



*City of*  
**JURUPA VALLEY**  
*California*

## 2019-2020 ANNUAL ACTION PLAN

May 2, 2019

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# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

The 2019-2020 Annual Action Plan for the City of Jurupa Valley satisfies federal requirements to receive Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD).

The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for low- and moderate-income individuals.

Each activity to be undertaken with CDBG funds must meet one of the three national objectives:

- Benefit low and moderate-income persons,
- Aid in the prevention or elimination of slums and blight, or
- Meet a community need having a particular urgency.

In order to receive CDBG funds, the City must prepare a Consolidated Plan. The Consolidated Plan is a multi-year strategic plan that identifies priority housing and community needs. It also identifies the activities the City will implement over a five-year period to address needs. The Action Plan, a component of the Consolidated Plan, is the City's annual expenditure plan for the use of CDBG funds to address the needs identified in the Consolidated Plan.

The 2019 federal budget was approved on February 15, 2019, almost five months late. On April 12<sup>th</sup>, HUD posted funding allocations for 2019 - the City will receive \$1,203,797 in CDBG funding (\$23,797 more than the City's 2018 grant). No additional prior year CDBG funds or program income will be available to fund eligible housing rehabilitation activities.

The 2019-2020 Action Plan details the specific activities the City will undertake with CDBG funds to address housing and community needs identified in the Consolidated Plan. Planned activities include housing rehabilitation, public infrastructure improvements, public social services grants, and program administration (including fair housing services).

### 2. Summarize the objectives and outcomes identified in the Plan

The City's overall objective for the CDBG program, as specified in the Strategic Plan section, mirrors HUD's overall objective for the program: to create a viable community by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. To accomplish this objective in Jurupa Valley, the following Consolidated Plan goals have been identified based on the input of residents and other community stakeholders:

- Conserve the existing supply of affordable housing by supporting the provision of federal rental assistance vouchers and certificates administered by the Housing Authority of Riverside County.
- Assist with the preservation of the City's owner-occupied single-family housing stock.
- Support housing and services for the homeless and those at risk of becoming homeless.
- Support community social services benefitting low- and moderate-income persons and those with special needs.
- Provide needed public infrastructure and facility improvements benefitting low- and moderate-income persons and those with special needs.
- Ensure quality, professional administration of federal funds, including the provision of fair housing services to address discriminatory actions that impede access to housing.

### **3. Evaluation of past performance**

FY 2018-19 is the first year of the City's 2018-2022 Consolidated Plan cycle and as a CDBG-entitlement community. Activities funded in the 2018-19 Annual Action Plan will be completed by June 30, 2019; therefore, there is no past performance to report at this time.

### **4. Summary of Citizen Participation Process and consultation process**

The participation of residents and community stakeholders in prioritizing the use of CDBG funds is an important component of the Consolidated Plan (and Action Plan) planning process. For the 2019-2020 Action Plan, the City obtained public input in a variety of ways:

- The City established the Community Development Advisory Committee (CDAC), a five-member committee of City resident charged with evaluating and recommending public service grant for the City Council's consideration. On February 22, 2019, an informal meeting was held by the City to advise potential committee members and public service grant applicants of the upcoming committee appointment and grant application process.
- On March 22, 2019, the newly-appointed CDAC held its first meeting at which grant applicants presented their request for public service grant funding and the Committee accepted other public input regarding CDBG public service grant funding.
- March 28, 2019, the second CDAC meeting at which additional public input regarding CDBG public service grant funding was provided and the Committee developed funding recommendations for the City Council's consideration.
- On April 2, 2019, a notice was published in the *Press Enterprise* announcing the required 30-day public comment period for the draft 2019-2020 Annual Action Plan. The notice also announced 2019-2020 public hearing to be held by the City Council.
- A public hearing was held on May 2, 2019, for the City Council to accept additional public input regarding the draft 2019-2020 Annual Action Plan and to authorize submission of the plan to HUD.

## **5. Summary of public comments**

No public comments were received during the public review period or public hearing. Three of four public service grant applicants spoke at the City's CDAC meetings. Applicants provided Committee members with information regarding service needs of the homeless and seniors. They also provided clarification regarding their respective application and funding request. A summary of comments is provided in section AP-12 and **Attachment 1**.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments and views were accepted – none were rejected.

## **7. Summary**

The 2019-2020 Annual Action Plan is the second year of the 2018-2022 Consolidated Plan cycle. The Annual Action Plan is the City's one-year expenditure plan for CDBG funds. HUD announced the City will receive \$1,203,797 in CDBG funds for FY 2019-20.

The Action Plan details the activities the City will undertake with CDBG funds in support of the broader goals and objectives of the Consolidated Plan. Activities planned for funding include housing rehabilitation, public infrastructure improvements, public social services, and program administration, including fair housing services.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	JURUPA VALLEY	Development Services

Table 1 – Responsible Agencies

### Narrative (optional)

The City Development Services Department is primarily responsible for the preparation of the Consolidated Plan and for administration of CDBG funds.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Jurupa Valley has taken several steps to obtain the input of community residents and stakeholders to develop the 2019-2020 Annual Action Plan. Consultation efforts include community meetings, and public notices and hearings. The City also consulted with state and regional agencies and local service providers. Additionally, the City utilized its internet webpage, social media, and the local community newspaper to notify residents of the opportunity to review and comment on the draft 2019-2020 Annual Action Plan. Actions taken by the City are consistent with the City's Citizen Participation Plan which is incorporated into the Consolidated Plan.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

Jurupa Valley's recently updated Housing Element emphasizes incentives rather regulations, "as a means to facilitate the production of housing for all income levels." Implementation of incentive programs will require significant coordination with housing developers and housing providers. Among assisted housing providers, Jurupa Valley partners with the Housing Authority of the County of Riverside (HACR), which assists renter households with HUD-funded housing assistance vouchers and certificates.

With respect to service agencies, the City actively reached out to local homeless service providers to explore partnership and funding opportunities. Through the annual CDBG Public Service Grants funding process, City staff can ascertain the services City residents need and develop partnerships with local agencies to coordinate the delivery of needed services.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

As a "Participating City" in the Urban County CDBG program, Jurupa Valley contributed to the Riverside County Continuum of Care (RC-CoC) planning process through the County of Riverside. As a direct CDBG grantee, the City will continue to participate in the RC-CoC by contributing to the regional CoC planning process. Additionally, the City initiated the process to build relationships with local CoC service providers in order to address the needs of the City's homeless. As needed, City staff will expedite certifications of consistency with the Consolidated Plan and other forms of support for the OC CoC. The City also participated in the 2019 regional homeless Point-In-Time survey.

### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate**

**outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City is not a recipient of Emergency Solutions Grant (ESG) funds; therefore, it does not assist the RC-CoC with the determination of ESG allocations or evaluating outcomes, and developing policies and procedures for the administration of the regional Homeless Management Information System (HMIS). In order to address local homeless issues, the City did solicit proposals from regional service providers and considered how these programs and services address local and regional homeless needs.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities (see Table 2)**

**Table 2 – Agencies, groups, organizations who participated**

<b>1</b>	<b>Agency/Group/Organization</b>	Riverside County Fair Housing Council
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Impediments to Fair Housing Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency provided data and information that helped identify the needs of households requiring fair housing services. Also provided input regarding the region's strategy to address impediments to fair housing.
<b>2</b>	<b>Agency/Group/Organization</b>	County of Riverside Department of Public Social Services
	<b>Agency/Group/Organization Type</b>	Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth HMIS
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regional Continuum of Care coordinator and HMIS administrator. Provided significant information regarding regional and City homeless population and resources.
<b>3</b>	<b>Agency/Group/Organization</b>	Housing Authority of the County of Riverside
	<b>Agency/Group/Organization Type</b>	Public Housing Authority
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided information regarding number and type of households receiving rental assistance and the number of households requesting housing assistance.
4	<b>Agency/Group/Organization</b>	Family Services Association
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency helped identify needs of senior and frail elderly persons and households.
5	<b>Agency/Group/Organization</b>	City of Jurupa Valley
	<b>Agency/Group/Organization Type</b>	Other government – Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City departments and City Council provided data and information, identified priorities, and recommendations for the allocation of HUD funds.
6	<b>Agency/Group/Organization</b>	Path of Life
	<b>Agency/Group/Organization Type</b>	Services-Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency helped identify needs of local homeless and households at risk of homelessness.
7	<b>Agency/Group/Organization</b>	211 Community Connect
	<b>Agency/Group/Organization Type</b>	Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data regarding various community social service needs.
8	<b>Agency/Group/Organization</b>	Social Work Action Group
	<b>Agency/Group/Organization Type</b>	Services-Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency helped identify needs of local chronic homeless.
9	<b>Agency/Group/Organization</b>	Environmental Protection Agency Region 9
	<b>Agency/Group/Organization Type</b>	Other government – Federal
	<b>What section of the Plan was addressed by Consultation?</b>	HazMat Planning
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency developed a Community Involvement Plan to encourage and facilitate community engagement throughout the Stringfellow Superfund Site cleanup.

**Identify any Agency Types not consulted and provide rationale for not consulting**

The City had an open consultation process; no agency was prevented or excluded from participating.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	County of Riverside Department of Public Social Services	Regional and local Point-In-Time Survey (including Plan to End Homelessness and discharge planning)
Jurupa Valley Draft 2017 General Plan	City of Jurupa Valley	Housing priorities and program goals, and natural hazards resilience planning
City of Jurupa Valley Annual Budget	City of Jurupa Valley	City budget document including capital improvements that may be CDBG-eligible
5 Yr & 1 Yr PHA Plan	Housing Authority of the County of Riverside (HACR)	Resources to address housing needs of lower income renter householders
Fair Housing Impediments Study	County of Riverside	Multi-jurisdictional document identified fair housing impediments within participating cities and outlined plan to address
Stringfellow Superfund Site Community Involvement Plan	Environmental Protection Agency Region 9	Community involvement plan to encourage and facilitate community engagement throughout the Stringfellow Superfund Site cleanup process

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal-setting**

The City implemented the following efforts to obtain a broad range of resident input during the preparation of the 2019-20 Annual Action Plan:

**Community Meetings:** On February 21, 2019, the City Council established the Community Development Advisory Committee (CDAC), a five-member committee of City resident charged with evaluating and recommending public service grant for the Council’s consideration. On February 22, 2019, an informal meeting was held by the City to advise potential committee members and public service grant applicants of the upcoming committee appointment and grant application process. On March 22, 2019, the newly-appointed CDAC held its first meeting at which grant applicants presented their request for public service grant funding and the Committee accepted additional public input regarding CDBG public service grant funding. Finally, on March 28, 2019, the CDAC meet for a second time to hear additional public input regarding CDBG public service grant funding. The Committee also developed funding recommendations for the City Council’s consideration.

**Notices/Website:** On April 2, 2019, a notice was published in the *Press Enterprise* announcing the required 30-day public comment period for the draft 2019-2020 Annual Action Plan. The notice also announced 2019-2020 public hearing to be held by the City Council. See **Attachment 1**, for a copy of the notice and a summary of public comments.

**Public Hearings:** Consistent with HUD’s regulations, the City Council held a public hearing at a regularly noticed and scheduled meeting (May 2, 2019) to obtain public input regarding the draft Annual Action Plan and the proposed use of 2019-20 CDBG funds, and to authorize staff to submit the document to HUD.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	Residents, committee members, local service providers, city staff and community development consultants	Input regarding community service needs.	None	NA
2	Public Meeting	Non-targeted/broad community	Residents, committee members, local service providers, city staff and community development consultants	Input regarding community service needs.	None	NA
3	Newspaper Ad	Non-targeted/broad community	30-day public comment period and public hearing notice	None	NA	NA
4	Public Hearing	Non-targeted/broad community	5/2/19 public hearing to approve 2019-20 Action Plan and to authorize submission of the plans to HUD	None	NA	NA

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

Fluctuations in CDBG funding make it difficult to estimate the amount that will be available over the five-year Consolidated Plan cycle. The 2019 federal budget was approved on February 15, 2019. On April 12, 2019, HUD published 2019 CDBG allocations - the City will receive \$1,203,797 in CDBG funds for FY 2019-20. Housing voucher/certificate resources (via HARC) will be available to carry out activities that support the goals of the Consolidated Plan.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public – federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,203,797	0	0	1,203,797	3,000,000	Annual CDBG allocation

**Table 5 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Other resources that are available to carry out activities that address the goals of the Consolidated Plan are limited:

- HARC reports that as of March 2019, 365 Jurupa Valley households receive rental assistance. It is anticipated that a similar number of households will be assisted annually over the five-year period of the Consolidated Plan.
- Jurupa Valley intends to continue and update an existing Inclusionary Housing Program previously administered by the County of Riverside. This program requires that 1 out of every 25 new units (4%) be reserved for households at the 50% area median income level. Projects of six or more units are required to participate in the program. Affordable units must be provided on-site, off-site, or through the payment of an in-lieu fee.

CDBG does not require matching funds.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The Jurupa Valley General Plan Appendix A contains an extensive list of parcels that may be suitable for housing development. The inventory includes an evaluation of development constraints and potential development capacity for each parcel. Combined with the incentives identified in the Housing Element, there exists a potential for the development of several affordable housing units during the Consolidated Plan cycle; however, no specific projects are identified for FY 2019-20.

**Discussion**

Funding resources to implement the City's Consolidated Plan are limited. It is anticipated that CDBG funding will continue to be reduced. With respect to other resources, the City will continue to support RCHA's efforts to secure new rental assistance resources. Finally, an inventory of vacant and underutilized land has been developed. Combined with affordable housing development incentives, it is possible that new affordable housing opportunities will be developed during the Consolidated Plan cycle; however, no specific projects are identified for FY 2019-20.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Infrastructure Improvements	2019	2020	Non-Housing Community Development	CDBG Eligible Block Groups	Public Improvements	CDBG: \$780,697	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 11,225 Persons Assisted
2	Single Family Housing Rehabilitation	2019	2020	Affordable Housing	Citywide	Housing Rehabilitation	CDBG: \$65,000	Homeowner Housing Rehabilitated: 5 Household Housing Unit
3	Homeless Services	2019	2020	Public Services	Citywide	Homeless Services	CDBG: \$135,000	Public service activities other than Low/Moderate Income Housing Benefit: 90 Persons Assisted (Outreach) Homeless Person Overnight Shelter: 50 (Emergency Shelter) Persons Assisted Homelessness Prevention: 10 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Services	2019	2020	Public Services	Citywide	Public Services	CDBG: \$40,000	Public service activities other than Low/Moderate Income Housing Benefit: 275 Persons Assisted
6	Fair Housing Services	2019	2020	Administration	Citywide	Administration	CDBG: \$25,000	Other: 200 Other
7	Program Administration	2019	2020	Administration	Citywide	Administration	CDBG: \$158,100	Other: 1 Other

**Table 6 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	Public Infrastructure Improvements
	<b>Goal Description</b>	Improvements to roadways, streets, sidewalks, and other eligible public infrastructure that primarily benefit low- and moderate-income persons.
2	<b>Goal Name</b>	Single Family Housing Rehabilitation
	<b>Goal Description</b>	Rehabilitation or preservation of residential properties to address housing and building code deficiencies and deferred property improvements
3	<b>Goal Name</b>	Homeless Services
	<b>Goal Description</b>	Homeless housing and support services, including homelessness prevention services
4	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Social service programs that provide support services to low- and moderate-income residents
5	<b>Goal Name</b>	Fair Housing Services

	<b>Goal Description</b>	Services to address impediments to access fair housing
<b>6</b>	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	CDBG program oversight and coordination

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)**

The City is not a participating jurisdiction in HUD's HOME program.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The following activities have been allocated CDBG funds for Fiscal Year 2019-20. It is important to note that funding for most activities listed for FY 2019-20 CDBG funding have been proportionally increased from estimated planning funding levels to match the City's actual allocation.

#### Projects

#	Project Name
1	Pavement Rehabilitation Various Locations
2	Pacific Ave Sidewalk Project
3	Owner-Occupied Housing Rehabilitation Grants
4	Housing Rehabilitation Administration
5	Path of Life
6	Family Services Association
7	Fair Housing Council
8	CDBG Program Administration

Table 7 - Project Information

#### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

FY 2019-20 is the second year the City will administer CDBG funds on its own. As a Cooperating City in the CDBG Urban County Program, the City worked with Riverside County staff to implement several Americans with Disabilities Act (ADA) related projects, public facility improvement projects, and public services. The City will continue to utilize CDBG funds to construct street and sidewalk improvements to improve accessibility and mobility for individuals with disabilities and to improve neighborhoods within the CDBG eligible Census Tract Block Groups.

In addition to funding services to address the needs of the homeless and those at risk of becoming homeless, public service grants funding in 2019-20 includes funding for senior services. Fair housing services will provide residents, landlords, and property managers with information and knowledge regarding fair housing laws with the goal of reducing or eliminating housing discrimination. This program will benefit all Jurupa Valley residents including protected classes such as individuals with disabilities and families with children. Finally, as indicated in the Consolidated Plan, the City will implement a housing rehabilitation program for qualified low- and moderate-income homeowners.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	<b>Pavement Rehabilitation – Various Locations</b>
	<b>Target Area</b>	CDBG-Eligible Block Groups
	<b>Goals Supported</b>	Public Infrastructure Improvements
	<b>Needs Addressed</b>	Public Improvements
	<b>Funding</b>	CDBG: \$678,697
	<b>Description</b>	Street pavement rehabilitation
	<b>Target Date</b>	06/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3,770 residents of which 2,230 are low and moderate-income (59.15% Low/Mod)
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• 34<sup>th</sup> St – Avalon to Rubidoux</li> <li>• 36<sup>th</sup> St – Pioneer to Rubidoux</li> <li>• Arbuckle School Rd – Rubidoux to E End</li> <li>• Paula St – W Cul de Sac to Pontiac</li> <li>• Pioneer Dr – Mission to 34th</li> <li>• Pontiac Ave – Mission to N Cul de Sac</li> <li>• Raye St – Avalon to Pontiac</li> </ul> <p>Census Tract: 402.04 Block Group: 1 and 2</p>
	<b>Planned Activities</b>	Project entails rehabilitation of approximately 185,000 square feet of Asphalt Concrete (AC) pavement by primarily, but not limited to, partial reconstruction, grinding of existing AC pavement, sealing existing cracks, placing an AC overlay, replacement of AC berm where necessary, and installing striping, markings and pavement markers.

<b>2</b>	<b>Project Name</b>	<b>Pacific Ave Sidewalk Project</b>
	<b>Target Area</b>	CDBG-Eligible Block Groups
	<b>Goals Supported</b>	Public Infrastructure Improvements
	<b>Needs Addressed</b>	Public Improvements
	<b>Funding</b>	CDBG: \$102,000
	<b>Description</b>	Installation or modification of sidewalks, walkways and bike lanes to improve pedestrian safety.
	<b>Target Date</b>	06/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	7,855 residents of which 4,205 are low and moderate-income (53.33% Low/Mod)
	<b>Location Description</b>	Pacific Ave from 45 <sup>th</sup> Street to Mission Blvd - Census Tract: 403.01 Block Group: 1, 2, 3 and 4
	<b>Planned Activities</b>	Installation or modification of sidewalks, walkways and bike lanes to improve pedestrian safety.
<b>3</b>	<b>Project Name</b>	<b>Owner-Occupied Housing Rehabilitation Grants</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Single Family Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Pilot program: CDBG-funded grants for qualified homeowners to undertake home improvements to address code deficiencies and deferred property improvements
	<b>Target Date</b>	06/30/2020
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 lower income homeowners	

	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Grants up to \$10,000 to improve owner-occupied housing units.
<b>4</b>	<b>Project Name</b>	<b>Housing Rehabilitation Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Single Family Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$15,000
	<b>Description</b>	Funding for direct cost associated with the administration of the City's housing rehabilitation grant program
	<b>Target Date</b>	06/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 lower income homeowners
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Costs associated with the administration of the City's housing rehabilitation grant program. Tasks include qualifying property owners, inspecting properties for eligible home improvements, developing costs estimates, assisting homeowners with contractor agreement, and monitoring construction
<b>5</b>	<b>Project Name</b>	<b>Path of Life</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$135,000
	<b>Description</b>	Homelessness prevention, outreach, emergency shelter and support services.

	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 individuals (90 outreach, 10 prevention, and 50 emergency shelter)
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Homeless outreach and engagement in order to link individuals to housing and support services. Funding also allocated to provide direct financial assistance to prevent the loss of housing and to assist those already homeless.
<b>6</b>	<b>Project Name</b>	<b>Family Services Association</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Social service programs that provide support services to low- and moderate-income residents
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$40,000
	<b>Description</b>	Congregate meal program for seniors offered at the senior center
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	275 seniors
	<b>Location Description</b>	Program offered citywide but will be provided at the Eddie D. Smith Senior Center located at 5888 Mission Blvd.
	<b>Planned Activities</b>	Congregate meal program for seniors
<b>7</b>	<b>Project Name</b>	<b>Fair Housing Council of Riverside County</b>
	<b>Target Area</b>	Citywide

	<b>Goals Supported</b>	Fair Housing Services
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$25,000
	<b>Description</b>	Fair housing outreach, education and enforcement services with the goal to reduce and eliminate impediments to the fair access of housing.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	200 households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Fair housing outreach, education and enforcement services including; landlord, tenant and property management fair housing training; community outreach and education; complaint investigation and enforcement services.
<b>8</b>	<b>Project Name</b>	<b>CDBG Program Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$158,100 (13.1% of 2019 grant allocation)
	<b>Description</b>	CDBG program oversight and coordination.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable

<b>Location Description</b>	8930 Limonite Avenue, Jurupa Valley, CA – City Hall
<b>Planned Activities</b>	Program oversight and coordination including management of public service grants, housing and commercial rehabilitation programs, and preparation of required applications and reports.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Approximately 40 percent of planned CDBG-expenditures during FY 2019-20 will be available on a citywide basis. These activities include housing rehabilitation, homeless services, public services, fair housing services, and program administration. Public infrastructure improvement slated for funding are eligible due to the percentage of low- and moderate-income residents residing in the project’s service area. A map of the City’s CDBG Eligible Areas is provided as **Attachment 2**.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
CDBG-Eligible Block Groups	65
Citywide	35

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City’s primary intent is to serve lower income residents that need housing/services regardless of where they live within the City. Area-wide activities (e.g., infrastructure improvements) are limited to the City’s CDBG-eligible areas.

### **Discussion**

As indicated above, CDBG funds will be allocated to programs that serve Jurupa Valley residents regardless of where they live.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City will utilize limited CDBG funds and program income to provide housing rehabilitation grants to eligible homeowners.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	5
Special-Needs	0
<b>Total</b>	<b>5</b>

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
<b>Total</b>	<b>5</b>

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

During FY 2019-20, the City will implement a pilot Homeowner Housing Rehabilitation Grant program. The City will use CDBG funds to assist an estimated five households with this activity. The City will also continue to support HARC’s implementation of the federal rental assistance voucher and certificate program. An estimated 365 Jurupa Valley households will benefit from this program during FY 2019-20.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City does not own or manage public housing.

### **Actions planned during the next year to address the needs to public housing**

Not applicable.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Not applicable.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable.

### **Discussion**

The City does not own or manage public housing.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

As outlined in the Strategic Plan, the City will utilize a portion of CDBG funds during FY 2019-20 to support agencies that provide homeless services.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including;**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City will utilize CDBG funds to fund homeless outreach services specifically targeting chronic homeless individuals. These services will be provided by Path of Life Ministries, which will utilize its mobile outreach team to connect with 90 homeless individuals and provide a variety of services and referrals designed to meet the basic needs. This outreach staff will also conduct vulnerability assessments to determine if homeless individuals are ready to enter rapid rehousing or permanent supportive housing.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

There are no emergency or transitional housing beds in Jurupa Valley; however, during FY 2019-20, the City will partner with Path of Life which will provide a minimum of two shelter beds (600 bed nights) for Jurupa Valley homeless individuals on any given night. An estimated 50 individuals will benefit from these services.

#### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

HUD's 2017 *Continuum of Care Homeless Assistance Programs Housing Inventory Count Report* indicates there are 1,520 permanent supportive housing beds throughout the Riverside County Continuum of Care. Most beds (890) are tied to the Veterans Affairs Supportive Housing (VASH) rental housing voucher program that is administered by the HARC. The HARC reports 20 Jurupa Valley veteran households receive rental assistance and 57 are on the rental assistance waitlist. HARC also reports that as of March 7, 2019, 20 formerly homeless households are participating in the federal rental assistance program; however, 354 self-reported homeless individuals with ties to Jurupa Valley are on the waitlist for federal rental assistance. The City will continue to support HARC and its efforts to secure additional

VASH vouchers, Shelter Plus Care vouchers, and rental assistance vouchers and certificates in an effort to address the needs of these homeless individuals and households.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

According to HUD's *Strategies for Preventing Homelessness*, "Homelessness prevention is an essential element of any effort to end homelessness either locally or nationwide." This HUD report indicates it is less expensive and disruptive to keep a household housed in place. To this end, the City will allocate CDBG funds to Path of Life to support their homelessness prevention program. An estimated 10 individuals will be assisted during FY 2019-20. The City will also participate in regional homeless planning efforts, including the RC-CoC's Discharge Plan, which aims to prevent individuals leaving institutions, hospitals, etc., from becoming homeless.

## **Discussion**

The City's homeless strategy is to help prevent homelessness and to support local service providers as they engage and assess the City's homeless. Significant CDBG funding is allocated to Path of Life Ministries to provide an array of homeless services including outreach, engagement, short-term shelter, and support services. Path of Life will also use CDBG funding to provide rent and/or utility assistance to prevent eviction or the termination of utilities.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Barriers to affordable housing and actions to overcome barriers are listed in the City’s Housing Element and were outlined in the Consolidated Plan – a summary is provided below.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The Jurupa Valley Housing Element states, “incentives are preferable to regulations as the means to facilitate the production of housing for all income levels.” To encourage the production of lower-cost housing the City has identified various incentives for property owners and developers to consider. Among these possible incentives are modifications to development standards, reduced development fees, expedited permit processing, and direct financial assistance from in-lieu Inclusionary Housing Program (IHP) fees. No projects are currently underway that are utilizing these incentives.

### **Discussion:**

The City’s Housing Element and Consolidated Plan identify several barriers to the creation of affordable housing opportunities. The Housing Element has also identified several actions the City can take to reduce the impact of these barriers on the development of affordable housing; however, no projects are currently under development that are using these incentives.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Outlined below are the actions the City will implement during FY 2019-20 to address the sub-strategies of the Strategic Plan.

### **Actions planned to address obstacles to meeting underserved needs**

During FY 2019-20, the City will encourage and support HARC's efforts to obtain additional rental assistance funding, especially for senior, disabled, and low-income households. CDBG-funded public facility improvements will provide improve residential neighborhoods with the rehabilitation or installation of streets, sidewalks and bike lanes. Additionally, funding will be allocated to support meal services for seniors. Finally, fair housing services will help ensure all households can secure safe and decent housing that they desire and can afford, without regard to their race, color, religion, gender, national origin, familial status, disability, age, source of income or other characteristics protected by laws.

### **Actions planned to foster and maintain affordable housing**

As previously outlined, the City will utilize CDBG funds to initiate a homeowner housing rehabilitation grant program during FY 2019-20. The City will also continue to support HARC's administration of HUD's voucher and certificate rental assistance program.

### **Actions planned to reduce lead-based paint hazards**

A significant percentage of the City's housing stock was constructed before 1980 and may contain lead-based paint hazards. The City will ensure that information is available to community residents regarding the health impacts of lead-based hazards, especially for young children. As the City implements its housing rehabilitation program, it will ensure that HUD's regulations regarding lead-based paint hazards are incorporated into program policies and procedures to ensure lead-paint hazards are addressed during the property rehabilitation.

### **Actions planned to reduce the number of poverty-level families**

According to the U. S. Census Bureau, approximately 16.0% of the City's population is living at or below the poverty level including 23.2% of children under the age of 18 and 13.8% of seniors (age 65 and older). During FY 2019-20 the City will support several activities that aim to reduce the number of households living in poverty:

- Support HARC's administration of rental assistance programs for very low-income renters.
- Support social service programs that assist households at risk of becoming homeless and those that are homeless.

- Funding for free/low-cost meal services for seniors.
- Support fair housing services to ensure households have access to safe and decent housing free of discrimination.

### **Actions planned to develop institutional structure**

As the City prepared to become a CDBG grantee community in 2018, it initiated efforts to develop an institutional structure that will help identify and access resources to improve the community. The City solicited the input of local service providers by a community workshop to discuss community needs and future funding opportunities. The City will continue to assist the HARC to implement its Five-year Public Housing Authority (PHA) Plan for the provision of rental assistance vouchers and certificates. The City will also engage neighboring HUD-grantee communities to explore and participate in regional planning and program initiatives.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City of Jurupa Valley does not operate public housing. HARC provides rental assistance in the community. Federal legislation requires that the Housing Authority prepare five-year and one-year plans that highlight its mission, goals, and objectives as it relates to public and assisted housing programs. The City will review the Authority's plans and will provide HARC the opportunity to review and consult with the City regarding its Consolidated Plan. The goal of this cross-consultation is to provide consistent and coordinated housing services for City residents.

As stated above, Jurupa Valley has developed working relationships with several local nonprofits. As the City expands its CDBG program to provide public service grant funding, it will coordinate efforts with nonprofit partners to promote the efficient and effective use of limited public resources.

### **Discussion:**

Prior to 2018, the City was part of the Riverside Urban County CDBG program. As a participating jurisdiction, the County's Analysis of Impediments to Fair Housing incorporated the City. The current AI is summarized in **Attachment 3**. Action steps to be taken by the City during FY 2019-20 to address identified impediments are also found in **Attachment 3**.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

Each HUD program that is covered by the Consolidated Plan regulations must address certain program specific requirements.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### Discussion

The City will meet the overall 70% benefit for low and moderate-income requirement during the one-year **2019** Program Year.

**PUBLIC NOTICE  
NOTICE OF 30-DAY PUBLIC COMMENT PERIOD  
AND PUBLIC HEARING TO BE HELD BY THE  
CITY OF JURUPA VALLEY  
REGARDING SUBMISSION OF THE 2019-2020 ANNUAL ACTION PLAN**

NOTICE IS HEREBY GIVEN that the City of Jurupa Valley City Council will hold a public hearing and public comment period for the Action Plan for Fiscal Year 2019-2020. This action is taken in compliance with federal regulations [24 CFR 91].

As a recipient of Community Development Block Grant (CDBG) funds, the City is required to approve an Annual Action Plan every year. The Action Plan delineates proposed activities to be funded under the U.S. Department of Housing and Urban Development's (HUD) CDBG program.

**30-Day Public Comment Period**

The required 30-day public comment period for the 2019-2020 Annual Action Plan will commence April 1, 2019 and will end May 2, 2019. The draft document will be available for public review upon request at the public counter at Jurupa Valley City Hall – 8930 Limonite Avenue, Jurupa Valley, CA 92509. City Hall is open Monday through Friday, 8 AM to 5 PM. The draft will also be posted on the City's website ([www.jurupavalley.org](http://www.jurupavalley.org)). Written comments regarding the draft Annual Action Plan may be submitted to the attention of Sean McGovern at the City Hall address. All written comments must be received by the City no later than 12 PM May 2, 2019.

**2019-2020 Action Plan**

HUD has not notified the City of its final CDBG allocation for 2019; however, for planning purposes, it is anticipated the City will receive an allocation of \$1,180,000 in CDBG funds for Fiscal Year 2019-2020. Consistent with HUD's guidelines, once the 2019-2020 CDBG grant is announced by HUD, staff will adjust the proposed allocations listed below by a uniform percentage based on the final grant amount and taking into consideration any conditions set by the City Council. The proposed use of CDBG funds includes the following:

<b>Proposed Activity</b>	<b>Proposed CDBG Allocation</b>
• Public services for lower income persons	\$175,000
• Public facility and/or infrastructure improvements	\$760,000
• Program administration (including Fair Housing counseling)	\$180,000
• Housing Rehabilitation Pilot Program	\$65,000

**2019-2020 Action Plan Public Hearing**

The City is also required to hold a public hearing to obtain additional public comments regarding the 2019-2020 Annual Action Plan. Notice is hereby given that the City of Jurupa Valley City Council will hold a public hearing on Thursday, May 2, 2019, for this purpose. The hearing will be held in the City Council Chambers located at 8930 Limonite Avenue, Jurupa Valley. The City Council meeting will be held at 7 PM or soon thereafter. For additional information regarding the hearing (including reasonable requests for special accommodations for persons with disabilities), please contact Sean McGovern at (951) 332-6464 Ext. 249.

If you wish to challenge the City's decision in court, the challenge will be limited only to those issues you or someone else raised at the public hearing, prior to the public hearing, or in written correspondence delivered to the City Clerk's Department, prior to, the public hearing described in this notice.

The agenda report for this item will be available on Monday, April 29, 2019 on the City's website at [www.jurupavalley.org](http://www.jurupavalley.org). Additionally, a copy of the report may be obtained at City Hall during normal business hours, Monday through Friday, 8:00 a.m. – 5:00 p.m. It is recommended that you contact City Hall to ensure a copy of the report is available for distribution. For further information you may wish to call City Hall at (951) 332-6464.

Publish: April 1, 2019

## **SUMMARY OF PUBLIC COMMENTS**

### **FEBRUARY 22, 2019 & MARCH 28, 2019 COMMUNITY DEVELOPMENT ADVISORY COMMITTEE MEETINGS**

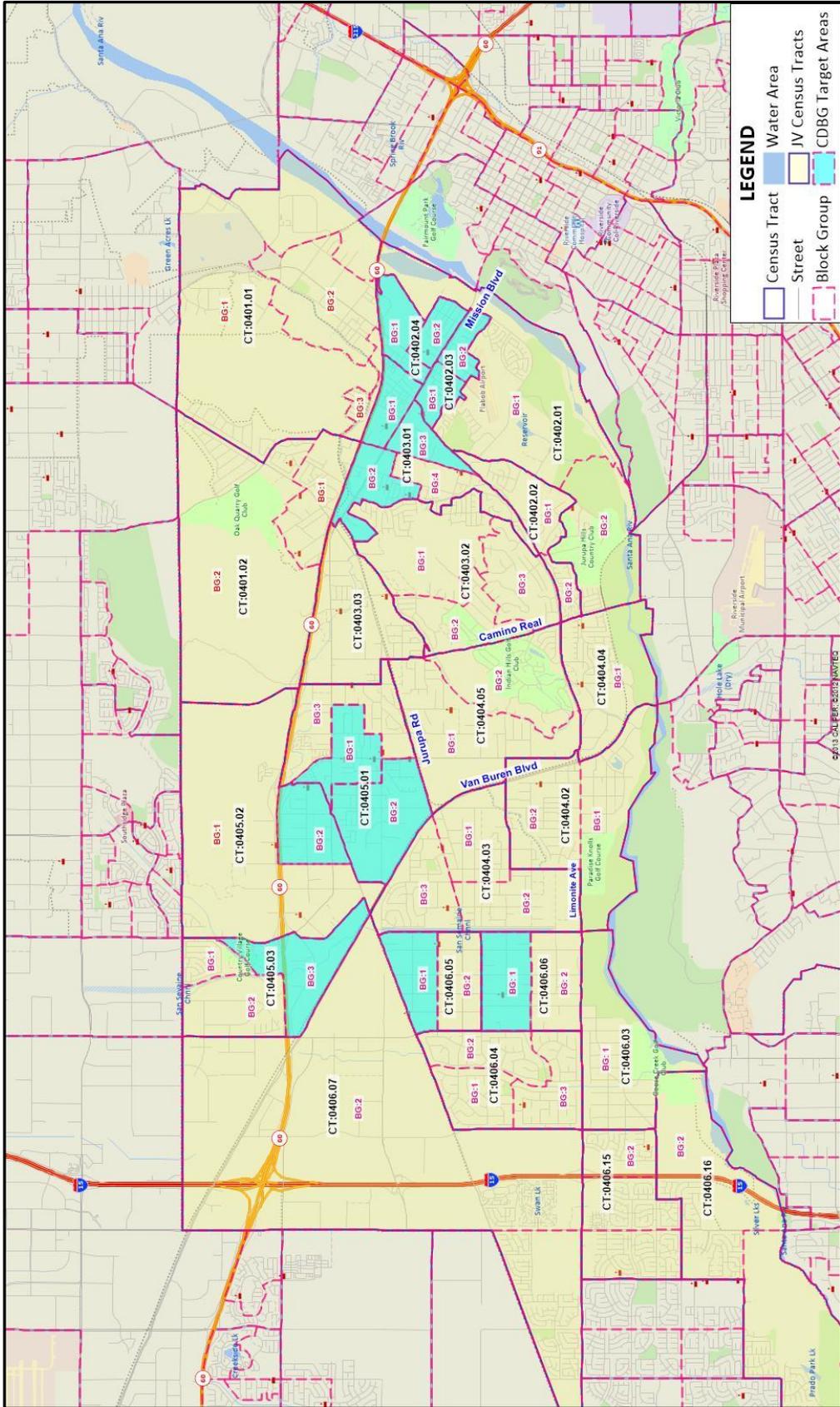
During the first Committee meeting three of four public service grant applicants provided Committee members with a summary of their respective applications. At the second meeting, Committee members asked applicants questions. The Committee then made their funding recommendations for the City Council's consideration. No public comments were received during either meeting.

### **SUMMARY OF 30-DAY PERIOD PUBLIC COMMENTS**

No public comments were received during the public comment period.

### **SUMMARY OF PUBLIC HEARING COMMENTS**

No public comments were received during the public hearing.



**COUNTY OF RIVERSIDE**  
**2014-2018 FAIR HOUSING IMPEDIMENTS STUDY**  
**(Summary)**

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

The Fair Housing Council of Riverside County (FHCRC) has been contracted by the County to provide fair housing services for the unincorporated areas as well as the County's CDBG Cooperating Cities.

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

- A. Affordable Housing: The recent economic crisis has contributed to the increasing need for additional affordable rental housing. As individual income decreased due to the economy, so did the ability to afford decent housing. One of the biggest problems facing low income individuals is the gap between what they can afford to pay for housing and the actual cost of that housing. Based on the current fair market rent for rental properties and the fact that 43.3% of household earn less than \$50,000 per year, the affordability of rental housing is a major issue in Riverside County.
- B. Lack of Available Housing: For very low-income and extremely low-income renters, the market for affordable housing is the worst in 25 years. One of the main causes of this situation is the overall inadequate pool of housing available. According to an annual report by the National Low Income Housing Coalition (NLIHC), titled Out of Reach, for every 100 extremely low-income renters in California, only 38 affordable units exist. Housing shortages increase the probability of housing discrimination by creating competition that can be used to disguise unlawful discrimination practices.
- C. Disabilities: Impediments to Fair Housing for Individuals with disabilities are finding housing that meets their specific criteria, having full use and enjoyment of their current dwelling, and housing discrimination. Thankfully, privately owned and publicly assisted housing must meet the accessibility requirements of the Fair Housing Act. Still, only buildings of four or more units built after March 13, 1991 are subject to these requirements.
- D. Advertising: Potential renters most often begin their search for a home from advertising material. Unfortunately, the language used is often improper and even the use of models may indicate a preference and can be a potential problem. Advertising a "no pets" policy can also be an impediment to Fair Housing if the housing provider is not aware that a service or companion animal is not a pet.

- E. Viewing the Unit: One of the most common discrimination that a potential renter may encounter is when viewing the unit. Housing providers may make a judgment based on one's race, disability, familial status or other characteristic when determining qualifications. In some cases, potential renters are quoted different terms and conditions than other potential renters because of the housing provider's discriminatory actions.
- F. Credit Check: Potential renters may be asked to produce documentation regarding credit history, current and previous addresses and landlords, as well as employment history/salary. Qualifications criterion for tenant selection, if any, are usually not known to those seeking to rent. Although housing providers may set qualification guidelines that screen potential tenants, in many instances poor credit or rental history is used as a reason for denial as a way to exclude certain protected classes.
- G. Leasing Issues: Standard leases or rental agreements include information regarding the monthly rental rate, required deposit, length of occupancy, community/house rules, and termination requirements. Most leases and rental agreements are standard for all units within the same community. The enforcement of the rules in the lease or rental agreement, however, may not be uniform for all tenants. Housing providers may choose strict enforcement of the rules for certain tenants based on discriminatory factors, such as familial status, race or disability, as well as arbitrary factors such as tattoos or body piercing. Since the recent escalation of housing prices throughout California, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased. In a lucrative housing market, one potential impediment to Fair Housing is that some housing providers favor shorter lease terms like month-to-month leases. It allows the housing provider to forego a waiting period to increase rents and sometimes increasing rent is a way to push out tenants that they consider undesirable. Lastly, the security deposit can also serve as an impediment. To deter what a landlord perceives as less desirable tenants, the landlord may ask for a deposit higher than for others.
- H. Steering: When Caucasian purchasers are discouraged from neighborhoods of color, while African American purchasers are steered toward those same neighborhoods, there is a clear violation of the Federal Fair Housing Act. Sometimes real estate agents steer by limiting the location of homes they show buyers. In other cases, real estate agents steer by making comments and editorializing about communities and neighborhoods. This type of activity by those working in the real estate industry presents a clear impediment to fair housing choice.
- I. Habitability: The California Supreme Court has recognized that every residential lease carries with it an implied warranty of habitability. California Civil Code §1942 gives a tenant two options if the premises are uninhabitable: repair the problems and deduct the cost from the rent or move out. This creates a situation where although the remedies of "repair and deduct" or "move out" are great on paper, yet in practice they are too risky for tenants to truly benefit from them. This creates an impediment to Fair Housing because tenants then come to accept the substandard living conditions as unavoidable. Low income families are often the most impacted by substandard living conditions, which makes the need to address this impediment to Fair Housing all the more important.

- J. Constructive Evictions: Another impediment to Fair Housing that is related to habitability is the constructive eviction. A constructive eviction occurs when a landlord takes actions that interfere with the tenant's use and enjoyment of the premises in a significant way. Some of the tactics that landlords engage in that may result in a constructive eviction are cutting off the tenant's utilities or other essential services; harassing the tenant, whether verbally, physically, or emotionally; or blocking the tenant's access to the unit, such as changing the locks. Actions behind a constructive eviction are an attempt by the landlord to remove a lawful tenant without going through the proper unlawful detainer process.
  
- K. Predatory Lending: Predatory lending occurs when a variety of characteristics are present during the lending process or in the final mortgage loan itself. These characteristics include targeting specific groups for mortgage loans, unreasonable loan terms, and fraudulent behavior by the lender. Given the financial dangers associated with subprime loans, prepayments penalties, excessive fees, exaggerated incomes and abusively high rates, it is clear that discrimination found in the subprime market constitutes a grave threat to the financial well-being of America's already underserved populations. The Department of Housing and Urban Development (HUD) has noticed that homeowners in high-income African-American neighborhoods are 6 times more likely to have a subprime loan compared to homeowners in a high-income Caucasian neighborhood. Product steering is another form of predatory lending that occurs when the borrower will be offered a variety of loan options, but they will be persuaded to take the higher cost loan. This was often seen when lenders steered potential borrowers towards FHA loans, even though they could have qualified for a conventional loan. There are benefits to an FHA loan but statistics have shown that even with these benefits, an FHA loan will cost the borrower more money over the life of a loan than a conventional loan would.
  
- L. Other Lending / Sales Concerns: Other impediments to Fair Housing in the lending and sales market that do not involve predatory lending are differential treatment of minorities or low-income individuals in the lending process and real estate agents refusal to deal with transactions for properties valued less than \$100,000 or so. These are yet additional hurdles for low-income individuals and are impediments to Fair Housing that needs to be addressed.

## CONCLUSIONS AND RECOMMENDATIONS

The following paragraphs present conclusions regarding the extent of impediments to fair housing choice within Riverside County, along with recommendations for mitigating these impediments. The information presented herein is by no means comprehensive, and there undoubtedly remain a number of additional remedies to the problems faced by home seekers. Based on the impediment revealed in the FHCRC Audit, the following recommendations are suggested for Riverside County to continue the alleviation of impediments to fair housing:

- Audits should be conducted periodically to determine the nature, extent, and changes to housing discrimination throughout Riverside County. These audits should be focused on all protected classes under California law.
- Specific audits should be conducted on the new interpretations of the Unruh Act, which now covers gender identity and gender expression under the protected class of sex. Individuals who fall into these categories deserve the full protection of the law, but it is likely that many housing providers are discriminating on these protected bases.
- Further audits should also be conducted on the basis of disability. The topic of service and companion animals is still confusing for many housing providers, who continue to tell individuals that they cannot have a service or companion animal because of a “no pets” policy. This is blatantly discriminatory under Fair Housing laws, and further education and outreach is also needed to inform housing providers of the applicable law.
- In an effort to ensure that all potential renters are treated the same, owners of rental property should be encouraged to provide written documentation to all applicants. This documentation should include a listing of all available housing and also include standardized information on the terms and conditions of the rental process, such as income qualifications, down payments, and other fees or expenses.
- Provide workshops to the general public on the topics of budgeting and credit issues. This will increase the general public’s financial education and improve their living conditions. This also may help to boost the overall economy, as it is beneficial for the county when more individuals and families are in a stronger financial situation.
- Provide local non-profit organizations with support to market their services, as these services are critical to the sustained success of the community. If individuals have more awareness regarding the free services made available by local non-profits, they are more likely to take advantage of those services. In turn, when these free services are taken advantage of, it will benefit those individuals directly and also will benefit the community as a whole.
- In order to help all individuals understand and respect the diversity of cultures in Riverside County, more education, training, and outreach on Fair Housing laws and cultural sensitivity should be provided to tenants, managers, owners, and apartment owner associations.

- Develop and expand an educational program for housing providers, community organizations, and the general public regarding housing discrimination, Fair Housing laws, and the options available for individuals who have been the victims of discrimination.
- Continue homebuyer educational programs and ongoing education for participants in First- Time Homebuyer Programs, such as the program that FHCRC offers to the public.

## **ANALYSIS OF IMPEDIMENTS MATRIX**

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

**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.

  
\_\_\_\_\_  
Sign. of Authorized Official

05/06/2019  
Date

City Manager  
\_\_\_\_\_  
Title

## 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 [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

05/06/2019  
Date

City Manager  
\_\_\_\_\_  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

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

**Application for Federal Assistance SF-424**

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>
---	---	--

<b>* 3. Date Received:</b> <input type="text" value="05/06/2019"/>	<b>4. Applicant Identifier:</b> <input type="text"/>
---	---

<b>5a. Federal Entity Identifier:</b> <input type="text" value="B-19-MC-06-0607"/>	<b>5b. Federal Award Identifier:</b> <input type="text" value="B-19-MC-06-0607"/>
---	--

**State Use Only:**

<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>
--	--

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="45-2260785"/>	<b>* c. Organizational DUNS:</b> <input type="text" value="0533001930000"/>
---	--

**d. Address:**

<b>* Street1:</b>	<input type="text" value="8930 LIMONITE AVE."/>
<b>Street2:</b>	<input type="text"/>
<b>* City:</b>	<input type="text" value="JURUPA VALLEY"/>
<b>County/Parish:</b>	<input type="text" value="RIVERSIDE"/>
<b>* State:</b>	<input type="text" value="CA: California"/>
<b>Province:</b>	<input type="text"/>
<b>* Country:</b>	<input type="text" value="USA: UNITED STATES"/>
<b>* Zip / Postal Code:</b>	<input type="text" value="92509-5019"/>

**e. Organizational Unit:**

<b>Department Name:</b> <input type="text" value="CITY ADMINISTRATION"/>	<b>Division Name:</b> <input type="text"/>
---	---

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

<b>Prefix:</b> <input type="text" value="MR."/>	<b>* First Name:</b> <input type="text" value="SEAN"/>
<b>Middle Name:</b> <input type="text"/>	
<b>* Last Name:</b> <input type="text" value="MCGOVERN"/>	
<b>Suffix:</b> <input type="text"/>	

**Title:**

**Organizational Affiliation:**

<b>* Telephone Number:</b> <input type="text" value="(951) 332-6464 x249"/>	<b>Fax Number:</b> <input type="text" value="(951) 332-6995"/>
---	--

**\* Email:**

**Application for Federal Assistance SF-424**

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

HOUSING AND URBAN DEVELOPMENT

**11. Catalog of Federal Domestic Assistance Number:**

14-218

CFDA Title:

COMMUNITY DEVELOPMENT BLOCK GRANT

**\* 12. Funding Opportunity Number:**

NA

\* Title:

NA

**13. Competition Identification Number:**

NA

Title:

NA

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

Add Attachment

Delete Attachment

View Attachment

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

CDBG funds will be used to provide services to low- & moderate-income residents, public infrastructure improvements, housing rehab, and program administration.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,203,797.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,203,797.00"/>

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

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

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

- Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

\*\* I AGREE

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

**Authorized Representative:**

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

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

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

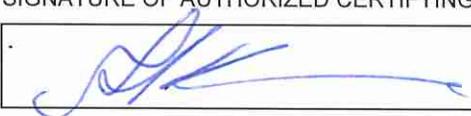
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE CITY MANAGER
APPLICANT ORGANIZATION CITY OF JURUPA VALLEY	DATE SUBMITTED 05/06/2019