



Western Riverside Council of Governments Executive Committee

AGENDA

Monday, August 1, 2022
2:00 PM

Western Riverside Council of Governments
3390 University Avenue, Suite 200
Riverside, CA 92501

[Join Zoom Meeting](#)

Meeting ID: 837 6338 6171

Password: 080122

Dial in: (669) 900 9128 U.S.

SPECIAL NOTICE – COVID-19 RELATED PROCEDURES IN EFFECT

Due to the State or local recommendations for social distancing resulting from the threat of Novel Coronavirus (COVID-19), this meeting is being held via Zoom under Assembly Bill (AB) 361 (Government Code Section 54953). Pursuant to AB 361, WRCOG does not need to make a physical location available for members of the public to observe a public meeting and offer public comment.

AB 361 allows WRCOG to hold Committee meetings via teleconferencing or other electronic means and allows for members of the public to observe and address the committee telephonically or electronically.

In addition to commenting at the Committee meeting, members of the public may also submit written comments before or during the meeting, prior to the close of public comment to snelson@wrcog.us.

Any member of the public requiring a reasonable accommodation to participate in this meeting in light of this announcement shall contact Suzy Nelson 72 hours prior to the meeting at (951) 405-6703 or snelson@wrcog.us. Later requests accommodated to the extent feasible.

The Committee may take any action on any item listed on the agenda, regardless of the Requested Action.

1. CALL TO ORDER (Crystal Ruiz, Chair)
2. PLEDGE OF ALLEGIANCE
3. ROLL CALL

4. PUBLIC COMMENTS

At this time members of the public can address the Committee regarding any items within the subject matter jurisdiction of the Committee that are not separately listed on this agenda. Members of the public will have an opportunity to speak on agenda items at the time the item is called for discussion. No action may be taken on items not listed on the agenda unless authorized by law. Whenever possible, lengthy testimony should be presented to the Committee in writing and only pertinent points presented orally.

5. CONSENT CALENDAR

All items listed under the Consent Calendar are considered to be routine and may be enacted by one motion. Prior to the motion to consider any action by the Committee, any public comments on any of the Consent Items will be heard. There will be no separate action unless members of the Committee request specific items be removed from the Consent Calendar.

A. Assembly Bill 361 Findings

Requested Action(s):

- 1. Affirm the findings of the Executive Committee in Resolution Number 01-22, adopted on April 4, 2022, which are:
 - a. The Governor proclaimed a State of Emergency on March 4, 2020, related to the COVID-19 pandemic, which State of Emergency continues to exist today; and
 - b. State or local officials have recommended measures to promote social distancing.

B. Summary Minutes from the July 11, 2022, Executive Committee Meeting

Requested Action(s):

- 1. Approve the Summary Minutes from the July 11, 2022, Executive Committee meeting.

C. Finance Department Activities Update

Requested Action(s):

- 1. Receive and file.

D. WRCOG Committees and Agency Activities Update

Requested Action(s):

- 1. Receive and file.

E. Report out of WRCOG Representatives on Various Committees

Requested Action(s):

- 1. Receive and file.

F. Legislative Activities Update

Requested Action(s):

- 1. Receive and file.

G. RHNA Reform Comment Letter

Requested Action(s):

- 1. Authorize WRCOG's Executive Director to submit the provided comment letter regarding future RHNA allocation methodologies to SCAG.

6. REPORTS / DISCUSSION

Members of the public will have an opportunity to speak on agenda items at the time the item is called for discussion.

A. Cal Cities Activities Update

Requested Action(s): 1. Receive and file.

B. PACE Programs Activities Update: Purchase and Sale Agreement with First National Assets

Requested Action(s):

1. Adopt Resolution Number 22-22; A Resolution of the Executive Committee of the Western Riverside Council of Governments approving a Purchase and Sale Agreement for the sale of Assessment Installment Receivables.
2. Authorize the Executive Director to enter into a Purchase and Sale Agreement, substantially as to form, with First National Assets for the purchase of delinquent assessment receivables.

C. Smart Streetlight Implementation Plan and Broadband Assessment

Requested Action(s):

1. Accept the Smart Streetlight Implementation Plan and Broadband Assessment.
2. Direct staff to implement Phase 1 of the Smart Streetlight Implementation Plan.
3. Direct staff to provide bi-monthly updates on broadband funding opportunities and convene meetings as needed to disseminate information on broadband-related funding opportunities.

7. REPORT FROM THE TECHNICAL ADVISORY COMMITTEE CHAIR
Rob Johnson, City of San Jacinto

8. REPORT FROM COMMITTEE REPRESENTATIVES
CALCOG, Brian Tisdale
SANDAG Borders Committee, Crystal Ruiz
SAWPA OWOW Committee, Ted Hoffman
SCAQMD, Ben Benoit
SCAG Regional Council and Policy Committee Representatives

9. REPORT FROM THE EXECUTIVE COMMITTEE CHAIR
Crystal Ruiz, City of San Jacinto

10. REPORT FROM THE EXECUTIVE DIRECTOR
Dr. Kurt Wilson

11. ITEMS FOR FUTURE AGENDAS
Members are invited to suggest additional items to be brought forward for discussion at future Committee meetings.

12. GENERAL ANNOUNCEMENTS
Members are invited to announce items / activities which may be of general interest to the Committee.

13. NEXT MEETING
The next Executive Committee meeting is scheduled for Monday, September 12, 2022, at 2:00 p.m., on the Zoom platform with the option for Committee members to attend in person.

14. CLOSED SESSION

CONFERENCE WITH LEGAL COUNSEL– ANTICIPATED LITIGATION

Significant exposure to litigation pursuant to Government Code Section 54956.9(2)(d): 1 Case (Koch)

15. ADJOURNMENT



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: Assembly Bill 361 Findings
Contact: Dr. Kurt Wilson, Executive Director, kwilson@wrcog.us, (951) 405-6701
Date: August 1, 2022

Requested Action(s):

1. Affirm the findings of the Executive Committee in Resolution Number 01-22, adopted on April 4, 2022, which are:
 - a. The Governor proclaimed a State of Emergency on March 4, 2020, related to the COVID-19 pandemic, which State of Emergency continues to exist today; and
 - b. State or local officials have recommended measures to promote social distancing.

Purpose:

The purpose of this item is to authorize virtual Committee meetings pursuant to Assembly Bill 361.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #4 - Communicate proactively about the role and activities of the Council of Governments and its members.

Background:

Since the onset of the COVID-19 in early 2020, California government agencies have been able to continue to discharge their legal responsibilities through the use of virtual teleconferencing platforms such as Zoom to hold public meetings that enabled agencies to meet and conduct business, comply with social distancing orders, and most importantly, provide access to the public. WRCOG has been meeting on Zoom since March of 2020, when many Executive Orders were issued by Governor Newsom in response to the pandemic. One such order altered Brown Act requirements to allow for virtual meetings.

Although transmission, hospitalization, and death rates from COVID-19 have sharply declined since the original onset of the pandemic and subsequent Delta and Omicron Variant surges, an air of uncertainty remains regarding the pandemic and many counties continue to recommend masking inside and social distancing. Given that environment and a desire to continue allowing for the flexibility of holding virtual meetings, the Legislature recently approved, and Governor Newsom signed, Assembly Bill 361 (AB 361) to temporarily allow for virtual meetings under proscribed circumstances.

AB 361 amends the Brown Act to allow local legislative bodies to continue using teleconferencing and virtual meeting technology in certain circumstances. Under the Bill, legislative bodies can continue to meet remotely as long as there is a "proclaimed state of emergency" and the Executive Committee can make either of the following findings: (a) state or local officials have imposed or recommended measures

to promote social distancing, or (b) whether as a result of the emergency, meeting in person would present imminent risks to the health or safety of attendees. Even though cases have dropped, AB 361 is expressly intended "to protect the health and safety of civil servants and the public and does not preference the experience of members of the public who might be able to attend a meeting in a physical location over members of the public who cannot travel or attend that meeting in a physical location" because of physical status.

The Governor proclaimed a State of Emergency on March 4, 2020, related to the COVID-19 pandemic, which continues to exist to this day.

AB 361 requires specific procedural safeguards for the public. To accommodate individuals during these teleconferences and virtual meetings, a public comment period will be offered where the public can address the legislative body directly in real time. Additionally, public comments will be allowed up until the public comment period is closed at the meetings. The agenda will include information on the manner in which the public may access the meeting and provide comments remotely. If technical problems arise that result in the public's access being disrupted, the legislative body will not take any vote or other official action until the technical disruption is corrected and public access is restored.

The attached Resolution allows the Executive Committee to implement AB 361 by making the findings discussed above. These findings will be in effect for 30 days or until the Executive Committee makes findings that the conditions listed therein no longer exist, whichever is shorter. The findings can be extended by the Executive Committee upon a finding that conditions supporting the findings included in the Resolution still exist. The authorization to meet remotely will also apply to any Committees that meet during the 30-day effective period.

AB 361 will allow for virtual meetings during other state-proclaimed emergencies, such as earthquakes or wildfires, where physical attendance may present a risk. AB 361 is scheduled to sunset January 1, 2024.

Prior Action(s):

May 2, 2022: The Executive Committee affirmed the findings of the Executive Committee in Resolution Number 01-22, adopted on April 4, 2022, which are: 1) the Governor proclaimed a State of Emergency on March 4, 2020, related to the COVID-19 pandemic, which State of Emergency continues to exist today; and 2) State or local officials have recommended measures to promote social distancing.

April 4, 2022: The Executive Committee adopted Resolution Number 01-22; A Resolution of the Executive Committee of the Western Riverside Council of Governments Authorizing Virtual Committee Meetings Pursuant to AB 361.

Fiscal Impact:

This item is for informational purposes only; therefore, there is no fiscal impact.

Attachment(s):

[Attachment 1 - Resolution Number 01-22: AB 361 findings](#)



Western Riverside Council of Governments

County of Riverside • City of Banning • City of Beaumont • City of Colimesa • City of Canyon Lake • City of Corona • City of Eastvale
City of Hemet • City of Jurupa Valley • City of Lake Elsinore • City of Menifee • City of Moreno Valley • City of Murrieta • City of Norco
City of Perris • City of Riverside • City of San Jacinto • City of Temecula • City of Wildomar • Eastern Municipal Water District
Western Municipal Water District • Riverside County Superintendent of Schools

RESOLUTION NUMBER 01-22

**A RESOLUTION OF THE EXECUTIVE COMMITTEE OF THE
WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS
AUTHORIZING VIRTUAL COMMITTEE MEETINGS PURSUANT TO AB 361**

WHEREAS, the Western Riverside Council of Governments (“WRCOG”) is committed to preserving and nurturing public access and participation in meetings of the Executive Committee, Administration & Finance Committee, Technical Advisory Committee, Planning Directors Committee, Public Works Committee, Finance Directors Committee, and the Solid Waste Committee; and

WHEREAS, all meetings of WRCOG’s legislative bodies, including its Executive Committee, Administration & Finance Committee, Technical Advisory Committee, Planning Directors Committee, Public Works Committee, Finance Directors Committee, and the Solid Waste Committee, are open and public, as required by the Ralph M. Brown Act (Cal. Gov. Code 54950 – 54963), so that any member of the public may attend and participate in WRCOG’s meetings; and

WHEREAS, starting in March 2020, in response to the spread of COVID-19 in the State of California, the Governor issued a number of executive orders aimed at containing the COVID-19 virus; and

WHEREAS, among other things, these orders waived certain requirements of the Brown Act to allow legislative bodies to meet virtually; and

WHEREAS, pursuant to the Governor’s executive orders, WRCOG has been holding virtual meetings during the pandemic in the interest of protecting the health and safety of the public, WRCOG staff, and WRCOG’s Committee members; and

WHEREAS, the Governor’s executive order related to the suspension of certain provisions of the Brown Act expired on September 30, 2021; and

WHEREAS, on September 16, 2021, the Governor signed AB 361 (in effect as of October 1, 2021 – Government Code Section 54953(e)), which allows legislative bodies to meet virtually provided there is a state of emergency, and either (1) state or local officials have imposed or recommended measures to promote social distancing; or (2) the legislative body determines by majority vote that meeting in person would present imminent risks to the health and safety of attendees; and

WHEREAS, such conditions now exist in WRCOG, specifically, a state of emergency has been proclaimed related to COVID-19 and state or local officials are recommending measures to promote social distancing.

NOW THEREFORE, BE IT RESOLVED by the Executive Committee of the Western Riverside Council of Governments as follows:

Section 1. Recitals. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

Section 2. Findings. Consistent with the provisions of Government Code Section 54953(e), the Executive Committee finds and determines that (1) a state of emergency related to COVID-19 is currently in effect and (2) state or local officials have recommended measures to promote social distancing in connection with COVID-19.

Section 3. Remote Teleconference Meetings. Based on the findings and determinations included herein, the Executive Committee authorizes and directs any of its legislative bodies, including, without limitation, its Executive Committee, Administration & Finance Committee, Technical Advisory Committee, Planning Directors Committee, Public Works Committee, Finance Directors Committee, and Solid Waste Committee, to conduct remote teleconference meetings under the provisions of Government Code Section 54953(e) and that such bodies shall provide public access to their meetings as provided in Section 54953(e).

Section 4. Effective Date of Resolution. This Resolution shall take effect upon adoption and shall be effective for 30 days unless extended by a majority vote of the Executive Committee in accordance with Section 5 of this Resolution.

Section 5. Extension by Motion; Supersede. The Executive Committee may extend the application of this Resolution by motion and majority vote by up to 30 days at a time, provided that it makes all necessary findings consistent with and pursuant to the requirements of Section 54953(e)(3). Any such extension may be made before or after the expiration of the preceding 30-day period. This Resolution supersedes Resolution Number 26-21.

Section 6. Full and Fair Access. In making the findings included herein, the Executive Committee specifically relies on Section 8(b) of Statutes 2021, c.165 (AB 361, § 3, effective September 16, 2021) which provides as follows:

- (b) The Legislature finds and declares that [the changes made by AB 361 to] Section 54953 of the Government Code, all increase and potentially limit the public's right of access to the meetings of public bodies or the writings of public officials and agencies within the meaning of Section 3 of Article I of the California Constitution. Pursuant to that constitutional provision, the Legislature makes the following findings to demonstrate the interest protected by this limitation and the need for protecting that interest:
 - (1) By removing the requirement that public meetings be conducted at a primary physical location with a quorum of members present, this act protects the health and safety of civil servants and the public and does not preference the experience of members of the public who might be able to attend a meeting in a physical location over members of the public who cannot travel or attend that meeting in a physical location.

- (2) By removing the requirement for agendas to be placed at the location of each public official participating in a public meeting remotely, including from the member's private home or hotel room, this act protects the personal, private information of public officials and their families while preserving the public's right to access information concerning the conduct of the people's business.

PASSED AND ADOPTED by the Executive Committee of the Western Riverside Council of Governments on April 4, 2022.

Karen S. Spiegel

Karen Spiegel, Chair
WRCOG Executive Committee

7h

Dr. Kurt Wilson, Secretary
WRCOG Executive Committee

Approved as to form:

Steven DeBaun

Steven DeBaun
WRCOG Legal Counsel

AYES: 22

NAYS: 0

ABSENT: 2

ABSTAIN: 0

Executive Committee

Minutes

1. CALL TO ORDER

The meeting of the WRCOG Executive Committee was called to order by Chair Crystal Ruiz at 2:00 p.m. on July 11, 2022, on the Zoom platform.

2. PLEDGE OF ALLEGIANCE

Committee member Jeff Hewitt led the Committee members and guests in the Pledge of Allegiance.

3. ROLL CALL

- City of Beaumont - Mike Lara
- City of Calimesa - Wendy Hewitt
- City of Canyon Lake - Dale Welty
- City of Corona - Jacque Casillas
- City of Eastvale - Christian Dinco
- City of Hemet - Russ Brown
- City of Jurupa Valley - Chris Barajas
- City of Lake Elsinore - Brian Tisdale
- City of Menifee - Matt Liesemeyer
- City of Moreno Valley - Edward Delgado
- City of Murrieta - Christi White
- City of Norco - Kevin Bash
- City of Perris - Rita Rogers
- City of Riverside - Ronaldo Fierro*
- City of San Jacinto - Crystal Ruiz (Chair)
- City of Temecula - James Stewart
- City of Wildomar - Ben Benoit*
- County, District 1 - Kevin Jeffries
- County, District 2 - Karen Spiegel
- County, District 5 - Jeff Hewitt
- Eastern Municipal Water District (EMWD) - Phil Paule*
- Western Municipal Water District (WMWD) - Brenda Dennstedt
- WRCOG Executive Director - Dr. Kurt Wilson

*Arrived after Roll Call

4. PUBLIC COMMENTS

There were no public comments.

5. CONSENT CALENDAR

RESULT: APPROVED AS RECOMMENDED

MOVER: District 5

SECONDER: Perris

AYES: Beaumont, Calimesa, Canyon Lake, Corona, Eastvale, Hemet, Jurupa Valley, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, Temecula, District 1, District 2, District 5

The water districts do not vote on TUMF matters.

A. Assembly Bill 361 Findings

Action:

1. Affirmed the findings of the Executive Committee in Resolution Number 01-22, adopted on April 4, 2022, which are:
 - a. The Governor proclaimed a State of Emergency on March 4, 2020, related to the COVID-19 pandemic, which State of Emergency continues to exist today; and
 - b. State or local officials have recommended measures to promote social distancing.

B. Summary Minutes from the June 6, 2022, Executive Committee Meeting

Action:

1. Approved the Summary Minutes from the June 6, 2022, Executive Committee meeting.

C. Summary Minutes from the June 24, 2022, Executive Committee Meeting

Action:

1. Approved the Summary Minutes from the June 24, 2022, Executive Committee meeting.

D. Finance Department Activities Update

Action:

1. Received and filed.

E. WRCOG Committees and Agency Activities Update

Action:

1. Received and filed.

F. Report out of WRCOG Representatives on Various Committees

Action:

1. Received and filed.

G. Approval of 2022 TUMF Northwest and Pass Zones 5-Year Transportation Improvement Programs

Actions:

1. Approved the 2022 TUMF Northwest Zone 5-Year Transportation Improvement Program.
2. Approved the 2022 TUMF Pass Zone 5-Year Transportation Improvement Program.

H. Legislative Activities Update

Action:

1. Received and filed.

I. Approval of TUMF Credit Agreement

Action:

1. Authorized the Executive Director to execute a TUMF Credit Agreement with the County of Riverside and I10 Logistics Owner, LLC, for the Right-of-Way Phase of the Cherry Valley Boulevard Interchange Project for eligible TUMF credits not to exceed \$1,072,000.

6. REPORTS / DISCUSSION

A. PACE Administrative and Legal Services Update

Dr. Kurt Wilson, WRCOG Executive Director, reported that the contract being presented today separates legal services for PACE from the general representation contract. Responses to two separate distributions of Request for Proposals were reviewed by an Ad Hoc Committee consisting of representatives from this Committee. The Ad Hoc Committee provided today's requested action to the Administration & Finance Committee, which concurred with the action.

Action:

1. Authorized the Executive Director to enter into a Professional Services Agreement with Best Best & Krieger for Administrative and Legal Services for the WRCOG PACE Programs through June 30, 2024, with no more than two options to renew or amend.

RESULT: APPROVED AS RECOMMENDED

MOVER: Lake Elsinore

SECONDER: Corona

AYES: Beaumont, Calimesa, Canyon Lake, Corona, Eastvale, Hemet, Jurupa Valley, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, Temecula, District 2, District 5, WMWD

NO: District 1

B. TUMF Nexus Study Activities Update

Chris Gray, WRCOG Deputy Executive Director, reported that in October 2021 this Committee directed staff to be working on a TUMF Nexus Study update to identify projects requiring mitigation due to new development, to determine the cost of these projects, and to establish a development fee schedule to cover the cost of the TUMF Program.

Socio-economic forecasts have been completed, utilizing SCAG's Regional Transportation Plan / Sustainable Communities Strategy. Staff have meet with each member jurisdiction to confirm the

allocations of growth. Based upon SCAG's forecast, population and employment are projected to grow 40% over the next 20 years in the WRCOG subregion.

Member agencies have requested that 50 projects be added to the TUMF Network. WRCOG will evaluate each of these projects using various criteria to determine their eligibility for inclusion in the Nexus Study.

The steps to formally add a project to the Network include a formal request by the jurisdiction; staff then adds the project to the transportation model used in the Nexus Study, and then evaluates whether the project meets certain criteria (volume, threshold for capacity, and regional connectivity).

WRCOG will provide progress updates through the WRCOG Committee structure. Ultimately, if there are any changes to the fee schedule this Committee will have final approval.

Staff have been contacted by developers, project applicants, and member agencies regarding vehicle miles traveled (VMT) mitigation. Staff have spent a significant amount of time studying this matter and has determined that there is no existing program or method to do so; however, several member agencies and Agency partners have expressed interest in the creation of such an approach to VMT mitigation.

Staff first completed a Development Impact Fee Study in 2017 (updated in 2019), which was a compendium of all development-related fees in the WRCOG subregion. Staff will be releasing a new set of data in the fall of 2022.

Staff have been working on a Residential Trip Generation Study to determine traffic model fees assessed on a per square foot basis instead of a per unit basis, per Assembly Bill 602. The Study is anticipated to be completed by December 2022.

Action:

1. Received and filed.

C. 2022 WRCOG Staff Service Milestone Recognitions

Dr. Kurt Wilson, WRCOG Executive Director, reported that four of WRCOG staff members are being recognized for their service to WRCOG: Janis Leonard (15 years); Tyler Masters (10 years); Ichelle Acosta (5 years); and Harry Sandoval (5 years).

Actions:

1. Received and filed.

D. Activities Update from the Eastern Municipal Water District / Western Municipal Water District

Joe Mouawad, Eastern Municipal Water District (EMWD) General Manager, reported that the western part of the country is in its third year of a serious drought, with 97% of California experiencing severe drought, including some of the driest conditions over the past 1,200 years.

Of the six major reservoirs located throughout the state, only two (Lake Mathews and Diamond Valley Lake) are over 50% capacity.

Water to southern California is imported through the State Water Project at 5% allocation, and the upper Colorado River Basin. The concern to the western U.S. is not only water supply, but hydro electro power generation. The U.S. Bureau of Reclamation has called for the seven states that share water from the Colorado River to come together and agree on reducing their take from the Colorado River to between 2 million and 4 million acre feet by next year. If an agreement cannot be made, the Bureau will begin mandating reductions. These reductions could include a limitation of 50 gallons per person, per day, and/or one day per week of outside watering. Neither WMWD nor EMWD are impacted due to the levels of stored water and their ability to shift stored water.

In October 2021, Governor Newsome declared a drought statewide, followed by a declaration in November 2021 by the Metropolitan Water District. While December 2021 was one of the wettest months on record, January 2022 was one of the driest months on record. The State has asked for a 15% voluntary water reductions, but may become mandatory by August, and has also banned the use of potable water for nonfunctional turf for commercial, industrial, and institutional customers. The Board of Directors for both EMWD and WMWD have adopted actions to support this mandate.

Both water agencies have implemented increased outreach related to conservation and education, and continued development of local supply projects, such as groundwater desalination and cleanup, groundwater recharge, recycling bot potable and non-potable water, and stormwater capture.

Craig Miller, Western Municipal Water District (WMWD) General Manager, reported that Solve the Water Crisis Coalition consists of General Managers who are attempting to change the trajectory of the State's water planning process. Both water agencies participate in the Coalition. This Collation aims to educate key stakeholders on the importance of long-term solution to the state's recurring water issues.

While a majority of water falls in northern California, a majority of the demands are in southern California. The Coalition wants to build surface and groundwater storage and be able to move water around the state.

The Coalition has 24 confirmed members, and there are more than 50 agencies interested in joining. More information on the Coalition can be found at <https://www.solvethewatercrisis.com/>.

Committee member Christian Dinco indicated that the City of Eastvale would like to join the Coalition.

Action:

1. Received and filed.

7. REPORT FROM THE TECHNICAL ADVISORY COMMITTEE CHAIR

Technical Advisory Committee (TAC) Chair Jeff Van Wagenen had no report.

8. REPORT FROM COMMITTEE REPRESENTATIVES

Committee member Ted Hoffman, SAWPA OWOW representative, reported that the SAWPA Board received 24 projects for the Proposition 1 Round II funding; only five were from Riverside County. SAWPA has until July 19, 2022, to make final funding recommendations. The Jurupa Community Services District is working on its inner valley water quality and water resiliency project. The Cities of

Lake Elsinore and San Jacinto are working on an algae harvesting project to clean their watersheds. The Riverside Highlands Water Company is working on a water wells project for nitrate removal. SAWPA is working on a project regarding seeding clouds.

Committee member Ben Benoit, South Coast AQMD representative for cities in Riverside County, reported that next month the AQMD Board is having a public meeting on its Air Quality Management Plan.

9. REPORT FROM THE EXECUTIVE COMMITTEE CHAIR

Chair Ruiz thanked everyone for their attendance at General Assembly. Chair Ruiz presented Janis Leonard, WRCOG Administrative Services Manager, with flowers in honor of her birthday.

10. REPORT FROM THE EXECUTIVE DIRECTOR

Dr. Wilson reported that if anyone has an interest in participating in an Ad Hoc Committee on legislation advocacy, next year's General Assembly, and budget matters, to name a few, to please contact him. WRCOG is just a little more than half way through the first year of operating under the Strategic Plan; updates will be provided in the near future, and will include discussions regarding in-person meetings. Dr. Wilson will also begin scheduling individual update meetings with member agencies.

11. ITEMS FOR FUTURE AGENDAS

There were no items for future agendas.

12. GENERAL ANNOUNCEMENTS

Committee member Kevin Bash requested confirmation on agendizing further water / drought presentations.

13. CLOSED SESSION

Steve DeBaun, WRCOG Legal Counsel, announced that there are four closed session matters as listed on the agenda.

CONFERENCE WITH LEGAL COUNSEL - Existing initiation of litigation pursuant to Government Code Section 54956.9(d)(1)

- Case No. 37-2021-00008300-CU-MC-CTL (Carey)
- Case No. 37-2021-00014856-CU-MC-NC (Molina-Duarte)
- Case No. RIC 1904645 (Norton Rose)
- Case No. 20-2164-GW-KKx (AIG)

There were no reportable actions.

14. NEXT MEETING

The next Executive Committee meeting is scheduled for Monday, August 1, 2022, at 2:00 p.m., on the

Zoom platform with the option for Committee members to attend in person at WRCOG's office.

15. ADJOURNMENT

The meeting was adjourned at 4:17 p.m.



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: Finance Department Activities Update
Contact: Andrew Ruiz, Chief Financial Officer, aruiz@wrcog.us, (951) 405-6740
Date: August 1, 2022

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to provide an update on the Agency financials through May 2022.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #3 - Ensure fiscal solvency and stability of the Western Riverside Council of Governments.

Background:

On January 12, 2022, the Executive Committee adopted a new Strategic Plan with specific fiscal-related goals:

1. Maintain sound, responsible fiscal policies.
2. Develop a process to vet fiscal impact(s) and potential risk(s) for all new programs and projects.
3. Provide detailed financial statements for public review online.

As staff begin to work on meeting these goals, they will seek input through WRCOG's Committee structure regarding updates and to ensure these goals are being met.

Financial Report Summary Through May 2022

The Agency's Financial Report summary through May 2022, a monthly overview of WRCOG's financial statements in the form of combined Agency revenues and costs, is provided as Attachment 1. Please note that the Financial Summary Report will be undergoing a complete change in the coming months, with more detail, in alignment with Strategic Plan Goal #3.

Fiscal Year (FY) 2021/2022 Year End and Agency Audit

Fiscal Year 2021/2022 has now ended and staff are beginning to work on closing the Agency's books. WRCOG will be utilizing the services of the audit firm Van Lant and Fankhanel (VLF) to conduct its financial audit. During FY 2021/2022, an RFP was released for financial auditing services as a Government Finance Officers Association (GFOA) best practice, as WRCOG has utilized auditing firm

Rogers, Anderson, Malody and Scott for the past five years. WRCOG ended up selecting a new audit firm (VLF) to conduct its audits based on the results of the RFP.

In July 2022, VLF will be conducting the first phase of the audit, known as the interim audit, which involves preliminary audit work that is conducted prior to the books being fully closed. The interim audit tasks are conducted in order to gain an understanding of the Agency's processes during the year and to compress the period needed to complete the final audit after the books have been closed. The final audit is scheduled for October 2022.

Prior Action(s):

April 13, 2022: The Administration and Finance Committee received and filed.

Fiscal Impact:

This item is for informational purposes only; therefore, there is no fiscal impact.

Attachment(s):

[Attachment 1 - May 2022 Financials](#)



Western Riverside Council of Governments

Budget to Actuals

For Month Ending May 31, 2022

	Approved Budget 6/30/2022	Actual Thru 5/31/2022	Remaining Budget 6/30/2022
Total Agency			
Revenues			
Member Dues	286,640	294,410	(7,770)
Interest Revenue - Other	17,500	2,843	14,657
Overhead Transfer In	2,000,000	1,758,154	241,846
TUMF Commercial	4,800,000	913,362	3,886,638
TUMF Retail	4,800,000	4,092,089	707,911
TUMF Industrial	7,680,000	11,108,653	(3,428,653)
TUMF Single Family	19,200,000	41,635,258	(22,435,258)
TUMF Multi Family	9,600,000	4,086,558	5,513,442
TUMF Commerical - Admin Fee	200,000	38,057	161,943
TUMF Retail - Admin Fee	200,000	170,504	29,496
TUMF Industrial - Admin Fee	320,000	462,861	(142,861)
TUMF Single Family - Admin Fee	800,000	1,734,802	(934,802)
TUMF Multi-Family - Admin	400,000	170,273	229,727
TUMF Beaumont Settlement	-	25,000	(25,000)
Grant Revenue	1,663,000	579,265	1,083,735
LTF Revenue	750,000	866,250	(116,250)
RIVTAM	50,000	45,300	4,700
Fellowship Revenue	100,000	180,824	(80,824)
PACE Admin Revenue	3,179,548	2,300,598	878,950
Clean Cities Revenue	240,000	253,764	(13,764)
Solid Waste Revenue	112,970	160,202	(47,232)
Used Oil Grants	168,023	168,023	-
Gas Co. Prtnrshp Revenue	108,400	63,749	44,651
Regional Streetlights Revenue	211,725	146,759	64,966
PACE Commercial Sponsor Revenue	400,000	334,077	65,923
Total Revenues	\$ 58,598,569	\$ 71,680,796	\$ (13,082,227)
Expenses			
Salaries & Wages - Fulltime	2,745,899	2,221,757	524,142
Fringe Benefits	1,319,884	1,097,799	222,085
Overhead Allocation	1,682,458	1,542,253	140,205
General Legal Services	1,868,100	1,626,083	242,017
Audit Svcs - Professional Fees	35,000	30,125	4,875
Bank Fees	33,885	87,560	(53,675)
Commissioners Per Diem	57,500	47,600	9,900
Parking Cost	20,000	20,079	(79)
Office Lease	350,000	306,124	43,876
Fuel Expense	1,500	123	1,377
Parking Validations	15,450	3,759	11,691
Staff Recognition	1,000	423	577
Coffee and Supplies	3,000	2,409	591
Event Support	95,737	51,467	44,270
Meeting Support Services	5,250	362	4,888
Program/Office Supplies	13,700	18,180	(4,480)
Misc. Office Equipment	1,000	873	127
Supplies/Materials	33,540	27,573	5,967
Computer Equipment/Supplies	2,000	5,218	(3,218)
Computer Software	102,000	69,005	32,995
Rent/Lease Equipment	15,000	8,674	6,326
Membership Dues	31,750	18,627	13,123
Subscriptions/Publications	4,250	9,880	(5,630)



Western Riverside Council of Governments

Budget to Actuals

For Month Ending May 31, 2022

	Approved Budget 6/30/2022	Actual Thru 5/31/2022	Remaining Budget 6/30/2022
Total Agency			
Postage	5,350	5,431	(81)
Other Household Expenses	3,250	1,724	1,526
Storage	5,000	4,993	7
Recording Fee	10,000	16,322	(6,322)
Printing Services	4,000	1,712	2,288
Computer Hardware	16,500	3,542	12,958
Communications - Regular Phone	16,000	16,627	(627)
Communications - Cellular Phones	13,500	11,182	2,318
Communications - Computer Services	53,000	22,976	30,024
Equipment Maintenance	10,500	8,223	2,277
Insurance - Errors & Omissions	15,000	9,335	5,665
Insurance - Gen/Busi Liab/Auto	99,500	70,869	28,631
WRCOG Auto Insurance	4,500	2,802	1,698
TUMF Project Reimbursement	46,080,000	13,134,072	32,945,928
Seminars/Conferences	9,650	6,577	3,073
Travel - Mileage Reimbursement	9,500	3,679	5,821
Travel - Ground Transportation	2,300	1,061	1,239
Travel - Airfare	4,250	3,820	430
Lodging	3,800	2,401	1,399
Meals	7,400	4,310	3,090
Other Incidentals	5,000	3,624	1,376
Training	7,500	10,485	(2,985)
Consulting Labor	2,924,616	1,544,890	1,379,726
Total Expenses	\$ 57,513,228	\$ 22,328,631	\$ 36,226,352



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: WRCOG Committees and Agency Activities Update
Contact: Chris Gray, Deputy Executive Director, cgray@wrcog.us, (951) 405-6710
Date: August 1, 2022

Requested Action(s):

1. Receive and file.
-

Purpose:

The purpose of this item is to provide updates on noteworthy actions and discussions held in recent WRCOG standing Committee meetings, and to provide general project updates.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #4 - Communicate proactively about the role and activities of the Council of Governments and its members.

Background:

Attached are summary recaps of actions and activities from recent WRCOG standing Committee meetings that occurred during the month of July 2022.

Prior Action(s):

July 11, 2022: The Executive Committee received and filed.

Fiscal Impact:

This item is for informational purposes only; therefore, there is no fiscal impact.

Attachment(s):

[Attachment 1 - July 2022 Recaps](#)



**Western Riverside Council of Governments
Executive Committee and Supporting Foundation
Meetings Recap**
July 11, 2022

Following is a summary of key items discussed at the last Executive Committee meeting.

Agenda Packet: <https://wrcog.us/DocumentCenter/View/9529/ec071122>

PowerPoint Presentation: <https://wrcog.us/DocumentCenter/View/9551/ec071122pp>

PACE Administrative and Legal Services Update

- Approved a contract with BB&K for PACE Programs Administrative and Legal Services through June 30, 2024.

TUMF Nexus Study Activities Update

- Over the past several months, staff and consultants have been meeting with member agencies to review the Network for the Nexus Study.
- These agencies requested that 50 projects be added to the Nexus Study. WRCOG will evaluate each of these projects using various criteria to determine their eligibility for inclusion in the Nexus Study.
- Staff also provided an update on efforts to evaluate options to mitigate VMT, an evaluation of development fees in the WRCOG subregion, and a study of the effects of household size and travel behavior.

2022 WRCOG Staff Service Milestone Recognitions

- The following staff members were recognized for their service to WRCOG:
 - Janis Leonard (15 years)
 - Tyler Mastes (10 years)
 - Ichelle Acosta (5 years)
 - Harry Sandoval (5 years)

Activities Update from the EMWD / WMWD

- General Managers Joe Mouawad (EMWD) and Craig Miller (WMWD) presented on the drought.
- 97% of the state is experiencing severe drought, including some of the driest conditions over the past 1,200 years.
- Both water agencies have implemented increased outreach related to conservation and education, and continued development of local supply projects.
- Both agencies are partnering with a number of local and regional water agencies in the formation of the Solve the Water Crisis Coalition. This Coalition aims to educate key stakeholders on the importance of long-term solution to the state's recurring water issues. More information on the Coalition can be found at <https://www.solvethewatercrisis.com/>.
- Any agency interested in learning more about the Solve the Water Crisis Coalition can contact Joe Mouawad (mouawadj@emwd.org) or Craig Miller (cmiller@wmwd.com).

Next Meeting

The next Executive Committee meeting is scheduled for Monday, August 1, 2022, at 2:00 p.m., on the Zoom platform with the option for Committee members to attend in-person at WRCOG's office.



**Western Riverside Council of Governments
Administration & Finance Committee
Meeting Recap
July 13, 2022**

Following is a summary of key items discussed at the last Administration & Finance Committee meeting.

Agenda Packet: <https://wrcog.us/DocumentCenter/View/9530/af071322>

PowerPoint Presentation: <https://wrcog.us/DocumentCenter/View/9552/af071322pp>

PACE Programs Activities Update: Adoption of Unclaimed Refund Policy and Procedure

- Property owners receive refunds related to PACE assessments if they pre-pay or pay-off their PACE assessments prior to payment of their property tax bill.
- After multiple attempts to distribute the refunds, some refunds go unclaimed. As of June 2022, a total of \$238,889 is unclaimed.
- Per Government Code Section 68084.1, WRCOG needs to adopt an Unclaimed Refund Policy and Procedure before any unclaimed refunds can be moved or reverted. Adoption of this Policy would create a procedure for the final noticing before reverting funds to the PACE Reserve Account.
- Committee requested additional information be researched and brought back to further discussion regarding, but not limited to, where the money goes if it is escheated to the state and website/portal opportunities for property owners to identify if they have a PACE unclaimed refund.

Fiscal Year 2021/2022 TUMF Collection Update

- Throughout the Fiscal Year, the TUMF Program has collected nearly \$70M with projected collections of \$75M once all pending payments are processed.
- There is significant development activity in the I-215 Corridor, the Hemet/San Jacinto Zone, and the Pass Zone.
- Much of this revenue is associated with Single-family and Industrial development.

Next Meeting

The Administration & Finance Committee is DARK in the month of August. The next Committee meeting is scheduled for September 14, 2022, at 12:00 p.m., on the Zoom platform with the option for Committee members to attend in person at the WRCOG office.



**Western Riverside Council of Governments
Technical Advisory Committee
Meeting Recap
July 21, 2022**

Following is a summary of key items discussed at the last Technical Advisory Committee meeting.

Agenda Packet: <https://wrcog.us/DocumentCenter/View/9557/tac072122>

PowerPoint Presentation: <https://wrcog.us/DocumentCenter/View/9561/tac0722pp>

TAC Leadership for Fiscal Year 2022/2023

- The Technical Advisory Committee selected Rob Johnson (San Jacinto) as Chair, Rod Butler (Jurupa Valley) as Vice-Chair, and Clara Miramontes (Perris) as Second Vice-Chair

Smart Streetlight Implementation Plan and Broadband Assessment

- The Smart Streetlight Implementation Plan & Broadband Assessment is a strategy that is completely scalable, can be applied to the wide range of community contexts in WRCOG's member jurisdictions, and can be used by WRCOG or its individual member agencies to develop a smart city program.
- The Smart Streetlight Implementation Plan was developed in a multi-step process, including an agency readiness survey and stakeholder engagement, peer review and smart city research, technology review, procurement strategies review, and an implementation strategy. The implementation strategy is a three-phase process: 1) Assessment, 2) Test, and 3) Expand. In Phase 1, an agency assessment, needs assessment, and a technology assessment will need take place to inform the planning and implementation of a smart streetlight / smart city program. In Phase 2, a test / pilot project is recommended as it allows agencies to see the real-world implications of a technology at a minimal investment and allows for cost-benefit analysis prior to full scale deployment. Finally, Phase 3 activities include identifying procurement strategies and funding mechanisms and deploying the project at full-scale.
- Broadband is a key requirement for smart cities. The Broadband Assessment was included in the Smart Streetlight Implementation Plan at the request of one of WRCOG's member agencies. This document summarizes the stakeholder engagement and broadband programs' research conducted on the County of Riverside's RIVCO Connect, the Inland Empire Regional Broadband Consortium (IERBC), the City of Loma Linda's Connected Communities Program (LLCCP), the City of Rancho Cucamonga's "Rancho Fiber" municipal broadband program, and the South Bay Cities COG "South Bay Fiber Network." Following the completion of the Broadband Assessment, staff have identified potential activities that WRCOG can take to support broadband development and implementation in Western Riverside County.

Fiscal Year 2021/2022 TUMF Collection Update

- Throughout the Fiscal Year, the TUMF Program has collected nearly \$70M with projected collections of \$75M once all pending payments are processed.
- There is significant development activity is the I-215 Corridor, the Hemet/San Jacinto Zone, and the Pass Zone.
- Much of this revenue is associated with Single-family and Industrial development.

Update from SCAG

- Please see attached Public Comment from Arnold San Miguel, Regional Affairs Officer.

Next Meeting

The next Technical Advisory Committee meeting is scheduled for Thursday, August 18, 2022, at 9:30 a.m., on the Zoom platform with the option for Committee members to attend in person.

Public Comment at WRCOG July 21, 2022, TAC Meeting

Dear City/County Managers, Planning Directors and Subregional Partners:

As you are probably aware, Senate Bill (SB) 197 was enacted into law late last month and changed the Housing Element rezoning deadlines for jurisdictions in the SCAG region. Jurisdictions that have an adopted housing element found in compliance by the HCD by Oct. 15, 2022, generally, will have until February 2025 to complete required rezonings. HCD urges SCAG jurisdictions that do not yet have an adopted housing element deemed compliant with Housing Element Law to submit their adopted housing elements to HCD no later than Aug. 15, 2022.

SCAG has resources that may support jurisdictions experiencing challenges in meeting housing element requirements and their implementation. For questions on potential technical assistance, please contact housing@scag.ca.gov.

Information not included in my public comments:

HCD's statutory review period for adopted housing elements is 60 days. Submittal by Aug. 15 does not guarantee that HCD will find your jurisdiction's adopted housing element in compliance with Housing Element Law but does ensure that HCD will review your jurisdiction's adopted housing element and issue a findings letter by the Oct. 15 deadline specified in SB 197.

HCD recommends submitting adopted housing elements for review no later than Aug. 15 (preferably earlier) to allow for the statutory 60-day HCD review.

SCAG jurisdictions that do not have an adopted housing element found in compliance by HCD by the October date will be subject to the rezoning requirements of Assembly Bill 1398 and cannot be found in compliance until rezoning is complete.

For general information about housing elements, please contact HousingElements@hcd.ca.gov or visit hcd.ca.gov/housing-elements-hcd.

Thanks,
Arnold



Arnold San Miguel

Regional Affairs Officer
Tel: (213) 236-1925
Mobile: (213) 453-6594
sanmigue@scag.ca.gov

Riverside County Regional Office
3410 10th Street, Ste. 805, Riverside, CA 92501

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017





Western Riverside Council of Governments Executive Committee

Staff Report

Subject: Report out of WRCOG Representatives on Various Committees
Contact: Chris Gray, Deputy Executive Director, cgray@wrcog.us, (951) 405-6710
Date: August 1, 2022

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to inform the Executive Committee of activities occurring on the various Committees in which WRCOG has an appointed representative.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #1- Serve as an advocate at the regional, state, and federal level for the Western Riverside region.

Background:

This item serves as a placeholder for WRCOG representatives' use in providing materials pertaining to meetings of the Committee they have been appointed to.

CALCOG Board of Directors (Brian Tisdale)

The CALCOG Board of Directors met on July 15, 2022. The agenda is attached for reference. Agenda highlights include:

1. State Budget Summary.
2. Legislative Update.
3. Developments Related to Regional Planning.
4. Dues & Budget Proposal.

The next CALCOG Board of Directors meeting is scheduled for August 19, 2022.

SANDAG Borders Committee (Crystal Ruiz)

The next SANDAG Borders Committee meeting is scheduled for August 26, 2022.

SAWPA OWOW Steering Committee (Ted Hoffman)

The next SAWPA OWOW Steering Committee meeting is scheduled for July 28, 2022. Agenda

highlights include:

1. Proposition 1 Round 1 Integrated Regional Water Management Status Update.
2. Proposition 1 Round 2 Integrated Regional Water Management Call for Projects Update.

Prior Action(s):

July 11, 2022: The Executive Committee received and filed.

Fiscal Impact:

WRCOG stipends are included in the Agency's adopted Fiscal Year 2021/2022 Budget under the General Fund.

Attachment(s):

[Attachment 1 - CALCOG Board agenda 071522](#)

[Attachment 2 - SAWPA OWOW agenda 072822](#)

Attachment

CALCOG Board agenda
July 15, 2022



California Association of Councils of Governments

Effective Regions Through Partnership

BOARD OF DIRECTORS

MEETING AGENDA

July 15, 2022

2:00 pm to 3:30 pm

Meeting Connection Information:

Zoom Link:

<https://us02web.zoom.us/j/6334525293?pwd=RzZHUldwV25DbIBGcVd1YnJwVlJxQT09>

Meeting ID: 633 452 5293

Passcode: CALCOG

Having trouble? Email Natalie at nzoma@calcog.org

BOARD MEETING AGENDA

TIME	ITEM	DESCRIPTION	PURPOSE	PAGE
1:00 pm	1	Welcome & Roll Call. Staff will mark attendance as members enter the virtual meeting space. Please have type your name in the Zoom identifier. For agency staff monitoring the meeting, please type in your name and turn off your video.		
1:05 pm	2	Approval of the Minutes	Action	7
10:12 am	3	Executive Director Report. An quick update of developments in the work program. <i>Presentation at Meeting</i>	Information	n/a
POLICY ITEMS				
10:20 am	4	State Budget Summary. Review of state budget as it applied to CALCOG members, including changes to REAP programs (1 & 2). <i>Presentation at Meeting</i>	Information	n/a
10:30 am	5	Legislative Update. Update of where we are on bills, and issues we anticipate at end of session. <i>Presentation at Meeting</i>	Information	n/a
10:45 am	6	Developments Related to Regional Planning. Significant participation in guideline development will also be required in 2022.	Information	12
BUDGET & DUES				
12:00 pm	10	Dues & Budget Proposal. How does the board want to proceed going forward?	Action	27
12:20 pm		Final Announcements & Adjourn.		

Attachment

SAWPA OWOW agenda
July 28, 2022



...A United Voice for the Santa Ana River Watershed

OWOW Steering Committee Members

Bruce Whitaker, Convener | SAWPA Commissioner
Brenda Dennstedt, SAWPA Commissioner
Katrina Foley, Orange County Supervisor
Karen Spiegel, Riverside County Supervisor
Curt Hagman, San Bernardino County Supervisor
James Hessler, Altman Plants

Garry W. Brown, Orange County Coastkeeper
Joe Kerr, Regional Water Quality Control Board
Deborah Robertson, Mayor, City of Rialto
Ted Hoffman, Councilmember, City of Norco
Nicholas Dunlap, Mayor Pro Tem, City of Fullerton

PURSUANT TO THE PROVISIONS OF AB 361, THIS MEETING WILL BE CONDUCTED VIRTUALLY WITH THE OPPORTUNITY FOR PUBLIC COMMENT. ALL VOTES TAKEN WILL BE CONDUCTED BY ORAL ROLL CALL.

This meeting will be accessible as follows:

Meeting Access Via Computer (Zoom)*:	Meeting Access Via Telephone*:
<ul style="list-style-type: none"> https://sawpa.zoom.us/j/86326610447 	<ul style="list-style-type: none"> 1 (669) 900-6833
<ul style="list-style-type: none"> Meeting ID: 863 2661 0447 	<ul style="list-style-type: none"> Meeting ID: 863 2661 0447
<p>* Participation in the meeting via the Zoom app (a free download) is strongly encouraged; there is no way to protect your privacy if you elect to call in by phone to the meeting.</p>	

**REGULAR MEETING OF THE
OWOW STEERING COMMITTEE
Thursday, July 28, 2022 – 11:00 a.m.**

AGENDA

- 1. CALL TO ORDER | PLEDGE OF ALLEGIANCE (Bruce Whitaker, Convener)**
- 2. PUBLIC COMMENTS**
Members of the public may address the Committee on items within the jurisdiction of the Committee; however, no action may be taken on an item not appearing on the agenda unless the action is otherwise authorized by Government Code §54954.2(b).
- 3. APPROVAL OF MEETING MINUTES: JANUARY 27, 2022**



...A United Voice for the Santa Ana River Watershed

4. BUSINESS ITEMS

A. Proposition 1 Round 1 Integrated Regional Water Management Status Update (SC#2022.4)

Presenter: Marie Jauregui
Recommendation: Receive and file.

B. Proposition 1 Round 2 Integrated Regional Water Management Call for Projects Update (SC#2022.5)

Presenter: Ian Achimore
Recommendation: Receive and file.

5. COMMITTEE MEMBERS' COMMENTS

6. REQUEST FOR FUTURE AGENDA ITEMS

7. ADJOURNMENT

PLEASE NOTE:

Americans with Disabilities Act: Meeting rooms are wheelchair accessible. If you require any special disability related accommodations to participate in this meeting, please contact (951) 354-4220 or svilla@sawpa.org. Notification at least 48 hours prior to the meeting will enable staff to make reasonable arrangements to ensure accessibility for this meeting. Requests should specify the nature of the disability and the type of accommodation requested.

Materials related to an item on this agenda submitted to the Committee after distribution of the agenda packet are available for public inspection during normal business hours at the SAWPA office, 11615 Sterling Avenue, Riverside, and available at www.sawpa.org, subject to staff's ability to post documents prior to the meeting.

Declaration of Posting

I, Sara Villa, Clerk of the Board of the Santa Ana Watershed Project Authority declare that on July 21, 2022, a copy of this agenda has been uploaded to the SAWPA website at www.sawpa.org and posted at the SAWPA office, 11615 Sterling Avenue, Riverside, California.

2022 OWOW Steering Committee Regular Meetings

Fourth Thursday of Every Other Month (January, March, May, July, September, November)
 (Note: All meetings begin at 11:00 a.m., unless otherwise noticed, and are held at SAWPA.)

January 1/27/22 Regular Committee Meeting	March 3/24/22 Regular Committee Meeting [cancelled]
May 5/26/22 Regular Committee Meeting [cancelled]	July 7/28/22 Regular Committee Meeting
September 9/22/22 Regular Committee Meeting	November 11/17/22* Regular Committee Meeting*

* Meeting date adjusted due to conflicting holiday.



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: Legislative Activities Update
Contact: Bill Blankenship, On-Call Legislative Consultant, billblankenship63@gmail.com, (951) 206-9020
Date: August 1, 2022

Requested Action(s):

1. Receive and file.
-

Purpose:

The purpose of this items to provide an update on key housing legislative items.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #1 - Serve as an advocate at the regional, state, and federal level for the Western Riverside subregion.

Background:

This item is reserved for an update on key legislative proposals, dates, and deadlines. The updates are summarized as an attachment to this Staff Report.

Prior Action(s):

July 11, 2022: The Executive Committee received and filed.

Fiscal Impact:

All staff and consultant expenses related to the preparation of this update are included in Fund 110 (General Fund) under the Transportation & Planning Department associated with the REAP Program. SCAG is reimbursing WRCOG for all expenses related to this item as part of the previously approved REAP Grant.

Attachment(s):

[Attachment 1 - Legislative Update August 2022](#)

Key Legislative Deadlines - 2022 Legislative Session

- **February 18th** - Last day for new bills to be introduced.
- **May 27th** - Last day for bills to be passed out of the house of origin.
- **June 15th** - State Budget must be passed.
- **June 30th** - Last day for legislative measures to be placed on the November 8th Ballot.
- **July 1st** - Last day for policy committees to meet and report bills.
- **July 1st - July 31st** - Legislative Summer recess.
- **August 1st – Legislature reconvenes from Summer Recess.**
- **August 12th** - Last day for fiscal committees to meet and report bills.
- **August 25th** - Last Day to amend bills.
- **August 31st** - Last day for each house to pass bills.

2021 Bills that are active 2-year bills

SB 490, as amended, Caballero. Housing acquisition and rehabilitation: technical assistance

The bill would, upon appropriation by the Legislature, establish the Housing Acquisition and Rehabilitation Technical Assistance Program, with the purpose of providing technical assistance to qualified entities engaged in acquisition-rehabilitation projects. The bill would define “acquisition-rehabilitation project” as a project to acquire and preserve unsubsidized housing units and attaching long-term affordability restrictions on the housing units. The bill would define “qualified entity” to include an eligible nonprofit corporation, community land trust, public housing authority, a nonprofit, limited-equity, or workforce housing cooperative, a resident association or organization, and a local or a regional government agency administering an acquisition-rehabilitation project funding program. The Bill would create the Housing Acquisition and Rehabilitation Technical Assistance Fund within the State Treasury and would, upon appropriation by the Legislature, allocate the moneys in the fund to the department for the purposes of developing, implementing and administrating the program. **February 25, 2021 - the Bill was referred to the Senate Committee on Housing. June 2, 2021 the Bill was ordered to the inactive file at the request of the author. The Bill became a 2-year Bill. January 24, 2022 the Bill was read for a third time and passed out of the Senate on a vote 36-0. May 5, 2022 the Bill was referred to the Assembly Committee on Housing and Community Development. June 8, 2022 the Bill was amended by the author and on June 15, 2022 the Bill’s hearing was postponed by the Committee. June 29, 2022 the Bill passed out of Committee by a vote of 7-0 and was re-referred to the Assembly Committee on Appropriations.**

AB 411, as amended, Irwin. Veterans Housing and Homeless Prevention Bond Act of 2022. Under current law, the Veterans Housing and Homeless Prevention Bond Act of 2014 authorizes the issuance of bonds in the amount of \$600,000,000. The bond is to provide housing for veterans and their families. The bill would enact the Veterans Housing and Homeless Prevention Bond Act of 2022 which will authorize the issuance of bonds in an amount, not to exceed \$600,000,000. The bill also stipulates that the handling and disposition of the funds would occur in the same manner as the 2014 bond act. **The bill requires a 2/3rds vote. May 20, 2021 - the Bill was located in the Assembly Committee on Appropriations and the hearing was postponed by the Committee. The Bill became a 2-year Bill. January 31, 2022 the Bill was read for a third time and passed out of the Assembly on a vote of 76-0. The Bill has been ordered to the Senate and on May 5, 2022 the Bill was referred to the Senate Committees on Governance and Finance and Military and Veterans Affairs. June 1, 2022 the Bill passed out of the Committee by a vote of 8-0 and was re-referred to the Senate Committee on Governance and Finance. June 15, 2022 the Bill passed out of the Senate Committee on Governance and Finance by a vote of 5-0 and was re-referred to the Senate Committee on Appropriations. June 27, 2022 the Bill was referred to the Suspense File.**

AB 682, as amended, Bloom. Planning and zoning: density bonuses: cohousing buildings.

The current Density Bonus Law, stipulates a city or county must provide a developer that proposes a housing development project within their jurisdiction a density bonus and other incentives, if the developer agrees to construct a project with specified percentages of units for moderate-income, lower income, or very low-income households. This bill would require that a density bonus be granted to a developer who agrees to construct a

housing development that is a cohousing building, as defined by state law. The bill further stipulates that a project would meet specific requirements and contain either 10% of the total square footage for lower income households, as defined, or 5% of the total square footage for very low-income households.

March 15, 2021 - the Bill was located in the Assembly Committee on Housing and Community Development and Local Government and the hearing was postponed by the Committee. The Bill became a 2-year Bill. January 27, 2022 the Bill was read for a third time and passed out of the Assembly on a vote of 52-8. May 4, 2022 the Bill was referred to the Senate Committees on Housing and Governance and Finance. June 6, 2022 the Bill was amended and was re-referred to the Senate Committee on Housing. June 14, 2022 the Bill was re-referred to the Senate Committee on Governance and Finance and on June 22, 2022 the Bill passed out of Committee by a vote of 4-1. June 23, 2022 the Bill was referred to the Senate Committee on Appropriations.

AB 916, as amended, Salas. Zoning: accessory dwelling units: bedroom addition.

Under current Planning and Zoning Law, a city or a county is authorized to adopt ordinances that regulate the use of structures, buildings, and land for residential, commercial, industrial, and open space uses. The proposed bill would prohibit a county or a city from adopting or enforcing an ordinance that would require a public hearing as a condition of adding space for additional bedrooms or reconfiguring existing space to increase the number of bedrooms in an existing residential unit. The bill would also include findings that ensuring adequate housing is a matter of statewide concern and is not a municipal affair. ***April 6, 2021 - the Bill was located in the Assembly Committee on Housing and Community Development and was amended by the author. The Bill became a 2-year Bill. January 27, 2022 the Bill was read for a third time and passed out of the Assembly on a vote of 61-0. May 4, 2022 the Bill was referred to the Senate Committees on Housing and Governance and Finance. May 11, 2022 the Bill has been amended and was re-referred to the Senate Committee on Housing. May 31, 2022 the hearing for the Bill was postponed. June 16, 2022 the Bill was amended and was re-referred to the Senate Committee on Governance and Finance. June 30, 2022 the Bill passed out of the Senate Committee on Governance and Finance by a vote of 5-0. The Bill was referred to the Senate Committee on Appropriations.***

AB 1445, as amended, Levine. Planning and zoning: regional housing need allocation: climate change impacts.

Under current Planning and Zoning Law, each city and county are required to adopt a comprehensive general plan for development of land inside and outside of its boundaries. The general plan includes mandatory elements, such as a housing element. The law further stipulates that the council of governments or the planning department for cities and counties, without a council of governments adopt a final regional housing need plan that allocates a share of the regional housing need for each city and county. The proposed bill would stipulate, as of January 1, 2025, that a council of governments, or the Department of Housing and Community Development also consider the following: An emergency evacuation route, wildfire risk, rise in sea level risk and other impacts caused by climate change. ***March 11, 2021 - the Bill was referred to the Assembly Committee on Housing and Community Development and Local Government. The Bill became a 2-year Bill. January 31, 2022 the Bill was read for a third time and passed out of the Assembly on a vote of 57-16. May 4, 2022 the Bill was referred to the Senate Committee on Housing. June 2, 2022 the Bill was amended and was re-referred to the Senate Committee on Appropriations. June 6, 2022 the Bill was amended and was re-referred to the Senate Committee on Appropriations and on June 13, 2022 the Bill was referred to the Suspense File.***

AB 1551, as amended, Santiago. Planning and zoning: development bonuses: mixed-use projects.

Under current Density Bonus Law, a city or county must grant a developer that proposes a housing development with a density bonus, additional incentives or concessions. The incentives are provided if the developer agrees to construct a percentage of units for lower income, very low income, or senior citizen housing, among other things, subject to certain requirements. The current law was in place until January 1, 2022. The bill would reenact the above-described provisions regarding the granting of development bonuses for certain projects. The bill would also require a city or county to submit to the Department of Housing and Community Development information describing the approved commercial development bonus. The bill would repeal these provisions on January 1, 2028 and add these duties to a local planning official. ***March 11, 2021 - the Bill was referred to the Assembly Committee on Housing and Community Development and Local Government. The Bill became a 2-year Bill. January 27, 2022 the Bill was read for a third time and passed out of the Assembly on a vote 61-0. May 4, 2022 the Bill was referred to the Senate Committees on Housing and Governance and Finance. June 1, 2022 the Bill passed out of the Senate Committee***

on Governance and Finance by a vote 7-0. June 22, 2022 the Bill was referred to the Senate Committee on Appropriations.

New Bills Introduced in the 2021–2022 Legislative Session

SB 922, as amended, Wiener. California Environmental Quality Act: exemptions for transportation-related projects. Current CEQA Law, exempts requirements for bicycle transportation plans in an urbanized area. The plans include projects for restriping of streets, bicycle parking, signal timing with the purpose of improving street and highway intersection operations, related signage for bicycles, pedestrians, and vehicles. The bill would extend the current exemption from January 1, 2030 to indefinitely. The bill would also repeal the current requirement that a bicycle transportation plan is for urbanized areas and would further extend the exemption to an active transportation plan or pedestrian plan, or for a feasibility and planning study for active transportation, bicycle facilities and pedestrian facilities. ***March 16, 2022 - the Bill received author's amendments and was Re-referred to the Senate Committee on Environmental Quality. March 31, 2022 the Bill was re-referred to Committee on Appropriations and on April 18, 200 the Bill was set for a hearing. May 16, 2022 the Bill passed off the Senate Floor by a vote of 24-1. May 27, 2022 the Bill was referred to the Assembly Committee on Natural Resources. June 14, 2022 the Bill passed out of the Assembly Committee on Natural Resources by a vote of 8-1 and the Bill was referred to the Assembly Committee on Appropriations. June 29, 2022 the Bill passed out of the Assembly Committee on Appropriations by a vote of 15-0.***

SB 930, as amended, Wiener. Housing Accountability Act.

Existing law prohibits a local agency from disapproving a housing development project for very low, low or moderate-income households or from conditioning approval in a manner that renders the housing development infeasible for very low, low, or moderate income households, unless it makes specified written findings that either (1) the jurisdictions has met its share of the regional housing need or (2) the project would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. The bill would clarify that the above-described prohibitions also apply to a housing development project for extremely low-income households. ***April 18, 2022 - the Bill received author's amendments and was Re-referred to the Senate Committee on Housing. May 9, 2022 the Bill was read for a third time and passed out of the Senate on a vote 30-0. June 2, 2022 the Bill has been referred to the Assembly Committee on Governmental Organizations with amendments. The Bill no longer relates to housing and now addresses the sale of alcoholic beverages and hours of sale.***

SB 1067, as amended, Portantino. Housing development projects: automobile parking requirements.

The bill would prohibit a city or county from imposing any minimum automobile parking requirement on a housing development project, as defined, that is located within ½ mile of a public transit, as defined. The bill, would authorize a City and County to impose or enforce minimum automobile parking requirements on a housing development project if the local government demonstrates to the developer, within 30 days of the receipt of a completed application, that the development would have a negative impact, supported by the preponderance of the evidence that the city's or the county's ability to meet it's share of specified housing needs or existing or existing residential or commercial parking is within ½ mile of the housing development. The bill would create an exception from the above-described provision if the development either dedicates a minimum of 20% of the total number of housing units to very low, low- or moderate-income households. The bill would include findings that changes proposed by this bill address a matter of statewide concern rather than a municipal affair and, therefore, apply to all cities, including charter cities. ***February 23, 2022 - the Bill was referred to the Senate Committees on Governance and Finance and Housing. March 31, 2022 the Bill was amended and was re-referred to the Senate Committee on Housing. April 27, 2022 the Bill passed the Senate Committee on Housing by a vote 6-2 and was re-referred to the Senate Committee on Appropriations. May 24, 2022 the Bill passed off the senate Floor by a vote of 23-8. June 2, 2022 the Bill was referred to the Assembly Committees on Housing and Community Development and Local Government. June 15, 2022 the Bill was amended in the Assembly Committee on Local Government. June 30, 2022 the Bill was amended and re-referred to the Assembly Committee on Appropriations.***

AB 1695, as amended, Santiago. Affordable housing loan and grant programs: adaptive reuse projects. Current law establishes various programs and funding sources administered by the Department of Housing and Community Development to enable the development of affordable housing. This bill would provide that any notice of funding availability issued by the department for an affordable housing loan and grant program shall state that adaptive reuse of a property for affordable housing purposes is an eligible activity. The bill would define “adaptive reuse” to mean the repurposing and rehabilitation of an existing building for use as permanent or long-term residences. ***March 17, 2022 - the Bill received author’s amendments and on March 21, 2022 the Bill was Re-referred to the Assembly Committee on Housing and Community Development. April 18, 2022 the Bill received additional author’s amendments and was re-referred to committee. May 18, 2022 the Bill passed the Assembly Committee on Housing and Community Development by a vote of 11-3. May 25, 2022 the Bill passed off the Assembly Floor by a vote of 54-12. June 1, 2022 the Bill was referred to the Senate Committee on Housing. June 22, 2022 the Bill passed out of the Senate Committee on Housing by a vote of 7-0 and was referred to the Senate Committee on Appropriations.***

AB 2011, as amended, Wicks. Affordable housing and High Roads Jobs Act of 2022: streamlined ministerial approval for multifamily projects.

The Planning and Zoning Law authorizes a development proponent to submit an application for a multifamily housing development that is subject to a streamlined, ministerial approval process and not subject to a conditional use permit, if the development satisfies specified objective planning standards. The Bill would make certain housing developments that meet specified affordability and site criteria and objective development standards a use by right within a zone where office, retail or parking are principally permitted use, and would subject these development projects to one of 2 streamlined, ministerial review processes. The Bill would require a development proponent for a housing development project approved pursuant to the streamlined, ministerial review process to require, in contracts with construction contractors, that certain wage and labor standards will be met, including that all construction workers shall be paid at least the general prevailing rate of wages, as specified. The approval process established by this bill would be ministerial in nature, thereby exempting the approval of development projects subject to the that approval process from CEQA. ***March 24, 2022 the Bill was referred to the Assembly Committee on Housing and Community Development. May 19, 2022 the Bill received authors amendments and passed out of the Assembly Committee of Housing and Community Development by a vote 11-1. May 23, 2022 the Bill passed off the Assembly Floor by a vote of 48-11. June 1, 2022 the Bill was referred to the Senate Committees on Housing and Governance and Finance. June 14, 2022 the Bill was heard in the Senate Committee on Housing and received author’s amendments. June 23, 2022 the Bill was heard in the Senate Committee on Governance and Finance and on June 30, 2022 the Bill was referred to the Senate Committee on Appropriations.***

AB 2053, as amended, Lee Carrillo and Kalra. The Social Housing Act.

The bill would enact the Social Housing Act and would create the California Housing Authority, as an independent state body, the mission of which would be to produce and acquire social housing developments for the purposes of eliminating the gap between housing production and regional housing needs assessment targets. The bill will would prescribe the composition of the California Housing Authority Board, which will govern the authority. The Bill would proscribe the powers and duties of the authority and the board. ***April 24, 2022 – the Bill was referred to the Assembly Committee on Housing and Community Development. April 21, 2022 the Bill was referred to the Assembly Committee on Appropriations and on May 19, 2022 the Bill was amended and received a second reading. May 25, 2022 the Bill passed off the Assembly Floor by a vote of 47-20. June 1, 2022 the Bill was referred to the Senate Committees on Governance and Finance, Housing and Labor, Public Employment and Retirement. June 14, 2022 the Bill was amended by the author. June 30, 2022 the Bill failed passage and a reconsideration was granted.***

AB 2186, as amended, Grayson. Housing Cost Reduction Incentive Program.

The bill would establish the Housing Cost Reduction Incentive Program which would be administered by the Department of Housing and Community Development. The program would be established for the purposes of reimbursing cities and counties for the development impact fee waivers or reductions that are provided to qualified rental housing developments. Upon budget appropriation, the bill would require the Department to provide grants to applicants in an amount which is equal to 50% of the amount of the development impact fee waived or reduced for a qualified rental housing development. The bill would further require an applicant that

receives a grant under the program to use the funds solely for the purposes of which the development impact fee that was waived or reduced would have been used for. **March 23, 2022 - the Bill received author's amendments and on March 24, 2022 the Bill was re-referred to the Assembly Committee on Housing and Community Development. April 6, 2022 the Bill was re-referred to the Committee on Local Government. April 18, 2022 the Bill received additional author's amendments and was re-referred to committee. May 19, 2022 the Bill passed out of the Assembly Committee by a vote of 16-0. May 23, 2022 the Bill passed off the Assembly Floor by a vote of 74-0. June 1, 2022 the Bill was referred to the Senate Committees on Governance and Finance and Housing. June 30, 2022 the Bill passed out of Committee by a vote of 5-0 and was referred to the Senate Appropriations Committee.**

AB 2295, as amended, Bloom. Local educational agencies: housing development projects.

The bill would deem a housing development project an allowable use on any real property owned by a local educational agency, as defined, if the housing development satisfies certain conditions, including other local objective zoning standards, objective subdivision standards, and objective design review standards. The bill would deem a housing development that meets these requirements consistent, compliant, and in conformity with local development standards, zoning codes or maps and the general plan. The bill would authorize the land used for the development of the housing development to be jointly used or occupied by the local educational agency and any other party, subject to the specified requirements. **March 29, 2022 - the author amended the Bill and was re-referred to the Assembly Committee on Housing and Community Development. May 11, 2022 the Bill passed the Assembly Appropriations Committee by a vote 12-4. May 26, 2022 the Bill passed off the Assembly Floor by a vote of 50-19. June 8, 2022 the Bill was referred to the Senate Committees on Housing and Governance and Finance. June 15, 2022 the Bill passed out of the Senate Committee on Housing by a vote of 5-0. June 22, 2022 the Bill passed as amended and was re-referred to the Senate Committee on Appropriations.**

AB 2339, as amended, Bloom. Housing element: emergency shelters: regional housing need.

Existing law requires that the housing element identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and make adequate provisions for the existing and the projected needs of all economic segments of the community. The bill would revise the requirements of the housing element, as described above, in connection with zoning designations that allow residential use, including mixed use, where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The bill would delete language regarding emergency shelter standards structured in relation to residential and commercial developments and instead require that emergency shelters only be subject to specified written, objective standards. The bill would require that identified zoning designations where emergency shelters are allowed to include sites that meet at least one of certain prescribed standards. The bill would require those sites to be either (1) vacant and zoned for residential use. (2) vacant and zoned for non-residential use if the local government can demonstrate how the sites are connected to amenities and services that serve people experiencing homelessness. (3) nonvacant if the site is adequate and available for use as a shelter in the current planning period. **March 3, 2022 – the Bill was referred to the Assembly Committee on Housing and Community Development and Local Government. April 28, 2022 the author amended the bill and was referred to the Assembly Committee on Appropriations. May 18, 2022 the Bill passed the Assembly Appropriations Committee by a vote of 11-4. May 25, 2022 the Bill passed off the Assembly Floor by a vote of 55-16. The Bill was referred to the Senate Committee on Housing and on June 16, 2022 the Bill was amended and re-referred to the Senate Committee on Appropriations. June 28, 2022 the Bill was read a second time and was ordered to a third reading.**

AB 2668, as amended, Grayson. Planning and Zoning: housing: streamlined ministerial approval.

The bill would prohibit a local government agency from determining that a proposed development is in conflict with the objective planning standards, if the application materials are not included and as long as the application contains sufficient information that would allow a reasonable person to conclude that the proposed development is consistent with the objective planning standards. **March 10, 2022 - the Bill was referred to the Assembly Committees on Local Government and Housing and Community Development. March 31, 2022 the Bill received Author's Amendments and on April 4, 2022 the Bill was re-referred to the Assembly Committee on Local Government. May 16, 2022 the Bill passed on the Assembly Floor by a vote of 68-0. May 25, 2022 the Bill was referred to the Senate Committee on Governance and Finance and Housing. June 6, 2022 the Bill was amended by the author. June 14, 2022 the Bill passed out of Committee by a vote of 9-0 and was re-referred to the Senate Committee on Governance and Finance.**

June 30, 2022 the Bill was amended and passed out of the Senate Committee on Governance and Finance by a vote of 5-0.

AB 2705, as amended, Quirk-Silva. Housing: fire safety standards.

Under current law, the State Fire Marshall is required to prepare, adopt and submit building standards, as well as other fire and life safety regulations to the California Buildings Standards Commission for approval. This bill would prohibit a legislative body of a county or city from approving a discretionary entitlement, that would result in a new residential development project located within a very high fire hazard severity zone, unless the county or city finds that the residential development project will meet specified standards that would address wildfire risks. **March 17, 2022 - the Bill was referred to the Assembly Committees on Local Government and Natural Resources. April 7, 2022 the Bill received Author's amendments and on April 18, 2022 the Bill was re-referred to the Assembly Committee on Local Government and on May 19, 2022 the Bill passed out of Committee by a vote of 16-0. May 26, 2022 the Bill passed off the Assembly Floor by a vote of 73-0. June 8, 2022 the Bill was referred to the Senate Committees on Governance and Finance and Government Organization. June 22, 2022 the Bill passed out of Committee and was referred to the Senate Committee on Appropriations.**

Bills Introduced in the 2021-2022 Legislative Session, signed into law.

AB 2179, as amended, Grayson. Development Fees: deferral.

Under current law, a local agency is prohibited from imposing fees on a residential development for the construction of public improvements or facilities and requiring the payment fees until the date of the final inspection or the date the certificate of occupancy is issued or whichever comes first. The bill would prohibit a noncompliant municipality, as defined, that imposes any fees or charges on a qualified development project, from requiring the payment of fees until 20 years from the date of the final inspection or the date of the certificate of occupancy is issued or whichever comes first. **February 24, 2022 - the Bill was referred to the Assembly Committees on Local Government and Housing and Community Development. March 24, 2022 the Bill was re-referred to the Assembly Committee on the Judiciary. March 24, 2022 The Bill received author's amendments and became the Covid-19 relief: Tenancy Bill. March 28, 2022 the Bill passed the Assembly by a vote of 62-1 and on March 31, 2022 the Bill passed the Senate 31-5. The Bill was enrolled and presented to the Governor for signature and on March 31, 2022 the Bill was signed by the Governor and Chaptered by the Secretary of State.**

The new bill extends, through June 30, 2022, two key components of California's answer to the economic hardship that the Covid -19 pandemic brought upon residential landlords and tenants: **1.** Protections against eviction for nonpayment of rent, but only in cases where an applicant for emergency rental assistance to cover the unpaid rent was pending as of March 31, 2022; and **2.** Preemption of additional local protections against eviction for nonpayment of rent that were not in place on August 19, 2020.

2021-2022 Bills - that failed to meet Key Legislative Deadlines

SB 1292, as amended, Stern. Accessory dwelling units: setbacks.

The current State Planning and Zoning Law, provides for the creation of accessory dwelling units – by local ordinance, or if a local agency has not adopted an ordinance, by ministerial approval, in accordance with specified standards and conditions. Existing law prohibits a local agency's accessory dwelling unit ordinance from imposing a setback requirement of more than 4 feet from the side and rear lot lines for an accessory dwelling unit that is not converted from an existing structure or a new structure constructed in the same location and to the same dimensions of the existing structure. The bill would remove this prohibition on a local agency's accessory dwelling unit ordinance and would instead provide that the rear and side yard setback requirements for accessory dwelling units may be set by the local agency. The bill would authorize an applicant of an accessory dwelling unit to submit a request for an alternative rear and side yard setback requirement, if the local agency's setback requirements make the building of the unit infeasible. The bill would also prohibit any rear and side yard setbacks requirements previously established to be greater than those in effect on January 1, 2020. The bill further stipulates that if the local agency has not established an accessory dwelling unit ordinance as of January 1, 2020, the applicant rear and side yard setback requirement is 4 feet. **March 16, 2022 - the Bill received author's amendments and was Re-referred to the Senate Committee on**

Housing. The Bill is set for a hearing on March 24, 2022. The Bill's hearing was canceled at the request of the author.

SB 1369, as introduced, Wieckowski. Adaptive reuse projects: by-right: funding.

This bill would make an adaptive reuse project a use by right in all areas, regardless of zoning. The bill defines "adaptive reuse project" as any commercial, industrial, public or office building that has 25% occupancy or less which will be converted into a residential development project. The bill would define "use by right" to mean that the city or the County's review of the adaptive reuse project may not require a conditional use permit, planned unit development permit, or other discretionary city or county review or approval that would constitute a "project" for purposes of CEQA, as specified. Therefore, adaptive reuse projects would not be subject to CEQA. **March 9, 2022 - the Bill was referred to the Senate Committees Government and Finance, Housing and Environmental Quality. March 22, 2022 the Bill is set for a hearing for March 31, 2022. The Bill's hearing was canceled at the request of the author.**

SB 1466, as introduced, Stern. Affordable Housing and Community Development Investment Program.

The bill would establish the **Affordable Housing and Community Investment Program**, which would be administered by the Affordable Housing and Community Development Investment Committee. The bill would authorize a city, county, affordable housing authority, community revitalization and investment authority or a city, joint power agency, or a combination of these entities to apply to the Affordable Housing and Community Development Investment Committee for participation in the program. The bill would authorize the Committee to approve or deny plans for projects meeting specific criteria. The bill would also authorize certain local agencies to establish an affordable housing and community development investment agency and authorize an agency to apply for funding under the program and issue bonds, as provided, to carry out a project under the program. **March 9, 2022 - the Bill was referred to the Senate Committees on Government and Finance and Housing.**

AB 1674, as introduced, Voepel. Building Standards: photovoltaic requirements: accessory dwelling units.

The bill would prohibit an accessory dwelling unit from being considered a newly constructed building for the purposes of the California Energy Code relating to the photovoltaic requirements for newly constructed buildings that are classified as a low-rise residential building. This bill would also require the Energy Commission, to study exempting accessory dwelling units from the specified photovoltaic requirements and make their recommendations to the California Building Standards Commission in time for the consideration and adoption for the next California Building Standards Code adoption cycle. **January 27, 2022 - the Bill was referred to the Assembly Committees on Housing and Community Development and Natural Resources.**

AB 1910, as introduced, Garcia. Publicly owned golf courses: conversion: affordable housing.

The bill would require the Department of Housing Community Development to administer a grant program for local agencies that would enter into a development agreement for the conversion of golf courses owned by the local agency for the purposes of housing and publicly accessible open space. The bill would require the Department to award grants based on the number of affordable units that the local agency proposes to construct as part of the conversion project. **February 18, 2022 - the Bill was referred to the Assembly Committees on Housing and Community Development and Local Government. April 6, 2022 the bill was set for its first hearing. The hearing was canceled at the request of the author. May 11, 2022 the Bill was referred to the Suspense File. May 19, 2022 the Bill is being held under submission.**

AB 1976, as amended, Santiago. Planning and zoning: housing element compliance: very low and lower-income households.

Existing law requires the Department of Housing and Community Development (HCD), in consultation with each council of governments, to each region's existing and projected housing need, and requires each council of governments, or the department for cities and counties without a council of governments to adopt a final regional housing need plan that allocates a share of the regional housing need to each city and county. The bill would authorize HCD, after notifying the City or County of the violation of the housing element provision and before notifying the Attorney General, either to complete the rezoning to accommodate 100% of the allocated need for housing for very low and lower income households on behalf of local government within the counties of Imperial, Los Angeles, Orange, Riverside or Ventura that failed to complete that rezoning by the

required deadline, or to impose administrative civil penalties upon the local government of up to \$10,000 per day until the local government is longer in violation of state law or HCD decides to refer the violation to the Attorney General. The bill would also authorize the court to order the appointment of an agent of the court to bring the jurisdiction's housing element into substantial compliance, if the jurisdiction has not brought its housing element into substantial compliance after 3 months following the imposition of the initial fine. **March 17, 2022 - the Bill was referred to the Assembly Committees on Housing and Community Development and Local Government. March 21, 2022 the Bill received authors amendments and was re-referred to the Assembly Committees on Housing and Community Development and Local Government.**

AB 2218, as amended, Quirk Silva. California Environmental Quality Act: Standing: Proposed infill housing projects.

The California Environmental Quality Act (CEQA) requires a lead agency, as defined, to prepare, or cause to be prepared and certify the completion of an environmental impact report on a project that it proposes to carry out or approve that may have a significant effect on the environment or to adopt a negative declaration if it finds that the project will not have that effect. The bill would provide that a person does not have standing to bring an action or proceeding to attack, review, set aside, void or annul acts or decisions of a public agency undertaken to implement a project involving the development of housing at an infill site, unless the person resides within 20 miles of the project. **February 24, 2022 - the Bill was referred to the Assembly Committees of Banking and Finance and Privacy & Consumer Protection. March 9, 2022 the author amended the Bill and the Bill was re-referred to the Assembly Committee on Banking and Finance. March 17, 2022 the Bill was re-referred to the Assembly Committee on Rules – pursuant to Rule 96.**

AB 2428, as introduced, Ramos. Mitigation Fee Act: fees for improvements: timeline for expenditures.

The Mitigation Fee Act requires a local agency, that establishes, increases or imposes a fee as a condition of approval of a development project to determine a reasonable relationship between the fee's use and the type of development project for which the fee is imposed. The Act imposes additional requirements for fees imposed that provide for the improvement to be constructed and that the fees are deposited in a separate capital facilities account or fund. The bill would require a local agency to impose that a project applicant to deposit fees in an escrow account for specified project improvements. The requirement will be imposed as a condition to receiving a conditional use permit or equivalent development permit. The fees must be expended within 5 years of the deposit. **March 3, 2022 - the Bill was referred to the Assembly Committees on Local Government and Housing and Community Development.**

AB 2485, as introduced, Choi. California Environmental Quality Act: exemption: emergency shelters and supportive housing.

CEQA Law, currently exempts from its environmental review numerous categories of projects. The bill would exempt from the requirements of CEQA, emergency shelters and supportive housing for the homeless population. **March 10, 2022 - the Bill was referred to the Assembly Committees on Natural Resources and Housing and Community Development.**

AB 2719, as introduced, Fong. California Environmental Quality Act: exemptions and highway safety.

CEQA Law, currently exempts from its environmental review numerous categories of projects, including emergency projects undertaken, carried out or approved by a public agency which will repair, maintain, or restore an existing road. The bill would exempt from the requirements of CEQA highway safety improvement projects, as defined by the bill and undertaken by the Department of Transportation or a local agency. **March 10, 2022 - the Bill was referred to the Assembly Committee on Natural Resources. April 5, 2022 the Bill was set for its first hearing. The hearing was canceled at the request of the author.**

AB 2762, as introduced, Bloom. Housing: parking lots.

Under current State Planning and Zoning Law, each county and city are required to adopt a comprehensive, long-term general plan for the physical development of the county or city and specified land outside its boundaries. The general plan must include mandatory elements, including a housing element. This bill would allow local agencies to build affordable housing on parking lots that serve public parks and recreational facilities. **February 18, 2022 - the Bill was introduced and a hearing has not been set for the Bill.**



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: RHNA Reform Comment Letter
Contact: Christopher Gray, Deputy Executive Director, cgray@wrcog.us, (951) 405-6710
Date: August 1, 2022

Requested Action(s):

1. Authorize WRCOG's Executive Director to submit the provided comment letter regarding future RHNA allocation methodologies to SCAG.

Purpose:

The purpose of this item is to provide information regarding the Regional Housing Needs Assessment (RHNA) reform process and share the comment letter which WRCOG will submit to SCAG for review and consideration.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #1 - Serve as an advocate at the regional, state, and federal level for the Western Riverside subregion.

Background:

The Regional Housing Needs Assessment (RHNA)

The RHNA is mandated by the State Housing Law as part of the periodic process of updating local Housing Elements of the General Plan. The RHNA process is used to determine how many homes, at various affordability levels, are needed for a particular planning period; this process is repeated every eight years. The current 6th cycle planning period, covering October 2021 through October 2029, received a need of 1,341,827 housing units for the SCAG region. The number of units is determined by the California Department of Housing and Community Development (HCD), representing both existing and projected need, and is distributed by SCAG amongst the 197 jurisdictions within the region.

SCAG is then tasked with developing a methodology for distributing those units in a way that meets all statutory requirements and is equitable across a diverse range of jurisdictions. Ultimately, the methodology recently adopted resulted in an allocation of 167,351 units for the entire Riverside County. Approximately two-thirds of those units are within the WRCOG subregion. Allocations for WRCOG cities range from less than 200 units to over 18,000 units, and over 40,000 units for the entire unincorporated Riverside County.

RHNA Reform: RHNA's 6th Cycle has led to requests for SCAG to pursue reform of the RHNA process. SCAG has received feedback from jurisdictions and stakeholders regarding several issues related to

HCD's regional determination methodology, the use of land planning factors in the SCAG RHNA methodology, and basis for RHNA appeals.

SCAG is soliciting input on these topics through August 12, 2022. Comments pertaining to the HCD regional determination will be considered in SCAG's recommendation to HCD, as reviewed and approved by the SCAG Regional Council. Comments related to SCAG's allocation methodology and other topics within SCAG's purview will be considered and will influence the process for the next RHNA cycle.

State RHNA Reform & RHNA Audit: Assembly Bill 101 (2019) requires HCD to "develop a recommended improved RHNA allocation process and methodology that promotes and streamlines housing development and substantially addresses California's housing shortage." This process is inclusive of stakeholders throughout the state, not just the SCAG region, and will presumably include workshops and other means of gaining insight, although the state has not yet announced opportunities regarding such activities.

Once HCD has received feedback from stakeholders across the state, it will prepare a report on RHNA reform and develop recommendations, presumably based on feedback received, and present those recommendations to the State Legislature by December 31, 2022. This call for RHNA reform is of particular relevance, as a recent audit report of the RHNA process was released earlier this year.

In October 2021, the California State Joint Legislative Audit Committee approved an emergency audit to examine HCD's regional determination process. The request for an audit was based on an assertion that the public had limited information on the formula that HCD uses to calculate the RHNA regional determination numbers, and cited confusion and mistrust among regional planning bodies and jurisdictions, and the need for an independent and objective review of the process. While the audit report (Attachment 1) did not look at the SCAG region specifically, several key findings are worth highlighting; these include:

- HCD made several errors with data calculations and verification for the needs assessment which resulted in a reduced amount of housing needs in the assessment for at least two of the regions studied;
- HCD could not demonstrate that it followed work group recommendations when it should have considered a variety of factors, including jobs and housing balance and loss of units during a state of emergency;
- HCD did not adequately support its adjustment to the needs assessments to address vacancy rates, despite the significant effect it has in the overall needs assessment; and
- HCD's review of comparable regions were inconsistent and lacked a formal process for such a review.

The conclusion perhaps most surprising is that these key factors in fact resulted in an under-allocation rather than an over-allocation of units. Furthermore, while the report cannot speak directly to the inaccuracies or errors potentially made in the allocation of units to the SCAG region, the information gleaned from this report at a minimum calls into question the process and methodology HCD used to determine the regional allocations. Attachment 1 provides a copy of the Statewide RHNA Audit which documents these conclusions.

Advocacy for the Western Riverside County Subregion

State RHNA reform: It is WRCOG's position that the California State Auditor's report of the RHNA allocation process provides the insight and direction needed for HCD to develop recommendations for an improved process. Because of this, combined with the additional comments and/or recommendations SCAG will be producing through review by the Community, Economic and Human Development Committee, and approval by the Regional Council, WRCOG is not planning on submitting comments to the State at this time and will continue to monitor the situation to determine the best opportunity to engage on this topic in conjunction with SCAG and other regional partners.

SCAG RHNA reform: SCAG has also requested that agencies submit any comments regarding the RHNA allocation process. The RHNA allocation process is the method by which SCAG allocates units to different jurisdictions in the SCAG region once HCD submits its Regional Determination, which is the number of units the SCAG region is required to address through the RHNA process. WRCOG prepared a comment letter (Attachment 2) to provide input into future RHNA allocations. This letter makes three recommendations. First, it recommends that SCAG prioritizes the allocation of units consistent with adopted plans and policies instead of focusing on an equitable distribution throughout the SCAG region. Second, it endorses the use of objective criteria such as High Quality Transit Areas (HQTAs) which were employed by SCAG in the previous RHNA allocation process. WRCOG has relatively few HQTA's as compared to Los Angeles and Orange County. Finally, the letter recommends SCAG revisit its methodology and assumptions to determine persons per household for Western Riverside County. As noted in the letter, SCAG's assumptions regarding the number of persons per household for future periods are much lower than current data, which results in an over-projection of units associated with future population growth. When taken together, these three recommendations have the potential to reduce future RHNA allocations to the WRCOG subregion.

Prior Action(s):

None.

Fiscal Impact:

Staff time and expenses related to the preparation and review of this comment letter are included in Fund 210 (Local Transportation Fund) under the Transportation & Planning Department Budget related to Regional Planning Program Activities.

Attachment(s):

[Attachment 1 - RHNA Audit Report](#)

[Attachment 2 - RHNA Reform Comment Letter](#)

Attachment 1

Regional Housing Needs
Assessments – State Auditor Report
March 2022



Regional Housing Needs Assessments

The Department of Housing and Community Development Must Improve Its Processes to Ensure That Communities Can Adequately Plan for Housing

March 2022

REPORT 2021-125





CALIFORNIA STATE AUDITOR

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March 17, 2022
2021-125

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As directed by the Joint Legislative Audit Committee, my office evaluated the Regional Housing Needs Assessment (needs assessment) process that the Department of Housing and Community Development (HCD) uses to provide key housing guidance for the State's local governments. The availability of sufficient housing is of vital statewide importance, and HCD's needs assessments are what allow jurisdictions to plan for the development of that housing. Overall, our audit determined that HCD does not ensure that its needs assessments are accurate and adequately supported.

In reviewing the needs assessments for three regions, we identified multiple areas in which HCD must improve its process. For example, HCD does not satisfactorily review its needs assessments to ensure that staff accurately enter data when they calculate how much housing local governments must plan to build. As a result, HCD made errors that reduced its projected need for housing in two of the regions we reviewed. We also found that HCD could not demonstrate that it adequately considered all of the factors that state law requires, and it could not support its use of healthy housing vacancy rates. This insufficient oversight and lack of support for its considerations risks eroding public confidence that HCD is informing local governments of the appropriate amount of housing they will need.

HCD's needs assessments also rely on some projections that the Department of Finance (Finance) provides. While we found that most of Finance's projections were reasonably accurate, it has not adequately supported the rates it uses to project the number of future households that will require housing units in the State. Although these household projections are a key component in HCD's needs assessments, Finance has not conducted a proper study or obtained formal recommendations from experts it consulted to support its assumptions in this area. Finance intends to reevaluate its assumptions related to household growth as more detailed 2020 Census data becomes available later in the year, but without such efforts, Finance cannot ensure that it is providing the most appropriate information to HCD.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael Tilden". The signature is written in a cursive, flowing style.

MICHAEL S. TILDEN, CPA
Acting California State Auditor

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CONTENTS

Summary	1
Introduction	3
HCD's Housing Needs Assessment Process Lacks Sufficient Reviews and Support	11
Recommendations	22
Finance Provides Reasonable Population Projections, but It Has Not Provided Sufficient Support for Its Household Formation Projections	25
Recommendations	29
Appendix A	
HCD Housing Needs Assessments We Reviewed	31
Appendix B	
Scope and Methodology	35
Responses to the Audit	
Business, Consumer Services and Housing Agency	37
California State Auditor's Comments on the Response From the Business, Consumer Services and Housing Agency	41
Department of Finance	43
California State Auditor's Comment on the Response From the Department of Finance	45

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SUMMARY

The Legislature recognizes that the availability of housing is of vital statewide importance and that the State and local governments have a responsibility to facilitate the development of adequate housing. State law requires the Department of Housing and Community Development (HCD) to conduct assessments to determine the housing needs (needs assessments) throughout regions in the State. The needs assessments rely on projections of future population and households developed by the Department of Finance (Finance). HCD is required to consider certain factors identified in state law and then can adjust the needs assessments for any of the factors. For example, it makes an adjustment to achieve a healthy vacancy rate in the housing market and an adjustment to reduce the number of overcrowded households. Regions use the needs assessments to plan for additional housing to accommodate population growth and address future housing needs.

HCD's Housing Needs Assessment Process Lacks Sufficient Reviews and Support

Page 11

HCD does not have a formal review process for the data it uses to determine its needs assessments. As a result, the needs assessments for two of three regions we reviewed included errors. One data error reduced a region's needs assessment by nearly 2,500 housing units. HCD also did not demonstrate that it adequately considered certain factors when creating the needs assessments of the three regions we reviewed. For one of those factors, the healthy vacancy rate, HCD did not perform a formal analysis to adequately support its assumptions. HCD's insufficient oversight of its process and the lack of adequate documentation supporting the healthy vacancy rate risks eroding public confidence in HCD's ability to address the State's housing needs.

Finance Provides Reasonable Population Projections, but It Has Not Provided Sufficient Support for Its Household Formation Projections

Page 25

Finance's projections of the statewide future population are reasonably accurate, but it did not sufficiently support its projections of the number of future households. To calculate the household projections, Finance identifies rates at which it expects individuals in different age groups to form new households and applies those rates to its population projections. Although Finance worked with HCD to solicit some advice from experts when it established these rates, it did not conduct a formal study or receive clear recommendations to support them. As a result, Finance cannot ensure that it is providing the most appropriate information for HCD to include in its needs assessment process.

Finance stated that it intends to reevaluate its assumptions related to household growth after it reviews 2020 Census data when those data become available later this year.

Summary of Recommendations

Legislature

To provide HCD additional clarity and guidance in conducting its vacancy rate adjustments, the Legislature should amend state law to clarify whether HCD should continue to use a healthy vacancy rate that includes both rental and owned housing or whether it should determine and use separate healthy vacancy rates for owned housing and rental housing.

HCD

To ensure that its needs assessments are accurate and do not contain unnecessary errors, by June 2022 HCD should institute a process to ensure that its staff performs multiple reviews of data in its assessments.

To demonstrate that its needs assessments are complete and address all relevant factors, by September 2022 HCD should establish a formal process to document its consideration of all factors required by state law in its needs assessments.

To ensure that it adequately supports the vacancy rate adjustments it makes to needs assessments, by February 2023 HCD should perform a formal analysis of healthy vacancy rates and historical trends to inform those adjustments.

Finance

To ensure that the household formation rates that it provides HCD are appropriate, Finance should, by February 2023, conduct a comprehensive review of its assumptions about the household formation rates it uses in projections, and it should document that review.

Agency Comments

HCD and Finance agreed with our recommendations and plan to implement them over the next year.

Introduction

Background

As part of the Legislature's efforts to ensure that the State is planning for the construction of enough homes to meet its housing needs and that local governments are facilitating that development, state law requires the Department of Housing and Community Development (HCD) to conduct periodic housing needs assessments to determine existing and projected housing needs throughout California. HCD fulfills its responsibilities under state law by creating Regional Housing Needs Assessments (needs assessments). As Figure 1 shows, HCD provides the needs assessments to councils of governments, which we describe in the text box, across the State and directly to counties that are not in such a council. Figure 2 provides an overview of the councils of government in the State and also shows counties that are not part of a council. After a council of governments receives its needs assessment from HCD, it then must allocate the region's housing needs to the cities and counties within its boundaries. For counties without a council of governments, HCD provides allocations to those counties as well as to the cities within them.¹ Cities and counties must then develop plans to accommodate the existing and projected housing need. HCD performs needs assessments every five to 11 years. HCD does not complete all assessments at the same time and does not always cover the same period, because it attempts to align the needs assessment process with other planning processes, such as regional transportation planning. The three needs assessments that we reviewed are those of the Santa Barbara County Association of Governments (Santa Barbara Association), the Sacramento Area Council of Governments (Sacramento Council), and Amador County.

Definition of Council of Governments

A voluntary association, generally of county and city governments, created by a joint powers agreement.

Source: State law and a council of governments' website.

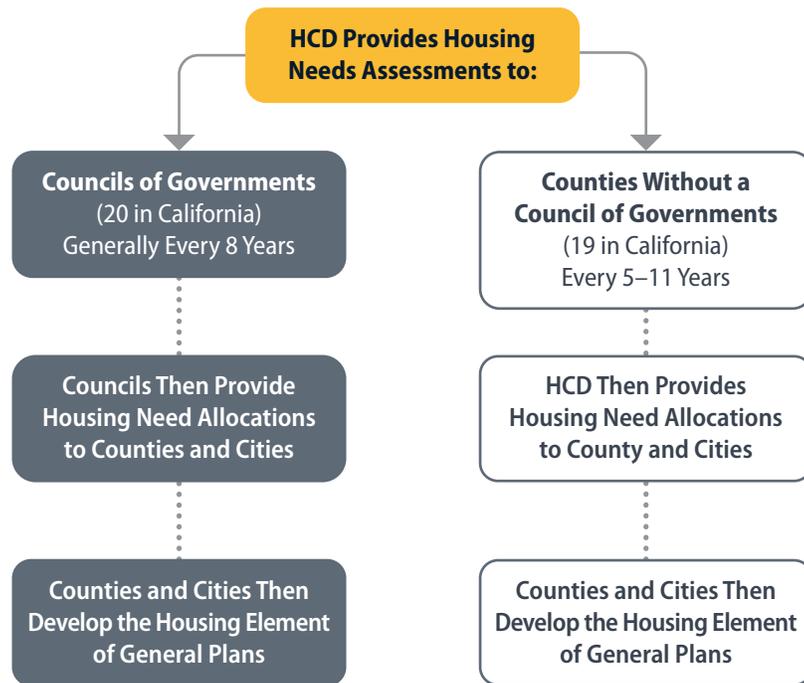
Needs Assessment Components

State law requires HCD to use population projections developed by the Department of Finance (Finance) when it completes the needs assessments. Finance factors into its projections multiple sources of information, including data from the U.S. Census Bureau (Census) and records of driver's licenses, births and deaths, school enrollments, and tax filings. Finance provides state- and county-level population projections to assist state, regional, and local planning, among other purposes. Finance also projects the number of future households, based on the population projections

¹ Counties that receive their assessments and allocations directly from HCD represent just 3 percent of the State's population.

and the percentage of people in the population who are expected to form their own households in the future, which is known as the household formation rate.

Figure 1
HCD's Housing Needs Assessments Inform County and City Housing Plans



Source: State law and HCD housing needs assessments.

Table 1 describes the factors that state law requires HCD to consider in its needs assessments, including vacancy rates. State law requires HCD to consider vacancy rates in existing housing and the vacancy rates for healthy housing markets when developing the needs assessments. A low supply of housing can result in low rental vacancy rates, which in turn can lead to housing price increases. Therefore, HCD adjusts its needs assessments so that housing markets can achieve a healthy vacancy rate. In some cases, that adjustment will add to the number of housing units HCD determines a region needs so that the region can obtain a healthy vacancy rate. State law specifies that the minimum vacancy rate for a healthy rental housing market is 5 percent, but the law does not define the healthy vacancy rate for owned housing.

Figure 2
Most California Counties Have a Council of Governments That Receives Needs Assessments From HCD



Source: HCD housing needs assessment letters.

Table 1
Factors HCD Must Consider in Its Assessments

FACTOR	DESCRIPTION
Anticipated Population Growth	Projection of future population growth in the region.
Household Formation Rate	The rate at which individuals form new households in the region.
Household Size	The number of people per household in the region.
Vacancy Rates	The percentage of homes available for rent or sale compared to the total number of housing units, less vacation and seasonal homes.
Overcrowding	The percentage of households that have more than one resident per room in a housing unit.
Replacement Needs	Replacement of housing units lost during the planning period, such as because of deterioration.
Cost-Burdened Households	The percentage of households that are paying more than 30 percent of their income on housing costs.
Units Lost to Emergencies	The loss of housing units during a state of emergency declared by the Governor, such as in wildfires, if the lost units have not yet been rebuilt or replaced.
Jobs/Housing Balance	The relationship between the number of jobs in a region and the number of housing units in that same region.
Other Characteristics	Other characteristics of the composition of the projected population.

Source: State law, the Census website, HCD needs assessments, HCD work group reports, and interviews with HCD staff.

Note: State law does not require HCD to consider these factors for its needs assessments in counties that do not have a council of governments; however, HCD's practice is to do so.

State law also requires HCD to adjust its needs assessments to account for long-term housing challenges, such as overcrowding, which occurs when a housing unit has more than one resident per room. The Legislature added this overcrowding factor to the needs assessment process in 2017. HCD must also consider cost-burdened households, which are households that pay more than 30 percent of their income for housing costs. When it determines it is appropriate to do so, HCD includes in its assessments adjustments for cost burden and overcrowding. Among the sources HCD uses to determine these adjustments is data that state law requires councils of governments to provide. The councils provide data comparing the cost burden and overcrowding for their respective regions with that of other comparable regions in the United States. HCD then uses this information to calculate adjustments for each council of governments' needs assessment. Table 2 shows a hypothetical example of how HCD incorporates adjustments for the various factors to determine the number of housing units in its needs assessments. Appendix A shows the three needs assessments that we reviewed.

Table 2
Housing Needs Assessments Contain Many Factors and Adjustments

<i>HYPOTHETICAL EXAMPLE OF HCD NEEDS ASSESSMENT CALCULATIONS</i>		
	FACTOR/SOURCE	PROJECTED CALCULATION
JUNE 2020–JUNE 2028 (8 YEARS)	8-year Population Projection (Finance)	1,500,000
	– Group Quarters Population (Finance)*	– 35,000
	Population Needing Housing (Finance)	1,465,000
	<i>Household Formation Rate Adjustment (Finance)†: 36.6% average</i>	
	Projected Households (Finance)	540,000
	+ Vacancy Rate Adjustment (HCD): 2.2%	11,900
	+ Overcrowding Adjustment (HCD): 0.6%	3,200
	+ Replacement Needs Adjustment (HCD): 0.5%	2,700
	Units Lost to Emergencies (HCD)‡	—
	Jobs/Housing Balance (HCD)‡	—
	– Occupied Units (Finance)	– 480,500
	Subtotal	77,300
	+ Cost Burden Adjustment (HCD)§: 0.55%	3,100
	Total Needs Assessment	80,400
	Housing Units	

Source: Auditor review of HCD housing needs assessments.

* This reduction includes individuals housed in prisons and in college dormitories.

† The household formation rate represents the likelihood that individuals in the region’s projected population will head their own households. Finance uses different household formation rates for different age groups, which we have simplified for illustrative purposes here.

‡ Factors that state law requires HCD to consider, but that it did not include as an adjustment in the needs assessments we reviewed.

§ HCD makes the cost burden adjustment only after applying all the other adjustments.

Finally, state law requires HCD to consider housing units that communities will need to plan to replace. Some housing units become uninhabitable during the future period covered by the assessments, such as housing lost due to damage, deterioration, and house or apartment building fires. State law requires HCD to review housing replacement needs, and HCD does so by obtaining from Finance the number of housing units a council of governments or county has lost over the past 10 years. HCD then determines the rate at which the region loses housing units and makes an adjustment in the needs assessment to replace those houses. In response to recent wildfires that have destroyed a significant number of houses, the Legislature added the requirement in 2018 that HCD must also consider any housing recently lost during a state of emergency that the Governor declared. Similar to the cost burden factor discussed

above, state law requires councils of governments to provide data to HCD on housing lost during a state of emergency for consideration in the needs assessments.

Local Actions After HCD Completes a Needs Assessment

After HCD makes a final determination for a needs assessment, state law requires the council of governments to create housing needs allocations for the cities and counties within its region. The council, in consultation with HCD, must develop a proposed methodology for distributing the allocation. The council of governments must conduct a survey and ensure public participation when developing the methodology. The council of governments establishes a draft allocation and then may hear appeals of the allocation, if any are raised. It then must make the allocation final and adopt it.

State law requires local governments, such as cities and counties, to create plans to meet housing needs. Local governments must adopt a general plan, which is a blueprint for meeting the community's long-term vision for the future. Within the general plans, state law requires local governments to include a housing element, which contains an analysis of existing and projected housing needs in their communities. Cities and counties must state their goals, policies, and programs related to the development of housing, to accommodate projected housing needs allocated by their council of governments or HCD. The community, through the housing element, must attempt to meet these housing needs, such as by changing the zoning on specific parcels to allow residential development.

Needs Assessments Can Be Contentious but Are a Critical Component of Addressing Housing Challenges

Some stakeholders have criticized the needs assessment process and HCD's needs assessments. For example, some homeowners and advocacy organizations believe that HCD's needs assessments have produced higher numbers of housing needs than are reasonable. Changes to state law that became effective in January 2019 allow HCD to account for present unmet housing needs in addition to future housing needs. Potentially as a result of these statutory changes, some regions received housing needs allocations that are more than double the amount of their previous allocations.

We are aware of two lawsuits that challenge HCD's process, including one that alleges that HCD did not consider all factors as required by state law. In one lawsuit, the Orange County Council

of Governments, which is independent from the larger Southern California Association of Governments, sued HCD, alleging that HCD failed to use the appropriate population forecast, failed to appropriately evaluate household overcrowding and cost burden rates, and used unreasonable vacancy rates. In the other lawsuit, several interested individuals and two nonprofit corporations filed a lawsuit alleging that HCD failed to consider data regarding the relationship between jobs and housing in its assessment for the Association of Bay Area Governments, which is the San Francisco Bay Area council of governments. Both lawsuits are pending final resolution. To avoid interference, we did not review the needs assessments for either of the councils involved in these lawsuits as part of this audit.

The needs assessments affect the planning for housing availability across the State and are an important but sometimes contentious component in addressing California's housing crisis. Housing availability and affordability has become a key economic issue, as the Legislative Analyst's Office (LAO) reported in 2019. The LAO noted that the significant shortage of housing, particularly within coastal communities, contributed to higher housing costs for Californians. The LAO also noted that high housing costs increase the State's poverty rate and, in particular, put low-income Californians at risk of instability and homelessness. As discussed above, the State's role in identifying existing and future housing needs to guide the housing planning process is under public scrutiny. Determining accurate, appropriate, and defensible housing needs is a key step in facilitating state and local efforts to plan for housing development.

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HCD's Housing Needs Assessment Process Lacks Sufficient Reviews and Support

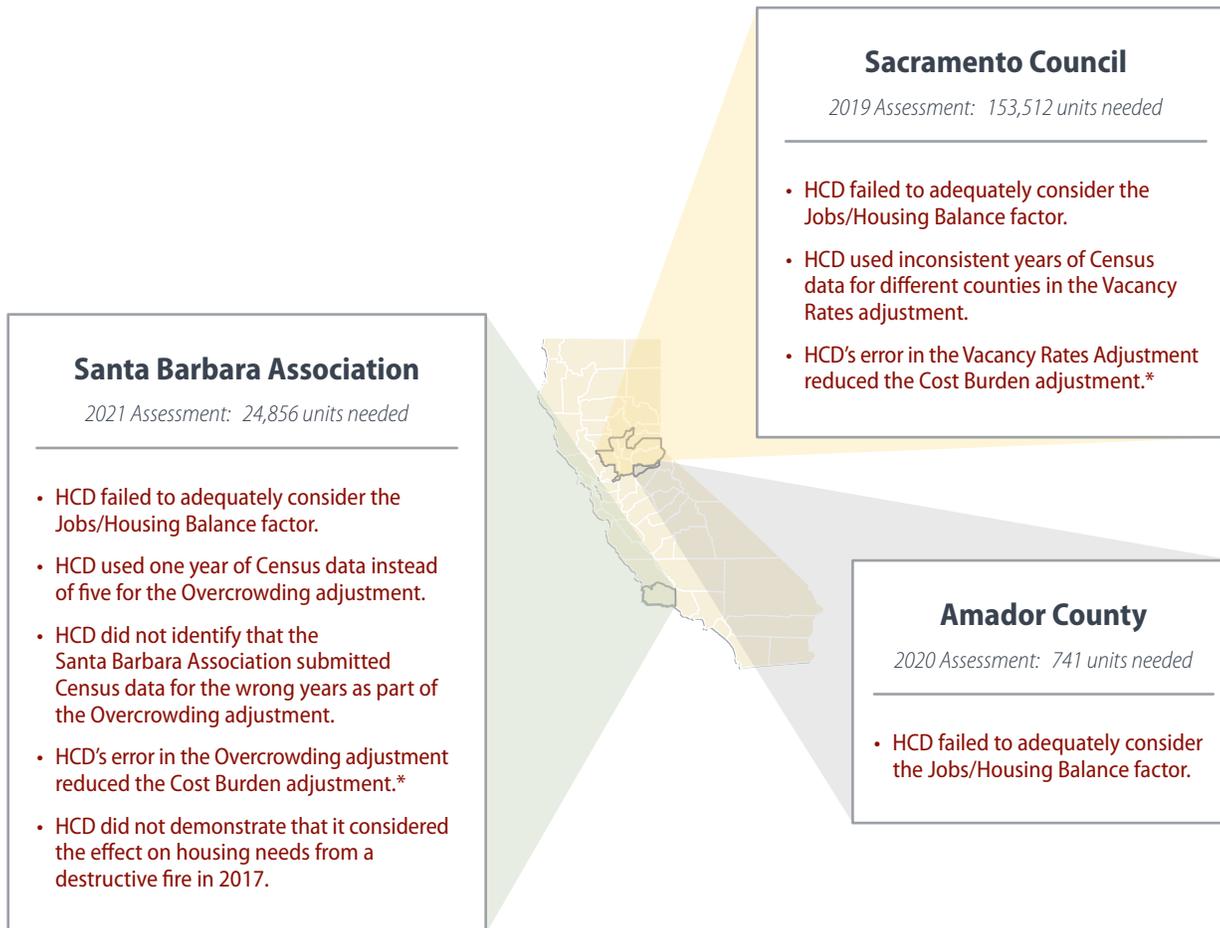
Key Points

- HCD made several errors when entering data into calculations for its needs assessments, which reduced the amount of housing needs in the needs assessments for two of the three regions we reviewed. HCD does not have a sufficient management review process to ensure that it identifies such errors before finalizing needs assessments. Without effective review processes, HCD may be making similar errors in needs assessments for other councils of governments.
- HCD could not demonstrate that it followed work group recommendations when it considered the balance between jobs and housing, and did not maintain consistency in its consideration of housing destroyed during a state of emergency, when it produced the needs assessments for the three regions we reviewed. In at least one needs assessment, the omission led HCD to understate housing needs by not accounting for units that had been destroyed in a wildfire.
- HCD did not adequately support its adjustment to the needs assessments to address vacancy rates for the councils of governments we reviewed. Despite the significant effect that HCD's vacancy rate adjustments have on needs assessments, it has not completed a thorough analysis to determine whether it used the most appropriate value in its calculations.
- HCD's reviews of comparable regions selected by councils of government have been inconsistent because the department does not have a formal process for such reviews. As a result, it did not identify a problematic proposal from a region and inappropriately reduced its needs assessment.

HCD Has Made Errors When Completing Its Needs Assessments Because It Does Not Sufficiently Review and Verify Data It Uses

HCD does not have an adequate review process to ensure that its staff members accurately enter data that it uses in the needs assessments. As Table 1 shows, state law requires HCD to consider a variety of information for its needs assessments for councils of governments, including population projections, housing vacancy rates, and income data. HCD staff members enter the data the department obtains from various sources into a spreadsheet for each council of governments and uses the information to determine the housing needs. However, HCD does not sufficiently review its staff member's data entries for accuracy. As Figure 3 shows, we noted data entry errors in two of the three assessments we reviewed. We discuss the other issues presented in Figure 3, including an inadequate consideration of the relationship between jobs and housing, in the following section.

Figure 3
HCD's Errors and Omissions Understated the Needs Assessments for Multiple Regions



Source: Analysis of state law, HCD needs assessments, and HCD's 2010 SB 375 implementation work group report.

Note: We were able to determine the impact on needs assessments from some, but not all errors and omissions presented in this figure. For example, HCD did not collect data on the jobs/housing balance, and therefore we could not quantify the effect of HCD not considering this factor. We discuss selected errors' impacts on HCD's needs assessments on pages 13 and 22 in the report text.

* Because HCD makes the cost burden adjustment after applying the other adjustments, errors that increase or reduce other adjustments also increase or reduce the cost burden adjustment.

One data entry error resulted in a lower, inaccurate number of needed housing units in the Santa Barbara Association's needs assessment. HCD's needs assessment letter explained that its overcrowding adjustment relied on Census estimates from five years of survey data. However, HCD had only used Census data from a one-year estimate when determining the overcrowding adjustment, which is both less accurate and inconsistent with other steps in the calculation that used the five-year estimates. HCD explained that staff members entered data from the wrong table on the Census website. Had HCD used the five-year estimates as

it intended for this step in its calculation, Santa Barbara's needs assessment would have included 1,338 more housing units, or about 5 percent more than the inaccurate assessment HCD provided to the Santa Barbara Association.

HCD made a similar error when using Census estimates to adjust the Sacramento Council's assessment. It had intended to use the 2013–2017 Census vacancy estimate for all the counties within the Sacramento Council, but it mistakenly entered the 2012–2016 estimate for Sacramento County. This error reduced the Sacramento Council's needs assessment by 2,484 units. Although this number represents a small portion of the region's overall needs assessment of more than 153,000 units, it still represents homes for individuals and families for which the Sacramento Council needs to plan to accommodate.

Because HCD did not verify the information the Santa Barbara Association submitted for its needs assessment, it made an additional error. HCD incorporates into the needs assessments some information it receives from the councils of governments, such as data on overcrowding. The Santa Barbara Association submitted data on comparable regions' overcrowding rates using the 2014–2018 Census data, which HCD then incorporated into its overcrowding calculation. However, HCD had intended for its calculation to incorporate 2015–2019 data. Although this particular error was not large, it was in addition to the other errors in the assessments we reviewed, as discussed above. It concerns us that HCD does not have a formal review process to ensure that these important housing needs assessments are as accurate as possible.

.....

HCD does not have a formal review process to ensure that these important housing needs assessments are as accurate as possible.

.....

We identified these errors, which would be difficult to detect in documentation supporting HCD's needs assessments, by comparing the data in the needs assessments to the correct source documents. Therefore, we expected that HCD would have a robust process for dedicated reviewers and management to verify that staff members retrieve and enter the correct data in the spreadsheets. However, HCD told us that its primary process for identifying errors in its needs assessments is to send a draft assessment to each council of governments for review rather than to have HCD supervisors or other HCD staff members review the drafts.

HCD's reliance on the councils of governments for checking the accuracy of the needs assessments is problematic. As we discuss in the Introduction, the needs assessment process can be contentious and draws attention from numerous stakeholders. Therefore, some councils of governments may be reluctant to propose changes or corrections to their needs assessments that increase their own housing needs. In fact, two of the errors we identified inaccurately lowered the needs assessments, but HCD stated that neither the Santa Barbara Association nor the Sacramento Council notified HCD of the errors, and no record we reviewed indicated whether the two councils of governments noticed the errors at all.

When we brought these concerns to HCD's attention, its deputy director of housing policy development (housing policy deputy) stated that the department plans to conduct and document supervisor reviews of its needs assessments for its next planned round of assessments in 2023. It is crucial that HCD do so to ensure that councils of governments plan for the appropriate amount of housing and to maintain public confidence in the validity of the State's assessments of local housing needs.

.....

It is crucial that HCD conduct and document supervisor reviews of its needs assessments to ensure that councils of governments plan for the appropriate amount of housing and to maintain public confidence in the validity of the State's assessments.

.....

HCD Did Not Demonstrate That It Adequately Considered Certain Factors That State Law Requires for Housing Needs Assessments

HCD did not demonstrate that it adequately considered two factors listed in state law when preparing the three needs assessments we reviewed, which potentially further reduced the reliability of its needs assessments. The law requires HCD to review data and assumptions that councils of governments submit for the factors considered in housing needs assessments, and it allows HCD to make adjustments to the needs assessments after this consideration. HCD may accept or reject the submitted information, and it must issue a written determination on the data assumptions for each factor and the methodology it will use.

Although HCD generally included most of the factors outlined in state law in the three needs assessments we reviewed, it did not adequately demonstrate how it considered two factors: the balance between jobs and housing in the region (jobs/housing balance) and housing lost in emergencies, such as wildfires. The housing policy deputy stated that HCD addresses these factors through its projected household data and other adjustment factors, and currently documents that consideration with an assertion in its final needs assessment that it considered all factors specified in state law.

.....

HCD did not adequately demonstrate how it considered the balance between jobs and housing in the region and housing lost in emergencies, such as wildfires.

.....

When we asked HCD about its specific consideration of the jobs/housing factor, HCD indicated that it relied on a work group's draft analysis of jobs/housing relationships. However, this analysis is outdated and provided limited direction for how the jobs/housing balance would affect needs assessments. The housing policy deputy stated that HCD had studied the jobs/housing balance factor in 2010, 12 years ago. The analysis noted that the inconsistent data available between regions makes regional comparisons of jobs and housing difficult and that statewide standardized employment data are not available for comparison purposes. Although it did not recommend specific adjustments for the jobs/housing balance factor, the 2010 work group indicated that HCD should solicit specific information from councils of governments to address this factor. However, HCD did not specifically request such information from the Sacramento Council, the Santa Barbara Association, or Amador County—the three needs assessments we reviewed—in order to determine those needs assessments.

HCD believes that its other adjustments for different factors also addressed the jobs/housing balance factor. Specifically, HCD asserted that its adjustments to address low vacancy rates, high overcrowding, and high cost burdens address jobs/housing balance issues. However, HCD did not provide an analysis that demonstrated how, or to what extent, these adjustments address the jobs/housing balance. The housing policy deputy also noted the potential for inequitable adjustments for jobs/housing balance between regions because regions receive needs assessments at different times but agreed to review data sources and seek academic perspectives on approaches to account for the jobs/housing balance

in the next round of needs assessments. HCD also agreed that as part of its review of the jobs/housing balance factor, it would consider either adding a specific adjustment or modifying its other adjustments, such as increasing the cost burden adjustment, to better account for the factor in the future.

.....

HCD agreed that as part of its review of the jobs/housing balance factor, it would consider either adding a specific adjustment or modifying its other adjustments, such as increasing the cost burden adjustment, to better account for the job/housing balance factor in the future.

.....

The second factor HCD inadequately considered was housing lost during emergencies. HCD did not consider housing lost during emergencies in a consistent manner across different regions, which led it to understate housing needs in the Santa Barbara Association's needs assessment. State law requires HCD to consider data and assumptions submitted by a council of governments on housing lost during a state of emergency declared by the Governor if that lost housing has not been rebuilt or replaced at the time of the collection of data for the needs assessment. In 2017 the Governor declared a state of emergency in Santa Barbara and Ventura counties due to the Thomas Fire, which destroyed more than 1,000 housing units and other structures. HCD did not consider the loss of units caused by this wildfire, as required by state law, and did not make an adjustment for this factor in the 2021 Santa Barbara Association needs assessment, as it did in another region, which we discuss below. We believe HCD should have worked with state and county officials to consider this factor in the assessment so that the Santa Barbara Association can plan to address actual housing needs.

HCD's housing policy deputy explained that HCD believes another factor addresses housing lost to fire emergencies. As we discuss in the Introduction, HCD determines the replacement rate at which each council of governments' region loses housing units and applies an adjustment in the needs assessment to replace housing. The replacement adjustment reflects the average annual rate of housing loss over the past 10 years that a council of governments needs to replace for units that have been destroyed or demolished, or are no longer inhabitable. The housing policy deputy stated

that Finance provides it with information on the rate of housing replacement, such as when there is a fire that requires a building to be replaced. Although HCD considered replacement units in the Santa Barbara Association needs assessment, it did not include a separate consideration for units destroyed in emergencies. HCD's replacement adjustment identified the average rate that housing is replaced in Santa Barbara County based on 10 years of data from Finance. However, this approach minimized the effect of a wildfire by combining it with normal years of housing losses, resulting in less overall housing than actually needed.

Furthermore, HCD's approach to the Santa Barbara Association's declared state of emergency was not consistent with the approach it took in another assessment. Specifically, for the Butte County Association of Governments, HCD worked with county and state officials, including Finance, when it considered and then included an adjustment specifically for housing destroyed in the 2018 Camp Fire, for which the Governor also declared a state of emergency. HCD noted that it included the adjustment for the Butte County Association of Governments because this fire and associated housing loss was particularly large. We expected HCD to consider housing lost in declared emergencies consistently.

**It is critical that HCD's actions
increase confidence in the needs
assessment process.**

HCD needs to thoroughly document its required consideration of each factor because the needs assessment process is complex and can be contentious, drawing significant attention from local governments as well as interest groups. Therefore, it is critical that HCD's actions increase confidence in the needs assessment process. Although state law permits HCD to determine what adjustments, if any, to make in response to a particular factor, documenting the specific methodology and determination will enhance transparency and public trust. It will also allow HCD to more effectively justify its conclusions to stakeholders and potentially avoid litigation. It is also important that HCD conduct its needs assessments consistently across different regions and in compliance with state requirements, especially when adjusting for sensitive issues such as wildfire disasters.

The Healthy Vacancy Rate HCD Used in Assessments We Reviewed Was Poorly Supported

HCD did not provide adequate support for a critical determination it made about the healthy housing vacancy rate that it used in the three needs assessments we reviewed, raising questions about whether HCD can support the rate in its other assessments. State law requires HCD to consider how councils of governments' vacancy rates compare with healthy vacancy rates when determining housing needs assessments. As we discuss in the Introduction, state law specifies that a healthy vacancy rate for rental housing should not be less than 5 percent, but it does not specify a healthy vacancy rate for owned housing, allowing HCD to make that determination.

HCD used a 5 percent healthy vacancy rate for the combined rental and ownership markets for two of the councils of governments' assessments we reviewed.² HCD calculated the vacancy rate adjustment by subtracting the region's overall vacancy rate from the 5 percent healthy vacancy rate. Based on that rate, the vacancy rate adjustment for the Santa Barbara Association resulted in an increase of more than 4,000 housing units to the overall housing needs. Even a 1 percent difference—higher or lower—can make a significant difference in the needs assessment. For example, if HCD had used a 1 percent higher healthy vacancy rate target, the adjustment would have increased by 40 percent, to 5,600 housing units. Therefore, it is important that the rate that HCD uses is adequately supported.

.....

Even a 1 percent difference—higher or lower—in the healthy vacancy rate assumption can make a significant difference in the needs assessment.

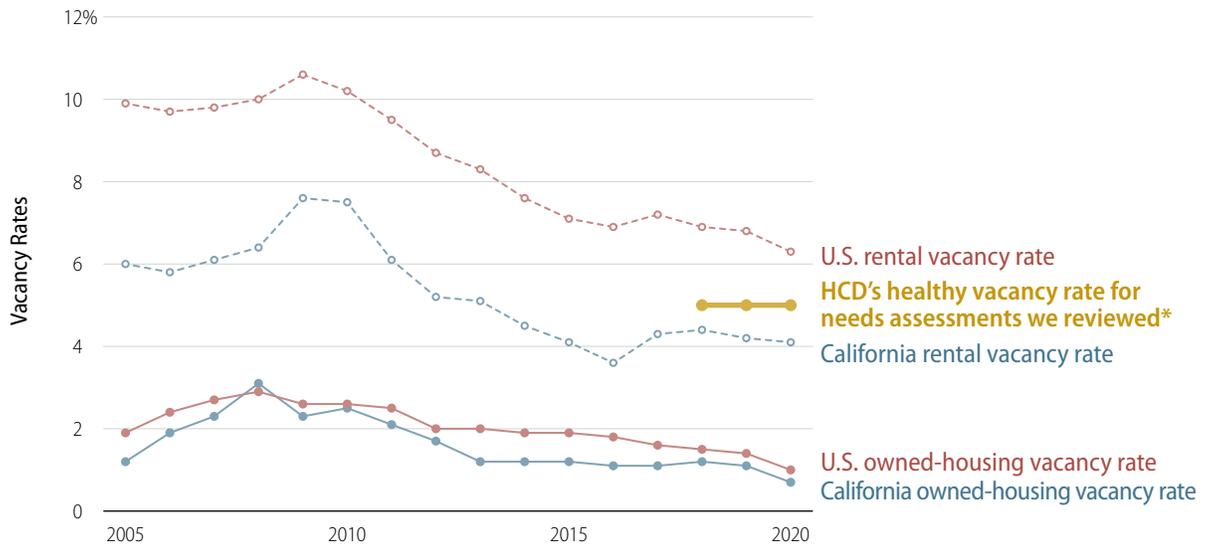
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HCD concluded that its choice of a single healthy vacancy rate for the overall market instead of separate rates for owned and rental housing was appropriate. HCD stated that in 2018, for the current round of needs assessments, it began evaluating vacancy rates across the total number of homes available, a change from its previous approach of separating the rental and ownership markets before

² HCD used a 4 percent healthy vacancy rate to perform the adjustment for Amador County—a county without a council of governments. HCD explained that it used a lower rate for rural areas because they have a higher proportion of owned housing compared to rental housing and the ownership market typically has less turnover, and thus fewer homes on average will be empty at any given time in rural areas than in the State as a whole.

evaluating vacancy rates in each of them. HCD stated that it changed its approach to reflect the fact that some owned housing becomes rental housing over time. Conversely, a development may be rented for an initial period and then sold to owners after a condominium conversion. However, as shown in Figure 4, the vacancy rates of the two categories are significantly different—ownership vacancy was much lower than rental vacancy over the past 15 years. We are concerned that HCD has not completed a formal analysis to support its claim that a single healthy vacancy rate was appropriate.

Figure 4
HCD Targeted a Vacancy Rate That Is Between Historical Rates for Rented and Owned Housing



Source: Data from the Census and HCD websites.

* Before it started using a single 5 percent vacancy rate in 2018, HCD used separate rates for rental and owned housing for each assessment.

When we asked HCD for its support for using the 5 percent healthy vacancy rate in the assessments, it provided only limited information that did not adequately support its assumptions. HCD explained that although it understands that the ownership vacancy rate is somewhat lower than 5 percent, the literature it reviewed indicated that a healthy rental vacancy rate is likely somewhat higher than 5 percent, and it believes the 5 percent is defensible for the combined market. However, HCD did not thoroughly analyze vacancy rates when it began to use this healthy vacancy rate assumption in 2018. HCD provided a summary document from a work group it convened in 2010 that reviewed historical vacancy rates in different regions, but the work group’s summary did not reach a conclusion on a

healthy vacancy rate. Instead, the summary referenced information the work group had reviewed, including government reports, and noted a range of vacancy rates among other states that included separate rates for owned and rented housing. Additionally, some of the information was outdated because several of the government reports the summary cited were published in the 1980s. The summary also stated that HCD had used the same healthy vacancy rates—using separate rates for owned and rental housing—since 2006 and may adjust them for current economic conditions.

Despite the large impact of the vacancy rate adjustment on a region's total needs assessment, HCD has relied on the 5 percent healthy vacancy rate without providing adequate support for its approach. For example, HCD made a vacancy rate adjustment to increase Sacramento's needs assessment by more than 22,700 units, or nearly 15 percent of the total housing needs. Therefore, we expected HCD to provide sufficient analysis and support for its assumptions underlying the healthy vacancy rate it used in the assessments we reviewed. When HCD does not develop a strong analysis with clear justification for its assumptions, especially those that have significant impact on the size of its final assessments, it risks making adjustments that are not reflective of a region's true housing needs.

.....

When HCD does not develop a strong analysis with clear justification for its assumptions, especially those that have significant impact on the size of its final assessments, it risks making adjustments that are not reflective of a region's true housing needs.

.....

HCD Did Not Identify a Problematic Proposal From a Region and Inappropriately Reduced Its Needs Assessment

HCD did not sufficiently review the regions that councils of governments compared themselves to as part of the needs assessment process. For two factors in its needs assessments, state law requires HCD to consider how a council of governments' regional data compares to that of other similar regions in the nation. For these factors—overcrowding and cost burden—the law requires councils of governments to provide data from regions they propose as “comparable.” For the cost burden adjustment, state law requires councils to provide data from “healthy” housing markets. State law

allows HCD to adjust a council of governments' needs assessment based on these factors, thus allowing communities to plan for more housing to better address the housing crisis. Under state law, HCD must consider the information a council of governments submits, though it does not have to use that information in its final needs assessment. State law does not provide criteria for the councils of governments to select comparable regions to propose. However, in correspondence to the council of governments we reviewed, HCD recommended that several non-housing factors—such as population, median income, and jobs per capita—be included for comparison to help guide councils of governments in their selections of comparable, healthy regions.

HCD's reviews of comparable regions selected by councils of government have been inconsistent because the department does not have a formal process for such reviews. The housing policy deputy explained that HCD reviews the appropriateness of the regions that councils of governments propose as comparable and has rejected a proposal in the past. However, HCD does not have a documented process to guide its evaluation of councils of governments' proposals to ensure that its reviews are consistent. HCD explained that even though it does provide guidance on what criteria councils of governments could use for their proposals of comparable regions, it has avoided instituting a specific, formal review process because state law specifically allows councils of governments to determine what regions are comparable. However, state law also gives HCD the ability to reject those same proposals. Therefore, we believe it is important for HCD to have a formal process to review the comparable regions that councils of governments propose so it can ensure that it is using this authority consistently for different needs assessments.

.....

It is important for HCD to have a formal process to review the comparable regions that councils of governments propose so it can ensure that it is using its authority consistently for different needs assessments.

.....

The Santa Barbara Association provided HCD with a comparable region proposal that we found problematic. In January 2021, after working with HCD to adjust its comparable region proposal, the Santa Barbara Association provided a memo to HCD explaining that it based its selection of comparable regions on certain categories,

such as population, household size, rent-to-income ratio, age distribution, and poverty. These criteria resulted in the Santa Barbara Association choosing regions that were likely experiencing housing problems similar to its own region because they also had higher, unhealthy, rates of overcrowding and cost-burdened households compared to national averages. The use of household sizes and rent-to-income ratios to select comparable regions was problematic. For example, the overcrowding rate—reflecting the number of housing units that have more than one person per room in a region—is likely higher in a region with a higher average household size. Similarly, a region with a higher rent-to-income ratio is likely to have more households with heavy cost burdens. Higher overcrowding and heavier cost burdens than the national average indicate that those housing markets are not healthy.

HCD accepted the comparable regions the Santa Barbara Association proposed, which likely lowered the needs assessment from what it would have been had HCD used healthy housing markets for one of the adjustments. HCD explained that it views its role as providing guidance to councils of government in their process of selecting comparable regions, rather than being prescriptive. However, our concern is that the Santa Barbara Association specifically used certain criteria that resulted in it selecting unhealthy housing markets, which HCD acknowledges is an approach that has led it to reject other councils' comparisons. Had HCD compared the Santa Barbara Association to regions with cost burden rates closer to the national average, we estimate that its needs assessment would have increased by 470 housing units to about 25,300, or an increase of 1.9 percent. Without a consistent process to review the criteria that councils of governments propose to identify comparable regions, HCD may be allowing some regions to plan for less housing than they otherwise should.

Recommendations

Legislature

To provide HCD additional clarity and guidance in conducting its vacancy rate adjustments, the Legislature should amend state law to clarify whether HCD should continue to use a healthy vacancy rate that includes both rental and owned housing or whether it should determine and use separate healthy vacancy rates for owned housing and rental housing.

HCD

To ensure that its needs assessments are accurate and do not contain unnecessary errors, by June 2022 HCD should institute a process to ensure that its staff performs multiple reviews of data in its assessments, including data that staff members input and councils of governments submit.

To demonstrate that its needs assessments are complete and address all relevant factors, by September 2022 HCD should establish a formal process to document its consideration of all factors required by state law in its needs assessments.

To ensure that it adequately supports the vacancy rate adjustments it makes to needs assessments, by February 2023 HCD should perform a formal analysis of healthy vacancy rates and historical trends to inform those adjustments.

To ensure that it does not reduce its needs assessments based on inappropriate information provided by councils of governments, by June 2022 HCD should develop a formal process to review the appropriateness of councils of governments' proposed comparable regions, including identifying the criteria it will consider when reviewing councils of governments proposals. HCD should use this formal process and criteria to consistently evaluate the appropriateness of the proposals to ensure that they identify regions with healthy housing markets.

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Finance Provides Reasonable Population Projections, but It Has Not Provided Sufficient Support for Its Household Formation Projections

Key Points

- Finance's population projections are the basis of HCD's needs assessments, and they are generally accurate. Projections for counties with less than 250,000 residents were less accurate than for counties with more than 1 million residents, but the accuracy of projections has improved over time.
- Finance also creates projections of the number of future households in the State by county. Although HCD uses the household projections in its needs assessments, Finance has not conducted a rigorous analysis to support the household formation rates it uses for the projections.

Finance's Population Projections Have Generally Been Accurate

The basis of housing needs assessments are population forecasts that Finance produces. State law requires Finance to produce short- and long-range projections of the population, and it does so for the entire State and its counties. To develop its population projections, Finance projects future births, deaths, and migration, or movement into and out of the State, to determine the State's future population by county. HCD then uses the projections for five to 10 years into the future in its needs assessments, depending on the period the assessment covers.³ To review the accuracy of Finance's previous population projections and their potential impact on HCD's needs assessment process, we compared the statewide population projections for 2020 that Finance published in 2011 to Census data for 2020. We found that its projections were overestimated by just 2.7 percent. The variables that affect population estimates, such as the number of deaths, births, and migration, are not constant values and are difficult to predict precisely; therefore, we considered Finance's statewide projections reasonable.

We also reviewed the process and data that Finance uses to make its projections and found that it is appropriate. Finance has programmed the software that it uses to make projections to identify and remove illogical results and fix errors in the results. Finance staff members also perform reviews of these projections. Staff members compare the projections to previous projections to ensure that there are no unexpected or dramatic changes. Finance also stated that managers review the results before the department provides the data to HCD.

When we reviewed Finance's county-level projections over several years, we noted that their accuracy varied. The projections Finance made in 2011 for the 2020 population were less accurate in counties with less than 250,000 residents than in counties with

³ HCD's needs assessments we reviewed are for eight to 10 years in the future, ranging from 2029 to 2031.

more than 1 million residents. For example, Finance projected that Colusa County's 2020 population would be nearly 25,000, but the actual population according to the 2020 Census was only about 22,000, a difference of 12 percent. In contrast, Finance projected that Orange County's 2020 population would be 3.2 million, and the actual 2020 population was 3.19 million, a difference of 0.4 percent. However, we reviewed subsequent projections that Finance published in 2013, 2016, and 2019 of 2020 county populations and found, as would be expected, that its 2019 projections were more accurate.

Finance plans to account for 2020 Census results when making its next population projections in 2023. When we asked Finance about the differences that we identified in its projections compared to Census data, it had already begun reviewing those differences in preparation for its next population projections. In fact, it had identified a series of events and changes that may have affected the accuracy of its projections in specific counties. For example, Finance noted that its projection for Mono County was inaccurate due to population reductions resulting from staffing changes at a military facility in that county. Further, it explained that it overestimated international migration into Imperial County, leading to differences between the Census data and its projection. As a result, Finance told us that it plans to make adjustments in its approach for projections as it incorporates 2020 Census data into its next population projections, which it expects to release in early 2023.

.....

Finance plans to make adjustments in its approach for projections as it incorporates 2020 Census data into its next population projections.

.....

Finance Has Not Adequately Supported Rates It Uses to Develop Household Formation Projections

Finance did not have a rigorous process to support its projections of the number of households in each region, despite the importance of this data in determining a region's housing needs. One of the factors that HCD's needs assessments include are the projections of the number of households that Finance expects in future years in communities across the State. Finance estimates the number of expected households by identifying a household formation rate for different age groups in each county. The household formation rate

represents the likelihood that individuals in particular age groups will have their own households. HCD applies the rate by age group to the population projections to estimate the number of households that will exist in the future in a region. Because local governments will need to plan housing to accommodate these new households, HCD includes this expected new demand in its needs assessment process.

We expected Finance to use household information in the 2010 Census as its basis for projecting household formation rates, as 2010 data forms the basis of its current set of population projections.⁴ However, Finance explained that instead it estimated current household formation rates using information from earlier Census data as well as the 2010 Census. Specifically, Finance projects that Californians will be increasingly likely to form their own households in the coming years until household formation rates reach levels seen before 2010. Finance explained that before 2010, more people were willing to live independently than do currently. However, Finance noted the 2010 Census identified a relatively low household formation rate, which may have resulted from cultural, demographic, or economic changes, such as the Great Recession that began in 2007. According to Finance, its household formation rate reflects an assumption that household formation patterns in California will increase over time to pre-2010 levels—those before that recession, when people were more likely to own homes or take on fewer roommates.

.....

Finance did not formally study how Californians would form households; rather, its household formation rates were the result of deliberations among members of the advisory committee.

.....

However, Finance did not formally study how Californians would form households. In partnership with HCD in 2014, it solicited advice from some experts participating on the 2015–2025 Statewide Housing Plan Technical and Research Advisory Committee (advisory committee) to guide its decisions on household formation rates. Finance noted that its household formation rates were the result of deliberations among members of the advisory committee.

⁴ Finance expects to receive detailed 2020 Census information by county in August or September 2022. It plans to release new population projections, which will include information that accounts for the effects of the COVID-19 pandemic, in January or February 2023.

This advisory committee is different from the work group mentioned previously that HCD convened in 2010 that discussed vacancy rates. However, our review of available documentation from the advisory committee found that it did not make any conclusions about household formation rates. The advisory committee also did not provide Finance any formal guidance, analysis, or report on household formation rate trends.

In 2015 and 2016, Finance and HCD staff members reached out to several university professors and other experts from the advisory committee to discuss household formation rates. In a series of emails, staff members from Finance and HCD communicated with experts to discuss factors that may affect household formation rates, such as changes in young adult behavior after the Great Recession and slowing immigration and birth rates. This discussion also reflected concerns about relying on 2010 Census data, because the data reflected conditions during a recession. As part of these conversations, HCD and Finance proposed to the experts several different household rate trends, one of which Finance now uses. Although Finance believes its household formation rates are reasonable, these discussions do not constitute a thorough analysis. Given that this rate is an important component of the household projections that Finance used for multiple years, we expected Finance to better support the assertion that it is using the most appropriate rate. For example, Finance could have documented an analysis of historical household formation trends, a review of academic literature, and its consideration of all factors relevant to household formation rates to demonstrate that its household projections are defensible.

Slight changes to household formation rates, which directly increase or decrease the number of projected households, can change HCD's needs assessments by thousands of units.

Needs assessments can change significantly depending on the accuracy of Finance's assumptions. Slight changes to household formation rates, which directly increase or decrease the number of projected households, can change HCD's needs assessments by thousands of units. For example, if HCD's needs assessment for the Santa Barbara Association used household formation rates 1 percent lower, the region's needs assessment would decrease by

17.5 percent, or about 4,350 fewer units of housing.⁵ Similarly, if the needs assessment used 1 percent higher household formation rates, the needs assessment would increase by as many units.

Finance plans to reevaluate its household formation rates soon. Finance believes the household formation rates it uses are still reasonable because available Census data generally indicated that it was still a reasonable expectation for household formation rates to increase in the future and that it would make sense to wait to formally reevaluate its assumption after detailed 2020 Census data is available. Finance also explained that its assumption that household formation rates will grow over time helps it to avoid projecting that recession-era economic issues and housing affordability problems will persist and affect household growth indefinitely in the State. However, without a formal comprehensive review of more recent demographic and economic information, Finance cannot adequately assure the public, stakeholders, and HCD that it is providing the most appropriate household formation rates that HCD includes in the critical needs assessment process.

Recommendations

Finance

To ensure that the population projections it provides to inform HCD's needs assessments are as accurate as possible, by February 2023 Finance should review its projections for the counties with the most significant projection inaccuracies and adjust its methodology as necessary based on 2020 Census data and other information.

To ensure that the household formation rates that it provides HCD are appropriate, Finance should, by February 2023, conduct a comprehensive review of its assumptions about the household formation rates it uses in projections, and it should document that review.

⁵ The Santa Barbara Association's current needs assessment calculates the number of projected households using a set of eight household formation rates for different age groups, ranging from 11 percent for residents 15 through 24 years old to 72 percent for residents who are 85 and older. Finance explained that older residents have a higher household formation rate because they are likely to be financially independent and thus live in their own households.

We conducted this performance audit in accordance with generally accepted government auditing standards and under the authority vested in the California State Auditor by Government Code section 8543 et seq. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael Tilden". The signature is written in a cursive, flowing style.

MICHAEL S. TILDEN, CPA
Acting California State Auditor

Date: March 17, 2022

Appendix A

HCD HOUSING NEEDS ASSESSMENTS WE REVIEWED

The chair of the Joint Legislative Audit Committee (Audit Committee) directed the California State Auditor (State Auditor) to conduct an emergency audit to examine HCD's regional housing needs determination process. We reviewed three of HCD's regional housing needs assessments: the Sacramento Council, the Santa Barbara Association, and Amador County. We provide those assessments in tables A.1 through A.3 to give context to the findings in our report. As noted in the Introduction, for counties without a council of governments, HCD also provides allocations of housing needs to the county and cities within it. Table A.4 provides the allocation HCD provided to Amador County and the cities within that county. In contrast, the councils of governments provide allocations of housing needs by income category to their member counties and cities.

HCD did not provide consistent details in the three assessments reviewed, and as a result, there are some differences among the assessments we display below. The time covered by the assessments, and the total housing needs that communities must accommodate, vary. HCD does not complete all assessments at the same time and does not always cover the same period because it aligns the needs assessment process with other planning processes, such as regional transportation planning. The total regional housing needs assessment corresponds to the time period displayed either in the assessment header as in the case of the Sacramento Council, or in the population projection.

Table A.1
HCD Regional Housing Needs Assessment for the Sacramento Council

SACRAMENTO COUNCIL: JUNE 30, 2021–AUGUST 31, 2029 (8.2 YEARS)	
STEPS TAKEN TO CALCULATE REGIONAL HOUSING NEEDS	AMOUNT
Population: August 31, 2029 (Finance June 30, 2029, projection adjusted +2 months to August 31, 2029)	2,844,860
– Group Quarters Population	– 57,315
Adjusted Household Population	2,787,545
Projected Households Minus South Lake Tahoe*	1,021,005
+ Vacancy Rate Adjustment (2.23%)	22,730
+ Overcrowding Adjustment (0.60%)	6,111
+ Replacement Needs Adjustment (0.50%)	5,105
– Occupied Units Estimated (June 30, 2021)	– 908,396
+ Cost Burden Adjustment	6,957
Sixth Cycle Regional Housing Needs Assessment Total	153,512 Housing Units

Source: HCD's needs assessment for the Sacramento Council.

* South Lake Tahoe is not in the Sacramento Council planning area, but it is included in Finance's population and household projections for El Dorado County. Discussions between HCD, the city of South Lake Tahoe, the Tahoe Regional Planning Agency (TRPA), and the Sacramento Council have resulted in the determination that the households projected by TRPA for the 2021–2029 needs assessment cycle (445 units) should not be included in the needs assessment determined for the Sacramento Council region.

Table A.2
HCD Regional Housing Needs Assessment for the Santa Barbara Association

SANTA BARBARA ASSOCIATION: PROJECTION PERIOD (8.6 YEARS)	
STEPS TAKEN TO CALCULATE REGIONAL HOUSING NEEDS	AMOUNT
Population: February 15, 2031 (Finance June 30, 2031, projection adjusted -4.5 months to February 15, 2031)	488,190
– Group Quarters Population	– 27,525
Adjusted Household Population	460,665
Projected Households	160,850
+ Vacancy Rate Adjustment (2.51%)	4,030
+ Overcrowding Adjustment (6.44%)	10,359
+ Replacement Needs Adjustment (0.50%)	804
– Occupied Units	– 152,576
+ Cost Burden Adjustment	1,389
Sixth Cycle Regional Housing Needs Assessment Total	24,856 Housing Units

Source: HCD's needs assessment for the Santa Barbara Association.

Table A.3
HCD Regional Housing Needs Assessment for Amador County

AMADOR COUNTY: PROJECTION PERIOD (10.9 YEARS)	
STEPS TAKEN TO CALCULATE REGIONAL HOUSING NEEDS	AMOUNT
Population: September 15, 2029 (Finance June 30, 2029, projection adjusted to September 15, 2029)	40,090
- Group Quarters Population	- 4,405
Adjusted Household Population	35,685
Projected Households	15,330
+ Vacancy Rate Adjustment (0.04%)	6
+ Overcrowding Adjustment (0%)	0
+ Replacement Needs Adjustment (0.50%)	68
- Occupied Units	- 14,697
+ Cost Burden Adjustment	34
Sixth Cycle Regional Housing Needs Assessment Total	741 Housing Units

Source: HCD's needs assessment for Amador County.

Table A.4
HCD Distribution of Regional Housing Needs Allocation for Amador County

JURISDICTION	REGIONAL HOUSING NEEDS ALLOCATION BY INCOME CATEGORY				TOTAL
	VERY LOW	LOW	MODERATE	ABOVE MODERATE	
Amador County Total	189	123	140	289	741
Amador	1	1	1	2	5
Ione	30	20	25	42	117
Jackson	27	23	24	64	138
Plymouth	7	5	5	13	30
Sutter Creek	15	12	13	34	74
Unincorporated Amador County	109	62	72	134	377

Source: HCD's needs assessment for Amador County.

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Appendix B

SCOPE AND METHODOLOGY

The Audit Committee directed the State Auditor in October 2021 to conduct an emergency audit to examine the regional housing needs determination process. The audit was approved under Joint Legislative Audit Committee Rule 17. Recognizing that Rule 17’s cost limitations prevented us from satisfying all objectives of the emergency audit, we focused our work on the first three objectives contained in the emergency audit request. The table below lists those objectives and the methods we used to address them.

Audit Objectives and the Methods Used to Address Them

AUDIT OBJECTIVE	METHOD
<p>1 Review and evaluate the laws, rules, and regulations significant to the audit objectives.</p>	<p>Reviewed relevant laws, rules, regulations, policies, and procedures related to the housing needs assessment process.</p>
<p>2 Assess Finance’s process for developing population projections used by HCD. Determine what changes Finance made to its projections in response to economic and demographic changes caused by the pandemic as well as new Census information. Evaluate historical accuracy of Finance’s population projections.</p>	<ul style="list-style-type: none"> • Reviewed Finance’s calculation process for its most recent set of projections and assessed the reasonableness of its process and the information Finance uses to generate its projections. • Assessed Finance’s planned modifications to future projections based on COVID-19 impacts and found them to be reasonable. Finance intends to update its projections in January or February 2023 to take into account recent Census data that reflects reduced births and increased deaths due to the pandemic in 2020 and early 2021. • Compared Finance’s past population projections to 2020 Census data to assess their accuracy.
<p>3 Evaluate HCD’s process for developing regional housing needs determinations to ascertain whether it complies with state law and results in appropriate calculations. Assess whether HCD properly used vacancy rates for rental markets and for the entire housing market.</p>	<ul style="list-style-type: none"> • Reviewed the process HCD used to create three needs assessments for the Sacramento Council, the Santa Barbara Association, and Amador County, and determined which factors listed in state law it considered, and whether its consideration was appropriate. • For the same three assessments, which HCD completed after changes to state law in 2018, reviewed each adjustment HCD made in the assessments and determined the relative impact of the adjustments on the overall assessment. • For the three assessments we reviewed, assessed HCD’s support for the 5 percent healthy vacancy rate it uses for the overall housing market, including reviewing available historical information and economic research.

Source: Audit workpapers.

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State of California
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

Gavin Newsom, Governor
 Lourdes M. Castro Ramirez, Secretary

March 4, 2022

Michael S. Tilden*
 Acting State Auditor
 California State Auditor
 621 Capitol Mall, Suite 1200
 Sacramento, CA 95814

RE: Agency Response to 2021-125 Regional Housing Needs Assessments: The Department Of Housing And Community Development Must Improve Its Processes To Ensure Communities Can Adequately Plan For Housing

Dear Mr. Tilden:

Thank you for the opportunity to review and provide comments to the audit pertaining to the Regional Housing Needs Assessment (RHNA) process led by the Department of Housing and Community Development (HCD).

As noted, the state's RHNA process requires consultation with Councils of Governments and intensive data analysis to determine the housing needs for regions. We appreciate that the audit found that HCD follows a sound methodology in administering this responsibility and offers some process improvement recommendations. ①

Attached you will find a detailed response from HCD summarizing the additional resources and process improvements that are underway including increasing staff and standardizing documentation processes.

The Business, Consumer Services and Housing Agency (Agency) and HCD are committed to maximizing opportunities for all Californians to have a stable, affordable place to call home.

If you have any additional questions for my team at Agency or HCD, please contact us at your convenience.

Sincerely,

Lourdes Castro Ramirez, M.A.
 Secretary

500 Capitol Mall, Suite 1850, Sacramento, California 95814 (916) 653-4090 www.bcsh.ca.gov

Alcoholic Beverage Control Appeals Board | Department of Alcoholic Beverage Control | California Horse Racing Board | Department of Real Estate
 California Housing Finance Agency | Cannabis Control Appeals Panel | Department of Financial Protection and Innovation | Department of Consumer Affairs
 Department of Fair Employment & Housing | Department of Housing and Community Development | Department of Cannabis Control
 California Interagency Council on Homelessness

* California State Auditor's comments appear on page 41.

March 2022



STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
 OFFICE OF THE DIRECTOR
 2020 W. El Camino Avenue, Suite 500
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GAVIN NEWSOM, Governor

March 4, 2022

Michael S. Tilden
 Acting California State Auditor
 621 Capitol Mall, Suite 1200
 Sacramento, CA 95814

RE: Regional Housing Needs Assessment

Dear Mr. Tilden:

①

This is the California Department of Housing and Community Development's (HCD) response to the Regional Housing Needs Assessment (RHNA) audit conducted by the California State Auditor. HCD is pleased to see the audit found no significant problems with the methodology or instances of double counting. The auditor also identified that statutory changes that allow HCD to provide adjustments to the existing and projected regional housing needs have resulted in larger determinations.

Still, the audit found opportunities for process improvements and HCD is committed to implementing those recommendations. HCD has already added more staff to the RHNA team and, in partnership with our internal audit team, continues to improve the quality of our determination process. HCD remains confident in its approach to the 6th Cycle RHNA Determination both from a legal and methodological perspective. HCD is also confident that, in particular following the auditor's review, process and quality control improvements will be beneficial moving forward.

The audit recommendations and HCD's responses are below.

Recommendation 1 (Quality Control/Quality Assurance): To ensure that its needs assessments are accurate and do not contain unnecessary errors, by June 2022 HCD should institute a process to ensure its staff perform multiple reviews of data included in its assessments, including data that staff input and councils of governments (COGs) submit.

- Response: HCD agrees with the first recommendation (page 25 of 38) and will complete documenting the process by the proposed deadline. HCD has started to create additional process documents to aid in implementing this recommendation. HCD is committed to more accurately determining the housing need moving forward and values the improved process suggestions.

Recommendation 2 (Jobs Housing Factor and Units Lost): To demonstrate that its needs assessments are complete and address all relevant factors, by September 2022



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GAVIN NEWSOM, Governor

HCD should establish a formal process to document its consideration of all factors required by state law in its needs assessments.

- Response: HCD is committed to continuous process improvement and providing public documentation of the processes we implement. While HCD does consider all factors described in statute, HCD agrees with the second recommendation (page 26 of 38) and has already initiated the creation of additional process documents to aid in implementing this recommendation.¹ HCD will complete the documentation process by the proposed deadline. ②

Recommendation 3 (Vacancy Rate): To ensure that it adequately supports the vacancy rate adjustments it makes to needs assessments, by February 2023 HCD should perform a formal analysis of healthy vacancy rates and historical trends to inform those adjustments.

- Response: As the auditor's report states, the Legislature did not specify what vacancy rate to use for ownership housing. Given that housing units can fluctuate between renter and home ownership, and acceptable rental vacancies could be higher than 5 percent, HCD's 5 percent target rate for total housing stock vacancy is a reasonable application of the statute. However, HCD agrees with the third recommendation (page 26 of 38) and will complete a formal analysis of trends and compile updated research on this topic by the proposed deadline. ③

Recommendation 4 (Comparable Region Analysis): To ensure that it does not reduce its needs assessments based on inappropriate information provided by councils of governments, by June 2022 HCD should develop a formal process to review the appropriateness of councils of governments' proposed comparable regions, including identifying the criteria it will consider when reviewing councils of governments' proposals. HCD should use this formal process and criteria to consistently evaluate the appropriateness of the proposals to ensure that they identify regions with healthy housing markets.

- Response: HCD agrees with the fourth recommendation (page 26 of 38) and, by the proposed deadline, will formalize a technical assistance document outlining the comparable regions process, as well as a list of criteria HCD will use when

¹ At the time of this drafting, under confidentiality provisions related to litigation and mediation, HCD is unable to publicly share the details of how it intends to establish a more formal process to document its consideration of all factors in its needs assessments. These confidentiality provisions are anticipated to be lifted contemporaneously with the current publication date of this audit. Should the Auditor require, though HCD does not believe it to be necessary, HCD will supplement this response with the additional information it currently is unable to disclose.

March 2022



STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
OFFICE OF THE DIRECTOR
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-7400 / FAX (916) 263-7417

GAVIN NEWSOM, Governor

reviewing comparable region proposals. Though HCD can accept or reject data provided by COGs, HCD also recognizes the inherent challenge of COGs identifying regions that meet both the undefined concept of comparable and having a healthy housing market given the extent California's housing crisis.

Sincerely,

A handwritten signature in black ink, appearing to read "Gustavo F. Velasquez".

Gustavo F. Velasquez
Director

COMMENTS

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

To provide clarity and perspective, we are commenting on the response to the audit from the Business, Consumer Services and Housing Agency (agency) and HCD. The numbers below correspond to the numbers we have placed in the margin of the response.

The agency and HCD mischaracterize our conclusions. Our report does not state that HCD follows a sound methodology when developing needs assessments. Rather, we identified several problems with HCD's methodology, such as its limited review of staff members' data entries and a lack of adequate consideration of factors required by state law.

①

As we state on page 14, HCD could not demonstrate it adequately considered two factors required by state law in the needs assessments we reviewed. Specifically, for the jobs/housing balance in the region, it relied on outdated information during its consideration and did not follow up with regions as it intended. For housing lost in emergencies, HCD did not consistently consider this factor across different regions. As a result, HCD understated housing needs in the Santa Barbara Association's needs assessment and potentially reduced the overall reliability of the assessment.

②

HCD asserts that the 5 percent target rate for total housing stock vacancy is a reasonable application of state law. However, as we note on page 19, HCD did not adequately analyze healthy vacancy rates when it began to use this healthy vacancy rate assumption in 2018. We are concerned that HCD has not completed a formal analysis to support its claim that using the same healthy vacancy rate for both rental and owned housing was appropriate.

③

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**Gavin Newsom ■ Governor**1021 O Street, Suite 3110 ■ Sacramento CA 95814 ■ www.dof.ca.gov

March 4, 2022

Michael Tilden*
California State Auditor (Acting)
621 Capitol Mall, Suite 1200
Sacramento, California 95814

Re: Department of Finance Response to Draft Audit 2021-125

Dear Michael:

The California Department of Finance has received the California State Auditor's (CSA) draft findings concerning the Regional Housing Needs Assessment Process. The below response addresses CSA's findings and recommendations on Finance's household projections.

CSA first recommends that Finance review its population projections for counties after 2020 Census data are made available. As this is a standard practice for any demographer updating population projections after the release of a new decennial Census and the department intends to conduct this review as it always has, we agree with CSA's recommendation.

Finance's household projections rely on projecting trends in household formation from the 1990, 2000, and 2010 Censuses to 2030. They are intended to show what might happen if these trends continue into the future. There are various reasons why patterns of household formation may be different in the future, such as economic changes, the impact of new government policies, as well as imbalances between housing supply and demand. As these are not generally predictable, we periodically reevaluate trends and assumptions, particularly after the release of a new Census; thus, we agree with the Auditor's second recommendation that Finance review assumptions used in projecting household formation rates after the release of the necessary detailed Census 2020 data later this year.

CSA also recommends that Finance document this review. Each decennial Census is an opportunity to reevaluate and reexamine models and assumptions. Much of Finance's analysis and deliberation has traditionally been internal. Finance agrees with the Auditor's recommendation and will explore ways to more fully document existing processes.

Finally, as the audit notes, Finance reasonably limits its reliance on Census 2010 data for its household projections because that census occurred during the unique—and temporary—economic conditions present in the wake of the Great Recession. In consultation with an advisory committee composed of demographers and other experts in academia, government, and the private sector, Finance's process also

①

* California State Auditor's comment appears on page 45.

March 2022

reflects the long-run trend evident from the 1990 and 2000 Censuses by using the average of 2000 and 2010 Census headship rates as a reasonable proxy for this trend. Furthermore, Finance notes that the methods used for the current DOF household projections are informed by analysis of as much recent American Community Survey (ACS) data as possible to evaluate changes in household formation since the 2010 Census. Comparisons of Finance's earlier projected headship rates and ACS data indicates that the assumptions underlying the projections are reasonable; and that use of Census 2010 based rates exclusively would have resulted in household under-projection.

Thank you for the opportunity to review this draft report. If you have any questions, please contact Walter Schwarm, Chief Demographer.

Sincerely,



Keely Bosler
Director

COMMENT

CALIFORNIA STATE AUDITOR'S COMMENT ON THE RESPONSE FROM THE DEPARTMENT OF FINANCE

To provide clarity and perspective, we are commenting on Finance's response to our audit. The number below corresponds to the number we have placed in the margin of the department's response.

Finance overstates our report's conclusions. We did not make a determination that Finance's reduced reliance on 2010 Census data was reasonable. As we indicate on page 27, Finance explained that its household formation rate reflects an assumption that household formation patterns will increase over time to pre-2010 levels, and on page 28 we note that some experts Finance contacted expressed concern that 2010 Census data reflected recession conditions. We further note on that page that Finance asserted to us that its household formation rates are reasonable based on these and other considerations. However, Finance did not provide us a documented analysis to demonstrate that the household formation rates it used in its projections were reasonable.

①

Attachment 2

WRCOG Regional Housing Needs
Assessment (RHNA) Reform
Comment Letter to SCAG



Western Riverside Council of Governments

County of Riverside • City of Banning • City of Beaumont • City of Calimesa • City of Canyon Lake • City of Corona • City of Eastvale
City of Hemet • City of Jurupa Valley • City of Lake Elsinore • City of Menifee • City of Moreno Valley • City of Murrieta • City of Norco
City of Perris • City of Riverside • City of San Jacinto • City of Temecula • City of Wildomar • Eastern Municipal Water District
Western Municipal Water District • Riverside County Superintendent of Schools

August 1, 2022

Ma'Ayn Johnson, Housing Program Manager
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
VIA E-MAIL: housing@scag.ca.gov

Subject: SCAG RHNA Reform – WRCOG Comment Letter

Dear Ms. Johnson:

On behalf of the Western Riverside Council of Governments (WRCOG), I am submitting the following comments regarding the potential to reform or update the Regional Housing Needs Assessment (RHNA) process for the SCAG region. These comments relate to future iterations of the SCAG RHNA allocation process. As such, WRCOG is not commenting on the need for RHNA, the usage of RHNA by the State of California in any funding decisions, or the application of the RHNA process by the State Department of Housing and Community Development (HCD).

WRCOG has long participated in SCAG's RHNA allocation process, with involvement in the process since 2000. As staff have long observed, the RHNA allocation at the SCAG process is contentious and difficult for all parties involved. During the last allocation process, which occurred from 2019 to 2021, staff saw regions and even individual jurisdictions advocate for specific methodologies based on how that approach would benefit them instead of the region. WRCOG appreciate SCAG's desire to develop an inclusive approach and acknowledge the adoption of guiding principles which were as noted by SCAG:

1. The housing crisis is a result of housing building not keeping up with growth over the last several decades. The RHNA allocation for all jurisdictions is expected to be higher than the 5th RHNA cycle.
2. Each jurisdiction must receive a fair share of their regional housing need. This includes a fair share of planning for enough housing of all income levels, and consideration of factors that indicate areas that have high and low concentration of access to opportunity.
3. It is important to emphasize the linkage to other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

WRCOG's first comment is that staff believe that these principles should be ranked in order of importance and Principle #3 should in fact be the primary principle employed in the RHNA methodology. While not immediately obvious, staff believe that Principle #2 should be secondary to the 3rd Principle. WRCOG makes that recommendation based on not just the goals and policies in the SCAG RTP/SCS document but also the previous 20-years of State Legislation such as AB 32, SB 375, SB 743, and other applicable legislation. Additionally, the SCAG Region is currently facing issues such as water supply and climate adaptation which will reflect a desire to develop new housing in targeted areas instead of a broad regional basis.

Because of that focus, WRCOG's second comment is that staff strongly support SCAG's continued use of transit and job accessibility as primary factors during the RHNA allocation. These factors emphasize regional population within high quality transit areas (HQTAs) and share of regional jobs accessible within 30 minutes driving commute and were previously used in the 2019 RHNA process. WRCOG believes that any future RHNA allocation methodology should align with the use of these factors and to the extent possible, future growth should be directed to HQTAs on a regional basis. If SCAG were to prioritize allocations to HQTAs, what would follow is that there should then be less of a focus on the distribution of units to all jurisdictions. Other areas of the SCAG region have a much higher density of HQTAs than the WRCOG subregion, which means that a desire to distribute units equitably would conflict with the use of HQTAs to allocate units.

WRCOG's final comment regarding the RHNA allocation process is that staff would also call attention to the process by which SCAG estimates persons per household, which is a significant factor in determining the number of units based on anticipated population growth. Staff's review of the adopted growth projections in the most recent SCAG RTP/SCS indicate growth in the number of households which is vastly different than the anticipated population growth. For example, unincorporated Riverside County population is projected to grow from 278,000 persons to 394,000 persons in the next 25 years. This amount of growth is 40%. Over that same period, the number of units projected by SCAG are to nearly double from 57,000 to 105,000. This difference is an increase of over 80%. WRCOG strongly recommends that SCAG evaluate person per household projections as it relates to Western Riverside County, particularly as new data becomes available from the 2020 U.S. Census and other data sources. To the extent more accurate person per household projections can be incorporated into the SCAG growth projections and RHNA allocations, it would be more reflective of historic household occupancy factors.

In conclusion, WRCOG offers the following comments regarding future SCAG RHNA allocations:

1. Consistency with regional planning principles including the goals and objectives of the SCAG RTP/SCS should be primary consideration rather than attempting to ensure an equally uniform method of distribution of units among all jurisdictions.
2. Quantitative factors related to access to transit and regional accessibility should be the primary basis of any RHNA allocation process.
3. The use of updated persons per household data to reflect actual conditions within Western Riverside County.

WRCOG appreciates the opportunity to submit this comment letter regarding future RHNA allocations within the SCAG region and looks forward to continued collaboration with SCAG. If you have any questions regarding these comments, please contact me at kwilson@wrcog.us.

Sincerely,

Dr. Kurt Wilson
Executive Director



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: Cal Cities Activities Update
Contact: Erin Sasse, Regional Public Affairs Manager, Cal Cities, esasse@cacities.org, (951) 321-0771
Date: August 1, 2022

Requested Action(s):

1. Receive and file.

Purpose:

The purpose of this item is to provide an update of activities undertaken by Cal Cities.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #1 - Serve as an advocate at the regional, state, and federal level for the Western Riverside subregion.

Background:

The League of California Cities has been shaping the Golden State's political landscape since the association was founded in 1898. It defends and expands local control through advocacy efforts in the Legislature, at the ballot box, in the courts, and through strategic outreach that informs and educates the public, policymakers, and opinion leaders. Cal Cities also offers education and training programs designed to teach city officials about new developments in their field and exchange solutions to common challenges facing their cities.

This item is reserved for a presentation by Erin Sasse, Regional Public Affairs Manager, Cal Cities. Additional information regarding legislation of interest to Cal Cities members is provided as Attachment 1.

Prior Action(s):

July 21, 2022: The Technical Advisory Committee received and filed.

Fiscal Impact:

This item is for informational purposes only; therefore, there is no fiscal impact.

Attachment(s):

[Attachment 1 - Legislative Update July](#)



League of California Cities - Hot Bill List

Policing

SB 1000 (Becker) Law Enforcement Agencies: Radio Communications.

This measure would require law enforcement agencies to, by no later than January 1, 2024, ensure public access to the radio communications of that agency.

Cal Cities Position: *Oppose*

Cannabis

AB 1014 (McCarty) Cannabis: Retailers: Delivery: Vehicles.

This measure would increase the value of cannabis goods to be carried during delivery up to a maximum value of \$10,000, allowing for a delivery vehicle to become a medium size roaming dispensary.

Cal Cities Position: *Oppose*

SB 1186 (Wiener) Medicinal Cannabis Patients' Right of Access Act.

This measure would require local jurisdictions to change their ordinances to allow for the delivery of medicinal cannabis.

Cal Cities Position: *Oppose*

Catalytic converter theft

AB 1740 (Muratsuchi) Catalytic Converters.

This measure would require a core recycler who accepts a catalytic converter to maintain a written record of the vehicle from which the catalytic converter was removed and would prohibit a core recycler from purchasing or receiving a catalytic converter from a person that is not a commercial enterprise or owner of the vehicle from which the catalytic converter was removed.

Cal Cities Position: *Support*

AB 2407 (O'Donnell) Vehicle Tampering: Theft of Catalytic Converters.

This measure would require a core recycler to report specified information about the purchase and sale of catalytic converters to the chief of police or the sheriff, to obtain and preserve a seller's thumbprint and to request to receive theft alert notifications regarding the theft of catalytic converters.

Cal Cities Position: *Support*

SB 1087 (Gonzalez) Vehicles: Catalytic Converters.

This measure would limit who can legally sell and purchase a detached catalytic converter and would make a violation of this law an infraction punishable with a fine between \$1,000 to 5,000.

Cal Cities Position: *Support*

Fire/Emergency medical services

AB 662 (Rodriguez) Mental Health: State Fire Marshal: Training Standards: Peer-to-Peer Suicide Prevention.

This measure would provide resources for suicide prevention programming that would establish an evidence-based, comprehensive, and tiered approach to suicide safety for first responders across the state.

Cal Cities Position: *Co-Sponsor*

CARE Court/ Behavioral Health

SB 1338 (Umberg) Community Assistance, Recovery, and Empowerment (CARE) Court Program.

This measure would establish a civil court process that would connect individuals experiencing acute mental illnesses to a court-ordered care plan managed by a care team in the community. These care plans would include clinically prescribed, individualized interventions, along with supportive services, medication, and a housing plan.

Cal Cities Position: *Support if Amended*

SB 929 (Eggman) Community Mental Health Services: Data Collection.

This measure would increase the amount of data reported to the Legislature by the Department of Health Care Services regarding the various holds provided under the Lanterman-Petris-Short Act.

SB 970 (Eggman) Mental Health Services Act.

This measure would require the California Health and Human Services Agency to establish the California Mental Health Services Act Outcomes and Accountability Review to assist county mental health programs in improving programs funded by the Act.

Cal Cities Position: *Support*

SB 1238 (Eggman) Behavioral Health Services: Existing and Projected Needs.

This measure would require the Department of Health Care Services to review current and projected behavioral health care infrastructure and service needs in each region of the state.

SB 1154 (Eggman) Facilities for Mental Health or Substance Use Disorder Crisis: Database.

This measure would establish a real-time database to display information about available beds to treat those experiencing mental health or substance use disorders.

Cal Cities Position: *Support*

***SB 965 (Eggman) Conservatorships: Medical Record: Hearsay Rule.**

This measure would allow courts to consider relevant history and testimony from medical experts during a conservatorship proceeding.

SB 1035 (Eggman) Mental Health Services: Assisted Outpatient Treatment.

This measure would allow the court to conduct status hearings with a person subject to an assisted outpatient treatment order to evaluate progress and medication adherence.

Cal Cities Position: *Support*

SB 1227 (Eggman) Involuntary Commitment: Intensive Treatment.

This measure would permit a second intensive treatment period under the Lanterman-Petris-Short Act for a person who is still in need of intensive services, according to their mental health care provider.

***SB 1416 (Eggman) Mental Health Services: Gravely Disabled Persons.**

This measure would modernize the definition of "gravely disabled" within the Lanterman-Petris-Short Act.

Cal Cities Position: *Support*

AB 2281 (Lackey) Early Childhood Mental Health Services Act.

This measure would establish the Early Childhood Mental Health Services Act (ECMSA), to be administered by the Mental Health Services Oversight and Accountability Commission.

Cal Cities Position: *Support*

AB 1985 (Robert Rivas) Organic Waste: Recovered Organic Waste Product Procurement Targets: List of Available Products.

This measure would assist local governments implementing the state's organic waste diversion targets by: 1) phasing in over two years the SB 1383 procurement requirements, 2) adding clarity to what projects and products count towards the procurement requirements, and 3) allow local jurisdictions to use organic waste processed out of state for the purposes of meeting procurement targets.

Cal Cities Position: *Support/Co-Sponsor*

Solid waste and recycling

SB 54 (Allen) Solid Waste: Reporting, Packaging, and Plastic Food Service Ware.

This measure would require manufacturers of plastic single-use, disposable packaging and food service ware to ensure that products sold into the state are either recyclable or compostable by 2032.

This measure would also require a product responsibility organization, created by the manufacturers, to pay additional local government costs to recycle covered plastic products and packaging.

Cal Cities Position: *Support*

AB 2440 (Irwin) Responsible Battery Recycling Act of 2022.

This measure would require producers of batteries and battery-embedded products to establish a stewardship program for the collection, transportation, recycling, and the safe and proper management of batteries or battery-embedded products in California.

Cal Cities Position: *Support*

Water and water conservation

AB 2142 (Gabriel) Income Taxes: Exclusion: Turf Replacement Water Conservation Program.

This measure would exclude from taxable income any rebate, voucher, or other financial incentive received in connection with a turf replacement water conservation program.

Cal Cities Position: *Support*

AB 2247 (Bloom) Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) and PFAS Products and Product Components: Publicly Accessible Reporting Platform.

This measure would require, on or before July 1, 2025, a manufacturer of per- and polyfluoroalkyl substances (PFAS) or a product containing intentionally added PFAS that is sold into the state to register the PFAS or the product containing intentionally added PFAS on the publicly accessible reporting platform created by the Department of Toxic Substances Control and the Interstate Chemicals Clearinghouse.

Cal Cities Position: *Support*

Energy and utilities

AB 205 (Ting)/SB 122 (Skinner) Energy.

This measure would allow for a shift of local authority for siting of solar, wind, and certain battery backup projects to the California Energy Commission (CEC) and would, under the auspices of a Strategic Energy Reserve, delegate to the Department of Water Resources (DWR) blanket authority to bypass local permitting, including through the Coastal Act.

Cal Cities Position: *Oppose*

- Energy and utilities

SB 833 (Dodd) Community Energy Resilience Act of 2022.

This measure would require the California Energy Commission to develop and implement a grant program for local governments to develop community energy resilience plans to address power outages. The community energy resilience plans would also require local governments identify critical facilities, facilities where the construction of microgrids or other distributed energy sources could meet local resilience needs, and potential funding sources for implementing projects in the plan.

Cal Cities Position: *Support*

SB 932 (Portantino) Circulation Element.

This measure would require cities to adopt significant bicycle, pedestrian, and traffic calming elements when they develop and revise their general plans.

Cal Cities Position: *Oppose Unless Amended*

Parking violations

AB 1685 (Bryan) Vehicles: Parking Violations.

This measure would require cities to forgive at least \$1,500 in parking fines and fees annually for a homeless person.

Cal Cities Position: *Oppose Unless Amended*

Broadband

AB 2748 (Holden): Telecommunications: Digital Equity in Video Franchising Act of 2022.

This measure would refocus efforts to prioritizing the right to equal access to cable and broadband for all Californians and strengthening anti-discrimination statutes to be consistent with Federal standards

Cal Cities Position: *Support*

SB 6 (Caballero) Local Planning: Housing Commercial Zones.

This measure would create a new process allowing residential development on certain commercial and industrial sites, including allowing qualifying projects to use the streamlined application procedures of Senate Bill 35 (Wiener, 2017).

Cal Cities Position: *Oppose Unless Amended*

Planning and zoning

AB 2011 (Wicks) Affordable Housing and High Road Jobs Act of 2022.

This measure would require nearly all cities to ministerially approve, without condition or discretion, certain affordable and mixed-use housing developments in areas of a city where office, retail, or parking are principally allowed regardless of any inconsistency with a local government's general plan, specific plan, zoning ordinance, or regulation.

Cal Cities Position: *Oppose*

AB 2053 (Lee) Social Housing.

This measure would create the California Housing Authority with a mission to produce and acquire social housing developments for the purpose of eliminating the gap between housing production and regional housing needs assessment targets and to preserve affordable housing.

Cal Cities Position: *Oppose Unless Amended*

AB 2295 (Bloom) Local Education Agencies: Housing Development.

This measure would declare that notwithstanding any law, a housing development project shall be deemed an allowable use on any real property owned by a local educational agency if the housing development satisfies specific requirements.

Cal Cities Position: *Support if Amended*

Accessory dwelling units (ADU)

SB 897 (Wieckowski) Accessory Dwelling Units.

This measure would require cities to allow ADUs to be constructed with a height of up to 25 feet, within one half mile of a major transit stop or high-quality bus corridor, and permit constructed ADUs that are in violation of state building standards and in violation of local zoning requirements.

Cal Cities Position: *Oppose*

AB 916 (Salas) Accessory Dwelling Units.

This measure would require cities increase the height maximum of ADUs from 16 to 18 feet on all parcels and to 25 feet for multifamily or single family parcel located within a half mile of transit. AB 916 also would add a provision which sets a minimum height requirement of 25 feet for ADUs that are attached to a primary single family residence.

Cal Cities Position: *Oppose Unless Amended*

Parking requirements

AB 2097 (Friedman) Residential and Commercial Development: Parking Requirements.

This measure would prohibit a local government from imposing or enforcing a minimum automobile parking requirement on specified residential, commercial, or other developments, if the development is located on a parcel within one-half mile of public transit.

Cal Cities Position: *Oppose*

Workers' compensation

SB 1127 (Atkins) Workers' Compensation: Liability Presumptions.

This measure would fundamentally alter longstanding rules and timeframes for determining eligibility for workers' compensation claims and would increase systemic friction and litigation. This measure would also impose massive new penalties on employers.

Cal Cities Position: *Oppose*

AB 1751 (Daly) Workers' Compensation: COVID-19: Critical Workers.

This measure would extend the sunset date on the existing workers' compensation presumption for COVID-19 by two years to January 1, 2025. We would remove our opposition if AB 1751 were amended to extend the presumption for only one year to January 1, 2024.

Cal Cities Position: *Oppose Unless Amended*

Labor relations

SB 931 (Leyva) Deterring Union Membership: Violations.

This measure would authorize an employee organization, or applicants to be public employees, to file a claim with the Public Employment Relations Board alleging a violation of Government Code section 3550, related to employer actions that may "deter or discourage" union membership.

Cal Cities Position: *Oppose Unless Amended*

Tax exemptions

AB 1951 (Grayson) Sales and Use Tax: Manufacturing Exemptions.

This measure would expand, for a five-year period, the existing partial sales and use tax exemption for manufacturing and research and development tangible personal property by making it a full exemption, including any local voter-approved transaction and use taxes.

The annual local government revenue loss is estimated at \$533 million.

Cal Cities Position: *Oppose Unless Amended*

AB 2887 (E. Garcia) Sales and Use Tax: Alternative Manufacturing Exemptions.

This measure would increase the annual sales and use tax exclusion limit by \$50 million (\$150,000,000) for eligible alternative energy and advance manufacturing.

The annual local government revenue loss exceeds \$25 million annually for 3 years.

Cal Cities Position: *Oppose Unless Amended*

AB 2622 (Mullin) Sales and Use Tax: Zero Emission Bus Exemption.

This measure would extend until 2026 the sales and use tax exemption provided to cities, counties, and transit agencies for zero emission transit buses

Cal Cities Position: *Support*

Tax credits

SB 843 (Glazer) Renters' Tax Credit.

This measure would increase the amount of the renter's credit to \$1,000 for spouses filing joint returns, head of household, and surviving spouse filers, and to \$500 for all other tax filers.

Cal Cities Position: *Support*

Annexations

SB 1449 (Caballero) Unincorporated Areas: Grant Program.

This measure would authorize grants to cities for infrastructure projects in proposed or completed annexations of a substantially surrounded unincorporated area. This measure is focused on supporting Disadvantaged Unincorporated Communities.

Cal Cities Position: *Support*



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: PACE Programs Activities Update: Purchase and Sale Agreement with First National Assets

Contact: Casey Dailey, Director of Energy & Environmental Programs, cdailey@wrcog.us, (951) 405-6720

Date: August 1, 2022

Requested Action(s):

1. Adopt Resolution Number 22-22; A Resolution of the Executive Committee of the Western Riverside Council of Governments approving a Purchase and Sale Agreement for the sale of Assessment Installment Receivables.
2. Authorize the Executive Director to enter into a Purchase and Sale Agreement, substantially as to form, with First National Assets for the purchase of delinquent assessment receivables.

Purpose:

The purpose of this item is to seek authorization to enter into a Purchase and Sale Agreement with First National Assets (FNA)

WRCOG 2022-2027 Strategic Plan Goal:

Goal #3 - Ensure fiscal solvency and stability of the Western Riverside Council of Governments.

Background:

WRCOG's PACE Programs provide financing to property owners to implement energy saving, renewable energy, water conservation, and seismic strengthening improvements. Improvements installed utilizing PACE financing are secured by placing a lien on the underlying property and are paid back through a line item charge on the secured property tax bill. The Program was initiated in December 2011 and was expanded in 2014 to allow jurisdictions throughout the state to join and allow property owners in these jurisdictions to participate.

Purchase and Sale Agreement for Delinquent Parcels

First National Assets (FNA) has offered to purchase the delinquencies from residential and commercial parcels of all PACE providers for Tax Year 2021/2022. FNA was initially selected through sole source as they had unique experience providing this financing as a backstop for other public entities. They were originally brought back in 2018/2019 after WRCOG experienced a shortfall of funds needed to pay the bonds in 2017. Consistent with prior years, staff is seeking adoption of Resolution Number 22-22 (Attachment 1) and the authorization for the Executive Director to enter into a Purchase and Sale Agreement.

The Agreement with FNA accomplishes two essential policy goals of the PACE Program. First, it ensures that WRCOG will not be in a position to initiate a judicial foreclosure proceeding on property owners with PACE assessments who have not paid their property tax payments on time. Second, it ensures that the PACE bond investors are paid on time, thus avoiding any negative credit or bond rating impacts to WRCOG.

There is a link between non-payment and foreclosure; if a property owner fails to make regular payments on their PACE assessment, they could be subject to a judicial foreclosure action. However, the Executive Committee made a policy to not be the cause of foreclosures on residential property owners. This policy places the financial burden on WRCOG to ensure that bonds are paid in full, regardless of where the funds come from. In early years of the Program, Renovate America would pay the difference between what was received through the payments of the assessments and what was owed on the bonds. However, in 2017, Renovate America refused to fill that gap, leaving WRCOG responsible for paying approximately \$350,000 on behalf of delinquent property owner to ensure bond payments were made in full. That was not sustainable, so FNA was brought in to fill the gap left by Renovate America.

It should be noted that it is only the delinquent amount that is assigned to FNA, not the entire amount of the assessment. In practice, FNA provides the funds so bonds can be paid in full. As individual property owners come current on their taxes, any fees or penalties associated with those late payments are assigned to FNA in consideration for FNA providing the funds to ensure bonds are paid.

As of July 2022, there were 507 delinquent residential assessments with a total delinquent assessment amount of \$1,143,539.75 and 13 delinquent commercial assessments with a total delinquent assessment amount of \$186,043.51 (Attachment 2). WRCOG will receive updated delinquent assessment numbers (assessment installment receivables schedule) by August 10, 2022. Those updated numbers will be included in the final Purchase and Sale Agreement and executed accordingly. The Purchase and Sale Agreement would be finalized on August 15, 2022, to allow the bond holders to be paid by the bond closing date of September 2, 2022.

Staff will report on the status of PACE delinquencies and request that the Executive Committee adopt a resolution approving the Purchase and Sale Agreement for the sale of assessment installment receivables. Entering into the Purchase and Sale Agreement would allow WRCOG to pay debt service payments in a timely manner to bond holders. According to the various indentures governing the series of PACE Bonds, WRCOG must determine whether any single participating parcel is delinquent in payment of any assessment installments by October 1, 2022, and within 60 days from such date, must either elect to defer or commence foreclosure proceedings. Staff will bring back an item at a future date to make such a determination.

Prior Action(s):

October 4 2021: The Executive Committee adopted Resolution Number 23-21; A Resolution of the Executive Committee of the Western Riverside Council of Governments waiving judicial foreclosure proceeding requirements for delinquent payments of assessments of the Energy Efficiency and Water Conservation Program for Western Riverside County and the California HERO Program

August 2, 2021: The Executive Committee 1) authorized the Executive Director to enter into a Purchase and Sale Agreement, substantially as to form, with First National Assets for the purchase of delinquent assessment receivables; and 2) adopt Resolution Number 21-21; A Resolution of the Executive

Committee of the Western Riverside Council of Governments approving a Purchase and Sales Agreement for the sale of Assessment Installment Receivables.

October 5, 2020: The Executive Committee adopted Resolution Number 27-20; A Resolution of the Executive Committee of the Western Riverside Council of Governments waiving judicial foreclosure proceeding requirements for delinquent payments of assessments of the Energy Efficiency and Water

August 3, 2020: The Executive Committee 1) authorized the Executive Director to enter into a Purchase and Sale Agreement, substantially as to form, with First National Assets for the purchase of delinquent assessment receivables; and 2) adopted Resolution Number 25-20; A Resolution of the Executive Committee of the Western Riverside Council of Governments approving a Purchase and Sale Agreement for the sale of Assessment Installment Receivables.

Fiscal Impact:

WRCOG will receive revenues a 7.5% fee as a result of this agreement, which will be booked under HERO Administration revenue. The exact amount is not known at this time; however an estimated amount of revenue of approximately \$100k was included in the FY 22/23 budget under the General Fund (Fund 110) under the HERO Program.

Attachment(s):

[Attachment 1 - Resolution Number 22-22 Approving Purchase and Sale Agreement](#)

[Attachment 2 - PACE Delinquency Detail \(FY 2021/2022\) Purchase Exhibit](#)

Attachment

Resolution Number 22-22; Approving
Purchase and Sale Agreement for the
Sale of Assessment Installment
Receivables

RESOLUTION NUMBER 22-22

A RESOLUTION OF THE EXECUTIVE COMMITTEE OF THE WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS APPROVING A PURCHASE AND SALE AGREEMENT FOR THE SALE OF ASSESSMENT INSTALLMENT RECEIVABLES

WHEREAS, the Western Riverside Council of Governments (“WRCOG”) has levied assessments under Chapter 29 of Part 3 of Division 7 of the California Streets and Highways Code (commencing with Section 5898.12 et seq.) (“Chapter 29”). Such assessments are payable in installments under the Improvement Bond Act of 1915, Division 10 of Part I (commencing with Section 8500) of the California Streets and Highways Code (“1915 Act”) on residential and commercial properties participating in the Energy Efficiency and Water Conservation Program for Western Riverside County and the California HERO Program established by WRCOG pursuant to Chapter 29 and the 1915 Act (collectively, the “WRCOG Program”), which are collected on the secured property tax roll of the County of Riverside; and

WHEREAS, certain installments of such assessments are delinquent; and

WHEREAS, WRCOG and FNA California, LLC desire to enter into that certain Purchase and Sale Agreement (the “Agreement”) pursuant to which WRCOG will sell to FNA California, LLC, certain rights WRCOG is entitled to receive arising from the collection of certain delinquent assessments for the tax years specified in this Purchase and Sale Agreement attached hereto as Exhibit “A” and incorporated herein by reference; and

WHEREAS, WRCOG has determined that it is in the best interests of WRCOG at this time to enter into the Agreement in substantially similar form to that attached hereto as Exhibit “A” and incorporated herein by reference.

NOW, THEREFORE, BE IT RESOLVED by the Executive Committee of the Western Riverside Council of Governments as follows:

Section 1. The above recitals are true and correct.

Section 2. The Executive Committee of the Western Riverside Council of Governments hereby approves as to form the Agreement attached hereto as Exhibit "A" and incorporated herein by reference and authorizes the Executive Director to make any changes he deems necessary in consultation with Best Best & Krieger as bond counsel and DTA, as assessment administrator.

PASSED AND ADOPTED at a meeting of the Executive Committee of the Western Riverside Council of Governments held on August 1, 2022.

Crystal Ruiz, Chair
WRCOG Executive Committee

Dr. Kurt Wilson, Secretary
WRCOG Executive Committee

Approved as to form:

Best Best & Krieger, LLP
Bond Counsel

AYES: _____ NAYS: _____ ABSENT: _____ ABSTAIN: _____

EXHIBIT "A"

Purchase and Sale Agreement

PURCHASE AND SALE AGREEMENT

Dated as of August 15, 2022

between

WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS,

as Seller

and

FNA CALIFORNIA, LLC,

as Purchaser

**Regarding
Assessment Installment Receivables
for the 2021-2022 Tax Year**

TABLE OF CONTENTS

	Page
Purchase and Sale Agreement	1
Background	1
Article I Definitions	2
Section 1.01 Definitions.....	2
Section 1.02 Other Definitional Provisions.....	6
Section 1.03 Term of this Agreement	7
Article II Purchase and Sale of Assessment Installment Receivables	7
Section 2.01 Purchase and Sale of Assessment Installment Receivables; Assignment of Rights.....	7
Section 2.02 Closing Conditions.....	8
Section 2.03 Right to Terminate	9
Section 2.04 Pledge	9
Section 2.05 Release of Collateral upon Repurchase of Assessment Installment Receivables.....	10
Article III The Assessment Installment Receivables	10
Section 3.01 Representations, Warranties and Covenants as to the Assessment Installment Receivables.....	10
Section 3.02 Enforcement and Collection; Assignment of Rights	14
Article IV WRCOG	16
Section 4.01 Representations of WRCOG.....	16
Section 4.02 Additional Representations and Agreements	18
Section 4.03 Representations of Company	19
Article V Miscellaneous	20
Section 5.01 Amendment	20
Section 5.02 Entire Agreement.....	21
Section 5.03 Notices	21
Section 5.04 No Assignment by WRCOG.....	21
Section 5.05 Limitations on Rights of Others.....	21
Section 5.06 Severability	21
Section 5.07 Separate Counterparts	21
Section 5.08 Headings	22
Section 5.09 Governing Law and Venue	22
Section 5.10 Nonpetition Covenants	23

PURCHASE AND SALE AGREEMENT

THIS PURCHASE AND SALE AGREEMENT (this "Agreement"), dated as of August 15, 2022, between Western Riverside Council of Governments, a joint exercise of powers authority and existing under the Joint Exercise of Powers Act, being Chapter 5 of Division 7, Title 1 of the Government Code of the State of California and a Joint Exercise of Powers Agreement originally made and entered into as of April 1, 1991, as further amended to date ("WRCOG"), and FNA California, LLC, an Illinois limited liability company ("Company").

BACKGROUND

WRCOG has levied assessments under Chapter 29 (as defined below) payable in installments under the 1915 Act (defined below) on residential and commercial properties participating in the WRCOG Program (as defined below) which are collected on the secured property tax roll of the County (as defined below) in which the participating properties are located.

Certain installments of such assessments are delinquent (the "Assessment Installment Receivables") as of the Cut-off Date (as defined below).

WRCOG has determined that it is in the best interests of WRCOG at this time to sell to the Company the Assessment Installment Receivables it is entitled to receive arising from the collection of certain delinquent assessments for the tax years specified in this Agreement, upon the terms and conditions provided herein.

NOW, THEREFORE, for and in consideration of the premises and the material covenants hereinafter contained, the parties hereto hereby formally covenant, agree and bind themselves as follows:

Article I Definitions

Section 1.01 Definitions. Whenever used in this Agreement, the following words and phrases, unless the context otherwise requires, shall have the following meanings:

“1915 Act” means the Improvement Bond Act of 1915, Division 10 of Part I (commencing with Section 8500) of the California Streets and Highways Code.

“Agreement” means this Purchase and Sale Agreement, as originally executed or as it may from time to time be supplemented, modified or amended in accordance with the provisions hereof.

“Assessment” means each “Assessment” as defined in an Assessment Contract and levied pursuant to such Assessment Contract against a Property (as defined below) to which such Assessment Contract is subject.

“Assessment Administrative Fee” means, as to each Property, the assessment administrative fee due and payable pursuant to the applicable Assessment Contract that shall be collected on the property tax bill pertaining to such Property.

“Assessment Administrator” means David Taussig & Associates, and its successors, or any financial consultant or firm of such financial consultants judged by WRCOG to have experience in the administration for and on behalf of public agencies of assessments similar to the Assessments levied by such public agencies in the State of California.

“Assessment Contract” shall have the meaning given such term in the applicable Master Indenture.

“Assessment Installment” means, as to each Property, the portion of the principal amount of an Assessment, together with the interest on the Assessment, due and payable pursuant to an Assessment Contract that shall be collected on the property tax bill for a particular Tax Year pertaining to such Property.

“Assessment Installment Receivable” means, with respect to a Property for a particular Tax Year, the Assessment Installment and the related Assessment Administrative Fee on the secured tax roll of the County that:

(i) was levied by WRCOG on one of the Properties listed on the Assessment Installment Receivables Schedule for such Tax Year in accordance with the Chapter 29, the 1915 Act and the applicable Assessment Contract and is payable to WRCOG if and when collected,

(ii) was levied on account of the applicable Purchased Tax Year, was delinquent as of the Cut-off Date and was shown as such on the Delinquent Tax Roll maintained by the County for the applicable Purchased Tax Year,

(iii) had not been received by WRCOG or the Trustee, on behalf of WRCOG, as of the Cut-off Date,

(iv) is due and owing to WRCOG in an amount equal to the amount of such Assessment Installment and Assessment Administrative Fee, penalties and accrued interest set forth on the Assessment Installment Receivables Schedule,

(v) includes, to the extent permitted by law and the terms of the applicable Master Indenture, all penalties and accrued interest thereon to the date of collection, and

(vi) has not become a Defective Assessment Installment Receivable.

“Assessment Installment Receivable Balance” means, with respect to an Assessment Installment Receivable as of a particular date, the sum of

(i) an amount equal to the delinquent Assessment Installments and Assessment Administrative Fees levied by or on behalf of WRCOG and payable to the WRCOG with respect to such Assessment Installment Receivable as shown on the Assessment Installment Receivables Schedule,

(ii) to the extent permitted by law and the applicable Master Indenture, the ten percent (10%) penalty payable on the Assessment Installment Receivable in accordance with Sections 2617 and 2618 of the California Revenue and Taxation Code, and

(iii) to the extent permitted by law and the applicable Master Indenture, interest accrued on the amount in clause (A) from the July 1 of the Tax Year following the Tax Year in which such Assessment Installment Receivable first became delinquent through the date of determination at the rate of one and half percent (1.5%) per month in accordance with Section 4103 of the California Revenue and Taxation Code.

“Assessment Installment Receivables Schedule” means the schedule attached as (or incorporated by reference in) EXHIBIT A hereto, as such schedule may be amended from time to time in accordance with Section 3.01(e) hereof, with respect to the Assessments levied on the Properties described on EXHIBIT A hereto.

“Assessment Installments Purchased” has the meaning set forth in Section 2.01(a) hereof.

“Assessment Lien” means any lien that attaches, by operation of Section 2187 of the California Revenue and Taxation Code, to the fee interest in real property.

“Associate Member” any Associate Member of WRCOG that is participating in the California HERO Program.

“Bond Counsel” means Best Best & Krieger LLP or any other attorney or firm of attorneys of nationally recognized expertise with respect to legal matters relating to public financing in the State.

“Business Day” means any day that is not a Saturday, Sunday or other day on which commercial banking institutions in New York or California are authorized or obligated by law or executive order to be closed.

“Chapter 29” means Chapter 29 of Part 3 of Division 7 of the California Streets and Highways Code (commencing with Section 5898.12 et seq.)

“Closing Date” means August 15, 2022.

“Collections” means, with respect to an Assessment Installment Receivable, the amount collected by the County (whether as payments by the related Property Owner in a lump sum, payments by the related Property Owner pursuant to an installment payment plan, as proceeds of sale of the related tax-defaulted Property, or otherwise) on the Assessment Installment Receivable. Collections include but are not limited to the following:

- (i) the delinquent Assessment Installments payable for the Tax Year to which the Assessment Installment Receivable is related,
- (ii) the ten percent (10%) penalty payable thereon in accordance with Sections 2617 and 2618 of the California Revenue and Taxation Code,
- (iii) interest accruing at the rate of one and half percent (1.5%) per month in accordance with Section 4103 of the California Revenue and Taxation Code, and
- (iv) all Assessment Administrative Fees levied in connection therewith that are distributable to WRCOG, if any.

“Company” means FNA California, LLC, a limited liability company organized and existing under the laws of the state of Illinois or any successor thereto.

“County” means the County of Riverside, California, and each county of the Associate Members, which could include the unincorporated area of any county which is an Associate Member.

“Cut-off Date” means August 10, 2022.

“Defective Assessment Installment Receivable” has the meaning set forth in Section 3.01(c) hereof.

“Defective Assessment Installment Receivable Purchase Amount” means, as to any Defective Assessment Installment Receivable, an amount equal to the Purchase Price and Premium of such Defective Assessment Installment Receivable set forth on the Assessment Installment Receivables Schedule reduced by the amount, if any, of Collections on such Defective Assessment Installment Receivable which have been applied to the recovery of such Purchase Price and Premium and paid to the Company as of the date of calculation.

“Delinquent Tax Roll” means the delinquent tax roll which is delivered by the Treasurer-Tax Collector of the County to the Auditor-Controller of the County pursuant to Section 2627 of the Revenue and Taxation Code of the State, or such other report, file or data of the Treasurer-Tax Collector or Auditor-Controller of the County as may be available from the County and mutually satisfactory to WRCOG and the Company.

“Master Indenture” means, as applicable, each of the master indentures listed on EXHIBIT B, incorporated herein by reference.

“Opinion of Counsel” means one or more written opinions of counsel, who may be an employee of or counsel to WRCOG, which counsel shall be acceptable to the recipient of such opinion or opinions.

“Person” any individual, corporation, partnership (general or limited), limited liability company, limited liability partnership, firm, joint venture, association, joint-stock company, trust, estate, unincorporated organization, governmental body or other entity.

“Premium” has the meaning set forth in Section 2.01(a) hereof.

“Property” means, with respect to an Assessment Installment Receivable, either a residential or commercial parcel of real property that is encumbered by the Assessment Lien of such Assessment Installment Receivable.

“Property Owner” means, with respect to an Assessment Installment Receivable, the fee owner or owners of the related Property.

“Purchase Price” has the meaning set forth in Section 2.01(a) hereof.

“Purchased Tax Year” means, for a given Assessment Installment Receivable, the Tax Year ending on June 30 of the applicable calendar year, as set forth in EXHIBIT A hereto.

“Purchased Receivables” means the Assessment Installment Receivables listed on the Assessment Installment Receivables Schedule and purchased by the Company pursuant to this Agreement.

“Responsible Officer” means, with respect to WRCOG, the Executive Director, the Chief Financial Officer, Director of Energy and Environmental Programs of WRCOG or any other official of WRCOG customarily performing functions similar to those performed by any of the above designated officials, and also with respect to a particular matter, any

other official of WRCOG to whom such matter is referred because of such official's knowledge of and familiarity with the particular subject.

"State" means the State of California.

"Tax Year" means the 12-month period beginning on July 1 in any year and ending on the following June 30. Whenever in this Agreement reference is made to the Tax Year of a certain year, such reference is to the Tax Year ending June 30 of that year.

"Trustee" shall mean Deutsche Bank National Trust Company, a national banking association duly organized and existing under the laws of the United States of America, acting as trustee and not in its individual capacity, its successors and assigns, and any other corporation or association which may be at any time substituted in its place, as provided in the applicable Master Indenture.

"WRCOG" means Western Riverside Council of Governments, a joint exercise of powers authority organized and existing under the laws of the State, including any entity with which it may be consolidated or which otherwise succeeds to the interests of WRCOG.

"WRCOG Program" means the Energy Efficiency and Water Conservation Program for Western Riverside County and the California HERO Program established by WRCOG pursuant to Chapter 29 and the 1915 Act.

Section 1.02 Other Definitional Provisions.

(a) All terms defined in this Agreement shall have the defined meanings when used in any certificate or other document made or delivered pursuant hereto unless otherwise defined therein.

(b) As used in this Agreement and in any certificate or other document made or delivered pursuant hereto or thereto, accounting terms not defined in this Agreement or in any such certificate or other document, and accounting terms partly defined in this Agreement or in any such certificate or other document to the extent not defined, shall have the respective meanings given to them under generally accepted accounting principles. To the extent that the definitions of accounting terms in this Agreement or in any such certificate or other document are inconsistent with the meanings of such terms under generally accepted accounting principles, the definitions contained in this Agreement or in any such certificate or other document shall control.

(c) The words "hereof", "herein", "hereunder" and words of similar import when used in this Agreement shall refer to this Agreement as a whole and not to any particular provision of this Agreement; Article, Section, Schedule and Exhibit references contained in this Agreement are references to Articles, Sections, Schedules and Exhibits in or to this Agreement unless otherwise specified; and the term "including" shall mean "including without limitation."

(d) The definitions contained in this Agreement are applicable to the singular as well as the plural forms of such terms and to the masculine as well as to the feminine and neuter genders of such terms.

(e) Any agreement, instrument or statute defined or referred to herein or in any instrument or certificate delivered in connection herewith means such agreement, instrument or statute as from time to time amended, modified or supplemented and includes (in the case of agreements or instruments) references to all attachments thereto and instruments incorporated therein; references to a Person are also to its permitted successors and assigns.

Section 1.03 Term of this Agreement.

This Agreement shall remain in full force and effect for the period during which any of the Assessment Installment Receivables purchased under this Agreement remains outstanding.

Article II

Purchase and Sale of Assessment Installment Receivables

Section 2.01 Purchase and Sale of Assessment Installment Receivables; Assignment of Rights.

(a) *Purchase and Sale.* In consideration of the Company's promise to deliver on the Closing Date to or upon the order of WRCOG the sum of \$_____ (the "Purchase Price"), which is equal to the principal amount of \$_____ of the delinquent Assessment Installments included in Assessment Installment Receivables to be purchased ("Assessment Installments Purchased"), plus a premium equal to seven and a half percent (7.5%) of the Assessment Installments Purchased (the "Premium") in the amount of \$_____, WRCOG does hereby sell, transfer, assign, set over and otherwise convey to the Company, without recourse (but subject to the obligations herein), all right, title and interest of WRCOG on the Closing Date, free and clear of all liens, claims and interest, whether now owned or hereinafter acquired, in and to:

(i) the Assessment Installment Receivables;

(ii) all Collections in respect of the Assessment Installment Receivables since the Cut-off Date; and

(iii) the proceeds of any and all of the foregoing.

(b) *Collections.* The Company shall be entitled, from and after the Closing Date, to receive all Collections with respect to the Assessment Installment Receivables.

(c) *Payment and Application of Purchase Price.* On the Closing Date, the Company shall pay or cause to be paid the Purchase Price, together with the Premium thereon, in immediately available funds by federal funds wire to or upon the order of

WRCOG. WRCOG covenants that (i) it shall treat the Purchase Price as Assessments or Assessment Administrative Fees, as applicable, for all purposes under the terms of the applicable Master Indenture or other document by which any bonds, notes or other evidences of indebtedness were issued and secured by the Assessments to which the Assessment Installment Receivables relate, and (ii) it shall apply the Purchase Price to the payment of the bonds secured by the Assessments to which the Assessment Installment Receivables relate, and to the other authorized purposes to which the Assessments or the Assessment Administrative Fees may be applied (including without limitation replenishment of reserve funds and payment of administrative expenses), to the same extent that the proceeds of the Assessments and Assessment Administrative Fees constituting the Assessment Installment Receivables would have been required to be applied had they been paid by the respective property owner before delinquency and received by WRCOG.

Section 2.02 Closing Conditions. The obligation of the Company to purchase the Assessment Installment Receivables and pay the Purchase Price, together with the Premium thereon, will be subject to the accuracy of the representations and warranties of WRCOG herein, to the accuracy of statements to be made by or on behalf of WRCOG, to the performance by WRCOG of its obligations hereunder and to the following additional conditions precedent:

(a) *Executed Agreement.* At the Closing Date, this Agreement must have been authorized, executed and delivered by the respective parties thereto, and this Agreement and all official actions of WRCOG relating thereto must be in full force and effect and not have been amended, modified or supplemented.

(b) *Closing Documents.* The Company must receive the following opinions and certificates (which may be consolidated into a single certificate for convenience), dated the Closing Date and acceptable to the Company:

(i) *Legal Opinion of Bond Counsel.* An approving opinion of Bond Counsel to the effect that the obligations of WRCOG under this Agreement are valid, binding and enforceable, and as to certain other matters, addressed to, and in form and substance satisfactory to, WRCOG and the Company.

(ii) *Certificate of WRCOG.* A certificate signed by an appropriate official of WRCOG to the effect that:

(A) WRCOG is duly organized and validly existing as a joint exercise of powers authority under the Joint Exercise of Powers Act, being Chapter 5 of Division 7, Title 1 of the Government Code of the State of California and a Joint Exercise of Powers Agreement originally made and entered into as of April 1, 1991, as further amended to date,

(B) the representatives of WRCOG who executed this Agreement have been duly authorized to do so on behalf of WRCOG,

(C) the representations, agreements and warranties of WRCOG herein are true and correct in all material respects as of the Closing Date,

(D) WRCOG has complied with all the terms of this Agreement which are required to be complied with by WRCOG prior to or concurrently with the Closing Date, and

(E) the execution and delivery of this Agreement have been approved by the governing board of WRCOG, which approval was duly and regularly adopted in accordance with all applicable legal requirements.

Section 2.03 Right to Terminate. If WRCOG is unable to satisfy the conditions set forth in Section 2.02(a) and (b) hereof, as reasonably determined by the Company, this Agreement may be canceled either in part or in its entirety by the Company at any time. Notice of such cancellation shall be given to WRCOG in writing, or by telephone call confirmed in writing. Upon receipt of a notice of cancellation pursuant to this Section 2.03, WRCOG shall remit the full Purchase Price, together with the Premium thereon, to and upon the order of the Company.

Section 2.04 Pledge. Although the parties hereto intend that the sale of the Assessment Installment Receivables by WRCOG to the Company be characterized as an absolute sale rather than a secured borrowing, if the sale of the Assessment Installment Receivables is deemed to be a secured borrowing, then in order to secure WRCOG's obligations to the Company hereunder, WRCOG takes the actions set forth below.

(a) WRCOG hereby pledges, assigns and grants a lien to the Company on the following (the "Collateral"):

- (i) the Assessment Installment Receivables;
- (ii) the Collections; and
- (iii) all proceeds of the foregoing.

(b) WRCOG represents and warrants to the Company that:

- (i) this Agreement creates a valid and continuing lien on the Collateral in favor of the Company, which is prior to all other liens, and is enforceable as such as against creditors of and purchasers from WRCOG;

(ii) WRCOG owns and has good and marketable title to the Collateral free and clear of any lien, claim or encumbrance of any person subject to the provisions of the applicable Master Indenture;

(iii) other than the lien granted to the Company pursuant to this Agreement, WRCOG has not pledged, assigned, sold, granted a lien on, or otherwise conveyed any of the Collateral; and

(iv) WRCOG is not aware of any judgment or tax lien filings against WRCOG.

These representations and warranties shall survive the Closing and may not be waived.

Section 2.05 Release of Collateral upon Repurchase of Assessment Installment Receivables. Any Assessment Installment Receivable that is repurchased by WRCOG in accordance with this Agreement shall be released from the Collateral when the required payment is made pursuant to Section 3.01(e) of this Agreement. Promptly upon such release, the Company shall amend the Assessment Installment Receivables Schedule to reflect the release of such Assessment Installment Receivable from the terms of this Agreement. Such Assessment Installment Receivable shall cease to be a part of the Collateral and be released from, and no longer be subject to, the pledge of this Agreement. The Company agrees to take or cause to be taken such actions and to execute, deliver and record such instruments and documents as may be set forth in a written request of WRCOG to release such Assessment Installment Receivable from the lien of this Agreement.

Article III

The Assessment Installment Receivables

Section 3.01 Representations, Warranties and Covenants as to the Assessment Installment Receivables.

(a) *Representations and Warranties.* WRCOG hereby represents and warrants to the Company that to WRCOG's knowledge (1) as of the Closing Date for the Assessment Installment Receivables, the information set forth in the Assessment Installment Receivables Schedule will be correct in all material respects, and (2) as to each Assessment Installment Receivable transferred hereunder, as of the Closing Date:

(i) WRCOG was the sole owner of such Assessment Installment Receivable;

(ii) WRCOG has full right and authority to sell such Assessment Installment Receivable as provided in this Agreement;

(iii) WRCOG sold such Assessment Installment Receivable free and clear of any and all liens, pledges, charges, security interests or any other statutory impediments to transfer created by or imposed upon

WRCOG encumbering such Assessment Installment Receivable (but subject to the right of redemption by the related Property Owner), except for liens that will be discharged by the application of the proceeds of the sale thereof;

(iv) the sale of such Assessment Installment Receivable by WRCOG did not contravene or conflict with any laws, rules or regulations applicable to WRCOG;

(v) the Assessment Installments and Assessment Administrative Fees of which the Assessment Installment Receivable constitutes a portion were validly levied by WRCOG and, to the best knowledge of WRCOG and its agents and representatives, also validly levied and collected by the County on the secured property tax roll on behalf of WRCOG, in accordance with all applicable provisions of the laws, rules and regulations of the State, the County and of the United States;

(vi) the amount of the Assessment Installment Receivable includes Assessment Installments and Assessment Administrative Fees on the secured tax roll which have been levied by WRCOG and by the County on the secured property tax roll on behalf of WRCOG during the applicable Purchased Tax Year which were delinquent as of the Cut-off Date;

(vii) the Assessment Installment Receivable was secured by a legal, valid, binding and enforceable lien on the related Property;

(viii) the lien of the Assessment Installment Receivable represented a valid, proper and enforceable lien on the related Property, the priority of which was subject only to other Assessment Liens on such Property and to certain other priorities prescribed by statute;

(ix) the amount of such Assessment Installment Receivable includes a ten percent (10%) penalty imposed pursuant to Revenue & Taxation Code Section 2617 and/or 2618 on the portion of such Assessment Installment Receivable consisting of the delinquent Assessment Installment(s) and the delinquent Assessment Administrative Fee(s);

(x) interest payable by the related Property Owner has accrued and will continue to accrue on the delinquent Assessment Installments and Assessment Administrative Fees of which the Assessment Installment Receivable constitutes a portion from July 1 of the Tax Year following the Tax Year in which such Assessment Installment Receivable first became delinquent to the date of payment of such Assessment Installments Receivable at the rate of one and a half percent (1.5%) per month (not compounded) as provided in California Revenue and Taxation Code Section 4103;

(xi) such Assessment Installment Receivable had not been discharged or disallowed (in whole or in part) in a bankruptcy proceeding;

(xii) such Assessment Installment Receivable had not been compromised, adjusted or modified (including by the granting of any discounts, allowances or credits, but not including installment payment plans in accordance with law);

(xiii) such Assessment Installment Receivable was not subject to a foreign government's diplomatic immunity from enforcement or treaty with the United States of America;

(xiv) there existed no fact, condition or circumstance that would prevent the County from being able to sell the related Property in a tax sale upon the expiration of a period of five years from July 1 of the Tax Year after the Tax Year in which the Assessment Installments became delinquent;

(xv) no right of rescission, setoff, counterclaim or defense had been asserted with respect to such Assessment Installment Receivable;

(xvi) WRCOG has not received notice that such Assessment Installment Receivable relates to a Property owned by a Property Owner that is subject to any bankruptcy proceeding commenced prior to the Closing Date;

(xvii) such Assessment Installment Receivable does not relate to a Property owned by a federal, state, or local governmental entity;

(xviii) WRCOG had not waived any penalties or interest with respect to such Assessment Installment Receivable;

(xix) each of the requirements included in the definition of "Assessment Installment Receivable" is satisfied with respect to such Assessment Installment Receivable; and

(xx) none of the exclusion criteria set forth in EXHIBIT C are applicable to such Assessment Installment Receivable unless, as of the Closing Date, any such criteria has been expressly waived in writing by the Company.

(b) Survival of Representations and Warranties; Liability of WRCOG.

(i) It is understood and agreed that the representations and warranties set forth in this Section 3.01, Section 2.04, Section 4.01 and Section 4.02 shall survive the consummation of the sale of the Assessment Installment Receivables on the Closing Date and shall inure to the benefit of the Company.

(ii) It is understood and agreed that the representations and warranties made by WRCOG in Section 3.01(a) hereof are made solely for the purpose of determining the existence of a Defective Assessment Installment Receivable, and in no case shall WRCOG or any of its officers or employees have any liability if it was subsequently discovered that such representations and warranties were in fact false at the time they were made, other than the obligation of WRCOG to repurchase Defective Assessment Installment Receivables as provided in this Agreement.

(c) *Defective Assessment Installment Receivables.* Upon discovery by WRCOG or the Company (based on information provided by the County, examination of the Delinquent Tax Roll, or otherwise) of a breach of any of the foregoing representations and warranties (without regard to any knowledge qualifier) that materially and adversely affects the value of any Assessment Installment Receivable (such Assessment Installment Receivable, a “Defective Assessment Installment Receivable”), the party making such discovery shall immediately notify WRCOG or the Company of such discovery and describe in reasonable detail the representations and warranties that were breached.

The Company may, at its option, require WRCOG to repurchase the Defective Assessment Installment Receivable. Under no circumstances will WRCOG have the right to require the resale of a Defective Assessment Installment Receivable to the Company. WRCOG shall have no right to substitute another Assessment Installment Receivable for a Defective Assessment Installment Receivable.

If the Company elects to require WRCOG to repurchase a Defective Assessment Installment Receivable, the Company shall give written notice to WRCOG. Such notice must (i) identify the Defective Assessment Installment Receivable, (ii) if the Assessment Installment Receivable Balance as of the Closing Date is determined to be less than the amount thereof shown on the Assessment Installment Receivables Schedule, state the amount of such deficiency and (iii) be accompanied by documentation from the County which reasonably establishes the factual basis for the determination of the breach. WRCOG shall fully cooperate (at its own expense), or utilize all reasonable efforts to cause the County to cooperate, as reasonably requested by the Company in the investigation and reporting of the foregoing matters.

For purposes of clause (ii) of the preceding paragraph, if the adjustments to the Assessment Installment Receivable Balance result from adjustments to the Delinquent Tax Roll provided by the County, the Company will use its best reasonable efforts to obtain the reason(s) for the adjustments from the County, but if the Company is unable to obtain such reasons despite using its best reasonable efforts to do so, such inability shall not be grounds for rejection or disallowance of the adjustment.

(d) *Effect of Reduced Assessment Installment Receivable Amount.* If any Assessment Installment Receivable becomes a Defective Assessment Installment Receivable solely as a result of the determination that the Assessment Installment Receivable Balance as of the Closing Date (or applicable repurchase date) was less than

the amount set forth on the Assessment Installment Receivables Schedule, then only the amount of the reduction of such Assessment Installment Receivable shall be deemed to be repurchased and such Assessment Installment Receivable, at its reduced Assessment Installment Receivable Balance, shall continue to be an Assessment Installment Receivable for all purposes of this Agreement.

(e) *Cure or Purchase of Defective Assessment Installment Receivables.* As to any Defective Assessment Installment Receivable, on or prior to the next date on which WRCOG receives the normal payments of Assessment Installments and Assessment Administrative Fees from the County following the day on which it is discovered that what was supposed to be an Assessment Installment Receivable is, in fact, a Defective Assessment Installment Receivable, WRCOG shall, at its option, either (A) cure or cause to be cured such breach or (B) pay to the Company, in immediately available funds, the Defective Assessment Installment Receivable Purchase Amount.

If any Assessment Installment Receivable is determined to be a Defective Assessment Installment Receivable prior to the Closing Date, the Defective Assessment Installment Receivable Purchase Amount shall be subtracted from the Purchase Price and Premium payable to WRCOG on the Closing Date.

The obligations of WRCOG under this Section 3.01(e) shall constitute the sole remedies available to the Company with respect to a Defective Assessment Installment Receivable and WRCOG shall not incur any other liability to the Company or any other Person because of any inaccuracy of any representation or warranty made under this Section 3.01 with respect to the Assessment Installment Receivables. Upon the repurchase of a Defective Assessment Installment Receivable by WRCOG, the Company shall cause the Assessment Installment Receivables Schedule to be amended to delete the Defective Assessment Installment Receivable, and WRCOG shall have no further liabilities or obligations with respect to such Defective Assessment Installment Receivable.

(f) *Company's Calculation of Defective Assessment Installment Receivables.* The Company shall cause the Company's calculations and/or recalculations of any adjustments made under this Section 3.01 (herein, "Adjustments") to be delivered to WRCOG. WRCOG shall have ten (10) Business Days after delivery thereof to review the Adjustments and submit to the Company any objections and deliver revised Adjustments to WRCOG. If WRCOG does not respond to any such Adjustments (as they may be revised) within ten (10) Business Days after delivery, such Adjustments shall be deemed final and binding on WRCOG, and WRCOG shall remit any payment required by Section 3.01(e).

Section 3.02 Enforcement and Collection; Assignment of Rights.

(a) *Enforcement Rights of the Company.* Except as provided herein, the Company shall be entitled to assert all right, title, and interest of WRCOG in the enforcement and collection of the Purchased Receivables, including but not limited to WRCOG's lien priority, and WRCOG's right to receive the Collections on the Purchased

Receivables. Notwithstanding the foregoing, the Company acknowledges that Streets & Highways Code Section 5898.28(b)(2) provides that (i) the Company is not authorized to initiate and prosecute a judicial foreclosure action upon the Properties securing the payment of the Purchased Receivables and (ii) prosecution of such a judicial foreclosure action remains the responsibility of WRCOG.

From and after the receipt by WRCOG of the Purchase Price on the Closing Date, WRCOG shall have no rights whatsoever in and to the Purchased Receivables, including but not limited to the right to receive any Collections in respect of the Purchased Receivables, except with respect to Defective Assessment Installment Receivables repurchased by WRCOG in accordance with Section 3.01 hereof.

WRCOG shall cooperate fully with the Company as may be reasonably required by the Company to exercise any enforcement rights granted to the Company under this Agreement. WRCOG shall take all actions as may be reasonably required by law, including but not limited to the initiation of judicial foreclosure proceedings upon the request of the Company upon the Properties securing the payment of the Purchased Receivables upon behalf of the Company as provided for herein, fully to preserve, maintain, defend, protect and confirm the interests of the Company in the Purchased Receivables and the Collections. Any such enforcement actions, including judicial foreclosure proceedings, required to be undertaken by WRCOG at the Company's request shall be at the sole expense of the Company. If the cost of any such enforcement action is recovered by WRCOG such funds shall first be used to reimburse WRCOG for any such costs that have not been paid by the Company and, upon reimbursement of WRCOG for all such costs, such remaining funds shall be used to reimburse the Company for such costs as have been paid by the Company.

The Company and WRCOG agree that the primary means of enforcement of the payment of a Purchased Receivable shall be a tax sale by the County in which the Property securing such Purchased Receivable is located pursuant to the applicable provisions of Part 6 of Division 1 of the California Revenue and Taxation Code (the "R&T Code"). The Company shall initially forebear from requesting WRCOG to initiate judicial foreclosure proceedings upon any Property securing the payment of a Purchased Receivable for a period of four (4) years from the date of the original delinquency of the Purchased Receivable. If the County in which such Property is located fails to attempt to sell such Property within two (2) years from the date such Property can be sold at a tax sale pursuant to R&T Code Section 3691, the Company may request that WRCOG initiate judicial foreclosure proceedings to secure the payment of the Purchased Receivable and WRCOG shall be obligated to initiate such proceedings.

(b) *Change of Records; Further Actions and Assurances.* On or before the Closing Date, WRCOG shall mark its appropriate records so that, from and after the Closing Date, records of WRCOG shall indicate that such Purchased Receivables have been sold. WRCOG hereby agrees to (i) execute, deliver and cause to be approved and/or recorded all documents, and take all actions, as may be required to assign the Purchased Receivables and the Collections to the Company under this Agreement, and to notify the County of the assignments made under this Agreement, and (ii) execute,

deliver and cause to be approved all amendments to any documents under which bonds or other debt secured by the Purchased Receivables were issued as may be required to assign the Purchased Receivables and the Collections to the Company under this Agreement, and to notify any applicable bond trustee, fiscal agent or payment agent of the assignments made under this Agreement.

(c) *Administration and Remittances of Collections.* WRCOG shall take all commercially reasonable best efforts as may be required to cause the Collections, when remitted by the County to WRCOG, to be remitted as soon as reasonably possible, and in any event not less frequently than once per calendar year, by or on behalf of WRCOG to the Company by federal funds wire transfer to the following account:

CIBC Bank USA
ABA 071006486
Acct Number: 2202292
Acct Name: Elm Limited LLC

If the Company becomes aware of Collections that have been remitted by the County to WRCOG and not paid to the Company, the Company may notify WRCOG in writing and WRCOG agrees to take all actions required to remit those Collections to the Company as soon as reasonably possible. If any Collections received by WRCOG from the County are not remitted to the Company within ten (10) business days of such notice, WRCOG agrees to pay to the Company upon demand interest on the amount of such unpaid Collections at the rate of ten percent (10%) per annum for each day such Collections remain unpaid after such date.

WRCOG shall cause all notices and reports relating to the Purchased Receivables to be provided to the Company as and when they are available from WRCOG, the Trustee or the Assessment Administrator. In addition, WRCOG shall provide, or cause the Assessment Administrator to provide monthly reporting to the Company on the status of Assessment Installment Receivables, cash reconciliations, and such other similar reports as the Company may reasonably request to enable the Company to account for the Assessment Installment Receivables. The costs of providing such notices and reports as described in this paragraph shall be borne by WRCOG.

(d) *Covenant Not to Waive Penalties.* WRCOG agrees not to waive all or any portion of delinquency penalties and redemption penalties as permitted by any provision of applicable law with respect to any delinquent Assessment Installments included within the Purchased Receivables.

Article IV WRCOG

Section 4.01 Representations of WRCOG. WRCOG makes the following representations on which the Company is deemed to have relied in acquiring the Assessment Installment Receivables. The representations speak as of the Closing Date,

and shall survive the sale of the Assessment Installment Receivables to the Company and the pledge thereof to the Company pursuant to this Agreement.

(a) *Due Organization, Existence and Company.* WRCOG is a joint exercise of powers authority, duly organized and validly existing under the Joint Exercise of Powers Act, being Chapter 5 of Division 7, Title 1 of the Government Code of the State of California and a Joint Exercise of Powers Agreement originally made and entered into as of April 1, 1991, as further amended to date, has full legal right, power and authority under the Constitution and laws of the State to enter into this Agreement, to sell the Assessment Installment Receivables and the Collections to the Company, and to carry out and consummate all transactions contemplated hereby.

(b) *Due Execution.* By all necessary official action of the governing board of WRCOG, WRCOG has duly authorized and approved the execution and delivery of, and the performance by it of the obligations contained in this Agreement, and, as of the date hereof, such authorizations and approvals are in full force and effect and have not been amended, modified or rescinded.

(c) *Valid, Binding and Enforceable Obligations.* This Agreement constitutes the legal, valid and binding obligation of WRCOG, enforceable in accordance with its terms, except as enforcement may be limited by bankruptcy, insolvency, reorganization, moratorium or similar laws or equitable principles relating to or affecting creditors' rights, generally.

(d) *Consents and Approvals.* No consent or approval of any trustee or holder of any indebtedness of WRCOG or of the voters of WRCOG's member jurisdictions, and no consent, permission, authorization, order or license of, or filing or registration with, any governmental agency, is necessary in connection with the execution and delivery of this Agreement, or the consummation of any transaction herein or therein contemplated, except as have been obtained or made and as are in full force and effect.

(e) *No Conflicts.* The authorization, execution and delivery of this Agreement and compliance with the provisions of this Agreement do not and will not conflict with or constitute a breach of or default under any applicable constitutional provision, law or administrative rule or regulation of the State or the United States, or any applicable judgment, decree, license, permit, trust agreement, loan agreement, bond, note, resolution, ordinance, agreement or other instrument to which WRCOG (or any of its officers in their respective capacities as such) are subject, or by which it or any of its properties are bound; nor will any such authorization, execution, delivery or compliance result in the creation or imposition of any lien, charge or other security interest or encumbrance of any nature whatsoever upon any of its assets or properties or under the terms of any such law, regulation or instrument, except as may be provided by this Agreement.

(f) *No Litigation.* No action, suit, proceeding, inquiry or investigation, at law or in equity, before or by any court, government agency, public board or body, is

pending with service of process accomplished or, to the knowledge of WRCOG, pending or threatened, that:

(i) in any way questions the legal existence of WRCOG or the titles of the officers of WRCOG to their respective offices that would have any material likelihood of affecting the obligations of WRCOG under this Agreement;

(ii) contests the validity or the power and authority of WRCOG to sell or pledge the Assessment Installment Receivables to Company;

(iii) affects, contests or seeks to prohibit, restrain or enjoin the execution and delivery of this Agreement, the sale or pledge of the Assessment Installment Receivables by WRCOG to Company, or the payment of Collections on the Assessment Installment Receivables to the Company;

(iv) in any way contests or affects the validity of this Agreement, the power or authority of WRCOG to enter into this Agreement and perform its obligations hereunder or the consummation of the transactions contemplated hereby; or

(v) may result in any material adverse change relating to WRCOG's ability to comply with its obligations under this Agreement or to the Assessment Installment Receivables.

Section 4.02 Additional Representations and Agreements. WRCOG makes the following additional representations and agreements as of the Closing Date, on which the Company is deemed to have relied in acquiring the Assessment Installment Receivables:

(a) WRCOG has transferred the Assessment Installment Receivables to the Company pursuant to this Agreement for the Purchase Price, together with the Premium thereon, specified in this Agreement in cash. The consideration paid to WRCOG represents the fair market value of the Assessment Installment Receivables. This consideration was agreed upon as the result of arm's length negotiations. WRCOG has determined that the transactions contemplated by this Agreement and the related documents provide the maximum available financial benefits to WRCOG consistent with other objectives and requirements of WRCOG.

(b) WRCOG properly treats the transfer of the Assessment Installment Receivables to the Company as a sale pursuant to generally accepted accounting principles.

(c) There are no other agreements between WRCOG and the Company relating to or affecting the Assessment Installment Receivables, other than this Agreement.

(d) WRCOG does not receive any payments with respect to the Assessment Installment Receivables, except pursuant to this Agreement.

(e) WRCOG will mark its appropriate records so that they indicate the Assessment Installment Receivables have been sold and that the Company is the owner of such Assessment Installment Receivables. Such records of WRCOG may be in the form of a computer tape, microfiche, or other electronic or computer media.

(f) Sales of assets to the Company by WRCOG, including but not limited to the Assessment Installment Receivables, at all times have constituted and will constitute absolute transfers and conveyances, for fair and reasonably equivalent consideration, of all of the seller's right, title and interest in, to and under those assets for all purposes.

(g) WRCOG at no time has taken or will take any action that is inconsistent with any of the foregoing assumptions and that has given or will give (i) any creditor or future creditor of the Company cause to believe mistakenly that any obligation incurred by WRCOG has been or will be not only the obligation of WRCOG, but also of the Company, or (ii) any creditor or future creditor of either WRCOG or the Company cause to believe mistakenly that WRCOG and the Company have not been or will not continue to remain separate and distinct entities.

Section 4.03 Representations of Company. Company makes the following representations as of the Closing Date on which the WRCOG is deemed to have relied in selling the Assessment Installment Receivables to Company.

(a) *Due Organization, Existence and Company.* Company is a limited liability company, duly organized and validly existing under the laws of the State of Illinois, has full legal right, power and authority under the Constitution and laws of the State to enter into this Agreement, to purchase the Assessment Installment Receivables and the Collections from WRCOG, and to carry out and consummate all transactions contemplated hereby.

(b) *Due Execution.* By all necessary official action of Company, Company has duly authorized and approved the execution and delivery of, and the performance by it of the obligations contained in this Agreement, and, as of the date hereof, such authorizations and approvals are in full force and effect and have not been amended, modified or rescinded.

(c) *Valid, Binding and Enforceable Obligations.* This Agreement constitutes the legal, valid and binding obligation of Company, enforceable in accordance with its terms, except as enforcement may be limited by bankruptcy, insolvency, reorganization, moratorium or similar laws or equitable principles relating to or affecting creditors' rights, generally.

(d) *No Conflicts.* The authorization, execution and delivery of this Agreement and compliance with the provisions of this Agreement do not and will not conflict with or constitute a breach of or default under any applicable constitutional

provision, law or administrative rule or regulation of the State or the United States, or any applicable judgment, decree, license, permit, trust agreement, loan agreement, bond, note, resolution, ordinance, agreement or other instrument to which Company (or any of its officers in their respective capacities as such) are subject, or by which it or any of its properties are bound; nor will any such authorization, execution, delivery or compliance result in the creation or imposition of any lien, charge or other security interest or encumbrance of any nature whatsoever upon any of its assets or properties or under the terms of any such law, regulation or instrument, except as may be provided by this Agreement.

(e) *Consents and Approvals.* No consent or approval of any trustee or holder of any indebtedness of Company and no consent, permission, authorization, order or license of, or filing or registration with, any governmental agency, is necessary in connection with the execution and delivery of this Agreement, or the consummation of any transaction herein or therein contemplated, except as have been obtained or made and as are in full force and effect.

(f) *No Litigation.* No action, suit, proceeding, inquiry or investigation, at law or in equity, before or by any court, government agency, public board or body, is pending with service of process accomplished or, to the knowledge of Company, pending or threatened, that:

(i) in any way questions the legal existence of Company or the titles of the officers of Company to their respective offices that would have any material likelihood of affecting the obligations of Company under this Agreement;

(ii) contests the validity or the power and authority of Company to purchase the Assessment Installment Receivables from WRCOG;

(iii) affects, contests or seeks to prohibit, restrain or enjoin the execution and delivery of this Agreement, the purchase of the Assessment Installment Receivables by Company from WRCOG, or the payment of Collections on the Assessment Installment Receivables to the Company;

(iv) in any way contests or affects the validity of this Agreement or the consummation of the transactions contemplated hereby; or

(v) may result in any material adverse change relating to Company's ability to comply with its obligations under this Agreement.

Article V Miscellaneous

Section 5.01 Amendment. This Agreement may be amended by an instrument in writing signed by WRCOG and the Company.

Section 5.02 Entire Agreement. This Agreement shall constitute the entire agreement between the parties hereto and is made solely for the benefit of the parties hereto. No other person shall acquire or have any right hereunder by virtue hereof, except as provided herein.

Section 5.03 Notices. All notices or communications to be given under this Agreement shall be given by first class mail or personal delivery to the party entitled thereto at its address set forth below, or at such address as the party may provide to the other party in writing from time to time. Notice shall be effective either (a) upon actual receipt after deposit in the United States mail, postage prepaid, or (b) in the case of personal delivery to any person, upon actual receipt. The Company or WRCOG may, by written notice to the other parties, from time to time modify the address or number to which communications are to be given hereunder.

If to the Company: FNA California, LLC
 c/o First National Assets
 120 N. LaSalle, Suite 1220
 Chicago, IL 60602
 Attn: General Counsel

If to WRCOG: Western Riverside Council of Governments
 3390 University Ave. Suite 200
 Riverside, California 92501
 Attn: Executive Director

Section 5.04 No Assignment by WRCOG. Notwithstanding anything to the contrary contained herein, this Agreement may not be assigned by WRCOG.

Section 5.05 Limitations on Rights of Others. The provisions of this Agreement are solely for the benefit of WRCOG and the Company, and nothing in this Agreement, whether express or implied, shall be construed to give to any other Person any legal or equitable right, remedy or claim under or in respect of this Agreement or any covenants, conditions or provisions contained herein.

Section 5.06 Severability. Any provision of this Agreement that is prohibited or unenforceable in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof, and any such prohibition or unenforceability in any jurisdiction shall not invalidate or render unenforceable such provision in any other jurisdiction.

Section 5.07 Separate Counterparts. This Agreement may be executed by the parties hereto in separate counterparts, each of which when so executed and delivered shall be an original, but all such counterparts shall together constitute but one and the same instrument.

Section 5.08 Headings. The headings of the various Articles and Sections herein are for convenience of reference only and shall not define or limit any of the terms or provisions hereof.

Section 5.09 Governing Law and Venue.

(a) This Agreement shall be construed in accordance with the laws of the State, without reference to its conflict of law provisions, and the obligations, rights and remedies of the parties hereunder shall be determined in accordance with such laws.

(b) To the extent permitted by law, the parties hereto agree that any and all claims asserted against the Company arising under this Agreement or related thereto shall be heard and determined either in the courts of the United States located in Riverside, California or in the California State Courts located in Riverside, California.

(c) If WRCOG commences any action against the Company in a court located other than in Riverside, California, upon request of the Company, WRCOG shall either consent to a transfer of the action to a court of competent jurisdiction located in Riverside, California or, if the court where the action is initially brought will not or cannot transfer the action, WRCOG shall consent to dismiss such action without prejudice and may thereafter reinstitute the action in a court of competent jurisdiction in Riverside, California.

(d) To the extent permitted by law, the parties hereto agree that any and all claims asserted against WRCOG arising under this Agreement or related thereto shall be heard and determined either in the courts of the United States located in Riverside County, California or in the California State Courts located in Riverside County, California.

(e) If the Company commences any action against WRCOG in a court located other than in Riverside County, California, upon request of WRCOG, the Company shall either consent to a transfer of the action to a court of competent jurisdiction located in Riverside County, California or, if the court where the action is initially brought will not or cannot transfer the action, the Company shall consent to dismiss such action without prejudice and may thereafter reinstitute the action in a court of competent jurisdiction in Riverside County, California.

(f) With respect to any action between WRCOG and the Company in California State Court brought in accordance with the provisions of this Section, WRCOG and the Company each hereby expressly waives and relinquishes any rights either might otherwise have (i) to move to dismiss on grounds of forum non conveniens; (ii) to remove to Federal Court; and (iii) to move for a change of venue to a California State Court outside the county in which it is pending.

(g) With respect to any action between WRCOG and the Company in Federal Court brought in accordance with the provisions of this Section, WRCOG and the Company each hereby expressly waives and relinquishes any right either might otherwise have to move to transfer the action to another United States Court.

Section 5.10 Nonpetition Covenants. Notwithstanding any prior termination of this Agreement, WRCOG shall not, prior to the date which is one (1) year and one (1) day after the termination of this Agreement with respect to the Company, acquiesce, petition or otherwise invoke or cause the Company to invoke the process of any court or government against the Company for the purpose of commencing or sustaining a case against the Company under any Federal or state bankruptcy, insolvency or similar law or appointing a receiver, liquidator, assignee, trustee, custodian, sequestrator or other similar official of the Company or any substantial part of its property, or ordering the winding up or liquidation of the affairs of the Company.

Section 5.11 Successor Is Deemed Included In All References To Predecessor. Whenever in this Agreement either WRCOG or the Company is named or referred to, such reference shall be deemed to include the successors thereof, and all the covenants and agreements in this Agreement by or for the benefit of WRCOG and Company shall bind and inure to the benefit of the respective successors thereof whether so expressed or not.

Section 5.12 Waiver of Personal Liability. No member, officer, agent or employee of the Company or WRCOG shall be individually or personally liable for the payment of any amount due hereunder or be subject to any personal liability or accountability by reason of the transactions described herein; but nothing herein contained shall relieve any such member, officer, agent or employee from the performance of any official duty provided by law or by this Agreement.

Section 5.13 Exclusive Right of First Refusal. WRCOG hereby grants to the Company an exclusive right of first refusal to purchase, upon similar and mutually agreeable terms in this Agreement, *mutatis mutandis*, Assessment Installment Receivables that become delinquent with respect to the Tax Years ending on June 30, 2024, June 30, 2025 and June 30, 2026, as follows:

(a) With respect to Assessment Installment Receivables secured by Properties that also secure Assessment Installment Receivables that were previously purchased by the Company, such purchases shall be documented by the execution of an agreement in the form of this Agreement, *mutatis mutandis*, with the purchase price and premium calculated in the same manner as this Agreement; and

(b) With respect to all other Assessment Installment Receivables, such purchases shall be documented by the execution of an agreement in the form of this Agreement, *mutatis mutandis*, with the purchase price and premium calculated in the same manner as this Agreement, modified as the parties mutually agree.

[Next page is signature page]

IN WITNESS WHEREOF, the parties have executed this Agreement as of the date and year first above written.

WESTERN RIVERSIDE COUNCIL OF
GOVERNMENTS

By _____
Name: Dr. Kurt Wilson
Title: Executive Director

Approved as to Form

By: _____
Bond Counsel

FNA CALIFORNIA, LLC

By _____
Name: John Eisinger
Title: CEO

EXHIBIT "A"
ASSESSMENT INSTALLMENT RECEIVABLES SCHEDULE

EXHIBIT "B"
LIST OF MASTER INDENTURES

- (a) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of September 1, 2013, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (Energy Efficiency and Water Conservation Program for Western Riverside County) (First Residential Property Tranche – Phase Three), as amended by the First Amendment to the Master Indenture dated as of February 1, 2014.
- (b) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of February 1, 2014, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (First Residential Property Tranche – Phase One)
- (c) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of August 1, 2014, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Second Residential Property Tranche – Phase One)
- (d) Amended and Restated Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of March 1, 2015, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Second Residential Property Tranche – Phase One)
- (e) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of March 1, 2015 relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Third Residential Property Tranche – Phase One)
- (f) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of July 1, 2015, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Fourth Residential Property Tranche – Phase One);
- (g) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of October 1, 2015, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Fifth Residential Property Tranche – Phase One)

- (h) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of January 1, 2016, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Sixth Residential Property Tranche – Phase One)
- (i) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of May 1, 2016, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Seventh Residential Property Tranche – Phase One)
- (j) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of June 1, 2016, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Lifestyle Residential Property Tranche – Phase One)
- (k) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of September 1, 2016, relating to the Western Riverside Council of Governments Limited Subordinate Obligation Improvement Bonds (WRCOG HERO Program) (First Residential Property Tranche – Phase One)
- (l) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of September 1, 2016, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Eighth Residential Property Tranche – Phase One)
- (m) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of January 1, 2017, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG Program and California HERO Program) (Ninth Residential Property Tranche – Phase One)
- (n) Amended and Restated Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of March 1, 2017, relating to the Western Riverside Council of Governments Limited Subordinate Obligation Improvement Bonds (WRCOG HERO Program) (First Residential Property Tranche – Phase One)
- (o) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of May 1, 2017, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG HERO Program) (Tenth Residential Property Tranche – Phase One)

- (p) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of August 1, 2017, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG HERO Program) (Eleventh Residential Property Tranche – Phase One)
- (q) Master Indenture by and between WRCOG and Deutsche Bank National Trust Company, as Trustee, dated as of January 1, 2018, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG HERO Program) (Twelfth Residential Property Tranche – Phase One)
- (r) Master Indenture by and between WRCOG and The Bank of New York Mellon Trust Company, N.A., as Trustee, dated as of July 1, 2018, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG HERO Program) (Thirteenth Residential Property Tranche – Phase One)
- (s) Master Indenture by and between WRCOG and The Bank of New York Mellon Trust Company, N.A., as Trustee, dated as of September 1, 2019, relating to the Western Riverside Council of Governments Limited Obligation Improvement Bonds (WRCOG HERO Program) (Fourteenth Residential Property Tranche – Phase One)
- (t) Indenture of Trust by and between WRCOG and The Bank of New York Mellon Trust Company, N.A., as Trustee, dated as of February 1, 2020, relating to the Western Riverside Council of Governments Limited Obligation Refunding Bonds, Series 2020 (Commercial Program)

EXHIBIT "C"
EXCLUSION CRITERIA

1. On the Closing Date, an Assessment Installment Receivable that is not lawfully collectable or no longer constitutes a valid and existing lien on the subject Property.

2. On the Closing Date, an Assessment Installment Receivable where the subject Property (i) has been or is expected to be designated as a CERCLA or government designated environmental cleanup site or (ii) is subject to environmental contamination that could materially decrease the market value thereof.

3. On the Closing Date, a subject Property that is described as, owned by, or used for (a) vacant land, (b) a church or religious organization, (c) orphanages or other non-profit or charitable services, (d) sanitariums, convalescent and rest homes, (e) military properties, (f) forests parks or recreational areas, (g) public schools, (h) public colleges (i) public hospitals, (j) county properties, (k) state properties, (l) federal properties, (m) municipal properties, (n) utility properties (e.g., gas, electric, telephone, water, sewage, railroads, pipelines, canals, radio/tv/mobile communications towers), (o) subsurface rights, (p) right-of-way, streets, roads, irrigation channels and ditches, (q) rivers, lakes or other submerged lands, (r) sewage, disposal, solid waste disposal, borrow pits, drainage reservoirs, waste lands, marshes, sand dunes, or swamps or (s) heavy manufacturing or mineral processing.

4. At the time of origination, a subject Property, including improvements thereon, has an assessed value or market value of less than \$75,000.

5. On the Closing Date, an Assessment Installment Receivable where the original date of delinquency is greater than three hundred sixty-five (365) days prior to the Cut-off Date.

6. An Assessment Installment Receivable that was not originated by a WRCOG or any of its authorized program administrators.

7. On the Closing Date, an Assessment Installment Receivable that has been (a) challenged as to amount, enforceability or validity, (b) the subject of litigation, (c) subject to right of rescission, right of setoff or counterclaim, or (d) subjected to the assertion of defenses with respect to any of the foregoing.

8. At the time of origination, an Assessment Installment Receivable where (a) the loan to value ratio of the existing mortgage is greater than ninety percent (90%) or (b) the ratio of the aggregate amount of debt secured by any lien on the related Property to the market value of the Property is greater than ninety-five percent (95%).

9. On the Closing Date, an Assessment Installment Receivable that is subordinate to other valid claims on the subject Property or that otherwise does not have a first lien.

Attachment

WRCOG PACE Delinquency
Detail FY 2021-2022 Purchase
Exhibit

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Earl Johnson	6319 Buena Ventura Ave Oakland CA 94605	037A-2781-028-00	CA001100925	160923-CA-RA-R-15C	\$1,474.14	\$0.00	X	X	\$1,474.14	\$147.41	\$44.22	\$1,665.77	\$67,951.00	Alameda
Dolores Edmond	6206 Mayhews Landing Rd Newark CA 94560	092A-0911-020-00	CA001101464	170616-CA-RA2-HPRCA4-R-25C	\$2,118.32	\$1,059.16		X	\$1,059.16	\$105.92	\$31.77	\$1,196.85	\$48,245.00	Alameda
Edward Sterling, Andrea Sterling	3423 Saddle Dr Hayward CA 94541	425 -0090-011-00	CA001101397	170721-CA-RA3-HPR-R-15C	\$2,864.60	\$0.00	X	X	\$2,864.60	\$286.46	\$85.94	\$3,237.00	\$589,743.00	Alameda
Nancy Barnum-Moreland	2500 Lancaster Ct Hayward CA 94542	425 -0360-017-00	CA001101863	171103-CA-RA-HPR-R-05C	\$12,909.09	\$0.00	X	X	\$12,909.09	\$1,290.91	\$387.27	\$14,587.27	\$99,812.00	Alameda
Joseph De La Rosa, Synthia De La Rosa	908 G St Union City CA 94587	486 -0027-095-00	CA001102001	180112-CA-RA-HPR-R-10C	\$3,987.10	\$1,993.55		X	\$1,993.55	\$199.36	\$59.81	\$2,252.72	\$144,491.00	Alameda
Nancy Barnum-Moreland	2500 Lancaster Ct Hayward CA 94542	425 -0360-017-00	CA001102209	180112-CA-RA-HPR-R-20C	\$1,953.21	\$0.00	X	X	\$1,953.21	\$195.32	\$58.60	\$2,207.13	\$99,812.00	Alameda
Leonard Baxter, Gail Baxter	324 Goldenrain Ave Fremont CA 94539	519 -1199-087-00	CA001102099	180126-CA-RA3-HPR-R-25CD	\$4,466.44	\$0.00	X	X	\$4,466.44	\$446.64	\$133.99	\$5,047.07	\$109,709.00	Alameda
Gene Maxwell	2915 Ralston Way Hayward CA 94541	417 -0050-095-03	CA001102373	180511-CA-RA3-HPR-R-05CDE	\$5,462.06	\$0.00	X	X	\$5,462.06	\$546.21	\$163.86	\$6,172.13	\$472,462.00	Alameda
CLYDIA CALDWELL	26 FOSTER CT Oakland CA 94603	045 -5309-015-00	CA001102623	190118-CA-RA-HPR-R-25EF	\$3,814.18	\$0.00	X	X	\$3,814.18	\$381.42	\$114.43	\$107,720.00	\$107,720.00	Alameda
Nira Allen	34829 GLADSTONE PL FREMONT CA 94555	543 -0328-038-00	CA001102901	200327-CA-RA-HPR-R-20F	\$4,660.04	\$0.00	X	X	\$4,660.04	\$466.00	\$139.80	\$5,265.84	\$140,871.00	Alameda
Jolie Chain	125 Amelia St Sutter Creek CA 95685	018-063-012-000	CA005109447	171020-CA-RA-HPR-R-15C	\$1,493.06	\$0.00	X	X	\$1,493.06	\$149.31	\$44.79	\$1,687.16	\$182,017.00	Amador
Robert Jackson, Tamara Jackson	16091 Overlook Ter Pioneer CA 95666	023-140-011-000	CA005109474	180216-CA-RA-HPR-R-10CD	\$2,519.70	\$0.00	X	X	\$2,519.70	\$251.97	\$75.59	\$2,847.26	\$201,283.00	Amador
Cheryl Watkins	815 Black Walnut Way Chico CA 95973	042-720-036-000	CA007109931	161202-CA-RA-R-25C	\$3,191.62	\$1,595.81		X	\$1,595.81	\$159.58	\$47.87	\$1,803.26	\$230,962.00	Butte
Joe Pearce	3647 Ashley Ave Oroville CA 95966	033-452-014-000	CA007109987	170428-CA-RA3-HPR-R-15C	\$1,377.16	\$688.58		X	\$688.58	\$68.86	\$20.66	\$778.10	\$142,024.00	Butte
Travis Richardson, Jesse Richardson	13602 Andover Dr Magalia CA 95954	066-140-021-000	CA007110231	180323-CA-RA-HPR-R-25CDE	\$2,099.88	\$0.00	X	X	\$2,099.88	\$209.99	\$63.00	\$2,372.87	\$15,000.00	Butte
Damon Munn	1191 Mount Ida Rd Oroville CA 95966	079-330-011-000	CA007110366	190719-CA-RA-HPR-R-20F	\$1,114.16	\$557.08		X	\$557.08	\$55.71	\$16.71	\$629.50	\$186,858.00	Butte
Charles Clements	3180 Sand Ridge Rd Placerville CA 95667	046-361-030-000	RED95891N-160127	160512-BE-CA-RA-R-03-15C	\$4,117.84	\$0.00	X	X	\$4,117.84	\$411.78	\$123.54	\$4,653.16	\$195,502.00	El Dorado
William Landrum, Kristi Tyler, Annalissa Landrum	1131 El Campo Rd Lotus CA 95651	105-090-004-000	CA017104904	171020-CA-RA-HPR-R-10C	\$12,406.06	\$6,203.03		X	\$6,203.03	\$620.30	\$186.09	\$7,009.42	\$151,325.00	El Dorado
Donacia Wright, Eola Melancon, Genelle Greene	28 E Stanislaus St Fresno CA 93706	465-214-03	RFC95120N-140522	150406-BE-R-02-10	\$1,272.54	\$636.27		X	\$636.27	\$63.63	\$19.09	\$718.99	\$86,186.00	Fresno
Michael Ward	321 W Lorena Fresno CA 93706	477-131-15	RFC94244C-140703	150406-BE-R-02-10	\$1,112.84	\$0.00	X	X	\$1,112.84	\$111.28	\$33.39	\$1,257.51	\$27,896.00	Fresno
James Ortega	1827 S Sierra Vista Ave Fresno CA 93702	471-244-07	RFC92213N-141112	150406-BE-R-04-20	\$1,630.38	\$0.00	X	X	\$1,630.38	\$163.04	\$48.91	\$1,842.33	\$49,243.00	Fresno
Brian Jensen, Jennifer Jensen	6460 N Arthur Ave Fresno CA 93711	407-821-27	RFC90092N-150327	150713-BE-WR-R-07-20C	\$120.64	\$60.32		X	\$60.32	\$6.03	\$1.81	\$68.16	\$261,672.00	Fresno
Karen Connelly	5127 N Teilman Ave Fresno CA 93711	417-180-24	RFC87062N-150701	151022-BE-WR-R-03-10C	\$2,318.26	\$0.00	X	X	\$2,318.26	\$231.83	\$69.55	\$2,619.64	\$252,207.00	Fresno
Laurie Melton	1489 W Olson Ave Reedley CA 93654	365-203-04	RFC90221N-150325	151022-BE-WR-R-07-20C	\$2,190.08	\$0.00	X	X	\$2,190.08	\$219.01	\$65.70	\$2,474.79	\$160,496.00	Fresno
Ronald Loman, Suzanne Loman	4690 W Ashlan Ave Fresno CA 93722	510-394-305	RFC83201N-151017	160114-BE-WR-R-04-20C	\$1,739.34	\$869.67		X	\$869.67	\$86.97	\$26.09	\$982.73	\$97,466.00	Fresno
Jerardo Gonzalez, Wendy Gonzalez	224 Harrison St Coalinga CA 93210	071-144-025	RFC81419N-151220	160512-BE-CA-RA-R-04-20C	\$1,509.01	\$0.00	X	X	\$1,509.01	\$150.90	\$45.27	\$1,705.18	\$174,981.00	Fresno
Mary Mehia	276 W Locust Ave Pinedale CA 93650	303-121-23	RFC83822N-150926	160512-BE-CA-RA-R-04-20C	\$1,254.78	\$0.00	X	X	\$1,254.78	\$125.48	\$37.64	\$1,417.90	\$63,771.00	Fresno
Agnes Di Girolamo	1107 Menlo Ave Fresno CA 93710	408-183-08	RFC79946N-160217	160512-BE-CA-RA-R-04-20C	\$3,718.32	\$1,859.16		X	\$1,859.16	\$185.92	\$55.77	\$2,100.85	\$144,867.00	Fresno
John Ferretti, Kadden Ferretti	1675 Barstow Ave Clovis CA 93611	498-254-25	RFC79421E-160304	160520-CA-RA-R-15C	\$2,655.24	\$1,327.62		X	\$1,327.62	\$132.76	\$39.83	\$1,500.21	\$179,264.00	Fresno
Bee Vue, Cheenew Vang, Ka Vang	5832 Washington Ave Fresno CA 93727	313-463-02	RFC78977N-160314	160527-CA-RA-R-15C	\$1,381.18	\$0.00	X	X	\$1,381.18	\$138.12	\$41.44	\$1,560.74	\$167,724.00	Fresno
Deana Holley	30448 E Trimmer Springs Rd Sanger CA 93657	153-270-01	CA019109398	160603-CA-RA2-R-20C	\$2,133.74	\$0.00	X	X	\$2,133.74	\$213.37	\$64.01	\$2,411.12	\$138,785.00	Fresno
Harry Silva	1934 W Pontiac Way Fresno CA 93705	433-151-34	CA019110073	160708-CA-RA-R-15C	\$1,757.56	\$0.00	X	X	\$1,757.56	\$175.76	\$52.73	\$1,986.05	\$125,655.00	Fresno
Michael Guillen, Rebecca Guillen	1120 Cyrier Ave Reedley CA 93654	365-113-20	CA019110141	160805-CA-RA2-R-05C	\$2,480.22	\$1,240.11		X	\$1,240.11	\$124.01	\$37.20	\$1,401.32	\$149,630.00	Fresno
Deana Holley	30448 E Trimmer Springs Rd Sanger CA 93657	153-270-01	CA019110413	160819-CA-RA-R-10C	\$1,269.58	\$0.00	X	X	\$1,269.58	\$126.96	\$38.09	\$1,434.63	\$138,785.00	Fresno
Gloria Esparza	4388 N Cedar Ave Fresno CA 93726	430-181-01	CA019110836	160819-CA-RA-R-10C	\$2,468.38	\$1,234.19		X	\$1,234.19	\$123.42	\$37.03	\$1,394.64	\$54,794.00	Fresno
John Heathcote, Tracy Heathcote	335 E Aspen Dr Reedley CA 93654	363-413-04	CA019110631	160902-CA-RA-R-15C	\$2,541.54	\$1,270.77		X	\$1,270.77	\$127.08	\$38.12	\$1,435.97	\$210,342.00	Fresno
Billy Stimson	3120 N 9th St Fresno CA 93703	445-092-15	CA019110721	160902-CA-RA-R-15C	\$1,954.60	\$0.00	X	X	\$1,954.60	\$195.46	\$58.64	\$2,208.70	\$107,118.00	Fresno
Jerardo Gonzalez, Wendy Gonzalez	224 Harrison St Coalinga CA 93210	071-144-025	CA019110478	160909-CA-RA-R-20C	\$1,037.09	\$0.00	X	X	\$1,037.09	\$103.71	\$31.11	\$1,171.91	\$174,981.00	Fresno
Gerald Curnyn	5098 E Ashlan AVE Fresno CA 93727	493-030-235	CA019110734	160909-CA-RA-R-20C	\$724.60	\$362.30		X	\$362.30	\$36.23	\$10.87	\$409.40	\$65,418.00	Fresno
Beverly Henry	2835 Gettysburg Ave Fresno CA 93726	427-194-11	CA019111106	160930-CA-RA-R-15C	\$1,819.86	\$0.00	X	X	\$1,819.86	\$181.99	\$54.60	\$2,056.45	\$64,613.00	Fresno
Jacinto Dela Cruz, Mary Dela Cruz	7150 N Everest Ave Fresno CA 93722	504-123-055	CA019109688	161007-CA-RA2-R-20C	\$1,901.66	\$0.00	X	X	\$1,901.66	\$190.17	\$57.05	\$2,148.88	\$88,501.00	Fresno
Celedonio Arceo, Maria Arceo	375 W Palm Ave Reedley CA 93654	363-152-10	CA019111368	161114-CA-RA-R-10C	\$1,736.96	\$868.48		X	\$868.48	\$86.85	\$26.05	\$981.38	\$166,442.00	Fresno
Jessie Martin, Rosie Martin	2526 Poppy Ave Fresno CA 93706	479-171-08	CA019110658	161216-CA-RA-R-20C	\$1,604.14	\$0.00	X	X	\$1,604.14	\$160.41	\$48.12	\$1,812.67	\$57,431.00	Fresno
Carol Cederquist, Kenneth Cederquist	2307 Menlo Ave Clovis CA 93611	550-073-23	CA019112896	170113-CA-RA2-R-15C	\$2,797.08	\$0.00	X	X	\$2,797.08	\$279.71	\$83.91	\$3,160.70	\$230,331.00	Fresno
Mary Olgin, Robert Olgin	17389 Park Cliffe LN Friant CA 93626	300-400-10	CA019112600	170113-CA-RA2-R-25C	\$2,127.60	\$1,063.80		X	\$1,063.80	\$106.38	\$31.91	\$1,202.09	\$152,000.00	Fresno
Francisco Morales, Gloria Morales	985 Anchor Ave Orange Cove CA 93646	378-253-02	CA019113238	170120-CA-RA-R-10C	\$1,450.36	\$725.18		X	\$725.18	\$72.52	\$21.76	\$819.46	\$127,164.00	Fresno
Ger Yang, Seethong Yang	358 E Kaviland Ave Fresno CA 93706	479-191-17	CA019113252	170217-CA-RA-R-15C	\$3,105.68	\$1,552.84		X	\$1,552.84	\$155.28	\$46.59	\$1,754.71	\$180,000.00	Fresno
Sherry Larsen	2511 E Birch Ave Clovis CA 93611	404-090-12	CA019112953	170224-CA-RA-R-15C	\$1,914.88	\$957.44		X	\$957.44	\$95.74	\$28.72	\$1,081.90	\$630,656.00	Fresno
Gonzalo Rodriguez, Magdalena Gadea	970 2nd Ct Sanger CA 93657	320-281-26	CA019113358	170303-CA-RA2-R-10C	\$1,546.18	\$0.00	X	X	\$1,546.18	\$154.62	\$46.39	\$1,747.19	\$163,054.00	Fresno
Becky Hinson, James Hinson	4520 W Terrace Ave Fresno CA 93722	312-501-14	CA019113488	170317-CA-RA3-R-15C	\$2,225.20	\$0.00	X	X	\$2,225.20	\$222.52	\$66.76	\$2,514.48	\$146,991.00	Fresno
Love Cordova	669 Harvard Ave Clovis CA 93612	497-063-18	CA019113701	170324-CA-RA3-R-15C	\$1,645.16	\$822.58		X	\$822.58	\$82.26	\$24.68	\$929.52	\$30,031.00	Fresno
Enedelia Valencia	29585 W Hidalgo AVE Cantua Creek CA 93608	038-343-085	CA019113628	170331-CA-RA3-R-15C	\$1,221.36	\$610.68		X	\$610.68	\$61.07	\$18.32	\$690.07	\$73,065.00	Fresno
George Huerta	20946 S Del Rio St Laton CA 93242	057-182-09	CA019113656	170421-CA-RA-HPR-R-15C	\$820.68	\$410.34		X	\$410.34	\$41.03	\$12.31	\$463.68	\$52,741.00	Fresno
Luis Torres, Maria Torres	709 E Washington Ave Reedley CA 93654	370-203-01	CA019112989	170519-CA-RA3-HPR-R-15C	\$2,128.12	\$0.00	X	X	\$2,128.12	\$212.81	\$63.84	\$2,404.77	\$64,616.00	Fresno
Rosaura Garcia	13510 9th St Parlier CA 93648	355-381-05	CA019113289	170519-CA-RA3-HPR-R-20C	\$2,567.82	\$1,283.91		X	\$1,283.91	\$128.39	\$38.52	\$1,450.82	\$178,700.00	Fresno
David Hallier	4279 W Providence Ave Fresno CA 93722	312-542-04	CA019113736	170519-CA-RA3-HPR-R-25C	\$1,572.16	\$0.00	X	X	\$1,572.16	\$157.22	\$47.16	\$1,776.54	\$157,010.00	Fresno
Jose Zepeda, Ana Zepeda	3241 E Lowe Ave Fresno CA 93702	470-106-12	CA019115248	170629-CA-RA3-HPRCA4-R-15C	\$1,052.50	\$0.00	X	X	\$1,052.50	\$105.25	\$31.58	\$1,189.33	\$76,206.00	Fresno
Robert Ervin	510 E Oleander Ave Fresno CA 93706	465-253-01	CA019113403	170629-CA-RA3-HPR-R-25C	\$2,261.90	\$1,130.95		X	\$1,130.95	\$113.10	\$33.93	\$1,377.98	\$49,844.00	Fresno
Jared Turney, Julie Turney	2425 Thompson Ave Selma CA 93662	388-064-08	CA019115341	1										

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Nadine Puckett	211 Adams St Taft CA 93268	199-156-06-00-3	RKC90059N-150318	150713-BE-WR-R-03-10C	\$1,975.60	\$0.00	X	X	\$1,975.60	\$197.56	\$59.27	\$2,232.43	\$79,478.00	Kern
Leona Compton	1706 9th St Delano CA 93215	424-060-02-00-4	RKC91301C-150216	150713-BE-WR-R-04-10B	\$1,547.32	\$773.66		X	\$773.66	\$77.37	\$23.21	\$874.24	\$42,633.00	Kern
Edward Guemes	3644 Alene Ave Ridgecrest CA 93555	352-221-16-00-4	RKC89783N-150325	150713-BE-WR-R-05-15C	\$2,418.04	\$0.00	X	X	\$2,418.04	\$241.80	\$72.54	\$2,732.38	\$133,648.00	Kern
Jean Yackley, Pete Yackley	305 Pauma Ct Bakersfield CA 93309	020-570-03-00-1	RKC84809P-150727	151022-BE-WR-R-12-20C	\$2,819.86	\$1,409.93		X	\$1,409.93	\$140.99	\$42.30	\$1,593.22	\$209,183.00	Kern
Sandra Calderon	1718 Lincoln St Bakersfield CA 93305	128-170-15-00-5	RKC81683N-151013	160114-BE-WR-R-02-10C	\$1,568.88	\$0.00	X	X	\$1,568.88	\$156.89	\$47.07	\$1,772.84	\$40,461.00	Kern
Edmund Esparza, Irene Esparza	22710 Jerry Dr Tehachapi CA 93561	289-151-17-00-6	RKC82928A-150909	160114-BE-WR-R-08-20C	\$4,474.88	\$2,237.44		X	\$2,237.44	\$223.74	\$67.12	\$2,528.30	\$302,779.00	Kern
Helen Cullen	227 Oleander Ave Bakersfield CA 93304	008-192-10-00-5	RKC78455N-160220	160506-CA-RA-R-20C	\$2,259.44	\$0.00	X	X	\$2,259.44	\$225.94	\$67.78	\$2,553.16	\$182,611.00	Kern
Jackie Hagans	2613 Lupine St Lake Isabella CA 93240	263-234-01-00-5	CA029103512	160506-CA-RA-R-20C	\$870.18	\$0.00	X	X	\$870.18	\$87.02	\$26.11	\$983.31	\$67,112.00	Kern
Claudie Hawley, Marie Hawley	2508 Connie AVE Bakersfield CA 93304	372-080-04-00-8	RKC80159N-151201	160512-BE-CA-RA2-R-08-20C	\$2,168.96	\$0.00	X	X	\$2,168.96	\$216.90	\$65.07	\$2,450.93	\$88,691.00	Kern
Kimberly Harrison	2616 Earlene Ave Bakersfield CA 93304	372-051-04-00-6	RKC79112N-160121	160512-BE-CA-RA-R-03-15C	\$1,605.68	\$0.00	X	X	\$1,605.68	\$160.57	\$48.17	\$1,814.42	\$44,087.00	Kern
David Barnard, Patricia Barnard	6800 Shafter Rd Bakersfield CA 93313	184-382-13-01-3	RKC80330C-151121	160512-BE-CA-RA-R-04-20C	\$5,913.22	\$0.00	X	X	\$5,913.22	\$591.32	\$177.40	\$6,681.94	\$138,782.00	Kern
Geraldine Carter	821 Fox Tree Ct Bakersfield CA 93306	388-460-05-00-6	RKC82259N-150929	160512-BE-CA-RA-R-04-20C	\$2,150.92	\$1,075.46		X	\$1,075.46	\$107.55	\$32.26	\$1,215.27	\$120,410.00	Kern
Connie Williams	8824 Haupt Ave Bakersfield CA 93306	388-231-01-00-4	CA029104748	160812-CA-RA-R-05C	\$3,388.26	\$0.00	X	X	\$3,388.26	\$338.83	\$101.65	\$3,828.74	\$120,056.00	Kern
Karl Goesele	2800 Noble Ave Bakersfield CA 93306	383-132-22-00-8	CA029104831	160923-CA-RA-R-10C	\$1,541.54	\$770.77		X	\$770.77	\$77.08	\$23.12	\$870.97	\$124,953.00	Kern
Linda McHenry	524 Francis ST Bakersfield CA 93308	112-371-10-00-0	CA029105104	160930-CA-RA-R-20C	\$1,156.24	\$0.00	X	X	\$1,156.24	\$115.62	\$34.69	\$1,306.55	\$127,430.00	Kern
Esther Escalante, Lewis Escalante	2221 Manley Ct Bakersfield CA 93306	129-131-12-00-8	CA029104397	161014-CA-RA-R-20C	\$2,196.98	\$0.00	X	X	\$2,196.98	\$219.70	\$65.91	\$2,482.59	\$93,357.00	Kern
Anne Lloyd	15945 Rexroth St Mojave CA 93501	427-201-24-00-6	CA029104823	161028-CA-RA2-R-20C	\$1,102.64	\$0.00	X	X	\$1,102.64	\$110.26	\$33.08	\$1,245.98	\$41,010.00	Kern
Lonnie Comstock	1606 Rench Rd Bakersfield CA 93308	111-031-10-00-4	CA029105610	161028-CA-RA2-R-25C	\$1,649.08	\$0.00	X	X	\$1,649.08	\$164.91	\$49.47	\$1,863.46	\$70,305.00	Kern
Adelaide Cota, Jessica Marshall, Jose Cota	21108 79th St California City CA 93505	299-031-08-00-8	CA029105706	161118-CA-RA2-R-05C	\$1,224.64	\$612.32		X	\$612.32	\$61.23	\$18.37	\$691.92	\$37,274.00	Kern
Linda McHenry	524 Francis ST Bakersfield CA 93308	112-371-10-00-0	CA029106024	161223-CA-RA-R-20C	\$1,332.92	\$0.00	X	X	\$1,332.92	\$133.29	\$39.99	\$1,506.20	\$127,430.00	Kern
Austin Davidson	2235 Quincy St Delano CA 93215	034-080-28-00-3	CA029106244	170113-CA-RA2-R-15C	\$1,423.54	\$0.00	X	X	\$1,423.54	\$142.35	\$42.71	\$1,608.60	\$36,588.00	Kern
Ellen Bane	139 Spruce St Bakersfield CA 93304	008-212-03-00-0	CA029105864	170113-CA-RA2-R-20C	\$1,146.84	\$573.42		X	\$573.42	\$57.34	\$17.20	\$647.96	\$123,668.00	Kern
Marilyn Dukette	413 Cale CT Bakersfield CA 93308	118-193-01-00-8	CA029106360	170120-CA-RA-R-20C	\$2,643.72	\$0.00	X	X	\$2,643.72	\$264.37	\$79.31	\$2,987.40	\$134,180.00	Kern
Jack Weimer, Peggy Weimer	5305 Cameron CT Bakersfield CA 93309	355-071-02-00-1	CA029107712	170519-CA-RA3-HPR-R-15C	\$2,705.50	\$1,352.75		X	\$1,352.75	\$135.28	\$40.58	\$1,512.61	\$80,014.00	Kern
Lisa Walston	25414 Barbara St Arvin CA 93203	189-111-27-00-4	CA029108088	170811-CA-RA-HPRCA2-R-15C	\$1,675.06	\$837.53		X	\$837.53	\$83.75	\$25.13	\$946.41	\$26,803.00	Kern
Donna Van Dyk	2800 Everest WAY Pine Mountain Club CA 93222	256-461-01-00-9	CA029108433	170825-CA-RA-HPR-R-15C	\$3,723.34	\$1,861.67		X	\$1,861.67	\$186.17	\$55.85	\$2,103.69	\$203,717.00	Kern
Jose Arias	2917 Kentucky St Bakersfield CA 93306	137-170-04-00-9	CA029108759	171027-CA-RA-HPR-R-25C	\$2,370.98	\$1,185.49		X	\$1,185.49	\$118.55	\$35.56	\$1,339.60	\$76,578.00	Kern
Humberto Villarreal, Maria Villarreal	632 Langford Ave Arvin CA 93203	192-221-18-00-4	CA029108983	180209-CA-RA-HPR-R-15CD	\$2,060.36	\$0.00	X	X	\$2,060.36	\$206.04	\$61.81	\$2,328.21	\$67,811.00	Kern
Manuel Garcia, Graciela Garcia	1474 23RD AVE Delano CA 93215	034-062-01-00-2	CA029109282	190222-CA-RA-HPR-R-25EF	\$1,759.30	\$879.65		X	\$879.65	\$87.97	\$26.39	\$994.01	\$66,123.00	Kern
Angelita Martinez, Jesse Martinez	625 Hill St Lemoore CA 93245	020-012-008-000	CA031108968	160603-CA-RA2-R-15C	\$2,038.86	\$1,019.43		X	\$1,019.43	\$101.94	\$30.58	\$1,151.95	\$67,949.00	Kings
Pamela Oliveira	15900 18th Ave Lemoore CA 93245	024-110-034-000	CA031109040	160722-CA-RA-R-15C	\$1,455.70	\$727.85		X	\$727.85	\$72.79	\$21.84	\$822.48	\$96,278.00	Kings
Pamela Oliveira	15900 18th Ave Lemoore CA 93245	024-110-034-000	CA031109048	160902-CA-RA-R-20C	\$635.70	\$326.85		X	\$326.85	\$32.69	\$9.81	\$369.35	\$96,278.00	Kings
Manuel Lopez	2535 Plum Ln Hanford CA 93230	007-340-020-000	CA031109776	170915-CA-RA-HPR-R-15C	\$4,755.36	\$0.00	X	X	\$4,755.36	\$475.54	\$142.66	\$5,373.56	\$190,746.00	Kings
Patsy Vanhorn	1615 Hale AVE Corcoran CA 93212	032-171-016-000	CA031109985	180323-CA-RA-HPR-R-20CDE	\$1,669.92	\$0.00	X	X	\$1,669.92	\$166.99	\$50.10	\$1,887.01	\$41,909.00	Kings
Lynn Turner	1419 Fitzgerald Ln Hanford CA 93230	010-320-008-000	CA031109992	180608-CA-RA-HPR-R-25CDE	\$1,317.18	\$658.59		X	\$658.59	\$65.86	\$19.76	\$744.21	\$83,213.00	Kings
Stella Aceves	2120 N DOUTY ST HANFORD CA 93230	008-150-008-000	CA031110102	190111-CA-RA-HPR-R-15EF	\$1,235.92	\$0.00	X	X	\$1,235.92	\$123.59	\$37.08	\$1,396.59	\$322,712.00	Kings
Ramon Gloria	2556 SHERMAN AVE CORCORAN CA 93212	034-143-059-000	CA031110292	200424-CA-RA-HPR-R-20F	\$1,060.26	\$0.00	X	X	\$1,060.26	\$106.03	\$31.81	\$1,198.10	\$36,438.00	Kings
Ericka England	37922 Janus Dr Palmdale CA 93550	3020-032-014	RLA94700N-140606	140711-CA-PB-R-15B	\$3,381.14	\$1,690.57		X	\$1,690.57	\$169.06	\$50.72	\$1,910.35	\$162,628.00	Los Angeles
Jorge Jarrin, Margarita Jarrin	450 N Gerona Ave San Gabriel CA 91775	5366-020-011	RLA88289N-140918	150406-BE-R-02-10	\$4,343.70	\$0.00	X	X	\$4,343.70	\$434.37	\$130.31	\$4,908.38	\$488,788.00	Los Angeles
Jessica Tran	3408 Frazier St Baldwin Park CA 91706	8551-017-044	RLA84737C-141121	150406-BE-R-02-10	\$2,695.89	\$1,347.95		X	\$1,347.94	\$134.79	\$40.44	\$1,523.17	\$470,021.00	Los Angeles
Karen Chambers	16005 Halldale St Gardena CA 90247	6105-016-002	RLA90854C-140806	150406-BE-R-03-15	\$3,535.00	\$0.00	X	X	\$3,535.00	\$353.50	\$106.05	\$3,994.55	\$481,200.00	Los Angeles
Angel Torres, Gloria Torres	869 Lincoln Ave Pomona CA 91767	8319-007-011	RLA88070C-140922	150406-BE-R-04-20	\$1,862.18	\$931.09		X	\$931.09	\$93.11	\$27.93	\$1,052.13	\$66,776.00	Los Angeles
Celida Garibaldo, Francisco Garibaldo	14143 Ballentine Pl Baldwin Park CA 91706	8544-011-009	RLA95654C-140527	150406-BE-R-04-20	\$1,847.31	\$923.66		X	\$923.65	\$92.37	\$27.71	\$1,043.73	\$388,501.00	Los Angeles
Restituto Ebor	43905 Elm Ave Lancaster CA 93534	3130-013-024	RLA74567N-150521	150713-BE-WR-R-05-15C	\$2,496.80	\$1,248.40		X	\$1,248.40	\$124.84	\$37.45	\$1,410.69	\$219,285.00	Los Angeles
Andrew Glover	746 E Fernleaf Ave Pomona CA 91766	8333-027-019	RLA81422CB-150202	150713-BE-WR-R-05-15C	\$1,343.20	\$0.00	X	X	\$1,343.20	\$134.32	\$40.30	\$1,517.82	\$191,346.00	Los Angeles
Aaron Ewing	45534 Sancroft Ave Lancaster CA 93535	3176-013-008	RLA81263N-150205	150713-BE-WR-R-08-20B	\$1,956.73	\$978.37		X	\$978.36	\$97.84	\$29.35	\$1,105.55	\$99,413.00	Los Angeles
Andrew Glover	746 E Fernleaf Ave Pomona CA 91766	8333-027-019	RLA81422C-150202	150713-BE-WR-R-08-20B	\$2,164.52	\$0.00	X	X	\$2,164.52	\$216.45	\$64.94	\$2,445.91	\$191,346.00	Los Angeles
Nicole Davis-Johnson	1340 W Orange Grove Ave Pomona CA 91768	8357-002-100	RLA80942C-150210	150713-BE-WR-R-08-20B	\$4,056.75	\$0.00	X	X	\$4,056.75	\$405.68	\$121.70	\$4,584.13	\$220,471.00	Los Angeles
Jennifer Heger, Joel Heger	2024 Monterey Rd South Pasadena CA 91030	5318-008-041	RLA77885C-150331	151022-BE-WR-R-07-20C	\$2,054.44	\$1,027.22		X	\$1,027.22	\$102.72	\$30.82	\$1,160.76	\$1,077,048.00	Los Angeles
Josephine Cantlin	15370 Carfax Ave Bellflower CA 90706	6275-025-012	RLA77627N-150403	151022-BE-WR-R-07-20C	\$6,612.48	\$3,306.24		X	\$3,306.24	\$330.62	\$99.19	\$3,736.05	\$145,278.00	Los Angeles
Melinda Sawyer	1637 WATERS AVE POMONA CA 91766	8343-021-023	CA037166055	211007-CA-RPP-R-25	\$3,071.51	\$0.00	X	X	\$3,071.51	\$307.15	\$92.15	\$3,470.81	\$34,591.00	Los Angeles
Francisca Reyes	1627 Jaden Ct Madera CA 93638	005-280-014-000	CA039108212	171201-CA-RA-HPR-R-15C	\$2,167.12	\$0.00	X	X	\$2,167.12	\$216.71	\$65.01	\$2,448.84	\$194,064.00	Madera
Linda Garlic	45391 S OAKVIEW DR Oakhurst CA 93644	055-271-023-000	CA039108666	190426-CA-RA-HPR-R-10FE	\$787.36	\$0.00	X	X	\$787.36	\$78.74	\$23.62	\$889.72	\$203,850.00	Madera
Kulbir Bajwa	3844 Hatch Rd Merced CA 95340	060-670-002-000	RMR93389N-160301	160729-CA-RA-R-05C	\$16,434.06	\$0.00	X	X	\$16,434.06	\$1,643.41	\$493.02	\$18,570.49	\$495,419.00	Merced
Julio Rojas-Reyes	627 Q St Merced CA 95341	032-183-036-000	CA047109097	161021-CA-RA-R-10C	\$1,738.02	\$869.01		X	\$869.01	\$86.90	\$26.07	\$981.98	\$47,136.00	Merced
Pamela Bunthoff	1357 Lucerne AVE Dos Palos CA 93620	012-154-008-000	CA047109352	170602-CA-RA3-HPR-R-10C	\$1,806.92	\$903.46		X	\$903.46	\$90.35	\$27.10	\$1,020.91	\$113,116.00	Merced
Dorothy Reynolds, Walter Reynolds	704 Northwood Dr Merced CA 95348	007-272-019-000	CA047109498	170707-CA-RA3-HPR-R-20C	\$2,411.28	\$0.00	X	X	\$2,411.28	\$241.13	\$72.34	\$2,724.75	\$86,774.00	Merced
Mindy Stevens, Curtis Stevens	23658 W Fourth AVE Stevinson CA 95374	055-290-006-000	CA047109897	170818-CA-RA-HPR-R-10C	\$1,172.54	\$586.27								

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Jaime Devera	6153 Nauru St Cypress CA 90630	224-075-08	ROC74018N-150914	160114-BE-WR-R-04-20C	\$2,864.13	\$1,432.07		X	\$1,432.06	\$143.21	\$42.96	\$1,618.23	\$83,203.00	Orange
George Thornton	1716 W 10th St Santa Ana CA 92703	405-141-71	ROC76247N-150801	160114-BE-WR-R-04-20C	\$1,466.50	\$0.00	X	X	\$1,466.50	\$146.65	\$44.00	\$1,655.15	\$65,841.00	Orange
Peta Fasulo, Robert Fasulo	2285 Tustin Ave Newport Beach CA 92660	426-091-53	ROC71813N-151022	160114-BE-WR-R-07-15C	\$2,241.93	\$0.00	X	X	\$2,241.93	\$224.19	\$67.26	\$2,533.38	\$1,547,195.00	Orange
Michelle Cheverton-Lett, Tim Lett	830 Hartford Ln La Habra CA 90631	292-513-16	ROC67598N-160202	160512-BE-CA-RA2-R-06-10C	\$1,950.69	\$0.00	X	X	\$1,950.69	\$195.07	\$58.52	\$2,204.28	\$225,758.00	Orange
Marsha Carter, Victor Woodward	16882 Rancho Ln Yorba Linda CA 92886	334-192-06	ROC72392N-151013	160512-BE-CA-RA2-R-06-10C	\$13,752.16	\$6,876.08		X	\$6,876.08	\$687.61	\$206.28	\$7,769.97	\$385,868.00	Orange
Michele Smith	5188 Piccadilly Cir Westminster CA 92683	195-412-32	ROC71102N-151106	160512-BE-CA-RA2-R-08-20C	\$728.25	\$0.00	X	X	\$728.25	\$72.83	\$21.85	\$822.93	\$101,326.00	Orange
Sylvia Kobel	166 W Winston RD Anaheim CA 92805	082-402-06	ROC66797N-160219	160527-CA-RA-R-15C	\$2,533.80	\$0.00	X	X	\$2,533.80	\$253.38	\$76.01	\$2,863.19	\$60,562.00	Orange
Loc Mai	8861 Hazard Garden Grove CA 92844	097-322-44	CA059104921	160701-CA-RA-R-05C	\$5,542.30	\$0.00	X	X	\$5,542.30	\$554.23	\$166.27	\$6,262.80	\$399,646.00	Orange
John Brown, Kaitlin Brown	224 S Gain Ave Anaheim CA 92804	127-022-21	CA059105175	160708-CA-RA-R-10C	\$3,974.70	\$0.00	X	X	\$3,974.70	\$397.47	\$119.24	\$4,491.41	\$308,837.00	Orange
Thomas Iwashita	6496 Saipan St Cypress CA 90630	224-093-40	CA059105283	160729-CA-RA-R-05C	\$7,822.44	\$3,911.22		X	\$3,911.22	\$391.12	\$117.34	\$4,419.68	\$374,624.00	Orange
Ronald Wright	306 N Lindsay St Anaheim CA 92801	072-453-43	CA059104356	160805-CA-RA2-R-15C	\$2,286.01	\$0.00	X	X	\$2,286.01	\$228.60	\$68.58	\$2,583.19	\$106,154.00	Orange
Jaime Devera	6153 Piccadilly Cir Westminster CA 92683	224-075-08	CA059106147	160812-CA-RA-R-15C	\$1,640.25	\$820.13		X	\$820.12	\$82.01	\$24.60	\$926.73	\$83,203.00	Orange
Marian Criss	15770 Primrose Ln Westminster CA 92683	143-094-09	CA059106503	160923-CA-RA-R-20C	\$1,610.97	\$805.49		X	\$805.48	\$80.55	\$24.16	\$910.19	\$92,101.00	Orange
Louise Poitras	13802 Mills RD Garden Grove CA 92843	099-352-10	CA059106778	161028-CA-RA2-R-25C	\$3,655.03	\$0.00	X	X	\$3,655.03	\$365.50	\$109.65	\$4,130.18	\$64,247.00	Orange
Michael Schnell, Sandra Schnell	6106 E Garnet Cir Anaheim CA 92807	085-704-17	CA059107169	161118-CA-RA2-R-05C	\$2,234.38	\$0.00	X	X	\$2,234.38	\$223.44	\$67.03	\$2,524.85	\$318,560.00	Orange
Margaret Henry	13401 Lilly ST Garden Grove CA 92843	101-302-03	CA059108061	170113-CA-RA2-R-05C	\$5,158.05	\$0.00	X	X	\$5,158.05	\$515.81	\$154.74	\$5,828.60	\$75,724.00	Orange
James Nishioka	14572 Raintree Ln Tustin CA 92780	432-453-03	CA059107561	170127-CA-RA-R-10C	\$915.87	\$457.94		X	\$457.93	\$45.79	\$13.74	\$517.46	\$450,662.00	Orange
Kelly Goodman	406 W Wilshire Ave Santa Ana CA 92707	013-161-14	CA059108330	170224-CA-RA-R-20C	\$3,043.91	\$1,521.96		X	\$1,521.95	\$152.20	\$45.66	\$1,719.81	\$292,497.00	Orange
Anthony Cordero, DeAnna Cordero	28610 Brush Canyon Dr Yorba Linda CA 92887	353-501-37	CA059107749	170324-CA-RA3-R-25C	\$5,324.71	\$2,662.36		X	\$2,662.35	\$266.24	\$79.87	\$3,008.46	\$802,802.00	Orange
Marlene Lamaster	2932 Pemba DR Costa Mesa CA 92626	139-262-25	CA059108366	170407-CA-RA3-R-20C	\$5,611.00	\$2,805.50		X	\$2,805.50	\$280.55	\$84.17	\$3,170.22	\$103,667.00	Orange
Anthony Cordero, DeAnna Cordero	28610 Brush Canyon Dr Yorba Linda CA 92887	353-501-37	CA059109620	170908-CA-RA-HPR-R-25C	\$3,354.65	\$1,677.33		X	\$1,677.32	\$167.73	\$50.32	\$1,895.37	\$802,802.00	Orange
George Silva, Angelica Silva	4346 Addington Dr Anaheim CA 92807	359-084-09	CA059111527	180420-CA-RA-HPR-R-10CDE	\$5,294.51	\$0.00	X	X	\$5,294.51	\$529.45	\$158.84	\$5,982.80	\$729,641.00	Orange
Urson Russell	2418 MINUTEMAN WAY Costa Mesa CA 92626	419-162-12	CA059112263	181005-CA-RA-HPR-R-10E	\$1,347.68	\$0.00	X	X	\$1,347.68	\$134.77	\$40.43	\$1,522.88	\$302,977.00	Orange
Stacy Massey	17321 GIBSON CIR HUNTINGTON BEACH CA 92647	165-093-20	CA059112771	190419-CA-RA-HPR-R-05EF	\$1,852.46	\$0.00	X	X	\$1,852.46	\$185.25	\$55.57	\$2,093.28	\$120,916.00	Orange
Oscar Martinez, Eunice Loza Martinez	714 S PINE ST ANAHEIM CA 92805	036-174-11	CA059112820	190503-CA-RA-HPR-R-10FE	\$4,295.34	\$0.00	X	X	\$4,295.34	\$429.53	\$128.86	\$4,853.73	\$83,412.00	Orange
Eric Bonner, Louise Bonner	15241 Baton St Moreno Valley CA 92551	485-073-001	RWR83166C-130119	130301-01-IN-10	\$1,676.58	\$838.29		X	\$838.29	\$83.83	\$25.15	\$947.27	\$340,086.00	Riverside
Henry Tomas	7831 Casablanca St Riverside CA 92504	230-222-012	RWR68408N-130626	130719-01-IN-15	\$1,113.18	\$0.00	X	X	\$1,113.18	\$111.32	\$33.40	\$1,257.90	\$260,891.00	Riverside
Cindy Savage, Linda Savage	32101 Terra Cotta St Lake Elsinore CA 92530	389-531-013	RWR71122C-130601	130719-01-IN-20	\$2,170.84	\$1,085.42		X	\$1,085.42	\$108.54	\$32.56	\$1,226.52	\$257,855.00	Riverside
Alfred Zaragoza, Anita Zaragoza	5906 Bee Jay St Riverside CA 92503	151-041-007	RWR66660C-130709	130809-01-IN-20	\$2,308.88	\$1,154.44		X	\$1,154.44	\$115.44	\$34.63	\$1,301.51	\$38,886.00	Riverside
Cheryl Mendenhall, Ralph Mendenhall	1261 Oakcrest Cir Corona CA 92882	102-521-058	RWR60242N-130903	131004-WR-A-PB-R-10	\$2,820.54	\$1,410.27		X	\$1,410.27	\$141.03	\$42.31	\$1,593.61	\$308,561.00	Riverside
Grebel Pellum, James Pellum	1209 5th St Norco CA 92860	131-340-010	RWR62324C-130815	131101-WR-PB-R-20A	\$3,060.46	\$1,530.23		X	\$1,530.23	\$153.02	\$45.91	\$1,729.16	\$101,421.00	Riverside
Maria Borrell	5414 Kent Ave Riverside CA 92503	151-231-002	RWR54986C-131018	131108-WR-PB-R-15B	\$3,292.42	\$1,646.21		X	\$1,646.21	\$164.62	\$49.39	\$1,860.22	\$50,235.00	Riverside
George Flores	6936 Adler Pl Riverside CA 92503	155-333-021	RWR57064C-130928	131108-WR-PB-R-15B	\$1,805.20	\$0.00	X	X	\$1,805.20	\$180.52	\$54.16	\$2,039.88	\$198,404.00	Riverside
Arcel Manning	26110 Biloxi Dr Moreno Valley CA 92555	487-360-002	RWR57850C-130921	131108-WR-PB-R-15B	\$2,196.48	\$1,098.24		X	\$1,098.24	\$109.82	\$32.95	\$1,241.01	\$276,847.00	Riverside
Ermand Prewett, Michelle Black	11540 Dellwood Dr Riverside CA 92503	132-205-008	RWR60740C-130829	131122-WR-PB-R-20A	\$1,504.78	\$0.00	X	X	\$1,504.78	\$150.48	\$45.14	\$1,700.40	\$239,596.00	Riverside
Redona Cuneo	37263 Huckaby Ln Murrieta CA 92562	904-483-003	RWR51970N-131203	131220-WR-PB-R-15B	\$1,450.58	\$0.00	X	X	\$1,450.58	\$145.06	\$43.52	\$1,639.16	\$471,909.00	Riverside
Nancy Robertson	20960 Hunter St Perris CA 92570	319-182-052	RWR76076C-130415	140219-BE-R-05-10B	\$1,555.14	\$777.57		X	\$777.57	\$77.76	\$23.33	\$878.66	\$318,262.00	Riverside
Cookie Eichner, Robert Eichner	25500 Corte Promesa Murrieta CA 92563	912-151-005	RWR83964A-130107	140219-BE-R-05-10B	\$1,429.18	\$714.59		X	\$714.59	\$71.46	\$21.44	\$807.49	\$305,905.00	Riverside
Linda Doran, Michael Doran	27354 El Rancho Dr Sun City CA 92586	336-140-002	RWR63180N-130807	140219-BE-R-06-10C	\$1,532.06	\$766.03		X	\$766.03	\$76.60	\$22.98	\$865.61	\$260,885.00	Riverside
Matthew Toste	39257 Salinas DR Murrieta CA 92563	957-053-001	RWR86466C-121115	140219-BE-R-08-15B	\$2,593.93	\$0.00	X	X	\$2,593.93	\$259.39	\$77.82	\$2,931.14	\$299,439.00	Riverside
Donna Wooley	16065 Via Sola Lake Elsinore CA 92530	381-341-010	RWR70432C-130607	140219-BE-R-09-15C	\$2,096.18	\$1,048.09		X	\$1,048.09	\$104.81	\$31.44	\$1,184.34	\$221,643.00	Riverside
Elizabeth Torres, Jay Torres	8457 SYRACUSE Riverside CA 92508	284-121-002	RWR92426N-120705	140219-BE-R-10-20A	\$3,711.70	\$1,855.85		X	\$1,855.85	\$185.59	\$55.68	\$2,097.12	\$371,319.00	Riverside
Deborah St George, Dennis St George	889 S University Dr Riverside CA 92507	253-161-012	RWR74970C-130426	140219-BE-R-11-20B	\$2,350.60	\$0.00	X	X	\$2,350.60	\$235.06	\$70.52	\$2,656.18	\$611,850.00	Riverside
Glenn Elder, R Anne Elder	17075 Highcountry Cir Perris CA 92570	289-480-020	RWR83558N-130114	140219-BE-R-11-20B	\$5,134.52	\$2,567.26		X	\$2,567.26	\$256.73	\$77.02	\$2,901.01	\$545,570.00	Riverside
Stasha Sill	22751 Cove View Canyon Lake CA 92587	354-041-003	RWR84404N-121228	140219-BE-R-11-20B	\$2,179.30	\$0.00	X	X	\$2,179.30	\$217.93	\$65.38	\$2,462.61	\$301,467.00	Riverside
Claudia Blank, Whelington Mras	29139 Outrigger St Lake Elsinore CA 92530	389-463-001	RWR83680N-130111	140219-BE-R-11-20B	\$1,365.04	\$0.00	X	X	\$1,365.04	\$136.50	\$40.95	\$1,542.49	\$236,713.00	Riverside
Gloria Lee, Rodney Lee	8514 Todd Ct Riverside CA 92508	294-361-031	RWR72924C-130515	140219-BE-R-12-20C	\$3,298.64	\$0.00	X	X	\$3,298.64	\$329.86	\$98.96	\$3,727.46	\$279,528.00	Riverside
Frank Estrella	14646 Antilles Dr Moreno Valley CA 92553	484-194-009	RWR61764C-130820	140219-BE-R-12-20C	\$1,987.20	\$993.60		X	\$993.60	\$99.36	\$29.81	\$1,122.77	\$163,739.00	Riverside
Deanne Irwin, Richard Irwin	4967 Viceroy Ave Norco CA 92860	153-062-025	RWR49894A-140110	140312-BE-R-14-20	\$1,761.04	\$880.52		X	\$880.52	\$88.05	\$26.42	\$994.99	\$94,223.00	Riverside
Rose Marie Burrowes	16421 Wagon Wheel Dr Riverside CA 92506	245-460-013	RWR46217C-140221	140404-CA-PB-R-20B	\$814.40	\$407.20		X	\$407.20	\$40.72	\$12.22	\$460.14	\$121,805.00	Riverside
Betty Lusignan, J Lusignan	25037 Billie Dr Moreno Valley CA 92553	484-231-011	RWR39695N-140417	140509-CA-PB-R-20B	\$950.56	\$0.00	X	X	\$950.56	\$95.06	\$28.52	\$1,074.14	\$198,823.00	Riverside
Betty Lusignan, J Lusignan	25037 Billie Dr Moreno Valley CA 92553	484-231-011	RWR39695NB-140417	140516-CA-PB-R-20B	\$914.04	\$0.00	X	X	\$914.04	\$91.40	\$27.42	\$1,032.86	\$198,823.00	Riverside
Arcel Manning	25684 Shalu Ave Moreno Valley CA 92557	474-652-003	RWR52472C-131123	140523-CA-PB-R-20B	\$3,773.76	\$1,886.88		X	\$1,886.88	\$188.69	\$56.61	\$2,132.18	\$195,787.00	Riverside
James Grace, Theresa Grace	9305 Sunridge Dr Riverside CA 92508	266-460-039	RWR46055C-140222	140530-CA-PB-R-20B	\$1,937.82	\$968.91		X	\$968.91	\$96.89	\$29.07	\$1,094.87	\$279,191.00	Riverside
Frances McQuinn, Michael McQuinn	22759 Inspiration Canyon Lake CA 92587	353-113-010	RWR37022P-140512	140606-CA-PB-R-15B	\$1,478.46	\$0.00	X	X	\$1,478.46	\$147.85	\$44.35	\$1,670.66	\$192,386.00	Riverside
Anthony Gnagnarelli, Rachelle Gnagnarelli	26070 Lucille Cir Murrieta CA 92562	909-220-026	RWR47423A-140210	140627-CA-PB-R-20B	\$4,664.96	\$2,332.48		X	\$2,332.48	\$233.25	\$69.97	\$2,635.70	\$386,356.00	Riverside
Carolyn Posey, Harold Posey	28950 Bay Ave Moreno Valley CA 92555	478-210-062	RWR33107N-140616	140703-CA-PB-R-15B	\$1,412.24	\$706.12		X	\$706.12	\$70.61	\$21.18	\$797.91	\$187,808.00	Riverside
Darilyn Ocasia, Leocigario Rivera	30324 Lamplighter Ln Menifee CA 92584	364-260-040	RWR47255A-140212	140718-CA-PB-R-15B	\$3,457.98	\$0.00	X	X	\$3,457.98	\$345.80	\$103.74	\$3,907.52	\$371,952.00	Riverside
John Wilkins, Katrina Wilkins	39580 Garin DR Murrieta CA 9256													

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Christine Sadovsky, Edward Sadovsky	2885 Monroe St Riverside CA 92504	238-071-002	RWR89589C-150806	151022-BE-WR-R-05-15C	\$1,985.94	\$992.97		X	\$992.97	\$99.30	\$29.79	\$1,122.06	\$217,643.00	Riverside
Kimberly Bakos	30180 Merrell Ct Desert CA 92567	427-042-012	RWR94305N-150601	151022-BE-WR-R-05-15C	\$1,759.52	\$879.76		X	\$879.76	\$87.98	\$26.39	\$994.13	\$219,808.00	Riverside
Dionne Camacho	64421 Diegel Ct Nuevo Hot Springs CA 92240	661-072-017	RER94532N-150613	151022-BE-WR-R-05-15C	\$2,087.78	\$1,043.89		X	\$1,043.89	\$104.39	\$31.32	\$1,179.60	\$256,961.00	Riverside
Becky Hoffman	6131 Dodd St Mira Loma CA 91752	161-331-004	RWR94527C-150529	151022-BE-WR-R-07-20C	\$2,846.28	\$1,423.14		X	\$1,423.14	\$142.31	\$42.69	\$1,608.14	\$172,487.00	Riverside
Anmarie Diaz	16490 Arnold Ave Lake Elsinore CA 92530	378-201-007	RWR89095N-150813	160114-BE-WR-R-02-10C	\$945.02	\$472.51		X	\$472.51	\$47.25	\$14.18	\$533.94	\$225,389.00	Riverside
Edmundo Valencia	21575 High St Perris CA 92570	318-270-078	RWR94377N-150531	160114-BE-WR-R-03-15C	\$1,277.70	\$638.85		X	\$638.85	\$63.89	\$19.17	\$721.91	\$97,030.00	Riverside
Irene Bilous, Mykola Bilous	65774 5th St Desert Hot Springs CA 92240	664-181-033	RER92960N-150826	160114-BE-WR-R-03-15C	\$1,592.72	\$0.00	X	X	\$1,592.72	\$159.27	\$47.78	\$1,799.77	\$101,348.00	Riverside
Sheila Cabral	30400 Lakeview Ave Nuevo CA 92567	426-450-015	RWR87043N-150909	160114-BE-WR-R-04-20C	\$5,103.78	\$2,551.89		X	\$2,551.89	\$255.19	\$76.56	\$2,883.64	\$333,615.00	Riverside
Elizabeth Laird	39582 Montebello Way Murrieta CA 92563	913-390-025	RWR86685N-150914	160114-BE-WR-R-04-20C	\$6,679.16	\$0.00	X	X	\$6,679.16	\$667.92	\$200.37	\$7,547.45	\$460,000.00	Riverside
Azsa Barrera	41303 Cruz Way Temecula CA 92592	927-330-020	RWR90231A-150728	160114-BE-WR-R-04-20C	\$5,474.70	\$0.00	X	X	\$5,474.70	\$547.47	\$164.24	\$6,186.41	\$213,862.00	Riverside
Carolyn Millette	605 Park Ln Corona CA 92879	111-021-006	RWR85201N-151006	160114-BE-WR-R-06-10C	\$2,962.76	\$1,481.38		X	\$1,481.38	\$148.14	\$44.44	\$1,673.96	\$272,998.00	Riverside
Mary Kiper, Vincent Kiper	40597 Sunflower Rd Murrieta CA 92562	949-481-004	RWR87261C-150905	160114-BE-WR-R-07-15C	\$1,997.96	\$998.98		X	\$998.98	\$99.90	\$29.97	\$1,128.85	\$238,705.00	Riverside
Victoria Vanwinkle	11845 Kitching ST Moreno Valley CA 92557	474-152-009	RWR89869N-150803	160114-BE-WR-R-08-20C	\$4,385.56	\$0.00	X	X	\$4,385.56	\$438.56	\$131.57	\$4,955.69	\$77,699.00	Riverside
Brian Swanson, Laree Swanson	263 Galiceno Dr San Jacinto CA 92582	436-334-001	CA065103942	160506-CA-RA-R-15C	\$2,025.90	\$0.00	X	X	\$2,025.90	\$202.59	\$60.78	\$2,289.27	\$150,245.00	Riverside
Leonard Shockley	746 W Cottonwood Rd Banning CA 92220	540-091-019	RWR83797N-151027	160512-BE-CA-RA2-R-07-15C	\$1,978.00	\$0.00	X	X	\$1,978.00	\$197.80	\$59.34	\$2,235.14	\$72,391.00	Riverside
Juan Morin, Sylvia Morin	52234 Oasis Palms Ave Coachella CA 92236	778-261-025	RER91589N-151108	160512-BE-CA-RA2-R-07-15C	\$2,201.68	\$0.00	X	X	\$2,201.68	\$220.17	\$66.05	\$2,487.90	\$82,125.00	Riverside
Joanna Sipler	30150 Emerald Ln Hemet CA 92543	469-060-030	RWR77907N-160218	160512-BE-CA-RA2-R-08-20C	\$2,259.00	\$0.00	X	X	\$2,259.00	\$225.90	\$67.77	\$2,552.67	\$150,048.00	Riverside
Linda Rodriguez	25950 Brodiaea Ave Moreno Valley CA 92553	484-072-005	RWR84163N-151021	160512-BE-CA-RA2-R-08-20C	\$2,446.56	\$0.00	X	X	\$2,446.56	\$244.66	\$73.40	\$2,846.62	\$284,237.00	Riverside
Cheryl Blackowl, Michelle Hansen	45265 Cash DR Hemet CA 92544	548-200-009	RWR88493N-150820	160512-BE-CA-RA2-R-08-20C	\$1,573.64	\$786.82		X	\$786.82	\$78.68	\$23.60	\$889.10	\$154,331.00	Riverside
Frank Desma, Maryann Desma	3820 Bella Villagio Ave Perris CA 92571	308-324-007	RWR85781N-150928	160512-BE-CA-RA-R-04-20C	\$4,284.40	\$0.00	X	X	\$4,284.40	\$428.44	\$128.53	\$4,841.37	\$293,121.00	Riverside
Michelle Beal	2001 E Camino Parocela I64 Palm Springs CA 92264	502-561-064	RER91028N-151217	160512-BE-CA-RA-R-04-20C	\$2,934.34	\$0.00	X	X	\$2,934.34	\$293.43	\$88.03	\$3,315.80	\$229,549.00	Riverside
Sonia Cervantes, Teodoro Cervantes	26272 Amen St Hemet CA 92544	552-420-006	RWR86129N-150922	160512-BE-CA-RA-R-04-20C	\$3,922.40	\$1,961.20		X	\$1,961.20	\$196.12	\$58.84	\$2,216.16	\$399,767.00	Riverside
Alannah Loeb-Glover, Marc Fliegel	23430 Vista Way Canyon Lake CA 92587	351-102-030	RWR82653N-151117	160520-CA-RA-R-20C	\$2,083.98	\$1,041.99		X	\$1,041.99	\$104.20	\$31.26	\$1,177.45	\$70,582.00	Riverside
Albert Seip	33627 Bessemer Ave Hemet CA 92545	458-211-008	CA065104491	160527-CA-RA-R-10C	\$2,003.40	\$0.00	X	X	\$2,003.40	\$200.34	\$60.10	\$2,263.84	\$40,302.00	Riverside
Rebecca Martinez-Rodriguez, Steven Rodriguez	1862 Tennyson St San Jacinto CA 92583	439-342-016	CA065103956	160603-CA-RA2-R-20C	\$3,370.72	\$1,685.36		X	\$1,685.36	\$168.54	\$50.56	\$1,904.46	\$248,255.00	Riverside
Malinda Diebold, Robert Diebold	14660 Joshua Tree Ave Moreno Valley CA 92553	482-511-003	CA065106107	160701-CA-RA-R-15C	\$2,181.88	\$1,090.94		X	\$1,090.94	\$109.09	\$32.73	\$1,232.76	\$153,826.00	Riverside
Nancy Claunch	544 N Paseo De Anza Palm Springs CA 92262	507-293-016	CA065103501	160701-CA-RA-R-20C	\$2,233.68	\$0.00	X	X	\$2,233.68	\$223.37	\$67.01	\$2,524.06	\$112,189.00	Riverside
Jose Alvarez	33508 Orange St Wildomar CA 92595	366-260-001	RWR7879A-160202	160708-CA-RA-R-20C	\$2,080.17	\$1,040.09		X	\$1,040.08	\$104.01	\$31.20	\$1,175.29	\$279,171.00	Riverside
Debbie Meehan	23651 Casa Bonita Ave Canyon Lake CA 92587	351-096-015	CA065105835	160715-CA-RA2-R-15C	\$1,783.12	\$891.56		X	\$891.56	\$89.16	\$26.75	\$1,007.47	\$108,501.00	Riverside
Rachele Dale	8525 Cedano Ln Corona CA 92880	130-652-010	CA065105606	160715-CA-RA2-R-20C	\$1,576.60	\$0.00	X	X	\$1,576.60	\$157.66	\$47.30	\$1,781.56	\$391,044.00	Riverside
Earnest Ybarra	5443 Polo Ct Riverside CA 92509	185-312-008	CA065106172	160722-CA-RA-R-15C	\$1,292.46	\$0.00	X	X	\$1,292.46	\$129.25	\$38.77	\$1,460.48	\$139,722.00	Riverside
Franklin Tarnoski	38029 Murrieta Creek Dr Murrieta CA 92562	904-620-004	CA065106351	160722-CA-RA-R-20C	\$3,173.32	\$1,586.66		X	\$1,586.66	\$158.67	\$47.60	\$1,792.93	\$646,630.00	Riverside
Lucia Trujillo	2595 Heritage DR Corona CA 92882	112-273-009	CA065107060	160729-CA-RA-R-15C	\$2,634.62	\$1,317.31		X	\$1,317.31	\$131.73	\$39.52	\$1,488.56	\$338,205.00	Riverside
Blanca Sandoval	3925 Rubidoux Blvd Riverside CA 92509	181-071-040	CA065107680	160805-CA-RA2-R-20C	\$2,844.22	\$0.00	X	X	\$2,844.22	\$284.42	\$85.33	\$3,213.97	\$90,558.00	Riverside
Galindo Garcia, Maria Garcia	81616 De Oro Ave Indio CA 92021	608-203-029	CA065108381	160812-CA-RA-R-10C	\$2,913.70	\$1,456.85		X	\$1,456.85	\$145.69	\$43.71	\$1,646.25	\$163,749.00	Riverside
Franklin Tarnoski	38029 Murrieta Creek Dr Murrieta CA 92562	904-620-004	CA065107676	160812-CA-RA-R-15C	\$693.16	\$346.58		X	\$346.58	\$34.66	\$10.40	\$391.64	\$646,630.00	Riverside
Dava Diaz	840 S State St Hemet CA 92543	446-231-005	CA065104806	160812-CA-RA-R-20C	\$2,801.46	\$0.00	X	X	\$2,801.46	\$280.15	\$84.04	\$3,165.65	\$158,575.00	Riverside
Mary Kiper, Vincent Kiper	40597 Sunflower Rd Murrieta CA 92562	949-481-004	CA065107280	160812-CA-RA-R-20C	\$1,990.90	\$795.45		X	\$795.45	\$79.55	\$23.86	\$898.86	\$238,705.00	Riverside
Candace O'Mohundro, Larry O'Mohundro	45328 Driftwood DR Palm Desert CA 92260	625-430-036	CA065109023	160826-CA-RA2-R-10C	\$1,843.58	\$921.79		X	\$921.79	\$92.18	\$27.65	\$1,041.62	\$152,935.00	Riverside
Aileen Cortez	20863 Bayport Dr Riverside CA 92508	294-402-016	CA065104993	160826-CA-RA2-R-20C	\$1,196.22	\$598.11		X	\$598.11	\$59.81	\$17.94	\$675.86	\$202,066.00	Riverside
Juan De Sales, Maria De Sales	3959 Chardonay Dr Perris CA 92571	303-462-004	CA065104103	160902-CA-RA-R-15C	\$2,816.40	\$0.00	X	X	\$2,816.40	\$281.64	\$84.49	\$3,182.53	\$271,481.00	Riverside
Elaine Miller	15100 Robyn Ct Lake Elsinore CA 92530	387-430-011	CA065106535	160902-CA-RA-R-15C	\$2,063.20	\$0.00	X	X	\$2,063.20	\$206.32	\$61.90	\$2,331.42	\$311,368.00	Riverside
BeaAnn Avila	74131 Velardo Dr Palm Desert CA 92260	624-204-018	CA065110291	160916-CA-RA2-R-15C	\$2,129.48	\$0.00	X	X	\$2,129.48	\$212.95	\$63.88	\$2,406.31	\$130,819.00	Riverside
Dayna Dutton, Diane Dutton	351 S Cottonwood Ln Blythe CA 92225	854-110-004	CA065104601	160916-CA-RA2-R-20C	\$878.10	\$0.00	X	X	\$878.10	\$87.81	\$26.34	\$992.25	\$50,954.00	Riverside
Sonja Harrison	3441 Cannes AVE Riverside CA 92501	246-173-012	CA065107863	160923-CA-RA-R-20C	\$1,663.74	\$0.00	X	X	\$1,663.74	\$166.37	\$49.91	\$1,880.02	\$45,618.00	Riverside
James Harris	21626 Mary St Perris CA 92570	315-201-020	CA065103688	161007-CA-RA2-R-20C	\$3,142.08	\$1,571.04		X	\$1,571.04	\$157.10	\$47.13	\$1,775.27	\$283,287.00	Riverside
Cathy Greenblat	2142 S Toledo Ave Palm Springs CA 92264	009-600-193	CA065105368	161021-CA-RA-R-05C	\$2,028.64	\$1,014.32		X	\$1,014.32	\$101.43	\$30.43	\$1,146.18	\$842,731.00	Riverside
Tammy Hitchcock	8984 65th St Riverside CA 92509	163-130-012	CA065109806	161028-CA-RA2-R-15C	\$3,650.72	\$0.00	X	X	\$3,650.72	\$365.07	\$109.52	\$4,125.31	\$67,061.00	Riverside
Jaime Orozco	69667 Stonewood Ct Cathedral City CA 92234	670-322-032	CA065107409	161104-CA-RA-R-05C	\$6,142.58	\$3,071.29		X	\$3,071.29	\$307.13	\$92.14	\$3,470.56	\$320,332.00	Riverside
Hugo Jimenez, Maria Jimenez	2796 N Chuperosa Rd Palm Springs CA 92262	501-232-015	CA065109847	161104-CA-RA-R-10C	\$3,239.64	\$1,619.82		X	\$1,619.82	\$161.98	\$48.59	\$1,830.39	\$127,868.00	Riverside
Paul Valenzuela, Rachel Valenzuela	4810 Thistle Creek Way Hemet CA 92545	460-114-015	CA065110111	161114-CA-RA-R-20C	\$3,240.14	\$1,620.07		X	\$1,620.07	\$162.01	\$48.60	\$1,830.68	\$230,940.00	Riverside
Herbert Henry	10386 Santa Cruz Rd Desert Hot Springs CA 92240	639-033-005	CA065110606	161118-CA-RA2-R-20C	\$2,764.04	\$0.00	X	X	\$2,764.04	\$276.40	\$82.92	\$3,123.36	\$169,511.00	Riverside
Irene Chavarin	13903 Pepper St Moreno Valley CA 92553	291-191-017	CA065111633	161202-CA-RA-R-20C	\$1,712.82	\$0.00	X	X	\$1,712.82	\$171.28	\$51.38	\$1,935.48	\$101,361.00	Riverside
Helen Kemp	72875 Sonora Dr Palm Desert CA 92260	640-131-008	CA065112705	161202-CA-RA-R-20C	\$2,322.76	\$1,161.38		X	\$1,161.38	\$116.14	\$34.84	\$1,312.36	\$151,614.00	Riverside
Justin Lang, Nicole Lang	27394 Carlton Oaks St Murrieta CA 92562	900-140-012	CA065109667	161202-CA-RA-R-25C	\$4,326.11	\$2,163.06		X	\$2,163.05	\$216.31	\$64.89	\$4,706.00	\$479,806.00	Riverside
Frank Amador	6863 Tarpan Ct Corona CA 92880	164-621-030	CA065108634	161209-CA-RA2-R-05C	\$12,967.96	\$0.00	X	X	\$12,967.96	\$1,296.80	\$389.04	\$14,653.80	\$619,081.00	Riverside
Estela Horner	7626 Lakeside DR Riverside CA 92509	183-261-017	CA065113455	170113-CA-RA2-R-20C	\$3,348.75	\$1,674.38		X	\$1,674.37	\$167.44	\$50.23	\$1,892.04	\$218,362.00	Riverside
Jeffrey Gutierrez, Jessica Longet	309 Country Club Blvd Lake Elsinore CA 92530	373-135-035	CA065113503	170120-CA-RA-R-15C	\$2,685.56	\$0.00	X	X	\$2,685.56	\$268.56	\$80.57	\$2,934.69	\$262,472	

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Estela Horner	7626 Lakeside DR Riverside CA 92509	183-261-017	CA065123435	171117-CA-RA-HPR-R-20C	\$1,562.23	\$781.12		X	\$781.11	\$78.11	\$23.43	\$882.65	\$218,362.00	Riverside
Irene Mueller	11398 Trust WAY Moreno Valley CA 92555	473-150-091	CA065118942	171117-CA-RA-HPR-R-25C	\$9,161.46	\$0.00	X	X	\$9,161.46	\$916.15	\$274.84	\$10,352.45	\$713,012.00	Riverside
Desirae Bailey	24868 Barito St Hemet CA 92544	549-472-011	CA065121267	171201-CA-RA-HPR-R-15C	\$2,563.10	\$0.00	X	X	\$2,563.10	\$256.31	\$76.89	\$2,896.30	\$358,677.00	Riverside
Karyn Johnson-Dorsey	1509 Ransom Rd Riverside CA 92506	252-113-009	CA065123322	171208-CA-RA-HPR-R-15C	\$1,180.62	\$0.00	X	X	\$1,180.62	\$118.06	\$35.42	\$1,334.10	\$546,611.00	Riverside
Derrick Richardson, George Morgan, Amber Morgan	32331 Rock Rose Dr Lake Elsinore CA 92532	363-722-002	CA065121700	171208-CA-RA-HPR-R-25C	\$4,237.26	\$0.00	X	X	\$4,237.26	\$423.73	\$127.12	\$4,788.11	\$407,330.00	Riverside
Hortencia Soto	1374 W San Geronio ST Blythe CA 92225	836-154-010	CA065123454	171208-CA-RA-HPR-R-25C	\$1,553.14	\$776.57		X	\$776.57	\$77.66	\$23.30	\$877.53	\$50,027.00	Riverside
Bernabeth Nunez	82409 Junipero St Indio CA 92201	610-133-006	CA065122269	171222-CA-RA-HPR-R-10C	\$4,113.88	\$2,056.94		X	\$2,056.94	\$205.69	\$61.71	\$2,324.34	\$69,396.00	Riverside
Sandy Loeb	29775 Alicante Dr Romoland CA 92585	327-420-003	CA065122591	171222-CA-RA-HPR-R-25C	\$4,182.72	\$2,091.36		X	\$2,091.36	\$209.14	\$62.74	\$2,363.24	\$201,519.00	Riverside
James Holston, Travis Holston, Terry Holston	26065 Musick RD Menifee CA 92584	360-160-010	CA065121647	180119-CA-RA-HPR-R-25C	\$4,444.86	\$2,222.43		X	\$2,222.43	\$222.24	\$66.67	\$2,511.34	\$240,818.00	Riverside
Ruben Perez, Maria Perez	20973 Myron St Perris CA 92570	319-161-012	CA065124494	180202-CA-RA-HPR-R-10CD	\$2,449.24	\$1,224.62		X	\$1,224.62	\$122.46	\$36.74	\$1,383.82	\$99,519.00	Riverside
Melissa Leahy, Vickie Rodriguez	33220 Schaper ST Lake Elsinore CA 92530	382-034-008	CA065124508	180202-CA-RA-HPR-R-15CD	\$2,141.62	\$0.00	X	X	\$2,141.62	\$214.16	\$64.25	\$2,420.03	\$175,529.00	Riverside
Darcy Levesque	1106 S Driftwood Dr Palm Springs CA 92264	508-393-010	CA065124273	180202-CA-RA-HPR-R-25CD	\$5,062.86	\$2,531.43		X	\$2,531.43	\$253.14	\$75.94	\$2,860.51	\$810,529.00	Riverside
Karyn Johnson-Dorsey	1509 Ransom Rd Riverside CA 92506	252-113-009	CA065123371	180216-CA-RA-HPR-R-15CD	\$1,853.18	\$0.00	X	X	\$1,853.18	\$185.32	\$55.60	\$2,094.10	\$546,611.00	Riverside
David Gonzalez	52650 Eisenhower Dr La Quinta CA 92253	773-301-008	CA065123729	180302-CA-RA-HPR-R-25CD	\$1,531.26	\$765.63		X	\$765.63	\$76.56	\$22.97	\$865.16	\$103,496.00	Riverside
Margaret Bonilla	206 E Kendall ST Corona CA 92879	109-043-010	CA065123817	180316-CA-RA-HPR-R-25CD	\$1,525.08	\$0.00	X	X	\$1,525.08	\$152.51	\$45.75	\$1,723.34	\$31,393.00	Riverside
Eluterio Torres	11355 Hubbard St Moreno Valley CA 92557	475-080-008	CA065124135	180427-CA-RA-HPR-R-25CDE	\$5,302.16	\$2,651.08		X	\$2,651.08	\$265.11	\$79.53	\$2,995.72	\$260,383.00	Riverside
Richard Slater, Margaret Slater	29967 GULF STREAM DR Canyon Lake CA 92587	351-184-011	CA065126342	180622-CA-RA-HPR-R-25CDE	\$3,352.38	\$0.00	X	X	\$3,352.38	\$335.24	\$100.57	\$3,788.19	\$268,301.00	Riverside
Sham Lal	341 MARIPOSA TRL Blythe CA 92225	842-142-003	CA065126325	180727-CA-RA-HPR-R-15DE	\$2,658.82	\$1,329.41		X	\$1,329.41	\$132.94	\$39.88	\$1,502.23	\$265,440.00	Riverside
Lynn Fashempour	10330 BEL AIR DR Cherry Valley CA 92223	402-391-023	CA065127275	180907-CA-RA-HPR-R-20DE	\$1,408.30	\$0.00	X	X	\$1,408.30	\$140.83	\$42.25	\$1,591.38	\$127,635.00	Riverside
Maria Munoz, Enrique Munoz	31251 LAS FLORES WAY Thousand Palms CA 92276	650-152-011	CA065128365	190118-CA-RA-HPR-R-25EF	\$3,358.18	\$1,679.09		X	\$1,679.09	\$167.91	\$50.37	\$1,897.37	\$118,735.00	Riverside
James Keena	443 TAVA LN Palm Desert CA 92211	632-330-068	CA065128283	190222-CA-RA-HPR-R-20EF	\$1,734.34	\$867.17		X	\$867.17	\$86.72	\$26.02	\$979.91	\$123,803.00	Riverside
Todd Lange	42819 TIERRA ROBLES PL Temecula CA 92592	944-121-019	CA065128323	190329-CA-RA-HPR-R-20EF	\$2,398.60	\$1,199.30		X	\$1,199.30	\$119.93	\$35.98	\$1,355.21	\$197,908.00	Riverside
Estela Horner	7626 Lakeside DR Riverside CA 92509	183-261-017	CA065129056	190517-CA-RA-HPR-R-15EF	\$1,250.00	\$625.00		X	\$625.00	\$62.50	\$18.75	\$706.25	\$218,362.00	Riverside
Antonio Garcia, Glafira Garcia	16762 MOCKINGBIRD CANYON RD RIVERSIDE CA 92504	273-040-017	CA065130066	200327-CA-RA-HPR-R-25F	\$3,859.84	\$0.00	X	X	\$3,859.84	\$385.98	\$115.80	\$4,361.62	\$453,449.00	Riverside
Manuel Barbosa, Enriqueta Barbosa	11104 SPAULDING RD RIVERSIDE CA 92505	142-341-002	CA065130514	200714-CA-RA-HPR-R-10FG	\$1,425.96	\$712.98		X	\$712.98	\$71.30	\$21.39	\$805.67	\$212,190.00	Riverside
Stephan Saak	4130 Debra Cir Oceanside CA 92056	162-282-09-00	RSD94868C-140317	140425-CA-PB-R-15B	\$1,225.58	\$0.00	X	X	\$1,225.58	\$122.56	\$36.77	\$1,384.91	\$301,810.00	San Diego
Harry Sweeney, Pamela Sulzbach	1836 Klauer San Diego CA 92114	544-080-24-00	RSD80612N-141015	150406-BE-R-02-10	\$4,862.62	\$0.00	X	X	\$4,862.62	\$486.26	\$145.88	\$5,494.76	\$212,908.00	San Diego
Lorena Lozano	1370 Cassiopeia Ln San Diego CA 92154	631-292-12-13	RSD91991C-140703	150406-BE-R-02-10	\$1,140.22	\$0.00	X	X	\$1,140.22	\$114.02	\$34.21	\$1,288.45	\$344,493.00	San Diego
Fortunato Yambao, Janet Yambao	14232 Merion Cir Valley Center CA 92082	189-330-08-00	RSD86654C-140820	150406-BE-R-04-20	\$5,576.32	\$0.00	X	X	\$5,576.32	\$557.63	\$167.29	\$6,301.24	\$646,881.00	San Diego
Bonnie Green	13342 Scotsman Rd Lakeside CA 92040	397-090-46-00	RSD86624N-140821	150406-BE-R-04-20	\$2,173.81	\$0.00	X	X	\$2,173.81	\$217.38	\$65.21	\$2,456.40	\$451,369.00	San Diego
John Park, Penelope Park	13442 Piping Rock Ln El Cajon CA 92021	401-202-38-00	RSD82829C-140924	150406-BE-R-04-20	\$2,249.22	\$0.00	X	X	\$2,249.22	\$224.92	\$67.48	\$2,541.62	\$608,874.00	San Diego
Cynthia Hancock	5947 Carnegie St San Diego CA 92122	670-222-08-00	RSD68924N-150311	150713-BE-WR-R-03-10C	\$1,845.14	\$922.57		X	\$922.57	\$92.26	\$27.68	\$1,042.51	\$91,815.00	San Diego
Charles Burruss	6788 Tuxedo Rd San Diego CA 92119	371-211-45-00	RSD70586C-150223	150713-BE-WR-R-08-20B	\$5,684.84	\$0.00	X	X	\$5,684.84	\$568.48	\$170.55	\$6,423.87	\$814,147.00	San Diego
LaMar Brown	4965 Mount Helix Dr La Mesa CA 91941	496-160-04-00	RSD81017N-141012	150713-BE-WR-R-08-20B	\$13,956.88	\$0.00	X	X	\$13,956.88	\$1,395.69	\$418.71	\$15,771.28	\$942,669.00	San Diego
Shirley Gieser	2723 E 14th St National City CA 91950	558-120-13-00	RSD70697C-150221	150713-BE-WR-R-08-20B	\$1,076.04	\$0.00	X	X	\$1,076.04	\$107.60	\$32.28	\$1,215.92	\$72,660.00	San Diego
James Stahlschmidt	6831 Ives Ct San Diego CA 92111	437-102-03-00	RSD58712NB-150623	151022-BE-WR-R-03-10C	\$2,698.42	\$0.00	X	X	\$2,698.42	\$269.84	\$80.95	\$3,049.21	\$250,083.00	San Diego
Corrita Hughes	3185 L St San Diego CA 92102	545-302-13-00	RSD64004N-150430	151022-BE-WR-R-03-10C	\$3,765.50	\$0.00	X	X	\$3,765.50	\$376.55	\$112.97	\$4,255.02	\$117,097.00	San Diego
Nelson McCrady	3666 Sutter Ct Oceanside CA 92056	169-531-36-00	RSD62738C-150513	151022-BE-WR-R-07-20C	\$1,899.12	\$849.56		X	\$849.56	\$84.96	\$25.49	\$960.01	\$379,151.00	San Diego
James Stahlschmidt	6831 Ives Ct San Diego CA 92111	437-102-03-00	RSD58712N-150623	151022-BE-WR-R-07-20C	\$4,164.95	\$0.00	X	X	\$4,164.95	\$416.50	\$124.95	\$4,706.40	\$250,083.00	San Diego
Mark Livingston, Michelle Livingston	4432 Marraco Dr San Diego CA 92115	473-091-07-00	RSD49484N-150909	151022-BE-WR-R-07-20C	\$2,984.00	\$0.00	X	X	\$2,984.00	\$298.40	\$89.52	\$3,371.92	\$281,245.00	San Diego
Linda Stockdale	1243 Saxony Rd Encinitas CA 92024	254-353-14-00	RSD51149N-150827	160114-BE-WR-R-02-10C	\$1,676.71	\$0.00	X	X	\$1,676.71	\$167.67	\$50.30	\$1,894.68	\$575,818.00	San Diego
Patricia Sanders	2470 Daily Dr Fallbrook CA 92028	101-552-09-00	RSD47438A-150925	160114-BE-WR-R-03-15C	\$2,932.22	\$0.00	X	X	\$2,932.22	\$293.22	\$87.97	\$3,313.41	\$694,200.00	San Diego
Albert Ye, Pingping Tian	40745 Via Ranchitos Fallbrook CA 92028	102-180-91-00	RSD55208N-150723	160114-BE-WR-R-04-20C	\$2,636.41	\$0.00	X	X	\$2,636.41	\$263.64	\$79.09	\$2,979.14	\$860,586.00	San Diego
Jackie Kennedy	10425 Nate WAY Santee CA 92071	381-232-20-00	RSD52037N-150820	160114-BE-WR-R-06-10C	\$2,840.20	\$0.00	X	X	\$2,840.20	\$284.02	\$85.21	\$3,209.43	\$150,795.00	San Diego
James Stahlschmidt	6831 Ives Ct San Diego CA 92111	437-102-03-00	RSD49559A-150909	160114-BE-WR-R-08-20C	\$2,031.54	\$0.00	X	X	\$2,031.54	\$203.15	\$60.95	\$2,295.64	\$250,083.00	San Diego
Brittany Gale, Julie Gale, Larry Gale	2941 Lancaster Rd Carlsbad CA 92010	167-461-03-00	RSD50237N-150902	160512-BE-CA-RA2-R-08-20C	\$2,066.44	\$1,033.22		X	\$1,033.22	\$103.32	\$31.00	\$1,167.54	\$529,868.00	San Diego
James Stahlschmidt	6831 Ives Ct San Diego CA 92111	437-102-03-00	RSD36170N-160209	160512-BE-CA-RA2-R-08-20C	\$1,422.73	\$0.00	X	X	\$1,422.73	\$142.27	\$42.68	\$1,607.68	\$250,083.00	San Diego
John Holly	944 Tarento Dr San Diego CA 92106	531-531-08-00	RSD37478N-160126	160512-BE-CA-RA2-R-08-20C	\$6,037.82	\$3,018.91		X	\$3,018.91	\$301.89	\$90.57	\$3,411.37	\$99,220.00	San Diego
Linda Stockdale	1243 Saxony Rd Encinitas CA 92024	254-353-14-00	RSD51149NB-150827	160512-BE-CA-RA-R-03-15C	\$5,771.63	\$0.00	X	X	\$5,771.63	\$577.16	\$173.15	\$6,521.94	\$575,818.00	San Diego
Rocio Ramirez, Victor Ramirez	29733 Castleridge Rd Valley Center CA 92082	185-250-29-00	CA073106154	160513-CA-RA2-R-20C	\$3,258.76	\$0.00	X	X	\$3,258.76	\$325.88	\$97.76	\$3,682.40	\$440,946.00	San Diego
James Brewer	4311 Tecumseh Way San Diego CA 92117	360-372-03-00	CA073105855	160520-CA-RA-R-10C	\$3,750.64	\$0.00	X	X	\$3,750.64	\$375.06	\$112.52	\$4,238.22	\$74,241.00	San Diego
Bonnie Green	13342 Scotsman Rd Lakeside CA 92040	397-090-46-00	CA073106902	160617-CA-RA-R-20C	\$1,238.27	\$0.00	X	X	\$1,238.27	\$123.83	\$37.15	\$1,399.25	\$451,369.00	San Diego
Ernest Roark	3749 Bonita Glen Ter Bonita CA 91902	594-190-22-00	CA073107483	160624-CA-RA2-R-15C	\$8,814.66	\$0.00	X	X	\$8,814.66	\$881.47	\$84.44	\$3,180.57	\$820,579.00	San Diego
Anna Burgos, Victor Burgos	8876 Delrose Ave Spring Valley CA 91977	583-474-15-00	RSD41069N-151204	160624-CA-RA2-R-20C	\$1,563.80	\$0.00	X	X	\$1,563.80	\$156.38	\$46.91	\$1,767.09	\$52,630.00	San Diego
Thomas Smiley, Verma Smiley	13222 Medallion LN Lakeside CA 92040	397-402-52-00	CA073107785	160722-CA-RA-R-15C	\$2,810.10	\$1,405.05		X	\$1,405.05	\$140.51	\$42.15	\$2,666.42	\$266,422.00	San Diego
Marc Brown, Pamela Park-brown	1191 Neptune Dr Chula Vista CA 91911	620-203-02-00	CA073107170	160729-CA-RA-R-20C	\$3,242.08	\$0.00	X	X	\$3,242.08	\$324.21	\$97.26	\$3,663.55	\$83,540.00	San Diego
Dolores Arellano	3760 Acacia ST San Diego CA 92113	550-650-11-00	CA073108999	160819-CA-RA-R-10C	\$2,252.90	\$0.00	X	X	\$2,252.90	\$225.29	\$67.59	\$2,545.78	\$34,555.00	San Diego
Albert Ye, Pingping Tian	40745 Via Ranchitos Fallbrook CA 92028	102-180-91-00	CA073110154	160902-CA-RA-R-05C	\$4,381.32									

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Brittney Price, Joshua Price	9942 VIA WAKEFIELD Santee CA 92071	381-320-17-00	CA073123480	181005-CA-RA-HPR-R-10E	\$1,789.64	\$0.00	X	X	\$1,789.64	\$178.96	\$53.69	\$2,022.29	\$443,946.00	San Diego
Melissa Collins	421 S Euclid Ave San Diego CA 92114	548-411-01-00	CA073125003	191101-CA-RA-HPR-R-25F	\$3,000.00	\$0.00	X	X	\$3,000.00	\$300.00	\$90.00	\$3,390.00	\$100,804.00	San Diego
Victoria Morgan	274 Montana St San Francisco CA 94112	7055 /011	CA075106689	170505-CA-RA3-HPR-R-15C	\$1,503.36	\$751.68	X	X	\$751.68	\$75.17	\$22.55	\$849.40	\$55,864.00	San Francisco
Denise Wright-Washington	812 Peru Ave San Francisco CA 94112	5963 /001A	CA075106778	170519-CA-RA3-HPR-R-25C	\$6,641.66	\$0.00	X	X	\$6,641.66	\$664.17	\$199.25	\$7,505.08	\$106,980.00	San Francisco
Ida Coleman	30 Jules Ave San Francisco CA 94112	7013 /030	CA075106833	170922-CA-RA-HPR-R-15C	\$1,875.16	\$0.00	X	X	\$1,875.16	\$187.52	\$56.25	\$2,118.93	\$53,508.00	San Francisco
Benjamin Niedert	9 B St Tracy CA 95376	235-085-050-000	CA077104365	160512-BE-CA-RA2-R-06-10C	\$3,812.10	\$0.00	X	X	\$3,812.10	\$381.21	\$114.36	\$4,307.67	\$110,804.00	San Joaquin
Damian Fermin, Maria Garcia	3608 El Dorado St Stockton CA 95204	115-162-120-000	RSJ88832N-160311	160512-BE-CA-RA-R-02-10C	\$1,679.68	\$0.00	X	X	\$1,679.68	\$167.97	\$50.39	\$1,898.04	\$80,890.00	San Joaquin
Manuel Mancera	2505 S Laurel St Stockton CA 95206	171-220-080-000	CA077104769	160805-CA-RA2-R-20C	\$2,740.48	\$0.00	X	X	\$2,740.48	\$274.05	\$82.21	\$3,096.74	\$134,606.00	San Joaquin
Denise Delgadillo	2488 E Market St Stockton CA 95205	153-220-540-000	CA077105179	160819-CA-RA-R-10C	\$2,868.00	\$1,434.00	X	X	\$1,434.00	\$143.40	\$43.02	\$1,620.42	\$39,254.00	San Joaquin
Wanda Hunt	1037 Wetherbee Ave Manteca CA 95337	241-055-130-000	CA077106100	161114-CA-RA-R-15C	\$998.34	\$499.17	X	X	\$499.17	\$49.92	\$14.98	\$564.07	\$166,941.00	San Joaquin
Alejandro Valencia-Yepetz, Maria Valencia	1817 Germain LN Stockton CA 95206	166-100-220-000	CA077105000	161118-CA-RA2-R-10C	\$1,966.93	\$0.00	X	X	\$1,966.93	\$196.69	\$59.01	\$2,222.63	\$226,495.00	San Joaquin
Alejandro Valencia-Yepetz, Maria Valencia	1817 Germain LN Stockton CA 95206	166-100-220-000	CA077105460	161118-CA-RA2-R-20C	\$1,853.43	\$0.00	X	X	\$1,853.43	\$185.34	\$55.60	\$2,094.37	\$226,495.00	San Joaquin
Efanye Chibuko	4351 Cherry Blossom LN Tracy CA 95377	244-380-230-000	CA077106497	170113-CA-RA2-R-15C	\$2,782.60	\$1,391.30	X	X	\$1,391.30	\$139.13	\$41.74	\$1,572.17	\$386,793.00	San Joaquin
Richard Focacci	229 1st St Lodi CA 95240	041-100-130-000	CA077106600	170609-CA-RA2-HPR-R-15C	\$1,744.64	\$0.00	X	X	\$1,744.64	\$174.46	\$52.34	\$1,971.44	\$144,105.00	San Joaquin
Lamont Gibson	2408 Learned AVE Stockton CA 95205	173-020-160-000	CA077106967	170616-CA-RA2-HPR-R-25C	\$5,442.12	\$0.00	X	X	\$5,442.12	\$544.21	\$163.26	\$6,149.59	\$272,025.00	San Joaquin
Albert Crispin, Julie Crispin	1659 S Olive Ave Stockton CA 95215	173-110-130-000	CA077107618	170714-CA-RA3-HPRCA2-R-15C	\$2,151.78	\$0.00	X	X	\$2,151.78	\$215.18	\$64.55	\$2,431.51	\$206,004.00	San Joaquin
Angela Spano	6513 El Capitan CIR Stockton CA 95210	094-320-550-000	CA077108121	170728-CA-RA3-HPRCA2-R-10C	\$1,861.32	\$0.00	X	X	\$1,861.32	\$186.13	\$55.84	\$2,103.29	\$235,131.00	San Joaquin
David Borba	719 W Oak St Stockton CA 95203	135-443-110-000	CA077107244	170922-CA-RA-HPR-R-10C	\$2,780.10	\$0.00	X	X	\$2,780.10	\$278.01	\$83.40	\$3,141.51	\$91,849.00	San Joaquin
Karen Yescas	401 N Hewitt Rd Linden CA 95236	093-030-320-000	CA077108218	171027-CA-RA-HPR-R-25C	\$3,945.10	\$0.00	X	X	\$3,945.10	\$394.51	\$118.35	\$4,457.96	\$203,589.00	San Joaquin
Danny Willingham	741 Edan AVE Stockton CA 95207	081-122-030-000	CA077108870	180112-CA-RA-HPR-R-15C	\$1,852.28	\$926.14	X	X	\$926.14	\$92.61	\$27.78	\$1,046.53	\$147,400.00	San Joaquin
Kirsten Miller	3631 Portage Cir Stockton CA 95219	098-490-040-000	CA077109674	180316-CA-RA-HPR-R-15CD	\$2,027.20	\$0.00	X	X	\$2,027.20	\$202.72	\$60.82	\$2,290.74	\$449,253.00	San Joaquin
Carolyn Dishman, Billy Dishman	223 S Locust AVE Ripon CA 95366	259-274-110-000	CA077109850	180504-CA-RA-HPR-R-25CED	\$2,053.78	\$0.00	X	X	\$2,053.78	\$205.38	\$61.61	\$2,320.77	\$271,797.00	San Joaquin
Alberto Perales	911 Lloyd ST Lodi CA 95240	047-430-490-000	CA077109807	180525-CA-RA-HPR-R-15CDE	\$756.99	\$0.00	X	X	\$756.99	\$75.70	\$22.71	\$855.40	\$59,445.00	San Joaquin
Alberto Perales	911 Lloyd ST Lodi CA 95240	047-430-490-000	CA077110095	180525-CA-RA-HPR-R-15CDE	\$1,114.75	\$0.00	X	X	\$1,114.75	\$111.48	\$33.44	\$1,259.67	\$59,445.00	San Joaquin
Carolyn Dishman, Billy Dishman	223 S Locust AVE Ripon CA 95366	259-274-110-000	CA077109816	180608-CA-RA-HPR-R-25CDE	\$4,191.80	\$0.00	X	X	\$4,191.80	\$419.18	\$125.75	\$4,736.73	\$271,797.00	San Joaquin
Mary Miller	201 N Oro Ave Stockton CA 95215	143-340-170-000	CA077109241	180614-CA-HLP-LEF-HPR-R-25AB-1	\$1,166.66	\$0.00	X	X	\$1,166.66	\$116.67	\$35.00	\$1,318.33	\$99,878.00	San Joaquin
Imelda Valdivia	2942 WAUSA WAY STOCKTON CA 95206	179-350-600-000	CA077110831	181005-CA-RA-HPR-R-25E	\$1,132.08	\$566.04	X	X	\$566.04	\$56.60	\$16.98	\$369.62	\$260,515.00	San Joaquin
Fernando Ugarte, Catherine Ugarte	165 WHELAN WAY MANTECA CA 95336	221-220-040-000	CA077111423	190517-CA-RA-HPR-R-10EF	\$2,205.90	\$1,102.95	X	X	\$1,102.95	\$110.30	\$33.09	\$1,246.34	\$433,000.00	San Joaquin
Kenneth Prewitt, Vicki Prewitt	1733 Cocomo Pl Manteca CA 95337	224-360-170-000	CA077111685	190906-CA-RA-HPR-R-05F	\$3,179.40	\$0.00	X	X	\$3,179.40	\$317.94	\$95.38	\$3,592.72	\$560,574.00	San Joaquin
Hilda Amaral	9528 BISMARCK PL STOCKTON CA 95209	078-310-330-000	CA077112169	200814-CA-RA-HPR-R-20FG	\$2,351.48	\$1,175.74	X	X	\$1,175.74	\$117.57	\$35.27	\$1,328.58	\$209,700.00	San Joaquin
Lilia Paredes	1743 S AMERICAN ST STOCKTON CA 95206	167-123-080-000	CA077112257	200911-CA-RA-HPR-R-15FG	\$2,028.52	\$0.00	X	X	\$2,028.52	\$202.85	\$60.86	\$2,292.23	\$42,119.00	San Joaquin
Christy Pagliaro, Christine Smith	948 Fulton St Redwood City CA 94061	053-078-080	CA081104385	170825-CA-RA-HPRCA4-R-15C	\$4,725.61	\$2,362.81	X	X	\$2,362.81	\$236.28	\$70.88	\$482,758.00	San Mateo	
Kevin Paugh, Loan Paugh	1360 Havenwood Dr San Jose CA 95132	589-19-008	RSC94286C-150214	150713-BE-WR-R-08-20B	\$1,495.30	\$0.00	X	X	\$1,495.30	\$149.53	\$44.86	\$1,689.69	\$1,070,295.00	Santa Clara
David Burgess	5816 Lalor Dr San Jose CA 95123	687-20-048	RSC92084C-160121	160708-CA-RA-R-05C	\$3,648.42	\$1,824.21	X	X	\$1,824.21	\$182.42	\$54.73	\$2,061.36	\$375,768.00	Santa Clara
Byron Papadopulo, Linda Papadopulo	384 Gridley St San Jose CA 95127	599-45-046	CA085102062	161028-CA-RA2-R-10C	\$1,669.34	\$834.67	X	X	\$834.67	\$83.47	\$25.04	\$943.18	\$71,228.00	Santa Clara
David Satre	4809 Minas Dr San Jose CA 95136	458-02-052	CA085102292	161118-CA-RA2-R-20C	\$1,157.18	\$0.00	X	X	\$1,157.18	\$115.72	\$34.72	\$1,307.62	\$481,912.00	Santa Clara
Vicente Diaz	1758 Margaret St San Jose CA 95116	481-28-042	CA085102993	170922-CA-RA-HPR-R-10C	\$2,705.36	\$1,352.68	X	X	\$1,352.68	\$135.27	\$40.58	\$1,528.53	\$53,559.00	Santa Clara
Sharlene Lopez	1402 WILLOWTREE CT San Jose CA 95118	451-02-095	CA085103433	181130-CA-RA-HPR-R-25E	\$1,492.60	\$0.00	X	X	\$1,492.60	\$149.26	\$44.78	\$1,686.64	\$90,866.00	Santa Clara
Lae Khanthavong	16795 China Gulch Dr Anderson CA 96007	205-740-012-000	CA089101490	180504-CA-RA-HPR-R-20CED	\$4,446.94	\$0.00	X	X	\$4,446.94	\$444.69	\$133.41	\$5,025.04	\$512,916.00	Shasta
Gerardo Franco	6290 Old Redwood Hwy Santa Rosa CA 95403	163-172-003-000	CA097102932	180112-CA-RA-HPR-R-20C	\$2,762.20	\$0.00	X	X	\$2,762.20	\$276.22	\$82.87	\$3,121.29	\$749,689.00	Sonoma
Douglas Hines, Sean Hines	2283 STORMY QUEEN PL Santa Rosa CA 95403	034-550-057-000	CA097103361	181103-CA-RA-HPR-R-25E	\$3,360.32	\$1,680.16	X	X	\$1,680.16	\$168.02	\$50.40	\$1,898.58	\$431,065.00	Sonoma
Linda Gonet	4515 HERON CT ROHNERT PARK CA 94928	160-440-094-000	CA097103559	200814-CA-RA-HPR-R-15FG	\$3,235.82	\$1,617.91	X	X	\$1,617.91	\$161.79	\$48.54	\$1,828.24	\$252,010.00	Sonoma
Andrea Mueller	1691 Valparaiso Turlock CA 95382	071-017-021-000	RSL95321N-141103	150406-BE-R-02-10	\$1,466.96	\$733.48	X	X	\$733.48	\$73.35	\$22.00	\$828.83	\$65,778.00	Stanislaus
Barbara Anchondo, Joseph Anchondo	2605 Crommelin Ave Modesto CA 95350	005-041-074-000	RSL94886N-141228	150713-BE-WR-R-06-15B	\$2,878.28	\$0.00	X	X	\$2,878.28	\$287.83	\$86.35	\$3,252.46	\$146,105.00	Stanislaus
Sean Choy	1605 Delphine Ave Modesto CA 95350	054-005-013-000	RSL89276N-160307	160512-BE-CA-RA-R-04-20C	\$3,518.12	\$0.00	X	X	\$3,518.12	\$351.81	\$105.54	\$3,975.47	\$245,378.00	Stanislaus
Sherry Bennett	905 Woodrow Ave Modesto CA 95350	055-013-028-000	CA099106403	160715-CA-RA2-R-15C	\$1,611.43	\$805.72	X	X	\$805.72	\$80.57	\$24.17	\$910.45	\$72,255.00	Stanislaus
Linda Perreira, Pete Perreira	2802 Canyon Dr Modesto CA 95351	039-054-056-000	CA099107118	161223-CA-RA-R-20C	\$2,043.99	\$1,022.00	X	X	\$1,022.00	\$102.20	\$30.66	\$1,154.85	\$141,304.00	Stanislaus
T. Adair Simmons	713 Thrasher Ave Modesto CA 95354	035-044-078-000	CA099106905	170324-CA-RA3-R-20C	\$2,609.68	\$0.00	X	X	\$2,609.68	\$260.97	\$78.29	\$2,948.94	\$41,584.00	Stanislaus
Carolyn Smith	1350 T St Newman CA 95360	128-004-042-000	CA099107614	170414-CA-RA3-HPR-R-15C	\$1,471.94	\$735.97	X	X	\$735.97	\$73.60	\$22.08	\$831.65	\$49,782.00	Stanislaus
Linda Perreira, Pete Perreira	2802 Canyon Dr Modesto CA 95351	039-054-056-000	CA099107376	170421-CA-RA-HPR-R-20C	\$1,179.97	\$589.99	X	X	\$589.99	\$59.00	\$17.70	\$666.68	\$141,304.00	Stanislaus
Victor John, Jason John	3001 Park Royal Dr Ceres CA 95307	053-039-077-000	CA099107601	170428-CA-RA3-HPR-R-15C	\$2,040.58	\$0.00	X	X	\$2,040.58	\$204.06	\$61.22	\$2,305.86	\$207,345.00	Stanislaus
Elvira Morales	1912 T St Newman CA 95360	128-026-031-000	CA099107588	170519-CA-RA3-HPR-R-25C	\$3,132.74	\$0.00	X	X	\$3,132.74	\$313.27	\$93.98	\$3,539.99	\$88,228.00	Stanislaus
Sherry Bennett	905 Woodrow Ave Modesto CA 95350	055-013-028-000	CA099107724	170616-CA-RA2-HPR-R-25C	\$1,688.85	\$844.43	X	X	\$844.43	\$84.44	\$25.33	\$954.19	\$72,255.00	Stanislaus
Paul Biesemeier	3904 Semallon Dr Modesto CA 95356	055-032-080-000	CA099108664	170804-CA-RA-HPR-R-15C	\$1,521.82	\$760.91	X	X	\$760.91	\$76.09	\$22.83	\$859.83	\$339,349.00	Stanislaus
Michael Inderbitzin	302 N Santa Ana AVE Modesto CA 95354	108-011-014-000	CA099108283	170825-CA-RA-HPRCA4-R-20C	\$2,704.26	\$0.00	X	X	\$2,704.26	\$270.43	\$81.13	\$3,055.82	\$61,100.00	Stanislaus
Manuel Escobar, Christine Escobar	3009 Gideon Way Ceres CA 95307	053-039-025-000	CA099108513	170915-CA-RA-HPR-R-10C	\$2,066.50	\$1,033.25	X	X	\$1,033.25	\$103.33	\$31.00	\$1,167.58	\$177,546.00	Stanislaus
Chad Willis	1829 Glouster Way Modesto CA 95350	054-008-051-000	CA099108635	171103-CA-RA-HPR-R-25C	\$2,909.82	\$0.00	X	X	\$2,909.82	\$290.98	\$87.29	\$3,288.09	\$131,168.00	Stanislaus
Kimberly Kuffel	3219 High St Riverbank CA 95367	132-004-020-000	CA099108996	171117-CA-RA-HPR										

Owner Name	Situs Address	Tax Parcel Number	Participant ID	Bond Series	Levy Amount	Paid Amount	Delinquent Installment		Delinquent Amount	Penalty [3]	Interest [4]	Total Delinquent Assessment	Total Assessed Value	County
							1st	2nd						
Patricia Smith	7403 Village 7 Camarillo CA 93012	170-0-090-165	CA111100950	160512-BE-CA-RA-R-03-15C	\$1,721.61	\$0.00	X	X	\$1,721.61	\$172.16	\$51.65	\$1,945.42	\$411,288.00	Ventura
Mary Davis, Shane Davis	820 E Yucca Oxnard CA 93033	219-0-414-065	RVT93581CB-151014	160512-BE-CA-RA-R-04-20C	\$3,721.95	\$0.00	X	X	\$3,721.95	\$372.20	\$111.66	\$4,205.81	\$58,723.00	Ventura
Joan Gurney, Rex Gurney	2206 Jonesboro Ave Simi Valley CA 93063	650-0-063-125	CA111101176	160610-CA-RA-R-10C	\$6,508.16	\$0.00	X	X	\$6,508.16	\$650.82	\$195.24	\$7,354.22	\$328,868.00	Ventura
Joan Gurney, Rex Gurney	2206 Jonesboro Ave Simi Valley CA 93063	650-0-063-125	CA111101441	160909-CA-RA-R-20C	\$2,637.34	\$0.00	X	X	\$2,637.34	\$263.73	\$79.12	\$2,980.19	\$328,868.00	Ventura
Tuan Tran	1131 Haven Ave Simi Valley CA 93065	639-0-097-035	CA111101722	160923-CA-RA-R-20C	\$2,821.10	\$0.00	X	X	\$2,821.10	\$282.11	\$84.63	\$3,187.84	\$405,446.00	Ventura
Barbara Dodd Garcia, Victor Garcia	948 Vivian Cir Newbury Park CA 91320	663-0-060-095	CA111101747	161209-CA-RA2-R-15C	\$5,991.66	\$2,995.83		X	\$2,995.83	\$299.58	\$89.87	\$3,385.28	\$856,320.00	Ventura
Heather Vincent	2355 Gloryette Ave Simi Valley CA 93063	644-0-053-025	CA111103542	180126-CA-RA3-HPR-R-05CD	\$1,911.68	\$0.00	X	X	\$1,911.68	\$191.17	\$57.35	\$2,160.20	\$590,760.00	Ventura
Sara Pyle	1043 W Iris St Oxnard CA 93033	203-0-242-245	CA111103555	180302-CA-RA-HPR-R-25CD	\$1,181.54	\$0.00	X	X	\$1,181.54	\$118.15	\$35.45	\$1,335.14	\$53,114.00	Ventura
Joel Banks	1196 Broken Spur Way Plumas Lake CA 95961	016-560-032-000	CA115108021	171215-CA-RA-HPR-R-20C	\$1,650.94	\$0.00	X	X	\$1,650.94	\$165.09	\$49.53	\$1,865.56	\$162,448.00	Yuba
Total Residential Delinquencies:									\$1,143,539.75	\$114,354.13	\$34,306.30	\$1,292,200.18		
Commercial Assessments														
Demaris Bermudez	21308 Pathfinder Rd Diamond Bar CA 91765	8285-029-001	20160506-01	200225-WR-C-R-1	\$25,635.79	\$12,817.90		X	\$12,817.89	\$1,281.79	\$384.54	\$14,484.22	\$2,634,535.00	Los Angeles
Jose Antonio Barbosa Sanchez , Rosa Gordillo Ramirez	3850 Opal St Riverside CA 92509	182-032-003	20161104-01	200225-WR-C-R-1	\$10,829.56	\$5,414.78		X	\$5,414.78	\$541.48	\$162.44	\$6,118.70	\$656,985.00	Riverside
Demaris Bermudez	901 S State St Hemet CA 92543	446-280-018	20160122-1	200225-WR-C-R-1	\$13,575.62	\$0.00	X	X	\$13,575.62	\$1,357.56	\$407.27	\$15,340.45	\$2,737,302.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-002	Truax-1	20191218-WR-TC-25	\$14,791.04	\$0.00	X	X	\$14,791.04	\$1,479.10	\$443.73	\$16,713.87	\$610,523.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-003	Truax-2	20191218-WR-TC-25	\$7,569.48	\$0.00	X	X	\$7,569.48	\$756.95	\$227.08	\$8,553.51	\$304,695.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-004	Truax-3	20191218-WR-TC-25	\$22,012.62	\$0.00	X	X	\$22,012.62	\$2,201.26	\$660.38	\$24,874.26	\$915,786.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-015	Truax-4	20191218-WR-TC-25	\$14,791.04	\$0.00	X	X	\$14,791.04	\$1,479.10	\$443.73	\$16,713.87	\$610,524.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-018	Truax-5	20191218-WR-TC-25	\$14,791.04	\$0.00	X	X	\$14,791.04	\$1,479.10	\$443.73	\$16,713.87	\$610,524.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-023	Truax-6	20191218-WR-TC-25	\$23,817.48	\$0.00	X	X	\$23,817.48	\$2,381.75	\$714.52	\$26,913.75	\$992,101.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-024	Truax-7	20191218-WR-TC-25	\$16,595.92	\$0.00	X	X	\$16,595.92	\$1,659.59	\$497.88	\$18,753.39	\$686,839.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-043-025	Truax-8	20191218-WR-TC-25	\$10,277.82	\$0.00	X	X	\$10,277.82	\$1,027.78	\$308.33	\$11,613.93	\$419,735.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-044-017	Truax-9	20191218-WR-TC-25	\$17,683.60	\$0.00	X	X	\$17,683.60	\$1,768.36	\$530.51	\$19,982.47	\$915,786.00	Riverside
Temecula Hotel Partners Old Town LLC	41934 3rd St, 41935 3rd St and 286909-28696 Front St Temecula Ca 92590	922-044-020	Truax-10	20191218-WR-TC-25	\$11,905.18	\$0.00	X	X	\$11,905.18	\$1,190.52	\$357.16	\$13,452.86	\$610,524.00	Riverside
									\$186,043.51	\$18,604.34	\$5,581.30	\$210,229.15		

[1] Counties highlighted in green have 2022 Assessed Value, other were not available so 2021 values were used.

[2] Delinquency data as of 7/08/2022.

[3] Penalty based on 10% of the delinquent assessment.

[4] Interest calculated based on 1.5% of the delinquent assessment per month from July 1, 2022 through August 31, 2022.

DRAFT



Western Riverside Council of Governments Executive Committee

Staff Report

Subject: Smart Streetlight Implementation Plan and Broadband Assessment
Contact: Daniel Soltero, Program Manager, dsoltero@wrcog.us, (951) 405-6738
Date: August 1, 2022

Requested Action(s):

1. Accept the Smart Streetlight Implementation Plan and Broadband Assessment.
2. Direct staff to implement Phase 1 of the Smart Streetlight Implementation Plan.
3. Direct staff to provide bi-monthly updates on broadband funding opportunities and convene meetings as needed to disseminate information on broadband-related funding opportunities.

Purpose:

The purpose of this item is to present the findings of the Smart Streetlight Implementation Plan and Broadband Assessment and seek direction from the Committee.

WRCOG 2022-2027 Strategic Plan Goal:

Goal #5 - Develop projects and programs that improve infrastructure and sustainable development in our subregion.

Background:

At the direction of the Executive Committee, WRCOG developed a Regional Streetlight Program that assisted 10 member agencies and a Community Service District to purchase streetlights, previously owned and operated by Southern California Edison (SCE), within their jurisdictional boundaries. Once the streetlights were purchased by the member agency, the lamps were retrofitted to light-emitting diode (LED) technology to provide more economical operations (i.e., lower maintenance costs and reduced energy use). Local control of the streetlight system provides agencies with opportunities for future revenue generation such as digital-ready networks and telecommunications and information technology strategies. In order to identify and elaborate on these new opportunities, WRCOG entered into an agreement with Michael Baker International (MBI) in February 2021 to develop a Smart Streetlights Implementation Plan and Broadband Assessment that could be applicable to all WRCOG member agencies.

Smart Streetlights Implementation Plan

One of the emerging issues related to local government is the concept of Smart Cities. Smart Cities technologies include a variety of connected sensors, systems, and technologies which are used by local governments to provide services to their residents and visitors. A common example of a Smart City technology are cameras which are used to monitor roadways and public spaces. These cameras are

often networked and connected to a central monitoring facility where local government agencies can respond to incidents as they occur in real-time.

Since the inception of the Regional Streetlight Program, staff and participating agencies recognized that purchasing streetlight systems from SCE and completing the LED streetlight conversion would allow participating agencies to leverage this infrastructure for the application of various Smart City technologies. In 2020, the Program completed the LED streetlight conversions in all participating agencies that purchased streetlights from SCE. By taking local control of the streetlight system and reducing energy consumption with the LED conversion, participating agencies now have the opportunity to integrate technologies on streetlight poles, such as internet-of-things or telecommunications devices that could potentially improve public services and quality of life, generate revenue, or achieve operational savings.

The Smart Streetlights Implementation Plan takes a holistic approach to smart streetlight integration, considering existing infrastructure and staff capabilities, technology readiness, identified community needs, and approach to procurement. The result is a strategy that is completely scalable and can be applied to the wide range of community contexts in each of WRCOG's member jurisdictions.

The approach to developing the Smart Streetlight Implementation Plan was a multi-step process. The first step of this evaluation was to conduct an Agency Readiness Survey of all WRCOG members to identify existing infrastructure as well as staff capacity and capabilities (Attachment 1). The second step was to learn from the successes and problems experienced by other agencies implementing smart streetlights or smart city technologies, which is included as the Peer Agency Review (Attachment 2). Next, the "menu" of technologies was evaluated for consideration in a WRCOG Smart Streetlight Program in the Technology Review (Attachment 3). Lastly, financial and administrative action items were identified in the Procurement Strategies document (Attachment 4), and a Request for Information (RFI) template was created to assist staff or its members in future procurement of vendor hardware and services (Attachment 5). The findings of each of these tasks have been compiled into the Plan's Implementation Strategy (Attachment 6).

By taking information from previous tasks completed to date, MBI developed the implementation strategies document to summarize the action items that WRCOG and/or its members will need to accomplish to build a successful smart streetlight or smart city program. The implementation strategy is presented in three phases: 1) Assess, 2) Test, and 3) Expand. It is anticipated that this will be an iterative process, with phases revisited as the program matures.

During the assessment phase, the first step that should occur is a needs assessment from each of WRCOG's member agencies. It is likely that needs will vary significantly across member agencies, and even within their communities. It is important to identify overlapping interests and initiatives between agencies and they should be leveraged to the extent possible, as partnerships can reduce the financial burden on any one agency and increase the economies of scale pricing for proposed technologies. A needs assessment can also inform the scale of a smart city program, such that certain applications can be addressed at a regional level, the agency level, or at a site-specific level. This assessment should be completed with input from agency staff, stakeholder engagement, and public input.

Once the needs are identified by member agency or as a whole throughout the subregion, the second step is to complete an agency assessment. The agency assessment can build upon the previously completed Agency Readiness Survey in order to closely identify the existing capabilities and gaps that

should be addressed as the program progresses. The American Association of State Highway and Transportation Officials (AASHTO) capability maturity model assessment for Transportation Systems Management and Operations (TSM&O) can be loosely interpreted for application to any technology program, including a smart streetlight program, and can be used by member agencies for a self-assessment.

The third step in the assessment phase is a technology assessment, which can be completed by issuing a Request for Information (RFI) to solicit responses from available vendors. A template RFI document has been prepared as part of the development of this plan, and can be tailored to specific agencies and technologies of interests based on the findings of the needs and agency assessment. From the technology assessment, a final list of preferred technologies and associated vendors can be developed to inform a pilot study.

A recurring best practice from the Peer Agency Review is to conduct a Test phase through a pilot study prior to full scale deployment of a smart streetlight or smart city technologies. The testing phase provides the opportunity to test the technologies and recognize their real world implications at a minimal investment, as well as conduct a cost / benefit analysis. To streamline the testing phase, and if it is the desire of its member agencies, WRCOG may have an opportunity to administer smart streetlight and smart city pilot projects in partnership with members of the Regional Streetlight Program to test technologies that are of interest to all member agencies. Similar to the Streetlight Program's Hemet LED Demonstration Area, a WRCOG-led pilot study will ensure consistency between deployments and a continual progression of knowledge, skills, and abilities that can be shared with all member agencies. Additionally, WRCOG could potentially develop smart streetlight or smart city technology policies and guidelines as a result of a pilot study, which could be emulated after the WRCOG LightSuite; a modern lighting regulations document that was developed pursuant to the Hemet LED Streetlight Demonstration Area.

Once the test phase has determined the smart streetlight or smart city technologies to be successful and a worthwhile investment, the last phase is to expand the project for full scale deployment. This will include the member agencies examining available internal funding to adopt the most successful piloted technology, or technology of the member agencies' interest. Additionally, the Smart Streetlight Implementation Plan includes a procurement strategies document which summarizes a few procurement types including outright equipment purchase, public-private partnerships, and grant funding.

The Smart Streetlights Implementation Plan and its strategies should be approached as an iterative process, with phases revisited as the program matures and new funding opportunities merge. This document can be used by WRCOG members to inform future decision making on whether WRCOG or its member agencies should pursue a smart streetlight and/or smart city program.

Broadband Assessment

Broadband access is one of the key requirements to creating smart cities, and within Riverside County there are several previous and ongoing efforts to identify broadband gaps, review development opportunities, and/or facilitate broadband implementation. At the request of the City of Jurupa Valley, WRCOG included a Broadband Assessment in the Smart Streetlights Implementation Plan which will assess existing regional broadband efforts to inform WRCOG and its members on the potential for additional efforts to encourage broadband development in the Western Riverside County subregion.

The Broadband Assessment included online research and phone interviews with staff from the County of Riverside's RIVCO Connect Program, the IERBC for its various broadband initiatives, the Cities of Loma Linda and Rancho Cucamonga, and the South Bay Cities Council of Governments (SBCCOG) for their municipal broadband networks. The Broadband Assessment provides details and summaries on each of the aforementioned entities as well as additional known municipal broadband efforts (Attachment 7).

The County of Riverside's Broadband Master Plan, RIVCO Connect, is an initiative to facilitate providing high-speed internet connectivity to all residents and businesses throughout the County. In 2017, the County released a Request for Participation to solicit broadband providers to deploy broadband networks and provide service at affordable rates; however, this resulted in no award due to misalignment with the scope of services, including asking local governments to share the construction costs with the internet service providers (ISP). The County of Riverside continues to support broadband goals and objectives, as well as seek funds to support broadband deployment and billing assistance programs that assist low income families in the subregion.

IERBC is a non-profit, 501(c)(3) that convenes a variety of stakeholders to address broadband access, planning, affordability, infrastructure requirements and deployment, and broadband gaps within Riverside and San Bernardino Counties. To date, the IERBC has secured \$55 million in Broadband Infrastructure and Adoption Grants through the California Advanced Services Fund (CASF) to deploy broadband networks in unserved communities throughout Riverside and San Bernardino Counties. Going forward, the IERBC will continue to identify unserved areas, work with the ISPs to understand the barriers to broadband access and deployment, coordinate with local governments to address those barriers, and ultimately funnel broadband infrastructure deployment dollars to the Inland Empire.

The City of Loma Linda currently operates a municipal fiber-optic broadband network, known as the Connected Communities Program (LLCCP). The City also modified its building regulations to ensure that new development or major building modifications can accommodate current and future broadband connectivity needs. To date, the LLCCP has completed the construction of its network operations center and the first phase of fiber infrastructure throughout the City. A key lesson learned from the City of Loma Linda is to build telecommunications / fiber networks with redundancy in mind, as network outages can have widespread negative impacts.

Furthermore, the City of Rancho Cucamonga was interviewed for its Rancho Fiber municipal broadband service. The City has been implementing its "dig smart" policy for a few decades by requiring installation of conduit and/or fiber during construction projects. In 2017, the City adopted a Fiber Optic Master Plan, released a Request for Proposal, and awarded it to Onward, formerly known as Inyo Networks. A public-private partnership was formed to provide retail internet and voiceover IP phone service, and to operate the City's municipal broadband program. This example of a municipal broadband program emphasizes the importance of dig once or dig smart policies, as it can lead to deployment of fiber or broadband infrastructure that can eventually benefit the member agencies.

SBCCOG deployed and administers the South Bay Fiber Network (SBFN), a fiber optic network that connects at least one facility in each of its 15 member Cities. In 2017, the South Bay Workforce Investment Board provided seed funding to develop the South Bay Cities Fiber Optic Master Plan to determine the feasibility of deploying a regional broadband network. The Plan found that the public agencies were paying high prices for the service provided, and that deploying a dedicated fiber network could provide participating agencies with up to 60 to 70 times more bandwidth and network speeds at

about half the average cost of broadband service per City. In collaboration with the Los Angeles County Board of Supervisors and L.A. Metro, Measure M Transportation funds were used to implement the project. Since August of 2020, the SBFN provides 15 cities and 37 locations with 1 Gigabit-per-second network speeds at a lower cost.

Conclusion

The conversion to LED streetlights throughout the WRCOG subregion offers an opportunity for members to lay the groundwork for future deployment of a smart city. Through development of the Smart Streetlight Implementation Plan, staff gained insights and learned best practices for developing and implementing a smart city or smart streetlights project. The strategy, or next steps, for implementation is presented in three phases: 1) Assess, 2) Test, and 3) Expand. To implement the Plan, the first step would be to conduct the needs and agency assessments to help gain agency information and interests, as well as inform and frame future decision making on a potential smart streetlight and/or smart city program. Thereafter, the Plan would enter the Test phase, which includes a technology assessment to solicit technology information and compatibility, followed by a potential pilot project to test the real-world operation of the proposed device. The last phase in the Plan is to expand the successful pilot projects to full scale deployment, including various administrative activities such as releasing a public solicitation for the equipment and identifying funding sources to implement the project. The WRCOG Smart Streetlights Implementation Plan and its implementation strategy was developed based on the findings of extensive research and outreach efforts, and should be approached as an iterative process to be revisited and tailored to the participating member agencies.

Access to broadband is a key requirement to creating smart cities. At the request of one of its member agencies, WRCOG completed a Broadband Assessment which assessed existing broadband efforts in the subregion to identify opportunities for WRCOG to promote broadband deployment in Western Riverside County. Following the completion of the Broadband Assessment, staff have identified potential activities that WRCOG can undertake to support broadband development and implementation in the Western Riverside County subregion. First, staff believe WRCOG can share information on broadband grant opportunities that are currently available and those that may arise, specifically those associated with Senate Bill 156, the Governor's Executive Order N-73-20, and the Federal Communications Commission Affordable Connectivity Program. Second, staff believe WRCOG can convene meetings with various local governments and stakeholders to help our region best coordinate its broadband efforts, which is particularly important when seeking potential broadband grant funding.

Prior Action(s):

July 21, 2022: The Technical Advisory Committee recommended that the Executive Committee, 1) accept the Smart Streetlight Implementation Plan and Broadband Assessment; 2) direct staff to implement Phase 1 of the Smart Streetlight Implementation Plan; and 3) direct staff to provide bi-monthly updates on broadband funding opportunities and convene as-needed meetings to disseminate information on broadband-related funding opportunities.

June 9, 2022: The Public Works Committee recommended that the Executive Committee 1) accept the Smart Streetlight Implementation Plan and Broadband Assessment; 2) direct staff to implement Phase 1 of the Smart Streetlight Implementation Plan; and 3) direct staff to provide bi-monthly updates on broadband funding opportunities and convene as-needed meetings to disseminate information on broadband-related funding opportunities.

Broadband Assessment:

February 17, 2022: The Technical Advisory Committee received and filed.

February 10, 2022: The Public Works Committee received and filed.

December 8, 2021: The Administration & Finance Committee received and filed.

Smart Streetlight Implementation Plan:

September 16, 2021: The Technical Advisory Committee received and filed.

September 1, 2021: The Administration & Finance Committee received and filed.

August 12, 2021: The Public Works Committee received and filed.

Fiscal Impact:

All costs associated with development of the Smart Streetlights Implementation Plan and accepting those documents as part of the Requested Action #1 are included in the Regional Streetlight Program's budget.

With regard to Requested Action #2, the Needs Assessment and Agency Assessment can be completed by staff, which would be supported by the existing staff time allocation in the Regional Streetlight Program's budget in the 2022/2023 Fiscal Year.

With regards to Requested Action #3, staff time and meeting support is already included in the Regional Streetlight Program's budget.

All staff and consultant expenses related to this item are included in the General Fund (Fund 110) under the Energy and Environment Department expenses related to the Streetlight Program.

Attachment(s):

[Attachment 1 - WRCOG Smart Streetlights - Agency Readiness Survey](#)

[Attachment 2 - WRCOG Smart Streetlights - Peer Agency Review](#)

[Attachment 3 - WRCOG Smart Streetlights - Technology Application Review](#)

[Attachment 4 - WRCOG Smart Streetlights - Procurement Strategies](#)

[Attachment 5 - WRCOG Smart Streetlights - Sample Request for Information \(RFI\)](#)

[Attachment 6 - WRCOG Smart Streetlights - Implementation Strategy](#)

[Attachment 7 - WRCOG Smart Streetlights - Broadband Assessment](#)

Attachment

WRCOG Smart Streetlights - Agency Readiness Survey Results

WRCOG Smart Streetlights - Agency Readiness Survey Results

Date Received:	Email Response		4/22/21	4/9/21	4/6/21	4/5/21	4/5/21	4/5/21	4/2/21	3/25/21	3/25/21	3/25/21
What jurisdiction or municipality do you work for?	City of Eastvale	City of Wildomar	City of Lake Elsinore	City of Perris	City of Calimesa	City of Banning	City of San Jacinto	City of Riverside	City of Menifee	Jurupa Community Services District	Temecula	City of Murrieta
How many streetlights are currently within your jurisdiction/municipality?	4201	1405 (soon to be 1411) City-owned streetlights; 73 signal safety lights; approx. 100-200 other non-City streetlights (SCE owned).	3500	4,943	340		3052	Approximately 30,000	Refer to Daniel	approx 2000	approx 7,400	6500
Who owns the streetlights in your jurisdiction?	Combination of City of Eastvale and SCE	See above	City	City of Perris	SCE	City of Banning	City	Riverside Public Utilities	City of Menifee	Mostly us; some SCE	City	City. SCE owns lights in certain HOA areas.
How many streetlights have been converted to LED?	Most	Most	All	Most	Most	Most	Most	Some	Most	Most	All	Most
Are additional streetlights planned for LED conversion?	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No
Does your jurisdiction/municipality provide public wi-fi in any capacity?	No	Yes	No	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes
Where does your jurisdiction/municipality provide public wi-fi?	My jurisdiction does not provide public wi-fi	City/County/Municipality Buildings	City/County/Municipal buildings	My jurisdiction/municipality does not provide public wi-fi	City/County/Municipal buildings	City/County/Municipal buildings	City/County/Municipal buildings	Library	City/County/Municipal buildings	My jurisdiction/municipality does not provide public wi-fi	City/County/Municipal buildings	City/County/Municipal buildings

How many traffic signals are within your jurisdiction/municipality?	58	17 City owned/maintained signals; two additional signals are currently under construction and are expected to be complete by end of 2021/beginning of 2022, bringing the total to 19; One signal is on the City border with the City of Murrieta but is maintained by Wildomar; 8 County/Lake Elsinore maintained signals: these signals are on the City border with either the County or Lake Elsinore and serve more than one jurisdiction; 4 Caltrans owned/maintained signals.	60	94	5 intersections, approximately 125 signal heads	18	172	Approximately 400	More than 80, but I do not have the exact count - see Daniel Soltero	N/A	127	We have 100 signalized intersections
Who owns and maintains the traffic signals in your jurisdiction/municipality?	City owns the traffic signals, and they are maintained through contract with Econolite Systems.	See above	City	City, County, Shared Municipalities	City owned	Banning, Beaumont and Caltrans	Riverside County Transportation	The Public Works Department	City of Menifee	N/A	City	City
Are there communications systems tying the signals together?	Yes	No	No	I'm not sure	No	No	No	Yes	Yes	I'm not sure	Yes	Yes

What kind of "Hard" IT/networking assets does your jurisdiction/municipality own and maintain (e.g., Fiber optics backbone, server or cloud processing, etc.)?	Some fiber, some copper, some wireless. No central server	No response	Server or cloud processing	Server or cloud processing		Server or cloud processing	Server or cloud processing	Fiber optics backbone	Server or cloud processing, Wireless (Microwave) and limited Fiber backbone	N/A	Fiber optics backbone	Fiber optics backbone
How does your city maintain (within your jurisdictional limits; please include staff numbers committed to streetlights?)	Maintained through an umbrella contract with WRCOG, Siemens provided maintenance services for streetlights.	Contract with Siemens/WRCOG for maintenance. Public Works Inspector may coordinate with Siemens staff during reinstallations of knocked-down streetlights.	Out source	The maintenance and repair of City owned streetlights is contracted out to a third party.	SCE maintained	City of Banning Electric Department. There isn't a set amount of linemen that are dedicated to street light maintenance.	Contractor	15	City Staff for Streetlight administrative duties: • Office Specialist • PW Analyst • PW Supervisor • PW Manager Streetlight Maintenance and Repairs: City has a maintenance contract with WRCOG and SIEMENS. SIEMENS is the contractor assigned to maintenance and repairs.	Contract with external vendor	City maintains with 2 Traffic Signal Technicians, contractors on-call for major maintenance requirements	We contract with Siemens for maintenance services
How does your city maintain (within your jurisdictional limits; please include staff numbers committed to) traffic signals?	Maintained through contract with Econolite Systems.	Contract with Siemens for maintenance. Public Works Inspector may coordinate specific signal issues with Siemens staff, as necessary.	Out Source	The maintenance and repair of City owned traffic signals is contracted out to a third party.	Contract with Siemens	Contractor	Riverside County Transportation	5	City contracts with the County of Riverside TLMA	N/A	same as above	We contract with County of Riverside for most maintenance. However, we also have one staff member responsible for coordinating maintenance, programming traffic signals, troubleshooting issues at intersection cabinets.

How does your city maintain (within your jurisdictional limits; please include staff numbers committed to) City/Public IT/networking?	Maintained through contract with Econolite Systems.	Contract with Interwest Consulting Group for City IT Services. Two City employees coordinate with IT Services as necessary.	City Staff	5		In house staff (3) and contractors.	City (2)	5	Maintenance/support duties are shared among five different people.	N/A	same as above	Internal IT staff. 3
How does your city maintain (within your jurisdictional limits; please include staff numbers committed to) wi-fi?	City does not have public wi-fi	Contract with Interwest Consulting Group for City IT Services, including wi-fi support at City Hall. Two City employees coordinate with IT Services as necessary.	City staff	N/A		In house staff (3)	0	1	Maintenance/support duties are shared among five different people.	N/A	City IT Department	Internal IT staff. 3
Do you have any policies or ordinances related to collection of data from publicly owned IT/networking assets?	No	No - I don't believe so, but not 100% sure	No	Yes		No	No	No	Yes		Yes	unknown

Attachment

WRCOG Smart Streetlights –
Peer Agency Review

May 31, 2022

Daniel Soltero, Program Manager
Western Riverside Council of Governments
3390 University Ave, Suite 200
Riverside, CA 92501

Subject: WRCOG Smart Streetlights: Peer Agency Review

Michael Baker is assisting the Western Riverside Council of Governments (WRCOG) in developing a Smart Streetlight Implementation Plan. As part of this effort, Michael Baker has reviewed five peer agencies that have applied smart streetlight technologies to learn from their successes and problems, which will inform WRCOG's development of this plan and potential implementation of a smart streetlight or smart city program. The review included a combination of online research, interviews with key staff, and first-hand knowledge from staff involvement on Smart City plans, where applicable. This technical memorandum summarizes the peer agency review and resulting key takeaways.

Introduction

At the direction of the Executive Committee, WRCOG developed a Regional Streetlight Program that assisted 10 member agencies and a Community Service District to purchase nearly all the streetlights within their jurisdictional boundaries which were previously owned and operated by Southern California Edison (SCE). Between 2019 and 2020, the Program converted over 53,000 streetlights across 11 local jurisdictions to LED fixtures. The LED fixtures use substantially less power, resulting in a 70% reduction in energy consumption across the participating agencies. The upgrade also substantially reduced light pollution, benefiting the community as well as the Palomar Observatory in San Diego County. The cost savings and reduced power draw present an opportunity to add smart city architecture to the streetlights. The Smart Streetlight Implementation Plan will assess which types of technologies would provide the most value to the WRCOG communities. The first step of this evaluation was to learn from the successes and problems experienced by other agencies implementing smart streetlights.

Approach

Michael Baker conducted a review of peer agencies that have established programs or partnered with vendors resulting in smart streetlight implementation. The reviews first consisted of literature reviews and online research. The research covered the type of communications equipment installed on existing or new streetlight poles, additional in-ground infrastructure required for implementation (i.e., fiber or communications), agreements or contracting arrangements with service providers, types of data collected or reported, and what successes or problems have been reported.

After performing online research, Michael Baker and WRCOG staff conducted one-on-one interviews with key staff from each of the peer agencies to get further insight into program implementation. Questions were developed to identify lessons learned, business models, contract solicitation approaches, and technology prioritization for each peer agency's program. The selected peer agencies and interview questions were developed in consultation with WRCOG staff.

Peer Agency Reviews

Los Angeles, CA

The City of Los Angeles had the widest variety of Smart Streetlight uses of the peer agencies reviewed, including solar streetlights, smart gas meters, electric vehicle (EV) charging stations, smart poles (poles with built-in small cell technology), 5G co-location, air quality sensors, safety cameras (at select locations), pedestrian counters, motion sensors, seismic sensors, USB charging, and digital banners.

City staff completed a public survey with various communities which identified public Wi-Fi and air quality monitoring as priorities when implementing smart city technologies. While Wi-Fi was a community priority, the tested technology did not meet the requirements. Air quality sensors have been installed in select communities and have been limited to sensors that communicate with cellular technology. Data collection and analysis is conducted by a different department at the City.

The City has installed nearly 400 electric vehicle (EV) charging stations on streetlights systems that operate on 240v. Staff were trained to install and maintain the EV charging stations across the city. Installing 7kW EV chargers required additional infrastructure upgrades, including a new transformer, conductor, and fusing. Consumers pay a nominal fee to utilize the EV chargers.

Furthermore, the City has implemented Smart Nodes (Remote Monitoring Units (RMUs)) and uses third-party vendor-proprietary platforms such that each technology has a different control platform. Most technology is being applied at small scale as a beta-test. The systems that generate revenue have not been found to cover the cost of the program. While 5G co-location is the most lucrative, it requires substantial coordination effort between the vendors and service providers. Finally, the community has expressed concerns about invasion of privacy related to the pedestrian counters and cameras.

Lessons Learned

- Business model is uncertain. How can the program be implemented so the system pays for itself?
- Identify program parameters ahead of time. What problem are you trying to solve? What is your existing inventory? What new skills will your maintenance workforce need for these systems?

San Diego, CA

The City of San Diego has implemented smart sensors that collect data such as available parking spaces, vehicle counts, pedestrian counts, bicycle counts, temperature, humidity, and atmospheric pressure. The City uses the CityIQ online platform, which allows staff to aggregate and organize data collected various sensors, as well as provide public access to data. In implementation, the City has not realized the cost savings that were anticipated prior to deployment. Finally, the community has expressed concerns related to privacy.

Lessons Learned

- Beta test ahead of large-scale installation
- Get public buy-in if features might be controversial

Las Vegas, NV

The City of Las Vegas maintains over 50,000 streetlights and has implemented separate pilot programs with Ubiqquia and with Philips. The pilot systems include remote control, power usage reporting, dimming and light scheduling. During the planning phase staff identified that the streetlight systems are photocontrolled at the point-of-service, as opposed to each individual streetlight, which only supplies power to the streetlight circuit from dusk to dawn. As a result of this condition, the City had to complete circuit upgrades to provide continuous power to the circuit allowing the sensors to operate without interruption.

Rather than fiber, the Las Vegas pilot systems use AT&T's LTE cellular network. The City has reported that it intends to continue to work with AT&T and Ubiqquia to install more sensors to collect temperature, ozone and particulate levels, traffic and construction, air quality, etc. The City also reported that it plans to expand the 5G WiFi network especially around the new NFL stadium. The streetlight upgrades have resulted in cost savings for the City.

Lessons Learned

- Streetlights are only on at night, meaning all associated technologies can only function at night unless circuit upgrades are completed.
- A user-needs assessment would identify the most important systems to prioritize

Chicago, IL

The City of Chicago is converting streetlights to LED fixtures that allow for remote monitoring and notifications of light failures. The City has reported cost savings in operations, and it also benefitted from ComEd energy-efficiency incentive rebates. Chicago city staff were not available for an interview, and therefore the review was limited to information that was available online.

Lessons Learned

- Successful public engagement program. Regular community meetings to gauge feedback, and no concerns have been reported. Upgrades are mapped on a publicly available website to allow the community to track installations.

Kansas City, MO

The City of Kansas City has implemented Sensity technology for streetlights along the streetcar line and has implemented separate pilot programs with Ubiqquia and with Philips. The systems include alerts of streetcar track blockages, cameras, smart lighting, Wi-Fi, electric vehicle charging stations, and sensors that record data pertaining to traffic, parking, noise, crowds, air quality, and weather. The data collected by the streetlights are accessible to the public via an online portal. The City has reported reduced energy and maintenance costs from the streetlight upgrades.

Lessons Learned

- Incorporated smart technologies on a larger infrastructure project (streetcars), which made the perceived cost smaller in comparison to the overall higher-dollar construction project
- A city-needs analysis would have improved project usefulness and outcomes.

Key Takeaways

Although these agencies differ from WRCOG, their experiences will help inform how WRCOG and/or its member agencies can successfully implement a Smart Streetlights program. Key takeaways that WRCOG staff should address in its Smart Streetlight Implementation Plan are as follows:

- Identify program parameters ahead of time. Agencies need to know what problem they are trying to solve as well as their system capabilities.
- Consider the agencies' current traffic signal and IT staff capabilities as well as the responsibilities for the systems. Agencies should consider what new skills maintenance workforce will need for these systems.
- Start with a pilot for testing the technology and data quality. As part of the pilot program consider different vendors and technologies to understand the limits and capabilities of different systems.
- Understand that the current business model is uncertain. For most cities, the smart applications have been an expense with little or no return revenue for the City. Agencies should consider how programs can be implemented so they pay for themselves or recognize the expense to solve an identified need.
- Understand who owns the data for the implemented systems. When developing contracting documents, specify who owns the data and what data will be sent and maintained by the agency. It is also beneficial to determine if the agency can handle the raw data for analysis or if dashboards are the preferred method of monitoring system performance.
- Public transparency in the process is essential. Agencies should understand there is a potential for community concerns about privacy. Outreach should clearly outline what technology is being implemented, what data are being collected and what data will be maintained. Decision maker and community buy-in is highly recommended if features may be controversial.

Supplemental Agency Review

Columbus, OH

The City of Columbus recently solicited proposals for the implementation of a Columbus Smart Street Lighting System (CSSLS). This system will include features such as centralized remote monitoring and control (two-way communication) of individual streetlights for outages, remote changes in time of operation, and dimming of fixtures by time of day or sensors. The CSSLS will leverage the existing fiber optic communication network for the backhaul system. The City intends to operate the CSSLS in an existing management center and the system may accommodate the incorporation of other applications, such as traffic counters, gunshot detection, environmental sensors, etc. This procurement will convert about 58,000 luminaires to LED and follows a pilot project that will convert 2,559 luminaries.

Summary & Conclusions

The review of peer agencies identified several lessons learned that will benefit WRCOG and its member agencies with a potential Smart Streetlight program implementation. WRCOG staff will need to first identify the priorities of the program to select the best technology to implement. A pilot program will ensure that the technology will meet staff needs and will validate the cost estimates provided by technology vendors to inform the actual cost of full roll-out. WRCOG should also consult with its

members to determine if deployed systems will be managed by individual members or centrally through WRCOG, as a central management approach with a dedicated staff could provide the attention and monitoring needed to fully realize the benefits from the program. Finally, WRCOG should also prepare a public outreach plan to help the affected communities understand what technology is being implemented and how their privacy will be protected. These measures will ensure a successful Smart Streetlight Implementation Plan.

If you have any questions pertaining to the findings summarized in this memo, please call Dawn at (760) 603-6266.

Sincerely,

Dawn Wilson,
Department Manager
Transportation Planning

Attachment

WRCOG Smart Streetlights – Technology Application Review

May 31, 2022

Daniel Soltero, Program Manager
Western Riverside Council of Governments
3390 University Ave, Suite 200
Riverside, CA 92501

Subject: WRCOG Smart Streetlights: Technology Application Review

Michael Baker is assisting the Western Riverside Council of Governments (WRCOG) in developing a Smart Streetlight Implementation Plan. As part of this effort, Michael Baker has reviewed potential Smart Streetlight technologies based on applicability categories and level of readiness. This technical memorandum summarizes the application review for WRCOG's consideration.

Introduction

At the direction of the Executive Committee, WRCOG developed a Regional Streetlight Program that assisted 10 member agencies and a Community Service District to purchase nearly all the streetlights within their jurisdictional boundaries which were previously owned and operated by Southern California Edison (SCE). Between 2019 and 2020, the Program converted over 53,000 streetlights across 11 local jurisdictions to LED fixtures. The LED fixtures use substantially less power, resulting in a 70% reduction in energy consumption across the participating agencies. The upgrade also substantially reduced light pollution, benefiting the community as well as the Palomar Observatory in San Diego County. The cost savings and reduced power draw present an opportunity to add smart city architecture to the streetlights. The Smart Streetlight Implementation Plan will assess which types of technologies would provide the most value to the WRCOG member agencies. The first step of this evaluation was to learn from the successes and problems experienced by other agencies implementing smart streetlights, as documented in the *WRCOG Smart Streetlights: Peer Agency Review* technical memorandum, dated June 8, 2021. The second step of the evaluation was to evaluate which technologies could be considered for the WRCOG Smart Streetlight Implementation Plan.

Approach

Michael Baker conducted a review of technology applications to be considered for the WRCOG Smart Streetlight Implementation Plan. Each application is summarized in cut-sheet format, including a general description, technology readiness, general assessments of the potential need for hardware (including, but not limited to, sensors, mounting equipment, and communication equipment), support infrastructure required, backhaul communications requirement (e.g., wireless, cellular, or fiber-optic), back-end systems and monitoring, and maintainability and maintenance requirements, including general descriptions of additional hardware, back-end, and support services needed. The applications are grouped into general categories of technology applicability: Environmental and Sustainability, Economics, Mobility, Public Safety, and Connectivity. Some applications fall into multiple categories, as noted in the detailed cut sheet. Each of these categories is described further below.

Environmental and Sustainability

Applications in the Environmental and Sustainability category could include tracking air quality to provide local planners, researchers, and the general public with high-quality, local environmental data. Water detectors could be deployed to identify flood conditions or optimize water use for irrigation, and road temperature detectors could be used to determine when roadway treatment is needed for snow or ice conditions. Smart streetlights may also provide electric vehicle charging to support battery electric or plug-in hybrid electric vehicles, or dimmable nodes to reduce power consumption when lights are not needed. A combination of sensors could also be applied for wildfire detection to alert or track wildfire events.

Economics

Applications in the Economics category include technologies that can generate revenue, such as electric vehicle charging for a fee, or a smart banner that can feature ad space to be sold to local businesses. Small cell technology to support 5G cellular networks can be leased or sold to providers, or dimmable nodes would reduce power consumption and associated energy costs, with the streetlight increasing illuminance when a vehicle or pedestrian is detected.

Mobility

Applications in the Mobility category could include smart cameras or other detectors that can count vehicles, bicycles, or pedestrians or can identify collisions and near misses. These detectors could be implemented in combination with automated lighting, or they could be used to measure parking turnover or to track and report real-time parking availability.

Public Safety

Applications in the Public Safety category could include surveillance cameras that may be used to monitor public parks or roadways for criminal activity, or it may include dimmable nodes to provide additional light only when road users are detected. They may also include a combination of sensors used for wildfire detection or gunshot detection, and alerts could be automatically sent to relevant emergency responders. Water detection could be used to alert the jurisdiction staff or the public to dangerous flooding events, or road temperature sensors could identify dangerous snow or ice conditions.

Connectivity

Applications in the Connectivity category include communication to jurisdiction maintenance departments or internet connectivity for the public. For example, asset management nodes would help the streetlight program management predict utility pole or transformer failure to make repairs before an outage. Small cell technology and Wi-Fi hotspots could also be provided for public internet access.

Environmental and Sustainability

Category: Environmental and Sustainability		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2 style="margin: 0;">Air Quality Sensor</h2>		
Description: Air quality detection and tracking is becoming a growing need as communities are faced with concerns about pollution and particulates. Air quality sensors can measure temperature, humidity, a variety of gas pollutants (including ozone, nitrogen oxide, and carbon dioxide), and a variety of particulate matter. An air quality sensor could be used to inform the community about dangerous pollution events. Some individuals are more likely to have negative reactions to air pollutants, and they could take appropriate protection measures according to local air quality levels.		Applications: Data collection for research Pollution tracking Wildfire detection (in combination with other technology) Vendors: Ubicquia CIMCON Siemens Mobility ENE.HUB
Benefits: On-demand monitoring/reporting?	Hardware: Straps onto pole Plug-in for power	Communications: Wireless
Monitoring: Temperature Humidity Ozone Nitrogen Dioxide Particulate Matter < 2.5 µm <i>Vary by vendor:</i> Sulfur Dioxide Nitrogen Monoxide Carbon Monoxide Particulate Matter < 1.0 µm Particulate Matter < 10.0 µm Noise level (decibels)	Maintenance: Easy to detach/replace Over-the-air updates	 <i>Source: Ubicquia Information Brief</i>
Additional Categories: <input checked="" type="checkbox"/> Economics		

Category: Environmental and Sustainability		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2 style="margin: 0;">Dimming Light Control</h2>		
Description: Dimmable streetlights can be used to provide only as much light as needed, based on schedule, ambient conditions and road user needs. Because the light will not be operating at full power from dusk to dawn, the streetlight will use less energy. These dimmable nodes can be based on complex schedules, or can be installed in combination with other sensors based on the control desired, whether it be ambient light, weather conditions, presence of a vehicle or pedestrian, traffic volumes, or a noise trigger.		Applications: Streetlight adjusts based on ambient light Streetlight activates/brightens when road user is detected Vendors: Ubicquia CIMCON Siemens Mobility ENE.HUB LightGrid by GE Current Signify (formerly Phillips Lighting) Pangea by Visionaire Lighting Holophane
Benefits: Reduced operating costs Reduced light pollution	Hardware: Attaches directly to luminaire	Communications: Wireless
Monitoring: Power usage Quality of line and load GPS <i>Varies by product:</i> Sensor trigger Tilt/vibration	Maintenance: Over-the-air updates	 <i>Source: Ubicquia Product Catalogue</i>
Additional Categories: <ul style="list-style-type: none"> ✓ Public Safety ✓ Connectivity 		

Category: Environmental and Sustainability		Readiness: Yellow Light/Some Pilots <input type="radio"/> Tested <input checked="" type="radio"/> Pilots <input type="radio"/> Proven
<h2>Water Detector</h2>		
Description: Water detectors can be used in combination with streetlights to identify flood events or assist with irrigation needs along roadways. Whether monitoring roadways that commonly flood or identifying build ups in catch basins before flooding occurs, flood detection can help jurisdictions react to dangerous water levels as soon as possible. In combination with an irrigation system, a water detector can identify real-time water data such that landscaping is irrigated to exact needed levels, improving efficiency and decreases water consumption.		Applications: Flood detection Irrigation Vendors: CIMCON/Senix ENE.HUB
Benefits: Flood alerts Catch basin clog alerts Efficient irrigation	Hardware: Sonic sensor installed on streetlight or in nearby catch basins	Communications: Wireless
Monitoring: Water level Water volume 50-foot detection range 10-mile communication range	Maintenance: Easy to detach/replace	 <i>Source:</i> https://www.senix.com/news/sensors-provide-iowa-flood-warnings/
Additional Categories: <input checked="" type="checkbox"/> Public Safety		

Category: Environmental and Sustainability		Readiness: Yellow Light/Some Pilots <input type="radio"/> Tested <input checked="" type="radio"/> Pilots <input type="radio"/> Proven
<h2>Road Temperature Detector</h2>		
Description: For roads affected by snow and ice conditions, monitoring road temperature can inform when salt or other chemicals should be applied. Even installed only at high risk areas, road temperature sensors would inform jurisdictions exactly when roadway treatment is needed to improve roadway safety.		Applications: Winter road maintenance
		Vendors: CIMCON
Benefits: Reduced road maintenance cost Improved road safety	Hardware: Mounts onto pole	Communications: Wired or wireless
Monitoring: Road temperature Air temperature	Maintenance: Easy to detach/replace	 <p>Source: CIMCON Road Temperature Monitoring Technical Data Sheet</p>
Additional Categories: <input checked="" type="checkbox"/> Public Safety		

Economics

Category: Economics		Readiness: Yellow Light/Some Pilots <input type="radio"/> Tested <input checked="" type="radio"/> Pilots <input type="radio"/> Proven
<h2>Electric Vehicle Charging</h2>		
Description: While electric vehicles are becoming more popular, they require charging infrastructure to allow them to be useful. Because charging an electric vehicle with a standard power source can be slower than filling up a gas tank, charging most conveniently occurs when the car is parked. Streetlights near on- or off-street public parking can offer electric vehicle charging, contributing to electric vehicle infrastructure at lower cost than standalone charging stations. If electric vehicle charging is offered for a fee, this provides a revenue stream back to the streetlight operator.		Applications: Pay-for-charge in parking spots located near streetlights Vendors: FLO LilyPad EV ENE.HUB
Benefits: Reduced vehicle emissions Potential revenue stream	Hardware: Level 2 charging stations require a 240V AC power source Mounts onto pole	Communications: Wireless
Monitoring: Charge time Electricity provided High-demand areas for electric vehicle charging	Maintenance: Modular elements allow for easy replacement of components	 <p>Source: Case Study: City of Los Angeles, FLO</p>
Additional Categories: <input checked="" type="checkbox"/> Environmental and Sustainability		

Category: Economics		Readiness: Yellow Light/Some Pilots <input type="radio"/> Tested <input checked="" type="radio"/> Pilots <input type="radio"/> Proven
<h2>Smart Banners</h2>		
Description: Dynamic, digital signage on light poles can be used to alert drivers or pedestrians traffic issues, emergencies, or other public information. Schedule slots could also be sold to private businesses for advertising purposes.		Applications: Traffic notifications Other public information Private advertisements
		Vendors: YuChip Keewin ENE.HUB
Benefits: Public communication Potential revenue stream	Hardware: Digital display	Communications: Wireless
Monitoring: Display time Image/video progression	Maintenance: Easy to detach/replace Over-the-air updates	 <p>Source: keewindisplay.com/smartstreetlights</p>
Additional Categories: <input checked="" type="checkbox"/> Connectivity		

Mobility

Category: Mobility		Readiness: Yellow Light/Some Pilots <input type="radio"/> Tested <input checked="" type="radio"/> Pilots <input type="radio"/> Proven
<h2>Smart Cameras</h2>		
Description: Cameras mounted on a street poles can be used for security and surveillance. When paired with video analytics, cameras can become vehicle counters, pedestrian counters, curb space monitors, and collision or near-miss detectors. Cameras typically have a wide field of view and can be remotely panned, pivoted, and zoomed.		Applications: Surveillance Vehicle counts Pedestrian/bicyclist counts Curb space/parking data and enforcement Collision/near-miss data Wildfire detection (in combination with other technology)
Benefits: On-demand traffic monitoring Congestion management		Vendors: Ubicquia CIMCON Siemens Mobility ENE.HUB
Hardware: Mounts onto pole Connects to smart processor mounted to luminaire (for analytics)	Communications: Camera is hard-wired to video processor, video processor communicates wirelessly	 <p>Source: CIMCON Vehicle Analytics (Camera) Technical Data Sheet</p>
Monitoring: Video recording	Maintenance: Easy to detach/replace	
Additional Categories: <input checked="" type="checkbox"/> Public Safety		

Category: Mobility		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2 style="margin: 0;">Other Detection Options</h2>		
Description: Rather than using cameras, a variety of other sensors including radar, infrared, thermography, induction, or magnetic fields can be used to detect vehicles or pedestrians. For example, vehicle volumes and speeds can be detected by radar. Pedestrians and bicyclists can be detected by thermal imaging cameras. Parked vehicles could be detected by in-pavement magnetic field sensors. Any of these sensors can communicate wirelessly with a smart city platform for easy monitoring and analysis.		Applications: Vehicle counts Pedestrian/bicyclist counts Curbspace/parking data and enforcement Vendors: CIMCON Siemens Mobility ENE.HUB Signify (formerly Phillips Lighting) Pangea by Visionaire Lighting
Benefits: On-demand traffic monitoring Congestion management	Hardware: Various: installs on pole, on pavement, or in pavement	Communications: Wired or wireless
Monitoring: Presence of vehicle Presence of pedestrian/bicyclist	Maintenance: Easy to replace	 <p>Source: https://www.mobility.siemens.com/global/en/portfolio/road/smart-intersection/traffic-detectors.html </p>
Additional Categories: ✓		

Public Safety

Category: Public Safety		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2>Noise Detector</h2>		
Description: <p>By monitoring noise levels, emergency responders can react to sudden increases in noise levels that are associated with aggressive and/or criminal events, including gunshots or breaking glass. Such noise detection may also be paired with sound recording to help understand key events just before or after a crime.</p> <p>Noise ordinance compliance can also be more effectively monitored, with the potential for automatic alerts sent to nearby businesses such as concert venues and bars that may be more likely to produce noise.</p>		Applications: Emergency responder alerts Criminal evidence Noise compliance violation monitoring and alerts Vendors: Ubicquia (feature of Air Quality sensor) CIMCON (Aggression events) ENE.HUB Signify (formerly Phillips Lighting) Pangea by Visionaire Lighting
Benefits: Faster emergency response Improved noise ordinance compliance	Hardware: Straps onto pole Plug-in for power	Communications: Wireless
Monitoring: Decibel sensitivity varies	Maintenance: Easy to detach/replace Over-the-air updates	 <i>Source: CIMCON Gunshot and Aggression Detection Technical Data Sheet</i>
Additional Categories: <input checked="" type="checkbox"/> Environmental and Sustainability		

Connectivity

Category: Connectivity		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2>Asset Management</h2>		
Description: <p>A key feature of smart streetlights is the monitoring of streetlight health. If power usage or line quality fluctuate outside of a normal range, maintenance can be performed to ensure continuous service is provided. If an unexpected power loss occurs, an alert can be generated with detailed information about the time of failure and equipment status immediately before power loss, which can help diagnose the issue and reduce the repair time.</p> <p>Additional sensors can be deployed to monitor transformers and utility poles to detect the need for replacement before equipment failure occurs. If a pole is tilting due to weather or due to a vehicle collision, an alert can be sent to prioritize repairs before further damage occurs. The transformer sensor can measure additional conditions relevant to power grid health.</p>		Applications: Equipment health tracking for replacement schedules Equipment failure prediction and prevention Vendors: Ubicquia (transformer and pole) CIMCON Siemens Mobility ENE.HUB LightGrid by GE Current Signify (formerly Phillips Lighting) Pangea by Visionaire Lighting Holophane
Benefits: As-needed equipment maintenance Helps prevent utility outages Reduced equipment repair times	Hardware: Attaches directly to luminaire, utility pole, or transformer	Communications: Wireless
Monitoring: Light power usage Power line and load quality Light tilt Light vibration Light power loss detection <i>Utility pole sensor</i> Pole tilt Pole vibration <i>Transformer sensor</i> Oil temperature Oil pressure Pole tilt Pole vibration Power output	Maintenance: Easy to detach/replace	 Source: https://www.ubicquia.com/products/tvm
Additional Categories: <input checked="" type="checkbox"/> Public Safety		

Category: Connectivity		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2>Small Cell</h2>		
Description: Small cell antennas are key for cellular and data providers to provide the dense coverage needed to provide 5G service. Small cells are so named because they are substantially smaller than the traditional cellular towers. They are lower to the ground and have a smaller range, and so they must be well-distributed to provide continuous quality service. Streetlights offer the potential to leverage existing well-distributed infrastructure to provide small cell technology. This high-quality data service can be leveraged to offer high-speed public Wi-Fi.		Applications: Private Cellular Networks Public Wi-Fi Vendors: Ubicquia CIMCON ENE.HUB
Benefits: Improved cellular service for community Potential revenue stream	Hardware: Attaches directly to luminaire	Communications: Wireless or wired
Monitoring: Power use	Maintenance: Over-the-air updates	 <i>Source: Ubicquia Information Brief</i>
Additional Categories: <input checked="" type="checkbox"/> Economics		

Category: Connectivity		Readiness: Green Light/Proven <input type="radio"/> Tested <input type="radio"/> Pilots <input checked="" type="radio"/> Proven
<h2>Public Wi-Fi</h2>		
Description: Publicly available Wi-Fi hotspots helps the population stay productive on-the-go. These hotspots can provide internet connectivity to underserved communities, and they could encourage public transit use by allowing commuters to work at bus stops and transit stations. Wi-Fi service could be offered for free or could be provided on a subscription basis to generate revenue.		Applications: Public Wi-Fi Vendors: Ubicquia ENE.HUB Signify (formerly Phillips Lighting) Pangea by Visionaire Lighting
Benefits: Potential revenue stream	Hardware: Attaches directly to luminaire	Communications: Wired: ethernet, fiber, LTE, or DOCSIS
Monitoring: Number of connections Duration of connections	Maintenance: Over-the-air updates	 <p><i>Source: Ubicquia Product Catalogue</i></p>
Additional Categories: <input checked="" type="checkbox"/> Economics		

Attachment

WRCOG Smart Streetlights – Procurement Strategies

June 1, 2022

Daniel Soltero, Program Manager
Western Riverside Council of Governments
3390 University Ave, Suite 200
Riverside, CA 92501

Subject: WRCOG Smart Streetlights: Procurement Strategies Review

Introduction

Considerations for deployment of any new technology-based system must extend beyond the individual equipment and system components. This memo reviews administrative and financial activities that WRCOG member agencies could pursue to successfully deploy Smart Streetlight components and systems.

Public lighting systems generally require one or more agreements between electrical power providers (in this case, Southern California Edison (SCE)) and public agencies. Adding Smart Streetlight components to the lighting network will likely include agreements with additional partners. Vendors may also be able to offer financing approaches that may offset the cost of system components or may provide an additional revenue stream for member agencies, which could be further invested into Smart City initiatives. WRCOG member agencies may also be presented with an opportunity to realize interjurisdictional benefits of larger-scale Smart Streetlight technology deployment or leverage the cost-savings from converting to LED light fixtures.

City Purchase with License Agreement with Southern California Edison (SCE)

In 2017, the participating agencies of the WRCOG Regional Streetlight Program entered into individual purchase and license agreements with Southern California Edison (SCE) for some or all the streetlight poles, fixtures, and hardware as part of the effort to upgrade to LED capabilities. As a result of these agreements, the agencies outright own the above ground infrastructure, and are responsible for the maintenance and operation of the poles and attached lighting fixtures. These agreements also explicitly pertain to “Wireless Attachments” for SCE equipment.

SCE has installed communications equipment on the light poles that are necessary for operating or managing the electricity distribution system, consisting of a radio communications device attached to the mast arm. Per the agreements (and necessary for the functionality of the electricity distribution management system), SCE has priority on space for this equipment. SCE is allowed cost-free access to the poles to maintain this equipment. The agreements grant SCE a cost-free license to leave in place, operate, maintain, remove, and replace their equipment.

The agreement between the agencies and SCE allows for the installation of other third-party equipment, provided the equipment does not interfere with the communications of the SCE equipment. The agreement also allows the individual agencies to deny SCE from installing additional equipment if that installation interferes with “municipal operations”. This definition could be interpreted that smart city applications are considered “municipal operations”.

The agreements specify that the installation of any additional equipment may not be “non-conforming loads”. In essence, any additional operating equipment placed on the street poles cannot consume electricity markedly different from the amount and frequency of the streetlights.

While these agreements were instrumental for the streetlight upgrade process, they are also important as they provide guidelines for the installation of equipment on the light poles, and for access to equipment installed. While there are separate agreements for each agency, the concept, content, and language are consistent across the agreements, providing a framework for leveraging these assets for future Smart City infrastructure.

Considerations

Below are some considerations as WRCOG communities explore the potential of leveraging their streetlight infrastructure for smart city applications.

Restrictions. There are no outright restrictions in the agreement that would prohibit third-party smart city application equipment. The agreements include language for permitting additional equipment on the streetlight poles (with the restrictions detailed in the previous section of this memo).

SCE Equipment. Existing SCE equipment has a priority on the streetlight poles; the agreements specify that any additional equipment must not interfere with the SCE communications equipment. While this isn't expected to be an impediment for adding smart city related equipment, SCE will need to be a continued partner with any initiative to leverage the infrastructure.

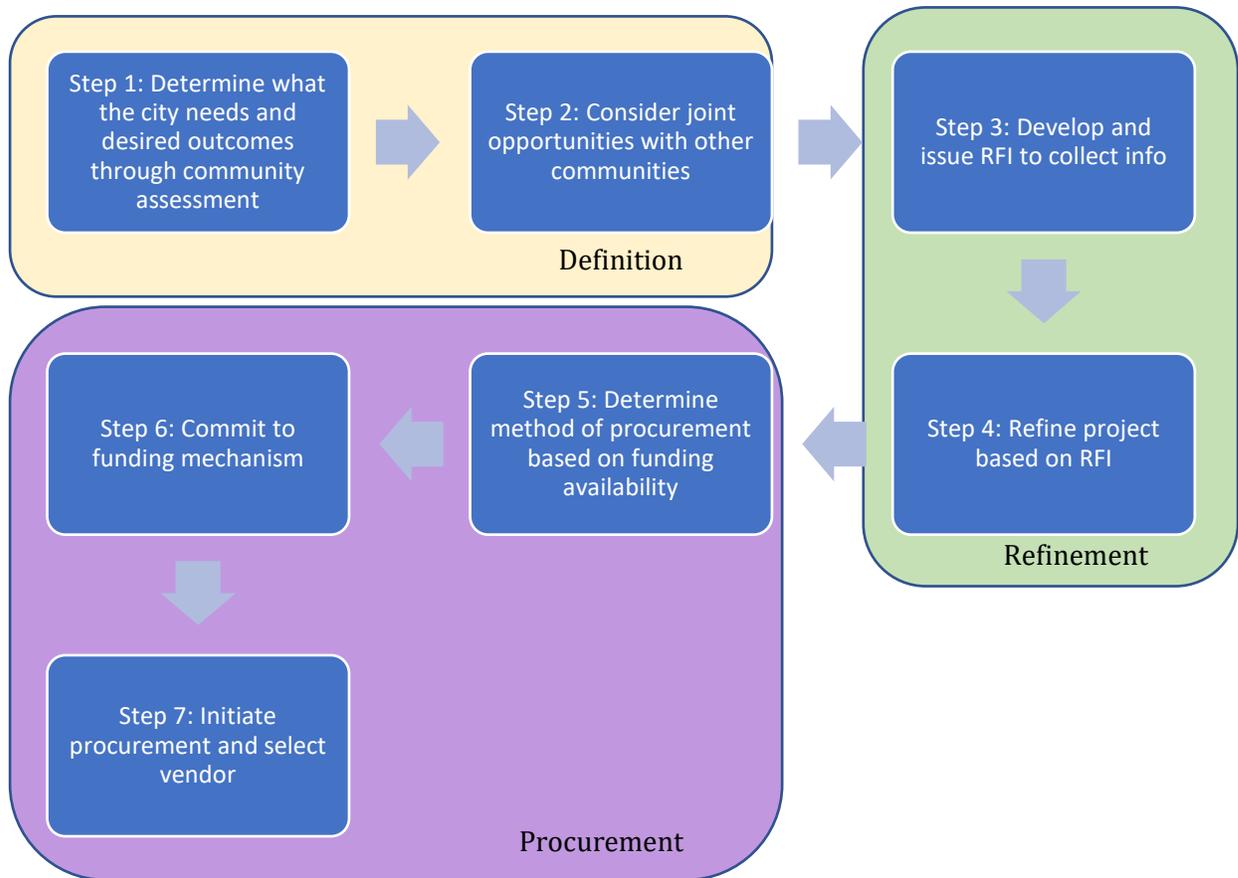
Evaluation of Poles. Whenever new equipment is proposed to be added to existing streetlight poles, an evaluation of structural impacts of the equipment, power need and impacts of the equipment, and wireless communications interference should occur. Depending on the contracting method pursued, these items could be conditions placed on the third party.

Non-conforming loads. Proposed equipment on the streetlight poles to support smart city applications should also include an electrical analysis, to ensure that non-conforming loads are not placed on the electrical distribution system.

Existing Framework. The no-fee streetlight pole license agreements guide the requirements of additional third-party equipment suppliers. The provisions for site access, operations and maintenance, and agency coordination have been agreed to between the agencies and SCE. These license agreements can serve as the basis for engaging third-party suppliers of smart city-related equipment.

Procurement Decision Roadmap

The procurement decision roadmap was created to guide cities through the process to make key decisions in partnership, procurement, and methods.



Procurement Types

Through research and engagement with other entities, it was identified that there are several options for municipalities to procure smart streetlight technologies. The context of the procurement and the agency leading the effort can make a difference in the success of a particular type of strategy. Each of the strategies identified below are feasible for an individual city or multiple cities to procure jointly, but each have their own challenges and opportunities. This section is intended to guide cities through the process so each can make the best choice for its needs.

Outright Equipment Purchase

The desired equipment could be purchased outright. This option would follow an agency procurement process. With the purchase of the equipment, there would need to be a consideration for operations and maintenance. One option is for agency maintenance and/or IT staff to perform operations and maintenance duties.

Another option is to include these tasks in the vendor contract. There may be an annual or monthly fee associated with operations and maintenance but could be ideal if staffing numbers or skillsets are a concern. The framework for vendor operations and maintenance appears to be addressed through the existing streetlight agreements. If this option is chosen, it would be important to evaluate bids on total cost of ownership or life-cycle costs instead of initial installation fee.

With purchasing the equipment, it should be easier to lay claim to the data. This still needs to be specified in the procurement documents. However, the agency may need to host the data – depending on the maintenance and operations options chosen – which leads to data privacy concerns as well. The agency should leverage data to make informed decisions at an aggregated level but having granular data could be a concern.

Pros:

- Use standard procurement processes
- Control over requirements, specifications, and equipment
- Known project cost

Cons:

- Incur expense to maintain and operate system (in-house or contractor)
- Staff support needs may exceed capabilities or limitations
- Data management responsibility
- Least amount flexibility
- Responsible for equipment after replacement / obsolescence

Public-Private Partnership

A city can partner with the vendor to develop a Public-Private Partnership, offering the public space for technology installations in exchange for desired sensors and data. The challenge resides in that the efforts need to be a positive value-proposition for vendor. This usually comes in the form of data or ability to charge for services.

Privacy agreements due to using public infrastructure should be a consideration. The vendor would have a strong claim to the data, so procurement and partnership documents need to be clear and strong in identifying data requested and required so there is no misunderstanding and the agency gets the data desired.

This method could require an agency to provide capital costs up to the full amount depending on the equipment or applications requested by the agency. The procurement documents should make the competitive bid the least cost to city to select the vendor.

Pros:

- Minimize cost to City
- Easiest to implement “design, procure operate and maintain” model
- Could be easiest approach to provide “application as a service” model.

Cons:

- Private party needs a commercial incentive
- Privacy & ownership of data
- Potential negative public reactions to data sharing

Demonstration or Pilot

A lot of technology projects and deployments start with a demonstration or pilot phase. While they are a great way to determine the feasibility and value of a technology application, there are limitations. The deployments would be product-specific giving less flexibility to get a smart city application the agency would want. Most systems engineers advise to shy away from single vendor driven smart city solutions, so it would be important to gather a variety of technology applications from different vendors. Further, a pilot would likely only address a fraction of the total need locations desired, requiring investment beyond the pilot phase if that technology were selected for procurement.

A demonstration would be the most likely option to have the least cost to the agency, but there could be a high chance of hidden costs to agency, through staff time. In a procurement scenario, terms and duties are clearly defined. In a demonstration, they are less defined and often agency staff have to invest time to work on the integration and support of the product. Since pilots are often used by vendors as a way to prove-out solutions, there is also a chance of not having enduring, permanent, workable application.

Finally, data requests and collection may be the most challenging in this scenario, as the applications are deployed at the vendor's expense. The vendor may see value in the data as the return on investment but may not be willing to share critical data due to the lack vested interest by the city or the data privacy considerations.

Grants

A great opportunity for cities to demonstration or deploy equipment is through the securement of grant funding. Many local, regional, state, and federal opportunities exist. Typically, the larger the grant, the more detail the plan supporting the effort needs to be. This could be in the form of an overall smart city or community plan. The WRCOG Smart Streetlight Implementation Plan may suffice with some customization for the specific agency.

Preparedness for grant opportunities requires tracking grants to be ready when they are advertised since there is typically a short application window. Grants often have a long, detailed process that involves many city departments and resources.

Extensive discussion with potential partners is also required since cooperation and teambuilding usually provide the best chance of success, especially when showcasing local match or in-kind contributions.

Pros:

- Likely to be little or no cost
- Full engagement of vendor
- Could influence development of equipment or application.
- Potential discount on future purchase
- City could be in a leadership role

Cons:

- Likely not a long-term solution
- May not achieve needs or desired outcome
- May be hidden costs

Pros:

- Dedicated funding source
- Potential technical and administrative resources from grantor

Cons:

- One-time funding
- May not fund operations and maintenance
- Local match may be required
- Costs incurred for grant application without a guarantee of grant

With the signing of the Bipartisan Infrastructure Law (Infrastructure Investment and Jobs Act), some existing programs received continuation funding and new programs were created. The following programs may have applicability to the deployment of smart streetlight technologies:

- Congestion Mitigation and Air Quality (CMAQ) Improvement Program fund can be used for technologies that reduce congestion, such as traffic cameras used to improving signal timings, and for electric vehicle charging equipment.
- Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) grant program included a formula and competitive grant program to support resilience improvement to transportation infrastructure, community resilience and evacuation routes, and at-risk coastal infrastructure.

The Department of Energy also has a Carbon Reduction Program (CRP), but it requires each state, in consultation with any MPO designated within the state, to develop a carbon reduction strategy not later than 2 years after enactment and update that strategy at least every four years, so coordination with the State of California would be required. CRP funds may be obligated for projects that support the reduction of transportation emissions, including:

- traffic monitoring, management, and control
- deployment of infrastructure-based intelligent transportation systems capital improvements and the installation of vehicle-to-infrastructure communications equipment
- street lighting and traffic control devices with energy-efficient alternatives
- support of the deployment of alternative fuel vehicles

projects to improve traffic flow that are eligible under the CMAQ program, and that do not involve construction of new capacity

Attachment

WRCOG Smart Streetlights –
Sample Request For Information
(RFI)

**AGENCY
#####, CALIFORNIA
(###) ###-####
##, 2022**

<<City Logo>>

Request for Information No. #####

for

**SMART STREETLIGHT
TECHNOLOGIES**

Due Date: ### ##, 2022

Time: #:## P.M.

DELIVERY OF RESPONSES

By Mail:

City of _____

Procurement Department, 11th floor

Attn: _____

_____, CA #####

1.0 Introduction.

Between 2019 and 2020, WRCOG converted over 50,000 streetlights across 11 local jurisdictions to LED bulbs. The Regional Streetlight Program included purchasing nearly all of the streetlights from the local utility, SCE. The LED bulbs use substantially less power, resulting in a 70% reduction in energy consumption. The upgrade also substantially reduced light pollution, benefiting the community as well as the Palomar Observatory in San Diego County. The cost savings and reduced power draw present an opportunity to add smart city architecture to the streetlights with minimal net cost increases to WRCOG communities. The Smart Streetlight Implementation Strategy has been evaluating which technologies would provide the most value to the WRCOG communities. The <CITY> has been working with WRCOG to evaluate smart streetlight technologies and determine which may be suitable in its jurisdiction.

This RFI will assist in evaluating which technologies could be considered for the <CITY> Smart Streetlight program.

1.1 **Objective.** The objective of issuing this RFI is to:

- a) Determine the level of market interest in providing smart streetlight technologies;
- b) Obtain information on potential financing options for adding and integrating smart city infrastructure onto the existing LED streetlights

This RFI seeks to gather information from equipment and solution providers about the options for implementing smart streetlight technologies to assist the City in advancing its innovative vision. The City anticipates that the benefits of smart streetlight technologies may include the creation of cost-saving opportunities or opportunities to generate revenue, or both; the enhancement of the City as a community and regional destination; enhance municipal services to City residents; and direct and alternative connectivity options for the City's networking needs, both present and in the future. Firms are encouraged to recommend innovative financing options that will advance this vision for the City.

1.2 **Background.** The City of _____ .<<Inset City description here>>

_____ Department of _____ operates and maintains approximately _____ city-owned/city-leased LED streetlights. Department of _____ is responsible for the City network, which provides <<provide info on IT network, if applicable>>.

2.0 RFI Responses.

Interested parties are invited to submit responses to the requests for information set forth in this Section 2.0 ("RFI Responses") in accordance with the requirements of Section 3.0 ("Response Contents"). Information that would be helpful may include the following:

- 2.1 Provide an overview of the technology or services available including key features and benefits and how the technology or services could provide a competitive advantage to the City by leveraging the existing LED streetlight system;

- 2.2 Describe potential service locations where this technology or service relating to the City's LED streetlights could be implemented and examples of successful projects in other cities;
- 2.3 Describe how the equipment or applications regarding the City's LED streetlights, or both, could complement or enhance, or both, the operations of the City's public works departments;
- 2.4 Provide a general timeline for implementation of described smart streetlight technologies and applications related to the City's LED streetlights, including, if applicable, a general timeline for the design, construction, and use;
- 2.5 Describe the source(s) of the revenue stream(s) that smart streetlight technologies or applications could generate for the City;
- 2.6 Provide the best estimate of the cost and revenue generated for the City by the smart streetlight technologies and applications related to the LED streetlights;
- 2.7 Provide Respondent's thoughts or observations on actions that might be taken by the City that could improve the City's ability to produce a revenue stream from the equipment or applications related to the LED streetlights.
- 2.8 Other information specific to the nature of this RFI and deemed important by the Respondent.
- 2.9 **Application considerations.**
- A. Provide a typical approach and ability to provide the following applications leveraging the City's LED streetlight system, as applicable:
- Cameras
 - Automated License Plate Recognition (ALPR)
 - Public wi-fi
 - Electric Vehicle Supply Equipment (EVSE)
 - Smart digital banners
 - Radiation detector
 - Gas leak monitor
 - Water meters
 - Noise monitor
 - Air quality monitors
- B. Could equipment or applications leveraging the LED streetlights include the installation of electric vehicle charging infrastructure on light poles?
- C. What public safety provisions may be enhanced through smart streetlight technologies or applications related to the City's LED streetlights?
- D. How may environmental issues, such as weather conditions, pollution levels, energy efficiency, water use, and stormwater, can be collected leveraging the City's LED streetlights?

- E. How could the City's LED streetlight system facilitate 5G deployment?
- F. What features could be incorporated into the City's LED streetlight system to support community resilience and help citizens to adapt to operating failures, service issues, and external events such as weather events or natural disasters?
- G. Could the City's LED streetlight system be used for the delivery of internet access services to the public?
- H. Can you provide product cutsheets for review by the City?

2.10 Financial Plan.

- A. List examples of funding models that have been successful in other cities to develop smart city infrastructure leveraging LED streetlight systems. Of particular importance is those models where the streetlights have already gone through an LED conversion.
- B. What types of procurement and financing models do you participate in? Does your company take the lead in the financing?
- C. Is it typical for the public agency(ies) to provide any matching funding as part of the procurement?

2.11 Operating Plan.

- A. Would the smart streetlight technologies and applications leveraging the LED streetlight system be operated by the City or by vendors and contractors?
- B. How is maintenance of the added smart city infrastructure generally handled and funded?
- C. What type of joint public/private governance could be anticipated?
- D. What sort of Service Level Agreements could be provided for City integrated systems as a part of smart streetlight technologies leveraging the LED streetlight system?

2.12 Information and Innovation Plan.

- A. When data are generated by various smart streetlight technologies, who collects and owns the data?
- B. What data collected through smart streetlight technologies could be made available to the public and how would information requests be handled?

- C. Do you have a standard data sharing agreement, or do you rely on the public agency(ies) to develop?
- D. What types of data analytics are measured and collected through smart streetlight technologies and how could the outputs of the analytics be used to better manage City operations or provide additional services?
- E. How could ongoing innovation be encouraged by the smart streetlight infrastructure regarding both usage of and the upgrade to innovative technologies that evolve during the life of the infrastructure, as well as features that attract future innovation to the City?

3.0 Response Format.

The response should be organized as set forth in this section.

- 3.1 The Respondent shall submit one electronic copy in a portable document format (PDF) readable by the Adobe Reader program and in a Microsoft Word format that can be searched.
- 3.2 The response submitted by Respondent should include the following: (i) a cover letter, (ii) a table of contents, and (iii) your detailed responses to any or all of the requests for information set forth in Section 2.0.

4.0 Inquiries.

Please direct all questions regarding this Request for Information to XXXXX at XXXXXX@XXXXXX or #####.

5.0 Submissions.

Responses to the RFI should be submitted to XXXXXXX@XXXXXX no later than XXXXXXXX XX, 2022 at XXXX PM. The submission should be in PDF format, and only digital submissions will be accepted. Responses received after the deadline may not be considered.

6.0 Disclaimer.

- 6.1 Please be advised that this is a request for information only. This RFI is issued solely for information and planning purposes – it neither constitutes request for proposals nor is a promise to issue an RFP in the future. No warranties or representations of any kind are made by the City, including a representation or warranty as to the suitability of the City’s infrastructure for any particular purpose.
- 6.2 Parties responding are advised that the City will not pay for any information or administrative costs incurred in response to this RFI; all costs associated with responding to this RFI will be solely at the interested party’s expense. Submission of a response to this RFI is not considered a response to any future solicitations for potential opportunities related to smart city infrastructure or for any other design, construction, finance, maintenance or operations opportunities offered by the City. The City reserves the right to cancel this RFI at any time with or without notice to respondents and without liability.

- 6.3 Ownership of all data, materials and documentation originated and prepared for the City pursuant to this RFI shall belong exclusively to the City.
- 6.4 **Proprietary Information.** Firms should indicate on the Cover Sheet any portions of their response that the firm deems proprietary and return the signed Cover Sheet with their submission. Please list the page number(s) and reason(s) the firm considers the data or materials to be proprietary.

**include SCE equipment are on the poles.

** And then have a question being “how would you ensure that the equipment needed to support the smart city application would not adversely interfere with the pre-existing SCE equipment referenced in xxxx.xxx.

**Where have they installed equipment and applications previously?

Attachment

WRCOG Smart Streetlights – Implementation Strategy

May 31, 2022

Daniel Soltero, Program Manager
Western Riverside Council of Governments
3390 University Ave, Suite 200
Riverside, CA 92501

Subject: WRCOG Smart Streetlights: Implementation Strategy

Introduction

Between 2019 and 2020, the Western Riverside Council of Governments (WRCOG) converted over 53,000 streetlights across 11 local jurisdictions to LED fixtures. The Regional Streetlight Program included purchasing nearly all of the streetlights from the local utility, Southern California Edison (SCE). The LED fixtures use substantially less power, resulting in a 70% reduction in energy consumption. The upgrade also substantially reduced light pollution, benefiting the community as well as the Palomar Observatory in San Diego County. The cost savings and reduced power draw present an opportunity to add smart city architecture to the streetlights. As a result, WRCOG set out to create a Smart Streetlight Implementation Plan to assess how member agencies could leverage their streetlight infrastructure with smart city technologies to provide the most value to their communities. This Implementation Plan takes a holistic approach to smart streetlight integration, considering existing infrastructure and staff capabilities, technology readiness, identified community needs, and approach to procurement. The result is a strategy that is completely scalable and can be applied to the wide range of community contexts that fall within the Western Riverside County subregion.

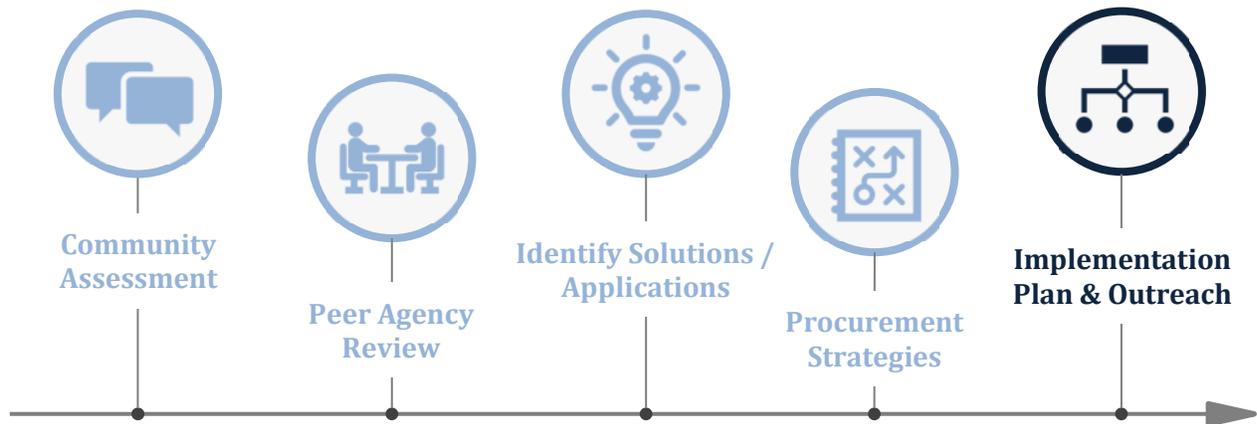
Smart Streetlight Background

Converting streetlights to LED offers a significant benefit of reduced energy consumption and light pollution. Adding smart streetlight controllers to LED light fixtures yields the added benefit of remote light control and tilt/vibration sensing. Dimming capabilities alone further reduce energy draw, inventory costs, and operation and maintenance costs. Most importantly, streetlights equipped with smart controllers can be leveraged as part of an overall Smart City framework, allowing additional sensors and connections to be added to the fixture.



Project Process

The approach to developing the Smart Streetlight Implementation Plan was a multi-step process. The first step of this evaluation was to survey WRCOG communities to identify existing infrastructure as well as staff capabilities. The second step was to learn from the successes and problems experienced by other agencies implementing smart streetlights. Next, the “menu” of technologies was evaluated for consideration in the WRCOG Smart Streetlight program. Lastly, financial and administrative action items were identified, and a Request for Information (RFI) template was created to assist the WRCOG or its members in future procurement of vendor hardware and services. The findings of each of these tasks have been compiled into the Implementation Strategy presented in this document.



Community Assessment

WRCOG members were contacted for participation in the Community Assessment task, the goal of which was to identify the current state of the infrastructure in each jurisdiction. In total, twelve jurisdictions in the WRCOG provided feedback. Survey responses provided information on the number, type, ownership, and maintenance of streetlights, traffic signals, and IT/networking in each city. The survey responses are detailed in **Appendix A**.

This task showed that the number of streetlights within each jurisdiction ranges from 340 to approximately 30,000. Streetlights are largely owned by the city or Southern California Edison (SCE), and maintenance is primarily contracted out for agencies in the WRCOG Regional Streetlight Program (Yunex). Most or all of the streetlights within the responding jurisdictions have been converted to LED. Larger cities own and maintain their own streetlights.

The number of traffic signals in each jurisdiction ranges from five to 400. Signals are owned by the City, County, or Caltrans. Traffic signal maintenance is mostly contracted out either to a vendor or the County of Riverside, but some agencies have one or two in-house staff as well. Larger cities own and maintain their own traffic signals.

Lastly, 60% of respondents indicated that their jurisdiction provides public wi-fi in some city/county/municipal buildings. Less than half of the jurisdictions have communications systems for interconnected traffic signals. Nearly all of the respondents have in-house IT/networking staff, but most do not have any policies or ordinances related to data collection from publicly owned assets.

Peer Agency Reviews

A review of peer agencies that have successfully implemented smart streetlight technologies was conducted, such that the insight from their successes and challenges could be applied to the development of this implementation plan. The review included a combination of online research, interviews with key staff, and first-hand knowledge from staff involvement on Smart City plans, where applicable. The Peer Agency Review memorandum is located in **Appendix B**.

The agencies interviewed include the City of Los Angeles, the City of San Diego, the City of Las Vegas, and the City of Kansas City. The key takeaways from the peer review are:

- Identify program parameters ahead of time.
- Consider the agencies' current traffic signal and IT staff capabilities as well as the responsibilities for the systems.
- Start with a pilot for testing the technology and data quality.
- Understand that the current business model is uncertain.
- Understand who owns the data for the implemented systems.
- Public transparency in the process is essential.

Identify Solutions/Applications

Available technology applications were identified and assessed for consideration in the WRCOG Smart Streetlight program. The applications are grouped into general categories of primary technology applicability including Environmental and Sustainability, Economics, Mobility, Public Safety, and Connectivity. A total of twelve smart streetlight applications were identified as summarized below. The Application Review memorandum is found in **Appendix C**, including a description of each application in cut-sheet format.

Environmental & Sustainability

Air Quality Sensor: Monitor temperature, humidity, gas pollutants, and particulate matter

Dimming Light Control: Adjust light levels as needed based on ambient conditions or detection triggers (e.g., vehicle or pedestrian detected)

Water Detector: Identify flood events or assists with irrigation needs

Road Temperature Detector: Inform when road treatment is needed (e.g., salt for winter conditions)

Economics

Electric Vehicle Charging: Electric vehicle charging from on- or off-street parking spaces

Smart Banners: Display alerts for road users or private advertisements

Mobility

Smart Cameras: Cameras provide security/surveillance; video analytics can perform mobility counting, curbspace monitoring, or identify near-miss incidents

Other Detection Methods: Radar, infrared, thermography, induction, magnetic fields, etc. used for mobility detection

Public Safety

Noise Detector: Monitor noise levels to respond to noise ordinance violations, or combine with analytics to detect breaking glass or gunshots and alert emergency responders

Connectivity

Asset Management: Monitor streetlight health through power usage detection, or predict and prevent utility pole or transformer issues

Small Cell: Provide high-quality 5G cellular service

Public Wi-Fi: Wi-Fi hotspot for public use

Procurement Strategies

This task included reviewing the existing agreement between Southern California Edison (SCE) and the communities of WRCOG and identifying possible procurement types for smart streetlight projects. In 2017, the cities of WRCOG entered into individual purchase and license agreements with Southern California Edison (SCE) for some or all the streetlight fixtures and hardware as part of the effort to upgrade to LED capabilities. As a result of these agreements, the cities outright own the infrastructure and are responsible for the maintenance and operation of the poles and attached lighting fixtures. A review of the existing agreement with SCE shows that there are no restrictions that would prohibit third-party smart city application equipment. However, all proposed applications will need to be vetted through a structural and electrical analysis. Additionally, SCE equipment has priority over all city-owned equipment, so the utility provider should continue to participate in the discussion of WRCOG's Smart Streetlight Plan.

Procurement types were identified as (1) outright equipment purchase, (2) public-private partnership, (3) demonstration or pilot, and (4) grants. Selection of the procurement type may vary by project or initiative and will be informed through the Request for Information (RFI) process. A template RFI was created for engaging vendors process, allowing for input on technology features and benefits, financing of costs, operations and maintenance of equipment, and data management. The procurement type summary and template RFI document are contained in **Appendix D**.

Implementation Strategy

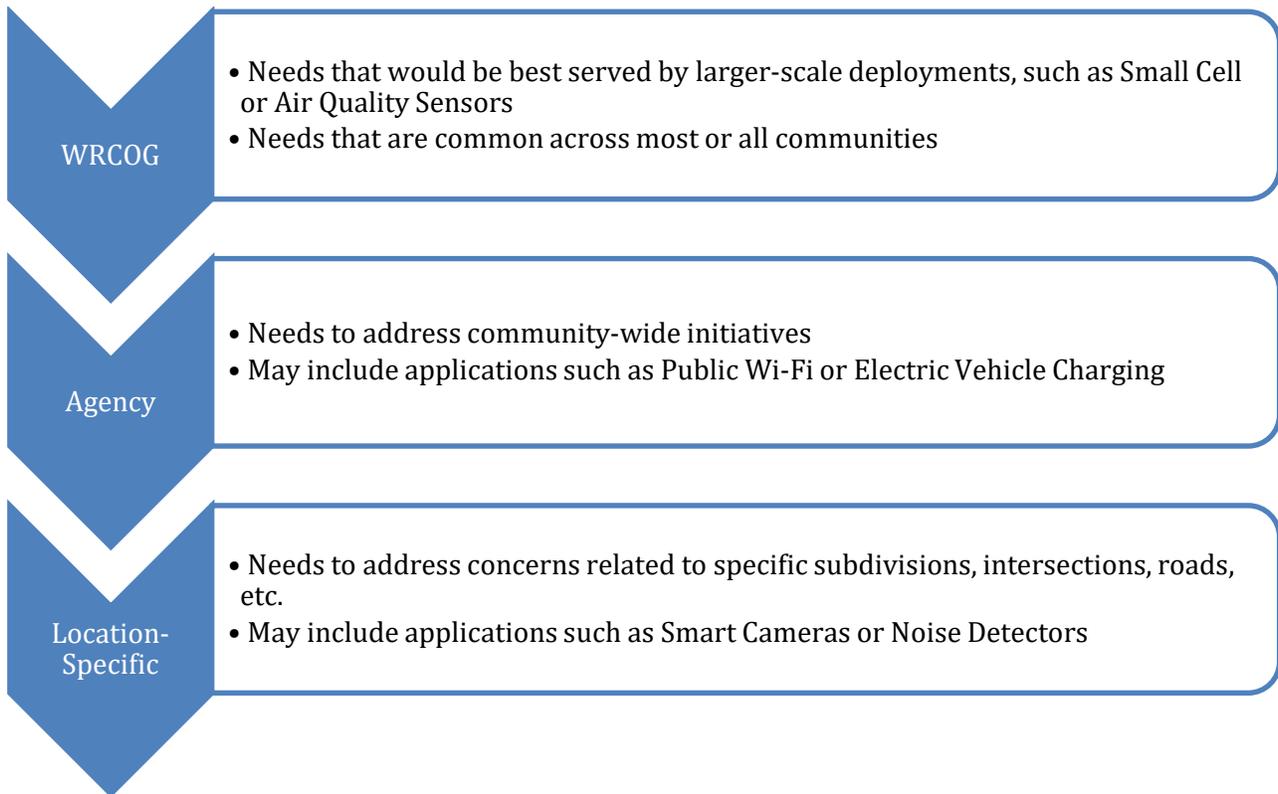
Taking the findings of the previous tasks in the project process, the implementation strategy summarizes the action items that the WRCOG and its communities will need to accomplish to build a successful Smart Streetlight Program. The implementation strategy is presented in three phases: (1) Assess, (2) Test, and (3) Expand. It is anticipated that this will be an iterative process, with phases revisited as the program matures.

Phase 1 – Assess

This phase describes processes to assess the community needs, agency capabilities, and technology readiness. In all, Phase 1 will result in a final list of feasible applications for immediate testing/deployment.

Phase 1A – Needs Assessment

A recurring message from the Peer Agency Review task (**Appendix B**) was that program needs should be well established at its inception. Therefore, the first phase of the implementation strategy is to assess needs. Due to the nature of the applications, it is likely that needs will vary significantly by agency and even throughout each community. However, overlapping initiatives between agencies or across the WRCOG members should be leveraged to the extent possible. Partnerships reduce the financial burden on any one agency, and larger-scale deployments may offer reduced per item costs. Needs should be considered at three geographical levels:



This assessment should be completed with input from agency staff, stakeholder engagement, and public engagement. Surveys are an effective strategy for receiving feedback from each of these groups, and survey questions can be adapted to varying knowledge levels. Initial surveys of the WRCOG members indicated that public safety applications were of the most interest at this time. Continual monitoring of public feedback channels in addition to crash patterns, areas of congestion, criminal activity, flood zones, etc. will identify patterns and “hot spots” that can be addressed through smart streetlight technologies.

Most importantly, this assessment should answer specific questions to set the goals of the program and the role of each individual application:

1. What is the problem that needs to be solved?
2. What is the expected impact of the application?
3. What are the expected secondary impacts, if any?
4. What data/information is required to measure the impacts?
5. Are there data privacy concerns?

The needs assessment will identify the complete “menu” of applications that each community, or the WRCOG as a whole, would like to consider for implementation. It may be necessary to further refine the list of applications meeting the community needs to a select few considering other factors such as cost, communications needs, maintenance aspects, and technology readiness. The table on the following page provides a side-by-side comparison of applications that can be used to assist communities in this prioritization exercise; more detailed information is contained in **Appendix C**. Application specifications will need to be checked and updated as technologies continue to progress.

This task will set realistic, and if possible, measurable expectations for the program and each of the selected applications. Having a clear understanding of the existing problems and expected impacts will be essential for public outreach and will simplify the benefit/cost analysis as projects begin to take shape (see Phase 2 – Test). Additionally, defining the needs up front lays the foundation for the entire program; not only are the applications themselves defined, but also the initial requirements for data management and vendor or staff capabilities.

Application	Benefit Categories	Relative Cost	Communications	Maintenance	Readiness
Air Quality Sensor	<ul style="list-style-type: none"> • Environmental & Sustainability 	<ul style="list-style-type: none"> • Low 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Easy to detach/replace • Over-the-air updates 	<ul style="list-style-type: none"> • Proven
Dimming Light Control	<ul style="list-style-type: none"> • Environmental & Sustainability • Economics • Public Safety 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Over-the-air updates 	<ul style="list-style-type: none"> • Proven
Water Detector	<ul style="list-style-type: none"> • Environmental & Sustainability • Public Safety 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Easy to detach/replace 	<ul style="list-style-type: none"> • Pilots
Road Temperature Detector	<ul style="list-style-type: none"> • Environmental & Sustainability • Public Safety 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wired or wireless 	<ul style="list-style-type: none"> • Easy to detach/replace 	<ul style="list-style-type: none"> • Pilots
Electric Vehicle Charging	<ul style="list-style-type: none"> • Environmental & Sustainability • Economics 	<ul style="list-style-type: none"> • High 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Easy to replace modular components 	<ul style="list-style-type: none"> • Pilots
Smart Banners	<ul style="list-style-type: none"> • Economics • Connectivity 	<ul style="list-style-type: none"> • High 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Easy to detach/replace • Over-the-air updates 	<ul style="list-style-type: none"> • Pilots
Smart Cameras	<ul style="list-style-type: none"> • Mobility • Public Safety 	<ul style="list-style-type: none"> • High 	<ul style="list-style-type: none"> • Wireless • Camera is hardwired to smart processor 	<ul style="list-style-type: none"> • Easy to detach/replace 	<ul style="list-style-type: none"> • Pilots
Other Detection Options	<ul style="list-style-type: none"> • Mobility 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wired or wireless 	<ul style="list-style-type: none"> • Easy to replace 	<ul style="list-style-type: none"> • Proven
Noise Detector	<ul style="list-style-type: none"> • Environmental & Sustainability • Public Safety 	<ul style="list-style-type: none"> • Low 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Easy to detach/replace • Over-the-air updates 	<ul style="list-style-type: none"> • Proven
Asset Management	<ul style="list-style-type: none"> • Public Safety • Connectivity 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wireless 	<ul style="list-style-type: none"> • Easy to detach/replace 	<ul style="list-style-type: none"> • Proven
Small Cell	<ul style="list-style-type: none"> • Economics • Connectivity 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wired or wireless 	<ul style="list-style-type: none"> • Over-the-air updates 	<ul style="list-style-type: none"> • Proven
Public Wi-Fi	<ul style="list-style-type: none"> • Economics • Connectivity 	<ul style="list-style-type: none"> • Medium 	<ul style="list-style-type: none"> • Wired: ethernet, fiber, LTE, or DOCSIS 	<ul style="list-style-type: none"> • Over-the-air updates 	<ul style="list-style-type: none"> • Proven

Phase 1B – Technology Assessment

The technology assessment will be completed by issuing a Request for Information to solicit responses from available vendors. The template RFI document prepared as part of the development of this plan (**Appendix D**) can be tailored to specific agencies and technologies of interest, based on the findings of the needs and agency assessment. This task will identify the practical elements of what is possible, including:

- How does the available technology and data align with the identified needs?
- What services are available through the vendor versus those that must be provided in-house (e.g. data management, operations and maintenance)?
- What funding mechanisms are available through vendor partnership?

From this assessment, a final list of preferred applications and associated vendors will be developed. The information gathered on available vendor services and funding mechanisms will be carried forward into the Agency Assessment task.

Phase 1C – Agency Assessment

Based on the outreach completed in previous tasks, it has been identified that communities are at varying levels of maturity regarding streetlight infrastructure, staff, and IT/networking. The community assessment survey in **Appendix A** can serve as an initial evaluation. The goal of the agency assessment phase is to expand upon this information, specifying existing capabilities and gaps that should be addressed as the program progresses. The AASHTO capability maturity model (CMM) assessment for Transportation Systems Management and Operations (TSMO) programs provides a basic framework that the WRCOG communities may apply for the self-assessment phase. The CMM assessment considers six dimensions:

1. Business Processes – Planning, programming, budgeting, and implementation.
2. Systems and Technology – Systems engineering, standards, and technology interoperability.
3. Performance Measurement – Measures, data/analytics, and utilization.
4. Culture – Technical understanding, leadership, outreach, and program authority.
5. Organization/Workforce – Organizational structure and workforce capability development.
6. Collaboration – Partnerships among levels of government with public staff agencies and private sector.

The AASHTO process includes a one-minute evaluation¹ and guidance on how to advance each dimension to the next level. While this is specific to TSMO programs, the assessment can loosely be interpreted for application to any technology program including this Smart Streetlight program. The outcome of this phase will be a list of actions items, which may include:

- Develop funding strategies to support the Smart Streetlight Program.
- Determine how the data from applications will be utilized, and if access to raw data output is necessary or if a dashboard application is sufficient.
- If ownership of the data is required, ensure that the appropriate back-office systems are in place including staff and network servers.
- Develop or update existing policies and procedures to support planning, deployments, operations, and maintenance.
- Outreach and collaborate with internal and external stakeholders including other WRCOG agencies, the community, and other third parties.

This process is important to determine what an agency can support with its existing capabilities. It will inform the procurement process and requirements that identify what a vendor is to provide. As an example, an agency may not have a robust cloud-based network that can handle large amounts of raw data and may prefer to receive dashboards. On the other hand, another agency may want several feeds of raw data to be able to overlay and better inform operational decisions.

Phase 2 – Test

The procurement type summary in **Appendix D** details the financing options available to fund individual smart streetlight projects. To minimize the funding burden and risk to the community, it is recommended that initial projects be limited to pilot deployments of applications that are new to each community. Standalone pilot sites will be determined through the assessment phase (Phase 1). After the demonstration period, the successes and lessons learned from the pilot should be determined, including a benefit/cost analysis and verification of data quality. Benefit/cost analysis is a necessary step in conveying the value of a project both to agency leadership and the public.

The testing phase provides the opportunity to see the applications in action and recognize their real-world implications for a minimal investment. The results of pilot study evaluations will guide the selection of future project priorities in Phase 3.

To streamline the testing phase, the WRCOG may take ownership over pilot projects developed throughout its communities. This will ensure consistency between deployments and a continual progression of knowledge, skills, and abilities that can be shared with all jurisdictions. The WRCOG can also take ownership over the creation of specific policies and guidelines for smart streetlight application implementation, which will be developed as the results of this testing phase are gathered.

¹ http://www.aashtotsmoguidance.org/one_minute_evaluation/

Phase 3 – Expand

Once proof of concept has been shown in Phase 2 – Test, the last phase will examine the available funding to expand the most successful pilot projects into full scale deployments. At this time, available technologies should be reevaluated through the RFI process to ensure that prioritized projects are aligned with the latest capabilities and features. Successful pilot projects that are not eligible for outside funding should be prioritized for funding by the WRCOG or individual communities. Project applications that are eligible for outside funding may be sidelined for future submission on federal grant applications.

Summary

The conversion to LED streetlights throughout the WRCOG communities offers an opportunity to lay the groundwork for a future Smart City. The WRCOG Smart Streetlight Implementation Plan presented here was developed based on the findings of extensive outreach and research efforts. The plan identifies the processes and action items to be undertaken by each community and the WRCOG as a whole to realize a successful smart streetlight program. This strategy should be approached as an iterative process, with phases revisited as the program matures and new funding opportunities emerge.

Attachment 7

WRCOG Smart Streetlights - Broadband Assessment

May 26, 2022

Daniel Soltero, Program Manager
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Riverside, CA 92501

Subject: WRCOG Smart Streetlights: Broadband Assessment

Michael Baker is assisting the Western Riverside Council of Governments (WRCOG) in developing a Smart Streetlight Implementation Plan. As part of this effort, one of WRCOG's member agencies has requested that WRCOG evaluate the potential for additional efforts to encourage the development of a Broadband network serving both residences, businesses and government facilities. Michael Baker has reviewed previous and ongoing efforts to deploy Broadband throughout Riverside County, and has identified other examples of regional Broadband efforts that WRCOG could potentially emulate. This technical memorandum summarizes the findings from that review.

Regional Efforts

RIVCO Connect

RIVCOConnect is a County initiative to address digital inequity by providing access to technology and high speed broadband internet in the region. One of the goals of the program is to bring affordable, high speed broadband network countywide and provide service to all residents regardless of economic status of geographic location.



The program was initiated in 2015 and lead to the development of a communications master plan in 2016 that set the course for implementation of regional broadband in the County. In 2017, Riverside County released a Request for Participants to deploy advanced broadband systems throughout the County. The request described a goal of providing a fiber wherever possible, and applying alternative technologies where fiber is not possible, providing all residents and businesses with access to high-quality internet and bridging the digital divide.

According to the April 2, 2018 WRCOG Board of Directors Regular Meeting Minutes, the request received eight responses. However, Internet Service Providers were not willing to enter partnerships at the local level without public funding. The County therefore decided to leverage available assets to advocate for providers to build a county-wide broadband network.¹

WRCOG and Michael Baker met with Tom Mullen from RivCoConnect to discuss the details of the RivCO Connect efforts. Based on the interview with Tom Mullen, RIVCOConnect has focused from providing broadband internet service to County residents to advocating and developing programs that connect residents with services providers who offer affordable high speed broadband internet in the region. Providing assistance to the development community and local agencies on permitting for the

¹ https://wrcog.us/AgendaCenter/ViewFile/ArchivedMinutes/_04022018-128

construction and installation of broadband infrastructure is one of the ways the County can help move the needle in the implementation of this vision as well.

Through the research conducted RIVCOConnect has determined that the digital divide may be greater than presented. This is due to the coverage versus service issue. Internet service providers provide broad maps that illustrate coverage areas at a very high level. These maps fail to show the small gaps in the gross service areas. While service may be provided, it may not be accessible to the end user for several reasons. One is cost and another is connectivity to their homes. Until more information is provided by the service providers on who is connected to their systems, it will not be totally clear how well areas are connected. Hence the need to ensure affordable, connected services that reach all residents of the County – regardless of geography or economic status.

Inland Empire Broadband Consortium (IERBC)

The Inland Empire Regional Broadband Consortium (IERBC) was formed in 2012 is a non profit 501(c)(3) that addresses broadband technology access, planning, service reliability, affordability, infrastructure requirements and deployment, and needs within both San Bernardino and Riverside Counties. The program is funded through the California Public Utilities Commission (CPUC) in order to facilitate collaborative planning and to advance the common goals of closing the digital divide by improving access to affordable and reliable high speed broadband internet access in the Inland Empire.

WRCOG is an active member of the IERBC along with a diverse list of 34 additional stakeholders. The Counties of Riverside and San Bernardino, local cities, California State University San Bernardino, school districts, service providers, consultants, and smart cities advocates are all involved in the consortium, which provides for a diverse and well balanced team of dedicated professionals committed to advancing technology in the region.

The IERBC has actively advanced access to broadband in two key ways:

- ✓ Development of the Inland Empire Broadband Infrastructure and Access Plan (2014)
- ✓ Identification of and assistance with grant funding for the implementation of broadband programs

The [Inland Empire Broadband Infrastructure and Access Plan](#) focused on identifying the need in the region and in highlighting successes and advancements in promoting Smart Region policies and programs, including access to high speed broadband internet.

Grant funding is available for broadband deployment through the CPUC California Advanced Services Fund (CASF). CPUC developed the CASF program in 2007 to support projects that provided broadband services in areas currently without broadband access in underserved areas. Since its inception over \$645 million in grant funds have been awarded across five categories focused on infrastructure, public housing, rural and regional consortia grants, broadband adoption and tribal assistance. With assistance



Inland Empire Regional Broadband Consortium

IERBC Consortium Project Area Map

The Inland Empire Regional Broadband Consortium (IERBC) includes both San Bernardino and Riverside Counties. The Inland Empire has a population of 8.6 million and the two counties cover over 27,000 square miles. The Inland Empire is geographically diverse. The Inland Empire has densely populated urban areas, established and growing suburbs, rural areas, several mountain ranges, lakes, mountain pass areas, and vast high and low deserts. Below is a map showing the IERBC boundaries covering both San Bernardino and Riverside Counties for the Inland Empire region.



from IERBC, Over \$55 million in grant funding has been awarded to San Bernadino and Riverside Counties, which has reached over 17,000 underserved households in the region. This includes Anza Electrical Cooperative “Connect Anza) Phase 1 and 2, Charter Communications in Country Squire Mobile Home Estates in Moreno Valley, and Charter Communications (Spectrum) for the Soboba Springs Mobile Estates in San Jacinto within Riverside county.

California Advanced Services Fund

PU Code Sec 281 (amended by AB1665, Stats. 2017, Ch. 851) provides \$645 million for the CPUC to provide broadband access to no less than 98% of California households in each consortia region. ALL AWARD DATA AS OF JULY 1, 2021

Infrastructure, Loan, and Line-Extension Grant-- \$570 million

\$302 million awarded Supporting **88 projects** of which 79 last-mile/hybrid projects provide broadband access to 67,000 estimated potential households. The average cost per household to the CASF was \$2,989.

Public Housing Account -- \$25 million

\$13.9 million awarded for infrastructure and adoption projects* Supporting **322 projects**, connecting 21,268 affordable housing units across 31 counties.
Providing digital literacy training to **128 locations** with 28,652 residents in total.

Rural and Regional Urban Consortia Grant -- \$25 million

\$18.4 million awarded Supporting **12 Consortia grants** (i.e., one additional Consortia application pending for Commission approval) that are facilitating CASF infrastructure applications to serve 44 counties to advance broadband deployment.

Broadband Adoption Account -- \$20 million

\$17.5 million awarded Supporting 232 projects serving 307,530 participants in 29 counties.

Tribal Assistance Program – up to \$5 million

\$1,541,550 Awarded – Supporting **27 projects** for 13 Tribes to provide technical assistance in developing market studies, feasibility studies, and/or business plans which support Tribes in their pursuit of improved communications.

AB 1665 changed program eligibility and introduced a number of key changes including:

- ☐ New Program Accounts and New Monies
 - Infrastructure Grant Account \$300 million
 - Line Extension \$5 million included
 - Will not issue any new loans under the Loan Account.
 - Consortia Account \$10 million
 - Adoption Account \$20 million

The Commission adopted final program rules for the Infrastructure, Adoption, Public Housing and Consortia accounts. A proposed decision is under consideration by the Commission for the Line Extension Account.

Wireline and Fixed Wireless Broadband Availability as of December 31, 2019

Speed Benchmarks (Mbps)	Percentage of Total Households with Broadband Availability			Unserved Households				
				Number of Unserved Households			Percentage of Unserved Households	
	Urban	Rural	Statewide	Urban	Rural	Statewide	Urban	Rural
>=6/1	98.0%	82.7%	97.2%	252,604	119,143	371, 747	2.0%	17.3%
>=25/3	97.8%	73.8%	96.5%	281,507	180,922	462,4 29	2.2%	26.2%
>=100 down	97.5%	48.7%	94.9%	320,504	354,226	674,7 30	2.5%	51.3%

State operations constitute approximately 4.9% of total program FY 2017-18 budget.
A list of consortia regions and CASF Annual Reports are available at <http://www.cpuc.ca.gov/casf/>.
*The Public Housing Account is no longer accepting applications for grant funding.



Last updated: 7/20/2021 3:51 PM

Source: California Public Utilities Commission California Advanced Services Fund (CASF) website: <https://www.cpuc.ca.gov/casf/>

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Implementation Research and Interviews

Online research was conducted to identify agencies that have successfully implemented programs that advanced broadband installation in their communities. Three agencies were selected based on this research for one on one interview. The three agencies selected include: City of Loma Linda, City of Rancho Cucamonga and South Bay Cities Council of Government. Details of the research on these agencies and the results of the one on one interviews are provided in this section.

Loma Linda Connected Community

The City of Loma Linda is located in San Bernardino County and is home to Loma Linda University and Medical Center. Known for its neonatal intensive care unit, cancer research and treatment, and transplant center, the Loma Linda Medical Center is one of the largest research hospitals in Southern California and is a critical part of the economic fabric of the City.

Through the interview with City staff it was determined that Loma Linda was in an internet void: AT&T did not come into the City with its broadband service, but provided service around the City. While Verizon was rolling out their Verizon FiOs in the region, they would not bring the FiOs into Loma Linda due to AT&T presence around the City. As a result, the City began investigating building a self-reliant fiber network (ultimately a cloverleaf design with four redundant loops) in the City that would connect all municipal and safety building together. These rings would then have spare or dark fibers that could be leased by internet service providers to connect residences and businesses to the fiber optic network.

The Loma Linda Connected Communities program was initiated in 2002 and as of 2021 Phase 1 Network Operations Center and preliminary fiber backbone was substantially complete. The Phase Two fiber backbone will encircle the south-east quadrant of the City. Phases Three and Four will feed the north-west and south-west quadrants respectively. The precise timing of the deployment of the three remaining rings will be primarily determined by the interest level of the residents and businesses in those areas.

Loma Linda was successful in their deployment of citywide broadband through a cooperative agreement between the City and private development. All new commercial and residential development is now required to include fiber optics interface and cabling, and redevelopment involving more than 50% of the structure is held to the same requirement. Dig once policies and modifications to the City building code ensure that the infrastructure is placed in the ground when other public utilities are repaired or installed and in place when buildings are constructed or largely remodeled. These policies and the implementation of the citywide network put Loma Linda on the map as a model for future deployment of citywide high speed broadband internet.

Rancho Cucamonga Municipal Broadband

In 2016 City of Rancho Cucamonga worked with a developer to resolve a fiber connectivity issue. The developer wanted to bring high speed internet to a building they owned, but the local internet service provided wanted over \$30,000 for the installation of the fiber to the building. The City had fiber optic cabling and conduit throughout the City, with spare strands of fiber available. The City saw this issue as an economic opportunity to lease the dark fiber to fill the gaps in the communications system.

Recognizing the opportunity, the City prepared a Fiber Master Plan that provided a roadmap for providing citywide fiber optic broadband internet. Rancho Fiber is currently being offered to new developments where the fiber optic infrastructure has been installed during construction. As Phase 1 of the Fiber Optic Master Plan progresses, the City will be utilizing its existing 70 miles of fiber optic cable

and/or associated conduits to fill network gaps where more business commercial areas and existing residential areas may be added.

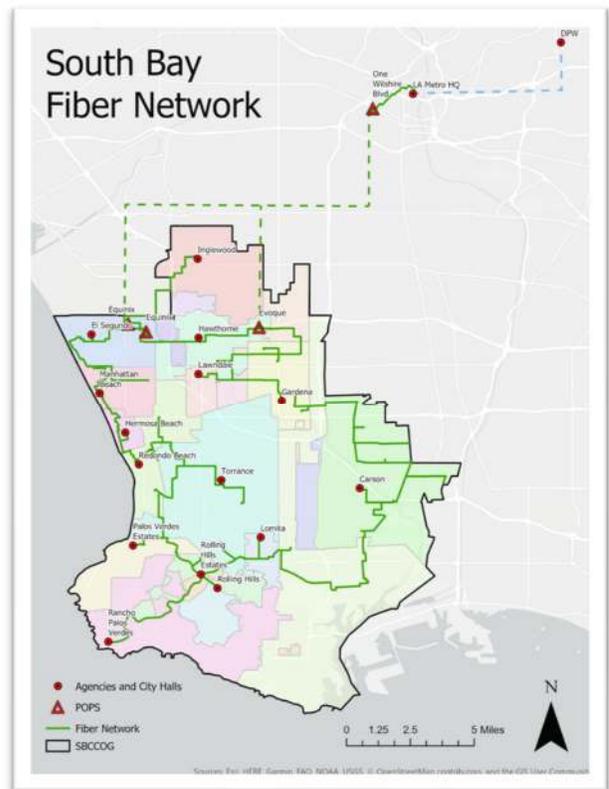
The City is currently partnering with Onward for their internet service. Onward leases dark fiber from the City and provides high speed broadband internet service to both residential and commercial uses in the City. The City is responsible for maintaining and constructing the physical infrastructure in the City. The system is managed and maintained by the City's utility department.

South Bay Fiber Network

The need for high speed broadband internet service began as an economic development issue when a large employer in the City of Torrance left for another state because of the lack of high speed, reliable internet service. The South Bay Workforce Investment Board and one of the Los Angeles County Supervisors provided seed funds to assess the issue in 2017 and the region prepared the South Bay Broadband Master Plan. The plan outlined the need for a high-speed capacity broadband network that would allow the South Bay cities to embrace the digital economy, smart city initiatives, integrated utilities and next-generation economic development. Planning for these initiatives was a necessity to remain competitive and differentiate the South Bay as a technology-savvy place to live, work, play and learn. The master plan provided a detailed blueprint for broadband and technology infrastructure to keep the South Bay at the forefront of the digital economy.

As of August 2020, South Bay Cities Council of Governments (SBCCG) has an operational Municipal Giga Byte Network call the South Bay Fiber Network (SBFN), which has connected 15 cities and 37 municipal sites. To fund the project, the South Bay Cities submitted a funding request for \$4.4 billion in Measure M (transportation tax) funds in September 2019. Because officials were asking for transportation funding, the project leaders needed to establish a transportation component. South Bay officials and the Metro (Transportation Authority) agreed to connect the fiber-optic ring to traffic collection centers and traffic monitoring programs operated by the Metro, Los Angeles County, Manhattan Beach, and Torrance.

The cities later received an additional \$2.5 million in additional Measure M funding, as well as \$1.2 million from the state. The network includes series of fiber optic rings that allows for redundancy and reduces potential down time. Each of the member agencies have at least one site connected to the fiber optic ring. To date a total of 37 municipal site are connected, which includes connectivity to Metro stations, West Basin Water District, Beach Cities Health District, Lundquist BioMedical Insititute, South Bay Workforce Investment Board (7 locations), and Los Angeles County Department of Public Works.



SBCCOG leases the dark fiber on the network to an outside vendor (American Dark Fiber). American Dark Fiber maintains the fiber optic network and contracts with an internet service provider (Race Communications) that provides internet to the cities and the public. Monthly recurring costs for service and/or transport circuits are covered by the respective agency.

Additional On-Line Research

According to Connect California, there are 17 municipal agencies that provide broadband in the state of California as of January 2022. Facts provided by Connect California:

- ✓ There are 332 total municipal broadband networks in the US, with only 63 of those offering Fiber to the Home internet service for residential use.
- ✓ The majority of municipal broadband networks in California are based in dark fiber owned by the city. Only 2 of the 17 municipal providers in California are utility co-ops: Connect Anza, and Plumas-Sierra Telecommunications.
- ✓ Only 6 of the 17 municipal broadband providers in California offer residential services, with 3 offering FTTH (Fiber to the Home) service in the last mile. The rest focus on enterprise and business services, or are exclusive to municipal services and anchor institutions like hospitals, libraries, and schools.

The box to the right is a list of agencies that provide municipal broadband services to residential and/or business partners. The following is a summary of a select group of agencies where information about their program was available

City of Beverly Hills

Fiber to the Premise program began in 2014 and aimed to provide broadband services to residents and businesses throughout the City. The program will provide one Gigabit-per second internet speeds to residents for about \$50 per month. Voice and video services (phone and television) will also be available as add-on services. As of 2020, the City was in the process of installing fiber optic cabling citywide and is anticipated to roll out services in 2022.

California Municipal Broadband Providers:

- ✓ Beverly Hills (late 2022)
- ✓ Burbank Water and Power
- ✓ City of Anaheim
- ✓ City of Shafter
- ✓ Connect Anza
- ✓ Culver Connect
- ✓ Loma Linda Connected Community
- ✓ City of Long Beach
- ✓ Palo Alto Fiber
- ✓ City of Pasadena
- ✓ Plumas-Sierra Telecommunications
- ✓ Riverside Dark Fiber Network
- ✓ San Bruno Municipal Cable TV
- ✓ City of Santa Clara
- ✓ Santa Monica City Net
- ✓ Truckee Donner Public Utility
- ✓ Vernon Light & Power

City of Anaheim

Anaheim Public Utilities operates a fiber optics network to control and monitor its water and electric systems and provide connectivity for municipal services. The fiber network has spare capacity that broadband service providers can lease to provide high-speed internet access to their customer in Anaheim.

In addition, major cell phone companies (AT&T, Verizon, and T-Mobile) are working to improve service for their customers in the City. As part of these improvements, they are replacing some of the streetlight poles to allow installing their wireless equipment inside an enclosure at the top. These installations are referred to as Small Cell Sites. To streamline the process, Anaheim Public Utilities has adopted a standard license agreement and wireless-ready streetlight poles.

Culver Connect

Culver Connect is a municipal fiber network facilitating high speed data connectivity to Culver City businesses in order to promote economic development. In 2013 the City began consulting with the Culver City business community about their need for enhanced broadband connectivity. The City then completed a high-level network design and evaluated potential business models. In 2015, the City Council approved funding for the design and construction of a Municipal Fiber Network. Construction of the network was completed in July 2018. Culver City now has a 21.7 mile network backbone in three geographical network rings interconnected by “ring ties” of approximately 3.1 route miles of fiber. The network backbone is comprised of 576 strands of entirely undergrounded fiber. There are three hub facilities located in the city which house city-owned network electronics. The City leases two fiber connections to carrier hotels at One Wilshire in Los Angeles and Equinix (LA3) in El Segundo.

City of Pasadena

The City of Pasadena owns and operates approximately 50 miles of fiber network, which supports City business and transportation operations. Currently the system provides the foundation for a variety of business-oriented services that the City offers currently and plans to expand in the future. For businesses seeking to connect multiple facilities within Pasadena, the City offers either dark fiber leases or lit services between locations within Pasadena. Currently the City does not provide service in residential areas.

Riverside Dark Fiber Network

Riverside Public Utilities offers dark fiber leases on its 120-mile network, which connects office buildings, industrial properties and data centers, and serves 5G-ready sites throughout the city limits. Internet service providers or wireless operators can lease fiber and use it to deliver connectivity to customers, and businesses can use it to create their own wide area enterprise networks. More locations will be added, with the goal of making dark fiber connections available to industrial and commercial customers everywhere in Riverside. The program does not currently include residential service.

Santa Monica CityNet

For more than two decades City of Santa Monica has been constructing a citywide fiber optic network that has connected civic facilities and businesses. In 2015, the City embarked on their Digital Inclusion Pilot Program, which connected ten affordable housing projects to the City’s fiber network. Since this pilot program began the City has continued to connect low income, high density residential projects to the fiber network.

Additional Resources:

Rural Oregon projects: <https://www.oregon4biz.com/Broadband-Office/Rural-Broadband-Capacity-Program/>

Arizona Initiatives (see PDF page 39 for AZ examples and page 40 for other case studies): https://azlibrary.gov/sites/default/files/erate_2018_az_broadbandstrategicplan_final.PDF

<https://www.azcommerce.com/broadband/grant-opportunities/>

California State Action Plan: <https://broadbandcouncil.ca.gov/action-plan/>

SCAG resolution and Draft Broadband Policy: <https://calcog.org/scag-commits-to-broadband-for-underserved/>

California Association of Councils of Governments resources: <https://calcog.org/broadband-resources/>

Summary & Conclusions

If you have any questions pertaining to the findings summarized in this memo, please call Dawn at (760) 603-6266.

Sincerely,

Dawn Wilson,
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Transportation Planning