

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



**ITEM: 3.21
(ID # 12535)**

MEETING DATE:
Tuesday, May 19, 2020

FROM: HOUSING, HOMELESSNESS PREVENTION AND WORKFORCE SOLUTIONS:

SUBJECT: HOUSING, HOMELESSNESS PREVENTION, AND WORKFORCE SOLUTIONS (HHPWS): Amendment to the Citizen Participation Plan of the 2019-2024 Five Year Consolidated Plan, Acceptance of Community Development Block Grant-CV Funding Allocation, and Approval of the Substantial Amendment to the 2019-2020 One Year Action Plan of the 2014-2019 Five Year Consolidated Plan to include the Ramsey Street Village, COVID19 Micro-Enterprise Financial Assistance Program, COVID19 Rental Assistance Program, and CDBG-CV Program Administration; All Districts, [\$170,000 - Community Development Block Grant - 3.5%; \$4,941,211, Community Development Block Grant-CV - 96.5%]; CEQA Exempt; (4/5 vote required)

RECOMMENDED MOTION: That the Board of Supervisors:

1. Find that the approval and adoption of the Amended Citizen Participation Plan of the 2019-2024 Five Year Consolidated Plan is 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 Amended Citizen Participation Plan of the 2019-2024, Five-Year Consolidated Plan is exempt from the National Environmental Policy Act (NEPA) pursuant to Title 24 Code of Federal Regulations Section 58.34(a)(1) and (a)(3);


ACTION: Policy, 4/5 Vote Required


Heidi Marshall, Director 5/7/2020

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Perez, seconded by Supervisor Spiegel 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: May 19, 2020
xc: Housing, Auditor

Kecia R. Harper
Clerk of the Board
By: 
Deputy

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STATE OF CALIFORNIA**

3. Find that the substantial amendments to the 2019-2020, One-Year Action Plan of the 2019-2024, Five-Year Consolidated Plan are exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15061(b)(3);
4. Find that substantial amendments to the 2019-2020, One-Year Action Plan of the 2019-2024, Five-Year Consolidated Plan 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);
5. Approve and adopt the attached Amended Citizen Participation Plan for the 2019-2024, Five-Year Consolidated Plan and authorize submittal to HUD;
6. Approve the Substantial Amendment to the 2019-2020, One-Year Action Plan of the 2019-2024, Five-Year Consolidated Plan, to add the new Community Development Block Grant (CDBG) activity Ramsey Street Village, and to add the new Community Development Block Grant-CV (CDBG-CV) activities COVID-19 Micro-Enterprise Financial Assistance Program, COVID-19 Rental Assistance Program, and CDBG-CV Program Administration, more fully described in Attachments A-D, attached hereto, and authorize submittal to HUD;
7. Authorize the Director of Housing, Homelessness Prevention and Workforce Solutions, or designee, to sign the attached Application for Federal Assistance (SF-424) and the attached Federal Certifications for the CDBG-CV Program as set forth in the 2019-2020 One Year Action Plan;
8. Accept the allocation of the Community Development Block Grant-CV (CDBG-CV) funding and authorize the Chairman of the Board to execute the CDBG-CV Funding Approval Agreement (form HUD-7082), subject to approval as to form by County Counsel;
9. Authorize the Director of Housing, Homelessness Prevention and Workforce Solutions, or designee, to execute, subject to approval as to form by County Counsel, all CDBG and CDBG-CV Sponsor and Supplemental Agreements, by and between the County and subrecipients, in accordance with the 2019-2020 One-Year Action Plan;
10. Direct staff to file a Notice of Exemption with the County Clerk within five working days; and
11. Approve and direct the Auditor-Controller to make the budget adjustment as detailed in Schedule A, attached.

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$4,911,211	\$ 0	\$4,911,211	\$ 0
NET COUNTY COST	\$ 0	\$ 0	\$ 0	\$ 0
SOURCE OF FUNDS: Community Development Block			Budget Adjustment:	Yes

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Grant 3.5%, Community Development Block Grant-CV 96.5%	
	For Fiscal Year: 2019/20

C.E.O. RECOMMENDATION: [CEO use]

BACKGROUND:

Summary

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law (Pub.L.116-136). Under the CARES Act, the County was allocated \$4,741,211 of supplemental CDBG funding (CDBG-CV) to be used for eligible activities that prevent, prepare for, and respond to the coronavirus pandemic. To accept and utilize the CDBG-CV funds, the County is required to approve and adopt a substantial amendment to the 2019-2020 One Year Action Plan of the 2019-2024 Five Year Consolidated Plan.

The U.S. Department of Housing and Urban Development (HUD) requires that all substantial amendments to the County's Five-Year Consolidated Plan and the One Year Action Plans are subject to the Citizen Participation Plan and are approved by the Board of Supervisors and HUD. In accordance with the County of Riverside's Citizen Participation Plan for the 2019-2024 Five Year Consolidated Plan (Citizen Participation Plan), all new activities added to a One Year Action Plan, any significant increases in funding or changes to an existing project, or other changes or amendments to the 2019-2024 Five-Year Consolidated Plan are considered to be substantial amendments.

Pursuant to the CARES Act, the County may use expedited procedures for approval and adoption of substantial amendments, for current CDBG funds as well as and CARES Act supplemental CDBG funding (CDBG-CV), for projects and activities that prevent, prepare for, and respond to the coronavirus pandemic. These expedited procedures include a five (5) day minimum public comment period and the suspension of in-person public hearings. Grantees are allowed the option of virtual hearings. HUD requires grantees to amend their Citizen Participation Plans to adopt these expedited procedures. The attached Amended Citizen Participation Plan for the 2019-2024 Five Year Consolidated Plan incorporates those changes. Staff recommend approval and adoption of the Amended Citizen Participation Plan for the 2019-2024 Five Year Consolidated Plan which is necessary to approve the proposed substantial amendments.

The new Community Development Block Grant (CDBG) and Community Development Block Grant-CV (CDBG-CV) projects that are being proposed have been determined by staff to be eligible activities that meet a National Objective of the CDBG program. A description of the proposed amendments to the 2019-2020 One Year Action Plan are set forth in Attachments A through D, attached hereto. Staff recommends approval of the new projects listed below as substantial amendments to the 2019-2020 One Year Action Plan of the 2019-2024 Five Year Consolidated Plan (Substantial Amendment):

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
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Ramsey Street Village (Banning)	\$170,000	Add New CDBG Activity
COVID-19 Micro-Enterprise Financial Assistance Program	\$500,000	Add New CDBG-CV Activity
COVID-19 Rental Assistance Program	\$3,340,000	Add New CDBG-CV Activity
Reserve Funds, CDBG-CV Program Administration	\$901,211	Add New CDBG-CV Activity

Pursuant to the California Environmental Quality Act (CEQA), the approval and adoption of the Amended Citizen Participation Plan and the Substantial Amendment were reviewed and determined to be categorically exempt from CEQA under State CEQA Guidelines Section 15061(b)(3), General Rule or “Common Sense” exemption. The Citizen Participation Plan and the Substantial Amendment are administrative planning documents that will only have financial and administrative effects. It can be seen with certainty that there is no possibility that the proposed Substantial Amendment may have a significant effect on the environment and will not lead to any direct or reasonably indirect physical impacts. The projects identified in the Substantial Amendment will be subject to separate CEQA environmental review prior to taking any choice limiting action or discretionary action on that specific project. A Notice of Exemption will be filed by County staff with the County Clerk within five days of the approval of the Substantial Amendment.

Furthermore, the Amended Citizen Participation Plan and Substantial Amendment were 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 Amended Citizen Participation Plan and Substantial Amendment are administrative activities. The projects identified in the Substantial Amendment will be subject to separate NEPA environmental review prior to taking any choice limiting action or discretionary action on that specific project.

Pursuant to the CARES Act and the Amended Citizen Participation Plan, the Department of Housing, Homelessness Prevention, and Workforce Solutions posted an online public notice of the proposed amendment to the Citizen Participation Plan, the proposed Substantial Amendment, and the five (5) day comment period. The public notice will also published in a newspaper of general circulation. Any comments received prior to the May 19, 2020 Board meeting will be submitted to the Board.

County Counsel has reviewed and approved the Amended Citizen Participation Plan of the 2019-2024, Five-Year Consolidated Plan and the substantial amendments to the 2019-2020, One-Year Action Plans of the 2019-2024 Five Year Consolidated Plan as to form.

Impact on Residents and Businesses

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
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Ramsey Street Village: The City of Banning will use CDBG funds (regular allocation) for costs associated with the Ramsey Street Village project – a homelessness assistance program. Eligible expenses will include the purchase and installation of approximately twenty (20) portable, “Pallet-type” shelters (64 sf), as well as program related operational expenses at the homeless facility including: utilities, supplies, maintenance, staffing, security, outreach, and essential and support services. The project will provide a safe and functional environment for homeless persons and service providers to assist the homeless to transition to self-sufficiency.

COVID-19 Micro-Enterprise Financial Assistance Program: The Riverside County Economic Development Department will use CDBG-CV funds to provide financial assistance to 30-40 microenterprise businesses, located in eligible areas of the County. The businesses must have been financially impacted by COVID-19 and qualify as eligible microenterprise businesses under 24 CFR 570.201(o). CDBG funds will be used for loans, grants, technical assistance, loan fees, loan guarantees, outreach, servicing, compliance, and other required activities.

COVID-19 Rental Assistance Program: The Department of Housing, Homelessness Prevention and Workforce Solutions (HHPWS) will use CDBG-CV funds to pay cost associated with the COVID-19 Rental Assistance Program. HHPWS will allocate CDBG-CV funds to qualified, regional subrecipients to provide the rental assistance to approximately 2,000 eligible households. Priority will be given to eligible households located within the County’s Urban County CDBG Program area. Rental assistance will be limited to three (3) months, not exceeding \$2,500 per household. Eligible expenses will include rental assistance, outreach, staffing, travel, and other program related costs.

Reserve Fund, CDBG-CV Program Administration: The Department of Housing, Homelessness Prevention and Workforce Solutions will set aside a portion of the CDBG-CV funds in an unallocated reserve. These funds can be used for the COVID-19 Micro-Enterprise Financial Assistance Program or the COVID-19 Rental Assistance Program. If these funds are used for another activity, a substantial amendment to the 2019-2020 One-Year Action Plan would have to be approved by the Board. The CDBG-CV funds will also be used to pay costs associated with the administration of the CDBG-CV and ESG-CV programs. CDBG regulations allow the County to expend up to 20% of the CDBG-CV grant on program administrative functions including overall program management, coordination, monitoring, and evaluation.

Additional Fiscal Information

The CDBG and CDBG-CV programs are 100% Federally funded through HUD’s CPD Programs. No County General Funds will be used to administer these federal grants. BOS pre-approved item Minute Traq# 9859, Item 19.1, dated June 11, 2019.

ATTACHMENTS:

- Attachment A-D CDBG and CDBG-CV Project Descriptions (Substantial Amendment)

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
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- Attachment E Amended Citizen Participation Plan of the 2019-2024 Consolidated Plan
- Attachment F Public Notice Requesting Public Comment
- Attachment G Federal Certifications
- Attachment H Standard Forms 424 and 424D for CDBG-CV Program
- Attachment I Notice of Exemption
- Schedule A Budget Adjustment

 Misley Wang, Supervising Accountant	5/7/2020	 Marcus Maltese	5/11/2020
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 Gregory F. Priamos, Director County Counsel	5/8/2020
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SCHEDULE A
Housing, Homelessness Prevention and Workforce Solutions
Budget Adjustment
Fiscal Year 2019/2020

Increase in Appropriations:

21350-1900200000-536200	Contrib. To Other Non-Co Agcy	\$4,911,211
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Increase in Estimated Revenues:

21350-1900200000-763510	CARES Act	\$4,911,211
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SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

ATTACHMENTS A-D

CDBG and CDBG-CV Activity Descriptions

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

Attachment A
2019-2020 One Year Action Plan Amendment

Project: Ramsey Street Village
Eligibility: Public Service 570.201 (e) 05A
Sponsor: City of Banning
Address: PO Box 998, Banning, CA 92220

Funding: \$170,000

Description: The City of Banning will use CDBG funds (regular allocation) for costs associated with the Ramsey Street Village project – a homelessness assistance program. Eligible expenses will include the purchase and installation of approximately twenty (20) portable, “Pallet-type” shelters (64 sf), as well as program related operational expenses at the homeless facility including: utilities, supplies, maintenance, staffing, security, outreach, and essential and support services. The project will provide a safe and functional environment for homeless persons and service providers to assist the homeless to transition to self-sufficiency.

Site Location: 1909 Ramsey Street, Banning, CA (Riverside County)

Benefit: 24 CFR Section 570.208 (a)(2)(i)(A) Low-Mod Income Clientele Presumed

Number Served/Annual Units: 35

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

Attachment B
2019-2020 One Year Action Plan Amendment

Project: COVID19 Micro-Enterprise Financial Assistance Program
Eligibility: Public Service 570.201 (o) 18(c)
Sponsor: County of Riverside – Economic Development
Address: PO Box 1180, Riverside, CA 92502

Funding: \$500,000 (CDBG-CV)

Description: The Riverside County Economic Development Department will use CDBG-CV funds to provide financial assistance to 30-35 microenterprise businesses, located in eligible areas of the County. The businesses must have been financially impacted by COVID-19 and qualify as eligible microenterprise businesses under 24 CFR570.201(0). CDBG funds will be used for loans, grants, technical assistance, loan fees, loan guarantees, outreach, servicing, compliance, and other required activities.

Site Location: Countywide Program

Benefit: 24 CFR Section 570.208 (a)(2)(iii) Limited Clientele Microenterprise

Number Served/Annual Units: 30-35

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

Attachment C
2019-2020 One Year Action Plan Amendment

Project: COVID19 Rental Assistance Program
Eligibility: Public Service 570.201 (e) 05Q
Sponsor: County of Riverside – Housing, Homelessness Prevention and Workforce Solutions
Address: 5555 Arlington Ave, Riverside, CA 92504
Funding: \$3,340,000 (CDBG-CV)

Description: The Department of Housing, Homelessness Prevention, and Workforce Solutions will use CDBG-CV funds to pay cost associated with the COVID19 Rental Assistance Program. HHPWS will allocate CDBG-CV funds to qualified, regional subrecipients to provide the rental assistance to approximately 2,200 eligible households. Priority will be given to eligible households located within the County's Urban County CDBG Program area. Rental assistance will be limited to three (3) months, not exceeding \$2,500 per household. Eligible expenses will include rental assistance, outreach, staffing, travel, and other program related costs.

Site Location: Countywide Program

Benefit: 24 CFR Section 570.208 (a)(2)(i)(A) Low-Mod Income Clientele Presumed

Number Served/Annual Units: 2200 Households

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

Attachment D
2019-2020 One Year Action Plan Amendment

Project: CDBG-CV Reserve Fund / Program Administration
Eligibility: Program Administration 570.206 21A
Sponsor: County of Riverside – Housing, Homelessness Prevention
and Workforce Solutions
Address: 5555 Arlington Ave, Riverside, CA 92504

Funding: \$901,211 (CDBG-CV)

Description: HHPWS will allocate approximately \$368,211 of the CDBG-CV grant to an unallocated reserve or contingency fund. The reserve funds can be used to augment funding for the COVID19 Rental Assistance Program, COVID19 Micro-Enterprise Financial Assistance Program, or other eligible activities that prevent, prepare for, and respond to the coronavirus pandemic. Any new activity will require a substantial amendment to the 2019-20 One-Year Action Plan that must be approved by the Board of Supervisors.

HHPWS will allocate approximately \$130,000 of the CDBG-CV funds to pay for expenses incurred by organizations such as the Fair Housing Council of Riverside County, Inc., that provide outreach, information, eviction/foreclosure hotline, and advocacy to tenants throughout Riverside County during the coronavirus pandemic.

In addition, these funds will be used to pay costs necessary for the overall management and administration of the program. Tasks include program coordination, budgeting, environmental reviews, contract management, recordkeeping, information/reporting, compliance monitoring, payment review and processing, technical assistance, close out, HUD reporting, and program audit. It is anticipated that additional HHPWS accounting staff will be hired to effectively process the substantial increase in payment and reimbursement requests resulting from the COVID19 Rental Assistance Program. Surplus administrative funds will be allocated to the CDBG-CV reserve fund. CDBG regulations permit the County to expend up to 20% of the CDBG-CV grant for overall program administration.

COUNTY OF RIVERSIDE

CITIZEN PARTICIPATION PLAN

24 CFR Part 91.105

**FIVE YEAR CONSOLIDATED PLAN
2019-2024**

AMENDED MAY 2020

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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 sium 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.

FORM APPROVED COUNTY COUNSEL

BY: Amrit P. Dhillon 5/31/2020
AMRIT P. DHILLON DATE

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 Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS) 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 www.rivcoeda.org and www.harivco.org websites.

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.

Notwithstanding the above, the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub.L.116-136) provides for a five (5) day public notice, prior to formal Board of Supervisor action, to provide the opportunity for the public to review and comment on proposed substantial amendments that utilize CDBG-CV funding or current CDBG funding to add or modify activities that prevent, prepare for, and respond to the coronavirus pandemic.

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, CDBG-CV, ESG, ESG-CV, or HOME-funded activities; modification of existing activities; the acceptance and use of CPD Disaster Recovery funding, the acceptance and use of supplemental CPD funding under the CARES Act, 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 Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub.L.116-136), however, provides for a five (5) day public notice, prior to formal Board of Supervisor action, to provide the opportunity for the public to review and comment on proposed substantial amendments that utilize CDBG-CV funding or current CDBG funding to add or modify activities that prevent, prepare for, and respond to the coronavirus pandemic.

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 **\$200,000**, 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 **\$200,000**, 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, **program administration**, 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, CDBG-CV, ESG, ESG-CV, 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.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub.L.116-136), however, provides for a five (5) day public notice, prior to Board of Supervisor action, to amend the Citizen Participation Plan for purposes of receiving CARES Act CDBG funding (CDBG-CV) or modifying existing CDBG funding (substantial amendment) to prevent, prepare for, and respond to the coronavirus pandemic.

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 Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS), 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 the Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS) 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 Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS) current address location and the www.rivcoeda.org and www.harivco.org websites. 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 www.rivcoeda.org and www.harivco.org websites. 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 Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS) 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 HHPWS for review and can be located on the on the www.rivcoeda.org and www.harivco.org websites. 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.

HHPWS 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 HHPWS 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 Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS). 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.

CARES Act: Coronavirus Aid, Relief, and Economic Security Act (Pub.L. 116-136)

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

CDBG-CV: Supplemental CDBG funding authorized under the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub.L. 116-136).

HHPWS: Department of Housing, Homelessness Prevention, and Workforce Solution (HHPWS) – responsible for administration of the County's CDBG, CDBG-CV, HOME, ESG and ESG-CV 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.

ESG-CV: Supplemental ESG funding authorized under the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub.L. 116-136).

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.

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

ATTACHMENT F

Public Notice

Notice of Public Comment Period
Amended Citizen Participation Plan and Substantial Amendment to the 2019-2020
One-Year Action Plan of the 2019-2024 Consolidated Plan

The County of Riverside hereby notifies concerned members of the public, pursuant to 24 CFR 91.105, 24 CFR 91.505, and the County's Citizens Participation Plan, of its intent to amend the Citizen Participation Plan of the 2019-2024 Consolidated Plan and approve and adopt a substantial amendment to the 2019-2020 One-Year Action Plan of the 2019-2024 Consolidated Plan by the following actions:

Ramsey Street Village (Banning)	\$ 170,000	Add New CDBG Activity
COVID19 Micro-Enterprise Financial Assistance Program	\$ 500,000	Add New CDBG-CV Activity
COVID19 Rental Assistance Program	\$3,340,000	Add New CDBG-CV Activity
CDBG-CV Reserve Fund and Program Administration	\$ 901,211	Add New CDBG-CV Activity

These actions are necessary for the County to receive and utilize its allocation of Community Development Block Grant (CDBG-CV) funds made available under the *Coronavirus Aid, Relief, and Economic Security (CARES) Act* (Pub.L. 116-136). Under the Cares Act, the County was allocated \$4,741,211 of supplemental CDBG funding (CDBG-CV) to be used for eligible activities that prevent, prepare for, and respond to the coronavirus pandemic.

A determination regarding the proposed amendment to Citizen Participation Plan of the 2019-2024 Five Year Consolidated Plan and the substantial amendment to the 2019-2020 One Year Action Plan of the 2019-2024 Five Year Consolidated Plan has been scheduled on or about May 19, 2020, at the Riverside County Board of Supervisor's meeting, located at 4080 Lemon Street, Riverside, California.

Important Notice: Due to the COVID-19 pandemic, the Board of Supervisors will only permit public comments during the Board meeting via teleconference. Please select rivcocob.org/comments to complete an e-comment/speaker slip and receive further instructions.

Written comments may be submitted to the following address no later than 12:00 PM on May 18, 2020: Department of Housing, Homelessness Prevention and Workforce Solutions, P.O. Box 1428, Riverside, CA 92504. Comments may also be submitted through email to sorozco@rivco.org, or FAX, 951-343-5474.

Input and comments can also be received by the U.S. Department of Housing and Urban Development, CPD Division, 611 West Sixth Street, Suite 800, Los Angeles, CA 90017. The telephone number is (213) 894-8000. Comments or objections received after May 18, 2020, will not be considered by HUD.

Accommodations under the Americans with Disabilities Act are available upon request. 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.

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

ATTACHMENT G
Federal Certifications

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

Director of Housing, Homelessness Prevention and Workforce Development
Title

FORM APPROVED COUNTY COUNSEL
BY AMRIT P DHILLON 5/5/2020
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

Director of Housing, Homelessness Prevention and Workforce Development
Title

FORM APPROVED COUNTY COUNSEL
BY:  5/7/2020
AMRIT P. DHILLON 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

Director of Housing, Homelessness Prevention and Workforce Development
Title

FORM APPROVED COUNTY COUNSEL

BY

Amrit P Dhillon
AMRIT P DHILLON

5/7/2020
DATE

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

ATTACHMENT H

Standard Forms 424 and 424D for CDBG-CV Program

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:**

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:

Department of HHPWS

Division Name:

Community Solutions

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:

CDBG/ESG Program Administrator

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:

14-218

CFDA Title:

Community Development Block Grant - CV

*** 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 Community Development Block Grant - Coronavirus (CDBG-CV) 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.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="4,741,211.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="4,741,211.00"/>

* 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:

FORM APPROVED COUNTY COUNSEL
BY: *Synthia M. Gunzel* 5/6/2020
SYNTHIA M. GUNZEL DATE

ASSURANCES - CONSTRUCTION PROGRAMS

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 the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and 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 interest in the title of real property in accordance with 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 progress 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 for 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.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE Director of HHPWS
APPLICANT ORGANIZATION County of Riverside	DATE SUBMITTED

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

FORM APPROVED COUNTY COUNSEL
 BY: Synthia M. Gunzel 5-6-2020
 SYNTHIA M GUNZEL DATE

SUBSTANTIAL AMENDMENT TO THE 2019-2020 ONE YEAR ACTION PLAN
May 2020

ATTACHMENT I

Notice of Exemption

CALIFORNIA ENVIRONMENTAL QUALITY ACT

**ENVIRONMENTAL
EXEMPTION DOCUMENTATION**

To: County Clerk and Recorder's Office
County of Riverside
2720 Gateway Drive
Riverside, CA 92507

From: Housing, Homelessness Prevention
& Workforce Development
County of Riverside
PO Box 1428
Riverside, CA 92504

Project Title: Amendment to the Citizen Participation Plan of the 2019-2024 Consolidated Plan and Substantial Amendment to the 2019-2020 One-Year Action Plan of the 2019-2024 Five-Year Consolidated Plan to add the following projects: Ramsey Street Village, \$170,000; COVID19 Rental Assistance Program, \$3,340,000; COVID19 Micro-Enterprise Financial Assistance Program, \$500,000; and CDBG-CV and ESG-CV Program Administration, \$901,211.

Grant No.: B-19-UC-06-0506

Description of Project: Pursuant to 24 CFR Part 570, 24 CFR Part 91, and the Citizens Participation Plan, the Board of Supervisors is authorized to amend the Citizen Participation Plan of the 2019-2024 Consolidated Plan and approve and adopt substantial amendments to the 2019-2020 One Year Action Plan of the 2019-2024 Consolidated Plan for the HUD-funded CDBG and CDBG-CV (CARES Act) programs.

Project Location: Riverside County

Project Proponent: County of Riverside – Housing, Homelessness Prevention, and Workforce Development.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Description: The projects, the amendment to the Citizen Participation Plan of the 2019-2024 Consolidated Plan and the Substantial Amendment to the 2019-2020 One-Year Action Plan of the 2019-2024 Five-Year Consolidated Plan, are planning actions that will only have administrative effects. It can be seen with certainty that there is no possibility that the proposed projects may have a significant effect on the environment and will not lead to any direct or reasonably indirect physical impacts.

Exempt Status: (Check one)

- Ministerial (Section 21080 (b) (1); Section 15268);
- Declared Emergency [Section 21080 (b) (3); Section 15239(a)];
- Emergency Project [Section 21080 (b) (4); Section 15269 (b) (c)];
- Statutory Exemption (Section Number: _____)
- Categorical Exemption: Class 1 (Section Number: _____)
- These activities are not subject to CEQA [pursuant to Section 15061 (b) (3)]**
- Other

Environmental Specialist: _____ Date:
Susana Orozco, Principal Program Manager

Certifying Officer: _____ Date:
John Thurman, CDBG/ESG Program Administrator

Phone: 951-343-5618

From: Nataly Escobedo Garcia <ngarcia@leadershipcounsel.org>

Sent: Monday, May 18, 2020 5:47 PM

To: District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; District2 <District2@Rivco.org>; District5 <District5@Rivco.org>; District3 Information <D3Email@RIVCO.ORG>; COB <COB@RIVCO.ORG>

Cc: Walsh, Michael <MFWalsh@rivco.org>; Rodriguez, Greg L <GRodrigu@rivco.org>; Lesly Figueroa <lfigueroa@leadershipcounsel.org>; Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>; Phoebe Seaton <pseaton@leadershipcounsel.org>; Veronica Garibay <vgaribay@leadershipcounsel.org>; silvia@alianzacv.org

Subject: Public Comment Submission: May 19th Board of Supervisors Regular Meeting

Good evening Riverside County Board of Supervisors,

We hope this email finds you well. In partnership with Alianza Coachella Valley we are submitting the following letter in response to agenda items 3.3, 3.20, 3.21, and 3.38. Thank you for your consideration and we look forward to hearing a response from you during tomorrow's Board Meeting.

If you have any questions, comments, or concerns, please do not hesitate to contact us.

In community,

--

Nataly Escobedo Garcia, MA | *Policy Coordinator - Water Programs*

Leadership Counsel for Justice and Accountability

C: 805-407-9800 | E: ngarcia@leadershipcounsel.org



[Website](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

From: COB

Sent: Tuesday, May 19, 2020 8:36 AM

To: Nataly Escobedo Garcia <ngarcia@leadershipcounsel.org>

Cc: Walsh, Michael <MFWalsh@RIVCO.ORG>; Rodriguez, Greg L <GRodrigu@rivco.org>; Lesly Figueroa <lfigueroa@leadershipcounsel.org>; Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>; Phoebe Seaton <pseaton@leadershipcounsel.org>; Veronica Garibay <vgaribay@leadershipcounsel.org>; silvia@alianzacv.org

Bcc: Perez, Juan <JCPEREZ@RIVCO.ORG>; Saruwatari, Kimberly A. <KSaruwatari@rivco.org>; Federico, Brooke <bcfederico@RIVCO.ORG>

Subject: Public Comment Submission: May 19th 3.3, 3.20, 3.21 and 3.38 Board of Supervisors Regular Meeting (Leadership Counsel for justice and Accountability)

Greetings:

The Clerk of the Board of Supervisors is in receipt of your email and attached letter regarding several COVID-19-related funding items, and has included them in the record for May 19, 2020.

Thank you kindly, and please be and stay well,

Sue Maxwell

Board Assistant

Clerk of the Board of Supervisors

4080 Lemon Street, 1st Floor, Room 127

Riverside, CA 92501

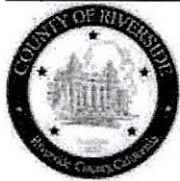
(951) 955-1069 Fax (951) 955-1071

Mail Stop #1010

cob@rivco.org

website: <http://rivcocob.org/>

<https://www.facebook.com/RivCoCOB/>



TOGETHER, Everybody Counts!



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Maxwell, Sue

From: COB
Sent: Tuesday, May 19, 2020 11:19 AM
To: Nataly Escobedo Garcia; COB
Cc: Walsh, Michael; Rodriguez, Greg L; Lesly Figueroa; Rebecca Zaragoza; Phoebe Seaton; Veronica Garibay; silvia@alianzacv.org
Subject: RE: Public Comment Submission: May 19th 3.3, 3.20, 3.21 and 3.38 Board of Supervisors Regular Meeting (Leadership Counsel for justice and Accountability)

Please stay on hold to retain your place in the phone queue. IT will get to you, as everyone is being connected in the order received for each Agenda Item or Public Comment.

It may have been best to acknowledge that you were on the line when they called your name (and corrected them on the Item number at that time).

I wish you best...and you may have already spoken.

Thank you,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
cob@rivco.org
website: <http://rivcocob.org/>
<https://www.facebook.com/RivCoCOB/>



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From: Nataly Escobedo Garcia <ngarcia@leadershipcounsel.org>
Sent: Tuesday, May 19, 2020 10:15 AM
To: COB <COB@RIVCO.ORG>
Cc: Walsh, Michael <MFWalsh@rivco.org>; Rodriguez, Greg L <GRodrigu@rivco.org>; Lesly Figueroa <lfigueroa@leadershipcounsel.org>; Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>; Phoebe Seaton <pseaton@leadershipcounsel.org>; Veronica Garibay <vgaribay@leadershipcounsel.org>; silvia@alianzacv.org

Subject: Re: Public Comment Submission: May 19th 3.3, 3.20, 3.21 and 3.38 Board of Supervisors Regular Meeting (Leadership Counsel for justice and Accountability)

Good morning,

I am currently on the phone waiting to give my comment. My name was called for item 3.2, even though I submitted the online form for item 3.20. I will remain on the line until this item is called and ask to be allowed to give public comment then.

Best,
Nataly

On Tue, May 19, 2020 at 8:36 AM COB <COB@rivco.org> wrote:

Greetings:

The Clerk of the Board of Supervisors is in receipt of your email and attached letter regarding several COVID-19-related funding items, and has included them in the record for May 19, 2020.

Thank you kindly, and please be and stay well,

Sue Maxwell

Board Assistant

Clerk of the Board of Supervisors

4080 Lemon Street, 1st Floor, Room 127

Riverside, CA 92501

(951) 955-1069 Fax (951) 955-1071

Mail Stop #1010

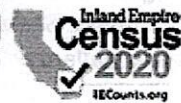
cob@rivco.org

website: <http://rivcocob.org/>

<https://www.facebook.com/RivCoCOB/>



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From: COB

Sent: Tuesday, May 19, 2020 11:24 AM

To: Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>

Subject: RE: Public Comment Submission: May 19th 3.3, 3.20, 3.21 and 3.38 Board of Supervisors Regular Meeting (Leadership Counsel for justice and Accountability)

I hope if you have not already spoken, you will remain on the line and be queue to speak.

Sincerely,

Sue Maxwell

Board Assistant

Clerk of the Board of Supervisors

4080 Lemon Street, 1st Floor, Room 127

Riverside, CA 92501

(951) 955-1069 Fax (951) 955-1071

Mail Stop #1010

cob@rivco.org

website: <http://rivcocob.org/>

<https://www.facebook.com/RivCoCOB/>



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From: Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>

Sent: Tuesday, May 19, 2020 10:18 AM

To: Nataly Escobedo Garcia <ngarcia@leadershipcounsel.org>

Cc: COB <COB@RIVCO.ORG>; Lesly Figueroa <lfigueroa@leadershipcounsel.org>; Phoebe Seaton <pseaton@leadershipcounsel.org>; Rodriguez, Greg L <GRodrigu@rivco.org>; Veronica Garibay <vgaribay@leadershipcounsel.org>; Walsh, Michael <MFWalsh@rivco.org>; silvia@alianzacv.org

Subject: Re: Public Comment Submission: May 19th 3.3, 3.20, 3.21 and 3.38 Board of Supervisors Regular Meeting (Leadership Counsel for justice and Accountability)

Good morning,

I am also currently on the phone. I signed up for item 3.3. My name is Rebecca Zaragoza and my number is +17607743528. Thank you.

On Tue, May 19, 2020 at 10:14 Nataly Escobedo Garcia <ngarcia@leadershipcounsel.org> wrote:

Good morning,

I am currently on the phone waiting to give my comment. My name was called for item 3.2, even though I submitted the online form for item 3.20. I will remain on the line until this item is called and ask to be allowed to give public comment then.

Best,
Nataly



May 18, 2020

Honorable V. Manuel Pérez
Chairman
Riverside County Board of Supervisors
4080 Lemon Street,
Riverside, CA. 92501

Submitted Via Email

RE: Public Comments for the Riverside County Board of Supervisors Regular Meeting on May 19, 2020

Dear Riverside County Board of Supervisors,

We hope this letter finds you well and in good health. On behalf of Leadership Counsel for Justice and Accountability we would like to submit the following public comments and recommendations concerning agenda items 3.3, 3.20, 3.21, and 3.38.

Agenda Item 3.3: Acceptance of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) Funding, Budget Establishment, and Administration

We are grateful that Riverside County will be able to benefit from funding allocated by the CARES Act. If implemented and used effectively, this funding allocation could significantly improve our local and regional response efforts to COVID-19 in Riverside County. It is unclear, however, how the recommended expenditure plan was developed and whether public comments and general public participation was included in this process. In an effort to elevate transparency and prioritize the needs of the most heavily impacted and vulnerable communities, we recommend that the Board of Supervisors postpone the vote on the recommended motions for Item 3.3 until the County conducts a meaningful and transparent community engagement process that helps create a stronger expenditure plan that accurately captures and reflects the other critical needs and asks that community residents in the Eastern Coachella Valley (ECV) and across Riverside County have been elevating.

On March 20th, April 3rd, and May 5, 2020, we submitted written comments that called on the Board of Supervisors to take swift action in responding to the COVID-19 impacts that are being

felt across the County. More specifically, we have advocated that greater support be given to the most vulnerable communities in the County, including the ECV. In this section, we reiterate several of those comments and outline recommendations on how to do this, as well as community feedback and priorities that we have provided to the Board of Supervisors in previous meetings and letters.

Gaps in the Implementation of CARES Act Funding Sections 1, 2, and 4

1. Business Assistance Response

Under the section titled “Implementation of CARES Act Funding”, staff recommends that \$50 million be allocated to provide “small business grants to assist businesses affected by interruptions due to the pandemic”. In addition, a letter submitted to the Board from the Riverside County Economic Recovery Task Force to the Board on May 15, 2020 (Attachment C of item 3.3) outlines the different priorities developed by the Task Force for the safe reopening of businesses across the County, including an ask for “investment in the range of \$35 to \$50 million dollars” to fund their 5 goals and recommendations. While we acknowledge the heavy economic impacts that residents and businesses are facing during this time, and appreciate the Task Force’s work to alleviate part of the hardship for the region, we urge a balanced approach that addresses the acute economic impacts to both businesses (including not-for-profit and community based organizations) and Riverside County residents.

We appreciate the Task Force for Recommendation 5 which calls for the creation of a “Resource Table” as it aligns with our continued request for the creation of a community-based and community-led economic recovery task force. Identifying and sharing useful resources with residents who are suffering economically is greatly needed, but they merit the same opportunity to provide feedback, guidance, and priorities to the Board as well as have them be equitably heard and considered.

Key Recommendations:

- Prioritize funding for programs and assistance for workers and residents struggling to stay in their homes and maintain basic necessities including water, electricity, food, and medicine. This type of investment will promote short and long-term economic stability across the County and ensure that we are prioritizing the economic security of its residents and increasing long-term capacity to participate in an economic recovery.

- Identify and target support to small businesses with owners who are black, indigenous, and/or people of color. Specifically, they should receive assistance to support safety measures and other infrastructure in order to reopen and operate safely.
- Establish a community-led economic recovery task force for Riverside County with sub regional task forces that help capture local issues and utilize this venue to solicit feedback on the expenditure plan and identify key priorities that require immediate and significant assistance (more detail below).

2. Riverside County Government Response and Preparation

We support the provision of PPE and other assistance to first-responders and government employees. Their collective work and sacrifice during this time has considerably helped in flattening the curve in Riverside County.

As additional assistance, however, it is vital to also provide these supportive measures to the greater population of Riverside County. This includes providing PPE to all essential workers like farmworkers, grocery workers, and landscape workers and requiring employers to ensure safe and healthy workplaces.

Additionally, the County must make resources available to provide financial support to residents who have been laid-off or had their hours reduced, as well as financial support to workers who have lost their job after contracting COVID-19. Countless workers have been locked out of the full suite of safety net services made available through federal resources. Additional financial support to local food banks, schools, and churches providing meal service and safe drinking water to residents, as well as for direct delivery to more vulnerable residents like senior citizens or immunocompromised residents that make the request is critical to protecting the health and safety of the County's most vulnerable. Funding for rural communities who have limited access to broadband and internet and are heavily impacted by the digital divide.

Key Recommendations:

- Prioritize, enhance, and enforce protective measures for all essential workers, including farmworkers, grocery workers, and landscape workers by providing PPE and enforcing the provision of PPE by employers.
- Allocate funding to support food banks, schools, and churches who are providing food and drinking water to residents and who are also working to directly deliver food to those most vulnerable to COVID-19.
- Implement and extend broadband infrastructure to support residents in rural areas to have stronger access to the internet.

3. Homelessness/Rental Assistance/Sheltering/Workforce Development

We support the allocation to assist community residents in rental assistance and other housing opportunities to support tenants who have been struggling to pay rent due to COVID-19, however, we propose there is a priority to support the most vulnerable throughout the county. Ensuring coordinated homelessness prevention strategies are put in place for currently housed individuals is critical in communities who are more vulnerable to intimidation and evictions.

For instance, Oasis mobile home park is in eastern Riverside County near the west shore of the Salton Sea. The park is home to approximately 1,900 people living in more than 200 units. Residents in the mobile home park struggle with contaminated drinking water, substandard housing, severe habitability issues, including frequent water shutoffs, unsafe wastewater infrastructure, increased rent, fees that either exceed the cost of service (e.g. electricity) or for services that are not provided (e.g. trash service), hostile management, threats of retaliation, homeless dogs, flooding due to inadequate stormwater infrastructure, and an illegal waste dump that periodically accumulates at the southside of the park.

It is our understanding that the park is at least partially located on allotted land and because of this, tribal, local and state jurisdiction is limited. However, replacement housing within county jurisdiction is a viable solution, especially for a community that has been severely impacted by COVID-19 and does not benefit from any state or local protections, this is an urgent matter in need of a solution. Residents in this mobile home park continue to face the impact of COVID-19 in job loss, school closures, increased food insecurity, and more. Oasis MHP is one example of the multitude of impacts residents in rural communities are facing and must be addressed to lessen the economic impact on families. We propose the recommended \$50 million for housing efforts to undergo a public process and prioritize the needs of most vulnerable communities.

Key Recommendations:

- Prioritize and increase rental assistance allocation to most vulnerable communities.
- Include utility assistance as a component of rental assistance.
- Develop a short-term COVID-19 response strategy for Oasis MHP that includes a long-term housing replacement plan.
- Create a public process and stakeholder group to inform the allocation and expenditure of funding for housing, rental assistance, sheltering, and workforce development.
- Fund legal assistance to protect tenants and others vulnerable of losing their homes, including support for both documented and undocumented residents.

In addition to the key recommendations above, we also ask that the following be included and funded under eligible expenditures:

- Transportation assistance for residents needing to access testing sites or other medical facilities in addition to food banks and food dispensaries.
- Ensure that the “mobile outreach to our vulnerable populations” includes rural communities and for material, announcements, and other communication methods are spread through accessible formats and languages, including Spanish and Purhépecha.
- Unemployment and other direct cash assistance for residents who are undocumented and residents who do not qualify for any federal or state relief funds due to their immigration status.
- Riverside County should provide strong oversight, monitoring, and reporting of all expenditures. We appreciate the recommendation for reports to be presented to the Board each month, but also ask for greater transparency and better engagement efforts to gather input into the decision-making process behind these expenses.

Guidance for Implementing a Community- led Economic Recovery Task Force

As mentioned above, it’s important for Riverside County to be transparent and equitable in its efforts to lead the economic recovery. We recommend the Board to create a county-wide economic recovery task force that will advise, guide, and direct the Board on how to utilize its CARES Act and other emergency relief funds intended to alleviate the impacts of COVID-19 in the community.

Key Recommendations:

- Establish a community-led economic recovery task force for Riverside County.
- Create sub regional task forces that help capture local issues. One sub regional task force shall be established in the Coachella Valley that includes the communities of Thermal, Oasis, Mecca, North Shore, and the City of Coachella.
- Utilize this venue to solicit feedback on the expenditure plan and identify key priorities that require immediate and significant assistance.
- Ensure that the task forces include residents, tenants, non-profit organizations, community-based organizations, youth, small-business owners, and people of color, and other participants that reflect the community for which the task force represents.
- The subregional task forces shall meet on a regular basis to develop a plan that identifies priorities and funding allocations for their local needs.

- The subregional task forces shall reconvene to merge all plans and identify a path forward for amending and establishing a regional and County-wide expenditure plan for the CARES Act funding.

Overall, we appreciate the progress that Riverside County has made in responding to the public health and economic crises related to COVID-19, but there is still much to be done to support residents and the community. Our recommendation is for the Board to postpone the vote on item 3.3. In order to bring this item back to the Board, we ask that the County consider our requests, conduct meaningful outreach and engagement to solicit public input, and update the expenditure plan for the CARES Act funding allocation that better reflect community priorities.

Agenda Item 3.20: HOUSING, HOMELESSNESS PREVENTION AND WORKFORCE SOLUTIONS: Approval and Adoption of the 2020-2021 One Year Action Plan of the County's 2019-2024 Consolidated Plan for HUD Community Planning and Development (CPD) Funding, Acceptance of CPD Funding Allocation, and Related Actions

As the plan is currently written, we have concerns regarding the prioritization of projects and policies and the communities that would benefit from this support. We believe changes need to be made to the plan before it can be adopted and ask that the board consider the following recommendations before approving the Consolidation Plan.

Citizen Participation Process and consultation process

HHPWS needs to implement a robust and inclusive public participation plan. Neither the One Year Action Plan nor the Citizen Participation Plan includes a robust plan for public engagement. Furthermore, the plan does not include any discussion of public engagement in the context of the COVID-19 pandemic. To ensure the public is adequately engaged throughout the implementation of the Consolidation Plan, we make the following recommendations:

- Ensure that materials are translated into all languages spoken by at least 5 percent of the public served by the agency, who do not speak English or are unable to effectively communicate in English.
- Provide interpretation at all public meetings into all languages spoken by at least 5 percent of the public served by the agency, who do not speak English or are unable to effectively communicate in English.
- Ensure all public meetings are held at accessible times and locations for disadvantaged community residents.
- Demonstrate how the County has incorporated / incorporates public input into the Plan and Plan implementation

Annual Goals and Objectives

HHPWS must prioritize low-income residents' housing programs. While all goals and objectives will be critical to stabilizing housing needs in Riverside County, HHPWS must prioritize goals and objectives that support the most impacted residents in the county. To ensure residents that are most impacted by housing issues, we make the following recommendations:

- Expand the affordable rental housing stock, improve the Conditions of substandard housing, and address farmworkers housing needs, as the first priority of the Consolidation Plan
- Goals and objectives should prioritize the needs of historically marginalized communities, such as neighborhoods in Eastern Coachella Valley

Projects

HHPWS needs to explain their selection process for project benefits recipients and ensure transparency through the selection process. Several of the projects that will be implemented will benefit very few households due to the limited funding available. As such HHPWS must explain their selection process to ensure that project benefits are distributed to residents most in need. To ensure equity and transparency through the selection process, we make the following recommendations:

- Include detailed description of the project benefits selection process.
- Clarify prioritization for residents most in need in the description of the selection process
- Prioritize recipients of project benefits from historically marginalized communities, such as the Eastern Coachella Valley.
 - Almost 200 families are currently facing severe housing insecurity and living in substandard conditions at Oasis Mobile Home Park. Oasis MHP families and others in similar circumstances should benefit from these investments.

Please accept the following recommendations below on a few of the allocations totalling for the FY 2020-2021 of \$8,059,621 in CDBG funds, \$2,531,648 in HOME Program funds, and \$641,710 in ESG funds. It is critical these allocations truly benefit low-income individuals, especially in the duration of the pandemic where tenants are more vulnerable and rent-burdened than before.

HOME CHDO Set-Aside \$379,348

The set-aside for the Community Housing and Development Organizations estimates that 5 households will benefit from this allocation. We propose there be a priority for farmworker and low-income housing.

HOME New Construction \$1,299,368

The goal of this allocation is to expand the affordable rental housing stock to an estimated 40 households that will directly benefit from this allocation. We propose there be a priority for farmworker and low-income housing.

ESG20 - County of Riverside \$641,710

The goal of the ESG allocation is to support homelessness prevention strategies including emergency rental assistance to prevent homelessness. This allocation should include support for residents at risk of losing their home due to non-payment, especially during the pandemic, including and especially those on tribal land who have less access to eviction protections.

Fair Housing Program Administration \$135,000

The goal of the program is to provide “no cost” fair housing services to “eligible” clientele, however, the eligibility is unclear as well as the provider of the service. Many residents in the Eastern Coachella Valley are impacted by less traditional housing practices and are vulnerable to evictions and substandard housing. This service should be available to all residents including those who are undocumented and people living on tribal land.

Emergency Assistance Program - \$20,000

Riverside Community Housing Corp. will use the CDBG allocation to provide emergency and essential assistance to 10 eligible individuals. This allocation should prioritize rental assistance to low-income tenants and be more flexible to ensure more families can benefit.

Home Enhancement Program - \$400,000

The goal of this program is to use this allocation for rehabilitation purposes including mobile homes and will assist about 12 households in the unincorporated Riverside County. This allocation should prioritize mobile homes in the Eastern Coachella Valley, which is in unincorporated county. Prioritizing and investing in affordable housing stock in rural communities will benefit communities vulnerable to displaced and substandard housing most in

need of rehabilitation. This should also include a set-aside of funding to complete the permitting process of unpermitted mobile home parks in the Eastern Coachella Valley.

Home Enhancement Program - \$267,642

The goal of this program is to use this allocation for rehabilitation purposes including mobile homes and will assist about 9 households in the unincorporated Riverside County. This allocation should prioritize mobile homes in the Eastern Coachella Valley, which is in unincorporated county and be more flexible to ensure more families can benefit. Prioritizing and investing in affordable housing stock in rural communities will benefit communities vulnerable and substandard housing most in need of rehabilitation. This should also include a set-aside of funding to complete the permitting process of unpermitted mobile home parks in the Eastern Coachella Valley.

It is important these recommendations are taken into consideration and included in the descriptions in the project allocations. It is unclear what the purpose and goal of the Eastern Coachella Valley Empowerment Initiative, we recommend this be clarified and modified with the participation of the community. Lastly, during these times is critical all funds are used in a coordinated and strategic effort to ensure low-income communities who are most vulnerable to crisis are supported.

Agenda Item 3.21: HOUSING, HOMELESSNESS PREVENTION, AND WORKFORCE SOLUTIONS (HHPWS): Amendment to the Citizen Participation Plan of the 2019-2024 Five Year Consolidated Plan, Acceptance of Community Development Block Grant-CV Funding Allocation, and Approval of the Substantial Amendment to the 2019-2020 One Year Action Plan of the 2014-2019 Five Year Consolidated Plan to include the Ramsey Street Village, COVID19 Micro-Enterprise Financial Assistance Program, COVID19 Rental Assistance Program, and CDBG-CV Program Administration

We provide recommendations below on the amendment to the Citizen Participation Plan, allocation of the Community Development Block Grant-CV funding, and approval of the amendment to the 2019-2020 One-Year Action Plan and to the 2019-2024 Five-Year Consolidated Plan.

COVID-19 Micro-Enterprise Financial Assistance Program - \$500,000

The Amendment to the 2019-2020 One Year Action Plan (Amendment) includes the allocation of the COVID-19 Micro-Enterprise Financial Assistance Program will serve 30-35 micro-enterprises within “eligible areas” of the County. The description of the program does not

provide definitions for the “eligible or a micro-enterprise. Similarly, it doesn’t discuss how eligible entities will prove they have been financially impacted by COVID-19. It is unclear how the micro-enterprises will be chosen and how awarded funds will (or can) be spent.

Key Recommendations:

- Provide clarification on the County’s “eligible areas”, selection process, and how entities will demonstrate financial impact from COVID-19 and ensure all communities are eligible
- Prioritize small businesses in disadvantaged and low-income communities

COVID-19 Rental Assistance Program - \$3,340,000

The recommended amendment includes COVID-19 Rental Assistance Program serving 2,200 households countywide. We are pleased to see the dedication of funds to help people stay in their homes during this crisis but request greater clarity as to the geographic distribution of the funds, selection criteria, and process for administering funds. It is critical resources are distributed to disadvantaged and low-income communities where the needs are much higher due to high unemployment and underemployment caused by COVID-19 and legacy of rent burdened households. The County should also dedicate resources from this and other funding sources to increase the amount of funds available to address this critical need. Finally, assistance to pay for - sometimes as much or more than base rental costs should be eligible under this program.

It is unclear in the description of the program how non-profits will apply to administer the program as sub-recipients. Additionally, it is unclear how the rental assistance will be received by the tenant or the landlord. This should be made clear within the program and guidance should be given to the sub-recipients who will distribute the rental assistance. Additionally, there should be clear guidance as to how landlords and tenants receive notification and confirmation that rent has been paid in addition to relevant anti-discrimination and anti-intimidation mandates. This is especially critical if rental assistance is distributed to the landlord or property owner rather than the tenant. Additionally the County and / or sub-recipient administering the program should ensure the tenant does not face discrimination, intimidation, or retaliation from the landlord or property owner as a result of their participation in the program.

Residents who live in tribal land and in unpermitted parks within the Eastern Coachella Valley, along with other informal housing situations are most vulnerable to intimidation, retaliation, and evictions. With more than 100 mobile home parks in the Eastern Coachella Valley, it is important the County provides guidance and prioritizes residents in vulnerable housing. Additionally, we request verification that all tenants are eligible for this program and recommend that undocumented tenants who have less access to emergency financial support are prioritized.

Rental assistance is critical to ensuring tenants can stay in their homes during and after the pandemic. As discussed in greater detail below, an eviction moratorium combined with rental assistance will help tenants stay in their homes, prevent increased homelessness and support regional economic sustainability. We recognize rental assistance is a stop-gap and we need to work together to develop an effective and equitable economy to ensure that tenants impacted by the current and impending impacts of COVID-19 are not perpetually at risk of losing their homes.

Key Recommendations:

- Prioritize low-income tenants, especially tenants who reside on tribal and allotted land in more vulnerable housing situations
- Clarify the process for nonprofits to become sub-recipients of the rental assistance fund and provide guidance to sub-recipients on prioritizing more vulnerable low-income tenants
- Clarify and provide guidance to ensure rent payments are received by the landlord or property owner to prevent any further landlord-tenant disputes for non-payment of rent from the County or the sub-recipient administering the rental assistance program
- Include in amendment to the 2019-2020 One Year Action Plan to implement utility assistance within the rental assistance program
- Ensure priority of rental assistance to undocumented residents and other vulnerable household in current and future funding allocations
- Expand available resources commensurate with the need for urgent rental assistance
- Fund legal assistance to protect tenants and others vulnerable of losing their homes, including support for both documented and undocumented residents.

CDBG-CV Reserve Fund/ Program Administration- \$901,211

The proposed amendment to includes CDBG - CV Reserve Fund/ Program Administration which would allocate \$368,211 to an unallocated reserve or contingency fund to provide more funding to the already listed eligible activities such as the COVID-19 Rental Assistance Program or the COVID-19 Micro-Enterprise Financial Assistance Program. However, it is unclear on how the decision as to how to allocate this funding will be made. We recommend that unallocated funding to go to the COVID-19 Rental Assistance Program.

The proposed amendment recommends an allocation of \$130,000 to the Fair Housing Council of Riverside County Inc..It is unclear what type of support and resources the Fair Housing Council of Riverside County Inc. has provided during the pandemic to date. For example, services and resources have not been shared with residents of the Eastern Coachella Valley. The description

of this program proposes outreach, information, an eviction/foreclosure hotline, and advocacy to tenants within Riverside County. The implementation of the listed services is unclear and does not provide an adequate description of the services that will directly benefit residents in Riverside County, especially more vulnerable residents in rural communities like the Eastern Coachella Valley. Additionally, the program does not estimate the amount of residents who will be able to benefit from this program. The program and services from the Fair Housing Council of Riverside County Inc. shall not exclude undocumented residents.

The description of the program states funds will be used to pay for costs of the overall management and administration of the program. Additionally it is unclear if the leftover funds from the total \$901,211 allocation (totalling \$403,000) will be allocated to this program, and if so, why that is a reasonable expenditure.

Key Recommendations:

- Prioritize the \$368,211 allocation for COVID-19 Rental Assistance Program
- Clarify and provide further guidance to ensure services by the Fair Housing Council of Riverside County are provided to the the most vulnerable low-income tenants including undocumented residents.
- Require further justification of the \$403,000 for overall management of program

Agenda Item 3.38: Supervisor V. Manuel Perez: report back regarding eviction moratorium during covid-19 pandemic and adoption of ordinance no. 958, an urgency ordinance of the county of riverside enacting a temporary prohibition on covid-19 pandemic related evictions in the unincorporated areas of the County of Riverside

We are grateful for the staff report back and recommendation to adopt ordinance no.958: an urgency ordinance to enact a temporary prohibition on COVID-19 related evictions due to non-payment. We thank Supervisory Perez and the Board of Supervisors for consideration of this measure and recommend the following additions and clarifications to strengthen its efficacy and protections.

Timeline

The proposed urgency ordinance is proposed through May 31, 2020, or as may be extended by Governor's Executive Order, for any residential tenant who can demonstrate proof of the failure to pay rent as a direct impact of the COVID-19 pandemic.

Key Recommendations:

- Similar to the Judicial Council Rule, the proposed urgency ordinance should remain in place until at least 90 days following the end of the state's or county's stay at home orders, whichever is later.

Geography

Although the ordinance applies in the unincorporated areas of Riverside County and includes residents living in mobile homes, gaps exist for residents who reside on tribal and allotted land within the Eastern Coachella Valley. For instance, tribal land of the Torres Martinez Desert Cahuilla Indians and allotted land of specific tribal members are exempt from any executive order or the proposed urgency ordinance. Many residents of the Eastern Coachella Valley live in substandard and dilapidated mobile home parks many within and around the checkerboard tribal land pattern where on one end of the street it is Riverside County jurisdiction and the other side is tribal land. This leads to confusion within neighbor's and family members who are under the understanding they are under the same policies. Additionally, within Riverside County in the Eastern Coachella Valley there are also unpermitted and informal mobile home parks called Polanco Parks where many are in the middle of the permitting process and many are not, which in the past has been an issue with tenant rights, drinking water consolidation, and fines..

Key Recommendations:

- Establish coordination with tribal entities and owners of allotted land to ensure Riverside County residents who live on tribal land can enjoy the protections of the proposed urgency ordinance
- Increase innovative communications methods to share updates on housing policies or resources to residents, especially the most linguistically and geographically isolated residents
- The proposed urgency ordinance should extend to unpermitted parks and those in the middle of the permitting process. However, further streamlining the permitting process will create more stability and opportunity for the mobile home parks.

Concerns related to applicability of three-day notices requirements of partial payment and proof requirements

The proposed ordinance allows up to seven days following the day rent is due for the tenant to communicate an inability to pay rent due to direct or indirect COVID-19 impacts but does not prohibit issuance of a “pay or quit” notice during that time. To avoid confusion and intimidation, the ordinance should be amended to prohibit issuance of “pay or quit” notices for at least seven days following the day rent is due and preferably for the duration of the emergency.

Additionally, the proposed urgency ordinance obligates the tenant to pay partial rent when there has been partial loss of income. This is problematic because if the tenant has lost total income or cannot prove loss of income or needs partial income to pay for other expenses from their limited earnings, this provision in the proposed urgency ordinance is limiting and does not fully protect tenants.

The proposed urgency ordinance states tenants must provide verifiable documentation showing financial impact related to COVID-19 within 30 days of the tenant’s written communication to the landlord to delay all or some payment of rent. This is an obstacle for low-income renters who may not be able to prove their loss of income if they are part of an informal economy or are undocumented.

Additionally, all back-rent to be paid by the tenant due 6-months after the expiration or termination should be the date furthest of the State of Emergency, Local Health Emergency, or Executive Order N-37-20, whereas anything earlier puts tenants at risk. If back-rent is due 6-months after the expiration or termination of state local emergency or executive order , is a foreseen challenge to tenants whereas may not be sufficient to pay back all rent that is due within 6 months and should be extended to further support tenants as the economy progresses.

Key Recommendations:

- To simplify procedures and ensure maximum protection for tenants during this uncertain time, amend the ordinance to state that issuance of a 3-day pay or quit notice is prohibited during the duration of the state of emergency and 90 days following the termination of the state of emergency. At the very least, amend the ordinance to prohibit issuance of three day notices until after 7 days have passed (during which time a tenant can notify a landlord that they are unable to pay due to COVID-19)
- Amend the ordinance to be similar to the provision that *“clarifies that “in writing” for purposes of notice to the landlord includes paper copy, email or text communications to the landlord or the owner’s representative with whom the tenant has previously corresponded by email or text.”* This method should also work for proof of loss of income for special circumstances such as if a tenant cannot prove their loss of income
- Amend the ordinance to eliminate the provision stating that partial rent must be paid and instead accept the tenant’s written notification of inability to pay all or some of the owed rent.

- Amend the ordinance to eliminate the provision that states “verifiable documentation” must be provided as proof of loss of income and eliminate the 30-day timeframe. The amended ordinance should read, “*within 30 days after the date that rent is due, notifies the landlord in writing of lost income and inability to pay full rent due to financial impacts related to COVID-19, whereas any documentation that is provided to support this claim is presumed to be adequate for this purpose, and the burden is on the landlord to prove that it is inadequate.*”
- Amend ordinance to extend the timeframe for back-rent to be paid back up to 12 months , dependent on the repayment plan between the tenant and the landlord that is deemed fair and reasonable by both parties.
- Amend ordinance to add that during the state of emergency landlords cannot raise rents or utilities
- Riverside County to work with advocacy organizations to secure funding to support rent forgiveness for low-income tenants
- Fund legal assistance to protect tenants and others vulnerable of losing their homes, including support for both documented and undocumented residents.

More comprehensive tenant protections combined with a myriad of critical safety net programs for residents including rental and cash assistance, will serve to provide stronger protections and resources to tenants during these times. With these changing policies and new resources, communication efforts must be increased to ensure both landlords and tenants receive the appropriate information and understand the protections tenants have under the proposed urgency ordinance.

It is critical Riverside County Housing Authority assigns the housing ombudsman to ensure tenants and landlords can work together to settle fair payment plans, clear up misunderstanding, and assist to reinforce tenant protections provided by the proposed urgency ordinance.

Leadership Counsel greatly believes in the importance of meaningful community engagement and public participation. We hope that the Board will be supportive in our efforts to elevate community priorities, increase transparency at the County level, and meet the needs of residents who are being impacted by COVID-19. We are ready to work alongside community residents, businesses, and the Board of Supervisors to make this happen. Thank you for your time and we look forward to hearing your response.

Sincerely,

Lesly Figueroa, Policy Advocate,
Leadership Council for Justice and
Accountability

Rebecca Zaragoza, Senior Policy Advocate,
Leadership Council for Justice and
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Nataly Escobedo García, Water Policy
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Silvia Paz, Executive Director, Alianza
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CC:
Riverside County Supervisor Vice-Chair Karen Spiegel
Riverside County Supervisor Jeff Hewitt
Riverside County Supervisor Kevin Jeffries
Riverside County Supervisor Chuck Washington
Riverside County Executive Officer George Johnson