San Bernardino Countywide Plan

Housing Element Technical Report

REPORT USE AND INTENT

This Technical Report is an extension of the Housing Element in the Policy Plan. The main body of the Policy Plan contains the Housing Element's purpose, principles, goals, and policies. This report contains the balance of information, analysis, and programs required by state law.

The following draft is provided for HCD review after incorporating changes in response to HCD's comment letter dated February 7, 2022, and in response to comments and questions from the general public received during the two-week public review period between May 22 and June 6, 2022. Changes from the November 2021 version are shown as tracked changes, with new text shown in blue underline and deleted text shown in red strikethrough.

Public Review Draft ~~November 2021~~June 2022

Prepared by:

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1. INTRODUCTION

1.1 PURPOSE

An adequate supply of quality and affordable housing is fundamental to the economic and social well-being of the county. California cities and counties are required by state law to prepare a housing element to address existing local housing needs and an assigned share of the region's housing growth in eight-year cycles. State law also requires that the cities and counties identify and analyze existing and projected housing needs and prepare a series of goals, policies, and quantified objectives, financial resources, and programs to further the development, improvement, and preservation of housing.

The County of San Bernardino's 2021–2029 Housing Element contains goals, policies, and programs to address the state law requirements and the needs of our unincorporated communities. The County of San Bernardino also provides housing services to the entire county through the Housing Authority and Community Development & Housing Agency.

The Housing Element's list of policies and programs guides County decision making for the state-designated eight-year planning period: October 15, 2021, through October 15, 2029. These policies and programs are based on a comprehensive evaluation of existing housing programs and policies; an analysis of the City's population, economy, and housing characteristics; an assessment of fair housing issues; and a discussion of the physical and regulatory resources and constraints for housing production.

The Housing Element has been designed to address key housing issues in the County. These issues include the provision of a mix and balance of housing types and costs to meet the needs of all segments of the community while enhancing and preserving the character of our communities, the provision of affordable housing for special needs groups, the promotion of fair housing for all residents, and the maintenance of the existing affordable housing stock.

1.2 GENERAL PLAN CONSISTENCY

State law requires that "the general plan and elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies." The purpose of requiring internal consistency is to avoid policy conflict and provide a clear policy guide for the future maintenance, improvement, and development of housing within the unincorporated county.

The County completed an update to its Policy Plan (October 2020), shortly before embarking on the update of its Housing Element. The Policy Plan update included policies that address topics such as complete streets requirements, environmental justice policies and actions, flood hazards and management, and climate adaptation and resiliency. All elements of the County Policy Plan (which serves as its "general plan") have been reviewed for consistency in coordination with this Housing Element update, and the County will continue to maintain consistency within the entire Policy Plan.

~~1.2~~1.3 PUBLIC OUTREACH

Public comments and input obtained from outreach conducted between 2019 and 2022 (35 public meetings, 22 stakeholder interviews, and community surveys) were analyzed to identify housing needs, homeless needs, and fair housing needs. In early 2021, the County met with HCD staff and confirmed that the County could consider outreach efforts conducted in 2019 and 2020 as part of the Consolidated Plan and Analysis of Impediments to Fair Housing Choice to the to be public outreach for the Housing Element considering the recent nature of the outreach and the direct overlap between the topics addressed by the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, and Housing Element. HCD directed the County to conduct additional outreach to invite public comment and review of draft versions of the element and to conduct additional outreach as warranted on individual topics and/or geographies.

The County distributed announcements of the County's intent to update its Housing Element in March 2021 through its govDelivery citizen communication system and by contacting the following community organizations: Bloomington Municipal Advisory Council (MAC), Crest Forest MAC, Helendale Community Service District, Homestead Valley Community Council, Lake Arrowhead MAC, Lucerne Valley Economic Development Association, Mentone Area Community Association, Morongo Basin MAC, Phelan/Pinon Hills Community Services District, and Newberry Springs Economic Development Association. These organizations hold regularly scheduled meetings and were considered options to effectively raise awareness and reach residents throughout the unincorporated county. While none of these organizations opted for the County to conduct an in-person organization, all received a fact sheet, Housing Element FAQs, and PowerPoint presentation for distribution at future meetings, with the material summarizing the Housing Element update and ways for residents to provide input. This information was also made available on the County's website, including a dedicated page for the Housing Element, Consolidated Plan, and Analysis of Impediments to Fair Housing Choice. A presentation was also advertised and conducted at a Planning Commission informational workshop on September 9, 2021

The County conducted additional outreach in 2021 as part of the Homeless Point-in-Time Count, Homeless Strategic Plan, and Short-term Rentals Ordinance. These efforts are described in more detail below.

~~1.2.1~~1.3.1 SUMMARY OF COMMUNITY INPUT

~~Public comments and input obtained from outreach conducted between 2019 and 2021 (35 public meetings, 22 stakeholder interviews, and 300 community surveys) were analyzed to identify housing needs, homeless needs, and fair housing needs.~~ The top housing needs were affordable housing, senior housing, and grants to improve current housing conditions. The top homeless needs were resources to support self-sufficiency, such as mental health, behavioral health, and drug and alcohol abuse, permanent supportive housing, and accessibility to homeless shelters. The top fair housing needs were housing accessible to people with disabilities, including ongoing support services, affordable housing for individuals, families, and seniors, and addressing negativity towards affordable housing. Figure 1-1

illustrates the ongoing conversation the County conducts with the community and stakeholders on long term planning and housing issues, needs, and solutions. Table 1-1 breaks down the types and prevalence of housing needs, homeless needs, and fair housing needs identified by community members.

Figure 1-1 Outreach Timeline

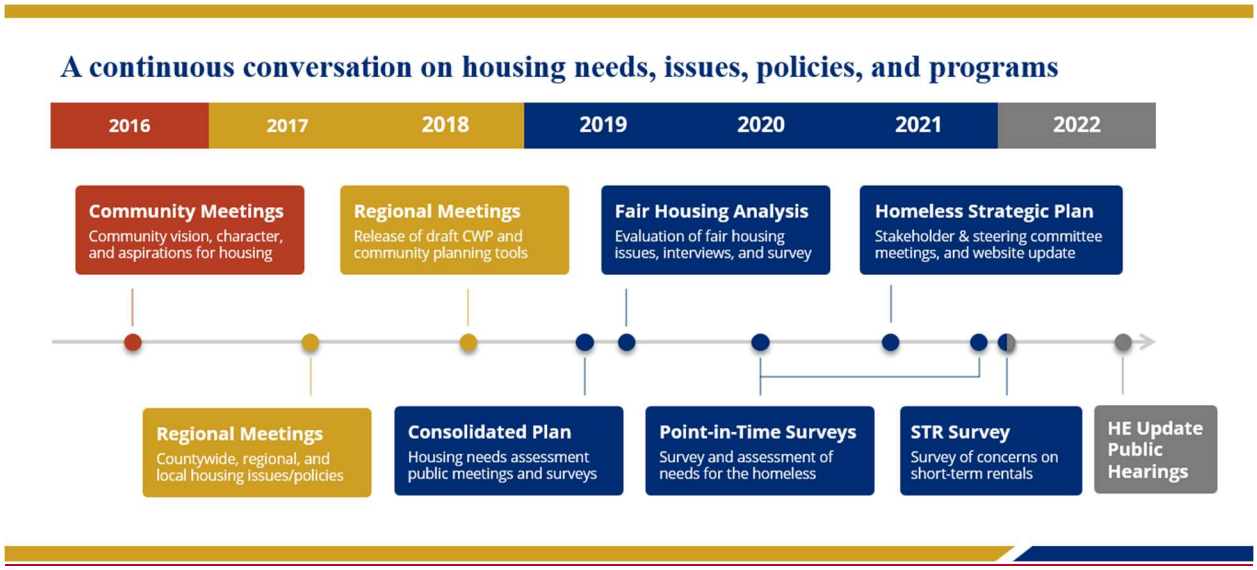

Table 1-1 Summary of Housing Issues Identified in Public Outreach

% of Responses	Housing Issue
Housing Needs	
20%	Affordable Rental Housing
16%	Senior Housing
16%	Grants to improve current housing conditions
12%	Incentives for affordable housing developers
10%	Family housing
10%	Section 8 housing
6%	Homeownership
4%	Housing for people w/disabilities
4%	Integrating special populations
2%	Energy efficiency improvements
Homeless Needs	
25%	Resources to support self sufficiency
18%	Permanent supportive housing
18%	Accessibility to homeless shelters
14%	Homeless prevention
11%	Rapid rehousing
11%	Street outreach
4%	Needs assessment

1. Introduction

Table 1-1 Summary of Housing Issues Identified in Public Outreach

% of Responses	Housing Issue
Fair Housing Needs	
25%	Housing accessible to people w/disabilities
17%	Affordable housing for individuals, families, and seniors
11%	Addressing negativity toward affordable housing
8%	Addressing residential displacement
8%	Permitting of alternative housing (i.e., ADUs, granny flats)
8%	Addressing restrictions on living in and selling mobile homes
6%	Access to jobs, transit, public resources
6%	Control short-term rentals
6%	Family housing
6%	Financial literacy

From the lengthy listing of needs presented in the community engagement overview, a summary of significant needs has been distilled for presentation in this section. The comments summarized here are not listed in priority order, as they were not provided in a manner in which accurate tabulations could be performed.

Housing Needs

- Affordable rental housing, including multifamily
- Affordable homeownership opportunities
- Affordable senior housing
- Affordable housing for a variety of family sizes
- Housing affordable to people with very low incomes (30% AMI and below)
- Housing accessible to people with disabilities, with supportive services
- Section 8
- Housing rehab for elderly residents
- Incentives for the development of affordable housing
- Housing with supportive services, including case management services, medical, mental health, childcare
- Housing with supportive services for people transitioning from homelessness
- Energy efficiency improvements to current housing
- Family housing
- Grants to improve affordable rental housing/ apartments
- Integrating special populations, including aging, homeless, special needs, and mental health into housing plans for the region

Homeless Needs

- Homelessness prevention
- Rapid rehousing
- Facilities for people experiencing homelessness to access services and receive shelter
- Affordable housing with supportive services for people transitioning from homelessness
- Street outreach to homeless persons
- Permanent housing
- Accessibility to homeless shelters
- Mental health and substance abuse services
- Shelters and housing for homeless and people with substance abuse and mental health issues
- Crisis walk-in centers for mental health
- Resources to support self sufficiency
- Needs assessment focused on homelessness in the county

Fair Housing Needs

- Affordable housing for individuals, families, and seniors
- Addressing displacement of residents due to rising housing costs
- Access to jobs
- Housing accessible to people with disabilities, with supportive services
- Permitting of alternative housing options, including ADUs and granny flats
- Controlling short-term rentals to increase affordable long-term rentals
- Access to transportation
- Access to grocery stores
- Access to parks and trails
- Access to quality roads and sidewalks
- Access to property maintenance
- Housing for families with children
- Addressing restrictions on living in and selling mobile homes in some areas
- Financial literacy
- Addressing negativity toward affordable housing and transit in areas of opportunity

Note: this outreach summary includes issues or programs that occur or are the responsibility of an incorporated jurisdiction. This input is retained to inform potential issues in unincorporated spheres of influence and issues that are countywide in nature.

1. Introduction

~~1.2.2~~1.3.2 CONSOLIDATED PLAN AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

In 2019, the County conducted a survey, hosted public meetings, and interviewed stakeholders to inform unincorporated and incorporated communities and gather input regarding fair and affordable housing conditions, perceptions, and needs. The following sections summarize the results and input obtained during community outreach efforts.

Public Meetings

The County hosted 20 public meetings to inform the community about and gather information for the Consolidated Plan and Analysis of Impediments to Fair Housing Choice (AI). Each meeting began with a short presentation providing an overview of the Consolidated Plan and related grant programs followed by an interactive discussion of housing, community development, and homelessness needs. A second presentation was then delivered on the Al followed by a facilitated discussion regarding fair housing, neighborhood conditions, and community resources in the county. A total of 177 members of the public attended one of the 20 meetings, hosted in July 2019 throughout different areas of the County.

Below is a summary of greatest housing needs and fair housing issues identified by participants in both incorporated and unincorporated communities. The feedback from incorporated communities is retained to provide insight into the issues that surround the unincorporated communities.

Adelanto

Greatest Needs

- Housing affordable to In-Home Supportive Services (IHSS) workers. Housing costs account for about 68% of IHSS workers' income before taxes.
- Housing for veterans and IHSS workers should be prioritized.
- Health insurance for IHSS workers; they are not paid enough to afford insurance; healthcare/clinics.
- Senior population is expected to double by 2030; need for home care workers will grow as well.
- Care workers also need to care for their own families.
- Community center open to everyone, offering nutrition, physical activities, groceries.
- Homeless housing and services, rapid rehousing, permanent supportive housing, housing
- vouchers - there is no affordable housing so there are many needs.
- Eviction prevention.
- Adelanto is 51% Hispanic, 31% Black and has no grocery store or sidewalks. The grocery store takes 3 hours to get to by bus, and people can only take 2 bags.

Fair Housing Issues

- People are afraid to access housing and homeless services for fear of U.S. Immigration and

- Customs Enforcement. People do not know what housing and homeless services may be available to them without documentation.
- There is housing discrimination based on race and ethnicity, including in HUD housing.
- Inland Fair Housing and Mediation Board (IFHMB) is a resource but they work with landlords and do not provide help against evictions.

Barstow

Greatest Needs

- Violent crime in the Barstow area is highest outside of Colton and the City of San Bernardino according to the Community Vital Signs report.
- Homelessness is a huge issue in the area. Homeless outreach counted 62 people in Barstow in the Point in Time count. There are tent cities in the area.
- The city doesn't have an emergency shelter anymore but has nonprofits working together.
- An emergency shelter was funded by HUD before 2010 but no longer exists. Emergency shelter funds have not been coming to the High Desert.
- A facility for people experiencing homelessness is needed in the city's human service zone.
- Affordable housing is needed. Hotels filled with long-term residents because of high housing costs.
- Area has a high potential for tourism, but Main Street is full of crime.
- A facility for mentally ill / homeless with warming/cooling center that is not on Main Street.
- The area has not prioritized addressing homelessness with existing funds.
- Homeless individuals are being sent to Barstow from other cities.
- People are attracted to Barstow because of the low housing prices. Vouchers buy more in Barstow.
- The need for affordable housing is driven by people moving into the area.
- There is gentrification of the area from Los Angeles. Victorville and Adelanto also have a lack of housing stock to meet needs of people pushed out of the valley.
- There is a need to support cities to provide incentives to affordable housing developers.
- People experiencing homelessness don't have access to financial services.
- Need to simplify grant funding process. Need workshops for nonprofits.
- Need higher levels of collaboration with county.
- Need housing for middle class, working people.
- Need incentives for housing development, but the city doesn't have the revenues to have incentives. The city already has very low permit fees.
- There is a need for a crisis walk-in center for mental health. Currently there is one open 2 days per week. There is a need for prescription services.

- Need to expand clubhouse to include homeless services.
- Need landlords to rent houses with supportive services in homes.
- Drugs and alcohol, meth, need supportive services treatment.

Fair Housing Issues

- Riverside Drive, a primarily African American community, has high levels of blight.
- Crestline school is in a project, not a mixed community.
- At least 80% of people in domestic violence program put in an application for housing assistance.
- Families with vouchers pay much lower rents.

Big Bear Lake

Greatest Needs

- Facility improvements to improve handicapped accessibility, particularly for businesses.
- Affordable, long-term housing. Short-term rentals (i.e., Airbnb properties) are fixed-up and well kept but long-term rentals are often poor quality and may not be code compliant.
- Housing for seasonal resort workers. A single-room occupancy property may be an option for seasonal workers.
- Activities and services for children and families who are homeless; subsidized childcare.
- Economic development, particularly education programs and jobs that would enable youth/young adults to stay within the community (ex: hospitality management program).
- Internet service is generally available but can be spotty/not high quality; there is one provider available.
- Transit improvements such as new bus stops, improving handicapped accessibility, building shelters.
- Opportunities to improve healthcare access; if you need a specialist, you have to go down the hill.

Fair Housing Issues

- Altitude and weather can be physical barriers to living here. It can be more difficult to get around and tends to be auto-centric.
- The availability of housing that is modern and wheelchair-accessible is limited. People move down the hill to find bigger homes.
- Apartments that tend to be smaller/have fewer bedrooms could be a barrier for families.
- Additionally, if support networks are down the hill, transportation and travel time could be a barrier.
- No resources here for people who are homeless. Other public service agencies may include Big Bear Lake in their service area, but you have to go down to the valley to access resources.

- Old subdivision covenants restricted home sales based on race; these are not in use anymore and the homeowners' associations that put them in place are defunct.
- Inland Fair Housing and Mediation Board handles fair housing complaints.
- Resource levels are based on year-round population numbers, which do not reflect seasonal residents, employees, and visitors.

Bloomington

Greatest Needs

- Housing affordability; there is a long wait time locally (up to 5 years) and people may leave the area before being able to (or because they are unable to) access resources.
- People are often making choices between rent and food.
- Housing conditions are an issue in south Bloomington, particularly areas with mobile homes.
- More housing stock; there is a shortage of units of all types.
- Resources for people who are homeless. Point-in-Time count shows a dramatic increase in homelessness in Bloomington, but there is no shelter here. Closest shelters are in the City of San
- Bernardino or Riverside, but transportation to get there can be difficult. There are no resources to help people in emergency situations.
- Sewers are the biggest infrastructure need. To increase housing stock, sewer needs to be expanded so homes could be built on lots smaller than one-half acre.
- Sidewalks, particularly wider sidewalks to healthcare resources, so people can walk in groups, with strollers, etc. South Bloomington does not have sidewalks at all.
- Public safety and air quality concerns.
- Bloomington is the largest unincorporated community and has needs that a city would have without the same resources.
- Compact housing to keep costs down and respond to lifestyle/market changes.
- Partnerships between healthcare providers and affordable housing developers.
- Recreation opportunities especially for young families.

Fair Housing Issues

- Housing affordability is the biggest fair housing issue. There's a stigma around "affordable" housing and "NIMBY" (Not In My Backyard) attitudes toward it.
- Rancho Cucamonga and other cities in the valley generally have best access to opportunity.
- People in Bloomington have very little, but are looking for similar things (healthcare, schools, transportation). Multiple families may live together to be near a good school.
- The concept of the American dream and the opportunities associated with it have changed. For some people, the focus is just on finding somewhere you can afford to live.

1. Introduction

- Housing discrimination related to national origin and immigration status happens. Families who are undocumented are fearful in general.
- Discrimination happens and people don't know what to do or that there is something they can do.
- Fair housing information needs to reach the community.
- There is a need for better information for people who are undocumented and a need for different approaches to reach that audience. People from within the community should be recruited and trained about fair housing.

Colton

Greatest Needs

- Colton funds a homeless coordinator, which is an important service to continue.
- Senior programming is needed.
- The city has great community services programs.
- Sidewalks are needed to increase connectivity and pedestrian safety. Handicapped accessibility, curb/gutter, and drainage projects also needed.
- Connections to the Santa Ana Trail will be important for future growth and wellbeing in the city.
- Upgrades for bus stops and shelters.
- Opportunities to piggyback on Safe Routes to School programming to further enhance local connections.
- Mental health service is the biggest issue for resolving homelessness.
- City has interest in additional Section 8 opportunities. Redevelopment of existing apartment complexes to offer Section 8 rental opportunities or transitional housing with onsite services would be a good idea.
- Developer interest in local projects is limited.
- Need housing options for veterans, people with mental health/substance abuse issues, or Alzheimer's disease.
- Housing rehab programs for elderly residents are needed.
- There are people living in mobile home parks that are in poor condition, and non-profit organizations have determined they need too much work to be feasibly rehabbed.
- Exterior enhancements - painting, landscaping, facade improvements would be helpful.
- Several possible demolition projects would be viable if there were a source of funding for them.

Fair Housing Issues

- If households have similar financial resources, they will have similar housing options, without regard for their protected class status.
- ADUs, granny flats make it easier to live affordable, but not always permitted.

- Households with people with disabilities may have more limited options.
- The City's allocation of public resources depends on the volume of calls. The condition of facilities throughout community is relatively even, and locations evenly distributed throughout city.
- Colton has a shortage of park space based on its population.

El Mirage

Greatest Needs

- Cleanup of illegal dumping is needed, including tires and pollutants.
- A cooling center for seniors/ youth is needed, including an air conditioner for the cooling center (may be located in existing community center).
- A freezer for the community center is needed.
- Lights for volleyball court are needed.
- El Mirage doesn't have temporary homeless encampments, but there are places where people live permanently. People get campers, build shelters, and no one bothers them.
- Health check-ins for seniors and children are needed.

Fair Housing Issues

- There are rules about mobile homes that they must be more than 700 square feet and can't be more than 10 years old.

Grand Terrace

Greatest Needs

- Sidewalks, particularly on Michigan Street and near schools, and streetlighting.
- Handicapped accessibility improvements, including accessible play equipment in parks.
- Bus route expansion from Grand Terrace to the Veterans Administration hospital in Loma Linda.
- Senior needs, including nutrition program, accessibility improvements to doors of senior building, awning for senior center bus stop, and home repair/systems maintenance for seniors.
- Homeless services.
- Affordable multifamily housing; needed but does not attract developer interest.
- Area is generally built-out in terms of residential development limiting opportunities for new housing development to infill consisting primarily of detached single-family home types.

Fair Housing Issues

- Factors that people consider when looking for somewhere to live include opportunities listed by HUD plus parks and recreation, shopping and food access, libraries, public arts and entertainment, and community activities.

- Demographics may influence your housing choices. For example, households with children may prioritize schools and safety over being near commercial areas. Seniors would have different priorities as well.
- Landlord-tenant issues are referred to Inland Fair Housing and Mediation Board; requests for rental assistance are referred to 2-1-1 or the housing authority.
- There may be some fear of retaliation that inhibits people from reporting housing discrimination.
- Gentrification may be an issue in some cities. There have been instances where previously subsidized housing's affordability period expires, and units are upgraded and become market rate.

Highland

Greatest Needs

- Seniors and homeless needs are high priorities. The city needs daily services for seniors, including home visitation, transportation, medical visits, and social activities.
- For youth, after school programs, nutrition, recreation are needs.
- Road improvements are a need in the area.
- Active transportation is a priority, including encouraging walking and biking. There is a need for trails and road infrastructure that makes active transportation feasible.
- Half of kids travel to Redlands for high school, but there is almost no safe way there on foot or bike. Everyone drives. Safe routes to school and sidewalks to access schools are a priority.
- Infrastructure improvements are needed. Highland is a commuter community where residents travel out to work in the City of San Bernardino, Riverside, etc. Infrastructure is needed for people to easily travel to work.
- Affordable senior units have been difficult to pencil out.
- The area is open to multifamily development, but projects that don't fit with the fire contract can't be approved.
- Homelessness is a huge issue based on the Point in Time Count.
- People experiencing homelessness sleep under bridges, in brush on north end, in homeless encampments, and inside vacant houses.
- Homeless may not be willing to go to the shelter on G street because don't feel safe. Only 2 of 20 surveyed would be willing to go to shelter.
- Drugs and mental illness are important issues to be addressed. Council trying to hire staff to address on daily basis. Mental health and drug addiction services, and safes places to go are needed.

Fair Housing Issues

- More desirable areas in Highland do not have multifamily.
- Not sure if single family landlord would discriminate.

- Majority of funding is spent improving what was done before the city was incorporated.

Hinkley

Greatest Needs

- Squatting in vacant housing is an issue.
- Residents feed community members in the senior center.
- There is a need for outreach to the homeless population.
- There is a need for senior services and programming at senior center.
- People in the area need transportation to needed services, such as doctor, grocery.
- The community center is in good condition. The location of the air conditioning filters is an issue
- There is a need for greater access to computers and WiFi.
- The community center used to have senior lunches. Residents would like to start back up the lunches and cooling center.
- There is a need for pickup and delivery of frozen meals and holiday meals to residents in the area.
- With Pacific Gas & Electric (PG&E) contamination, the area has been decimated except for the people who couldn't afford to leave.
- The houses PG&E purchased inside the contamination area have been torn down. There are abandoned houses outside the 1-mile boundary of the contamination.

Fair Housing Issues

- The city has a unique dynamic due to the environmental problems.
- The area has aging housing stock and lack of access to housing.
- 60% of housing has been purchased by PG&E, and much has been destroyed.
- People outside of the plume area have suffered economic impacts.
- It is difficult to sell houses and almost impossible to get a mortgage.
- People still live inside the plume area.
- Mitigation measures for clean water that PG&E committed to by way of the adjudication is expiring (or will be soon), so many of the residents are buying bottled water to have clean water.
- Once PG&E has fulfilled its obligation to operate the filtration systems, the residents will not have access to clean water unless it is bottled which can be costly. The filtration systems cost about $2,000 and last for approximately 5-7 years.

Joshua Tree

Greatest Needs

- Improvements to community centers and parks in unincorporated areas. Grant funds should be available to unincorporated communities rather than having to apply for funding through a city.

- Vacation rental ordinance, particularly in areas with higher levels of tourism. Airbnb and other vacation rentals raise housing costs.
- Housing that will be affordable for lower-income households. There is no developer interest to build this type of housing. Zoning and a general lack of desire by the community for higher densities are also barriers.
- Smaller homes with reduced footprints and accessory dwelling units (ADUs) could be options to help with affordability.
- More low- or no-cost youth programs.
- Employment opportunities for youth and young adults. Economic development and revitalization of the job base is needed. There are assets and opportunities in the community that should be capitalized on.
- Solar energy.
- Economic development assistance for brick and mortar stores.
- Mental health services and drug abuse prevention/treatment efforts are needed.
- Resources for people experiencing homelessness. Even with a day center, there need to be options of places for people to go at night.

Fair Housing Issues

- Joshua Tree is car-dependent; living there is difficult without a car.
- Limited availability of jobs in Joshua Tree is a barrier for people who would want to live there.

Loma Linda

Greatest Needs

- Apartments and single-family homes here are expensive, but there are large employers. Lots of people commute in to work each day.
- Senior housing; money to support new senior housing developments.
- Money to continue making neighborhood improvements and supporting affordable housing.
- ADUs and incentives for creating ADUs may be an affordable housing opportunity.
- Mixed-use development is an opportunity.

Fair Housing Issues

- Transportation, community centers and activities, and medical services are important in housing decisions, in addition to factors identified by HUD. Redlands, Loma Linda, Rancho Cucamonga, and Ontario have good access to opportunity. Housing is expensive in these areas, and transportation may be an issue.
- Loma Linda is diverse; 28% Asian and high share of Seventh-day Adventists.

- There may still be housing discrimination that happens. Also, NIMBY-ism is a challenge to developing affordable housing.
- Aging community is generally well-accommodated; housing accessibility is not something they hear much about.
- People in Loma Linda know their rights and would know where to go if they faced housing discrimination.

Montclair

Greatest Needs

- Water is expensive, some families will have it shut off so they can afford to buy food.
- An exterior improvement program to assist households with converting to low-maintenance landscaping could help conserve water and lower payments.
- Illegal dumping is a problem.
- Code enforcement and graffiti abatement programs have been successful and should be continued. Senior transportation program too.
- Alleys could use better security lighting.
- Montclair could always use more multifamily rental, but there has been diminished interest from Low Income Housing Tax Credit (LIHTC) developers in building in the area.
- Homelessness numbers are increasing; about 20-30 chronically homeless persons counted in Montclair.
- The other side of the homelessness issue is the families at risk. Their utility bills are sharply increasing and rent is "out of control". Homeless prevention and rapid rehousing programs are important.
- The local school district has reported 450 families at risk of homelessness.
- Set Free Ministries has been successful in getting homeless people off the street. They are initially housed at ranches and progress to work homes and then transitional housing. The participants offer services in the community such as yard cleanups in elderly neighborhoods.

Fair Housing Issues

- Discrimination based on familial status surely happens.
- People with disabilities have more problems finding housing because they often need accommodations; may even be excluded from older housing units.
- IFHMB is who to go to with a fair housing problem. They also put on a quarterly workshop. IFHMB does a great job; feedback on their offerings has always been positive.
- The Montclair City Manager does a good job, better than others, at ensuring equal access to resources in the community.

- More should be done to recruit private-sector landlords into the Section 8 program.

Muscoy

Greatest Needs

- Street and sidewalk improvements, especially safe routes to school and handicapped accessibility improvements. CDBG money was used to improve sidewalks around the elementary school, which is a good use of funding.
- Handicapped accessibility on bus routes; routes were moved to streets with sidewalks so stops would be more accessible.
- Homeless resources, including outreach programs. Continued efforts through the San Bernardino County Sheriff's Homeless Outreach and Proactive Enforcement (HOPE) program.
- Mental health services, including for young adults.
- Affordable housing is needed. Even for people with middle/moderate incomes, housing is very difficult to afford.
- Code enforcement is needed. Rental housing is in poor condition, but rents keep going up.
- There is a NIMBY attitude toward apartments. Something like the recent affordable housing development in multi-use property in Bloomington would be welcome here.

Fair Housing Issues

- Accessibility for people with disabilities is a continuing need.
- Overcrowding is an issue.
- People can call the County or Legal Aid if they have a fair housing or landlord/tenant issue. It's hard to get information out to people about fair housing rights.

Needles

Greatest Needs

- The senior center in Needles is 30 years old. It's a nice facility but could be improved. Especially the kitchen and heating, ventilation, and air conditioning system.
- There used to be a resource officer within the school district but lost the position due to budget cuts. Helped improve attendance, reduce truancy, and build positive relationships with students and their families.
- Need drug programs for teens and kids.
- Set Free Church serves the community, including people who are homeless. Would be interested in painting and bathroom renovations if eligible for grant funding.
- Needles' water/sewer system is old and needs improvement. A grant to help fund connections between the City's lines and houses would be helpful.

- Childcare for moderate-income families is a great need. All existing options are family or homebased, no other options in Needles.
- The playgrounds and outdoor facilities need shade coverings - otherwise, not usable in summer.
- There are abandoned buildings that need to be cleaned up.
- The state's Dept of Behavioral Health provides limited transportation to healthcare specialists that accept Medicaid, but short of this transportation program, access is severely limited. May have to travel to Loma Linda /Lake Arrowhead for closest gastroenterologist, neurologist, or psychologist.
- California requires all children to have a dental exam before 1st grade but there are no pediatric dental providers in Needles who do state-compliant exams.
- 10% of Needles' 1,000 students are homeless. Many live in cars but need shelter. Barstow is the closest shelter. There are existing providers that offer clothes and similar resources.
- Huge need for affordable rental housing. Current wait lists are about 6-9 months.
- Needles used to have a courthouse and could hear cases locally, but it has been closed. There is intermittent bus service to Barstow or Victorville for court appearances. Someone would have to travel to Joshua Tree for a restraining order. Reopening the courthouse would require county and state resources. Video conference technology should be explored as an alternative.

Fair Housing Issues

- Needles needs better access to groceries. Currently a SO-minute round-trip to a grocery store.
- Needles needs more affordable housing, but before trying to locate more Section 8 housing in the city, there needs to be some consideration of the existing gaps in mental health and human services that would only be exacerbated with an increase in lower-income residents.
- Landlords will rent to the first person who qualifies; no regard for anyone's background.
- If a fair housing concern was raised, the best referral would be to IFHMB. But it is seldom that an issue is alleged.
- Public investment in local resources is pretty equal. If Council hears of or knows about a need, they will address it.
- Council members all serve citywide, so no particular interest in any one neighborhood over another.
- Anyone can address Council directly at regular City Council meetings.
- The City and School System work well together. The community puts children first.

Twentynine Palms

Greatest Needs

- Housing is unaffordable- an average 2-bedroom rental is $800/month

- Rental application standards are unreasonably high. A minimum 600 credit score is required to rent many units and you have to have income 3x the rent. Eviction history makes it impossible to qualify.
- Yet there are plenty of vacant rentals, often boarded up or abandoned. People without homes sneak in and squat in them.
- There is no homeless shelter in this part of the county. Apple Valley / Hesperia have closest shelters.
- We don't know the true extent of homelessness in this community because it is "controlled" through enforcement.
- There are funds available from the state for homelessness, but Twentynine Palms wouldn't make a declaration of need and so isn't able to access those resources.
- There are organizations that provide food to the hungry, but the issue really isn't about food. The issue is figuring out housing for people who are homeless or cannot afford it.
- Tax credit developers are not as interested in the area. Due to tax code changes, the credits are not as valuable as they used to be.
- Expiring affordability periods for existing affordable options cut into the supply.

Fair Housing Issues

- Families with children would not have the same housing choices as a household without children.
- A military family may be preferred over a family with the same income, but who is employed at Wal mart because they are perceived as more stable.
- Most houses are not wheelchair accessible. Can't get into a bathtub or shower or even down a hall. There's lots of dirt rather than pavement in yards.
- Fair housing complaints or issues would be directed to the Inland Legal Services, the Landlord Mediation Board, or the American Civil Liberties Union.
- Twentynine Palms has nice parks. The City does a good job offering places for kids to stay active.
- The Utah Trail area has seen a lot of investment.

Yucaipa

Greatest Needs

- Housing is a need but the community is generally not receptive to apartments other than senior housing.
- Huge need for affordable senior housing; mobile home parks are 30-40% seniors.
- Issues related to housing condition/quality, particularly for rental units and mobile home parks.
- There are opportunities to improve mobile home parks/ convert them to other types of housing but there is no incentive for mobile home park owners to do that. There are also concerns about where existing residents could live during conversion.

- Mixed-income retirement community recently built on Yucaipa Boulevard was a good example of affordable housing development.
- Apartment housing is needed for young adults/ adult children of Yucaipa residents; would be more affordable than single-family homeownership.
- Curb, gutter, and sidewalk improvements, including handicapped accessibility improvements.
- Strong community support for sidewalks and bus stops, particularly as demographics change and there are fewer people looking for rural living.
- Recreation opportunities for youth and seniors.
- Literacy programs at the library.
- OmniTrans provides transit service but people still have transportation challenges. Possible partnerships with Uber or Lyft to assist seniors get to medical services.

Fair Housing Issues

- Racial and ethnic composition in Yucaipa is pretty uniform throughout the city.
- Housing issues stem from the lack of quantity/supply at all price levels.
- Anyone with a housing complaint would be referred to the County or IFHMB.

Yucca Valley

Greatest Needs

- Housing for people experiencing homelessness is needed. There are many homeless individuals in the area, with many people living in vehicles and with pets.
- People are moving to the area because they think the housing is affordable.
- Need housing for people who can't afford it, people are in need of $500 or $400 or less rents.
- There is a 500-unit housing shortage. Landlords are asking for 3 times income to take applicants.
- There are not many long-term rentals anymore; they have mostly been converted to short-term.
- Existing long-term rentals are priced high.
- People take properties off market and convert to short-term rentals. A weekend stay in a short-term rental costs as much as people in the area would pay for a month of housing.
- Families are doubling up, moving into homes together, or living in multigenerational homes.
- There are many elderly residents without caregivers who have housing or repair needs. The affordable senior housing project that was built is full.
- Houses on the market often lead to a bidding war up to 2 or 3 times the home value, and owners can double or triple what they paid.
- There is not a lot of private development of multi-unit properties. Land is cheaper here than anywhere else, but no one would work with the developers to get it done.

- Water problem is why they don't develop more, not enough water, new development would use too much.
- Yucca Valley and Twentynine Palms didn't declare a shelter crisis, so access to state funds is restricted.
- Drug abuse is a problem.

Fair Housing Issues

- Different family households of same income would have same housing options.
- Not sure about discrimination based on disability. It may be harder for people with disabilities to find accessible properties.
- Regarding discrimination, people could contact IFHMB, legal services, or the 2-1-1 number for homelessness and affordable housing.
- Many roads are not paved.
- Pleased with provision of resources in the town; town is trying to reach all with limited resources.
- Same areas that need help were denied because the area wasn't in the jurisdiction.
- Code enforcement gets addressed pretty quickly.
- Mobile home situation: most parks have a 55+ age restriction and people have to make $1,500 per month per person living in the home. People aren't allowed to pass on their mobile homes, they have to sell them.

Stakeholder Interviews

Interview invitations were made to more than 60 representatives, of whom 20 participated in interviews. Several invitees participated in other manners, such as by attending a public meeting or completing a survey. Organizations from which one or more representatives participated in the stakeholder consultation process for the Consolidation Plan and AI include:

- Housing Authority of San Bernardino
- Inland Fair Housing and Mediation Board
- San Bernardino Department of Behavioral Health
- San Bernardino Council of Governments
- San Bernardino County Planning
- The Center for Individual Development (City of San Bernardino)
- San Bernardino County Third District
- City of Chino
- City of Ontario
- City of San Bernardino

- Town of Apple Valley
- Los Angeles County Development Authority
- Inland Regional Center
- First 5 San Bernardino
- Catholic Charities San Bernardino/ Riverside
- Knowledge and Education for Your Success (KEYS)
- Time for Change Foundation
- Jamboree Housing Corp

Below is a summary of responses provided by stakeholders during the interview process.

1) What do you believe are the area's greatest community development needs (e.g., job training, homeless prevention, parks/playgrounds, youth activities, senior centers, sidewalks, etc.)?

- Safe and decent affordable housing. There is a shortage of housing for the region. By safe, meaning families safely live and play there. First and last month's rent may be 2x or 3x what a person with good credit would pay. Families call service providers to help with rent. A lot of people double up. There is plenty of development of single-family housing for moderate income level and above.
- Americans with Disabilities Act (ADA) compliant housing. When there is an affordable housing project, it needs to be ADA compliant.
- In unincorporated areas, the greatest needs include sidewalks, lighting, streets, parks and addressing blighted vacant commercial.
- Workforce development. Rapid rehousing is short term. There is a need to get people connected on the front end.
- Infrastructure. They are working on Ontario Ranch to double size in Ontario. Ontario Ranch is converting land from farmland to housing; putting in roads, sidewalks, water lines. The city is aging so infrastructure needs to be updated. Need for streetlights and sidewalks.
- Countywide, homelessness is a huge issue that impacts quality of life of residents and how people view the county. People are more hesitant to buy in the area because of homelessness, so it impacts economic development. There are large homeless encampments.
- In High Desert, residents are averse to shelter facilities because they think homeless will come to the area. Mountain areas have some homeless population, but resources are not located in the mountains. People have to go to the city of San Bernardino to get services but don't want to leave the mountains.
- Outreach to people experiencing homelessness is important. People have communities and social support in homeless encampments.

1. Introduction

- There is a need for resources for people to become self-sufficient.
- It would be helpful for the county to coordinate more with cities with resources. The county should get city perspectives when doing projects in cities to avoid wasting resources. Economic and community development need to be coordinated. There are a lot of initiatives across the county but need to be more coordinated with the cities. Needs also include non-conflicting policies from the state.
- There is a need to coordinate housing efforts with economic development efforts. Need to figure out an economic development strategy in areas where there aren't jobs.
- Senior services are a need. Have seen from Point-In-Time counts, a growing portion of homeless population is the elderly. Seniors may be left behind by technology, not able to find housing in newspaper. There is a need for senior navigation services for housing and dealing with issues relating to dementia.
- Job creation is a great need. The workforce is commuting out to LA and other areas, traveling many hours. The county needs jobs that pay equally to the jobs people are commuting out for.
- There is a need for affordable childcare in order for low-income individuals to work or go to school. Childcare is a barrier. Half of families the housing authority serves are career a bled. They serve many single parent households in which childcare is a barrier to obtaining employment.
- In community development plans, childcare is a need. There are resources, but they are limited and there are wait lists.
- Transportation is an issue. There are well-paying construction jobs, but many housing authority families are unable to attain them because of lack of transportation.
- Clients use dial-a-ride. It is expensive. They also have a fixed route. They need stops near where the clients live.
- Cultural opportunities, including arts, parks, community centers, and libraries, are needs.
- Everything is spread out, so libraries and community services may be difficult to access.
- There is a need more recreation, rebuilding parks, something to be prideful of in the city of San Bernardino. Most existing parks have safety concerns, homelessness, dead landscaping, outdated playground equipment. Libraries, neighborhoods need to be safe. People with disabilities getting to work need to feel safe.
- Community centers that offer a variety of programming (e.g., lunch programs, daycare programs, arts programs, classes for children and adults, tax programs) are needed. What the infrastructure is around the community that people can access matters.

2) What types of housing needs are greatest in the community (e.g., workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?

- Affordable housing is a big need, particularly for people who are homeless and the working poor. People have to rent in substandard housing. There is a lack affordable housing in general, including apartment buildings, affordable homes, and bridge housing to get people off the street. People are trying to work in the city they live in, but prices don't match the pay. There is a need for both rental and homeownership opportunities. Renting a home can cost the same as a mortgage. There is an excess of 68,000 on waiting lists for the housing authority, and many waiting lists are closed. There is a need for housing to fit the incomes of people in the county, including those living on public benefit and disability/551 and workers living on $1,000 or less per month. Access and location of housing is important.
- There are landlords that will say that there are too many people, even if there are 2-3 bedrooms.
- Within new housing developments there should be case management services, pediatricians, child mental health services to serve 0-5 years old and other items related to the social determinants of health.
- Housing focused on people transitioning out of prison is a need. There is no opportunity for a parolee or probationer to become a good citizen if we do not provide housing and income. Reentry housing for people with substance abuse problems who have burned bridges with family.
- Individual cities may not get a lot of funds focused on affordable housing, and those programs require a lot of funds. Development is slow because cities aren't sure how to tap into county funds to serve their interests. Disconnect between county and cities lowers production of housing. Housing administrators should articulate a process by which cities know what to expect with regard to getting funding.
- In mountain area and High Desert area, there is an influx of vacation home rentals flooding the market. Long term rentals are gone. Need to limit the number of short-term rentals.
- There is a need for the ability to transition some affordable rental housing to homeownership opportunities. Many people can't buy a home because their credit isn't there.
- Workforce housing is very important in the county, in an affordable range for logistics workers.
- Amazon has four facilities in the city. Reach out to corporations like Amazon to discuss creating a stable workforce, and what corporations can contribute to workforce housing. Workforce housing is also very limited for people working at resorts.
- Multifamily housing is needed more than single family.
- Housing for people with disabilities that is near supportive services is needed.
- A lot in the county aren't well off and can't afford to rehab their homes. This would help them stay at home. City of San Bernardino has old housing stock, so rehab is important.
- In a region as widely distributed as San Bernardino County, there is a large homeless population needing to be housed. It is rare to get a homeless person in their office that doesn't have income, people working at $13-$15 per hour can easily become homeless. Transitioning homeless people into housing is a need. Permanent supportive housing for homeless is needed.

1. Introduction

- There is a need for more programs for men that provide long-term support. Most programs are 30-, 60-, 90-day programs, but people need long term support.
- Homelessness should be integrated in a housing plan for the region because there is a lack of funding to address homelessness. Special populations, aging, homeless, special needs, mental health, must be included in a plan with a development strategy
- Have found success where city staff and councils are open to having affordable housing in the area, need funding, permitting, community to be accepting.

3) How big an issue is homelessness in your community? What does homelessness look like? What steps could be taken to address needs related to homelessness?

- Homelessness is a huge issue in the county. Homelessness has increased from previous years. It is growing. On the ground it doesn't look like it has changed much at all. It is a multi-diagnosis issue. The homeless population is scattered across the region. People are living in parks, on the street, under tarps, in vehicles and parking lots. The schools are identifying people are living in motels and those who are doubling up. A few have animals. Many homeless individuals have health conditions. They don't bother anyone. Families who are just homeless are easiest to help. Language barriers, mental health, and addiction present additional challenges.
- You don't always see homelessness. There are a lot of working poor families that if they miss rent they are homeless. Many will have 2-3 families in one apartment.
- San Bernardino Office of Homeless Services conduct annual Point-In-Time (PIT) count. 2,600 homeless were counted in the most recent count. How accurate is the count?
- We see that resources are directed in a certain population. In past recent years, the Federal government wanted to end veteran homelessness or women's homelessness. There isn't a wide range of focus.
- Often cities give people vouchers to stay in motels. Cities may have motel ordinances that there can only be four people per motel room, so a family of 9 has to pay for two rooms. City staff go to motels regularly to see how many people are in each motel room because they want a motel tax. If you have someone staying there without a valid California ID, there is an extra 10% fee.
- The bed tax is an issue. Catholic Charities does not have a shelter facility, so they have to use motels to house people. The City and County have budgeted for the motel tax, so they expect to receive a certain amount.
- There is increasing homelessness among the elderly from being dispossessed or losing contact with families. For homeless youth, the county has a Transitional Age Youth program.
- There is a need to build teams for street outreach. Outreach requires multiple contacts, 10 or more to convince people to move into an apartment. City of San Bernardino has a quality of life force that helps the homeless transition out of homelessness, focusing on getting people off of the

streets and build relationships with them. Building relationships and understanding of needs is often overlooked.

- There is a need for homelessness prevention, including more affordable housing and behavioral health services, and substance abuse education. There is a need to provide all of the services that the person needs in order to be housed and be able to afford (rent, buy) a place to live.
- More permanent supportive housing is important. Working with the Continuum of Care, housing first is the priority, including temporary or permanent housing and warming and cooling. There needs to be a clear vision about how supportive units for people transitioning from homelessness can be rolled into other developments so that you get an allocation of units regionally to help address the regionwide problem of homelessness. Permanent supportive housing has to come with supportive service dollars. $3,500 to $7,000 per unit per year has to come along with the units.
- There is prioritization in homeless services. There are not many services available for singles.
- There is a need to look at the data of those to see who are getting rapid rehousing to see who may not be successful in order to make sure they get permanent supportive housing.
- Once people have housing, case management services are needed, including job training, resume services, addressing mental illness, etc. There is a need to focus on job training and ability to assimilate into society-more than just one-offs, continuous services to let people know that it's not one step. Nutrition assistance, medical assistance, job training, and access to education are needed.
- There is a huge correlation between mental illness and drugs. There are many people with both issues. In the past 5-10 years, many drug treatment programs have been shut down. There should be specific housing for people who are severely mentally ill. In the few drug treatment programs that are available, if you are experiencing substance abuse, you have to call a hotline to be assessed. There are inpatient and outpatient services based on need. There is a bigger priority on opioid abuse, but in San Bernardino people are usually on meth or crack. Because they aren't on opioids, they are not getting treatment.
- Strategic plan should identify what goals are for addressing homelessness. The county is in need of a needs assessment regarding homelessness to determine types of housing needed and types of households (veterans, families). There should be goals for development of homeless housing, mentally ill housing, and senior housing in the county, including how many units are needed of each type and how much funding is required so that staff has a number to work toward. There is a need to align funding from behavioral health and workforce housing. There is so much more demand than availability of affordable housing. Communication between cities and county around the issue is important.

4) What recent community development or housing initiatives have been especially successful in the area? What made them successful? How/where can they be replicated?

- The county's project in Bloomington incorporates mental health units, senior housing, library, and park, and daycare. It is a service-rich project.

1. Introduction

- Victorville partnered with the housing authority to rehab an old hotel for housing.
- Phoenix Square, developed in 2012, has had no police calls, and is crime free and drug free. It is a 7-unit bldg. across the street from elementary school, near grocery and bus stops. Tenants take pride in it. Senators and federal government have come to visit. The design is intended to be smaller and community-oriented. Families love living there. It can be replicated if they have support from local government, funding, and land. Elected officials and community have to be supportive. With emergency shelters, communities put up NIMBY (Not In My Backyard) laws. However, they need to take families out of bad environments. Families do take care of the property because the foundation cares.
- Inland Regional Center project is the most successful. To purchase a home and turn it into board and care is not soluble anymore. Smaller businesses do this with 2-3 clients. It's harder for them.
- There is a project in the City of San Bernardino for people with disabilities in which they check their food and schedules.
- In partnership with workforce development department and Loma Linda University, the housing authority established 5-year term limits for non-elderly, non-disabled to take advantage of housing assistance.
- Project -based voucher program needs to be maintained and increased. It is a tool to help finance the projects and helps to increase the rents. Tenants pay no more than 30% of income. Without it, they would receive about $300 per month of $1,000-$1,200 from tenants coming out of homelessness.
- Santa Clara and Los Angeles are two regions that have done a good job of developing a consolidated strategy and addressing obstacles to affordable housing development. They have a system of promoting projects that get funding.
- The County has adopted diversion practices through community plans. They will have an all-county training next month. They will educate communities that are well aware of homelessness so that people will use the same language when talking to people.
- Master Leasing Agreement & Risk Mitigation - Insurance for the landlord. They are there in case there is a hiccup and pay things to keep the family stable. To keep the available housing stock available and keep people in stable housing. Investing in the unit if the person messes it up.
- Funding streams California Emergency Solutions and Housing (CESH), Homeless Housing and Assistance Program (HHAP), Homeless Emergency Aid Program (HEAP). There are some opportunities, but they need to get the county to apply. If they could strengthen those relationships and do gap analysis planning.
- Bloomington is a place for seniors and has a library. Arrowhead Grove, which used to be Waterman. In Irvine they had a distinct plan for building that city. All housing looks alike. It helps to break down those rankings. San Bernardino County is doing a great job with this.

- Seven years ago they constructed 376 units in downtown. $12 million in infrastructure for downtown. They put a senior center in a shopping center. They had strategic growth council grant- $33 million grant to leverage $100 million Housing, OmniTrans (2 new buses), community gardens (organic, reducing food waste, composting), bike lanes, urban canopy, bus shelters, solar - this is in the core of downtown.
- Worked with Step Up on Second in Santa Monica to house chronically homeless, engage over 300 homeless, going out onto streets and meeting people where they area.
- Bond initiatives in California to resource the housing pipeline, targeting housing for different populations, Los Angeles and Santa Clara County now have funding but have nimbyism, interagency rivalries. Projects are difficult to do in smaller towns such as Apple Valley, which are limited in funding. Sometimes projects require more funding than the town receives or would require all of the annual funds.
- None. The city and county would say this is successful, but I do not think so. They have the Waterman Gardens projects where they tore down 300 housing projects. They rebuilt a Phase 1 and moved everyone out. Many of the clients don't think they will get housing again. Part of the thinking is, "those people have been living there too long. They need to move on and let someone else experience low-income housing." I lived in housing projects for 15 years and I sometimes wish I could go back because I can't afford the rent either.

5) What parts of the county (or your city) are generally seen as areas of opportunity (i.e., places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- Areas of opportunity are concentrated in the west end of the county, including Rancho Cucamonga, Fontana, Highland, Rialto, Chino, Chino Hills, Redlands, Colton, Yucaipa, and Upland. These are generally safe, higher income areas with access to good schools, jobs, housing, retail, public transportation, new development, walking trails, and other amenities. They have access to grocery stores, doctors, and healthcare. In particular, the schools in these areas may be of much higher quality. Mixed use developments with high quality design are also desirable. San Bernardino is also a hub, and the city, particularly the northern side, may be a desirable place to live because of access to job opportunities. The High Desert is dense and has a lot of places to live but lacks jobs. Areas where community colleges are located are also desirable places. This includes Victorville, San Bernardino, Cal State San Bernardino, and Loma Linda University. Housing authorities in some of these areas have huge waiting lists.
- Income is a major barrier to living in these areas. People can't afford to move in and don't have a rental subsidy. The landlords want 2-3x income based on rent. Their families pay 80% of monthly income on rent. In the city of San Bernardino someone might pay $1,000 per month for a one bedroom, but in Redlands a one bedroom might be about $2,000. There is a premium on housing that is close to jobs.

- Financial literacy is another barrier. Providing that knowledge to people is important.
- People living in some of the areas of greater opportunity may be opposed to the development of affordable housing or transit in their cities or neighborhoods.
- Commuting and transportation are also barriers. In the High Desert there is less industry, so people have to commute to work in Los Angeles, Orange County and Fullerton. Lot of industrial jobs are opening up in Apple Valley, but Hesperia and Victorville have better freeway access.
- Access to employment is why the western cities are populous.
- Lot size and lifestyle preferences may be a barrier in some areas. People go to the High Desert if they want more acreage.

6) Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- Transportation and traffic are issues. Many people do not have access to vehicles. Lack of access to public transportation may limit housing choices.
- A lack of housing inventory, due in part to the prevalence of short-term rentals in the county, impacts housing choices by restricting long-term rentals.
- The number of bedrooms needed may restrict housing choices for larger families.
- Access to needed services may impact housing choices. Affordable daycare, accessible services and healthcare impact where people can live. These are much less a barrier on the west end.
- Evictions, criminal history, and credit history may impact housing choices.
- Housing choices are based on race and family size. Whites will have a different experience than Hispanics and African Americans. Also, if you have one child vs. two or three children that plays a role. Or if you are Hispanic and African American with teenagers, the teenagers will be seen as trouble. But if you're white they will not. One person sleeps in her car with her children because they are teenagers.
- Credit checks and fees may impact housing choices. Many families have credit issues because of the recession and foreclosure. People with these histories have fees of $50-$200 in addition to rent because they are considered "high risk" and are at a higher risk of eviction again. People looking for housing spend a lot on these credit check fees.
- Family and social networks may impact where people may be willing to move.
- Supportive services available in housing may impact housing choices. Children get bullied at school for having dirty clothes or wearing the same clothes over and over- so, teenagers don't go to school. Hope in the City takes teenagers to the laundromat every Thursday. They wash their clothes because they want them to go to school and graduate. Having a laundromat on site - this all has to do with community development and housing.

- Housing discrimination is common, especially with immigrant families. There are property management companies that rent very substandard housing to immigrants because 1-2 members of the family might not be legal. So, the landlord can report them. Infestations may be horrible.
- People may not be familiar with their rental agreements. In some rental agreements, it says that the landlord can check rental agreements every 6 months, or the renter can't move in until they present renter's insurance (this is another cost, $13-$14 per month). A teenager might have gotten into trouble and might be on probation and the mother gets evicted for not reporting it. This may be in the lease, but people don't read the lease when they are in need of housing.
- Ontario gets disability complaints. This is addressed through education regarding service animals.
- San Bernardino is known for slumlords. There are a lot of empty buildings and apartment buildings. That are not well kept. Owners do not live in the county and do not keep it up. They are not safe or decent, or affordable. Discrimination against people with criminal histories.
- Recidivism - people go back into crime. Evictions or poor credit. If they do quality, they are charged sky-rocket fees.
- Not aware of any discrimination.

7) Are people in the area segregated in where they live? What causes this segregation to occur?

- Segregation has to do with income levels. It comes down to affordability. Where people live it is based on what they can afford. In some newer areas, it costs $800K+ to purchase. In older areas, it costs $400K+ to purchase. There's no new development where you can purchase for $400-500K. Homebuyers are more segregated because of this. Poorer areas are isolated communities of Black, Hispanic, or Asian populations. Wealthier areas are more mixed. It looks like a racial segregation, but income is the primary driver.
- In the Inland Empire and city of San Bernardino, communities seem to be integrated. The High Desert and mountains are mixed and not segregated.
- Families are limited to certain neighborhoods because landlords can pick and choose. They end up in poverty neighborhoods.
- Different groups of people live in different areas of the county. City of San Bernardino is very diverse, with high proportions of Latino and Black population. Crossing into Highland, there are lots of White people who live in the area.
- Most affordable housing going in is in low income neighborhoods. The enclaves are small so you have wealthier communities near low income communities.
- It's pretty mixed but there are some spots - like one area that they call "Little Africa." It's designed that way, especially with redlining. You can see what communities are improving, doing repairs and growing, versus the ones that aren't changing - no banks, no grocery stores, and no gas stations.
- Segregation may be due in part to certain racial and ethnic groups wanting to live close to each other.

1. Introduction

- Segregation is caused by decades on top of decades of systematic racism, including individual and institutional/government discrimination in housing. Some of the subsidized housing programs perpetuated it when putting housing projects in majority minority areas instead of areas of opportunity.
- People may also be segregated by education levels. In the metro valley area, the city of San Bernardino has a larger Hispanic population than Redlands. Redlands is a mini Silicon Valley, employing people in tech, so people have to have education and experience to access the jobs there.
- Regional hate crime data is alarming. There is still hate toward religious groups, Jewish and Muslim, and toward African Americans. People are more outspoken in their views now in discriminating. People may not feel welcome in certain areas in the outskirts of Los Angeles.

8) What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

- Inland Fair Housing Mediation Board (IFHMB) is the main agency in the county; they are a HUD-approved counseling agency. They provide people with landlord tenant mediation and do mediation so people don't lose the place where they are living. They also help people file discrimination complaints.
- There is a fair housing commission, lawyer service (legal aid), and United Way 2-1-1.
- There isn't any law in San Bernardino County for a landlord to discriminate against a Section 8 voucher holder.
- There aren't as many shelters as there could be (e.g., domestic violence, homeless) so there are not enough resources to refer them to.
- The IFHMB will offer mediation, referrals to legal aid. They participate in their trainings and obtain resources. They make sure that the community is updated. They have to go to training annually so they can give families the right information.
- The IFHMB does landlord tenant mediation, senior services - energy rebates, referrals for handymen, Medicare questions. They coordinate well - fair housing workshops throughout the region. In the Transformative Climate Communities grant, the board is a partner. They are building 176 units for 30-60% AMI, acquisition/rehab of 86 units. They will be doing targeted outreach for those communities. Examples of projects are: lmporia Place - privately owned, 1-4 bedroom units & Vista Verde National Core, non-profit owned, 2-3 bedroom units.
- Legal Aid of San Bernardino has been moving more into Fair Housing and housing related issues, and helping people work through evictions with an eviction clinic.
- The American Civil Liberties Union is interested in housing.

- Apple Valley funds Inland Fair Housing and Mediation Board for fair housing. They have a location in Victorville, funded through Hesperia and Victorville. They are quite large and may connect callers with other agencies, including child services, food, and shelter.
- Inland Fair Housing partnered with the housing authorities, James Foundation, and National Association for Community Mediation to educate families participating in housing authority programs about mediation services available.
- IFHMB does put on trainings but I think they are useless. They don't do anything else. If someone goes to them, they try to discourage them or have the tenants mediate on their own because they won't win. Fair housing is severely under-funded, and that could be one of the reasons why. If they don't have the capacity to take 12,000 complaints each year, there's no action. Fair housing needs to be beefed up. They have to keep the funding source happy and do their reports, but there's no impact.
- Five stakeholders were not aware of fair housing services offered in the area.

9) Are public resources (e.g., parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in your community?

- Yes, but it is geography based. The Low Desert does not have internet because it is so spread out.
- Public resources are not evenly distributed but are proportionate to the population.
- All communities have parks and police, but the population is more spread out in the desert area relative to the metro valley. People must wait for deputies to travel the miles.
- Public resources are not evenly distributed. There are not as many service options for people in unincorporated areas. The High Desert, Victorville region is not well-served. Maintenance for streets and sidewalks takes longer.
- The County has a hard time programming and maintaining the parks because it's done through special districts taxing system. County doesn't have a parks department and is lacking in neighborhood recreation.
- Higher income neighborhoods tend to have more amenities and sidewalks, roads. Resources are distributed in areas near community colleges and universities, and pocketed areas.
- Downtown areas don't have that accessibility. Zip codes with less income tend to have less infrastructure.
- The City of San Bernardino isn't great at managing parks compared to Highland and Rialto's parks.
- The city's parks have fallen into disrepair, so they use CDBG dollars on them.
- In mountains and desert there is less access to specialty medical services.
- Yes, they are well distributed. In Ontario there is a good distribution of parks, schools, and community centers. They have some areas where they are working on parks, e.g., downtown.

- They just built Ontario downtown square park.
- There is a fragmented approach between agencies, need to combine behavioral health, housing, etc.

10) Is there anything we haven't discussed that you feel is important to our research?

- There should be more support for a collaboration of providers. I recently received a list of homeless services and half are funded by First 5.
- When you have assistance and receive a subsidy, as soon as the subsidy ends you are back where you started. Also, with the Affordable Care Act, employers are making sure that they don't give you more than 26 hours because then they have to pay benefits. I am against $15/ hour because that means you will just be given fewer hours. People go between 2-3 part time jobs.
- We have people who don't really know what the community needs. They just follow the funding streams. They don't really want to hear from certain people, such as the mom with 4 kids. So we don't get that kind of community engagement.
- Housing authority should make voucher program more available.
- We want to know if there are gaps amongst partners
- There should be a section on the needs of individual cities. There is a need for cities to be at the table.
- Making available and identifying potential sites for affordable housing is important.
- Working with cities to develop affordable housing is important.

Community Survey

The third method of obtaining community input was a 24-question survey available to the general public, including residents and other stakeholders. The survey was available online and in hard copy in English and Spanish from June 16 to September 1, 2019. Paper copies were available at the public meetings, through local service providers, and at the County Department of Community Development and Housing. A total of 302 survey responses were received.

Participants Demographics

- Of the 302 people who participated in the survey, all took the survey in English; there were no responses to the Spanish language version.
- Survey participants live throughout San Bernardino County in a variety of zip codes. The largest numbers of respondents reported living in the Redlands, Joshua Tree, and Twentynine Palms areas, however, 23 total zip codes were represented among the responses including such varied communities as Barstow, Hesperia, Muscoy, Needles, Trana, Victorville, Yucaipa, and others.
- Respondents' ages are relatively evenly distributed. About 20% are between ages 25 and 34; 21 % are 35 to 44; 18% are 55 to 61; and 23% are 62 and over.

- About 46% of survey takers have household incomes under $50,000 and the other 54% have incomes above $50,000.66 participants (22%) have very low household incomes under $25,000 and 83 (28%) have incomes over $700,000.
- A total of 202 survey participants are white (68%) and 58 are Latino/ Hispanic (20%). A total of 28 respondents are multiple races (9%).
- 71 survey respondents (24%) have or live with someone who has a disability.
- Most participants (62%) own their homes, 27% rent, and 5% (15 respondents) live with a relative. 3 respondents (1 %) live in public housing or use a Section 8 voucher.

Housing and Community Resources in San Bernardino County

- When asked to identify housing needs in San Bernardino County, 62% of respondents (171 people) said that there is a high need for elderly or senior housing; another 29% (79 people) identified it as a moderate need. Other popular responses include construction of new affordable rental units, energy efficiency improvements to current housing, family housing, grants to improve affordable rental housing/ apartments, and housing for people with disabilities, all of which were identified as a high need by at least 50% of survey takers and as a moderate need by at about 20-35%.
- When asked about needs related to homelessness, homeless prevention and transitional/supportive housing programs were top selections, identified as a high need by about 83% and 70% of respondents, respectively. Each of the other selections -outreach to homeless persons, permanent housing, and accessibility to homeless shelters- were also identified as a high need by at least two thirds of survey takers, indicating that resources to address homeless are a key need in San Bernardino County.
- Thinking about the availability of community resources in San Bernardino County, 61% of respondents (168 people) report that garbage collection is evenly provided throughout the county. Responses regarding fire protection, schools, banking and lending, and bus services were more evenly divided. Four resources were generally thought of as not being equally provided throughout San Bernardino County: roads and sidewalks (identified as unequally provided by 72%), property maintenance (identified by 67%), grocery stores and other shopping (identified by 58% of participants), and parks and trails (identified by 55%).

Fair Housing in San Bernardino County

- Relatively large shares of survey participants report knowing or somewhat knowing their fair housing rights (53% and 34%, respectively). However, about 14% of people do not know their fair housing rights and three times that number (42%) would not know where to file a fair housing discrimination complaint.
- 41 participants (14%) experienced housing discrimination while living in San Bernardino County, 35 by a landlord or property manager, 7 by a city or county staff person, 7 by a real estate agent, 1 by a mortgage lender, and 6 by others.

- Of the 39 respondents who experienced discrimination, 6 filed a report of it. Reasons for not reporting include not knowing what good it would do, not knowing where to file, fear of retaliation, and not realizing it was against the law.
- Survey participants were asked whether they think housing discrimination is an issue in San Bernardino County. About 35% answered yes and 18% said it was somewhat of an issue. About 22% said no, and the remaining 25% didn't know.
- Asked to select any factors that are barriers to fair housing in San Bernardino County, respondents most commonly identified the following impediments:
  - Not enough affordable housing for individuals (selected by 71 %)
  - Not enough affordable housing for families (selected by 71 % of respondents)
  - Displacement of residents due to rising housing costs (selected by 67%)
  - Not enough affordable housing for seniors (selected by 65%)
  - Limited access to jobs (selected by 64%)

~~1.2.3~~1.3.3 HOMELESS POINT-IN-TIME COUNT

In January 2020, the County led a multi-agency effort to conduct a count to better understand the characteristics and needs of people facing or experiencing homelessness. The San Bernardino County Point-in-Time Homeless Count is a one-day street-based unduplicated count of sheltered and unsheltered individuals to identify how many people in San Bernardino County are homeless on a given day. The Point-in-Time count took place across thousands of square miles in 20 community planning areas on Thursday, January 23, 2020.

There were 3,125 persons who were counted as homeless on January 23, 2020, which is a 19.9% increase since 2019. Nearly three-fourths (72.6%) or 2,270 of the 3,125 homeless adults and children were counted within eight cities that include Barstow, Colton, Fontana, Ontario, Redlands, Rialto, San Bernardino, and Victorville. These eight cities accounted for three-fourths (74.5%) of the total unsheltered population as well as nearly three-fourths (70.2%) of persons counted in shelters and transitional housing.

Of the 3,125 persons counted, 2,390 or more than three-fourths (76.5%) were unsheltered. Of the 3,125 persons counted, 735 persons or nearly a quarter (23.5%) were sheltered. Among the 735 sheltered persons, 537 were counted in shelters or received a motel voucher and 198 were counted in transitional housing programs, including a safe haven program.

~~1.2.4~~1.3.4 HOMELESS STRATEGIC PLAN

As part of the development of the Homeless Strategic Plan, the County hosted 15 stakeholder meetings between May and August 2021, drawing over 500 participants. Two steering committee meetings (20 representatives) were held in September 2021. Attendees and representatives included target populations (veterans, youth, seniors, and individuals with lived experience), and County departments/agencies,

cities, law enforcement, housing developers, faith and community based organizations, and homeless advocates. Input from this planning process resulted in the establishment of four broad strategies: 1) system and policy change to address the root causes of homelessness, 2) expand homelessness prevention and housing programs, 3) create healthy communities to improve the quality of life for unsheltered individuals, and 4) continue to expand coordination between systems, increase the use of data to improve programs, and increase training opportunities for all partners.

1.3.5 SHORT-TERM RENTALS

Between August 2021 and March 2022, the County conducted a survey of residents and property owners in the Mountain and Desert regions on the concerns regarding short-term rentals. This survey was not conducted in the Valley region as short-term rentals are not permitted in the Valley region. The survey was completed by 2,805 respondents (60% from the Mountain region and 40% from the Desert regions (mostly the East Desert)), with the most input coming from the following communities: Bear Valley, Lake Arrowhead, and Joshua Tree. Of these respondents, 1,719 were residents (58% from the Mountain region and 42% from the Desert regions), with the greatest response coming from the following communities: Lake Arrowhead (491), Joshua Tree (335), Bear Valley (238), and Running Springs (103). The survey asked about the topics of concern listed below, with the number and percentage of residents (in the Mountain or Desert region) that indicated some level of concern listed in parentheses.

- Noise (Mountain: 391, 40%; Desert: 318, 44%)
- Parking (Mountain: 381, 39%; Desert: 208, 29%)
- Traffic (Mountain: 355, 35%; Desert: 286, 39%)
- Lack of timely response from owner/management (Mountain: 356, 36%; Desert: 278, 38%)
- Trash/dumping (Mountain: 401, 41%; Desert: 299, 41%)
- Reduction in long-term rental options (Mountain: 350, 35%; Desert: 299, 41%)
- Privacy (Mountain: 359, 41%; Desert: 307, 41%)
- Impacts on roads and infrastructure (Mountain: 361, 37%; Desert: 301, 41%)
- Animals loose or barking (Mountain: 314, 32%; Desert: 245, 34%)
- Loss of neighborhood feeling/familiarity (Mountain: 372, 38%; Desert: 305, 42%)
- Not sure who to call or report issue (Mountain: 310, 31%; Desert: 271, 37%)

Of the roughly 1,700 respondents, roughly a third or more expressed some level of concern on every issue. Many of the issues relate to nuisance concerns (e.g., noise) and a request for greater regulation and/or code enforcement. Other issues (e.g., impact on roads) relate to concerns over greater population impacting infrastructure. One issue relates closely to the provision of suitable housing stock: concerns on short-term rentals reducing long-term rental options. Roughly 40% of Desert region respondents and 35% of Mountain region respondents indicated that they were concerned about this issue. Additional public input from Desert region residents received during the distribution of the draft Housing Element reiterated this concern.

~~1.2.5~~1.3.6 PUBLIC INPUT AND RELATIONSHIP TO PROGRAMS

The input described above directly influenced numerous housing programs listed in Section 5 of this Element. The following summarizes and connects the public input collected to Programs 2, 3, 4, 6, 7, 8, 10, 12, and 19.

While the majority of unincorporated communities expressed a strong desire to retain their low density and rural nature, the community of Bloomington indicated a desire for amenities and housing opportunities associated with more intense suburban levels of development. This input led directly to the County seeking state funding through the Local Early Action Planning (LEAP) Grant and create Program 2 to conduct a study and establish funding mechanisms for near-term sewer expansion concurrent with future housing development in Bloomington.

During outreach conducted between 2015 and 2018, the County received numerous requests at every meeting to facilitate the process of adding additional units on existing lots without the cost of subdivision and/or rezoning so that residents could add affordable housing for their family members (adult children and older parents) and to add options for supplemental revenue. This desire was reinforced during outreach associated with the Consolidated Plan and Analysis of Impediments to Fair Housing, which also indicated a desire for more rental options for seniors that were affordable and promoted ongoing self-sufficiency, privacy, and a sense of independence. In response to all of this input, the County bolstered its focus on promoting and facilitating accessory dwelling units in Program 3.

Unincorporated residents also expressed concern about the persistent popularity of short-term rentals, both in terms of nuisance issues and the potential negative impact on the supply of affordable long-term housing for lower income residents and employees. To bolster the County's recent modifications to limit the development of short-term rentals to the Mountain and Desert areas (see str.sbcounty.gov), public input directly influenced the creation of Program 4 to evaluate the potential impacts of short-term rentals on the supply of affordable housing and the local hotel industry.

In parallel, unincorporated residents across a broad range of communities communicated a desire for more rental housing opportunities and rental assistance—particularly during the outreach for the Consolidated Plan and Analysis of Impediments to Fair Housing. In addition to influencing Program 4, this input encouraged the County to include a program in the Consolidated Plan and Programs 7 and 8 in this Element to support the development and modernization of affordable rental housing, including projects located near job centers that will be affordable to service employees and other low-wage members of the workforce. While the initial quantified objective is relatively small, the County is looking for additional funds and opportunity sites to bolster its efforts.

Extensive input was received regarding the level of homelessness throughout the entire county. While the number of people observed experiencing homelessness in unincorporated areas is relatively small, the County recognizes the transient nature of homelessness and its role to address the issue on behalf of and in coordination with all jurisdictions, agencies, and stakeholders in San Bernardino County.

Program 10 reflects the quantified objectives set forth by the Homeless Strategic Plan, which was generated in parallel with the creation of the Housing Element.

Numerous individual property owners requested that the County either eliminate the requirement for specific technical studies or conduct larger studies to streamline smaller housing projects and reduce the cost of building individual houses, particularly in the outlying desert communities. This input led directly to the County seeking state funding through the SB 2 Planning Grant and create Program 13~~2~~ to prepare a series of technical studies on the issue of biological resources, cultural resources, hazards, and hydrology in key areas that align with areas of anticipated growth in the overall Policy Plan and the housing opportunities in this Housing Element.

Finally, public input collected during outreach for the Consolidated Plan and Analysis of Impediments to Fair Housing directly affected the approach for multiple programs as well as the County's analysis of vacant ~~and underutilized~~ sites for new lower income housing. The input also influenced the approach for Program ~~19~~ 21 that will ultimately lead to the creation of an Affirmatively Furthering Fair Housing Plan that expands upon the recent Analysis of Impediments to Fair Housing and includes additional community and stakeholder engagement.

After a submittal to HCD of an initial draft in December 2021, A revised draft of this element was made available to the public on May 23, 2022, through its website, 14 days prior to the County's resubmittal of the draft to HCD for evaluation for certification compliance. The County also distributed a link to the revised element directly to those who had expressed direct interest in and or commented on a previous draft of the element, either through an email response to an individual's email address, a letter sent to the individual's mailing address, or an email distribution list to which an individual had previously subscribed (the County's govDelivery citizen communication system).

During the 14 days of public review, the County received eight comment letters, including representatives from the Inland Counties Legal Services, Morongo Basin Conservation Association, Peoples Collective for Environmental Justice, Sierra Club, and several residents from East Desert communities. The County considered these comments over the course of two weeks and made the following types of revisions:

- Data corrections and clarifications (e.g., incorrect figures or notes on sources)
- Clarifications on the amount and nature of public outreach
- Expedited dates, additional narrative, and refinement of Program 4. Short-term Rentals

1. Introduction

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2. COMMUNITY PROFILE

The housing needs in unincorporated San Bernardino County are determined by characteristics of residents (resident age, household size, income, and employment) and available housing (number of units, tenure, size, cost, etc.). As demographic and socioeconomic conditions change, different housing opportunities arise and/or must be created to meet demand. This section describes the characteristics of the existing and projected population and housing stock in order to define the extent of housing needs in our unincorporated communities. This information helps to provide direction in updating the County's housing element goals, policies, and programs. (Note that with the exception of some demographic data, 2020 Census data was not available at the time of the element's production.)

2.1 DEMOGRAPHICS

2.1.1 POPULATION

Population Growth

Since the 1950s, southern California has expanded outward from downtown Los Angeles as developers looked for opportunities to house the region's growing population. In recent decades, the Inland Empire (which includes San Bernardino County) has been one of the fastest growing regions in the nation. Growth in the total county area, including incorporated areas, peaked in the 1990s with a growth rate of nearly 60%. Growth remained strong in recent decades though the rate declined below double digits for the first time between 2010 and 2020. The number of people living in the unincorporated areas has fluctuated over the years and has only increased from about 298,000 in 1970 to around 300,000 in 2020. This is because new growth tends to occur in incorporated areas (which contains infrastructure, services, and amenities that support new development), and because incorporated communities often annex territory associated with proposed development projects. Much smaller amounts of growth occur in unincorporated areas that remain unincorporated. Table 2-1 displays population trends since 1950.

Table 2-1 Population Growth Trends 1950–2020

	Unincorporated Area		Total County Area	
Year	Population	Percent Change	Population	Percent Change
1950	--	--	281,642	--
1960	--	--	503,591	79%
1970	297,786	--	682,233	36%
1980	316,400	6%	878,000	29%
1990	323,500	2%	1,396,600	59%
2000	291,042	-10%	1,701,374	22%
2010	291,584	0.19%	2,033,141	20%
2020	300,478	3%	2,181,654	7%

Source: 2020 Census and California Department of Finance for all other years

Age, Race, and Ethnicity

Shown in Table 2-2, the age distribution of the unincorporated areas and San Bernardino County are generally similar. The largest differences are among working adults and seniors—the unincorporated area has a larger share of older working adults and seniors, and the County as a whole has a larger share of younger working adults. Still, the overall age difference of residents between the County and unincorporated areas are statistically insignificant across the various categories.

Table 2-2 Population Age Characteristics in 2019

Age Group	Unincorporated Area		Total County Area	
	Residents	Percent of Total	Residents	Percent of Total
Preschool (0–4)	20,676	7%	153,784	7%
School (5–17)	56,509	19%	417,784	19%
College-Age (18-24)	30,131	10%	226,843	11%
Young Working Adults (25–44)	78,567	26%	601,637	28%
Older Working Adults (45–64)	76,971	25%	507,022	24%
Seniors (65+)	41,760	14%	241,961	11%
TOTAL	481,236	100%	3,345,867	100%

Source: American Community Survey, 2019 5-Year Estimates

The population in San Bernardino County is becoming increasingly diverse, with non-White residents representing 66% of total population in 2010 and 71% of total population in 2019 (see Table 2-3). However, the race and ethnic distribution is significantly different when comparing the entire county area and its unincorporated communities, with White residents representing 43% of the total unincorporated population compared to 29% in the total county area. The largest non-White ethnic group is Hispanic, which makes up 48% of the population of the unincorporated area. These figures are very similar to 2020 Census data, which at the time of the element's production was limited to population 18 years and older.

Table 2-3 Population Racial/Ethnic Characteristics in 2019

Racial/Ethnic Group	Unincorporated Area		Total County Area	
	Residents	Percent of Total	Residents	Percent of Total
White	130,331	43%	613,066	29%
Hispanic	145,007	48%	1,145,874	53%
Black or African American	11,939	4%	169,340	8%
Asian and Other Pacific Islander	8,291	3%	150,165	7%
All Others	9,046	3%	70,586	3%
TOTAL	304,614	100%	2,149,031	100%

Source: American Community Survey, 2019 5-Year Estimates

2. Community Profile

2.1.2 EMPLOYMENT

San Bernardino County's emergence has increasingly become a job center as a result of the out-migration of firms from coastal counties to the Inland Empire, where land is available for manufacturing, distribution, and commerce. Between 2000 and 2010, the national recession has significantly slowed job growth and the unincorporated area lost over 13,000 jobs. Job growth began to rebound slowly in 2012 and is projected to continue to grow through 2045 (see Table 2-4). Job growth in the unincorporated areas will continue to be lower compared to incorporated areas as retail and office jobs are located next to more densely populated areas generally found in incorporated cities and towns.

Shown in Table 2-5, the three largest job sectors for San Bernardino County residents are education-health, retail trade, and manufacturing. The largest employment sectors have a high percentage of lower or entry-level positions: the average annual salary for the three largest employment sectors in the unincorporated area are $46,000 for education-health, $29,000 for retail, and $50,000 for construction.

Table 2-4 Projected Employment Growth, 2000-2045

Area	Reference Year			Percent Increase 2016–2045
	2000	2016	2045	
Unincorporated County	56,100	58,800	72,900	24%
Total San Bernardino County	594,900	791,000	1,064,000	35%

Sources: 2000 Census and 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

Table 2-5 Jobs Held by Residents by Sector in 2019

Employment Sector	Unincorporated Area	Percent	Total County	Percent
Agriculture, Forestry, Fishing, and Mining	1,628	1.4%	914,514	0.7%
Construction	11,650	9.8%	6,472	7.5%
Manufacturing	8,840	7.4%	68,852	8.5%
Wholesale Trade	3,201	2.7%	77,595	3.3%
Retail Trade	13,799	11.6%	30,425	12.8%
Transportation, Warehousing, and Utilities	12,007	10.1%	117,137	10.1%
Information	1,611	1.4%	92,078	1.2%
Finance, Insurance, Real Estate, Rental, Leasing	4,465	3.8%	11,123	4.6%
Professional, Scientific, Management, Admin.	11,391	9.6%	42,448	9.6%
Educational, Health and Social Services	23,944	20.1%	87,366	21.9%
Arts, Entertainment, Recreation, Lodging & Food	12,441	10.5%	200,674	9.3%
Other Services	6,607	5.6%	84,646	5.1%
Public Administration	7,340	6.2%	46,773	5.3%
TOTAL	118,924	100%	807,948	100%

Source: U.S. Census, American Community Survey, 2019 5-Year Estimates

The largest employers in San Bernardino County can be found in Table 2-6. The top ~~24~~ employers represent the following sectors: health care services, education, professional services, distribution, amusement, transportation, and government. This reflects the large percentages of employees in the educational, health and social services, and retail trade sectors. The vast majority of the major employers in San Bernardino County are in incorporated communities, with exceptions in Bloomington (FedEx Ground center), military bases, and several resorts in the Mountain region. The largest single employer is the United States Department of Defense through a number of active military bases (29 Palms Marine Corps Air Ground Combat Center, Fort Irwin, Naval Air Weapons Station China Lake, March Air Force Base, and Marine Corps Logistics Base Barstow) that employ tens of thousands of active military personnel (some with dependents), and civilian personnel. While the Fort Irwin and China Lake facilities are far from most urbanized areas in the county, the 29 Palms and Barstow facilities are near incorporated jurisdictions and unincorporated communities. Housing options are provided through on-base housing: barracks for unaccompanied lower level personnel, single and multifamily housing for higher level and personnel with families, and basic allowance for housing for those choosing to live off-base.

Table 2-6 Major Employers in the County, 2019

Employer Name	Location	Industry
Amazon Fulfillment Center	Various	Mail Order Fulfillment Service
Arrowhead Regional Medical Center	Colton	Hospitals
Bear Mountain	Big Bear Lake	Skiing Centers & Resorts
Big Bear Mountain Resorts	Big Bear Lake	Resorts
Burlington Distribution Center	San Bernardino	Distribution Services
California State University San Bernardino	San Bernardino	Schools-Universities & Colleges Academic
Community Hospital-San Bernardino	San Bernardino	Hospitals
Environmental Systems Research	Redlands	Geographics Information Systems
FedEx Ground	Bloomington	Delivery Service
Inland Empire Health Plan	Rancho Cucamonga	Health Plans
Loma Linda University Health Board	Loma Linda	University-Governing Body/Regent/Trustee
Loma Linda University Medical Center	Loma Linda	Hospitals
Mountain High Ski Resort	Wrightwood	Skiing Centers & Resorts
Ontario International Airport	Ontario	Airports
Ontario-Montclair School District	Ontario	School Districts
Patton State Hospital	Highland	Hospitals
Redlands Community Hospital	Redlands	Hospitals
San Antonio Regional Hospital	Upland	Hospitals
San Bernardino County School Superintendent	San Bernardino	Schools & Educational Services NEC
San Bernardino County Sheriff	San Bernardino	County Government-General Offices
St Bernardine Medical Center	San Bernardino	Hospitals
St Mary's Medical Center	Apple Valley	Hospitals
Transportation Department	San Bernardino	State Government-Transportation Programs
United States Military	North/East Desert	US Government / National Defense
YRC Freight	Bloomington	Trucking-Motor Freight

Source: America's Labor Market Information System (ALMIS) Employer Database, 2021

2.1.3 HOUSEHOLDS

Household Growth

In 2010 approximately 15% of households in the County resided in unincorporated communities. As shown in Table 2-7, between 2010 and 2020, just over 4,000 households in unincorporated areas compared to over 100,000 households added in incorporated cities. Between 2020 and 2030, SCAG projects approximately 5,800 households to be added in unincorporated areas compared to over 80,000 more households in incorporated cities. In comparison, the 2021–2029 RHNA allocation allocates 8,832 units to the unincorporated region, which includes 6,000 new units based on projected growth of new households and about 2,800 new units based on pent-up demand from existing households. Note that the following tables may not report consistent totals due to the use of different data sources. In many cases, due to the delay in rollout of 2020 Census data, 2019 data is the latest available for detailed characteristics, but it may return results that are different compared to total figures available for year 2020.

Table 2-7 Projected Household Growth, 2010-2045

Area	Reference Year				Percent Increase 2020–2030
	2010	2020	2030	2045	
Unincorporated County	94,085	98,783	104,540	113,790	6%
Total San Bernardino County	611,618	666,362	749,286	873,511	12%

Sources: 2010 and 2020 Census and 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

Household Type

Household characteristics such as size, income, and physical ability affect the need and preference for housing. For example, families with young children often desire the living space and the financial investment that single-family homeownership offers. In contrast, single-person households are drawn to apartments and townhomes, which are easier to afford and maintain and offer greater mobility. These patterns underscore the need for a diversity of housing types and prices for different households.

The Census Bureau classifies households into two general groups: families or nonfamilies. Housing needs tend to vary for each broader group of household and individual subsets of each. Families include married couples—with and without children—and related persons living together. Nonfamilies include single-person households and unrelated people living in the same home. Persons living in college dormitories, nursing homes, residential care facilities, and similar group home settings are not counted as a household but are included in the population count.

The distribution of households by type varied slightly between the unincorporated areas and County as a whole. Table 2-8 details the differences in household composition between the County and its unincorporated areas, alongside figures for 2010 and 2019. In either geography or reference year, family households comprised about three quarters of all households, and just over half of households are married with/without children. The unincorporated areas have a slightly higher proportion of nonfamily households, likely because of the greater proportion of older residents who spend more of their later years as single-person households (see Table 2-9).

Table 2-8 Composition of Households in 2010 and 2019

Characteristics	Unincorporated Area				Total County Area			
	Households		Percent of Total		Households		Percent of Total	
	2010	2019	2010	2019	2010	2019	2010	2019
Families								
Married with Children	22,295	23,273	24%	24%	166,035	168,546	27%	27%
Married without Children	28,436	27,009	30%	28%	160,892	162,689	26%	26%
Other Families	18,267	19,272	19%	20%	143,513	155,050	24%	24%
Nonfamilies								
Single-Person	19,057	25,672	26%	27%	108,095	149,756	23%	24%
TOTAL	**94,085**	**95,226**	**100%**	**100%**	**611,618**	**636,041**	**100%**	**100%**
Average Household Size	**2010: 3.06 / 2021: 3.09**				**2010: 3.26 / 2021: 3.30**			

Source: American Community Survey, 2019 5-Year Estimates; California Department of Finance (2010 and 2021 household size estimates)

Household age also provides an indication of housing need. Younger households and seniors may only be able to afford or tend to prefer smaller and moderately priced housing units, although the preferences in tenure can be different. Middle-aged adults with children tend to prefer larger housing units with more bedrooms. As shown in Table 2-9, the unincorporated communities have a larger percentage of households headed by someone 45 years and older. Households headed by an individual 44 years and younger are more prevalent in the incorporated areas of San Bernardino County. This is due in large part to the more urban densities and services available in the incorporated communities through apartment and townhome housing products.

Table 2-9 Household Age Distribution in 2010 and 2019

Age of the Head of Household	Unincorporated Area				Total County Area			
	Households		Percent of Total		Households		Percent of Total	
	2010	2019	2010	2019	2010	2019	2010	2019
15 to 24 years	3,365	2,204	4%	2%	25,841	18,545	4%	3%
25 to 34 years	11,821	13,580	13%	14%	99,072	103,714	16%	16%
35 to 44 years	16,564	16,213	18%	17%	128,766	125,078	21%	20%
45 to 54 years	22,734	18,666	24%	20%	143,261	130,867	23%	21%
55 to 64 years	19,419	20,618	21%	22%	108,602	124,807	18%	20%
65 and older	20,182	23,945	21%	25%	106,076	133,030	17%	21%
TOTAL	**94,085**	**95,226**	**100%**	**100%**	**611,618**	**636,041**	**100%**	**100%**

Source: American Community Survey, 2019 5-Year Estimates

Household Income

Each year, the State of California Department of Housing and Community Development (HCD) publishes income limits to calculate affordable housing costs for applicable housing assistance programs. The average family size (nationally, statewide, and for unincorporated and incorporated San Bernardino County areas) is over 3.0, and so HCD (as well as the federal government) uses a four-person family for

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the purposes of calculating the area median income (AMI) and the subsequent income limits. The 2021 AMI for jurisdictions in San Bernardino County is $77,500 for a four-person household.

These income limits are then adjusted by household size between a range of one- and eight-person households and grouped into five income classifications for purposes of determining the need for assistance. Additionally, state income guidelines and housing programs often combine extremely low and very low income into one "very low income" category. Also common is the grouping of extremely low, very low, and low income categories a "lower income" category. Both terms are used throughout this housing element.

Shown below in Table 2-10 is the estimated income distribution of households in the unincorporated county and the overall county based on Census data for 2019 and HCD income limits set in April 2020 (using income limits for a 3-person household due to the estimated 3.09 household size for unincorporated areas). While income distribution is generally similar, unincorporated communities tend to have slightly more lower income households and incorporated communities tend to have slightly more above moderate income households. This can be attributed in part to the lower cost of living in unincorporated communities, where land and housing prices are much cheaper.

Table 2-11 provides the income limits by household size for San Bernardino County households as of 2021. The income limits in this table will be used for the purposes of calculating housing affordability and capacity for this element and the 2021–2029 planning period.

Table 2-10 Household Income Distribution in 2019

Income Categories			Unincorporated Area		Total County Area	
Name	% AMI	$ Limit	Households	Percent of Total	Households	Percent of Total
Extremely Low	0–30%	$21,720	15,271	16%	86,925	14%
Very Low	30–50%	$33,900	8,804	9%	56,889	9%
Low	50–80%	$54,250	18,260	19%	107,596	17%
Moderate	80–120%	$81,300	16,900	18%	115,327	18%
Above Moderate	>120%	>$81,300	35,991	38%	269,304	42%
		TOTAL	**95,226**	**100%**	**636,041**	**100%**

Source: HCD 2020 Income Limits for a 3-person household and American Community Survey, 2019 5-Year Estimates

Table 2-11 Income Limits by Household Size, 2021

Income Category	% AMI	1-person	2-person	3-person	4-person	5-person
Extremely Low	0–30%	$16,600	$19,000	$21,960	$26,500	$31,040
Very Low	30–50%	$27,650	$31,600	$35,550	$39,500	$42,700
Low	50–80%	$44,250	$50,600	$56,900	$63,200	$68,300
Moderate	80–120%	$65,100	$74,400	$83,700	$93,000	$100,450
Above Moderate	>120%	>$65,100	>$74,400	>$83,700	>$93,000	>$100,450
Median	100%	$54,250	$62,000	$69,750	$77,500	$83,700

Source: HCD 2021 Income Limits

2.2 HOUSING CHARACTERISTICS

2.2.1 HOUSING STOCK GROWTH

Table 2-12 compares the total housing stock of the unincorporated areas, San Bernardino County as a whole, and the six-county region (referred to as the Southern California Association of Governments or SCAG). The table shows that more housing units were built in San Bernardino County's incorporated communities between 2000 and 2010 compared to both the unincorporated areas and the entire SCAG region.

This pattern is consistent with the migration of residents into the inland Riverside and San Bernardino counties during the 2000s. Housing developers were able to build and sell lower-priced single family homes on larger lots in the inland Riverside and San Bernardino counties compared to neighboring coastal counties. The largest housing growth took place in Riverside County between 2000 and 2010 through large-scale of master-planned development, including the incorporation of four new cities between 2008 and 2011. Housing growth in San Bernardino County also took place largely through master-planned development—primarily in existing cities. With the exception of substantial growth in the City of Victorville, growth was focused within cities in the Valley region.

While housing production slowed between 2010 and 2020 throughout southern California, growth rates in the incorporated San Bernardino County communities continued to outpace the unincorporated communities and kept pace with the overall SCAG region. Fewer than 3,000 new units were built in the unincorporated communities between 2010 and 2020, reflecting the desires of housing developers, home buyers, and renters desire to be closer to services and amenities associated with living in a city or incorporated town. New housing units in unincorporated areas tends to be homes built by individuals or small batches of rural estates (half-acre lots or larger), with most of the units relying on onsite water wells and septic systems.

Table 2-12 Housing Stock Growth 2000 to 2020

Area	2000	2010	2020	Percent Change	
				2000-2010	2010-2020
Unincorporated San Bernardino County	126,863	132,780	135,075	5%	2%
Incorporated San Bernardino County	474,506	566,201	591,605	19%	5%
Overall San Bernardino County	601,369	699,637	726,680	16%	4%
Overall Riverside County	584,674	800,707	856,124	37%	7%
Overall SCAG Region	5,722,035	6,327,311	6,634,514	11%	5%

Source: California Department of Finance, 2000, 2010, and 2020

2.2.2 HOUSING UNIT TYPE

In a complete community, the availability of different housing products is important for residents. Ideally, residents of different age and income levels will have a wide choice of housing available in their community of choice. In an area as vast as San Bernardino County, where urban form ranges from rural to suburban to urban densities, a broad mix of housing is less possible. Outside of more urban areas, this diversity may not exist due to infrastructure constraints. Infrastructure is typically cost prohibitive to build until a certain density of population and housing occur, and the associated density provides significant revenues to fund infrastructure. This explains why higher density housing tends to cluster in incorporated cities and towns.

Table 2-13 details the composition of housing units in the unincorporated communities and the County of San Bernardino as a whole. This comparison underscores the infrastructure limitations in the unincorporated communities, the economics of how affordable housing is provided, and the relationship between density and housing affordability. According to the California Department of Finance, there were nearly 700,000 housing units in San Bernardino County, with single-family detached units comprising the vast majority (71%) of total housing stock. Out of the 135,000 total housing units in the unincorporated areas, 83% are single family detached. Multifamily housing with five or more units (generally what people think of as apartments), represents 13% of units throughout San Bernardino County but only 2% of units in unincorporated areas.

Table 2-13 Housing Unit Type in 2020

	Unincorporated Area		Total County Area	
Housing Type	**Units**	**Percent of Total**	**Units**	**Percent of Total**
Single Family Detached	112,383	83%	516,651	71%
Single Family Attached	2,930	2%	25,181	4%
Mobile Homes	13,378	10%	43,962	6%
Multifamily 2 to 4 units	4,087	3%	46,375	6%
Multifamily 5 or more	2,297	2%	94,511	13%
TOTAL	135,075	100%	726,680	100%

Source: California Department of Finance, 2020

The differences in housing type between the unincorporated areas and the overall county reflect differences related to land and infrastructure costs. Land is cheaper in unincorporated areas, which enables an individual to purchase land (aka a parcel or housing lot) that is one-half acre or larger. Lots that are at least one-half acre in size can be developed with a single family home that uses onsite water (a well) and wastewater systems (a septic system). However, lots that are within a certain distance of a sewer system and/or piped water system (even if larger than one-half acre) are generally required to connect to those systems and are not permitted to use onsite water or wastewater systems. The cost to connect to existing sewer or piped water systems beyond a certain distance or to build a wastewater treatment system (such as a small-batch treatment plant) that can support multiple homes can be very costly.

In the unincorporated areas, there are thousands of acres of land that could support a single family home due to the low cost of land and the ability to use onsite water and wastewater systems. In contrast, land in incorporated cities and towns is more expensive, developed at much higher densities, and almost always requires a connection to existing sewer and water systems. The higher densities in incorporated communities, however, facilitates the development and maintenance of piped water and off-site wastewater treatment (aka sewer) systems.

2.2.3 HOUSING TENURE AND VACANCY

Housing tenure refers to whether a unit is owned or rented. Homeownership rates (for occupied units) are much higher in unincorporated areas (66%) compared to the county as a whole (52%). As discussed in the previous section, high homeownership rates are a direct reflection of the ability to build a single family home for less than the cost of renting a home or apartment in incorporated areas. Additionally, roughly one-third (almost 8,000) of all units (roughly 28,000) constructed between 2010 and 2021 in incorporated areas were multifamily, with many developed as rental housing. In comparison, new housing constructed in unincorporated areas has continued to be predominantly single family detached units, which tend to be occupied by the property owners.

The vacancy rate reflects how well available housing units meet the current housing market demand. The availability of vacant housing units provides households with choices on different unit types to accommodate changing needs (e.g., single persons, newly married couples, and elderly households typically need smaller units than households with school age children). A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high vacancy rate may indicate an imbalance between household characteristics and the type of available units, an oversupply of housing units, or a large number of vacation/seasonal units.

In 2019, San Bernardino County had a vacancy rate of 0.9% for owner-occupied homes and 1.5% of renter-occupied units. The vacancy rate in the unincorporated areas is similar at 1.74% for owner-occupied homes and 1.20% for renter-occupied units. An optimal vacancy rate is generally considered 5% to 6% for rental units and 1.5% to 2.0% for owner-occupied units. Higher vacancy rates lead to lower housing production while lower vacancy rates lead to increased rents and purchase prices. By these standards, the county as a whole and the unincorporated area are both tight housing markets, due in part to the slowdown in housing production since 2010. The rental market is particularly tight, especially when compared to the 2010 rates of 9.5% for the unincorporated areas and 8.7% for the county as a whole. It should be noted that the economic recession of 2007 to 2009 contributed substantially to the higher vacancy rates in 2010. Regardless, the lack of available and affordable ownership housing has created an increased demand for rental housing. While multifamily housing production is increasing, the development community has not built enough rental housing to allow for a healthier vacancy rate.

In the unincorporated county, a large number of housing units (between 30,000 and 40,000) are vacant but not for sale or rent. Data listed in Table 2-14 as "other vacant" is from 2019 ACS; 2020 Census data released in August 2021 reported lower household and vacancy numbers for the unincorporated areas). Vacant housing is primarily owned by individuals for seasonal, recreational, or occasional use (including

short-term rentals), with most (approximately 25,000 to 30,000) in the Mountain region. Between 20,000 and 25,000 of vacant units are in the unincorporated Mountain areas and over 7,000 are in the City of Big Bear Lake. In fact, most of the units in the unincorporated communities of Lake Arrowhead (71%), Big Bear City (58%), Running Springs (57%), and Crestline (51%) are owned by individuals for seasonal, recreational, or occasional use (including short-term rentals).

A number of unincorporated communities in the Desert region also contain a substantial amount of vacant housing, with roughly one in four units sitting vacant for at least part of the year. In Joshua Tree, for example, of the estimated 900 to 1,000 total vacant units (23% of all units in Joshua Tree), over 700 or 18% of all units are for seasonal, recreational, or occasional use. In Homestead Valley, roughly one in three units (778) sit vacant for at least part of the year, most of which (563) are for seasonal, recreational, or occasional use.

Since 2020, the popularity of short-term rentals has expanded substantially, with thousands of short-term rental permits issued throughout the Mountain and Desert regions. It is unclear exactly how many of these units were previously occupied by long-term renters, how many are maintained as seasonal homes for the property owner (who also makes the units available as short-term rentals), and how many are owned by companies/investors that operate the units exclusively as short-term rentals.

Both the Mountain and Desert regions are popular tourist destinations that draw people from around the nation. The Mountain region in particular contains several resorts with workers earning lower incomes that need seasonal or full-time housing. The Desert regions offer their own unique tourist experience, with communities in the East Desert offering nearby access to Joshua Tree National Park. Based on public outreach input, some of these workers have difficulty finding housing due in part because of the prevalence of short-term rentals, which can also cause problems for local businesses that struggle to maintain a workforce. ~~Concerns expressed in the Desert region related more to noise issues associated with short-term rentals, though some residents also indicated that short-term rentals may impact the ability of some (e.g., students attending Copper Mountain College) to obtain nearby and/or affordable housing.~~ Other public input indicates that the short-term rental market may have already reached or be reaching a saturation as bookings decrease and some property owners complaining of failing to make adequate revenue.

There are approximately 14,000 to 18,000 housing units that are vacant for other reasons (10,000 to 12,000 in incorporated areas and 4,000 to 6,000 in unincorporated areas). Roughly 14% of those in incorporated areas are in the City of San Bernardino. According to the U.S. Census, the reasons for non-seasonal vacancy are (listed in descending order): personal/family preference, in need of repair and not ready for rent or sale, in foreclosure, currently being repaired, used for personal storage, in a legal proceeding, currently preparing for rent/sale, or possibly abandoned or to be demolished/condemned. Some of these vacant units will eventually make it into the housing market for rent or sale while others will remain off the market.

Table 2-14 Housing Tenure and Vacancy in 2019

Housing Tenure/Status	Unincorporated Area		Total County Area	
	Units	Percent of Total	Units	Percent of Total
Owner occupied	62,979	~~38~~46%	380,281	53%
Renter occupied	32,247	~~20~~23%	255,760	35%
Total occupied	95,226	~~20~~69%	636,041	88%
Vacant (unoccupied)	42,261	~~27~~31%	84,716	12%
TOTAL	137,487	100%	720,757	100%
Vacant (for rent)	1,671	1.2~~0~~%	10,649	1.5%
Vacant (for sale)	2,311	1.4~~7~~%	6,710	0.9%
Vacant (other vacant)	38~~9,555~~279	27.8~~4.1~~%	67,357	9.3%

Vacancy Status for Select Unincorporated Census Designated Places

Unincorporated Place	Total Units	Total Vacant	Percent of Total Units that are Vacant and…		
			For Rent/Sale	Seasonal/Rec	Other
Valley Region CDPs	**13,899**	**7%**	**3%**	**<1%**	**3%**
Bloomington	6,352	10%	6%	0%	4%
Mentone	3,451	3%	2%	0%	1%
Muscoy	2,800	3%	1%	1%	2%
San Antonio Heights	1,296	9%	5%	1%	3%
Mountain CDPs	**23,303**	**59%**	**4%**	**52%**	**4%**
Big Bear City	7,575	58%	2%	55%	2%
Crestline	3,685	51%	5%	38%	9%
Lake Arrowhead	8,529	71%	5%	63%	3%
Lytle Creek	131	27%	7%	20%	0%
Oak Glen	17	9%	0%	9%	0%
Running Springs	2,158	57%	4%	49%	4%
Wrightwood	1,208	44%	5%	34%	5%
North Desert CDPs	**2,885**	**15%**	**3%**	**8%**	**4%**
Homestead Valley	778	36%	3%	26%	7%
Lenwood	195	14%	7%	3%	5%
Lucerne Valley	707	25%	3%	14%	7%
Mountain View Acres	65	5%	4%	0%	2%
Oak Hills	298	9%	2%	4%	3%
Phelan	520	10%	1%	4%	5%
Spring Valley Lake	322	10%	4%	6%	1%
East Desert CDPs	**1,478**	**25%**	**3%**	**18%**	**4%**
Joshua Tree	923	23%	2%	18%	3%
Morongo Valley	555	28%	5%	17%	5%

Source: American Community Survey, 2019 5-Year Estimates; figures subject to rounding.
Note: Data on unincorporated areas outside of census designated places (CDPs) not shown in the

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COVID-19 Pandemic

The ongoing COVID-19 Pandemic that began in 2020 and ~~will likely~~has extended into 2022 has created tremendous hardships on homeowners, renters, and landlords. With restrictions placed on businesses and residents (such as the stay-at-home order in March 2020), unemployment rates reached over 13% in April 2020, severely impacting residents' ability to pay monthly rent and mortgages. With national, state, and local assistance and eviction restrictions, tens of thousands of county residents were able to remain in their homes and landlords were able to remain financially solvent.

Easing of COVID restrictions in 2021 ~~has~~ allowed the economy (at all levels) to partially recover and the unemployment rate in San Bernardino County is down to 8% as of August 2021. The state legislature extended eviction moratorium and rent relief through the end of September 2021, and the County's Rent Relief Partnership offers residents up to 12 months of arrears (rent) and utilities accrued from March 13, 2020, to present and up to three months of prospective rent. This program is for households earning less than 50% of the area median income and will be available through September 30, 2022, or until funds are exhausted.

Without additional eviction restrictions and other financial assistance (at national, state, or local levels), the vacancy rate is expected to increase as well as rates of overcrowding and homelessness over the next few years. ~~The latest countywide point-in-time survey of those experiencing homelessness took place in April 2020 (just one month after the stay-at-home order was given), and the 2021 survey was cancelled due to the ongoing pandemic. Accurate estimates of homeless rates are unavailable for 2021.~~

2.2.4 HOUSING AGE AND CONDITION

Housing age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Older housing units are more likely to be in need of major repairs (e.g., a new roof or plumbing). Generally, houses built 30 or more years ago are considered potentially in need of rehabilitation and may require major repairs. Houses 50 years or older are more likely to need substantial and costly renovations, including upgrades to comply with current standards for fire and earthquake safety.

As shown in Table 2-15, the housing stock in San Bernardino County is relatively new, with over 70% of all units built after 1970 and one-third of all units built after 1990. A quarter of the units in San Bernardino County were built during the 1980s. In contrast with many older parts of the region, only 1 in 14 units in the County was built before 1950. This underscores the unprecedented development rate in the County over the past 50 years, particularly during the 1980s when roughly one-quarter of all housing in San Bernardino County was built.

Given the geographic size of the County, a housing conditions survey is not possible. However, several indicators point to substandard housing: housing unit age (built before 1940), incomplete kitchen facilities, incomplete plumbing, or no telephone service. Table 2-16 illustrates substandard housing indicators for unincorporated San Bernardino County households by tenure. While just over 8,600 units

are old enough to potentially need be in need of substantial repair, between one-half of a percent to just over one percent of units lack basic kitchen or plumbing facilities.

Over the past two decades, the number of units lacking basic facilities has decreased substantially, with figures down as much as 45% comparing 2000 vs 2019. Some of these units represent cabins used today for recreational purposes, particularly in the Mountain communities, where multiple units may share common toilet and kitchen facilities.

Table 2-15 Age of Housing Units in 2019

	Unincorporated Area		Total County Area	
Year Housing Built	Units	Percent of Total	Units	Percent of Total
Before 1939	3,743	3%	21,711	3%
1940–1949	5,305	4%	23,772	4%
1950–1959	15,073	13%	71,299	11%
1960–1969	12,423	10%	62,914	10%
1970–1979	16,052	13%	107,549	17%
1980–1989	28,498	24%	145,491	23%
1990–1999	19,809	16%	87,117	14%
2000–2009	15,488	13%	92,886	15%
2010 or later	4,124	3%	23,302	4%
TOTAL	**120,515**	**100%**	**636,041**	**100%**

Source: American Community Survey, 2019 5-Year Estimates

Table 2-16 Substandard Housing Indicators for Unincorporated Housing, 2000 vs 2019

	Renter				Owner			
	Units			Percent of Total Units in 2019	Units			Percent of Total Units in 2019
Housing Condition	2000	2010	2019		2000	2010	2019	
Lacking kitchen	753	359	449	1.4%	480	416	326	0.5%
Lacking plumbing	388	217	246	0.5%	591	333	325	0.8%
Lacking phone service	1,514	1,879	819	2.5%	1,096	1,143	990	1.6%
Units built before 1949			3,351	10.4%			5,361	7.8%

Source: U.S. Census, 2000, American Community Survey, 2010 1-Year Estimates, American Community Survey, 2019 5-Year Estimates

To augment the Census data, County Code Enforcement records were evaluated, finding that an annual average of four substandard housing citations were issued in unincorporated areas each year between 1999 and 2021 (total of 87, all single family detached homes). Geographically, these citations were distributed equally across both the four regions and throughout all of the unincorporated communities. In other words, there were no hot spots of homes in need of rehabilitation. The County also evaluated the degree of rehabilitation needed and found that roughly half of the citations (43) involved the need for minor repairs and the balance (44) of units required substantial repairs. The most common issue requiring minor rehabilitation was unpermitted construction (additions or accessory units). Major

rehabilitation citations were predominantly issued for gross neglect of maintenance that resulted in severely dilapidated and/or unstable structures.

The County also identified 130 units over the same time period that were abandoned and in need of either major rehabilitation or demolition to ensure safety (all single family detached homes). The distribution of these instances was limited to a handful in the Mountain region (8) and then distributed somewhat equally across all the unincorporated communities in the Desert regions when the number of such units in Trona is excluded. The community of Trona represents almost half of the abandoned units (59), with most of those occurring in 1999 (21) and the number of such units ranging between zero and seven in other years. Trona was established in connection with the mining industry (initially around Searles Dry Lake to mine borax), and the need for employees rises and falls commensurate with the market for various minerals mined in the area. Searles Valley Minerals remains the largest employer, but most employees moved out of Trona and now reside in and commute from the City of Ridgecrest (Kern County).

Overall, given the Census data and County local records, the number of units in disrepair and in need of rehabilitation assistance is likely extremely low throughout all parts of the unincorporated areas. The number of abandoned units is also relatively low (71 excluding Trona). Given the wide expanse and varied terrain of the unincorporated areas in the Mountain and Desert regions, however, there are likely some units in need of repair or that are abandoned and are unseen due to their location's remoteness or topography. Given the remote nature of these theoretical units and the usage patterns of many units in the Mountain and Desert regions (as seasonal vacation units or storage), it is likely that many of these unseen units in need of repair or that appear abandoned may be unused and unoccupied for most or all of the year.

2.2.5 HOUSING COST AND AFFORDABILITY

Affordability Thresholds

High housing cost burdens can lead to a number of unwanted situations, such as overcrowded homes; overpayment, which undermines a household's ability to pay for other important expenses, and premature deterioration of the housing stock due to deferred maintenance.

The calculation for rental housing affordability assumes that a household can expend no more than 30% of its monthly income on housing. Those purchasing a home can easily expend 35% or more of its monthly income on housing because of the equity and tax benefits of homeownership. However, to ensure a relatively conservative assumption for the maximum affordable purchase price, the calculation for ownership affordability assumes a 4% mortgage rate (derived from a lenders survey based on poor to fair credit), a 10% down payment, 1.1% property tax, and monthly debt of $250 for monthly utilities.

Table 2-17 breaks down the maximum rent and purchase for a two- and four-person household based on 2021 income limits published by HCD. These figures are used to evaluate how affordable the current housing stock is for existing and future residents. Individual housing programs funded by the federal or state government may require greater levels of affordability. These figures are also used to understand

the capacity of sites in unincorporated areas to be developed at prices that are affordable to a wide range of households.

Table 2-17 Maximum Rent and Purchase Price by Income Category

Income Category	Annual Income [1]	Maximum Affordable Rent Payment [2]	Maximum Affordable Purchase Price [3]
Two-Person Household			
Very Low (>50%)	$31,600	$790	$108,000
Low (51–80%)	$50,600	$1,265	$205,000
Moderate (81–120%)	$74,400	$1,860	$328,000
Above Moderate (120%)	>$74,400	>$1,860	>$328,000
Four-Person Household			
Very Low (>50%)	$39,500	$988	$149,000
Low (51–80%)	$63,200	$1,582	$270,000
Moderate (81–120%)	$93,000	$2,325	$423,000
Above Moderate (120%)	>$93,000	>$2,325	>$423,000

Source: PlaceWorks, 2021
[1] Based on HCD income limits, ~~April~~ December 2021.
[2] Calculated as 30% of income.
[3] Calculated with a debt-to-income ratio of 36 and assumes 10% down payment, 4% interest rate, and 1.1% property tax, and $250 for monthly utilities.

Home Prices

In the 1980s, the affordability of San Bernardino County's homes was the key variable driving the County's population growth. Like other housing markets in Southern California, San Bernardino County experienced a peak in sales prices in 2006, followed by a steady decline through the Great Recession. The market regained strength around 2012 and demand for housing increased toward the end of the decade.

Table 2-18 provides a summary analysis of homes built between 2018 and 2021. While new construction activity was healthy in 2019 and heading into 2020, the onset of the COVID-19 Pandemic in early 2020 led to immediate disturbances in the local, regional, statewide, and national economies. The residential development industry stalled as a whole, with builders slowing production, handcuffed by rising commodity prices, shortages of skilled labor, and pandemic-related restrictions. Individuals who would have otherwise purchased a new home (site built or manufactured unit), also held off and the amount of new single family homes built in the first half of 2021 is a fraction of previous years.

Still, San Bernardino County offers some of the most affordable housing options in Southern California. The sheer size and relative abundance of groundwater (even in the county's Desert regions ~~generates~~), allows an individual to build a home at a cost that is affordable to lower income households. Between 2018 and 2021, over a quarter of new single family homes built were purchased at prices that are within the maximum affordability thresholds shown in Table 2-17. Moreover, these single family homes are affordable at market prices (i.e., no subsidy). Almost another 30 percent of recently built homes were valued or sold at prices that are affordable for moderate income households.

A key factor in the County's affordability is its scale and pricing of developable land. Vacant residential land is widely available as lots that are generally at least one-half acre at prices that are a fraction of those

2. Community Profile

in the coastal counties. Even within the county unincorporated areas, the vast amounts of large rural-scale parcels can be purchased (and developed) at a fraction of the cost of smaller, suburban-scale parcels. Table 2-19 lists the land value of single family homes built between 2018 and the first portion of 2021 based on final sales data recorded in the County Assessor Tax Records.

Table 2-18 Summary Statistics of Single Family Homes Built between 2018 and 2021

Property Characteristics		Units by Income Category				
		Total	Very Low (<$150,000)	Low (<$270,000)	Moderate (<$423,000)	Above Mod (>$423,000)
ALL HOMES		**749**	**35**	**127**	**182**	**405**
PARCEL SIZE	Under ¼ acre	216	7	21	61	127
	Between ¼ and ½ acre	124	5	11	16	92
	Between ½ and 1 acre	48	2	14	9	23
	Between 1 and 2.5 acres	245	6	57	57	125
	Between 2.5 and 5 acres	69	10	19	16	24
	More than 5 acres	47	5	15	13	14
TYPE	Single Family Detached	653	26	84	139	404
	Manufactured Home	96	9	53	33	1
YEAR BUILT	2018	196	7	45	36	108
	2019	277	5	36	69	167
	2020	264	21	52	65	126
	2021	12	2	4	2	4
LOCATION BY COMMUNITY PLANNING AREA (CPA)	**Valley Region CPAs**	**140**	**1**	**6**	**18**	**115**
	Bloomington	4	-	-	2	2
	Mentone	126	1	3	14	108
	Muscoy	5	-	3	2	-
	San Antonio Heights	5	-	-	-	5
	Mountain Region CPAs	**200**	**9**	**20**	**38**	**133**
	Bear Valley	95	3	8	21	63
	Crest Forest	13	2	3	3	5
	Hilltop	8	1	2	3	2
	Lake Arrowhead	58	2	3	5	48
	Lytle Creek	4	-	2	2	
	Oak Glen	4	-	-	-	4
	Wrightwood	18	1	2	4	11
	North Desert Region CPAs	**255**	**3**	**49**	**82**	**121**
	Daggett	1	1	-	-	
	Helendale	9	-	-	3	6
	Lucerne Valley	18	-	4	14	
	Newberry Springs	4	-	3	1	
	Oak Hills	95	-	4	12	79
	Oro Grande	2	-	2	-	
	Phelan/Pinon Hills	125	2	36	52	35
	Yermo	1	-	-	-	1

Table 2-18 Summary Statistics of Single Family Homes Built between 2018 and 2021

Property Characteristics		Units by Income Category				
		Total	Very Low (<$150,000)	Low (<$270,000)	Moderate (<$423,000)	Above Mod (>$423,000)
	East Desert Region CPAs	**119**	**18**	**41**	**34**	**26**
	Homestead Valley	34	6	20	8	
	Joshua Tree	65	9	16	19	21
	Morongo Valley	7	2	1	3	1
	Pioneertown	13	1	4	4	4
	Other Uninc. Areas	**35**	**4**	**11**	**10**	**10**

Note: Home prices are shown to communicate the price ranges associated with each income category. However, the income categorization was based on and adjusted to align with annual HCD income limits between 2018 and 2021. Source: San Bernardino County Assessor Tax Records, July 2021

Table 2-19 Land Value of Single Family Homes Built between 2018 and 2021

Parcels		Average Value		Median Value		Minimum Value		Maximum Value	
Size (ac)	#	per lot	per acre	per lot	per acre	per lot	per acre	per lot	per acre
Under ¼	216	$85,003	$528,529	$1,200,000	$402,528	$5,552	$29,767	$500,343	$2,567,178
From ¼ to ½	124	$128,551	$379,518	$530,439	$346,420	$8,409	$18,393	$260,035	$793,851
From ½ to 1	48	$73,334	$108,714	$403,866	$57,268	$5,961	$7,322	$278,773	$385,274
From 1 to 2.5	245	$72,659	$38,491	$421,288	$35,455	$4,289	$2,570	$298,056	$247,144
From 2.5 to 5	69	$63,994	$17,164	$500,000	$10,870	$8,578	$1,733	$255,797	$62,385
More than 5	47	$120,553	$10,636	$673,200	$7,031	$28,382	$803	$577,368	$87,188

Note: Minimum and maximum values exclude both low and high outliers. Source: San Bernardino County Assessor Tax Records, July 2021

Rental Prices

Rental housing plays a vital role in providing housing affordable for a variety of household sizes and special needs. Rental housing serves such needs as young adults not ready for the cost or responsibilities of homeownership, seniors seeking less costly and lower maintenance dwellings, and families who benefit from the lower cost of rental housing and onsite amenities. The median contract monthly rent for the County of San Bernardino as a whole was $1,283, and $953 for 1-bedroom units, $1,188 for 2-bedroom units, $1,477 for 3-bedroom units, and $1,790 for 4-bedroom units. These median rents are generally affordable to low and moderate income households, even when adjusted for household size.

However, there are significant variations in a region as large as San Bernardino County. Table 2-20 shows the rental price for different sized units in various unincorporated communities. This table reflects rental housing that is both single family and multifamily (as shown in Table 2-13, multifamily housing reflects only five percent of all housing stock).

The median monthly rents in unincorporated communities are generally affordable to lower income households, even when adjusted for household size. Based on this information, nearly all existing rental housing in unincorporated communities can also be assumed to be affordable to moderate income households.

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The Valley region has the greatest concentration of people, jobs, and homes, the highest demand for rentals, the greatest range of housing size, and the highest median prices overall. The most affordable rental housing is in the Desert regions, where the environment, oversupply of housing relative to jobs, and higher vacancy rate drive down rents. Rents in the Mountain region is close to prices in Valley communities, due to the limited supply of housing, with supply constrained by topography, safety hazards, and the presence of seasonal homes that are not available to those seeking year-round rental housing.

Table 2-20 Median Gross Rent, Overall and by Number of Bedrooms, 2019

Area	Overall	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
COUNTYWIDE	$1,283	$953	$1,188	$1,477	$1,790
VALLEY					
Bloomington	$1,240	$825	$967	$1,376	$1,414
Mentone	$1,067	$975	$1,174	$1,155	$1,467
Muscoy	$1,335	$1,010	$1,122	$1,417	$1,703
San Antonio Heights	$1,438	-	$1,163	$1,631	-
MOUNTAIN					
Big Bear City	$1,113	$681	$1,090	$1,384	$2,201
Crestline	$1,007	$786	$1,172	$1,207	$1,425
Lake Arrowhead	$1,123	$657	$1,042	$1,723	$1,676
Lytle Creek	$1,372	-	$1,403	-	-
Oak Glen	-	-	-	-	-
Running Springs	$1,215	$925	$1,156	$1,330	$2,083
Wrightwood	$1,030	$710	$938	$1,382	-
NORTH DESERT					
Baker	$670	$593	$650	$936	-
Lenwood	$943	-	-	$937	-
Lucerne Valley	$908	$683	$812	$940	$1,081
Oak Hills	$1,312	-	-	$1,029	-
Phelan	$1,109	$442	$870	$1,224	$1,808
Spring Valley Lake	-	-	-	$1,673	$1,778
Trona	-	-	-	-	-
EAST DESERT					
Joshua Tree	$896	$767	$851	$1,222	$1,375
Morongo Valley	$899	$504	$745	$1,227	-

Source: American Community Survey, 2019 5-Year Estimates

2.2.6 HOUSING PROBLEMS

Housing problems typically refer to households that spend too much of annual household income toward housing (overpayment) or double up in a unit to share the cost (overcrowding). Both situations have significant implications for households, the housing unit occupied, and the neighborhood where these conditions occur. The following describes the prevalence of overcrowding and overpayment in the unincorporated areas of the County.

Housing Overcrowding

Housing overcrowding is when too many people of the same household live in the same house, measured by the number of occupants per room—excluding hallways, bathrooms, and closets. Several undesirable conditions are associated with overcrowding. Accelerated deterioration of the home, overtaxed plumbing facilities, and parking problems often occur when too many people share one living space. These conditions detract from the quality of a housing development, result in lower project values, and therefore are a considerable concern to local governments.

Table 2-21 contains data regarding housing overcrowding in the unincorporated area. According to the federal government standards, a household is considered overcrowded if there is more than 1.0 person per habitable room. By way of example, a typical two-bedroom apartment with a living room and kitchen (a total of four rooms) would be considered overcrowded if more than four occupants lived in the housing unit. If an average of more than 1.5 persons per habitable room lived in the same dwelling unit, the unit would be classified as having severe overcrowding.

The data show that overcrowding is not prevalent in the unincorporated areas. An estimated 12% of renter households reported more than one occupant per room, and only 6% of owner-occupied units reported overcrowded conditions. Overall, overcrowded housing conditions occurred in approximately 8% of all unincorporated households. In general, existing housing units in the unincorporated county communities appear to be appropriately sized for the majority of households, regardless of tenure.

Overcrowding is more prevalent in rental households due to a number of reasons. Lower income households may increase in size without increasing household income (e.g., adding another child or elderly parent). Such a household may not be able to afford a housing unit with more rooms, which often causes them to remain in their current home. Additionally, the market for rental units with three or more bedrooms is fairly small across the county, which discourages the development of new, large housing units and thus creates a small number of large units available for rent.

Table 2-21 Housing Overcrowding, 2019

Overcrowding Characteristics (# occupants per habitable room)	Renter Occupied		Owner Occupied	
	Households	% of Total	Households	% of Total
Total households	32,247	100%	62,979	100%
Total Overcrowding (More than 1.0)	4,001	12%	3,760	6%
Some Overcrowding (1.01 to 1.50)	2,894	9%	2,601	4%
Moderate Overcrowding (1.51 to 2.0)	1,019	3%	829	1%
Severe Overcrowding (More than 2.0)	88	<1%	330	<1%

Source: American Community Survey, 2019 5-Year Estimates

Household Overpayment

A primary goal for communities is the provision of decent housing and a suitable living environment for residents of all economic levels. Overpaying for housing can significantly burden a household. These households are likely challenged to afford other basic needs and could face eviction, foreclosure, or overcrowding to reduce the cost burden.

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Overpayment is typically defined as spending more than 30% of a household's monthly gross income for housing. Moderate and upper-income households may, and often do, expend more than 30% of their incomes for housing while still having the ability to pay for basic necessities with the balance of their income. Moderate overpayment refers to spending 30% to 50% of income on housing, and severe overpayment refers to spending more than half of a household's gross income toward housing costs.

Table 2-22 lists the prevalence of overpayment by renter households and Table 2-23 lists the prevalence of overpayment by homeowner households in the unincorporated area. Overpayment is much more common than overcrowding. Approximately 36% of all households spend more than 30% of their monthly income on housing, with 58% of renter households and 26% of mortgage-holding owner households overpaying for housing. Additionally, over a quarter (28%) of renter households spend more than 50% of their monthly income on housing.

Although overpayment affects all economic levels, owners are in a different situation than renters. Homeowners may overextend financially to purchase a home, but they maintain the option of selling the home and realizing tax benefits or appreciation in value. Renters are limited to the rental market and are generally required to pay the rent established by that market. Rent overpayment is more often due to a lack of income, while homeowner overpayment is due more to the high price of single-family housing and the preference to become or stay a homeowner.

Table 2-22 Housing Overpayment for Renter Households, 2018

Overpayment Characteristics (rent as a % of income)	Renter Household Income									
	Less than $20,000		$20,000 to $34,999		$35,000 to $49,999		$50,000 to $74,999		$75,000 or greater	
	#	%	#	%	#	#	%	#	%	#
Total households	6,850	100%	6,081	100%	5,416	100%	5,408	100%	6,874	100%
No overpayment (<20%)	60	1%	152	2%	417	8%	1,152	21%	4,907	71%
No overpayment (20% to 29%)	141	2%	415	7%	1,350	25%	2,571	48%	1,750	25%
Overpayment (30% to 49%)	1,012	15%	2,886	47%	3,215	59%	1,665	31%	208	3%
Severe Overpayment (>50%)	5,637	82%	2,628	43%	434	8%	20	0%	9	0%

Note: Table lists rental households for which income data is available (30,629). Source: American Community Survey, 2018 5-Year Estimates

Table 2-23 Housing Overpayment for Ownership Households, 2018

Overpayment Characteristics (rent as a % of income)	Ownership Household Income									
	Less than $20,000		$20,000 to $34,999		$35,000 to $49,999		$50,000 to $74,999		$75,000 or greater	
	#	%	#	%	#	%	#	%	#	%
Total households	7,992	100%	8,166	100%	7,318	100%	11,937	100%	26,777	100%
No overpayment (<20%)	4,791	60%	4,258	52%	2,994	41%	5,011	42%	18,531	69%
No overpayment (20% to 29%)	19	0%	293	4%	1,047	14%	3,176	27%	6,076	23%
Overpayment (>30%)	3,182	40%	3,615	44%	3,277	45%	3,750	31%	2,170	8%

Note: No overpayment ownership includes ownership households without a mortgage. Source: American Community Survey, 2018 5-Year Estimates

2.3 SPECIAL NEEDS GROUPS

2.3.1 ELDERLY PERSONS

The special housing needs of seniors are an important concern since many retired persons are likely to be on fixed low incomes. In addition, seniors maintain special needs related to housing construction and location. Seniors often require ramps, handrails, and lower cupboards and counters to allow greater access and mobility. They also may need special security devices for their homes to allow greater self-protection. In terms of location, because of limited mobility, seniors also typically need to have access to public facilities (e.g., medical and shopping) and public transit facilities. The County of San Bernardino is committed to addressing the special needs of senior citizens and offers a variety of resources and housing programs to meet these needs.

It is estimated that in 2019, approximately 14 percent of the unincorporated area population was 65 years of age or older (41,760 persons). Approximately 23,945 seniors were householders and represented 25 percent of all households in the unincorporated county. Of those households, approximately 20,128 were owner occupied and 3,817 were renter occupied. Table 2-24 provides additional breakdowns for the unincorporated county.

Elderly persons are often retired and live off of limited income derived from pensions (or other retirement vehicles) and/or social security income. Elderly persons that live in ownership households frequently have little to no mortgage costs and their limited income allows them to purchase basic necessities. So, while approximately 52% of elderly homeowners earn low incomes, many of these households are not at risk of overpayment. However, approximately 77% of elderly renter households earn low incomes and, because they have ongoing housing costs, are at greater risk for overpayment and being unable to pay for other expenses. Table 2-25 presents additional breakdowns for the unincorporated county. Providing rental assistance where needed, housing rehabilitation assistance for homeowners, and other programs can assist seniors to meet their housing expenses.

Many seniors reside in conventional single family homes in the unincorporated county. However, providing appropriate housing designed for seniors is increasingly important. As this group ages, many may seek different types of senior housing, from smaller condominiums to independent or assisted age-restricted housing. In addition to housing, an appropriate mix of affordable support services (e.g., transportation, health care, home maintenance) provided locally can help seniors live as independently as possible. Based on proximity to such services, almost all retirement facilities and age-restricted apartments are located in incorporated cities and towns throughout the county. Some age-restricted apartments available for seniors in unincorporated communities include:

- **Lillian Court.** This development is reserved for those aged 55 and older, offering 70 affordable one-bedroom apartments in Bloomington. Lillian Court was developed in conjunction with the first phase of Bloomington Grove and the construction of the Bloomington Public Library.

- **Sunset Village Apartments.** This apartment complex in Joshua Tree offers 16 affordable and 17 market rate rental units for seniors. Constructed in 1987, the 16 units in this project are eligible to convert to market rate in 2026 (at-risk analysis discussed in Section 2.4).

- **Grandview Apartments.** This development in Twin Peaks offers 40 affordable units for seniors. Built in 1996, the project is owned by the County Housing Authority.

According to the State Department of Finance's population projections, the senior population in all of San Bernardino County (incorporated and unincorporated) in 2029 is projected to be substantially larger compared to 2019 (386,000 vs 264,000). If this projection proves valid for the unincorporated areas, the demand for a variety of senior housing options will also increase. In addition to traditional facilities that offer independent living units, it is likely that the demand for intermediate care and assisted living will also increase, as well as the demand for facilities offering a full range of living arrangements. The County maintains a Density Bonus Ordinance in compliance with state law that provides regulatory incentives for senior citizen housing developments.

Table 2-24 Householders by Age and Tenure, 2019

Householder Age	Renter Occupied		Owner Occupied		Total Households	
	Households	% of Total	Households	% of Total	Households	% of Total
Total households	32,247	100%	62,979	100%	95,226	100%
Under 65 years	28,430	88%	42,851	68%	71,281	75%
65 to 74 years	2,528	8%	12,047	19%	14,575	15%
75 years or older	1,289	4%	8,081	13%	9,370	10%

Source: American Community Survey, 2019 5-Year Estimates

Table 2-25 Elderly Households by Income and Tenure, 2016

% of HUD Area Median Family Income (HAMFI)	Renter Occupied		Owner Occupied		Total Households	
	Households	% of Total	Households	% of Total	Households	% of Total
Total households	2,545	100%	14,095	100%	16,640	100%
< 30% HAMFI	799	31%	1,882	13%	2,681	16%
30% to 50% HAMFI	691	27%	2,318	16%	3,009	18%
50% to 80% HAMFI	458	18%	2,470	18%	2,928	18%
80% to 100% HAMFI	142	6%	1,575	11%	1,717	10%
> 100% HAMFI	455	18%	5,850	42%	6,305	38%

Note: HAMFI is generally equal to area median income (AMI). Source: HUD CHAS, 2012–2016

2.3.2 LARGE HOUSEHOLDS

Large households are included as a special needs group because they require larger dwellings with more bedrooms. These households typically have the highest cost burdens. This is especially true for renter households, because multifamily rental units are typically smaller than single-family units. In unincorporated San Bernardino County, approximately 20,691 households had five or more persons

(18% of all households) as of 2019. Of these households, about 41 percent were renters and 59 percent were owners.

As of 2019, there are an estimated 64,267 occupied housing units with three or more bedrooms in the unincorporated county, which represents over two-thirds of all households. Over three quarters (77%) of owner households and nearly half of renter households live in units with three or more bedrooms. Combined with the low rates of overcrowding presented in Table 2-21, this data indicates that there are few significant issues with larger households finding adequately sized housing units. The ability of to build single family homes at a very low cost enables unincorporated residents to construct and/or acquire housing with enough room for their entire household. However, larger households may need to spend more than 30% of their income to live in a larger housing unit, as evidenced by the higher rates of overpayment in Tables 2-22 and 2-23.

2.3.3 SINGLE-PARENT HOUSEHOLDS

Single-parent households are households led by a single male or female with one or more children under the age of 18 at home. These households' living expenses generally take up a larger share of income than is the case in two-parent households. Therefore, finding affordable, decent, and safe housing is often more difficult for single-parent households. Additionally, single-parent households have special needs involving access to daycare or childcare, healthcare, and other supportive services.

In unincorporated San Bernardino County, there were an estimated 11,390 single-parent households (12% of all households) as of 2019, with 7,651 headed by single women and 3,739 headed by single men. Of the 7,651 single-parent households headed by single women, approximately 3,140 households (40%) experience poverty. Single-parents households headed by single men experienced lower rates of poverty, with 736 households out of 3,739 (20%) experiencing poverty.

More affordable housing options for single-parent households can be found in manufactured homes and accessory dwelling units, which are a focus of Programs 3 and 11 in the County's Housing Strategy. Both can offer more cost effective (manufactured based on construction technology and ADUs based on size and the ability to be placed on already developed property), and ADUs may be more likely to be near daycare, healthcare, and other supportive services in the Valley region.

2.3.4 PERSONS WITH A DISABILITY

Physical and developmental disabilities can hinder access to housing units of traditional design. Examples of housing design features that may be needed to accommodate persons with disabilities include level entries, wider doorways, larger bathrooms, lever-style door handles, hand-held showerheads, lower kitchen counters, and pull-out shelves. To meet the special needs of disabled residents, the County operates programs for home repair, rental assistance, and improving accessibility.

As of 2019, between 23,000 and 78,000 individuals (8% to 27% of total population) living in the unincorporated county reported a limitation. A range is provided because a person may report one or more disabilities. The breakdown in population by type of limitation is shown in Table 2-26. Rates of

disability by age group are not unusual, with those under age 18 experiencing extremely low rates of disabilities, those age 18 to 65 experiencing very low rates of disabilities, and those over the age of 65 experiencing higher rates of disability.

For those age 18 to 65, disabilities can affect their ability to work and earn income or save for retirement. Approximately 7,300 individuals who are actively in the workforce (employed and unemployed) reported a disability (7% of workforce). In elderly residents, their physical and cognitive abilities begin to decline naturally due to aging, resulting in a diminished capacity to take care of themselves and live independently.

Table 2-26 Disability by Type and Age, 2019

Disability Type	Under 18		18 to 65		Over 65		Total	
	#	% of Total Pop	#	% of Total Pop	#	% of Total Pop	#	% of Total Pop
Hearing	429	<1%	3,947	2%	6,890	17%	11,266	4%
Vision	453	<1%	4,143	2%	3,102	7%	7,698	3%
Cognitive	1,599	2%	8,449	5%	4,312	10%	14,360	5%
Ambulatory	432	<1%	11,541	6%	11,079	27%	23,052	8%
Self-care	530	<1%	4,678	3%	3,663	9%	8,871	3%
Independent living	n/a	n/a	7,766	4%	6,660	16%	14,426	5%

Source: American Community Survey, 2019 5-Year Estimates

Persons with Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, "developmental disability" means a disability that originates before an individual attains 18 years of age, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. It includes intellectual disabilities, cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with intellectual disabilities but does not include other conditions that are solely physical in nature.

Many developmentally disabled persons can live and work independently in a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment that provides medical attention and physical therapy. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services currently provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers. The Inland Regional Center is one of the regional centers in the state of California and provides point of entry to services for people with developmental disabilities. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

The information in Table 2-27 from the California Department of Developmental Services provides more details about the disabled population in unincorporated San Bernardino County. As shown in the table, approximately 1,900 persons in the listed zip codes are served by the Inland Regional Center. This is approximately 0.6 percent of the total population of the unincorporated areas of the county. It should be noted that there are only approximately 135 residents served by the Inland Regional Center that reside in zip codes (first seven listed in Table 2-27) that cover exclusively unincorporated lands. The remaining zip codes listed cover are where at least 50% of the land is unincorporated. Not shown are the roughly 6,200 residents that reside in zip codes where less than 50% of the land is unincorporated (generally no more than 10% in terms of area where residents live). Accordingly, the 1,900 figure is considered a sufficiently accurate estimate of unincorporated residents that are served by the Inland Regional Center.

Persons with developmental disabilities can live and work independently or with support within a conventional housing environment. County efforts to provide housing for persons with disabilities consider the need to provide a continuum of housing types for persons with disabilities that provides them with opportunities to live in the most integrated setting, and not in segregated housing or communities. Housing opportunities include market-rate and affordable housing (single family and multifamily) without supports; shared housing; housing with individualized supports, such as supported living services or independent living services; supported housing with services available through the housing provider on- or off-site; group housing; and licensed housing for individuals with greater service needs.

The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the considerations that are important in serving this special needs group. Incorporating "barrier-free" design in all new multifamily housing (as required by state and federal fair housing laws) is especially important in providing the widest range of choices for persons with developmental disabilities.

The County addresses the housing needs of persons with disabilities by allowing a variety of housing types. For example, the County Development Code considers licensed care facilities (serving six or fewer persons) as a residential use that is permitted by right in all residential zones, while licensed care facilities for seven or more persons are permitted in the RL and RS zones with the submittal of a request for major reasonable accommodation and in the RM zone and multiple commercial zones with a minor or conditional use permit. Furthermore, the County adopted Ordinance 4169 (2012) and Ordinance 4230 (2014) to provide people with disabilities with reasonable accommodation in rules, policies, practices, and procedures necessary to ensure equal access to housing, pursuant to state and federal fair housing laws and the State Housing Element Law.

Table 2-27 Developmentally Disabled Residents by Place of Residence and Age, 2021

Zip Code	By Place of Residence							By Age		
	Home of Parent/ Family/Guardian	Independent or Supported Living	Community Care Facility	Intermediate Care Facility	Foster/Family Home	Other	Total	17 and younger	18 and older	Total
92317	5	0	0	0	0	0	**5**	0	5	**5**
92325	52	5	0	0	0	5	**62**	21	35	**56**
92341	5	0	0	0	0	0	**5**	5	0	**5**
92352	33	0	5	0	5	0	**43**	18	18	**36**
92378	5	0	0	0	0	0	**5**	5	5	**10**
92391	5	5	5	0	0	0	**15**	5	5	**10**
92301	338	26	36	0	22	5	**427**	191	232	**423**
92308	304	28	28	5	5	5	**375**	164	214	**378**
92316	252	5	26	0	5	5	**293**	131	163	**294**
92322	5	0	0	0	0	0	**5**	5	5	**10**
92359	51	5	5	0	5	0	**66**	32	29	**61**
92407	527	27	29	0	17	5	**605**	318	286	**604**
Total	**1,582**	**101**	**134**	**5**	**59**	**25**	**1,906**	**895**	**997**	**1,892**

Note: A value of "5" is provided when the data reported a value of "<11" to generate an estimate of the totals for each zip code and column.
Source: California Department of Developmental Services, Quarterly Consumer Reports, August 2021

2.3.5 PERSONS EXPERIENCING HOMELESSNESS

Every January, San Bernardino County conducts a count of those experiencing homelessness; the most recent available data is for the count completed in January 2020 (COVD-19 restrictions prevented an annual count in 2021). While the size of the homeless population may change throughout the year, the primary purpose of the count is to estimate how many homeless people are in San Bernardino County in general on any given day and gain demographic information about those experiencing homelessness. An interview or observational survey, or both, could be chosen by surveyors, based on the situation during the counts. Ideally, every person would be interviewed, but obviously this was not always possible because of safety concerns, language barriers, refusal, etc. Therefore, some counts also provided demographic information about the adults counted related to location (whether a person was counted on the streets or in a residential facility that serves people experiencing homelessness), age, gender, ethnicity, and state of birth.

For an unincorporated area, it can be especially difficult to accurately evaluate the number of people experiencing homelessness who associate their temporary location with an unincorporated area. First, most social and government services, basic retail stores, and food establishments are located outside of unincorporated areas, creating little reason for persons experiencing homelessness to locate in any semi-permanent fashion in unincorporated areas. Additionally, outside of the Valley region, the unincorporated communities are often far from any incorporated city or town (in some cases dozens or even hundreds

of miles away), with weather and topography that makes surviving even one or two days without assistance extremely difficult. According to the 2020 count, there were approximately 159 adults and children experiencing homelessness on any one day in unincorporated San Bernardino County, with 147 of these unsheltered. The breakdown of where (and how many) people experiencing homelessness were found is as follows: Mountain region: Big Bear City/Sugarloaf/Running Springs (13), Crestline (22); Valley region: Bloomington (19), Muscoy (24); East Desert region: Joshua Tree (59 (5 sheltered)), Landers (2), Morongo Valley (5 all sheltered); North Desert region: Phelan/Pinon Hills (2); and countywide or unknown (18). The 2022 PIT count documented fewer homeless individuals in unincorporated areas, broken down as follows: Mountain Region: Big Bear City/Sugarloaf/Running Springs (8), Crestline (13); Valley region: Bloomington (11), Muscoy (13); East Desert region: Joshua Tree (28), Landers (4), Morongo Valley (0); North Desert region: Phelan/Pinon Hills (1); and countywide or unknown (18).

Countywide, according to the 2022 PIT, there were approximately 3,333~~125~~ adults and children experiencing homelessness on any one day, with 2,389~~0~~ of these unsheltered. Countywide, roughly three-quarters (79~~2~~%) of unsheltered adults were male and children were generally equally male and female. An estimated ~~695~~ 1,027 (~~691~~ 1,025 adults and ~~4~~2 children) out of the total of 2,389~~0~~ unsheltered individuals were documented as chronically homeless. The definition of chronically homeless is complex but can be generally understood to be a person that has experienced homelessness for a total of 12 months or more in the past one to three years. In comparison, about 27~~9~~% of adults reported that this was the first time they had experienced homelessness. Approximately ~~20~~15% of adults reported that they had been diagnosed with a life-threatening chronic health condition.

The San Bernardino County Homeless Partnership, which was formed to provide a more focused approach to issues of homelessness within the county, manages the Continuum of Care system. The system is based on four components:

- safe shelter through a homeless shelter or a motel voucher
- transitional housing
- social services such as substance abuse treatment, mental health services, and independent living skills
- permanent housing and homelessness prevention service

The San Bernardino County Homeless Partnership was formed in 2007 to administer federal grants and lead the County's coordinated strategy on homelessness. It provides leadership in creating a comprehensive countywide network of service delivery to the homeless and near homeless families and individuals through facilitating better communication, planning, coordination, and cooperation among all entities that provide services and/or resources for the relief of homelessness in San Bernardino County. Through the Homeless Partnership, the County manages and administers the following:

- Continuum of Care grants, including the Homeless Housing, Assistance and Prevention Program, Continuum of Care Competition, and Homeless Emergency Aid Program

- Homeless Provider Network, which provides a forum and environment where collaborative public and private programs collaborate to improve the current delivery of services and fill identified gaps in services to the homeless and those at-risk of becoming homeless in the county. The Network meets on a monthly basis and includes partners from public, private, and non-profit service providers; community and faith-based organizations; and housing organizations serving county residents.

- Regional Steering Committee Meetings held quarterly (at a minimum), with separate committees for the desert, mountain, central valley, east valley, and west valley subregions.

- Interagency Council on Homelessness, which is the policy making body for the Homeless Provider Network and includes elected and County officials and representatives from the Network.

- Homeless Management Information System, which is a coordinated system of computers that enable service, shelter, and housing providers in different locations across the county to collect and share information about the homeless individuals and families seeking services. This system allows users (service providers, agencies, etc.) to collect and store information that can be used to improve service delivery for their consumers as well as generate required reports for different funding sources, including the Annual Performance Report for HUD.

In November 2020, the County embarked on the development of an annual Homeless Strategic Plan to increase the efficacy and expand the impact of the County's housing and homeless programs. The Strategic Plan encompasses four broad strategies: 1) system and policy change to address the root causes of homelessness, 2) expand homelessness prevention and housing programs, 3) create healthy communities to improve the quality of life for unsheltered individuals, and 4) continue to expand coordination between systems, increase the use of data to improve programs, and increase training opportunities for all partners. The community and stakeholder input collected during the outreach conducted between May and September 2021 is reflected in Program 10 in Section 5 of this Element.

The County Sheriff's Department in collaboration with the Department of Behavioral Health publishes a Resource Guide to provide information regarding services available at a community level. This guide describes and provide contact information for the full spectrum of needs and services for those experiencing homelessness. Table 2-28 lists the shelters available throughout the county as published in the Resource Guide.

Table 2-28 Emergency Shelters, Transitional Housing, and Motel Voucher Resources

Resource Location and Name	Resource			Population Served				Additional Notes
	Emergency Shelter	Transitional Housing	Motel Vouchers	Male	Female	Children	Families	
ALL AREAS								
Clear Water Residential		X		X	X			Transitional housing for seniors and veterans
CENTRAL VALLEY SUBREGION								
Central City Mission	X	X		X				Food, clothing, shelter, and transitional housing
Family Services Association			X				X	Rental assistance program, emergency shelter vouchers, and food services
Frazee Community Center	X			X		X		Shelter and referral services to other shelters, motel vouchers, and food and medical services
County Homeless Program	X	X		X	X	X	X	Serves individuals living with mental illness
Inland Temporary Homes	X	X		X	X	X	X	Emergency shelter and transitional housing
Mary's Mercy Center		X			X	X		Food, clothing, and transitional housing
Mercy House		X		X	X	X	X	Cold weather shelter vouchers
Operation Grace	X	X			X	X		Cold weather shelter vouchers
Salvation Army	X				X	X	X	Homeless shelters and shelter vouchers
Time for Change	X	X			X	X		Shelters and supportive services
Veronica's Home of Mercy		X			X	X		Transitional housing
WEST VALLEY SUBREGION								
Foothill Family Shelter		X			X	X		Transitional housing
Hope Partners			X					Food, shelter, and supportive services
Mercy House		X		X	X	X	X	Cold weather shelter vouchers
DESERT REGION								
Desert Manna	X			X	X	X	X	Cold weather shelter to the homeless
Family Assistance Program		X			X	X	X	Transitional housing and advocacy services
High Desert Homeless	X	X		X	X	X	X	Food, clothing, showers, personal care items, and shelter through motel vouchers
Life Community Development		X		X	X	X	X	Transitional housing and supportive services
New Hope Village		X		X	X	X	X	Transitional housing and supportive services
River's Edge Men's Ranch		X		X				Transitional housing and supportive services
Salvation Army	X			X	X	X	X	Homeless shelters and shelter vouchers
Samaritan's Helping Hand		X	X	X	X	X	X	Food, utility assistance, rental assistance, transitional housing, and supportive services
Set Free Christian Fellowship	X			X	X	X		Emergency shelter
Victor Valley Family		X		X	X	X	X	Transitional housing and supportive services
Victor Valley Rescue Mission	X	X		X			X	Food, shelter, and supportive services

Source: San Bernardino County Homeless Resource Guide

2.3.6 EXTREMELY LOW INCOME HOUSEHOLDS

Low income households, especially extremely low income households, have disproportionately more and more severe housing and supportive needs. Extremely low-income households typically have persons with special housing needs, including but not limited to persons experiencing homelessness or at risk of homelessness, persons with substance abuse problems, and farmworkers. These residents are likely on public assistance, including cash benefit, Cal-Fresh, or Medi-Cal. Many need access to safe and affordable childcare to parents to continue to work and earn adequate incomes.

Approximately 14,842 households earn less than 30% of the area median income (approximately $20,000). This represents just under 16% of all households in the unincorporated county. Of these extremely low income households, an estimated 7,992 reside in rental housing and an estimated 6,850 reside in ownership housing. These figures represent 25% of total rental households and 11% of total ownership households. Table 2-29 breaks down the data for the unincorporated areas.

Approximately 40% of extremely low income ownership households overpay for housing. The balance (60%) is likely occupied by those who are retired and have little to no mortgage costs, which gives them an ability to purchase basic necessities on their limited income. Some portion of the 40% may have been overpaying for housing at the time of the analysis through the 2019 American Community Survey but may pay off their remaining mortgage in a short period of time. Still, approximately 3,000 ownership households earn less than $20,000 per year and spend more than 30% of their income on housing.

Extremely low income households that have ongoing rental costs are at greater risk for overpayment and being unable to pay for other expenses. Nearly all (97%) such households spend more than 30% of their income on housing and most (82%) actually spend more than 50% of their income on housing. There is a positive trend occurring countywide, with the percentage of families living in poverty ($12,490 for an individual and $16,910 for two people with no children, and $21,330 for a family/household of three as of 2019). Between 2014 and 2019, the percentage of families living in poverty has declined every year from 15% in 2014 to just over 10% in 2019.

Table 2-29 Extremely Low Income Households by Tenure, 2019

	Renter Occupied		Owner Occupied		Total Households	
Householder Age	Households	% of Total	Households	% of Total	Households	% of Total
Total households	32,247	100%	62,979	100%	95,226	100%
Households with income below $20,000	7,992	25%	7,992	11%	14,842	16%
Households with income below $20,000 spending over 30% of income on housing	6,649	21%	3,201	5%	9,850	10%

Source: American Community Survey, 2019 5-Year Estimates

2.3.7 FARMWORKERS

Documenting the precise number of farms and farmworkers is difficult in San Bernardino County. According to the 2016 Agricultural Census, the entire County has approximately 1,062 farms totaling 68,228 acres, and the average farm size is 64 acres (median size is 5 acres). The market value of all agricultural products sold is $374 million for crops, of which nearly two-thirds of the value of sales ($280 million) is for livestock, poultry, and their products. Moreover, as of 2016, an estimated 4,993 acres were enrolled under Williamson Act contracts.

Farmworkers are persons whose primary incomes are earned through agricultural work. Permanent farm laborers work in the fields, processing plants, or support activities on a generally year-round basis. For certain agricultural products, the labor force is supplemented by seasonal workers during harvest periods. Farms may also hire migrant workers—those whose travel prevents them from returning to their primary residence every evening. The nature of agricultural work affects the housing needs of farmworkers. Farmworkers employed year round generally live with their families and need permanent affordable housing like other lower income households. Migrant farmworkers who follow seasonal harvests often need temporary housing.

An estimated 539 residents of the unincorporated area (0.65% of the workforce) are employed in farming occupations, and 195 full-time agricultural jobs (0.24% of jobs in the county). The 2016 Census of Agriculture notes the presence of migrant labor, but no estimates are available.

Accessory dwellings (and labor quarters) are allowed by right in both the Resource Conservation and Agricultural districts, provided the accessory use is on the same site as the agricultural use. Recreational vehicles are also allowed with a special use permit. In the Agricultural Preserve Overlay, farm labor camps and temporary trailer housing are allowed as labor quarters. The County also allows caretaker units in all zones, except Floodway and Open Space land use districts. For agricultural operations limited to three months per year, encompassing the harvest season of the agricultural product, recreational vehicles may also be used as temporary labor quarters.

2.4 HOUSING AT RISK OF CONVERSION

2.4.1 INVENTORY OF ALL ASSISTED UNITS

California law requires that all housing elements include an analysis of assisted multiple-family housing projects that are at-risk of conversion to non-low income uses. These assisted housing developments are multifamily rental housing complexes that receive government assistance under federal, state, and/or local programs. Housing that falls under this statute includes new construction assistance, rehabilitation assistance, and/or rental assistance. The analysis must verify units that are not at risk of conversion to market rents and, for those at risk of conversion, contain a detailed analysis and plan for the preservation of the at-risk affordable housing units.

Although public assistance is a critical means for financing the construction and rehabilitation of housing, the affordability of the housing oftentimes lasts for only a few decades or less. The reasons why publicly

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assisted housing might convert to market rate include expiring subsidies, mortgage prepayment by the property owner, and/or the expiration of affordability restrictions. Affordable housing is also most likely to convert to market rents during inflationary times because market rents are increasing much faster than subsidized rents, which provides the owner with a greater financial incentive to convert the project to non-low income uses.

The County of San Bernardino Economic Development Agency, Community Development and Housing Agency, and Department of Behavioral Health have and/or will have funded a significant number of affordable housing units. This includes assistance to dozens of apartment projects the provide over a thousand units affordable to lower income households and several thousand apartment units under control of the County Housing Authority that provide housing units affordable to lower income households. In keeping with the County's approach to targeting affordable housing where the greatest housing needs exist relative to employment centers, the vast majority of projects are in cities.

Table 2-30 provides a summary of publicly subsidized units only in the unincorporated area of San Bernardino County (listed in order of conversion date), followed by a brief description of each development.

Table 2-30 Assisted Multifamily Units in Unincorporated County Areas

Project	Occupant	# Bedrooms			Affordable		Year Built	Financing	Potential Conversion Date
		1	2	3	Units	% AMI			
Las Terrazas Apts 1176 W Valley Blvd Colton	Family	39	40	33	112	20% & 80%	2022 (est.)	LIHTC, NPLH, HOME	2077
Bloomington Grove III 18030 Valley Boulevard Bloomington	Family	13	59	26	98	30% to 50%	2022	LIHTC, Sec 8	2077
Bloomington Grove II 18026 Valley Boulevard Bloomington	Family	8	44	32	84	30% to 50%	2016	LIHTC, Sec 8	2071
Bloomington Grove I 18026 Valley Boulevard Bloomington	Family	-	4	32	36	30% to 50%	2016	LIHTC, Sec 8	2071
Bloomington Grove I /Lillian Court 18030 Valley Boulevard Bloomington	Senior	70	-	-	70	30% to 50%	2016	LIHTC, Sec 8	2071
Yucca Trail Apartments 451 Verbena Joshua Tree	Family	4	46	-	50	Up to 50%	1987	USDA Section 515 & 521	2067
Quail Trail Apartments 310 Sunrise Trail Havasu Lake	Family	6	4	-	10	Up to 30%	2012	USDA Section 515 & 521	2042
Sunset Village Apartments	Senior	33	-	-	16	Up to 50%	1987	USDA Section 515	2026

Table 2-30 Assisted Multifamily Units in Unincorporated County Areas

Project	Occupant	# Bedrooms			Affordable		Year Built	Financing	Potential Conversion Date
		1	2	3	Units	% AMI			
6036 Sunset Road Joshua Tree									
Desert View Apartments 57535 Death Valley Road Baker	Family	-	8	3	11	30% to 60%	2002	HOME	Perpetuity (County owned)
Grandview Towers 707 Grandview Twin Peaks	Senior	29	11	0	40	Up to 50%	1996	HOME, Sec 8	Perpetuity (County owned)
Mentone Apartments 1232 Crafton Avenue Mentone	Family	12	14	8	34	Up to 30%	1991	HOME, Sec 8	Perpetuity (County owned)
Searles Apartments 13400 Athol Street Trona	Family	24	32	-	54	Up to 30%	1979	USDA Section 515 & 521	Perpetuity (Property Input)

Source: County of San Bernardino

- **Las Terrazas Apartments.** This family apartment complex consists of 110 affordable units (plus two manager units), a community building, and a childcare building, with all buildings constructed on a six-acre site in the unincorporated Colton sphere of influence. The community building serves as a gathering place for events and onsite services while the childcare building contains classrooms and 4,000 square feet of open space. Thirty units will be designated for the homeless living with a mental disability at or below 20% AMI, with the balance set aside for households earning at or below 80% AMI, along with two manager units.

- **Bloomington Grove (Phases I, II, and III).** Over three phases of development, Bloomington Grove offers a total of 217 affordable family apartments (plus one manager's unit), including 10 for County Department of Behavioral Health clients and 10 for Inland Empire Health Plan members. The first phase also included the construction of the Bloomington Public Library onsite. Alongside the third phase is the creation of a 7,700 square foot community center and the County's relocation and improvement of Ayala Park (directly adjacent and accessible all three phases).

- **Lillian Court.** This development is reserved for those aged 55 and older, offering 70 affordable one-bedroom apartments in Bloomington. Lillian Court was developed in conjunction with the first phase of Bloomington Grove and the construction of the Bloomington Public Library.

- **Yucca Trail Apartments.** This apartment complex in Joshua Tree offers 49 affordable family units (plus one manager's unit). While the development was built in 1992, the project received a $2.5 million bond from the California Municipal Financing Authority in 2012 to finance the acquisition, rehabilitation, and long-term affordability (55 years) of the project.

- **Quail Trail Apartments.** This apartment complex in Havasu Lake (on tribal land) offers 10 affordable rental units. Completed in 2012, this project will remain affordable for 30 years. Quail Valley Apartments is not at risk of conversion to market rate until 2042.

- **Sunset Village Apartments.** This apartment complex in Joshua Tree offers 16 affordable and 17 market rate rental units for seniors. Constructed in 1987, the 16 units in this project are eligible to convert to market rate in 2026. The property owner was contacted and indicates that they intend to extend affordability through at least 2037 (loan payoff year).

- **Desert View Apartments.** This development in Baker offers 11 affordable rental units. Built in 2001, Desert View Apartments was initially funded with County HOME funds. In 2002, the County Housing Authority obtained additional project-based vouchers to maintain the project's affordability through 2022. The project is owned by the County Housing Authority and is not considered at risk of conversion.

- **Grandview Apartments.** This development in Twin Peaks offers 40 affordable units for seniors. Built in 1996, the project received County HOME funds. The County Housing Authority subsequently obtained and dedicated additional project-based vouchers to maintain the project's affordability in perpetuity. The project is owned by the County Housing Authority and is not considered at risk of conversion.

- **Mentone Apartments.** This development in Mentone offers 34 affordable units for families. Built in 1991, the project was financed through HCD's Rental Housing Construction Program. By 2012, when the affordability covenant period had nearly expired, the County Housing Authority obtained project-based vouchers to maintain the affordability of all 34 units. The project is owned by the County Housing Authority and not at risk of conversion.

- **Searles Apartments.** This complex in Trona offers 56 affordable family units. Originally built in 1979, the covenant expired in 2009. However, according to the property manager, the intent is to keep the project affordable in perpetuity as HUD guaranteed subsidies exceed the market rent (which is affordable to low income households). With this input from the property owner and the fact that HUD subsidies exceed the market rent, the County does not consider this property to ~~Therefore, the project is not~~ at risk of conversion.

2.4.2 ANALSYIS OF UNITS AT RISK OF CONVERSION

Units at Risk

Only 16 units in the Sunset Village Apartments in Joshua Tree are currently at risk of converting to market rate by 2031. The development's 33 units are all 1-bedroom, 672-square foot units in a gated-community reserved for those age 50 or older. Based on the gated-community's age-restriction, the households are assumed to consist exclusively of one or two people, with the majority of units assumed to be one-person households. The income-restricted units rent for $740 per month (50% rent limit) as

dictated by USDA Section 515 program requirements. The property owner also intentionally rents the market-rate units for $740 per month in part to avoid stigma with income-restricted units.

Strategies to Preserve Affordable Housing - Preservation

Housing affordability can also be preserved by seeking alternative means of subsidizing rents, such as the Section 8 Housing Choice Voucher program. Under Section 8, HUD pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fair-market rent on the unit. The fair market rent for one-bedroom units in the Riverside-San Bernardino-Ontario subregion is $1,106 and the 50% rent limit is $740, according to HUD as of June 2021. Based on this information, the monthly subsidy per unit is $366 per month, or $5,856 for the entire development. The cost to subsidize rental costs for a very low-income household for 20 years would be $7,320 per unit or $117,120 for the entire development.

Strategies to Preserve Affordable Housing - Acquisition

Only one comparable housing development was found in the area: Cherokee Trail Apartments in Yucca Valley. This 20-unit development consists entirely of one-bedroom units that currently rent for $925 per month (per trulia.com, visited in April 2022). The monthly subsidy in the local area, therefore, may be closer to $185 per unit or $6,105 for the entire development. The Cherokee Trail Apartments development is currently for sale at $3 million or $150,000 per unit (loopnet.com, April 2022). The only other comparable found is a 20-unit development (actually two multifamily unit developments to be sold as one portfolio), in Indio in Riverside County, which is currently listed for $2.55 million or $127,500 per unit (loopnet.com, April 2022). Based on this information, the cost to acquire the 16 units in Sunset Village in Joshua Tree could range between $2.0 and $2.4 million.

Strategies to Preserve Affordable Housing - Replacement with New Construction

Another option for replacing the 16 at-risk units is through new construction. The cost to replace the units will vary based on timing of replacement and economic conditions in the region. A 2021 survey conducted by the City of Twentynine Palms of multiple housing developers that build affordable units in the nearby desert area determined that the average construction cost for affordable units is approximately $317,074 per unit. Based on this estimate, the cost of replacing the at-risk units through new construction is approximately $5.1 million.

In March 2020, the Terner Center reported that multi-family construction costs average approximately $222 per square foot. Applied to the 672-square foot units in Sunset Village, the cost per unit for construction would be roughly $149,000 per unit. While Sunset Village is on an 8.21-acre site, the development only occupies about 4 acres (including all circulation and facilities). Land in the area is currently selling for $36,000 to $166,000 per acre (loopnet.com, April 2022) for similarly sized parcels. Based on this information, the cost for new construction, including land, could be roughly $2.5 million.

Cost of Preservation versus Replacement

The cost to the County of preserving units projected to expire in 2031 is estimated to be far less compared to replacing the units through new construction. Actual costs involved in each option will depend on the rental and real estate market situations at the time the affordability restrictions on the project expires.

Extending low-income use restrictions to preserve the units as affordable may require financial incentives to the project owner. Other scenarios for preservation would involve purchase of the affordable units by a nonprofit or public agency, or local subsidies to offset the difference between affordable and market rents. Scenarios for preservation depend on the type of project at risk.

Funding Sources for Preservation

The types of resources needed for preserving at-risk units fall into three categories: financial resources available to purchase existing units or develop replacement units; entities with the intent and ability to purchase and/or manage at-risk units; and programs to provide replacement funding for potential reductions in funding for Housing Choice Voucher Program rent subsidies (previously known as the Section 8 Program). A variety of federal, state, and local programs are available for potential acquisition, subsidy, or replacement of at-risk units. Due to both the high costs of developing and preserving housing and limitations on the amounts and uses of funds, multiple funding sources would be required. The following summarizes federal and state financial resources available to the County for preservation of assisted, multifamily rental housing units. The resources listed below may apply to either Sunset Village or other developments that are not yet at risk of converting to market rate.

Federal Programs

Community Development Block Grant (CDBG). This program is intended to enhance and preserve the County's affordable housing stock. CDBG funds are awarded to the County on a formula basis for housing and community development activities. Eligible activities include acquisition, rehabilitation, economic development, and public services. CDBG grants benefit primarily persons/households with incomes not exceeding 80 percent of the county median family income.

HOME Investment Partnerships. HOME funding is a flexible grant program that is awarded to the County on a formula basis for housing activities that take into account local market conditions, inadequate housing, poverty, and housing production costs. The formula for determining funding amount and eligibility is based on several factors including the number of units in a jurisdiction that are substandard or unaffordable, the age of a jurisdiction's housing, and the number of families living below the poverty line. HOME funding is provided to jurisdictions to either assist rental housing or home ownership through acquisition, construction, reconstruction, and/or rehabilitation of affordable housing, as well as possible property acquisition, site improvements, and other expenses related to the provision of affordable housing and projects that serve a group identified as having special needs related to housing.

Housing Choice Voucher (Section 8) Program. This program provides rental assistance payments to owners of private market-rate units on behalf of very low-income tenants.

Section 811/202 Program. Nonprofit organizations and consumer cooperatives are eligible to receive zero-interest capital advances from HUD for the construction of very low-income rental housing for senior citizens and persons with disabilities. Project-based assistance, or capital advances, is also provided in conjunction with this program. Section 811 can be used to develop group homes, independent living facilities, and intermediate care facilities. Eligible activities include acquisition, rehabilitation, new construction, and rental assistance.

HUD Low Income Housing Preservation and Resident Homeownership Act (LIHPRHA). LIHPRHA was enacted in response to concern over the prepayment of HUD-assisted housing. When an assisted housing project pays off the loan, they are then eligible to convert to market-rate, thus resulting in a loss of affordable housing. The legislation addresses the prepayment of units assisted under Section 221(d)(3) and Section 236 (Section 236 replaced the Section 221(d)(3) program in 1968). Generally, the law facilitates the preservation of these low-income units by providing incentives to property owners to either retain their units as low income or to sell the project to priority purchasers (tenants, nonprofits, or governmental agencies.) Pursuant to LIHPRHA, HUD must offer a package of incentives to property owners to extend the low-income use restrictions. These incentives would ensure an 8% return for property owners on the recalculated equity of their property, provided the rents necessary to yield this return fall within a specified federal cost limit. The cost limits are either 120% of the fair market rate (FMR), or the prevailing rent in the local market. If HUD can provide the owner with this return, the owner cannot prepay the mortgage. The owner must either stay in the program or offer to sell the project (a "voluntary" sale) to a priority purchaser for a 12- month option period or other purchasers for an additional 3 months. The owner is required to document this choice in a plan of action. If HUD cannot provide the owner with the 8% return, i.e., the rents required would exceed federal cost limits, the owner may prepay only after offering the sale to priority purchasers for 12 months, or other qualified buyers for an additional three months (a "mandatory" sale), and filing a plan of action which demonstrates that conversion will not adversely impact affordable housing or displace tenants. According to the California Housing Partnership Corporation, most projects in California will fall within federal cost limits, except those with exceptionally high rental value or condominium conversion potential.

Projects that are preserved under either of these methods are required to maintain affordability restrictions for the remaining useful life of the project, which is defined minimally as 50 years. Despite these requirements, property owners may still be able to prepay the loan. First, the owner may prepay the property loan if no bona fide offer to purchase the property is made. Second, HUD may not provide some of the discretionary monies to priority purchasers in preservation sales. Finally, the overall success of the preservation efforts is contingent on congressional appropriation of sufficient funding to HUD.

State Programs

California Housing Finance Agency (CHFA) Multiple Rental Housing Programs. This program provides below-market-rate financing to builders and developers of multiple-family and elderly rental housing. Tax-exempt bonds provide below-market-rate mortgage money. Eligible activities include new construction, rehabilitation, and acquisition of properties with 20 to 150 units.

Low Income Housing Tax Credit (LIHTC). This program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to corporations and people with high tax liability, and proceeds are used to create housing. Eligible activities include new construction, rehabilitation, and acquisition.

California Community Reinvestment Corporation (CCRC). This private, nonprofit mortgage banking consortium provides long-term debt financing for affordable multifamily rental housing. Eligible activities include new construction, rehabilitation, and acquisition.

Nonprofit Entities. Nonprofit entities serving in the county can be contacted to gauge their interest and ability in acquiring and/or managing units at risk of conversion. For units at risk of conversion, qualified non-profit entities must be offered the opportunity to purchase buildings to maintain affordability. The following local nonprofit corporations have the legal and managerial capacity to acquire and manage at-risk units, based on their inclusion in HCD's list of Qualified Entities (as of December 2021). This list is maintained by HCD and is available on HCD's website.

- Abbey Road Inc. (North Hills)
- BUILD Leadership Development Inc. (Newport Beach)
- Century Housing Corporation (Culver City)
- Coachella Valley Housing Coalition (Indio)
- Coalition for Economic Survival (Los Angeles)
- CSI Support & Development Services (Monrovia)
- Housing Corporation of America (Laguna Beach)
- Innovative Housing Opportunities, Inc. (Irvine)
- Keller & Company (San Diego)
- L + M Fund Management LLC. (Westchester, NY)
- Neighborhood Housing Services of the Inland Empire, Inc. (San Bernardino)
- Nexus for Affordable Housing (Orange)
- Orange Housing Development Corporation (Orange)
- Poker Flats LLC (Los Angeles)
- ROEM Development Corporation (Santa Clara)
- Southern California Presbyterian Homes (Glendale)
- The East Los Angeles Community Union (Los Angeles)

2.5 REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) ALLOCATION

California law requires cities to plan for the accommodation of population and employment growth by implementing responsive housing programs. To assist in that effort, the Southern California Association of Governments (SCAG) prepares housing construction needs goals for each incorporated city/town and county as part of the Regional Housing Needs Assessment (RHNA). Total housing construction need comprises the number of housing units needed to accommodate future population and employment growth, normal vacancies and demolitions, pent-up housing demand (unique for this housing cycle), and targets for the number of affordable units.

The 2021–2029 RHNA allocates 8,832 units to the County of San Bernadino (unincorporated areas only), which includes roughly 6,000 new units based on projected growth of new households and about

2,800 new units based on pent-up demand from existing households. Table 2-31 breaks down the allocation by income category.

Additionally, while not identified by the RHNA process, state law requires jurisdictions to quantify the projected number of extremely low income households (those earning up to 30% of the area median income (AMI). One of the accepted methodologies is to presume that 50% of the allocation for very low income households qualify as extremely low income households. Based on the County's 2021–2029 allocation, there are 1,090 projected extremely low income households (50% of 2,179 rounded up).

Table 2-31 Regional Housing Needs Assessment (RHNA) Allocation, 2021–2029

Income Category	Units	Percent of Total
Very Low (up to 50% of AMI)	2,179	25%
Low (50% to 80% of AMI)	1,360	15%
Moderate (80% to 120% of AMI)	1,523	17%
Above Moderate (120%+ of AMI)	3,770	43%
TOTAL	8,832	100%

Source: Southern California Association of Governments, July 2021

2.6 FAIR HOUSING ANALYSIS

Assembly Bill (AB) 686 requires that all Housing Elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. Under state law, affirmatively further fair housing means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." AB 686 requires the County, and all jurisdictions in the state, to complete three major requirements as part of the Housing Element update:

- Conduct an AFH that includes a summary of fair housing issues; an analysis of available federal, state, and local data knowledge to identify patterns of segregation or other barriers to fair housing; and prioritization of contributing factors to fair housing issues.
- Prepare the Housing Element Land Inventory and identify sites through the lens of AFFH.
- Include a program in the Housing Element that affirmatively furthers fair housing and promotes housing opportunities throughout the community for protected classes and addresses contributing factors identified in the AFH (applies to Housing Elements beginning January 1, 2019).

2.6.1 OUTREACH

The County has been engaged in a continuous conversation with the public, community groups and other stakeholders on housing needs, issues, policies, and programs. These outreach efforts are

summarized below.

- **Consolidated Plan and Analysis of Impediments to Fair Housing.** In 2019, the San Bernardino County Community and Development and Housing Department engaged approximately 500 people through their community engagement process which included 20 stakeholder interviews, 177 attendees at public meetings, and over 300 survey responses.

- **Point-in-Time Count.** The San Bernardino County Office of Homeless Services finalized the 2020 Point-in-Time Count to better understand the characteristics and needs of people facing or experiencing homelessness (2021 count deferred due to ongoing pandemic).

- **Homeless Strategic Plan.** Between May and August 2021, the County hosted 15 stakeholder meetings, drawing over 500 participants. Two steering committee meetings (20 representatives) were held in September 2021. Attendees and representatives included target populations (veterans, youth, seniors, and individuals with lived experience), and County departments/agencies, cities, law enforcement, housing developers, faith and community based organizations, and homeless advocates.

Public comments and input obtained from the outreach process were analyzed to identify housing needs, homeless needs, and fair housing needs. The top fair housing needs identified by the community during outreach efforts were housing accessible to people with disabilities, including ongoing support services, affordable housing for individuals, families, and seniors, and addressing negativity towards affordable housing. A full discussion of the County's outreach process, including insights into general housing needs and homeless needs, can be found in section 1.2 of this document.

2.6.2 ASSESSMENT OF FAIR HOUSING ISSUES

Exclusion From Study Area

San Bernardino County spans 20,105 square miles, the largest county in the contiguous United States by area. Much of unincorporated San Bernardino County is federal lands, state lands, and tribal lands, particularly in the Mountain and Desert regions. These lands include areas like Joshua Tree National Park, San Bernardino National Forest, Marine Corps Air Ground Combat Center Twentynine Palms, and Fort Irwin. These lands, while within San Bernardino County boundaries, are not under the jurisdiction of the County. In order to focus the impact of this analysis, these areas were not considered in the following assessment of fair housing issues facing unincorporated San Bernardino County. These lands, as well as the Community Planning Areas of focus within the assessment, are shown in Figure 2-1. Please note that all figures for the assessment of fair housing issues are provided at the end of this section.

Opportunity Areas

State law requires the County to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Since 2017, the California Tax Allocation Committee (TCAC) and HCD have developed annual

maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators in an effort to provide evidence-based research for policy recommendations. This effort has been dubbed "opportunity mapping" and is available to all jurisdictions to assess access to opportunities within their community.

Access to these resources is reflected in a scoring criterion, with higher scoring indicating greater access and lower scoring as access decreases. For example, low resource areas which typically have limited access to education and economic opportunities. The pattern of opportunity areas is the result of a combination of historic actions, market forces, and individual preferences. In unincorporated areas, particularly those as large as is found in San Bernardino County, many individuals opted to live far away from urbanized areas and resources to live in areas where residential lots are larger and cheaper, access to large open spaces and the night sky is better, and governance is provided by a County entity rather than an incorporated structure. This is true even in the now urbanized Valley region, which was a more rural setting as recently as the 1980s.

As shown in Figure 2-2, the 2021 TCAC/HCD Opportunity Areas designations vary across unincorporated San Bernardino County. Areas of "low resource" occur from urbanized areas in Fontana in the Valley region to Newberry Springs and Joshua Tree in the Desert regions. Moderate and High resource areas follow a similar pattern, distributed throughout the county. There is a concentration of highest resource areas in Mountain region communities like Oak Glen and Lake Arrowhead, but these highest resource areas also extend into Phelan/Pinon Hills in the Desert region and San Antonio Heights in the Valley region.

More specifically, the communities of Bloomington, Joshua Tree, Pioneertown, Homestead Valley, Newberry Springs, Daggett, Oro Grande, Helendale, and Yermo are in low or moderate resource areas. The communities of Mentone, Lytle Creek, Crest Forest, Lake Arrowhead, Hilltop, Bear Valley, Morongo Valley, Lucerne Valley, Oak Hills, and Wrightwood are in moderate or high resource areas. The communities of Oak Glen, Angelus Oaks, and San Antonio Heights are in the highest resource areas. Lucerne Valley, Muscoy, and Phelan/Pinon Hills show the greatest range of resource areas within their communities. The distribution of resource areas reflects where the greatest concentrations of residents are located in the county. There are nine areas identified as high segregation and poverty in San Bernardino County, occurring in Muscoy and a largely unpopulated portion of a census tract between Phelan/Pinon Hills and El Mirage.

Some of the indicators identified by TCAC and HCD to determine the access to opportunities include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. These indicator scores decrease as the level of designation decreases from higher- to lower-resourced areas. Low-resource areas typically have limited access to education and employment opportunities and may have poor environmental quality. Areas of high segregation and poverty are those that have an overrepresentation of people of color compared to the County as a whole, and at least 30 percent of the population in these areas is below the federal poverty line ($26,200 annually for a family of four in 2020).

2. Community Profile

Patterns of Integration and Segregation

Related Outreach

The County received public input related to patterns of segregation, primarily as it relates to race/ethnicity and income. There are concerns about discrimination related to national origin and immigration status, particularly against people of Hispanic ethnicity. Some feel it has led to Hispanic households being concentrated into certain unincorporated communities and lacking opportunities to move into other communities. Other public input commented that what looks like racial or ethnic segregation is actually driven by income, with increasing housing prices restricting access more based on class rather than racial or ethnic lines. Communities in the Valley region are viewed as the most integrated while communities in the Mountain and Desert regions are viewed as less integrated. There was little to no public input about familial status or persons with disabilities.

Race and Ethnicity

As shown in Figure 2-3, most residents of San Bernardino County identify as White or Hispanic. Communities in the Mountain, ~~and~~ East, and North Desert regions show a predominantly White community, whereas Valley region communities, excluding Mentone and Colton's unincorporated sphere of influence (SOI), are predominantly Hispanic. The areas in the North Desert region depicted as Hispanic majority and the small unincorporated SOI of Loma Linda in the Valley Region depicted as Asian majority are less reflective of the unincorporated area and more an extension of Census block group boundaries extending from adjacent incorporated jurisdictions (these areas are also largely open expanses of unoccupied desert or hilly terrain). The dominance of non-White, Hispanic residents is more common in SCAG jurisdictions than in many areas of the state. This trend is seen in other SCAG jurisdictions such as Riverside County and Imperial County, with high concentrations of Hispanic or Latino residents in urbanized areas of these counties, and predominantly White communities in the more rural portions of these jurisdictions.

As a result of the range in demographic identities throughout the county, San Bernardino County scores a diversity index score of over 55 in much of the county, with 100 being perfect diversity, with areas in the East Desert and Mountain regions having a lower diversity index score (Figure 2-4). Block groups in the Mountain region communities and area around Pioneertown have been identified as having a significantly lower diversity index score than the rest of the county. The Mountain region communities are dominated by several resort ski and lake facilities and contain a substantial number of homes that are only uses as seasonal lodging. The area around Pioneertown is largely unpopulated and emerged as a small community after enough people opted to live full time in what was originally established in the 1940s as an Old West-themed motion picture set.

The level of diversity in San Bernardino County has increased in recent years, with notable changes being an increase in diversity in the Desert and Mountain regions of the County, particularly in unincorporated communities like Joshua Tree and Morongo Valley in the East Desert region. The diversity index scores in unincorporated San Bernardino County reflect the more rural areas of the SCAG region as a whole, such as eastern Riverside County. San Bernardino County tends to have a higher rate of diversity in both its incorporated and unincorporated communities than urbanized areas of SCAG jurisdictions.

Income

In addition to racial and ethnic variation between the Desert, Mountain, and Valley portions of the county, San Bernardino County residents report a higher median income in and around incorporated jurisdictions in the Valley region, and near resort communities in the Mountain region, as seen in Figure 2-5. In contrast, there is a lower median income in the Desert regions, where several of the more remote unincorporated communities are located. There has been an overall increase in the number of unincorporated areas that report a higher median income since 2014, reflective of trends seen in other eastern SCAG jurisdictions such as Riverside and Imperial Counties.

There appears to be a spatial pattern of increased poverty in the Desert regions, though these areas are largely unpopulated and often completely surrounded by state, federal, or tribal lands. Such areas offer few high-paying jobs and most residents in these areas fall at or below the state median income. The reason many continue to live in these areas is the low cost of housing set within or near artist communities and national parks or other large expanses of federally-controlled open space. Poverty levels are consistently low across the Valley and Mountain regions (generally between 10% and 20%) (Figure 2-6). Exceptions are concentrations of higher poverty in the unincorporated SOI of the City of San Bernardino, including the unincorporated community of Muscoy. The City of San Bernardino, including its unincorporated SOI, offers some of the lowest housing costs with immediate access to government/social services and public transit. These trends in San Bernardino County mirror those in Riverside and Imperial counties where lower-income residents reside either in the town seat with immediate access to government/social services or in outlying portions of the county where housing prices are the most affordable and proximity to large expanses of natural open space is greatest.

The median income in western jurisdictions throughout the SCAG region is higher than in eastern portions of the SCAG region. The range in median incomes in highly urbanized counties, such as Los Angeles, Orange, and Ventura, is significant, with block groups with extremely high median incomes in coastal communities, while there are more block groups with below average median incomes in inland communities. Eastern Riverside County and Imperial County reflect the income patterns found in San Bernardino County, with higher rates of poverty in rural, agricultural, and desert communities. The stark contrast between eastern and western SCAG communities and jurisdictions has persisted throughout the history of Southern California and is tied to patterns of development and the dominant industries. Rural areas in the region have extensive desert and have not typically been conducive to dense urban development and, instead, have smaller communities with lower median incomes due to a lack of proximity to jobs and economic opportunities.

Racially and Ethnically Concentrated Areas of Poverty

San Bernardino County also has a limited number of census tracts that are considered racially and ethnically concentrated areas of poverty (R/ECAP), as shown in Figure 2-7. R/ECAPs, as defined by HUD, are areas in which 50 percent or more of the population identifies as non-White and 40 percent or more of individuals are living below the poverty line. The R/ECAPs in San Bernardino County include tracts within the central part of the City of San Bernardino, the western part of the City of Highland, and the majority of the City of Adelanto. In unincorporated areas, the R/ECAP boundaries are largely

extensions of Census tract boundaries that reflect incorporated demographics and socioeconomics. Very small portions of the unincorporated SOI of the City of San Bernardino are within a R/ECAP boundary. In the R/ECAPs near Adelanto, the populated unincorporated communities of Phelan and Pinon Hills are south of Highway 138, which is outside of a R/ECAP boundary. There are no public housing projects in R/ECAP areas and there is no greater concentration of Housing Choice Voucher holders in these areas than in other areas of the county.

Racially Concentrated Areas of Affluence

While there is no regulatory definition for identifying RCAAs, HUD published an article in 2019 titled "Racially Concentrated Areas of Affluence: A Preliminary Investigation". In this article, the authors found that while "low-wealth communities of color have been thoroughly… portrayed as the most recognizable example of racial and income segregation in the United States, relatively little attention has been given to the other side of the segregation dynamic—the affluent, White community."

The authors sought to mirror the dimensions and methods that make up the R/ECAP definition and to think of both R/ECAPs and RCAAs as two ends of the same continuum. Accordingly, they defined an RCAA as a census tract in which 80 percent or more of the population is White and has a median income that is roughly double the national median (in their study $125,000 was about double the 2016 national median household income of $60,309). Using this metric, there are no census tracts that qualify as an RCAA in San Bernardino County, and few throughout the entire SCAG region, located primarily in coastal communities and jurisdictions. Some evidence of regional concentrations begins to emerge once an RCAA is defined as a census tract where both:

- the percentage of White population is 1.5 times higher than the average percentage of total White population for all census tracts in the SCAG region (48% vs 32%); and
- the median household income is 1.5 times higher than the median household income for the SCAG region ($122,268 vs $81,512).

It is important to note that this definition is consistent with methodology preferred by HCD, in which a location quotient (1.50 times higher than the average) provides better baseline of comparison across the entire SCAG region and helps to control for extreme outliers compared to a flat rate percentage (80% or greater or more than 200% higher).

Using this methodology, 7 RCAA census tracts appear in the incorporated cities of Upland, Highland, and Redlands in San Bernardino County. These jurisdictions all show a median income over $124,000 dollars, and location quotients of 1.5 in the City of Highland to 2.5 in the City of Redlands. There are no RCAAs in unincorporated San Bernardino County. Regionally, there are concentrations of RCAAs in coastal counties and some affluent pockets in Riverside County (see Figure 2-8). This trend mimics spatial patterns identified in distribution for median income and percent of non-white population, as expected for the defined criteria of a RCAA. Coastal jurisdictions tend to have larger concentrations of residents who identify as White, and higher median incomes compared to more rural jurisdictions inland, in large part due to the historical discrepancy in housing values between coastal and non-coastal communities.

Familial Status

In most areas of the county (up to 60% of the population), households were populated by married-couple families with children (Figure 2-9). Adults living alone make up a larger share of the population in more remote areas than in unincorporated areas adjacent to incorporated cities and neighboring communities. Many of these adults are retired seeking to live in a quieter place that is close to nature and offers a lower cost of living (e.g., the ability to purchase a stick-built single family home or manufactured house served by well and septic). However, while there is a slight increase near remote areas, there are no areas with a significant concentration. Adults living with a spouse make up a more significant portion of the population in San Bernardino County, particularly in more affluent communities such as Oak Glen. While the rates of adults living with a spouse are higher than that of adults living alone, the percent of the population living with a spouse is somewhat average, between 20% and 60% for much of the County. This suggests that a more common living arrangement for many communities in San Bernardino County is adults living with one or more family members as opposed to living with just a spouse or living alone. Married couple households with children are much more prevalent in San Bernardino County than single-parent or couples without children. Familial trends mirror the SCAG region closely, with higher rates of families with children located near incorporated jurisdictions and more single-adult households in rural areas.

Persons with Disabilities

According to the 2015-2019 ACS, the unincorporated community of Homestead Valley has a percent of the population that identifies as having a disability that is greater than the percentage of unincorporated San Bernardino County as a whole (Figure 2-10). Homestead Valley and surrounding unincorporated communities in the East Desert region have experienced an increase in the percentage of the population with a disability since 2014, while the unincorporated county as a whole has seen a slight decrease since that time. The communities with the lowest percentage of the population with a disability are those in the more highly urbanized Valley region. Areas in the North Desert and Mountain regions have a larger retired senior population, which tend to have higher rates of disability.

Across the SCAG region, the percentage of the population with a disability is lower in and near incorporated jurisdictions or more urbanized communities, as is found in San Bernardino County. This may be due to the larger populations in these areas, increasing the number of residents without a disability, or increased number of young persons living near urban centers, with younger residents having fewer disabilities compared to seniors. The areas with higher rates of persons with disabilities, the areas further from incorporated and urban centers, are lower cost and offer development patterns more common from decades past; both attributes are attractive to senior households that have no desire to move or sought to retire in a quieter, more natural environment. Some households also work in the more rural areas that host heavy industries such as agriculture, mining, and other employment fields that experience higher rates of injury. This trend has remained steady in the last decade, with few shifts in concentrations of persons with disabilities.

2. Community Profile

Overall, San Bernardino County reflects the disability trend seen across the SCAG region, which has higher rates of disability in rural, unincorporated areas, particularly where agriculture or manufacturing are the dominant industries, and lower rates near incorporated cities.

Access to Opportunity

Related Outreach

The County received public input related to access to opportunity were almost exclusively about environmental health. Members of the public expressed concern over residents living near existing warehouses as well as pending warehouse projects in communities like Bloomington, citing health concerns associated with truck emissions. Water quality concerns were raised in places like Hinkley and Morongo Valley, with acknowledgement of ongoing activities to provide clean water and/or purchase property.

Employment Opportunities

According to HUD's Jobs Proximity Index for the 2014 to 2017 time period, the Desert regions of San Bernardino County have significantly less access to jobs than areas in the Mountain and Valley regions (Figure 2-11). This is due to the historical nature and development pattern of San Bernardino County, where incorporated and unincorporated communities in the Valley region developed as bedroom communities, offering lower cost single family homes for those working in coastal counties. When housing became more expensive in the Valley region, residential development expanded north and east into the Desert regions. However, while the Valley region has seen a relatively large influx of businesses and job opportunities, communities in the Desert regions still consist primarily of residential neighborhoods, with employment opportunities largely limited to local service retail and education. As a result, those living in the Desert regions must often commute much further to reach places of employment.

In comparison, the average commute times for unincorporated communities ranged from 29 minutes in Valley region community of Bloomington to 46 minutes in the desert region community of Lucerne Valley). While commute times can be similar in the Mountain and North/East Desert regions, the Mountain region communities are physically closer to job options in resort areas and the highly urbanized Valley region. The steep terrain of the Mountain region, however, means commutes are longer as driving must be done on slower, windy roads. According to available 2019 Census data, only 61% percent of San Bernadino County population over age 16 is participating in the labor forces. These numbers are lower in more rural communities like Joshua Tree (46%) than in Valley region communities like Bloomington (60%), which generally corresponds with a greater number of retired households in rural areas.

When compared to the SCAG region, residents throughout San Bernardino County have a comparable commute time to work. The mean commute time in Imperial County is 22 minutes, with the next shortest being 28 minutes for Ventura County. The counties of Orange, Riverside, and San Bernardino all have mean commute times of nearly 30 minutes or more. Due in part to the additional job opportunities in urban counties, the increased commuting time is influenced by traffic congestion. This suggests that access to employment opportunities is comparable for San Bernardino County residents, from a

perspective of physical proximity to other counties in the SCAG region. Similar to the trends found in San Bernardino County, there is a higher concentration of employment opportunities in urban communities of the SCAG region than rural areas.

Educational Opportunities

According to the 2016 California Assessment of Student Performance and Progress test scores listed on School-Ratings.com, 58 schools in unincorporated San Bernardino County were ranked. Of these, only 20 schools ranked above the 50th percentile compared to other schools in the state. This ranking, however, is not comprehensive. Access to schools is evenly distributed among unincorporated communities in San Bernardino County, with more schools located in the more densely populated Valley region of the county. Figure 2-12 depicts relatively diverse educational scores throughout the County, with all regions of unincorporated San Bernardino County showing areas of high educational score and lower educational score, without a particular spatial concentration. As discussed via the California school rankings, many of these school may fall below the 50th percentile when compared to other schools in the state. So, while unincorporated San Bernardino County does not show concentrations of limited access to schools, many of the schools in unincorporated areas perform more poorly than other schools in the state. Though San Bernardino County differs from the rest of the SCAG region in many ways, lack of access to high performing schools in rural and unincorporated communities reflects the trends seen in Imperial and Riverside Counties.

Areas across the SCAG region with low median incomes tend to correlate with low expected educational outcomes and low TCAC educational performance scores, as compared to areas with higher median incomes. Communities like Mentone, Oak Glen, and San Antonio Heights have higher median incomes than other communities in unincorporated San Bernardino County, and also see higher TCAC Educational performance scores. Throughout the SCAG region, higher educational outcomes are often, though not exclusively expected in areas with higher median incomes.

Table 2-32 California School Ratings Rank, 2016

District	School Name	CA School Ratings Rank
Adelanto Elementary	Donald F. Bradach Elementary	1
	El Mirage Elementary	1
Apple Valley Unified	Sycamore Rocks Elementary	5
Barstow Unified	Skyline North Elementary	7
Bear Valley Unified	Baldwin Lane Elementary	4
	Big Bear High	5
	Continuation Chautauqua High	3
	North Shore Elementary	4
Colton Joint Unified	Bloomington High	4
	Crestmore Elementary	6
	Gerald A. Smith Elementary	4
	Mary B. Lewis Elementary	2
	Ruth O. Harris Middle	3
	Walter Zimmerman Elementary	4

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Table 2-32 California School Ratings Rank, 2016

District	School Name	CA School Ratings Rank
Fontana Unified	Almond Elementary	2
	Beech Avenue Elementary	5
	Live Oak Elementary	3
	Redwood Elementary	4
	Sequoia Middle	3
	West Randall Elementary	2
Helendale Elementary	Helendale Elementary	5
	Riverview Middle	5
Hesperia Unified	Oak Hills High	6
Lucerne Valley Unified	Lucerne Valley Elementary	2
	Lucerne Valley High	5
	Lucerne Valley Middle	2
Morongo Unified	Friendly Hills Elementary	6
	Joshua Tree Elementary	3
	Landers Elementary	6
	Morongo Valley Elementary	6
	Yucca Mesa Elementary	7
Oro Grande Elementary	Oro Grande Elementary	1
Redlands Unified	Mentone Elementary	6
	Redlands East Valley High	9
Rim of the World Unified	Lake Arrowhead Elementary	6
	Mary P. Henck Intermediate	2
	Mountain High	4
	Rim of the World Senior High	6
	Valley of Enchantment Elementary	3
San Bernardino City Unified	Kimbark Elementary	7
	Paakuma K-8	3
	Monterey Elementary	1
	Muscoy Elementary	3
	Newmark Elementary	4
	Vermont Elementary	5
Silver Valley Unified	Chaparral High	3
	Newberry Springs Elementary	6
	Silver Valley Academy	8
	Silver Valley High	8
	Yermo Elementary	6
Snowline Joint Unified	Baldy Mesa Elementary	4
	Heritage	9
	Phelan Elementary	2
	Pinon Hills Elementary	7
	Pinon Mesa Middle	5
	Quail Valley Middle	6

Table 2-32 California School Ratings Rank, 2016

District	School Name	CA School Ratings Rank
	Serrano High	8

Note: The California School Ratings Rank is determined by a school's percentile in comparison to other schools of the same type in California. Percentiles are calculated by California School Ratings, based on the 2016 CAASPP test scores. For example, schools in the 90th percentile and above have rank 10, 80%-89.99% rank 9 and so on. A score of 1 is the lowest score, and a score of 10 is the best score.

Mobility

Local and regional bus service is provided through five operators: Omnitrans, Morongo Basin Transit Authority, Mountain Transit, Victor Valley Transit Authority, and Needles Area Transit. Rail service is currently provided by Amtrak and Metrolink, with future rail or other transit service planned in Redlands and Ontario/Rancho Cucamonga (Redlands Passenger Rail and Ontario Loop projects). In addition to bus and rail, alternative multimodal transportation programs include the Inland Empire Commuter rideshare program, Ontario Airport-Lyft ride-hailing program, and San Bernardino Loop vanpool subsidy program. Between these services, much of unincorporated county is serviced with some access to public transit. Metrolink does not provide any direct stops in unincorporated areas of the county, however there are eight Metrolink stops in jurisdictions throughout the Valley region of San Bernardino County.

All Transit is a data tool that measures access to transit, connectivity, and service availability. According to All Transit, San Bernardino County has a transit performance score of 4.4 compared to 5.5 for the SCAG region as a whole (scores on a scale of 1 to 10, with 10 being the best). All Transit cites a "low combination of trips per week and number of jobs accessible enabling few people to take transit to work" as the reasoning behind the assigned score. This score aligns with the low rate of transit usage, with just over one percent of residents throughout the county rely on public transportation to travel to and from work according to the 2019 and 2020 San Bernardino County community indicators report on transportation.

Public transit is more readily available in the urban centers of the SCAG region with several transit providers including Riverside Transit Agency, Los Angeles Metro, Orange County Transportation Authority, among others. Similar to San Bernardino County, eastern Riverside County and Imperial County have lower transit scores than the SCAG region at large due to limited transit routes and frequency. However, San Bernardino largely outperforms Riverside County (score of 3.3) and Imperial County (score of 0.1).

To meet the needs of residents with disabilities, Omnitrans provides special transportation services. The Omnitrans Travel Training program provides one-on-one or group assistance to seniors (age 62+) and individuals with disabilities and helps them ride the Omnitrans bus system for the first time. The program is free to participate in and is available to qualifying individuals who reside in the Omnitrans service area.

Environmental Health

In October 2021, the California Office for Environmental Health Hazard Assessment finalized the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map

and compare community's environmental scores. A community with a high score is one with higher risks of exposure to pollution and other negative environmental indicators as well as more vulnerable population characteristics. As shown in Figure 2-13, San Bernardino County has higher levels of pollution and other negative factors throughout much of the Valley, with scores steadily decreasing into the Mountain and Desert Regions. The areas with the poorest environmental health are those surrounding urban centers, such as the communities of Muscoy and Bloomington, due in part to increased traffic emissions and industrial uses generated and located throughout the Valley region. Environmental conditions in San Bernardino County are similar to dense, urban cores in the SCAG region (e.g., cities of Riverside, Los Angeles, Pomona, etc.), where traffic and other factors decrease the level of environmental health. The SCAG region is unique in that it has dense urban areas and expanses of desert and agricultural lands. In each type of geography, there are different causes of poor environmental conditions ranging from vehicular congestion to heavy equipment. Much of coastal Southern California has positive environmental conditions. The Hazards Element of the County Policy Plan identifies the unique characteristics associated with each area that is considered an environmental justice focus area (a populated census tract with a CES 4.0 composite score of 75 or higher). Countywide plan policies HZ-3.1 through HZ-3.21 specifically address development and regulation in Environmental Justice communities. Actions specific to Environmental Justice communities are also included in the County Implementation Plan, including actions IMP-2021-HZ-24, 25, and 27. These actions aim to increase food access, provide technical assistance, and address notification standards for environmental justice communities.

Disproportionate Need and Displacement Risk

Related Outreach

The County received public input related to disproportionate need and displacement related to overpayment, homelessness, and displacement. Input on overpayment and displacement were most commonly cited together in connection with the surging popularity of short-term rentals, with members of the public expressing strong concern in the Mountain and Desert regions that property owners have been converting a sizable portion of the long-term rental housing stock to short-term rentals, which is cited as a problem for some long-time residents, lower wage workers, and businesses that employ lower wage workers. Public input on homelessness highlighted the need to address the root causes of homelessness and expand homelessness prevention and housing programs, both related and unrelated to COVID.

Overcrowding and Overpayment

Overcrowding is a more significant problem among renters in San Bernardino County than owners. While an average of 8% of all households in the county are overcrowded, 12% of renters and 6% percent of owners are living in overcrowded situations. The highest rate of overcrowding among renters is present in the communities of Bloomington (35%) and Muscoy (40%), and the highest rate of overcrowding among owners is also in Muscoy CPA (24%). Overcrowding is also present among all households, at a lesser rate, in Lytle Creek, Mentone, and Lenwood. The trends of overcrowding in San Bernardino County reflect the region, with higher concentrations of overcrowding in areas with higher poverty. Overcrowding is more prevalent in most urban and suburban centers in SCAG than in rural areas, with

most of these in the western part of the SCAG region. This includes cities of Los Angeles, Santa Ana, Anaheim, Ontario, Riverside, Perris, San Bernardino, Oxnard, and more. In these areas, more than 20% of residents in much of these cities are living in overcrowded situations. The higher rate of overcrowding is often associated with a lack of affordable and/or appropriately-sized housing.

Overpayment is a more significant issue in San Bernardino County. As shown in Figure 2-14, renter households overpaying for housing is a chronic issue across San Bernardino County and the region, with rates of overpayment by renters generally increasing across the county since 2014. Approximately 36% of all renter households in unincorporated San Bernardino County are spending over 30% of their income to pay for housing, with 28% of those spending over 50% of income (severely overpaying). Additionally, approximately 26% of owners are overpaying for housing. Areas with the greatest rate of overpayment have shifted in similar patterns with the increase in poverty. Overpayment by renters has by and large increased since 2014 across all communities in unincorporated San Bernardino County, while rates of overpayment by homeowners has decreased since that time countywide. Overpayment among owners has decreased slightly throughout the SCAG region, similar to San Bernardino County. While overpayment is pervasive throughout the region, the highest rates of overcrowding occur in the City of Los Angeles and surrounding areas. In other areas of SCAG, overpayment among renters is similarly high and presents a barrier to stable housing for all households.

The shortage of housing in San Bernardino County may exacerbate both overcrowding and overpayment as residents may have to "double up" due to lack of housing options or to be able to afford the housing that is available. In 2019, the vacancy rate for rental units was 3.7 percent, below the national average of 5.97 percent. These vacancy rates are typically considered low as they do not provide enough availability for residents to easily relocate due to any circumstances that may arise, such as a change in job, income, or growing family.

Substandard Housing

Housing condition does not necessarily present an immediate fair housing concern in unincorporated San Bernardino County, as over 70% of all units were built after 1970 and one-third of all units built after 1990. Generally, houses built 30 or more years ago are considered in need of rehabilitation and likely to require major repairs. Houses 50 years or older are more likely to need substantial and costly renovations, including upgrades to comply with current standards for fire and earthquake safety. Unincorporated San Bernardino County has a healthy portion of newer housing stock (see "Housing Age and Condition" of the Community Profile). Due to limited staff capacity and the geographic size of San Bernardino County, a housing condition survey has not been conducted recently. However, other indicators of substandard housing, like lack of a complete kitchen or plumbing, are not a significant factor in San Bernardino County, as less than 4% of all households report these conditions.

Compared to other counties in the SCAG region, the unincorporated areas of San Bernardino County have newer housing stock, which would typically indicate better housing stock. For example, 77% of the housing stock is older than 30 years in Ventura County and 75% of the housing stock is older than 30 years in Orange County. Additionally, the median income is significantly higher in other jurisdictions of the region when compared to San Bernardino County. Therefore, it is likely that residents in other areas

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of the SCAG region have a greater ability to afford regular maintenance on their homes and may maintain their condition overtime. Given the composition and age of the housing stock in San Bernardino County (despite households earning less comparable to those in other counties), it may be that housing conditions are less deteriorated in other areas of the SCAG region.

Homelessness

~~The latest countywide point-in-time survey of those experiencing homelessness took place in April 2020 (just one month after the stay-at-home order was given), and the 2021 survey was cancelled due to the ongoing pandemic. Accurate estimates of homeless rates are unavailable for 2021.~~ According to the latest countywide point-in-time survey of those experiencing homelessness ~~available~~ (counts taken in ~~from January~~ February ~~of~~ 2022~~0~~), there were approximately ~~159~~ 97 adults and children experiencing homelessness on any one day in unincorporated San Bernardino County, ~~with 147 of these~~all of which were unsheltered. The breakdown of where (and how many) people experiencing homelessness were found is as follows: Mountain region: Big Bear City/Sugarloaf/Running Springs (~~13~~8), Crestline (~~22~~13); Valley region: Bloomington (~~19~~11), Muscoy (~~24~~13); East Desert region: Joshua Tree (~~59~~ 28~~(5 sheltered)~~), Landers (~~2~~4), Morongo Valley (~~5 all sheltered~~0); North Desert region: Phelan/Pinon Hills (~~2~~1); and countywide or unknown (18). The actual number of people experiencing homelessness in the unincorporated and incorporated parts of San Bernardino County is likely greater, and the point-in-time survey is simply the most complete dataset that can be feasibly compiled on an annual basis. There are a number of reasons why point-in-time surveys may not county every single person who is experiencing homelessness on the day of the county, such as those who do not want to be found by anyone associated with the government or related activities. Additionally, some may temporarily reside in a friend's house on the day of the count, but be unsheltered the very next day. According to the 2022 point-in-time survey, ~~Countywide,~~ there were approximately 3,125 adults and children experiencing homelessness on any one day throughout the entire county, with 2,389~~0~~ of these unsheltered. Persons experiencing homelessness, or at risk of becoming homeless, are typically extremely low-income and are displaced from housing due to inability to pay or other issues. In San Bernardino County, factors that were decided to have contributed to the homelessness include difficulties with mental and physical illness, substance abuse, and economic hardship. While there are several shelters and homeless resources in San Bernardino County available to those homeless residents in need (Table 2-28), there are limited services available outside of incorporated jurisdictions.

Displacement Risk

Displacement risk increases when a household is paying more for housing than their income can support, their housing condition is unstable or unsafe, and when the household is overcrowded. Each of these present's barriers to stable housing for the occupants. In San Bernardino County, renters make up only 40% of households countywide. Particularly in unincorporated San Bernardino, rates of rental housing are low, with the largest concentration of rentals seen in the Valley region near highly populated incorporated cities like the City of San Bernardino and the City of Redlands. Rates of overpayment by renters in unincorporated areas of the county are significant, with rates of over 40% or more of the population seen across much of the unincorporated county area. Areas with higher rates of overpayment by renters tend to coincide with areas that have lower median incomes. So, while there is a low percentage

of population renting in unincorporated San Bernardino County, those residents who are renting may face significant rates of overpayment.

This trend may indicate a lack of diversity in types of available housing in unincorporated San Bernardino County. In total, 83% of housing units in unincorporated San Bernardino County are single-family homes, leaving more limited options for renters in terms of housing types and housing cost. While housing production slowed between 2010 and 2020 throughout southern California, growth rates in the incorporated San Bernardino County communities continued to outpace the unincorporated communities and kept pace with the overall SCAG region. Fewer than 3,000 new units were built in the unincorporated communities between 2010 and 2020, reflecting the desires of housing developers, home buyers, and renters to be closer to services and amenities associated with living in a city or incorporated town. New housing units in unincorporated areas tends to be homes built by individuals or small batches of rural estates (half-acre lots or larger), with most of the units relying on onsite water wells and septic systems.

Figure 2-15 illustrates communities vulnerable to displacement based on the presence of lower income residents (above 20% very low income) and some other factor such as a high rate of renters or high rates of people of color. Displacement pressures often result from the construction of new, higher-priced housing, enabling or encouraging the property owners of existing rental housing to increase monthly rent based on comparable market rents. Rents on new multifamily housing in unincorporated areas is lower compared to incorporated areas, and a review of housing rents around new rental housing in unincorporated areas does not indicate an increase in the rents of existing housing. As stated above, the rate of new housing construction is low in the unincorporated areas, with the majority of new housing built as ownership units. The majority of land shown on Figure 2-15 is unpopulated or underpopulated to a degree that no market pressures would exist that would create a risk of displacement. Community areas like Joshua Tree and Muscoy experience very little development pressure and are not designated (and do not contain sewer infrastructure) to support new rental housing that would put pricing pressures on existing housing stock. The unincorporated SOIs for the cities of Fontana and San Bernardino, the share of renters is above 40% and there is a high percentage of people of color. The City of San Bernardino has an extremely high number of vacant units (generally 50% higher than other Valley region cities), and so is unlikely to experience market pressures to increase housing costs and create displacement risks. The unincorporated portion of Fontana is potentially susceptible to higher risks of displacement based on the amount of existing rental stock and ability (infrastructure and market demand) to accommodate new rental housing.

Some public input stated that the tremendous popularity of short-term rentals (particularly in the East Desert region), is pushing out residents that previously occupied homes as long-term renters. As part of the County's short-term rental survey (2021-2022), roughly 650 residents from the Mountain and Desert regions expressed concern about the potential reduction in long-term rental housing due to the increase in short-term rentals. Additional anecdotal evidence was offered regarding a reduction in the number of monthly rentals being advertised and residents' statements that they know others who have had to find new housing. Through additional analysis as part of Program 4 of the Housing Strategy, the County will

evaluate the prior tenancy history of homes that obtained short-term rental permits to better understand whether a substantial number of property owners are terminating or deciding against renewing leases with long-term tenants in order to convert the property to a short-term rental. The County will also evaluate the supply of rental properties (and at what rate) in locations where short-term rentals are popular.

Aside from a potential subarea of Fontana, however, the combination of few existing rental households and little new rental housing under construction, the risk of displacement to renters in San Bernardino County generally does not pose a major fair housing concern. The County considers short-term rental housing to be a potential contributor to increasing displacement risks in the Mountain and Desert regions, although the County must complete further study to confirm where and how many property owners are changing from long- to short-term rental patterns, as well as where and how many property owners are developing new housing units explicitly for use as a seasonal home (by the property owner) and that is being made available to others as a short-term rental.

Enforcement and Outreach Capacity

The County of San Bernardino is subject to state and federal laws related to fair housing. Federal fair housing laws, including the Federal Fair Housing Act of 1968 (FHA) and the Fair Housing Amendments Act of 1988 (FHAA), protect residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, and familial status. The County complies with the California Fair Employment and Housing Act (FEHA), prohibiting discrimination based on marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination in addition to the groups protected under federal fair housing legislation.

In their 2019 Annual Report, the California Department of Fair Employment and Housing (DFEH) reported that they received 21 housing complaints for residents of San Bernardino County, not just unincorporated areas. This was just 2% of the total number of cases in the state that year (934). As part of the Fair Housing Assistance Program (FHAP), DFEH dual-files fair housing cases with the U.S. Department of Housing and Urban Development's Region IX Office of Fair Housing and Equal Opportunity (FHEO). According to HUD's Office of FHEO, 12 fair housing discrimination cases were filed with and accepted by HUD from San Bernardino County from January 1, 2006, through June 30, 2020. This number represents inquiries that were converted to accepted discrimination cases by HUD. The number of fair housing inquiries submitted (but not converted to cases) was higher for that time frame. The most common alleged basis was discrimination based on a disability (8 out of 12). In addition to these cases, 376 inquiries with unknown or undefined bases were sent to HUD between 2013 and 2021 (71% of all inquiries submitted)

Compared to other jurisdictions, San Bernardino County had fewer fair housing cases during the reported time frame than other counties such as San Diego County and Los Angeles County (see Figure 2-16). This may in part be due to the concentrations of population in these counties. San Bernardino showed comparable rates of Fair Housing cases to Riverside County and Orange, and more cases than Imperial County. FHCRC, CRLA, and DFEH were unable to provide specific location information for cases either because they do not track the geographic origin of complaints or due to confidentiality concerns.

Therefore, the County was unable to conduct a complete spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the County.

2.6.3 SITES INVENTORY

Prior to the passage of AB 686, state law required jurisdictions to identify adequate sites, appropriately zoned and available to accommodate its Regional Housing Need Assessment (RHNA) allocation. State law now requires that a jurisdiction identify sites throughout the community, in a manner that is consistent with its duty to affirmatively further fair housing (AFFH) and the findings of the above assessment of fair housing. In the context of AFFH, the site identification requirement involves not only an analysis of site capacity to accommodate the remaining RHNA allocation, but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. At the most basic level, this requirement suggests two courses of action relating to the identification of sites:

- Ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity.
- Where sites zoned to accommodate housing for lower-income households are located in lower resource areas and segregated concentrated areas of poverty, incorporating policies and programs in the housing element that are designed to remediate those conditions, including place-based strategies that create opportunity in areas of disinvestment (such as investments in enhanced infrastructure, services, schools, jobs, and other community needs).

The County evaluated its sites inventory using two somewhat overlapping but distinct methodologies. The first methodology leverages the State's TCAC Opportunity Areas data while the second methodology uses the State's AFFH data, to ensure spatial patterns were adequately analyzed and appropriate place-based strategies and metrics were established. It should be noted that all of the County's remaining RHNA allocation is for lower income households, with the RHNA allocation for moderate and above moderate income housing accommodated through pipeline projects; projected trends for ADUs and manufactured homes; and projected trends and vacant capacity (that is not required to be mapped) for rural single family homes (that do not require piped water or sewer).

Sites Inventory and TCAC Opportunity Areas

Figures 2-17 and 2-18 depict the vacant sites deemed suitable by the County to accommodate the remaining RHNA allocation overlayed on top of the TCAC opportunity areas. ~~As shown throughout the unincorporated county on~~As also shown on Figure 2-2, the unincorporated areas are largely considered low resource areas by the TCAC opportunity areas mapping and analysis. This is not unexpected as unincorporated areas are the areas in the county that are the farthest from urban and job centers, extremely low density, restricted to well or septic systems, and/or occupied by residents who do not wish to pay higher property taxes, development fees, and/or be subject to more intense development standards

and code enforcement. For the majority of the unincorporated areas, the combination of two or more such factors means that unincorporated residents will be less likely to be near opportunities evaluated by the state TCAC such as high-paying job opportunities, proficient schools, and other healthy economic, social, and environmental indicators. Moreover, many of the areas designated as high or highest resource are actually undevelopable lands (steep slope, in a National Forest, and/or reserved exclusively for open space/habitat preservation) and are outside of or far from the spheres of influence (SOIs) of the incorporated cities and towns.

Given the above, it can be difficult to simultaneously identify housing sites that are suitable for future housing (particularly lower income housing) while avoiding low resource areas. Also, unincorporated areas in the Valley region have the best access to critical resources such as high-paying jobs, transit services, and nearby urban and suburban amenities such as local and regional parks, sidewalks and streetlights, and piped sewer and water systems. Master planned areas in the Desert regions also enjoy many of these assets. Accordingly, the County focused on higher density vacant sites in Bloomington (Rialto SOI), unincorporated Fontana (Fontana SOI), Helendale (north of Victorville), and Spring Valley Lake (Victorville SOI).

In the Valley region, many housing sites are in low resource areas. As part of the County's Business Plan, Implementation Action IMP-2021-HW-2, the County will convene or augment existing annual meeting(s) of County department heads and other agencies/entities to identify strategies and opportunities to build the capacity of service providers/organizations and arrive at mutually beneficial outcomes given County goals and state/federal mandates. As described in the Contributing Factors section below and Program ~~19~~ 21 in the Housing Strategy, the County will further refine this implementation action to prioritize such activities to improve capacity in low resource areas containing lower income housing sites. In particular, the County will focus on unincorporated Fontana, San Bernardino, and Bloomington to improve educational, health, and wellness outcomes.

Additionally, as described in the Contributing Factors section below and Program 2 in the Housing Strategy, the County is currently conducting an assessment to expand sewer access in the area to increase housing capacity, which will lead to additional infrastructure like sidewalks and streetlights. The County continues to promote the Valley Corridor Specific Plan, which contains not only recently constructed affordable housing and a new County library, but also a redesigned community park. Ayala Park is currently located adjacent to Interstate 10 situated on a long, skinny parcel that is difficult to police. As a result, the park is not highly utilized by the community due to concerns about health and safety. The County is implementing specific strategies in the Valley Corridor Specific Plan to relocate and redesign Ayala Park to a location adjacent to the new library and affordable housing developments. The County has so far used its resources and state and federal resources to accumulate and invest $10 million into the effort and is currently seeking an additional $1.5 million from the state budget. In 2014, the County rehabilitated the baseball fields and relocated/improved the equestrian arena in Kessler Park, which is other community park in Bloomington.

Finally, as described in the Contributing Factors section below and Program 3 in the Housing Strategy, the County will also consider reducing or waiving fees for accessory dwelling units (ADUs) proposed in

high/highest resource areas (per TCAC mapping) when the ADUs are reserved for lower income households. The intent is to bolster the production of housing accessible to lower income households on land that is already developed with single family homes. Unincorporated parcels that contain single family homes tend to be larger compared to those in incorporated areas, which enables unincorporated parcels to accommodate an ADU more easily while maintaining a sense of separation and privacy sought by those choosing to reside in unincorporated areas.

Outside of the Valley region, the County limited its lower income land inventory to those areas that were at least moderate resource areas and were close to high-paying job opportunities and other amenities such as parks. Both Helendale and Spring Valley Lake contain the infrastructure to support high density and lower income housing while being immediately adjacent to or very nearby local parks, a regional park, and an abundance of high-paying job opportunities.

Sites Inventory and County Analysis of Individual and Aggregated Fair Housing Data

In order to assess spatial patterns and identify potentially significant concentrations of fair housing issues specific to the housing opportunity sites within each region (Valley, Mountain, East Desert, and North Desert) and each community planning area (CPA), an analysis of fair housing factors was conducted by census tract (for detailed results, see Appendix B).

AFFH Factors and Analysis Methodology

The County analyzed 12 of the State's AFFH factors for each census tract that falls within the unincorporated county (the areas within spheres of influence or community planning areas). The diversity index score was selected to represent the individual racial scores that are part of HCD's AFFH data sets to avoid overrepresentation of racial factors.

- CES 4.0 composite percentile score
- CES 4.0 population characteristics percentile score
- CES 4.0 pollution percentile score
- CES 4.0 linguistic isolation percentile score
- Percent of population with a disability
- Overpayment by renters
- Percent of population below poverty level
- Diversity index score
- Median income
- Jobs proximity index score
- TCAC education score
- Percentage of children living in married family households

Using data from each census tract for individual fair housing factors allowed the County to produce an in-depth analysis at census tract, regional, and countywide levels. The census tract data for each factor

was aggregated to create average scores for each CPA, with the CPA averages aggregated to determine regional averages. Individual census tract data was also aggregated to calculate an unincorporated county wide average for each fair housing factor analyzed. This analysis allows the County to analyze spatial trends from the census tract level to a county-wide level and identify any patterns that may exist by CPA and by region.

Census tracts were assigned a positive or negative score of 1 through 3, with scores that reflect less favorable performance compared to the unincorporated countywide average assigned positive points and scores that reflect more favorable performance assigned negative points, with all points reflective of the standard deviation of an individual factor score relative to the unincorporated countywide average. When the scores for all 12 factors are aggregated into a total score for each census tract, the best possible score for a single census tract is negative 36 and the worst possible score is positive 36 (all factors 3 standard deviations better or worse compared to the unincorporated countywide average, respectively).

Across the unincorporated county areas within CPAs or SOIs, the total scores for individual census tracts range from -13 to 11, a spread of 24 points out of a possible 72-point range, with 114 (79%) of the 145 unique census tracts returning a total score between 3 and -3. Eight census tracts (5%) scored below -3 (which are the most favorable census tracts) and 23 census tracts (16%) scored above 3.

Results by Region, CPA, and Census Tract

The Mountain region CPAs exhibit the most consistent conditions, with all but two census tracts within one standard deviation from the unincorporated county average for every AFFH factor. One Lake Arrowhead census tract, overpayment by renters is higher by more than two standard deviations. One Oak Glen census tract has an average median income that his higher by more than two standard deviations.

Neither the East nor the North Desert regions contain a CPA that, as a whole, deviates significantly (more than one deviation) from the unincorporated county average. In the East Desert, the census tract within the Pioneertown CPA boundary that deviates substantially in the unfavorable direction reflects the population of Yucca Valley as that portion of Pioneertown is unpopulated (the CPA's population resides within the census tract to the west). In a census tract in both the Joshua Tree and Homestead Valley communities, the average percent of the population with a disability is higher by more than two standard deviations, though that is somewhat expected with the large number of older and retired individuals that reside in these communities.

In the North Desert, the census tracts that overlap with the Needles SOI do not actually contain any permanent population in the unincorporated areas where the County has land use authority. The two census tracts within the Barstow SOI contain no or few residents and the scores reflect the conditions of residents within the City of Barstow. The community of El Mirage and the northern extent of the Phelan/Pinon Hills CPA primarily reflect conditions of the census tract that overlaps with a substantial part of the City of Adelanto. In one Lucerne Valley census tract, the percentage of residents with income in the past 12 months below the poverty level is higher by more than two standard deviations. Another census tract in Lucerne Valley has a lower rate of children present in married couple families by more

than two standard deviations, though that is likely due to the higher rate of retired couples and relatively small population of people that live in the community.

The Valley region sees the most variation throughout the County, with notable patterns. While several census tracts in the Valley region see fair housing factor scores that are more than two or three standard deviations from the mean, these deviations tend to follow region specific patterns. Unfavorable standard deviations in the Valley are usually seen in the environmental factor scores (CES 4.0 factors) and favorable standard deviations are usually seen in the diversity scores, median incomes, and job proximity factors. While some census tract specific outliers are notable, the overall Valley region follows a data pattern that indicates a larger population that is potentially exposed to more negative environmental factors, while simultaneously contributing to overall positive factors like more access to jobs, higher median incomes, and higher diversity.

There is one census tract that exhibits very high rates of residents with income below the poverty level in the past 12 months. This census tract overlaps with the SOIs for the cities of Highland and San Bernardino and the results are heavily influenced by the larger percentage of incorporated residents, though patterns for unincorporated residents are not thought to differ substantially. There are multiple census tracts in the communities of Bloomington (three tracts) and Muscoy (one tract) and the SOIs of Fontana (two tracts) and Montclair (two tracts) that exhibit higher rates of linguistic isolation by more than two standard deviations. There are also multiple census tracts in the communities of Bloomington (two tracts) and Colton (one tract) and the Fontana SOI (two tracts) that exhibit higher CES 4.0 pollution percentiles by more than two standard deviations.

Analysis of CPAs with Housing Opportunity Sites

These total scores were then analyzed across the county by groupings of deciles (10 percentile points) to identify those census tracts that could be considered to have the greatest and least confluence of AFFH factors. The County considered those census tracts with total scores in the lower 50th percentiles (0 to 50th percentile) to be areas where identifying sites for lower income housing would be desirable. Census tracts with total scores between the 50th and 70th percentiles are considered acceptable, though programs, strategies, and metrics should be considered to address the individual AFFH factors. Those census tracts in the upper 30th percentiles (70th to 100th percentile) are areas where the identification of sites for lower income housing must be accompanied by programs, strategies, and metrics that seek to improve conditions in the census tract. Figures 2-19 and 2-20 depict the vacant sites deemed suitable by the County to accommodate the remaining RHNA allocation overlayed on top of the County's analysis of aggregated AFFH factors. Figure 2-21 depicts the percentile distribution of the aggregated AFFH factors for the entire unincorporated county (the areas within spheres of influence or community planning areas) by census tract.

The census tracts in communities that contain housing opportunity sites with total scores below the 50th percentiles represent roughly half (46%) of the County's capacity to accommodate their lower income RHNA allocation. A little over one-quarter (28%) of the County's capacity is provided in census tracts with total scores between the 50th and 70th percentiles. The balance (26%) of the County's capacity is

provided in census tracts with total scores between the 70th and 80th percentiles. No housing opportunity sites are proposed in census tracts that exhibit a total score higher than the 80th percentile.

Individual factors related to patterns of segregation and integration within this analysis include linguistic isolation, disability status, poverty status, diversity index scores, median income, and percentage of children in married family households. Housing opportunity sites in the communities of Mentone and Helendale and the Victorville SOI fare well in these categories, with housing sites in Mentone and the Victorville sphere having scores more than one standard deviation in a favorable direction for poverty level and median income factors.

Housing opportunity sites in community of Bloomington and the SOIs of Chino, Fontana, Montclair, and San Bernardino take place in census tracts with scores that are more than one standard deviation away from the unincorporated county average in an unfavorable direction for CES 4.0 composite scores, pollution scores, and linguistic isolation scores. Environmental health concerns are a widespread issue in the Valley region, particularly in the western half that is more heavily urbanized and contains more freeways and industrial uses.

Individual fair housing factors related to access to opportunities in this analysis include CES 4.0 population characteristic percentile scores, jobs proximity index scores, and TCAC education domain scores. Housing sites in the community of Helendale and the SOIs of Chino, Victorville, and Montclair score within one standard deviation of the unincorporated county average in all of these fair housing factors, indicating there is no concentration of such fair housing concerns. Sites in Mentone and Fontana see TCAC education scores that are higher than the unincorporated county average, while certain census tracts with housing sites in Bloomington and all census tracts with housing sites in Fontana exhibit jobs proximity index scores that are better than the unincorporated county average by at more than one standard deviation. Sites in census tract 6071004001 in Bloomington has a CES 4.0 population score that is unfavorable compared to the unincorporated county average by more than one standard deviation, due largely to the influence of higher rates of linguistic isolation and somewhat higher rates of asthma and cardiovascular disease.

Disproportionate housing needs are represented by analyzing overpayment by renters. Sites located in census tract 6071006302 in San Bernardino's sphere experience rates of overpayment by renters that are higher than unincorporated county average by more than one standard deviation. All other housing opportunity sites fall within census tracts that experience average or better than average rates of payment for housing occupied by renters.

2.6.4 CONTRIBUTING FACTORS

Based on public outreach and the technical assessment of fair housing in San Bernardino County, Table 2-34 identifies the factors that contribute or are the most likely to contribute to fair housing issues. Aside from the issues identified in the technical analysis, potential contributing factors include community opposition to affordable housing, lack of regional cooperation, and lack of public or private investment in affordable housing options.

TABLE 2-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

Insufficient Housing Supply
Contributing Factors (High Priority)
Lack of Variety of Housing types: Housing is more affordable in remote areas, but these areas lack access to opportunity. New housing with good access to opportunities is generally limited to single family ownership. Additionally, there is some displacement risk in parts of the Valley region. These can create issues where lower income households do not have access to housing in areas with good access to opportunities.
Meaningful Actions, Metrics, and Milestones
Continue to fund public services that increase access to healthcare and supportive services in areas with low access to opportunity. Expand infrastructure capacity in Bloomington to increase opportunity for new rental housing with good access to opportunity. Expand the use of housing vouchers, particularly in the Valley region. **Timeline:** 2022: Convene or augment existing annual meeting(s) of County department heads and other agencies/entities to identify strategies and opportunities to build the capacity of service providers/organizations and arrive at mutually beneficial outcomes given County goals and state/federal mandates. Prioritize low resource areas containing lower income housing sites, with a focus on improving educational, health, and wellness outcomes (see also Program ~~19~~ 21 in the Housing Strategy and IMP-2021-HW-2 in County Business Plan). 2022: Coordinate with the City of Rialto (wastewater treatment provider for Bloomington) and complete sewer expansion study to recommend options and alternatives along with cost implications and funding mechanisms for near-term implementation concurrent with future housing development (see also Program 2 in the Housing Strategy and IMP-2021-IU-2 in County Business Plan). 2022: Coordinate with other jurisdictions through SBCOG on pre-approved site plans for ADUs and evaluate fiscal impact of reducing or eliminating fees for ADUs that are reserved for lower income households and located in high or highest resource areas (see also Program 3 in the Housing Strategy). 2023: Conduct a study to understand where and why voucher use rates are high with the goal of replicating success in areas deemed vulnerable to displacement 2023: Identify and offer appropriate pre-approved site plans for ADUs; implement fee reductions for lower income ADUs in high or highest resource areas 2024: Structure sewer service area agreement and funding mechanism to ensure sewer can be provided with new development in Bloomington 2024: Initiate strategies to expand voucher use in areas deemed vulnerable to displacement **Metrics:** Annual meeting(s) convened and/or augmented related to public health and social service provision for health care professional shortage areas; Sewer study completed, service area agreement drafted, and infrastructure capacity expanded; an increment of 5% increase in voucher use in the Valley region

2. Community Profile

TABLE 2-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

Contributing Factors (High Priority)

Short-term Rental Housing: The prevalence of short-term rental housing, particularly in tourism areas, may constrict the availability of rental housing and increases rental prices even after County amendments in 2019. This can create an issue where lower income residents and employees lack access to affordable housing.

Meaningful Actions, Metrics, and Milestones

Conduct a public planning process to develop policies to limit the negative impacts of short-term, whole-home rentals on the availability of affordable long term rental housing (see also Program 4 in the Housing Strategy).

Timeline:

2022: ~~Conduct~~ Initiate a study to determine the current and projected impact of short-term rentals on the housing supply throughout the unincorporated county and on the motel/hotel businesses in the Mountain and Desert regions

2023 Draft and bring forward an interim cap for consideration by the Board of Supervisors on the total number of short-term rental permits on an annual basis and/or a percentage of total housing units within each community planning area in the Mountain and Desert regions

2023: Conduct public engagement to obtain insight from property owners, employers, and employees in target areas

2023~~3~~4: Conclude study and initiate implementation of strategies based on the study's findings

Metrics: Completed study and public input; new regulations on short-term rentals and incentive program to use properties for long-term rentals for local employees and lower income residents

Community Education on Affordable and Fair Housing

Contributing Factors (High Priority)

NIMBYism: Residential opposition prevents proposed new developments. This can discourage new investments and developer interest that would otherwise lead to affordable housing units, particularly in areas considered to be high or higher resource areas.

Meaningful Actions, Metrics, and Milestones

Develop educational programming with the goal of developing an understanding of affordable and workforce housing among county residents (see also Program ~~19~~ 21 in the Housing Strategy).

Timeline:

2022: Coordinate with other jurisdictions through SBCOG and the Inland Fair Housing and Mediation Board on a context-sensitive set of talking points and educational materials regarding
- the occupants, benefits, and myths of affordable housing
- fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint

2023: Finalize materials and outreach strategies with participating jurisdictions and the Inland Fair Housing and Mediation Board

2024: Distribute materials and conduct outreach on an ongoing basis

Metrics: Establishment of a formal, countywide fair housing education program; greater support for affordable housing projects by local residents in unincorporated and incorporated areas

TABLE 2-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

Linguistic Isolation
Contributing Factors (High Priority)
High percentage of residents in Bloomington, Fontana SOI, and Montclair SOI do not speak English well: Residents in census tracts that provide a large number of housing opportunity sites exhibit a high rate of linguistic isolation that may prevent them from understanding fair housing issues, communicating violations, and commenting on proposed development projects.
Meaningful Actions, Metrics, and Milestones
Where housing opportunity sites overlap with areas exhibiting high rates of linguistic isolation, augment the County's current notification process to publish notices of accepted applications for conditional use permits, changes in zoning, and Policy Plan amendments in a language other than English based on the percentage of residents in the communities, and provide additional multi-lingual fair housing materials and staffing at the County and through the Inland Fair Housing and Mediation Board. **Timeline:** 2023: Coordinate with other jurisdictions through SBCOG and the Inland Fair Housing and Mediation Board to ensure materials are provided in multiple languages; distribute such materials through the County website and at County Government Centers 2023: Update the County's notification process to include bilingual notification when applications are accepted for conditional use permits, changes in zoning, and Policy Plan amendments; also provide a bilingual process for providing, receiving, and responding to public input. 2023: Prioritize the hiring of County Land Use Services staff with bilingual skills (English and Spanish) to bolster the ability of the department to communicate with residents on a daily basis, during community outreach, and at public hearings. 2024: Distribute materials and conduct outreach on an ongoing basis **Metrics:** Production of new bilingual outreach and education materials; hire and retain at least one additional (as compared to 2022) full-time staff member with bilingual (English and Spanish) skills

2. Community Profile

TABLE 2-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

Pollution Exposure
Contributing Factors (High Priority)
Exposure to air pollution from local and regional logistics: Residents throughout the western Valley region (incorporated and unincorporated) are exposed to higher rates of air pollution released by activities associated with local and regional logistics operations along the freeways, roads, and at warehouses and distribution facilities.
Meaningful Actions, Metrics, and Milestones
Support green goods movement, emissions rules that results in cleaner air, and ensure appropriate mitigation measures are applied and enforced, with stronger measures and actions for areas that currently exhibit high rates of pollution exposure and contain housing opportunity sites. **Timeline:** 2022: Apply new indirect source rules to warehouse, trucking, and rail activities, and coordinate with South Coast AQMD and other appropriate agencies to identify and require feasible design features, onsite facilities, technologies, and other mitigation measures that eliminate or offset emissions. Rules applied and activities conducted ongoing thereafter. 2023: Identify suitable County properties for zero emission vehicle infrastructure. Establish new partnerships with private freight movers to implement 'green goods movement' technologies, such as medium- and heavy-duty zero emission vehicle infrastructure. 2023: Identify additional housing opportunity sites in Bloomington that are in census tracts with CES composite and pollution scores (latest version, currently 4th) outside of the upper quartile (i.e., below 75th percentile). These sites should augment and, ideally, replace housing sites currently within census tracts that exhibit high CES composite and pollution scores. 2024: Partner with South Coast AQMD to establish community emissions reduction plans (CERPs) for unincorporated areas such as Bloomington. Identify and implement, as feasible, actions in CERPs that are within the jurisdiction and authority of the County. **Metrics:** Implementation of new design features, onsite facilities, technologies, and other mitigation measures on new logistics projects in communities that also contain housing opportunity sites. Identify at least 15 acres of land suitable for upzoning to Residential Multiple zoning. Support and facilitate community application for CERP in and around Bloomington.

Figure 2-1 County of San Bernardino - Areas of Study

Figure 2-2 TCAC Opportunity Areas (2021) - Tract Level

Figure 2-3 Predominant Race/Ethnicity (2019) - Block Group Level

2. Community Profile

Figure 2-4 Diversity Index (2018) - Block Group Level

Figure 2-5 Median Income (2015-2019) - Block Group Level

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Figure 2-6 Poverty Status (2015-2019) - Tract Level

Figure 2-7 Racially or Ethnically Concentrated Areas of Poverty - Tract Level

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Figure 2-8 Racially or Ethnically Concentrated Areas of Affluence - Tract Level

Figure 2-9 Percent of Children in Married-Couple Households (2013) - Tract Level

Figure 2-10 Population with a Disability (2015-2019) - Tract Level

Figure 2-11 Jobs Proximity Index (2017) - Block Group Level

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Figure 2-12 TCAC Education Scores (2021) - Tract Level

Figure 2-13 Environmental Health (2021) - Tract Level

Figure 2-14 Overpayment By Renters (2019) - Tract Level

Figure 2-15 Communities Vulnerable to Displacement (2017) - Tract Level

Figure 2-16 FHEO Cases (2006 - 2020) - County Level

Figure 2-17 Housing Opportunity Sites - Valley Region - TCAC Opp

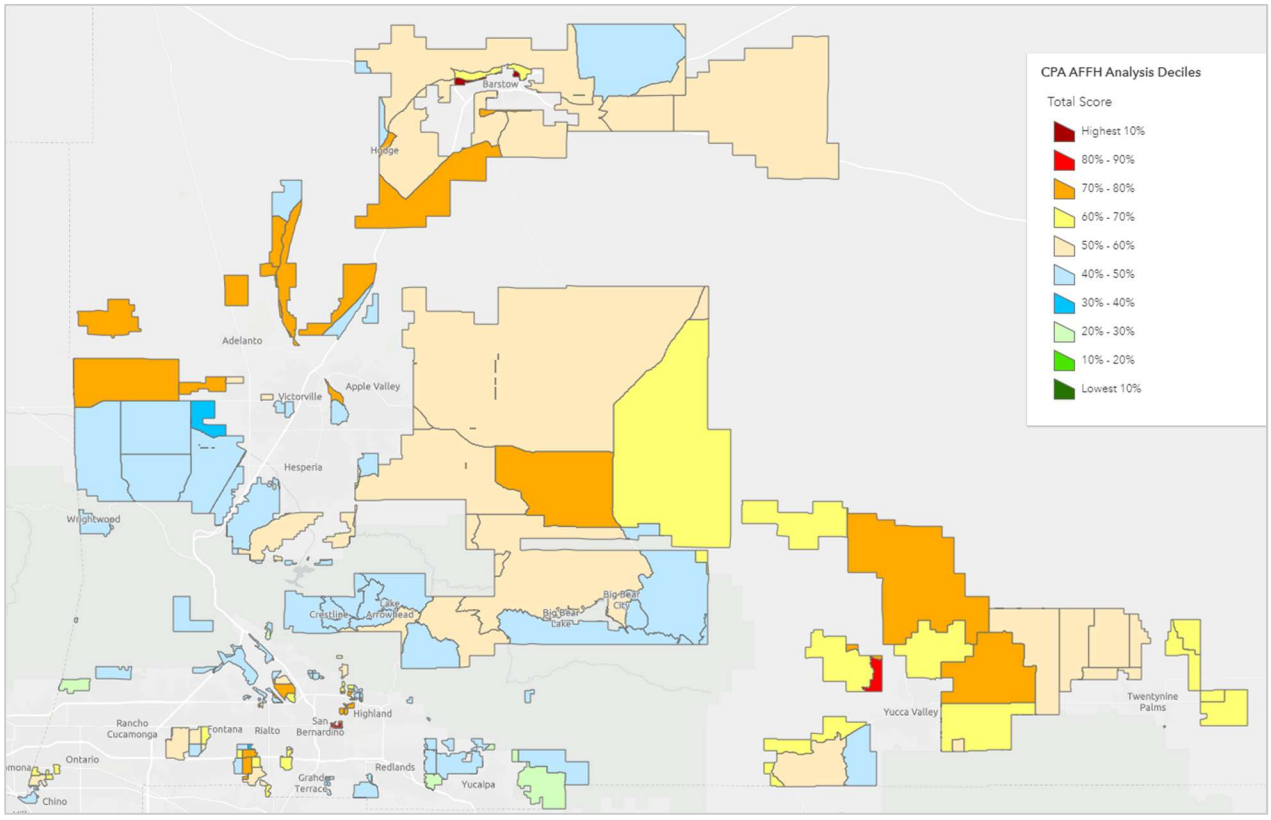
2. Community Profile

Figure 2-18 Housing Opportunity Sites - Desert Region - TCAC Opp

Figure 2-19 Housing Opportunity Sites - Valley Region - AFFH Factors

Figure 2-20 Housing Opportunity Sites - Desert Region - AFFH Factors

Figure 2-21 AFFH Factors Analysis by Unincorporated Census Tract



Created by PlaceWorks | Source: County of San Bernardino, 2019, U.S. Census
Not shown: Unincorporated community of Baker (50th percentile) and unincorporated Needles SOI (50th & 70th percentiles)

3. HOUSING CONSTRAINTS

This section discusses the potential constraints to the development, maintenance, and improvement of housing and the resources available in the unincorporated county. In addition, environmental constraints and available infrastructure is discussed. Factors constraining the development of a range of type and prices of housing may include governmental constraints, environmental constraints, availability and cost of infrastructure, and nongovernmental constraints.

3.1 LAND USE CONTROLS

3.1.1 GROWTH MANAGEMENT

Urban sprawl and "leapfrog" development contribute to traffic congestion, inadequate and/or costly infrastructure extension, water supply shortages, lack of public services, incompatible and underutilized use of land, air and water quality degradation, and jobs-housing imbalance. Urban sprawl and leapfrog growth require the premature extension of services across intervening, undeveloped land, resulting in higher costs for service extensions than would be required for concentric growth. Policies in the Land Use Element address these issues, especially those policies under goals LU-1 Fiscally Sustainable Growth and LU-3 Annexations and Sphere Development.

3.1.2 POLICY PLAN CATEGORIES AND ZONING DISTRICTS

State law requires each county and incorporated jurisdiction to have a comprehensive general plan that establishes the guidelines for all development within its jurisdictional boundaries. The County Policy Plan serves as the County's General Plan and is the foundation of all land use policies in the unincorporated portions of the county. The Land Use Element of the Policy Plan identifies the location, distribution, and density (expressed in dwelling units per acre) of development and land uses. The Housing Element plans for housing and residential uses in a manner that is consistent with the goals and policies contained in the Land Use Element and other elements of the Policy Plan.

The County Policy Plan includes five residential land use categories, four conventional categories and one that allows for greater flexibility. Prior to late 2020, the County's Land Use District (LUD) system served as its Zoning and Policy map (aka, a one-map system). In October 2020, the County transitioned to a two-map system that retains the current LUD system as Zoning Districts and introduces a second land use mapping system that groups the County's LUDs into simplified Land Use Categories (LUCs).

Table 3-1 describes the purpose and typical uses for each LUC and LUD. Two LUCs (and their corresponding zones) allow residential uses but are not listed in the table. Resource Land Management allows residential development but at extremely low densities. In addition, Commercial category allows for a mix of commercial and lower density residential uses in rural areas (when residential is permitted in the underlying zoning district).

3. Housing Constraints

Table 3-1 Residential Land Use Categories and Zoning Districts

Land Use Category	Zoning District	Description of Purpose and Typical Uses
Rural Living (R L) up to 0.4 du/ac	Rural Living (RL) up to 0.4 du/ac	To allow for rural residential development set in expansive areas of open space that reinforce rural lifestyle while preserving the county's natural areas. This would minimize development footprint and maximize underdeveloped areas with cluster-type development to provide and preserve open space.
Very Low Density Residential (VLDR) up to 2 du/ac	Single Residential (RS) up to 2 du/ac	To allow for very low density residential uses when developed as single-family neighborhoods that can share common infrastructure, public facilities, and services.
Low Density Residential (LDR) 2 to 5 du/ac	Single Residential (RS) up to 4 du/ac	To promote conventional suburban residential neighborhoods that support and are served by common infrastructure, public facilities, and services.
Medium Density Residential (MDR) 5 to 20 du/ac *(up to 25/30 du/ac for affordable housing)*	Multiple Residential (RM) 5 to 20 du/ac in Mountain/Desert *(up to 25 du/ac for affordable housing)* 11 to 20 du/ac in Valley *(up to 30 du/ac for affordable housing)*	To provide areas for a wide range of densities and housing types. The aim is to promote efficient location for higher density residential development and neighborhoods in relation to infrastructure and transit systems, as well as employment opportunities retail and service businesses, and community services and facilities.
Special Development (SD) up to 4 du/ac without a specific plan; up to 30 du/ac with a specific plan	Specific Plan (SP) up to 30 du/ac	To allow for a combination of residential, commercial, and/or manufacturing activities that maximizes the utilization of natural and human-generated resources. Specific plans intend to identify suitable areas for large-scale, master planned developments. Cluster-type development is promoted with the goal to provide and preserve open space. This district allows for mix of residential, commercial, and public/quasi-public uses in rural areas. It aims to facilitate the collaboration for joint planning efforts among adjacent landowners and jurisdictions.

3.1.3 PERMITED RESIDENTIAL USES

While the County allows for different types of residential uses in three major regions, the allowed uses are generally the same regardless of region. Table 3-2 identifies residential uses for each Land Use District and whether the use is prohibited, allowed by right, allowed per minor use permit, special use permit, or conditionally permitted. The text following this table describes particular residential uses and how the County's Code addresses the requirements of state housing law. Program 12 will amend the County's Code as necessary to ensure compliance with state housing law.

Table 3-2 Summary of Permitted Residential Uses

Land Use District			Housing Type X = Prohibited / A = Allowed Use (by right) / MUP = Minor Use Permit / CUP = Conditional Use Permit SUP = Special Use Permit / RCP = Unlicensed Residential Care Facilities Permit
RL	RS	RM	
A	A	X~~***~~(5)	Single dwelling
CUP	CUP	CUP	Mobile home park/manufactured home (land-lease community)
X	X	A	Multiple dwelling, 2 to 19 units, attached or detached
X	X	MUP	Multiple dwelling, 20 to 49 units, attached or detached
X	X	CUP	Multiple dwelling, 50+ units, attached or detached
A	A	A	Accessory structures and use
X	X	M/C	Group residential (sorority, fraternity, boarding house, etc.)
A	A	A	Guest house
Varies (~~5~~6)	Varies (~~5~~6)	Varies (~~5~~6)	Transitional Housing
Varies (~~5~~6)	Varies (~~5~~6)	A	Supportive Housing
X	X	CUP	Parolee and/or probationer home
A	A	A	Accessory dwelling unit (8)
A	A	A	Junior accessory dwelling unit
X	X	CUP	Emergency Shelter
X	X	A	Low Barrier Navigation Centers
A	A	A	Licensed Residential Care Facility (≤6 persons)
(~~6~~7)	(~~6~~7)	CUP	Licensed Residential Care Facility (7+ persons)
RCP	RCP	RCP	Unlicensed Residential Care Facility (≤6 persons)
(~~6~~7)	(~~6~~7)	CUP	Unlicensed Residential Care Facility (7+ persons)
SUP	SUP	SUP	Short-term Rentals

Source: County of San Bernardino Development Code, 2021.
1. Detached multiple dwelling units refer to two or more multiple dwelling unit buildings on one lot.
2. Not to exceed 4 spaces per acre on a minimum parcel size of 20 acres.
3. Mobile home park, minimum parcel size of 10 acres. In Phelan/Piñon Hills Community Plan, a maximum of 6 du/acre are allowed—in all other areas, a maximum density of 7 dwelling units per acre are allowed.
4. Allowed as an accessory use only, on the same site as a residential use allowed by this table and where the parcel is twice the minimum lot size required by the land use zoning district.
5. Single dwellings are allowed when sewer service is not available, or the lot is less than half an acre.
6. Permitted, conditionally permitted, or prohibited in the same manner as the other single-, two- or multi-family dwelling units, group residential, parolee-probationer home, residential care facilities, or boarding house in the corresponding zone.
~~6~~7. Permitted through a request in accordance with the reasonable accommodation ordinance.
8. Accessory dwelling units are also permitted as an Allowed Use in the Resource Conservation, Agricultural, Rural Commercial, and Special Development – Residential Zone, which are the only other zones that permit residential uses.
~~***Single dwellings are allowed when sewer service is not available, or the lot is less than half an acre.~~

3. Housing Constraints

Accessory Dwelling Units

The Development Code contains provisions for accessory dwelling units (ADUs), which are attached or detached structures that are constructed on the same lot as a single or multifamily unit and provide complete independent living facilities for one or more occupant. Junior ADUs are enclosed within the primary residence and provide partial independent living facilities for one or more occupant. The state and many jurisdictions throughout California recognize that ADUs can provide housing at below market prices (without public subsidy) and serve to meet the special needs of the elderly and low-income persons, such as students or adult children just entering the workforce. Numerous amendments to state law were made in 2017 and 2020 that require jurisdictions to approve ADUs by right, eliminates or reduces impact fees, and requires jurisdictions to apply only limited objective development standards. The County updated its Development Code, Chapter 84.01, in 2017, 2020, and 2021 to reflect changes in state law.

In the Valley region, ADUs must be rented for a term longer than 30 days. The Mountain and Desert regions allow for short-term ADU rentals, with terms less than 30 days, in accordance with Chapter 84.28 of the County Development Code.

Employee and Farmworker Housing

In addition to traditional ADUs, the County permits accessory dwellings for persons employed on the same property.

- **Caretaker Housing.** A caretaker dwelling unit is intended to accommodate owners, operators, or caretakers employed to guard or operate part or all of a site. Caretaker housing is allowed in all zones, except Floodway and Open Space, subject to the standards of traditional ADUs. Recreational vehicles are not permitted to be used for caretaker housing.

- **Seasonal Labor Quarters.** Labor quarters are allowed by right in both the Resource Conservation and Agricultural districts, provided the accessory use is on the same site as the agricultural use. Recreational vehicles are also allowed with a special use permit. In the Agricultural Preserve Overlay, farm labor camps and temporary trailer housing are allowed as labor quarters. A site plan permit is required to ensure proper services are supplied to the temporary laborers. Also, a special use permit shall be required to monitor the use to ensure that labor quarters are operated in a safe and healthful manner. While few seasonal labor quarters still exist due to the limited agricultural operations in unincorporated areas, seasonal labor quarters are still permitted in accordance with state law. Through the implementation of Program 12, the County will more explicitly ensure compliance with the Employee Housing Act.

Manufactured/Modular Housing

Manufactured homes on permanent foundations are considered and regulated as conventional single-family dwellings built onsite. Modular housing differs from manufactured housing in that manufactured homes are built to federal (HUD) codes. Modular housing is built to comply with local and state building codes, just like site-built homes, only in a timelier manner and quality-controlled environment. They are built on floor systems that can be installed on a permanent foundation. Manufactured and modular

housing can be single-family dwellings, but also include a wide range of multifamily options, like duplexes, triplexes, and townhomes.

State law requires cities and counties to permit manufactured housing on lots for single-family dwellings when the home meets the location and design criteria established for such uses in the zoning ordinance (Government Code § 65852.3). The County defines a manufactured home as a structure, transportable in one or more sections, that is built on a permanent chassis and is designed for use with or without a permanent foundation when connected to the required utilities. For floodplain management purposes, the term "manufactured home" also includes park trailers, travel trailers, and other similar vehicles placed on a site for greater than 180 consecutive days. Manufactured housing is permitted by right in all single-family zones subject to the same standards as site-built housing.

Duplex from Nogi Gardens Development
Courtesy of California Manufactured Housing Institute (CMHI)

Nogi Gardens Streetscape
Courtesy of California Manufactured Housing Institute (CMHI)

Manufactured Multifamily Home
Courtesy of CMHI

Apartments
Courtesy of CMHI

California law (Government Code § 65852.7) declares mobile home parks a permitted land use on land planned and zoned for residential land use designated by the jurisdiction's general plan. However, the jurisdiction may require a use permit and establish appropriate density and development standards for mobile homes. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development. Mobile home parks are allowed throughout the unincorporated county in residential and rural commercial districts with a conditional use permit or special use permit. They require a minimum parcel size of either 10 acres (in the RS or RM districts) or 20 acres (in the RL district), with maximum density determined by the district in which it is located.

Housing for People with Disabilities

The Lanterman-Petris Act and the Community Care Facilities Act declare that it is the policy of the state that people with a wide variety of disabilities are entitled to live in normal residential settings. The Health and Safety Code (California Residential Care Facilities for the Elderly Act) extends this protection to elderly persons. These acts cover 12 different types of facilities: residential facility, adult day program, therapeutic day services facility, small family home, social rehabilitation facility, community treatment facility, transitional shelter care facility, residential care facility for the elderly, alcoholism or drug abuse recovery or treatment facility, and congregate care facility.

3. Housing Constraints

The Health and Safety Code (§§1500 et seq.) requires that licensed community care facilities serving six or fewer persons be subject to the following regulations: (1) treated the same as a residential use, (2) allowed by right in all residential zones, and (3) treated the same with respect to regulations, fees, taxes, and permit processes as other residential uses in the same zone. The Health and Safety Code extends this protection to residential care facilities for the elderly (§§ 1569.84 et seq.), to alcoholism or drug abuse recovery or treatment facilities (§§ 11834.22 et seq.), and to congregate care facilities (§§ 1267.16. et. seq.), all of which serve no more than six clients. Residential care facilities serving seven or more clients are conditionally permitted in the RM zone.

Both licensed residential care facilities for six or fewer clients and licensed residential care facilities for seven or more clients shall conform to property development standards according to the land use zoning district it is in. California Health & Safety Code prevents overconcentration of residential care facilities to maintain an appropriate separation distance of 300 feet or less.

There are many licensed residential care facilities for seven or more clients throughout various communities in the unincorporated county. The County currently requires a conditional use permit for such a use in the RM Zone and permits such a use in the RL and RS zones with the submittal of a request for major reasonable accommodation (see next section). Below is a listing of those approved by the Zoning Administrator between 2014 and 2018 in the RL and RS zones through application of a reasonable accommodation ordinance. Given the consistent approval of facilities serving seven or more clients, the County finds that its current permit processes, requirements, and development standards are not considered a constraint to the development of these necessary social care facilities.

- Cedar House (Bloomington): increase the capacity of existing facility from 99 residents to 125 residents, RS Zone, alcohol and drug program
- Maple House (Bloomington): 11 adult women and up to 15 children ages 5 and under, RS Zone, alcohol and drug program
- Turrill Transitional Housing (Muscoy): 21 disabled veterans to live in two homes, RS Zone
- Helping Hearts California (San Bernardino): 10 disabled persons, RS Zone
- Pacific Pines (Angelus Oaks): 15 seniors, RS Zone
- Blue Skies Manor (Big Bear City): 10 disabled seniors, RS Zone
- Oasis House (Apple Valley): 42 disabled persons, RL Zone
- Chantilly Lace Manor (Oak Hills): 12 disabled seniors, RL Zone

However, to ensure that the County facilitates such housing options, the implementation of Program 12 will streamline the permitting process by subjecting residential care facilities only to objective standards. The County's current definition of family is: "A person or persons living together as a single housekeeping unit in a dwelling unit" (County Development Code Section 810.01.080(d)). This definition is consistent with what is found to be acceptable in statutory and case law.

Section 84.32.030 of the County Code establishes that no more than two unlicensed care facilities shall be on the same block, unless processed through a reasonable accommodation ordinance, though Consistent with state law, no unlicensed or licensed facilities shall be permitted to be within 300 feet of each other to avoid an overconcentration from occurring.

Parking requirements are listed in later sections in Table 3-4 and indicate that licensed care facilities serving six or fewer persons requires only two parking spaces. All other care facilities require 1 parking space per bedroom, plus one for the house manager, staff member, or employee. Such parking requirements are not considered a constraint due to the abundance of parcels that are large enough to accommodate the required number of spaces. Even assuming a large footprint of 3,000 square feet and 4,380 square feet to satisfy all setback and yard requirements, a 0.2-acre parcel will have enough remaining room to park almost nine vehicles at one time. In the unincorporated areas, there are approximately 21,803 parcels that are zoned RS or RL and at least 0.2-acre. Almost 14,000 of these parcels are at least 0.5 acre and, since building footprints do not scale proportional to parcel size, there is an abundance of residentially-zoned parcels that could accommodate dozens of parking spaces while complying with all other development standards.

Reasonable Accommodation

The County adopted Ordinance 4169 (2012) and Ordinance 4230 (2014) to provide people with disabilities with reasonable accommodation in rules, policies, practices, and procedures necessary to ensure equal access to housing. The ordinance defines two types of accommodations to deviate from the strict application of the laws, rules, policies, practices, and/or procedures of the County, including land use and zoning regulations of this code:

- **Minor:** deviation that can be removed or terminated in 90 days or less after the need for the reasonable accommodation ends
- **Major:** deviation resulting in a physical modification to the property that cannot be restored or terminated within 90 days or less after the need for reasonable accommodation ends

A request must be filed on an application form provided by the department and signed by the owner of the property, with a description of the request and reason(s) the requested accommodation is necessary. The Land Use Services Director shall have the authority to consider and act on any application for a minor reasonable accommodation and shall issue a written determination within 30 days of the date of receipt of a completed application. The Director may also refer the matter to the Zoning Administrator or the Planning Commission, if deemed appropriate. For major reasonable accommodations, the Zoning Administrator shall have the authority to consider it at the next regularly scheduled public hearing following submittal of the application. No request for reasonable accommodation may be referred to the Board of Supervisors and no variance will be required to seek an approval. The following findings must be made in order to approve a request for reasonable accommodation:

- The housing, which is the subject of the request for reasonable accommodation, will be occupied as the primary residence by an individual protected under the Fair Housing Laws

3. Housing Constraints

- The request for reasonable accommodation is necessary to make specific housing available to one or more individuals protected under the Fair Housing Laws
- The requested reasonable accommodation will not impose an undue financial or administrative burden on the County
- The requested accommodation will not require a fundamental alteration of the zoning or building laws, policies, and/or procedures of the County
- The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others

Relative to residential care facilities, the County may consider, but is not limited to, the following factors in determining whether the requested accommodation would require a fundamental alteration in the nature of the County's zoning program:

- Whether the requested accommodation would fundamentally alter the character of the neighborhood
- Whether the accommodation would result in a substantial increase in traffic or insufficient parking
- Whether granting the requested accommodation would substantially undermine any express purpose of either the County's ~~General~~ Policy Plan or an applicable Specific Plan
- Whether the requested accommodation would create an institutionalized environment due to the number of and distance between facilities that are similar in nature or operation

Housing for Homeless People

California housing law has gradually evolved in response to federal mandates and fair housing law, increasing numbers of homeless people, and the need for coordinating service delivery systems. Pursuant to Senate Bill 2, state law now requires that local governments facilitate and encourage the provision of emergency shelters, transitional housing, and permanent supportive housing through land use and permitting processes. Moreover, local government must also identify adequate sites for housing that will be made available through appropriate zoning and development standards to facilitate and encourage the development of these facilities.

Emergency shelter. An emergency shelter is a facility that provides shelter to homeless families and/or homeless individuals on a limited, short-term basis. According to the County's development code, emergency shelters are permitted in any land use district pursuant to an approved conditional use permit. No specific development or management standards are applicable for emergency shelters. The County evaluates such proposals on a case-by-case basis and reviews potential developments as it would others

(need for the project, appropriateness for the site, potential impact on adjacent uses, ability to service site, project design, compliance with development standards, etc.).

Sites available for emergency shelters. The County conditionally permits emergency shelters in the Multiple Residential ~~district~~ zone and permits emergency shelters by right in the General Commercial and Service Commercial districts. Emergency shelters may accommodate up to 60 individuals, provided the minimum space requirements are satisfied. While emergency shelters or low barrier navigation centers may be best located in the incorporated cities and towns adjacent to the unincorporated areas (closer to public services, food stores, and transit), the County has an abundance (dozens of parcels and over 88 acres) of vacant land throughout its communities zoned either General or Service Commercial. The breakdown of where (and how many) people experiencing homelessness were found is as follows: Mountain region: Big Bear City/Sugarloaf/Running Springs (~~13~~8), Crestline (~~22~~13); Valley region: Bloomington (~~19~~11), Muscoy (~~24~~13); East Desert region: Joshua Tree (~~59 (5 sheltered)~~28), Landers (~~2~~4), Morongo Valley (~~5 (all sheltered)~~0); North Desert region: Phelan/Pinon Hills (~~2~~1); and countywide or unknown (18). The overall number of unsheltered individuals is ~~147~~97.

The largest number of unsheltered individuals reported in any single community is ~~54~~28. In each community, there is at least one vacant parcel that could accommodate 60 individuals, indicating that the County's capacity of land with suitable zoning could address the unsheltered need unique to the area. The suitable parcels in the Valley region communities all have access to multiple transit routes and are in close proximity to food-serving and social services in nearby incorporated areas. The suitable parcels in the Mountain and both Desert region communities are all surrounded by local shopping uses and are along at least one route served by local transit. In the Mountain communities, this includes a route that provides access into the City of San Bernardino where social services provided by the County can be accessed, with additional social services provided (Rim Family Services) in the nearby community of Skyforest. In the Desert communities, the extremely low population density and distance from major public facilities means no parcel in any of the Desert communities (of any zone or any development status) will be close to social services. Access to some governmental and medical services is better in and around the East Desert Region, as the County maintains a government center in Joshua Tree and the Hi-Desert Medical Center is also in Joshua Tree.

Low barrier navigation center. In accordance with recent changes to state law, low barrier navigation centers must be allowed by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses. Low barrier navigation centers are defined as a housing-first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. "Low Barrier" means best practices to reduce barriers to entry, and may include, but is not limited to, the following: (1) the presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; (2) pets; (3) the storage of possessions; and (4) privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

3. Housing Constraints

Transitional and supportive housing. The County defines transitional housing as rental housing operating under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Transitional housing typically offers case management and social support services to return people to independent living, typically between 6 and 24 months. Permanent supportive housing is defined as housing with no limit on length of stay, that is occupied by the target population, as defined by Health and Safety Code §50675.14, and that is linked to on-site or off-site services that assist the resident to retain the housing, improve their health status, maximize their ability to live and, when possible, to work in the community. For both transitional and supporting housing, the unit types can be single-, two- or multi-family dwelling units, group residential, parolee-probationer home, residential care facilities, or boarding house. These facilities are subject to the same requirements as a traditional single and multifamily development (supportive housing is allowed by right in the RM Zone).

Housing for Extremely Low Income Households

As described above, the County permits a variety of uses that provide housing options for those households earning less than 30% of the median income. This includes accessory dwelling units and transitional and supportive housing. Due to the low cost and widespread availability of land in unincorporated areas (particularly in communities in the East and North Desert regions), some extremely low income households may be able to ~~can also afford to~~ purchase land, purchase a manufactured home, ~~or pay for a site-built home, pay for the unit to be installed,~~ and ~~establish well and septic systems for less than $150,000~~pay for permitting and utility setup for as little as $100,000. This price, while dramatically lower than housing options elsewhere in the county, would likely still be unaffordable for those households earning 30% or less than the area median income ($26,500 for a household of four). The maximum affordable rent would be $475 to $663 per month for a two-person and four-person household, respectively.

For extremely low income residents/households that are unable to find affordable options with friends or relatives (e.g., adult children continuing to live with their parents), the primary affordable housing option will likely continue to take the form of renting an apartment with multiple roommates, renting a room from a primary occupant, or renting a junior ADU or standard ADU. With the implementation of Program 12, the County will explicitly add single room occupancy (SRO) units (a residential property that includes multiple single-room dwelling units intended for long-term occupancy, with or without cooking facilities) as a permitted use in the RM District, which will expand the potential for housing options that serve extremely low income households. Finally, the Housing Choice Vouchers (HCV) program operated by the Housing Authority of the County of San Bernardino reserves (per HUD requirements) 75% of new vouchers for extremely low income households.~~. As stated in Table 2-17, the maximum affordable purchase price is $108,000 for a two-person household and $149,000 for a four-person household. Roughly 18% of the homes built between 2018 and 2021 in the East Desert Region were built for less than $150,000 (and nearly half of such units were at or below $108,000). The same opportunities are available for a number of communities in the North Desert region, where there is an abundance of vacant and developable land (well and septic). Land in the Valley and Mountain regions is substantially~~

~~more expensive and opportunities for extremely low income households will occur primarily through affordable housing projects, accessory dwelling units, or transitional or supportive housing projects.~~

3.1.4 DEVELOPMENT STANDARDS

Development Intensity Requirements

The Development Code establishes more specific development standards, allowable uses, and limitations. Zoning regulations control development by establishing requirements related to height, density, lot area, yard setbacks, etc. Table 3-3 below provides generalized development standards for the Valley, Mountain and Desert regions. It should be noted that there may be slight variations in the setback standards depending on the region in the County, but the variation is minimal. The main exception is areas designated for specific plans—in that case the specific plan provides more prescriptive development standards than the County Development Code. All other development standards are virtually identical throughout unincorporated areas.

Table 3-3 Residential Development Standards by District and Region

Land Use District									
Rural Living (RL)			Single Residential (RS)			Multiple Residential (RM)			
V	M	D	V	M	D	V	M	D	Development Standard
-	-	-	-	-	-	11	5	5/11[1,2]	Minimum density (du/ac)
0.4	0.4	0.4	4	4	4	20/30	20/25	20/25	Maximum density (du/ac) [3]
25	25	25	25	15/25[4]	25	25	15/25[4]	25	Setback, front (ft)
15/25[5]	25	15/25[5]	15/25[5]	15	15/25[5]	15/25[5]	15	15/25[5]	Setback, side, street-side (ft)
5-15[6]	20	5-15[6]	5/10[7]	15[8]	5/10[7]	5/10[7]	15[8]	5/10[7]	Setback, side, interior (ft)
15	20	15	15	15	15	15	15	15	Setback, rear (ft)
20	20	20	40[9]	40	40[9]	60	60	60	Maximum lot coverage (%)
35	35	35	35	35	35	45	45	45	Maximum height (ft)

Source: County of San Bernardino Development Code, 2021.
1. In areas served by piped water, sewer, and paved roads, the minimum density shall be 11 units per acre.
2. If a parcel is adjacent to a lower density LUD and is not required to connect to sewer, the parcel can subdivide and/or develop below the minimum density.
3. The maximum density may be greater when modified by Chapter 83.03 (Affordable Housing Incentives – Density Bonus).
4. For lots smaller than 14,000 square feet, the front setback must be at least 15 feet; for larger lots, the setback must be at least 25 feet.
5. For side setbacks along a local street, the minimum setback must be at least 15 feet; for collector or wider, the setback must be at least 25 feet.
6. For lots 75 feet wide or less, the minimum side setbacks on interior conditions must be at least 5 feet on one side and 10 feet on the other; for all other lots the setback must be at least 15 feet.
7. The minimum side setbacks on interior conditions must be at least 5 feet on one side and 10 feet on the other.
8. The minimum side setbacks on interior conditions must be at least 20% of the lot width, but not to exceed 15 feet.
9. The maximum lot coverage for a lot smaller than 20,000 square feet shall be the entire building envelope.

Historically, the County allowed housing development ranging from a maximum of 0.4 unit per acres in the Rural Living (RL) district and up to ~~14~~ 20 units per acre in the Multiple Residential (RM) District. This reflects infrastructure needs and physical constraints in unincorporated areas. ~~To improve the potential for affordable housing and limit or remove inhibitors, the County revised the RM District standards to increase densities up to 20 du/ac and amended the ordinance to preclude single dwelling structures in the RM zone to ensure only multiple-family housing is developed~~To avoid the dilution of

development capacity for multifamily housing in the RM District, single family housing is not permitted in the RM District.

To incentivize affordable housing, County Development Code Chapter 83.03 provides for a local density bonus in the RM District. The density bonus applies prior to the application of state density bonus provisions for projects with at least 20% of the proposed housing units for lower income households. For such projects, the maximum density is increased from 20 units per acre to 25 units per acre in the Mountain region and 30 units per acre in the Valley and Desert regions for sites served by piped water, sewer, and paved roads. The increased maximum density can then be used as the base maximum density by which state density bonus is calculated.

Historically, higher density projects (e.g., apartments) built in the unincorporated areas did not meet current standards for a quality living environment. Many apartments built between 1970 and 2000 exhibited poor design, lack of amenities, inadequate infrastructure, and other deficits. When apartments are constructed in this manner, they often are not maintained in an appropriate manner, and eventually become a disincentive for surrounding cities to propose annexations that include such structures. Accordingly, in 2007, the County adopted an incentive-based density threshold for multifamily developments (based largely on successfully implemented tiered density thresholds from the cities of Fontana and Rancho Cucamonga).

The allowable density depends on the number and type of recreational amenities. For 2 points worth of amenities, the project can be built at 75% of the maximum density. For 4 points of amenities, developers are allowed 85% of the maximum density. Projects with 8 points can receive 100% of the allowable maximum density, which is 20 units per acre. Examples of amenities and their point values are listed below. Note that this density limitation does not apply to projects that reserve at least 20% of units for lower income households.

- 1 point: passive water feature, picnic/barbeque area, tot lot, passive recreation, or garden
- 2 points: playground, community garden, volleyball court, water feature, basketball hoop
- 3 points: basketball court, restroom area, child wading pool, tot lots, half-scale soccer field
- 4 points: childcare facility, exercise room, swimming pool, tennis court, recreation hall

Requests to Develop Housing at Densities Below Those in the Sites Inventory

The development assumptions cited in the analysis of capacity on vacant land (see Section 4.4) are 20 units per acre in the Desert Region and 25 units per acre in the Valley Region for land designated with RM zoning, provided there is access to piped sewer and water (out of a maximum density of 30 units per acre). Prior to 2021, the County permitted a maximum of 20 units per acre but permitted a minimum multifamily as low as 5 units per acre. In 2021, prior to the start of the planning period, the County introduced local density bonus provisions that boosted the maximum density to 30 units per acre and raised the minimum density to 11 units per acre.

An analysis of past development on land designated with RM zoning indicates that most development applications sought densities between 10 and 16 units per acre. Recent examples include multifamily housing in the unincorporated SOI of the cities of Fontana and San Bernardino, where three projects (14 to 16 units per project) are currently being built at a density of 12 to 14 units per acre. Evidence of a desire for densities above 20 units per acre can be found in recent multifamily projects (see list below) developed through special development zoning, specific plans, or area plans (all of which were used in place of the RM zoning). The design and entitlement process for the projects listed above and below started prior to the adoption of the local density bonus provisions and they may have sought higher densities through RM zoning had the revised regulations been in place at the time of project conception.

- Las Terrazas: 18.9 units per acre (affordable, SD District)
- Bloomington Grove Phase III: 20.8 units per acre (affordable, specific plan)
- Bloomington Grove Phases I & II: 21.1 units per acre (affordable, specific plan)
- The Standard: 29.6 units per acre (market rate, area plan)
- The Crossings: 37 units per acre (market rate, area plan)
- CR The Redlands: 42 units per acre (market rate, area plan)

The County believes that the recently adopted local density bonus provisions, which allows multifamily projects to reach 30 units per acre without the need of state density bonus provisions or a specific/area plan, will incentivize development on land with RM zoning at densities above the historical range of 10 to 16 units per acre.

Parking Requirements

Adequate parking is a necessary part of any quality residential development. Parking is needed to accommodate normal vehicle ownership patterns on site, rather than requiring offsite parking along streets. Having adequate parking has been shown to improve the prospects of financing a project, improve rents or sales prices, and improve the overall livability of residential projects. However, excessive parking requirements can reduce the amount of land available for development, lowering the achievable density of development. The County has established parking standards to ensure the provision and maintenance of safe, adequate, well-designed, off-street parking facilities in conjunction with a use or development and to reduce street congestion and traffic hazards. Table 3-4 summarizes applicable parking requirements for residential development.

Parking requirements for multifamily development with four or more units, while greater compared to single family homes, includes guest parking and is not considered onerous or a constraint. Additionally, rates of car ownership are higher in inland counties (especially unincorporated areas) that are not as well served by mass transit and are farther from employment and services. For example, even in the unincorporated community of Bloomington, which is fairly well-served by transit, over 71% of rental

households own two or more cars. The relatively low cost of land in the unincorporated county enables multifamily developers to acquire parcels that are adequately sized and can accommodate the number of required parking spaces. For example, a hypothetical 100-unit housing development would be required to provide 250 off-street parking spaces for residents and guests. The amount of land equivalent to the difference between the requirement of 2 versus 2.5 parking spaces is about 15,000 square feet or roughly one-third of an acre. The delta is even smaller on a hypothetical 20-unit housing development (3,000 square feet or less than one-tenth of an acre). Based on this information and an assessment of the vacant parcels identified as candidate sites suitable for multifamily housing, vacant sites available are large enough to accommodate the currently required parking spaces while also accommodating all of the other on- and off-site requirements and standards.

Table 3-4 Residential Parking Requirements

Type of Dwelling	Parking Requirement
Single family	2; 1 shall be covered on the same site with the primary structure
Multifamily	2.5 per unit for projects of 4 or more units, inclusive of guest parking; one shall be covered 2.0 for projects of 2 or 3 units, inclusive of guest parking; one shall be covered
Mobile home parks	2; 1 covered for each unit (may be tandem); and 1 guest space/10 spaces, or fraction thereof
Dependent housing	2 for each unit
Caretaker housing	2; 1 shall be covered
Group residential	1 for each bedroom, plus 1 for the house manager, staff member, or employee
Accessory dwelling unit	1 uncovered for each unit or 0 if the unit is a junior ADU, is part of an existing primary residence or a converted accessory structure, is within one-half mile walking distance of public transit, is within an architecturally and historically significant historic district, or other conditions per Section 84.01.060(f)(5) of the Development Code
Emergency shelter	1 for each guest room
Licensed residential care facility of ≤ 6 persons	2, 1 shall be covered on the same site with the primary structure
Unlicensed residential care facility of ≤ 6 persons	1 for each bedroom, plus 1 for the house manager, staff member, or employee
Licensed residential care facility of 7+ persons	
Unlicensed residential care facility of 7+ persons	
Short-term rentals	1 for each occupant/guest

Additional parking reductions are available in certain conditions. Parking reductions up to 10% of the total required parking spaces may be granted for transportation control measures pursuant to an approved Conditional Use Permit/Minor Use Permit. Appropriate landscaping may be provided in lieu of 10% of the total number of parking spaces required, provided the landscaping is arranged so that parking may be installed at a later date if a demand arises. Affordable housing that complies with state density bonus law is eligible for state-mandated reductions in parking pursuant to state density bonus law. Parking is not deemed a constraint to the production of market rate or affordable housing.

In response to concerns and evidence of parking requirements being a constraint for the development of emergency homeless shelters, state law recently changed prohibiting a jurisdiction from requiring more

parking spaces for an emergency shelter compared to other residential and commercial uses. The County of San Bernardino maintains parking requirements with the intent of adequately serving the facilities without hindering development potential. The County evaluated its parking requirements for emergency shelters and determined that the parking requirements are comparable or lower than similar uses, such as hotels, motels, short-term rentals, residential care facilities, and group residential such as a boarding house. The County also requires fewer parking spaces for emergency shelters compared to multifamily housing developments.

The County currently requires one parking space for every room in an emergency shelter and 2.5 spaces for every unit in a multifamily residential development. A shelter providing 60 beds (maximum allowed) at a ratio of 4 beds per room would need 15 parking spaces. If the same size shelter provided 2 beds per room, for a total of 30 rooms, 30 parking spaces would be required. Assuming an average household size of 3 persons, 20 multifamily units (total population of 60) would require a total of 50 parking spaces. A small emergency shelter providing 10 beds at 4 beds per room would need 3 parking spaces. The same size shelter providing 2 beds per room would need 5 parking spaces. By comparison, a small multifamily complex with 3 units would require at least 7.5 parking spaces.

On- and Offsite Improvements

The County requires varying levels of on- and off-site improvement based on the region and community context in which a residential development project is proposed. The County promotes a more suburban development pattern throughout the entirety of the Valley region and requires standard levels and types of improvements needed to ensure safety and connectivity, with an intent of aligning with adjacent incorporated cities and towns. In the Mountain and Desert regions, new residential development is intended to reflect a rural lifestyle that requires fewer improvements. In the Valley region and parts of the Desert and Mountain regions where substantial development has already occurred, substantial improvements are not required as the existing systems and infrastructure have already been developed. In such cases, the costs of on- and offsite improvements are minimal and do not serve as constraints on development.

Street Right-of-Way and Sidewalks

A formula is used for new development to calculate the required dedication based on regional location. In the Desert regions, a 44-foot half width, drawn from the centerline, is required for properties fronting section lines, and a 30-foot half width is required for properties fronting sixteenth section lines. In the Mountain region, a 20-foot half width from the centerline is generally required; however, the Director of Land Use Services and Director of Public Works may jointly agree to reduce the requirement to a minimum of 10 feet in extraordinary circumstances. In the Valley region, the required dedication is determined by the road widths established in the Countywide Plan following review and approval by the Director of Land Use Services and Director of Public Works. In nearly all parts of the Valley region, the roadways around residentially-zoned but undeveloped lots already exist and the lot sizes are large enough that any roadway dedication requirement would not impact development feasibility.

Roads are required to be paved in all parts of the Valley region while only mountain highways in the Mountain region and major highways in the Desert regions must be paved. In the Valley region, the roadway dedication includes curbs, gutters, and sidewalks of 4 to 6 feet for collectors and 8 to 12 feet for highways. In the Mountain and Desert regions, where roads are required to be paved, curbs and gutters or berms are required but sidewalks are not.

Streetlighting Requirements

There are over 3,500 residential streetlights throughout the unincorporated county, all of which are owned by Southern California Edison (SCE). Across various location in the unincorporated county, the installation, maintenance, and energy costs are paid through 13 different special districts (e.g., County Service Areas, each of which are funded by property taxes of those who live within the specific area). For new residential development within a special district that does fund streetlights, the development must coordinate with SCE to fund the installation of new streetlights (distance varies by location, topography, and road alignments), with maintenance costs funded by the entire special district. Otherwise, there are no requirements for streetlights.

Water and Sewer Connections

In most developed parts of the county, water is supplied by a public water system. For areas not served by a public water system, individual wells are used. New development may only use a well if the underlying aquifer is not in a state of overdraft. On-site septic systems are common throughout much of the unincorporated county. New development may be required to connect to sewer systems if deemed necessary for health and safety by the County Environmental Health Services Division. In such areas that require connections into public water systems or sewer systems, the connection costs are relatively nominal. The current capacity of the various sewer systems maintained by various special districts throughout the unincorporated county have enough wastewater treatment capacity remaining to avoid substantial cost increase (and even then, new development would only be charged its fair share, as the cost to expand wastewater treatment would be spread across the entire service area).

Cumulative Impact of Development Standards

The County's residential zones contain development standards relating to density, height, setbacks, parking and maximum lot coverage. As the County does not require a minimum amount of open space for each parcel, the only requirements that consume developable areas are setbacks and parking. In the RL and RS zones, which allow 0.4 and 4 units per acre, respectively, the development standards allow construction to achieve the highest end of the density range on any lot that meets the minimum lot size requirements. The RM zone allows up to 20 units per acre without affordable housing. On a sample one-acre lot (which is actually relatively small compared to most lots in the unincorporated areas), setbacks would consume up to just over one-third of the lot and parking (when provided in a surface lot format) would consume another third (calculated at 2.5 spaces per unit and 300 square feet per space), leaving roughly 12,500 square feet of buildable space controlled by a maximum height limit of 45 feet. Even only assuming three stories of development (which would most likely only reach 30 to 35 feet in height), each of the 20 units could be an average of 1,500 square feet (after accounting for a 20% reduction for

common areas, whether internal or external). Such units could easily contain up to three bedrooms while still providing large common living and kitchen areas.

Projects with affordable housing can reach up to 25 or 30 units per acre with affordable housing in areas that also have access to piped water and sewer. This density was not analyzed as affordable housing developments are also entitled by state law to concessions including reduced parking standards that ensure the housing development can reach the maximum density requested.

Building Codes and Enforcement

The County implements and enforces building codes, property maintenance standards, subdivision improvement requirements, and other municipal codes to ensure quality housing and neighborhoods for residents. Although building code requirements raise construction costs, the public interest is best served when buildings adhere to proper construction and engineering practices and neighborhoods have appropriate infrastructure suitable to their design.

Every three years, the State of California adopts new codes that contain the latest advances in construction practices and engineering concepts. The California Building Standards Commission adopts the California Building Code based on "models" produced by professional organizations. Local agencies must adopt these codes, but may make amendments to address geological, climatic, or topographical conditions provided modifications are no less restrictive than the state standards.

The new state codes incorporate, by reference, the model codes published by the International Code Council, which recently consolidated multiple regional codes into a single set of codes applicable throughout the United States. The County of San Bernardino has adopted the following building codes to reflect the latest advances in construction technology and building practices.

- 2019 California Residential Code
- 2019 California Electrical Code
- 2019 California Plumbing Code
- 2019 California Mechanical Code
- 2019 California Energy Code
- 2019 California Historical Building Code
- 2019 California Fire Code
- 2019 California Existing Building Code
- 2019 California Green Building Code

3. Housing Constraints

In the more rural areas, building codes were amended to increase the distance between water wells and septic systems and ponds in an effort to improve water quality. Other amendments were made that only refer to minor administrative processes. Such amendments do not materially increase the cost of residential construction and are similar to the amendments adopted in jurisdictions throughout the County. Therefore, the new building codes do not present a potential or actual constraint to the development, maintenance, and improvement of housing.

New residential construction must comply with the federal Americans with Disabilities Act (ADA). ADA provisions include requirements for a minimum percentage of units in new development to be fully accessible to the physically disabled. Enforcement of the ADA requirements is not at the discretion of the County but is mandated under federal law. Compliance with building codes and the ADA may increase the cost of housing production and can also impact the viability of rehabilitating older properties—it can be cost prohibitive to bring them up to current code standards. These regulations, however, provide minimum standards that must be complied with to ensure the development of safe and accessible housing. As stated in the discussion on permitted uses, the County provides people with disabilities with reasonable accommodation in rules, policies, practices, and procedures necessary to ensure equal access to housing.

Residential code enforcement in unincorporated areas is performed on a complaint basis. If a particular health and safety problem arises in a neighborhood or with a particular property, code enforcement initiates an enforcement program to solve the problems. The County Code Enforcement Division administers programs designed to protect the public's safety, welfare, and property value through enforcement of County ordinances and state/federal laws relating to land use, zoning, housing, public nuisances, and vehicle abatement in the unincorporated areas.

The Renewable Energy and Conservation Element contains specific goals and policies to ensure efficient consumption of energy and water, reduce greenhouse gas emissions, pursue the benefits of renewable energy, and responsibly manage its impacts on the county's environment, communities, and economy.

The County has also promoted energy conservation for residential uses on educational and regulatory levels. The County supports local utilities in their efforts to provide public information and technical assistance to developers and homeowners regarding energy conservation measures and programs. On a regulatory level, the County enforces the State Energy Conservation Standards (Title 24, California Administrative Code). Compliance with Title 24 of the California Administrative Code on the use of energy efficient appliances and insulation has reduced energy demand stemming from new residential development.

Under the 2019 Building Code (in effect as of January 2020), all new single-family homes and low-rise apartment buildings will be required to install solar panels, or tap into community solar power, to compensate for all electricity used by the building (aka zero net energy homes). Homes that truly are not suitable for solar, e.g., shaded by trees or large buildings would be exempt.

While the construction of energy efficient buildings does not necessarily lower the purchase price of housing, it should reduce monthly occupancy costs as consumption of fuel and energy is decreased. Similarly, retrofitting existing structures with energy-conserving features can reduce in utility costs. Examples of energy conservation opportunities include weatherization programs and home energy audits; retrofit to dual components or piggyback the use of evaporative coolers with air conditioning systems; installation or retrofitting of more efficient appliances and mechanical or solar energy systems; and building design and orientation.

3.1.5 PERMITTING PROCESSES

San Bernardino County maintains a variety of permit processing and review tools to ensure the appropriate level of staff and public review. The County is sensitive to time pressures faced by the development community and balances the need for a timely review with the public duty to approve only high quality projects that minimize negative impacts and promote a healthful environment. Although many uses are permitted by right, the County of San Bernardino requires the approval of certain planning permits to ensure quality development.

Pre-Application Development Review

The County of San Bernardino actively seeks to facilitate the approval of residential development projects and has developed several tools to achieve that goal. One such tool is the Pre-Application Development Review. Applicants may request a free pre-application conference with the Development Review Committee to determine the consistency of a proposed project with the requirements of the Development Code. This is a free service provided by the County to allow applicants the ability to review the proposed project. This allows the developer to understand the project requirements and tailor the project application to meet requirements, reduce the number of iterations otherwise required, and expedite review.

Site Plan Permit

The site plan permit is an expedited process for project review and authorization of permitted uses and structures. This permit procedure is intended to provide a less complex and more streamlined administrative review focused on verifying compliance with the County Development Code. Surrounding property owners receive notice of a pending decision, with an opportunity to provide comments or appeal the decision. The review authority for the site plan permit is the Director of the Land Use Services Department, with potential appeal to the Planning Commission. The actions of the Planning Commission may be repealed by the Board of Supervisors within ten (10) days following the date of the action. However, projects located in a city's sphere of influence, a designated redevelopment area, or fronting a State Highway are not eligible for this permit due to the need to involve the sphere city or state agency in the review process. In such cases, it would require the review and approval of a Minor Use Permit (MUP) or a Conditional Use Permit (CUP).

The site plan permit is applicable to new construction and reuse of existing structures in compliance with all requirements of the County Development Code. Discretion is strictly limited to standard findings that the project complies with applicable standards of the Development Code; that there is supporting

infrastructure existing or available to serve the project; that the use is consistent with the General Plan and any applicable community plan or specific plan; and that the proposed use and manner of development are exempt from CEQA. If the review authority cannot make the required findings or the project is in a city sphere of fronting a state highway, then the project may be elevated to a minor use permit, at the discretion of the Director of Land Use Services.

Minor Use Permit

The County has adopted a minor use permit (MUP) process to review the location and operation of certain types of land uses, such as multiple-family residential developments of 20 to 49 units. Projects are evaluated for consistency with the general plan, compatibility with surrounding land uses, availability of public services, and potential environmental impacts. The MUP is designed to allow staff-level review for minor projects and noncontroversial medium-scale projects. These uses, although generally deemed consistent with the respective land use district, typically have a character that requires special consideration in order to avoid conflicts with surrounding land uses.

For projects to qualify for review through the MUP process, the County staff reviews the proposal for environmental impacts and compliance with County development standards. Since projects processed with an MUP do not require a public hearing, the MUP serves as an administrative approval of a proposed project. Projects processed under an MUP take an average of only three months. The MUP is an incentive to property owners to comply with the County's specified criteria in order to receive expedited approval. In particular, offering full and complete review without proceeding to the public hearing stage, which can add months or even years to the schedule, offers a key incentive for housing projects, including affordable housing.

To secure a minor use permit, the review authority shall first find and justify that all of the following additional findings are true before approving a minor use permit application.

(1) There are no circumstances that would result in standards or conditions not being able to adequately mitigate environmental impacts.

(2) The project is planned for immediate development and does not include a phased development.

(3) The project is not likely to result in controversy.

If the proposed project fails to satisfy any of the findings identified in this subsection, it shall only be processed as a conditional use permit in compliance with this chapter. It is important to point out that the mere fact that a project has affordable units or is higher density does not, by itself, render a project controversial and subject to a conditional use permit. The County is generally seen as developer friendly, seeking to attract new residential development whenever possible. However, certain projects in specific locations may generate controversy in terms of environmental impacts. The reasons for these findings are unique to San Bernardino County. The environmental impacts issue is clearly to address the conditions of the California Environmental Quality Act (CEQA). Projects that require significant mitigation should undergo more thorough review that would likely come in the form of public hearings. Phased development also poses a concern because, in recent years, phased projects have often stalled, been

altered midstream, or not fully complied with developer agreements, placing a strain on the provision of County services.

Conditional Use Permit

If a project cannot be processed administratively or through a MUP, a conditional use permit (CUP) will be required. The CUP process reviews appropriate uses and activities in the applicable land use district, but whose effects on a site and surrounding area need to be determined prior to being proposed as an official site. Conditions that automatically require a CUP are natural slopes of 30% or greater, projects that exceed size thresholds in certain zones, projects that use hazardous materials, projects requiring a health risk assessment, multiple-family projects of 50 units or more, and other specific uses. A CUP is the means by which the County can appropriately evaluate the suitability and operation of certain land uses for consistency with the County general plan, compatibility with surrounding land uses, availability of public services, and potential environmental impacts.

Once a development application is complete, a project planner reviews the proposal for environmental impacts and compliance with County development standards. Project information is also distributed to County departments for comment, and surrounding property owners are notified. Tracts and large-scale housing projects are also reviewed by the Development Review Committee (DRC), which is a staff technical review body. If the project meets all relevant requirements, County staff will recommend approval of the CUP by the Planning Commission subject to the standard findings with conditions to protect surrounding uses, the environment, and the health, safety, and general welfare. Planning Commission decisions are appealable to the Board of Supervisors.

The review authority shall first find and justify that all of the following are true before approving a conditional use permit or minor use permit application.

(1) The site for the proposed use is adequate in terms of shape and size to accommodate the proposed use and all landscaping, loading areas, open spaces, parking areas, setbacks, walls and fences, yards, and other required features pertaining to the application.

(2) The site for the proposed use has adequate access, which means that the site design incorporates appropriate street and highway characteristics to serve the proposed use.

(3) The proposed use will not have a substantial adverse effect (e.g., excessive noise, traffic, vibration, or other disturbance) on abutting property or the allowed use of the abutting property nor substantially interfere with the present or future ability to use solar energy systems.

(4) The proposed use and manner of development are consistent with the goals, maps, policies, and standards of the general plan and any applicable community or specific plan.

(5) There is supporting infrastructure, consistent with the intensity of development, to accommodate the proposed development without significantly lowering service levels.

(6) The lawful conditions stated in the approval are deemed reasonable and necessary to protect the public health, safety, and general welfare.

(7) The design of the site has considered the potential for the use of solar energy systems and passive or natural heating and cooling opportunities.

Typical standard conditions include requirements related to continuous effect/revocation, revisions, expiration, extension of time, development impact fees, indemnification, trust account, condition compliance, additional permits, continuous maintenance, performance standards, lighting, clear sight triangle, and underground utilities. These conditions were applied to projects ranging from market rate residential development such as CR The Redlands (360 units) to affordable housing such as Las Terrazas (112 units). For example, a sample of the 124 conditions of approval for the Las Terrazas Mixed-Use Affordable Housing and Childcare development are listed below.

- Project signs and activities shall be consistent with the project description
- The County grant extension to building plan approvals provided they are consistent with the State Building Code template
- Proposed changes to the approve use or activity of the site or increase in the developed area shall require review by County Planning
- Conditions are in effect for the life of the project
- Permit expires if not exercised within three years unless extension approved
- Extension of time may be granted with adequate justification
- Fees shall be paid as specified in the adopted fee ordinance
- Developer shall indemnify the County arising out of acts of errors or omission
- Actual cost job project account to be created (accounting)
- CEQA process was completed and associated fees must be paid and final notice filed
- Condition compliance release form required at each stage of permitting and inspection
- Other required permits obtained from agencies related to project tenant use
- Property will be maintained and subject to annual maintenance and repair inspections
- No impermissible odors, emissions, smoke, radiation, toxic gases, or glare
- Clear sight triangle at public rights-of-way
- No new above ground power or communication lines extended to the site (all underground)
- Construction activities in accordance with time and date standards

While the conditions of approval are extensive, the developers involved in these projects indicated that the County's conditions are conventional, are less onerous compared to incorporated jurisdictions, and did not create any delay, cause for concern, or unnecessary or unexpected costs. Overall, the CUP process and requirements are not considered to hinder the development of housing in the unincorporated county.

Planned Development Review Process

The planned development review process is used to facilitate the development of properties where greater flexibility in design is desired than would otherwise be possible through the strict application of standard land use district regulations in the County Development Code. The process serves as an alternative site planning process that encourages a more creative planning of mixed-use, multiphase developments within the framework of a single, cohesive development plan. All applications for preliminary or final development plans must be reviewed by the DRC prior to review by the Director of Land Use Services, Planning Commission, or Board of Supervisors. The Director of Land Use Services reviews and acts upon all applications for final development plans, provided that the projects have been determined to be noncontroversial, no member of the DRC objects to the proposed project, and the project is consistent with the approved preliminary development plans.

Development Processing Time

San Bernardino County review process times conform to state law requirements but can vary depending upon the complexity of the project and applicant response time for submittals and corrections. Current approximate processing times for applications related to development projects are displayed in Table 3-5. Affordable housing applications are expedited through the approval procedures, and decisions are made in a timely manner given statutory notice and environmental requirements. Discussions held with affordable housing developers such as the Southern California Housing Development Corporation indicate that the County's permitting and processing time procedures are not a constraint to the production of affordable housing. Even the County's conditional use permits requirement for larger, potentially controversial projects is not considered a significant constraint.

Based on the past few years of development activity, once applicants obtain entitlement, the applicants are filing for and obtaining finalized building permits within 6 to 12 months (both for single family and multifamily projects). The vast majority of single family projects that occur outside of this range proceed through this stage of the development process faster (less than six months). The County offers the ability for applicants to select from stock plans and to submit planning and building permit applicants concurrently, with both options reducing time and costs. Additionally, the County offers in-person or virtual inspections, with the latter allowing applicants to upload pictures or to participate through video chat, saving both the County and applicant time and money and allowing the County to expedite inspection times and accommodate a larger workload without expanding resources.

Table 3-5 Typical Development Processing Time

Review Process	Single Family Residential Project	Multifamily Residential Project	Typical Time to Decision from Time of Acceptance
Site Plan Review	Yes	Yes	2 to 3 months
Minor Use Permit	N/A	20 to 49 units	3 to 6 months
Conditional Use Permit	N/A	50+ units	6 to 9 months
Environmental Documentation	Only if discretionary approval required		1 month IS/ND; 6 to 12 months EIR
General Plan or Zoning Amendments/Zone Change	Typically not required		6 to 12 months

Short-term Rental Permit

Short-Term private home rental permits are required for private homes, located in the Mountain and Desert regions, that are rented for periods of thirty days or less. Permits are required to ensure specific standards are met. Some of the requirements include a limitation of occupants and vehicles, 24-hour availability to resolve complaints, and compliance with relevant fire, building, zoning and health and safety codes. The following types of housing are not eligible for use as a short-term rental: multifamily structures, yurts, travel trailers, and RVs throughout any part of the unincorporated county; and any home in the Valley region. Through the implementation of Program 4, the County will evaluate and address the potential impact of short-term rentals on the availability and/or affordability of housing in the unincorporated areas. The County will also, through Program 4, ensure that no short-term rentals are counted toward the County's RHNA allocation. By their very nature, short-term rentals are not considered to be permanent housing options (by contrast monthly apartment rentals offer the ability to renew and occupy the same unit repeatedly). Accordingly, no analysis of the permitting process is provided.

3.1.6 DEVELOPMENT FEES

The County of San Bernardino charges a range of development fees and exactions to recover the costs of processing the applications for new housing. As in the past, the County fees for processing applications are significantly lower than surrounding jurisdictions. Moreover, as discussed later in the infrastructure section, the County of San Bernardino does not charge impact fees. As summarized below, at least 75% of fees and taxes for new development are levied by agencies (water purveyors, sanitation agencies, school districts, etc.) that are not under the County's control.

As shown in Table 3-6, the average development fees (costs can vary lower or higher depending on location) is $22,000 to $24,000 for single-family units, though the amount can be as low as $12,000 to $14,000 for sites that can be developed using water wells and septic systems. Multiple-family housing fees are lower at about $12,000 per unit, due in part to the beneficial effect of increased density spreading costs over more units. For housing projects that connect to water and sewer systems, the average fee burden represents 8% to 15% of building valuation. This is far below the average fee burden of 20% to 25% seen in many incorporated communities.

Housing projects in the Valley region are assessed higher transportation fees but often have lower costs for water and sewer connection. Even after assuming the highest transportation fees in the Valley region and maintaining average water and sewer costs, total development fees are about $28,000 or 14% of building valuation for single family homes and $14,000 or 9% of building valuation for multiple family projects. Based on an analysis of fees, even in areas where transportation fees are higher, the local and regional fees are not considered to be a constraint to affordable or market rate development.

In 2019, state law changed to require increased transparency for residential development project applicants through the web-based publication of current fee schedules, zoning ordinances, and other information. The County currently provides its Development Code online through American Legal Publishing (with a direct link provided on the County's website). The County also publishes an interactive

fee schedule on its website (wp.sbcounty.gov/ezop/feesearch) that is designed to display fees based on the type of development (residential or commercial), the general type of activity (e.g., new construction), the specific type of activity (e.g., single family home), the type of fee (e.g., deposit vs fee), and the type of department (e.g., Planning).

Table 3-6 Average Development Fees

Category of Fee	Manufactured Home [1]	Single Family Home [2]	Multiple Family Project [3]
County Fees per Unit			
Planning (PD or CUP)	$0	$0	$350
Building & Safety	$762	$2,605	$587
Public Works & Land Development	$2,156	$2,156	$162
Fire Department	$372	$372	$81
Local & Regional Fees per Unit			
Transportation Fee (SBCTA) [4]	$3,653	$3,653	$3,036
School Fees [5]	$4,890	$4,890	$2,700
Water/Sewer Connection & Fees [6,7]	$10,602	$10,602	$5,107
Total Fees & Permits Costs per Unit	$22,435	$24,278	$12,023
Estimated Valuation per Unit	$150,000	$202,059	$157,709
Fees/Costs as a Percent of Value	15% [8]	12% [9]	8%

1. Manufactured homes reviewed at a flat rate regardless of size.
2. Single family home: 1,650 square feet, site built, custom home, Type V (wood-frame) construction.
3. Multiple family dwelling project: 236-unit project, average unit size of 957 square feet.
4. Costs may be lower or higher depending upon location of project. Figures in table represent an average of areas within and outside unincorporated spheres of influence (SOIs). Development in the Valley region is typically charged a higher fee; the highest is $7,895 for single family and $5,486 for multiple family in the Rialto SOI (which contains Bloomington).
5. Costs may be slightly lower or higher depending upon location of project and school district.
6. For single family and manufactured homes, costs may be lower or higher depending upon location of project and presence of existing systems and capacity. Costs may be as low as $1,151 for housing using well and septic. When a water connection is not available, a well is required and has deposit fee of $401 for a well permit. When sewer is not available, a septic system is required and has a $750 fee for plan review, percolation test review, and permitting.
7. For multiple family projects, costs may be lower or higher depending upon location of project and presence of existing systems and capacity. Cost assumptions include construction of 8-inch water line, waterline frontage, and laterals; plan check and permit; other miscellaneous water fees; sewer capacity charges, extension of sewer line and construction of laterals; and inspection fees.
8. If the manufactured home is developed with well/septic, the percentage lowers to 9%.
9. If the single family home is developed with well/septic, the percentage lowers to 7%.

3.2 NONGOVERNMENTAL CONSTRAINTS

Over the last 20 years, the cost of all housing in San Bernardino County has increased as the cost of each component increased. During the past decade, costs have continued to increase, ~~but at~~with some increasing at a ~~much~~ slower rate than in previous years. The major components of housing costs are land, labor, materials, financing, overhead, and profit. The cost of each of these will vary significantly depending on the location of the development and the type of house being built.

3.2.1 LAND AND CONSTRUCTION COSTS

Land Costs

3. Housing Constraints

Land costs are a common constraint to building affordable housing in southern California jurisdiction. The cost of land can also vary significantly across unincorporated areas of San Bernardino County. In the more developed portions of the Valley communities, land costs are typically $200,000 to $750,000 per acre. In the Mountain communities, where developable land is more limited due to topographical constraints, land costs range more widely from around $25,000 to $500,000 per acre. In the Desert communities, land costs are much lower due to widespread availability, with values that range from $10,000 to $90,000 per acre. In many parts of the unincorporated areas, land costs are not a significant constraint the production of market rate or even affordable housing. See Table 2-19 to see the range of land costs based on parcel size for single family homes built between 2018 and 2021.

Construction Costs

The cost of construction depends primarily on the cost of materials and labor, which are influenced by market demand. Construction costs depend on the type of unit being built, the materials purchased and used, and the quality of product being produced. Hard constructions costs, such as labor and construction materials, are significant drivers in the increasing costs of housing developments. Recent studies demonstrate that hard costs make up more than 60% of the total cost of production for new residential developments in the past decade in the state of California.

A rise in the cost of materials is another contributor to the increased cost of construction. Wood, plastics, and composites doubled in price between 2014 and 2018, with costs only reported to be higher in 2019 through 2021. Regarding wood prices, various news articles cite that mill operators and lumber dealers forecasted demand based on soft 2019 and 2020 market and pulled back on production capacity for 2020. This caused prices to spike with demand for home renovations rising unexpectedly during the COVID-19 Pandemic. More recent information, however, indicates that wood prices may be able to return to their more typical prices by 2022 as the industry increases production capacity to match demand. Increasing costs associated in part with an increasing tightness in the market for skilled labor, with California general contractors indicating difficulty in finding workers such as plumbers, pipelayers, roofers, equipment operators, drywall installers, cement masons, concrete workers, carpenters, and welders. As the ability to find skilled labor becomes more difficult and takes longer, the additional time leads to further financing costs and uncertainty, resulting in higher housing costs for the builder and future occupant(s).

Recent advances in technology and quality have resulted in increasing use of prefabricated and factory-built housing. By shifting much of the job site work to a controlled environment, factory-built housing reduces labor and cycle time on job sites and increases accuracy of work. Manufactured housing continues to be a good source of affordable housing built without subsidy. As shown in Table 2-18 in the previous section, 62 of 96 manufacture homes built between 2018 and 2021 were sold at rates affordable to lower income households, and all but one were affordable to lower or moderate income households.

Additionally, a number of companies around the world are pushing the envelope of what is possible, and there is a critical mass of thought, research, development, and money being invested into new methods of housing construction. 3D printing, for example, challenges both traditional structural forms as well as the building process. The first 3D-printed zero net energy homes community will be completed in

Rancho Mirage in 2022 (in the eastern desert/Coachella Valley part of Riverside County). The company behind the development, Mighty Buildings, claims that the process can cut time in half and reduce labor hours by 95% while producing 10 times less waste than conventional construction.

3.2.2 FINANCING RESIDENTIAL CONSTRUCTION

The affordability of owning a home is greatly influenced by mortgage interest rates. Increases in interest rates decrease the number of persons able to purchase a home. Conversely, decreasing interest rates result in more potential homebuyers introduced to the market. Mortgage interest rates for new home purchases ranged from 3% to 5% for a fixed-rate, 30-year loan between 2016 and 2020, with an average rate of approximately 3.11% in 2020. Since the historic lows during the COVID-19 pandemic, the easing of the pandemic and other global and national events have led to a gradual rise in interest rates, with average rates ranging from 4% to 5.5%.

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. First-time homebuyers are the group impacted the most by financing requirements. Lower initial rates are available with graduated payment mortgages, adjustable-rate mortgages, and buy-down mortgages. However, variable interest rate mortgages on affordable homes may increase to the point of interest rates exceeding the cost of living adjustments.

Flexible loan programs, such as those for first-time homebuyers, still offer flexible down payment requirements between 5% and 20%. Such programs provide a method to bridge the gap between a required down payment and potential homeowner's available funds. The Federal Housing Administration (FHA) offers loan programs for first time home buyers including low down payments, around 3.5%, low closing costs, and easy credit qualifying.

At this time, the greatest impediment to homeownership is creditworthiness. According to the FHA, lenders consider a person's debt-to-income ratio, cash available for down payment, and credit history when determining a maximum loan amount. Many financial institutions are willing to significantly decrease down payment requirements and increase loan amounts to persons with good credit ratings. Persons with poor credit ratings will likely be forced to accept a higher interest rate or a loan amount insufficient to purchase a house. Poor credit rating can be especially damaging to lower income residents who have fewer financial resources with which to qualify for a loan. The FHA is generally more flexible than conventional lenders in its qualifying guidelines and allows many residents to reestablish a good credit history.

In the goal of producing more affordable housing, all jurisdictions, developers, and potential homeowners/tenants in southern California face the same constraints of elevated construction costs and the financing limitations of lower credit scores. While cities and counties have little ability to directly address either constraint, the County will endeavor to support new construction options and coordinate on expanded financing tools as part of its housing programs.

3. Housing Constraints

3.2.3 ENVIRONMENTAL AND INFRASTRUCTURE CONSTRAINTS

The County of San Bernardino covers a territory larger than many states in the nation. As such, County residents will inevitably be subject to a wide variety of risks associated with natural hazards. These include geological hazards, flooding, and fire hazards. Some residential development is affected by the presence of biological resources, open space, cultural resources, paleontological resources, and mineral resources. This may affect the location of development or type of conditions imposed upon certain projects to mitigate environmental impacts. Between 2015 and 2020, the County conducted an exhaustive analysis of environmental and infrastructure constraints to identify areas of the unincorporated county that are suitable for future development at specific levels of intensity. This analysis included a review and mapping of the following hazards, resource areas, and infrastructure systems:

Environmental Hazards	Resource Areas	Infrastructure Systems
Earthquake fault zones	Biotic resources	Water service (wholesale/retail)
Liquefication and landslides	Open space/conservation	Groundwater basins
Dam and basin inundation	Agricultural resources	Wastewater treatment capacity
Flood zones	Mineral resources	Onsite wastewater restrictions
Fire hazard severity zones	Mineral resources	Natural gas
Fire responsibility areas		Electricity
Airport planning areas		Broadband Internet
Wind erosion hazards		

The County identified areas of the County where growth was optimal and supported by local communities, and where growth was constrained by one or more of the factors listed above. These factors can be found in policy maps associated with the following Policy Plan Elements: Infrastructure & Utilities, Natural Resources, Hazards, and Personal and Property Protection. Despite the magnitude and extent of these environmental and infrastructure limitations, and despite the federal government owning or controlling nearly 90% land in the county, sheer size of San Bernardino County (over 20,000 square miles) means that the amount of vacant and developable land is still larger than the amount of land within most large cities in southern California. Most of the land, however, would require substantial extensions of roads, sewer systems, and water systems to support any substantial amount of new housing.

For single family housing projects that can use water wells and septic systems, the average fee burden represents 7% to 9% of building valuation, which is comparable to the cost ratio of a multiple family project (see Table 3-6). In the Valley region and some areas in the Mountain and Desert regions, future housing projects will need to connect to water and sewer systems. In many parts of the East and North

Desert regions, however, there is an abundance of land that can support single family housing at the same cost efficiency as multiple family housing project that has access to existing water and sewer systems.

The cost of establishing new water and sewer systems to build multiple family housing outside of the Valley region is generally cost prohibitive and would only be feasible in the case of a master planned community such as the Hacienda at Fairview Valley Specific Plan (east of the Town of Apple Valley, adopted in 2014), that plans for over 3,100 units in four villages that would be phased and establish a water system and four wastewater treatment plants. In areas without access to an existing sewer system, batch treatment plants are feasible for individual multiple family projects but drive up monthly rental rates above the monthly mortgage payments of a single family home developed on well and septic.

New residential development within the Valley region experiences few of the hazards or limitations listed above. The topography, fire hazard constraints, and onsite wastewater treatment restrictions for new residential development within the Mountain region limits the amount of new development capacity. New residential development in the North and East Desert regions are more likely to encounter restrictions to use due to proximity to areas owned or controlled exclusively for open space or as sensitive areas for biological resources. Still, there are thousands of acres that can support low density residential development with access to safe and reliable potable water (onsite wells) and plenty of land for primary and redundant onsite wastewater treatment facilities. Through the implementation of the remainder of the Policy Plan, the County directs growth to take place primarily in the Valley region while allowing for safe and supportable growth in the Mountain and Desert regions.

4. HOUSING OPPORTUNITIES

4.1 OVERVIEW OF THE REGIONAL HOUSING NEEDS ASSESSMENT

State law requires that each city and county develop programs and apply zoning to meet its "fair share" of housing needs for not only its current population, but also for those who might reside within the jurisdiction in the future. Estimates of housing need are based on anticipated population growth, migration, household formation rates, employment forecasts, healthy vacancy rates, pent-up existing demand, and other factors. Based on statewide projections, the Department of Housing and Community Development allocates a regional housing need to subregions such as the six-county subregion of Southern California. The Southern California Association of Governments (SCAG) is the agency responsible for assigning this regional housing needs assessment (RHNA) allocation to each individual jurisdiction.

A local jurisdiction's RHNA allocation is divided into four income categories: very low, low, moderate, and above moderate, defined as households earning up to 50%, 80%, 120%, and more than 120% of the county median income, respectively. While jurisdictions are not required to construct the units, each jurisdiction must facilitate their development by the private, public/private, and not-for-profit sectors.

4.1.1 COUNTY RHNA ALLOCATION FOR 2021-2029

The RHNA allocation for the unincorporated county is 8,832 housing units for the 2021-2029 planning period. Table 4-1 shows how these units are distributed amongst the four income categories. The balance of this section presents ~~four~~ types of housing opportunities that could be realized during the planning period in the unincorporated county areas: housing that is already planned and entitled (but not yet constructed), trends and projections for accessory dwelling units (ADUs) and individual/small rural housing developments, and vacant land free from constraints and with suitable zoning. ~~Jurisdictions~~ While jurisdictions can also consider underutilized land that is free from constraints, has suitable zoning, and has the potential to be redeveloped into housing, ~~. While~~ the County is able to accommodate its RHNA without tapping into underutilized sites~~, five suitable underutilized sites are included to provide surplus capacity~~.

Table 4-1 2021-2029 RHNA Allocation for the Unincorporated County

Income Category	Allocation	Percent of Total
Very Low	2,179	24.7%
Low	1,360	15.4%
Moderate	1,523	17.2%
Above Moderate	3,770	42.7%
TOTAL	8,832	100%

Source: SCAG 6th Cycle Final RHNA Allocation Plan, 2021

4.2 PLANNED AND ENTITLED RESIDENTIAL DEVELOPMENT

Residential projects that are already approved but not yet constructed (aka pipeline development) represent the most likely housing development to be built during the planning period. This includes conventional development, approved specific plans, ADUs, and manufactured homes. Table 4-2 breaks down the planned and entitled residential development by region, type, and affordability level. The table is followed by a discussion of each type of residential development.

~~Table 4-2 Planned and Entitled Units by Region by Income Category~~

~~Geography & Unit Type~~	~~Very Low Income~~	~~Low Income~~	~~Moderate Income~~	~~Above Moderate Income~~	~~Total~~
~~**Single Family**~~	~~0~~	~~3~~	~~32~~	~~123~~	~~158~~
~~**Multifamily**~~	~~30~~	~~80~~	~~2~~	~~642~~	~~754~~
~~**Valley Corridor SP**~~	~~0~~	~~0~~	~~138~~	~~232~~	~~370~~
~~ADUs~~	~~10~~	~~46~~	~~35~~	~~1~~	~~92~~
~~Manufactured Homes~~	~~0~~	~~0~~	~~6~~	~~1~~	~~7~~
~~VALLEY~~	~~40~~	~~129~~	~~213~~	~~999~~	~~1,381~~
~~**Single Family**~~	~~6~~	~~15~~	~~60~~	~~140~~	~~221~~
~~**Multifamily**~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~
~~**ADUs**~~	~~7~~	~~8~~	~~14~~	~~2~~	~~31~~
~~**Manufactured Homes**~~	~~2~~	~~3~~	~~7~~	~~5~~	~~17~~
~~MOUNTAIN~~	~~15~~	~~26~~	~~81~~	~~147~~	~~269~~
~~**Single Family**~~	~~5~~	~~10~~	~~74~~	~~250~~	~~339~~
~~**Multifamily**~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~
~~**Hacienda at Fairview SP**~~	~~0~~	~~100~~	~~860~~	~~205~~	~~1,165~~
~~ADUs~~	~~10~~	~~31~~	~~4~~	~~0~~	~~45~~
~~Manufactured Homes~~	~~3~~	~~15~~	~~50~~	~~5~~	~~73~~
~~NORTH DESERT~~	~~18~~	~~156~~	~~988~~	~~460~~	~~1,622~~
~~Single Family~~	~~50~~	~~86~~	~~112~~	~~65~~	~~313~~
~~Multifamily~~	~~0~~	~~9~~	~~0~~	~~0~~	~~9~~
~~ADUs~~	~~18~~	~~32~~	~~3~~	~~0~~	~~53~~
~~Manufactured Homes~~	~~5~~	~~13~~	~~1~~	~~0~~	~~19~~
~~**EAST DESERT**~~	~~73~~	~~140~~	~~116~~	~~65~~	~~394~~
~~**Single Family**~~	~~61~~	~~114~~	~~278~~	~~578~~	~~1,031~~
~~**Multifamily**~~	~~30~~	~~89~~	~~2~~	~~642~~	~~763~~
~~Specific Plans~~	~~0~~	~~100~~	~~998~~	~~437~~	~~1,535~~
~~ADUs~~	~~45~~	~~117~~	~~56~~	~~3~~	~~221~~
~~Manufactured Homes~~	~~10~~	~~31~~	~~64~~	~~11~~	~~116~~
~~UNINC. TOTAL~~	~~146~~	~~451~~	~~1,398~~	~~1,671~~	~~3,666~~
~~**RHNA Allocation**~~	~~2,179~~	~~1,360~~	~~1,523~~	~~3,770~~	~~8,832~~
~~**RHNA Balance**~~	~~2,033~~	~~909~~	~~125~~	~~2,099~~	~~5,166~~ [1]

~~Note: 1. Total reflects the sum of the remaining RHNA allocation (not the total RHNA allocation minus total approved/entitled development).~~

Table 4-2 Planned and Entitled Units by Region by Income Category

Geography & Unit Type	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
Single Family	0	0	18	50	68
Multifamily	39	80	48	642	809
Valley Corridor SP	0	0	138	232	370
ADUs	0	17	7	0	24
Manufactured Homes	0	0	2	0	2
VALLEY	**39**	**97**	**213**	**924**	**1,273**
Single Family	0	0	23	55	78
Multifamily	0	0	0	0	0
ADUs	0	0	0	0	0
Manufactured Homes	0	0	10	0	10
MOUNTAIN	**0**	**0**	**33**	**55**	**88**
Single Family	4	5	18	174	201
Multifamily	0	0	0	0	0
Hacienda at Fairview SP	0	100	860	205	1,165
ADUs	2	12	3	0	17
Manufactured Homes	0	49	0	0	49
NORTH DESERT	**6**	**166**	**881**	**379**	**1,432**
Single Family	35	40	68	24	167
Multifamily	0	0	0	0	0
ADUs	2	13	1	0	16
Manufactured Homes	0	8	0	0	8
EAST DESERT	**37**	**61**	**69**	**24**	**191**
Single Family	39	45	127	303	514
Multifamily	39	80	48	642	809
Specific Plans	0	100	998	437	1,535
ADUs	4	42	11	0	57
Manufactured Homes	0	57	12	0	69
UNINC. TOTAL	**82**	**324**	**1,196**	**1,382**	**2,984**
RHNA Allocation	**2,179**	**1,360**	**1,523**	**3,770**	**8,832**
RHNA Balance	**2,097**	**1,036**	**327**	**2,388**	**5,848**

Figures include units that: 1) received certificates of occupancy (CoO) on or after the start of the RHNA projection period (6/30/21), 2) received building permits in 2021 but not a CoO, and 3) have been entitled through specific plans. Install/infrastructure/other costs added to manufactured and rural single family homes. Figures exclude ADUs and single family/manufactured homes that have, applied for, or are expected to apply for short-term rental permits.
Sources: 2021 Annual Progress Report, County of San Bernardino; Valley Corridor Specific Plan; and Hacienda at Fairview Specific Plan.

Conventional Single Family and Multifamily

Conventional residential development includes site-built (aka stick-built) single family and multifamily developments built by private developers, single family homes built by individuals in the more urbanized areas, and single family homes built as rural housing on well and septic systems. Presently, ~~1,031~~514

single family units (112 on piped water and sewer) and ~~763~~ 809 multifamily units are at varying stages in the development process with completion and occupancy anticipated during the planning period.

Within the Valley region, ~~the majority of~~most new development is multifamily, which is expected as the land prices require, and infrastructure systems allow for higher density housing ~~projects~~. A ~~handful~~ number of single family homes are being built by small developers and individuals at a value that is affordable to ~~lower~~ moderate or above moderate income households ~~(~~based on a review of recent sales prices and total assessed value (for units built by individuals~~land value plus building permit valuation~~). The last nine units of Bloomington Grove III (building B5) are completed and were occupied in 2022. These units are income-restricted for very low income households. The Las Terrazas Apartments is ~~currently~~ under construction in the Colton sphere of influence (SOI) and consists of 110 affordable and two manager units, a community building, and a childcare building, with all buildings constructed on a six-acre site. Thirty units will be designated for the homeless living with a mental disability at or below 20% AMI, with the balance set aside for households earning at or below 80% AMI, along with two manager units to be rented at rates affordable to moderate income households.

In the unincorporated SOI of the cities of Fontana and San Bernardino, 46 condominium units received building permits and/or certificates of occupancy for three projects (14 to 16 units per project at a density of 12 to 14 units per acre), with prices expected to be affordable to moderate income households. Additionally, 642 units of market rate multifamily development were recently approved in the unincorporated island surrounded by the City of Redlands, approved through the County's East Valley Area Plan. The Standard (282 units on 9.54 acres, 29.6 units per acre), and CR The Redlands (360 units, 8.58 acres, 42 units per acre) are both expected to be constructed and occupied by 2024.

In the Mountain region, only single family homes are in the pipeline, with 23~~1~~ being built at a value that is affordable to ~~lower~~ moderate income households ~~and 60 at a value that is affordable to moderate income households~~ (based on land value plus building permit valuation). The balance is expected to be affordable to above moderate income households.

In the North and East Desert regions, single family homes are also the dominant development type due to the abundance of developable and low-cost land and the lack of piped water and sewer systems. The East Desert appears to be more affordable than the North Desert, however, both are comparable with the other when looking at rural housing development (single family homes built on well and septic systems). Housing projects in the pipeline in the North Desert also include some in master planned communities that cost more due to the inclusion of local onsite common amenities such as formalized open space and more advanced water and wastewater systems. The housing built by individuals on well and septic in either desert region is often affordable to lower incomes based largely on the extremely low cost of land. For example, the average land cost was $10,251 per lot for new rural single family homes that were considered affordable to very low income households and received building permits and/or certificates of occupancy in 2021. Additionally, these units tend to be very small studio or one-bedroom structures that can be as small as 391 to 448 total square feet (excluding carports). The County determined the affordability category using the land cost, building permit valuation (equivalent to Assessor improvement value for site built homes), and the same costs as for manufactured homes

excluding delivery costs (see Table 4-3). ~~and ability to build with available groundwater wells and onsite septic systems (50% or more affordable to lower income households based on land value plus building permit valuation).~~

Specific Plans

The County administers a number of specific plans throughout its various regions. The majority of these specific plans have been fully developed or annexed into incorporated cities, but two are anticipated to see development activity~~buildout~~ during the 2021-2029 planning period.

Hacienda at Fairview Valley

Hacienda at Fairview Valley is a 1,557-acre residential master planned community located in Apple Valley's eastern SOI. At completion, the community will include a variety of age-restricted and non-age-restricted residential product types nestled in the foothills of the Granite Mountain Range. The community is ultimately expected to support 3,114 units throughout four planning areas or villages. A total of 299 units are planned for lots greater than one-half acre and could treat wastewater through onsite septic systems, but the remaining 2,815 units are planned for smaller lots that will require a wastewater collection system. Each village will have its own wastewater treatment system, with a package treatment system serving the first 250 units while a larger permanent treatment system is constructed for the balance of each village. The specific plan area will be served by the Apple Valley Ranchos Water Company, which has a 24-inch mainline less than one mile to the west. Once the mainline is extended, a total of three water tanks/reservoirs are planned, although initial development may also take advantage of available water from onsite wells to expedite construction. Each village will also provide a roadway system that either interconnects with a neighboring village and functions independently via Cahuilla Road, allowing development to occur within each village concurrently.

Although the development obtained approval in 2014, some project delays and the pandemic stalled activity. The project has recommenced activity, including recent property transactions in 2020 and the County expects approximately one-third (1,165) of the total (3,114) units to be built during the planning period. This could occur through the full buildout of Village A or the partial buildout of more than one village. The residential land use categories within the specific plan allow for development on lots as large as 2+ acres (0.5 units per acre) and as small as 4,000 square feet (11 units per acre). The majority of residential development (89%) is planned to occur on lots between 4,000 and 7,000 square feet (5 to 11 units pe acre). The highest density category includes small-lot single family detached and single family attached/townhome products (up to 133 in Village A and up to 305 in Village C).

The County assumes that 100 will be affordable to lower income households (townhomes), 860 will be affordable to moderate income households, and 205 will be affordable to above moderate income households. While this development is a master planned community, the land values remain extremely low (land sold for less than $1,000/acre in 2003 and still even in 2020 (the latest sale)). Additionally, market rates (as of November 2021) of similar new construction single family detached products are currently selling for $318,790 to $356,900 in Victorville (Sky Haven III community) and $340,000 to $355,000 in Apple Valley (Desert Knolls Estates), and similar single family attached/townhome products

are selling for $129,990 to $239,000 in Victorville (Marina View Townhomes). All of these prices are for homes within an incorporated town/city where land and sales prices are higher compared to unincorporated areas. The sales prices for all homes are below the maximum affordable purchase price for moderate income households and the townhome sales prices are below the maximum affordable purchase price for low income households.

Valley Corridor Specific Plan

The Valley Corridor Specific Plan was initiated in 2014 and adopted in 2017 and builds upon recent investment in the unincorporated community of Bloomington. The 355-acre area is envisioned as a vibrant corridor that provides community members a diverse selection of housing, recreation, and employment opportunities. At full buildout, the area will provide up to 1,093 residential units. In 2016, the Housing Authority of the County of San Bernardino partnered with Related California to construct Bloomington Grove (288 affordable units over three phases, plus a new branch County library) within the Mixed-Use district of the specific plan. This development also brought in a sewer trunk extension and confirmed water service/supply to facilitate more development within the corridor. The remaining capacity entitled by the specific plan is 805 units that could take place on the remaining parcels designated for Mixed-Use (116 remaining units, up to 40 units per acre), Medium/High (435 units, up to 24 units per acre), and Low/Medium (235 units, up to 10 units per acre). The majority of land designated for residential or mixed-use development is currently either vacant or occupied by truck storage with little to no improvements.

The County estimates approximately 370 units would be developed during the 2021-2029 planning period and will contribute to the County's moderate and above moderate housing inventory. A review of sales prices of recently constructed single family detached and attached homes in the cities of Chino, Fontana, and Rancho Cucamonga indicate that master planned communities with densities up to 25 dwelling units per acre offer homes that are affordable to moderate income households. Accordingly, the County assumed 138 units could be affordable to moderate income households and 232 units could be affordable to above moderate income households.

Accessory Dwelling Units

~~Accessory dwelling units (ADUs) have grown increasingly popular over the past five years, with 221 ADUs in the development pipeline from the past 2½ years in communities throughout the unincorporated county (see Table 4-2). The affordability breakdown is based on SCAG's 2020 ADU survey and affordability assumptions for San Bernardino County (57.5% lower, 34.8% moderate, and 7.7% above moderate). The County permitted 57 ADUs in 2019, 94 ADUs in 2020, and 68 during the first six months of 2021—all without any significant promotion or incentives, during a pandemic in 2020 and 2021, and with applications submitted largely prior to the most recent ADU legislation and approved prior to the start of the planning period.~~ A total of 57 ADUs received building permits or certificates of occupancy in 2021 (excluding those intended for use as short-term rentals). As the County does not yet collect estimated rental cost in applications for ADUs, affordability levels shown in Table 4-2 were based upon the best available data, which is currently the median rent levels associated with the census block group. Of the 57 ADUs, two are in census block groups where the median monthly rent

is at or below $672, 19 are in census block groups where the median monthly rent is at or below $988, 25 are in census block groups where the median monthly rent is at or below $1,260, and the balance (11) are in census block groups where the median monthly rent is between $1,318 and $1,697. While the County does not yet request household size information on ADUs, the County assumed a mix of one- and two-person households. In 2021, the maximum affordable rent would be $691 (one-person) and $790 (two-person) for very low income household and $1,106 (one-person) and $1,265 (two-person) for low income households, based on state income limits (see Table 2-17). A review of the surveyed rent levels in Appendix A of the SCAG's 2020 ADU Affordability Analysis indicated that eight of 10 jurisdictions/communities that were either in San Bernardino County or similar to unincorporated San Bernardino County reported monthly rents at or below $1,200, with five of the eight charging rents that were at or below $1,000.

Based on this information, the County assumes that of the 57 ADUs that received building permits or certificates of occupancy in 2021, 4 were affordable to very low income households, 42 were affordable to low income households, and 11 were affordable to moderate income households. A number of the ADUs assumed to be affordable to very low and low income households may be rent free and affordable to extremely low income households. SCAG's 2020 ADU Affordability Analysis cited research from elsewhere in California that would indicate 15% of ADUs may be intended for occupancy by individuals (e.g., aging parents or adult children) without the expectation of paying rent. This assumption, if applied, would mean up to 9 of the 57 ADUs in 2021 could be affordable to extremely low income households (though this assumption is not applied in Table 4-2).

Manufactured Homes

Manufactured homes offer residents an ability to buy a single family detached home at prices that are often 15% to 20% lower compared to site-built homes. This cost savings facilitates homeownership for lower income households in the Mountain and ~~desert regions~~Desert regions where land prices are lower compared to the Valley region. The County currently has ~~116~~ 69 manufactured homes in the development pipeline that have approved building permits or certificates of ~~with~~ occupancy from 2021 ~~anticipated in the next 1 to 2 years~~ (see Table 4-2). The County determined that 57 units would be affordable to lower income households and 12 would be affordable to moderate income households based on the combined costs associated with the land, manufactured unit, and associated delivery, installation, entitlements/fees, and utilities. Tables 4-3 and 4-4 break down the cost factors associated with building manufactured homes on sites served by well and septic systems (note that all costs excluding construction and delivery also apply to rural single family homes built on sites served by well and septic systems).

Table 4-3 Average Costs to Develop Manufactured Homes (excluding land costs)

Cost Factors	500 sq ft 1 bd / 1 ba	1,000 sq ft 2 bd / 2 ba	1,500 sq ft 3 bd / 2 ba	2,000 sq ft 4 bd / 2 ba
Construction of Unit [1]	$83,700	$125,900	$156,300	$211,600
Unit Transportation / Delivery [2]	$3,000	$4,000	$5,000	$6,000
County Planning / Building Fees	$2,000	$2,200	$2,500	$3,000

Table 4-3 Average Costs to Develop Manufactured Homes (excluding land costs)

Regional Traffic / School Fees	$8,500	$8,500	$8,500	$8,500
Well / Septic System Installation	$7,500	$8,500	$9,500	$10,000
Electricity Connection / Extension	$4,000	$4,000	$4,000	$4,000
Propane Tank Installation (Underground)	$2,500	$3,500	$4,500	$5,500
Foundation Construction / Installation	$15,000	$15,000	$15,000	$15,000
Total Capacity	**$126,700**	**$171,600**	**$205,300**	**$263,600**

Notes:
1. Average cost of a new manufactured home based on quotes in April 2022 dealerships that serve San Bernardino County: Wholesale Manufactured Homes, Pacific Manufactured Homes, and Paramount Manufactured Sales.
2. Reflects an average of delivery fees before and during the surge in diesel prices in early 2022, with fuel prices expected to return to typical later in 2022.

Table 4-4 Average Total Costs to Develop Manufactured Homes in 2021

Characteristics / Costs [1]	500-999 sq ft	1,000-1,499 sq ft	1,500-1,999 sq ft	2,000+ sq ft
Number of Units	11	31	23	4
Average Size (sq ft)	826	1,292	1,767	2,274
Average Unit Cost	$111,381	$141,286	$186,000	$237,400
Average Land Cost	$21,543	$31,803	$38,888	$27,483
Average of Other Costs	$42,500	$45,700	$49,000	$52,000
Average Total Cost	**$175,424**	**$218,789**	**$273,388**	**$316,883**
Max Affordable Price for a Low Income Household [2]	**$205,000 (2-person)**	**$230,000 (3-person)**	**$270,000 (4-person)**	**$270,000 (4-person)**

Notes:
1. Based on manufactured homes that were issued building permits and/or certificates of occupancy in 2021.
2. Based on HCD Income Limits, December 2021.

While manufactured homes can also be affordable to very low income households, no units were issued building permits or certificates of occupancy in 2021 that would qualify. This is due in part to a slight difference between lending practices for site-built and manufactured homes. Very small site-built homes (under 500 square feet) can more easily qualify for conventional construction and mortgage financing, whereas manufactured homes need to be double wide (typically over 500 square feet) to access lower cost financing options. Single wide manufactured homes may require specific financing programs that are not offered by all lenders. Accordingly, the smallest manufactured homes tend to be double that of the smallest site-built homes. Additionally, as previously stated, manufactured homes cost less per square foot to build, which allows lower income households to obtain a larger home that contains either more bedrooms, bathrooms, or general living space. ~~Using HCD's affordability calculator as informed by land and building permit values~~

~~, the County estimates that 41 units would be affordable to lower income households, 64 would be affordable to moderate income households, and the remaining 11 would be affordable to above moderate income households.~~

4.3 TRENDS AND CAPACITY OF RURAL HOUSING, ADUs, AND MANUFACTURED HOMES, AND RURAL HOUSING

The County anticipates the continued construction of accessory dwelling units, manufactured homes, and single family dwellings in rural settings, consistent with new construction trends from the past few three or four years. Table 4-3The following presents the estimated projection of new units to be permitted or constructed during the planning period (excluding any housing already in the pipeline).

Table 4-3 Development Trends for ADUs, Manufactured Homes, and Rural Single Family Homes

Unit Type	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Balance [1]	2,942	125	2,099	5,166
Rural Single Family Homes	260	355	894	1,513
Accessory Dwelling Units	295	179	39	513
Manufactured Homes	104	149	17	270
Total Capacity	**659**	**683**	**954**	**2,296**
Remaining RHNA Balance	2,283	-	1,145	3,428 [2]

Notes:
1. RHNA balance after pipeline development (see Table 4-2)
2. Total reflects the sum of the remaining RHNA balance.

4.3.1 RURAL SINGLE FAMILY DEVELOPMENT TRENDS AND CAPACITY

The County anticipates the continued construction of detached single family units in rural areas during the planning period. Pending rural single family housing (housing built away from urbanized areas serviced by onsite water wells and septic systems), is distributed throughout the unincorporated county, with 3339% in the North Desert region, 3132% in the East Desert region, 2115% in the Mountain region, and 1513% in the Valley region. While much of the Valley region is heavily urbanized, the unincorporated areas (particularly in the central and eastern portions of the Valley region), still contain a large number of parcels that are large enough to accommodate onsite septic systems. In the future, however, the County does not anticipate the same distribution as the Valley region will likely continue to be urbanized and sewer systems are likely to be extended through more suburban-type housing development, which will result in more parcels being subject to sewer connection requirements.

In the Desert regions,New rural single family homes in the East Desert tends to be more affordable (4345% affordable to lower income households) compared to the other regions, where new housing is generally affordable only to moderate or above moderate income households.North Desert (4% affordable to lower income households) based on currently approved single family homes (outside of specific plans). Rural single family homes built in the Mountain region demonstrate a 10% affordability rate for lower income households while the Valley region is much less affordable, with only 2% of new rural single family homes being affordable to lower income households. The County does not anticipate substantial growth in the East Desert, though there remains an abundance of land and opportunities to develop lower cost housing. While the County will still obtain credit toward its RHNA allocation for

rural housing built in any region based on its sales prices or total assessed value, the County will limit its projections assuming new rural single family homes are affordable to moderate and above moderate income households.

The maximum affordable purchase price for a moderate income household is $328,000 for a two-person household and $423,000 for a four-person household. Assuming land values associated with single family homes built in the unincorporated county between 2018 and 2021 (see Table 2-19), the majority of rural single family homes are on ½-acre or 1-acre lots that cost an average of $73,000, though land can easily be found for $20,000 or lower. This low land costs enables a moderate income household to spend between up to $255,000 for a two-person household or up to $350,000 for a four-person household to entitle, construct, and finish a site-built home while remaining within the maximum affordable purchase price. This is consistent with the costs to build new single family homes in incorporated communities such as Appley Valley, Adelanto, Victorville, and Yucca Valley.

Over the past four years, the County has seen steady growth of rural single family homes, particularly at prices affordable to moderate and above moderate income households. For such units affordable to moderate income households, the construction figures were 31 in 2018, 33 in 2019, 57 in 2020, and 74 in 2021. This trend surpasses the annual average that is needed (43 per year) for the County to accommodate its remaining RHNA allocation of 327 moderate income units. As shown in Table 4-5, the projections for rural single family homes affordable to moderate income households are based on the number observed in 2021 (74), assuming such units receive building permits and/or certificates of occupancy between January 1, 2022 and October 15, 2028, allowing for an additional year for the units to be constructed and occupied within the planning period (ending October 15, 2029).

For such units affordable to above moderate income households, the construction figures were 73 in 2018, 104 in 2019, 132 in 2020, and 167 in 2021. While the four-year trend may indicate that the number could be expected to continue increasing, the County projects future capacity assuming an annualized rate equal to those seen in 2021 (167 per year) for the balance of the planning period. This assumption would generate an additional 1,106 rural single family homes per year that would be affordable to above moderate income households.

Table 4-5 illustrates these projections of future building permits between January 1, 2022 and October 15, 2028, allowing for an additional year for the units to be constructed and occupied within the planning period (ending October 15, 2029).

In addition, the County contains multiple thousands of additional vacant parcels with residential zoning (RL and RS allowing up to two units per acre) across the North Desert and East Desert regions that can support the installation of well and septic systems and are free of any environmental, infrastructure, or other constraints. These sites could easily support the County's RHNA balance for above moderate income households. Per California Government Code Section 65583.2(b)(6), such sites are not required to be identified by parcel and their capacity is represented in aggregate in Table 4-5.

~~Based on an annual average of roughly 413 rural single family homes per year, the County could expect to approve 3,423 units during 8.3-year planning period (figures rounded). However, to be conservative and account for those rural single family homes to be constructed and occupied during the planning period, the County only assumes that rural single family homes already in the development pipeline would be constructed and occupied (see Table 4-2), plus up to 2,392 rural single family homes projected to be approved between July 1, 2021 and October 15, 2027. Two additional reduction factors are added to reduce the projection of rural single homes. One reduction factor is an expectation for ADUs and manufactured homes to become increasingly popular as alternatives to site-built rural single family homes. The second reduction factor is an expectation for rural single family housing to become less common in the Mountain and Valley regions. To account for these two factors, the County is reducing its projections of rural single family homes by roughly one third (37%) from 2,392 to 1,513 rural single family homes. These units are projected to be approved between July 1, 2021 and October 15, 2027 (see Table 4-3), allowing for an additional two years for the units to be constructed and occupied within the planning period. This reduction of 879 units is actually more than the projected combined number of ADUs and manufactured homes shown in Table 4-3, reinforcing the conservative nature of the County's projections.~~

Table 4-5 Development Projections for Rural Single Family Homes

Unit Type	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Balance [1]	3,133	327	2,388	5,848
Projected Rural Single Family Homes	-	490	1,106	1,596
Capacity on Unconstrained Residential Land [2]	-	-	1,282	1,282
Remaining RHNA Balance	3,133	-	-	3,133

Notes:
1. RHNA balance after pipeline development (see Tables 4-2).
2. While the County's capacity for rural single family homes affordable to above moderate income households is substantially larger; figures were limited to the remaining RHNA balance.

~~The affordability breakdown is based on the affordability levels seen in the land and permit valuation data of rural single family homes in the development pipeline: 17% lower income, 27% moderate income, and 56% above moderate income. Due to the surplus of projected moderate income units, the County has transferred some projection (about 50 units) of moderate income affordability to the above moderate income category.~~

4.3.2 ACCESSORY DWELLING UNIT TRENDS

Accessory dwelling units (ADUs) have grown increasingly popular over the past four years throughout the unincorporated county, growing from a total of 3 in 2018 to 23 in 2019, 33 in 2020, and 57 in 2021. This trend took place without any promotion or incentives and during a pandemic in 2020 and 2021.

These figures include only those units that have received building permits or certificates of occupancy and exclude units used for short-term rentals (currently allowed in the Mountain and Desert regions). Of the 57 ADUs in 2021, a little less than half (24) are in the Valley region and the balance are evenly distributed into the North and East Desert regions. To reinforce conservative estimates, all 16 ADUs

that were issued building permits and/or certificates of occupancy in 2021 in the Mountain region were assumed to be intended for use as seasonal cabins, vacation homes, or short-term rentals based on the region's historical prevalence of low, seasonal occupancy patterns. Of the ADUs in the Desert regions, approximately 16% have active short-term rental permit applications or permits (ADUs are not permitted to be used for short-terms rentals in the Valley region).

While the four-year trend demonstrates that the number of ADUs may increase each year, the County projects future capacity assuming an annualized rate equal to those seen in 2021 for the balance of the planning period. ~~Between 2019 and the first half of 2021, the County approved 221 ADU's, with the majority affordable to very low and low income households based on the findings of SCAG's 2020 ADU study. Pending ADU development is distributed throughout the County with the highest proportion in the Valley region (42%). The East Desert region constitutes 24%, followed closely by the North Desert at 20%, and the Mountain region at 14%.~~

Based on an annual average of roughly ~~88~~ 57 units per year, the County could expect to approve building permits for ~~734 ADUs during 8.3-year planning period (figures rounded). However, to be conservative and account for those ADUs to be constructed and occupied during the planning period, the County only assumes that ADUs already in the development pipeline would be constructed and occupied (see Table 4-2), plus 513 ADUs projected to be approved~~ 377 ADUs between ~~July~~ January 1, 2022~~1~~ and October 15, ~~2027~~ 2028~~(see Table 4-3)~~, allowing for an additional ~~two~~ year~~s~~ for the units to be constructed and occupied within the planning period (ending October 15, 2029). In the past three years, the County determined (based on local rent levels), that between 78% and 100% of ADUs were affordable to lower income households. To reinforce conservative assumptions, the County will forecast ~~The~~ the affordability of future ADUs ~~breakdown is again~~ based on SCAG's 2020 ADU survey and affordability assumptions for San Bernardino County (57.5% lower, 34.8% moderate, and 7.7% above moderate).

After combining projected ADUs with those that are already ~~approved~~in the pipeline, the County anticipates that a total of ~~457~~ 263 lower income ADUs would be constructed and occupied during the planning period. This represents a ~~relatively~~ small percentage (~~13~~7%) of the County's lower income RHNA allocation of 3,539 units. The remaining ~~87~~93% is being addressed by single family (including manufactured) and multifamily homes that are either already approved (see Table 4-2), ~~or~~ projected manufactured homes based on past trends (see Table 4-7~~3~~), ~~or~~ and~~through~~ development capacity on vacant land that is suitably zoned and free from development constraints (see Table 4-8 and Appendix A).

As previously stated, current ADU activity occurred without the County engaging in strong promotional activities or incentives beyond complying with state laws. During public outreach events involving long-term housing and planning activities, a frequent comment and request was to find ways to reduce obstacles (like costs of subdividing land) to building additional units (particularly for family members) on sites containing existing homes. Recent ADU laws clear previous obstacles by allowing for at least one ADU and potentially one junior ADU on an existing site by right. Program 3 of the Housing Strategy describes additional incentives, activities, and monitoring the County will explore and conduct to facilitate ADU construction consistent with and beyond the projections described above. This

includes the creation of additional marketing materials, identifying and promoting pre-approved ADU site plans that would be appropriate for various unincorporated communities, and reducing or waiving fees for ADUs proposed in high/highest resource areas (per TCAC mapping) when the ADUs are reserved for lower income households.

Program 3 also details monitoring activities and steps to be taken if actual ADU permitting activity falls below projected levels. Ultimately, if ADU permitting activity falls 25% or more below projected levels by June 30, 2023, the County will revise projections to match actual activity. If this revision would cause the County to be unable to accommodate 100% of its RHNA allocation, the County will identify additional suitable sites to account for the shortfall.

Table 4-6 Projections for Accessory Dwelling Units

Unit Type	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Balance [1]	3,133	-	-	3,133
Accessory Dwelling Units [2]	217	-	-	217
Remaining RHNA Balance	2,916		-	2,916

Notes:
1. RHNA balance after pipeline development and rural single family homes (see Tables 4-2 and 4-5)
2. While trends indicate that a percentage of ADUs can and will likely provide units at prices/rents affordable to moderate income households, the County limited its projections to the remaining RHNA balance.

4.3.3 MANUFACTURED HOUSING TRENDS

The County of San Bernardino has had significant success incorporating manufactured homes into the community fabric, particularly in the ~~desert regions~~Desert regions. Approximately 80% of pending manufactured home development is concentrated in either the North Desert region (~~63~~71%) or the East Desert region (~~16~~12%). The balance will take place in the Mountain region (~~15~~14%) and Valley region (~~6~~3%). This is to be expected as the low cost of manufactured homes matches well with the ~~desert regions~~Desert regions' extremely low land costs, availability of water wells, and large lots that can accommodate onsite septic systems. Additionally, many of the manufactured homes are constructed in the ~~desert regions~~Desert regions of San Bernardino and Riverside County, which reduces the cost of transporting and delivering a manufactured home.

Throughout the unincorporated county (see Table 4-2), approximately ~~35~~83% of pending development is affordable to lower income households and the balance ~~, 56%~~ is affordable to moderate income households~~, and the remaining 9% is affordable to above moderate income households~~. ~~Pending manufactured homes in the East Desert region are almost exclusively affordable to lower income households (95%) while affordability for lower income households in the North Desert and Mountain regions is 25% and 29%, respectively.~~ Manufactured housing has not proven as popular or affordable in the Valley region.

The permitting and construction data suggests a trend of stability and some potential growth for manufactured homes, with 54 issued building permits or certificates of occupancy in 2019, 53 in 2020,

and 69 in 2021. The distribution of affordability has shifted substantially indicating manufactured homes are an increasingly popular option for affordable housing with the proportion of units accessible to lower income households increasing from 20% in 2019 and 2020 to over 80% in 2021. Trends in the homebuilding and rental markets indicate that the increasing scarcity of starter homes exacerbated by the surge in monthly rents for existing and new apartments is driving buyers to seek out low cost land in the Desert regions where they can not only obtain a lower and affordable cost of housing, but one of home ownership that enables them to build equity and generational wealth.[12] Additionally, manufactured home production recently hit a 15-year high, with manufacturers delivering over 105,000 units nationwide in 2021, reflecting an average increase of 7% per year from the previous peak and after the Great Recession.[3] According to the Manufactured Housing Institute, with eight operating facilities, California has the fourth largest number of manufactured home plants in the nation, with many of these facilities and associated distribution centers located in Orange, Riverside, and San Bernardino counties. With this information, the County believes that 2021 represents an appropriate representation for the remaining years in the planning period for projection purposes.

There are a number of current financing resources that can facilitate the creation and occupancy of manufactured housing in rural areas for lower income households. The USDA Section 502 Direct Loan and CalHFA USDA programs assist low- and very-low-income applicants obtain decent, safe, and sanitary housing in eligible rural areas by providing payment assistance to increase an applicant's repayment ability. The County confirmed that all unincorporated areas that are not fully surrounded by incorporated boundaries (i.e., unincorporated islands) in the Mountain and Desert regions qualify as USDA eligible rural areas. Unincorporated residents can also obtain federally-insured loans for manufactured homes through the CalHFA and CalPLUS FHA programs and, for veterans, the CalHFA VA Program. Down payment assistance can be obtained through the state's MyHome Assistance Program. The County will, through Program 11 in the Housing Strategy, promote the use of manufactured housing for lower income households in rural areas by increasing awareness of these programs and coordinate with developers, individual manufacturers, and the California Manufactured Housing Institute to explore other methods of assistance and to develop informational brochures and/or website content to be used as an outreach and educational tool.

Based on an annual average of roughly 69~~46~~ manufactured homes per year, the County could expect to approve building permits for 457 manufactured homes between January 1, 2022 and October 15, 2029. Due to the offsite construction and prefabricated nature of manufactured homes, the time between building permit and occupancy is much shorter (typically between two and four months) for manufactured homes compared to site built homes~~the County could expect to approve 385 units during~~

[1] Eisen, B., & Friedman, N. (2021, November 21). Home prices are surging. the manufactured-housing industry sees an opening. The Wall Street Journal. Retrieved February 25, 2022, from https://www.wsj.com/articles/home-prices-are-surging-the-manufactured-housing-industry-sees-an-opening-11637490602

[2] Borland, K. M. (2020, November 5). Manufactured home capital demand soars during the pandemic. GlobeSt. Retrieved March 1, 2022, from https://www.globest.com/2020/11/05/manufactured-home-capital-demand-soars-during-the-pandemic/?slreturn=20220311085233

[3] Institute for Building Technology & Safety via the US Census Bureau. (2021, October 8). U.S. manufactured housing shipments by state: 2020. Census.gov. Retrieved March 1, 2022, from https://www.census.gov/library/visualizations/2020/econ/2020-shipments-map.html [data provided for years 1994 through 2021 despite URL listing year reference as 2020]

~~8.3-year planning period (figures rounded). However, to be conservative and account for those manufactured homes to be constructed and occupied during the planning period, the County only assumes that manufactured homes already in the development pipeline would be constructed and occupied (see Table 4-2), plus 270 manufactured homes projected to be approved between July 1, 2021 and October 15, 2027 (see Table 4-3), allowing for an additional two years for the units to be constructed and occupied within the planning period~~. The County projects an affordability breakdown ~~is~~ for future units that is more conservative compared to what has been demonstrated in 2021, assuming 63% affordable to lower income households for projections compared to 83% for units receiving building permits or certificates of occupancy in 2021. This assumption is supported by cost factors documented from manufactured units that obtained a building permit or certificate of occupancy in 2021 (see Tables 4-3 and 4-4). ~~based on the affordability levels seen in the land and permit valuation data of manufactured homes in the development pipeline.~~

Accordingly, the County anticipates that a total of 334 manufactured homes (roughly 44 per year) would be constructed and occupied during the remaining part of the planning period and be affordable to lower income households (see Table 4-7), with the balance (37%) expected to be affordable to moderate income households. When combined with the 57 lower income manufactured units already in the pipeline, the 391 total represents a relatively small percentage (11%) of the County's lower income RHNA allocation of 3,539 units. ~~The East and North Desert regions are projected to experience the majority of future manufactured home development during the planning period. Approximately 40% of projected manufactured homes are anticipated to be affordable to lower income households, with the remaining units projected to be affordable to moderate (50 percent) and above moderate (10% percent) households.~~ The number of manufactured homes built during the planning period could be substantially larger as the North and East Desert regions contain ~~tens of~~multiple thousands of acres ~~of~~ and parcels that are extremely low cost, currently zoned for residential, and free from environmental or infrastructure constraints.

Table 4-7 Projections for Manufactured Homes

Unit Type	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Balance [1]	2,916		-	2,916
Manufactured Homes [2]	334	-	-	334
Remaining RHNA Balance	2,582		-	2,582

Notes:
1. RHNA balance after pipeline development and rural single family homes (see Tables 4-2 and 4-5)
2. While trends indicate that a percentage of manufactured homes can and will likely provide units at prices/rents affordable to moderate income households, the County limited its projections to the remaining RHNA balance.

4.4 VACANT LAND

4.4.1 DEVELOPMENT CRITERIA

With a vast amount of vacant land, the County applied specific criteria when selecting sites for its housing inventory to include only those with the best chance of developing during the planning period, while maintaining consistency with the policies elsewhere in the Countywide Plan (CWP), the projections evaluated in the CWP EIR, and approaches to affirmatively furthering fair housing (AFFH).

Vacancy Status

Any site included must be vacant, generally defined as undeveloped land but more precisely defined as land that is not already slated for future development and lacks any building improvements, unless they are clearly abandoned or so dilapidated as to be non-functional. Additionally, consistent with changes in state law, land used for agricultural purposes is no longer considered functionally vacant even with an absence of building improvements.

Environmental Hazards

Any site included must be free from environmental hazards that could make future housing development unsafe or increase development costs substantially. The intent is to identify housing opportunities that accommodate the RHNA allocation without increasing the number of future residents exposed to potential harm caused by environmental hazards and without increasing the potential strain on emergency services during a disaster or periodic times of extreme weather. Vacant sites were excluded if they contained or were exposed to hazards related to earthquakes, 100-/500-year flooding, dam/basin inundation, very high fire hazard severity zones, wind erosion, and airport safety zones.

Established Planning Areas

Any site included must be within an existing community planning area or unincorporated sphere of influence (SOI). Although development does occur outside of such areas, the amount of development is very small, and the County does not seek to encourage substantial growth outside of such areas.

EIR Assumptions

The CWP EIR evaluated a broad distribution of incremental growth throughout the entire unincorporated community. While the residential buildout evaluated in the CWP EIR is larger than the RHNA allocation, the development horizon was 2040, which is a little over 10 years beyond the 2021-2029 planning period for this Housing Element. The County preferred vacant sites whose development would best align with the CWP EIR projections, both in location, type, and number of residential units.

Exceptions were made for sites in the Valley region as additional development in this part of the unincorporated county is closer to transit, high quality job opportunities, retail stores, urban services, and urban amenities. As such, additional housing sites in the Valley region (beyond what was evaluated in the CWP EIR), would reduce vehicle miles traveled (and thus also reduce greenhouse gas emissions) and decrease the potential for biological impacts on the more sensitive Mountain and Desert regions.

AFFH/Resource Areas

The County applied the lens of AFFH when considering vacant sites, with a preference for sites in higher or highest resource areas. As stated previously, many of the areas designated as high or highest resource are actually undevelopable lands (steep slope, in a National Forest, and/or reserved exclusively for open space/habitat preservation) and are outside of or far from the spheres of influence (SOIs) of the incorporated cities and towns. The County first focused on identifying vacant sites for lower income housing in high or higher resource areas that offered suitable zoning and proximity to urban services and amenities. Vacant sites in moderate resource areas were considered acceptable for lower income housing if they were already zoned for higher density residential development and had access to piped water and sewer systems.

Vacant sites suitable for lower income housing in low resource areas were only considered acceptable in the Valley region and if they were already zoned for higher density residential development, had access to piped water and sewer systems, and were close to transit, high paying job opportunities, and shops and services. Additionally, the County included Programs 2~~,~~ and ~~12~~13~~, and 19~~ in the Housing Strategy (see Section 5.2) to improve resources in low resource areas. Program ~~19~~ 21 also includes the refinement of the Implementation Action IMP-2021-HW-2 in the County Business Plan to prioritize activities to improve educational, health, and wellness outcomes in low resource areas containing lower income housing sites, specifically unincorporated Fontana, San Bernardino, and Bloomington.

Biological Resources

The County selected sites outside of areas already catalogued as having sensitive biological resources, such as BLM Areas of Critical Environmental Concern, BLM Wilderness Areas/Study Areas, and California Desert National Conservation Lands. While residential development may take place in certain areas of the Mountain region, the County opted not to identify sites in that region to avoid increasing potential impacts on biological resources.

Infrastructure

Sites were only included if they either had known groundwater resources (for onsite wells), could support onsite septic systems (with adequate space for leech fields), or could be served by piped water and sewer systems. The County also only included vacant sites that were served by existing paved roadways, electricity, natural gas, and telecommunications systems.

Parcel Size

Sites were preferred if they were at least one-half acre and no larger than 10 acres when considering suitability for lower income housing. Sites smaller than one-half acre were only included if parcels were owned by the same entity who owned another vacant parcel(s) immediately adjacent to the first parcel, and the aggregate size of those parcels was at least one-half acre. No sites larger than 10 acres were identified as a housing opportunity site for lower income housing.

4. Housing Opportunities

Ownership

Sites were only included if they were owned by private individuals or entities. No sites were included if they were owned by exempt entities (e.g., federal government, tribal entities, state surplus sites, school districts, railroads, and special districts).

Residential Zoning, Density, and Affordability

Rural Living (RL) and Single Residential (RS) districts allowing up to two units per acre were assumed to accommodate large-lot, single family subdivisions using onsite wells for potable water and septic systems for wastewater treatment. Although such large lot development has demonstrated an ability to support homes affordable to lower income households (see Section 4.2), the County has limited its assumptions for lower income capacity through a portion of ADUs~~,~~ and manufactured homes~~, and individual rural single family homes~~ (see Section 4.3).

Single Residential (RS) zoning that allows up to five units per acre requires piped water and sewer systems. ~~Parcels with this zoning were only included if existing water and sewer systems were available.~~ Based on past trends, it can be assumed that future development on land zoned RS will likely be affordable to moderate or above moderate income households. After counting development in the pipeline and projected development based on past trends for ~~ADUs, manufactured homes, and~~ site-built rural single family homes, the County does not need to identify additional capacity for housing on vacant land that would be affordable to moderate or above moderate income households. ~~Accordingly, any capacity on vacant land zoned RS can be assumed to have capacity for above moderate income households.~~

Multiple Residential (RM) zoning allows up to 20 units per acre. For projects where at least 20% of the proposed housing units are reserved for lower income households, the County offers an additional local density bonus to increase maximum density to 25 units per acre in most of the Mountain and Desert regions and 30 units per acre in the Valley region and on parcels in the Desert regions served by piped water, sewer, and paved roads. For projects that apply the County's local density bonus, the maximum densities of 25 and 30 units per acre are the maximum densities that shall be used to calculate density bonus prescribed by state law. A minimum density of 11 units per acre is also required for parcels zoned RM in the Valley region or in the Desert regions when served by piped water, sewer, and paved roads.

Suitability to Accommodate Affordable Housing and Realistic Capacity Assumption

The County considered vacant land with RM zoning and eligible for a maximum density of 30 units per acre to have the capacity to accommodate housing affordable to lower income households. This conclusion was based both on state law, which deems zoning that allows at least 30 units per acre can be presumed to accommodate lower income housing for the purposes of determining RHNA capacity (30 units per acre is the default density for the County given that it is within a Metropolitan Statistical Area with a population of more than 2 million). It is important to note that the ability to access the additional density is conditioned solely on the inclusion of at least 20% lower income housing and the ability to

access piped water and sewer systems. No other requirements must be met and no other conditions are applied.

Additionally, recent affordable housing developments in the Valley region are providing lower income housing at densities of 18.9 units per acre (Las Terrazas, built in 2021), 21.1 units per acre (Bloomington Grove Phases I & II, built in 2016 and 2017, respectively), and 20.8 units per acre (Bloomington Grove Phase III, built in 2021). The Las Terrazas development (Colton SOI) was built at a density below the standard maximum of 20 units per acre and so illustrates that sites zoned RM do not have to take advantage of the County's local density bonus to facilitate affordable housing.

The Bloomington Grove developments (~21 units per acre) illustrate that a housing development with as little as 5% very low income or 10% lower income housing would also not be required to take advantage of the County's local density bonus to facilitate affordable housing since such projects would automatically be eligible for a state density bonus of 20%, which would grant such projects a maximum density of 24 units per acre. However, the County's local density bonus ensure that projects with 20% or more lower income housing do not need any state density bonus to reach the density levels seen in recent affordable housing developments built in the unincorporated county.

The recent affordable housing developments in Bloomington and Colton SOI do, however, indicate that future housing developments can be expected to seek higher densities. The referenced housing developments were all near ~~to~~ or just above the maximum density of 20 units per acre allowed in the County at the time of their application. With the maximum density now increased to 30 units per acre in the Valley region and areas with access to piped water and sewer in the Desert regions (25 units per acre elsewhere), the County could justify an assumption of density for future affordable housing development of 30 units per acre (before any application of state density bonus). To be slightly conservative, the County assumes a future density of 25 units per acre on vacant sites in the Valley region and 20 units per acre on vacant sites in the North Desert region.

An analysis of past development on land designated with RM zoning indicates that most development applications sought densities between 10 and 16 units per acre under regulations that permitted density between 5 and 20 units per acre. This may indicate that the expected density range would be 50% to 80% of the maximum, which translates to a range of 15 to 24 units per acre. However, the County has changed the allowable density from a minimum of 5 and maximum of 20 to a minimum of 11 and maximum of 30 units per acre. Based on the relative position of the past density trends to the overall range (10-16 with a permitted range of 5-20, updated to a permitted range of 11 to 30), the County can assume future density ranges would be between 17 and 25 units per acre. The County also looks to requested development densities on land that might have developed under the RM District had the County allowed the density range it does currently. Looking at market rate housing indicates that desired density range for multifamily development could be anywhere from 25 units per acre (Circa 2020, built in 2015) to 29.6 units per acre (The Standard, expected occupancy by 2024) to 37 units per acre (The Crossings, built in 2021) to 42 units per acre (CR Redlands, expected occupancy by 2024). Past affordable projects developed under different zoning include Las Terrazas (18.9 units per acre) and the various

phases of Affordable Bloomington (20.8 to 21.1 units per acre). All of these densities are between 95% and 210% of the County's previous maximum density of 20 units per acre for the RM District.

Recent development trends in incorporated communities that allowed high density residential up to 30 units per acre throughout much of the prior planning period can help illustrate whether the County could realistically expect to receive interest in housing projects at or above the density assumptions used to project housing capacity. The County focused on identifying recently proposed, approved, and constructed affordable and market-rate housing projects in similar locations and contexts as the vacant parcels listed as housing opportunities. Projects listed from Fontana and Upland serve as examples for vacant sites in Bloomington and unincorporated SOIs for Fontana and San Bernardino (western portion of the Valley Region). Projects listed from Redlands and Yucaipa serve as examples for vacant sites in Mentone (eastern portion of the Valley region). Projects listed from Hesperia and Victorville serve as examples for vacant sites in Barstow, Helendale, and the unincorporated SOI for Victorville (North Desert region).

- Fontana, Levante Apartment Homes, built 2021, 136 units, 5.7 ac, 24 du/ac
- Fontana, Sierra Fountains Apartments, built 2021, 60 units (30-60% AMI), 2.4 ac, 26 du/ac
- Fontana, Multifamily Apartments, approved 2021, 14 units, 0.4 ac, 32 du/ac
- Upland, Alta Apartments, approved 2021, 106 units, 4.5 ac, 24 du/ac
- Redlands, Casa Loma Apartments, approved 2021, 147 units, 5.7 ac, 26 du/ac
- Yucaipa, Villas, 96 units (30-60% AMI), built 2020, seniors, 3.7 ac, 26 du/ac
- Hesperia, Villas Apartment West, built 2016, 95 units, 4.7 ac, 20 du/ac
- Victorville, Old Town Specific Plan, approved 2018/revised 2021, designations for medium-high residential at 15-25 du/ac and mixed use at 18-25 du/ac.

Collectively, therefore, based on all of the past and current development trends, both in the unincorporated and incorporated areas, the County believes the density assumptions of 20 and 25 units per acre are justified and can be used to produce realistic capacity figures based on the proportional densities in past multifamily projects developed in the RM District, density levels sought by unincorporated housing projects outside the RM District (due to the prior maximum density of 20 units per acre), and recent market trends in adjacent incorporated communities.

In 2020, the County redesignated a number of parcels for Medium Density Residential (MDR) through an update of the Land Use Element, Land Use Map, and other components of the Countywide Plan. The adoption process included Resolution No. 2020-197, which clarifies that until the County completes its zoning update to be consistent with the Countywide Plan, a parcel's Policy (General) Plan land use category shall govern, meaning that parcels designated as MDR shall be implemented through the

corresponding zoning land use district of RM. Even without this resolution, the provisions enacted by Senate Bill 330 that enable a property owner to develop under a high density general plan designation even if the zoning is inconsistent were extended to remain in effect until January 1, 2030, which is after the planning period. Accordingly, there are no restrictions in place that would prevent any of the sites identified in Table 4-84 and Appendix A from developing in accordance with the RM zoning land use district, and such sites are listed with a current zoning of RM.

Parcels Identified in the Previous Element

Vacant parcels that were listed in the previous Housing Element were not included unless they were seen as suitable sites for housing affordable to moderate or above moderate households, or when additional justification could be made, or incentives created to increase their likelihood of producing housing affordable to lower income households during the planning period. A total of five vacant parcels identified in the prior Housing Element are again considered in this Element (APNs 025204114, 029826155, 046760102, 046760203, and 308855123—see Appendix A). All five of these parcels are zoned RM. In the prior element, these five sites were limited to a maximum density of 20 units per acre. At the end of the previous planning period, the County adopted local density bonus provisions that increase maximum densities to 25 or 30 units per acre when housing projects reserve at least 20% of the proposed units for lower income households. The maximum density (before the application of any state density bonus provisions) for the nine parcels, when including the 20% lower income units, is now 30 units per acre—a 50% density increase compared to the prior planning period. The County considers this to be a substantial change that will increase the likelihood of development on the nine five sites during this planning period. As part of Program 1, the County will ensure that the five parcels are allowed to be developed for residential use by-right, in accordance with Government Code Section 65583.2(c) as enacted through Assembly Bill 1397. This by-right (without discretionary review) requirement is only for housing developments in which at least 20 percent of the units are affordable to lower-income households—a requirement that also aligns with the local density bonus provision.

4.4.2 VACANT PARCELS

Based on the development criteria described above, the County identified 80 54 parcels, totaling 468about 126.7 acres, that meet the development criteria and are suitable for inclusion in the Sites Inventoryto accommodate the County's remaining RHNA allocation for lower income households. Table 4-84 summarizes the housing capacity of vacant land by unincorporated community and affordability level. Appendix A provides a listing of these sites by parcel and providesalong with additional information. As permitted by HCD, the capacity projected for very low and low income categories are merged into a single lower income category.

Figures 2-17 through 2-204-1 and 4-2 in the Community Profile section depict the location of the vacant parcels listed in Table 4-84. In total, these parcels have the potential capacity to accommodate the remaining lower income RHNA balance after considering pipeline development (Table 4-2) and projected rural single family homes ADUs, and manufactured homes (Tables 4-5 to 4-7).

4. Housing Opportunities

~~Table 4-4 Summary of Residential Capacity of Vacant Land~~

~~Community Planning Area~~	~~Region~~	~~Lower Income~~	~~Above Moderate Income~~	~~Total~~
~~RHNA Balance[1]~~	~~-~~	~~2,283~~	~~1,145~~	~~3,428~~
~~Apple Valley~~	~~North Desert~~	~~-~~	~~478~~	~~478~~
~~**Bloomington**~~	~~Valley~~	~~858~~	~~101~~	~~959~~
~~**Fontana**~~	~~Valley~~	~~419~~	~~198~~	~~617~~
~~**Helendale**~~	~~North Desert~~	~~445~~	~~30~~	~~475~~
~~**Mentone**~~	~~Valley~~	~~112~~	~~233~~	~~345~~
~~**Montclair**~~	~~**Valley**~~	~~**157**~~	~~**-**~~	~~**157**~~
~~**Oak Hills**~~	~~North Desert~~	~~-~~	~~92~~	~~92~~
~~**Phelan/Pinon Hills**~~	~~North Desert~~	~~-~~	~~13~~	~~13~~
~~**San Bernardino**~~	~~Valley~~	~~180~~	~~-~~	~~180~~
~~**Victorville**~~	~~North Desert~~	~~114~~	~~-~~	~~114~~
~~Total Vacant Capacity~~	~~-~~	~~**2,285**~~	~~**1,145**~~	~~**3,430**~~
~~Surplus Capacity~~	~~-~~	~~**2**~~	~~-~~	~~**2**~~

~~Note: 1. RHNA balance after pipeline development (see Table 4-2) and projected ADUs, manufactured homes, and rural single family homes (Table 4-3).~~

Table 4-8 Summary of Residential Capacity of Vacant Land

Community Planning Area	Region	Acres	Parcels	Unique Owners	Lower Income Capacity
RHNA Balance[1]	-	-	-	-	2,582
Bloomington	Valley	28.4	7	6	710
Fontana	Valley	23.3	18	13	552
Mentone	Valley	11.1	7	5	277
Montclair	Valley	6.2	3	2	157
San Bernardino	Valley	4.5	5	5	114
Helendale	North Desert	47.0	10	10	940
Victorville	North Desert	5.7	4	2	114
Total Vacant Capacity	-	**126.2**	**54**	**43**	**2,864**
Remaining RHNA Balance	-	-	-	-	-

Note: 1. RHNA balance after pipeline development (Table 4-2) and projected rural single family homes ADUs, and manufactured homes (Tables 4-5 to 4-7).

~~**Figure 4-1 Housing Opportunity Sites - Valley Region (Vacant)**~~

4. Housing Opportunities

~~**Figure 4-2 Housing Opportunity Sites - North Desert Region (Vacant)**~~

~~4.5 Underutilized Land~~

~~Although the County is able to accommodate the 2021-2029 RHNA allocation through pipeline projects, projected ADU/manufactured/rural development, and vacant sites, the County identified five sites (9 total parcels, 16 total acres) that contain existing development but are appropriate for inclusion in the inventory to serve as surplus capacity. The following provides a description of general assumptions that make these five sites good candidates for reuse and intensification into higher density affordable housing~~

~~4.5.1 Development Trends, Constraints, and Incentives~~

~~The Count considered a number of factors to better understand the suitability of underutilized sites for new residential development. This topics listed below apply to all of underutilized sites and is therefore presented as a summary instead of being repeated in the description of each site. Factors include: development trends and market conditions, property owner interest and public outreach, affirmatively furthering fair housing, environmental or infrastructure constraints, and incentives.~~

~~Development Trends and Market Conditions~~

~~During the 2014-2021 planning period, the County encouraged and helped facilitate the development of multiple affordable multifamily residential units. Two notable projects include the multi-generational Lillian Court & Bloomington Grove in the unincorporated community of Bloomington, and the family-oriented Las Terrazas in the unincorporated Colton sphere. In addition to collectively providing more than 300 units at densities between 19 and 21 units per acre, these developments included critical community facilities, such as childcare services, community centers, and a public library (Bloomington Grove).~~

~~Additionally, 982 units of market rate multifamily development were recently constructed in the unincorporated island surrounded by the City of Redlands through the County's East Valley Area Plan. The Crossings at Redlands (340 units, 9.1 acres, 37 units per acre), Circa 2020 (282 units on 9.54 acres, 29.6 units per acre), and CR The Redlands (360 units, 8.58 acres, 42 units per acre). These affordable and market rate housing developments demonstrate that market conditions for unincorporated land in the Valley region support multifamily development at densities between 19 and 42 units per acre. t~~

~~Based on the above information and density incentives (see below), the County assumed a density of 25 units per acre when projecting potential capacity on the underutilized sites. This figure is below what each site (all zoned RM) could currently utilized (30 units per acre) based solely on the application of the County's local density bonus (prior to any application of state density bonus).~~

~~Property Owner Positions~~

~~Much of the unincorporated Valley region of the county developed as large lot single family homes between 1950 and 1980. This part of the county offered low cost homeownership on large lots (2+ acres) a relatively short distance from the job centers in Los Angeles and Orange counties. The Valley region has heavily urbanized over the past 40 years and many large single family lots are well positioned~~

~~to redevelop into higher intensity housing. In considering which parcels are best positioned, the County evaluated the original date of building construction, the date of subsequent improvements, the last date of sale/transfer, the valuation of the current use, the potential cost of tearing down the existing use, and potential valuation and development capacity based on current zoning and development incentives. Buildings on the five underutilized sites were all constructed multiple decades in the past and the most recent property sale/transfer occurred at least 20 years prior. This means that existing property owners likely paid far below current market rates for land in the Valley region. Additionally, the underutilized sites all contain a single family home but otherwise have no improvements. For someone looking to redevelop the site, the demolition of a single family home is considered to be minimal additional cost, especially compared to between two and five acres of developable land.~~

~~Environmental Resources and Hazards~~

~~There are no environmental hazards that would make future housing development unsafe or increase development costs substantially on any of the five sites. Additionally, the County did not consider sites that would involve the redevelopment of any sites containing existing agricultural operations, important farmlands, or protected biological resources.~~

~~Infrastructure Constraints~~

~~There are no infrastructure constraints that would inhibit future housing development on any of the five sites. The community of Mentone is served by the City of Redlands for water, which currently forecasts no concerns of water supply when considering the net additional development that could be added through the underutilized sites (after also considering future development of pipeline projects, future ADUs, manufactured homes, rural single family homes, and vacant land). The community of Mentone is served by the City of Redlands for wastewater treatment, including a local wastewater treatment plant that has demonstrated adequate capacity to serve the net additional development that could be added through the underutilized sites (after also considering future development of pipeline projects, future ADUs, manufactured homes, rural single family homes, and vacant land).~~

~~Incentives~~

~~To consider a site as a good candidate for reuse, the County identified potential incentives that could encourage an existing property owner occupying an existing use to redevelop or sell the land to someone who would redevelop the property into higher density residential. The primary incentive that was not available during the vast majority of the previous planning period is the County's local density bonus for proposed housing developments in the Multiple Residential (RM) zone that reserve at least 20 percent of units for lower income households. In the Valley region (the location of the underutilized sites), qualifying projects receive an additional 10 units per acre (50% increase over standard density allowance). The County bonus is added before the state density bonus is calculated, which also increases the impact of the state bonus.~~

~~Prior to this local density bonus, an affordable housing development reserving 20% of units for low income housing in the Valley zoned RM would be able to build at 27 units per acre (20 units per acre plus a 35% state density bonus). Now, with the local density bonus added in before the application of a~~

~~state density bonus, the same project would be able to build at 40.5 units per acre (30 units per acre plus a 35% state density bonus). This means that the County's incentives facilitate a 100% density increase after the application of the County's and state's density bonus provisions. The resulting density levels will enable affordable housing developers to pay more for the land and comparable to what market rate developers would pay to increase the likelihood of affordable housing being constructed.~~

~~Affirmatively Furthering Fair Housing~~

~~The County evaluated its Site Inventory, including underutilized sites, through the lens of affirmatively furthering fair housing, consistent with new state laws enacted through Assembly Bill 686 (2018). Outside of the Valley region, there is either too much vacant land or too many environmental or infrastructure constraints to justify the reuse of already developed sites for higher density lower income housing. Within the Valley region, there are only a few unincorporated areas designated as high or highest resource areas according to the California Tax Allocation Committee (TCAC) mapping (see Figure 4-1 for reference). The only unincorporated areas with land in a high or highest resource area that also satisfy other criteria referenced above are found in the community of Mentone.~~

~~4.5.2 Descriptions of Individual Sites~~

~~Underutilized Site 1 (U1)~~

~~Site U1 consists of four parcels owned by the same entity totaling 5.4 acres in central Mentone bound by Crafton Avenue to the west and surrounded by commercial uses to the north, mobile homes to the east, and multifamily to the south. Three parcels are vacant and the fourth parcel contains a single family home that was built in the 1920s, renovated in the 1930s, and last sold in 1988. This site is currently zoned as Multiple Residential, which allows for the development of multifamily residential products at a maximum density of 20 units per acre or 30 units per acre with affordable housing. Assuming residential development occurs at a density of 25 units per acre, 134 lower income units could be constructed on this site.~~

~~Underutilized Site 2 (U2)~~

~~Site U2 is a 2.43-acre parcel in central Mentone bound by Colton Avenue to the south and surrounded by single family homes to the north, east, and west. Vehicular access to Colton Avenue is guaranteed through an access easement across the frontage parcel. A single family home was built on the property in 1948 and last sold in 1983. The site is otherwise used as offsite storage. The zoning is Multiple Residential, which allows for the development of multifamily residential products at a maximum density of 20 units per acre or 30 units per acre with affordable housing. Assuming residential development occurs at a density of 25 units per acre, 61 lower income units could be constructed on this site.~~

4. Housing Opportunities

~~Underutilized Site 3 (U3)~~

~~Site U3 is a 2.1-acre parcel adjacent to Site U2 in central Mentone bound by Colton Avenue to the south and surrounded by single family homes to the north, east, and west. A single family home was built on the property in 1952 and last sold in 2001. The site is currently zoned as Multiple Residential (RM), which allows for the development of multifamily residential products at a maximum density of 20 units per acre or 30 units per acre with affordable housing. Assuming residential development occurs at a density of 25 units per acre, 53 lower income units could be constructed on this site.~~

~~Underutilized Site 4 (U4)~~

~~Site U4 is a 2.1-acre parcel in central Mentone surrounded by a vacant parcel to the north, multifamily to the west, mobile homes to the east, and single family homes to the south. Vehicular access is provided via a public right-of-way along the western edge. A single family home was built on the property in 1952 and last sold in 1986. The site is currently zoned as Multiple Residential (RM), which allows for the development of multifamily residential products at a maximum density of 20 units per acre or 30 units per acre with affordable housing. Assuming residential development occurs at a density of 25 units per acre, 53 lower income units could be constructed on this site.~~

~~Underutilized Site 5 (U5)~~

~~Site U5 consists of two parcels owned by the same entity, totaling 3.7 acres in northern Mentone. The site is surrounded by a vacant parcel to the north and single family residential development to the east and west. A single family home was built on the property in 1970 and last sold in 1971. The site is currently zoned as Multiple Residential (RM), which allows for the development of multifamily residential products at a maximum density of 20 units per acre or 30 units per acre with affordable housing. Assuming residential development occurs at a density of 25 units per acre, 93 lower income units could be constructed on this site.~~

~~Table 4-5 summarizes the information for and capacity of underutilized land.~~

~~Table 4-5 Summary of Residential Capacity of Underutilized Land~~

~~APNs~~	~~Existing Use~~	~~GP / Zone~~	~~Acres~~	~~Density (du/ac)~~		~~Lower Income Capacity~~
				~~Assumed~~	~~Max~~	
~~029822125, 029822126, 029822140, 029822147~~	~~1 SFD / storage~~	~~MDR / RM~~	~~5.4~~	~~25~~	~~30~~	~~134~~
~~029823125~~	~~1 SFD / storage~~	~~MDR / RM~~	~~2.4~~	~~25~~	~~30~~	~~61~~
~~029826129~~	~~1 SFD / storage~~	~~MDR / RM~~	~~2.1~~	~~25~~	~~30~~	~~53~~
~~029823139~~	~~1 SFD~~	~~MDR / RM~~	~~2.1~~	~~25~~	~~30~~	~~53~~
~~029825134, 029825135~~	~~1 SFD / storage~~	~~MDR / RM~~	~~3.7~~	~~25~~	~~30~~	~~93~~
		~~**Underutilized Sites Totals**~~	~~**15.7**~~	~~--~~	~~--~~	~~**394**~~

4. Housing Opportunities

~~Figure 4-3 Housing Opportunity Sites - North Desert Region (Underutilized)~~

~~4.6~~4.5 SUMMARY OF HOUSING OPPORTUNITIES

The unincorporated county areas contain a tremendous amount of housing opportunities throughout its valley, mountain, and ~~desert regions~~Desert regions. Table 4-9 compares the total capacity identified in this Element compared to the RHNA allocation~~Tables 4-6 and 4-7 illustrate the housing opportunities varied by housing type and housing location~~.

Jurisdictions are required to ensure the capacity for any unmet RHNA allocation for each income category throughout the entirety of the planning period (enacted through SB 166, No Net Loss, 2017). During the planning period, the County will only obtain RHNA credit based on the actual affordability of the housing constructed. If the combined housing opportunities ever fall short of providing 100% capacity for the unmet RHNA allocation, the County will be required to identify new opportunity sites (including rezoning if necessary). There is and will continue to be an abundance of housing sites suitable for above moderate income households and the County anticipates satisfying its moderate income RHNA allocation through housing developments already in the pipeline along with projected development of and capacity for additional ~~ADUs, manufactured homes, and~~ rural single family homes.

~~As with most jurisdictions, the risk of falling below 100% capacity is typically limited to the lower income RHNA allocation. HCD recommends that jurisdictions identify surplus capacity for the lower income RHNA allocation to avoid triggering a requirement to identify new sites (and potentially the requirement to rezone one or more sites). Table 4-6 compares the total capacity identified in this Element compared to the RHNA allocation, indicating surplus capacity in each category, including a surplus of 469 units (13%) for the County's lower income RHNA allocation. This should provide the County with an appropriate buffer while avoiding the need to rezone any sites from their current designations.~~

The unincorporated areas continue to offer lower cost land (compared to incorporated jurisdictions), which results in opportunities for lower and moderate income households to purchase a single family home (especially in the ~~desert regions~~Desert regions) at market rates (unsubsidized). Current interest and applications for housing remains strong and projects that have already been approved and projected trends of units that will be constructed in the planning period will satisfy a substantial portion of the County's total RHNA allocation. The County was able to identify enough vacant sites that are free from constraints and have suitable zoning to facilitate additional market rate and affordable housing and address the balance ~~of~~of the lower income ~~and above moderate income~~ RHNA allocation.~~To provide a surplus in capacity for the lower income RHNA allocation, the County was able to identify a handful of underutilized sites in the Valley region sites that are free from constraints, have suitable zoning, are in a high resource area, and exhibit characteristics that make them good candidates to be intensified from their current use into higher density affordable housing.~~

4. Housing Opportunities

Table 4-96 Summary of Housing Opportunities by Income Category

Unit Type	Lower Income	Moderate Income	Above Moderate Income	Total
Pipeline Housing Projects	406406	1,1961,398	1,3821,671	2,9843,666
Projected Rural Single Family Homes	-260	490354	1,106899	1,5961,513
Projected Accessory Dwelling Units	217295	-179	-39	217513
Projected Manufactured Homes	334104	-149	-17	334270
Capacity on Vacant Land	2,8642,285	---1	1,2821,145	4,1463,430
Capacity on Underutilized Land	394	--1	--1	394
Total Capacity	**3,821935**	**2,0811,686**	**3,770**	**9,7869,277**
RHNA Allocation	**3,539**	**1,523**	**3,770**	**8,832**
Surplus Capacity	**396**	**558**	**0**	**954**

Note: While ADUs, manufactured homes, and vacant residentially-zoned land have capacity to facilitate additional housing affordable to moderate and above moderate income households, 1. Nthe capacity is shown is limited to what is necessary to accommodate the County's RHNA allocation due to surplus from the combined pipeline development, projected housing development, and/or capacity on vacant land.

Table 4-7 Summary of Housing **Opportunities by Region**

Unit Type	Valley	Mountain	North Desert	East Desert	Total
Pipeline Housing Projects	1,381	269	1,622	394	3,666
Projected Accessory Dwelling Units	220	71	101	121	513
Projected Manufactured Homes	15	37	176	42	270
Projected Rural Single Family Homes	227	310	493	483	1,513
Capacity on Vacant Land with Suitable Zoning	2,258	-	1,172	-	3,430
Capacity on Vacant Land with Suitable Zoning	394	-	-	-	394
Total Capacity	**4,495**	**687**	**3,564**	**1,040**	**9,786**

5. HOUSING PROGRAMS

5.1 EVALUATION OF 2014–2021 PROGRAMS

The previous Housing Element included appropriate goals and policies to encourage affordable housing and meet the requirements of state law. The update to the Housing Element includes the following evaluation of the previous goals, objectives, and policies to better understand how the County can and/or should take stronger action toward providing and maintaining quality affordable and market rate housing throughout the unincorporated communities. Table 5-1 identifies and evaluates all of the housing programs in the 2014–2021 Housing Element, including their level of achievement and recommendations for future activity.

Table 5-1 Review of Previous Housing Element

Program	Implementation	Result/Effectiveness	Change
1. Land Use Inventory **Maintain an expansive land inventory identifying sites that could accommodate housing at a variety of affordability levels based on the permitted density of development (apartments, townhomes, single-family homes, mobile homes)**	**Objectives:** Maintain and refine the housing sites list, update the screening methodology for water and sewer services, and use the site inventory to integrate into the upcoming updates of the 14 community plans. Petition SCAG to prepare RHNA transfer estimates whenever an annexation or incorporation is proposed. **Timing:** 2012-2014	Retained inventory Incorporated community plan goals and policies into County Policy Plan and housing options into Land Use Plan Coordinated with SCAG but RHNA transfers minimal See Program 2 regarding water and sewer	Modify to reflect new RHNA allocation
2. Infrastructure Services **Emphasize adequate infrastructure for future growth (transportation, energy, recreational trails, flood control, water supply, sewer, parks, solid waste, and telecommunications)**	**Objectives:** Work with special districts to develop policies and procedures; produce a development impact fee analysis that identifies the cost of providing infrastructure and services to areas of the unincorporated county. **Timing:** complete within one year of adoption	Conducted comprehensive water and wastewater analysis; new policies adopted into Land Use and Infrastructure & Utilities Elements to ensure safe, adequate, and fiscally sustainable infrastructure Initiated development impact fee (DIF) study and put on hold as preliminary findings and policy direction indicated adjustments unnecessary	Update DIF analysis and continue to update user fees as necessary with County Special Districts
3. Energy Conservation **Implement the Green County San Bernardino initiative, to spur the use of "green" technologies and building practices**	**Objectives:** Implement and publicize components of programs such as energy efficient upgrades, building permit fee waivers, and publicizing of energy efficiency tips	Implemented components such as: (activity / annual energy saved per unit) - 298 re-roof permits /199.7 kWh - 92 windows replaced / 564 kWh - 56 bathroom remodel / 58,246 gal	Continue current efforts to update Development Code; adopt new state Building Code

5. Housing Programs

Table 5-1 Review of Previous Housing Element

Program	Implementation	Result/Effectiveness	Change
	Timing: Ongoing	- 233 HVAC changeout / 501 kWh Conducted tremendous public outreach effort (San Bernardino County Partnership for Renewable Energy and Conservation (SPARC) to support a new Renewable Energy and Conservation Element (RECE), adopted in 2017 and updated in 2019 to reflect additional public input Initiated Development Code update in 2020 to reflect new standards and objectives of RECE	standards as available
4. Density Incentives **Offers a housing incentives program modeled after state law**	**Objectives:** Continue implementation of program **Timing:** Ongoing	No density bonus applications submitted In mid-2021, the County updated Development Code to reflect changes in state density bonus and to add an additional County density bonus that increases the maximum density of the Multiple Residential District from 20 to 30 units per acre for projects that include affordable housing (County density increase activates before and serves as basis for state density bonus)	Continue with modifications made in mid-2021 to further encourage use of density incentives
5. Governmental Constraints **Update the Development Code to mitigate potential constraints to development, maintenance, and improvement of housing affordable to low and moderate income households and households with special needs**	**Objectives:** Review and revise County development code **Timing:** Ongoing	A detailed update of the County Development Code is underway, with a public review draft expected ~~Spring 2022~~in 2023	Continue and incorporate necessary updates from recent state laws
6. Home Repair Assistance **Reactivate Home Repair assistance programs when feasible or to develop long-term relationships with mission-driven organizations to provide these types of services**	**Objectives:** Seek funding and partnerships to restart the home repair program **Timing:** Ongoing	Directed unincorporated residents to Neighborhood Partnership Housing Services (NPHS) Renaissance Home Repair Loan	Continue to pursue HUD grant funding through Consolidated Plan
7. Code Enforcement **Administer and enforce County ordinances and**	**Objectives:** Implement and publicize code enforcement. Seek additional funding	Conducts the Community Clean Up Program, which took place in 11 community clean up events	Continue existing program and

Table 5-1 Review of Previous Housing Element

Program	Implementation	Result/Effectiveness	Change
state/federal laws relating to land use, zoning, housing, public nuisances, vehicle abatement, and vegetation/fire hazards abatement	opportunities to reactivate neighborhood-scale code enforcement **Timing:** Ongoing	throughout the county collecting a total of (2020/2021 figures) 120/170 tons of trash/bulky items, 80/73 tons of waste tires, and 8/12 tons of e-waste The Proactive Community Enforcement (PACE) program has been successful in the past, but the County was unable to secure adequate funding to restart the program	consider alternatives to the PACE program
8. Homeownership Assistance **Offer down payment assistance loans, federal income tax credits, and below-market-rate loan programs through the Mortgage Credit Certificate (MCC) and Neighborhood Stabilization Program (NSP) programs.**	**Objectives:** Implement and publicize program. Seek funding opportunities to provide additional means to improve homeownership opportunities. **Timing:** Ongoing	Directed unincorporated residents to Neighborhood Housing Services of the Inland Empire CalHOME Mortgage Assistance Loan, NPHS Opportunity Down Payment and Closing Cost Assistance Program	Continue with referrals and seek additional funding through Consolidated Plan
9. Rental Assistance **Provide rental assistance programs for income-eligible households, and eligible homeless families and individuals**	**Objectives:** Continue implementation of federally funded housing voucher program **Timing:** Ongoing	The tenant based voucher program operated by the Housing Authority of the County of San Bernardino (HACSB) served 10,798 rental households countywide	Continue voucher program
10. Public Housing Modernization Program **Transform the aging and dilapidated 252-unit Waterman Gardens Public Housing site (City of San Bernardino) and 115-unit Lugonia site (Redlands) into safe and affordable housing sites**	**Objectives:** Modernize the Waterman Garden and Lugonia Projects. Complete other capital improvement and modernization plans. **Timing:** 2011-2014	HACSB partnered to transform the Waterman Gardens site into 411 new affordable units along with community centers and supportive services (now known as Arrowhead Grove) HACSB partnered to transform the Lugonia site into 228, two-story modular affordable units (now known as Valencia Grove)	Continue program and seek opportunities to modernize additional sites
11. Preservation of At Risk Housing **Regularly identify at-risk structures to preserve local affordability**	**Objectives:** Annually update the status of at-risk housing projects to identify projects at risk of conversion and partner with organizations to assistance in preserving affordability of the projects. **Timing:** Ongoing	Status of at-risk housing documented annually; none at-risk (either distant expiration dates; units owned by County, or subsidized rents above market rents)	Continue to monitor status of assisted units

5. Housing Programs

Table 5-1 Review of Previous Housing Element

Program	Implementation	Result/Effectiveness	Change
12. Affordable Rental Housing Development **Facilitate and encourage the production of affordable multiple-family rental housing throughout the County**	**Objectives:** Implement and publicize program **Timing:** Ongoing	HACSB partnered to construct Bloomington Grove (288 affordable units over three phases) and Las Terrazas (unincorporated Colton, 112 affordable units) projects	Continue program and seek opportunities to add new affordable rental housing
13. Fair Housing Program **Contract with the Inland Fair Housing and Mediation Board (funded by CDBG) to provide services including: tenant and landlord mediation, mobile home mediation, housing counseling, investigation of unfair practices, and senior services**	**Objectives:** Implement and publicize program **Timing:** Ongoing	Complaint information isolated to unincorporated area was unavailable. 21 housing complaints in San Bernardino County in 2019, all resolved.	Continue to contract with Inland Fair Housing and Mediation Board; expand activities to address AB 686
14. Homeless Services **Direct the planning, development, and implementation of the County's 10-year Strategy to End Chronic Homelessness, implementing a complete Continuum of Care approach**	**Objectives:** Implement and publicize program **Timing:** Ongoing	County Office of Homeless Services implement the 10-year Strategy and associated HUD Continuum of Care grants Assisted over 1,000 veterans into permanent supportive housing Established coordinated entry system, San Bernardino County Homelessness Partnership, Project Roomkey, and reunification services (and many other programs/services)	Continue ongoing efforts to address homelessness
15. Senate Bill 2 Compliance **Update Development Code to address SB 2, including definitions and permit requirements for: emergency shelters, transitional housing, and permanent supportive housing**	**Objectives:** Update Development Code **Timing:** Within one year of adoption of the Housing Element	Updated Development Code; new updates to reflect recent changes in state law are in process	Complete new updates within one year of Housing Element adoption
16. Lower Income Households **Offer housing programs and services to address the special needs of its extremely low, very low, and lower income residents.**	**Objectives:** Implement and publicize programs **Timing:** Ongoing	Implementation of Housing Voucher Rental Assistance (see Program #9), Mainstream Program, Housing Opportunities for Persons with AIDS (HOPWA), and Veterans Affairs Supportive Housing (VASH) for qualified lower income households	Consolidate with other programs and continue efforts

Effectiveness in Addressing Special Needs

In the prior planning period, the County implemented programs and applied policies to address numerous special needs populations. The County implemented the 10-year Homeless Strategy and associated HUD Continuum of Care grants, assisting over 1,000 veterans into permanent supportive housing. The County Housing Authority implemented a countywide voucher program serving over 10,000 rental households, with the vast majority earning less than 30% of the aera median income (extremely low income households) as well as elderly and single-parent households (with substantial overlap). The County Housing Authority also provided hundreds of units of family housing through two projects in incorporated jurisdictions and senior and family housing in unincorporated Bloomington.

5.2 HOUSING STRATEGY FOR 2021–2029

The following describes the primary programs to be utilized by the County of San Bernardino and its various participating partners to address the goals and policies of the housing element for the 2021–2029 planning period. The Housing Strategy consists of a set of goals, policies, programs, and quantified objectives to address the six categories cited in state law (Government Code Section 65583) for the 2021-2029 planning period.

1. Providing adequate sites to achieve a variety and diversity of housing

2. Assisting in the development of affordable housing

3. Removing governmental constraints (as necessary)

4. Improving the conditions of existing affordable housing

5. Preserving assisted housing developments at-risk of conversion to market-rate

6. Promoting equal housing opportunity

For each topic area, implementing programs are described in the following detail:

- Brief statement of action, including specific County role in implementation
- Objective(s), quantified when applicable
- Agency or department responsible for action implementation (the reference is to a County agency or department unless otherwise indicated)
- Targeted financing or funding source
- Estimated timeframe for implementation

5.2.1 PROVIDING ADEQUATE SITES FOR A VARIETY AND DIVERSITY OF HOUSING

Program 1. Land Use Inventory

The County will monitor the status of all sites identified in the land inventory to track progress toward the RHNA allocation. If necessary, the County will identify new developable sites with adequate zoning to maintain 100% capacity to accommodate any remaining RHNA allocation (total RHNA allocation less units permitted and/or built on or after June 30, 2021), in accordance with state law provisions enacted through Senate Bill 166 (2017). Additionally, if necessary, the County will rezone sites that are developable to maintain 100% capacity to accommodate any remaining RHNA allocation. The County will also coordinate with incorporated jurisdictions and submit a petition to SCAG to prepare RHNA transfer estimates whenever an annexation or incorporation is proposed.

Additionally, to comply with AB 1397, sites with the following APNs listed in Appendix A (025204114, 029826155, 046760102, 046760203, and 308855123), in this 6th cycle Housing Element shall be allowed to be developed for residential use by-right, in accordance with Government Code Section 65583.2(c). This by-right (without discretionary review) requirement is only for housing developments in which at least 20 percent of the units are affordable to lower-income households. The application of the requirement should not be used to further constrain the development of housing. As such, housing developments that do not contain the requisite 20 percent would still be allowed to be developed according to the underlying (base) zoning.

Objective: Monitor and maintain a land inventory of developable and appropriately zoned sites to accommodate housing at a variety of affordability levels based on the County's RHNA allocation. Coordinate with incorporated jurisdictions and SCAG to transfer RHNA allocation upon annexation or incorporation. Comply with California Government Code Section 65583.2(c).

Responsibility: Land Use Services

Funding Source: General Fund

Timeframe: 2022 to 2029

Program 2. Sewer Expansion in Bloomington

While infrastructure is in place for nearly all of the sites identified to accommodate the County's RHNA allocation, many of the sites in Bloomington will require sewer improvements to realize their full development potential. The County is currently preparing a technical study to define the treatment capacity and system expansion needed to support additional growth in Bloomington consistent with the Housing Element and County Land Use Map. This study is slated for completion in late 2022 and will involve direct coordination with the City of Rialto (wastewater treatment provider and primary incorporated entity for the sphere of influence). The study will provide recommended options and alternatives along with cost implications and funding mechanisms for near-term implementation concurrent with future housing development. This work will build off of previous sewer expansion associated with the Valley Corridor Specific Plan and northern Bloomington service area.

Objective: Prepare and finalize sewer expansion plan for Bloomington Community Planning Area. Coordinate with City of Rialto on subsequent expansion concurrent with development.

Responsibility: Special Districts, Land Use Services

Funding Source: Local Early Action Planning (LEAP) Grant, General Fund

Timeframe: Plan finalized within one year of adoption of the housing element, implementation concurrent with development

Program 3. Accessory Dwelling Units

The County adopted updates to the ADU ordinance in 2020 to comply with state law and will update it to comply with any new state requirements. The County will also prepare (and maintain) an ADU informational flyer to encourage homeowners to construct ADUs, particularly as rent-free or minimal cost ADUs for a property owner's adult children or aging parents who may need housing but qualify as an extremely low income household. The County will also coordinate through the San Bernardino Council of Governments (SBCOG) to evaluate pre-approved ADU site plans prepared in other jurisdictions with similar topography and conditions that would be appropriate for various unincorporated communities. The County will also consider reducing or waiving fees for ADUs proposed in high/highest resource areas (per TCAC mapping) when the ADUs are reserved for lower income households.

The County will also update its rental dwelling unit license agreement to include or edit the following fields: add estimated rent to be charged, add estimated renter household size, and adding ADU and JADU options to the dwelling unit type.

Objective: Permit approximately ~~75 to 95~~ 20 to 30 ADUs each year on average ~~(50 to 60 lower income each year on average)~~ affordable to lower income households; evaluate and identify appropriate pre-approved ADU site plans. Continue to track affordability during the permitting stage.

Responsibility: Land Use Services

Funding Source: General Fund

Timeframe: Monitor and update ADU ordinance as necessary based on new state laws, coordinate through SBCOG to evaluate and identify appropriate pre-approved ADU site plans by 2023, and confirm the fiscal impact by 2022 and implement by 2023, a reduction in or waiver of development fees (to the maximum extent feasible) for ADUs proposed in high/highest resource areas (per TCAC mapping) when the ADUs are reserved for lower income households.

The County will also monitor progress of ADU permitting, construction, and affordability levels (including those that are rent-free and thus affordable to extremely low income households) on a quarterly basis until actual activity matches projected trendline, with semi-annual monitoring once actual activity matches projected trendline through 2024 and annually thereafter throughout planning period. If, by July 1, 2023, ADU activity is:

- Within 5% of projected trendline; no change necessary
- Within 10% of projected trendline, identify and initiate efforts to bolster outreach and awareness
- Within 25% of projected trendline evaluate whether ADU capacity is needed to maintain adequate capacity to accommodate the City's RHNA allocation. If ADU capacity is needed, identify and initiate additional actions by the end of 2023 to increase ADU activity to necessary levels.
- More than 25% below projected trendline, reduce projections to match actual activity between June 30, 2021, and June 30, 2023; if ADU activity is expected to increase between July 1, 2023, and December 31, 2023, reduce projections to match actual activity between June 30, 2021, and December 31, 2023.
- If revising projections to match actual activity by June 30, 2023 would cause the County to fall below the ability to accommodate 100% of its RHNA, the County will identify additional vacant or underutilized land that has appropriate zoning, is free from development constraints, and can accommodate the shortfall by December 31, 2023. If rezoning is needed, the County will complete rezoning by December 31, 2023. The County will take into consideration the need to affirmatively further fair housing by ensuring any additional sites do not concentrate lower income housing and by identifying new sites in high or higher opportunity areas.

Program 4. Short-term Rentals

The proliferation of short-term, whole-home rentals can reduce the amount of available rental housing (particularly that which is affordable) for people who work in a seasonal and permanent basis in the Mountain and Desert regions (and drive up the cost of housing in the Valley region). Short-term rentals may also have a negative impact on local hotel/motel businesses. The County permits private homes, including ADUs, to serve as short-term rentals in the Mountain and Desert regions (maximum stay of 30 days). In the Valley region, private homes or ADUs must be rented for a term longer than 30 days.

To increase the availability of long-term housing options, the County will conduct a public planning process and a study to determine if the County should establish a limit on the number of private homes or ADUs that can be developed and used as short-term rentals in the Mountain and Desert regions. The study should also evaluate the potential effectiveness of various incentives to encourage long-term rentals, particularly for local employees and lower income residents. If the study identifies a significant negative effect on the supply of affordable rental housing and/or motel/hotel industry, the County will establish incentives to encourage long-term rentals and/or limit the number of total and/or new short-term rentals that can be permitted in the Mountain and Desert regions.

Objective: Conduct a public planning process and study to determine the current and projected impact of short-term rentals on the housing supply throughout the unincorporated county and on the motel/hotel businesses in the Mountain and Desert regions. Establish and implement strategies based on the study's findings. Update and resubmit 2018 through 2021 annual progress reports (APRs) and ensure that future reports account for units (ADUs, site-built homes, or manufactured homes) that apply for a short-term rental permit and communicate this information to HCD to remove such units from being counted as long-term housing units (at any level of affordability).

Responsibility: Community Development and Housing, Land Use Services

Funding Source: General Fund

Timeframe: Initiate study in 2022 and complete public outreach and engagement in 2023, with a target completion date no later than 20234. Establish and begin implementation of recommended solutions by 2024 if the study's conclusions support the establishment of incentives and/or a limitation (by region and/or for specific unincorporated communities). By March 2023, bring forward an interim cap for consideration by the Board of Supervisors on the total number of short-term rental permits on an annual basis and/or a percentage of total housing units within each community planning area in the Mountain and Desert regions. Update 2018-2021 APRs in 2022 and adjust future APRs annually to remove units used for short-term rentals.

Program 5. SB 330 and SB 8 No Net Loss Downzoning

The County will ensure compliance with state law enacted through Senate Bill 330 (2019), as updated through Senate Bill 8 (2021), and prohibit amendments to the general plan or zoning of properties in a manner that would reduce residential density compared to the designation/district in effect as of January 1, 2018, without concurrent upzoning of equal capacity on property elsewhere in the unincorporated county (or incorporated areas if concurrent annexation or incorporation takes place).

Objective: Maintain consistency with state law.

Responsibility: Land Use Services

Funding Source: General Fund

Timeframe: 2022 to 2029 (current sunset of state law provisions is January 1, 2030)

5.2.2 ASSIST IN THE DEVELOPMENT OF AFFORDABLE HOUSING

Program 6. Rental Assistance

The Housing Authority of San Bernardino County (HASB) provides various rental assistance programs for income-eligible households, and eligible homeless families and individuals. The HASB works through its partner agencies to acquire, rehabilitate, deed restrict, and manage an expanding portfolio of affordable rental housing for residents in the unincorporated and incorporated areas of the county. Some of these programs include: Housing Choice Vouchers (Section 8/County Emergency Housing Vouchers), Mainstream Vouchers (5-Year and Section 811), Housing Opportunities for People with AIDS (HOPWA), and Veteran's Affairs Supportive Housing (VASH).

Objective: 455 households; ~~C~~continue implementation of federally funded programs.

Responsibility: Housing Authority, Community Development and Housing

Funding Source: General Fund

5. Housing Programs

Timeframe: 2021-2029

Program 7. Acquisition and/or Construction of Multifamily Rental Units

The County has a long-standing program to facilitate and encourage the production of affordable multiple-family rental housing throughout the county. This program uses three primary sources of funds—HOME, Neighborhood Stabilization Program (NSP), and Mortgage Revenue Bonds. Funds have been used to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing within specific geographic areas. The County will support the development of affordable rental housing, including projects located near job centers that will be affordable to service employees and other low-wage members of the workforce.

Objective: ~~16~~ 66 housing units and seek funding to expand ability to fund additional units

Responsibility: Community Development and Housing

Funding Source: HOME, NSP, Mortgage Revenue Bonds

Timeframe: 2022 and ongoing

Program 8. Public Housing Modernization Program

The County of San Bernardino Housing Authority owns thousands of federally assisted and affordable housing units throughout the County. The County recently undertook an extensive modernization program in two public housing projects (Waterman Gardens/Arrowhead Grove and Lugonia/Valencia Grove). For the 2021-2029 planning period, HACSB will continue to evaluate its inventory of federally assisted and affordable housing units and identify candidates for its housing modernization program.

Objective: Identify candidate sites for modernization.

Responsibility: HACSB, Community Development and Housing

Funding Source: Federal funds and LIHTC

Timeframe: 2021-2029

Program 9. Sewer and Water Service Priority

To comply with Government Code Section 65589.7, the County will continue work with its Special Districts to ensure that appropriate water and sewer management plans are in place and that written policies and procedures are in place that guarantee priority water and sewer service in situations where projects with deed-restricted units affordable to lower income households are proposed. The County will also provide the Housing Element promptly to external water and sewer providers so that such providers can ensure similar policies and procedures are in place for the 2021-2029 planning period.

Objective: Work with Special Districts to develop policies and procedures to implement Government Code Section 65589.7. Distribute final Housing Element to external sewer and water providers upon adoption.

Responsibility: Land Use Services, Special Districts

Funding Source: General Fund

Timeframe: Distribution upon adoption of Housing Element, ongoing for internal coordination

Program 10. Homeless Strategic Plan

The County maintains an annual Homeless Strategic Plan to increase the efficacy and expand the impact of the County's housing and homeless programs. The Strategic Plan encompasses four broad strategies: 1) system and policy change to address the root causes of homelessness, 2) expand homelessness prevention and housing programs, 3) create healthy communities to improve the quality of life for unsheltered individuals, and 4) continue to expand coordination between systems, increase the use of data to improve programs, and increase training opportunities for all partners.

Objective: The quantified objectives from the four strategies are listed below.

- **System and policy change.** Invest in public and private partners to develop diverse types of housing at lower costs to meet the socioeconomic needs of San Bernardino County residents and develop affordable housing to house an additional 500 individuals in permanent housing in 2022.

- **Homeless prevention and housing**. Serve 1,800 people per year with homeless prevention services (such as rental supports to pay arrears, first and last month's rent, and security deposits) through partnership and investments in the Continuum of Care (CoC) providers.

- **Healthy and safe conditions**. Increase temporary housing and shelter capacity by 100 year-round beds to reduce the number of people living outside and enhance community safety through partnerships with cities, and community and faith-based organizations.

- **Coordination, data, and training.** Increase utilization rate of temporary and shelter beds from 88% to 95% by incorporating data informed decision making; providing trauma-informed and culturally-responsive training; developing an inventory of best practices in use by government and regulatory agencies throughout the county; maximizing outreach, referrals, and coordination efforts; and system improvements to the Coordinated Entry System and data systems.

Responsibility: County Administrative Office, Community Development and Housing, Health and Human Services

Funding Source: HOME, No Place Like Home (NPLH), Permanent Local Housing Allocation (PLHA), Homekey, Homeless Housing, Assistance, and Prevention (HHAP), Emergency Solutions Grant (ESG), and other social service programs

Timeframe: Annual update to strategic plan and evaluation of objectives

Program 11. Manufactured Homes

The County will promote the use of manufactured housing for lower income households in rural areas by increasing awareness USDA Section 502 Direct Loan and CalHFA USDA programs, as well as other financing and down payment assistance programs (CalHFA, CalPLUS FHA, CalHFA VA, and MyHome Assistance programs). The County will also coordinate with developers, individual manufacturers, and the California Manufactured Housing Institute (CMHI) to explore other methods of assistance and to develop informational brochures and/or website content to be used as an outreach and educational tool.

Objective: Promote the continued creation of manufactured homes affordable to lower income households, maintaining an average of 44 per year between 2022 and October 15, 2029. Create informational brochures and identify up to three additional methods to encourage and facilitate the creation of lower income manufactured homes. Deploy at least one of these additional methods no later than one year following a year when the average number of manufactured homes affordable to lower income households that have been issued building permits falls below 33 (25% below trend needed); continue deploying additional methods until average returns to at least 44 per year (or 47 per year if measured between June 30, 2021 and October 15, 2029 – 8.33 year projection period). Alternatively, identify additional vacant land that is free of constrains and has suitable zoning to accommodate lower income housing equal to the shortfall (delta between observed annual average and projected average of 44 per year multiplied times the remaining years in the planning period, or overall average of 47 per year as measured for the entirety of the RHNA projection period).

Responsibility: Community Development and Housing, Land Use Services

Funding Source: General Fund

Timeframe: 2022-2029 for creation of new units, 2023 for coordination with CHMI and others on informational brochures and additional methods to facilitate lower income units; additional actions as needed on an annual basis

5.2.3 REMOVE GOVERNMENTAL CONSTRAINTS

Program ~~11~~12. Zoning for a Variety of Housing Types~~Transitional Housing and Low Barrier Navigation Centers~~

The County will update its Development Code to ensure compliance with the latest state laws regarding certain types of housing, including those types of housing listed below. Prior to the formal update, the County will regulate and permit such housing in compliance with state law.

- **Parolee and probationer housing.** ~~. This includes u~~Updating the definition and permitting process for parolee and probationer housing is so that it is considered to be and permitted as transitional housing (which must be allowed in all zones allowing residential with the same approval process as the same type of development).

- -**Low barrier navigation centers.** ~~This also includes a~~Adding low barrier navigation centers as an explicitly defined and permitted use that is allowed by right in all zones allowing mixed uses and all nonresidential zones allowing multifamily residential.

- **Permanent supportive housing.** Adding permanent supportive housing as a use that is allowed by-right in zones where multifamily and/or mixed-uses are permitted, including nonresidential zones permitting multifamily uses.

- **Single room occupancy (SRO) units.** Adding SRO units as an explicitly defined and permitted use, either by-right or with a conditional use permit subject to objective standards and conditions, in the RM District.

- **Employee housing.** Amend the Development Code as necessary to ensure compliance with Health and Safety Code sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.

- **Residential care facilities.** Amending the permitting requirements for licensed and unlicensed care facilities that serve either six or fewer, or seven or more residents, to subject such facilities to objective standards, consistent with state law and fair housing requirements. Amending, if necessary, the definition of residential care facilities or spacing requirements for unlicensed care facilities.

Objective: Update Development Code in compliance with state law.

Responsibility: Land Use Services

Funding Source: General Fund

Timeframe: 2023~~2~~

Program 13~~2~~. Environmental Studies to Streamline Development

The County is currently preparing a series of technical studies on the issue of biological resources, cultural resources, hazards, and hydrology in key areas that align with areas of anticipated growth in the Policy Plan and Housing Element. These technical studies will streamline development by eliminating or focusing CEQA mitigation for those areas deemed most suitable for future development. This includes the areas of Bloomington, Phelan/Pinon Hills, unincorporated Apple Valley, and Helendale. These studies are slated for completion in 2022. Other areas suitable for growth (e.g., Mentone, unincorporated Fontana, and unincorporated Victorville) were already evaluated through the technical studies associated with the Countywide Plan EIR.

5. Housing Programs

Objective: Complete environmental studies to streamline future permitting and CEQA compliance.

Responsibility: Land Use Services

Funding Source: SB 2 Planning Grant, General Fund

Timeframe: 2022

Program 14~~3~~. SB 35 and SB 330 Streamlining

The County will update its Development Code to establish a written policy or procedure and other guidance as appropriate to specify streamlining approval process and standards for eligible projects as directed by legislation enacted through Senate Bill 35 (2017) and Senate Bill 330 (2019, inclusive of provisions enacted through Senate Bill 8 (2021)). Prior to the formal update, the County will regulate and permit projects in compliance with state law.

Objective: Update Development Code in compliance with state law.

Responsibility: Land Use Services

Funding Source: General Fund

Timeframe: 2022

Program 15~~4~~. Energy Conservation

The County will continue to promote energy conservation for residential uses and support local utilities in their efforts to provide public information and technical assistance to developers and homeowners regarding energy conservation measures and programs. On a regulatory level, the County will continue to enforce the State Energy Conservation Standards (Title 24, CA Administrative Code), and under the latest Building Code, continue to require that all (excluding exempt) new single-family homes and low-rise apartment buildings install solar panels or tap into community solar power, to compensate for all electricity used by the building (aka zero net energy homes).

The County will also continue encouraging the application of energy conservation to existing structures through efforts including weatherization programs and home energy audits, retrofit to dual components or piggyback the use of evaporative coolers with air conditioning systems, and installation or retrofitting of more efficient appliances and mechanical or solar energy systems. The Renewable Energy and Conservation Element contains specific goals and policies to ensure efficient consumption of energy and water, reduce greenhouse gas emissions, pursue the benefits of renewable energy, and responsibly manage its impacts on the county's environment, communities, and economy.

Objective: Continue to enforce state energy conservation and building code standards; coordinate with local utilities and Community Action Partnership to provide lower income households with utility assistance, home weatherization, and other energy conservation efforts

Responsibility: Land Use Services

Funding Source: General Fund

Timeframe: Ongoing

Program 16. Development Fee Transparency

The County already publishes its Development Code and its fee schedules online, with the fee schedules also available online in an interactive and searchable format. Pursuant to recent changes in state law (Assembly Bill 1483, 2019) that took effect in 2021, the County is required to make additional information available online, and to update all information within 30 days:

- Any other fees, exactions, and affordability requirements applicable to a potential housing development project that is not already available online, with the schedule presented in a way that clearly identifies the fees and requirements that apply to each parcel
- The current and five previous annual fee or financial reports
- An archive of impact fee nexus studies, cost of service studies, or equivalent, conducted by the County on or after January 1, 2018.

Objective: Update the County's website to ensure compliance with state law regarding increased fee transparency and online publication of information.

Responsibility: Land Use Services, Innovation and Technology Department

Funding Source: General Fund

Timeframe: 2023 and ongoing

5.2.4 IMPROVE THE CONDITION OF EXISTING AFFORDABLE HOUSING

Program 17~~5~~. Home Repair Assistance

Homeownership is a key goal of County policy makers, and maintaining that investment is critical to improve neighborhoods, reduce blight, and offer quality housing for residents and the workforce. The County has historically offered a number of housing repair programs. In past years, these programs have been cut back or discontinued due to the loss of redevelopment funds, cuts in state and federal funding, and the need to address other concerns related to foreclosures. Nonetheless, it is in the best interest of the County to reactivate these programs when feasible or to develop long-term relationships with mission-driven organizations to provide these types of services. As opportunities arise, the County will consider reactivating or establishing comparable programs related to single family rehabilitation, focused on seniors and/or lower income households.

Objective: Assist 50 units in need of minor or major rehabilitation, with a focus on ~~Monitor available state and federal housing funds suitable to fund a program(s) that helps~~ lower income and/or senior

homeowners conduct home repairs~~ (preference on multi-year funding over single year funding opportunity)~~.

Responsibility: Community Development and Housing

Funding Source: ~~Federal funds, as available~~CDBG, HOME, ESG, PHLA

Timeframe: Ongoing

Program 1~~8~~6. Code Enforcement

The County administers a wide variety of programs designed to protect the public~~'~~'s safety, welfare, and property value through enforcement of the San Bernardino County Ordinances and state/federal laws relating to land use, zoning, housing, public nuisances, and vehicle abatement in the unincorporated areas. This includes the Community Clean Up Program, which ~~took place in~~included 11 community clean up events throughout the county collecting a total of (2020/2021 figures) 120/170 tons of trash/bulky items, 80/73 tons of waste tires, and 8/12 tons of e-waste. The Proactive Community Enforcement (PACE) program has been successful in the past, but the County was unable to secure adequate funding to restart the program. The County will continue to conduct code enforcement and secure funds to facilitate the Community Clean Up Program and evaluate opportunities for similar programs.

Objective: Continue to conduct code enforcement programs and activities; monitor and secure funding for similar programs as determined appropriate and feasible.

Responsibility: Land Use Services

Funding Source: General Fund, other funds as available

Timeframe: Ongoing

Program 1~~9~~7. Units that are Abandoned or to be Demolished

The County will more closely evaluate the number of vacant units in the unincorporated areas and determine the number that are possibly abandoned or to be (or should be) demolished/condemned. Such properties are either unsafe or should be repaired or redeveloped to increase the quality and/or supply of housing stock. The County will reach out to the owners of such properties to communicate available funding resources to repair the residential unit(s) and/or the potential value of redeveloping the property by the owner or a potential buyer.

Objective: ~~Determine the number of vacant units in the unincorporated areas that are abandoned or to be (or should be) demolished/condemned using 2020 Census data, County records, and/or site visits. Reach out to~~Provide 10 property owners with information on potential funding sources for and benefits of repair or redevelopment.

Responsibility: Land Use Services

Funding Source: General Fund, other funds as available

Timeframe: ~~Identify number of units by 2023 and c~~Complete initial outreach by 2024 and annually as needed.

5.2.5 PRESERVE ASSISTED HOUSING AT RISK OF CONVERSION TO MARKET RATES

Program ~~18~~20. Assisted Housing

The County Community Development and Housing Agency has funded a significant number of income-restricted housing units throughout the county. This includes thousands of units funded over the years by federal funds and thousands of units under direct control of the County Housing Authority. In keeping with the County's approach to targeting affordable housing where the greatest housing needs exist relative to employment centers, the vast majority of affordable rental projects are in incorporated communities. The County has dedicated a significant amount of funding to preserve projects that might convert to non-low income uses and coordinates with incorporated jurisdictions on an as-needed basis. With the exception of 16 units in the Sunset Village Apartments in Joshua Tree, n~~N~~one of the assisted projects within the unincorporated county are at risk of converting to market rates prior to 2042. While the property owner has indicated an intent to extend affordability through the loan maturity date of 2037, there is an option to exit the program restrictions in 2026. The County will coordinate with the property owner to secure an extension through at least 2037, ideally obtaining resources to extend affordability for much longer or in perpetuity. The County will also ensure property owners are aware of its obligation to comply with the provisions of California Government Code Sections 65863.10 through 65863.13, including the provision of tenant resource information, notices of intent (3-year, 12-month, and 6-month), and the obligation to first provide an exclusive notice of opportunity to qualified entities prior to converting assisted units to market rates. Finally, the County will identify potential use of federal housing funds in its 2025-2030 Consolidated Plan.

Objective: 16 very low income units extended to at least 2037. Communicate with property owner by January 2023 regarding compliance (if appliable) with 3-year notice of intent and requirement to extend first offer to qualified entities. Identify potential use of funding sources by June 2024 to incorporate into the 2025-2030 Consolidated Plan. Additionally, m~~M~~onitor assisted housing countywide and coordinate with incorporated jurisdictions to prevent conversion to market rates.

Responsibility: Community Development and Housing, Housing Authority

Funding Source: General Fund for monitoring and communication with property owners; other funding sources to be determined based on availability and applicability (e.g., CDBG, HOME, Housing Choice Voucher (Section 8), USDA Section 515 and 521)

Timeframe: Ongoing

5.2.6 PROMOTE EQUAL HOUSING OPPORTUNITY

Program ~~19~~21. Affirmatively Further Fair Housing

5. Housing Programs

Guided by Assembly Bill 686 (2018), the County will develop a plan to affirmatively further fair housing efforts. The County acknowledges that significant disparities exist in housing need and opportunity and will work to promote equitable access for all persons protected by the California Fair Employment and Housing Act, persons identified by Section 65008, and applicable federal and state housing and planning laws. The County will, in accordance with California Government Code Section 8899.50, administer all of its programs and activities relating to housing and community development in a manner to affirmatively further fair housing and take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

The County will also develop and implement an Affirmatively Furthering Fair Housing Plan that incorporates the following actions that are also listed in Table 2-34 in the Assessment of Fair Housing. Relevant housing programs are listed in parentheses to further inform the nature of the actions and opportunities for parallel, complementary, and supportive activities.

Community education on affordable and fair housing. By 2022, the County will coordinate with other jurisdictions through SBCOG and the Inland Fair Housing and Mediation Board on a context-sensitive set of talking points and educational materials regarding the occupants, benefits, and myths of affordable housing, as well as fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint. The materials and outreach strategies should be finalized by 2023 with participating jurisdictions and the Inland Fair Housing and Mediation Board, followed by distribution and outreach work starting in 2024 and conducted on an ongoing basis.

Sewer expansion in Bloomington (see Program 2). The County will continue to expand infrastructure capacity in Bloomington to increase opportunity for new rental housing with good access to high paying jobs, transit, and other resources improved through other parallel activities such as IMP-2021-IU-2 in County Business Plan (see "Improving outcomes" action below). Coordination with the City of Rialto will take place by 2022 with the intention of completing a sewer service area agreement and funding mechanism to ensure sewer can be provided with new development in Bloomington by 2024.

Streamline ADUs to be affordable for lower income households (see Program 3). The County will coordinate with other jurisdictions through SBCOG on pre-approved site plans for ADUs (coordination in 2022 and identification of suitable site plans by 2023). The County will also evaluate fiscal impact of reducing or eliminating fees for ADUs that are reserved for lower income households and located in high or highest resource areas (evaluation completed by 2022, implementation of fee reductions/wavier by 2023).

Short-term rental housing (see Program 4). The County will conduct a public planning process to develop policies to limit the potential negative impacts of short-term, whole-home rentals on the availability of affordable long term rental housing. This study will be initiated in 2022, informed by public and stakeholder engagement completed by 2023, and concluded by 2024, followed by implementation of strategies based on the study's findings.

Improving educational, health, and wellness outcomes. Starting in 2022, the County will convene or augment existing annual meeting(s) of County department heads and other agencies/entities to identify strategies and opportunities to build the capacity of service providers/organizations and arrive at mutually beneficial outcomes given County goals and state/federal mandates. The County will prioritize low resource areas containing lower income housing sites, with a focus on improving educational, health, and wellness outcomes (see also the County Business Plan, IMP-2021-HW-2; and the following sections of the Policy Plan: the Hazards Element, Goal HZ-3 (Environmental Justice) and associated policies, and the Health & Wellness Element and all of its associated goals and policies, and the Transportation & Mobility Element, Policy 4.2, Complete streets improvements).

Objective: Improve the variety of housing types for rental and lower income households; reduce residential opposition that would prevent new housing development from being proposed and approved; improve educational, health, and wellness outcomes in low resource areas; and continue to contract with the Inland Fair Housing and Mediation Board to monitor, prevent, and resolve fair housing issues.

Responsibility: Community Development and Housing (others as indicated in related programs)

Funding Source: General Fund and other state and federal funds

Timeframe: Complete an Affirmatively Furthering Fair Housing Plan, including community and stakeholder engagement, by 2024; for other activities, see dates in the program description above (these are consistent with Table 2-34)

Program 22. Extremely Low Income Households

The County will continue to encourage the development of housing for extremely low-income households through a variety of activities such as outreach to housing developers on an annual basis, providing financial assistance (when feasible) or in-kind technical assistance, identifying grant and funding opportunities, applying, or supporting applications for funding on an ongoing basis, and reviewing and prioritizing local funding. The County will also identify, craft, and implement incentives, such as expedited processing, for individual housing units that are exclusively affordable (e.g., ADUs) and for housing developments reserve at least 20% of units for extremely low income households.

Objective: Permit an average of 20 units each year that are affordable to extremely low income households (in addition to objectives in other programs). Evaluate new options for incentives through interviews with developers of extremely low income housing and a review of programs from other jurisdictions in 2023, with the intent to prepare incentives in 2024 and implement incentives in 2025.

Responsibility: Land Use Services, Community Development and Housing

Funding Source: General Fund

Timeframe: Ongoing

Program 23. Households with Disabilities

The County will work with housing and service providers to ensure that special housing needs are addressed for persons with physical, psychological, and developmental disabilities. The County will interview developers and service providers to identify effective incentives, processes to streamline, and standards to modify to promote and facilitate the development of housing that helps those with disabilities live and function in a manner that is equitable when compared to those without disabilities. An example of streamlining may include the addition of more objective criteria for the major reasonable accommodation request to avoid referrals to the Planning Commission. An example of incentives may include the potential modification of the County's local density bonus provisions to lower the affordability threshold by a specific percentage when a proposed development will include permanent design features and/or permanent services that benefit those with disabilities. The County will also collaborate with developers and service providers on grant and funding opportunities, offering technical support and/or to serve as a supporting agency on applications for grants or funding.

Objective: 100 lower income units designed to serve those with disabilities. Collaborate with and interview housing developers and service providers in 2023 to identify potential incentives, streamlining, and standard modifications. Provide technical or other support throughout the planning period.

Responsibility: Land Use Services, Community Development and Housing

Funding Source: General Fund (for technical support and collaboration), other sources could include CDBG, HOME, and other federal and state grants

Timeframe: Ongoing

5.3 QUANTIFIED OBJECTIVES

Overall, the County's pipeline development, projected housing development, and capacity on vacant lands~~, and surplus capacity on underutilized parcels~~ are of sufficient number, zoning, and size to accommodate the potential growth for all income levels forecasted in the County's RHNA allocation. Additionally, special programs for housing assistance, rehabilitation, and preservation will help meet the County's existing and future housing needs during the 2021–2029 planning period. A summary of quantified objectives is provided in Table 5-2. Note that for new construction objectives, future projections of development and capacity are permitted by HCD to be grouped for extremely low, very low, and low income categories (collectively called "lower income").

State law allows the County to adopt quantified objectives for new construction that are different from the RHNA allocation. The County coordinated with the Southern California Association of Governments (SCAG) and communicated its ability to accommodate growth but emphasized the benefits (for the County, incorporated jurisdictions, and the SCAG region) of future growth occurring in incorporated jurisdictions compared to the unincorporated areas. This coordination occurred as part of the preparation of the Countywide Plan (adopted 2020), which was during SCAG's creation of the 2020 Regional Transportation Plan and prior to SCAG's crafting of its 2021-2029 RHNA allocation methodology. Specifically, the County communicated that substantial growth would only occur in a

number of unincorporated spheres of influence after land was annexed by the corresponding incorporated jurisdiction, with the primary example being the "Golden Triangle" area called out in the Town of Apple Valley's General Plan explicitly as a future annexation area. The County evaluated potential growth in this area in the Countywide Plan to better understand the implications for the provision of regional and safety services (economic development, public health, law and justice, sheriff, and fire protection (the latter two via contract)). The County's analysis found that regional and safety services, as well as commercial services, recreation facilities, transit systems, and employment opportunities are all more accessible and fiscally sustainable when housing is built in incorporated jurisdictions. This approach is also reflected in the following policies from the Land Use Element of the County Policy Plan:

- **Policy LU-1.1 Growth.** We support growth and development that is fiscally sustainable for the County. We accommodate growth in the unincorporated county when it benefits existing communities, provides a regional housing option for rural lifestyles, or supports the regional economy.
- **Policy LU-1.2 Infill development.** We prefer new development to take place on existing vacant and underutilized lots where public services and infrastructure are available.
- **Policy LU-1.3 Fiscal sustainability.** When determining fiscal impacts, we consider initial capital investments, long-term operations and maintenance, desired levels of service for public facilities and services, capital reserves for replacement, and impacts to existing uses in incorporated and unincorporated areas.
- **Policy LU-3.1 Annexation of unincorporated areas.** We support the annexation of unincorporated areas when it will result in a more effective and efficient provision of public services and a net fiscal benefit to the County.
- **Policy LU-3.4 Development project annexations.** When a property owner proposes annexation to facilitate new development adjacent to an unincorporated residential area, we prefer that the annexation includes the adjacent residential area.

At nearly the same time that the County was adopting the Countywide Plan (and after related technical studies were already completed), the Town of Apple Valley annexed roughly 1,365 acres of the 2,775-acre Golden Triangle area, with the Local Agency Formation Commission (LAFCO) recommending that the Town continue to work with property owners to annex the remainder of the Golden Triangle at a future date (to resolve and avoid the creation of a totally surrounded unincorporated island). This Golden Triangle represents roughly one-third (32%) of the County's projected buildout, but no RHNA transfer took place during the annexation approval process.

While the County recommended that SCAG prepare a RHNA methodology that promotes housing construction almost exclusively in the incorporated jurisdictions and reflect future growth in areas like the Golden Triangle only after annexation, the County's RHNA allocation still reflects a substantial amount of new housing due to new growth (roughly 6,000 for new growth and 2,800 for pent up existing

demand). The Town of Apple Valley's RHNA allocation is almost completely (95%) new growth, which is consistent with growth potential in the Golden Triangle area (which represents almost half (48%) of the Town's future growth capacity according to its General Plan, after accounting for growth that has taken place within incorporated boundaries through 2019 when the annexation was approved).

Accordingly, the County set its objectives for new construction during the 2021-2029 planning period based on a combination of pipeline development, construction trends as measured over the past four years (2018-2021, consistent with figures reported in APRs), and what would have been the County's RHNA allocation if growth projections were consistent with estimated figures communicated to SCAG in 2018 for the 2020-2030 time period as well as the annexation (approved and balance recommended by LAFCO) of the Golden Triangle Area in Apply Valley.

The quantified objective for Program 1 also includes maintaining capacity on vacant land to facilitate the development of the County's remaining RHNA allocation for housing units affordable to lower income households. However, this figure is independent of the quantified objectives for new construction and is therefore not counted in the totals. A final note worth highlighting is that, with the exception of Program 10's objectives to assist those experiencing homelessness, the quantified objectives shown in Table 5-2 are exclusively for the unincorporated areas. However, the County Community Development and Housing Agency also obtains and allocates federal and state dollars and County resources to incorporated jurisdictions for the purposes of building new affordable housing units, rehabilitating existing housing units, and preserving existing affordable housing. Figures associated with the County's housing activities in incorporated jurisdictions can be found in the County's Consolidated Plan.

Table 5-2 Quantified Objectives by Income Category

~~Activity/~~Program Activity	Extremely Low[1]	Very Low	Low	Moderate	Above Moderate	Total
New Construction[2]						
~~Pipeline Development~~	~~-~~	~~146~~	~~451~~	~~1,398~~	~~1,671~~	~~3,666~~
~~Rural Single Family~~	~~260~~			~~355~~	~~898~~	~~1,513~~
~~ADUs~~	~~295~~			~~179~~	~~39~~	~~513~~
~~Manufactured Homes~~	~~104~~			~~149~~	~~17~~	~~270~~
~~Rural Single Family~~	~~260~~			~~355~~	~~898~~	~~1,513~~
1. Vacant Land[2,3]	~~2,285~~720			-1,196	~~1,~~2,002~~145~~	~~3,~~3,918~~430~~
~~Underutilized Land~~[3]	~~394~~			~~-~~	~~-~~	~~394~~
Pipeline Development	-	82	324	1,196	1,382	2,984
Rural Single Family	-			-	620	620
Manufactured Homes	314			-	-	314
Additional capacity maintained on vacant land[4]	*2,144*			-	-	*2,144*
~~1. 1.~~ 3. ADUs[5]	217			-	-	217
TOTAL	**~~9373~~,935**			**~~2,081~~1,196**	**~~3,770~~2,002**	**~~9,74~~,135~~86~~**
Rehabilitation						

Table 5-2 Quantified Objectives by Income Category

~~Activity/~~Program Activity	Extremely Low[1]	Very Low	Low	Moderate	Above Moderate	Total
~~None with quantified objectives~~17. Home Repair Assistance	30			-15	-5	50
19. Units – Abandoned/Demo	10			-	-	10
Assistance, Conservation, or Preservation						
7. Acquire/Const of MF Units ~~4~~6	~~16~~66			-	-	~~16~~66
10. Homeless Strategic Plan						
System & Policy Change	500 people			-	-	500
Prevention & Housing	1,800 people			-	-	1,800
Healthy & Safe Conditions	100 beds			-	-	100
Coord Data & Training	Utilization Rate from 88 to 95%			-	-	95%
20. Assisted Housing	-	16	-	-	-	16
Affirmatively Furthering Fair Housing~~7~~						
3./21. Accessory Dwelling Units	100	79	38	-	-	217
22. ELI Households	160	-	-	-	-	160
~~3~~23. ~~Accessory Dwelling Units~~Households with Disabilities	~~95~~	~~95~~100	~~96~~	-	-	~~286~~100

Notes:
1. While the RHNA methodology and allocation does not provide a figure for extremely low income households, state law directs the County to address the existing and future housing need for extremely low-income households. The projected f~~F~~uture need can be estimated at one-half of the County's very low-income RHNA allocation or 1,090).
2. Future projections of development and capacity are permitted by HCD to be grouped for extremely low, very low, and low income categories (collectively called "lower income").~~2. No capacity is listed for moderate due to surplus capacity from the combined pipeline development and projected housing development.~~

~~3. No capacity is listed for moderate or above moderate due to surplus capacity from the combined pipeline development, projected housing development, and capacity on vacant land.~~3. State law allows the County to adopt quantified objectives for actual construction that are different from the RHNA allocation. The County sets objectives for new construction based on a number of factors, as described in the narrative preceding the table.
4. The quantified objective for Program 1 also includes maintaining capacity on vacant land to facilitate the development of the County's remaining RHNA allocation for housing units affordable to lower income households. However, this figure is independent of from the quantified objectives for new construction and is therefore not counted in the totals).
5. This figure is in addition to pipeline development and is in addition to historic construction trends to reflect the County's desire to facilitate more affordable housing through ADUs, particularly in the Valley region.
~~6~~4. Through Program 7, the County will seek funding to expand the number of units assisted.
7. These units are incorporated into the objectives for new construction (i.e., not in addition to), and may be produced through other means (e.g., conversion of existing uses) that do not grant the County RHNA credit for new construction (subject to statutory requirements for timing and nature of the existing use).