City of San Bernardino California

ANALYSIS OF IMPEDIMENTS

TO FAIR HOUSING CHOICE

2025 – 2029

EXECUTIVE SUMMARY

The Analysis of Impediments (AI) to Fair Housing Choice for the City of San Bernardino is a critical examination aimed at identifying and addressing barriers that hinder equal housing opportunities for all residents. This report is part of the City's commitment to fostering an inclusive community in which everyone has access to housing as a basic human need.

The AI sets out to accomplish several key objectives, beginning with an analysis of the current conditions affecting fair housing in San Bernardino. Next, an evaluation of the impact of existing policies and practices on affordable housing and housing availability for special needs households is conducted. Finally, the AI identifies potential impediments to fair housing choice and recommends actions the City can undertake to mitigate or eliminate these barriers.

Data was gathered through surveys, community forums, stakeholder engagement, and comprehensive data analysis from various sources to ensure a thorough understanding of the issues at hand. Major barriers identified include a lack of housing stock, a lack of affordable housing for lower income households, overcrowding, and demonstrates a need for more fair housing education.

To effectively address these challenges, the report recommends five (5) goals and related actions aimed at enhancing the overall accessibility and affordability of housing in the community.

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Chapter 1: Introduction

The City of San Bernardino (the City) is a recipient of funds from the U.S. Department of Housing and Urban Development (HUD). As such, the City is required to conduct an Analysis of Impediments to Fair Housing Choice (AI).

A. What are Impediments to Fair Housing Choice?

Fair housing is a condition in which people of similar income levels, living in the same housing market, have a similar range of choice regardless of characteristics protected under State and Federal laws. Traditionally, the U.S. Department of Housing and Urban Development has defined impediments to fair housing choice as:

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

These actions or omissions may violate fair housing laws, hinder fair housing choices, or restrict housing opportunities for individuals with legally protected characteristics. For instance, a real estate agent refusing to sell a home to a family of color based on their race is a clear violation of federal and state fair housing laws. Sometimes, however, barriers to fair housing choice are more subtle.

In the pursuit of affirmatively promoting equal housing opportunities, communities must work to remove or to mitigate impediments to fair housing choice. The City of San Bernardino remains committed to providing fair housing access and opportunities to all residents, to complying with all applicable laws, and to conducting business both fairly and impartially. This includes completion of this report, the Analysis of Impediments to Fair Housing Choice (AI). This AI abides by the recommended scheme of analysis and format established in HUD's Fair Housing Planning Guide.

B. Fair Housing Defined

Fair housing is the right of an individual to freely choose their own housing without unlawful discrimination. These rights are protected by both Federal and State laws, and equal access to housing is a longstanding goal of both the United States and the State of California. Equal access to housing, also referred to as housing choice, remains fundamental to meeting essential needs and pursuing personal, educational, employment, and other goals.

C. At a national level, federal fair housing laws prohibit discrimination in the sale, rent, lease, and negotiation of real property, based on race, color, national origin, religion, sex, familial status, and disability. What is an Analysis of Impediments to Fair Housing Choice?

An Analysis of Impediments (AI) to Fair Housing Choice is an assessment of how laws, policies, real estate practices, and local conditions affect the location, availability, and accessibility of housing. The analysis of their impact on housing choice can highlight areas where corrective actions might broaden the housing options of persons protected by fair housing laws.

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D. What is the Purpose of this Report?

Through the AI, jurisdictions examine the affordability of housing with an emphasis on affordability for households with annual incomes classified as extremely -low-to-moderate income. Moderate income is defined as equal to or less than 80 percent of the adjusted Area Median Family Income (AMI) as most recently published by the U.S. Department of Housing and Urban Development (HUD). Pursuant to 2024 San Bernardino County HUD Income Limits, 80 percent of the AMI in the City of San Bernardino, adjusted for family size, is $82,000 for a family of four.

This AI has three major goals:

Goal 1: Provide an overview of the City and current conditions as they impact fair housing choice.

Goal 2: Review the City's policies and practices as they impact fair housing choice and the provision of housing, specifically affordable housing, and housing for special needs households.

Goal 3: Identify impediments to fair housing choice and actions the City will take to remove those impediments or to mitigate the impact they have on fair housing choice.

Fulfilling these goals involves:

- A review of the laws, regulations, and administrative policies, procedures, and practices of the City.
- An assessment of how those laws affect the location, availability, and accessibility of housing.
- An assessment of conditions, both public and private, affecting fair housing choice.

E. Legal Framework

Fair housing choice seeks to ensure individuals the opportunity to choose where they wish to live. To guarantee that all individuals and families are given the opportunity of equal access to housing, the federal government and the State of California have enacted the following laws to prohibit subtle and overt forms of housing discrimination. HUD's Office of Fair Housing and Equal Opportunity has played a lead role in enforcing the Act since its adoption in 1968. The Act prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, national origin, sex, familial status (presence of child under the age of 18, and pregnant women), and/or disability.

Federal Laws

Federal Fair Housing Act (Fair Housing Act of 1968 and Fair Housing Amendments Act of 1988) (42 U.S. Code §§ 3601-3619, 3631)

The Fair Housing Act is the protection against discrimination in housing on the federal level. After a lengthy legislative battle, urban riots, and the assassination of Dr. Martin Luther King Jr., the Act was enacted in 1968. It extended the general discrimination protections included in the 1964 Civil Rights Act into the housing market. The Act prohibits discrimination in housing based on a person's race, color, religion, sex, disability, familial status, or national origin. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

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The Act covers "dwellings" which are defined as structures designed or occupied as residences or land offered for sale where a residence will be built. A "dwelling" is broadly defined and can include a homeless shelter or a summer home. In some circumstances, exemptions to the Act include the following: owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

Equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the Act, to pursue personal, educational, employment, or other goals. Other federal laws relevant to fair housing are included in Appendix A.

Reasonable Accommodations and Accessibility

The Fair Housing Amendments Act of 1988 requires housing providers to make reasonable accommodations if it is necessary for people with disabilities to live in and use the housing. Accommodations may include interior or exterior modifications, such as installation of ramps, or modifications of rules, policies, or practices, such as allowing guide dogs in a building that has a no pet policy.

California Laws

The California Civil Rights Department (CRD), formerly the Department of Fair Employment and Housing (DFEH), is the entity responsible for enforcing the state's fair housing laws.

Fair Employment and Housing Act (FEHA) (Government Code §§ 12955 et seq.)

The California Fair Employment and Housing Act is a California statute that prohibits employment and housing discrimination based on race, color, ancestry, national origin, citizenship, immigration status, primary language, religion, mental or physical disability, sex and gender, sexual orientation, gender identity and expression, genetic information, marital status, familial status, source of income, and age.

FEHA applies to various entities involved in housing, such as landlords, tenant screening companies, property management firms, real estate agents, home sellers, builders, mortgage lenders, and housing authorities.

Unruh Civil Rights Act (California Civil Code §§ 51 et seq.)

The Unruh Civil Rights Act prohibits discrimination by all business establishments, including housing accommodations, based on race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status. The California Supreme Court has held that protections under this legislation are not necessarily restricted to these specific characteristics.

Ralph Civil Rights Act (California Civil Code § 51.7)

The Ralph Civil Rights Act prohibits discrimination and protects individuals from acts of violence, intimidation, and harassment against themselves or their property based on a person's actual or perceived protected characteristic. The act provides legal recourse for victims of hate violence which can be graffiti, vandalism, or property damage; assault or attempted assault; and verbal or written threats.

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Bane Civil Rights Act (California Civil Code § 52.1)

The Bane Civil Rights Act prohibits interference or attempted interference through threats, intimidation, or coercion, with someone's state or federal statutory or constitutional rights, including fair housing. For example, the Act can protect against discriminatory landlords and intentional barriers to equal housing access.

Senate Bill 329

Signed by Governor Gavin Newsom, this bill expands the definition of "source of income" to include income paid to a housing owner or landlord on behalf of a tenant, including federal, state, or local public assistance or subsidies. Therefore, SB 329 expands fair housing protections to recipients of Section 8 vouchers.

California Civil Code Section 1940.3

This protects individuals from housing discrimination based on their immigration or citizenship status. Under the Civil Code, landlords are forbidden from questioning potential residents about their immigration and citizenship status while local jurisdictions are forbidden from passing laws that would direct landlords to do so.

Government Code Section 1135

This prohibits discrimination against individuals based upon their protected characteristics in any state-funded programs.

Government Code Sections 65008 and 65580-65589.8

These sets of Government Code provide increased fair housing and equal access protections. State law requires local jurisdictions to address housing for special needs groups which include:

- Housing for persons with disabilities
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing.
- Housing for extremely low-income households. Including single-room occupancy units
- Housing for persons with developmental disabilities

F. Methodology & Organization

Pursuant to HUD guidance, jurisdictions are not required to collect new data and can use existing data to analyze potential impediments to fair housing choice. For this AI, the City employed the following data sources:

American Community Survey (ACS) 2007-2011 5-Year Estimates and 2017-2021 5-Year Estimates, U.S. Census Bureau. ACS data are obtained from a nationwide survey on population characteristics, including demographic, social, economic, and housing conditions. The 5-Year Estimate includes 60 months (about 5 years) of collected data for all population size areas. As compared with other sample sizes (1-Year and 3-Year), the 5-Year Estimate utilizes the largest sample size and is the most reliable despite being the least current.

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Community Reinvestment Act (CRA) Rating Search, Federal Financial Institutions Examination Council (FFIEC). CRA ratings for financial institutions include substantial noncompliance, needs to improve, satisfactory, and outstanding. These ratings are supervised by regulatory agencies including the Federal Reserve, Office of the Comptroller of the Currency, Federal Deposit Insurance Corporation, and Office of Thrift Supervision.

Comprehensive Housing Affordability Strategy (CHAS) 2016-2020 5-Year Estimates. Developed by the U.S. Census Bureau for the U.S. Department of Housing and Urban Development (HUD), the CHAS database contains vast information on low- and moderate-income (LMI) households, as well as housing problems (i.e., cost burden, overcrowding, and substandard conditions). In September 2024, HUD published CHAS data based on the 2017-2021 ACS. This Five-Year (2017-2021) dataset is used by HUD, state governments, and local governments to examine housing needs and make informed funding decisions. CHAS data is available at the state, county, place, and census-tract level. This report utilizes "place" data by examining data specific to the City of San Bernardino.

Decennial Census 2000, 2010, and 2020 U.S. Census Bureau. The Decennial Census provides comprehensive data describing demographic and housing characteristics.

Diversity and Disparities: Residential Segregation, Brown University. The Diversities and Disparities Project provides independent and peer-reviewed research examining changes in American society. Data on the Index of Dissimilarity, which reflects residential segregation, throughout the last several decades in the City is provided by this source.

Home Mortgage Disclosure Act (HMDA) Data Browser 2022, Federal Financial Institutions Examination Council (FFIEC). Developed by the FFIEC, the HMDA Data Browser provides detailed information about mortgage loan applications and applicants. It includes the status of a loan, such as denied, along with race, age, sex, and ethnicity of the applicant. Users can also examine the name of the lending institution. This data is helpful in assessing the potential existence of discriminatory lending practices.

Point-in-Time Count 2024, County of San Bernardino Homeless Partnership (SBCHP). The Point-in-Time count seeks to identify how many people are experiencing homelessness, along with other details about the experiences of people currently homeless. For example, the count records people's shelter situations along with demographic characteristics, such as race, ethnicity, age, and gender.

San Bernardino Consolidated Annual Performance and Evaluation Reports (CAPER). The CAPER is an annual report that the U.S. Department of Housing and Urban Development (HUD) requires from grantees to assess their yearly performance. The CAPER reports on the City's progress towards meeting its goals through its grant activities.

San Bernardino Housing Element (2021-2029). The Housing Element is a required component of the City's General Plan, which is required by the California Department of Housing and Community Development (HCD). It outlines the City's housing needs and strategies to address those needs.

San Bernardino Zoning Ordinance. The Zoning Ordinance is a system of local laws that dictate how land in the City can be used.

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Organization of the Report

This report is divided into eight chapters, including this introduction, as described below.

Chapter 1: Introduction explains the purpose of the AI, describes its methodology and organization, and outlines its legal framework.

Chapter 2: Public Participation discusses outreach efforts undertaken for the development of the AI. Outreach results include comments received during the public review draft AI, community engagement and stakeholder meetings.

Chapter 3: Community Profile presents demographic information and income characteristics in the City, including the number and percentage of people by age, ethnicity, familial status, and disability. The housing profile includes the number of housing units by type, cost, overcrowding condition, and housing cost burden. Income characteristics include the distribution of low- and moderate-income population by census tract.

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

Chapter 5: Public Policies analyzes public policies and actions that may impede fair housing in the city, such as those contained in the City's Housing Element, Land Use Element, and Zoning Ordinance.

Chapter 6: Fair Housing Profile provides information on the institutional structure of the homeownership and rental markets in the City. It also includes local, state, and federal data on fair housing complaints.

Chapter 7: Fair Housing Progress evaluates the progress toward recommendations made in the previous AI's Action Plan.

Chapter 8: Fair Housing Action Plan summarizes the findings regarding fair housing issues in the City and provides recommendations for furthering fair housing practices.

Appendix A: Federal Fair Housing Laws describes additional fair housing laws not covered by this report.

Appendix B: Community Engagement Summary describes the community outreach program and summarizes input from residents, agency representatives, and other stakeholders.

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Chapter 2: Public Participation

The public participation process for the AI sought input from community members and stakeholders. Methods included on-line surveys for community members, stakeholder interviews, and a community meeting. The AI development engagement process took place during the fall and early winter, through December. The process concluded with a 30-day public review period and a public hearing for adoption of the proposal study.

A. Community Survey

KEY TAKEWAY: Most Important Community Needs:

- Homeless shelters or transitional housing, affordable rental housing, and accessibility improvements, emergency/overnight shelters, and transitional housing.
- Community centers, childcare centers, and park and recreational facilities.
- Water/Sewage Improvements, tree planting and urban greenery, street/alley/sidewalk improvements, and safety improvements such as street lighting and traffic calming measures.
- Job creation / job generating businesses, job readiness programs, and college readiness programs.

The City prepared a Community Needs Survey in both English and Spanish and provided online links and outreach to local community and social service groups to reach a broad population. The survey link was posted on the City's website, stakeholder newsletters, social media posts and flyers distributed at community events. The survey period was from 10/24/24 to 1/17/25. The City received approximately 240 responses, of which 88.25 percent were San Bernardino residents.

The survey sought community input on the City's most pressing needs in the areas of housing, community facilities, infrastructure, homelessness, community services, and economic development.

A summary of the English and Spanish survey results is included in Appendix B –Community Engagement Summary.

B. Stakeholder Interviews Survey

The City also distributed the online Community Needs Survey to stakeholders to gather critical input from a multitude of perspectives. They represent housing, health, education, employment, faith-based, service delivery, and professional service organizations. The survey posed questions about community facilities, community services, infrastructure, residents with special needs, neighborhood services, business and job services, housing services, and housing facilities. It also contained open-ended questions with the purpose of gathering in-depth perspectives from stakeholders.

Stakeholder interviews included representatives from the following organizations:

- City of San Bernardino Community Department of Community Development & Housing
- Rise of A Fallen Angel, INC
- Neighborhood Housing Services of the Inland Empire
- Center for Employment Opportunities
- Neighborhood Partnership Housing Services
- El Sol Neighborhood Educational Center
- NPHS Community Redevelopment
- Inland Fair Housing and Mediation Board
- Vision y Compromiso
- The Salvation Army
- TELACU
- United Contractors, Inc.

KEY TAKEWAY: Critical Needs Identified by Stakeholders

- Affordable Housing, Job Training and Employment Opportunities, Public Safety and Crime Prevention.
- Health Care Services, Educational Programs, and Public Transportation.
- Homeless Prevention and Supportive Services, Housing Rehabilitation, Neighborhood Revitalization, and Public Services (e.g., Childcare, Health Services).

Affordable Housing Availability

- Strong concern over lack of affordable rental units, particularly for extremely low-income households and working families.
- High demand for permanent supportive housing for individuals experiencing homelessness.

Homelessness Services & Prevention

- Critical need for more emergency shelter beds, transitional housing, and wraparound services.
- Emphasis on mental health, substance use recovery, and job readiness as essential components.

Access to Supportive Services

- Calls for better coordination and availability of services such as case management, food access, legal aid, and financial counseling.
- Need for service hubs located within underserved neighborhoods.

Workforce Development & Economic Stability

- Stakeholders identified job training, youth employment programs, and adult education as critical for breaking poverty cycles.
- Barriers include lack of transportation, childcare, and digital literacy.

Safe and Quality Housing Conditions

- Persistent concerns about substandard housing, overcrowding, and code enforcement in older housing stock.
- Need for rehab programs for low-income homeowners and renters.

Transportation Access

- Limited or no public transportation options in certain areas affect job access and service utilization.
- Stakeholders advocated for expanded and subsidized transit options.

Youth & Family Services

- Critical gaps in after-school programs, early childhood education, and behavioral health support for children and teens.
- Stakeholders highlighted rising youth mental health concerns post-pandemic.

Community Safety and Engagement

- Concerns about rising crime, gang activity, and need for more community policing and prevention programs.
- Need for spaces and programs that build community trust and cohesion.

Fair Housing Education & Enforcement

- Stakeholders noted low awareness of fair housing rights and limited access to complaint resources.
- Need for multilingual outreach, workshops, and legal support.

Access to Healthcare and Mental Health

- Emphasis on expanding access to affordable healthcare and mental health clinics, especially in rural and underserved neighborhoods.
- Integration of health services into housing and community programs is recommended.

C. Community Meetings

Community meetings were attended by representatives from Upwards, Neighborhood of Housing Services of Inland Empire (NHSIE), Inland Congregations United for Change, San Bernardino Police Department, Homeless Services, Housing Authority of the County of San Bernardino (HACSB), and Neighborhood Partnership Housing (NPHS). There was an online community engagement meeting held on December 19th, 2024, at 10:00 am.

Comments from participants fell into the following re-occurring themes: Affordable housing, need for community and homeless/homeless prevention services, jobs and employment, housing rehabilitation needs for low-income homeowners, and infrastructure needs. A summary of the input received is included in Appendix B – Community Engagement Summary.

D. Reaching Underrepresented Populations

To maximize participation, the City employed multiple engagement methods, including online surveys for residents and stakeholders, a community meeting, and public hearings. This multi-faceted approach ensured that different segments of the population had the opportunity to participate in the process, regardless of their preferred method of engagement. The use of both online and in-person methods helped to reach a wider audience and accommodate various preferences and needs.

Limited English Proficiency

To ensure that individuals with limited English proficiency were included in the public participation process, the City prepared the Community Needs Survey in English and Spanish. Outreach efforts included posting the survey link on the City's website, stakeholder newsletters, social media posts, and distributing flyers at community events. This approach helped to reach a broader population, including Spanish-speaking community members. Additionally, the City ensured that key documents and information were available in both languages to facilitate better understanding and participation.

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Persons with Disabilities or Special Needs

The City made efforts to include persons with disabilities or special needs by engaging with a diverse range of stakeholders through interviews and surveys. Stakeholders represented various sectors, including housing, health, education, employment, and service delivery organizations. These stakeholders provided critical input on the needs of residents with special needs, ensuring their perspectives were considered in the AI development process. The City also ensured that community meetings and public hearings were accessible by providing online methods of engagement.

E. Public Review and Hearings

The AI was completed concurrently with the City's 2020-2025 Consolidated Plan. Two public hearings were held on June 4, 2025, and June 18, 2025. A public review draft and comment of the AI and the Consolidated Plan was available for a 30-day review period from May 1, 2025, through June 1, 2025. A public review draft of the AI and the Consolidated Plan was available for a 30-day public review period from May 1, 2025, through June 1, 2025. Public Hearings were advertised in the San Bernardino Sun and El Chicano. The AI was also made available on the City's website, City of San Bernardino Public Information Center, Community and Economic Development Department, and Feldheym Central Library. All written comments received relating to impediments to fair housing will be documented and reviewed by the City. The City Council is responsible for holding a public hearing to discuss and adopt the final AI report.

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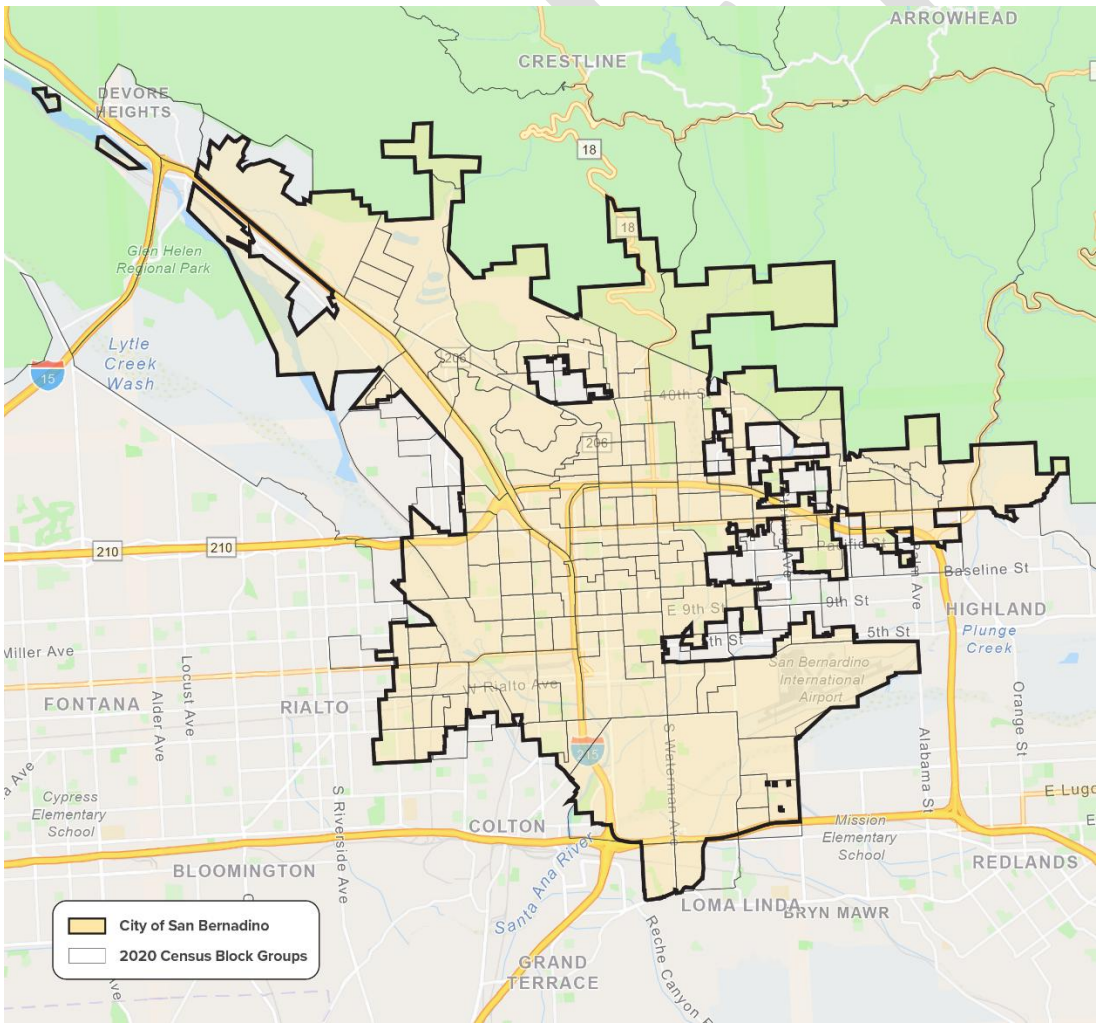
Chapter 3: Community Profile

Population increase is in line with County and State projections

Various characteristics affect housing choice for people and households with similar income levels, in the same housing market. Therefore, understanding the social, racial, economic, and other population characteristics and how they change over time is crucial to evaluating current and future housing needs and housing choice among characteristically different populations and households. The City of San Bernardino is the most populous city in the County of San Bernardino and one of the oldest communities in the State of California. Throughout the years, the City has experienced economic vitality, built on agriculture, railroads, and distribution. The City experienced significant change in the latter half of the 1900s, with changing market conditions, high rates of population growth, and other social, economic, and cultural changes throughout the Inland Empire. While these changes have impacted most people, they have had larger impacts on vulnerable populations.

This Community Profile compiles information about population change, incomes, household characteristics, and housing costs, all of which influence housing choice.



Map 1: City of San Bernardino, City Boundaries

A. Demographic Summary

Information in this section is primarily based on the 2017-2021 American Community Survey (ACS). In some cases, data from the 2007-2011 ACS estimates and the 2000 U.S. Census have been used to detect trends.

220,821 Total Population	**68% Hispanic or Latino**	**33,820 LMI Households**
49% Homeowners	**51% Renters**	**$55,372 Median HH Income**

Sources: 2017-2021 ACS 5-Year Estimates and 2017-2021 CHAS

B. Population Growth

Insight into the changing characteristics of the City's population will aid in implementing policies that best suit the community's needs and drive data-informed decisions. Population increase over time is shown in Table 1, along with a comparison to the County of San Bernardino and the State of California. Between 2011 and 2021, each jurisdiction (City, County, and State) saw an increase in population. According to 2021 ACS data, the City's population was 220,821, a 5 percent increase from 2011. The County and State experienced 7 percent increases in population, closely in line with the City's change.

Table 1: Regional Population Increase

	2000	2011	2021	% Change 2011-2021
City	185,388	210,100	220,821	5%
County	1,709,434	2,023,452	2,171,071	7%
State	33,871,648	36,969,200	39,455,353	7%

Source: 2000 U.S. Decennial Census, 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

C. Age Characteristics

Age is an important factor when evaluating housing needs of a community. As people age, they pass through different stages associated with changing family types and sizes, education and training that influence earning capacity, physical abilities, mental faculties, and overall independence. Together, these and cultural norms correspond to different housing needs over time. The ability to meet those needs depends on available housing options in both the rental and ownership markets.

Key Takeaways

Diverse housing options that apply to young and middle-aged adults, families with children, and aging adults are very important to the City's three largest age groups.

Largest Age Groups in Order:

- 25 to 44 (30%)*
- 5 to 17 (22%)*
- 45 to 64 (21%)*

Table 2: Age Characteristics				
	City	City %	County	County %
Under 5	15,159	6.86%	149,407	6.88%
5 to 17	47,512	21.52%	424,577	19.56%
18-24	24,683	11.18%	219,421	10.11%
25-44	65,557	29.69%	616,301	28.39%
45-64	47,084	21.32%	510,458	23.51%
65 or older	20,826	9.43%	250,907	11.56%
Total	**220,821**	**100.00%**	**2,171,071**	**100.00%**

Source: 2017-2021 ACS 5-Year Estimates

D. Race and Ethnicity

Race and ethnicity can have implications for housing choice for reasons that can include discrimination or economic variables that tend to correlate with race. While race and ethnicity are similar concepts used to categorize population, race is based on shared physical traits and common ancestry while ethnicity focuses on shared cultural practices such as language and religion. For example, persons who identify as ethnically Hispanic may share characteristics such as a common language, regional origin, and belief system; however, a person can be both ethnically Hispanic and identify as white or Black.

According to 2021 ACS data, the largest racial population group in the City is white at 45 percent, while 68 percent of the population identified as Hispanic or Latino of any race. Between the years 2011 and 2021, the City experienced significant changes in race populations. The largest increase of population in a single racial group was Native Hawaiians and Pacific Islanders, who experienced a 54 percent increase in change but make up a small portion of the overall population at just 0.3 percent. On the other hand, the largest population decrease in racial groups was Black or African American at a 12 percent decrease. The most significant change between 2011 and 2021 was the number of people identifying as two or more races, which increased dramatically by 178 percent. Almost 24,000 individuals in the City identify as two or more races, an indication of further cultural integration.

Table 3: Current Race & Ethnicity Comparison					
	2011	%	2021	%	% Change
White	94,041	45%	98,649	45%	4.90%
Black or African American	31,257	15%	27,627	13%	(11.61%)
American Indian and Alaska Native	1,809	1%	2,304	1%	27.36%
Asian	9,227	4%	8,709	4%	(5.61%)
Native Hawaiian/Pacific Islander	441	0%	680	0%	54.20%
Some other race	64,741	31%	58,957	27%	(8.93%)
Two or more races	8,584	4%	23,895	11%	178.37%
Total	**210,100**	**100%**	**220,821**	**100%**	**5.10%**
Hispanic or Latino (of any race)	123,611	59%	149,165	68%	20.67%
Not Hispanic or Latino	86,489	41%	71,656	32%	(17.15%)

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimate

Index of Dissimilarity

Residential segregation refers to the degree to which groups live separately from one another. Segregation is complex, difficult to generalize, and influenced by many factors. Individual choices can certainly be a cause of segregation, such as when residents choose to live among people of their own race/ethnic group. This does not mean that they prefer ethnically homogeneous neighborhoods, but that they feel more comfortable where members of their group are commonly found. However, individual choices may also be constrained by factors outside an individual's control. A large factor in residential segregation is related to housing market dynamics. Availability of affordable housing and discrimination can also affect residential segregation.

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index of dissimilarity is a method used to measure segregation between two groups, reflecting the relative distribution of each group across census tracts in the same area. A high dissimilarity reflects separation, meaning that the two groups tend to live in different tracts, while a low dissimilarity reflects integration. Dissimilarity ranges from 0 to 100, with a value of 60 or above considered very high segregation, 40 to 50 considered moderate segregation, and 30 or below considered fairly low segregation.

Table 4 represents dissimilarity indices for the City. In 2020, segregation was highest between Asians and Hispanics at an index of 40.4, followed by white and Asian populations, with an index of 34.9. The lowest segregation was between black and Hispanic residents with an index of 24.5. Between 2010 and 2022, residential segregation was unchanged between the Hispanic and Asian population.

Table 4: Index of Dissimilarity					
	1980	1990	2000	2010	2020
White - Black	65.1	49.8	37.4	33.1	26.6
White - Hispanic	53.4	49.7	43.1	39.4	34.8

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White - Asian	26.6	32.2	38.4	36.6	34.9
Black - Hispanic	41.7	31.2	25.1	24.6	24.5
Black - Asian	59.5	36.3	35.2	32.8	33.5
Hispanic - Asian	49.5	38.1	38.6	40.4	40.4

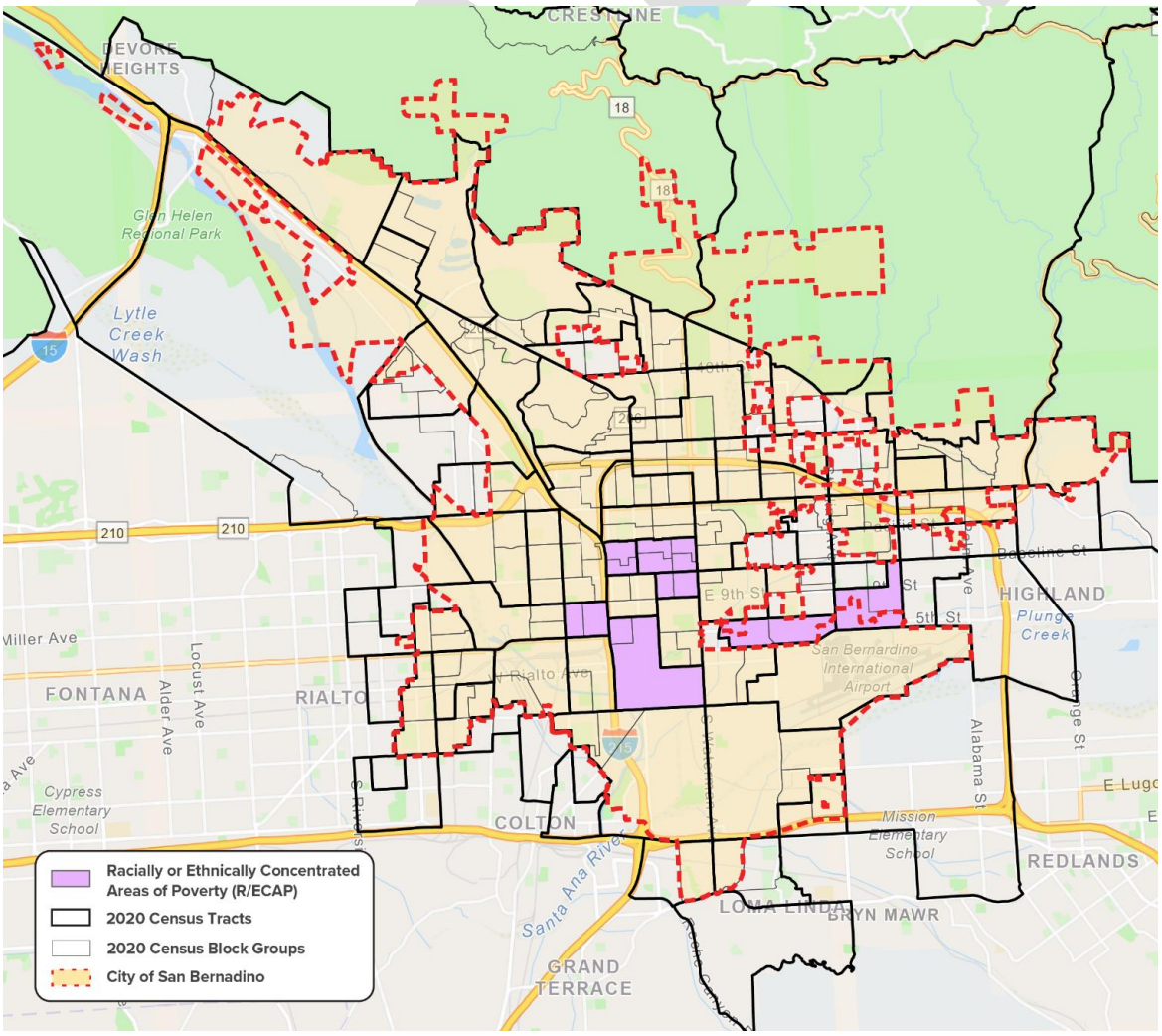
Source: Brown University, Diversity and Disparities, American Communities Project

Racially or Ethnically Concentrated Areas of Poverty

HUD defines racially or ethnically concentrated areas of poverty (R/ECAPs) as census tracts with a non-white population of 50 percent or more, and a poverty rate that either exceeds 40 percent of the population or is three or more times higher than the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Poverty has an adverse impact on housing choice. Limited access to and availability of affordable housing can compromise health, safety, and services that households need to live.

Racially/Ethnically Concentrated Areas of Poverty by Census Tract in the City of San Bernardino are shown in Map 2 and include:

- 4800
- 5701



Map 2: Racially or Ethnically Concentrated Areas of Poverty (R/ECAP), City of San Bernardino

Language Spoken

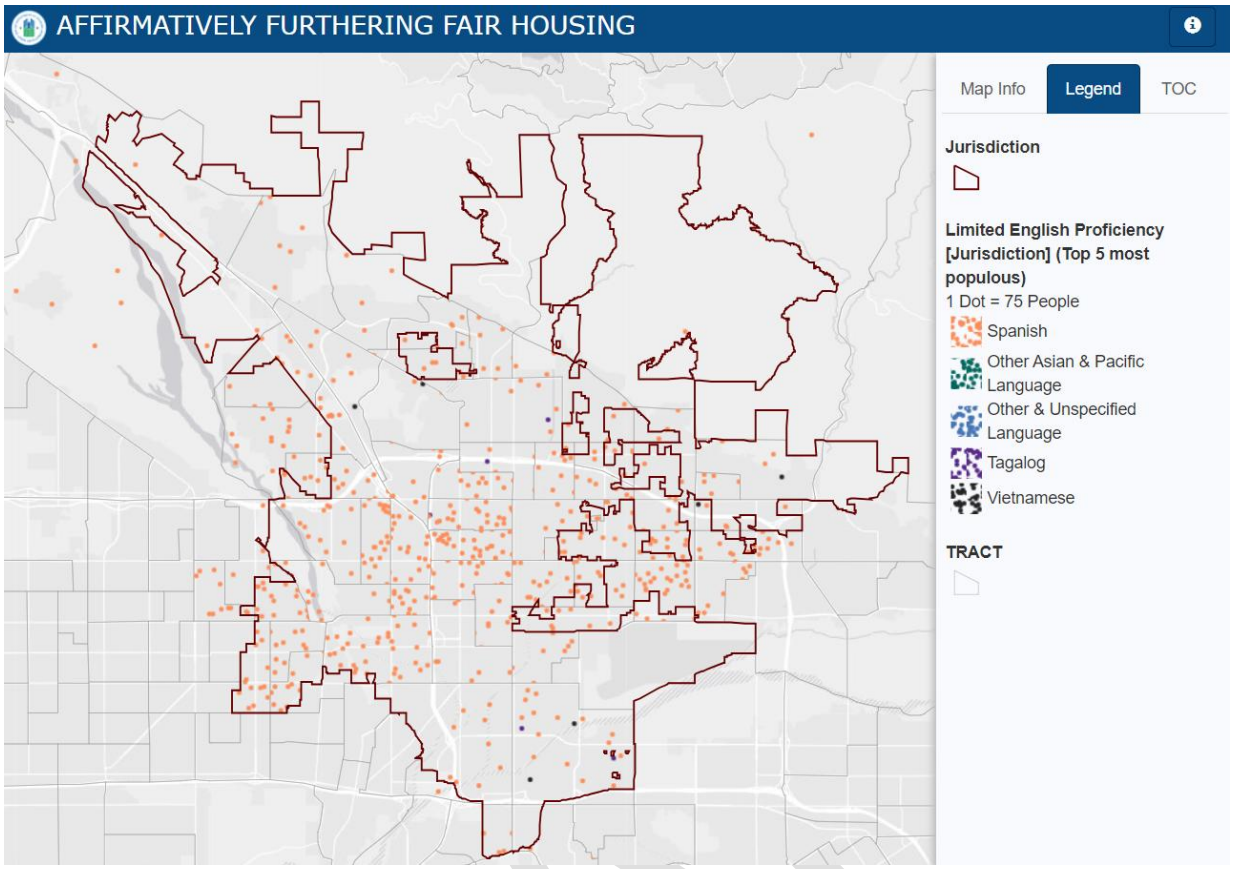
Housing may not be refused based on a resident's birthplace or ancestry, nor can housing providers take advantage of a person's inability to read, write, speak, or understand English to deny access. Despite this, those with limited English proficiency (LEP) can face unique challenges in meeting their housing needs. There are several ways in which programs and statutes work to bridge the gap. For example, under Title VI of the Civil Rights Act of 1964, federally assisted housing providers must afford meaningful access to people with LEP. This condition applies to HUD funds that are allocated to the City.

While housing needs do not vary with language spoken, language is an important population characteristic because it may influence discriminatory practices and should be considered when establishing goals and actions to further fair housing. Of the City's total population, 47.8 percent speak only English, 47.7 percent also speak Spanish, 3.1 percent speak Asian and Pacific Islander languages, and less than one percent speak other Indo-European languages or other non-specified languages. Of the total population, almost 18 percent speak English less than very well.

Table 5: Language Spoken at Home (persons 5 years and older)

	Number	% of Population (5+ Years)
Population 5 years and over	205,662	**100%**
English Only	98,351	**47.8%**
Language Other than English	107,311	**52.2%**
Speak English less than "very well"	36,524	17.8%
Spanish	98,066	47.7%
Speak English less than "very well"	32,624	15.9%
Other Indo-European languages	1,328	0.6%
Speak English less than "very well"	324	0.2%
Asian and Pacific Island languages	6,461	3.1%
Speak English less than "very well"	2,838	1.4%
Other languages	1,456	0.7%
Speak English less than "very well"	738	0.4%

Source: 2017-2021 ACS 5-Year Estimates



Map 3: Limited English Proficiency (HUD AFFH-T Mapping Tool)

E. Household Characteristics

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

Household Type and Size

The number of San Bernardino households increased by 1.76 percent between 2011 and 2021, from 60,614 to 61,680 households. As shown in Table 6, the majority of the City's households are families (75 percent). However, the number of households with children (under the age of 18) decreased by 5.67 percent between 2011 and 2021. Approximately 13 percent of households are female-headed single-parent households living with their own children. In 2011, the average household size in the City was 3.35 persons per household, and in 2021 it was 3.41. About 34 percent of San Bernardino households included at least one or more persons over the age of 60.

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Table 6: Household Type and Size			
	2011	2021	% Change
Total Households	60,614	61,680	1.76%
Family Households	44,742	46,224	3.31%
With own children under 18 yrs	25,803	23,944	(7.20%)
Married couple with family	25,486	25,872	1.51%
With own children under 18 yrs	14,447	12,952	(10.35%)
Female householder, no spouse present	13,842	13,831	(0.08%)
With own children under 18 yrs	8,377	7,989	(4.63%)
Nonfamily households	15,872	15,456	(2.62%)
Householder living alone	12,586	11,917	(5.32%)
Householder 65 years and over	4,539	4,405	(2.95%)
Households with individuals under 18 years	29,883	28,188	(5.67%)
Households with individuals over 60 years	16,911	20,786	22.91%
Average household size	3.35	3.41	1.79%
Average family size	3.9	3.91	0.26%

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Special Needs Populations

Certain special needs groups may have difficulty finding housing in the City and may require specialized services, assistance, and accommodation. Due to the challenges that accompany special needs, these individuals and households may be more likely to earn extremely low to low incomes. Special needs groups include seniors, people with disabilities (mental, physical, and/or developmental), veterans, persons with HIV/AIDS, single-parent households, large households, homeless persons, and persons who are at-risk of homelessness.

Senior Population

Senior citizens are defined as any person aged 65 or older. Seniors may have special housing needs primarily due to income, healthcare costs, and physical or mental disabilities, particularly those that tend to increase with age. As a result, seniors may face difficulty in finding housing and may become victims of housing discrimination or fraud.

According to the 2017-2021 ACS estimates and as reflected in Table 2 above, approximately 20,826 seniors resided in the City, representing 9.4 percent of the total population. The senior population is growing at a faster pace than the overall population. Between 2011 and 2021, the total number of seniors in San Bernardino increased by 24 percent while the City's total population between those two years increased by only 5 percent. Table 7, below, shows how the senior population has changed by age group, with the most substantial change, 1.6 percent, occurring in the 65 to 74 years old category.

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Table 7: Elderly Population		
	Percent of Population	
	2011	2021
65-74 years old	4.3%	5.9%
75-84 years old	2.6%	2.4%
85 and older	1.0%	1.1%

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Persons with Disabilities

Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make self-care difficult. Disabled persons frequently have special housing needs, often related to a potentially limited ability to earn enough income, a lack of accessible and affordable housing, and higher health costs associated with a disability. In addition, people with self-care and mobility limitations may require special housing design features such as wheelchair ramps, grab bars, special bathroom designs, wider doorway openings, and other features.

Disabled persons are often more vulnerable to housing discrimination. This discrimination can take on many forms, including, but not limited to, refusal to rent or sell or refusal to allow reasonable accommodation or modification to the unit. Reasonable accommodation refers to any change, exception, or adjustment that would allow a person with a disability to access, use, or enjoy housing. Examples of this would include allowing a service animal in a housing unit that does not allow pets or installing ramps for a tenant who uses a wheelchair.

Section 504 of the Rehabilitation Act of 1973 guarantees certain rights to people with disabilities. This legislation was one of the first U.S. Federal civil rights laws offering protections for people with disabilities. HUD's Section 504 regulation defines a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities. The term physical or mental impairment may include, but is not limited to, conditions such as visual or hearing impairment, mobility impairment, HIV infection, developmental disabilities, drug addiction, or mental illness.

According to 2017-2021 ACS data, 13.2 percent of San Bernardino residents reported a disability. Table 8, below, shows the different types of disabilities reported by residents, with the most prevalent being cognitive and ambulatory difficulties at seven percent of the total population for each. Six percent of the population also experiences independent living difficulty and may face housing discrimination or have trouble finding housing that fits their individual needs.

Table 8: Persons with Disabilities Profile		
	Number	Percent of Population
With a disability	**29,295**	**13%**
with a hearing difficulty	6,650	3%
with a vision difficulty	8,372	4%
with a cognitive difficulty	13,193	7%

with an ambulatory difficulty	13,640	7%
with a self-care difficulty	5,697	3%
with an independent living difficulty	9,954	6%

Source: 2017-2021 ACS 5-Year Estimates

Persons with HIV/AIDS

Individuals with HIV/AIDS are protected against housing discrimination under the Fair Housing Act of 1968 and section 504 of the Rehabilitation Act of 1973, which protects the rights of Americans living with disabilities. According to the Americans with Disabilities Act of 1990, a disability is defined as a physical or mental impairment that significantly limits the ability to perform major life activities. The 1998 Supreme Court case of Bragdon v. Abbott upheld that HIV/AIDS is a disability as outlined by the ADA, and that reproduction is a major life activity.

Persons with HIV/AIDS often face housing discrimination due to the stigma associated with their health status. The housing status of an HIV/AIDS patient is crucial to the quality of their care. Each year, HUD investigates complaints of alleged housing discrimination against individuals with disabilities, including HIV/AIDS. The Center for Disease Control (CDC) has historically stated that housing stability is a significant barrier to HIV care and that stable housing is closely linked to successful HIV-related health outcomes.

According to the 2022 California HIV Surveillance Report, the number of new HIV diagnoses across the state increased by 0.4 percent between 2018 and 2022. The number of newly diagnosed people in the County of San Bernardino was 278 in 2018 and 291 in 2022. In 2022, the County had a total of 5,466 people living with a diagnosed HIV infection, of which 67 percent were in care and 57.1 percent had virally suppressed HIV. The total number of people living with HIV in the County increased by 17 percent between 2018 and 2022.

Homeless Population

Homelessness is attributable to challenges resulting from the loss of employment, difficulty finding jobs, the need to develop or redevelop marketable skills, the cost of housing, chronic health problems, physical disabilities, mental health disabilities, drug and alcohol use disorders, and/or a host of other factors. Individuals or families who are homeless have a variety of special needs, including emergency shelter, transitional housing, interim and permanent supportive housing, mental health counseling, and job training.

The 2024 San Bernardino County Point in Time (PIT) Count documented 1,417 homeless individuals in the City of San Bernardino. Between 2019 and 2024, the City's unhoused population increased by 59 percent. Table 9 summarizes the information available for 2024 across the City and County.

Table 9: 2024 PIT Count Overview

Jurisdiction	Sheltered		Unsheltered	Total
	Sheltered	Transitional Housing		
City	337	103	977	1,417
County	844	338	3,055	4,237

Source: 2024 County of San Bernardino Point in Time Count

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Table 10 provides data on the issues experienced by homeless individuals in the City who were surveyed for the 2024 PITC. This data helps provide a better understanding of what types of services may be needed to better assist the population in becoming housed and to prevent homelessness from occurring in the first place. Approximately 45 percent of homeless people who were surveyed are experiencing chronic homelessness, indicating a severe hurdle with becoming housed or remaining housed.

Table 10: 2024 PIT Count Issues Experienced		
	#	% of pop. surveyed
Chronic Health Condition	84	17.50%
Chronically Homeless	216	44.90%
Developmental Homeless	30	6.20%
Foster Care (ever been)	60	12.50%
Homeless for First Time in 12 months	159	33.10%
HIV/AIDS	8	1.70%
Incarcerated During Last 12 Months	85	17.70%
Mental Health Disability or Disorder*	103	21.40%
Physical Disability*	98	20.40%
Substance Use Problem, Disability, or Disorder*	134	27.90%
Veteran	28	5.80%
Victims of Domestic Violence**	41	8.50%
**That seriously limits ability to live independently.*		
**Including experiencing homelessness due to fleeing domestic violence, dating violence, sexual assault, or stalking.*		

Source: 2024 County of San Bernardino Point in Time Count

In addition, the PITC also looks at demographic characteristics of the area's homeless population. Approximately 64 percent of the City's surveyed homeless population identifies as male, while nearly 30 percent are White, 26 percent are Black, African American, or African, and 34 percent are Hispanic or Latino. In terms of age, the majority of the City's unhoused population is aged from 35 to 64.

Table 11: PIT Count Demographics Summary		
	Number	Percent
Gender		
Woman (Girl if child)	168	34.90%
Man (Boy if child)	307	63.80%
Transgender	3	0.60%
Non-Binary	1	0.20%
Other Identity	2	0.40%
Total	**481**	**99.90%***
Race/Ethnicity		
American Indian, Alaska Native, or Indigenous	15	3.10%
Asian	6	1.30%

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Black, African American, or African	127	26.40%
Middle Eastern or North African	1	0.20%
Native Hawaiian or Pacific Islander	2	0.40%
White	142	29.50%
Multi-Racial/Other	25	5.20%
Hispanic or Latino	163	33.90%
Total	**481**	**100.00%**
Age		
18-24	14	2.90%
25-34	90	18.70%
35-44	142	29.50%
45-54	112	23.30%
55-64	100	20.80%
65+	23	4.80%
Total	**481**	**100.00%**
**Slight variance due to rounding to the nearest integer.*		

Source: 2024 County of San Bernardino Point in Time Count

Large Households

Large households are defined as households with five or more members. The size and composition of large households vary from family to family and home to home. Typically, these are households with multiple children or mixed-family arrangements, such as households with more than two generations or immediate families cohabiting.

Large households are considered a special needs group because of the limited availability of adequately sized, affordable housing units. To afford shelter in addition to food, clothing, and medical care, very low- and low-income large households may live in overcrowded conditions.

Table 12 compares the number of large households residing in the City in the years 2011 (13,119) and 2021 (14,070). There was relatively equal distribution between large renter households and large owner households, indicating a need for larger units for both renter and owner units.

Table 12: Large Households

	2011		2021	
	#	%	#	%
Total Occupied Housing Units	60,614	100.00%	61,680	100.00%
Owner Occupied	31,320	51.67%	30,121	48.83%
Renter Occupied	29,294	48.33%	31,559	51.17%
Owner & Renter Occupied				
5 persons	6,576	10.85%	7,508	12.17%
6 persons	3,783	6.24%	3,663	5.94%
7 or more persons	2,760	4.55%	2,899	4.70%

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Owner Occupied				
5 persons	3,314	10.58%	4,004	13.29%
6 persons	2,050	6.55%	1,755	5.83%
7 or more persons	1,407	4.49%	1,590	5.28%
Renter Occupied				
5 persons	3,262	11.14%	3,504	11.10%
6 persons	1,733	5.92%	1,908	6.05%
7 or more persons	1,353	4.62%	1,309	4.15%

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Families with Children

Families with children are protected from discrimination under the Fair Housing Act. These households may face discrimination or differential treatment in the housing market, most commonly from landlords who associate the presence of children with potential property damage or noise disturbances. Discrimination may also include charging large households a higher rent or security deposit, limiting the number of children in a complex, limiting what floors or units a family can occupy, limiting the time children can play outdoors, or choosing not to rent to families with children.

According to 2017-2021 ACS data, there were 61,680 total households in the City, of which 46,224 were families. Within the count of families, 23,944 families had children under 18 years old (or 39 percent of the total household population). The County of San Bernardino trends similarly, with 35 percent of the total household population accounting for families with children.

Table 13: Families with Children

	Total Households	Total Families	Families with Children	
			Number	%
City	61,680	46,224	23,944	39%
County	651,743	497,496	226,581	35%

Source: 2017-2021 ACS 5-Year Estimates

Single-Parent Households

Single-parent families, particularly female-headed families, often require special consideration and assistance due to one-person household versus a two-person household. There is a greater need for affordable housing and accessible daycare, healthcare, and other supportive services. Because of more limited resources, relatively lower income, and higher burden of living expenses, female-headed families have more limited opportunities to find affordable, decent, and safe housing. Female-headed families may also be discriminated against in the rental housing market because some landlords are concerned about the ability of these households to make regular rent payments. Consequently, landlords may require more stringent credit checks for women, of fair housing laws.

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Table 14: Single Parent Households		
	City	County
Total Households	60,614	651,743
# of Single Parent Households	10,992	75,690
% of Single Parent Households	18.13%	11.61%

Source: 2017-2021 ACS 5-Year Households

According to 2017-2021 ACS data, the City comprises 60,614 households, with 10,992 classified as single-parent households, representing approximately 18 percent of all households. Among these, there are 6,521 male-headed households with no spouse present (10.8 percent of all households) and 13,831 female-headed households with no spouse present (22.8 percent of all households). Of these demographics, 3,003 male householders (no spouse present) live with their children under the age of 18 (27.3 percent of single-parent households), while 7,989 female householders (no spouse present) live with their children under the age of 18 (72.7 percent of single-parent households).

To address a community's fair housing issues, the existing housing market must be analyzed to distinguish local and current conditions. The following sections provide an overview of the local and regional housing market characteristics.

F. Income Profile

Household income does not directly affect fair housing options. However, perceptions about income to household type and size, race/ethnicity, and other characteristics can result in biases that trigger fair housing concerns. The workforce profile included here is important to help establish data-driven goals and priorities for workforce development to increase access to jobs and economic mobility.

Median Income

In 2021, the City of San Bernardino's median household income (MHI) was $55,372, while the County's MHI was $70,287. MHI in the City was approximately 27 percent less than in the County.

Income by Race and Ethnicity

Black or African American households have the lowest median household income at $36,762 as compared to the City's median income of $55,372.

Table 15 shows the breakdown of MHI by race and ethnicity in 2011 and 2021. While Native Hawaiians and other Pacific Islanders have the highest median household income of any group, this population group accounts for less than 1 percent of the City's total population. Asian households have the second highest MHI and account for approximately 4 percent of the City's total population. White households have the third highest MHI of any racial group, at $58,579, a 33 percent increase from 2011. The City's Hispanic and Latino population, who can be of any racial group, have an MHI of $58,062, a 54 percent increase from 2011. The only racial group that falls below the MHI in the City is Black or African American households, which have an MHI of $36,762.

Table 15: Median Household Income by Race			
	2011	2021	Percent Change
	Median Income	Median Income	
White	$44,081	$58,579	33%
Black or African American	$31,425	$36,762	17%
American Indian or Alaska Native	$48,672	$58,229	20%
Asian	$41,627	$60,990	47%
Native Hawaiian or Other Pacific Islander	$76,418	$80,192	5%
Some other race	$37,194	$59,296	59%
Two or more races	$43,537	$54,270	25%
Hispanic or Latino origin (of any race)	$37,772	$58,062	54%
Median HH Income (City of San Bernardino)	**$40,161**	**$55,372**	**37%**

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Household Income

Median household income in the City increased by almost 38 percent between 2011 and 2021, from $40,161 to $55,372. Table 16 provides a breakdown of extremely low, very low-, and low-income households by tenure. These income classifications constitute HUD's low- to moderate-income (LMI) category, as further explained in the following section. As reflected in Table 16, LMI homeowners have higher incomes than LMI renters. For example, while 23 percent of LMI homeowners are extremely low-income (0-30% AMI), 77 percent of LMI renters are extremely low-income (0-30% AMI). Overall, there are 11,250 LMI owners and 33,820 LMI renters in the City.

Table 16: Household Income					
	Owner		Renter		Total
	#	%	#	%	#
Extremely Low Income (0%-30%)	2,500	23%	8,310	77%	10,810
Very Low Income (30%-50%)	3,395	32%	7,135	68%	10,530
Low Income (50%-80%)	5,355	43%	7,125	57%	12,480

Source: 2017-2021 CHAS

Table 17: Median Household Income		
2011	2021	% Change
$40,161	$55,372	37.88%

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Low to Moderate Income Target Areas

As established by HUD, low-moderate income (LMI) households refer to those whose incomes do not exceed 80 percent of the area median income (AMI). A low-income area is defined as a census tract or block group comprising at least 51 percent of households in the low- and moderate-income ranges. LMI is set by HUD and adjusted for the total number of people in the household. There are three income levels for LMI households:

- Extremely low income: Households earning 30% or less than the AMI
- Very low income: Households earning between 30% to 50% of the AMI
- Low income: Households earning between 50% to 80% of the AMI

Table 18: HUD Median Income Limits for City of San Bernardino, 2024									
Median Family Income	FY Income Limit Category	Number of Persons in Household							
		1 Person	2 Person	3 Person	**4 Person**	5 Person	6 Person	7 Person	8 Person
$97,500	Extremely Low (0-30%)	$21,550	$24,600	$27,700	**$31,200**	$36,580	$41,960	$47,340	$52,720
	Very Low (30-50%)	$35,900	$41,000	$46,100	**$51,250**	$55,350	$59,450	$63,550	$67,650
	Low (50-80%)	$57,400	$65,600	$73,800	**$82,000**	$88,600	$95,150	$101,650	$108,250

Source: HUD 2024 Income Limits, County of San Bernardino, CA

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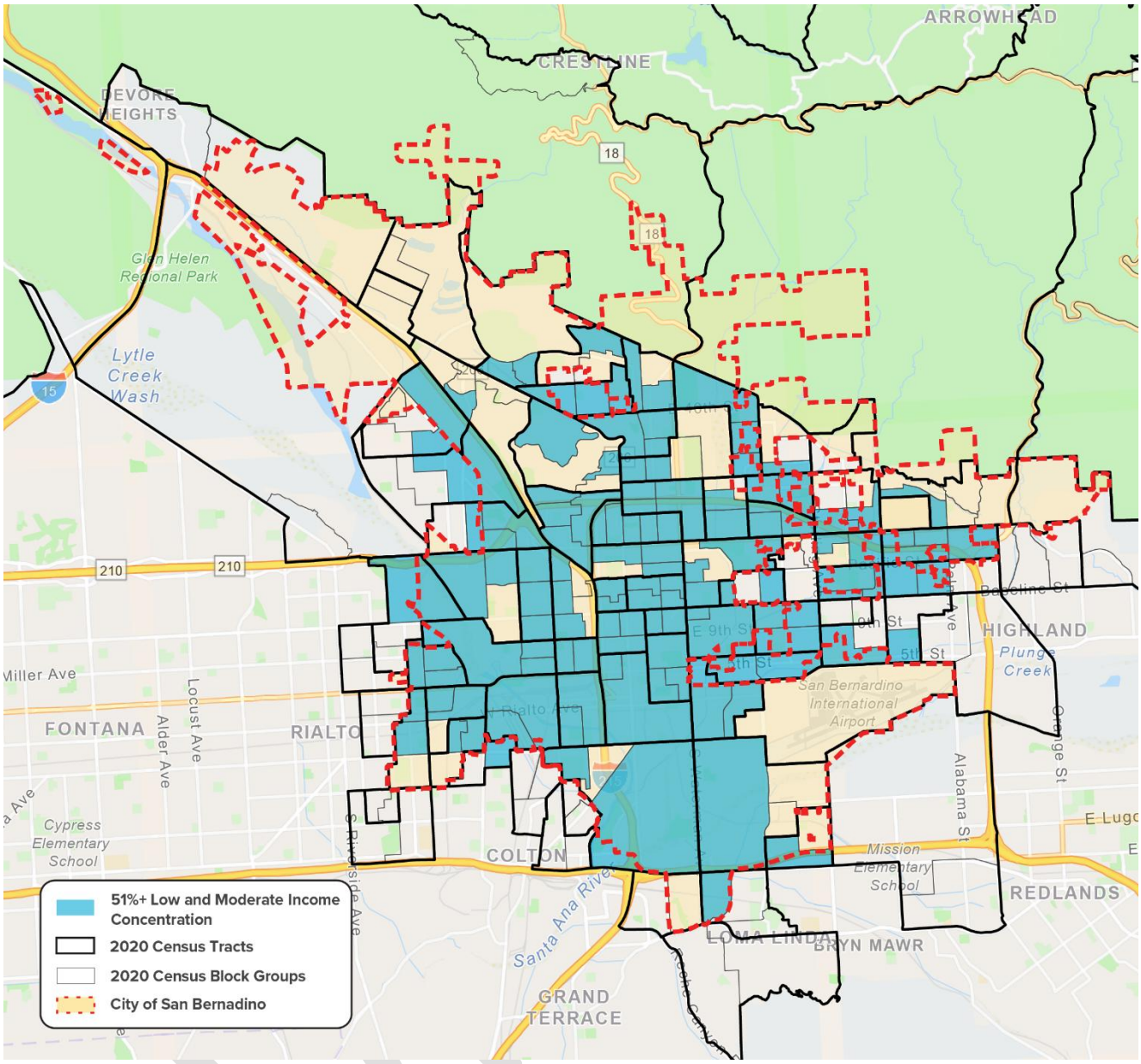

Map 4: LMI Areas, City of San Bernardino

G. Housing Profile

This section provides an overview of the City's housing stock and market, including the conditions and value of current housing units, occupancy trends, and residents' housing problems. Analyzing these conditions allows for informed, data-driven decisions regarding implementing fair housing practices.

Housing Growth

Most housing development across the City occurred in the mid-to-late 20th century, as reflected in Figure 1. The increase in the City's housing stock has been minimal in the last two decades. Between 2000 and 2021, there was a 3.6 percent increase in housing units. Most of this change occurred between 2000 and 2011, while between 2011 and 2021, the City experienced a loss in housing stock of 1.1 percent. A lack of housing unit growth when there is a need leads to increased costs, making access to affordable housing more challenging for LMI households.

Table 19: Housing Unit Growth					
2000	2011	Change from 2000 - 2011	2021	Change from 2011-2021	Change from 2000-2021
63,535	66,575	4.78%	65,842	(1.10%)	3.63%

Source: 2000 U.S. Census, 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Housing Unit Type

The City of San Bernardino's housing stock comprises single-family homes, which are housing units that house one household or family. Single-family zoning is largely popularized across the country, while multifamily housing, such as apartment units and condos, tends to face more significant challenges with zoning. Table 20 below shows a distinction between detached and attached single-family homes, with detached being stand-alone and attached sharing an exterior wall with another unit, such as a townhome. According to 2021 ACS data, approximately 63 percent of housing units in the City are single-family homes. The vast majority, 95 percent, are detached homes.

Table 20: Housing Characteristics		
	2011	2021
Single-Family Units		
1-unit, detached	40,659	39,892
1-unit, attached	1,942	1,907
Multifamily Units		
2 units	1,559	949
3 to 4 units	4,016	3,803
5 to 9 units	3,520	4,038
10 to 19 units	4,330	2,964
20 or more units	6,067	7,990
Other Units		
Mobile home	4,370	4,292
Boat, RV, van, etc.	112	7
Occupied units	60,614	61,680
Vacant Units	5,961	4,162
Persons per Household	3.35	3.4
Total housing units	**66,575**	**65,842**

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

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Housing Unit Conditions

Age is an indication of the quality of the housing stock. Housing over 30 years old will likely require rehabilitation, such as plumbing, roof, or foundation repairs. In addition, older homes tend to be less energy efficient, which increases utility costs.

Figure 1 displays the age of San Bernardino's housing stock according to the 2017-2021 ACS estimates. Of all housing units in San Bernardino, less than 10 percent are under 25 years old, built in 2000 or later. In contrast, 66 percent are more than 46 years old.

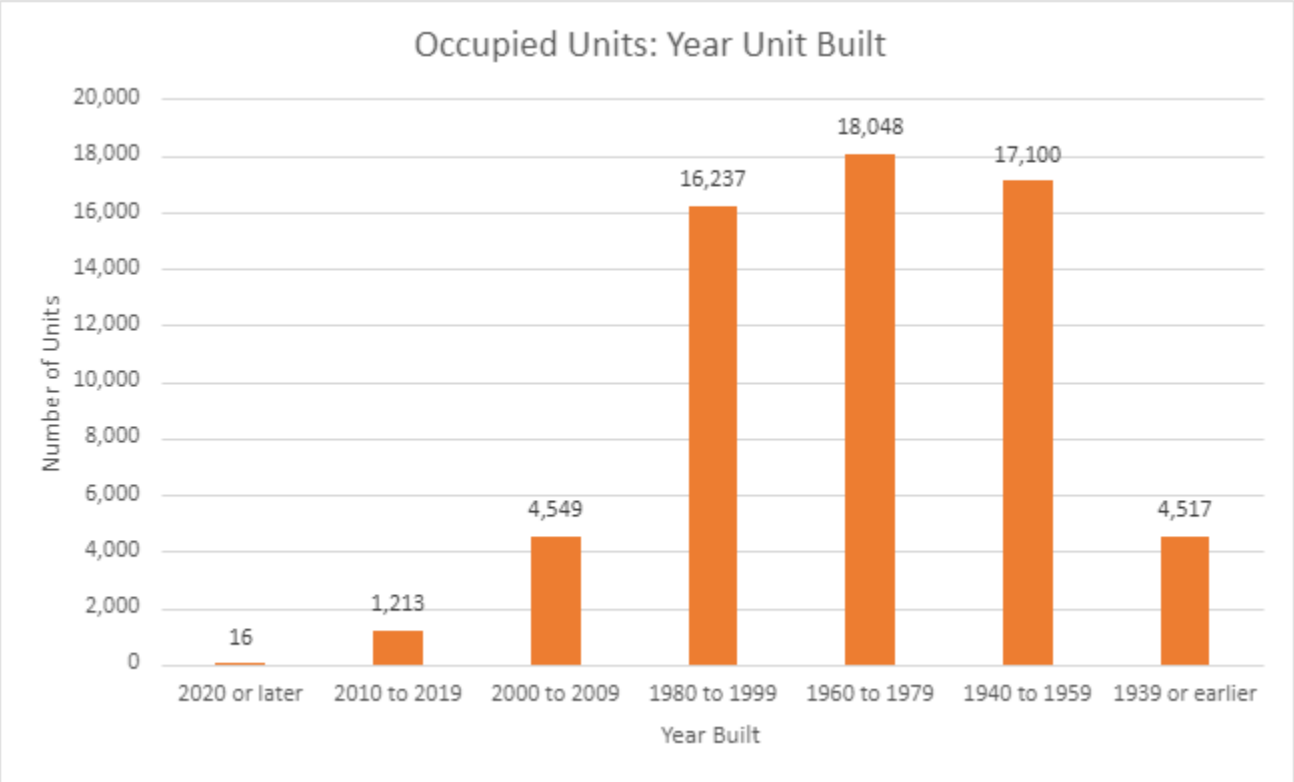

Figure 1: Housing Stock by Year Built (2017-2021 ACS 5-Year Estimates)

The City's data differs from the County's, whereby the County experienced a higher production of housing units from 1970 onwards. The City, on the other hand, built more housing units from 1950 to 1989. The County saw another increase between 2000 and 2009, while housing production in the City continued to slow down.

Table 21: Year Unit Built- City v. County

Year Unit Built	City		County	
	Number	%	Number	%
2020 or later	16	0.02%	1,332	0.18%
2010 to 2019	1278	1.99%	35,596	4.93%
2000 to 2009	4,818	7.51%	103,351	14.33%
1990 to 1999	5,673	8.84%	93,666	12.98%
1980 to 1989	11,588	18.06%	162,358	22.51%
1970 to 1979	10,355	16.14%	122,915	17.04%

1960 to 1969	9,108	14.19%	74,350	10.31%
1950 to 1959	12,387	19.30%	81,094	11.24%
1940 to 1949	5,690	8.87%	28,051	3.89%
1939 or earlier	4,929	7.68%	25,961	3.60%
Total	**65,842**		**728,674**	

Source: 2017-2021 ACS 5-Year Estimates

Vacancy Rate

Residential mobility is influenced by tenure. Ownership housing is associated with a much lower turnover rate than rental housing. Tenure preferences are primarily related to household income, composition, and age of the householder.

Table 22 demonstrates the City's vacancy rates in 2011 and 2021 based on ACS data. A healthy vacancy rate is associated with choice and mobility. Generally, a healthy vacancy rate for owner-occupied housing is 2 to 3 percent vacancy. For rental units, a healthy rate is 5 to 6 percent vacancy.

In 2011, the vacancy rate for owner-occupied housing was 0.8 percent above range, at 3.8 percent, and in 2021 it was lower by 1.4 percent, at 1.6 percent. In 2011, the renter-occupied rate was above the healthy range by 1.3 percent, at 7.3 percent. By 2021, the rental vacancy was below the healthy range by 2.7 percent.

Table 22: Vacant Units and Vacancy Rates

Tenure	2011	2021
Homeowner Vacancy Rate	3.8%	1.6%
Renter Vacancy Rate	7.3%	2.3%

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Lead-Based Paint Hazard

Lead-based paints (LBP) were popularized in the early twentieth century for their durability, appearance, and shorter drying time. Homes, public buildings, and household items such as children's toys and cribs were coated with LBP. According to the U.S. Environmental Protection Agency (EPA):

> "This paint could be on window frames, walls, the outside of your house, or other surfaces. Tiny pieces of peeling or chipping paint are dangerous if eaten. Lead-based paint in good condition is not usually a problem except in places where painted surfaces rub against each other and create dust. (For example, when you open a window, the painted surfaces rub against each other)."

Ingesting chipped paint or paint dust is harmful to both adults and children. For example, toddlers routinely put their hands and sometimes feet in their mouths and can accidentally ingest LBP. Objects may be coated with LBP dust as well and may be placed in the mouths of young children.

The Lead-Based Paint Poisoning Prevention Act of 1971 banned LBP for use in public housing. However, LBP continued to be used in commercial and private residential developments until 1978 when the federal government passed more comprehensive legislation to ban its use in residential housing.

According to ACS data, approximately 66 percent of the City's current housing stock was built prior to 1978.

According to the American Healthy Homes Survey conducted from June 2005 through March 2006 and published in 2011 by HUD's Office of Healthy Homes and Lead Hazard Control, 37.1 million homes in the U.S. have LBP somewhere in the unit. Of those 37.1 million or 35 percent of the country's housing stock, approximately 23.2 million or 22 percent of all homes contain one or more LBP hazards.

The County of San Bernardino operates a Childhood Lead Poisoning Prevention Program (CLPPP), providing community education to increase awareness on the potential risks and dangers of lead exposure, home environmental screenings, public health nurse care management, and monitors child health providers to ensure lead testing occurs for high-risk children.

Housing Tenure

Housing tenure refers to whether a household owns or rents the housing unit that it occupies. The U.S. Census specifically distinguishes between two categories: owner-occupied and renter occupied. Owner-occupied housing units are owned by the occupants, while renter-occupied housing units are rented from another party, typically known as a landlord.

Whether a household owns or rents their unit depends on a variety of factors, including age of the head of the householder, household size, and household income, among others. To properly accommodate the housing needs of all its residents, it is important that a City has both rental and ownership units in its housing stock. When thinking about the differences in types of stock, while existing homeowners may experience more issues with the personal responsibilities associated with maintaining property, renters may face more violations of fair housing laws.

According to 2021 ACS data, housing units in San Bernardino are divided almost equally between owner- and renter-occupied, with only a 2.3 percent difference. The majority of residents, by a slim margin, are renters rather than homeowners.

Table 23: Household Tenure – Owner v. Renter

	Number	Percent
Owner-Occupied	30,121	48.83%
Renter-Occupied	31,559	51.17%
Total Households	**61,680**	**100%**

Source: 2017-2021 ACS 5-Year Estimates

As shown in Table 24 below, 4,162 housing units in the City are vacant, a 30 percent decrease from 2011. In addition, during 2011 there were more owner-occupied households than renter-occupied households, by approximately three percent. While the difference between the number of San Bernardino renters and owners has fluctuated throughout the years, it has remained divided very closely.

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Table 24: Housing Unit Tenure Comparison				
Tenure Type	2011		2021	
	# of Units	Percent	# of Units	Percent
Owner-Occupied	31,320	47.04%	30,121	45.75%
Renter-Occupied	29,294	44.00%	31,559	47.93%
Vacant	5,961	8.95%	4,162	6.32%
Total Housing Units	**66,575**	-	**65,842**	-

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

The City's housing stock is mostly comprised of two-to-three-bedroom units, making up approximately 66 percent of all occupied housing units. According to ACS data, San Bernardino homeowners are typically more likely to live in larger units (four or more bedrooms) as well, with 27 percent of owners and only seven percent of renters occupying large units. While this disparity could indicate a lack of need for large rental units, it may also indicate a lack of availability, resulting in overcrowding. As shown in Table 36, 18 percent of renters and nine percent of owners in the City are experiencing overcrowding issues.

Table 25: Unit Size by Tenure				
Rooms	Owners		Renters	
	Number	%	Number	%
No bedroom	290	0.96%	1,248	3.95%
1 bedroom	385	1.28%	8,217	26.04%
2 or 3 bedrooms	21,220	70.45%	19,796	62.73%
4 or more bedrooms	8,226	27.31%	2,298	7.28%
Total	**30,121**	-	**31,559**	-

Source: 2017-2021 ACS 5-Year Estimates

Housing Costs and Affordability

The cost of housing relative to income is one of the most important factors in evaluating a community's housing market. If housing costs are relatively high in comparison to household income, housing cost burdens and overcrowding tends to occur. However, housing affordability alone is not necessarily a fair housing issue. Such concern arises when housing affordability is coupled with factors protected under fair housing laws, such as household type, composition, and race/ethnicity. Table 26, below, displays the maximum affordable rental and mortgage costs based on HUD income limits for the County of San Bernardino, while Table 27 shows actual housing costs expended by City residents.

Table 26: Affordability Rent and Mortgage Combined				
	1 Person	**2 Persons**	**3 Persons**	**4 Persons**
Extremely Low (0%-30%)				
Annual Income	$21,550	$24,600	$27,700	$31,200
Monthly Income	$1,795.83	$2,050	$2,308.33	$2,600
Affordable Purchase Price*	$58,146	$69,948	$81,944	$95,487
Maximum Affordable Rent**	$538.75	$615	$692.50	$780
Very Low (30%-50%)				

Annual Income	$35,900	$41,000	$46,100	$51,250
Monthly Income	$2,991.67	$3,416.67	$3,841.67	$4,270.83
Affordable Purchase Price*	$108,540	$127,312	$144,009	$162,748
Maximum Affordable Rent**	$897.50	$1,025	$1,152.50	$1,281.25
Low (50%-80%)				
Annual Income	$57,400	$65,600	$73,800	$82,000
Monthly Income	$4,783.33	$5,466.67	$6,150	$6,833.33
Affordable Purchase Price*	$185,126	$211,333	$240,666	$269,999
Maximum Affordable Rent**	$1,435	$1,640	$1,845	$2,050
Moderate (80%-120%)				
Annual Income	$81,900	$93,600	$105,300	$117,000
Monthly Income	$6,825	$7,800	$8,775	$9,750
Affordable Purchase Price	$269,642	$311,495	$353,349	$386,748
Maximum Affordable Rent**	$2,047.50	$2,340	$2,632.50	$2,925

*Affordable Purchase Price assumes a down payment of $20,000, an approved credit score, $250 monthly debt payments, a 1.32% property tax rate, a $945 annual home insurance payment, and a 30-year mortgage. Pricing from Affordability Calculator - How Much House Can I Afford? | Zillow.

**Maximum Affordable Rent refers to a monthly payment that is 30% of monthly income. Any amount over this number is cost-burdened and any amount less than this number is affordable.

Source: 2024 HUD Income Limits for San Bernardino County

Table 27: Changes in Value, Rent, and Income

	2011	2021	% Change
Median Housing Value	$202,400	$293,000	44.76%
Median Contract Rent	$823	$1,058	28.55%
Median Household Income	$40,161	$55,372	37.88%

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Homeowner Costs

Table 28, below, compares median home purchase prices in the City between 2019 and 2021. The City's housing market experienced an average median sales price increase of almost 46 percent. The median sales price of single-family homes increased by 47 percent, while the median sales price of condominiums (condos) increased by approximately 29 percent. The COVID-19 pandemic resulted in increased housing costs across much of the nation and state.

Table 28: Housing Sale Prices (2019 and 2021)

	2019		2021		% Change	
	Units Sold	Median Sales Price (Dec)	Units Sold	Median Sales Price (Dec)	Units Sold	Median Sales Price (Dec)
SF Homes	110	$312,500	146	$460,000	32.73%	47.20%
Condos/Co-ops	14	$164,000	14	$212,000	0.00%	29.27%
Total/Average	128	$300,000	170	$437,500	32.81%	45.83%

Source: Redfin Market Trends for San Bernardino, CA: San Bernardino Housing Market: House Prices & Trends | Redfin

Renter Costs

Overall, the average rental price in the City of San Bernardino is more affordable than that of the State of California. The affordability gap for a three-bedroom unit is $1,055 compared to the State average,

and $852 for a two-bedroom unit. According to Zillow Rental Manager, rent in San Bernardino is 78 percent lower than overall in the State of California while median rent is $50 less than the national average.

Table 29: Average Rental Housing Prices					
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4+ Bedroom
City	$1,400	$1,500	$1,943	$2,595	$2,167
State	$1,800	$2,150	$2,795	$3,650	$9,766

Source: Zillow Rental Manager: Rent Comparison Tool & Rental Market Trends Data | Zillow Rental Manager

An alternative approach to analyzing prices is to examine HUD Fair Market Rents (FMRs), which are set at the 40th percentile of available housing in a community for rent and utilities. As shown in Table 30, FMRs for San Bernardino County increased for all unit sizes from 2020 to 2022 to 2024.

Table 30: San Bernardino County Fair Market Rents by Unit Bedrooms					
Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2020 FMR	$875	$1,030	$1,289	$1,789	$2,216
FY 2022 FMR	$1,062	$1,202	$1,509	$2,065	$2,542
FY 2024 FMR	$1,517	$1,611	$2,010	$2,707	$3,304

Source: HUD FY 2020, 2022 and 2024 Fair Market Rent Documentation System, San Bernardino County, CA

Table 31 below shows available, affordable rental housing units throughout the City in 2011 and 2021, respectively. In 2011, approximately 60 percent of housing units for rent were priced at $999 or less. In 2021, that number decreased to 30 percent of total units.

Table 31: Affordable Rental Housing Units in City				
	2011		2021	
	Number	Percent	Number	Percent
Less than $500	2,819	9.93%	1,769	5.75%
$500-$999	14,177	49.96%	7,536	24.51%
$1,000 or more	11,379	40.10%	21,439	69.73%
Total	**28,375**	**100%**	**30,744**	**100%**

Source: 2007-2011 ACS 5-Year Estimates, 2017-2021 ACS 5-Year Estimates

Housing Problems

Cost Burden

Households allocating 30 percent or more of their income toward housing are considered cost burdened. A cost burden ranging from 30 to 50 percent is considered moderate, while housing expenses exceeding 50 percent of income indicate a severe cost burden. This issue is particularly significant as excessive housing costs reduce the financial resources available for essential needs such as food, daily living expenses, and emergencies.

Upper-income households generally can spend a larger proportion of their income on housing. Therefore, estimates of the housing cost burden tend to focus on low—and moderate-income households. As Table 32 shows, the City's low-income households are primarily renters.

Table 32: Income Distribution Overview					
	Owner		Rental		Total
	#	%	#	%	
Extremely Low Income (0%-30%)	2,500	23.12%	8,310	76.68%	10,810
Very Low Income (30%-50%)	3,395	32.24%	7,135	67.75%	10,530
Low Income (50%-80%)	5,355	41.70%	7,125	57.09%	12,480

Source: 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)

As shown in Table 33 below, renters in the City faced far higher rates of cost burden as compared to owners. The majority of cost-burdened are expending between 30 to 50 percent of their income on housing, however, 2,715 owner households are severely cost-burdened as well, expending 50 percent or more of their income on housing. As shown in Figure 2, a further breakdown of the income of residents experiencing cost burden shows that severe cost burden is most prevalent for the City's extremely low-income residents.

Table 33: Housing Cost Burden Overview					
Cost Burden Factor	Owner		Renter		Total
	#	%	#	%	
Cost Burden <=30%	21,895	62.08%	13,375	37.92%	35,270
Cost Burden >30% to <=50%	5,370	39.33%	8,285	60.67%	13,655
Cost Burden > 50%	2,715	22.25%	9,485	77.75%	12,200

Source: 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)

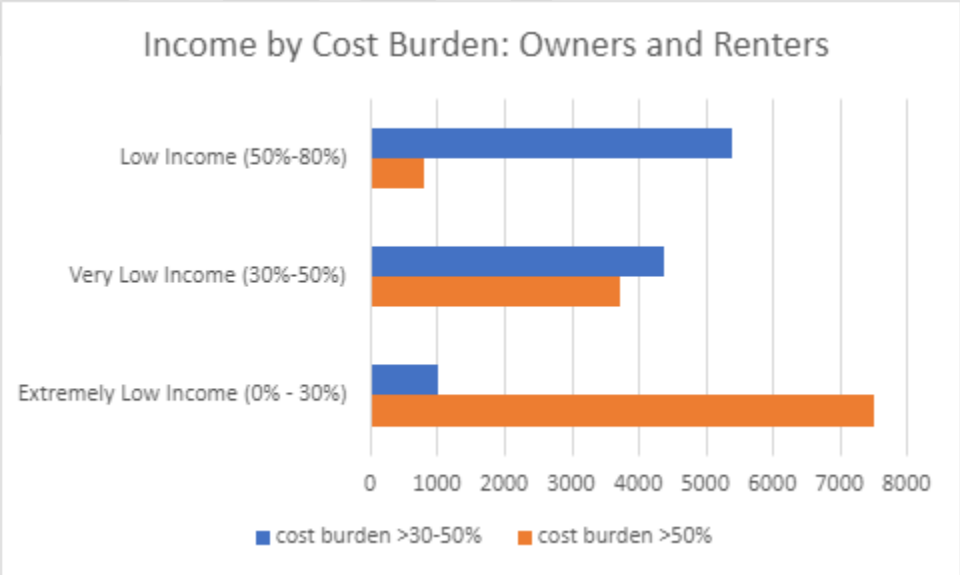

Figure 2: Income by Cost Burden: Owners and Renters (2017-2021 CHAS)

Examining the differences between LMI owners experiencing cost burden and LMI renters experiencing cost burden can provide a better picture of which groups may be experiencing more cost

burden than others. Tables 34 and 35 show a cost burden breakdown by tenure and income. 52 percent of LMI homeowners in the City are experiencing some level of cost burden. Severe cost burden (>50%) for homeowners is more concentrated in very- and extremely low-income households, totaling 910 and 1,160 households, respectively. In all, 19 percent of all homeowner households in the City are experiencing cost burden to some degree.

Table 34: Income by Cost Burden - OWNERS					
Cost Burden Factor	Cost Burden > 30-50%		Cost Burden > 50%		Total
	#	%	#	%	
Extremely Low Income (0% - 30%)	395	25.40%	1,160	74.60%	1,555
Very Low Income (30%-50%)	1,005	52.48%	910	47.52%	1,915
Low Income (50%-80%)	1,860	77.50%	540	22.50%	2,400
All LMI Owner Households					
Total Households	11,250		**% Cost Burdened**	52.17%	

Source: 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)

By comparison, 53 percent of all renter households in the City are experiencing cost burden to some degree. Of all LMI renter households, 75 percent are cost burdened. Most severely cost-burdened (>50%) renters are extremely low-income (0-30% AMI), totaling 6,365 households.

Table 35: Income by Cost Burden - RENTERS					
Cost Burden Factor	Cost Burden > 30-50%		Cost Burden > 50%		Total
	#	%	#	%	
Extremely Low Income (0% - 30%)	610	8.75%	6,365	91.25%	6,975
Very Low Income (30%-50%)	3,375	54.57%	2,810	45.43%	6,185
Low Income (50%-80%)	3,535	92.66%	280	7.34%	3,815
All LMI Renter Households					
Total Households	22,570		**% Cost Burdened**	75.21%	

Source: 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)

Overcrowding

Overcrowding occurs when a housing unit has more than one person per room. Severe overcrowding is defined as more than 1.5 persons per room. This analysis of persons per room includes bedrooms, living rooms, and dining rooms but excludes bathrooms, porches, foyers, halls, or half-rooms. Ideally, each individual household member would have their own room, though small children and married couples are the exception. At times, overcrowding may occur due to a lack of affordable units that fit a family's size or affordability issues, causing more than two generations from one family to live together. Research from the National Institute of Health shows that overcrowding and a lack of quiet space is also associated with poor school performance in children. Additional research from HUD has corroborated this finding.

Table 36 below shows that approximately nine percent of owner-occupied housing units and 18 percent of renter-occupied units in San Bernardino are considered overcrowded or severely overcrowded. Most overcrowding is moderate rather than severe, with 1.01 to 1.50 occupants per room.

Table 36: Overcrowding		
	Household Tenure	
	Owner-Occupied	Renter-Occupied
Occupied Units	30,121	31,559
Overcrowded*	2,148	3,775
Severely Overcrowded**	537	1,956
Percent Overcrowded	8.91%	18.16%
*Overcrowding is defined as 1.01 to 1.50 occupants per room. **Severely overcrowded is defined as 1.51 or more occupants per room.		

Source: 2017-2021 ACS 5-Year Estimates

Substandard Housing

According to HUD, substandard housing refers to a dwelling unit that is either dilapidated or unsafe, thus endangering the health and safety of the occupant, or that does not have adequate plumbing or heating facilities.

There are four types of substandard housing problems:

1. Households lacking complete kitchen facilities.
2. Households lacking complete plumbing facilities.
3. Overcrowded households (more than one person per room).
4. Cost burdened households (spending 30 percent of household income or more on housing cost).

According to 2017-2021 CHAS data, 19,630 renter households earning between 0 and 100 percent AMI experienced substandard housing through at least one of four housing problems, while 7,755 owner households did. Overall, significantly more renter households experience substandard housing issues than households who own the unit they reside in.

Table 37: Housing Problems Overview	
	Substandard Housing:
	At Least 1 of 4 Housing Problems
Renter Households	
0-30% AMI	7,150
>30-50% AMI	6,435
>50-80% AMI	5,030
>80-100% AMI	1,015
Total Renter Households	19,630
Owner Households	

0-30% AMI	1,600
>30-50% AMI	2,180
>50-80% AMI	2,780
>80-100% AMI	1,195
Total Owner Households	7,755
Renter and Owner Households	
0-30% AMI	8,750
>30-50% AMI	8,615
>50-80% AMI	7,810
>80-100% AMI	2,210
Total Renter and Owner Households	27,385

Source: 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)

Housing Vouchers

The City of San Bernardino works with the County of San Bernardino Housing Authority (HACSB) to administer Housing Choice Vouchers (HCVs), also known as Section 8, along with a myriad of other housing voucher types. As shown in Table 38, there are currently 112,846 County residents on the waiting list for an HCV and 2,019 total HCVs in use in the City. Most HCV holders, nearly 75 percent, are extremely low-income (0-30% AMI).

The HACSB administers additional housing vouchers currently in use in the City, including Family Unification (30), VASH (123), Emergency (139), HOPWA (33), Mainstream (67), and Continuum of Care vouchers (85).

Table 38: Housing Choice Vouchers

	#
Number of Families on Waiting List (County)	112,846
Total HCVs (City)	2,019
Income	
Extremely Low Income (0-30% AMI)	1,505
Very Low Income (31-50% AMI)	372
Low Income (51-80% AMI)	129
Types of Families	
Families with Children	833
Elderly Families	716
Families with Disabilities	851
Race/Ethnicity	
White	796
Black or African American	1,056
Asian	74
American Indian/Alaska Native	40
Hispanic or Latino	690
Native Hawaiian or Other Pacific Islander	12

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Other	41

Source: Housing Authority of the County of San Bernardino

Public Housing

The Housing Authority of the County of San Bernardino (HACSB) serves the city. HACSB has one public housing site, a single-family unit in Apple Valley. HACSB converted a 98-unit public housing site in Upland into a project-based voucher site. There are no public housing units in the City of San Bernardino.

Assisted Rental Housing

The City of San Bernardino has a significant amount of housing stock that receives public subsidies in return for long-term covenants guaranteeing the affordability of units. As shown in Table 39 below, the City currently has 3,804 affordable units receiving public subsidies, with 707 at risk of expiring. 38 percent of these units are limited to senior residents.

Table 39: Assisted Rental Housing Projects

Development Name	Target Residents	Project Financing	Total Units	Affordable Units	Earliest Expiration	At Risk Status
Sterling Village	Large Family	LIHTC	80	79	2036	Not At-Risk
Magnolia at Highland	Senior	LIHTC	80	79	2041	Not At-Risk
Lugo Apartments	Senior	LIHTC	119	118	2044	Not At-Risk
Vintage at Kendall	Senior	LIHTC	178	176	2043	Not At-Risk
Arrowhead Vista	Senior	LIHTC	40	39	2069	Not At-Risk
New Zion Manor	Family	LIHTC	125	125	2071	Not At-Risk
Beautiful Light Inn	Seniors	LIHTC	100	99	2072	Not At-Risk
Pioneer Park Plaza	All Ages	LIHTC	161	159	2073	Not At-Risk
Foothill Villas	Large Family	LIHTC	239	237	2075	Not At-Risk
Baseline Coop	Senior	202/811	75	74	Permanent	Not At-Risk
St. Bernardine Plaza	Senior	202/811	150	148	2037	Not At Risk
TELACU Monte Vista	Senior	202/811	75	74	2057	Not At-Risk
TELACU San Bern. V	Senior	202/811	75	74	2065	Not At-Risk
TELACU Buena Vista	Senior	202/811	75	74	2058	Not At-Risk
TELACU Sierra Vista	Senior	202/811	75	74	2057	Not At-Risk
TELACU La Amistad	Senior	202/811	89	89	2064	Not At-Risk
TELACU Hacienda	Senior	202/811	75	74	2064	Not At-Risk
AHEPA 3002	Senior	202/811	90	90	2047	Not At-Risk
Meadowbrook Park	Family	HAP/HOME	267	210	2033	Not At-Risk
Creekside Apartments	Family	Bonds	304	60	2049	Not At Risk
All Star Lodge	PSH	HOMEKEY	75	75	N/A	Not At Risk
Valencia Vista	Large Family	LIHTC	76	75	2068	Not At-Risk
Olive Meadow	Large Family	LIHTC	62	42	2073	Not At Risk
Crestview Terrace	Large Family	LIHTC	184	182	2076	Not At Risk
Tuscany/Silverwood	Family	Bond	328	66	2057	Not At Risk
Eastpointe Village	Family	RDA/NSP	52	52	2046	Not At-Risk

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Phoenix Apartments	Transitional	CalHFA	9	9	2033	Not At-Risk
Golden Apartments	PSH	HOME	39	38	2057	Not At-Risk
San Bernardino Senior	Senior	202/811	80	79	2042	Not At-Risk
Pacific Village	All Ages	HCD	--	--	2033	Not At-Risk
Village Green	All Ages	LIHTC/HAP	184	181	2042	Not At-Risk
Maplewood Home	Family	PBV	296	296	2026	Low Risk
Arrowhead Woods	Senior	PBV	51	51	2027	Low Risk
Kendall Drive Apts.	Family	PBV	37	6	2025	Low Risk
Kendall Park Apts.	Family	PBV	52	4	2025	Low Risk
Frazee	Family	HOME	14	13	2029	Low Risk
7 Arrows	Family	HOME	9	9	2029	Low Risk
Ramona Sr. Project	Senior	LIHTC/MRB	44	43	2024	High Risk
The Waterman	Large Family	LIHTC	128	127	2030	High Risk
Autumnwood/Millcre.	All Ages	LIHTC	160	158	2030	High Risk
Subtotal by Type			**Total Units**	**Affordable Units**	**At-Risk Units**	**Percent**
Senior Projects			1,542	1,448	94	6%
Family/All Ages Projects			2,514	2,155	613	24%
Permanent Supportive Housing			123	122	0	0%
Total (All Affordable Units)			**4,179**	**3,804**	**707**	**16%**

Source: 2021-2029 Housing Element, City of San Bernardino

H. Access to Opportunities

Public Transit

The City and surrounding County are served by the San Bernardino County Transportation Authority (SBCTA). SBCTA distributes many of the funds for public transit service in the area and oversees all transit services throughout the County. An extensive public transit system currently serves the County with a connection point at the San Bernardino Transit Center in the City. The SBCTA funds various bus operators in the area as well as rail and rideshare services. Current systems from the Transit Center include:

- Metrolink: Rail service to Los Angeles and Oceanside
- Arrow: Rail service to Redlands and San Bernardino
- Omnitrans: 12 bus routes to destinations throughout San Bernardino County and to Riverside County
- sbX: Omnitrans' high frequency express service to California State University San Bernardino and Loma Linda Medical Center
- Victor Valley Transit Authority (VVTS): Bus service to Victorville and Barstow
- Mountain Transit: Bus service to Crestline and Big Bear
- Sunline Transit: 10 commuter link services to Indio
- Riverside Transit Agency (RTA): Route 200 to Riverside and Disneyland
- Beaumont Transit: Route 120 to Beaumont and Cabazon

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Below is a general map of the connecting rail and bus services that operate from the San Bernardino Transit Center. For a more detailed map, please visit the SBCTA webpage or go to: https://www.gosbcta.com/wp-content/uploads/2023/09/regional-system-map-1.pdf

Map 5: San Bernardino Transit Center Regional Connections (SBCTA)

Employment

Employment status throughout the City is reflected in Table 40 below. The total number of employed residents was 90,210, or about 55 percent of the total population. The number of unemployed residents within the City's labor force was 8,313 or 5 percent. 40 percent of the City's population is not in the labor force. In comparison, 4.5 percent of the County's labor force was unemployed during the same period.

Table 40: Employment Status

	#	%
Employed	90,210	54.5%
Unemployed	8,313	5.0%

Not in labor force	66,486	40.2%

Source: 2017-2021 ACS 5-Year Estimates

Industry and Job Type

Table 41 summarizes the City's workforce by industry. In all, three industries comprise almost 48 percent of the total workforce. These include (1) educational services, health care and social assistance (18.92%), (2) transportation, warehousing, and utilities (14.66%), and (3) retail trade (14.08%). Employees in the information industry had the highest median earnings at $53,036 followed by construction at $43,895 and public administration closely following at $43,194. The lowest earning industry category is arts, entertainment, recreation, accommodation, and food services, with median earnings projected at $18,784.

Table 41: Workforce by Industry

	# of Total Industry	% Share	Median Earnings
Agriculture, forestry, fishing and hunting, and mining	547	0.63%	$27,179
Construction	8,495	9.78%	$43,895
Manufacturing	7,012	8.07%	$35,337
Wholesale trade	2,934	3.38%	$37,122
Retail trade	12,225	14.08%	$25,617
Transportation and warehousing, and utilities	12,726	14.66%	$32,136
Information	695	0.80%	$53,036
Finance and insurance, and real estate and rental and leasing	3,148	3.63%	$43,285
Professional, scientific, and management, and administrative and waste management services	8,610	9.92%	$30,742
Educational services, health care and social assistance	16,433	18.92%	$35,813
Arts, entertainment, recreation, and accommodation and food services	8,483	9.77%	$18,784
Other services, except public administration	4,043	4.66%	$25,542
Public administration	4,859	5.60%	$43,194
Total Employed Workforce	**90,210**	-	-

Source: 2017-2021 ACS 5-Year Estimates

Public Schools

The City of San Bernardino's public schools are served and operated by the San Bernardino City Unified School District (SBCUSD). SBCUSD services 73 schools, including 50 elementary schools, 11 middle schools, 10 high schools, a preschool, an adult education center, and a virtual academy. Schools are widespread and located in various areas throughout the City. In 2023, SBCUSD had a student enrollment of nearly 46,000, 90 percent of whom are socioeconomically disadvantaged.

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Chapter 4: Lending Practices

Lending practices are a contributing factor to fair housing choice. Loan applicants are at risk of discrimination, predatory lending, and unethical steering. Equity in money lending from financial service organizations is an important element of fair housing choice. Such organizations include credit unions, banks, credit card companies, and insurance companies. Lending is often required to access credit financing for mortgages, home equity, and home repair loans. Access to information regarding financial services is also a concern involving equality.

Gaps in financial services can make residents vulnerable to predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual's credit and the overall sustainability of homeownership and wealth accumulation. Information regarding lending from financial services is a concern that falls under the umbrella of the Fair Housing Act, as potential discrimination is possible.

This chapter reviews lending practices of financial institutions and financing allowed to all households but emphasizes lending to minority and low-income households. However, a jurisdiction's control over lending is limited due to federal laws and regulations.

A. Laws Governing Lending

Historically, financial institution lending practices, including credit market distortions and redlining, prevented minority groups from equal access to credit. These barriers contributed to segregated neighborhoods that persist in cities today.

Below are laws governing lending practices that aim to safeguard consumers, promote local economies, prevent housing discrimination, and address fair housing violations. Furthermore, banks receive ratings based on their performance, which the Federal Financial Institutions Examination Council (FFIEC) makes available to the public. This report includes the results of the city's top-rated banks.

Fair Housing Act

The passage of the Fair Housing Act (FHA) in 1968 sought to end discrimination against protected classes in all aspects of residential real estate related transactions, including mortgage lending. Under the FHA, a lender may not discriminate against a protected class in any aspect of mortgage lending, such as failure to provide information or services, selectively encouraging or discouraging applicants, varying the terms of credit offered, or refusing to extend credit. Further, the FHA requires lenders to make reasonable accommodations for people with disabilities when such accommodations are necessary to offer equal opportunities to apply for credit.

Equal Credit Opportunity Act

The Equal Credit Opportunity Act (ECOA) was enacted in 1974 and makes it unlawful for a creditor to discriminate against an applicant on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act. Creditors are also required to notify applicants of action taken on their applications; to report credit history in the names of both spouses on an account; to retain records of credit applications; to collect information about

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the applicant's race and other personal characteristics in applications for certain dwelling-related loans; and to provide applicants with copies of appraisal reports used in connection with credit transactions.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). HMDA mandates that financial institutions maintain, report, and publicly disclose loan-level information about mortgages. This data serves to assess whether lenders are meeting the housing needs of their communities, reveal lending patterns that may be discriminatory, and provide public officials with decision-making insights. To safeguard applicant and borrower privacy, the public data undergo modifications.

Community Reinvestment Act

The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community, including very low- and low-income persons and neighborhoods. In particular, the CRA counteracted redlining, the historical practice by which banks and other financial institutions would not provide loans to lower-income neighborhoods which contributed to the racial wealth gap. Under the CRA, federal regulators assess the performance of banks and other financial institutions in addressing the needs of all community members and neighborhoods. Banks and financial institutions are given a score of Outstanding, Satisfactory, Needs Improvement, or Substantially Noncompliant, which are published publicly.

On October 24, 2023, the Federal Deposit Insurance Corporation (FDIC), the Federal Reserve Board, and the Office of the Comptroller of the Currency (OCC) jointly issued a final rule aimed at enhancing and modernizing the regulations governing the implementation of the CRA to fulfill the law's objectives more effectively. Key objectives of the final rule include:

- Strengthen the achievement of the core purpose of the statute.
- Adapt to changes in the banking industry, including the expanded role of mobile and online banking.
- Provide greater clarity and consistency in the application of the regulations.
- Tailor performance standards in the application of the regulations.
- Tailor data collection and reporting requirements and use existing data whenever possible.
- Promote transparency and public engagement.
- Confirm that CRA and fair lending responsibilities are mutually reinforcing.
- Promote a consistent regulatory approach that applies to banks regulated by all three agencies.

Banking Regulators for the Federal Reserve

Banks with CRA obligations are supervised by three banking regulators (Federal Reserve Board - Federal Banking Regulators for the CRA), each of which maintains a dedicated CRA site that provides information about the banks they oversee and their CRA ratings and Performance Evaluations. Regulators are as follows:

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Board (FRB)

- Office of the Comptroller of the Currency (OCC)

Federal Reserve's Role

The Federal Reserve supervises state member banks or state-chartered banks that have applied for and been accepted to be part of the Federal Reserve System for CRA compliance. When doing so, the Federal Reserve considers violations of the Fair Housing Act, the Equal Credit Opportunity Act, other fair lending laws, and other illegal credit practices. To carry out its role, the Federal Reserve must:

- Assess the performance of state member banks under the CRA.
- Consider CRA performance alongside other supervisory data when evaluating applications for mergers, acquisitions, and branch openings.
- Disseminate information about community development techniques to both bankers and the public.

Below are the CRA ratings of banks for the City of San Bernardino. An institution's CRA rating is assigned using a four-tiered rating system: Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance.

Row #	ID	Agency	Exam Date	Bank Name	City	State	CRA Rating	Asset Size (x 1,000)	Exam Method
1	25070	FDIC	04/01/1992	BANK OF SAN BERNARDINO	SAN BERNARDINO	CA	Satisfactory	$1,000	Not Reported
2	25070	FDIC	10/01/1994	BANK OF SAN BERNARDINO	SAN BERNARDINO	CA	Satisfactory	$77,000	Not Reported
3	25070	FDIC	04/01/1997	BUSINESS BANK OF CALIFORNIA	SAN BERNARDINO	CA	Outstanding	$100,469	Small bank
4	25070	FDIC	01/01/2000	BUSINESS BANK OF CALIFORNIA	SAN BERNARDINO	CA	Outstanding	$207,531	Small bank
5	18863	FRB	06/17/2002	BUSINESS BK OF CA	SAN BERNARDINO	CA	Satisfactory	$385,563	Small bank

Figure 4: CRA Ratings for the City of San Bernardino (FFIEC)

B. Types of Loans

Conventional financing comprises market-rate-priced loans from private lending institutions such as banks, mortgage companies, and savings and loans. To support low and moderate-income households facing challenges in securing home mortgage financing from the private market, various government agencies provide loan products with below-market interest rates insured or "backed" by the agencies.

Table 42 below summarizes the disposition of home loan applicants submitted to financial institutions in 2022 in the City of San Bernardino. Most applications, approximately 72 percent, were for conventional loans, while the remainder fell under the umbrella of the various government-backed loan types. Both conventional and government-backed loans are discussed in more detail in the remainder of this section.

Table 42: Loan Type

Loan Type	# of Applicants	% of Applicants
Conventional	9,353	71.71%
FHA	3,022	23.17%
VA	664	5.09%
FSA/RHS	4	0.03%
Total	**13,043**	**100.00%**

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Data Browser, 2022

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Government Backed Loans

Many approved loans are government-backed. These encompass various types, such as those offered by the Federal Housing Administration (FHA), the U.S. Department of Veterans Affairs (VA), and the U.S. Department of Agriculture (USDA).

Government-backed loans generally have more lenient credit score requirements and lower down payment requirements and are available to those with recent bankruptcies. However, these loans may also carry higher interest rates and require most homebuyers to purchase mortgage insurance. Furthermore, government-backed loans have strict limits on the amount the homebuyer can borrow to purchase the home.

Federal Housing Administration (FHA)

FHA loans have helped people become homeowners since 1934. The FHA is part of HUD, insures the loan so that lenders can offer borrowers a better deal. FHA loans are specifically designed to assist low- to moderate-income families in achieving homeownership, making them particularly popular amongst first-time homebuyers. Advantages of FHA loans include:

- Low down payments
- Low closing costs
- Easy credit qualifying

Veterans Affairs (VA) Home Loans

The U.S. Department of Veterans Affairs (VA) guarantees loans to American veterans, military members currently serving in the U.S. military, reservists, and select surviving spouses (provided they do not remarry). Unlike conventional loans, VA home loans do not typically require a downpayment and have competitive interest rates, making them one of the most significant benefits available to eligible veterans and making homeownership more accessible. VA loans also do not require private mortgage insurance.

Types of VA loans include:

- **Purchase Loan:** For buying a home, offering better terms than private-lender loans.
- **Native American Direct Loan (NADL) Program:** Assists Native American veterans or veterans married to Native Americans in buying, building, or improving homes on federal trust land.
- **Interest Rate Reduction Refinance Loan (IRRRL):** Helps existing VA-backed home loan holders reduce monthly payments or stabilize payments.
- **Cash-Out Refinance Loan:** Enables veterans to take cash out of home equity for various needs such as paying off debt or funding education.

Rural Housing Service/Farm Service Agency (RHS/FSA)

The Rural Housing Service (RHS) is an agency of the U.S. Department of Agriculture (USDA) that offers various programs to enhance housing and essential community facilities in eligible rural areas. RHS offers loans, grants, and loan guarantees for both single and multifamily housing. Furthermore, RHS partners with nonprofit organizations, Native American tribes, state and federal government agencies, and local communities to provide technical assistance for loans and grants. The Farm Service Agency

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(FSA) is also backed by the USDA and offers loans to assist farmers and ranchers with obtaining financing needed to start, expand, or maintain family farms.

Conventional Loans

A conventional loan is a mortgage that is not sponsored by the government but is available through a private lender. Conventional loans are the most common type of mortgage loans, issued by private lenders such as banks, credit unions, and other financial institutions. The most common conventional loans are as follows:

- **Conventional conforming loans** are mortgages that meet the standards and limits set by Fannie Mae and Freddie Mac, the government-sponsored enterprises that buy and sell mortgages.
- **Jumbo loans** enable borrowers to exceed the maximum lending limit for conforming loans. However, they usually necessitate a higher credit score, a lower debt-to-income ratio (DTI), and a larger down payment.
- **Portfolio loans** are conventional loans that a lender retains in its own portfolio instead of selling it on the secondary market. This approach provides the lender with greater flexibility compared to the standards set by Fannie Mae and Freddie Mac, particularly regarding credit scores and debt-to-income ratios (DTIs).
- **Subprime loan** is a high-interest loan for borrowers with low credit ratings or other risk factors
- Amortized conventional loans provide homebuyers with a consistent monthly payment throughout the entire loan repayment period, without any balloon payments. These loans can feature either fixed or adjustable mortgage rates.
- **Adjustable-rate loans (ARM)** are a type of home loan where the interest rate can vary periodically, typically based on the performance of a specific benchmark. ARMs are also referred to as variable rate or floating mortgages.

It is important to look at loan and mortgage lending in a community to see how available loans are and at what types of terms and rates. Research based on HMDA data reveals that commercial banks and thrift institutions tend to lend less to low-income neighborhoods and areas predominantly inhabited by minorities. This is often a legacy issue based on the discriminatory practice known as redlining. The term "redlining" was coined by a sociologist named John McKnight in the 1960s. The term comes from the practice, used by both the federal government and private lenders, of drawing a red line on maps to show neighborhoods they would not invest in through lending based solely on demographic data. This practice threatens fair housing choice and can contribute to widening the ever-growing racial wealth gap in America.

C. Home Mortgage Disclosure Act and Data Analysis

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Consumer Financial Protection Bureau under Regulation C (12 CFR Section 1003). This regulation provides the public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities.
- Public officials in distributing public-sector investments to attract private investment to areas where it is needed.

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- In identifying possible discrimination lending patterns.

Loan Applications

Under the HMDA, lenders are required to disclose information on the disposition of home loan applications and on race, national origin, gender, and annual income of loan applicants. As shown in Table 42 above, 72 percent of 2022 applications in the City were for conventional loans, 23 percent were for FHA, five percent were for VA, and less than one percent were for FSA/RHS loans.

Refinancing

Refinancing is the process of replacing an existing mortgage with a new loan. Common reasons for refinancing include lowering fixed interest rates, adjusting loan durations, or switching between fixed-rate and adjustable-rate mortgages. People often refinance when interest rates change significantly, potentially resulting in savings on debt payments.

Home Improvement

A home improvement loan is a type of financing used to cover the costs of home upgrades, renovations, or repairs. Typically, a home improvement loan is secured by borrowing against the value of the home's equity which provides a lower interest rate than a personal loan or a credit card.

The table below shows the purpose of loans applied for in the City of San Bernardino based on FFIEC HMDA data for 2022. Most loans, approximately 40 percent, were for home purchase, followed by cash out refinancing at approximately 34 percent.

Table 43: Purpose of Loan Applied For

Loan Purpose	# of Applicants	% of Applicants
Home Purchase	5,255	40.29%
Home Improvement	960	7.36%
Refinancing	1,626	12.47%
Cash Out Refinancing	4,494	34.46%
Other Purpose	624	4.78%
Not Applicable	84	0.64%
Total	**13,043**	**100.00%**

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Data Browser, 2022

Table 44 provides an overview of the various actions taken by lenders in 2022. Reviewing these actions aids federal, state, and local governments in understanding the lending patterns of the various financial institutions at play. Of all categories, almost 46 percent of loan applications originated, meaning that the application was accepted for processing. Almost 17 percent of applications, however, were denied by the lender. This could be attributed to a variety of factors, such as income or credit history, as well as race. When race is a contributing factor for loan denial, that is discrimination and prohibited by federal and state law.

Table 44: Action by Lender

Action	# of Applicants	% of Applicants
Originated	5,951	45.63%

Denied	2,189	16.78%
Rejected by Applicant	404	3.10%
Withdrawn	1,998	15.32%
Incomplete	914	7.01%
Purchased	1,566	12.01%
Preapproval Denied	2	0.02%
Preapproval Rejected	19	0.15%
Total	**13,043**	**100.00%**

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Data Browser, 2022

Loan Applicants

As described above, the FHA prohibits mortgage lending discrimination based on race, color, national origin, religion, sex, familial status, or disability.

Race and Ethnicity

Table 45 shows that nearly 46 percent of loan applicants in the City of San Bernardino in 2022 identified as white and 43 percent identified as ethnically Hispanic or Latino (meaning of any race). According to 2021 ACS data, 45 percent of the City's population is white, and 68 percent identifies as ethnically Hispanic or Latino. The rate of applicants is nearly identical to the City's demographics for most racial and ethnic groups, though African Americans and Hispanic or Latino persons may be underrepresented.

Table 45: Race and Ethnicity of Loan Applicants		
Race	# of Applicants	% of Applicants
White	5,968	45.76%
Black or African American	880	6.75%
American Indian / Alaska Native	150	1.15%
Asian	749	5.74%
Native Hawaiian or Other Pacific Islander	32	0.25%
Joint	169	1.30%
2 or More Minority Races	34	0.26%
Unknown	5,061	38.80%
Total	**13,043**	**100.00%**
Hispanic or Latino	5,543	42.50%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Data Browser, 2022

Income

As shown in Table 46 below, the majority of loan applicants were either low or moderate-income, earning between 0-80% and 80-120% AMI. While only 14 percent of loan applicants had middle income, 19 percent were upper income, earning at or above 200% AMI. The City's profile of loan applicants appears to contain a healthy mix of varied incomes.

Table 46: Applicants by Income Level		
Income Level	Number of Applicants	Percentage of Applicants

Low (0-80% AMI)	3,432	26%
Moderate (80-120% AMI)	3,483	27%
Middle (120-200% AMI)	1,790	14%
Upper (200% > AMI)	2,436	19%
Unknown/NA	1,902	15%
Total	**13,043**	**100%**

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Data Browser, 2022

Lenders with Highest Denial Rates

Lenders were examined to determine denial rates using Home Mortgage Disclosure Act (HMDA) data through the FFIEC for all loan applications with census tracts in the City of San Bernardino. The lenders in Table 47 below had the highest number of applications available through the FFIEC for 2022 and are ranked by denial rate. United Shore Financial Services had the highest number of applications, 1,219, and the second-highest denial rate, approximately 42 percent. Meanwhile, Bank of America had the highest denial rate, with 58 percent of their 401 applications being denied a loan.

Table 47: Lenders with Highest Denial Rates

Rank	Lender	Applications	Denials	%
1	Bank of America, National Association	401	234	58.35%
2	United Shore Financial Services, LLC	1,219	510	41.84%
3	U.S. Bank National Association	235	93	39.57%
4	Lakeview Loan Servicing, LLC	230	75	32.61%
5	LoanDepot.com, LLC	248	50	20.16%
6	Wells Fargo Bank, National Association	241	48	19.92%
7	Rocket Mortgage, LLC	700	106	15.14%
8	Newrez, LLC	274	34	12.41%
9	PennyMac Loan Services, LLC	316	37	11.71%
10	Broker Solutions, Inc.	233	14	6.01%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Data Browser, 2022

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Chapter 5: Public Policies

Public policies, along with other factors, affect the development of housing. In turn, they impact the range and location of housing options available to residents. Fair housing laws, as described in Chapter 1, are intended to encourage an inclusive living environment and active community participation. Assessing public policies and related practices helps identify potential impediments to fair housing opportunities. This chapter provides an overview of public policies, regulations, standards, and practices, including housing element law and compliance, land use, and zoning.

A. Housing Element Law and Compliance

California housing element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. For the private market to adequately address housing needs and demand, local governments must adopt land-use plans and regulatory systems that provide opportunities for and do not unduly constrain housing development. California housing element law requires each jurisdiction to:

- Identify adequate sites that will be made available through appropriate zoning and development standards and with the services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels to meet the city's regional housing needs.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The City's current Housing Element was adopted on February 21, 2024, and was certified as substantially compliant with State Law by the California Department of Housing and Community Development (HCD) on June 17, 2024.

B. Land Use Element

The Land Use Element of the City's General Plan designates the general distribution, location, and extent of residential, commercial, industrial, public/quasi-public, and open space uses. Regarding housing, the Land Use Element establishes a range of nine residential land-use designations, specifies densities, and suggests the types of housing appropriate in a community. The Land Use Element is implemented through the Development Code, establishing zones where residential uses are permitted. Development density ranges from one unit per acre in single-family designations to 130 dwelling units per acre in the CR-2 zone.

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Table 48: Residential Land Use Designations and Zoning Districts			
General Plan Land Use Designation	Zoning District	Primary Residential Type(s)	Du/Ac
Residential Estate	RE	Single-family detached in an estate setting	1
Residential Low	RL	Single-family detached in low-density setting	3.1
Residential Suburban	RS	Single-family detached in high quality suburban setting	4.5
Residential Urban	RU	Single/multi-family attached and detached residences	8
Residential Medium	RM	Multi-family dwellings, all types	12
Residential Medium High	RMH	Multi-family dwellings including apartments and condominiums	24
Residential High	RH	Multi-family dwellings including apartments and condominiums	31
Commercial Office	CO	Offices, retail, and senior housing/congregate care	47
Commercial General	CG-2	Commercial and multi-family dwellings	12 (west of I-215); 21 east
Commercial Regional	CR-2	Vertical mixed-use	130

Source: City of San Bernardino 2021-2029 Housing Element

C. Development Code

The City's existing Development Code regulates the type, location, density, and scale of residential development and exists to protect and promote the health, safety, and general welfare of residents. In addition, the Development Code serves to preserve the character and integrity of existing neighborhoods.

Zoning & Provisions for Diversity Housing Types

Residential uses are allowed in residential and some commercial districts. The City's zoning permits a range of housing types, which is essential to providing a full range of housing choice. Table 49 lists housing types allowable with approval of a Development Permit or Conditional Use Permit, permitted by-right, or prohibited.

Table 49: Housing Types by Zone											
Housing Types	RE	RL	RS	RU	RM	RMH	RH	RSH	CO	CG-2	CR-2
Single-Family	D	D	D	D	D	D	D	X	X	X	X

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Multi-Family	X	X	X	D	D	D	D	X	X	C	C
Condominium or Townhouse	D	D	D	D	D	D	D	X	X	X	X
Manufactured Housing	D	D	D	D	D	D	D	X	X	X	X
Mobile Home Park or Subdivisions	D	D	D	D	D	D	D	X	X	X	X
Senior Housing/ Congregate Care	X	X	X	D	D	D	D	X	C	C	C
Community Care Facility (≤ 6 persons)	P	P	P	P	P	P	P	X	C	C	C
Emergency Shelters	X	X	X	X	X	X	X	X	X	X	C
Single Room Occupancy	X	X	X	X	X	X	X	X	X	C	C
Mixed Used	X	X	X	X	X	X	X	X	C	C	C

RE = Residential Estate
RL = Residential Low
RS = Residential Suburban
RU = Residential Urban
RM = Residential Medium
RMH = Residential Medium High
RH = Residential High
RSH = Residential Student Housing
CO = Commercial Office
CG-2 = Commercial General
CR-2 = Commercial Regional
P = Permitted
D = Development Permit
C = Conditional Use Permit
X = Prohibited

Source: City of San Bernardino Development Code, 2023

Density Bonus

In accordance with State Government Code Section 65915, to promote the development of affordable housing, a density increase of 25 percent over the otherwise maximum allowable residential density may be permitted when developers meet conditions. This is known as a "Density Bonus." The City also has an amenities bonus provision for a density increase of up to 15 percent in zones RU, RM, RMH, RH, CO-1 & 2, CG-2, and CR-2.

Parking

Overly generous parking requirements impose economic and environmental costs. The result is an impact on the availability and affordability of housing, including homeownership. In addition, when

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land availability is constrained, parking structures are often necessary to meet parking requirements for larger projects. As the number of parking spaces required increases, development costs increase as well. The City recognizes these challenges and offers incentives, such as reduced parking standards within areas served by transit, to alleviate potential constraints to development.

Table 50: Parking Standards for Residential Uses		
Housing Type	Parking Standard	Guest Parking
Conventional Housing		
Single-Family	2 covered garage spaces per unit	None
Planned Residential	2 covered garage spaces per unit	1 space/ 5 du
Mobile Home Parks	2 covered garage spaces per unit	1 space/unit
Multi-family - Studio	1 space per unit	None
Multi-family – 1 bdrm	1.5 covered spaces per unit	1 covered space for each 5 units
Multi-family – 2 bdrm	2 covered spaces per unit	1 covered space for each 5 units
Multi-family – 3 bdrm	2.5 covered spaces per unit	1 covered space for each 5 units
Senior Apartments	1 covered space per unit	1 covered space for each 5 units
Special Needs Housing		
Senior Congregate Care	0.75 covered space per unit	None
Emergency Shelters	1 space/1000 sf of GFA or FTE on largest shift	None
Transitional Housing, Supportive Housing, Residential Care, Navigation Center, Accessory Dwellings	Unspecified	Unspecified

Source: City of San Bernardino 2021-2029 Housing Element

Definitions

Local zoning definitions that should be consistent with the Fair Housing Act include family, group homes, assisted care facilities, boarding homes, single-room occupancy, homeless shelters, second dwelling occupancy units, and reasonable occupancy.

California court cases have ruled that a definition of "family" that: 1) limits the number of persons in a family; 2) specifies how members of the family are related (i.e. by blood, marriage or adoption, etc.), or 3) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. Court rulings state that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction and therefore violates rights of privacy under the California Constitution. A Zoning Ordinance also cannot regulate

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residency by discrimination between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of people constituting a family. The City's definition does not serve to impede housing choice.

The City's current "Family" definition is not overly restrictive. This definition was amended or "cured" of any discriminatory language in 2011. The current definition is as follows: "Family" means 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.

In 2024, the City of San Bernardino Municipal Code was amended to allow group homes or small residential care facilities (RCF) serving six or fewer persons that operate as a single housekeeping unit and that do not provide licensable services in all zones allowing single or multiunit residences. The current zoning ordinance does not include boarding homes.

Assembly Bill 2339 requires an assessment of the suitability of sites for emergency shelters. An emergency shelter is generally defined as any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Emergency shelters are needed to meet the immediate short-term needs of the unsheltered homeless. Zoning for Emergency Shelters The Emergency Shelter Overlay Zone (Chapter 19.10-E) permits emergency shelters serving up to 60 persons/shelter without discretionary review in accordance with an administrative permit. The overlay covers five designated areas in the City that may be in one of three zoning districts: Industrial Light, Commercial Heavy, and Office Industrial Park.

Individual with a Disability

Federal law requires that new housing comply with common accessibility standards in the building code. The City regulates reasonable accommodation as stated in Chapter 19.63, Reasonable Accommodations. This section establishes a procedure for an individual with a disability seeking equal access to housing to request reasonable accommodation as provided by the Federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act.

A reasonable accommodation is the act of providing flexibility in the application of land use and zoning regulations, including modification or waiver of certain requirements to accommodate the needs of an individual with a disability. Requests may be submitted in writing to be reviewed by the Director for approval or denial. The request shall identify the project, the standard that presents a barrier, and the disability that requires reasonable accommodation. The Director may request additional information for deciding, consistent with state and federal fair housing acts and considering privacy rights of the individual. Prior to issuance of permits issued for construction including 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. Prior to approval, the Director shall grant a request for reasonable accommodation only if all of the following findings are made: The subject home will be used by an individual with a disability, the requested accommodation is necessary to make specific housing available to an individual with a disability, the requested accommodation would not impose an undue financial or administrative burden on the City, and the requested accommodation would not require a fundamental alteration in the nature of a City program or law, including land use and zoning. There is no fee associated with submitting a request.

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Appeals may be made to the Planning Commission, which may then be appealed by the Mayor and Common Council.

D. Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is a component of the 2021-2029 Housing Element. Every eight years, the State of California provides the Southern California Association of Governments (SCAG) with the number of new housing units that it must plan for by the end of the planning period. SCAG divides the allocation among all local governments in the region it represents. The City is allocated 8,123 units divided into income/affordability categories. The number of units for very low-income households is 1,415, 1,097 for low-income, 1,448 for moderate-income, and 4,163 units for above moderate-income households. While the City is not required to build or finance the construction of these units, it must identify adequate sites to accommodate them.

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Chapter 6: Fair Housing Profile

This section of the AI provides information on the institutional structure of the homeownership and rental markets in the City of San Bernardino. It also includes local, state, and federal data on fair housing complaints. The Fair Housing Act prohibits discrimination concerning the sale, rental, and financing of housing based on race, religion, national origin, sex, familial status, and disability. The Act also states that "it is the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States."

A. Fair Housing Practices in the Homeownership Market

This section analyzes potential impediments to fair housing in homeownership. Before buying a home, a potential buyer must first search through advertisements or listings, then obtain a loan, before finally working with a real estate agent to close a deal.

Advertising

Buying a home usually begins with searching through advertised listings of homes. Prospective buyers may choose to work with a Real Estate Agent or conduct a search independently. Homes are typically advertised in newspapers, magazines, or the internet, which has become the most common tool.

Advertisements for homes must avoid using discriminatory language, such as describing current residents or the neighborhood in racial or ethnic terms, resident preferences, lack of accommodations for disabled residents, or the convenience of local religious institutions. Language like this may indicate a preference for certain types of people, such as families or people of a certain religion, and can be discriminatory.

At times, agents may be found guilty of discrimination, even if it is unintentional. The National Fair Housing Alliance provides guidelines for responsible advertising to housing providers. They advise providers to focus on the amenities that the listing has to offer rather than describing their ideal owner or renter, to include the fair housing logo and/or the "Equal Housing Opportunity" slogan, and to avoid statements that exclude any protected classes.

In the analysis of 20 for-sale listings on Trulia, none were found to include potentially discriminatory language.

Table 51: Potentially Discriminatory Language in Listings of For-Sale Homes

Discrimination Type	Number of Listings
No Discriminatory Language	20
Income Related	0
Household Size/Family Related	0
Disability Related	0
Religion Related	0

Source: www.trulia.com, accessed August 2024

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Lending

Lending institutions determine if a potential buyer will qualify for a loan. As part of the lending process, applicants are asked to provide information such as gender, race, and income, which is then used for reporting required by the Home Mortgage Disclosure Act and the Community Reinvestment Act. However, this information may be used to discriminate during the application process. The previous section of this AI discussed lending in more depth, along with the various types of loan types offered by both private and public lenders.

As mentioned previously, the Community Reinvestment Act (CRA) of 1977 was passed to address discrimination in housing practices such as redlining.

Credit Scores

Credit histories are significant factors in lending institutions approving home loans. Applicants with higher scores are more likely to be given conventional loans, while applicants with lower scores are more likely to receive FHA or government-backed loans and pay higher interest rates.

Real Estate Agents

Real estate agents may engage in discriminatory practices against clients or prospective clients, be it intentional or unintentional. An agent may choose not to work with a client due to a protected characteristic, choose not to show all available housing units, or steer a client to a particular neighborhood based on their race, income, or other factors. These practices are discriminatory and illegal.

The National Associated of Realtors (NAR) established a Fair Housing Program to provide guidance and resources to realtors in delivering fair housing services to all individuals through policy advocacy and legal guidance. The term "realtor" refers to a licensed real estate professional who is a NAR member, though not all licensed real estate brokers and salespersons belong to NAR.

The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons in California. To renew a real estate license, a licensee is required by DRE to complete 45 hours of training on topics including ethics, fair housing, and implicit bias. This training provides education and resources for agents to identify and avoid discriminatory housing practices, thereby promoting fair housing.

The California Association of Realtors (CAR) has many local associations throughout the state. San Bernardino is served by the Inland Valleys Association of Realtors (IVAR). In addition, the Inland Empire Association of Realtist (IEAOR) also serves the San Bernardino area as a chapter under the umbrella of the California Association of Real Estate Brokers (CAREB) and the National Association of Real Estate Brokers (NAREB). A realtist is a real estate professional who is a member of NAREB.

B. Fair Housing Practices in the Rental Housing Market

This section analyzes potential impediments to fair housing in renting. The process of renting a housing unit involves:

- Searching advertisements
- Viewing rental units

- Completing a credit check and submitting an application
- Approval (or denial)
- Payment of a security deposit and signing of a rental agreement/lease (in the case of approval)

Advertising

Similarly to for-sale housing advertisements, rental unit advertisements cannot indicate any preference, limitation, or discrimination based on characteristics protected under the federal Fair Housing Act and other federal and state laws outlined in Chapter 1.

Advertisements for rental units often include discriminatory language. This may involve expressing a preference for families, students, or single individuals and references to the allowance of pets. Language such as this may indicate a preference for certain types of people, while excluding people who may need a guide dog or emotional-support animal. Like prospective homeowners, prospective renters can also face discrimination when responding to advertisements or viewing a unit based on their perceived race, social class, or sex.

An examination of 20 rental listings through Trulia found three income-related and two disability-related instances of potentially discriminatory language.

Table 52: Potentially Discriminatory Language in Rental Listings

Discrimination Type	Number of Listings	Potentially Discriminatory Language
No Discriminatory Language	15	N/A
Income Related	3	Satisfactory credit and rental history, subjecting applicants to credit, criminal, and rental history checks, no bankruptcies allowed in the past 3 years, and requiring 3 times the rent in gross income.
Disability Related	2	"No pets allowed"
Household Size/ Family Related	0	N/A
Religion Related	0	N/A

Source: www.trulia.com, accessed August 2024

C. Fair Housing Complaints and Enforcement

Several public and private agencies have mechanisms in place to take complaints about and follow up on housing discrimination or unfair housing practices. Analyzing instances or patterns of complaints can assist in assessing the nature and level of potentially discriminatory housing practices in the private sector.

Office of Fair Housing and Equal Opportunity (FHEO)

At the federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the U.S. Department of Housing and Urban Development receives complaints of housing discrimination. FHEO establishes policies to protect the fair housing rights of Americans and enforces federal laws. Reports of alleged discrimination must be filed within one year of the last date of the alleged act and will be investigated

by either FHEO or will be referred to another organization. HUD or the Department of Justice (DOJ) may take legal action if it is found that a law was violated.

From 2019 to 2020, 42 fair housing discrimination cases in the County of San Bernardino were forwarded to the Office of Fair Housing and Equal Opportunity and published as public data. The table below presents the reasons for and numbers of cases forwarded. Disability was included as a basis for complaint in 59.5 percent of cases. After that, were cases alleging retaliation at 26.2 percent and race at 16.6 percent.

Table 53: Basis for Complaint		
	#	Percent
Race	7	16.6%
Black or African American	6	14.3%
White	1	2.4%
Color	1	2.4%
National Origin	3	7.1%
Hispanic Origin	3	7.1%
Disability	25	59.5%
Sex	5	11.9%
Retaliation	11	26.2%
Familial Status	6	14.3%
Note: Complaints may be made on multiple bases. Therefore, the percentages do not total 100 percent.		

Source: 2019 and 2020 U.S. Department of Housing and Urban Development, FHEO Data

California Civil Rights Department (CRD)

The California Civil Rights Department operates similarly to the FHEO on the state level, investigating and attempting to settle or escalating complaints of legal violations of discrimination. The CRD has up to one year after an initial complaint is filed to complete their investigation and potentially take the complaint to civil court if necessary. CRD is a participant of and has received funding from HUD's Fair Housing Assistance Program (FHAP) to enforce fair housing practices in the State of California.

The CRD's 2022 Annual Report shows 36 housing complaint cases in the County of San Bernardino.

Inland Fair Housing and Mediation Board

The Inland Fair Housing and Mediation Board (IFHMB) is a nonprofit organization that has served San Bernardino County and parts of Riverside and Imperial Counties in Southern California since 1980. IFHMB's services are provided to the community free of charge. They are funded through the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) program provided by the City of San Bernardino and the County of San Bernardino. The purpose of IFHMB is to help community members resolve housing discrimination, homeownership sustainability, rental complaints, and disputes in court through the provision of resources, recommendations, education, and mediation.

IFHMB provides numerous services including:

- Information, investigation, education, and conciliation and/or referrals of housing discrimination complaints.

- Fair housing workshops to educate housing providers, tenants, homeowners, and financial and lending institutions.
- Housing counseling, including default and foreclosure prevention counseling.
- Information to tenants, landlords, mobile home park owners, and mobile home residents on their rights and responsibilities.
- Mediation as an alternative to resolving housing issues for tenants, property managers, and owners.

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Chapter 7: Fair Housing Progress

This section reflects upon the goals and actions set through the City's 2020-2025 Analysis of Impediments to Fair Housing Choice report. Progress on each goal or action is presented in the table below.

Table 54: Fair Housing Progress Since 2020

Actions		Progress
Goal 1: Provide housing solutions and incentives for special needs populations.		
1.1	Work with agencies that assist with the housing needs of the elderly, those with disabilities, and people who are homeless. (Single-parent households make up almost 19% of total households. 13% of the population is reported to have a disability. 23% of total homes contain at least one or more seniors).	The City is funding its Homeless Outreach Prevention Education Campus (HOPE Campus) to provide Emergency Shelter. The HOPE Campus will feature congregate and non-congregate shelter units, laundry facilities, kitchen facilities, secure storage for personal items, and supportive services. The project is the recipient of HOME ARP funds. The City partnered with Hope the Mission and in early 2025 with the Salvation Army, two non-profit agencies that provide dedicated street outreach services and intensive case management services. Additionally, to partnerships with non-profits, the city created the City's Homeless Outreach Team (HOT) to work with multiple city departments to engage and assist the unhoused community. HOT also works with the County's Coordinated Entry System (CES) to prioritize individuals to be placed in emergency shelter, offer housing options, motel vouchers, refer to mental health, and other essential services. Because emergency shelter is not always available, homeless outreach workers provide motel vouchers when available. The City was awarded $ 34.9 million from the State to construct a 140-bed, non-congregate, interim housing facility called the San Bernardino Community Wellness Campus to better assist the city's most marginalized population -

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		chronically homeless men. In the City, homeless men outnumber homeless women two to one. The campus will assist men who have been incarcerated, those who are HIV positive, male veterans and unsheltered men in general. An array of onsite supportive services will be provided, and the campus will have a Federally Qualified Healthcare Center (FQHC) that provides comprehensive medical services. The project completion date is August 2025. The City supports HACSB's efforts to obtain additional rental assistance funding, especially for seniors and lower-income households. Additionally, the City considers this population and issue with rental assistance funding to be a direct issue with the City's underserved needs.
1.2	Work with housing developers to create affordable housing options for special needs populations.	The City supported, in part, the construction of the first three phases of Arrowhead Grove's affordable housing development. The City staff engaged with Community Housing Developer Organizations and developers to discuss Infill Housing and multi-family affordable housing projects.
Goal 2: Increase affordable housing opportunities.		
2.1	Support integrated housing approaches near designated employment areas/centers and transit.	In FY 21-22, the City utilized HOME program income for Arrowhead Grove, formerly Waterman Gardens Public Housing Community, for phase two of the multi-phase Rental Assistance Demonstration (RAD) project. Crestview Terrace Phase III entails the building of 184 apartment homes, including one-, two-, and three-bedroom affordable units for mixed-income family apartments to households incomes ranging from 30% to 60% of the area median income (AMI). This continues to be an ongoing project for the City. The Arrowhead Grove Redevelopment is located near major employment

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		centers and serviced by multiple Omnitrans bus routes, facilitating easy access to jobs and services.
2.2	Promote building new units containing 2 or 3 bedrooms for larger families.	The city has engaged in public-private partnerships to preserve and develop affordable housing. For example, Standard Communities, in collaboration with Housing on Merit, acquired and renovated Foothill Villas, a 239-unit affordable housing community. The $20.4 million renovation included upgrades to individual units and common areas, aiming to maintain long-term affordability for low-income families.
2.3	Encourage innovative low-cost housing materials such as modular construction.	Community Wellness Campus (2024–2025): In partnership with Dignity Moves and Lutheran Social Services, the city is developing 140 modular housing units for chronically homeless men and veterans. Supported by a $34.9 million Homekey grant, this project will offer interim housing and wraparound services, with construction beginning in April 2024 and a grand opening planned for August 2025. Dignity Moves Valencia Grove Redevelopment: The Housing Authority of the County of San Bernardino utilized modular construction to transform the aging Valencia Grove public housing site into a modern, mixed-income community. The first phase replaced 62 units with 85 new modular units, with plans to expand to 228 units. This project received national recognition for its innovative design and cost-effectiveness.
2.4	Identify funding for transitional and permanent supportive housing development.	The City plans to amend the Development Code to adequately define transitional and permanent supportive housing and permit these uses based on unit type, in accordance with Senate Bill 2.

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		During the FY 2023-24-year, the City's ESG program supported four projects with an Emergency Shelter component, serving a total of 481 individuals from 340 households.
2.5	Understand the specific redevelopment obstacles related to construction on the local level that can be changed.	The City has also made a major effort to eliminate constraints, with respect to land use regulations, by developing and adopting a new Development Code that unified and simplified the City's development regulations and processes. That effort was followed by a reorganization by the City to unify the various development-related departments into a single Community Development Department and a one-stop permit counter. The City has made the following additional amendments to the Municipal Code to further reduce barriers to affordable housing: General Lot Consolidation Incentive, Density Bonus Provisions, Transitional and Supportive Housing, and Streamlined Processing.
2.6	Explore more ways to work with developers to promote housing construction training opportunities for the homeless.	Not pursued
Goal 3: Increase homeownership opportunities for all ethnicities.		
3.1	Work with local banks (particularly Wells Fargo) in expanding downpayment assistance programs for first-time homebuyers. Partner with lenders to encourage lending to low-income first-time homebuyers.	Not pursued
3.2	Incorporate homeownership education, budgeting, and home maintenance education and skills into housing programs.	The City established a First Time Homebuyer program (Infill Housing), which instead of requiring that a family resell their home to another low-income household, utilizes recapture provisions to allow a family to capture the equity in their house, thus accumulating wealth which is the most effective way of reducing the number of poverty level households. The City also collaborated with Neighborhood Housing Services of the Inland Empire (NHISE) to provide different educational forums on the

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		topics of homeownership and financial literacy. Through their program, NHISE successfully reached a total of 12 City residents in FY 2023-24 and an additional 68 City residents in FY 2024-25 as they continued working even after the end of their agreement.
3.3	Retain existing homeowners by promoting and enhancing funding to the City's existing Owner-Occupied Housing Rehabilitation Program, as well as tap into other future housing reinvestment programs and resources that may exist in the region.	Development of Owner Occupied Residential Rehabilitation Program that provides financial assistance to income-qualified San Bernardino homeowners to make necessary repairs to their homes.
Goal 4: Create public awareness of fair housing laws and affordable housing advocacy.		
4.1	Coordinate with the IFHMB to enhance local outreach about the positive impacts of affordable housing.	The City works with Inland Fair Housing and Mediation Board and Neighborhood Partnership Housing Services, Inc. to provide First Time Homebuyer workshops to educate potential borrowers in the complete process of purchasing a home. These agencies also provide other services such as Default/Foreclosure Prevention and Reverse Mortgage counseling services; and financial education workshops that help homeowners preserve their housing. 1911 people were assisted in PY21-22, 1,214 low-income residents in PY22-23 and 1,281 in PY 23-24.
4.2	Work with IFHMB, as part of its Fair Housing contract, to annually review and report on apartment rental advertisements released by private housing companies.	Since 2020, the City of San Bernardino has actively collaborated with IFHMB to advance fair housing initiatives, particularly focusing on public awareness and monitoring rental advertising practices. IFHMB provides community workshops. The city's Housing and Homeless Division hosts quarterly tenant rights workshops aimed at educating residents about their housing rights and responsibilities. IFHMB provides free services to low- and moderate-income individuals, including education on housing rights and responsibilities, landlord/tenant mediation, housing counseling, and alternative dispute resolution.

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4.3	Enhance local land use and zoning laws. a. Identify priority goals and target areas for new housing and/or housing rehabilitation where employment and transit opportunities exist.	The City is committed to continuing the streamlining of development activities and regulations and will continue to analyze potential programs that seek to eliminate land use constraints, particularly as related to the provision of new housing and rehabilitation of existing housing.
4.4	Create regulations conducive to affordable housing needs. Introduce appropriate building envelope sizes for each zoning district and be inclusive with regards to unit size, building height, reduced parking, transit, and pedestrian connectivity.	
Goal 5: Increase earning capacity of low- and moderate-income residents.		
5.1	Work with major employers to develop incentives for new housing near their work.	Not pursued
5.2	Improve education and provide skills training in education, healthcare, manufacturing, and construction jobs. a. Create partnerships with California's Employment Development Department, Workforce Development Board, Workforce Development Aging & Community Services, California Building Industry Association, Southern California Building Association, San Bernardino Valley College, Riverside Vocational College, Concorde Career College, and the Career Technical Education. b. Strive to collaborate with educational and vocational institutions to provide workforce readiness programs.	The San Bernardino Community Development and Housing Department will continue consulting with a wide variety of agencies and organizations such as HACSB, County Workforce Development, County Department of Behavioral Health, and County Office on Aging and Adult Services involved with the delivery of housing, supportive services, and economic development to low- and moderate-income San Bernardino residents. Workforce Development, for example, provides job placement services for people in the County and provides up to three months of paid on-the-job training and any equipment that an employee may require for their new job.
5.3	Work with higher education systems to create college-readiness programs, financing solutions, and family preservation programs for first-generation students.	In 2022 and 2023 the City directly works SBCCD to co-host an annual mixer and open house for residents and students to discover accelerated workforce training programs that match relevant available jobs.
5.4	Increase opportunities that target "Second Chance," persons with disabilities, at-risk homeless individuals, and job retraining programs. Agencies such as the Center for Employment Opportunities, Technical Employment Training, Inc., Department of Workforce Development Board, America's Job Centers of California, and San Bernardino County Workforce Investment Board.	Inland Empire Small Business Development Center to train prospective future small business owners. 12 small businesses were assisted in PY22-23 and 18 businesses in PY23-24.

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Chapter 8: Fair Housing Action Plan

This chapter will discuss the findings from the Analysis of Impediments to Fair Housing Choice. The major or high priority contributing factors to fair housing choice, based on community engagement activities and data analysis, include:

- High cost of housing (rental and homeownership)
- High cost of development
- Lengthy permitting process
- LMI homeowner and rental housing rehabilitation
- Senior housing and services
- Cost-burden
- Overcrowding
- Chronic homelessness
- Lack of information about available services
- Fair housing enforcement and education
- Lending

A. Recommendations for Ongoing Actions

The following findings and recommended actions are based on data analysis performed for this report, stakeholder outreach, and community participation. Actions, goals, and categories are not in any particular order of priority.

Expand Affordable Housing Options

Data collected throughout the Analysis of Impediments process, along with stakeholder and resident outreach, indicates a high priority need for additional affordable housing options in the City. As cited in Chapter Three, 52.17 percent of LMI homeowners are cost-burdened and 75.21 percent of LMI renters are cost-burdened. 2021 ACS data reveals that 69.73 percent of rental units in the City cost upwards of $1,000 per month, which is unaffordable to the City's lowest-income renter households. Through the Stakeholder Survey, 75 percent of respondents rated affordable housing as a critical priority need.

Overcrowding was also identified as an issue through data analysis conducted in Chapter Three. Findings show that 8.91 percent of homeowners and 18.16 percent of renters in the City are overcrowded, regardless of income. A significant portion of the City's households, 22.81 percent, are large households (five or more people). However, only 7.28 percent of rental units and 27.31 percent of current ownership units have four or more bedrooms.

Housing growth has been slow over the past decade, despite growth in population and a local demand for more affordable housing options. Therefore, continuing to work to expand affordable housing options available to San Bernardino residents is critical in the pursuit of affirmatively furthering fair housing.

GOAL 1: SUPPORT THE EXPANSION OF AFFORDABLE HOUSING STOCK.

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Recommended Actions:
1.1 Increase the availability of affordable senior housing options.

1.2 Develop and/or modify existing housing units with four or more bedrooms to support large households, particularly rental units.

1.3 Evaluate vacant housing units for rehabilitation.

1.4 Expand housing and commercial development opportunities by creating housing on in-fill sites.

1.5 Support the development of Accessory Dwelling Units (ADUs) as a source of affordable housing.

1.6 Support owner-occupied and renter-occupied housing rehabilitation.

1.7 Evaluate current permitting processes for areas of improvement/change to shorten length of time and mitigate barriers to development.

Housing Discrimination

Addressing housing discrimination throughout the community is essential to fostering inclusive and equitable neighborhoods. It ensures that residents have equal access to housing opportunities on a community-wide scale, thereby promoting diversity, social integration, and fair housing. Combating discrimination enables households to secure safe, affordable housing, significantly enhancing their quality of life and overall economic stability.

Findings reported in Chapter Six suggest potentially discriminatory language in rental advertisements reviewed online. Simultaneously, lending data analyzed in Chapter Four found that 16.78 percent of all home loan applicants were denied. While these denials do not inherently mean that discrimination occurs, ensuring that community members know their rights and that housing and lending providers have fair housing education promotes equal access and avoids discrimination.

When residents were asked how informed they feel about their tenant and homeowner rights and responsibilities through the Community Needs Survey, only 14 percent cited being very informed. Conversely, 16 percent of respondents cited not being informed at all, while 29 percent cited being not very informed.

The City can both continue its current efforts to prevent housing discrimination while expanding efforts to address identified issues.

GOAL 2: SUPPORT THE PREVENTION OF HOUSING DISCRIMINATION AND THE PROMOTION OF FAIR HOUSING.

Recommended Actions:
2.1 Continue to support and fund local fair housing service programs.

2.2 Provide fair housing education seminars and/or workshops to inform the public on tenant and homeowner rights and responsibilities.

2.3 Work with a local fair housing service provider to periodically review housing advertisements for potentially discriminatory language and take appropriate actions to resolve issues when necessary.

Building Housing Partnerships

Feedback through the Community Meeting pointed to barriers to affordable housing development, including costs, permitting times, and the general hurdles associated with housing projects. Stakeholders who responded to the Community Needs Survey echoed support for fostering partnerships with local businesses, nonprofits, and government agencies to maximize resources and support affordable housing initiatives. With the complexity of affordable housing development, bringing stakeholders from all across the community to work toward a shared vision or goal can further promote equal housing access and mitigate barriers to both access and development for those involved.

GOAL 3: FOSTER PARTNERSHIPS WITH LOCAL AND REGIONAL STAKEHOLDERS.

Recommended Actions:
3.1 Host a roundtable discussion within the housing community with both public and private housing experts to maximize ideas, expertise, and resources.

3.2 Invite public service groups, nonprofits, community leaders, housing developers, lenders, and other stakeholders to participate in community forums to expand partnerships and bolster support and initiatives for affordable housing development.

Lending

Homeownership and lending are directly intertwined. To afford the purchase of a home, the vast majority of households must take on mortgages and other loans, which can be difficult to obtain. Even if a household can attain a loan, the costs associated with homeownership can be difficult to maintain due to changing circumstances, such as the loss of income, the diagnosis of a medical condition, or expensive damage that need to be fixed.

As discussed in Chapter Four, Home Mortgage Disclosure Act (HMDA) data shows that 16.78 percent of applicants were denied in 2022. The highest denial rate of top lenders examined in the City was 58.35 percent, suggesting the potential for discriminatory practices occurring. Overall, 26 percent of applicants had incomes between 0 to 80 percent of the area median income (AMI) and 27 percent of applicants had incomes between 80 to 120 percent AMI. The majority of applicants, 71.71 percent, applied for conventional loans which often have more stringent requirements and higher interest rates as opposed to government-backed loans.

Community outreach efforts, including the Community Needs Survey and the Community Meeting, revealed support for first-time homebuyer assistance for LMI households.

Supporting fair and equal lending practices in the community can support equal access to homeownership.

GOAL 4: SUPPORT HOMEOWNERSHIP

Recommended Actions:
4.1 Partnerships with CHDOs: The city has collaborated with Community Housing Development Organizations (CHDOs), to develop single-family homes on vacant, city-owned properties. These homes are intended for sale to income-qualified families, aiming to increase homeownership among low- and moderate-income residents.

4.2 Pursue funding for homebuyer assistance and housing rehabilitation assistance for LMI residents.

4.3 Promote FHA and VA loans in any City provided affordable homeownership program.

4.4 Provide financial literacy, lending, and homebuyer education to residents to promote safe lending practices and prevent discrimination. By placing emphasis on reaching the City's most vulnerable populations, such as extremely low-income households, seniors, persons with limited English proficiency, and persons with disabilities, discrimination can be mitigated.

Resource Accessibility and Integration

Expanding resources and the ease of accessibility can help mitigate impediments to fair housing while promoting all-around community wellbeing. Data analysis and community engagement revealed a need for continued and greater connection to resources, as well as an issue of chronic homelessness. The City already has numerous initiatives geared toward providing services for LMI residents and reducing homelessness. Expanding and continuing these efforts ensures greater success for the City's most vulnerable populations.

GOAL 5: CONNECT RESIDENTS WITH LOCAL, STATE, AND FEDERAL RESOURCES ON FAIR HOUSING AND COMMUNITY SERVICES.

Recommended Actions:
5.1 Allocate CDBG funding for public facilities and infrastructure in the City's designated LMI areas.

5.2 Continue working with and funding local service providers assisting the community with needs such as food insecurity, healthcare, homelessness, youth services, and more.

5.3 Promote the San Bernardino HOPE campus to community members, local businesses, and community organizations so that people are well-informed on resource availability.

5.4 Go above and beyond the Limited English Proficiency (LEP) Plan and conduct outreach and assistance to non-English speakers in the community who do not meet the LEP threshold but would benefit from targeted outreach services.

Appendix A: Federal Fair Housing Laws

- *Title VI of the Civil Rights Act of 1964 (Title VI):* Title VI aims to safeguard the rights of individuals, regardless of race, color, or national origin, in programs and activities that receive federal funding or financial assistance.
- *Title VIII of the Civil Rights Act of 1968 (Fair Housing Act):* The Fair Housing Act, enacted in 1968 and amended in 1988, prohibits housing discrimination against seven protected classes: race, color, religion, sex, national origin, familial status, and disability. The 1988 amendments added "familial status" and "disability" as protected classes and enhanced HUD's authority to enforce compliance with federal law.
- *Section 504 of the Rehabilitation Act of 1973 (Section 504):* Section 504 sets forth guidelines that prevent individuals with disabilities from being denied access to housing under programs and activities that receive federal funding or financial assistance.
- *Section 109 of Title I of the Housing and Community Development Act of 1974 (Section 109):* Section 109 prohibits housing discrimination based on race, color, national origin, sex, or religion in programs and activities that receive federal funding or financial assistance.
- *Title II of the Americans with Disabilities Act of 1990 (Title II):* Title II prohibits discrimination based on disability in public entities' programs, services, and activities. HUD is responsible for enforcing Title II concerning public housing, housing assistance, and housing referrals managed by state and local jurisdictions.
- *Architectural Barriers Act of 1968 (Architectural Barriers Act):* The Architectural Barriers Act requires that buildings and facilities receiving federal funding assistance after September 1969 be accessible to and usable by individuals with disabilities.
- *Age Discrimination Act of 1975 (Age Discrimination Act):* The Age Discrimination Act prohibits programs or activities that receive federal funding from discriminating against individuals based on age, unless federal, state, or local laws permit such discrimination.
- *Title IX of the Education Amendments Act of 1972 (Title IX)***:** Title IX prohibits educational programs or activities that receive federal funding or financial assistance from discriminating against individuals based on sex.
- In addition to federal fair housing laws that ensure equal access to housing, several presidential executive orders have been issued to reduce discrimination and barriers to obtaining housing.
- In 1988, "disability" and "familial status" (the presence or expected presence of children under 18 in a household) were added as protected classes, further codified in the Americans with Disabilities Act of 1990. In certain situations, the law allows limited exceptions for discrimination based on sex, religion, or familial status.

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Appendix B: Community Outreach

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