

CITY OF ONTARIO
ASSESSMENT OF FAIR HOUSING



**Prepared by the
City of Ontario Housing and Neighborhood Preservation Agency
and the Lawyers' Committee for Civil Rights Under Law**

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Ontario Assessment of Fair Housing

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I. EXECUTIVE SUMMARY

The City of Ontario's 2020 Assessment of Fair Housing (AFH) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AFH also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AFH lays out meaningful strategies that can be implemented to achieve progress towards Ontario's obligation to affirmatively furthering fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with the City of Ontario's Housing and Municipal Services Agency and with input from a wide range of stakeholders, prepared this AFH. To provide a foundation for the conclusions and recommendations presented in this AFH, the following information was reviewed and analyzed:

- Data from the U.S. Census Bureau and other sources about the demographic, housing, economic, and educational landscape of Ontario and the broader region;
- Various city planning documents and ordinances;
- Data reflecting housing discrimination complaints; and
- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes in Ontario.

As required by federal regulations, the AFH draws from the sources listed above to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AFH identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

Data sources are largely based on information from the HUD AFFH-T Data Documentation. Values have been updated where possible and years are noted¹.

Overview of Ontario

The City of Ontario is located in the southwestern corner of San Bernardino County, California. The City is approximately 35 miles east of downtown Los Angeles and about 20 miles west-northwest of downtown Riverside. San Bernardino and Riverside Counties together comprise the Inland Empire region, which is the Riverside-San Bernardino-Ontario, CA MSA. Its current population is 181,107, and increase of approximately 20,000 over the last five years.

The City's population is 70.8% Hispanic, 15.6% white, 5.6% African American, and 6.3% Asian or Pacific Islander. In comparison to the region as a whole, Ontario has a higher number of Hispanic residents and a lower number of white residents.

¹ [https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-\(AFFHT0004a\)-March-2018.pdf](https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-(AFFHT0004a)-March-2018.pdf)

Within both Ontario and the broader region, Hispanic and Black households experience higher rates of housing problems, including but not limited to severe housing cost burden and severe housing problems; Hispanic households also have the highest rate of overcrowding. Non-family households are most likely to experience severe cost burdens.

The City of Ontario and the region do not have significant disparities in opportunity as access to opportunity measurements are similar across all racial and ethnic categories. Generally, Ontario's access to high performing schools, employment opportunity, and public transportation is higher than those of the region, but its environmental health index is significantly lower than the region as whole.

In Ontario, residents of publicly supported housing developments are not subject to significant disparities in access to opportunity as access to opportunity measurements are similar across all racial and ethnic categories. Ontario's access to high performing schools, employment opportunity, and public transportation is higher than the those of the region. However, Ontario's environmental health index is significantly lower than the region as a whole.

The federal Fair Housing Act, the California Fair Employment and Housing Act, and the Inland Fair Housing and Mediation provide Ontario residents with some fair housing protections. In addition, the City of Ontario has worked diligently to increase affordable housing opportunities. Even so, these protections and new housing opportunities are not enough to fully stem the loss of affordable housing and meet the housing needs of low- and moderate-income residents.

Contributing Factors to Fair Housing Issues

The AFH includes a discussion and analysis of the following contributing factors to fair housing issues:

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes
7. Availability, type, frequency, and reliability of public transportation
8. Community opposition
9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs

16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law

Fair Housing Goals and Priorities

To address the contributing factors described above, the AFH plan proposes the following goals and priorities.

1. *Goal #1: Increase the supply of affordable housing in high opportunity areas.*
 - a. Explore the creation of new funding sources of affordable housing.

- b. Using best practices from other jurisdictions, explore policies and programs that increase the supply affordable housing, such as linkage fees, inclusionary housing, public land set-aside, community land trusts, transit-oriented development, expedited permitting and review, and reduced building permit fees for nonprofit developers.
 - c. Explore opportunities to provide low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 120% of the Area Median Income to develop accessory dwelling units with affordability restriction on their property.
 - d. Align zoning codes to conform to recent California affordable housing legislation.
2. *Goal #2: Increase community integration for persons with disabilities.*
- a. Prioritize HOME funding for developments that include permanent supportive housing for non-elderly persons with disabilities.
3. *Goal #3: Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.*
- a. Conduct fair housing training for landlords and tenants on California's Source of Income Discrimination protections to reduce the number of voucher holders turned away.

The AFH lays out a series of achievable action steps that will help Ontario to not only meet its obligation to affirmatively fair housing but to continue to be a model for equity and inclusion in the region.

II. COMMUNITY PARTICIPATION PROCESS

- 1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AI 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.*

In order to ensure that the analysis contained in an AFH truly reflects conditions in a community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. A broad array of outreach was conducted through community meetings, focus groups, and public hearings.

In preparing this AFH, the City of Ontario and the Lawyers' Committee reached out to a wide array of stakeholders, including Hispanic groups, tenants, homeowners, fair housing organizations, civil rights and advocacy groups, organizations serving people with disabilities, including physical disabilities and people with HIV/AIDs, organizations serving domestic violence survivors, social services providers, and homeless providers to hear directly about fair housing issues affecting residents of Ontario.

Beginning in February 2020, the Lawyers' Committee held meetings with individual stakeholders throughout the region. In addition, the City of Ontario organized a series of meetings in predominantly Hispanic communities. On Saturday, February 29, 2020, an all-day community fair was held that attracted hundreds of residents. The City also held an evening meeting with a wide array of organizations to discuss the Assessment of Fair Housing. All community meetings had translation services available in Spanish. In addition, all meetings were held in locations accessible to people with mobility issues.

Fair housing surveys were conducted in-person both in English and Spanish at the community meetings and community fair. The majority of respondents were members of protected classes. Of the 73 respondents, 21 found housing discrimination to be an issue in Ontario, and 14 directly experienced discrimination. Survey respondents cited race as the reason for discrimination, followed by color, familial status, national origin, and disability.

All written comments received during the 30-day public comment period will be reviewed and either incorporated into the final AI or addressed as to why they were not incorporated in the Community Participation section.

III.ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES

- A. 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.*

The 2015 Ontario AI identified the following impediments to fair housing:

- 1. Lack of affordable housing in south Ontario, in general, and Ontario Ranch (f/k/New Model Colony), in particular;*
- 2. Lack of diversity and inclusion within Southern California;*
- 3. Disability discrimination, particularly denials of reasonable accommodation requests, is common;*
- 4. Possible covert discrimination against Latino residents;*
- 5. Access to public transportation is limited in higher income areas;*
- 6. Lack of supply of integrated, permanent supportive housing for persons with disabilities; and*
- 7. Lack of affordable housing.*

The AI cites the lack of adequate affordable housing as another impediment to fair housing opportunities. Many factors inhibit the ability to provide affordable housing in Ontario including market and governmental constraints. These constraints may result in housing that is not affordable to low- and moderate-income households, or may render residential construction of affordable housing economically infeasible for developers. Constraints to housing production significantly impact households with low- and moderate-incomes and special needs. Actions by local government may also impact the price and availability of housing in the city. Land use controls, site improvement requirements, building codes, development processing procedures, fees, and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development.

In addition to conducting the Analysis of Impediments to Fair Housing Choice and developing recommendations to address any identified impediments, HUD requires that each jurisdiction develop a plan to act on the recommendations, and maintain records reflecting the actions taken. The Fair Housing Guide published by HUD stipulates that, as part of the Fair Housing Action Plan, there should be a permanent structure established for fair housing oversight responsibilities. In the case of Ontario, the City's Housing and Municipal Services Agency is responsible for the oversight and record maintenance responsibilities for fair housing. The AI states that as part of the City's annual performance report for its Consolidated Plan, the City will report on its actions to affirmatively further fair housing. The City also provides a summary of its Analysis of Impediments to Fair Housing Choice and a description of the actions taken during the past program year, along with any analysis of the impact of the action.

The majority of the City's fair housing activity is conducted by Inland Fair Housing and Mediation Board, a non-profit organization, with expertise in fair housing issues. IFHMB conducts numerous workshops for property owners to provide education regarding requirements for reasonable accommodations and service/companion animals. The City will continue to work with IFHMB to

provide additional educational resources to further educate property owners of their rights and responsibilities.

The AI addresses six specific target groups, tenants, property purchasers, property owners, property managers, realtors, lenders, and local government. Recommendations, actions, and a time period for completion are presented for each target group.

FAIR HOUSING STRATEGY

Priority 1: Continue to implement the Fair Housing laws by providing funding to further fair housing.

Five-Year Objective: The City will continue to support Inland Fair Housing and Mediation Board to provide fair housing services within Ontario.

Accomplishments: The City worked cooperatively with Inland Fair Housing and Mediation Board to provide fair housing services and landlord/tenant mediation services.

Program/ Project	Type of Assistance	Expenses	Annual Goal	Annual Accomplishments
Fair Housing (AFFH) Program (IFHMB)	CDBG	\$22,000	100 persons	180 persons
Landlord/Tenant Mediation Services (IFHMB)	CDBG	\$10,200	1,400 persons	1,263 persons
TOTAL		\$32,200		

Fair Housing and Mediation Services Program

The City contracted with Inland Fair Housing and Mediation Board (IFHMB) to provide assistance to Ontario residents regarding fair housing and landlord/tenant mediation issues. IFHMB assisted and investigated (using HUD FHIP Guidelines) complaints from individuals with alleged discrimination actions. This program also educated the public on civil rights laws utilizing various mass media outlets.

During FY 2018-19, 180 persons were assisted through the fair housing component of this program. A total of 1,263 persons were assisted through the housing mediation component of this program. In addition, the following outreach efforts were completed: 6,056 brochures/flyers were disseminated to Ontario public agencies and community groups; 573 persons attended community education programs presented by Inland Fair Housing and Mediation Board, fair housing radio programs and public service announcements were aired on KCAL AM & FM, KDIF, KWRN, KXSB, KXRS, KWRM (English/Spanish), KSZL, KLFE, KOLA and KGGI; and celebrated National Fair Housing Month Conference in April 2019.

The AI addresses six specific target groups, tenants, property purchasers, property owners, property managers, realtors, lenders, and local government. Recommendations, actions, and a time period for completion are presented for each target group.

PROGRAM AREA	SPECIFIC ACTION TAKEN	ACCOMPLISHMENTS
ENFORCEMENT		
Counsel	1. Persons are counseled regarding their civil rights under both the Federal and State Fair Housing law.	180 clients served.
Investigate	1. Investigate discrimination. 2. Test for discrimination on bona fide complaint	180 clients served.
Mediation/ Conciliation	1. Mediate alleged cases of discrimination if appropriate.	1,263 clients served.
Referral	1. Refer cases to State Department of Fair Housing Employment & Housing, HUD Fair Housing, or appropriate attorney.	When appropriate.
EDUCATION		
Public	1. Free regional workshops 2. Course for high school seniors 3. Community events and presentations	Disseminated 6,056 brochures and flyers. 573 persons attended fair housing workshops throughout the region.
Property Owners	1. Courses on Fair Housing for owners, property management companies, and on-site managers. 2. Disseminate fair housing posters 3. Property management workshops	E-Mailed over 1,000 Fair Housing Quarterly Newsletters to Ontario rental owners and realtors in San Bernardino County.
Realtors	1. Provide workshops for the Association 2. Equal opportunity community technical advisor 3. Provide Fair Housing guest speakers for presentations	Offered homeownership classes twice a week.
Municipality	1. Provide fair housing seminars to appropriate staff 2. Provide technical assistance on housing issues 3. Prepare proclamation for April Fair Housing month.	Proclaimed April as Fair Housing Month.
Lenders	1. Fair lending technical advisor 2. CRA program development with lenders 3. HMDA analysis	Completed HMDA analysis. Developed and disseminated lender newsletter to discuss fair housing issues.
Newspapers	1. Review housing ads for discrimination 2. Provide workshops for classified department as requested.	Ongoing.
OUTREACH		
Radio	1. Regular live hour shows aired on KCAL, KWRN, KDIF, KXSB, KXRS, KBTW, KWRM (English/Spanish), and KWRP. 2. Public service announcements (PSAs) for Fair Housing Workshops in all countywide stations	Completed on quarterly basis.

PROGRAM AREA	SPECIFIC ACTION TAKEN	ACCOMPLISHMENTS
Television	<ol style="list-style-type: none"> 1. Guest spots on local cable interview shows (Channel 24) 2. Public announcements for Fair Housing workshops in city cable station 	Fair Housing cable releases throughout the region.
Public	<ol style="list-style-type: none"> 1. Provide presentations to any civic or private agencies 	Provided presentations to R.S.V.P Volunteers.
Brochure	<ol style="list-style-type: none"> 1. Sent to public and private agencies for client referral 2. Fair Housing Quarterly Newsletter to property owners/management 	E-mailed over 1,000 Fair Housing Quarterly Newsletters to owners throughout the region.
Newspaper	V. Advertising for fair housing workshops VI. Feature stories on fair housing month. VII. Community services feature articles.	Ongoing.

IV. Fair Housing Analysis

A. Demographic Summary

This Demographic Summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency, national origin, and age. The data included reflects the composition of the Riverside-San Bernardino-Ontario region.

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

Ontario is located in Southern California, east of Los Angeles. Ontario has a plurality Hispanic population and a smaller White population when compared to the region.

Table 1 Demographics, Ontario, California

	Jurisdiction			Region		
Race/Ethnicity	#		%	#		%
White, Non-Hispanic.	27,543		16.10%	1,493,828		33.37%
Black, Non-Hispanic	9,719		5.68%	309,795		6.92%
Hispanic	119,805		70.04%	2,239,029		50.02%
Asian/Pacific Island, Non-Hispanic	10,210		5.97%	298,740		6.67%
Native American, Non-Hispanic	307		0.18%	16,519		0.37%
National Origin						
#1 country of origin	Mexico	32,565	19.04%	Mexico	554,782	12.39%
#2 country of origin	Philippines	2,327	1.36%	Philippines	62,880	1.40%
#3 country of origin	El Salvador	1,885	1.10%	El Salvador	32,115	0.72%
#4 country of origin	Guatemala	1,228	0.72%	China	24,176	0.54%
#5 country of origin	Vietnam	1,040	0.61%	Guatemala	23,668	0.53%
#6 country of origin	China	678	0.40%	Vietnam	21,373	0.48%
#7 country of origin	Honduras	610	0.36%	Korea	17,364	0.39%
#8 country of origin	Thailand	413	0.24%	India	17,278	0.39%
#9 country of origin	Peru	399	0.23%	Canada	17,106	0.38%
#10 country of origin	Korea	376	0.22%	Taiwan	9,935	0.22%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	37,002	24.08%	Spanish	533,544	13.45%
#2 LEP Language	Vietnamese	742	0.48%	Chinese	20,495	0.52%
#3 LEP Language	Chinese	590	0.38%	Tagalog	16,986	0.43%
#4 LEP Language	Tagalog	514	0.33%	Vietnamese	12,570	0.32%
#5 LEP Language	Other Pacific Island Language	212	0.14%	Korean	11,883	0.30%
#6 LEP Language	Korean	190	0.12%	Arabic	6,835	0.17%
#7 LEP Language	Portuguese	167	0.11%	Other Pacific Island Language	5,360	0.14%
#8 LEP Language	Urdu	109	0.07%	Other Indic Language	3,125	0.08%

	Jurisdiction			Region		
#9 LEP Language	African	74	0.05%	Cambodian	3,117	0.08%
#10 LEP Language	Arabic	67	0.04%	Thai	2,576	0.06%
Disability Type						
Hearing difficulty		3,547	2.10%		134,692	3.10%
Vision difficulty		2,853	1.70%		98,573	2.20%
Cognitive difficulty		5,182	3.30%		185,324	4.50%
Ambulatory difficulty		8,104	5.10%		264,490	6.50%
Self-care difficulty		3,276	2.10%		110,137	2.70%
Independent living difficulty		5,245	4.20%		187,680	5.80%
Sex						
Male		84,148	49.20%		2,226,881	49.75%
Female		86,893	50.80%		2,249,341	50.25%
Age						
Under 18		46,549	27.22%		1,187,444	26.53%
18-64		109,766	64.18%		2,746,625	61.36%
65+		14,726	8.61%		542,153	12.11%
Family Type						
Families with children		17,417	34.44%		439,856	32.18%
<i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS, 2013-2017. Note 4: China does not include Hong Kong and Taiwan. Note 5: Refer to the Data Documentation for details www.hudexchange.info/resource/4848/affh-data-documentation.</i>						

Race and Ethnicity

Ontario has a plurality Hispanic population (70.04%), with significantly smaller populations of whites (16.10%), Asians (5.97%), and Black residents (5.68%). The Native American population is 0.18%. In comparison, the region is one-half Hispanic (50.02%) and one-third White (33.37%), with similar small numbers of Black, Asian/Pacific Islander, and Native American populations.

National Origin

The most common country of origin within Ontario is Mexico, with 19.04% of the city population comprised of residents from Mexico. The remaining most countries of origin are, in order, Philippines, El Salvador, Guatemala, Vietnam, Korea, Philippines, China excluding Hong Kong & Taiwan, Honduras, Thailand, Peru, and Korea.

Limited English Proficiency

The most commonly spoken language for those in the city with Limited English Proficiency (LEP) is Spanish. The remaining most common languages for those with LEP are, in order, Vietnamese, Chinese, Tagalog, other Pacific Island language, Korean, Portuguese, Urdu, African, and Arabic.

Disability

The most common type of disability experienced by Ontario residents is ambulatory difficulty. The remaining most common disabilities are, in order of prevalence, independent living difficulty, cognitive difficulty, hearing difficulty, self-care difficulty, and vision difficulty.

Sex

Ontario residents are 49.20% male and 50.80% female.

Age

The majority of Ontario residents are between 18-64, with 64,18% of residents falling in this group. 27.22% of city residents are under 18, and 8.61% are 65 or older.

Familial Status

Families with children constitute 34.44% of the total population.

Table 2: Demographic Trends

	(Ontario, CA CDBG, HOME, ESG) Jurisdiction					
	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	63,925	47.49%	42,281	26.95%	30,035	18.32%
Black, Non-Hispanic	9,232	6.86%	11,395	7.26%	10,521	6.42%
Hispanic	55,637	41.33%	94,248	60.07%	112,748	68.78%
Asian or Pacific Islander, Non-Hispanic	4,779	3.55%	6,992	4.46%	9,500	5.80%
Native American, Non-Hispanic	521	0.39%	961	0.61%	652	0.40%
National Origin						
Foreign-born	30,276	22.52%	48,327	30.80%	48,630	29.67%
LEP						
Limited English Proficiency	23,282	17.32%	40,071	25.53%	38,535	23.51%
Sex						
Male	67,281	50.04%	78,049	49.73%	81,478	49.70%
Female	67,162	49.96%	78,882	50.27%	82,446	50.30%
Age						
Under 18	43,955	32.69%	55,167	35.15%	49,365	30.11%
18-64	82,145	61.10%	92,657	59.04%	103,512	63.15%
65+	8,343	6.21%	9,106	5.80%	11,047	6.74%
Family Type						
Families with children	19,489	61.25%	9,056	61.23%	19,205	53.92%

	(Riverside-San Bernardino-Ontario, CA) Region					
	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	1,615,830	62.41%	1,540,776	47.33%	1,546,666	36.61%
Black, Non-Hispanic	168,731	6.52%	263,322	8.09%	336,944	7.98%
Hispanic	685,672	26.48%	1,228,683	37.75%	1,996,402	47.25%

(Riverside-San Bernardino-Ontario, CA) Region						
Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend	
	#	%	#	%	#	%
Asian or Pacific Islander, Non-Hispanic	93,331	3.60%	164,035	5.04%	298,585	7.07%
Native American, Non-Hispanic	18,007	0.70%	36,061	1.11%	36,077	0.85%
National Origin						
Foreign-born	360,666	13.93%	612,354	18.81%	904,558	21.41%
LEP						
Limited English Proficiency	252,012	9.73%	462,538	14.21%	660,791	15.64%
Sex						
Male	1,294,274	50.00%	1,618,466	49.73%	2,101,083	49.73%
Female	1,294,518	50.00%	1,636,316	50.27%	2,123,768	50.27%
Age						
Under 18	771,845	29.81%	1,044,686	32.10%	1,214,696	28.75%
18-64	1,539,215	59.46%	1,869,817	57.45%	2,570,221	60.84%
65+	277,732	10.73%	340,280	10.45%	439,934	10.41%
Family Type						
Families with children	350,701	53.60%	266,840	54.97%	500,062	50.99%
<i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS, updated to 2013-2017. Note 4: China does not include Hong Kong and Taiwan. Note 5: Refer to the Data Documentation for details</i> www.hudexchange.info/resource/4848/affh-data-documentation						

Religion

The most common religious group is Roman Catholic. Approximately 445,334 of San Bernardino County residents identify as Roman Catholic, which is 21.88% of the total population. The second most common is nondenominational, which accounts for 105,314 residents, or 5.17% of the total population. Mormon and Southern Baptist Convention, and Seventh Day Adventist account for 2.57%, 2.21%, and 1.61% of the population respectively. The remaining religions, which account for less than 1% of the total county population, are Assemblies of God, Muslim, Buddhism, National Baptist Convention, and Lutheran.

B. General Issues

i. Segregation/Integration

1. Analysis

- a. *Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

Dissimilarity Index

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-40	Low Segregation
	41-54	Moderate Segregation
	55-100	High Segregation

The tables below reflect the Dissimilarity Indices for Ontario and the region. The Dissimilarity Index measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the extent of the segregation.

Overall, Ontario experiences low levels of segregation, and the dissimilarity index values are lower than the region as a whole. The Non-White/White value is 24.54, Black/White 33.54, Hispanic/White 27.75, and Asian or Pacific Islander/White 27.28. The values for Non-White/White and Hispanic/White have fallen since 2010 while Black/White and Asian or Pacific Islander/White have increased, as they have over the last three decades.

The region has low to moderate levels of segregation. The lowest value is for Non-White White at 39.19 while the highest is Black/White at 46.35. Hispanic/White is 42.13, and Asian/White is 42.66. Black residents in both Ontario and the region face consistently higher Dissimilarity Index values, especially compared to Non-White/White or other populations' index values.

Table 1 Dissimilarity Index Values by Race and Ethnicity for Ontario

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	24.45	26.68	26.85	24.54
Black/White	16.14	16.54	24.19	33.54
Hispanic/White	27.93	30.40	30.56	27.75
Asian or Pacific Islander/White	19.62	19.60	23.97	27.28

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS, updated to 2013-2017. Note 4: China does not include Hong Kong and Taiwan. Note 5: Refer to the Data Documentation for details www.hudexchange.info/resource/4848/affh-data-documentation.

Table 2 Dissimilarity Index Values by Race and Ethnicity for region

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	32.92	38.90	38.95	39.19
Black/White	43.74	45.48	43.96	46.35
Hispanic/White	35.57	42.40	42.36	42.13
Asian or Pacific Islander/White	33.17	37.31	38.31	42.66

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS, updated to 2013-2017. Note 4: China does not include Hong Kong and Taiwan. Note 5: Refer to the Data Documentation for details www.hudexchange.info/resource/4848/affh-data-documentation.

b. Explain how these segregation levels have changed over time (since 1990).

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation. These indices, when taken together, capture the neighborhood demographics experienced, on average, by members of a particular racial or ethnic group within a city or metropolitan area. The Isolation Index measures what percentage of the census tract in which a person of a certain racial identity lives is comprised of other persons of that same racial/ethnic group. Values for the Isolation Index range from 0 to 100. The Exposure Index is a group's exposure to all racial groups. Values for the Exposure Index also range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from another group.

Table 3 Isolation Index Values by Race and Ethnicity in Ontario

Isolation Index	
White/White	21.28
Black/Black	8.15
Hispanic/Hispanic	70.19
Asian/Asian	12.91

Source: Based on 2013-2017 American Community Survey Estimates

Table 4 Isolation Index Values by Race and Ethnicity in region

Isolation Index	
White/White	45.72
Black/Black	11.74
Hispanic/Hispanic	59.29
Asian/Asian	14.32

Source: Based on 2013-2017 American Community Survey Estimates

Isolation values for different populations vary widely across Ontario and the region. Values in Ontario for Hispanic residents are almost identical to the share of the overall population that is Hispanic, reflecting a low level of segregation within Ontario. In Ontario, Hispanic residents have an Isolation Index value of 70.19, white residents 21.28, Asian residents 12.91, and Black residents 8.15.

In the region, Hispanic residents have an Isolation Index value of 59.29, white residents 45.72, Asian residents 14.32, and Black residents 11.74, Hispanic residents 52.81, and Asian residents 31.84.

Isolation Index values for Hispanics are uniformly high both in the city and region, due to the large number of Hispanic residents. Conversely, Isolation Index values for Black residents are uniformly low both in Ontario and region but are consistent with higher levels of segregation of Black residents in light of the greater difference between the percentage of the populations of both Ontario and the region that are Black and neighborhood conditions faced by Black residents.

Table 5 Exposure Index Values for Ontario

Exposure Index	
Black/White	17.81
Hispanic/White	16.01
Asian/White	20.29
White/Black	5.39
Hispanic/Black	4.90
Asian/Black	5.92
White/Hispanic	61.51
Black/Hispanic	62.25
Asian/Hispanic	57.83
White/Asian	9.12
Black/Asian	8.80
Hispanic/Asian	6.76

Source: Based on 2013-2017 American Community Survey Estimates

Table 6 Exposure Index Values for region

Exposure Index	
Black/White	27.70
Hispanic/White	25.69
Asian/White	33.22
White/Black	5.74
Hispanic/Black	6.94
Asian/Black	7.39
White/Hispanic	38.51
Black/Hispanic	50.16
Asian/Hispanic	41.48
White/Asian	6.64
Black/Asian	7.12
Hispanic/Asian	5.53

Source: Based on 2013-2017 American Community Survey Estimates

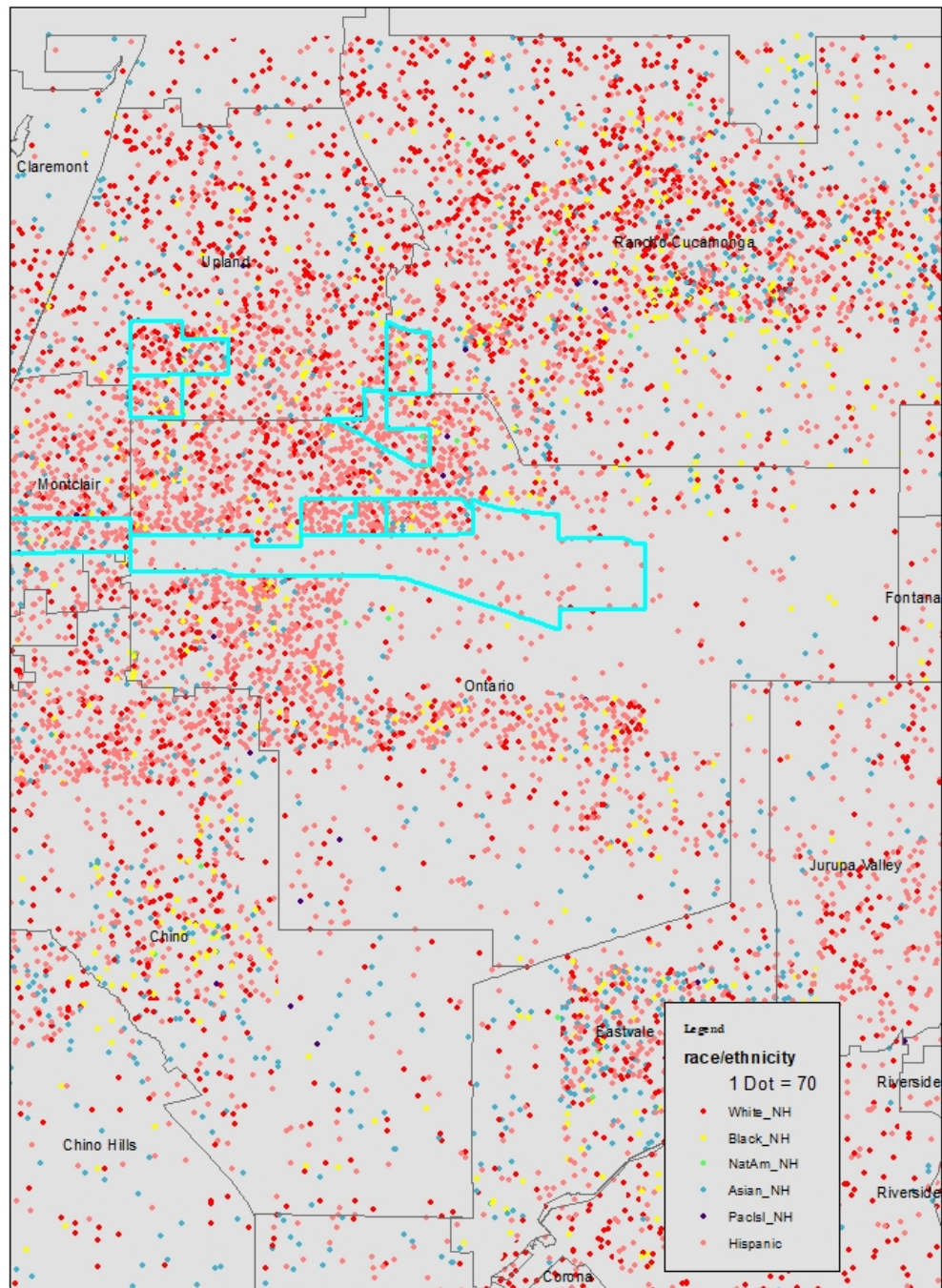
Exposure Index values are for the most part consistent with proportions of populations in Ontario and region. In Ontario, the highest exposure index values are Black/Hispanic at 62.25 and White/Hispanic at 61.51. The lowest values are for Hispanic/Black at 4.90 and White/Black at 5.39.

In the region, Exposure Index values reflect the lower proportion of the population that is Hispanic and the higher proportion that is White, with Black/Hispanic at 50.16 and White/Hispanic at 38.56. The lowest values are Hispanic/Asian at 5.53 and White/Black at 5.74.

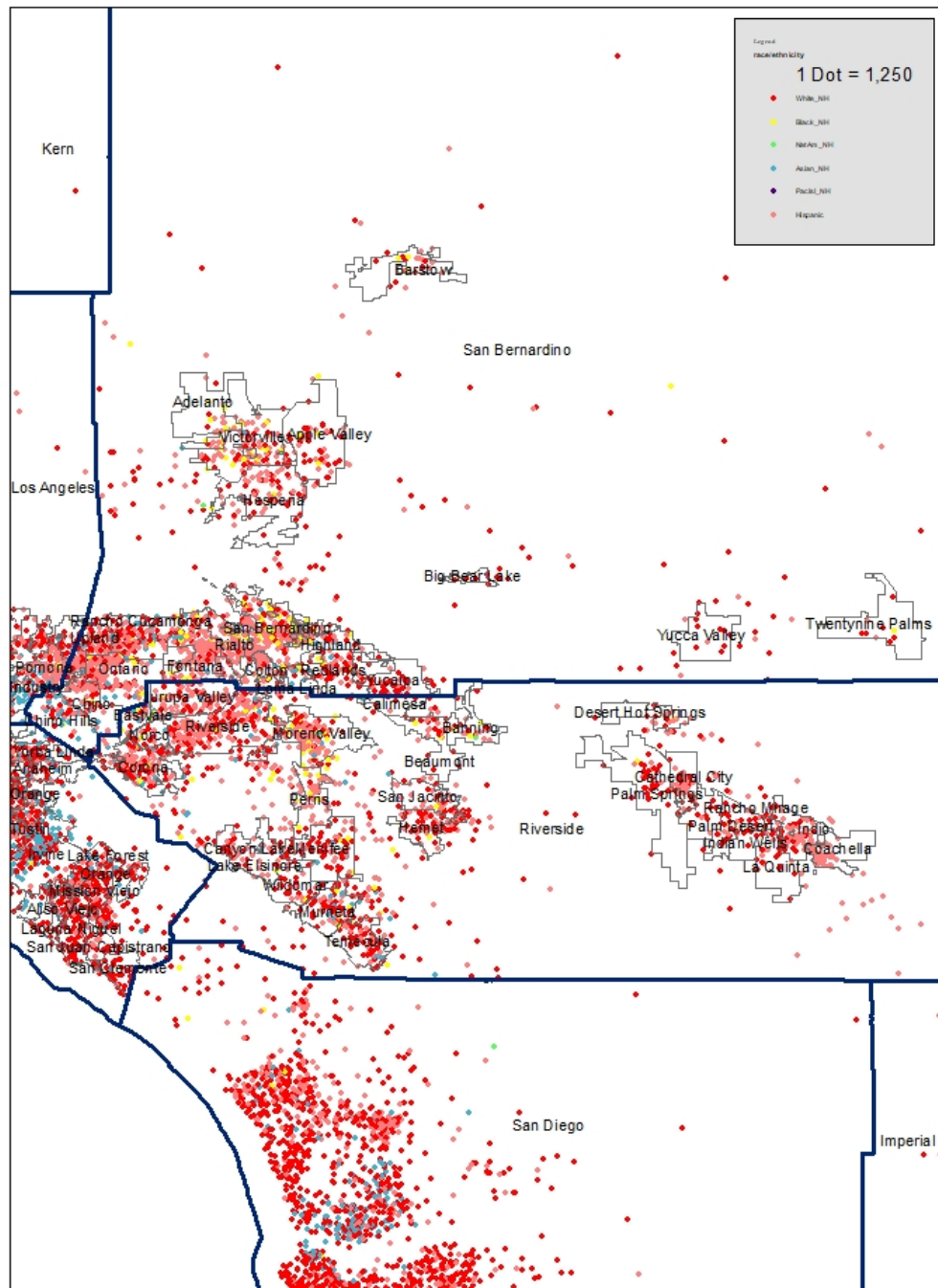
- c. *Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*

Race/Ethnicity

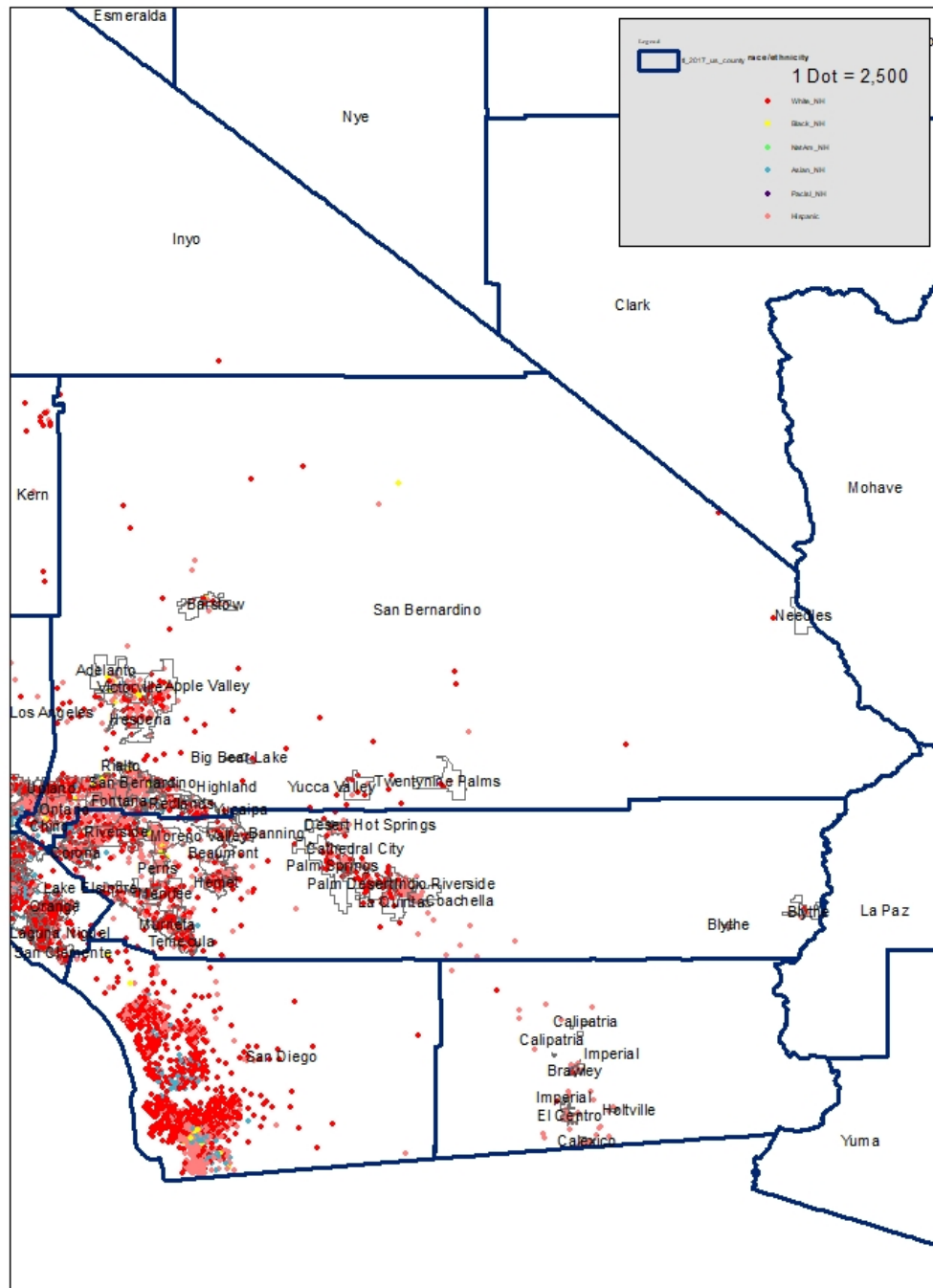
Map 1: Race/Ethnicity, Ontario, CA



Map 2: Race/Ethnicity, Southern region



Map 3: Race/Ethnicity, region



The patterns of segregation both in the city and region are visible in the above maps. In general, White residents tend to reside towards the northern part of the region towards Rancho Cucamonga and Upland. There is a higher concentration of Hispanics in Ontario's west side, while Asian residents are more concentrated in Rancho Cucamonga. Black residents are also clustered in Rancho Cucamonga as well as Chino. The R/ECAP areas have higher concentrations of Hispanic residents than they do of other racial or ethnic groups. The population in the eastern part of Ontario is more sparsely populated because of the presence of the Ontario International Airport.

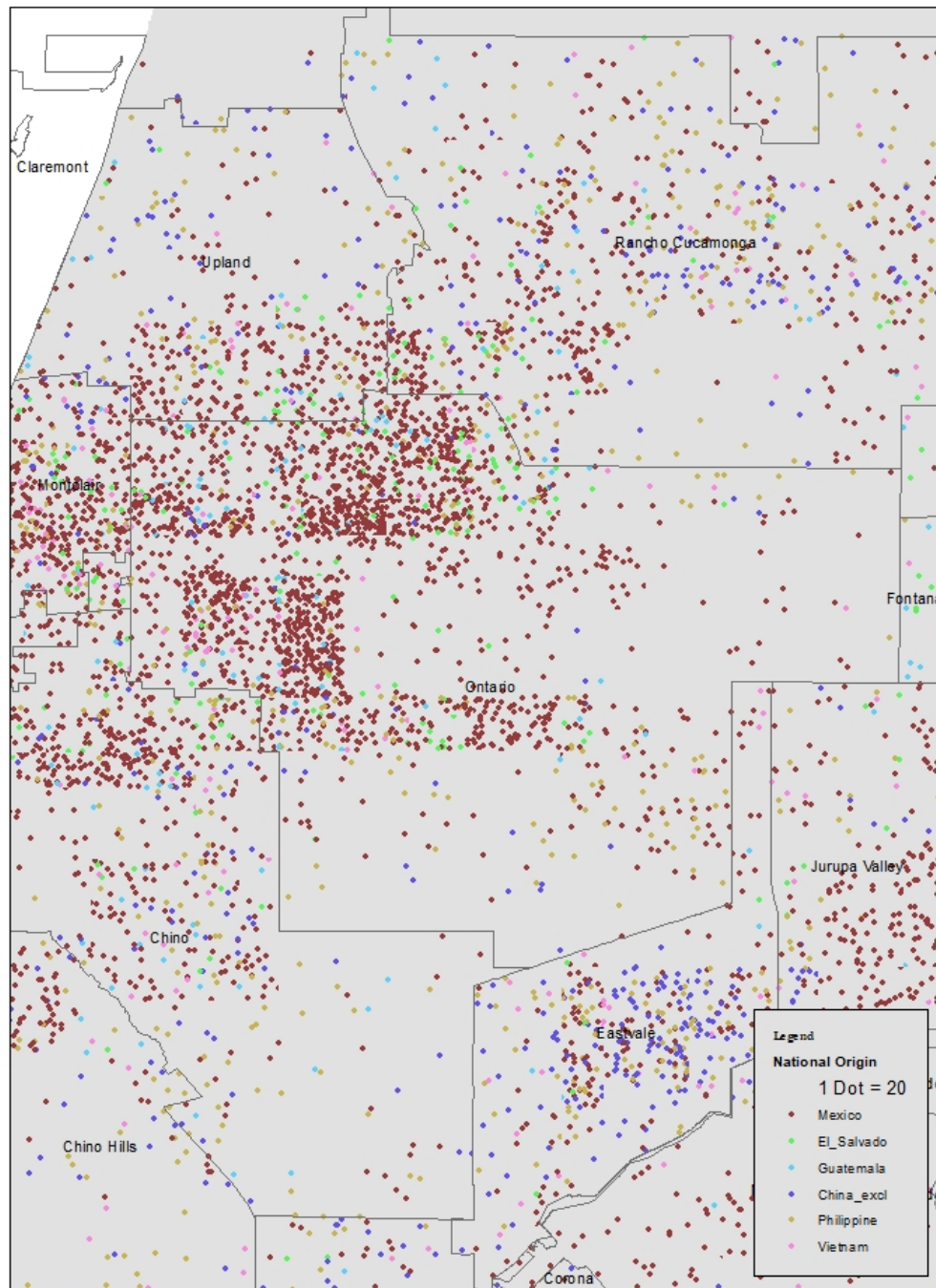
Regionally, rural areas are more populated by White residents. San Bernardino, Riverside, and Ontario all have higher populations of Hispanic residents, while Temecula, Palm Desert, and San Antonio Heights have higher populations of White residents. Black residents are more present in Victorville, San Bernardino, and Moreno Valley.

Integration

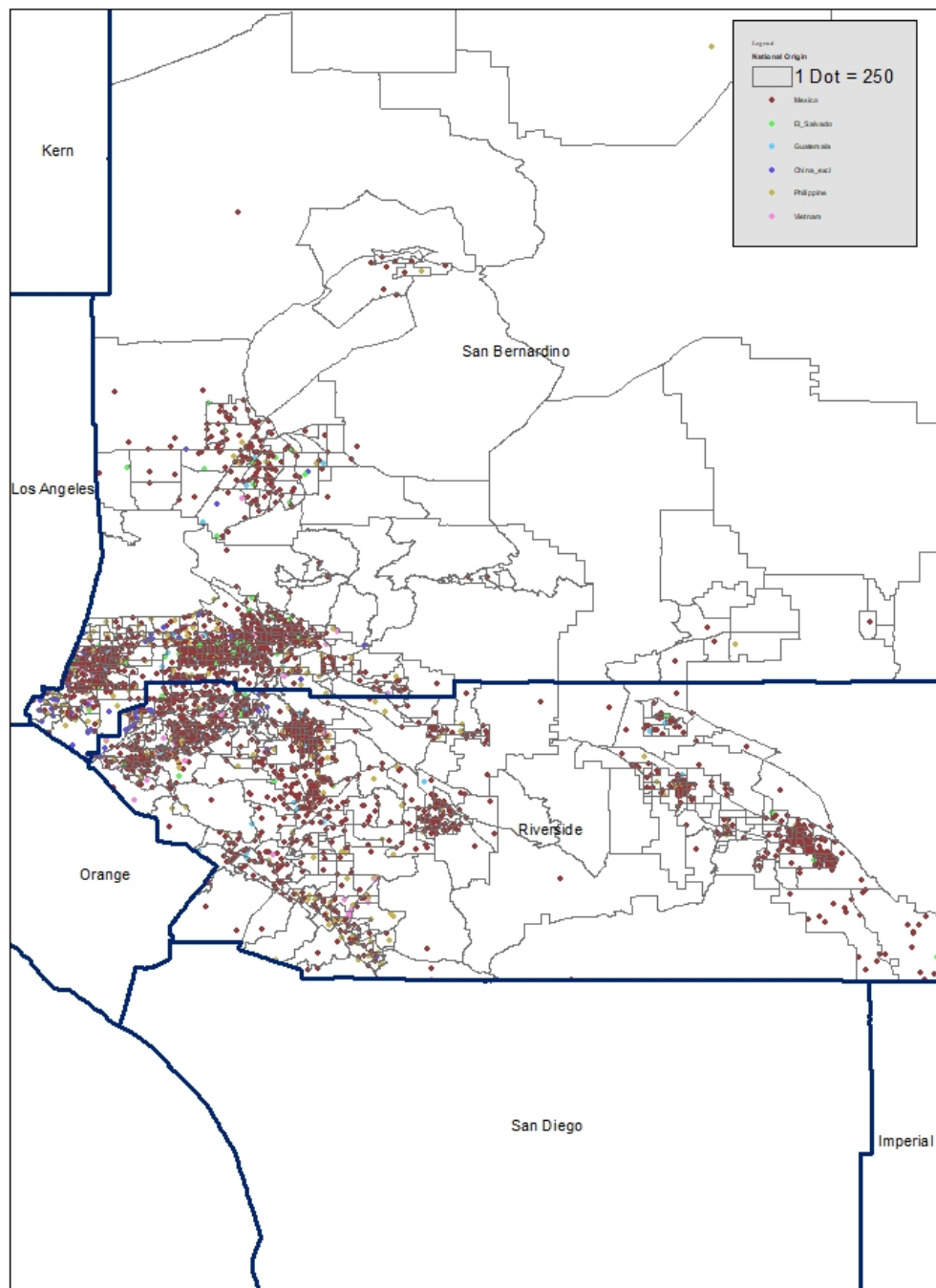
Compared to the surrounding counties of Los Angeles and Orange, there appears to be a higher level of integration in Ontario and the region.

National Origin

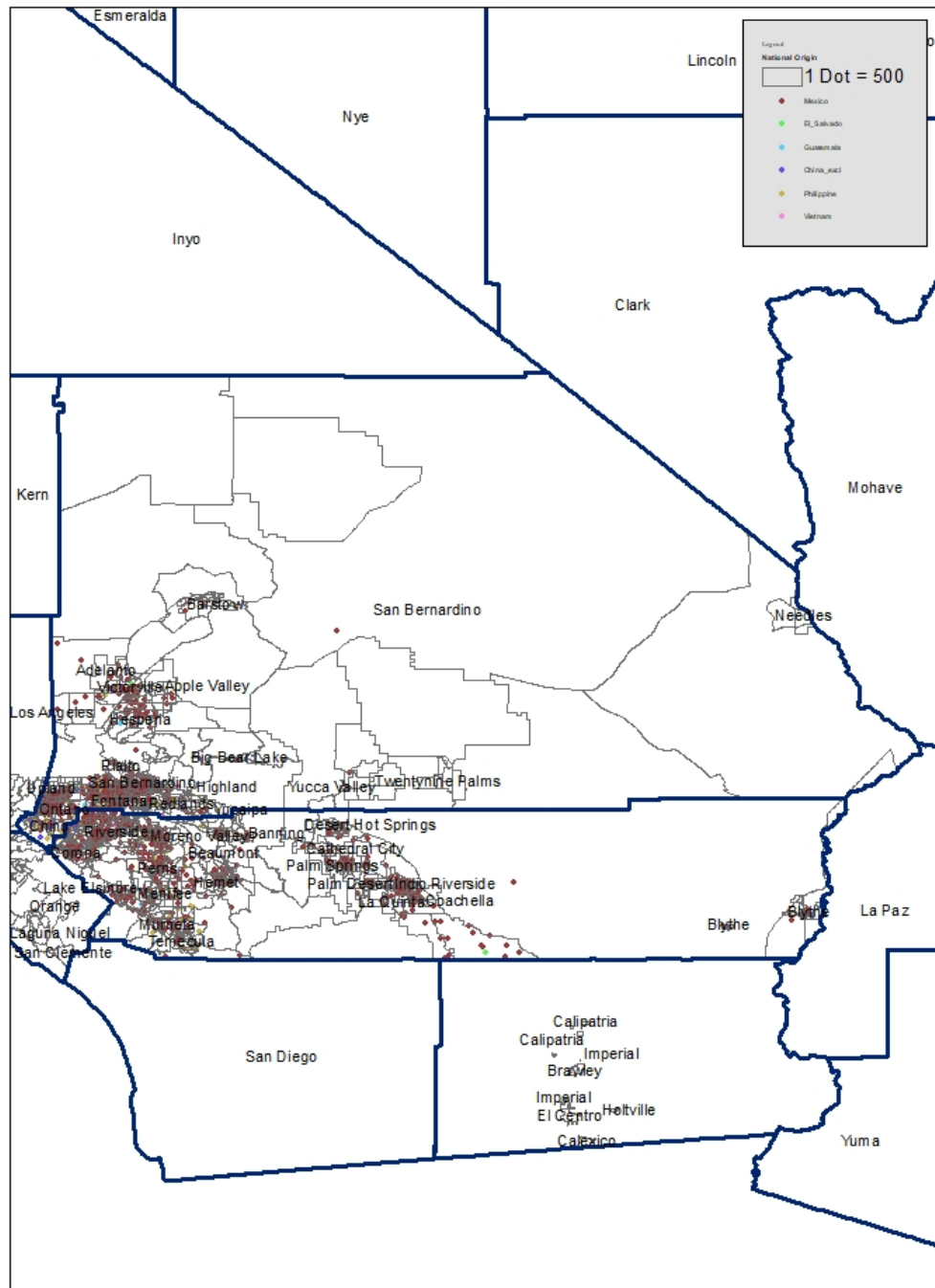
Map 4: National Origin, Ontario CA



Map 5: National Origin, Southern region



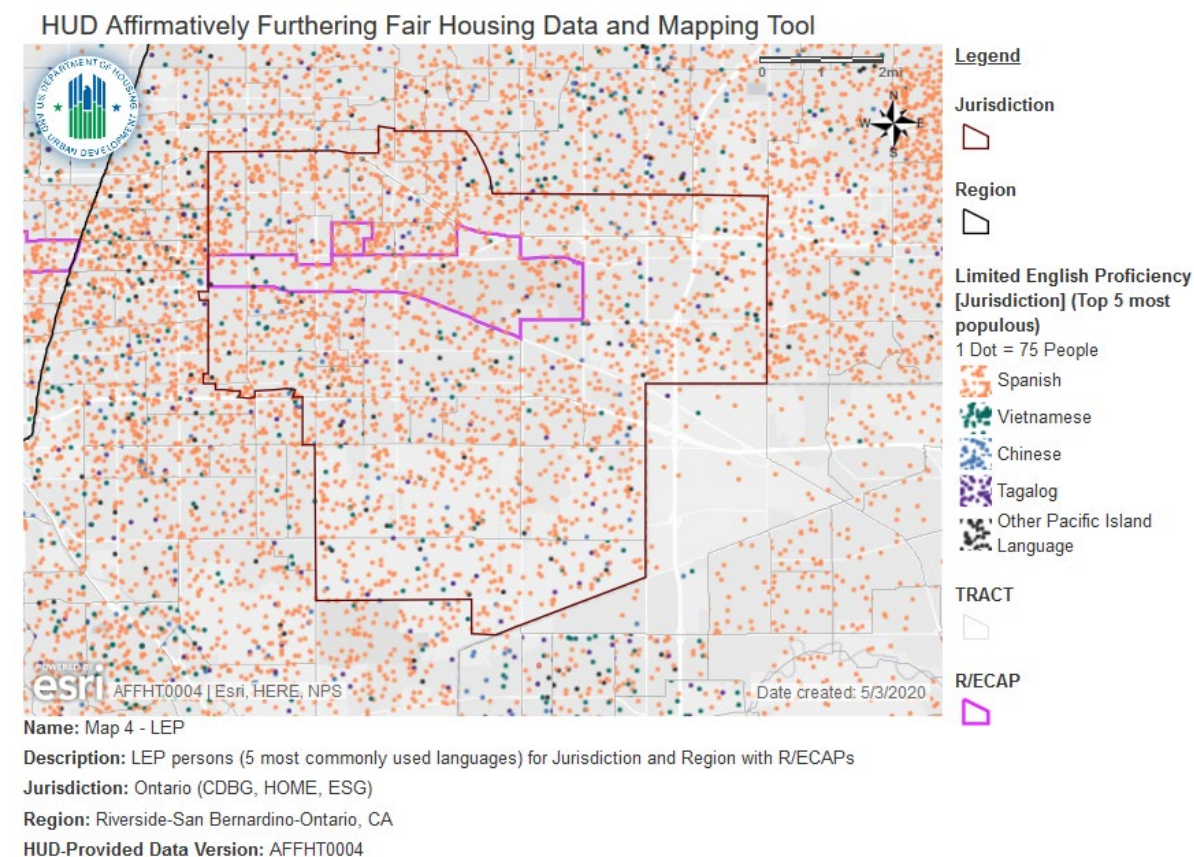
Map 6: National Origin, region



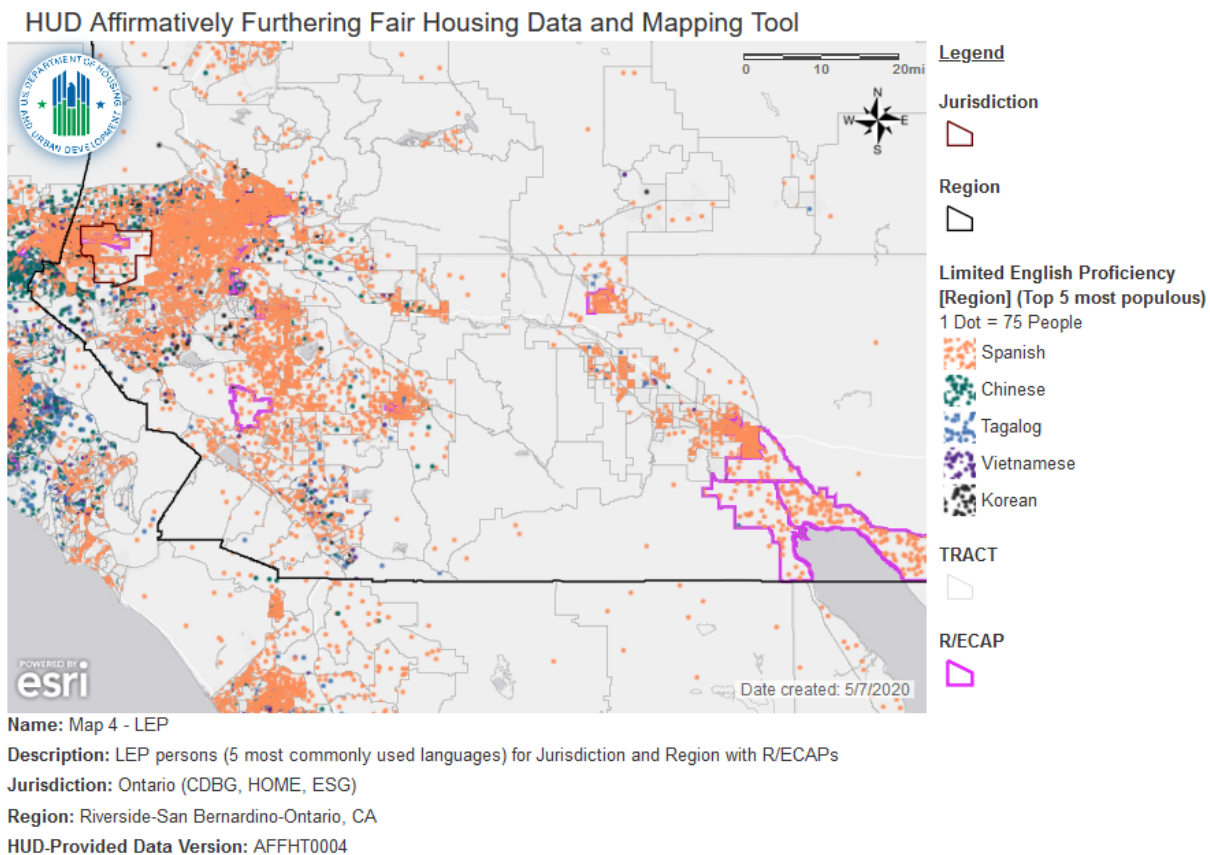
There are some patterns of settlement based on national origin in Ontario and the region. The map above shows the largest populations of foreign national origins in the region using the top six largest foreign-born populations. These residents are primarily concentrated in the more urban areas of the region.

In the western part of Ontario and in Jurupa Valley, there is a high Mexican population. Central Ontario and Montclair are home to an El Salvadorian population. There is a significant presence of a Chinese population found in Eastvale and Highgrove. Filipino and Vietnamese populations can be found in in Eastvale, Rancho Cucamonga, Temecula, and northern Palm Springs. The Mexican population is more concentrated than the other five national origin groups, which tend to be more scattered throughout the region.

Map 7: Limited English Proficiency, Ontario CA



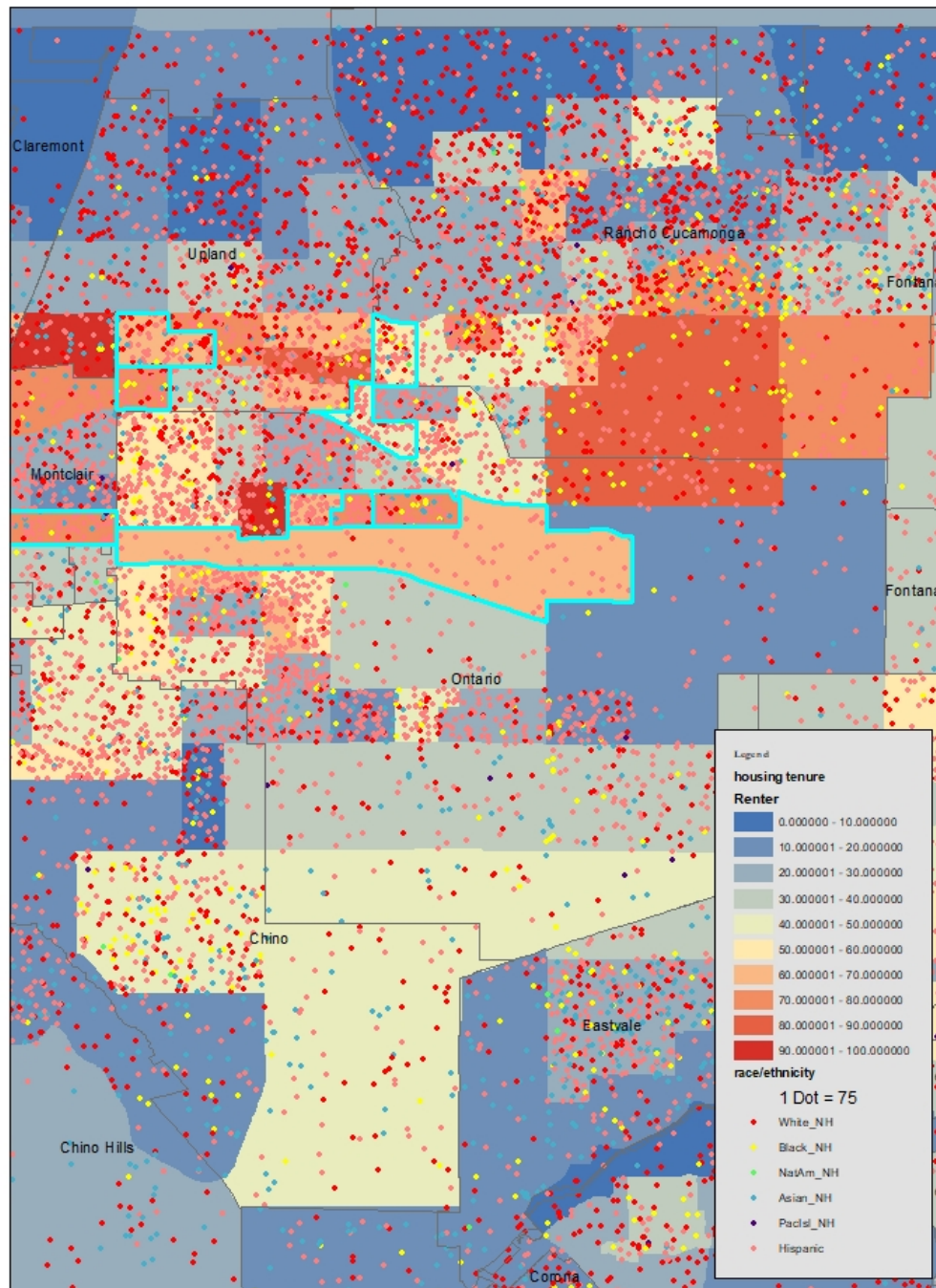
Map 8: Limited English Proficiency, Southern region



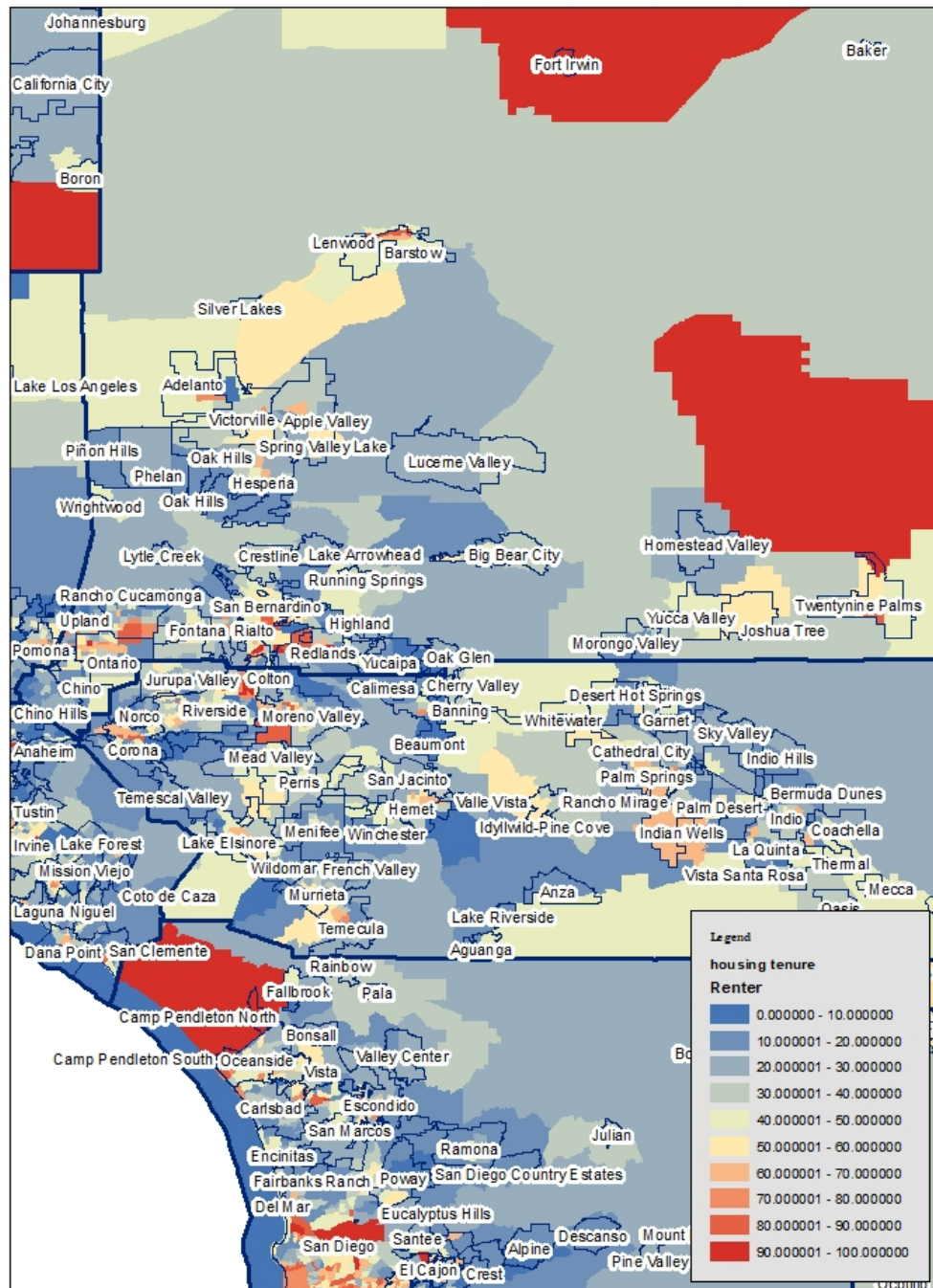
Spanish speakers are the largest group of LEP speakers in Ontario and the region by far, followed by speakers of Vietnamese, Chinese, Tagalog, and other Pacific Island languages. While Spanish speakers are more concentrated on the west side and the northeast corner of Ontario, the other LEP speakers are more evenly dispersed. Regionally, Spanish speakers are found overwhelmingly in the area stretching from Ontario's eastern border to San Bernardino.

- d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

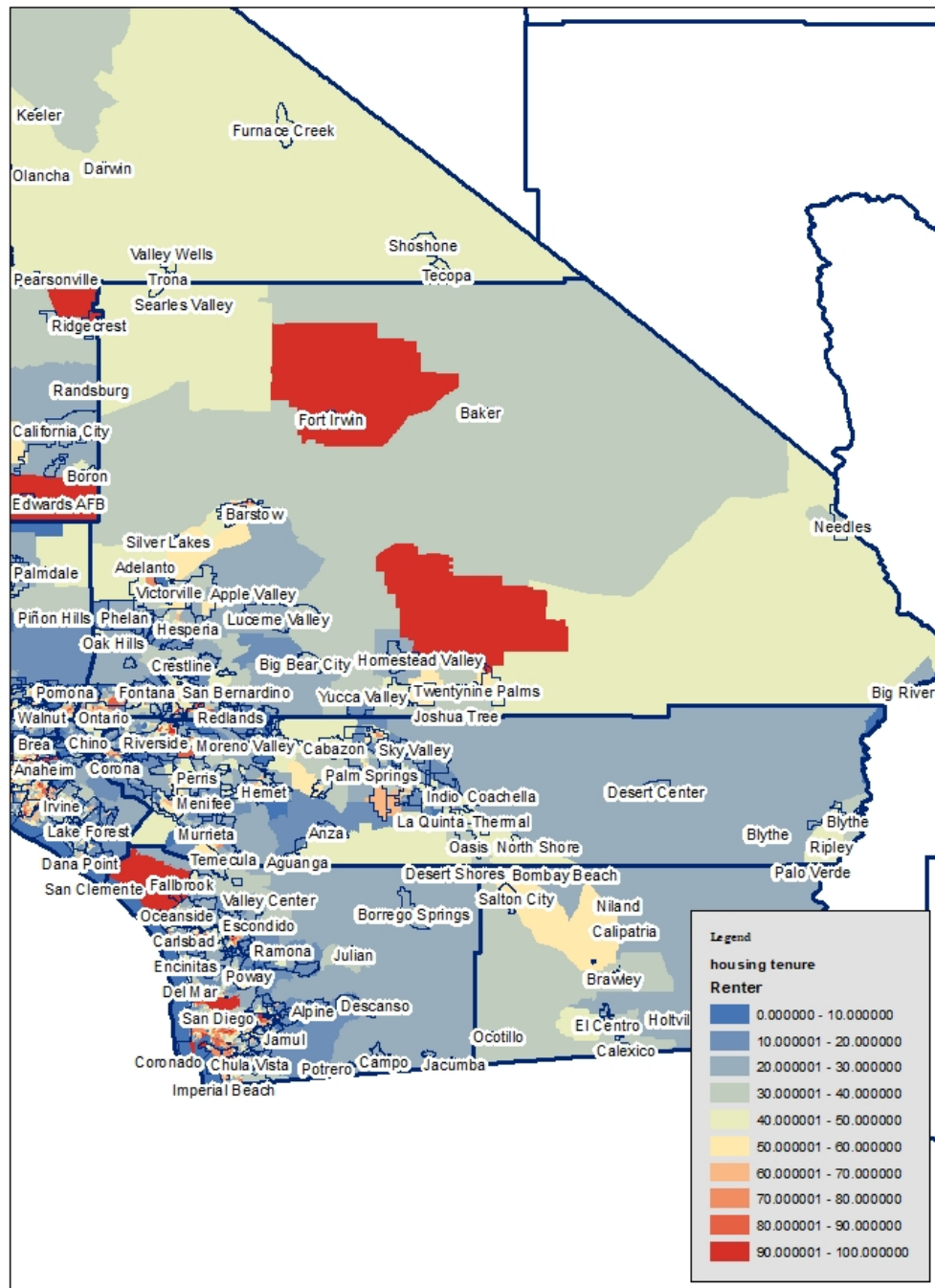
Map 9: Housing Tenure by Renters with R/ECAPs, Ontario



Map 10: Housing Tenure by Renters, Southern region



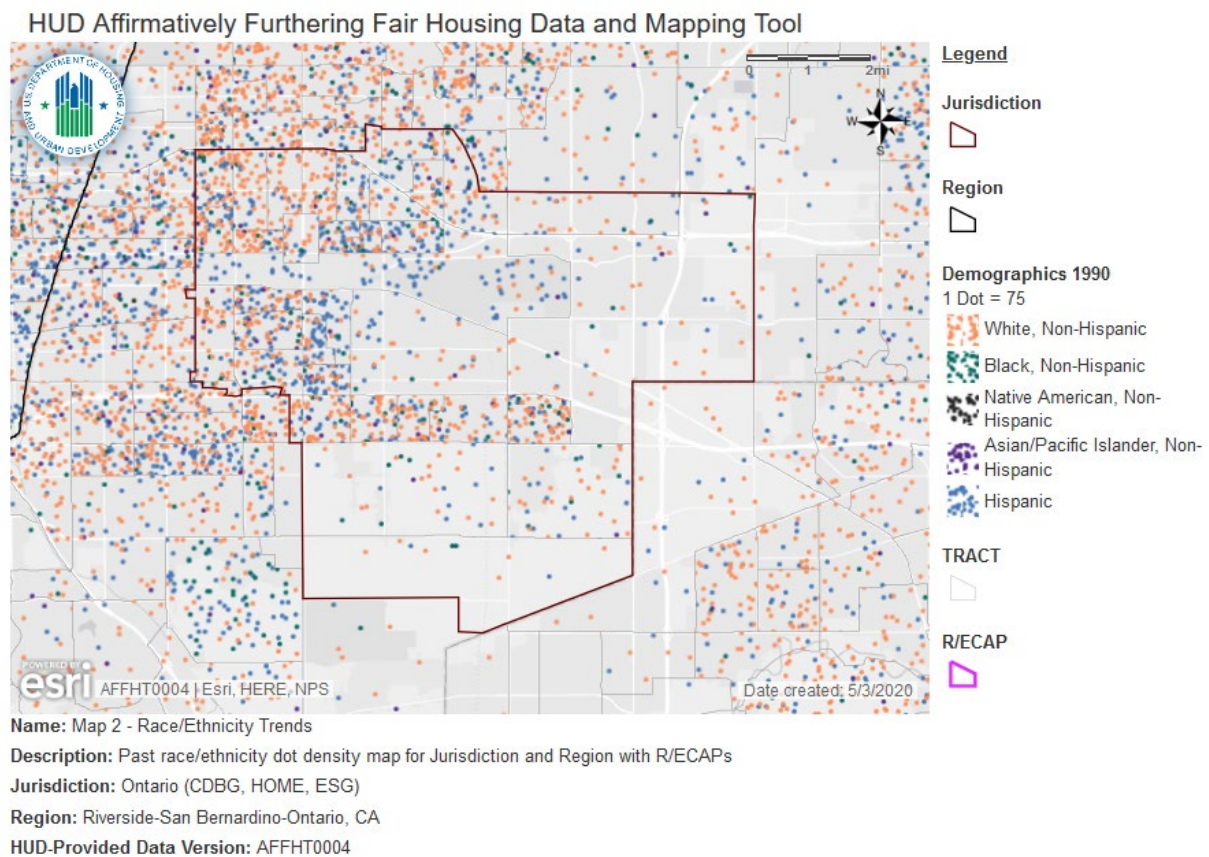
Map 11: Housing Tenure, region



In Maps 9, 10, and 11, red areas have higher percentages of renters while blue areas have higher percentages of owners. As shown in Map 9, Northern Ontario tends to have higher concentrations of renters, especially within its R/ECAPs, while southern Ontario has higher percentages of owners. Regionally, most areas have higher concentrations of owners than renters, with a few notable exceptions. Redlands, Moreno Valley, and Indian Wells all have higher percentages of renters, as do Fort Irwin and Homestead Valley.

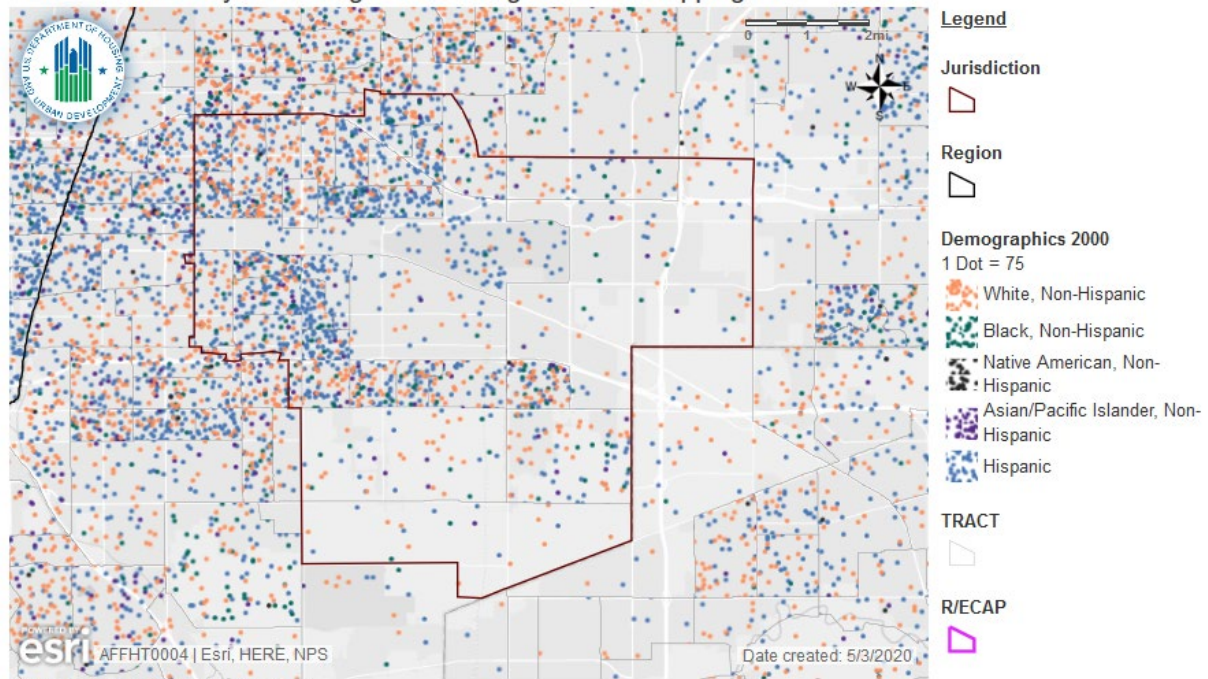
e. Discuss how patterns of segregation have changed over time (since 1990).

Map 12: Race/Ethnicity in 1990, Ontario CA



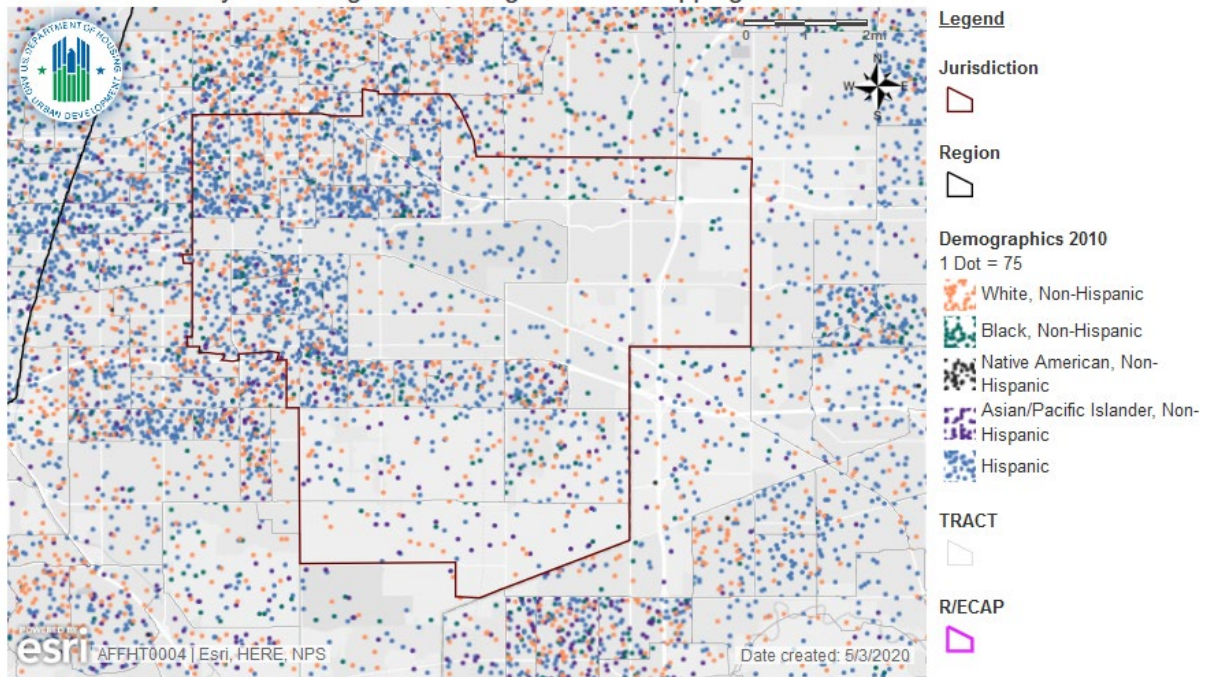
Map 13: Race/Ethnicity in 2000, Ontario CA

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Map 14: Race/Ethnicity in 2010, Ontario CA

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Name: Map 2 - Race/Ethnicity Trends

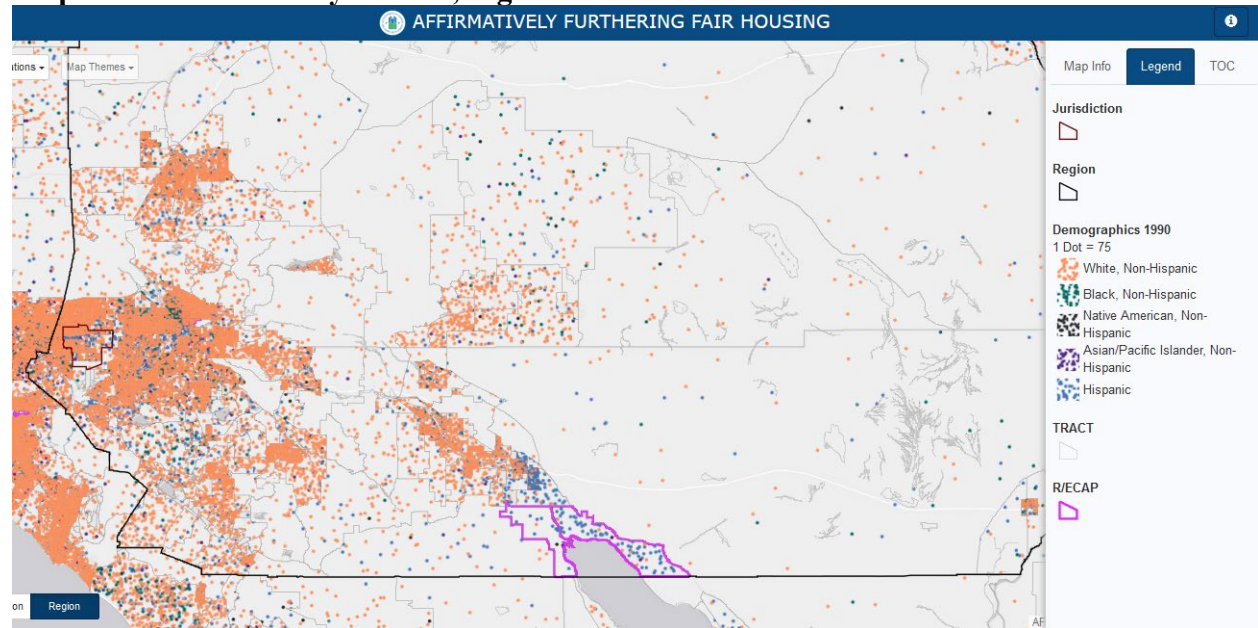
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Ontario (CDBG, HOME, ESG)

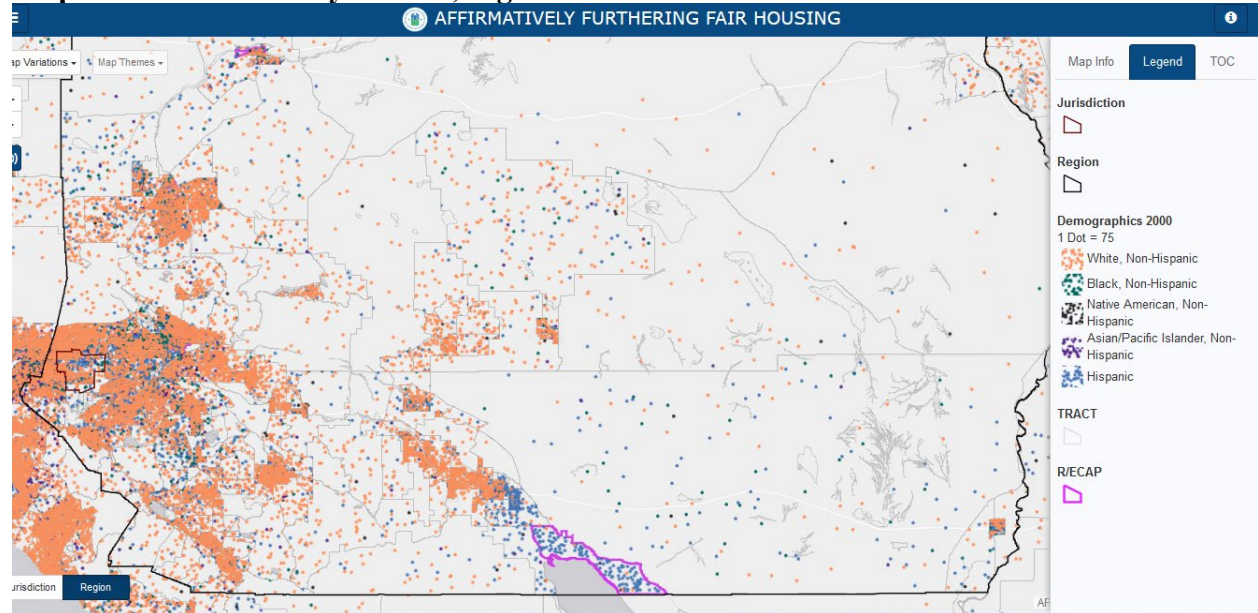
Region: Riverside-San Bernardino-Ontario, CA

HUD-Provided Data Version: AFFHT0004

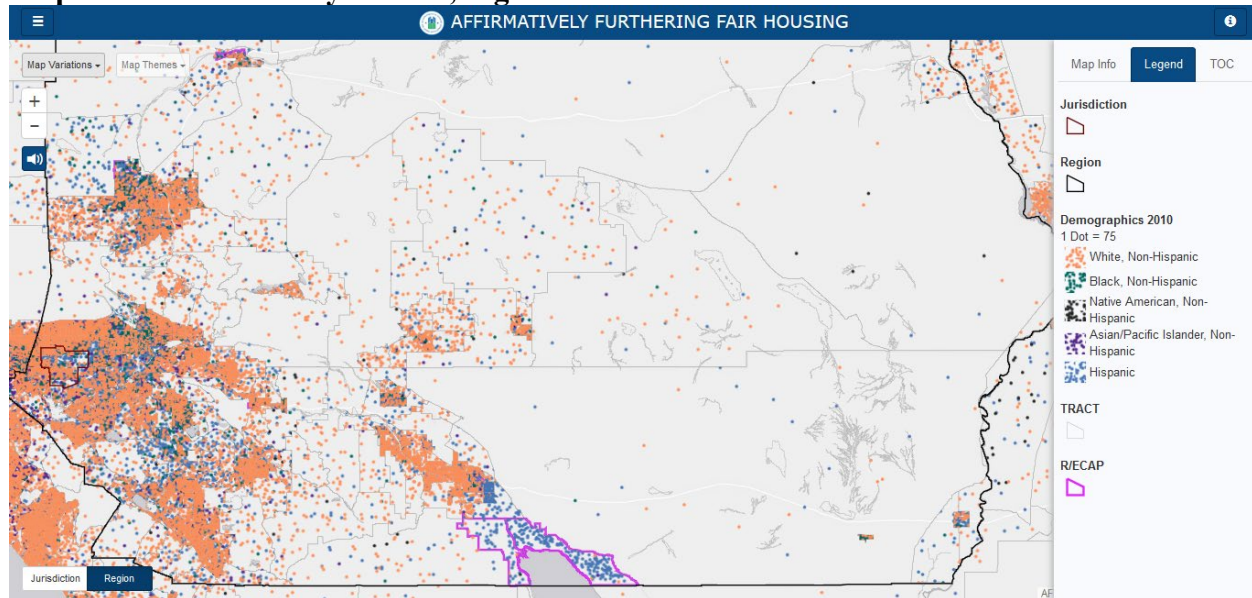
Map 15: Race/Ethnicity in 1990, region



Map 16: Race/Ethnicity in 2000, region



Map 17: Race/Ethnicity in 2010, region



The main trend present in residential patterns in the region is the increase in the Hispanic population across cities. Hispanic populations were small but significant in 1990. By the 2000s, the Hispanic population began to increase more rapidly, with the most significant growth between 2000 and 2010 (the most recent data available). There are fewer visible changes in residential patterns over the years, with Hispanic populations settling and expanding on the west side.

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

The City of Ontario has an increasing population of Hispanic residents and a decreasing White population. This may cause the region as a whole to experience higher rates of segregation because of the increasing concentration of one population.

2. Additional Information

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

HUD does not provide and the Census Bureau does not collect data concerning religious affiliation, but religion remains a prohibited basis for discrimination under the Fair Housing Act. Although the data discussed above with respect to national origin and LEP status can provide some insight into residential patterns with respect to religious given correlations between language, national origin, and religion, the resulting picture is merely a rough proxy. It is also a proxy that does not genuinely capture minority religious communities whose members are less likely to be recent immigrants.

The tables below, from USC's Center for Religion and Civic Culture, indicates the number of each type of religious center located in the county's jurisdictions. These numbers roughly correlate to residential patterns based on race/ethnicity and national origin. Areas with higher numbers of Roman Catholic centers indicate higher populations of Hispanic populations. Areas with renters tend to have higher non-White populations.

Table 7: Religious Centers, San Bernardino

Religious Center	San Bernardino County
Roman Catholic	55
Non-Denominational	208
Mormon	103
Southern Baptist	122
Seventh Day Adventist	58
Assemblies Of God	69
Muslim	14
Buddhist	10
National Baptist Convention	2
Lutheran	22
Grand Total	663

Source: USC's Center for Religion and Civic Culture

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.

Please see the Appendix for the following Contributing Factors to Segregation:

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific, neighborhoods, including services and amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Lack of public investment in specific, neighborhoods, including services and amenities

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

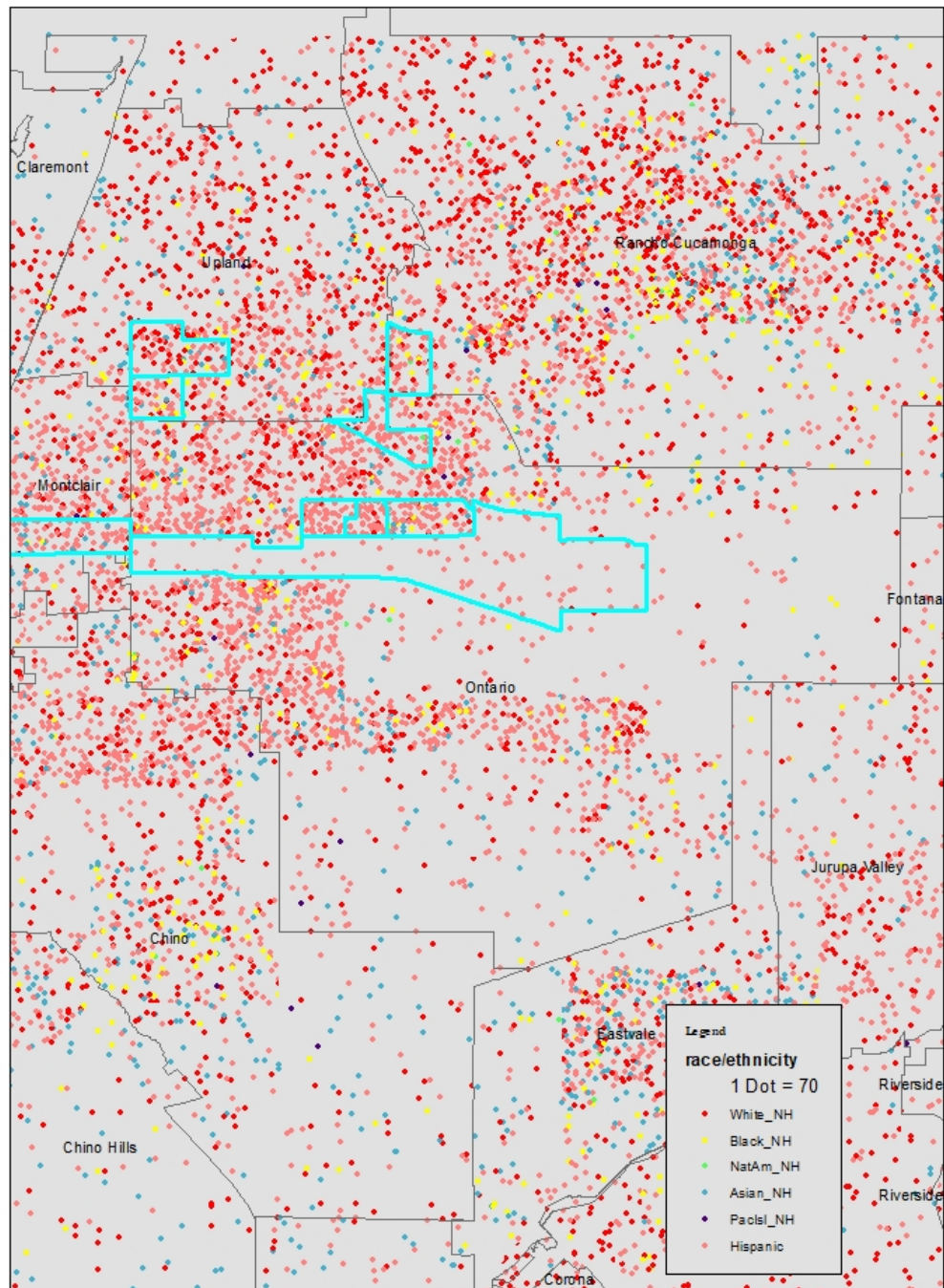
R/ECAPs are geographic areas with significant concentrations of poverty and minority populations. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower. **However, in this analysis, R/ECAPs are calculated at a 25% poverty rate threshold, which is more appropriate for California.**

Based on the population density found in Southern California, this document evaluates R/ECAPS using a 25% threshold, instead of the HUD threshold of 40% or more of individuals within a census tract that are living at or below the poverty limit. This regional threshold better illustrates areas that could be considered R/ECAPS, allowing policy makers to design policy and implement projects that take these areas into consideration.

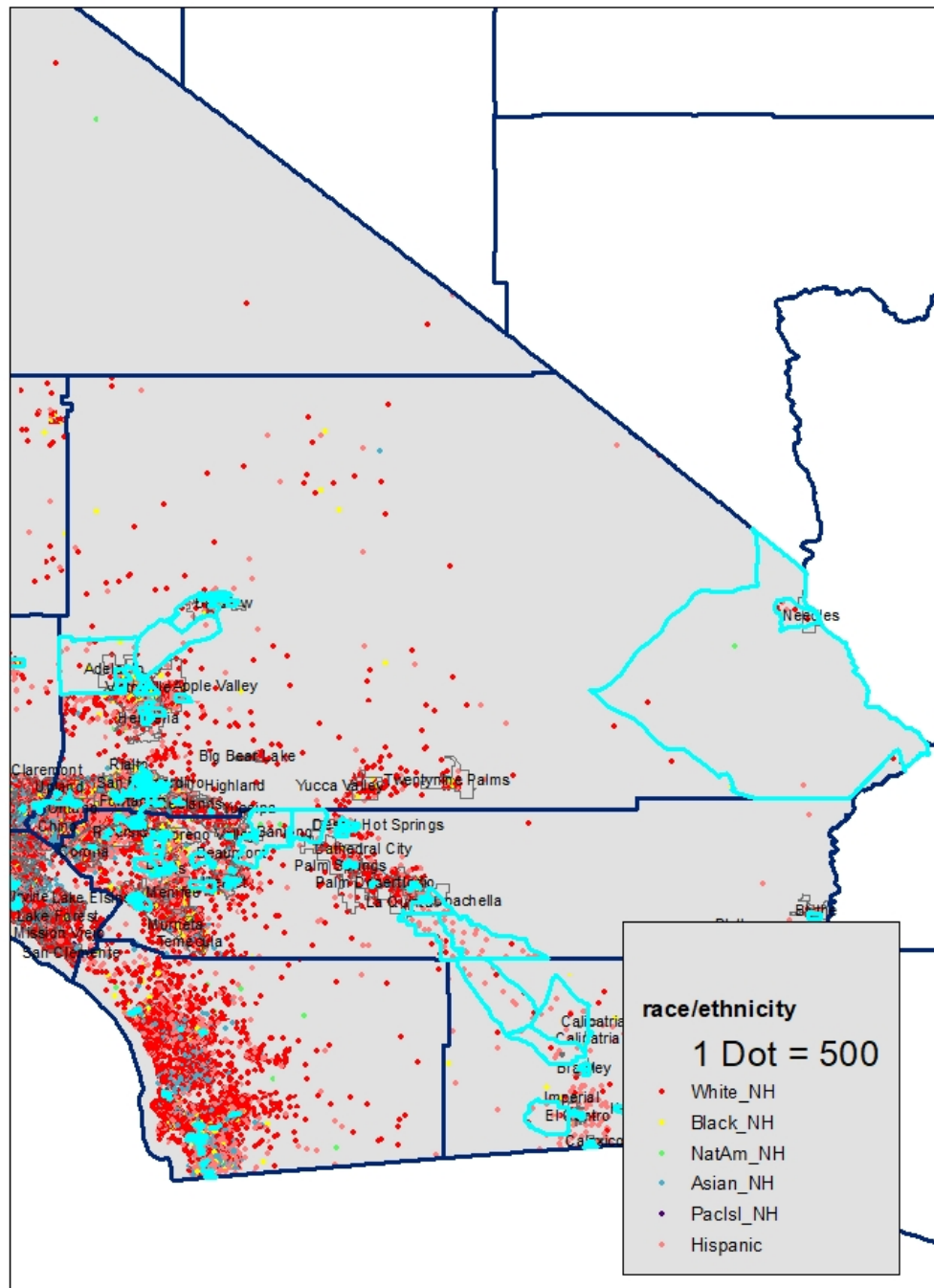
Where one lives has a substantial effect on mental and physical health, education, crime levels, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. Concentrated poverty is also associated with higher crime rates and worse health outcomes. However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers and access to public services. Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes. Overall, identifying R/ECAPs is important in order to better understand entrenched patterns of segregation and poverty.

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

Map 1: R/ECAPs in Ontario, CA



Map 2: R/ECAPs in region



There are five R/ECAPs in Ontario. Four of the five R/ECAPs in Ontario are adjacent to each other and the other. The area surrounding and including the Ontario International Airport is also a R/ECAP. R/ECAPS are composed primarily of Hispanic residents.

In the region, the R/ECAPS are located adjacent to Ontario in Upland, Montclair, and Rancho Cucamonga, north in the High Desert cities of Apple Valley, Hesperia, and Victorville, centrally in San Bernardino and its environs, in the east near Desert Hot Springs, and in the southeast in the Coachella Valley. Like in Ontario, R/ECAPS throughout the region are composed of predominantly Hispanic residents.

- b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?*

Table 1 - R/ECAP Demographics, Ontario

Ontario			
R/ECAP Race/Ethnicity		#	%
Total Population in R/ECAPs		24,235	
White, Non-Hispanic		1,484	6.12%
Black, Non-Hispanic		779	3.21%
Hispanic		20,682	85.34%
Asian or Pacific Islander, Non-Hispanic		972	4.01%
Native American, Non-Hispanic		56	0.23%
R/ECAP Family Type			
Total Families in R/ECAPs		6,688	
Families with children		2,968	44.38%
R/ECAP National Origin			
Total Population in R/ECAPs		24,235	
#1 country of origin	Mexico	7,586	31.30%
#2 country of origin	El Salvador	403	1.66%
#3 country of origin	Philippines	267	1.10%
#4 country of origin	Guatemala	247	1.02%
#5 country of origin	Indonesia	139	0.57%
#6 country of origin	Honduras	125	0.52%
#7 country of origin	Peru	90	0.37%
#8 country of origin	Taiwan	86	0.35%
#9 country of origin	India	79	0.33%
#10 country of origin	Korea	58	0.24%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the region level and are thus labeled separately.			
Note 2: Data Sources: Decennial Census; ACS 2013-2017 Estimates			
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).			

Table 2 - R/ECAP Demographics, region

Region		
R/ECAP Race/Ethnicity		%
Total Population in R/ECAPs		838,235
White, Non-Hispanic		139,995
Black, Non-Hispanic		73,358
Hispanic		576,457

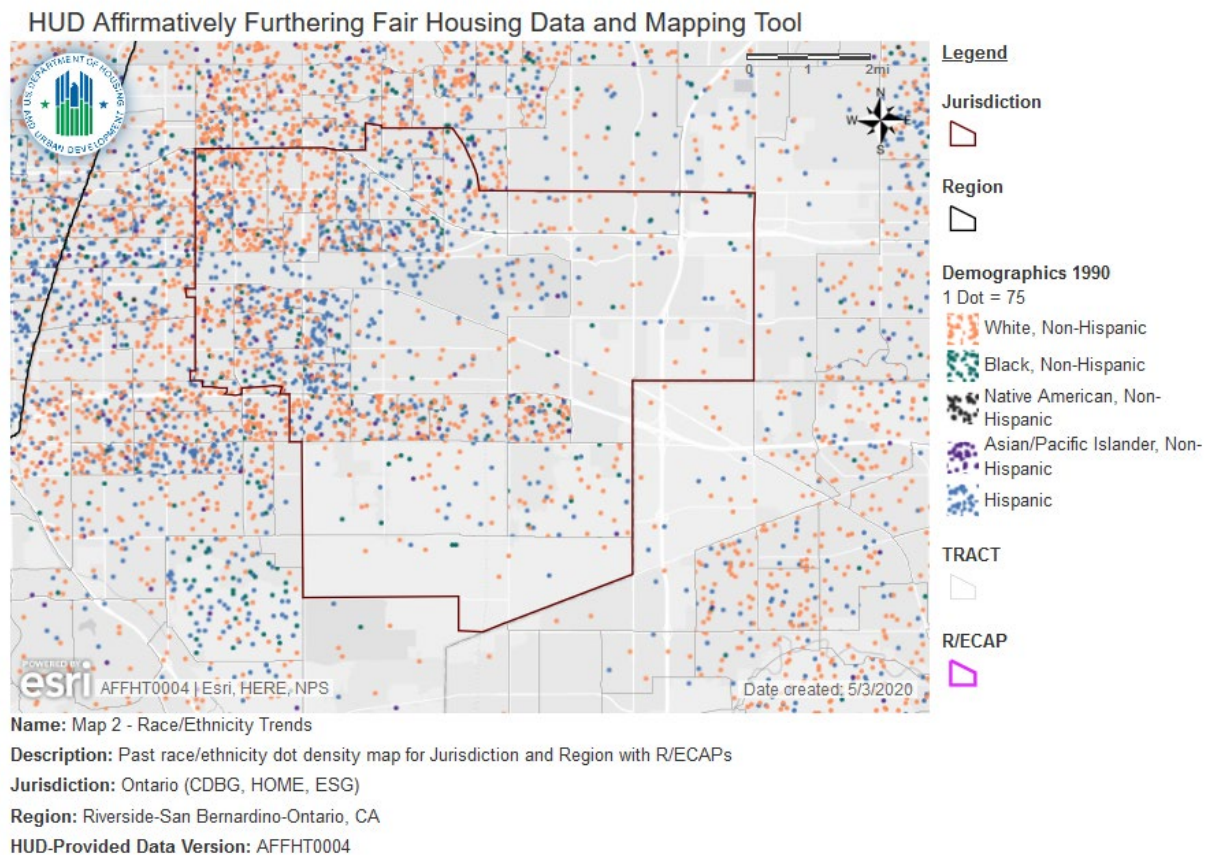
Asian or Pacific Islander, Non-Hispanic		29,442	3.51%
Native American, Non-Hispanic		4,503	5.37%
R/ECAP Family Type			
Total Families in R/ECAPs		170,176	
Families with children		92,883	54.58%
R/ECAP National Origin			
Total Population in R/ECAPs		838,235	
#1 country of origin	Mexico	164,789	19.66%
#2 country of origin	El Salvador	8,858	1.06%
#3 country of origin	Guatemala	7,232	0.86%
#4 country of origin	Philippines	5,418	0.65%
#5 country of origin	Vietnam	2,777	0.33%
#6 country of origin	Honduras	2,165	0.26%
#7 country of origin	China, excluding Hong Kong and Taiwan	1,606	0.19%
#8 country of origin	Nicaragua	1,417	0.17%
#9 country of origin	Canada	1,077	0.13%
#10 country of origin	Korea	993	0.12%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the region level and are thus labeled separately.			
Note 2: Data Sources: Decennial Census; ACS 2013-2017 Estimates			
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).			

The Ontario R/ECAPs primarily contain a significant number of Hispanic residents; 85% are Hispanic. 6.12% of residents are White, 4.01% Asian or Pacific Islanders, 4.01%, 3.21% are Black, and 0.23% are Native American. 44.38% of households are families with children. The most populous countries of origin, in order, are Mexico at 31.30% of the total population, El Salvador at 1.66%, Philippines at 1.10%, Guatemala at 1.02%, Indonesia at 0.57%, Honduras at 0.52%, and Peru at 0.37%.

In the region, R/ECAPS also contain a large number of Hispanic residents. 68.77% are Hispanic. 16.70% of residents are white, 8.75% are Black, 5.37% are Native American, and 3.51% are Asian or Pacific Islanders. 54.58% of households are families with children. The most populous countries of origin, in order, are Mexico at 19.66% of the total population, El Salvador at 1.06%, Guatemala at 0.86%, Philippines at 0.65%, Vietnam at 0.33%, Honduras at 0.26%, China excluding Hong Kong and Taiwan at 0.19%, Nicaragua at 0.17%, Canada at 0.13%, and Korea at 0.12%.

- c. Describe how R/ECAPs have changed over time in the jurisdiction and the region (since 1990).*

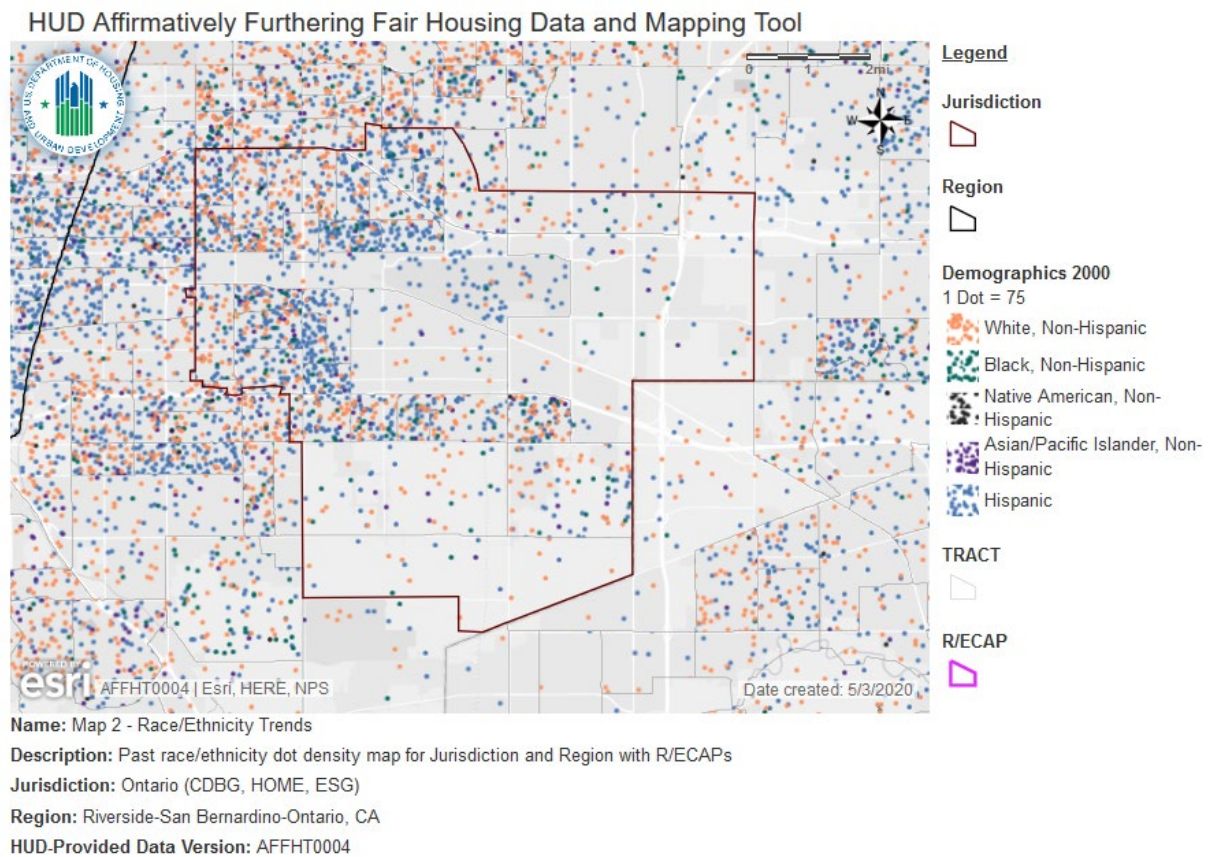
Map 3: R/ECAPs 1990, Ontario CA



In 1990, there were no R/ECAPs present in Ontario. For HUD-provided maps like Map 3, HUD calculates R/ECAPs at 40% or more of individuals are living at or below the poverty limit while this report calculates R/ECAPs at 25% or more. Therefore, it is possible that there would have been R/ECAPS in Ontario in 1990 had a 25% threshold been used.

As noted earlier, based on the population density found in Southern California, this document evaluates R/ECAPS using a 25% threshold, instead of the HUD threshold of 40% or more of individuals within a census tract that are living at or below the poverty limit. This regional threshold better illustrates areas that could be considered R/ECAPS, allowing policy makers to design policy and implement projects that take these areas into consideration.

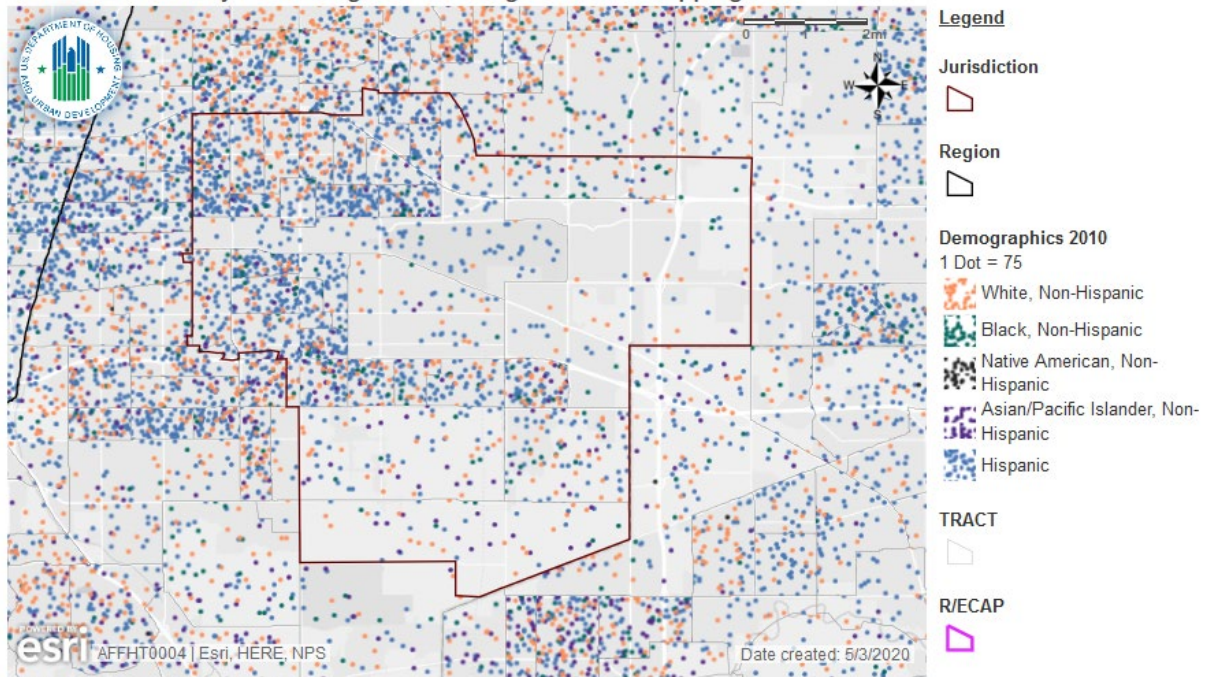
Map 4: R/ECAPs 2000, Ontario CA



In 2000, there were also no R/ECAPs present in Ontario, based on HUD's threshold of 40% or more individuals living at or below the poverty line.

Map 5: R/ECAPs 2010, Ontario CA

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Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

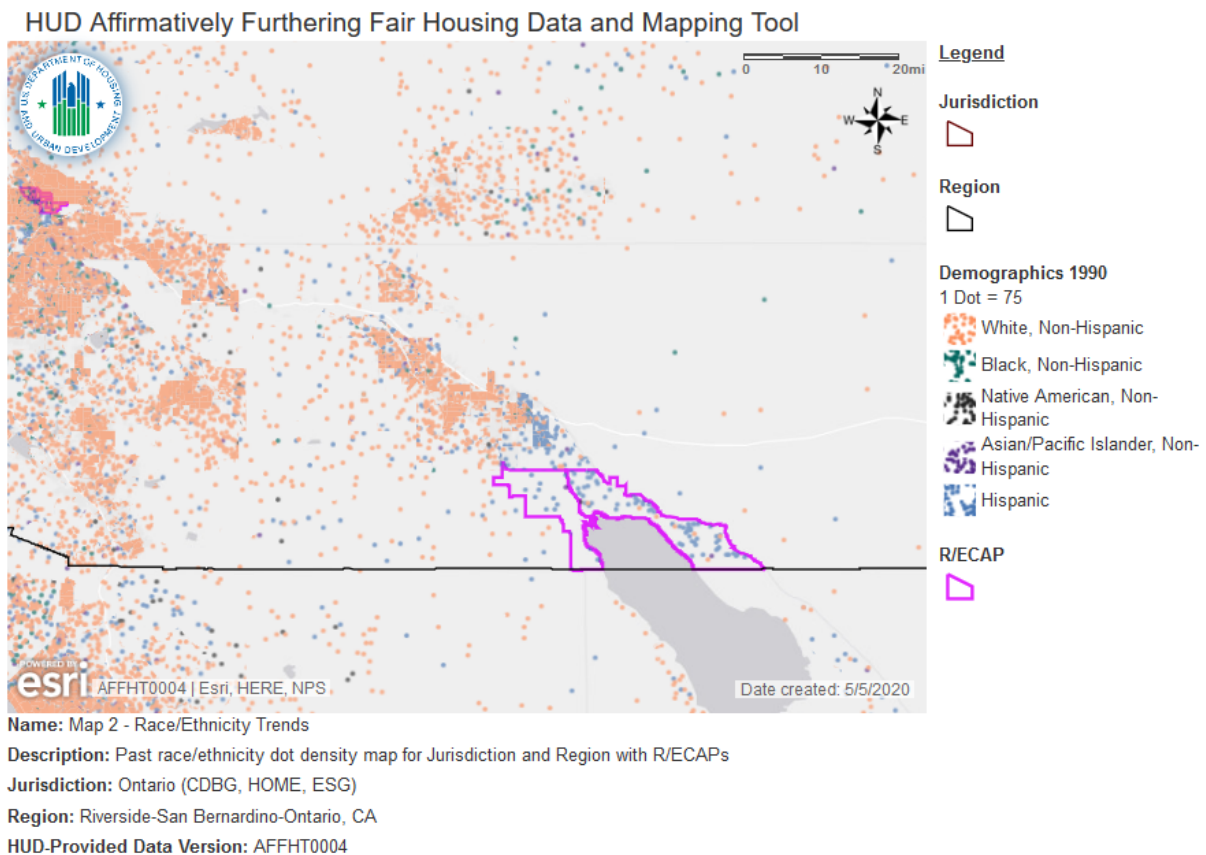
Jurisdiction: Ontario (CDBG, HOME, ESG)

Region: Riverside-San Bernardino-Ontario, CA

HUD-Provided Data Version: AFFHT0004

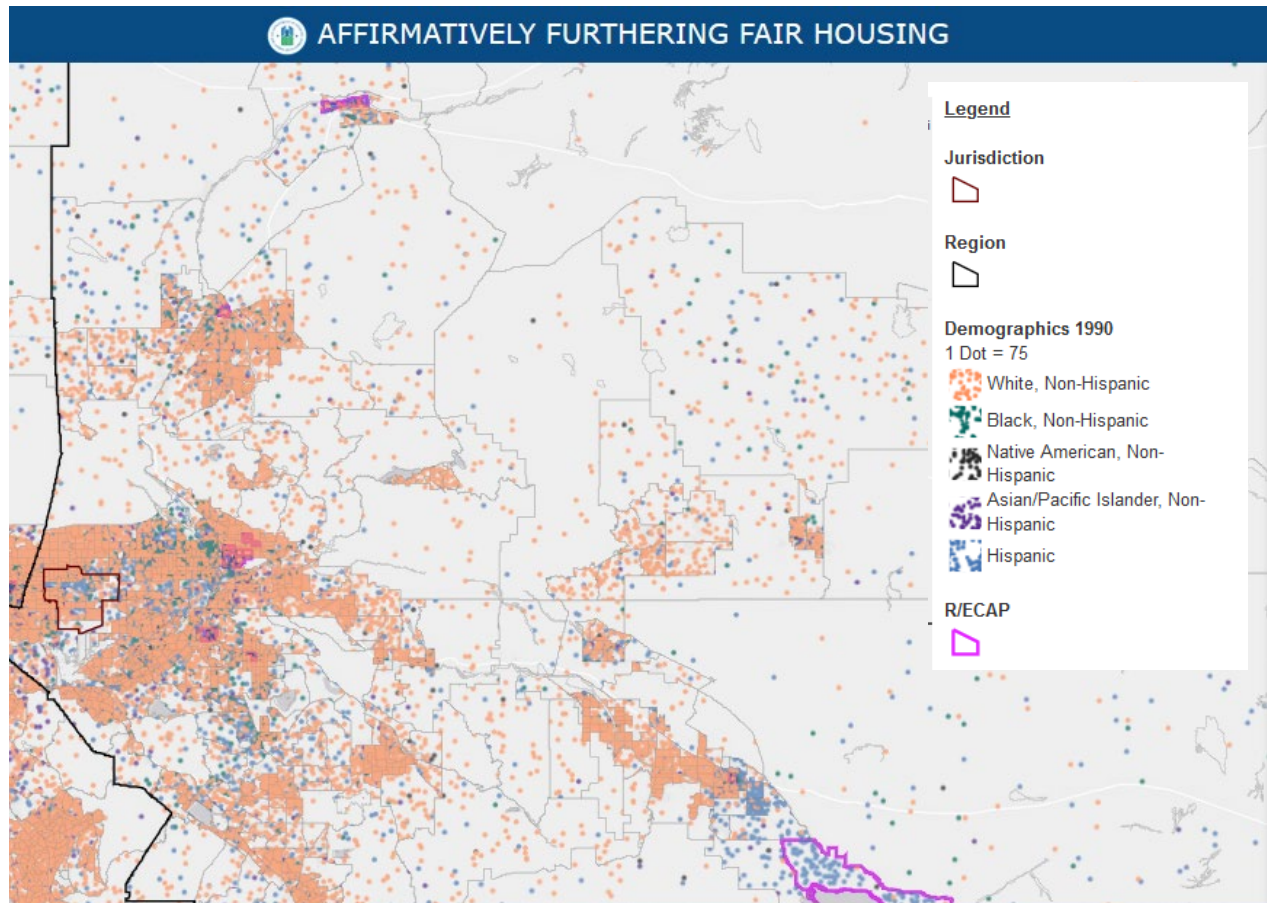
As in the prior two decades, there were also no R/ECAPs present in Ontario.

Map 6: R/ECAPs 1990, region



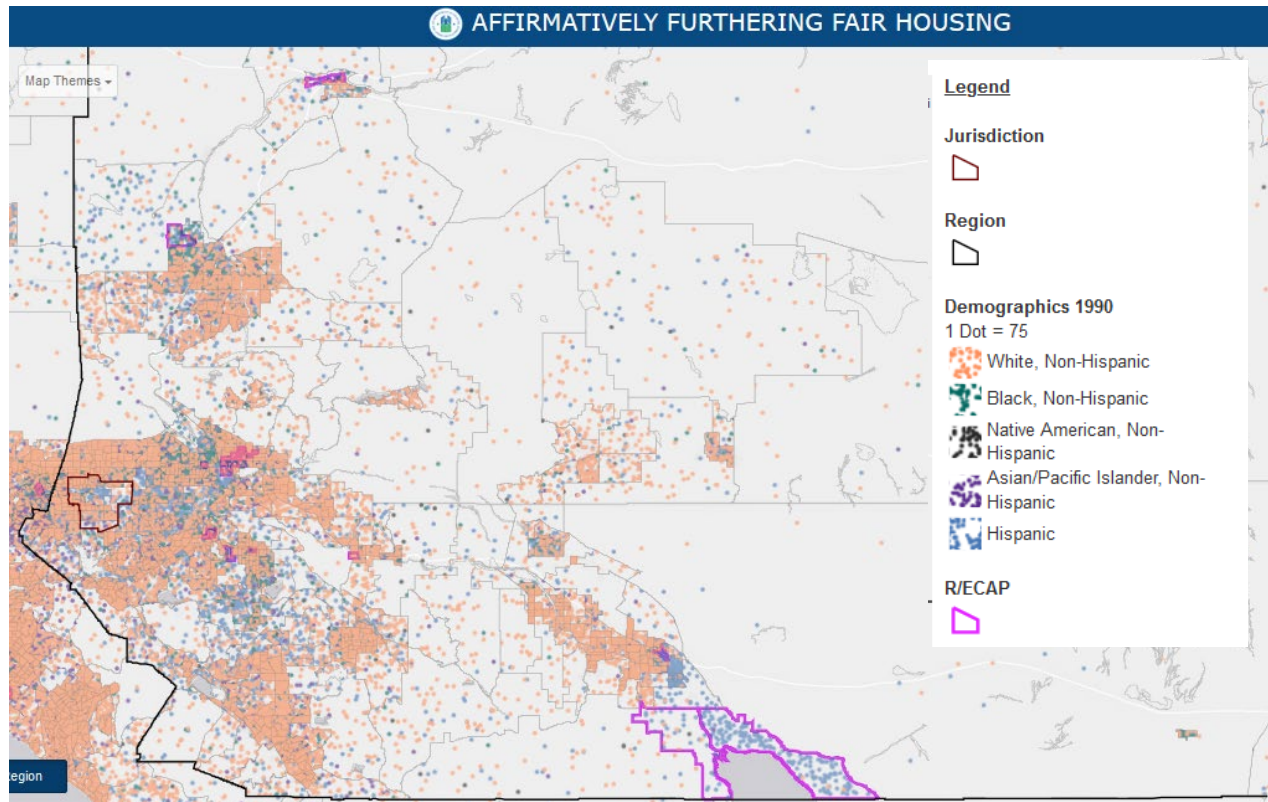
Using HUD's 40% or above threshold, there were twelve R/ECAPS in the region in 1990. Nine were contiguous in San Bernardino, two were adjacent to each other in Mecca and one was located in Indio.

Map 7: R/ECAPs 2000, region



In 2000, there were five additional R/ECAPs in addition to the previous twelve; two in Riverside, one in Moreno Valley, one in Victorville, and one in Barstow.

Map 8: R/ECAPs 2010, region



By 2010, there were additional R/ECAPs in both San Bernardino and in Moreno Valley, one in Rialto, one in Beaumont, and one in Adelanto, bringing the Regional total to 20. During this twenty-year period, only one Census Tract ceased to meet the R/ECAP criteria. All the areas with R/ECAPs in the maps above once again were present in the most current map of R/ECAPs, suggesting that these will be continued areas for concern in the future.

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.

Please see the Appendix for the following Contributing Factors to R/ECAPs:

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities

- Land use and zoning laws
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination

iii. Disparities in Access to Opportunity

1. Analysis

The following section describes locational differences and disparities experienced by different groups in accessing key features of opportunity: educational quality, economic factors, transportation, and environmental health. Access to neighborhoods with higher levels of opportunity can be more difficult due to discrimination and when there may not be a sufficient range and supply of housing in such neighborhoods. In addition, the continuing legacy of discrimination and segregation can impact the availability of quality infrastructure, educational resources, environmental protections, and economic opportunities, all of which can create disparities in access to opportunity.

In the maps and indices below, values are based on information available in the HUD AFFH-T Data Documentation.² However, all original data sources have been updated to the latest available version. All racial/ethnic information draws from American Community Survey 2013-2017 Estimates. Other sources include CAASP 2018-2019 Test Results; National Air Toxics Assessment (NATA) data, 2014; and Location Affordability Index (LAI) Version 3.0. School Proficiency values have been left unscaled. All other values are scaled to the Region.

Overall, Ontario's opportunity index values are higher than the surrounding region, meaning that there are fewer disparities in access to opportunity. As described in more detail below, the only exception is the environmental health index, which is generally lower in more densely-populated urban areas and higher in less-populated rural areas.

Table 1: Index Values, Ontario

	School Proficiency Index	Labor Market Engagement Index	Jobs Proximity Index	Low Transportation Cost Index	Environmental Health Index	Transit Trips Index
White	42.41	65.67	67.39	65.58	14.25	82.87
Black	41.04	67.48	69.64	71.81	14.01	87.03
Native American	40.67	44.46	69.82	81.90	13.81	89.41
Asian or Pacific Islander	43.72	64.52	62.21	61.90	12.45	79.72
Hispanic	41.07	64.88	70.34	70.13	15.77	86.27

² [https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-\(AFFHT0004a\)-March-2018.pdf](https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-(AFFHT0004a)-March-2018.pdf)

Table 2: Index Values, Region

	School Proficiency Index	Labor Market Engagement Index	Jobs Proximity Index	Low Transportation Cost Index	Environmental Health Index	Transit Trips Index
White	41.76	51.92	41.10	41.33	57.12	43.43
Black	38.90	50.07	43.60	48.18	47.48	49.36
Native American	34.47	43.81	35.34	43.44	60.60	41.26
Asian or Pacific Islander	48.09	61.62	45.25	42.65	41.01	53.83
Hispanic	38.13	50.37	47.01	51.19	44.56	52.62

a. Educational Opportunities

- i. Describe any disparities in access to proficient schools in the jurisdiction and region.*
- ii. Describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.*
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.*

The School Proficiency Index is based on proficiency rates of 4th grade students in math and language arts literacy. Scores in Ontario are slightly higher than scores in the region overall, and are fairly consistent across racial/ethnic groups. White residents have a score of 42.41, Black residents 41.04, Native American residents 40.67, Asian or Pacific Islander residents 43.72, and Hispanic residents 41.07. Map 26 indicates that the southern and western edges of Ontario have slightly higher school proficiency index values. Asian or Pacific Islander residents in the southern area of Ontario experience the highest school proficiency values, which is consistent with the tables.

Foreign-born residents tend to reside in areas with lower school proficiency index values. Mexican, Salvadoran, and Guatemalan residents in Ontario reside in the northwestern part of the city, which has middling School Proficiency Index values, while slightly higher concentrations of Filipino residents are found in the eastern part of Ontario, which has the lowest School Proficiency Index values.

Patterns of school proficiency in the region overall are presented with the caveat that index values are most accurate for the more urban areas of the region. The areas of Chino Hills, Lake Matthews, Temecula, Rancho Cucamonga, and Redlands have higher School Proficiency Index values. Chino Hills has a higher Asian or Pacific Islander population, but these areas are otherwise predominantly White compared to the region. Hispanic residents are densely populated in the area stretching through Riverside and Moreno Valley, and these areas have slightly lower School Proficiency Index values. Foreign-born residents in the region primarily reside in urban areas which have

School Proficiency Index data available, but in areas with lower index values, such as Moreno Valley and San Bernardino.

b. Employment Opportunities

- i. Describe any disparities in access to employment in the jurisdiction and region.*
- ii. Describe how the disparities in access to employment relate to residential living patterns in the jurisdiction and region.*
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to employment.*

The Labor Market Engagement Index and the Jobs Proximity Index are used to measure the strength of the labor market and location of available jobs. Overall, Ontario has higher values than the region in both measures, and values are mostly similar across race/ethnicity. White residents in Ontario experience a Labor Market Engagement Index value of 65.67, Black residents 67.48, Hispanic residents 64.88, Asian or Pacific Islander residents 64.52, and Native American residents 44.46. White residents experience a Jobs Proximity Index value of 67.39, Hispanic residents 70.34, Black residents 69.64, Native American residents 69.82, and Asian or Pacific Islander residents 62.21. The more populated, predominantly Hispanic northwest area of Ontario has lower Labor Market Engagement Index values as opposed to the rest of the city. Foreign-born residents are also more likely to experience these lower values. On the other hand, the southern border of Ontario experiences the lowest Jobs Proximity Index values, but is also more sparsely populated.

Regionally, Asian or Pacific Islander residents experience the highest Labor Market Engagement Index value at 61.62, followed by White residents at 51.92, Hispanic residents at 50.37, Black residents at 50.07, and Native American residents at 43.81. Hispanic residents experience the highest Jobs Proximity Index value at 47.01, followed by Asian or Pacific Islander residents at 45.25, Black residents at 43.60, White residents at 41.10, and Native American residents at 35.34. Ontario has higher Jobs Proximity Index values than much of the region. In the region, Black and Hispanic residents live closer to urban areas with higher Jobs Proximity and Labor Market Engagement Index values, leading to overall similar values across race/ethnicity.

c. Transportation Opportunities

- i. Describe any disparities in access to transportation in the jurisdiction and region.*
- ii. Describe how the disparities in access to transportation relate to residential living patterns in the jurisdiction and region.*
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to transportation.*

The two Indices used to measure access to transportation are the Low Transportation Cost Index and Transit Trips Index. The Low Transportation Cost Index measures access to low-cost transportation services, and the Transit Trips Index measures how often residents take transit trips. Values are much higher in Ontario than in the region, because Ontario is much more urban and centrally located than other areas of the region.

In Ontario, Native American residents have the highest Low Transportation Cost Index value at 81.90, followed by Black residents at 71.81, Hispanic residents at 70.13, White residents at 65.58, and Asian or Pacific Islander residents at 61.90. Similarly, Native American residents experience the highest Transit Trips Index value at 89.41, followed by Black residents at 87.03, Hispanic residents at 86.27, White residents at 82.87, and Asian or Pacific Islander residents at 79.72. These patterns are also reflected in the maps. The northwest area of Ontario has the highest Low Transportation Cost Index values and is also generally more populated. Similarly, many foreign-born residents reside primarily in these areas.

Regionally, Hispanic residents experience the highest Low Transportation Cost Index value at 51.19, followed by Black residents at 48.18, Native American residents at 43.44, and Asian or Pacific Islander residents at 42.65. Asian or Pacific Islander residents experience the highest Transit Trips Index value, followed by Hispanic residents at 52.62, Black residents at 49.36, White residents at 43.43, and Native American residents at 41.26. This is consistent with the information displayed in the maps for the most part, as Black and Hispanic residents tend to reside in more urban areas of the region. Asian or Pacific Islander residents experience the highest Transit Trips Index value but the lowest Low Transportation Cost Index value. As they disproportionately reside in Chino Hills and Rancho Cucamonga, this is also consistent with the patterns seen in the maps. Foreign-born residents, especially Mexican residents, tend to reside in areas with especially high Low Transportation Cost Index values.

d. Environmentally Healthy Neighborhoods Opportunities

- i. Describe any disparities in access to environmental health in the jurisdiction and region.*
- ii. Describe how the disparities in access to environmental health relate to residential living patterns in the jurisdiction and region.*
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to environmental health.*

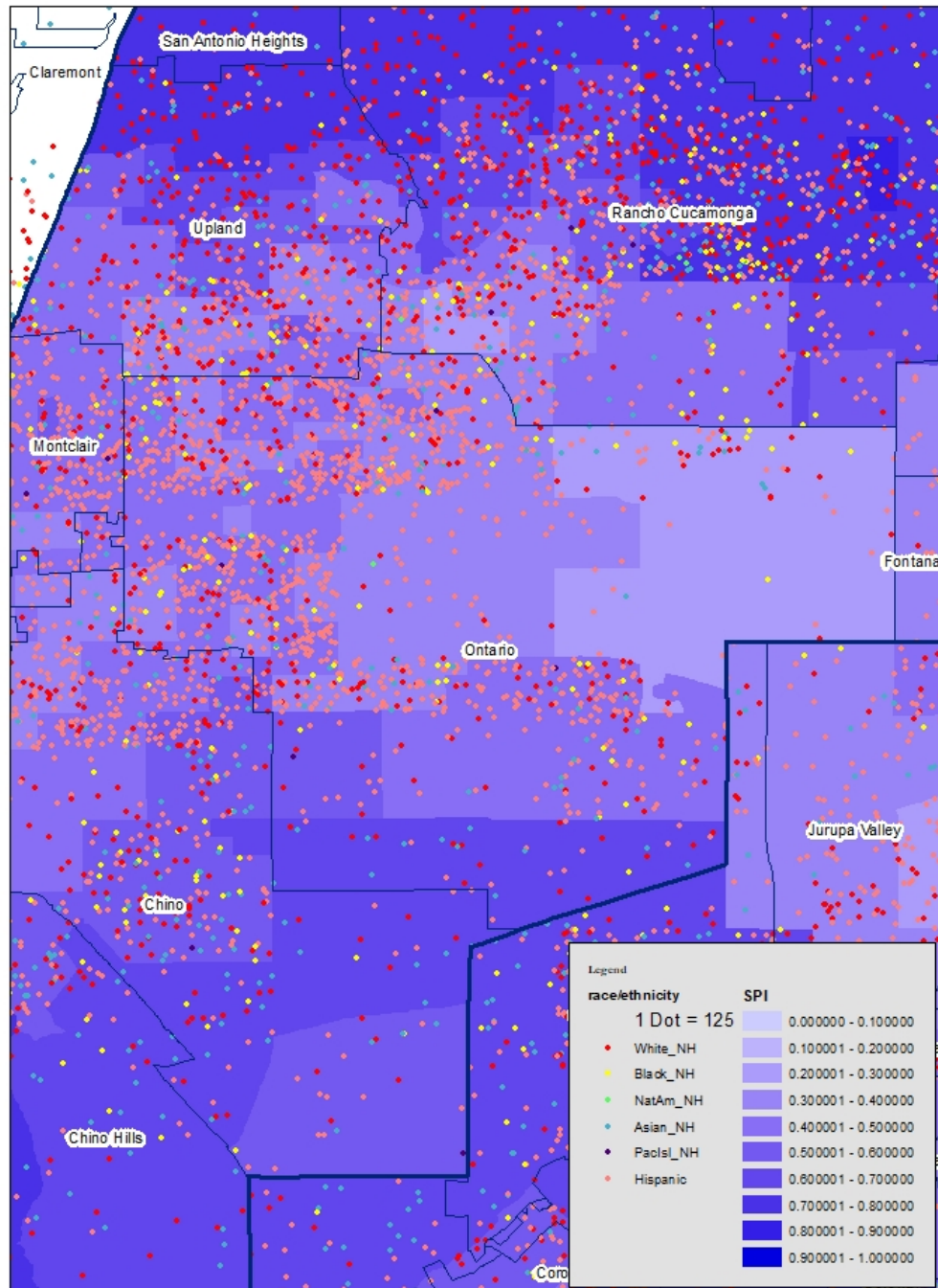
The Environmental Health Index accounts for respiratory and neurological risk factors across the region. Environmental Health Index values are drastically lower for Ontario than for the region. This is likely because the region includes a great deal of rural space which has less pollution overall. Environmental Health Index values are fairly consistent across demographic groups in Ontario, with White residents experiencing a value of 14.25, Black residents 14.01, Native American residents 13.81, Asian or Pacific Islander residents 12.45, and Hispanic residents 15.77. Conversely, in the region, Native American residents experience the highest value at 60.60,

followed by White residents at 57.12, Black residents at 47.48, Hispanic residents at 44.56, and Asian or Pacific Islander residents at 44.56.

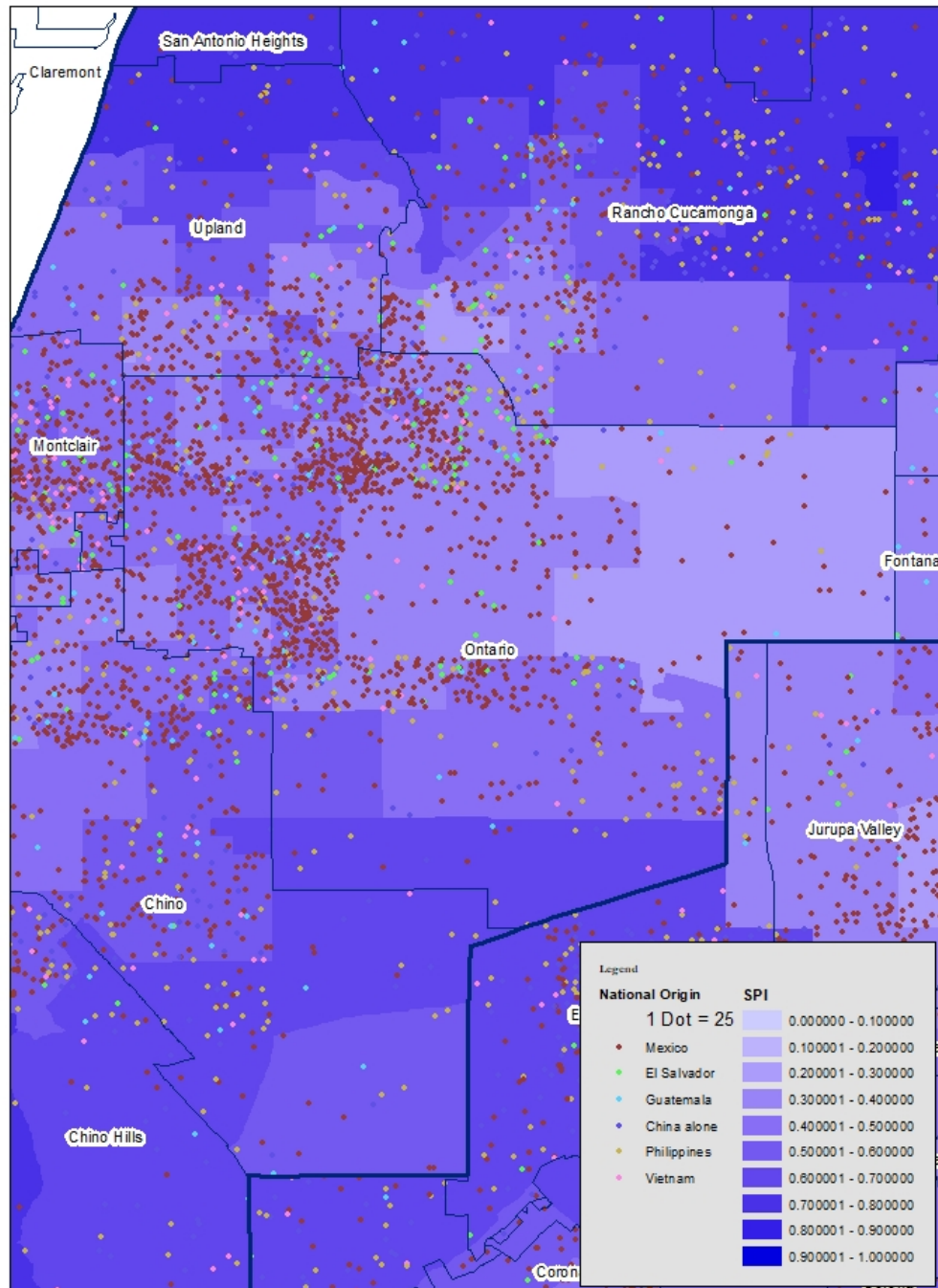
These patterns are consistent with the data presented in the maps, as well. The northwestern area of Ontario experiences the highest index values. These areas include Ontario's R/ECAPs, and higher populations of Black and Hispanic residents. Asian or Pacific Islander residents in the southern half of Ontario are exposed to areas with lower Environmental Health Index values. Additionally, foreign-born residents are more present in the northwestern area of Ontario as well, and have more access to environmentally healthy spaces.

Regionally, the discrepancies in Environmental Health across the region are visible in the sharp split between urban and rural areas. Environmental health is lowest in the more urban areas around Ontario, higher in the cities of San Bernardino and Moreno Valley, and at its highest in the rural areas of the region. Noticeably, the Palm Springs area has high Environmental Health Index values compared to other urban areas of the region.

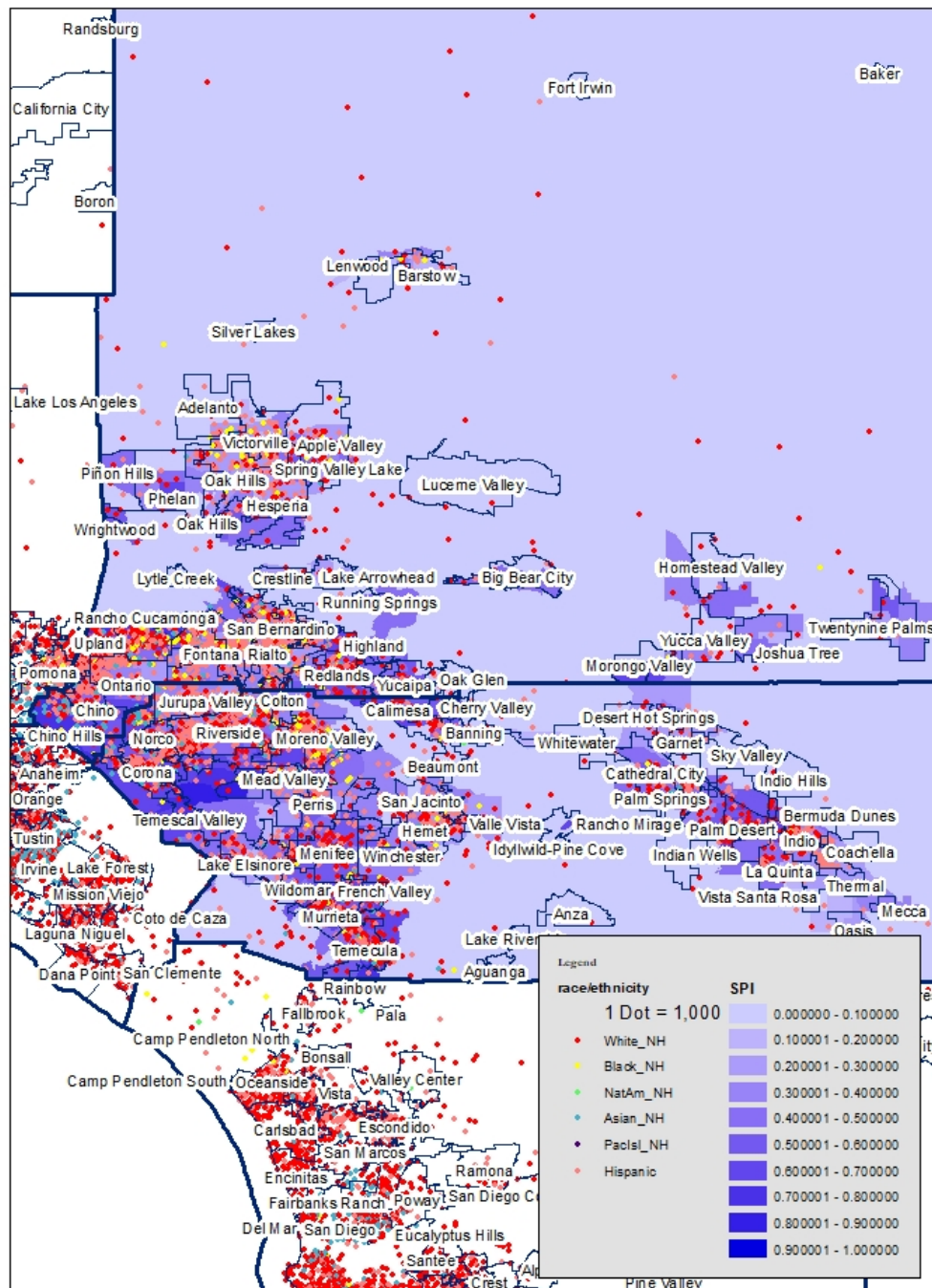
Map 1: School Proficiency Index, Ontario, Race



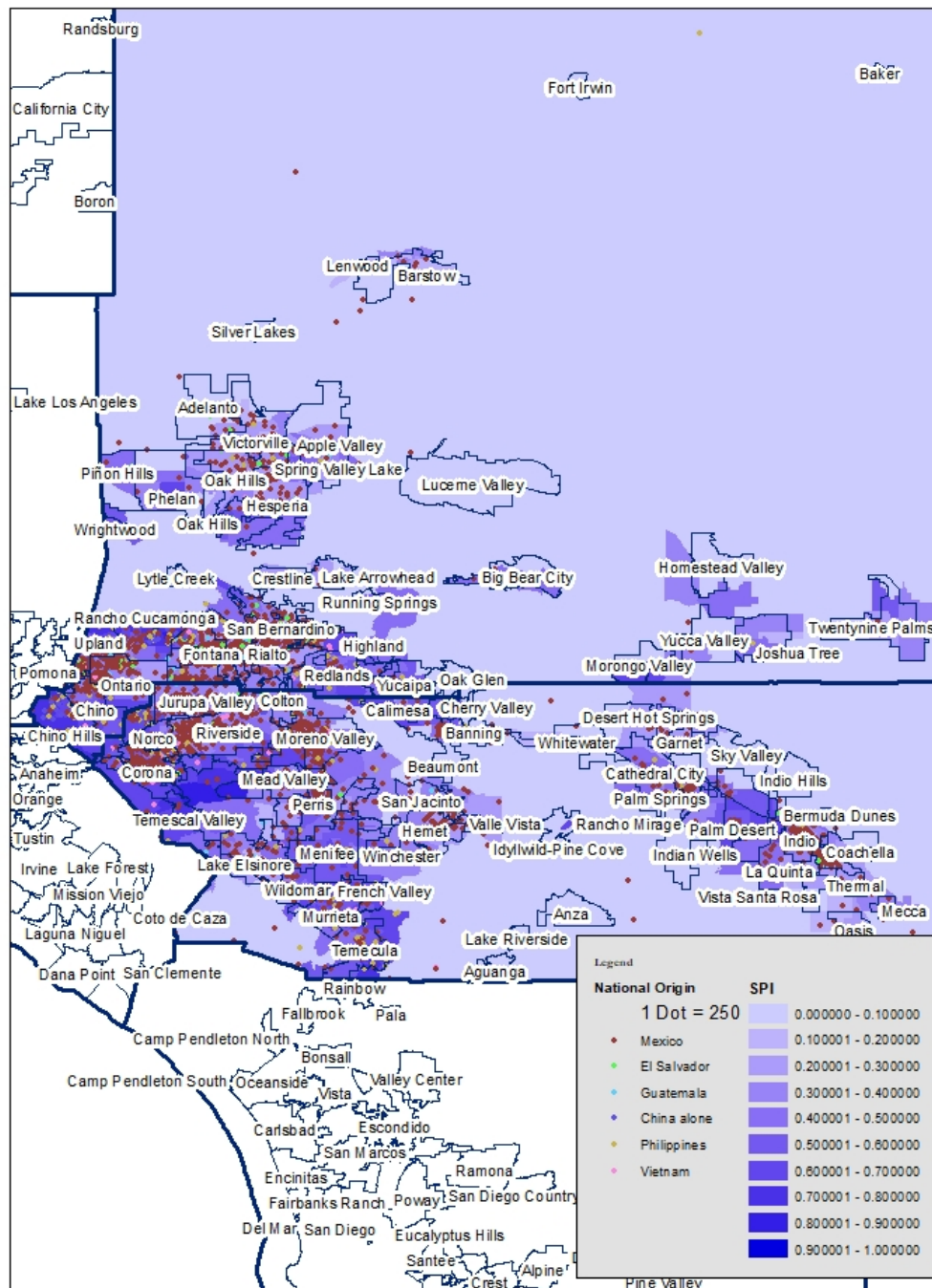
Map 2: School Proficiency Index, Ontario, National Origin



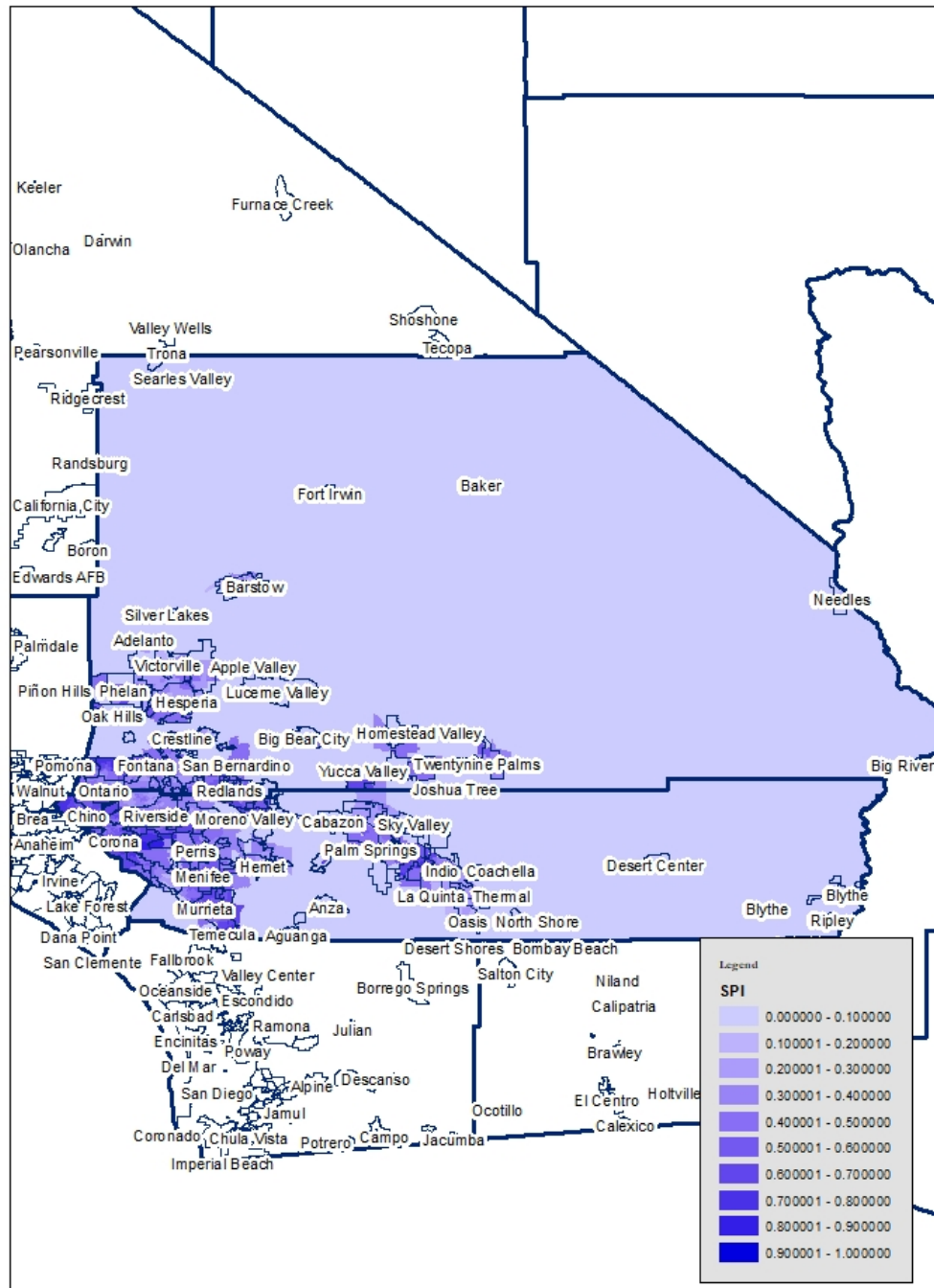
Map 3: School Proficiency Index, Southern region, Race



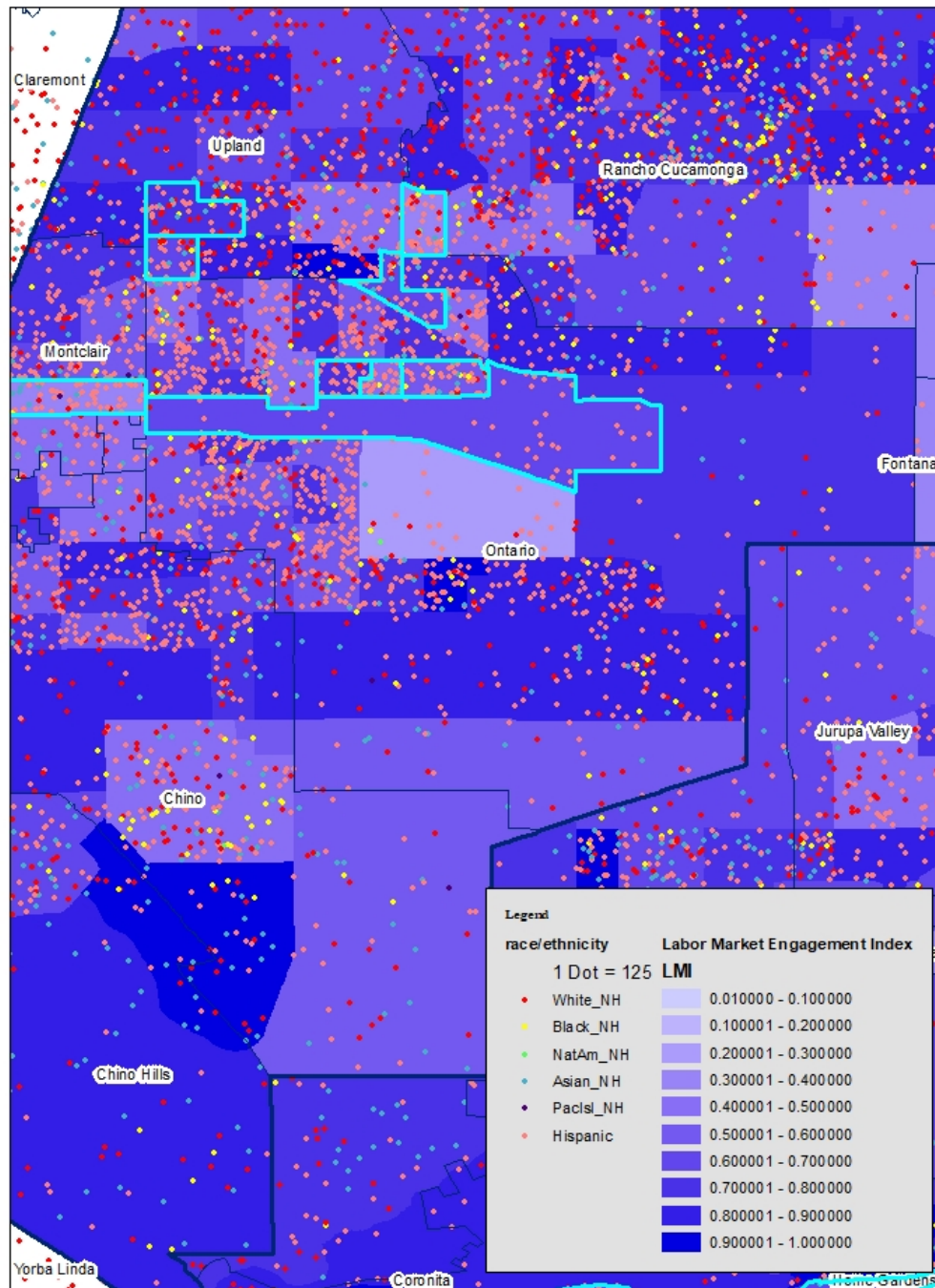
Map 4: School Proficiency Index, Southern region, National Origin



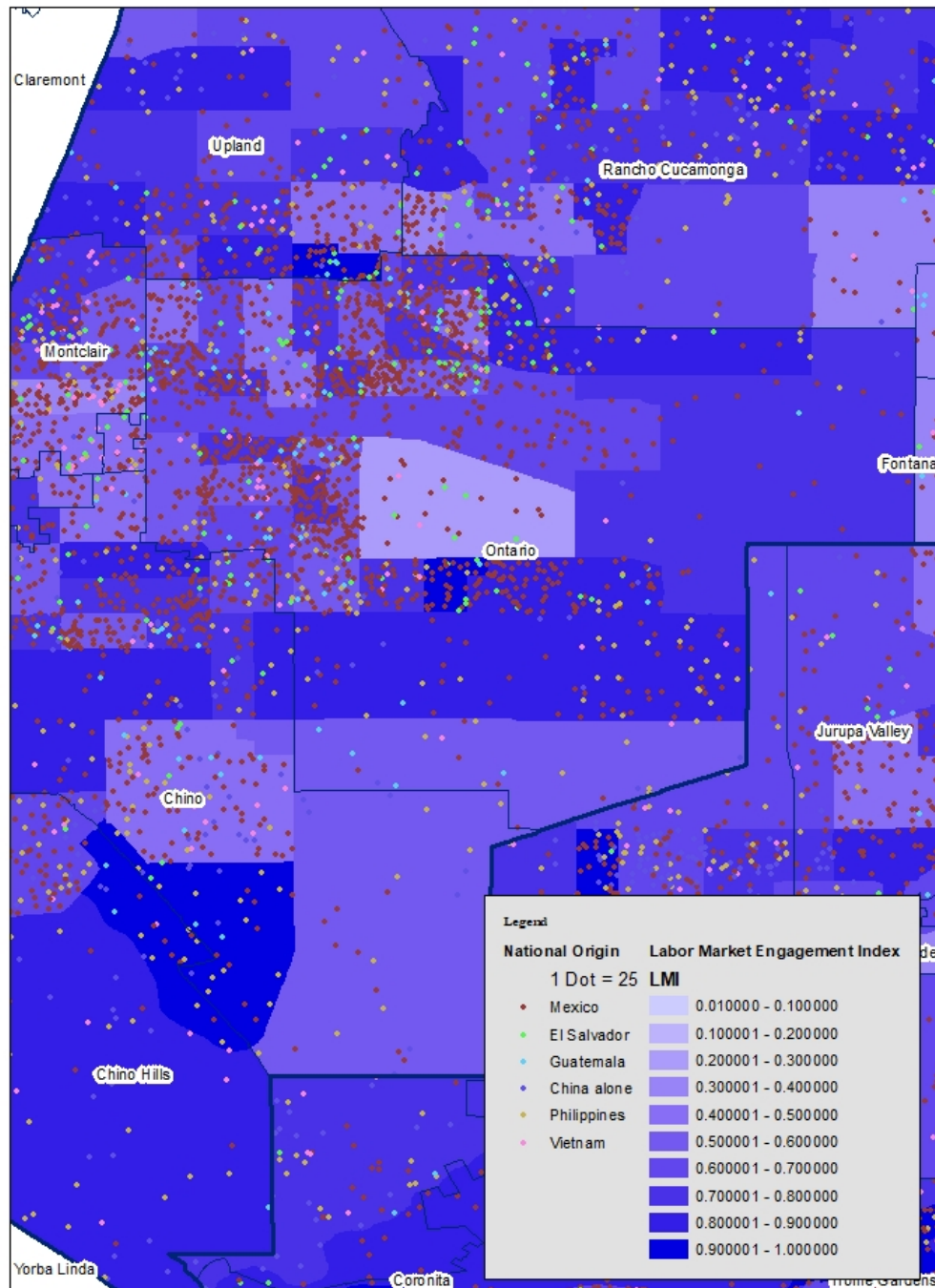
Map 5: School Proficiency Index, region



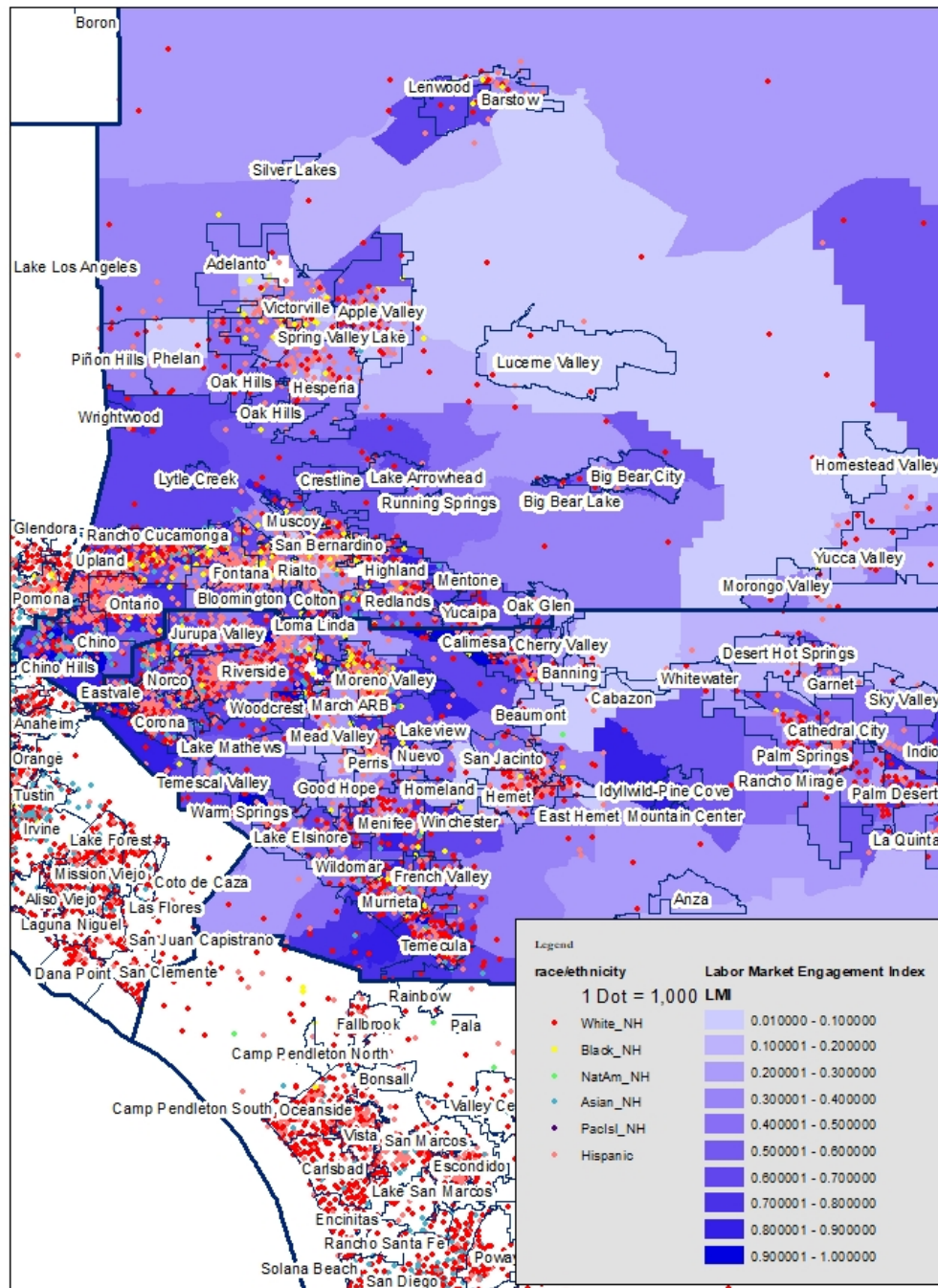
Map 6: Labor Market Engagement Index, Ontario, Race



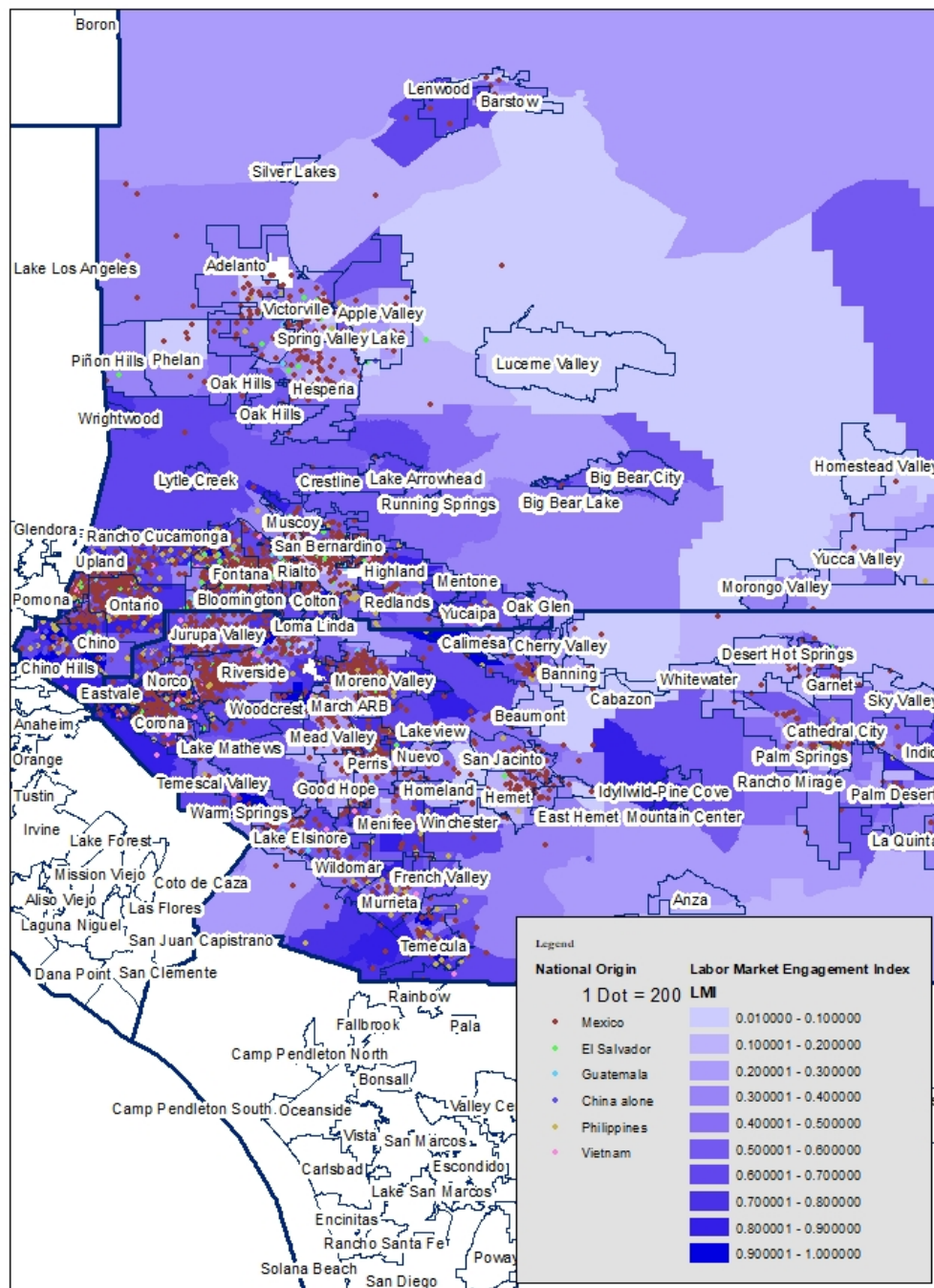
Map 7: Labor Market Engagement Index, Ontario, National Origin



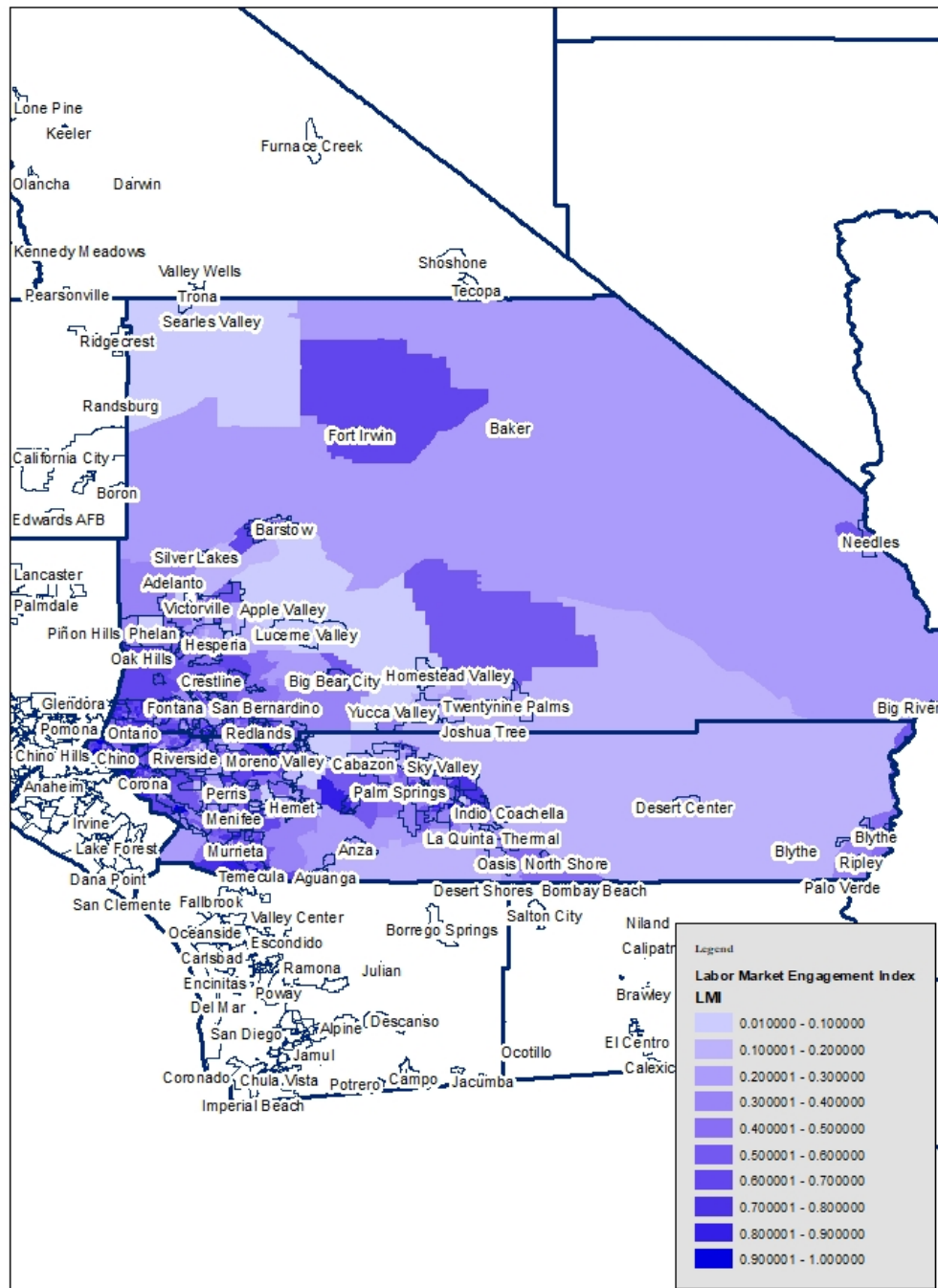
Map 8: Labor Market Engagement Index, Southern region, Race



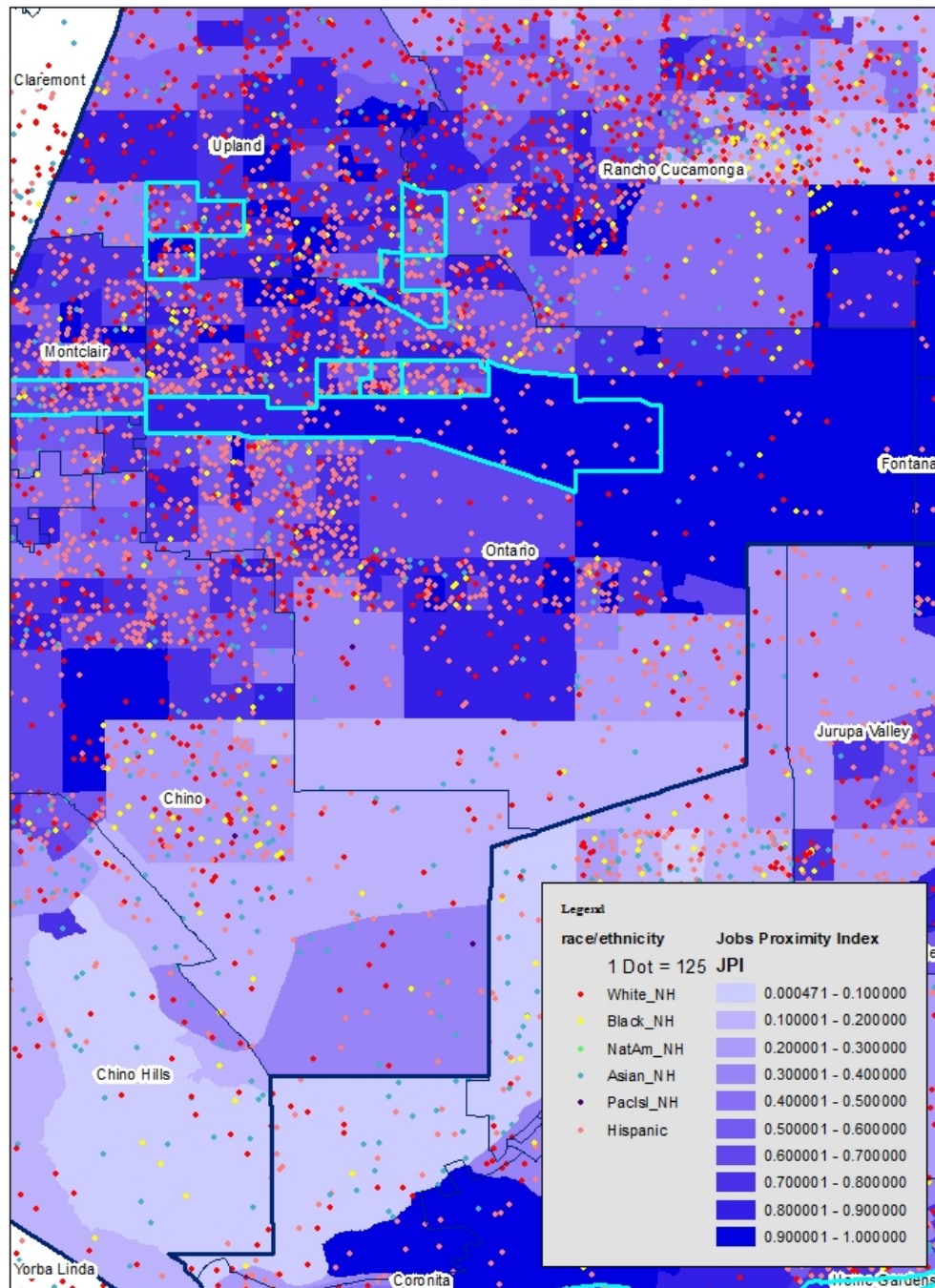
Map 9: Labor Market Engagement Index, Southern region, National Origin



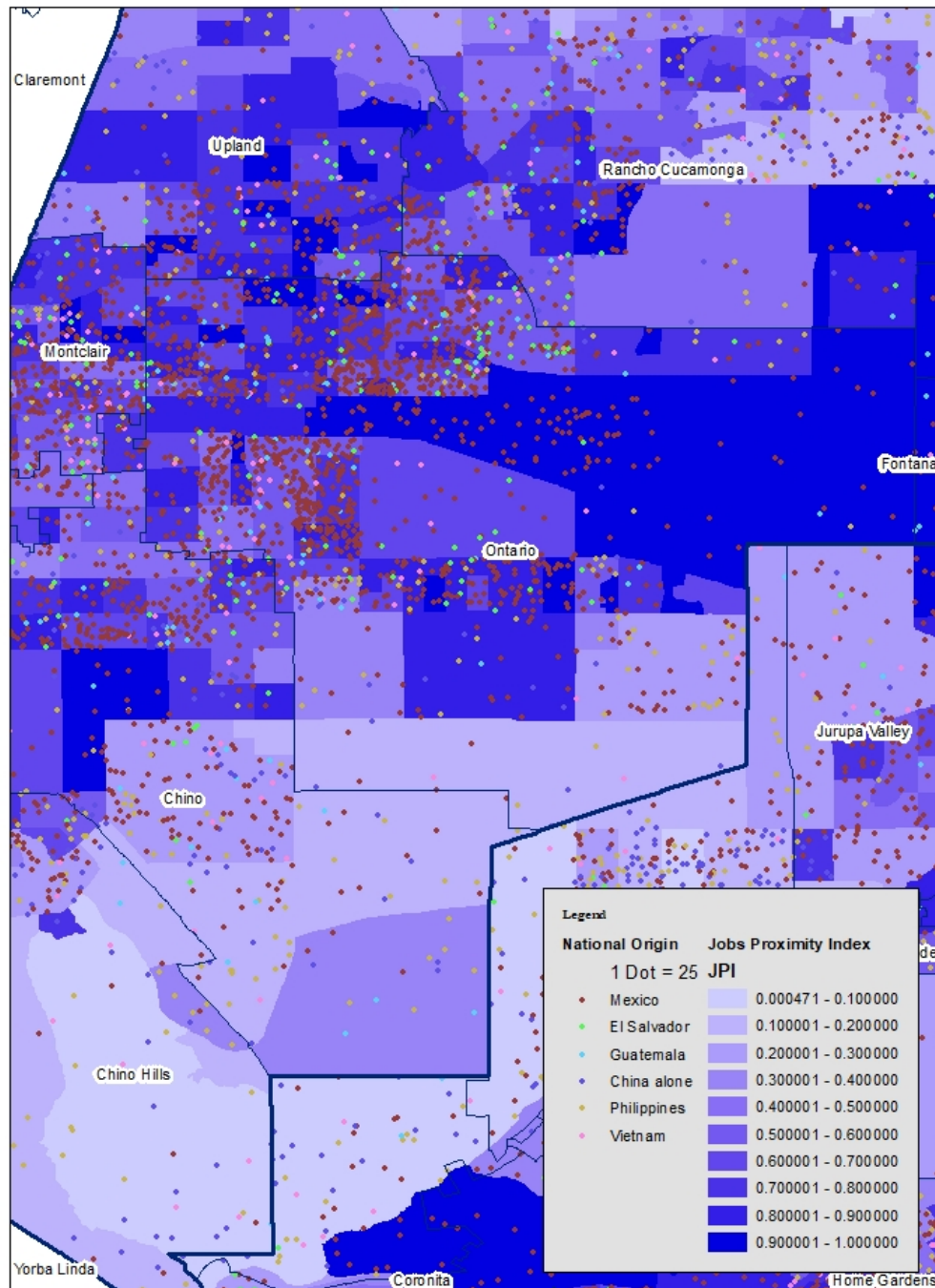
Map 10: Labor Market Engagement Index, region



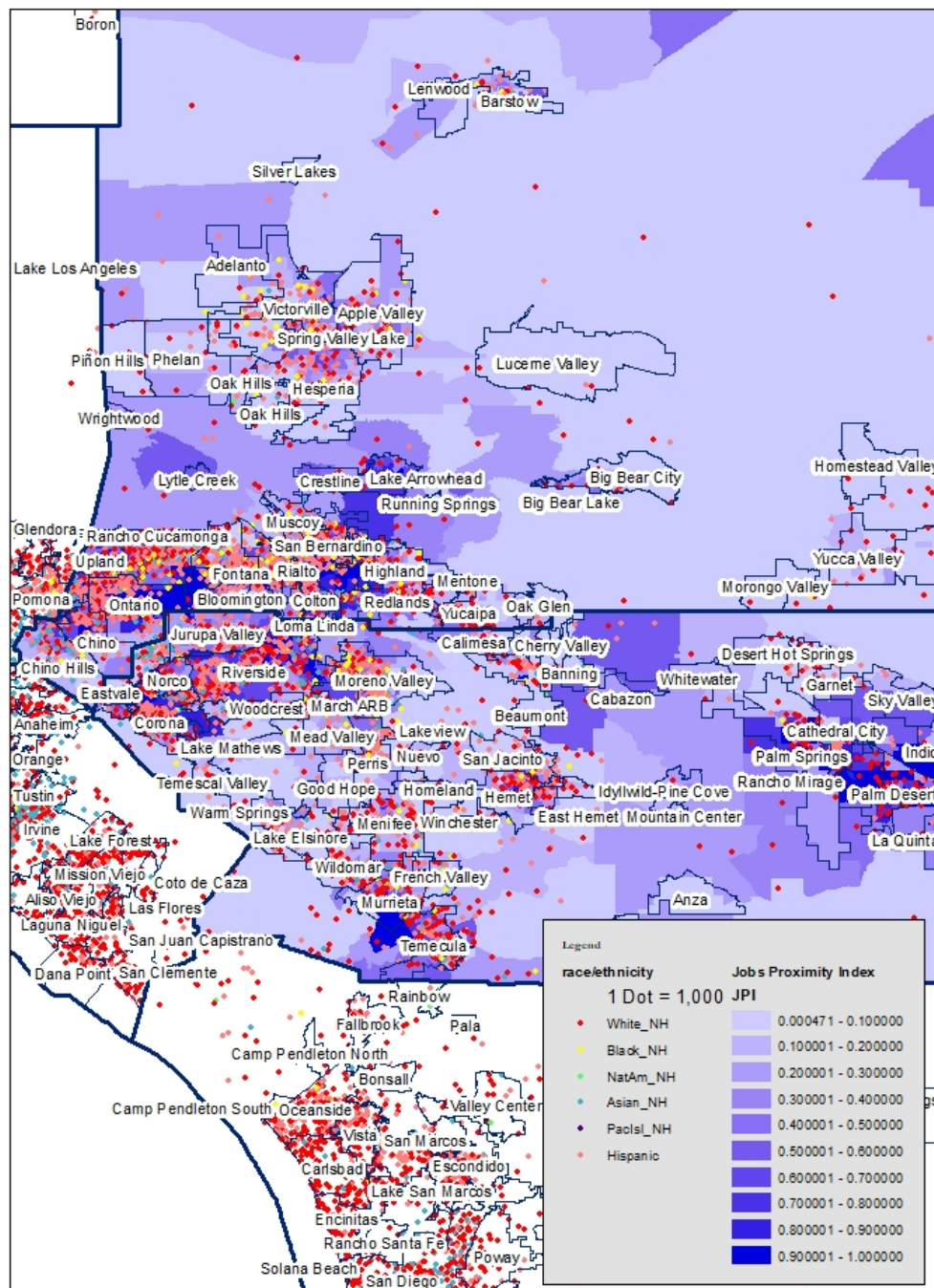
Map 11: Jobs Proximity Index, Ontario, Race



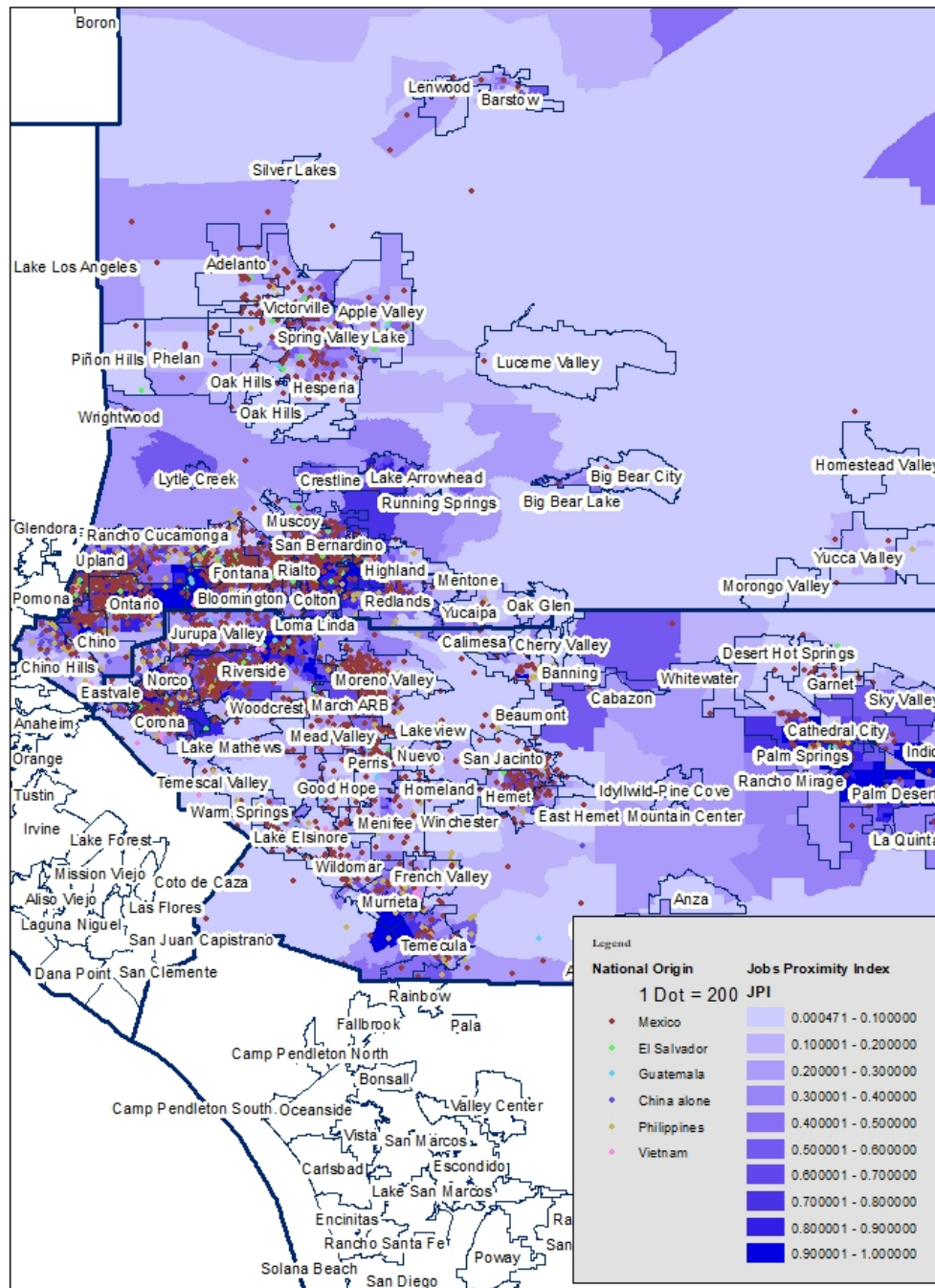
Map 12: Jobs Proximity Index, Ontario, National Origin



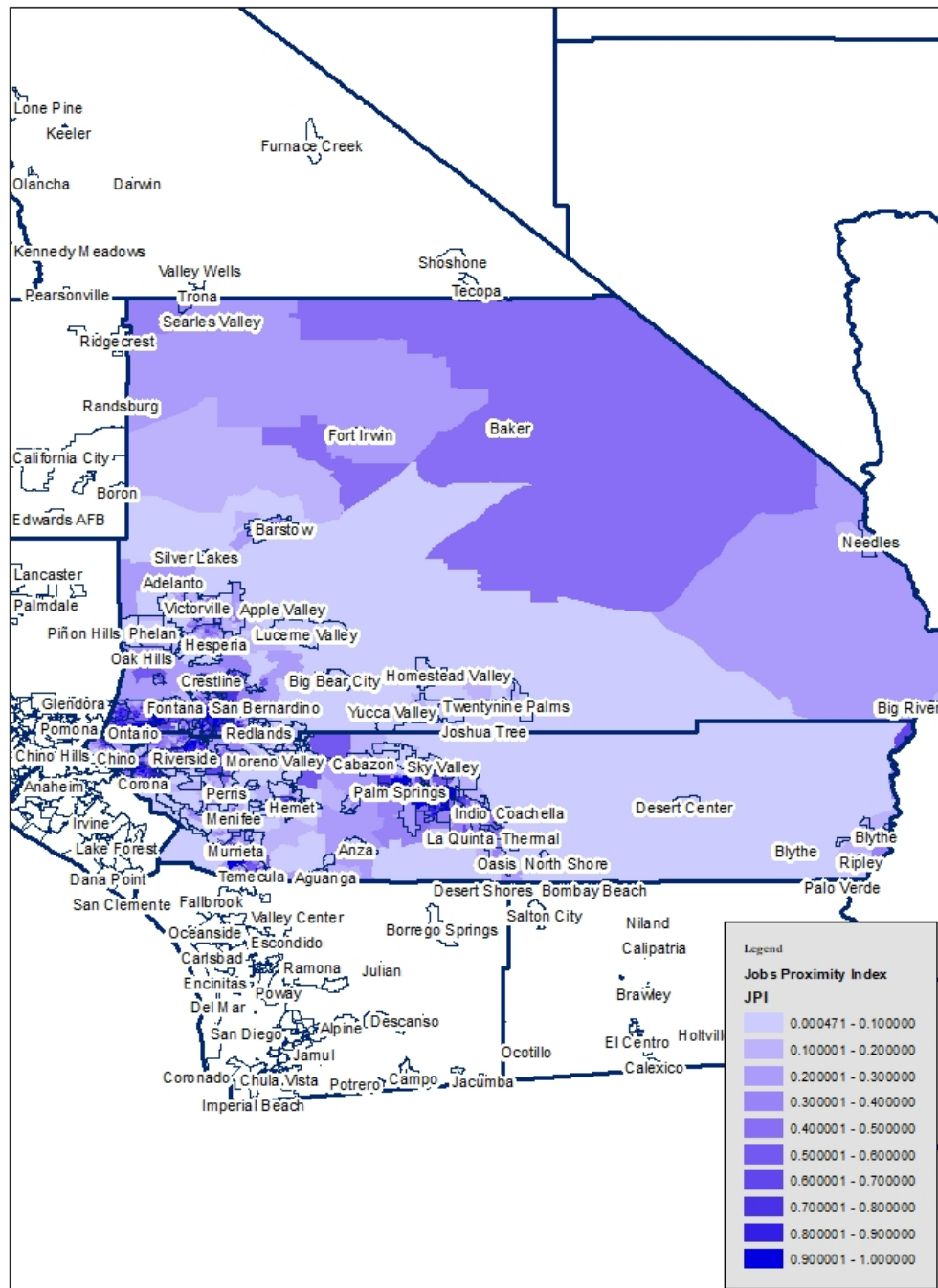
Map 13: Jobs Proximity Index, Southern region, Race



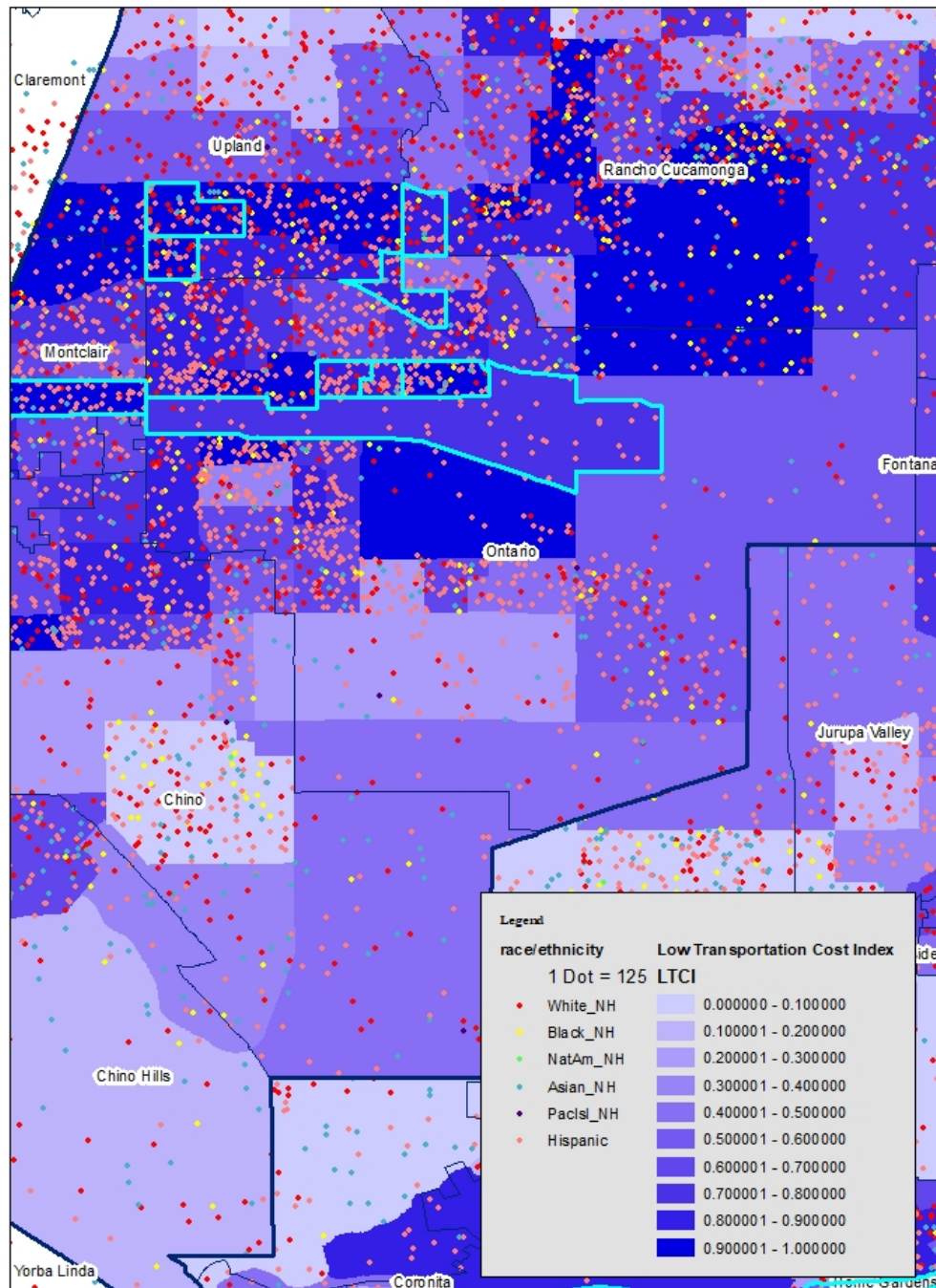
Map 14: Jobs Proximity Index, Southern region, National Origin



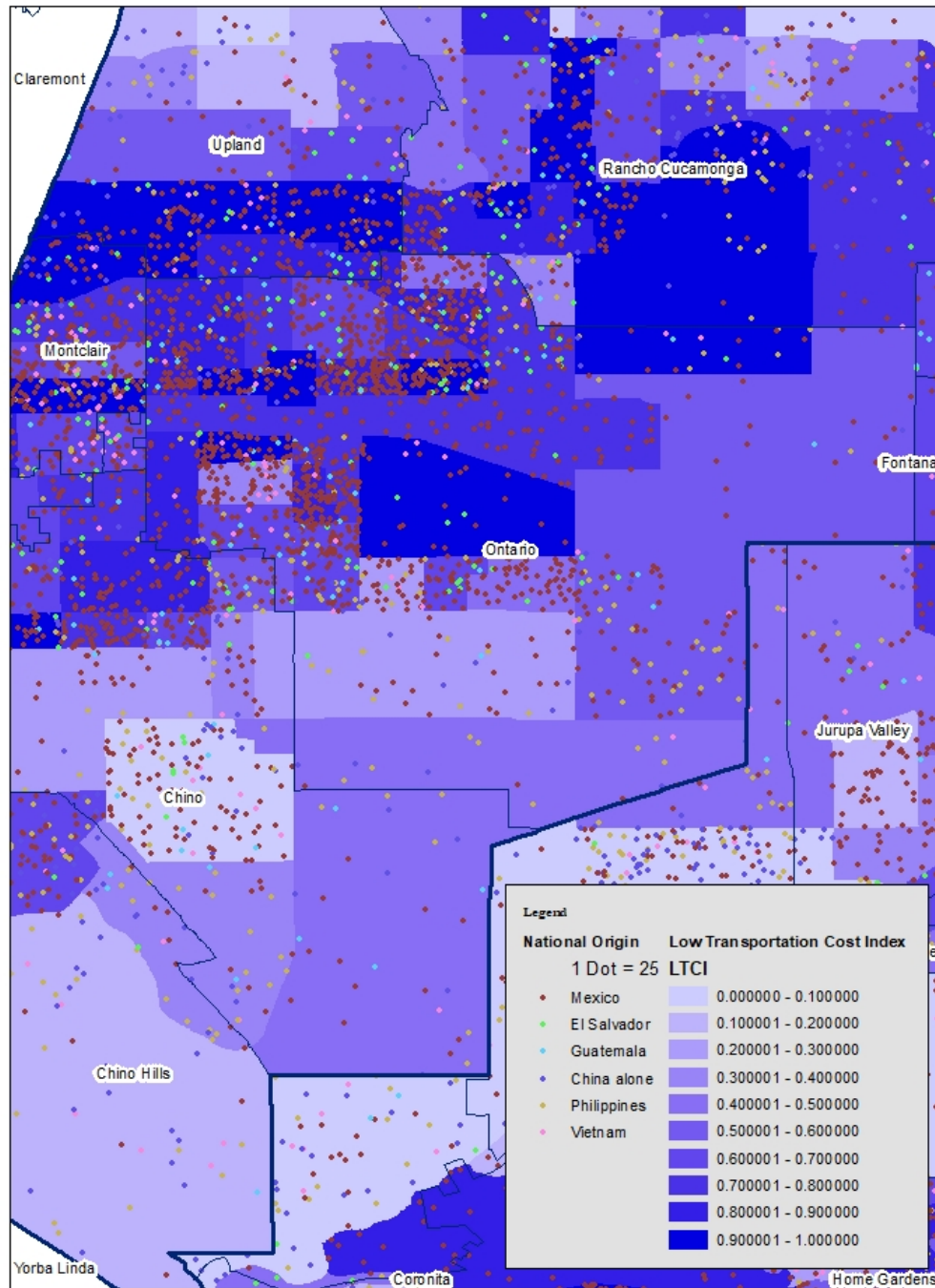
Map 15: Jobs Proximity Index, region



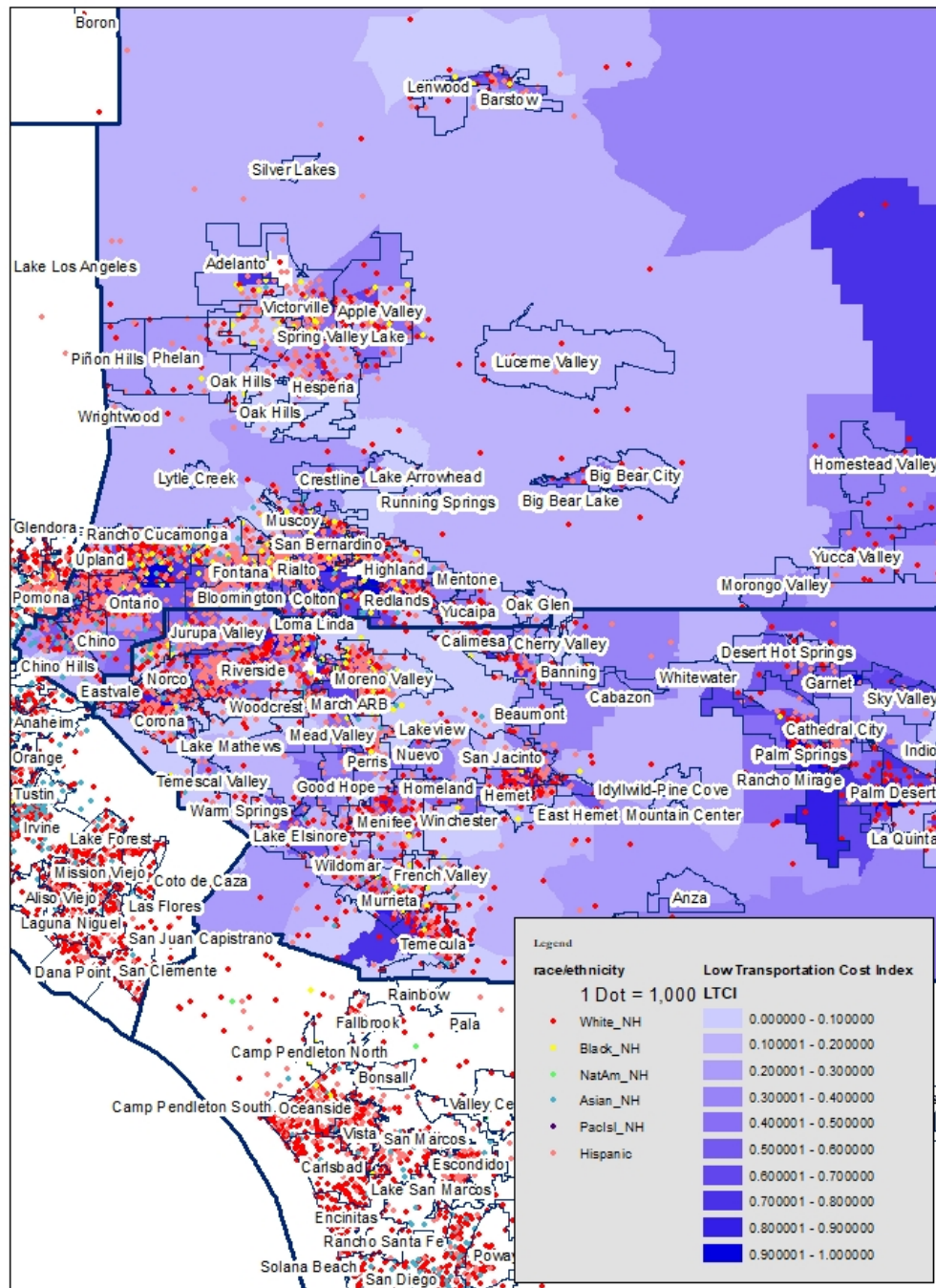
Map 16: Low Transportation Cost Index, Ontario, Race



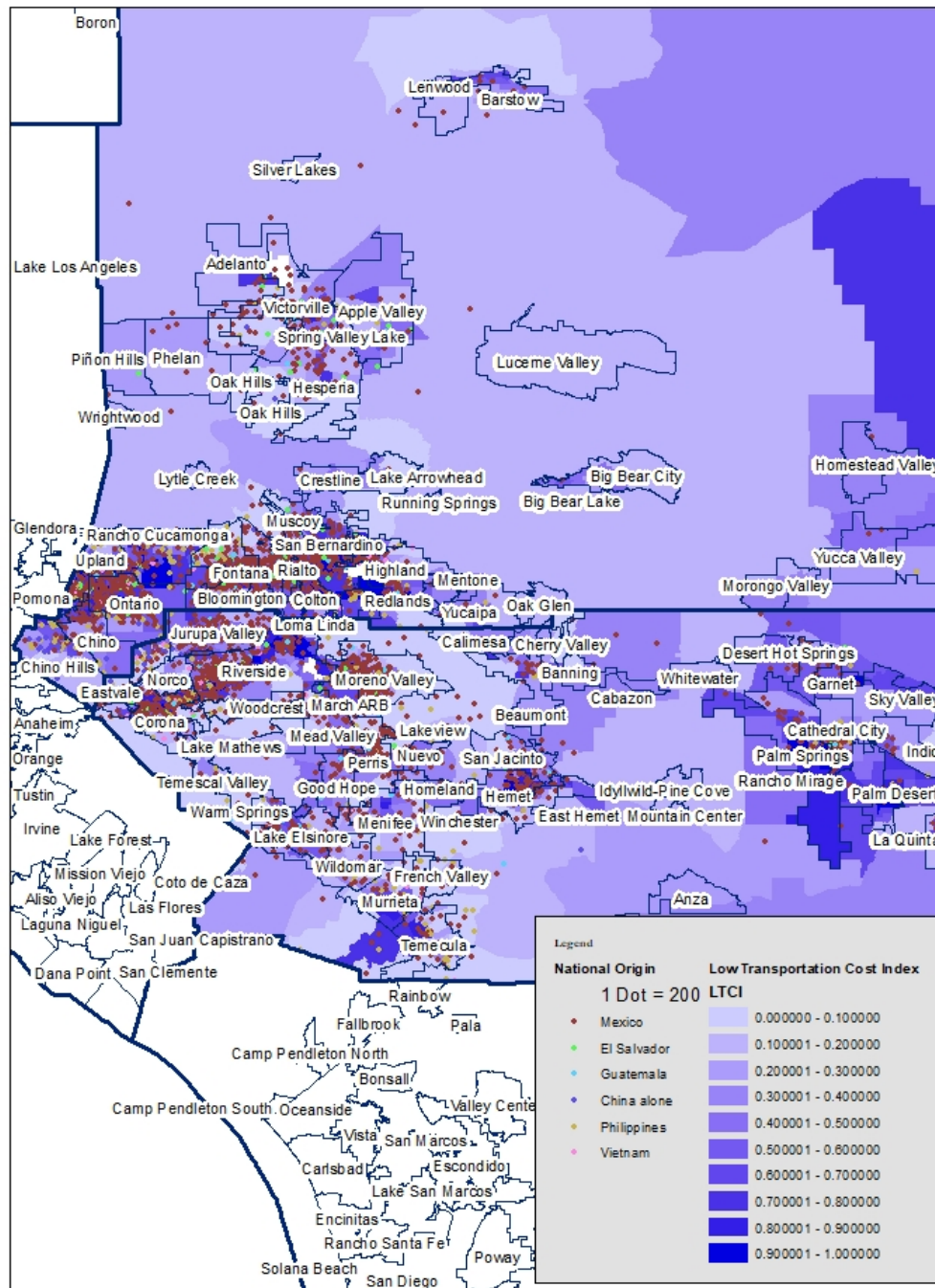
Map 17: Low Transportation Cost Index, Ontario, National Origin



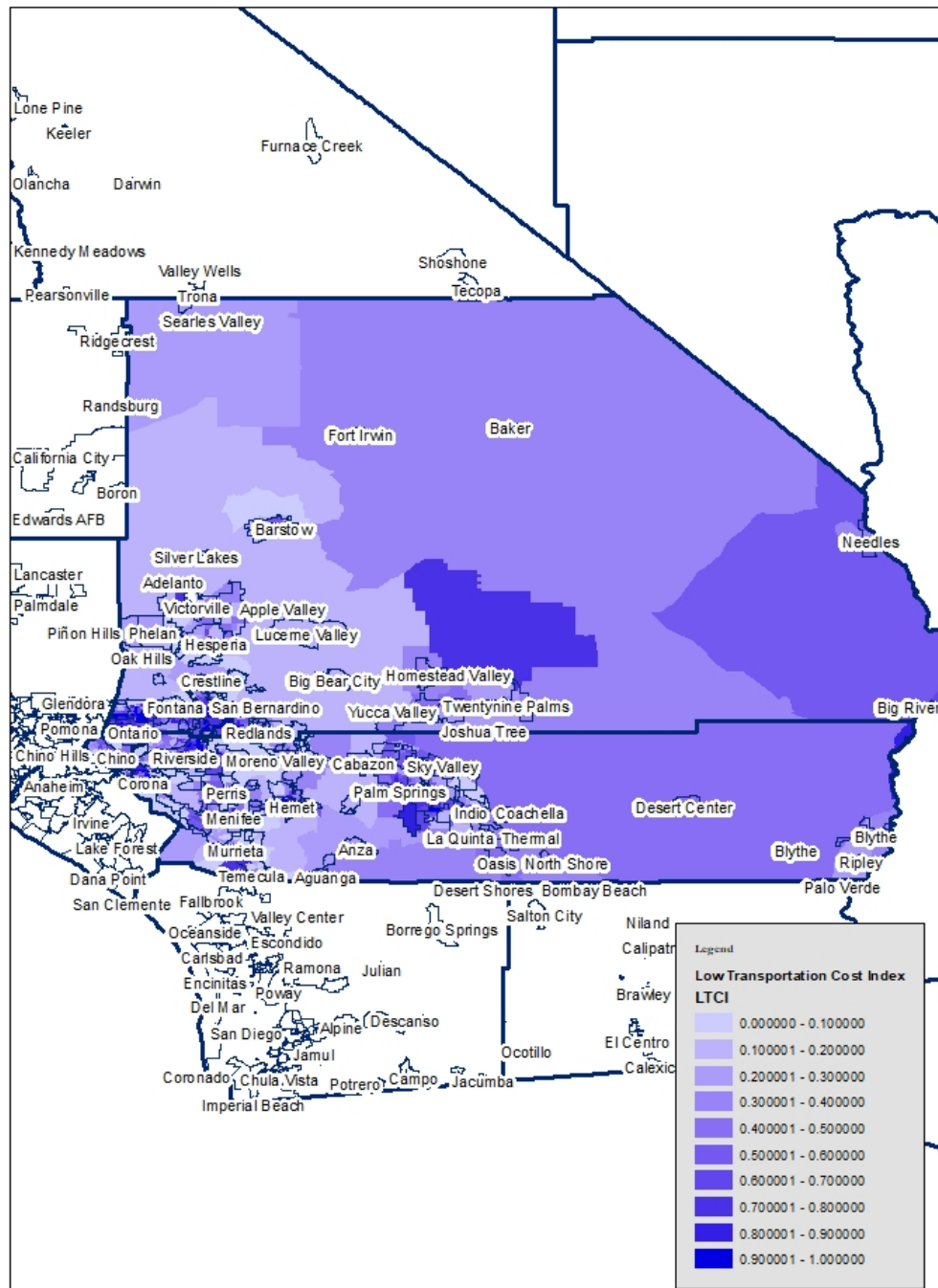
Map 18: Low Transportation Cost Index, Southern region, Race



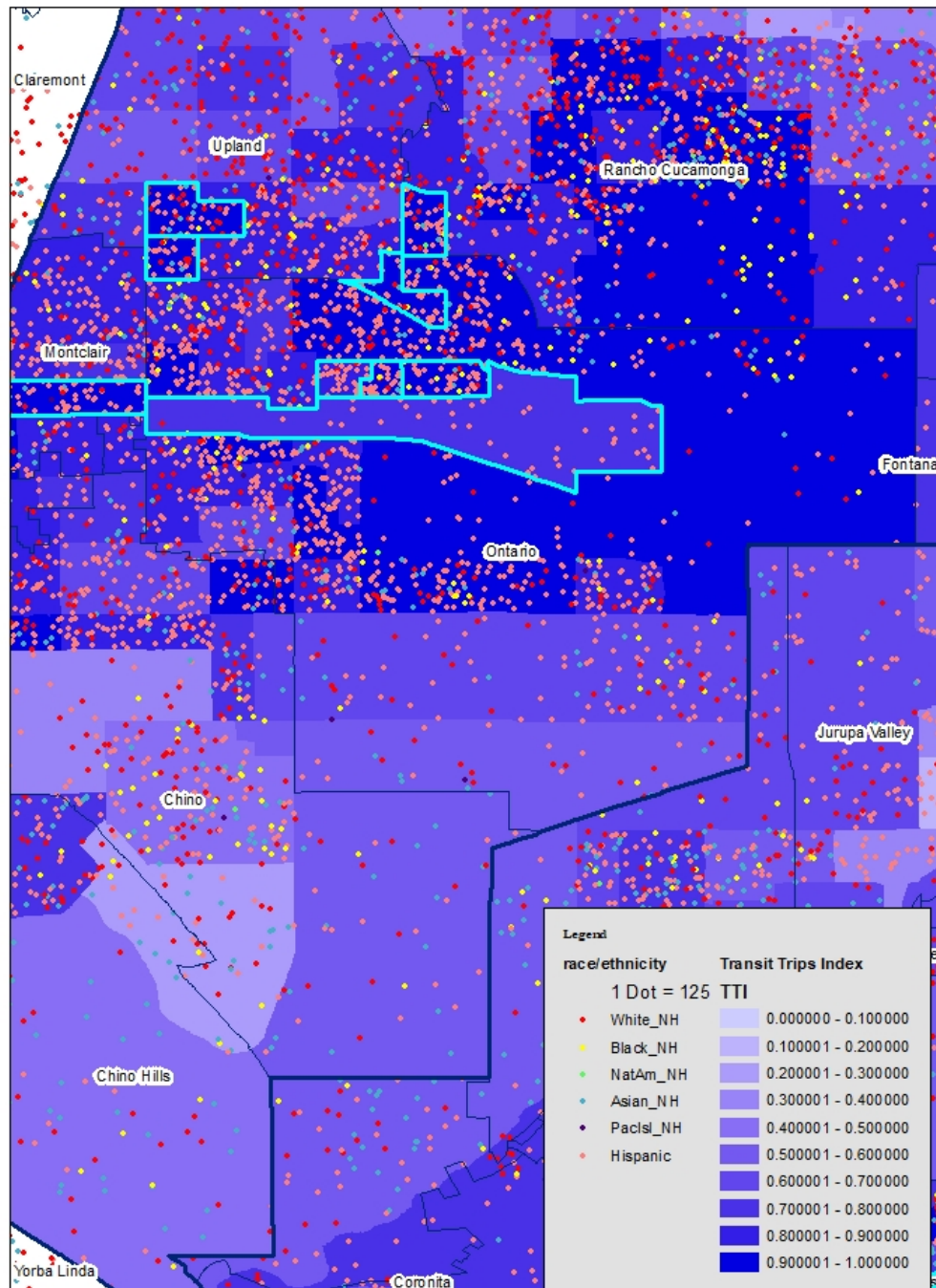
Map 19: Low Transportation Cost Index, Southern region, National Origin



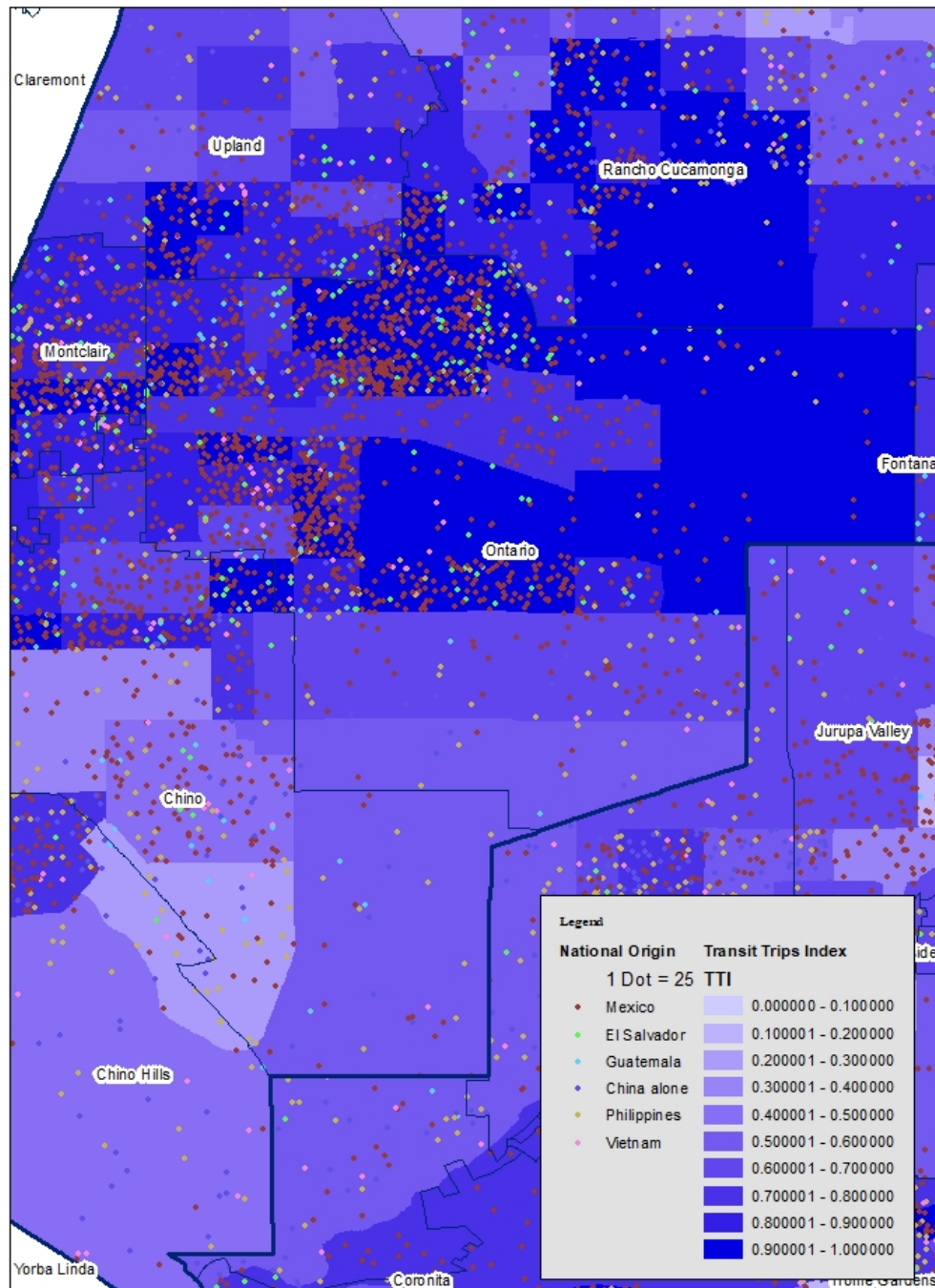
Map 20: Low Transportation Cost Index, region



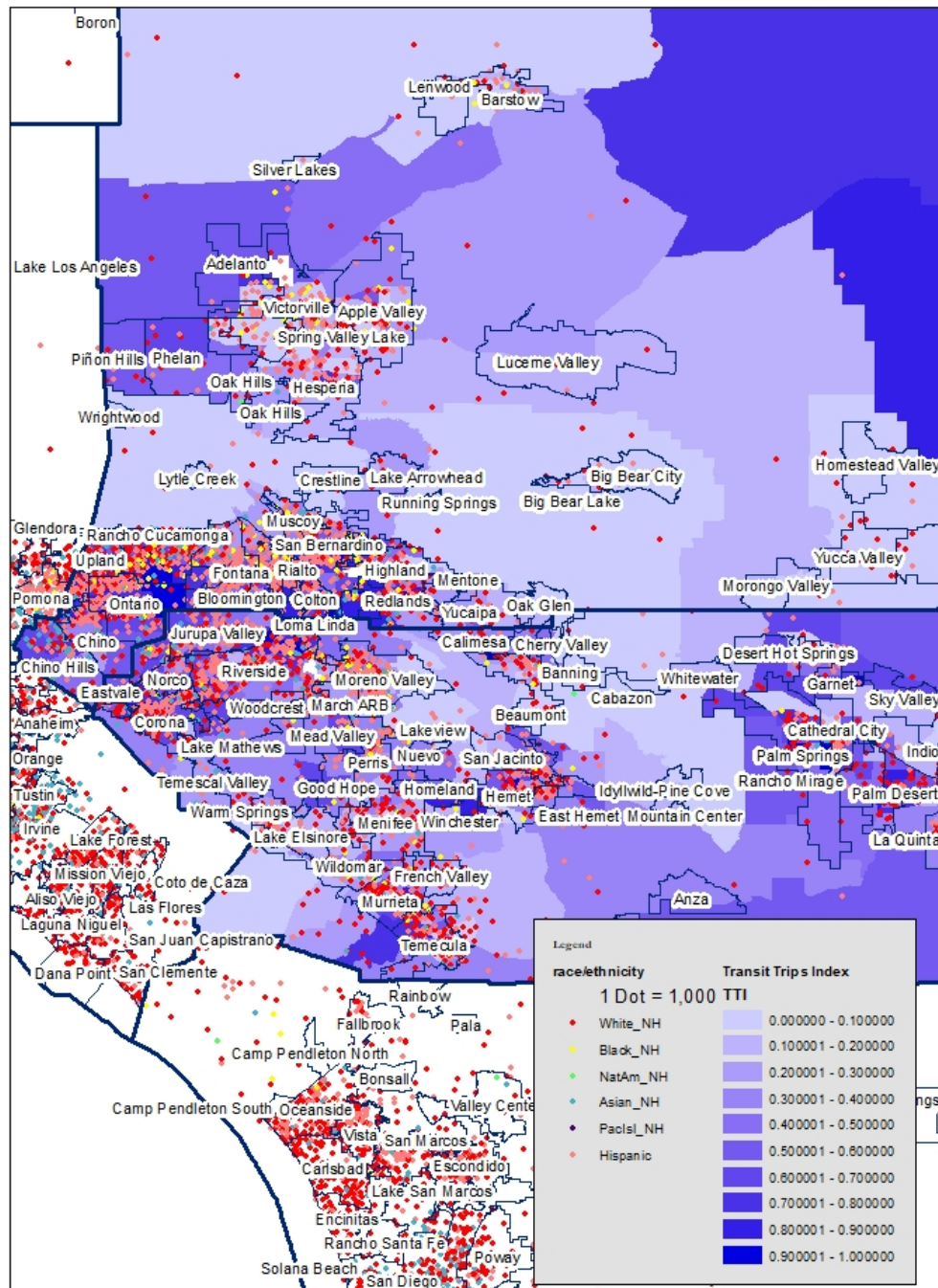
Map 21: Transit Trips Index, Ontario, Race



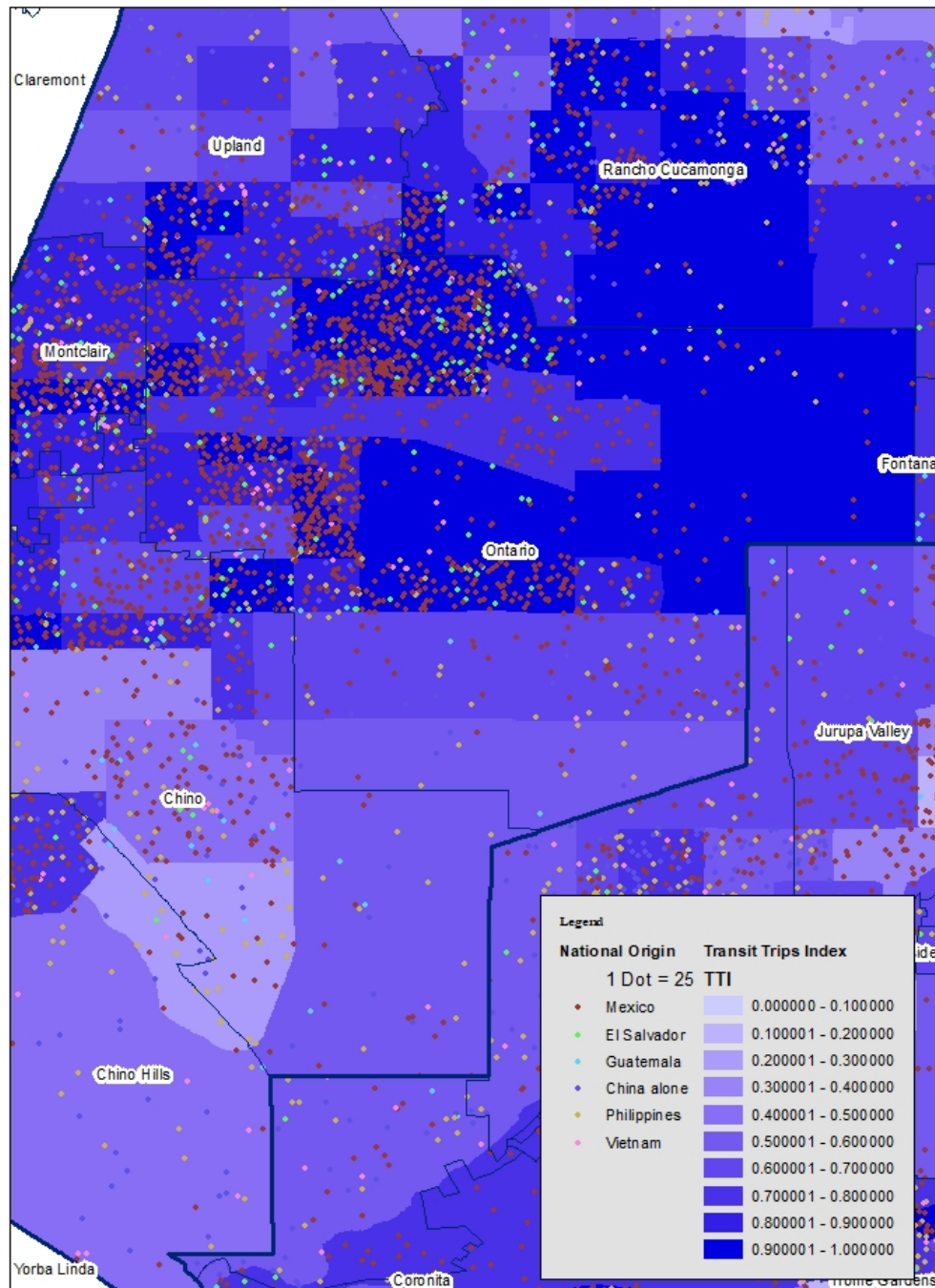
Map 22: Transit Trips Index, Ontario, National Origin



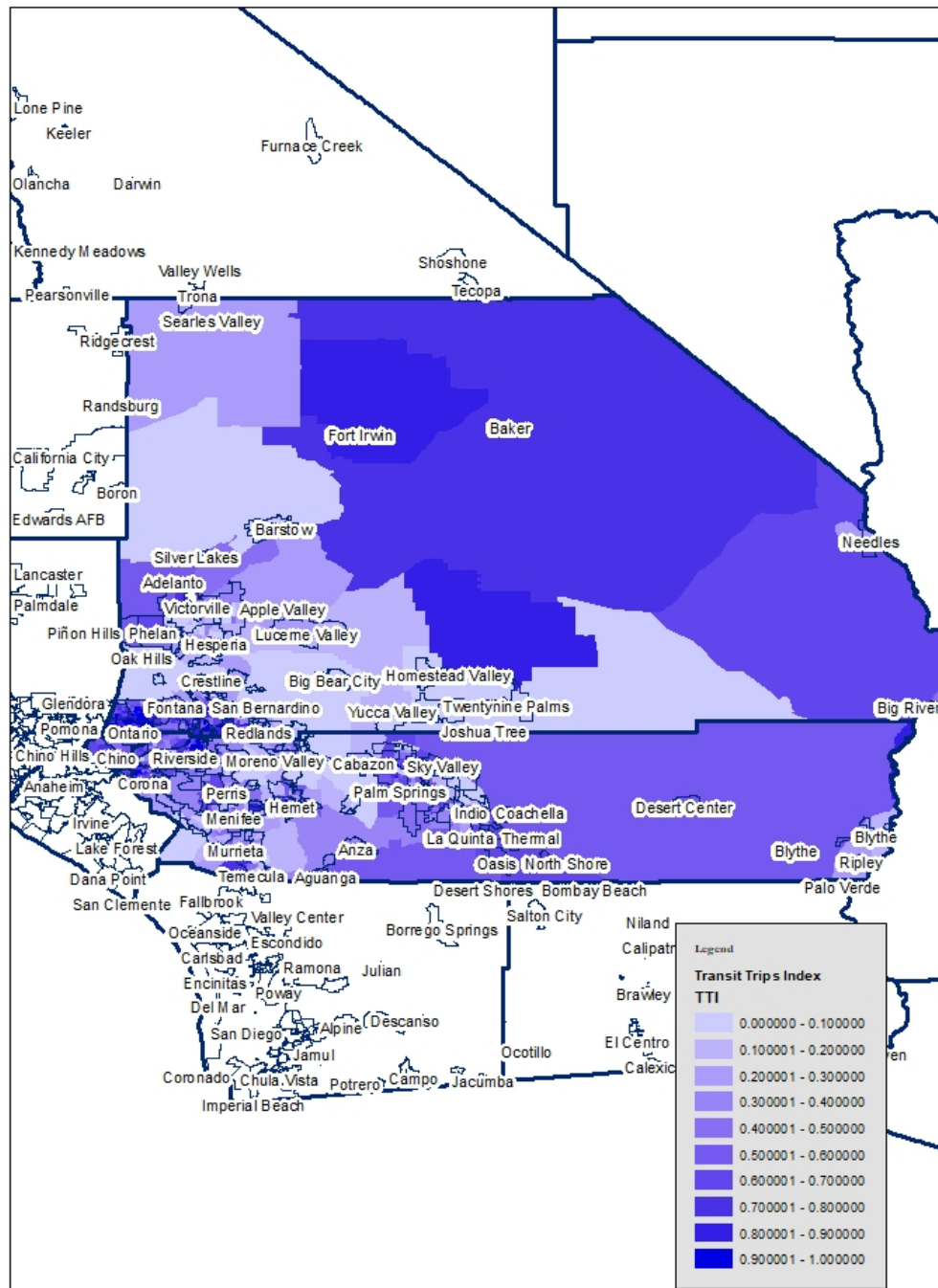
Map 23: Transit Trips Index, Southern region, Race



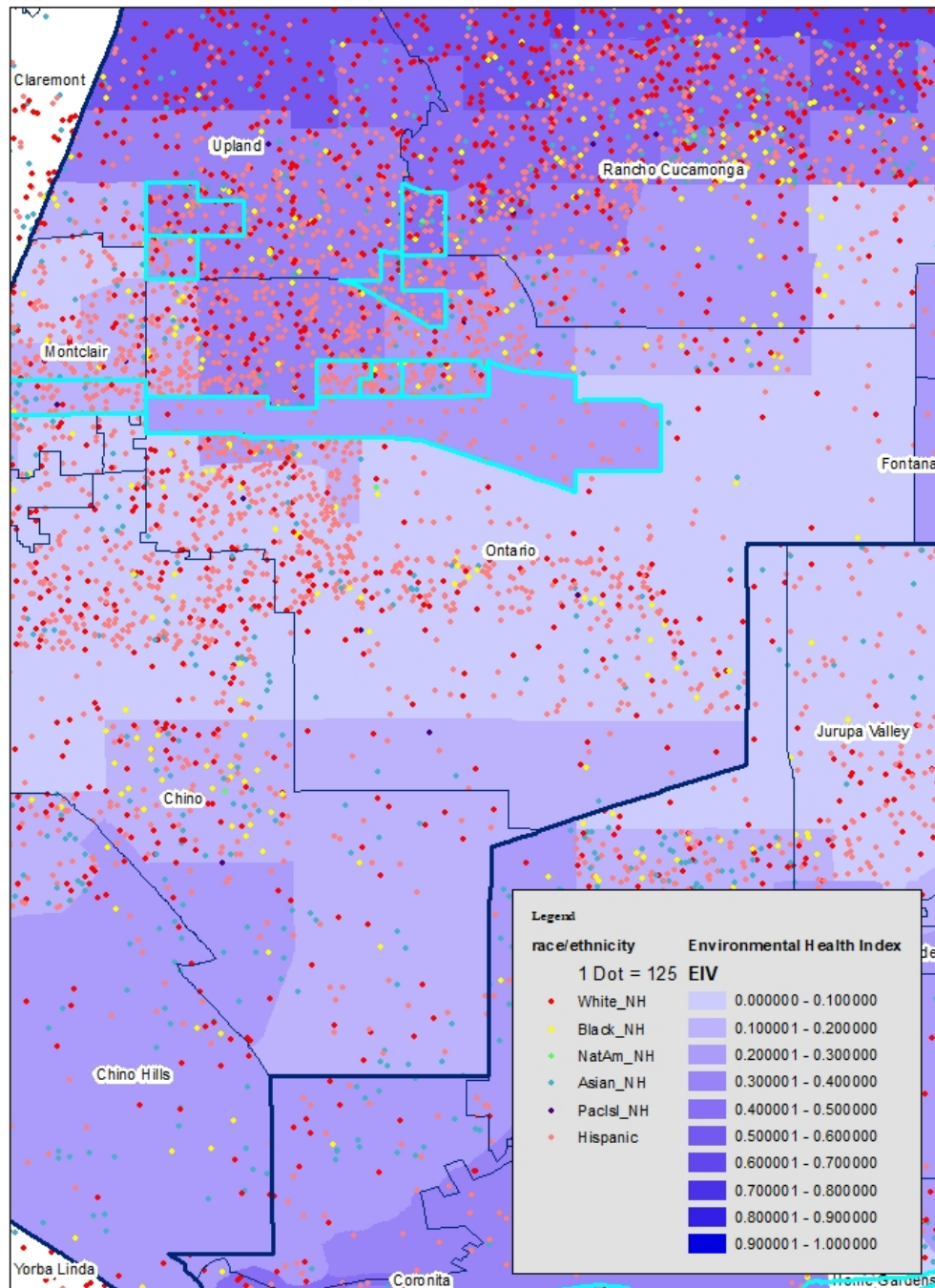
Map 24: Transit Trips Index, Southern region, National Origin



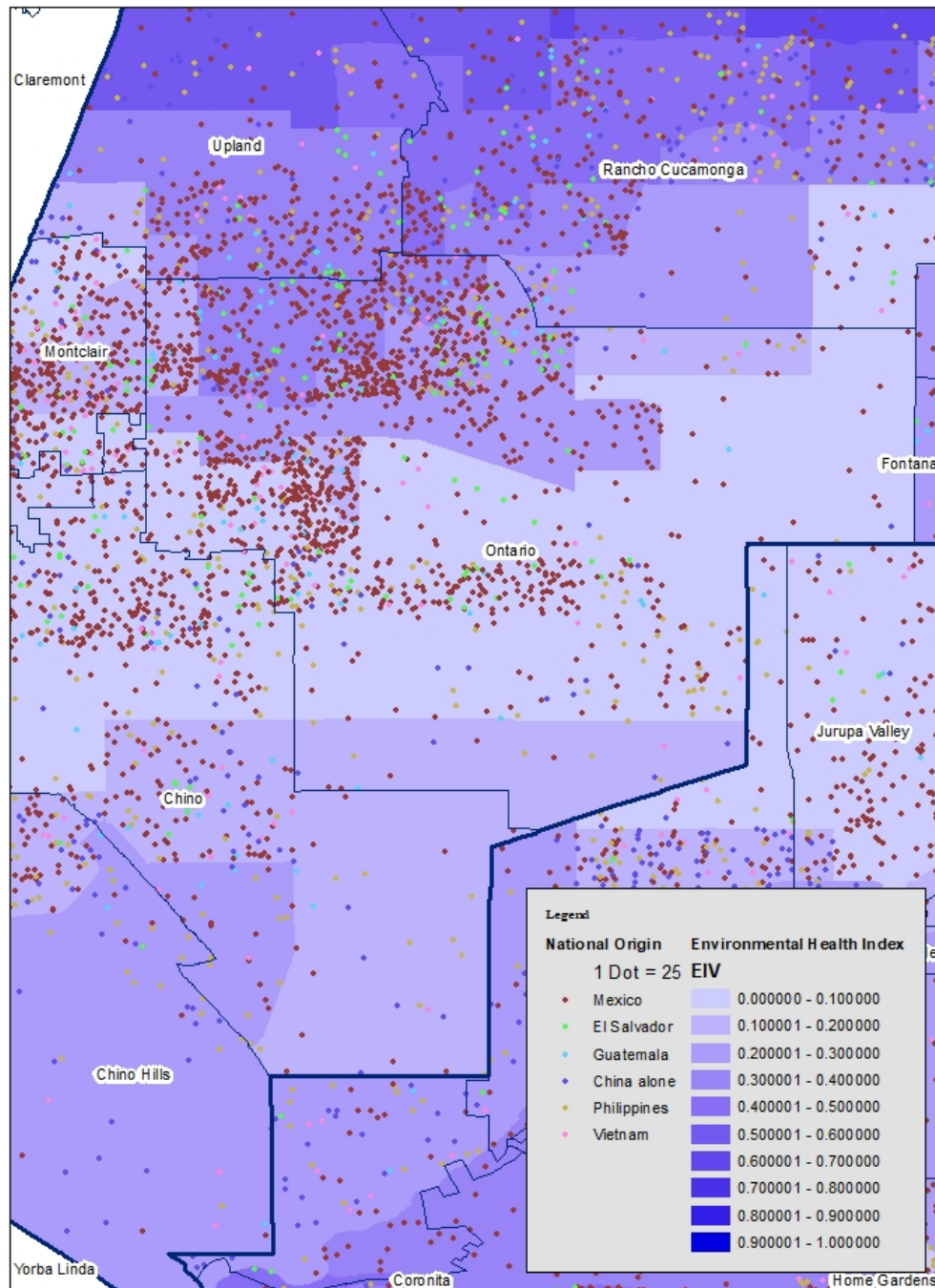
Map 25: Transit Trips Index, region



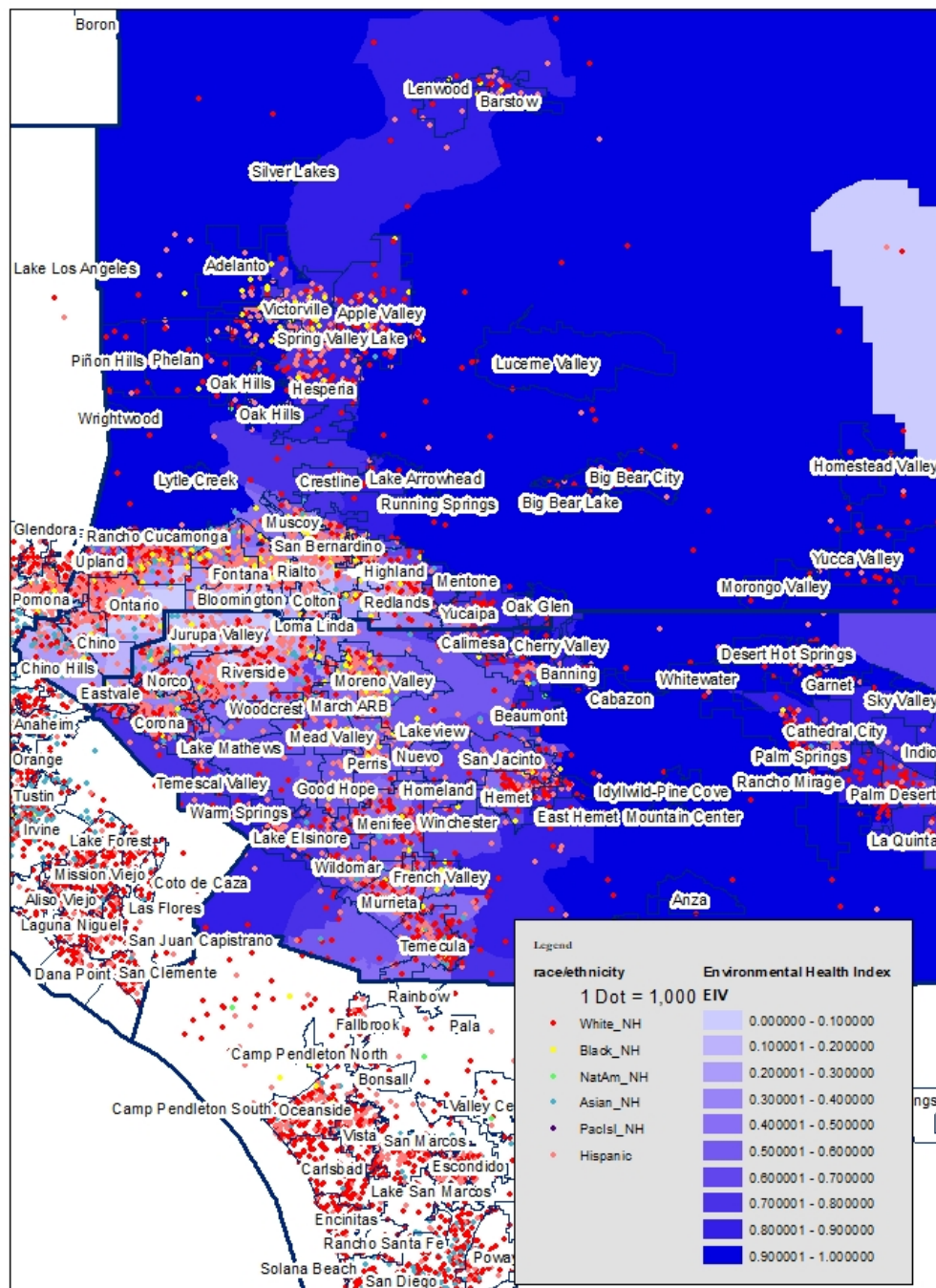
Map 26: Environmental Health Index, Ontario, Race



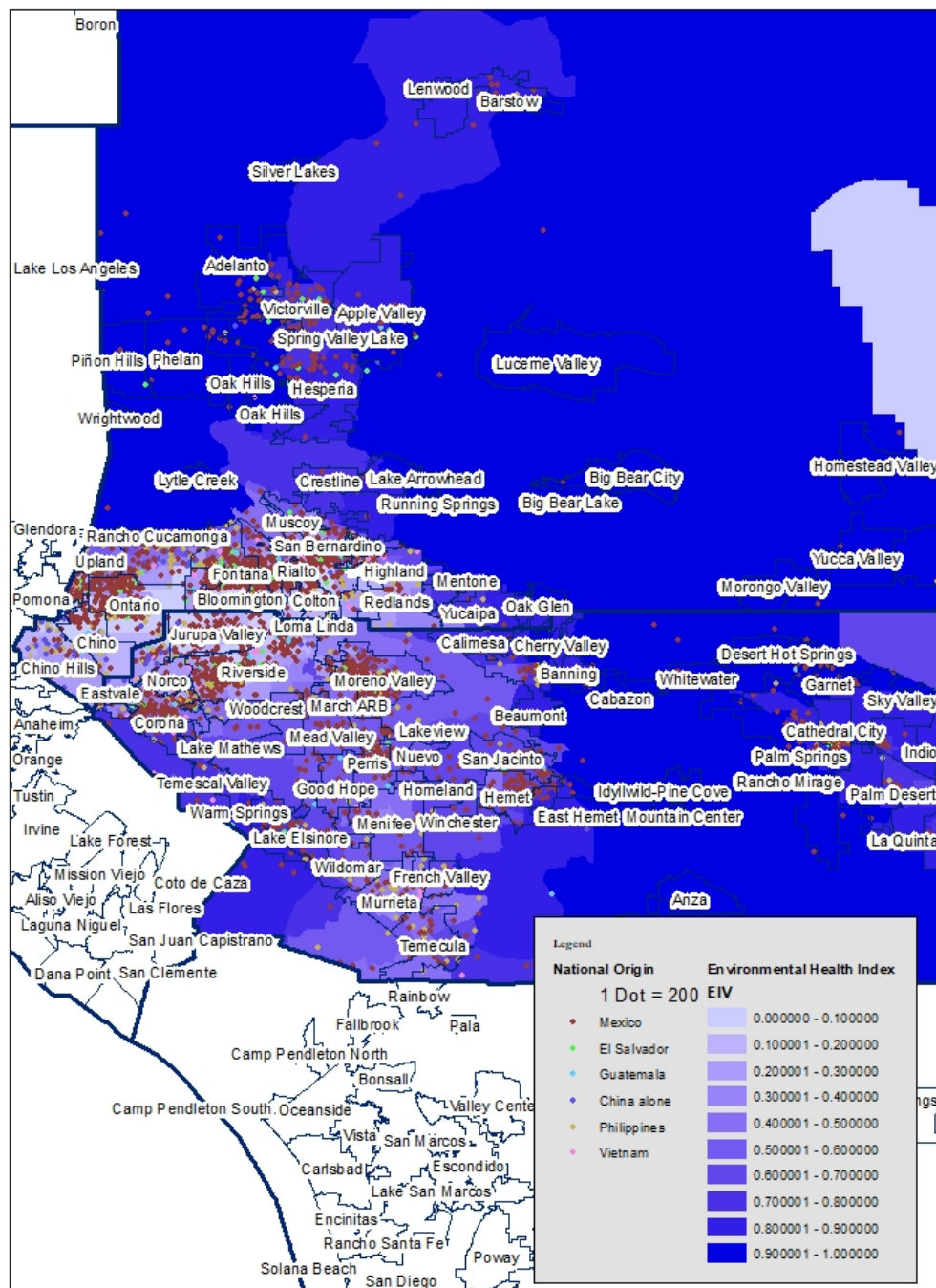
Map 27: Environmental Health Index, Ontario, National Origin



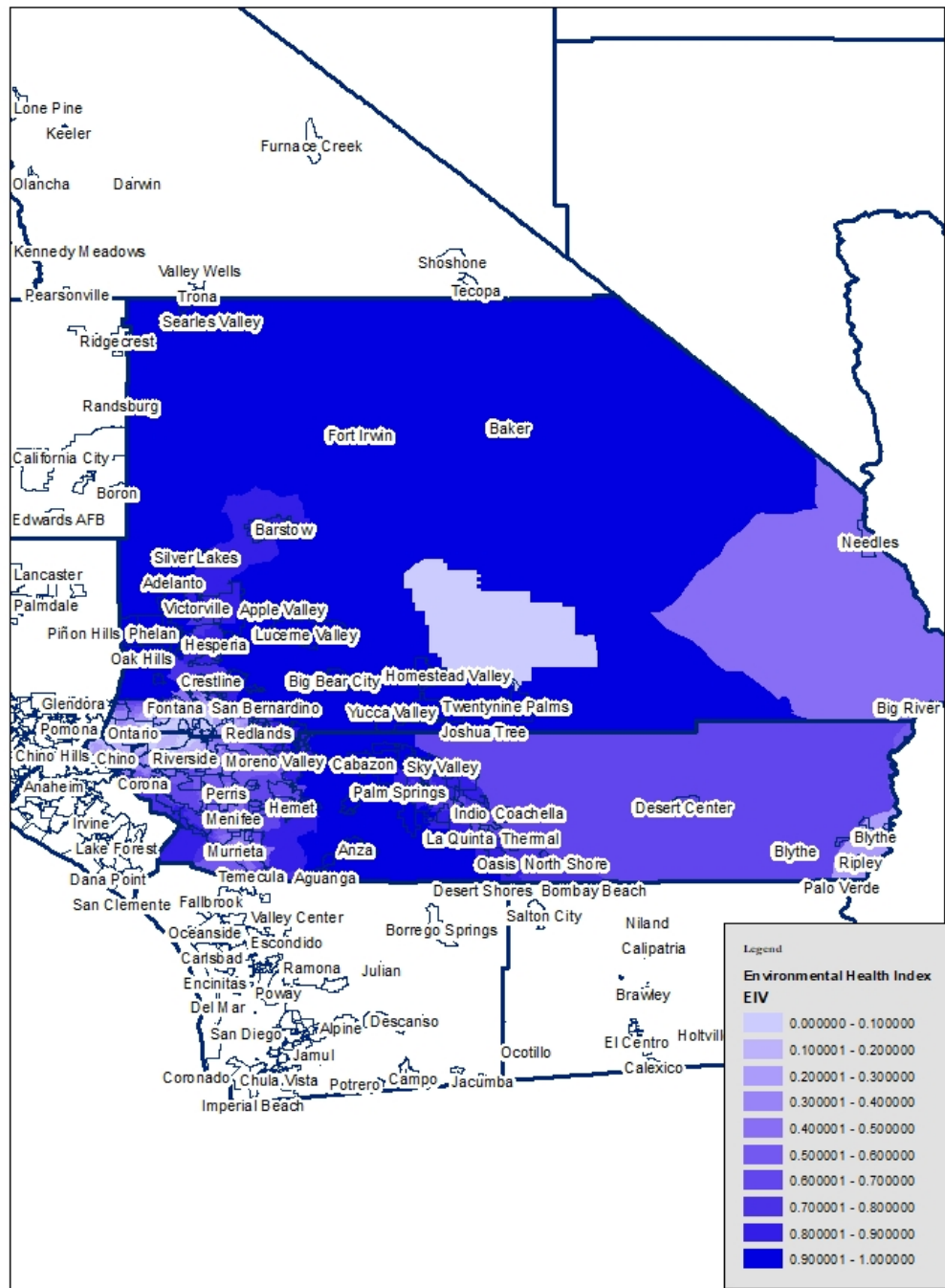
Map 28: Environmental Health Index, Southern region, Race



Map 29: Environmental Health Index, Southern region, National Origin



Map 30: Environmental Health Index, region



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 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.

Please see the Appendix for the following Contributing Factors to Disparities in Access to Opportunity:

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination

iv. Disproportionate Housing Needs

- 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?

Across Ontario and the region, many residents face high rates of housing problems, severe housing problems, and severe housing cost burden. The four HUD-designated housing problems include when a “1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded;³ and 4) household is cost burdened.”⁴ Households are considered to have a housing problem if they experience at least one of the above. This analysis also considers what HUD designates as severe housing problems, which are a lack of kitchen or plumbing, more than one person per room, or cost burden greater than 50%.

Housing Problems

Table 1: Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	Jurisdiction			region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	4,765	11,595	41.10%	213,071	571,507	37.28%
Black, Non-Hispanic	2,260	3,700	61.08%	54,131	97,426	55.56%
Hispanic	16,425	29,285	56.09%	267,034	489,744	54.53%
Asian or Pacific Islander, Non-Hispanic	1,340	2,690	49.81%	35,124	79,782	44.02%
Native American, Non-Hispanic	45	135	33.33%	2,422	4,470	54.18%
Total	26,115	47,405	55.09%	605,466	1,242,929	48.71%
Household Type and Size						
Family households, <5 people	10,990	24,860	44.21%	280,031	703,655	39.80%
Family households, 5+ people	7,615	11,600	65.65%	142,464	240,380	59.27%
Non-family households	6,590	11,670	56.47%	161,093	323,053	49.87%

³ Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms.

⁴ https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html

Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	2,455	11,595	21.17%	106,841	571,507	18.69%
Black, Non-Hispanic	1,355	3,700	36.62%	32,381	97,426	33.24%
Hispanic	10,365	29,285	35.39%	167,801	489,744	34.26%
Asian or Pacific Islander, Non-Hispanic	645	2,690	23.98%	19,258	79,782	24.14%
Native American, Non-Hispanic	10	135	7.41%	1,468	4,470	32.84%
Total	14,830	47,405	31.28%	327,749	1,242,929	26.37%
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: Data Sources: CHAS						

Housing problems and severe housing problems are endemic issues across all races/ethnicities in Ontario, though some groups do face their effects in disproportionate ways. Ontario and the region have high rates of housing problems; the percentage of households experiencing at least one housing problem is 55.09% in Ontario and 48.71% across the region. The city as a whole faces higher rates of housing problems than does the region across all races/ethnicities except Native American (figures for Native Americans should be taken with a grain of salt due to their low population in the jurisdiction). Black and Hispanic households in particular face especially high rates of housing problems at 61.08% and 56.09% respectively. Housing problems are exacerbated for large families living in a single household at 65.65%, while non-family households have the lowest rate of housing problems at 44.21%.

In the region, 48.71% of households face at least 1 of 4 housing problems. White and Asian or Pacific Islander households have slightly lower rates of housing problems, at 37.28% and 44.02% respectively, while Black households have the highest rate of 55.56%. Hispanic households have the second highest rate at 54.53% countywide. Native American households have a rate similar to Hispanic ratings at 54.18% but the low populations of Native American households across jurisdictions may lead to misleading data (which is why they are not as frequently discussed here). Housing problems are found in differing rates across family types; the highest at 59.27% is for families of five or more and the lowest is 39.80% families of four or fewer.

Ontario also has higher rates than the region in the severe housing problems category. 31.28% of households have four or more severe housing problems compared to 26.37. Similarly, Black and Hispanic households experience severe housing problems at a rate of 36.62% and 35.39% respectively. In the region, Hispanic and Black households are most likely are more likely to have severe housing problems (34.26 and 33.24% respectively).

Table 2: Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	Jurisdiction			region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	2,040	11,595	17.59%	94,046	571,507	16.46%
Black, Non-Hispanic	1,165	3,700	31.49%	28,080	97,426	28.82%
Hispanic	6,670	29,285	22.78%	106,603	489,744	21.77%
Asian or Pacific Islander, Non-Hispanic	395	2,690	14.68%	14,695	79,782	18.42%
Native American, Non-Hispanic	10	135	7.41%	1,251	4,470	27.99%
Total	10,280	47,405	21.69%	244,675	1,242,929	19.69%
Household Type and Size						
Family households, <5 people	4,695	24,860	18.89%	125,801	703,655	17.88%
Family households, 5+ people	1,970	11,600	16.98%	37,697	240,380	15.68%
Non-family households	3,760	11,670	32.22%	86,458	323,053	26.76%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						

Similar to the housing problems illustrated in the first table, Black and Hispanic households are more likely to have severe cost burdens, paying 50% or more of their income towards housing costs. In Ontario, 31.49% of Black households experience severe cost burdens as do 22.78% of Hispanic households. Non-family households are also more likely to face severe housing cost burdens (32.22%) compared to families with five or more people (16.98%).

In the region, 19.69% of households are severely cost burdened. The problem is more acute among Black households (28.82%) and Hispanic households (21.77%); Native American households have a rate of 27.99 but the sample size is significantly smaller. Like in Ontario, non-family households have the highest rate of severe cost burden at 26.76%. and large families have the lowest rate at 15.68%

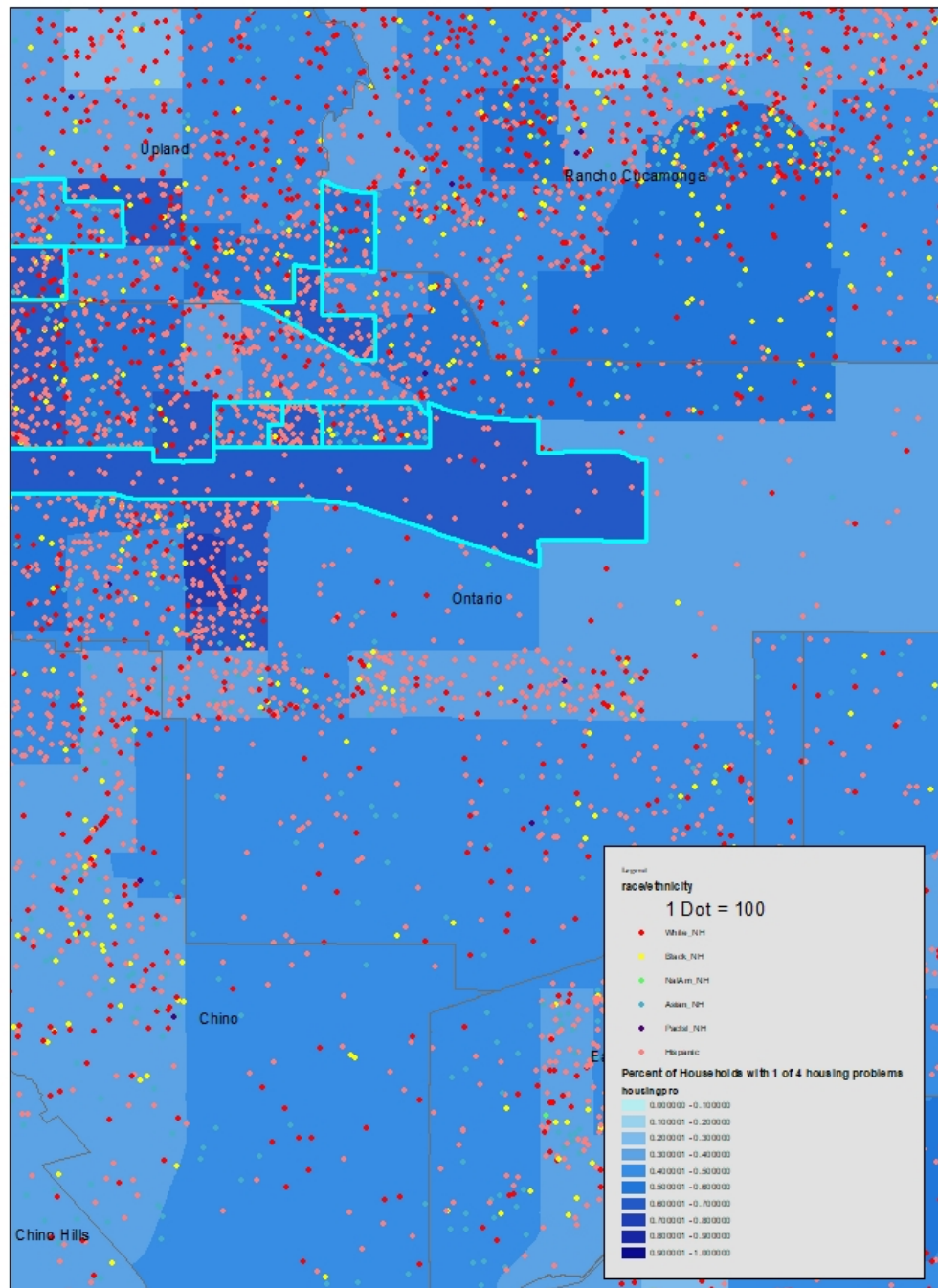
**Table 3: Percentage of Overcrowded Households by Race or Ethnicity, 2013-2017
American Community Survey**

	Non-Hispanic White Households	Black Households	Native American Households	Asian American or Pacific Islander Households	Hispanic Households
Ontario	3.08%	4.58%	8.44%	10.99%	15.86%
Region	1.95%	5.32%	9.66%	6.18%	15.50%

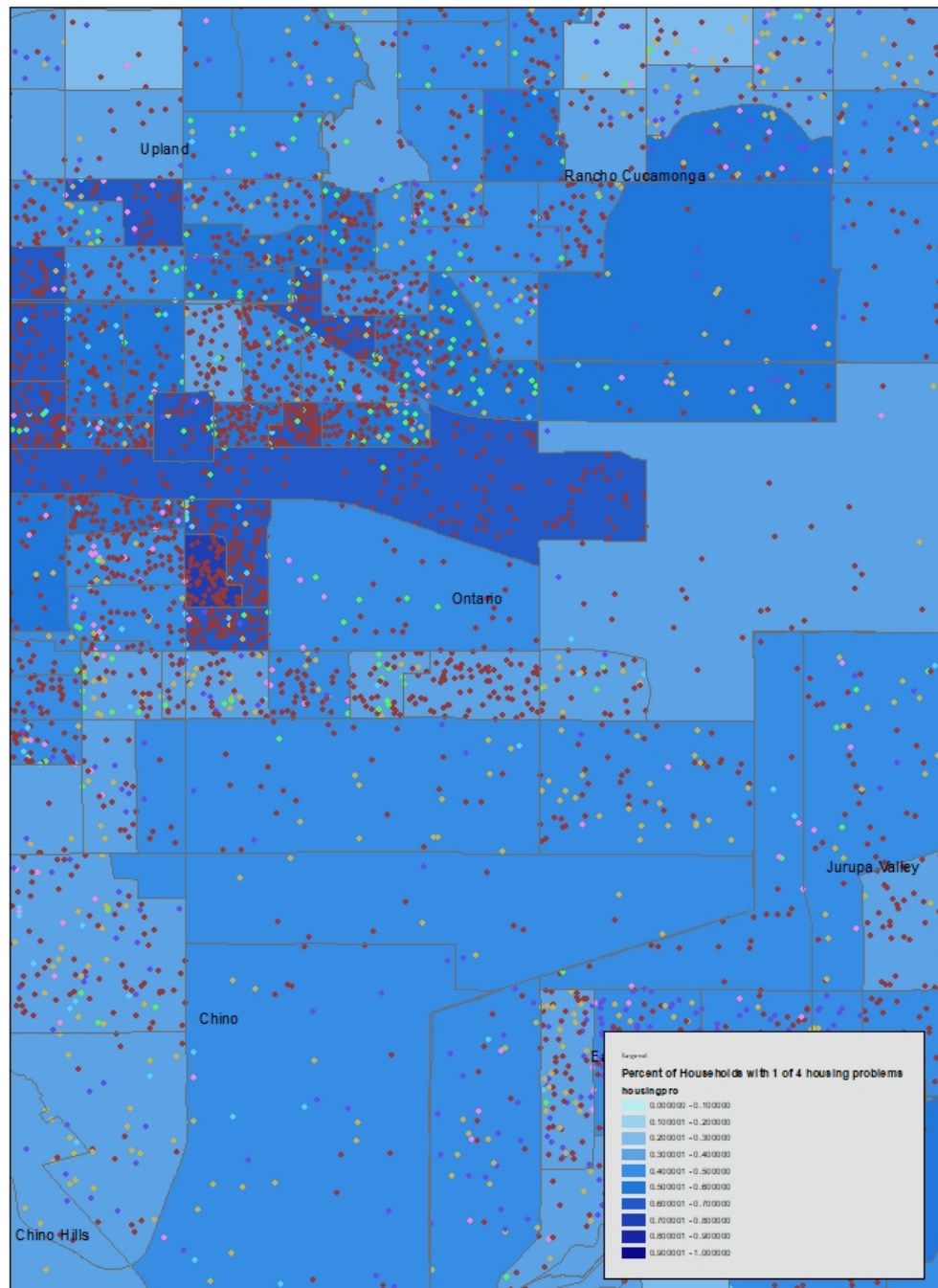
The tables above indicate overcrowding Ontario and the region. Hispanic households experience overcrowding at the highest rate of 15.86% in Ontario and 15.50% in the region. Asian Americans have the second highest rate of 10.99% in Ontario and 6.18% in the region (not including data for Native American households because of the small sample size).

- 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?*

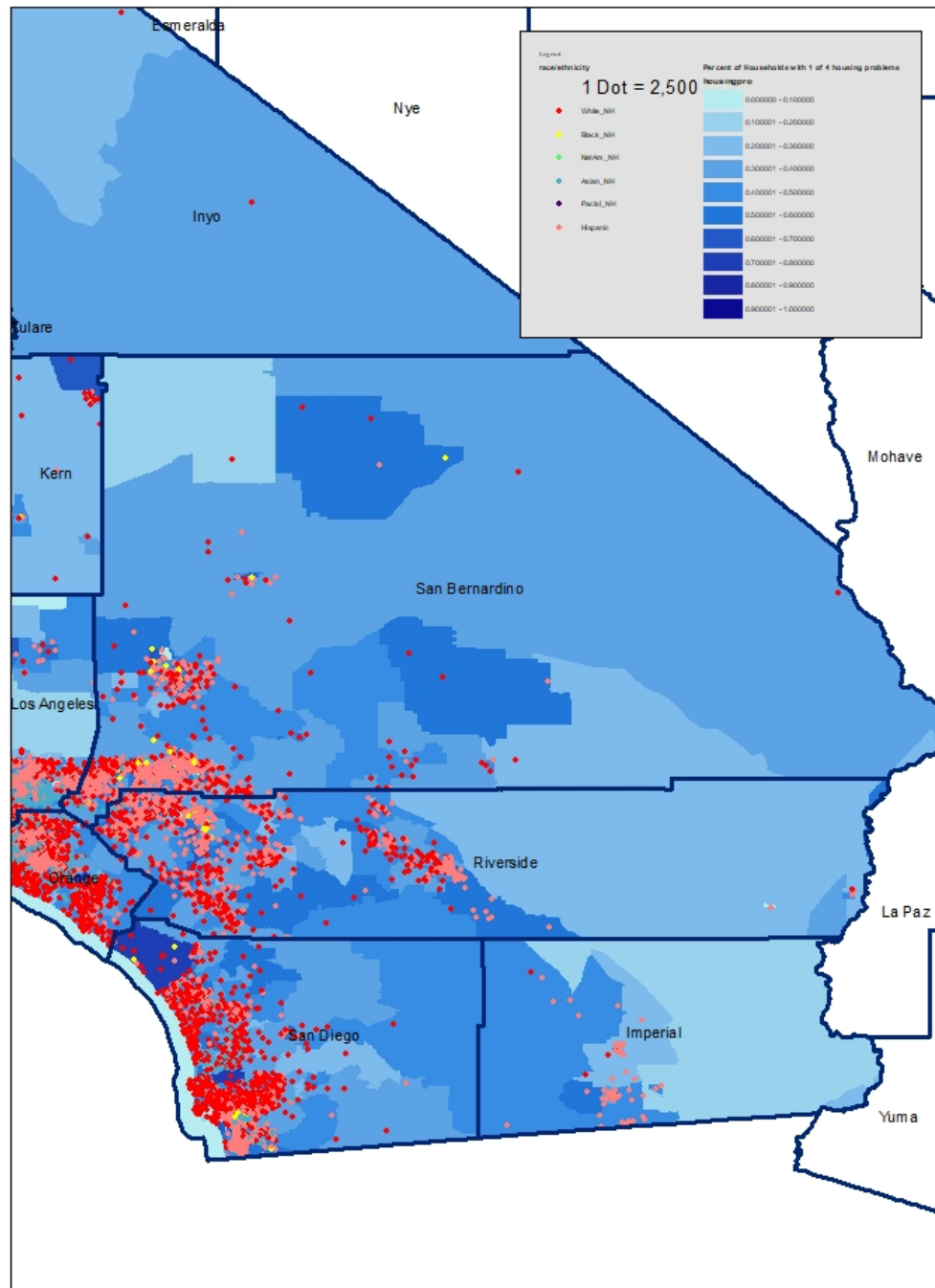
Map 1: Households with Disproportionate Housing Needs by Race/Ethnicity, Ontario



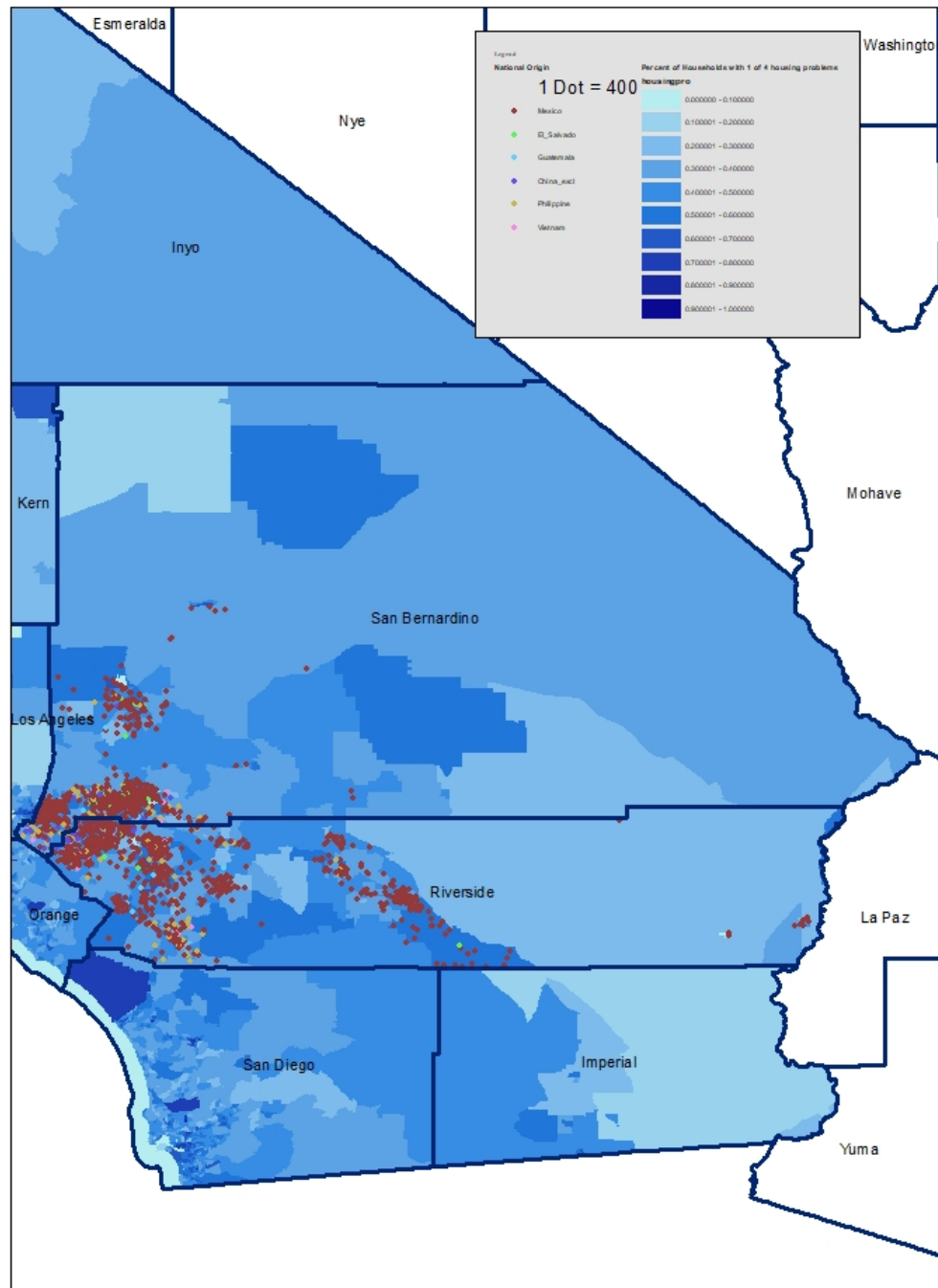
Map 2: Households with Disproportionate Housing Needs by National Origin, Ontario



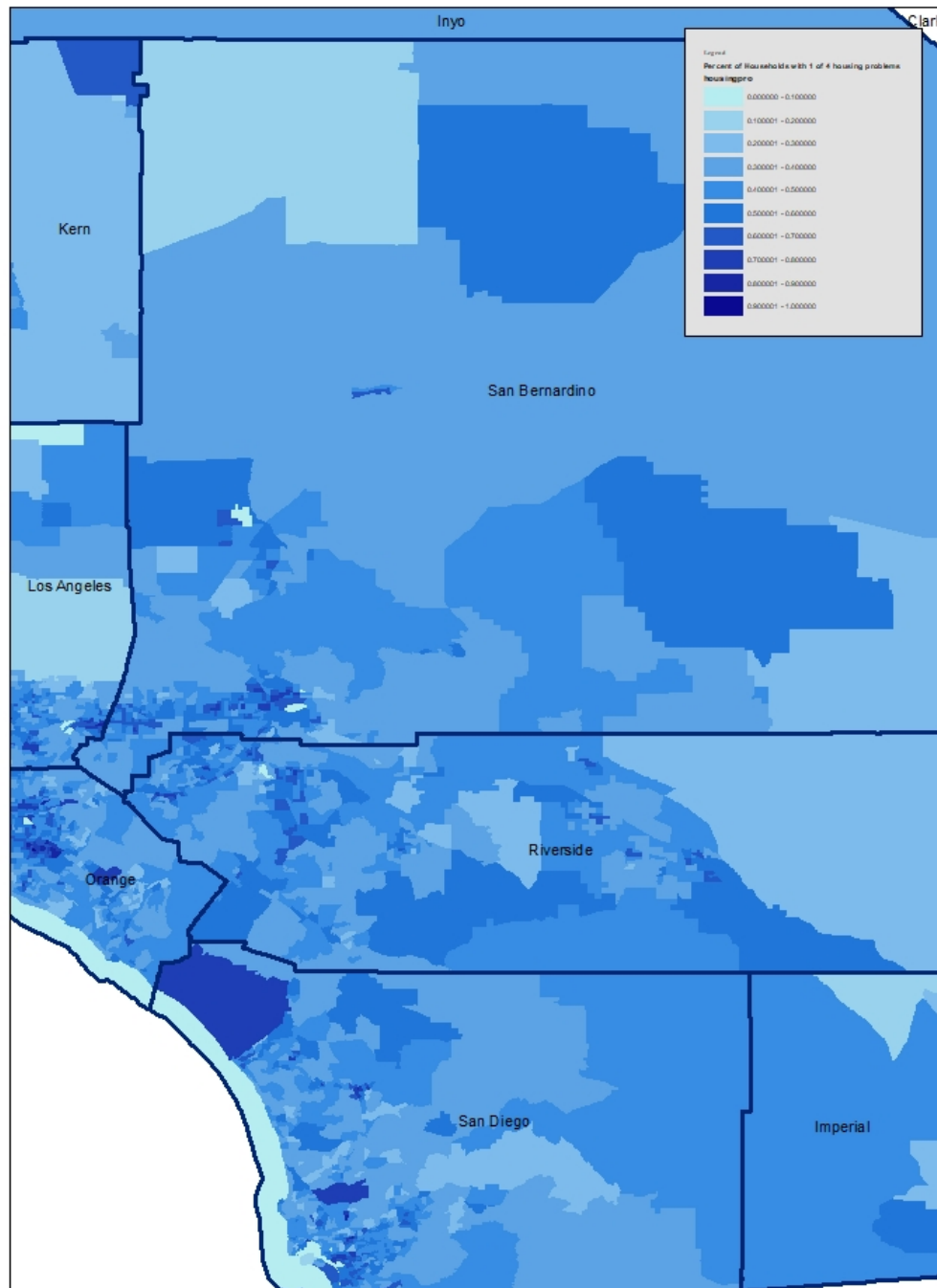
Map 3: Households with Disproportionate Housing Needs by Race, region



Map 4: Households with Disproportionate Housing Needs by National Origin, region



Map 5: Households with Disproportionate Housing Needs, no overlays (easier to read)



Ontario is one of several cities in the region, including San Bernardino and Riverside, that has a high rate of housing problems, especially in areas that qualify as R/ECAPs. Areas with more Black and Hispanic residents, primarily in the western part of the city, have noticeably higher rates of housing problems. Residents of Mexican national origin are also more concentrated in these areas.

Regionally, most residents in San Bernardino and Riverside counties are found in the southeast area of the region, which experiences varied rates of housing problems. Parts of San Bernardino, Corona, Moreno Valley, Fontana, and Rialto experience rates of housing problems similar to those in northern Ontario. These areas tend to be R/ECAPs as well. While the more rural areas of the region generally experience less housing problems, Adelanto and Fort Irwin similarly experience higher rates. The patterns discussed earlier, with respect to rates of housing problems, are visible in the maps as well. In general, most of the region experiences higher rates of housing problems in areas with a higher concentration of Hispanic and Black residents, as well as residents of Mexican national origin.

Table 4: Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, Ontario

	Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	0	0.00%	0	0.00%	N/A	N/A
Project-Based Section 8	101	55.49%	46	25.27%	34	18.68%	51	28.02%
Other Multifamily	137	100.00%	0	0.00%	0	0.00%	N/A	N/A
HCV Program	142	25.04%	279	49.21%	110	19.40%	234	41.27%
Note 1: Data Sources: APSH (see HUD Data Documentation for more details)								

- 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.*

The City of Ontario has no public housing units. Options for households with children and those with large households include the Housing Choice Voucher Program and Project-Based Section 8 housing. All Other Multifamily units are in 0-1-bedroom units in developments and are restricted to seniors.

- d. Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and region.*

Table 5: Housing Tenure by Race

	Ontario city, California	Riverside-San Bernardino-Ontario, CA Metro Area
White, Non-Hispanic Householders	11,560	595,385
Owner occupied	7,718	422,456
Renter occupied	3,842	172,929
Black Householders	3,786	104,691
Owner occupied	1,439	43,898
Renter occupied	2,347	60,793
Native American Householders	391	11,033
Owner occupied	186	5,702
Renter occupied	205	5,331
Asian or Pacific Islander Householders	3,140	87,005
Owner occupied	1,837	60,820
Renter occupied	1,303	26,185
Hispanic Householders	29,854	522,460
Owner occupied	15,013	291,047
Renter occupied	14,841	231,413

- e. Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and region.*

Hispanic residents make up the majority of homeowners in Ontario; approximately one-half are owners and one-half are renters. White residents have fewer numbers of owners (as reflected by the city's demographics) but higher rates of homeownership. In comparison, Black households have a significantly lower rate of households. The rates of homeownership in the city is similar to those in the region, with similar disparities with respect to race/ethnicity.

Additional Information

- 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.*
- 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.*

Homelessness

The 2019 San Bernardino County homeless count identified 128 homeless residents in Ontario, an increase of 38 from the previous year.⁵ Approximately 94 residents were unsheltered, 29 were living in transitional housing, and 5 were staying in shelters. Almost three-quarters of persons experiencing homelessness were male and one-half identified as Hispanic, significantly less than the overall population of Ontario. In the County, cities with higher numbers of people experiencing homelessness include Victorville (333), Redlands (183), and Rialto (133).

Contributing Factors of Disproportionate Housing Needs

Please see the Appendix for the following Contributing Factors to Disproportionate Housing Needs:

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of affordable housing
- Source of income discrimination

⁵ <http://wp.sbcounty.gov/dbh/sbchp/wp-content/uploads/sites/2/2019/05/2019-homeless-count-and-survey-report.pdf>

C. Publicly Supported Housing Analysis

1. Analysis

A. Publicly Supported Housing Demographics

The Publicly Supported Housing section analyzes federally funded affordable housing and other types of affordable housing, to determine whether the level of need is being met and whether patterns of affordable housing siting concentrate minorities in low opportunity areas, among other indicators.

As used in this document publicly supportive affordable housing project(s) including projects that are Public Housing units, units funded through HUD voucher programs, including Section 8, Project-Based Vouchers, HUD Section 202, and other programs, and units developed utilizing Low Income Housing Tax Credit (LIHTC) dollars. The City of Ontario has a robust affordable housing program that includes privately-owned deed-restricted affordable housing units using a variety of public funding sources. These additional 1,196 have a range of affordability restrictions from very low-income tenants (those with incomes at or below 50% of AMI) to moderate-income tenants (those with incomes at or below 120% of AMI). The analysis in this document does not include data for these other deed-restricted affordable housing units.

Table 1: Publicly Supported Housing Units by Program Category

Housing Units	Ontario	
	#	%
Total housing units	47,423	-
Public Housing	N/A	N/A
Project-based Section 8	186	0.39%
Other Multifamily	137	0.29%
HCV Program	531	1.11%
LIHTC	501	1.06%
Note: This table represents all units in projects within each Program Category, including units reserved for property managers. Other tables within the document consider a subset of these units based on demographic characteristics of residents.		

In Ontario, there are Project-Based Section 8, Other Multifamily Housing, Housing Choice Voucher, and LIHTC units, but no Public Housing units. Publicly supported housing (but not all affordable housing) makes up slightly under 3% of the total housing stock. Housing Choice Vouchers predominate, followed by LIHTC units. Overall, it is clear that the amount of publicly supported housing available in Ontario does not rise to meet the level of need, although progress is being made.

LIHTC

According to the California Tax Credit Allocation Committee, there are four Low Income Housing Tax Credit (LIHTC) developments in Ontario (two at the same address), all of which are designated for seniors. Of the 262 LIHTC units, 257 are low-income units. There are currently no family LIHTC developments in Ontario.

- i. *Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV) in the jurisdiction?*

Table 2: Publicly Supported Housing Demographics

Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/A	N/A	0	0.00%	N/A	N/A	N/A	N/A
Project-Based Section 8	24	13.26%	25	13.81%	86	47.51%	45	24.86%
Other Multifamily	31	23.13%	16	11.94%	43	32.09%	44	32.84%
HCV Program	69	13.22%	239	45.79%	191	36.59%	18	3.45%
Total Households	12,208	26.97%	3,294	7.28%	26,840	59.29%	2,153	4.76%
0-30% of AMI	1,279	24.64%	459	8.84%	3,095	59.63%	265	5.11%
0-50% of AMI	1,883	18.18%	859	8.30%	6,890	66.54%	364	3.52%
0-80% of AMI	3,813	19.77%	1,279	6.63%	12,920	67.00%	769	3.99%
Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	108	17.45%	203	32.79%	265	42.81%	42	6.79%
Project-Based Section 8	1,245	24.20%	1,055	20.51%	2,439	47.41%	366	7.12%
Other Multifamily	672	31.88%	252	11.95%	770	36.53%	404	19.17%
HCV Program	4,542	24.88%	8,293	45.43%	4,965	27.20%	386	2.11%
Total Households	615,660	47.84%	96,380	7.49%	469,370	36.47%	75,739	5.88%
0-30% of AMI	61,410	38.82%	18,475	11.68%	65,705	41.54%	7,940	5.02%
0-50% of AMI	101,180	32.18%	30,355	9.65%	137,770	43.82%	13,890	4.42%
0-80% of AMI	192,920	36.04%	45,500	8.50%	237,820	44.42%	23,430	4.38%

Source: IMS/PIC; See HUD Data Documentation for more information

In Ontario, Hispanic households represent the most frequent majority group in Project-Based Section 8 developments. Black households are the majority group in the Housing Choice Voucher Program, and Asian or Pacific Islander households are the majority group in Other Multifamily. Hispanic residents in its Project-Based Section 8 units.

Asian or Pacific Islander households account for 32.84% of occupants of Other Multifamily units and 24.86% of Project-Based Section 8 units, yet they comprise only 4.76% of the population. Black households make up 45.79% of all participants in the Housing Choice Voucher Program yet their overall number of households is only 7.28%. Hispanic households have a lower utilization rate of publicly assisted housing because they comprise 59.29% of all households but have lower utilization rates across all categories. Overall, it seems that different program categories have very different demographic breakdowns. Hispanic households are more likely to occupy Project-Based Section 8 units, Asian American or Pacific Islander households are more likely to occupy Other Multifamily units, and Black households are more likely to utilize Housing Choice Vouchers.

- ii. *Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.*

In the region, Hispanic households reside in a plurality of units in the Public Housing, Project-Based Section 8, and Other Multifamily housing categories. As in Ontario, Black households in the region are the plurality group in the Housing Choice Voucher program. Similarly, Asian American or Pacific Islanders are more likely to occupy Other Multifamily units than other types of publicly supported housing.

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

In Ontario, there is a significantly higher proportion of Asian American or Pacific Islander households in Project-Based Section 8 units and a slightly higher proportion of Black households than there is in the general population. Correspondingly, there is a lower percentage of Hispanic and White residents represented. When broken down by income eligibility, the proportion of Asian or Pacific Islanders drop while the percentage of Black and White residents increase. Among voucher holders, on the other hand, Black are overrepresented and Hispanics, Asian or Pacific Islanders, and Whites are underrepresented as compared to the general population. In Other Multifamily units, Asian or Pacific Islander households are significantly overrepresented, Black households slightly overrepresented, and Hispanics and Whites are underrepresented. When broken down by income eligibility, Hispanic, Black, and Asian or Pacific Islander households are proportionally represented and Whites are slightly underrepresented.

In the region, Public Housing, Project-Based Section 8 units are disproportionately resided in by Black and Hispanic households, proportionally resided in by Asian or Pacific Islander households, and underutilized by White households. Asian Pacific Islander and Black households are overrepresented in Other Multifamily units while Hispanic households are proportionally represented and White households are underrepresented. For the Housing Choice Voucher Program. Black households are significantly overrepresented while Hispanic, Asian or Pacific Islander, and white households are underrepresented. When accounting for income, each group is proportionately represented.

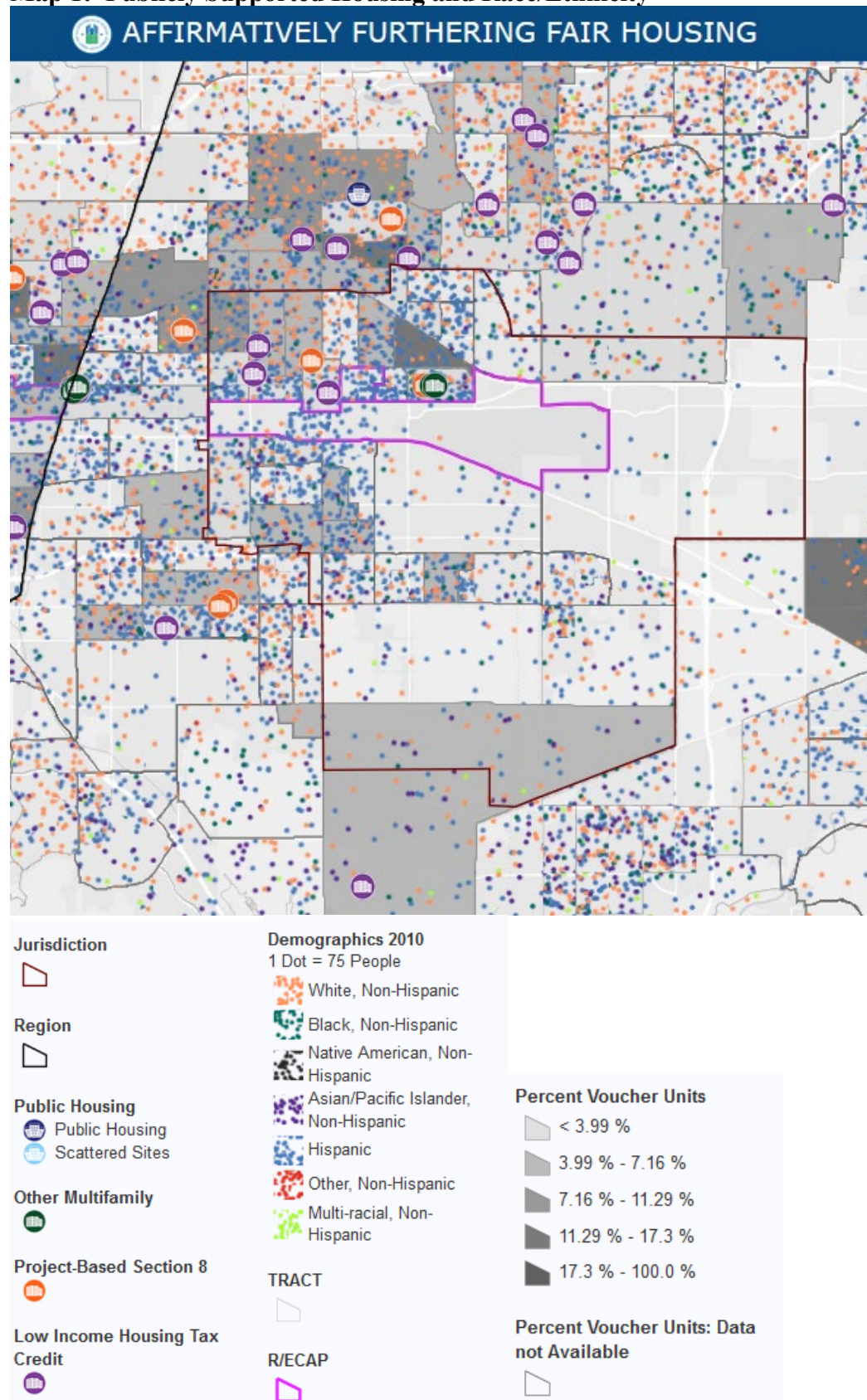
B. Publicly Supported Housing Location and Occupancy

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

Publicly supported housing in Ontario is concentrated near or in R/ECAPs north of the Ontario International Airport. Two other multifamily and one Project-Based Section 8 development are contiguous to each other. Housing Choice Voucher Program participants are more likely to live in the northern part of Ontario near the other publicly supported housing developments but are also located in the areas south of the airport.

In the region, publicly supported housing is clustered in and near the R/ECAPS of San Bernardino, Riverside, Indio, Mecca, and Coachella, as well as in Upland, Fontana, Rialto, Hesperia and Victorville. Areas with a higher percentage of Housing Choice Voucher program participants include the area near John Galvin Park in Ontario, Upland, San Bernardino, Riverside, Moreno Valley, Redlands, Highland, and Palm Springs.

Map 1: Publicly Supported Housing and Race/Ethnicity



- iii. *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 in the jurisdiction and region.*

In Ontario, Ontario Townhouses, a Project-Based Section 8 development for families, is located adjacent to two Other Multifamily senior housing developments in a predominantly Hispanic neighborhood north of the airport. In the region, Other Multifamily developments for seniors and people with disabilities tend to clustered near each other in areas with higher numbers of Housing Choice Voucher Program participants.

- iv. *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 in the jurisdiction and region?*

Table 3: Publicly Supported Housing Demographics by R/ECAP and Non R/ECAP Tracts

(Ontario, CA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/A	N/A	0.00%	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	N/A	N/A	0.00%	N/A	N/A	N/A	N/A	N/A
Project-based Section 8								
R/ECAP tracts	N/A	N/A	0.00%	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	180	13.26%	13.81%	47.51%	24.86%	28.02%	63.19%	4.95%
Other Multifamily								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	137	23.13%	11.94%	32.09%	32.84%	N/A	100.00%	0.00%
HCV Program								
R/ECAP tracts	10	0.00%	8.33%	91.67%	0.00%	30.77%	23.08%	15.38%
Non R/ECAP tracts	465	13.53%	46.67%	35.29%	3.53%	41.52%	28.16%	25.63%

Source: IMS/PIC; See HUD Data Documentation for more information

The above table shows that there are no publicly supported housing units in R/ECAPs except for ten Housing Choice Voucher Program participants. Most of these voucher holders are Hispanic households. Note that HUD calculates R/ECAPS at 40% or more individuals living at or below the poverty limit while this analysis calculates R/ECAPS at 25% poverty rate threshold so there are publicly supported housing units listed as not being in R/ECAPs in the table that are in fact located in R/ECAPs.

Based on the population density found in Southern California, this document evaluates R/ECAPS using a 25% threshold, instead of the HUD threshold of 40% or more of individuals within a census tract that are living at or below the poverty limit. This regional threshold better illustrates areas that could be considered R/ECAPS, allowing policy makers to design policy and implement projects that take these areas into consideration.

- iv. *A. Do any developments of public housing and properties converted under the RAD have a significantly different demographic composition, in terms of protected class than other developments of the same category for the jurisdiction? Describe how these developments differ.*

Table 4: Publicly Supported Housing Demographics

Project-Based Section 8								
(Ontario, CA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
The Grove	N/A	N/A	100	16	4	38	42	N/A
Ontario Townhouses	N/A	N/A	86	10	26	60	4	64
Other Multifamily Assisted Housing								
(Ontario, CA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Ontario Senior Housing Inc.	N/A	N/A	90	17	13	43	27	N/A
D Street Senior Housing	N/A	N/A	47	36	11	11	43	N/A

Source: IMS/PIC; See HUD Data Documentation for more information

The Grove and D Street Senior Housing has a disproportionately high rate of Asian or Pacific Islander households, and Ontario Townhouses has a disproportionately high rate of Black households. Hispanic households are significantly underrepresented in D Street Senior Housing and proportionately represented in Ontario Townhouses.

- iv. *B. Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.*

Effective January 2020, the Tenant Protection Act of 2019, a statewide rent gouging law, restricts rent increases to 5% plus the local rate of inflation per year. As of January 2020, the rate of inflation in the region was 3.1%.

In October 2019, Governor Newsom signed into law SB 329, prohibiting discrimination in housing based on source of income statewide.

- v. *Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, 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.

Ontario's publicly supported housing developments generally either mirror the demographics of the city or are more heavily Black, Hispanic, and Asian-Pacific Islander than the surrounding developments. White households are underrepresented in every publicly supported housing development. There is no Public Housing in the city.

c. Disparities in Access to Opportunity

- i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other 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.*

In Ontario, residents of publicly supported housing developments are not subject to significant disparities in access to opportunity as access to opportunity measurements are similar across all racial and ethnic categories. Ontario's access to high performing schools, employment opportunity, and public transportation is higher than the those of the region. However, Ontario's Environmental Health Index is significantly lower than the region as a whole.

Although publicly supported housing (Project Based Section 8 properties and HUD Section 202 properties) in Ontario and the region is more concentrated in R/ECAPs and other areas with a higher concentration of Hispanic and Black households, there are not significant variations in opportunity indexes across populations.

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.

Please see the Appendix for the following Contributing Factors to Publicly Supported Housing Location and Occupancy:

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility

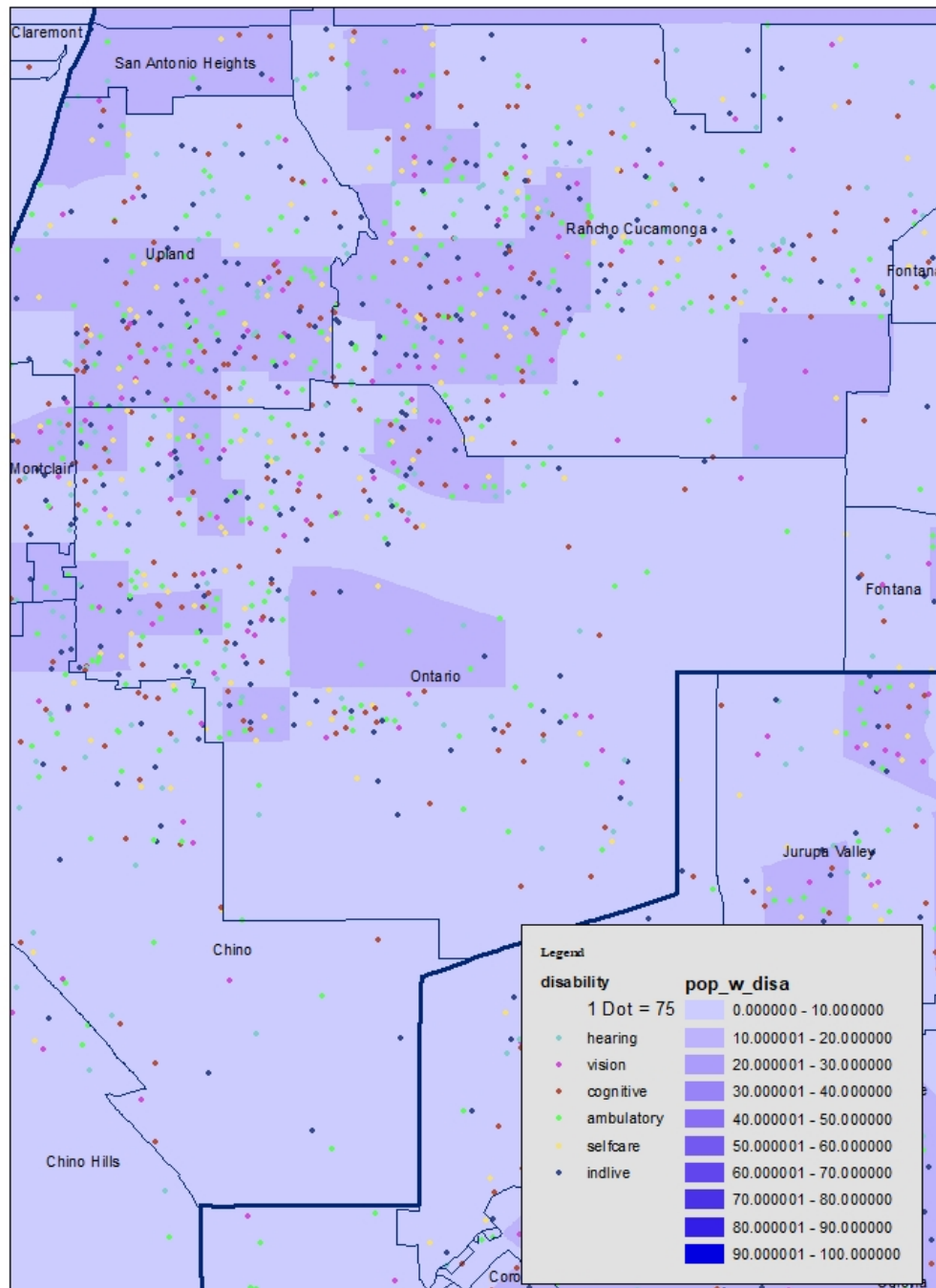
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access for individuals with limited English proficiency
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of affordable housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination

D. Disability and Access

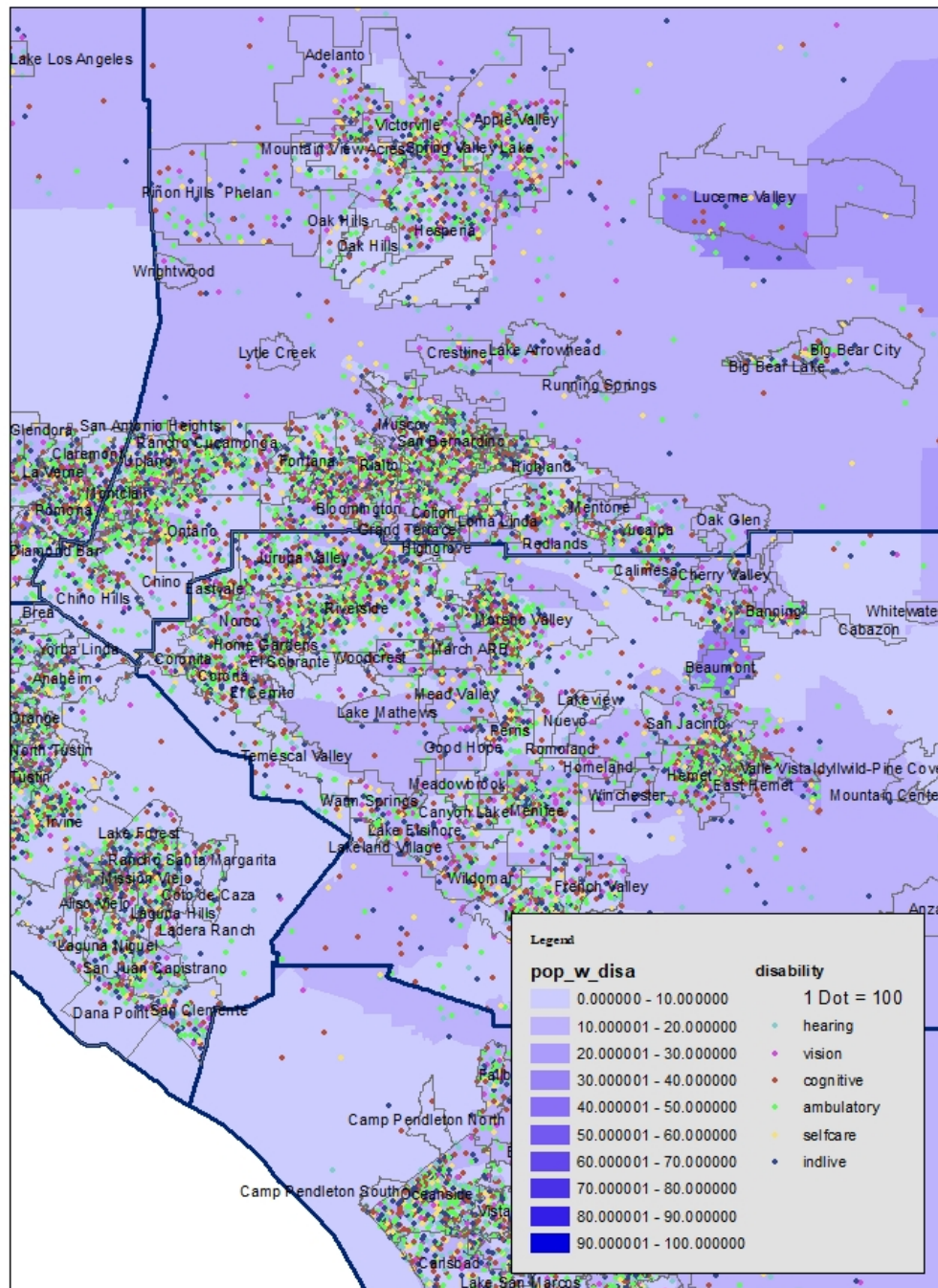
Congress added protections against housing discrimination for persons with disabilities to the Fair Housing Act in 1988. In addition to protection against intentional discrimination and unjustified policies and practices with disproportionate effects, the Fair Housing Act includes three provisions that are unique to persons with disabilities. The Fair Housing Act prohibits the denial of requests for reasonable accommodations for persons with disabilities if necessary to afford an individual equal opportunity to use and enjoy a dwelling. Reasonable accommodations are departures from facially neutral policies and are generally available if granting the accommodation request would not place an undue burden on the party providing the accommodation and where granting the accommodation request would not result in a direct threat to the health or safety of others. Permitting an individual with an anxiety disorder to have a dog in their rental unit as an emotional support animal despite a broad “no pets” policy is an example of a reasonable accommodation. The Act also prohibits the denial of reasonable modification requests. Modifications involve physical alterations to a unit, such as the construction of a ramp or the widening of a door frame, and must be paid for by the person requesting the accommodation unless the unit receives federal financial assistance and is subject to Section 504 of the Rehabilitation Act. Lastly, the design and construction provision of the Fair Housing Act requires most multi-family housing constructed since 1991 to have certain accessibility features. This section of the Analysis looks at the housing barriers faced by persons with disabilities, including those that result in the segregation of persons with disabilities in institutions and other congregate settings.

1. Population Profile

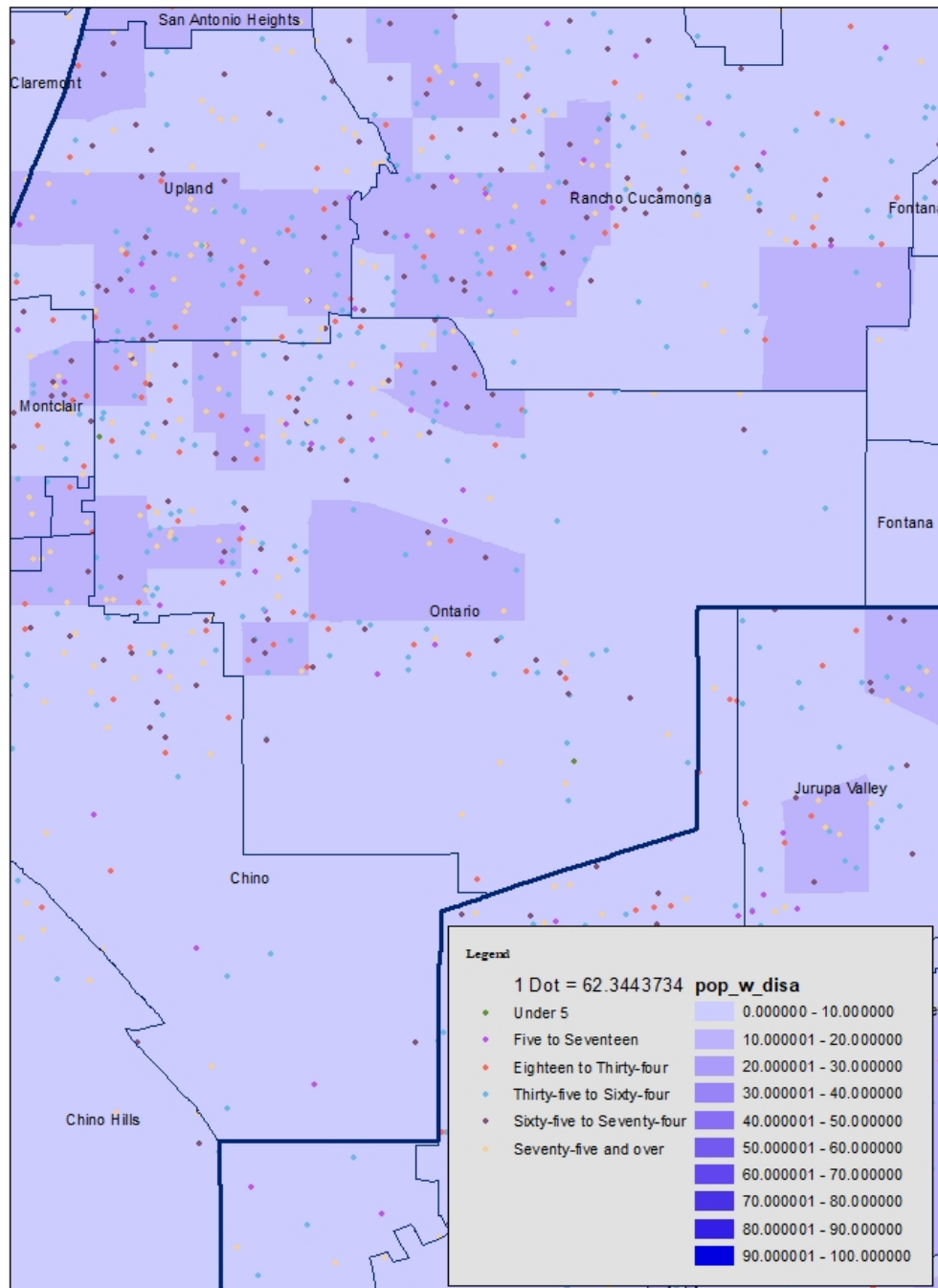
Map 1: Disability by Type, Ontario



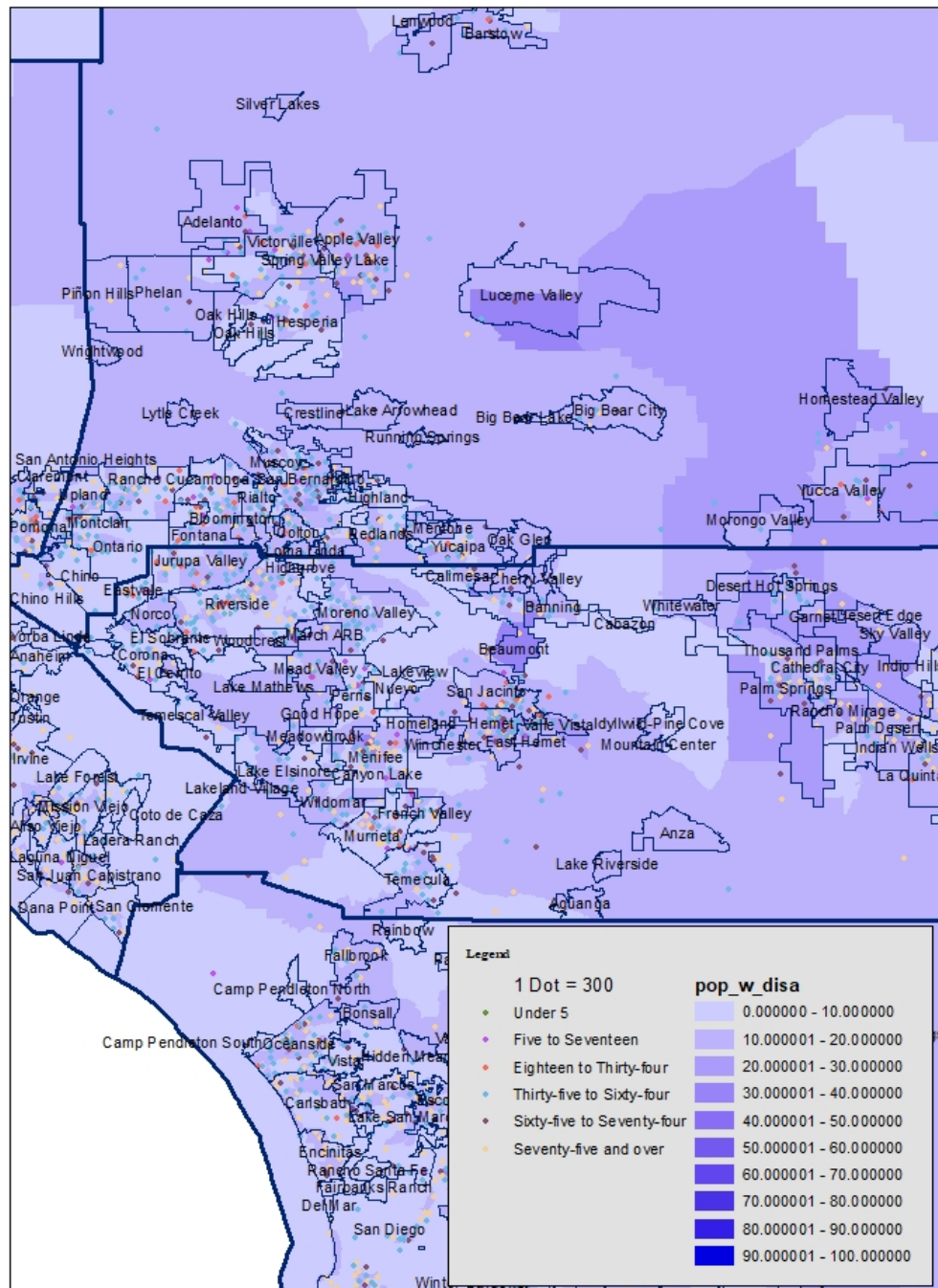
Map 2: Disability by Type, region



Map 3: Disability by Age, Ontario



Map 4: Disability by Age, region



Map 5: Percent of Population with a Disability, region

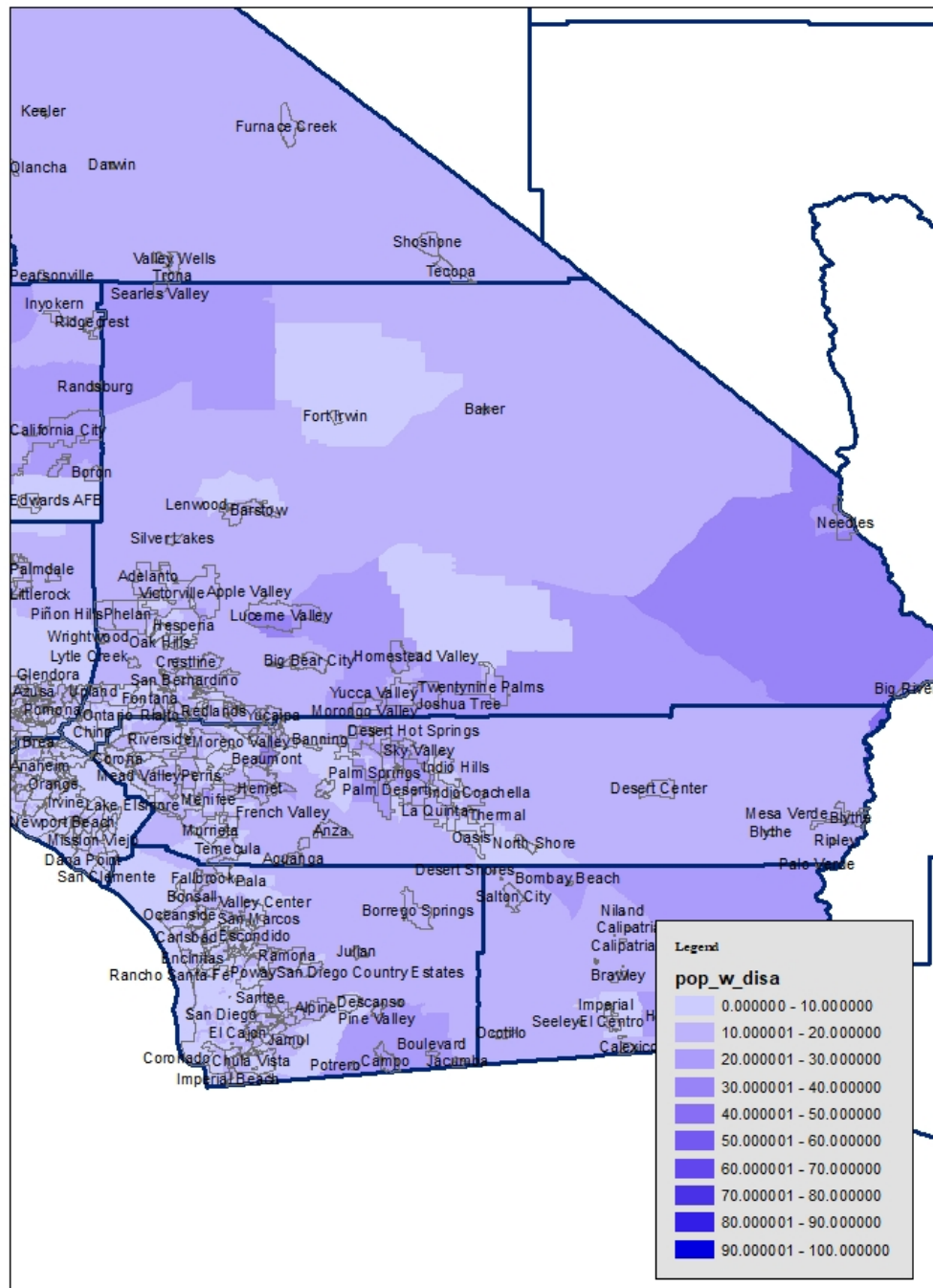


Table 1: Disability by Type, Ontario

Disability Type	#	%
Any disability	14,990	8.8%
Hearing Difficulty	3,547	2.1%
Vision Difficulty	2,853	1.7%
Cognitive Difficulty	5,182	3.3%
Ambulatory Difficulty	8,104	5.1%
Self-Care Difficulty	3,276	2.1%
Independent Living Difficulty	5,245	4.2%

Source: American Community Survey, 2013-2017 Estimates

Table 2: Disability by Type, region

Disability Type	#	%
Any disability	495,767	11.3%
Hearing Difficulty	134,692	3.1%
Vision Difficulty	98,573	2.2%
Cognitive Difficulty	185,324	4.5%
Ambulatory Difficulty	264,490	6.5%
Self-Care Difficulty	110,137	2.7%
Independent Living Difficulty	187,680	5.8%

Source: American Community Survey, 2013-2017 Estimates

- a. *How are people with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

Within Ontario, there are three census tracts with a notably higher percentage of residents with disabilities compared to the city as a whole. These include Census Tract 14 in the downtown area of the city, Census Tract 13.12 in the northeastern portion of the city, and Census Tract 18.03 in south Ontario. None of these areas are R/ECAPs. All have majority-Hispanic populations as does the city as a whole. Census Tract 14 in the center of the city is similar demographically to the city as a whole while Census Tract 13.12 has higher concentrations of Black and Asian and Pacific Islander residents and Census Tract 18.03 has a higher concentration of White residents.

In the region more broadly, the areas with the highest concentrations of persons with disabilities include parts of Upland, the downtown of the city of San Bernardino as well as part of the northeastern corner of that city, parts of Victorville, rural areas within the High Desert, and much of the Coachella Valley. For the most part, these areas do not coincide with R/ECAPs or other areas of racial or ethnic segregation though both downtown San Bernardino and the portion of Victorville that has a concentration of persons with disabilities have concentrations of persons with disabilities. Other areas with concentrations of persons with disabilities tend to have older populations, which are disproportionately white.

- b. Describe whether these geographic patterns vary for people with each type of disability or for people with disabilities in different age ranges for the jurisdiction and region.*

There are some differences in the concentration of persons with disabilities by the type of disability within the city of Ontario. People with hearing and vision disabilities are somewhat concentrated in the northern part of the city, people with cognitive disabilities are fairly evenly distributed throughout the city, people with ambulatory disabilities are concentrated in the downtown and southeastern portions of the city, and people with both self-care and independent living disabilities are concentrated in the downtown portion of the city. In the broader region, people with hearing and vision disabilities are concentrated in Hemet and parts of the Coachella Valley. People with cognitive disabilities are concentrated in Hemet, the city of San Bernardino, and parts of the High Desert. People with ambulatory disabilities are concentrated in Beaumont, Hemet, Menifee, parts of the city San Bernardino, parts of the Coachella Valley, and parts of the High Desert. People with self-care disabilities are concentrated in Hemet, Menifee, parts of the Coachella Valley, and parts of the High Desert. People with independent living disabilities are concentrated in Beaumont, Hemet, Menifee, the city of San Bernardino, Victorville, much of the Coachella Valley, and parts of the High Desert. These areas do not consistently and predictably coincide with R/ECAPs and areas of racial and ethnic segregation.

By age, within Ontario, children with disabilities are most concentrated in downtown Ontario as well as in the central portion of the city stretching west from Ontario International Airport. The latter area is a R/ECAP. Working-age adults with disabilities are concentrated in south Ontario. Elderly persons with disabilities are concentrated in south and northeast Ontario. Regionally, children with disabilities are concentrated in Hemet and parts of the Coachella Valley; working-age adults with disabilities are concentrated in Beaumont, Hemet, Menifee, the city of San Bernardino, and the city of Victorville; and elderly persons with disabilities are concentrated in Chino, Hemet, Lake Elsinore, the western portion of the city of Riverside, the city of San Bernardino, and the city of Victorville. It is important to note that this data reflects the concentration of persons within an age range in a place who have disabilities rather the total number of people with disabilities in an age range. Thus, places with concentrations of elderly residents and therefore concentrations of elderly persons with disabilities, like the Coachella Valley, do not necessarily appear to have such concentrations. In general, places with concentrations of children with disabilities tend to be more heavily Black and/or Hispanic than the broader region. At a high level, there is not a significant relationship between R/ECAPs and areas of concentration of persons with disabilities by age though several areas within the city of San Bernardino that have concentrations are R/ECAPs.

2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*

Overall, there is a significant shortage of affordable, accessible housing in a range of unit sizes in both Ontario and in the broader region. This subsection contains a review of the common sources of affordable, accessible housing. It is important to consider these sources of affordable, accessible

housing in light of the demographic data discussed above. Specifically, there are 8,097 persons with ambulatory disabilities in Ontario and 265,207 in the region. Additionally, there are 3,751 persons with hearing disabilities and 3,244 persons with vision disabilities in Ontario. There are 135,219 persons with hearing disabilities and 98,160 persons with vision disabilities in the region. These categories are not mutually exclusive, and not all people within them need affordable housing. Nonetheless, disability status is highly correlated with socioeconomic status, so there is disproportionate need for affordable housing from among this population.

Accessibility Requirement for Federally-Funded Housing

Section 504 of the Rehabilitation Act of 1973 imposes enhanced accessibility requirements on units that have received federal financial assistance. Such units include, but are not limited to, Public Housing, Project-Based Section 8, Section 202 and Section 811, and units assisted with HOME and/or CDBG funds. The issue of whether Section 504 applies to Low Income Housing Tax Credit (LIHTC) units is unsettled as a question of federal law, but the California Tax Credit Allocation Committee now requires a level of accessibility that meets the requirements of Section 504 as part of its application process. Under Section 504, 5% of units in developments built or substantially renovated since 1973 must be accessible to persons with mobility disabilities and 2% of units must be accessible to persons with sensory disabilities. In Ontario, there are 186 units of Project-Based Section 8 housing in two developments and 137 units of Other Multifamily housing in two developments, both of which are Section 202 developments for seniors. HUD's SNAPSHOT of HOME Program Performance for Ontario through September 30, 2019 reports that there are 120 Section 504-compliant HOME-assisted units in Ontario. Regionally, outside of Ontario, there is relatively limited publicly supported housing stock in comparison to other major metropolitan areas in California. Across programs or types of publicly supported housing, the limited stock that exists is somewhat concentrated in the cities of Corona, Fontana, Hemet, Moreno Valley, Rialto, Riverside, San Bernardino, and Victorville. There are only 618 Public Housing units, 5,105 Project-Based Section 8 units, and 2,098 Other Multifamily units in the region.

Low Income Housing Tax Credit (LIHTC) Units

There are currently six LIHTC developments in the city of Ontario that include a total of 501 units. Most were placed in service from 1998 through 2010. This means that most of the developments are covered by the design and construction standards of the Fair Housing Act, which went into effect in 1991. It is worth noting that there are two LIHTC developments in the pipeline that will ultimately include 176 units. These developments are not expected to be age-restricted and will be subject to accessibility requirements that mirror Section 504. Regionally, LIHTC housing follows similar patterns as the other types of publicly supported housing discussed above; however, Ontario is not representative of the broader region insofar as that family-occupancy and senior LIHTC housing are more balanced throughout the region.

Housing Choice Vouchers and Fair Housing Amendments Act Units

Acceptance of a tenant's Housing Choice Voucher does not require a landlord to modify or retrofit their unit to meet the accessibility requirements of Section 504; vouchers, however, can often be a tool that enables persons with disabilities and, in particular, non-elderly persons with disabilities

to access relatively recently constructed nonsubsidized multifamily housing that meets the design and construction standards of the Fair Housing Act. In Ontario, 527 households are assisted with vouchers, a much larger number than reside in Project-Based Section 8 and Other Multifamily housing. While nearly all publicly supported existing site-based affordable housing in Ontario is restricted to seniors, only about one-quarter of voucher holders are seniors. This analysis does not include privately-owned deed-restricted affordable housing units. Unfortunately, American Community Survey data reflecting the age of multifamily housing lumps together housing constructed from 1980 through 1999 rather than allowing a review of the subset of housing built from 1991 to the present. Additionally, the design and construction standards apply to units in structures with four or more units while the American Community Survey does not disaggregate three-unit structures from four-unit structures. In Ontario, there are 1,860 units in structures with five or more units that have been built from 2000 to the present and an additional 4,722 units in structures of that size built from 1980 through 1999. If 45% of those units were built from 1991 through 1999, that would mean that at least another 2,125 units were subject to the design and construction standards of the Fair Housing Act. In the region, there are 40,233 units in structures with five or more units that have been built from 2000 to the present and an additional 72,731 units in structures of that size built from 1980 through 1999. If 45% of those units were built from 1991 through 1999, that would mean that at least another 32,729 units were subject to the design and construction standards of the Fair Housing Act.

Summary

In light of the data reflecting the scope of the likely need for affordable, accessible housing, it is clear that there is a shortage of such housing, both in Ontario and in the region. Within Ontario, given the preponderance of senior housing among developments with hard units of affordable housing, that unmet need is especially pronounced among non-elderly persons with disabilities who are in need of accessible units. For that population, it is especially important that there be a broader range of unit sizes, including more two and three-bedroom units. Although the Housing Choice Voucher program often serves people with accessibility needs who need larger units, it is not a substitute for hard units of housing built to the specifications of Section 504.

- b. Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?*

In Ontario, the limited affordable, accessible housing that exists is not located in R/ECAPs. The areas in which that housing is located are heavily Hispanic but not disproportionately so in comparison to citywide demographics. New market rate development in the city has focused heavily on greenfields in the southern portion of the city, which is slightly more heavily White than the city as a whole. Over time, that should create opportunities for Housing Choice Voucher holders to reside in accessible units in relatively integrated areas. Regionally, affordable, accessible housing is more segregated than in Ontario with cities that are more heavily Black and Hispanic than the region as a whole being home to a large share publicly supported housing, in particular. There are some exceptions to this, including Corona and Hemet, which, though not majority-White and significantly more heavily White than cities like Ontario, Fontana, and San Bernardino.

- c. *To what extent are people with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?*

Table 3: Disability by Publicly Supported Housing Program Category

Jurisdiction	People with a Disability	
	#	%
Public Housing	N/A	N/A
Project-Based Section 8	9	4.95%
Other Multifamily	0	0.00%
HCV Program	144	25.40%
Region	#	%
Public Housing	82	12.75%
Project-Based Section 8	520	9.86%
Other Multifamily	73	3.35%
HCV Program	5,235	27.51%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIC (See HUD Data Documentation for more details).

The data above suggests that persons with disabilities are significantly underrepresented in Project-Based Section 8 and other multifamily housing, both in Ontario and in the broader region. As the discussion of accessible housing above illustrates, this may be an inaccurate conclusion. Both other multifamily housing developments in Ontario are Section 202 developments. This program provides senior housing with a focus on meeting the supportive services needs of residents, who often have disabilities. In tracking demographic data for some housing programs, persons with disabilities and elderly individuals are sometimes treated as mutually exclusive categories because membership in either category would qualify a person for housing. Nonetheless, it is highly likely that many of the elderly residents of Ontario's Section 202 developments have disabilities in addition to being elderly. The representation of persons with disabilities in the Housing Choice Voucher program is much more in line with the share of the income-eligible population likely comprised of persons with disabilities. In Public Housing, none of which exists in Ontario, persons with disabilities appear to be somewhat underrepresented.

3. Integration of People with Disabilities Living in Institutions and Other Segregated Settings

- a. *To what extent do people with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

Up until a wave of policy reforms and court decisions in the 1960s and 1970s, states, including California, primarily housed persons with intellectual and developmental disabilities and individuals with psychiatric disabilities in large publicly-run institutions. In California, institutions for persons with intellectual and developmental disabilities are called developmental centers, and institutions for persons with psychiatric disabilities are called state hospitals. Within these institutions, persons with disabilities have had few opportunities for meaningful interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from housing persons with disabilities in institutional settings and toward providing housing and services in home and community-based settings

accelerated with the passage of the Americans with Disabilities Act in 1991 and the U.S. Supreme Court’s landmark decision in *Olmstead v. L.C.* in 1999. In *Olmstead*, the Supreme Court held that, under the regulations of the U.S. Department of Justice (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to persons with disabilities, it must do so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. This obligation is not absolute and is subject to the ADA defense that providing services in a more integrated setting would constitute a fundamental alteration of the state or local government’s programs.

The transition from widespread institutionalization to community integration has not always been linear, and concepts of what comprises a home and community-based setting have evolved over time. Although it is clear that developmental centers and state hospitals are segregated settings and that an individual’s own house or apartment in a development where the vast majority of residents are individuals without disabilities is an integrated setting, significant ambiguities remain. Nursing homes and intermediate care facilities are clearly segregated though not to the same degree as state institutions. Group homes fall somewhere between truly integrated supported housing and such segregated settings, and the degree of integration present in group homes often corresponds to their size.

Below, this assessment includes detailed information about the degree to which persons with intellectual and developmental disabilities and individuals with psychiatric disabilities reside in integrated or segregated settings. The selection of these two areas of focus does not mean that persons with other types of disabilities are never subject to segregation. Although the State of California did not operate analogous institutions on the same scale for persons with ambulatory or sensory disabilities, for example, many people with disabilities of varying types face segregation in nursing homes. Data concerning persons with various disabilities residing in nursing homes is not as available as data relating specifically to persons with intellectual and developmental disabilities and persons with psychiatric disabilities.

**Table 4: Intellectual and Developmental Disabilities
Performance of Tri-Counties Regional Center, December 2019**

Dec. 2019 Performance Reports	Fewer consumers live in developmental centers	More children live with families	More adults live in home settings	Fewer children live in large facilities (more than 6 people)	Fewer adults live in large facilities (more than 6 people)
State Average	0.08%	99.44%	80.84%	0.04%	2.15%
Inland Regional Center	0.06%	99.30%	81.16%	0.11%	1.07%

In California, a system of regional centers is responsible for coordinating the delivery of supportive services primarily to individuals with intellectual and developmental disabilities. The regional centers serve individuals with intellectual disabilities, individuals with autism spectrum disorders, individuals with epilepsy, and cerebral palsy. These disabilities may be co-occurring. Although there is some variation from regional center to regional center, individuals with intellectual

disabilities and individuals with autism spectrum disorder predominate among consumers. All data regarding the regional centers is drawn from their annual performance reports.

In the region, there is one regional center – the Inland Regional Center – that serves all of Riverside and San Bernardino Counties. Unfortunately, the Inland Regional Center does not disaggregate its publicly reported data by to allow an Ontario-specific or San Bernardino County-specific.

On an annual basis, regional centers report to the California Department of Developmental Services on their performance in relation to benchmarks for achieving community integration of persons with intellectual and developmental disabilities. As reflected in the table above, the Inland Regional Center simultaneously has lower rates of persons with developmental disabilities living in institutional settings and higher rates of adults with developmental disabilities living in home or family-based settings than statewide but slightly lower rates of children with developmental disabilities living in integrated settings.

The California Department of Developmental Services' Fairview Developmental Center, located in Costa Mesa in Orange County, is the last remaining large, state-run institution for persons with developmental disabilities in Southern California. The facility is scheduled to close by the end of 2021. The Department of Developmental Services and the regional centers are working to transition remaining residents to community-based settings. Relatively few residents of Fairview Developmental Center who are in the process of transitioning are from the service area of the Inland Regional Center. In Fiscal Year 2019-2020, the Department of Developmental Services planned to help 43 individuals at Fairview to transition. Only one of those individuals was from Riverside and San Bernardino Counties.

Table 5: Type of Setting by Race or Ethnicity, Inland Regional Center, 2018-2019

Type of Setting	Total Served	% Non-Hispanic White	% Black	% Asian or Pacific Islander	% Hispanic	% Other or Multi-Racial
Home	35,296	19.5%	8.6%	4.3%	40.9%	26.9%
Residential	3,394	59.5%	13.1%	11.3%	21.5%	3.0%
ILS/SLS	1,823	45.4%	21.7%	2.4%	28.1%	3.1%
Institutions	54	7.4%	18.5%	0.0%	14.8%	59.3%
Med/Rehab/Psych	240	49.6%	16.3%	1.3%	27.5%	4.2%
Other	113	49.6%	17.7%	2.7%	24.8%	5.3%

The Inland Regional Center reports the number of individuals served by type of setting by race or ethnicity. The categories included are Home, Residential, ILS/SLS, Institutions, Med/Rehab/Psych, and Other. The category of Home includes the home of a parent or guardian, a foster home for children, and a family home for adults. The category of Residential includes community care facilities and intermediate care facilities (ICFs) and continuous nursing. The category of ILS/SLS solely includes independent living and supported living. Institutions include developmental centers, state hospitals, and correctional institutions. The category of Med/Rehab/Psych includes skilled nursing facilities, psychiatric treatment facilities, rehabilitation centers, sub-acute care, and community treatment facilities. The Other category includes individuals who are homeless as well as individuals who do not fall into any category (and one individual living outside of California). In general, Home and ILS/SLS settings are the most integrated, and Institutions and Med/Rehab/Psych are the most segregated. Residential settings fall

somewhere in between with community care facilities being more integrated than ICFs within the category. Clearly, homelessness is not consistent with meaningful community integration. The table above reflects the number of individuals with intellectual or developmental disabilities served in each type of setting as well as racial disparities in type of setting. By far, home-based settings are the most common although there is a significant number of persons with developmental disabilities living in congregate residential settings. White people with developmental disabilities are actually more likely to live in these congregate settings than are people of other racial or ethnic groups. At the same time, albeit with a much smaller sample size, White people with developmental disabilities are much less likely to reside in traditional institutions. Given the high number of residents of institutions who are Other or Multi-Racial, that data is ambiguous. Across the board, Hispanic residents appear to be underrepresented in the developmental disability services system.

Psychiatric Disabilities

San Bernardino County Behavioral Health Services is responsible for coordinating the provision of supportive services for persons with psychiatric disabilities in San Bernardino County including the city of Ontario. The agency does not operate any segregated, inpatient facilities.

- b. Describe the range of options for people with disabilities to access affordable housing and supportive services in the jurisdiction and region.*

Ontario's two Section 202 senior housing developments provide affordable housing for elderly persons with disabilities who need supportive services, but there are no other sources of hard units of affordable housing that are specifically targeted at persons with disabilities in Ontario. Specifically, there are no developments with Section 811 Project Rental Assistance or with subsidy through California's Mental Health Services Act (MHSA), the housing program under which is administered locally by San Bernardino County Behavioral Health Services. There are six completed MHSA developments in the county, three of which are restricted to seniors and none of which are located in Ontario. With respect to tenant-based rental assistance for persons with disabilities, the Housing Authority of the County of San Bernardino (HACSB) administers multiple targeted programs in addition to the Housing Choice Voucher program. HACSB provides assistance to 86 households through the Mainstream program, which is limited to households including persons with disabilities; 41 households through the Housing Opportunities for Persons with AIDS (HOPWA) program 367 households through the Veteran's Affairs Supportive Housing program; and 15 households through its MHSA-funded Master Leasing program. For the regular Housing Choice Voucher program, HACSB also incorporates a "Disabled At-Risk" preference when selecting applicants from the waiting list. It is not possible to disaggregate data for these countywide programs by city.

With respect to supportive services, for individuals with developmental disabilities, the Inland Regional Center administers Medicaid-funded Home and Community-Based Services waivers in Ontario and across Riverside and San Bernardino Counties. Currently, there is no waiting list for these services, so, in theory, eligible individuals can access the services needed to sustain community living in a prompt fashion. However, it is important to note that undocumented immigrants are not eligible to participate in federal Medicaid funded services. Although Medi-Cal

has taken steps to cover undocumented youth and pregnant individuals through state funding, the robust supportive services of waiver programs are unavailable to undocumented. This is particularly problematic in Ontario and the broader region, both of which have significant undocumented populations. Rolling Start, Inc. is the center for independent living serving San Bernardino County. It assists with a more limited scope of supportive services needs, specifically around the transition to community living.

With respect to mental health, San Bernardino County Behavioral Health Services operates a range of supportive services programs for youth, adults, and elderly individuals. These programs include, Assertive Community Treatment, the most robust and intensive level of support used to help people with severe and complex needs to sustain community-based living. For Fiscal Year 2016-2017, there were 19,362 adults receiving mental health services through the County. Black residents (18.0%) were somewhat overrepresented among that population while Hispanic residents (32.5%) were somewhat underrepresented.

V. Disparities in Access to Opportunity

a. *To what extent are people with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*

i. Government services and facilities

This Analysis found limited evidence of disparities in access to government services and facilities in Ontario and the broader region. However, in December 2018, the San Bernardino County Sheriff's Department settled a lawsuit that alleged, among other counts, that the Department violated the Americans with Disabilities Act by forcing inmates with disabilities to reside in cells without access to toilets or showers.⁶ The Sheriff's Department is currently in the process of implementing the terms of the settlement and is subject to court oversight in doing so.

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

This Analysis did not reveal current deficiencies in sidewalk accessibility in Ontario or the region.

iii. Transportation

Public transportation is extremely limited in Ontario and the broader region. Although this reality affects all residents, it creates more obstacles for persons with disabilities who are more likely to rely on transit due to either or both the correlation between disability status and socioeconomic status and disabilities that directly affect the ability to drive a private vehicle. This Analysis did not reveal specific

⁶ Beatriz E. Valenzuela, *Settlement Reached in San Bernardino County Jail Class-Action Lawsuit*, THE SUN (Dec. 14, 2018), <https://www.sbsun.com/2018/12/14/settlement-reached-in-san-bernardino-county-jail-class-action-lawsuit/>.

evidence of discrimination by local transit providers, such as Omnitrans, against persons with disabilities.

iv. Proficient schools and educational programs

There are disparities in access to proficient schools and educational programs in Ontario, which is served by the Ontario-Montclair School District and the Chaffey Union Joint High School District. In the former district, the suspension rate for students with disabilities is 4.7% while the rate for students who do not have disabilities is only 2.7%. Both the level of disparity and the volume of suspensions are lower than statewide but are still of concern. In the Chaffey Union Joint High School District, the four-year graduation rate for students with disabilities is 75.1% while the rate for students without disabilities is 91.9%. Additionally, although the State of California Office of Administrative Hearings ultimately held in favor of the Ontario-Montclair School District, in 2017, the district faced an administrative complaint by a parent on behalf of their child alleging that the district had failed to educate the child in the least restrictive environment, a general education classroom.⁷ The student was not integrated into a general education classroom, but the Office of Administrative Hearings upheld the district's decision not to do so.

v. Jobs

Persons with disabilities face severe disparities in access to employment in Ontario and the broader region. The Inland Regional Center reports data on wage and employment indicators for persons with developmental disabilities whom it serves. For the calendar year 2018, just 14% of clients had earned income (as opposed to 16% statewide), and average annual wages were \$9,385 (as opposed to \$10,317 statewide). According to the 2013-2017 American Community Survey,⁸ just 41.0% of adults ages 18 through 64 with disabilities in Ontario were employed as opposed to 72.0% of adults in that age range without disabilities. In the region, the disparity was more extreme with just 31.4% of working-age adults with disabilities employed as opposed to 69.3% of working-age adults without disabilities.

c. *Describe the processes that exist in the jurisdiction and region for people with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

i. Government services and facilities

The City of Ontario does not have prominently featured or easily located information about accessibility included on its website.

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

⁷ <https://www.californiaspeciallaw.com/oah-hearing-decisions/2017050981.pdf>

⁸ The relevant table from the 2014-2018 American Community Survey was not available.

The City of Ontario's website has a user-friendly online form that residents can use to request that the City address certain issues, including with respect to streets and sidewalks, but this portal does not highlight that relevant requests may pertain to accessibility issues.

iii. Transportation

By contrast, Omnitrans' website has clear, easily findable information both about the accessibility of its programs and regarding how to submit a reasonable accommodation request or file a complaint.

iv. Proficient schools and educational programs

The websites for the two principal school districts serving Ontario have dedicated pages on their websites explaining special education offerings and providing information on students' rights. The relevant page on the Ontario-Montclair School District's site is more easily findable than its counterpart on the Chaffey Union Joint High School District's site.

v. Jobs

This Analysis did not reveal information regarding the reasonable accommodation policies and practices of major employers in Ontario and the broader region.

d. Describe any difficulties in achieving homeownership experienced by people with disabilities and by people with different types of disabilities in the jurisdiction and region.

According to HUD 2012-2016 Comprehensive Housing Affordability Study data, in Ontario, 60.7% of households including persons with disabilities are homeowners as opposed to 50.8% of households that do not include persons with disabilities. This counterintuitive finding is likely the result of the fact that elderly persons are both more likely to be homeowners and more likely to have disabilities. This does not mean that younger adults with disabilities do not face significant obstacles to achieving homeownership, potentially including barriers based on their income levels and resulting from discriminatory practices.

5. Disproportionate Housing Needs

- a. *Describe any disproportionate housing needs experienced by people with disabilities and by people with certain types of disabilities in the jurisdiction and region.*

By type of disability, it is clear that persons with disabilities have housing problems at higher rates. For individuals with hearing disabilities, 52.3% have one or more housing problems. 59.3% of persons with ambulatory disabilities have one or more housing problems. 57.4% of persons with cognitive disabilities have one or more housing problems. Lastly 60.4% of persons with self-care disabilities have one or more housing problems. By contrast, a slightly lower 51.6% of households without members with disabilities have one or more housing problems.

6. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting people with disabilities with other protected characteristics.*

This Assessment has made extensive use of local data throughout the Disability and Access section. The sources of data other than HUD-provided data are noted where appropriate.

- b. *The program participant may also describe other information relevant to its assessment of disability and access issues.*

All information relevant to the assessment of disability and access issues is described above as well as in the Contributing Factors Appendix.

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.

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications

- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

E. Fair Housing Enforcement, Outreach Capacity and Resources

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;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- 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;
- 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; or
- Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

There were no unresolved findings, compliance/conciliation/settlement agreements, claims, complaints, or lawsuits regarding fair housing and civil rights laws in the City of Ontario.

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

California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning_
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex, including Gender, Gender Identity, and Gender Expression
- Marital status
- Source of income
- Sexual orientation

- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age
- Genetic information

In addition, FEHA contains similar reasonable accommodations, reasonable modifications, and accessibility provisions as the Federal Fair Housing Amendments Act. FEHA explicitly provides that violations can be proven through evidence of the unjustified disparate impact of challenged actions and inactions and establishes the burden-shifting framework that courts and the Department of Fair Employment and Housing must use in evaluating disparate impact claims.

The Unruh Civil Rights Act provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists “sex, race, color, religion, ancestry, national origin, disability, and medical condition” as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics. In practice, this has meant that the law protects against arbitrary discrimination, including discrimination on the basis of personal appearance.

Furthermore, the Ralph Civil Rights Act (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person’s race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can include: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act may not be imposed for speech alone unless that speech itself threatened violence.

Finally, California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.

In addition to these acts, Government Code Sections 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)
- Housing for extremely low-income households, including single-room occupancy units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

City of Ontario Laws

The City of Ontario's Development Code, Section 4.02.035, Fair Housing and Reasonable Accommodations provides specific procedures for reasonable accommodation through a Fair Housing and Reasonable Accommodation request.⁹

Additional Information

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.*

The Inland Fair Housing and Mediation Board

The Inland Fair Housing and Mediation Board (IFHMB) is a fair housing agency serving the City of Ontario as well as much of the broader region. IFHMB's central office is located in Ontario. IFHMB conducts fair housing counseling, education and enforcement; landlord-tenant housing, ADA transportation, mobile home housing, and ADR court mediation; and first-time homebuyer, default/foreclosure, and reverse-mortgage counseling. The City provides CDBG funding to IFHMB for their fair activities in Ontario.

In addition to IFHMB, the California Apartment Association Greater Inland Empire, the Citrus Valley Association of Realtors, and the Inland Valley Association of Realtors provide training on fair housing issues to their members.

Inland County Legal Services

Inland County Legal Services (ICLS) provides an array of legal services to low-income people in San Bernardino and Riverside Counties. Founded in 1958. ICLS receives funding through the Legal Services Corporation (LSC). ICLS has a housing law program that focuses on increasing and preserving affordable, quality housing. ICLS has a central housing hotline and they provide education, counseling and advice, negotiation, and direct representation to tenants fighting illegal harassment by landlords, challenging unfair termination from programs such as the Housing Choice Voucher program, and getting needed repairs made to their homes.

⁹ https://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/Documents/Planning%20Documents/Development%20Code/Chapter%204%200%20-%20Permits%20Actions%20and%20Decisions_20190702.pdf

ICLS provides pass-through funding to the Inland Empire Latino Lawyers Association (IELLA) and Legal Aid Society of San Bernardino (LAASB). IELLA and LAASB provide free legal services to underserved residents living in Riverside and San Bernardino Counties. IELLA's main focus is family law but they offer legal assistance on landlord/tenant matters, specifically dispute resolution and eviction defense. LAASB has a housing project that assists on landlord/tenant matters.

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 lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, 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.

- Lack of local private fair housing outreach and enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws

V. Fair Housing Goals and Priorities

If implemented, the goals and strategies below will serve as an effective basis for affirmatively furthering fair housing by reducing patterns of segregation, mitigating displacement, addressing disproportionate housing needs, and increasing access to opportunity for members of protected classes.

Goal #1: Increase the supply of affordable housing in high opportunity areas.

Ontario has a significant portion of its residents who are rent-burdened and facing severe housing problems. Additionally, publicly supported affordable housing accounts for slightly under 3% of the total housing stock¹⁰, and Ontario and its environs are experiencing rapidly rising housing costs. Members of protected classes, particularly Hispanic and Black residents, experience these problems most acutely. These indicate a need to expand the supply of affordable housing.

- a. Explore the creation of new funding sources of affordable housing.

The State of California has approved several measures to issue bonds for affordable housing.

- b. Using best practices from other jurisdictions, explore policies and programs that increase the supply affordable housing, such as linkage fees, inclusionary housing, public land set-aside, community land trusts, transit-oriented development, expedited permitting and review, and reduced building permit fees for nonprofit developers.

The above policies and practices have resulted in an increase in affordable housing in jurisdictions throughout the region and in California in particular. There has been an increase in the supply of affordable housing in cities that have adopted these best practices.

- c. Explore opportunities to provide low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 120% of the Area Median Income to develop accessory dwelling units with affordability restriction on their property.

In 2019, the California Legislature passed AB 68 and AB 881 which permit the placement of two accessory dwelling units (ADUs), including one “junior ADU,” on a lot with an existing or proposed single-family home statewide. Due to high construction costs and high demand, the small size of ADUs is not sufficient to ensure that they will be affordable by design. Instead, local governments will need to provide financial assistance in order to incentivize homeowners to make their ADUs affordable. Because it can be difficult for homeowners to access bank financing to build ADUs, there is likely to be demand for such incentives among homeowners. As a condition of receiving assistance, jurisdictions should also require homeowners to attend fair housing training and to maintain records that facilitate audits of their compliance with non-discrimination laws. Individual homeowners who do not have experience as landlords may have less knowledge of the law than established landlords and may also be more likely to act upon their implicit biases in renting units.

¹⁰ See Table 1, Publicly Supported Housing Units by Program Category (1,335/47,423).

- d. Align zoning codes to conform to recent California affordable housing legislation.

California passed several affordable housing bills that became effective on January 1, 2020. Examples include as AB 1763, which expands existing density bonus law for 100% affordable housing projects to include unlimited density around transit hubs with an additional three stories or 33 feet of height, and AB 68, which allows two ADUs on a single lot, as well as multiple ADUs on multifamily lots with limited design requirement that cities can impose and an approval process of 60 days. This and other legislation necessitate changes to Ontario's zoning code.

Goal #2: Increase community integration for persons with disabilities

- a. Prioritize HOME funding for developments that include permanent supportive housing for non-elderly persons with disabilities.

There is a lack of permanent supportive housing for non-elderly persons with disabilities in Ontario. By prioritizing HOME funding for such projects, which should ideally set aside 10-25% of units for persons with disabilities who need supportive services, the City can help make development proposals more competitive for LIHTC and Mental Health Services Act assistance.

Goal #4: Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.

- a. Conduct fair housing training for landlords and tenants on California's Source of Income Discrimination protections to reduce the number of voucher holders turned away.

Although California law provides strong legal tools to combat source of income discrimination, some landlords violate these laws, as they do housing discrimination laws more generally. Targeted education efforts would help to reduce the incidence of unlawful source of income discrimination. Attendees at community stakeholder meetings were unaware that landlords are required to accept vouchers and third-party checks and would benefit from fair housing education.

VI. CONTRIBUTING FACTORS APPENDIX

Access for Students with Disabilities to Proficient Schools

Access for students with disabilities to proficient schools may be a significant contributing factor to fair housing issues. As discussed in the Disability and Access section of this Analysis, students with disabilities in the school districts serving Ontario are suspended at higher rates than their peers and graduate high school at lower rates than their peers. This Analysis identified one report of a local school district allegedly failing to educate a student with a disability in the least restrictive environment though that complaint did not result in a finding of discrimination.

Access to Transportation for Persons with Disabilities

Access to transportation for persons with disabilities may be a contributing factor to fair housing issues in Ontario. The main barrier to transportation for persons with disabilities in Ontario is the lack of public transportation infrastructure generally, including long wait times for buses. Because many persons with disabilities are dependent on public transportation, these problems hit persons with disabilities especially hard. Omnitrans provides Access Service for persons with disabilities who are unable to independently use the fixed route bus service. The Access service area is up to 3/4 mile on either side of an existing bus route, thereby encompassing all assisted and senior housing facilities in Ontario. All buses are equipped with wheelchair accessible ramps or lifts and securement, low floor kneeling buses; audio and visual on-board bus stop announcements, and TDD/TTY access via the California Relay Service, 711.

Access to Financial Services

Access to financial services may be a contributing factor to fair housing issues for residents of Ontario. There appear to be numerous banks and credit unions in Ontario, mainly in the commercial district on Grove Avenue and East Guasti Road north of the airport. However, there are also a plethora of payday lenders located in or near the R/ECAPs in Ontario. A 2016 report from the California Department of Business Oversight noted that, while 38.7% of California's population was Hispanic, the average percentage of Hispanic residents in zip codes with six or more storefront payday lenders was 53%.¹¹ Payday loans often lead to a cycle of debt that impedes individuals' access to opportunity and economic mobility more generally. In Ontario and the region, that phenomenon appears to be especially likely to harm Hispanic residents.

Access to Publicly Supported Housing for Persons with Disabilities

Access to publicly supported housing for persons with disabilities may be a significant contributing factor to fair housing issues in Ontario and the region. Persons with disabilities are generally able to access Housing Choice Vouchers at rates that are commensurate with their share of the income-eligible population; however, other types of publicly supported housing in Ontario almost exclusively serve seniors, leaving limited options for non-elderly persons with disabilities. This analysis does not include privately-owned deed-restricted affordable housing units. Available data shows that persons with disabilities make up disproportionately small shares of Project-Based Section 8 and Other Multifamily (in the case of Ontario, Section 202) housing although it appears

¹¹ *The Demographics of California Payday Lending: A Zip Code Analysis of Storefront Locations*, CALIFORNIA DEPARTMENT OF BUSINESS OVERSIGHT (2016), <https://dbo.ca.gov/wp-content/uploads/sites/296/2019/02/The-Demographics-of-CA-Payday-Lending-A-Zip-Code-Analysis-of-Storefront-Locations.pdf>.

likely that housing providers reporting data to HUD are not recording the disability status of elderly residents, many of whom have disabilities.

Admissions and Occupancy Policies and Procedures, Including Preferences in Publicly Supported Housing

Admissions and occupancy policies and procedures, including preferences in publicly supported housing may be a significant contributing factor to fair housing issues in Ontario. The Housing Authority of the County of San Bernardino (HACSB) has a criminal background screening policy that might be overly restrictive. For example, the Housing Authority considers any criminal activity that occurred as long as seven years ago, even misdemeanors.¹² In addition, the Housing Authority also considers pending criminal charges even if there was no conviction. Moreover, the predominance of publicly supported housing for seniors in Ontario limits housing choice for families. This analysis does not include other locally administered rental assistance programs.

Availability of Affordable Units in a Range of Sizes

The availability of affordable units in a range of sizes may be a significant contributing factor to fair housing issues in Ontario. Overcrowding Ontario and the region is very high; over 15% of Hispanic households experience overcrowding. There are only 80 hard units of publicly supported housing with two or more bedrooms and no public housing units in Ontario. This analysis does not include privately-owned deed-restricted affordable housing units.

Availability, Type, Frequency, and Reliability of Public Transportation

The availability, type, frequency, and reliability of public transportation may be contributing factors to fair housing issues in Ontario. Like most other Southern California jurisdictions, the vast majority of Ontario residents drive to work and only a small portion take public transportation. The City of Ontario is part of a regional transportation system which includes bus, curb-to-curb Access, and rail systems. Ontario is also serviced by Metrolink, the Southern California rail system. The Ontario East station lies on the Riverside line, providing direct access to Los Angeles Union Station to the West and Downtown Riverside to the East. During community meetings, none of the stakeholder found transportation to be excellent. Problems expressed included the long waiting times for buses, difficulty getting on buses with strollers and packages, the lack of enforcement of handicapped-only seating, and unsafe conditions at bus shelters.

Community Opposition

Community Opposition may be a contributing factor to fair housing issues in Ontario and the region. According to a recent report by the UC Riverside School of Business, Center for Economic Forecasting and Development on Southern California's progress under the state's Regional Housing Needs Assessment (RHNA), the fundamental obstacle to achieving mandated housing goals include considerable local opposition to development.¹³ In addition, state and regional landlord associations such as the California Apartment Association, the California Landlord

¹² Administrative Plan, Housing Authority of the County of San Bernardino, page 3-9.

<http://ww2.hacsb.com/files/pdf/hcv/admin-plan-november-2018.pdf>

¹³ UC Riverside School of Business Center for Economic Forecasting and Development, *California's Housing Crisis: Goals and Production in Southern California*, April 2019.

https://ucreeconomicforecast.org/wp-content/uploads/2019/04/SCAG_Housing_White_Paper_Digital_4_11_2019.pdf

Association, and the Apartment Owners Association of California have organized to oppose rent control and anti-eviction legislation.

Deteriorated and Abandoned Properties

Deteriorated and abandoned properties is a significant contributing factor to fair housing issues in Ontario. Ontario experienced a surge in deteriorated and abandoned properties in the wake of the foreclosure crisis. Although the number of foreclosures in Ontario has gradually abated over the ensuing years, there are 812 vacant housing units that is categorized as “Other Vacant” in the American Community Survey. These are the vacant units that are most likely to be abandoned rather than capturing vacation rentals and units that are currently on the rental or sales market. Additionally, in Ontario more than one-third of Hispanic and Black households have severe housing problems. has higher rates than the region in the severe housing problems category. 31.28% of households have four or more severe housing problems compared to 26.37%.

Displacement and Lack of Housing Support for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

Displacement and lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking are not significant contributing factors to fair housing issues in Ontario. California state law protects victims of domestic violence, sexual assault, stalking, human trafficking, or abused elder or dependent adult who terminates their lease early.¹⁴ The tenant must provide written notice to the landlord, along with a copy of a temporary restraining order, emergency protective order, or protective order that protects the household member from further domestic violence, sexual assault, stalking, human trafficking, or abuse of an elder or dependent adult. Alternatively, proof may be shown by submitting a copy of a written report by a peace officer stating that the victim has filed an official report, or documentation from a qualified third party acting in their professional capacity to indicate the resident is seeking assistance for physical or mental injuries or abuse stemming from the abuse at issue. Notice to terminate the tenancy must be given within 180 days of the issuance date of the qualifying order or within 180 days of the date that any qualifying written report is made. This analysis did not reveal specific evidence of noncompliance with these requirements in Ontario or of other barriers faced by domestic violence survivors.

Displacement of Residents Due to Economic Pressures

Displacement of residents due to economic pressures may be a significant contributing factor to fair housing issues in Ontario. The map below from the Urban Displacement Project at the University of California Berkeley shows census tracts that experienced gentrification both between 1990 and 2000 and between 2000 and 2015 (in red), census tracts that experienced gentrification between 2000 and 2015 (in light blue), census tracts that experienced gentrification between 1990 and 2000 (in dark blue), and disadvantaged communities that have not gentrified (in tan). Though the Urban Displacement Project does not map the risk of future gentrification in displacement in Southern California, the areas most vulnerable to gentrification and displacement in the future are disadvantaged areas located near areas that have already gentrified and disadvantaged areas

¹⁴

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CIV§ionNum=1946.7

located near major transit assets as well as anchors such as airports, hospitals, and universities. This seems to suggest that in Ontario, with its concentration of Hispanic residents, may be subject to future displacement.



Impediments to Mobility

Impediments to mobility are a significant contributing factor to segregation and disparities in access to opportunity and segregation in Ontario and the region. Although the Housing Authority of San Bernardino County does not appear to have restrictions on portability that are more onerous than those established by HUD regulation, the Housing Authority has not voluntarily adopted Small Area Fair Market Rents. As a result, the purchasing of Housing Choice Vouchers, disproportionately utilized by people of color and persons with disabilities, is often inadequate to facilitate moves to predominantly white high-opportunity areas. The inadequacy of payment standards is a consistent problem across housing authorities in Southern California. However, as a Move-To-Work agency, the Housing Authority has established regional Fair Market Rents based on submarkets to allow more availability in higher market areas.

Inaccessible Government Facilities or Services

Inaccessible government facilities or services are not a significant contributing factor to fair housing issues in Ontario. This Analysis did not reveal examples of government facilities or services in Ontario that are inaccessible.

Inaccessible Public or Private Infrastructure

Inaccessible public or private infrastructure is not a significant contributing factor to fair housing issues in Ontario. This Analysis did not reveal examples of public or private infrastructure in Ontario that is inaccessible.

Lack of Access to Opportunity Due to High Housing Costs

Lack of access to opportunity due to high housing costs may be a significant contributing factor in Ontario and throughout Southern California. The Disparities in Access to Opportunity section found that educational, transportation, and economic opportunities are generally even among racial and ethnic categories; environmental opportunity is lower across all categories when compared to the region. However, high housing costs have resulted in displacement of residents to jurisdictions north and east of Ontario where there are more affordable housing options.

Lack of Affordable, Accessible Housing in a Range of Unit Sizes

Lack of affordable, accessible housing in a range of unit sizes may be a significant contributing factor to fair housing issues in Ontario. As discussed in connection with several other contributing factors, there is a general shortage of affordable housing throughout the region. This is exacerbated by the fact that, as discussed in relation to the availability of affordable units in a range of sizes, the majority of publicly supported housing units are reserved for seniors and there is no public housing units. Low-income households are dependent upon the Housing Choice Voucher program to access housing. However, unlike with Project-Based Section 8 units, for example, there is no requirement that privately owned and managed units that tenants use vouchers to rent meet the heightened accessibility requirements of Section 504 of the Rehabilitation Act. This shortage has a particular effect on low-income families in which at least one member has a disability that requires accessibility features, and persons with disabilities who require the services of live-in aides.

Lack of Affordable In-Home or Community-Based Supportive Services

Lack of affordable in-home or community-based supportive services may be a significant contributing factor to fair housing issues in Ontario. Although robust home and community-based services are available through Medicaid-funded programs, across types of disabilities, undocumented adults face barriers due to federal restrictions of Medicaid assistance for undocumented people. The California Legislature has and approved state funding for Medi-Cal services for undocumented people until they reach the age of 26, a critical investment that exceeds that of any other state, but there remains a funding gap for services for most undocumented adults.

Lack of Affordable, Integrated Housing for Individuals Who Need Supportive Services

Lack of affordable, integrated housing for individuals who need supportive services may be a significant contributing factor to fair housing issues in Ontario. This is a significant contributing factor for two reasons. First, the shortage of permanent supportive housing throughout Ontario in comparison to the total need is characteristic of the broader shortage of affordable housing generally. Second, although there are some programs that specifically focus on providing permanent supportive housing to individuals with disabilities including developments built with Mental Health Services Act funds and Mainstream Housing Choice Vouchers in San Bernardino County (though not in Ontario), there has not been a concerted effort to raise local bond funds for affordable housing and then to prioritize permanent supportive housing with a portion of bond proceeds like there has been in some other California jurisdictions, including Los Angeles County and Santa Clara County.

Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing

Lack of assistance for transitioning from institutional settings to integrated housing is not a significant contributing factor to fair housing issues in Ontario. Rolling Start, Inc. provides robust services to individuals transitioning from institutional settings to integrated housing, and there is no indication that they are unable to meet the total need for such services.

Lack of Community Revitalization Strategies

Lack of community revitalization strategies may be a significant contributing factor to fair housing issues in Ontario. Ontario has a disproportionately high number of low-income Hispanic residents in comparison with the region. There are several new developments planned in Ontario, including

workforce attainable housing in the downtown area that will also feature a business technology incubator. There is a risk of displacement that would prevent long-time residents from benefiting from this revitalization. To mitigate this risk, the City has adopted anti-displacement strategies that include preferences for current Ontario residents and employees at two of the new affordable housing developments in downtown Ontario.

Lack of Local or Regional Cooperation

Lack of local or regional cooperation may be a significant contributing factor to fair housing issues in Ontario. Although Ontario's contribution towards meeting the affordable housing needs of the region is significant, multiple jurisdictions in the region fail to meet the required Regional Housing Needs Assessment. In addition, although Ontario's zoning and land use policies provide opportunities for multifamily affordable housing developments, other jurisdictions' policies reflect a lack of commitment to a regional approach to promoting integration and access to opportunity. The inaction of these municipalities, which could be remedied through a more regional approach to meeting housing and service needs, puts a disproportionate burden on Ontario.

Lack of Local Private Fair Housing Outreach and Enforcement

Lack of local private fair housing outreach and enforcement may be a significant contributing factor to fair housing issues in Ontario. Ontario is served by Inland Fair Housing and Mediation Board (IFHMB), a high-quality private non-profit fair housing organization and they receive funding support through the City. However, IFHMB are underfunded and understaffed in comparison to the total need for their services.

Lack of Local Public Fair Housing Enforcement

Lack of local public fair housing enforcement is not a contributing factor to fair housing issues in Ontario. The California Department of Fair Employment and Housing is the enforcement mechanism for fair housing claims. While the Department is large and well-funded, they do operate across the very large state and the nearest office to Ontario is in downtown Los Angeles. Given that administrative processes can take a very long time, additional enforcement power provided by the Ontario government could assist residents with faster and more localized enforcement options.

Lack of Meaningful Language Access for Individuals with Limited English Proficiency

Lack of meaningful language access for individuals with limited English proficiency may be a significant contributing factor to fair housing issues in Ontario. Private landlords generally are not required to provide leases or other key documents or communications in the primary languages of individuals with limited English proficiency (LEP). This can create confusion about individuals' rights. In addition, the City of Ontario's website does not provide information in Spanish despite more than 70 per cent of the population being Hispanic.

Lack of Private Investment in Specific Neighborhoods

Lack of private investment in specific neighborhoods may be a significant contributing factor to fair housing issues in Ontario. There are neighborhoods, particularly disproportionately low-income, predominantly Hispanic neighborhoods, that have historically been subject to disinvestment by the private sector. However, in recent years Ontario has begun to see an uptick in additional private investment.

Lack of Public Investment in Specific Neighborhoods

Lack of public investment in specific neighborhoods is not a significant contributing factor to fair housing issues in Ontario. This analysis did not reveal evidence of disparities in public infrastructure between areas that are in R/ECAPs and those that are not.

Lack of Resources for Fair Housing Agencies and Organizations

Lack of resources for fair housing agencies and organizations may be a significant contributing factor to fair housing issues in Ontario. IFHMB provides enforcement, outreach, and education to residents of Ontario and the surrounding region. However, the size of the federal Fair Housing Initiatives Program, the primary funding program for fair housing organizations, has failed to keep up with inflation, making Congress's appropriations worth less over time. In order to meet the needs of residents of a large and diverse region, greater levels of resources are required.

Lack of State or Local Fair Housing Laws

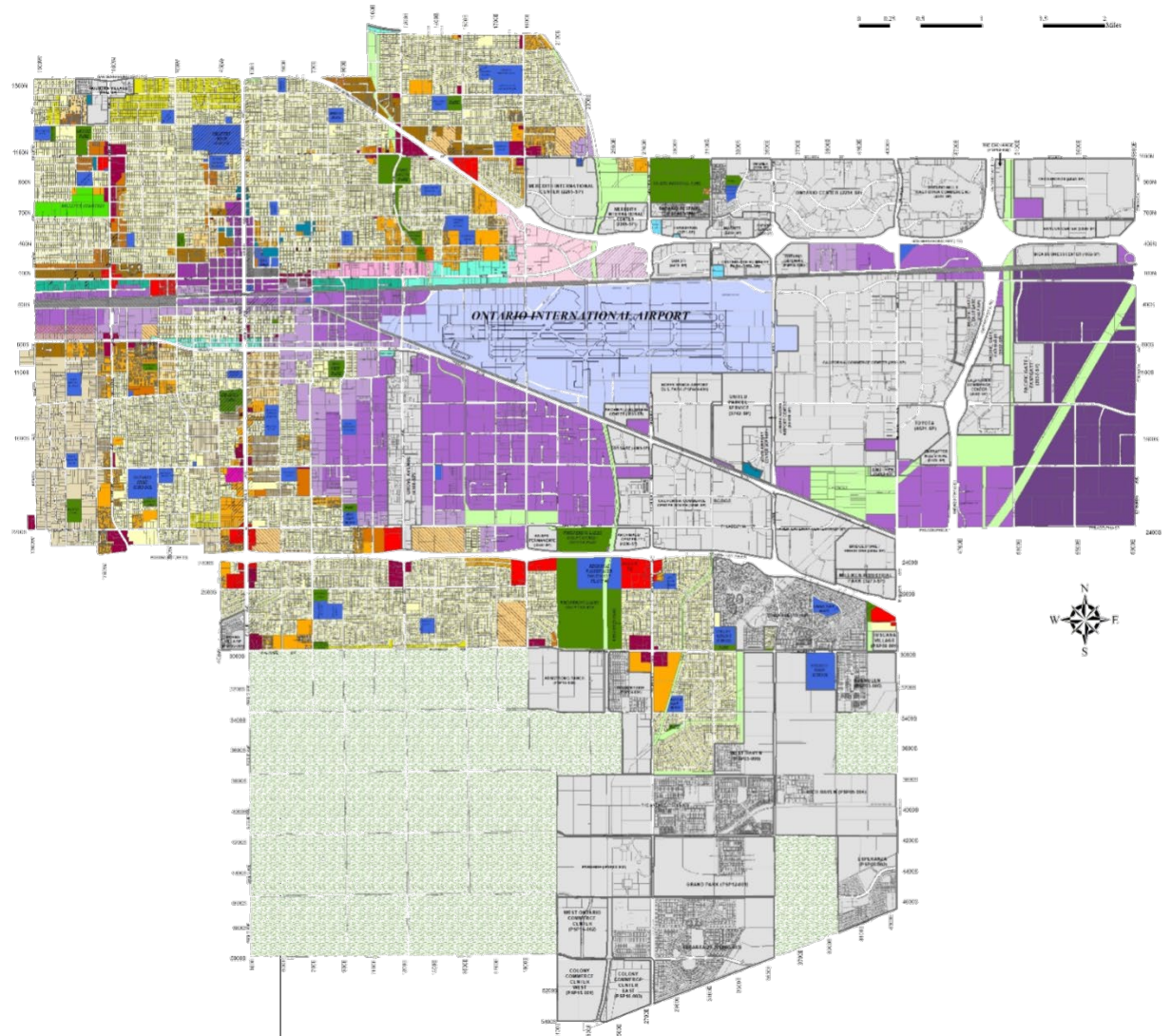
Lack of state or local fair housing laws is not a contributing factor to fair housing issues in Ontario. The state of California has robust anti-discrimination provisions in both the Fair Employment and Housing Act, The Unruh Civil Rights Act, The Ralph Civil Rights Act and The Bane Civil Rights Act. In addition, the California Legislature recently passed SB 222 and SB 329, banning the practice of discrimination against voucher holders statewide. Despite the fact that Ontario does not have its own specific anti-discrimination provisions other than those for reasonable accommodations, these strong statewide laws ensure that there are not significant gaps in non-discrimination protections for residents of Ontario. If Ontario enacted local protections, however, it may be able to qualify as a Fair Housing Assistance Program agency and receive federal funds for processing and investigating discrimination complaints.

Land Use and Zoning Laws

Land use and zoning laws are not a significant contributing factor to fair housing issues in Ontario. Ontario's zoning code has a range of zoning that permits multifamily developments in many parts of the city. Ontario has fewer single-family homes than in the region and fewer large apartment buildings. There is a preponderance of buildings with two to nine units and a low proportion of land reserved solely for single family developments. See zoning map below.

ZONING MAP

0 0.25 0.5 1 1.5 2 Miles



Lending Discrimination

Lending discrimination may be a contributing factor to fair housing issues in Ontario. Given the scarcity of affordable rental housing and high cost of living within Ontario, loan opportunities for home improvement, purchase, and refinancing are important tools for moderate and low-income households. Using Home Mortgage Disclosure Act (HMDA) data, white residents are most likely to have their loan applications result in originated loans, Blacks are least likely, and Hispanics fall between the two groups. Hispanic borrowers are most likely to receive a high-priced loan followed by Black borrowers, while white and Asian borrowers are least likely to be given a high cost loan. The data is similar for the region.

Location and Type of Affordable Housing

The location and type of affordable housing may be a contributing factor to fair housing issues in Ontario. The location of affordable housing is concentrated near or surrounding R/ECAPs, but also near public transportation.

Location of Accessible Housing

The location of accessible housing may be a significant contributing factor to fair housing issues in Ontario. The location of accessible housing tends to track areas where there are concentrations of publicly supported housing. Publicly supported housing in Ontario is concentrated near or in R/ECAPs whereas LIHTC developments are more scattered across the city. Overall, siting more publicly supported housing in higher-income communities with access to proficient schools would help ensure that persons with disabilities who need accessibility features in their homes have a full range of neighborhood choices available to them. This analysis does not include privately-owned deed-restricted affordable housing units.

Location of Employers

The location of employers is not a significant contributing factor to fair housing issues in Ontario. Ontario residents in general, the majority of whom are Hispanic, have greater access to job centers than do predominantly white communities in the region due to the routing of transportation and logistics jobs located near the airport and the location of a Metrolink that links Ontario to Los Angeles.

Location of Environmental Health Hazards

The location of environmental health hazards may be a contributing factor to fair housing issues in Ontario and the region. The environmental health hazard exposure index summarizes potential exposure to harmful toxins including carcinogenic, respiratory, and neurological hazards. Values are percentile ranked and range from 0 to 100, with higher values corresponding to less exposure to harmful toxins. Data is computed for U.S. counties by applying summary statistics across all census tracts present in a county and is current as of 2015. San Bernardino County has an exposure index of 21 out of a maximum of 99, which is low.¹⁵ However, the entire Southern California region suffers from poor environmental health hazard exposures. The highest in the broader region

¹⁵

https://www.opendatanetwork.com/entity/05000000US06071/San_Bernardino_County_CA/health.environmental_health.env-health-idx-median?year=2015

is Palm Springs at 39; the lowest is Los Angeles at 6. There are no Superfund sites located in the region.

Location of Proficient Schools and School Assignment Policies

The location of proficient schools and school assignment policies may be significant contributing factors to fair housing issues in Ontario. The schools with the highest proficiency in western San Bernardino County are generally located further north in the foothills of the San Gabriel Mountains. This distribution of proficient schools maps on to patterns of residential racial and ethnic segregation, with disproportionately White population in areas with high performing schools and relatively low Hispanic population in those areas. District boundaries frequently map onto municipal boundaries, which in turn correlate to patterns of segregation. Inter-district transfers are only available for extremely limited circumstances. This Analysis did not reveal school assignment policies that contribute to segregation within individual school districts.

Loss of Affordable Housing

The loss of affordable housing may be a significant contributing factor to fair housing issues in Ontario. When subsidy contracts expire, the housing providers that often have the least economic incentive to renew their affordability restrictions are those that are located in higher opportunity areas or in areas that are gentrifying or at risk of gentrification. In Ontario, Dale Apartments, a 74-unit apartment building funded through LIHTC, has reverted to market-rate housing after the affordability restrictions expired. The loss of other developments could contribute to segregation and fuel displacement.

Occupancy Codes and Restrictions

Occupancy codes and restrictions are not contributing factor to fair housing issues in Ontario. The City of Ontario deems all residential care facilities or group homes with six or fewer residents to constitute single-family residences, thus allowing the operation of such facilities in residential districts. Additionally, the zoning code's definition of a "family" is written in a manner that does not arbitrarily limit households to related persons. So long as a residential care facility has six or fewer residents, it is clear that those obstacles do not apply

Outstanding Violations of Fair Housing or Other Civil Rights Law

Outstanding violations of fair housing or other civil rights law are not a contributing factor to fair housing issues in Ontario. The City does not have any pending allegations of civil rights or fair housing violations, nor is it currently under any sort of investigation, consent agreement, or compliance agreement with Department of Justice.

Private Discrimination

Private discrimination may be a significant contributing factor to fair housing issues in Ontario. Between 2018-2019, there were approximately 180 incidents of discrimination that were investigated by the IFHMB. In addition, stakeholders reported the persistent nature of housing discrimination.

Quality of Affordable Housing Information Programs

The quality of affordable housing information programs may be a significant contributing factor to fair housing issues in Ontario. The Housing Authority of the County of San Bernardino does not operate a mobility counseling program. Mobility counseling programs help inform voucher holders of opportunities to use their assistance in higher opportunity areas, assist with applying for units in higher opportunity areas, and provide support in adjusting to life in different neighborhoods have demonstrated effectiveness in helping voucher holders make moves that foster integration.¹⁶ The lack of mobility counseling is not the only barrier to voucher holders accessing higher opportunity areas, but, as the discussion of impediments to mobility reveals, there may be some rental units available within housing authority payment standards in higher opportunity areas, but the availability would be greater if the Housing Authority implemented Small Area Fair Market Rents. Although the Housing Authority, as a Move-To-Work agency, has adopted regional Fair Market Rents based on submarket regions within San Bernardino County.

Regulatory Barriers to Providing Housing and Supportive Services for Persons with Disabilities

Regulatory barriers to providing housing and supportive services for persons with disabilities is not a significant contributing factor to fair housing issues for persons with disabilities in Ontario. The amount of affordable housing available (and its cost), the extent of outreach and capacity among service providers, and the scope of service provision may be the major causes of segregation for persons with disabilities. To the extent that barriers are regulatory in nature, they typically overlap with the zoning and land use barriers to the construction of affordable housing. This Analysis discusses those in detail in the analysis of the land use and zoning laws contributing factor. This Analysis also discusses restrictions on group homes in connection with the occupancy codes and restrictions contributing factor.

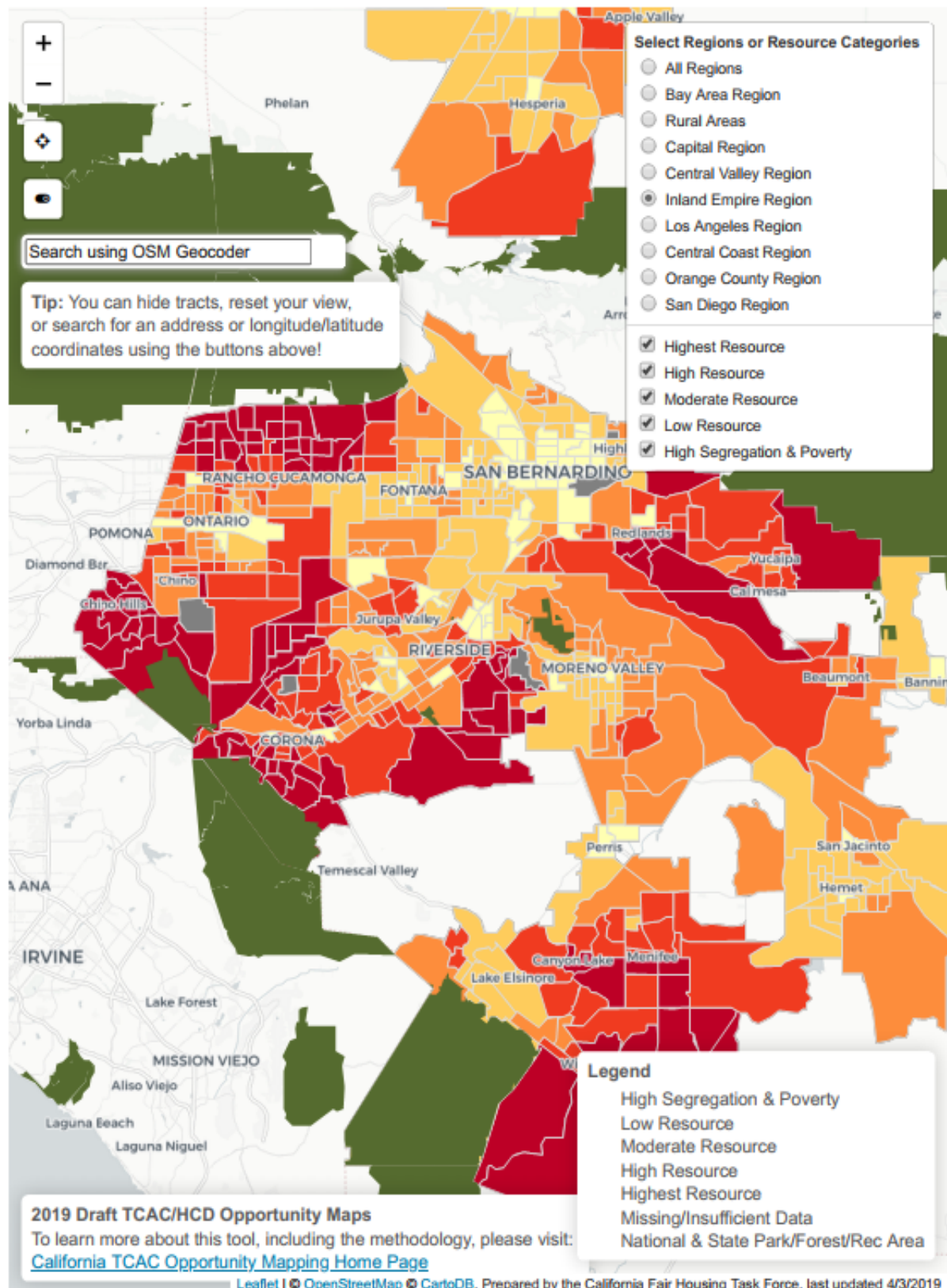
Siting Selection Policies, Practices, and Decisions for Publicly Supported Housing, Including Discretionary Aspects of Qualified Allocation Plans and Other Programs

Siting selection policies, practices, and decisions for public supported housing, including discretionary aspects of Qualified Allocation Plans and other programs is not a significant contributing factor to fair housing issues. The California Tax Credit Allocation Committee's (CTAC's) Qualified Allocation Plan (QAP) incentivizes family-occupancy Low Income Housing Tax Credit (LIHTC) development in what it terms "High Resource" or "Highest Resource" areas. As the maps below illustrate, these areas are generally high opportunity areas that are disproportionately white. LIHTC development in these areas would contribute to greater residential racial integration. Developers have reported that the incentives to build affordable housing in these areas may not be sufficient to overcome differences in land costs between higher opportunity areas and historically disinvested areas. Nonetheless, in light of the incentives for LIHTC development in High Resource and Highest Resource areas, the QAP does not currently contribute to segregation. The first map is the current CTCAC Opportunity Map, which categorized Ontario as a high segregation and poverty area. The second map is the proposed 2020 Opportunity Map, which categorizes Ontario as a community with low resources but not one of high segregation and poverty.

¹⁶ Mary K. Cunningham et al., *Moving to Better Neighborhoods with Mobility Counseling*, URBAN INSTITUTE (Mar. 2005), <https://www.urban.org/sites/default/files/publication/51506/311146-Moving-to-Better-Neighborhoods-with-Mobility-Counseling.PDF>.

5/13/2020

TCAC Opportunity Map

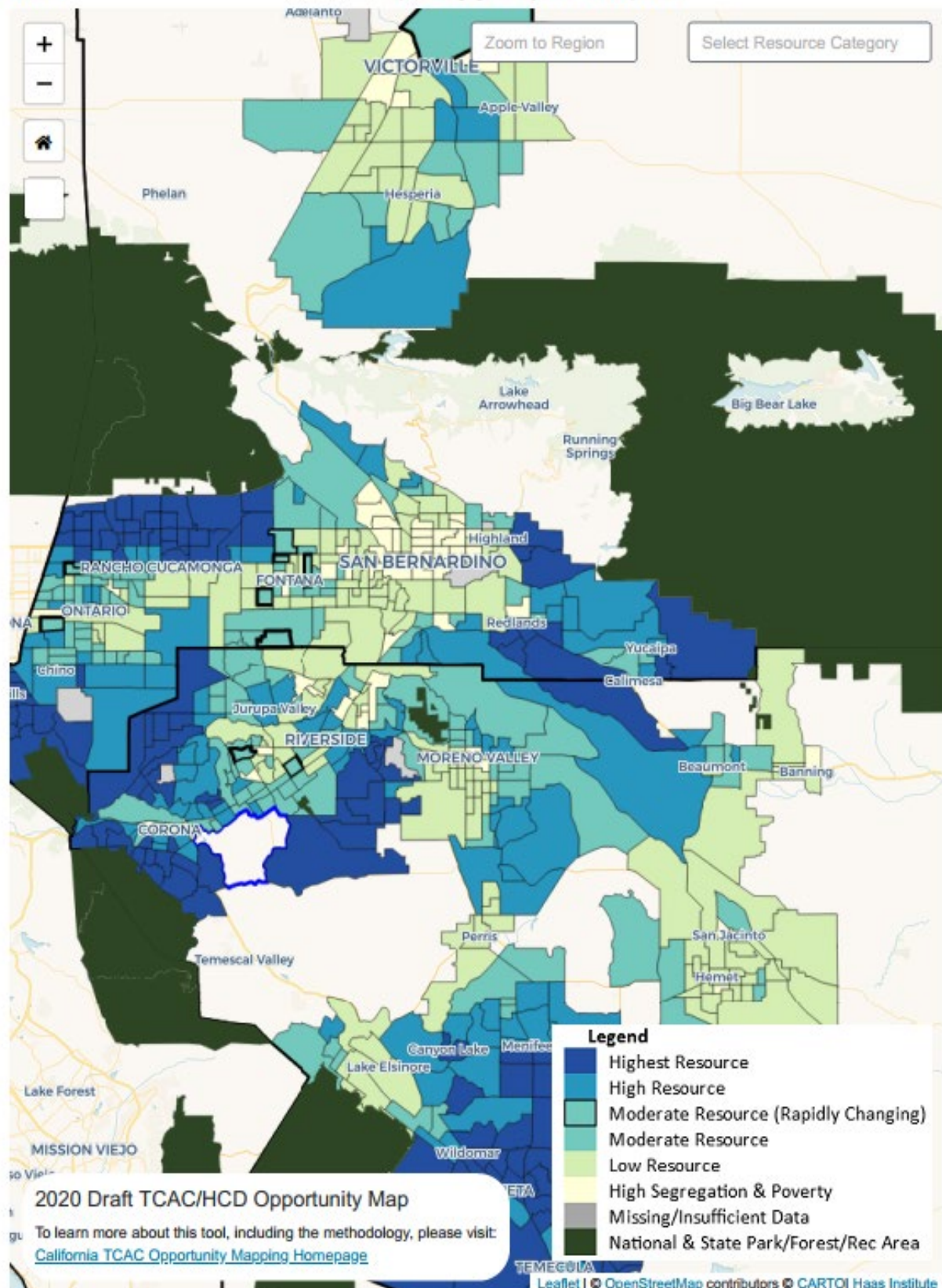


https://haasinstitute.berkeley.edu/sites/default/files/mappings/TCAC/opportunity_map_2019.html

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<https://belonging.berkeley.edu/tcac-2020-preview>



<https://belonging.berkeley.edu/tcac-2020-preview>

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Source of Income Discrimination

Source of income discrimination may be a significant contributing factor to fair housing issues in Ontario. In October of 2019, Governor Newsom signed into law SB 329, which prohibits discrimination in housing based on use of a Housing Choice Voucher or other tenant-based rental assistance. Previously, no protections for voucher holders had existed in Ontario and the region. As the source of income discrimination law has just been passed, it is difficult to say whether (now) illegal discrimination will continue in Ontario, although stakeholders raised this issue recently at community meetings. A comprehensive landlord education campaign could help avert this, as well as comprehensive voucher counseling to help voucher holders navigate the real estate market.

State of Local Laws, Policies, or Practices That Discourage Individuals with Disabilities from Living in Apartments, Family Homes, Supportive Housing, and Other Integrated Settings

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, and other integrated settings are not a significant contributing factor to fair housing issues in Ontario. A severe shortage of available, integrated affordable housing is the primary driver of the segregation of persons with disabilities, rather than laws, policies, or practices that discourage persons with disabilities from living in integrated housing. This Analysis discusses restrictions on group homes and community residences in connection with the occupancy codes and restrictions contributing factor.

Unresolved Violations of Fair Housing or Civil Rights Law

Unresolved violations of fair housing or civil rights law are not a significant contributing factor to fair housing issues in Ontario. This Analysis did not find any unresolved violations or lawsuits related to fair housing issues.