organization (CHDO)	\$ 29,968
• Program Administration	\$ 35,669
Total	<u>\$215,476</u>

Proposed Victorville Projects: Proposed HOME projects with estimated amounts for 2012-2013 are outlined below:

• Owner Occupied Rehabilitation	\$100,000
• Mortgage Assistance Program (MAP)	\$ 35,352
• Senior Housing Repair Program (SHRP)	\$100,000
• Community Housing Development Organization (CHDO)	\$ 47,070
• Program Administration	\$ 15,690
Total	<u>\$298,112</u>

Document Availability: At this time, the Town has developed a draft 2012-2016 Five-Year Consolidated Plan and a draft First-Year Action Plan for fiscal year 2012-2013. These documents will be available for public review and comment from April 6, 2012 through May 8, 2012 at the following locations:

- Apple Valley Library: 14901 Dale Evans Parkway
- Apple Valley Development Services Building.: 14975 Dale Evans Parkway
- Town of Apple Valley Town Clerk's Office: 14955 Dale Evans Parkway
- Website: www.applevalley.org

CITIZEN PARTICIPATION PLAN - The Town of Apple Valley is required to adopt a Citizen Participation Plan that sets forth policies and procedures for citizen participation with regard to U.S. Department of Housing and Urban Development (HUD) grant/entitlement programs. The Town's Citizen Participation Plan has been adopted in conformance with the provisions of the Consolidated Submission Final Rule Section 91.105. Copies of the adopted Citizen Participation Plan are available for review at the same locations specified above for the Consolidated Plan.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

The AI reviews and analyzes the following types of information and issues/concerns:

1. Analysis of the community profile to include demographic profile, income distribution, housing stock characteristics, and access to public transportation to determine the development of housing patterns in relation to race, ethnicity, income and other characteristics.
2. Evaluation of fair housing complaints and violations to identify trends and patterns.
3. Analysis of public and private activities that may impede fair housing choices including, but not limited to housing brokerage services and financing assistance, public policies and actions affecting the construction of affordable housing, and administrative policies concerning community development and housing activities.
4. Assessment of current public and private fair housing programs and activities.
5. Provision of conclusions and recommendations to further fair housing choice

Public Hearing: The Town of Apple Valley encourages the participation by all residents in the process of developing the 2012-2016 Five-Year Consolidated Plan and Analysis of Impediments to Fair Housing Choice. Comments and input regarding needs and strategies to be addressed in the Five-Year Consolidated Plan or Analysis of Impediments to Fair Housing Choice may also be submitted in writing or by telephone.

The Town of Apple Valley and the City of Victorville will each hold a public hearing regarding the proposed uses of each communities respective CDBG and HOME allocations along with the draft Analysis of Impediments to Fair Housing Choice at the following locations:

May 8, 2012 at 6:30 p.m.
 Town of Apple Valley
 Town Council Chambers
 14955 Dale Evans Parkway
 Apple Valley, CA 92307

May 1, 2012 at 7:00 p.m.
 City of Victorville
 City Council Chambers
 14343 Civic Drive
 Victorville, CA 92392-2399

Comments regarding the draft 2012-2013 Five-Year Consolidated Plan and the draft First-Year Action Plan as well as the Analysis of Impediments to Fair Housing Choice as it pertains to Apple Valley for fiscal year 2012-2013 may be submitted in writing and sent to:

Town of Apple Valley
Community Development Department
14975 Dale Evans Parkway
Apple Valley, CA 92307

All written comments must be received by 5:00 P.M. on Monday, May 8, 2012.

In compliance with the Americans with Disabilities Act, if you require special assistance to participate in this meeting, please call Christopher Moore 48 hours prior to the meeting to ensure that the Town will be able to make reasonable arrangements.

Questions concerning this notice can be answered by contacting Christopher Moore at the Town of Apple Valley (760) 240-7000 extension 7921.

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PROOF OF PUBLICATION

(2015.5 C.C.P.)

**STATE OF CALIFORNIA,
County of San Bernardino**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the publisher of the DAILY PRESS, a newspaper of general circulation, published in the City of Victorville, County of San Bernardino, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, under the date of November 21, 1938, Case number 43096, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

January 13

All in the year 2012.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated this: 13th day of January, 2012.

Leslie Jacobs
Signature
Leslie Jacobs

This space is the County Clerk's Filing Stamp

**Proof of Publication of
NOTICE OF PUBLIC
HEARING**

PROJECT DESCRIPTION	PROPOSED DESCRIPTION
<p>TOWN OF APPLE VALLEY NOTICE OF PUBLIC HEARING</p> <p>Development of the FY 2012-2016 Consolidated Plan First Year Action Plan for FY 2012-2013 and Analysis of Impediments to Fair Housing Choice for FY 2012-2016.</p> <p>THE PURPOSE OF THIS PUBLIC HEARING IS TO OBTAIN PUBLIC INPUT REGARDING DEVELOPMENT OF THE TOWN'S 2012-2016 FIVE-YEAR CONSOLIDATED PLAN, FIRST YEAR ACTION PLAN AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR FISCAL YEARS 2012-2016.</p> <p>THE TOWN NEEDS YOUR INPUT. The Town of Apple Valley announces it will be holding a public hearing at 6:30 p.m. on Tuesday, February 14, 2012, at the Town Council Chamber, located at 14955 Dale Evans Parkway in the Town of Apple Valley. The Town is soliciting public comments from interested citizens, public agencies and other interested parties regarding the proposed use of federal funds in the preparation of its 2012-2016 Five-Year Consolidated Plan, First Year Action Plan and the Analysis of Impediments to Fair Housing Choice (AI) for submission to the U.S. Department of Housing and Urban Development (HUD).</p> <p>The Town of Apple Valley has formed a consortium with the City of Victorville in order to meet the threshold of obtaining Home Investment Partnerships Program (HOME) entitlement status with the U.S. Department of Housing and Urban Development (HUD). The formation of the consortium resulted in an annual allocation of HOME funds to both communities. The consortium has identified the Town of Apple Valley as the lead agency and the City of Victorville as a participating jurisdiction.</p> <p>PARTICIPATION IN THE DEVELOPMENT OF THE CONSOLIDATED PLAN</p> <p>The Consolidated Plan is a comprehensive five-year strategy (2012 - 2016) that addresses the use of Federal grant/entitlement funds, such as the Community Development Block Grant and Section 108 Guaranteed Loan Program, for the purpose of meeting the goal of providing decent housing, a suitable living environment and expanded economic opportunities, principally for low- and moderate-income persons.</p> <p>The Consolidated Plan is composed of three parts: 1) The first section of the Consolidated Plan evaluates the Housing and Community Development Needs of the Town of Apple Valley. This includes an assessment of housing needs for low- and moderate-income families, including the needs of homeless individuals and families; 2) Based on this information, a five-year strategic plan will be developed which will include priorities, objectives and accomplishments that are expected to be achieved in the next five years; 3) The First Year Action Plan will provide a 2012-2013 one-year, commitment plan which outlines intended uses of resources, descriptions of activities to be undertaken and the specific objectives and priority needs to be addressed. The First Year Action Plan is now in the process of development for Fiscal Year 2012-2013.</p>	<p>Community Development Block Grant. The Federal Housing and Community Development Act of 1974, as amended, provides Federal Community Development Block Grant funds for projects that promote the development of viable, urban communities by providing decent housing and suitable living environments and expanding economic activities, principally for persons of low- and moderate-income.</p> <p>For the 2012-2013 fiscal year, which begins July 1, 2012, the Town of Apple Valley expects to receive approximately \$581,697 of HUD funded projects must meet one of the following national objectives:</p> <ol style="list-style-type: none"> 1) Principally benefit low- and moderate-income persons; 2) Eliminate slums and blight; 3) Meet an urgent need. <p>The types of projects and programs which may be considered for funding, subject to National Objectives, comprise, but are not limited to: acquisition, disposition, public facilities and improvements, clearance activities, public services, interim assistance, removal of architectural barriers and special economic development activities.</p> <p>HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)</p> <p>HOME is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act of 1990. HOME funds may be used to develop and support affordable rental housing and home ownership opportunities through acquisition (including at-risk to homelessness), new construction, reconstruction or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site preparation, conversion, demolition, and other expenses, including financing costs, relocation of persons of any displaced persons, families, businesses, or organizations; to provide tenant-based rental assistance, including security deposits; and to provide payment of reasonable administrative and planning costs; and to provide for the payment of operating expenses of community housing development organizations (CHDOs).</p> <p>For the 2012-2013 fiscal year, the Apple Valley/Victorville Consortium anticipates receiving a total of approximately \$508,873 of that amount, Apple Valley and Victorville will receive an estimated \$225,298 and \$283,580, respectively. Although applications for HOME funding are not being solicited at this time, public comment regarding housing needs that may be supported by HOME funded activities are welcomed.</p> <p>THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE STUDY (AI)</p> <p>Pursuant to Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) regulations, each entitlement community must prepare an Analysis of Impediments to Fair Housing Choice Study (AI) once in every five-year planning cycle. As part of the Consolidated Plan required by the U.S. Department of Housing and Urban Development (HUD), grantee must submit a certification that it is: (1) Affirmatively furthering fair housing by conducting an Analysis of Impediments to Fair Housing Choice; (2) Taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) Maintaining records that reflect the analysis and actions.</p> <p>The AI consists of the following components: (1) A comprehensive review of the town's laws, regulations, and administrative policies, procedures, and practices; (2) An assessment of how these laws affect the location, availability, and accessibility of housing; and (3) An assessment of conditions, both public and private, affecting fair housing choice, including conclusions and general recommendations for actions. The Town must take steps to implement the recommended actions in order for HUD to determine that the Town is taking appropriate affirmative action to further fair housing. The AI will be prepared for the Apple Valley HOME Consortium and will provide separate assessments and recommendations for each of the respective jurisdictions.</p> <p>As required by HUD, this will be the first of two public hearings to be held during the citizen input process. The second hearing to review the proposed Five-Year Consolidated Plan for 2012-2016 the one-year Action Plan for 2012-2013, and the AI for fiscal years 2012 - 2016 will be held on May 8, 2012.</p> <p>The Town of Apple Valley is soliciting public comments from interested citizens, public agencies, private non-profit entities and other organizations regarding housing and community development needs, as well as potential or existing impediments to fair housing choice. These comments may be addressed in the Five-Year Consolidated Plan and the AI. Comments may be submitted in writing, or by telephone. Written comments may be sent to:</p> <p>Town of Apple Valley Economic Development Department 14955 Dale Evans Parkway Apple Valley, CA 92107</p> <p>Telephone contacts should be directed to the Economic Development Department at (760) 240-7000, extension 7900. All written and telephone comments must be received no later than 12:00 p.m. on Tuesday, February 14, 2012.</p> <p>ANNUAL PROJECT FUNDING AND SOLICITATION OF APPLICATIONS</p> <p>The Town of Apple Valley is now accepting applications for CDBG funding. The Town expects to receive approximately \$381,697 for fiscal year 2012 - 2013. All eligible organizations and agencies must submit a completed application no later than 5:00 p.m. on Thursday, March 1, 2012. Applications are available on the Town's website www.applevalley.org or call the phone number noted above to request an application.</p> <p>For further information regarding this notice, please contact the Economic Development Department at (760) 240-7000, extension 7900.</p> <p>Published in the Daily Press January 13, 2012 (p.137)</p>

Valley Wide Newspapers

Apple Valley News
P.O. Box 1147
21940 Hwy 18 Unit B
Apple Valley, CA 92307
(760) 242-1930
Adjudication No. 69754

Hesperia Resorter
P.O. Box 400937
16925 Main St
Hesperia CA 92345
(760) 244-0021
Adjudication No. 114788

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APR 09 2012
FINANCE DEPARTMENT

Adelanto Bulletin
P.O. Box 673
17767 Adelanto Rd. #B
Adelanto, CA 92301
(760) 246-6822
Adjudication No.
VCV006222 & VCV012959

County Legal Reporter
P.O. Box 2728
15490 Civic Dr. Suite 204
Victorville, CA 92393
(760) 243-8022
Adjudication No.
VCV019015

Main Accounting Office: P.O. Box 400937, Hesperia, CA 92340

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA,
County of San Bernardino

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of the:

ADELANTO BULLETIN
APPLE VALLEY NEWS
HESPERIA RESORTER
COUNTY LEGAL REPORTER

Newspapers of general circulation published every Thursday or Friday in Adelanto, Apple Valley, Hesperia, or Victorville, California, County of San Bernardino, and which newspapers have been adjudged newspapers of general circulation by the Superior Court of the County of San Bernardino, State of California, under the dates of: ADELANTO BULLETIN: July 11, 1995, Case Number VCV012959, and for the City of Adelanto, Case Number VCV00222; APPLE VALLEY NEWS: January 13, 1997, Case Number 69754, Case Number VCV011254; HESPERIA RESORTER: July 23, 1997, Case Number 114788; COUNTY LEGAL REPORTER: March 30, 1998 Case Number VCV019015; that the notice, of which the annexed is a printed copy (set in type not smaller than non-pareil), has been published in each regular and entire issue of said newspapers and not in any supplement thereof on the following dates, to wit:

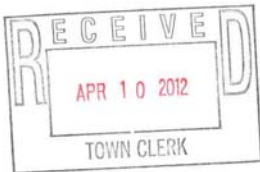
April 6, 2012

all in the years 2012

I certify (or declare) under penalty of perjury that the foregoing is true and correct.
Dated at Hesperia,

California, this 6th day of April, 2012

Anda Harley
Signature



This space is for the County Clerk's Filing Stamp

TOWN OF APPLE VALLEY
NOTICE OF PUBLIC HEARING
CONCERNING THE PROPOSED
2012-2016 FIVE-YEAR CONSOLIDATED PLAN AND THE FIRST-YEAR ACTION PLAN
AND
DRAFT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

YOU ARE INVITED - All interested citizens and agencies are invited to attend a public hearing on May 8, 2012, at 6:30 a.m. at the Town of Apple Valley County Chambers, 14955 Dale Evans Parkway, Apple Valley, CA 92307, to comment on the proposed 2012-2016 Consolidated Plan and First-Year Action Plan as well as the draft Analysis of Impediments to Fair Housing Choice (AI).

The Town is soliciting public comments from interested citizens, public agencies and other interested parties regarding the proposed Five-Year Consolidated Plan as well as the draft Analysis of Impediments to Fair Housing Choice. The Town of Apple Valley formed a consortium with the City of Victorville in order to meet the threshold of obtaining Home Investment Partnerships Act (HOME) entitlement status with the U.S. Department of Housing and Urban Development (HUD). The successful formation of the consortium resulted in an annual allocation of HOME funds to both communities.

This action requires the Consortium to prepare a joint Consolidated Plan that incorporates community needs assessments, strategies and action plans of both jurisdictions into one coherent plan. Both jurisdictions have also agreed to prepare a joint Analysis of Impediments to Fair Housing Choice. The consortium has identified the Town of Apple Valley as the lead agency and the City of Victorville as a participating agency.

CONSOLIDATED PLAN SUMMARY
The Consolidated Plan is a comprehensive five-year strategy (2012-2016) that addresses the use of Federal grant-funding for the purpose of meeting the goals of providing decent housing, a suitable living environment, and expanded economic opportunities principally for low- and moderate-income persons. The Consolidated Plan combines the application and reporting requirements for four Federal formula grant programs. It replaces the Comprehensive Housing Affordability Strategy (CHAS) and consolidates the applications for the Community Development Block Grant (CDBG), Home Investment Partnerships Act (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

The Consolidated Plan is composed of three parts: 1) The first section of the Consolidated Plan is Housing and Community Development needs of the Consortium. This includes a review of housing needs for extremely low, very low, and low and moderate-income families, including the needs of homeless individuals and families. In addition, a housing market analysis has been developed which includes priorities for assisting categories of residents by income level, objective statements, proposed programs, as well as accomplishments that are expected to be achieved in the next five years; 2) An annual Action Plan provides a one-year investment plan, which outlines the intended use of resources, descriptions of activities to be undertaken, and the specific objectives and priority needs to be addressed.

FEDERAL GRANT PROGRAM DESCRIPTIONS
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
The Federal Housing and Community Development Act of 1974, as amended, provides Federal Community Development Block Grant funds for projects that promote the development of viable, urban communities by providing decent housing and suitable living environments and expanding economic activities, principally for persons of low and moderate-income.

CDBG ANNUAL PROJECT FUNDING
Proposed Funding: The Town expects to receive \$334 in CDBG grant funds for FY 2012-2013.
Proposed Projects: The estimated amounts for the following proposed CDBG projects for 2012 - 2013 are outlined below:
High Desert Homeless Services - Homeless Shelter Program \$14,716
Catholic Charities - Emergency Rental/Mortgage Assistance \$10,716
Assistance League of Victor Valley \$14,716
Inland Fair Housing & Mediation Board - Fair Housing Services \$13,033

REHABILITATION LOAN PROGRAM (RLRP) \$100,000
Fees My Sheep Ministries - Food Distribution Program \$8,000
San Bernardino County Library - Literacy Program \$5,000
Victor Valley Community Services \$13,011
Town of Apple Valley - Residential Rehabilitation Loan Program (RRLP) \$100,000
Town of Apple Valley - Thunderbolt Paleontological Improvements \$54,000
Town of Apple Valley - Village Neighborhood Street Improvements \$19,500
Town of Apple Valley - Rehabilitation Administration \$84,348
Town of Apple Valley - Program Administration \$581,334 \$116,266 (AI)

Benefit: At least 70 percent of the total funds received each year must be involved in activities that benefit low- and moderate-income persons. The Town expects to spend 70 percent of its funds to benefit low- and moderate-income individuals during the 2012-2013 program year.

Past Use of Funds: Information on the current Five-Year Consolidated Plan and the Town's past use of funds for the CDBG program may be reviewed at the Town of Apple Valley Community Development Department office as well as on the Town's website located at www.applevalley.org.

Displacement: No local public action is currently contemplated which would result in the displacement of low- and moderate-income households. If displacement occurs, the Town will displace and fully comply with State and Federal relocation and acquisition statutes.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)
HOME is authorized under Title II of the Cranston-Gonzales National Affordable Housing Act of 1990, as amended. HOME funds may be used to develop and support affordable rental housing and homeownership affordability through acquisition (including assistance to homebuyers), new construction, reconstruction or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses or organizations; to provide tenant-based rental assistance, including direct assistance; to provide payment of reasonable administrative and planning costs; and to provide for the payment of operating expenses of community housing development organizations (CHDOs).

For the 2012-2013 fiscal year, the proposed Apple Valley/Victorville Consortium anticipates receiving a total of \$513,588. Of that amount, Apple Valley and Victorville will receive \$215,476 and \$298,112 respectively.

Apple Valley Proposed Funding: The Town expects to allocate \$513,588 in HOME grant funds for FY 2012-2013 for the period beginning July 1, 2012 and ending June 30, 2013.
Proposed Apple Valley Projects: Proposed HOME projects with estimated amounts for 2012-2013 are outlined below:
Residential Rehabilitation Loan Program (RLRP) \$149,839
Community Housing Development Organization (CHDO) \$ 29,988
Program Administration \$ 35,669
Total \$215,476
Proposed Victorville Projects: Proposed HOME projects with estimated amounts for 2012-2013 are outlined below:
Owner Occupied Rehabilitation \$100,000
Mortgage Assistance Program (MAP) \$ 35,252
Senior Housing Repair Program (SHRP) \$ 47,070
Community Housing Development Organization (CHDO) \$100,000
Program Administration \$ 15,690
Total \$298,112

Document Availability: At this time, the Town has developed a draft 2012-2016 Five-Year Consolidated Plan and a draft First-Year Action Plan for fiscal year 2012-2013. These documents will be available for public review and comment from April 6, 2012 through May 8, 2012 at the following locations:
Apple Valley Library: 14901 Dale Evans Parkway
Apple Valley Development Services Building: 14955 Dale Evans Parkway
Town of Apple Valley Town Clerk's Office: 14955 Dale Evans Parkway
Website: www.applevalley.org

CITIZEN PARTICIPATION PLAN
The Town of Apple Valley is required to adopt a Citizen Participation Plan that sets forth policies and procedures for citizen participation with regard to

U.S. Department of Housing and Urban Development (HUD) grant-funding programs. The Town's Citizen Participation Plan has been adopted in conformance with the provisions of the Consolidated Submission Final Rule Section 91.105. Copies of the adopted Citizen Participation Plan are available for review at the same locations specified above for the Consolidated Plan.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)
The AI reviews and analyzes the following types of information and issues/concerns:
1. Analysis of the community profile to include demographic profile, income distribution, housing choices including, but not limited to housing brokerage services and financing assistance, public policies and actions affecting the construction of affordable housing, and administrative policies concerning community development and housing activities.
2. Evaluation of fair housing complaints and violations to identify trends and patterns.
3. Analysis of public and private activities that may impede fair housing choices including, but not limited to housing brokerage services and financing assistance, public policies and actions affecting the construction of affordable housing, and administrative policies concerning community development and housing activities.
4. Provision of conclusions and recommendations to further fair housing choice.

Public Hearing: The Town of Apple Valley encourages the participation by all residents in the process of developing the 2012-2016 Five-Year Consolidated Plan and Analysis of Impediments to Fair Housing Choice. Comments and input regarding needs and strategies to be addressed in the Five-Year Consolidated Plan or Analysis of Impediments to Fair Housing Choice may also be submitted in writing or by telephone.

The Town of Apple Valley and the City of Victorville will each hold a public hearing regarding the proposed uses of each community's respective CDBG and HOME allocations along with the draft Analysis of Impediments to Fair Housing Choice at the following locations:
May 8, 2012 at 6:30 p.m.
Town of Apple Valley
Town Council Chambers
14955 Dale Evans Parkway
Apple Valley, CA 92307
May 1, 2012 at 7:00 p.m.
City of Victorville
City Council Chambers
16433 Civic Drive
Victorville, CA 92392-2999

Comments regarding the draft 2012-2013 Five-Year Consolidated Plan and the draft First-Year Action Plan as well as the Analysis of Impediments to Fair Housing Choice as it pertains to Apple Valley for fiscal year 2012-2013 may be submitted in writing and sent to:
Town of Apple Valley
Community Development Department
14955 Dale Evans Parkway
Apple Valley, CA 92307

All written comments must be received by 5:00 P.M. on Tuesday, May 8, 2012.

In compliance with the Americans with Disabilities Act, if you require special assistance to participate in this meeting, please call Christopher Moore 48 hours prior to the meeting to ensure that the Town will be able to make reasonable arrangements.

Questions concerning this notice can be answered by contacting Christopher Moore at the Town of Apple Valley (760) 246-7600 extension 7921.
Published in the Apple Valley News April 6, 2012
A-341

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA, County of San Bernardino

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the publisher of the DAILY PRESS, a newspaper of general circulation, published in the City of Victorville, County of San Bernardino, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, under the date of November 21, 1938, Case number 43096, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

April 12

All in the year 2012.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated this: 12th day of April, 2012.


Signature
Leslie Jacobs

This space is the County Clerk's Filing Stamp

Proof of Publication of NOTICE OF PUBLIC HEARING

CITY OF VICTORVILLE
NOTICE OF PUBLIC
HEARING CONCERNING
THE PROPOSED
2012-2017 FIVE-YEAR
CONSOLIDATED PLAN
AND THE FIRST-YEAR
ACTION PLAN
AND
DRAFT ANALYSIS OF
IMPEDIMENTS TO FAIR
HOUSING CHOICE

YOU ARE INVITED - All interested citizens and agencies are invited to attend a public hearing on May 11, 2012, at 7:00 p.m. at the City of Victorville, 14343 Civic Drive, Victorville, CA 92392, to comment on the proposed 2012-2017 Consolidated Plan and First-Year Action Plan as well as the draft Analysis of Impediments to Fair Housing Choice (AI). The City is soliciting public comments from interested citizens, public agencies and other interested parties regarding the proposed Five-Year Consolidated Plan as well as the draft Analysis of Impediments to Fair Housing Choice. The City of Victorville formed a consortium with the Town of Apple Valley in order to meet the threshold of obtaining HOME Investment Partnerships Program (HOME) entitlement status with the U.S. Department of Housing and Urban Development (HUD). The successful formation of the consortium resulted in an annual allocation of HOME funds to both communities. This action requires the Consortium to prepare a joint Consolidated Plan that incorporates community needs assessments, strategies and action plans of both jurisdictions into one coherent plan. Both jurisdictions have also agreed to prepare a joint Analysis of Impediments to Fair Housing Choice. The Consortium has identified the Town of Apple Valley as the lead agency and the City of Victorville as a participating jurisdiction.

CONSOLIDATED PLAN SUMMARY - The Consolidated Plan is a comprehensive five-year strategy (2012-2017) that addresses the use of Federal grant/entitlement funds for the purpose of meeting the goals of providing decent housing, a suitable living environment, and expanded economic opportunities principally for low- and moderate-income persons.

The Consolidated Plan combines the application and reporting requirements for four Federal formula grant programs. It replaces the Comprehensive Housing Affordability Strategy (CHAS) and consolidates the applications for the Community Development Block Grant (CDBG), Home Investment Partnerships Act (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

The Consolidated Plan is composed of three parts: 1). The first section of the Consolidated Plan evaluates the Housing and Community Development needs of the Consortium. This includes an assessment of housing needs for extremely low, very low, and low- and moderate-income families, including the needs of homeless individuals and families. In addition, a housing market analysis

- Inland Empire United Way \$2,500
- Inland Fair Housing & Mediation Board \$14,000
- Legal Aid Society \$5,000
- Moses House Ministries \$2,500
- Sexual Assault Services \$5,000
- Victor Valley Domestic Violence \$17,500
- City of Victorville - Community Services Dept. - 6th Street After School Program \$20,000
- City of Victorville - Community Services Dept. - Brentwood After School Program \$20,000
- City of Victorville - Public Works Dept. - Graffiti Abatement \$12,811
- City of Victorville - Police Dept. - Crime-free Multi Housing \$5,000
- Victorville Senior Citizens Club - Handicapped Accessibility Improvements \$45,000
- Victorville Senior Citizens Club - Roof Repair \$25,000
- City of Victorville - Community Services - Village Park picnic shelter \$122,430
- City of Victorville - Development Dept. - Code Enforcement \$305,000
- City of Victorville - Demolition \$110,383
- City of Victorville - Program Administration \$185,588
- Total \$927,405

Benefits: At least 70 percent of the total funds received each year must be involved in activities that benefit low- and moderate-income persons. The City expects to spend 70 percent of its funds to benefit low- and moderate-income individuals during the 2012-2013 program year.

Past Use of Funds: Information on the current Fifth-Year Consolidated Plan and the City's past use of funds for the CDBG program may be reviewed at the City of Victorville Economic Development Department's office as well as on the City's website located at www.victorvillecity.com.

Displacement: No local public action is currently contemplated which would result in the displacement of low- and moderate-income households. If displacement occurs, the City will implement and fully comply with State and Federal relocation and acquisition statutes.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

HOME is authorized under Title II of the Cranston-Gonzales National Affordable Housing Act of 1990, as amended. HOME funds may be used to develop and support affordable rental housing and homeownership affordability through acquisition (including assistance to homeowners), new construction, reconstruction or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations to provide tenant-based rental assistance.

Document Availability: At this time, the City has developed a draft 2012-2017 Five-Year Consolidated Plan and a draft First-Year Action Plan for fiscal year 2012-2013. These documents will be available for public review and comment from April 9, 2012 through May 8, 2012 at the following locations:

- Victorville Library - 15011 Circle Drive
- City of Victorville City Clerk's Office: 14343 Civic Drive
- Website: www.victorvillecity.com

CITIZEN PARTICIPATION PLAN

The City of Victorville is required to adopt a Citizen Participation Plan that sets forth policies and procedures for citizen participation with regard to U.S. Department of Housing and Urban Development (HUD) grant/entitlement programs. The City's Citizen Participation Plan has been adopted in conformance with the provisions of the Consolidated Submission Final Rule Section 91.105. Copies of the adopted Citizen Participation Plan are available for review at the same locations specified above for the Consolidated Plan.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

The AI reviews and analyzes the following types of information and issues/concerns:

1. Analysis of the community profile to include demographic profile, income distribution, housing stock characteristics, and access to public transportation to determine the development of housing patterns in relation to race, ethnicity, income and other characteristics.
2. Evaluation of fair housing complaints and violations to identify trends and patterns.
3. Analysis of public and private activities that may impede fair housing choices including, but not limited to housing brokerage services and financing assistance, public policies and actions affecting the construction of affordable housing, and administrative policies concerning community development and housing activities.
4. Assessment of current fair housing programs and activities.
5. Provision of conclusions and recommendations to further fair housing choice.

Public Hearing: The City of Victorville encourages the participation by all residents in the process of developing the 2012-2017 Five-Year Consolidated Plan and Analysis of Impediments to Fair Housing Choice. Comments and input regarding needs and strategies to be addressed in the Five-Year Consolidated Plan or Analysis of Impediments to Fair Housing Choice may also be submitted in writing or by telephone.

The City of Victorville and the Town of Apple Valley will each hold a public hearing regarding the proposed uses of each community's respective CDBG and HOME allocations.

Appendix B: HMDA

The following HMDA tables were developed utilizing software from the [LendingPatterns.com](https://www.lendingpatterns.com) program:

Apple Valley FFIEC-Style Summary Spreadsheet - 2007

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Loan Purpose and Type																				
Purchase - Conventional	2,250	23.25	595,799	23.82	1,109	26.86	240,159	27.60	375	31.20	81,156	30.56	696	19.01	160,230	19.40	370	19.14	90,145	20.79
Purchase - Government	94	0.86	20,133	0.81	57	1.38	12,990	1.44	6	0.50	1,053	0.40	11	0.30	1,789	0.20	20	1.03	4,331	0.92
Home Improvement	1,298	11.00	103,947	7.36	418	10.12	56,991	6.34	114	9.51	13,991	5.27	500	15.04	82,416	9.54	106	9.62	30,549	6.47
Refinancing	6,980	63.91	1,700,989	68.02	2,545	61.64	581,018	64.62	704	58.72	169,320	63.77	2,374	64.85	611,583	70.78	1,357	70.20	339,968	71.82
Applicant Race																				
American Indian/Alaska Native	237	2.17	52,705	2.11	51	1.24	11,502	1.32	17	1.42	3,762	1.42	126	3.44	27,268	3.16	43	2.22	9,773	2.07
Asian	290	2.66	77,433	3.10	128	3.10	33,678	3.78	35	2.92	9,137	3.44	81	2.21	22,338	2.58	46	2.38	12,383	2.60
Black or African American	669	6.13	175,173	7.00	215	5.21	56,532	6.29	69	5.75	18,954	7.14	206	7.81	74,944	8.67	99	5.12	24,743	5.24
Hawaiian / Pacific Islander	73	0.67	20,741	0.83	22	0.53	5,291	0.59	12	1.00	4,285	1.61	28	0.76	7,522	0.87	11	0.57	3,643	0.77
White	6,956	63.69	1,533,880	61.33	2,887	69.92	600,534	67.68	792	66.06	168,600	63.50	2,234	61.02	514,179	59.50	1,043	53.96	242,567	51.30
2 or More Minority Races	26	0.24	5,727	0.23	5	0.12	1,305	0.15	2	0.17	378	0.14	14	0.38	3,028	0.35	5	0.26	1,016	0.22
Joint Race (White/Minority)	153	1.40	34,632	1.38	64	1.55	13,900	1.55	14	1.17	2,818	1.06	49	1.34	11,513	1.33	26	1.35	6,401	1.36
Race Not Available	2,518	23.05	600,576	24.01	757	18.33	168,016	18.69	258	21.52	67,586	21.69	843	23.03	203,307	23.53	660	34.14	171,667	36.36
Applicant Ethnicity																				
Hispanic or Latino	2,682	24.56	603,380	24.13	888	21.51	187,927	20.90	328	27.36	72,094	27.13	1,053	28.76	248,161	28.72	413	21.37	95,248	20.18
Not Hispanic or Latino	8,684	82.04	1,280,026	51.18	2,452	59.38	532,773	59.25	617	51.46	136,199	51.28	1,768	48.29	409,378	47.38	847	43.82	201,716	42.73
Joint (Hisp/Lat / Not Hisp/Lat)	285	2.61	69,169	2.77	126	3.05	28,408	3.16	25	2.09	5,789	2.18	90	2.46	22,317	2.58	44	2.28	12,655	2.68
Ethnicity Not Available	2,271	20.79	548,292	21.92	663	16.06	150,080	16.69	229	19.10	51,528	19.41	750	20.49	184,240	21.32	629	32.54	162,474	34.42
Minority Status																				
White Non-Hispanic	4,375	40.06	946,831	37.86	1,974	47.81	412,174	45.84	472	39.37	98,259	37.01	1,285	35.10	285,726	33.07	644	33.32	150,672	31.92
Others, Including Hispanic	4,153	38.02	979,113	39.15	1,439	34.85	325,797	36.23	484	40.37	113,092	42.59	1,592	43.49	387,428	44.84	638	33.01	152,796	32.37
Applicant Income																				
Low (0-49% of Median)	449	4.11	67,850	2.71	141	3.41	16,567	1.84	22	1.83	2,067	0.78	205	5.60	20,356	3.20	81	4.19	20,860	4.42
Moderate (50-79% of Median)	1,246	11.41	305,520	8.22	483	11.70	74,171	8.25	117	9.76	16,857	6.38	427	11.66	75,408	8.73	219	11.33	93,084	8.28
Middle (80-119% of Median)	2,815	25.77	566,585	22.66	1,058	25.62	201,800	22.44	293	24.44	54,641	20.58	966	26.39	202,036	23.39	490	25.76	100,050	22.89
Upper (>=120% of Median)	5,877	53.81	1,625,710	61.01	2,234	54.11	552,275	61.42	696	58.05	175,613	66.14	1,945	53.13	526,104	60.88	1,002	51.84	271,718	57.56
Income Not Available	535	4.90	135,202	5.41	213	5.16	54,337	6.04	71	5.92	16,342	6.15	118	3.22	32,142	3.72	133	6.88	32,381	6.86
Tract / BNA Characteristics																				
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Substantially Minority	10,922	100.00	2,500,867	100.00	4,129	100.00	899,158	100.00	1,199	100.00	265,520	100.00	3,661	100.00	864,096	100.00	1,933	100.00	472,093	100.00
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Moderate (50-79% of Median)	3,134	28.69	685,413	26.21	1,093	26.47	216,677	24.10	363	30.28	68,581	25.83	1,140	31.14	247,564	28.65	538	27.83	122,591	25.97
Middle (80-119% of Median)	6,224	57.08	1,429,527	57.16	2,292	57.99	520,383	57.87	651	54.30	149,760	56.40	2,076	56.71	489,024	56.59	1,115	57.68	270,360	57.27
Upper (>=120% of Median)	1,584	14.23	415,927	16.63	644	15.60	162,988	18.03	185	15.43	47,179	17.77	445	12.16	127,508	14.76	280	14.48	79,142	16.76
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mid and/or Sub Minority	3,134	28.69	685,413	26.21	1,093	26.47	216,677	24.10	363	30.28	68,581	25.83	1,140	31.14	247,564	28.65	538	27.83	122,591	25.97
All Other Census Tracts	7,788	71.31	1,845,454	73.79	3,036	73.53	682,481	75.90	836	69.72	196,939	74.17	2,521	68.86	616,532	71.35	1,395	72.17	349,502	74.03
Applicant Sex																				
Male	3,907	35.77	901,794	34.06	1,349	32.67	298,544	33.20	446	37.20	100,586	37.88	1,445	39.47	343,040	39.70	467	34.51	159,624	33.81
Female	2,463	22.55	550,425	22.01	919	22.26	195,480	21.74	285	23.77	64,194	24.18	944	23.05	197,322	22.94	415	21.47	93,439	19.79
Joint	3,607	33.03	820,879	32.82	1,599	38.73	348,526	38.76	366	30.53	79,865	29.78	1,073	29.31	252,242	29.20	569	29.44	140,946	29.86
Not Applicable	945	8.65	227,759	9.11	262	6.35	56,600	6.30	102	8.51	21,675	8.16	299	8.17	71,292	8.26	202	10.59	78,084	16.54
Total	10,922	100.00	2,500,867	100.00	4,129	100.00	899,158	100.00	1,199	100.00	265,520	100.00	3,661	100.00	864,096	100.00	1,933	100.00	472,093	100.00

Apple Valley FFIEC-Style Summary Spreadsheet - 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete				
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%	
Loan Purpose and Type																					
Purchase - Conventional	620	21.20	75,750	17.75	301	22.13	45,270	10.27	49	20.82	5,703	23.91	106	19.26	13,355	16.97	92	17.97	11,312	14.90	
Purchase - Government	929	31.48	132,739	31.10	656	38.10	95,103	38.30	40	23.53	5,243	22.07	92	16.82	13,441	17.07	141	27.54	18,932	24.93	
Home Improvement	74	2.51	4,563	1.07	24	1.39	2,201	0.92	2	1.10	155	0.65	30	6.95	1,419	1.80	10	1.95	700	0.93	
Refinancing	1,320	44.73	213,767	50.08	641	38.39	105,526	42.50	79	46.47	12,728	53.37	311	56.86	50,835	64.16	249	82.54	44,978	59.24	
Applicant Race																					
American Indian/Alaska Native	37	1.25	4,471	1.05	17	0.99	1,991	0.80	2	1.18	223	0.94	9	1.65	947	1.20	9	1.76	1,310	1.73	
Asian	107	3.63	18,131	4.25	56	3.25	9,556	3.85	7	4.12	1,026	4.30	30	5.49	5,269	6.69	14	2.73	2,201	3.00	
Black or African American	120	4.07	18,788	4.40	62	3.60	9,924	4.00	6	3.53	860	3.61	25	4.57	3,861	4.90	27	5.27	4,143	5.46	
Hawaiian / Pacific Islander	9	0.30	1,504	0.35	6	0.35	1,155	0.47	0	-	0	-	1	0.18	119	0.15	2	0.39	231	0.30	
White	2,195	74.38	309,676	72.55	1,359	78.92	191,140	76.99	126	74.12	16,689	69.88	372	68.01	53,191	67.54	338	66.02	48,656	64.08	
2 or More Minority Races	2	0.07	252	0.06	2	0.12	252	0.10	0	-	0	-	0	-	0	-	0	-	0	-	
Joint Race (White/Minority)	53	1.80	7,480	1.75	35	2.03	5,127	2.07	2	1.18	176	0.75	10	1.83	1,319	1.67	6	1.17	856	1.13	
Race Not Available	420	14.50	66,517	15.58	195	10.74	29,135	11.73	27	15.88	4,873	20.43	100	18.20	14,056	17.85	116	22.66	18,453	24.30	
Applicant Ethnicity																					
Hispanic or Latino	494	16.40	62,175	14.57	302	17.54	39,549	15.90	26	15.29	3,153	13.22	90	16.45	11,183	14.20	66	12.89	8,291	10.92	
Not Hispanic or Latino	1,970	66.76	287,017	67.25	1,195	69.40	173,696	69.96	111	65.29	15,171	63.61	348	63.25	51,187	64.99	318	62.11	46,963	61.85	
Joint (Hispanic / Not Hispanic)	95	3.22	14,044	3.40	50	3.37	6,424	3.39	7	4.12	940	3.90	17	3.11	2,960	3.76	13	2.54	2,512	3.31	
Ethnicity Not Available	402	13.62	62,783	14.71	167	9.70	26,612	10.72	26	15.29	4,577	19.19	94	17.18	13,430	17.05	115	22.46	18,164	23.92	
Minority Status																					
White Non-Hispanic	1,659	56.22	237,487	55.64	1,031	59.87	146,778	59.12	93	54.71	12,691	53.21	275	50.27	40,214	51.86	260	50.78	37,004	49.79	
Others, Including Hispanic	873	29.58	123,695	28.98	515	29.91	73,345	29.54	49	28.82	6,182	25.92	177	32.36	25,165	31.95	132	25.78	19,003	25.03	
Applicant Income																					
Low (0-49% of Median)	436	14.77	39,910	9.35	249	14.46	22,693	9.14	25	14.71	2,113	8.56	99	18.10	9,652	12.27	63	12.30	5,442	7.17	
Moderate (50-79% of Median)	647	21.92	76,569	17.94	382	22.18	45,498	18.33	44	25.88	4,728	19.62	115	21.02	13,786	17.50	106	20.70	12,957	16.94	
Middle (80-119% of Median)	616	20.87	88,126	20.65	364	21.14	52,576	21.18	43	25.29	6,051	25.37	122	22.30	17,936	22.77	87	16.99	11,563	15.23	
Upper (>=120% of Median)	925	31.25	166,599	39.02	557	32.35	96,901	39.04	37	21.76	7,270	30.48	159	29.07	29,295	37.20	172	33.59	33,102	43.60	
Income Not Available	327	11.08	55,616	13.03	170	9.87	30,582	12.32	21	12.35	3,687	15.46	52	9.51	8,081	10.26	84	16.41	13,266	17.47	
Tract/BNA Characteristics																					
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Not Substantially Minority	2,961	100.00	426,819	100.00	1,722	100.00	248,280	100.00	170	100.00	23,849	100.00	547	100.00	78,760	100.00	512	100.00	75,930	100.00	
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Moderate (50-79% of Median)	647	21.92	72,561	17.00	351	20.38	40,343	16.25	46	27.06	4,251	17.82	126	23.03	13,809	17.53	124	24.22	14,158	18.65	
Middle (80-119% of Median)	1,704	57.74	246,523	57.76	982	57.03	139,254	56.09	97	57.06	14,701	61.64	328	59.96	49,706	61.84	297	58.01	43,852	57.35	
Upper (>=120% of Median)	600	20.33	107,735	25.21	389	22.59	68,673	27.66	27	15.88	4,897	20.53	93	17.00	16,245	20.63	91	17.77	17,300	23.60	
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Low/Mid and/or Sub Minority	647	21.92	72,561	17.00	351	20.38	40,343	16.25	46	27.06	4,251	17.82	126	23.03	13,809	17.53	124	24.22	14,158	18.65	
All Other Census Tracts	2,304	78.00	354,258	83.00	1,371	79.62	207,937	83.75	124	72.94	19,590	82.10	421	76.97	64,951	82.47	388	75.78	61,772	81.35	
Applicant Sex																					
Male	961	32.57	125,182	31.67	532	30.89	75,048	30.23	58	34.12	7,876	32.02	191	34.92	27,517	34.94	180	35.16	24,741	32.58	
Female	582	19.72	72,289	16.94	361	20.96	46,124	18.58	25	14.71	3,198	13.41	113	20.66	13,218	16.78	83	16.21	9,749	12.84	
Joint	1,174	39.78	182,981	42.87	734	42.62	112,078	45.26	67	39.41	9,515	39.90	193	35.20	31,025	39.39	100	35.16	30,063	39.59	
Not Applicable	234	7.93	36,367	8.52	95	5.52	14,730	5.93	20	11.76	3,260	13.67	50	9.14	7,000	8.89	69	13.48	11,377	14.98	
Total	2,961	100.00	426,819	100.00	1,722	100.00	248,280	100.00	170	100.00	23,849	100.00	547	100.00	78,760	100.00	512	100.00	75,930	100.00	

Apple Valley FFIEC-Style Summary Spreadsheet – Asian Applicant Income 2007

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete					
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%		
Loan Purpose and Type																						
Purchase - Conventional	111	42.21	29,765	42.30	51	43.22	13,058	42.70	12	40.00	3,063	38.13	36	40.00	9,959	46.90	12	30.00	3,695	25.05		
Purchase - Government	2	0.76	496	0.70	2	1.69	496	1.62	0	-	0	-	0	-	0	-	0	-	0	-		
Home Improvement	16	6.00	2,441	3.47	3	2.54	536	1.75	2	6.67	550	6.95	0	10.67	1,237	5.83	3	7.50	110	1.05		
Refinancing	134	50.95	37,660	53.52	62	52.94	16,491	53.93	16	53.33	4,413	54.93	31	41.33	10,038	47.27	26	62.50	6,718	63.90		
Applicant Race																						
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	283	96.20	67,954	96.58	112	94.92	29,300	95.81	30	100.00	8,034	100.00	72	96.00	20,442	96.27	39	97.50	10,178	96.81		
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	10	3.00	2,400	3.42	6	5.00	1,201	4.19	0	-	0	-	3	4.00	792	3.73	1	2.50	335	3.19		
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																						
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	256	97.34	68,166	96.00	116	90.31	30,039	90.22	30	100.00	8,034	100.00	73	97.33	20,500	96.96	37	92.50	9,506	90.42		
Joint (Hispanic/Lat / Not Hispanic/Lat)	7	2.66	2,196	3.12	2	1.69	543	1.78	0	-	0	-	2	2.67	646	3.04	3	7.50	1,007	9.58		
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																						
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	263	100.00	70,362	100.00	118	100.00	30,581	100.00	30	100.00	8,034	100.00	75	100.00	21,234	100.00	40	100.00	10,513	100.00		
Applicant Income																						
Low (0-49% of Median)	3	1.14	78	0.11	0	-	0	-	1	3.33	56	0.70	2	2.67	22	0.10	0	-	0	-	0	-
Moderate (50-79% of Median)	14	5.32	2,839	4.03	9	7.63	1,383	4.52	1	3.33	100	1.24	2	2.67	835	3.93	2	5.00	521	4.96		
Middle (80-119% of Median)	24	9.13	5,183	7.37	14	11.86	2,922	9.55	3	10.00	633	7.88	3	4.00	824	3.88	4	10.00	804	7.65		
Upper (>=120% of Median)	213	80.99	59,722	84.88	91	77.12	25,458	83.24	25	83.33	7,245	90.18	63	84.00	17,834	83.99	34	85.00	9,188	87.40		
Income Not Available	9	3.42	2,540	3.61	4	3.39	821	2.68	0	-	0	-	5	6.67	1,719	8.10	0	-	0	-		
Tract/BNA Characteristics																						
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Substantially Minority	263	100.00	70,362	100.00	118	100.00	30,581	100.00	30	100.00	8,034	100.00	75	100.00	21,234	100.00	40	100.00	10,513	100.00		
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Moderate (50-79% of Median)	78	29.66	18,529	26.33	32	27.12	6,747	22.06	7	23.33	1,529	19.03	31	41.33	8,209	39.04	8	20.00	1,964	18.68		
Middle (80-119% of Median)	143	54.37	40,352	57.35	70	59.32	19,249	62.94	15	50.00	4,524	56.31	35	46.67	10,199	48.03	23	57.50	6,380	60.69		
Upper (>=120% of Median)	42	15.97	11,481	16.32	16	13.56	4,585	14.99	8	26.67	1,981	24.66	9	12.00	2,746	12.93	9	22.50	2,169	20.63		
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Moderate and/or Sub Minority	78	29.66	18,529	26.33	32	27.12	6,747	22.06	7	23.33	1,529	19.03	31	41.33	8,209	39.04	8	20.00	1,964	18.68		
All Other Census Tracts	185	70.34	51,833	73.67	86	72.88	23,834	77.94	23	76.67	6,505	80.97	44	58.67	12,945	60.96	32	80.00	8,549	81.32		
Applicant Sex																						
Male	93	35.36	27,920	39.68	39	33.05	11,938	39.04	11	36.67	3,307	42.16	31	41.33	9,191	43.28	12	30.00	3,404	32.38		
Female	104	39.54	24,562	34.91	54	46.76	12,724	41.61	12	40.00	2,823	36.38	25	33.33	6,429	30.28	13	32.50	2,486	23.68		
Joint	66	25.10	17,880	25.41	25	21.19	5,919	19.36	7	23.33	1,724	21.46	19	25.33	5,614	26.44	15	37.50	4,623	43.97		
Not Applicable	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Total	263	100.00	70,362	100.00	118	100.00	30,581	100.00	30	100.00	8,034	100.00	75	100.00	21,234	100.00	40	100.00	10,513	100.00		

Apple Valley FFIEC-Style Summary Spreadsheet - Black or African American Applicant Income 2007

Loan Purpose and Type	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Purchase - Conventional	180	27.82	44,388	26.48	69	32.86	17,154	31.38	28	40.00	6,688	36.80	64	23.70	16,490	23.59	19	19.59	3,976	16.53
Purchase - Government	4	0.62	1,058	0.63	2	0.95	586	1.07	0	-	0	-	0	-	0	-	2	2.06	472	1.96
Home Improvement	78	12.06	16,406	9.81	18	8.57	3,813	6.98	5	7.14	717	3.84	46	16.67	9,343	13.36	10	10.31	2,533	10.53
Refinancing	385	59.51	105,536	63.08	121	57.62	33,113	60.57	37	52.86	11,274	60.36	161	59.63	44,075	63.05	66	68.04	17,073	70.86
Applicant Race																				
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	626	96.75	162,076	96.87	200	95.24	52,088	95.28	66	94.29	17,834	95.48	265	98.15	68,622	98.16	95	97.94	23,532	97.83
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	21	3.25	5,231	3.13	10	4.76	2,578	4.72	4	5.71	845	4.52	5	1.85	1,286	1.84	2	2.06	522	2.17
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																				
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	638	96.61	164,089	96.55	204	97.14	53,216	97.25	70	100.00	18,679	100.00	268	99.26	69,296	99.12	96	98.97	23,669	98.48
Joint (Hispanic / Not Hispanic)	9	1.39	2,427	1.45	6	2.86	1,450	2.65	0	-	0	-	2	0.74	612	0.88	1	1.03	365	1.52
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	647	100.00	167,307	100.00	210	100.00	54,666	100.00	70	100.00	18,679	100.00	270	100.00	69,908	100.00	97	100.00	24,054	100.00
Applicant Income																				
Low (0-49% of Median)	24	3.71	2,627	1.57	9	4.29	1,876	1.97	0	-	0	-	12	4.44	1,355	1.94	3	3.09	196	0.81
Moderate (50-79% of Median)	62	9.58	10,624	6.39	18	8.57	2,485	4.58	7	10.00	1,172	6.27	29	10.74	5,333	7.63	8	8.25	1,634	6.79
Middle (80-119% of Median)	165	25.50	35,215	21.05	44	20.95	9,650	17.65	22	31.43	4,507	21.45	77	28.52	17,220	24.63	22	22.60	4,338	18.03
Upper (>=120% of Median)	367	56.72	111,148	66.43	130	61.80	38,718	70.83	40	57.14	13,325	71.29	146	54.07	44,066	63.03	51	52.58	15,029	62.48
Income Not Available	29	4.48	7,693	4.60	9	4.29	2,737	5.01	1	1.43	165	0.88	6	2.22	1,034	2.77	13	13.40	2,857	11.88
Tract/BNA Characteristics																				
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Substantially Minority	647	100.00	167,307	100.00	210	100.00	54,666	100.00	70	100.00	18,679	100.00	270	100.00	69,908	100.00	97	100.00	24,054	100.00
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Moderate (50-79% of Median)	188	29.06	45,942	27.46	55	26.19	13,377	24.47	24	34.29	6,580	35.23	79	29.26	18,527	26.50	30	30.93	7,458	31.01
Middle (80-119% of Median)	349	53.94	88,053	52.63	107	50.95	26,607	48.67	35	50.00	9,119	48.82	157	58.15	39,870	57.03	50	51.55	12,457	51.79
Upper (>=120% of Median)	110	17.00	33,312	19.91	48	22.86	14,682	26.86	11	15.71	2,980	15.95	34	12.59	11,511	16.47	17	17.83	4,139	17.21
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mid and/or Sub-Minority	188	29.06	45,942	27.46	55	26.19	13,377	24.47	24	34.29	6,580	35.23	79	29.26	18,527	26.50	30	30.93	7,458	31.01
All Other Census Tracts	459	70.94	121,365	72.54	155	73.81	41,289	75.53	46	65.71	12,099	64.72	191	70.74	51,381	73.50	67	69.07	16,596	68.99
Applicant Sex																				
Male	243	37.56	59,647	35.65	79	37.62	19,295	35.30	20	28.57	5,371	28.75	104	38.52	25,853	36.98	40	41.24	9,128	37.95
Female	233	36.01	60,176	36.97	65	30.95	17,695	32.30	27	38.57	6,483	34.71	106	39.26	27,042	38.68	35	36.08	8,996	37.40
Joint	171	26.43	47,484	28.38	66	31.43	17,716	32.41	23	32.86	6,825	36.54	60	22.22	17,013	24.34	22	22.68	5,930	24.65
Not Applicable	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Total	647	100.00	167,307	100.00	210	100.00	54,666	100.00	70	100.00	18,679	100.00	270	100.00	69,908	100.00	97	100.00	24,054	100.00

Apple Valley FFIEC-Style Summary Spreadsheet – Hispanic Applicant Income 2007

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete				
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%	
Loan Purpose and Type																					
Purchase - Conventional	950	33.77	214,645	33.72	382	40.25	83,592	41.35	133	38.78	26,913	35.85	301	27.54	73,211	28.29	194	31.31	30,929	30.79	
Purchase - Government	10	0.36	1,840	0.29	5	0.53	811	0.40	1	0.29	175	0.23	1	0.09	177	0.07	3	0.70	605	0.66	
Home Improvement	301	10.70	42,907	6.74	76	8.01	9,928	4.91	29	8.45	4,489	5.98	167	15.28	23,192	8.96	29	6.78	5,298	5.27	
Refinancing	1,552	55.17	377,076	59.24	406	51.21	107,821	52.34	180	52.40	43,499	57.93	624	57.09	162,231	62.60	252	61.21	63,535	63.25	
Applicant Race																					
American Indian/Alaska Native	179	6.36	39,093	6.14	34	3.58	7,018	3.47	14	4.08	2,981	3.97	98	8.97	21,042	8.13	33	7.71	8,052	8.02	
Asian	14	0.50	3,121	0.49	6	0.63	1,332	0.66	1	0.29	280	0.37	3	0.27	466	0.18	4	0.93	1,043	1.04	
Black or African American	8	0.28	2,694	0.42	1	0.11	306	0.15	0	-	0	-	6	0.55	1,620	0.74	1	0.23	460	0.46	
Hawaiian / Pacific Islander	8	0.64	4,432	0.70	5	0.53	1,076	0.53	2	0.58	734	0.98	9	0.82	1,779	0.69	2	0.47	843	0.84	
White	2,294	81.55	529,141	82.19	806	84.92	173,494	85.82	288	83.97	62,997	83.92	860	78.68	200,323	80.49	340	79.44	70,327	77.99	
2 or More Minority Races	3	0.11	635	0.10	2	0.21	595	0.29	0	-	0	-	1	0.09	40	0.02	0	-	0	-	
Joint Race (White/Minority)	21	0.75	5,277	0.83	8	0.84	1,793	0.89	0	-	0	-	10	0.91	2,504	0.97	3	0.70	980	0.98	
Race Not Available	276	9.61	58,083	9.13	87	9.17	16,548	8.19	38	11.08	8,074	10.76	106	9.70	22,729	8.78	45	10.51	10,732	10.68	
Applicant Ethnicity																					
Hispanic or Latino	2,482	95.34	603,380	94.80	888	93.57	187,927	92.96	328	95.63	72,044	95.97	1,053	96.34	248,161	98.09	413	96.50	95,248	94.82	
Not Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Joint (Hisp/Lat / Not Hisp/Lat)	131	4.66	33,096	5.20	61	6.43	14,225	7.04	15	4.37	3,022	4.03	40	3.66	10,680	4.11	15	3.50	5,199	5.18	
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Minority Status																					
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Others, Including Hispanic	2,813	100.00	636,476	100.00	949	100.00	202,152	100.00	343	100.00	75,066	100.00	1,093	100.00	258,811	100.00	428	100.00	100,447	100.00	
Applicant Income																					
Low (0-49% of Median)	94	3.34	12,949	2.03	31	3.27	3,496	1.73	5	1.46	321	0.43	49	3.66	6,258	2.42	18	4.21	2,873	2.86	
Moderate (50-79% of Median)	264	9.38	45,574	7.16	89	9.38	14,285	7.07	26	7.58	3,877	5.16	109	9.97	20,067	7.75	40	9.35	7,345	7.31	
Middle (80-119% of Median)	740	26.31	147,755	22.31	253	26.64	47,227	23.61	89	25.95	16,984	22.63	286	26.17	59,801	23.11	112	26.17	23,243	23.14	
Upper (>=120% of Median)	1,853	66.21	388,694	61.07	512	53.95	120,710	59.71	202	58.89	48,806	65.02	610	55.81	159,453	61.61	229	53.50	59,725	59.46	
Income Not Available	162	5.76	41,508	6.52	64	6.74	15,934	7.88	21	6.12	5,078	6.76	48	4.39	13,225	5.11	29	6.78	7,261	7.23	
Tract/BNA Characteristics																					
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Not Substantially Minority	2,813	100.00	636,476	100.00	949	100.00	202,152	100.00	343	100.00	75,066	100.00	1,093	100.00	258,811	100.00	428	100.00	100,447	100.00	
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Moderate (50-79% of Median)	974	34.62	209,942	32.99	303	31.93	62,764	31.05	119	34.69	22,803	30.38	406	37.15	91,205	35.24	146	34.11	33,170	33.02	
Middle (80-119% of Median)	1,522	54.11	341,371	53.63	526	55.43	108,601	53.72	190	55.39	43,431	57.86	571	52.24	134,325	51.90	235	54.91	55,014	54.77	
Upper (>=120% of Median)	317	11.27	85,163	13.30	120	12.64	30,787	15.23	34	9.91	8,832	11.77	116	10.61	33,281	12.86	47	10.90	12,263	12.21	
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0
Low/Med and/or Sub Minority	974	34.62	209,942	32.99	303	31.93	62,764	31.05	119	34.69	22,803	30.38	406	37.15	91,205	35.24	146	34.11	33,170	33.02	
All Other Census Tracts	1,839	65.38	426,534	67.01	646	68.07	139,388	68.95	224	65.31	52,263	69.62	687	62.85	167,606	64.76	282	65.89	67,277	66.88	
Applicant Sex																					
Male	1,396	49.63	322,832	50.72	437	46.05	96,128	47.55	174	50.73	39,226	52.26	581	53.16	139,498	53.90	204	47.66	47,680	47.77	
Female	659	23.43	151,530	23.81	222	23.39	48,772	24.13	92	26.82	20,999	27.97	234	21.41	55,969	21.60	111	25.93	25,850	25.73	
Joint	744	26.45	159,295	25.03	287	30.24	56,843	28.12	74	21.57	14,136	18.83	273	24.98	62,178	24.02	110	25.70	26,138	26.02	
Not Applicable	14	0.50	2,819	0.44	3	0.32	409	0.20	3	0.87	705	0.94	5	0.46	1,226	0.47	3	0.70	479	0.48	
Total	2,813	100.00	636,476	100.00	949	100.00	202,152	100.00	343	100.00	75,066	100.00	1,093	100.00	258,811	100.00	428	100.00	100,447	100.00	

Apple Valley FFIEC-Style Summary Spreadsheet - White Applicant Income 2007

Loan Purpose and Type	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Purchase - Conventional	913	19.99	196,670	19.63	472	22.89	100,743	23.42	141	28.83	28,368	27.88	189	14.02	40,819	13.99	113	16.67	26,940	16.70
Purchase - Government	61	1.33	12,644	1.27	36	1.75	8,038	1.87	5	1.02	878	0.86	6	0.59	1,173	0.39	12	1.77	2,555	1.61
Home Improvement	649	14.10	87,065	8.70	237	11.49	29,299	6.82	55	11.25	6,294	6.14	266	19.73	36,526	12.17	91	13.42	14,997	9.37
Refinancing	2,952	64.50	695,623	70.12	1,317	63.87	292,114	67.90	288	58.90	66,830	65.16	885	65.65	221,758	73.85	462	68.14	114,921	72.32
Applicant Race																				
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	4,498	98.27	975,533	98.34	2,030	98.45	424,321	98.63	481	98.36	100,946	98.42	1,324	98.22	294,748	98.16	663	97.79	155,518	97.86
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	79	1.73	16,469	1.66	32	1.55	5,913	1.37	8	1.64	1,624	1.58	24	1.78	5,537	1.84	15	2.21	3,395	2.14
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																				
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	4,446	97.14	961,775	96.95	2,005	97.24	418,044	97.17	479	97.96	99,803	97.30	1,205	96.81	290,300	96.67	657	96.90	153,628	96.67
Joint (Hispanic / Not Hispanic)	131	2.86	30,227	3.05	57	2.76	12,190	2.83	10	2.04	2,767	2.70	43	3.19	9,965	3.33	21	3.10	5,285	3.33
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	4,375	95.59	946,831	95.45	1,974	95.73	412,174	95.80	472	96.52	98,259	95.80	1,205	95.33	285,726	95.15	644	94.99	150,672	94.81
Others, Including Hispanic	202	4.41	45,171	4.55	88	4.27	18,060	4.20	17	3.48	4,311	4.20	63	4.67	14,559	4.85	34	5.01	8,241	5.19
Applicant Income																				
Low (<49% of Median)	194	4.24	23,587	2.38	71	3.44	8,154	1.90	10	2.04	1,137	1.11	87	6.45	11,134	3.71	26	3.83	3,162	1.99
Moderate (50-79% of Median)	981	12.69	90,483	9.12	281	12.66	29,731	9.23	81	12.47	8,761	8.54	178	13.20	28,586	9.52	81	11.99	13,405	8.44
Middle (80-119% of Median)	1,205	26.33	230,930	23.28	595	26.92	102,553	23.84	118	24.13	21,106	20.58	365	27.08	71,411	23.78	167	24.63	35,860	22.57
Upper (>=120% of Median)	2,401	52.46	599,183	60.40	1,086	52.67	258,445	60.07	277	56.05	66,200	64.55	680	50.45	179,949	59.59	258	37.60	95,582	60.15
Income Not Available	196	4.28	47,819	4.82	89	4.32	21,351	4.96	23	4.70	5,358	5.22	38	2.82	10,206	3.40	46	6.78	10,904	6.86
Tract/BNA Characteristics																				
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Substantially Minority	4,577	100.00	992,002	100.00	2,062	100.00	430,234	100.00	489	100.00	102,570	100.00	1,348	100.00	300,285	100.00	678	100.00	158,913	100.00
Low (<49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Moderate (50-79% of Median)	1,142	24.95	219,249	22.10	492	23.86	91,176	21.19	134	27.40	23,026	22.45	367	27.23	70,901	23.61	149	21.98	34,146	21.49
Middle (80-119% of Median)	2,753	60.15	605,866	60.99	1,248	60.52	263,733	61.30	265	54.19	59,036	57.56	812	60.24	185,517	61.78	428	63.13	96,780	60.90
Upper (>=120% of Median)	682	14.90	167,687	16.90	322	15.62	75,325	17.51	90	18.40	20,508	19.99	169	12.54	43,667	14.61	101	14.90	27,987	17.61
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Moderate and/or Sub Minority	1,142	24.95	219,249	22.10	492	23.86	91,176	21.19	134	27.40	23,026	22.45	367	27.23	70,901	23.61	149	21.98	34,146	21.49
All Other Census Tracts	3,435	75.05	772,753	77.90	1,570	76.14	339,058	78.81	355	72.60	79,544	77.55	981	72.77	229,284	76.39	529	78.02	124,767	78.51
Applicant Sex																				
Male	1,807	32.93	329,222	33.19	604	29.29	128,332	29.38	169	34.56	38,609	38.69	481	35.68	108,958	35.29	253	37.32	60,323	37.96
Female	1,020	22.29	212,940	21.37	446	21.63	88,985	20.68	103	21.06	20,949	19.55	320	23.74	70,301	23.41	151	22.27	32,705	20.58
Joint	2,024	44.44	447,820	45.06	1,006	48.74	212,298	49.60	215	43.97	45,882	44.24	542	40.20	122,166	41.02	271	39.97	65,074	40.95
Not Applicable	16	0.35	3,720	0.37	7	0.34	1,519	0.35	2	0.41	530	0.52	4	0.30	860	0.29	3	0.44	811	0.51
Total	4,577	100.00	992,002	100.00	2,062	100.00	430,234	100.00	489	100.00	102,570	100.00	1,348	100.00	300,285	100.00	678	100.00	158,913	100.00

Apple Valley FFIEC-Style Summary Spreadsheet - Asian Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete				
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%	
Loan Purpose and Type																					
Purchase - Conventional	57	51.82	7,951	43.73	32	55.17	4,550	47.17	2	33.33	321	43.09	12	37.50	1,562	27.72	11	70.57	1,510	70.41	
Purchase - Government	10	9.09	2,019	11.11	3	5.17	818	8.48	1	16.67	56	7.52	4	12.50	983	16.92	2	14.29	192	8.91	
Home Improvement	2	1.82	240	1.32	2	3.45	240	2.49	0	-	0	-	0	-	0	-	0	-	0	-	
Refinancing	41	37.27	7,970	43.84	21	36.21	4,037	41.86	3	50.00	368	49.40	16	50.00	3,119	55.36	1	7.14	446	20.69	
Applicant Race																					
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Asian	101	91.82	17,081	93.96	53	91.38	9,107	94.42	5	83.33	619	83.09	30	93.75	5,268	93.50	13	92.86	2,087	96.80	
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Joint Race (White/Minority)	9	8.18	1,099	6.05	5	8.62	530	5.50	1	16.67	126	16.91	2	6.25	366	6.50	1	7.14	69	3.20	
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Applicant Ethnicity																					
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Not Hispanic or Latino	100	90.10	10,100	99.60	56	96.55	9,573	99.25	6	100.00	745	100.00	32	100.00	5,634	100.00	14	100.00	2,156	100.00	
Joint (Hisp/Lat / Not Hisp/Lat)	2	1.82	72	0.40	2	3.45	72	0.75	0	-	0	-	0	-	0	-	0	-	0	-	
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Minority Status																					
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Others, Including Hispanic	110	100.00	18,180	100.00	58	100.00	9,645	100.00	6	100.00	745	100.00	32	100.00	5,634	100.00	14	100.00	2,156	100.00	
Applicant Income																					
Low (0-49% of Median)	6	5.45	603	3.32	0	-	0	-	0	-	0	-	4	12.50	480	8.52	2	14.29	123	5.71	
Moderate (50-79% of Median)	25	22.73	3,219	17.71	15	25.86	1,803	18.69	2	33.33	227	30.47	7	21.88	1,066	18.92	1	7.14	123	5.71	
Middle (80-119% of Median)	19	17.27	2,911	16.01	6	10.34	962	9.97	2	33.33	240	32.21	8	25.00	1,407	24.97	3	21.43	302	14.01	
Upper (>=120% of Median)	38	34.55	10,796	59.38	33	56.90	6,297	65.29	2	33.33	278	37.32	12	37.50	2,612	46.38	8	57.14	1,608	74.58	
Income Not Available	5	4.55	652	3.59	4	6.90	583	6.04	0	-	0	-	1	3.13	69	1.22	0	-	0	-	
Tract / BNA Characteristics																					
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Not Substantially Minority	110	100.00	18,180	100.00	58	100.00	9,645	100.00	6	100.00	745	100.00	32	100.00	5,634	100.00	14	100.00	2,156	100.00	
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Moderate (50-79% of Median)	27	24.55	3,194	17.57	14	24.14	1,486	15.41	1	16.67	137	18.39	5	15.63	614	10.90	7	50.00	957	44.39	
Middle (80-119% of Median)	57	51.82	9,333	51.34	28	48.28	4,982	51.65	4	66.67	507	68.05	20	62.50	3,221	57.17	5	35.71	623	28.90	
Upper (>=120% of Median)	26	23.64	5,653	31.09	16	27.59	3,177	32.94	1	16.67	101	13.56	7	21.88	1,799	31.99	2	14.29	576	26.72	
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Low/Med and/or Sub Minority	27	24.55	3,194	17.57	14	24.14	1,486	15.41	1	16.67	137	18.39	5	15.63	614	10.90	7	50.00	957	44.39	
All Other Census Tracts	83	75.45	14,986	82.43	44	75.86	8,159	84.59	5	83.33	608	81.61	27	84.38	5,020	89.10	7	50.00	1,199	55.61	
Applicant Sex																					
Male	37	33.64	6,677	36.73	20	34.48	3,637	37.71	2	33.33	157	21.07	12	37.50	2,511	44.57	3	21.43	372	17.25	
Female	27	24.55	4,342	23.88	14	24.14	2,237	23.19	1	16.67	184	24.70	10	31.25	1,664	29.83	2	14.29	287	13.82	
Joint	46	41.82	7,161	39.39	24	41.38	3,771	39.10	3	50.00	404	54.23	10	31.25	1,459	25.90	9	64.29	1,527	70.83	
Not Applicable	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Total	110	100.00	18,180	100.00	58	100.00	9,645	100.00	6	100.00	745	100.00	32	100.00	5,634	100.00	14	100.00	2,156	100.00	

Apple Valley FFIEC-Style Summary Spreadsheet - Black or African American Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete					
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%		
Loan Purpose and Type																						
Purchase - Conventional	22	18.18	2,883	15.13	11	17.46	1,205	12.00	2	33.33	129	18.27	5	21.74	1,121	29.33	4	13.79	428	9.54		
Purchase - Government	50	41.32	7,988	41.92	33	52.38	5,914	58.91	0	-	0	-	5	21.74	730	19.10	12	41.30	1,344	29.95		
Home Improvement	6	4.96	192	1.01	2	3.17	10	0.10	0	-	0	-	3	13.04	178	4.66	1	3.45	4	0.09		
Refinancing	43	35.54	7,992	41.94	17	26.96	2,910	28.99	4	66.67	577	81.73	10	43.48	1,793	46.91	12	41.30	2,712	60.43		
Applicant Race																						
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	113	93.29	17,030	93.61	60	95.24	9,055	95.18	5	83.33	664	92.63	21	91.30	3,486	91.21	27	93.10	4,143	92.31		
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	8	6.61	1,217	6.39	3	4.76	484	4.82	1	16.67	52	7.37	2	8.70	336	8.79	2	6.90	345	7.69		
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																						
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	120	99.17	18,871	99.03	62	90.41	9,055	90.17	6	100.00	706	100.00	23	100.00	3,822	100.00	29	100.00	4,488	100.00		
Joint (Hisp/Lat / Not Hisp/Lat)	1	0.83	184	0.97	1	1.59	184	1.83	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																						
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	121	100.00	19,055	100.00	63	100.00	10,059	100.00	6	100.00	706	100.00	23	100.00	3,822	100.00	29	100.00	4,488	100.00		
Applicant Income																						
Low (0-49% of Median)	14	11.57	1,819	9.55	7	11.11	693	6.90	1	16.67	44	6.23	3	13.04	757	19.81	3	10.34	325	7.24		
Moderate (50-79% of Median)	23	19.01	3,506	18.40	13	20.63	1,829	19.22	0	-	0	-	2	8.70	359	9.39	8	27.59	1,218	27.14		
Middle (80-119% of Median)	24	19.83	3,675	19.29	17	26.96	2,626	26.14	2	33.33	201	28.47	5	21.74	848	22.19	0	-	0	-		
Upper (>=120% of Median)	36	29.75	6,247	32.78	18	28.57	3,583	35.69	1	16.67	52	7.37	10	43.48	1,793	46.45	7	24.14	1,219	27.16		
Income Not Available	24	19.83	3,008	15.90	8	12.70	1,208	12.03	2	33.33	409	57.93	3	13.04	465	12.17	11	37.93	1,726	38.46		
Tract/BSA Characteristics																						
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Substantially Minority	121	100.00	19,055	100.00	63	100.00	10,059	100.00	6	100.00	706	100.00	23	100.00	3,822	100.00	29	100.00	4,488	100.00		
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Moderate (50-79% of Median)	33	27.27	3,267	17.15	14	22.22	1,552	15.46	2	33.33	96	13.60	5	21.74	312	8.16	12	41.30	1,307	29.12		
Middle (80-119% of Median)	56	46.28	9,966	52.35	33	52.38	5,173	51.53	2	33.33	409	57.93	10	43.48	2,265	59.26	11	37.93	2,109	46.99		
Upper (>=120% of Median)	32	26.45	5,832	30.61	16	25.40	3,314	33.01	2	33.33	201	28.47	8	34.78	1,245	32.57	6	20.69	1,072	23.69		
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mod and/or Sub Minority	33	27.27	3,267	17.15	14	22.22	1,552	15.46	2	33.33	96	13.60	5	21.74	312	8.16	12	41.30	1,307	29.12		
All Other Census Tracts	88	72.73	15,788	82.85	49	77.78	8,487	84.54	4	66.67	610	86.40	18	78.26	3,510	91.84	17	58.62	3,181	70.88		
Applicant Sex																						
Male	50	41.32	7,633	40.06	21	33.33	3,546	35.32	2	33.33	201	28.47	12	52.17	1,716	44.90	15	51.72	2,170	48.35		
Female	30	24.40	4,776	25.06	23	36.51	2,960	29.49	1	16.67	44	6.23	6	26.09	739	19.34	8	27.59	1,033	23.02		
Joint	33	27.27	6,646	34.88	19	30.16	3,533	35.19	3	50.00	461	65.30	5	21.74	1,367	35.77	6	20.69	1,285	28.63		
Not Applicable	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Total	121	100.00	19,055	100.00	63	100.00	10,059	100.00	6	100.00	706	100.00	23	100.00	3,822	100.00	29	100.00	4,488	100.00		

Apple Valley FFIEC-Style Summary Spreadsheet – Hispanic Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete				
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%	
Loan Purpose and Type																					
Purchase - Conventional	116	21.97	12,264	17.00	63	19.21	6,890	15.90	6	19.35	463	12.60	35	36.46	3,740	30.62	12	16.44	1,101	12.53	
Purchase - Government	263	49.81	34,869	50.84	183	55.79	24,282	56.11	14	45.16	1,730	47.07	27	28.13	3,812	31.21	39	53.42	5,045	53.52	
Home Improvement	7	1.33	267	0.37	4	1.22	229	0.53	0	-	0	-	2	2.08	25	0.20	1	1.37	3	0.03	
Refinancing	142	26.89	21,202	30.91	70	21.78	11,896	27.46	11	35.40	1,462	40.33	32	33.32	4,636	37.96	21	28.77	3,199	33.92	
Applicant Race																					
American Indian/Alaska Native	21	3.98	2,421	3.53	12	3.66	1,337	3.09	0	-	0	-	5	5.21	880	4.50	4	5.48	534	5.66	
Asian	1	0.19	194	0.28	0	-	0	-	0	-	0	-	0	-	0	-	1	1.37	194	2.06	
Black or African American	2	0.38	319	0.47	1	0.30	113	0.26	1	3.23	206	5.61	0	-	0	-	0	-	0	-	
Hawaiian / Pacific Islander	4	0.76	588	0.86	2	0.61	335	0.77	0	-	0	-	1	1.04	118	0.97	1	1.37	135	1.43	
White	450	85.80	58,886	85.05	297	87.50	38,007	87.82	30	96.77	3,469	94.39	70	81.25	9,700	80.00	50	79.45	7,630	80.94	
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Joint Race (White/Minority)	4	0.76	513	0.75	4	1.22	513	1.19	0	-	0	-	0	-	0	-	0	-	0	-	
Race Not Available	43	8.14	5,671	8.27	22	6.71	2,972	6.87	0	-	0	-	12	12.50	1,765	14.45	9	12.23	924	9.91	
Applicant Ethnicity																					
Hispanic or Latino	494	91.67	62,175	90.64	302	92.07	39,548	91.30	26	83.87	3,153	85.80	90	93.75	11,103	91.57	66	90.41	8,291	87.95	
Not Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Joint (Hisp./Lat / Not Hisp./Lat)	44	8.33	6,417	9.36	26	7.93	3,729	8.62	5	16.13	522	14.20	6	6.25	1,000	8.43	7	9.59	1,136	12.05	
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Minority Status																					
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Others, Including Hispanic	528	100.00	68,592	100.00	328	100.00	43,277	100.00	31	100.00	3,675	100.00	96	100.00	12,213	100.00	73	100.00	9,427	100.00	
Applicant Income																					
Low (0-49% of Median)	123	23.30	11,498	16.76	82	25.00	7,580	17.52	8	25.81	980	26.67	24	25.00	2,126	17.41	9	12.33	812	8.61	
Moderate (50-79% of Median)	155	29.36	18,394	26.82	93	28.35	11,319	26.15	14	45.16	1,333	36.27	26	27.08	3,140	25.71	22	30.14	2,602	27.60	
Middle (80-119% of Median)	99	18.75	13,929	20.31	64	19.51	9,132	21.10	3	9.60	493	13.41	19	19.79	2,473	20.25	13	17.81	1,031	19.42	
Upper (>=120% of Median)	111	21.02	18,790	27.34	65	19.82	11,084	25.61	3	9.60	486	13.22	21	21.88	3,699	30.29	22	30.14	3,481	36.93	
Income Not Available	40	7.58	6,021	8.78	24	7.32	4,162	9.62	3	9.60	383	10.42	6	6.25	775	6.35	7	9.59	701	7.44	
Tract / BNA Characteristics																					
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Not Substantially Minority	528	100.00	68,592	100.00	328	100.00	43,277	100.00	31	100.00	3,675	100.00	96	100.00	12,213	100.00	73	100.00	9,427	100.00	
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Moderate (50-79% of Median)	159	30.11	17,435	25.42	95	28.96	10,249	23.68	14	45.16	1,428	38.86	27	28.13	3,173	25.98	23	31.51	2,585	27.42	
Middle (80-119% of Median)	292	55.30	38,282	55.81	179	54.57	23,955	55.25	13	41.94	1,555	42.31	57	59.38	7,090	58.05	43	58.90	5,602	60.27	
Upper (>=120% of Median)	77	14.58	12,875	18.77	54	16.46	9,073	20.96	4	12.90	692	18.83	12	12.50	1,980	15.97	7	9.59	1,160	12.31	
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Low/Mod and/or Sub Minority	159	30.11	17,435	25.42	95	28.96	10,249	23.68	14	45.16	1,428	38.86	27	28.13	3,173	25.98	23	31.51	2,585	27.42	
All Other Census Tracts	369	69.89	51,157	74.58	233	71.04	33,028	76.32	17	54.84	2,247	61.14	69	71.88	9,040	74.02	50	68.49	6,842	72.58	
Applicant Sex																					
Male	210	39.77	26,025	37.94	127	38.72	16,420	37.94	9	29.03	1,157	31.48	45	46.88	5,324	43.67	29	39.73	3,114	33.03	
Female	111	21.02	13,285	19.32	73	22.26	8,418	19.45	8	25.81	979	26.64	18	18.75	2,445	20.02	12	16.44	1,413	14.99	
Joint	205	38.83	29,148	42.49	126	38.41	18,275	42.23	14	45.16	1,539	41.88	33	34.38	4,434	36.31	32	43.84	4,900	51.98	
Not Applicable	2	0.38	164	0.24	2	0.61	164	0.38	0	-	0	-	0	-	0	-	0	-	0	-	
Total	528	100.00	68,592	100.00	328	100.00	43,277	100.00	31	100.00	3,675	100.00	96	100.00	12,213	100.00	73	100.00	9,427	100.00	

Apple Valley FFIEC-Style Summary Spreadsheet - White Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Loan Purpose and Type																				
Purchase - Conventional	342	19.28	40,675	16.33	224	20.82	26,028	17.44	30	31.58	3,622	27.61	42	14.53	5,496	12.95	46	17.10	4,729	11.94
Purchase - Government	528	30.54	76,099	30.56	397	36.90	57,689	37.50	21	22.11	2,899	22.09	42	14.53	5,801	13.06	68	25.20	9,630	24.30
Home Improvement	43	2.49	2,687	1.08	13	1.21	1,016	0.66	2	2.11	155	1.18	23	7.96	1,076	2.54	5	1.86	440	1.11
Refinancing	816	47.19	129,556	52.03	442	41.00	68,302	44.40	42	44.21	6,442	49.11	182	62.98	29,989	70.66	150	55.76	24,823	62.65
Applicant Race																				
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	1,705	98.61	245,375	98.94	1,058	98.33	150,924	98.11	95	100.00	13,117	100.00	288	98.96	42,144	99.30	266	98.88	39,180	98.88
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	24	1.39	3,641	1.46	10	1.67	2,901	1.89	0	-	0	-	3	1.04	298	0.70	3	1.12	442	1.12
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																				
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	1,682	97.28	240,977	96.77	1,048	97.40	149,528	97.20	93	97.89	12,691	96.75	278	96.19	40,512	95.45	263	97.77	38,246	96.53
Joint (Hisp/Lat / Not Hisp/Lat)	47	2.72	8,039	3.23	28	2.60	4,307	2.80	2	2.11	426	3.25	11	3.81	1,930	4.55	6	2.23	1,376	3.47
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	1,659	95.95	237,487	95.37	1,031	95.82	146,778	95.41	93	97.89	12,691	96.75	275	95.16	40,214	94.75	260	96.65	37,804	95.41
Others, Including Hispanic	70	4.05	11,529	4.63	46	4.18	7,857	4.59	2	2.11	426	3.25	14	4.84	2,220	5.25	9	3.25	1,818	4.59
Applicant Income																				
Low (0-49% of Median)	227	13.13	19,707	7.91	139	12.82	12,225	7.95	15	15.79	981	7.48	48	15.57	4,170	9.83	28	10.41	2,301	5.88
Moderate (50-79% of Median)	370	21.40	41,756	16.77	237	22.03	27,287	17.74	21	22.11	2,261	17.24	61	21.11	6,769	15.95	51	18.96	5,439	13.73
Middle (80-119% of Median)	381	22.04	55,189	22.16	235	21.94	34,238	22.26	26	27.37	3,844	29.31	67	23.18	10,249	24.18	53	19.70	6,858	17.31
Upper (>=120% of Median)	575	33.26	102,317	41.09	361	33.55	61,660	40.08	23	24.21	4,391	33.48	92	31.83	17,494	41.22	99	36.80	16,772	47.38
Income Not Available	176	10.18	30,047	12.07	104	9.67	18,425	11.98	10	10.53	1,460	12.50	24	8.30	3,760	8.86	38	14.13	6,222	15.70
Tract/BNA Characteristics																				
Substantially Minority	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Substantially Minority	1,729	100.00	249,016	100.00	1,076	100.00	153,835	100.00	95	100.00	13,117	100.00	289	100.00	42,442	100.00	269	100.00	39,622	100.00
Low (0-49% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Moderate (50-79% of Median)	352	20.36	40,054	16.08	205	19.05	23,875	15.52	26	27.37	2,205	16.81	61	21.11	7,085	16.69	60	22.30	6,889	17.39
Middle (80-119% of Median)	1,024	59.22	147,378	59.18	624	57.99	87,209	56.69	54	56.84	8,169	62.28	181	62.63	27,499	64.79	165	61.34	24,501	61.84
Upper (>=120% of Median)	353	20.42	61,584	24.73	247	22.96	42,751	27.79	15	15.79	2,743	20.91	47	16.26	7,858	18.51	44	16.36	8,232	20.78
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mid and/or Sub Minority	352	20.36	40,054	16.08	205	19.05	23,875	15.52	26	27.37	2,205	16.81	61	21.11	7,085	16.69	60	22.30	6,889	17.39
All Other Census Tracts	1,377	79.64	208,962	83.92	871	80.95	129,960	84.48	69	72.63	10,912	83.19	228	78.69	35,357	83.31	209	77.70	32,733	82.61
Applicant Sex																				
Male	500	34.01	82,001	32.93	337	31.32	47,246	30.71	39	41.05	5,050	38.56	103	35.64	14,740	34.73	109	40.52	14,957	37.75
Female	346	20.01	42,704	17.15	223	20.72	29,588	18.56	13	13.68	1,632	12.44	48	16.71	7,992	18.71	48	16.73	5,422	13.68
Joint	792	45.81	123,665	49.66	516	47.96	78,031	50.72	43	45.26	6,427	49.00	120	41.52	20,427	48.13	113	42.01	16,700	47.40
Not Applicable	3	0.17	646	0.26	0	-	0	-	0	-	0	-	1	0.35	183	0.43	2	0.74	463	1.17
Total	1,729	100.00	249,016	100.00	1,076	100.00	153,835	100.00	95	100.00	13,117	100.00	289	100.00	42,442	100.00	269	100.00	39,622	100.00

Victorville FFIEC-Style Summary Spreadsheet - 2007

Loan Purpose and Type	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Purchase - Conventional	7,814	32.34	1,719,481	32.10	3,548	38.87	760,448	39.56	1,094	38.40	225,282	39.65	2,034	25.01	470,802	25.18	1,178	28.33	262,969	26.78
Purchase - Government	345	1.43	87,372	1.63	205	2.25	53,086	2.76	20	0.73	4,555	0.78	56	0.69	15,242	0.82	64	1.54	14,899	1.48
Home Improvement	2,431	10.06	306,253	5.72	773	8.47	80,712	4.42	224	8.16	20,390	2.58	1,115	13.71	145,405	7.70	319	7.67	51,746	5.27
Refinancing	13,574	56.17	3,243,512	60.55	4,601	50.41	1,019,376	53.06	1,447	52.71	332,645	67.07	4,929	60.60	1,238,445	66.23	2,597	62.46	652,646	66.47
Applicant Race																				
American Indian/Alaska Native	660	2.76	133,159	2.49	151	1.65	27,061	1.41	30	1.30	0,756	1.50	365	4.49	74,100	3.97	114	2.74	23,162	2.36
Asian	1,115	4.61	269,662	5.03	493	4.96	107,231	5.58	161	5.87	35,208	6.04	308	3.79	78,420	4.19	193	4.64	48,803	4.97
Black or African American	2,130	8.85	505,295	9.43	695	7.61	156,033	8.16	230	8.30	52,910	9.00	674	10.75	211,305	11.30	339	8.15	84,167	8.57
Hawaiian / Pacific Islander	283	1.17	63,762	1.19	113	1.24	24,254	1.26	17	0.62	3,083	0.53	118	1.45	28,297	1.51	35	0.84	8,148	0.83
White	13,901	57.53	3,023,661	56.45	5,684	62.28	1,174,496	61.11	1,696	61.79	353,855	60.71	4,440	54.59	1,016,631	54.37	2,081	50.05	478,679	48.75
2 or More Minority Races	25	0.10	4,321	0.08	5	0.05	817	0.04	4	0.15	516	0.09	11	0.14	1,554	0.08	5	0.12	1,494	0.15
Joint Race (White/Minority)	327	1.35	70,575	1.32	122	1.34	24,499	1.27	19	0.69	4,152	0.71	136	1.67	30,187	1.61	50	1.20	11,737	1.20
Race Not Available	5,707	23.62	1,286,183	24.01	1,904	20.86	408,831	21.17	580	21.13	124,392	21.34	1,882	23.14	429,290	22.96	1,341	32.25	325,720	33.17
Applicant Ethnicity																				
Hispanic or Latino	8,709	36.37	1,896,799	35.39	2,271	25.84	674,279	35.00	1,124	40.95	236,120	40.51	3,094	37.91	694,334	37.12	1,310	31.51	291,257	29.66
Not Hispanic or Latino	10,042	41.56	2,240,839	41.83	4,086	44.77	869,140	45.32	1,088	39.64	233,806	40.11	3,290	40.45	763,095	40.81	1,578	37.95	374,858	38.18
Joint (Hisp/Lat / Not Hisp/Lat)	509	2.44	130,936	2.44	234	2.56	47,049	2.45	40	1.75	9,980	1.71	213	2.62	50,039	2.68	94	2.26	23,860	2.43
Ethnicity Not Available	8,744	19.63	1,089,054	20.33	1,536	16.83	331,555	17.25	495	17.67	102,938	17.66	1,547	19.02	362,666	19.40	1,176	28.28	291,875	29.73
Minority Status																				
White Non-Hispanic	6,151	25.46	1,327,815	24.78	2,671	29.26	549,897	28.80	646	23.53	134,085	23.00	1,899	23.35	426,280	22.80	938	22.49	217,483	22.15
Others, Including Hispanic	13,008	53.83	2,883,587	53.83	4,794	52.53	1,014,527	52.76	1,566	57.78	339,308	58.22	4,623	56.84	1,045,216	56.97	2,005	48.22	464,536	47.31
Applicant Income																				
Low (0-49% of Median)	666	2.94	92,716	1.73	180	2.06	22,575	1.17	49	1.79	5,687	0.98	339	4.17	46,219	2.47	110	2.65	18,235	1.86
Moderate (50-79% of Median)	2,460	10.18	426,633	7.96	886	9.71	140,853	7.33	206	7.50	31,882	5.47	950	11.68	178,743	9.56	418	10.05	75,155	7.65
Middle (80-119% of Median)	6,450	26.69	1,335,626	24.93	2,501	27.40	488,916	25.44	603	24.00	134,292	23.04	2,222	27.32	470,630	25.60	1,044	25.11	233,700	23.81
Upper (>=120% of Median)	13,438	55.61	3,231,986	60.34	5,110	55.99	1,162,234	60.47	1,683	60.22	376,983	64.68	4,346	53.43	1,102,547	58.96	2,329	56.01	590,222	60.11
Income Not Available	1,130	4.60	269,657	5.03	442	4.84	107,444	5.59	154	5.61	34,000	5.83	277	3.41	63,747	3.41	257	6.18	64,450	6.56
Tract/BNA Characteristics																				
Substantially Minority	14,289	59.13	3,044,864	57.32	5,222	57.21	1,049,087	54.58	1,602	58.36	330,520	56.71	4,992	61.37	1,115,134	59.64	2,473	59.48	570,133	58.07
Not Substantially Minority	9,875	40.87	2,291,754	42.76	3,505	42.79	872,935	45.42	1,143	41.64	252,332	43.29	3,142	38.63	754,770	40.36	1,695	40.52	411,717	41.93
Low (0-49% of Median)	379	1.57	67,747	1.26	131	1.44	21,896	1.13	47	1.71	8,828	1.51	144	1.77	25,948	1.39	57	1.37	11,275	1.15
Moderate (50-79% of Median)	12,756	52.79	2,726,383	50.90	4,690	51.47	949,001	49.30	1,454	52.97	301,247	51.70	4,416	54.29	962,203	52.53	2,100	52.62	493,732	50.29
Middle (80-119% of Median)	11,011	45.57	2,558,204	47.76	4,293	47.04	950,099	49.43	1,241	45.21	272,397	46.74	3,568	43.87	859,817	45.98	1,909	45.91	475,891	48.47
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	18	0.07	4,384	0.08	5	0.05	1,226	0.06	3	0.11	280	0.05	6	0.07	1,526	0.10	4	0.10	952	0.10
Low/Mod and/or Sub Minority	16,602	68.71	3,551,551	66.30	6,131	67.17	1,230,570	64.02	1,874	68.27	386,031	66.23	5,708	70.17	1,275,339	68.20	2,889	69.48	659,641	67.18
All Other Census Tracts	7,562	31.29	1,809,037	33.70	2,996	32.83	691,452	35.98	871	31.73	196,821	33.77	2,426	29.83	594,589	31.80	1,269	30.52	322,209	32.82
Applicant Sex																				
Male	9,047	37.44	2,009,961	37.52	3,330	36.49	699,973	36.42	1,116	40.66	241,117	41.37	3,066	37.68	710,810	38.01	1,536	36.94	388,061	36.47
Female	5,941	24.59	1,302,811	24.32	2,190	23.89	452,934	23.57	716	26.00	156,348	26.82	2,053	25.24	461,720	24.69	992	23.86	231,801	23.61
Joint	7,259	30.04	1,608,494	30.03	3,047	33.38	643,473	33.48	738	26.89	149,752	26.69	2,338	28.74	545,411	29.17	1,136	27.32	269,948	27.48
Not Applicable	1,917	7.93	435,362	8.13	570	6.25	125,642	6.54	175	6.30	35,635	6.11	670	8.34	151,945	8.13	494	11.80	122,140	12.44
Total	24,164	100.00	5,356,618	100.00	9,127	100.00	1,922,022	100.00	2,746	100.00	582,852	100.00	8,134	100.00	1,869,894	100.00	4,158	100.00	981,880	100.00

Victorville FFIEC-Style Summary Spreadsheet - 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Loan Purpose and Type																				
Purchase - Conventional	1,118	19.99	117,630	16.16	692	20.75	71,256	16.45	91	31.30	9,996	27.02	206	10.68	20,699	15.00	139	15.19	15,679	13.12
Purchase - Government	2,811	46.68	344,252	47.30	1,703	51.83	225,754	52.18	96	33.10	11,861	32.33	406	36.81	54,558	39.54	406	44.37	51,979	43.49
Home Improvement	162	2.90	14,994	2.06	58	1.77	11,636	2.55	4	1.30	294	0.79	75	6.80	2,699	1.96	25	2.73	965	0.81
Refinancing	1,703	30.44	250,924	34.48	843	25.65	125,243	28.91	99	34.14	14,742	39.85	416	37.72	60,037	43.51	345	37.70	50,902	42.59
Applicant Race																				
American Indian/Alaska Native	97	1.73	12,014	1.65	55	1.67	7,046	1.63	1	0.34	86	0.23	24	2.18	2,502	1.81	17	1.86	2,380	1.99
Asian	410	7.33	46,017	6.60	250	7.61	29,600	6.83	31	10.69	3,271	8.84	79	7.16	9,269	6.72	50	5.46	5,877	4.92
Black or African American	423	7.56	57,168	7.85	221	6.73	29,900	6.90	24	8.28	2,981	8.08	108	9.79	13,910	10.08	70	7.65	10,374	8.68
Hawaiian / Pacific Islander	30	0.54	3,974	0.55	22	0.67	2,919	0.67	0	-	0	-	5	0.45	578	0.42	3	0.33	477	0.40
White	3,765	67.30	483,903	66.49	2,290	69.93	297,201	68.59	194	66.90	24,895	67.30	689	62.47	86,409	62.62	584	63.03	75,398	63.00
2 or More Minority Races	8	0.14	916	0.13	6	0.18	808	0.19	0	-	0	-	2	0.18	108	0.08	0	-	0	-
Joint Race (White/Minority)	91	1.63	14,387	1.90	55	1.67	8,387	1.94	6	2.07	888	2.40	17	1.54	3,041	2.20	13	1.42	2,071	1.73
Race Not Available	770	13.76	107,424	14.76	379	11.53	57,428	13.25	34	11.72	4,872	13.17	179	16.23	22,176	16.07	178	19.45	22,948	19.20
Applicant Ethnicity																				
Hispanic or Latino	1,900	33.96	229,000	31.57	1,123	34.18	138,079	31.86	95	32.76	11,229	30.26	301	34.54	44,490	32.24	301	32.90	36,042	30.15
Not Hispanic or Latino	2,893	51.72	383,878	52.74	1,756	53.44	232,811	53.73	156	53.79	20,825	54.13	541	49.05	70,631	51.18	440	48.09	60,411	50.54
Joint (Hispanic / Not Hispanic/Lat)	174	3.11	24,067	3.31	112	3.41	14,793	3.41	8	2.76	1,639	4.43	29	2.63	4,149	3.01	25	2.73	3,486	2.92
Ethnicity Not Available	627	11.21	80,055	12.37	295	8.98	47,646	11.00	31	10.69	4,100	11.08	152	13.78	18,723	13.57	149	16.28	19,586	16.39
Minority Status																				
White Non-Hispanic	1,943	34.73	260,606	35.81	1,210	36.82	163,010	37.62	90	33.79	13,184	35.64	333	30.19	43,592	31.59	302	33.01	40,820	34.15
Others, Including Hispanic	3,008	53.77	374,408	51.44	1,769	53.83	220,872	50.98	161	55.52	19,609	53.01	614	55.67	74,964	54.32	464	50.71	58,963	49.33
Applicant Income																				
Low (0-49% of Median)	1,147	20.50	109,758	15.08	661	20.12	63,304	14.61	52	17.93	4,602	12.44	246	22.30	22,933	16.62	188	20.55	18,919	15.83
Moderate (50-79% of Median)	1,493	26.69	177,574	24.40	909	27.66	108,830	25.12	77	26.55	9,782	26.44	298	27.02	34,419	24.94	209	22.84	24,543	20.53
Middle (80-119% of Median)	1,129	20.18	151,803	20.86	684	20.82	93,158	21.50	58	20.00	7,584	20.50	225	20.40	29,876	21.65	162	17.70	21,185	17.72
Upper (>=120% of Median)	1,201	21.47	185,397	25.47	701	21.33	104,602	24.19	68	23.45	9,400	25.41	233	21.12	37,208	26.96	199	21.75	33,987	28.44
Income Not Available	624	11.15	103,288	14.19	331	10.07	63,198	14.58	35	12.07	5,625	15.21	101	9.16	13,557	9.82	157	17.16	20,891	17.46
Tract / BNA Characteristics																				
Substantially Minority	2,965	53.00	338,239	46.47	1,746	53.20	207,906	47.98	141	48.62	14,588	39.43	589	53.40	61,742	44.74	487	53.22	54,003	45.18
Not Substantially Minority	2,629	47.00	389,561	53.53	1,538	46.80	225,383	52.02	149	51.38	22,405	60.57	514	46.60	76,251	55.26	420	46.70	65,522	54.82
Low (0-49% of Median)	45	0.80	3,514	0.48	16	0.49	1,410	0.33	4	1.38	351	0.95	11	1.00	792	0.57	14	1.53	961	0.80
Moderate (50-79% of Median)	2,779	49.68	321,025	44.22	1,624	49.42	196,667	45.29	133	45.06	14,307	38.89	549	49.77	57,409	41.66	473	51.69	53,292	44.59
Middle (80-119% of Median)	2,770	49.52	402,451	55.30	1,646	50.09	235,212	54.29	153	52.76	22,255	60.16	543	49.23	79,712	57.77	428	46.78	68,272	54.61
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Med and/or Sub-Minority	3,458	61.82	397,168	54.57	2,050	62.39	244,138	56.35	168	62.03	18,048	48.79	672	60.92	70,829	51.33	568	62.08	64,173	53.69
All Other Census Tracts	2,136	38.18	330,612	45.43	1,236	37.61	189,151	43.65	122	42.97	18,945	51.21	431	39.08	67,164	48.67	347	37.92	55,252	46.31
Applicant Sex																				
Male	2,262	40.44	282,083	38.76	1,298	39.50	162,659	37.54	126	43.45	15,291	41.61	449	40.71	55,209	40.01	389	42.51	48,624	40.85
Female	1,349	24.12	157,336	21.42	822	25.02	98,216	22.67	72	24.83	8,392	22.69	261	23.66	28,100	20.36	194	21.20	22,628	18.93
Joint	1,632	29.17	233,435	32.07	1,009	30.71	142,897	32.98	74	25.52	10,899	29.46	299	27.11	42,950	31.12	250	27.32	36,689	30.70
Not Applicable	381	6.27	54,946	7.58	157	4.78	29,517	6.81	18	6.21	2,311	6.25	94	8.52	11,724	8.50	82	8.86	11,384	9.52
Total	5,994	100.00	727,800	100.00	3,296	100.00	433,289	100.00	290	100.00	35,993	100.00	1,103	100.00	137,993	100.00	915	100.00	119,525	100.00

Victorville FFIEC-Style Summary Spreadsheet – Asian Applicant Income 2007

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete				
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%	
Loan Purpose and Type																					
Purchase - Conventional	393	37.72	87,553	34.80	185	42.73	41,114	40.02	66	43.42	12,952	39.15	79	28.21	19,847	27.43	63	35.59	13,640	31.42	
Purchase - Government	9	0.06	2,594	1.03	6	1.39	1,721	1.68	1	0.66	307	0.93	0	-	0	-	2	1.13	556	1.28	
Home Improvement	72	6.91	12,475	4.96	25	5.77	4,424	4.31	7	4.61	1,105	3.34	29	10.36	5,203	7.19	11	6.21	1,743	4.02	
Refinancing	568	54.51	148,970	59.21	217	50.12	55,484	54.00	78	51.32	18,722	56.59	172	61.43	47,300	65.38	101	57.06	27,472	63.28	
Applicant Race																					
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Asian	1,020	97.89	246,378	97.93	423	97.69	100,848	98.16	151	99.34	32,886	99.40	274	97.86	70,543	97.50	172	97.18	42,101	96.98	
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Joint Race (White/Minority)	22	2.11	5,212	2.07	10	2.31	1,895	1.84	1	0.66	200	0.60	6	2.14	1,607	2.50	5	2.82	1,310	3.02	
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Applicant Ethnicity																					
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Not Hispanic or Latino	1,020	98.66	247,666	98.44	423	98.85	101,713	99.00	152	100.00	33,086	100.00	275	98.21	70,821	97.89	173	97.74	42,046	96.86	
Joint (Hisp/Lat / Not Hisp/Lat)	14	1.34	3,924	1.56	5	1.15	1,030	1.00	0	-	0	-	3	1.79	1,529	2.11	4	2.26	1,365	3.14	
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Minority Status																					
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Others, Including Hispanic	1,042	100.00	251,590	100.00	433	100.00	102,743	100.00	152	100.00	33,086	100.00	280	100.00	72,350	100.00	177	100.00	43,411	100.00	
Applicant Income																					
Low (0-49% of Median)	4	0.38	665	0.26	1	0.23	125	0.12	0	-	0	-	2	0.71	225	0.31	1	0.56	315	0.73	
Moderate (50-79% of Median)	46	4.41	9,765	3.88	16	3.70	3,116	3.03	6	3.95	1,468	4.44	13	4.64	2,801	3.87	11	6.21	2,380	5.48	
Middle (80-119% of Median)	161	15.45	32,390	12.68	71	16.40	14,405	14.02	25	16.45	4,546	13.74	30	13.57	8,482	11.72	27	15.25	4,905	11.44	
Upper (>=120% of Median)	791	76.91	198,147	78.77	326	75.29	80,878	77.94	114	75.00	25,717	77.73	218	77.86	57,724	79.78	133	75.14	34,648	79.81	
Income Not Available	40	3.84	10,595	4.21	19	4.39	5,019	4.89	7	4.61	1,255	4.10	9	3.21	3,110	4.31	5	2.82	1,103	2.54	
Tract / BNA Characteristics																					
Substantially Minority	625	59.98	145,120	57.68	250	57.74	55,828	54.34	87	57.24	19,112	57.76	177	63.21	44,078	60.92	111	62.71	26,102	60.13	
Not Substantially Minority	417	40.02	106,470	42.32	183	42.26	46,915	45.66	65	42.76	13,974	42.24	103	36.79	28,272	39.08	66	37.29	17,309	39.67	
Low (0-49% of Median)	15	1.44	2,679	1.06	3	0.69	679	0.64	2	1.32	379	1.15	8	2.86	1,277	1.77	2	1.13	344	0.79	
Moderate (50-79% of Median)	592	56.01	130,375	55.00	254	58.66	57,014	55.49	76	50.00	15,853	47.91	154	55.00	40,095	55.42	108	61.02	25,413	58.54	
Middle (80-119% of Median)	434	41.65	110,306	43.84	175	40.42	44,820	43.62	74	48.68	16,854	50.94	118	42.14	30,978	42.82	67	37.85	17,654	40.67	
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
NA	1	0.10	230	0.09	1	0.23	230	0.22	0	-	0	-	0	-	0	-	0	-	0	-	
Low/Moderate and/or Sub Minority	738	70.83	171,655	68.23	304	70.21	67,496	65.69	101	66.45	22,155	66.96	201	71.79	50,859	70.30	132	74.58	31,145	71.74	
All Other Census Tracts	304	29.17	79,935	31.77	129	29.79	35,247	34.31	51	33.55	10,931	33.04	79	28.21	21,491	29.70	45	25.42	12,266	28.26	
Applicant Sex																					
Male	406	38.96	96,468	38.38	157	36.26	38,055	37.04	49	45.39	14,373	43.44	112	40.00	27,808	38.44	68	38.42	16,252	37.44	
Female	304	28.95	93,096	37.00	160	36.95	37,461	36.46	57	37.50	12,237	36.99	103	36.79	27,241	37.79	64	36.16	16,047	36.97	
Joint	249	23.90	61,140	24.30	115	26.56	26,886	26.27	36	17.11	6,476	19.57	45	16.31	17,201	23.77	43	24.29	10,477	24.13	
Not Applicable	3	0.29	876	0.35	1	0.23	241	0.23	0	-	0	-	0	-	0	-	2	1.13	625	1.46	
Total	1,042	100.00	251,590	100.00	433	100.00	102,743	100.00	152	100.00	33,086	100.00	280	100.00	72,350	100.00	177	100.00	43,411	100.00	

Victorville FFIEC-Style Summary Spreadsheet - Black or African American Applicant Income 2007

Loan Purpose and Type	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete					
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%		
Purchase - Conventional	669	32.43	155,716	32.01	275	41.04	64,736	42.92	88	39.11	19,491	37.41	223	26.27	53,771	26.29	83	26.02	17,718	22.41		
Purchase - Government	29	1.41	8,120	1.67	16	2.39	4,679	3.10	1	0.44	153	0.29	5	0.59	1,488	0.73	7	2.19	1,800	2.20		
Home Improvement	238	11.54	36,002	7.42	55	8.21	5,985	3.97	14	6.22	1,603	3.08	134	15.78	20,203	9.88	35	10.97	8,291	10.49		
Refinancing	1,127	54.63	286,617	58.91	324	49.36	75,429	50.01	122	54.22	30,851	59.22	487	57.36	129,088	63.11	194	60.82	51,249	64.82		
Applicant Race																						
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	1,995	96.70	472,154	97.04	646	96.42	146,016	96.81	219	97.33	50,754	97.42	819	96.47	197,777	96.69	311	97.49	77,607	98.16		
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	68	3.30	14,381	2.96	24	3.58	4,813	3.19	6	2.67	1,344	2.58	30	3.53	6,773	3.31	8	2.51	1,451	1.84		
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																						
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	2,025	98.16	477,720	98.19	657	98.06	148,107	98.20	222	98.67	51,263	98.40	829	97.64	199,639	97.60	317	99.37	78,711	99.56		
Joint (Hisp/Lat / Not Hisp/Lat)	38	1.84	8,015	1.61	13	1.94	2,722	1.80	3	1.33	835	1.60	20	2.36	4,911	2.40	2	0.63	347	0.44		
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																						
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	2,063	100.00	486,538	100.00	670	100.00	150,829	100.00	228	100.00	52,098	100.00	849	100.00	204,580	100.00	319	100.00	79,058	100.00		
Applicant Income																						
Low (0-49% of Median)	40	1.94	5,803	1.19	11	1.61	1,360	0.90	2	0.89	327	0.63	23	2.71	3,313	1.62	4	1.25	803	1.02		
Moderate (50-79% of Median)	213	10.32	38,138	7.84	68	10.15	10,986	7.28	16	7.11	2,495	4.79	89	10.48	16,702	8.17	40	12.54	7,955	10.06		
Middle (80-119% of Median)	530	25.69	120,262	24.72	169	25.22	30,006	25.22	54	24.00	11,403	21.89	237	27.92	53,771	26.29	70	21.94	17,052	21.57		
Upper (>=120% of Median)	1,199	58.12	302,906	62.27	403	60.15	95,438	63.28	142	63.11	35,234	67.43	472	55.59	124,508	60.87	182	57.05	47,806	60.47		
Income Not Available	81	3.93	19,346	3.98	19	2.84	5,009	3.32	11	4.89	2,639	5.07	28	3.30	6,256	3.06	23	7.21	5,442	6.88		
Tract/BNA Characteristics																						
Substantially Minority	1,360	66.31	313,707	64.46	421	62.84	89,670	59.45	164	72.09	37,227	71.46	569	67.02	135,841	66.41	214	67.08	50,969	64.47		
Not Substantially Minority	695	33.69	172,828	35.52	249	37.16	61,159	40.55	61	27.11	14,871	28.54	280	32.98	68,789	33.59	105	32.92	26,889	35.53		
Low (0-49% of Median)	29	1.41	5,420	1.11	10	1.49	1,654	1.10	1	0.44	195	0.37	12	1.41	2,394	1.17	6	1.88	1,177	1.49		
Moderate (50-79% of Median)	1,191	57.73	270,021	55.50	375	55.57	80,769	53.55	150	66.67	32,654	62.68	491	57.83	114,839	56.14	175	54.86	41,759	52.82		
Middle (80-119% of Median)	837	40.57	209,199	43.00	282	42.09	67,708	44.89	74	32.89	19,249	36.95	243	40.40	86,120	42.10	138	43.28	36,122	45.69		
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	6	0.29	1,895	0.39	3	0.45	698	0.46	0	-	0	-	3	0.35	1,197	0.59	0	-	0	-		
Low/Mod and/or Sub Minority	1,543	74.79	352,126	72.37	490	73.13	104,604	69.35	186	82.67	41,252	79.37	640	75.38	152,156	74.39	227	71.16	54,014	68.32		
All Other Census Tracts	520	25.21	134,409	27.63	180	26.87	46,225	30.65	39	17.33	10,746	20.63	209	24.62	52,394	25.61	92	28.84	25,044	31.68		
Applicant Sex																						
Male	725	35.14	169,333	34.80	219	32.69	49,320	32.70	82	36.44	18,306	35.14	302	35.57	71,130	34.77	122	38.24	30,577	38.68		
Female	823	39.89	189,525	38.95	261	38.96	59,484	39.44	94	41.78	21,693	41.64	340	40.05	77,589	37.93	128	40.13	30,759	38.91		
Joint	312	14.82	128,848	26.67	190	28.38	42,825	27.86	49	21.78	12,099	23.22	206	24.28	55,470	27.12	67	21.00	17,294	21.82		
Not Applicable	3	0.15	829	0.17	0	-	0	-	0	-	0	-	1	0.12	361	0.16	2	0.63	468	0.59		
Total	2,063	100.00	486,538	100.00	670	100.00	150,829	100.00	228	100.00	52,098	100.00	849	100.00	204,580	100.00	319	100.00	79,058	100.00		

Victorville FFIEC-Style Summary Spreadsheet - Hispanic Applicant Income 2007

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete					
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%		
Loan Purpose and Type																						
Purchase - Conventional	3,576	39.44	762,552	38.92	1,596	47.04	330,691	47.28	503	43.85	106,626	44.20	959	30.17	216,541	30.19	518	38.40	108,694	36.06		
Purchase - Government	128	1.41	32,688	1.67	73	2.15	19,098	2.73	8	0.70	1,880	0.78	22	0.69	5,894	0.82	25	1.85	5,826	1.93		
Home Improvement	837	9.23	107,204	5.47	238	7.01	26,661	3.81	84	7.32	7,414	3.07	422	13.27	58,252	8.12	93	6.89	14,877	4.94		
Refinancing	4,527	49.92	1,057,015	53.94	1,486	43.00	323,075	46.10	552	48.13	125,292	51.94	1,776	55.67	436,689	60.67	713	52.85	171,990	57.07		
Applicant Race																						
American Indian/Alaska Native	566	6.23	111,525	5.49	122	3.60	21,627	3.09	33	2.88	7,109	2.95	319	10.03	65,374	9.11	91	6.75	17,415	5.78		
Asian	42	0.46	9,843	0.50	17	0.50	3,329	0.48	5	0.44	1,128	0.47	13	0.41	3,482	0.49	7	0.52	1,904	0.63		
Black or African American	43	0.47	10,223	0.52	10	0.29	2,000	0.29	2	0.17	502	0.21	23	0.72	6,157	0.86	8	0.59	1,564	0.52		
Hawaiian / Pacific Islander	118	1.30	23,639	1.21	51	1.50	9,997	1.43	7	0.61	1,099	0.46	54	1.70	11,363	1.58	6	0.44	1,180	0.39		
White	7,294	80.44	1,597,204	81.51	2,828	83.35	587,022	83.92	1,000	87.18	209,906	87.02	2,401	75.53	558,292	77.82	1,065	78.95	241,984	80.29		
2 or More Minority Races	7	0.08	1,079	0.06	1	0.03	150	0.02	1	0.09	50	0.02	5	0.16	879	0.12	0	-	0	-		
Joint Race (White/Minority)	71	0.78	15,982	0.82	29	0.85	6,633	0.95	4	0.35	853	0.35	32	1.01	7,336	1.02	6	0.44	1,160	0.38		
Race Not Available	928	10.23	189,964	9.69	305	9.07	68,727	9.83	95	8.28	20,565	8.53	332	10.44	64,492	8.99	166	12.31	36,180	12.00		
Applicant Ethnicity																						
Hispanic or Latino	8,799	96.92	1,896,799	96.75	3,271	96.40	674,278	96.40	1,124	97.99	236,120	97.89	3,084	97.01	694,134	96.76	1,310	97.11	291,257	96.64		
Not Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-		
Joint (Hisp/Lat / Not Hisp/Lat)	279	3.08	63,670	3.25	122	3.60	25,207	3.60	23	2.01	5,092	2.11	95	2.99	23,241	3.24	39	2.89	10,130	3.36		
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-		
Minority Status																						
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-		
Others, Including Hispanic	9,068	100.00	1,959,459	100.00	3,393	100.00	699,495	100.00	1,147	100.00	241,212	100.00	3,179	100.00	717,375	100.00	1,349	100.00	301,387	100.00		
Applicant Income																						
Low (0-49% of Median)	216	2.30	32,949	1.68	51	1.50	6,555	0.94	17	1.49	2,060	0.86	121	3.81	19,270	2.69	27	2.00	4,956	1.64		
Moderate (50-79% of Median)	918	10.12	157,522	8.04	337	9.93	54,083	7.73	94	8.20	14,214	5.89	374	11.76	70,618	9.84	113	8.38	18,607	6.17		
Middle (80-119% of Median)	2,637	29.00	536,960	27.51	1,012	29.03	195,966	28.02	331	28.66	66,669	27.64	946	29.76	199,979	27.60	340	25.00	76,326	25.32		
Upper (>=120% of Median)	4,909	54.14	1,143,771	58.37	1,835	54.08	409,678	58.57	683	56.93	146,017	60.53	1,638	51.53	404,595	56.40	783	58.04	183,481	60.88		
Income Not Available	386	4.28	86,357	4.41	158	4.66	33,183	4.74	52	4.53	12,244	5.08	100	3.15	22,913	3.19	78	5.78	18,017	5.98		
Tract/BNA Characteristics																						
Substantially Minority	5,929	65.38	1,243,061	63.44	2,200	64.94	436,590	62.41	723	63.91	147,966	61.34	2,121	66.72	465,015	64.92	875	64.86	193,500	64.20		
Not Substantially Minority	3,139	34.62	716,398	36.56	1,193	35.16	262,905	37.59	414	36.09	93,246	38.66	1,058	33.28	252,360	35.16	474	35.14	107,887	35.60		
Low (0-49% of Median)	207	2.28	38,650	1.97	75	2.21	12,244	1.75	29	2.53	5,021	2.41	75	2.36	14,658	2.04	20	2.00	5,927	1.97		
Moderate (50-79% of Median)	5,279	58.22	1,100,075	56.14	1,998	58.80	393,688	56.28	682	56.94	133,087	55.17	1,880	59.14	410,225	57.18	752	55.74	163,075	54.11		
Middle (80-119% of Median)	3,575	39.42	819,601	41.83	1,323	38.99	293,553	41.97	463	40.37	102,024	42.30	1,223	38.47	292,238	40.74	566	41.96	131,786	43.73		
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-		
NA	7	0.08	1,133	0.06	0	-	0	-	3	0.26	280	0.12	1	0.03	254	0.04	3	0.22	599	0.20		
Low/Mod and/or Sub Minority	6,006	75.06	1,421,706	72.56	2,557	75.36	504,620	72.14	950	74.11	172,654	71.58	2,392	75.24	525,020	73.19	1,007	74.65	219,494	72.82		
All Other Census Tracts	2,262	24.94	537,673	27.44	836	24.64	194,857	27.86	297	25.89	68,558	28.42	787	24.76	192,355	26.81	342	25.35	81,903	27.18		
Applicant Sex																						
Male	4,134	45.59	896,578	45.76	1,582	45.74	321,133	45.91	543	47.34	117,941	48.68	1,409	44.32	319,685	44.56	630	46.70	138,449	45.94		
Female	2,277	25.11	487,624	24.89	813	23.96	165,916	23.72	301	26.24	63,724	26.42	812	25.54	179,331	25.00	351	26.02	78,653	26.10		
Joint	2,620	28.89	567,732	28.97	1,014	29.89	210,217	30.05	300	26.16	59,451	24.85	981	29.92	216,874	30.20	385	28.32	81,290	27.01		
Not Applicable	37	0.41	7,525	0.38	14	0.41	2,219	0.32	3	0.26	696	0.29	7	0.22	1,715	0.24	13	0.96	2,895	0.96		
Total	9,068	100.00	1,959,459	100.00	3,393	100.00	699,495	100.00	1,147	100.00	241,212	100.00	3,179	100.00	717,375	100.00	1,349	100.00	301,387	100.00		

Victorville FFIEC-Style Summary Spreadsheet – White Applicant Income 2007

Loan Purpose and Type	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Purchase - Conventional	1,662	25.68	366,283	26.24	823	29.37	176,859	30.77	202	30.01	43,149	30.92	393	19.61	89,823	19.96	244	24.55	56,452	24.38
Purchase - Government	106	1.64	24,260	1.74	67	2.39	15,790	2.74	9	1.34	1,067	1.24	14	0.70	3,643	0.81	16	1.61	3,010	1.30
Home Improvement	890	12.98	101,243	7.25	324	11.56	36,639	6.38	78	11.59	6,514	4.67	328	16.37	40,940	9.10	110	11.07	17,150	7.41
Refinancing	3,065	59.71	904,102	64.77	1,588	56.67	345,474	60.11	394	57.06	80,023	62.07	1,269	62.32	315,658	70.14	624	62.78	154,948	66.91
Applicant Race																				
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	6,257	98.21	1,371,710	98.27	2,758	98.43	566,567	98.58	665	98.81	137,798	98.74	1,964	98.00	441,875	98.18	970	97.59	225,470	97.37
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	116	1.79	24,179	1.73	44	1.57	8,146	1.42	8	1.19	1,755	1.26	40	2.00	8,189	1.82	24	2.41	6,090	2.62
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																				
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	6,242	96.43	1,366,307	96.45	2,712	96.79	557,127	96.94	653	97.03	135,760	97.28	1,925	96.11	432,201	96.03	951	95.67	221,219	95.53
Joint (Hisp/Lat / Not Hisp/Lat)	231	3.57	49,582	3.55	90	3.21	17,585	3.06	20	2.97	3,792	2.72	78	3.89	17,862	3.97	43	4.33	10,241	4.47
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	6,151	95.03	1,327,615	95.11	2,671	95.32	549,697	95.65	646	95.99	134,085	96.08	1,899	94.76	426,350	94.73	935	94.06	217,483	93.92
Others, Including Hispanic	322	4.97	68,274	4.89	131	4.68	25,015	4.35	27	4.01	3,668	3.92	105	5.24	23,714	5.27	59	5.94	14,077	5.08
Applicant Income																				
Low (0-49% of Median)	229	3.54	26,629	1.91	81	2.89	8,918	1.55	19	2.82	2,205	1.58	100	4.99	11,304	2.51	29	2.92	4,202	1.81
Moderate (50-79% of Median)	723	11.17	120,715	8.65	294	10.49	44,421	7.73	56	8.32	8,307	5.95	248	12.38	46,316	10.29	125	12.58	21,671	9.26
Middle (80-119% of Median)	1,708	26.39	343,949	24.64	765	27.30	143,954	25.05	140	21.99	28,020	20.65	519	25.90	110,310	24.51	276	27.77	60,865	26.28
Upper (>=120% of Median)	3,952	54.87	816,610	60.65	1,858	65.32	353,430	61.50	415	61.64	93,290	66.85	1,068	53.29	265,908	59.06	519	52.21	133,982	57.66
Income Not Available	281	4.03	57,906	4.15	112	4.00	23,889	4.17	35	5.20	6,931	4.97	69	3.44	16,226	3.61	45	4.53	10,040	4.68
Tract/BNA Characteristics																				
Substantially Minority	3,305	51.06	678,007	48.58	1,375	49.07	262,247	45.63	329	49.78	67,333	48.25	1,072	53.49	230,955	51.32	523	52.62	117,952	50.77
Not Substantially Minority	3,168	48.94	717,802	51.42	1,427	50.93	312,465	54.37	338	50.22	72,220	51.75	932	46.51	219,109	48.68	471	47.38	114,008	49.23
Low (0-49% of Median)	57	0.89	9,626	0.69	20	0.71	3,188	0.55	0	1.19	1,190	0.86	22	1.10	3,644	0.81	7	0.70	1,596	0.69
Moderate (50-79% of Median)	2,985	46.11	609,129	43.64	1,244	44.40	237,319	41.29	313	46.51	65,039	46.61	956	47.70	203,543	45.23	472	47.48	103,228	44.58
Middle (80-119% of Median)	3,431	53.00	777,134	56.67	1,538	54.89	324,205	56.19	352	52.30	73,316	52.94	1,028	51.20	242,877	53.96	515	51.81	126,736	54.73
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mod and/or Sub Minority	3,942	60.90	810,634	58.07	1,641	58.07	314,667	54.75	400	59.44	80,053	57.36	1,264	63.07	272,656	60.58	637	64.08	143,258	61.87
All Other Census Tracts	2,531	39.10	585,255	41.93	1,161	41.43	260,045	45.25	273	40.56	59,500	42.64	740	36.93	177,408	39.42	357	35.92	88,302	38.13
Applicant Sex																				
Male	2,329	35.96	513,145	36.76	933	33.30	191,815	33.30	261	38.78	56,325	40.37	767	38.27	177,179	39.37	360	37.02	87,816	37.92
Female	1,422	21.97	302,616	21.68	580	20.70	117,135	20.38	153	22.73	33,439	23.96	465	23.20	101,991	22.66	224	22.54	50,051	21.61
Joint	2,701	41.73	875,607	61.24	1,286	45.90	284,909	49.10	257	38.19	49,259	35.37	759	37.87	188,524	37.40	399	39.99	92,995	40.16
Not Applicable	21	0.32	4,521	0.32	3	0.11	833	0.14	2	0.30	420	0.30	13	0.65	2,570	0.57	3	0.30	688	0.30
Total	6,473	100.00	1,395,889	100.00	2,882	100.00	674,712	100.00	673	100.00	139,553	100.00	2,884	100.00	450,964	100.00	994	100.00	231,560	100.00

Victorville FFIEC-Style Summary Spreadsheet – Asian Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Loan Purpose and Type																				
Purchase - Conventional	226	57.07	24,395	52.31	147	69.00	15,456	52.81	22	75.86	2,263	73.64	39	52.00	4,186	47.71	18	38.30	2,450	45.00
Purchase - Government	78	19.70	10,616	22.80	52	21.22	7,206	24.72	4	13.79	529	17.21	9	12.00	1,224	14.06	13	27.66	1,617	29.70
Home Improvement	11	2.78	664	1.43	2	0.82	170	0.58	1	3.45	80	2.63	5	6.67	199	2.27	3	6.38	205	3.77
Refinancing	81	20.45	10,922	23.46	44	17.96	6,404	21.88	2	6.90	191	6.22	22	29.33	3,155	35.96	13	27.66	1,172	21.53
Applicant Race																				
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	389	98.23	45,471	97.67	240	97.96	28,371	96.94	29	100.00	3,073	100.00	74	98.67	8,679	98.92	46	97.87	5,348	98.24
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	7	1.77	1,006	2.33	5	2.04	895	3.06	0	-	0	-	1	1.33	95	1.08	1	2.13	96	1.76
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																				
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	393	99.24	46,285	99.37	242	98.78	28,974	99.00	29	100.00	3,073	100.00	75	100.00	8,774	100.00	47	100.00	5,444	100.00
Joint (His/Lat / Not His/Lat)	3	0.76	292	0.63	3	1.22	292	1.00	0	-	0	-	0	-	0	-	0	-	0	-
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	396	100.00	46,557	100.00	245	100.00	29,266	100.00	29	100.00	3,073	100.00	75	100.00	8,774	100.00	47	100.00	5,444	100.00
Applicant Income																				
Low (0-49% of Median)	65	16.41	6,666	14.32	29	15.92	3,056	13.18	4	13.79	400	13.02	13	17.33	1,441	16.42	9	19.15	969	17.00
Moderate (50-79% of Median)	105	26.52	12,093	25.97	59	24.08	6,852	23.41	8	27.59	1,013	32.96	22	29.33	2,574	29.34	16	34.04	1,654	30.38
Middle (80-119% of Median)	76	19.19	8,991	19.51	46	18.78	5,640	19.27	9	31.03	875	28.47	12	16.00	1,431	16.31	9	19.15	1,045	19.20
Upper (>=120% of Median)	127	32.07	15,630	33.57	87	35.51	10,537	36.00	7	24.14	715	23.27	21	28.00	2,771	31.58	12	25.53	1,607	29.52
Income Not Available	23	5.81	3,177	6.82	14	5.71	2,381	8.14	1	3.45	70	2.28	7	9.33	557	6.35	1	2.13	169	3.10
Tract/BNA Characteristics																				
Substantially Minority	205	51.77	21,350	45.86	120	48.98	12,908	44.11	15	51.72	1,463	47.61	41	54.67	4,267	48.63	29	61.70	2,712	49.82
Not Substantially Minority	191	48.23	25,207	54.14	125	51.02	16,358	55.89	14	48.28	1,610	52.39	34	45.33	4,507	51.37	18	38.30	2,732	50.18
Low (0-49% of Median)	3	0.76	123	0.26	0	-	0	-	0	-	0	-	0	-	0	-	3	6.38	123	2.28
Moderate (50-79% of Median)	207	52.27	22,021	47.30	123	50.20	13,324	45.53	17	58.62	1,648	53.63	41	54.67	4,425	50.43	26	55.32	2,624	48.20
Middle (80-119% of Median)	186	46.97	24,413	52.44	122	49.80	15,942	54.47	12	41.38	1,425	46.27	34	45.33	4,349	49.57	18	38.30	2,697	49.54
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mod and/or Sub Minority	249	62.88	26,070	56.00	145	59.18	15,560	53.24	20	68.97	1,952	63.52	52	69.33	5,453	62.15	32	68.09	3,085	56.67
All Other Census Tracts	147	37.12	20,487	44.00	100	40.82	13,696	46.76	9	31.03	1,121	36.40	23	30.67	3,321	37.85	15	31.91	2,259	43.33
Applicant Sex																				
Male	178	44.95	20,344	43.70	105	42.86	12,236	41.81	14	48.28	1,530	49.79	36	48.00	4,169	47.52	23	48.94	2,409	44.25
Female	108	27.27	12,084	25.96	75	30.61	8,802	30.08	9	31.03	896	29.16	19	25.33	1,699	19.36	5	10.64	687	12.62
Joint	110	27.78	14,129	30.25	65	26.53	8,228	28.11	6	20.69	647	21.05	20	26.67	2,906	33.12	19	40.43	2,048	43.13
Not Applicable	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Total	396	100.00	46,557	100.00	245	100.00	29,266	100.00	29	100.00	3,073	100.00	75	100.00	8,774	100.00	47	100.00	5,444	100.00

Victorville FFIEC-Style Summary Spreadsheet - Black or African American Applicant Income 2010

Loan Purpose and Type	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Purchase - Conventional	44	10.63	4,361	7.77	25	11.52	2,565	8.77	8	33.33	862	28.72	9	8.74	731	5.51	2	2.86	203	1.92
Purchase - Government	254	61.35	36,495	65.03	150	69.12	21,537	73.61	7	29.17	911	30.36	57	55.34	8,282	62.27	40	57.14	5,775	54.58
Home Improvement	20	4.83	675	1.20	5	2.30	75	0.26	0	-	0	-	12	11.65	311	2.34	3	4.29	289	2.73
Refinancing	96	23.19	14,586	26.00	37	17.05	5,000	17.36	9	37.50	1,228	40.92	25	24.27	3,964	29.88	25	35.71	4,314	40.77
Applicant Race																				
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Black or African American	399	96.38	53,941	96.14	210	96.77	28,208	96.41	23	95.83	2,831	94.34	101	98.06	13,014	98.09	65	92.86	9,888	93.45
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
White	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	15	3.62	2,146	3.96	7	3.23	1,049	3.59	1	4.17	170	5.66	2	1.94	254	1.91	5	7.14	693	6.55
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Applicant Ethnicity																				
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Not Hispanic or Latino	411	99.20	55,570	99.04	215	99.00	28,990	98.75	23	95.83	2,831	94.34	103	100.00	13,268	100.00	70	100.00	10,581	100.00
Joint (Hisp/Lat / Not Hisp/Lat)	3	0.72	537	0.96	2	0.92	367	1.25	1	4.17	170	5.66	0	-	0	-	0	-	0	-
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	414	100.00	56,107	100.00	217	100.00	29,257	100.00	24	100.00	3,001	100.00	103	100.00	13,268	100.00	70	100.00	10,581	100.00
Applicant Income																				
Low (0-49% of Median)	61	14.73	5,838	10.41	34	15.67	3,445	11.77	3	12.50	293	9.76	19	18.45	1,468	11.06	5	7.14	632	5.97
Moderate (50-79% of Median)	124	29.95	16,815	29.97	70	32.26	9,602	33.09	6	25.00	626	20.86	31	30.10	4,143	31.23	17	24.29	2,364	22.34
Middle (80-119% of Median)	82	19.81	11,851	21.12	52	23.96	7,173	24.52	3	12.50	465	15.49	20	19.42	2,950	22.23	7	10.00	1,263	11.94
Upper (>=120% of Median)	69	21.50	13,516	24.09	43	19.62	6,321	21.61	7	29.17	615	27.16	24	23.30	3,693	27.03	15	21.43	2,687	25.39
Income Not Available	58	14.01	8,087	14.41	18	8.29	2,636	9.01	5	20.83	802	26.72	9	8.74	1,014	7.64	26	37.14	3,635	34.35
Tract/BNA Characteristics																				
Substantially Minority	240	57.97	28,047	51.41	137	63.13	17,460	59.71	10	41.67	869	28.96	54	52.43	5,422	40.87	39	55.71	5,088	48.09
Not Substantially Minority	174	42.03	27,260	48.58	80	36.87	11,798	40.29	14	58.33	2,132	71.04	49	47.57	7,846	59.13	31	44.29	5,493	51.91
Low (0-49% of Median)	1	0.24	67	0.12	0	-	0	-	0	-	0	-	1	0.97	67	0.50	0	-	0	-
Moderate (50-79% of Median)	228	55.07	28,239	50.33	123	56.68	16,177	55.29	9	37.50	790	26.32	53	51.46	5,471	41.23	43	61.43	5,801	54.82
Middle (80-119% of Median)	105	44.69	27,801	49.55	54	43.32	13,080	44.71	15	62.50	2,211	73.68	49	47.57	7,730	58.26	27	38.57	4,790	45.10
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mod and/or Sub Minority	267	64.49	32,455	57.84	153	70.51	19,990	66.96	10	41.67	869	28.96	60	58.25	6,048	45.58	44	62.86	5,948	56.21
All Other Census Tracts	147	35.51	23,652	42.16	64	29.49	9,667	33.04	14	58.33	2,132	71.04	43	41.75	7,220	54.42	26	37.14	4,633	43.79
Applicant Sex																				
Male	186	44.93	24,954	44.48	91	41.94	12,109	41.39	4	16.67	467	15.56	52	50.49	6,778	51.09	39	55.71	5,600	52.93
Female	150	36.23	19,623	34.97	88	40.55	11,653	39.83	13	54.17	1,533	51.08	34	33.01	4,346	32.76	15	21.43	2,091	19.76
Joint	77	18.60	11,410	20.34	37	17.05	5,375	18.37	7	29.17	1,001	33.36	17	16.50	2,144	16.16	16	22.86	2,890	27.31
Not Applicable	1	0.24	120	0.21	1	0.46	120	0.41	0	-	0	-	0	-	0	-	0	-	0	-
Total	414	100.00	56,107	100.00	217	100.00	29,257	100.00	24	100.00	3,001	100.00	103	100.00	13,268	100.00	70	100.00	10,581	100.00

Victorville FFIEC-Style Summary Spreadsheet – Hispanic Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete			
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%
Loan Purpose and Type																				
Purchase - Conventional	299	15.09	27,967	11.61	167	14.26	15,517	10.74	19	19.00	1,958	15.90	74	18.59	7,120	15.27	39	12.50	3,372	9.00
Purchase - Government	1,234	62.29	154,909	64.32	700	66.61	96,030	68.42	58	58.00	7,198	58.45	200	52.26	26,032	55.04	106	60.26	22,640	61.01
Home Improvement	38	1.92	607	0.25	13	1.11	136	0.09	2	2.00	54	0.44	16	4.02	390	0.84	7	2.24	27	0.07
Refinancing	410	20.70	57,342	23.81	211	18.02	29,963	20.74	21	21.00	3,105	25.21	100	25.13	13,074	28.05	70	25.00	11,200	29.91
Applicant Race																				
American Indian/Alaska Native	71	3.58	6,504	3.53	40	3.42	5,412	3.75	1	1.00	86	0.70	18	4.52	1,685	3.61	12	3.85	1,321	3.53
Asian	8	0.40	1,028	0.42	3	0.26	293	0.27	1	1.00	93	0.76	2	0.50	223	0.48	2	0.64	319	0.85
Black or African American	11	0.56	1,805	0.75	7	0.60	1,311	0.91	0	-	0	-	3	0.75	395	0.85	1	0.32	99	0.26
Hawaiian / Pacific Islander	8	0.40	981	0.41	5	0.43	607	0.42	0	-	0	-	2	0.50	239	0.51	1	0.32	135	0.36
White	1,702	85.92	207,049	85.97	1,024	97.45	125,530	86.90	91	91.00	10,905	88.55	334	83.92	39,540	84.02	253	81.09	31,073	82.90
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	18	0.91	2,150	0.89	10	0.85	1,242	0.93	1	1.00	136	1.10	6	1.51	541	1.16	1	0.32	131	0.35
Race Not Available	163	8.23	19,308	8.02	82	7.00	9,851	6.82	6	6.00	1,095	8.89	33	8.29	3,993	8.57	42	13.46	4,369	11.67
Applicant Ethnicity																				
Hispanic or Latino	1,900	95.91	229,800	95.42	1,123	95.50	130,029	95.56	92	95.00	11,229	91.18	301	95.73	44,490	95.44	301	96.47	36,042	96.25
Not Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Joint (Hisp/Lat / Not Hisp/Lat)	81	4.09	11,024	4.58	48	4.10	6,407	4.44	5	5.00	1,086	8.82	17	4.27	2,126	4.56	11	3.53	1,405	3.75
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Minority Status																				
White Non-Hispanic	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Others, Including Hispanic	1,901	100.00	240,824	100.00	1,171	100.00	144,446	100.00	100	100.00	12,315	100.00	398	100.00	46,616	100.00	312	100.00	37,447	100.00
Applicant Income																				
Low (0-19% of Median)	581	29.33	56,538	23.48	341	29.12	33,052	22.88	28	28.00	2,689	21.84	121	30.40	11,606	24.90	91	29.17	9,191	24.54
Moderate (20-39% of Median)	642	32.41	77,324	32.11	394	33.65	47,667	33.00	32	32.00	4,988	37.61	124	31.16	14,261	30.59	92	29.49	10,838	28.94
Middle (40-59% of Median)	366	18.48	49,682	20.63	223	19.04	31,214	21.61	21	21.00	2,715	22.05	78	19.60	9,670	20.74	44	14.10	6,083	16.24
Upper (60-79% of Median)	206	10.40	30,195	12.54	112	9.56	16,496	11.42	8	8.00	946	7.48	52	13.07	7,588	16.27	34	10.90	5,169	13.80
Income Not Available	106	5.39	27,085	11.25	101	8.63	16,018	11.09	11	11.00	1,407	11.43	23	5.78	3,494	7.50	51	16.25	6,166	16.47
Tract/BNA Characteristics																				
Substantially Minority	1,289	65.07	142,817	58.07	760	64.50	86,081	59.00	62	62.00	6,621	53.76	265	66.58	28,828	61.84	202	64.74	21,487	57.38
Not Substantially Minority	682	34.93	98,807	41.03	411	35.10	59,365	41.10	38	38.00	5,694	46.24	133	33.42	17,788	38.16	110	35.26	15,960	42.62
Low (0-19% of Median)	24	1.21	2,163	0.90	11	0.94	982	0.68	3	3.00	336	2.73	5	1.26	452	0.97	5	1.60	393	1.05
Moderate (20-39% of Median)	1,166	58.86	130,016	53.99	679	57.98	77,274	53.50	51	51.00	5,114	40.96	238	59.80	25,977	55.73	198	63.46	21,351	57.02
Middle (40-59% of Median)	791	39.93	108,645	45.11	491	41.00	66,190	45.82	46	46.00	6,565	53.31	155	39.94	20,107	43.30	109	34.94	15,703	41.93
Upper (60-79% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-
Low/Mod and/or Sub Minority	1,431	72.24	159,107	66.07	849	72.42	95,915	66.40	70	70.00	7,616	61.84	287	72.11	31,267	67.07	226	72.44	24,309	64.92
All Other Census Tracts	550	27.76	81,717	33.93	323	27.58	48,531	33.60	30	30.00	4,699	38.16	111	27.89	15,349	32.93	86	27.56	13,138	35.08
Applicant Sex																				
Male	923	46.59	110,593	45.92	526	45.69	64,420	44.60	51	51.00	5,955	48.36	182	45.73	21,842	46.06	155	49.68	18,368	49.05
Female	509	25.69	57,088	23.71	301	25.70	34,498	23.88	27	27.00	3,240	26.31	107	26.88	11,110	23.83	74	23.72	8,250	22.03
Joint	544	27.46	72,466	30.09	324	28.52	45,442	31.46	22	22.00	3,120	25.33	108	27.14	13,401	28.75	80	25.64	10,503	28.05
Not Applicable	5	0.25	677	0.28	1	0.09	88	0.06	0	-	0	-	1	0.25	263	0.56	3	0.96	326	0.87
Total	1,981	100.00	240,824	100.00	1,171	100.00	144,446	100.00	100	100.00	12,315	100.00	398	100.00	46,616	100.00	312	100.00	37,447	100.00

Victorville FFIEC-Style Summary Spreadsheet – White Applicant Income 2010

	Total Applications (1)				Originated (2)				Approved Not Accepted				Denied (3)				Withdrawn / Incomplete				
	Count	%	Amount	%	Units	%	Dollar \$(000)	%	Count	%	Amount	%	Count	%	Amount	%	Count	%	Amount	%	
Loan Purpose and Type																					
Purchase - Conventional	402	19.52	43,332	15.60	259	20.12	28,578	16.47	34	32.69	4,188	29.60	58	16.67	5,297	11.40	51	15.94	5,269	12.10	
Purchase - Government	809	39.29	110,896	39.93	573	44.52	77,959	44.92	23	22.12	2,603	18.40	93	26.72	14,283	30.73	120	37.50	16,051	36.87	
Home Improvement	58	2.82	2,490	0.90	23	1.79	938	0.54	1	0.96	150	1.06	24	6.90	963	2.07	10	3.13	439	1.01	
Refinancing	790	38.27	121,003	43.57	432	33.57	66,001	38.07	46	44.23	7,200	50.94	173	49.71	25,930	55.80	139	43.44	21,776	50.02	
Applicant Race																					
American Indian/Alaska Native	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Asian	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Black or African American	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Hawaiian / Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
White	2,021	98.15	271,463	97.75	1,261	97.98	169,495	97.66	100	96.15	13,567	95.89	344	98.85	45,500	97.89	316	98.75	42,901	98.54	
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Joint Race (White/Minority)	38	1.85	6,238	2.28	26	2.02	4,061	2.34	4	3.85	592	4.11	4	1.15	981	2.11	4	1.25	634	1.46	
Race Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Applicant Ethnicity																					
Hispanic or Latino	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Not Hispanic or Latino	1,978	96.07	266,435	96.94	1,233	95.80	166,642	96.02	102	98.00	13,766	97.29	337	96.94	44,573	96.90	306	95.63	41,454	96.22	
Joint (Hisp/Lat / Not Hisp/Lat)	81	3.93	11,286	4.06	54	4.20	6,914	3.98	2	1.92	383	2.71	11	3.16	1,908	4.10	14	4.38	2,081	4.78	
Ethnicity Not Available	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Minority Status																					
White Non-Hispanic	1,943	94.37	260,606	93.84	1,210	94.02	163,010	93.92	98	94.23	13,184	93.18	333	95.69	43,592	93.78	302	94.38	40,820	93.76	
Others, Including Hispanic	116	5.63	17,115	6.16	77	5.98	10,546	6.08	6	5.77	965	6.82	15	4.31	2,889	6.22	18	5.63	2,715	6.24	
Applicant Income																					
Low (0-49% of Median)	324	15.74	29,526	10.63	193	15.00	17,791	10.25	15	14.42	1,097	7.75	62	17.82	5,546	11.93	54	16.88	5,092	11.70	
Moderate (50-79% of Median)	470	22.83	54,147	19.50	308	23.93	35,586	20.50	28	26.92	3,253	22.99	80	22.99	9,152	19.69	54	16.88	6,156	14.14	
Middle (80-119% of Median)	459	22.29	62,883	22.64	285	22.14	39,105	22.53	18	17.31	2,490	17.60	81	23.28	11,659	25.00	75	23.44	9,629	22.12	
Upper (>=120% of Median)	577	28.02	93,517	33.67	355	27.58	56,273	32.42	30	28.85	4,751	33.58	100	28.74	16,274	35.01	92	28.75	16,219	37.26	
Income Not Available	229	11.12	37,648	13.56	146	11.34	24,801	14.29	13	12.50	2,588	18.08	25	7.18	3,850	8.28	46	14.06	6,439	14.79	
Tract/BSA Characteristics																					
Substantially Minority	880	42.74	90,049	35.59	566	43.98	64,669	37.26	43	41.35	4,512	31.89	137	39.27	14,126	30.29	124	41.88	15,542	35.70	
Not Substantially Minority	1,179	57.26	178,872	64.41	721	56.02	108,887	62.74	61	58.65	9,637	68.11	211	60.63	32,355	69.61	186	58.13	27,993	64.30	
Low (0-49% of Median)	8	0.39	619	0.22	4	0.31	257	0.21	0	-	0	-	3	0.86	165	0.35	1	0.31	97	0.22	
Moderate (50-79% of Median)	836	40.60	93,466	33.65	529	41.10	61,047	35.17	46	44.23	5,285	37.35	128	36.78	11,917	25.64	133	41.56	15,217	34.95	
Middle (80-119% of Median)	1,215	59.01	183,636	66.12	754	58.59	112,152	64.62	58	55.77	8,064	62.65	217	62.36	34,599	74.01	186	58.13	28,221	64.02	
Upper (>=120% of Median)	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
NA	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	
Low/Mod and/or Sub Minority	1,088	52.84	123,069	44.31	696	54.08	80,230	46.23	55	52.88	6,136	43.37	168	48.28	17,050	36.68	169	52.81	19,653	45.14	
All Other Census Tracts	971	47.16	154,652	55.69	591	45.92	93,326	53.77	49	47.12	8,013	56.63	100	51.72	29,431	63.32	151	47.19	23,602	54.06	
Applicant Sex																					
Male	806	39.15	103,877	37.40	480	37.20	62,875	35.77	50	48.00	6,464	45.69	142	40.80	18,071	38.88	134	41.88	17,267	39.66	
Female	481	23.36	57,403	20.67	301	23.39	37,265	21.47	20	19.23	2,300	16.26	82	23.56	8,707	18.73	78	24.38	9,131	20.97	
Joint	765	37.15	115,426	41.56	501	38.93	73,469	42.33	34	32.69	5,385	38.06	123	35.34	19,520	42.00	107	33.44	17,052	39.17	
Not Applicable	7	0.34	1,015	0.37	5	0.39	747	0.43	0	-	0	-	1	0.29	183	0.39	1	0.31	85	0.20	
Total	2,059	100.00	277,721	100.00	1,287	100.00	173,556	100.00	104	100.00	14,149	100.00	348	100.00	46,401	100.00	320	100.00	43,525	100.00	