



Charissa Leach, P.E.
Assistant TLMA Director

RIVERSIDE COUNTY

PLANNING DEPARTMENT

Memorandum

DATE: September 27, 2021

TO: Board of Supervisors

FROM: Robert Flores, Principal Planner

RE: Item 21 – No. 2. 15400 General Plan Amendment (GPA) NOS. 180002, 190006 and 210109

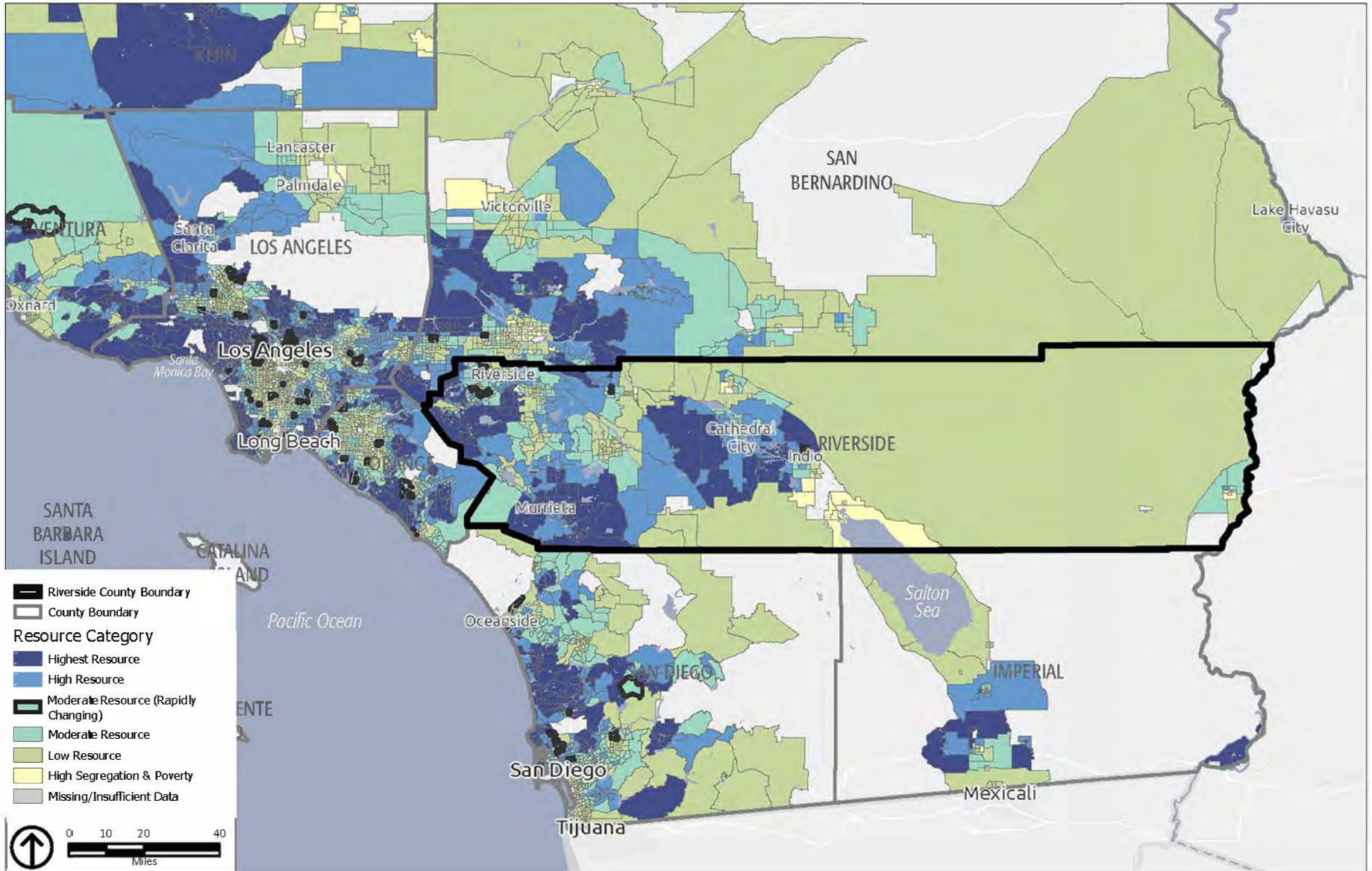
The purpose of this memo is to provide additional information and documents for the above referenced project.

1. Response to Comments: Provides a detailed response to four letters received from August 12, 2021 to September 20, 2021.

The Response to Comments identifies and provides clarification regarding the County's addressing the issues and concerns in the *updated* draft Housing Element.

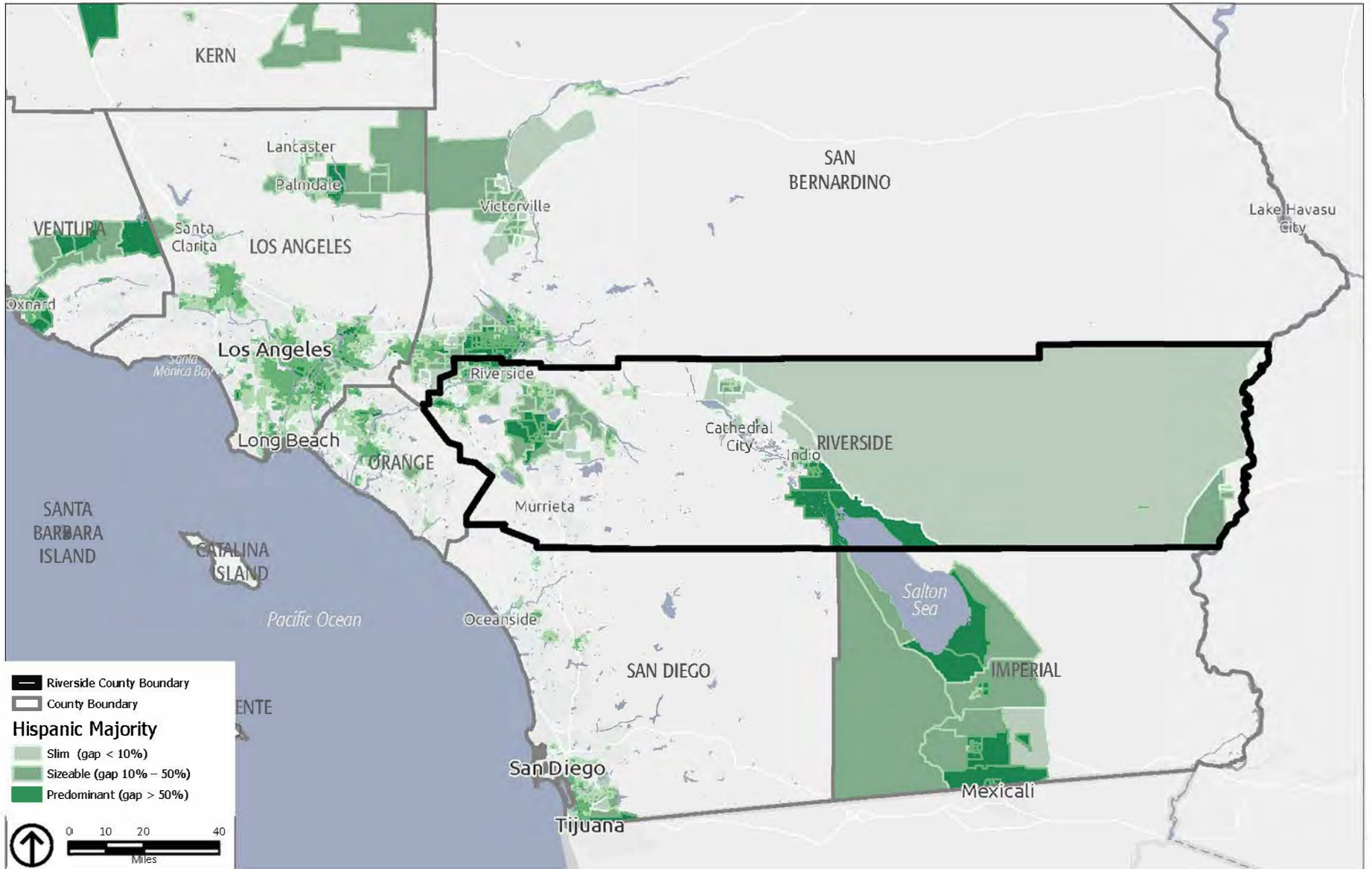
2. Copy of Maps for the draft Background Report (Appendix P-2). Maps were inadvertently left out of report posted September 23, 2021.

Appendix P-2 Housing Element Maps



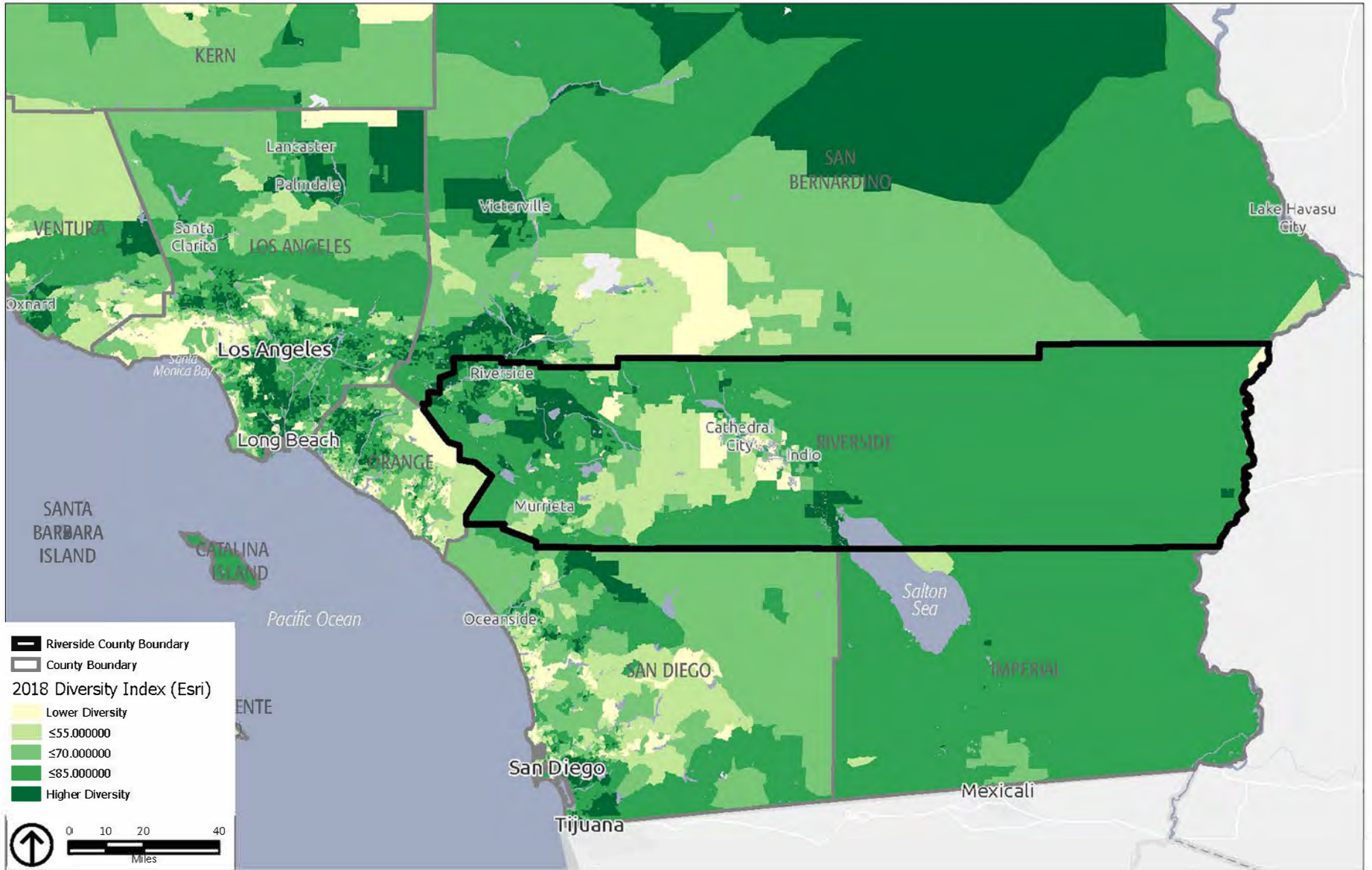
Source: TCAC/HCD (2021), by tract.

Figure P-1
 TCAC Opportunity Areas



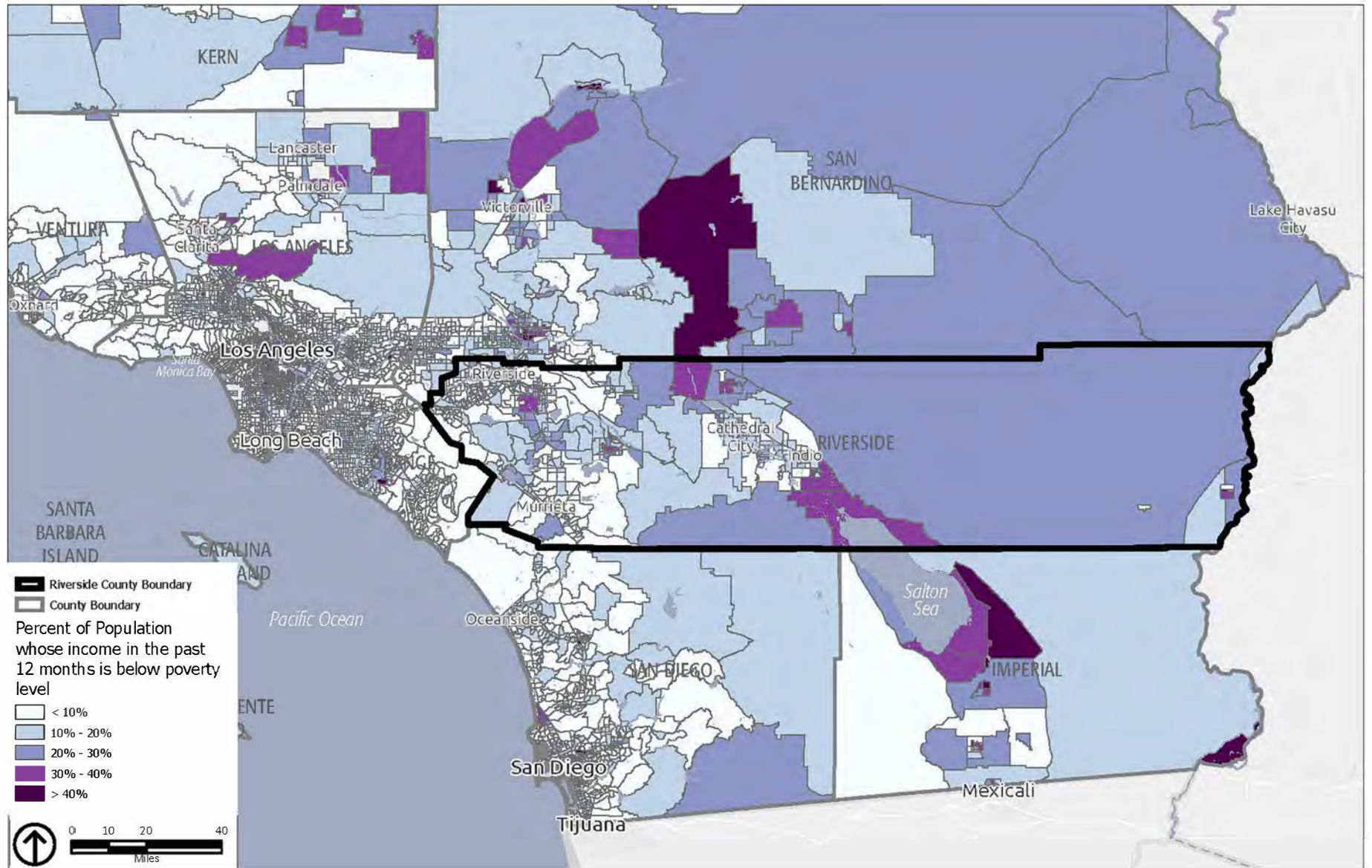
Source: US Census, 2010.

Figure P-2
 Predominant Population – Hispanic Majority



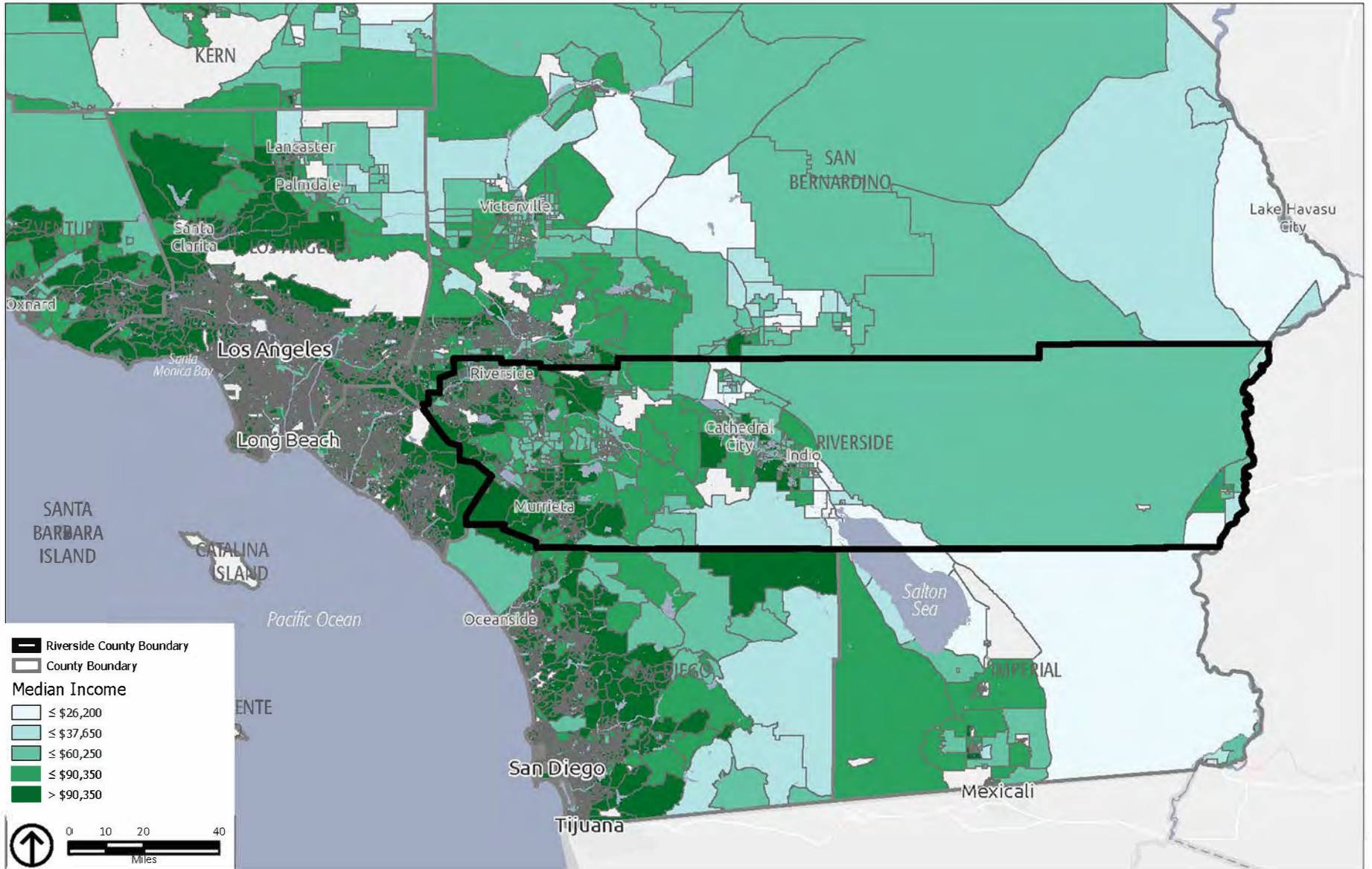
Source: Esri (2018), by block group.

Figure P-3
 Diversity Index



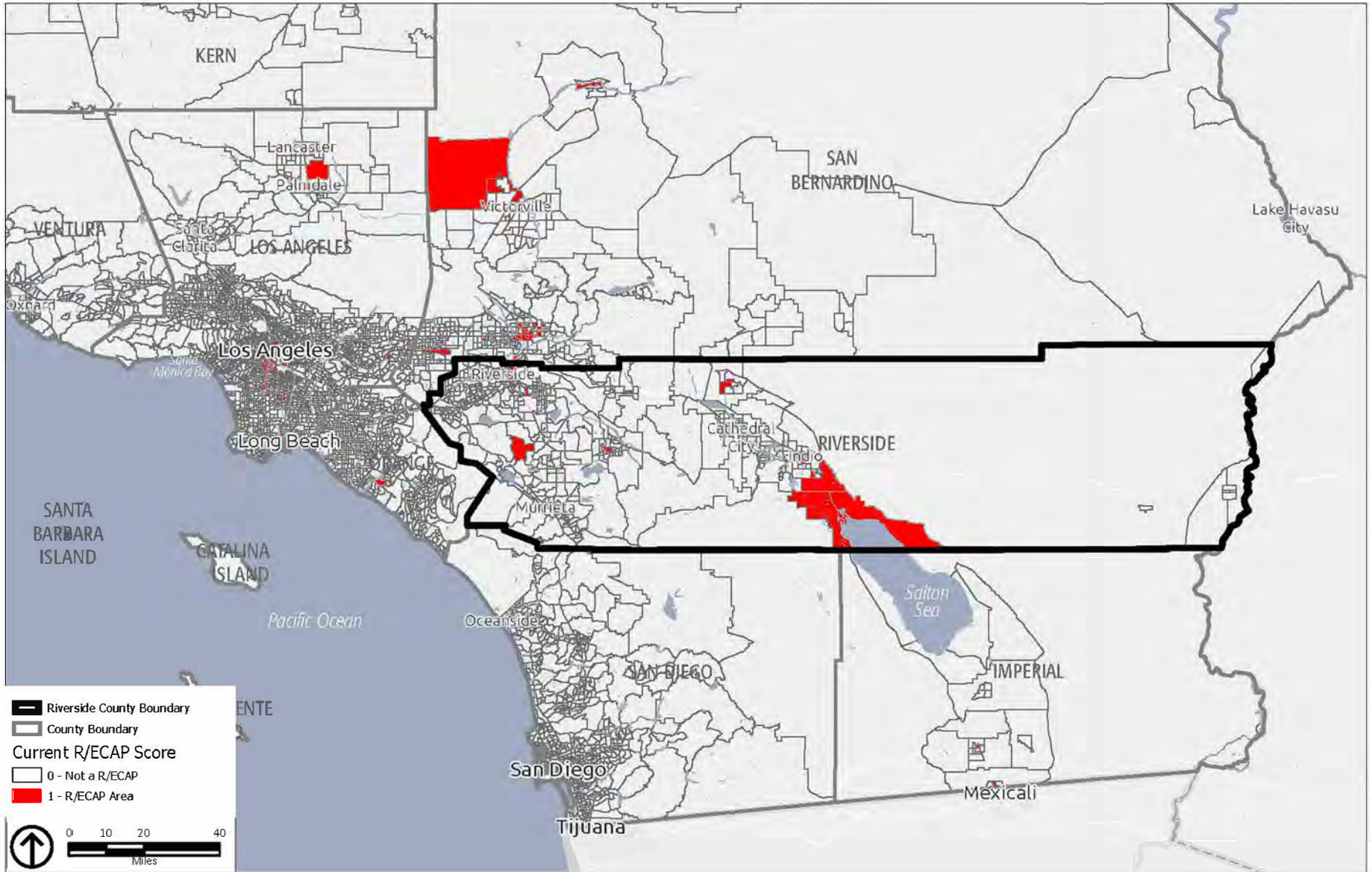
Source: ACS 5-year estimate (2015-2019), by tract.

Figure P-4
 Poverty Status



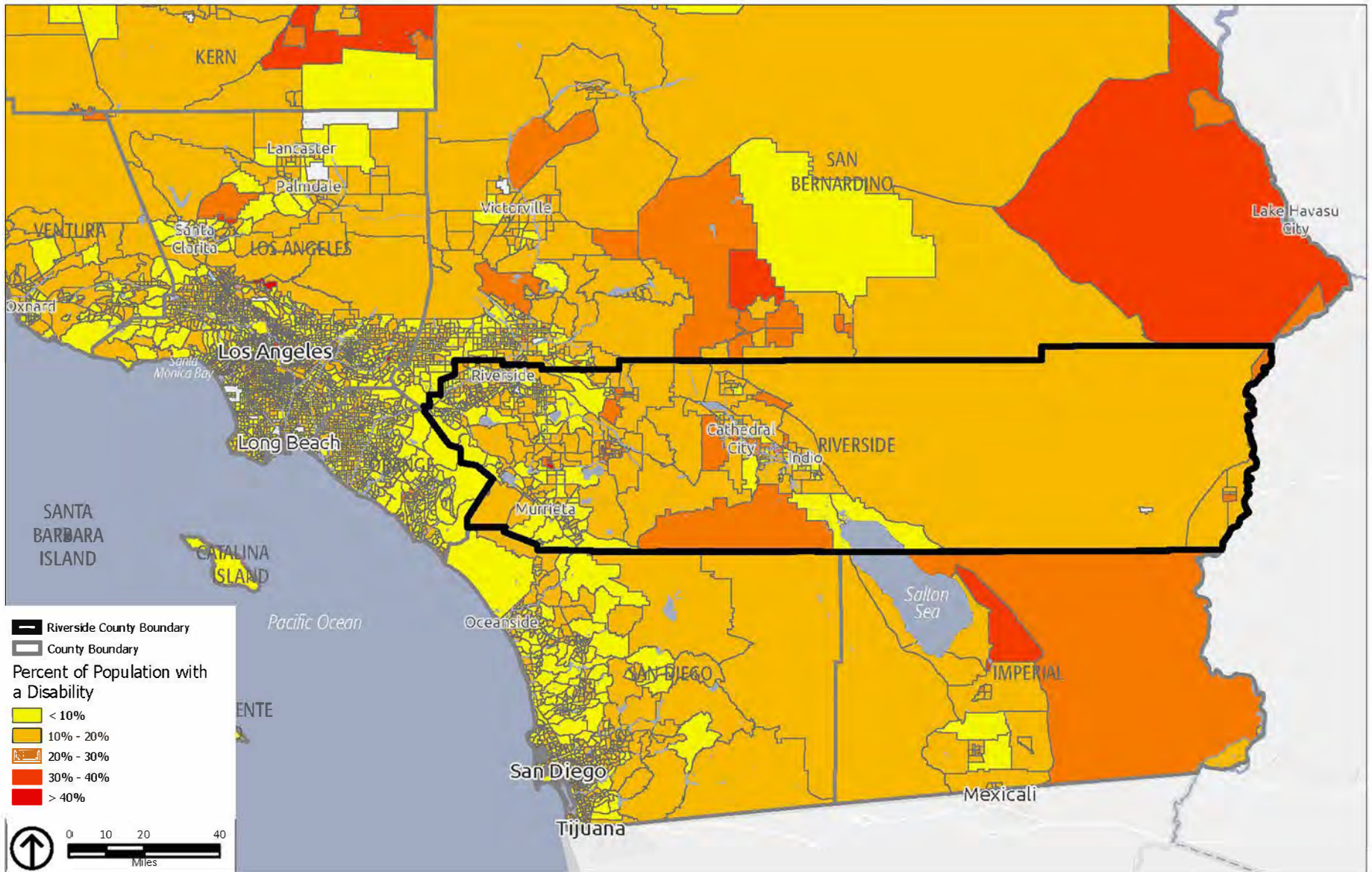
Source: ACS 5-year estimate (2015-2019), by block group.

Figure P-5
 Median Income



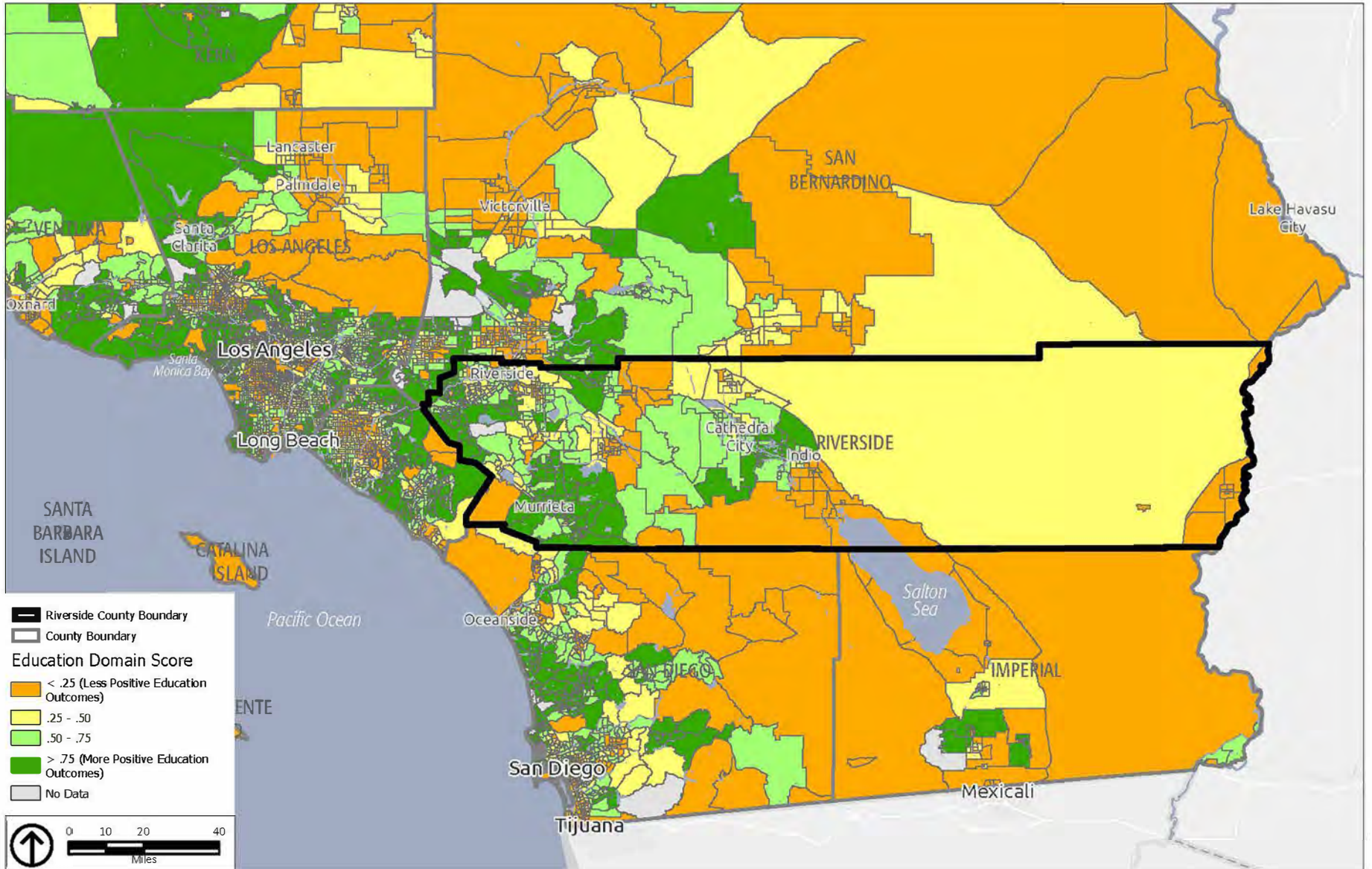
Source: HUD, 2009-2013.

Figure P-6
Racially or Ethnically Concentrated Areas of Poverty



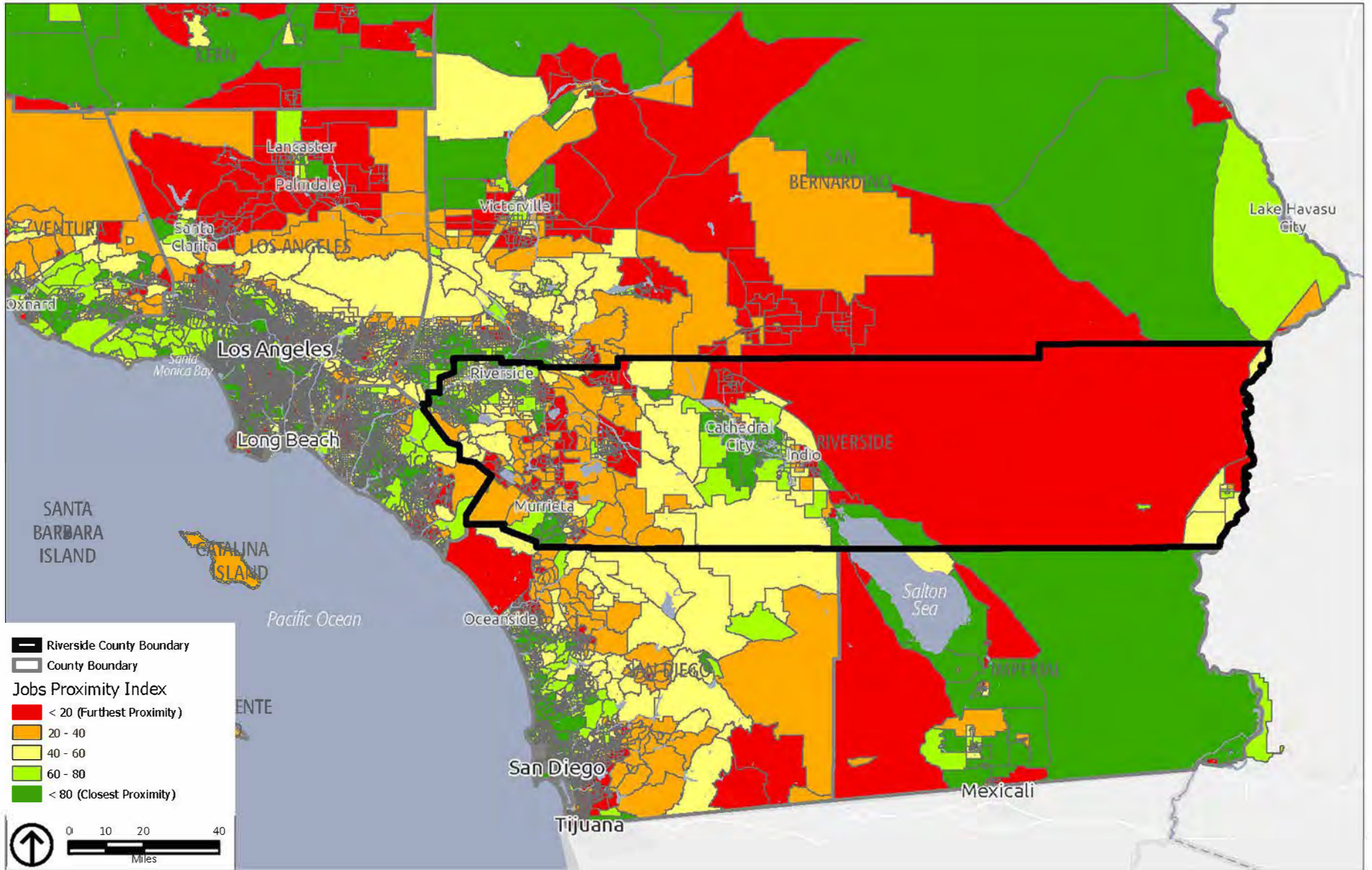
Source: ACS 5-year estimate (2015-2019), by tract.

Figure P-7
 Population with a Disability



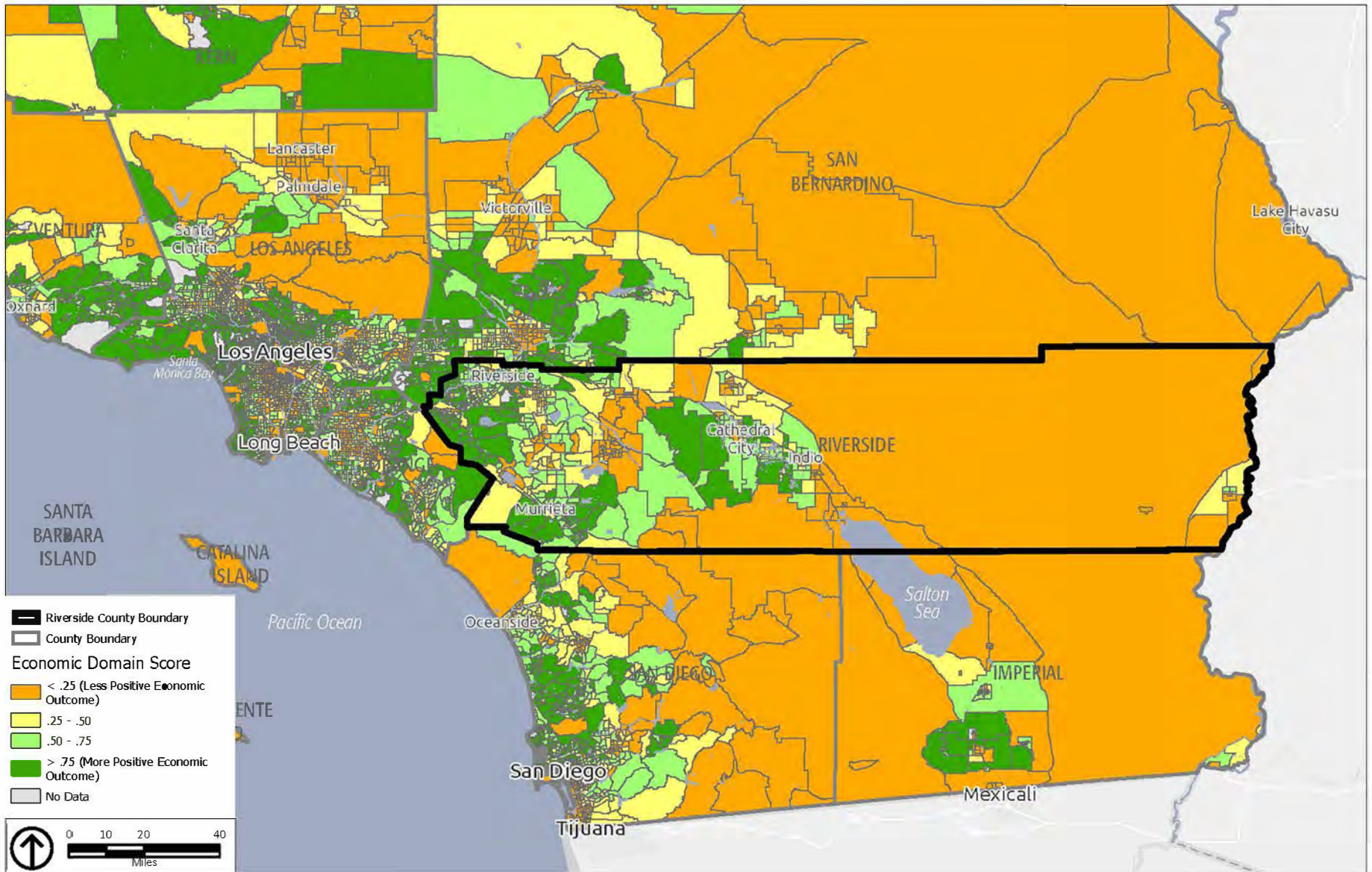
Source: TCAC/HCD (2021), by tract.

Figure P-8
 TCAC Education Score



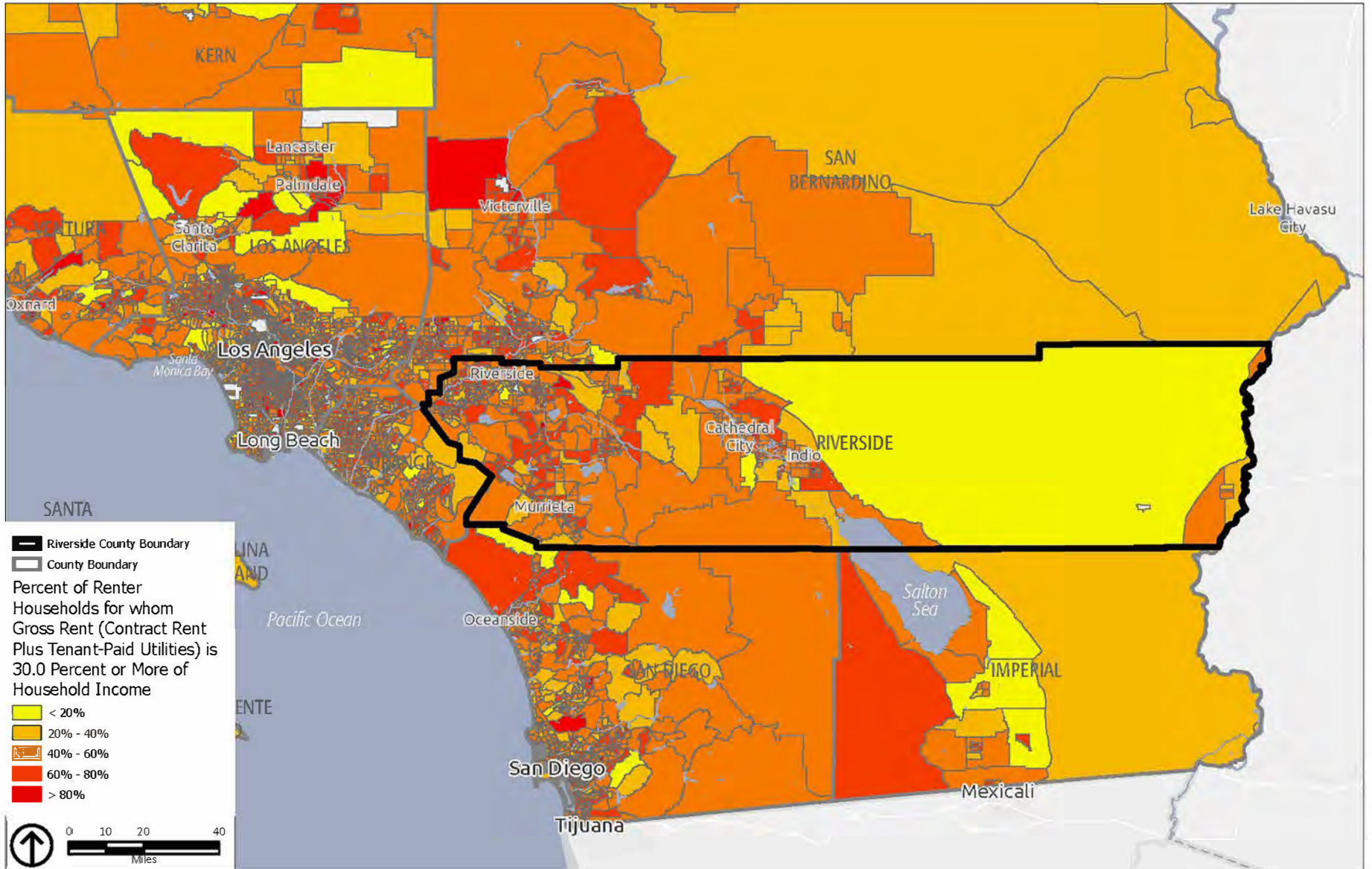
Source: HUD, 2014-2017.

Figure P-9
Jobs Proximity Index



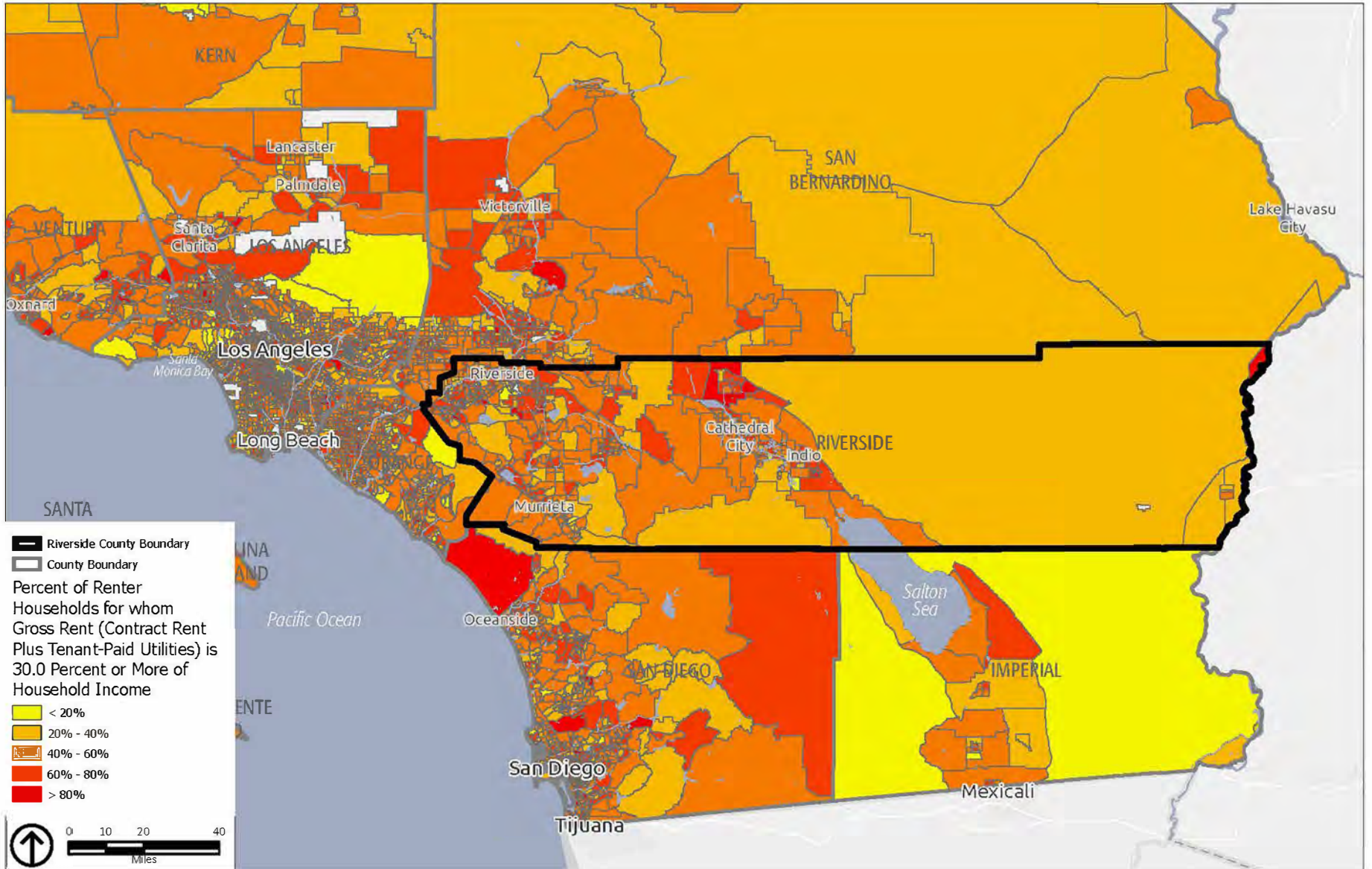
Source: TCAC/HCD (2021), by tract.

Figure P-10
 TCAC Economic Score



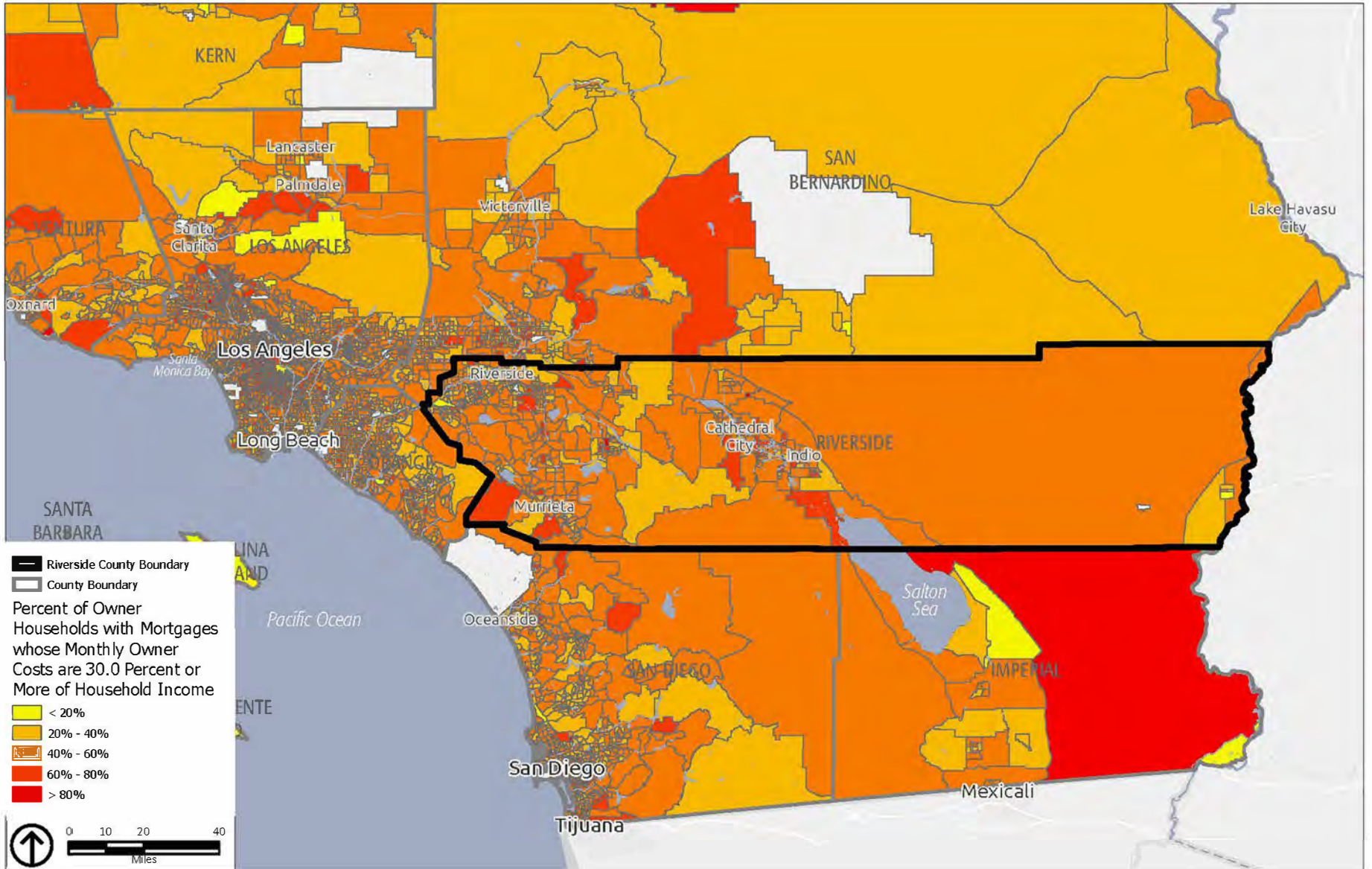
Source: ACS 5-year estimate (2010-2014), by tract.

Figure P-11
 Overpayment by Renters (2010-2014)



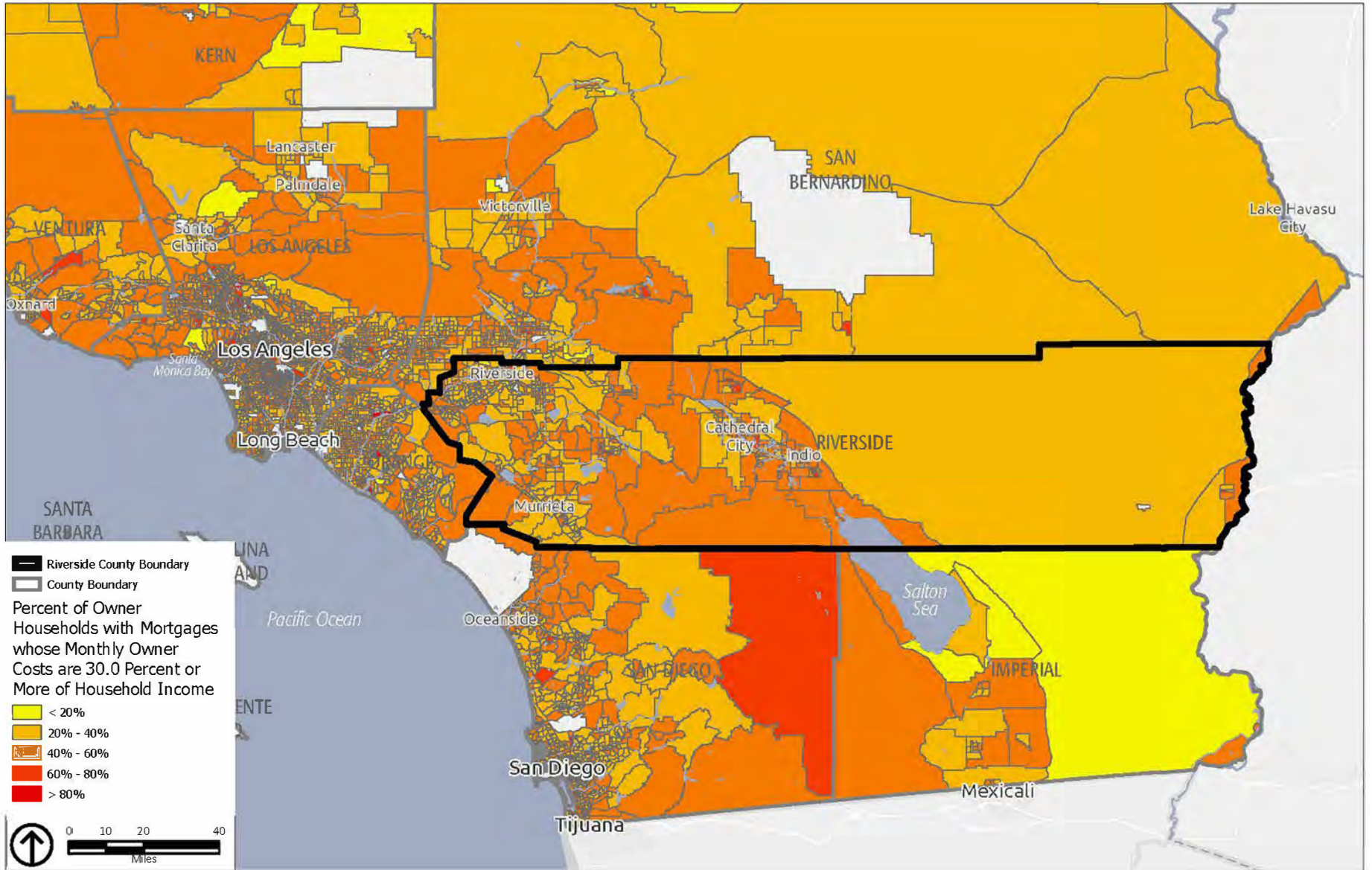
Source: ACS 5-year estimate (2015-2019), by tract.

Figure P-12
 Overpayment by Renters (2015-2019)



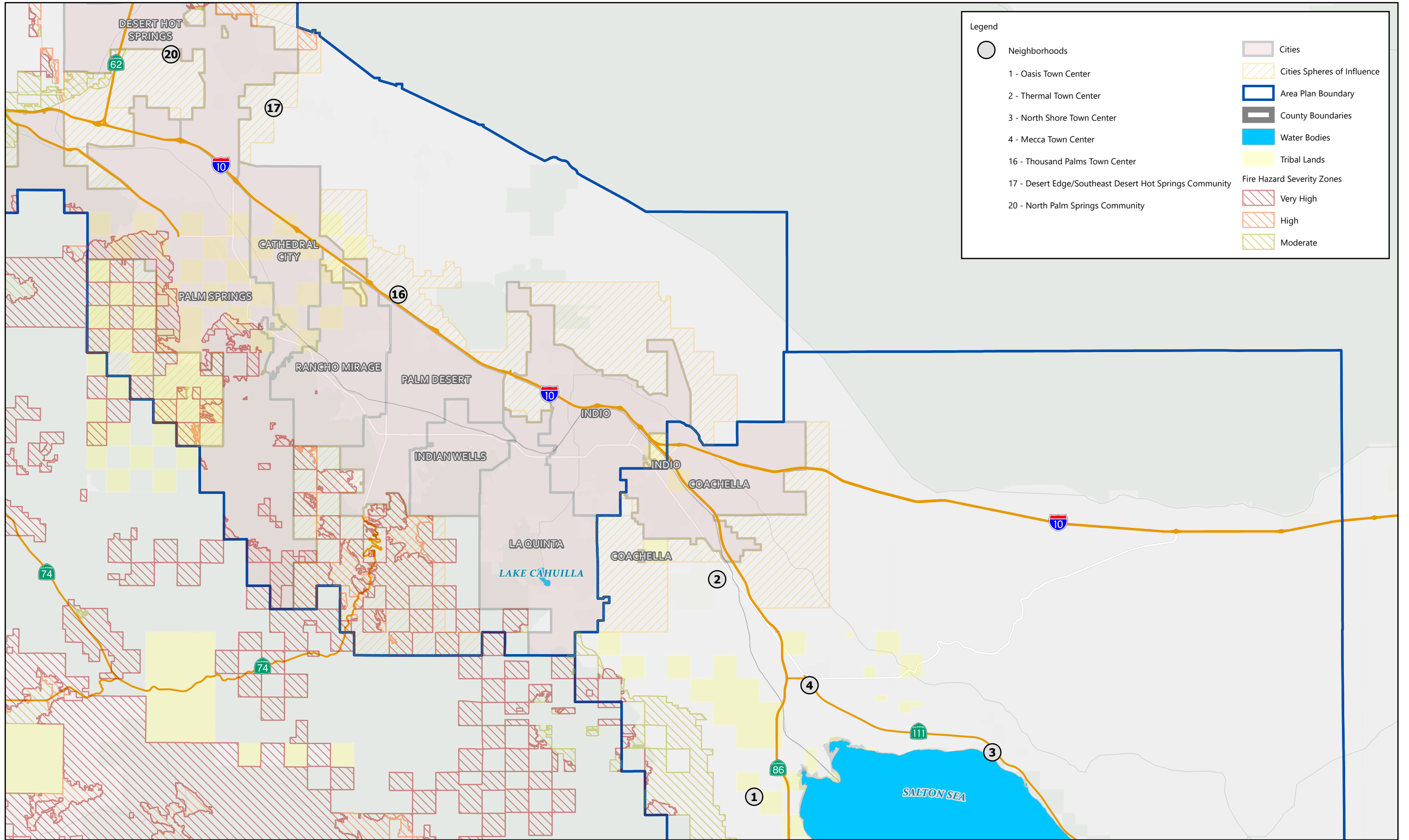
Source: ACS 5-year estimate (2010-2014), by tract.

Figure P-13
 Overpayment by Owners (2010-2014)

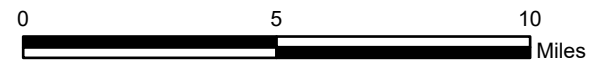


Source: ACS 5-year estimate (2015-2019), by tract.

Figure P-14
 Overpayment by Owners (2015-2019)

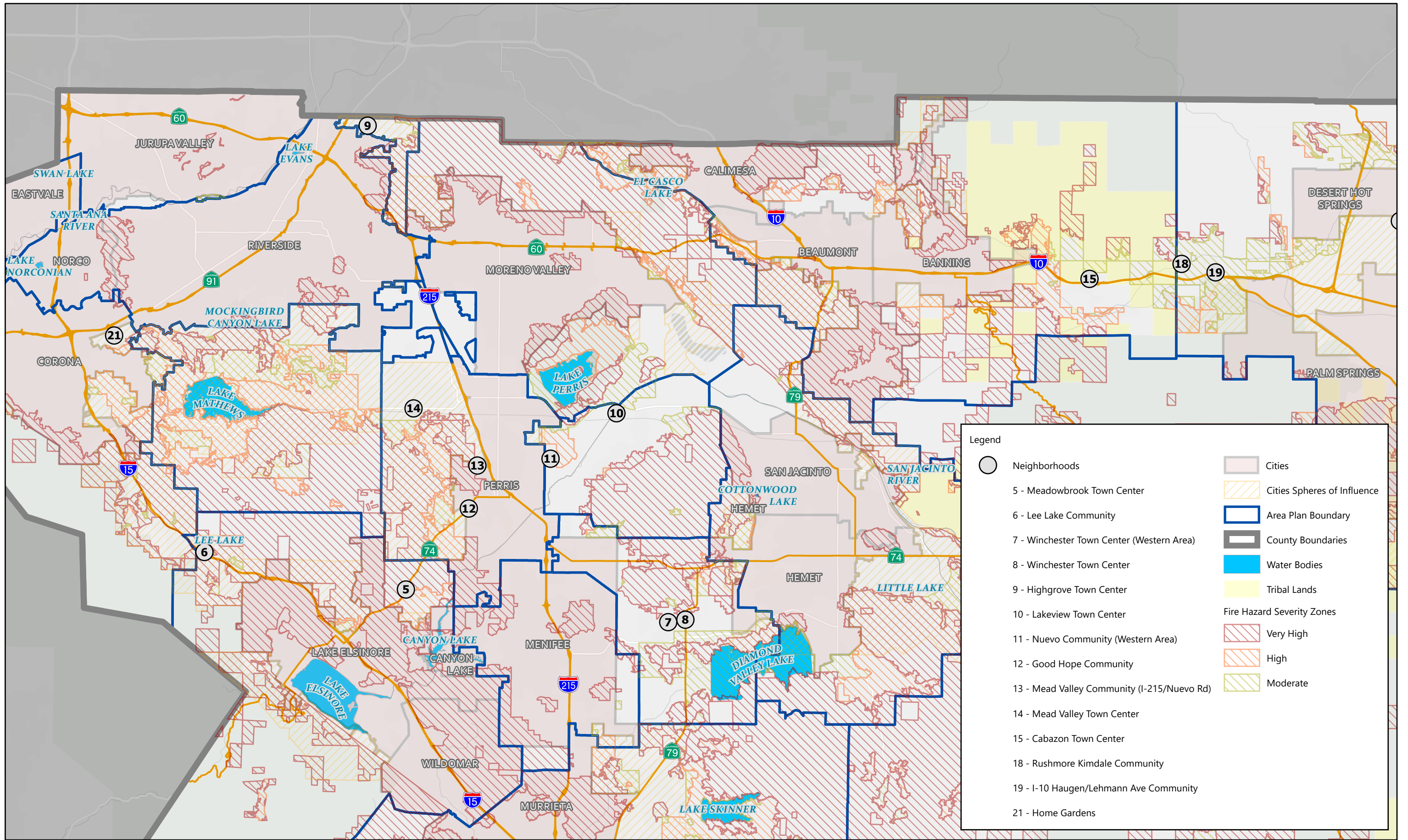


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Source: ESRI, Riverside County

Figure P-15: Neighborhood Overview (East)



Legend

- Neighborhoods
- 5 - Meadowbrook Town Center
- 6 - Lee Lake Community
- 7 - Winchester Town Center (Western Area)
- 8 - Winchester Town Center
- 9 - Highgrove Town Center
- 10 - Lakeview Town Center
- 11 - Nuevo Community (Western Area)
- 12 - Good Hope Community
- 13 - Mead Valley Community (I-215/Nuevo Rd)
- 14 - Mead Valley Town Center
- 15 - Cabazon Town Center
- 18 - Rushmore Kimdale Community
- 19 - I-10 Haugen/Lehmann Ave Community
- 21 - Home Gardens

- Cities
- ▨ Cities Spheres of Influence
- ▭ Area Plan Boundary
- ▭ County Boundaries
- Water Bodies
- Tribal Lands

Fire Hazard Severity Zones

- ▨ Very High
- ▨ High
- ▨ Moderate

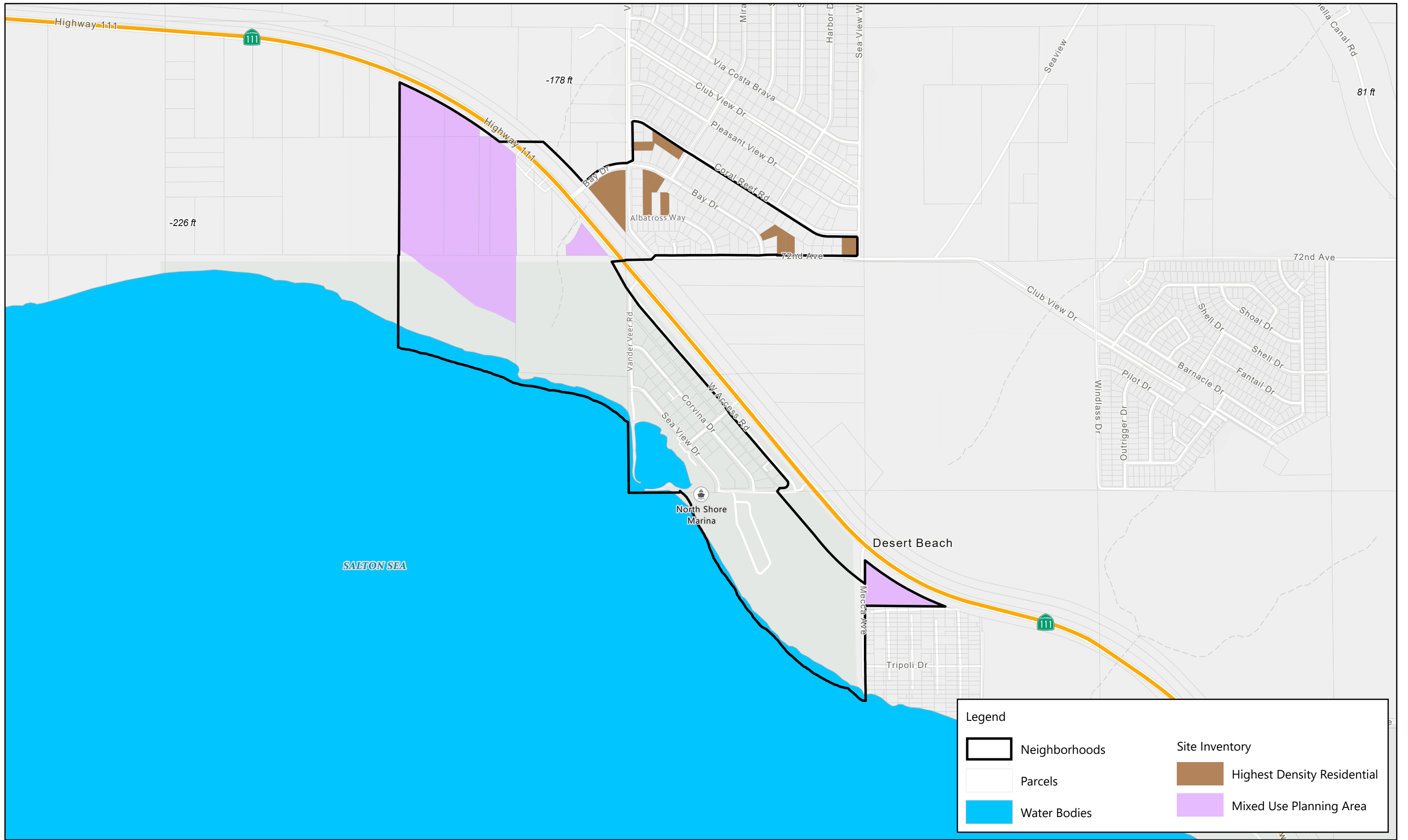


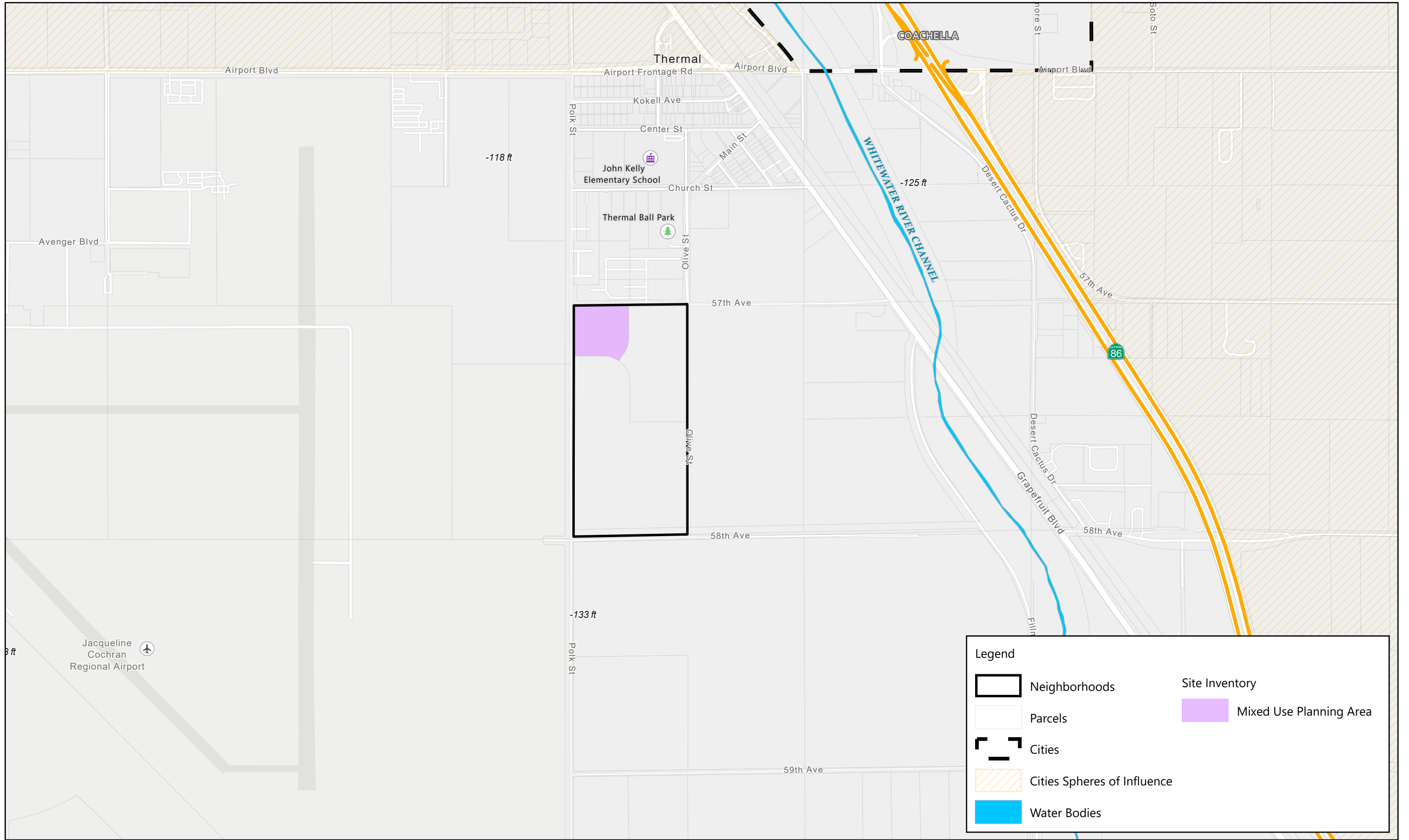
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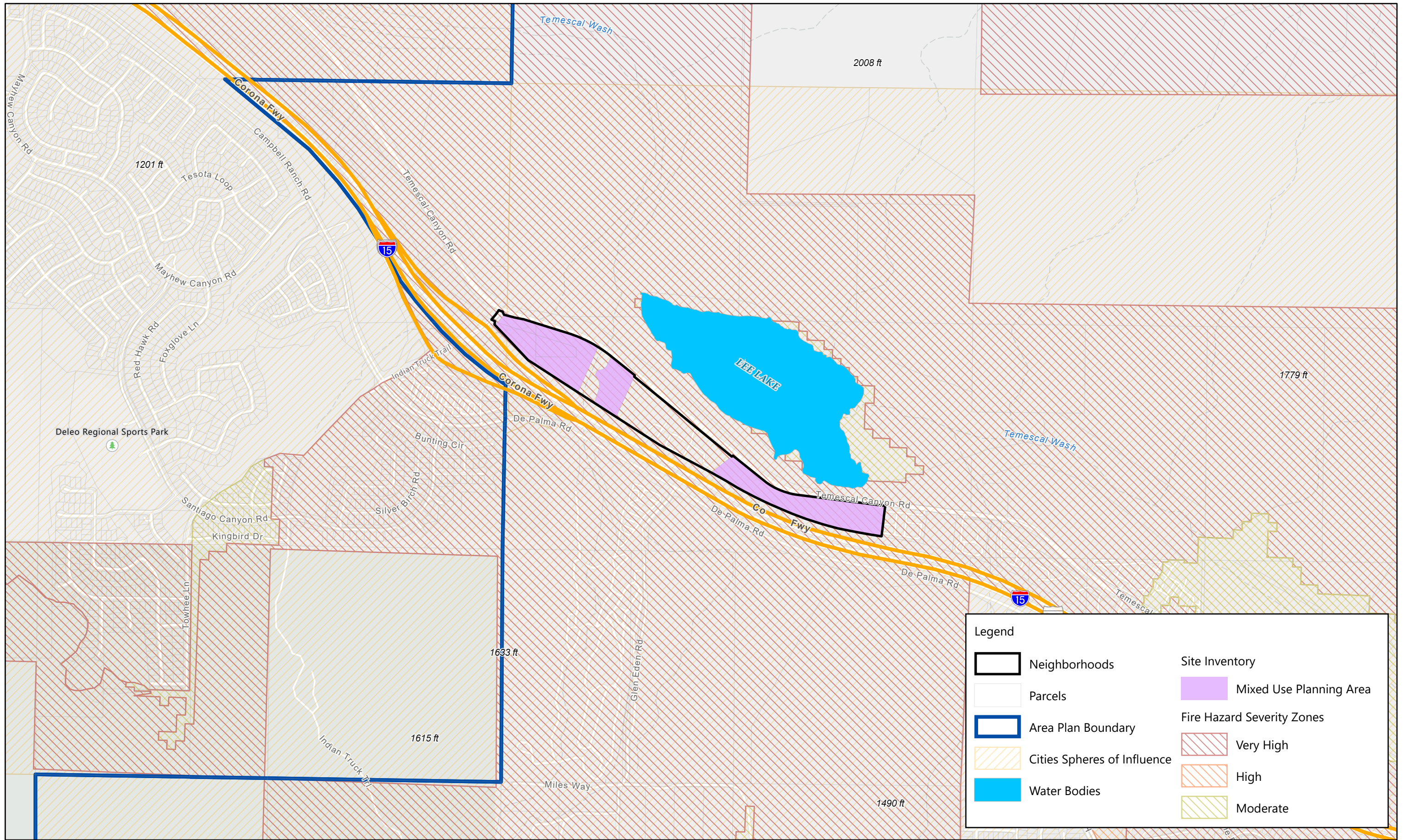


Source: ESRI, Riverside County

Figure P-16: Neighborhood Overview (West)





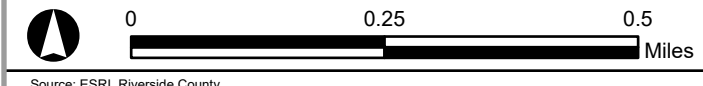


Legend

Neighborhoods	Site Inventory
Parcels	Mixed Use Planning Area
Area Plan Boundary	Fire Hazard Severity Zones
Cities Spheres of Influence	Very High
Water Bodies	High
	Moderate

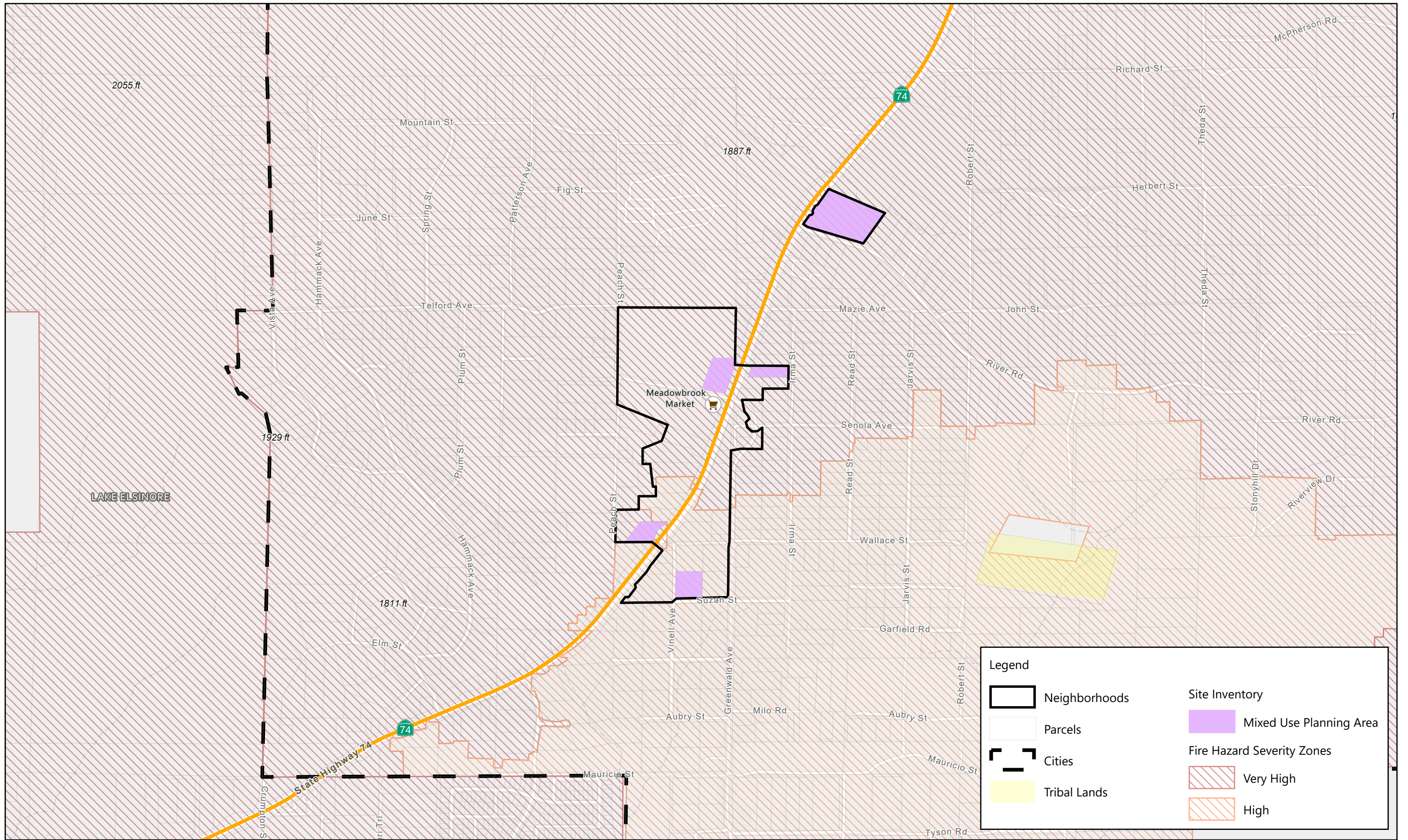


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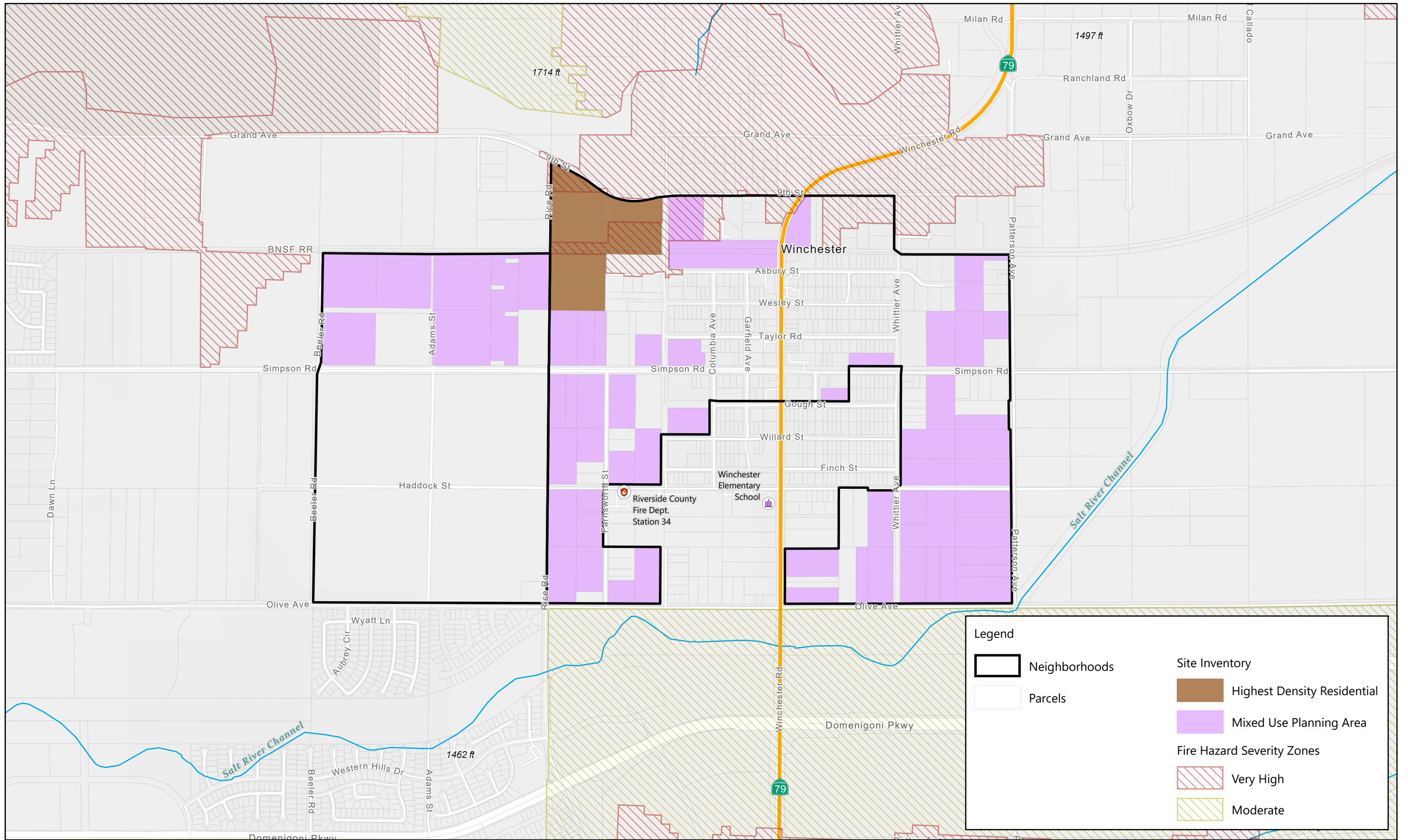
Source: ESRI, Riverside County

RIVERSIDE COUNTY 6TH CYCLE HOUSING ELEMENT
Figure P-19: Lee Lake Community



Legend

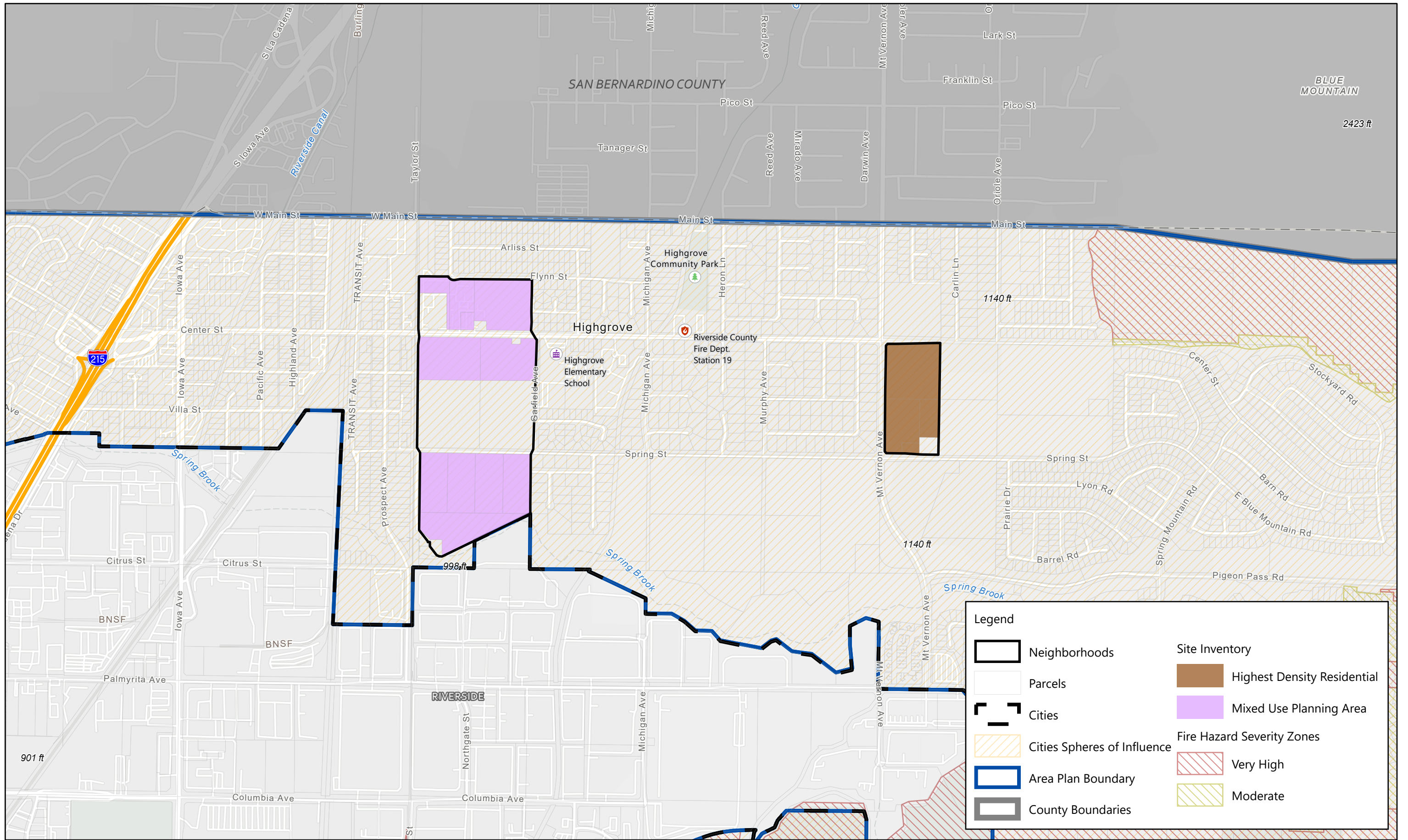
Neighborhoods	Site Inventory
Parcels	Mixed Use Planning Area
Cities	Fire Hazard Severity Zones
Tribal Lands	Very High
	High



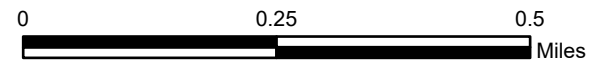
Legend

Neighborhoods	Site Inventory
Parcels	Mixed Use Planning Area
	Fire Hazard Severity Zones
	Very High
	Moderate

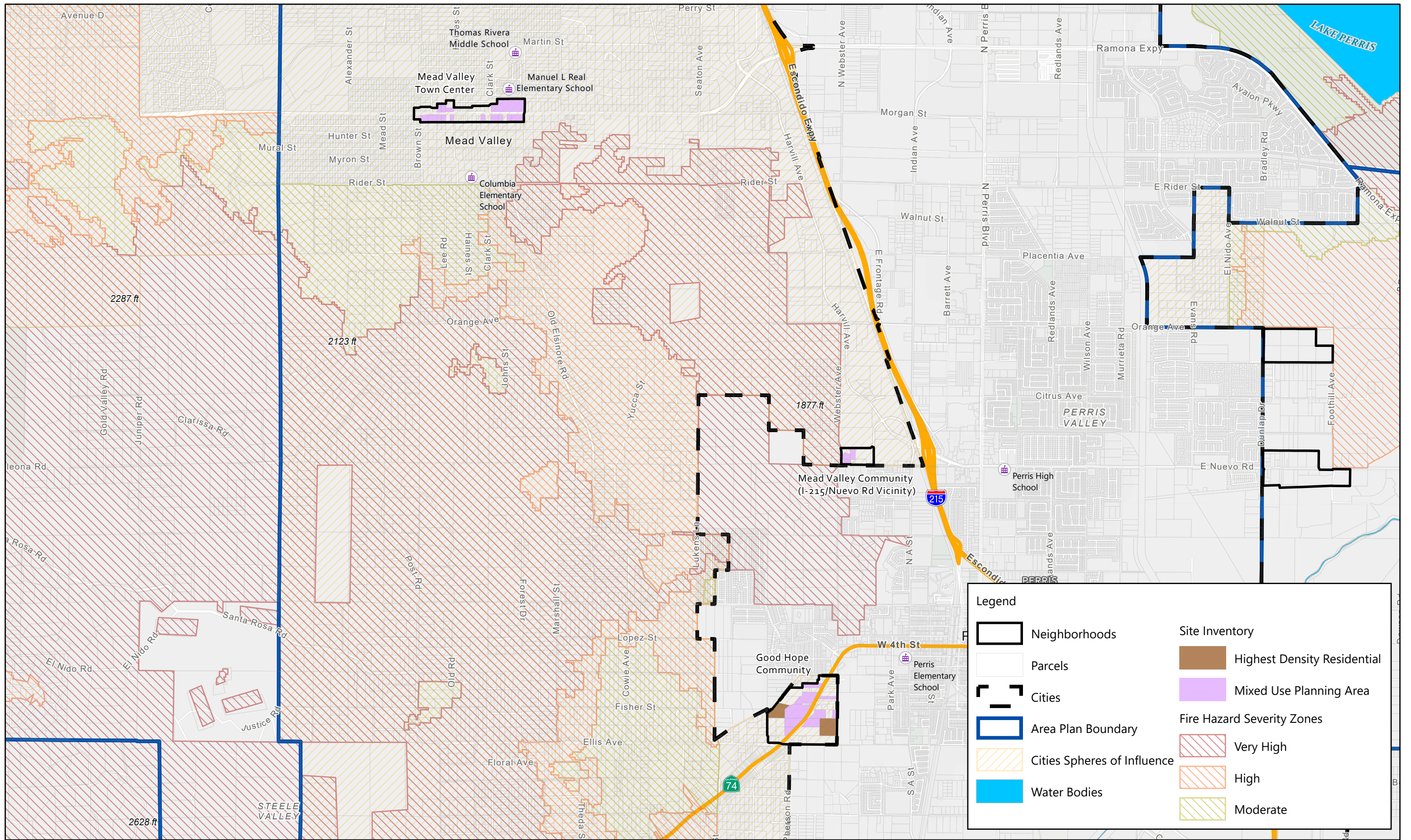
Figure P-21: Winchester Town Center & Winchester Town Center (Western Area)



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Source: ESRI, Riverside County

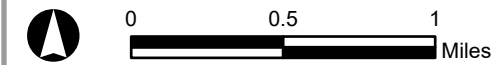


Legend

Neighborhoods	Highest Density Residential
Parcels	Mixed Use Planning Area
Cities	Fire Hazard Severity Zones
Area Plan Boundary	Very High
Cities Spheres of Influence	High
Water Bodies	Moderate

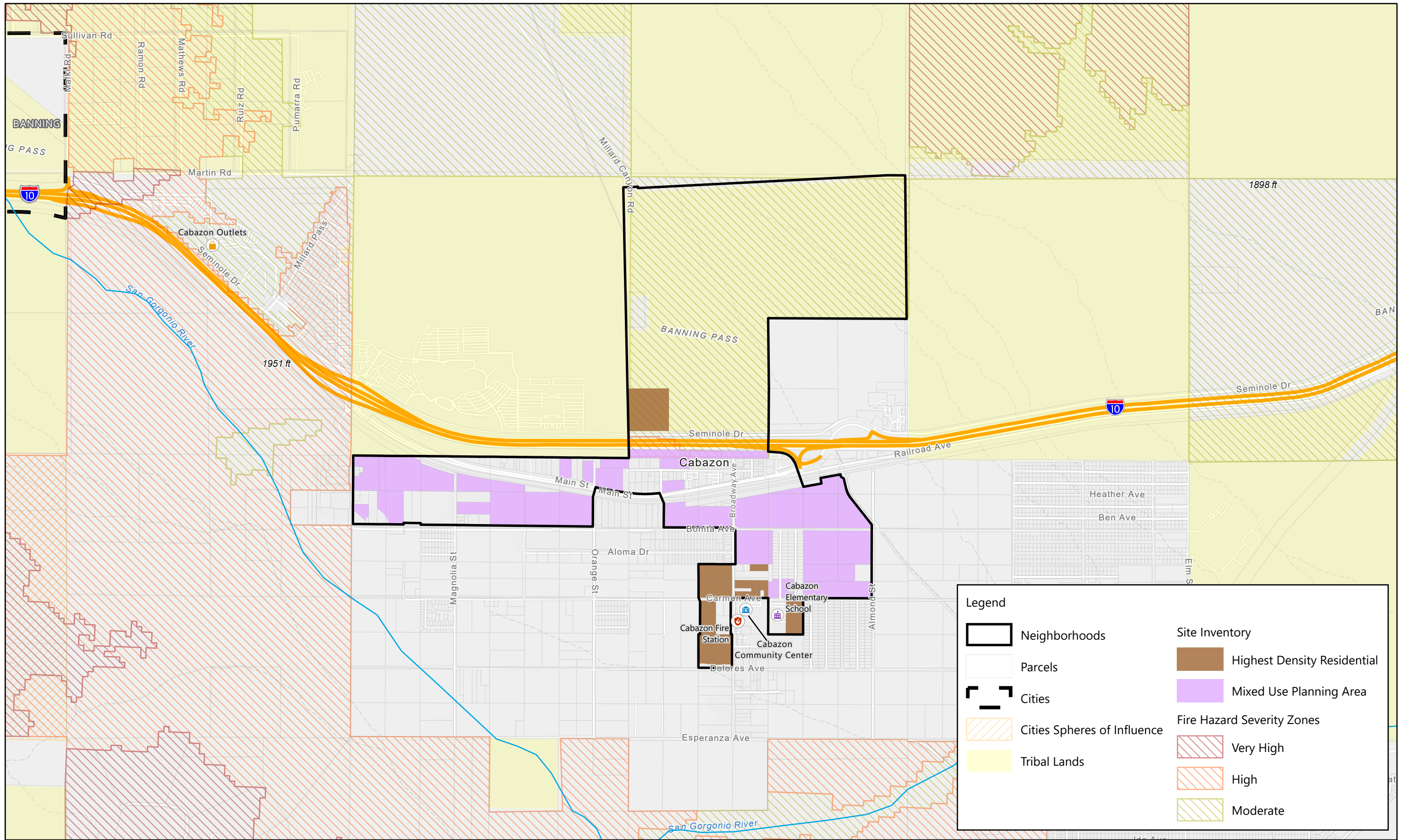


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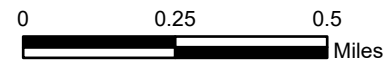


Source: ESRI, Riverside County

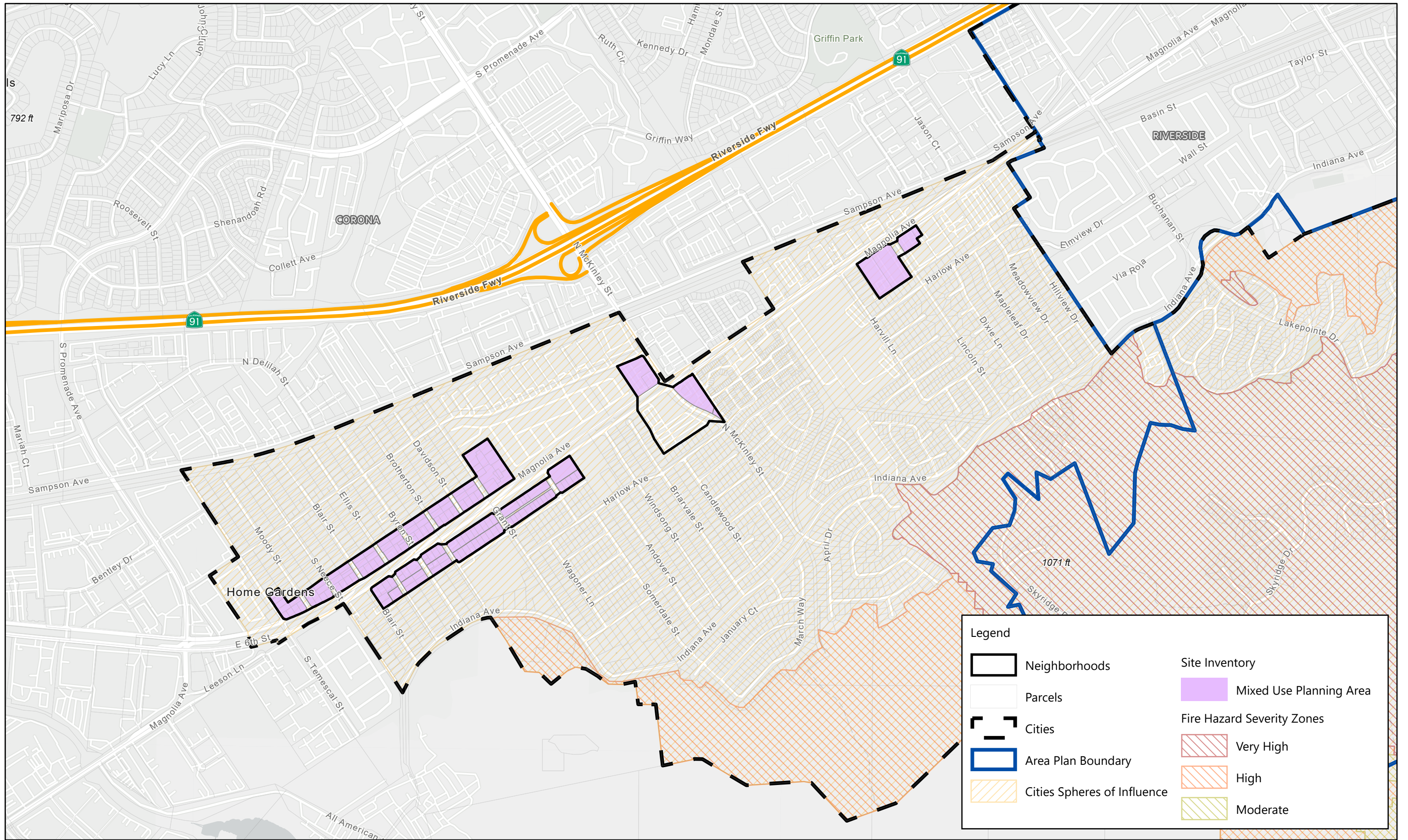
Figure P-24: Good Hope Community, Mead Valley Town Center, & Mead Valley Community (I-215/Nuevo Rd Vicinity)



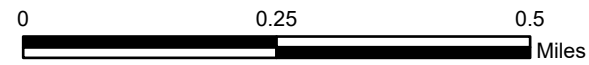
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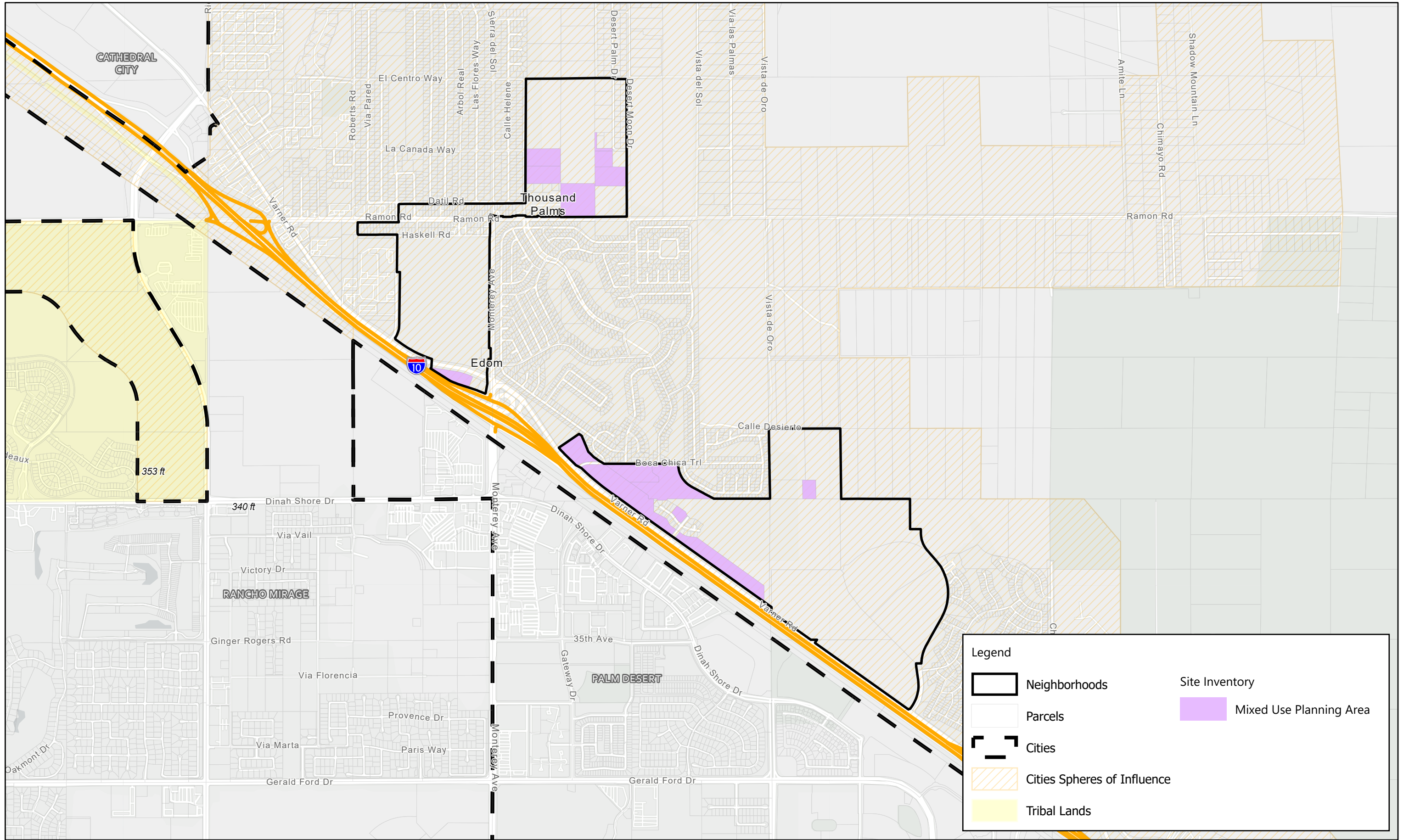
Source: ESRI, Riverside County

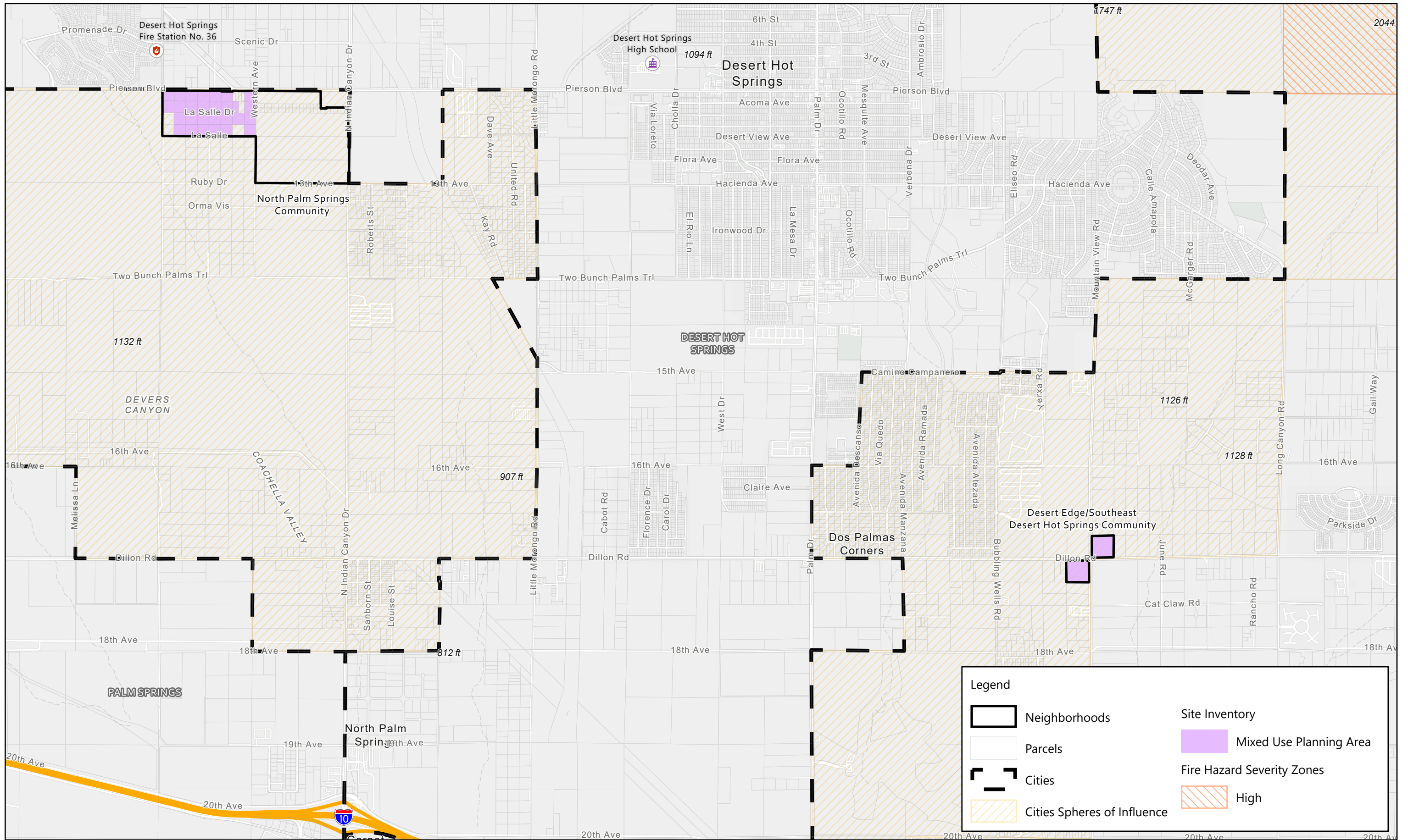


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Source: ESRI, Riverside County





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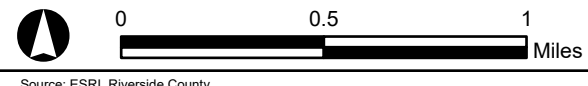
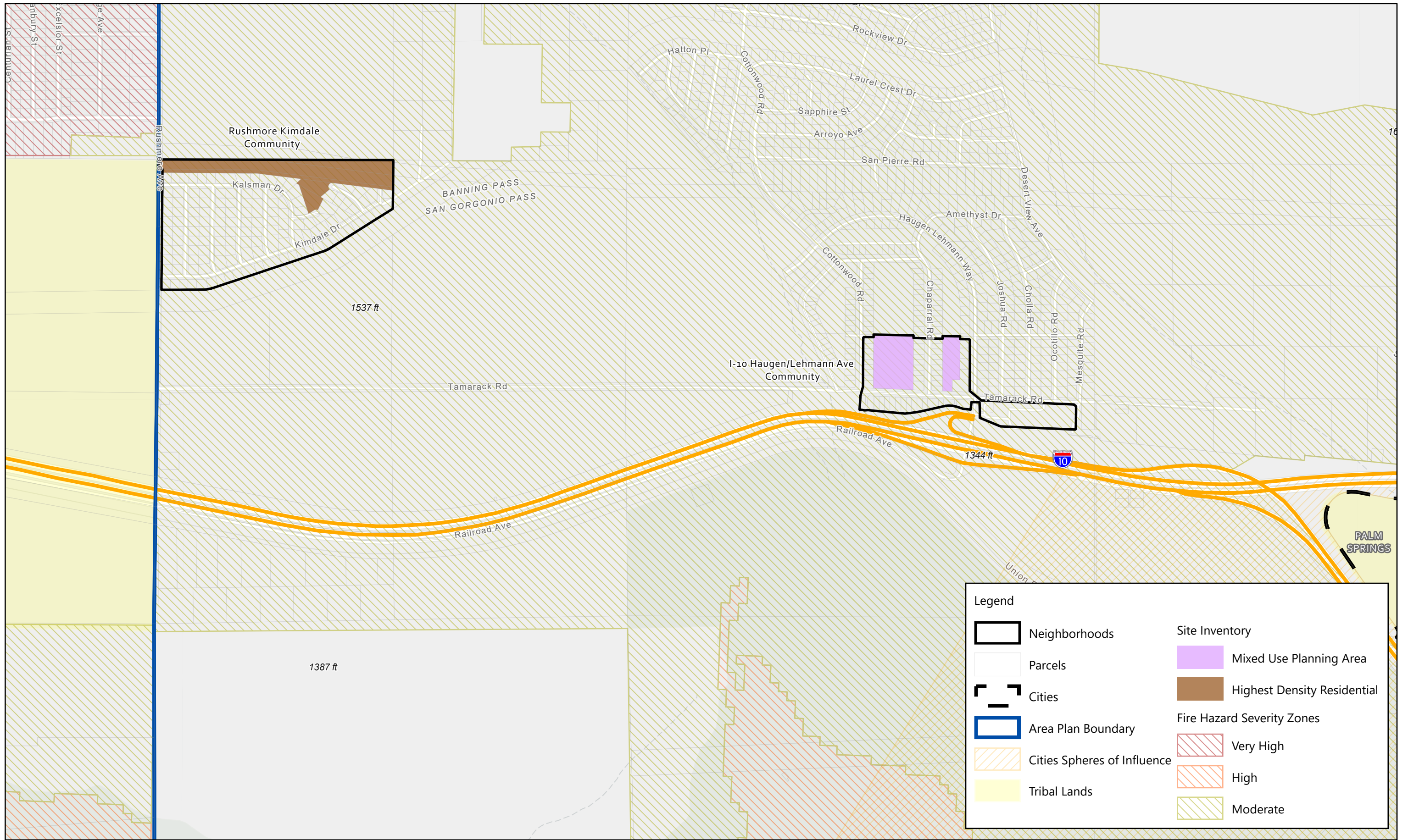
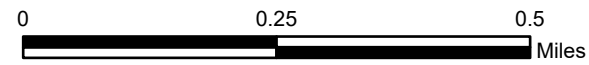


Figure P-28: Desert Edge/Southeast Desert Hot Springs Community & North Palm Springs Community



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Source: ESRI, Riverside County

Figure P-29: Rushmore Kimdale Community & I-10 Haugen/Lehmann Ave Community

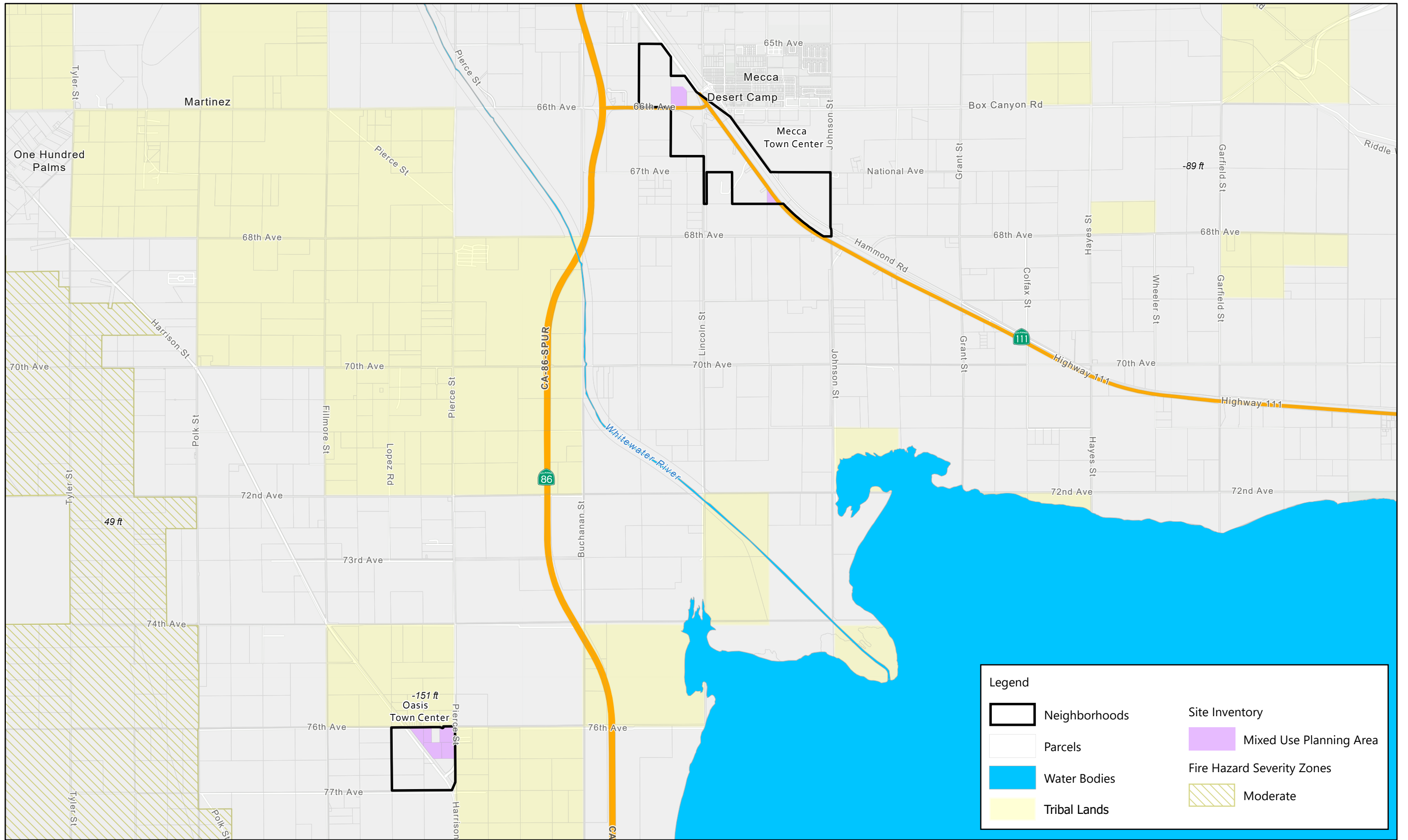


Figure P-30: Mecca & Oasis Town Center

Draft Housing Element -- Response to Comments

August 12, 2021 Letter from Leadership Counsel for Justice and Accountability, et al.
Responses to the above letter track the designated sections in the letter.

I. Failure to Demonstrate A Diligent Effort to Solicit and Incorporate Input from All Economic Segments of the Community and Protected Classes

- A. Failure to Adequately Engage the Public, Demonstrate Inclusion of Low-Income Populations, Groups with Special Housing Needs, and Protected Classes
- B. Failure to Adequately Describe and Demonstrate Incorporation of Public Input

Provided between October 2020 and December 2020, the County conducted twelve (12) meetings at its community councils and municipal advisory councils throughout the unincorporated area to seek community input to help determine the parameters of the Housing Element. All of the above sessions provided Spanish language translations, as needed.

Additionally, two (2) community outreach meetings were conducted in February 2021 using a virtual workshop platform and presentations were given in both English and Spanish. This effort and the input received resulted in the drafting of Housing Element polices.

A Planning Commission workshop was also conducted in February 2021 to seek input from Planning Commissioners and additional input from the public.

While participation at some meetings were limited, the County used all available means, including electronic and traditional, to attract participants to the venues whether they were in person or online. The County's outreach efforts attracted a diverse group of participants including those representing special interest groups.

Because housing is a focus of many agencies, special interest groups, and community-based organizations, the County reached out to forty (40) such entities. It received responses from seven (7) of the entities in December 2020. The number of responses received tracked the level of participation achieved with respect to the community outreach described in the above community outreach paragraph. Overall, the input provided benefitted the preparation of the draft Housing Element.

The culmination of the County's outreach effort was the dissemination of a public survey between February 2021 and March 2021 to gauge additional sentiment and thoughts on the County's housing needs. A comprehensive summary of the community outreach effort and the stakeholder/community-based organization effort including specific input received and responses provided is contained in Housing Element Appendix P-1, pages P-189 through P-211. All of the above information is also set forth on the County's TLMA Planning website. Additional opportunity for comment on the County's 6th Cycle Housing Element was provided between July 8, 2021 through August 16, 2021. Opportunity for comment was also provided at the September 1, 2021 Planning Commission public hearing on the draft Housing Element and an additional opportunity for comment will be provided on September 28, 2021 at the Board of Supervisors public hearing on the draft Housing Element.

C. The County's Submission of the Draft to HCD Before the End of the Public Comment Period Undermines Public Participation

The County's outreach (public participation) effort essentially encompassed the Fall of 2020 and Winter of 2020 and was concluded when the effort was detailed in Housing Element Appendix P which was released for additional input and comment in July 2021. The draft was posted on the County's website and all meeting attendees, service providers and others involved in the Housing Element process were directly notified when the draft was released. Therefore, concurrent submittal of the Housing Element for review by HCD in no way compromises the public participation effort as the latter had been concluded when the draft Housing Element was submitted for HCD review. Additionally, overlapping of the review efforts has been necessary because of the tight timelines associated with achieving adoption of the 6th Cycle Housing Element on or before October 15, 2021 as required by state law.

D. Failure to Align Outreach for Environmental Justice Element Development and Housing Element Update

While there are overlaps between Environmental Justice requirements and the Housing Element work, such as promoting fair housing policies and safe and sanitary housing, essentially, the two efforts serve different purposes with environmental justice focused on addressing and remediating environmental constraints and the housing element work focused on providing new dwelling units to meet county housing needs. Additionally, timeframes associated with the respective efforts are different. Therefore, staff has received Board of Supervisors approval for its environmental justice effort through amendments to the Land Use Element and Healthy Communities Element, while the legal timeframe for adopting a Housing Element update is October 15, 2021. Also, it should be noted that there is no legal requirement for the two efforts to be concurrently completed.

II. Failure to Evaluate the 5th Cycle Housing Element Consistent with Section 65588(a)

HCD certified the County's 2013-2021 Housing Element (5th Cycle) and the Mid-Cycle Housing Element Update (2017) with the goals, polices, and action items contained therein. Pursuant to Government Code Section 65588, the County has completed its evaluation of these two elements as provided in draft Housing Element Appendix P, pages P-5 through P-42. The critical components of the Housing Element are production figures encompassing the eight-year 5th Cycle Housing Element period provided through the Annual Progress reports, as well as the table containing the implementation status of the items constituting the 8 Year Action Plan beginning on page P-7. Also as required by Section 65588, the County provides a bullet listing of efforts to address special housing needs. Therefore, the County's responses in compliance with Section 65588 are limited to the goals, polices and action items approved by HCD as contained in the 5th Cycle Housing Element and the-Mid Cycle Update.

III. Inadequate Sites Inventory Analysis

A. Unwarranted Reliance on the Valante and Travertine Pointe Specific Plans to Accommodate 1,609 Lower-Income Units

County specific plans are private sector initiated regulatory or zoning level documents for the development of new residential or mixed-use communities. As such, until they are amended, buildout is expected to proceed according to the requirements contained therein with the pace of development proceeding according to the private sector proponent's business plans. Therefore, the County's reliance on the number of units to be produced and the affordability levels is reasonable until the specific plan is changed or otherwise amended. Any other determination at the present would be speculative.

B. Failure to Adequately Analyze Underutilized Sites' Realistic Development Potential

Intensification or densification of underutilized sites depends on several factors including the availability of or planned infrastructure, the availability or planned services, synergy for change primarily dependent on developer and current owner interest, lack of physical and environmental constraints, access to multimodal transportation systems, access to employment, availability of public amenities, and a local governing structure. The County's Housing Element sites, both underutilized or vacant have considered the above criteria before being considered as site inventory to accommodate RHNA housing units. Until synergies are established around landowner and developer interests, further analysis of underutilized sites would not be a productive use of time or resources. While the County believes these underutilized parcels to be appropriate to accommodate a portion of the lower income RHNA, the County has removed these sites from the inventory.

C. Failure to Include a Program and Policy Requiring Replacement of Existing Affordable Units on Nonvacant Sites Pursuant to Section 65583.2(g)(3)

To ensure future developments comply with Government Code Section 65583.2 (g)(3), the County has included Housing Action #H-32 of the draft Housing Element to address this concern.

D. Reliance on Sites Included in 5th Cycle HE Sites Inventory Without Required Rezoning Program

Adoption of the 5th Cycle Housing Element included a rezoning program whereby housing sites to accommodate the RHNA targets included land use designations and consistent zoning to allow for site development. The proposed draft 6th Cycle Housing Element sites do not include rezoning program at this time. The County will continue to rely on sites designated for lower income households as these sites were designated in the 2013-2021, 5th Cycle Housing Element. The threshold criteria of two or more consecutive planning periods (cycles) has not yet passed which would otherwise preclude their continued use.

E. The Draft Element Fails to Include the Requisite Analysis to Rely on Sites Located on Tribal Land

Tribal lands located in the Travertine Specific Plan and in the Cabazon area were not used to site dwelling units to meet RHNA targets.

F. Inadequate Support for Reliance on 1,864 units Lower-Income Capacity From Mobile and Manufactured Homes

The draft Housing Element has been revised to include additional analysis on mobile/manufactured housing costs including transportation costs, county fees, installation, landscape, etc, as well as

calculating the annual assumption basing this on the past seven years (2014 – 2020) instead of only 2018 and 2019 data.

G. The Draft Element Fails to Describe Environmental Constraints or Analyze Their Impacts on Inventory Site Capacity

Many of the sites designated to accommodate RHNA targets from the 5th Cycle Housing Element have been carried forward to accommodate RHNA targets for the 6th Cycle. The commentor focuses on environmental constraints caused by potential development in flood prone and high fire hazard areas. Identification of sites for the 5th Cycle took into consideration the need to have development avoid such areas. Therefore, none of the housing sites are constrained by mapped fire hazard or flood prone areas. To the extent that staff may have misinterpreted the boundaries of these environmental constraints, the constraints would be captured during the various forms of plan check review and review by the various fire control agencies and the county's flood control department or agency with appropriate recommendations, including in the extreme, halting project development. Additionally, county codes address flood and fire hazard conditions with the former requiring grading to modify flood prone and drainage areas by elevating development out of the flood zone and for the latter by requiring fire retardant building materials, fire resistant landscaping, building spacing, access to water sources, and emergency vehicle access.

IV. The Draft's Assessment of Fair Housing Fails to Comply with Section 65583(c)(10)

A. Failure to Analyze Disproportionate Housing Needs and Displacement Risks Impacting Protected Classes

The draft Housing Element has been revised to further analyze the sites inventory and disproportionate housing needs as a part of the Assessment of Fair Housing. Additionally, actions have been revised to address displacement risks impacting protected classes.

B. Failure to Assess Disparities in Access to a Healthy Environment

In this subsection IV.B. and to a limited extent in subsection IV.A., the commentor lists environmental constraint criteria that are covered by the County's response to SB1000 which addresses the topic of environmental justice by requiring local governments to adopt a general plan environmental justice element or to include environmental justice policies in other general plan elements. The County chose the latter by amending its Land Use Element and Healthy Communities Element in compliance with SB1000 with recent adoption by the Board of Supervisors. The County's documentation includes a framework for SB1000 compliance and a mapping of environmental justice communities in the Land Use Element, environmental justice policies contained in the Healthy Communities Element, and an Implementation Plan. The environmental constraint areas listed by the commentor are captured in the Healthy Communities Element policies. The policies are implemented through guidance provided by the Implementation Plan either through development projects or through interagency efforts affecting multiple jurisdictions. There is no need to duplicate the environmental justice work in the draft 6th Cycle Housing Element. On September 21, 2021, the Board of Supervisors gave final adoption to the SB1000 compliance components of the Land Use Element and Healthy Communities Element.

C. Failure to Demonstrate That Sites Inventory AFFHs

The draft Housing Element has been revised to further analyze the sites inventory as part of the Assessment of Fair Housing.

V. Governmental Constraints Analysis Deficiencies

Draft 6th Cycle Housing Element Action # H-7 requires the County to address Reasonable Accommodation, including the criteria for siting parolee-probationer homes. An extensive discussion of government constraints on the production of housing is provided on pages P-141 through P-173 of the draft Housing Element's Appendix P.

The requirements of SB 330 are discussed on pages P-172 and P-173 of the draft Housing Element's Appendix P. The additional narrative requested by the commentor to augment the discussion of SB330 regarding relocation and replacement housing has been included in a new Action # H-32 on page H-20 of the draft Housing Element.

The Board of Supervisors recently adopted Ordinance No. 348.4950 which amended the county's Land Use Ordinance No. 348 regarding employee housing. Sections 1-4, 12-28, and 37 of Ordinance No. 348.4950 address the commentor's request.

VI. Failure to Adopt Programs That Will Result in A Beneficial Impact During the Planning Period and AFFH

- Action H-1 - Sites to Accommodate the Regional Housing Needs Assessment (RHNA) Allocation.

Action # H-1. The County has identified sufficient capacity to accommodate the RHNA and therefore this will be an ongoing action throughout the 8-year Housing Element timeframe. Progress in meeting RHNA targets will be provided in the annual progress reports presented to HCD.

- Action H-2 – Infrastructure Availability and Coordination.

The County is responsible for providing roads and related infrastructure such as trails and sidewalks, flood control facilities, and solid waste disposal. Requirements for such facilities are contained in various standard plans and the General Plan. Construction plans, phasing, and financing are contained in short term and long-range master plans. The commentor should review plans for such facilities and address concerns by contacting the Transportation and Land Management Agency and the Chief Executive Office. Other key infrastructure components such as water and sewer are provided by other agencies such as water and sewer districts. Service priorities for water and sewer should be addressed through these districts. Contact information for these districts is available through the state Local Agency Formation Commission serving Riverside County.

- Action H-7 – Land use (zoning) ordinance amendments.

Please see response to comment, above -- V. Governmental Constraints Analysis Deficiencies

- Action H-10 – Innovative Housing Options.

The County currently allows for flexibility in the housing stock by providing a variety of housing options, such as ADUs, junior ADUs, tiny houses, inclusionary housing, container housing, Polanco parks,

Ranchettes, MOG (Multi-Owner Group Unit) and other alternative housing types. The county will annually promote these housing types to assist with the development of affordable housing

- Action H-12 – Inclusionary Housing Requirements.

Establishing inclusionary housing requirements is one way of achieving the production of lower income housing units. However, it is not the only way as described in Action # H-12. The County will proceed with various means of requiring lower income dwelling units pursuant to Action # H-12. Nevertheless, the commentor's concerns are noted and will be addressed should alternative means of providing lower income housing units are not successful.

- Action H-13 – Code Enforcement.

The County's code enforcement staff ensures that occupancy of buildings and related features occurs in a safe manner. This occurs through site visits based on a complaint and through site visits when a building inspector checking on new construction notices a code violation; the public is educated on the code enforcement process when code enforcement officers provide presentations to educate the public at community councils and municipal advisory committee meetings. The County has been successful at remediating code violations through these means. Based on the availability of staff and resources, the County will continue to address its code enforcement process in the present manner. Additionally, as stated in revised Action # H-13, the County will evaluate its code enforcement programs to determine if a proactive form of code enforcement would be beneficial and effective based on experience and data gained from continuing with current practices. Pursuing a proactive form of code enforcement will require additional resources and funding.

- Action H-17 – Mobile Homes.

Addressing the commentor's concerns regarding revising Action #H-17 cannot be undertaken in the abstract with criteria that will not be known until production of mobile homes occurs after adoption of the 6th Cycle Housing Element. The commentor's concerns are noted with the criteria identified which can be adapted as the County evaluates compliance with Action # H-17 in the annual progress reports provided to HCD. Additionally, the County will assist as funding is available and will apply as Notice of Funding Available (NOFAs) are released.

- Action H-19 – Polanco Parks Program.

Pursuant to Action #H-19, it is expected that a review and evaluation of Polanco Park Programs will result in action items such as that recommended by the commentor – property management education, education on best management practices, and development of a Polanco Parks housing directory. However, pursuit of the commentor's recommendations and others to come from the review and evaluation will not be known until such an effort is undertaken. Please see also Action #H-14 (mobile home rehabilitation funding), and Action #H-17 (reduction of displacement risk for mobile home occupants) as programs being proposed in the draft Housing Element. The County will review and evaluate the existing lending processes by January 2022.

- Action H-20 – Persons with Disabilities.

Action # H-20 provides direction to the County for addressing the needs of the disabled. Development criteria for access to disabled persons is provided in the California Building Code which, with some modifications, has been adopted by the County and with which it must comply. The County will reach out to non-profit agencies and coordinate with the Inland Regional Center at least twice during the planning period.

- Action H-22 – Housing Choice Voucher Program.

The County will continue to administer the Housing Choice Voucher Program (Section 8 assistance) through the Riverside County Housing Authority and promote the use of Housing Choice Vouchers in high-opportunity areas to facilitate mobility between high- and low-resource areas regardless of income.

- Action H-23 – Monitor At-Risk Units.

Action H-23 includes timelines assumed for all projects at-risk of converting to market rate, which includes Paseo de los Poetas.. Its status will be updated in the annual progress reports provided to HCD.

- Action H-27. Improve Low Income Areas Access to Opportunities.

H-27 has been revised to include additional fair housing efforts and includes specific timeframes to complete these actions within the bullets listed..

- Action H-28 – Homeless Collaboration.

H-28 was revised to include that the county will collaborate with the County of Riverside CoC at least twice during the planning period.

The end of the commentor's letter notes a number of programs which are being recommended. Staff responses are provided below:

- RHNA targets for the 6th Cycle Housing for the next eight years are for production units. The commentor's reference to vacation homes does not affect this production effort. Therefore, should the County choose to undertake a study on the pricing of vacation homes, it would be undertaken independent of the Housing Element effort. Ordinance No. 927 regulates short term vacation rentals. Such rentals pay transient occupancy taxes which supplement the county's general fund. If the commentor is interested in reallocating these funds in support of affordable housing, the Chief Executive Office should be contacted for that purpose. Regarding inclusionary zoning requirements, please see response to comment to Action H-12.
- Regarding water and sewer as a priority for affordable housing, please see response to comment to Action H-2.
- Surplus County land and other public lands not needed for a government purpose has been used for the production of affordable housing and related amenities through the county's Housing, Homeless Prevention, and Workforce Solutions Department which has been successful in the production of affordable housing.

- Action # H-15 provides for a weatherization program by offering assistance to low-income households through the county’s Community Action Partnership.
- Please see pages S-27 to S-29 of the Safety Element for a discussion of climate adaptation strategies and the policies associated therewith on page S-29. An update to the Safety Element is being processed concurrently with the 6th Cycle Housing Element.

August 16, 2021 Letter from Public Interest Law Project

Responses to the above letter track the designated sections in the letter.

Needs of Unhoused People

The draft housing Element includes a new section – Assessment of Fair Housing, which addresses these concerns and several fair housing actions, and homeless actions are included in the element.

Reasonable Accommodation Ordinance

Section 1.12 of the county’s Land Use Ordinance No. 348 is the county’s reasonable accommodation ordinance. Within the context of Section 1.12, the draft 6th Cycle Housing Element Action # H-7 commits the County to reviewing the administrative process for considering reasonable accommodation requests “within one year of the adoption of the Housing Element”. However, the County has not received any applications for reasonable accommodations since the adoption of the Mid-Cycle Housing Element Update in 2017. While the County is prepared to commit to the above timeframe, it may defer the analysis until a reasonable accommodation application is received so that a review is not conducted in the abstract. Staff will retain the commentor’s letter to ensure that when such a review is conducted, the issues raised on pages 2 and 3 of the commentor’s letter are addressed.

August 16, 2021 Letter from Leadership Counsel for Justice and Accountability, et al.

Responses to the above letter track the designated sections in the letter.

I. Release the Draft Housing Element for Public Review Before Submission to HCD

The County’s outreach (public participation) effort essentially encompassed the Fall of 2020 and Winter of 2021 and was concluded when the effort was detailed in Housing Element Appendix P, which was released for additional input and comment in July 2021. Therefore, concurrent submittal of the Housing Element for review by HCD in no way compromises the public participation effort as the latter had been concluded when the draft Housing Element was submitted for HCD review. Additionally, overlapping of the review efforts has been necessary because of the tight timelines associated with achieving adoption of the 6th Cycle Housing Element on or before October 15, 2021 as required by state law.

II. Comprehensive Polanco Park Permitting Program

A. Three Year Moratorium on Fines and Code Enforcement

The County cannot compromise public health and safety and therefore will not enact any moratorium on fines and code enforcement. However, recognizing Polanco residents’ limited resources, TLMA’s

Code Enforcement Division will work with residents to address code violations in a fair, reasonable, and compassionate manner to ensure that healthy and safe conditions are restored, and code violations are remediated.

- B. Create an Eastern Coachella Valley Polanco Park Housing Directory
- C. Polanco Property Management Education Program
- D. Mobile Home Replacement

Pursuant to Action #H-19, it is expected that a review and evaluation of Polanco Park Programs will result in action items such as that recommended by the commentor – property management education, education on best management practices, and development of a Polanco Parks housing directory. However, pursuit of the commentor’s recommendations and others to come from the review and evaluation will not be known until such an effort is undertaken. Regarding the general topics of mobile home repair and replacement, please see also Action #H-14 (mobile home rehabilitation funding), and Action #H-17 (reduction of displacement risk for mobile home occupants) as programs being proposed in the draft Housing Element.

III. Community Participation in Regional Housing and Community Development

- A. Housing Element Advisory Committee
- B. Restructure Eastern Coachella Valley Community Councils

A Housing Element Advisory Committee would be an advisory body and the Eastern Coachella Valley Community Councils are existing advisory bodies charged with providing input to the county on housing related matters regarding the former and with respect to community issues regarding the latter. To the extent that these entities would be and have been created in coordination and consultation with TLMA, the Chief Executive Office, and the Board of Supervisors, the commentor is advised to reach out directly to request what is being proposed in the commentor’s letter.

- C. Review Housing Review Committee Efficacy Efficiency

Similar to the discussion above, this committee is a standing advisory committee on housing related issues. Because the commentor is proposing a formal evaluation process regarding the committee’s work, such a request should be forwarded to the TLMA administrative office and the Chief Executive Office.

- D. Community Outreach During Housing Element Development Process

Between October 2020 and December 2020, the County conducted twelve (12) meetings at its community councils and municipal advisory councils throughout the unincorporated area to seek community input to help determine the parameters of the Housing Element. All of the above sessions provided Spanish language translations, as needed.

Additionally, two (2) community outreach meetings were conducted in February 2021 using a virtual workshop platform. This effort and the input received resulted in the drafting of Housing Element polices.

A Planning Commission workshop was also conducted in February 2021 to seek input from Planning Commissioners and additional input from the public.

While participation at some meetings were limited, the County used all available means, including electronic and traditional, to attract participants to the venues whether they were in person or online. The County's outreach efforts attracted a diverse group of participants including those representing special interest groups.

Because housing is a focus of many agencies, special interest groups, and community-based organizations, the County reached out to forty (40) such entities. It received responses from seven (7) of the entities in December 2020. The number of responses received tracked the level of participation achieved with respect to the community outreach described in the above community outreach paragraph. Overall, the input provided benefitted the preparation of the draft Housing Element.

The culmination of the County's outreach effort was the dissemination of a public survey between February 2021 and March 2021 to gauge additional sentiment and thoughts on the County's housing needs.

A comprehensive summary of the community outreach effort and the stakeholder/community-based organization effort including specific input received and responses provided is contained in Housing Element Appendix P, pages P-189 through P-211. All of the above information is also set forth on the County's TLMA Planning website. Additional opportunity for comment on the County's 6th Cycle Housing Element was provided between July 8, 2021 through August 16, 2021. Opportunity for comment was also provided at the September 1, 2021 Planning Commission public hearing on the draft Housing Element and an additional opportunity for comment will be provided on September 28, 2021 at the Board of Supervisors public hearing on the draft Housing Element.

IV. Expand Tenant Protections

- A. Landlord/Tenant Dispute Mediation Board
- B. Pass, Fund, and Implement a Right to Legal Counsel Program
- C. County-run rental subsidy programs prioritizing undocumented and mixed-status families
- D. Emergency Housing Program
- E. Rent Control & Just Cause for Eviction

The commentor proposes what would be new programs the merits of which would have to be evaluated before becoming part of the Housing Element or implemented through other means. It is advised that the commentor contact the Chief Executive Office and the Housing, Homeless Prevention, and Workforce Solutions Department to pursue these programs.

V. Sizes of Sites in Inventory Analysis

County is relying on sites larger than 10 acres and has included an analysis with project examples starting on page P-106 of the revised draft Housing Element. The site that is smaller than 0.5 acres, although included, this site only provides for the capacity of 1 unit and is not needed to meet the County's RHNA

In addition, the County has extensive experience with the processing of developer-initiated specific plans which typically encompass larger acreages. Specific plans generally are residential with amenities supporting the housing being proposed, or are mixed use developments with services, commercial uses

and other non-residential uses providing local support for the housing located in such specific plans. The economies of scale associated with a larger project allows for the installation of infrastructure, and also allows for mixed income housing products which would be more difficult to provide on smaller sites.

VI. Actively Seek Funding for Water and Wastewater Expansion in Disadvantaged Communities

Please see response to Action H-2 in the Leadership Counsel’s August 12, 2021 letter.

VII. Prioritize Affordable Housing Developments in Unincorporated Areas

The County’s RHNA targets are solely for the unincorporated areas. The Eastern Coachella Valley contains numerous sites for housing meeting the needs of all economic segments, including opportunity for the development of very low and low income housing. Therefore, such housing was prioritized during the 2013-2021 5th Cycle Housing as it is continuing to be prioritized through the draft 6th Cycle Housing Element. The County’s Housing, Homeless Prevention, and Workforce Solutions Department has been successful in building low-income housing using the public resources mentioned by the commentor, as well as on public land, and through public-private partnerships. However, as has been extensively discussed, substantial progress in meeting RHNA targets depends on the private sector embracing the number of, product types, and affordability levels needed in new housing production.

VIII. Environmental Resilience

A. Weatherization of Mobile Home Parks

Action # H-15 provides for a weatherization program by offering assistance to low-income households through the county’s Community Action Partnership.

B. Consider Transformative Climate Communities and other Community Plans

Please see pages S-27 to S-29 of the Safety Element for a discussion of climate adaptation strategies and the policies associated therewith on page S-29. An update to the Safety Element is being processed concurrently with the 6th Cycle Housing Element.

C. Analysis of Environmental Health Factors

The analysis of environmental health factors and polices related remediating environmental health constraints are covered by the County’s response to SB1000 which addresses the topic of environmental justice by requiring local governments to adopt a general plan environmental justice element or to include environmental justice policies in other general plan elements. The County chose the latter by amending its Land Use Element and Healthy Communities Element in compliance with SB1000 with final adoption by the Board of Supervisors on September 21, 2021. The County’s documentation includes a framework for SB1000 compliance and a mapping of environmental justice communities in the Land Use Element, along with environmental justice polices contained in the Healthy Communities Element, and an Implementation Plan. The environmental constraint areas listed by the commentor are captured in the Healthy Communities Element policies. The policies are implemented through guidance provided by the Implementation Plan either through development projects or through interagency efforts affecting

multiple jurisdictions. There is no need to duplicate the environmental justice work in the draft 6th Cycle Housing Element. On September 21, 2021, the Board of Supervisors gave final adoption to the SB1000 compliance components of the Land Use Element and Healthy Communities Element.

IX. Promote Inclusionary Housing

Establishing inclusionary housing requirements is one way of achieving the production of lower income housing units. However, it is not the only way as described in Action # H-12. The County will proceed with various means of requiring lower income dwelling units pursuant to Action # H-12. Nevertheless, the commentor's concerns are noted and will be addressed should alternative means of providing lower income housing units not be successful.

September 20, 2021 letter from the Sierra Club, San Geronimo Chapter

In addition to providing comments on draft Housing Element and the draft Safety Element, this letter includes a proposal for a regional affordable housing plan and proposes changes to certain policies contained in the Eastern Coachella Valley Area Plan.

The Sierra Club letter was received on September 20, 2021, approximately three (3) weeks after the Riverside County Planning Commission provided its September 1, 2021 recommendation to the Board of Supervisors for adoption of the draft Safety Element and draft Housing Element, both of which are posted on County's Planning Department website. Because the letter proposes substantive changes to various components of the county's General Plan, the Board of Supervisors relies on the Planning Commission's recommendations before considering the nature of the changes proposed in the letter. Therefore, the requests in this letter should have been presented to the Planning Commission at its September 1, 2021 public hearing on the draft Safety Element and the draft Housing Element, and as such would not be considered at the Board of Supervisors public hearing on the draft Housing Element and the draft Safety Element scheduled for September 28, 2021. Nevertheless, staff looks forward to engaging with the letter's commentors throughout the elements' public implementation process on the concerns raised by the Sierra Club.