







188	Closed Ssk	6/13/2013 0:00	379000	379000	365000	21475290	48600	92253	1706	213.95	2006	2333	5/10/2013 0:00	6/3/2013 0:00	6/13/2013 0:00
189	Closed Ssk	6/27/2013 0:00	399000	379000	365000	2147872	45220	92210	2208	205.52	1989	4856	3/28/2013 0:00	6/24/2013 0:00	6/27/2013 0:00
190	Closed Ssk	6/26/2013 0:00	489000	389000	365000	21446462	45790	92210	3776	205.52	1985	2178	1/4/2012 0:00	6/17/2013 0:00	6/26/2013 0:00
191	Closed Ssk	8/15/2013 0:00	379000	369000	369000	136650515	75213	92210	2399	153.81	1979	4856	4/14/2013 0:00	7/8/2013 0:00	8/15/2013 0:00
192	Closed Ssk	6/12/2013 0:00	389000	389000	370000	21473038	56242	92253	2772	162.85	1988	3049	3/26/2013 0:00	6/12/2013 0:00	6/12/2013 0:00
193	Closed Ssk	7/16/2013 0:00	489000	399000	370000	21448900	55179	92253	2596	142.53	1989	3049	2/28/2012 0:00	7/15/2013 0:00	7/16/2013 0:00
194	Closed Ssk	7/16/2013 0:00	399000	399000	370000	21475228	80090	92253	1706	219.81	1992	4782	5/13/2013 0:00	6/23/2013 0:00	7/16/2013 0:00
195	Closed Ssk	7/2/2013 0:00	410000	410000	370000	21473599	55336	92253	2026	186.57	2000	2614	4/11/2013 0:00	6/4/2013 0:00	7/2/2013 0:00
196	Closed Ssk	6/4/2013 0:00	389000	389000	380000	21475197	54744	92253	1627	233.56	1990	1742	5/7/2013 0:00	6/19/2013 0:00	6/4/2013 0:00
197	Closed Ssk	6/4/2013 0:00	420000	385000	385000	21470906	78055	92253	2020	190.59	1968	2614	2/14/2013 0:00	5/4/2013 0:00	6/4/2013 0:00
198	Closed Ssk	8/2/2013 0:00	429000	399900	399900	21464356	54314	92253	2272	169.45	1989	3049	10/27/2012 0:00	5/17/2013 0:00	8/2/2013 0:00
199	Closed Ssk	6/28/2013 0:00	395000	395000	395000	21472037	54762	92253	2596	148.31	1989	3049	3/7/2013 0:00	7/4/2013 0:00	6/28/2013 0:00
200	Closed Ssk	6/28/2013 0:00	449500	414900	395000	21472771	78575	92253	2072	190.64	1988	3049	3/7/2013 0:00	6/28/2013 0:00	6/28/2013 0:00
201	Closed Ssk	6/28/2013 0:00	399000	399000	399000	21467798	54785	92253	2472	160.8	1988	3049	3/7/2013 0:00	6/28/2013 0:00	6/28/2013 0:00
202	Closed Ssk	6/28/2013 0:00	399000	399000	399000	21475620	56668	92253	2596	153.7	1985	3049	5/17/2013 0:00	5/30/2013 0:00	6/28/2013 0:00
203	Closed Ssk	8/2/2013 0:00	412600	412600	412000	21476654	45908	92210	2399	171.74	1979	4856	6/4/2013 0:00	6/4/2013 0:00	8/2/2013 0:00
204	Closed Ssk	8/9/2013 0:00	429000	429000	418000	SW13095752	38211	92562	2400	174.17	1985	2614	5/18/2013 0:00	7/2/2013 0:00	8/9/2013 0:00
205	Closed Ssk	6/20/2013 0:00	489000	439000	418000	21474768	80552	92253	2272	185.65	1986	3049	5/7/2013 0:00	7/2/2013 0:00	8/9/2013 0:00
206	Closed Ssk	7/19/2013 0:00	425000	425000	425000	SW13059823	22106	92587	1532	339.46	1974	1307	4/4/2013 0:00	6/19/2013 0:00	7/19/2013 0:00
207	Closed Ssk	8/2/2013 0:00	450000	450000	425000	21463986	54691	92210	2529	168.05	1979	4782	10/9/2012 0:00	5/31/2013 0:00	8/2/2013 0:00
208	Closed Ssk	6/25/2013 0:00	400000	425000	425000	21468289	45423	92210	2529	168.05	1979	4782	10/9/2012 0:00	6/19/2013 0:00	6/25/2013 0:00
209	Closed Ssk	7/23/2013 0:00	473000	473000	445000	21470288	50018	92210	2529	168.05	1979	4782	10/9/2012 0:00	6/19/2013 0:00	7/23/2013 0:00
210	Closed Ssk	7/23/2013 0:00	473000	473000	445000	21468738	77327	92253	1922	284.13	1986	2614	2/13/2013 0:00	8/20/2013 0:00	8/2/2013 0:00
211	Closed Ssk	8/21/2013 0:00	519000	495000	450000	21468738	77327	92253	1922	284.13	1986	2614	2/13/2013 0:00	8/20/2013 0:00	8/2/2013 0:00
212	Closed Ssk	8/21/2013 0:00	489000	489000	450000	21470943	76880	92253	1981	233.04	1986	2614	2/13/2013 0:00	8/20/2013 0:00	8/2/2013 0:00
213	Closed Ssk	6/16/2013 0:00	489000	489000	450000	21476043	49820	92253	2690	171.7	1973	3920	5/24/2013 0:00	6/12/2013 0:00	7/26/2013 0:00
214	Closed Ssk	6/16/2013 0:00	489000	489000	450000	21468915	76950	92210	2592	192.31	1972	4856	1/29/2013 0:00	6/17/2013 0:00	6/16/2013 0:00
215	Closed Ssk	6/16/2013 0:00	479000	479000	470000	OCL3021001	46421	92253	3081	195.06	2006	1881	2/26/2013 0:00	7/2/2013 0:00	6/16/2013 0:00
216	Closed Ssk	7/3/2013 0:00	570000	570000	490000	21475729	56155	92253	3081	195.06	2006	1881	2/26/2013 0:00	7/2/2013 0:00	7/3/2013 0:00
217	Closed Ssk	7/3/2013 0:00	570000	570000	490000	21474668	48170	92253	2138	259.19	2000	2178	5/4/2013 0:00	7/2/2013 0:00	7/3/2013 0:00
218	Closed Ssk	7/3/2013 0:00	499000	499000	490000	SW13103814	38139	92562	2500	199.6	1989	3920	8/6/2013 0:00	5/17/2013 0:00	7/3/2013 0:00
219	Closed Ssk	7/17/2013 0:00	529000	529000	518000	21474935	76440	92253	2151	245.99	2000	2614	3/10/2013 0:00	9/26/2013 0:00	7/17/2013 0:00
220	Closed Ssk	6/16/2013 0:00	559000	559000	530000	21474935	76440	92210	2250	255.56	1972	4856	4/13/2013 0:00	5/22/2013 0:00	7/29/2013 0:00
221	Closed Ssk	6/16/2013 0:00	559000	559000	530000	21468285	55847	92253	2848	187.98	1988	3920	1/11/2013 0:00	5/22/2013 0:00	6/14/2013 0:00
222	Closed Ssk	8/26/2013 0:00	625000	625000	570000	SW13069874	38111	92562	2808	197.73	1985	8776	4/16/2013 0:00	5/7/2013 0:00	8/26/2013 0:00
223	Closed Ssk	7/23/2013 0:00	625000	625000	600000	21476700	76582	92253	2489	246	1994	8776	8/9/2013 0:00	7/26/2013 0:00	7/23/2013 0:00
224	Closed Ssk	6/6/2013 0:00	870000	795000	795000	21466337	77800	92210	2756	288.25	1979	5227	11/27/2012 0:00	5/30/2013 0:00	6/6/2013 0:00
225	Closed Ssk	7/10/2013 0:00	1950000	1950000	1550000	21468352	47211	92210	3534	438.6	1987	6584	1/27/2013 0:00	6/4/2013 0:00	7/10/2013 0:00

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62	Closed Sale	#####	135,000	135,000	125,000	127,400	41082	CYPRESS	Street	92223	1740	71.84	1978	4356	#####	#####
63	Closed Sale	#####	129,900	129,900	129,900	127,400	19021	CYPRESS	Street	92220	1392	90.84	2004	16988	#####	#####
64	Closed Sale	#####	129,900	129,900	129,900	129,900	27903	Calle De Leon		92585	1430	90.84	2002	35719	#####	#####
65	Closed Sale	#####	129,900	129,900	130,000	130,000	60755	Rimrock Ca Road		92539	2860	45.45	1989	2031638	#####	#####
66	Closed Sale	#####	149,999	144,999	130,000	130,000	23441	Ohio	Place	92587	1456	89.29	2003	18731	#####	#####
67	Closed Sale	#####	127,000	130,000	131,050	131,150	38360	Via Ventoso		92563	1440	91.01	1989	3920	#####	#####
68	Closed Sale	#####	120,000	120,000	131,150	131,150	38415	Via Taflia		92563	1584	82.8	1986	4792	#####	#####
69	Closed Sale	#####	154,900	139,900	135,000	135,000	28640	Via Del Sol		92563	1548	87.21	2007	4356	#####	#####
70	Closed Sale	#####	150,000	150,000	135,000	135,000	24175	Minton	Road	92548	1344	100.45	1987	3218	#####	#####
71	Closed Sale	#####	145,000	139,900	135,000	135,000	28218	Patti	Lane	92585	93.75	1977	47045	#####	#####	#####
72	Closed Sale	#####	150,000	150,000	140,000	140,000	14597	Broadway Street		92230	2960	47.3	2005	38768	#####	#####
73	Closed Sale	#####	172,000	155,000	155,000	155,000	24487	Wagon Wh Lane		92595	1848	83.87	1983	9583	#####	#####
74	Closed Sale	#####	159,000	159,000	159,000	159,000	61203	Ritter	Avenue	92539	1788	88.93	1989	201683	#####	#####
75	Closed Sale	#####	159,900	159,900	161,000	161,000	25785	Indian Pain Road		92548	1960	82.14	2006	20909	#####	#####
76	Closed Sale	#####	159,900	159,900	165,000	165,000	33795	Flowershare Road		92595	1440	114.58	1989	7405	#####	#####
77	Closed Sale	#####	169,900	169,900	170,000	170,000	38061	Calle Clavel		92563	1584	90.04	1984	5663	#####	#####
78	Closed Sale	#####	169,980	169,980	170,000	170,000	34138	Olive Grow Road		92595	1588	100.19	1985	10019	#####	#####
79	Closed Sale	#####	180,000	180,000	170,000	170,000	33453	Harvest	Way	92595	1624	104.68	1988	6970	#####	#####
80	Closed Sale	#####	175,000	175,000	170,100	170,100	10701	Deerfield Drive		92223	1764	96.37	1988	4356	#####	#####
81	Closed Sale	#####	179,500	174,500	172,500	172,500	54945	MOUNT	Road	92539	2015	84.42	2006	108336	#####	#####
82	Closed Sale	#####	189,000	180,000	175,000	175,000	53412	Pony		92559	1920	89.84	2005	101059	#####	#####
83	Closed Sale	#####	189,000	180,000	175,000	177,000	34839	Olive Grow Road		92595	1646	106.32	1991	7405	#####	#####
84	Closed Sale	#####	179,900	179,900	179,900	179,900	34425	Almond	Street	92595	1878	94.25	1980	21780	#####	#####
85	Closed Sale	#####	165,000	165,000	180,000	180,000	34175	Harvest	Way	92595	1648	109.16	1985	10890	#####	#####
86	Closed Sale	#####	225,000	225,000	182,000	182,000	24790	Comstalk		92595	1584	113.64	1988	7841	#####	#####
87	Closed Sale	#####	229,500	194,500	182,000	182,000	20060	Bryant	Street	92595	1344	135.42	1977	4356	#####	#####
88	Closed Sale	#####	189,900	189,900	187,000	187,000	36040	Noble	Street	92263	1728	106.41	1986	45738	#####	#####
89	Closed Sale	#####	185,000	185,000	185,000	185,000	36058	Los Alamos Road		92563	1716	106.41	1985	200376	#####	#####
90	Closed Sale	#####	189,900	189,900	190,000	190,000	56905	Calle De Amor		92563	1586	116.65	2002	4356	#####	#####
91	Closed Sale	#####	201,250	201,250	190,000	190,000	32784	Engstrom	Road	92595	1740	107.47	2004	192535	#####	#####
92	Closed Sale	#####	230,000	200,000	196,500	196,500	24513	Batson	Lane	92595	1704	111.5	1981	22651	#####	#####
93	Closed Sale	#####	279,000	268,900	200,000	200,000	42465	Oak Circle Drive		92595	1152	164.93	1985	101495	#####	#####
94	Closed Sale	#####	229,000	229,000	210,000	210,000	18750	PROSPECT	Street	92241	2038	96.42	2005	76230	#####	#####
95	Closed Sale	#####	250,000	215,000	204,500	204,500	42465	Fresz	Road	92536	4490	44.54	1977	852905	#####	#####
96	Closed Sale	#####	250,000	215,000	204,500	204,500	42465	The Farm	Road	92536	4490	44.54	1977	852905	#####	#####
97	Closed Sale	#####	250,000	215,000	204,500	204,500	30958	Bench	Street	92548	1875	109.07	2004	39204	#####	#####
98	Closed Sale	#####	250,000	215,000	204,500	204,500	42310	Saddleback Drive		92536	2774	73.9	2004	109336	#####	#####
99	Closed Sale	#####	250,000	215,000	204,500	204,500	43720	Sorensen	Road	92562	1734	120.53	1993	211266	#####	#####
100	Closed Sale	#####	250,000	215,000	204,500	204,500	24984	3rd	Street	92562	1750	120	2005	6970	#####	#####
101	Closed Sale	#####	250,000	215,000	204,500	204,500	43540	Cowboy Co Road		92536	2312	90.83	2006	201247	#####	#####
102	Closed Sale	#####	250,000	215,000	204,500	204,500	34389	Olive Grow Road		92595	1908	110.06	1988	13068	#####	#####
103	Closed Sale	#####	250,000	215,000	204,500	204,500	24360	Leon	Road	92548	2574	94.21	2001	207346	#####	#####
104	Closed Sale	#####	250,000	215,000	204,500	204,500	20845	Woodshed Way		92595	1620	157.41	1987	20909	#####	#####
105	Closed Sale	#####	250,000	215,000	204,500	204,500	24285	Union	Street	92595	2131	119.66	2004	37897	#####	#####
106	Closed Sale	#####	250,000	215,000	204,500	204,500	24285	Adams	Avenue	92562	2640	96.97	2004	22216	#####	#####
107	Closed Sale	#####	250,000	215,000	204,500	204,500	34340	5	Street	92595	1992	130.52	1983	9148	#####	#####
108	Closed Sale	#####	399,000	399,000	340,000	340,000	32600	Watkins	Circle	92595	3040	107.57	2005	30492	#####	#####
109	Closed Sale	#####	399,000	399,000	340,000	340,000	3735	Pedley	Avenue	92860	1090	311.93	1951	103672	#####	#####
110	Closed Sale	#####	399,000	399,000	340,000	340,000	32650	Watkins	Circle	92595	2640	129.73	2004	29185	#####	#####
111	Closed Sale	#####	575,000	575,000	545,000	545,000	47950	Buildozer	Road	92536	1296	420.52	2010	1742400	#####	#####

Status is 'Closed Sale'

Type is 'Single Family Residence'

County is 'Riverside'

City is not in this list (click to view)

'Calimesa', 'Cathedral City', 'Corona', 'Hemet', 'Indio', 'Lake Elsinore', 'Menifee',  
'Moreno Valley', 'Palm Desert', 'Palm Springs', 'Perris', 'Rancho Mirage', 'Riverside',  
'Temecula'

Date COE/End is 8/1/2013 to 8/31/2013

Ordered by Current Price, Status, Area, Selling Price, List Price

Found 870 results in 5.17 seconds.

870 • ÷  
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435 • \*  
  
435 • +  
1 • +  
435 • \*  
  
276,100 • x  
0.95 • =  
262,200 • \*

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Status is 'Closed Sale'

Type is one of 'Condominium', 'Townhouse'

County is 'Riverside'

City is not in this list (click to view)

'Calimesa', 'Cathedral City', 'Corona', 'Hemet', 'Indio', 'Lake Elsinore', 'Menifee',  
'Moreno Valley', 'Palm Desert', 'Palm Springs', 'Perris', 'Rancho Mirage', 'Riverside',  
'Temecula'

Date COE/End is 6/1/2013 to 8/31/2013

Ordered by Current Price, Status, Area, Selling Price, List Price

Found 225 results in 2.47 seconds.

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2. =

112.5 \*

215,000. x

0.95 =

204,250. \*



Status is 'Closed Sale'

Type is 'Manufacture 433'

County is 'Riverside'

City is not in this list (click to view)

'Calimesa', 'Cathedral City', 'Corona', 'Hemet', 'Indio', 'Lake Elsinore', 'Menifee',  
'Moreno Valley', 'Palm Desert', 'Palm Springs', 'Perris', 'Rancho Mirage', 'Riverside',  
'Temecula'

Date COE/End is 6/1/2013 to 8/31/2013

Ordered by Current Price, Status, Area, Selling Price, List Price

Found 111 results in 0.19 seconds.

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12, 0 • x  
7, 05 • =  
14, 0 • \*

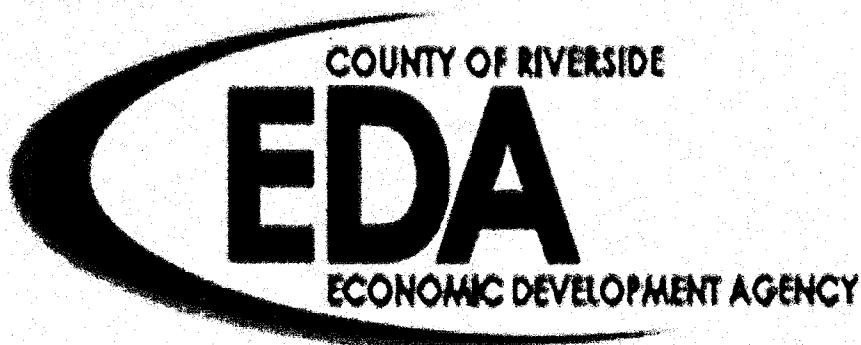
**RIVERSIDE COUNTY  
ECONOMIC DEVELOPMENT AGENCY**

**CITIZEN PARTICIPATION PLAN**

24 CFR Part 91.105

**2014-2019 CONSOLIDATED PLAN**

July 2014



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## **I. INTRODUCTION**

The following Citizen Participation Plan provides a framework and process by which the County's consolidated planning efforts comply with the citizen participation requirements of the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24 *CFR Part 91.105*.

This Citizens Participation Plan supersedes and replaces all previous plans adopted or amended for the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG) programs.

The County of Riverside receives annual grant funding from HUD for the CDBG, HOME, and the ESG programs. The Citizen Participation Plan is a component of: the five-year Consolidated Plan; each subsequent Annual Action Plan; each year's Consolidated Annual Performance and Evaluation Report; and any Substantial Amendments to the Consolidated Plan or its five Annual Action Plans. It is policy of the County to ensure adequate citizen involvement, with particular emphasis on participation by low- and moderate-income persons, in the planning, implementation, and evaluation of its housing and community development programs.

## **II. The Citizen Participation Plan for the County of Riverside addresses each of the following elements:**

### **A. Participation**

It is the policy of the County of Riverside to encourage and facilitate the wide-range participation of residents, service providers, government agencies, and other stakeholders in the development of all CPD required consolidated planning documents including the Five-Year Consolidated Plan, annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The primary purpose of the participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the consolidated planning process. The County shall provide for and encourage citizen participation with particular emphasis on: low- and moderate-income persons; persons residing in predominantly low -and moderate-income neighborhoods; persons residing in slum and blighted areas; and persons residing in areas where the use of CPD funds is being proposed.

The primary purpose and intent of HUD's CPD programs covered by this Citizen Participation Plan is to empower residents and improve communities by providing decent and affordable housing, a suitable living environment, and sustainable economic opportunities. The County encourages the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

Note: Although the term "citizen" is used in the Citizens Participation Plan for consistency with the statutory language (i.e., "Citizens Participation Plan"), Riverside County welcomes and solicits input from all county residents regardless of their citizenship or right-to-work status.

### Meeting the Needs of Non-English Speaking Persons

Throughout the unincorporated areas of Riverside County, there are significant populations of monolingual, Spanish-speaking persons residing in many of the very low, low, and moderate-income communities. For local Citizen Participation (CP) meetings and other public events in areas with considerable non-English speaking populations, translators can be provided and meeting materials made available in both English and Spanish. Whenever feasible, the County also utilizes Spanish radio stations, websites, flyers, brochures, and newspapers to announce the schedule of CP meetings. The County makes every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

### Access for Persons with Disabilities

It is the policy of Riverside County that there shall be no discrimination against persons because of race, religion, age, creed, color, sex, disability, sexual orientation, national origin, marital status, veteran's status or political belief or affiliation and that equal opportunity and access to facilities shall be available to all. The County is committed to providing equal access in its programs, services, and activities for persons with disabilities. Special accommodations or materials in alternative format, under the Americans with Disabilities Act, are available upon request. In addition, accommodations will be made, upon request, for attendees who are either visually or hearing impaired. Requests must be made at least 72 hours prior to meeting. Later requests will be accommodated to the extent feasible. Please call the Clerk of the Board office at (951) 955-1069, from 8:00 a.m. to 5:00 p.m., Monday through Friday or the ADA information line at (800) 514-0301 (*voice*) or (800) 514-0383 (*TTY*).

## **B. Public Hearings**

The County is required to conduct at least two public hearings per year to obtain the views and comments of residents, service providers, government agencies, and other stakeholders regarding the County's CPD-funded programs. The hearings generally address housing, social, and community development needs; proposed activities; and the review of program performance. The hearings will be conducted at a minimum of two different stages in the program year - at least one of these hearings must be held prior to the adoption of the proposed Consolidated Plan and/or annual One Year Action Plan (March-April). The second public hearing is usually conducted later in the year and focuses upon on the results reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER). On the day of the public hearing, comments may be submitted in writing or made orally to the Board of Supervisors at the public hearing.

The hearings will be held at times and locations convenient to potential and actual beneficiaries, with reasonable accommodation for persons with disabilities and non-English speaking residents.

The Cooperating Cities that participate in the County's CPD program are required to conduct their own Citizen Participation activities for their residents, especially low and moderate-income residents. At a minimum, these cities will publicly notice and hold at least one public meeting to discuss proposed uses of city's Community Planning and Development grant fund allocation.

Cities are required to submit copies of public notices, agendas, and minutes of such meetings to the County as part of the annual CDBG application process.

### **C. Public Notices**

All consolidated planning public hearings will be publically noticed for a period not less than thirty (30) calendar days in advance of the hearing date and at the beginning of official public comment periods. The notices will be published either as public notices or advertisements in one or more newspapers of general circulation serving the community of affected citizens. In areas where the County has determined that there is a substantial non-English speaking population within its jurisdiction, the hearing notice will be published in English and in the appropriate language(s). The notices will provide details concerning the nature of the public hearing, applicable HUD regulations, date and time of the hearings, and other necessary information. Public notices will also be posted on the Economic Development Agency's website ([www.rivcoeda.org](http://www.rivcoeda.org)) and referenced through press releases.

The County will also follow the above public noticing process for other "non-public hearing" CPD related actions to be taken by the Board of Supervisors. These actions include Substantial Amendments to the Consolidated Plan or Action Plans.

### **D. Access to Meetings**

It is the policy of the County to plan and conduct public meetings, also known as Citizen Participation (CP) meetings, related to the Consolidated Plan and annual Action Plans in unincorporated communities. These meetings shall be held at times and locations convenient to potential and actual program beneficiaries. In most cases, these CP meetings are conducted as part of regularly scheduled meeting of another community-based entity (e.g., Community Council or Municipal Advisory Council (MAC)). It has been the County's experience that the use of an existing community-based forum for the Citizen Participation Meetings ensures acceptable turn-out of residents, service providers, government officials, and other stakeholders. Citizens are invited to attend the meetings to learn about the programs and services available to them, express their views on their community's housing and community development needs, prioritize community needs, and comment on prior program performance. Attendees are also given the opportunity to complete the Needs Assessment Surveys, provided in English and Spanish, during the meetings or return them later. Prior to the Public Meetings, County-wide notices are published in one or more newspapers of general circulation, in the appropriate languages, announcing the purpose, date, time, and location of the meetings. In addition, accommodations will be made, upon request, for attendees with disabilities.

### **E. Public Comments**

It is the policy of the County to provide residents, service providers, government agencies, and other stakeholders a sufficient time period (not less than thirty (30) days) to review and comment on proposed consolidated plan, annual action plans, and substantial amendments. All public notices advise interested persons of the process to submit comments and obtain additional information regarding the proposed action. All CPD documents include a summary of all related comments received during the public comment period.

## **F. Strategic Plan Development**

Public meetings and hearings will be held to provide information and to obtain the views, concerns, ideas, and thoughts of residents and service providers during the development of the Consolidated Plan. It is the County's intention that the meetings and hearing be held with representatives of participating cities, agencies, organizations, and interested persons. During the preparation of the Annual Action Plan, meetings are held to consider the Urban County Program's short-term regional strategy for the use of federal funds.

The following program information is provided to the public:

- a. The estimated amount of funds available to the Urban County Program for community development and housing activities;
- b. The eligible program activities that may be undertaken with these funds;
- c. The unincorporated areas and locations proposed for utilizing the available funding; and
- d. The proposed allocation of federal funds to participating non-profit organizations, Cities, and unincorporated areas, and basic eligible program categories and proposed funding allocations for local funding programs.

## **G. Substantial Amendments**

From time-to-time, it may be necessary for the County to process a "substantial amendment" to the Five Year Consolidated Plan or the One Year Action Plans to allow for new CDBG, ESG, or HOME-funded activities; modification of existing activities; or other CPD program administrative actions.

Any proposed amendment that is considered a "substantial amendment" is subject to the Citizen Participation process, requires formal action by the Board of Supervisors, and approval by HUD. A thirty (30) day public notice is published to provide the opportunity for the public to review and comment on the proposed substantial amendments. The County will consider all comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105 (c)(3). A summary of these comments and views, including comments or views not accepted (and the reason why) shall be attached to the substantial amendment.

The County of Riverside is required by HUD [24 CFR 91.505 (b)] to identify the criteria to be used in determining if a proposed action will be considered a *Substantial Amendment*. The following criteria will be used by the County – if any one criterion applies, a substantial amendment will be required:

1. A new activity not previously listed and described in the Consolidated Plan/One-Year Action Plan;
2. When a proposal is made to amend the description of an existing activity in such a way that the newly described purpose, scope, location, or beneficiaries differ significantly from the original activity's purpose, scope, location, or beneficiaries; or
3. An increase in the amount of CPD funds allocated to an existing activity when the following apply:

- a. an increase in funding for a CDBG public service-type activity in an amount greater than \$75,000, or a 100% increase over the current funded amount, whichever is greater;
- b. an increase in funding for an Emergency Solutions Grant activity in an amount greater than \$75,000, or a 100% increase over current funded amount, whichever is greater; or
- c. an increase in the funding for other activities (public facility improvements, code enforcement, acquisition, etc.) in an amount greater than \$700,000, or a 100% increase over current funded amount, whichever is greater.
- d. an increase in the funding for HOME eligible activity in an amount greater than \$500,000, or a 50% increase over the current funded amount, but never to exceed \$500,000.

In an effort to efficiently utilize CDBG/HOME funds, the County will consider the reprogramming of unspent CDBG/HOME balances from completed and cancelled CDBG/HOME-funded activities to other eligible activities. In the event that any of these "administrative" reprogramming actions fall under the "substantial amendment" criteria, the proposed actions are subject to the Citizen Participation process, requires formal action by the Board of Supervisors, and approval by HUD.

The County will maintain and provide for public review a Reprogramming Action File that provides details for every reprogramming action (formal and administrative) taking place during the program year.

The County will submit Substantial Amendments to HUD on an annual basis including all pertinent documentation. Standard amendments and administrative updates are not formally noticed to the public, nor submitted to HUD. However, documentation describing general changes and/or identifying specific changes will be included in the annual Consolidated Annual Performance and Evaluation Report (CAPER), which is made available to the public.

#### **Amendment to Citizen Participation Plan**

During the County's administration of the CPD programs, it may become necessary to amend the Citizen Participation Plan. Any proposed amendment to the Citizen Participation Plan requires a thirty-day public notice, formal action by the Board of Supervisors, and approval by HUD.

#### **H. Access to Information**

The County shall provide opportunities for residents, public agencies, and other interested parties, including those most affected, with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan.



Standard documents will be available for public review at the County of Riverside, Economic Development Agency current address location and their web site, ([www.rivcoeda.org](http://www.rivcoeda.org)). These materials will also be available in a form accessible to persons with disabilities, upon request. Comments, questions, or suggested amendments should be directed to the CDBG Program Administrator at (951) 955-8916.

Standard program documents that shall be made accessible for public review and comment throughout the preparation process include: the proposed and final Consolidated Plan; Annual Action Plan; Consolidated Annual Performance Report (CAPER); Substantial Amendments; and this Citizen Participation Plan.

It is the policy of the County of Riverside to maintain and provide access to all applicable and appropriate records pertaining to the administration of the CDBG, ESG, and HOME programs. Records retention is a component of the County's CPD Program File Management System. Accordingly, the County will maintain and provide access to documentation and records for a period of five (5) years. Current copies of all major documents related to the current Consolidated Plan and related Consolidated Annual Performance and Evaluation Report (CAPER) will be posted on the County's Web site at [www.eda.org](http://www.eda.org). Copies may be requested in person, by mail, email or by telephone. Program records maintained on file, or requiring research and compilation, shall be provided within a reasonable time period upon receipt of a written request, which specifically states the information desired.

This paragraph is not intended to supersede the provisions of the Freedom of Information Act of 1966, as amended, which covers all programs and activities in the Consolidated Plan.

Most reasonable requests shall be filled at no cost to the public. Administering agencies reserve the right to charge a fee for duplicating documents when such requests are not reasonable. Reasonableness will be determined by a combination of the number of copies requested; the size (pages and/or dimensions) of the document; the length of time needed to compile the data; and the direct costs to the administering agency to duplicate the documentation.

**I. RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE POLICY HOME PROGRAM [24 CFR 42.325 and 91.353]**

The County of Riverside will replace all occupied and vacant "occupiable" lower-income housing demolished or converted to a use other than lower-income housing in connection with a project assisted with funds provided under the HOME Investment Partnership Act.

All replacement housing will be provided within three years after the commencement of the demolition or conversion. Before entering into a contract committing the County of Riverside to provide funds for a project that will directly result in demolition or conversion, the County of Riverside will make public by publication in a newspaper of general circulation and submit to HUD the following information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of lower income housing that will be demolished or converted to use other than as lower income housing as a result of an assisted project;

3. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent known, the address, number of bedrooms and location on a map of the replacement housing that has been or will be provided.
5. The source of funding and a time schedule for the provision of the replacement housing;
6. The basis for concluding that the replacement housing will remain lower income housing for at least 10 years from the date of initial occupancy;
7. Information demonstrating that any proposed replacement of housing units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in items 4 through 7 are not available at the time of general submission, the County of Riverside will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data are available.

The Economic Development Agency is responsible for tracking the replacement of lower income housing and ensuring that it is provided within the required period. The Owner/Developer will be responsible for providing relocation payments and other relocation assistance to any lower income person displaced by the demolition of any housing or the conversion of lower income housing to another use.

Consistent with the goals and objectives of activities assisted under the Act, the County of Riverside will take the following steps where appropriate to minimize the direct and indirect displacement of persons from their homes:

1. Coordinate code enforcement with rehabilitation and housing assistance programs.
2. Evaluate housing codes and rehabilitation standards in reinvestment areas to prevent undue financial burden on established owners and tenants.
3. Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
4. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
5. Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.
6. Adopt policies which provide reasonable protections for tenants faced with conversion to a condominium or cooperative.

7. Adopt tax assessment policies, such as deferred tax payment plans, to reduce impact of increasing property tax assessments on lower income owner-occupants or tenants in revitalizing areas.
8. Establish counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of revitalization pressures.

#### **J. Performance Reports**

Each fiscal year the County is required to provide a sufficient time period (not less than fifteen (15) days) for review and comment on the proposed Consolidated Annual Performance and Evaluation Report (CAPER) based on the previous program year. The information compiled in this document is necessary to assess the progress on funding received by the County, participating/metro cities, non-profits, and other agencies or organizations. Data gathered in the compilation of the annual report will be used to supply information to HUD and the public on the accomplishments and services provided. The information will include the number of people served, ethnicity, income category, objective and outcome, and type of service received, as well as the current status on housing, public facilities and improvements, and other projects. The information is also used to determine future funding considerations. A copy of the CAPER will be available at EDA for review and can be located on the following web site: [www.rivcoeda.org](http://www.rivcoeda.org). The CAPER shall be submitted to HUD within ninety (90) days after the end of the program year and prior to September 30 of each year. Final reporting documents will also be made available to any interested parties upon request.

The second public hearing (See Section B) is usually conducted later in the year and is based on a summary of results reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER). A 30-day public notice is published in one or more newspapers of general circulation in English and, if necessary, in the appropriate language(s) so that Citizens will be provided reasonable notice to review and present comments on performance.

#### **K. Technical Assistance**

Technical assistance is made available as necessary to groups and organizations representative of persons of low and moderate-income that requests such assistance in developing proposals for funding assistance under the Consolidated Plan.

EDA makes technical assistance available to current and potential activity sponsors through the Program Managers who are the main source of information on CPD programs and the application process. Program Managers are available to provide assistance at community meetings and during proposal preparation, evaluation, review, and monitoring. Although the Program Managers are the primary contact to the communities and service providers, all other related EDA resources will be made available.

#### **L. Complaints**

Residents or other interested parties may submit complaints to the County in relation to administration of the CPD-funded programs. Complaints may be made via telephone by calling (951) 955-8916 or in writing to the Economic Development Agency. The complaining party should state the nature of the complaint, what prior efforts have been made to resolve the

problem and any other pertinent information which would help staff determine a solution. All complaints will receive careful consideration and a timely, substantive response will be provided within fifteen (15) working days.

#### **M. Monitoring and Evaluation**

In accordance with HUD CPD program regulations, the County continually monitors all CPD-funded sub-recipients and their activities. The County's CPD Program Monitoring Policies were developed and adopted in April 2006, through Administrative Program Notice 2006.01, and subsequently revised to ensure compliance with 24 CFR 570.502 (CDBG), 24 CFR 576.500 (ESG), and 24 CFR Part 85.40 (a).

HUD regulation 24 CFR Part 85.40 (a) provides for the general program monitoring responsibilities of the County in the administration of the HUD-funded CPD programs.

**Monitoring by grantees** Grantees are responsible for managing the day-to-day operations of grant and sub grant supported activities. Grantees must monitor grant and sub grant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function, or activity.

## **Definitions**

**CDBG:** Community Development Block Grant, a HUD grant which provides for a variety of community development programs that benefit low and moderate income persons.

**ESG:** Emergency Solutions Grant, a HUD grant that provides funds for services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

**HOME:** Home Investment Partnership Programs, a HUD grant that provides funds to expand the supply of decent and affordable housing for low income households.

**One-Year Action Plan (OYAP):** This document updates the Consolidated Plan on an annual basis and allocates one year's funding (entitlement and program income) to specific projects and activities for the CDBG, ESG, and HOME programs.

**Consolidated Plan:** This document is submitted to HUD and serves as the planning documents of the jurisdiction and application for funding CDBG, ESG, and HOME. The document is developed in accordance with 24 CFR Part 91 and sets forth the priorities and strategies of the programs for a five-year period.

**CAPER:** (Consolidated Annual Performance Evaluation Report). This document reports on the progress made in carrying out the Consolidated Plan and One-Year Action Plan. The Agency prepares the report annually in accordance with 24 CFR Part 91.

**Low and Moderate Income Persons** – An individual from a household with a total income does not exceed eight-percent (80%) of the median household income for the area (Riverside-San Bernardino Counties), adjusted for family size.

**EDA:** Economic Development Agency – responsible for administration of the County's CDBG and ESG programs.

**HUD:** the U.S. Department of Housing and Urban Development.

**COUNTY OF RIVERSIDE  
2014 FAIR HOUSING IMPEDIMENTS STUDY**



Prepared by  
Riverside County Economic Development Agency  
Rob Field, Assistant County Executive Officer/EDA

**COUNTY OF RIVERSIDE  
2014 FAIR HOUSING IMPEDIMENTS STUDY**

**Board of Supervisors**

Jeff Stone, Chairman  
Marion Ashley, Vice-Chairman  
Kevin Jeffries, Supervisor  
John F. Tavaglione, Supervisor  
John J. Benoit, Supervisor

**Prepared by**

Riverside County  
Economic Development Agency

Rob Field, Assistant County Executive Officer/EDA

Heidi Marshall, Assistant Director  
Suzanne Holland, Assistant Director

**Technical Assistance**

Fair Housing Council of Riverside County, Inc.  
Rose Mayes, Executive Director

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## **SECTION I INTRODUCTION**

The mission of the County of Riverside is to promote economic opportunity and affordable housing that provides a suitable living environment, free of discrimination to all persons.

### **A. Purpose**

It is the intention of the County to provide community development and housing opportunities without regard to arbitrary factors and affirmatively further fair housing on a countywide basis. Fair Housing Choice can be defined as the ability of persons of similar income and have available to them the same housing choices without regard to race, color, national origin, religion, sex, familial status, disability, ancestry, marital status, source of income, sexual orientation, or other arbitrary factors.

The County has prepared this update of its Fair Housing Impediments Study pursuant to 24CFR 570.904(c)(1) of the Community Development Block Grant (CDBG) regulations. The CDBG program is funded and administered by the federal government through the Department of Housing and Urban Development (HUD). The purpose of this study is to revisit the County's 2009 Fair Housing Impediment Study (2009 Study) and to determine if the impediment findings at the time have been addressed and resolved. Areas of review in the 2009 Study extended beyond fair housing choices within the County and the County's CDBG Cooperating Cities to include impediments relating to the sale or rental of dwellings, the provision of housing brokerage services, the provision of financing for housing, public policies and actions, and administrative policies concerning community development and housing activities. A list of terms and definitions used in this report can be found in the Appendix A.

### **B. Methodology**

The two primary sources used to analyze data for this study consist of the following: published literature, policies and data; and the fair housing audit developed and conducted specifically for the purpose of this study to identify the incidents of unfair treatment. In addition to the 2014 study, the literature and data reviewed for this study included:

- Riverside County's General Plan
- Ordinances
- The general plans/zoning ordinances of the 13 CDBG cooperating cities
- Riverside County housing and community development programs and administrative policies

- Data collected by the Fair Housing Council of Riverside County, Inc. pursuant to the contract to provide fair housing services for the County
- Demographic data (Countywide areas –unincorporated and incorporated)
- Home Mortgage Disclosure Act (HMDA) reports
- Community Reinvestment Act (CRA) information pertaining to lending institutions throughout the County
- Other studies and analyses of fair housing opportunities

The Fair Housing Council of Riverside County (FHCRC) has been contracted by the County to provide fair housing services for the unincorporated areas as well as the County's 13 CDBG Cooperating Cities. The County's Urban County CDBG Program consists of the unincorporated communities, thirteen (13) participating cities, and one Joint/Metropolitan City. The participating cities are: Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, La Quinta, Murrieta, Norco, San Jacinto, and Wildomar (Cooperating Cities). The City of Lake Elsinore is considered a CDBG Entitlement City, and receives a CDBG allocation from HUD. However, the City has elected to participate in the County's Urban County program as a Joint Metro City/Urban County applicant. All fourteen (14) cities signed a three year cooperation agreement for program years 2012/13 through 2014/15.

The services provided by the FHCRC include anti-discrimination activities, landlord/tenant mediation, technical assistance, and fair housing education. In addition to opening satellite offices in the eastern part of the County to serve the desert region, a specific component of the County's 2013/2014 CDBG contract with the FHCRC is the Proactive Technical Assistance Testing Component, also referred to as the Fair Housing Audit. The purpose of audit is to identify current impediments and provide recommendations that the County will review and implement or address on a continuous basis.

As directed, FHCRC conducted objective, proactive testing in the areas of rental housing, for-sale housing and housing finance. Five target locations were selected as a representative sample of jurisdictions countywide. FHCRC conducted 12 validated tests for rental housing, 6 validated tests for the sale of the housing, and 6 validated tests for housing finance. The results of these tests are contained within this study, and the complete report, Fair Housing Audit Analysis, prepared by the FHCRC is included as Appendix B.

### **C. SUMMARY OF 2009 STUDY**

The Fair Housing Impediments Study prepared by the County of Riverside in 2009 consists of the following chapters:

1. Introduction, which presents the Study's purpose and the methodologies utilized in its preparation.
2. Community Profile, which describes the characteristics of the study area's population, as well as the area's fair housing profile.
3. Impediments to Fair Housing Choice, which outlines the procedures involved in obtaining housing, the policies and actions of public bodies as they pertain to protecting fair housing choice, and the administrative policies of various bodies responsible for implementing those policies.
4. Recommendations, which provides recommendations for ensuring fair housing choice within the County and its CPD Cooperating Cities, as well as recommended procedures to be followed by the Fair Housing Council of Riverside County.
5. Appendices, consisting of the following documents and exhibits:
  - 2008 Fair Housing Audit Analysis prepared by the Fair Housing Council of Riverside County, Inc.
  - Racial/Ethnic Concentration Map prepared by the County of Riverside
  - Low/Moderate Income Concentration Map prepared by the County of Riverside

The findings of the 2009 Study indicated the following:

While it can be difficult to prove that discrimination has occurred, the concentration of complaints, particularly complaints of a similar type is a reasonably good indicator that some sort of problem exists. The 2009 Study concluded that, based on an evaluation of data presented therein, discrimination based on disability and race represented the most common categories of complaint. The report also suggested that discrimination persisted countywide in the categories of family status as well as in the mortgage lending industry. The conclusion regarding disability, race, and family status was supported by the experience of FHCRC testers, who reported instances of discrimination.

The 2009 Study discussed the following categories of potentially significant impediments to a fair housing choice within the County and its Cooperating Cities:

- Increased need for additional affordable rental housing due to the effects of the foreclosure crisis in California
- Lack of available housing in Riverside County
- Discrimination in housing accessibility based on disability and race

- Unequal treatment of persons in the sale and rental of housing based on disability and race
- Discrimination in the rates of housing loan approvals based on race
- Potential impediments created through Housing Elements
  - Housing Elements that have not been reviewed and approved by the State of California and therefore have the potential to be out of compliance with state laws regarding housing availability
- Potential impediments created through Land Use Controls
  - Zoning ordinances that do not include state-mandated density bonus rules for affordable housing

The 2009 Study then presented the following recommendations regarding the elimination of these impediments:

#### **Increased Need and Lack of Affordable Housing**

- Alleviate governmental constraints to include reduction in developer fees which add to the cost of housing and developer costs, a major impediment to fair housing in that the fees are passed on to the homeowner through the purchase price or the rent charged.
- Recommend that each Cooperating City develop a fast track/priority processing systems for affordable projects.
- Reduce the cost of housing to the consumer, be it rental or single-family homes, through the elimination of unnecessary governmental actions, policies and regulations.
- Minimize the impact of nongovernmental constraints beyond the control of local government that potentially can impact any action of the City or County Processing.

#### **Discrimination in Housing Accessibility**

- Broaden the understanding of diversity in cultures in various communities through education, training, and outreach seminars, regarding Fair Housing laws and cultural sensitivity to rental property owners, managers, and agents, as well as apartment owners associations, board of realtors, management companies, lending institutions, building industry associations, and home seekers.

#### **Unequal Treatment in Sale and Rental of Housing**

- Conduct audits periodically to determine the nature, extent and changes in housing discrimination throughout the audited cities. These audits should be expanded to include other characteristics such as discrimination based on race, sex, sexual orientation, religion, and any other protected classes defined by law. The results of the audits should be provided to FHCRC so that they can be tracked and used to supplement information routinely recorded by FHCRC's systems.
- Develop an anti-discrimination campaign and literature focusing on fair housing law and enforcement activities on both the purchase and rental market.
- Promote fair housing laws in rental housing, mortgage lending, and real estate sales markets within the audited cities.
- Encourage rental property owners, managers, realtors and lending agents to provide written information to all applicants that includes the listing of all available housing, standard information on the terms and conditions of the application process, posting Fair Housing informational signs, and providing Fair Housing literature.

#### **Discrimination in Rates of Housing Loan Approvals**

- Provide homebuyer education, credit counseling, and fair housing counseling and awareness training to the first time homebuyers and homeowners, particularly low income and very low income applicants.

#### **Potential impediments created through Housing Elements and Land Use Controls**

- Ensure that CDBG cooperating cities have an approved Housing Element that incorporates state mandated density rules into their respective zoning ordinances. Not all CDBG Cooperating Cities evaluated in this study have an approved Housing Element.
- Develop zoning ordinances and the General Plan throughout the County that are consistent in establishing Density Bonus projects in mixed/regional commercial and high density residential areas, and for multiple bedroom density bonus projects.
- Establish a wider range of zoning and specific plan implementation to meet affordable housing needs by the Cooperating Cities.
  - Each CDBG Cooperating City should develop zoning codes similar to Ordinance No. 348, an ordinance of the County of Riverside providing for land use planning, zoning regulations, and related functions.

### **Discrimination Based on Disabilities**

- Provide education and outreach to housing providers through seminars or community workshops to inform the public of the current law on discrimination against the disabled.

### **Shortfalls in FHCRC Data Collection**

- Amend Cooperating Cities' General Plan Housing Elements to ensure that they are in compliance with state laws regarding housing availability, and have them reviewed and approved by the State of California within a specified timeframe
- Encourage Cooperating Cities to promote and utilize Fair Housing Program Services on the behalf of their residents
- To the maximum extent practical, shift FHCRC resources from landlord/tenant information services to discrimination prevention and enforcement activity support
- Have FHCRC provide training to CDBG grant recipients in various aspects of fair housing law compliance
- Implement a FHCRC-managed system that will track discrimination complaints on a demographic/geographic basis to enhance reporting capabilities
- Target the mortgage industry for specific FHCRC testing to establish the approximate extent of discrimination within the industry
- Continue FHCRC-provided education to landlords and property management firms in fair housing laws and regulations as they pertain to the rental housing industry
- Continue and expand fair housing outreach programs intended to meet the needs of the County's Hispanic population, including the development of marketing materials and presentations in Spanish

## **SECTION II COMMUNITY PROFILE**

### **A. POPULATION CHARACTERISTICS**

#### **1. Background**

Riverside County is the fourth largest county in California and was founded in 1893. It is one of the most diverse counties in California. The County contains 28 incorporated cities and spans an area of 7,207 square miles. The County is bounded by San Bernardino County on the north, Orange County on the west, San Diego and Imperial Counties on the south and the Colorado River and the State of Arizona on the east. It offers its residents and visitors a wide range of unique lands that differ in physical, climatic and biotic conditions. There are fertile valleys with an extensive array of agricultural crops; undulating and rugged terrain with beautiful mountains, streams and rivers; and deserts.

Of the aforementioned 28 incorporated cities, 13 are "Cooperating Cities" that participate in the HUD-funded Community Planning and Development (CPD) program's Community Development Block Grant (CDBG) Program as "sub-grantees". In addition, there are dozens of unincorporated communities within the County, and extensive landholdings managed by state and federal agencies.

According to population projections by the California Department of Finance, Riverside County will have the largest growth over the next 50 years (2010 to 2060) of any county in the state, growing by approximately 2 million. Riverside will become the second most populated county in the state at 4.2 million, trailing only Los Angeles at 11.6 million. The Inland Empire, which includes Riverside and San Bernardino counties, is expected to grow by 3.4 million. In recent years, many who have relocated to the County have continued to work in and commute to Orange and Los Angeles Counties. Table II-1 shows Riverside County's population, ethnic distribution and rate of growth as tabulated in the 2010 Census and the Census Bureau's 2012 American Community Survey (ACS).

#### **2. Population and Ethnicity**

Much of the population growth of the last decade within the County is due to its location within the Southern California region. The combination of Southern California's job market, transportation, infrastructure, lower housing prices and inexpensive and plentiful land for housing has contributed to increased development pressures countywide. The growth resulting from these factors has also resulted in a diversification of the economic base of the County, and has led to increased industrial, commercial and tourism-related development. Agriculture continues to be economically important and is expected to remain a viable industry in the future. Changing economic, political and environmental factors are expected to have significant effects on future growth in the County.



**Table II-1**

<b>Riverside County Population and Ethnic/Racial Distribution</b>						
	<b>2010</b>	<b>2010</b>	<b>2012</b>	<b>2012</b>	<b>Numeric</b>	<b>Percent</b>
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	<b>Change</b>	<b>Change</b>
White	870,682	39.5%	871,815	38.4%	1,133	0.1%
Hispanic	1,004,418	45.6%	1,055,510	46.5%	51,092	5.1%
Black or African American	126,931	5.7%	134,585	5.9%	7,654	6.0%
Asian	128,595	5.8%	130,057	5.7%	1,462	1.1%
American Indian and Alaska Native	9,566	0.4%	10,835	0.5%	1,269	13.3%
Native Hawaiian & Other Pacific Islander	6,588	0.3%	6,050	0.3%	-538	-8.2%
Other race	4,719	0.2%	2,553	0.1%	-2,166	-45.9%
Two or more races	51,833	2.4%	57,378	2.5%	5,545	10.7%
<b>Total</b>	<b>2,203,332</b>		<b>2,268,783</b>			

Source: 2010 and 2012 American Community Survey, One Year Estimates

As indicated in Table II-1, the largest growing ethnic group in the County is Hispanic residents, up by 51,092 persons or 5.1% from 2010 to 2012. However, the American Indian and Alaska Native population grew by a larger percent (13.3%) or by 1,269 persons during that time period. Residents of Black or African American heritage grew by 7,654 (6%), and Asian residents by 1,462 persons (a 1.1% increase). According to the California Department of Finance, by the year 2020, it is estimated that the Hispanic population will increase to 1,226,257, the population of Black/African Americans will increase to 159,275 and the Asian population will total approximately 176,634.

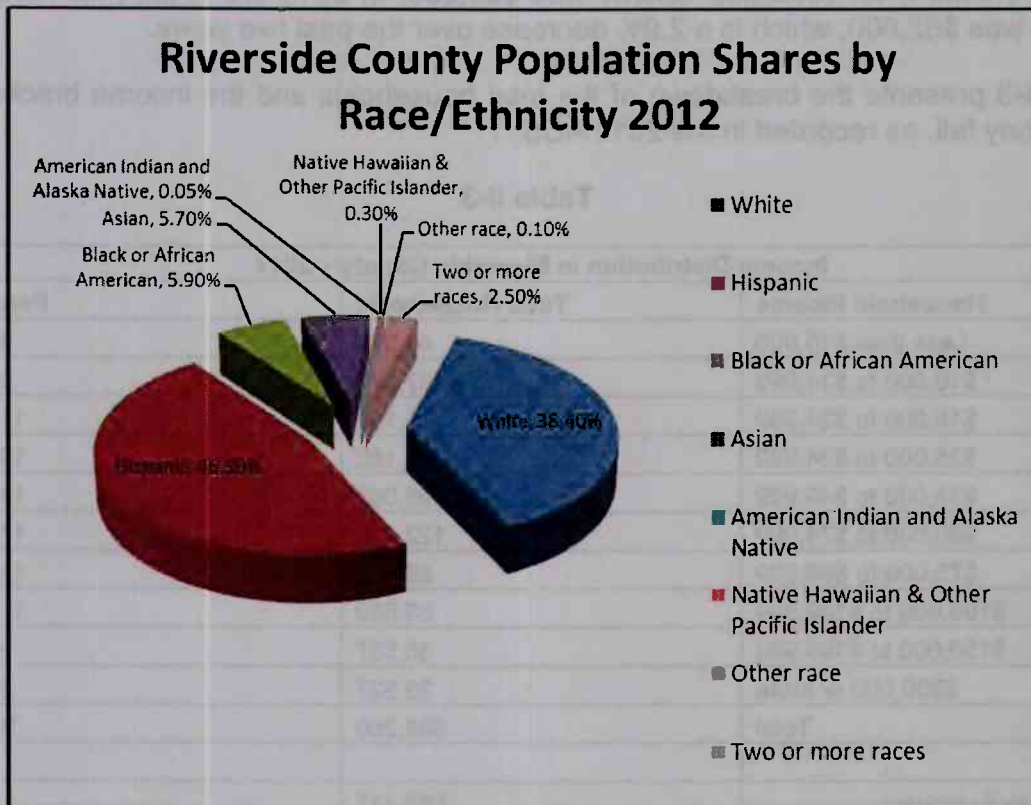
Hispanics represent the single largest group of the County's population at 46.5%, surpassing Whites at 38.4%. The White population had the third lowest growth rate (0.1%) of any ethnic/racial group in the County from 2010 to 2012, ahead of Native Hawaiian and Other Pacific Islander and Other race with declining populations of -8.2% and -45.9% respectively. California's White population has declined by 247,914 from 2000 to 2007, representing a 1.6% decrease.

According to the 2010 ACS, females represent 1,138,987 (50.2%) of the County's total population of 2,268,783. The County placed fourth overall in population in the State of California but by 2060 is expected to become the second most populated county in the State of California, second only to Los Angeles.

Maps depicting ethnic concentrations for the Supervisorial Districts of Riverside County by census tracts are included in Appendix C. The exhibits indicate areas where the presence of ethnic concentrations are 55.5% or greater. The higher concentrations are represented by darker color.

Figure 1 below shows the population shares by race and ethnicity based on the 2012 ACS.

Figure 1



According to the 2010 Census, 95.4% (2,088,429 persons) of Riverside County's residents reside in urban locations and 4.6% (101,212 persons) reside in rural areas. An evaluation of residents countywide as shown in Table II-2 indicates that in 2012, 27.3% were under 18 years of age, 60.2% were between the ages of 18 and 64, and 12.4% were 65 or older. In 2012 the countywide median age was 34.

Table II-2

Riverside County Population by Age				
	2010		2012	
Age < 18 Yrs.	623,638	28.3%	621,040	27.3%
Age 18-64 Yrs.	1,318,983	59.8%	1,366,330	60.2%
Age 65 & over	260,711	11.8%	281,413	12.4%
Total	2,203,332	100.0%	2,268,783	100.0%

Source: 2010 and 2012 American Community Survey: One Year Estimates

### 3. Income Characteristics

The County's median household income in 2012 was \$52,621, a decrease of 3.1% over the 2010 median household income of \$54,296. The 2009 HUD Area Median Family Income (HAMFI) for Riverside County was \$64,500. In 2013 the HAMFI for Riverside County was \$62,600, which is a 2.9% decrease over the past five years.

Table II-3 presents the breakdown of the total households and the income brackets in which they fall, as recorded in the 2012 ACS.

**Table II-3**

<b>Income Distribution in Riverside County – 2012</b>		
<b>Household Income</b>	<b>Total Households</b>	<b>Percent</b>
Less than \$10,000	40,884	6.0%
\$10,000 to \$14,999	37,131	5.4%
\$15,000 to \$24,999	78,164	11.4%
\$25,000 to \$34,999	71,160	10.4%
\$35,000 to \$49,999	98,067	14.3%
\$50,000 to \$74,999	122,548	17.9%
\$75,000 to \$99,999	89,653	13.1%
\$100,000 to \$149,999	88,589	12.9%
\$150,000 to \$199,999	35,537	5.2%
\$200,000 or more	23,527	3.4%
Total	685,260	100%
Median family income	\$59,437	
Median household income	\$52,621	
Source: 2012 American Community Survey: One year Estimate		

An evaluation of households by income category from the HUD Comprehensive Housing Affordability Strategy (CHAS) databook indicates that in 2000, 112,423 households had incomes at or below 50% of the median income and were considered very-low income. These households represented 24.2% of the total households countywide. In year 2010, this number increased to 173,218 households, a 54.1% increase over a ten year period. Appendix D consists of maps depicting concentrations of Low/Mod areas in the County based on HUD Low and Moderate Income Summary Data, FY13. Table II-4 provides a breakdown of low and very low income data based on 2006-2010 CHAS data.

**Table II-4**

<b>Low and Very Low Income Households in Riverside County</b>								
Households by Income	Elderly (1 & 2 members)	Small Related (2 to 4 members)	Renters		All Other	Total Renters	Total Owners	Total Households
			Large Related (5 or more members)					
< = 50 MFI	18,927	56,153	28,200		30,707	88,928	84,158	173,218
> 50 to < = 80% MFI	17,666	48,375	26,417		17,430	49,017	79,198	128,215
> 80% MFI	58,966	208,970	70,068		88,669	61,490	339,313	427,928
<b>Total Households</b>	<b>95,559</b>	<b>313,498</b>	<b>124,685</b>		<b>136,806</b>	<b>199,435</b>	<b>502,669</b>	<b>729,361</b>
Source: 2006-2010 CHAS Data								

#### **4. Employment and Transportation**

In the 2012 ACS, Riverside County had a total of 1,039,812 persons age 16 and older in the labor force. The civilian labor force represented 1,035,138 persons, or 99.6% of the total labor force. In 2012, 152,235 persons were unemployed, for an unemployment rate of 14.7% of the civilian labor force. The local economy is still recovering from the recession, ignited by the collapse in the housing market caused by one of the highest foreclosure rates in the nation. Not only did the construction and lending industries decline, but the wave of unemployment trickled into almost every area, which included retail and manufacturing. The most recent figures show an estimated unemployment rate of 9.1% for Riverside County in December 2013.

According to the California Employment Development Department, industries with the largest employment in Riverside County in December 2013 were Total Wage and Salary (1,210,600 employed), Total Nonfarm (1,194,900 employed) and Service Providing (1,046,400 employed). According to the 2012 Riverside County Agricultural Production Report, countywide agricultural production totaled 1.25 billion dollars. Riverside County is the thirteenth-largest agricultural producing county in California.

The primary mode of transportation for Riverside County residents is the automobile. The County has an extensive road network which includes Interstate Freeways, State Highways and local roads. Public bus transportation is available in the more populous locations. Commuter rail service from Riverside into Los Angeles County, Orange County and San Diego County is now available.

#### **5. Housing**

According to the 2012 ACS, 805,050 housing units were counted in Riverside County. This figure represents an increase of 0.5% over the 2010 Census count of 800,707. Of the total housing units, 685,260 were occupied which translates to an overall vacancy of 14.9%. Of the occupied housing units, 243,096 (35.5%) of the units were renter-

occupied housing units and 442,164 (64.5%) were owner-occupied housing units. In addition, 5.9% of existing rental units were vacant while 2.2% of owner-occupied units were vacant. Table II-5 presents the housing distribution in Riverside County based on the 2010 and 2012 ACS.

**Table III-5**

<b>Riverside County Housing Stock</b>					
	<b>2010</b>		<b>2012</b>		<b>Percent Change</b>
Single Family Units	594,406	74.2%	599,506	74.5%	0.9%
Multiple Family Units	132,038	16.5%	133,477	16.6%	1.1%
Mobile Homes	73,182	9.1%	70,694	8.8%	-3.4%
Other (Boat, RV etc.)	1,698	0.2%	1,373	0.2%	-19.1%
<b>Total</b>	<b>801,324</b>	<b>100.0%</b>	<b>805,050</b>	<b>100.0%</b>	<b>0.5%</b>
Source: 2010 and 2012 American Community Survey: One year Estimates					

According to the 2012 ACS, the number of households in the County increased by 15,215 to a total of 685,290 households. This is a 2.3% increase since the 2010 Census. Riverside County had the second largest household increase in the State of California from 2000 to 2007. Southern California Association of Governments (SCAG) forecasts that the number of households will continue to increase to 834,000 households by the year 2020.

Units with more than one person per room are considered overcrowded. In Riverside County, 7.8% of the occupied inventory had more than one person per room.

Table II-6 presents the median home value, median rent and median household income for both 2010 and 2012.

**Table II-6**

<b>Riverside County Cost of Housing</b>			
	<b>2010</b>	<b>2012</b>	<b>Percent Change</b>
Median Home Value	227,900	220,000	-4%
Median Rent	1,121	1,129	1%
Median Household Income	\$54,296	\$52,261	-4%
Source: 2010 and 2012 American Community Survey: One year Estimates			

Over forty-seven percent (47.6%) of homeowners and 19.6% of Riverside County renters devote 30% or more of their household income to housing cost.

As of 2010, approximately 33.1% of the County's housing stock was 30 years or older, compared to 25.1% in 2000. As the County's housing ages, maintenance and repair

become more critical. If homes fall into disrepair, residents may be subject to unsafe and/or unhealthful living conditions. If maintenance is ignored long enough, housing may become uninhabitable, reducing the total number of units available within the County.

In the County Market Update for December 2013, the California Association of Realtors® reports that the median home price for Riverside County is \$310,020, which is a year to year increase of 23.3%. Housing affordability will remain an issue as median home prices increase and homeownership opportunities decline especially for low-income families.

## 6. Poverty and Income

The proportion of the Riverside County population living below the poverty threshold varies widely by race and ethnicity. Table II-7 shows the number of persons that are below poverty level across all races.

**Table II-7**

<b>Persons by Race/Ethnicity and Poverty Level Status in Riverside County</b>						
Race/ Ethnicity	Poverty Level Status				% of Race Below Poverty	
	Below Poverty		At or Above Poverty		Below Poverty	
	2010	2012	2010	2012	2010	2012
White (ALONE)	198,862	228,600	1,268,521	1,240,746	13.6%	15.5%
Black or African American	26,563	31,841	103,870	104,346	20.4%	23.4%
Asian	16,003	11,738	114,975	117,689	12.2%	9.1%
American Indian and Alaska Native	3,795	3,137	13,939	15,499	21.4%	16.8%
Native Hawaiian and Other Pacific Islander*	N/A*	N/A*	N/A*	N/A*	N/A*	N/A*
Other race	93,529	99,828	228,992	278,739	28.9%	26.4%
Two or more races	12,970	16,204	78,866	74,831	14.1%	17.8%
<b>Total County</b>	<b>354,152</b>	<b>398,102</b>	<b>1,817,252</b>	<b>1,836,015</b>	<b>16.3%</b>	<b>17.8%</b>
Hispanic**	224,642	249,697	765,815	789,808	22.7%	24.0%
*Data cannot be displayed because the number of sample cases is too small, but is included in the total.						
**Hispanics can be of any race.						
Source: 2010 and 2012 American Community Survey: One year Estimates						

According to the data, approximately one in six Riverside County residents or 17.8% (398,102) of the population lived below poverty in 2012. The number of Hispanics that were below poverty increased from 224,642 in 2010 to 249,697 in 2012, an 11.2% increase. In high poverty areas such as the eastern part of Riverside County, households tend to spend more than 30% of their income in rent. In 2012, the number

of households that paid 30% or more of their income in rent was 139,706 out of 230,717 or 60.6%. In 2010, 127,258 out of 202,815 or 62.7% paid amounts exceeding that threshold. This represents a 9.8% increase in the number of households that were cost burdened over the two year period. The tight supply of affordable housing increases the pressures on these residents.

## **7. Projections**

SCAG projects that the County's total population will reach 2,592,000 in 2020, representing a growth rate of 21.8% over the twelve year period from 2008 to 2020. SCAG also projects that the number of households in Riverside County will reach 834,000 in 2020, a 22.8% growth rate from 2008 to 2020.

Long-range projections from the California Department of Finance show that the County's total population will reach 4,216,816 by 2060, growing by 92.4% from 2010 to 2060. Riverside County is expected to have the largest growth and be the second most populated county in California, behind Los Angeles County's 11.6 million people and ahead of San Diego County's 4.2 million residents.

## **B. CURRENT FAIR HOUSING PROFILE**

### **1. Landlord/Tenant and Discrimination Complaints**

As has been previously stated, the FHCRC addresses complaints relating to landlord/tenant disputes and housing discrimination.

#### **a. Landlord/Tenant Complaints**

Landlord/tenant complaints involve alleged violations of the California Civil Code as it relates to the legal responsibilities and duties of landlords and tenants. The FHCRC is set up to provide technical assistance and mediation services to both parties involved in a landlord/tenant dispute. According to the FHCRC, most landlord tenant disputes that are actual violations of the Civil Code consist of illegal evictions, unlawful retention of security deposits, and breaches of the warranty of habitability. If left uncorrected, legitimate violations have the potential to create impediments to fair housing by limiting access to housing of choice, affordable or otherwise.

Table II-8

		LANDLORD TENANT CALLS																								
		Case Category							Action																	
		Eviction	Repairs	Deposits	Entering	Occupancy	Mobilehome	Lease	Other	Late	Rent Inc.	Sec 8	Notice	Habitability	Mold	Rental Assistance referrals	Homeless Assistance	Lead	Total	Mediation	Counseled/Referred	Resolved	Total	Senior	Disabled	FHH
FY08-09	654	871	160	63	10	51	483	348	3	43	8	86	13	14	0	0	0	1	2808	26	1495	278	1799	64	55	257
FY09-10	483	804	123	72	3	41	197	349	5	16	26	163	57	39	2	7	0	0	2387	38	1119	120	1277	41	55	114
FY10-11	384	1178	312	137	25	68	264	1024	19	69	32	568	74	271	23	9	3	3	4460	190	993	415	1598	123	236	406
FY11-12	432	1072	262	119	30	42	275	695	21	59	74	430	99	86	20	51	54	54	3821	121	1318	0	1439	84	234	357
FY12-13	323	1008	402	130	80	62	595	490	6	56	9	543	93	101	32	10	0	0	3940	86	1433	0	1519	90	224	330
<b>TOTAL</b>	<b>2276</b>	<b>4933</b>	<b>1259</b>	<b>521</b>	<b>148</b>	<b>284</b>	<b>1814</b>	<b>2906</b>	<b>54</b>	<b>243</b>	<b>149</b>	<b>1790</b>	<b>336</b>	<b>511</b>	<b>77</b>	<b>77</b>	<b>77</b>	<b>58</b>	<b>17416</b>	<b>461</b>	<b>6358</b>	<b>813</b>	<b>7632</b>	<b>402</b>	<b>804</b>	<b>1464</b>

		LANDLORD TENANT CALLS																									
		Income				Race																					
		Very Low	Low	Moderate	High	Total	White	Black	Hispanic	Asian	Black & White	Other	Black & Hispanic	American Indian or Alaskan	Pac Islander	Native American White	Asian & White	Asian & Latino	Other & Latino	American Indian/Alaskan & Hispanic	Hispanic	American Indian/Alaskan	Native, Black & Hispanic	Other Multi Race Non-Hispanic	Unknown/Other Multi Race/Non Hispanic on 9902)	Total	
FY08-09	342	1719	736	11	2808	1490	362	907	8	10	13	0	0	0	17	1	0	0	0	0	0	0	0	0	0	0	2808
FY09-10	528	1279	489	91	2387	974	281	1058	28	6	26	2	5	2	0	0	7	0	0	0	0	0	0	0	0	0	2387
FY10-11	1960	1762	548	190	4460	2117	610	1597	23	8	23	1	25	1	0	0	4	5	9	0	0	0	1	17	20	4460	
FY11-12	1968	1228	453	172	3821	1684	593	1381	68	10	0	9	6	11	9	0	5	4	9	0	0	0	0	7	34	3821	
FY12-13	1653	1460	594	233	3940	1815	589	1406	29	2	8	3	3	12	3	0	0	0	30	5	5	0	0	17	21	3940	
<b>TOTAL</b>	<b>6451</b>	<b>7448</b>	<b>2820</b>	<b>697</b>	<b>17416</b>	<b>8080</b>	<b>2435</b>	<b>6349</b>	<b>156</b>	<b>36</b>	<b>70</b>	<b>29</b>	<b>39</b>	<b>26</b>	<b>29</b>	<b>1</b>	<b>16</b>	<b>9</b>	<b>48</b>	<b>5</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>41</b>	<b>75</b>	<b>17416</b>	



Table II-8 presents data regarding the total number of landlord/tenant inquiries or “complaints” received by the FHCRC between July 2008 and June 2013 and the ultimate disposition of those complaints going beyond mere information dissemination. When a comparison is made of cases referred for legal services, approximately 6,358 of the complaints were ultimately counseled and/or recommended for referral to another agency or an attorney. Lastly, cases mediated countywide totaled approximately 461 of all complaints filed between July 2008 and June 2013.

b. Discrimination Complaints

Complaints relating to housing discrimination involve alleged violations of both state and federal fair housing laws as they apply to the rental and purchase of housing units. Under these laws, housing consumers cannot be treated unfairly or differently based on race, disability, familial status (i.e. presence of minor children), sex, national origin, color, source of income, sexual orientation, religion, marital status, age, or other arbitrary factors. When housing discrimination complaints based on one or more of these categories are received, the FHCRC will attempt to seek a resolution. If efforts to resolve a case are unsuccessful and the supporting documentation appears to be weak, the case is given to the State Department of Fair Employment and Housing (DFEH) for further investigation.

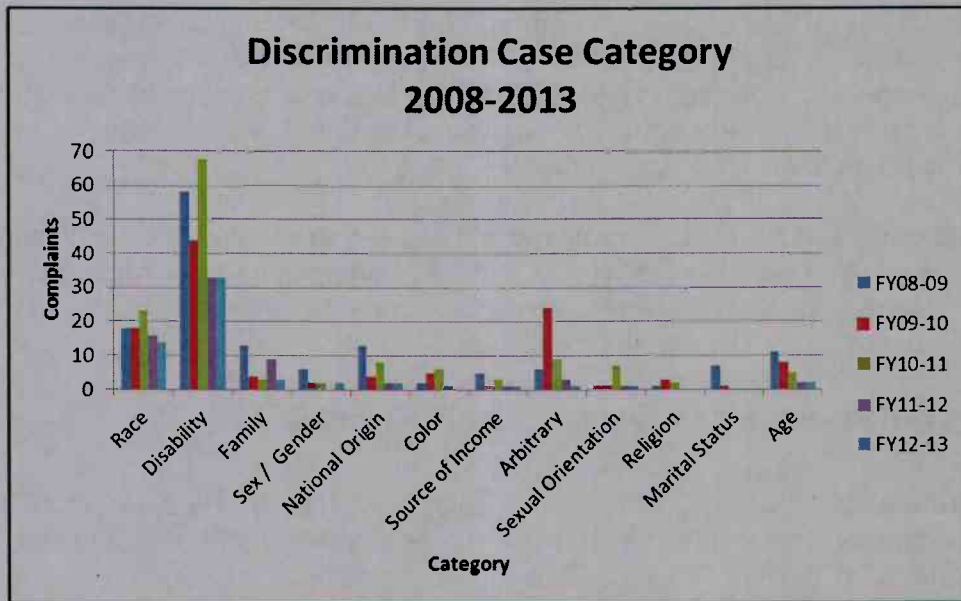
**Table II-9**

Discrimination Complaints 2008-2013													
	Race	Disability	Family	Sex / Gender	National Origin	Color	Source of Income	Arbitrary	Sexual Orientation	Religion	Marital Status	Age	Total
FY08-09	18	58	13	6	13	2	5	6	1	1	7	11	141
FY09-10	18	44	4	2	4	5	1	24	1	3	1	8	115
FY10-11	23	68	3	2	8	6	3	9	7	2	0	5	136
FY11-12	16	33	9	0	2	1	1	3	1	0	0	2	68
FY12-13	14	33	3	2	2	0	1	1	1	0	0	2	59
<b>Total</b>	<b>89</b>	<b>236</b>	<b>32</b>	<b>12</b>	<b>29</b>	<b>14</b>	<b>11</b>	<b>43</b>	<b>11</b>	<b>6</b>	<b>8</b>	<b>28</b>	<b>519</b>

Table II-9 examines twelve categories of housing discrimination monitored by the FHCRC. The data presented covers a five-year time period and includes the unincorporated part of the County and CDBG cooperating cities. The FHCRC logged records of discrimination complaints by the city of origin in the intake process. Since 2004 The FHCRC has been tracking discrimination complaints emanating from CDBG cooperating cities by city of origin.

An examination of the data in Table II-9 indicates that discrimination falling under the separate categories of race, family status, and disability violations comprised of 16%, 8%, and 47% of the complaints, respectively, or 71% of the total complaints received during the aforementioned five year span (2008-2013).

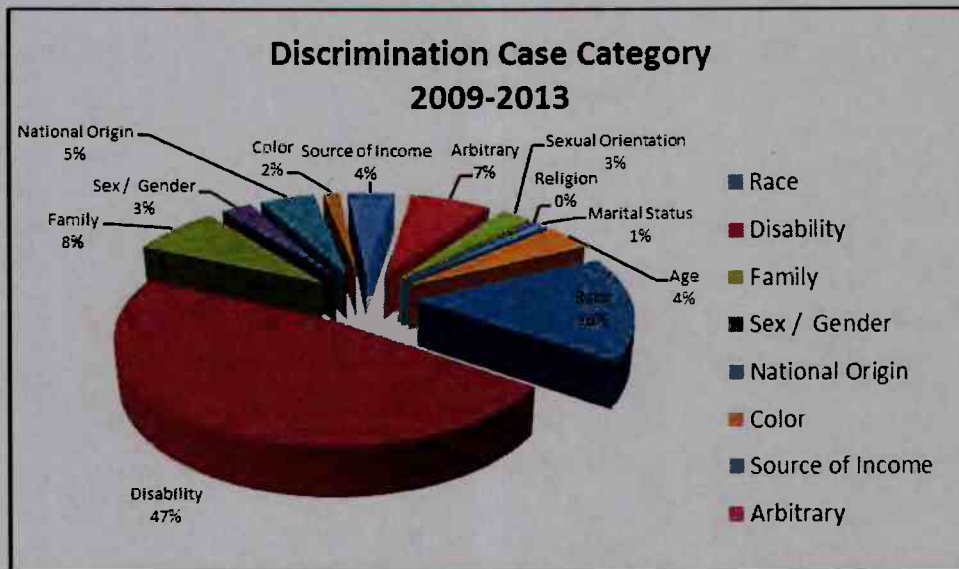
Figure 2



Figures 2 and 3 give a pictorial representation of each complaint category for the past five years.

While in the 2009 Fair Housing Study race was not the highest category of complaints in the last several years, it is cited as the second highest complaint for the past five years. As identified in Figure 3, disability continues to be the leading discrimination complaint for the current reporting period.

Figure 3



Family status category was cited as the third most complaint received in three out of four year time span. Despite efforts to educate and mitigate, the problem appears to be an ongoing issue. This category was among the top three complaints cited in the past two years and is the number three complaint category received in the four-year time span. The increased outreach by FHCRC to the public is a major factor in educating the public. However, with the tight housing market and lack of affordable large housing units, it remains a challenging environment.

An evaluation of additional data provided indicates that a total of 519 discrimination complaints were filed with the FHCRC. Of the 519 complaints filed, approximately 403 were conciliated, 115 were referred to either a private attorney, HUD-or DFEH for further action, and 1 case is pending resolution.

## **2. Countywide Complaints Received by HUD and DFEH**

The Department of Housing and Urban Development (HUD) continues to receive fair housing discrimination complaints that cannot be resolved at the local level through organizations such as the FHCRC. The number and type of countywide complaints initially received by the Fair Housing Council of Riverside County and which were subsequently forwarded to HUD are included in Table II-9. The figures cover the time period from 2008 to 2013. Countywide complaints include complaints originating in jurisdictions that are non-cooperating (CDBG) cities as well as those originating in cooperating cities and unincorporated county areas. As can be seen, alleged discrimination based on the categories of disability, race, and family status drew the highest number of complaints.

## **SECTION III IMPEDIMENTS TO FAIR HOUSING CHOICE**

### **A. OBTAINING HOUSING**

#### **1. Real Estate Practices**

The primary methods of acquiring owner-occupied housing in Riverside County are purchases of existing homes through licensed real estate agents and purchases in new home developments. Some housing is also sold through auctions and directly from seller to buyer without a licensed real estate agent. Licensed real estate agents handle most resale housing purchases, although some new housing developers use local real estate agents rather than setting up their own sales offices. Licensed real estate agents also represent some buyers at auctions. New home developments usually establish a sales office on-site and employ their own licensed sales agents.

The California Bureau of Real Estate (CalBRE) licenses real estate agents as either real estate salespersons or real estate brokers. Real estate salespersons must successfully complete three college-level courses, which includes a course in Real Estate Principles and Real Estate Practice and pass a CalBRE-administered examination in order to become licensed. Salespersons renewing an original license must complete 45 clock hours of CalBRE-approved continuing education courses.

Fair housing is one of the topics mandated by CalBRE in the Real Estate Principles class; in addition, there is a fair housing continuing education requirement. Most real estate agents also join the California Association of Realtors® and are thus entitled to use the Realtor® designation. Real estate salespeople must work under the direction of a licensed real estate broker. Real estate brokers must take eight college-level courses covering various aspects of real estate and pass a broker exam administered by CalBRE, as well as additional continuing education courses for license renewal.

Real estate brokers and offices are generally members of a local board or association of realtors. The local board or association typically runs a Multiple Listing Service (MLS), which lists properties for sale. Properties can only be entered into the MLS by members, thus limiting participation to properties that have been listed for sale by a real estate broker, or by a salesperson under the direction of a broker. Most resale homes in Riverside County are sold through real estate offices, utilizing the MLS.

Most real estate agents work on a commission basis; typically, the commission is paid by the seller out of the proceeds of the sale. The buyer and seller may have the same agent (dual agency), or they may have separate agents. Due to this structure, the real estate agent typically works for the seller rather than the buyer. In new home developments, unless the builder is allowing broker participation, the agent is working for the seller and not the buyer. This is important to note, as the buyer's interests may not be fully protected in a dual agency transaction.

## **2. Sale and Rental of Housing**

Housing for rent in Riverside County may be offered in one of several ways: through a property management company; through an on-site rental office; through a real estate office; or directly by the owner. In all cases, the person or firm offering the property for rent is working on behalf of the owner and representing the owner's interests, and not that of the prospective tenant.

In all situations where the property owner engages another party to offer the property for rent, the person or firm providing this service must be licensed by the Department of Real Estate as a property manager or real estate broker. As noted previously, the CalBRE's licensing process includes some education on fair housing issues. In cases where the owner is offering the property directly, the owner is not required to be licensed and may not be aware of fair housing requirements. Violations of fair housing practices may occur due to lack of awareness, misunderstanding, or the commission of intentional acts.

## **3. Fair Housing Audit Update**

During the 2013/2014 fiscal year, The Fair Housing Council of Riverside County was contracted to conduct an audit to determine the existence of discriminatory practices in the sale and/or the housing rental markets within targeted county areas. Testing was conducted in the following cities: Coachella, Jurupa Valley, Lake Elsinore/Lakeland Village, San Jacinto, and Cabazon.

The primary purpose of the 2014 Fair Housing Audit, included in Appendix B in its entirety, was to detect possible discriminatory practices against Race, Disability, Familial Status, or National Origin. Four basic categories are utilized to determine any marked area of difference: (1) Availability, (2) Terms & Conditions, (3) Tenant Qualifications, and (4) Courtesy/Overall Contribution.

As a result of the audit, several new impediments were identified and as such, the 2009 Analysis of Impediments Matrix is being amended so that the Economic Development Agency (EDA) and Fair Housing Council of Riverside County address these impediments over the course of the next Consolidated Plan period.

## **4. Publicly Assisted Rental Housing**

The Housing Authority of the County of Riverside (HACR) administers the Housing Choice Voucher Program (Section 8) for Riverside County and currently operates tenant based rental assistance programs serving low income, homeless, and veteran clients in eastern and western Riverside County. The HACR also currently administers 48 Project-Based Vouchers.

Courtesy Rental Listings are offered through GoSection8.com, which gives the family access to owners who wish to rent their properties to recipients of the program. Property owners, managers, and agents are given notice that they have a responsibility and a

requirement under the law not to discriminate in the advertising or rental of property on the basis of race, color, religion, sex, handicap, familial status, or national origin. The Housing Authority also conducts quarterly Owner Seminars where owners and landlords are given information regarding the Section 8 program. A packet is provided that includes Fair Housing information and a referral to the FHCRC for further information and assistance. The Fair Housing Council provides services to both landlord and tenants, and also hosts educational workshops on their rights and responsibilities under Fair Housing laws.

According to RealtyTrac®, in January 2014 the number of properties that received a foreclosure filing in Riverside County was 12% higher than the previous month and 11% lower than the same time last year. Although less common than in previous years, landlords with properties in pre-foreclosure status will reduce their rent to gain occupancy. However within a few months, families find themselves in jeopardy of losing their security deposits and having to relocate. The Housing Authority's efforts to run foreclosure activity reports prior to issuing an owner ID, have been successful in catching those already in the foreclosure process. Nevertheless, there have been some that have defaulted after Section 8 participants have moved into their properties. This has been especially difficult on the families that now have to be uprooted.

Another concern is landlords with higher end mortgages are unable to accommodate the Housing Authority payment standards and cannot lease out their properties to Section 8 participants. These owners typically are investors and as property values return, investor interest cools off. This may affect the number of properties available and affordable to Section 8 tenants.

## **5. Financing: Evaluation of Home Mortgage Disclosure Act Reports and CRA Ratings**

The Home Mortgage Disclosure Act (HMDA) Reports and Community Reinvestment Act (CRA) Public Evaluations were evaluated for lenders operating in Riverside County, in order to assess local lending practices and identify obstacles in obtaining home loans.

EDA analyzed 2012 HMDA data for owner-occupied loans to determine existence of disparate lending practices based on race, and to identify the primary reasons given for denial of a loan. The findings of the analysis are shown in the following tables. Table III-1 provides information on loan origination and denial rates by type of loan while Table III-2 is regarding denial rates by race and ethnicity, and Table III-3 is concerning denial rates by income. Table III-4 provides reasons for denial of loans.

**Table III-1**

LOAN ORIGATION AND DENIAL RATES BY TYPE OF LOAN								
Type of Loan	Number Originated	Percent Originated	Number Approved But Not Accepted	% Approved But Not Accepted	Number Denied	Percent Denied	Number Closed, Withdrawn or Incomplete	% Closed/Withdrawn/Incomplete
FHA/FSA/RHS/VA Purchase Loans	13,140	20.5	870	18.1	2,816	15.9	2,595	15.8
Conventional Purchase Loans	6,957	10.8	678	14.1	1,488	8.4	1,583	9.6
Refinance Loans - Owner Occupied	43,192	67.3	3,086	64.3	12,033	68.2	12,073	73.4
Home Improvement Loans - Owner Occupied	865	1.3	169	3.5	1,311	7.4	204	1.2
Total	64,154		4,803		17,648		16,455	
Source: 2012 HMDA Data								

As illustrated in Table III-2, White applicants had the highest loan origination rate at 29.2%, followed by Asian applicants (4.2%), Black applicants (2.6%), Joint White/Minority (1.3%), and Race Not Available (0.7%). Not Hispanic or Latino applicants had a loan origination rates of 38% while Hispanic or Latino applicants had rates of 15.5%. When the loan origination rate is shown relative to the percentage of applicants by race, White applicants and Not Hispanic or Latino were approved in higher proportions, and Black, Hispanic or Latino, and Race Not Available applicants were denied in higher proportions.

**Table III-2**

<b>LOAN ORIGATION AND DENIAL RATES BY RACE AND ETHNICITY</b>					
<b>Race of Applicant</b>	<b>Loans Originated</b>	<b>Loan Origination Rate</b>	<b>Applications Denied</b>	<b>Loan Denial Rate</b>	<b>Withdrawn, Not Accepted, Closed or Incomplete Loans</b>
American Indian/Alaskan Native	245	0.5%	55	0.4%	37
Asian	2,066	4.2%	627	4.2%	520
Black	1,269	2.6%	459	3.1%	409
Native Hawaiian/Other Pacific Islander	180	0.4%	53	0.4%	60
White	14,259	29.2%	3,868	25.8%	3,677
Two or More Minority Races	19	0.04%	6	0.04%	6
Joint (White/Minority Race)	628	1.3%	149	1%	132
Race Not Available	365	0.7%	132	0.9	153
Hispanic or Latino	7,570	15.5%	2,572	17.2%	2,157
Not Hispanic or Latino	18,548	38%	5,194	34.6%	4,856
Joint (Hispanic or Latino/Not Hispanic or Latino)	133	0.3%	35	26.3%	33
Ethnicity not Available	3,529	7.2%	1,841	12.3%	1,730
<b>Total</b>	<b>48,811</b>		<b>14,991</b>		<b>13,770</b>

Source: 20012 HMDA Data



**Table III-3**

<b>LOAN ORIGATION AND DENIAL RATES BY INCOME</b>						
<b>Income of Applicant</b>	<b>Number of Originating Loans</b>	<b>Loan Origination Rate</b>	<b>Number of Loan Denials</b>	<b>Loan Denial Rate</b>	<b>Other*</b>	<b>Other*</b>
Less than 50% of Median	617	1%	278	1.6%	196	1.2%
50-79% of Median	7,292	11.4%	2,552	14.5%	2,156	13.1%
80-99% of Median	9,760	15.2%	2,899	16.4%	2,564	15.6%
100%-119% of Median	9,652	15.1%	2,602	14.8%	2,485	15.1%
120% or More of Median	36,822	57.4%	9,299	52.7%	9,036	54.5%
<b>Total</b>	<b>64,143</b>		<b>17,630</b>		<b>16,437</b>	
Source: 2012 HMDA Data						
* The loans listed under "Other" were withdrawn, not accepted, closed or incomplete.						

**Table III-4**

Applicant Characteristics	REASONS FOR DENIAL OF LOANS											Unverifiable Info	Actual Cases	Credit App. Incomplete/Mortgage Insurance Denied	Number	Other		
	Actual Cases	Debt/Income Ratio	Actual Cases	Empl. History	Actual Cases	Credit History	Actual Cases	Collateral	Actual Cases	Insuff. Cash	Actual Cases						PERCENTAGE	
<b>RACE</b>																		
American Indian/Alaskan Native	4	13%	0	0%	12	39%	2	6%	0	0%	0	0%	0	0%	5	16%	8	26%
Asian Nat	138	27%	9	2%	88	17%	73	14%	11	2%	42	8%	64	13%	64	13%	83	16%
Hawaiian/Other Pacific Islander	8	20%	0	0%	11	28%	4	10%	2	5%	4	10%	2	5%	2	5%	9	23%
Black	83	23%	2	1%	123	35%	42	12%	8	2%	16	5%	32	9%	32	9%	49	14%
Hispanic	570	27%	38	2%	503	24%	234	11%	69	3%	152	7%	276	13%	276	13%	295	14%
White	727	23%	24	1%	617	19%	599	19%	65	2%	180	6%	488	15%	488	15%	520	16%
Joint (White/Other Race)	22	17%	2	2%	26	20%	26	20%	1	1%	10	8%	17	13%	17	13%	26	20%
Race Not Available	30	28%	0	0%	20	19%	18	17%	2	2%	5	5%	14	13%	14	13%	19	18%
<b>INCOME</b>																		
Less than 50% of Median	45	30%	3	2%	31	21%	24	16%	6	4%	10	7%	20	13%	20	13%	11	7%
50-79% of Median	302	25%	16	1%	277	23%	178	14%	39	3%	64	5%	162	13%	162	13%	193	16%
80-99% of Median	362	26%	15	1%	295	21%	225	16%	34	2%	77	5%	193	14%	193	14%	211	15%
100-119% of Median	311	25%	11	1%	274	22%	180	14%	35	3%	81	7%	160	13%	160	13%	192	15%
120% or More of Median	1,134	30%	40	1%	754	20%	508	13%	66	2%	212	6%	524	14%	524	14%	538	14%
Income Not Available	5	31%	0	0%	3	19%	4	25%	2	13%	1	6%	1	6%	1	6%	0	0%

Source: 2012 HMDA Data

## **B. PUBLIC POLICIES AND ACTIONS**

### **1. Background**

The 2009 Fair Housing Impediments Study included review of public policy documents for fifteen CDBG Cooperating Cities. This Fair Housing Impediments Study is an update, and reviews public policy and documents related to goals, policies, and programs for the current 13 cooperating cities. The previous study looked at the resources that were available to provide affordable housing opportunities and reviewed any restrictions that would exclude the development of affordable housing. An Annual Planning Survey conducted in 2011 by the Governor's Office of Planning and Research (OPR) provides the latest information on local planning activities and the status of local General Plans.

This study examines the impact of the dissolution of Redevelopment that was the primary source of funds for affordable housing, explores other available resources that provides affordable housing opportunities, and reviews any restrictions that would impede the development of affordable housing. The County of Riverside conducted several Community Participation Meetings in selected unincorporated areas of the County and utilized a comprehensive on-line needs assessment survey to assist in the identification of community, housing, and social needs in the County's low- and moderate-income communities to determine the best way to address these needs. This study also reviews the housing, density, and infill of jurisdictions in the County of Riverside, whether specific areas were identified, and where they can be found (Housing Element, Land Use Element, and/or Zoning Code).

On June 28, 2011, Governor Brown signed Assembly Bill No. x1 26 ("ABX1 26"), the bill to dissolve redevelopment agencies throughout the State of California. On December 29, 2011, the California Supreme Court announced its decision to uphold ABX1 26, thus eliminating redevelopment agencies. As previously mentioned, the primary resources for affordable housing were redevelopment funds and the availability of land designated for residential development. The redevelopment agencies for the cities were successful in the production and preservation of affordable housing. Since the dissolution, cities have struggled to meet the need for affordable housing.

On January 10, 2012, all housing functions previously performed by the former Redevelopment Agency (RDA), including related rights, powers, duties, obligations, and housing assets were transferred to the Housing Authority of the County of Riverside. As Housing Successor, the Housing Authority is responsible for managing the wind down of redevelopment projects currently underway, make payments identified on the Enforceable & Recognized Obligation Payment Schedules (EOPS and ROPS), and dispose of redevelopment assets and properties as directed by the Oversight Board.

The Cooperating Cities are assisted through the County's First Time Homebuyer programs for the very low- and low-income families. Single-family rehabilitation or new construction projects continue to be funded through grants and loans. Developers are

assisted through the Riverside County Economic Development Agency for the creation of multi-family units and single family homes.

## **2. Zoning Ordinances**

The potential for any significant impediment to fair housing was determined through an assessment of the public policies, programs, and zoning ordinances in relation to the community's uniqueness. The zoning ordinance for each jurisdiction was reviewed for restrictive and excessive development standards or governmental constraints that can be impediments to fair housing affecting affordable housing developments. The zoning ordinance complies with the amount of density and type of housing developed through the land use designations in the Land Use Element.

The housing programs of the various jurisdictions were reviewed along with zoning requirements and the cities' accomplishments regarding affordable housing. State law requires that the zoning ordinances must be consistent with the general plan. Although "restrictive and excessive development standards implemented through zoning ordinances" can be impediments to fair housing limiting the affordability and housing choice, there were a number of minor regulatory constraints to the further development of affordable housing that were observed:

### **a. Minimum Standards**

- The County and cities set minimum floor space standards for multifamily and single family projects. For example, the City of Norco has included minimum multifamily floor standards from 750 square feet for an efficiency unit, to 1,000 square feet for a single-family dwelling that has two bedroom or less, and 1,300 square feet for all other single-family dwellings in a residential zone. The City of Blythe uses a broader standard in which an efficiency unit is 400 square feet where single family and/or multifamily projects can exist in any residential zone, except industrial or commercial.
- The City of Norco continues to indicate in their zoning ordinance an R-3 low-density designation with a maximum density for single family of 8 dwelling units per net acre requires a minimum of 600 square feet of open space to be allocated for each unit constructed. An additional two hundred (200) square feet of Usable Open Space is required for each bedroom over one in the dwelling unit.
- Desert Hot Springs requires that multifamily projects provide amenities such as a swimming pool, spa, tot lot with play equipment, or picnic shelter depending on the number of units within a multi-family project; however, these amenities, along with open space requirements, can add to the cost of discretionary items by the Planning Commission.
- The Cities of Banning, Beaumont, and Blythe have developed polices for congregate care and accessibility requirements for the physically disabled in the

general plan, but do not have specific regulations for the development of accessible units in their zoning ordinance. The Cities of La Quinta, Norco, and San Jacinto have restrictions for senior housing in their zoning ordinance.

- The City of Indian Wells' zoning ordinances does not discuss fair housing, nor are there any rules concerning the demolition of residential units.
- The City of Canyon Lake's zoning standards were last updated in 1996, however, standards may have changed. Currently, incentives for affordable housing seems to be lacking and does not seem to include or discuss density bonuses, inclusionary rules or fees, and fast tracking or streamlining procedures.

b. Density Bonus

Cities are required by the state to adopt a density bonus program for low-and-moderate developments, which restrict their units to very low, low or moderate-income households. Cities shall allow a density bonus of 25% over the underlying zoning designations. Multifamily complexes and senior units were developed granting density bonuses in which units were for handicapped residents. For example, the Planning Department for the County addressed the density program as a policy issue on a case-by-case basis through the R-6 (Residential Incentive) Zoning.

According to the survey, the city of Desert Hot Springs has adopted financial incentives to encourage lot consolidation for smaller infill parcels. Most other cities encourage lot consolidation by adopting Density Bonuses. Higher densities permit more intensive development of a parcel and allow the developer the opportunity to spread development costs over more units, thus increasing the availability of affordable housing.

c. Mobile Homes

Since the California Legislature has indicated a need to eliminate the differences between mobile home development and conventional forms of residential land use, and has enacted Section 65852.7 of the Government Code and amended Section 18300 of the Health and Safety Code to permit mobile home parks in residential zones, most cities allowed mobile home developments in other areas designated for residential zoning. The Cities of Banning, La Quinta, Murrieta, Norco, and Wildomar do not permit mobile home parks in other residential zones unless a conditional use permit is approved.

#### d. Fair Housing

The Cities of Beaumont, La Quinta, and Norco discuss fair housing issues in their zoning ordinance. Only the Cities of Canyon Lake and Desert Hot Springs do not reference fair housing issues in their zoning ordinances.

### **3. General Plans**

The Governor's Office of Planning and Research has conducted the Annual Planning Survey for over 20 years and the 2011 results were published in the Annual Planning Survey Results 2012. The survey provides the latest information on local planning activities and the status of local General Plans. At the time of publication, the cities of Canyon Lake, Desert Hot Springs, and Lake Elsinore indicated that they were undergoing an update of one or more of General Plan Elements and were expecting to be completed by 2011. Banning, Coachella, Hemet, Indian Wells, and Perris expected to be completed with updating their General Plan in 2012, while Calimesa expected completion in 2014.

Jurisdictions within the County of Riverside that have identified specific areas for infill development were Beaumont, Calimesa, Corona, Desert Hot Springs, Hemet, Indio, Palm Springs, Perris, Riverside, San Jacinto, and Temecula. The cities identified these areas for infill development in their Housing Element, Land Use Element, and/or Zoning Code. The infill development in the cities of Indio and Temecula were identified in their Specific Plan. To promote or facilitate infill development, these jurisdictions have adopted the following types of policies and/or procedures: density, height, and other bonuses; expedited permit processing; infill and specific plan; and/or reduced parking requirements.

The cities of Banning, Beaumont, Blythe, Canyon Lake, Coachella, Corona, Desert Hot Springs, Hemet, Indio, Menifee, Moreno Valley, Murrieta, Palm Springs, Riverside, and San Jacinto adopted policies and/or programs that promote access to regular transit service connecting residential, employment, and commercial areas across their jurisdictions. These policies and programs are integrated in the jurisdiction's Circulation Element, Land Use Element, Transportation Plan, or other documents such as the Specific Plan. Developing affordable housing in proximity to existing transit routes can reduce transportation and housing costs for low-income families. It also reduces auto use and accompanying congestion and pollution.

### **4. Barriers**

Within the territory of the County there are highly diversified areas that consist of high density urbanized areas and also lower density rural areas. However, the need for affordable housing remains at-large throughout the entire County. Within the vast areas of the County there are several barriers to the production of affordable housing. The 2011 Annual Planning Survey included information from jurisdictions explaining the primary barriers experienced to implementing infill projects.

a. Infrastructure

The need for affordable housing remains large in rural areas of the County. The rural areas employ a significant number of low-income households. However, the need to fulfill the affordable housing need in these areas is strongly hindered by the lack of infrastructure. Coachella and Moreno Valley reported infrastructure constraints as a primary barrier to implementing infill projects. The Coachella Valley Water District which is the main source of water supply in these areas completed a domestic water hydraulic modeling study which showed that in certain areas of the Eastern Coachella Valley the demand for housing exceeds the areas' water supply.

b. Lack of Funding

Coachella, Indio, Norco, and Palm Springs reported lack of funding as a barrier to infill housing. At the time of the survey, all proposed projects in Norco needed a reduction of fees or other forms of financial assistance from the City which they were not in a position to do. Coachella specifically indicated the cost of development and lack of future tenants in the narrative answers.

c. Dissolution of Redevelopment Agencies

The City of Norco, which is persistent in preserving its historical animal keeping and small plot agriculture zoning, is reaching build-out condition in its residential zones. There is little land available for the construction of new units in any substantial numbers. The City had been using its redevelopment funds, and various state and federal funds, to preserve existing housing stock at price levels affordable to very low and low-income households. Coachella has also indicated the loss of redevelopment tools as a barrier to implementing infill projects. Since the dissolution of the Redevelopment Agencies, cities struggle to meet the need for affordable housing.

d. Personnel

Although Lack of Staff Resources was included as a barrier in the Survey, no jurisdictions in the County of Riverside reported it as having been experienced.

**5. Housing Programs**

All cooperating cities, utilize the County's housing programs.

**6. Evaluations of Housing Element Goals and Policies -Observations**

The following observations can be made in relation to the issues of affordable housing:

a. Regular Density Analysis

- Density is a critical factor in the development of affordable housing. Affordable housing tends to be developed at the highest density range. In the current

economic state where funds have diminished maintaining lower costs to the development of affordable housing is critical. Overall, maintaining higher density lowers the per unit land cost.

- Several cities have large land areas that are needed for substantial residential growth in which there are a wide range of housing types and densities. For instance, in the County's R-HD zoning designation (Residential High Density), more multifamily projects can be built in comparison to a low-density residential zoning for single family homes. The R-HD zoning designation then becomes an impediment to the development of affordable single family housing. The end result is that fewer affordable single family homes will be built.
- Since the need for affordable housing is recognized as a significant housing problem in the County of Riverside, the County has established the R-6 zone as a residential incentive that allows flexibility in the density based on the physical and service constraints in the area. In the past the County has utilized R-6 zoning on two projects and is currently reevaluating the process to increase its effectiveness.

b. Special Needs Policy/Program

The Comprehensive Housing Affordability Strategy (CHAS) data, based on the 2006 – 2010 ACS, was developed by the U.S. Census Bureau for HUD. The County of Riverside's Housing Needs were determined by analyzing the housing problems by income levels, levels of cost burdened, severe housing problem and households with special needs. The data used was derived from the CHAS.

Necessary assistance for the special needs populations, such as disabled and senior households, was identified based on the CHAS tables as well as the number of senior citizens on the HACR's waiting list for Section 8 or Public Housing. In the past, the cities received assistance through the County's Economic Development Agency, which provided CDBG funds for an Enhanced Senior Home Repair Program. RDA and CDBG funds were provided for the Home Rehabilitation Program available for qualifying residents in the unincorporated areas or within the Cooperating Cities' limits. Redevelopment was the primary source of funds for affordable housing for many cities and the County.

The CHAS data analyzes households with one or more housing problems, such as overcrowding, lacking adequate housing facilities (kitchen or plumbing), and those experiencing cost burden, which is paying more than 30% of household income for housing.

In the past, cities typically allocated their set-aside funds from the Redevelopment Agencies for programs to meet State-mandated affordable housing needs and to expand housing opportunities. Agencies such as the County of Riverside Community Action Partnership (CAP) and other non-profit organizations still offer some type of home repair assistance. CAP administers the Weatherization Program that helps



low-income households make their homes more energy efficient. Funding is provided by federal LIHEAP and the Department of Energy.

## **7. Bond Financing**

Bond financed projects with affordability restrictions have a limitation on the number of years the affordability restrictions can remain in place. Early pay off of the project financing can be a potential impediment and have a significant impact on the availability of affordable housing within the community. Cities have tried to implement affordability restrictions with the longest feasible time. Potential investors interested in purchasing existing low-income housing developments and/or developers exploring the fiscal attributes of building low-income housing are often deterred by long-term affordability restrictions. They see these restrictions as a bad investment in that it limits their ability to sell or modify the housing units over the long term.

## **8. Taxation**

Potential factors that pose a constraint on affordable housing and create a potential impediment to fair housing along with property taxes are utility users taxes. In conjunction with high property taxes, which increase monthly payments and make monthly payments unaffordable and prevent very low and low income homeowners from purchasing a home or maintaining an apartment, taxes on utilities is a minor constraint; however, it is a potential impediment to affordable housing. Out of the 13 cooperating cities surveyed, only three cities have imposed a utility tax. The City of Desert Hot Springs imposes a 7% utility tax while the Cities of Beaumont and Indio have a utility tax of 3%. In November 2008, the City of Indio Utility Users Tax, Measure K resulted in a yes vote to extend the tax to include additional utilities, particularly communication technologies such as T-lines. According to their 2013 Budgetary Analysis Report, the City of Desert Hot Springs is considering modernizing and expanding the utility users tax to cover utilities not currently included. The County, in an effort to reduce any restraints for affordable housing, attempts to keep taxes in the unincorporated areas to a minimum and does not have a tax on utilities.

## **C. HOUSING PROGRAM ADMINISTRATIVE POLICIES**

### **1. Housing Authority**

The Housing Authority of the County of Riverside is subject to Title VII of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, the Rehabilitation Act of 1973 and Age Discrimination Act of 1973 and the HUD regulations promulgated pursuant to those laws.

All documents related to Nondiscrimination in Housing have been approved and comply with the requirements by HUD and therefore are not considered an impediment to fair housing.

## **2. Community Development Block Grant (CDBG)/Home Investment Partnerships (HOME) Programs**

### **a. CDBG Program Contract Format**

The "Sponsor's Agreement" for the Use of Community Development Block Grant Funds was submitted by EDA in the previous study, was approved, and is in compliance with all laws and regulations.

The contract utilized for Cooperating Cities is called a "Supplemental Agreement for the Use of Community Development Block Grant Funds." This agreement was addressed in the previous study, approved, and is in compliance with federal requirements for nondiscrimination.

### **b. HOME Program Contract Format**

The County continues to use HOME agreements which specify the responsibilities of applicants pertaining to fair housing law.

## **3. Complying Programs/Non-Impediments**

The following items were omitted in this study since the documents and agreements have been approved by HUD and are not considered impediments:

### **a. Emergency Solutions Grant Program**

Contract Format for the Use of Emergency Solutions Grant Funds: All recipients must consult with the Continuum(s) of Care operating within the jurisdiction in determining how to allocate ESG funds. Riverside County may sub grant ESG funds to private nonprofit organizations. The recipient and its sub recipients must document their compliance with the nondiscrimination and equal opportunity requirements.

### **b. Fair Housing Outreach: CDBG Grantee and Service Recipients**

FHCRC has an extensive outreach program that includes, but is not limited to, educational workshops, technical training programs, and general public awareness activities. Aside from providing technical assistance to the general public, FHCRC is called upon to train the real estate and lending industry, and governmental agencies on fair housing practices.

Public Awareness. FHCRC's mission is to educate the public of their services and issues regarding fair housing laws. Not only is this accomplished through the print-media/web-site/public television and radio, but through direct visibility within the community – community meetings, activities, non-profit events, and holding a seat on different commissions and boards throughout the County. Their tireless efforts have included, but not been limited to, the following:

- Home Buyer Seminars were held throughout the County to equip home buyer customers with the necessary skills needed to purchase a home.
- Keep Your Home California foreclosure prevention programs to provide assistance to homeowners undergoing a documented, eligible hardship.
- Participation in the HUD Mobile Home Park Review Committee meetings to address major owner/tenant issues.
- FHCRC's staff, display, and marketing materials (English/Spanish) are found wherever a community/city is holding an event.

Technical Training Programs. FHCRC conducts comprehensive Fair Housing Training Workshops for real estate, mortgage lending and insurance industries, non-profits, and government agencies. Topics covered are: State and Federal Fair Housing Laws, Discriminatory Policies and Practices, Non-Discriminatory Advertising, and Servicing Seniors and the Disabled.

Educational Workshops. Workshops are an integral part of all public education activities provided by FHCRC. Through the Council's experience, they have discovered this provides the presenter and the participant an opportunity to learn about specifics, ask questions, and meet one-on-one for personal assistance. FHCRC generally incorporates this into their activity venue.

## **D. SUMMARY OF IMPEDIMENTS TO FAIR HOUSING**

### **1. Background**

It is the goal of the County of Riverside to eliminate any existing and (to the maximum extent possible) prevent future housing discrimination and other impediments to equal housing opportunity within the unincorporated County as well as in all 13 CDBG Cooperating Cities. To help make this objective a reality, the County has contracted with FHCRC to provide fair housing services to the unincorporated portion of the County and the Cooperating Cities.

FHCRC is a nonprofit corporation that maintains offices in the Cities of Riverside, Corona, Moreno Valley, and Palm Springs. It provides services to the County and the aforementioned cooperating cities through the following activities: education and outreach (workshops, seminars, and presentations) relating to fair housing laws; training, technical assistance, and testing, such as the testing conducted for and described in this report, to ensure compliance with fair housing laws; processing of housing discrimination complaints; resolution of landlord/tenant disputes; and ensuring that the rights of those who are victims of housing discrimination are enforced through the California State Department of Fair Employment and Housing and/or the U.S. Department of Housing and Urban Development.

a. Financial Plan

Fair housing services are provided by FHCRC to the County and the Cooperating Cities through a contract that is subject to renewal on a yearly basis. The County contracts for the provision of all services required for compliance with all federal and state programs and laws affecting fair housing in the unincorporated County as well as the 13 CDBG cooperating cities. Fair housing services are paid for through the CDBG program.

FHCRC's most recent contract with the County (for Fiscal Year 2013/2014) is in the amount of \$129,716. While the exact amount of funding available for future fair housing services cannot be predicted in advance, the County will continue to provide for such services to the greatest extent that it is financially possible.

b. Future Updates

It is anticipated that any future revisions of the 2014 Fair Housing Impediments Study will continue to follow the time frame of the County's Consolidated Plan (a five year strategic plan). Thus a major update of data contained in the Study could be expected in the year 2018, when the next Consolidated Plan is scheduled for preparation. However, changes in actions to eliminate current impediments and prevent future impediments to fair housing should be implemented, as needed, on a yearly basis. Such changes should be based on the results of testing and other program strategies and objectives assigned to and accomplished by FHCRC. Changes in strategies and/or program objectives should be incorporated into the renewal of FHCRC's contract at the beginning of each year.

## 2. Summary of Impediments

Illegal discrimination is not always overt and can be empirically difficult to prove. The mere filing of a complaint alleging housing discrimination neither proves nor disproves the allegation. However, when large numbers of the same types of complaints are received over a measured period of time, and by more than one agency, it is reasonable to conclude that a problem exists.

As can be seen from the data in this report, housing discrimination complaints based on disability and race are the basis for most complaints. An analysis of Home Mortgage Disclosure Act (HMDA) reports also indicated the existence of differential treatment in the availability of mortgage financing based on race.

Furthermore, disparate treatment of testers based on race was found in a number of instances in the rental and sale of, as well as in the financing of, housing. The results of the 2013 Rental, Sales, and Lending Audit Analysis coincides with and lends support to the aforementioned assertion that the consistently high numbers of complaints filed with FHCRC and HUD, based on race, may be indicators of a housing discrimination problem, even though each complaint ultimately must be validated on its own merits.

In short, an evaluation of data contained in this report suggests that housing discrimination persists countywide, in subtle and not so subtle forms, particularly in the categories of disability, race and family status, as well as in the mortgage lending industry. The following is a summary of issues discussed in the Audit Analysis that could be considered significant impediments to fair housing countywide.

a. Affordable Housing

The recent economic crisis has contributed to the increasing need for additional affordable rental housing. As individual income decreased due to the economy, so did the ability to afford decent housing. One of the biggest problems facing low-income individuals is the gap between what they can afford to pay for housing and the actual cost of that housing. Based on the current fair market rent for rental properties and the fact that 43.3% of household earn less than \$50,000 per year, the affordability of rental housing is a major issue in Riverside County.

b. Lack of Available Housing

For very low-income and extremely low-income renters, the market for affordable housing is the worst in 25 years. One of the main causes of this situation is the overall inadequate pool of housing available. According to an annual report by the National Low Income Housing Coalition (NLIHC), titled *Out of Reach*, for every 100 extremely low-income renters in California, only 38 affordable units exist. Housing shortages increase the probability of housing discrimination by creating competition that can be used to disguise unlawful discrimination practices.

c. Disabilities

Impediments to Fair Housing for Individuals with disabilities are finding housing that meets their specific criteria, having full use and enjoyment of their current dwelling, and housing discrimination. Thankfully, privately owned and publicly assisted housing must meet the accessibility requirements of the Fair Housing Act. Still, only buildings of four or more units built after March 13, 1991 are subject to these requirements.

d. Advertising

Potential renters most often begin their search for a home from advertising material. Unfortunately, the language used is often improper and even the use of models may indicate a preference and can be a potential problem. Advertising a "no pets" policy can also be an impediment to Fair Housing if the housing provider is not aware that a service or companion animal is not a pet.

e. Viewing the Unit

One of the most common discrimination a potential renter may encounter is when viewing the unit. Housing providers may make a judgment based on one's race, disability, familial status or other characteristic when determining qualifications. In

some cases, potential renters are quoted different terms and conditions than other potential renters because of the housing provider's discriminatory actions.

f. Credit Check

Potential renters may be asked to produce documentation regarding credit history, current and previous addresses and landlords, as well as employment history/salary. Qualifications criterion for tenant selection, if any, are usually not known to those seeking to rent. Although housing providers may set qualification guidelines that screen potential tenants, in many instances poor credit or rental history is used as a reason for denial as a way to exclude certain protected classes.

g. Leasing Issues

Standard leases or rental agreements include information regarding the monthly rental rate, required deposit, length of occupancy, community/house rules, and termination requirements. Most leases and rental agreements are standard for all units within the same community. The enforcement of the rules in the lease or rental agreement, however, may not be uniform for all tenants. Housing providers may choose strict enforcement of the rules for certain tenants based on discriminatory factors, such as familial status, race or disability, as well as arbitrary factors such as tattoos or body piercing. Since the recent escalation of housing prices throughout California, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased.

In a lucrative housing market, one potential impediment to Fair Housing is that some housing providers favor shorter lease terms like month-to-month leases. It allows the housing provider to forego a waiting period to increase rents and sometimes increasing rent is a way to push out tenants that they consider undesirable.

Lastly, the security deposit can also serve as an impediment. To deter what a landlord perceives as less desirable tenants, the landlord may ask for a deposit higher than for others.

h. Steering

When Caucasian purchasers are discouraged from neighborhoods of color, while African American purchasers are steered toward those same neighborhoods, there is a clear violation of the Federal Fair Housing Act. Sometimes real estate agents steer by limiting the location of homes they show buyers. In other cases, real estate agents steer by making comments and editorializing about communities and neighborhoods. This type of activity by those working in the real estate industry presents a clear impediment to fair housing choice.

i. Habitability

The California Supreme Court has recognized that every residential lease carries with it an implied warranty of habitability. California Civil Code §1942 gives a tenant

two options if the premises are uninhabitable: repair the problems and deduct the cost from the rent, or move out. This creates a situation where although the remedies of “repair and deduct” or “move out” are great on paper, yet in practice they are too risky for tenants to truly benefit from them. This creates an impediment to Fair Housing because tenants then come to accept the substandard living conditions as unavoidable. Low income families are often the most impacted by substandard living conditions, which makes the need to address this impediment to Fair Housing all the more important.

j. Constructive Evictions

Another impediment to Fair Housing that is related to habitability is the constructive eviction. A constructive eviction occurs when a landlord takes actions that interfere with the tenant's use and enjoyment of the premises in a significant way. Some of the tactics that landlords engage in that may result in a constructive eviction are cutting off the tenant's utilities or other essential services; harassing the tenant, whether verbally, physically, or emotionally; or blocking the tenant's access to the unit, such as changing the locks. Actions behind a constructive eviction are an attempt by the landlord to remove a lawful tenant without going through the proper unlawful detainer process.

k. Predatory Lending

Predatory lending occurs when a variety of characteristics are present during the lending process or in the final mortgage loan itself. These characteristics include targeting specific groups for mortgage loans, unreasonable loan terms, and fraudulent behavior by the lender. Given the financial dangers associated with subprime loans, prepayments penalties, excessive fees, exaggerated incomes and abusively high rates, it is clear that discrimination found in the subprime market constitutes a grave threat to the financial well-being of America's already underserved populations. The Department of Housing and Urban Development (HUD) has noticed that homeowners in high-income African-American neighborhoods are 6 times more likely to have a subprime loan compared to homeowners in a high-income Caucasian neighborhood.

Product steering is another form of predatory lending that occurs when the borrower will be offered a variety of loan options, but they will be persuaded to take the higher cost loan. This was often seen when lenders steered potential borrowers towards FHA loans, even though they could have qualified for a conventional loan. There are benefits to an FHA loan but statistics have shown that even with these benefits, an FHA loan will cost the borrower more money over the life of a loan than a conventional loan would.

l. Other Lending / Sales Concerns

Other impediments to Fair Housing in the lending and sales market that do not involve predatory lending are differential treatment of minorities or low-income

individuals in the lending process and real estate agents refusal to deal with transactions for properties valued less than \$100,000 or so. These are yet additional hurdles for low-income individuals and are impediments to Fair Housing that needs to be addressed.



## **SECTION IV RECOMMENDATIONS**

### **A. CONCLUSIONS AND RECOMMENDATIONS**

The following paragraphs present conclusions regarding the extent of impediments to fair housing choice within Riverside County, along with recommendations for mitigating these impediments. The information presented herein is by no means comprehensive, and there undoubtedly remain a number of additional remedies to the problems faced by home seekers.

Based on the impediment revealed in the FHCRC Audit, the following recommendations are suggested for Riverside County to continue the alleviation of impediments to fair housing:

- Audits should be conducted periodically to determine the nature, extent, and changes to housing discrimination throughout Riverside County. These audits should be focused on all of the protected classes under California law.
- Specific audits should be conducted on the new interpretations of the Unruh Act, which now covers gender identity and gender expression under the protected class of sex. Individuals who fall into these categories deserve the full protection of the law, but it is likely that many housing providers are discriminating on these protected bases.
- Further audits should also be conducted on the basis of disability. The topic of service and companion animals is still confusing for many housing providers, who continue to tell individuals that they cannot have a service or companion animal because of a "no pets" policy. This is blatantly discriminatory under Fair Housing laws, and further education and outreach is also needed to inform housing providers of the applicable law.
- In an effort to ensure that all potential renters are treated the same, owners of rental property should be encouraged to provide written documentation to all applicants. This documentation should include a listing of all available housing and also include standardized information on the terms and conditions of the rental process, such as income qualifications, down payments, and other fees or expenses.
- Provide workshops to the general public on the topics of budgeting and credit issues. This will increase the general public's financial education and improve their living conditions. This also may help to boost the overall economy, as it is beneficial for the county when more individuals and families are in a stronger financial situation.

- Provide local non-profit organizations with support to market their services, as these services are critical to the sustained success of the community. If individuals have more awareness regarding the free services made available by local non-profits, they are more likely to take advantage of those services. In turn, when these free services are taken advantage of, it will benefit those individuals directly and also will benefit the community as a whole.
- In order to help all individuals understand and respect the diversity of cultures in Riverside County, more education, training, and outreach on Fair Housing laws and cultural sensitivity should be provided to tenants, managers, owners, and apartment owner associations.
- Develop and expand an educational program for housing providers, community organizations, and the general public regarding housing discrimination, Fair Housing laws, and the options available for individuals who have been the victims of discrimination.
- Continue homebuyer educational programs and ongoing education for participants in First- Time Homebuyer Programs, such as the program that FHCRC offers to the public.

## **B. ANALYSIS OF IMPEDIMENTS MATRIX**

Affordable Housing	Aleviate governmental constraints which add to the cost of housing and developer costs.	Economic Development Agency (EDA)	Fair Housing Counsel of Riverside County, Inc. (FHCRC)	Ongoing	
	Reduce the cost of housing to the consumer, be it rental or single-family homes, through the elimination of unnecessary governmental actions, policies and regulations.	EDA	FHCRC	Ongoing	
Lack of Available Housing	Increase the number of Agency funded affordable single and multifamily housing projects.	EDA	FHCRC	Ongoing	
Disabilities	Provide education and outreach to housing providers through seminars or community workshops increasing education regarding current law on discrimination against the disabled.	Fair Housing Counsel of Riverside County, Inc. (FHCRC)	EDA	Ongoing	
	Expand or explore the type of disability discrimination prevalent in certain communities and target the outreach appropriately. Future audits could include wheelchair testers and other protected class groups such as persons with AIDS and mentally ill persons.	FHCRC	EDA	Ongoing	
	Work in cooperation with and support the efforts of non-profit community service providers that assist disabled persons in locating suitable housing through information, referrals, and community education.	EDA	FHCRC	Ongoing	
	Provide education and outreach to housing providers through seminars or community workshops in educating the current law on discrimination against the disabled.	FHCRC	EDA	Ongoing	
Advertising/Viewing the Unit	Rental property owners, managers, and realtors should be encouraged to provide written documentation to all applicants which include the listings of all available housing, standard information on the terms and conditions of the application process, posting Fair Housing Informational signs and providing Fair Housing literature.	FHCRC	EDA	Ongoing	
Credit Check/Leasing Issues	Encourage rental property owners, managers, and realtors to provide written documentation to all applicants that includes the listings of all available housing, standard information on the terms and conditions of the application process, such as income qualifications, down payments, and other fees and expenses, posting Fair Housing Informational signs and providing Fair Housing literature	FHCRC	EDA	Ongoing	
Predatory Lending/Steering	Continue to provide homebuyer education, credit counseling, and fair housing counseling and awareness training to the first-time home buyers and homeowners, particularly low-income and very low-income applicants.	FHCRC	EDA	Ongoing	
Habitability/Constructive Evictions	Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public regarding housing discrimination, fair housing laws, and services provided by the Fair Housing Council	FHCRC	EDA	Ongoing	
Other Lending/Sales Concerns	Contract with the Fair Housing Council of Riverside County, Inc., to conduct audit testing.	EDA	FHCRC	Ongoing	
	Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by the Fair Housing Council.	FHCRC	EDA	Ongoing	
	Continue homebuyer education programs and ongoing education for participants in the first time homebuyer program that the Fair Housing Council offers.	FHCRC	EDA	Ongoing	

**SECTION V  
APPENDICES**

## **A. Glossary of Terms**

### **California Association of Realtors**

A statewide organization of realtors formed to serve its membership in developing and promoting programs and services that will enhance the members' freedom and ability to conduct their individual businesses successfully with integrity and competency, and through collective action, to promote the preservation of real property rights.

### **California Consumer Price Index**

An index measuring the prices at various times of a selected group of goods and services, which typify those bought by ordinary Californian households. It allows comparisons of the relative cost of living over time, and is used as a measure of inflation.

### **California Redevelopment Law**

Section 33000 of the California Health and Safety Code assisting local jurisdictions to eliminate blight from a designated area, as well as to achieve the goals of development, reconstruction and rehabilitation of residential, commercial, industrial and retail districts.

### **CDBG Community Development Block Grant**

A program operated by the United States Department of Housing and Urban Development. The program is codified under 24 CFR Part 570. The program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

### **CHAS Comprehensive Housing Affordability Strategy**

A plan formerly required of CDBG grantees until 1994. HUD commissioned a special tabulation of 1990 census data to provide CDBG grantees with useful housing data to help them complete the plan. In 1995, many grantees used this data again for their first Consolidated Plan. The current HUD requirement is a Consolidated Plan in lieu of a CHAS.

### **Civil Rights Act of 1964**

Federal legislation to enforce the constitutional right to vote, to confer jurisdiction upon the district courts of the United States to provide injunctive relief against discrimination in public accommodations, to authorize the Attorney General to institute suits to protect constitutional rights in public facilities and public education, to extend the Commission on Civil Rights, to prevent discrimination in federally assisted programs, to establish a Commission on Equal Employment Opportunity, and for other purposes.

### **Civil Rights Act of 1968**

Federal legislation, which includes within it the Federal Fair Housing Act.

### **Comprehensive General Plan**

A planning document required by section 65300 of the California State Government Code. The document sets forth plans for zoning, transportation, housing development and land use.

### **Cooperating City**

A city within the County of Riverside, which has signed a Three Year Cooperation Agreement and is actively participating with the County of Riverside to provide services,

programs and projects eligible under the Housing and Urban Development's Community Planning and Development's grant funding sources.

**Covenant Agreement**

An agreement, required by the California Redevelopment Law for the use of Low Income Housing Set Aside Funds, imposing affordability requirements on any assisted housing unit.

**Community Planning and Development (CPD)**

A division of the United States Department of Housing and Urban Development seeking to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low and moderate income persons. The primary means toward this end is the development of partnerships among all levels of government and the private sector, including for-profit and non-profit organizations. The CPD office is responsible for the operation of the HOME Investment Partnership Act, Community Development Block Grant, and Emergency Shelter Grant programs and funds.

**CRA** Community Reinvestment Act

A federal statute enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e intended to encourage depository institutions to help meet the credit needs of the communities in which they operate.

**Debt Income Ratio**

The ratio given by dividing the monthly debt by the monthly income.

**Department of Mental Health**

A department of the County of Riverside established to provide effective, efficient, and culturally sensitive community-based services to severely mentally disabled adults and older adults, children at risk of mental disability, substance abusers, and individuals on conservatorship that enable them to achieve and maintain their optimal level of healthy personal and social functioning.

**DFEH** Department of Fair Employment and Housing

A department of the State of California with a mission to protect the people of California from unlawful discrimination in employment, housing and public accommodations, and from the perpetration of acts of hates violence.

**DRE** Department of Real Estate

A department of the State of California with a mission to protect the public in real estate transactions and provide related services to the real estate industry.

**EDA** Economic Development Agency

A department of the County of Riverside charged with the management and operation of programs under HUD's Community Planning and Development.

**Executive Order 11063**

A 1962 order by President John F. Kennedy enforcing equal opportunity in housing and preventing discrimination.

**Fair Housing Act**

Federal legislation first enacted in 1968 and expanded by amendments in 1974 and 1988 providing HUD with investigation and enforcement responsibilities for fair housing practices and prohibiting discrimination in housing and lending based on race, color, religion, sex, national origin, handicap, or familial status.

**Fair Housing Choice**

The ability of persons of similar income to have available to them the same housing choices without regard to race, color, religion, sex, disabilities, familial status, or national origin.

**FHA** Federal Housing Administration

A department of the federal government established by the National Housing Act of 1934, administered by the Assistant Secretary for Housing, who is responsible for the Department's various mortgage insurance programs promoting homeownership through government guaranteed mortgages.

**FHCRC** Fair Housing Council of Riverside County

A non-profit organization providing comprehensive services which affirmatively address and promote fair housing (anti-discrimination) rights and further other housing opportunities for all persons without regard to race, color, national origin, religion, sex, familial status, presence of children, disability, ancestry, marital status, or other arbitrary factors.

**FSA** Farm Services Agency

Formerly known as the Farmers Home Administration (FmHA). This agency of the United States Department of Agriculture ensures the well-being of American agriculture, the environment and the American public through efficient and equitable administration of farm commodity programs; farm ownership, operating and emergency loans; conservation and environmental programs; emergency and disaster assistance; domestic and international food assistance and international export credit programs.

**HCD** Housing and Community Development

An agency of the State of California and one of thirteen (13) departments within the Business, Transportation and Housing Agency As California's principal housing agency, the mission of HCD is to provide leadership, policies and programs to expand and preserve safe and affordable housing opportunities and promote strong communities for all Californians.

**HMDA** Home Mortgage Disclosure Act

A federal statute enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C requiring lending institutions to report public loan data.

**Housing Authority of the County of Riverside**

A public agency chartered by the State of California to administer the development, rehabilitation or financing of affordable housing programs with a mission to provide affordable decent, safe and sanitary housing opportunities to low and moderate income families including elderly and disabled persons, while supporting programs to foster economic self-sufficiency.

**Housing Element**

A required component of the Comprehensive General Plan, which plans for the appropriate level of growth in housing stock for the local jurisdiction.

**HRP Home Repair Program**

A program operated by the Economic Development Agency offering grants to low-income homeowners to make health and safety oriented repairs to their homes.

**HUD Housing and Urban Development**

A branch of the federal government created by the Department of Housing and Urban Development Act of 1965 with a mission to increase homeownership, support community development and increase access to affordable housing free from discrimination.

**Land Use Ordinance 348**

An ordinance of the County of Riverside providing for land use planning and zoning regulations and related functions.

**Low Income**

Income that does not exceed 80 percent of area median income.

**Low Income Housing Set Aside Fund**

A requirement of the California Redevelopment Law to reserve twenty percent (20%) of all funds generated by a redevelopment agency and make them available as contribution toward the provision of housing affordable to low income persons.

**Low Poverty Area**

A census tract where less than a ten percent (10%) incidence of household poverty exists.

**MFI Median Family Income**

Also referred to as Area Median Income and Area Median Family Income.

An income of a family or household size found, by the United States Census Board, to be the average income for that family or household size within local and specified geographic boundaries.

**MLS Multiple Listing Service**

A marketing organization composed of member brokers who agree to share their listing agreements with one another in the hope of procuring ready, willing and able buyers for their properties more quickly than they could on their own.

**Moderate Income**

Income that does not exceed 120 percent of area median income.

**Planning Commission**

A public body of the County of Riverside assembled to review proposed land uses to ensure conformity with the Comprehensive General Plan.

**Rehabilitation Act of 1973**

Federal legislation, enacted in September 1973, prohibiting federally subsidized facilities from discriminating against persons with disabilities.



**RHS** Rural Housing Service

An agency of the United States Department of Agriculture with a mission is to improve the quality of life in rural areas by providing funding for single family homes, apartments for low-income persons or the elderly, housing for farm laborers, childcare centers, fire and police stations, hospitals, libraries, nursing homes and schools.

**SHR** Senior Home Repair

A program operated by the Economic Development Agency offering grants to very low-income senior or disabled homeowners to make health and safety oriented repairs to their homes.

**Section 8 Housing Choice Voucher Program**

Project and tenant based rental assistance via housing assistance payments authorized by the Housing and Community Development Act of 1974.

**Sponsor Agreement**

An agreement between the County of Riverside and a non-public sub grantee for the use of HUD Community Planning and Development funds.

**Sub Grantees**

An entity or person receiving assistance from the County of Riverside of funds granted by HUD.

**Supplement Agreement**

An agreement between the County of Riverside and a public sub grantee for the use of HUD Community Planning and Development funds.

**VA** Veterans Administration

A federal agency, which coordinates and consolidates all federal program providing benefits to veterans and operates the VA Loan Guarantee and Mortgage Insurance program providing home mortgage guarantees authorized by the Serviceman's Readjustment Act.

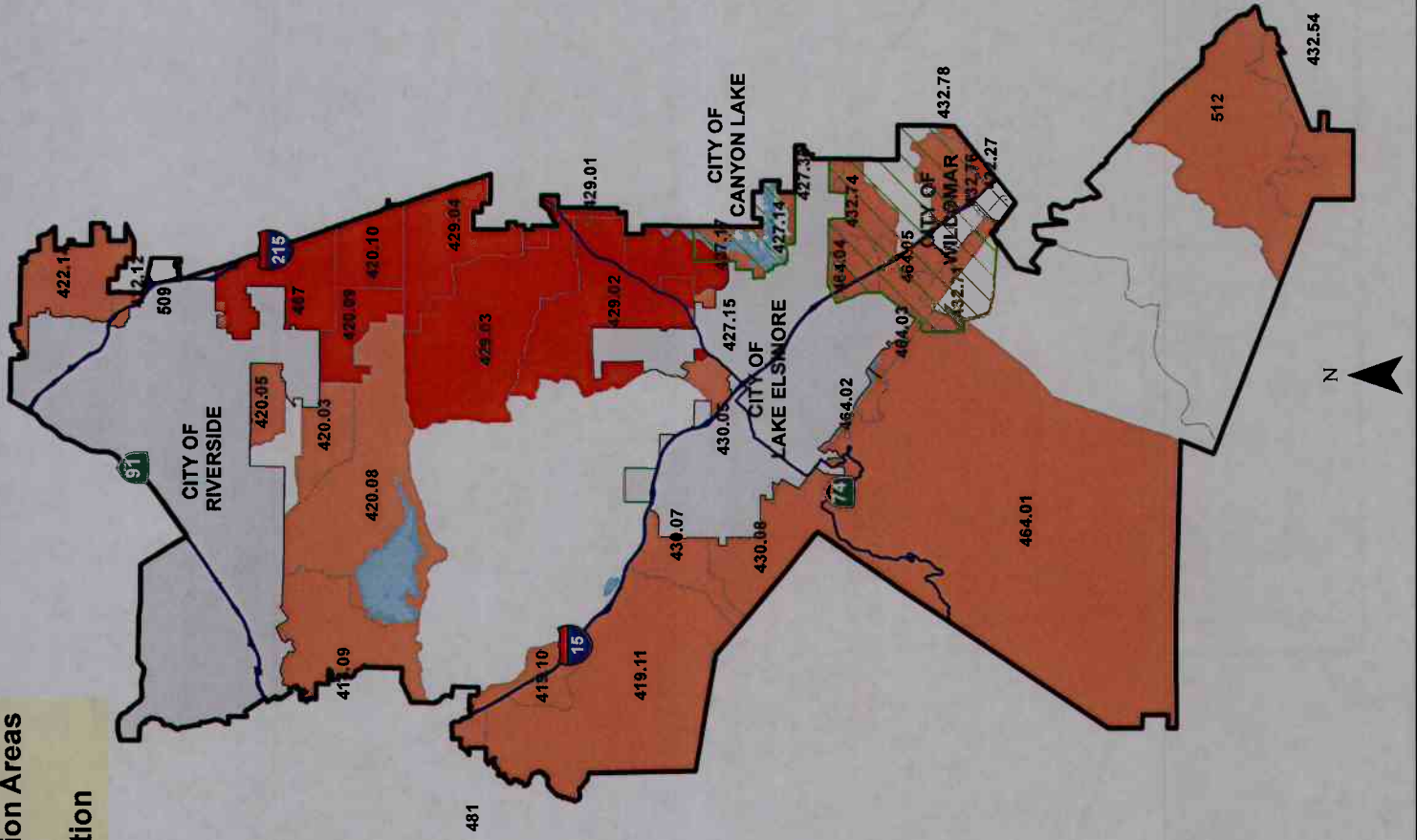
**Very Low Income**

Income that does not exceed 50 percent of area median income.

**Appendix B**  
**Fair Housing Audit Analysis**

**Appendix C**  
**County of Riverside Ethnic Concentrations Map**

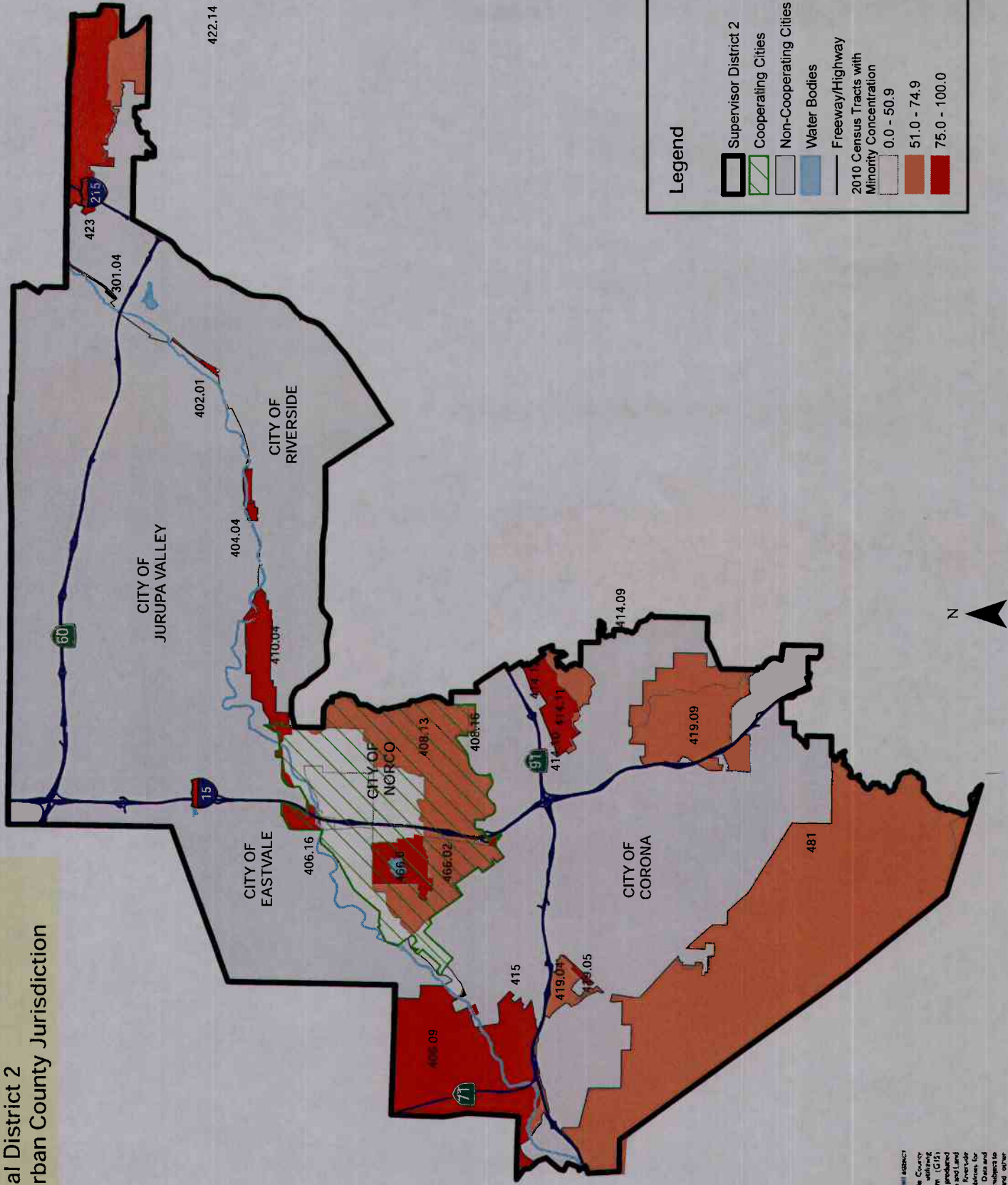
# Race/Ethnic Minority Concentration Areas Supervisor District 1 Riverside Urban County Jurisdiction



**EDC**  
ECONOMIC DEVELOPMENT CENTER

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**Race/Ethnic Minority Concentration Areas  
Supervisor District 2  
Riverside Urban County Jurisdiction**



**Legend**

- Supervisor District 2
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway

**2010 Census Tracts with Minority Concentration**

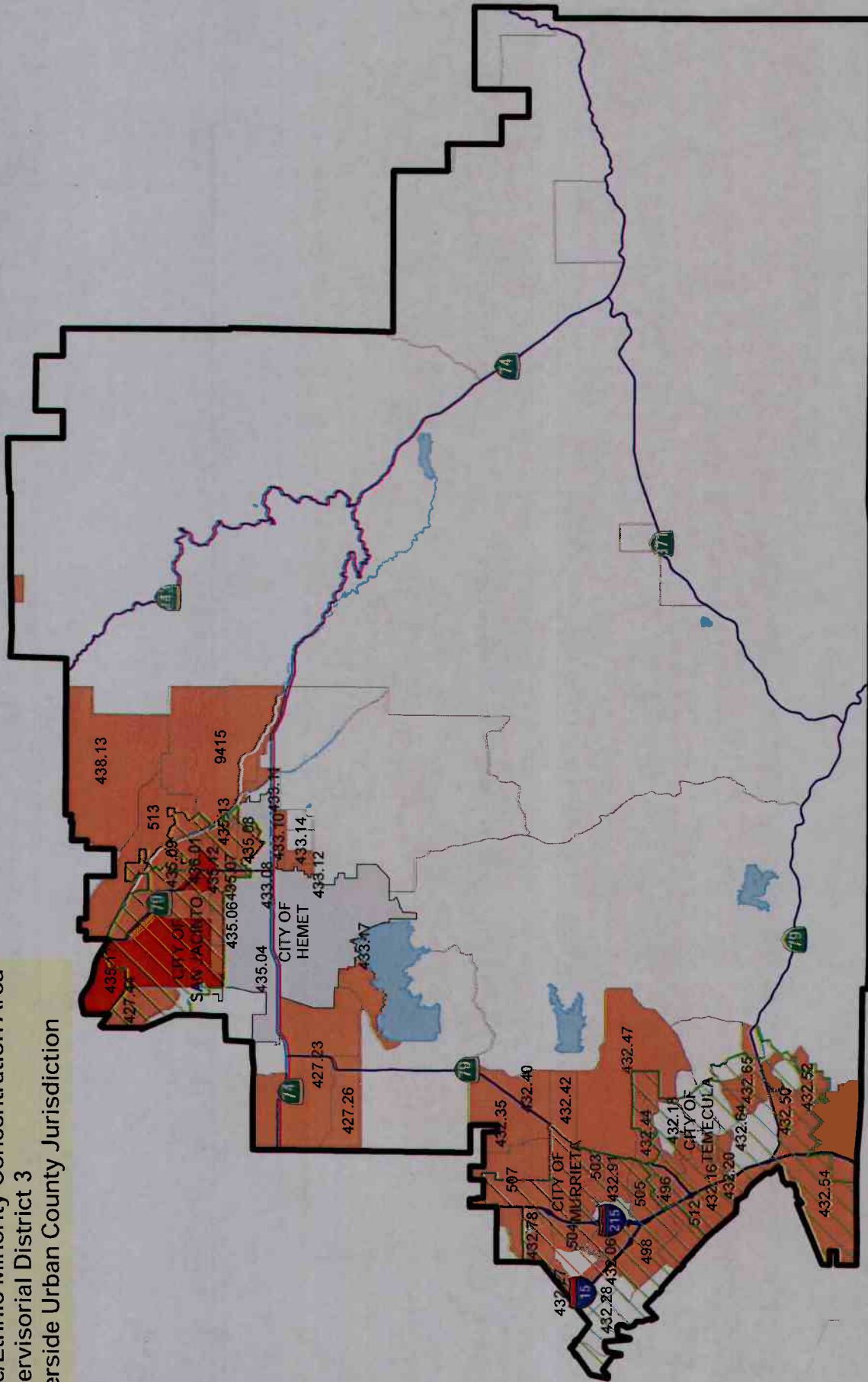
- 0.0 - 50.9
- 51.0 - 74.9
- 75.0 - 100.0



**EDA**  
Economic Development Agency  
COUNTY OF RIVERSIDE

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Race/Ethnic Minority Concentration Area  
 Supervisorial District 3  
 Riverside Urban County Jurisdiction



**EDA**  
 ENVIRONMENTAL DESIGN ADVISORS

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 Economic Development Agency utilizing  
 Geographic Information System (GIS)  
 technology. The map shows some general  
 information only. The County of Riverside  
 does not warrant or make any representation as to  
 the accuracy, completeness, or timeliness of the  
 information displayed on this map. EDA and  
 Riverside County are not responsible for any  
 errors or omissions in this map or data.

**Legend**

- Supervisorial District 3
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway

2010 Census Tracts with  
 Minority Concentration

- 0.0-50.9
- 51.0-74.9
- 75.0-100.0



# Race/Ethnic Minority Concentration Areas Supervisor District 4 Riverside Urban County Jurisdiction



**Legend**

- Supervisor District 4
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway

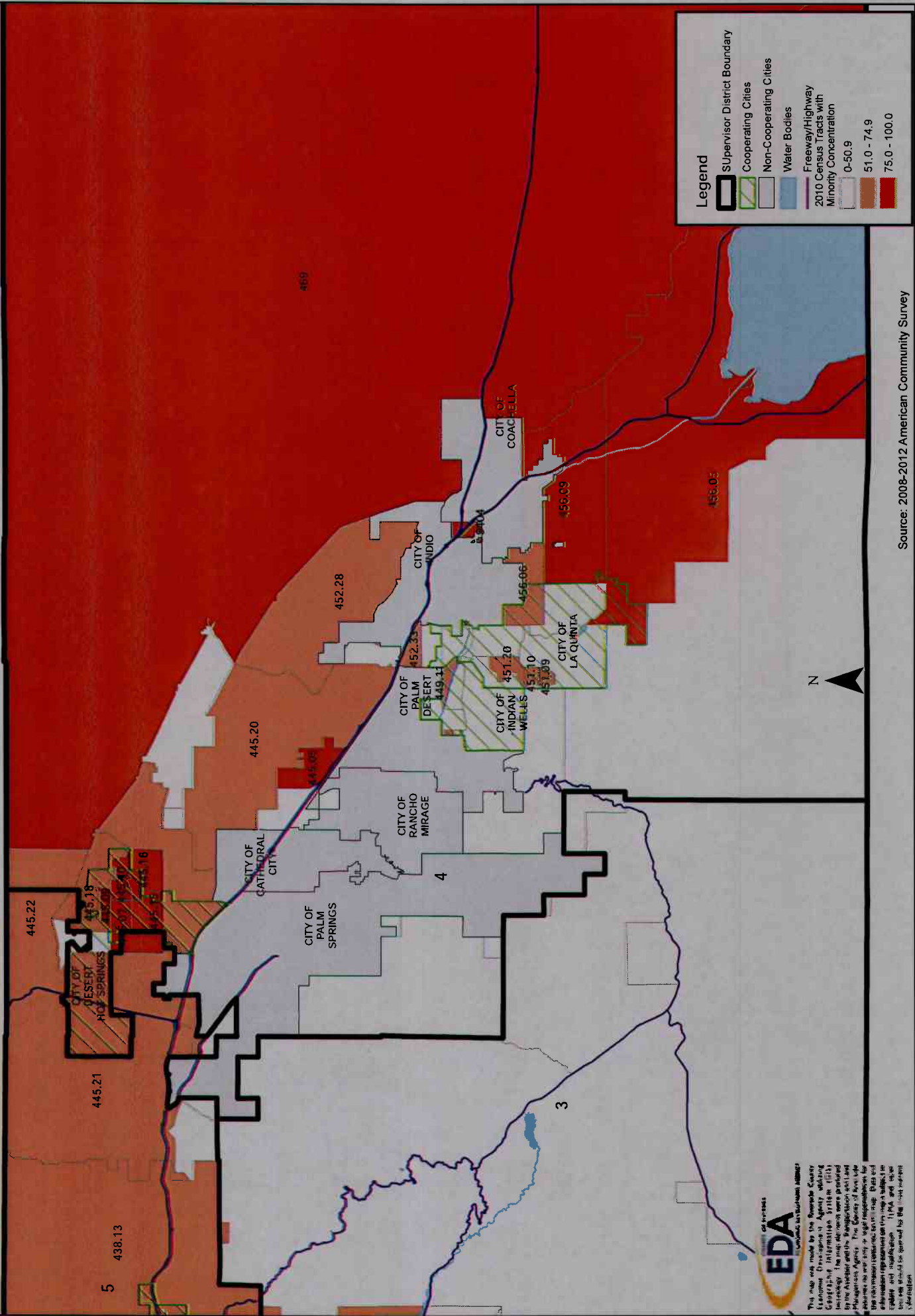
2010 Census Tracts with Minority Concentration

- 0-50.9
- 51.0 - 74.9
- 75.0 - 100.0

**EDA**  
Economic Development Authority

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Race/Ethnic Minority Concentration Areas  
Coachella Valley  
Riverside Urban County Jurisdiction



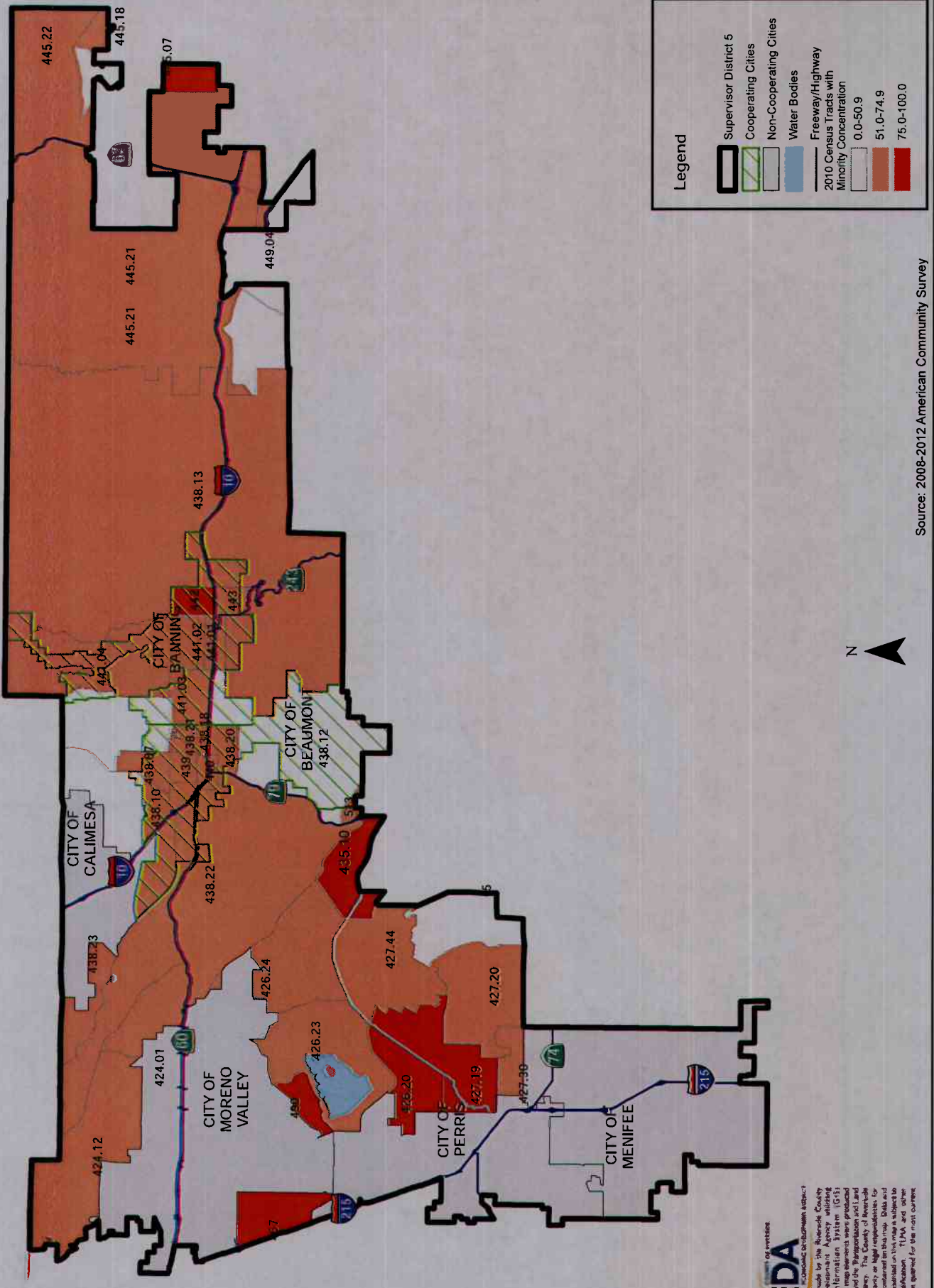
Source: 2008-2012 American Community Survey

**EDA**  
Economic Development Authority

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# Race/Ethnic Minority Concentration Areas Supervisorial District 5 Riverside Urban County Jurisdiction



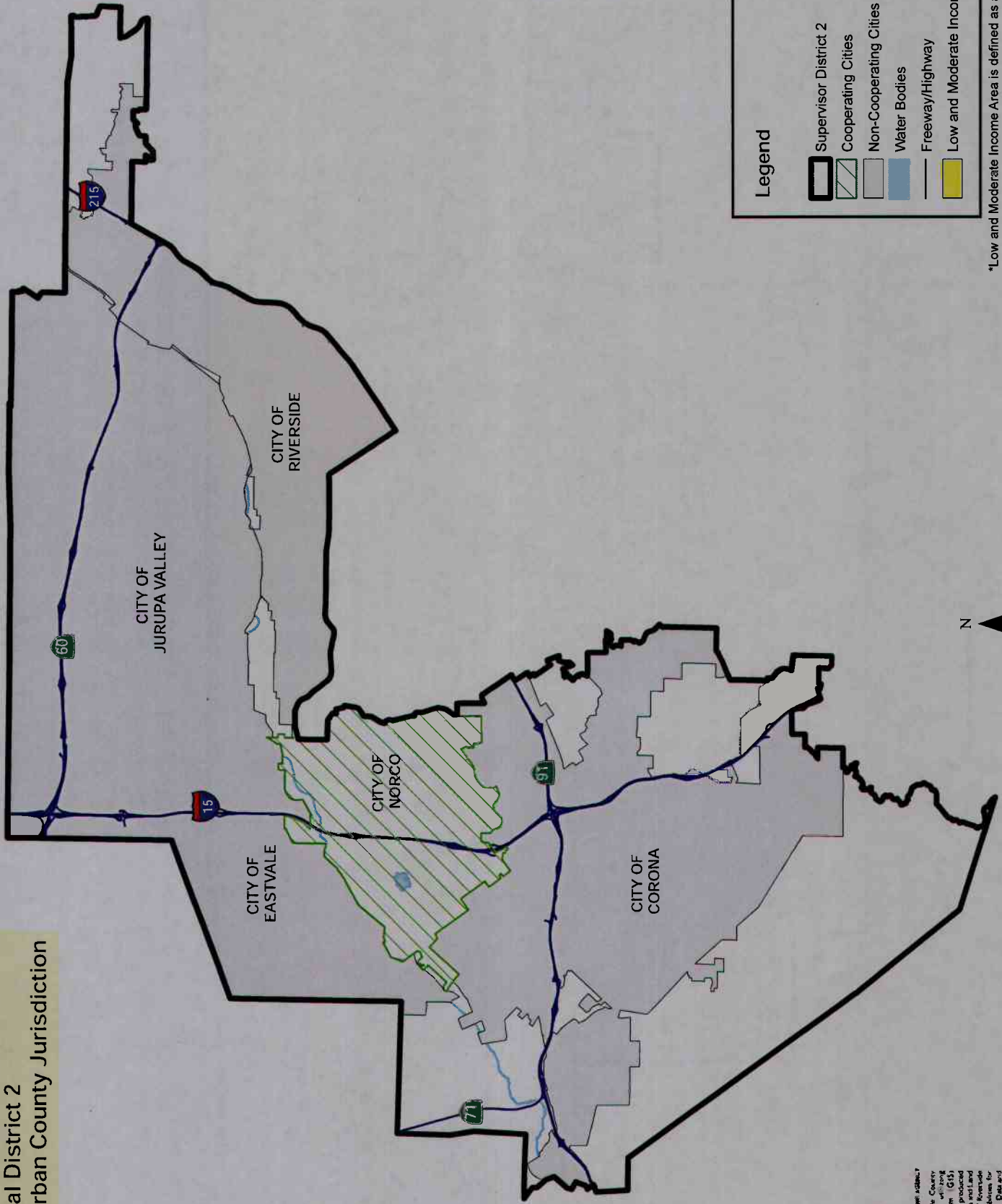
**EDA**  
Economic Development Authority  
of Riverside

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**Appendix D**  
**County of Riverside Low/Moderate Income Areas**



**Low and Moderate Income Areas  
Supervisor District 2  
Riverside Urban County Jurisdiction**



**Legend**

- Supervisor District 2
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway
- Low and Moderate Income area



**EDA**  
COUNTY OF RIVERSIDE  
ECONOMIC DEVELOPMENT AGENCY

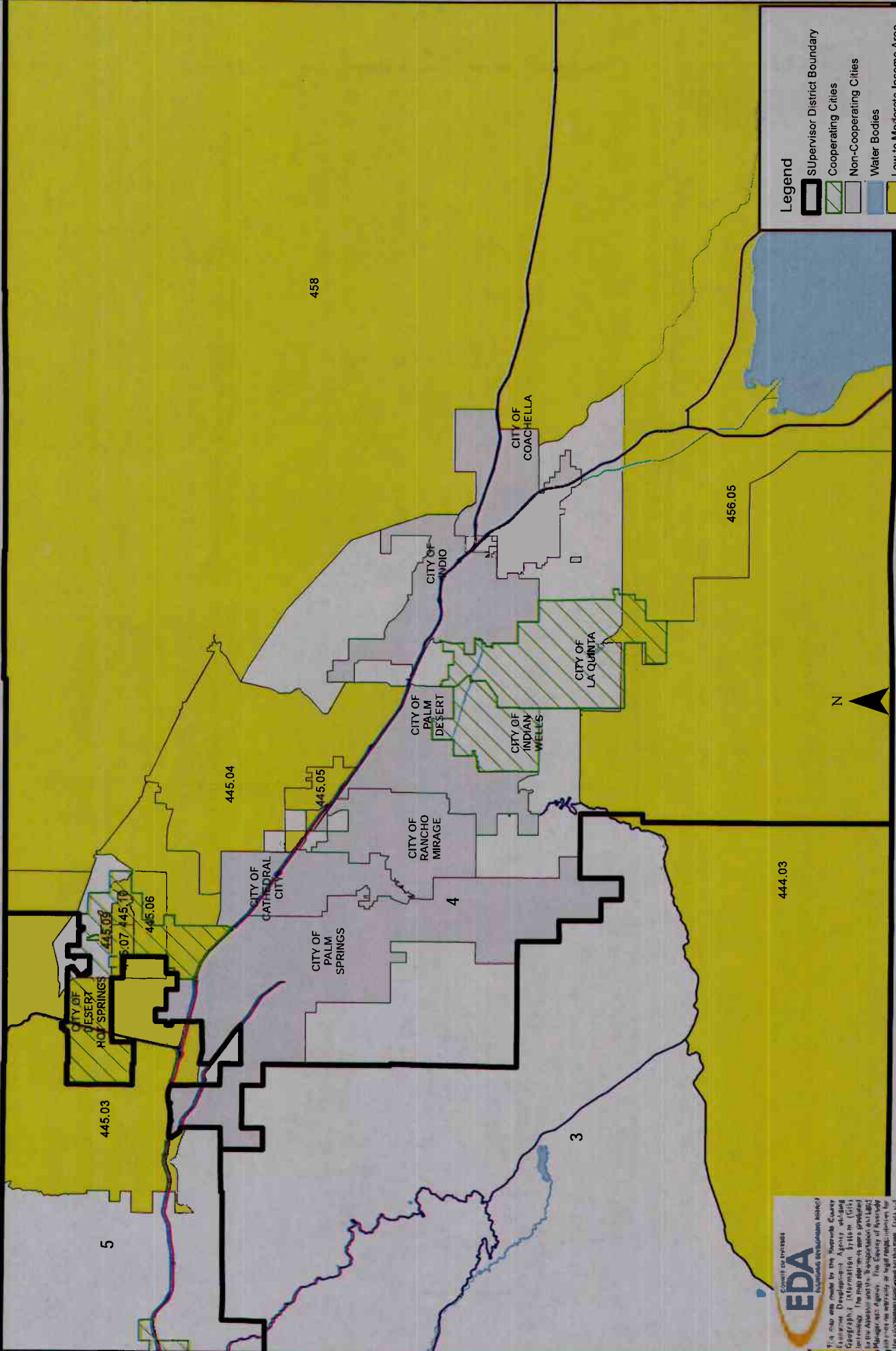
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\*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.  
Source: 2000 Census, HUD Low and Moderate Income Summary Data, FY13.





Low and Moderate Income Areas  
Coachella Valley  
Riverside Urban County Jurisdiction

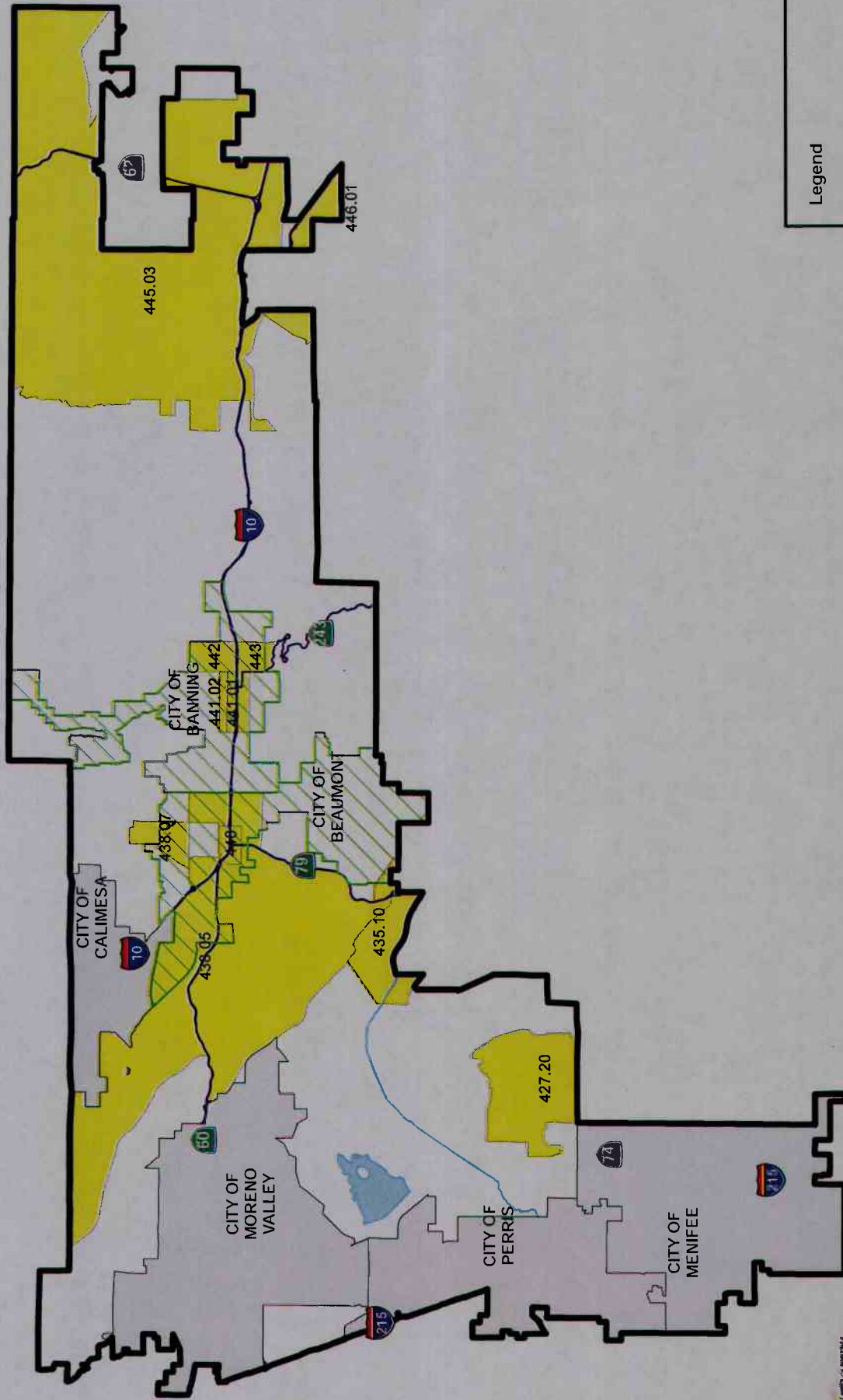


EDA  
Economic Development Authority

This map was prepared by the Riverside County Economic Development Authority (EDA) for the Coachella Valley Information System (CVIS) project. The map data was prepared by the Riverside County Department of Planning and Economic Development. The City of Riverside is the primary jurisdiction for the Coachella Valley. The map data was prepared by the Riverside County Department of Planning and Economic Development. The map data was prepared by the Riverside County Department of Planning and Economic Development.

\*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population. Source: 2000 Census, HUD Low and Moderate Income Summary Data, FY13.

Low and Moderate Income Areas  
 Supervisorial District 5  
 Riverside Urban County Jurisdiction



**EDA**  
 COUNTY OF RIVERSIDE  
 ECONOMIC DEVELOPMENT DIVISION

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\*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.  
 Source: 2000 Census, HUD Low and Moderate Income Summary Data, FY13.



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## PROOF OF PUBLICATION (2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

### PROOF OF PUBLICATION OF

Ad Desc.: /

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, under date of February 4, 2013, Case Number RIC 1215735, under date of July 25, 2013, Case Number RIC 1305730, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

4/04, 04/16/2014

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: April 16, 2014  
At: Riverside, California



EDA COMMUNITY PLANNING DIVISIO  
3133 MISSION INN AVE  
RIVERSIDE, CA 92507

Ad Number: 0001253200-01

P.O. Number:

Ad Copy.

### NOTICE OF PUBLIC HEARING

Pursuant to 24 CFR Part 91.105(e)(1) and the County of Riverside's Citizen Participation Plan, NOTICE IS HEREBY GIVEN that the Board of Supervisors of the County of Riverside will conduct a public hearing to consider any comments or views of affected citizens, public agencies, and other interested parties on the 2014-2019 Five Year Consolidated Plan, the 2014-2015 One-Year Action Plan, the Citizen Participation Plan for the 2014-2019 Five Year Consolidated Plan, and the Fair Housing Impediment Study.

Said public hearing is scheduled for May 6, 2014, at 10:30 a.m., in the Board of Supervisors Chambers, County Administration Center, 4080 Lemon Street, 1st Floor, Riverside, California, to formally receive public comments.

**Executive Summary:** 24 CFR Part 91.105, Consolidated Submission for Community Planning and Development Program, Final Rule, requires that the County of Riverside prepare a Consolidated Plan in order for the County to receive Federal funds under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. The Consolidated Plan has as its focus the singular goals of consolidating the Community Planning and Development (CPD) planning and application requirements into a single submission. The objectives contained in this planning document are to develop viable communities through public/private partnerships by providing decent affordable housing, a suitable living environment, and expanded economic development opportunities principally for persons of low- and moderate-income.

**Participating Communities:** The 2014-2019 Consolidated Plan will cover the unincorporated areas of the County and the following cooperating cities: Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Indian Wells, La Quinta, Murrieta, Norco, and San Jacinto. The Joint Metro city of Lake Elsinore is also included within the County's CDBG program.

To comply with the Federal requirements in the preparation of the Consolidated Plan, the County of Riverside will hold a 30-day public comment period beginning April 4, 2014. It is anticipated that the Board of Supervisors will adopt the Consolidated Plan and One Year Action Plan at the regular meeting of May 6, 2014. The Consolidated Plan will then be forwarded to the U.S. Department of Housing and Urban Development on or about May 15, 2014, for final review and approval.

**Citizen Review and Comments:** Concerned individuals may view the draft 2014-2019 Consolidated Plan, 2014-2015 One-Year Action Plan, the Citizen Participation Plan for the 2014-2019 Five-Year Consolidated Plan, and the Fair Housing Impediment Study beginning April 4, 2014, at the following locations:

Riverside County Economic Development Agency-  
Community Services Division  
3403 10th Street Suite 400, Riverside, CA 92501  
(951) 955-8916

Riverside County Economic Development Agency-Indio  
44-199 Mariposa Street Suite B, Indio, CA 92201  
(760) 863-2650

Written comments may be submitted to the above addresses no later than 4:00 PM on May 5, 2014. Comments may also be sent via email to [mmvaldivia@rvcoeda.org](mailto:mmvaldivia@rvcoeda.org).

All of the draft documents can also be viewed online at [www.rvcoeda.org](http://www.rvcoeda.org). In addition, copies of the draft documents will also be made available for public viewing at various locations throughout the County. A list of these locations is available online at [www.rvcoeda.org](http://www.rvcoeda.org), or by contacting Melissa Valdivia at (951) 955-8916 or via email at [mmvaldivia@rvcoeda.org](mailto:mmvaldivia@rvcoeda.org).

Should you have any questions or need additional information, please contact Melissa Valdivia at (951) 955-8916 or via email at [mmvaldivia@rvcoeda.org](mailto:mmvaldivia@rvcoeda.org).

John Thurman, EDA Development Manager-  
CDBG/ESG Programs 4/4, 4/16

...guraron el sábado 29 de marzo el Instituto Binacional de Liderazgo de Padres de Familia.

...nto Zaragoza Flores.  
...a añadió que uno de los  
...s a vencer es la deserción  
...lar, misma que según ex-  
...tos, el índice local es de 50  
... ciento entre la comuni-  
...estudiantil Latina.  
...a Conferencia contó con  
...participación de expertos  
...ales, incluyendo Olivia  
...sas, vice presidente aso-  
...da de matriculación de  
...USB; Sylvia Méndez, ga-  
...ora de la Medalla Pre-  
...encial de la Libertad, ac-  
...sta durante los derechos  
...tiles y demandante du-  
...ante el histórico caso legal  
...own v. Board; y José Oscar  
...ga Marín, director de rela-  
...nes públicas del estado de  
...a California y ex secreta-  
...de educación del mismo  
...ado, entre otros.  
...ega Marín dijo que los

...problemas que enfrentan las  
...escuelas locales son simi-  
...lares a los que azotan a las  
...escuelas del vecino estado de  
...Baja California, incluyendo  
...el elevado índice de deser-  
...ción escolar por diferentes  
...razones, siendo el aspecto  
...económico la mayor razón.  
...“En México tenemos exce-  
...lentes universidades que son  
...prácticamente gratuitas pe-  
...ro eso no le resuelve al joven  
...su manutención, sus útiles, si  
...ya formo una familia el man-  
...tenimiento de sus hijos, mu-  
...chas veces el mantenimiento  
...de sus papas o de hermanos  
...menores, entonces no  
...siempre el tema de la cole-  
...giatura es el más impor-  
...tante”, comentó Vega Marín.  
...“En el caso de las muchachas  
...el tema de los embarazos que  
...las hace optar o siguen estu-

...diando o se dedican a ser ma-  
...dres de familia y hay que  
...mencionarlo también la falta  
...de capacidad del sistema pa-  
...ra recibir a estos muchachos”.  
...Vega Marín dijo que en el  
...estado de baja California,  
...con quien CSUSB planea au-  
...mentar un intercambio estu-  
...diantil, el deseo de supera-  
...ción muy a menudo rebaza el  
...cupó ofrecido de matricula-  
...ción. El experto en educación  
...añadió que para poder en-  
...viar estudiantes a universi-  
...dades estadounidenses se  
...debe primero trabajar en  
...ofrecer clases de inglés en to-  
...dos los niveles educativos.  
...“Que sepan inglés. Baja  
...California, donde tú supon-  
...drías que el inglés está a la  
...mano, no alcanza más del 15  
...por ciento de cobertura en  
...educación. Estamos traba-  
...jando para este sexenio que  
...acaba de comenzar llegar al

...100 por ciento en seis años, lo  
...mínimo que sepan inglés pa-  
...ra empezar”, comentó Vega  
...Marín. “Otro aspecto es el ni-  
...vel de compatibilidad de es-  
...tudios. Ya contamos con es-  
...cuelas que ofrecen educa-  
...ción que es aceptada en los  
...Estados Unidos pero hay que  
...profundizarla y magnificar-  
...la”.  
...Enrique Murillo, profesor  
...de educación y director de  
...LEAD, dijo que en el pasado  
...CSUSB implementó un inter-  
...cambio estudiantil con el es-  
...tado de Sonora y que uno de  
...los problemas que encararon  
...fue el elevado nivel de buro-  
...cracia en los Estados Unidos  
...ya que los poderes están rele-  
...gados a varias agencias edu-  
...cativas.  
...“Era chistoso ver a tres lí-  
...deres de México capaces de  
...aprobar acuerdos y a 10 lí-  
...deres locales que al final no  
...tenían el poder absoluto. El

...do de San Bernardino, contó  
...también con talleres educati-  
...vos en donde asistentes co-  
...mo Katty Alvarado, de la ci-  
...udad de Fontana, aprendie-  
...ron sobre los últimos requisi-  
...tos estatales de boca de  
...Carmen Beck, directora de  
...matriculación e instrucción  
...del Condado de San Bernar-  
...dino y José Espinoza, direc-  
...tor de la escuela de mejora-  
...miento e innovación del Con-  
...dado.  
...“Este Instituto me ayuda  
...como madre de familia a ten-  
...er un involucramiento más  
...avanzado y organizado, en  
...tener un mejor enfoque en la  
...educación de nuestros hijos  
...hoy en día”, comentó Alvara-  
...do.  
...La Conferencia cerró con  
...el taller denominado “¿Qué  
...es Defensa Avanzada y Lide-  
...razgo? Perspectivas Institu-  
...cionales y de Padres de Fami-  
...lia”, impartido por Marissa  
...Lazo-Necco, Marcelino Ser-  
...na y Abigail Medina, coordi-  
...nadores de padres de familia  
...a nivel local.



ALEJANDRO CANO/ESPECIAL PARA UNIDOS

...o del grupo que inauguraron el sábado 29 de marzo el  
...stituto Binacional de Liderazgo de Padres de Familia.



ALEJANDRO CANO/ESPECIAL PARA UNIDOS

...in durante una charla con la cónsul general de México en  
...Flores, antes de su discurso.

ALEJANDRO CANO/ESPECIAL PARA UNIDOS

### AVISO DE AUDIENCIA PÚBLICA

De conformidad con el 24 CFR Part 91.105(e)(1) y el Plan de Participación Ciudadana del condado de Riverside, LA PRESENTE NOTIFICA que la Junta de Supervisores del Condado de Riverside llevará a cabo una audiencia pública para considerar las observaciones o puntos de vista de los ciudadanos afectados, agencias públicas y otras partes interesadas sobre el plan '2014-2019 Five Year Consolidated Plan', el '2014-2015 One-Year Action Plan', el 'Citizen Participation Plan for the 2014-2019 Five Year Consolidated Plan', y el 'Fair Housing Impediment Study'.

Dicha audiencia pública está programada para el 6 de mayo 2014, a las 10:30 horas, en el Board of Supervisors Chambers, County Administration Center, 4080 Lemon Street, 1st Floor, Riverside, California, para recibir formalmente las observaciones del público.

**Resumen Ejecutivo:** 24 CFR Part 91.105, Bajo el fallo final, Sumisión Consolidado para el Desarrollo y Planificación Comunitaria requiere que el Condado de Riverside prepare un Plan Consolidado para que el Condado pueda recibir fondos federales bajo los programas Community Development Block Grant (CDBG), Home Investment Partnership (HOME), y de Emergency Solutions Grant (ESG). El Plan Consolidado tiene como foco los objetivos singulares de la consolidación de los requisitos de Planificación y Desarrollo Comunitario (CPD) de planificación y aplicación en una sola presentación. Los objetivos contenidos en este documento de planificación son el desarrollo de comunidades viables a través de asociaciones públicas / privadas, proporcionando una vivienda digna asequible, un entorno de vida adecuado, y las amplias oportunidades de desarrollo económico principalmente para las personas de bajos y moderados ingresos.

**Las comunidades participantes:** El Plan Consolidado 2014-2019 cubrirá las áreas no incorporadas del Condado y las siguientes ciudades cooperantes: Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Indian Wells, La Quinta, Murrieta, Norco, y San Jacinto. La ciudad Metro conjunta de Lake Elsinore también se incluye dentro del programa CDBG del Condado.

Para cumplir con los requisitos federales en la preparación del Plan Consolidado, el Condado de Riverside pendra un período de comentarios públicos de 30 días, el cual comienza el 4 de abril 2104. Se prevé que la Junta de Supervisores adoptará el Plan Consolidado y el Plan de Acción de Un Año en la reunión usual del 6 de mayo de 2014. El Plan Consolidado será entonces enviado al Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos, en o alrededor del 15 de mayo 2014, para su revisión y aprobación final.

**Comentarios y Críticas del Ciudadano:** las personas afectadas podrán ver los proyectos '2014-2019 Consolidated Plan', '2014-2015 One-Year Action Plan', el 'Citizen Participation Plan for the 2014-2019 Five-Year Consolidated Plan', y el 'Fair Housing Impediment Study' comenzando el 4 de abril, 2014, en los siguientes lugares:

Riverside County Economic Development Agency-Community Services Division  
3403 10th Street Suite 400, Riverside, CA 92501  
(951) 955-8916

Riverside County Economic Development Agency-Indio  
44-199 Monroe Street Suite B, Indio, CA 92201  
(760) 863-2650

Los comentarios escritos pueden enviarse a las direcciones indicadas arriba antes de las 4:00 pm del 5 de mayo del 2014. Los comentarios también se pueden enviar por correo electrónico a [mmvaldivia@rivcoeda.org](mailto:mmvaldivia@rivcoeda.org).

Todos los documentos de los proyectos también se pueden ver en línea en [www.rivcoeda.org](http://www.rivcoeda.org). Además, se pondrán a disposición del público copias de los borradores de los documentos para revisar, en varios lugares del condado. Una lista de estas ubicaciones están en línea en [www.rivcoeda.org](http://www.rivcoeda.org), o poniéndose en contacto con Melissa Valdivia al (951) 955-8916 o por correo electrónico [mmvaldivia@rivcoeda.org](mailto:mmvaldivia@rivcoeda.org).

Si tiene alguna pregunta o necesita información adicional, por favor póngase en contacto con Melissa Valdivia en (951) 955-8916 o por correo electrónico [mmvaldivia@rivcoeda.org](mailto:mmvaldivia@rivcoeda.org).

Thurman, EDA Development Manager-CDBG/ESG Programs

# Funding Approval/Agreement

Title I of the Housing and Community Development Act (Public Law 930383)  
 HI-00515R of 20515R

# U.S. Department of Housing and Urban Development

Office of Community Planning and Development  
 Community Development Block Grant Program OMB Approval No.  
 2506-0193 (exp 1/31/2015)

1. Name of Grantee (as shown in item 5 of Standard Form 424) County of Riverside		3a. Grantee's 9-digit Tax ID Number: 95-6000930	3b. Grantee's DUNS Number: 064772721	4. Date use of funds may begin (mm/dd/yyyy): 7/1/2014
2. Grantee's Complete Address (as shown in item 5 of Standard Form 424) 3403 Tenth Street, Suite 500 Riverside, CA 92501		5a. Project/Grant No. 1 B-14-UC-06-0506		6a. Amount Approved \$7,442,595
		5b. Project/Grant No. 2		6b. Amount Approved
		5c. Project/Grant No. 3		6c. Amount Approved

**Grant Agreement:** This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC 5301 et seq.). The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions/addendums, constitute part of the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval. The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58. The Grantee further acknowledges its responsibility for adherence to the Agreement by sub-recipient entities to which it makes funding assistance hereunder available.

U.S. Department of Housing and Urban Development (By Name) William Vasquez		Grantee Name Jeff Stone
Title Director, Office of Community Planning and Development		Title Chairman
Signature 	Date (mm/dd/yyyy) 9/26/14	Signature 
		Date (mm/dd/yyyy) 10/2/14

7. Category of Title I Assistance for this Funding Action (check only one) <input checked="" type="checkbox"/> a. Entitlement, Sec 106(b) <input type="checkbox"/> b. State-Administered, Sec 106(d)(1) <input type="checkbox"/> c. HUD-Administered Small Cities, Sec 106(d)(2)(B) <input type="checkbox"/> d. Indian CDBG Programs, Sec 106(a)(1) <input type="checkbox"/> e. Surplus Urban Renewal Funds, Sec 112(b) <input type="checkbox"/> f. Special Purpose Grants, Sec 107 <input type="checkbox"/> g. Loan Guarantee, Sec 108	8. Special Conditions (check one) <input type="checkbox"/> None <input checked="" type="checkbox"/> Attached	9a. Date HUD Received Submission 5/14/2014	10. check one <input checked="" type="checkbox"/> a. Orig. Funding Approval <input type="checkbox"/> b. Amendment Amendment Number
		9b. Date Grantee Notified 9/24/2014	
		9c. Date of Start of Program Year 7/1/2014	

11. Amount of Community Development Block Grant			
	FY (2014)	FY ( )	FY ( )
a. Funds Reserved for this Grantee	\$7,442,595		
b. Funds now being Approved	\$7,442,595		
c. Reservation to be Cancelled (11a minus 11b)	-0-		

12a. Amount of Loan Guarantee Commitment now being Approved	12b. Name and complete Address of Public Agency
<b>Loan Guarantee Acceptance Provisions for Designated Agencies:</b> The public agency hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided it.	12c. Name of Authorized Official for Designated Public Agency
	Title
	Signature

## HUD Accounting use Only

Batch	TAC	Program	Y	A	Reg	Area	Document No.	Project Number	Category	Amount	Effective Date (mm/dd/yyyy)	F
	153											
	176											
			Y					Project Number		Amount		
			Y					Project Number		Amount		

Date Entered PAS (mm/dd/yyyy)	Date Entered LOCCS (mm/dd/yyyy)	Batch Number	Transaction Code	Entered By	Verified By
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ATTEST:  
 KEGIA HARPER IHEM, Clerk  
 By   
 DEPUTY

05.06.14 9-1

FORM APPROVED BY COUNTY COUNSEL (11/10)  
 BY   
 JHAILA R. BROWN DATE 10/2/14

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)  
SPECIAL CONDITIONS**

**Executive Order 12372**

The special condition for the Community Development Block Grant Program, Funding Approval Agreement (HUD 7082), concerning the review procedures under Executive Order 12372 – Intergovernmental review of Federal Programs and HUD's implementing regulations 24 CFR, Part 52, restricts the obligation or expenditure of funds for the planning or construction of water or sewer facilities until the completion of the review process and receipt of written notification of a Release of Funds from HUD. In the event that the grantee amends or otherwise revises its Consolidated Plan/Action Plan to use funds for the planning or construction of water or sewer facilities, a written Release of Funds notice from the Department must be obtained before obligating or expending funds for such activities.

In addition to the conditions contained on form HUD 7082, the grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Dun and Bradstreet Data Universal Numbering System (DUNS), the Central Contractor Registration (CCR) database which was converted to the System for Award Management (SAM), and the Federal Funding Accountability and Transparency Act as provided in 2 CFR part 25, Universal Identifier and Central Contractor Registration, and 2 CFR part 170, Reporting Subaward and Executive Compensation Information.

The grantee shall ensure that no CDBG funds are used to support any Federal, State, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. For the purposes of this requirement, public use shall not be construed to include economic development that primarily benefits private entities. Any use of funds for mass transit, railroad, airport, seaport or highway projects as well as utility projects which benefit or serve the general public (including energy-related, communication-related, water-related and wastewater-related infrastructure), other structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Public Law 107-118) shall be considered a public use for purposes of eminent domain.

The Grantee or a unit of general local government that directly or indirectly receives CDBG funds may not sell, trade, or otherwise transfer all or any such portion of such funds to another metropolitan city, urban county, unit of general local government, or Indian tribe, or insular area that directly or indirectly receives CDBG funds in exchange for any other funds, credits or non-Federal considerations, but must use such funds for activities eligible under Title I of the Housing and Community Development Act of 1974, as amended.

**Funding Approval and HOME Investment Partnerships Agreement**  
 Title II of the National Affordable Housing Act

U.S. Department of Housing and Urban Development  
 Office of Community Planning and Development

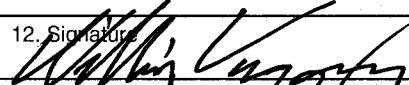
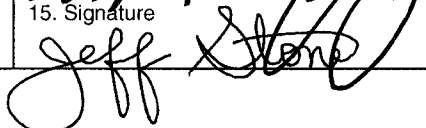
Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

1. Participant Name and Address County of Riverside  3403 Tenth Street, Suite 500  Riverside, CA 92501		2. Participant Number M-14-UC-06-0530	
		3. Tax Identification Number 95-6000930	4. DUNS Number 064772721
		4. Appropriation Number	5. FY (yyyy) 2014
6. Previous Obligation (Enter "0" for initial FY allocation)			\$0.00
a. Formula Funds		\$	
b. Community Housing Development Org. (CHDO) Competitive		\$	
7. Current Transaction (+ or -)			\$
a. Formula Funds		\$1,774,543	
1. CHDO (For deobligations only)		\$	
2. Non- CHDO (For deobligations only)		\$	
b. CHDO Competitive Reallocation or Deobligation (see #18 below)		\$	
8. Revised Obligation			\$
a. Formula Funds		\$	
b. CHDO Competitive Reallocation		\$	
9. Special Conditions (check applicable box) <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Attached		10. Date of Obligation (Congressional Release Date) (mm/dd/yyyy) 9/24/2014	

This Agreement between the Department of Housing and Urban Development (HUD) and the Participating Jurisdiction/Entity is made pursuant to the authority of the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.). The Participating Jurisdiction's /Entity's approved Consolidated Plan submission/Application and the HUD regulations at 24 CFR Part 92 (as is now in effect and as may be amended from time to time) and this HOME Investment Partnership Agreement, form HUD-40093, including any special conditions\*, constitute part of this Agreement. Subject to the provisions of this Agreement, HUD will make the funds for the Fiscal Year specified, available to the Participating Jurisdiction/Entity upon execution of this Agreement by the parties. All funds for the specified Fiscal Year provided by HUD by formula reallocation are covered by this Agreement upon execution of an amendment by HUD, without the Participating Jurisdiction's execution of the amendment or other consent. HUD's payment of funds under this Agreement is subject to the Participating Jurisdiction's/Entity's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 92.502. To the extent authorized by HUD regulations at 24 CFR Part 92, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Participating Jurisdiction/Entity without the Participating Jurisdiction's/Entity's execution of the amendment or other consent. The Participating Jurisdiction/Entity agrees that funds invested in affordable housing under 24 CFR Part 92 are repayable when the housing no longer qualifies as affordable housing. Repayment shall be made as specified in 24 CFR Part 92. The Participating Jurisdiction agrees to assume all of the responsibility for environmental review, decision making, and actions, as specified and required in regulation at 24 CFR 92.352 and 24 CFR Part 58.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Dun and Bradstreet Data Universal Numbering System (DUNS), the System for Award Management (SAM) (SAM replaces CCR), and the Federal Funding Accountability and Transparency Act (FFATA), including Appendix A to Part 25 of the Financial Assistance Use of Universal Identifier and Central Contractor Registration, 75 Fed. Reg. 55671 (Sept. 14, 2010) (to be codified at 2 CFR part 25) and Appendix A to Part 170 of the Requirements for Federal Funding Accountability and Transparency Act Implementation, 75 Fed. Reg. 55663 (Sept. 14, 2010) (to be codified at 2 CFR part 170).


11. For the U.S. Department of HUD (Name and Title of Authorized Official) William Vasquez, Director, Community Planning and Development		12. Signature 	13. Date 9/24/2014
14. For the Participating Jurisdiction/Entity (Name and Title of Authorized Official) Jeff Stone, Chairman, Board of Supervisors		15. Signature 	16. Date 10/2/14

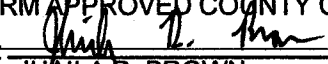
17. Check one:  
 Initial Agreement     Amendment #

18. Funding Information: HOME  
 Source of Funds    Appropriation Code    PAS Code    Amount  
 86 4/60205    \$

ATTEST:  
 KECIA HARPER-IHEM, Clerk \$

FORM APPROVED COUNTY COUNSEL

By  DEPUTY

BY:  10/2/14  
 JHAILA R. BROWN    DATE

# Funding Approval/Agreement

Emergency Solutions Grants Program  
 Subtitle B of Title IV of the McKinney-Vento Homeless  
 Assistance Act, 42 U.S.C. 11371 et seq.

U.S. Department of Housing and Urban Development  
 Office of Community Planning and Development

1. Recipient Name and Address  
 County of Riverside  
 3403 Tenth Street, Suite 500  
 Riverside, CA 92501

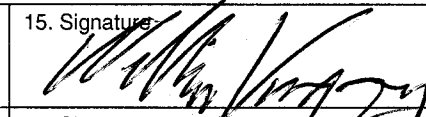
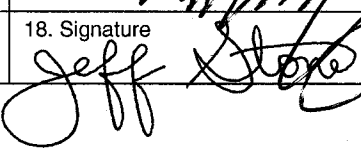
2. Grant number: E-14-UC-06-0506

3. Tax Identification Number	95-6000930
4. DUNS Number	064772721
5. Fiscal Year (yyyy)	2014
6. Previous Obligation (Enter "0" for initial Fiscal Year allocation)	\$
7. Current Transaction (+ or -)	\$583,301
8. Revised Obligation	\$

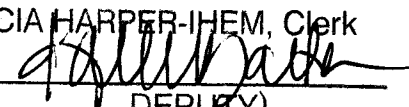
9. Date of Start of Recipient's Program Year (mm/dd/yyyy) 07/01/2014	10. Date HUD Received Recipient's Consolidated Plan Submission (mm/dd/yyyy) 05/14/2014	11. Date On Which Recipient May Begin Incurring Costs (the later of the dates listed in 9 and 10) (mm/dd/yyyy) 07/01/2014
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12. Type of Agreement (check applicable box) <input checked="" type="checkbox"/> Initial Agreement (Purpose #1 – Initial Fiscal Year allocation) <input type="checkbox"/> Amendment (Purpose #2 – Deobligation of funds) <input type="checkbox"/> Amendment (Purpose #3 – Obligation of additional funds)	13. Special Conditions (check applicable box) <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Attached
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This Agreement between the U.S. Department of Housing and Urban Development (HUD) and the Recipient is made pursuant to the authority of Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq.). The Recipient's Consolidated Plan submissions (including the Recipient's approved annual Action Plan and any amendments completed in accordance with 24 CFR Part 91), the Emergency Solutions Grants Program regulations at 24 CFR Part 576 (as now in effect and as may be amended from time to time), and this Agreement, including any special conditions attached to this Agreement, constitute part of this Agreement. Subject to the terms and conditions of this Agreement, HUD will make the funds for the specified Fiscal Year available to the Recipient upon execution of this Agreement by the Recipient and HUD, and the funds may be used to pay costs incurred on or after the date specified in Box 11 above. All funds for the specified Fiscal Year that HUD provides by reallocation are covered by this Agreement upon execution of an amendment by HUD, without the Recipient's execution of the amendment or other consent. The Recipient agrees to assume all of the responsibilities with respect to environmental review, decision making, and action required under the HUD regulations at 24 CFR Part 58. The Recipient shall also comply with the universal identifier and registration requirements at 2 CFR Part 25, Appendix A to Part 25—Award Term, except that the internet site is now located at [www.sam.gov](http://www.sam.gov) instead of [www.ccr.gov](http://www.ccr.gov). Nothing in this Agreement shall be construed as creating or justifying any claim against the federal government or the Recipient by any third party.

14. For the U.S. Department of HUD (Name and Title of Authorized Official) William Vasquez, Director Office of Community Planning and Development	15. Signature 	16. Date (Date of Obligation) 9/26/14
17. For the Recipient (Name and Title of Authorized Official) Jeff Stone, Chairman, Board of Supervisors	18. Signature 	19. Date 10/2/14

Funding Information (HUD Accounting Use Only):  
 PAS Code:  
 Appropriation:  
 Allotment:  
 Program Code:  
 Region:  
 Office:  
 Appro Symbol:

ATTEST:  
 KECIA HARPER-IHEM, Clerk  
 By   
 DEPUTY

05.06.14 9-1

FORM APPROVED COUNTY COUNSEL  
 BY:  DATE: 10/2/14  
 JHILA R. BROWN