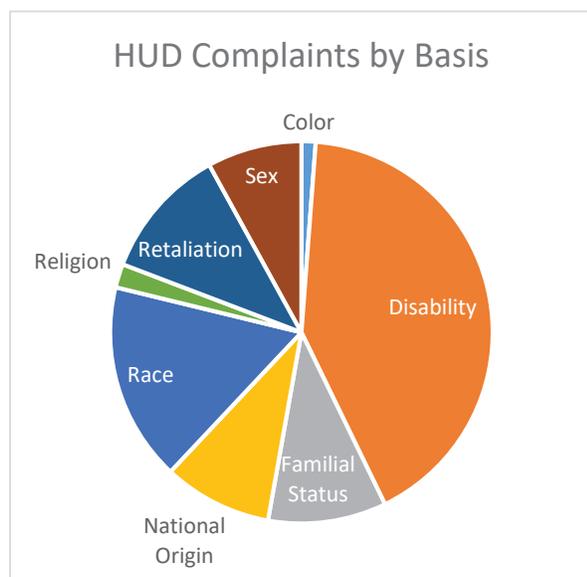


The number of complaints per year for each basis of discrimination from August 2014 to August 2019 are shown in the table below.

Table 21. HUD Fair Housing Complaints by Basis

Basis	2014	2015	2016	2017	2018	2019	Total
Color	0	1	0	1	1	0	3
Disability	8	27	27	13	16	13	104
Familial Status	2	10	4	2	2	5	25
National Origin	1	7	4	10	0	1	23
Race	2	13	10	8	4	5	42
Religion	0	3	0	0	2	0	5
Retaliation	1	6	5	1	8	7	28
Sex	0	5	6	4	1	4	20

Source: Data Request to HUD Region IX Office of Fair Housing and Equal Opportunity



More than one basis of discrimination may be cited in a single complaint. Disability was by far the most often cited basis of discrimination, alleged in 104 cases or nearly 53% of the 198 cases reported. Race was the second most alleged basis of discrimination in 42 cases; followed by retaliation in 28 cases; familial status in 25 cases; national origin in 23 cases; sex in 20 cases; religion in 5 cases, and color in 3 cases.

Complaints Filed with the California Department of Fair Employment and Housing

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

A request was submitted to the DFEH for data reflecting the number of housing discrimination related complaints received by the Department regarding housing units in San Bernardino County for the previous five-year period. From August 1, 2014 through the August 31, 2019, the DFEH received, processed, and closed 169 complaints of housing discrimination originating in San Bernardino County. Most of the alleged violators of the fair housing laws were individual landlords or housing providers as opposed to a development corporation, local government or agency, housing association, or realtor.

There were two complaints filed against the San Bernardino County Housing Authority—one case was dismissed after investigation and a no cause finding, and the other case settled by mediation. The complete data table provided by DFEH is included as an appendix to this report with the respondent, respondent address (not necessarily the violation city/ subject property address), filing date, closure date, basis of complaint, harms/issues cited, and closure reason. (As of the date of reporting, an additional 21 cases were still open or under investigation, but information regarding basis, issues, filing date, respondent, etc. was not included in the DFEH’s response and accordingly is not included in the table or explanatory narrative below.)

Of the closed cases, 79 were investigated and dismissed for insufficient evidence; 1 investigated and dismissed for no basis; 1 withdrawn with intent to file a lawsuit; 4 investigated and withdrawn for other reasons; 4 investigated and dismissed after resolved by the parties; 37 cases were closed after investigation and a no cause determination; 16 were settled by enforcement; 15 were successfully resolved by voluntary mediation; 2 settled by mandatory mediation; 2 were successfully conciliated; 4 were administratively dismissed; 1 complaint was withdrawn by complainant without resolution; and 2 were settled by DRD, voluntary mediation.

In the 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. No monetary damages were reported in any of the closed cases.

The number of complaints per year for each basis of discrimination from August 2014 to August 2019 are shown below.

Table 22. DFEH Complaints by Basis in San Bernardino County

San Bernardino County – DFEH Complaints by Basis							
Basis	2014	2015	2016	2017	2018	2019	Total
Age	0	1	0	0	1	0	2
Association with a member of a protected class	0	2	0	0	0	1	3
Color	1	2	0	1	4	1	9
Disability	11	27	25	15	10	3	91
Engagement in protected activity	0	4	5	0	1	0	10
Familial Status	2	10	5	1	2	0	20
Gender identity or expression	0	0	0	0	0	2	2
Genetic information	0	0	0	0	1	0	1
Marital status	0	2	3	0	1	1	7
National Origin	0	3	3	5	1	0	12
Race	2	13	8	8	5	2	38
Religion	0	5	1	0	2	0	8
Retaliation	0	0	0	0	0	0	0

Sex/Gender	1	6	2	2	5	2	18
Sexual harassment	0	0	0	0	4	2	6
Sexual orientation	0	3	1	0	1	1	6
Source of income	2	2	4	1	2	0	11

Source: Public Records Request Department of Fair Employment and Housing

As with HUD, more than one basis of discrimination may be cited in a single state agency complaint. Disability was again by far the most often cited basis of discrimination, alleged in 91 cases or nearly 53% of the 169 cases reported. Race was the second most alleged basis of discrimination in 38 cases; followed by familial status in 20 cases; sex/gender in 18 cases; national origin in 12 cases; source of income in 11 cases; and engagement in a protected activity in 10 cases. There are more categories of basis of discrimination reported by DFEH than HUD because the state's Fair Employment and Housing Act protects additional classes of persons than its federal counterpart.

Complaints Filed with Inland Fair Housing and Mediation Board

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

IFHMB provided the following data for complaints it received and processed originating in San Bernardino County for 2014-2019.

Table 23. IFHMB Fair Housing Complaint Data: FY 2014-2019

Protected Class	Total Cases	Percentage of Cases
Race	80	12%
Disability	479	70%
Familial Status	15	2%
National Origin	15	2%
Color	0	0%
Religion	5	1%
Sexual Orientation	6	1%
Ancestry	0	0%
Marital Status	5	1%
Source of income	11	2%
Arbitrary	9	1%
Sex	38	6%
Age	17	3%
Total	680	100%

Sexual orientation, marital status, source of income, age, and "arbitrary," which are protected classes under state fair housing laws, are additional categories not covered by the FHAA and HUD's data. IFHMB

reported receiving 680 housing discrimination complaints, with a significant majority (70%) alleging disability as the basis of discrimination, followed by race with 80 complaints or 12% of cases. No information was provided regarding specific issues alleged or the final outcome of complaints received, whether conciliated or referred to an enforcement agency.

FAIR HOUSING LAWSUITS AND LITIGATION

Significant Fair Housing Lawsuits

For the recent five-year period—January 1, 2014 through December 31, 2018—two noteworthy lawsuits were found regarding local ordinances that allegedly impacted the fair housing and other civil rights of tenants and housing providers in those jurisdictions. The third case described below, brought by the Department of Fair Employment and Housing, concerns a housing provider’s refusal to grant a reasonable accommodation to its “no pets policy” for a tenant with a disability who required a support animal.

- Victor Valley Family Resource Center v. City of Hesperia, Civil Action No. 5:16-cv-00903 (C.D. Cal.) (filed May 14, 2016; order dismissing case May 21, 2016)

This case arises from the City of Hesperia’s enactment of two ordinances—the “Group Home Ordinance” enacted in 2007 and codified in Hesperia Municipal Code Section 16.16.072 and the “Rental Housing Ordinance” enacted in 2015 and codified in Code Chapter 8.2. The Group Home Ordinance provided that in a district zoned R-1, unlicensed group homes were subject to approval of a conditional use permit. The ordinance explicitly prohibited group homes of 2 or more sex offenders or 2 or more individuals on probation. The Rental Housing Ordinance required all landlords renting or leasing a residential rental property in the City to register with the City and participate in the Ordinance’s “Crime Free Rental Housing Program.” Under the ordinance landlords were to run local and national criminal background checks on prospective tenants and new tenants were required to sign a Crime Free Lease Addendum agreeing that they will not violate any federal, state, or local law, including “public nuisance violations” on the premises of their rental unit or face eviction within days. The ordinances also directed that in the event of “criminal activity,” including an arrest, at a unit covered by a lease, the Chief of Police was to send a notice of criminal activity to the landlord, who must then start eviction proceedings against the tenant, regardless of whether the claims of criminal activity led to formal charges or a conviction.

At all relevant times, Plaintiff VVFC, a nonprofit organization that provides housing assistance to previously incarcerated persons experiencing or at risk of homelessness, rented and operated three residential homes in the City of Hesperia for its clients, who are individuals on probation facing transitional housing issues as a result of prior incarceration. Although VVFC had been operating homes in the City since 2011 with no issue, in 2015 the City began citing VVFC for violations of the Group Home Ordinance and Crime Free Rental Housing Program after complaints from neighbors of “public nuisance” violations at the homes.

The VVFC and individual plaintiffs, represented by the ACLU, sued the city and the San Bernardino County Sheriff (for enforcing the ordinances), alleging the ordinances were enacted with the intent of

excluding individuals in reentry from residential neighborhood and were unconstitutional and discriminatory.

In response to the lawsuit, the City repealed its group home ordinance and amended its rental housing ordinance so that the Crime Free Rental Housing Program was no longer compulsory but voluntary; removed the mandatory prospective tenant screenings; removed the mandatory use of a crime free lease addendum and mandatory evictions of tenants who are alleged to have violated criminal laws and the crime free lease addendum.

In its ruling on a plaintiffs' motion for a temporary injunction to enjoin enforcement of the ordinances, the Court expressed concern whether the City would be able to show a legitimate public purpose for enacting the Group Home Ordinance and whether the Rental Housing Ordinance could survive due process inquiry. The Court granted the temporary injunction against the City's enforcement of the ordinances. Without admitting liability or that the ordinances were unconstitutional or discriminatory, the City reached a settlement with the parties to avoid further litigation costs. The settlement included attorneys' fees to the ACLU of \$470,000, damages of \$14,462 to the VVFC, and \$369 to two individual plaintiffs as reimbursement of fines imposed by the city.

- Trautwein v. City of Highland, Civil Action No. 5:16-cv-01491 (C.D. Cal.) (filed July 8, 2016; dismissed May 31, 2017).

Plaintiffs, a landlord and tenants, brought this action to challenge as unconstitutional a City ordinance, the "Residential Rental Enhancement Program," that required all owners of residential rental properties to register and submit to a comprehensive inspection of the interior and exterior of the property before a residential rental business license will be granted, even though the property had not been the source of a complaint or code violation or other reasonable cause for an inspection. Without such registration, the property cannot be occupied or rented. Additionally, if a landlord or tenant refuses the search, the ordinance authorizes the inspector to seek an inspection warrant and compel a search of the property. Plaintiffs argued that the inspections amounted to a warrantless search and sought a court declaration that the City's actions constitute unconstitutional conditions and are invalid and unenforceable, an injunction preventing the City from imposing late fees and additional administrative charges or refusing to renew plaintiff's business license, reasonable attorneys' fees, and costs.

The City contended that its Residential Rental Enhancement Program, including the routine inspection requirement, was constitutional. However, the City voted to rescind the ordinance and the parties reached a settlement. The lawsuit was dismissed May 31, 2017.

- Dept. of Fair Employment & Housing v. Patlan, Civil Action No. EO69793 (Cal. App. 2019) (unpublished opinion issued Aug. 22, 2019) (Division 2 – San Bernardino County)

On two occasions, Defendant Patlan refused to rent an apartment to Plaintiff Sullivan because she has a dog, despite the fact that she informed Patlan that she needed the dog as a support animal to alleviate her disability. After being refused a reasonable accommodation to Defendant's "no pet policy", Plaintiff sought the help of Inland Fair Housing and Mediation Board and filed a complaint with the Department of Fair Employment and Housing (DFEH), alleging disability discrimination in violation of the Fair

Employment and Housing Act (FEHA) (Gov. Code, 2 § 12900 et seq.) and the Unruh Civil Rights Act (Civ. Code, § 51). The Department represented Sullivan in a civil action against Defendants.

The trial court found that because plaintiff was formally diagnosed with PTSD and her dog designated as a support animal by a psychologist sometime after her two encounters with Patlan, judgment should be in favor of the Defendants. However, the appeals court found that the trial court's reasoning—that Sullivan must have been "armed" with a formal diagnosis of her mental illness and designation of her dog as a support animal at the time of her attempts to rent—is erroneous. There was uncontroverted evidence that she had suffered from her disorders for years including during the times she met with Patlan. The FEHA requires that when presented with a claim that an accommodation is necessary for a renter's disability, a landlord must, at a minimum, open a dialogue and/or request documentation rather than reject the request out-of-hand as Patlan did.

The Court of Appeals reversed the judgment and remanded the case with instructions to enter a new judgment in favor of DFEH, Sullivan, and Inland Fair Housing and to determine an appropriate award of damages and any other remedies.

Other Fair Housing Litigation

During the previous five-year period, ten federal lawsuits were filed in the Central District of California - Eastern Division concerning housing units in San Bernardino County. Nine of those cases were against the owners, operators, and developers of covered multifamily apartment developments (greater than four units) and one against a private single-family rental. Disability was cited as a basis of discrimination in 7 of the 10 cases; followed by familial status in 3 cases; race in 2 cases; and retaliation in 1 case. Five of those cases were brought by the United African-Asian Abilities Club, which conducted accessibility testing on behalf of its members at the defendant apartment complexes and alleged violations of fair housing and ADA laws for failure to meet accessibility standards, architectural barriers, and failure to make reasonable modifications or accommodations for persons with disabilities to use and enjoy or have equal access to dwellings and facilities.

Table 24. 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 Disposition
Colton	United African Asian Abilities Club v. Cottonwood Ranch Partners, LP	5:17-cv-00672	04-08-17	05-14-17	Disability	Dismissed pursuant to confidential settlement
Grand Terrace	United African-Asian Abilities Club v. Osage Towers, LTD	5:17-cv-00674	04-08-17	05-30-17	Disability	Dismissed pursuant to confidential settlement
Highland	Ayala v. Bella Apartment, LLC	5:15-cv-01746	08-27-15	06-01-16	Familial Status	Dismissed pursuant to confidential settlement
Loma Linda	United African-Asian Abilities Club v. Loma Linda Heritage Associates	5:17-cv-00659	04-07-17	06-22-17	Disability	Dismissed pursuant to confidential settlement
Montclair	Dorsey v. Paseos at Montclair, LLC	5:18-cv-00643	03-28-18	11-02-18	Disability	Dismissed pursuant to confidential settlement
Rancho Cucamonga	Thompson v. National Community Renaissance of California	5:15-cv-02352	11-16-15	09-20-16	Race; Disability; Retaliation	Settled and dismissed following court ordered mediation
Rialto	United African Asian Abilities Club v. Jong Yee Huang	5:17-cv-00671	04-08-17	10-05-17	Disability	Dismissed pursuant to confidential settlement
City of San Bernardino	Carter v. Todd Silverstein	5:15-cv-01803	09-03-15	09-06-16	Familial Status; Race	Dismissed pursuant to confidential settlement
City of San Bernardino	Cuevas v. Mauro Cobos	5:16-cv-01459	07-06-16	08-30-17	Familial Status	Dismissed pursuant to confidential settlement (\$2,000 to each minor child plaintiff)
Twentynine Palms	Warner v. 29 Palms RealCorp	5:19-cv-00588	06-21-19		Disability	Pending; Trial set for 7-7-20

Source: Pacer.gov

PAST FAIR HOUSING GOALS AND ACTIVITIES

The County of San Bernardino last completed its Analysis of Impediments to Fair Housing Choice in 2015. At that time, the AI identified six impediments to fair housing choice. The impediments and recommended activities from the 2015 AI are shown in the table that follows, along with a report on the progress the County has made toward addressing these impediments since 2015.

Table 25. Impediments to Fair Housing Choice and Actions Taken Since 2015

Impediment	Actions Taken since 2015
<p>Impediment #1: Cost of Affordable Housing Limits Housing Choice</p> <ul style="list-style-type: none"> Develop a long-term strategy for affordable housing with measurable goals for housing production and preservation. The strategy should be developed with public input. As part of the affordable housing strategy, create a Housing Task Force which includes the County, municipalities, private developers and lenders, non-profit advocacy groups, fair housing organizations and community representative from throughout the County. The task force should include representatives from organizations that serve members of protected classes. Create collaborative partnerships among task force members to seek out a range of affordable housing resources. Complete a housing strategic plan by June 30, 2016. 	<ul style="list-style-type: none"> The County added 45 units of affordable housing to its regional housing to stock.
<p>Impediment #2: Aging Housing Stock Needs Preservation to Maintain Its Serviceability and Affordability</p> <ul style="list-style-type: none"> Develop programs and funding options that will provide new and rehabilitated affordable rental housing for lower income and protected class households. As part of the affordable housing strategy, develop a rehabilitation component to preserve the multi-family housing stock. Identify funding sources for rehabilitation that are not restricted by HUD. Research organizations currently providing rehabilitation services and, if feasible, involve them in the implementation of the housing strategy. The rehabilitation program should be operated by a for-profit or non-profit entity. 	<ul style="list-style-type: none"> The County allocated \$3,678,000 toward the construction of Horizons of Yucaipa, a 77-unit housing development with 50 units for low income seniors over 55. NSP3 funds totaling \$908,889 were allocated for Bloomington Grove, a development with 70 senior units and 84 low-moderate income units. The development includes a 6,500 square-foot library. HOME funds were used to develop the Loma Linda Vets project. This development will provide 44 affordable housing units for homeless veterans. The FY 2016-2017 CAPER noted that 9 extremely low income, 41 low income, and 23 moderate-income persons were served that year using NSP funds.

Impediment	Actions Taken since 2015
<p>Impediment #2: Aging Housing Stock Needs Preservation to Maintain its Serviceability and Affordability <i>(Continued)</i></p>	<ul style="list-style-type: none"> The Housing Authority is revitalizing two public housing sites – Waterman Gardens in San Bernardino and Valencia Grove in Redlands. The Housing Authority is in the process of converting its entire public housing portfolio from using a public housing funding program to a voucher funding program. By FY 2016-2017, 552 units had been converted.
<p>Impediment #3: Inadequate Supply of Permanent Supportive Housing for Special Populations Including Persons Who are Homeless, Persons with Disabilities, and Elderly Persons</p> <ul style="list-style-type: none"> Engage persons with disabilities and service organizations in creating the housing strategy development for persons with disabilities. Development projects should include supportive services essential to persons with disabilities. Through the Housing Task Force, explore programming that provides accessibility modifications to the elderly. Explore various types of housing for the elderly, including fair market rentals, subsidized rentals and supportive housing to include healthcare and other appropriate services. In partnership with the County of San Bernardino Homeless Partnerships, address the needs of homeless families through the Housing Strategy. Follow the County's 10-year plan to eliminate homelessness. Partner with public and private organizations to create policies that help the County meet the needs of the homeless. 	<p>Housing for Homeless Persons</p> <ul style="list-style-type: none"> In FY 2016-2017, ESG funds were used to provide housing rental assistance, shelter and services for 1,446 individuals who were homeless or at risk of homelessness. Of this number, 297 people participated in homeless prevention activities, 209 received rapid re-housing services, and 958 received shelter assistance. In FY 2015-2016, the County Board of Supervisors allotted \$250,000 on a Homeless Veterans Housing Initiative. In that year, \$218,074 was spent on motel vouchers, first and last month's rent and move-in deposits for 401 homeless veterans. In FY 2016-2017, the remaining \$31,926 was spent on 139 homeless veterans. The Homeless Veterans Housing Initiative saw the partnership of several organizations, to include CDH, the VASH program, Community Action Partnership (CAPS) and the Family Service Association (FSA). The County's Housing Support Program (HSP), which is a collaboration of the County's Housing Authority and KEYS Non-profit, provided 390 homeless families with permanent supportive housing. The San Bernardino Continuum of Care (CoC) serves those who are homeless and near homeless. The CoC supports shelters, transitional housing units, hotel/motel accommodations, dormitories and rental assistance. <p>Housing for Persons with Mental Illness</p> <ul style="list-style-type: none"> Ten HOME units at the Horizons at Yucaipa development were set aside for Mental Health Services Act Housing Program (MHSA) clients. Eleven units were created for MHSA clients at the Bloomington Grove development, an NSP 3 funded project. <p>Housing and other services for Persons with Disabilities</p>

Impediment	Actions Taken since 2015
<p>Impediment #4: Improvements Are Needed Between Planning Processes for Transportation Improvements and the Development of Affordable Housing</p> <ul style="list-style-type: none"> Examine existing planning processes to coordinate transportation and housing development and enable more transportation opportunities near affordable housing. 	<ul style="list-style-type: none"> In FY 2016-2017, 11 low-income individuals with disabilities received job training through the CDBG funded program "Fontana Rehabilitation Workshop Employment Training." As part of the Housing Collaborative, the County met with members of SBCTA to identify solutions pertaining to the impediment caused by transportation.
<p>Impediment #5: "NIMBY" (Not in My Backyard) Attitudes Toward Protected Classes</p> <ul style="list-style-type: none"> Encourage residents to engage productively with their neighbors, foster inclusive, safe and cohesive neighborhoods. Utilize community-based organizations as liaisons between governmental entities and individual residents 	<ul style="list-style-type: none"> In collaboration with private affordable housing developers, community meetings were held for the following projects to engage the community and garner support for the creation of affordable housing options: <ul style="list-style-type: none"> Arrowhead Grove, San Bernardino Golden Apartments, San Bernardino Horizons, Yucaipa Bloomington Apartments, Bloomington
<p>Impediment #6: Acts of Housing Discrimination/Lack of Knowledge of Fair Housing Rights and Responsibilities</p> <ul style="list-style-type: none"> Fair housing organizations should carry out targeted outreach to racial and ethnic minorities, and to concentrated areas of low-income people. Fair housing education should be targeted to help these groups understand: <ul style="list-style-type: none"> where are acts of housing discrimination; the protections provided for protected classes under the Fair Housing Act; how and where to report acts of housing discrimination; and remedies available to victims of housing discrimination, including potential monetary settlements. The County should monitor fair housing education efforts and report on their effectiveness as part of the annual CAPER submitted to HUD 	<ul style="list-style-type: none"> In FY 2016-2017, the Inland Fair Housing and Mediation Board provided counseling and mediation services to over 5,089 renters. The IFHMB also provided counseling to low-income individuals looking to purchase a home.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 25, along with implementation timeframes and responsible parties.

Impediment #1: Disparate Access to Opportunity Impacts People of Color

The analysis of access to opportunity indicated that, for several opportunity types, levels of access throughout San Bernardino County vary. 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, Latino, and Native American 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, Latino, and Native American residents live in neighborhoods with higher poverty, lower school proficiency, and worse environmental health than do poor White residents.

Comments received from some stakeholders and through the community survey support these findings. Some communities noted that, being a part of the unincorporated portion of the County, access to resources such as public services, etc. is limited. In other areas, including some with higher performing schools, lower poverty, or better labor market engagement, stakeholders noted that there is community opposition or lack of support for multifamily and/or affordable housing, making it more difficult for some groups to access resources there. While encouraging affordable housing options in high opportunity areas, as is described in Impediment #2, is an important fair housing goal, addressing resource gaps and fostering opportunity-in-place is also crucial. Many residents desire to stay within their communities where they have access to housing, transit, job centers, and social networks. Thus, a key aspect of fair housing is ensuring that these communities also have access to opportunity features such as quality schools, labor market engagement, and environmental quality.

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 #2: Insufficient Affordable Housing in Areas of High Opportunity Disproportionately Impacts Protected Classes

Another impediment to fair housing choice in San Bernardino County is the lack of affordable housing in areas of high opportunity. The county's supply of affordable rental and homeowner housing is particularly limited in areas of high opportunity like Highland, Montclair, Redlands, and Yucaipa in the valley, and in vacation areas such as Crestline and Joshua Tree. Specific housing types needed throughout the County include affordable long-term rental housing options, larger (2+ bedrooms) housing options for families, and housing with supportive services for seniors, people with disabilities, and people transitioning from homelessness.

The lack of affordable housing throughout the County is noted as a primary contributor to rising homelessness and is a top concern. Additionally, the lack of affordable housing disproportionately affects some protected classes more severely than others. Statistics show that Black and Latino households as well as senior households and households headed by people with disabilities are disproportionately likely to have a housing need and/or severe housing need and spend over 30 or even 50 percent of their income on housing.

Multiple factors contribute to the need for affordable housing in the County, including the area's growing population, the slow pace of affordable housing development relative to the area's growing need, and the loss of existing affordable housing. The county's population has grown significantly in recent years, due in part to people being pushed out of nearby markets like Los Angeles where housing costs are greater. The rising housing costs in these surrounding markets have made the County an increasingly attractive and relatively affordable location for those commuting to work in the Los Angeles area. Yet, housing costs in areas of the County with the best access to jobs have themselves increased significantly in recent years, as the construction of affordable housing has not kept pace with the rising need. Factors contributing to the limited development of new affordable housing include NIMBYism toward proposed affordable housing developments and declining interest from LIHTC developers. County stakeholders also described long wait lists and placement timeframes for publicly-supported housing. Finally, the loss of existing affordable housing has been driven by the prevalence of short-term rentals, particularly in vacation areas, which contribute to the loss of long-term rental housing for resident households. The lack of development of new affordable housing and the loss of existing affordable housing, in combination with the refusal of some landlords to accept vouchers, has meant that voucher holders in the County have great difficulty placing their vouchers, routinely taking four months or more to find acceptable housing.

The limited availability of affordable housing is particularly acute in urban areas with the highest levels of access to opportunity. Housing in the County is more affordable in remote areas; yet, these areas often lack access to job, transit, and needed services, such as medical care and grocery stores. While some residents living in rural areas frequently favor the isolation these areas provide, they also expressed concerns regarding access to needs such as healthcare, supportive services, and grocery stores.

Impediment #3: Levels of Residential Segregation are Increasing

In the analysis of segregation in San Bernardino County contained in this report, a dissimilarity index methodology found segregation levels for all racial and ethnic pairings to be in a moderate range. This finding is more noteworthy for the fact not that levels are currently moderate, but that they have been steadily increasing since at least 1990 and that this increase is true for all pairings studied. For example, the index value representing segregation between White and all Non-White residents increased from a value of 36.4 in 1990 to 46.1 currently. The Hispanic/White pairing experienced the greatest change between 1990 and 2010 as the index value increased by nearly 10 points from 39.9 to 49.8. The most extreme degree of segregation is between White and Black residents, with a current index value of 50.0. An index value of 50.0 means that, hypothetically, fully half of either the County's White or Black residents would have to move into a different community in order to achieve a statistically balanced population distribution. Another measure of increasing levels of isolation between the County's racial and ethnic groups is the increasing number of census tracts classified as "racially or ethnically concentrated areas of poverty" (RECAPs). The number of RECAP census tracts in the County steadily increased from just a couple in 1990 to 5 in 2010, to 9 currently. These census tracts each have a poverty rate of 40% or greater and a Non-White population of 50% or more.

Segregation can sometimes be a matter of choice: a household choosing to live near family members or in a community where a native language is spoken or where retail and restaurant establishments cater to specific ethnic preferences. However, segregation can also represent a lack of choice where households of a certain race or ethnicity end up clustering in certain neighborhoods because they are not welcome or able to access housing options elsewhere. In either of these cases, the isolation and insularity itself can create a barrier to healthy community relations if not also to housing choice. Increasing opportunities for positive interaction among diverse residents throughout the County can lead to greater trust among population groups and increase awareness of and access to a wider range of housing options.

Impediment #4: Community Education on Fair Housing is a Continuing Need

Knowledge of fair housing rights and resources is generally good in San Bernardino County. Public meeting attendees and stakeholders who were interviewed often had no trouble naming appropriate organizations in the region who assist with fair housing issues, such as the Inland Fair Housing and Mediation Board. In the survey conducted as part of this AI, 86.5% of respondents reported that they knew or somewhat knew their fair housing rights, although 42.5% reported not knowing where to file a housing discrimination complaint. Identical questions were asked of the public in a survey connected to the County's 2015 AI and results are generally consistent over this five-year interval. In 2015, 87.1% of respondents reported knowing or somewhat knowing their fair housing rights while 44.9% reported not knowing where to file a housing discrimination complaint. These results indicate that ongoing education efforts within the community have been successful, although the persistent gaps indicate a continuing need to provide education and resources. The diversity of the County's population suggests that at least some of this education around fair housing ought to be targeted to communities of color and people with limited English proficiency. This could take the form of multi-lingual resources and advertisements, but another factor is the strengthening of connections between the County and its fair

housing service providers (like IFHMB) with local organizations that serve groups known to be vulnerable to housing discrimination.

Impediment #5: People with Disabilities have Limited Housing Options

A community survey offered to County residents and stakeholders found that 45% of respondents reported a lack of housing options for people with disabilities. Over 85% of respondents noted that there was either a moderate or high need for housing for people with disabilities. Stakeholders serving clients with disabilities noted that persons with disabilities tended to be low income and include individuals whose primary source of income is Supplemental Security Income (SSI). Due to their low income, many persons with disabilities find it unaffordable to live alone. Publicly supported housing provides a limited opportunity for independent living, since rents are based on income. However, without public assistance, low income persons with disabilities tend to live with family members, roommates or a significant other. This suggests that the provision of additional units of affordable housing for disabled persons will alleviate the limited housing options.

Where housing is affordable in the County, transportation to important services may pose a challenge. Service providers note that persons with disabilities have difficulty accessing programs, grocery stores and other important resources due to limited transportation options. In the OmniTrans service area, paratransit services are limited to within $\frac{3}{4}$ mile of bus routes, and costs increase based on the distance of the trip. Similarly, ADA Direct access in the Public Transit of Victor Valley (VTA) limits curb-to-curb pick-up and drop off locations to within 2.25 miles of a fixed route, with fares increasing based on the distance of an origin/destination from a fixed route. The affordability and accessibility of transit services can add housing obstacles for persons with disabilities.

Table 26. Fair Housing Goals and Activities

Contributing Factors	Recommended Activities	Responsible Parties and Partners
<p>Impediment #1: Disparate Access to Opportunity Impacts People of Color</p> <p>Low school proficiency disproportionately impacts African American, Latino, and Native American residents</p>	<ul style="list-style-type: none"> • Fund supplemental youth education programs for low to moderate income children that address academic proficiency (Ongoing, beginning Q1, 2020) • Explore options for collaboration with local school districts to connect families with local community resource agencies, including tutoring services, housing providers, and adult education with the goal of removing students' barriers to learning. (Q1, 2021) 	<ul style="list-style-type: none"> • San Bernardino County • CDBG Participating Jurisdictions
<p>Educational and employment barriers limit economic opportunities</p>	<ul style="list-style-type: none"> • 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. (Q1, 2020) • Consider providing business and entrepreneurial support to new or expanding businesses that fill a market niche and create jobs for low-income residents. (Q1, 2020) • 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. (Q1, 2020) 	<ul style="list-style-type: none"> • San Bernardino County • CDBG Participating Jurisdictions
<p>Need for neighborhood revitalization in areas of low opportunity</p>	<ul style="list-style-type: none"> • During the Consolidated Planning process, identify place-based strategies focused on improving physical resources in specific, defined high-poverty areas. (Annually, beginning 2020) 	<ul style="list-style-type: none"> • San Bernardino County • CDBG Participating Jurisdictions
<p>Impediment #2: Insufficient Affordable Housing Supply in Areas of Opportunity</p>		
<p>Limited new rental housing construction</p>	<ul style="list-style-type: none"> • Continue using CDBG and HOME funds to increase and maintain the availability of high-quality, affordable rental housing through new construction and rehabilitation. (Ongoing, beginning 2020) • 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. (Ongoing, beginning 2020) • 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 	<ul style="list-style-type: none"> • San Bernardino County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
<p>Limited supply of affordable housing disproportionately impacts protected classes</p>	<ul style="list-style-type: none"> • competitiveness of their applications through letters of support, provision of data and information, gap financing, and other assistance. (Ongoing, beginning 2020) • Consider and adopt zoning code amendments that could increase possibilities for development of affordable housing. (2020) • Consider affordable housing bonds, development fees, or other options to support the development of an Affordable Housing Trust Fund (2020). • Consider offering low-interest loans or grants to rehabilitate distressed units in exchange for affordability restrictions; reductions in property taxes for landlords agreeing to long-term affordability restrictions; and other mechanisms to preserve existing affordable rental housing (2020). 	<ul style="list-style-type: none"> • San Bernardino County
<p>Housing is more affordable in remote areas, but these areas lack access to opportunity</p>	<ul style="list-style-type: none"> • In the routine monitoring of County-funded housing owners/operators, continue to ensure that affirmative marketing plans are in place, are adhered to, and are effective in promoting affordable housing opportunities to diverse groups of residents, including people of color, seniors, and people with disabilities (2020). • Use CDBG and HOME funds to increase the availability of high-quality, affordable rental housing with supportive services for seniors and people with disabilities (2020). • Continue to fund public services that increase access to healthcare, fresh and healthy food, and supportive services in areas with low access to opportunity (Ongoing, beginning 2020). • Continue to fund projects that expand or improve sidewalks, parks, trails, and other public facilities in areas with low access to opportunity. (Ongoing, beginning 2020) 	<ul style="list-style-type: none"> • San Bernardino County
<p>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</p>	<ul style="list-style-type: none"> • Adopt a local source of income protection ordinance. 	<ul style="list-style-type: none"> • San Bernardino County
<p>Stakeholder input indicates a need for improved coordination in planning for affordable housing between the County and its cities</p>	<ul style="list-style-type: none"> • Develop a strategy to support coordination with cities to support awareness of and participation in funding opportunities for affordable housing development and city involvement in County-supported projects. Ensure that there is a clear process by which cities know what to expect with regard to receiving funding for affordable housing development. 	<ul style="list-style-type: none"> • San Bernardino County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
<p>The prevalence of short-term rental housing, particularly in vacation areas, constricts the availability of rental housing and increases rental prices</p> <p>NIMBYism prevents proposed new developments</p>	<ul style="list-style-type: none"> Conduct a public planning process to develop policies to limit the negative impacts of short-term, whole-home rentals on the availability of affordable long-term rental housing. Develop educational programming with the goal of developing an understanding of affordable and workforce housing among county residents. 	<ul style="list-style-type: none"> San Bernardino County San Bernardino County
Impediment #3: Levels of Residential Segregation are Increasing		
<p>Increasing segregation patterns diminish housing options and impede community relations</p>	<ul style="list-style-type: none"> Continue using CDBG and HOME funds to increase and maintain the availability of high-quality, affordable rental and for-sale housing in racially diverse communities with good access to opportunity and community amenities. (Ongoing, beginning 2020) In the routine monitoring of County-funded housing owners/operators, continue to ensure that affirmative marketing plans are in place, are adhered to, and are effective in promoting affordable housing opportunities to diverse groups of residents, including people of color, seniors, and people with disabilities (Ongoing, beginning 2020). Explore options for a communitywide events (such as the Civic Dinners or Quad Cities Big Table models), that encourage interaction among diverse participants in neighborhoods throughout the region. Other events centered around food, music, and cultural exchange can also be supported and promoted to highlight the positive attributes of diverse neighborhoods throughout the County. (Ongoing, beginning 2021) 	<ul style="list-style-type: none"> San Bernardino County
Impediment #4: Community Education on Fair Housing is a Continuing Need		
<p>Residents have an ongoing need for education regarding fair housing rights and resources</p>	<ul style="list-style-type: none"> Working with a contracted provider, the County should annually design and/or update and coordinate delivery of a fair housing education program that reaches the public with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint. (Ongoing, beginning Q1, 2020) 	<ul style="list-style-type: none"> San Bernardino County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
<p>Multi-lingual resources and stronger connections within communities of color and among people with limited English proficiency will facilitate deeper penetration of fair housing education to vulnerable communities.</p>	<ul style="list-style-type: none"> • Translate fair housing education materials to the variety of languages represented in the County. (Q1, 2021) • Continue fair housing education activities, with a focus on expanding the pool of partners the County works with (ex: churches, schools, LEP communities/ organizations) to ensure reliable channels of communication are established with communities of color and people with limited English proficiency. (Q1, 2021) 	<ul style="list-style-type: none"> • San Bernardino County
<p>Impediment #5: People with Disabilities Have Limited Housing Options</p>		
<p>Insufficient accessible housing exists to serve the needs of people with disabilities</p>	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. (Ongoing, beginning Q1 2020) <ul style="list-style-type: none"> a. When new accessible housing is proposed by a developer, organization, or agency, express support (through letters of support and/or certifications of consistency with the Consolidated Plan) wherever possible. b. Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units. • Meet with local providers of accessible housing and permanent supportive housing to discuss resources available and potential for collaboration on future proposed housing developments. (Q1, 2021) • As the Countywide Plan is developed and updated, adopt policies to locate future subsidized housing for people with disabilities along fixed transit routes. (Q2, 2021) 	<ul style="list-style-type: none"> • County of San Bernardino
<p>There is a continued need for transit improvements to expand access to jobs, shopping, and other opportunities and resources for people with disabilities</p>		<ul style="list-style-type: none"> • County of San Bernardino • Housing Authority of the County of San Bernardino