SAN BERNARDINO COUNTY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2025-2030

CONTENTS

INTRODUCTION

Fair Housing Planning

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

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

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

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

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;

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

- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

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

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

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

To assist grantees and housing authorities in affirmatively furthering fair housing, HUD provided publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule mandated that, beginning in 2017, most grantees would use the new tool to prepare and submit to HUD an Assessment of Fair Housing; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In 2020, HUD further relaxed requirements to complete an AI, allowing grantees to instead simply certify that they were affirmatively furthering fair housing, without prescribing any specific method for documenting compliance.

As of the time this report was drafted, HUD had published a new proposed regulation describing yet another new process for grantees to evaluate and document compliance with their obligations to affirmatively further fair housing. Reverting to an approach similar to the Assessment of Fair Housing model that was briefly implemented in 2017, this latest regulatory proposal calls for what will be known as an Equity Plan. Until that new regulation is finalized and phased in, grantees must still affirmatively further fair housing, but are not bound to any particular guidelines for doing so. Given the uncertainty, many grantees, San Bernardino County included, have opted to continue using the longstanding Analysis of Impediments format that was required prior to the flurry of regulatory changes beginning in 2015.

Mosaic Community Planning partnered with San Bernardino County to develop this Analysis of Impediments to Fair Housing Choice. This AI follows HUD's Fair Housing Planning Guide but also incorporates elements of HUD's assessment tool established in the 2015 final rule. In some places, it uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule. It covers unincorporated San Bernardino County and the County's participating jurisdictions, including

Adelanto, Barstow, Big Bear Lake, Chino Hills*, Colton, Grand Terrace, Highland, Loma Linda, Montclair, Needles, Rancho Cucamonga*, Redlands, Twentynine Palms, Yucaipa, and the Town of Yucca Valley.

Definitions

Affirmatively Further Fair Housing

In keeping with current HUD regulations, Affirmatively Furthering Fair Housing (AFFH) is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." Specifically, this means "taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."[2]

Affordable

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

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

Fair Housing Choice

This Analysis of Impediments to Fair Housing Choice uses the following definition of Fair Housing Choice:

"Individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability. Fair housing choice encompasses:

> (1) Actual choice, which means the existence of realistic housing options;

> (2) Protected choice, which means housing that can be accessed without discrimination; and

> (3) Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting

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[2] 24 CFR Part 5.151.

appropriate to an individual's needs as required under Federal civil rights law, including disability-related services that an individual needs to live in such housing."[3]

Impediments to Fair Housing Choice

As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include: [4]

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

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

Protected Classes

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

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

Data Sources

Decennial Census Data

Data collected by the Decennial Census for 2020, 2010, and 2000 is used in this report (older Census data is only used in conjunction with more recent data to illustrate trends). This study uses several Census datasets:

2020 Decennial Census Demographic and Housing Characteristics File (DHC)

The 2020 Census Demographic and Housing Characteristics File (DHC) includes detailed data tables on the following:

- Subjects: Age, sex, race, Hispanic or Latino origin, household type, family type, relationship to householder, group quarters population, housing occupancy, and housing tenure

- Lowest level of geography: Varies, with many tables at the census block level

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[3] 24 CFR Part 5.151.

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

*Members of HOME Consortium only – these jurisdictions do not receive CDBG or ESG funding through the County.

- Many of the DHC tables are also available for ZIP Code Tabulation Areas (ZCTA) generalized representations of U.S. Postal Service ZIP Code service routes.

2010 and 2000 Census Summary File 1 (SF 1)

This dataset contains what is known as "100% data," meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

American Community Survey (ACS)

The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with annually updated population and housing data throughout each of the 10 years between censuses. ACS data is compiled from an annual sample of approximately three million addresses rather than an actual count (like the Decennial Census's data) and therefore is susceptible to sampling errors, however, the sampled ACS data involves a much more detailed questionnaire and provides data for many more demographic and housing variables than the Decennial Census. ACS data is released in two different formats: single-year estimates and multi-year estimates. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2018-2022 ACS 5-year estimates are used most often in this report.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)

HUD's AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD's latest data and maps, AFFHT0006, which was released in July 2020. HUD's source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD's Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation available online at:

https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

COMMUNITY PARTICIPATION PROCESS

Community Engagement Overview

An important component of the research process for the Analysis of Impediments to Fair Housing Choice involved gathering resident and stakeholder input regarding fair and affordable housing conditions, perceptions, and needs in San Bernardino County. The County used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including participation in public meetings, a communitywide survey, and a separate stakeholder and service provider survey.

Public Meetings

County staff attended 26 various meetings throughout the county to introduce the project and promote the survey. Meeting dates, types, and locations are shown below.

Meeting #	Type	Date	Location
1	Crest Forest Municipal Advisory Council Meeting	9/3/2024	San Moritz Lodge 24640 San Moritz Dr. Crestline, CA 92325
2	Bloomington Municipal Advisory Council Meeting	9/4/2024	Ayala Park Community Center 17909 Marygold Ave. Bloomington, CA 92316
3	Lake Arrowhead Municipal Advisory Council Meeting	9/5/2024	San Bernardino County Safety 26010 State Highway 189 Twin Peaks, CA 92391
4	City of Highland Meeting	9/10/2024	Highland City Hall 27215 Base Line Highland, CA 92346
5	Countywide Virtual Meeting	9/19/2024	Virtual via WebEx
6	Yucaipa Autumn Fest	9/27/2024	12062 California Street Yucaipa, CA 92399
7	Joint Central Valley HPN & RSC	10/2/2024	Gonzales Community Center 670 Colton Ave. Colton, CA 92324
8	City of Colton PAWS in the Park	10/5/2024	Cesar Chavez Park 600 Colton Ave. Colton, CA 92324
9	Oak Hills Municipal Advisory Council Meeting	10/7/2024	Fire Station 40 6584 Caliente Rd. Oak Hills, CA 92344
10	Desert Region RSC Meeting	10/8/2024	Life Church 12199 Industrial Blvd. Victorville, CA 92395

Meeting #	Type	Date	Location
11	West Valley Region RSC Meeting (Organization Provided Survey Only at the meeting)	10/9/2024	James L Brulte Senior Center 11200 Baseline Rd. Rancho Cucamonga, CA 91701
12	Montclair Community Health Fair	10/10/2024	Montclair Community Center 5111 Benito St. Montclair, CA 91763
13	Joint Mountain HPN & RSC	10/14/2024	St. Richard's Episcopal Church 28708 CA Hwy. 18 Skyforest, CA 92385
14	Spring Valley Lake Municipal Advisory Council Meeting	10/16/2024	Spring Valley Lake Community Center 12975 Rolling Ridge Drive Spring Valley Lake, CA 92395
15	Loma Linda Senior Center Resource Event	10/17/2024	25571 Barton Rd. Loma Linda, CA 92354
16	Senior Nutrition Meeting	10/21/2024	Grand Terrace Senior Center 22627 Grand Terrace Rd. Grand Terrace, CA 92313
17	Yucca Valley TAD Lobby Outreach	10/21/2024	56357 Pima Trail Yucca Valley, CA 92284
18	Senior Nutrition Meeting	10/22/2024	Joshua Tree Community Center 6171 Sunburst Ave. Joshua Tree, CA 92252
19	Redlands TAD Lobby Outreach	10/22/2024	1811 W. Lugonia Ave. Redlands, CA 92374
20	Senior Nutrition Meeting	10/23/2024	Twentynine Palms Senior Center 6539 Adobe Rd. Twentynine Palms, CA 92277
21	Barstow TAD Lobby Outreach	10/23/2024	1900 E. Main St. Barstow, CA 92311
22	Senior Nutrition Meeting	10/24/2024	Barstow Senior Citizens Center 555 Melissa Ave. Barstow, CA 92311
23	Adelanto TAD Lobby Outreach	10/24/2024	10875 Rancho Rd. Adelanto, CA 92301
24	Twentynine Palms TAD Lobby Outreach	10/25/2024	73629 Sun Valley Dr. Twentynine Palms, CA 92277
25	Senior Nutrition Meeting	10/28/2024	Big Bear Senior Center 42651 Big Bear Blvd.
26	East Valley Region RSC Meeting	11/21/2024	Joshua Tree Community Center 6171 Sunburst Ave. Joshua Tree, CA 92252

Stakeholder Consultations

San Bernardino County conducted a special stakeholder and service provider survey throughout November 2024. Stakeholders were identified by San Bernardino County staff and represented a variety of viewpoints, including fair housing/legal advocacy, housing, affordable housing, real estate and mortgage lending, community development and planning, transportation, education, homelessness, civic organizations, services for low-income households, people with disabilities, seniors, children, domestic violence victims, and others.

Interview invitations were made to representatives of many community service providers, local government officials, and other relevant organizations, of whom 21 completed the survey. Several invitees participated in other manners, such as attending a public meeting. Organizations from which one or more representatives participated in the development of this Consolidated Plan include:

Stakeholders		
City of Adelanto	City of Yucaipa	San Bernardino County Workforce Development Department
City of Chino	Department of Aging and Adult Services	Symba Center
City of Colton	Housing Authority of the County of San Bernardino	The Children's Fund
City of Highland	NAMI Inland Valley	The Salvation Army of San Bernardino
City of loma Linda	San Bernardino County	Transitional Assistance Department
City of Redlands	San Bernardino County Department of Public Health	San Bernardino County Preschool Services
City of Twentynine Palms		

Community Survey

The third method of obtaining community input was a 24-question survey available to the general public, including residents and other stakeholders. The survey was available online and in hard copy in English, Spanish, and Vietnamese in October and November 2024. Paper copies were available at the public meetings, through local service providers, and at the County Department of Community Development and Housing. A total of 1,674 survey responses were received: 1,672 in English, 1 in Spanish, and 1 in Vietnamese.

Community Engagement Results

Results of the community engagement process are discussed below, including a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report. Note that the comments and perceptions reported here are those of the residents and stakeholders who participated and do not necessarily reflect the views of San Bernardino County or its cooperating cities.

Participant Demographics

- Of the 1,672 people who participated in the survey, 1,670 took the survey in English, 1 in Spanish, and 1 in Vietnamese.
- Survey participants live throughout San Bernardino County in a variety of zip codes – a total of 96 different zip codes were reported by survey participants
- The survey captured responses from a wide variety of age groups, and the most commonly represented groups were ages 34-44 and ages 45-54.
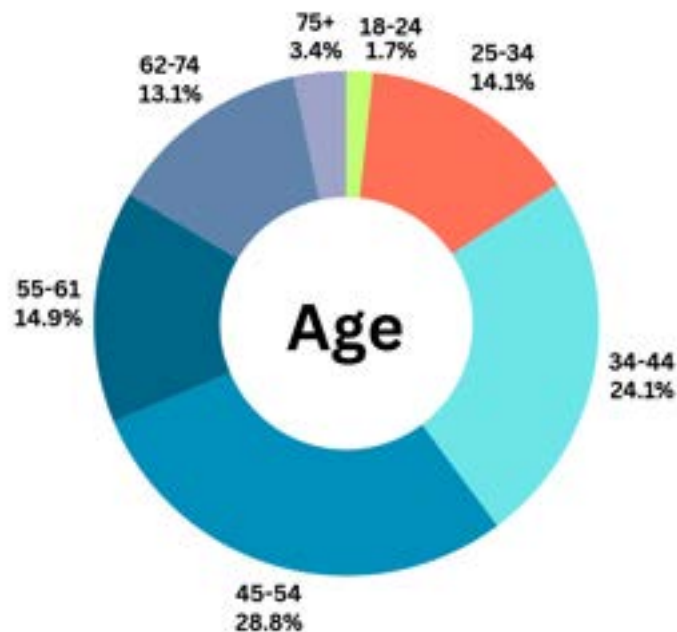
- About 29% of survey takers had household incomes under $50,000 and the other 71% had incomes above $50,000. 8.6% of participants had very low household incomes under $25,000, while 31% had incomes over $100,000; this indicates that survey results may be skewed towards residents with higher than average incomes.

over $100k
31.4%

under $25k
8.6%

$25-$34.9k
6.4%

Household
Income

$35-$49.9k
14%

$75-99.9k
16.1%

$50-74.9k
23.4%
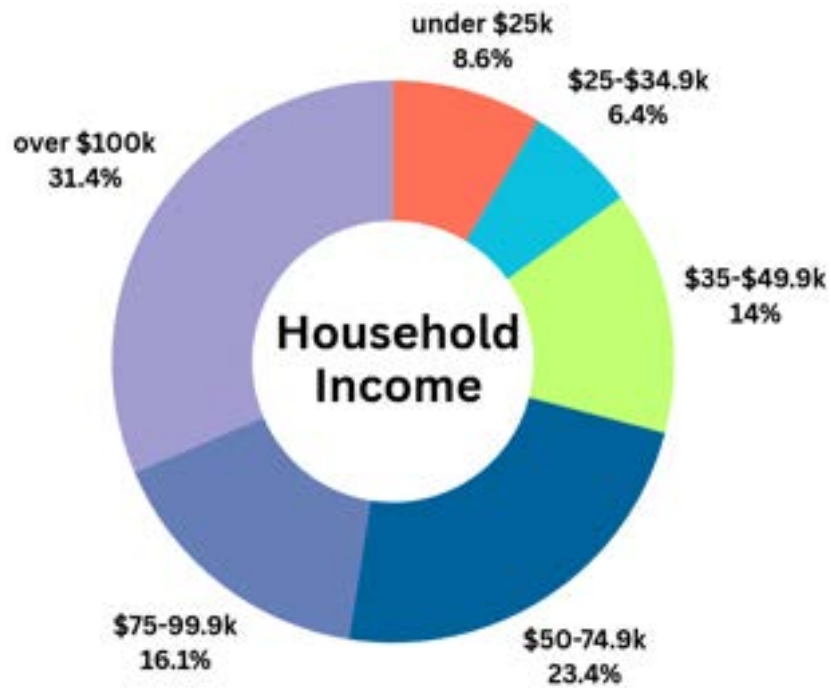
- Survey participants represented a wide variety of races and ethnicities. Hispanic or Latino and white residents were the two largest racial or ethnic groups, each representing over one-third of all respondents. Black residents were the only other racial or ethnic group to comprise more than 5% of all respondents. Other racial and ethnic groups represented included Asian, Native American, Middle Eastern or North African, and Native Hawaiian or other Pacific Islander races, as well as residents who listed their race or ethnicity as "other".

Race/Ethnicity

- 38.3% Hispanic/Latino
- 36.5% White
- 12.7% Black
- 4.6% Asian
- 3.7% Other
- 2.4% Native American
- 0.9% Middle Eastern/North African
- 0.9% Native Hawaiian/Pacific Islander
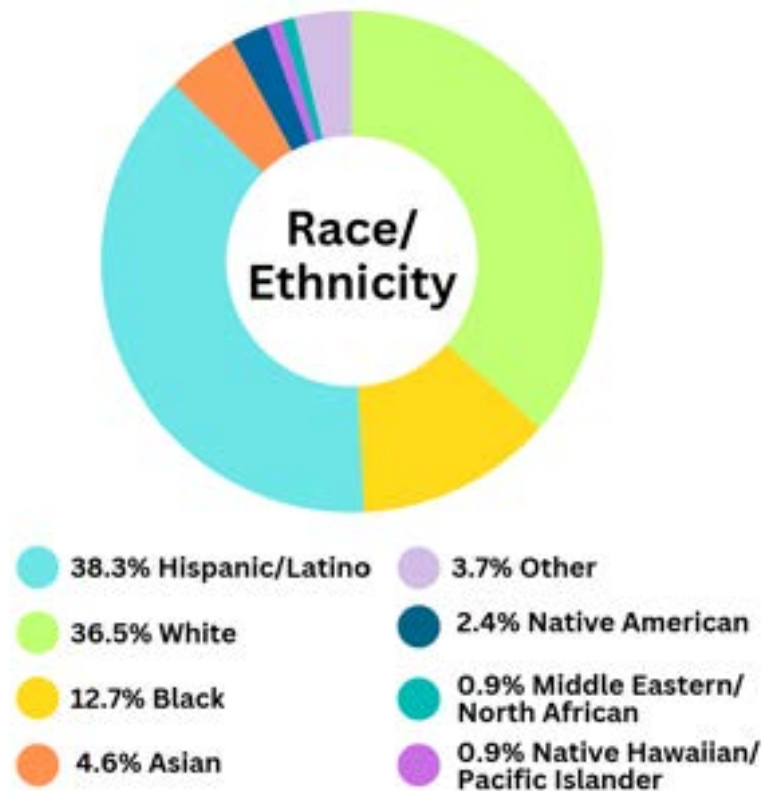
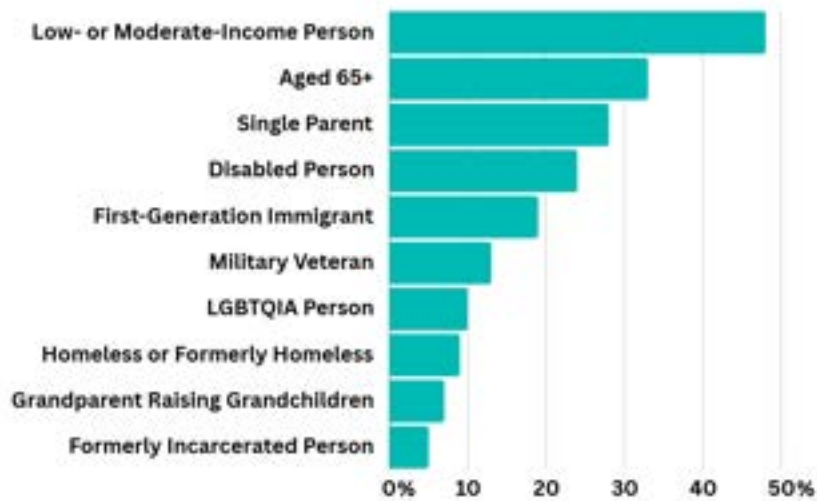- Nearly three-quarters of survey responses came from women. Men represented a little over one-fifth of respondents, while transgender and nonbinary respondents and respondents who declined to answer comprised about 4% of participants.

What is your gender?

74.3% Female
21.7% Male
2.8% Other
0.5% Prefer not to say
0.4% Nonbinary
0.2% Transgender
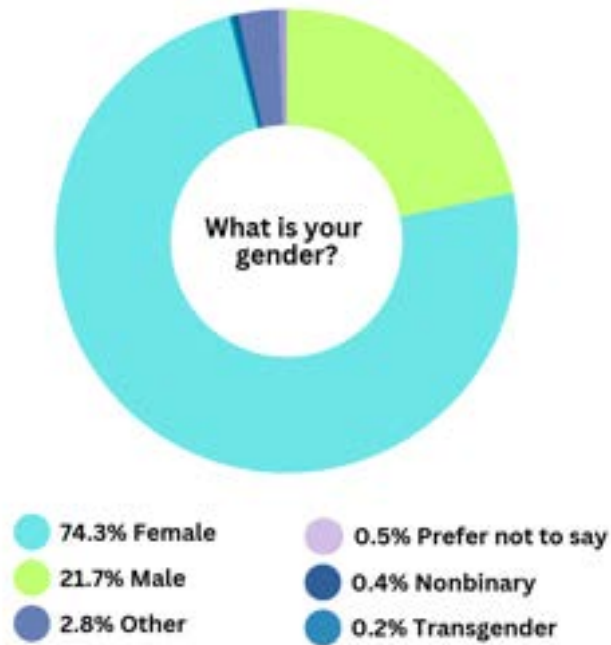
- Survey respondents represented a wide variety of demographics with special equity concerns. The most commonly represented groups, comprising more than 20% each of participants, were households containing low- and moderate-income people, seniors, single parents, and people with disabilities. (Note that one person or household may fit multiple categories.)

Do any of the following describe you or a family member?

Category	Percentage
Low- or Moderate-Income Person	~47%
Aged 65+	~33%
Single Parent	~28%
Disabled Person	~23%
First-Generation Immigrant	~19%
Military Veteran	~12%
LGBTQIA Person	~9%
Homeless or Formerly Homeless	~8%
Grandparent Raising Grandchildren	~6%
Formerly Incarcerated Person	~4%

- Although only two participants completed the survey in a language other than English, one-third of participants reported someone in their household regularly speaking a language other than English.

Does anyone in your household regularly speak a language other than English?

Yes 33.3%

No 66.7%
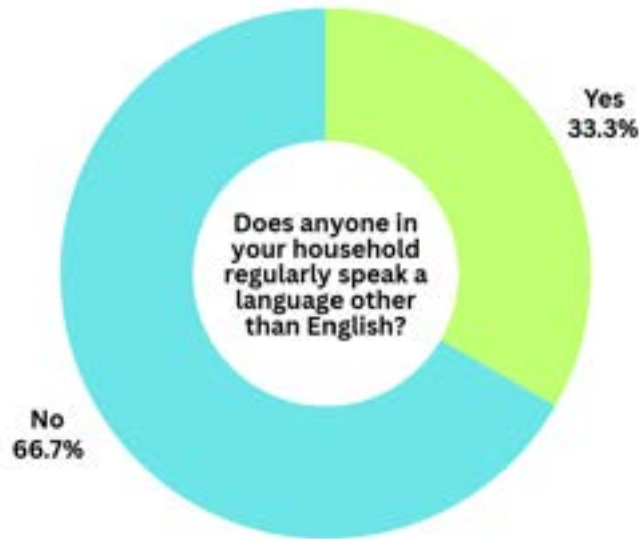
- Over half of all participants own their home, and nearly one-third were renters. Only 2.5% received publicly supported housing assistance.

Housing Status

53.2% Owner
32% Renter
8.3% Living with relatives
2.7% homeless
2.4% Other
0.2% Living in Hotel/Motel

Do you live in public housing or receive Section 8 rental assistance?

Yes 2.5%

No 97.5%
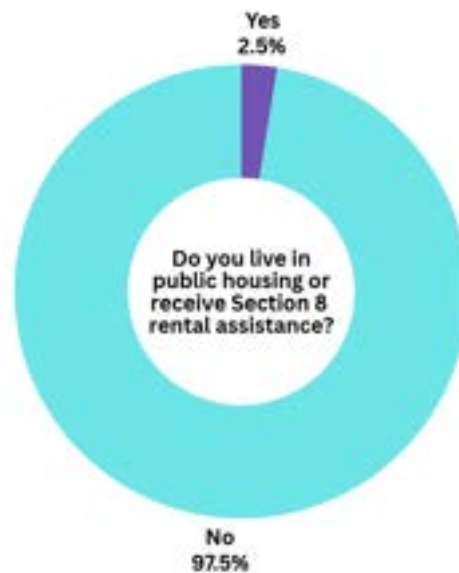
Housing Needs in San Bernardino County

Survey participants were asked to rank San Bernardino County's level need for many different types of housing and related programs. On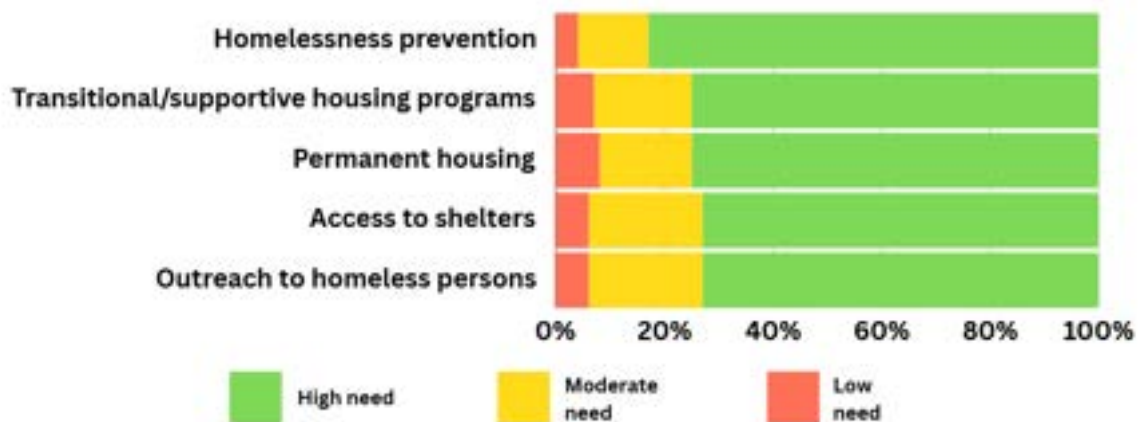ly two of the listed options – help with rental payments and housing that accepts Section 8 – were listed as having less than a high level of need by the majority of participants, indicating a very high level of overall need for expanded housing access within the County. The three most pressing needs as ranked by survey participants were downpayment or other homebuying assistance, grants to improve affordable rental housing, and new construction of affordable rental.

Please rank the following Housing Needs in San Bernardino County on a scale ranging from a low need to a high need.
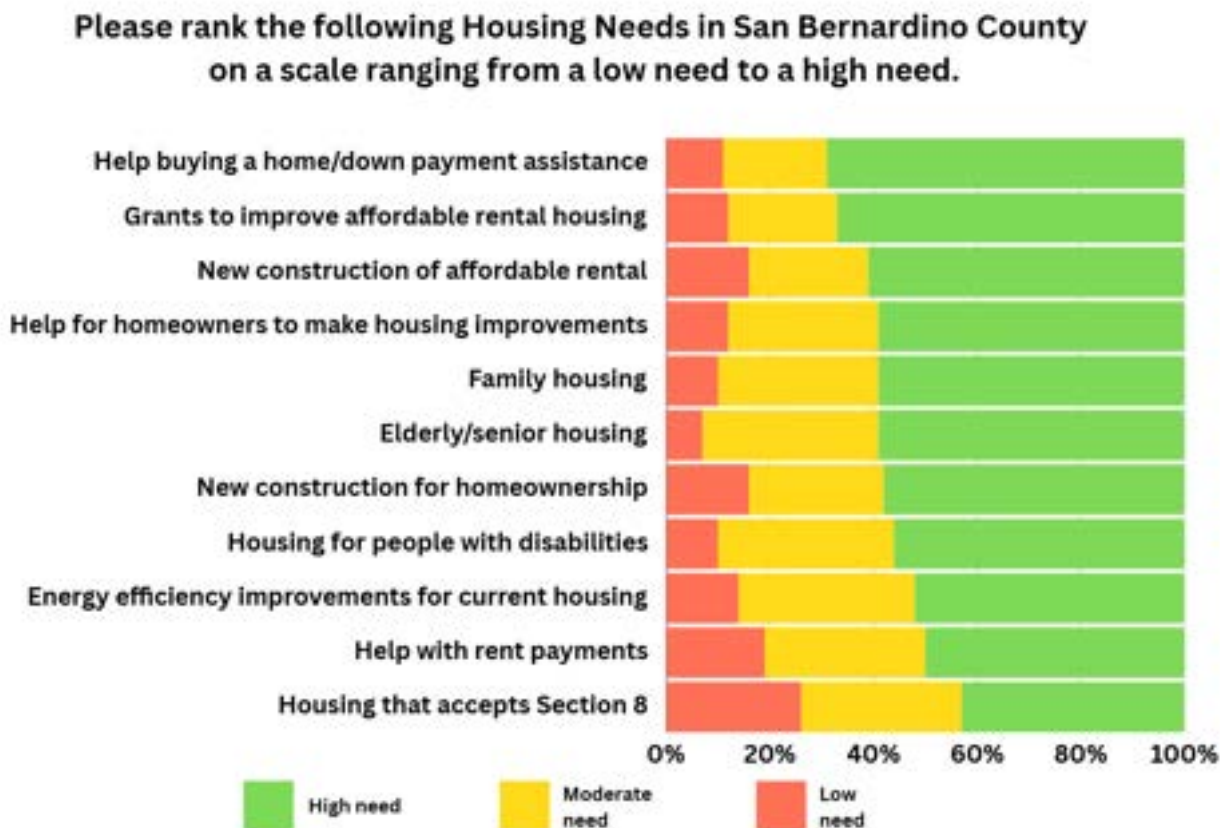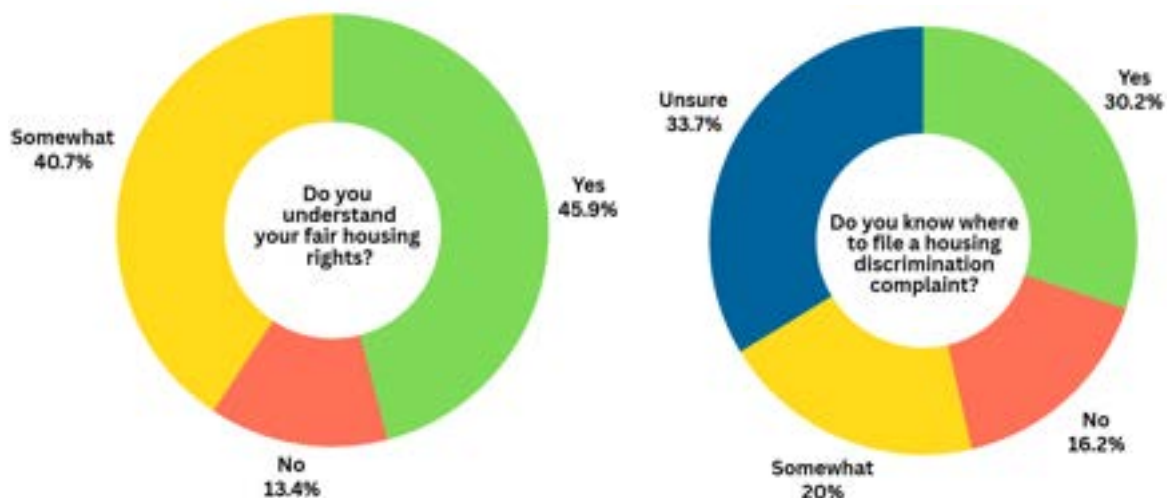

Participants were also asked to rank five types of homelessness needs on a scale of low to high. All five needs were ranked as pressing by a minimum of 73% of participants, with homelessness prevention being viewed as the most pressing need by 83% of participants.

Please rank the following Homeless Needs in San Bernardino County on a scale ranging from a low need to a high need.

Homelessness prevention
Transitional/supportive housing programs
Permanent housing
Access to shelters
Outreach to homeless persons

0%   20%   40%   60%   80%   100%

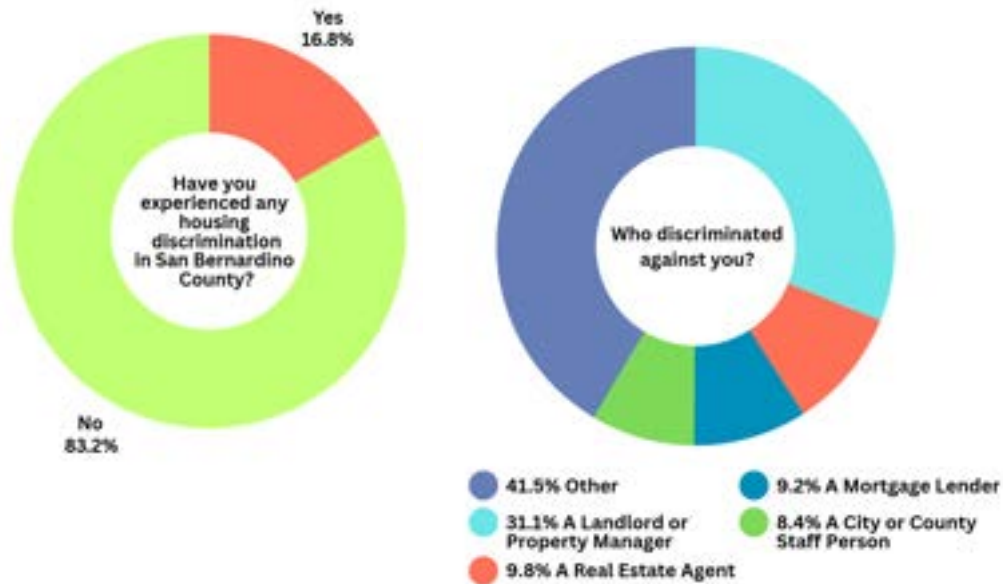High need   Moderate need   Low need
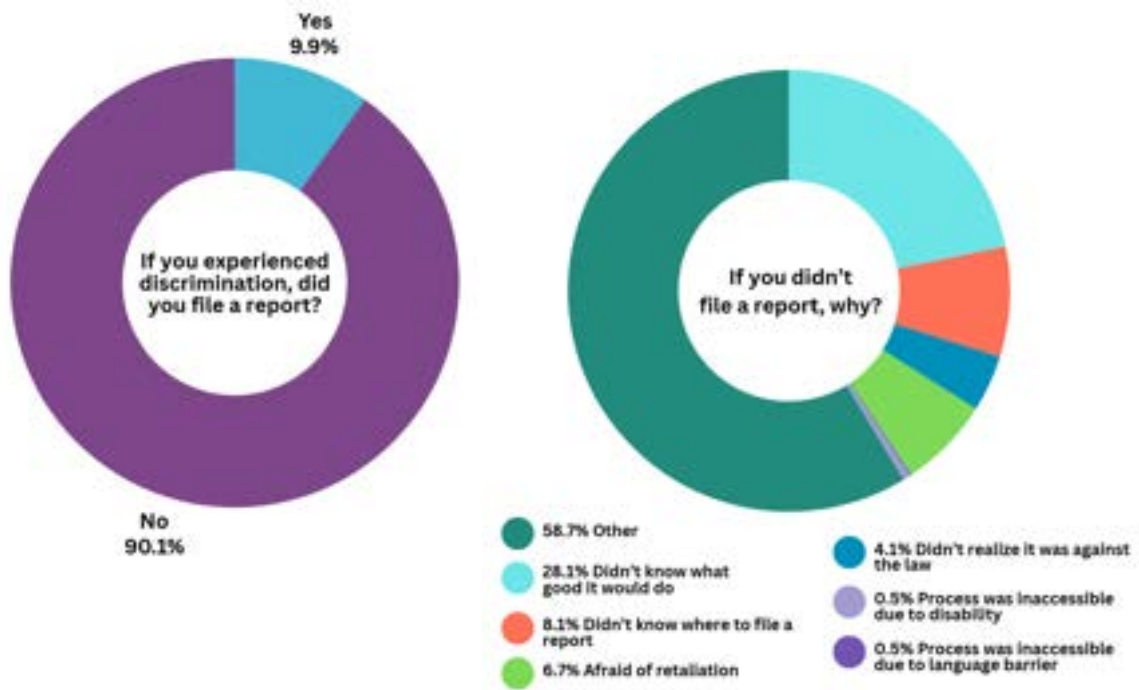
Fair Housing in San Bernardino County

Participants were asked a series of questions about their knowledge of and experience with fair housing access within San Bernardino County. Slightly fewer than half of all participants felt that they fully understood their fair housing rights, and fewer than one-third knew how to file a housing discrimination complaint.

Somewhat 40.7%
Do you understand your fair housing rights?
Yes 45.9%
No 13.4%

Unsure 33.7%
Do you know where to file a housing discrimination complaint?
Yes 30.2%
No 16.2%
Somewhat 20%

Nearly 17% of participants, or 274 people, reported having experienced housing discrimination within the County. Among those who experienced discrimination, the most common perpetrator was a landlord or property manager (41.5% of respondents to this question selected "other", but the vast majority entered "none" or "N/A" when asked to specify, indicating that many participants did not realize they were only supposed to answer this question if they had experienced discrimination). Less commonly, participants experienced discrimination from real estate agents, mortgage lenders, and City or County staff.

Have you experienced any housing discrimination in San Bernardino County?

Yes 16.8%

No 83.2%

Who discriminated against you?

41.5% Other
31.1% A Landlord or Property Manager
9.8% A Real Estate Agent
9.2% A Mortgage Lender
8.4% A City or County Staff Person

Participants who had experienced discrimination were also asked whether they had filed a housing discrimination complaint and what factors may have influenced a decision not to file. Only 27 people, or just under 10% of those who had experienced housing discrimination, had chosen to file a report. The most commonly listed reason for not filing a report was not knowing what good it would do (once again, many participants who had not experienced discrimination answered this question by choosing "other" and entering "N/A"). Other reasons included not knowing how, being afraid of retaliation, not realizing that it was against the law. Additionally, three participants said they were unable to access the reporting process due to a disability, and one participant said they were unable to access the reporting process due to a language barrier.

If you experienced discrimination, did you file a report?
- Yes 9.9%
- No 90.1%

If you didn't file a report, why?
- 58.7% Other
- 28.1% Didn't know what good it would do
- 8.1% Didn't know where to file a report
- 6.7% Afraid of retaliation
- 4.1% Didn't realize it was against the law
- 0.5% Process was inaccessible due to disability
- 0.5% Process was inaccessible due to language barrier

Finally, participants were asked for their thoughts on what factors might contribute to a lack of fair housing access within San Bernardino County. The top five barriers, listed by more than half of participants, were a lack of affordable housing for families, a lack of affordable housing for individuals, displacement due to rising housing costs, a lack of affordable senior housing, and a need for neighborhood revitalization and new investment.

Do you think the following are barriers to fair housing in San Bernardino County?

| Barrier	Yes
Not enough affordable housing for families	78%
Not enough affordable housing for individuals	78%
Displacement of residents due to rising housing costs	70%
Not enough affordable housing for seniors	68%
Neighborhoods that need revitalization and new investment	54%
Discrimination by landlords or rental agents	47%
Community opposition to affordable housing	47%
Limited access to jobs	47%
Lack of housing options for people with disabilities	44%
Limited access to good schools	35%
Landlords refusing to accept Section 8 vouchers	34%
Discrimination by mortgage lenders	29%
Limited access to community resources for people with disabilities	29%
Limited access to banking and financial services	24%
Discrimination or steering by real estate agents	24%
Other	9%

Yes ▮ No ▮

Responses by subgroup

In addition to assessing overall survey response, six minority subgroups were identified within the response pool who, for various reasons, may exhibit more or different housing obstacles than the overall group. These groups are participants who are low- to moderate-income, participants who are extremely low income, participants under age 35, participants who do not own their home, participants in multi-lingual households, and participants with a senior and/or disabled household member. Responses by each subgroup are examined in this section.

Low- to moderate-income and extremely low-income

478 people, or about 28.7% of participants, reported earning less than $50,000 per year; while 142 people, or about 8.6% of participants, reported earning less than $25,000 per year. Thoughts, needs, and demographics from these participants differed from the overall survey responses presented above in several ways. The images below depict demographic differences between these subgroups in comparison to the overall response pool:

19

Age
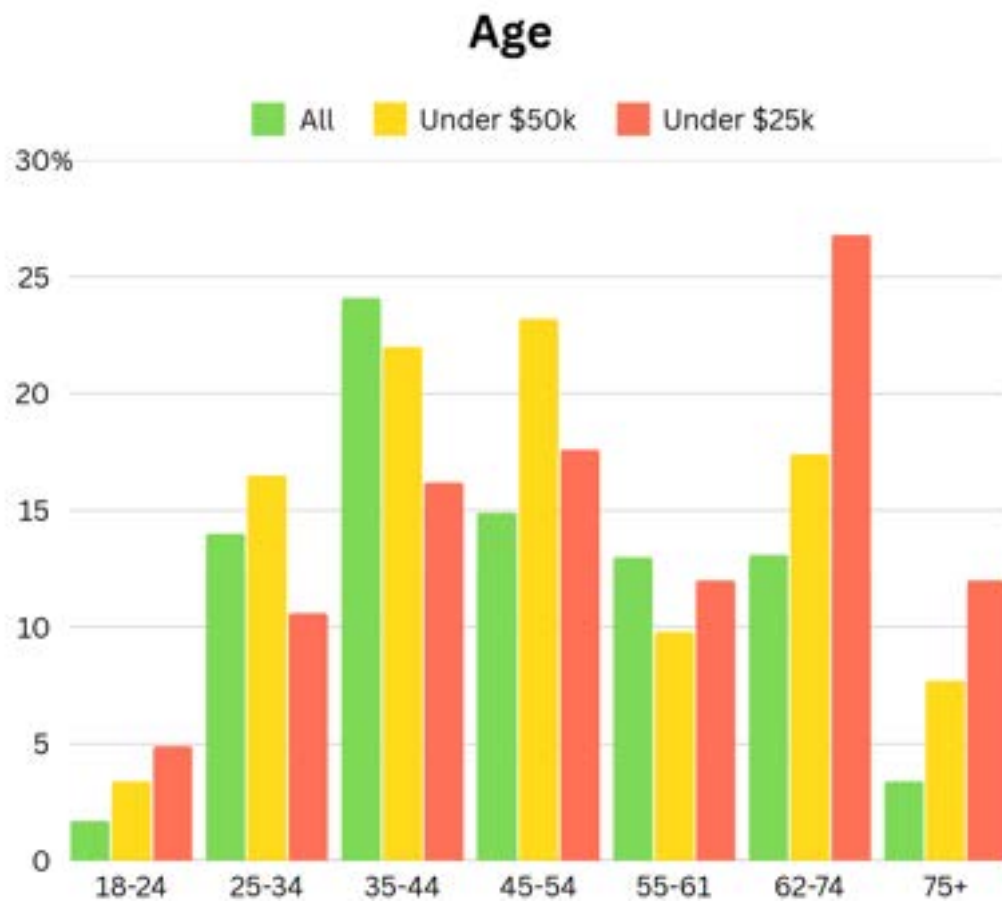
Race/Ethnicity
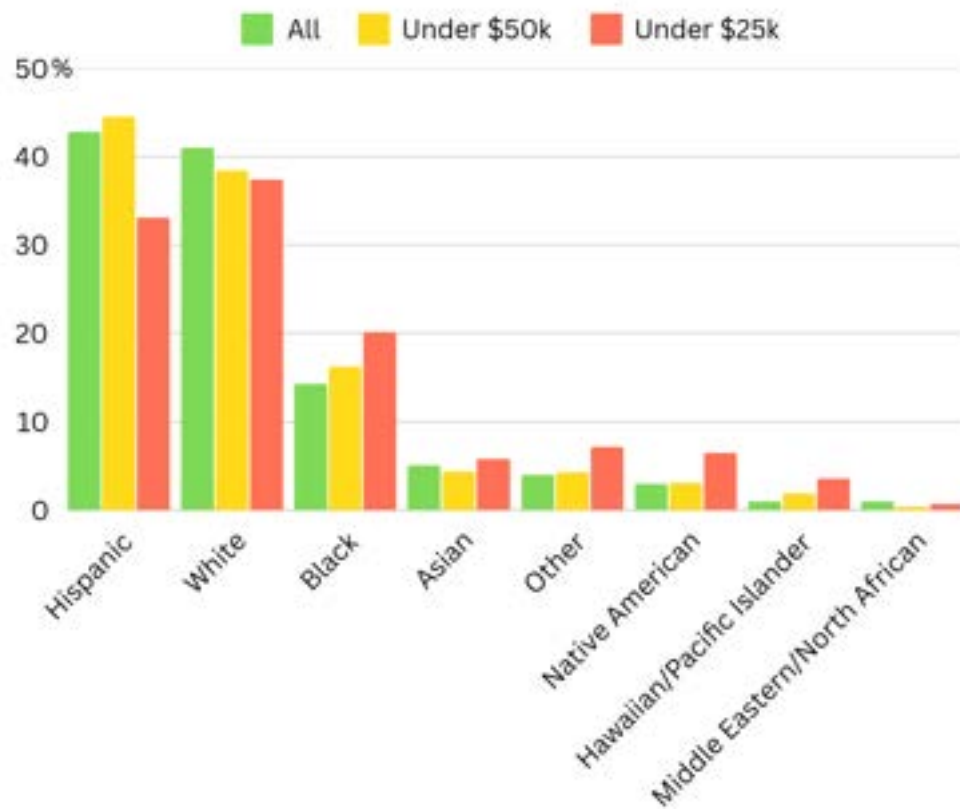
Housing Status
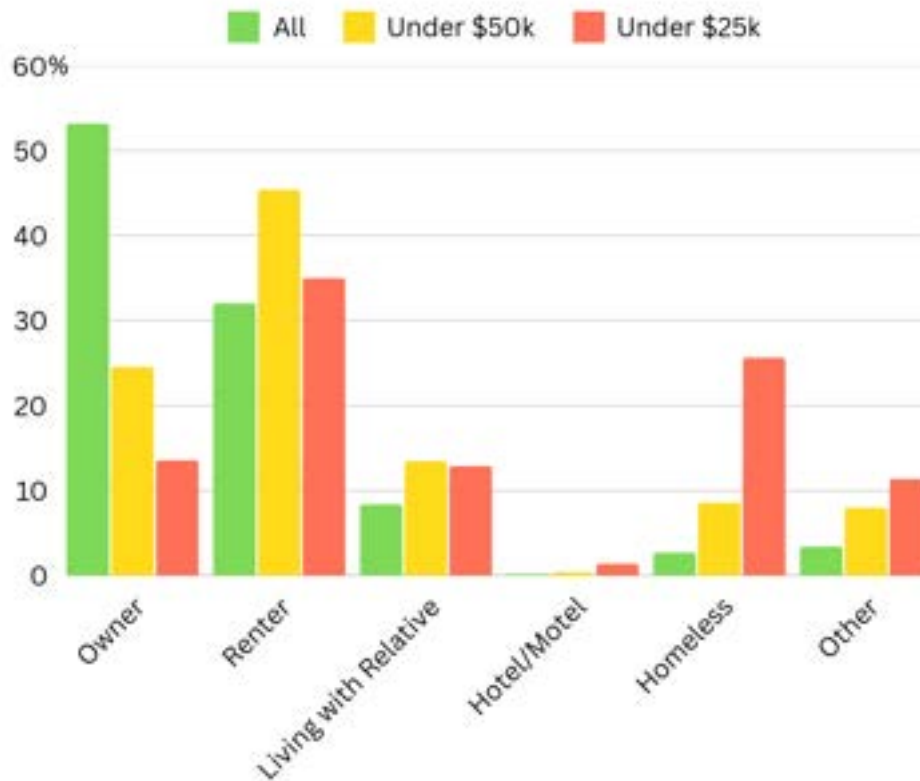
- These participants placed significantly more importance on transportation assistance and food banks than participants as a whole.

- These participants, along with disabled and/or elderly households, were the only subgroups who placed more importance on grants to improve affordable rental than on homebuying assistance.

- These participants placed more importance on a need for housing for people with disabilities than participants as a whole.

- These participants were significantly more likely to have experienced housing discrimination and slightly more likely to have filed a report than participants as a whole.

Under Age 35

261 people, or just under 16% of all survey participants, were under age 35. Thoughts, needs, and demographics from these participants differed from the overall survey responses presented above in the following ways:

- These participants are lower income - nearly half (47.5%) of this group earned between $35,000 and $75,000 per year, in comparison with 37% of participants as a whole. Only 19% earned more than $100,000 per year, in comparison with 31% of participants as a whole. Finally, two-thirds

described themselves as low- or moderate-income, in comparison with just under half of participants as a whole.

- These participants were more likely to have a multi-lingual household – 50% of this group reported at least one non-English speaking household member, in comparison with 33% of participants as a whole.

- These participants are much more likely live with a relative (28%) in comparison to participants as a whole (8%).

- These participants placed a higher emphasis on family housing and a lower emphasis on senior housing than participants as a whole.

- These participants placed greater importance on a lack of jobs as a barrier to fair housing than participants as a whole.

- These participants were significantly less likely to fully understand their fair housing rights and know how to file a complaint than participants as a whole.

Non-Homeowners

771 people, or about 46% of participants, did not own the home they live in. Thoughts, needs, and demographics from these participants differed from the overall survey responses presented above in the following ways:

- These participants are lower income - nearly 16% earn less than $25,000 per year, in comparison with just 8.6% of participants as a whole, while only 12.8% earn more than $100,000 per year, in comparison with nearly one-third of participants as a whole. They are also more likely to describe themselves as a low- or moderate-income person.

- Black, Hispanic, and Native American residents are overrepresented among non-homeowners in comparison to participants as a whole.

- Non-homeowners were more likely to be a single parent than homeowners.

- These participants were more than twice as likely to live with a relative in comparison to participants as a whole.

- These participants placed a greater emphasis on a need for services such as housing counseling and food banks than participants as a whole.

- These participants placed slightly more emphasis on community opposition to affordable housing as a fair housing issue than participants as a whole.

- These participants were more likely to experience housing discrimination than participants as a whole, and less likely to fully understand their fair housing rights or know how to file a complaint.

<u>Multilingual households</u>

552 people, or about 33% of participants, reported having at least one household member who speaks a language other than English (this includes two participants who completed the survey in Spanish and Vietnamese). Thoughts, needs, and demographics from these participants differed from the overall survey responses presented above in the following ways:

- Participants in multilingual households were nearly twice as likely to be Hispanic, Latino, or Asian than participants as a whole.

- These participants were more than twice as likely to be or have a household member who is a first-generation immigrant than participants as a whole.

- These participants placed a higher emphasis on a need for family housing than participants as a whole.

- These participants were slightly more likely to have experienced housing discrimination than participants as a whole, but only one-third as likely to file a report. They were also less likely to fully understand their fair housing rights or to know how to file a fair housing complaint.

<u>Senior and/or disabled households</u>

622 people, or about 37% of participants, reported having at least one household member who was disabled and/or aged 65+. Thoughts, needs, and demographics from these participants differed from the overall survey responses presented above in the following ways:

- These participants were more likely to be extremely low income – earning less than $25,000 per year – than participants as a whole.

- White, Black, and Asian residents were slightly overrepresented in this category in comparison to participants as a whole.

- These participants were about 50% more likely to live with a relative in comparison to participants as a whole.

- This group placed a greater emphasis on a need for senior services than participants as a whole.

- These participants, along with extremely low-income participants, were the only subgroups who placed more importance on grants to improve affordable rental than on homebuying assistance.

- These participants placed more emphasis on a need for more housing options for people with disabilities than participants as a whole.

- These participants were slightly more likely to experience housing discrimination, but less likely to file a report than participants as a whole.

SOCIOECONOMIC PROFILE

San Bernardino County is located within the Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA). The county was home to an estimated 2,180,563 residents as of the 2018-2022 American Community Survey five-year estimates. Residents of San Bernardino County comprise slightly less than half (47.3%) of the MSA's total population (see Table 1). The county's population grew by 6.8% since the 2008-2012 five-year estimates (see Table 2), while the MSA's population grew at a slightly faster rate of 8.9%.

Demographic Profile

Race / Ethnicity

Hispanic or Latino residents are the predominant ethnic group in San Bernardino County, comprising more than half of all residents (55%; see Table 1). White, non-Hispanic residents are the second largest population, making up just over one-fourth of the county's population (25.9%). Black and Asian/Pacific Islander residents each make up about 8% of the population, while people of two or more races comprise 3.1%. Fewer than 1% of residents identify as Native American or 'some other race.' In comparison to the MSA, the county has a slightly smaller share of white residents and larger shares of Hispanic, Black, and Asian/ Pacific Islander residents. Since the 2008-2012 American Community Survey five-year estimates, the share of Hispanic residents in the county has increased, while the share of white, non-Hispanic residents has declined (see Table 2).

National Origin

San Bernardino County is home to an estimated 460,841 foreign-born residents, who make up 21.1% of the county's population. The most common country of birth for foreign-born residents is Mexico, with foreign-born residents from Mexico comprising 11.6% of the county's total population. Populations born in the Philippines, El Salvador, China (excluding Hong Kong and Taiwan), and Guatemala each make up 0.6% to 1.3% of the county's population.

Limited English Proficiency (LEP)

About 15% of residents in the county and MSA have limited English proficiency (LEP), defined as speaking English less than "very well." Spanish is the primary language spoken at home by residents with limited English proficiency in both areas, followed by other Indo-European languages and Asian or Pacific Island languages. LEP Spanish speakers account for 11.7% of the population in both the county and MSA, while LEP speakers of other languages make up about 3% of the county's and MSA's populations.

Disability

About 11% to 12% of the county and MSA populations have at least one disability. The most common disability type in San Bernardino County is ambulatory difficulty (6.1% of the population), followed by independent living difficulty (5.8%), and cognitive difficulty (5.0%). Self-care, vision, and hearing

difficulties are less common, impacting about 2% to 3% of residents. Disability rates by type are similar within the MSA.

Age

Residents aged 20 to 64 make up about 58% to 59% of the county's and MSA's populations, a share that has remained relatively consistent since the 2008-2012 five-year estimates. At the same time, the share of residents under age 20 has declined, while the share of residents aged 65 and over has increased. Residents under age 20 comprise about 28% to 29% of the county and MSA populations, down from about 33% as of the 2008-2012 five-year estimates. Residents aged 65 and over make up about 12% to 14% of the population, up from about 9% as of the 2008-2012 estimates.

Sex

Shares of male and female residents are relatively even across both the county and MSA. As of the 2018-2022 American Community Survey five-year estimates, male residents comprised 50.2% of the county's and MSA's populations, while female residents made up 49.8% of the populations.

Family Type

Households with one or more people under age 18 comprise about 39% to 41% of households in the county and MSA. Married couples with children make up 23.4% of households in the county, and married couples without children comprise 28.6% of households. Single female householders without children and single male householders without children make up 18.8% and 13.9% of county households, respectively. Unmarried couples with children and single householders with children make up smaller shares of households.

28.3% of households in the county have at least one member aged 65 or older, and an estimated 4.9% of all households are householders aged 65 and over living alone. Relative to the MSA, San Bernardino County has higher shares of single female and male householders without children. Since the 2008-2012 American Community Survey, the share of families with children has dropped from 45.6% to 40.6%.

TABLE 1.
Demographic Overview

Demographic Indicator	San Bernardino County			Riverside-San Bernardino-Ontario, CA MSA		
		#	%		#	%
RACE / ETHNICITY						
Non-Hispanic		**980,416**	**45.0%**		**2,176,626**	**47.2%**
White		563,779	25.9%		1,351,862	29.3%
Black		163,402	7.5%		311,474	6.8%
Asian or Pacific Islander		170,280	7.8%		338,648	7.4%
Native American		6,234	0.3%		13,691	0.3%
Two or More Races		68,421	3.1%		144,047	3.1%
Other		8,300	0.4%		16,904	0.4%
Hispanic or Latino		**1,200,147**	**55.0%**		**2,433,424**	**52.8%**
Total Population		2,180,563	100%		4,610,050	100%
NATIONAL ORIGIN						
#1 Country of Origin	Mexico	252,069	11.6%	Mexico	559,381	12.1%
#2 Country of Origin	Philippines	28,872	1.3%	Philippines	67,100	1.5%
#3 Country of Origin	El Salvador	21,008	1.0%	El Salvador	35,010	0.8%
#4 Country of Origin	China (excl. Hong Kong and Taiwan)	20,878	1.0%	China (excl. Hong Kong and Taiwan)	33,854	0.7%
#5 Country of Origin	Guatemala	12,018	0.6%	Guatemala	26,827	0.6%

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Demographic Indicator	San Bernardino County			Riverside-San Bernardino-Ontario, CA MSA		
		#	%		#	%
Total Foreign-Born Population		460,841	21.1%		986,815	21.4%
LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGE						
#1 LEP Language	Spanish	237,418	11.7%	Spanish	505,776	11.7%
#2 LEP Language	Asian and Pacific Island Languages	50,873	2.5%	Asian and Pacific Island Languages	91,780	2.1%
#3 LEP Language	Other Indo-European Languages	7,283	0.4%	Other Indo-European Languages	19,751	0.5%
#4 LEP Language	Other Languages	6,700	0.3%	Other Languages	12,633	0.3%
Total LEP Population		302,274	14.8%		629,940	14.6%
DISABILITY TYPE						
Hearing Difficulty		63,994	3.0%		142,521	3.1%
Vision Difficulty		50,520	2.4%		105,810	2.3%
Cognitive Difficulty		98,920	5.0%		203,811	4.8%
Ambulatory Difficulty		121,198	6.1%		262,675	6.2%
Self-Care Difficulty		55,121	2.8%		117,774	2.8%
Independent Living Difficulty		90,876	5.8%		197,256	5.8%
Total Population with a Disability		243,952	11.4%		523,698	11.5%
SEX						

Demographic Indicator	San Bernardino County			Riverside-San Bernardino-Ontario, CA MSA		
		#	%		#	%
Male		1,094,825	50.2%		2,315,218	50.2%
Female		1,085,738	49.8%		2,294,832	49.8%
AGE						
Under 20		627,548	28.7%		1,295,390	28.1%
20 to 64		1,293,088	59.3%		2,695,571	58.4%
65+		259,927	11.9%		619,089	13.5%
HOUSEHOLD TYPE						
Married Couple, Children		154,320	23.4%		330,616	23.4%
Unmarried Couple, Children		23,439	3.6%		44,036	3.1%
Single Female Householder, Children		39,542	6.0%		76,748	5.4%
Single Male Householder, Children		11,038	1.7%		20,453	1.5%
Total Households with One or More People Under 18 Years		267,781	40.6%		550,050	39.0%
Married Couple, No Children		188,951	28.6%		423,406	30.0%
Unmarried Couple, No Children		27,057	4.1%		56,449	4.0%
Single Female Householder, No Children		123,894	18.8%		145,684	10.3%

Demographic Indicator	San Bernardino County			Riverside-San Bernardino-Ontario, CA MSA		
		#	%		#	%
Single Male Householder, No Children		91,687	13.9%		124,917	8.9%
Total Households with No People Under 18 Years		392,147	59.4%		859,854	61.0%
Households with One or More Members Aged 65+		186,530	28.3%		437,328	31.0%
Person Aged 65+ Living Alone		32,652	4.9%		79,715	5.7%
TOTAL HOUSEHOLDS		659,928	100%		1,409,904	100%

Data Source: 2018-2022 American Community Survey 5-Year Estimates, Tables DP05, S1810, S0101, B05006, S1601, DP02.

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

<p style="text-align: center;">TABLE 2.
Demographic Trends</p>

Demographic Indicator	2008-2012		2018-2022	
	#	%	#	%
San Bernardino County Population	2,041,029	100%	2,180,563	100%
Race / Ethnicity				
White	677,104	33.2%	563,779	25.9%
Black	169,394	8.3%	163,402	7.5%
Asian or Pacific Islander	132,813	6.5%	170,280	7.8%
Native American	7,702	0.4%	6,234	0.3%
Two or More Races	43,782	2.1%	68,421	3.1%
Other	4,376	0.2%	8,300	0.4%
Hispanic or Latino	1,005,858	49.3%	1,200,147	55.0%
National Origin				
Foreign-Born	434,383	21.3%	460,841	21.1%
LEP				
Limited English Proficiency	321,777	17.1%	302,274	14.8%
Sex				
Male	1,014,499	49.8%	1,094,825	50.2%
Female	1,025,530	50.2%	1,085,738	49.8%
Age				
Under 20	663,334	32.5%	627,548	28.7%
20 to 64	1,194,002	58.5%	1,293,088	59.3%
65+	185,734	9.1%	259,927	11.9%
Household Type				
Households with One or More People Under 18 Years	273,212	45.6%	267,781	40.6%

Data Source: 2018-2022 American Community Survey 5-Year Estimates, Tables DP05, S0101, B05006, S1601, DP02.

NOTE: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families. Limited English Proficiency is assessed for the population aged 5 years and older.

Racially and Ethnically Concentrated Areas of Poverty

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

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

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

As of the 2018 to 2022 American Community Survey, seven census tracts in San Bernardino County are considered R/ECAPs—tract 57.01 in San Bernardino, tract 91.32 in Adelanto; tract 97.27 in Apple Valley; tract 100.33 in Hesperia; tract 122.02, east of Chino Hills; tract 123, north of Highland, and tract 9801, southwest of Highland around the San Bernardino International Airport.[5] These are the only seven census tracts in the county with poverty rates of 40% or more. Poverty rates in the county's R/ECAPs range from 42.7% to 100%.

While non-Hispanic Black residents comprise just 7.5% of the county's population, these residents make up 19.6% of the population across the seven R/ECAP census tracts. Native American residents and residents of multiple races are also slightly overrepresented in R/ECAPs, while Hispanic, white, and Asian/ Pacific Islander residents are underrepresented in these census tracts.

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[5] While the tract around the airport technically fits the definition of a R/ECAP, the 2018-2022 American Community Survey estimated the population in the tract at only one person.

FIGURE 1. Racially and Ethnically Concentrated Areas of Poverty, San Bernardino County, 2018 to 2022
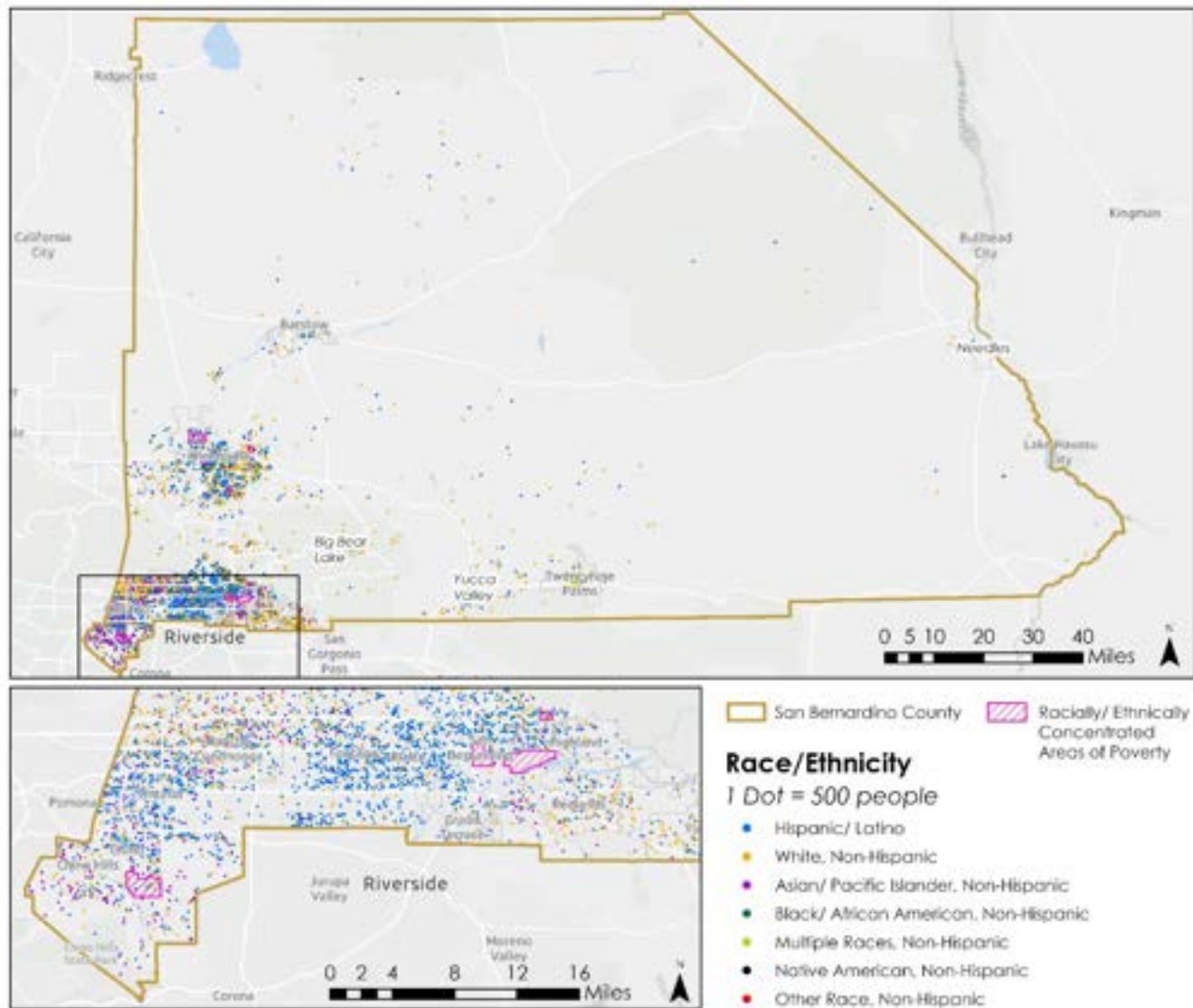
Data Source: 2018-2022 American Community Survey five-year estimates

FIGURE 2.
Racially and Ethnically Concentrated Areas of Poverty, San Bernardino County, 2018 to 2022
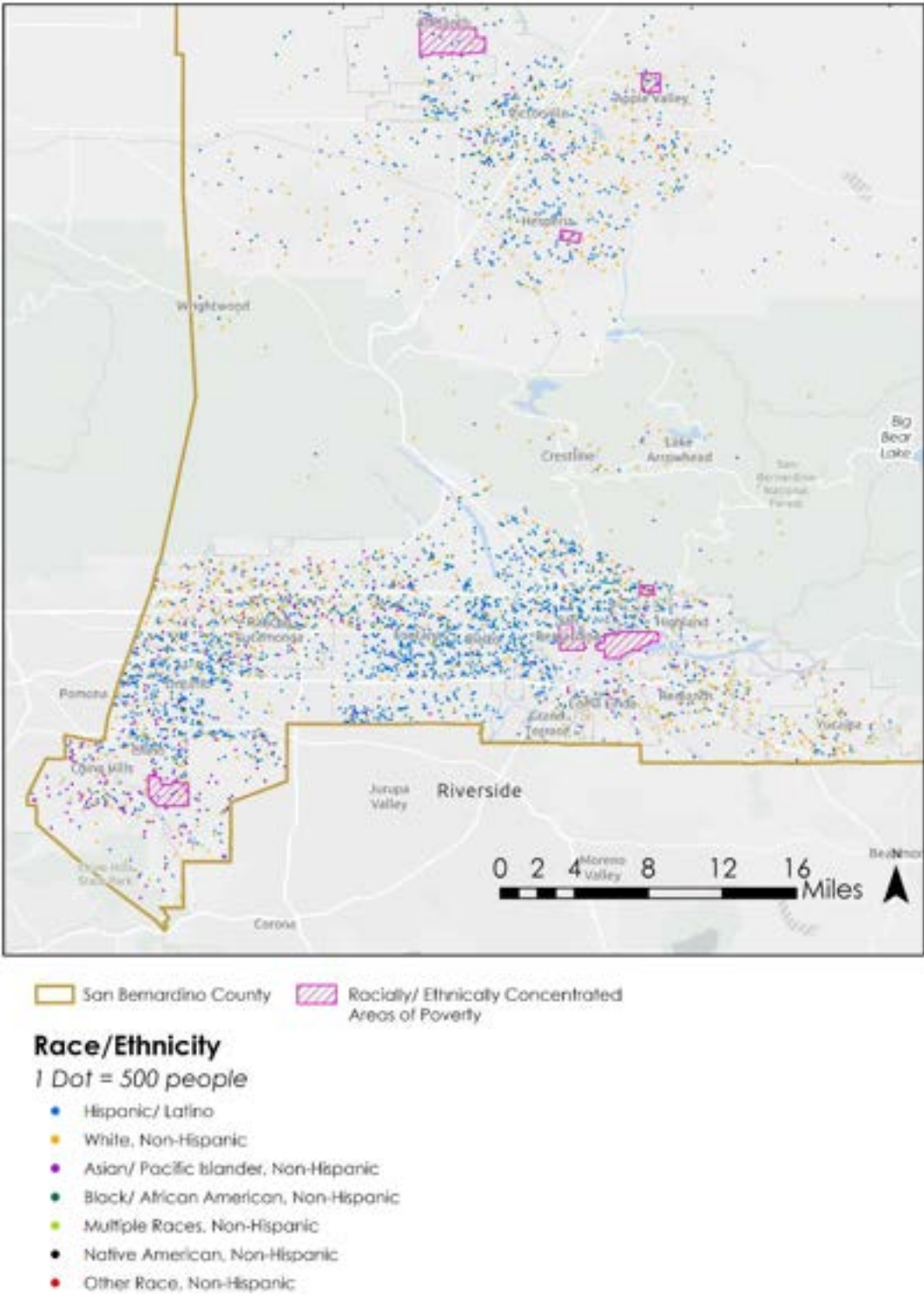
Data Source: 2018-2022 American Community Survey five-year estimates

Segregation and Integration

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

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

Race and Ethnicity

Hispanic or Latino residents made up more than half (55.0%) of San Bernardino County's population as of the 2018-2022 American Community Survey five-year estimates. White, Asian or Pacific Islander, and Black or African American residents make up the next most populous groups, comprising 25.9%, 7.8%, and 7.5% of the county's population, respectively. All other races and ethnicities each make up about 3% or less of the population.

The maps in Figure 3 through Figure 5 illustrate patterns of segregation and integration by race and ethnicity in San Bernardino County from 2000 through 2018-2022. The population is clustered in southwest San Bernardino County in municipalities including Chino Hills, Grand Terrace, Highland, Rancho Cucamonga, Redlands, and others. Another heavily populated area is located north of these municipalities around Victorville, Hesperia, and Apple Valley. North of the Victorville area, there is a smaller population cluster around the city of Barstow. Other areas with population clusters include Big Bear Lake, Needles, Twentynine Palms, and Yucca Valley.

These maps highlight the increase in population density in southwest San Bernardino County over time, as well as the increase in Hispanic or Latino residents as a share of the county's population, from 39.2% of residents in 2000 to 55.0% in 2018-2022. Over the same time period, the county experienced a decline in white, non-Hispanic residents as a share of the population, from 44.0% in 2000 to 25.9% in 2018-2022.

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

Hispanic or Latino residents are relatively dispersed across the heavily populated areas of the county. White residents are also dispersed across populated municipalities, with clustering of the population around Redlands, Rancho Cucamonga, Yucaipa, Apple Valley, and east of Big Bear Lake. Asian residents are most clustered around Chino Hills, Rancho Cucamonga, and the surrounding areas, while Black residents are relatively dispersed throughout southwest San Bernardino County, with clusters of residents in Adelanto and Victorville. Other population groups are also relatively dispersed across the heavily populated areas of southwest San Bernardino County.

FIGURE 3. Population by Race and Ethnicity in San Bernardino County, 2018 to 2022
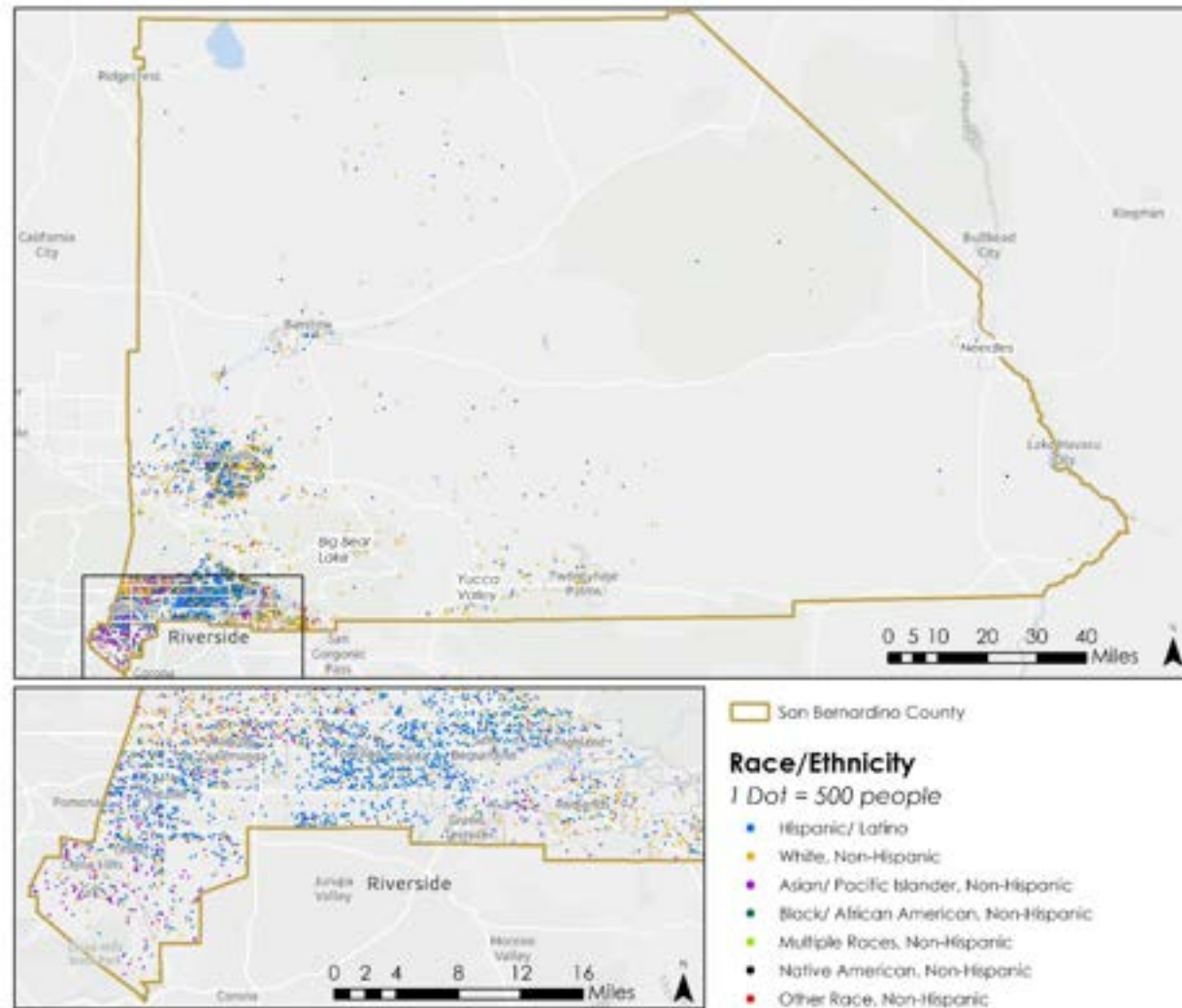
Data Source: 2018-2022 American Community Survey five-year estimates

FIGURE 4. Population by Race and Ethnicity in San Berardino County, 2010
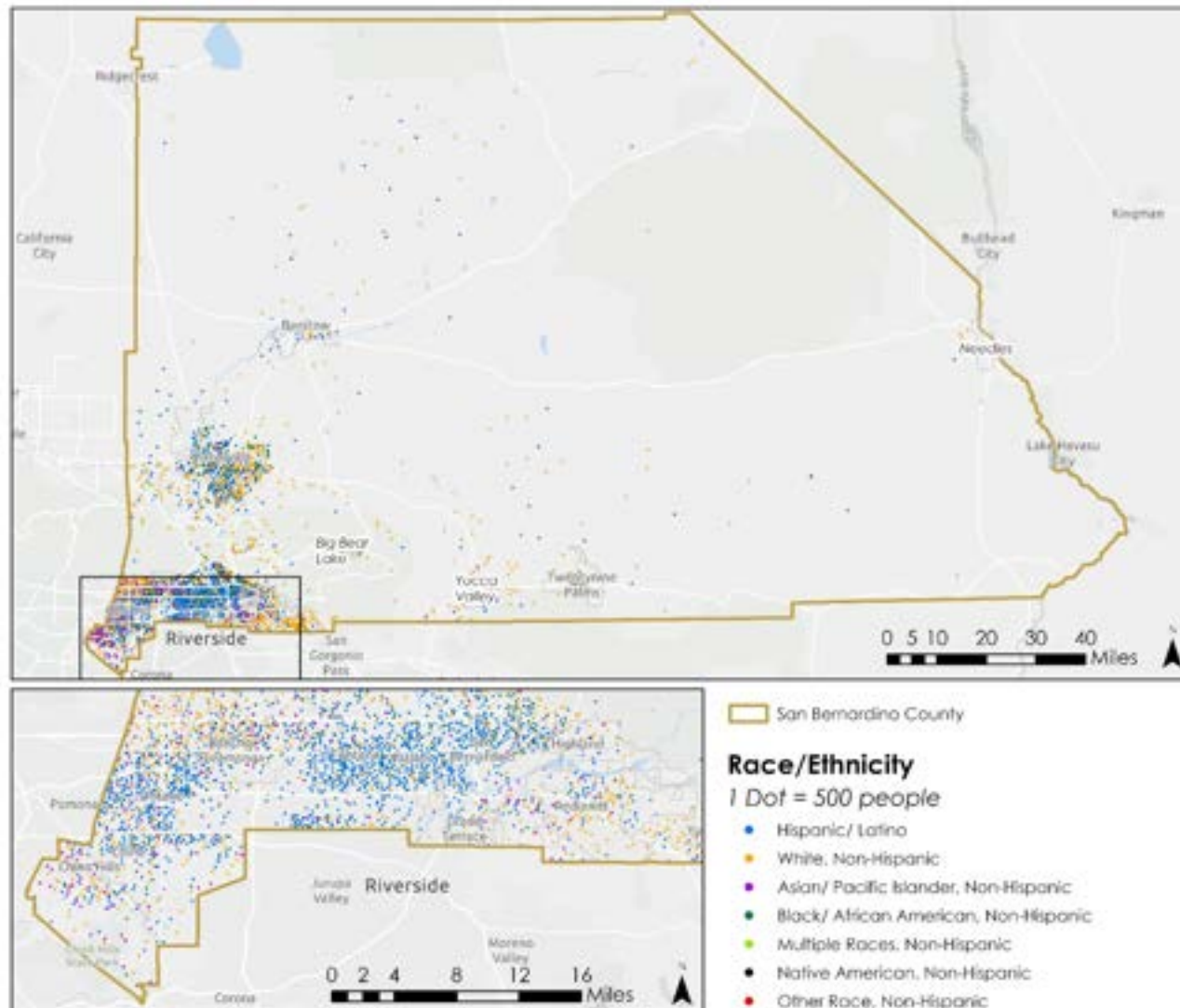
Data Source: 2010 Decennial Census

FIGURE 5. Population by Race and Ethnicity in San Berardino County, 2000
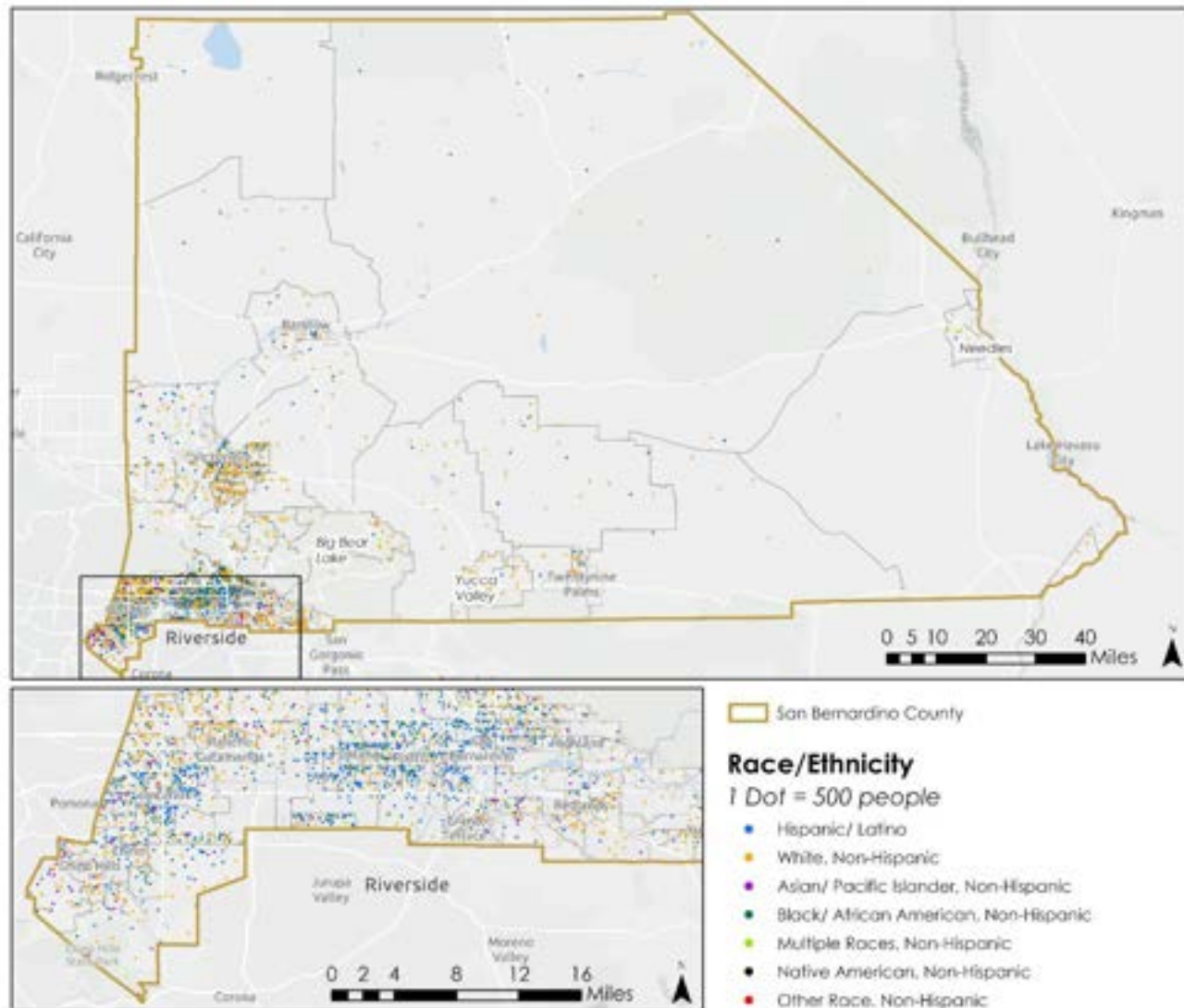
Segregation Levels

In addition to visualizing racial and ethnic compositions of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology uses a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to match the distribution of the majority, or vice versa.

Table 3 shows the dissimilarity indices for three pairings in San Bernardino County. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The Dissimilarity Indices calculated for each pairing in San Bernardino County show increases in segregation levels among all population pairings from 1990 to 2000 and again from 2000 to 2010. In 1990, segregation among all pairings was low, with the exception of that among Black and white residents, which was considered moderate. By 2000 and again in 2010, the most recent year for which HUD data is available, there was moderate segregation among all non-white racial and ethnic groups and white residents in San Bernardino County (see Table 3).

RACE/ ETHNICITY	1990	2000	2010
Non-white/ White	36.4	43.2	46.1
Black / White	45.3	47.6	50.0
Hispanic / White	39.9	47.8	49.8
Asian or Pacific Islander / White	38.3	41.2	41.3

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

National Origin and Limited English Proficiency Population

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

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

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

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

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

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

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

An estimated 460,841 residents of San Bernardino County (21.1% of the county's population) were foreign-born as of the 2018-2022 American Community Survey five-year estimates. The most prevalent national origins of foreign-born county residents are Mexico (252,069 residents, or 11.6% of the county's total population), the Philippines (28,872 residents, or 1.3%), El Salvador (21,008 residents, or 1.0%), China (excluding Hong Kong and Taiwan; 20,878 residents, or 1.0%), and Guatemala (12,018 residents, or 0.6%). Like the county's total population, foreign-born residents are clustered in the municipalities in southwest San Bernardino County as well as in Victorville, Hesperia, and surrounding areas (see Figure 6).

An estimated 302,274 residents in San Bernardino County (14.8% of the county's population) have limited English proficiency (LEP) as of the 2018-2022 American Community Survey five-year estimates. More than three-fourths (78.5%) of LEP residents speak Spanish at home, and about one in six (16.8%) speak Asian or Pacific Island languages. An estimated 2.4% of LEP residents speak other Indo-European languages, and 2.2% speak other languages. LEP residents are also clustered in the municipalities in southwest San Bernardino County as well as in Victorville, Hesperia, and surrounding areas (see Figure 7).

FIGURE 6. Place of Birth for Foreign Born Population (Top 5 Most Populous), San Bernardino County, 2018 to 2022
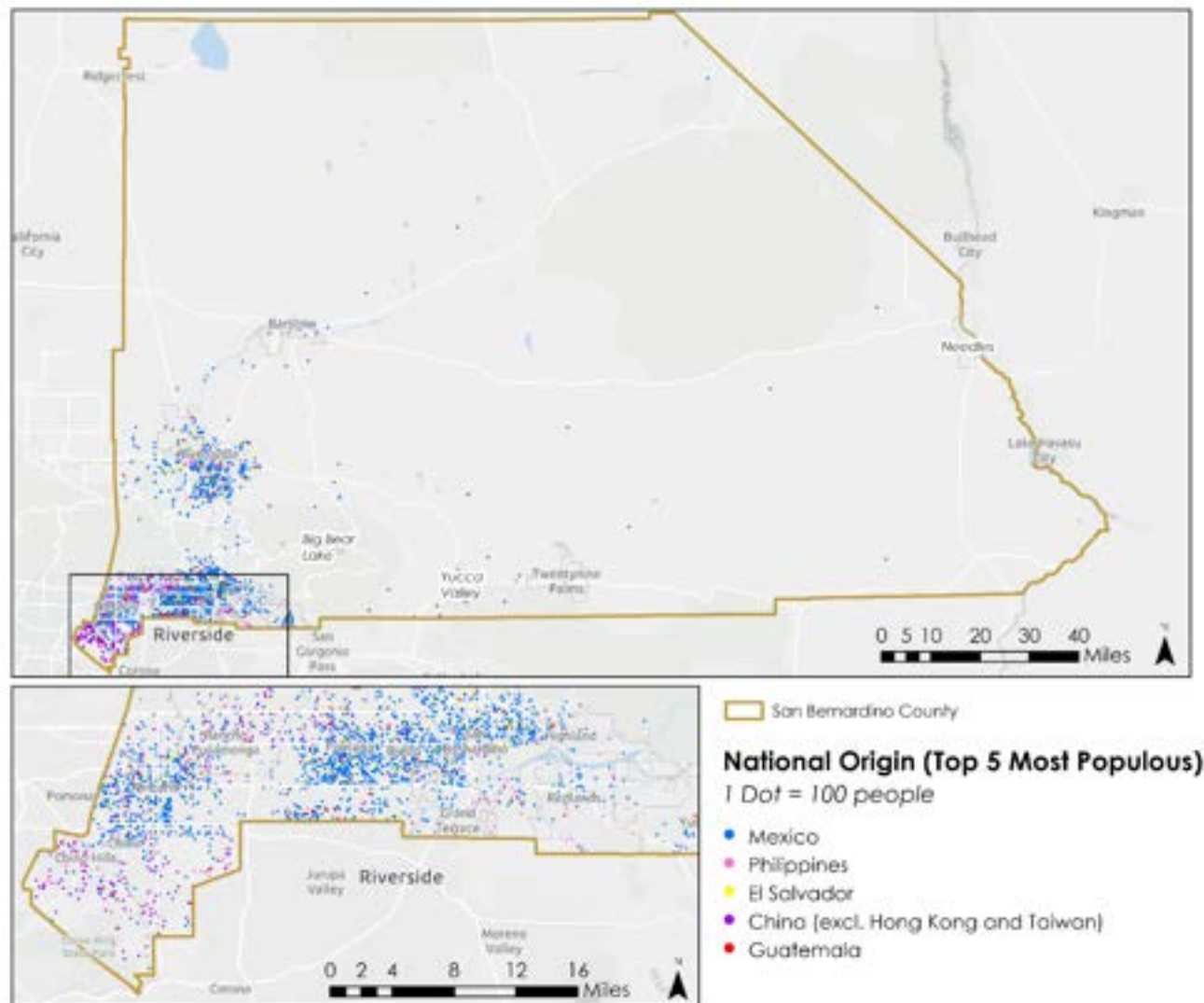
Data Source: 2018-2022 American Community Survey five-year estimates

FIGURE 7. Population with Limited English Proficiency in San Bernardino County, 2018 to 2022
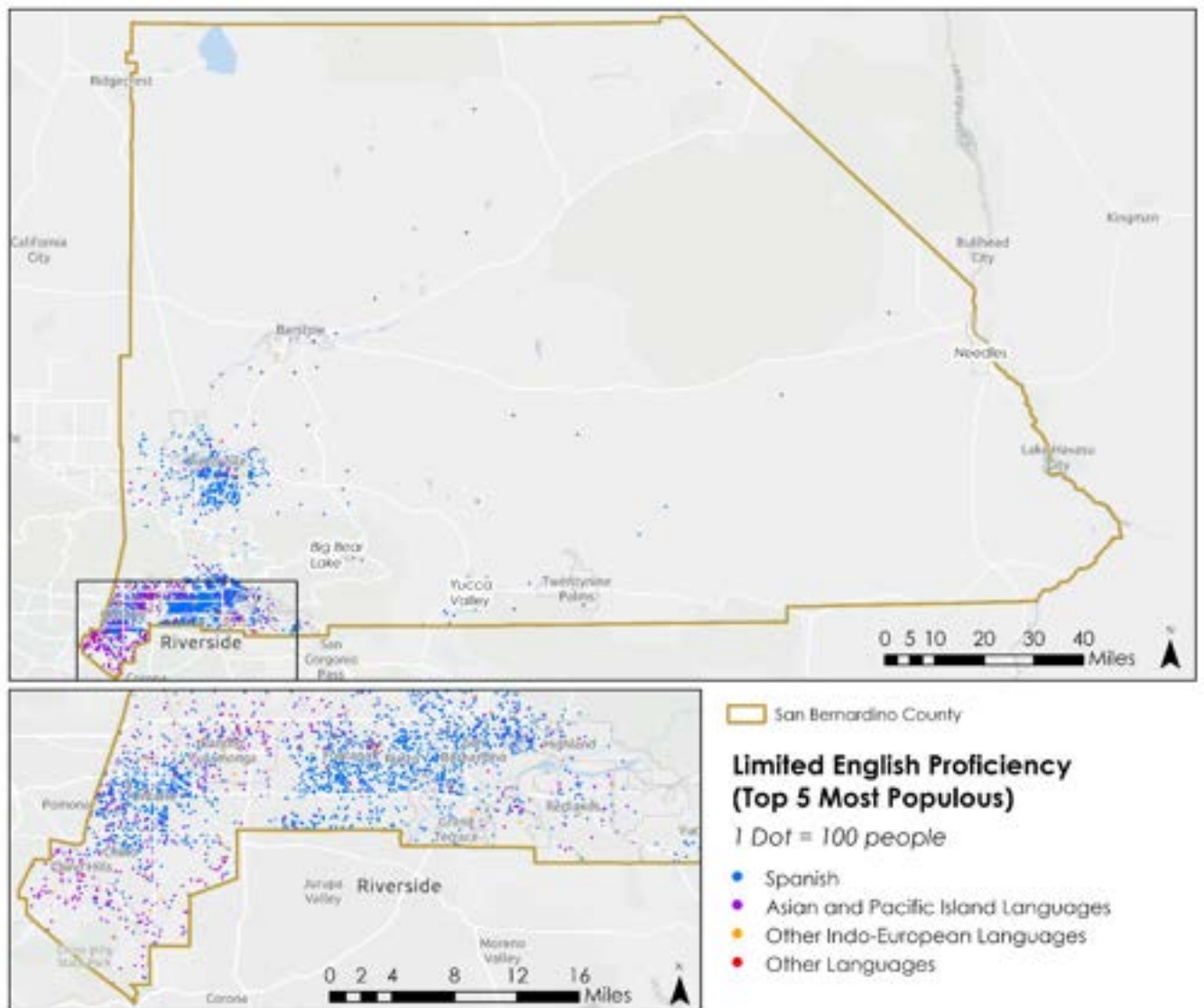
Data Source: 2018-2022 American Community Survey five-year estimates

ACCESS TO OPPORTUNITY

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

The strategy to improve access to opportunity through housing and community development programs has been two-pronged. Programs such as tenant-based housing vouchers provide recipients with mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in low- or moderate-income neighborhoods. The following sections detail access to opportunity in San Bernardino County, including employment and workforce development, education, transportation, low-poverty neighborhoods, environmental quality, fresh food, and healthcare.

Employment and Workforce Development

Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors—transportation options, the types of jobs available in the area, or the education and training necessary to obtain them—may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. Labor market engagement and jobs proximity, when considered together, often offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In San Bernardino County, 22.4% of residents aged 25 and over hold a bachelor's degree or higher, a lower share than that of the Riverside-San Bernardino-Ontario metropolitan area (23.3%) and the state of California overall (35.9%). Geographic disparities in educational attainment exist, with the percentage of residents with bachelor's degrees or higher ranging from 5% to more than 60% across the county's census tracts. Residents of parts of south San Bernardino County, such as the cities of Chino Hills and Redlands, tend to have the highest levels of educational attainment where more than 60% of residents aged 25 and over have a bachelor's degree or higher. Educational attainment tends to be lowest in parts of east and central San Bernardino County, including census tracts in and around Barstow and Victorville, (see Figure 8). The majority of tracts in San Bernardino county, contain between 6-20% of residents aged 25 and over with a bachelor's degree or higher.

FIGURE 8.
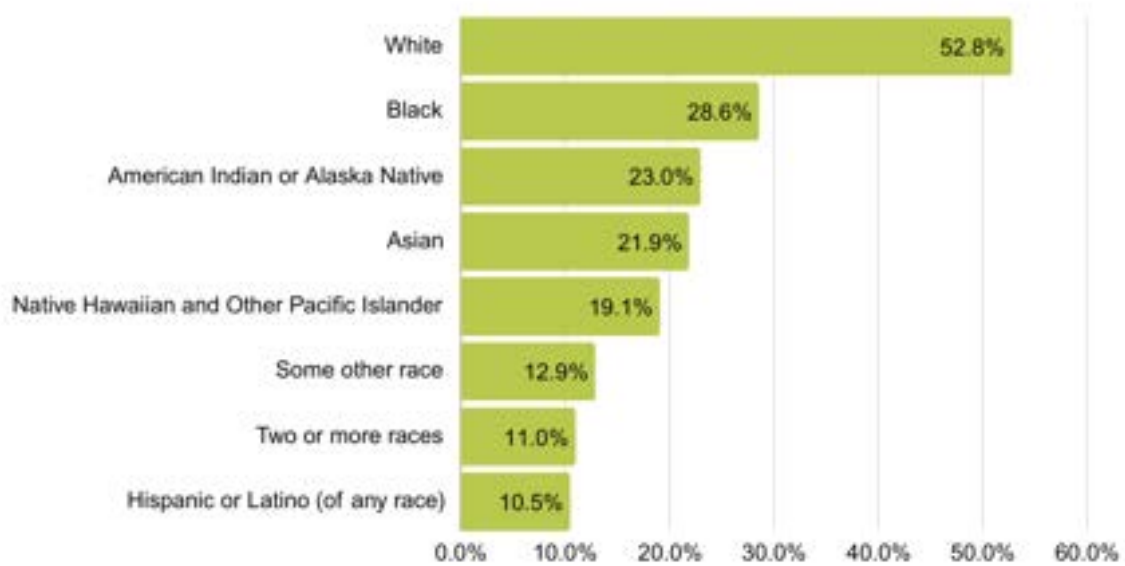Educational Attainment, San Bernardino County, 2018-2022
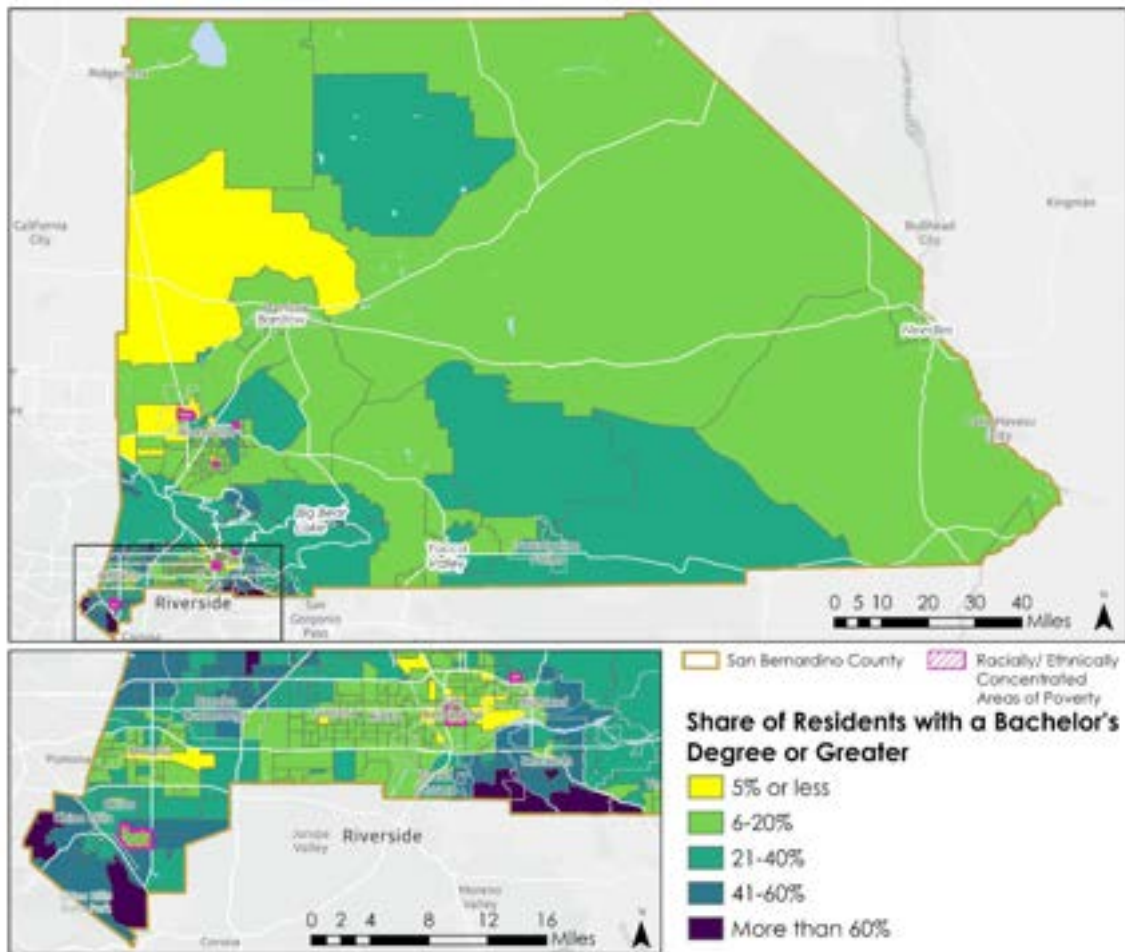
Disparities in educational attainment also exist by race and ethnicity in the county. White residents tend to have higher levels of educational attainment (an estimated 52.8% have a bachelor's degree or higher), while residents of two or more races and Hispanic or Latino residents are least likely to have higher levels of education (11.0% and 10.5% have a bachelor's degree or higher, respectively (see Figure 9).

Figure 9.

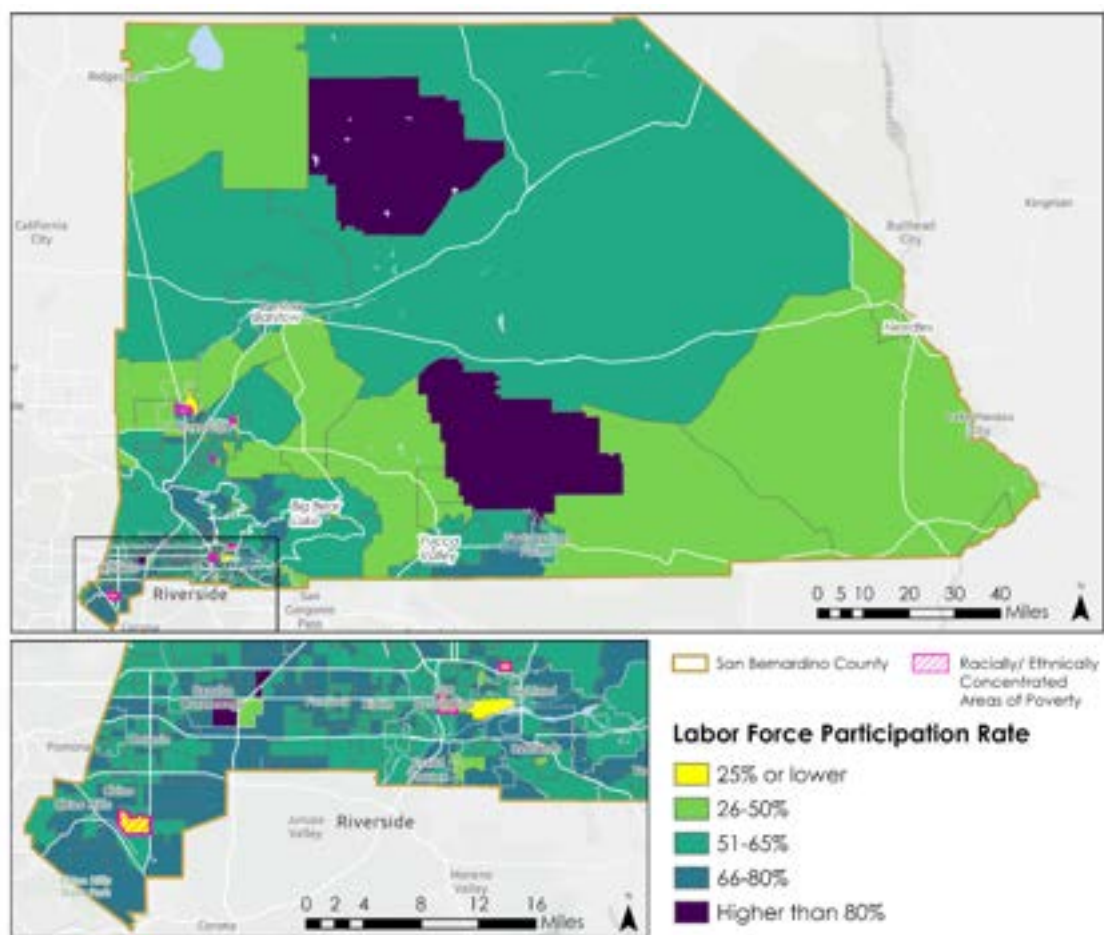Educational Attainment by Race/Ethnicity, San Bernardino County, 2018-2022

Source: American Community Survey 5-Year Estimates, 2018-2022, Table S1501

An estimated 62.1% of the population aged 16 and over in San Bernardino County participates in the labor force, a slightly higher share than that of the Riverside-San Bernardino-Ontario metropolitan area (61.4%) but lower than that of the state of California overall (63.8%). As with educational attainment, geographic disparities exist, with labor force participation rates ranging from lower than 25% to higher than 80% in census tracts across the county. Census tracts with low labor force participation rates are clustered in and around the cities of Victorville, San Bernardino, and Chino Hills. Two tracts contain the highest rates of labor force participation, more than 80%, and are located in the lower south and far north central tracts in the county. Overall, the majority of tracts in the county contain labor force participation rates between 65-80%, (see Figure 10).

FIGURE 10.
Labor Force Participation Rate, San Bernardino County, 2018-2022

Labor force participation is highest among White residents and Black or African American residents, 65.9% and 65.6% of whom participate in the labor force, respectively, and lowest among Hispanic or Latino residents, 56.4% of whom participate (see Figure 11).

49

Figure 11.

Labor Force Participation by Race/Ethnicity, San Bernardino County, 2018-2022

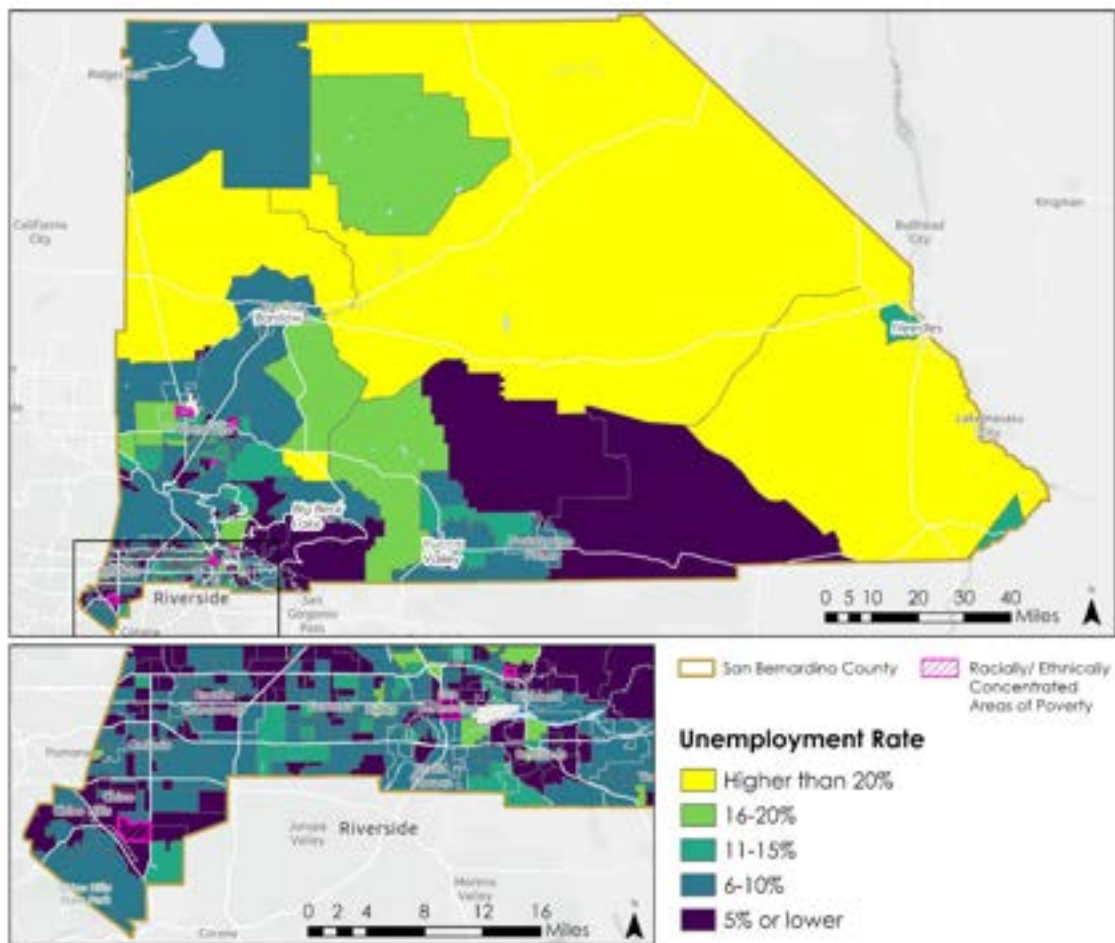Labor Force Participation Rate for Population Aged 16+
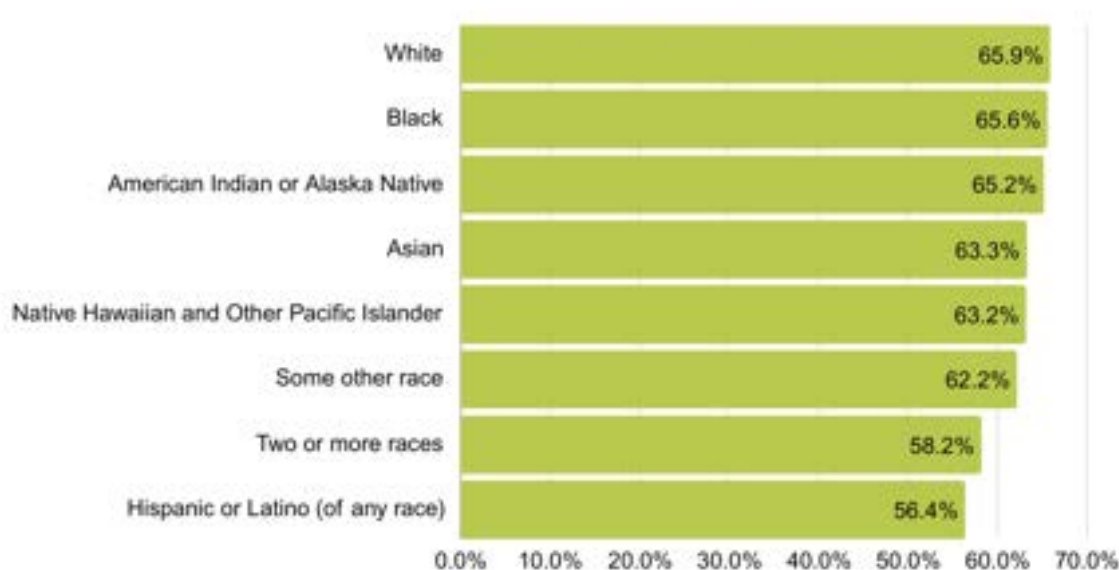
Source: American Community Survey 5-Year Estimates, 2018-2022, Table S2301

An estimated 7.2% of San Bernardino County residents were unemployed as of the 2018 to 2022 ACS five-year estimates, a higher rate than that of the Riverside-San Bernardino-Ontario metropolitan area (6.9%) and the state of California overall (6.4%). More recent data from the Bureau of Labor Statistics[11] shows the unemployment rate in the Riverside-San Bernardino-Ontario MSA at 5.4% as of September 2024, slightly lower than the 2018-2022 estimates. As with educational attainment and labor force participation, unemployment varies by area, ranging from higher than 20% to 5% or lower in census tracts across the county. Unemployment is highest in central and east San Bernardino County, particularly to the east of

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[11] Bureau of Labor Statistics, Economy at a Glance. Retrieved from: https://www.bls.gov/eag/eag.ca_riverside_msa.htm

Barstow, (see Figure 12). The tracts with the lowest rates of unemployment are mostly concentrated in the southern cities of the county, including, Chino Hills, Redlands, Highland, and San Bernardino.

FIGURE 12.
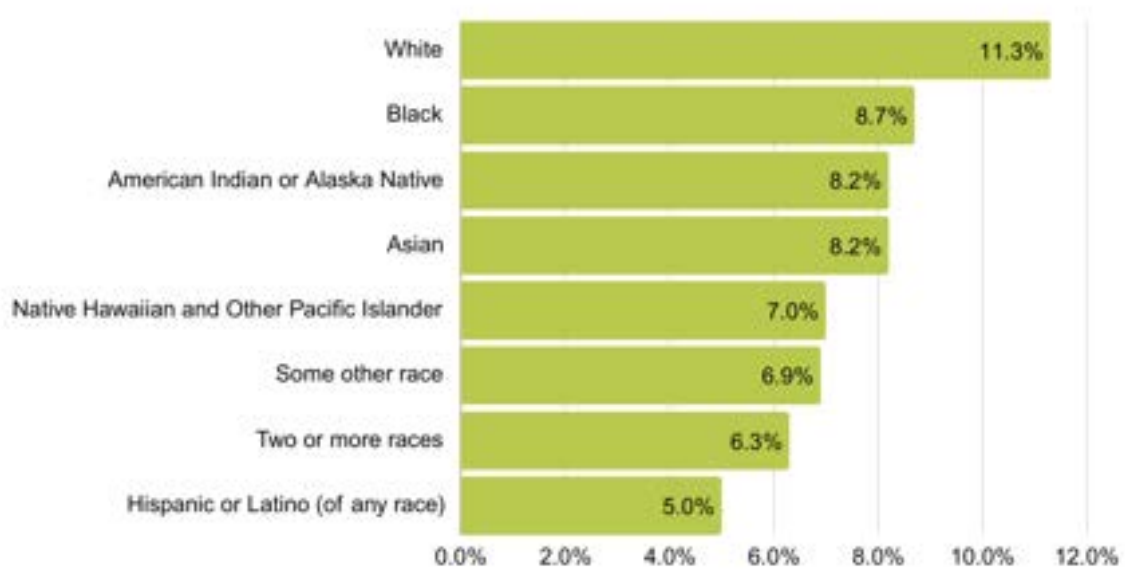Unemployment Rate, San Bernardino County, 2018-2022

The unemployment rate is highest among white residents (11.3%) and lowest among residents of two or more races and Hispanic or Latino residents (6.3%, and 5.0%, respectively; see Figure 13).

Figure 13.

Unemployment Rate for Population Aged 16+ by Race/Ethnicity, San Bernardino County, 2018-2022

Unemployment Rate by Race

Race	Unemployment Rate
White	11.3%
Black	8.7%
American Indian or Alaska Native	8.2%
Asian	8.2%
Native Hawaiian and Other Pacific Islander	7.0%
Some other race	6.9%
Two or more races	6.3%
Hispanic or Latino (of any race)	5.0%

Source: American Community Survey 5-Year Estimates, 2018-2022, Table S2301

Household income is another indicator of access to employment and jobs that pay living wages. The median household income in San Bernardino County was $77,423 as of the 2018-2022 American Community Survey five-year estimates, lower than that of both the Riverside-San Bernardino-Ontario metropolitan area and the state of California overall ($81,041 and $91,905, respectively). Median household incomes are lowest in the southeast tracts of the county, where they fall below $50,000 or less. Median incomes are highest in the southwest tracts of the county where in cities such as near Chino Hills and Highland the median income tops more than $150,000, (see Figure 14).
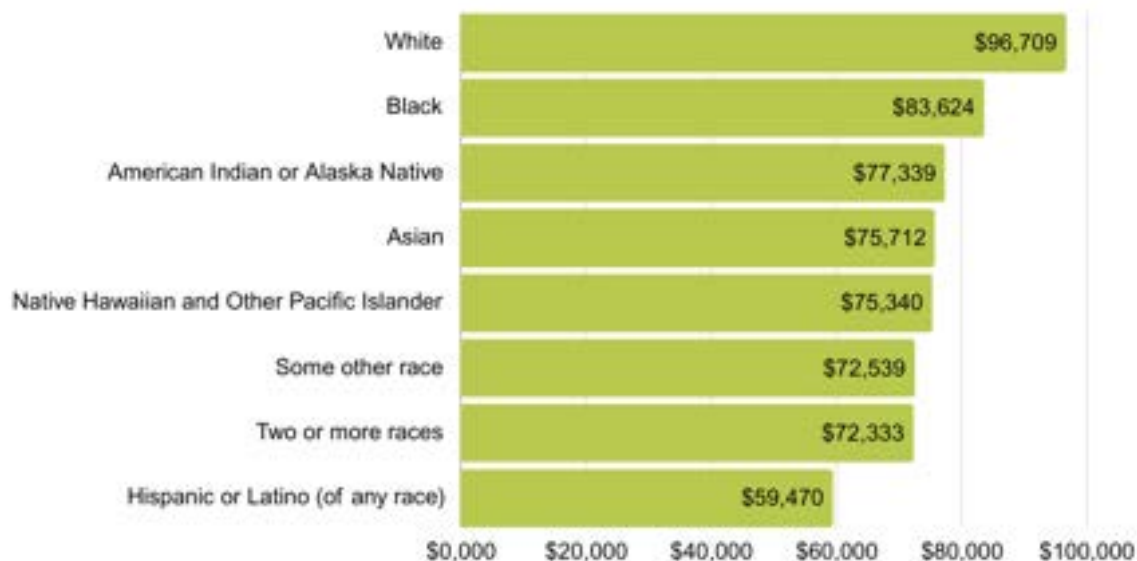
FIGURE 14.
Median Household Income, San Bernardino, 2018-2022
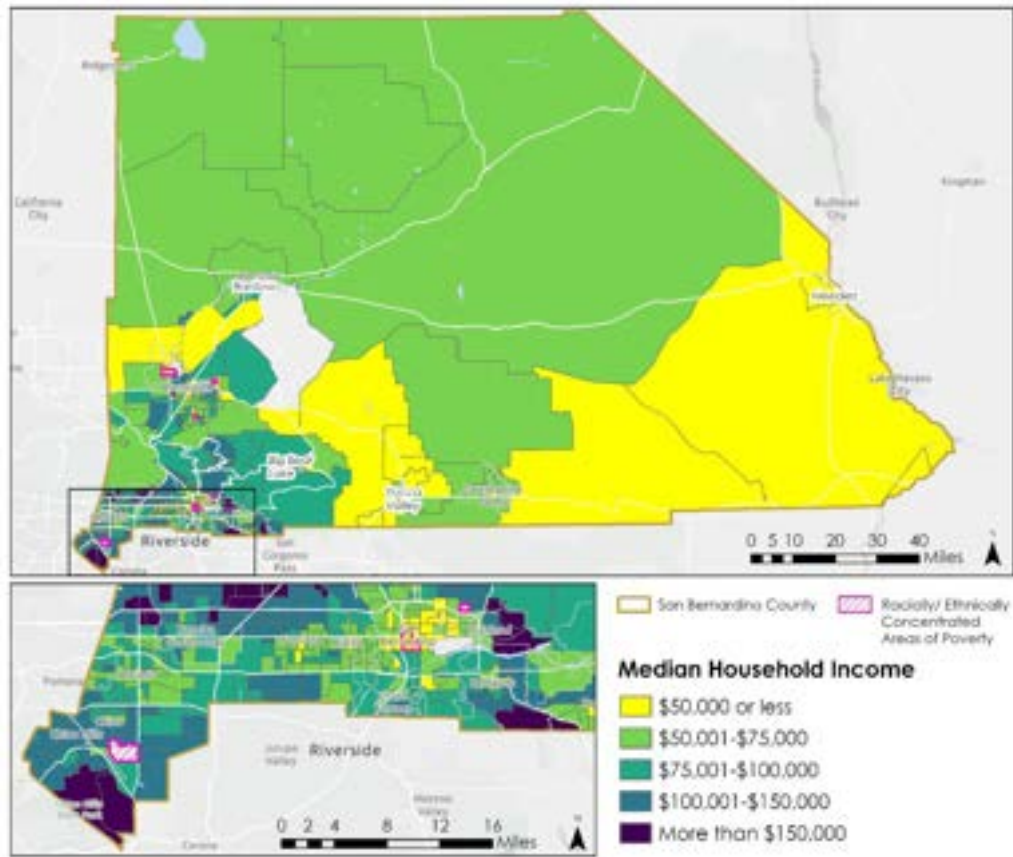
Median household incomes are highest for white residents, ($96,709) and lowest for Hispanic or Latino residents, ($59,470; see Figure 15).

Figure 15. Median Household Income by Race/Ethnicity, San Bernardino County, 2018-2022

Median Household Income by Race

Source: American Community Survey 5-Year Estimates, 2018-2022, Table S1903

Low median household incomes in many of the county's census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. The required income to cover the costs for a family of two working adults and one child in San Bernardino County, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, is estimated at about $6,963 per month (or $83,563 annually).[12] Yet, 12.9% of primary jobs held by residents pay $1,250 per month or less ($15,000 or less per year), and 32.7% of primary jobs pay between $1,251 and $3,333 (between $15,000 and $39,996 per year).[13]


[12] MIT Living Wage Calculator. (2022-2023 Update). San Bernardino County. Retrieved from: https://livingwage.mit.edu/counties/06071

[13] U.S. Census OnTheMap. (2020). Retrieved from: https://onthemap.ces.census.gov/

Jobs Proximity

Jobs in the county are clustered on the east side of the county and the far south-west cities where population is also highest, such as Chino Hills, Rancho Cucamonga, San Bernardino, and Redlands. These areas have job proximity scores that are higher than 90. The south-central tracts of the county tend to have the lowest job proximity scores, ranging from 25 or lower, including the areas in and around Yucca Valley and Twentynine Palms, (see Figure 16).

FIGURE 16.
Job Proximity, San Bernardino County, 2021
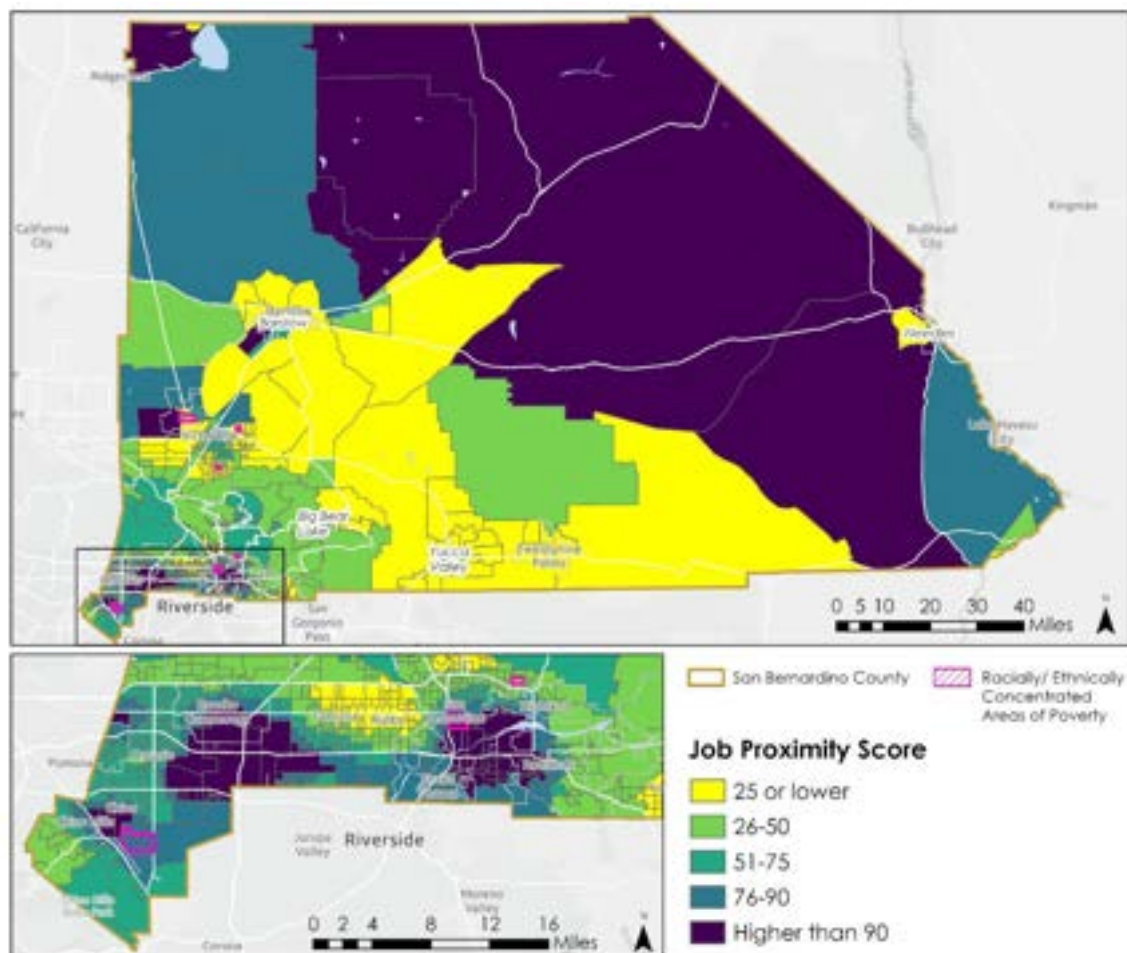
Longitudinal Employer-Household Dynamics data indicates that similar shares of workers live in and work in San Bernardino County. An estimated 767,892 people are employed in San Bernardino County, of which 52.3% live in the county and 47.7% live outside of the county. Similarly, of the 854,132 residents living in San Bernardino County, 53.0% are employed outside of the county while 47.0% are employed in the county. Given that nearly half the population residing in San Bernardino County works outside of the county, there is high level of commuting across jurisdictions and indicates that limited access to vehicles and a lack of frequent public transportation in some areas may act as barriers for residents in accessing

employment. A large share of respondents (49.9%) to the survey also noted that transportation assistance is a high need throughout the community.

TABLE 4.
Inflow and Outflow of Workers (Primary Jobs), San Bernardino County, 2022

Inflow and Outflow of Workers	#	%
LIVING IN SAN BERNARDINO COUNTY	854,132	100.0%
Living in San Bernardino County but Employed Outside of the County	452,710	53.0%
Living and Employed in San Bernardino County	401,422	47.0%
EMPLOYED IN SAN BERNARDINO COUNTY	767,892	100.0%
Employed in San Bernardino County but Living Outside of the County	366,470	47.7%
Employed and Living in San Bernardino County	401,422	52.3%

Data Source: Longitudinal Employer Household Dynamics (LODES) data, 2022.

Education

School proficiency is an indication of the quality of education that is available to residents of an area. High-quality education is a vital community resource that can lead to more opportunities—such as employment and increased earnings—and improve quality of life. San Bernardino County[14] serves 33 public school districts, including 589 public schools that serve more than 396,860 students as of the 2023-2024 school year[15].

The most recent dempgraphic data available is from the 2022-2023 school year data, which reported a total enrollment estimate of 397,426 students. Based on 2022-2023 data, the majority of students are Hispanic/Latino (71.9%), followed by white students (15.0%). About 8.5% of students are Black or African American and 4.4% are Asian. Less than 3% are students of two or more races. Students who are American Indian/Alaska Native or Native Hawaiian/Pacific Isander account for only 0.4% of students.

TABLE 5.
District Demographics and Performance, 2022-2023

	San Bernardino County	State of California[16]
NUMBER OF STUDENTS	397,426	5,852,544
NUMBER OF SCHOOLS	589	
DEMOGRAPHICS		
Black	8.5%	4.7%
Hispanic	71.9%	56.1%
Asian	4.4%	9.5%
Two or More Races	3.0%	4.3%
White	15.0%	20.1%
American Indian/ Alaskan Native	0.4%	0.4%
Economically Disadvantaged	72.4%	62.5%
English Learners	15.7%	19%

[14] San Bernardino County Superintendent of Schools. Annual Report, 2023-2024. Retrieved from: https://online.flippingbook.com/view/500857367/4/

[15] Education Data Partnership, San Bernardino County. Retrieved from: https://www.ed-data.org/county/San-Bernardino/

[16] Education Data Partnership, California. Retrieved from: https://www.ed-data.org/State/CA

	San Bernardino County	State of California[16]
Students with a Disability	13.9%	13.6%
GRADUATION RATE	85.5%	86.2%

Source: California Department of Education, 2023

While this data points to relatively low levels of access to proficient schools across the county, analysis of school proficiency by geography details specific locations with lower- and higher-performing schools (see Figure 17). The areas that rank highest on HUD's School Proficiency Index[17]—indicating better access to proficient schools—tend to be in the far south-west of San Bernardino County, including places like San Antonio Heights, parts of Chino Hills, and South Redlands. These areas have school proficiency index scores greater than 90. The areas that rank lowest on the index are clustered in southeast and southwest San Bernardino County, including in areas within the county's R/ECAPs.

Only a few parts of the district have particularly high levels of access to proficient schools. The majority of block groups in the district have school proficiency index scores of 25 or lower and between 51 and 75 out of 100, indicating generally low or moderate access across the district.

Survey results on fair housing and access to opportunity indicate that disparities in access to proficient schools are a primary concern among residents. Among survey respondents, 41.1% said that schools are not equally provided across neighborhoods in San Bernardino County, while 43.5% said that they are equally provided.

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[17] The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading (r) and math (m) on state test scores for up to three schools (i=1,2,3) within 1.5 miles of the block-group centroid. Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

Figure 17.

School Proficiency Index, San Bernardino County
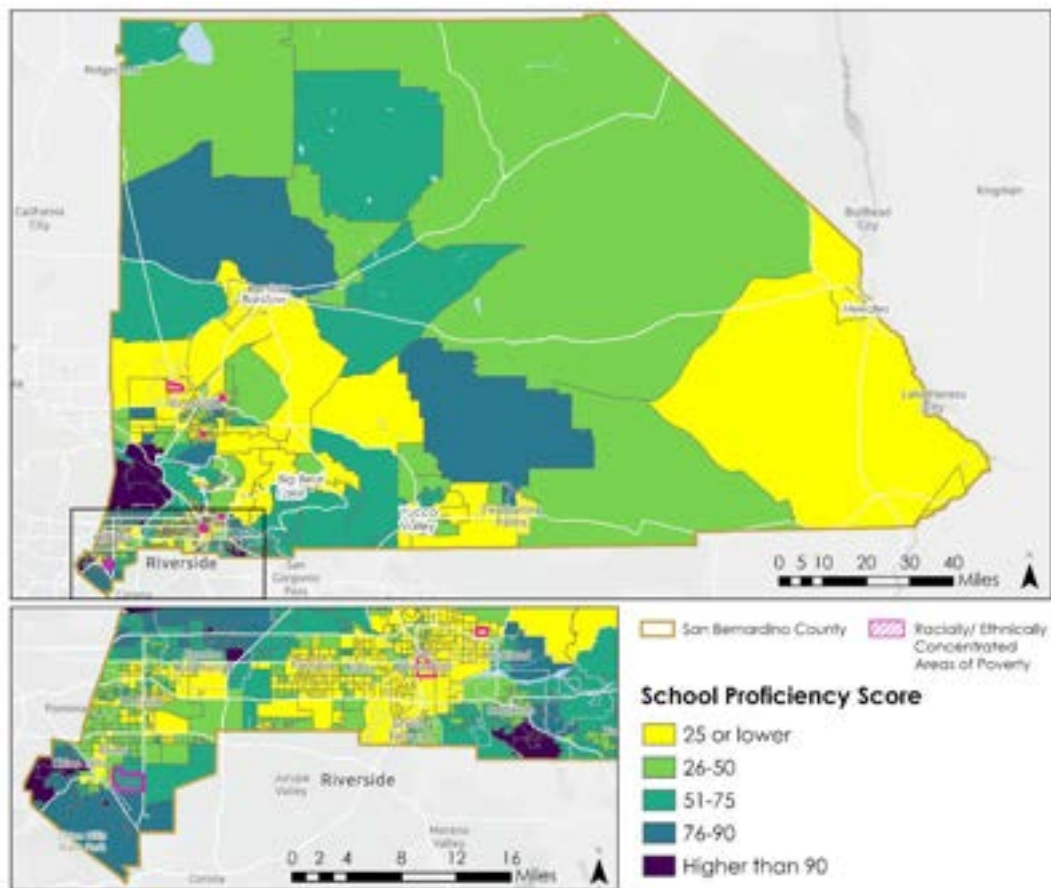
Source: HUD School Proficiency Index

Low school proficiency index scores across the county point to a high level of need for strategies to meet the needs of students. Approaches to education that seek to meet students' needs, such as the community schools' model, may provide additional support to help students succeed in school, including:

- Expanded and enriched learning time, including after-school programs, summer programs, and culturally relevant, real-world learning opportunities;
- Active family and community engagement, including service provision and meaningful partnership with students, families, and community members;
- Collaborative leadership and practices, including coordination of community school services; site-based, cross-stakeholder leadership teams; teacher learning communities; and the ongoing sharing and use of early warning data; and

- Integrated student supports, mental and physical health care, nutrition support, and housing assistance, which are often provided through strategic community partnerships.[18]

Funding for similar programs that provide collaborative, integrated support for students can help increase access to proficient schools for residents who may lack the opportunity to move to higher-performing schools or zones.

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[18] Center for Universal Education at Brookings. (2021). Addressing education inequality with a next generation of community schools: A blueprint for mayors, states, and the federal government; Maier, Daniel, Oakes, and Lam. (2017). Community Schools as an Effective School Improvement Strategy: A Review of the Evidence. Learning Policy Institute and National Education Policy Center.

Transportation

Affordable, accessible transportation makes it easier for residents to access a range of opportunities, providing connections to employment, education, fresh food, healthcare, and other services. Low-cost public transit can facilitate access to these resources, while a lack of access to affordable transportation poses barriers to meeting key needs, particularly in areas with low levels of walkability and a lack of access to vehicles.

Access to Affordable Transportation

San Bernardino County Transportation Authority (SBCTA) provides multimodal transportation service in San Bernardino County through the collaboration of Metrolink, Arrow, Omnitrans, VVTA, Mountain Transit, and three regional bus systems (see Figure 18). The SBCTA services the county's 20,000 square miles which encompasses populated urban areas as well as areas undergoing expansive residential development, in addition to resort communities and rural and desert communities[19]. In addition to traditional rail and bus services, SBCTA operates commuter programs that include personalized ridematching, rideshare incentives and rewards, and the Guaranteed Ride Home Program. Additional incentives are offered to employers as well as additional commuter resources and employee ridematching. SBCTA also operates vanpool programs that provide federally funded subsidies toward zero-emission vanpools or groups of commuters that work or attend school throughout SBCTA's service area.

43.6% of community members who responded to the survey noted that bus services are equally provided in their neighborhoods; 39.4% said bus services are not equally provided; and 21.3% indicated that they do not know.

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[19] San Bernardino County Transportation Authority. Retrieved from: https://www.gosbcta.com/about-us/about-sbcta/

FIGURE 18.

Public Transit & Rail Regional Map for San Bernardino County

HUD's Location Affordability Index models the numbers of public transit trips for residents by census tract. Estimates for moderate-income residents with income at 80% of the area median show that transit use is most common in south-west San Bernardino County in census tracts around the cities of Ontario, Fontana, Realto, Redlands, and Victorville, (see Figure 19). However, public transit ridership among moderate-income residents is overall low throughout the county, with most tracts having shares between 1.1% to 3%.

Considering transportation costs together with housing costs can provide an expanded view of a neighborhood's affordability. The Center for Neighborhood Technology sets an affordability benchmark for housing and transportation costs at no more than 45% of a household's income. With the exception of two tracts, all tracts in San Bernardino County contain housing and transit costs that account for more

than 50% of moderate-income residents' income, (see Figure 20). The combination of lower proximity to jobs and transit and higher shares of household income spent on transportation presents barriers to obtaining and maintaining employment and housing.

FIGURE 19.
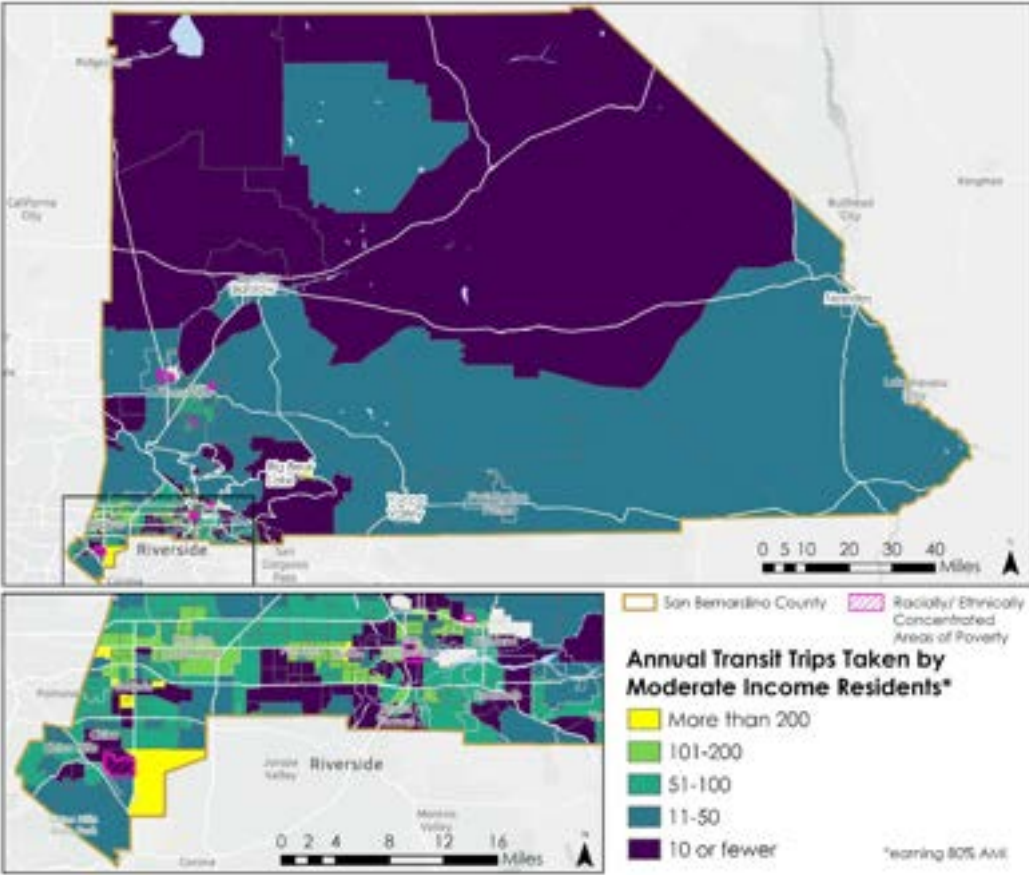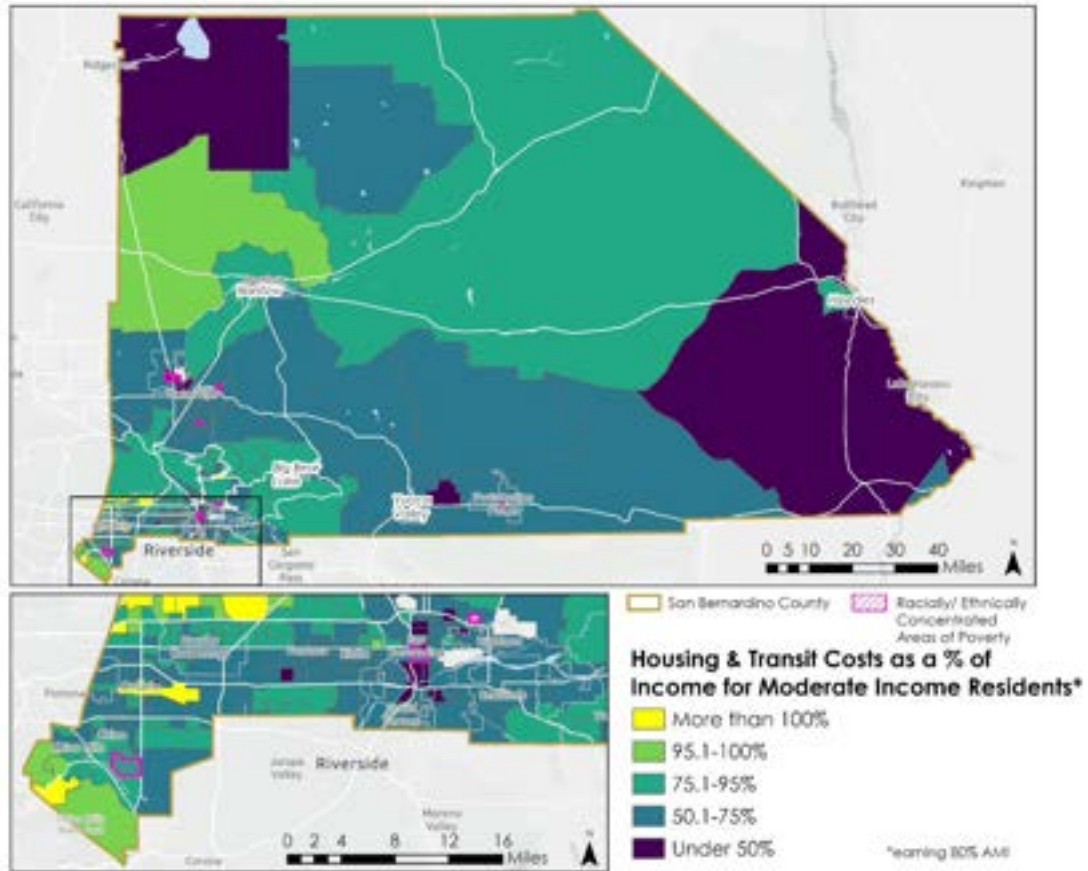Number of Annual Transit Trips for Moderate-Income Households (80% AMI)

Figure 20.

Housing and Transportation Costs as Percent of Income for Moderate-Income Households (80% AMI)
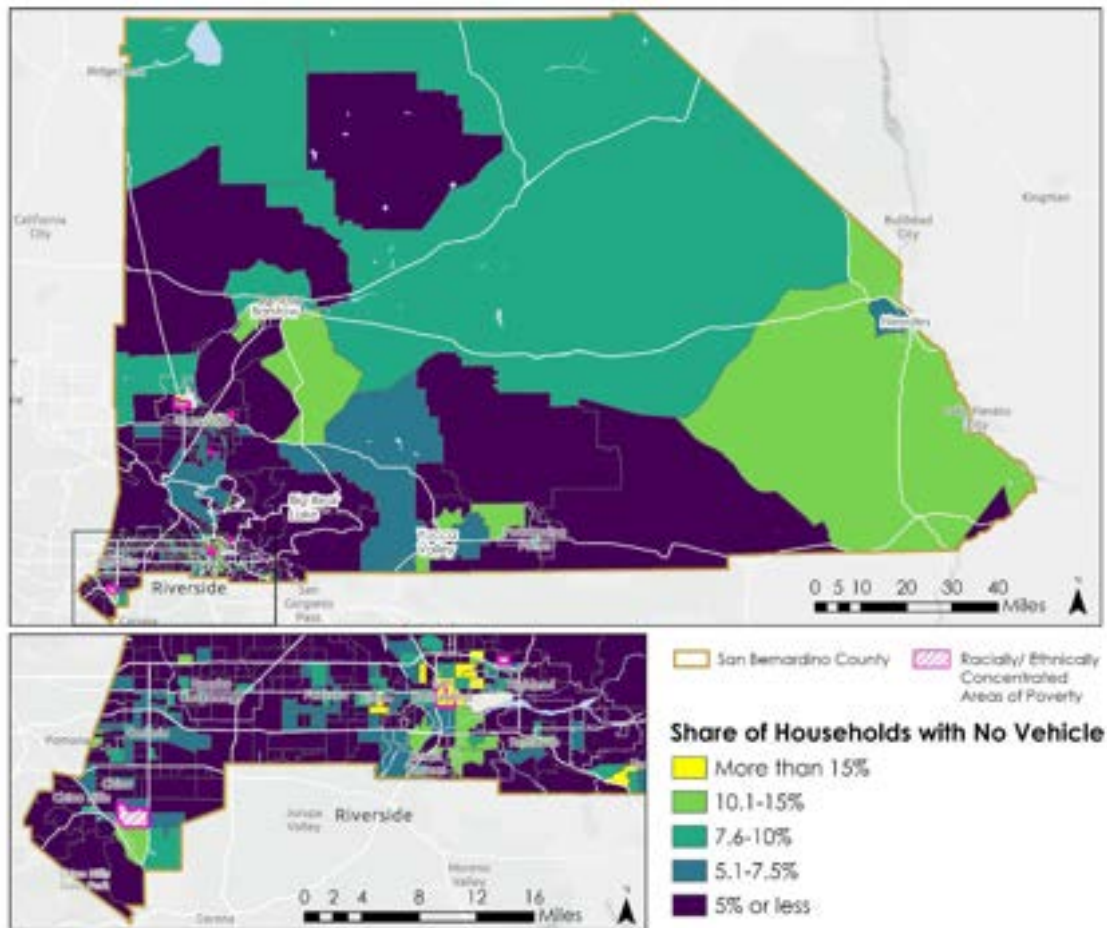
Vehicle Access

Access to vehicles also shapes residents' ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. An estimated 4.5% of households in San Bernardino County do not have a vehicle, according to American Community Survey five-year estimates for 2018-2022. While vehicle access is high overall, disparities exist by geography and reflect access to bus service in the county. Vehicle access is lowest in parts of San Bernardino city, particularly within R/ECAPS tracts in which more than 15% of households do not have a vehicle. In contrast, in much of southwest San Bernardino County, fewer than 5% of households do not have access to a vehicle (see Figure 21).

Residents and community members who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and with limited access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where bus service is most accessible.

FIGURE 21.
Vehicle Access, San Bernardino County, 2018-2022

Walkability

Along with access to transit, low-cost transportation, and vehicles, walkability shapes the extent to which residents are able to access employment, resources, and services. While the county as a whole has low levels of walkability, areas with moderate walkability are clustered in dense urban areas in the southwest portion of the county. Areas with the highest densities of pedestrian-oriented links—an indicator of walkability— are clustered in and around San Bernardino city, Redlands, Chino Hills, and Rancho Cucamonga, (see Figure 22).

Figure 22.

Walkability Score, San Bernardino County
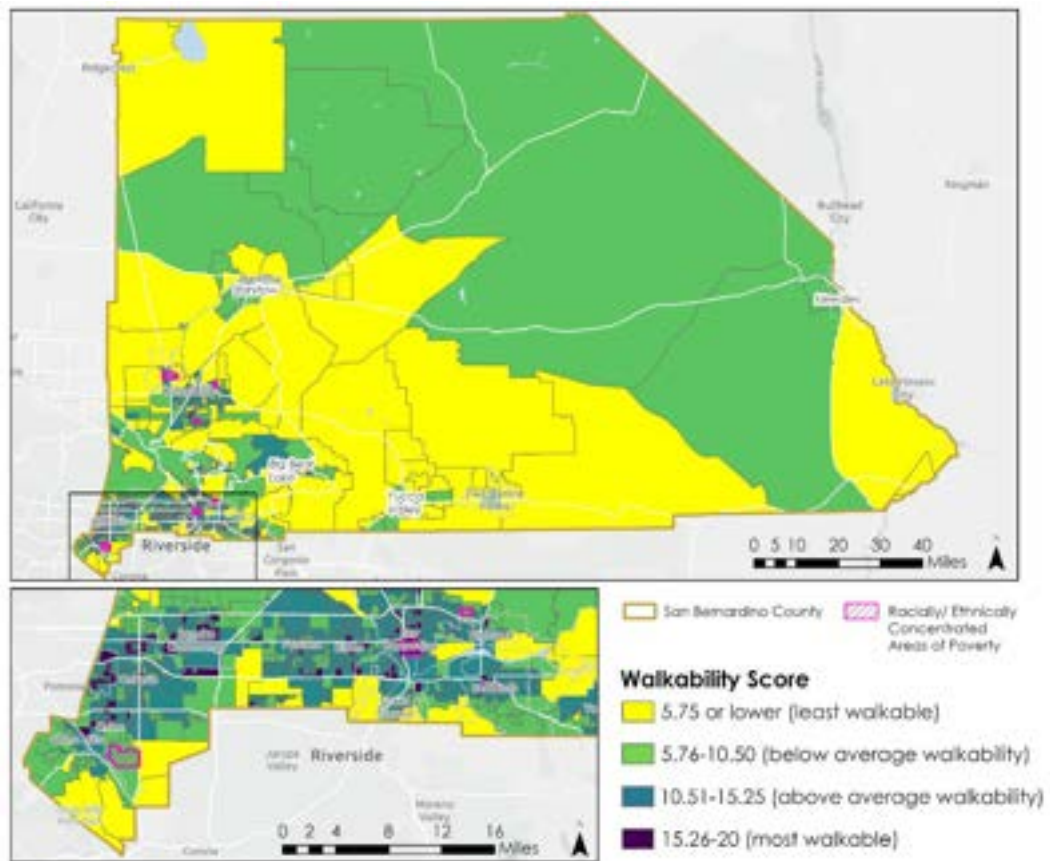
Low-Poverty Neighborhoods

Poverty rates are highest in the areas that include and surround R/ECAPs tracts such as Chino hills, San Bernardino city, and Highland, where more than 30% of residents have incomes below the poverty level, (see Figure 23). Census tracts with the lowest poverty levels are also clustered in the southeast tracts of the county in areas south of Redlands, north of Rancho Cucamonga , and around Chino Hills State Park.

Residents and community members who participated in the survey noted that barriers to fair housing choices for residents in San Bernardino County are often limited or impacted by:

- Not enough affordable housing for families;
- Not enough affordable housing for individuals;
- Displacement of residents due to rising housing costs;
- Not enough affordable housing for seniors;
- Neighborhoods that need revitalization and new investment;
- Discrimination by landlords or rental agents;
- Limited access to jobs.

A lack of affordable housing in many areas of San Bernardino County limits lower-income residents' housing choices to areas of with more affordable housing, which often coincide with areas that have higher poverty rates. The high cost of housing restricts access to housing in many areas of the city for lower-income households.

For residents who do not have access to vehicles, housing choices are also often limited by inadequate transportation access in some areas of the county, infrequent bus service, and travel times to places of employment. In this way, residents who rely on public transportation often must live near the county's SBCTA bus routes or their places of employment, or else face long commutes to jobs.

Figure 23. Percent of Population Below Poverty Level, 2018-2022
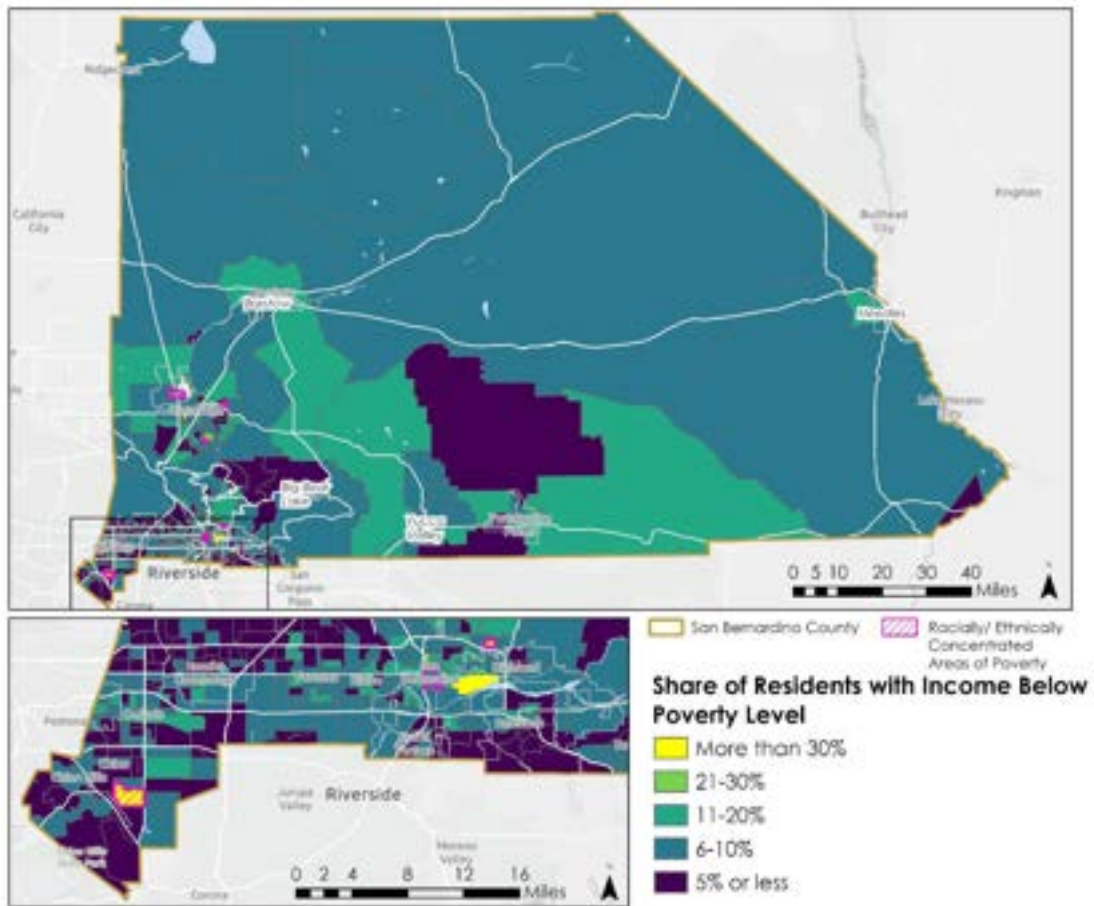
Source: 2018-2022 American Community Survey

Environmental Quality

Environmental quality and access to environmental amenities shape the opportunities available to residents. Access to parks and greenspace can provide a range of environmental, social, and health benefits, including access to nature and recreation opportunities, cleaner air and water, alternative transportation options, improvements in physical and mental health and wellbeing, and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects, including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.

Access to Parks

The Trust for Public Land estimates the need for parks by census block group based on population density, density of low-income households, density of people of color, rates of poor mental health and low physical activity, urban heat islands, and pollution burden.[20] Based on these factors, in San Bernardino County the need for parks is greatest in the southwest parts of the county including Ontario, Chino Hills, Rancho Cucamonga, Highland, Redlands, Yucaipa, as well as the south-central parts of Yucca Valley, Twentynine Palms, and Big Bear Lake, (see Figure 24). There are also several areas in and around Victorville that are also priority areas for new parks. Parks are most accessible in parts of San Bernardino city and the tracts surrounding Big Bear Lake.

Community members echoed concerns about park access in the county. About 41.5% of survey respondents indicated that there is a high need for biking and walking trails in their community and 49.7% said there is also a high need for community parks, recreational facilities, and cultural centers Additionally, 55.9% of respondents indicated that parks and trails are not equally provided throughout the county.

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[20] Trust for Public Land. (2022). The ParkServe Database. Retrieved from: https://www.tpl.org/ParkServe/About

FIGURE 24.
Park Access, San Bernardino County
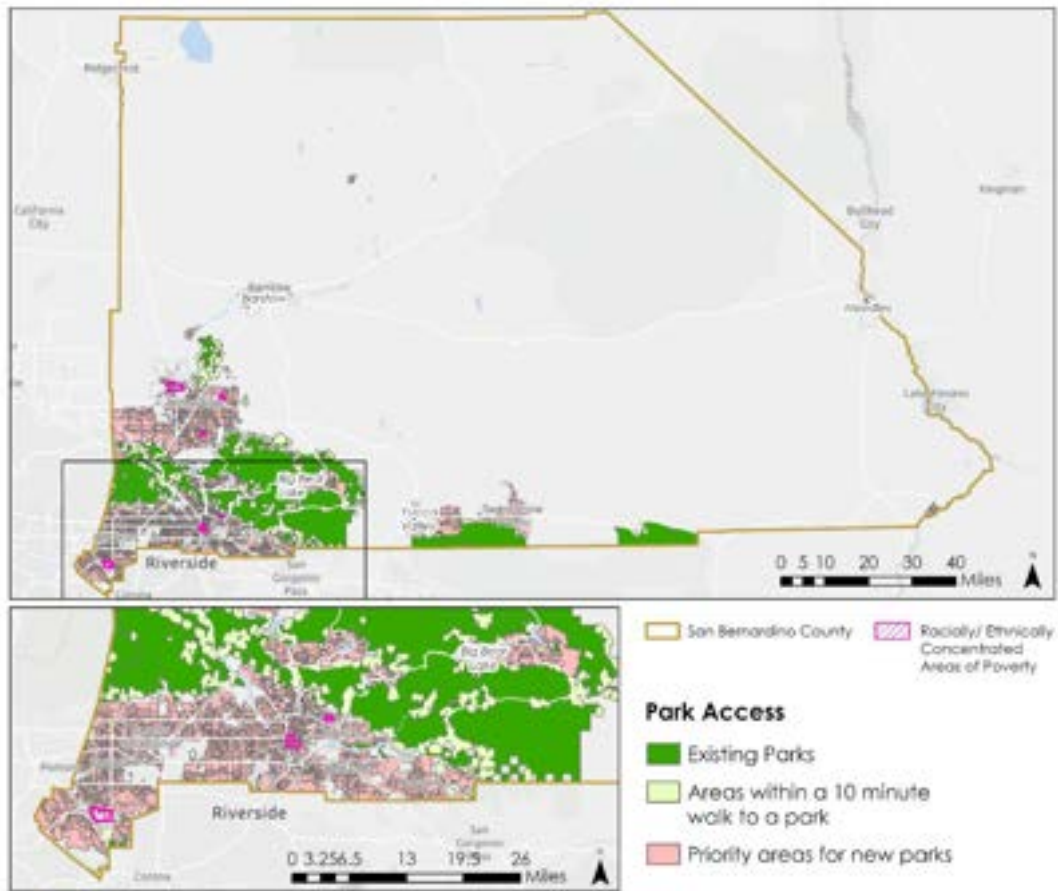
Source: Trust for Public Land ParkScore, 2023

Environmental Hazards

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. The county does not have any Superfund sites, which the U.S. Environmental Protection Agency (EPA) defines as any land that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and /

or the environment. The county has seven sites on the California Department of Toxic Substances Control Hazardous Waste and Substances Site List[21].

The EPA's National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment uses data from 2020 to examine cancer risk from ambient concentrations of pollutants.[22] San Bernardino County has low to moderate levels of cancer risk from air toxins—about 20 to 40 per million in county census tracts. Point sources of emissions are clustered in the southwestern cities of the county, particularly throughout Victorville, Barstow, Rancho Cucamonga, and Bloomington, (see Figure 25).

The Environmental Protection Agency's Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site.[23] The EPA's Risk-Screening Environmental Indicators (RSEI) Model analyzes TRI data on the amount of toxic chemicals released, together with risk factors such as the chemical's fate and transport through the environment, each chemical's relative toxicity, and the number of people potentially exposed, to calculate a numeric score designed to be compared to other RSEI scores.[24]

Toxic release inventory sites are also clustered in the southwestern portion of the county, including in and around Victorville, Rancho Cucamonga, Fontana, Ontario, and Bloomington. Victorville, in particular, has a site with a potential risk score that is several times higher than those of other nearby facilities (noted by the size of the purple dots in Figure 26), indicating significantly greater health risks for residents living near the facility. (Note: this site was identified as Cemex Construction Materials Pacific LLC, a cement plant which specializes in nonmetallic mineral product.)

[21] DTSC's Hazardous Waste and Substances Site List. Retrieved from: https://dtsc.ca.gov/dtscs-cortese-list/

[22] United States Environmental Protection Agency. National Air Toxics Assessment. (2019). Retrieved from: https://www.epa.gov/national-air-toxics-assessment

[23] U.S. EPA. (n.d.) Toxic Release Inventory Program. Retrieved from: https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory. Data retrieved from: https://www.arcgis.com/home/item.html?id=2c4a0b5f85b945f8a67125e6a93fa7fe

[24] United States Environmental Protection Agency. (n.d.) Risk-Screening Environmental Indicators (RSEI) Model. Retrieved from: https://www.epa.gov/rsei

FIGURE 25.
National Air Toxics Assessment, San Bernardino County, 2020

FIGURE 26.
Toxic Release Inventory Facilities, San Bernardino County, 2023

RSEI Hazard by Facility
- No RSEI Hazard
- 0
- >0 - 100,000
- 100,001 - 10,000,000
- 10,000,001 - 100,000,000
- 100,000,001 - 1,000,000,000
- >1,000,000,000
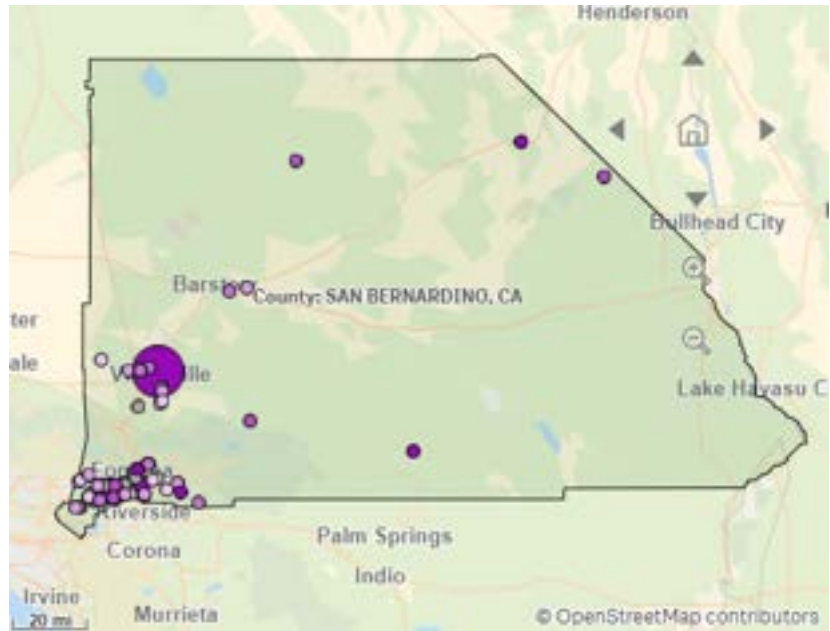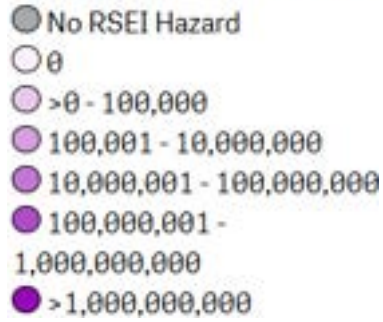
Food

Many individuals and families face challenges in accessing food that is both healthy and affordable. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may pose particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher cost of healthy foods such as produce often presents a barrier to accessing healthy food.

USDA Food Research Atlas data indicates that the share of residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in census tracts in the northwest quadrant of the county including Ridgecrest and the southeast quadrant including the tracts around Needles, Lake Havasu City, and Twentynine Palms, where 95% to 100% of residents have low incomes and low access. The neighborhoods east of the R/ECAPs tracts in San Bernardino City as well as another tract north of the city have more than 100% of their population who have low incomes and low access, (see Figure 27). In contrast, portions of some of the urban areas in the county such as Chino Hills, Rialto, Rancho Cucamonga, and Redlands tend to have the lowest shares of residents with low incomes who live more than one-half mile from a supermarket. In these tracts, fewer than 50% of residents are considered low-income and low access.

Survey respondents echoed concerns surrounding food access, with 52.7% noting that food banks and community meals are a high need throughout the county. Additionally, 39.4% of respondents indicated that grocery stores and other shopping opportunities are not equally provided throughout the county.

Poverty and a lack of access to vehicles also contribute to issues of food access and insecurity in the county. An estimated 13.8% of San Bernardino County residents were living below the federal poverty level as of the 2018 to 2022 American Community Survey five-year estimates, indicating that low incomes are a barrier for a substantial portion of residents in accessing fresh food. Poverty rates are highest in or nearby the county's R/ECAPs tracts located south of Chino Hills and in eastern San Bernardino City, where they fall above 30%.

FIGURE 27.
Percent of Population with Low Incomes and Low Access to Food Stores, San Bernardino County, 2019
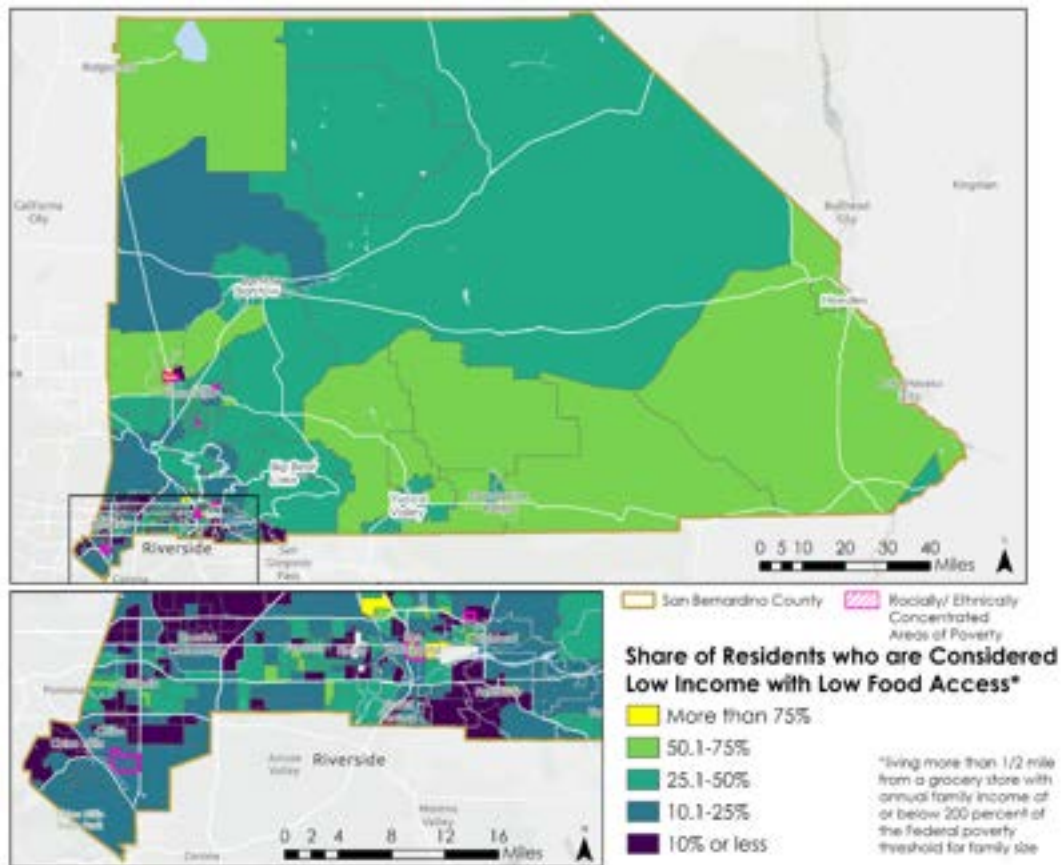
Source: USDA Food Access Research Atlas, 2019. Food store is defined as a supermarket, supercenter, or large grocery store.

Further, in many census tracts in the southwestern portion of the county—particularly in parts of San Bernardino City—significant shares of households do not have a vehicle. Vehicle access is lowest in parts of San Bernardino city, Chino Hills, Redlands, Barstow, the Needles and Lake Havasu City tracts, and Yucca Valley, in which 10% to more than 15% of households do not have a vehicle. Low levels of vehicle access indicate that food access is particularly challenging for significant proportions of households in areas of the county with limited access to bus service and low levels of walkability. In this way, the combination of uneven distribution of food outlets across the county, the substantial shares of households with low incomes, and a lack of access to vehicles creates barriers to food access and security.

Healthcare

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length of life and quality of life.

Sufficient availability of primary care physicians is essential for access to preventive and primary care, and for referrals to appropriate specialty care when needed.[25] Residents of San Bernardino County have access to healthcare providers at a rate of one primary care physician per 1,700 residents, one dentist per 1,300 residents, and one mental health provider per 340 residents (see Table 6). These figures indicate that residents of the county have less access to primary care physicians, dentists, and mental health providers than do residents in the state of California, however, have slightly more access to dentists than the United States as a whole.

TABLE 6.
Ratio of Population to Healthcare Providers, San Bernardino County, State of California, and United States, 2024

	San Bernardino County	California	United States
Primary Care Physicians	1,700:1	1,230:1	1,330:1
Dentists	1,300:1	1,080:1	1,360:1
Mental Health Providers	340:1	220:1	320:1

Source: County Health Rankings, Area Health Resource File/ American Medical Association, 2024[26]

The United States Health Resources and Services Administration (HRSA) identifies geographic areas with a lack of access to primary care services, known as Medically Underserved Areas.[27] The HRSA calculates an Index of Medical Underservice based on the number of providers per 1,000 population ratio, the percent of population at 100% of the Federal Poverty Level, the percent of population age 65 and over, and the infant mortality rate. The designated underserved areas in San Bernardino County include the tracts around Needles and Lake Havasu City, the tracts between Big Bear Lake and Yucca Valley, some tracts (including the R/ECAPs tract) in San Bernardino City, and other scattered tracts around Barstow,

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[25] County Health Rankings. (2021). Primary Care Physicians. Retrieved from: https://www.countyhealthrankings.org/explore-health-rankings/measures-data-sources/county-health-rankings-model/health-factors/clinical-care/access-to-care/primary-care-physicians, and Steinbrook, R. (2009). Easing the shortage in adult primary care—is it all about money?. New England Journal of Medicine, 360(26), 2696-2699.

[26] County Health Rankings 2022 Measures. Retrieved from: https://www.countyhealthrankings.org/health-data/california/san-bernardino?year=2024

[27] Health Services and Resources Administration. (2022). Scoring Shortage Designations. Retrieved from: https://bhw.hrsa.gov/workforce-shortage-areas/shortage-designation/scoring

Victorville, Fontana, Grand Terrace, Highland, and Redlands. These underserved areas are mostly concentrated in the southwest and southeast quadrants of the county, (see Figure 28).

Figure 28.

Medically Underserved Areas, San Bernardino County
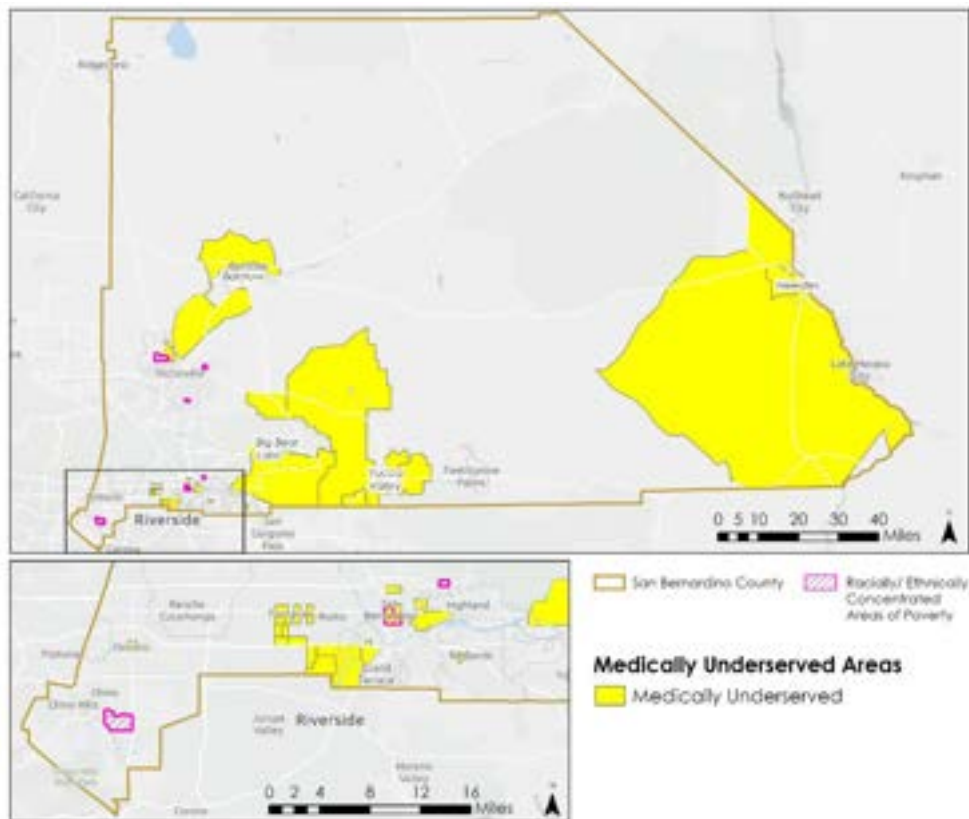
Source: Health Resources and Services Administration

In addition to access to healthcare providers, health insurance coverage is an important component of access to needed healthcare—including preventive care—and to maintaining financial security. While the share of residents with health insurance in the county overall has decreased to 8.6% as of the 2018 to 2022 American Community Survey five-year estimates, down from 16.5% in the 2011-2015 estimates, shares of uninsured residents continue to vary by location across the county.

The proportion of residents who are insured is highest in one tract in the central part of the county, and in several tracts in the southwestern quadrant of the county, where more than 95% of residents have insurance. There is only one tract containing the lowest share of residents with insurance (70% or less), located near Twentynine Palms. Most census tracts have between 81% to 95% of residents who have health insurance, (see Figure 29).

Overall, healthcare access is shaped by multiple factors, including availability of providers, health insurance coverage, income, housing affordability and stability, and access to vehicles or other transportation options. Investments in programs designed to increase access to healthcare—such as expanding access to health insurance, investing in telehealth and mobile health services, education about where to access health services, and improved cultural responsiveness—may help increase access for residents. Because of geographic disparities in health insurance coverage, efforts such as increasing enrollment in Medicaid and Marketplace health insurance plans and providing access to low-cost health services may be most effective in addressing goals of improving access to healthcare by focusing efforts on census tracts with low levels of health insurance coverage.

FIGURE 29.
Percent of Population that is Uninsured, San Bernardino County, 2018-2022
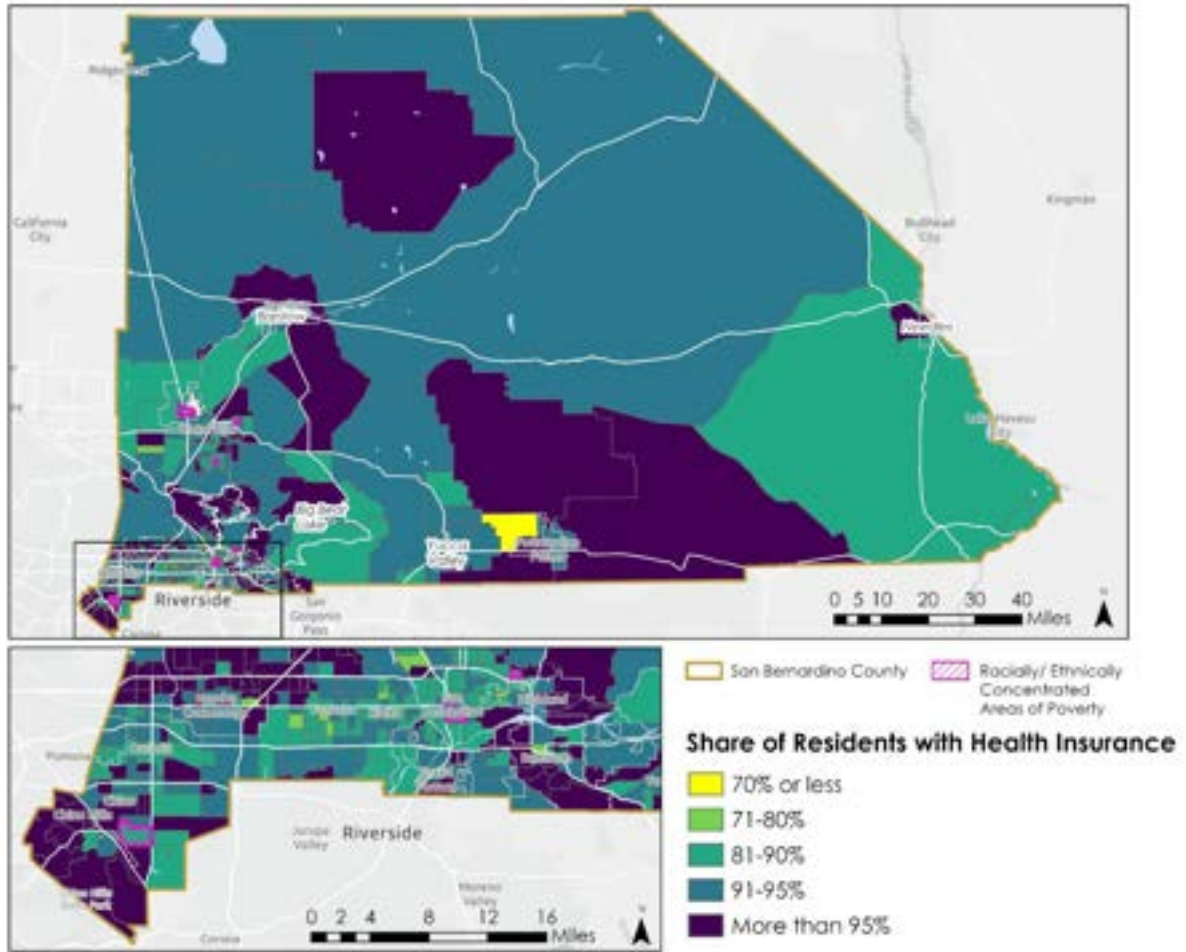
HOUSING PROFILE

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

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies show that affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.[28] Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.[29] Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.[30]

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

Housing Supply Summary

The Riverside-San Bernardino-Ontario, CA MSA has approximately 1,584,750 housing units, of which almost half (733,104 units, or 46.3%) are in San Bernardino County. While the total number of housing

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

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

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

units in the MSA grew at a slightly faster rate (5.9%) than that of San Bernardino County (4.7%) from 2012 through 2022, both the county and MSA experienced high levels of growth in occupied housing units (10.0% and 10.5%, respectively).

The American Community Survey's definition of vacancy includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Using this definition, the vacancy rate in San Bernardino County is estimated to be 10.0% as of the 2018-2022 American Community Survey, down from 14.2% in 2008-2012. Vacancies in the wider metro area occur at a similar rate as in San Bernardino County (11.0%). These rates are higher than that of the state of California overall (7.8% as of the 2018-2022 ACS).

Shares of for-sale homeowner units are particularly low, pointing to tight housing markets and high demand for homeownership. The share of owner units that are vacant and for sale (homeowner vacancy rate) is just 1.3% in county and the MSA. The share of renter units that are vacant and for rent (renter vacancy rate) is 3.3% in San Bernardino County and 4.0% in the MSA, indicating greater availability of rental housing in the MSA relative to the county. About 2% of units in the county and MSA are vacant for reasons other than being available for sale or rent, being rented or sold but not yet occupied, or use as seasonal housing. These reasons include need for rehabilitation or repair, foreclosure, legal proceedings, abandonment, and other reasons. Both the county and MSA have seen declines in vacant housing units, indicating high demand for housing and increasingly tight housing markets. The following analysis examines several features of housing supply, including structure type, size, tenure, and age of housing.

TABLE 7. Housing Units by Occupancy Status

	2008 to 2012	2018 to 2022	2012 to 2022 Change
TOTAL HOUSING UNITS	698,715	733,104	4.7%
Occupied Housing Units	599,698	659,928	10.0%
Vacant Housing Units	99,107	73,176	-26.2%
Vacancy Rate	14.2%	10.0%	-4.2 percentage points

Data Source: 2008-2012 and 2018-2022 5-Year ACS, Table DP04.

Jurisdictions with a variety of housing structure types are better able to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 8 shows housing units by structure types in San Bernardino County and the Riverside-San Bernardino-Ontario, CA MSA. Single family detached homes are the predominant housing type, making up about 69% to 70% of housing units across the county and MSA. In San Bernardino County, units in large multifamily buildings of 20 or more units are the next most common (7.8%), followed by units in small multifamily buildings of five to 19 units (6.2%), units in duplexes, triplexes, and quadruplexes (6.1%), and mobile homes (5.7%). Single-family attached units comprise 4.4% of units.

Relative to the county, the MSA has a slightly lower share of units in large multifamily structures of 20 or more units (6.2%) and a slightly greater share of mobile homes (7.3%).

The high shares of single family-detached structures both the county and MSA may pose limitations on residents in obtaining housing in units of other housing types, including 'missing middle' housing, such as duplexes, triplexes, quadruplexes, units in small apartment buildings, or other housing types that may provide opportunities for increased affordability, variety in housing unit size, or specific amenities or opportunities for social connection. When neighborhoods contain a concentration of similar housing types, residents may find it difficult to obtain housing that meets their needs or to remain in their neighborhoods of choice as they experience life changes.

TABLE 8.
Housing Units by Structure

Units in Structure	San Bernardino County		Riverside-San Bernardino-Ontario MSA	
	#	%	#	%
1, Detached	510,741	69.7%	1,096,247	69.2%
1, Attached	32,242	4.4%	79,093	5.0%
2 to 4	45,072	6.1%	87,258	5.5%
5 to 19	45,613	6.2%	105,751	6.7%
20 or more	56,937	7.8%	98,942	6.2%
Mobile Home	41,493	5.7%	115,226	7.3%
Other (RV, Boat, Van, etc.)	1,006	0.1%	2,233	0.1%
TOTAL	733,104	100%	1,584,750	100%

Data Source: 2018-2022 5-Year American Community Survey, Table B25024.

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

Table 9 details housing units by the number of bedrooms and resident tenure (renters or homeowners). In San Bernardino County and the Riverside-San Bernardino-Ontario MSA, the vast majority (about 82% to 83%) of owner-occupied units have three or more bedrooms. Another 14% to 16% of owner-occupied units have two bedrooms. Studio and one-bedroom units are the least common owner-occupied units in both areas, comprising fewer than 3% of units.

Compared to owner-occupied units, rental units tend to have fewer bedrooms. Two-bedroom units are the most common renter-occupied housing size, comprising about 39% to 42% of units in the county and MSA. Three-bedroom units are the next most common, comprising about 25% to 26% of renter-occupied units across the two areas. Studios and one-bedroom units are significantly more common among renter-occupied units than homeowner units, making up about 22% to 23% of renter-occupied units in the county and MSA. Units with four or more bedrooms make up about 11% to 13% of all rented units in the county and MSA.

TABLE 9.
Housing Units by Size and Tenure

Number of Bedrooms	San Bernardino County		Riverside-San Bernardino-Ontario MSA	
	#	%	#	%
OWNER-OCCUPIED HOUSING UNITS				
0 Bedrooms	3,253	0.8%	6,721	0.7%
1 Bedroom	7,218	1.8%	15,886	1.7%
2 Bedrooms	58,231	14.4%	146,499	16.0%
3 Bedrooms	180,190	44.7%	380,228	41.5%
4 or More Bedrooms	154,213	38.3%	367,592	40.1%
TOTAL	403,105	100%	916,926	100%
RENTER-OCCUPIED HOUSING UNITS				
0 Bedrooms	11,351	4.4%	22,912	4.6%
1 Bedroom	45,175	17.6%	87,768	17.8%
2 Bedrooms	106,485	41.5%	190,517	38.6%
3 Bedrooms	64,425	25.1%	125,619	25.5%
4 or More Bedrooms	29,387	11.4%	66,162	13.4%
TOTAL	256,823	100%	492,978	100%

Data Source: 2018-2022 5-Year American Community Survey, Table SB25042.

NOTE: Unoccupied units are not included in this table because tenure data is not available for these units.

The low shares of owner-occupied units with zero to two bedrooms across the county and MSA points to challenges for homebuyers seeking smaller housing units that may provide increased levels of affordability and have lower maintenance costs. Renter households with large families, on the contrary, may experience challenges securing housing with more than three bedrooms.

An assessment of the region's housing conditions can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of housing can have a substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Homes built prior to 1950 have a high likelihood of containing lead-based paint. However, the use of lead-based paint did not end until 1978 and may affect an even larger number of households.

Development of new market-rate and subsidized housing units can support housing affordability and reduce displacement of lower-income residents. In contrast, areas with growing populations in which few new housing units are built tend to experience housing shortages and reduced affordability. Subsidized units, such as those built with low-income housing tax credits and other federal and state subsidies, have been found to be particularly protective in reducing displacement.[31]

Data on age of housing in San Bernardino County and the Riverside-San Bernardino-Ontario, CA MSA points to a large share of older housing stock and a decline in construction of new units since 2010 (see Table 10). An estimated 44.6% of units in the county and 37.2% of units in the MSA are in structures built prior to 1980. The MSA contains a greater share of newer housing, with 27.4% of units built in 2000 and later, compared to just 20.3% in the county. Just 5.9% of units in the county (43,126 units) were built in 2010 or later, compared to 7.5% of units in the MSA (119,568 units). The older housing stock in the county and MSA may pose both economic and public health challenges, particularly for individuals and families living in older housing units.

[31] Zuk, M. and Chapple, K. (2016). Housing Production, Filtering and Displacement: Untangling the Relationships. Berkeley Institute of Governmental Studies. Retrieved from: https://www.urbandisplacement.org/wp content/uploads/2021/08/udp_research_brief_052316.pdf

TABLE 10. Age of Housing

Year Structure Built	San Bernardino County		Riverside-San Bernardino-Ontario, CA MSA	
	Number	Percent	Number	Percent
2010 to 2022	43,126	5.9%	119,568	7.5%
2000 to 2009	105,346	14.4%	316,038	19.9%
1990 to 1999	93,589	12.8%	220,928	13.9%
1980 to 1989	163,507	22.3%	338,193	21.3%
1970 to 1979	121,066	16.5%	239,163	15.1%
1960 to 1969	72,913	9.9%	135,339	8.5%
1950 1959	79,519	10.8%	129,313	8.2%
1949 or earlier	54,038	7.4%	86,208	5.4%
TOTAL	733,104	100%	1,584,750	100%

Data Source: 2018-2022 Five-Year American Community Survey, Table B25034.

Housing Costs and Affordability

The availability of housing that is both affordable and in good condition was a common need identified by residents and stakeholders, particularly for low- and moderate-income households. The National Low Income Housing Coalition's annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. The figure below shows annual household income and hourly wages needed to afford Fair Market Rents in San Bernardino County.

FIGURE 30. Required Income, Wages, and Hours to Afford Fair Market Rents in San Bernardino County, 2024
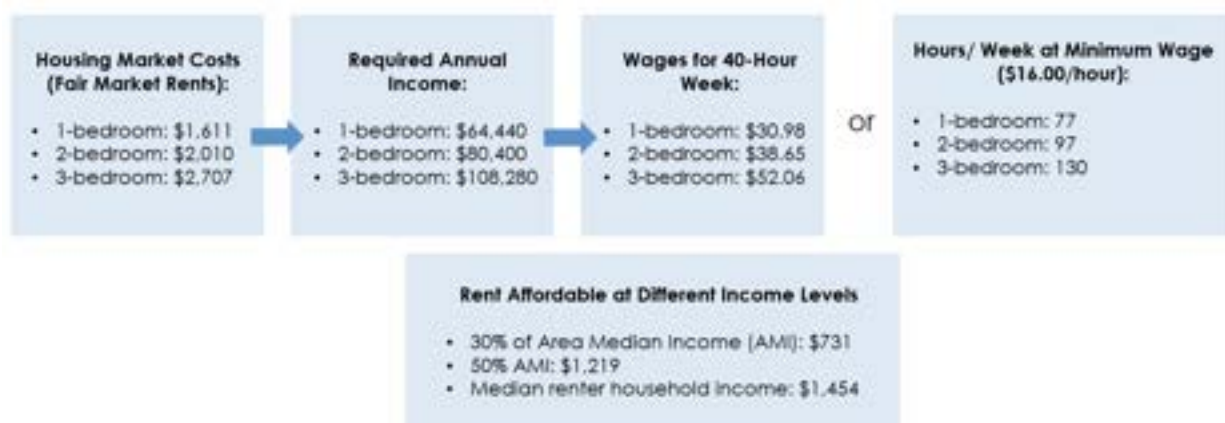
Data Source: National Low Income Housing Coalition Out of Reach 2024, Accessed from https://nlihc.org/oor/state/ca

To afford a two-bedroom rental unit—the county's most common rental type—without being cost burdened, a renter household would need to earn an annual income of $80,400, which translates to a 40-hour work week at an hourly wage of $38.65. It would take a 97-hour work week at the minimum wage of $16.00 to afford the same two-bedroom unit. According to the Out of Reach Report, the median renter household income in San Bernardino County is $58.155, which is lower than the necessary annual income to afford a one-bedroom unit at fair market rent.

The American Community Survey also provides estimates on monthly renter and homeowner costs. As of the 2018-2022 American Community Survey five-year estimates, about 56% to 59% of renter households across the county and MSA spend less than $1,500 per month on rent, while about 24% to 25% spend $1,500 to $1,999. About 18% to 20% of households across the county and MSA spend $2,000 or more on rent. More recent data from the Zumper database shows average rents in the county at $1,951 for a two-bedroom unit and $2,546 for a three-bedroom unit as of November 2024, indicating sharp increases in rental costs in recent years. Renters earning the median renter household income may thus find it difficult to find housing in San Bernardino County at an affordable rate for their income level.

FIGURE 31. Contract Rent, San Bernardino County and Riverside-San Bernardino-Ontario, CA MSA
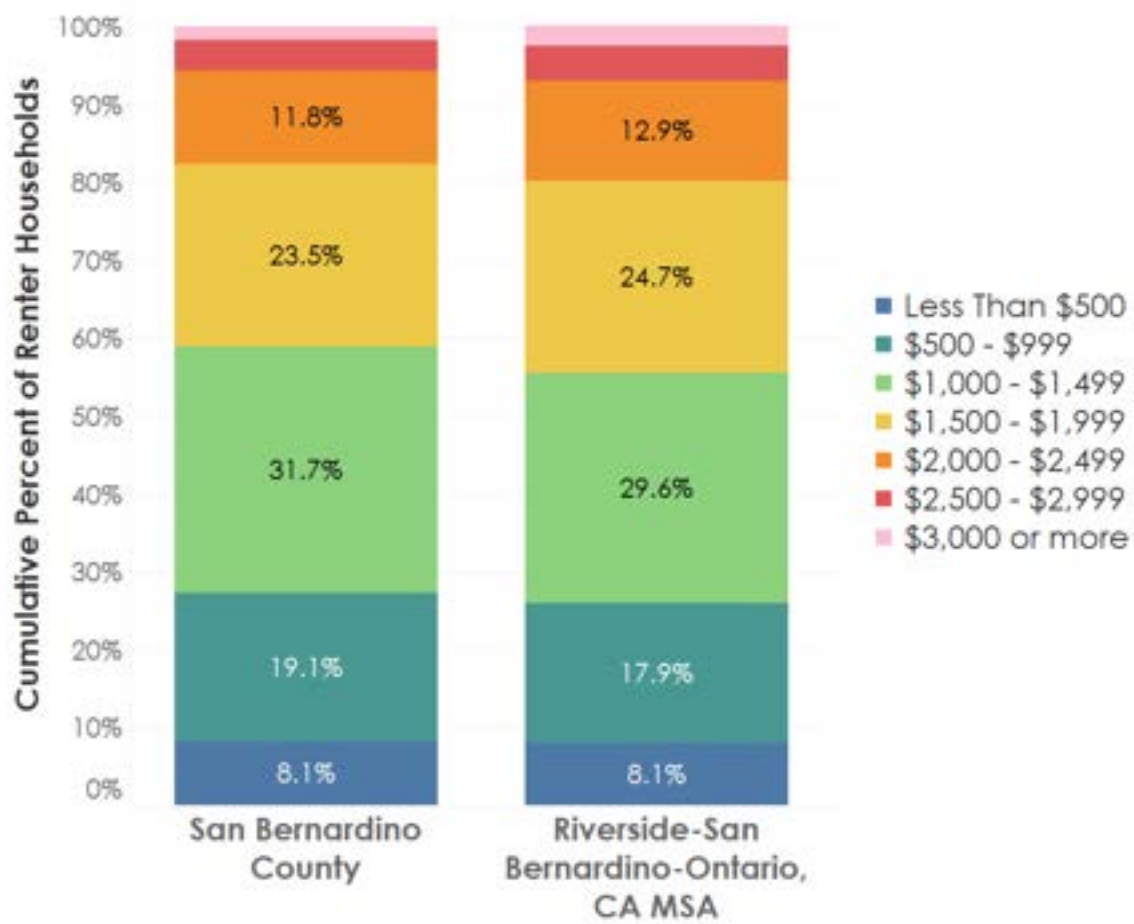
Data Source: 2018-2022 ACS 5-Year Estimates, Table B25056.

For many San Bernardino County households, homeownership is more expensive than renting. As of the American Community Survey five-year estimates for 2018-2022, an estimated 56.7% of county homeowners and 58.9% of homeowners in the MSA spend $1,500 or more per month on housing—a larger share than the estimated 41% to 45% of renter households spending within this same range. Owner households in the county and MSA are also significantly more likely to spend $2,500 or more per month on housing costs than renters (about 26% to 29% of homeowner households, compared to about 6% to 7% of renter households). More recent data from Zillow's Home Value Index (ZHVI) estimates the typical home value in San Bernardino County at $541,543 as of October 2024, a 55.6 % increase over the typical home value of $348,040 in October 2019. These values indicate steep increases in home prices in recent years and barriers to homeownership for lower-income residents. As home values and interest rates have increased, renting is generally more accessible to low-to-moderate income families than homeownership in San Bernardino County.

FIGURE 32. Monthly Owner Costs, San Bernardino County and Riverside-San Bernardino-Ontario, CA MSA

Data Source: 2018-2022 ACS 5-Year Estimates, Table B25094.

Housing Needs

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

a) A household is cost burdened if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.

b) A household is overcrowded if there are more than 1.0 people per room, not including kitchen or bathrooms.

c) A housing unit lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.

d) A housing unit lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

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

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

As shown in Table A below, approximately 35.5% of owner households and 62.0% of renter households in San Bernardino County have at least one housing problem, for an overall total of 46.7% of households experiencing housing problems. The most common type of housing problem is cost burden, with 18.0% of owners and 24.8% of renters being cost burdened, and an additional 11.0% of owners and 28.0% of renters being severely cost burdened. The second most common type of housing problem is overcrowding, with 6.4% of owners and 11.8% of renters experiencing mild overcrowding, and 2.0% of owners and 5.6% of renters experiencing severe overcrowding. Incomplete kitchen or plumbing facilities are significantly less common, with 0.4% of owners and 1.7% of renters experiencing this problem.

Tables B and C illustrate housing problems in San Bernardino County by disability status and by race and ethnicity, highlighting the groups most vulnerable to substandard housing conditions.

Table B shows that individuals with disabilities face housing problems at disproportionately higher rates. 49.3% of those with ambulatory disabilities and 51.3% of those with cognitive disabilities have at least one housing problem, compared to 38.5% of the overall population. Those with hearing or vision

disabilities experience housing problems at a slightly lower rate of 36.2%, while individuals with self-care or independent living disabilities are similarly affected, with 47.8% experiencing issues.

In Table C, housing problems are notably more prevalent among certain racial and ethnic groups. Black and Hispanic households are disproportionately affected, with 40.0% and 35.8%, respectively, experiencing housing problems overall, compared to 26.3% of White households. Black renters, in particular, face a significant burden, with 42.7% experiencing housing problems and 31.9% facing severe issues, nearly double the rates for Black homeowners, of whom 15.2% experience severe housing problems. Similarly, Hispanic renters are heavily impacted, with 39.7% experiencing housing problems and 31.1% facing severe issues, compared to 18.9% of Hispanic homeowners who face severe problems.

Asian/Pacific Islander households also face notable challenges, though at slightly lower rates. 29.6% of Asian/Pacific Islander households experience housing problems overall. Among renters in this group, 33.5% face housing problems, with 25.9% experiencing severe issues, compared to 27.5% of Asian/Pacific Islander homeowners with housing problems and 16.6% facing severe issues.

Across all racial and ethnic groups, renters are consistently more likely to face housing problems than homeowners. For example, 39.7% of Hispanic renters experience housing problems, compared to 33.0% of Hispanic homeowners, while 33.5% of Asian/Pacific Islander renters face housing problems, compared to 27.5% of Asian/Pacific Islander homeowners. Native American residents show relatively lower rates of housing problems; however, the small population size may affect the reliability of these figures.

Table A: Households with Housing Problems by Type in San Bernardino County, 2016-2020

Housing Problem	Housing Status			
	Owners		Renters	
	#	%	#	%
Cost Burden	24,665	18.0%	24,815	24.8%
Severe Cost Burden	15,145	11.0%	27,999	28.0%
Overcrowding	8,735	6.4%	6,857	11.8%
Severe Overcrowding	2,700	2.0%	3,146	5.6%
Incomplete Kitchen or Plumbing Facilities	610	0.4%	2,123	1.7%
Total Households w/ Problems	48,760	35.5%	61,940	62.0%
Total Households	**137,265**	**100.0%**	**99,920**	**100.0%**

Source: 2016-2020 CHAS, Table 3

Table B: Households with Housing Problems by Disability Status in San Bernardino County, 2016-2020

Disability Type	Housing Problem Status					
	With Housing Problems		Without Housing Problems		TOTAL	
	#	%	#	%	#	%
Hearing/Vision	3,125	36.2%	5,395	62.6%	8,625	100%
Ambulatory	18,680	49.3%	19,245	50.7%	37,925	100%
Cognitive	15,225	51.3%	14,470	48.7%	29,695	100%
Self-Care/Independent Living	15,310	47.8%	16,710	52.2%	32,020	100%
TOTAL	**62,645**	**26.4%**	**65,950**	**38.6%**	**128,595**	**100%**

Source: 2015-2019 CHAS, Table 6

Table C: Housing Problems in Renters and Owners by Race and Ethnicity, 2016-2020

Housing Type & Problems	Race/Ethnicity									
	Black		White		Hispanic		Asian/Pacific Islander		Native American	
	#	%	#	%	#	%	#	%	#	%
RENTERS										
Housing Problem(s)	8,535	42.7%	7,655	33.5%	27,005	39.7%	1,865	33.5%	85	30.9%
Severe Housing Problem(s)	6,375	31.9%	5,270	23.1%	21,180	31.1%	1,445	25.9%	70	25.5%
No Housing Problems	5,060	25.3%	9,895	43.4%	19,865	29.2%	2,260	40.6%	120	43.6%
TOTAL RENTERS	**19,970**	**100.0%**	**22,820**	**100.0%**	**68,050**	**100.0%**	**5,570**	**100.0%**	**275**	**100.0%**
OWNERS										
Housing Problem(s)	3,665	34.9%	10,290	22.6%	30,800	33.0%	2,915	27.5%	80	25.0%
Severe Housing Problem(s)	1,600	15.2%	4,590	10.1%	17,655	18.9%	1,760	16.6%	30	9.4%
No Housing Problems	5,250	49.9%	30,635	67.3%	44,745	48.0%	5,910	55.8%	210	65.6%
TOTAL OWNERS	**10,515**	**100.0%**	**45,515**	**100.0%**	**93,200**	**100.0%**	**10,585**	**100.0%**	**320**	**100.0%**
ALL HOUSEHOLDS										
Housing Problem(s)	12,200	40.0%	17,945	26.3%	57,805	35.8%	4,780	29.6%	165	27.7%
Severe Housing Problem(s)	7,975	26.2%	9,860	14.4%	38,835	24.1%	3,205	19.8%	100	16.8%
No Housing Problems	10,310	33.8%	40,530	59.3%	64,610	40.1%	8,170	50.6%	330	55.5%
TOTAL	**30,485**	**100.0%**	**68,335**	**100.0%**	**161,250**	**100.0%**	**16,155**	**100.0%**	**595**	**100.0%**

Homeownership and Lending

Homeowner Homeownership is vital to a community's economic well-being. It provides the opportunity to build wealth, is generally associated with higher levels of civic engagement,[32] and is correlated with positive cognitive and behavioral outcomes among children.[33]

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2022, the U.S. Census Bureau reported a 25.4 percentage point gap in homeownership rate between white and Black households, representing a slight widening of the gap since 2002 (24.3 percentage points). Over the same period, the gap in the homeownership rate between white and Hispanic households narrowed from 24.7 to 21.8 percentage points.[34]

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is eight percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference for urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable housing.[35]

The map that follows shows the homeownership rate by census tract in San Bernardino County. The homeownership rate is highest in parts of southwest San Bernardino County, where it tops 90% in 31 census tracts, including in parts of Chino Hills, Highland, Rancho Cucamonga, Redlands, Yucaipa, and areas around Victorville and north of Lake Arrowhead. The homeownership rate is lowest in two large census tracts in central San Bernardino County and in one census tract north of the city of Grand Terrace, where it falls below 5%. Homeownership rates range from 5% to 20% in 26 additional census tracts around Adelanto, Apple Valley, Grand Terrace, Hesperia, Loma Linda, Rancho Cucamonga, Rialto, Redlands, and the city of San Bernardino (see Figure 33).

The table that follows shows numbers of owner and renter households, as well as homeownership rates, by race and ethnicity for San Bernardino County. Owner-occupied households make up 61.1% of all households in the county. Homeownership rates are highest among Asian/Pacific Islander and white

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

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

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

35 Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. July 2018. www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf.

households in the county (69.7% and 66.0%, respectively). The homeownership rate is lowest among Black households (37.8%; see Table 11).

TABLE 11.
Home Ownership and Rental Rates by Race and Ethnicity

Householder Race / Ethnicity	SAN BERNARDINO COUNTY		
	Owner Households	Renter Households	Home Ownership Rate
White	219,830	113,084	66.0%
Black	22,142	36,421	37.8%
Asian / Pacific Islander	37,896	16,503	69.7%
Native American	4,374	3,180	57.9%
Hispanic	175,599	126,852	58.1%
Two or More Races	52,895	32,828	61.7%
Some Other Race	65,968	54,807	54.6%
TOTAL	**403,105**	**256,823**	**61.1%**

Source: 2018-2022 ACS 5-Year Estimates, Table S2502.

NOTE: *Data presented are number of households, not individuals. Totals for all races are greater than totals in the last row due to potential for households to identify with a race and Hispanic or Latino origin.*

Figure 33. Homeownership Rate by Census Tract, San Bernardino County, 2018-2022
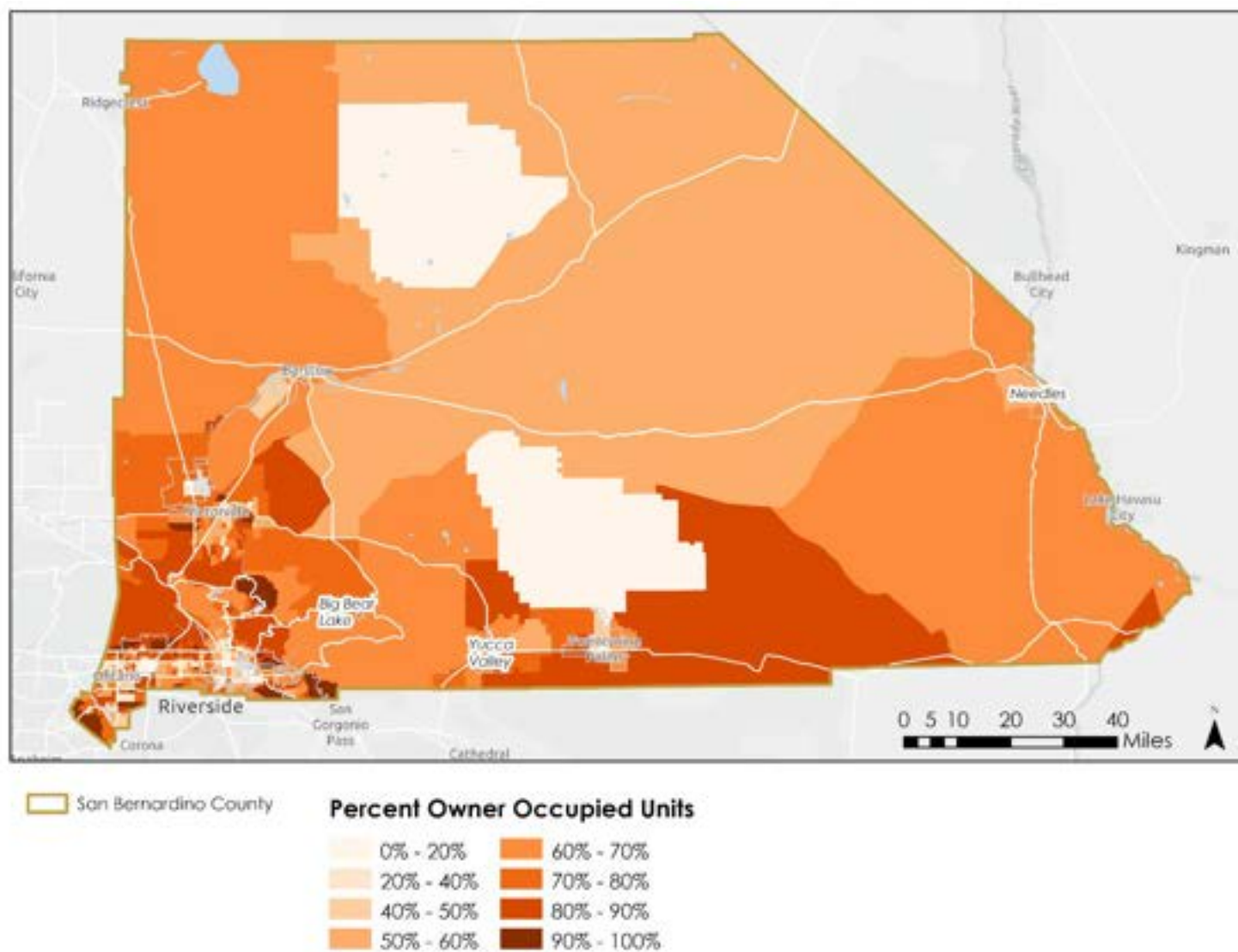
Data Source: 2018-2022 ACS 5-Year Estimates

Mortgage Lending

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

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

The national 2023 HMDA data consists of information for 10 million home loan applications reported by 5,113 home lenders including banks, savings associations, credit unions, and mortgage companies.[36] HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income. 670 financial institutions reported HMDA data for San Bernardino County in 2023.

Applicants in San Bernardino County submitted a total of 33,748 home purchase loan applications in 2023. The following analysis looks at 18,259 applications in San Bernardino County in which the mortgage was applied for as a first lien, including conventional, FHA-insured, VA-guaranteed, and FSA / RHS-guaranteed loans for single-family homes. Within each record, some data variables are 100% reported— "Loan Type," "Loan Amount," and "Action Taken," for example—but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant may have declined to identify their sex, race, and/or ethnicity. Records for applications with missing race and ethnicity data are included in a separate category entitled "No Race or Ethnicity Given." This data does not include seller-financed loans.

Looking at first-lien applications completed in 2023, more than two in five applications in the county were completed by Hispanic or Latino applicants (7,846 applications, or 43.0% of all applications). White applicants and applicants of other races or who did not provide information about their race each made up about one-fifth of all completed applications (3,505 and 3,567 applications, or 19.2% and 19.5%, respectively). Asian/ Pacific Islander and Black applicants submitted 13.6% and 4.7% of applications, respectively (2,490 and 851 applications).

[36] Federal Financial Institutions Examination Council. "FFIEC Publishes 2023 Data on Mortgage Lending." July 11, 2024. https://www.ffiec.gov/press/pr071124.htm

The tables that follow show loan approval rates for completed loan applications by race and ethnicity at various income levels in San Bernardino County.[37] The Median Family Income in the Riverside-San Bernardino-Ontario, CA HUD Metro FMR Area is $94,500, according to HUD's FY 2023 Income Limits. The income tiers below represent low-income applicants earning up to 80% AMI ($75,600), middle-income applicants earning 80% to 120% AMI ($75,600 to $113,400), and high-income applicants earning more than 120% AMI (over $113,400). In 2023, there were 85 applications for which income was not reported. These applications are included in the totals under "all applicants." Excluded from these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

Mortgage Denials

HMDA data indicates that 11.4% of first-lien mortgage applications for single-family homes in the county were denied in 2023. 23.7% of all applications from low-income earners were denied. Among middle-income earners, 12.3% of applicants were denied a loan, and 8.5% of applications from high-income earners were denied.

Looking at these figures by race and ethnicity, Hispanic, White, and Asian/ Pacific Islander applicants all had similar rates of denial (10.9%, 10.1%, and 9.6%, respectively). Black applicants were denied mortgages at a significantly higher rate (20.2%) than the county's average rate of 11.4% and were about twice as likely to be denied a loan as Hispanic, white and Asian/ Pacific Islander applicants.

Low-Income Applicants

23.7% of low-income mortgage loan applicants were denied a mortgage loan. Low-income applicants identifying as Black experienced a disproportionate rate of mortgage loan denial (34.0%). Asian/ Pacific Islander applicants were denied a mortgage at the lowest rates of all low-income applicants (18.8%).

Middle-Income Applicants

Middle-income applicants, earning between 80% to 120% MFI, were denied mortgages at a rate of 12.3%. At this income level, Black applicants were denied at a higher rates (21.9% were denied a loan), while white households were least likely to be denied (9.3%).

High-Income Applicants

At high incomes, 8.5% of applicants experienced a mortgage loan denial. At this income level, Black applicants experienced denials at the highest rates (15.5%), while Hispanic/Latino and white applicants had the lowest rates of denial (7.8% and 7.9%, respectively).

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[37] The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle-income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

Reasons for Denial

Reasons for denial are shown in Table 13. Hispanic applicants had the largest number of denials (850), followed by applicants of other races or whose race was not provided (451), and white applicants (353). The primary reason for mortgage loan denial was debt-to-income ratio (849 applicants). Other frequent reasons for loan denial include collateral (318 applicants), credit history (229 applicants), and incomplete credit application (206 applicants).

These findings indicate disparities in access to mortgage loans in the service area, particularly for Black applicants. Denials based on a high debt-to-income ratio and credit history indicate that many applicants struggle with long-term financial instability, which creates additional barriers to accessing a mortgage. Denials based on collateral indicate that the value of a requested loan is high relative to the appraised value of a home, creating loan-to-value ratios that fall above lenders' thresholds. The data suggests that additional resources are needed to stabilize the path to homeownership, including support for homebuyer readiness classes or other pre-application assistance, down payment assistance programs, and wider-ranging social support for households to improve their chances of securing mortgage loans.

TABLE 12. Loan Approval Rates by Race and Ethnicity in San Bernardino County

Applicant Home	APPLICANT RACE AND ETHNICITY					
	White	Black	Asian / Pacific Islander	Other/ Race Not Available	Hispanic/ Latino	All Applicants
LOW INCOME						
Completed Applications	460	106	202	374	995	2,137
Denial Rate	21.3%	34.0%	18.8%	28.3%	22.9%	23.7%
MIDDLE INCOME						
Completed Applications	777	269	356	801	2,505	4,708
Denial Rate	9.7%	21.9%	16.9%	13.7%	11.1%	12.3%
HIGH INCOME						
Completed Applications	2,223	458	1,583	2,055	4,249	10,568
Denial Rate	7.9%	15.5%	8.0%	9.6%	7.8%	8.5%
ALL APPLICANTS						
Completed Applications	3,505	851	2,490	3,567	7,846	18,259
Denial Rate	10.1%	20.2%	9.6%	12.6%	10.9%	11.4%

Data Source: FFIEC 2021 Home Mortgage Disclosure Act Data, Accessed via https://ffiec.cfpb.gov/data-browser/data/2021?category=states.

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

TABLE 13. Reasons for Loan Denial by Applicant Race and Ethnicity in San Bernardino County

Applicant Income	Applicant Race and Ethnicity				Latino/ Hispanic	All Applicants
	Non-Latino					
	White	Black	Asian/ Pacific Islander	Other/ Race Not Available		
Denial Reason Provided						
Debt-to-income ratio	132	81	92	186	358	849
Employment History	15	1	4	6	21	47
Credit history	25	19	39	48	98	229
Collateral	66	26	20	61	145	318
Insufficient cash (down payment, closing costs)	22	6	16	29	45	118
Unverifiable information	27	13	18	39	52	149
Credit application incomplete	42	15	30	38	81	206
Mortgage insurance denied	0	0	0	1	0	1
Other	24	9	20	43	59	155
Reason not reported	0	2	1	0	0	3
Total denials	**353**	**172**	**240**	**451**	**859**	**2,075**

Data Source: FFIEC 2023 Home Mortgage Disclosure Act Data, Accessed via https://ffiec.cfpb.gov/data-browser/

PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

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

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

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.[38]

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many

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[38] Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

states revising their allocation formulas to discourage this pattern in new developments.[39] The reasons for clustering of HCVs are more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.[40] This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

Supply and Occupancy

The Housing Authority of the County of San Bernardino (HACSB) is responsible for the administration of publicly supported housing in the jurisdiction to house families, the elderly, and people with disabilities. The table below presents numbers of publicly supported housing in the county according to HUD's 2023 A Picture of Subsidized Housing (APSH) data. The HACSB's most recent 2025 Moving to Work (MTW) Annual Plan provides additional context, noting that there is only one (1) Public Housing unit left in the housing authority's inventory, along with 2,621 Project-Based Vouchers and 9,583 Housing Choice Vouchers (HCVs).

Subsidized housing units are also available through the state's Low Income Housing Tax Credit (LIHTC) program, which provides housing units to renters earning no more than 60% AMI. Out of a total of 11,606 LIHTC-funded units, 10,918 are set aside for low-income households (approximately 94%). All together, these publicly supported housing programs account for approximately 3.8% of the county's total housing stock.

TABLE 15.
Housing Units by Program Category for San Bernardino County

Housing Units	San Bernardino County		Occupancy Rate
	# of units	% of total housing	
Public Housing	53	0.0%	92%
HCV Program	11,654	1.6%	90%
Project-Based Section 8	3,029	0.4%	94%
LIHTC Program	11,606	1.6%	N/A

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

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

| Housing Units | San Bernardino County | | Occupancy Rate |
	# of units	% of total housing	
Other Multifamily	1,129	0.2%	100%
TOTAL HOUSING UNITS	**731,899**	**100.0%**	**8.7%**

Data Source: 2020 Decennial Census H1 & H3; 2023 A Picture of Subsidized Housing; HUD User LIHTC Database

Table 16 shows the racial and ethnic composition of publicly supported housing units, as well as estimates for the numbers of low-to-moderate income households in the county's service area. Data provided in the table portrays how closely the publicly supported housing residency rate of several racial and ethnic groups compares to their share of the general population.

To qualify for housing assistance, applicants must meet HUD established income limits that are determined annually. Extremely low-income households earning less than 30% of area median income (AMI) or the federal poverty level, along with very low-income households earning less than 50% of AMI automatically qualify for assistance, while low-income households earning less than 80% of AMI may qualify if they meet other eligibility criteria.

As depicted in the table below, residents of publicly supported housing in San Bernardino County are overwhelmingly Black or African American. While Black residents comprise only 8% of the County's total population, they make up 15% of low-income renters and 44% of publicly supported housing residents within the county. Hispanic residents comprise the majority of the county's population (54%) and its low-income renters (51%). However, they are underrepresented in publicly supported housing, making up one-third (33%) of residents. White residents' share of low-income renters is almost identical to their share of the total population at 25% and 26% respectively, but they make up only 15% of publicly supported housing residents. The percentage of Asian residents in publicly supported housing (7%) is similar to their share of the total population (8%) and slightly higher than their share of low-income renters (5%). This data indicates that Black residents in the county are disproportionately impacted by low earnings and housing affordability in comparison to residents of other races and ethnicities.

TABLE 16.
Publicly Supported Housing Residents and Low-Income Renters by Race / Ethnicity

Housing Type	RACE / ETHNICITY							
	White		Black		Hispanic		Asian/Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	33	69%	1	2%	12	25%	N/A	N/A
Project-Based Section 8	428	15%	741	26%	1,169	41%	399	14%
HCV Program	1,688	15%	5,850	52%	3,375	30%	338	3%
Other Multifamily	139	12%	118	10%	517	46%	291	26%
TOTAL OF PUBLICLY SUPPORTED RESIDENTS	**2,287**	**15%**	**6,709**	**44%**	**5,072**	**33%**	**1,027**	**7%**
0 to 30% AMI Renters	13,070	25%	9,585	18%	24,065	46%	3,235	6%
31 to 50% AMI Renters	11,000	24%	7,350	16%	23,535	51%	2,585	6%
51% to 80% AMI Renters	14,315	26%	6,355	12%	29,520	55%	2,345	4%
TOTAL OF LOW-INCOME RENTERS	**38,385**	**25%**	**23,290**	**15%**	**77,120**	**51%**	**8,165**	**5%**
TOTAL OF SAN BERNARDINO COUNTY RESIDENTS	**566,113**	**26%**	**173,322**	**8%**	**1,170,913**	**54%**	**176,204**	**8%**

Source: 2020 Decennial Census P2; CHAS Table 1; 2023 APSH

Note: Numbers of publicly supported housing residents represent individuals, while numbers of low-income households represent households. Publicly supported housing categories are shown as a percentage of total publicly supported housing residents, while low-income renter categories are shown as a percentage of all renter households.

Geography of Supported Housing

The figures below depict the geographies of publicly supported housing within San Bernardino County using 2023 APSH data. Figure 34 below indicates a concentration of publicly supported housing in the southeastern portion of the county, including the cities of San Bernardino, Victorville, Ontario, Rancho Cucamonga, and Fontana. Other areas with publicly supported housing activity include Needles, Barstow, Yucca Valley, and Twentynine Palms. The graduated colors of yellow to black indicate the percentage of households in a tract with a Housing Choice Voucher (HCV). Locations of publicly supported housing and Low-Income Housing Tax Credit (LIHTC) developments are indicated by dots.

This dataset indicated the location of 2 public housing developments in the county, with one scattered site development in Apple Valley operated by the HACSB and one development in Needles with 52 total units operated by the Housing Authority of the City of Needles. Section 202 Supportive Housing for the Elderly developments are concentrated in San Bernardino (approximately 40%) and surrounding southeastern portion of the county. There is one (1) Section 811 Supportive Housing for Persons with Disabilities in the county: San Emi apartments in Montclair, which offers 18 units of affordable housing. Project-Based Section 8 developments and LIHTC developments are more evenly dispersed throughout the county.

Housing Choice Voucher usage follows the general pattern described above, with Tract 64.01 in central San Bernardino City exhibiting the highest HCV usage, with over 55% of households using HCVs. Two other tracts in the county— Tract 95.01 in Barstow and Tract 8.08 in Upland— have a percentage of HCV households greater than 25%.

FIGURE 34.
Publicly Supported Housing in San Bernardino County
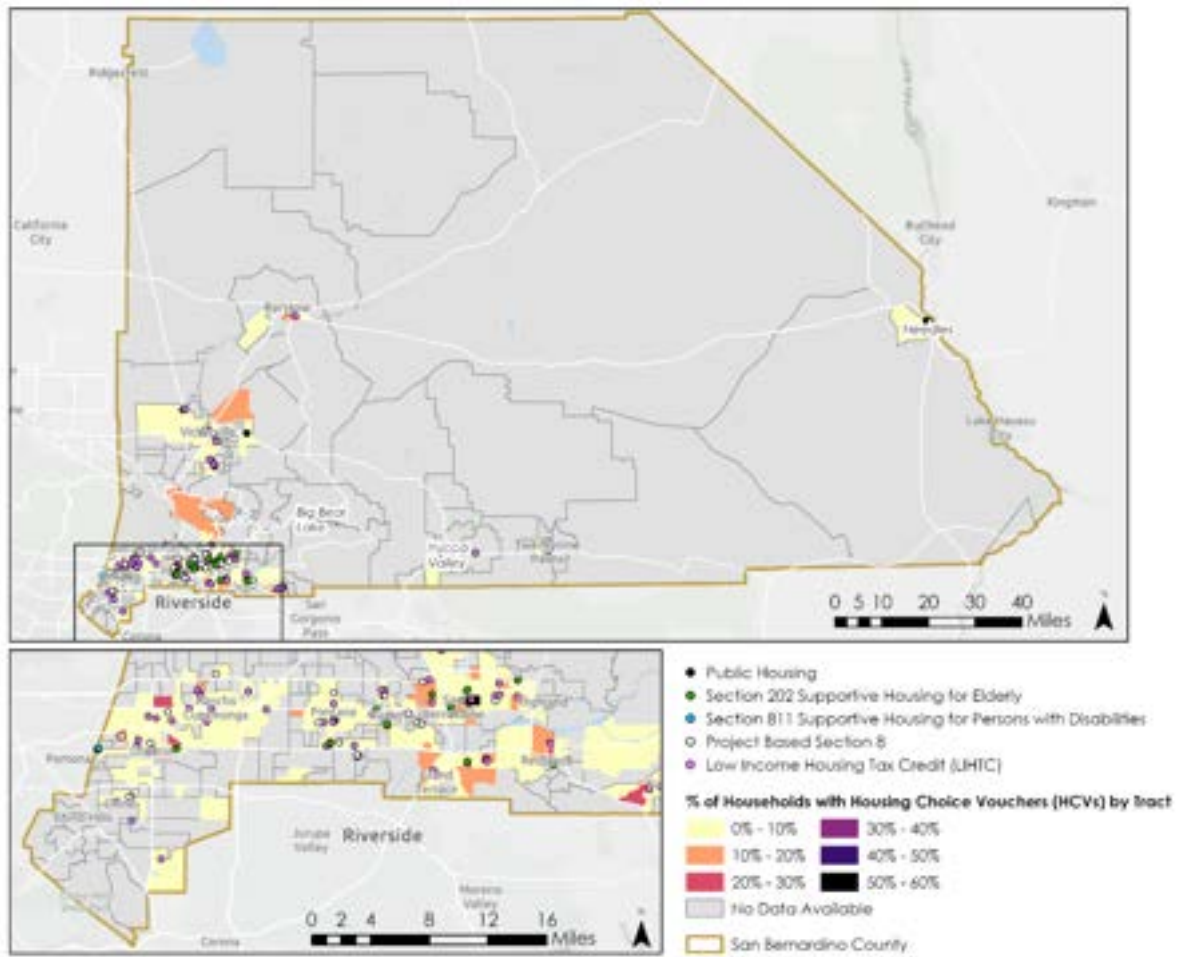
Source: 2023 APSH, 2024 LIHTC

HOUSING FOR PEOPLE WITH DISABILITIES

According to the American Community Survey, 13.0% of the nation's noninstitutionalized population reported having a disability in 2021. Research has found that the U.S. generally has an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development estimates that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.[41]

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

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

In San Bernardino County, an estimated 243,952 persons have a disability, representing 11.4% of the total population. Seniors (age 65 or older) have the highest disability rate at 37.0%. In contrast, 9.4% of those aged 18 to 64 and 4.4% of children under age 18 have a disability. These rates track closely with those of the greater MSA region, where 11.5% of residents have a disability, including 35.9% of seniors and 4.2% of youth.

Ambulatory difficulties are the most common type in both the county and the MSA, affecting 6.1% of county residents and 6.2% of the MSA's population. Cognitive and independent living disabilities are the next most common disabilities, impacting approximately 5% to 6% of the population in both geographies. Hearing and vision difficulties are the two least common disability types in the county, each affecting approximately 3% or less of the population.

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

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

TABLE 17.
Disability by Type in San Bernardino County

Disability Type	San Bernardino County		Riverside-San Bernardino-Ontario, CA MSA	
	#	%	#	%
Hearing Difficulty	63,994	3.0%	142,521	3.1%
Vision Difficulty	50,520	2.4%	105,810	2.3%
Cognitive Difficulty	98,920	5.0%	203,811	4.8%
Ambulatory Difficulty	121,198	6.1%	262,675	6.2%
Self-Care Difficulty	55,121	2.8%	117,774	2.8%
Independent Living Difficulty	90,876	5.8%	197,256	5.8%
Total Population with a Disability	243,952	11.4%	523,698	11.5%

Source: 2018-2022 5-Year American Community Survey, Table S1810.
NOTE: All % represent a share of the total population within the jurisdiction or region.

TABLE 18.
## Disability by Age Group in San Bernardino County

Age of People with Disabilities	San Bernardino County		Riverside-San Bernardino-Ontario, CA MSA	
	#	%	#	%
Under Age 18 with Disabilities	24,765	4.4%	48,337	4.2%
Age 18 to 64 with Disabilities	124,670	9.4%	255,932	9.2%
Age 65+ with Disabilities	94,517	37.0%	219,429	35.9%

Source: 2018-2022 5-Year American Community Survey, Table S1810.
NOTE: All % represent the share of the population within the specified age group with a disability.

The percentage of the population with a disability is represented in the figure below by census tract, ranging from 0% to 100% on a gradient scale. This analysis identified census tract 9801 with a 100% disability rate. However, this tract is comprised of the San Bernardino International Airport and reports a total population of one person. Other areas with disability rates of 25% or more include areas near Big Bear Lake, Needles, Victorville, Chino, and central San Bernardino City.

Figure 35.
Percent of Population with a Disability by Census Tract in San Bernardino County
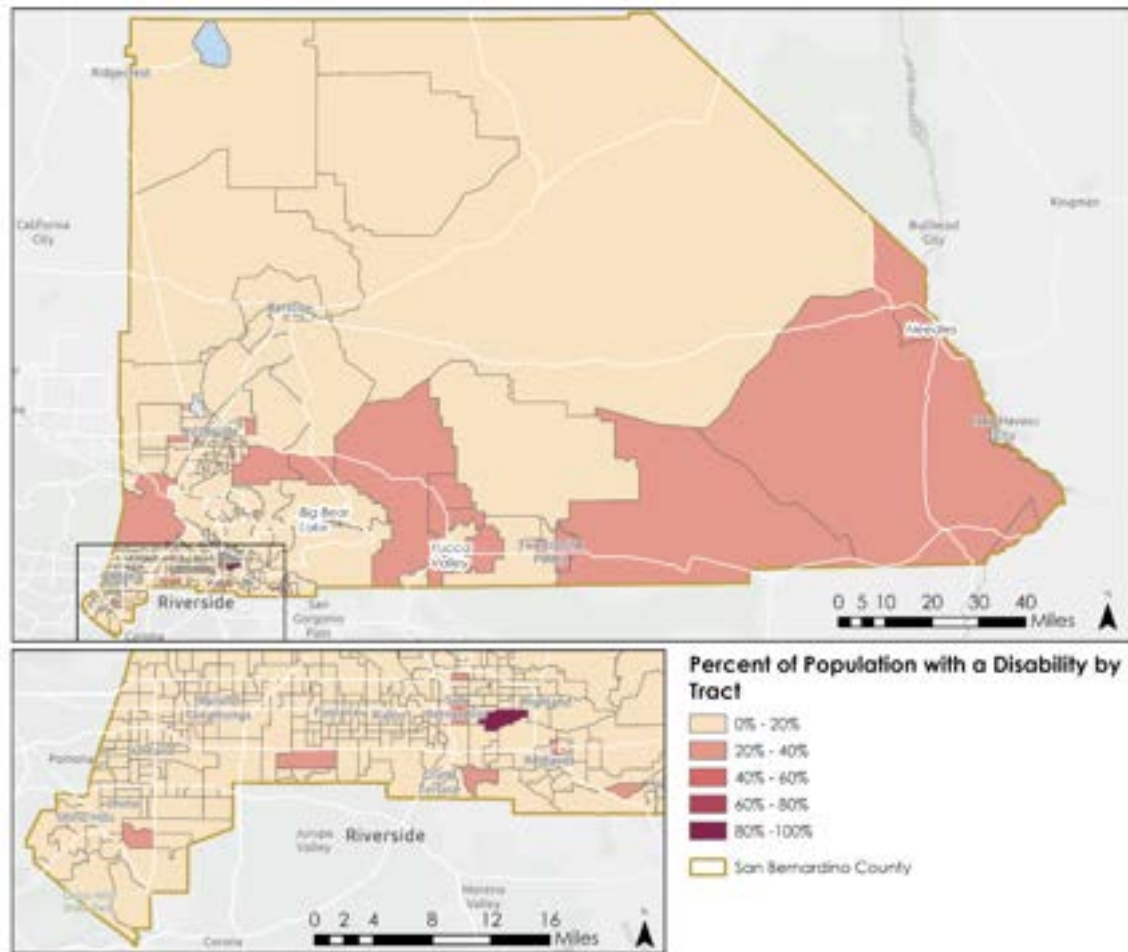
Accessible Housing Supply and Affordability

Any new multifamily housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision/hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. The locations of these developments are visualized in the map below indicating one Section 811 property and 15 Section 202 properties within the County.

The Section 202 properties include:

- Montclair Senior Housing
- Ontario Senior Housing Inc.
- D Street Senior Housing
- John Piazza Apartments
- Telacu Tierra Serrano
- Telacu Rio Alto
- Telacu La Paz
- San Bernardino Senior Housing
- Telacu Sierra Vista
- Telacu Monte Vista
- Telacu Hacienda
- Ahepa 302 Apartments
- Telacu Buena Vista
- Telacu La Amistad

The Section 811 property is San Emi, which is an 18-unit apartment community in the City of Montclair designed and built for adults with developmental disabilities with wraparound services.

Figure 36.
Section 202 and 811 Developments in San Bernardino County
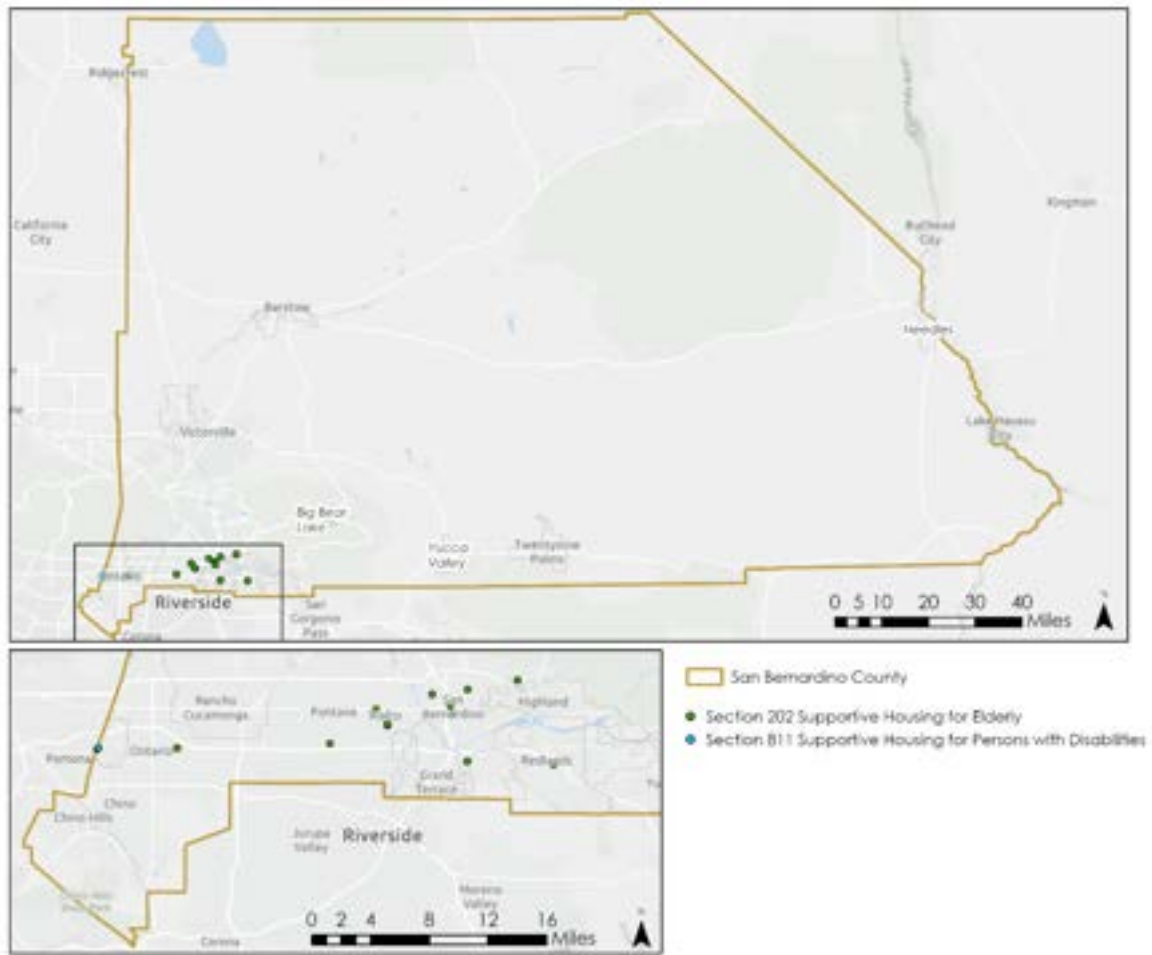
Data Source: 2023 APSH

Based on a standard Supplemental Security Income (SSI) payment of $967 per month (equating to an affordable rent of $290 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities.

The share of residents with a disability in various types of publicly subsidized housing in San Bernardino County and the region are shown below. In all but the Housing Choice Voucher program, households containing one or more disabled residents are underrepresented relative to their share of the total population. While 11.0% of county residents have a disability, disabled households occupy 22% of public housing units, 22% of HCV households, 11% of Project-Based Section 8 units, and just 2% of the county's Section 202 units for the elderly.

TABLE 19.
Disability by Housing Program Category in San Bernardino County

Housing Type	San Bernardino County	Riverside-San Bernardino-Ontario, CA MSA
	%	%
Public Housing	22%	22%
Project-Based Section 8	11%	9%
Section 202	2%	2%
Section 811	89%	72%
HCV Program	22%	24%

Source: 2023 APSH.
NOTE: The definition of "disability" used by the Census Bureau in tables above may not be comparable to reporting requirements under HUD programs.

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

The outsized shares of Housing Choice Voucher and public housing households that include people with disabilities suggests that this housing comprises a significant component of the area's supply of affordable

and accessible housing. However, the HCV program relies on housing units supplied by the private market, which this analysis has shown frequently involves waiting lists and minimal or inconsistent accessibility features. It is clear that the need for accessible housing options in San Bernardino County is not met by the current supply. Stakeholder input supports this finding, noting that there is a need for affordable senior housing and accessible retirement communities with quality housing and amenities. Furthermore, 55.8% of respondents to the public survey conducted in conjunction with this analysis indicated a high need for additional housing accessible to people with disabilities.

Zoning and Accessibility

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units. These laws prohibit these jurisdictions from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. This includes a local government's affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to access housing. It also includes the affirmative obligation not to segregate housing for protected classes into lower-opportunity, less desirable areas of the jurisdiction. Conditions of San Bernardino County's zoning code impacting accessibility are assessed in the following sections.

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

It is common for local governments to use their zoning code's definition of "family" to limit the number of unrelated persons who may live together in a single dwelling as a means of preserving the stable, traditional, and residential character of their neighborhoods. However, unreasonably restrictive definitions may limit housing for nontraditional families, who in every sense but a biological one, share the characteristics of a traditional family related by blood or marriage. Restrictive definitions of family also may have the effect of limiting fair housing choice for persons with disabilities who reside together in supportive or congregate living situations. San Bernardino County's zoning code are very permissive, defining of "family" to "one or more persons living together in a dwelling unit" rather than an arbitrary number of persons. The full definition is:

One or more persons living together in a dwelling unit, with common access to, and common use of all living, kitchen and eating areas within the dwelling unit.

The County's zoning ordinance identifies community care facilities as the primary supportive housing type for persons with disabilities, defined as intermediate facilities that include provisions for developmentally disabled habilitative - nursing or congregate living. The County follows California state law's directives under the Health and Safety Code to protect housing for persons with disabilities from exclusionary zoning criteria. State law requires that licensed community care facilities serving six (6) or fewer persons be: (1) treated as a residential use, (2) allowed by right in all residential zones, and (3) treated the same with respect to regulations, fees, taxes, and permit processes as other residential uses in the same zone. This

protection applies to community care facilities for persons with disabilities, to residential care facilities for the elderly, to alcoholism or drug abuse recovery or treatment facilities, and to congregate care facilities.

Reasonable Accommodations

Chapter 19.63 of San Bernardino County's zoning ordinance establishes and outlines the procedures for persons with disabilities seeking to request reasonable accommodations to allow equal access to housing as set forth by the Federal Fair Housing Act of 1988 and the California Fair Employment and Housing Act. The procedures allow for requests for reasonable accommodations to be made in writing by an individual with a disability or his or her representative, or a developer or provider of housing for an individual with a disability. The request shall:

- identify the project
- the standard that presents a barrier to reasonable accommodation
- the disability that requires reasonable accommodation

The County's Land Use Director may request additional information necessary for making a decision. Prior to issuance of permits issued for construction including a reasonable accommodation, the Director may require recordation of a disclosure to inform future property owners of the granting of the reasonable accommodation, and whether or not the approval will run with the land. The Director has the authority to review and approve or deny requests for reasonable accommodation, based on the required findings. The Director may refer the matter to the Planning Commission or the Historic Preservation Commission if the project requires another discretionary action, or as appropriate.

Requests for reasonable accommodations will be granted if all of the following findings are made:

1. The subject housing will be used by an individual with a disability as defined under the Acts.
2. The requested accommodation is necessary to make specific housing available to an individual with a disability.
3. The requested accommodation would not impose an undue financial or administrative burden on the City.
4. The requested accommodation would not require a fundamental alteration in the nature of a City program or law, including land use and zoning.

FAIR HOUSING ACTIVITIES

Fair Housing Rights and Resources

The federal Fair Housing Act—Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the "FHA" or "FHAA")—protects persons from unlawful discrimination in the sale, rental, financing, advertising, and insurance of dwellings, and from actions or conditions that would otherwise deny or make housing unavailable on an equal basis because of a person's race, color, national origin, religion, sex,[43] disability (mental or physical), or familial status (families with children). The FHA also makes it illegal to retaliate against someone who files a complaint, testifies, or assists in a fair housing proceeding. The FHA applies broadly to private, public, and subsidized dwellings though it contains some limited exemptions for certain single family home sales by owner, owner-occupied buildings of four or less units, religious and private clubs, and qualifying age-restricted housing for older persons. Specific to protections based on disability, the FHA requires housing providers to allow reasonable modifications to premises and reasonable accommodations to rules and policies, and it requires "covered multifamily housing" (generally meaning ground floor units in buildings with four or more units or all units in buildings of four or more units serviced by an elevator and constructed after March 13, 1991) to meet minimum standards of accessible design and construction.

Federal law sets the minimum standards for fair housing rights and enforcement but does not preclude state legislatures and local county and city governing bodies from expanding the classes of protected persons and fair housing rights via state fair housing and antidiscrimination laws or county and city ordinances. While San Bernardino County has not adopted its own fair housing ordinance for the purposes of expanding or enforcing fair housing rights on a local level, it has codified a reasonable accommodation ordinance to provide individuals with disabilities a standardized administrative process to request "reasonable accommodation in the application of the County's rules, policies, practices and procedures, as necessary to ensure equal access to housing." (CODIFIED ORDINANCES OF THE COUNTY OF SAN BERNARDINO §84.31.010—090.)

California's counterpart to the text of the federal Fair Housing Act is codified in its Fair Employment and Housing Act ("FEHA") (CAL. GOV. CODE § 12900 - 12996, as amended) and has been certified by

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[43] HUD issued a guidance memorandum on February 11, 2021, clarifying that the FHA's sex discrimination provisions include discrimination because of sexual orientation and gender identity, which were already explicitly protected by the FEHA.

HUD as substantially equivalent to the FHA in rights, procedures, remedies, judicial review, and enforcement. Substantial equivalence certification qualifies the state fair housing enforcement agency—the California Civil Rights Department—for HUD-subsidized enforcement funding via grants, reimbursements, technical support, and cooperative and work-share agreements through HUD's Fair Housing Assistance Program (FHAP). With regard to housing, the California FEHA prohibits discrimination and harassment on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), national origin, familial status, and disability like the FHA but has expanded the protected classes to include also gender, gender identity, gender expression, sexual orientation, marital status, military or veteran status, ancestry, source of income, genetic information, retaliation for protesting illegal discrimination, and "any other basis prohibited by Section 51 of the Civil Code [the UNRUH CIVIL RIGHTS ACT]," meaning because of a person's medical condition, age, citizenship, primary language, or immigration status. California's Unruh Civil Rights Act protects all persons against arbitrary and unreasonable discrimination by a "business establishment" and consistently has been construed to apply to rental housing. A claim under the Unruh Act often is an additional claim averred in housing discrimination cases. California's FEHA has a broader definition of "disability" than the federal FHA. In California, disability includes physical or mental impairments that "limit a major life activity" as opposed to the federal definition which requires that the disabling condition *substantially* limits one or more major life activities.

The FEHA broadly prohibits discrimination and harassment in all aspects of housing, including sales and rentals, advertising, construction, evictions, terms and conditions, tenant screening, mortgage loans and insurance, restrictive covenants, municipal services, and land use and zoning. California's fair housing law has fewer exemptions than the FHA. One of the few exemptions applies to an owner-occupied single-family home, where the owner does not rent to more than one individual (as opposed to owner-occupied buildings with no more than four units under the FHA), and the owner complies with FEHA's prohibition against discriminatory statements, notices, or advertisements. Exemptions also apply to housing operated by organizations and private clubs that limit occupancy to members only and to statements indicating a preference for same-sex roommates in shared living situations. The FEHA explicitly prohibits discriminatory "public or private land use practices, decisions and authorizations" including, but not limited to, "zoning laws, denials of permits, and other [land use] actions . . . that make housing opportunities unavailable" to protected groups. (CAL. GOV. CODE § 12955). Like the FHA, the FEHA requires housing providers to make reasonable accommodation in rules and practices to permit persons with disabilities to use and enjoy a dwelling and to allow persons with disabilities to make reasonable modifications of the premises to ameliorate the effects of a disability. The FEHA prohibits covered entities from retaliating against any person because the person opposed practices forbidden by the FEHA, exercised rights under the FEHA, or filed a complaint, testified, or assisted in any administrative or court proceeding related to an FEHA claim.

The California Civil Rights Department (renamed as of July 1, 2022 by SB 189, from the previously named Department of Fair Employment and Housing), created by the state legislature and certified

by HUD as a participating FHAP agency, partners with HUD to enforce federal and state fair housing laws, including for residents of San Bernardino County. The CRD is empowered to receive or initiate complaints alleging a discriminatory housing practice; investigate claims and issue subpoenas; conduct voluntary pre-investigation mediation or compel parties to participate in mandatory dispute resolution if an investigation finds reasonable cause to believe that discrimination has occurred; file a civil action to seek a temporary restraining order or other order granting preliminary or temporary relief pending the final investigative determination of a complaint; file a civil lawsuit in court to seek relief on behalf of an aggrieved complainant or to vindicate the public interest where it is unable to obtain voluntary compliance; or refer a case to the state attorney general to file a civil action where there is reasonable cause to believe a person has engaged in a pattern or practice of violating protected housing rights or where a denial of protected housing rights raises an issue of general public importance. The CRD also provides education and training to the public including to both landlords and tenants regarding their civil rights and responsibilities; provides free conflict resolution services; reviews thousands of housing advertisements to remove unlawful statements such as "No Section 8;" and runs a fair housing testing program. The Civil Rights Council, which is part of the Civil Rights Department, promulgates administrative regulations that implement California's civil rights laws, including the housing discrimination complaint process. (CAL. CODE OF REGULATIONS, Title 2 § 10000 et seq.)

Recent Legislative and Regulatory Updates to Fair Housing Rights

Until recently, "source of income" was defined narrowly under the FEHA as "lawful, verifiable income paid directly to a tenant or paid to a representative of a tenant" and under the definition "a landlord is not considered a representative of a tenant." Accordingly, source of income under the FEHA was adjudged to not include government rent subsidies, specifically Housing Choice Vouchers under Sec. 8 of the FHA. *See* SABI v. Sterling, 183 Cal. App. 4th 916 (2010). In a recent case, the California Court of Appeals found, however, that a local ordinance that specifically protects against discrimination based on a tenant's participation in the Section 8 program is not preempted by the state law. *See* City & Cnty. of San Francisco v. Post, 231 Cal.Rptr.3d 235, 22 Cal.App.5th 121 (2018). This opened up the option for cities to more explicitly protect their residents from discrimination based on housing subsidies but did not resolve the issue under state law.

To correct the loophole, the state redefined the FEHA's definition of "source of income" (SB 329, GOV. CODE §§ 12927 and 12955) as part of a package of major housing laws passed by the California legislature and signed by Governor Gavin Newsom in 2019—including the Housing Crisis Act of 2019 and the Tenant Protection Act of 2019. The definition of "source of income" now more explicitly protects:

> lawful, verifiable income paid directly to a tenant, or to a representative of a tenant, or paid to a housing owner or landlord on behalf of a tenant, including federal, state, or local public

assistance, and federal, state, or local housing subsidies, including, but not limited to, federal housing assistance vouchers issued under Section 8 of the United States Housing Act of 1937.

The law aims to protect the approximately 300,000 low-income Californians who rely on rental assistance payments through voucher programs to secure stable housing. Source of income also may include Veterans Affairs Supportive Housing vouchers ("VASH vouchers"), disability payments, Social Security income, court-ordered child support, COVID-19 Rent Relief Program financial assistance, etc. Effective January 1, 2020, housing providers and landlords in California cannot advertise a preference for tenants with certain sources of income or refuse to rent, require a condition or restriction in the terms of rental, or otherwise discriminate against someone because the prospective tenant has a housing subsidy under Section 8 Housing Choice Vouchers, the HUD-VASH program (assistance to veterans), Homelessness Prevention and Rapid Re-Housing Programs, Housing Opportunities for Persons with AIDS, or security deposit assistance programs, among others. This list of protected subsidies also includes locally funded subsidy programs created by cities, counties, and public agencies to address California's growing homelessness.

Other legislative and regulatory amendments and updates to fair housing rights and procedures, effective 2019-2024, include:

- AB 1497, CAL. GOV. CODE § 12927, housing offered for rent on online hosting platforms, including services like *Airbnb* and *HomeAway*, is included in the FEHA's definition of "housing accommodation."
- SB 222 veteran and military status added as protected classes under the fair housing provisions of the FEHA (a protection already contained in the employment section of the Act). SB 222 also removed the exception that allowed landlords to turn away tenants who hold Veterans Affairs Supportive Housing vouchers (VASH vouchers).
- SB 807, CAL. GOV. CODE § 12930, 12946, 12960, 12961, 12962, 12963.5, 12965, 12981, and 12989.1, clarifies the deadlines by which a complainant must file an administrative complaint with the Department; clarifies that the statute of limitations for filing a civil action under any law enforced by the CRD is tolled pending the investigation and dispute resolution process.
- AB 1466, CAL. GOV. CODE § 12956.1, 12956.2, 27282, and 27388.1, updates and clarifies the procedures for removing unlawful, discriminatory covenants or restrictive language from real property documents including the duties of county recorders, title insurance companies, escrow companies, real estate brokers, and real estate agents or associations.
- AB 3088 provided protections against evictions and foreclosure to tenants and property owners facing financial hardship due to COVID-19.
- AB 1766, CAL. GOV. CODE § 12926, prohibits housing providers and others from discriminating based on a person holding or presenting a restricted ID card for eligible undocumented Californians.

- SB 649, CAL. GOV. CODE § 7061, 7061.1, and 7061.2, allows local governments to institute a local anti-displacement tenant preference in affordable housing projects and to utilize tax credits and tax-exempt bonds to finance those projects.
- SB 267, CAL. GOV. CODE § 12955, prohibits, in instances where an applicant for housing has a government rent subsidy, the use of that applicant's credit history as part of the application process without offering the applicant the option of providing other specified evidence of their reasonable ability to pay the rent and reasonably consider that evidence.
- AB 1620, CAL. GOV. CODE § 1954.53, allows a city to require an owner of a rent-controlled unit to allow a tenant with a permanent physical disability to relocate to an available comparable or smaller unit located on an accessible floor of the property and retain their lease at the same rental rate and terms if the move is determined to be necessary to accommodate the tenant's mobility disability and the new unit is in the same building or on the same parcel with at least four other units.

In 2022 and 2023, the Civil Rights Council, whose duties include promulgating regulations that implement California's civil rights laws, finalized updates to its fair housing regulations (CAL. CODE OF REGULATIONS, Title 2, Div 4.1) addressing important topics such as source income discrimination; guidance regarding reasonable modifications; discriminatory advertising and statements; use of criminal history information in housing decisions; and the application of FEHA with respect to shelters for survivors of interpersonal violence. The administrative regulations also were revised to reflect the Council's and CRD's name change.

Local FHIP Grantees

Under its Fair Housing Initiatives Program (FHIP), HUD administers multiple competitive grant categories to award money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

- ➢ The **Fair Housing Organizations Initiative (FHOI)** provides funding to start new housing advocacy organizations in underserved communities or build the growth, capacity, and effectiveness of existing non-profit fair housing organizations to continue to serve the rights and needs of underserved groups, particularly persons with disabilities.
- ➢ The **Private Enforcement Initiative (PEI)** funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

➢ The **Education and Outreach Initiative (EOI)** funds programs and initiatives that educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

Inland Fair Housing & Mediation Board

Inland Fair Housing & Mediation Board (IFHMB) is a nonprofit serving residents of San Bernardino County and parts of Riverside and Imperial Counties in Southern California. Since 1980, IFHMB has helped low-income, senior, and other vulnerable clients resolve issues related to housing discrimination, homeownership sustainability, rental complaints, and eviction disputes through education and counseling, mediation and alternative dispute resolution, legal representation, and advocacy. With offices in Ontario, Victorville, and El Centro, IFHMB assists thousands of individuals each year through its programs.

IFHMB's fair housing department investigates complaints of housing discrimination, advocates on behalf of victims, and seeks resolution of claims through conciliation or referral to HUD or the CRD. IFHMB also offers fair housing workshops and presentations to educate housing providers, tenants, homeowners, city staff, and financial and lending institutions on fair housing laws, services, and resources.

Inland Fair Housing and Mediation Board has consistently been a FHIP grantee under both the PEI and EOI grant categories.

For FY2022—FY2024, IFHMB was awarded a $425,000 PEI multiyear grant. The organization also received EOI grants of $125,000 in FY20223 and in FY2022. In FY2021, IFHMB received a $350,000 PEI-ARP award to focus directly on the unequal impact the COVID-19 pandemic had on communities of color, low-income communities, and other vulnerable populations with activities and programs including responding to housing inquiries, investigating fair housing complaints, conducting fair housing testing, providing legal assistance, conducting education and outreach, and covering costs associated with providing services related to the pandemic. In FY2020, IFHMB received multiple FHIP funding awards, for $125,000 and for $360,000, plus an additional $20,000 EOI award under the CARES Act for education and outreach activities during this COVID-19 national emergency.

In response to interview questions regarding IFHMB's recent fair housing activities, the organization stated that some of the greatest needs it sees in San Bernardino County are education on fair housing laws and how residents can enforce their fair housing rights. IFHMB continues to provide fair housing education and fair housing enforcement services to meet demand for these services. IFHMB also recognizes there is a need for more accessible housing for person with disabilities and for affordable housing in areas of opportunity. Other than income/savings, language barriers may impact fair housing choice in the county.

Inland provided the following data for complaints it received and processed originating in San Bernardino County for 2019-2024:

Table 20. Basis and Disposition of Fair Housing Complaints Received by IFHMB 2019-2024

Basis of Discrimination Reported	Total FH Complaints	Disposition				
		Information	Mediated	Referred to Attorney	Referred to HUD / DFEH-CRD	Referred to PEI
Age	18	17	1	1	0	0
Arbitrary	19	19	0	4	0	1
Color	3	3	0	0	0	0
Disability	413	381	32	19	4	61
Familial Status	19	18	1	1	0	3
Marital Status	5	5	0	0	0	0
National Origin	18	18	0	0	1	1
Race	80	71	9	6	3	9
Religion	5	5	0	0	0	1
Sex	54	51	3	5	0	4
Sexual Orientation	10	9	0	0	0	0
Source of Income	43	40	3	2	4	5
Total	**687**	**637**	**50**	**38**	**12**	**85**

Disability was the most often cited basis of discrimination in complaints and inquiries received by IFHMB, in 60% of cases, followed by race in approximately 12% of cases, sex in 8% of cases, and source of income in 6% of cases. In most cases (93%), IFHMB provided information, education, or other resources to the client. In 12% of cases, the matter moved forward to the PEI enforcement and testing services of IFHMB; 7% of cases were resolved by mediation; 5.5% of matters were referred to an attorney; and about 2% of cases were referred to HUD or the CRD (formerly DFEH) for further investigation and processing.

Two administrative actions brought by IFHMB on behalf of protected persons in San Bernardino County are representative of the testing, enforcement, and advocacy activities made possible by FHIP funding:

- *Inland Fair Housing and Mediation Board v. National Community Renaissance et al.* **(HUD Case No. 09-20-1063-8/6);** *Inland Fair Housing Mediation Board v. Victorville Housing Partnership et al.* **(HUD Case No. 09-20-1000-8/6);** *Inland Fair Housing Mediation Board v. Cathedral Family Housing Partners LP et al.* **(HUD Case No. 09-20-1001-8/6); and** *Inland Fair Housing Mediation Board v. National Community Renaissance of California et al.* **(HUD Case No. 09-20-1066-8/6).**

On June 1, 2020, and June 9, 2020, IFHMB filed multiple complaints with HUD, based on testing investigation that showed that management agents and owners of four HUD-subsidized apartment complexes violated the FHA and Title VI of the Civil Rights Act (recipients of federal financial assistance) by refusing to rent to persons with Limited English Proficiency (LEP) based on national origin. Two of the four subject properties at issue are in the City of Victorville in San Bernardino County (and two others in Riverside County). IFHMB conducted fair housing tests which allegedly showed that on-site managers at the subject properties refused to rent to LEP persons and told Spanish speaking prospective tenants that they had to speak English in order to be added to tenant waiting lists. LEP prospective tenants also were allegedly told that they had to provide their own interpreters. The respondents denied the allegations but voluntarily agreed to settle the matter with HUD's mediation assistance before a final determination of a reasonable cause finding was issued.

Under the terms of the Conciliation/Voluntary Compliance Agreement, Respondents agreed to pay IFHMB $9,000; to attend fair housing training; and to comply with HUD's LEP Guidelines entitled "Final Guidance to Federal Financial Assistance Respondents Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," 72 FED. REG. 2732 (January 22, 2007). Respondents' properties also would be subject to monitoring and inspections by HUD to ensure ongoing compliance.

- *Inland Fair Housing & Mediation Board v. Edwin A Muradliyan Living Trust Pacific Diversified No. 4 LLC, et. al.* **(HUD Case No. 09-19-6700-8) (file date May 21, 2019; effective date of settlement agreement Jan. 14, 2020)**

IFHMB filed an administrative complaint with HUD alleging fair housing testing showed the property owners and managers of properties in Upland and Ontario in San Bernardino County refused to rent to families with children, offered them different lease terms and conditions, and/or implemented and enforced an unreasonably restrictive occupancy policy in violation of the FHA.

HUD helped mediate a Conciliation Agreement between the parties. The respondents denied all liability but agreed to pay IFHMB $10,000; have resident-facing employees attend fair housing training; remove its two-person-per-bedroom occupancy standard and instead determine occupancy

in compliance with the FHA; remove language regarding the two-person-per-bedroom policy from advertising and marketing materials; and be subject to monitoring by HUD to ensure ongoing compliance.

IFHMB can be contacted through their website or by phone:

Phone: (909) 984-2254
Web: ifhmb.com
Email: fairhousing@ifhmb.com or info@ifhmb.com

Fair Housing Complaints

A resident of San Bernardino County who believes he or she has been the victim of an illegal housing practice under the FHA or FEHA may seek assistance from HUD's Office of Fair Housing and Equal Opportunity (FHEO) or the CRD within one year of when the discriminatory practice occurred. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local FHAP agency for investigation, conciliation, and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency's closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because the CRD is a certified FHAP agency, most complaints filed with the HUD FHEO office will be dual-filed or referred back to the CRD for investigation and enforcement.

If HUD's FHEO receives and retains a timely-filed complaint (generally within one year of the alleged discriminatory act), it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the FHEO must prepare a final "Determination" report with a finding of either "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO makes a "no cause" finding, the case is dismissed. (The complainant would still have the opportunity to file a complaint in civil court and pursue remedies through the judicial process within two years of the last alleged discriminatory act.) If the FHEO finds "reasonable cause," it may issue a Charge of Discrimination and refer the case to HUD's Office of General Counsel to proceed to an administrative hearing before an Administrative Law Judge or refer the case to the Department of Justice to file a civil action in federal district court. The parties have the right to be represented by legal counsel, to present evidence, to cross-examine witnesses, and to conduct discovery of evidence. An ALJ may award the aggrieved party injunctive relief, actual damages, reasonable attorney's fees, and also impose civil penalties; but unlike federal district court, may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

The California FEHA provides an alternative procedure to the HUD/FHEO administrative complaint process. Persons who believe they have experienced housing discrimination may file a pre-complaint intake with the CRD. The Department accepts cases based on possible violations of the FEHA, the Unruh Civil Rights Act, the Ralph Civil Rights Act, the Disabled Persons Act, and the federal FHA under a work-sharing agreement with HUD. Complaints must be filed with the CRD within one year from the date of the alleged discriminatory act. If the complaint is accepted for investigation, the CRD has the authority to issue subpoenas and take depositions. Before the CRD issues a finding, it may facilitate voluntary dispute resolution through conciliation or mediation. If mediation fails but the investigation does not show a violation of the law, the Department will close the case. If through investigation, the CRD makes a reasonable cause determination, the opposing parties are required to participate in the department's mandatory dispute resolution to try to resolve the dispute without litigation. A no-fault resolution can be negotiated at any time during the process. If dispute resolution fails, the CRD's legal division will file a civil action in court—or refer the case to the state attorney general to file a civil action—on behalf of the aggrieved person for adjudication and possible remedies, including for cases involving the legality of any zoning or other land use law or ordinance. (Prior to an amendment to the FEHA passed in 2012, the Fair Employment and Housing Commission would hold an administrative hearing to hear evidence and decide the claims and remedies, but currently the matter must proceed from the Department's investigatory reasonable cause finding to a civil lawsuit.)

The advantages of seeking redress through the administrative complaint process are that the CRD/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up some control of the investigation, prosecution, and ultimate findings.

Public records requests were submitted to HUD's Office of Fair Housing and Equal Opportunity for Region IX and to the California Civil Rights Department for data reflecting complaints received by the respective agency of alleged housing discrimination occurring in San Bernardino County for the previous 5-year period. The requests also asked for information regarding any unresolved findings, lawsuits, enforcement actions, settlements, or judgments specifically involving the County, an incorporated city, or a local municipal agency as the respondent or complainant.

Complaints filed with HUD

The FHEO Regional Offices maintain county-level data reflecting the number of complaints of housing discrimination received by HUD, the status and closure reason of all such complaints, the basis/bases of discrimination and the discriminatory issues identified in each case, and the settlement/conciliation amounts, if any, awarded for each case. Region IX of the FHEO receives and investigates complaints by households regarding alleged violations of the FHA for cities and counties throughout California (as well as Arizona, Hawaii, Nevada, American Samoa, and Guam) and responded to a request for data regarding complaints received which concern alleged discriminatory housing practices having occurred in San Bernardino County for the previous five-year period from October 1, 2019, to October 1, 2024. (The

complete data table provided by HUD is included as an appendix to this report with the violation city, filing date, closure date, basis of complaint, issues cited, closure reason, and monetary relief provided.)

HUD reported the filing of 165 formal complaints alleging housing discrimination within the jurisdictions of San Bernardino County: 31 originating from the City of San Bernardino; 17 from Ontario; 17 from Rancho Cucamonga; 12 from Upland; and the remaining jurisdictions and communities in the County responsible for fewer than ten complaints each over the five-year period. (The Program Analyst reported that most, if not all, of these 165 cases were dual filed and processed by the FHAP/CRD.)

HUD's records showed that 17 cases were still pending/under investigation (as of 11/12/24); 85 cases (~52%) were closed by the FHEO/FHAP agency for "no cause"—i.e. after a full investigation was conducted, the investigating agency did not find sufficient evidence to support the complainant's allegations of unlawful discrimination; 34 cases (~21%) had been successfully resolved through conciliation and a settlement agreement negotiated between the parties; 7 cases were administratively closed after the complainant stopped cooperating or the complainant could not be located; 5 cases were withdrawn by the respective complainant after resolution; 16 cases were withdrawn by complainant without resolution but because the complainant no longer wanted to pursue; and one case was dismissed for lack of jurisdiction. In none of the cases so far did HUD/CRD find reasonable cause to believe discrimination occurred and issue a Charge of Discrimination.

In 28 cases resolved through conciliation/settlement, respondents paid damages to the aggrieved party and/or into a victims' fund in amounts ranging from $105 to $12,000 and totaling $109,880. Details regarding whether and what form of equitable or injunctive remedies were also negotiated and approved as part of case settlements were not disclosed in HUD's data. In cases resolved by settlement/conciliation, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

Although more than half of the cases were terminated after a no cause determination, these complaints still speak to public perceptions of housing discrimination occurring in the county.

The following table shows the basis of discrimination, also understood as the protected class status, alleged in the 165 cases. More than one basis of discrimination (protected class status) may be cited in a single complaint, thus why there were 230 identified bases of discrimination alleged in the 165 complaints filed. For the 165 cases opened by HUD during the reporting period, disability was the most often cited basis of discrimination, alleged by complainants to have occurred in approximately 56% of reported cases, followed by race in approximately 21% of cases, retaliation in approximately 19% of cases, national origin in approximately 13% of cases, sex in approximately 12% of cases, color in approximately 9% of cases, and familial status in approximately 7% of cases. The breakdown of basis of discrimination per year is shown in the following table:

Table 21. Basis/Protected Class Status of Discrimination Complaints

Basis of Discrimination Reported	Oct. 1, 2019—	2020	2021	2022	2023	—Oct 1, 2024	Total
Disability	1	15	16	18	25	17	**92**
Race		3	10	6	7	8	**34**
Retaliation		4	6	5	8	8	**31**
National Origin		6	3	6	5	2	**22**
Sex		6	4	2	3	4	**19**
Color		1	5	4	2	3	**15**
Familial Status		2		2	2	5	**11**
Religion			1	3	2		**6**
Total	1	37	45	46	54	47	**230**
Total number of cases filed per year (which may include more than one basis of discrimination per complaint)	1	28	30	32	40	34	**165**

Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory "issue." HUD reported that complainants identified the following discriminatory issues: Discriminatory terms, conditions, privileges, or services and facilities was the most often cited issue in 79 cases (~48% of cases), followed by failure to make reasonable accommodation in 78 cases (~47% of cases); discriminatory refusal to rent in 64 cases; discriminatory acts under Section 818 (coercion, etc.) was cited in 41 cases; discriminatory advertising, statements and notices was cited in 26 cases; discrimination in terms/conditions/privileges relating to rental in 12 cases; discriminatory refusal to negotiate for rental in 4 cases; among others.

Complaints filed with the California Civil Rights Department

HUD's program analyst noted that most, if not all, of the complaints reported by the FHEO were dual filed with and processed by the California Civil Rights Department. A request for housing discrimination complaint data also was made to the CRD. The CRD's custodian of records designee responded that any disclosable records under the CA Public Records Act will be made available on 1/31/2025.

State-wide housing discrimination complaint data can be gleaned from the CRD's Annual Reports,[44] including total number of cases accepted for investigation, basis/bases of complaints reported for the expanded classes of protected persons under the FEHA, demographic information of complainants, and the number and amounts of settlements. The reports identify the number of complaints by county but not more nuanced information by county related to basis of complaints, issues cited, disposition of cases, demographics of complainants, or settlement numbers.

Table 22. CRD Housing Discrimination Complaints Reported from San Bernardino County and State-wide

California Civil Rights Commission Annual Reports Housing Complaints Accepted for Investigation per Year		
Year	State-wide Total	San Bernardino County
2019	934	21
2020	880	25
2021	898	27
2022	1,004	36
2023	1,254	53
Total	**4,970**	**162**

The housing discrimination complaints originating from San Bernardino County between 2019 and 2023 made up only 2%-4% of all California cases.

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[44] CRD Annual Reports are prepared pursuant to Government Code section 12930(k), which requires the Civil Rights Department to "render annually to the Governor and the Legislature a written report of its activities and its recommendations." Annual Reports from 2008 through 2023 are available at https://calcivilrights.ca.gov/legalrecords/#reportsBody.

Fair Housing Enforcement through Civil Litigation

Under the FHA and the California Fair Employment and Housing Act, in addition to or as an alternative to filing an administrative complaint, an aggrieved person retains the right to file a civil action in an appropriate U.S. district court or state court (with proper jurisdiction and venue) not later than two years after the occurrence or the termination of an alleged discriminatory housing practice, thus maintaining control of the case and the potential to collect punitive damages. Victims do not have to first exhaust their administrative remedies before filing a lawsuit nor be issued a "right to sue" letter from the administrative enforcement agency (unlike employment discrimination cases). The respondent in an administrative action also may elect to have the administrative proceeding terminated and the case instead adjudicated in federal court. If an administrative action already has commenced, the parties still may elect to move the case to court for adjudication as long as the parties have not already entered into a conciliation agreement to resolve the alleged discriminatory housing practices or, following a charge of discrimination, an administrative hearing has not already commenced. Where an administrative action has been filed, the two-year statute of limitations is tolled during the period when the FHAP/HUD is evaluating the complaint.

Additionally, the DOJ may bring suit on behalf of aggrieved individuals based on referrals from HUD, or on its own initiative, in the case of a "pattern or practice" of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. An aggrieved party may intervene in any action filed by the DOJ.

Where the court finds liability, it may award preventative relief (permanent or temporary injunction, restraining order, or other order), actual/compensatory damages, a civil penalty up to $50,000 for a first violation and up to $100,000 for a second or subsequent violation, and punitive damages. An aggrieved party may intervene in any action filed by the DOJ. Settlement amounts or jury awards often are much larger for cases prosecuted in court than victim compensation awards or settlement amounts through the administrative process.

Fair housing lawsuits may be filed against local governments and zoning authorities and against private housing providers, mortgage lenders, developers, or real estate brokers. Because the FEHA has been determined to be substantially similar to the FHA, court opinions interpreting the FHA are instructive in interpreting the state law. "FEHA in the housing area is thus intended to conform to the general requirements of federal law in the area and may provide greater protection against discrimination." *Brown v. Smith*, 55 Cal. App. 4th 767, 780 (1997).

For the recent five-year period studied—October 1, 2019, through October 31, 2024— three noteworthy lawsuits were found regarding allegations of unlawful housing discrimination occurring in San Bernardino County that resulted in a significant settlement in federal court or state court litigation. The cases chosen for discussion illustrate how discrimination in housing can show up in a variety of ways and negatively impact fair housing choice in the jurisdiction for persons identified with a protected class.

- ***United States v. City of Hesperia, Civil Action No. 5:19-cv-02298 (C.D. Cal.) (case filed 12/2/2019; Consent Order entered 12/27/22)***

The United States DOJ brought this action against the City of Hesperia, San Bernardino County, and the San Bernardino County Sheriff's Department based on an investigation and charge of discrimination by HUD, which found that due to the City's "crime free ordinance" African American renters were four times more likely and Latino renters were 29% more likely than non-Hispanic white renters to be evicted and that evictions disproportionately occurred in majority-minority parts of the city. The complaint alleged the defendants engaged in a pattern or practice of discrimination based on race and national origin through the adoption and enforcement of a so-called "crime-free" rental housing program with the intent, effect, and impact of forcing African-American and Hispanic or Latino residents out of the city. One City Councilmember stated the intent of enacting the ordinance was to address a "demographic problem"— i.e. the city's increasing Black and Hispanic/Latino population—and the lawsuit alleged the Sheriff's Department targeted Black and Hispanic/Latino renters for enforcement of the ordinance. The DOJ alleged that the Sheriff's Department notified landlords to evict entire families including children for conduct involving one tenant or even non-tenants, evict victims of domestic violence, and evict based on mere allegations without evidence of criminal liability or conviction.

Defendants denied liability but under a settlement and Consent Order the DOJ called a "landmark agreement," Hesperia repealed its "crime-free" ordinance, modified the related rental housing business license ordinance, and reduced fees associated with rental housing business licenses. The Sheriff's Department agreed to stop enforcement of the "crime-free" program. The Defendants also agreed to a settlement fund of $670,000 to compensate individuals harmed by the program; the payment of $100,000 in civil penalties; $95,000 for affirmative marketing to promote fair housing in Hesperia; $65,000 to partnerships with community-based organizations; notifications to city and county employees, property managers, landlords, and rental property owners of the changes to the ordinances and fee schedule; submission of certain policies, procedures, and ordinances for the DOJ's review and approval; adoption of non-discrimination policies and complaint procedures; designation of civil rights coordinators; anti-discrimination training; a fair housing needs assessment; and reporting to the court and the DOJ during the Consent Order's five-year term.

- ***California Civil Rights Department v. Pierce Projects, Inc., Civil Case No. CIVRS2400908 (San Bernardino Cnty Sup. Ct.) (complaint filed Sept. 13, 2024).***

In 2023, the California Civil Rights Department (CRD) received a complaint from a tenant alleging that her landlord in San Bernardino County rejected her request to start using a housing choice voucher to help pay the rent. Complainant was an existing tenant of the landlord's property and had recently been accepted into the Section 8 HCV program after her economic circumstances changed. The landlord, who owns hundreds of rental units in California, allegedly refused her request, and consequently the tenant was forced to move out in order to keep her voucher.

The CRD completed its investigation and found reasonable cause to believe the landlord had discriminated on the basis of the tenant's source of income, a newly protected category under the FEHA beginning January 1, 2020. When mediation efforts failed, the CRD filed this lawsuit on behalf of the complainant to enforce source of income protections and seek financial compensation for the tenant who lost her housing. As of November 7, 2024, the landlord defendant had not filed an answer to the complaint, but through counsel, requested a 30-day extension of time to respond. This case is still pending as of the date of this report.

- ***People's Collective for Environmental Justice v. County of San Bernardino, Civil Action No. CIVSB2228456 (San Bernardino Cnty Sup. Ct.) (complaint filed Dec. 16, 2022; next hearing date June 16, 2025).***

In 2022, the San Bernardino County Board of Supervisors (Board) approved the Bloomington Business Park Specific Plan (Specific Plan) to establish an industrial zone for 213 acres in Bloomington. The Specific Plan Area is separated into two planning areas: Planning Area A and Planning Area B. Planning Area A is 141.4 acres and has a proposed opening year of 2026. Planning Area B includes the remaining 71.6 acres and a proposed buildout year of 2040. The maximum industrial development potential within the Specific Plan would be 3,235,836 square feet. In conjunction with the Specific Plan, the Board also rezoned 24 acres (Upzone Site) from Low Density Residential to Medium Density Residential to offset the loss of housing capacity from rezoning the Specific Plan Area. The Upzone Site is currently developed with a mix of single-family residential uses and vacant parcels. Rezoning would allow for the development of housing from 52 to 480 residential units on the Upzone Site. The Board also approved various entitlements within Planning Area A, which included three high cube warehouses and a truck/trailer parking lot within 115 acres of the Specific Plan Area.

. Under the proposal, 78 residential structures would be demolished to make space to build the three warehouses and truck/trail parking lot in Planning Area A. Future development of Planning Area B would require the demolition of 39 residences. A coalition of environmental groups filed suit asking the court to overturn the County's approval and stop the proposed project. Petitioner's operative third amended petition (TAP) for writ of mandate and complaint for declaratory and injunctive relief alleges the following causes of action: (l) violation of the California Environmental Quality Act (CEQA) (inadequate final Environmental Impact Review ; failure to provide meaningful opportunity for Spanish-speaking residents to participate); (2) failure to affirmatively further fair housing; (3) violations under the California Fair Employment Housing Act because of the effect on Hispanic/Latino communities in terms of displacement and environmental hazards; (4) claim under Government Code section 12989.1(a); (5) and a claim under Code of Civil Procedure section 526a. The TAP alleges the affected area of mostly Hispanic and Latino neighborhoods of approximately 23,000 people has already experienced environmental impacts as developers convert areas around the 10 Freeway into a logistics corridor.

The lawsuit claims the project violates fair housing laws as it was targeted towards "a Hispanic or Latino community and a community already experiencing negative health impacts due to air quality causing displacement of residents and compounding environmental harm to those who remain."

By stipulation and order the case was split into two phases, with Phase 1 addressing the CEQA claims only. In a 100-page order entered September 17, 2024, the Court found numerous defects in the project's environmental impact report (EIR) and ordered the County to set aside certification and related approvals. The County must prepare an update EIR in compliance with CEQA before any construction can begin. Plaintiff Western Center on Law & Poverty stated it will continue to pursue the housing discrimination claims as part of the lawsuit, but it is not clear from the court's Phase 1 ruling when or if the merits of the fair housing claims will be litigated and adjudged. No trial date has been set for Phase 2.

During the previous five-year period, seven private lawsuits were filed in the Central District of California-Eastern Division concerning housing units in San Bernardino County. Disability was cited as a basis of discrimination in 4 of the 7 cases; followed by race in 2 cases; and source of income, familial status, religion, and sex in one case each. Two cases were still pending at the time of this report, two cases had been dismissed for lack of prosecution by the plaintiff or voluntarily by the plaintiff before resolution, two cases were closed through settlement agreements, and one case ended in a judgment for the plaintiff after a trial on the merits.

	Fair Housing Litigation filed in the Central District of California Federal Court					
Subject Property Jurisdiction	**Case Name**	**Civil Action No.**	**Filing Date**	**Closure Date**	**Basis of Discrimination**	**Case Status or Disposition**
Upland	Love v. Coyle	5:23-cv-02555	12/14/23		Race, source of income	Referred to private mediation to be completed by 2/24/25
Chino Hills	Albert Ceary tiLee Jr v. Alex Shing Yu Leung	5:22-cv-01784	10/11/2022		Disability (accom. for service animal)	On April 30, 2024, the Court held a one-day bench trial and directed the parties to submit written closing arguments with the case then deemed under submission awaiting final judgment and order
Ontario	Harris v. Landsea Homes Corporation	5:22-cv-01489	8/24/22	11/10/22	Race	Voluntary dismissal
Twentynine Palms	Guererro v. Camp Pendleton & Quantico Housing, LLC	5:22-cv-00931	6/3/2022		Disability (reasonable accom.)	Judgment for Plaintiffs in amount of $90,800.00 plus attorney's fees and costs
Yucca Valley	Woodruff v. Nordine Family Trust	5:21-cv-01728	10/13/2021	1/28/22	Sex, Religion	Dismissed for lack of prosecution
Rancho Cucamonga	E.G. v. Brighton at Terra Vista Homeowners Association	5:20-cv-00820	4/16/2020	10/27/20	Disability, familial status	Court approved settlement payment of $12,500 for the minor Plaintiff

Twentynine Palms	Warner v. 29 Palms RealCorp.	5:19-cv-00588	4/2/2019	6/8/2020	Disability (reasonable accom.)	Stipulation of dismissal pursuant to confidential settlement agreement
Source: Pacer.gov						

Past Fair Housing Goals and Related Activities

San Bernardino County last completed an Analysis of Impediments to Fair Housing Choice in 2020. That report listed the following fair housing goals:

1. Decrease disparate access to opportunity for People of Color
2. Increase affordable housing supply in existing areas of opportunity
3. Address increasing levels of residential segregation
4. Continue community fair housing education
5. Increase housing options for people with disabilities

The following table details actions taken to meet these goals and their implementation status.

Fair Housing Goal	Implementation Status
Decrease disparate access to opportunity for People of Color	Funded youth programs across the County, three of which focused solely on youth education, with CDBG funding (2020-2024) Funded programs with CDBG funding offering adult literacy services, including reading, spelling, and basic computer skills, to low-income individuals, providing opportunities to address academic proficiency barriers (2020-2024) Funded programs with CDBG funding focused on providing job skills training and employment readiness to low-income individuals (2020-2024) Investigated strategies to provide assistance to persons in high poverty areas, including Broadband access to eliminate a digital divide in rural parts of the County where many persons live in poverty (2020-2023) Hosted two IFHMB Fair Housing workshops at Adult Education classes for persons that are learning English as their second language (2022-2023)

Increase affordable housing supply in existing areas of opportunity	Established a Housing Development Fund to accelerate the production of new housing units (2023-2024)

Used HOME funds to support several affordable housing developments, including Bloomington Grove III, Arrowhead Grove II, Las Terrazas Apartments, Rialto Metrolink South, and the Liberty Lane Project (2020-2024)

Funded public service programs that offer food assistance and supportive services in areas with low access to opportunity (2020-2023)

Expanded and improved access to parks, public facilities, and sidewalks (2020-2023)

Updated County Citizen Participation Plan to provide more inclusiveness (2022-2023)

Implemented Program 4 of the Housing Element (2022) and conducted a Short-Term Rental Study to analyze the effects of short-term rentals on housing in the unincorporated communities of the County (2022-2024). Based on extensive public engagement and data analysis, County staff finalized the study and presented findings to the Board of Supervisors on June 11th, 2024. The Board Item recommended several strategies to increase the availability of affordable housing in Joshua Tree. Proposed initiatives include augmentation of existing affordable housing programs and consider development of new affordable housing programs. |
| Address increasing levels of residential segregation | Used HOME funds in combination with other funding sources such as LIHTC to support several affordable housing developments, including |

	Bloomington Grove III, Arrowhead Grove II, Las Terrazas Apartments, Rialto Metrolink South, and the Liberty Lane Project (2020-2024)
Continue community fair housing education	Partnered with the Inland Fair Housing and Mediation Board (IFHMB) to offer fair housing counseling to people and families who have encountered housing discrimination and to provide education and mediation services for landlord/tenant issues such as evictions, repairs, security deposits, and foreclosure rights (2023-2024) Maintains public information for, potential tenants, property owners, and the general public about federal fair housing laws and the affirmative marketing policy using methods such as using the Equal Housing Opportunity logo, targeted advertising, fair housing signage, staff training, and ensures that Community Housing Development Organizations (CHDO) have plans for tenant participation in property operations (2023-2024) Provides fair housing materials in multiple languages, such as English, Spanish, and Chinese, through the IFHMB and the National Fair Housing Alliance's "Fair Housing Resource Center." (2020-2024)
Increase housing options for people with disabilities	Development of the Housing Development Fund to provide gap funding to support the acceleration of new housing units (2023-2024) Closely collaborated with developers to integrate and cater to all requirements for upcoming subsidized housing for individuals with disabilities (2023-2024)

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 23, along with proposed responsible parties and partners who may take a role in implementing the recommendations.

Impediment #1: Housing affordability and quality issues reduce housing choice

A lack of housing options affordable to low- and moderate-income households was one of the issues most frequently cited by residents and stakeholders in San Bernardino County. Respondents to the housing and community development survey identified 'not enough affordable housing for individuals,' 'not enough affordable housing for families,' 'displacement of residents due to rising housing costs,' and 'not enough affordable housing for seniors' as the top barriers to fair housing in the county. This shortage has become increasingly dire over the past five years, as home values in the county have increased by more than 50% while wages have remained comparatively stagnant. Declining vacancy rates and rising rents are also indicative of an increasingly tight housing market. An estimated 11.0% of owner households and 28.0% or renter of households in San Bernardino County are severely cost-burdened, spending more than 50% of income on housing.

Data on age of housing in San Bernardino County and the MSA points to a decline in construction of new units since 2010, indicating a need for strategies to increase development of new affordable housing. Lack of interest from LIHTC developers and NIMBYism toward proposed new housing developments contribute to the lack of new housing development,. The refusal of some landlords to accept Housing Choice Vouchers further complicate housing access by limiting the housing supply accessible to voucher holders.

As single-family detached structures make up the vast majority (about 69% to 70%) of housing units in San Bernardino County and the MSA, there is a particular need for development of affordable multifamily and 'missing middle' housing units. Lack of diversity in housing types decreases the availability of housing affordable for low- to moderate-income households who are unable to afford single-family homes. Apartments and smaller, more affordable units are also essential for many seniors and residents with disabilities.

In addition to the need to increase the supply of affordable housing, the county's large share of older housing stock indicates a high level of need for rehabilitation and repair programs.

A similar impediment was identified in San Bernardino County's 2020-2024 Analysis of Impediments to Fair Housing Choice, and the County has made efforts to address this issue through strategies such as establishing a Housing Development Fund to accelerate the production of new housing units, and using HOME funds to support several affordable housing developments. However, this challenge remains and

is directly tied to impediments related to homelessness and a lack of access to housing for protected classes. Continuing to implement and fund strategies to increase housing affordability will be vital to supporting residents in accessing housing in the county.

Impediment #2: Limited Access to Housing Disproportionately Impacts Protected Classes

The housing market analysis conducted in this study identifies several disparities in access to housing among several characteristics, including race/ethnicity, household income, and disability status. Here, access to housing refers to factors such as access to homeownership, access to affordable housing (spending 30% or less of household income on housing costs), and access to a variety of housing types across the county.

Data shows that the homeownership rate among San Bernardino County residents is lowest among Black/African American households (~38% compared to 50%-70% for other groups) who also experience limited access to mortgage loans, with denial rates that are approximately 2X all other racial/ethnic groups. Additionally, analysis of housing needs (including cost burden, overcrowding, and lacking complete kitchen/plumbing facilities) indicates that Black and Hispanic households, along with low-income renters and persons with disabilities, experience housing needs at disproportionately high rates compared to other groups.

Demographic data on households living in publicly supported housing finds that Black residents are overrepresented in these programs, comprising 44% of all publicly supported residents compared to 8% of the county's total population and 15% of low-income renters. Comparatively, the same dataset shows that Hispanic residents are underrepresented in publicly supported housing, making up nearly half of the county's total population (54%) and its low-income renters (51%) yet only a third (33%) of publicly supported housing residents. This finding indicates that there may be barriers to accessing existing housing programs/services for Hispanic households in particular. As the county's share of Hispanic, Limited English Proficiency (LEP), and foreign-born households continue to increase— along with segregation levels between white and non-white populations— it will be vital for these programs and services to continuously evaluate their accessibility to these populations and take necessary actions to eliminate these barriers.

Geographic distribution of the county's housing stock and publicly supported housing reflects a stark urban/rural divide with most of the county's affordable housing concentrated in areas of high population density, such as the southeastern area of the county containing the City of San Bernardino. This area contains the vast majority of the county's housing choice voucher (HCV) activity, which plays a vital role in the supply of affordable housing in the region (~1.6% of the county's total housing stock, similar to its share of LIHTC developments). Other publicly supported housing options, such as Project-Based Section 8 developments and Section 202/811 units, also follow these distribution patterns. Given other

demographic information including the distribution of households with disabilities, the share of publicly supported housing residents with disabilities, and the limited affordable housing stock available to persons with disabilities— especially those living in more rural areas of the county— represents an impediment to housing based on a protected class characteristic.

Impediment #3: Disparate access to neighborhood opportunity.

In many cities and counties, a person's place of residence impacts the resources they are able to access. Neighborhoods without equal access to resources may present a barrier or impediment to fair housing choice when residents are limited to such neighborhoods by financial or other circumstances.

The analysis of access to opportunity indicated that, for several opportunity types, levels of access vary throughout San Bernardino County. Overlaying these variations with demographic patterns showed that some population groups are generally less likely to live in neighborhoods with access to certain resources than are other groups. Specifically, data indicates that, on average, Black/African American and Latino/Hispanic residents in San Bernardino County live in areas with higher poverty and lower levels of school proficiency, labor market engagement, and environmental health than white residents countywide. Looking specifically at the population below the federal poverty line shows that these disparities persist even when controlling for income. Statistically, poor Black/African American and Latino/Hispanic residents live in neighborhoods with higher poverty, lower school proficiency, and worse environmental health than do poor white residents. Since 1990, the county's segregation levels increased even further, bringing it from a low to a moderate range level of segregation which accelerates the level of disparities among various racial and ethnic groups. However, geographic disparities also exist among the most urban and rural areas of the county which have resulted in varying socioeconomic patterns.

Several contributing factors to disparities in access to opportunities were identified, including the following:

Low Educational Attainment and Median Incomes

San Bernardino County overall has low educational attainment, with only 22.4% of residents aged 25 and older holding a bachelor's degree or higher. Geographic disparities exist, with a percentage of over 60% of residents having a bachelor's degree in parts of south San Bernardino County, and only 5-20% in east and central San Bernardino County. Disparities in educational attainment also exist by race and ethnicity in the county. White residents tend to have higher levels of educational attainment (an estimated 52.8% have a bachelor's degree or higher), while residents of two or more races and Hispanic or Latino residents are least likely to have higher levels of education (11.0% and 10.5% have a bachelor's degree or higher, respectively. While labor force participation rates are similar across all racial and ethnic groups, median household incomes tend to vary. Median household incomes are highest for white residents, ($96,709) and lowest for Hispanic or Latino residents, ($59,470). In comparison, the median household income in San Bernardino County was $77,423 as of the 2018-2022 ACS data. Median incomes are lowest in

southeast and northeast tracts and highest in certain cities in the southwest tracts, where median incomes exceed $150,000.

Lack of transit access and pedestrian-friendly infrastructure

Through the community survey, participants noted that, being a part of the unincorporated portion of the County, access to resources such as public services, etc. is limited. Many residents desire to stay within their communities where they have access to housing, transit, job centers, and social networks. However, 39.4% of survey respondents said bus services are not equally provided; and 21.3% indicated that they do not know if there were or were not equally provided. Public transit ridership among moderate-income residents is overall low throughout the county, with most tracts having shares between 1.1% to 3% of residents who use public transit. The combination of lower proximity to jobs and transit and higher shares of household income spent on transportation presents barriers to obtaining and maintaining employment and housing. Walkability also influences residents' access to employment, resources, and services. Moderate walkability is found in the dense urban areas in the southwest portion of the county, while the rural areas of the northeast part of the county had lower levels of transit ridership and lower walkability overall. Additionally, more than three-quarters of respondents (77.9%) noted there is a high need for street, road, and sidewalk improvements throughout the county, amplifying the need for infrastructure investment across many communities.

In combination, these factors have the potential to severely limit a person's housing choice and therefore their access to resources. Many of these resource access issues affect the same census tracts, therefore compounding each other. A person living in a tract with lower rates of health insurance is less likely to have a vehicle, meaning that they may be forced to remain in the same neighborhood in order to be within walking distance of a low-wage job, and may be unable to access higher-wage jobs with better benefits, such as health insurance, due to lack of transportation. As many of these access issues overlap in San Bernardino County's R/ECAP tracts, which is primarily occupied by Black and Hispanic residents, it is an indication that resource access issues within the County continue to disproportionately impact protected class groups and therefore constitute and impediment to fair housing choice.

San Bernardino County along with its participating jurisdictions can align its work and investments with other local businesses and nonprofits to identify place-based strategies that would improve the physical resources and building human capital in low opportunity and/or high poverty areas. Strategies should address things such as the need for supplemental youth education programs; adult education and employment opportunities; remove barriers to employment; and ensure development of adequate public infrastructure and facilities.

Impediment #4: Heightened need for homelessness resources disproportionately impacts protected classes

While San Bernardino County has recently increased organized efforts surrounding homeless resources through the establishment of the Community Revitalization Office and the 2022 Homeless Strategic Action

Plan, data on homelessness and community feedback both indicate that homelessness is still a pressing issue within the County and that there is a need for increased effort in this area. Since the time of the County's last Analysis of Impediments, the homeless population within the County has nearly doubled (4,255 in 2024 vs 2,607 in 2019[45]).

The following factors contribute to this impediment to fair housing choice:

A homeless population disproportionately composed of protected class groups

Data collected from the Point-In-Time counts indicates that people experiencing homelessness within the County are disproportionately more likely to be members of protected class groups, meaning that a lack of effective implementation of homeless resources constitutes a barrier to fair housing. 21% each of the unsheltered homeless population reported having a physical disability or mental illness in 2024, while 29% reported having a substance use disorder. In comparison, only around 12% of the County's overall population has one or more disabilities.

In addition, Black residents in particular are significantly overrepresented in both the sheltered and unsheltered homeless population, comprising about 28% of the former and 18% of the latter despite making up only 7.5% of the total population. White residents were also overrepresented among the homeless population, although to a lesser degree, while Hispanic and Asian residents were underrepresented among the homeless population.

A need for increased support of the 2022 Homeless Strategic Action Plan's goals

San Bernardino County adopted a Homeless Strategic Action Plan in 2022 which outlines clear goals and priorities that have the potential to substantially alleviate homelessness and related needs within the County. While a significant increase in the number of sheltered homeless individuals in the past 5 years show that the Plan's goals of increasing shelter capacities is important and effective, the number of unsheltered homeless individuals in 2024 remains high, indicating that a great need still exists for further implementation of planned goals and resources. Additionally, review of the goal outcome indicators outlined within the HSAP in comparison with the expansion of the sheltered homeless population indicate that some goals may have already been reached, showing a potential need to amend goals in 2025. Continuing to fund and pursue the HSAP's goals and increasing support if possible will prove vital to overcoming this impediment to fair housing choice, and it may prove worthwhile to review the HSAP and amend some outcome indicators in order to more aggressively pursue results.

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[45] San Bernardino County Annual Point-In-Time Counts

Impediment #5: Current fair housing efforts are not producing sufficient results

San Bernardino County's previous Analysis of Impediments listed a goal of continuing community fair housing education and enforcement efforts, and past CAPERs detail continuation of efforts in this area. However, comparing community feedback from this AI with that of the previous AI indicates that these efforts are not producing meaningful results – in 2019, 53% of survey participants reported that they fully understood their fair housing rights, in comparison with only 46% in 2024; similarly, in 2019 around 25% of residents were confident that housing discrimination was not an issue in San Bernardino County, in comparison to just 16% in 2024.

The following factors contribute to this impediment to fair housing choice:

A need to implement new methods of community outreach and communication

A decrease in community knowledge of fair housing rights in the presence of continued effort from the County indicates a need to rethink the County's current approach to community fair housing education and to investigate new methods of outreach and communication with the public in order to reduce barriers to fair housing resulting from housing discrimination.

A need for targeted fair housing resources in non-English languages, primarily Spanish

Survey participants from households where one or more members primarily speak a non-English language were more likely to experience housing discrimination than survey respondents as a whole, but less likely to fully understand their fair housing rights or to know how to file a housing discrimination report. This indicates a need for targeted fair housing education efforts in non-English languages, especially in Spanish, which is the primary language of about 12% of San Bernardino's population

Contributing Factors	Recommended Activities	Responsible Parties and Partners
IMPEDIMENT #1: Housing Quality and Affordability Issues Reduce Housing Choice		
Limited new construction of affordable housing	• Continue using the Housing Development Fund and CDBG and HOME funds to increase and maintain the availability of high-quality, affordable rental housing through new construction and rehabilitation • Continue to consider affordable housing bonds, development fees, or other options to provide funding for the Housing Development Fund • Consider and adopt zoning code amendments that could increase possibilities for development of affordable housing • For developers proposing LIHTC projects in areas with access to key community resources/opportunity factors, such as accessibility to employment centers or areas experiencing a loss of affordable rental units, work closely with the developers to increase the competitiveness of their applications through letters of support, provision of data and information, gap financing, and other assistance • Continue to review the Annual Qualified Allocation Plans issued by the California Tax Credit Allocation Committee under the Low Income Housing Tax Credit (LIHTC) program to identify local government policies or actions that may positively impact the competitiveness of developers' applications • Consider partnering with Community Land Trusts to support the development of permanently affordable housing options	San Bernardino County Affordable housing developers Residents and stakeholders
Lack of variety in housing types	• Consider and adopt zoning code amendments that could support development of 'missing middle' and multifamily housing types	San Bernardino County Residents and stakeholders
Older housing units are in need of rehabilitation and repair	• Continue to use CDBG, HOME or other funding to support housing rehabilitation and repair for low-income homeowners	San Bernardino County Residents and stakeholders

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The Housing Authority has difficulty placing housing vouchers. There are long wait lists and long placement timeframes. Landlords often refuse to rent to voucher holders	• Adopt a local source of income protection ordinance	San Bernardino County Residents and stakeholders
Short-term rental impacts within select regions of the County	• Completed Program 4 of the Housing Element to conduct a study on the impacts of short-term rental housing on the local community. • The Study was accepted by the Board on June 11, 2024, with the Board recommending several strategies to reduce the impacts of short-term rental housing in Joshua Tree.	San Bernardino County Residents and stakeholders
NIMBYism prevents proposed new developments	• Develop educational programming with the goal of developing an understanding of affordable and workforce housing among county residents	San Bernardino County Residents and stakeholders

Contributing Factors	Recommended Activities	Responsible Parties and Partners
IMPEDIMENT #2: Limited Access to Housing Disproportionately Impacts Protected Classes		
Limited access to homeownership and mortgage loans among Black households	• Expand first-time homebuyer assistance and education programs o Provide pre-application assistance to increase chances of securing a loan • Conduct outreach to local lenders to discuss disparities in homeownership rates and lending access	• San Bernardino County • Area mortgage lending/financial institutions
Disproportionately high rates of housing needs among Black and Hispanic households, low-income renters, and people with disabilities	• Expand housing rehabilitation and repair programs for low-income homeowners and renters • Increase the number of affordable accessible units through the expansion of Section 202, Section 811, or other funding source developments • Support programs that assist people with disabilities in making accessibility modifications to their homes • Support housing stability/fair housing services such as eviction prevention, rental assistance, and legal aid	• San Bernardino County • Housing Authority of the County of San Bernardino
Publicly supported housing population exhibit disproportionately high shares of Black households and disproportionately low shares of Hispanic households	• Periodically review and update publicly supported housing program procedures and requirements to ensure that they are free from language access barriers or other cultural barriers • Partner with community organizations to conduct targeted outreach about these programs to underrepresented populations	• San Bernardino County • Housing Authority of the County of San Bernardino

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Contributing Factors	Recommended Activities	Responsible Parties and Partners
IMPEDIMENT #3: Disparate access to neighborhood opportunity.		
Educational and employment barriers limit economic opportunities	• Work with local adult / continuing education providers and job search assistance agencies to better identify barriers their students / clients face. Consider opportunities to use CDBG funding to address potential barriers, possibly to include employment readiness, GED classes, or job training programs designed to serve residents living in high-poverty areas. • Consider providing business and entrepreneurial support to new or expanding businesses that fill a market niche and create jobs for low-income residents. • Consider providing CDBG or other funding for youth education enrichment activities to encourage reading proficiency, high school completion, career and/or college preparation, and other education components.	• San Bernardino County • CDBG Participating Jurisdictions
Need for neighborhood revitalization in areas of low opportunity	• During the Consolidated Planning process, identify place-based strategies focused on improving physical resources in specific, defined high-poverty areas.	• San Bernardino County • CDBG Participating Jurisdictions

| Lack of vehicle access and public transit options concentrated in certain areas of the County | • Expand bus routes and operational hours in areas of the County with low vehicle access rates

• Investigate the potential to expand subsidized rideshare programs for non-disabled residents in areas of the County with low vehicle access rates

• Ensure that bus routes throughout the County provide easy access to supermarkets and other essential services and needs.

• Improve sidewalks and streets to and expand walking/biking trails to encourage pedestrian safety and walkability in neighborhoods. | • CDBG Participating Jurisdictions

• San Bernardino County Transportation Authority |

Contributing Factors	Recommended Activities	Responsible Parties and Partners
IMPEDIMENT #4: Heightened need for homelessness resources disproportionately impacts protected classes		
A homeless population disproportionately composed of protected class groups	• Expand resources for residents with disabilities, particularly those focused on homelessness prevention for this group, and establish metrics for number of people diverted from homelessness in order to measure success (2025, ongoing) • Expand resources for residents with substance use disorders, particularly those focused on homelessness prevention for this group, and establish metrics for number of people diverted from homelessness in order to measure success (2025, ongoing)	San Bernardino County Community Partners San Bernardino County Community Partners
A need for increased support of the 2022 Homeless Strategic Action Plan's goals	• Review funding currently dedicated to implementing the 2022 Homeless Strategic Action Plan and determine whether there is potential to increase funding (2025, ongoing) • Review outcome indicator metrics presented within the 2022 Homeless Strategic Action Plan and adjust metrics as necessary in order to more aggressively expand homeless resources and account for goals already achieved (2025, ongoing)	San Bernardino County Community Partners San Bernardino County Community Partners

Contributing Factors	Recommended Activities	Responsible Parties and Partners
IMPEDIMENT #5: Current fair housing efforts are not producing sufficient results		
A need to implement new methods of community outreach and communication	• Draft new a community fair housing education plan and include in the development community organizers and non-profits who may have insight into new outreach methods and access to new channels of communication (2025, ongoing) • Develop outcome indicator goals for the fair housing education plan detailing measurable goals for increasing access to fair housing resources over the next 5 years (2025, ongoing)	San Bernardino County IFHMB Community Partners San Bernardino County IFHMB Community Partners
A need for targeted fair housing resources in non-English languages, primarily Spanish	• Ensure that all fair housing education materials and resources are available in Spanish as well as English, including ensuring easy and clear access to interpreters (2025, ongoing) • Ensure that any future fair housing education resources and efforts are developed and available in Spanish as well as in English (2025, ongoing)	San Bernardino County IFHMB Community Partners San Bernardino County IFHMB Community Partners