

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM
19.1
(ID # 9589)**

MEETING DATE:

Tuesday, June 11, 2019

FROM : ECONOMIC DEVELOPMENT AGENCY (EDA):

SUBJECT: ECONOMIC DEVELOPMENT AGENCY (EDA): Public Hearing on the 2019-2024 Five Year Consolidated Plan, the 2019-2020 One Year Action Plan, the Citizen Participation Plan, and the Analysis of Impediments to Fair Housing Choice, HUD Community Planning and Development Funding, All Districts, [\$0]; CEQA Exempt

RECOMMENDED MOTION: That the Board of Supervisors:

1. Find that the approval and adoption of the 2019-2024 Five Year Consolidated Plan, 2019-2020 One-Year Action Plan, Citizen Participation Plan, and Analysis of Impediments to Fair Housing are exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15061(b)(3);
2. Find that the approval and adoption of the 2019-2024 Five Year Consolidated Plan, 2019-2020 One-Year Action Plan, Citizen Participation Plan, and Analysis of Impediments to Fair Housing are exempt from the National Environmental Policy Act (NEPA) pursuant to Title 24 Code of Federal Regulations Section 58.34(a)(1) and (a)(3);
3. Conduct a public hearing for the 2019-2024 Five-Year Consolidated Plan, 2019-2020 One-Year Action Plan, the Citizen Participation Plan, and the Analysis of Impediments to Fair Housing Choice;

Continued on page 2

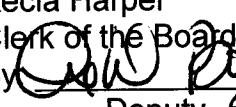
ACTION:Policy

Robert Field, Assistant County Executive Officer/ECD 5/14/2019

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Spiegel, seconded by Supervisor Jeffries and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Jeffries, Spiegel, Washington, Perez and Hewitt
Nays: None
Absent: None
Date: June 11, 2019
xc: EDA

Kecia Harper
Clerk of the Board
By 
Deputy

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RECOMMENDED MOTION: That the Board of Supervisors:

4. Approve and adopt the attached 2019-2024 Five-Year Consolidated Plan and authorize submittal to the U.S. Department of Housing and Urban Development (HUD);
5. Approve and adopted the attached 2019-2020 One-Year Action Plan of the Five-Year Consolidated Plan and authorize submittal to HUD;
6. Approve and adopt the attached Citizen Participation Plan for the 2019-2024 Five-Year Consolidated Plan and authorize submittal to HUD;
7. Approve and adopt the attached 2019 Analysis of Impediments to Fair Housing Choice and authorize submittal to HUD;
8. Authorize the Assistant County Executive Officer/ECD, or designee, to sign the attached Applications for Federal Assistance (SF-424) and the attached Federal Certifications for the CDBG, HOME, and ESG Programs as set forth in the 2019-2020 One Year Action Plan;
9. Authorize the Chair of the Board to execute the Community Development Block Grant (CDBG) Funding Approval Agreement (form HUD-7082), the Home Investment Partnership Act (HOME) Funding Approval Agreement (form HUD-40093), and the Funding Approval/Agreement – Emergency Solutions Grant Program for the programs set forth in the 2019-2020 One Year Action Plan, subject to approval as to form by County Counsel;
10. Authorize the Chair of the Board to execute all necessary Federal Certifications;
11. Authorize the Assistant County Executive Officer/ECD, or designee, to execute, subject to approval as to form by County Counsel, CDBG Sponsor's Agreements, CDBG Supplemental Agreements, and ESG Agreements, by and between the County and the subrecipient, in accordance with the approved 2019-2020 One-Year Action Plan;
12. Authorize the Assistant County Executive Officer/ECD, or designee, to approve, issue, and modify First Time Home Buyer (FTHB) Program loans and disburse program loan funds to qualified low income borrowers in a maximum cumulative total amount not to exceed \$75,000 per household, in accordance with the FTHB program guidelines;

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13. Authorize the Assistant County Executive Officer/ECD, or designee, to take all necessary steps to implement the FTHB Program, including, but not limited to, approving expenditures of funding in the amounts approved by the Board, and drafting, negotiating, and executing, essential and relevant documents, including, but not limited to, Lender Participation Agreements and FTHB loan documents for borrowers such as loan applications, loan agreements, promissory notes, deeds of trust, security agreements, and other agreements, subject to approval by County Counsel;

14. Authorize the Assistant County Executive Officer/ECD, or designee, to make administrative, non-substantive revisions and amendments to the FTHB guidelines, subject to approval by County Counsel; and

15. Authorize the Assistant County Executive Officer/ECD, or designee, to execute all non-substantial amendments to the 2019-2024 Five Year Consolidated Plan and the 2019-2020 One-Year Action Plan as set forth in the Citizen Participation Plan, subject to approval by County Counsel.

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$0	\$0	\$0	\$0
NET COUNTY COST	\$0	\$0	\$0	\$0
SOURCE OF FUNDS: N/A			Budget Adjustment: No	
			For Fiscal Year: 2019/20	

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

Pursuant to 24 CFR Part 91, the County is required to prepare and submit to HUD a Five-Year Consolidated Plan in order to receive Community Planning and Development (CPD) funding over the next five program years (July 1, 2019 – June 30, 2024). The specific federal grant programs are the Community Development Block Grant (CDBG), Home Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG).

The objective of the County's Consolidated Plan is to describe and assess community needs, identify resources, establish priorities, and propose activities to be undertaken over the next five years. This is necessary to address critical housing and community development needs faced by communities, residents, businesses, and other stakeholders, and to satisfy the statutory HUD requirements for the County's (CPD) funded programs.

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The consolidated planning process is guided by three objectives:

- To provide a suitable living environment through safer, more livable neighborhoods, greater incorporation of lower-income residents throughout Riverside County communities, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To provide decent housing by increasing the availability of affordable housing for persons of low- and moderate-income, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To expand economic opportunities through more jobs paying self-sufficiency wages, homeownership opportunities, development activities that promote long-term community feasibility, and the empowerment of lower-income persons to achieve self-sufficiency.

Once approved and adopted by the Board, the Consolidated Plan will then be supplemented each year with a One-Year Action Plan that identifies the specific projects and activities to receive CPD funding in that program year.

In order to comply with public noticing and citizen participation requirements pursuant to 24 CFR 91.105 and the County's Citizen Participation Plan, a draft of the 2019-2024 Five Year Consolidated Plan and 2019-2020 One-Year Action Plan was made available for public review and comment starting May 3, 2019. The draft documents were made available at EDA's offices, on EDA's website, and other locations throughout the County.

On February 5, 2019, the Board of Supervisors conducted a public hearing to obtain the views of residents, services providers, and other organizations regarding housing, community, and economic development needs within the County. The 2019-2020 One-Year Action Plan identifies how the County will use its 2019-2020 allocation of HUD's Community Planning and Development (CPD) funding to address the County's housing and community development needs identified in the 2019-2024 Consolidated Plan. The funding allocations to be received through the 2019-2020 HUD CPD appropriations are: \$7,832,875 CDBG; \$2,321,692 HOME; and \$613,342 ESG.

HOME funds are used to fund the County's First Time Home Buyer (FTHB) Program, as further described in the 2019-2020 One-Year Action Plan. The County regularly conducts training for mortgage lenders applying for certification to participate in the County's FTHB Program. Lenders that participate in the County's program are also required to enter into a participation agreement with the County. Staff desires to streamline the process for assisting households in obtaining loans through the FTHB Program, and for assisting lenders who desire to participate in the program, without increasing administrative costs. To facilitate implementation and administration of the FTHB Program, increase program efficiency, and save administrative costs, staff recommends that the Board delegate to the Assistant County Executive Officer/ECD, or designee, the authority to (i) approve, issue, and modify loans to qualified households in an amount not exceeding \$75,000, in accordance with the FTHB Program

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guidelines, and (ii) draft, negotiate, approve and execute essential and relevant documents, including but not limited to Lender Participation Agreements and FTHB Program loan documents for qualified borrowers such as loan applications, loan agreements, promissory notes, deeds of trust, security agreements, and other agreements, subject to the satisfaction of certain conditions precedent for the benefit of the County, and further subject to approval by County Counsel. The aforementioned will result in increased access to much needed affordable housing within the County.

Staff recommend approval and adoption of the 2019-2024 Five-Year Consolidated Plan, approval and adoption of the 2019-2020 One Year Action Plan, and formal submittal to HUD. The Application for Federal Assistance (Standard Form 424) will be submitted to HUD together with the required certifications and project descriptions. The approved and adopted plans will be available online and at various locations throughout the County.

As part of the 2019-2024 Five Year Consolidated Plan, the County has prepared an updated Citizen Participation Plan. In accordance with 24 CFR Part 91, the Citizen Participation Plan sets forth the County's policies and procedures for citizen participation pursuant to the Housing and Community Development Act of 1974, as amended, and HUD-CPD funding received by the County.

In addition, EDA has prepared an Analysis of Impediments to Fair Housing Choice for the 2019-2024 Five Year Consolidated Plan. In accordance with 24 CFR Part 570.904(c), the Analysis of Impediments serves as the fair housing planning document for the County of Riverside's Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG) programs, and the Housing Authority of the County of Riverside (HACR) programs.

Pursuant to Federal Register Notice Docket No. FR-5173-N-18, published May 23, 2018, the County of Riverside prepared the attached Analysis of Impediments to Fair Housing Choice in accordance with the recommended content and format included in Volumes 1 and 2 of the *Fair Housing Planning Guide* published by the HUD Office of Fair Housing and Equal Opportunity. Upon adoption of the attached Analysis of Impediments, the County shall take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions.

In order to comply with public noticing and citizen participation requirements pursuant to 24 CFR 91.105 and the County's Citizen Participation Plan, a draft of the Citizen Participation Plan and the Analysis of Impediments to Fair Housing Choice were made available for public review and comment starting May 3, 2019. The draft documents were made available at EDA's offices, on EDA's website, and other locations throughout the County.

Staff recommend approval and adoption of the attached Citizen Participation Plan and Analysis of Impediments to Fair Housing Choice.

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Pursuant to the California Environmental Quality Act (CEQA), the approval and adoption of the 2019-2024 Five Year Consolidated Plan, 2019-2020 One-Year Action Plan, Citizen Participation Plan, and Analysis of Impediments to Fair Housing and submittal of the applications to HUD for funding under the three entitlement programs and related activities were reviewed and determined to be categorically exempt for CEQA under State CEQA Guidelines Section 15061(b)(3), General Rule or "Common Sense" exemption. It can be seen with certainty that there is no possibility that the proposed project may have a significant effect on the environment as it will only have administrative effects and will not lead to any direct or indirect physical environmental impacts. The individual activities and projects identified in the 2019-2020 One-Year Action Plan will be subject to a separate CEQA environmental review prior to taking any choice limiting action or discretionary action on those specific projects. A Notice of Exemption will be filed by County staff with the County Clerk within five days of the approval and adoption of the 2019-2020 One-Year Action Plan.

Furthermore, the approval and adoption of the 2019-2024 Five Year Consolidated Plan, 2019-2020 One-Year Action Plan, Citizen Participation Plan, and Analysis of Impediments to Fair Housing and submittal of the applications to HUD for funding under the three entitlement programs and related activities were reviewed and determined to be exempt from the provisions of the National Environmental Policy Act (NEPA) pursuant to Title 24 Code of Federal Regulations Sections 58.34 (a)(1) and (a)(3) since the proposed project is an administrative and planning/strategy activity. The individual activities and projects identified in the 2019-2020 One-Year Action Plan will be subject to separate NEPA environmental review prior to taking any choice limiting action or discretionary action on those specific projects.

Impact on Residents and Businesses

Through the Consolidated Planning process, the County identifies and assesses community needs, establishes priorities, and selects, evaluates, and monitors activities to be undertaken over the next five years of HUD CPD funding. For 2019-2020, the first year of the 2019-2024 planning period, the CPD funding totals \$10,767,909. These CPD funds, together with other resources, will be used to provide a suitable living environment through safer, more livable communities, increased housing opportunities, and reinvestment in deteriorating neighborhoods; provide decent housing by increasing the availability of affordable housing for persons of low and moderate incomes, reducing discriminatory barriers, increasing supply of supportive housing for those with special needs, and rapidly transitioning homeless persons and families into housing; and to expand economic opportunities through job creation, livable wages, homeownership opportunities, development activities that promote long-term community feasibility, and the empowerment of lower-income persons to achieve self-sufficiency.

Additional Fiscal Information

The CDBG, ESG, and HOME programs are 100% federally-funded through HUD's CPD Programs. Portions of these grants include funding for administrative costs. No County General Funds will be used to administer these federal grants.

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Attachments

1. Public Notices
2. 2019-2024 Five-Year Consolidated Plan and 2019-2020 One-Year Action Plan
3. Citizen Participation Plan
4. Analysis of Impediments to Fair Housing Choice
5. Federal Certifications
6. Standard Forms 424 for CDBG, HOME, and ESG programs


Rohini Dasika, Principal Management Analyst 6/3/2019


Gregory L. Priamos, Director County Counsel 5/29/2019

ATTACHMENT 1

**NOTICE OF PUBLIC COMMENT PERIOD
AND
PUBLIC HEARING**

NOTICE OF PUBLIC HEARING

COUNTY OF RIVERSIDE 2019-2024 FIVE YEAR CONSOLIDATED PLAN

Pursuant to *24 CFR Part 91.105(e)(i)* 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 2019-2024 Five Year Consolidated Plan, the 2019-2020 One-Year Action Plan, the Citizen Participation Plan for the 2019-2024 Five Year Consolidated Plan, and the Analysis of Impediments to Fair Housing Choice.

Said public hearing is scheduled for June 11, 2019, at 9:30 a.m., or soon thereafter, 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.

The **Analysis of Impediments to Fair Housing Choice** is: a comprehensive review of the County of Riverside and its participating communities' laws, regulations, and administrative policies, procedures, and practices; an assessment of how those laws, etc. affect the location, availability, and accessibility of housing; an assessment of conditions, both public and private, affecting fair housing choice for all protected classes; and assessment of the availability of affordable, accessible housing in a range of unit sizes; an analysis of actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; and an analysis of any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

The **Citizen's Participation Plan (CPP)** sets forth the County of Riverside's policies and procedures for citizen participation throughout the Consolidated Planning process. The CPP must facilitate citizen participation throughout the Consolidated Plan's initial development, substantial amendment process, and annual performance report. CPP regulations require grantees to actively encourage widespread citizen participation, with a special emphasis on efforts to encourage participation from the following populations: Low- and moderate-income persons; residents of slums, blighted areas, and predominately low- and moderate-income areas; non-English speaking persons; persons with disabilities; public housing residents; and other low-income residents of targeted revitalization areas.

Participating Communities: The 2019-2024 Consolidated Plan encompasses the County of Riverside's Urban County Program which includes the unincorporated areas of the County and the following cooperating cities: Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, La Quinta, Murrieta, Norco, San Jacinto, and Wildomar. 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 May 8, 2019. It is anticipated that the Board of Supervisors will adopt the Consolidated Plan and One Year Action Plan at the regular meeting of June 11, 2019. The Consolidated Plan will then be submitted to the U.S. Department of Housing and Urban Development on or about June 14, 2019, for final review and approval.

Citizen Review and Comments: Concerned individuals may view the draft 2019-2024 Consolidated Plan, 2019-2020 One-Year Action Plan, the Citizen Participation Plan for the 2019-2024 Five-Year Consolidated Plan, and the Analysis of Impediments to Fair Housing Choice, beginning May 8, 2019, at:

- Online at www.rivcoeda.org; and
- Draft documents will also be made available for public viewing at the following locations:

Riverside County EDA
5555 Arlington Ave., Riverside, CA 92504
(951) 955-8916

Riverside County EDA-Indio
44-199 Monroe St., Suite B, Indio, CA
Indio, CA 92201 (760) 863-2650

City of Blythe
235 N. Broadway, Blythe, CA 92225
(760) 922-6161

Anza Library
57430 Mitchell Road, Anza, CA 92539
(951) 763-0657

City of Beaumont
550 E. 6th Street, Beaumont, CA 92223
(951) 769-8520

Valle Vista Library
25757 Fairview Ave, Hemet, CA 92544
(951)927-2611

Mead Valley Charles Meigs Community Center
21091 Rider Street, Perris, CA 92570
(951) 210-1580

Mecca Library
91-260 Avenue 66, Mecca, CA 92254
(760) 396-2363

Lake Elsinore Library
600 West Graham, Lake Elsinore, CA 92530
(951) 674-4517

Written comments may be submitted to 5555 Arlington Avenue, Riverside, CA 92504-2506 no later than 4:00 PM on June 7, 2019. Comments may also be sent via email to sorozco@rivco.org or faxed to (951) 352-4852.

Should you have any questions or need additional information, please contact Susana Orozco at (951) 351-0700 or via email at sorozco@rivco.org.

John Thurman, EDA Development Manager-CDBG/ESG Programs

AVISO DE AUDIENCIA PÚBLICA

PLAN CONSOLIDADO DE CINCO AÑOS 2019-2024 DEL CONDADO DE RIVERSIDE

De acuerdo con el *CFR 24 Parte 91.105(e) (i)* y el Plan de Participación de Ciudadano del Condado de Riverside, NOTIFICA AVISO ES POR ESTE MEDIO que la Mesa de Supervisores del Condado de Riverside llevará a cabo una audiencia pública para considerar las observaciones y/o puntos de vista de los ciudadanos afectados, agencias públicas y otras partes interesadas sobre el Plan consolidado de Cinco Años 2019-2024, el Plan de Acción de un año 2019 -2020, el Plan de Cinco Años Consolidado de Participación de Ciudadanos 2019-2024, y el Análisis de Impedimentos a Opción de Alojamiento Justa.

Dicha audiencia pública está programada para el 11 de Junio de 2019 a las 9:30 am., en la Cámara de Junta de Supervisores, Centro Administrativo del Condado, 4080 Lemon St., 1er piso, Riverside, California, para recibir formalmente los comentarios públicos.

Resumen ejecutivo: 24 CFR Parte 91.105, La Presentación Consolidada para Programa de Desarrollo y Planificación de Comunidad, Regla Final, requiere que el Condado de Riverside prepare un Plan Consolidado para el Condado para recibir fondos Federales para los programas de bajo Subvención de Desarrollo de Comunidad (CDBG), Sociedad de Inversión de Hogar (HOME), y Subvención de Soluciones de Emergencia (ESG). El Plan Consolidado tiene como enfoque los objetivos singulares para consolidar los requisitos de planificación, y aplicación de Planificación y Desarrollo Comunitario (CPD) en una sola presentación. Los objetivos contenidos en este documento de planificación deben desarrollar comunidades viables por asociaciones públicas/privadas proporcionando alojamiento económico decente, un ambiente conveniente, y amplias oportunidades de desarrollo económicas principalmente de personas de bajos y moderados ingresos.

El Análisis de Impedimentos para la Opción de Vivienda Justa es: una revisión completa del Condado de Riverside y las leyes, regulaciones y políticas administrativas, procedimientos y prácticas de comunidades participantes; evaluación de cómo esas leyes, etc. afectan la ubicación, disponibilidad y accesibilidad de vivienda; evaluación de las condiciones, tanto públicas como privadas, que afectan la elección de vivienda justa para todas las clases protegidas; y evaluación de la disponibilidad de viviendas asequibles y accesibles en una gama de tamaños de unidades; un análisis de acciones, omisiones o decisiones tomadas por motivos de raza, color, religión, sexo, discapacidad, estado familiar u origen nacional que restringen las opciones de vivienda o la disponibilidad de opciones de vivienda; y un análisis de cualquier acción, omisión o decisión que tenga el efecto de restringir opciones de vivienda o la disponibilidad de opciones de vivienda por motivos de raza, color, religión, sexo, discapacidad, estado familiar u origen nacional.

El Plan de Participación Ciudadana (CPP) establece las políticas y procedimientos del Condado de Riverside para la participación ciudadana a lo largo del proceso de Planificación Consolidada. El CPP debe facilitar la participación ciudadana a lo largo del inicio del Desarrollo del Plan Consolidado, el proceso de enmienda sustancial e informe de desempeño anual. Las regulaciones de CPP requieren que los beneficiarios animen activamente la participación ciudadana generalizada, con un énfasis especial en los esfuerzos para alentar la participación de las siguientes poblaciones: personas de ingresos bajos y moderados; residentes de barrios humildes, zonas deterioradas, y áreas predominantemente de bajos y moderados ingresos; personas que no hablan

Inglés; personas con discapacidad; residentes de viviendas pública; y o residentes de bajos ingresos de áreas de revitalización específicas.

Comunidades participantes: El plan consolidado 2019 - 2024 abarca el Programa del Condado Urbano del Condado de Riverside, que incluye las áreas no incorporadas del Condado y las siguientes ciudades colaboradoras: Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, La Quinta, Murrieta, Norco, San Jacinto y Wildomar. La Ciudad metro conjunta de Lake Elsinore también esta incluida dentro del programa CDBG del Condado.

Para cumplir con los requisitos federales con la preparación del plan consolidado, el Condado de Riverside llevará a cabo un período de comentarios públicos de 30 días comenzando el 8 de Mayo, 2 019 . Se anticipa que la Mesa de Supervisores adoptará el Plan Consolidado y el Plan de Acción de Un Año en la reunión ordinaria del 11 de Junio de 2019. A continuación el plan consolidado, se enviara al Departamento de Vivienda y Desarrollo Urbano de Estados Unidos en o alrededor del 14 de Junio, 2019, para la revisión y aprobación final.

Revisión de los Ciudadanos y Comentarios: individuos interesados podrán ver el borrador del proyecto del Plan Consolidado 2019-2024, Plan de Acción Anual 2019-2020, Plan Consolidado de Cinco Anos de Participación de Ciudadanos 2019-2024, y el Análisis de Impedimentos para la Opción de Vivienda Justa, un partir del 8 de Mayo de 201 9

- En línea en www.rivcoeda.org ; y
- El borrador de documentos también estará a la disposición del público en los siguientes lugares:

Condado de Riverside EDA
5555 Arlington Ave., Riverside, CA 92504
(951) 955-8916

Condado de Riverside EDA-Indio
44-199 Monroe St., Suite B, Indio, CA
Indio, CA 92201 (760) 863-2650

Ciudad de Blythe
235 N. Broadway, Blythe, CA 92225
(760) 922-6161

Biblioteca de Anza
57430 Mitchell Road, Anza, CA 92539
(951) 763-0657

Ciudad de Beaumont
550 E. 6th Street, Beaumont, CA 92223
(951) 769-8520

Biblioteca de Valle Vista
25757 Fairview Ave, Hemet, CA 92544
(951) 927-2611

Centro Comunitario Mead Valley Charles Meigs
21091 Rider Street, Perris, CA 92570
(951) 210-1580

Biblioteca de Mecca
91-260 Avenue 66, Mecca, CA 92254
(760) 396-2363

Biblioteca de Lake Elsinore
600 West Graham, Lake Elsinore, CA 92530
(951) 674-4517

Los comentarios por escrito se pueden enviar a 5555 Arlington Ave., Riverside, CA 92504-2506 a más tardar a las 4:00 p.m. del 7 de Junio de 2019 . Los comentarios también pueden enviarse por correo electrónico a sorozco@rivco.org o por fax al (951) 352-4852.

Si tiene alguna pregunta o necesita información adicional, comuníquese con Susana Orozco al (951) 351-0700 o por correo electrónico a sorozco@rivco.org .

John Thurman, Gerente de Desarrollo de EDA-Programas CDBG / ESG

<p>ANUNCIOS ANNOUNCEMENTS</p>	<p>ANUNCIOS ANNOUNCEMENTS</p>	<p>Parade THE WEAPON ISSUE</p>	<p>Public Notices</p>
<p>Place a classified ad 24/7 https://adportal.pe.com</p>	<p>WILSON COMPANY CARPENTRY Carpenter ARTI MUYER Respaldada por 25 años de experiencia en el negocio de carpintería de interiores y exteriores. Especialista en remodelación de baños, cocinas, pisos, puertas y ventanas. Se ofrece servicio al cliente y precios competitivos. Contacto: Wilson Company, 1234 Main St, Los Angeles, CA 90001. Teléfono: (310) 555-1234.</p>	<p>Parade THE WEAPON ISSUE</p>	<p>Public Notices AVISO DE ADOPTACIÓN DE LEY... El Poder Judicial de la Federación, en el ejercicio de sus facultades, ha expedido la siguiente Ley: Ley de Adopción de Ley... El Poder Judicial de la Federación, en el ejercicio de sus facultades, ha expedido la siguiente Ley: Ley de Adopción de Ley... El Poder Judicial de la Federación, en el ejercicio de sus facultades, ha expedido la siguiente Ley: Ley de Adopción de Ley...</p>
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El Poder Judicial de la Federación, en el ejercicio de sus facultades, ha expedido el siguiente Plan: Plan Consolidado de Cinco Años 2015-2020 del Comando de Rivero...
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COUNTY OF RIVERSIDE

CITIZEN PARTICIPATION PLAN

24 CFR Part 91.105

**FIVE YEAR CONSOLIDATED PLAN
2019-2024**

MAY 2019

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FORM APPROVED COUNTY COUNSEL
BY:  5/23/2019
AMRIT P. DHILLON DATE

CITIZEN PARTICIPATION PLAN

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 Citizen 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 (CAPER); the Analysis of Impediments; 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 special districts, the Continuum of Care, non-profits and foundations, community organizations, the faith based community, and other stakeholders in the development of all CPD required consolidated planning documents including the Five-Year Consolidated Plan, annual Action Plans, Substantial Amendments, the Assessment of Impediments, 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 Citizen Participation Plan for consistency with the statutory language (i.e., "Citizen 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

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.

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 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 will consider reasonable requests from individuals and organizations to translate CPD related documents and public notices into languages other than English or Spanish.

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*).

Access to Residents of Public and Assisted Housing

It is the policy of the County to encourage participation by residents in public and assisted (affordable) housing in the development of the Consolidated Plan and the Assessment of Impediments. The Housing Division of the Economic Development Agency is located at the Housing Authority of the County of Riverside (HACR) offices and therefore provides a unique opportunity to encourage and include the participation of residents.

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 (February-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 (usually part of a city council 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) 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, substantial amendments, and Analysis of Impediments. All public notices advise and inform interested persons of the process to submit comments and obtain additional information regarding the proposed action. The County will accept comments delivered in writing, orally, faxed, or electronically. 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; the acceptance and use of CPD Disaster Recovery funding, supplemental CPD funding, 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 \$100,000, 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 \$100,000, 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 \$1,000,000, 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 \$1,000,000, or a 100% increase over the current funded amount, whichever is greater.

In an effort to efficiently utilize the County's CPD funding, the County will consider the reprogramming of unspent CDBG, ESG, and HOME balances from completed and cancelled CDBG, ESG, and 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. Administrative reprogramming actions 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.

H. Amendment to Citizen Participation Plan

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

I. Five-Year Analysis of Impediments to Fair Housing Choice

Riverside County will conform to the following procedure in the drafting and adopting the Analysis of Impediments to Fair Housing Choice (Analysis of Impediments):

A. Plan Considerations:

During the development of the Five-Year Analysis of Impediments, Riverside County will consult the following groups/agencies to solicit their input on fair housing issues in the County:

- i. Fair Housing Organizations;
- ii. Other local governments;
- iii. Advocacy groups for special needs households;
- iv. Affordable housing providers;
- v. Banks and other financial institutions; and
- vi. Educational institutions.

A variety of mechanisms may be utilized to solicit input from these groups/agencies. These include telephone or personal interviews, mail surveys, and consultation workshops.

B. Plan Review and Comment:

The draft Analysis of Impediments will be made available for public review for a 30-day period prior to Board of Supervisors consideration at a scheduled public hearing. Written comments will be accepted by the Economic Development Agency or designee during public review period. A summary of the comments received, written and verbal, will be attached to the Analysis of Impediments prior to submission to HUD. Copies will be made available following the process described in this section this document.

C. Public Hearing:

The Board of Supervisors will conduct a public hearing to accept public comments on the draft Analysis of Impediments prior to approval and submittal to HUD. The participating cities within the County's Urban County Program are not required to hold a public hearing, but at a minimum must present the Analysis of Impediments to their respective City Councils and informing the public of Riverside County's public comment period. Section II of this Citizen Participation Plan describes the process for publishing notices for and conducting public hearings.

D. Submittal to HUD:

Upon approval and adoption by the Board of Supervisors, the Analysis of Impediments will be incorporated into the Consolidated Plan and submitted to HUD for approval.

E. Document Access and Comments:

The approved Analysis of Impediments will be kept on file by Riverside County Economic Development Agency at 5555 Arlington Avenue, Riverside, CA 92504 and online at: <https://www.rivcoeda.org/Departments/Housing/Community-Development-Block-Grant/Community-Development/CDBG-Program> and can be made available to those requesting the plan.

J. 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). 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) 351-0700.

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; Analysis of Impediments; 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. 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.

K. RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE POLICY HOME PROGRAM [24 CFR 42.325 and 92.353]

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 Partnerships Act.

All replacement housing will be provided within three (3) 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 ten (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.

L. 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. 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.

M. Technical Assistance

Technical assistance is made available as necessary to groups and organizations representative of persons of low and moderate-income that request 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.

N. 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) 351-0700 or submitted in writing or electronically 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.

III. Monitoring and Evaluation

In accordance with HUD CPD program regulations, the County continually monitors all CPD-funded subrecipients and their activities. The County's current CPD Program Monitoring Policies were developed and adopted in September 2016, through Administrative Program Notice 2016.02.

24 CFR 200.328 (a) provides for the general program monitoring responsibilities of the County in the administration of the HUD-funded CPD programs.

Monitoring and reporting program performance.

(a) Monitoring by the non-Federal entity. The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program function or activity.

Pursuant to 2 CFR 200.328 (a), the County, as the grantee, is also required to monitor grant and subgrant supported activities to assure compliance with applicable regulations governing the subrecipients' administrative, financial, and programmatic activities, to ensure that the subrecipients achieve their performance objectives.

The County's subrecipient monitoring objectives are as follows:

1. To assist the subrecipient in complying with applicable laws and regulations.
2. To assist subrecipients in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
3. To provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by subrecipients, and not repeated.
4. To comply with the Federal monitoring requirements of 24 CFR 570.501(b) and with 2 CFR 200.328 (a), as applicable.
5. To determine if any conflicts of interest exist in the operation of the CDBG program, per 24 CFR 570.611, and 2 CFR 200.112
6. To ensure that required records are maintained to demonstrate compliance with applicable regulations.

IV. Definitions

Analysis of Impediments to Fair Housing Choice (Analysis of Impediments): the Analysis of Impediments is a review of impediments to fair housing choice in the public and private sector. It involves a comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices. It is an assessment of how those laws, etc. affect the location, availability, and accessibility of housing. The Analysis of Impediments assesses the conditions, both public and private, affecting fair housing choice for all protected classes and the availability of affordable, accessible housing in a range of unit sizes.

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

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

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 Partnerships Program, a HUD grant that provides funds to expand the supply of decent and affordable housing for low income households.

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 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.

Moderate Income Persons: An individual from a household with a total income does not exceed one hundred twenty-percent (120%) of the median household income for the area (Riverside-San Bernardino Counties), adjusted for family size.

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.

Predominantly Low and Moderate Income Neighborhood: a recognized community or neighborhood where at least 51% of the population, according to the U.S. Census and American Community Survey (ACS) data, is considered to have incomes at or below the 80% of the median family income for Riverside County.

Very Low Income Persons: An individual from a household with a total income does not exceed fifty-percent (50%) of the median household income for the area (Riverside-San Bernardino Counties), adjusted for family size.

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

Subrecipient: A public or private nonprofit agency, authority or organization, or a for-profit entity receiving CDBG, HOME or ESG funds from the County or another subrecipient to undertake activities eligible for assistance. The term does not include contractors providing supplies, equipment, construction or services subject to the procurement requirements in 2 CFR Part 200, as applicable.

Substantial Amendment: A substantial amendment is a change to the jurisdiction's planned or actual activities as published in the Consolidated Plan or Annual Action Plan. The County has established and published in the Citizen Participation Plan thresholds to define what constitutes a substantial amendment.

ATTACHMENT 5

FEDERAL CERTIFICATIONS

CDBG, HOME, AND ESG

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

Date

Assistant County Executive Officer/ECD

Title

FORM APPROVED COUNTY COUNSEL

BY: AMRIT P. DHILLON 5/22/2019 DATE

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019, 2020, and 2021 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Date

Assistant County Executive Officer/ECD

Title

FORM APPROVED COUNTY COUNSEL

BY: APD

AMRIT P. DHILLON

5/22/2019

DATE

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature of Authorized Official

Date

Assistant County Executive Officer/ECD

Title

FORM APPROVED COUNTY COUNSEL

BY:

APD
AMRIT P. DHILLON

5/22/2019

DATE

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature of Authorized Official

Date

Assistant County Executive Officer/ECD

Title

FORM APPROVED COUNTY COUNSEL
BY: APD 5/22/2019
AMRIT P. DHILLON DATE

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official

Date

Assistant County Executive Officer/ECD

Title

FORM APPROVED COUNTY COUNSEL
BY: APD 8/22/2019
AMRIT P. DHILLON DATE

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

Date

Assistant County Executive Officer/ECD

Title

FORM APPROVED COUNTY COUNSEL
BY: AMRN P. DHILLON 5/22/2019
DATE

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

FORM APPROVED COUNTY COUNSEL

BY:

APD
AMRIT P. DHILLON

5/22/2019

DATE

ATTACHMENT 6

**FEDERAL GRANT APPLICATIONS
STANDARD FORM 424**

CDBG B-19-UC-06-0506

HOME M-19-UC-06-0506

ESG E-19-UC-06-0506

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): _____ * Other (Specify): _____		
* 3. Date Received: 06/11/2019		4. Applicant Identifier: _____
5a. Federal Entity Identifier: N/A		5b. Federal Award Identifier: B-19-UC-06-0506
State Use Only:		
6. Date Received by State: _____		7. State Application Identifier: _____
8. APPLICANT INFORMATION:		
* a. Legal Name: County of Riverside		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 95-6000930		* c. Organizational DUNS: 0647727210000
d. Address:		
* Street1: 5555 Arlington Avenue		
Street2: _____		
* City: Riverside		
County/Parish: _____		
* State: CA: California		
Province: _____		
* Country: USA: UNITED STATES		
* Zip / Postal Code: 92504-2506		
e. Organizational Unit:		
Department Name: Economic Development Agency		Division Name: Housing Division
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.		* First Name: John
Middle Name: _____		
* Last Name: Thurman		
Suffix: _____		
Title: EDA Development Manager		
Organizational Affiliation: _____		
* Telephone Number: 951-343-5401		Fax Number: 951-343-5609
* Email: jthurman@rivco.org		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:
[Empty field]

Type of Applicant 3: Select Applicant Type:
[Empty field]

* Other (specify):
[Empty field]

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:
Community Development Block Grant Program

*** 12. Funding Opportunity Number:**

N/A

* Title:
N/A

13. Competition Identification Number:

N/A

Title:
N/A

14. Areas Affected by Project (Cities, Counties, States, etc.):

[Empty field]

*** 15. Descriptive Title of Applicant's Project:**

Projected use of Community Development Block Grant Funds

Attach supporting documents as specified in agency instructions.

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="7,832,875.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="7,832,875.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (if "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Assistant County Executive Officer/ECD
APPLICANT ORGANIZATION County of Riverside Economic Development Agency	DATE SUBMITTED

SF-424D (Rev. 7-97) Back

FORM APPROVED COUNTY COUNSEL

BY: AMRIT P. DHILLON 5/22/2019 DATE

Application for Federal Assistance SF-424

* 1. Type of Submission:

- Preapplication
 Application
 Changed/Corrected Application

* 2. Type of Application:

- New
 Continuation
 Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

06/11/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

N/A

5b. Federal Award Identifier:

E-19-UC-06-0506

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

County of Riverside

* b. Employer/Taxpayer Identification Number (EIN/TIN):

95-6000930

* c. Organizational DUNS:

0647727210000

d. Address:

* Street1:

5555 Arlington Avenue

Street2:

* City:

Riverside

County/Parish:

* State:

CA: California

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

92504-2506

e. Organizational Unit:

Department Name:

Economic Development Agency

Division Name:

Housing Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

John

Middle Name:

* Last Name:

Thurman

Suffix:

Title:

EDA Development Manager

Organizational Affiliation:

* Telephone Number:

951-343-5401

Fax Number:

951-343-5609

* Email:

jthurman@rivco.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

Emergency Solutions Grant

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

N/A

Title:

N/A

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Projected use of Emergency Solutions Grant Funds.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="613,342.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="613,342.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.



As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Assistant County Executive Officer/ECD
APPLICANT ORGANIZATION	DATE SUBMITTED
County of Riverside Economic Development Agency	

FORM APPROVED COUNTY COUNSEL

BY:  5/22/2019
 AMRIT P. DHILLON DATE

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: 06/11/2019	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: N/A	5b. Federal Award Identifier: M-19-UC-06-0506	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: County of Riverside		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 95-6000930	* c. Organizational DUNS: 0647727210000	
d. Address:		
* Street1: 5555 Arlington Avenue	_____	
Street2:	_____	
* City: Riverside	_____	
County/Parish:	_____	
* State: CA: California	_____	
Province:	_____	
* Country: USA: UNITED STATES	_____	
* Zip / Postal Code: 92504-2506	_____	
e. Organizational Unit:		
Department Name: Economic Development Agency	Division Name: Housing Division	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.	* First Name: Juan	_____
Middle Name:	_____	
* Last Name: Garcia	_____	
Suffix:	_____	
Title: Principal Development Specialist		
Organizational Affiliation: _____		
* Telephone Number: 951-343-5473	Fax Number: 951-343-5609	
* Email: jugarcia@rivco.org		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Investment Partnership Program

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

N/A

Title:

N/A

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Projected use of HOME Investment Partnership Program Funds.

Attach supporting documents as specified in agency instructions.

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View Attachments

Application for Federal Assistance SF-424

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* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="2,321,692.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
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* g. TOTAL	<input type="text" value="2,321,692.00"/>

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*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

FORM APPROVED COUNTY COUNSEL

BY Amrit P. Dhillion 5/22/2019
AMRIT P. DHILLION DATE

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Assistant County Executive Officer/ECD
APPLICANT ORGANIZATION County of Riverside Economic Development Agency	DATE SUBMITTED

SF-424D (Rev. 7-97) Back

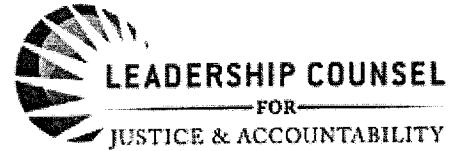
FORM APPROVED COUNTY COUNSEL
 BY: APD 5/22/2019
 AMRIT P. DHILLON DATE

PUBLIC COMMENTS

2019-2024 Five Year Consolidated Plan
2019-2020 One Year Action Plan
2019-2024 Citizen Participation Plan
Analysis of Impediments to Fair Housing Choice

June 11, 2019

6/11/19
19.1



June 10, 2019

Riverside County, Economic Development Agency
John Thurman, CDBG-ESG Program Administrator
Riverside County EDA - Housing Division
5555 Arlington Avenue Riverside, CA 92504
Email: jthurman@rivco.org 951-351-0700

Re: Comments on the County of Riverside's 2019-2024 Draft Consolidated Plan

Dear Mr. John Thurman,

Thank you for the opportunity to submit our comments to you on the County of Riverside's 2019- 2024 Draft Consolidated Plan (Draft Plan). Leadership Counsel for Justice and Accountability works alongside community residents to ensure that programs and policies do not disadvantage but rather benefit and advance the priorities of low income communities of color. Since its inception, Leadership Counsel has worked directly with residents of disadvantaged unincorporated communities and in cities in the East Coachella Valley to ensure open and inclusive public processes and advance access in those communities to safe and affordable drinking water, wastewater infrastructure, active transportation infrastructure, public transportation, decent affordable housing and infill development, and a healthy environment.

These comments aim to assist the County in developing a Final Consolidated Plan (Final Plan) that will allow the County to achieve the goal of the Department of Housing and Urban Development's (HUD) Community Planning and Development Program (CPD) "to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities," principally for low- and moderate-income persons in accordance with applicable laws and regulations. See 24 CFR 91.1; HUD, The eCon Planning Suite: Citizen Participation Consultation Toolkit (Citizen Participation Toolkit), p. 3.¹ The 2019-2024 Consolidated Plan is a critical opportunity for the County to address the severe affordable housing need in Eastern Coachella Valley and the environmental and neighborhood conditions that impact resident health and well-being that the County must not pass by.

¹ Version: July 2014, Available at

<https://www.hudexchange.info/onecpd/assets/File/eCon-Planning-Suite-Citizen-Participation-Toolkit.pdf>

I. Develop and Implement an Enhanced Public Participation

As written in the Draft Consolidated Plan, "The County of Riverside is the fourth most populated county in the State, consisting of urbanized neighborhoods, suburban cities, and remote, rural communities." It is critical that the County meaningfully engage and allow opportunities for public participation by residents of racially and ethnically concentrated areas of poverty (R/ECAPs) who these funds are intended to benefit. In particular, the County must make a special effort to facilitate participation among residents of the isolated low-income unincorporated rural communities of Thermal, Oasis, Mecca, and North Shore in the Eastern Coachella Valley on the issues that surround the local housing and community development needs and priorities of the communities.

The Code of Federal Regulations (CFR) establishes the consolidated plan as a "collaborative process whereby a community establishes a unified plan of housing and community development actions." Fed. Reg., Vol. 71, No. 27, p. 6950. As such, the regulations place great emphasis on and set forth in clear terms the responsibility of jurisdictions to welcome the engagement of all residents in the consolidated planning process. CFR, Title 24, Section 91.105 (24 CFR § 91.105) provides as follows:

"These requirements are designed especially to encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods, as defined by the jurisdiction. A jurisdiction also is expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities."

Nevertheless, the outreach efforts described in the Draft Plan do not fully satisfy the intention to truly demonstrate an effective and collaborative process to encourage the participation of significant components of the County's richly diverse resident population, including some of the County's residents most impacted by the jurisdiction's lack of affordable housing. Especially, in the communities of the Eastern Coachella Valley where the population's main source of affordable housing are mobile home parks, many in substandard and dilapidated conditions.

Riverside County's community outreach for the Eastern Coachella Valley in developing the Draft Plan consisted of visits to the Mecca-North Shore Community Council on September 12, 2018 and the Thermal-Oasis Community Council on September 24,

2018. No feedback was received at the Mecca-North Shore Community Council as noted in the Draft Plan. Although the community councils are a beneficial asset to the community that provide recommendations to District 4 Supervisor Manuel V. Perez, the council meetings should not be used as the main or only method to conduct outreach considering the turnout is not very large and usually consists of the same members. Therefore, this outreach is not an effective way to solicit input from the thousands of residents of the ECV's rural disadvantaged unincorporated communities and the input obtained at these meetings does not serve to demonstrate the full picture of the needs of the community members that reside in the Eastern Coachella Valley. We recommend outreach be conducted in a more meaningful methods through community meetings and connecting with existing community-based organization with networks in the community.

It is our understanding that the County contacted certain non-profit organizations for input. However, it did not notify or actively seek input from the local community-based organizations of the Eastern Coachella Valley which work directly alongside residents to identify and advance their community development and housing needs and priorities. We recommend the County reach out to these existing community organizations as well as Leadership Counsel for Justice and Accountability to receive input and seek the opportunity for more meaningful participation from the community through community forums in the Eastern Coachella Valley.

Additionally, Urban County Participating Cities were highlighted in the Draft Plan as a component of the outreach and yet no report was included on the outreach those Participating Cities conducted for the Consolidated Plan. Lastly, surveys in English and Spanish were available for community participation but the County did not conduct robust and significant outreach for the surveys that were primarily online where the majority did not include input from the Eastern Coachella Valley. Leadership Counsel staff, who routinely monitor City and County agendas and other forms of public notice for information relevant to the communities with which we work, only found out about the surveys when it came up in search results while researching another unrelated topic concerning housing in Riverside County. Many low-income community members that reside in the Eastern Coachella Valley sometimes do not have access to computers or reliable internet service so an online survey is inaccessible to many residents in the rural portions of Riverside County and not an effective way to seek their input.

Meaningful public participation is necessary to include in the Consolidated Plan on topics of affordable housing and community development that are true to the needs of the community. The needs in the Eastern Coachella Valley are different than those in

urban Riverside County and should be taken into consideration with a more creative and innovative approach to the affordable housing crisis.

II. Eastern Coachella Valley Community Housing Needs

A. Include policies that support ECV Mobile Home Parks in the Final Plan

In the Eastern Coachella Valley, specifically, in the communities of Thermal and Oasis, there is a large concentration of approximately more than 100 mobile home parks and Polanco Parks which are the main source of affordable housing for residents. Additionally, pockets of the ECV also have a high concentration of Tribal Land belonging to the Torres Martinez Desert Cahuilla Indians and to individual tribal members. Many of the mobile home parks are located within tribal jurisdictions, most of which can be found in substandard conditions, however, the ECV provides a limited amount of alternatives. The majority of the population that resides in the ECV are farmworking, but despite the demand, residents still struggle to find stable housing and access to safe drinking water and other basic amenities. Much of the land in communities like Oasis are zoned for agricultural use, much of which the residents who live in the community are farmworkers and yet limited options to affordable housing and safe drinking water.

Additionally, there are a number of unpermitted parks in the region, and while this continues to be an issue for Riverside County, minimal financial assistance is given to supporting community members in bringing their mobile homes and Polanco Parks up to code to improve the existing housing stock and conditions in the Eastern Coachella Valley. Policies that support solutions for mobile home parks should be prioritized.

The rural characteristics of the Eastern Coachella Valley have historically made it difficult for the development of housing. The lack of access to water and wastewater infrastructure continues to pose a challenge for housing development. Policies should support the infrastructure of water and wastewater for communities in the Eastern Coachella Valley that are directly connected to the development of affordable housing. While water and wastewater have been noted as top priorities for residents, there is still a gap in other supporting infrastructure that is necessary to improve the quality of life in the ECV. Mobile homes require upgraded AC and Heating

systems, weatherization for cost and energy efficiency. Mobile home parks need paved roads to reduce residents' exposure to harmful particulate matter, urban greening to aid in energy efficiency, and other supporting infrastructure.

The Draft Plan does not demonstrate goals to improve the conditions of mobile home parks in the Eastern Coachella Valley, considering the main source of housing are mobile homes. A larger emphasis on the needs of mobile homes parks is a priority for many community members and the County should follow those priorities and determine how to best find solutions for the community and address the multitude of issues low-income communities in the Eastern Coachella Valley face everyday.

III. Address farm worker and migrant farm worker housing needs in Riverside County and in the Coachella Valley

As noted in the Draft Plan, the County's goal to address farmworker housing needs through HOME funds for construction and/or rehabilitation of affordable housing units should demonstrate more clear and measurable commitments to mobile homes in the Eastern Coachella Valley where the majority of farmworkers in the County live. The Draft Plan must demonstrate clear goals that truly will address the housing needs of the community members in the Eastern Coachella Valley. Therefore in order to truly understand and plan to address the housing needs of low-income individuals, there must be effective and meaningful outreach to the County's most vulnerable community members.

IV. Eastern Coachella Valley Housing Convening on June 8, 2019

On June 8, 2019, Leadership Counsel for Justice and Accountability hosted an Eastern Coachella Valley Regional Convening on Housing in the community of Oasis at the San Jose Community Center to meet with residents to identify and prioritize their housing needs. Community residents of Thermal, Oasis, Mecca, and Coachella were present to discuss issues on housing, learn about the planning processes, and discuss funding opportunities such as SB 2 and the Consolidated Plan. Through a few activities, residents were able to prioritize their housing needs. A common theme that was noted in the convening was the opportunity for homeownership to residents which is directly related to the popularity of mobile homes in the community. Other community priorities included clear guidance and assistance for the registering and titling of mobile homes,

including the continuation of fee waivers for unpaid back-taxes. For some residents their priority leaned towards the opportunity to acquire new mobile homes given the poor likelihood of their current homes to pass County inspections.. Therefore, new mobile homes are considered a need by many residents to improve their living environment and housing conditions. In fact, residents expressed interest on having the opportunity to buy a new mobile home with a low-interest rate from the County.

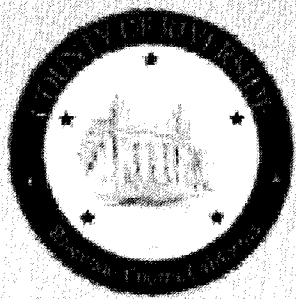
Community residents are aware of the affordable housing crisis that exists in the County and are asking to be meaningful stakeholders in the decision-making process because they are the experts in the community. During the convening, residents expressed interest in these funds and ask that they be used appropriately to also benefit more vulnerable and disinvested communities like the disadvantaged communities of the Eastern Coachella Valley.

* * * * *

Thank you for your consideration of our comments. We look forward to working together to create a consolidated plan that complies with meaningful community outreach that sets the County on a path towards addressing the housing and community development needs of its low-income neighborhoods. We hope that working together we can truly shape a plan that demonstrates the needs of the community members of the Eastern Coachella Valley. Please feel free to contact me at lfigueroa@leadershipcounsel.org or at (760) 972-6337 to find a time to discuss these comments over the phone or in person.

Sincerely,

Lesly Figueroa, Policy Advocate
Leadership Counsel for Justice and Accountability



Draft Analysis of Impediments to Fair Housing Choice 2019-2024

April 2019



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A. Background

The Analysis of Impediments to Fair Housing Choice (A.I.) serves as the fair housing planning document for the County of Riverside Public Housing Authority (PHA) programs that address the entire County, and the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG) programs that address the unincorporated areas of the County, the City of Lake Elsinore (Metro City), and the following Cooperating Cities: Banning, Beaumont, Blythe, Coachella, Canyon Lake, Desert Hot Springs, Eastvale, Indian Wells, La Quinta, Murrieta, Norco, San Jacinto, and Wildomar.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor. The A.I. examines local housing conditions, economics, policies and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

Equal access to housing (housing choice) is vital to meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing this fundamental right, the federal government and the State of California have established fair housing as a right protected by law.

Fair Housing Laws

In an effort to end housing segregation, the United States Congress passed the Civil Rights Act of 1968, making housing discrimination based on race, color, national origin, or religion illegal. In 1974, Congress amended the Fair Housing Act to include sex as a protected category. Then in 1988, Congress again amended the Fair Housing Act by passing the Fair Housing Amendments Act¹, making housing discrimination against families with children and people with disabilities unlawful. The Fair Housing Amendments Act also incorporated accessibility standards for new multi-family units and “reasonable accommodations” for people with disabilities into the Fair Housing Act.

In addition to prohibiting discrimination based on federal laws, the State of California has enacted a number of statutes that mirror and, in certain cases, extend federal fair housing protections. The Unruh Civil Rights Act of 1959² and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges, or services of all business establishments regardless of protected status. The courts have interpreted this Act

¹42 U.S. Code §§ 3601 et. seq.

²California Civil Code, §§ 51 and 52

to prohibit any arbitrary discrimination based in any class distinction, regardless of whether or not that basis is enumerated in the Act.

The Fair Employment and Housing Act of 1963³ is the primary state law that prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992 brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a “mental and physical disability” and “familial status.” The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

The Ralph Civil Rights Act of 1976 provides that all persons have the right to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of their race, color, religion, ancestry, national origin, political affiliation, sexual orientation, sex, age, disability, or position in a labor dispute. The Act prohibits violence or threat of the same in rental housing situations. The Banes Civil Rights Act also forbids interference by force or threat with an individual's constitutional or statutory rights in places of worship, housing, and private property.

The Federal protected classes include:

- Color
- Disability⁴
- Familial status
- National origin
- Race
- Religion
- Sex

The additional State of California protected classes include:

- Age
- Ancestry
- Arbitrary discrimination
- Gender
- Gender identity
- Gender expression
- Genetic information
- Marital status

³California Government Code §§ 12900-12906

⁴ The Fair Housing Act uses the term ‘handicap,’ however, we use the term “person with a disability,” to represent this language of the Act.

- Sexual orientation
- Source of income

This report considers impediments to fair housing choice experienced by both federal and State of California protected classes.

Defining Fair Housing and Impediments

In consideration of federal and state fair housing laws and in consultation with the U.S. Department of Housing and Urban Development (HUD) and professionals providing fair housing services, the following definition of fair housing is used for this report:

Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor.

Within the legal framework of federal and state laws and based on the guidance provided by HUD *Fair Housing Planning Guide* (1996), impediments to fair housing choice can be defined as:

Any actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor.

To affirmatively promote equal housing opportunity, a community must work to remove or mitigate impediments to fair housing choice. Furthermore, eligibility for federal funding assistance requires the County to comply with federal fair housing laws. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

- Certify its commitment to actively further fair housing choice;
- Maintain fair housing records; and
- Conduct an analysis of impediments to fair housing.

The County of Riverside actively furthers fair housing choice through the preparation of this A.I. and annual funding of a fair housing service provider. The County of Riverside is dedicated to providing fair housing opportunities to all residents and ensuring compliance with all applicable laws.

B. Methodology and Citizen Participation

Pursuant to Federal Register Notice Docket No. FR-5173-N-18 published May 23, 2018, the County of Riverside prepared this A.I. in accordance with the recommended content and format included in Volumes 1 and 2 of the *Fair Housing Planning Guide* published by the HUD Office of Fair Housing and Equal Opportunity. Subsequent to adoption of this A.I., the County shall take appropriate actions to overcome the effects of any impediments identified through that analysis and maintain records reflecting the analysis and actions.

Methodology

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a direct recipient of CDBG, HOME, and ESG funds, the County of Riverside is required to update the A.I. every five years and to report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD following each program year. The County's last A.I. was published March 2014. This A.I. is a comprehensive update of the 2014 document, including a Fair Housing Plan for 2019-2024, covering the Consolidated Plan period of July 1, 2019 through June 30, 2024.

The purpose of this report is to identify impediments to fair and equal housing opportunities in Riverside County. This A.I. provides an overview of the laws, regulations, conditions, or other possible obstacles that may affect access to housing and other services in Riverside County.

The A.I. contains these six chapters:

1. *Executive Summary*. This chapter provides background on "fair housing," methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
2. *Community Characteristics*. This chapter provides a brief history of the County, a demographic profile, income profile, employment profile, housing profile, special needs housing profile, and key maps to provide the baseline information necessary to form a complete understanding of the County. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined. Community profile information analyzed in this chapter includes data elements required by HUD in the online Consolidated Plan system (the eCon

Planning Suite) from the 1990, 2000, and 2010 Decennial Census, 2012-2016 American Community Survey (ACS) 5-Year Estimates and the Affirmatively Furthering Fair Housing Tool (AFFH-T) data Version 4.

3. *Analysis of Private Sector Impediments.* This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.
4. *Analysis of Public Policy Impediments.* This chapter identifies and analyzes a range of public activities that may impede fair housing choice, including governmental land use, development regulations, and community development activities. Potential impediments to fair housing choice are discussed.
5. *Analysis of Current Fair Housing Activity.* This chapter includes the current fair housing education, enforcement and legal status of any pending cases currently underway in the County.
6. *Conclusions and Recommendations.* This chapter provides a summary of major issues and recommendations to further fair housing. This chapter also reports on progress made in implementing the prior A.I. This chapter outlines the County's Fair Housing Plan for 2019-2024 including specific actions to be taken to address identified impediments within designated timeframes.

Citizen Participation

The County values citizen input concerning the investment of federal funds. To solicit public participation for this A.I., the County held four Community Meetings at the following locations:

DATE: December 3 (5th District)
TIME: 5:00 - 7:00 p.m.
LOCATION: Cabazon Community Center
50390 Carmen Avenue, Cabazon, CA 92230

DATE: December 5 (3rd District)
TIME: 5:00 - 7:00 p.m.
LOCATION: Murrieta Library Community Room
8 Town Square, Murrieta, CA 92562

DATE: December 6 (4th District)
TIME: 5:00 - 7:00 p.m.
LOCATION: County Workforce Development Center - Room 402
44-199 Monroe Street, Indio, CA 92201

DATE: January 2 (1st District)
TIME: 6:00 p.m. or soon thereafter – 9:00 p.m.
LOCATION: Mead Valley Community Center
21091 Rider Street
Mead Valley, CA 92570

In all, over 20 residents and stakeholders attended the four meetings and their feedback was considered in the development of this A.I.

To further understand the current perspectives of fair housing practices in Riverside County, the County released an “Analysis of Impediments to Fair Housing Choice Survey” to residents in November 2018. The survey consisted of 34 questions related to fair housing issues, community planning needs (such as access to healthcare and transportation), questions regarding schools and questions about the job market. Many of the questions were open-ended, allowing the community to provide additional comments beyond simply answering “yes or no.” The survey was published in English and in Spanish. Links to the surveys were publicized in the public notices for community participation and through email distribution. The survey response period was open for approximately 75 days. During that time, 150 responses were received, many of which contained additional feedback via the open-ended questions. For more information, refer to Appendix D.

After preparing the draft A.I. document, the County published a notice of availability and request for written and oral comments. That notice as published in the Press-Telegram and The Desert Sun. The minimum 30-day public review period began on or about May 2nd and concluded on or about on June 4th. The draft document was accessible in the following locations:

Riverside County Economic Development Agency - CDBG/ESG Programs
5555 Arlington Avenue, Riverside, CA 92504
(951) 351-0700

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

On-line at: www.rivcoeda.org

The County Board of Supervisors will formally consider the A.I. at its regular meeting of June 4, 2019. Comments received concerning the draft A.I. during the public review period and at the public hearing before the Board of Supervisors will be summarized in Appendix C.

C. Status of Prior Impediments and Recommendations

HUD requires the County to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior A.I.s. The 2014 A.I. identified eight fair housing issues including affordable housing, lack of available housing, discrimination against persons with disabilities, rental advertising and viewing the unit, credit check / leasing, predatory lending / steering, habitability / constructive eviction, and Other Lending / Sales Concerns. All but one of these issues were addressed during the prior planning period or were found to not meet the definition of an impediment to fair housing choice. The issue of discrimination against persons with disabilities is supported through data and FHCRC case files documenting that, in large numbers, persons with disabilities experience discrimination in obtaining or maintaining housing in Riverside County. Each of the prior issues are summarized below, including the original issue, the 2019 status and for discrimination against persons with disabilities, a set of recommended actions to be taken over the next five years.

Affordable Housing

The 2014 A.I. identified affordable housing as an impediment to fair housing choice, indicating that “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.” This remains true in 2019. The 2014 A.I. indicated the County Economic Development Agency (EDA) needed to “alleviate governmental constraints which add to the cost of housing and developer costs.” The 2014 A.I. further indicated that the EDA should “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.”

2019 Status: Removed. The 2014 A.I. and the 2019 A.I. update did not reveal specific information indicating that the lack of affordable housing in the community constitutes an impediment to fair housing choice, as defined in this A.I. In other words, the lack of affordable housing in the community is not the result of actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor which restrict housing choices or the availability of housing choices; or, actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor. Rather, the lack of affordable housing is a market condition whereby housing prices are out of reach for many low- and moderate-income wage earners.

Although removed as a listed impediment to fair housing choice in this A.I., it should be noted that the County of Riverside EDA and PHA continue to follow federal and state law with respect to establishing local laws and policies that promote the development of affordable housing and remove unnecessary constraints to such development.

Lack of Available Housing

The 2014 AI identified the lack of available housing as an impediment to fair housing choice, indicating that “Housing shortages increase the probability of housing discrimination by creating competition that can be used to disguise unlawful discrimination practices.” The County Economic Development Agency (EDA) needed to “increase the number of agency-funded affordable single and multi-family housing projects.

2019 Status: Removed. The 2014 A.I. and the 2019 A.I. update did not reveal specific information indicating that the lack of affordable housing in the community constitutes an impediment to fair housing choice, as defined in the AI. In other words, the lack of available housing in the community is not the result of actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor which restrict housing choices or the availability of housing choices; or, actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor. Rather, the lack of available housing is a housing market condition whereby there are an insufficient number of units available to accommodate individuals and households at all income levels.

Although removed as a listed impediment to fair housing choice in this A.I., it should be noted that the County of Riverside EDA and PHA recognize the lack of available housing—particularly for low- and moderate-income people—has the potential to disproportionately affect members of protected classes. For this reason, the County continues to provide as many agency-funded affordable single and multifamily housing opportunities as possible within funding constraints of available programs. These goals are an integral component of the EDA’s Consolidated Plan and the PHA’s Agency Plan submissions to HUD.

Rental Advertising and Viewing the Unit

The 2014 A.I. indicates that “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.”

Further, the 2014 A.I. indicates that “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.”

2019 Status: Addressed. FHCRC continues to provide information and education services concerning the proper way to advertise housing opportunities and to show housing opportunities to prospective tenants. In workshops and fair housing training, FHCRC encourages rental property owners, managers, and realtors 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. Further, FHCRC conducts paired-testing audits under its Fair Housing Initiatives Program grant to identify large-scale abuses such as preferential treatment by management companies and leasing agents based on protected status.

Credit Check / Leasing Issues

The 2014 A.I. indicates that “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.”

Further, the 2014 A.I. indicates that “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.”

2019 Status: Addressed. This issue illustrates the fine line between landlord-tenant issues and bona-fide fair housing discrimination. Over the last five years, FHCRC has encouraged 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. These best practice recommendations serve to protect the interests of both the landlord and the tenant or prospective tenant.

FHCRC quarterly reports for the last five years indicate that over 93 percent of landlord-tenant clientele are in-place tenants. Further, FHCRC reports indicate that repairs and notices under existing leases are the leading case categories for landlord-tenant complaints.

Predatory Lending / Steering

The 2014 A.I. indicates that “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.”

Further, the 2014 A.I. indicates that “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.

2019 Status: Addressed. The 2019 A.I. analyzed the most recent available Home Mortgage Disclosure Act (HMDA) data for 2017 and found that the County and FHCRC have made great strides toward helping low-income and minority purchasers achieve a more level playing field in terms of lending outcomes. In 2017, not one low-income minority group had a loan approval rate (purchase, refinance or home improvement) that was disproportionately lower than non-Hispanic White applicants. Through its private and public grant funding sources, FHCRC provided extensive 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. With respect to steering, there was insufficient publicly available data to support the charge that real estate agents in Riverside County are steering clientele into particular neighborhoods based on protected status. Additionally, HMDA data suggests that at least from a lending perspective, loan approval rates for home purchases were within 10 percentage points when comparing census tracts with high concentrations of minorities as well as for tracts with low concentrations of minorities. Similarly, family income levels for residents of census tracts where loan applicants were applying did not appear to impact lending decisions, as 71 percent of home purchase loans for properties located in low-income census tracts were approved, 77 percent of loans for middle-income tracts were approved, and 75 percent of loans for upper income census tracts were approved.

Habitability / Constructive Evictions

The 2014 A.I. indicates that “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.”

Further, the 2014 A.I. indicates that “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." The 2014 A.I. included a recommendation to "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."

2019 Status: Removed. Upon review, there was insufficient publicly available data to support inclusion of this landlord-tenant issue as an impediment to fair housing choice.

Other Lending / Sales Concerns

The 2014 A.I. indicates that "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." The 2014 A.I. recommended that the County contract with the Fair Housing Council of Riverside County, Inc., to conduct audit testing. 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. Continue homebuyer education programs and ongoing education for participants in the first-time homebuyer program that the Fair Housing Council offers.

2019 Status: Addressed. The County supported the development and expansion of education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by FHCRC. FHCRC provided 20 first-time homebuyer workshops during fiscal year 2017-18.

Discrimination against Persons with Disabilities

Consistent with findings in the 2014 A.I., nearly 63 percent of the discrimination complaints in the County of Riverside over the last five years were on the basis of physical or mental disability. In total, there were 3,108 fair housing complaints surfaced through the work of the Fair Housing Council of Riverside County (FHCRC) over the last five years, with 1,586 or

51.03 percent of all discrimination cases reported on the basis of physical disability and with 370 or 11.90 percent of all discrimination cases reported on the basis of mental disability. These two case categories were the leading causes (first and second, respectively) of discrimination complaints in Riverside County according to FHCRC data. **Table I-1** illustrates the number of disability discrimination cases over the five-year period of study.

**Table I-1
Fair Housing Discrimination Cases in Riverside County**

Basis	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	Total
Number of Disability Discrimination Cases (Physical and Mental)	309	524	402	285	436	1,956

Source: Fair Housing Council of Riverside County Quarterly Reports (2014-2018).

The high proportion of disability complaints to FHCRC is consistent with other communities in the area and is also consistent with data at the state and federal level. Fair housing discrimination on the basis of disability demonstrates a lack of understanding in the housing industry of the housing rights of persons with disabilities. Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

2019 Status: This impediment was addressed during the 2013-2018 planning period through education and outreach to housing providers through workshops, audits, information and referrals. However, given that nearly 63 percent of all fair housing complaints received by FHCRC over the last five years were on the basis of disability, this impediment has not been adequately addressed and remains a high priority in this A.I.

Recommendations: The County of Riverside and its contracted fair housing service provider should continue providing educational opportunities for property owners, property managers, and residents throughout the County to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications, which are some of the leading reasons why persons with disabilities encounter discrimination when seeking housing or attempting to maintain their housing. This could be addressed through workshops, public services announcements, literature distribution and through the provision of landlord-tenant mediation services to address potential discrimination before it occurs.

It is recommended that the County provide for, under contract, multiple workshops per year for the next five (5) years in locations throughout the County focused on the housing rights applicable to persons with physical disabilities and

persons with mental disabilities. The content of these workshops should be tailored to landlords, tenants and government officials (e.g., code enforcement, PHA staff, EDA staff), including a general introduction to fair housing laws and discrimination, and then primarily focus on forms of discrimination against persons with disabilities, such as unreasonably denying or refusing to address requests for reasonable accommodation and modification.

It is further recommended that the County continue contracting with a fair housing service provider for both discrimination and landlord-tenant services. Consultation with fair housing agencies indicates that offering free landlord-tenant services is the best way to identify more serious, but less often reported incidences of discrimination that leads to the types of large-scale pattern-and-practice cases that impact thousands of people each year and have the scale to warrant investigative and legal support from regulatory agencies.

Responsible Entity: County of Riverside.

Timeframe: Each year starting July 1, 2019 and ending June 30, 2024.

D. New Impediments to Fair Housing Choice and Recommendations

This 2019-2024 A.I. revealed the following new impediment and recommendations:

Siting and Standards for Transitional and Supportive Housing

Chapter 4 of this A.I. studies public policies to determine if impediments to fair housing choice exist that negatively affect the ability of members of protected classes to secure or maintain housing. Review of the 2017-2021 Housing Element of the General Plan and County Ordinance 348 governing land use planning and zoning in the County of Riverside revealed that transitional and supportive housing are not currently defined in the Ordinance and are not treated as a permitted use in residential zones.

Recommendation: Implement Action 1.5c of the Housing Element to revise Ordinance 348 to include a definition of transitional housing and supportive housing that is consistent with State of California Health and Safety Code Sections 50675.14 and 50675.2; and, revise the Ordinance to list transitional and supportive housing as permitted uses within residential zones.

Responsible Entity: According to Action 1.5c, the County of Riverside Transportation and Land Management Agency (TLMA) is responsible for implementing this recommendation.

Timeframe: No later than June 30, 2020

A. Historical Profile

Riverside County is the fourth largest county in the state by population, stretching nearly 200 miles across and comprising over 7,200 square miles of fertile river valleys, low deserts, natural hot springs, soaring mountains, lush foothills, and rolling plains. Riverside County shares borders with Imperial, Orange, San Diego, and San Bernardino Counties, and extends from within 14 miles of the Pacific Ocean to the Colorado River border with Arizona.

Taking its name from the City of Riverside, the County was formed in 1893 from a small portion of San Bernardino County and a larger part of San Diego County.

Before the arrival of Europeans, Riverside County was home to many indigenous inhabitants, among them the Serranos, the Luiseños, the Cupeños, the Chemehuevi, and the Cahuillas, to employ the names given them by Spanish missionaries. Their own languages, some of which are considered extinct, are part of the Uto-Aztecan family of languages, which includes both the Ute language of Utah and the Nahuatl languages (also known as Aztec) of Mexico.

In 1798, Spanish Missionaries established *la Misión de San Luis Rey de Francia* (the Mission of Saint Louis, King of France) in northern San Diego County and designated the Indians living in the region "Sanluiseños," eventually shortened to "Luiseños." Members of the Pechanga Band of Luiseño believe their ancestors have lived in the Temecula area of Riverside County for more than 10,000 years. For the Pechanga, life on earth began in the Temecula Valley. Spanish settlers planted grapes in the favorable climate, and a thriving wine industry was born.

The Spanish and later Mexican governments rewarded retired *soldados de cuera*, or "leather jacket soldiers" who served in frontier garrisons of northern New Spain, with large land grants, known as *ranchos*, for the raising of cattle and sheep. Mexico gained independence from Spain in 1821, and subsequently, the Spanish missions were secularized, their Franciscan officials expelled. The Mexican governor of Alta California at the time, José Figueroa, was opposed to the Híjar-Padrés colonization plan put forth by the Mexican government, which called for the seizure of all mission lands for the benefit of Mexican settlers. Figueroa, himself, a *mestizo* of Spanish and Aztec ancestry, objected to the colonization plan and advocated for the restoration of at least half of the mission lands to the California natives. The Spanish Franciscan missionaries had, after all, administered the missions in trust for the original inhabitants. On August 4, 1834, Figueroa issued a 180-page proclamation setting out a plan for secularization of the missions, which was far more favorable to the native peoples than the Híjar-Padrés plan. The manifesto, published in Monterey in 1835, was the first book published in California. Figueroa's sudden death the same year while the first edition was in preparation ended the dispute.

The region would thereafter experience many violent clashes between non-native settlers

and the indigenous populations over the issue of land rights. Among these was the Temecula massacre, which took place in December 1846 east of present-day Temecula, and during which a combined force of California militia and Cahuilla Indians attacked and killed an estimated 33 to 40 Luiseño Indians. A treaty was negotiated between settlers and the native peoples in 1852, but the U.S. Senate failed to ratify it. The area's land grants were challenged before the California Land Commission in 1851 and the ruling appealed to the district court in 1856 to no avail. The Luiseño were eventually evicted.

Many of the communities that had grown up around the twenty-one California missions became secular *pueblos* (towns). Most of these places kept their previous mission names, by which we know them to this day, among them San Diego, San Juan Capistrano, San Fernando, San Gabriel, and Santa Barbara, to name but a few.

The first land grant in what is now Riverside County, Rancho Temescal, was a Mexican land grant in present-day Temescal Valley. Granted by Governor José María de Echeandía in 1828 to Leandro Serrano, the grant extended along the Temescal Valley south of present-day Corona and encompassed El Cerrito and Lee Lake. In 1838, Rancho Jurupa was awarded to Juan Bandini by Governor Juan B. Alvarado. Located along both banks of the Santa Ana River, the rancho included much of the land in the present day city of Jurupa Valley, as well as the downtown area of the City of Riverside. Other land grants within Riverside County would follow, among them, El Rincón in 1839, Rancho San Jacinto Viejo in 1842, Rancho San Jacinto y San Gorgonio in 1843, Ranchos La Laguna, Pauba, Temecula in 1844, Ranchos Little Temecula and Potrereros de San Juan Capistrano in 1845, Ranchos San Jacinto Sobrante, La Sierra (Sepúlveda), La Sierra (Yorba), Santa Rosa, and San Jacinto Nuevo y Potrero in 1846.

La Placita, originally La Placita de los Trujillos, is the earliest community established in Riverside County, California. The town was informally established soon after 1843 on the Santa Ana River, across from the town of Agua Mansa. La Placita and Agua Mansa were the first non-native settlements in the San Bernardino Valley. Together, they were referred to as "San Salvador," and were the largest settlements between New Mexico and Los Angeles in the 1840s. It is from these settlements that the city of Riverside evolved.

In 1848, with the signing of the Treaty of Guadalupe Hidalgo with Mexico, California became United States territory, and in 1850, California earned statehood. This event precipitated an influx of settlers into the region, among them seekers of health and wealth and personal freedoms, who included gold miners, entrepreneurs, speculators, politicians, adventurers, the ill and infirm, religious refugees, and utopian idealists.

A stagecoach line started a local route from Warner Ranch to Colton in 1857 that passed through Temecula Valley. Within a year, the Butterfield Overland Mail stagecoach line, with a route between St. Louis, Missouri and San Francisco, stopped at Temecula's Magee Store. On April 22, 1859, the first inland Southern California post office was established in Temecula in the Magee Store and the city was incorporated. This was the second post office

in the state, the first being located in San Francisco.

On May 9, 1893, voters approved the formation of Riverside County. The County's seat is the city of Riverside, named for its location on the Santa Ana River. The city is a university town, home to the University of California, Riverside, one of ten University of California campuses.

Riverside is also the birthplace of the citrus industry in California. One of three original orange trees from Bahia, Brazil, given in 1874 to Eliza Tibbets by William Saunders, a friend and horticulturist at the United States Department of Agriculture, still stands to this day inside a protective fence at one of the city's major intersections. The city's own unique California Gold Rush is commemorated in its California Citrus State Historic Park and in the restored packing houses of its downtown Marketplace district. By 1882, there were more than half a million citrus trees in California, almost half of which were in Riverside. Refrigerated railroad cars and innovative irrigation systems established Riverside as the richest city in the United States in terms of per capita income by 1895.

Downtown Riverside's historic Mission Inn, formerly the Glenwood Tavern, is the largest Mission Revival style building in the U.S. It has seen visits by sitting presidents since Benjamin Harrison in 1891. Other visitors included Theodore Roosevelt in 1903, William Howard Taft in 1909, Herbert Hoover in the 1920's and after leaving the White House, John F. Kennedy in 1940, Gerald Ford in 1998, and George W. Bush in 1999 and 2003. The Inn also hosted the nuptials of Richard and Pat Nixon in 1940, and the honeymoon of Ronald and Nancy Reagan in 1952.

Postcards of lush orange groves, swimming pools and magnificent homes have attracted vacationers and entrepreneurs to Riverside throughout the years. Many relocated to the warm, dry climate for reasons of health and to escape Eastern winters. The first golf course and polo field in southern California were built in Riverside. In addition to the draw of Riverside itself, the resort cities of Palm Springs, Palm Desert, Indian Wells, La Quinta, Rancho Mirage, and Desert Hot Springs, located in the Coachella Valley region of central Riverside County, became world-renowned havens for the elite of the burgeoning Hollywood film industry in the twentieth century. Film stars Bob Hope and Dinah Shore brought together the worlds of Hollywood celebrity and professional golf with the popular Bob Hope Desert Classic golf tournament and the Colgate Dinah Shore Winner's Circle, the latter serving to shine a spotlight on the emerging Ladies Professional Golf Association, or LPGA. These resort communities have hosted U.S. Presidents from Dwight Eisenhower, who owned a vacation home in Palm Springs, to Barack Obama, who enjoyed multiple visits and many rounds of golf.

The County is home to Joshua Tree National Park, which straddles Riverside and San Bernardino Counties, north of Palm Springs, Skull Rock Historical Landmark in Twentynine Palms, and Box Spring Mountain Reserve Park in Moreno Valley.

The County is also the location of the March Air Reserve Base, one of the oldest airfields continuously operated by the United States military. Established as the Alessandro Flying Training Field in February 1918, it was one of 32 U.S. Army Air Service training camps established after the United States' entry into World War I in April 1917.

Riverside County has also been at the forefront of the modern Native American Gaming movement. In response to the County government's attempts to shutter their small bingo hall operations in the early 1980s, the Morongo Band of Cahuilla Mission Indians and the Cabazon Band of Mission Indians joined forces. Their legal battle with the County resulted in a favorable ruling in the U.S. Supreme Court on February 25, 1987. Congress then enacted the Indian Gaming Regulatory Act in 1988 to codify the relationship between Indian gaming and state governments. Consequently, both tribes now operate large casinos in the County: the Morongo Casino, Resort & Spa in Cabazon, and the Fantasy Springs Resort Casino in Indio, adjacent to Spotlight 29 Casino in Coachella. The Pechanga Resort & Casino in Temecula is currently one of the top ten employers in the County, with 4,000 employees.

This Analysis of Impediments presents a demographic profile of the County of Riverside. It evaluates the level of housing needs of specific groups, and assesses the availability of a range of housing choices for its residents. The report also contains an analysis of the public and private sectors that examines factors limiting the availability of a range of housing choices, as well as conditions that may hinder a person's fair access to housing. Employment, transportation, and the provision of municipal services all play vital roles in terms of housing choice. In its conclusion, the report provides a practical guide with recommendations as to how to improve fair housing opportunities.

B. Demographic Profile

According to the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation, "The Affirmatively Furthering Fair Housing (AFFH) rule created a standardized process for fair housing planning that program participants use to help meet their longstanding requirement to affirmatively further fair housing. As part of this process, program participants analyze data and other information to assess fair housing issues in their jurisdictions and regions." Data provided by HUD for this demographic profile includes Decennial Census data from 1990, 2000, 2010, data from the Brown Longitudinal Tract Database (LTDB) based on decennial census data, as well as American Community Survey (ACS) 5-year estimates. These data were evaluated, along with local data and local knowledge, to prepare this A.I.

Population Trends

Tables II-1, II-2, II-3 and II-4 below present demographic information and demographic trends both for the jurisdiction and the region. In terms of population growth from the

period between 1990 and the current census, the County of Riverside far outpaces the region. While the region saw significant population growth of 63.2 percent within the period, with the number of area residents rising from nearly 2.6 million to over 4.2 million, the jurisdiction saw explosive growth of 87.05 percent within the same period, from a population of 1,170,628 in 1990 to 2,189,641 residents in 2010. The latest ACS 5-year estimates (2013-2017), show an even greater population surge of 101.2 percent within the County to an estimated 2,355,002 residents.

Age and Sex Characteristics

The County's largest demographic group, residents between 18 and 64 years, grew 91.92 percent since 1990, slightly outpacing the overall population growth rate of 87.05 percent over the period between censuses. While the population of children under age 18 kept pace, with 85.96 percent growth within the same period, the senior population grew at a far slower rate of just over 68 percent. However, seniors in the jurisdiction still outpaced the average regional population growth of 63 percent for their group.

Factoring in 2017 estimates, the largest demographic grew even more demonstrably, with an increase of over 108 percent among 18 to 64 year olds. Seniors kept pace with nearly 106 percent growth, while children under 18 posted the slowest growth rate, at 84 percent.

As percentages of the overall population, the largest demographic, 18 to 64 year-olds, grew in both the jurisdiction and the region, 1.51 and 1.38 percentage points respectively, while the relative populations of children under 18 years and of seniors over age 64 both decreased. Seniors within the jurisdiction decreased in number by the largest overall proportional share, from 13.15 percent of the overall population in 1990 to 11.81 percent in 2010. However, current ACS estimates place the senior population at 13.46 percent of the total, more closely in keeping with 1990 levels. These estimates also place the largest demographic, 18-64 year-olds, at 60.48 percent, 2.12 percentage points higher than 1990 levels. By these recent estimates, the population that is decreasing most sharply within the jurisdiction is children under 18, at 26.06 percent of the total, down from a high of 31.01 percent in 2000 and below the 28.75 percent of this group's population within the region.

In terms of sex, females have historically slightly outnumbered males within the jurisdiction. That trend has continued during the period under review, as women edged out men 50.20 percent to 49.80 percent as of the 2010 census, up slightly from 50.08 percent to 49.92 percent in 1990. Current ACS estimates put the gender gap as consistent with the latest census. This is in keeping with a regional trend that has seen a rise in the female population from 50 percent in 1990 to 50.27 percent in 2010.

Household Profile

Information on household characteristics assists cities and housing providers in understanding

and meeting changing housing needs. The Bureau of the Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households for the purposes of the data.

Table II-1 below compares various household trends in Riverside County. Reflective of the age distribution within the County, families of all types continue to make up the vast share of the County’s population, varying only slightly from 73.6 percent in 2000, to 74.4 percent in 2010, to current estimates of 73.4 percent. As a percentage of overall households, married families with children have been supplanted by married families without children as the largest statistical group, with current estimates as high as 29.82 percent of total households within the County. Perhaps the most significant change since 2000 was the percent increase in the number of “Other Family” households (58.13 percent change), followed closely by married families without children (50.71 percent change). Other Family households consist of a parent of either sex maintaining a household with no spouse present. Interestingly, 2017 ACS data identify the vast majority, 93,976, or 68.64 percent, of these “Other Families,” as “Female householder, no husband present, family household” (S1101). Therefore, single mother households are an emerging demographic within the jurisdiction.

**Table II-1
Households by Household Type**

Household Type	2000		2010		2016		Percent Change
	Number	Percent	Number	Percent	Number	Percent	
Family Households							
- Married With Children	145,009	28.6%	185,194	27.0%	173,225	24.34%	19.46%
- Married Without Children	140,799	27.9%	191,187	27.8%	212,202	29.82%	50.71%
- Other Families	86,578	17.1%	133,860	19.6%	136,905	19.24%	58.13%
Non-Family Households							
- Non-families ¹	133,832	26.4%	176,019	25.6%	189,392	26.60%	41.51%
Total	506,218	100%	686,260	100%	711,724	100%	40.60%
Average Household Size	2.98		3.14		3.26		9.40%

Source: U.S. Census 2000 & 2010, 2013-2017 ACS Five-year Estimates, S1101.

¹ Total of Non-families includes Single Persons.

The last decennial census reports that among the region's families, the percentage with children is 50.99 percent (Table II-3). Table II-4 shows that the percentage of families with children within the jurisdiction is similar to that of the region, at 50.38 percent. Although this percentage has remained fairly constant, there has nonetheless been a surge in absolute numbers of families with children in Riverside, from a low of 142,954 households in 2000, to 257,077 as of 2010, which represents a 79.83 percent increase. Since 1990, households with children have consistently made up half or more of family households overall within both the jurisdiction and the region.

**Table II-2
Demographics of County of Riverside**

Race/Ethnicity	#	%	
White, Non-Hispanic	869,068	39.69%	
Black, Non-Hispanic	130,823	5.97%	
Hispanic	995,257	45.45%	
Asian or Pacific Islander, Non-Hispanic	131,770	6.02%	
Native American, Non-Hispanic	10,931	0.50%	
Two or More Races, Non-Hispanic	48,110	2.20%	
Other, Non-Hispanic	3,682	0.17%	
National Origin			
#1 country of origin	Mexico	298,459	14.44%
#2 country of origin	Philippines	33,760	1.63%
#3 country of origin	El Salvador	13,768	0.67%
#4 country of origin	Guatemala	10,577	0.51%
#5 country of origin	Vietnam	10,163	0.49%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	271,452	13.13%
#2 LEP Language	Tagalog	9,388	0.39%
#3 LEP Language	Chinese	8,042	0.45%
#4 LEP Language	Vietnamese	6,237	0.30%
#5 LEP Language	Korean	5,631	0.27%
Disability Type			
Hearing difficulty		68,771	3.37%
Vision difficulty		43,074	2.11%
Cognitive difficulty		84,592	4.14%
Ambulatory difficulty		125,258	6.13%
Self-care difficulty		52,506	2.57%
Independent living difficulty		87,032	4.26%
Sex			
Male		1,089,576	49.76%
Female		1,100,065	50.24%
Age			
Under 18		620,108	28.32%
18-64		1,310,947	59.87%
65+		258,586	11.81%
Family Type			
Families with children		257,077	50.38%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

**Table II-3
Demographics of Riverside-San Bernardino-Ontario, CA (Region)**

Race/Ethnicity	#	%
White, Non-Hispanic	1,546,666	36.61%
Black, Non-Hispanic	301,523	7.14%
Hispanic	1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic	261,593	6.19%
Native American, Non-Hispanic	19,454	0.46%
Two or More Races, Non-Hispanic	91,476	2.17%
Other, Non-Hispanic	7,737	0.18%
National Origin		
#1 country of origin	Mexico	553,493 13.95%
#2 country of origin	Philippines	62,019 1.56%
#3 country of origin	El Salvador	30,455 0.77%
#4 country of origin	Guatemala	19,549 0.49%
#5 country of origin	Vietnam	19,525 0.49%
Limited English Proficiency (LEP) Language		
#1 LEP Language	Spanish	533,544 13.45%
#2 LEP Language	Chinese	20,495 0.52%
#3 LEP Language	Tagalog	16,986 0.43%
#4 LEP Language	Vietnamese	12,570 0.32%
#5 LEP Language	Korean	11,883 0.30%
Disability Type		
Hearing difficulty		125,033 3.20%
Vision difficulty		86,934 2.23%
Cognitive difficulty		170,114 4.36%
Ambulatory difficulty		241,262 6.18%
Self-care difficulty		102,841 2.63%
Independent living difficulty		170,490 4.37%
Sex		
Male		2,101,083 49.73%
Female		2,123,768 50.27%
Age		
Under 18		1,214,696 28.75%
18-64		2,570,221 60.84%
65+		439,934 10.41%
Family Type		
Families with children		500,062 50.99%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Community Characteristics

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

**Table II-4
Demographic Trends of Riverside**

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	753,905	64.40%	788,702	51.03%	869,068	39.69%	861,271	36.60%
Black, Non-Hispanic	59,750	5.10%	101,329	6.56%	148,460	6.78%	140,810	6.00%
Hispanic	307,284	26.25%	559,444	36.20%	995,257	45.45%	1,130,033	48.00%
Asian or Pacific Islander, Non-Hispanic	38,127	3.26%	69,138	4.47%	152,592	6.97%	149,881	6.40%
Native American, Non-Hispanic	8,175	0.70%	17,412	1.13%	19,309	0.88%	9,584	0.40%
National Origin								
Foreign-born	173,769	14.85%	293,714	19.01%	471,927	21.55%	487,210	22.25%
LEP								
Limited English Proficiency	122,105	10.43%	221,995	14.37%	327,427	14.95%	324,495	14.82%
Sex								
Male	584,222	49.92%	768,093	49.70%	1,089,576	49.80%	1,171,711	49.80%
Female	586,191	50.08%	777,294	50.30%	1,100,065	50.20%	1,183,291	50.20%
Age								
Under 18	333,468	28.49%	479,261	31.01%	620,108	28.32%	613,721	26.10%
18-64	683,055	58.36%	871,293	56.38%	1,310,947	59.87%	1,424,302	60.40%
65+	153,890	13.15%	194,833	12.61%	258,586	11.81%	316,979	13.50%
Family Type								
Families with children	150,415	50.39%	142,954	53.74%	257,077	50.38%	232,869	44.75%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Note 4: Current Jurisdictional Data from 2013-2017 ACS, DP05, Margin of error +/-0.1%.

Note 5: Current Family Type data calculated from ACS 2017 1-Year Estimate, S0201, Margins of error +/-0.7% - 0.8%.

**Table II-5
Demographic Trends of Riverside-San Bernardino-Ontario, CA (Region)**

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	1,615,830	62.41%	1,540,776	47.33%	1,546,666	36.61%	1,546,666	36.61%
Black, Non-Hispanic	168,731	6.52%	263,322	8.09%	336,944	7.98%	301,523	7.14%
Hispanic	685,672	26.48%	1,228,683	37.75%	1,996,402	47.25%	1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic	93,331	3.60%	164,035	5.04%	298,585	7.07%	261,593	6.19%
Native American, Non-Hispanic	18,007	0.70%	36,061	1.11%	36,077	0.85%	19,454	0.46%
National Origin								
Foreign-born	360,666	13.93%	612,354	18.81%	904,558	21.41%	920,860	21.80%
LEP								
Limited English Proficiency	252,012	9.73%	462,538	14.21%	660,791	15.64%	640,802	15.17%
Sex								
Male	1,294,274	50.00%	1,618,466	49.73%	2,101,083	49.73%	2,101,083	49.73%
Female	1,294,518	50.00%	1,636,316	50.27%	2,123,768	50.27%	2,123,768	50.27%
Age								
Under 18	771,845	29.81%	1,044,686	32.10%	1,214,696	28.75%	1,214,696	28.75%
18-64	1,539,215	59.46%	1,869,817	57.45%	2,570,221	60.84%	2,570,221	60.84%
65+	277,732	10.73%	340,280	10.45%	439,934	10.41%	439,934	10.41%
Family Type								
Families with children	350,701	53.60%	266,840	54.97%	500,062	50.99%	500,062	50.99%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except for family type, which is out of total families.

Note 2: Data Sources: Decennial Census, ACS.

Note 3: Refer to the Data Documentation for details (<http://www.hudexchangeinfo/resource/4848/affh-data-documentation>).

Note 4: Current Jurisdictional Data from 2013-2017 ACS, DP05, Margin of error +/-0.1%.

Note 5: Current Family Type data calculated from ACS 2017 1-Year Estimate, S0201, Margins of error +/-0.7% - 0.8%.

Race and Ethnicity

Among other protected characteristics and classes of individuals, the Fair Housing Act prohibits housing discrimination based on race. While HUD provides data on both race and ethnicity, Hispanics of any race are considered for its purposes as a separate race/ethnic category that “can experience housing discrimination differently than other groups.” Therefore, people who identify their ethnicity as Hispanic are excluded from the data provided for the other race groups – Black, Asian and Pacific Islander, Native American, and Other.

A number of generalizations can be made, based upon evaluation of the demographics and demographic trends presented in the tables above. First, the jurisdiction is more White than the region at large. Riverside County's population was 39.69 percent White as of the 2010 census, and is currently 36.60 percent White by latest ACS 5-year estimates. This percentage coincides with the region's 36.61 percent of residents who identify as White. Second, the jurisdiction was less Hispanic than the region at large (45.45 percent vs. 47.25 percent) as of the last census, but surpasses the region by current estimates, at 48 percent. Third, the jurisdiction was slightly less Black than the region (6.78 percent vs. 7.98 percent), with current estimates down to 6.00 percent.

Hispanics outnumber Whites within the jurisdiction, as they do within the region. In terms of growth, the White population within the jurisdiction has followed the negative growth trend of the region, from a high of 64.40 percent of the population in 1990, to 39.69 percent as of the 2010 census. While the White population within the region has actually decreased by 4.28 percent since 1990, with a slight uptick between the 2000 and 2010 censuses, the jurisdiction saw its White population continue to grow in absolute terms through 2010, increasing by 15 percent. However, latest estimates show a decrease in absolute numbers for this group, from a high of 869,068 to an estimated 861,271 currently. Percentages of Whites within the population have declined steadily for both the jurisdiction and the region, from highs of 64.40 percent and 62.41 percent respectively, to current estimates of 36.60 percent and 36.61 percent respectively.

Meanwhile, Non-White populations have experienced astronomic growth within the County during the period. This growth includes a nearly 224 percent population increase among Hispanics in the jurisdiction as of the 2010 census, compared to a 191 percent increase among Hispanics within the region as a whole. That growth rate rises to 268 percent when factoring in current estimates. Similarly, Black populations grew by over 148 percent within the jurisdiction, and by nearly 100 percent within the region. The County's Asian and Pacific Islander population, meanwhile, surged 300 percent within the period from 1990 to 2010, while the same group's numbers within the region climbed nearly 220 percent. The Native American population in the jurisdiction more than doubled in size, growing fully 136 percent, while in the region it posted growth of 100 percent. Current estimates, however, place the numbers significantly lower, at only 8.04 percent higher than 1990 levels.

It is important to note that current ACS 5-year estimates show that only one group continues to increase in real numbers within the jurisdiction. Whereas Whites, Blacks, Asians and Pacific Islanders, and Native Americans have all seen their populations decrease in absolute terms since the last decennial census, the Hispanic population continues its growth trend, with current numbers estimated at 1,130,033.

Foreign Born Population and Limited English Proficiency

In terms of national origin, the largest foreign-born population within the jurisdiction and the region is from Mexico, at 14.44 percent of County residents, compared to 13.95% of the region's residents. After Mexico, the greatest numbers of foreign-born residents of both the County and the region hail from the Philippines, El Salvador, Guatemala and Vietnam. The remaining five most populous non-native groups in the County hail from India, Korea, China (excluding Hong Kong and Taiwan), Canada, and Vietnam, whereas, the region's next most populous non-native groups are from Korea, India, Canada, China and Taiwan.

These foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Riverside residents with Limited English Proficiency (LEP) have significantly increased in number both in real terms and as a proportion of the overall population, from 122,105 residents in 1990, or 10.43% of the total, to current estimates of 324,495, or 14.82% of total County residents. This represents a 166% increase since 1990. Regionally, their proportionate share increased even more dramatically, from 9.73% of the population in 1990 to 15.17% by current estimates. In absolute terms, the numbers of limited English speakers regionally increased 155%.

Racial Integration

As stated in the AFFH-T Data Documentation, HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. These indices are as follows:

1. Dissimilarity Index;
2. Low Poverty Index;
3. School Proficiency Index;
4. Jobs Proximity Index;
5. Labor Market Engagement Index;
6. Low Transportation Cost Index;
7. Transit Trips Index; and
8. Environmental Health Index.

Analysis of these indices shows that with the exception of their ability to access a low transportation costs and proximity to jobs (**Table II-12**, Section D below), residents of the County of Riverside enjoy relative access to opportunity at levels en par with or slightly higher than residents of the region generally. Higher index scores nearly across the board indicate greater access for Riverside residents to opportunity in the important areas of education and employment, and lower exposure to poverty. Further, these scores are consistent across various protected groups, meaning that members of most racial and ethnic groups enjoy a better standard of living by various measures than their counterparts within the greater statistical region.

Dissimilarity Index

According to HUD, “The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups.” (AFFH - T)

As is the case with five of the remaining seven indices presented in **Table II-12** (Section D, below), the County of Riverside’s Racial/Ethnic Dissimilarity Index shown below in **Table II-6** compares favorably to the region in terms of absolute values, meaning that Riverside County is more integrated than the region overall with respect to each of the four groups compared in **Table II-6**.

However, an examination of overall trends reveals a different picture. While the County saw racial segregation in the Black community decline 13.12 percent as of the 2010 census, current estimates show the County trending toward more, not less, segregation within the Black community and across the board. In every category, the County is trending in the direction of more, not less, segregation at a rate that is in keeping with than that of the region overall. With respect to Non-Whites, the level of segregation from Whites, as measured by the Dissimilarity Index, has increased 22.92 percent within the County since 1990. This is slightly less than the regional increase of 25.4 percent during the same period. With the exception of the Black community, in which segregation has ticked up in recent years, but is still statistically declining, this upward trend holds true for the other ethnic/racial groups within the County, as well as for their regional counterparts. Hispanics have become increasingly segregated by a factor of 24.12 percent within the County and 23.59 percent within the region. Asians and Pacific Islanders are faring somewhat better within the County, with their segregation levels increasing by 16.84 percent, compared to 29.85 percent within the region.

The relative degree of segregation within the County as respects these particular communities is shown in **Map II-1** below, wherein concentrations of colored dots represent various races/ethnic groups, with orange dots representing Whites. Each dot represents 50 people. The map reveals high concentrations of orange dots in the Northwest region of the County, especially along the California State Route 91 corridor, beginning near the intersection with California State Route 71 in Corona, and continuing through the Norco area and into the City of Riverside. Other concentrations of White residents, as indicated by orange dots, are found along the Interstate 15 corridor, through the communities of Lake Elsinore, Wildomar, Murrieta, and Temecula. Still other concentrations of White residents are found farther East, in Hemet, as well as in the Coachella Valley communities of Palm Springs, Cathedral City, Rancho Mirage, Palm Desert, Indian Wells, and La Quinta.

Concentrations of Hispanics, represented by blue dots are found in the extreme Northwest of the County in the communities of Mira Loma, Glen Avon, and Rubidoux. Another heavily Hispanic area is found more inland, radiating out from the Perris area, which also has concentrations of Blacks, represented by dark green dots. Still another heavily Hispanic area begins in Indio and stretches southeastward toward the Salton Sea.

**Table II-6
Racial/Ethnic Dissimilarity Trends**

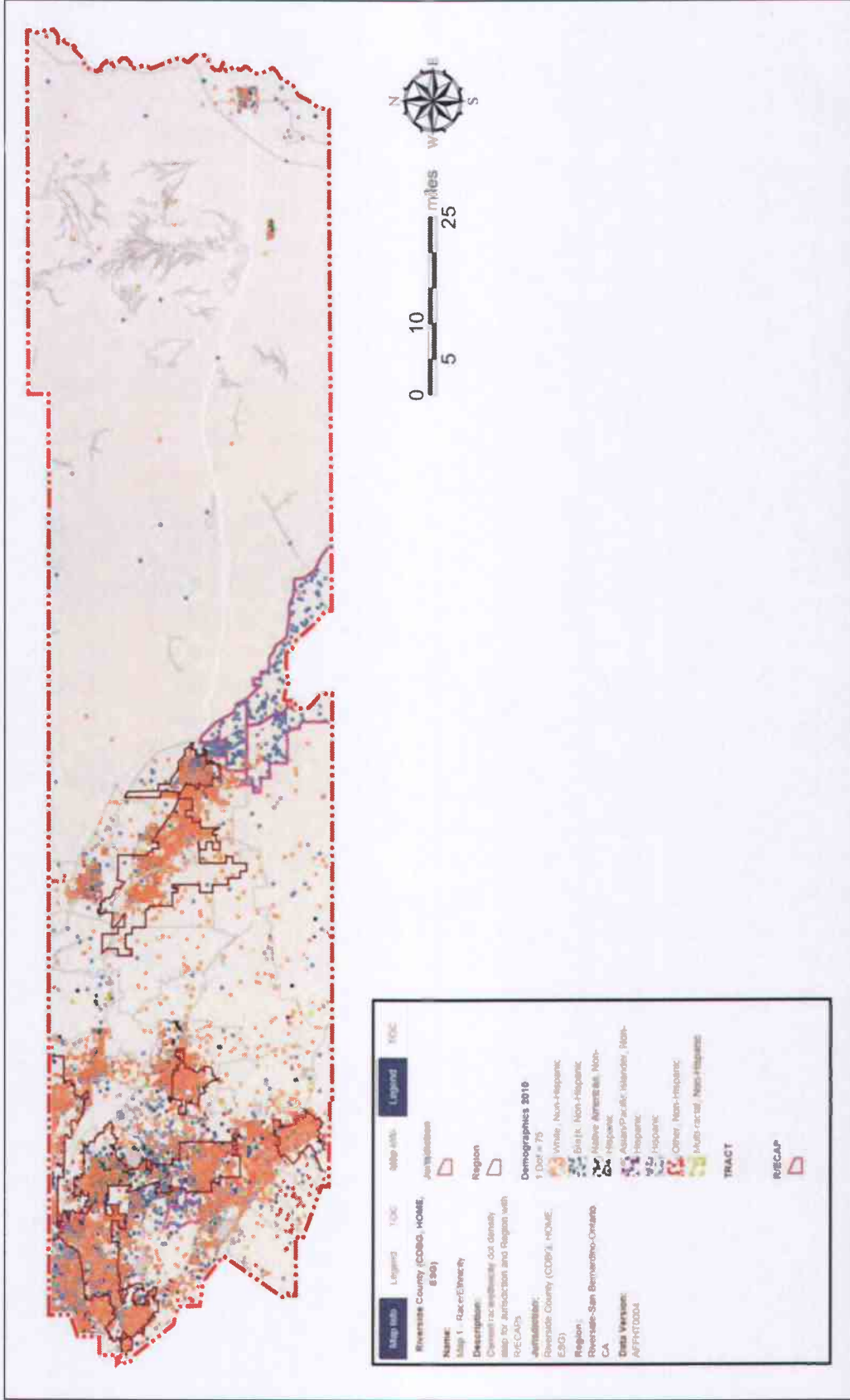
Racial/Ethnic Dissimilarity Index	County of Riverside				(Riverside-San Bernardino-Ontario, CA) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	32.16	38.18	36.71	39.53	32.92	38.90	38.95	41.29
Black/White	46.72	47.08	40.59	44.89	43.74	45.48	43.96	47.66
Hispanic/White	34.33	41.31	40.66	42.61	35.57	42.40	42.36	43.96
Asian or Pacific Islander/White	34.92	35.99	36.36	40.80	33.17	37.31	38.31	43.07

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

Map II-1
Race / Ethnicity



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.