Review Submission

Review the content of your AFH before completing the certification and submission to HUD.

Cover

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Executive Summary

1 Instructions

II.1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Revised (Click for previous text)

The Town of Apple Valley was incorporated in 1988 and consists of 78 square miles. The City of Victorville was incorporated in 1962 and encompasses 74 square miles. Since 1997, both cities have received an annual allocations of Community Development Block Grant (CDBG) funds from the U. S. Department of Housing and Urban Development (HUD).

In 2003, the Town of Apple Valley and City formed the HOME Investment Partnership Program Consortium (the "HOME Consortium") in order to meet the threshold of obtaining HOME entitlement status with HUD. Both the City and the Town receive CDBG and HOME funding annually. For the purpose of this Assessment to Fair Housing (AFH) plan, the Town of Apple Valley and the City of Victorville may be collectively referenced as "Communities" and "Jurisdictions".

As Entitlement Jurisdictions, both the City and Town are required to prepare and adopt a Consolidated Plan (Con Plan) and an AFH plan. The AFH replaces the Analysis of Impediments to Fair Housing (AI) to assist the Communities in identifying fair housing issues and related contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. The Con Plan and AFH are also required to have a strategy for resident and citizen participation in the planning process. According to 24 CFR § 91.105 and as a condition of federal funding, the Communities must adopt and follow a Citizen Participation Plan (CPP) describing how the City will encourage participation from residents and citizens of all ages, genders, economic levels, races, ethnicities and special needs to provide them with equal access in the development of the Con Plan, Annual Action Plan (AP) and AFH, and to ensure their issues and concerns are adequately addressed. Prior to the development of the AFH, the Consortium is required to amend its Citizen Participation Plan (CPP) to incorporate the legal requirement that federal grantees shall affirmatively further fair housing by "taking meaningful actions" in addition to combating discrimination to overcome patters of segregation and integrating racially and ethnically concentrated areas of poverty into the areas of opportunity, and addressing disparities in housing needs by providing access to opportunities. Both Communities amended their respective CPP's. Below summarizes fair housing issues, significant contributing factors, and goals. Also included is an overview of the process and analysis used to reach the goals.

Fair Housing Issues:

1. Racially or ethnically concentrated areas of poverty (R/ECAPs) in the jurisdiction and region:

Racially or Ethnically Concentrated Area of Poverty, R/ECAP, means a geographic area with significant concentrations of poverty and minority populations. The rule does not define "significant" or give metrics. However, the proto-type mapping system demonstrated by HUD suggests that R/ECAPs will be outlined on maps and provided in data tables. The R/ECAP only includes Census Tracts 99.05 which is within Victorville's geographical boundaries.

2. Segregation:

- The data show that Victorville has accommodated the majority of the Consortium's population growth, and Victorville is providing a broader range of housing choices. This appears to be a major factor contributing to the existing pattern of segregation between the two jurisdictions and, given the demographic shifts in the county and region over the past couple decades, it seems likely to become exacerbated if the current situation doesn't change (Location and type of affordable housing- Contributing Factor).
- The AFFH data show that Between 1990 and the present, Victorville has accommodated 73% of the Consortium's population growth. During that same time, Victorville has accommodated even higher shares of certain protected class groups in the Consortium, including:

- 77% of black population growth in the Consortium
- 75% of Hispanic population growth in the Consortium
- 83% of foreign-born population growth in the Consortium
- 85% of LEP population growth in the Consortium
- 86% of Consortium's growth in the number of households with children
- RHNA production over the previous Housing Element cycle shows that Victorville did a much better job expanding housing supply. During the previous cycle, Victorville's allocation was over half of the Consortium's, and produced over 80% of the units in its allocation. Apple Valley met 50% of its much smaller target. 85% of the multifamily housing added to the Consortium during that time was built in Victorville as well, which is a significant reason why Victorville is home to over 60% of renters in the Consortium, and over 70% of HCV-assisted households (Location and type of affordable housing- contributing factor).
- Zoning has traditionally been focused towards lower density residential uses in Apple Valley. The jurisdiction was founded on the basis of rural single-family residential and estate sized lots. The glorification of ranch-style living has been a recurrent theme in Apple Valley's history and has carried over to the present day via minimum half acre lot sizes throughout the jurisdiction. However, when compared to the region, affordability for both rents and home ownership is considerably lower in Apple Valley than most all areas in the most southern parts of the two-county region and prices are comparative with our local neighbors, Hesperia and Victorville, who have more desirable access and proximity to Interstate-15. The Town of Apple Valley has an approved Housing Element that provides for enough variety in land uses to accommodate housing units across all levels of density and affordability.
- Since we see that population growth in the region overall is increasingly comprised of minority ethnic groups and other protected
 classes, it is no surprise that accommodating population growth will lead to more diversity. We also expect to see growth in parts of
 the population that, in the Inland Empire, are more likely to rent and disproportionately earn lower incomes. If these trends in
 housing supply don't change, the racial/ethnic divide between the cities seems likely to deepen. The Consortia is committed studying
 the issue & impact of public policy relating to the barriers to certain households in AV. (Land Use and Zoning Laws- Contributing
 Factor)
 - 3. Significant disparities in access to opportunities:

Significant disparities in access to opportunities means substantial and measurable differences in access to education, transportation, economic, and other important opportunities in a community, based on protected class related to housing. When compared to other Race/Ethnic groups, Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within the Consortia. Of the opportunities measured, Hispanics were indexed the lowest on average of the seven measured categories (Lack of public investments in specific neighborhoods, including services or amenities- Contributing Factor).

Significant contributing factors:

- Lack Community Revitalization Strategies
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing
- Evidence of illegal discrimination or violations of civil rights laws, regulations, or guidance.

Goals and analysis used to reach the goals

Goal #1: Improve the housing condition and access to social services within the Consortia's R/ECAP (Racially or Ethnically Concentrated Areas of Poverty)

Process and Analysis: The Consortia reviewed AFH provided data and maps, as well as reviewed citizen comments and other relevant data and plans, As indicated by the analysis, several housing units and neighborhoods in this area are older construction, and require either rehabilitation or conservation to be maintained as viable dwelling units. Within these neighborhoods, Hispanics experienced highest

rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the Consortia.

The poverty rate of this area which disproportionately effects Hispanics also necessitates a high priority. The Consortia will use CDBG funding to fund social service agencies and programs to assist in reducing the poverty level of residents within the R/ECAP.

<u>Goal #2:</u> Continue to provide fair housing services within the consortia with an emphasis on reducing the number of fair housing complaints based on disability.

Process and Analysis: Lack of local private fair housing outreach and enforcement as well as private discrimination are a contributing factor of high priority because of its significant effect on fair housing choice for all protected groups. In reviewing fair housing data from the Inland Fair Housing and Mediation Board, fair housing complaints by individuals with a disability seem to be disproportionately higher than other protected groups.

Goal #3 : Increase levels of integration by Hispanic residents within higher opportunity neighborhoods.

Process and Analysis: According to AFH maps used in the analysis, from 1990 to 2000, the Consortia's Racial/ Ethnic demographics were primarily Whites and Hispanics, and integrated. However, from 2000 to 2010, a clear lack of integration by Hispanics in the Consortia's eastern and higher opportunity neighborhoods existed.

Lack of integration was a pattern that took shape over a decade long period. The Consortia understands that achieving significant results will require prolong efforts (i.e., mobility programs, land use assessments, etc.) beyond the 5-year planning period.

Community Participation Process

1 Instructions

III.1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

1 Instructions

<u>Consortium.</u> As a part of the CPP, the Consortium encouraged participation to include community-based and regionally-based organizations that represent and assist protected class members and organizations that enforce fair housing laws. The Consortium also consulted with local fair housing enforcement agencies, fair housing organizations and other nonprofit organizations that receive

funding under the Fair Housing Initiative Program, and other public and private fair housing service agencies that operate within the City's jurisdiction.

For the preparation of this AFH, the Apple Valley/Victorville HOME Consortium, utilized their respective websites, social media accounts such as Facebook, Twitter, LinkedIn and Instagram accounts, to announce and advertise community meetings, surveys and public meetings and hearings. The Town of Apple Valley has been able to secure a strong response rate in the past considering the Town's Facebook account has a following of over 10,000 strong; approximately 1/7th of Apple Valley's population 70,000 residents.

The AFH surveys, as well as the invitation to the workshops, were also emailed to approximately 1,200 community and regional contacts in hopes of gleaning their interest in attending one of the meetings and asking them to spread the word within their own organizations and share the survey with those they serve. Stakeholder organizations received a specific survey to further assist the Consortium in obtaining additional local or regional data and knowledge.

The ability to provide ease of access to the survey was important to the Consortium. Both Jurisdictions, in the capacity of the Consortium, made the survey available online via Survey Monkey between June 29, 2016 and August 1, 2016, in both English and Spanish. Hard copy surveys and flyers, also in both languages, advertising both the online survey as well as the community meetings were distributed to the Town of Apple Valley and City of Victorville office locations, and the San Bernardino County Apple Valley Branch Library. Hard copy surveys were also made available to the public at community events and meetings, a homebuyer's workshop, and a fair housing disability workshop that staff attended during the time frame that AFH input from the public was sought. Additionally, approximately 200 hard copy surveys were mailed to former loan and grant recipients of Victorville Housing Programs. The surveys were also provided to Victorville residents and business owners who attended an Old Town Revitalization Forum meeting. This combined effort generated a total of 121 community respondents.

Community outreach meetings specific to the AFH were also held. In addition to being translated in both English and Spanish, flyers also acknowledged that if accommodations were needed to attend the meeting to inform staff of either jurisdiction of those needs. The first meeting occurred on July 12, 2016 at 1:00 PM in the Town of Apple Valley Council Chambers located at 14955 Dale Evans Pkwy., Apple Valley, CA 92307. The second was held at the City of Victorville offices at 14343 Civic Dr., Victorville, CA 92392 at 6:00 PM. These were not especially well attended, but the several community members present at each were very responsive and involved in the guestions posed to them about their communities.

Stakeholder meetings were held at City of Victorville offices on August 9, 2016 at 10:00 AM to noon and 2:00 PM to 4:00 PM for those involved with transitional housing and rental assistance, and real estate and lending industries, respectively. With staff present from both Victorville and Apple Valley, a short questionnaire was disseminated to attendees who provided insight from the perspective of their organizations and professions. Another stakeholder meeting was hosted on August 11, 2016 at 10:00 AM by the City of Victorville, to focus topic questions regarding education and youth.

III.2. Provide a list of organizations consulted during the community participation process.

1 Instructions

The stakeholder meetings were broken up into three meetings, each addressing a different group or service provider type. One meeting was for utility assistance and transitional housing providers, another meeting included realtors, lenders and fair housing providers. Lastly, the third meeting focused on education and youth services. For the stakeholder meetings, invitations were emailed and calls were made to the following organizations:

- · Court Appointed Special Advocates of San Bernardino County
- · High Desert Transitional Living
- No Drugs America Association
- Olive Crest Foster Family
- · Options for Youth
- · Catholic Charities
- · High Desert Homeless Services
- Knowledge and Education for Your Success
- Orenda Foundation
- · Patient Care Systems
- · Samaritan's Helping Hand
- · St. John of God Health Care Services
- · Victor Valley Community Services Council
- Victor Valley Rescue Mission
- Katherine Santifer Realty
- SPS Realty Group
- · Berkshire Hathway Home Services
- · Sunset Breeze Real Estate
- · HomeStrong USA
- · Neighborhood Partnership Housing Services, Inc.
- · Neighborhood Housing Services of the Inland Empire
- · High Desert Association of Realtors
- · Inland Fair Housing and Mediation Board
- · Legal Aid Society of San Bernardino
- Moses House Ministries
- · San Bernardino Sexual Assault Services
- Victor Valley Domestic Violence
- · San Bernardino County, Economic Development and Housing
- Volsch Enterprises, Real Estate Broker
- · City of Hesperia
- Housing Authority, San Bernardino County
- St. Joseph Health, St. Mary's Hospital
- Oak Hills Realty
- · Hamilton Landon, Realtor
- High Desert Association of Realtors
- · Rock Springs Residential Care
- · Apple Valley Senior Center

III.3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.



Consortium. Low participation was problematic at AFH community meetings. A lack of involvement from the community to attend meetings, outside of regular council meetings, has always been an issue for the Jurisdictions. To accommodate the needs for attendees, meetings were held at various locations and times of day, including the evening hours. This did not prove to be any more successful than the daytime meeting. Some of the reasons for not being able to attend any of the meetings by agencies/nonprofits included having limited staff, conflicting meetings and commencement of new fiscal year or program year.

Although attendance was low, key community stakeholders were in attendance and gave vast input in the community needs and discrimination faced by protected classes. Between circulating AFH surveys at other community events and online, utilizing social media, sending email blasts to community members and organizations, direct mailings, and phone interviews, a wide-breadth of information and input deemed our multi-channel efforts a great success overall.

III.4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

1 Instructions

In reviewing the comments received at these meetings, the following key issues were identified:

Community Workshops Summary. Two community meetings were held in July 2016 – Apple Valley (July 12th early afternoon) and Victorville (July 13th evening). The community meetings were held to glean local input and knowledge from residents of the respective Jurisdictions, including fair housing issues and concerns. Each community meeting was structured in the same format: participants were introduced to the Con Plan and AFH (AFH) plan process through a presentation and then asked to discuss a series of questions related to housing and community development needs, their presumptions regarding areas considered segregated and/or challenged by poverty, including fair housing issues and concerns.

Community Survey Summaries. In addition to the meetings, a Fair Housing Survey was also created. A thirty question survey was disseminated through multi-channel methods to seek responses from members of the public who may be harder to reach by methods of face-to-face contact at events in the community or were possibly not interested in attending a community meeting. The Fair Housing Survey sought to gain knowledge about the nature and extent of fair housing issues experienced by Apple Valley and Victorville residents as well as their opinions concerning the existence, or lack of, racially/ethnically concentrated areas of poverty, or areas deemed as disadvantaged within the Jurisdictions. The survey questions were also designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in his/her neighborhood. The survey and flyers were available in English and Spanish, and distributed via the following methods:

- Survey made available in online format via survey monkey.
- Online survey link posted to Apple Valley Facebook and Twitter accounts.
- · Hard copy information flyers and surveys placed at various community locations and public counters.
- Posted on the municipal websites of both Apple Valley and Victorville.
- Solicited the participation of service providers and stakeholders via mass emails to also make the survey flyer, with survey web
 address and information on the community meetings, available in their offices and to distribute the information to their clients and
 other members of the community they felt would be receptive and responsive.

• Surveys were solicited at a Homebuyers Resource Fair that was held on Saturday, June 4, 2016 at the San Bernardino County Fairgrounds. This event was in partnership between the High Desert Association of REALTORS® and First District Supervisor, Robert A Lovingood, County of San Bernardino.

Stakeholder Meetings Summary. Three stakeholder meetings were held in August 2016 – all in Victorville, with staff from both Jurisdictions present. The stakeholder meetings were also held to discuss priority housing and community development needs in the respective Jurisdictions, including fair housing issues and concerns. Each stakeholder workshop was structured in the same format: participants were introduced to the AFH plan process by staff and then asked to discuss a series of questions related to housing and community development needs, including fair housing issues and concerns.

A comprehensive summary of housing-related issues identified by submitted surveys, community meetings, and workshops held, is found below.

Homelessness. Homelessness was one of the primary issues discussed by participants at the Victorville meeting. Participants noted the lack of Homeless Shelters in the High Desert. There is just one in Victorville that serves a sphere of influence of approximately 500,000 residents. The High Desert is subject to extreme temperatures that can result in dangerous conditions for homeless persons. Most homeless services are located "down the hill" in the City of San Bernardino, or other southern jurisdictions, creating a disparity in services available between the High Desert and the surrounding region.

Affordable Housing, Senior Housing, Reasonable Accommodation for Disabled Persons and Youth. Though segregation was not identified as an issue through various means of community contact, housing in general was still identified as a major need discussed by participants at the meetings. Community members were primarily concerned about housing affordability and availability for seniors, the disabled and youth. Participants discussed the housing needs of seniors with limited income, and the condition of existing housing; in particular about existing unmaintained rental apartments. A stakeholder noted that location of the most affordable housing has that to offer, but very little, in terms of amenities, are available within walking distance to some of the poorest neighborhoods in the High Desert. Access to transit, grocery stores, recreation services and safety were expressed as some of the services or opportunities that people must give up in order to live in an area that is affordable enough for their household.

Neighborhoods. Participants stated the importance of crime-free, safe neighborhoods. The importance of maintaining a safe, well-maintained community was emphasized at the meetings. If a community is safe and there are places for people to go (commercial and community-based), then residents will tend to remain in the community instead of seeking a way out. Non-reporting of crime was noted on several occasions as a barrier to an undesirable neighborhood being able to rebound. Whether actual or perceived fear of retaliation prevents crime reporting, the effects can be detrimental to a neighborhood if it becomes known for unresolved crime activity.

Transportation. Many participants expressed their concerns as to the lack of transportation available throughout the High Desert. Participants communicated how many low-income families and people in the Town of Apple Valley and City of Victorville areas struggle to find reliable transportation. The result is missed appointments and poor illness management, even when care is readily available. Some households don't have a vehicle, or share one among multiple family members, and for those who are disabled, obese, or chronically ill, riding the bus can be a difficult undertaking. As a result, some people may find themselves without a way home after an emergency trip to the hospital; miss opportunities to schools, family or community events or simply miss a doctor's appointment because they don't have a way to get there.

During the community participation process all comments and views were considered and have been incorporated into this AFH. No comments were considered as immaterial or insignificant.

Economic Development - Lack of sufficient local employment in career level employment sectors continues to be an impediment to the local community and economy.

Education - Lack of an educated work force continues to be an impediment to business attraction and employment opportunities.

Assessment of Past Goals, Actions and Strategies

IV.1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

IV.1.a. Discuss what progress has been made toward their achievement.

Instructions

During the last Analysis of Impediments to Fair Housing Choice (AI), both Communities experienced similar impediments that continued to impact the Apple Valley/Victorville Consortium areas. The impediments and strategies on how to reduce their impacts, and accomplishments are listed below:

Housing discrimination towards disability, race, and familial status has been a reoccurring issue for both communities. As a continued service, both communities elected to continue contract services with Inland Fair Housing and Mediation Board (IFHMB). IFHMB assist both Jurisdictions in providing fair housing services to residents, landlords, and other housing professionals. Available services, newsletters, and special event flyers are routinely posted on each respective Jurisdiction's website. In addition, both the Town and the City assisted in promoting special events by distributing informational pamphlets and flyers throughout public-owned buildings. Recently, July 2016, the City of Victorville hosted and participated in a special workshop held by IFHMB to educate and assist tenants, property owners and other housing professionals on fair housing issues specifically for persons with disabilities. Discussion involved fair housing laws, introduction to the affirmatively furthering fair housing final ruling and requirements, reasonable accommodations or modification request allowable fees associated with reasonable accommodation or modification request. The Consortium anticipates it will continue its participation in supporting special events held by IFHMB on a continual basis. This event was highly successful, many interested persons, property owners and tenants attended. Persons who attended expressed their gratitude to the City for hosting the event. Their questions and concerns were addressed and real estate professionals felt they were more educated on how to assist persons with disabilities, particularly in providing reasonable accommodations.

Accordingly, both communities provide CDBG funding to IFHMB to provide its residents with fair housing and landlord tenant mediation service and assistance. Along with these services, IFHMB assist City of Victorville with its first-time homebuyer program, Mortgage Assistance Program (MA) by providing homebuyer education and certification. Persons who receive their homebuyer education course by IFHMB receive information and training in the complete process of purchasing a home, budgeting, credit, mortgage loans, and how to keep your home. On behalf of the communities, IFHMB distributes fair housing materials, holds workshops on fair housing throughout the High Desert and San Bernardino County. IFHMB's services have assisted an array of residents within the Communities.

Many of which have received 'one-on-one' assistance in assisting homeowners who are at risk of losing their home by exploring many available options including loan modification, special forbearance, partial claims, loan repayment plans, loan reinstate plans, short sale options including the Homeowner Assistance Foreclosure Alternative (HAFA), and the Homeowner Assistance Refinance Program.

In addition to the above accomplishments, the communities supported and actively promoted the National Fair Housing Month held in April of each year. The City of Victorville posted HUD created posters and flyers throughout city hall, city website and social media outlets celebrating the National Fair Housing month.

<u>Public Outreach</u> is a concern that needs to be address by both communities. Many residents, landlords and tenants are not aware of fair housing rights and services available. When encountered with fair housing issues, many do not believe reporting the incidents would help the situation. Some are also afraid of retaliation by the landlord. With this in mind, some of the strategies both Communities adopted is to (1) provide fair housing outreach and education services that will include, but not be limited to at least one of the following components: press releases, public service announcements, cable TV, radio, and newspaper outreach, updates in newsletters and/or other publications, events at the annual fair housing celebration, organized meetings or events relating to fair housing, and participation in community events such as fairs and trade shows; (2) initiate half-day fair housing workshops at Town Hall and City Hall annually, targeting residents, landlords, disadvantaged groups, and housing professionals; (3) outreach and education specifically for housing providers (i.e., landlords, property managers, realtors, lending institutions, and managers of public housing); (4) workshops to assist elected and appointed officials of each jurisdiction; and the general public. In addition, publicizing outcomes of fair housing lawsuits to encourage reporting of fair housing issues by residents and coordinate with minority Chambers of Commerce to promote Town programs and services are also objectives both communities anticipate launching. The City of Victorville also utilizes its Cityowned electronic message board located on the east-side of Interstate-15 to make public service announcements (PSA). The City recently approved a message for the High Desert Crime Prevention & Neighborhood Watch Program event that will held at City Hall on August 24th. The City routinely promotes PSA for non-profits, such as the High Desert Association of Realtors® and special County of San Bernardino events, etc.

Housing Choice Vouchers and Affordable Housing Units are limited resources to Hispanic households. Because many residents have been on the Housing Authority of County of San Bernardino's (HACSB) waiting lists for choice vouchers for several years in hopes of qualifying for the Housing Choice Voucher program, HACSB has closed its ability to provide additional vouchers to new households who may reflect the current demographic profile of the County and communities within the Consortium.

Although these choice voucher resources are limited, HACSB provides other affordable housing opportunities through other affordable housing developments it maintains. Currently, HACSB has an open waiting list. Additionally, the City of Victorville also provides financial assistance to facilitate the construction of affordable housing. These affordable housing complexes are privately owned, but contain affordable housing covenants to secure housing for very-low and low income households for several years. In support of HACSB's efforts, both communities will continue efforts in petitioning for additional voucher assistance from HUD. As the Consortium, the Town and City promote any and all available resources to households in need. When opportunities arise, both Jurisdictions attempt to require rental property owners receiving financial assistance from the City or Town to affirm their commitment to comply with fair housing laws, and attend fair housing training.

Housing for Persons with Disabilities. Accessible housing units and other housing options (such as transitional and supportive housing) for persons with disabilities are limited in supply. In a recent study carried out by IFHMB, the majority of discrimination indicated this issue increase. In past Al's, both communities have amended their respective Zoning Code's to establish either a (1) Reasonable Accommodation procedure, or (2) address the transitional housing and supportive housing provision according to State Housing Element Law. Both Communities anticipate it will increase its efforts in awareness and training to further assist persons with disabilities with fair housing rights. Additionally, IFHMB has assisted residents living within the Consortium with fair housing mediation services concerning reasonable accommodations.

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

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

Among the top lenders, minority households also have high fallout rates (not completing or withdrawing an application). Some actions adopted by the Communities since the last Al are; (1) work with government agencies and nonprofit groups that provide credit counseling and foreclosure workshops to conduct workshops in the High Desert area; (2) conduct lender workshops to provide outreach, education and encourage increasing pool of lenders participating in the down payment assistance programs; (3) continue contract services with IFHMB to monitor lending activities and contact lenders to address potential issues; (4) publicize results of Home Mortgage Disclosure Act (HMDA) data review to bring attention to the lending community, housing advocates, and the general public; (5) continue coordinating efforts with minority Chambers of Commerce to promote Town, City and County programs and services, including home buying down payment assistance, credit counseling, foreclosure counseling, etc. The City of Victorville has recently met with real estate professionals in strategizing its marketing efforts to promote its Mortgage Assistance Program (MAP), Senior Home Repair (SHRP) and Owner-occupied Rehabilitation (OOR) Programs. Additionally, the City of Victorville has met with Lenders to conduct "one-on-one" training to ensure their knowledge of the City's MAP is accurate and lending opportunities are given to all persons equally and fairly. The City anticipates it will launch a large Lender-Real estate professional training workshop in November 2016 to promote equal opportunity to home ownership among the very-low, low and moderate income households. The City anticipates in concentrating its efforts to the Old Town Area where home ownership is low among minorities.

<u>Public Transportation System</u> throughout the High Desert Area, including areas of the Consortium, is limited. Many lower income households, seniors and persons with disabilities have many opportunities to housing resources offered and funded by the County of San Bernardino however, access difficulties arise as they are dependent on the public transportation system. Many of these residents find that the public transportation system in the High Desert is difficult to navigate through and use. Therefore, the Consortium has made many efforts to expand public transportation by (1) petitioning to the County of San Bernardino to expand housing programs and services to the High Desert area vs. "down the hill"; (2) provide public transportation maps at public locations (currently, maps of transportation routes are available at City Hall); and (3) include navigating the public transportation system in programs and activities designed for seniors and disabled.

Foreclosures. Both Apple Valley and Victorville are impacted by the large number of foreclosures. Abandoned and foreclosed homes are often vandalized and trespassed, negatively impacting neighborhood safety and conditions. The lack of maintenance of foreclosed properties is a serious issue expressed by many participants of public meetings conducted as part of this Al. Goals and actions proposed and carried out by both communities includes: (1) continue proactive code enforcement activities to address issues associated with abandoned and foreclosed homes; and (2) work with lenders holding the homes to ensure a reasonable level of safety and condition is maintained.

Real Estate Advertising. Previous Al indicated that advertising of for-sale homes and particularly rental listings contained potentially discriminatory language. Often such language encourages or discourages a particular group to inquire about the housing available.

Given the market condition, many homes are being used as rentals. Owners of these units may not be professional landlords and therefore are not familiar with fair housing rights and responsibilities. Some actions taken by the Consortium includes: (1) continued contract services with IFHMB to monitor the advertising of for-sale and for-rent units; and (2) publicize fair housing rights and

responsibilities on Town and City websites, newsletters, or other publications as a way of outreaching to landlords new to the rental business.

Accessibility of Public Facilities. Not all public buildings are accessible to persons with disabilities. Accessible sidewalks with ramps and curb cuts are also needed to allow circulation from one location to another. The Consortium is working on improving accessibility in and to public buildings to facilitate participation in civic decisions by persons with disabilities. Annual evaluations of accessibility improvement needs of public facilities through the Capital Improvement Plan process to identify priority projects for funding have been started.

In October 2015, the City of Victorville City Council approved a Voluntary Compliance Agreement with HUD requiring a Self-Evaluation and Transition Plan that will identify ADA compliance barriers in City programs, activities and facilities. In addition, the Plan would provide with a timeline for completion of modifications to provide equal access. The deadline for the completion of the review and update is 240 days upon execution of the Voluntary Compliance Agreement. The May 2016 deadline has been extended to January 30, 2017. The City has acquired the assistance of a firm, Disability Access Consultants (DAC) to assist with the Self-Evaluation and Transition Plan. Additionally, the City is working with Caltrans in developing an ADA Transition plan for facilities in the public right of way to be eligible to receive federal transportation funds. This plan is currently underway.

IV.1.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and

The Town of Apple Valley, City of Victorville and fair housing service providers have successfully implemented ongoing consultation, education and workshops for the community. Affirmatively furthering fair housing continues to be a priority though recent community surveys have reflected less concern in relation to other priorities than in years past. Past goals and issues are starting points for current and future goals and strategies and included in surveys, questionnaires and community meetings to develop dialogue identify current concerns and plan strategies to be implemented in consolidated plan and annual action plans. The Housing Authority, County of San Bernardino administers affordable housing units in the Victor Valley which includes Apple Valley and Victorville. Affordable units are limited to funding, yet the area is generally more affordable at market rates than the regional area. Accessibility to public facilities remains a high priority and improvements continue as funding becomes available.

The City of Victorville has achieved many successes in assisting and maintaining affordable housing to its senior and permanently disabled population. Programs offered by the City, such as the Senior Home Repair (SHRP) and Owner-Occupied Rehabilitation (OOR) Programs, and the Town of Apple Valley's OOR Program has provided residents with opportunities to make eligible repairs to their homes. Many repairs include ADA, health and safety improvements. These residents normally do not have the financial means to make these repairs on their own; therefore, these programs remain in high demand. Both Communities anticipate continuing to fund these programs in future years. Additionally, the City is in the process of expanding its programs that will help unrepresented protected classes, such as disabled persons, that are low and very-low income, make necessary repairs and improvements.

IV.1.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.



In future AFH processes, efforts will be made to collaborate with public agencies and housing authorities that share the regional area of influence, to include the County of San Bernardino, Housing Authority of San Bernardino County and the City of Hesperia. As first submitters, the Town of Apple Valley and City of Victorville were the only local agencies required to submit at this time. Once these agencies initiate their AFH process, the City will collaborate with them to consider future policies, actions or measures they will be proposing to supplement the Consortiums efforts.

IV.1.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Instructions

Community input is sought every five years for the AFH plan (formerly Analysis of Impediments) and the Consolidated Plan as well as annually for the Action Plan. As the Consortium moves forward, this input shapes the strategies and sets priorities each year for the 5 year and annual plans. Each year activities are reviewed and assessed as to success and impact which is shared with the community through the Consolidated Annual Performance and Evaluation Report (CAPER).

Fair Housing Analysis

Fair Housing Analysis > Demographic Summary

V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

- Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

Race/Ethnicity

Table 2 (Demographic Trends) for the Consortia shows the ethnic distribution for Consortia and Riverside County from 1990 through 2010. From 1990 to 2000, White (non-Hispanic) remained the majority Ethic/ Racial groups in both the Region and Consortia. However, in 2010 Hispanics eclipsed Whites as the majority population in both the Region and Consortia. This pattern remains the same today with the Hispanic population representing 41 percent versus 39 percent for Whites for the Consortia. For the Region, Hispanics represent 47 percent versus 37 percent for Whites. It's important to note that Whites (non-Hispanic) was the only racial /ethnic group to lose population in both geographic areas. Starting in 2010, Whites (non-Hispanic) became the minority population in both geographic areas.

The metro region, Consortium, and Victorville have all become majority-minority areas since 1990. Counter to these trends, Apple Valley remains a majority non-Hispanic white population center, and its white population has actually increased in absolute terms. In 1990, both jurisdictions were very similar in size and demographic profile. Today, Victorville is much larger than AV and its demographics mirror trends in the region as a whole, unlike Apple Valley.

National Origin

Currently, the foreign-born population in the Consortia is 14 percent versus only 8 percent in 1990. For the Region, the current foreign born population is 22 percent versus only 14% in 1990.

Limited English Proficiency

Similar to the foreign-born population in both areas, there was a steady rise in Limited English Proficiency (LEP) from 1990-2010. After the 2010 Census, there was slight decrease in LEP by .5 percent for the Region and .2 percent for the Consortia. Currently, 9 percent of the Consortia's population and 15 percent of the Region's population are LEP.

While the Hispanic population increased by 31 percent from 2000 to 2010, the foreign-born population increased by less than 5 percent, which indicates that the Consortia s increased population over the Census periods is largely a result of people moving within the U.S. or new births.

Sex, Age and Family Type

Both the Consortia and Region's male and female population remained relatively even (50/50%) from 1990 to present. In terms of age, individuals 18-64 have represented more than 54 percent of the population since 1990 for both the Consortia and Region. Seniors (65+) remained the smallest population for both areas since 1990. Today, the percentage of seniors for both areas are relatively the same (11% Consortia/ 10% Region).

Like the 18-64 population, households with children have been the majority family type since 1990 for both the Consortia and Region. Today, the percentage for this family type are relatively the same for both areas (52% Consortia/ 51 % Region).

Racial/Ethnic Population. (Individual Jurisdictions)

In Apple Valley, in 2010, the largest racial/ethnic demographic is White, Non-Hispanic, with nearly 38,671 persons or 55.58 percent of the population. Since 1990, that demographic has decreased from 80.91%. Hispanics make up the second largest demographic with more than 20,279 persons, or 29.14%, and has increased from 12.02% in 1990. Black, Non-Hispanic rounds out the top three with 5,974 persons at 8.59%, which also increased from 3.72 in 1990. By comparison, in 2010 the region's largest demographic is Hispanic with 1.55 million or 47.25%, up from 26.48% in 1990, followed by White, Non-Hispanic at 36.61%, down from 62.41% in 1990, and rounding out the top three, Black, Non-Hispanic at 7.1%, up slightly from 6.52% in 1990. Apple Valley has become more diverse over the span of 1990-2010. Though population has increased significantly across all races and ethnic backgrounds over this time period, the population of white residents has trended down while black and Hispanic residents have trended upward. This is also true of the Riverside- San Bernardino-Ontario, CBSA on the whole.

The U.S. Census Bureau reported Victorville's population at 122,225 as of July 1, 2015. Victorville experienced a tremendous growth between 2000 and 2010. The table below illustrates Victorville's population growth.

Victorville's Population Growth

1990 2000 2010 2015 change

The City of Victorville has increased in population and in diversity over the last 25 years. These trends are similar of other communities throughout California. Table 1 and 2 illustrate Victorville's demographics and demographic trends. In 1990, White made up 65.94% of the population. The percentage dropped to 48.38% in 2000 with another significant drop in 2010 to only 28.88% of the population. The largest increase in population was among the Hispanic population. In 1990, Hispanic only made up 22.41% of the population. The Hispanic population increased to 33.75% on 2000 and significantly increased to 47.42% of the population in 2010. 2010 was an increase about 13.6% alone. The lowest population growth was among Native Americans, with an actual decrease in population of .15% from 1990 to 2010.

Race and Ethnicity	1990	2000	2010	2015
White	25,827	30,382	56,258	35,299
Black	3,750	7,431	19,483	19,312
Native American	323	380	1,665	794
Asian/Pacific Islander	1,352	2,202	5,130	4,950
Other	69	143	33,367	293
Hispanic	9,353	21,426	55,359	61,577

National Origin Population. In Apple Valley, in 2010, Mexico is the #1 Country of Origin with 2,400 persons, 3.5 percent, followed by Philippines at .4%, and rounding out the top three Canada with .39%. Overall, Apple Valley's Foreign Born persons increased from 5.55% in 1990 to 7.64 in 2010. By comparison, the region's top three Countries of Origin in 2010 are: Mexico with 553,493 persons or 13.1%,; Philippines, 1.8%, and El Salvador, .72%. Overall, the region's Foreign Born resident population nearly tripled from 360,666 (13.93%) in 1990 to 920,860 (21.80%) in 2010.

AFH Table 1 (Demographics) indicates similar results for Victorville as to Apple Valley. Mexico is the #1 Country of Origin comprising 12,423 people of Victorville's overall population. Table 1 also indicates that the next highest Country of Origin is El Salvador at 1.24%, followed by Philippines at 0.94%. In total, Mexico, El Salvador, Cuba (.30%), Colombia (.22%), Nicaragua (.22%) and Guatemala (.17%) encompass the majority National Origins explaining why Victorville's Hispanic population has been the most prominent throughout the years. All these Countries make up 12.75% of Victorville Latin/Hispanic Origin. Other Countries of Origin are below 0.50%, Korea (.34), Cambodia (.28%), and Vietnam at 0.23%.

Limited English Proficiency. In Apple Valley, in 2010, Spanish is the #1 LEP language with 2,400 persons,3.7 percent, followed by Korean at .19% and Chinese at .11%. Overall, Apple Valley's LEP population increased from 2.69% in 1990 to 4.15% in 2010. By comparison, the region's top three are Spanish at 533,544 or 12.63%, Chinese at .49%, and Tagalog at .4%. Overall, the region's LEP population increased from 9.73% in 1990 to 15.17% in 2010.

With the growth in the Hispanic population residing in Victorville, the limited LEP population has grown as well. In 1990 the LEP population made up 7.15% of the population. By 2010 the percentage of LEP population increased to 12.15%. The majority of the LEP population primarily speaks Spanish. Foreign born residents make up 17.36% of the population in 2010, an increase of 6.96% from 2010, most being from Mexico.

<u>Disability Type.</u> In Apple Valley, in 2010, Ambulatory Difficulty is the highest Disability Type with 5,751 or 8.98%, followed by Hearing Difficulty with 3,771 residents or 5.89%, followed by Vision rounding out the top three at 3.69%. By comparison, the region's top three Disability Types are Ambulatory at 241,262 residents or 6.18%, Independent Living Difficulty at 4.37%, and Cognitive Difficulty at 4.36%. Victorville has a small disabled population. Current demographics indicate the largest populations of disabled individuals have ambulatory difficulty at 5.98%. This poses a need for ADA modifications of government buildings and the addition of sidewalks. Vision and Hearing disabled persons make up about 6.21% of Victorville's demographic. It's because this population, the City continues to fund its Senior Home Repair Program. Through the SHRP, many residents have been able to qualify for ADA improvements in their homes.

Families with Children. Families with children make up a substantial percentage of the population in Apple Valley and Victorville. In Apple Valley alone, in 2010, there were 7,872 families with children at 44.17 percent of the population, down from 50.11% in 1990. In the region, in 2010, 500,062 families with children at 50.99 percent, up slightly from 50.68 in 1990. Victorville's Family Type encompassed 51.38% of the population in 1990. This percentage has gradually increased throughout the years. In 2000, there was an increase of almost 4.7% and a small 1.16% increase in 2010 totaling 57.20% of Victorville entire population.

V.A.2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

Instructions

Revised (Click for previous text)

Consortia

AFH map 16 (Housing Tenure) below shows the primary location of owners within the Consortia by Census tracts. The darkest gray census tracts indicate more than 79 percent of the Consortia's households as owners. As illustrated by the map below, the location of these owners is primarily outside the core of the Consortia. The R/ECAP area has the lowest percentage of owners at less than 29 percent. The map below shows the primary location of renters within the Consortia by Census tracts. The darkest gray census tracts indicate more than 70 percent of the Consortia's households as renters. Unlike the previous map, the location of these renters is primarily northwest and near the core of the Consortia. The highest percentage of renters (>70) is located within the R/ECAP area

Home Value

According to the most recent ACS data available for both jurisdictions, Victorville's home value increase by 92%, more than 17% higher than the County between 2000 and 2013. Precipitous rise in housing costs could lead to many residents, particularly households with incomes below the moderate income level and first –time home buyers, unable to afford housing within the jurisdiction.

Conversely, Apple Valley's home values remain some of the lowest in the Region. Although Apple Valleys home value increased by 51% over the 13 year period, it was still lower than the County's (-24%) and much lower than Victorville's (-41%).

Rents

Medium contract rents in the Consortia remained relatively low (Victorville 31% and Apple Valley 22%) compared to the 69% increase for the County between 2000 and 2013. Similar to home values, Apple Valley's rents increase was 46% less than the County's and 9% less than Victorville over the 13-year period.

Victorville	Base Year: 2000	Most Recent Year: 2013	% Change	San Bernardino County % Increase (2000-2013)	% Difference between changes in county v. jurisdiction, correct?
Median Home Value	\$95,600	\$183,800	92%	75%	+17%
Median Contract Rent	\$896	\$1,178	31%	69%	- 38%
Apple Valley	Base Year: 2000	Most Recent Year: 2013	% Change		
Median Home Value	\$109,500	\$165,300	51%	75%	-24%
Median Contract Rent	\$818	\$1,000	22%	69%	-46%

Source 2000 Census and 2013 ACS Data

Individual Jurisdictions

Apple Valley. Renters are most prominently found in two census tracts of Apple Valley where Residential Multi-Family (R-MF) zoning is the most dominant developed land use. These areas include Census Tracts 97.10 and 97.16. Housing Choice Vouchers are also in greatest supply in these areas due to the higher density of rental units found in these tracts. The combined effect has produced a strong trend of rental units in those areas since Apple Valley incorporated in 1988. Local knowledge of the area supports that homeowner and renter households are otherwise spread throughout Apple Valley without clear dominance in any other areas.

<u>Victorville.</u> Race and ethnicity can have implications for housing choice, as certain demographic and economic variables correlate with race. Old Town Victorville has always been viewed as a predominately Hispanic neighborhood. Currently, there are only a limited number of housing options available for these residents: rental or owner housing in Old Town planning area, or mobile home parks. Because of low income earnings and high housing costs in the community, many households are unable to buy or rent housing that provides sufficient living space for their needs, and therefore are faced with overcrowding. Although, this may be the case for the residents living in Old Town, the cultural amenities, such as specialty markets and local small businesses catering to the Hispanic community, provide the conveniences these families seek. Special bakeries known as "panaderias" and stores selling piñatas are commonly found in Old Town. The oldest Catholic Church in Victorville is at the center of Old Town Victorville, offering several Spanish masses.

Brentwood was a development community that was built in the late 1990's. The new development included an elementary school and a spacious park. During the housing crisis, Brentwood was one of the hardest hit communities with foreclosures. Investors purchased a great amount of these foreclosures and turned them into rentals. With affordable rents for larger homes were available, Victorville experienced a large Black population growth in this area. This once sought after community began to experience high crime rates and code enforcement issues, such as lack on landscape maintenance and disabled vehicles. Local pizza restaurants implemented a no delivery after 5:00 p.m. for this area because of the multiple muggings of their drivers. Since the housing market has seen an increase in sales prices, many of the rental homes in Brentwood have sold to homeowners. Currently, 71% of the homes in this area are owner occupied.

A continued depressed area in Victorville is in the east side of Victorville, cross streets of Rodeo Drive and Seneca. This area contains multiple, older apartment complexes. It also contains smaller, older single family residences. The demographic makeup of the area is predominately very low and low income Black and Hispanic population.

<u>Region.</u> According to Census QuickFacts, the owner occupied housing rate for 2010-2014 was 67.1% for Apple Valley and only 60.1% for San Bernardino County. Though the jurisdiction retains a higher owner- occupied rate than the region, homeownership is on the decline as increasing home values have also priced out lower-income persons from being able to enter the housing market.

Fair Housing Analysis > General Issues V. Fair Housing Analysis > B. General Issues > Segregation/Integration V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Analysis Instructions V.B.i.1. Analysis V.B.i.1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation. **1** Instructions **6** Relevant Data Revised (Click for previous text) The index of dissimilarity is a demographic measure of the evenness with which two groups are distributed across component geographic areas that make up a larger area. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the

groups measured. Dissimilarity index values of 0 to 39 generally indicate low segregation, values between 40 and 54 generally indicate

moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

Apple Valley. Historically, Table 3 shows that the Dissimilarity Index has been trending upward in almost all of the racial/ethnic categories from 1990 through 2010 for Apple Valley. Black/White populations experience the highest rates of segregation in the jurisdiction with an Index of 24.46. This and the other categories are under 40.0 and are therefore considered relatively low indicators of segregation in the jurisdiction. However, segregation at the Consortium level is 10+ points higher for each group than in either Jurisdiction alone. Segregation in Apple Valley has increased significantly, even as segregation in neighboring Victorville has decreased.

<u>Victorville.</u> Table three (3) illustrates the racial and ethnic dissimilarity trends in Victorville and the Riverside-San Bernardino-Ontario Region. Trends indicate that the Victorville area has a very low degree of segregation, with the lowest percentage of segregation among the non-white and white population at 14.50%. The highest segregation index was among the black and white population with an index percent of 18.46, still within a low segregation range.

Region. On a regional basis, the Dissimilarity Index indicates moderate segregation across all populations with the highest being Black/White populations at 47.66 in 2010.

V.B.i.1.b. Explain how these segregation levels have changed over time (since 1990).

- Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

According to the Racial/Ethnic Dissimilarity Trends table below, both Consortia and the Region segregation index rose for all racial/ethnic groups from 1990-2010. The exception was Asian or Pacific Islander within the Consortia which had a slight decrease in level of segregation in 2000. Currently, all racial/ ethnic groups in the Consortia segregation index dropped for their 2010 levels, except for Asian or Pacific Islanders which rose by approximately 2 percent.

When comparing the average level of segregation over the three Census periods, no group in Consortia experienced higher than "low segregation". However, for the Region, Blacks and Hispanics experienced "moderate" levels of segregation. It is important to note, that Blacks were the only group within the Region that experienced higher than "low" segregation in all three Census periods (1990,2000, 2010). Currently, all groups are experiencing moderate segregation within the Region. Blacks had the highest moderate segregation index of 47.66.

As pointed out in the Demographic Summary, the metro region, Consortium, and Victorville have all become majority-minority areas since 1990. Counter to these trends, Apple Valley remains a majority non-Hispanic white population center, and its white population has increased in absolute terms. In 1990, both jurisdictions were very similar in size and demographic profile. Today, Victorville is much larger than Apple Valley and its demographics mirror trends in the region as a whole, unlike Apple Valley.

Table 3 - Racial/Ethnic Dissimilarity Trends

	(Cnsrt- <i>i</i> Jurisdio		CA CONSORTIA) (Riverside-San Bernardino-Ont				o-Ontario, C	A) Region
Racial/Ethnic Diss Index	imilarity 1990 Tr	end 2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	20.82	24.27	30.52	29.14	32.92	38.90	38.95	41.29
Black/White	32.44	25.74	36.38	34.02	43.74	45.48	43.96	47.66
Hispanic/White	20.43	26.70	30.35	28.59	35.57	42.40	42.36	43.96
Asian or Pacific Islander/W	/hite 23.08	17.89	23.76	25.88	33.17	37.31	38.31	43.07

Note 1: Data Sources: Decennial Census

Individual Jurisdictions

<u>Apple Valley.</u> Since 1990, all population categories, except the 2000 census for the category of Asian Pacific Islander/White, have trended upward with each census year in the Apple Valley jurisdiction.

<u>Victorville.</u> Table 3 provides Racial/Ethnic Trends for the Jurisdiction. Among the non-White and White population there was a fluctuation on dissimilarity trends since 1990 to 2010. In 1990 the dissimilarity index was 14.22%; in 2000 there was an increase to 18.80, indicating a larger degree in segregation between these categories. The gap decreased in 2010 when the index dropped to 14.50%.

The Black and White population experienced a higher degree of segregation with an index of 26.40%. Integration began to happen in 2000 when the index dropped to 22.24% and even more so in 2010 when the index dropped to 18.46%. This was the largest change in the dissimilarity index showing a greater increase in integration among these populations.

Victorville numbers for residents of Hispanic and White race/ethnic backgrounds grew and dropped. In 1990 the dissimilarity index was at 17.63% and increased to 19.97% in 2000. The index decreased significantly in 2010 to 14.53%. Among the Asian or Pacific Islander and White population experienced a fluctuation in index numbers as well. In 1990 the dissimilarity index was 22.54% with a significant decrease in 2000 to 13.44%.

This number increased in 2010 to 17.48%. Although Victorville's Racial/Ethnic Dissimilarity Trends have fluctuated throughout the years of 1990, 2000 and 2010, its Racial/Ethnic Dissimilarity Index remained significantly lower than that of the Riverside-San Bernardino-Ontario Regions. On average, the Regions dissimilarity index's averaged over 40.0 for 2010 for all Races/Ethnicities.

<u>Region.</u> All population categories (Non-White/White, Black/White, Hispanic/White, and Asian or Pacific Islander/White) have also continued an upward trend over the same time period in the region. As a result, all categories indicate moderate segregation in the region as whole. If that trend continues to the next census, some populations could be on the cusp of high segregation (55.0+).

V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

- V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.
 - Instructions
 - Relevant Data
- Revised (Click for previous text)

Consortia

The presence of residential segregation may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. According to Map 2 below, Census year 2010 illustrated a higher segregation of Hispanics (blue dots) within the western region of the Consortia. In the southeastern area of the Consortia, the map illustrates a higher cluster of Whites (orange dots). This lack of integration of protected classes in this area could be an issue if it is a "higher opportunity area" compared to the Consortia as a whole. Further analysis regarding this issue will take place later in this AFH.

Individual Jurisdictions

Race/Ethnicity. Apple Valley shows all the signs of being a well-integrated jurisdiction. Divides of Race/Ethnicity are not apparent in any tract. Areas of greatest population density do have economic challenges that will be addressed elsewhere, though they remain just as integrated as the surrounding areas of Apple Valley. In 1990, it is apparent that there was a far higher predominance of Whites in the population, but integration was still achieved then, as well as in 2000.

In 1990, Victorville was a predominantly White community, making up 65.94% of the population. In 2000, Whites made up 48.38% of the population. In 2010, there was a large race growth in the Hispanic community making up 47.42% of the population while the white population dropped to 28.88%. This is evident in Map 2, which shows a large White population during 1990.

Victorville's Map 1 depicts a more integrated jurisdiction as of 2010. The increase in the Hispanic population is evident in this map. The largest Hispanic population has increased in the south-west area of Victorville, which includes the development known as Liberty Village and Brentwood.

<u>Country of Origin.</u> When examining Apple Valley, Map 3 (National Origin) shows that the most populous country of origin in the jurisdiction is Mexico. Though this population is wholly represented throughout the Town, the areas displayed with boundaries of Waalew Road to the north, Highway 18 to the south, Joshua Road to the east and Corwin Road to the west in the jurisdiction, are almost exclusively represented by Mexican origin. Mexico is followed by the Philippines, Canada, China, and Germany. However, very few representatives of these populations reside in the boundary predominantly represented by those with national origin of Mexico.

Map 3, National Origin, depicts that the most populous country of origin for Victorville is Mexico, with El Salvador and Philippines second and third, respectively. All three national origin countries tend to be located in the southeast area of Victorville, mostly in Liberty Village, a development that was built in the mid 1980's and in the Old Town area.

<u>Limited English Proficiency.</u> The population of those who are of LEP, Map 4, is becoming a greater concern for Apple Valley. There is evidence that the Spanish speaking population continues to grow. The 2010 Census shows 3.69% of Apple Valley as Spanish speakers with LEP.

The largest population of LEP is the Spanish speaking population at 13.06% of Victorville's populations. Tagalog is second but only represents 0.38% of the population. Public notices and workshop flyers are available to the Spanish speaking population including City notices, such as water rate changes.

Region. The Region has significant areas of segregation in pockets of both Riverside and San Bernardino Counties compared to the communities within the Consortium.

V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Instructions

Revised (Click for previous text)

Consortia

As described in Section V1.2 above, the location of owner occupied housing is primarily outside the core of the Consortia. When examining the location of protected classes, there doesn't seem to be an issue of segregation or integration as it relates to owner-occupied housing. The Consortia's owner occupied housing is also well represented in higher clustered Hispanic areas.

However, the identified R/ECAP area had the highest percentage of renters with more than 70 percent. Based on the analysis completed in the previous section, this R/ECAP area also has a high cluster of Hispanics compared to the Consortia as a whole. The presence of residential segregation may appear as clusters of a single color of dots representing one protected class. Therefore, renter housing is located primarily in a segregated area of the Consortia.

Individual Jurisdictions

Apple Valley. Though the jurisdiction does not have areas of racial/ethnic segregation, there are multi-family residential zoned areas in low-income census tracts, where there is also a predominance of rental apartment units. These areas, Census Tracts 97.16 and 97.10, consist of many two (2) to four (4) unit complexes as well as eight (8) unit and larger complexes, depending on the parcel size. Though the multi-family units co-exist among many single-family residential homes on R-MF parcels, these also have a greater tendency to be rental units. Ownership is otherwise spread through all areas of Town and does not seem more prevalent in any areas, aside from where the presence of multi-family units is greater due to the land- use designation.

<u>Victorville.</u> As previously mentioned Brentwood rental housing rate is at 29% of the areas housing units. Brentwood continues to be predominately Black neighborhoods. In addition the majority of the residents living in Victorville's Old Town area are predominantly Hispanic.

V.B.i.1.e. Discuss how patterns of segregation have changed over time (since 1990).

Instructions



Revised (Click for previous text)

Consortia

Since 1990, the Consortia has had Whites and Hispanics as its principal populations. Based on the Race/Ethnicity trends maps presented below, Whites and Hispanic households were fairly evenly distributed throughout the Consortia. However, in 2000 a pattern of Hispanics clustering near the western region of the Consortia begins to take shape. In 2010, a clear segregation of Hispanics in the western region is represented by a cluster of blue dots.

Individual Jurisdictions

Apple Valley. Maps 1, and 2, depict a landscape of population growth across all tracts between 1990 and present day. The recurring theme is that the White population did not grow in Apple Valley at a rate near, or close to that, of the Hispanic population. Table 1 reiterates this showing White population rose only 14% in population over that period of time, while Black residents rose 282% and Hispanics an even higher gain of 301%.

Map 3 shows that the tracts in the central and east parts of Town north of Highway 18, have the greatest representation of residents whose national origin is Mexico. When reviewing Map 4, Limited English Proficiency (LEP) among Spanish speakers is the most prevalent in these same areas. Though also represented elsewhere, there is a lack of other languages being represented in those areas as well.

V.B.i.1.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

1 Instructions

Revised (Click for previous text)

As pointed out in the Demographic Summary, the metro region, Consortium, and Victorville have all become majority-minority areas since 1990. Counter to these trends, Apple Valley remains a majority non-Hispanic white population center, and its white population has increased in absolute terms. In 1990, both Jurisdictions were very similar in size and demographic profile. Today, Victorville is much larger than AV and its demographics mirror trends in the region as a whole, unlike Apple Valley.

Land-Use.

Apple Valley's zoning has traditionally been focused towards lower density residential uses in Apple Valley. The jurisdiction was founded on the basis of rural single-family residential and estate sized lots. The glorification of ranch-style living has been a recurrent theme in Apple Valley's history and has carried over to the present day via minimum half acre lot sizes throughout the jurisdiction. However, when compared to the region, affordability for both rents and home ownership is considerably lower in Apple Valley than most all areas in the

most southern parts of the two-county region and prices are comparative with our local neighbors, Hesperia and Victorville, who have more desirable access and proximity to Interstate-15. The Town of Apple Valley has an approved Housing Element that provides for enough variety in land uses to accommodate housing units across all levels of density and affordability.

Victorville. The Victorville General Plan and Zoning Ordinance provide for a range of housing types and densities with adequate amounts of available land for development. The City offers varying zoning standards to encourage lower cost housing.

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

The City of Victorville is currently working towards the Revitalization of Old Town/Midtown Area. The City invested financial resources to develop and update the previous Old Town Specific Plan dated April 1995. Revitalization efforts are being considered to address old and unsafe housing stock, crime and blight, outdated and poorly functioning infrastructure, and declining of property values. City staff is currently researching and developing a comprehensive and strategic plan that involves the review of land use to make the Old Town area a way that pedestrian traffic will support retail businesses, increase residential development to support retail business and encourage business development. This will promote integration of compatible land uses; encourage greater recreational use of the existing open space; establish a location for cottage industry, live/work providing more opportunities for people of lower income and disabilities; and to address the adjacent transit station as a focal point in the Downtown area. Revitalization of Old Town will consider existing Downtown Development Codes, Capital Improvement, encourage a sales tax sharing program and promote infill housing development. The goal to revitalize Old Town is to improve safety and provide more opportunities to minorities, such as the Hispanic population that currently resides in Old Town.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Additional Information

V.B.i.2. Additional Information

V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

Instructions

Revised (Click for previous text)

Apple Valley. Community input gathered via meetings and surveys did not reveal an indication of segregation among protected classes. However, there were strong feelings over the treatment of some protected classes when seeking housing throughout the jurisdiction. Denials based upon race and source of income were the most common reported instances of discrimination. Though not apparent in survey results, Inland Fair Housing and Mediation Board also reported the following concerns:

Based on fair housing data, disparities may exist in the jurisdiction and region for groups of the disability protected characteristic. Apple Valley saw an increase in the numbers of reported disability discrimination cases from IFHMB over this four-year period. For instance, in Apple Valley in 2011 there were seven (7) disability related cases that were opened and in 2015 there were fifteen (15) cases that were opened for the year, an increase of 114%.

Victorville. One of the questions asked in the Survey was if residents thought the neighborhood they lived in was segregated. Close to 83% of the respondents stated that their neighborhoods are integrated and people of all backgrounds are welcome. With less than 7% respondents that thought their neighborhood was segregated stated that it was a result to high housing sales or rental pricing.

Input from the stakeholder meetings, specifically with real estate professionals, indicates there is no evidence of segregation. The community has a good balance of integration between race and ethnic groups. A common comment received by real estate professionals and community members is that people tend to gravitate and want to live near people that are like them, such as people with similar interest or occupations. This is evident in the surrounding community of Spring Valley Lake. This community is in the San Bernardino County pocket in Victorville. The community consists of a man-made lake and other resort like amenities. People that are interested in boating, water sports and fishing seek homes in this area.

In addition, research indicates that families do better when they live in a strong and supportive community. Many people relocate from other surrounding areas in the County of San Bernardino to Victorville because of the proximity to Interstate-15, health care facilities, large shopping centers and restaurants, entertainment options, and location to the Victor Valley Community College. Local knowledge has indicated that other surrounding communities do not offer the amenities that Victorville has. It's apparent that these are just a few reasons why Victorville has become diverse over the years. Past local knowledge has indicated that surrounding communities have been more segregated due to the cost of housing, professional backgrounds and language spoken. The Revitalization of Old Town Victorville will also encourage place-based investments and increase mobility options for minority and other protected class groups.

V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

Instructions

Revised (Click for previous text)

Apple Valley. Despite the dissolution of Redevelopment in California in 2012, the Town of Apple Valley was able to set-aside various properties to hold for future affordable housing development. Enlisting the expertise of experienced affordable housing developers, staff is confident that the first of several projects will be to develop a 10 (ten) acre site near Navajo and Sioux Roads as a two phased senior and family complex. With great proximity to a grocery store, transit, schools, a medical clinic and a park, the project will serve as an attractive neighborhood investment for many years to come and a key to revitalizing the area.

<u>Victorville.</u> Place-based investments often referred to as "community-change initiatives" and are led by nonprofits or governments seeking to improve conditions in targeted low income communities. By supplying tailored social services, technical assistance, grants and capacity building resources in a specific geographic area, place-based initiatives intend to benefit residents directly through improved services and indirectly through strengthened social networks. Currently, the City's Economic Development Department is developing a plan to assist the Old Town Area of Victorville with an overall revitalization of the area. The area includes older housing stock and abandoned commercial buildings. Neighborhood Stabilization Program income funds are being earmarked for a possible mixed use project. The objective to revitalize Old Town Victorville is to create opportunities for residents of all protected class levels, develop beautiful and safe neighborhoods, and create positive economic and social outcomes through federal, state and private investments, particularly for those experiencing decline or disadvantages.

The City has launched two city-wide loan programs to assist property owners, both owner occupied and rental property, with assistance to correct code violations and improve curb appeal to their property.

Victor Valley Transit Authority (VVTA) offers a Sunday delivery program for the handicapped for direct routes around the High Desert. It can sometimes take a half to full day to navigate the bus lines to get somewhere and VVTA has identified that that is an impediment to the disabled.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Contributing Factors of Segregation

V.B.i.3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

1 Instructions

Revised (Click for previous responses)

Lack of public investments in specific neighborhoods, including services or amenities

Land use and zoning laws

Location and type of affordable housing

V.B.i.3. Contributing Factors of Segregation - Other

Revised (Click for previous text)

The data show that Victorville has accommodated the majority of the Consortium's population growth, and Victorville is providing a broader range of housing choices. This appears to be a major factor contributing to the existing pattern of segregation between the two jurisdictions and, given the demographic shifts in the county and region over the past couple decades, it seems likely to become exacerbated if the current situation doesn't change (Location and type of affordable housing- Contributing Factor).

V. Fair Housing Analysis > B. General Issues > R/ECAPs

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Analysis

V.B.ii.1. Analysis

V.B.ii.1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

- Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

Currently, the Consortia has a small R/ECAP area, which is included in a much larger R/ECAP containing unincorporated areas of San Bernardino County. The R/ECAP only includes Census Tracts 99.05 which is within Victorville's geographical boundaries. Census Tract 99.05 encompasses 3.89 square miles. The current population is 7,575 and includes 2,417 housing units. The geographical area that falls within this R/ECAP starts on the north side of Mojave Drive ending at Air Expressway, boundaries are west side of Interstate 15 and east side of Llana Avenue. This area is commonly referred to as the Village Drive Area.

In 2000 the City of Victorville had a small R/ECAP area. This area was located in what is commonly known as Old Town Victorville. The area is in Census Tract 98 and encompasses 1.29 miles. The current population in the Census Tract is 5,017. It contains 1,648 housing units. As of the 2010 Census this specific area is no longer an R/ECAP area.

V.B.ii.1.b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

- **1** Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

Table 4 R/ECAP Demographics states that the population comprising a portion of Census Tract 99.05 is 7,575. The race/ethnic make-up population located within the R/ECAP area is Hispanic 53.61%, White – 23.50%, Black – 15.50%, and Asian or Pacific Islander, Non-Hispanic – 3.80%. Compared to the Region's R/ECAP Demographics, these percentages drop with the exception of Hispanics exceeding and making-up 70% of the entire 216,883 population. Comparing Table 1 Demographics for the entire City of Victorville, the Hispanic community almost encompasses half of the entire population, at 47.42%. Regionally, the Hispanic community percentage is similar to Victorville's, 47.25%. Similarly, the White community is the second highest race.

Region. The region does have R/ECAPs outside of the one shared by Victorville and Adelanto area. The next closest R/ECAP in San Bernardino County is located to the North in Barstow. The rest are located to the south in San Bernardino City, Ontario, Fontana and Colton. Several others are located in the south and central areas of Riverside County (City of Riverside, Moreno Valley, Perris, Hemet, Indio, and Coachella Valley/Thermal).

The largest race/ethnicity categories, that make-up the two-county regional population of over 4.13 million people, consists of 47.25% Hispanic, and 36.61% White, Non-Hispanic. The total population of all the R/ECAPs in the region is 216,883 persons. Compared to the region-wide demographics, the White, Non- Hispanic population is significantly underrepresented in R/ECAPs consisting of only 14.65% of the population while Hispanics are considerably overrepresented (69.33%). Black, Non Hispanic populations are also slightly overrepresented in the R/ECAP areas; 7.14% is the regional population and 9.53% is the R/ECAP population.

Families with children represent approximately 50.99% of the families in the region. However, in the R/ECAPs, they disproportionately represent 63.04% of all families. The most dominant country of national origin is Mexico with a regional population of over 550,000 persons (or 13.10%). Unfortunately, R/ECAPs also carry a significantly larger proportion of this population with 23.29% of the 216,883 persons.

In R/ECAP Census Tract 99.05 total population is 7,575., The race/ethic make-up of the area are: White -49%, Black -16%, Native American -0.01%, Hispanic -22% and Other -7c.

V.B.ii.1.c. Describe how R/ECAPs have changed over time (since 1990).

1 Instructions

1 Relevant Data

Revised (Click for previous text)

Consortia

Map 2 depicts that in 1990 there were no R/ECAPS. However, in 2000, Map 2 shows that a small R/ECAP formed encompassing Census Tract 98, more commonly known as Old Town. This R/ECAP no longer exists. On the other hand, Map 1, illustrates how in 2010 another small area of the City of Victorville fell within a larger San Bernardino County Area R/ECAP. The majority of this R/ECAP is unincorporated San Bernardino County pockets. The R/ECAP includes Victorville Census Tract 99.05, which is commonly known as West City Planning Area and partially Southern California Logistics Airport (SCLA) Planning Area. In addition, two small areas of Census Tract 91.17 and 91.16 include industrial and commercial areas of SCLA; however residential properties are not located within these Census Tracts. It would be safe to say that the R/ECAP areas predominantly found in Census Tracts 91.17 and 91.16 are probably County areas.

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Additional Information

V.B.ii.2. Additional Information

V.B.ii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

1 Instructions

■ Revised (Click for previous text)

Consortia

Census Tract 99.05 village area is within the City of Victorville's West City Planning Area and is an older established community, which has a predominately White population. In addition, this Census Tract also includes a Mojave Vistas Planning area which is north of I-15, south of Rancho Road and west of National Trails Highway. The 2006 Mojave Vistas Planning Area Specific Plan allows for the opportunity of a wide variety of housing unit types varying from cluster units to R-1. The Mojave Vista Plan proposes over 53 acres of cluster housing, and almost 60 acres of R-1 residential, and 47.6 acres of R-1. Based on these housing development types, the Mojave Vista Plan allows for a wide range of housing price, type of product and lot size for an array of residents.

Region. The R/ECAP's throughout the region of San Bernardino and Riverside Counties have been adequately addressed through other sections of this document. There is no additional relevant information that has been identified.

V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

Instructions

Revised (Click for previous text)

Consortia

In an attempt to remove the R/ECAP that incorporates Census Tract 99.05, the Consortia will utilize HOME funding and other housing programs to remove barriers that prevent people from accessing affordable housing. For instance, the City of Victorville's Residential Code Correction loan program is meant to assist property owners, owner occupied and rental property, to correct code violations. A significant number of low income residents have expressed financial hardship that prevents them from correcting code violations, specifically connecting their failing septic system to the City's sewer system. The newly developed program will assist property owners with these delayed repairs.

With the implementation of the Mojave Vistas Specific Plan, public and private neighborhoods will include recreation centers and facilities including, but not limited to swimming pools, tennis courts, clubhouse and trails. The Plan provides for religious group development, public facilities (fire/police stations) and development of new schools. Neighborhood retail and commercial and administrative professional offices will be in close proximity.

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Contributing Factors of R/ECAPs

V.B.ii.3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

Instructions

Revised (Click for previous responses)

Lack of community revitalization strategies

Lack of public investments in specific neighborhoods, including services or amenities

V.B.ii.3. Contributing Factors of R/ECAPs - Other

Revised (Click for previous text)

Lack of Community Revitalization Strategies

The Consortia has a small R/ECAP area, which is included in a much larger R/ECAP containing unincorporated areas of San Bernardino County. The R/ECAP only includes Census Tracts 99.05 which is within Victorville's geographical boundaries. The Consortia's knowledge of the R/ECAP as it relates to the housing and social service needs of the area is limited. In fiscal year 2017-18, The Consortia will perform a community assessment to better understand the needs of the area which will lead to strategic investments using CDBG and HOME funding.

Lack of public investments in specific neighborhoods, including services or amenities

A significant number of low income residents have expressed financial hardship that prevents them from correcting code violations, specifically connecting their failing septic system to the City's sewer system. In an attempt to remove the R/ECAP that incorporates Census Tract 99.05, the Consortia will utilize HOME funding and other housing programs to remove barriers that prevent people from accessing affordable housing. For instance, the City of Victorville's Residential Code Correction loan program is meant to assist property owners, owner occupied and rental property, to correct code violations.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Educational Opportunities

V.B.iii.1. Analysis

V.B.iii.1.a. Educational Opportunities

V.B.iii.1.a.i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

- **6** Instructions
- Relevant Data

Consortia

Table 12 index scores shows that Blacks/ Non-Hispanics had the lowest access to opportunity to proficient schools compared to other groups. When poverty level is factored in, Blacks/ Non-Hispanics continued to have the lowest access to opportunity in the Consortia, followed by Hispanics. In the Region, the index score for Hispanic's access to proficient schools is lower when compared to other race/ethnic groups. This continues to be the case in the Region when examining Hispanics below the poverty line.

Individual Jurisdictions

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools within 1.5 miles of the block-group. The higher the index score, the higher the school system quality is in a neighborhood. Values are percentile ranked and rage from 0 to 99 max; average is 49.

Apple Valley. Table 12 (attached) shows that Asian or Pacific Islander, Non-Hispanics, have the best access to proficient schools (54.03) while Hispanics have the lowest access (44.49). Regardless of what race/ethnicities have better access, overall the proficiency index is low across all races/ethnicities. Therefore access to proficient schools is poor across all races and ethnicities. National origin and family status appear to be equally underserved.

<u>Victorville.</u> HUD provided Table 12 and Map 9 depicts a below average school proficiency index throughout the City. School Proficiency Index among all races/ethnicity are close in range, with the lowest being Asian or Pacific Islander, Non-Hispanic at 32.52. Native American, Non-Hispanic are the highest at 37.54.

In Census Tract 98 (Old Town Area), Schools Proficiency Indexes is within the 20. 1-30. Although the School Proficiency Index appears to be much lower than the overall jurisdiction, this Census Tract has a predominately Hispanic population. Overall, Victorville has a low School Proficiency Index in all race/ethnic categories. Therefore, access to proficient school is poor across all races and ethnicities.

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Cnsrt-Apple Valley, CA CONSORTIA Jurisdiction	A) Poverty Index	School Proficiend Index	Labor cyMarket Index		t Low Transportation	Jobs Proximity Index	Environmental Health Index	
Total Population								
White, Non-Hispanic	33.43	43.86	18.18	29.14	17.15	53.79	83.01	
Black, Non-Hispanic	24.77	36.74	15.17	29.58	18.83	54.56	80.43	
Hispanic	25.43	36.92	15.37	29.16	17.76	52.37	79.45	
Asian or Pacific Islander, Non-Hispanic	31.24	39.36	18.85	28.23	16.07	51.84	82.56	
Native American, Non-Hispanic	28.19	41.43	13.18	29.78	18.59	59.89	80.40	
Population below federal poverty line								
White, Non-Hispanic	25.44	37.44	12.97	31.85	19.80	50.18	82.57	

Black, Non-Hispanic	20.41	35.59	13.43	30.48	20.36	53.50	80.18
Hispanic	20.67	36.63	11.22	31.09	22.08	53.44	78.40
Asian or Pacific Islander, Non-Hispanic	18.45	37.24	12.54	31.62	21.28	53.24	82.48
Native American, Non-Hispanic	39.64	44.86	19.74	24.09	12.45	46.98	83.50
(Riverside-San Bernardino-Ontario CA) Region),						
Total Population							
White, Non-Hispanic	52.61	53.16	34.50	37.96	25.75	49.50	61.98
Black, Non-Hispanic	42.80	43.79	27.18	42.55	31.82	49.72	52.97
Hispanic	37.51	41.01	24.20	43.12	32.68	47.81	52.59
Asian or Pacific Islander, Non-Hispanic	60.42	59.23	43.02	41.92	29.18	48.25	52.51
Native American, Non-Hispanic	41.19	45.54	25.06	36.84	26.34	50.16	61.60
Population below federal poverty line	9						
White, Non-Hispanic	38.39	44.64	25.55	38.74	29.20	49.95	62.31
Black, Non-Hispanic	27.15	35.04	17.39	43.48	34.78	48.95	51.90
Hispanic	23.78	34.76	16.42	44.76	36.54	49.34	52.37
Asian or Pacific Islander, Non-Hispanic	42.30	44.82	30.51	45.00	37.05	51.32	49.15
Native American, Non-Hispanic	30.24	39.41	20.61	39.17	32.05	52.23	58.72

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

V.B.iii.1.a.ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Instructions

Relevant Data

Revised (Click for previous text)

Consortia

The below map illustrate school proficiency for the Consortia with race/ethnicity, national origin, and family status. The darker the shaded area, the higher the school's proficiency. Based on the maps, the area with the lowest school proficiency was located primarily in the western region of the Consortia (Victorville). The highest school proficiency was located in the eastern region of the Consortia (Apple Valley). Based on map 7, there seem to be a relationship between the residency patterns of racial/ethnic and national origin (Mexico) and proximity to proficient schools. Hispanics and individuals with Mexico as their national origin are clustered primarily west of the Consortia, which demonstrates their proximately to lower performing schools. However, there does not seem to be a relationship between family status and proximity to proficient schools.

Many pundits believe that areas segregated by lower-income ethnic groups often have underperforming schools due to inadequate attention to negative factors facing students in their community. According to a 2015 article, *Race and Schools: The Need for Action*, by Gary Orefield, Civil Rights Project/Proyecto Derechos Civiles, University of California–Los Angeles, schools are expected to create equal outcomes for students who leave their homes severely disadvantaged by family and community poverty, and arrive at their schools to find sometimes unqualified or inexperienced teachers, and leave those schools as soon as they can. Moreover, in many schools with Black and Latino students who are almost entirely poor and teachers who have little or no help in addressing the consequences of deep tensions that often exist in neighborhoods heavily affected by immigration, gangs, and other issues.

Individual Jurisdictions

<u>Apple Valley.</u> The jurisdiction is well integrated. The southeast portion of Apple Valley has lower population density than other areas and lower school proficiency. When reviewing National Origin information on Map 9, there is a greater likeliness that those areas are populated with residents who are originally from Mexico.

<u>Victorville</u> is a fairly racially integrated jurisdiction. Access to proficient schools is available to all residents. The school districts visionary mission statement is the following: "Victor Elementary School District is committed to inspiring purposeful learners who create their futures with confidence, curiosity, innovation, and integrity through engaging learning experiences in safe environments within a supportive culture."

V.B.iii.1.a.iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school Which protected class groups are least successful in accessing proficient schools?

1 Instructions

Revised (Click for previous text)

Apple Valley. School enrollment policies in the Apple Valley Unified School District are not discriminatory or exclusionary. A report conducted by the American Civil Liberties Union that mentioned the Academy of Academic Excellence (AAE) as an independent charter that discriminated against undocumented students, was highly refuted by Principal of AAE, Lisa Lamb, in an article by The Daily Press, Staff Writer Charity Lindsey: "[AAE is the...] only independent charter mentioned in our area." Lindsey clarified that the school operates as its own district where the others are dependent charters, but are using the same enrollment practices that every school within that district are using, which the report doesn't

disclose. Lindsey further notes that Lamb further reiterated that AAE "does not deny enrollment to any student for the reasons listed in the report." Therefore, the reason that AAE was singled-out is unfounded.

As previously indicated, Map 9, School Proficiency and National Origin, shows that residents accessing lower proficiency schools in the southeast region of Town, have an almost exclusive representation of originating from Mexico. Otherwise, access to schools appears to be evenly balanced between all protected classes.

<u>Victorville.</u> State average for English proficiency is 44%. This is based on test scores of low income students. Victorville elementary schools score between 15% - 26%. State average for math proficiency is 33%. Victorville elementary schools score between 7% - 11%.

The higher scoring schools are charter schools specializing in science, sports, art and music. The Victor Elementary School District has made a policy that makes school an option to all residents. All the school sites are "Schools of Choice". The District's policy breaks schools up into four (4) areas called quadrants. Students have the opportunity to choose any school within the quadrant in which they live based on their interest. The policy's flexibility even provides transportation to any school within the quadrants by the District.

Another policy that may affect a student's ability to attend a proficient school is the school's approach to homework. Some schools may provide links between home and school. Some specialty schools may believe that completing assignments independently at home using today's technology educates and prepares students as adults, connects education with the home environment. Assignments therefore, can be integrated in the home learning experience. The disadvantage to this is that not all households have accessibility to computers or internet, which is a minimum requirement in taking advantage of such a policy.

Grading policies have positive and negative effects on students that can also impact their ability to attend a proficient or better performing school. For instance, an approach where grades have no meaning to a harsh grading policy affects the student's future, critics the school and educators. Policies like this may impact a student's ability to be accepted into another district, particularly those that have above average school proficiency indices.

Based on the HUD provided Map 9, it appears Hispanic families (Mexican and El Salvador Origin) would have the least successful rates in accessing proficient schools for the Victorville population.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Employment Opportunities

V.B.iii.1.b. Employment Opportunities

V.B.iii.1.b.i. Describe any disparities in access to jobs and labor markets by protected class groups.

- Instructions
- Relevant Data

Revised (Click for previous text)

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the employment opportunities for residents in a neighborhood.

The Jobs Proximity Index measures the physical distances between place of residence and jobs by race\ethnicity. The higher the score, the higher the labor force participation and human capital in a neighborhood. Human capital means the skills, knowledge and experience possessed by an individual or population.

Consortia

According to Table 12 (consortia) above, all groups had relatively low opportunity to the labor market, averaging an index score of only 15.64. In addition, the disparity gap in access to the labor market by protected class is relatively small. Native Americans had the lowest access to the labor market at 13.18, while Asians had the highest at 18.85.

Protected class in the Region also had relatively lower opportunity to the labor market, averaging an index score of 30. However, it was more than 10 points higher that the protated classes within the Consortia disparity gap in access for the highest and lowest group is more pronounced. Asians had the highest access index in the Region (43.02), which was more than twice that of Asians located in the Consortia (18.85).

Individual Jurisdictions

Apple Valley. Table 12, Opportunity Indicators for Labor Market Index, shows that Hispanics have the lowest opportunity with 16.44. Of those below the Federal poverty line, Hispanics remain the lowest at 10.12. Overall, the highest categories consist of Asian or Pacific Islander, Non- Hispanic populations at 22.18 and White, Non-Hispanics with 20.42.

Map 10, Job Proximity and Race/Ethnicity, indicates that the northern and southwestern parts of the Town have the highest job proximity index scores. These areas have closer proximity to retail and commercial centers. The central parts of Town indicate the least access to job opportunities. This location is not nearly as walkable to the major commercial hubs within the Town boundaries.

<u>Victorville.</u> Table 12, Opportunity Indicators by Race/Ethnicity, Labor Market Index column, shows that Native American, Non-Hispanic population has the lowest opportunity at 10.81. The highest opportunity is available to Asian or Pacific Islander, non-Hispanic with an indicator of 17.49 followed by White, non- Hispanic at 16.12. Based on Map 10, there is generally a greater labor market in the south part of the City. This area consists of the Mall of Victor Valley and Restaurant Row. The White population in this area has the closest proximity to employment from their homes. Map 10 also depicts that the Mexican National Origin community may be the highest labor-force within this area of Victorville.

Map 10, Job Proximity Index, for the R/ECAP Area within the City of Victorville's jurisdiction depicts that Mexican and El Salvador National Origins; White, Non-Hispanic, Black, Non-Hispanic, and Hispanic appear have high index values to better access of employment opportunities. Table 12, Opportunity Indicators by Race/Ethnicity states Job Proximity Index for Asian or Pacific Islander, Non-Hispanic have the lowest job proximity index at 49.57.

Unincorporated areas of the City near City area appear have a Job Proximity Index between 20. 1-30 and 30. 1-40, significantly lower than other City areas. Although an integrated City, these areas appear to impact the White, Non-Hispanic, Hispanic and Black races/ethnicities.

- **1** Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

Proximity to jobs can affect the employment outcomes of residents. People who live closer to jobs are more likely to work. They also face shorter job searches and spells of joblessness. Proximity to employment proves particularly important to certain kinds of workers and residents. For instance, the duration of joblessness among black, female, and older workers tends to be more sensitive to job accessibility than it is for other kinds of workers. For poor residents, living closer to jobs increases the likelihood of working and leaving welfare. Proximity matters for lower-income, lower-skill workers in particular because they tend to be more constrained by the cost of housing and commuting. They are more likely to face spatial barriers to employment; thus their job search areas tend to be smaller and commute distances shorter. In contrast, higher-income, higher-skill workers, who can afford to commute by car and exercise more choice in where they work and live, have more prospects than just the jobs near their neighborhoods and commute longer distances on average (The growing distance between people and jobs in metropolitan America- Elizabeth Kneebone and Natalie Holmes Brookings Institute 2015).

Individual Jurisdictions

Apple Valley. White, Hispanic, and Black populations seem to reside equally in areas of low job proximity according to Map 10. National Origin does not seem to have any higher weight in low proximity areas than higher proximity areas either. However, families do appear to have greater concentration in low job proximity areas where housing is denser in availability. These areas are also less expensive, so it appears that families, in the pursuit of rental housing, are unfortunately gravitating towards areas that happen to have less proximity to jobs.

<u>Victorville.</u> Map 10 depicts that the Hispanic and Black population are farther in proximity to better jobs. These races tend to live in lower proximity index areas. The concentration of these race/ethnic groups tend to live in older housing stock that is more affordable for them but job opportunities are very meager.

A person's place of residence may be directly correlated to the opportunities they have in obtaining employment. In Victorville, for instance, many residents commute to other cities within the San Bernardino County and other surrounding counties. Because the Victor Valley is considered as one of the most affordable housing areas in Southern California people, may choose to commute in order to have lower mortgage or rent payments.

V.B.iii. 1.b.iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

- Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

Maps below illustrates job proximity index by racial/ethnic groups. The darker the shaded Census Tract, the more likely the opportunity to access job opportunities. According to the map, the Consortia's northern and central areas have the highest opportunity to access job opportunities. Based on a relatively even distribution of racial/ethnic dots, there doesn't seem to be one group least successful in accessing employment within the Consortia. This also the case when assessing national origin and family status.

Individual Jurisdictions

Apple Valley. Though Table 12 shows that Hispanic persons have the lowest proximity to job opportunities, it is not as apparent when examining Map 10. Overall, families appear in the greatest concentration in areas where access to employment is the lowest in the community.

<u>Victorville.</u> According to Map 10 Percentage of Households that are Families with Children live in areas where job proximity is high. This could be attributed to affordable housing for their family size; however some residents may have a longer commute to better jobs. Families within the 40.1 – 60.1% percentile appear to be unsuccessful in accessing employment. These families are not within the top five (5) National Origins for the City of Victorville. The Native American, non-Hispanic population seems to have the lowest labor market index at 10.81 percent. This population seems to be least successful in obtaining employment.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Transportation Opportunities

V.B.iii.1.c. Transportation Opportunities

V.B.iii.1.c.i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

- 1 Instructions
- Relevant Data

Revised (Click for previous text)

The Victor Valley Transit Authority (VVTA) is the local public transit agency providing fixed route bus service to the cities of Adelanto, Apple Valley, Hesperia, Victorville and portions of San Bernardino County, including Lucerne Valley, Phelan, Wrightwood, Pinon Hills Oro Grand, and Helendale. Weekday bus service also extends from Barstow to Victorville and down into the San Bernardino Valley at Fontana and City of San Bernardino. VVTA provides bus route service, commuter bus, paratransit to eligible persons, and vanpool services to High Desert commuters who commute throughout Southern California. The Transit Authority's service area spans over 950 square miles.

Apple Valley. Transit trips tend to be more frequent in the most densely populated areas of the Town according to Map 12. The area with the second highest number of transit trips correlates as part of an area where residents also experience lower access to job opportunities and lower incomes. According to Map 13, transit trips are also most frequent in areas with a greater influx of families.

Victorville.

Low Transportation Cost index measures the cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. Based on the HUD provided Table 12, Opportunity Indicators by Race/Ethnicity –, the Transit Index for Victorville's federal low income population compared to the Region (Riverside-San Bernardino-Ontario) is significantly less. The Native American, Non-Hispanic race in this same category in Victorville has a Transit Index of 21.0 compared to the Region's 39.17. This could be a result of the Victor Valley's limited access to transportation and routes within each community. Similar to other jurisdictions in the Victor Valley, many City of Victorville low-income residents struggle to find reliable transportation regardless of place of residence or cost. The need for more local and functional transit service to travel throughout the City for personal, work and recreational activities is very limited. Currently it may take several hours to make short trips due to route structures and low frequency of service. In addition, transportation service hours are short and only certain routes operate on Sunday.

Additionally, the Low Transportation Cost Index is also very low in Victorville compared to the Region meaning that the cost of transportation in Victorville is relatively higher. This may be a result to Victorville's high commuter population. A recent study reviewing the High Desert's Workforce briefly mentioned that residents living in Victorville who commute make up about 70% of its work-force population. Of the active workers, totaling almost 38,000 people, over 11,000 are employed within the High Desert communities, but over 26,000 Victorville residents commute. The majority of commuters drive to the San Bernardino County areas, but some as far as Los Angeles and San Diego.. Therefore, cost of transportation in Victorville is relatively higher.

V.B.iii.1.c.ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

- Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

According to Table 12 (Consortia) above, Asians (16.07) are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities in the Consortia. However, Native Americans below the federal poverty line were affected the most with an index of 12.5.

Regionally, all protected groups are less affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities (index 30) when compared to the Consortia (index19). Within the Region, Native Americans were most affected with an index of 26.34. Similar to the Consortia, Native Americans below the federal poverty line were also affected the most with an index of 32.5.

Individual Jurisdictions

Apple Valley. Table 12 shows that the transit trips index is relatively equal across all Race/Ethnicity categories. Those with National Origin of Mexico appear to have a slightly skewed representation in areas where transit trips are more frequent. However, families appear to have the most significant representation in areas where transit trips are highest. In pursuit of less expensive housing costs, families are locating to areas further from walkable resources and jobs that require them to rely more heavily on transit services if they don't have other means of transportation.

<u>Victorville.</u> As mentioned above the public transit system is limited in the City of Victorville causing all racial and ethnic households to be negatively impacted. Transportation accessibility based on Map 12, Demographics and Transit Trips, among households with children between the 40.01 – 80% percentiles located within the eastside of Victorville have the highest Transit Trips Index (30.1 – 40) indicating these households use public transportation more often than other categories. Additionally, the Mexican National Origin Transit Trips Index is highest ranging between 30.01 – 40. Transportation within the R/ECAP area located within the City of Victorville appears to have a low index, 20.1 – 30, mainly Mexican Origin. Based on the data provided, both indexes are still relatively low.

Because both Transit and Low Transportation Cost Indexes are low throughout all races and other protected categories, such as disabled persons, causing residents of the City of Victorville and surrounding jurisdictions to be limited in opportunities. The High Desert's Workforce study recently reported that Victorville workers median age for males is 37.6 and females 38.4.

V.B.iii.1.c.iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

Instructions

Revised (Click for previous text)

VVTA provides both fixed routes and ADA paratransit service within the Victor Valley area. Their services include: 10 local routes within the Victorville/Apple Valley area; 3 county routes including services to neighboring communities; and direct access ADA paratransit service. Because public transportation is a key component for ensuring that disabled persons have an equal opportunity in the employment industry, education, and access to facilities, the lack thereof leaves many adults with disabilities to fully participate in society. The passage of the 1990 ADA Act requires that all new public transit vehicles and facilities be accessible, disparities remain. Transportation buses have low-floor, ramps, grab bars and large signage; some transit agencies fail to comply with the requirement to announce bus stops making it difficult for visually and cognitive impaired persons. Paratransit eligibility criteria's may be too restrictive, trip denials, and late or no show buses are additional barriers for disabled individuals.

Typically, people living in small urban and rural areas have fewer public transportation options than those in larger urban areas. Based on the US Census Bureau, research indicates that as communities grow in population, public transit service significantly declines. Regionally, public transit services and access may be limited due to challenges in transportation spending patterns. As transportation cost increase, low-income households have less to spend on housing, education and other needs. Transportation costs are particularly burdensome for low-income households because they use a larger amount of their income to transportation expenses than higher-income households. In addition, rail transportation service, which typically serves higher-income riders, compared to bus service, may be funded and supported

more so by metropolitan areas and states than in non-metropolitan areas. This creates inequities between bus service that serves more low- income riders regionally and locally. In addition, expanding highways or rail service lines may also increase property values, making difficult for minorities and low-income households to afford housing in those areas.

Regionally and locally, minority and low-income individuals are also faced with language and information barriers. Some minorities and low-income individuals are unable to learn about transit options or have little voice in transportation planning because of language barriers or lack of information. Transportation policy makers make efforts to seek out and consider the needs of low-income and minority households, but effective mechanisms are not placed.

Other issues that create poor access and ability to use public transportation among the protected class groups are "green" gas emissions, transportation management, public safety and education to the benefits of using public transportation.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Low Poverty Exposure Opportunities

V.B.iii.1.d. Low Poverty Exposure Opportunities

V.B.iii.1.d.i. Describe any disparities in exposure to poverty by protected class groups.

- Instructions
- Relevant Data

Revised (Click for previous text)

The Low Poverty Index captures the depth and intensity of poverty in a given neighborhood. The index uses both family poverty rates and public assistance receipt. The resulting values range from 0 to 100. The higher the score, the less exposure to poverty in a neighborhood.

Consortia

Based on Table 12 (Consortia), Blacks had the highest exposure to poverty based on protected class within the Consortia. However, for residents below the federal poverty line, Asians/Pacific Islanders had the highest exposure to poverty. For the Region, Hispanics had the highest exposure to poverty amongst protected class, including groups below the federal poverty level.

Individual Jurisdictions

Apple Valley. As shown by Table 12, groups with the highest exposure to poverty are Black, Non- Hispanic (33.53) and Hispanic (33.91) populations. Of those below the federal poverty line, the same two groups both have an index right around 22.0, further indicating that these groups are the most exposed to poverty in their respective neighborhoods of Apple Valley. Map 14, Poverty and Family Status, reinforces that areas containing a propensity for multi-family residential properties have some of the highest rates of poverty, combined with the highest rates of families with children, ranging from 60.1%-80.0%.

<u>Victorville.</u> Map 14 illustrates demographics and low poverty index. The map includes R/ECAP Census Tract 99.05. This area has a very low poverty index with an integrated population consisting of Whites, Blacks, Hispanics and Native American, non-Hispanic. However, MAP 14, Low Poverty Index with Race/Ethnicity depicts that the Mexican Race has the lowest poverty index among Hispanics, approximately below 10.01, within the R/ECAP. This may indicate that income inequality among the Hispanic races/ethnicities is higher among Hispanics than among non-Hispanic whites.

The Federal Poverty Level (FPL) is the minimum amount of gross income that a family needs for food, clothing, transportation, shelter and other necessities. Although still low, the Native American population below federal poverty line index is 31.71%, the highest among all others. This may indicate that the Native American, Non-Hispanic race/ethnicity is less exposed to poverty compared to other races in Victorville and the Region. This population also shows a labor market index of 19.50%, the highest index within the federal poverty line. Other races/ethnicities have higher opportunities and lower exposure to poverty Regionally than in Victorville.

V.B.iii.1.d.ii. What role does a person's place of residence play in their exposure to poverty?

- Instructions
- Relevant Data

Revised (Click for previous text)

Apple Valley. Map 14, relating Poverty and Race/Ethnicity, does not show a clear propensity for poverty in any singular neighborhood or tract. All demographic groups are evenly represented. However, when the Poverty and National Origin map is singled out, Mexico becomes the standout country of origin in areas where the low poverty index indicates higher rates of poverty. As discussed previously, these areas have a higher magnitude of multi-family properties that tend to be occupied predominantly by tenants that are paying lower rent prices than they would to rent a single-family residence. The apartments are clustered in such a way that neighborhoods naturally have a higher likeliness for exposure to poverty.

<u>Victorville.</u> Populations that fall the federally poverty line tend to live where they can afford, often times not the most desirable neighborhoods in a community. Low income residents live in older housing stock as well as these homes tend to be more affordable. The southeast area of Victorville has a large low poverty index.

V.B.iii.1.d.iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

- Instructions
- **6** Relevant Data

Revised (Click for previous text)

Consortia

The map below illustrates location and degree of poverty based on census tracts. The darker shaded census tracts indicate lower exposure to poverty. According to the map, residence within or near the Consortia's core and western region had the highest exposure to poverty. With Hispanics primarily clustered near both regions, a place of residence for an ethnic/ racial group does seem to play a role in exposure to poverty in the Consortia.

Individual Jurisdictions

Apple Valley. As shown by Table 12, groups with the highest exposure to poverty are Black, Non- Hispanic (33.53) and Hispanic (33.91) populations. Of those below the federal poverty line, the same two groups both have an index right around 22.0, further indicating that these groups are exposed to poverty in their respective neighborhoods of Apple Valley, more so than other race/ethnicity categories. Mexico is the standout country of origin in areas where the low poverty index indicates higher rates of poverty in the north and central sections of Town.

<u>Victorville.</u> Table 12 indicates that the racial/ethnic groups most affected by the supplied data is the Native American, non-Hispanic (31.71%) population, followed by White, non-Hispanic (22.34%). The lowest poverty index populations are among Asian or Pacific Islander, non-Hispanic (16.33%) and Hispanic (19.23%). Residents with large families with children are in the low poverty index areas as depicted in Map 14.

V.B.iii.1.d.iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas

1 Instructions

Revised (Click for previous text)

Apple Valley. The Town of Apple Valley relies upon the availability of Housing Choice Vouchers provided through the Housing Authority. Unfortunately, the waitlist for Apple Valley is rarely open. This program is also reliant upon landlords to voluntarily choose to accept Housing Choice Vouchers. They are not required to accept a tenant's application for housing if they are not willing to work with the voucher program. According to stakeholder groups, this practice can lead to discrimination based upon source of income.

<u>Victorville.</u> Access to lower poverty areas is limited to residents in Victorville because of the limited opportunities in labor, transportation and education. Although housing is affordable in the Victorville area, residents who are within the lower poverty indexes have fewer opportunities to find higher paying employment. Typically, these households have limited financial resources to travel to better opportunities because they have elected to live in an area where housing is more affordable than other areas within the Region or High Desert. In an effort to create more opportunities for residents, the City of Victorville is making neighborhood revitalization efforts, which are critical to these areas experiencing high poverty levels.

Region.

The Housing Choice Voucher waitlist concerns extend to the entire region with lists for higher poverty areas opening far more regularly, or never closing, while areas that have greater access to opportunity do not open up as often. This limits the choices available to house anyone who may need to apply. For example, if a household wants to locate near other family members for ease of child care, this may be problematic if the family members live in a more desirable area where HCV lists rarely open.

A national problem is also created by the Low Income Housing Tax Credit (LIHTC) programs. Mixed income developments have been identified as a best practice for structuring balance and community within a given housing development. However, with approvals for the LIHTC financing tool being highly competitive, a project is often forced to apply as a 100 percent affordable project. This is a disservice to the residents who will eventually call it their home. Mixed-income projects should be more widely encouraged and rewarded by this program or a continuous cycle of encircling poverty with poverty is further perpetuated.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Environmentally Healthy Neighborhood Opportunities and Patterns in Disparities in Access to Opportunity

V.B.iii.1.e. Environmentally Healthy Neighborhood Opportunities

- Instructions
- Relevant Data

V.B.iii.1.e.i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

Relevant Data

■ Revised (Click for previous text)

Consortia

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. According to Table 12 (Consortia), access to environmentally healthy neighborhoods among all groups is indexed as the highest amongst all assessed opportunities indicators within the Consortia, averaging an index 81 out 100. Indexed at 80, Hispanics were the least likely to have access to environmentally healthy neighborhoods by protected class group.

For the Region, protected classes were more likely to be exposed to environmentally unhealthy neighborhoods. Average index amongst protective classes for the Region was 55. Asian/Pacific Islanders were also least likely to have access to environmentally healthy neighborhoods by protected class group. This lack of access is 13 index points lower than Native Americans who were the most likely

group within the Region to reside in environmentally healthy neighborhoods.

Individual Jurisdictions

Apple Valley. According to Table 12, environmental health does not appear to create any disparity between protected class groups such as Race/Ethnicity, National Origin, or Family Status within the Town of Apple Valley. Furthermore, it does not even appear to adversely influence those who are below the federal poverty line. The range is 63.54 for Native American populations living below the poverty line and 66.34 for White, Non-Hispanic, below the poverty line. The indicator for environmental health falls in between these two numbers for all Race/Ethnicity groups, regardless of poverty level status.

<u>Victorville.</u> Overall Map 15 and Table 12 depict an environmentally healthy jurisdiction. The area with the highest environmental health index is the Southern California Logistics Airport (SCLA), approximately at 80.1 - 90. The Airport was formally known as the George Air Force Base, and is now predominately aerospace, industrial and commercial park. A wastewater treatment facility is located in this area as well. Areas with low environmental health indexes are in the east part of Victorville. The majority of the population in this area is White, Blacks and Hispanics.

V.B.iii.1.e.ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Relevant Data

Revised (Click for previous text)

Consortia

Map 13 shows location of racial/ethnic groups level of exposure to environmental health hazards for the Consortia. Consistent with Table 12 (Consortia), the map doesn't appear to show a significant difference in accessing environmentally healthy neighborhoods based on racial/ethnic groups.

Individual Jurisdictions

Apple Valley. According to Table 12, the lowest environmental indicator is 63.54 for Native American populations living below the poverty line. The indicator for environmental health is relatively high for all Race/Ethnicity groups, regardless of poverty level status, and is far greater within the jurisdiction than the region as a whole.

<u>Victorville.</u> The area with a moderate environmental health index is in the west side of Victorville, which includes the mall and restaurants. The largest population in this area is Hispanic, White and Black. Larger households with children mostly live in the east side of Victorville which has a lower environmental health index.

V.B.iii.1.f. Patterns in Disparities in Access to Opportunity

V.B.iii.1.f.i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.



Revised (Click for previous text)

Consortium

When compared to other Race/Ethnic groups, Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within the Consortia. Of the opportunities measured below, Hispanics were indexed the lowest on average of the seven-categories below.

(Cnsrt-Apple Valley, CONSORTIA) Jurisdiction	CA Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index	Index Average
Total Population								
White, Non-Hispanic	33.43	43.86	18.18	29.14	17.15	53.79	83.01	
Black, Non-Hispanic	24.77	36.74	15.17	29.58	18.83	54.56	80.43	65.02
Hispanic	25.43	36.92	15.37	29.16	17.76	52.37	79.45	64.12
Asian or Pacific Islander, Non-His	panic31.24	39.36	18.85	28.23	16.07	51.84	82.56	67.04
Native American, Non-Hispanic	28.19	41.43	13.18	29.78	18.59	59.89	80.40	67.87

Individual Jurisdictions

Apple Valley. Improvements to schools would be of great benefit to residents in areas with lower access to quality schools within the district. Transit schedules could be more frequent to improve the ability for residents to access better quality employment. Quality job growth, combined with wider offerings of job training programs, are needed for those who have the lowest ability to access other higher education opportunities. Lower-paying retail jobs are accessible but do not pay well and will only perpetuate poverty. Segregation is not an issue in Apple Valley at this time as there are no R/ECAPs. However, opportunity must exist to ensure that poverty does not continue to grow in neighborhoods where it is prevalent already.

<u>Victorville.</u> Similar to the Town of Apple Valley, some disparities in access to opportunities begin with limitations to proficient schools, job proximity, and high cost of transportation. Accesses to greater opportunities are low among all race/ethnicities and familial status.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Additional Information

V.B.iii.2. Additional Information

V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

1 Instructions

During the community meeting transportation was an issue brought up several times. The lack of an effective public transportation system is of major concern to the community. An insufficient public transit affects many protected classes. Lack of more bus routes and short hours affect resident's ability to find and maintain decent employment. For those with disabilities or the elderly, the lack of proper infrastructure prevents them to getting to a bus stop, in turn making them miss critical medical or social service appointments.

V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

Instructions

Revised (Click for previous text)

Apple Valley. During the recent recession, unemployment numbers in the region grew to over 15%, with Apple Valley's hovering around 12%. Moreover, a recent workforce study released by a local municipality revealed that more than 80,000 regional residents commute "down the hill" to areas of Southern California, including Los Angeles, Riverside and Orange counties. These facts reveal a low level of available jobs in Apple Valley and the region as a whole, disproportionately impacting employment opportunities for protected class persons.

<u>Victorville.</u> In March 2014, Victor Elementary school district announced that all 18 elementary schools in the district would be open as "Schools of Choice. This change took effect starting the 2014-2015 school year. This gave parents an opportunity to make a better choice of school for their student to attend within their neighborhood quadrant. This gives children is lower performing an opportunity to attend a higher performing school while still being provided bus service.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Contributing Factors of Disparities in Access to Opportunity

V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Instructions

Revised (Click for previous responses)

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Land use and zoning laws

V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity - Other

Revised (Click for previous text)

The goal of Increasing Access to Opportunity Areas for low income Hispanics located in the Consortia will address the fair housing issues of significant disparities in access to opportunities and segregation. Based on the AFH analysis, Victorville had significant disparities in access to opportunities compared to Apple Valley. This is particularly the case for low-income Hispanics. When compared to other Race/Ethnic groups, Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within the Consortia. Of the opportunities measured, Hispanics were indexed the lowest on average of the seven-categories. Contributing factors to these fair housing issues include, Lack of public investments in specific neighborhoods including services or amenities; Location and type of affordable housing; and. Land Use and Zoning Laws.

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Analysis

V.B.iv.1. Analysis

V.B.iv.1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

- Instructions
- **6** Relevant Data

Revised (Click for previous text)

Consortium

Housing Problems

- For extremely low income households (0-30% AMI), 84% of the Consortia population experienced a housing problem. A disproportionately greater need exists within this category for American Indian/ Alaskan Native, with 100% of population experiencing a housing problem.
- In income categories 30%-50% AMI, Black/African American (92%) as well as American Indian/ Alaskan Native (100%) experienced a disproportionate greater need.
- In income categories 50% -80% AMI, Black/African American (80%) and Asians (75%) experienced a disproportionate greater need, compared to 60% of the population in that income group as a whole.
- Within the 80-100% AMI categories no group experienced a disproportionately greater need.
- It should be noted that only African Americans appeared more than once in income categories as having a disproportionate greater need relating to 1 of 4 housing problems. Conversely, Hispanics was the only racial group not to have a disproportionate need in any income category. Pacific Islanders data was not available.

Severe Housing Problems

- For extremely low income households (0-30% AMI), 77% of the Consortia population experienced a severe housing problem. A disproportionately greater need exists within this category for American Indian/ Alaskan Native, with 100% of population experiencing a severe housing problem.
- In income categories 30%-50% AMI, Black/African American (70%) as well as Asians (79%) experienced a disproportionate greater need.
- In income categories 50% -80% AMI, only Asians (37%) experienced a disproportionate greater need, compared to 60% of the population in that income group as a whole.
- Within the 80-100% AMI categories no group experienced a disproportionately greater need.

Cost Burden

When comparing the jurisdiction as a whole, Whites (48%) and Hispanics (32%) experienced disproportionately greater housing cost burden (Paying 30-50% on housing) than other racial/ethnic groups in the Consortia. However only Whites (39%) are disproportionality effected as it relates to severe cost burden (paying >50% on housing). It should be noted that only Whites have a disproportionate need as it relates to housing cost burden and severe housing cost burden compared to the Consortia as a whole.

Individual Jurisdictions

Apple Valley. For purposes of analysis, housing issues are considered to include four categories: incomplete kitchen facilities, incomplete plumbing facilities, overcrowding, or housing cost burdens that exceed 30% of monthly income. Table 9 was reviewed for any overrepresented Race/Ethnicity categories. Black, Non-Hispanics were by far the highest percentage of the population that has a housing issue(s) with 76.13%. Only representing 8.59% of the population, this shows that housing problems overwhelmingly affect the Black population in the jurisdiction. The next highest Race/Ethnicity experiencing housing was Hispanics with just over half of the population experiencing one or more housing issues. Family households of over 5 people consist of 56.67% of all households with one or more housing issues.

When looking at severe housing problems (that accounts for all other issues previously mentioned except housing cost burden is raised to over 50%), Table 9 continues to show that Black and Hispanic populations have very high rates of housing problems, 42.48% and 34.82%, respectively. When Table 10 is examined just for the Race/Ethnicity of those experiencing this severe housing cost burden alone, it is revealed that the trend of Black and Hispanic populations being most severely affected continues; 38.66% for Black households and 30.56% for Hispanics. However, when cost burden and familial situation is reviewed, non-family households actually have the highest rate of housing costs with 29.50% of the population paying more than 50% of their income to rent or mortgage payments.

<u>Victorville.</u> Table 9 and 10 were examined to determine the highest rates in the above mentioned categories. The race/ethnic group experiencing the highest disproportionate housing needs is among the Black population at 61.89%. This represents households experiencing any four housing issues that include incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room (overcrowding) or cost burden greater than 30%. The lowest population experiencing housing issues is in the Other, non- Hispanic population at 40.80%.

Severe disproportionate housing needs include any four housing issues that include incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room (overcrowding) or cost burden greater than 50%. The race/ethnicity population experiencing severe housing problems is the Native American, non-Hispanic population at 42.86%. The population that falls under the severe housing problems with the lowest percentage is the Other, non-Hispanic population at 24.92%. Families with household's sizes of 5+ experience a disproportionate need at 65.05% of the population.

Severe housing burden is defined as having a housing cost greater than 50% of the household's income. The Black, non-Hispanic population suffer the largest severe housing burden cost at 38.79% Families with a household size of 5 + people experience a severe housing burden cost at 26.05% of the population.

V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

Instructions

Relevant Data

Revised (Click for previous text)

Apple Valley. Though the Town does not have any RECAPs, according to Maps 7 and 8, areas with the greatest housing burdens also overlap with low income areas. This is concerning for the reason that even though these area have the lowest housing costs in the community, many may be substandard rental or aged single-family units with incomplete facilities or, despite the low rents or purchase prices, housing costs may still not be low enough for some households. Within the Jurisdiction, there does not appear to be any correlation between Race/Ethnicity and housing burdens. However, some areas with higher housing burdens are likely to have residents with a National Origin of Mexico. Since Mexico is the highest representation of National Origin in Apple Valley, it makes sense that there would be greater number of this population also represented in areas where housing burdens are most prevalent.

<u>Victorville.</u> Map 7 illustrates the largest area with households experiencing housing burdens falls in the City's R/ECAP area, Census Tract 99.05. The percent of the population in this area is experiencing a housing burden is >63.28% of the area's population. This area is predominantly White (as indicated by the orange dots), Hispanic (as indicated by the blue dots) and Native American (as indicated by the black dots). Map 8 illustrates the national origin of this population. Residents of Mexican (as indicated by the orange dots) origin are the highest population.

The area located within Census Tract 99.08 appears to be <33.33% Households experiencing one more housing burden in the Jurisdiction. This area appears to be White, Non-Hispanic, Black, Non-Hispanic and Hispanic. This area is east Highway 395 north Bear Valley Road, south La Mesa and east Amethyst Road.

V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

- Instructions
- Relevant Data

Revised (Click for previous text)

Apple Valley. Table 11 shows the families with children that live in households that utilize the Housing Choice Voucher program. Nearly half (46.92%) of HCV recipients are families with children. Zero - 1 bedroom units represent 4.45 % (13 households), 2 bedroom units represent 59.25% (173 households), and 32.88% are 3+ bedroom households (96). HCV's are the only form of publicly supported housing available in Apple Valley at this time.

<u>Victorville.</u> Table 11 illustrates the housing needs in publicly supported housing. Households with children represent 73.10% of the families living in publicly supported housing. 15 households in 0 – 1 bedroom units represent 7.61%, 134 households in 2 bedroom units represent 68.02% and 45 households in 3+ units represent 22.84 % of these households.

Households receiving Housing Choice Vouchers (HCV) break down as follows: 74 households in 0-1 bedrooms represents 9.89%, 180 households represent 24.06% in 2 bedrooms units, 476 households in 3+ bedroom units represents 63.64%. Of these households, 462 or 61.76% are households with children.

V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.



Revised (Click for previous text)

Consortia

According to Table 16 (Consortia) below, the largest percentage of home owners and renters by protected class in both the Consortia and Region were Hispanics. Whites were the only group that had a higher percentage of homeowners than renters in both the Consortia and Region. Conversely, Blacks/Non Hispanics was the only group in the Consortia which percentage of renters were more than 5 percent higher than rate of homeownership compared to the population as a whole. While they represented nearly one out of every four renters (21%) in the Consortia, only 9 percent were homeowners.

Table 16 - Homeownership and Rental Rates by Race/Ethnicity

(Cnsrt-Apple Valley, CA CONSORTIA) Jurisdiction (Riverside-San Bernardino-Ontario, CA) Region

	Homeowne	ers	Renters		Homeowners	5	Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	19,060	54.59%	7,415	37.43%	446,425	53.90%	169,245	36.89%
Black, Non-Hispanic	3,250	9.31%	4,185	21.13%	43,075	5.20%	53,295	11.62%
Hispanic	10,770	30.85%	7,095	35.82%	268,520	32.42%	200,830	43.78%
Asian or Pacific Islande Non-Hispanic	r, 1,235	3.54%	705	3.56%	53,205	6.42%	22,550	4.92%
Native American, Nor Hispanic	n- 25	0.07%	100	0.50%	3,275	0.40%	2,590	0.56%
Other, Non-Hispanic	570	1.63%	315	1.59%	13,770	1.66%	10,245	2.23%
Total Household Units	34,915	-	19,810	-	828,270	-	458,755	-

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Individual Jurisdictions

Apple Valley. Housing is 67.1% owner-occupied in Apple Valley according to Census Quick Facts. The location of rentals in Apple Valley is spread evenly through Town, with only a slight dominance in ownership in the farthest west areas of Town bordering the Mojave River.

<u>Victorville</u> has a minimal overcrowding suggesting the City has an adequate supply of larger homes to accommodate larger households. Overcrowded households tend to be those of renters. Unit overcrowding is caused by the combined effect of low earnings and high housing cost.

Region. There was no data located that adequately reflected the most prominent areas where rentals are located through the region. However, the Region has an overall ownership rate of 60.9% for San Bernardino County and slightly higher for Riverside County at 65.9%.

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Additional Information

V.B.iv.2. Additional Information

V.B.iv.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

1 Instructions

<u>Apple Valley.</u> HCV's are only minimally available in Apple Valley as the list for the area rarely opens up to accept interested households to the program. Only 282 vouchers are assisting Apple Valley residents.

The City of Victorville has a large number of Housing Choice Vouchers with 912 vouchers assisting very low and low income residents need their housing needs. The HCV is administered by the County of San Bernardino's Housing Authority.

V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Instructions

Revised (Click for previous text)

Consortia

State law requires jurisdictions to provide for their share of regional housing needs. The Southern California Association of Governments (SCAG) determines the housing growth needs by income category for cities within its jurisdiction, which includes the City of Victorville and Town Apple Valley. Victorville is required to provide adequate sites for the construction of 7,371 new dwelling units during the planning period 2014-21. Of these new units, 1,698 should be affordable to Very Low Income households, 1,207 to Low Income households, 1,342 to Moderate income households, and 3,124 to above moderate income households. The Town of Apple Valley has to construct 3,334 units. Of these, 382 are for Extremely Low income; 382 Very Low Income; 541 Low Income; 622 Moderate Income; and 1,407Above Moderate Income.

Individual Jurisdictions

Apple Valley. With a high senior population in Apple Valley, the Town is looking to expand housing availability to seniors. Community meetings revealed that the unexpected passing of a significant other can drastically reduce the income available to the living spouse. When income decreases and housing costs remain the same, the housing cost burden may no longer be sustainable for the household or there may not be enough funds to make necessary repairs and maintenance on a home. The Town is involved in a 50-unit senior apartment complex with an affordable housing developer to resolve some issues that place extra burdens on seniors. Also, the Town continues to offer the Residential Rehabilitation Loan Program to qualifying Apple Valley homeowners to address health, safety, code issues and necessary repairs.

<u>Victorville</u>. Revitalization efforts are planned for the Old Town area. Assistance will be provided to income qualified residents in form of a loan in order to correct code violations and make curb appeal improvements. This will preserve the existing housing stock. A concern heard during the citizen participation plan was the availability of affordable housing stock for senior citizens. With many baby boomers reaching retirement age and above, many are looking to downsize from their once practical home. Victorville has a limited supply of senior housing.

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Contributing Factors of Disproportionate Housing Needs

V.B.iv.3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Instructions

Revised (Click for previous responses)

Lack of public investments in specific neighborhoods, including services or amenities

V.B.iv.3. Contributing Factors of Disproportionate Housing Needs - Other

Revised (Click for previous text)

As indicated by the analysis, several housing units and neighborhoods in this area are older construction, and require either rehabilitation or conservation to be maintained as viable dwelling units. Within these neighborhoods, Hispanics experienced highest rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the Consortia.

Fair Housing Analysis > Publicly Supported Housing Analysis

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis > Publicly Supported Housing Demographics

V.C.1. Analysis

V.C.1.a. Publicly Supported Housing Demographics

- V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?
 - Instructions
 - Relevant Data
- Revised (Click for previous text)

Consortia

Based on lowest opportunity indicators for categories "low poverty rate" and "access to labor markets", the racial/ethnic groups more likely to be residing in one category of publicly supported are Asians.

Low	Labor	A.,		
Poverty	Market	Average		
Index	Index	Index		

Population below federal poverty line

White, Non-Hispanic	25.44	12.97	38.41
Black, Non-Hispanic	20.41	13.43	33.84
Hispanic	20.67	11.22	31.89
Asian or Pacific Islander, Non-Hispanic	18.45	12.54	30.99
Native American, Non-Hispanic	39.64	19.74	59.38

Individual Jurisdictions

<u>Apple Valley.</u> Housing Choice Voucher programs, operated by the Housing Authority, are currently the only available source of Publicly Supported Housing opportunities in Apple Valley. According to Table

6, HCV serves a disproportionately high rate of Black, Non-Hispanic residents who receive over half of all available vouchers in Apple Valley while only making-up 8.59 % of the Town's population. White, Non- Hispanic residents are underrepresented in the program with only 29.09% of all vouchers assisting their households.

<u>Victorville.</u> Table 6 illustrates the percentage of housing choice vouchers (HCV) distributed throughout Victorville. The highest concentration of HCV is in the west side of the city. This area is predominantly White, Black and Hispanic. Table 7 illustrates housing burden and race/ethnicity. Victorville's R/ECAP Census Tract 99.05 has the highest percent of the population experiencing one or more housing burden. The population in this area is White, Hispanic and Black.

V.C.1.a.ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

- **1** Instructions
- Relevant Data

Revised (Click for previous text)

Apple Valley. As the only source of publicly supported housing in Apple Valley at this time, information concerning only Housing Choice Vouchers is available in Tables 6 and 7. Table 7 reveals that there are 337 households receiving HCV assistance. Of those 337, Table 6 shows that the HCV program serves 53.45% Black, Non-Hispanic residents; over half of all available vouchers. This race makes up only 8.59 % of the Town's population. Meanwhile, Hispanic and White, Non-Hispanic populations are underrepresented in the program, receiving 17.45% and 29.09% of all vouchers, respectively. Hispanic households represent 29.14% of the overall population and White,

non-Hispanics, 55.58%. Though they represent a small percentage of the population (3.17%) no Asian or Pacific Islanders are receiving HCV assistance at this time. Families represent 46.92% of the households receiving assistance under HCV. Seniors receive nearly 20.0% of all vouchers. Recipients with a disability consist of 21.92% of all voucher holders.

<u>Victorville.</u> Table 6 illustrates publicly supported housing residents by race and ethnicity. Residents whose income is 0-30% of the Area Median Income (AMI) are the following: Hispanics have the highest percentage at 37.19, followed by Whites at 28.49% and Blacks at 28.30%. Asian or Pacific Islanders have the lowest percentage of very low income residents at 3.82%. Residents who's AMI is 50% of AMI are as follow: Hispanic have the highest percentage at 34.19%, followed by White at 26.40% and Black at 25.71%. Asian or Pacific Islanders have the lowest percentage of low income residents at 4.15%. Residents who's AMI is 80% of AMI are as follow: Hispanic have the highest percentage at 39.19%, followed by White at 29.53% and Black at 19.94%. Asian or Pacific Islanders have the lowest percentage of median income residents at 4.56%.

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis > Publicly Supported Housing Location and Occupancy and Disparities in Access to Opportunity

V.C.1.b. Publicly Supported Housing Location and Occupancy

V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

- Instructions
- **6** Relevant Data

Map 5 Publicly Supported Housing and Race/Ethnicity

Map 6 Housing Choice Vouchers and Race/Ethnicity

Jurisdictions Map 5 shows that Apple Valley does not have any publicly supported housing units at this time. Map 6 shows that the areas known for a dominant rental market also carry the highest HCV rates in the jurisdiction. These areas are comprised of census tracts 97.16 and 97.10. They have an HCV rate between 7.29% and 11.92% of all housing units in the area. These areas do not have a clear predominance of any race and are well integrated. Apple Valley does not have a R/ECAP to compare these areas to within Town boundaries. Victorville does not have any public housing units. The majority of multi family housing, project based section 8 housing and

low income housing tax credit units are located in the east side of the city. These area have predominantly White population. Ironically, the majority of HCV are not distributed in these areas. They are further south and west of these areas. No publicly supported housing is in Victorville's R/ECAP area.

Consortium Map 5 reveals that within the Consortium boundaries, Victorville alone has both Project-Based Section 8 and LIHTC housing activities. These projects are generally along the I-15 corridor but do not have any identifiable relation to jurisdictional demographic segregation. However, this general population density map reveals that as a whole per the Consortium map, Apple Valley does not equally host these types of public housing projects as does Victorville and in a comparison of regional minority demographics could suggest that Victorville hosts these projects due to its higher minority demographic concentrations. Victorville does have higher density residential zoning options and nearly 50,000 more residents which may attribute to this occurrence more than due to Race/Ethnicity demographic composition.

Map 6 reveals only scattered presence of Housing Choice Vouchers throughout the Consortium area and does not provide a strong correlation to density or stronger presence in any one individual jurisdiction. Poverty-level households are generally concentrated in areas where higher intensity housing (and therefore lower costs) and access to public transportation is more readily available.

V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

- **1** Instructions
- **6** Relevant Data

Apple Valley has no publicly supported housing within the Town boundaries.

Victorville has no publicly supported housing in its R/ECAP area.

V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

- Instructions
- 6 Relevant Data

Apple Valley.

No publicly supported housing exists in Apple Valley and the Town boundaries do not contain R/ECAPs.

	blicly supported housing is in Victorville's R/ECAP area. The demographic composition of the area that rted housing is predominately White, Black and Hispanic.
	ents of public housing, properties converted under the RAD, and LIHTC developments have a significantly osition, in terms of protected class, than other developments of the same category? Describe how these
1 Instructions	
Relevant Data	
Apple Valley. No public Valley and the Town bounds	cly supported housing, properties converted under RAD, or LIHTC developments, currently exist in Apple aries.
mentioned are project-base White – 17%, Black – 53%, follows: White – 7%, Black -	ustrates the demographics of publicly supported housing developments by program category. The projects ed section 8 multifamily units. Sherwood Villas has 101 units with the demographic makeup as follows: Hispanic – 24% and Asian – 2%. Rodeo Drive Apartments has 99 units and the demographic makeup as – 52%, Hispanic 36% and Asian 1%. The demographic makeup of these two complexes are very similar in ifference in White and Hispanic population.
V.C.1.b.iv.(B) Provide additional housing.	I relevant information, if any, about occupancy, by protected class, in other types of publicly supported
3 Instructions	
Relevant Data	
No additional information.	
project-based Section 8, O	raphics of occupants of developments, for each category of publicly supported housing (public housing, other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the the areas in which they are located. Describe whether developments that are primarily occupied by one

race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

- **1** Instructions
- **1** Relevant Data

<u>Apple Valley.</u> The Town of Apple Valley does not currently have any publicly supported housing developments. The one multifamily facility shown in Apple Valley, the Apple Valley Care Center, does not show any available demographic information to analyze.

<u>Victorville.</u> The area that contains most of the publicly supported housing contains other multifamily complexes. These areas tend to have lower income residents. Historically and currently these area have a high Black population although Map 5 depicts the area population to be predominantly White.

Because most senior citizens are on a fixed income, several mobile home parks in Victorville are affordable and residents must income qualify to live in the park. One park in particular is in the north outskirts of town. Fortunately there is a bus stop right in front of the park but the park is located far from any grocery stores or other services. Residents must rely on a car in order to go grocery shopping or medical appointments.

V.C.1.c. Disparities in Access to Opportunity

- V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.
 - Instructions
 - **6** Relevant Data

None of the publicly supported housing primarily serves the senior or disabled population.

The Housing Authority has prioritized serving homeless veterans and their families through programs they offer such as Veterans Affairs supportive services, Supportive services for Veterans Families and the Continuum of Care.

Fair Housing Analysis > Publicly Supported Housing Analysis > Additional Information

V.C.2. Additional Information

V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

6 Instructions

The San Bernardino County Housing Authority received a \$2.41 million renewal grant from HUD in 2015 for its various Continuum of Care programs that serve homeless families and individuals with disabilities. Through the same grant Knowledge and Education for Your Success (KEYS), a non-profit affiliate of the Housing Authority, received \$236,605 for housing navigators. KEYS housing navigators provide families with case management and other support services referrals.

V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

1 Instructions

In an effort to create more housing opportunities for families in the Housing Authorities waiting list, the department implemented a new initiative in April 2015 to transition families who have an annual income which exceeds 80% of the area median income (over income) off of housing assistance. Over income families are given a six month grace period to transition off housing assistance.

Fair Housing Analysis > Publicly Supported Housing Analysis > Contributing Factors of Publicly Supported Housing Location and Occupancy

V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair

housing issue(s) the selected contributing factor relates to. Instructions
Revised (Click for previous responses)
Quality of affordable housing information programs
V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy - Other
Fair Housing Analysis > Disability and Access Analysis
Fair Housing Analysis > Disability and Access Analysis > Analysis
Fair Housing Analysis > Disability and Access Analysis > Analysis > Population Profile
V.D.1. Population Profile
V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?
1 Instructions
Revised (Click for previous text)
<u>Consortia</u>
Based on Maps 14 and 15 (consortia), persons with disabilities are geographically dispersed evenly throughout the Consortia, including R/ECAPs and other segregated areas identified in previous sections.

Individual Jurisdiction

Apple Valley. Map 16 shows that persons with disabilities residing in Apple Valley are geographically dispersed and are not concentrated in any specific area. There are no RE/CAPs in Apple Valley of which to compare to. Despite having a higher percentage of disabled residents across all types of disabilities than the region does, Apple Valley's more densely populated, multi-family areas, that also have higher concentrations of rental housing and low-income persons, do not show any apparent concentration of disabled persons.

<u>Victorville.</u> Map 16 Disability by type notes the disbursement of the population with hearing, vision and cognitive disabilities. A small concentration of disabled individuals resides in the R/ECAP Census Tract 99.05. The largest population has a vision disability. Residents with cognitive disability are mostly located in the southern part of the City. The area has a large number of medical facilities, including heart specialist, physical therapist, dialysis center, imaging, dental, laboratories, urgent care and other specialized medical offices and hospital.

Other amenities within the area are grocery stores, public transit services, banks, clothing stores and restaurants, both sit down and fast food establishments.

V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

- **1** Instructions
- Relevant Data

Revised (Click for previous text)

Consortia

Based on Maps 14 and 15 (consortia), persons with disabilities are geographically dispersed evenly throughout the Consortia, including R/ECAPs and other segregated areas identified in previous sections.

Individual Jurisdiction

Apple Valley. Table 14 shows the age ranges of disabled persons. The largest share of the total population with a disability is 18-64 year olds, who consist of 8.77% of residents. Maps 16 and 17 show that geographic locations of disabled persons do not vary significantly by age range or type of disability. Disabled persons do not appear concentrated in any one area and do not appear to be unable to access housing in any area of the Town boundaries. Community survey response of 8% disabled compares to area population percentage.

<u>Victorville.</u> Map 17 depicts disabilities by age groups. Disabled residents living in the above mentioned area fall in the 5 - 17 age range and 18 - 64 age range. Amenities and human services are available in close proximity to these individuals. The few disabled residents that are over 64 years of age are scattered throughout Victorville.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Housing Accessibility

V.D.2. Housing Accessibility

V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Instructions

Apple Valley. There is potential for an affordable housing project to be developed that will adhere to all ADA requirements necessary to accommodate disabled persons on and around the premises or their individual unit. One phase of the project is tentatively planned as a senior development and may incorporate 100% accessible units for that reason. The second phase is open to all low-income households, but it has not been determined how many units will be reserved as accessible at this time. However, the Town does not currently have any affordable housing units designated for the disabled, or otherwise.

<u>Victorville.</u> Access and affordability are the major housing needs of a disabled person. Physically disabled persons often require specially designed dwellings to permit access within the unit, as well as to and from the property. The disabled, like the elderly have special needs with regard to location. Because of their limited mobility, the disabled often need to live close or have transportation assistance to shopping and medical facilities. Similar to many communities, sufficient accessible and affordable housing in a variety of unit size is limited. In 2011, an affordable apartment complex, consisting of 48 units was built, having varying unit sizes from two to four bedroom units. The complex includes four handicap accessible units that serve disabled individuals and families.

Although Victorville may not have large quantities of accessible and affordable housing units for persons with disabilities, the City's approach to meeting disable needs are as follows:

Senior Home Repair Program (SHRP) – This program is a one-time grant in the amount of \$15,000, of labor and materials for eligible senior or permanently disabled persons. Many residents have benefited from this program by addressing health and safety violations, or simply making ADA improvements. Repairs and improvements vary from roof repair to ramp way installation, restroom modifications, etc.

Owner-Occupied Rehabilitation (OOR) Program – Similar to the SHRP, homeowners who income qualifies may be eligible to receive a low interest deferred loan to make repairs that include ADA improvements or home repairs. Loans may be provided in the amount not to exceed \$25,000.

In addition, the City Adopted a Reasonable Accommodations in Housing to Disabled or Handicapped Individuals Ordinance. The ordinance is to provide a process for individuals with disabilities to make request for, and be provided, reasonable accommodation in the application of zoning regulations to housing.

Region. In speaking of the region on the whole, some community members expressed dissent for the condition of some senior and disabled housing complexes while praising others they have seen. It varies by community, but no comments were provided concerning the size of units or availability.

Affordability is the main concern as it was expressed that nothing is affordable enough for a senior or disabled person who is living on their own or who has lost their spouse, and therefore their Social Security income, after they pass on. This is not acceptable and each community must do what is within their power to ensure adequate housing availability for at-risk groups. The Housing Authority has a waiting list of thousands for Housing Choice Vouchers and affordable housing. Units are limited for all households.

V.D.2.b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

- Instructions
- Relevant Data

Apple Valley. The Town does not have any affordable housing units at this time. There is potential for an affordable housing project to be developed near the intersection of Navajo and Sioux Roads in census tract 97.10. The project will adhere to all ADA requirements necessary to accommodate disabled persons on and around the premises or their individual unit. One phase of the project is tentatively planned as a senior development and is likely to incorporate many accessible units for that reason. The second phase is open to all low-income households, but it has not been determined how many units will be reserved as accessible at this early stage.

The Town has a large availability of multi-family apartment complexes. However, like the majority of all housing stock in the Town boundaries, most were constructed in the 1980's and may not meet requirements established by the Fair Housing Act.

Victorville. The City's affordable housing units are not located within the R/ECAP laying within Census Tract 99.05. However, located within Census Tract 99.04, south from 99.05, and HUD Map 5 (Publicly Supported Housing) is one Public Housing complex known as the Sherwood Villa Apartments, and two low income housing tax credit complexes, Gold West and Summer Breeze. Further north from Census Tract 99.05 is another low income housing tax credit complex known as Northgate Village Apartments. Although, these complexes are close in proximity to the R/ECAP area, the City is overall integrated, including the areas where these complexes are located. Additional, other affordable housing units are scattered throughout the City, but are also in integrated areas. No additional R/ECAPs are located within the City of Victorville.

V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

- Instructions
- Relevant Data

Apple Valley. The Town does not have publicly supported housing options, aside from the HCV program at this time. Of those served by the Housing Authority in Apple Valley, 21.92% are disabled persons.

<u>Victorville.</u> Although the publicly supported housing units are in areas with sidewalks and ADA curb cutouts, including access public transportation, persons with disabilities may encounter the following barriers when trying to obtain publicly supported housing:

- · Ability to access ADA housing may take too long due to long waiting lists;
- · Policies in determining priority placement;
- Providers discriminate against people with disabilities; such as the treatment of people with physical disabilities and people with hearing impairments;
- · Public housing design;
- Policies or procedures requiring the disabled person to make ADA improvements beyond what the policy considers a "reasonable accommodation". The disabled person may not be able to afford the improvements
- ADA improvements one disabled person may need may not be adequate for another (availability of different accessibility features);
- Person who is disabled may not be aware of housing availability
- Lack of disabled units for disabled persons

Fair Housing Analysis > Disability and Access Analysis > Analysis > Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

V.D.3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

<u>Apple Valley.</u> Apple Valley is well integrated and does not appear to have areas where disabled persons reside in concentration of disability. There are Assisted Living Facilities throughout Apple Valley. These also do not appear to be in any concentrated area of the jurisdiction.

<u>Victorville.</u> Currently, the City of Victorville has approximately 15 adult home facilities proving care to disabled individuals. These facilities are licensed to care for up to 77 people. Although, addresses for these facilities are not available to determine if any segregation is apparent, based on the HUD data the City overall appears to be integrated.

Victorville has three assisted living facilities for the elderly. The facilities are located in the Green Tree area and Ridgecrest area of Victorville. The facilities offer independent and assisted living.

Region. There are numerous programs available statewide that aim to further integrate disabled persons:

In-Home Supportive Services (IHSS) is available statewide to qualifying disabled and elderly persons who require basic assistance with errands and doctor appointments in order to stay in their residence to age in place. This program allows persons with disabilities to also remain living with a family member who can be assigned as their caregiver. The caregiver is compensated for the time it takes

to care for the family member, further benefiting the disabled or elderly person so they remain an active part of their family and society instead of being forced to enter a care facility.

California Community Transitions (CCT). California Community Transitions (CCT) is California's Money Follows the Person demonstration to transition long-term residents from long-term care facilities to community environments. CCT lead organizations include Independent Living Centers, Home Health Agencies, Area Agencies on Aging and Multipurpose Senior Services Program providers as well as the Department of Developmental Services. Fifteen lead organizations are currently serving potential demonstration participants in 42 counties. Another seven providers are actively pursuing lead organization status. The Department of Developmental Services serves as lead for all California Community Transitions facilitated by regional centers. Through October 2010, lead organizations and the Department of Developmental Services have supported 286 individuals in their transitions with 244 individuals currently in various stages of transition planning.

V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

Apple Valley. Assisted living facilities for senior or adult disabled persons are available throughout Apple Valley. These vary from large residential care facilities to smaller in-home care facilities for less than 8 persons, depending on the individual state license held. Given the high percentage of disabled persons in Apple Valley, the majority do not live in care facilities. Most remain in their homes under their own care, or the care of a family member. In-Home Supportive Services is an excellent program for qualifying persons to secure a caregiver to fulfill their day-to-day needs. This may be someone that is assigned to them, or a person within their family that is compensated with state minimum hourly wages to care for the individual to which they are assigned for a designated number of hours to which they require care.

<u>Victorville.</u> The adult assisted living housing for disabled or elderly provides an array of services. Most offer 24-hour nursing, support groups, diabetic management, assisted living, memory care, and respite care. These facilities are within proximity of three major hospitals, two of which are within the City of Victorville, and the other in Apple Valley. Because of the amenities and services provided by these adult living facilities, some persons with disabilities may not be able to afford these housing facilities. Many, seniors or persons with disabilities are on limited incomes and choose to rent a home.

For those seniors or disable persons who own their homes, such as a mobile home, the City's Senior Home Repair Program assists them make modifications and improvements to their homes so that they live in a safe and accessible environment. The SHRP is a \$15,000 one-time grant program and has assisted over 300 seniors or persons who are permanently disabled. In addition, the City has allocated funding to Victor Valley Community Services Council to assist low-income seniors make minor home repairs.

As previously mentioned, the County of San Bernardino administers human services such as WIC, Cal-Fresh, Medi-Cal and other assistance based programs. Satellite offices have been opened in Victorville, Hesperia and Adelanto so residents do not have to travel to San Bernardino, which is a 40 minute drive by car. Public transportation is available to and from these offices.

The Department of Aging and Adult Services (DAAS) is a San Bernardino agency is dedicated to helping seniors and at risk individuals to improve or maintain choice, independence and quality of life. DAAS offers an array of services, such as Adult Protective Services, Family Caregiver Support Program, In-Home Supportive Services, Health Insurance Counseling and Advocacy Program, Nutrition and Provider Services, and the Multipurpose Senior Services Program. The purpose of these programs is to ensure seniors and adults with disabilities have the right to age in place in the least restrictive environment.

The Multipurpose Senior Services Program, for instance, works to avoid or delay the inappropriate placement of persons in nursing facilities while fostering independent living in the community. The Family Caregiver Support Program was created by the Title III-E of the Older Americans Act to serve caregivers (spouses, daughters, sons, grandparents, etc.,) that have been providing care on an informal basis. The In-Home Supportive Services is a federal, state and locally funded program designed to help pay for services provided to seniors so that they can remain safely in their own homes. Some services include housecleaning, meal preparation, laundry, grocery shopping, etc. These are a just a few examples of options for disabled and adult persons in Victorville.

Region. According to the State of California's Olmstead Plan, the following programs are available statewide:

Independent Living Centers. The State Independent Living Plan identifies transition services as part of its 2010-2013 priorities. Approximately \$150,000 is allocated annually for independent living centers to provide necessary services to individuals they are assisting to transition to the community, limited to \$4,000 per individual. Individuals served do not need to be on Medi-Cal. These efforts funded by the Rehabilitation Act, Title VIIB, have transitioned hundreds of people with disabilities back to community living. 5 Mental Health Services Act Housing Program. The Department of Health Care Services and the California Housing Finance Administration jointly administer the Mental Health Services Act Housing Program. This program is funded by revenue from the state Mental Health Services Act (passed by California voters as Proposition 63 in 2004) for the development, acquisition, and rehabilitation of permanent supportive housing for individuals with mental illness and their families, especially homeless individuals with mental illness and their families. Approximately \$400 million in Mental Health Services Act funding has been set aside for this program

California Community Choices (Choices). California Community Choices (the Choices project) was housed at the California Health and Humane Services Agency, Office of the Secretary and was fully funded. It focused on developing California's long-term care infrastructure to increase access to home and community-based services and to help divert persons with disabilities and older adults form unnecessary institutionalization. Funding supported infrastructure development, including development of a pilot website, CalCareNet, a "one-stop shop" for information about long-term services and supports, features regional services in Riverside County, as well as statewide information about licensed care facilities and alcohol and drug programs. The site provides general education and tips for anyone seeking information about long-term services and supports.

The California (Medi-Cal) Working Disabled Program. The Department of Health Care Services established the 250 Percent Working Disabled Program, effective April 1, 2000. This program allows employed individuals with disabilities to earn up to 250 percent of the federal poverty level in countable income and maintain Medi-Cal eligibility by paying a monthly premium. A Medicaid Infrastructure Grant has supported outreach and education so that people with disabilities receiving critical Medi-Cal long-term services and supports are aware they can work and earn incomes above poverty levels without losing eligibility.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Disparities in Access to Opportunity

V.D.4. Disparities in Access to Opportunity

V.D.4.a. To what extent are persons with disabilities able to access the following?

Identify major barriers faced concerning:

i. Government services and facilities

- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
- iii. Transportation
- iv. Proficient schools and educational programs
- v. Jobs

i. Government services and facilities

Apple Valley - Reasonable Accommodation

In accordance with the federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act ("Acts"), it is the purpose of this Section to provide individuals with disabilities *reasonable* accommodation in the application of the Town of Apple Valley's regulations, policies, practices, and procedures, as necessary to allow disabled persons to use and enjoy a dwelling. This Section provides a process for individuals with disabilities to make requests for, and to be provided, *reasonable* accommodation from the various Town regulations, policies, practices, and procedures, including zoning and land use regulations, when *reasonable* accommodation is warranted based upon sufficient evidence.

<u>Victorville.</u> Fair Housing Accessibility Standards and California Administrative Code Title 24 sets forth access and adaptability requirements for the physically handicapped (disabled). These regulations apply to public building such as hotels, employee housing, factory built housing and privately funded newly constructed apartment complexes containing five or more units. The regulations require that ramp ways, larger door widths, restroom modifications, etc. be designed to enable free access.

In accordance with the Americans with Disabilities Act, special assistance to participate in meetings or events held in government facilities, reasonable accommodations may be made. A 48-hour advanced notice is request prior to accessing the facility.

i. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

<u>Apple Valley.</u> Historically a low density rural area, infrastructure improvements until recently have not been required. New commercial and residential areas as well as rebuilt roads include curb, sidewalks, gutter and drainage. Accessibility improvements are being included or added as well.

<u>Victorville.</u> As previously mentioned, Victorville still has a large amount of areas with no sidewalks. This makes it difficult for disabled and senior citizens to safely get around independently. Only a number of cutouts have the sensory bumps. The City is in the process of completing its Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan. The City has contracted with Disability Access Consultants (DAC) to conduct a review of City buildings and parks, and public rights-of-way. The study includes accessibility requirements for Americans With Disabilities, Caltrans requirements, California Manual on Uniform Traffic Control Devices (CAMUTCD) and the Public Right-of-Way Accessibility Guidelines (PROWAG).

i. Transportation

Apple Valley. Victor Valley Transit Authority provides disabled individuals with Dial-A-Ride services to get them to and from appointments and also a Sunday Delivery program that actually takes them on a direct route to where they need to go. Routes that take a half to a full-day to navigate a person where they need to go, are not always sufficient for the needs of the elderly and disabled.

<u>Victorville.</u> Transportation has been an issue for disabled individuals in Victorville, Schedules and transfers make to and from major human services difficult. Residents express that many times an appointment will take all day because of the travel time.

Victor Valley Transit Authority (VVTA) offers complementary fixed route bus service to individuals who meet the Americans With Disabilities Act requirements and are certified. Low-cost curb to curb service is also offered. VVTA Transit Ambassadors assist seniors and person with disabilities by providing travel assistance to those that are new to the fixed-route service.

The Victor Valley Community Services Council provides free transportation to low income senior citizens and disabled persons. This service provider is funded through the City of Victorville in assisting seniors with emergency minor home repairs.

The Orenda Foundation provides military veterans assistance, including 12 step recovery, employment and transportation services for Veterans with disabilities.

The Family Resource Center works with at-risk youth by providing mental, sociological and educational services, including transportation services.

Foothill AIDS Project provides education, support and transportation services for those with HIV-AIDS.

i. Proficient schools and educational programs

Apple Valley. Local public and charter schools are eligible for Intradistrict Transfer Requests via Apple Valley Unified School District.

<u>Victorville.</u> With the introduction and implementation of the School of Choice program in the elementary school district, parents are able to choose a school that falls within their geographical area. Transportation is provided to the students. A bus route is available to the community college.

i. Jobs

<u>Victorville.</u> The U.S. Department of Labor, Bureau of Labor Statistics, states that many persons with a disability who were not working reported some type of barrier to employment. Lack of education or training, lack of transportation, the need for special features at the job, and a person's own disability were just a few examples mentioned. Additionally, persons who were employed but are disabled experienced some form of difficulty in completing their job duties.

V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Apple Valley. In accordance with the federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act ("Acts"), it is the purpose of this Section to provide individuals with disabilities *reasonable* accommodation in the application of the Town of Apple Valley's regulations, policies, practices, and procedures, as necessary to allow disabled persons to use and enjoy a dwelling. This Section provides a process for individuals with disabilities to make requests for, and to be provided, *reasonable* accommodation from the various Town regulations, policies, practices, and procedures, including zoning and land use regulations, when *reasonable* accommodation is warranted based upon sufficient evidence.

<u>Victorville.</u> In August 2006, the City adopted a Reasonable Accommodations in Housing to Disabled or Handicapped Individuals Ordinance. The purpose of this ordinance is to provide a process for individuals with disabilities to make a request for, and be provided, reasonable accommodation in the application of zoning regulations to housing. This ordinance will comply with Fair Housing

Laws, and is administered by the City Development Department.

V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

Apple Valley. Aging housing stock does not often have accessible design elements. Purchasing a home and then being required to spend thousands of dollars on remodeling costs can be out of reach for any new homeowner, let alone a disabled person on a fixed income.

<u>Victorville.</u> Physical and mental disabilities can hinder access to housing units of conventional design as well as limit the ability of the disabled individuals to earn an adequate income in order to purchase and maintain a house.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Disproportionate Housing Needs

V.D.5. Disproportionate Housing Needs

V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

- Instructions
- **6** Relevant Data

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

According to HUD data from Table 1, 34 percent of the Apple Valley population have one or more disabilities. Special housing needs for persons with disabilities fall into two general categories: physical design to address mobility impairments and in-home social, educational, and medical support to address developmental and mental impairments.

Oftentimes, disabilities present an employment obstacle, making it difficult for the disabled to earn adequate incomes. Since the majority of the disabled population relies on fixed monthly disability incomes that are rarely sufficient to pay market rate rents, supportive housing options, including group housing and shared housing, are important means for meeting the needs of persons with disabilities. Such housing options typically include supportive services onsite to also meet the social needs of persons with disabilities. According to the State Community Care Licensing Division, there are 26 residential care facilities for adults and 15 residential care facilities for the elderly in the Apple Valley area for a total of 41 residential care facilities with a combined capacity of 424 persons.

<u>Victorville.</u> People with disabilities tend to be on a limited fixed income. Lower income residents may have to pay for more than they can afford causing severe housing burden or live in substandard housing.

Fair Housing Analysis > Disability and Access Analysis > Additional Information

V.D.6. Additional Information

V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

1 Instructions

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

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

<u>Victorville.</u> People who use wheelchairs, scooters and other mobility aids often find that some government facilities have parking, routes to and through buildings, high service counters and restrooms that are not accessible. Die to physical barriers, some people with mobility impairments may have to rely on others to assist them when transacting their business or they may not participate in activities in which they would otherwise be interested.

V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.

Instructions

<u>Apple Valley.</u> Acknowledging the aging housing stock in the Town boundaries, a Residential Rehabilitation Loan Program (RRLP) is available to low-income qualifying homeowners for health, safety, and code repairs; including modifications for accessibility concerns for the . This program is in operation town-wide and does not restrict assistance to any area of our boundaries.

<u>Victorville.</u> The City is currently preparing a study of all the accessibility deficiencies in the jurisdiction. This study includes all public facilities and infrastructure. Once the study is completed, the City will assess the deficiencies and begin addressing them. Residents have long voice their concern over lack of sidewalks in the city.

Fair Housing Analysis > Disability and Access Analysis > Disability and Access Issues Contributing Factors

V.D.7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- 1 Instructions
- Revised (Click for previous responses)
 - V.D.7. Disability and Access Issues Contributing Factors Other
- Revised (Click for previous text)

Lack of local private fair housing outreach and enforcement:

Lack of local private fair housing outreach and enforcement as well as private discrimination are a contributing factor of high priority because of its significant effect on fair housing choice for all protected groups. However, fair housing complaints by individuals with a disability seem to be disproportionately higher than other protected groups.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Analysis

V.E.1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

1 Instructions

Apple Valley. The Town of Apple Valley has not received any charge or letter of finding form HUD or from any state or local fair housing agency, or Department of Justice lawsuits.

<u>Victorville.</u> The City of Victorville has not had any findings from HUD concerning violations of civil rights-related laws, or determinations from a substantially equivalent state or local fair housing agency concerning fair housing law.

V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?

1 Instructions

The Federal Fair Housing Act of 1968 and Amendment Act of 1988 prohibit discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions on the basis of any of the following criteria's, also known as "protected categories": race or color, religion, national origin, familial status, disability or age.

There are several Acts that expand on the prohibition of discrimination based on disability in any federal funded program or activity (Section 504 of the Rehabilitation Act of 1973). The Civil Rights Act of 1964 also prohibits discrimination on the basis of race, color or national origin in federally funded or assisted programs or activities. The Americans with Disabilities Act of 1990 prohibits the discrimination based on disability in programs, services, and or activities provided or made available by any public entity. The Age Discrimination Act of 1975 also prohibits the discrimination of the basis of age in programs or activities receiving federal financial assistance.

California fair housing protection laws are expanded in the state by codes that incorporate additional protected classes beyond Federal. For instance, the State of California uses the terms disabled and disability as opposed to the federal terms of handicap and handicapped. Primary fair housing laws are the California Fair Employment and Housing Act (FEHA) and the Unruh Act. A significant difference between Federal fair housing laws and State of California is that FEHA covers the following protected classes from discrimination:

- Ancestry
- Marital status
- · Sexual orientation
- Source of income
- Age
- Arbitrary (Unruh)

In addition, the FEHA prohibits discrimination and harassment in areas of housing, such as: (1) sales and rentals, (2) evictions; (3) terms and conditions, (4) mortgage loans, (5) insurance, (6) land use and zoning, (7) housing providers are required to make reasonable accommodation in rules and practices to permit individuals with disabilities to use and enjoy a dwelling and make reasonable modifications to the premises, and (8) retaliation against any person that has filed a complaint with the State, has participated in a Department investigation or has opposed any activity illegal under the FEHA is prohibited

Unruh Civil Rights Act protects against discrimination by any business, housing and public accommodations based on (1) age, (2) ancestry, (3) color, (4) disability, (5) national origin, (6) political affiliation, (7) position in a labor dispute, (8) race, (9) religion, (10) sex, (11) sexual orientation and (12) source of income.

FEHA also prohibits discrimination in all areas of housing (rental, lease, terms and conditions, etc.) because of the presence of children in the household (familial status). Familial status is having one or more individuals under 18 years of age living with a parent or another individual having legal custody of that individual (including foster parents) or with a designee of the parent or legal custodian. This status also includes pregnant women and individuals in the process of adopting or otherwise securing legal custody of any minor under 18 years of age.

V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

1 Instructions

The California Department of Consumer Affair provides information on fair housing. The Department provides assistance in unlawful discrimination, resolving housing discrimination problems, and resources to organizations and associations that can assist with complaints or investigations. California Department of Fair Employment and Housing investigates complaints of unlawful discrimination (http://www.dca.ca.gov/publications/landlordbook/glossary.shtml#discrimination) in housing and employment.

The Legal Aid Association of California also maintains a directory of legal aid organizations at www.calegaladvocates.org (http://www.calegaladvocates.org/).

Legal aid organizations at www.calegaladvocates.org/ organizations (http://www.dca.ca.gov/publications/landlordbook/glossary.shtml#legalaidorganizations) provide free legal advice, representation, and

other legal services in noncriminal cases to economically disadvantaged persons. Legal aid organizations are located throughout the state.

Local government agencies, such as the City of Victorville and Town of Apple Valley, provide fair housing information, outreach and enforcement resources through its contractor Inland Fair Housing and Mediation Board (IFHMB). IFHMB provides fair housing, mediation, housing counseling, alternative dispute resolution, senior services program, and many other services.

The National Fair Housing Alliance (NFHA) provides education and outreach conferences, workshops and in-service training programs to provide solutions for combating housing discrimination. NFHA and its member organizations conduct national and regional investigations of discriminatory rental, sales, lending and insurance policies and practices. This Alliance also provides confidential consulting, training and compliance services to rental housing providers, real estate companies, mortgage lenders, homeowner's insurance companies and governmental agencies. Membership services are also available for technical support and enforcement.

The US Department of Housing and Urban Development (HUD) enforces the federal fair housing law, which prohibits discrimination based on sex, race, color, religion, national origin, familial status, and handicap (disability). To contact HUD, look in the white pages of the phone book under United States Government Offices, or visit their web site (http://portal.hud.gov/hudportal/HUD).

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Additional Information

V.E.4. Additional Information

V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

Fair Housing enforcement organizations engage in activities that promote housing choice, advocate for antidiscriminatory housing policies, undertake initiatives to build inclusive communities, and provide fair housing training and education. The Town of Apple Valley and City of Victorville strive to encourage and support local agencies that promote and advocate for fair housing choice. Since receiving its Entitlement status of CDBG funds, the City of Victorville has funded Inland Fair Housing & Mediation Board to carry out and support its citizens through any housing discrimination. IFHMB enforces the federal and state fair housing acts through investigations, testing, and implementation of strategies and structures of federal and state regulations.

V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The City of Victorville and Town of Apple Valley planning approach to "take meaningful action" to overcome historic patterns of segregation, promote fair housing choice, and cultivate communities that are free from discrimination beginnings with establishing a standardized fair housing assessment and planning process through this AFH plan.

Through the AFH process, the Jurisdictions will identify and examine fair housing issues and contributing factors that cause disparities in housing needs and in community opportunities. Goals and priorities that are set by the Consortium will be incorporated into the Con Plan and future AFH. Public participation will be part of the development of the AFH.

Strategies such encouraging the development of expansion of affordable housing in areas of opportunity, encourage community revitalization through place-based strategies, and continue the preservation of existing affordable housing will promote and maximize fair housing.

Access and affordability are major housing needs of a disabled person.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Instructions
- Revised (Click for previous responses)

Lack of local private fair housing outreach and enforcement

V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors - Other

Revised (Click for previous text)

Lack of local private fair housing outreach and enforcement as well as private discrimination are a contributing factor of high priority because of its significant effect on fair housing choice for all protected groups. However, fair housing complaints by individuals with a disability seem to be disproportionately higher than other protected groups.

Fair Housing Goals and Priorities > Prioritization of Contributing Factors

VI.1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to

opportunity, or negatively impact fair housing or civil rights compliance.

1 Instructions

Revised (Click for previous text)

Fair Housing	Contributing	<u>Priority</u>	Justification
<u>Issue</u>	<u>Factors</u>	<u>Tionty</u>	<u>Justinication</u>
violations of civil	Lack of local private fair housing outreach and enforcement		Lack of local private fair housing outreach and enforcement as well as private discrimination are a contributing factor of high priority because of its significant effect on fair housing choice for all protected groups. However, fair housing complaints by individuals with a disability seem to be disproportionately higher than other protected groups. This issue is high priority because fair housing services have assisted an array of Consortia residents who are of protective class and those that are low income. Many Consortia residents have received 'one-on-one' assistance in assisting homeowners who are at risk of losing their home by exploring many available options including loan modification, special forbearance, partial claims, loan repayment plans, loan reinstate plans, short sale options including the Homeowner Assistance Foreclosure Alternative (HAFA), and the Homeowner Assistance Refinance Program.
_	Contributing Factors	<u>Priority</u>	Justification

Racially or ethnically concentrated areas of poverty (R/ECAPs) in the jurisdiction and region.	Lack Community Revitalization Strategies Hi Lack of public investments in specific neighborhoods, including services or amenities	gh	Improve the housing condition and access to social services within the Consortia's R/ECAP has been selected as a high priority. As indicated by the analysis, several housing units and neighborhoods in this area are older construction, and require either rehabilitation or conservation to be maintained as viable dwelling units. Within these neighborhoods, Hispanics experienced highest rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the Consortia. The poverty rate of this area which disproportionately effects Hispanics also necessitates a high priority. The Consortia will use CDBG funding to fund social service agencies and programs to assist in reducing the poverty level of residents within the R/ECAP.
Fair Housing	Contributing Factors	<u>Priority</u>	<u>Justification</u>
Segregation	Lack of publi investments i specific neighborhoods, including service or amenities	n	According to AFH maps used in the analysis, from 1990 to 2000, the Consortia's Racial/Ethnic demographics were primarily Whites and Hispanics, and integrated. However, from 2000 to 2010, a clear lack of integration by Hispanics in the Consortia's eastern and higher opportunity neighborhoods existed.
Significant disparities in access to opportunities	housing		Lack of integration was a pattern that took shape over a decade long period. The Consortia understands that achieving significant results will require prolong efforts (i.e., mobility programs, land use assessments, etc,) beyond the 5-year planning period. Therefore, this goal has
	Land Use an Zoning Laws	d	been assigned a moderate priority.

Lack of public investments in specific neighborhoods, including services or amenities

Land use and zoning laws

Location and type of affordable housing

The data show that Victorville has accommodated the majority of the Consortium's population growth, and Victorville is providing a broader range of housing choices. This appears to be a major factor contributing to the existing pattern of segregation between the two jurisdictions and, given the demographic shifts in the county and region over the past couple decades, it seems likely to become exacerbated if the current situation doesn't change (Location and type of affordable housing- Contributing Factor).

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Contributing Factors of R/ECAPs

Lack of community revitalization strategies

Lack of public investments in specific neighborhoods, including services or amenities

Lack of Community Revitalization Strategies

The Consortia has a small R/ECAP area, which is included in a much larger R/ECAP containing unincorporated areas of San Bernardino County. The R/ECAP only includes Census Tracts 99.05 which is within Victorville's geographical boundaries. The Consortia's knowledge of the R/ECAP as it relates to the housing and social service needs of the area is limited. In fiscal year 2017-18, The Consortia will perform a community assessment to better understand the needs of the area which will lead to strategic investments using CDBG and HOME funding.

Lack of public investments in specific neighborhoods, including services or amenities

A significant number of low income residents have expressed financial hardship that prevents them from correcting code violations, specifically connecting their failing septic system to the City's sewer system. In an attempt to remove the R/ECAP that incorporates Census Tract 99.05, the Consortia will utilize HOME funding and other housing programs to remove barriers that prevent people from accessing affordable housing. For instance, the City of Victorville's Residential Code Correction loan program is meant to assist property owners, owner occupied and rental property, to correct code violations.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Contributing Factors of Disparities in Access to Opportunity

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Land use and zoning laws

The goal of Increasing Access to Opportunity Areas for low income Hispanics located in the Consortia will address the fair housing issues of significant disparities in access to opportunities and segregation. Based on the AFH analysis, Victorville had significant disparities in access to opportunities compared to Apple Valley. This is particularly the case for low-income Hispanics. When compared to other Race/Ethnic groups, Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within the Consortia. Of the opportunities measured, Hispanics were indexed the lowest on average of the sevencategories. Contributing factors to these fair housing issues include, Lack of public investments in specific neighborhoods including services or amenities; Location and type of affordable housing; and. Land Use and Zoning Laws.

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Contributing Factors of Disproportionate Housing Needs

Lack of public investments in specific neighborhoods, including services or amenities

As indicated by the analysis, several housing units and neighborhoods in this area are older construction, and require either rehabilitation or conservation to be maintained as viable dwelling units. Within these neighborhoods, Hispanics experienced highest rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the Consortia.

Fair Housing Analysis > Publicly Supported Housing Analysis > Contributing Factors of Publicly Supported Housing Location and Occupancy

Quality of affordable housing information programs

Fair Housing Analysis > Disability and Access Analysis > Disability and Access Issues Contributing Factors

Lack of local private fair housing outreach and enforcement:

Lack of local private fair housing outreach and enforcement as well as private discrimination are a contributing factor of high priority because of its significant effect on fair housing choice for all protected groups. However, fair housing complaints by individuals with a disability seem to be disproportionately higher than other protected groups.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Lack of local private fair housing outreach and enforcement

Lack of local private fair housing outreach and enforcement as well as private discrimination are a contributing factor of high priority because of its significant effect on fair housing choice for all protected groups. However, fair housing complaints by individuals with a disability seem to be disproportionately higher than other protected groups.

Fair Housing Goals and Priorities > Fair Housing Goals

VI.2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Instructions

Revised (Click for the previous goal)

Goal

Improve the housing condition and access to social services within the Consortia's R/ECAP (Racially or Ethnically Concentrated Areas of Poverty)

Contributing Factors

- Lack Community Revitalization Strategies
- Lack of public investments in specific neighborhoods, including services or amenities

Fair Housing Issues

Racially or ethnically concentrated areas of poverty (R/ECAPs) in the jurisdiction and region.

Metrics, Milestones, and Timeframe for Achievement

- During the first year of the ConPlan implementation period, the Consortia will conduct a R/ECAP Needs Assessment and Action Plan to better understand the current housing and social service needs of the area. A baseline for improvement will also be established.
- By the 2rd year of the ConPlan implementation period, the Consortia will program HOME funding to provide a Residential Rehabilitation Loan Program to qualifying R/ECAPs homeowners to address health, safety, code issues and necessary repairs. This programming will continue in years 3 to 5 based on funding availability.
- By the 2rd year of the ConPlan implementation period, the Consortia will program CDBG funding to address social service needs within the R/ECAPs. This programming will continue in years 3 to 5 based on funding availability.
- Starting in year 3, the Consortia will conduct an annual assessment of the impact of HOME, CDBG and other investment within the R/ECAP area based on baseline data established in year 1.

Responsible Program Participant(s)

Apple Valley, CA Victorville, CA

Discussion

- Racially or Ethnically Concentrated Area of Poverty, R/ECAP, means a geographic area with significant concentrations of poverty and minority populations. The rule does not define "significant" or give metrics. However, the proto-type mapping system demonstrated by HUD suggests that R/ECAPs will be outlined on maps and provided in data tables.
- · Lack of Community Revitalization Strategies

The Consortia has a small R/ECAP area, which is included in a much larger R/ECAP containing unincorporated areas of San Bernardino County. The R/ECAP only includes Census Tracts 99.05 which is within Victorville's geographical boundaries. The Consortia's knowledge of the R/ECAP as it relates to the housing and social service needs of the area is limited. In fiscal year 2017-18, The Consortia will perform a community assessment to better understand the needs of the area which will lead to strategic investments using CDBG and HOME funding. The objective is to show an improvement in the housing and social service needs of the area prior to the end of the 5 year ConPlan period.

Lack of public investments in specific neighborhoods, including services or amenities

In an attempt to remove the R/ECAP that incorporates Census Tract 99.05, the Consortia will utilize HOME funding and other housing programs to remove barriers that prevent people from accessing affordable housing. For instance, the City of Victorville's Residential Code Correction loan program is meant to assist property owners, owner occupied and rental property, to correct code violations. A significant number of low income residents have expressed financial hardship that prevents them from correcting code violations, specifically connecting their failing septic system to the City's sewer system. The newly developed program will assist property owners with these delayed repairs.

Revised (Click for the previous goal)

Goal

Goal

Increase Access to Opportunity Areas for low income Hispanics located in the Consortia.

Contributing Factors

- · Lack of public investments in specific neighborhoods, including services or amenities
- · Location and type of affordable housing
- · Land Use and Zoning Laws

Fair Housing Issues

- Segregation
- Significant disparities in access to opportunities

Metrics, Milestones, and Timeframe for Achievement

- Within the 1st year of the ConPLan implementation period, the Consortia will work with the Inland Fair Housing and Mediation Board (IFHMB) to create a Mobility Counseling program which will include a range of options including, working with first-time HCV holders that currently reside in a neighborhood with a poverty level greater than 30 percent to locate to a higher opportunity area within the Consortia.
- Starting Year 2, the Consortia will track mobility counseling outcomes by tracking the percentage of households receiving counseling who successfully move to higher opportunity areas. This metric will help the Consortia & IFHMB determine whether the program is effective at meeting the goal of increase levels of integration by Hispanic residents within higher opportunity neighborhoods. A high rate of successful moves could lead to expanding the program, while a low rate of successful moves might indicate the need to change the counseling curriculum or investigate what other factors pose barriers to integration.
- By year 2, work with IFHB to provide testing of multifamily housing market in higher opportunity neighborhoods and census tracts to determine levels of discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.
- By the end of the 2nd year of the ConPlan period, the Consortia will conduct an Assessment to studying the issue & impact of public policy relating to barriers to certain households (i.e protected class) in Apple Valley. The result will be an Action Plan to increase affordable housing stock with in the jurisdiction.

Responsible Program Participant(s)

Apple Valley, CA Victorville, CA

Discussion

The goal of Increasing Access to Opportunity Areas for low income Hispanics located in the Consortia will address the fair housing issues of significant disparities in access to opportunities and segregation. Based on the AFH analysis, Victorville had significant disparities in access to opportunities compared to Apple Valley. This is particularly the case for low-income Hispanics. When compared to other Race/Ethnic groups, Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within the Consortia. Of the opportunities measured, Hispanics were indexed the lowest on average of the seven-categories. Contributing factors to these fair housing issues include, Lack of public investments in specific neighborhoods including services or amenities; Location and type of affordable housing; and. Land Use and Zoning Laws.

Fair Housing Issues:

<u>Segregation</u>

- The data show that Victorville has accommodated the majority of the Consortium's population growth, and Victorville is providing a broader range of housing choices. This appears to be a major factor contributing to the existing pattern of segregation between the two jurisdictions and, given the demographic shifts in the county and region over the past couple decades, it seems likely to become exacerbated if the current situation doesn't change (Location and type of affordable housing- Contributing Factor).
- The AFFH data show that Between 1990 and the present, Victorville has accommodated 73% of the Consortium's population growth. During that same time, Victorville has accommodated even higher shares of certain protected class groups in the Consortium, including:
 - 77% of black population growth in the Consortium
 - 75% of Hispanic population growth in the Consortium
 - 83% of foreign-born population growth in the Consortium
 - 85% of LEP population growth in the Consortium
 - 86% of Consortium's growth in the number of households with children
- RHNA production over the previous Housing Element cycle shows that Victorville did a much better job expanding housing supply. During the previous cycle, Victorville's allocation was over half of the Consortium's, and produced over 80% of the units in its allocation. Apple Valley met 50% of its much smaller target. 85% of the multifamily housing added to the Consortium during that time was built in Victorville as well, which is a significant reason why Victorville is home to over 60% of renters in the Consortium, and over 70% of HCV-assisted households (Location and type of affordable housing- contributing factor).
- Since we see that population growth in the region overall is increasingly comprised of minority ethnic groups and other protected classes, it is no surprise that accommodating population growth will lead to more diversity. We also expect to see growth in parts of the population that, in the Inland Empire, are more likely to rent and disproportionately earn lower incomes. If these trends in housing supply don't change, the racial/ethnic divide between the cities seems likely to deepen. The Consortia is committed studying the issue & impact of public policy relating to the barriers to certain households in AV. (Land Use and Zoning Laws- Contributing Factor)
- Significant disparities in access to opportunities

Significant disparities in access to opportunities means substantial and measurable differences in access to education, transportation, economic, and other important opportunities in a community, based on protected class related to housing. When compared to other Race/Ethnic groups, Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within the Consortia. Of the opportunities measured, Hispanics were indexed the lowest on average of the seven measured categories (Lack of public investments in specific neighborhoods, including services or amenities- Contributing Factor)

Milestones and Metrics

The Consortia will implement a Mobility Program which will assist to reduce barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. A focus of the program will be low income Hispanics and housing choice voucher holders.

To buttress the program, IFHMB will provide testing in FY 18-19 of multifamily housing market in higher opportunity neighborhoods and census tracts to determine levels of discrimination or other barriers to mobility.

Revised (Click for the previous goal)

Goal

Goal

Continue to provide fair housing services within the consortia with an emphasis on reducing the number of fair housing complaints based on disability

Contributing Factors

Lack of local private fair housing outreach and enforcement

Fair Housing Issues

Evidence of illegal discrimination or violations of civil rights laws, regulations, or guidance.

Metrics, Milestones, and Timeframe for Achievement

- Within the 1st year of the ConPLan implementation period, the Consortia will work with the IFHMB to implement a targeted campaign of engaging housing providers and tenants in the Consortia with education and outreach materials to address the issue.
- Annually, the Consortia will review fair housing complaints based on disabilities to determine annual reductions as measured by 2016 levels.

Responsible Program Participant(s)

Apple Valley, CA Victorville, CA

Discussion

The Consortia provides fair housing information, outreach and enforcement resources through its contractor Inland Fair Housing and Mediation Board (IFHMB). IFHMB provides fair housing, mediation, housing counseling, alternative dispute resolution, senior services program, and many other services.

Based on fair housing data, disparities may exist in the Consortia for groups of the disability protected characteristic. For example, Apple Valley saw an increase of 114% in reported disability discrimination cases from 2011 to 2015. During this 5-year planning period, the Consortia will continue to contract for fair housing services with an emphasis of reducing the number of fair housing complaints based on disabilities to determine annual reduction as measured by 2016 levels.

Documents

File		Description	Uploaded	User
Fair Housing Goals and Priorities Table Valley.pdf (/Afh/Document/View/494)	e, Apple	Appendix A - Fair Housing Goals and Priorities Table, Apple Valley (VI.1.)	3/8/2017 5:35:18 PM	MWG714
Fair Housing Goals and Priorities Table, Victor (/Afh/Document/View/495)	orville.pdf	Appendix A - Fair housing Goals and Priorities Table, Victorville (VI.1.)	3/8/2017 5:35:19 PM	MWG714
Amended CPP Apple \((/Afh/Document/View/496)	√alley.pdf	Appendix E - Amended Citizen Participation Plan, Apple Valley (III.)	3/8/2017 5:35:19 PM	MWG714
CDCAC approval of (/Afh/Document/View/497)	AFH.pdf	Appendix E - Community Development Citizens Advisory Committee, Approval of AFH (III.)	3/8/2017 5:35:19 PM	MWG714
Amended CPP Victor (/Afh/Document/View/498)	orville.pdf	Appendix E - Amended Citizen Participation Plan, Victorville (III.)	3/8/2017 5:35:19 PM	MWG714

File	Description	Uploaded	User
16 08 08 Daily Press Notice of PH for CPP.pdf (/Afh/Document/View/499)	Appendix E - Proof of publication, Public Notice Amended CPP Victorville (III.)	3/8/2017 5:35:20 PM	MWG714
16 07 30 Notice of PH for Citizen Part Plan Comments final.pdf (/Afh/Document/View/500)	Appendix E - Public Notice Amended CPP Victorville (III.)	3/8/2017 5:35:20 PM	MWG714
Cover Sheet with executive approval, TOAV and VV.pdf (/Afh/Document/View/501)	Appendix F - AFH Executive Approval (I .Coversheet Certification with Signatures)	3/8/2017 5:35:20 PM	MWG714
Lead Agency Certification of Council Approval.pdf (/Afh/Document/View/502)	Appendix F - AFH Lead Agency Council Approval	3/8/2017 5:35:20 PM	MWG714
Resolution No. 16-052, Victorville approval of AFH.pdf (/Afh/Document/View/503)	Appendix F - Victorville Council Approval of AFH	3/8/2017 5:35:20 PM	MWG714
AFFH chronology 2015-2016.pdf (/Afh/Document/View/504)	Appendix F - AFFH Chronology (III.)	3/8/2017 5:35:21 PM	MWG714
AFFH Survey and Community meeting flyer.pdf (/Afh/Document/View/505)	Appendix F - AFFH survey and community meeting flyer (III.)	3/8/2017 5:35:21 PM	MWG714
AFFH Survey and Community meeting flyer - Spanish.pdf (/Afh/Document/View/506)	Appendix F - AFFH survey and community meeting flyer, Spanish (III.)	3/8/2017 5:35:21 PM	MWG714
AFFH Survey 6-14-16.pdf (/Afh/Document/View/507)	Appendix F - AFFH Hard Copy Survey (III.)	3/8/2017 5:35:21 PM	MWG714
Affirmatively Furthering Fair Housing 2016 Online Survey.pdf (/Afh/Document/View/508)	Appendix F - AFFH Online Survey (III.)	3/8/2017 5:35:21 PM	MWG714
Survey Monkey Results Excel updated 8-2-16.xls.pdf (/Afh/Document/View/509)	Appendix F - AFFH Online Survey Results (III.)	3/8/2017 5:35:21 PM	MWG714
AFFH Community Workshop 7-12-16.pdf (/Afh/Document/View/510)	Appendix F - AFFH Community Workshop powerpoint (III.)	3/8/2017 5:35:21 PM	MWG714
Stakeholder Focus Group contacts.pdf (/Afh/Document/View/511)	Appendix F - Stakeholder Focus Group Meeting Contacts (III.)	3/8/2017 5:35:22 PM	MWG714
Stakeholder Meeting Sign-In Sheets.pdf (/Afh/Document/View/512)	Appendix F - Stakeholder Focus Group Meeting Sign-In Sheets (III.)	3/8/2017 5:35:22 PM	MWG714
AFHQuestionnaire 1.pdf (/Afh/Document/View/513)	Appendix F - AFH Focus Group Questionnaire 1 (III.)	3/8/2017 5:35:22 PM	MWG714

File	Description	Uploaded	User
AFHQuestionnaire 2.pdf (/Afh/Document/View/514)	Appendix F - AFH Focus Group Questionnaire 2 (III.)	3/8/2017 5:35:22 PM	MWG714
AFHQuestionnaire 3.pdf (/Afh/Document/View/515)	Appendix F - AFH Focus Group Questionnaire 3 (III.)	3/8/2017 5:35:22 PM	MWG714
affh assessment tool questionnaire stakeholders 6-22-16.pdf (/Afh/Document/View/516)	Appendix F - AFFH Stakeholder Questionnaire (III.)	3/8/2017 5:35:23 PM	MWG714
CDCAC Agenda.pdf (/Afh/Document/View/517)	Appendix E - CDCAC Meeting Agenda (III.)	3/8/2017 5:35:23 PM	MWG714
Inland Fair Housing Mediation Board data.pdf (/Afh/Document/View/518)	Appendix F - IFHMB data (V.1.a., V.B.i.2.a., V.B.ii.1.b.)	3/8/2017 5:35:23 PM	MWG714
Disability Workshop Flyer-Apple Valley Victorville.pdf (/Afh/Document/View/519)	Appendix F - Disability Workshop flyer (III.)	3/8/2017 5:35:24 PM	MWG714
Disability Workshop Flyer Spanish.pdf (/Afh/Document/View/520)	Appendix F - Disability Workshop flyer, Spanish (III.)	3/8/2017 5:35:24 PM	MWG714
Rental Housing Program, TOAV Code Enforcement.pdf (/Afh/Document/View/521)	Appendix F - Apple Valley Rental Housing Program List (V.A.2., V.B.iv.1.d.)	3/8/2017 5:35:24 PM	MWG714
Location of Rental Housing Program Properties.pdf (/Afh/Document/View/522)	Appendix F - Location of Rental Housing in Apple Valley (VI.A.2., VI.iv.1.d.)	3/8/2017 5:35:25 PM	MWG714
TOAV Reasonable Accomodation Application.pdf (/Afh/Document/View/523)	Appendix F - Apple Valley Reasonable Accommodation Application (II.1., IV.1.a., V.D.4.a., V.D.4.b.)	3/8/2017 5:35:25 PM	MWG714
Notice of Public Hearing.pdf (/Afh/Document/View/524)	Appendix G - Apple Valley Notice of Public Hearing AFH	3/8/2017 5:35:25 PM	MWG714
proof of publication, AFFH 8-26-16.pdf (/Afh/Document/View/525)	Appendix G - Apple Valley Proof of Publication, Notice of Public Hearing AFH	3/8/2017 5:35:26 PM	MWG714
16 07 28 Notice of PH for AFFH Related Data.pdf (/Afh/Document/View/526)	Appendix G - Victorville Notice of AFH Related Data	3/8/2017 5:35:26 PM	MWG714
16 07 27 Public Notice AFH 30-day commenting Final.pdf (/Afh/Document/View/527)	Appendix G - Apple Valley/Victorville 30-day public comment and hearing AFH	3/8/2017 5:35:26 PM	MWG714
16 08 23Notice of 30-Day Comm for AFH - English.pdf (/Afh/Document/View/528)	Appendix G - Apple Valley/Victorville Proof of publication of 30-day notice for public comment	3/8/2017 5:35:26 PM	MWG714

File	Description	Uploaded	User
16 08 10 Notice of Public Hearing for AFH Plan Spanish.pdf (/Afh/Document/View/529)	Appendix G - Apple Valley/Victorville 30-day public comment and hearing AFH, Spanish	3/8/2017 5:35:26 PM	MWG714
16 08 23 Notice of 30 Day Comm for AFH - Spanish.pdf (/Afh/Document/View/530)	Appendix G - Apple Valley/Victorville Proof of publication of 30-day notice for public comment, Spanish	3/8/2017 5:35:26 PM	MWG714
16 08 10 Notice of Public Hearing for AFH Plan.pdf (/Afh/Document/View/531)	Appendix G - Apple Valley/Victorville Notice of Public Hearing AFH	3/8/2017 5:35:26 PM	MWG714
16 08 10 Notice of Public Hearing for AFH Plan Spanish.pdf (/Afh/Document/View/532)	Appendix G - Apple Valley/Victorville Notice of Public Hearing AFH, Spansih	3/8/2017 5:35:27 PM	MWG714
16 09 09 Notice of PH Proof of Publication for AFH.pdf (/Afh/Document/View/533)	Appendix G - Apple Valley/Victorville Proof of publication Notice of PH for AFH, English and Spanish	3/8/2017 5:35:27 PM	MWG714
Map 5 Consortium.pdf (/Afh/Document/View/534)	Map 5, Consortium	3/8/2017 5:35:27 PM	MXG402
Map 6 Consortium.pdf (/Afh/Document/View/535)	Map 6, Consortium	3/8/2017 5:35:27 PM	MXG402
Map 4 Consortium.pdf (/Afh/Document/View/536)	Map 4 Consortium	3/8/2017 5:35:27 PM	MXG402
Map 3 Consortium.pdf (/Afh/Document/View/537)	Map 3 Consortium	3/8/2017 5:35:28 PM	MXG402
Map 2 Consortium.pdf (/Afh/Document/View/538)	Map 2 Consortium	3/8/2017 5:35:28 PM	MXG402
Map 1 Consortium.pdf (/Afh/Document/View/539)	Map 1 Consortium	3/8/2017 5:35:28 PM	MXG402
AFH Revisions Cover Letter.pdf (/Afh/Document/View/540)	Signature Sheet	3/8/2017 5:35:29 PM	MXG402

Maps

Map 1 - Race/Ethnicity (Race/Ethnicity)

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/100/060108/J)
Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/100/060108/R)
Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/100/063900/J)

Riverside-San Bernardino-Ontario, CA Region (../../../ArcGisV03/Map/V03/100/063900/R)

Map 2 - Race/Ethnicity Trends (Race/Ethnicity Trends, 1990 and Race/Ethnicity Trends, 2000) Race/Ethnicity Trends, 1990

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/200/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../.././ArcGisV03/Map/V03/200/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/200/063900/J)

Riverside-San Bernardino-Ontario, CA Region (.../../ArcGisV03/Map/V03/200/063900/R)

Race/Ethnicity Trends, 2000

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/201/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../../.ArcGisV03/Map/V03/201/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/201/063900/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/201/063900/R)

Map 3 - National Origin (National Origin)

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/300/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/300/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/300/063900/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/300/063900/R)

Map 4 - LEP (Limited English Proficiency)

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/400/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../.././ArcGisV03/Map/V03/400/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/400/063900/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/400/063900/R)

Map 5 - Publicly Supported Housing and Race/Ethnicity (Publicly Supported Housing and Race/Ethnicity)

Apple Valley, California Jurisdiction (../../../ArcGisV03/Map/V03/500/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/500/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/500/063900/J)

Riverside-San Bernardino-Ontario, CA Region (../.././ArcGisV03/Map/V03/500/063900/R)

Map 6 - Housing Choice Vouchers and Race/Ethnicity (Housing Choice Vouchers and Race/Ethnicity)

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/600/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/600/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/600/063900/J)

Riverside-San Bernardino-Ontario, CA Region (../../../ArcGisV03/Map/V03/600/063900/R)

Map 7 - Housing Burden and Race/Ethnicity (Housing Burden and Race/Ethnicity)

Apple Valley, California Jurisdiction (../../ArcGisV03/Map/V03/700/060108/J)

Riverside-San Bernardino-Ontario, CA Region (../../ArcGisV03/Map/V03/700/060108/R)

Victorville, California Jurisdiction (../../ArcGisV03/Map/V03/700/063900/J)

Riverside-San Bernardino-Ontario, CA Region (.../../ArcGisV03/Map/V03/700/063900/R)