



City of Jurupa Valley

Staff Report

DATE: FEBRUARY 19, 2026
TO: HONORABLE MAYOR AND CITY COUNCIL
FROM: ROD BUTLER, CITY MANAGER
BY: JOE PEREZ, ASSISTANT CITY MANAGER / COMMUNITY
DEVELOPMENT DIRECTOR
SUBJECT: AGENDA ITEM NO. A

A PUBLIC HEARING TO CONSIDER AN APPEAL (MA25133, AP25002) TO THE CITY COUNCIL OF THE PLANNING COMMISSION'S DENIAL OF CAMINO TERRACE APARTMENTS PROJECT (MA24164, SDP24074), AN 80-UNIT AFFORDABLE HOUSING PROJECT CONSISTING OF 28 SUPPORTIVE HOUSING UNITS, 51 AFFORDABLE HOUSING UNITS, ONE MANAGER'S UNIT, A 2,560-SQUARE-FOOT COMMUNITY BUILDING, AND A 6,463 SQUARE-FOOT CHILDCARE CENTER LOCATED AT THE NORTHEAST CORNER OF CAMINO REAL AND LIMONITE AVENUE, AND NORTHEAST CORNER OF CAMINO REAL AND CANYON TERRACE DRIVE, ASSESSOR'S PARCEL NUMBERS 185-460-001, 185-470-001, 185-470-002; APPLICANT: WAKELAND HOUSING AND DEVELOPMENT CORPORATION

RECOMMENDATION

It is recommended that the City Council conduct a public hearing and provide direction as follows:

- 1. Direct staff to prepare and return with a Resolution upholding the denial** of Master Application No. 24164 (Site Development Permit No. 24074) for the Camino Terrace Apartments Project, an 80-unit affordable and supportive housing development located on a 5.88-acre site along the northeast corner of Camino Real and Limonite Avenue; or
- 2. Direct staff to prepare and return with a Resolution approving the Project** with appropriate findings, waivers, and conditions.

BACKGROUND

Director's Action and Planning Commission Appeal and Decision

On February 13, 2025, the project was denied under a Director's Action. On April 28, 2025, the Planning Commission considered an appeal of the Director's Action and upheld the denial.

City Council Appeal Hearing and Initial Continuance

On June 26, 2025, the City Council held a duly noticed public hearing on the appeal and received public comments. The Council requested additional information regarding project safety and acknowledged a second letter from the California Department of Housing and Community Development (HCD) regarding a potential notice of violation. The hearing was continued to August 7, 2025 to allow sufficient time to evaluate the matter and ensure comprehensive review of all relevant information. The August 7 hearing constituted the third of the five meetings permitted under the Housing Accountability Act.

Continued City Council Hearing and Additional Direction

On August 7, 2025, the City Council held a continued public hearing and received comments from the applicant and the public. The applicant noted a \$600,000 commitment for sidewalk installation along the project frontage and identified challenges with undergrounding utilities. The Council requested continued discussions with the applicant and additional information regarding potential blasting during construction and the need for emergency generators. The hearing was continued to September 18, 2025, with the hearing remaining open for further review. The August 7, 2025 staff report is attached to this item and may be referenced for additional information on the project.

Applicant Requested Hearing Deferrals and Renoticing

At the applicant's request, the City Council did not conduct public hearings on September 18, October 16, or November 20, 2025, and the item was rescheduled and renoticed for December 18, 2025, which constituted the fourth of five hearings permitted under the Housing Accountability Act. At that hearing, the City Council requested additional clarification regarding public safety, access and parking, fire protection and insurance considerations, utility undergrounding, and the treatment of the northern parcel.

Final Continued City Council Hearing

To allow time for revisions and public review of updated materials, the City Council continued the hearing to February 19, 2026, which will serve as the final continued hearing on the project.

PROJECT STATUS

At the December 18, 2025, public hearing, the City Council requested additional clarification and updates regarding project design and safety, density and State law compliance, the role of the



northern parcel, traffic and pedestrian circulation, utility undergrounding, emergency preparedness, construction impacts, and overall consistency with State housing laws. Since that hearing, the applicant has submitted additional materials, including a revised site plan, and staff has coordinated with the City Attorney and other departments to address the City Council's questions, as summarized below.

Updated Site Plan and Project Layout

The applicant has submitted an updated site plan that provides a redesigned layout for the project. The revised plan removes all development from the northern portion of the site (between Canyon Terrace Drive and Lakeside Drive) and consolidates all housing units and supportive services on the southern portion of the property (between Canyon Terrace Drive and Limonite Avenue). This redesign eliminates the need for residents to cross Canyon Terrace Drive, thereby reducing potential pedestrian safety concerns.

In addition, the updated site plan incorporates ADA-accessible ramps, revised sidewalk connections, enhanced pedestrian crossings, a consolidated central laundry facility, supportive services/community building, and updated screening and wall treatments along the commercial property line. These revisions were submitted in direct response to City Council direction and public comments received during prior hearings.

Density Bonus Law Compliance

The City Attorney confirmed that the applicant's revised density calculations comply with Government Code Section 65915. Based on that review, the project qualifies for an automatic density bonus.

Because 100 percent of the residential units (excluding the manager's unit) are restricted to lower income households, the project qualifies for an 80 percent density bonus under Government Code Sections 65915(b)(1)(G) and 65915(f)(3)(D). Applying the 80 percent density bonus results in a maximum allowable density of 87 units. The proposed 80 units are therefore within the density permitted under State Density Bonus Law.

Under the applicant's revised site plan, no development is proposed on the northern parcel, and the applicant has stated that the area would remain vacant and undeveloped. The applicant has further indicated that the Riverside County Housing Authority, which owns the property, is open to the dedication of the northern parcel as open space or conservation land, and the applicant has expressed interest in partnering with a land conservation or stewardship organization for long-term management of the northern parcel.

Traffic, Pedestrian Circulation, and Sidewalk Improvements

The revised site plan consolidates development on the southern portion of the site, which reduces pedestrian conflicts and eliminates the need for residents to cross Canyon Terrace Drive for on-



site services. The applicant has also committed to installing sidewalks as shown in Exhibit 1. These sidewalks are intended to directly benefit residents by providing connections to nearby commercial uses and public transit.

EXHIBIT NO. 1 - SIDEWALK INSTALLATION



Driveways

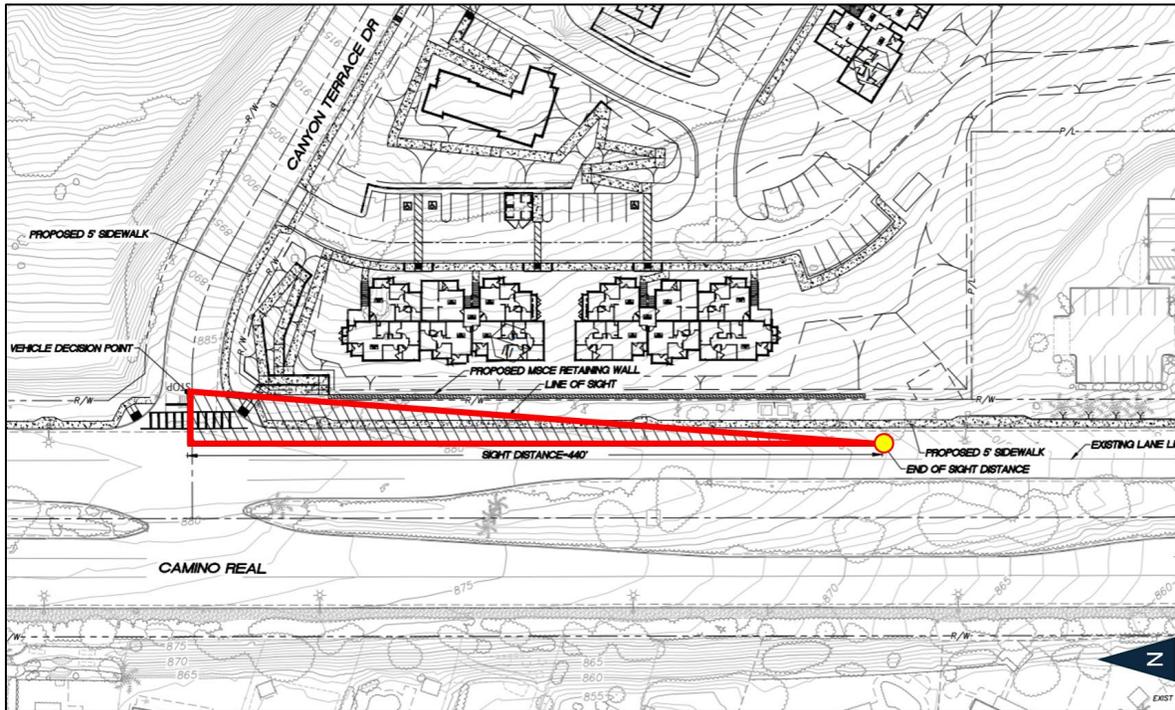
According to the applicant’s civil engineer, there is no industry or building code standard that limits driveway cross slope. Similar driveway conditions on sloped roadways have been approved and operate safely in the surrounding area, including along Helcrest Drive, Winncliff Drive, and Lakeside Drive. While those driveways serve single-family homes, the vehicular turning movements are comparable. Safety is further improved by the project design, as vehicles will not be required to back out onto Canyon Terrace Drive.

Corner and Sight Distance

The applicant stated that the retaining wall would not create a blind corner, as the wall is located on the left side of a vehicle turning right from Canyon Terrace Drive, while oncoming traffic approaches from the right. In addition, the wall is set back approximately 20 feet from Camino Real and approximately 80 feet from the Canyon Terrace travel lane, providing an estimated 440 feet of visibility to the south, which exceeds typical stopping distance needs and does not diminish intersection safety. Exhibit 2 demonstrates the sight distance analysis.



EXHIBIT NO. 2 – CORNER AND SIGHT DISTANCE ANALYSIS



Backup Generators and Emergency Preparedness

The applicant has committed to installing a backup generator for the proposed community room at an estimated cost of \$200,000. The generator would support refrigeration for medications, device charging, and a cooling area during power outages, providing a centralized resource for residents during emergencies.

Use of Explosives During Construction

The applicant has stated that they cannot agree to a condition prohibiting the use of explosives since blasting may be necessary due to site conditions and that there are no City regulations prohibiting its use. The applicant has indicated that if blasting is required, the general contractor would take precautions to protect adjacent properties and maintain appropriate insurance coverage to address any potential damage. Blasting activities would be subject to applicable permitting and oversight requirements from relevant regulatory agencies.

Undergrounding of Utilities

The applicant states that the estimated \$1.2 million cost would be financially burdensome if required as a construction obligation but will agree to a condition of approval requiring a one-time payment of \$ 1.2 million dollars to satisfy the undergrounding requirement. Staff is currently discussing possible text for a condition of approval that would establish a one-time payment. The



City maintains that Jurupa Valley Municipal Code Section 7.50.010 applies to both subdivision and non-subdivision projects involving frontage improvements and that the requirement was communicated early in the review process.

Fire Safety, Driveways, Site Access, and Fire Insurance

The Riverside County Fire Department reviewed the project and issued Planning Case Conditions dated June 23, 2025, confirming that the site is designed to meet applicable fire and life-safety requirements. Fire apparatus access, including driveways used for emergency response, must comply with California Fire Code and County standards governing grade, cross-slope, turning radii, structural capacity, and building proximity. The project is required to provide adequate fire access within 150 feet of all buildings, approved turnarounds where applicable, secondary access as required, and verified fire flow, hydrant spacing, and fire-protection systems. While the Fire Department does not regulate insurance matters, compliance with adopted fire access and protection standards is a key factor in fire-risk evaluation, and the Fire Department’s review indicates that safe and reliable emergency access can be provided.

HCD Correspondence and State Housing Law Compliance

On June 24, 2025, HCD issued a Notice of Potential Violation stating that the Planning Commission’s denial appeared inconsistent with State housing laws and required legally sufficient findings under the Housing Accountability Act. HCD also identified potential issues related to AB 2162, the State Density Bonus Law, Affirmatively Furthering Fair Housing, Government Code Section 65008, and the City’s Housing Element commitments, and clarified requirements related to on-site services, including childcare. Staff has considered this correspondence in evaluating the project and preparing the continued hearing materials.

Property Ownership and Exclusive Negotiation Agreement

The property is owned by the Riverside County Housing Authority, which acquired the site in 2016. The site is subject to an Exclusive Negotiation Agreement (ENA) with Wakeland Housing and Development Corporation. The ENA grants Wakeland exclusive rights to negotiate with the Housing Authority regarding development of the site and assigns responsibility for securing entitlements and approvals.

The ENA has been extended by mutual agreement, with the current extension continuing the negotiation period through November 6, 2026. Under the extension, the parties will continue working toward a Disposition and Development and Loan Agreement, and all prior amendments to the ENA remain in effect.

UPDATED PROJECT DESCRIPTION

With the revised site plan, the proposed 80-unit affordable and supportive housing development is now located only on the 5.88-acre southern parcel situated along the east side of Camino Real and



south of Canyon Terrace Drive. The updated site plan removes all development, including the childcare facility, from the 9.65-acre northern parcel, which will remain undeveloped, thereby eliminating the need for residents to cross Canyon Terrace Drive for services or amenities.

All residential buildings, supportive services, community facilities, and on-site amenities have been consolidated onto the southern parcel. The revised layout includes six multi-story multifamily buildings containing 28 supportive housing units, 51 affordable units, and one manager's unit, along with associated parking, circulation, and open space. The supportive services building and community room (approximately 2,200 square feet), central laundry building, and outdoor amenities, including a children's play area, patios, and landscaped open space, are also located within the southern site. A total of 74 parking spaces, including EV-ready and accessible spaces, are provided.

The updated design maintains the overall architectural character of the earlier proposal, featuring stucco finishes, panel accents, and pedestrian-oriented entries. All required pedestrian improvements, including new sidewalks along Camino Real and Canyon Terrace Drive, are incorporated into the frontage.

The Applicant continues to seek ministerial approval as a supportive housing development under California Government Code Sections 65650 et seq. See Exhibit 3, Project Site, for project location and Exhibit 4, Revised Site Plan, for the updated development layout.



EXHIBIT NO. 3 – ORIGINAL PROJECT SITE



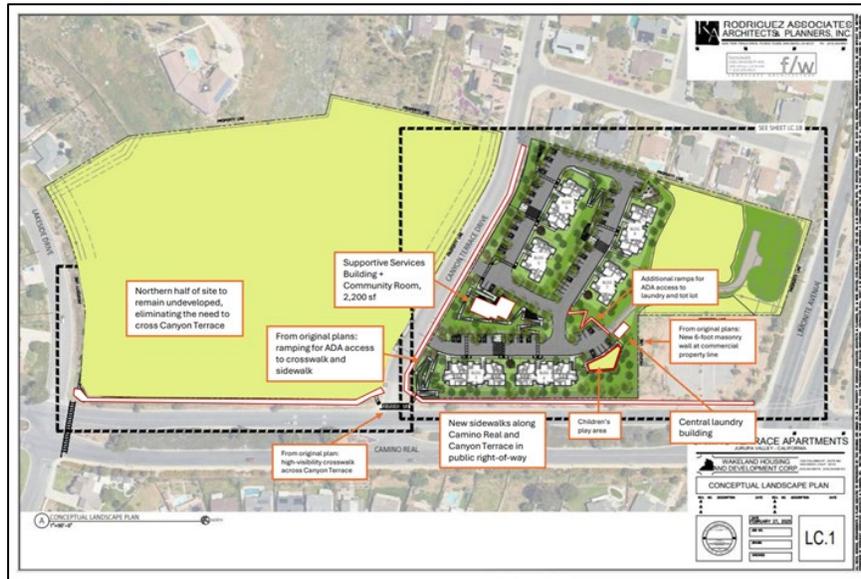
EXHIBIT NO. 4 – REVISED PROJECT SITE



EXHIBIT NO. 5 – ORIGINAL SITE PLAN



EXHIBIT NO. 6 – REVISED SITE PLAN



APPLICATIONS FOR PROJECT

The proposed project requires several approvals. The Applicant sought approval under the ministerial approval process for qualifying supportive housing projects under California Government Code Section 65650 *et seq.*, as well as approval of a Density Bonus application.

Key Entitlements Required:



- **Site Development Permit – Supportive Housing Application (SDP)** – Required for the project’s approval as a by-right development under Government Code Section 65651 and 51 affordable housing units.
- **Density Bonus Application** – Incentives, concessions and waivers were requested under State Density Bonus Law to modify development standards, including setbacks, parking, and open space requirements.

SUPPORTIVE HOUSING ELIGIBILITY AND STATE LAW REQUIREMENTS

Per the Applicant’s request, the application is being processed as a supportive housing project under California Government Code Section 65651, which allows qualifying developments to be approved ministerially in zones that permit multifamily housing. To qualify, the project must meet specific criteria, including:

- Dedicating 100% of its units (excluding the manager’s unit) to lower income households.
- At least 25% of the units or 12 units, whichever is greater, are restricted to residents in supportive housing who meet criteria of the target population.
- A recorded affordability restriction for 55 years; and
- Providing on-site supportive services for use by the residents in the project.

To receive the ministerial approval process, State law requires that a certain amount of space be included in the project for on-site services [Gov. Code Section 65651(a)(5)] and that the “plan for providing supportive services” must include “documentation demonstrating that supportive services will be provided on-site to residents in the project, as required by Section 65651” (Gov. Code Section 65652). Additionally, supportive housing developments must comply with objective zoning and development standards that apply to other multifamily developments within the same zone.

Density Bonus Eligibility, Waivers, Incentives, and Concessions

As an affordable housing project, the development is eligible for various benefits under California Density Bonus Law (Government Code Section 65915). This eligibility grants projects that dedicate all units to lower-income households (excluding the manager’s unit), to an automatic 80% density bonus, allowing the developer to exceed the base zoning density. The applicant is not seeking an increase in density.

Additionally, the project qualifies for waivers of development standards if adherence to local development standards would physically preclude the project from achieving its permitted density, including any density bonus. State Density Bonus Law also allows an applicant to obtain concessions or incentives, including regulatory incentives or concessions that result in identifiable and actual cost savings to a project. They are requesting waivers and concessions.



PROJECT LOCATION AND SURROUNDING AREA

The proposed project is located on a 5.88-acre site at the northeast corner of Camino Real and Limonite Avenue in the City of Jurupa Valley.

The project site has a General Plan land use designation of Medium High Density Residential (MHDR), which allows for single-family attached and detached residences at a density of 5 to 8 dwelling units per acre. It is zoned R-3 (Multifamily Residential) and is part of the Mission De Anza Specific Plan (SP123), Planning Area 11, which permits multifamily development.

The surrounding area consists primarily of single-family residential neighborhoods, with commercial (e.g., 123 Smile Dental Care) and open space uses nearby. Additionally, the site is within Zone E of the Riverside Municipal Airport Influence Area, requiring compliance with additional safety regulations.

EXHIBIT NO. 7 - GENERAL PLAN LAND USE, MHDR (5-8 DU/AC)



EXHIBIT NO. 8 - ZONING, GENERAL RESIDENTIAL (R-3 ZONE)



PROJECT DESIGN AND SITE LAYOUT

The southern portion (5.88 acres) consists of six multi-story multifamily residential buildings, including 28 supportive housing units, 51 affordable housing units, and one manager's unit. Outdoor features of the southern portion include a play areas and multiple landscaped patios.

Parking is provided through 74 spaces allocated to the residential area, including accessible and electric vehicle parking.

The architectural design incorporates low-pitched gabled roofs, stucco walls, and panel accents, with a layout that includes a combination of indoor and outdoor spaces. The following is a summary of the project.

Summary Design and Site Layout Features:

- Southern Portion (5.88 acres) – Residential Area:
 - o Buildings: Six multi-story multifamily buildings with 80 total units.
 - o Unit Mix: 42 one-bedroom (593 sq. ft.), 20 two-bedroom (690–707 sq. ft.), and 18 three-bedroom (1,012 sq. ft.).
 - o Outdoor Features:
 - Four landscaped patios.
 - o Parking: 74 spaces, including accessible and EV spaces.
- Architectural and Site Features:
 - o Building Design: Low-pitched gabled roofs with stucco and panel accents.
 - o Pedestrian Access: Internal walkways connecting residential units to amenities.
 - o Landscaping: Tree-lined walkways and landscaped areas.
 - o Lighting and Security: Common areas include lighting and other safety measures.

ARCHITECTURE, AND WALLS/FENCES

Architectural Style and Building Heights

The project consists of multi-story residential buildings, with some structures reaching two stories and others three stories. The design incorporates low-pitched gabled roofs, stucco walls with panel accents, and symmetrical windows. The building massing is rectangular, with balconies on upper levels and arched entryways on ground floors.



EXHIBIT NO. 9 - RESIDENTIAL BUILDING AND COMMUNITY BUILDING



EXTERIOR ELEVATION 1

BUILDING TYPE IV

SCALE 1/8" = 1'-0"

Walls and Retaining Structures

The project includes a substantial retaining wall along Camino Real, reaching 18 feet in height in certain sections. This height exceeds the City's standard for walls near the right-of-way, and the applicant is requesting a waiver to allow for this deviation. Additionally, the applicant has agreed, through conversations with the city, to install perimeter walls as required by the Municipal Code, particularly along property boundaries adjacent to commercial areas.

REQUESTED WAIVERS, INCENTIVES, AND CONCESSIONS

As an affordable housing project, the applicant is utilizing California Density Bonus Law (Government Code Section 65915) to request concessions, incentives, and waivers to modify certain development standards and City requirements. The applicant and the City have continued to make progress on the project; however, the following waivers, incentives, and concessions may still be necessary to proceed toward approval. The following waivers may only be granted if the City Council determines that strict compliance would physically preclude the project from achieving its permitted density or would result in identifiable cost reductions.



EXHIBIT NO. 10 - WAIVERS, INCENTIVES, AND CONCESSIONS

#	Section Number	Description of Comment	Waiver Required
1	9.240.110	Minimum dwelling size: 42 units are 593 sq. ft. below the 750 sq. ft. minimum	Waiver
2	9.240.120(6)(a)(i)	Parking space is located within 3 feet of the property line which is less than the 3 feet minimum from property line	Waiver
3	9.240.120(6)(a)(i)	Driveway setback is less than the 30 feet minimum from the property line.	Waiver
4	9.240.120(6)(d)	No bicycle parking is provided (3 racks required).	Waiver
5	9.240.120(7)(f)(i)(g)	Trees planted within 10 feet of driveways (conflicts with setback).	Waiver
6	9.240.545(B)(1)	Private open space below required 115 sq. ft. (ground floor) and 75 sq. ft. (upper floors).	Waiver
7	9.240.545(B)(2)	Common open space provided (3,742.69 sq. ft.) below 12,000 sq. ft. required.	Waiver
8	9.240.545(B)(3)	Laundry: no in-unit hookups; one common laundry room provided on site.	Waiver
9	9.240.545(B)(4)	Accessory storage (35–60 cu. ft.) not provided.	Waiver
10	9.240.545(B)(5)	Parking management plan has not been submitted (assignments, enforcement, CC&Rs).	Waiver
11	9.240.545(11)(a)	Building height/upper-story setback transition.	Waiver
12	9.240.545(7)(d)	Retaining wall along Camino Real, approx. 18 ft.	Waiver
13	9.240.545(6)(b)	Street-frontage tree spacing does not meet the 30-ft interval requirement.	Waiver
14	9.80.030(4)	Lot coverage exceeds 50% maximum (approx. 51.2%).	Waiver
15	7.50.010	Undergrounding of utility lines along the frontage of the project site.	Waiver



CITY COUNCIL ADVISORY ON REQUIRED FINDINGS FOR DENIAL OF PROJECT

Government Code Section 65589.5(d) provides that for a housing development project for very low, low-, or moderate-income households, a local agency shall not disapprove the housing development project, or condition approval in a manner that renders the housing development project infeasible, including through the use of design review standards, unless it makes one of the following written findings, based upon a preponderance of the evidence in the record:

The housing development project, as proposed, 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 without rendering the development unaffordable to low- and moderate-income households. (Gov. Code Section 65589.5(d)(2)).

The denial of the housing development project or imposition of conditions is required in order to comply with specific State or Federal law, and there is no feasible method to comply without rendering the development unaffordable to low- and moderate-income households. (Gov. Code Section 65589.5(d)(3)).

On the date an application for the housing development project was deemed complete, the jurisdiction had adopted a revised housing element that was in substantial compliance with this article, and the housing development project was inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation as specified in any element of the general plan. (Gov. Code Section 65589.5(d)(5)).

A "specific, adverse impact" means "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete." Gov. Code Section 65589.5(d)(2). Inconsistency with the zoning ordinance or general plan land use designation does not constitute a "specific, adverse impact" for these purposes. The City Council may only deny the project if it makes the requisite findings identified above.

ENVIRONMENTAL REVIEW (CEQA COMPLIANCE)

The project is exempt from environmental review under the California Environmental Quality Act (CEQA) because, pursuant to CEQA Guidelines Section 15270, CEQA does not apply to projects which a public agency rejects or disapproves.

In the event the project is approved, it would be exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15268, as the project would be approved through a ministerial process with no discretionary decision-making authority.



Notably, the applicant has submitted environmental technical studies for the record, including a Biological Resources Report (dated May 30, 2024), a Cultural Resources Report (dated October 2022), a Fire Protection Plan (dated March 17, 2022), and an Airport Land Use Commission Director’s Determination (dated December 30, 2024).

NOTICING REQUIREMENTS

Public hearing notices were mailed to property owners within 1,000 feet of the project site on February 8, 2026, and a legal advertisement was published in the Press Enterprise on Sunday, February 8, 2026. The City has received numerous comments from the surrounding neighborhood, and the project has previously generated public input from nearby residents.

FINANCIAL IMPACT

The applicant paid for the processing of the project appeal. It will have no effect on City costs or revenues.

ALTERNATIVES

1. *Recommended Action:* Direct staff to return with a Resolution denying the appeal and upholding the Planning Commission’s decision to affirm the ministerial denial of the Camino Terrace Apartments Project (Master Application No. 24164, Site Development Permit No. 24074), an 80-unit affordable and supportive housing development proposed on a 5.88-acre site along the northeast corner of Camino Real and Limonite Avenue. A Resolution containing final written findings will be returned at a future City Council meeting; or
2. Direct staff to prepare a Resolution approving the appeal of the Planning Commission’s decision and approving the proposed Camino Terrace Apartments Project. A Resolution and conditions of approval will be returned for City Council consideration at a future meeting.



Prepared by:



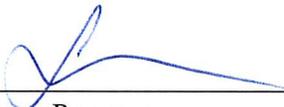
Joe Perez
Assistant City Manager/Community
Development Director

Submitted by:



Rod B. Butler
City Manager

Reviewed by:



Susan Paragas
Director of Finance

Reviewed by:



Michael Flad
Assistant City Manager

Reviewed by:



Peter M. Thorson
City Attorney



ATTACHMENTS

1. Adopted Resolution No. PC-2025-06
2. Project Plan Set (Architectural, Civil, and Landscape Plans)
3. Appeal of Director's Action to Planning Commission
4. Appeal of Planning Commission Decision to City Council
5. Project Review Correspondences
6. Letter from Housing and Community Development (HCD) (June 24, 2025)
7. Updated Site Plan
8. August 7, 2025, Staff Report without attachments



ATTACHMENT NO. 1

Resolution No. PC-2025-06

RESOLUTION NO. PC-2025-06

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF JURUPA VALLEY UPHOLDING THE COMMUNITY DEVELOPMENT DIRECTOR'S DENIAL OF CAMINO TERRACE APARTMENTS PROJECT (MA24164, SDP24074) AN 80-UNIT AFFORDABLE HOUSING PROJECT CONSISTING OF 28 SUPPORTIVE HOUSING UNITS AND 51 AFFORDABLE HOUSING UNITS, A MANAGER'S UNIT, A 2,560 SQUARE FOOT COMMUNITY BUILDING, AND 6,463 SQUARE FOOT CHILD DAYCARE CENTER LOCATED ON THE NORTHEAST CORNERS OF CAMINO REAL AND LIMONITE AVENUE AND CAMINO REAL AND CANYON TERRACE DRIVE, AND MAKING A FINDING OF EXEMPTION UNDER CEQA GUIDELINES SECTION 15270(A) (MA25054, AP25001)

THE PLANNING COMMISSION OF THE CITY OF JURUPA VALLEY DOES RESOLVE AS FOLLOWS:

Section 1. Project. Wakeland Housing and Development Corporation ("Wakeland") applied for a Site Development Permit (SDP24074) to construct an 80-unit affordable housing project consisting of 28 supportive housing units, 51 affordable housing units, 1 manager's unit, a 2,560 square foot community building, and 6,463 square foot child daycare center at the northeast corner of Camino Real and Limonite avenue, identified as Assessor's Parcel Numbers 185-460-001, 185-470-001, 185-470-002 (the "Project"). Wakeland also submitted a Density Bonus Application to seek a waiver of certain development standards including a waiver of landscaping, private open space, parking setback, pedestrian access, retaining wall height, perimeter walls, and unit size requirements. Wakeland also sought an incentive to provide a shared laundry facility instead of washer/dryer hookups. Wakeland sought approval as a ministerial supportive housing development under California Government Code Sections 65650 *et seq.*

Section 2. Appeal.

(a) Jurupa Valley Municipal Code Section 9.05.105 provides that any person seeking to appeal the decision of the Community Development Director to either approve or deny a housing development project that is subject to ministerial review, may appeal such decision by filing an appeal with the City Clerk within 15 calendar days of the date of the written notice of the decision. The appeal shall be made on the forms provided by the Community Development Department and shall be accompanied by the applicable filing fee as set forth by resolution. Upon receipt of a completed appeal form, the City Clerk shall set the matter of the appeal for hearing before the Planning Commission not less than fifteen (15) nor more than sixty (60) days thereafter and shall give written notice of the hearing to the applicant, appellant, and the Community Development Director. The Planning Commission shall hear the appeal *de novo*. The Planning Commission shall render its decision within thirty (30) days following the close of the appeal hearing.

(b) On February 27, 2025, Wakeland submitted a timely appeal of the Community Development Director's denial of the Project.

Section 3. Procedural Findings. The Planning Commission of the City of Jurupa Valley does hereby find, determine and declare that:

(a) The application for the Project was processed including, but not limited to a public notice, in the time and manner prescribed by State law and Jurupa Valley Ordinances.

(b) On April 28, 2025, the Planning Commission of the City of Jurupa Valley held a public hearing on the appeal of the Project at which time all persons interested in the Project had the opportunity and did address the Planning Commission on these matters. Following the receipt of public testimony, the Planning Commission closed the public hearing.

(c) All legal preconditions to the adoption of this Resolution have occurred.

Section 4. California Environmental Quality Act Findings. The Planning Commission, based on its own independent judgment, does hereby find, determine and declare that the Project is exempt from the requirements of the California Environmental Quality Act ("CEQA") (Cal. Pub. Res. Code, § 21000 et seq.) and the State Guidelines (the "CEQA Guidelines") (14 Cal. Code Regs. § 15000 et seq.) pursuant to Section 15270(a) of the CEQA Guidelines because CEQA does not apply to projects which a public agency rejects or disapproves.

Section 5. Findings for Denial of Supportive Housing Project. The Planning Commission of the City of Jurupa Valley does hereby deny the supportive housing project pursuant to Government Code Section 65650 *et seq.* based on the following grounds:

(a) Government Code Section 65651(a) provides that supportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, if the proposed housing development satisfies all of the following requirements:

(1) Units within the development are subject to a recorded affordability restriction for 55 years.

(2) One hundred percent of the units, excluding managers' units, within the development are restricted to lower income households and are or will be receiving public funding to ensure affordability of the housing to lower income Californians. For purposes of this paragraph, "lower income households" has the same meaning as defined in Section 50079.5 of the Health and Safety Code. The rents in the development shall be set at an amount consistent with the rent limits stipulated by the public program providing financing for the development.

(3) At least 25 percent of the units in the development or 12 units, whichever is greater, are restricted to residents in supportive housing who meet criteria of the target population. If the development consists of fewer than 12 units, then 100 percent of the units, excluding managers' units, in the development shall be restricted to residents in supportive housing.

(4) The developer provides the planning agency with the information

required by Section 65652.

(5) Nonresidential floor area shall be used for onsite supportive services and administrative office space in the following amounts:

(A) For a development with 20 or fewer total units, at least 90 square feet shall be provided for onsite supportive services.

(B) For a development with more than 20 units, at least 3 percent of the total floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.

(C) The total floor area dedicated to administrative office space shall not exceed 25 percent of the total floor area.

(6) The developer replaces any dwelling units on the site of the supportive housing development in the manner provided in paragraph (3) of subdivision (c) of Section 65915.

(7) Units within the development, excluding managers' units, include at least one bathroom and a kitchen or other cooking facilities, including, at minimum, a stovetop, a sink, and a refrigerator.

(b) The Project does not meet the requirements set forth in Government Code section 65651 for the by right approval of a supportive housing project. Specifically, Government Code section 65651(a)(5) provides that for a development with more than 20 units, at least 3 percent of the total floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens. The Project does not provide any onsite supportive services. Instead, the Project is bisected by Canyon Terrace Drive, dividing it into two separate sites: the 5.88-acre southern portion, which includes six multi-story multifamily buildings with 28 supportive housing units, 51 affordable units, and one manager's unit, and the 9.65-acre northern portion, which contains a 2,560-square-foot community building with supportive services, laundry facilities, and outdoor spaces, along with a 6,463-square-foot child daycare center. As the supportive services are provided on a separate site and not on the same site as the supportive housing, the Project does not meet the requirement of providing onsite supportive services.

Section 6. Findings Under the Housing Accountability Act.

(a) Government Code Section 65589.5(d) provides that for a housing development project for very low, low-, or moderate-income households, a local agency shall not disapprove the housing development project, or condition approval in a manner that renders the housing development project infeasible, including through the use of design review standards, unless it makes one of the following written findings, based upon a preponderance of the evidence in the record:

(1) The housing development project as proposed 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 without rendering the development unaffordable to low- and moderate-income households (Gov. Code Section 65589.5(d)(2)).

The Project would have a specific, adverse impact upon the public health and safety as Wakeland has not proposed to construct any sidewalk improvements as required by the objective standards set forth in the Mobility Element of the General Plan. Specifically, Mobility Element Policy ME 2.11 states that the City “[r]equire[s] street improvements as a condition of new developments, including undergrounding of utility lines, installation of fiber optic cable and other utilities, sidewalk, curb, gutter and street pave-out, bicycle and equestrian facilities, street lighting (where appropriate), street trees and landscaping.” ME 3.21 states that the City “[r]equire[s] safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.” ME 8.10 states that “Developers shall be responsible for right-of-way dedication and improvements that provide access to and enhance new developments. Improvements include street construction or widening, new paving, frontage improvements like curb, gutter, sidewalks, street trees, trails and parkways, installation of traffic signals, pavement markings and annunciators, and other facilities needed for the safe and efficient movement of pedestrians, bicyclists, equestrians, and motor vehicles.” These standards are intended to protect the public health and safety.

The Project is located adjacent to Camino Real, a four lane road (two lanes in each direction), with a speed limit of 40 miles per hour. Wakeland is seeking a concession under State Density Bonus Law to avoid constructing any sidewalk improvements. This creates a dangerous situation for residents, including children, of the Project who will need to travel along Camino Real where the speed limit is 40 miles per hour in order to get to and from the Project site and the bus stops located on the corners of Limonite Avenue and Camino Real. The situation is made even more dangerous by the fact that the Project is intended to provide housing and services for homeless veterans, some of whom may need to use mobility devices, and will need to travel with their mobility devices on the same road where cars are traveling at a high rate of speed. The only way to mitigate this danger is for Wakeland to construct ADA-compliant sidewalk improvements that would allow pedestrians and persons using mobility devices to travel from the bus stops to the Project site (and from the Project site to the bus stops), without needing to travel in the roadway on Camino Real.

(2) The denial of the housing development project or imposition of conditions is required in order to comply with specific state or federal law, and there is no feasible method to comply without rendering the development unaffordable to low- and moderate-income households (Gov. Code Section 65589.5(d)(3)).

The City is required to deny the Project as Wakeland is refusing to comply with requirements imposed by the Americans with Disabilities Act and the California Building Code. As discussed above, Wakeland is required to construct sidewalks pursuant to the policies set forth in the Mobility Element of the General Plan. Where sidewalks are required, the Americans with Disabilities Act (“ADA”) mandates that the sidewalks be accessible, including providing connectivity to the nearest transit stops.

The ADA mandates that public facilities, including sidewalks, must be accessible to individuals with disabilities. The Project does not comply with a number of ADA regulations and standards. According to ADA Standards for Accessible Design Standards, Section 206.2.1, at least one accessible route must be provided within the site to accessible facility entrances from these site arrival points, where provided: (1) accessible parking and accessible passenger loading zones, (2) public streets and sidewalks, and (3) each public transportation stop. Wakeland is seeking a concession to not construct any sidewalks adjacent to the Project site. This results in there being no accessible unobstructed route to the Project site and therefore, none of the buildings are accessible from a public street, a public sidewalk, or a public transportation stop. The only way to get to the site is by driving, which prevents an individual who uses a mobility device from having an accessible route between the public streets and sidewalks in nearby neighborhoods or from the public bus stops.

*The Project also does not comply with the requirements set forth in California Building Code, Title 24 of the California Code of Regulations Section 1114B.1.2, which states that “when a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7, and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances, and between the building and the public way. . . **At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones, and public streets or sidewalks,** to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility. An accessible route shall connect at least one accessible entrance of each accessible dwelling unit with those exterior and interior spaces and facilities that serve the accessible dwelling unit. Where more than one route of travel is provided, all routes shall be accessible.”*

Moreover, California Building Code, Title 24 of the California Code of Regulations Section 11B-206.2.1 provides that at least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger drop-off and loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. The Project is not providing an accessible route from a public transportation stop or from any public street or sidewalk to any of the buildings on the Project site.

Compliance with these requirements are essential to ensuring safe and accessible pathways for individuals who need to access the various buildings on site including the housing on the south site, the supportive housing services, child care, and laundry facilities on the north site, as well as transit services along Limonite Avenue. As no sidewalks are proposed, the Project fails to meet the ADA and California Building Code requirements set forth above.

(3) On the date an application for the housing development project was deemed complete, the jurisdiction had adopted a revised housing element that was in substantial compliance with this article, and the housing development project was inconsistent with both the

jurisdiction's zoning ordinance and general plan land use designation as specified in any element of the general plan (Gov. Code Section 65589.5(d)(5)).

The City has a certified Housing Element that is in compliance with State law. The Project site is identified in the 6th Cycle Housing Element. APN 185-470-001 is identified as being available to provide 15 above moderate housing units. APN 185-470-002 is identified as being available to provide 17 above moderate housing units. As these units are identified as being available for above moderate units, the City can make the findings set forth in Government Code Section 65589.5(d)(5) because the site inventory does not identify the Project site as suitable or available for very low, low-, or moderate-income households in the City's Housing Element.

On the date that the Project was deemed complete, the Project was inconsistent with the City's zoning ordinance and General Plan. The Project includes a childcare center. Jurupa Valley Municipal Code Section 9.80.0202(A)(25) provides that a childcare center is allowed in the R-3 zone with a site development permit. Wakeland has not submitted an application for a site development permit for the child care center and, therefore, the Project does not comply with the City's zoning ordinance.

In addition, Jurupa Valley Municipal Code Section 9.240.120(6)(c)(ii) provides that "accessible parking spaces shall be located so as to provide for safety and optimum proximity to curb ramps or other pedestrian ways thereby, providing the most direct access to the primary entrance of the building served by the parking lot." The accessible parking spaces do not provide direct access to the primary entrance of three multi-family buildings and the community building as required by this code section.

The Project is also inconsistent with the Land Use Element of the General Plan. Page 2-20 of the Land Use Element explains that "The General Plan Land Use Map establishes the pattern and arrangement of land uses in Jurupa Valley. It shows the locations and boundaries of the various land use designations and overlays. The land use designations encompass one or more "zones," as described in the City's Zoning Ordinance and Zoning Map. Zoning implements the General Plan by setting specific use requirements and development standards for each zone. Within each land use designations, one or more zones may be associated with that designation, depending upon the specific types of land uses to be allowed/encouraged. Table 2.5 shows the relationship of General Plan Land Use Designations and Zones. For more information on Zones and development regulations, refer to the City's Zoning Ordinance and Official Zoning Map." The General Plan identifies that the City's zoning ordinance establishes the specific use requirements and development standards. As noted above, the Project is inconsistent with the City's zoning ordinance as the Project did not apply for a site development permit for the childcare center.

(b) Government Code Section 65589.5(j) provides that when a proposed housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete, but the local agency proposes to disapprove the project or to impose a condition that the project be developed at a lower density, the local agency shall base its decision regarding the proposed housing development project upon written findings supported by

a preponderance of the evidence on the record that both of the following conditions exist: (1) the housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density; and (2) there is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.

The Project does not comply with the objective General Plan and zoning standards. The Project includes a childcare center. Jurupa Valley Municipal Code Section 9.80.0202(A)(25) provides that a childcare center is allowed in the R3 zone with a site development permit. Wakeland has not submitted an application for a site development permit for the child care center and, therefore, the Project does not comply with the City's zoning ordinance.

In addition, Jurupa Valley Municipal Code Section 9.240.120(6)(c)(ii) provides that "accessible parking spaces shall be located so as to provide for safety and optimum proximity to curb ramps or other pedestrian ways thereby, providing the most direct access to the primary entrance of the building served by the parking lot." The accessible parking spaces do not provide direct access to the primary entrance of three multi-family buildings and the community building as required by this code section.

Moreover, as noted above, the Project does not comply with objective standards set forth in the Mobility Element of the General Plan. Specifically, Mobility Element Policy ME 2.11 states that the City "[r]equire[s] street improvements as a condition of new developments, including undergrounding of utility lines, installation of fiber optic cable and other utilities, sidewalk, curb, gutter and street pave-out, bicycle and equestrian facilities, street lighting (where appropriate), street trees and landscaping." ME 3.21 states that the City "[r]equire[s] safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments." ME 8.10 states that "Developers shall be responsible for right-of-way dedication and improvements that provide access to and enhance new developments. Improvements include street construction or widening, new paving, frontage improvements like curb, gutter, sidewalks, street trees, trails and parkways, installation of traffic signals, pavement markings and annunciators, and other facilities needed for the safe and efficient movement of pedestrians, bicyclists, equestrians, and motor vehicles." The Project does not propose to construct any sidewalks in contravention of the above referenced General Plan policies.

As the Project does not meet the above referenced objective General Plan and zoning standards, the Project can be denied. Moreover, as discussed in subsection (a)(1) above, the Project would have a specific, adverse impact upon the public health and safety as Wakeland has not proposed to construct any sidewalk improvements as required by the Mobility Element, and there is no way to mitigate the adverse impact without constructing the necessary sidewalk improvements.

Section 7. Denial of Density Bonus Application. The density bonus application is denied because the Project is being denied.

Section 8. Denial of Master Application No. 24164. Based on the foregoing, Reso. No. PC-2025-06

the Planning Commission of the City of Jurupa Valley hereby denies Master Application No. 24164 comprised of Site Development Permit (SDP24074) to construct an 80-unit affordable housing project consisting of 28 supportive housing units and 51 affordable housing units, a 2,560 square foot community building, and 6,463 square foot child daycare center at the northeast corners of Camino Real and Limonite Avenue, and Camino Real and Canyon Terrace Drive, identified as Assessor's Parcel Numbers 185-460-001, 185-470-001, 185-470-002.

Section 9. **Certification.** The Community Development Director shall certify to the adoption of this Resolution.

PASSED, APPROVED AND ADOPTED by the Planning Commission of the City of Jurupa Valley on this 28th day of April, 2025.



Arleen Pruitt

Chair of Jurupa Valley Planning Commission

ATTEST:



Joe Perez

Assistant City Manager/Community Development Director/Secretary to the Planning Commission

STATE OF CALIFORNIA)

COUNTY OF RIVERSIDE) ss.

CITY OF JURUPA VALLEY)

I, Joe Perez, Community Development Director of the City of Jurupa Valley, do hereby certify that the foregoing Resolution No. 2025-06 was duly adopted and passed at a meeting of the Planning Commission of the City of Jurupa Valley on the 28th day of April, 2025, by the following vote, to wit:

AYES: COMMISSION MEMBERS: **Chair Pruitt, Chair Pro Tem Shultz, Commissioners De La Torre, and Newman**

NOES: COMMISSION MEMBERS:

ABSENT: COMMISSION MEMBERS: **Commissioner Rosales**

ABSTAIN: COMMISSION MEMBERS:



JOE PEREZ
COMMUNITY DEVELOPMENT DIRECTOR

ATTACHMENT NO. 2

MA24164 (Original) Project Plan Set
(Architectural, Civil, and Landscape Plans)



CAMINO TERRACE APARTMENTS

JURUPA VALLEY - CALIFORNIA

SCHEMATIC DESIGN 2ND SUBMITTAL PLANS W.I.P. - AUGUST 7, 2024

SCHEMATIC DESIGN 1ST SUBMITTAL PLANS - JUNE 21, 2024

RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC.
 2845 TWIN TRAILS DRIVE, PO BOX 22290, SAN DIEGO, CA 92107 TEL: (619) 544-8521

PROJECT DIRECTORY

OWNER: HOUSING AUTHORITY OF THE COUNTY OF RIVERSIDE
 5555 ARLINGTON AVENUE RIVERSIDE, CALIFORNIA 92504

ARCHITECT: RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC.
 2845 TWIN TRAILS DRIVE, P.O. BOX 22290 SAN DIEGO, CALIFORNIA 92107 (619) 544-8521

APPLICANT: WAKELAND HOUSING AND DEVELOPMENT CORP.
 1230 COLUMBIA ST., SUITE 850 SAN DIEGO, CALIFORNIA 92101 (619) 238-2256 (619) 235-5338 FAX

CIVIL ENGINEER: SISSELO INC. CIVIL ENGINEERING
 3900 RUFFIN ROAD, SUITE 120 SAN DIEGO, CALIFORNIA 92123 (619) 560-1141

ALL ELECTRIC RESIDENTIAL PROJECT

THIS SCHEMATIC PROJECT SHALL BE POWERED BY EXISTING THROUGH ELECTRICITY WITH NO CONNECTIONS TO GAS INFRASTRUCTURE. ALL RESIDENTIAL PROJECTS SHALL COMPLY WITH ALL LOCAL, STATE AND FEDERAL REGULATIONS. ALL ELECTRICAL WORK SHALL BE PERFORMED IN ACCORDANCE WITH THE NATIONAL ELECTRICAL CODE (NEC) AND ALL APPLICABLE LOCAL, STATE AND FEDERAL REGULATIONS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL UTILITIES & CONNECTIONS TO THE JOB. THIS OFFICE SHALL BE NOTIFIED OF ALL WORKS THAT THE CONTRACTOR IS CONSIDERING BEING BY THE CONTRACTOR.

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AD250	UNIT IP1 FLOOR PLANS		
AD251	UNIT IQ1 FLOOR PLANS		
AD252	UNIT IR1 FLOOR PLANS		
AD253	UNIT IS1 FLOOR PLANS		
AD254	UNIT IT1 FLOOR PLANS		
AD255	UNIT IU1 FLOOR PLANS		
AD256	UNIT IV1 FLOOR PLANS		
AD257	UNIT IU1 FLOOR PLANS		
AD258	UNIT IV1 FLOOR PLANS		
AD259	UNIT IU1 FLOOR PLANS		
AD260	UNIT IV1 FLOOR PLANS		
AD261	UNIT IU1 FLOOR PLANS		
AD262	UNIT IV1 FLOOR PLANS		
AD263	UNIT IU1 FLOOR PLANS		
AD264	UNIT IV1 FLOOR PLANS		
AD265	UNIT IU1 FLOOR PLANS		
AD266	UNIT IV1 FLOOR PLANS		
AD267	UNIT IU1 FLOOR PLANS		
AD268	UNIT IV1 FLOOR PLANS		
AD269	UNIT IU1 FLOOR PLANS		
AD270	UNIT IV1 FLOOR PLANS		
AD271	UNIT IU1 FLOOR PLANS		
AD272	UNIT IV1 FLOOR PLANS		
AD273	UNIT IU1 FLOOR PLANS		
AD274	UNIT IV1 FLOOR PLANS		
AD275	UNIT IU1 FLOOR		



BUILDING TYPE I
FRONT EXTERIOR ELEVATION - APARTMENTS



BUILDING TYPE II
FRONT EXTERIOR ELEVATION - APARTMENTS



BUILDING TYPE III
FRONT EXTERIOR ELEVATION - APARTMENTS

TYPICAL EXTERIOR FINISHES

- CONC. FLAT TILE AT SLOPED ROOFS
ROOF PITCH SHALL BE: 4:12
- EXTERIOR STUCCO WALL FINISH
- EXT. CEMENTITIOUS SIDING WALL FINISH
- EXPOSED WOOD CORBELS
- WOOD WINDOW CANopies
- EXPOSED WOOD/METAL TRUSS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD FRENCH DOORS
- VINYL FRAMED WINDOWS
- WOOD WINDOW/DOOR/WALL TRIMS
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCCO/SIDING COLOR RANGE:
SUCH AS:
- WARM GRAY
- WARM SIENNA COLOR
- BURNT OCHRE EARTH TONE
- WARM / OFF-WHITES
- EARTH GREEN / OLIVE
- WARM GUARDICOL
- METAL RAILINGS ACCENT COLOR RANGE:
SUCH AS:
- SLATE ORANGE / VERMILION
- SLATE GREEN / SAGE
- CLEAR ALUMINUM
- WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A "CHAFTSMAN COLLECTIC" DESIGN CONSISTING OF NEUTRAL BROWN, TAN BLUE AND RED COLORS. THE PROJECT INCLUDES ONE, TWO, THREE-STORY APARTMENT & COMMON BUILDINGS WITH VARIED HEIGHTS OF APPROXIMATELY 10' TO 37'.

THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:

1. DIFFERENTIATED COLOR MATERIALS AND TRIM TO DISTINGUISH THE BUILDING'S VERTICAL AND HORIZONTAL BODY MASSING.
2. TREE AND SHRUB LANDSCAPING AROUND THE BUILDING TO PROVIDE PEDESTRIAN SCALE, ENHANCED WALKWAYS, SCREENING AND PRIVACY TO THE DWELLING UNITS.
3. MASS BREAKS AND USE OF VARIED SIDING EXPRESSES THE INDIVIDUAL CHARACTER OF DWELLING UNITS. SIDING ELEMENTS REINFORCE THE CHAFTSMAN ELECTRIC STYLE AND SUPPORTED WITH AMERICAN FARMHOUSE DESIGN ACCENTS.
4. ARTICULATION ENTRANCES, WOOD CANES CORBELS, WINDOW MULLIONS, WALL TRIM, MULTIPLE COLORS, VARIED ROOF LINES AND BALCONIES PATIOS ADD VISUAL INTEREST AND CHARACTER.

CAMINO TERRACE APARTMENTS
JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1330 COLUMBIA ST, SUITE 100
SAN DIEGO, CALIF. 92101 619 225-0297 FAX 619 225-0298

CHARACTER SKETCHES

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
▲			▲		
▲			▲		

DATE: JUNE 21, 2024

JOB NO.:

DRAWN:

CHECKED:

CS.1

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EXTERIOR ELEVATION 1

BUILDING TYPE IV

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 1

COMMUNITY BUILDING

SCALE: 3/16" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 3338 COLUMBIA ST., SUITE 100
 SAN DIEGO, CALIF. 92108
 (619) 235-2296 FAX (619) 235-0206 FAX

COLORED BUILDING ELEVATIONS

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
A	1	UPDATED PLAN			

DATE	JUNE 21, 2024
JOB NO.	
DRAWN	
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SITE PERIMETER VIEW - EAST STREET VIEW ALONG CAMINO REAL
 DAYCARE & COMMUNITY BUILDING VIEW OF NORTH PARCEL

SCALE 1" = 20'-0"



SITE PERIMETER VIEW - EAST STREET VIEW ALONG CAMINO REAL
 RESIDENTIAL BUILDING VIEW OF SOUTH PARCEL

SCALE 1" = 20'-0"

ELEVATION SHEET KEYNOTES	
1	TILE ROOF BY EAGLE ROOF PRODUCTS, MODEL GOLDEN EAGLE PROFILE, COLOR 1957 BROWN GRAY RANGE.
2	HARDIE PANEL LAP SIDING, COLOR EVENING BLUE BY JAMES HARDIE BUILDING PRODUCTS, INC.
3	HARDIE PANEL LAP SIDING, COLOR COBBLE STONE BY JAMES HARDIE BUILDING PRODUCTS, INC.
4	HARDIE PANEL LAP SIDING, COLOR COUNTRYLANE RED BY JAMES HARDIE BUILDING PRODUCTS, INC.
5	HARDIE PANEL VERTICAL SIDING, COLOR COBBLE STONE BY JAMES HARDIE BUILDING PRODUCTS, INC.
6	HARDIE PANEL VERTICAL SIDING, COLOR COUNTRYLANE RED BY JAMES HARDIE BUILDING PRODUCTS, INC.
7	STUCCO COLOR SW7009 PEARLY WHITE BY SHERWIN WILLIAMS.
8	DOOR ACCENT COLOR SW2847 ROYALFORT BOTTLE GREEN BY SHERWIN WILLIAMS.
9	DOOR ACCENT COLOR SW3633 GINGERLY BY SHERWIN WILLIAMS.
10	EXPOSED WOOD COLOR SW7740 MESSENGER BAG BY SHERWIN WILLIAMS.



SITE PERIMETER VIEW - SOUTH STREET VIEW ALONG CANYON TERRACE DR.
 RESIDENTIAL BUILDING VIEW OF SOUTH PARCEL

SCALE 1" = 20'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 1200 COLUMBIA ST, SUITE 100
 SAN DIEGO, CALIF. 92101
 (619) 235-2706 FAX: (619) 235-5366 FAX

SITE ELEVATIONS							
REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE
▲				▲			
▲				▲			
▲				▲			
			DATE: JUNE 21, 2024				
			JOB NO.:				
			ISSUED:				
			CHECKED:				
							CLR.2



SITE PERIMETER VIEW - NORTH STREET VIEW ALONG CANYON TERRACE DR.
 DAYCARE & COMMUNITY BUILDING VIEW OF NORTH PARCEL

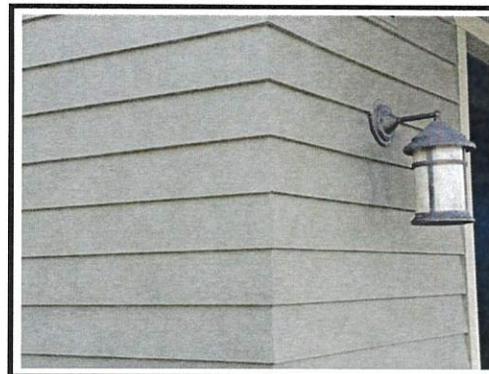
SCALE 1" = 20'-0"

COLOR & MATERIAL BOARD

AUGUST 21, 2024



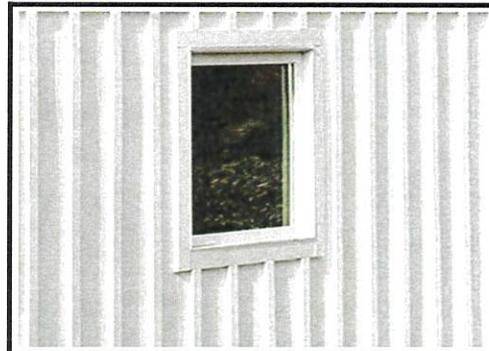
GOLDEN EAGLE 1687 - EAGLE ROOF TILE (1)



HARDIE PANEL LAP SIDING (2)(3)(4)

	
COUNTRYLANE RED (4) BY JAMES HARDIE	SW6363 GINGERY (9) BY SHERWIN WILLIAMS
	
EVENING BLUE (2) BY JAMES HARDIE	SW7740 MESSENGER BAG (7) BY SHERWIN WILLIAMS
	
COBBLE STONE (3)(5) BY JAMES HARDIE	SW7009 PEARLY WHITE (7) BY SHERWIN WILLIAMS
	
SW2847 ROYCROFT BOTTLE GREEN (8) BY SHERWIN WILLIAMS	

WALL & ACCENT COLORS



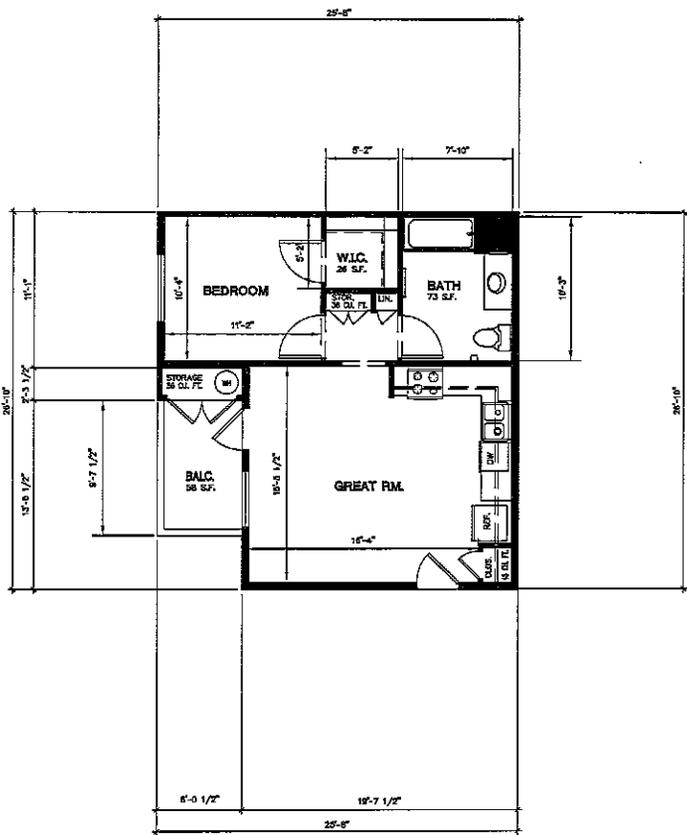
HARDIE PANEL VERTICAL SIDING (5)(6)



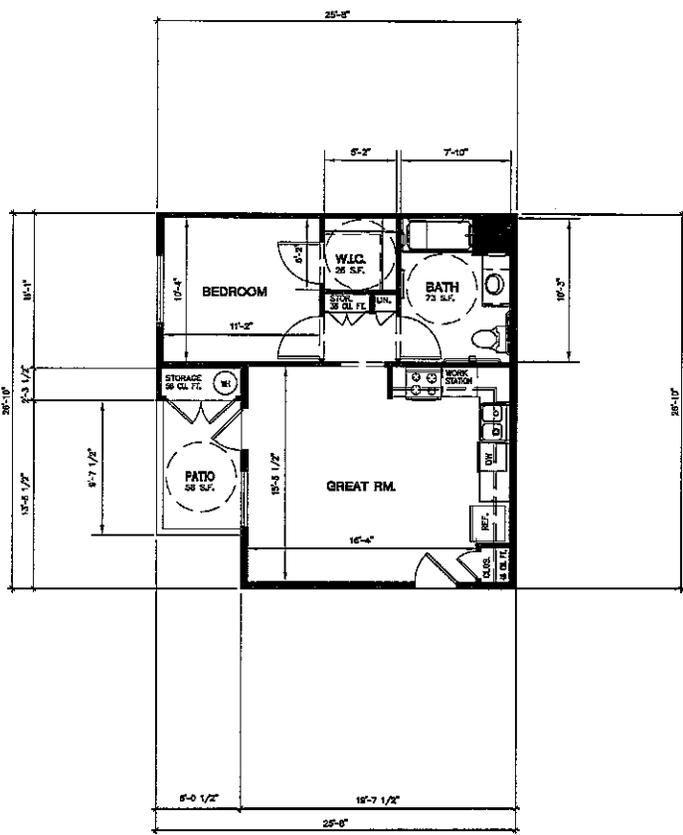
STUCCO TEXTURE - MEDIUM SAND FINISH (7)

NOTE: COLORS PRESENTED INDICATE A PROPOSED COLOR RANGE THAT SHALL BE FIELD TESTED & FINALIZED DURING CONST.

CAMINO TERRACE APARTMENTS



UNIT A12 **593 SQ. FT** **UPPER LEVEL UNIT**
 1 BEDROOM - 1 BATH SCALE: 1/4" = 1'-0"



UNIT A11 **593 SQ. FT** **GROUND LEVEL UNIT**
 1 BEDROOM - 1 BATH SCALE: 1/4" = 1'-0"
 [A] ADAPTABLE & [B] ACCESSIBLE UNIT

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 120 COLLEMAN CT. SUITE 100
 SAN DIEGO, CALIF. 92101 608 235 2290 FAX 608 235 0366

UNIT A1 FLOOR PLANS

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE
A	1	UPDATED PLAN	05/07/24	A			

DATE: JUNE 21, 2024

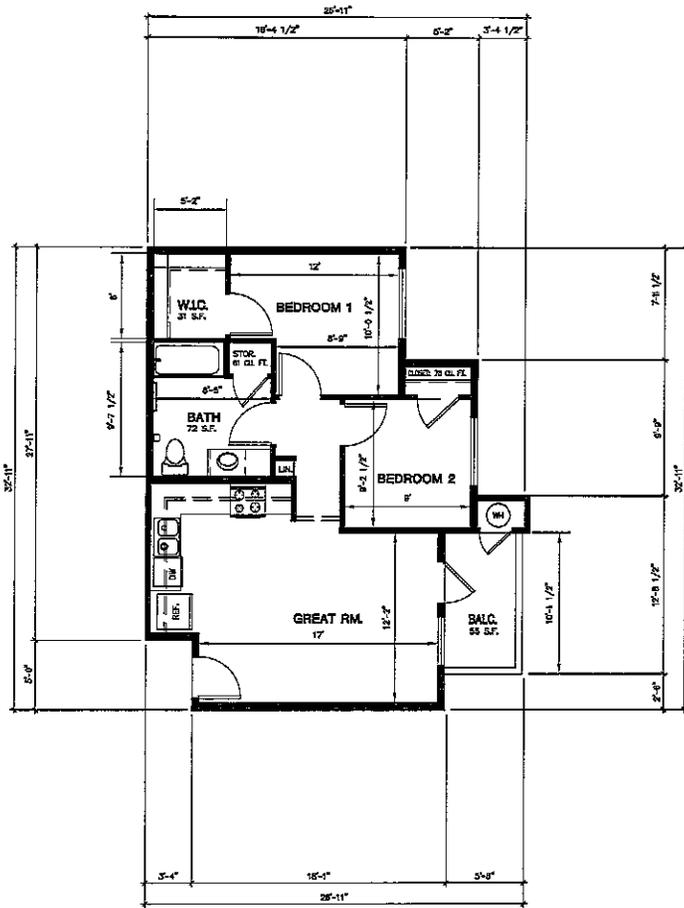
JOB NO.: _____

DESIGN: _____

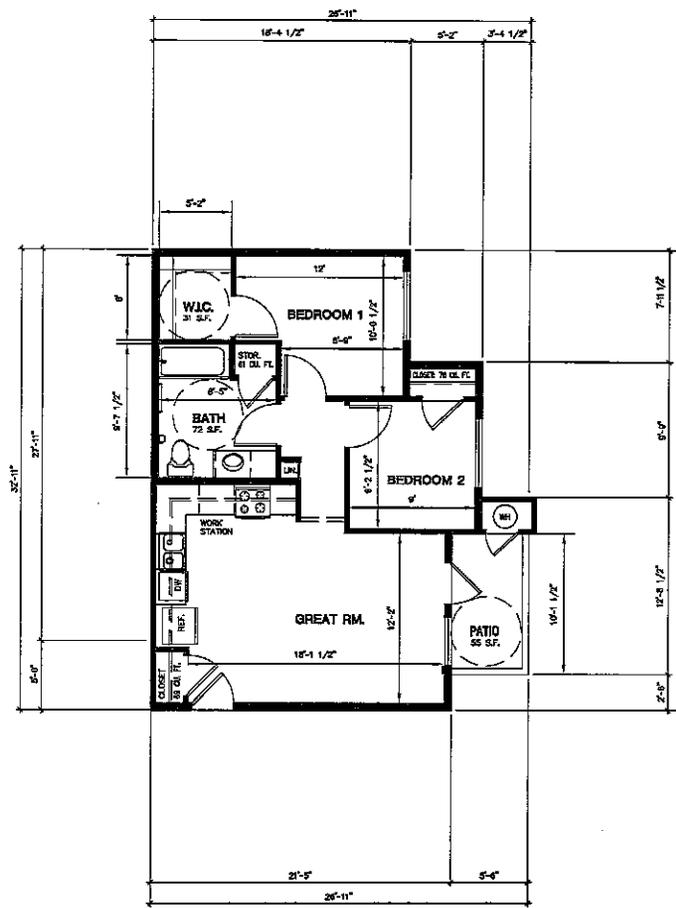
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UNIT B12 690 SQ. FT. UPPER LEVEL UNIT
 2 BEDROOM - 1 BATH SCALE: 1/4" = 1'-0"



UNIT B11 707 SQ. FT. GROUND LEVEL UNIT
 2 BEDROOM - 1 BATH SCALE: 1/4" = 1'-0"
 ADAPTABLE & ACCESSIBLE UNIT

UNIT B1 FLOOR PLANS

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
1	UPGRADE PLAN	06/27/24			

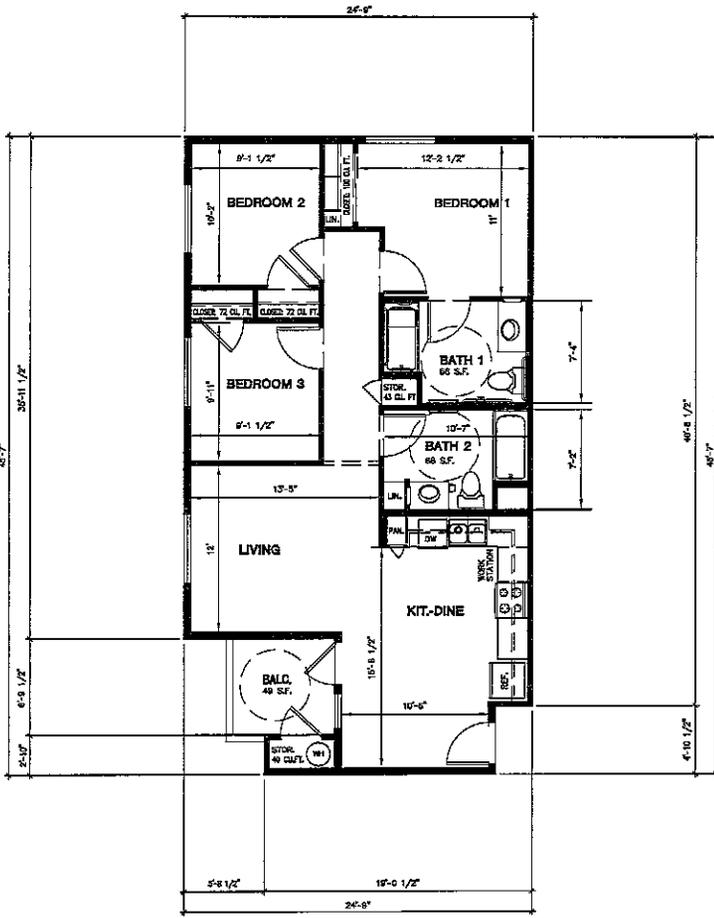
DATE: JUNE 21, 2024

JOB NO. _____

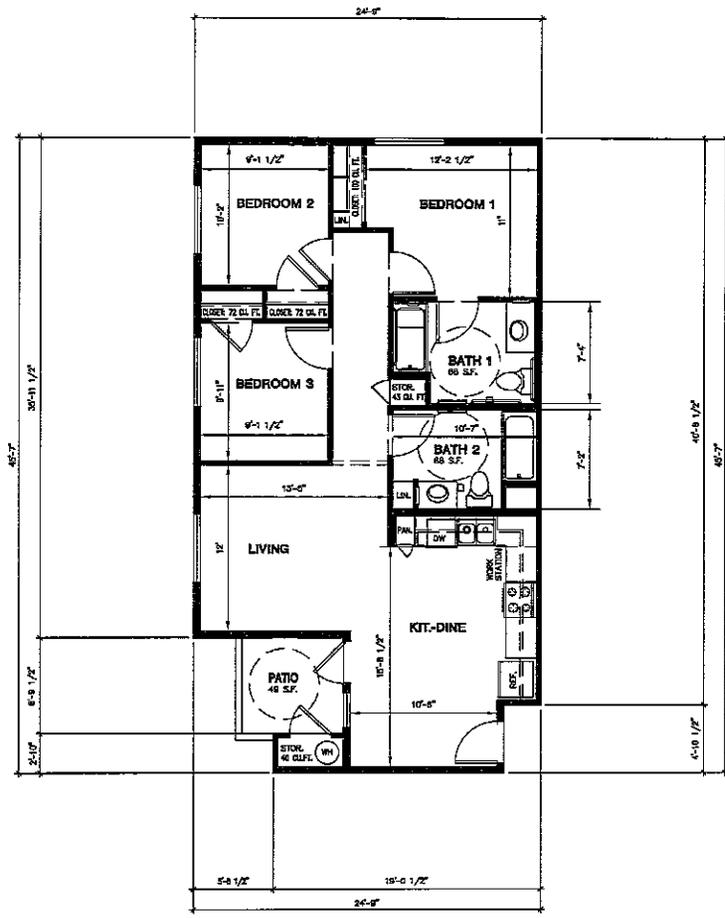
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A0.2



UNIT C1.2 **1,012 SQ. FT** **UPPER LEVEL UNIT**
 3 BEDROOM - 2 BATH SCALE: 1/4" = 1'-0"



UNIT C1.1 **1,012 SQ. FT** **GROUND LEVEL UNIT**
 3 BEDROOM - 2 BATH SCALE: 1/4" = 1'-0"

ADAPTABLE & ACCESSIBLE UNIT

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 5200 COLLEEMAUN DRIVE, 5TH FLOOR
 SAN DIEGO, CALIF. 92121 (619) 225-2286 FAX (619) 225-2286

UNIT C1 FLOOR PLANS

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE
▲	1	UPDATED PLAN	06/20/24	▲			

DATE: JUNE 21, 2024

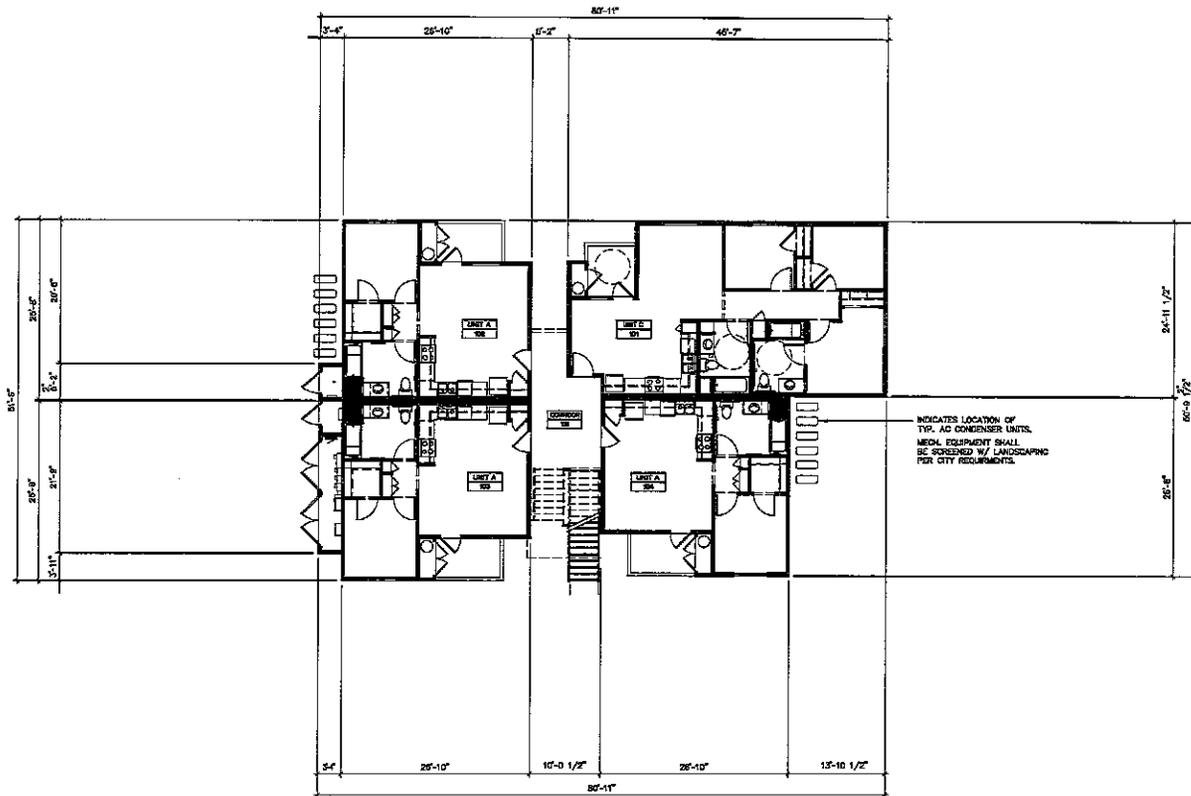
JOB NO. _____

DRAWN _____

CHECKED _____

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INDICATES LOCATION OF
 TYP. AC CONDENSER UNITS.
 MEDICAL EQUIPMENT SHALL
 BE SCREENED W/ LANDSCAPING
 FOR CITY REQUIREMENTS.

ALL FIRST FLOOR UNITS ARE HANDICAP ADAPTABLE AND ACCESSIBLE UNITS

BLDG. I - FIRST FLOOR PLAN

10,086 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 220 COLUMBIA BL, SUITE 900
 SAN DIEGO, CALIF. 92101 619 252-2811 FAX: 619 252-2816

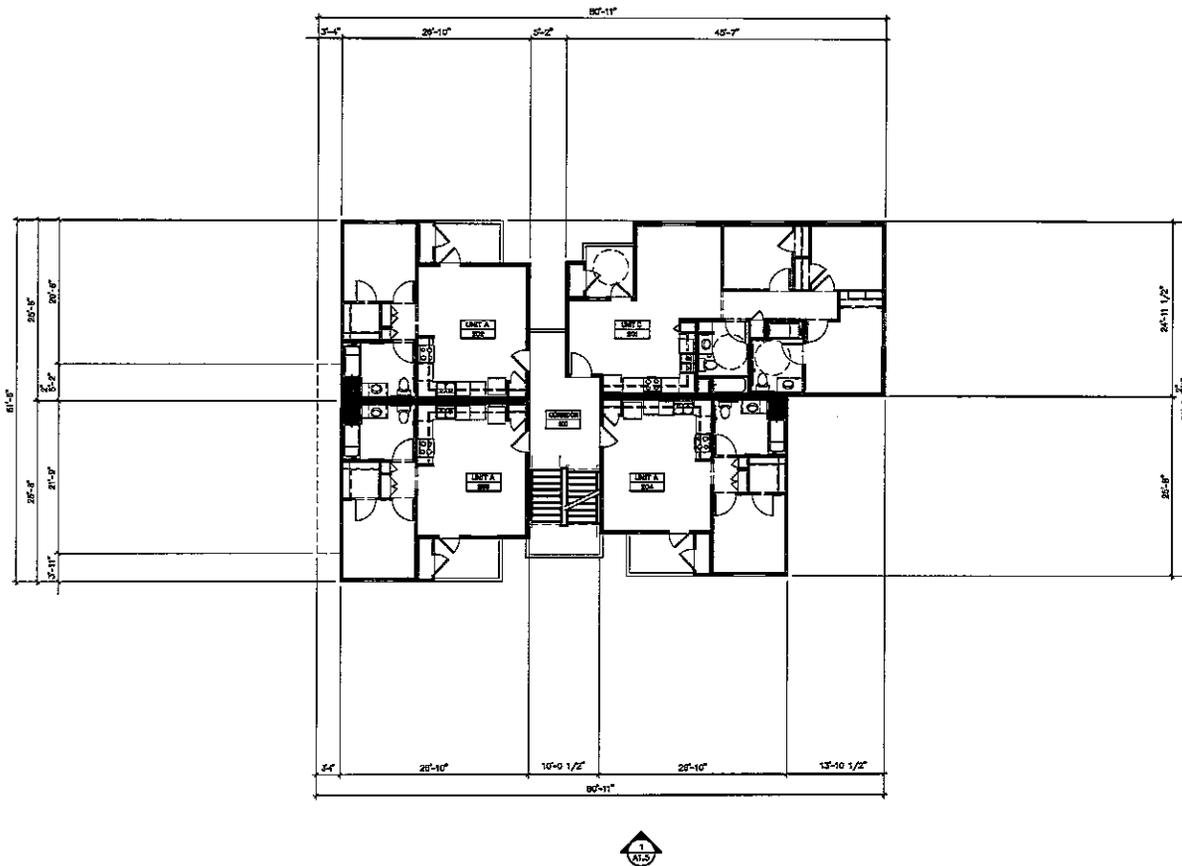
BLDG. I - 1ST FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
A	1	UPDATED PLAN	A		06/27/24
A			A		
A			A		

DATE	JUNE 21, 2024
JOB NO.	
DESIGN	
CHECKED	

A1.1

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BLDG. I - SECOND FLOOR PLAN

10,066 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 220 COLUMBIA ST. SUITE 200
 SAN DIEGO, CALIF. 92101
 619 255-2766 FAX 619 255-2866

BLDG. I - 2ND FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
1			1		
2			2		
3			3		

DATE: JUNE 21, 2024

JOB NO. _____

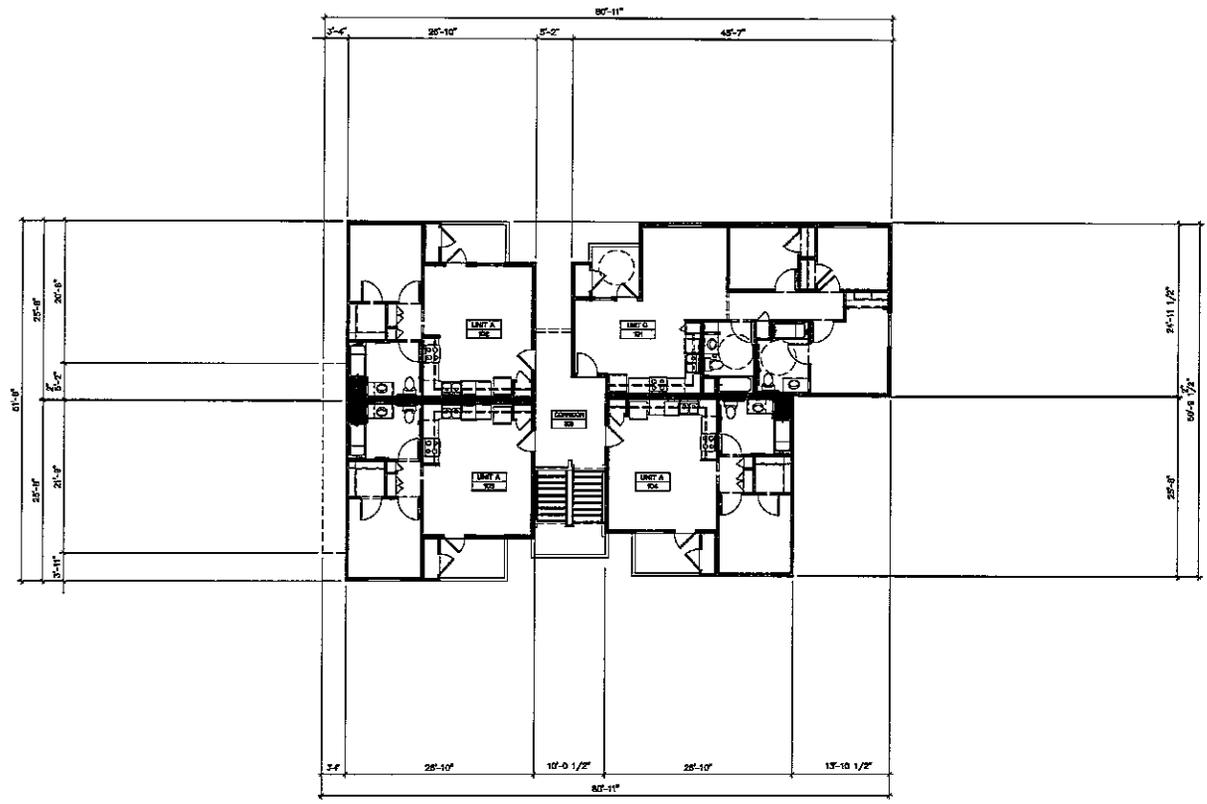
DESIGN _____

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DATE _____

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BLDG. I - THIRD FLOOR PLAN

10,066 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 228 COLUMBIA ST., SUITE 200
 SAN DIEGO, CALIF. 92101
 (619) 233-2941 FAX: (619) 233-2946

BLDG. I - 3RD FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE

DATE: JUNE 21, 2024
 JOB NO.:
 DRAWN:
 CHECKED:

A1.3

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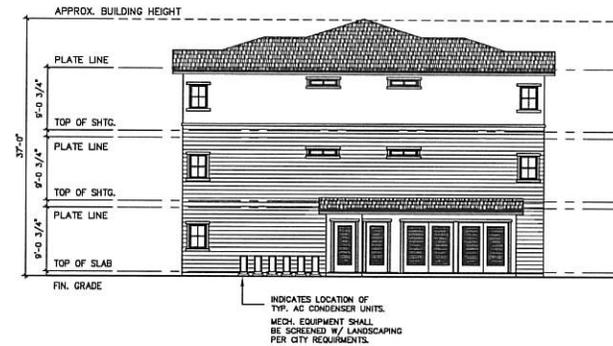
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EXTERIOR ELEVATION 1

BUILDING TYPE I - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 2

BUILDING TYPE I - 1-HR FIRE RATED

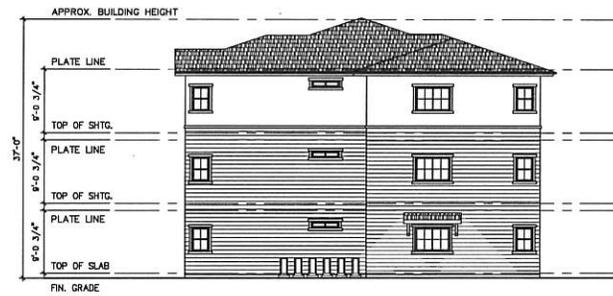
SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 3

BUILDING TYPE I - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 4

BUILDING TYPE I - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"

TYPICAL EXTERIOR FINISHES

- CONIC FLAT TILE AT SLOPED ROOFS ROOF PITCH SHALL BE 4:12
- EXTERIOR STUCCO WALL FINISH
- EXT. CEMENTITIOUS SIDING WALL FINISH
- EXPOSED WOOD CORBELS
- WOOD WINDOW CANopies
- EXPOSED WOOD/METAL TRELLIS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD FRENCH DOORS
- VINYL FRAMED WINDOWS
- WOOD WINDOW/WOOD/WALL TRIMS
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCCO/SIDING CO. OR RANGE
- SUCH AS:
 - WARM GRAY
 - WARM SIENNA COLOR
 - BURNT COBBLE EARTH TONE
 - WARM / OFF-WHITES
 - EARTH GREEN / OLIVE
 - WARM CHARCOAL
- METAL RAILINGS ACCENT COLOR RANGE
- SUCH AS:
 - SLATE ORANGE / VERMILION
 - SLATE GREEN / SAGE
 - CLEAR ALUMINUM
 - WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A "CHAFTSMAN ECLECTIC" DESIGN CONSISTING OF NEUTRAL BROWN, TAN, BLUE AND RED COLORS. THE PROJECT INCLUDES ONE, TWO, THREE-STORY APARTMENTS & A COMMON BUILDING WITH VARIOUS HEIGHTS OF APPROXIMATELY 26 TO 37'.

THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:

1. DIFFERENTIATED COLOR, MATERIALS, AND TRIM TO DISTRINGUISH THE BUILDING'S VERTICAL AND HORIZONTAL BODY MASSING.
2. TREE AND SHRUB LANDSCAPING AROUND THE BUILDING TO PROVIDE FEELS FROM SCALE, ENHANCED WALKWAYS, SCREENING AND PRIVACY TO THE DWELLING UNITS.
3. MASS BREAKS AND USE OF VARIOUS SIDING EXPRESSES THE INDIVIDUAL CHARACTER OF DWELLING UNITS. SIDING ELEMENTS REPERFORM THE CHAFTSMAN ECLECTIC STYLE AND SUPPORTED WITH AMERICAN FARMHOUSE DESIGN ACCENTS.
4. ARTICULATION ENTRANCES, WOOD LEAVES CORBELS, WINDOW BULKHEADS, WALL TRIMS, MULTIPLE COLORS, VARIOUS ROOF LINES AND BALCONY'S FINISHES ADD VISUAL INTEREST AND CHARACTER.

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 638 COLUMBIA ST, SUITE 900
 SAN DIEGO, CALIF. 92101 619 235-2296 FX 619 235-2396 FAX

BLDG. I - EXTERIOR ELEVATIONS

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
A	1	06/07/24	A		

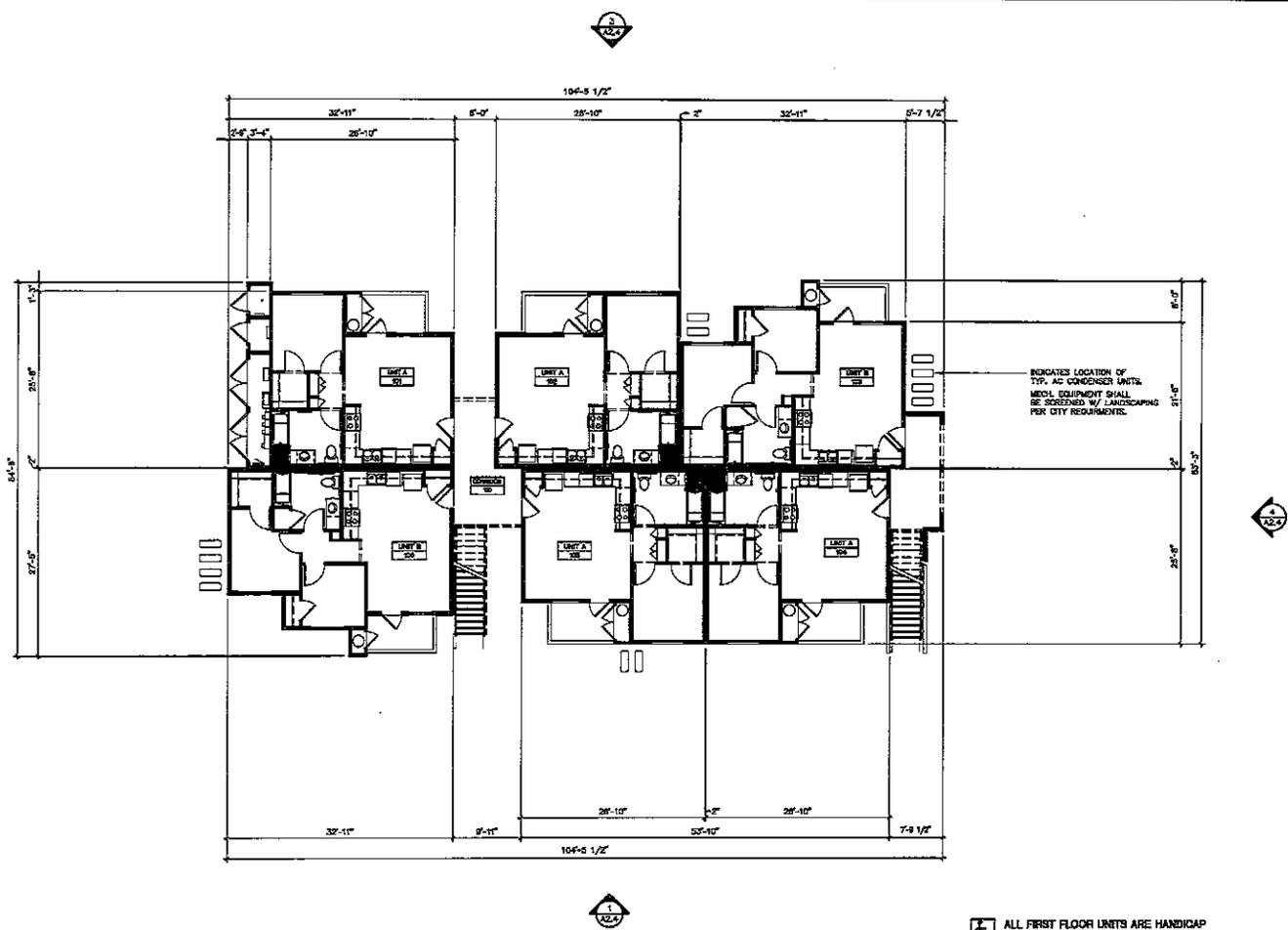
DATE: JUNE 21, 2024

JOB NO. _____

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CHECKED _____

A1.5



BLDG. II - FIRST FLOOR PLAN

BUILDING CONSTRUCTION TYPE V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

ALL FIRST FLOOR UNITS ARE HANDICAP ADAPTABLE AND ACCESSIBLE UNITS

8,952 TOTAL BLDG. SF.

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 230 COLUMBIA ST, SUITE 100
 SAN DIEGO, CALIF. 92101 (619) 233-2826 FAX: (619) 233-2866 WAC

BLDG. II - 1ST FLOOR PLAN

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE
▲	1	UPDATED PLAN	05/27/24	▲			
▲				▲			
▲				▲			

DATE: JUNE 21, 2024

JOB NO.:

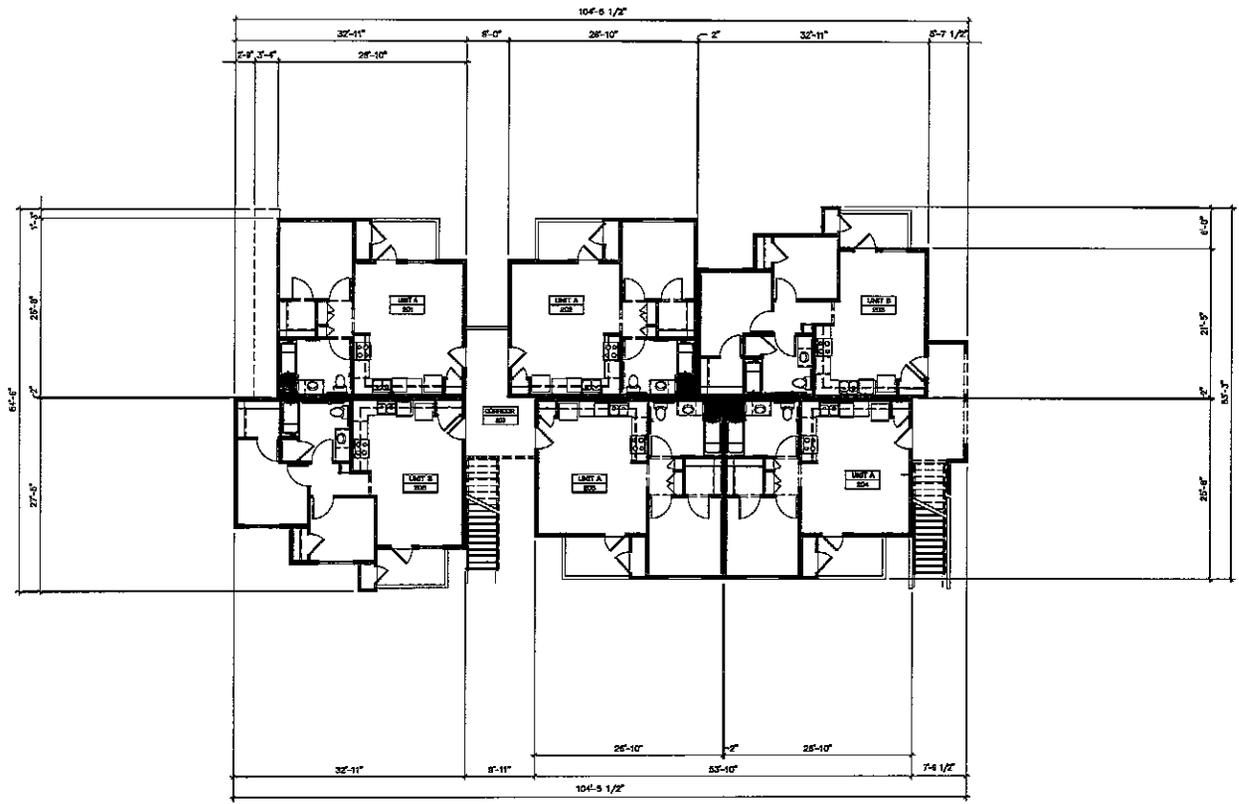
DRWN:

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A2.1

ALL WORK SHOWN HEREON IS BASED ON INFORMATION PROVIDED BY THE CLIENT. THE ARCHITECT ASSUMES NO LIABILITY FOR THE ACCURACY OF THE INFORMATION PROVIDED BY THE CLIENT. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED BY THE CLIENT. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED BY THE CLIENT. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED BY THE CLIENT.

ALL EXISTING CONDITIONS, DIMENSIONS, & PLANT LOCATIONS SHOWN ON THIS DRAWING ARE BASED ON THE INFORMATION PROVIDED BY THE OWNER. THE ARCHITECTS AND PLANNERS, INC. HAS CONDUCTED VISUAL VERIFICATION OF THE INFORMATION PROVIDED. THE ARCHITECTS AND PLANNERS, INC. HAS CONDUCTED VISUAL VERIFICATION OF THE INFORMATION PROVIDED. THE ARCHITECTS AND PLANNERS, INC. HAS CONDUCTED VISUAL VERIFICATION OF THE INFORMATION PROVIDED. THE ARCHITECTS AND PLANNERS, INC. HAS CONDUCTED VISUAL VERIFICATION OF THE INFORMATION PROVIDED.



BLDG. II - SECOND FLOOR PLAN

8,952 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

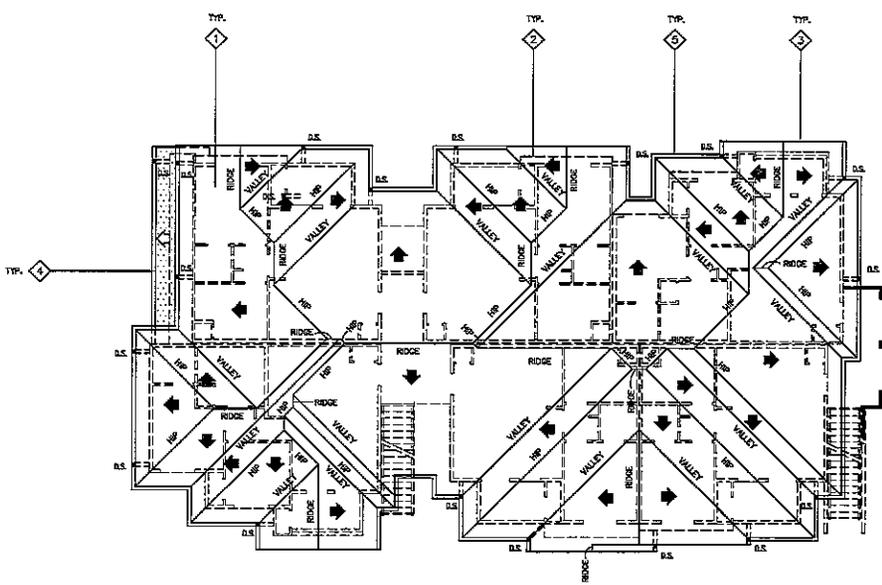
WAKELAND HOUSING AND DEVELOPMENT CORP.
 12500 COLIMA BLVD., SUITE 100
 SAN DIEGO, CALIF. 92121
 (619) 521-2266 FAX: (619) 521-2268

BLDG. II - 2ND FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
▲			▲		
▲			▲		
▲			▲		

DATE	JUNE 21, 2024
JOB NO.	
DRAWN	
CHECKED	

A2.2



TYP. ROOF LEGEND & NOTES

- 1 CONG. FLAT TILE AT SLOPED ROOFS
- 2 LINE OF BUILDING WALL, BELOW
- 3 LINE OF ROOF OVERHANG
- 4 LINE OF ROOF OVERHANG, BELOW
- 5 LINE OF METAL ROOF GLITTER
- 6 EXPOSED WOOD/METAL TRELLIS MEMBERS
- ▲ INDICATES DIRECTION OF SLOPED ROOF
- ◄ INDICATES DIRECTION OF LOWER SLOPED ROOF
- ▨ INDICATES LOWER ROOF AREA
- D.S. INDICATES DOWNSPOUT LOCATION

NOTES:
 PITCHED ROOF SLOPE SHALL BE 4 : 12 MIN.

ROOF PLAN

BUILDING TYPE II - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 620 CALLEMAN PL. SUITE 100
 SAN DIEGO, CALIF. 92101
 (619) 225-2266 FAX (619) 225-2266

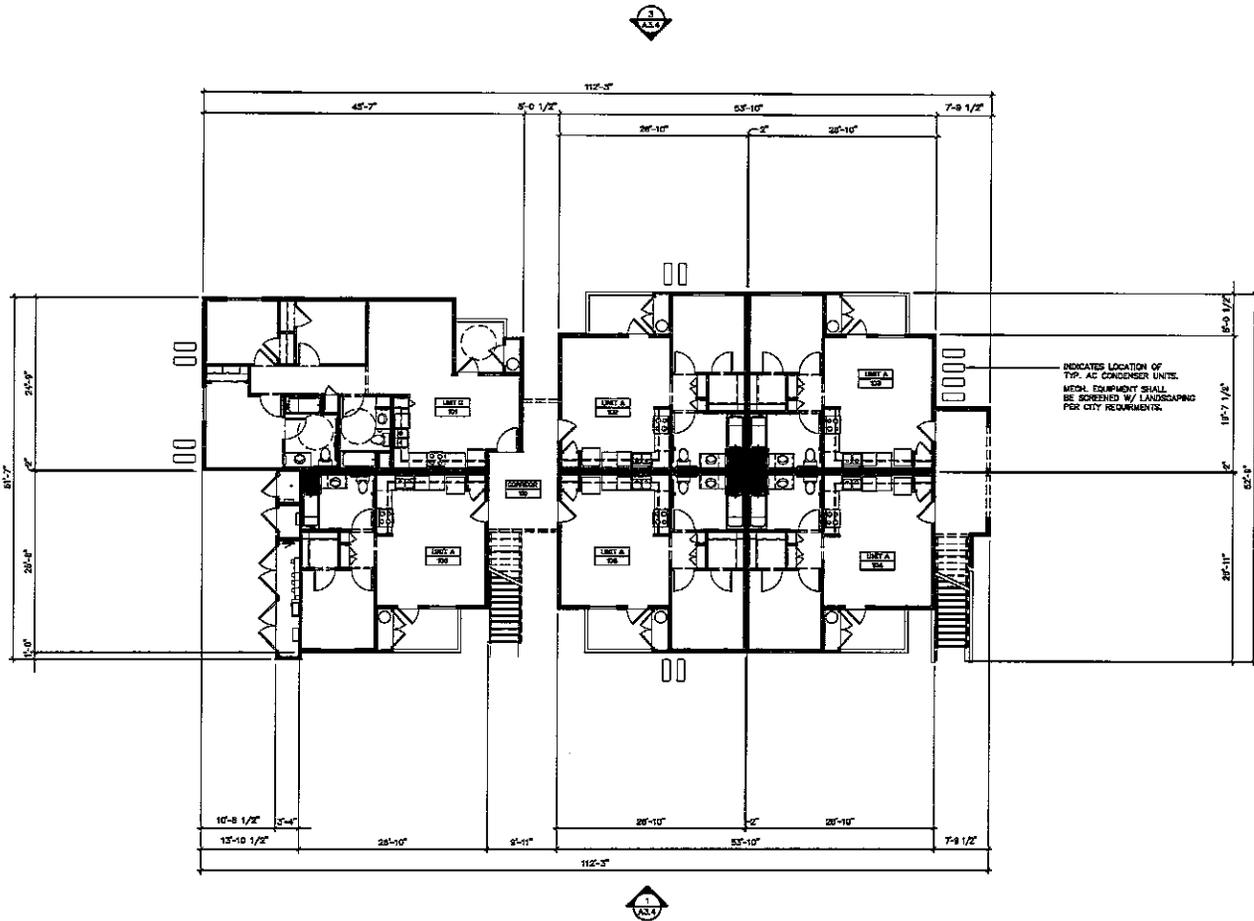
BLDG. II - ROOF PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
▲			▲		
▲			▲		
▲			▲		

DATE	JUNE 21, 2024
DWG. NO.	
DESIGN	
CHECKED	

A2.3

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ALL FIRST FLOOR UNITS ARE HANDICAP ADAPTABLE AND ACCESSIBLE UNITS

BLDG. III - FIRST FLOOR PLAN

9,393 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 100 COLUMBIA ST, SUITE 100
 SAN DIEGO, CALIF. 92101
 619 225-2525 FAX: 619 225-3836

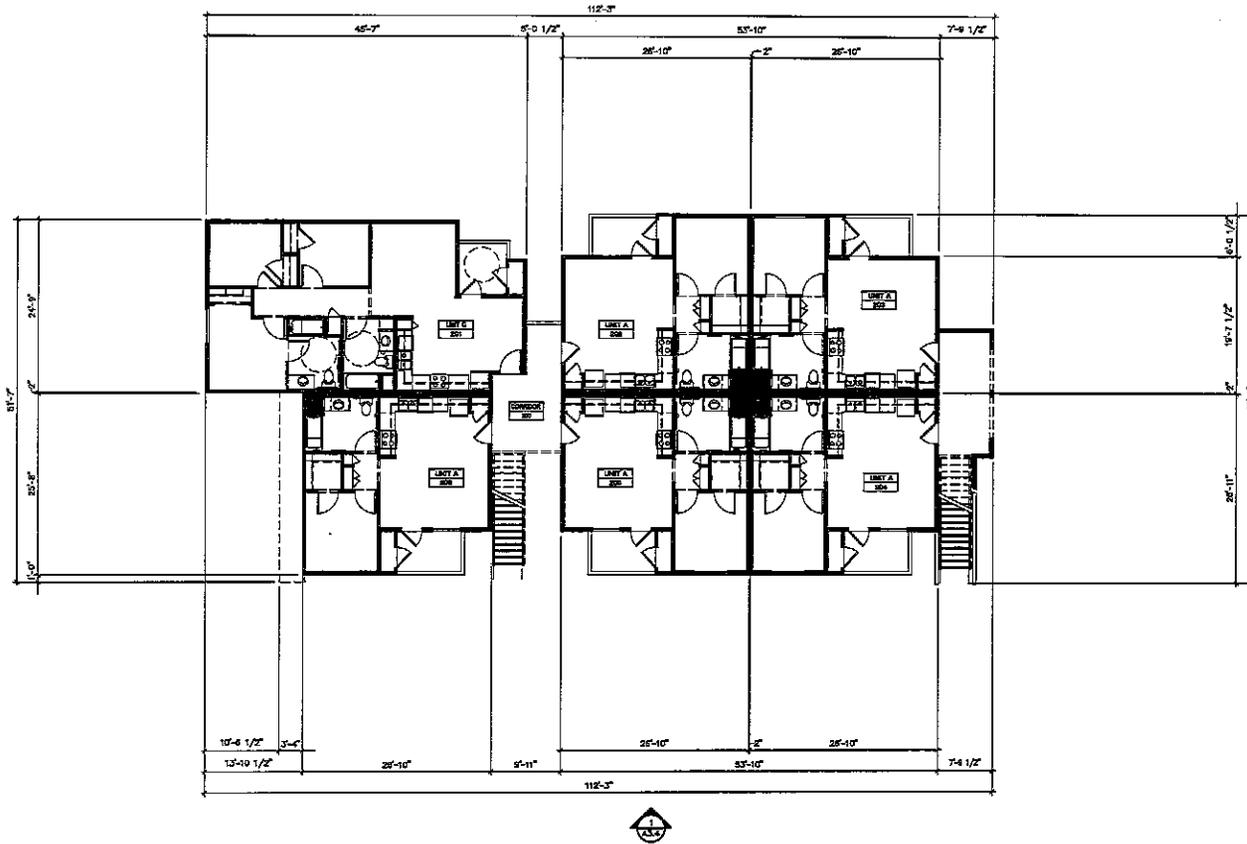
BLDG. III - 1ST FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
1	UPDATED PLAN	06/20/24			

DATE	JUNE 21, 2024
JOB NO.	
OWNER	
DESIGNER	

A3.1

ALL TRADES, MATERIALS, MANUFACTURES & FINISHES SHOWN ON THESE PLANS ARE BASED ON THE ASSUMPTIONS OF THE ARCHITECT. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED ON THESE PLANS. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED ON THESE PLANS. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED ON THESE PLANS. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED ON THESE PLANS.



BLDG. III - SECOND FLOOR PLAN

9,393 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. SAN COLUMBA ST. SUITE 900
 SAN DIEGO, CALIF. 92108
 (619) 253-2828 FAX: (619) 253-0636

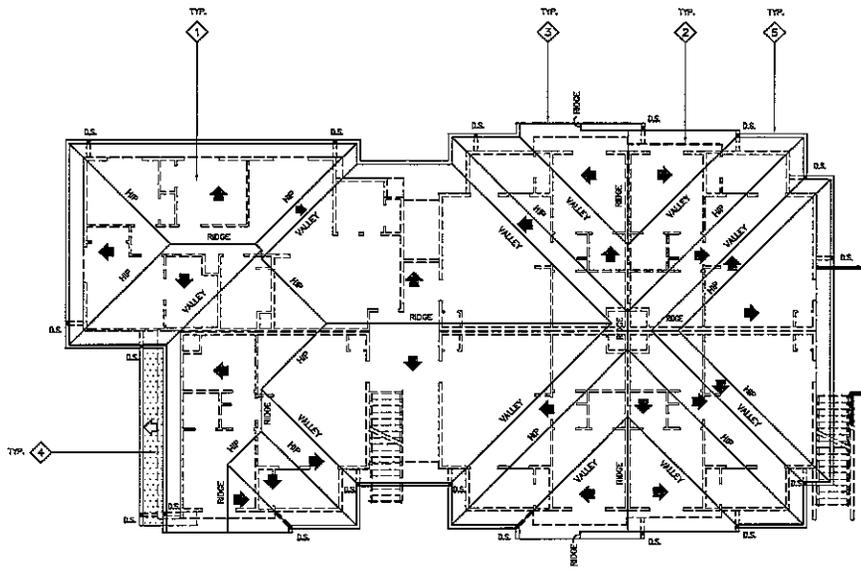
BLDG. III - 2ND FLOOR PLAN

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE

DATE:
 DRAWN BY:
 CHECKED BY:

A3.2

THIS DOCUMENT IS THE PROPERTY OF RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC. AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC. THE USER SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPROPRIATE AGENCIES.



TYP. ROOF LEGEND & NOTES

- ① DRWG. FLAT TILE AT SLOPED ROOFS
- ② LINE OF BUILDING WALL, BELOW
- ③ LINE OF ROOF OVERHANG
- ④ LINE OF ROOF OVERHANG, BELOW
- ⑤ LINE OF METAL ROOF CLUTTER
- ⑥ EXPOSED WOOD/METAL TRELLIS MEMBERS
- ▲ INDICATES DIRECTION OF SLOPED ROOF
- ◀ INDICATES DIRECTION OF LOWER SLOPED ROOF
- ▨ INDICATES LOWER ROOF AREA
- D.S. INDICATES DOWNSOUT LOCATION

NOTES:
 PITCHED ROOF SLOPE SHALL BE 4 : 12 MIN.

ROOF PLAN

BUILDING TYPE III - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 1320 COLUMBIA DR., SUITE 900
 SAN DIEGO, CALIF. 92101
 (619) 233-2996 FAX (619) 233-2996

BLDG. III - ROOF PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE

DATE: **JUNE 21, 2024**

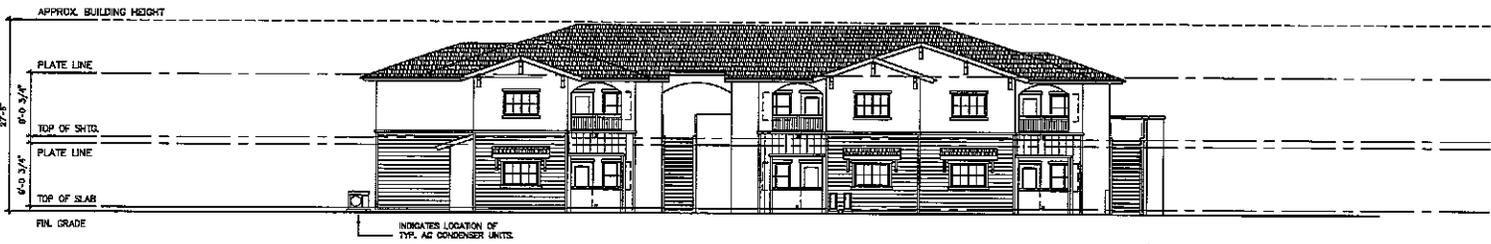
JOB NO. _____

DESIGN _____

CHECKED _____

A3.3

ALL WORK, DESIGN, CONSTRUCTION & PLANS PROVIDED BY CONTRACTOR TO BE COMPLETED BY THE CONTRACTOR. CONTRACTOR SHALL VERIFY ALL DIMENSIONS & CONDITIONS ON THE JOB. IN THE EVENT ANY DISCREPANCY OR CONFLICT IS FOUND, THE CONTRACTOR SHALL BE RESPONSIBLE FOR RESOLUTION. CONTRACTOR SHALL VERIFY ALL DIMENSIONS & CONDITIONS ON THE JOB. IN THE EVENT ANY DISCREPANCY OR CONFLICT IS FOUND, THE CONTRACTOR SHALL BE RESPONSIBLE FOR RESOLUTION. CONTRACTOR SHALL VERIFY ALL DIMENSIONS & CONDITIONS ON THE JOB. IN THE EVENT ANY DISCREPANCY OR CONFLICT IS FOUND, THE CONTRACTOR SHALL BE RESPONSIBLE FOR RESOLUTION.



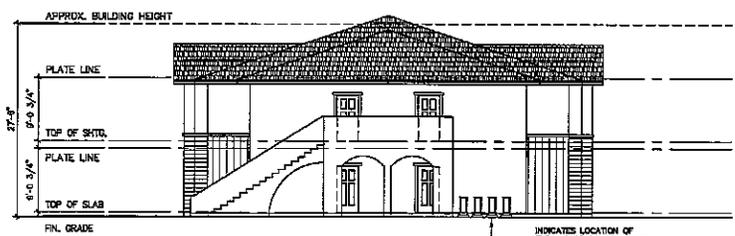
EXTERIOR ELEVATION 1
 BUILDING TYPE III - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 2
 BUILDING TYPE III - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 3
 BUILDING TYPE III - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 4
 BUILDING TYPE III - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"

TYPICAL EXTERIOR FINISHES

- CONG. FLAT TILE AT SLOPED ROOFS
ROOF PITCH SHALL BE 12:12
- EXTERIOR STUCCO WALL FINISH
- EXC. GEMMETTERED SIDING WALL FINISH
- EXPOSED WOOD CORNICES
- WOOD WINDOW CANDLES
- EXPOSED WOOD/STAL. TRUSS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD FRENCH DOORS
- VINYL FRAMED WINDOWS
- WOOD WINDOW/DOOR/WALL TRIMS
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCCO/SIDING COLOR RANGE, SUCH AS:
 - WARM GREY
 - WARM SIENNA COLOR
 - BURNT COBRE EARTH TONE
 - WARM / OFF-WHITES
 - EARTH GREEN / OLIVE
 - WARM CHOCOLAD
- METAL RAILINGS ADJACENT COLOR RANGE, SUCH AS:
 - SLATE ORANGE / VERMILION
 - SLATE GREEN / SADE
 - CLEAR FLUMULIN
 - WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A CRAFTSMAN ECLECTIC DESIGN CONSISTING OF NEUTRAL BROWN, TAN, BLUE AND RED COLORS. THE PROJECT WILL INCLUDE TWO, THREESTORY APARTMENT & COMMON BUILDINGS WITH VARIOUS HEIGHTS OF APPROXIMATELY 30 TO 37'. THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:

1. DIFFERENTIATED COLOR, MATERIALS, AND TRIM TO DISTINGUISH THE BUILDINGS VERTICAL AND HORIZONTAL BODY MASSING.
2. TREE AND SHRUBS LANDSCAPING AROUND THE BUILDING TO PROVIDE PEDESTRIAN SCALE, ENHANCED VISIBILITY, SCREENING AND PRIVACY TO THE DWELLING UNITS.
3. MASS BREAKS AND USE OF VARIOUS SIDING EXPRESSES THE INDIVIDUAL CHARACTER OF DWELLING UNITS. SIDING ELEMENTS REINFORCE THE CRAFTSMAN ECLECTIC STYLE AND SUPPORTED WITH AMERICAN FARMHOUSE DESIGN ACCENTS.
4. ARTICULATION ENTRANCES, WOOD SAWS COMBES/SHROUD WALLINGS, WALL TRIM, MULTIPLE COLORS, VARIOUS ROOF LINES AND BALCONIES / PATIOS ADD VISUAL INTEREST AND CHARACTER.

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 100 COLUMBIA ST, SUITE 300
 SAN DIEGO, CALIF. 92101
 PH: 760-225-2600 FAX: 760-236-8600

BLDG. III - EXTERIOR ELEVATIONS

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE
▲	1	UPDATED PLAN	06/20/24	▲			
▲				▲			

DATE: JUNE 21, 2024

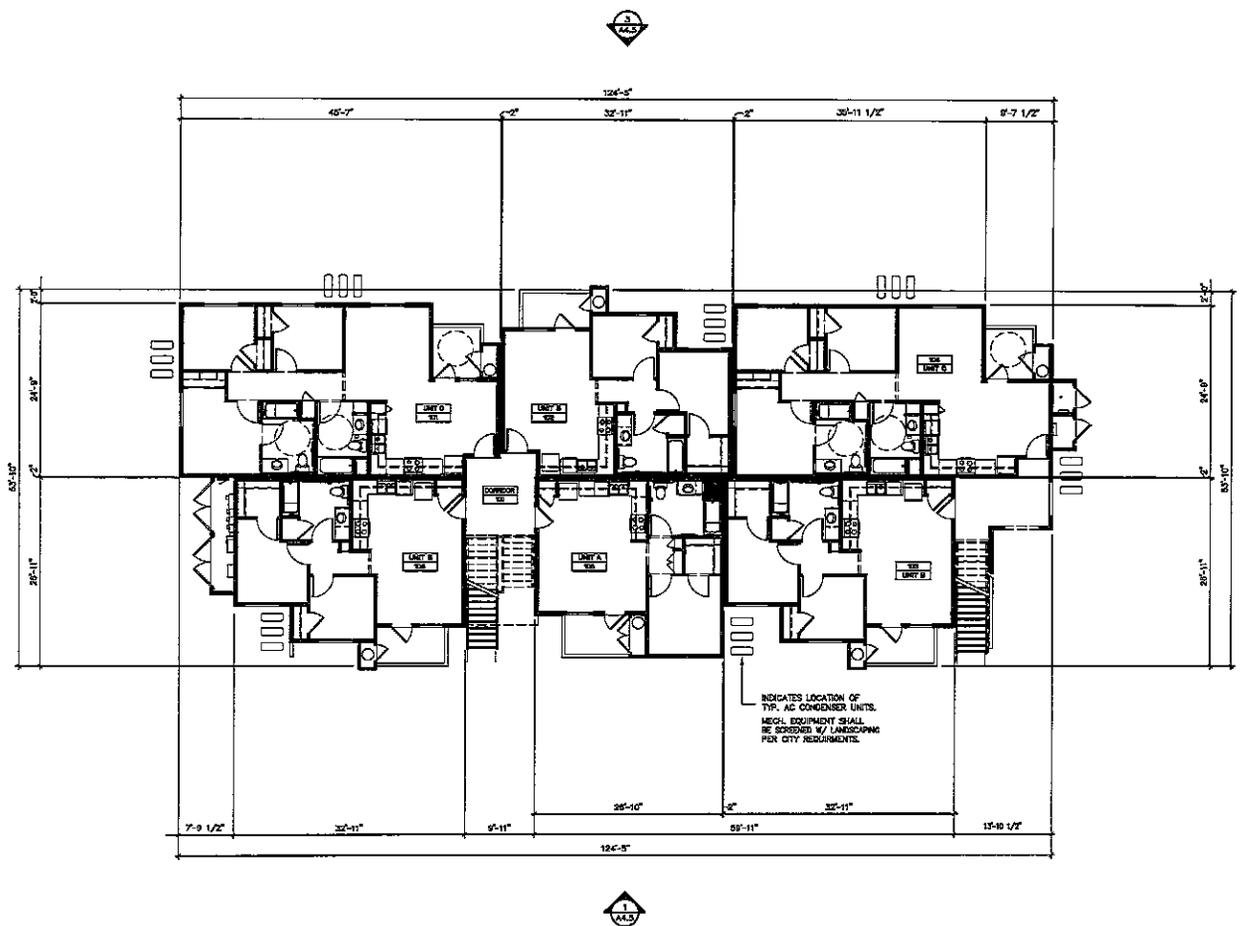
JOB NO.:

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A3.4

ALL SCALE, DIMENSIONS, FINISHES & MATERIALS ARE AS SHOWN UNLESS OTHERWISE SPECIFIED. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL NECESSARY PERMITS AND REGULATIONS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL NECESSARY PERMITS AND REGULATIONS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL NECESSARY PERMITS AND REGULATIONS.



KA RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC.
 3841 TWIN TREES DRIVE, PO BOX 722260, SAN DIEGO, CA 92172 TEL: 619 544 6891

BLDG. IV - FIRST FLOOR PLAN

14,190 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

ALL FIRST FLOOR UNITS ARE HANDICAP ADAPTABLE AND ACCESSIBLE UNITS

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 100 COLUMBIA ST, SUITE 100
 SAN DIEGO, CALIF. 92101
 619 234 2525 FAX 619 234 2666

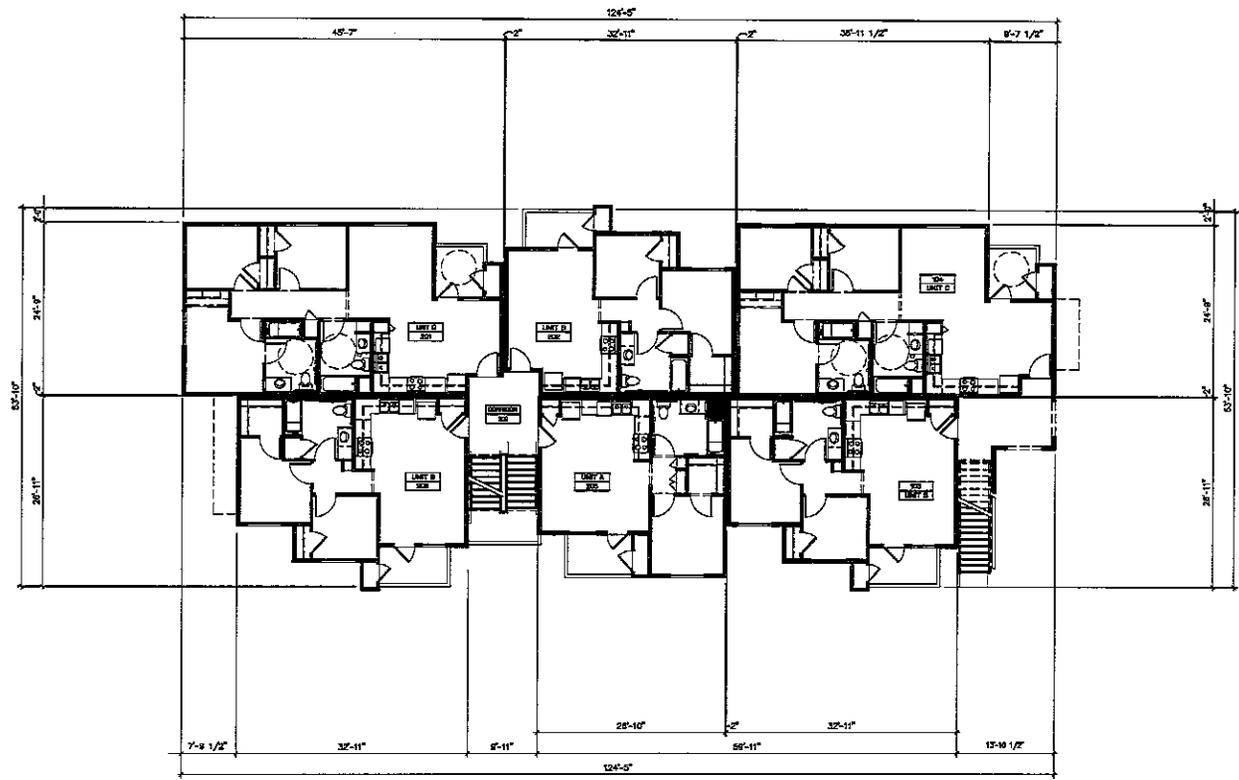
BLDG. IV - 1ST FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
1	UPDATED PLAN	06/27/24			

DATE: JUNE 21, 2024
 JOB NO.:
 DRAWN:
 CHECKED:

A4.1

ALL TRADES, CONTRACTORS & SUBS SHOULD BE ADVISED BY THE DRAWING OR OTHERWISE BY THE ARCHITECTS & PLANNERS, INC. & WAKELAND HOUSING AND DEVELOPMENT CORP. OF ANY CHANGES TO THE PROJECT. THE ARCHITECTS & PLANNERS, INC. & WAKELAND HOUSING AND DEVELOPMENT CORP. SHALL BE RESPONSIBLE FOR ALL CONDITIONS & CONDITIONS ON THE JOB. IN THE EVENT OF ANY CHANGES TO THE PROJECT, THE ARCHITECTS & PLANNERS, INC. & WAKELAND HOUSING AND DEVELOPMENT CORP. SHALL BE RESPONSIBLE FOR THE CHANGES. THE ARCHITECTS & PLANNERS, INC. & WAKELAND HOUSING AND DEVELOPMENT CORP. SHALL BE RESPONSIBLE FOR THE CHANGES. THE ARCHITECTS & PLANNERS, INC. & WAKELAND HOUSING AND DEVELOPMENT CORP. SHALL BE RESPONSIBLE FOR THE CHANGES.



BLDG. IV - SECOND FLOOR PLAN

14,180 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 228 COLLEAVILLE, SUITE 200
 SAN DIEGO, CALIF. 92101
 619 252-0861 FAX 619 252-0862

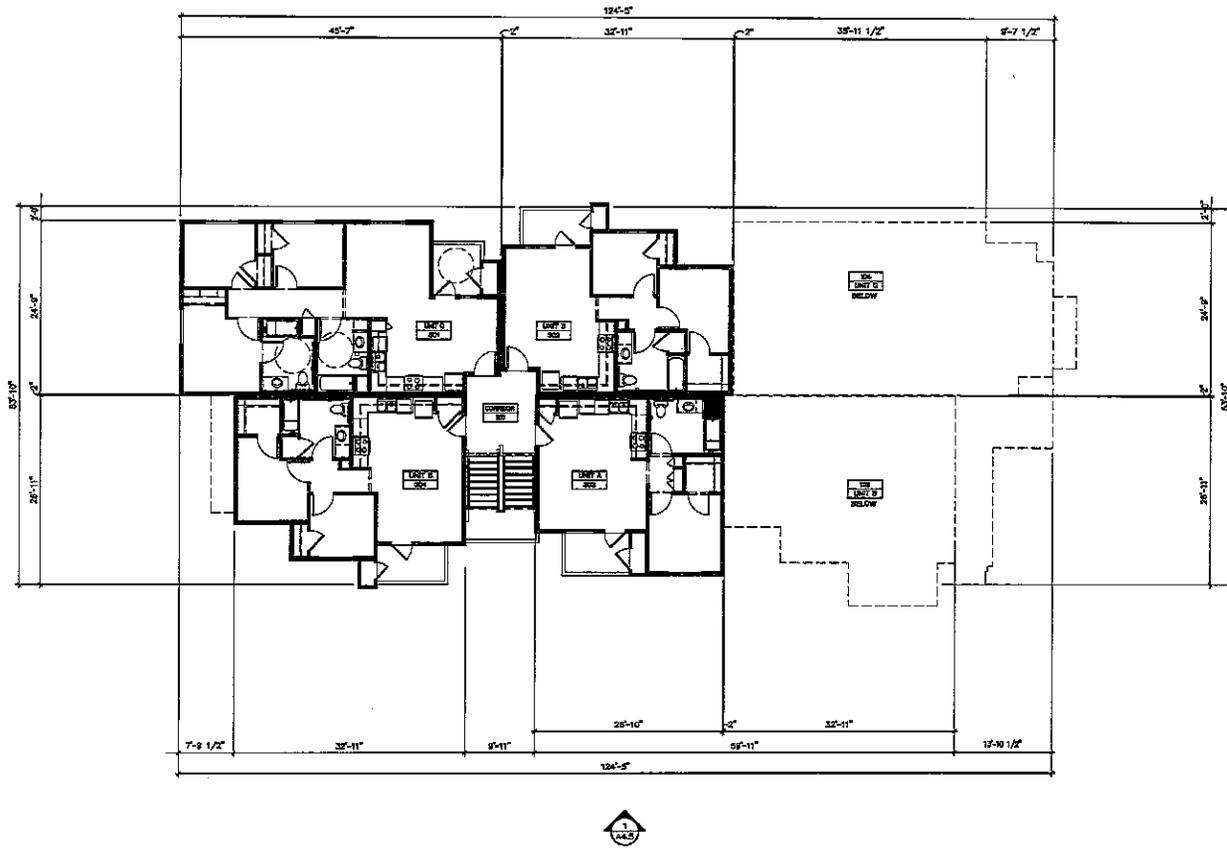
BLDG. IV - 2ND FLOOR PLAN

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE
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A				A			
A				A			

DATE	JUNE 21, 2024
JOB NO.	
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A4.2

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BLDG. IV - THIRD FLOOR PLAN

14,190 TOTAL BLDG. S.F.

BUILDING CONSTRUCTION TYPE: V-A: 1-HR FIRE RATED FIRE SPRINKLERS: 13R

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1000 COLLETONS BLVD, SUITE 1000
 SAN DIEGO, CALIF. 92108 (619) 255-2244 PH: (619) 255-2244 FAX

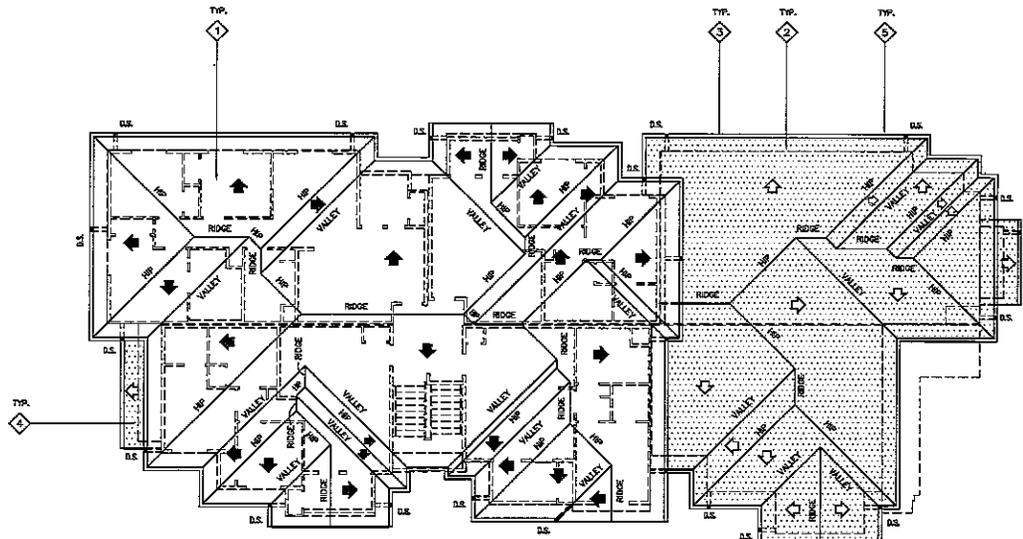
BLDG. IV - 3RD FLOOR PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
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DATE: JUNE 21, 2024
 JOB NO.:
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 CHECKED:

A4.3

ALL DIMENSIONS SHOWN ARE APPROXIMATE AND SHOWN FOR INFORMATION ONLY. THE ARCHITECT ASSUMES NO LIABILITY FOR THE ACCURACY OF THE DIMENSIONS SHOWN. THE ARCHITECT SHALL BE USED IN ACCORDANCE WITH THE STANDARD CONTRACT DOCUMENTS FOR ARCHITECTS AND PLANNERS, INC. THE ARCHITECT SHALL BE USED IN ACCORDANCE WITH THE STANDARD CONTRACT DOCUMENTS FOR ARCHITECTS AND PLANNERS, INC. THE ARCHITECT SHALL BE USED IN ACCORDANCE WITH THE STANDARD CONTRACT DOCUMENTS FOR ARCHITECTS AND PLANNERS, INC.



TYP. ROOF LEGEND & NOTES

- 1 CONG. FLAT TILE AT SLOPED ROOFS
- 2 LINE OF BUILDING WALL, BELOW
- 3 LINE OF ROOF OVERHANG
- 4 LINE OF ROOF OVERHANG, BELOW
- 5 LINE OF METAL ROOF GLITTER
- 6 EXPOSED WOOD/METAL TRUSS MEMBERS
- ↖ INDICATES DIRECTION OF SLOPED ROOF
- ↙ INDICATES DIRECTION OF LOWER SLOPED ROOF
- [Hatched Pattern] INDICATES LOWER ROOF AREA
- D.S. INDICATES DOWNSPOUT LOCATION

NOTES:
 PITCHED ROOF SLOPE SHALL BE 4 : 12 MIN.

ROOF PLAN

BUILDING TYPE IV - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1200 COLUMBIA ST., SUITE 900
 SAN DIEGO, CALIF. 92101
 619 234-2826 FAX 619 234-2836

BLDG. IV - ROOF PLAN

REV.	NO.	DESCRIPTION	DATE	REV.	NO.	DESCRIPTION	DATE

DATE: JUNE 21, 2024

JOB NO. _____

DRAWN _____

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A4.4

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EXTERIOR ELEVATION 1

BUILDING TYPE IV - 1-HR FIRE RATED

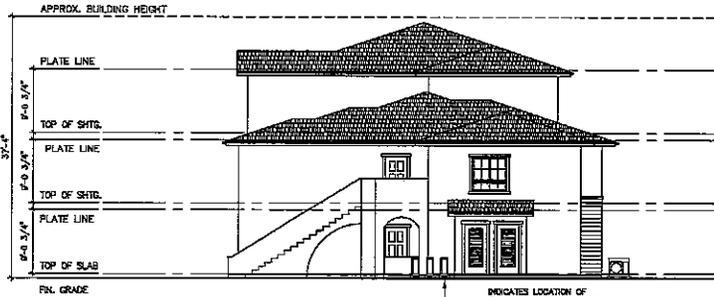
SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 2

BUILDING TYPE IV - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 4

BUILDING TYPE IV - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"



EXTERIOR ELEVATION 3

BUILDING TYPE IV - 1-HR FIRE RATED

SCALE: 1/8" = 1'-0"

TYPICAL EXTERIOR FINISHES

- CONIC FLAT TREES AT SLOPED ROOFS
- ROOF PITCH SHALL BE 12:12
- EXTERIOR STUCCO WALL FINISH
- EXT. CEMENTITIOUS SIDING WALL FINISH
- EXPOSED WOOD CORBELS
- WOOD WINDOW CANOPES
- EXPOSED WOODSMITH TRUSS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD EXTERIOR WINDOWS
- VINYL FRAMED WINDOWS
- WOOD WINDOW/DOOR/FRAMING
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCCO COLOR RANGE, SUCH AS:
 - WARM GRAY
 - WASH SIENNA OCKER
 - BURNY OCHRE SAND TONE
 - WARM / OFF-WHITES
 - EARTH GREEN / OLIVE
 - WARM CHARCOAL
- METAL RAILINGS ACCENT COLOR RANGE, SUCH AS:
 - SLATE ORANGE / VERMILION
 - SLATE GREEN / SAGE
 - CLEAR ALUMINUM
 - WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A COORDINATED SELECTION OF COLOR COMBINATIONS OF NEUTRAL BROWN, TAN, BLUE AND RED COLORS. THE PROJECT INCLUDES ONE, TWO, THREE-BEDROOM APARTMENT & COMMON BUILDINGS WITH VARIOUS HEIGHTS OF APPROXIMATELY 28' TO 32'.

THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:

1. DIFFERENTIATED COLOR, MATERIALS, AND TRIM TO DISTINGUISH THE BUILDING'S VERTICAL AND HORIZONTAL BODY MASSING.
2. TREE AND SHRUB LANDSCAPING AROUND THE BUILDING TO PROVIDE PEDESTRIAN SCALE, ENHANCED WALKWAYS, SCREENING AND PROXIMITY TO THE DWELLING UNITS.
3. MASS BREAKS AND USE OF VARIOUS SIDING EXPRESSED THE INDIVIDUAL CHARACTER OF DWELLING UNITS. SIDING SELECTIONS HIGHLIGHT THE CRAFTSMAN ELECTRIC STYLE AND SUPPORTED WITH AMERICAN FARMHOUSE DESIGN ACCENTS.
4. ARTICULATION ENTRANCES, WOOD BEAMS CORBELS WINDOW MULLIONS, WALL TRIM, MULTIPLE COLORS, VARIOUS ROOF LINES AND BALCONIES / PATIOS ADD VISUAL INTEREST AND CHARACTER.

CAMINO TERRACE APARTMENTS
JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 2800 COLLEMA RD, SUITE 100
SAN DIEGO, CA 92108
619 225-2294 FAX 619 225-2295

BLDG. IV - EXTERIOR ELEVATIONS

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
A	1	06/07/24	A		
A			A		
A			A		

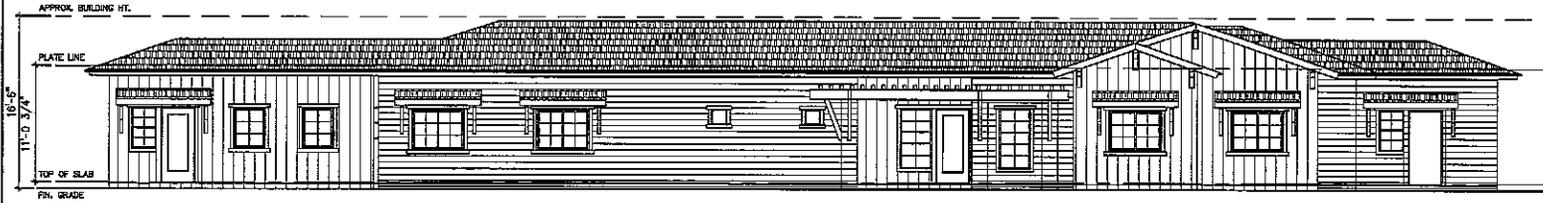
DATE: JUNE 21, 2024

JOB NO.:

DRWN:

CHECKED:

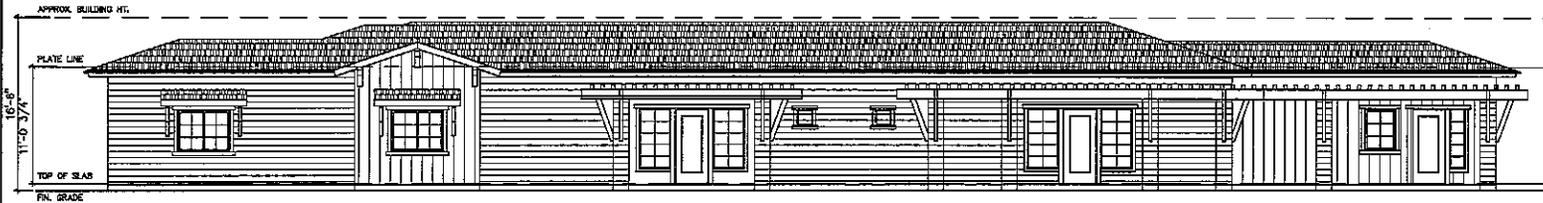
A4.5



EXTERIOR ELEVATION 1

COMMUNITY BUILDING

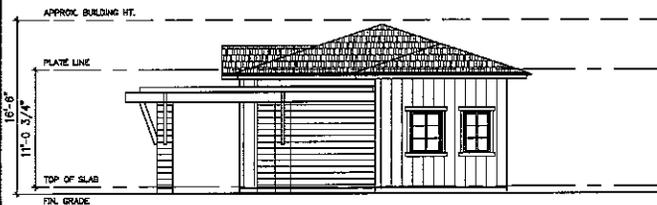
SCALE: 3/16" = 1'-0"



EXTERIOR ELEVATION 3

COMMUNITY BUILDING

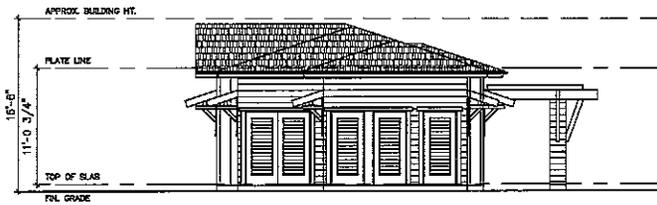
SCALE: 3/16" = 1'-0"



EXTERIOR ELEVATION 2

COMMUNITY BUILDING

SCALE: 3/16" = 1'-0"



EXTERIOR ELEVATION 4

COMMUNITY BUILDING

SCALE: 3/16" = 1'-0"

TYPICAL EXTERIOR FINISHES

- CONCL. FLAT TILE AT SLOPED ROOFS
- ROOF FITTINGS SMALL BIL. COE
- EXTERIOR STUCO/CEMENT WALL FINISH
- EXTE. GEMENTITIOUS SIDING WALL FINISH
- EXPOSED WOOD CORNICES
- WOOD WINDOW CANOPIES
- EXPOSED WOOD/METAL TRUSS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD FINISH DOORS
- VINYL FRAMED WINDOWS
- WOOD WINDOW/DOOR WALL TRIMS
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCO/CEMENT COLOR RANGE, SUCH AS:
 - WARM GRAY
 - WARM SIENNA COLOR
 - BURNT OCHRE EARTH TONE
 - WARM / OFF-WHITES
 - EARTH GREEN / OLIVE
 - WARM CHARCOAL
- METAL RAILINGS ACCENT COLOR RANGE, SUCH AS:
 - SLATE ORANGE / VERMILION
 - SLATE GREEN / SAGE
 - CLEAR ALUMINUM
 - WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A "CRAFTSMAN ECLECTIC" DESIGN CONSISTING OF NEUTRAL BROWN, TAN, BLUE AND RED COLORS. THE PROJECT INCLUDES ONE, TWO, THREE-STORY APARTMENT & COMMON BUILDINGS WITH VARIOUS HEIGHTS OF APPROXIMATELY 8' TO 37'.

THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:

1. DIFFERENTIATED COLOR, MATERIALS, AND TRIM TO DISTINGUISH THE BUILDINGS VERTICAL AND HORIZONTAL BODY MEMBERS.
2. TREE AND SHRUB LANDSCAPING AROUND THE BUILDING TO PROVIDE PEDESTRIAN SCALE, ENHANCED WALKWAYS, SCREENING AND PRIVACY TO THE DWELLING UNITS.
3. MASS BREAKS AND USE OF VARIOUS SIDING EXPRESSES THE INDIVIDUAL CHARACTER OF DWELLING UNITS. SIDING ELEMENTS REINFORCE THE CRAFTSMAN ELECTRIC STYLE AND SUPPORTED WITH AMERICAN FURNITURE DESIGN ACCENTS.
4. ARTICULATION ENTRANCES, WOOD RAFTERS CORRELATION BUILDINGS, VERTICAL TRIM, MULTIPLE COLORS, VARIOUS ROOF LINES AND BALCONIES/PATIOS ADD VISUAL INTEREST AND CHARACTER.

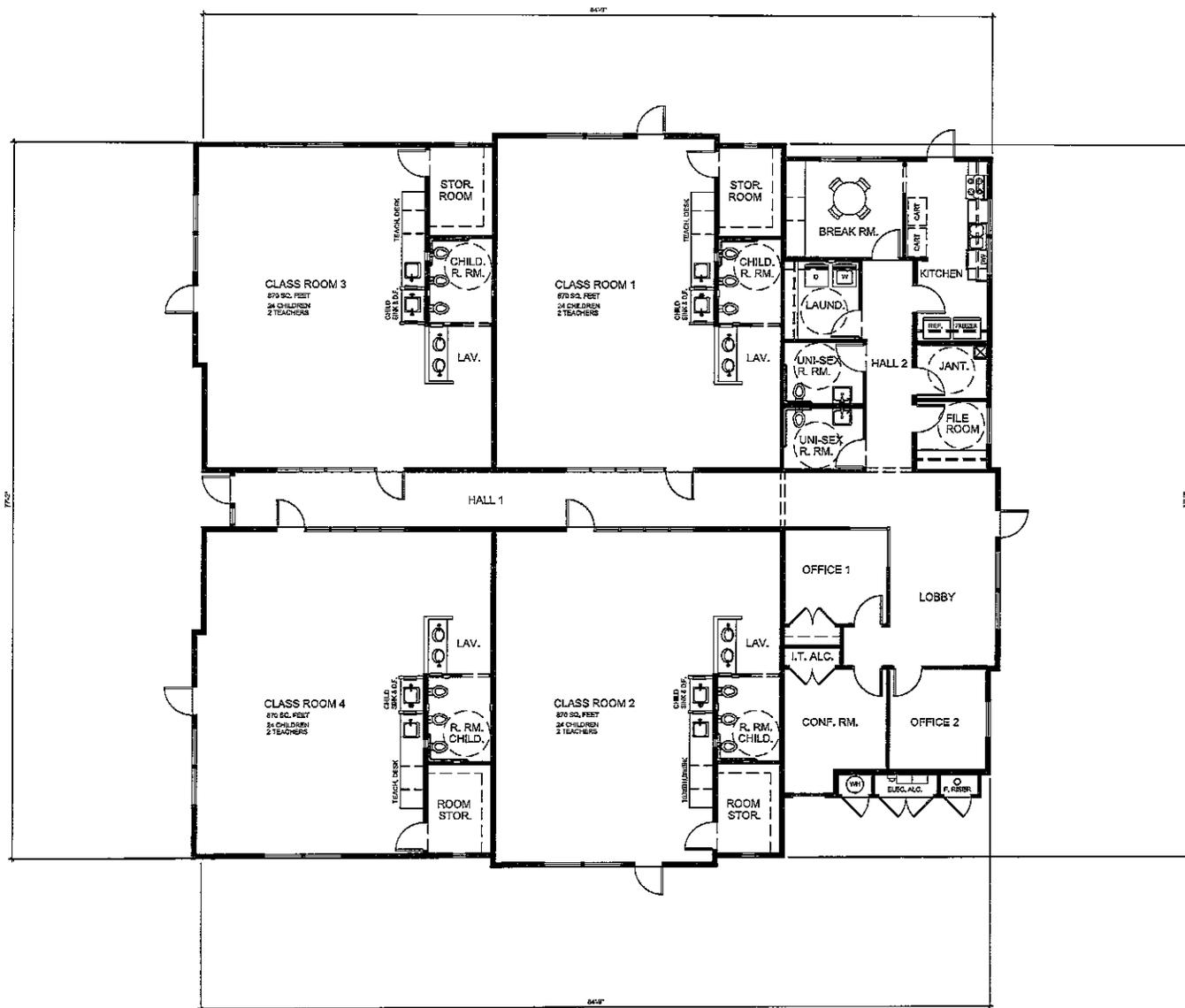
CAMINO TERRACE APARTMENTS
 JUBILPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 330 COLLEEN BL. SUITE 400
 SAN DIEGO, CALIF. 92107
 (619) 255-2296 FAX: (619) 255-2286

COMMUNITY BLDG. - EXT. ELEV.

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DATE: JUNE 21, 2024	A5.3
JOB NO.:	
DESIGN:	
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FLOOR PLAN

DAYCARE BUILDING 96 CHILDREN

BUILDING SHALL BE HANDICAP ACCESSIBLE

6,463 SQ. FT.

SCALE: 3/8" = 1'-0"

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 3225 CALABAZASTO, SUITE 300
 SAN DIEGO, CALIF. 92121 619 235-0299 FAX 619 235-0296 5342

DAYCARE BLDG. - FLR. PLN.

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DATE: JUNE 21, 2024
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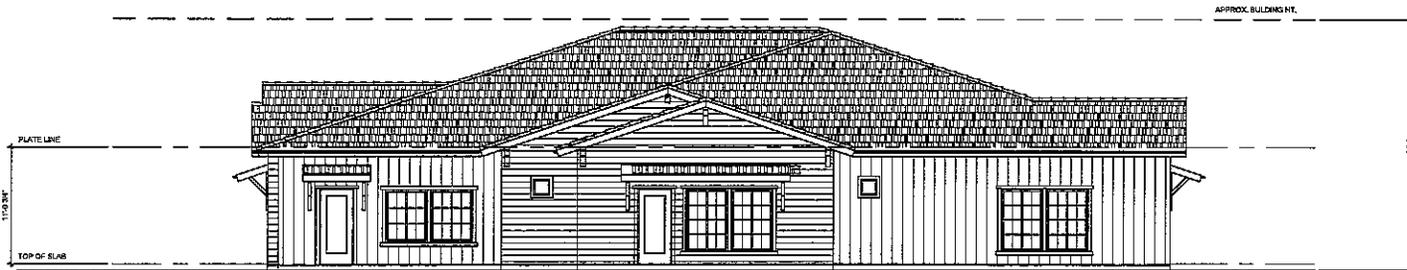
ALL EXTRA WORK, AMENDMENTS & PLANS INDICATED OR INDICATED BY THE DRAWING ARE OWNED BY THE DRAWING AND NOT TO BE REPRODUCED OR REPRODUCED BY ANY OTHER PARTY WITHOUT THE WRITTEN PERMISSION OF RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC. THE ARCHITECTS ASSOCIATES ARCHITECTS & PLANNERS, INC. IS NOT RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED IN THESE DOCUMENTS. CONSTRUCTION SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL MATERIALS & CONSTRUCTION OF THE WORK. IT IS THE USER'S RESPONSIBILITY TO VERIFY THAT ALL INFORMATION IS CORRECT AND COMPLETE. THE ARCHITECTS ASSOCIATES ARCHITECTS & PLANNERS, INC. IS NOT RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED IN THESE DOCUMENTS.



EXTERIOR ELEVATION 1

DAYCARE BUILDING

SCALE: 3/16" = 1'-0"



EXTERIOR ELEVATION 2

DAYCARE BUILDING

SCALE: 3/16" = 1'-0"

TYPICAL EXTERIOR FINISHES

- CONCL. FLAT TILE AT SLOPED ROOFS
- ROOF PITCH SHALL BE 4:12
- EXTERIOR STUCCO WALL FINISH
- EXT. CONCRETE TILE SIDING WALL FINISH
- EXPOSED WOOD CORBELS
- WOOD WINDOW CANOPES
- EXPOSED WOOD RAFTER TRUSS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD FRENCH DOORS
- VINYL FRAMED WINDOWS
- WOOD VENEO WOOD RAILINGS
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCCO COLOR RANGE, SUCH AS:
 - WARM GRAY
 - WARM BEIGE COLOR
 - BURNT OCHRE EARTH TONE
 - WARM / OFF-WHITES
 - EARTH GREEN / OLIVE
 - WARM CHARCOAL
- METAL RAILINGS ACCENT COLOR RANGE, SUCH AS:
 - SLATE ORANGE / VERMILION
 - SLATE GREEN / SAGE
 - CLEAR ALUMINUM
 - WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A CRAFTSMAN DESIGN CONCEPT OF NEUTRAL BROWN, TAN, BLUE AND RED COLORS. THE PROJECT INCLUDES ONE TWO-STOREY APARTMENT & COMMON BUILDINGS WITH VARIOUS HEIGHTS OF APPROXIMATELY 28 TO 37'.

- THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:
1. DIFFERENTIATED COLOR MATERIALS AND TONE TO ESTABLISH THE BUILDING'S VERTICAL AND HORIZONTAL BODY MARKING.
 2. TREES AND SHRUB LANDSCAPING AROUND THE BUILDING TO PROVIDE PEDESTRIAN SCALE, SHADDED WALKWAYS, SCREENING AND PRIVACY TO THE DWELLING UNITS.
 3. MASS BREAKS AND USE OF VARIOUS SIDING EXPRESSES THE INDIVIDUAL CHARACTER OF DWELLING UNITS. SIDING ELEMENTS REFERENCE THE CRAFTSMAN ELECTRIC STYLE AND SUPPORTED WITH AMERICAN FARMHOUSE DESIGN ACCENTS.
 4. ARTICULATION ENTRANCES, WOOD BAYES CORBELS WINDOW MULLIONS, WALL TRIM, MULTIPLE COLORS, VARIOUS ROOF LINES AND BALCONIES / PATIOS ADD VISUAL INTEREST AND CHARACTER.

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 508 COLUMBIA CT, SUITE 400
 SAN DIEGO, CALIF. 92108
 619 252-2816 FAX 619 252-8842

DAYCARE BLDG. - EXT. ELEV.

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DATE: JUNE 21, 2024

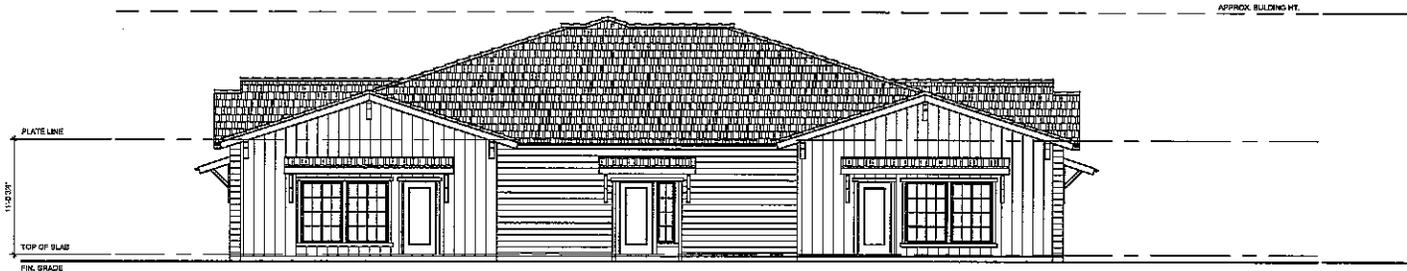
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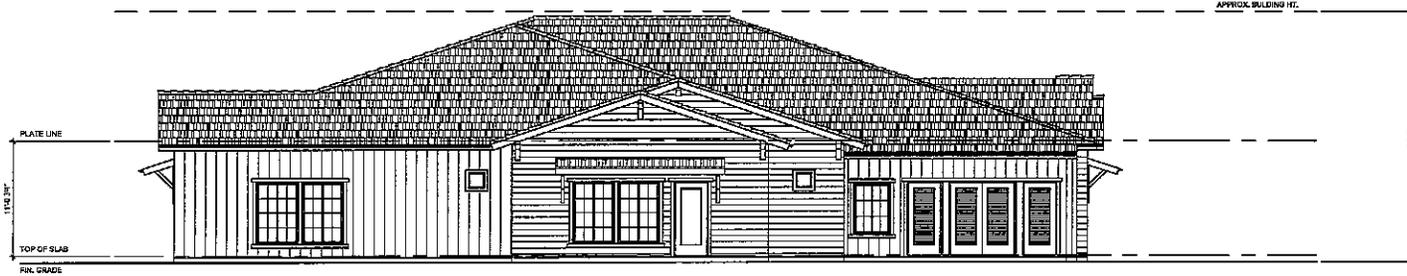
A6.3

ALL LOCAL ORDINANCES, REGULATIONS & STANDARDS SHALL BE OBSERVED AND ENFORCED BY THE APPLICANT. THE APPLICANT SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICANT'S LOCAL JURISDICTION. THE APPLICANT SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICANT'S LOCAL JURISDICTION. THE APPLICANT SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICANT'S LOCAL JURISDICTION.



EXTERIOR ELEVATION 3
DAYCARE BUILDING

SCALE: 3/8" = 1'-0"



EXTERIOR ELEVATION 4
DAYCARE BUILDING

SCALE: 3/8" = 1'-0"

TYPICAL EXTERIOR FINISHES

- CONG. FLAT TILE AT SLOPED ROOFS
ROOF PITCH SHALL BE 12:12
- EXTERIOR STUCCO WALL FINISH
- EXT. CEMENTITIOUS SIDING WALL FINISH
- EXPOSED WOOD CORBELS
- WOOD WINDOW CASINGS
- EXPOSED WOOD METAL TRUSS MEMBERS
- METAL CLAD EXTERIOR DOORS
- METAL CLAD FRENCH DOORS
- VINYL FRAMED WINDOWS
- WOOD WINDOW/DOOR/WALL TRIMS
- METAL BALCONY RAILINGS

EXTERIOR COLORS

- THE EXTERIOR STUCCO COLOR RANGE, SUCH AS:
 - WARM GRAY
 - WARM SIENNA COLOR
 - BURNT OCCHRE EARTH TONE
 - WARM / OFF-WHITES
 - EARTH GREEN / OLIVE
 - WARM CHARCOAL
- METAL RAILINGS ACCENT COLOR RANGE, SUCH AS:
 - SLATE GRAY / VERMILION
 - SLATE GREEN / SAIGE
 - CLEAR ALUMINUM
 - WARM / OFF-WHITES

DESIGN NARRATIVE

ARCHITECTURE CONCEPTUAL ELEVATIONS INCLUDE A MAINTENANCE SELECTIVE DESIGN CONSISTING OF NEUTRAL BROWN, TAN, BLUE AND RED COLORS. THE PROJECT INCLUDES ONE TWO, THREE-STORY APARTMENT & COMMON BUILDINGS WITH VARIOUS HEIGHTS OF APPROXIMATELY 28' TO 37'.

THE CONCEPTUAL ELEVATIONS INCLUDE THE FOLLOWING ARCHITECTURAL DESIGN ELEMENTS:

1. DIFFERENTIATED COLOR MATERIALS AND TON TO DISTRINGUISH THE BUILDING'S VERTICAL AND HORIZONTAL BODY.
2. TREE AND SHRUB LANDSCAPING AROUND THE BUILDING TO PROVIDE PROTECTION SCALE, SHADENED WALKWAYS, SCREENING AND PRIVACY TO THE DWELLING UNITS.
3. MASS BREAKS AND USE OF VARIOUS SIDING EXPRESSES THE INDIVIDUAL CHARACTER OF DWELLING UNITS, SUBORDINATE ELEMENTS REINFORCE THE CRAFTSMAN ELECTRIC STYLE AND SUPPORTED WITH AMERICAN FARMHOUSE DESIGN ACCENTS.
4. ARTICULATION ENTRANCES, WOOD EAVES CORBELS, WINDOW BULLIONS, WALL TRIM, MULTIPLE COLORS, VARIOUS ROOF LINES AND BALCONIES / PATIOS ADD VISUAL INTEREST AND CHARACTER.

CAMINO TERRACE APARTMENTS
JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 330 COLLEMAN CT, SUITE 100
SAN DIEGO, CALIF. 92101 619-525-0911 FAX 619-525-0912

DAYCARE BLDG. - EXT. ELEV.

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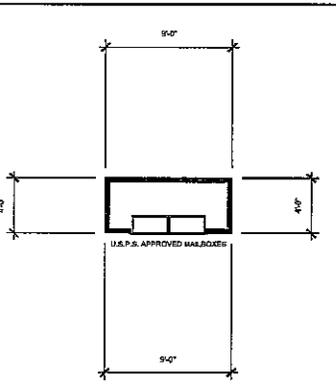
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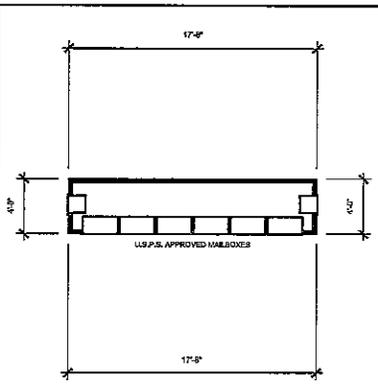
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A6.4

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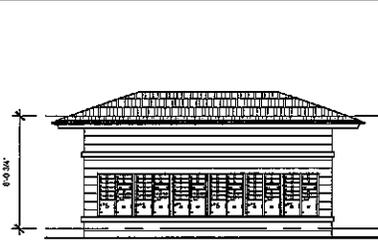
FLOOR PLAN
MAILBOX KIOSK B
SCALE: 1/4" = 1'-0"



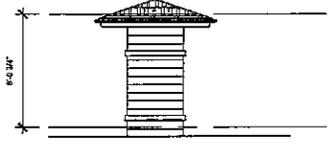
FLOOR PLAN
MAILBOX KIOSK A
SCALE: 1/4" = 1'-0"



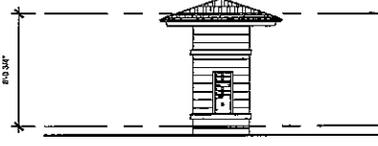
ELEV. 1 - TYP. OF 2



ELEV. 1 - TYP. OF 2



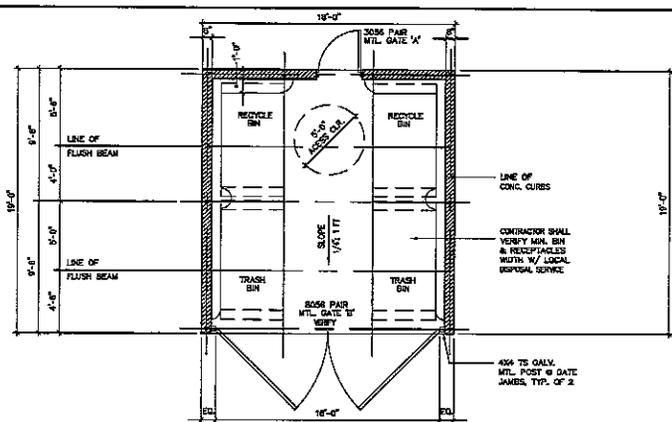
ELEV. 2 - TYP. OF 2



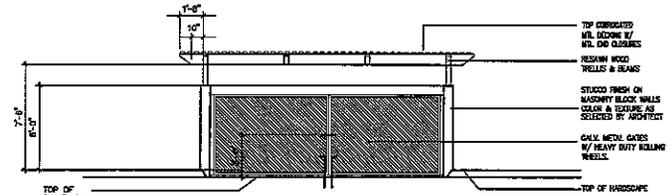
ELEV. 2 - TYP. OF 2

EXT. ELEV.S
MAILBOX KIOSK B
SCALE: 1/4" = 1'-0"

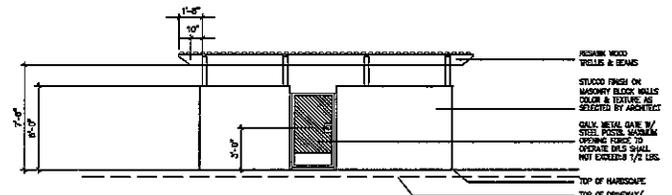
EXT. ELEV.S
MAILBOX KIOSK A
SCALE: 1/4" = 1'-0"



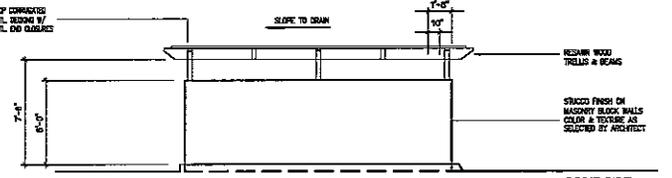
FLOOR PLAN
TRASH-RECYCLE ENCLOSURE
342 SQ. FEET
SCALE: 1/4" = 1'-0"



FRONT ELEVATION



REAR ELEVATION



SIDE ELEVATION
EACH SIDE SIMILAR
DRIVE SIDE

EXTERIOR ELEVATIONS
TRASH-RECYCLE ENCLOSURE
SCALE: 1/4" = 1'-0"

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DATE: JUNE 21, 2024

JOB NO. _____

DESIGNER _____

CHECKED _____

A7.1

ALL SCALE, MEASUREMENTS, DIMENSIONS, AND MATERIALS SHOWN ON THESE PLANS ARE UNLESS OTHERWISE SPECIFIED. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICABLE AGENCIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICABLE AGENCIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICABLE AGENCIES.



CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1230 COLUMBIA ST., SUITE 958
 SAN DIEGO, CALIF. 92101
 (619) 235-2266 PH: (619) 235-5388 FAX

CONCEPTUAL LANDSCAPE PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
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	DATE	AUGUST 24, 2024	LC.1
	JOB NO.		
	DRAWN		
	CHECKED		

A CONCEPTUAL LANDSCAPE PLAN
 1" = 50'-0"

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- LANDSCAPE ELEMENTS KEY: LOT 'B'
- 1 TEG COMPLIANT TOT/LOT WITH 2.5 AND 9' 12 PLAY EQUIPMENT, SHADE, SANIT. SEATING, & SHADE TREES
 - 2 RETAINING WALL - SEE CIVIL PLANS
 - 3 CONCRETE RAMPS & HANDRAILS
 - 4 DECORATIVE SHORT-TERMINAL RAKE
 - 5 42 IN. HIGH OPEN METAL FENCE AT TOP OF SLOPE
 - 6 PEDESTRIAN CROSSING WITH A TERMINAL PAVING FINISH/PATTERN
 - 7 NET BELIEF AREA WITH TURN, BENCH, & WASTE BAG STATION
 - 8 SMOKERS PATIO WITH SEATING & WASTE BIN
 - 9 NOISE BARRIER AREA WITH SEATING
 - 10 SMALL PATIO WITH SEATING, ACCENT TRELLIS, & PAVERS
 - 11 COPPER/REIL STRESS PAD FOR TRASH TRUCK

RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC.
 9245 TWAIN TRAILS DRIVE, PO BOX 722266, SAN DIEGO, CA 92127 PH. (619) 544-8911

form/work
 2785 WILSON PALM LANE
 VAN TRAILS, CA 92118
 T 619 261 8473

f/w
 LANDSCAPE ARCHITECTURE



A CONCEPTUAL LANDSCAPE PLAN: LOT 'B'
 1" = 30' - 0"
 NORTH

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1228 COLUMBIA ST., SUITE 300
 SAN DIEGO, CALIF. 92101 (619) 235-2294 FAX: (619) 235-5363 FAX

CONCEPTUAL LANDSCAPE PLAN
 LOT 'B'

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
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DATE: AUGUST 24, 2024

JOB NO.: _____

DRAWN: _____

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LC.1B

ALL SCALE, DESIGN, MANAGEMENT & PLANS INDICATED OR REPRESENTED BY THIS DRAWING ARE OWNED BY, & THE PROPERTY OF RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC. & ARE CREATED, COPIED & DEVELOPED FOR USE ON, & IN CONNECTION WITH, THE SPECIFIED PROJECT. NONE OF SUCH SCALE, DESIGN, MANAGEMENT OR PLANS SHALL BE USED WITHOUT THE WRITTEN PERMISSION OF RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC. WRITTEN PERMISSION ON THESE DRAWINGS SHALL HAVE PRECEDENCE OVER SCALED DIMENSIONS. CONTRACTOR SHALL VERIFY & BE RESPONSIBLE FOR ALL DIMENSIONS & CONDITIONS ON THE JOB. & THIS OFFICE MUST BE NOTIFIED OF ALL VARIATIONS FROM THE DIMENSIONS & CONDITIONS SHOWN BY THESE DRAWINGS.

LOT 'A' SHADING KEY

-  PARKING: 5,029 SF
-  TREE SHADE: 1,408 (27.0%)

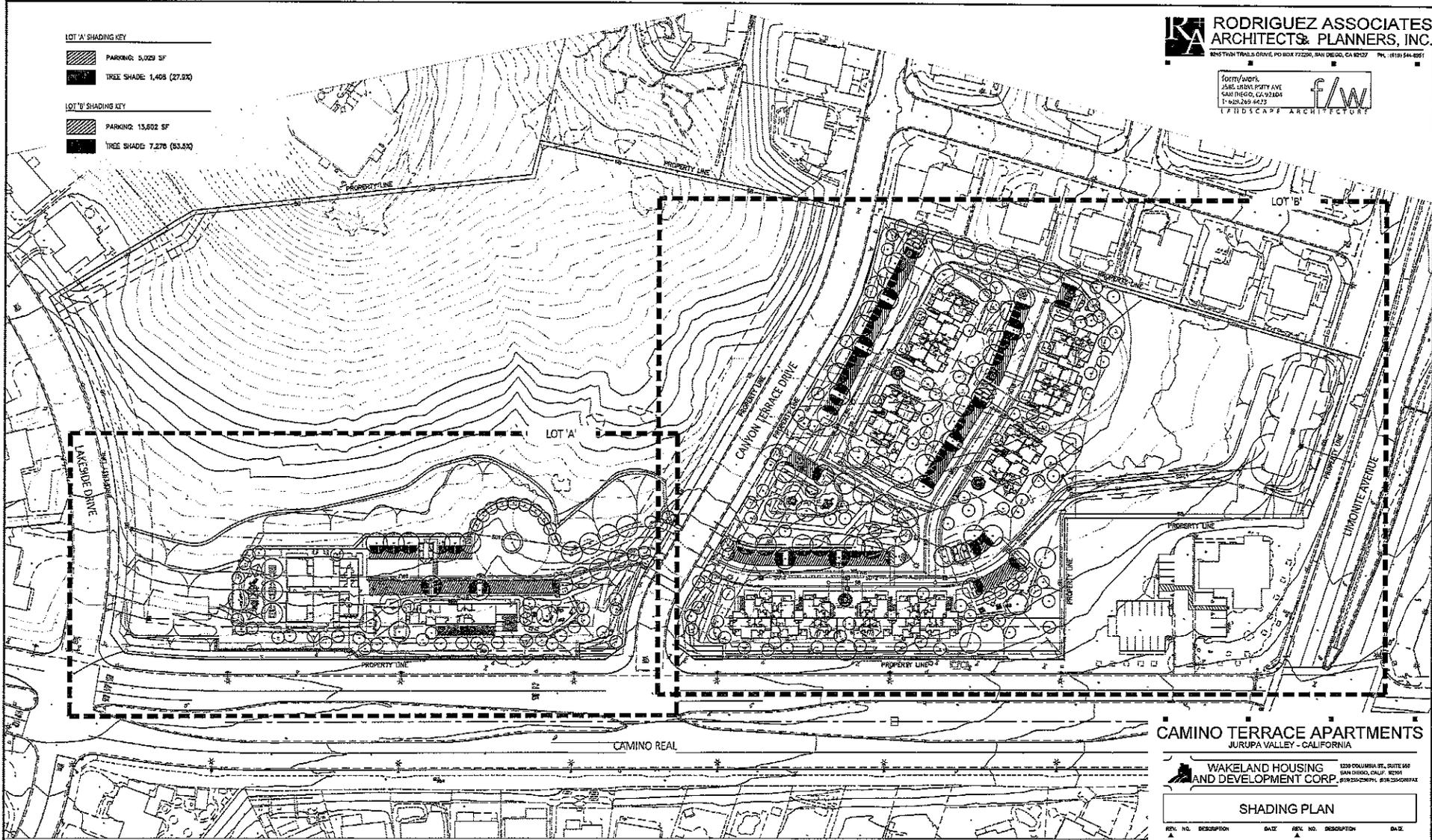
LOT 'B' SHADING KEY

-  PARKING: 13,602 SF
-  TREE SHADE: 7,276 (53.0%)

RODRIGUEZ ASSOCIATES ARCHITECTS & PLANNERS, INC.
 8243 TRIN TRAILS DRIVE, PO BOX 72226, SAN DIEGO, CA 92127 PH: (619) 541-8261

Scotty Gault
 3565 LINDA PIETY AVE
 9441 INGLEWOOD, CA 92364
 T: 626.269.4423

f/w
 LANDSCAPE ARCHITECTURE



CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1320 COLUMBIA ST., SUITE 600
 SAN DIEGO, CALIF. 92108
 (619) 255-2874, (619) 255-0844 FAX

SHADING PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
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DATE: AUGUST 24, 2024
 JOB NO.:
 DRAWN:
 CHECKED:

LC.2

A SHADING PLAN
 1"=50'-0"



ALL SCALE, NOTION, DIMENSIONS & PLANS ARE SUBJECT TO THE DRAWING AND CHANGE SHEETS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR VERIFYING ALL DIMENSIONS AND CONDITIONS ON THE JOB. A 30% OFFICE COPY OF ALL VOLUMES FROM THE CONTRACTOR'S CONTRACT SHALL BE SUBMITTED TO THE ARCHITECT.

SYMBOL	BOTANICAL NAME (COMMON NAME)	MIN. SIZE	WUCOLS
ACCENT TREES (SUCH AS)			
	QUERCUS VIRGINIANA (SOUTHERN LIVE OAK)	36" BOX	MOD
	CERCOBIJA X "DESERT MUSEUM"	36" BOX	LOW
	QUERCUS MOULINIERI (PALE WHITE OAK)	36" BOX	LOW
	GLEHNERIA "SUNBELT JUST" (HONOLULU HONEY LOCUST)	36" BOX	LOW
	TIPUANIA TIPO (TIPO TREE)	36" BOX	LOW
OLEA EUROPAEA "WILSONY" (FRUITLESS OLIVE)	36" BOX	LOW	
SECONDARY ACCENT TREES (SUCH AS)			
	CHALCIPUS LINEARIS (DESERT WILLOW)	15-GAL	LOW
	LAURUS N. "SARATOGA" (SWEET BAY)	15-GAL	LOW
	LAGERHODIA INDICA (YACAL MYRTLE)	15-GAL	LOW
	ROBINIA X AMBIGUA "PUMP-KORF" (COCOA TREE)	15-GAL	LOW
	CASSIA LEPTOPHYLLA (GOLD MEDALLION TREE)	15-GAL	MOD
FRAXUS CALIFORNIANA (SCALLERY PLAR)	15-GAL	MOD	
PARKING AREA TREES (SUCH AS)			
	PROSOPIS CHRISPEUS (CHILEAN MESQUITE)	36" BOX	LOW
	QUERUS PARVIFLORA (ASH-HAZEL WILLOW)	36" BOX	MOD
	CHITRALPA X "SARATOGA" (CHITRALPA TREE)	48" BOX	LOW
	RHUS LANCEA (ARIZONA SUNAC)	36" BOX	LOW
	ULMUS PARVIFLORA "DRAK" (DRAKE EVERGREEN FERN)	36" BOX	LOW
ACCENT PALMS (SUCH AS)			
	SYAGRUS ROMANZOFFIANUM (QUEEN PALM)	10" BTH	LOW
	TRACHYCARPUS FORTUNEI (MIDWINTER PALM)	10" BTH	LOW
	CHAMAEROPY FIMBILIS (VALLEY TIRANIAN PALM PALM)	10" BTH	LOW
SHRUBS/SUCCULENTS/GROUNDCOVERS/VINES (SUCH AS)			
WOODY SHRUBS & SCREENING (SUCH AS)			
	ARBUFUSUS "LUSH KING" (DWARF ARBUFUS)	5-GAL	LOW
	GREVILLEA TIBELLII (WHEEL'S GREVILLEA)	5-GAL	LOW
	MYRTUS COMBENSIS "COMPACT" (DWARF MYRTLE)	5-GAL	MOD
	WESTRINGIA FRUTICOSA CV (COAST ROSEMARY)	5-GAL	LOW
	CALLISTEMON V. "BETTER JOHN" (BETTER JOHN BOTTLEBRUSH)	1-GAL	LOW
	RHAMNUS CALIFORNICUS (COFFEE BERRY)	1-GAL	LOW
	SMALL SHRUBS/SUCCULENTS/PLEEWALS (SUCH AS)		
	ADONIS SPP. (ADONIS)	1-GAL	LOW
	ADONIS SPP. (ADONIS)	1-GAL	LOW
	HESPERALOE PARVIFLORA (RED YUCCA)	1-GAL	LOW
	SUHLINEROSA DUBIA (PINK SUHLYE)	1-GAL	LOW
	SANTOLINA CHAMAELYPAREUSIS (LAVENDER CUTTING)	1-GAL	LOW
	GROUNDCOVERS (SUCH AS)		
	SENECIO SERPENS (BLUE CHALK STICKS)	1-GAL	LOW
	LANTANA SPP. (LANTANA)	1-GAL	LOW
STORMWATER PLANTS (SUCH AS)			
	PUNILUS PATENS (CALIFORNIA GRAY FLUSH)	1-GAL	LOW
	MUHLENBERGIA RIGENS (DEERGRASS)	1-GAL	MOD
	CHONDROPETALUM TECTORIUM (SMALL CARP. RUSH)	1-GAL	LOW
	CAREX SPP. (SEDGE)	1-GAL	MOD
	BOULEDOVA "GRACIOS (BLUE GRAMA)	1-GAL	LOW
HELIOPSIS ARBORESCENS (LOYSIDE)	1-GAL	LOW	
SLOPE PLANTING (SUCH AS)			
	MYOPORIUM SPP. (CREEPING MYOPORIUM)	1-GAL	LOW
	BACCHARIS "CENTENNIAL" (CENTENNIAL DESERT SHRUB)	1-GAL	LOW
	ACACIA NEOSOLANS "RESISTANT CARPET" (PROSOPIS ACACIA)	1-GAL	LOW
	ARCTOSTAPHYLOS "PACIFIC MIST" (PACIFIC MIST MANZANITA)	1-GAL	LOW
	ARCTOSTAPHYLOS "TERRACE CARPET" (TERRACE CARPET MANZANITA)	1-GAL	LOW
	LEMNOIDES BIRNEYI (BIRNEYI GOLF COURSE)	1-GAL	LOW



A CANDIDATE PLANT IMAGERY



B PLAY EQUIPMENT



C DESIGN IMAGERY

D CANDIDATE PLANT LEGEND

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP. 1230 COLUMBIA ST., SUITE 100
 SAN DIEGO, CALIF. 92101 (619) 233-2284 PH: (619) 233-6388 FAX

SUPPLEMENTAL LANDSCAPE EXHIBITS

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
▲			▲		
▲			▲		
▲			▲		

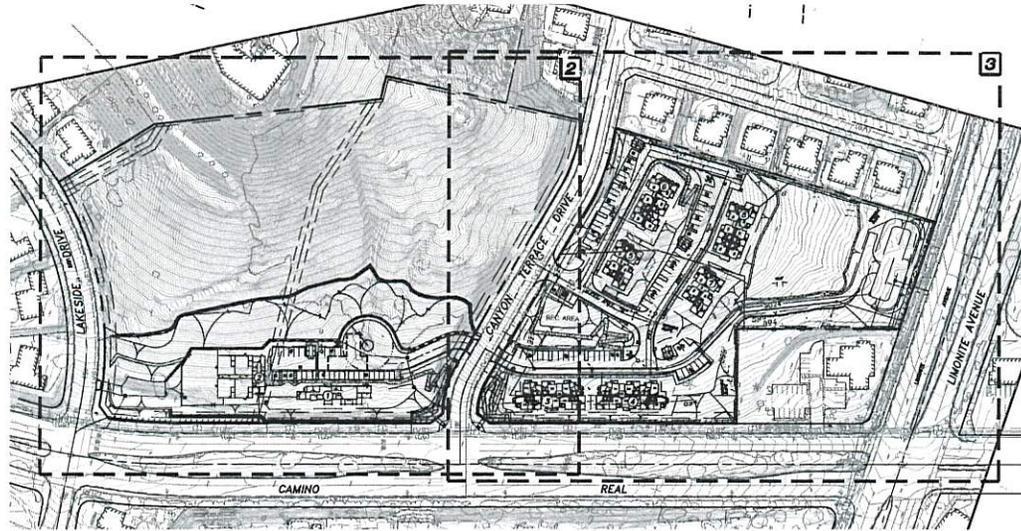
DATE: AUGUST 24, 2024
 JOB NO.:
 DRAWN:
 CHECKED:

LC.3

ALL PLANTING, EQUIPMENT, & PLAY EQUIPMENT IS TO BE INSTALLED BY THE CONTRACTOR. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES.

LEGEND

- PROJECT BOUNDARY
- STREET CENTERLINE
- LOT LINE
- SIDEWALK
- DIRECTION OF DRAINAGE
- SLOPE (2:1 MAX., U.O.N.)
- EASEMENT LINE
- NEW PATH OF TRAVEL
- RETAINING WALL
- MSCE RETAINING WALL
- PROPOSED FENCE
- ACCESS RIGHTS WAIVED
- TRASH ENCLOSURE
- PRIVATE STORM DRAIN (SIZE PER PLAN)
- TYPE "A"-4" CLEANOUT
- TYPE "B"-1" CURB INLET
- BUILDING NUMBER
- SUBGRADE ELEVATION
- FINISHED FLOOR ELEVATION
- PRIVATE SEWER MAIN
- PRIVATE 4" SEWER LATERAL
- PRIVATE SEWER MANHOLE
- PRIVATE 4" FIRE SERVICE
- PRIVATE FIRE MAIN
- PRIVATE FIRE RPDA
- PRIVATE WATER MAIN
- PRIVATE DOMESTIC WATER SERVICE
- PRIVATE 4" METER AND RPDA
- PRIVATE 2" RECLAIMED WATER SERVICE
- PRIVATE FIRE HYDRANT
- STREET LIGHT
- EXISTING STORM DRAIN PIPE
- EXISTING TYPE "A"-4" CLEANOUT
- EXISTING TYPE "B"-1" CURB INLET
- EXISTING CONTOUR
- EXISTING CURB AND GUTTER
- EXISTING STRIPING
- EXISTING GAS
- EXISTING ELECTRIC
- EXISTING SEWER MAIN
- EXISTING WATER MAIN
- EXISTING RECLAIMED WATER MAIN
- EXISTING FIRE HYDRANT
- EXISTING FENCE
- EXISTING STREET LIGHT



KEY MAP
SCALE: 1" = 100'



INDEX

EARTHWORK QUANTITIES
SOUTH

	CUT (CY)	FILL (CY)
*RAW	33,000	33,780
STREETS AND PARKING	12,796	0
BASIN	67	0
SIDEWALK	0	0
BLDG FOUNDATION	3,000	0
R & R (10%)	-	3,386
TOTAL	33,863	37,116
NET EXPORT	6,247	
R & R	-	33,863

RAW NUMBERS SHOW ROUGH GRADE TO SUBGRADE

NORTH

	CUT (CY)	FILL (CY)
*RAW	17,689	2,850
STREETS AND PARKING	3,259	0
BASIN	24	0
SIDEWALK	0	0
BLDG FOUNDATION	1,000	0
R & R (10%)	-	2,128
TOTAL	21,283	4,978
NET EXPORT	16,305	
R & R	-	21,283

** RAW NUMBERS SHOW ROUGH GRADE TO SUBGRADE

GENERAL NOTES

1. GROSS AREA: 15.53 ACRES
- NET AREA: 15.53 ACRES
2. EXISTING ZONING: R3
3. PROPOSED ZONING: R3
4. GENERAL PLAN: MEDIUM HIGH DENSITY RESIDENTIAL
5. AERIAL TOPO SOURCE: TOPOGRAPHIC INFORMATION SHOWN HEREON IS BY PHOTOGRAMMETRIC METHODS. PHOTOGRAMMETRY PROVIDED BY AEROTECH MAPPING, INC. PROJECT NO. C43521-040. THE TOPOGRAPHY WAS COMPILED FROM AERIAL PHOTOGRAPHY DATED APRIL 4, 2021.
6. SPECIFIC PLAN: MISSION DE ANZA #123
7. EXISTING USE: VACANT AND STREET IMPROVEMENTS
8. PROPOSED USE: RESIDENTIAL MIXED-USE - AFFORDABLE HOUSING COMMUNITY BUILDING AND DAYCARE FACILITY
9. PARKING SPACES:
NORTH: 31
SOUTH: 74

BENCHMARK

AT THE "T" INTERSECTION OF LIMONITE AVENUE AND CLAY STREET 120.50' EAST OF A CORNERED "X" ON THE TOP OF A 3" X 4" CONCRETE DROP INLET 30' SOUTH OF THE WEST BOUND LANES, AL-1/2" IRON PIPE AND COUNTY SURVEYOR TAG IN A CAP WELL MONUMENT.

ELEV: 793.801 DATUM: NGVD 29

APPLICANT

WAKELAND HOUSING & DEVELOPMENT
1230 COLUMBIA ST., #500
SAN DIEGO, CA 92101
(619) 235-2298

OWNER

HOUSING AUTHORITY OF THE COUNTY OF RIVERSIDE
P.O. BOX 1180
RIVERSIDE, CA 92502
(951) 343-5481

CIVIL ENGINEER

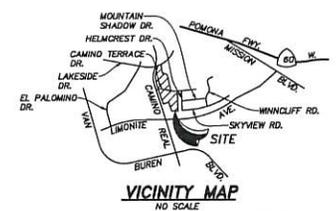
SB&O INC.
3590 RUFFIN ROAD, SUITE 120
SAN DIEGO, CALIFORNIA 92123
(658) 560-1141

LEGAL DESCRIPTION

ALL THAT CERTAIN REAL PROPERTY SITUATED IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS: LOTS 1, 2 AND 3 OF TRACT NO. 20626, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA AS SHOWN BY MAP ON FILE IN BOOK 216, PAGES 14 THROUGH 17, INCLUSIVE OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

ASSESSORS PARCEL NUMBER

185-460-001, 185-470-001, 185-470-002



CAMINO TERRACE APARTMENTS

PRELIMINARY FOR REVIEW ONLY

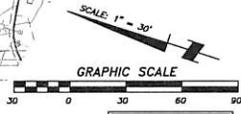
SB&O INC.
PLANNING ENGINEERING SURVEYING
3590 Ruffin Road, Suite 120
San Diego, Ca. 92123
658-560-1141 658-560-8157
Fax

EASEMENT NOTE

- (B) INDICATES AN EXISTING EASEMENT FOR ROAD AND DRAINAGE PURPOSES GRANTED TO THE COUNTY OF RIVERSIDE PER DOCUMENT RECORDED APRIL 15, 1963 AND DOC. NO. 7389, O.R.
- (C) INDICATES AN EXISTING EASEMENT FOR PIPELINE AND INCIDENTAL PURPOSES GRANTED TO JURUPA COMMUNITY SERVICES DISTRICT OF RIVERSIDE COUNTY PER DOCUMENT RECORDED MARCH 9, 1990 AND DOC. NO. 86370, O.R.



**EXISTING EASEMENTS FOR:
CAMINO TERRACE
APARTMENTS**



**PRELIMINARY
FOR REVIEW ONLY**

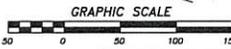
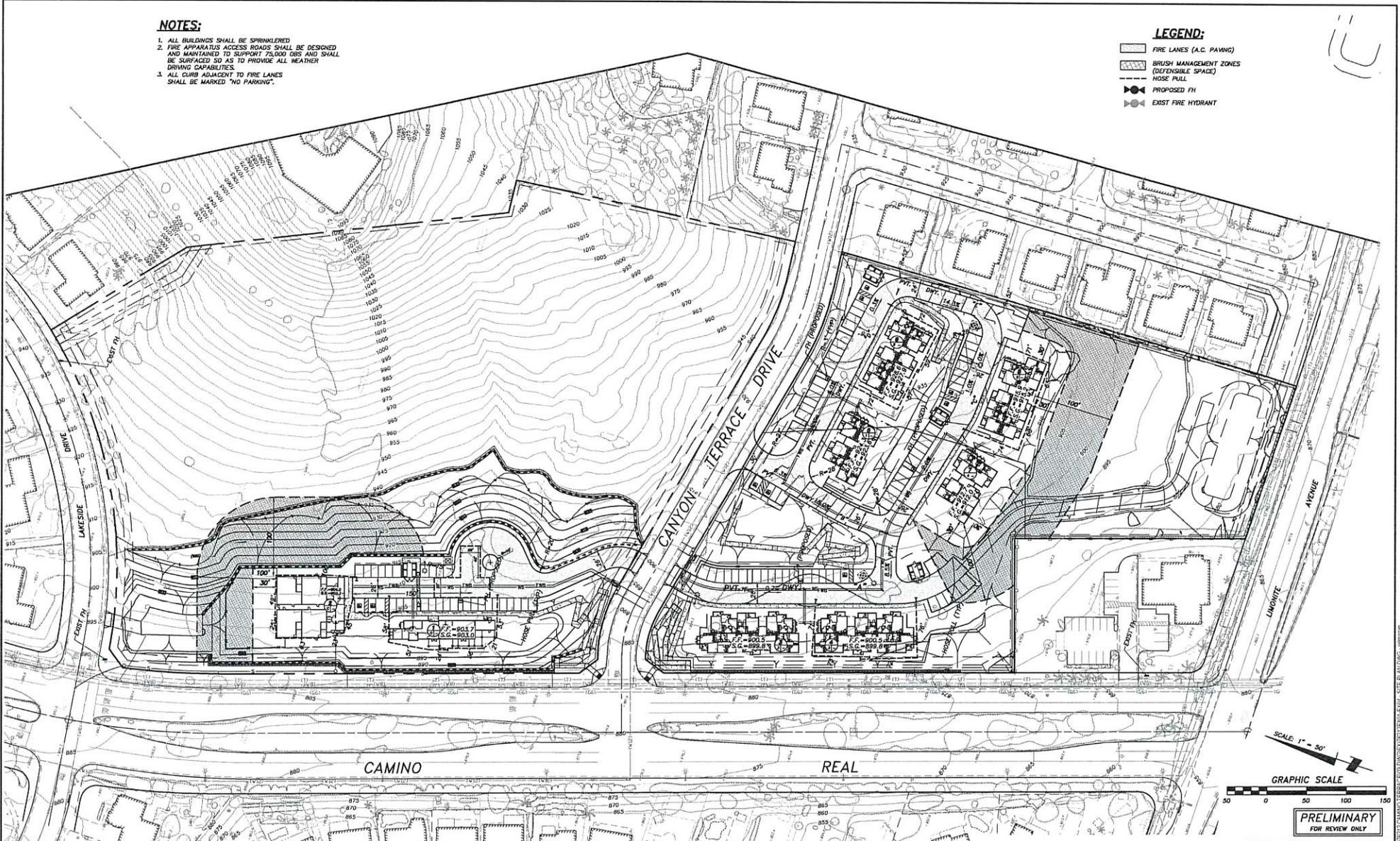
SB&O INC.
PLANNING ENGINEERING SURVEYING
3990 Ruffin Road, Suite 120
San Diego, Ca. 92123
858-560-1141 858-560-8157
Fax

NOTES:

1. ALL BUILDINGS SHALL BE SPRINKLERED
2. FIRE APPARATUS ACCESS ROADS SHALL BE DESIGNED AND MAINTAINED TO SUPPORT 75,000 LBS AND SHALL BE SURFACED SO AS TO PROVIDE ALL HEAVY DRIVING CAPABILITIES.
3. ALL CURB ADJACENT TO FIRE LANES SHALL BE MARKED "NO PARKING".

LEGEND:

-  FIRE LANES (A.C. PAVING)
-  BRUSH MANAGEMENT ZONES (DEFENSIBLE SPACE)
-  HOSE PULL
-  PROPOSED FH
-  EXIST FIRE HYDRANT



PRELIMINARY FOR REVIEW ONLY

FIRE ACCESS PLAN FOR:
CAMINO TERRACE
APARTMENTS

SB&O INC.
PLANNING ENGINEERING SURVEYING
3990 Ruffin Road, Suite 120
San Diego, Ca 92123
858-560-1141 858-560-8157
Fax

FIGURE B-02024.8-20 AND D-0212 CAMINO TERRACE (DWG) (REV) (E) (M) - SITE PLAN (DWG) - JPH/MS

ATTACHMENT NO. 3

Appeal of Director's Action to Planning Commission

City of Jurupa Valley

Planning Department

8930 Limonite Avenue
Jurupa Valley, CA 92509
P: (951) 332-6464
F: (951) 332-6995
http://www.jurupavalley.org



APPEALING THE DECISION OF THE PLANING AGENCY:

<input type="checkbox"/> Site Development Permit	<input type="checkbox"/> Tentative Tract Map	FOR CITY USE ONLY Date Received: _____ Received By: _____ Hearing Date: _____ Case No(s): _____
<input type="checkbox"/> Variance	<input type="checkbox"/> Revision to Approved Plan	
<input type="checkbox"/> Conditional Use Permit	<input type="checkbox"/> Tentative Parcel Map	
<input type="checkbox"/> Design Review	<input type="checkbox"/> Time Extension	
<input type="checkbox"/> Initial Plan Review	<input type="checkbox"/> Zoning Clearance	
<input type="checkbox"/> Modification	<input type="checkbox"/> Substantial Conformance	
<input type="checkbox"/> Other action: _____		

no address - APNs: 185470001,
Project Address: 185470002, 185460001 **Assessor's Parcel Number:** _____-_____-_____
 Zoning: R-3 Lot Size: 676,486 SF
 General Plan Designation: MHDR Present Use of Property/Existing Improvements: vacant

Appellant's Name: Wakeland Housing and Development Corporation
 Address: 1230 Columbia Street, Ste. 950 TelephoneNumber: 619.235.2296 Fax Number: _____
 City: San Diego ZipCode: 92101 Email: _____
Contact Person: Jamie Poster, Craig Lawson & Co., LLC (land use representative)
 Address: 3221 Hutchison Avenue, Suite D TelephoneNumber: 310-838-2400 Fax Number: _____
 City: Los Angeles ZipCode: 90034 Email: jamie@craiglawson.com
Property Owner's Name: Housing Authority of the County of Riverside
 Address: 5555 Arlington Avenue TelephoneNumber: 951-351-0700 Fax Number: _____
 City: Riverside ZipCode: 92504 Email: _____

Explanation of the Appeal (What decision or part of a decision do you disagree with and why should the decision be overturned): See Attachment "A"

City of Jurupa Valley

Planning Department
8930 Limonite Avenue
Jurupa Valley, CA 92509
P: (951) 332-6464
F: (951) 332-6995
<http://www.jurupavalley.org>



Owner's Affidavit

STATE OF CALIFORNIA) SS:
COUNTY OF RIVERSIDE)

I/WE JUAN GARCIA BEING DULY SWORN, DEPOSE AND SAY, THAT I/WE AM/ARE THE OWNER (S) OF THE PROPERTY INVOLVED IN THIS PETITION, AND THAT THE FOREGOING STATEMENTS AND ANSWERS HEREIN CONTAINED AND THE INFORMATION HEREWITH SUBMITTED, ARE IN ALL RESPECTS TRUE AND CORRECT TO THE BEST OF KNOWLEDGE AND BELIEF.

SIGNATURE: J Garcia
ADDRESS: 5555 ARLINGTON AVENUE
CITY: RIVERSIDE
TELEPHONE: 951-955-8126

SIGNATURE: _____
ADDRESS: _____
CITY: _____
TELEPHONE: _____

NOTE: This application must be signed by the same persons, and in the same manner as that in which title is held. Before signing, please examine your deed or title insurance policy.

[Signature] _____
Appellant's Signature Date

Office Use

Date: _____ Received By: _____ File Number: _____

* The Application form being signed under penalty of perjury does not require notarization.

**ATTACHMENT “A”
MA24164
EXPLANATION OF THE APPEAL**

Executive Summary

In response to the Notice of Decision issued February 13, 2025, Wakeland Housing and Development Corporation (the “Applicant”) is appealing this decision in accordance with Jurupa Valley Municipal Code (“JVMC”) Section 9.05.105. The Community Development Director erred in its decision for the following reasons:

- The City did NOT use Objective standards, as required by the State’s Housing Accountability Act, to justify its statement that the Project is not a Supportive Housing Project.
- The Project should be processed by-right regardless of whether the Project is a Supportive Housing Project based on the following provisions in the City’s Housing Element:
 - Multi-Family Ministerial Review. The City’s Housing Element purports that all multi-family housing with 10% restricted affordable is processed via a Ministerial Site Development Permit (Housing Element, Page 5-85), but the City’s Zoning Code is not consistent with this statement.
 - R-3 Zone Multi-Family By Right. The City’s Housing Element purports that all multi-family housing in the R-3 Zone is allowed by right (Housing Element, Page 5-88), but the City’s Zoning Code requires Site Development Permits for all development in the R-3 Zone.
- The City did NOT make the required findings pursuant to:
 - The Housing Accountability Act (Gov. Code Section 65589.5(d)) and
 - State Density Bonus Law (Gov. Code Section 65915(d) and (e)).

The City did NOT use Objective Standards to make its decision, as required by the Housing Accountability Act

The City has determined the Project is not eligible to be processed as a Supportive Housing Project. The eligibility requirement in question is written in Gov. Code Section 65651(a)(5):

Nonresidential floor area shall be used for onsite supportive services and administrative office space in the following amounts:

(B) For a development with more than 20 units, at least 3 percent of the total floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.

(C) The total floor area dedicated to administrative office space shall not exceed 25 percent of the total floor area.

The Project includes a 2,718 SF Community Building, which comprises 3.57% of the Project's total proposed floor area (75,922 SF), and which includes administrative office space, a computer room, a community kitchen and laundry facilities.

The City has interpreted that this building does not meet the definition of "onsite" for the following reasons identified in the February 13, 2025 Notice of Decision and included in Figure 1 on the following page:

- The supportive services are located on a separate legal parcel from the housing units.
- There is a 300-foot separation between the nearest proposed housing unit and the building offering services.
- Residents of the housing units would need to cross a public street to access the Community Building.
- The supportive housing is intended to service a target population that includes homeless veterans, who may have physical disabilities and would require the use of wheelchairs or other mobility devices.
- Those that use wheelchairs and mobility devices would have difficulty accessing the other site since there are no off-site improvements such as sidewalks that provide accessible and continuous paths between and around the two sites.

Figure 1. Screenshot of the Notice of Decision Findings

DENIAL FINDINGS

The City of Jurupa Valley finds that the proposed project does not meet the requirements for ministerial approval of supportive housing under Government Code Section 65651(a)(5) which requires that: "Nonresidential floor area shall be used for **onsite supportive services** and administrative office space in the following amounts: (B) For a development with more than 20 units, at least 3 percent of the total floor area shall be provided for **onsite supportive services** that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens." The proposed project does not provide any "onsite" supportive services. Instead, the proposed project includes supportive services on a separate parcel that is located across the street from the 80 housing units.

The proposed project fails to provide adequate connectivity between the two parcels such that those residing in the housing units could have access to the services located on the other parcel. There is a 300-foot separation between the nearest proposed housing unit and the building offering services. Residents of the housing units would need to traverse Canyon Terrace Drive to access the services located across the street. The supportive housing is intended to service a target population that includes homeless veterans, who may have physical disabilities and would require the use of wheelchairs or other mobility devices. Those that use wheelchairs and mobility devices would have difficulty accessing the other site since there are no off-site improvements such as sidewalks that provide accessible and continuous paths between and around the two sites. Access is a particularly important feature since the site has steep terrain along Canyon Terrace Drive.

To qualify as supportive housing, the services must be provided **onsite**. Here, the applicant is proposing to provide the supportive services on a separate parcel, and is not providing any right of way improvements necessary for the target population, which includes homeless veterans, to be able to access the parcel where the supportive services will be offered. As proposed, the project does not meet the definition of a supportive housing project under Government Code section 65651.

State Law does not objectively exclude large sites or sites with more than one parcel from being eligible from supportive housing. State Law does not specify an objective distance within which the supportive services must be provided, although the Notice of Decision has cited 300 feet. State Law does not differentiate between project sites on contiguous lots and project sites on adjacent lots, although the Notice of Decision states the public street that divides the site would disqualify the project. State Law does not change its approach to the location of supportive services if the target population has a physical disability, although the Notice of Decision implies that supportive housing projects with physically disabled residence have different requirements than other supportive housing projects. Lastly, State Law does not reflect on whether there are existing sidewalks surrounding the project, but the Notice of Decision concludes that the proposed pedestrian improvements designed to connect the proposed accessible path-of-travel across the public street, as shown on the civil plans submitted with the application, are not sufficient.

Reasonable Person Standard

In accordance with the Housing Accountability Act (Gov. Code Section 65915(f)(4)), a housing development project shall be deemed consistent with Objective Standards if substantial evidence exists allowing a reasonable person to conclude that the housing development project is consistent.

The Housing Accountability Act, Gov. Code Section 65589.5(f)(9), defines “Objective, quantifiable, written development standards, conditions, and policies,” as follows:

For purposes of this subdivision, “objective, quantifiable, written development standards, conditions, and policies” means criteria that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official before submittal, including, but not limited to, any standard, ordinance, or policy... In the event that applicable objective, quantifiable, written development standards, conditions, and policies are mutually inconsistent, a development shall be deemed consistent with the criteria that permits the density and unit type closest to that of the proposed project.

Onsite Definition

Gov. Code Section 65651(a) does not define “onsite.” Absent an official definition in State Law, one could find definitions of “onsite” elsewhere, such as a dictionary, or find related definitions in the local Zoning Code or State Law. Some definitions of site, Building Site, Project and on-site are provided in Table 1 below.

Table 1. Definitions of Site, Building Site, On-Site and Off-Site

Word	Source	Definition	Example Sentences
Site	Oxford English Dictionary ¹	An area of land occupied by a building, town, etc..., or which is set apart for some purpose.	N/A

¹ Oxford English Dictionary: <https://www.oed.com/search/dictionary/?scope=Entries&q=site>

Word	Source	Definition	Example Sentences
Site	Merriam Webster ²	a: the spatial location of an actual or planned structure or set of structures (such as a building, <i>town</i> , or <i>monuments</i>) b: a space of ground occupied or to be occupied by a building	N/A
	Dictionary.com ³	1. The position or location of a <i>town</i> , building, etc., especially as to its environment. 2. The area or exact plot of ground on which anything is, has been, or is to be located.	<i>the site of our summer cabin,</i> <i>the site of ancient Troy.</i>
Building Site	JVMC Section 9.10.190	The ground area of a building or <i>buildings</i> together with all open spaces adjacent thereto, as required by this chapter.	N/A
Project	CEQA Guidelines Section 15378	The term “project” refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term “project” does not mean each separate governmental approval.	
On-Site	Merriam Webster ⁴	At a particular place especially of business.	printed <i>on-site</i> <i>on-site</i> day care <i>on-site</i> inspections <i>on-site</i> parking
	Dictionary.com ⁵	Adj. Accomplished or located at the site of a particular activity or happening. Adv. on or at a particular site.	<i>Faculty, staff, and graduate students have two options for on-site childcare.</i> <i>They treated the wounded on-site before putting them on a helicopter for evacuation.</i>
	Oxford English Dictionary ⁶	Situated or occurring on a particular site.	

² Merriam-Webster: <https://www.merriam-webster.com/dictionary/site>

³ Dictionary.com: <https://www.dictionary.com/browse/site>

⁴ Merriam-Webster: <https://www.merriam-webster.com/dictionary/on-site>. Accessed 21 Feb. 2025.

⁵ Dictionary.com: <https://www.dictionary.com/browse/on-site>

⁶ Oxford English Dictionary: <https://www.oed.com/search/dictionary/?scope=Entries&q=on-site>

In land use, it is common to refer to a site as a “Project Site,” which does not have an official definition, but is commonly considered to be the site of the Project or site of the activity which is being approved. The proposed supportive housing project, which includes housing, supportive services and childcare center, is proposed across a large, irregularly shaped, 15.56-acre site with a nearly 200-foot grade change that is divided by a public street (the “Project Site”). A reasonable person would not conclude the location of the proposed community building is not within the Project Site based on the available definitions of site, Building Site, Project and on-site.

In conclusion, although State Law does not define “onsite,” the City has crafted a subjective definition of “onsite” that a reasonable person is unlikely to conclude on their own. Provided that the proposed supportive services are within the same Project Site as the proposed housing, both of which are proposed within a development unified by common ownership, architectural design, landscape program and accessible path of travel (despite contradictory statements in the Notice of Decision), the proposed supportive services objectively satisfy the onsite supportive service requirement and should not provide grounds for denying the project as a “use by right.”

The Project should be processed by-right for reasons stated in the City’s Housing Element

The City’s Housing Element states the following:

Figure 2. Housing Element Page 5-88

Land Use Controls Analysis

The City of Jurupa Valley’s development approval process is designed to accommodate, not hinder, residential development. For example, developments of single-family homes and manufactured homes on existing, individual lots in any residential zones that meet development standards (setbacks, lot size and coverage, building height, parking) do not require discretionary approval. They require only a building permit – a ministerial process – to allow construction. Similarly, multi-family housing is allowed “by right” in the R-3 Zone (General Residential). In all residential zones that do not allow multi-family by right would require a Site Development Permit (SDP). As

If the above statement in the City’s Housing Element were true, the Project would only need to be reviewed in accordance with State Density Bonus Law. However, all uses in the R-3 Zone require a Site Development Permit as required by JVMC Section 9.80.020(A).

The City's Housing Element also states the following:

Figure 3. Housing Element Page 5-85

Ministerial Site Development Permits (SDPs)

In 2020, the City adopted objective multifamily residential development standards (MMC 92.40.545) to facilitate the ministerial review of multifamily housing projects that reserve a minimum of 10% of the units affordable to lower income households. As of the

If the above statement in the City's Housing Element were true, the Project would be eligible for ministerial review because it is proposing 100% of the total units to lower income households, excluding one manager's unit. However, the City's multi-family residential development standards do not allow for ministerial review and instead include a slew of subjective standards, such as the requirement for a project's architectural style to be "Spanish Colonial, Craftsman, Victorian, California Bungalow, American Farmhouse, or California Ranch" (JVMC Section 9.240.545(B)(11)(d), or the requirement that all multi-family housing developers prepare a traffic impact assessment, a cultural resources report and a Phase 1 assessment and then incorporate the mitigations identified in those reports (JVMC Section 9.240.545(B)(12)).

Notice of Decision does NOT make the required findings

Findings Required by the Housing Accountability Act

The Housing Accountability Act, Gov Code Section 65589.5(d), prohibits a local agency from denying an affordable housing development project, such as the project proposed by the Applicant, unless it makes written findings based upon a preponderance of the evidence in the record (i.e. evidence that has a more convincing force than that opposed to it), as to one of the following:

(1) Has the City already exceeded its Regional Housing Needs Allocation ("RHNA") requirements?

Gov Code Section 65589.5(d)(1) The jurisdiction has adopted a housing element pursuant to this article that has been revised in accordance with Section 65588, is in substantial compliance with this article, and the jurisdiction has met or exceeded its share of the regional housing need allocation pursuant to Section 65584 for the planning period for the income category proposed for the housing development project, provided that any disapproval or conditional approval shall not be based on any of the reasons prohibited by Section 65008. If the housing development project includes a mix of income categories, and the jurisdiction has not met or exceeded its share of the regional housing need for one or more of those categories, then this paragraph shall not be used to disapprove or conditionally approve the housing development project. The share of the regional housing need met by the jurisdiction shall be calculated consistently with the forms and definitions that may be adopted by the Department of Housing and Community Development pursuant to Section 65400. In the case of an emergency shelter, the jurisdiction shall have met or exceeded the need for emergency shelter, as identified pursuant to paragraph (7)

of subdivision (a) of Section 65583. Any disapproval or conditional approval pursuant to this paragraph shall be in accordance with applicable law, rule, or standards.

Not only does the Notice of Decision not mention the City’s Housing Element or regional housing need allocation, but the City is neither in compliance with its own Housing Element goals, objectives and policies nor has it met its RHNA numbers, outlined in Figure 4 below.

Figure 4. Table 5.34 of the City’s Housing Element – 6th Cycle RHNA Allocation Summary

Income Category (% of County AMI)	Number of Units	Percent
Very Low (0 to 50%)	1,207*	26.8%
Low (51 to 80%)	749	16.7%
Moderate (81% to 120%)	731	16.3%
Above Moderate (Over 120%)	1,810	40.2%
Total:	4,497	100%

Source: SCAG 6th Cycle Final RHNA Allocation Plan, March 2021
 AMI = Area Median Income
 *The City has a RHNA allocation of 1,207 very low income units (inclusive of extremely low income units). This allocation is evenly split between extremely low and very low income groups pursuant to state law (AB 2634)

(2) Does the Project have an unmitigable Specific Adverse Impact Upon the Public Health or Safety (as defined)?

Gov Code Section 65589.5(d)(2): *The housing development project or emergency shelter as proposed 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 without rendering the development unaffordable to low- and moderate-income households or rendering the development of the emergency shelter financially infeasible. As used in this paragraph, a “specific, adverse impact” means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. The following shall not constitute a specific, adverse impact upon the public health or safety:*

- (A) *Inconsistency with the zoning ordinance or general plan land use designation.*
- (B) *The eligibility to claim a welfare exemption under subdivision (g) of Section 214 of the Revenue and Taxation Code.*

As written in “findings” within the Notice of Decision, the “findings identify the project’s failure to comply with the Jurupa Valley General Plan policies, which results in specific, adverse impacts upon the public health and safety...” and then proceeds to identify several provisions within the Zoning Code from which the Applicant could either easily mitigate (ie, the landscape architect can remove a proposed tree within 10 feet of a driveway) or that the Applicant has requested incentives or waivers for relief in accordance with SDBL.

However, requests for incentives and waivers pursuant to SDBL are prohibited from being reasons a project is not consistent with a Zoning Ordinance. The Housing Accountability Act states:

Gov Code Section 65589.5(j)(3): For purposes of this section, the receipt of a density bonus, incentive, concession, waiver, or reduction of development standards pursuant to Section 65915 shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity, with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision specified in this subdivision.

Additionally, the Housing Accountability Act explicitly prohibits using inconsistencies with a zoning ordinance as a Specific, Adverse Impact and subsequent memos issued by the State's Department of Housing and Community Development ("HCD") have clarified that potential impacts to community character do not create a Specific, Adverse Impact (see Figure 5 below).

Figure 5. Excerpt from HCD's Housing Accountability Act Technical Assistance Advisory⁷

A "**specific, adverse impact**" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. Pursuant to Government Code section 65589.5 (a)(3) it is the intent of the Legislature that the conditions that would have a specific, adverse impact upon the public health and safety arise infrequently.

An example of a condition that does not constitute a specific, adverse impact would be criteria that requires a project to conform with "neighborhood character". Such a standard is not quantifiable and therefore would not meet the conditions set forth under the HAA.

However, the City's findings include statements such as: "The proposed wall would obstruct visibility along Camino Real, creating adverse visual impacts contrary to policy objectives. Alternative wall treatments, such as terraced or stepped designs, could better align with scenic corridor policies while improving stability and reducing visual obstructions". This finding states "adverse visual impacts" are impacts on public health and safety, which is completely disconnected from *objective, identified written public health or safety standards*.

Even if an "adverse visual impact" was legitimate, the City's findings offer potential alternatives. The intention behind Gov Code Section 65589.5(d)(2) is that a City can only deny a project if there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. The City's findings contradict this requirement.

The City also cites the Project Site's location within a Very High Fire Severity Zone as contributing toward a Significant, Adverse Impact. While the Applicant has been working with the Riverside County Fire Department, Fire Department approval is not a stated requirement on the City's list of entitlement application requirements, as mandated by the Permit Streamlining Act in accordance with [Gov Code Section 65940](#)⁸ (see Exhibit "A" for the City's list of application requirements in effect at the time the application was submitted) and thus, cannot be used to deny an application for a Housing Development Project.

⁷ See here: <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/hcd-memo-on-haa-final-sept2020.pdf>

⁸ Gov Code Section 65940(a)(1) states, "Each public agency shall compile one or more lists that shall specify in detail the information that will be required from any applicant for a development project."

Moreover, the standard of review is based on a Preponderance of Evidence. The Notice of Decision states that “fire safety is an important consideration since the target population includes veterans who may have physical disabilities. Therefore, the project cannot proceed without addressing these fire safety requirements in compliance with the applicable policies.” Since Fire Clearance is not a listed Planning application requirement, the Project could continue to resolve Fire Department comments while preparing construction drawings and/or could have been conditioned to comply with Fire’s comments. Is it really a greater risk to the health and safety of the target population to live in a housing development that was still addressing Fire Department comments during Planning review than to remain unhoused?

(3) Are there no feasible methods to comply with specific state or federal laws?

Gov Code Section 65589.5(d)(3): The denial of the housing development project or imposition of conditions is required in order to comply with specific state or federal law, and there is no feasible method to comply without rendering the development unaffordable to low- and moderate-income households or rendering the development of the emergency shelter financially infeasible.

The Project does not violate any state or federal laws. On the contrary, the Project would advance state law, especially provisions designed to Affirmatively Further Fair Housing and satisfy the parameters set forth under Government Code section 65008, known as Anti-Discrimination in Land Use Law. As described by HCD, “This statute provides that no city shall enact or administer its laws so as to “prohibit or discriminate against any residential development ... because the development ... is intended for occupancy by persons and families of very low, low, or moderate income, as defined in Section 50093 of the Health and Safety Code, or persons and families of middle income.” (Gov. Code, § 65008, subd. (b).) Likewise, no jurisdiction may impose requirements on a residential use by persons in a protected class, including persons with disabilities and persons of very low, low, moderate, or middle income, other than those generally imposed upon other residential uses. (Gov. Code, § subd. (d)(2)(A).) These provisions are pertinent to the project as the units will be reserved for lower-income individuals and families.”⁹

(4) Is the Project Site zoned for agricultural or resource preservation?

Gov Code Section 65589.5(d)(4): The housing development project or emergency shelter is proposed on land zoned for agriculture or resource preservation that is surrounded on at least two sides by land being used for agricultural or resource preservation purposes, or which does not have adequate water or wastewater facilities to serve the project.

The Project Site is located within the R-3 Zone and the Medium-High Density Residential (“MHDR”) General Plan Land Use Designation, which is not intended for agricultural use or resource preservation.

(5) Does the jurisdiction have a compliant Housing Element and the housing development project is inconsistent with both the applicable zone AND general plan land use designation?

Gov Code Section 65589.5(d)(5): On the date an application for the housing development project or emergency shelter was deemed complete, the jurisdiction had adopted a revised

⁹ HCD Technical Assistance Letter on By-Right Supportive Housing: [Sutter Creek/Amador County Permanent Supportive Housing Project – Letter of Technical Assistance, By-Right Permanent Supportive Housing](#)

housing element that was in substantial compliance with this article, and the housing development project or emergency shelter was inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation as specified in any element of the general plan.

(A) This paragraph shall not be utilized to disapprove or conditionally approve a housing development project proposed on a site, including a candidate site for rezoning, that is identified as suitable or available for very low, low-, or moderate-income households in the jurisdiction's housing element if the housing development project is consistent with the density specified in the housing element, even though the housing development project was inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation on the date the application was deemed complete.

(B) If the local agency has failed to identify a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit, has failed to demonstrate that the identified zone or zones include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7) of subdivision (a) of Section 65583, or has failed to demonstrate that the identified zone or zones can accommodate at least one emergency shelter, as required by paragraph (4) of subdivision (a) of Section 65583, then this paragraph shall not be utilized to disapprove or conditionally approve an emergency shelter proposed for a site designated in any element of the general plan for industrial, commercial, or multifamily residential uses. In any action in court, the burden of proof shall be on the local agency to show that its housing element does satisfy the requirements of paragraph (4) of subdivision (a) of Section 65583.

The proposed supportive housing project and associated childcare facility are both permitted uses within the R-3 Zone and MHDR general plan land use designation, although all uses in the R-3 Zone require a Site Development Permit as required by JVMC Section 9.80.020(A).

Whether the City is in compliance with its Housing Element is ultimately a determination made by HCD. However, the City is in clear violation with several of its Housing Element goals, policies and commitments identified in Section H and Appendix D of the City's Housing Element, including:

Goal HE 1: *Encourage and where possible, assist in the development of quality housing to meet the City's share of the region's housing needs for all income levels and for all special needs populations.*

Policy HE 1.2: Affordable Housing. *Encourage affordable residential development on sites zoned to allow multi-family residential uses and identified in the vacant land inventory, the City will adopt development incentives and standards to encourage lot consolidation, and to allow residential development at a density of up to 25 dwelling units per acre in the Highest Density Residential (HHDR) designation, where appropriate.*

Policy HE 1.4: Housing Diversity. *Encourage the development of diverse housing types and housing densities to best meet the needs of the community.*

Policy HE 1.6 Availability of Suitable Sites. *Ensure the availability of suitable sites for the development of affordable housing to meet the needs of all household income levels, including special needs populations.*

Policy HE 1.8 Housing for Homeless Persons and Those at Risk of Homelessness. *In cooperation with other cities and/or the County of Riverside, assist in the development of emergency, transitional, permanent supportive housing and low barrier navigation centers for homeless persons and families and those at risk of homelessness.*

Policy HE 1.9 Housing for All Special Needs Groups. *Ensure and encourage the availability of housing to all Special needs populations and income levels.*

Policy HE 1.13 Code and Fee Transparency. *Ensure the City's planning and development processes regulations and fees are readily accessible and transparent.*

Action HE 1.1.24 Code and Fee Transparency. *Regularly review and update the City's website and other materials to ensure that planning and development processes, regulations and fees are readily accessible and transparent.*

Objective. Encourage and assist the feasibility of private development of affordable housing for lower income households and special needs groups, including the development of multi-family affordable units.

Action HE 1.1.4. Affordable Housing Incentives. *Consider establishing incentives for developers of new housing that is affordable to lower income households and special needs groups, such as: fast track/priority application and permit processing, density bonuses and/or fee waivers, assist affordable housing developers with right-of-way acquisition, off-site infrastructure improvements and other development costs, and assist in securing federal or state housing financing resources. Incentives should be considered for new housing developments of 100 or more units in which at least 10% of total units are sold or rented at prices affordable to households with incomes below 80% of the Riverside County Area Median Income (AMI).*

Action HE 1.1.10. City Development Fees. *Develop a sliding scale fee assistance program where the amount and type of City development fees may be waived by the City Council based on the number of affordable units proposed (i.e., as the number of affordable units increases, the amount of fee waiver increases).*

Goal HE 2: *Conserve and improve the housing stock, particularly housing affordable to lower income and special housing needs households.*

Objective: *Remove or mitigate governmental constraints to housing such as outmoded, unnecessary, conflicting and excessive requirements.*

Action HE 2.1.9: Remove Government Constraints. *Evaluate the zoning ordinance, subdivision requirements, and other City regulations to remove governmental constraints to the maintenance, improvement, and development of housing, where appropriate and legally possible. Evaluate and revise as appropriate the City's density requirements for the Highest*

Density Residential land use designation (HHDR) to address constraints for housing development including impacts on feasibility of proposals.

Goal HE 3: *Promote equal housing opportunities for all persons.*

Policy HE 3.1: Fair Housing Program. *Continue to support fair housing laws and organizations that provide fair housing information and enforcement.*

Policy HE 3.3: Housing Opportunities for Seniors, Disabled Persons, Single Parent Households, Farmworkers, Veterans, Homeless, and all other Special Needs Groups. *Encourage and, as budget allows, help support programs and activities that promote affordable housing opportunities for seniors, disabled persons, single parent household, farm workers, homeless, veterans, and all other special needs groups.*

Objective: *Ensure fair treatment of all persons in securing safe housing and to promote equal housing opportunities.*

Policy HE 3.1.9. Amend the Zoning Ordinance. *Amend the Zoning Ordinance to expand housing opportunities, as required by state and federal law, including but not limited to: amending the definition of “Family,” removing the minimum distance requirement between emergency shelters, permitting multi-family development without discretionary land use approval, providing reasonable accommodation for persons with disabilities, and encouraging development of a variety of housing for all income levels, such as manufactured housing, rental housing, mobile homes, single-room occupancy housing, employee housing and transitional and supportive housing.*

Additionally, as previously discussed, the Housing Element states that multi-family housing in the R-3 Zone and multi-family housing with 10% restricted affordable are by right. However, these statements are inconsistent with the rules and regulations in the City’s Zoning Code.

(6) Is the Project a Builder’s Remedy project?

(6) On the date an application for the housing development project or emergency shelter was deemed complete, the jurisdiction did not have an adopted revised housing element that was in substantial compliance with this article and the housing development project is not a builder’s remedy project.

The Project is not a building’s remedy project.

In conclusion, the City was unable to appropriately address the findings. It failed to provide any evidence to justify the denial much less meeting the preponderance of evidence standard required by State law.

Findings Required by State Density Bonus Law

When denying an incentive related to the SDBL, Gov. Code Section 65915(d)(1) states that Cities “shall grant the concession or incentive requested by the applicant unless the [City] makes a written finding, based upon substantial evidence, of any of the following:”

(A) The concession or incentive does not result in identifiable and actual cost reductions, consistent with subdivision (k), to provide for affordable housing costs, as defined in Section 50052.5 of the Health and Safety Code, or for rents for the targeted units to be set as specified in subdivision (c).

(B) The concession or incentive would have a specific, adverse impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5,¹⁰ upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households.

(C) The concession or incentive would be contrary to state or federal law.

Per Gov. Code 65915(d)(4), the City “shall bear the burden of proof for the denial of a requested concession or incentive” from State Density Bonus Law. The City’s SDBL ordinance conflates Incentives and Waivers, but Gov. Code Sections 65915(d) and 65915(e) clearly differentiate between the two. Incentives provide cost reductions whereas waivers allow for the physical construction of housing. Gov Code Section 65915(e)(1), which addresses waivers, states, “In no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development...”

The City’s findings only address 2 Incentives and 1 Waiver, although the Applicant had requested 6 Incentives and 4 waivers. Of the three requests for relief from otherwise applicable development standards, the City did not make the required findings as further described in Table 2 on the following page. Thus, the City did not make the required findings to deny the requests in accordance with State Density Bonus Law.

¹⁰ A “specific, adverse impact” means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. According to subparagraph (A), inconsistency with the zoning ordinance or general plan land use designation is *not* a specific, adverse impact.

Incentive/Waiver	City's Findings	Response
<p>Pedestrian Access (Incentive)</p>	<p>The project fails to provide adequate pedestrian access by omitting connections from the on-site walkways to public sidewalks, as required by Jurupa Valley Municipal Code Section 9.240.545(B)(9)a. Waiver No. 7 requests a deviation from this standard, and no right-of-way improvements are proposed. While the site plan includes pathways connecting units to on-site recreation facilities and parking spaces on one of the two parcels, the lack of sidewalks compromises pedestrian accessibility and safety, failing to comply with Jurupa Valley Municipal Code Section 9.240.545(B)(9)a. and General Plan policies promoting connectivity and accessibility. Additionally, the Americans with Disabilities Act (ADA) requires continuous, safe, and accessible routes when they are required by the local jurisdiction pursuant to California Building Code Section 11B-206.1. The absence of right-of-way improvements between the two sites and public transportation stop, a notable site arrival point, combined with the needs of the target population, which includes homeless veterans, poses specific and adverse impacts on public health and safety, as residents would be required to walk (or use wheelchairs) on right-of-way areas with steep and uneven terrain or on streets to travel between the sites. The required standard for sidewalks on local streets, such as Canyon Terrace Drive and Camino Real, includes a 5-foot-wide sidewalk on both sides of the right-of-way. The sidewalk must have a cross slope of 1.5%, with a maximum allowable slope of 2.0% to ensure compliance with accessibility and drainage requirements pursuant to Riverside County Standard 105A. The proposed project fails to comply with these requirements.</p>	<p>The Project includes an ADA-compliant path-of-travel across the entire Project Site, including necessary curb improvements to cross Canyon Terrace as shown on the submitted civil drawings.</p> <p>The surrounding area includes a decomposed granite sidewalk on the west side of Camino Real. This is the existing condition, which is not posing any specific adverse impacts on public health or safety to any of the residents in the surrounding area.</p> <p>The City has provided no substantial evidence that redeveloping a vacant site without improving sidewalks, which are not required for an otherwise ministerial project that does <u>not</u> include a subdivision, would create a new specific adverse impact on public health or safety.</p> <p>The intention of an incentive is to provide cost efficiencies to construct affordable housing. Improving new sidewalks is extremely costly and although the City has not been able to point to a requirement that the Project include the construction of new sidewalks, the Applicant has included this as an Incentive regardless.</p>

Incentive/Waiver	City's Findings	Response
<p>Parking Area Setbacks</p>	<p>The project fails to comply with Jurupa Valley Municipal Code Section 9.240.120(B)(6)(a)(i), which states, "Location of parking areas. No parking space shall be located within three (3) feet of any property line. No parking space located on driveways providing direct access to a street shall be located closer than thirty (30) feet from the property line at the right-of-way." The proposed parking layout places spaces 17 feet 5 inches from the right-of-way, falling significantly short of the required setback. This reduction in setback compromises visibility for both pedestrians and motorists, particularly at ingress and egress points, increasing the risk of vehicular and pedestrian conflicts. The proximity of parking spaces to the right-of-way limits sightlines, potentially creating safety hazards, especially for vulnerable populations such as children and individuals with disabilities. No waiver has been requested to reduce the setback to 17 feet 5 inches. Moreover, this reduced setback poses a specific, adverse impact on public health and safety.</p>	<p>Although the Applicant had initially requested an Incentive to reduce the parking area setback in order to maximize the parking provided onsite, the Applicant has since redesigned the parking layout to eliminate this request in response to the City's Zoning Compatibility Letter. Thus, this finding is no longer applicable.</p>
<p>Height of Wall Along Camino Real</p>	<p>The proposed Wakeland Camino Terrace Project includes a retaining wall along Camino Real, with sections reaching 14 and 18 feet in height. The wall is proposed at a zero setback from Camino Real, conflicting with multiple regulatory and policy standards. The retaining wall does not comply with Section 9.240.545(B)(7)(d) of the Jurupa Valley Municipal Code, which limits wall height to 42 inches within 20 feet of a street. The proposed 18-foot wall significantly exceeds this restriction.</p> <p>Additionally, the wall conflicts with Conservation and Open Space Element Policy COS 9.6, which requires the preservation of scenic views along designated scenic corridors. The proposed wall would obstruct visibility along Camino Real, creating adverse visual impacts contrary to policy objectives. Alternative wall treatments, such as terraced or stepped designs, could better align with scenic corridor policies while improving stability and reducing visual obstructions. Since the project design is not compatible for the location, it does not meet objective design standards and poses a risk to health and safety. Given these conflicts, the retaining wall</p>	<p>The City has provided no substantial evidence that an 18-foot wall, which is necessary in order to develop housing on a site with a significant grade change, poses any threat to public health and safety. See Figures 6 and 7 on the following page wherein very tall retaining walls are not causing any imminent threat to public health and safety.</p>

Incentive/Waiver	City's Findings	Response
	component does not meet development standards, and the project cannot be supported in its current form.	

Figure 6. Retaining Wall in the Sepulveda Pass

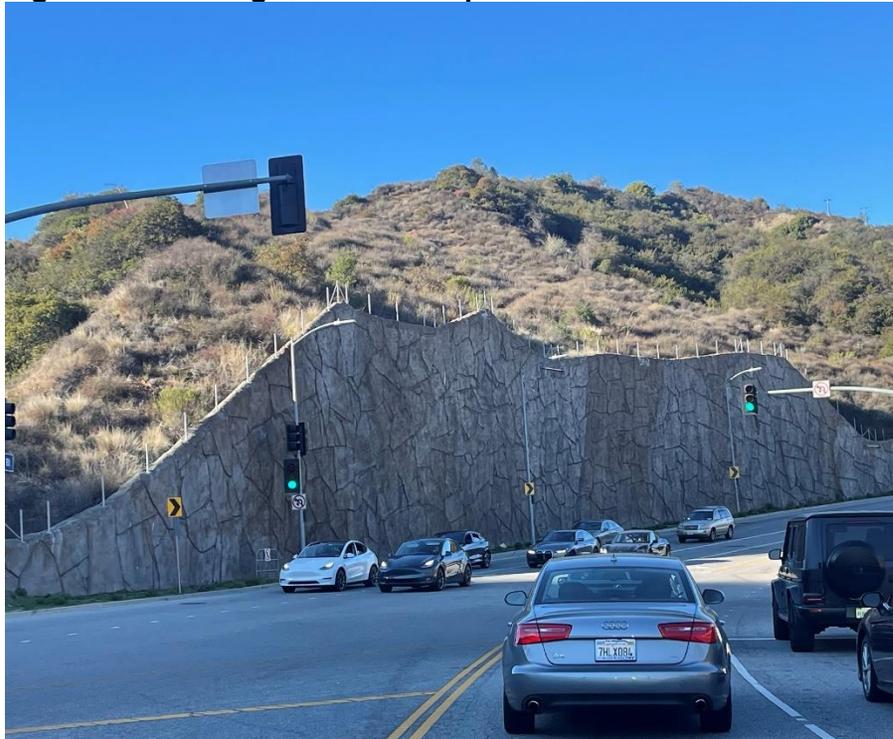


Figure 7. Retaining Wall on Private Residence driveway



ATTACHMENT NO. 4

Appeal of Planning Commission
Decision to City Council

**ATTACHMENT “A”
MA24164, SDP24074, AP25001
EXPLANATION OF THE APPEAL**

Executive Summary

The Community Development Director and Planning Commission erred in their decisions to deny the *non-discretionary* application for a new housing developing consisting of 80 homes for lower income households and veterans exiting homelessness with on-site services designed to help residents thrive including childcare, case management, financial literacy and other personalized services (the “Project”). There is an extreme need for this type of housing in Jurupa Valley as the most recent Homeless Count identified around 100 individuals experiencing homelessness in the City and the Housing Element estimates over 2,000 Extremely Low-income households.¹

The Project is proposed by Wakeland Housing and Development Corporation (the “Applicant”), a non-profit leader in building and operating affordable and supportive housing throughout California, responsible for creating more than 8,700 affordable homes across 66 properties, including many in Riverside County. The Project has been awarded funding from the California Department of Housing and Community Development (“HCD”) and services will be provided in partnership with the VA and Lighthouse Social Service Centers.

The Project is proposed on a site that was purchased by the Redevelopment Agency of the County of Riverside in 2006 with funds requiring the site be used for affordable housing. In 2012, the land was transferred to the successor agency, the Housing Authority of the County of Riverside, which currently owns the site.

At its meeting on April 28, 2025, the Planning Commission voted to deny the Project and issued a Notice of Decision on April 29, 2025. The Applicant is appealing Planning Commission’s decision to deny the Project for the following reasons:

1. **Supportive Housing Eligibility**. The Project is consistent with Supportive Housing eligibility requirements specified by both the City and State Law. Thus, the Project is a qualifying Supportive Housing Project and must be approved as a use-by-right.²
 - a. **Improper Use of Subjective Judgment instead of Objective Standards.**³ The City purports the Supportive Housing Project does not qualify based on unwritten, subjective interpretations of Supportive Housing eligibility requirements. This is in violation of State Law (see Exhibit “A” for HCD Notice of Potential Violation dated April 24, 2025).

¹ Jurupa Valley General Plan HE Table 5.15 (page 5-26).

² Government (“Gov”) Code Section 65583.2(i) defines “use by right” as “the local government’s review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a “project” for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.”

³ Housing Accountability Act (Gov Code Section 65585.5 *et seq*) limits local review of Housing Development Projects to Objective Standards defines as “criteria that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official before submittal...”

2. **Compliance with all Applicable Standards.** The Project, as designed, is compliant with applicable standards in the local code, the Americans with Disabilities Act, and the California Building Code.
 - a. **Accessibility.** The Project includes accessible paths of travel within the boundaries of the Project Site throughout the interior of site, including connections between all buildings, open spaces, across and ADA parking. The City points to conditions outside of the site, which are not regulated by the ADA or CBC. Further, no City code requires that private developers build sidewalks in the adjacent public right of way.
 - b. **Zoning Code Development Standards.** The project is either designed to be consistent with or made consistent through State Density Bonus Law (“SDBL”) with all applicable development standards within the zoning code.
3. **Housing Accountability Act (“HAA”) Required Findings.** The City did NOT make the HAA-required findings to deny an affordable housing project, specifically:
 - a. **Specific, Adverse Impacts.**⁴ The City has not provided any evidence that the Project would create a Specific, Adverse Impact upon public health and safety, let alone satisfied the HAA-mandated finding that there is a preponderance of evidence the Project would create a Specific, Adverse Impact upon public health and safety that cannot be mitigated. Instead, the City’s findings cite existing conditions, unenforceable General Plan elements and a clear misreading of the ADA requirements.

Because the City erred in denying the Supportive Housing Development for the above reasons, the Applicant is appealing the Planning Commission’s denial in accordance with Jurupa Valley Municipal Code (“JVMC”) Section 9.05.100. The Project is not discretionary and objectively consistent, or can be conditioned to be consistent with, all local and State requirements. Additionally, the City has not provided evidence of Specific, Adverse Impacts that would be created by the Project, as is required for a denial per State Law. Thus, the Applicant requests City Council approve the Project as submitted.

In addition to the justifications outlined above, the City’s zoning code is inconsistent with its Housing Element in several ways that have created obstacles in obtaining approval to construct new housing. The City’s Housing Element requires by-right processing of affordable housing at the Project Site to meet its RHNA targets based on the following provisions:

- a. **Suitable Sites Inventory.** The Project Site was listed as a Pipeline Project in the County’s 4th Cycle Housing Element, as well as a Suitable Site on the City’s 5th and 6th Cycle Housing Elements. Both State Housing Element Law⁵ and City HE Action

⁴ HAA defines Specific, Adverse Impacts as “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions... The following shall not constitute a specific, adverse impact upon the public health or safety: (A) Inconsistency with the zoning ordinance or general plan land use designation” (Gov Code Section 65589.5(d)(2)).

⁵ Gov Code Section 65583.2(c) states: “...a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality’s housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (3) of this subdivision and the site is subject to a program in the housing element requiring rezoning by the applicable deadline

Item 1.1.1⁶ require rezoning or housing overlays to make sites available for by-right processing when housing projects include at least 20% restricted affordable on vacant sites identified as a suitable site in two consecutive housing elements (see Exhibit “B” for HCD’s March 14, 2025, Letter of Inquiry regarding the City’s compliance with this rezoning effort);

- b. **Multi-Family Ministerial Review.** The City’s Housing Element purports that all multi-family housing with 10% restricted affordable is processed via a Ministerial Site Development Permit (Housing Element, Page 5-85), but the City’s Zoning Code is not consistent with this statement;
- c. **R-3 Zone Multi-Family By Right.** The City’s Housing Element purports that all multi-family housing in the R-3 Zone is allowed by right (Housing Element, Page 5-88), but the City’s Zoning Code requires Site Development Permits for all development in the R-3 Zone.
- d. **HE Action 1.1.6 Affordable Housing Development Review.** The City’s Housing Element directs staff to “Develop SB35 expedited review process guide and qualification checklist for the development of affordable housing units in the City for developers.” The Project is eligible for SB 35 streamlining; however, the City has refused to carry out this process.
- e. **RHNA Commitments.** The City has committed to permitting 4,497 units. According to HCD’s Housing Element Implementation and Annual Progress Report dashboard,⁷ the City has only permitted 441 units or 9.8% of its RHNA targets at 50% through the 6th Cycle and none of the permitted units have been deed restricted for income-qualifying households

for rezoning set forth in subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households.”

⁶ HE Action Item 1.1.1: General Plan and Zoning Amendments... address all byright requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i); and amend the Zoning Ordinance as appropriate to be consistent with the General Plan.

⁷ HCD Annual Progress Report dashboard: <https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard>

1. Supportive Housing Eligibility

Jurupa Valley Supportive Housing Requirements (JVMC Section 9.240.555)

On May 4, 2023, the City Council adopted a Zoning Code Amendment in Ordinance No. 2023-08⁸ to add JVMC Section 9.240.555⁹ for ministerial processing of Supportive Housing Projects. JVMC Section 9.240.555.B(1) states:

Supportive housing shall be permitted by right in any zone where multifamily and mixed uses are permitted if the proposed housing development satisfies all requirements of Government Code Section 65651(a)."

State Supportive Housing Requirements (Gov Code Section 65651(a))¹⁰

AB 2162 (2018) created a by-right approval process for housing development projects meeting specific requirements detailed in Gov Code Section 65651(a) ("Supportive Housing Projects"). See Table 1 below for the Project's consistency with these requirements.

Table 1. Project Compliance with Supportive Housing Eligibility Requirements

Gov Code Section 65651(a)	Project Compliance
(1) Units within the development are subject to a recorded affordability restriction for 55 years.	The Project will provide deed-restricted housing for lower income households for a minimum 55 years.
(2) One hundred percent of the units, excluding managers' units, within the development are restricted to lower income households and are or will be receiving public funding to ensure affordability of the housing to lower income Californians...	The Project will provide 100% of units, excluding one unrestricted manager's unit, for lower income households.
(3) At least 25 percent of the units in the development or 12 units, whichever is greater, are restricted to residents in supportive housing who meet criteria of the target population... ¹¹	The Project will provide 28 units (35%) of the units for unhoused veterans.

⁸ See Ordinance No. 2023-08:

https://library.municode.com/ca/jurupa_valley/ordinances/municipal_code?nodId=1218844

⁹ See JVMC Section 9.240.555:

https://library.municode.com/ca/jurupa_valley/codes/municipal_code?nodId=TIT9PLZO_CH9.240GEPR_S9.240.555_SUHO

¹⁰ See Gov Code Section 65651:

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65651.&lawCode=GOV

¹¹ Gov Code Section 65650(d) refers to Health and Safety Code Section 50675.14 to define Target Population, which states that "Target Population" means "persons, including persons with disabilities, and families who are 'homeless...'"

Supportive Housing Eligibility

Gov Code Section 65651(a)	Project Compliance															
<p>(4) The developer provides the planning agency with the information required by Section 65652:</p> <p>(a) The name of the proposed entity or entities that will provide supportive services.</p> <p>(b) The proposed funding source or sources for the provided onsite supportive services.</p> <p>(c) Proposed staffing levels.</p>	<p>(a) Lighthouse Social Service Center,</p> <p>(b) California Department of Housing and Community Development Veteran's Housing and Homeless Prevention funds ("VHHP")</p> <p>(c) 2 staff.</p>															
<p>(5) Nonresidential floor area shall be used for onsite supportive services and administrative office space in the following amounts:</p> <p>(B) For a development with more than 20 units, at least 3 percent of the total floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.</p>	<p>The Project proposes more than 3% of its total floor area for services meeting this requirement as further detailed below:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #d8bfd8;">Use</th> <th style="background-color: #d8bfd8;">SF</th> <th style="background-color: #d8bfd8;">% of Total</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td style="text-align: center;">66,857</td> <td style="text-align: center;">88%</td> </tr> <tr> <td>Supportive Services Building (residents only)</td> <td style="text-align: center;">2,718</td> <td style="text-align: center;">4%</td> </tr> <tr> <td>Child Care Building (open to residents & general public)</td> <td style="text-align: center;">6,347</td> <td style="text-align: center;">8%</td> </tr> <tr> <td style="text-align: center;">Total</td> <td style="text-align: center;">75,922</td> <td style="text-align: center;">100%</td> </tr> </tbody> </table>	Use	SF	% of Total	Residential	66,857	88%	Supportive Services Building (residents only)	2,718	4%	Child Care Building (open to residents & general public)	6,347	8%	Total	75,922	100%
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Child Care Building (open to residents & general public)	6,347	8%														
Total	75,922	100%														
<p>(6) The developer replaces any dwelling units on the site of the supportive housing development in the manner provided in paragraph (3) of subdivision (c) of Section 65915.</p>	<p>There are no existing units on-site.</p>															
<p>(7) Units within the development, excluding managers' units, include at least one bathroom and a kitchen or other cooking facilities, including, at minimum, a stovetop, a sink, and a refrigerator.</p>	<p>All units will include a kitchen and a bathroom.</p>															

Supportive Housing Eligibility

1.a Objective Review of “On-Site” Supportive Services

The Housing Accountability Act (Gov Code Section 65589.5 *et seq.*) requires Housing Development Projects be reviewed in accordance with Objective Standards, defined as:

[C]riteria that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official before submittal...

The Planning Commission determined that the presence of a public street through the Project Site precludes the Project from being a Supportive Housing Project with the following finding:

The Project is bisected by Canyon Terrace Drive, dividing it into two separate sites: the 5.88-acre southern portion, which includes six multi-story multifamily buildings with 28 supportive housing units, 51 affordable units and one manager's unit, and the 9.65-acre northern portion, which contains a 2,560-square-foot community building with supportive services, laundry facilities, and outdoor spaces, along with a 6,463-square-foot child daycare center. As the supportive services are provided on a separate site and not on the same site as the supportive housing, the Project does not meet the requirement of providing onsite supportive services.¹²

Because the definition of onsite is not defined by law, the City came to this conclusion using personal or subjective judgment. There is nothing in State Law or otherwise that prohibits a Supportive Housing Project from being developed on a large, campus-like project site or on a site divided by a public street. HCD has reviewed AB 2162 eligibility requirements and also concluded that “there is nothing in AB 2162 that would prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development.” See Figure 1 below and Exhibit “A.”

Figure 1. Excerpt from HCD’s Notice of Potential Violation (April 24, 2025)

Can a site that is bisected by a roadway be developed as a single permanent supportive housing development? If so, to what extent does the roadway dividing the site need to have pedestrian connectivity?

There is nothing in AB 2162 that would prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development. The 3-percent onsite supportive services requirement would be applied to the project overall and not to each constituent part of the project site.¹⁵ Where onsite supportive services are mentioned, they are referred to in the context of a singular “development.” However, the Government Code text does not preclude the City from conditioning its approval on intersection improvements as previously mentioned.

Although AB 2162 does not explicitly contemplate project sites divided by public streets, two other similar streamlining programs do address this issue. Specifically, the Streamlined Ministerial Process, commonly referred to as SB 35 (Gov Code Section 65913.4(a)(2)(B)), and the Affordable Housing and High Road Jobs Act of 2022, commonly referred to as AB 2011 (Gov Code Section 65912.103(b)).

¹² Resolution No. PC-2025-06, Page 3.

Supportive Housing Eligibility

SB 35 (Gov Code Section 65913.4) explicitly allows site to include multiple parcels divided by a street, stating:

(a) Except as provided in subdivision (r), a development proponent may submit an application for a development that is subject to the streamlined, ministerial approval process provided by subdivision (c) and is not subject to a conditional use permit or any other nonlegislative discretionary approval if the development complies with subdivision (b) and satisfies all of the following objective planning standards:

(2) The development and the site on which it is located satisfy all of the following:

*(B) At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses. For the purposes of this section, **parcels that are only separated by a street or highway shall be considered to be adjoined.***

AB 2011 (Gov Code Section 65912.103) states:

For purposes of establishing the total number of units in a development under this chapter, a development project includes both of the following:

(a) All projects developed on a site, regardless of when those developments occur.

*(b) **All projects developed on sites adjacent to a site developed pursuant to this chapter if, after January 1, 2022, the adjacent site had been subdivided from the site developed pursuant to this chapter.***

Additionally, although AB 2162 does not define “on-site,” a “Project Site” has several common applications in land use practice. For example, the California Environmental Quality Act (“CEQA”) prohibits piecemealing, the practice of “chopping up” a large project into smaller pieces if the individual project components are functionally dependent on one another. Since the proposed Community Building only provides accessory uses to the primary residential use, the Community Building cannot be independent from the rest of the project for CEQA purposes.

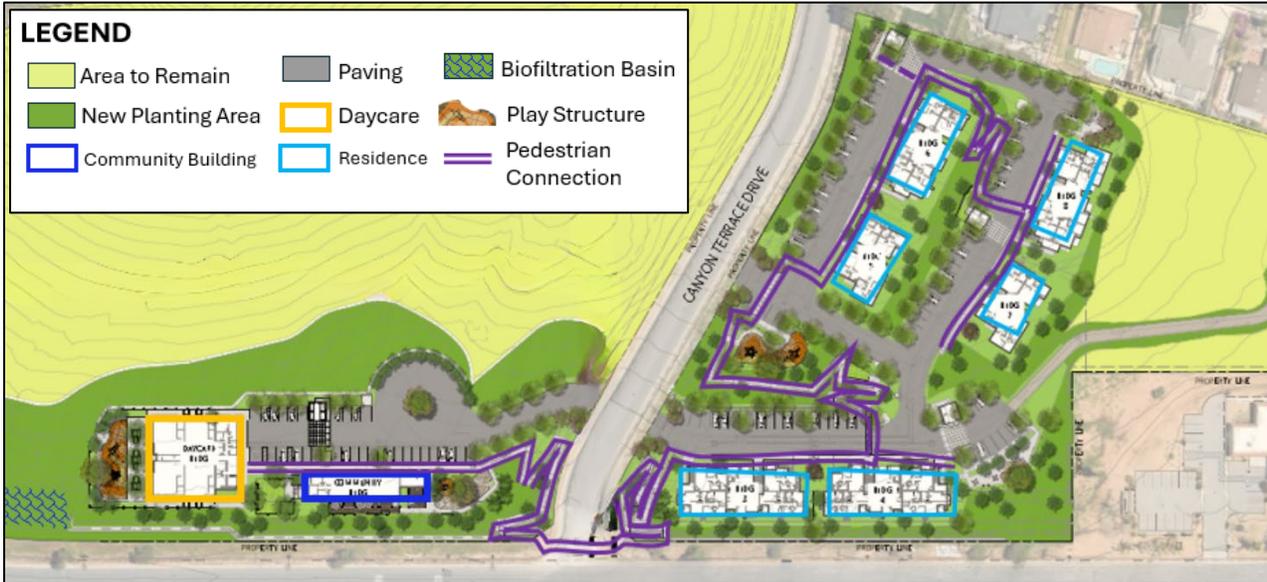
The provision of on-site childcare is also intricately linked to the Supportive Housing Project. Please refer to the letter issued by the California Housing Defense Fund on April 28, 2025 (see Exhibit “C”), which states:

The provision of onsite childcare is a service that directly supports the needs of the residents of the development. While Government Code section 65651, subdivision (a)(5)(B) requires that at least 3% of the total floor area be for supportive services that are exclusively for tenant use, this section of law does not state that floor area above and beyond the 3% floor must be exclusively for tenant use.

Since the streamlining provision of AB 2162 is, in part, a CEQA exemption, it is unclear how the City proposes to review the Project by its individual parcels.

Lastly, the Project is objectively a unified development with eight operationally interdependent buildings designed with a common Craftsman Eclectic architectural style and landscape program. An ADA-compliant pedestrian path will connect all buildings to one another as well as to all open space areas and vehicle parking. See Figure 2 on the following page.

Figure 2. Site Plan



In summary, the City's statement that the proposed services are separate from the Project is inconsistent with State Law. The City's conclusion that the supportive services are not on-site is an entirely subjective interpretation, which cannot be used as basis for denial.

2. Compliance with Applicable Standards

The Staff Report in advance of the Planning Commission hearing lists several standards that Staff claims the Project is out of compliance. However, the Project, as submitted, is fully compliant with the cited standards, either through design or with SDBL, or can be made compliant with minor changes. The Applicant has offered to meet with Staff to discuss the Project on several occasions throughout the entitlement review to clarify any confusion about the Project, but Staff has yet to schedule a meeting with the Applicant's design team to discuss any outstanding questions. Many of these misunderstandings could have been easily resolved through a dialogue with the Project Team or as a condition of approval. It is also critical to highlight that the use of Incentives and Waivers through SDBL does not make a project inconsistent with applicable Objective Standards based on the following provision in the HAA (Gov Code Section 65589.5(j)(3)):

the receipt of a density bonus, incentive, concession, waiver, or reduction of development standards pursuant to Section 65915 shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity, with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision specified in this subdivision.

2.a. American Disabilities Act (“ADA”) and California Building Code (“CBC”) Compliance

Resolution No. PC-2025-06 states, “Wakeland is refusing to comply with requirements imposed by the Americans with Disabilities Act and the California Building Code.” This statement has no merit. There are no requirements, in either the ADA or CBC, that a private developer construct public sidewalks on public property.

The Applicant is absolutely committed to complying with all state and federal accessibility requirements and believes the Project is compliant as currently designed. This commitment has been reaffirmed in writing in its Response letter to the Planning Commission Staff Report and stated it publicly at the Planning Commission hearing. The Applicant has engaged an architect licensed by the State of California to design the project in compliance with all accessibility regulations.¹³ Additionally, the Applicant has engaged a Certified Access Specialist (“CAsp”) to work with the architect and review the Project for consistent with all state and federal accessibility requirements, including the ADA and CBC. Both the architect and the CAsp report that the Project's site access is consistent with all ADA requirements. If the City is concerned about accessibility, the City can condition the Project to be consistent with Objective ADA standards; however, the Applicant is legally obligated to comply with the ADA and CBC regardless of such a condition.

The City cites CBC 11B-206.2.1¹⁴ and the following regarding Site Arrival Points (see Figure 3 on following page):

¹³ Rodriguez Associates Architects & Planners, Inc. For more information regarding the architect, see here: <https://www.ra-architects.net/principal>

¹⁴ CBC Section 11B.206.2.1, actually says: *At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger drop-off and loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. When more than one route is provided, all routes must be accessible. site arrival points and the building or facility entrance if the only means of access between them is a vehicular way not providing pedestrian access.”*

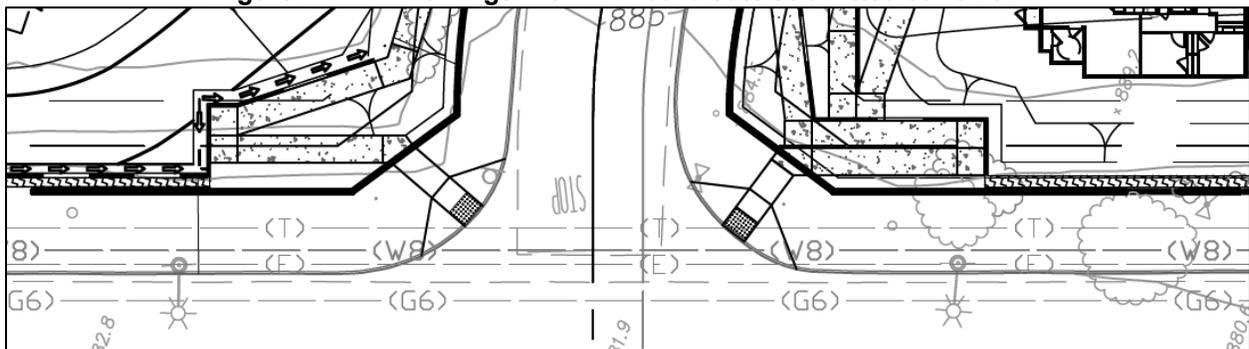
Figure 3. Page 5 from Resolution No. PC-2025-06

*The Project also does not comply with the requirements set forth in California Building Code, Title 24 of the California Code of Regulations Section 1114B.1.2, which states that “when a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7, and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances, and between the building and the public way. . . **At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones, and public streets or sidewalks,** to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility. An accessible route shall connect at least one accessible entrance of each accessible dwelling unit with those exterior and interior spaces and facilities that serve the accessible dwelling unit. Where more than one route of travel is provided, all routes shall be accessible.”*

This code section clearly describes site access requirements **within the site** and not beyond the boundaries of the site. The City implies that this ADA requirement means that a private developer is required to construct new sidewalks outside the boundaries of private property to a public transportation stop. However, this is a misreading of the requirement, which actually says that if there is a public transportation stop serving the project within the boundaries of the site, then there must be an ADA path of travel from that public transportation stop to the facility its serving. Given that this requirement also applies to hospitals and government facilities throughout the State, it is logical that new hospital buildings have an ADA connection to a public transit stop serving that hospital. However, it is rare for a public transit route to be tailored specifically to serve a housing project, let alone a housing project with only 80 dwelling units.

The Project *does* meet CBC accessibility requirements within the boundaries of the site, as designed, and includes a 5-foot wide, ADA-compliant pedestrian path connecting all buildings throughout the Project Site **including proposed ADA-compliant curb ramps at the intersection of Canyon Terrace and Camino Real**. This intersection improvement has been shown on the civil drawings provided with each application submittal since June 21, 2024.

Figure 4. Civil Drawings with ADA curb cuts submitted June 2024



Compliance with Applicable Standards

Please note, **Planning is not the agency responsible for reviewing off-site improvements.** For Planning's review of zoning consistency, the Applicant submitted conceptual entitlement drawings, as these matters are typically reserved for the permitting phase of the project. As a result, Planning can broadly condition the Project to be consistent with ADA requirements, but the City should not be using ADA compliance as a reason to deny the project for zoning consistency.

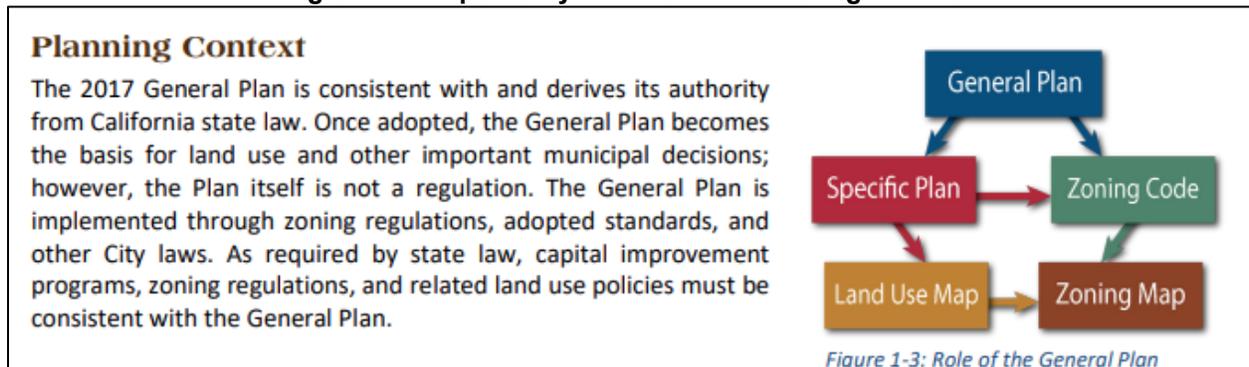
General Plan Policies

The City has also cited policies in the General Plan as a reason the Project is not consistent with the applicable Objective Standards. However, Page 1-9 of the City's General Plan, as shown in Figure 5 below, clearly states the role of the General Plan:

General Plan becomes the basis for land use and other important municipal decisions; however, the Plan itself is not a regulation. The General Plan is implemented through zoning regulations, adopted standards, and other City laws.

As stated within the General Plan, the policies in the General Plan (including the Mobility Element) provide direction for the City to prepare implementation ordinances accordingly. These policies are not intended to be public health and safety standards and they are not Objective standards for private developers manifest. Since the City has not yet adopted an implementation ordinance for non-subdivision housing developments to make off-site improvements, the referenced Mobility Plan policies are limited to an advisory role.

Figure 5. Jurupa Valley General Plan Planning Context



The City has failed to provide an Objective Standard that requires private developers to construct new off-site improvements.¹⁵

¹⁵ Resolution No. PC-2025-06 states that the Applicant is requesting an Incentive for relief from constructing new sidewalks. While the Applicant has requested relief from a requirement to connect the on-site pedestrian path to a public sidewalk since there are no existing sidewalks, the Applicant is not requesting relief from a requirement to construct sidewalks because the City has yet to provide a requirement as such.

Compliance with Applicable Standards

2.b. Consistency With Applicable Development Standards

LEGEND	 Per Code	 Administrative SDBL	 SDBL Incentive	 SDBL Waiver
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Development Standard	Code Section(s)	Required/Permitted		Proposed
Density	Land Use Element Table 2.4, Gov Code Section 65915(f)(3)(D)(i)	Base Density: 126 units 80% Density Bonus: 228 units		80 units
Affordability	JVMC Section 9.240.555.B(1), Gov Code Section 65651(a)(2)	100% of units, excluding manager's unit, for Lower Income Households		100% of units, excluding manager's unit, for Lower Income Households
Unit Sizes	JVMC Section 9.240.110	Minimum 750 SF		593 SF (See Unit A1, Sheet A0.1)
Lot Area	JVMC Section 9.80.030(1)	Minimum 7,200 SF		185470001: 121,532 SF 185470002: 134,600 SF 185460001: 420,354 SF
Setbacks – South Site	JVMC Section 9.80.030(2) and (3)	Front (Camino Real)	15 feet	25'
		Side (Canyon Terrace)	15 feet	57'-8"
		Side (internal)	10 feet	56'-6"
		Side (Limonite)	15 feet	306'-10"
		Rear	15 feet	56'-11"
Setbacks – North Site	JVMC Section 9.80.030(2) and (3)	Front (Camino Real)	10 feet	33'-6"
		Side (Canyon Terrace)	10 feet	133'
		Side (Lakeside Drive)	10 feet	199'-4"
		Rear	10 feet	428'-4"
Lot Coverage	JVMC Section 9.80.030(4)	Maximum 50%		North Site: 2% South Site: 11%
FAR	JVMC Section 9.80.030(5)	2 to 1		North Site: 0.02 to 1 South Site: 0.26 to 1
Height	JVMC Section 9.80.030(6)	Maximum 50 feet		Up to 37.5 feet

Compliance with Applicable Standards

Parking	JVMC Section 9.240.555.B(2), Gov Code Section 65915(p), JVMC Section 9.240.120.B(1)(b)(ii)	Day Care: 6 spaces Residential: 71 spaces Total: 77 spaces	North Site: 31 spaces South Site: 74 spaces Total: 106 spaces (see notes below regarding parking layout and shading compliance, which would result in 101 spaces in lieu of 106)
Parking Layout	JVMC Section 9.240.120.B(6)(a)(i)	30 feet from PL at driveway	17' 5" from PL at driveway (South Site) Project can be revised to comply by eliminating 2 parking spaces.
Accessible Parking	JVMC Section . 9.240.120(6)(c)(ii)	ADA parking to provide most direct access to primary entrances of buildings.	ADA parking provided to provide the most direct access to primary building entrances to which the parking space serves.
Driveway Dimensions	JVMC Section 9.240.120.B(6)(a)(ii)	24 feet	At least 26 feet
Parking lot shading	JVMC Section 9.240.120.B(7)(e)	North Site: 40% South Site: 50%	North Site: 29% South Site: 53.5% Project can be revised to comply by eliminating 3 parking spaces.
Parking lot landscaping screening	JVMC Section 9.240.120.B(7)(f)(i)(j)	3-foot high x 3-foot wide berm – OR - 5-foot wide planter at right-of-way with 3-foot high shrubbery	20-foot wide in-ground planter at right-of-way with 3-foot high shrubbery
Private Open Space	JVMC Section 9.240.545.B(1)	Min. Dimensions: 8 ft x 5 ft Min. SF – Ground Floor: 115 SF Min. SF – Above Ground: 75 SF Ground Level Wall Height: 6 feet Above Ground Screen Height: 42"	Private open space will be provided, however, Incentive request to eliminate the private open space requirement. Thus, no private open space will be designed to satisfy this requirement.
Common Open Space	JVMC Section 9.240.545.B(2)(c)	12,000 SF	15,555 SF
Laundry Facilities	JVMC Section 9.240.545(B)(3)	1 washer/dryer per unit	Communal laundry facility with 8 washers and 8 dryers
Accessory Storage	JVMC Section 9.240.545(B)(4)(a)	35 cubic feet in dwelling unit	At least 35 cubic feet in unit
Accessory Storage	JVMC Section 9.240.545(B)(4)(b)	60 cubic feet outside unit	0 cubic feet
Parking	JVMC Section 9.240.545(B)(5)	Parking Management Plan	Daycare parking: North Site Residential parking: South Site
Landscape Buffer	JVMC Section 9.240.545(B)(6)	20-foot landscape buffer along all rights-of-way	20-foot landscape buffer along all rights-of-way
Trees in Landscape Buffer	JVMC Section 9.240.545(B)(6)	Trees planted every 30 feet	Trees planted every 30 feet

Compliance with Applicable Standards

Walls and Fences - Materials	JVMC Section 9.240.545.B(7)(a)	Concrete block walls that includes split-face or slump stone walls	Walls will be concrete block that includes split-face or slump stone walls
Walls and Fences – Commercial buffer	JVMC Section 9.240.545.B(7)(b)	6-foot wall	6-foot wall
Walls and Fences - Height	JVMC Section 9.240.545.B(7)(d)	3.5 feet within 20 feet of street setback	18 feet at Property Line
Buffers, abutting commercial	JVMC Section 9.240.545.B(8)(a)	50-foot setback	50+ foot setback
Pedestrian Access	JVMC Section 9.240.545.B(9)	Pedestrian connection from units to public sidewalk, parking spaces and recreational facilities	Pedestrian connection from all residential buildings to one another, to parking and to open spaces, but does not connect to public sidewalks
Project Design	JVMC Section 9.240.545(B)(11)(a)	> 2 stories: 15-foot setback + 30 feet = 45 feet	21 feet 2 inches
Roof	JVMC Section 9.240.545(B)(11)(c)	Composition shingle roofs are prohibited.	No composition shingle roofs are proposed.
Architectural Style	JVMC Section 9.240.545(B)(11)(d)	Architectural Style: Spanish Colonial, Craftsman, Victorian, California Bungalow, American Farmhouse or California Ranch	Craftsman
Impact Mitigation	JVMC Section 9.240.545(B)(12)	Submit Traffic Impact Assessment, Biological assessment, Phase I	Traffic Impact Assessment, Biological assessment, Phase I provided
Lighting	JVMC Section 9.240.545(B)(13)	Lighting shall direct only onto project site.	Lighting will be screened to project only onto Project Site.
Refuse	JVMC Section 9.240.545(B)(14)	Per City's solid waste hauler franchisee	Per City's solid waste hauler franchisee

3. Housing Accountability Act Required Findings

The City did NOT provide a Preponderance of Evidence that the Project would create a Specific, Adverse Impacts upon Public Health and Safety for which there are no feasible methods to mitigate or avoid as required by Gov Code Section 65598.5(d).

Preponderance of Evidence Standard of Review

HCD defines a Preponderance of Evidence as:

Findings or determinations based on a “preponderance of the evidence” standard require that local governments weigh the evidence and conclude that the evidence on one side outweighs, preponderates over, is more than the evidence on the other side, not necessarily in the number or quantity, but in its convincing force upon those to whom it is addressed. Evidence that is substantial, but not a preponderance of the evidence, does not meet this standard.¹⁶

Specific, Adverse Impact

Gov Code Sections 65589.5(d)(2) and (j)(1)(A) defines a Specific, Adverse Impact as:

a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

Inconsistency with the zoning ordinance or general plan land use designation is not such a specific, adverse impact upon the public health or safety.

HCD provides further clarification regarding Specific, Adverse Impacts:

An example of a condition that does not constitute a specific, adverse impact would be criteria that requires a project to conform with “neighborhood character”. Such a standard is not quantifiable and therefore would not meet the conditions set forth under the HAA.¹⁷

It is critical to highlight that a Specific, Adverse Impact cannot be an existing condition. An existing condition is not an impact created by a future project. This clarification is necessary because the City has claimed that there will be a Specific, Adverse Impact because there are no existing sidewalks adjacent to the Project Site on the east side of Camino Real. There is no evidence that new residential development in an existing residential neighborhood without sidewalks creates a new Specific, Adverse Impact on public health and safety because there are no existing sidewalks.

Resolution No. PC-2025-06 has cited that this will create a dangerous situation because the “residents, including children, of the Project... will need to travel along Camino Real where the speed limit is 40 miles per hour in order to get to and from the Project Site and the bus stops

¹⁶ HCD, Housing Accountability Act Technical Assistance Advisory, September 15, 2020. Page 13: <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/hcd-memo-on-haa-final-sept2020.pdf>

¹⁷ *Ibid.*

Housing Accountability Act Required Findings

located on the corners of Limonite Avenue and Camino Real.” If the City feels the speed that cars drive along Camino Real is creating a hazardous situation, the City should adjust the speed limit or implement other traffic calming measures. However, this is an existing condition and not an impact created by a future project.

Public Health or Safety Standards

An example of a Public Health or Safety Standard would be that according to the California Ambient Air Quality Standard, exposure to 50 µg/m³ of particulate matter PM10 over the course of 24 hours can result in premature mortality. If a Project were to create a release of particulate matter above this threshold and there were no feasible methods to reduce the release of particulate matter, then a Project would create a Specific, Adverse Impact on Public Health or Safety. This example would satisfy the requirement because it’s a measurable, written standard published by the California Air Resources Board¹⁸ that could result in troubling health impacts.

However, with respect to the proposed Supportive Housing Project, there is no evidence, in the record or otherwise, that the Project will have Specific, Adverse Impact on Public Health or Safety. On the contrary, the Project will improve public health and safety by providing affordable housing for lower income families and veterans with disabilities, providing affordable childcare for working families, clearing fire-prone invasive weeds from the property and planting over 200 new trees throughout the Project Site.

Planning Commission’s Findings do not identify a Preponderance of Evidence that the Project will create a Specific, Adverse Impact on Public Health or Safety.

The City’s findings do NOT meet the definition of a Specific, Adverse Impact because:

- The City identifies an existing condition – the lack of public sidewalks on the east side of Camino Real --not a project impact,
- The City does not identify what measurable impact the Project would have on public health or safety,
- The cited policy is a General Plan policy, not an objective public health or safety standard, and
- Even if the cited policy were an Objective Standard, State Law clearly details that inconsistency with a zoning ordinance is not a Specific, Adverse Impact on public health and safety.

Other Potential Impacts Have Already Been Studied

The City’s Development standards for Multiple family dwellings (JVMC Section 9.240.545.B(12)) require that an Applicant for a multi-family housing project submit several environmental analyses, which were submitted with the application in June 2024.

Although not specifically cited in the Planning Commission’s Findings, the Supportive Housing Project’s potential impact on traffic was discussed during the public hearing as a potential concern. As part of the original application, the Applicant submitted a Traffic Impact Analysis prepared by a traffic engineering firm Linscott, Law & Greenspan Engineers (see Exhibit “D”).

¹⁸ California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10) <https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health>

Housing Accountability Act Required Findings

This report, which uses data from the ITE Trip General Manual 11th Edition, concludes that the Project will not create a new traffic impact that would require street improvements.

The Cultural Resources Assessment, Biological Resources Assessment and Fire Protection Plan have also been completed. See Exhibit “E”. Additionally, see Exhibit “F” for the determination from the Riverside County Airport Land Use Commission wherein it is determined that the Project will not create adverse impacts on airport activities and the Federal Aviation Administration aeronautical study determination that the proposed structures do not exceed obstruction standards and would not be a hazard to air navigation.

Based on the studied cited above, the Project will not have impacts or require mitigation measures regarding traffic, cultural resources, biological resources, fire safety or air navigation.

Finally, denial must be limited to projects with impacts that cannot be mitigated. Even if the “impacts” that the City has raised (including external sidewalks, internal ADA access and on-site childcare services) were found to be significant, they can all be mitigated by constructing sidewalks, ensuring ADA-compliant site design and removing the childcare facility from the project, respectively.

In conclusion, the City has failed to find a Specific Adverse Impact on Public Health and Safety based on a preponderance of evidence that cannot be mitigated. Instead, the City has cited denial based on existing conditions, unenforceable General Plan elements, and clear misreadings of the ADA and California Building Code. Therefore, denial of the Supportive Housing Project must be overturned.

Housing Element – Unmet Housing Element Commitments to Meet RHNA Targets

The California Department of Housing and Community Development (HCD) may revoke a housing element's compliance if a local government takes actions that are inconsistent with either the adopted housing element or state law. As outlined above, the City's actions conflict with several state laws. Beyond these violations, the City's Housing Element requires by-right processing of affordable housing at the Project Site, regardless of whether the Project is a Supportive Housing Project, to meet its RHNA targets based on the following provisions:

2.a. Suitable Sites Inventory – By-Right Processing Commitments

The Project Site was listed as a Pipeline Project in the County's 4th Cycle Housing Element, as well as a Suitable Site on the City's 5th and 6th Cycle Housing Elements. State Housing Element Law requires rezoning to permit by-right processing for projects with 20% restricted affordable on vacant sites used in 2 consecutive housing elements (Gov Code Section 65583.2(c)).¹⁹

Accordingly, the City's Housing Element also states that Zoning Amendments are required to permit by-right processing for multi-family housing on sites identified as a Suitable Site will be **carried out by October 15, 2023:**

***HE Action 1.1.1. General Plan and Zoning Amendments**... address all byright requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i);²⁰ and amend the Zoning Ordinance as appropriate to be consistent with the General Plan.*

The City has reached a level of delinquency with implementing its own proposed Zoning Amendments that HCD issued a Letter of Inquiry on March 14, 2025, which says:

To ensure the City continues to meet the 6th cycle update requirements for a substantially compliant housing element, HCD requests that the City provide an update on the status and timeline of implementation of Action HE 1.1.1 by April 14, 2025, and submit any adopted rezones and accompanying resolutions to HCD for review.

HCD will consider any written response before taking further action authorized by Government Code section 65585, subdivision (i), including issuance of a Corrective Action Letter and revocation of HCD's finding of housing element compliance.

The Applicant is unaware of how the City has responded to this inquiry. Regardless, the Applicant is familiar with the fact that the R-3 Zone requires a Site Development Permit for all multi-family housing regardless of whether a project includes 20% restricted affordable or whether the site has been identified as a suitable site on multiple consecutive Housing Elements.

¹⁹ See Gov Code Section 65583.2 here:

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65583.2.&nodeTreePath=12.1.10.10&lawCode=GOV

²⁰ Gov Code Section 65583.2(h)(1) states. "The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for lower income households allocated pursuant to Section 65584 for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower income households during the planning period."

Unmet Housing Element Commitments

The City has responded to previous comments regarding the Project Site's inclusion as a Suitable Site by saying the Housing Element only assigned 32 above-moderate income units to the Project Site (Table A-3, HE Appendix A). However, Gov Code section 65583.2(c)(1) requires the inventory to be calculated based on **minimum realistic capacity** and vacant sites used on previous inventories cannot be calculated toward the affordable unit requirement. Thus, the units analyzed within the suitable sites inventory is not a maximum and the affordability assigned does not preclude projects from including more affordable.

2.b. Multi-Family Ministerial Review.

The Applicant raised concerns that the City does not have a by-right process for multi-family development with 10% restricted affordable as stated in the City's Housing Element. This is stated as a fact within the Housing Element text on page 5-85, which says:

In 2020, the City adopted objective multifamily residential development standards (MMC 92.40.545) to facilitate the ministerial review of multifamily housing projects that reserve a minimum of 10% of the units affordable to lower income households.

However, no such program exists. The City addressed this in the Staff Report to the Planning Commission. Staff's response is copied in Figure 3 below.

Figure 6. Page 18 of the Staff Report to Planning Commission

- **Ministerial by right approval project for multifamily housing projects** - Wakeland claims that the project should be processed ministerially, as the City's Housing Element states that multifamily housing with at least 10% affordable units qualifies for by-right approval. Wakeland did not, however, apply for a multifamily housing project but rather is seeking approval of a supportive housing project through the ministerial process created by Government Code Section 65650 *et seq.* Therefore, this argument is not relevant to whether the Community Development Director properly denied Wakeland's application for a ministerial approval of a supportive housing project with a childcare center.

Staff's response is insufficient for the following reasons:

2. The Project is a multi-family housing project with on-site supportive services offered to both residents and the greater community. Supportive Housing and Multi-Family Housing uses are not mutually exclusive and most Supportive Housing Projects are also Multi-Family Housing developments.
3. Craig Lawson & Co., LLC inquired with the City regarding any ministerial processing options for multi-family housing in February 2024. Staff provided the following response, "We confirmed that we do not have a ministerial site development permit program." See Exhibit "G" for email correspondence regarding this topic.

2.c. R-3 Zone Multi-Family By Right.

The City's Housing Element also purports that all multi-family housing is by-right in the R-3 Zone (see Figure 6 on the following page). If this were true, the Project would only need to be reviewed

Unmet Housing Element Commitments

in accordance with State Density Bonus Law. However, all uses in the R-3 Zone require a Site Development Permit as required by JVMC Section 9.80.020(A).

Figure 7. Housing Element Page 5-88

Land Use Controls Analysis

The City of Jurupa Valley's development approval process is designed to accommodate, not hinder, residential development. For example, developments of single-family homes and manufactured homes on existing, individual lots in any residential zones that meet development standards (setbacks, lot size and coverage, building height, parking) do not require discretionary approval. They require only a building permit – a ministerial process – to allow construction. Similarly, multi-family housing is allowed “by right” in the R-3 Zone (General Residential). In all residential zones that do not allow multi-family by right would require a Site Development Permit (SDP). As

2.d. Affordable Housing Development Review – SB 35

The City's Housing Element Objective to “Encourage and assist in the expedited housing development of affordable housing through state law qualification process to promote the production of affordable housing” includes an Action Item for the following:

HE 1.1.6: *Develop SB35 expedited review process guide and qualification checklist for the development of affordable housing units in the City for developers.*

The Applicant had initially submitted the Project as an SB 35 project in 2021,²¹ but the City stalled this process utilizing AB 168 despite there being no evidence of on-site cultural resources and HCD providing Technical Assistance regarding how to conclude this process. See Exhibit “H” for HCD Technical Assistance to the City on this topic. While the Project is still eligible under SB 35, the City has failed to process the application, which is “locked” in the City's online planning permit application system.

²¹ See MA21351: <https://aca-prod.accela.com/JURUPA/Cap/CapDetail.aspx?Module=Planning&capID1=PLN21&capID2=00000&capID3=00713&agencyCode=JURUPA>

Unmet Housing Element Commitments

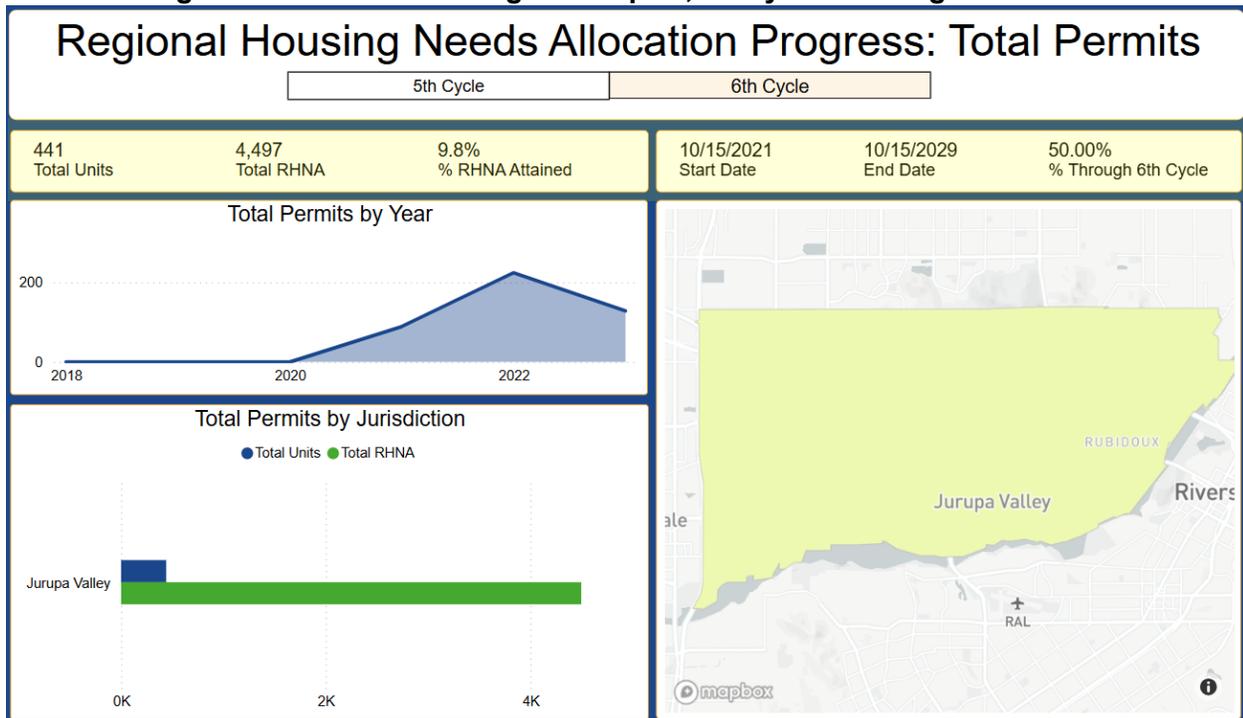
2.e RHNA Commitments

The City has committed to permitting 4,497 units, of which, 749 units are assigned for Lower Income households (HE Table 5.34). According to HCD’s Housing Element Implementation and Annual Progress Report dashboard,²² the City has only permitted 441 units, or 9.8%, of its RHNA targets, none of which have been deed-restricted for Lower Income households. Yet, the City asserts the following in its application to obtain a Prohousing Designation to HCD:

We have exceeded 150% of our Regional Housing Needs Allocation (RHNA) through targeted rezoning efforts, adopted an Inclusionary Housing Ordinance to promote affordability, and implemented policies to accelerate housing approvals, including a priority review process for affordable housing projects.²³

Since the City has only issued permits for 9.8% of its RHNA targets, its unclear how the City could have exceeded 150% of its RHNA targets except that perhaps the City has the zoning capacity for 150% of its RHNA targets. But, if the City continues to deny housing developments, it does not matter if the City’s zoning has the capacity for housing or not.

Figure 8. HCD Annual Progress Report, 6th Cycle Housing Element



²² HCD Annual Progress Report dashboard: <https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard>

²³ City of Jurupa Valley Prohousing Designation Application: <https://www.jurupavalley.org/DocumentCenter/View/3879/ProHousing-Application>

Unmet Housing Element Commitments

Failure to Approve Pipeline Projects

The City's assessment of its own RHNA targets is misleading because the City has included 1,126 units under Pipeline Projects credited toward its RHNA. Of those projects, only approximately 376 units have either obtained building permits or been constructed. For example, the City's Housing Element Table 5.36 purports to have 110 Moderate Income multi-family dwelling units as part of the Rexco development (MA21083). But, after a 2021 study session at the City's Planning Commission,²⁴ the Project was advised to undergo a redesign and is now being constructed as 66 single-family homes.

HE Table 5.36 purports the City has 220 units in the pipeline under Paradise Knolls Planning Area 5 (MA20211). This application was formally submitted in November 2021 under Case No. MA21231²⁵ and is listed as still in review under its 3rd submittal. HE Table 5.36 also purports to have 78 single-family homes pending approval under Case No. PAR1314. This project was formally submitted in 2021 (MA21285) and the City's online planning permit system reports this project is still in review under its 6th submittal.²⁶ HE Table 5.36 also includes 36 single-family homes as part of the Madone Collection, which was resubmitted utilizing State Density Bonus Law for 67 single-family homes and subsequently denied, litigated and settled with the developer to allow the housing development to proceed.

In conclusion, even if the City does have the zoning capacity for its RHNA targets, the City has made common practice of either reducing the density of or outright denying housing development projects. The proposed 80-unit Supportive Housing Project for Lower Income households is an opportunity for the City to start enacting the goals, objectives, policies and action items in its Housing Element to make progress toward its Housing Element commitments.

²⁴ Planning Commission Minutes, April 21, 2021:
<https://www.jurupavalley.org/AgendaCenter/ViewFile/Minutes/04212021-355>

²⁵ MA 21312: <https://aca-prod.accela.com/JURUPA/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=PLN21&capID2=0000&capID3=00630&agencyCode=JURUPA&IsToShowInspection=>

²⁶ See MA21285: <https://aca-prod.accela.com/JURUPA/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=PLN21&capID2=0000&capID3=00577&agencyCode=JURUPA&IsToShowInspection=>

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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April 24, 2025

Arleen Pruitt, Chair
Laura Shultz, Chair Pro Tem
Uriel de la Torre, Penny Newman, Christobal Rosales, Commissioners
City of Jurupa Valley Planning Commission

8930 Limonite Avenue
Jurupa Valley, CA 92509

Dear Arleen Pruitt, Laura Shultz, Uriel de la Torre, Penny Newman, and
Christobal Rosales:

RE: Jurupa Valley AB 2162 Camino Terrace – Notice of Potential Violation

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding compliance with AB 2162¹ for a proposed supportive housing project (Project) at the intersection of Limonite Avenue and Camino Real in the City of Jurupa Valley (City). Among other provisions, AB 2162 makes supportive housing a use by right if projects meet specified requirements. On February 13, 2025, the City issued a notice of decision denying the project, citing a lack of eligibility for AB 2162 due to the absence of onsite supportive housing and findings of specific, adverse impacts to public health and safety per the Housing Accountability Act (HAA),² including the lack of an accessible sidewalk across a street and inconsistent use classification. Ahead of the scheduled hearing on the appeal of the Project's denial, HCD hereby notifies the City that failing to grant the appeal would constitute a violation of state housing law.

Background

HCD understands that the proposed Project consists of 80 units affordable to low-income households (excluding a manager's unit), of which 25 units would be supportive housing intended for a target population that includes veterans who have experienced homelessness and who may have physical disabilities. The Project would be located on multiple parcels separated by Canyon Terrace; the residential units would be located on the southern parcels, while the onsite supportive services would be located on the northern parcel along with a daycare facility open to both residents and the public.

¹ Chapter 753, Statutes of 2018; Gov. Code, §§ 65583, subd. (c)(3), 65650 et seq.

² Gov. Code, § 65589.5.

Arleen Pruitt, Chair; Laura Shultz, Chair Pro Tem;
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Wakeland is proposing the Project using the City’s supportive housing ordinance,³ which references AB 2162 and the State Density Bonus Law (SDBL).⁴

Wakefield originally submitted its application for the Project on June 21, 2024. The City deemed the application complete on October 16, 2024. On November 15, 2024, the City issued the applicant a zoning compatibility letter⁵ identifying inconsistencies. The letter highlighted two issues that were referred to HCD for review. First, the City was uncertain whether supportive housing services could be considered “onsite” due to the site plan not showing a continuous Americans with Disabilities Act (ADA) connection between the parcels across Camino Terrace. Second, because the site’s zoning requires a site development permit for childcare centers, the City required the developer to seek an additional incentive or concession under the SDBL to allow the childcare use without the site development permit.

Because the applicant did not subsequently address these two issues raised by the City, the City denied the Project for these reasons and others laid out in the notice of decision. In denying the Project, the City claimed that the Project did not have onsite services because it “includes supportive services on a separate parcel that is located across the street from the 80 housing units” and “fails to provide adequate connectivity between the two parcels such that those residing in the housing units could have access to the services located on the other parcel.”⁶ The City further claimed a lack of compliance with City general policies that resulted in “specific, adverse impacts upon the public health and safety” under the HAA, including the aforementioned pedestrian access issue and the absence of a waiver for the childcare use. The City also claimed specific, adverse impacts from the configuration of parking spaces, unresolved items in the Project’s fire protection plan, excessive height in a retaining wall along a street, and lack of compliance with various objective design standards not addressed with SDBL incentives or waivers. The applicant subsequently appealed the denial to the City Council for a hearing scheduled for April 28, 2025.

HAA Findings

Government Code section 65589.5, subdivision (d)(2) specifies the written findings local governments must establish to disapprove a housing development project for very low-, low-, or moderate-income households when there is a specific, adverse impact. Given that the City cited the inconsistency with development standards as specific, adverse impacts that required project denial, the relevant question for the Project is:

³ Jurupa Valley Municipal Code Section 9.240.555.
⁴ Gov. Code, § 65915 et seq.
⁵ A zoning compatibility letter is the City’s method of communicating inconsistency items to an applicant. It is unrelated to an application completeness letter per the Permit Streamlining Act or a consistency determination pursuant to the Housing Accountability Act.
⁶ City of Jurupa Valley Notice of Decision for MA24164, February 15, 2025, page 10.

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Can inconsistency with development standards alone qualify as specific, adverse impacts that justify the denial of a housing development project for very low-, low-, or moderate-income households?

The answer is “no” for several reasons. First, the claimed specific, adverse impacts are not necessarily identified based on “written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.”⁷ For example, the City identifies non-compliance with standards such as landscaping and property walls as creating “specific, adverse impacts upon the public health and safety.”⁸ However, the City does not demonstrate that the standards are based on preexisting, written public health or safety standards instead of design standards for regulating aesthetics.

Similarly, the City cannot deny the Project based solely on findings of “[i]nconsistenc[ies] with the zoning ordinance or general plan land use designation.”⁹ For example, the City identifies non-compliance with off-street vehicle parking¹⁰ and wall height¹¹ standards as causing specific, adverse impacts. Such findings of inconsistencies with the City’s zoning ordinance are not in themselves sufficient grounds to deny the Project absent additional findings that the inconsistencies would create adverse impacts that have already been documented in “written public health and safety standards, policies, or conditions,” and that “there is no feasible method to satisfactorily mitigate or avoid” these impacts.¹²

Finally, the City does not demonstrate in its written findings that there is “no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low- and moderate-income households.”¹³ For example, for the Canyon Terrace pedestrian crossing, the City could condition its approval on improvements to the intersection that would render the crossing ADA accessible. Doing so would likely mitigate any potential health safety risks associated with the crossing.

Supportive Housing Site Configuration

Government Code section 65651, subdivision (a)(5) requires that supportive housing developments provide a certain amount of supportive services onsite. Because the site is bisected by a roadway, the City is concerned that the apparent absence of an ADA-

⁷ Gov. Code, § 65589.5, subd. (d)(2).

⁸ Jurupa Valley Notice of Decision, page 9.

⁹ Gov. Code, § 65589.5, subd. (d)(2)(A).

¹⁰ Jurupa Valley Municipal Code Section 9.240.120.

¹¹ Jurupa Valley Municipal Code Section 9.240.545.

¹² Gov. Code, § 65589.5, subd. (d)(2).

¹³ *Id.*

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accessible pedestrian path of travel between the two parcels may conflict with a provision of the law that requires that “at least 3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are limited to tenant use...”¹⁴ Therefore, the relevant question is:

Can a site that is bisected by a roadway be developed as a single permanent supportive housing development? If so, to what extent does the roadway dividing the site need to have pedestrian connectivity?

There is nothing in AB 2162 that would prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development. The 3-percent onsite supportive services requirement would be applied to the project overall and not to each constituent part of the project site.¹⁵ Where onsite supportive services are mentioned, they are referred to in the context of a singular “development.” However, the Government Code text does not preclude the City from conditioning its approval on intersection improvements as previously mentioned.

Supportive Housing Uses

Government Code section 65651, subdivision (a) declares that “[s]upportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses” if the proposed development satisfies the requirements of the statute. Therefore, the relevant question is:

Would a permanent supportive housing project which incorporates childcare use be entitled to the benefits of AB 2162? If not, could the childcare use be permitted via an alternative approval mechanism such as an SDBL incentive or concession?

The answer is “yes.” Permanent supportive housing can include a childcare use and maintain its eligibility under AB 2162. AB 2162, specifically Government Code section 65650, subdivision (b), references Health and Safety Code section 50675.2 in defining supportive housing. Specifically, Health and Safety Code section 50675.2, subdivision (h) defines supportive housing as being “linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live, and when possible, work in the community.” Adequate childcare is crucial for both child and parent residents of supportive housing who are trying to be integrated into the community and therefore qualifies for the

¹⁴ Gov. Code, § 65651, subd. (a)(5)(B).

¹⁵ Although not explicitly stated in AB 2162, other statutes that deal with ministerial approvals contain clauses that define parcels separated only by a street right-of-way as being one site. Examples include the Streamlined Ministerial Process (Gov. Code, § 65913.4, subd. (a)(2)(B)) and the Affordable Housing and High Road Jobs Act of 2022 (Gov. Code, § 65912.103, subd. (b)).

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benefits of by-right processing that AB 2162 provides to a supportive housing project in which a childcare use is included.

Other Potential Violations of State Law

The City should also consider whether denying the Project would violate other state laws.

Affirmatively Furthering Fair Housing (AFFH), Government Code sections 8899.50 and 65583

Government Code section 8899.50 requires the City to “tak[e] meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”¹⁶ Government Code section 65583 includes more specific obligations that require the City, for example, to affirmatively protect, promote, and remove constraints on housing for persons with low and very low incomes and persons with other protected characteristics, which, for the Project, would include veterans and persons with disabilities.¹⁷ Section 65583 also requires the City to use data, quantifiable analysis, metrics, and milestones to implement its AFFH duties.¹⁸

The City should ensure that its treatment of this Project is consistent with its AFFH duties.

Anti-Discrimination in Land Use Law, Government Code section 65008

Government Code section 65008 prohibits discrimination in land use and planning policies and practices. Section 65008 deems any action taken by a city or county to be null and void if such action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or any other land use in the state due to discrimination based on a protected characteristic.¹⁹ The law further provides that no city shall enact or administer its laws so as to “prohibit or discriminate against any residential development . . . because of the method of financing” or because “the development . . . is intended for occupancy” by persons with protected characteristics.²⁰ In addition, no city may impose requirements on a residential project intended for use by persons with protected characteristics, other than those generally imposed upon other residential uses.²¹

¹⁶ Gov. Code, § 8899.50, subs. (a)(1), (a)(2)(B).

¹⁷ Gov. Code, § 65583, subs. (a)(5), (a)(7), (b)(1), (c)(3), (c)(5), (c)(10)(A).

¹⁸ *Id.*

¹⁹ Gov. Code, § 65008, subd. (a).

²⁰ *Id.*, subd. (b).

²¹ *Id.*, subd. (d)(2)(A).

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Government Code section 65008 and its protections apply to the Project because it is intended for occupancy by, for example, persons with low and very low incomes, veterans, and persons with disabilities.²² The City should ensure that its treatment of this Project is consistent with its duties under section 65008. This includes considering whether denying the Project would have discriminatory effects, either by creating disparate impacts on persons with protected characteristics or by perpetuating segregated housing patterns. This also includes ensuring that the City’s treatment of the Project is not influenced in any manner by intentional discrimination.

Failure to Implement Housing Element Goals, Policies, and Programs, Government Code section 65585

Housing Element Law prohibits the City from taking an action or failing to take an action that is “inconsistent with an adopted housing element or [Government Code] Section 65583, including any failure to implement any program included in [its] housing element.”²³ The City should consider its treatment of the Project in light of its housing element’s goals, policies, and programs, including, for example:

- **H.E. 1.2. Affordable Housing.** Encourage affordable residential development on sites zoned to allow multi-family residential uses and identified in the vacant land inventory, the City will adopt development incentives and standards to encourage lot consolidation
- **H.E. 1.4. Housing Diversity.** Encourage the development of diverse housing types and housing densities to best meet the needs of the community.
- **H.E. 1.8. Housing for Homeless Persons and Those at Risk of Homelessness.** In cooperation with other cities and/or the County of Riverside, assist in the development of . . . permanent supportive housing
- **H.E. 1.9. Housing for All Special Needs Groups.** Ensure and encourage the availability of housing to all [s]pecial needs populations and income levels.
- **H.E. 3.3. Housing Opportunities for Seniors, Disabled Persons, Single Parent Households, Farmworkers, Veterans, Homeless and all other Special Needs Groups.** Encourage and, as the budget allows, help support programs and activities that promote affordable housing opportunities for seniors, disabled persons, single parent household[s], farm workers, homeless, veterans, and all other special needs groups.

²² *Id.*, subds. (a), (b), (d)(2)(A).

²³ Gov. Code, § 65585, subd. (i)(1)(A).

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- **H.E. 6.1. Taking Meaningful Action.** Take meaningful action to affirmatively further fair housing by implementing measures to improve housing mobility, provide new opportunities in higher opportunity areas, encourage place-based strategies for community revitalization, and discourage displacement.
- **Goal HE 2.1.9. Remove Government Constraints.** Evaluate the zoning ordinance, subdivision requirements, and other City regulations to remove government constraints to the maintenance, improvement, and development of housing, where appropriate and legally possible. . . .

Conclusion

HCD finds that (1) the City did not make the requisite findings required by the HAA in denying the project, (2) adjacent parcels can be considered part of the same site even if there is not a pedestrian connection (though a local government can condition approval on the installation of a connection), and (3) daycare facilities included in a qualifying supportive housing project should also benefit from the by-right processing AB 2162 requires. Failure to grant the appeal and approve the Project on these grounds would be a violation of the HAA and AB 2162. The City should also consider whether denying the Project would violate its AFFH duties, Government Code section 65008, and Housing Element Law.

Under Government Code section 65585, HCD must notify a local government when that local government takes actions that violate the HAA, AB 2162, and other laws that HCD enforces, and may notify the California Office of the Attorney General of these and other violations of state housing laws. If you have questions or need additional information, please contact David Ying at david.ying@hcd.ca.gov.

Sincerely,



David Zisser
Assistant Deputy Director
Local Government Relations and Accountability

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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March 14, 2025

Rob Butler, City Manager
City of Jurupa Valley
8930 Limonite Avenue
Jurupa Valley, CA 92509

**RE: City of Jurupa Valley 6th Cycle Housing Element Update Rezone
Requirements – Letter of Inquiry**

Dear Rob Butler:

The purpose of this letter is to inquire about the status of the City of Jurupa Valley's (City) 6th Cycle Housing Element implementation program related to sites to accommodate the Regional Housing Needs Allocation (RHNA) pursuant to Government Code section 65585, subdivision (i). The California Department of Housing and Community Development (HCD) sent the City a letter on April 21, 2022, finding the City's housing element in substantial compliance with Housing Element Law.¹ This was based on, among other reasons, the City's commitment to complete Action HE. 1.1.1 (General Plan and Zoning Amendments) to rezone adequate sites to satisfy its lower-income RHNA shortfall.

Rezoning Requirements

Pursuant to Government Code section 65583.4, subdivision (a), all rezoning actions must be completed three years and 120 days from the statutory deadline (October 15, 2021) if the local government adopted a sixth cycle housing element and HCD found the adopted element to be in substantial compliance within one year of the statutory deadline.

Consequences of Failure to Implement Action HE 1.1.1

Government Code section 65585, subdivision (i), grants HCD authority to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or Housing Element Law. This includes failure to implement program actions included in the housing element. Failure to implement rezone Action HE. 1.1.1 by the statutory deadline means the City's housing element will no longer substantially comply with Housing Element Law, and HCD may revoke its finding of substantial compliance.

¹ Gov. Code, § 65580 et seq.

Rob Butler, City Manager
Page 2

Various consequences may apply if the City does not have a housing element in compliance with Housing Element Law, including ineligibility or delay in receiving certain state funds, referral to the California Office of the Attorney General, court-imposed financial penalties, the loss of local land use authority to a court-appointed agent, and the application of the "builder's remedy."²

Conclusion

Housing elements are essential to developing a blueprint for growth and are a vital tool to address California's prolonged housing crisis. Accordingly, state law has established clear disincentives for local jurisdictions that fail to comply with Housing Element Law.

To ensure the City continues to meet the 6th cycle update requirements for a substantially compliant housing element, HCD requests that the City provide an update on the status and timeline of implementation of Action HE 1.1.1 by April 14, 2025, and submit any adopted rezones and accompanying resolutions to HCD for review.

HCD will consider any written response before taking further action authorized by Government Code section 65585, subdivision (i), including issuance of a Corrective Action Letter and revocation of HCD's finding of housing element compliance.

HCD looks forward to receiving your written response to this inquiry. If you have any questions or would like to discuss the content of this letter, please contact Reid Miller, Housing Policy Specialist, at reid.miller@hcd.ca.gov.

Sincerely,



Melinda Coy
Proactive Housing Accountability Chief

² Gov. Code, §§ 65585, subs. (j), (l)(1), (i); 65589.5, subd. (d)(6).



Apr 28, 2025

City of Jurupa Valley
8930 Limonite Avenue
Jurupa Valley, CA 92509

Re: Proposed Housing Development Project “Camino Terrace Apartments”

To: esoriano@jurupavalley.org

Cc: pthorson@rwglaw.com; vwasko@jurupavalley.org; rbutler@jurupavalley.org;
planninginfo@jurupavalley.org; jperez@jurupavalley.org;
rgonzalez@jurupavalley.org

Dear Jurupa Valley Planning Commission,

The California Housing Defense Fund (“CalHDF”) submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 80-unit, 100% affordable, supportive housing development project at the northeast corner of Camino Real and Limonite Avenue (APNs: 185-460-001, 185-470-001, 185-470-002). These laws include the Housing Accountability Act (“HAA”), the Density Bonus Law (“DBL”), binding caselaw from the California Court of Appeal, and Government Code section 65650 et seq.

Background

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subs. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible or reduce the project’s density unless, again, such written findings are made. (*Id.* at subd. (d).) As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA’s ambit, and it complies with local zoning code and the City’s general plan. The City must therefore approve the project unless it makes written findings regarding health and safety as mentioned above – which it cannot do since the preponderance of the evidence in the record does not support such findings. (*Ibid.*) Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA. (Gov. Code, § 65589.5, subd. (j)(3).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to tree spacing, parking lot shading, private open space, parking setback, pedestrian access, retaining wall height, unit sizes, laundry hook-ups, and parking, unless it makes written findings as required by Government Code, section 65915, subdivision (e)(1) that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact, or as required by Government Code, section 65915, subdivision (d)(1) that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

On February 13, 2025, the Community Development director issued a Notice of Decision denying Master Application No. 24164 (MA24164) and Site Development Permit No. 24074 (SDP24074). This was a violation of the HAA and the DBL.

Compliance with Government Code section 65651

In its on February 13, 2025 denial, the City found that the project did not comply with Government Code section 65651, subdivision (a)(5), which requires onsite supportive services, as there is a street separating the offices for the supportive staff from the residential buildings. In the City’s view, this is not “onsite.”

The City’s ad-hoc decision to redefine “onsite” in such a way as to deny the project is not objective. The HAA requires disapprovals to be based on objective criteria (Gov Code, § 65589.5, subd. (j)(1)), which “means involving no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official” (Gov Code, § 65589.5, subd. (h)(9)).

Given that the City code has no written definition of “onsite,” and certainly no definition that excludes services that are across the street internal to the development site, denying the project based on this novel definition is not objective.

It would not be challenging to find previous approvals by the City of development projects that included “onsite” community amenities, even though they may have been across an internal street, where the City did not object to such amenities not being “onsite” for all residents.

Site Development Permit for Childcare Facility

The City cites City Code Section 9.80.0202(A)(25) to justify disapproving the project, as this section of code requires a Site Development Permit for the childcare facility proposed as part of the project.

However, this section of City Code is preempted by Government Code section 65650 et seq. The entire point of this law is to encourage the development of supportive housing, which includes supportive services. The provision of onsite childcare is a service that directly supports the needs of the residents of the development. While Government Code section 65651, subdivision (a)(5)(B) requires that at least 3% of the total floor area be for supportive services that are exclusively for tenant use, this section of law does not state that floor area above and beyond the 3% floor must be exclusively for tenant use.

The City may wish to read Government Code section 65656, the legislative findings for the state supportive housing law at issue (emphasis added):

The Legislature finds and declares that, by adoption of Proposition 2 at the November 6, 2018, statewide general election, the **voters expressly approved of the development of permanent supportive housing** pursuant to the No Place Like Home Program (Part 3.9 (commencing with Section 5849.1) of Division 5 of the Welfare and Institutions Code). The Legislature further finds and declares that the **provision of adequate supportive housing** to help alleviate the severe shortage of housing opportunities for people experiencing homelessness in this state and of necessary services to the target population described in Section 50675.14 of the Health and Safety Code, and that ensuring the development of permanent supportive housing in accordance with programs such as the No Place Like Home Program (Part 3.9 (commencing with Section 5849.1) of Division 5 of the Welfare and Institutions Code) by **removing zoning barriers that would otherwise inhibit that development, are matters of statewide concern and are not municipal affairs** as that term is used in Section 5 of Article XI of the California Constitution. Therefore, this article applies to all cities, including charter cities.

The City is obviously attempting to thwart the intent of this law by requiring discretionary approval of an integral aspect of the supportive housing proposal.

Proposed Health and Safety Findings

Sidewalk Improvements

The City is proposing to deny the project using health and safety findings pursuant to Government Code, section 65589.5, subdivision (d)(2). This is a transparent attempt to bypass the requirements of the DBL

The resolution uses the project’s proposed concession to not construct off-site sidewalk improvements as a health and safety impact with which to make findings to deny the project and deny the proposed concession.

Government Code, section 65915, subdivision (d)(1)(B):

The concession or incentive would have a specific, adverse impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households.

Additionally, as can be seen in the above excerpts, the law requires that there must be no feasible way to mitigate these impacts. There is a feasible way to mitigate the impact - the City could pay to improve the sidewalk. In short, this is a transparent backdoor attempt to undermine the DBL.

State and Federal Law

Additionally, the City is proposing to deny the project pursuant to Government Code, section 65589.5, subdivision (d)(3), which allows cities to deny projects if their approval would violate state or federal law.

However, there is no violation of state or federal law in this case. The state and federal law cited in the resolution mandate accessibility within the site, not on public property.

Regarding the American with Disabilities Act, a matter normally reserved for the building permit phase, the City provides the following (emphasis added):

The ADA mandates that public facilities, including sidewalks, must be accessible to individuals with disabilities. The Project does not comply with a number of ADA regulations and standards. According to ADA Standards for Accessible Design Standards, Section 206.2.1, at least one accessible route must be provided **within the site to accessible facility entrances** from these site arrival points, where provided: (1) accessible parking and accessible passenger loading zones, (2) public streets and sidewalks, and (3) each public transportation stop.

Regarding state building code, a matter normally reserved for the building permit phase of the project, not the zoning entitlement phase, the City provides the following (emphasis added):

The Project also does not comply with the requirements set forth in California Building Code, Title 24 of the California Code of Regulations Section 1114B.1.2, which states that “when a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7, and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances, and between the building and the public way. . . At least one accessible route **within the boundary of the site** shall be provided from public transportation stops, accessible parking and accessible passenger loading zones, and public streets or sidewalks, to the accessible building entrance they serve.

As can be seen in the above excerpts from the proposed Planning Commission resolution for April 28, 2025, the City is proposing to deny a project for not providing sidewalks on City property, external to the project site, by citing state and federal law that regulates accessibility interior to a site.

The City Is Exposing Itself to Legal Liability

The Council should be aware that should the City persist in its denial of the project, and face a lawsuit, it will be liable for attorney’s fees and costs of suit pursuant to Government Code, section 65915, subdivisions (d)(3) and (e)(1). If the City is found to have violated the HAA in addition to wrongly denying requested waivers/concessions under the DBL, additional penalties apply. (See Gov. Code, § 65589.5, subd. (k)(1)(B).) The liability for violating state housing law can be severe. As an example, the City of Berkeley was recently [forced to pay](#) \$4 million after wrongfully denying a housing development project.

In addition to the provisions cited above, the HAA allows housing organizations like CalHDF to bring an enforcement suit. (Gov. Code, § 65589.5, subd. (k)(2).) If an enforcement lawsuit brought by a housing organization is successful, the locality must pay the organization’s attorney’s fees and costs. (*Ibid.*)

Of note, the HAA provides for a 5x multiple of fines if the local agency has acted in bad faith through its denial of project. Government Code section Gov. Code, § 65589.5, subdivision (l):

If the court finds that the local agency (1) acted in bad faith when it violated this section and (2) failed to carry out the court’s order or judgment within the time period prescribed by the court, the court, in addition to any other remedies provided by this section, shall multiply the fine determined pursuant to subparagraph (B) of paragraph (1) of subdivision (k) by a factor of five. If a court has previously found that the local agency violated this section within the same planning period, the court shall multiply the fines by an additional factor for each previous violation. For purposes of this section, “bad faith” includes, but is not limited to, an action or inaction that is frivolous, pretextual, intended to cause unnecessary delay, or entirely without merit.

This is relevant given the extraordinarily thin health and safety findings the City is proposing to make. And the City’s resistance to this project is especially shocking, as it will provide permanent housing for homeless veterans. After more than 20 years of the Global War on Terror, hundreds of thousands of veterans across the United States are suffering from post-traumatic stress and associated challenges. While it is terrible to see anyone live on the streets, it is particularly galling that we should have homeless veterans in the richest country in the U.S.



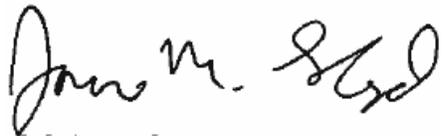
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New supportive housing such as this is a public benefit: this will provide affordable and supportive housing for veterans; it will mitigate the state’s homelessness crisis; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director

A handwritten signature in black ink, appearing to read "James M. Lloyd". The signature is written in a cursive style with a large initial "J" and "L".

James M. Lloyd
CalHDF Director of Planning and Investigations

**City of Jurupa Valley Traffic Impact Analysis Guidelines
August 2020**

A. City of Jurupa Valley Development Project Scoping Form

This scoping form shall be submitted to the City of Jurupa Valley to assist in identifying infrastructure improvements that may be required to support traffic from the proposed project.

Project Identification:

Case Number:	
Related Cases:	
SP No.	
EIR No.	
GPA No.	
CZ No.	
Project Name:	
Project Address:	
Project Opening Year:	
Project Description:	

	Consultant:	Developer:
Name:		
Address:		
Telephone:		
Fax/Email:		

Trip Generation Information:

Trip Generation Data Source: _____

Current General Plan Land Use: _____ Proposed General Plan Land Use: _____

Current Zoning: _____ Proposed Zoning: _____

(See attached Table 1 - Project Trip Generation Forecast)

	Existing Trip Generation			Proposed Trip Generation		
	In	Out	Total	In	Out	Total
AM Trips						
PM Trips						

692 ADT

Internal Trip Capture: Yes No (_____ % Trip Discount)

Pass-By Allowance: Yes No (_____ % Trip Discount)

(Daily/AM/PM) for Day Care

**City of Jurupa Valley Traffic Impact Analysis Guidelines
August 2020**

Potential Screening Checks

Is your project screened from specific analyses?

Is the project screened from LOS assessment? Yes No

LOS screening justification (see Pages 2-3 of the guidelines): _____

Is the project screened from VMT assessment? Yes No

VMT screening justification (see Pages 13-16 of the guidelines): _____

Level of Service Scoping

- Proposed Trip Distribution (Attach Graphic for Detailed Distribution):

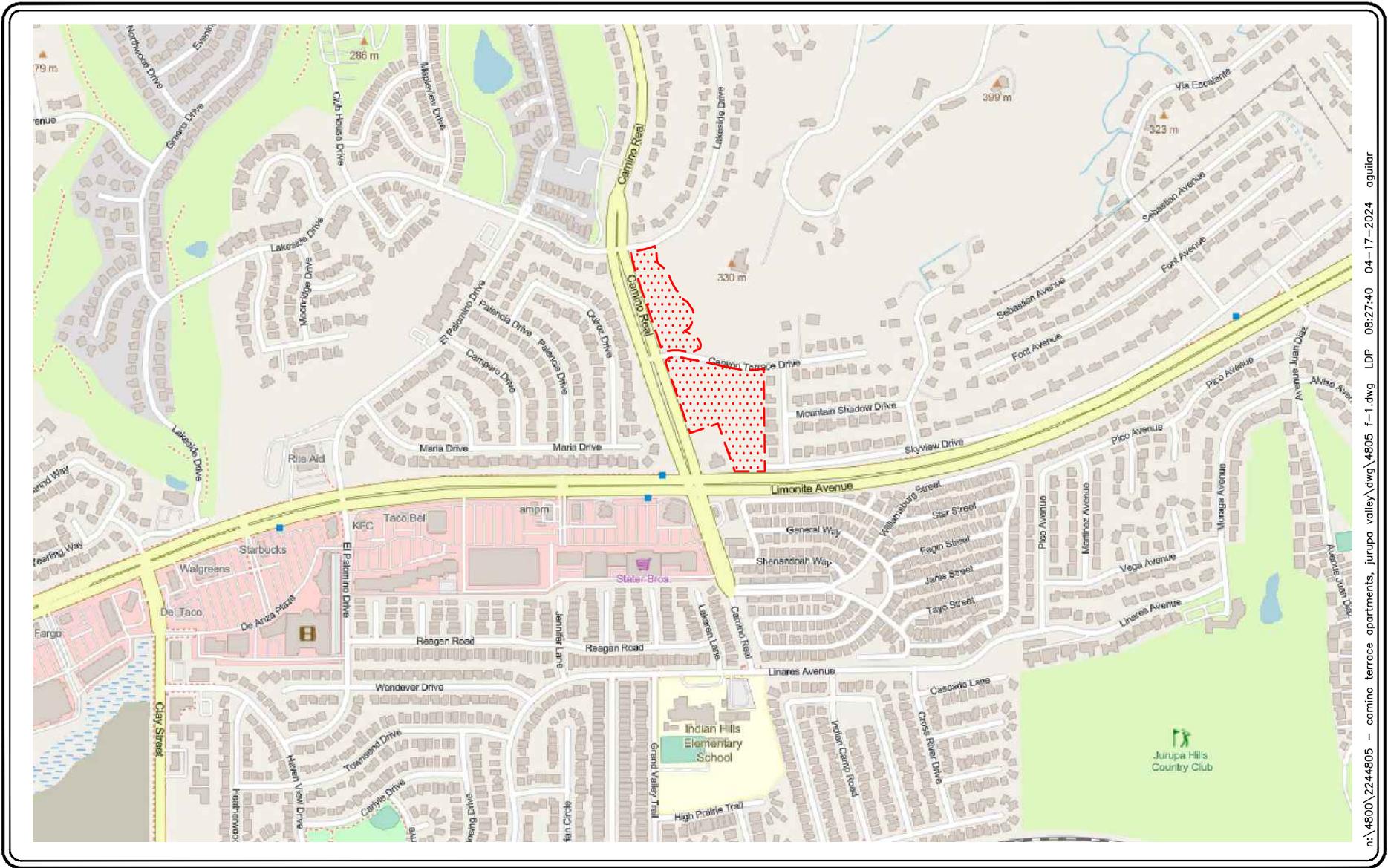
North	South	East	West
%	%	%	%

- Attach list of Approved and Pending Projects that need to be considered (provided by the Planning Department and adjacent agencies)
- Attach list of study intersections/roadway segments
- Attach site plan (See attached Figures 3A & 3B - Proposed Site Plan)
- Other specific items to be addressed:
 - Site access
 - On-site circulation
 - Parking
 - Consistency with Plans supporting Bikes/Peds/Transit
 - Other _____
- Date of Traffic Counts _____
- Attach proposed analysis scenarios (years plus proposed forecasting approach) (See attached Table 3)
- Attach proposed phasing approach (if the project is phased)

VMT Scoping

For projects that are not screened, identify the following:

- Travel Demand Forecasting Model Used _____
- Attach WRCOG Screening VMT Assessment output or describe why it is not appropriate for use
- Attach proposed Model Land Use Inputs and Assumed Conversion Factors (attach)



n:\4800\2244805 - camino terrace apartments, jurupa valley.dwg\4805 f-1.dwg LDP 08:27:40 04-17-2024 aguilar

SOURCE: OPEN STREETS

KEY

 = PROJECT SITE

FIGURE 1



VICINITY MAP
CAMINO TERRACE APARTMENTS & DAY CARE, JURUPA VALLEY



n:\4800\2244805 - camino terrace apartments, jurupa valley\dwg\4805 f-2.dwg LDP 06:28:39 04-17-2024 aguilera

SOURCE: GOOGLE

KEY

 = PROJECT SITE

FIGURE 2



EXISTING SITE AERIAL
 CAMINO TERRACE APARTMENTS & DAY CARE, JURUPA VALLEY



n:\4800\2244805 - camino terrace apartments, jurupa valley\dwg\4805 f-3a.dwg LDP 09-48.32 04-17-2024 agular

SOURCE: SB&O INC.

FIGURE 3A



PROPOSED SITE PLAN (APARTMENTS)
 CAMINO TERRACE APARTMENTS & DAY CARE, JURUPA VALLEY



n:\4800\2244805 - camino terrace apartments, jurupa valley.dwg\4805 f-3b.dwg LDP 09-49:33 04-17-2024 agular

SOURCE: SB&O INC.

FIGURE 3B



PROPOSED SITE PLAN (DAY CARE)
 CAMINO TERRACE APARTMENTS & DAY CARE, JURUPA VALLEY

TABLE 1
PROJECT TRAFFIC GENERATION RATES AND FORECAST¹
CAMINO TERRACE APARTMENTS AND DAY CARE, JURUPA VALLEY

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<u>Generation Factors:</u>							
▪ 223: Affordable Housing Income Limits (TE/DU)	4.81	29%	71%	0.36	59%	41%	0.46
▪ 565: Day Care Center (TE/Student)	4.09	53%	47%	0.78	47%	53%	0.79
<u>Proposed Project Generation Forecast:</u>							
▪ Camino Terrace Apartments (80 DU)	385	8	21	29	22	15	37
▪ Day Care Center (100 Students)	409	41	37	78	37	42	79
Pass-by Rates (Daily: 25%, AM: 35% PM: 44%) ²	<u>-102</u>	<u>-14</u>	<u>-13</u>	<u>-27</u>	<u>-16</u>	<u>-18</u>	<u>-34</u>
<i>Day Care Net Trip Generation</i>	307	27	24	51	21	24	45
Total Project Trip Generation	692	35	45	80	43	39	82

Notes:

- TE/DU = Trip ends per dwelling unit
- TE/Student = Trip ends per Day Care student

¹ Source: *Trip Generation, 11th Edition*, Institute of Transportation Engineers, (ITE) [Washington, D.C. (2021)].

² Source: Source: Daily and AM peak hour pass-by reductions conservatively assumed at 25% and 35%, respectively. 44% PM peak hour pass-by reduction based on *Trip Generation, 11th Edition*, Institute of Transportation Engineers (ITE), Washington, D.C. (2021) pass-by table for Day Care Center.

From: [Roberto Gonzalez](#)
To: [Jamie Poster](#); [Annette Tam Chyan](#); [Jim Ries](#)
Subject: Re: Supportive Housing Processing
Date: Friday, February 16, 2024 3:02:59 PM
Attachments: [Outlook-cid_e38ce5.png](#)

Hello All,

I just wanted to provide a follow-up from our meeting earlier this week. Please let me know if you need additional information:

Question Regarding R-3 Zone Section 9.80.020 and Sec. 9.240.555. - Supportive housing.

After our review, it has been determined that Sec. 9.240.555 Supportive housing is consistent with State law, and Sec. 980.020 of the R-3 zone is inconsistent. If the supportive housing project meet all the requirements outlined in Government Code Section 65651(a) and Sec. 9.240.555, the use is allowed by-right. The City will amend the code regarding the inconsistency separately.

Regarding Housing Element Text

We confirmed that we do not have a ministerial site development permit program. However, we are working on creating affordable housing incentives as part of our Housing Element program action.

Regarding the Question about the site being included in past HE Cycle Inventory

The project site appears to be included in the 5th cycle; however, it was not included in the 6th cycle. Therefore, this option would not be available as a basis to review the project as a by-right use, but according to State law and Sec. 9.240.555, supportive housing would be allowed by-right.

Regarding the Impact Mitigation Reports for Multi-family

The studies are mandated for multi-family projects comprising more than 24 dwelling units. The necessity for submitting reports is generally objective, as these reports are required for the review process. We understand that the discussions stemming from the report's findings may lead to broader discussions on necessary mitigation measures, which may be subjective. However, the City would adhere to the provisions outlined in the Housing Accountability Act (HAA).

Sincerely,



Rob Gonzalez, MURP, AICP | Senior Planner
CITY OF JURUPA VALLEY | T: 951.332.6464 ext. 149 | F: 951.332.6995
8930 Limonite Avenue | Jurupa Valley, CA 92509
rgonzalez@jurupavalley.org | jurupavalley.org
Connect with us on social media:
[Facebook](#) | [Instagram](#) | [Twitter](#)

From: Jamie Poster
Sent: Thursday, February 8, 2024 10:59 AM
To: Jamie Poster <jamie@craiglawson.com>; Roberto Gonzalez <rgonzalez@jurupavalley.org>; Annette Tam Chyan <ATam@jurupavalley.org>; Jim Ries <jim@craiglawson.com>

This is inaccurate as the site is listed in the 6th Cycle.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
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www.hcd.ca.gov



June 24, 2022

Jose Perez, Director
Community Development Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

RE: Camino Terrace Apartments – Letter of Technical Assistance

Dear Jose Perez:

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding the Camino Terrace Apartments (Project). HCD is aware of a recent determination by the City of Jurupa Valley (City) that the Project does not qualify for the Streamlined Ministerial Approval Process created by Senate Bill (SB) 35 (Chapter 366, Statutes of 2017) and codified in Government Code section 65913.4. The purpose of this letter is to provide technical assistance related to the Streamlined Ministerial Approval Process. HCD recognizes the challenge of interpreting ever-changing housing and land-use laws and appreciates the opportunity to provide technical assistance that may lead to better housing outcomes for California, as well as the City.

HCD's Understanding of the Project

HCD understands the Project is proposed to consist of 80 units with a mix of 20 one-bedroom units, 38 two-bedroom units and 22 three-bedroom units. The affordability levels will be between 30 percent and 60 percent of area median income (AMI) with an average of approximately 50 percent of AMI. To comply with the requirements of the California Debt Limit Allocation Committee (CDLAC) program and Multifamily Housing Program (MHP), most of the units will be at 30 percent of AMI. The Project will incorporate a community building with indoor common area spaces for the property management company and spaces for resident services and social interaction. The Project will also have appropriate outdoor common area spaces for passive and active recreation. An application under the Streamlined Ministerial Approval Process (SB 35 Application) was submitted for the Project on February 18, 2022.

Statutory Exclusion of Sites within a Very High Fire Hazard Severity Zone

Government Code section 65913.4, subdivision (a), is broken into paragraphs that describe the eligibility requirements for a project to qualify for Streamlined Ministerial Approval Processing. Paragraph (6) enumerates a list of site characteristics that would exclude a site from eligibility from Streamlined Ministerial Approval Processing, and subparagraph (D) identifies the exclusion based on location in a "very high fire hazard severity zone" (VHFHSZ). The exact language is:

Jose Perez, Director

Page 2

Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within a high or very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code. **This subparagraph does not apply to sites excluded from the specified hazard zones by a local agency, pursuant to subdivision (b) of Section 51179, or sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development.** (Gov. Code, § 65913.4, subd. (a)(6)(D); emphasis added.)

HCD understands the City determined the Project did not qualify for the Streamlined Ministerial Approval Process based on its location in a VHFHSZ. However, subparagraph (D) does not apply to “sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development.”

Applicable Building Standards and State Fire Mitigation Measures

There are existing building standards and state fire mitigation measures applicable to this development. In consultation with the California Department of Forestry and Fire Protection (CAL FIRE), HCD has confirmed that this project must conform with standards set forth in the Chapter 7A of the California Building Code (CBC), Chapter 49 of the California Fire Code (CFC), and the Minimum Fire Safe Regulations in the Public Resources Code Section 4290 (14 CCR 1270 et seq.). These codes have all been updated since the passage of SB 35 in 2017 to establish and/or strengthen development standards that govern residential development within Fire Hazard Severity Zones and Wildland-Urban Interface Fire Areas. Both CBC Chapter 7A and CFC Chapter 49 require compliance with the requirements for defensible space and building in wildfire prone areas of Government Code sections 51175 through 51189.

Given the foregoing, the Project’s location in a VHFHSZ does not preclude the Project from eligibility for Streamlined Ministerial Approval Processing. Additionally, HCD is aware that a Fire Protection Plan has been prepared for the Project and will be submitted to the Riverside County Fire Department for review and approval to further ensure the Project meets all construction and infrastructure requirements resulting from a tailored fire risk assessment.

HCD appreciates the opportunity to provide information regarding the eligibility of the Camino Terrace Apartments under Government Code section 65913.4. Please feel free to contact Alex Contreras, at alex.contreras@hcd.ca.gov, with any questions.

Sincerely,



Shannan West
Housing Accountability Unit Chief

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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December 23, 2022

Joe Perez, Director
Community Development Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

RE: Camino Terrace Apartments – Letter of Technical Assistance

Dear Joe Perez:

The purpose of this letter is for the California Department Housing and Community Development (HCD) to urge the City of Jurupa Valley (City) to process the Camino Terrace Apartments (Project) under the Streamlined Ministerial Approval Process created by Senate Bill (SB) 35 (Chapter 366, Statutes of 2017) and codified in Government Code section 65913.4 and to provide technical assistance related to the City's evaluation of the Project's eligibility for this type of processing. Below is background on the Project and the current status as HCD understands it.

Background

On June 23, 2022, HCD sent a letter of technical assistance to the City regarding the Project, which as proposed consists of 80 affordable housing units. The letter provided technical assistance related to the Streamlined Ministerial Approval Process. The letter states the Project's location in a Very High Fire Hazard Severity Zone (VHFHSZ) does not preclude the Project from eligibility for Streamlined Ministerial Approval Process.

On July 19, 2022, HCD received a letter from the City in response to HCD's technical assistance letter. The City disagreed with HCD's technical assistance in the June 23, 2022, letter. In addition to the Project's location in the VHFHSZ, the City determined that the Project did not qualify for the Streamlined Ministerial Approval Process based on the potential to disturb the cultural resources of the Rincon Band of Luiseno Indians (Tribe). The Tribe submitted to the City a letter stating that "the Tribe believes potential exists to disturb surface and subsurface cultural resources throughout the duration of the project." The Tribe's letter requested a cultural resources survey including an archaeological record search to identify any potential impacts to cultural resources.

In October 2022, the Project applicant provided to the Tribe the requested cultural resources survey including an archaeological record search to identify any potential

Joe Perez, Director
Page 2

impacts to cultural resources. HCD understands the Tribe has reviewed the submitted materials and indicated via email, dated November 30, 2022, that the Tribe has “no further questions at this time and can conclude consultation.”¹

Streamlined Ministerial Approval Process Eligibility

HCD understands the City previously denied the applicant’s request to utilize the Streamlined Ministerial Approval Process for two key reasons: 1.) Location of the project in a VHFHSZ, and 2.) A request from the Rincon Band of Luiseno Indians to provide a cultural resources survey including an archaeological record search to identify any potential impacts to cultural resources. HCD asserts these matters have been resolved.

Project’s Location in a VHFHSZ

As stated in HCD’s Letter of Technical Assistance, dated June 24, 2022, the Project’s location in a VHFHSZ does not preclude the Project from eligibility for Streamlined Ministerial Approval Processing. HCD’s position has not changed, and HCD stands by this technical assistance. The Project’s location should not preclude the City from processing this Project under the Streamlined Ministerial Approval Process.

Tribal Scoping Consultation

HCD understands the Project applicant has completed the requested cultural resources survey including an archaeological record search as part of the National Environmental Policy Act (NEPA)² and submitted it to the Tribe for its consideration. Based on the email correspondence sent from the Tribe to the County of Riverside and the Project applicant, it appears the Tribe has no further questions and is ready to conclude consultation. Per statute, “a local government may accept an application for the streamlined, ministerial approval process if... the parties to a scoping consultation pursuant to this subdivision find that no potential tribal cultural resource will be affected by the proposed development.” (Gov. Code, § 65913.4, subd. (b)(3)(C)). With this matter apparently resolved, the City should verify with the Tribe that the consultation is concluded. If the Tribe confirms no further tribal consultation is required, the City should process this Project under the Streamlined Ministerial Approval Process.

Conclusion

To reiterate, the Project’s location in a VHFHSZ does not preclude the Project from eligibility for Streamlined Ministerial Approval Processing, and, as the Tribe has no

¹ Attachment 1 to this letter is a copy of this email.

² The Project is subject to NEPA because of its federal funding source.

Joe Perez, Director
Page 3

further objections, the City must conclude the tribal consultation and process the Project under the Streamlined Ministerial Approval Process.

HCD appreciates the opportunity to provide information regarding the eligibility of the Camino Terrace Apartments for streamlined review under Government Code section 65913.4 and welcomes any further opportunities to assist with a discussion on next steps. Please feel free to contact Fidel Herrera, at fidel.herrera@hcd.ca.gov, with any questions.

Sincerely,

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

Shannan West
Housing Accountability Unit Chief

Enclosure

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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www.hcd.ca.gov



April 18, 2023

Joe Perez, Director
Community Development Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

RE: Camino Terrace Apartments – Letter of Technical Assistance

Dear Joe Perez:

The California Department Housing and Community Development (HCD) received a letter from the City of Jurupa Valley (City) dated February 10, 2023, in response to HCD's technical assistance regarding the Camino Terrace Apartments (Project), a proposed multi-family development consisting of 80 affordable housing units. The purpose of this letter is to recap the discussion between HCD and the City at the ensuing March 2, 2023 meeting and to further provide technical assistance related to the implementation provisions of the tribal scoping consultation under the Streamlined Ministerial Approval Process created by Senate Bill (SB) 35 (Chapter 366, Statutes of 2017) and codified in Government Code section 65913.4.

Background

On June 24, 2022, HCD sent a letter of technical assistance to the City regarding the Project. On July 19, 2022, HCD received a letter from the City in response to HCD's technical assistance letter dated June 24, 2022. The City disagreed with HCD's technical assistance letter. In addition to the Project's location in the Very High Fire Hazard Severity Zone (VHFHSZ), the City determined that the Project did not qualify for the Streamlined Ministerial Approval Process based on the potential to disturb the cultural resources of the Rincon Band of Luiseno Indians (Rincon Band). In addition, on August 4, 2022, the City provided a project timeline with additional information regarding the Project to HCD.

On December 23, 2022, HCD sent a second letter of technical assistance to the City regarding the Project. The letter provided technical assistance related to the City's evaluation of the Project's eligibility under the Streamlined Ministerial Approval Process. The letter states the Project's location in a VHFHSZ does not preclude the Project from eligibility for Streamlined Ministerial Approval Process and that, based on an email sent to the County from the Rincon Band, the tribe has "no further questions at this time and

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can conclude consultation.” However, HCD asked the City to verify with the Rincon Band whether the consultation was concluded.

On February 10, 2023, HCD received the City’s response to HCD’s technical assistance letter dated December 23, 2022. The City had contacted the Rincon Band to confirm whether consultation was concluded. It appears that a misunderstanding led the Rincon Band’s Cultural Resources Manager, Cheryl Madrigal, to mistakenly believe that she had been corresponding with the City and not the County. According to the City, Cheryl Madrigal reiterated the conclusion of her June 22, 2022 letter, that “[t]he Tribe believes potential exists to disturb surface and subsurface cultural resources throughout the duration of the project.” In addition, it appears the City received correspondence from a second tribe, the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno Band), that states “there will be a potential to disturb tribal cultural resources that still exists as a result of the Camino Terrace Apartments.”

On March 2, 2023, HCD met with City representatives regarding the response letter sent by the City. HCD explained the tribal consultation process and responsibility of the City. Below are the statutory requirements for the tribal scoping consultation and the roles of each party.

Tribal scoping consultation and the defined roles of each party

AB 168 (Chapter 166, Statutes of 2020 and codified in Gov. Code, §§ 65400, 65913.4, and 65941.1) created a process for tribal scoping consultation for housing development proposals seeking review under the Streamlined Ministerial Approval Process. The roles and responsibilities are outlined below:

- **Developer Responsibility:** Before submitting an application for the Streamlined Ministerial Approval Process, developers must submit a notice of intent to submit an application to a local government (Gov. Code, § 65913.4, subd. (b)(1)(A)(i)).
- **Local Government Responsibility:** Within 30 calendar days of receiving the developer’s preliminary application, the local government must provide formal notice to each Tribe traditionally and culturally affiliated with the geographic area of the project site (Gov. Code, § 65913.4, subd. (b)(1)(A)(iii)(I)). The formal notice must include the location and a description of the proposed development and an invitation to engage in scoping consultation (Gov. Code, § 65913.4, subd. (b)(1)(A)(iii)(I)(ia-ic)).
 - The local government shall contact the Native American Heritage Commission (NAHC) for assistance in identifying any California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed development. (Gov. Code, § 65913.4, subd. (b)(1)(A)(ii)).
- **Tribal Responsibility:** Each Tribe that receives this notice has 30 calendar days to accept the invitation to engage in consultation (Gov. Code, § 65913.4, subd. (b)(1)(A)(iii)(II)).

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- **Local Government Responsibility:** The local government must initiate scoping consultation within 30 calendar days of a Tribe's acceptance of the invitation to engage in scoping consultation (Gov. Code, § 65913.4, subd. (b)(1)(A)(iii)(III)).

It appears the City denied the applicant's request to utilize the Streamlined Ministerial Approval Process for the Project in part because the City received a letter from the Rincon Band stating that "the Tribe believes potential exists to disturb surface and subsurface cultural resources throughout the duration of the project." However, it is not clear to HCD the extent to which the City is implementing its responsibility under Government Code section 65913.4, subdivision (b)(1)(A). Based on the meeting with City staff on March 2, 2023, it appears that the City is failing to meet its statutory responsibility to engage in a tribal scoping consultation. Tribal scoping consultation must be between the City and the Tribe, and it is the City's role to lead the consultation to conclusion. If the City does not engage in tribal consultation, the City is not fulfilling the role of implementing the tribal scoping consultation under the Streamlined Ministerial Approval Process.

Simply receiving a letter from a tribe that indicates potential disturbance of cultural resources does not conclude a tribal consultation. A tribal scoping consultation concludes if either 1) the parties to the scoping consultation (i.e., the Local Government and the Tribe) document an enforceable agreement concerning methods, measures, and conditions to avoid or address potential impacts to tribal cultural resources that are or may be present (Gov. Code, § 65913.4, subd. (b)(2)(D)(i)); or 2) one or more parties to the consultation, acting in good faith and after a reasonable effort, conclude that a mutual agreement cannot be achieved (Gov. Code, § 65913.4, subd. (b)(2)(D)(ii)).

The Rincon Band requested a cultural resources survey, including an archaeological record search, to identify any potential impacts to cultural resources. Despite the misunderstanding over the proper parties to the communication, when the study was provided, the Rincon Band seemed to indicate, via email, it was ready to conclude consultation.

Further, during the March 2, 2023 meeting, the City indicated that it had recirculated the proposed Project to additional tribes, including the Gabrieleno Band, when the applicant applied for funding in the summer of 2022. It appears the Gabrieleno Band had already been notified of the Project in January 2022 among the other tribes notified at the time the applicant submitted its intent to file an SB 35 application. It is further curious to HCD why the City did not communicate to HCD nor the Applicant prior to its February 10, 2023 letter to HCD that the Gabrieleno Band had raised concerns about the Project.

As the City acknowledged in the March 2, 2023 meeting, this Project remains subject to the National Environmental Policy Act (NEPA) because of its funding source, and there will be continued opportunities for both the Rincon Band and the Gabrieleno Band to engage with this Project. Through the NEPA process, the Tribes may request conditions of approval on the Project, including common requests such as on-site monitoring of

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Earth disturbance. However, it should be noted for future reference that while this is true for this Project, an SB 35 project that is not subject to NEPA could use the SB 35 tribal consultation to document an enforceable agreement to avoid or address potential impacts to tribal cultural resources, and it is the City's role to facilitate the documentation during the SB 35 tribal consultation.

Conclusion

HCD expects the City to meet its statutory obligation to engage in consultation with the Rincon Band of Luiseno Indians and the Gabrieleno Band of Mission Indians – Kizh Nation. This is an act that only the City can perform. By May 2, 2023, please provide a specific plan and timeline for engaging both tribes as required by Government Code section 65913.4.

For further reference, attached is a document prepared by the Governor's Office of Planning and Research (OPR) regarding AB 168: Tribal Scoping Consultation Requirements for Projects Seeking Review Under the Streamlined Ministerial Approval Process.¹

HCD appreciates the opportunity to provide information regarding the tribal consultation process under SB 35. If you have questions or need additional information, please contact Fidel Herrera, at fidel.herrera@hcd.ca.gov with any questions.

Sincerely,



Shannan West
Housing Accountability Unit Chief

¹ Also available on OPR's website: https://opr.ca.gov/ceqa/docs/20201202-AB_168_Advisory_FINAL.pdf



AB 168: Tribal Scoping Consultation Requirements for Projects Seeking Review Under the Streamlined Ministerial Approval Process (SB 35)

AB 168 (Aguilar-Curry, 2020) created a process for tribal scoping consultation (“consultation”) for housing development proposals seeking review under the streamlined ministerial approval process created by SB 35 (Wiener, 2017). Developers are now required to submit a preliminary application with key project details (found in Government Code §65913.4(b)(1)(A)) and engage in tribal scoping consultation that potentially influences the project’s eligibility for ministerial approval.

This document provides an overview of this new process pursuant to AB 168 and answers some common questions related to this new law. This document specifically focuses on the scoping consultation requirement related to SB 35’s streamlined ministerial approval process and not consultation requirements that may be required by other laws unless otherwise noted.

This document provides guidance only and should not be construed as legal advice. OPR provides this technical advisory as a resource for the public to use at their discretion. OPR is not enforcing or attempting to enforce any part of the recommendations or information contained herein.

When does AB 168 take effect?

Immediately. AB 168 contained an urgency clause, which means that the bill took effect on **September 25, 2020**, when the Governor signed the bill. This law does not apply to any projects that obtained ministerial approval under SB 35 by the local government prior to this date (Government Code §65913.4(b)(8)).

The Governor’s Office of Planning and Research (OPR) advises that projects with pending applications under review should engage in this tribal consultation to ensure compliance with the requirements of AB 168.

What information must be included in a preliminary application?

Before submitting an application for SB 35 approval, development proponents must now submit a notice of intent to submit an application, which includes a preliminary application. The preliminary application and its requirements are described in existing statute (Government Code §65941.1); it is also the same preliminary application referenced in SB 330 (Statutes of 2019).

The California Department of Housing and Community Development (HCD) has developed a standardized form that applicants for housing development projects may use for the purpose of satisfying the requirements for submittal of a preliminary application if a local agency has not developed its own application form. The form and more information on the SB 330 preliminary application can be found at <https://www.hcd.ca.gov/community-development/accountability-enforcement/statutory-determinations.shtml>

A preliminary application must include all of the following information:

1. The project’s location, including the parcel number, a legal description, and address, as applicable
2. The existing uses of the site and the identification of major physical alterations to the property
3. A site plan showing the location of the property; as well as the massing, height, approximate square footage, and elevations showing design, color, and material of each building to be occupied
4. The proposed land uses by number of units and square feet of residential and nonresidential development using the applicable categories in the applicable zoning ordinance
5. The proposed number of parking spaces
6. Any proposed point sources of air or water pollutants

7. Any species of special concern known to occur on the property
8. Whether a portion of the property is located within any of the following:
 - a. A very high wildfire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Government Code Section 51178
 - b. Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993)
 - c. A hazardous waste site listed pursuant to Government Code Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Health and Safety Code Section 25356
 - d. A special flood hazard area subject to inundation by the 1 percent annual chance flood (100-year flood) as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency
 - e. A delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2
 - f. A stream or other resource that may be subject to a streambed alteration agreement pursuant to Chapter 6 (commencing with Section 1600) of Division 2 of the Fish and Game Code
9. Any historic or cultural resources known to exist on the property
10. The number of proposed below market rate units and their affordability levels
11. The number of bonus units and any incentives, concessions, waivers, or parking reductions pursuant to Density Bonus Law (Government Code Section 65915)
12. Whether any approvals under the Subdivision Map Act (Division 2 of Title 7 (commencing with Section 66410) of the Government Code), including, but not limited to, a parcel map, tentative map, or condominium map, are being requested
13. The applicant's contact information, and, if the applicant does not own the property, the property owner's consent to submit the application

14. For a housing development proposed to be located within the coastal zone, whether any portion of the property contains any of the following:
 - a. Wetlands, as defined by subdivision (b) of Section 13577 of Title 14 of the California Code of Regulations
 - b. Environmentally sensitive habitat areas, as defined by Public Resources Code Section 13577
 - c. A tsunami run-up zone
 - d. Use of the site for public access to or along the coast
15. The number of existing residential units on the project site that will be demolished and whether each unit is occupied or unoccupied
16. A site map showing a stream or other resource that may be subject to a streambed alteration agreement pursuant to Chapter 6 (commencing with Section 1600) of Division 2 of the Fish and Game Code and an aerial site photograph showing existing site conditions of environmental site features that would be subject to regulations by a public agency, including creeks and wetlands
17. The location of any recorded public easement, such as easements for storm drains, water lines, and other public rights of way

How are Tribes identified for scoping consultation?

Upon receipt of a development proponent's preliminary application, the local government must "engage in ... consultation regarding the proposed development with any California Native American Tribe that is traditionally and culturally affiliated with the geographic area, as described in Section 21080.3.1 of the Public Resources Code" and "contact the Native American Heritage Commission for assistance in identifying any California Native American Tribe" (Government Code §65913.4(b)(1)(A)(ii)).

What is the timeline for consultation?

The statute adopts a 30-30-30 timeline. Within **30 calendar days** of receiving the developer's preliminary application, the local government must provide formal notice for each Tribe traditionally and culturally affiliated with the geographic area of the project site (Government Code §65913.4(b)(1)(A)(ii)). The formal notice must include the location and a description of the proposed development, and an invitation to engage in scoping consultation (Government Code §65913.4(b)(1)(A)(iii)(I)(ia-ic)).

Each Tribe that receives this notice has **30 calendar days** to accept the invitation to engage in consultation (Government Code §65913.4(b)(1)(A)(iii)(II)).

The local government must initiate consultation within **30 calendar days** of a Tribe's acceptance of the invitation to engage in consultation (Government Code §65913.4(b)(1)(A)(iii)(III)).

Who participates in the consultation?

The local government and any California Native American Tribe that is traditionally or culturally affiliated with the geographic area of the project site may participate in the consultation. In cases where more than one Tribe participates in consultation, the local government must grant separate consultation with a Tribe if individual consultation is requested (Government Code §65913.4(b)(1)(C)).

The development proponent and its consultants may participate in consultation if they agree to respect the principles established in AB 168, engage in good faith, and the Tribe approves of the proponent's participation. **The Tribe may revoke this approval at any time during the consultation process** (Government Code §65913.4(b)(1)(C)).

AB 168 requires that consultation must recognize that California Native American Tribes traditionally and culturally affiliated with a geographic area have knowledge and expertise concerning the resources at issue, and shall take into account the cultural significance of the resource to the Tribe (Government Code §65913.4(b)(1)(B)).

What confidentiality requirements apply to the consultation process?

Consultation must comply with the confidentiality requirements established in Government Code Section 6254(r), Government Code Section 6254.10, Public Resources Code Section 21082.3(c), and California Code of Regulations, Title 14, Section 15120(d). Additionally, the Tribe may adopt any additional confidentiality requirements applicable to the consultation (Government Code §65913.4(b)(1)(D)).

Does the California Environmental Quality Act (CEQA) apply to the consultation process?

No, the tribal consultation required pursuant to AB 168 is not considered a project under CEQA (Government Code §65913.4(b)(1)(E)).

When does tribal consultation conclude?

Tribal consultation concludes either 1) upon documentation of an enforceable agreement regarding the treatment of tribal resources at the project site (Government Code §65913.4(b)(2)(D)(i)), or 2) one or more parties to the consultation, **acting in good faith and after a reasonable effort**, conclude that a mutual agreement cannot be achieved (Government Code §65913.4(b)(2)(D)(ii)).

What are the potential outcomes of the tribal consultation?

If the parties participating in tribal consultation determine that there is no potential impact to tribal cultural resources resulting from the project, then the development proponent may submit an application for ministerial approval pursuant to SB 35 (Government Code §65913.4(b)(2)(A)).

If the tribal consultation identifies a potential impact to tribal cultural resources resulting from the project, then the parties must document an enforceable agreement regarding the methods, measures, and conditions for treatment of tribal cultural resources. **This agreement must be a condition of approval** for the project application for SB 35 approval (Government Code §65913.4(b)(2)(B)).

If the parties are unable to reach an enforceable agreement regarding treatment of tribal cultural resources that may be present on the project site, then the development proponent is ineligible for ministerial approval under SB 35 (Government Code §65913.4(b)(2)(C)).

What is now required for a project to qualify for SB 35 ministerial approval?

A project is **eligible** for the ministerial approval established under SB 35 if **any** of the following conditions apply:

1. A Tribe that received notice of the developer's submission of a pre-application did not respond to the invitation to engage in consultation within 30 days (Government Code §65913.4(b)(3)(A));

2. A Tribe accepted an invitation to engage in tribal consultation but failed to engage after repeated attempts by the local government to initiate consultation (Government Code §65913.4(b)(3)(B));
3. The consultation concluded that there is no potential harm to tribal cultural resources resulting from the project (Government Code §65913.4(b)(3)(C)); OR
4. The consultation identified potential impacts to tribal cultural resources, and the parties committed to a documented, enforceable agreement regarding the treatment of potential resources (Government Code §65913.4(b)(3)(D))

Pursuant to AB 168, what might disqualify a project from ministerial approval under SB 35?

A project would be **ineligible** for ministerial approval pursuant to SB 35 if **any** of the following conditions apply:

1. The project site contains a tribal cultural resource that is listed on a national, tribal, state, or local historic register (Government Code §65913.4(b)(4)(A));
2. The parties to scoping consultation do not agree on whether the project will impact tribal cultural resources (Government Code §65913.4(b)(4)(B)); OR
3. A potential tribal cultural resource would be affected by the proposed project, and the parties to scoping consultation were unable to document an enforceable agreement regarding the treatment of potential tribal resources (Government Code §65913.4(b)(4)(C))

What documentation is required upon conclusion of the tribal consultation?

If the consultation concludes that the project would not affect potential tribal cultural resources, **no further documentation is required** and the development proponent may proceed with submission of its application for ministerial approval under SB 35 (Government Code §65913.4(b)(2)(A)).

If the consultation results in documentation of an enforceable agreement regarding the treatment of potential tribal resources, that **agreement must be attached** to the local government's approval of the application for SB 35 ministerial approval (Government Code §65913.4(b)(20)(B)).

If the consultation results in disqualification of the project from SB 35's streamlined ministerial approval process, the **local government must provide written documentation** of the fact, with an explanation for the project's ineligibility, to the development proponent and the Tribe or Tribes participating in the consultation (Government Code §65913.4(b)(5)(A)). The documentation provided to the development proponent must also include information on how to seek a conditional use permit or other discretionary approval of the project from the local government (Government Code §65913.4(b)(5)(B)).

What happens if the project changes after the conclusion of tribal consultation?

If the development or environmental setting substantially changes after the consultation, the local government must notify the Tribe of the change and engage in a **subsequent consultation if requested** by the Tribe or Tribes (Government Code §65913.4(b)(2)(E)).

While the bill does not specify a timeline for this subsequent notification and consultation, OPR recommends adhering to the 30-30-30 timeline required for the initial consultation.

For the purposes of this consultation, OPR advises that a project or environmental setting may "substantially change" if 1) those changes will require major revisions to the environmental impact report, or 2) if new information that was not available or could not have been known during preparation of the environmental impact report becomes available (see Public Resources Code §21166).

ATTACHMENT NO. 5

Project Review Correspondences



November 15, 2024

Craig Lawson & Co., LLC
C/O Jamie Poster, AICP
3221 Hutchison Avenue, Suite D
Los Angeles, CA 90034

RE: MA24164 – ZONING COMPATIBILITY LETTER - DEVELOPMENT OF AN 15.53-ACRE VACANT SITE WITH A NEW 80-UNIT SUPPORTIVE HOUSING DEVELOPMENT, ACCESSORY RESIDENTIAL SUPPORTIVE SERVICES, A CHILD DAYCARE FACILITY, SURFACE PARKING AND LANDSCAPE IMPROVEMENTS.

Dear Jamie Poster,

This document provides a consistency analysis of MA24164 project plans. Please review the following items and provide responses or plan corrections.

Density Bonus Summary

The project was assessed under Density Bonus Law. For a project with 25 supportive housing units and 51 affordable housing units (all for low-income households, except for a manager's unit), your project is considered 100% affordable under California's Density Bonus Law (Gov. Code Section 65915). Here's a summary of the waivers, incentives, and concessions available:

- **Section 65915(d)(2)(D)** - specifically provides that 100% affordable projects are eligible for five **incentives or concessions** to reduce development costs, such as parking reductions, increased building height, or reduced setbacks.
- **Section 65915(e)** - allows developers to request **waivers** from development standards that would otherwise physically preclude the project from being built at the permitted density and with the requested incentives/concessions. This provision applies to requirements such as height limits, setbacks, or lot coverage that may impede the feasibility of the project, provided that granting the waiver does not create specific adverse impacts on public health or safety that cannot be feasibly mitigated.

Child Care Center

Since the R-3 Zone allows for childcare centers with a Site Development Permit, the applicant will need to request an **incentive / concession** to deviate from this requirement to allow the childcare use without obtaining a Site Development Permit.

The project includes a 6,432 sf childcare building on the north portion of the site. Section 65915(h) allows a developer who includes a childcare center in an affordable housing project to request an additional concession or incentive to make the childcare facility financially feasible. . R-3 Zoning allows childcare centers with an approved Site Development Permit. Ministerial approval would require a request of a concession or incentive.

State Supportive Housing Provisions (Gov't Code § 65651)

- California Government Code Section 65651(a)(5) requires that supportive housing developments provide a certain amount of supportive services onsite. In this context, the services are required to be integrated on the same or contiguous parcels of the housing development with the intent to provide easy access to the residents being served. In the proposed project, the supportive housing services are located on a separate parcel separated by Canyon Terrace. The housing units are located farther than 300 feet from the supportive services. Additionally, the site plan shows no continuous ADA connection between the north and south parcels. A key consideration to determine if supportive housing services are in fact being provided “onsite” is for the project to demonstrate connectivity between the housing and the services. The lack of accessibility to the services may conflict with the provision of Government Code Section 65651(a)(5) that requires that “at least 3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are limited to tenant use...” Please confirm that there is ADA accessible pedestrian connectivity between the two parcels and that at least 3 percent of the total nonresidential floor area is reserved for onsite supportive services limited to tenant use.



Mission De Anza Specific Plan

The project site is located within Planning Area 11 of Specific Plan 123, the Mission De Anza Specific Plan. This Specific Plan has been amended multiple times since its original adoption, with the latest amendment being Substantial Conformance No. 9, approved in 2006. Under the guidelines of this Specific Plan, the project site is identified as a 15.30-acre area with a requirement to provide a maximum of 88 units at an average density not exceeding 5.8 dwelling units per acre. The proposed project includes 81 units, achieving an average density of 5.2 dwelling units per acre. The City’s Housing Element identifies this property as sites 84 and 85, which are anticipated to produce 15 and 17 above moderate-income units respectively. A copy of the Mission De Anza Specific Plan is accessible online at: jurupavalley.org/DocumentCenter/View/2396/Mission-De-Anza-Specific-Plan.

Section 9.80.030 R-3 Zone Development Standards

The table below outlines the development standards applicable in the R-3 Zone, providing minimum requirements for lot area, yard setbacks, lot coverage, floor area ratio, building height, and automobile storage. For a complete copy of Section 9.80.030, please visit: [R-3 Zone](#).

Government Code	Requirement	Project Compliance
Sec. 9.80.030 (1)	Minimum lot area of 7,200 sq ft with a minimum average width of 60 ft and minimum average depth of 100 ft.	Project complies with these provisions.
Sec. 9.80.030 (2)	Minimum front and rear yards: 10 ft for buildings ,35 ft in height; additional 2 ft setback for each ft over 35 ft.	Project does not comply with this provision as it proposes a retaining wall within the side yard setback. The retaining wall, considered a structure per JVMC Section 9.10.1200, encroaches into the required setback.
Sec. 9.80.030 (3)	Minimum side yard: 5 ft for buildings ,35 ft in height; additional 2 ft setback for each ft over 35 ft.	Project complies with this provision.
Sec. 9.80.030 (4)	Maximum 50% lot coverage with buildings or structures.	Project complies with this provision.
Sec. 9.80.030 (5)	Floor area ratio not greater than 2:1, excluding basement floor area.	Project complies with this provision.

Government Code	Requirement	Project Compliance
Sec. 9.80.030 (6)	Maximum building height of 50 ft; up to 75 ft permitted per Section 9.240.370.	Project complies with this provision.
Sec. 9.80.030 (7)	Automobile storage space as required by Section 9.240.120.	Refer to the portion of this letter that addresses compatibility with Section 9.240.120 for consistency with specific requirements.

Section 9.240.545 Multiple Family Development Standards

The table below provides an analysis of the project plans and includes only areas of incompatibility for the project. For a complete copy of Section 9.240.545, please visit: [Multiple Family Dwellings](#)

Section	Requirement	Project Compliance
Sec. 9.240.545(B)(1)b – Private Open Space	Min 115 sf for ground units and 75 sf for above ground units.	Does not meet standard. Proposed balconies range from 49 to 58 sq ft. Unit A1.2 and A1.1: 58 sq ft; Units B1.2 and B1.1: 55 sq ft; Unit C1.2: 49 sq ft. Applicant requested a waiver.
Sec. 9.240.545(B)(1)c – Private Open Space	Ground-level private open space must be enclosed by a six-foot fence or wall and screened with shrubs or a wall plus landscaping if next to parking or roads.	Does not meet standard. Includes a 3-foot wall around patio area, providing partial privacy but not fully aligning with design standards. Applicant requested a waiver.
Sec. 9.240.545(B)(3)a – Laundry Services	Washer and dryer hookups required for 8+ unit dwellings	Does not meet standard. No individual washer/dryer connections provided within units or garage as required. Applicant requested a waiver.
Sec. 9.240.545(B)(4)a – Accessory Storage Utility Closet	Utility closet minimum 35 cubic feet	Does not meet standard. Units A1.2, A1.1: 46 cubic feet; Unit B1.1: 69 cubic feet. Units B1.2, C1.2, and C1.1 lack required utility closet space. Applicant requested a waiver.
Sec. 9.240.545(B)(4)b – Accessory Storage Private Lockable	Lockable storage area outside unit, minimum 60 cubic feet	Does not meet standard. Unit A1.2 and A1.1: 56 cubic feet; Units B1.2, B1.1: unspecified. Units C1.2 and C1.1: 40 cubic feet. All units fall below minimum. Applicant requested a waiver.

Section	Requirement	Project Compliance
Sec. 9.240.545(B)(5)b – Parking Management Plan	Parking management plan required	The applicant has not yet submitted a Parking Management Plan. Plan must specify resident/guest parking assignments, outline enforcement, and be reviewed by Community Development Director. The project can be conditioned to require that the applicant submit a Parking Management Plan prior to issuance of a building permit.
Sec. 9.240.545(B)(6)b Landscape Areas Trees	Trees planted at 30-foot intervals	Does not meet standard. Landscaping plans show varied street tree spacing with gaps exceeding 30-foot interval.
Sec. 9.240.545(B)(6)c Landscape Areas	Sidewalks located adjacent to right-of-way with landscaped area	Does not meet standard. Right-of-way areas along Canyon Terrace and Camino Real do not show any landscaping in plans.
Sec. 9.240.545(B)(7)b Walls	Six-foot wall required along property lines with commercial properties	Does not comply. No proposed wall on Site Plan for property abutting commercial zone (APN 185470003). The absence of a required six-foot wall along the property line next to a commercial zone, as per Sec. 9.240.545(B)(7)b, could create issues with privacy, noise, and security. Without this barrier, residents may experience increased noise and visual disruptions from the adjacent commercial property.
Sec. 9.240.545(B)(7)d Walls	Height limit of 42 inches within 20 feet of street	Does not comply. Proposed 18-foot retaining wall exceeds height restriction within 20 feet of Camino Real. Applicant requested a waiver for this development standard.
Sec. 9.240.545(B)(9)a Pedestrian Access	Pedestrian access shall be provided for between the public sidewalk and the on-site walkways that provide access to the dwelling units.”	Does not meet requirement. No pedestrian access between public areas or ROW and on-site walkways. The lack of continuous pedestrian path per Sec. 9.240.545(B)(9)a, may conflict with ADA requirements, and may limit accessibility for individuals with

Section	Requirement	Project Compliance
		<p>disabilities who rely on seamless pathways. This compromises health and safety by potentially forcing pedestrians to navigate through vehicle areas.</p> <p>Additionally, pedestrian access, sidewalks, and offsite improvements are an important aspect of providing a cohesive site design. General Plan Policies LUE 11.6, ME 8.8, ME 8.10, HC 4.9, HC 4.6, HC 4.17 all underscore the requirement to provide pedestrian access, sidewalks, and connectivity.</p>

Section 9.240.120 Off Street Parking

The table below provides an analysis of the project plans and highlights specific provisions of Section 9.240.120 that are not met by the current design. For a complete copy of Section 9.240.120, please visit: [Off Street Parking](#)

Section	Requirement	Project Compliance
Sec. 9.240.120(B)(6)(a)(i) Layout Design Standards (Location of Parking Areas)	No parking space within 3 feet of any property line or closer than 30 feet to the right-of-way property line	Does not comply. Proposed parking is 17 feet 5 inches from the right-of-way, falling short of the required 30-foot setback.
Sec. 9.240.120(B)(6)(c)ii Accessible Parking Location	Accessible parking spaces must provide safe and direct access to curb ramps or pedestrian pathways leading to primary entrances	Does not comply. Buildings 1, 3, and 4 lack accessible parking spaces with direct access to primary entrances, resulting in non-compliance. Accessible parking must be placed directly at building entrances.

Section 9.240.120 (7) Landscaping, General Provisions

The table below provides an analysis of the project’s compliance with landscaping and shading standards specific to parking areas as outlined in Section 9.240.120. The analysis highlights areas where the current design does not meet the specified requirements, including shading, tree placement, perimeter screening, and additional landscaping for larger lots. For a complete copy of Section 9.240.120), please visit: [Off Street Parking](#)

Section	Requirement	Project Compliance
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Sec. 9.240.120(B)(7)(e)(i) Parking Shading Area	Minimum of 50% shade coverage in parking area landscaping	Does not comply. Lot A provides only 27.9% shading, short of the 50% requirement. Lot B meets standard with 53.5% shading.
Sec. 9.240.120(B)(7)(f)(i)g Trees	Prohibition on planting trees within 10 feet of the driveway	Does not comply. Trees are planted within 10 feet of the driveway in residential lot, conflicting with safety standards.
Sec. 9.240.120(B)(7)(f)(i)j Landscaping	Three-foot-high berm or planter with shrubbery required around parking perimeter, with a five-foot width where adjacent to public road	Does not comply. Current design along Canyon Terrace Drive lacks the required landscape berm or shrubbery for screening.
Sec. 9.240.120(B)(7)(f)(i)k Additional Landscaping in Parking Areas	10% of total parking area must be landscaped in lots with 50 or more spaces, especially along scenic highways	Does not comply. Lot A lacks sufficient landscaping, falling short of the required 10% coverage for lots with 50 or more spaces.

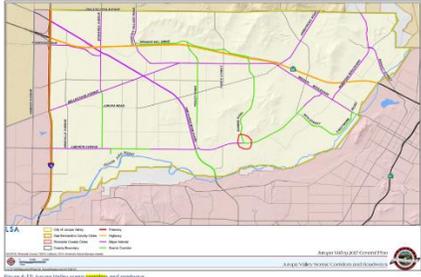
General Plan Policies

The table below summarizes key General Plan policies relevant to the project, outlining requirements and how they apply to this development. These policies emphasize elements such as safe street crossings, compatibility with airport safety standards, thoughtful residential street design, streetscape amenities, connectivity, and scenic view preservation. For each policy, the table highlights its specific relevance to ensure the project aligns with the city's goals for safety, accessibility, and visual appeal.

Policy Element	Requirement	Project Relevance
Land Use Element LUE 11.16 Street Crossings	Mandates new development to provide safe and frequent pedestrian, bicycle and, where appropriate, equestrian street crossings, including over- or underpasses where necessary (Jurupa Valley General Plan, 2024, p. 2-80).	This project is required to prioritize pedestrian access and safe crossings to enhance connectivity between the residential and northern parcels. Currently, the project does not include off-site improvements to address this policy.
Mobility Element LUE 5.65 and LUE 5.56 ALUC Requirements	Requires compliance with Flabob Airport Compatibility Zone E standards, including specific Airport Land Use Commission (ALUC) measures. ALUC reviews are also implemented per LUE 5.65 (p. 2-71), LUE 5.56 (p. 2-68)	Project must incorporate compatibility measures to align with Flabob Airport safety and land use compatibility standards. Currently, the project is undergoing ALUC review.

Policy Element	Requirement	Project Relevance
Mobility Element ME 8.8 Residential Street Design	Emphasizes residential street design. Streets shall be designed to enhance and be compatible with neighborhood character, circulation patterns and modal choices and to provide safe access to neighborhood-serving commercial uses, schools, churches, parks and recreational areas (Jurupa Valley General Plan, 2024, p. 3-73)	Project should ensure residential street design that fosters connectivity, safety, and accessibility for all users. Currently, the project does not include off-site improvements to address this policy.
Mobility Element ME 8.10 Right-of-Way Improvements	Requires right-of-way dedication and improvements. Developers shall be responsible for right-of-way dedication and improvements that provide access to and enhance new developments. Improvements shall include street construction or widening, new paving, frontage improvements like curb, gutter, sidewalks, street trees, trails and parkways, installation of traffic signals, pavement markings and annunciators, and other facilities needed for the safe and efficient movement of pedestrians, bicyclists, equestrians, and motor vehicles (Jurupa Valley General Plan, 2024, p. 3-73)	Project should plan for right-of-way enhancements to support accessibility, safety, and connectivity. Currently, the project does not include off-site improvements to address this policy.
Healthy Community Element HC 4.9 Streetscape Amenities	Mandates incorporation of streetscape amenities, such as sidewalks separated by landscaping and parkways with street trees. Requires new development to include streetscape amenities such as sidewalks that are separated from the roadway by landscaping and parkways with street trees, trails, hitching posts (where appropriate), pedestrian waiting shelters, and other features that enhance safety, walkability, neighborhood appeal, and help commercial neighborhoods stay clean, safe and attractive	Integrating streetscape amenities will enhance safety, walkability, and neighborhood appeal in the development. Currently, the project does not include off-site improvements to address this policy.

Policy Element	Requirement	Project Relevance
	(Jurupa Valley General Plan 2024, p. 10-9).	
Healthy Community Element HC 4.6 Connectivity	Highlights importance of interconnected neighborhoods through well-designed trails and sidewalks. Interconnect neighborhoods with safe, well designed, and regularly maintained walking, equestrian, and/or biking trails and sidewalks, where appropriate, consistent with the City’s Bicycle and Pedestrian Master Plan (Jurupa Valley General Plan, 2024, p. 10-9).	Implementing this policy will promote connectivity and accessibility, enhancing neighborhood cohesion. Currently, the project does not include off-site improvements to address this policy.
Healthy Community Element HC 4.17 Development Features	Requires residential development to include features promoting walking and biking to schools, such as crosswalks and bike racks. The policy establishes a requirement for new residential development to include design features, such as sidewalks, decorative crosswalks, and bulbouts, bike paths and bike racks, to promote walking and biking to schools (Jurupa Valley General Plan, 2024, p. 10-11).	Design features such as sidewalks and bike paths should be included to encourage active transportation options. Currently, the project does not include off-site improvements to address this policy.
Conservation and Open Space Element COS 9.6 Scenic Corridors and Roadways	<p>Mandates preservation of scenic views along scenic corridors, minimizing structures that obstruct visibility. Development projects along and within scenic corridors, including state highway projects, noise walls, and new private or public construction, shall not wall off scenic roadways and block views of scenic resources. The following measures shall be implemented:</p> <ol style="list-style-type: none"> 1. Utilities, traffic signals, and public and private signs and lights shall not intrude on or clutter views, consistent with safety needs. 2. Where important vistas of distant landscape features occur along local 	<p>Project should integrate requirements to preserve scenic views and avoid obstructing visibility along scenic corridors. The policy discusses the importance of avoiding large walls adjacent to streets within scenic corridors, emphasizing the need to preserve open views and prevent obstructions that could block scenic resources. Aside from avoiding large walls in these areas, the policy also underscores the importance of wall design.</p>

Policy Element	Requirement	Project Relevance
	<p>streets, street trees shall be clustered to facilitate viewing (Jurupa Valley General Plan, 2024, p. 4-16)</p> 	

Summary of Requested Waivers, Incentives, and Concessions

The following table outlines the waivers, incentives, and concessions requested to date for the proposed project. These requests are aimed at facilitating project feasibility and addressing specific site constraints while ensuring the development meets essential housing and community standards.

#	Code Section Referenced	Description of Request	Type of Request
1	JVMC Section 9.240.545.B(1)	Remove the requirement for private open space to meet standard dimensions, reducing private space needed for each unit. The project deviates by not providing private open space.	Waiver
2	JVMC Section 9.240.545.B(3)	Reduce the number of required in-unit laundry facilities by providing a communal laundry area with 8 washer/dryer units for all residents. The project deviates from the standard by not providing in-unit washer and dryer hookups and provides a communal laundry area.	Waiver
3	JVMC Section 9.240.545.B(9)	Provide pedestrian access as shown on Site Plan, including connections from each unit to on-site recreation facilities and parking spaces, but no connection to sidewalks. The project deviates from the standard by not providing connection to sidewalks.	Waiver
4	JVMC Section 9.240.120.B(6)(a)(i)	Reduce the required parking area setback from the right-of-way from 30 feet to 17 feet 5 inches, allowing parking spaces closer to the road.	Waiver
5	JVMC Section 9.240.120.B(7)(e)	Reduce the required shading coverage for parking areas from 40% to 29%, lowering environmental shading standards.	Waiver

#	Code Section Referenced	Description of Request	Type of Request
6	JVMC Section 9.240.545.B(11)(a)	Reduce the required 3rd-story step back from the setback line from 30 feet to 21 feet 2 inches for roof overhang, bringing the building closer to property lines. NOTE: This development standard does not apply to the project.	Waiver
7	JVMC Section 9.240.110	Reduce the minimum required dwelling unit size from 750 square feet to 593 square feet, allowing for smaller unit designs.	Waiver
8	JVMC Section 9.240.545(B)(4)	Remove the requirement for an exterior accessory storage space of 60 cubic feet per unit, eliminating additional storage outside of units.	Waiver
9	JVMC Section 9.80.030 (2)	Increase the allowable retaining wall height, considered a structure, within the front yard setback from 42 inches to 18 feet, significantly raising front yard wall limits.	Waiver

California Environmental Quality Act

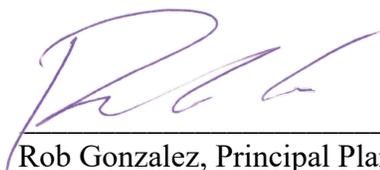
Government Code Section 65651 states that supportive housing shall be allowed by right in zones where multifamily and mixed uses are permitted, including nonresidential zones that allow multifamily uses, provided the housing development meets all requirements outlined in Section 65651(a). If the applicant is able to demonstrate that supportive services are provided onsite, then this project qualifies for an exemption under CEQA Section 15268(a), which establishes an exemption for ministerial permits.

Resubmittal Requested

Please review the enclosed comments carefully and make the necessary revisions to the plans or provide additional information as outlined in the comments. Once the City receives your resubmittal, we will conduct another review of the project and provide further feedback based on the updated submission.

CITY OF JURUPA VALLEY COMMUNITY DEVELOPMENT DEPARTMENT

By:



Rob Gonzalez, Principal Planner



10/16/2024

Craig Lawson & Co., LLC
 C/O Jamie Poster, AICP
 3221 Hutchison Avenue, Suite D
 Los Angeles, CA 90034

RE: MA24164 - STATUS OF APPLICATION LETTER - DEVELOPMENT OF AN 15.53-ACRE VACANT SITE WITH A NEW 80-UNIT SUPPORTIVE HOUSING DEVELOPMENT, ACCESSORY RESIDENTIAL SUPPORTIVE SERVICES (INCLUDING A DAYCARE FACILITY), SURFACE PARKING AND LANDSCAPE IMPROVEMENTS.

Dear Applicant,

This letter serves to inform you that the application for the above-described project has been determined to be complete, as noted below:

- **Complete:** The application includes the information in the Land Use Entitlement Application and addresses the items noted in the previous incomplete letters sent on July 19, 2024, and August 29, 2024.

Land Use Entitlement Application Completeness

The City’s Land Use Entitlement Application notes that projects must submit items listed under the Site Development Permit (Major) application. The summary below includes a review of the items previously noted as incomplete in the July 19, 2024, incompleteness letter.

No.	Name of Item	Description	Notes	Submitted	Complete
1	Project Description and Narrative	Detailed description of the project and its purpose.	A Project Description and Narrative was provided, offering a detailed description of the project and sufficient information about its scope, objectives, and any relevant land use considerations. This	9/16/2024 (revised version)	Yes

No.	Name of Item	Description	Notes	Submitted	Complete
			submittal includes additional information on the supportive housing component of the project to ensure that the project qualifies for the State's ministerial approval process.		
2	Color Architectural Elevations	Colored architectural renderings of the building elevations.	Colored architectural elevations, were provided and include Sheets CLR 1 and CLR 2. The second submittal includes information about the color architectural aspects of the project.	9/16/2024	Yes
3	Color Sample and Materials Board	Samples of colors and materials to be used in the project.	A color samples and materials board was provided. The second submittal includes information about the colors and materials used for the project.	9/16/2024	Yes

Additional Information Demonstrating that the Project Qualifies as “Supportive Housing” for Purposes of the State’s Ministerial Approval Process

In addition to the previously submitted documents, on August 29, 2024 the City requested further information to ensure that the project qualifies as “supportive housing” for purposes of Government Code Section 65582 and for purposes of the ministerial approval process under Government Code Sections 65650 *et seq.* The following details have since been provided:

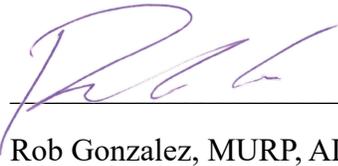
- **Unit Allocation:** 28 of the 80 units will be designated as supportive housing (over 25 %).
- **Target Population:** The target population is identified as homeless veterans.
- **Affordability Restrictions:** The project site will include a 55-year affordability restriction.
- **Supportive Services and Project Operations (Gov. Code § 65652):**
 - Supportive services will be provided by Light House Social Service Centers, a nonprofit 501(c)(3) organization.

- These services will be funded through the California Department of Housing and Community Development's Veteran's Housing and Homelessness Prevention funds.
- The project will employ two staff members.

Staff will continue to review the submitted application and provide feedback on the project's compatibility and consistency with relevant zoning and land use requirements. You can expect feedback within 30 days of receiving this letter. Please contact me with any questions at rgonzalez@jurupavalley.org or (951) 332-6464, extension 149.

Sincerely,

City of Jurupa Valley Planning Division



Rob Gonzalez, MURP, AICP

Principal Planner



July 19, 2024

Craig Lawson & Co., LLC
C/O Jamie Poster, AICP
3221 Hutchison Avenue, Suite D
Los Angeles, CA 90034

RE: MA24164 - STATUS OF APPLICATION LETTER - DEVELOPMENT OF AN 15.53-ACRE VACANT SITE WITH A NEW 80-UNIT SUPPORTIVE HOUSING DEVELOPMENT, ACCESSORY RESIDENTIAL SUPPORTIVE SERVICES, A DAYCARE FACILITY, SURFACE PARKING AND LANDSCAPE IMPROVEMENTS.

Dear Applicant:

Pursuant to state law, a completeness review was conducted for the provided application documents and materials. It has been determined that the application is:

- **Not complete.** The application requires certain information, which is missing. The information needed is listed below and must be supplied before the application can be deemed complete.

Additional information required:

- Provide **color architectural elevations** of the proposed buildings.
- Provide **a color sample and materials board** for the proposed buildings.
- Information required on the **Architectural Site Plan**:
 - Due to the size of the site, provide a detailed site plans be provided that focus on various portions of the site as this will help confirm compliance with municipal code requirements.
 - Complete legal description of the property.
 - On site plans that demonstrate all existing lot lines.
 - For zone setback and building permit purposes, buildings typically cannot be placed over or within setbacks from a lot line. Lot line issues can be resolved by confirming setback requirements, adjusting the location of buildings to avoid placement issues, or completing a lot merger to remove conflicting lot lines
 - Existing zoning classification and General Plan Land Use designation of the subject property and the properties immediately surrounding it.
 - Assessor's Parcel Numbers and, if available, address of the property.



- If the project is within a Specific Plan, indicate the Specific Plan number and name, the Planning Area number, and the Land Use designation of the subject property and all surrounding properties.
- Names of utility purveyors and school district(s), including providers of water, sewer, gas, electricity, telephone, and cable television. If within a water or sewer provider's jurisdictional boundary, indicate if service is available at the project site; if not, specify how far water lines or sewer lines must be extended to provide service (distance in feet/miles).
- Location, widths, and improvements of existing and proposed public utility easements, transmission lines, power and telephone poles, and underground utilities on or abutting the property.
- Plot the location of any known existing wells on the property or within 200 feet of the project boundary.
- List and accurately show all easements of record (by map or instrument number).
- Existing topography of the property, with the source(s) of the contour lines identified. The contour lines shall extend 300 feet beyond the exterior boundaries of the subject property when adjacent property is unimproved or vacant. When adjacent property is improved or not vacant, contour lines shall extend beyond the exterior boundaries of the subject property a distance sufficient to determine compatibility with adjacent property. Maximum contour interval should be five feet. Flood Control District and Transportation Department base maps are acceptable sources of information. Topography from U.S.G.S. maps may be used only when more detailed information is not available. Additional topography may be required if deemed necessary.
- Spot elevations (proposed finished elevations) sufficient to demonstrate that streets, driveways, parking lots, and drainage grades meet minimum requirements. Provide spot elevations at street intersections, ends, cul-de-sacs, beginning and end of all driveways, parking lot outer limits, entrance and end points, and at all grade breaks.
- Labeled common areas, open space, and recreational areas, with location, dimensions, acreage, any known proposed uses, and name of proposed owner(s) or entity(ies) who will maintain these areas.
- Please provide additional information on the **architectural elevation plans**:
 - Details of any wall-mounted signs.
 - Details of any mounted air conditioning equipment.
 - Details of any mounted solar equipment.
 - Details of any other equipment mounted on exterior walls.
- Please provide information about **the signs**:



- Include information and diagrams of the free-standing signs and monument signs proposed for the project.
- Please provide a **wall and fence plan**:
 - Location, dimensions, setbacks, and nature of proposed and existing fences, gates, walls, free-standing signs, driveways, turnouts/turnarounds, curbs, drainage structures, and above and below-ground structures, including septic subsurface sewage disposal systems.
 - Provide a diagram of the proposed retaining wall located along Camino Real.
 - Walls located within 20 feet of any street shall be constructed of decorative concrete block
- Please provide a diagram of the **trash enclosures**.

Please provide the above-referenced additional plans and information for the proposed project. Please do not hesitate to contact me should you have any questions at rgonzalez@jurupavalley.org or (951) 332-6464 x 149.

Sincerely,

CITY OF JURUPA VALLEY COMMUNITY DEVELOPMENT DEPARTMENT

Rob Gonzalez, Senior Planner

ATTACHMENT NO. 6

Correspondences from Housing and Community
Development (HCD)

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannan Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



June 24, 2025

Brian Berkson, Mayor
Chris Barajas, Mayor Pro Tem Armando Carmona,
Guillermo Silva, and Veronica Sanchez, Councilmembers
City of Jurupa Valley City Council
8930 Limonite Avenue
Jurupa Valley, CA 92509

Dear Mayor Brian Berkson, Mayor Pro Tem Chris Barajas, and Councilmembers Armando Carmona, Guillermo Silva, and Veronica Sanchez:

RE: Jurupa Valley AB 2162 Camino Terrace – Notice of Potential Violation

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding compliance with AB 2162¹ for a proposed supportive housing project (Project) at the intersection of Limonite Avenue and Camino Real in the City of Jurupa Valley (City). Among other provisions, AB 2162 makes supportive housing a use by right if projects meet specified requirements. On February 13, 2025, the City issued a notice of decision denying the project, citing a lack of eligibility for AB 2162 due to the absence of onsite supportive services and findings of specific, adverse impacts to public health and safety per the Housing Accountability Act (HAA),² including the lack of an accessible sidewalk and inconsistent use classification. After the applicant appealed the denial to the City's Planning Commission, the Commission upheld the denial on April 28, 2025, citing the onsite supportive services issue and additional findings under the HAA. Ahead of the scheduled City Council hearing on the appeal of the Project's denial, HCD hereby notifies the City that making improper findings to support a denial of the project – and the appeal – under the HAA would constitute a violation of state housing law.

Background

HCD understands that the proposed Project consists of 80 units affordable to low-income households (excluding a manager's unit), of which 25 units would be supportive housing intended for a target population that includes veterans who have experienced homelessness and who may have physical disabilities.

¹ Chapter 753, Statutes of 2018; Gov. Code, §§ 65583, subd. (c)(3), 65650 et seq.

² Gov. Code, § 65589.5.

The Project would be located on multiple parcels separated by Canyon Terrace Drive; the residential units would be located on the southern parcels, while the onsite supportive services would be located on the northern parcel along with a daycare facility open to both residents and the public. Wakeland is proposing the Project using the City's supportive housing ordinance,³ which implements AB 2162, and the State Density Bonus Law (SDBL).⁴

The applicant originally submitted its application for the Project on June 21, 2024. The City deemed the application complete on October 16, 2024. On November 15, 2024, the City issued the applicant a zoning compatibility letter⁵ identifying inconsistencies. The letter highlighted two issues that were referred to HCD for review. First, the City was uncertain whether supportive housing services could be considered "onsite" due to the site plan not showing a continuous Americans with Disabilities Act (ADA) path of travel between the parcels across Canyon Terrace Drive. Second, because the site's zoning requires a site development permit for childcare centers, the City required the developer to seek an additional incentive or concession under the SDBL to allow the childcare use without the site development permit.

Because the applicant did not subsequently address these two issues raised by the City, the City denied the Project for these reasons and others laid out in the notice of decision on February 15, 2025. In denying the Project, the City claimed that the Project did not have onsite services because it "includes supportive services on a separate parcel that is located across the street from the 80 housing units" and "fails to provide adequate connectivity between the two parcels such that those residing in the housing units could have access to the services located on the other parcel."⁶ The City further claimed a lack of compliance with City general policies that resulted in "specific, adverse impacts upon the public health and safety" under the HAA, including the aforementioned pedestrian access issue and the absence of a waiver for the childcare use. The City also claimed specific, adverse impacts from the configuration of parking spaces, unresolved items in the Project's fire protection plan, excessive height in a retaining wall along a street, and lack of compliance with various objective design standards not addressed with SDBL incentives or waivers.

The applicant subsequently appealed the denial to the Planning Commission. On April 24, 2025, HCD sent the Planning Commission a Notice of Potential Violation, advising that denying the appeal and upholding the denial of the Project on the grounds laid out in the notice of decision would constitute a violation of state housing law. On April 28, 2025, the Planning Commission met to consider the appeal and upheld the denial of the Project. In its resolution, the Commission reiterated the City's position that

³ Jurupa Valley Municipal Code Section 9.240.555.

⁴ Gov. Code, § 65915 et seq.

⁵ A zoning compatibility letter is the City's method of communicating inconsistency items to an applicant. It is unrelated to an application completeness letter pursuant to the Permit Streamlining Act or a consistency determination pursuant to the Housing Accountability Act.

⁶ City of Jurupa Valley Notice of Decision for MA24164, February 15, 2025, page 10.

Canyon Terrance Drive separated the project into multiple sites that each required supportive services. The resolution made further findings under the HAA, claiming that the absence of off-site sidewalk improvements connecting the project site to the nearest bus stops at Limonite Avenue and Camino Real constituted a specific, adverse impact to public health or safety that could not be mitigated without rendering the Project unaffordable to low- and moderate-income households, and that the lack of sidewalks would violate the federal Americans with Disabilities Act (ADA) and the California Building Code. It also claims that the childcare center's lack of a site development permit rendered the Project inconsistent with objective development standards, and that the lack of sidewalks was inconsistent with the City's general plan mobility element. The applicant subsequently appealed the decision to the City Council, with a meeting scheduled for June 26, 2025.

HAA Findings

Government Code section 65589.5, subdivisions (d) and (j) specify the written findings local governments must establish to disapprove a housing development project for very low-, low-, or moderate-income households. Given the findings made by the Planning Commission's denial resolution, the relevant question for the Project is: **What findings are necessary to justify a denial of a housing development project for very low-, low-, or moderate-income households?**

First, to deny a housing development project for specific, adverse impacts on public health or safety, a local government must make "written findings, based on a preponderance of evidence in the record"⁷ that there is a "significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions."⁸ In its denial resolution, the City does not demonstrate in its written findings that there is "no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low- and moderate-income households."⁹ For example, for the Canyon Terrace pedestrian crossing, the City could condition its approval on sidewalk improvements. Doing so would likely mitigate any potential health or safety risks.

Second, a local government can deny a project if "the denial [...] or imposition of conditions is required in order to comply with specific state or federal law, and there is no feasible method to comply without rendering the development unaffordable to low- and moderate-income households or rendering the development of the emergency shelter financially infeasible."¹⁰ The City cites Section 206.2.1 of the ADA Standards for Accessible Design along with Sections 1114B.1.2 and 11B-206.2.1 of the California Building Code to demonstrate that denial is necessary to comply with state law.

⁷ Gov. Code, § 65589.5, subd. (d).

⁸ Gov. Code, § 65589.5, subd. (d)(2).

⁹ *Id.*

¹⁰ Gov. Code, § 65589.5, subd. (d)(3).

However, all three sections require the provision of sidewalks within the site,¹¹ while the sidewalk connection sought by the City would be outside the boundary of the site as demonstrated on the Project's conceptual landscape plan.¹²

Finally, subdivision (j) of the HAA implicitly provides local governments with the ability to deny a housing development project for lack of compliance with objective general plan and zoning standards. In addition to the childcare use issue addressed in a section below, the City cites a lack of compliance with the Municipal Code's requirement for accessible parking spaces.¹³ However, the cited section of the Municipal Code requires "optimum proximity to curb ramps or other pedestrian ways thereby, providing the most direct access to the primary entrance of the building served by the parking lot."¹⁴ According to the development's architectural site plan, the proposed locations of accessible parking spaces, although generally opposite the proposed residential buildings, are directly adjacent to walkways that connect to the primary entrance of the buildings.¹⁵ The City also cites the General Plan Mobility Element's requirements for street improvements that include sidewalks and ADA-compliant walkways within residential developments,¹⁶ but these requirements do not necessarily require off-site sidewalk improvements, with Policy 3.21 following ADA requirements for walkways within residential developments.

Supportive Housing Site Configuration

Government Code section 65651, subdivision (a)(5) requires that supportive housing developments provide a certain amount of supportive services onsite. Therefore, the relevant question is: **Can a site that is bisected by a roadway be developed as a single permanent supportive housing development?**

AB 2162 does not prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development. The 3-percent onsite supportive services requirement would be applied to the project overall and not to each constituent part of the project site.¹⁷ Where onsite supportive services are mentioned, they are referred to in the context of a singular "development" as opposed to a single building.

¹¹ Jurupa Valley Planning Commission Reso. No. PC-2025-06, page 5.

¹² Jurupa Valley Planning Commission April 28, 2025 meeting item no. 3 staff report, <https://www.jurupavalley.org/AgendaCenter/ViewFile/Item/2942?fileID=3135>, page 68.

¹³ Jurupa Valley Planning Commission Reso. No. PC-2025-06, page 7.

¹⁴ Jurupa Valley Municipal Code Section 9.240.120(6)(c)(ii).

¹⁵ Jurupa Valley Planning Commission April 28, 2025 meeting item no. 3 staff report, <https://www.jurupavalley.org/AgendaCenter/ViewFile/Item/2942?fileID=3135>, page 32.

¹⁶ Jurupa Valley Planning Commission Reso. No. PC-2025-06, page 7.

¹⁷ Although not explicitly stated in AB 2162, other statutes that deal with ministerial approvals contain clauses that define parcels separated only by a street right-of-way as being one site. Examples include the Streamlined Ministerial Approval Process (Gov. Code, § 65913.4, subd. (a)(2)(B)) and the Affordable Housing and High Road Jobs Act of 2022 (Gov. Code, § 65912.103, subd. (b)).

Supportive Housing Uses

Government Code section 65651, subdivision (a) declares that “[s]upportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses” if the proposed development satisfies the requirements of the statute. Therefore, the relevant question is: **Would a permanent supportive housing project which incorporates childcare use be entitled to the benefits of AB 2162? If not, could the childcare use be permitted via an alternative approval mechanism such as an SDBL incentive or concession?**

The answer is “yes.” Permanent supportive housing can include a childcare use and maintain its eligibility under AB 2162. Specifically, Government Code section 65650, subdivision (b), references Health and Safety Code section 50675.2 in defining supportive housing. Health and Safety Code section 50675.2, subdivision (h) defines supportive housing as being “linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live, and when possible, work in the community.” Adequate childcare is crucial for both child and parent residents of supportive housing who are trying to be integrated into the community and therefore qualifies for the benefits of by-right processing that AB 2162 provides to a supportive housing project in which the childcare is included. Furthermore, 47 of the project’s 80 units have two to three bedrooms. This makes it likely that children living on site will be beneficiaries of the onsite services. While the facility will be open to the general public, the applicant intends for the facility to be substantially used by children living in the development. HCD also understands that the childcare facility is not the only supportive service onsite, and the applicant has prepared a supportive services plan as required by statute that includes counseling services among others.

Other Potential Violations of State Law

The City should also consider whether denying the Project would violate other state laws.

Affirmatively Furthering Fair Housing (AFFH), Government Code sections 8899.50 and 65583

Government Code section 8899.50 requires the City to “tak[e] meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”¹⁸ Housing Element Law, specifically, Government Code section 65583, includes more specific obligations that require the City, for example, to affirmatively protect, promote, and remove constraints on housing for persons with low and very low incomes and persons with other protected characteristics, which, for the

¹⁸ Gov. Code, § 8899.50, subs. (a)(1), (a)(2)(B).

Project, would include veterans and persons with disabilities.¹⁹ Section 65583 also requires the City to use data, quantifiable analysis, metrics, and milestones to implement its AFFH duties.²⁰

The City should ensure that its treatment of this Project is consistent with its AFFH duties.

Anti-Discrimination in Land Use Law, Government Code section 65008

Government Code section 65008 prohibits discrimination in land use and planning policies and practices. Section 65008 deems any action taken by a city or county to be null and void if such action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or any other land use in the state due to discrimination based on a protected characteristic.²¹ The law further provides that no city shall enact or administer its laws so as to "prohibit or discriminate against any residential development . . . because of the method of financing" or because "the development . . . is intended for occupancy" by persons with protected characteristics.²² In addition, no city may impose requirements on a residential project intended for use by persons with protected characteristics, other than those generally imposed upon other residential uses.²³

Government Code section 65008 and its protections apply to the Project because it is intended for occupancy by, for example, persons with low and very low incomes, veterans, and persons with disabilities.²⁴ The City should ensure that its treatment of this Project is consistent with its duties under section 65008. This includes considering whether denying the Project would have discriminatory effects, either by creating disparate impacts on persons with protected characteristics or by perpetuating segregated housing patterns. This also includes ensuring that the City's treatment of the Project is not influenced in any manner by intentional discrimination.

Failure to Implement Housing Element Goals, Policies, and Programs, Government Code section 65585

Housing Element Law prohibits the City from taking an action or failing to take an action that is "inconsistent with an adopted housing element or [Government Code] Section 65583, including any failure to implement any program included in [its] housing element."²⁵ The City should consider its treatment of the Project in light of its housing element's goals, policies, and programs, including, for example:

¹⁹ Gov. Code, § 65583, subs. (a)(5), (a)(7), (b)(1), (c)(3), (c)(5), (c)(10)(A).

²⁰ *Id.*

²¹ Gov. Code, § 65008, subd. (a).

²² *Id.*, subd. (b).

²³ *Id.*, subd. (d)(2)(A).

²⁴ *Id.*, subs. (a), (b), (d)(2)(A).

²⁵ Gov. Code, § 65585, subd. (i)(1)(A).

- **H.E. 1.2. Affordable Housing.** Encourage affordable residential development on sites zoned to allow multi-family residential uses and identified in the vacant land inventory, the City will adopt development incentives and standards to encourage lot consolidation
- **H.E. 1.4. Housing Diversity.** Encourage the development of diverse housing types and housing densities to best meet the needs of the community.
- **H.E. 1.8. Housing for Homeless Persons and Those at Risk of Homelessness.** In cooperation with other cities and/or the County of Riverside, assist in the development of . . . permanent supportive housing
- **H.E. 1.9. Housing for All Special Needs Groups.** Ensure and encourage the availability of housing to all [s]pecial needs populations and income levels.
- **H.E. 3.3. Housing Opportunities for Seniors, Disabled Persons, Single Parent Households, Farmworkers, Veterans, Homeless and all other Special Needs Groups.** Encourage and, as the budget allows, help support programs and activities that promote affordable housing opportunities for seniors, disabled persons, single parent household[s], farm workers, homeless, veterans, and all other special needs groups.
- **H.E. 6.1. Taking Meaningful Action.** Take meaningful action to affirmatively further fair housing by implementing measures to improve housing mobility, provide new opportunities in higher opportunity areas, encourage place-based strategies for community revitalization, and discourage displacement.
- **Goal HE 2.1.9. Remove Government Constraints.** Evaluate the zoning ordinance, subdivision requirements, and other City regulations to remove government constraints to the maintenance, improvement, and development of housing, where appropriate and legally possible. . . .

Conclusion

HCD finds that (1) the City did not make the requisite findings required by the HAA in denying the Project, (2) adjacent parcels can be considered part of the same site even if there is not a pedestrian connection (though a local government can condition approval on the installation of a connection), and (3) daycare facilities included in a qualifying supportive housing project should also benefit from the by-right processing AB 2162 requires. Denying the Project on these grounds would be a violation of the HAA and AB 2162. The City should also consider whether denying the Project would violate its AFFH duties, Government Code section 65008, and Housing Element Law.

Mayor Brian Berkson, Mayor Pro Tem Chris Barajas, Councilmembers Armando Carmona, Guillermo Silva, and Veronica Sanchez

Page 8

Under Government Code section 65585, HCD must notify a local government when that local government takes actions that violate the HAA, AB 2162, and other laws that HCD enforces, and may notify the California Office of the Attorney General of these and other violations of state housing laws. If you have questions or need additional information, please contact David Ying at david.ying@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Zisser', with a long horizontal flourish extending to the right.

David Zisser
Assistant Deputy Director
Local Government Relations and Accountability

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannon Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



April 24, 2025

Arleen Pruitt, Chair
Laura Shultz, Chair Pro Tem
Uriel de la Torre, Penny Newman, Christobal Rosales, Commissioners
City of Jurupa Valley Planning Commission

8930 Limonite Avenue
Jurupa Valley, CA 92509

Dear Arleen Pruitt, Laura Shultz, Uriel de la Torre, Penny Newman, and
Christobal Rosales:

RE: Jurupa Valley AB 2162 Camino Terrace – Notice of Potential Violation

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding compliance with AB 2162¹ for a proposed supportive housing project (Project) at the intersection of Limonite Avenue and Camino Real in the City of Jurupa Valley (City). Among other provisions, AB 2162 makes supportive housing a use by right if projects meet specified requirements. On February 13, 2025, the City issued a notice of decision denying the project, citing a lack of eligibility for AB 2162 due to the absence of onsite supportive housing and findings of specific, adverse impacts to public health and safety per the Housing Accountability Act (HAA),² including the lack of an accessible sidewalk across a street and inconsistent use classification. Ahead of the scheduled hearing on the appeal of the Project's denial, HCD hereby notifies the City that failing to grant the appeal would constitute a violation of state housing law.

Background

HCD understands that the proposed Project consists of 80 units affordable to low-income households (excluding a manager's unit), of which 25 units would be supportive housing intended for a target population that includes veterans who have experienced homelessness and who may have physical disabilities. The Project would be located on multiple parcels separated by Canyon Terrace; the residential units would be located on the southern parcels, while the onsite supportive services would be located on the northern parcel along with a daycare facility open to both residents and the public.

¹ Chapter 753, Statutes of 2018; Gov. Code, §§ 65583, subd. (c)(3), 65650 et seq.

² Gov. Code, § 65589.5.

Wakeland is proposing the Project using the City's supportive housing ordinance,³ which references AB 2162 and the State Density Bonus Law (SDBL).⁴

Wakefield originally submitted its application for the Project on June 21, 2024. The City deemed the application complete on October 16, 2024. On November 15, 2024, the City issued the applicant a zoning compatibility letter⁵ identifying inconsistencies. The letter highlighted two issues that were referred to HCD for review. First, the City was uncertain whether supportive housing services could be considered "onsite" due to the site plan not showing a continuous Americans with Disabilities Act (ADA) connection between the parcels across Camino Terrace. Second, because the site's zoning requires a site development permit for childcare centers, the City required the developer to seek an additional incentive or concession under the SDBL to allow the childcare use without the site development permit.

Because the applicant did not subsequently address these two issues raised by the City, the City denied the Project for these reasons and others laid out in the notice of decision. In denying the Project, the City claimed that the Project did not have onsite services because it "includes supportive services on a separate parcel that is located across the street from the 80 housing units" and "fails to provide adequate connectivity between the two parcels such that those residing in the housing units could have access to the services located on the other parcel."⁶ The City further claimed a lack of compliance with City general policies that resulted in "specific, adverse impacts upon the public health and safety" under the HAA, including the aforementioned pedestrian access issue and the absence of a waiver for the childcare use. The City also claimed specific, adverse impacts from the configuration of parking spaces, unresolved items in the Project's fire protection plan, excessive height in a retaining wall along a street, and lack of compliance with various objective design standards not addressed with SDBL incentives or waivers. The applicant subsequently appealed the denial to the City Council for a hearing scheduled for April 28, 2025.

HAA Findings

Government Code section 65589.5, subdivision (d)(2) specifies the written findings local governments must establish to disapprove a housing development project for very low-, low-, or moderate-income households when there is a specific, adverse impact. Given that the City cited the inconsistency with development standards as specific, adverse impacts that required project denial, the relevant question for the Project is:

³ Jurupa Valley Municipal Code Section 9.240.555.

⁴ Gov. Code, § 65915 et seq.

⁵ A zoning compatibility letter is the City's method of communicating inconsistency items to an applicant. It is unrelated to an application completeness letter per the Permit Streamlining Act or a consistency determination pursuant to the Housing Accountability Act.

⁶ City of Jurupa Valley Notice of Decision for MA24164, February 15, 2025, page 10.

Can inconsistency with development standards alone qualify as specific, adverse impacts that justify the denial of a housing development project for very low-, low-, or moderate-income households?

The answer is “no” for several reasons. First, the claimed specific, adverse impacts are not necessarily identified based on “written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.”⁷ For example, the City identifies non-compliance with standards such as landscaping and property walls as creating “specific, adverse impacts upon the public health and safety.”⁸ However, the City does not demonstrate that the standards are based on preexisting, written public health or safety standards instead of design standards for regulating aesthetics.

Similarly, the City cannot deny the Project based solely on findings of “[i]nconsistenc[ies] with the zoning ordinance or general plan land use designation.”⁹ For example, the City identifies non-compliance with off-street vehicle parking¹⁰ and wall height¹¹ standards as causing specific, adverse impacts. Such findings of inconsistencies with the City’s zoning ordinance are not in themselves sufficient grounds to deny the Project absent additional findings that the inconsistencies would create adverse impacts that have already been documented in “written public health and safety standards, policies, or conditions,” and that “there is no feasible method to satisfactorily mitigate or avoid” these impacts.¹²

Finally, the City does not demonstrate in its written findings that there is “no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low- and moderate-income households.”¹³ For example, for the Canyon Terrace pedestrian crossing, the City could condition its approval on improvements to the intersection that would render the crossing ADA accessible. Doing so would likely mitigate any potential health safety risks associated with the crossing.

Supportive Housing Site Configuration

Government Code section 65651, subdivision (a)(5) requires that supportive housing developments provide a certain amount of supportive services onsite. Because the site is bisected by a roadway, the City is concerned that the apparent absence of an ADA-

⁷ Gov. Code, § 65589.5, subd. (d)(2).

⁸ Jurupa Valley Notice of Decision, page 9.

⁹ Gov. Code, § 65589.5, subd. (d)(2)(A).

¹⁰ Jurupa Valley Municipal Code Section 9.240.120.

¹¹ Jurupa Valley Municipal Code Section 9.240.545.

¹² Gov. Code, § 65589.5, subd. (d)(2).

¹³ *Id.*

accessible pedestrian path of travel between the two parcels may conflict with a provision of the law that requires that “at least 3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are limited to tenant use...”¹⁴ Therefore, the relevant question is:

Can a site that is bisected by a roadway be developed as a single permanent supportive housing development? If so, to what extent does the roadway dividing the site need to have pedestrian connectivity?

There is nothing in AB 2162 that would prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development. The 3-percent onsite supportive services requirement would be applied to the project overall and not to each constituent part of the project site.¹⁵ Where onsite supportive services are mentioned, they are referred to in the context of a singular “development.” However, the Government Code text does not preclude the City from conditioning its approval on intersection improvements as previously mentioned.

Supportive Housing Uses

Government Code section 65651, subdivision (a) declares that “[s]upportive housing shall be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses” if the proposed development satisfies the requirements of the statute. Therefore, the relevant question is:

Would a permanent supportive housing project which incorporates childcare use be entitled to the benefits of AB 2162? If not, could the childcare use be permitted via an alternative approval mechanism such as an SDBL incentive or concession?

The answer is “yes.” Permanent supportive housing can include a childcare use and maintain its eligibility under AB 2162. AB 2162, specifically Government Code section 65650, subdivision (b), references Health and Safety Code section 50675.2 in defining supportive housing. Specifically, Health and Safety Code section 50675.2, subdivision (h) defines supportive housing as being “linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live, and when possible, work in the community.” Adequate childcare is crucial for both child and parent residents of supportive housing who are trying to be integrated into the community and therefore qualifies for the

¹⁴ Gov. Code, § 65651, subd. (a)(5)(B).

¹⁵ Although not explicitly stated in AB 2162, other statutes that deal with ministerial approvals contain clauses that define parcels separated only by a street right-of-way as being one site. Examples include the Streamlined Ministerial Process (Gov. Code, § 65913.4, subd. (a)(2)(B)) and the Affordable Housing and High Road Jobs Act of 2022 (Gov. Code, § 65912.103, subd. (b)).

benefits of by-right processing that AB 2162 provides to a supportive housing project in which a childcare use is included.

Other Potential Violations of State Law

The City should also consider whether denying the Project would violate other state laws.

Affirmatively Furthering Fair Housing (AFFH), Government Code sections 8899.50 and 65583

Government Code section 8899.50 requires the City to “tak[e] meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”¹⁶ Government Code section 65583 includes more specific obligations that require the City, for example, to affirmatively protect, promote, and remove constraints on housing for persons with low and very low incomes and persons with other protected characteristics, which, for the Project, would include veterans and persons with disabilities.¹⁷ Section 65583 also requires the City to use data, quantifiable analysis, metrics, and milestones to implement its AFFH duties.¹⁸

The City should ensure that its treatment of this Project is consistent with its AFFH duties.

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Government Code section 65008 prohibits discrimination in land use and planning policies and practices. Section 65008 deems any action taken by a city or county to be null and void if such action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or any other land use in the state due to discrimination based on a protected characteristic.¹⁹ The law further provides that no city shall enact or administer its laws so as to “prohibit or discriminate against any residential development . . . because of the method of financing” or because “the development . . . is intended for occupancy” by persons with protected characteristics.²⁰ In addition, no city may impose requirements on a residential project intended for use by persons with protected characteristics, other than those generally imposed upon other residential uses.²¹

¹⁶ Gov. Code, § 8899.50, subs. (a)(1), (a)(2)(B).

¹⁷ Gov. Code, § 65583, subs. (a)(5), (a)(7), (b)(1), (c)(3), (c)(5), (c)(10)(A).

¹⁸ *Id.*

¹⁹ Gov. Code, § 65008, subd. (a).

²⁰ *Id.*, subd. (b).

²¹ *Id.*, subd. (d)(2)(A).

Government Code section 65008 and its protections apply to the Project because it is intended for occupancy by, for example, persons with low and very low incomes, veterans, and persons with disabilities.²² The City should ensure that its treatment of this Project is consistent with its duties under section 65008. This includes considering whether denying the Project would have discriminatory effects, either by creating disparate impacts on persons with protected characteristics or by perpetuating segregated housing patterns. This also includes ensuring that the City's treatment of the Project is not influenced in any manner by intentional discrimination.

Failure to Implement Housing Element Goals, Policies, and Programs, Government Code section 65585

Housing Element Law prohibits the City from taking an action or failing to take an action that is "inconsistent with an adopted housing element or [Government Code] Section 65583, including any failure to implement any program included in [its] housing element."²³ The City should consider its treatment of the Project in light of its housing element's goals, policies, and programs, including, for example:

- **H.E. 1.2. Affordable Housing.** Encourage affordable residential development on sites zoned to allow multi-family residential uses and identified in the vacant land inventory, the City will adopt development incentives and standards to encourage lot consolidation
- **H.E. 1.4. Housing Diversity.** Encourage the development of diverse housing types and housing densities to best meet the needs of the community.
- **H.E. 1.8. Housing for Homeless Persons and Those at Risk of Homelessness.** In cooperation with other cities and/or the County of Riverside, assist in the development of . . . permanent supportive housing
- **H.E. 1.9. Housing for All Special Needs Groups.** Ensure and encourage the availability of housing to all [s]pecial needs populations and income levels.
- **H.E. 3.3. Housing Opportunities for Seniors, Disabled Persons, Single Parent Households, Farmworkers, Veterans, Homeless and all other Special Needs Groups.** Encourage and, as the budget allows, help support programs and activities that promote affordable housing opportunities for seniors, disabled persons, single parent household[s], farm workers, homeless, veterans, and all other special needs groups.

²² *Id.*, subds. (a), (b), (d)(2)(A).

²³ Gov. Code, § 65585, subd. (i)(1)(A).

- **H.E. 6.1. Taking Meaningful Action.** Take meaningful action to affirmatively further fair housing by implementing measures to improve housing mobility, provide new opportunities in higher opportunity areas, encourage place-based strategies for community revitalization, and discourage displacement.
- **Goal HE 2.1.9. Remove Government Constraints.** Evaluate the zoning ordinance, subdivision requirements, and other City regulations to remove government constraints to the maintenance, improvement, and development of housing, where appropriate and legally possible. . . .

Conclusion

HCD finds that (1) the City did not make the requisite findings required by the HAA in denying the project, (2) adjacent parcels can be considered part of the same site even if there is not a pedestrian connection (though a local government can condition approval on the installation of a connection), and (3) daycare facilities included in a qualifying supportive housing project should also benefit from the by-right processing AB 2162 requires. Failure to grant the appeal and approve the Project on these grounds would be a violation of the HAA and AB 2162. The City should also consider whether denying the Project would violate its AFFH duties, Government Code section 65008, and Housing Element Law.

Under Government Code section 65585, HCD must notify a local government when that local government takes actions that violate the HAA, AB 2162, and other laws that HCD enforces, and may notify the California Office of the Attorney General of these and other violations of state housing laws. If you have questions or need additional information, please contact David Ying at david.ying@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Zisser', with a long horizontal flourish extending to the right.

David Zisser
Assistant Deputy Director
Local Government Relations and Accountability

ATTACHMENT NO. 7

Updated Site Plan Alternative



SEE SHEET LC.1B

GRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 1202 COLLEMAN ST., SUITE 100
 SAN DIEGO, CALIF. 92101
 (619) 226-2266 FAX: (619) 226-0806

CONCEPTUAL LANDSCAPE PLAN

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
▲			▲		
▲			▲		

DATE: **FEBRUARY 27, 2025**

JOB NO. _____

DRAWN: _____

CHECKED: _____

LC.1

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- LANDSCAPE ELEMENTS KEY: LOT 'B'**
- 1 TAC-COMPLIANT TOTPOLE WITH 2-5 AND 5-12 PLAY EQUIPMENT, SHADE SAIL, SEATING, & SHADE TREES.
 - 2 RETAINING WALL - SEE CIVIL PLANS.
 - 3 CONCRETE RAMPS & HANDRAILS.
 - 4 DECORATIVE SHORT-TERM BIKE RACK.
 - 5 42-IN HIGH OPEN METAL FENCE AT TOP OF SLOPE.
 - 6 PEDESTRIAN CROSSING WITH ALTERNATE PAVING PATTERN.
 - 7 PET RELIEF AREA WITH TUFF, BENCH, & WASTE BAG STATION.
 - 8 BACKDROP PATIO WITH SEATING & WASTE BIN.
 - 9 RESIDENT BBQ AREA WITH SEATING.
 - 10 SMALL PATIO WITH SEATING, ACCENT TREE, & PAVERS.
 - 11 CONCRETE STRESS PAD FOR TRASH TRUCK.
 - 12 NEW 6-FT MASONRY WALL AT COMMERCIAL PROPERTY LINE.

TREES AT STREET FRONTAGE
 CANOPY HEIGHT: 40-50 FT (16 TREES)
 AVERAGE SPACING: 38.25 TREES/FT



A CONCEPTUAL LANDSCAPE PLAN: LOT 'B'
 1"=30'-0" NORTH

CAMINO TERRACE APARTMENTS
 JURUPA VALLEY - CALIFORNIA

WAKELAND HOUSING AND DEVELOPMENT CORP.
 1200 COLUMBIA ST., SUITE 900
 9490 SERRA, CALIF. 92121
 619.226.2266 FAX: 619.226.2266

CONCEPTUAL LANDSCAPE PLAN
 LOT 'B'

REV. NO.	DESCRIPTION	DATE	REV. NO.	DESCRIPTION	DATE
▲			▲		
▲			▲		
▲			▲		

DATE: **FEBRUARY 27, 2025**

JOB NO. _____
 DRAWN: _____
 CHECKED: _____

LC.1B

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ATTACHMENT NO. 8

August 7th, 2025 Staff Report

City of Jurupa Valley

STAFF REPORT

DATE: AUGUST 7, 2025
TO: HONORABLE MAYOR AND CITY COUNCIL
FROM: ROD BUTLER, CITY MANAGER
BY: JOE PEREZ, ASSISTANT CITY MANAGER/COMMUNITY DEVELOPMENT DIRECTOR
SUBJECT: AGENDA ITEM NO. A

PUBLIC HEARING TO CONSIDER APPEAL (MA25133, AP25002) TO THE CITY COUNCIL OF THE PLANNING COMMISSION'S DECISION TO UPHOLD THE MINISTERIAL STAFF DENIAL OF CAMINO TERRACE APARTMENTS (MA24164, SDP24074), AN 80-UNIT AFFORDABLE HOUSING PROJECT CONSISTING OF 28 SUPPORTIVE HOUSING UNITS, 51 AFFORDABLE HOUSING UNITS, ONE MANAGER'S UNIT, A 2,560-SQUARE-FOOT COMMUNITY BUILDING, AND A 6,463 SQUARE-FOOT CHILDCARE CENTER LOCATED AT THE NORTHEAST CORNER OF CAMINO REAL AND LIMONITE AVENUE, AND NORTHEAST CORNER OF CAMINO REAL AND CANYON TERRACE DRIVE, ASSESSOR'S PARCEL NUMBERS 185-460-001, 185-470-001, 185-470-002; APPLICANT: WAKELAND HOUSING AND DEVELOPMENT CORPORATION

RECOMMENDATION

It is recommended that the City Council conduct a public hearing and adopt Resolution No. 2025-23, entitled:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF JURUPA VALLEY UPHOLDING THE PLANNING COMMISSION'S DENIAL OF CAMINO TERRACE APARTMENTS PROJECT (MA24164, SDP24074) AN 80-UNIT AFFORDABLE HOUSING PROJECT CONSISTING OF 28 SUPPORTIVE HOUSING UNITS, 51 AFFORDABLE HOUSING UNITS, ONE MANAGER'S UNIT, A 2,560 SQUARE FOOT COMMUNITY BUILDING, AND 6,463 SQUARE FOOT CHILD DAYCARE CENTER LOCATED ON THE NORTHEAST CORNER OF CAMINO REAL AND LIMONITE AVENUE, AND CAMINO REAL AND CANYON TERRACE DRIVE, AND MAKING A FINDING OF EXEMPTION UNDER CEQA GUIDELINES SECTION 15270 (MA25054, AP25001)

BACKGROUND

City Council Appeal Hearing (Continuance to August 7, 2025)

On June 26, 2025, the City Council held a duly noticed public hearing to consider the proposed project: an 80-unit affordable housing project consisting of 28 units supportive housing units, 51 affordable housing units, one manager's unit, a 2,560 square-foot

community building, and 6,463 square foot child daycare center located on the northeast corner of Camino Real and Limonite Avenue and south of Lakeside Drive. See Attachment 1 for the staff report from the June 26, 2025 meeting which contains background/history and analysis of the project. Public comments were received from the applicant and members of the public. During the hearing, the City Council identified the need for additional information related to project safety and noted the receipt of a second letter from the California Department of Housing and Community Development (HCD) regarding a potential notice of violation. To allow sufficient time to further evaluate the matter and ensure a comprehensive review of all relevant information, the City Council voted to continue the public hearing to a date certain of August 7, 2025, with the public hearing remaining open. Notably, the continued hearing scheduled for August 7, 2025, will be the third meeting out of the five-meeting limit permitted for housing projects pursuant to the Housing Accountability Act (HAA).

REQUESTED INFORMATION

The project has been evaluated in light of recent correspondence from the California Department of Housing and Community Development (HCD), including a follow-up letter that identifies additional considerations related to safety and compliance with state housing laws. The following summary outlines the outstanding items that require further information and assessment.

Notice of Potential Violation (NOPV) from HCD

The California Department of Housing and Community Development (HCD) issued a Notice of Potential Violation (NOPV) to the City of Jurupa Valley on June 24, 2025, regarding the Planning Commission's denial of this project.

HCD's letter states the City's denial was inconsistent with State housing laws. HCD determined that the City is required to provide legally sufficient findings under the HAA. Additionally, HCD clarified the requirement for onsite services, and how childcare can be considered under AB 2162 or applicable concessions under the State Density Bonus Law.

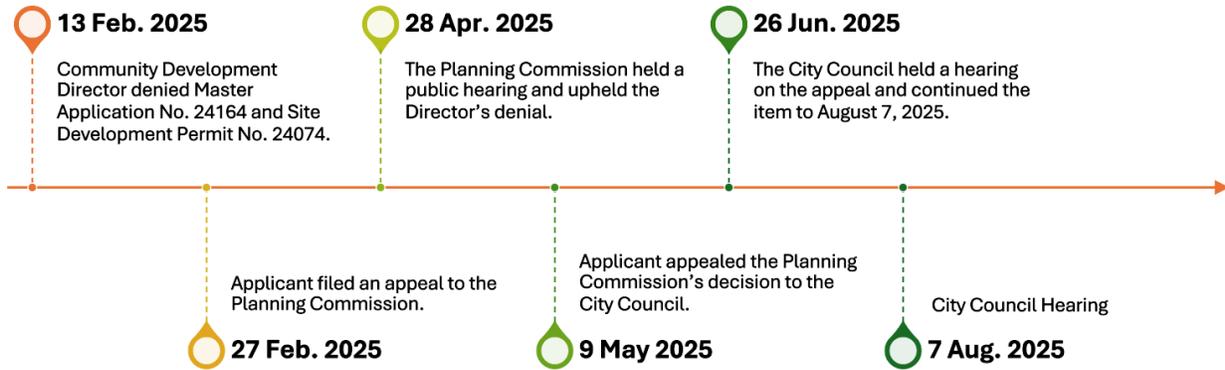
HCD stated that denial of the project may also violate the City's obligations under Affirmatively Furthering Fair Housing (AFFH), anti-discrimination laws (Gov. Code § 65008), and its own Housing Element commitments.

Right of Way Improvement and Safety Issues

The Planning Division has been in communication with Wakeland regarding potential solutions to address public health & safety concerns related to the lack of adequate right-of-way improvements. Discussions have included options for providing sidewalks along the project frontage to mitigate outstanding issues. The City has prepared and provided Wakeland with a scope of work and cost estimate for implementing the sidewalk improvements on certain streets. Wakeland is currently reviewing the proposal and considering the incorporation of these improvements into the project.

SUMMARY OF APPEALS AND PROPERTY OWNERSHIP

EXHIBIT NO. 1 - APPEAL TIMELINE



Community Development Director's Action

On February 13, 2025, the Community Development Director denied Master Application No. 24164 (MA24164) and Site Development Permit No. 24074 (SDP24074), issuing a formal Notice of Decision. The denial was based on the determination that the project did not qualify for ministerial approval as a supportive housing development under State law and failed to comply with the City's objective development standards. On February 27, 2025, the applicant, Wakeland Housing and Development Corporation, filed a timely appeal in accordance with Jurupa Valley Municipal Code (JVMC) Section 9.05.105, requesting review by the Planning Commission. This report provides an overview and analysis of the appeal, including the applicant's assertions, our responses, and the key findings that guided the Planning Commission's review and decision.

Planning Commission's Action

On April 28, 2025, the Planning Commission held a public hearing to consider Appeal (AP) No. AP25001 of the Community Development Director's ministerial denial of the Camino Terrace Apartments project. Following the close of public testimony, the Planning Commission adopted Resolution No. PC-2025-06, upholding the Director's denial. The Commission found that the project did not meet the requirements for ministerial approval under Government Code Section 65651 due to the absence of required onsite supportive services. The Planning Commission also determined that the project would result in specific, adverse impacts to public health and safety, particularly due to inadequate pedestrian connections between the two sites, insufficient external pedestrian connectivity, and the absence of ADA-compliant sidewalks along Camino Real. Furthermore, the Planning Commission found that the project was inconsistent with General Plan policies, applicable zoning regulations, ADA standards, and California Building Code requirements, including the failure to submit a Site Development Permit application for the proposed childcare center and deficiencies in accessible parking and pedestrian access. Based on these findings, the Planning Commission upheld the Director's denial of the project.

Applicant's Appeal of Planning Commission Action

On May 9, 2025, the applicant submitted an appeal of the Planning Commission's decision. The appeal states that the project complies with applicable State and local requirements, including those related to supportive housing eligibility, objective development standards, and the Housing Accountability Act. The applicant asserts that the project should be considered a by-right use and that the City's findings relied on subjective interpretations rather than objective criteria. The applicant requests that the City Council consider these points and approve the project.

Property Ownership

The property is owned by the Riverside County Housing Authority, which acquired it in 2016. The site is currently under an Exclusive Negotiation Agreement (ENA) with Wakeland Housing and Development Corporation. An ENA is a preliminary, non-binding agreement that grants Wakeland exclusive rights to negotiate with the Housing Authority for the potential development of the site. As part of the agreement, Wakeland is responsible for securing the necessary entitlements and approvals for any proposed development.

PROJECT DESCRIPTION

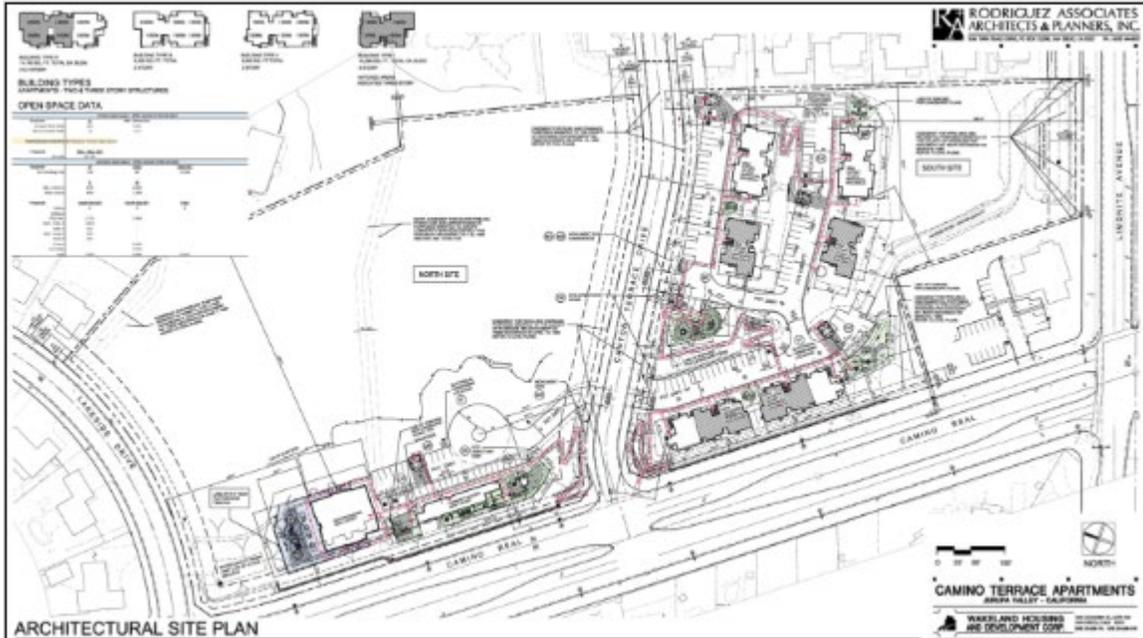
The proposed 80-unit affordable housing development is proposed on two parcels located along Camino Real and north of Limonite Avenue. The proposed project site, totaling 15.53 acres, is bisected by Canyon Terrace Drive, dividing it into two separate sites: the 5.88-acre southern portion (south of Canyon Terrace Drive), which includes six multi-story multifamily buildings with 28 supportive housing units, 51 affordable units, and one manager's unit; and the 9.65-acre northern portion (north of Canyon Terrace Drive), which contains a 2,560-square-foot community building with supportive services, laundry facilities, and outdoor spaces, along with a 6,463-square-foot child daycare center.

The southern portion includes unit sizes ranging from one- to three-bedroom layouts, outdoor amenities (such as a 2,791-square-foot play area and four patios), and 74 parking spaces (including EV and accessible spaces). The northern portion provides additional outdoor spaces, including a pet relief area, play area, and terrace, along with 31 parking spaces. The project features stucco walls, panel accents, and arched entrances. The Applicant sought approval as a ministerial supportive housing development under California Government Code Sections 65650 *et seq.* See Exhibit 2 Project Site for project location and Exhibit 3 Site Plan for proposed project.

EXHIBIT NO. 2 - PROJECT SITE



EXHIBIT NO. 3 - OVERALL SITE PLAN



APPLICATIONS FOR PROJECT

The proposed project requires several approvals. The Applicant sought approval under the ministerial approval process for qualifying supportive housing projects under California Government Code Section 65650 *et seq.*, as well as approval of a Density Bonus application.

Key Entitlements Required:

- **Site Development Permit – Supportive Housing Application (SDP)** – Required for the project’s approval as a by-right development under Government Code Section 65651 and 51 affordable housing units.
- **Density Bonus Application** – Incentives, concessions and waivers were requested under State Density Bonus Law to modify development standards, including setbacks, parking, and open space requirements.
- **Site Development Permit - Childcare facility** - Required but not applied for by the Applicant.

SUPPORTIVE HOUSING ELIGIBILITY AND STATE LAW REQUIREMENTS

Per the Applicant’s request, the application is being processed as a supportive housing project under California Government Code Section 65651, which allows qualifying developments to be approved ministerially in zones that permit multifamily housing. To qualify, the project must meet specific criteria, including:

- Dedicating 100% of its units (excluding the manager’s unit) to lower-income households;
- At least 25% of the units or 12 units, whichever is greater, are restricted to residents in supportive housing who meet criteria of the target population;
- A recorded affordability restriction for 55 years; and
- Providing on-site supportive services for use by the residents in the project.

To receive the ministerial approval process, State law requires that a certain amount of space be included in the project for on-site services [Gov. Code § 65651(a)(5)] and that the “plan for providing supportive services” must include “documentation demonstrating that supportive services will be provided on-site to residents in the project, as required by Section 65651” (Gov. Code § 65652). Additionally, supportive housing developments must comply with objective zoning and development standards that apply to other multifamily developments within the same zone.

Density Bonus Eligibility, Waivers, Incentives, and Concessions

As an affordable housing project, the development is eligible for various benefits under California Density Bonus Law (Government Code Section 65915). This eligibility grants projects that dedicate all units to lower-income households (excluding the manager’s unit), to an automatic 80% density bonus, allowing the developer to exceed the base zoning density. The applicant is not seeking an increase in density.

Additionally, the project qualifies for waivers of development standards if adherence to local development standards would physically preclude the project from achieving its

permitted density, including any density bonus. State Density Bonus Law also allows an applicant to obtain concessions or incentives, including regulatory incentives or concessions that result in identifiable and actual cost savings to a project. They are requesting waivers and concessions.

PROJECT LOCATION AND SURROUNDING AREA

The proposed project is located on a 15.53-acre site at the northeast corner of Camino Real and Limonite Avenue in the City of Jurupa Valley. The proposed project is bisected by Canyon Terrace Drive, a two lane road, creating a southern portion (5.88 acres) for residential development and a northern portion (9.65 acres) for community and childcare services.

The project site has a General Plan land use designation of Medium High Density Residential (MHDR), which allows for single-family attached and detached residences at a density of 5 to 8 dwelling units per acre. It is zoned R-3 (Multifamily Residential) and is part of the Mission De Anza Specific Plan (SP123), Planning Area 11, which permits multifamily development.

The surrounding area consists primarily of single-family residential neighborhoods, with commercial (e.g., 123 Smile Dental Care) and open space uses nearby. Additionally, the site is within Zone E of the Riverside Municipal Airport Influence Area, requiring compliance with additional safety regulations.

EXHIBIT NO. 6 - GENERAL PLAN LAND USE, MHDR (5-8 DU/AC)



EXHIBIT NO. 7 - ZONING, GENERAL RESIDENTIAL (R-3 ZONE)



At the time the project was submitted for processing and when the project was denied by the Community Development Director, the project site was designated as being in the Very High Fire Hazard Severity Zone. On March 24, 2025, the California Department of Forestry and Fire Protection released a new Fire Hazard Severity Zone map for Riverside County. The new map no longer identifies the project site as being located in any fire severity zone.

PROJECT DESIGN AND SITE LAYOUT

The proposed 80-unit affordable housing project is structured as a two-part development on a 15.53-acre site, with separate residential and community service areas. The southern portion (5.88 acres) consists of six multi-story multifamily residential buildings, including 28 supportive housing units, 51 affordable housing units, and one manager's unit.

The northern portion (9.65 acres) includes a 2,560-square-foot community building designated for supportive services, laundry facilities, and common areas, as well as a 6,463-square-foot child daycare center intended to serve residents and the surrounding community.

Outdoor features of the southern portion include a 2,791-square-foot play area and multiple landscaped patios. Outdoor features of the northern portion include a 1,374-square-foot pet relief area and a 2,900-square-foot recreational space.

Parking is located on both sites, with 74 spaces allocated to the residential area and 31 spaces near the community and childcare center, including accessible and electric vehicle parking.

The architectural design incorporates low-pitched gabled roofs, stucco walls, and panel accents, with a layout that includes a combination of indoor and outdoor spaces.

Summary Design and Site Layout Features:

- Southern Portion (5.88 acres) – Residential Area:
 - Buildings: Six multi-story multifamily buildings with 80 total units.
 - Unit Mix: 42 one-bedroom (593 sq. ft.), 20 two-bedroom (690–707 sq. ft.), and 18 three-bedroom (1,012 sq. ft.).
 - Outdoor Features:
 - 2,791 sq. ft. play area.
 - Four landscaped patios.
 - Parking: 74 spaces, including accessible and EV spaces.
- Northern Portion (9.65 acres) – Community and Childcare Facilities:
 - Community Building (2,560 sq. ft.):
 - Space for supportive services.
 - Shared laundry facilities.
 - Terrace (1,844 sq. ft.).
 - Child Daycare Center (6,463 sq. ft.):
 - Proposed to serve both residents and the broader community.
 - Outdoor Features:
 - 2,900 sq. ft. recreational area.
 - 1,374 sq. ft. pet relief area.
 - Parking: 31 spaces, including accessible and EV spaces.
- Architectural and Site Features:
 - Building Design: Low-pitched gabled roofs with stucco and panel accents.
 - Pedestrian Access: Internal walkways connecting residential units to amenities.
 - Landscaping: Tree-lined walkways and landscaped areas.
 - Lighting and Security: Common areas include lighting and other safety measures.

The project's design incorporates residential, community, and childcare components, with site features.

ACCESS, CIRCULATION, AND PARKING

The proposed project is comprised of two sites that are bisected by Canyon Terrace Drive, creating separate access points for the residential area to the south and the community building and childcare facilities to the north. Residents would need to cross Canyon Terrace Drive, a two lane road, to access the community services and daycare center.

EXHIBIT NO. 8 - SITE PHOTOS SEC CAMINO REAL AND CANYON TERRACE



EXHIBIT NO. 9 - SITE PHOTOS NEC CAMINO REAL AND CANYON TERRACE



EXHIBIT NO. 10 - EAST ON CAMINO REAL AND CANYON TERRACE



PUBLIC PEDESTRIAN ACCESS

The applicant is seeking waivers of some pedestrian access requirements, which affects connectivity between the northern and southern sites, as well as between the Project site and the public right-of-way. Specifically, the applicant requests pedestrian access to be provided as shown on project plans which does not include sidewalks, connection to sidewalks, physical separation between parking spaces and pedestrian paths.

While internal walkways are provided within each of the northern and southern portions of the project (respectively), there are no sidewalk improvements along Canyon Terrace Drive or Camino Real, and Wakeland is seeking a concession under State Density Bonus Law to avoid constructing sidewalk improvements.

The lack of sidewalk improvements would make external access to and from the site unsafe where a person needs to access the site using public transportation, by foot / mobility device, or using a stroller for children. The nearest bus stops are located west of Limonite Avenue (at the intersection of Limonite and Camino Real). Camino Real, is a four-lane road (two lanes in each direction), with a speed limit of 40 miles per hour. The situation is made even more dangerous by the fact that the Project is intended to provide housing and services for homeless veterans, some of whom may need to use mobility devices, and will need to travel with their mobility devices on the same road where cars are traveling at a high rate of speed.

The image shown below demonstrates the path an individual would need to take by foot or mobility device to reach the nearest bus stop. However, there is not an existing sidewalk on Camino Real and the Applicant has sought to avoid the City's requirement for installing a sidewalk there as a "incentive" under density bonus law.

A project narrative, dated September 2024, notes that pedestrian access may not fully comply with JVMC Section 9.240.545(B)(9) due to site constraints and the absence of adjacent sidewalks. The narrative indirectly acknowledges challenges and constraints and notes uncertainty about full compliance with JVMC standards due to lack of sidewalks

and a divided site. As a precaution, the applicant requests an incentive under State Density Bonus Law for relief from these requirements; however, staff has expressed health and safety concerns regarding the adequacy of the proposed pedestrian circulation.

EXHIBIT NO. 11 - NEAREST BUS STOPS



PARKING

The project includes a total of 106 parking spaces, distributed as 74 spaces in the residential area and 31 spaces near the community and childcare center, including electric vehicle (EV) and accessible spaces. The applicant is seeking a parking reduction under the State Density Bonus Law, which allows projects with 100% affordable units to reduce standard parking requirements. No parking spaces are being allocated to the 28 supportive housing units, while the parking requirements for the 51 affordable units are calculated based on SDBL (Gov Code Section 65915(p)) which require a total of 71 spaces.

A waiver is requested to allow parking within 30 feet of the public right-of-way, which is otherwise restricted by JVMC Section 9.240.120.B(6)(a)(i), due to site topography and feasibility concerns

LANDSCAPING, ARCHITECTURE, AND WALLS/FENCES

Landscaping and Private Open Space Modifications

The proposed landscaping plan includes tree plantings, open space areas, and recreational amenities. The applicant is requesting modifications to tree spacing requirements, as some areas do not meet the City's standard for trees planted at 30-foot intervals.

Additionally, the project does not fully comply with parking lot shading requirements, as it proposes less than the required shading coverage. The applicant is also requesting a waiver for private open space requirements, but the actual dimensions and usability of those spaces are noncompliant.

Landscaped areas include a 2,900-square-foot recreational space, a 1,374-square-foot pet relief area, and multiple patios, but the overall plan seeks to deviate from certain City landscaping regulations.

Architectural Style and Building Heights

The project consists of multi-story residential buildings on the southern site, with some structures reaching two stories and others three stories. The design incorporates low-pitched gabled roofs, stucco walls with panel accents, and symmetrical windows. The building massing is rectangular, with balconies on upper levels and arched entryways on ground floors. The community building and childcare center on the northern site feature similar stucco finishes and neutral color palettes.

EXHIBIT NO. 12 - RESIDENTIAL BUILDING AND COMMUNITY BUILDING



Walls and Retaining Structures

The project includes a substantial retaining wall along Camino Real, which reaches a height of 18 feet in certain sections. This height exceeds the City's standard for walls near the right-of-way, and the applicant is requesting a waiver to allow for this deviation.

Additionally, the project does not propose perimeter walls as required by the Municipal Code, particularly along property boundaries adjacent to commercial areas.

The project's perimeter wall along the commercial property line is unclear. While the applicant's narrative, dated September 2024, states that a 6-foot decorative block wall will be provided along the property boundary shared with the adjacent commercial use, the site and landscape plans, dated August 7, 2024, depict fence lines but do not indicate the required perimeter wall. As a result, it is not possible to confirm compliance with Jurupa Valley Municipal Code Section 9.240.545(B)(7)(b). Lack of clarity inhibits ministerial or by-right processing.

REQUESTED WAIVERS, INCENTIVES, AND CONCESSIONS

As an affordable housing project, the applicant is utilizing California Density Bonus Law (Government Code Section 65915) to request concessions/incentives and waivers to modify certain development standards and City requirements. Despite the City identifying that some of the City's development standards and Zoning Code requirements were not met, the applicant did not request a concession/incentive or waiver of some of these regulations for the City to evaluate, as summarized below. As such, the City retains the ability to enforce the applicable development standards and requirements.

EXHIBIT NO. 13 - WAIVERS, INCENTIVES, AND CONCESSIONS

Ref #	Category	Code Requirement	Requested Modification	Type (Waiver, Incentive, or Conc.)
1	Landscaping Sec. 9.240.545(B)(6)	Trees must be planted at 30-foot intervals	Tree spacing exceeds 30 feet in some areas	Waiver
2	Landscaping Shading Sec. 9.240.120(7)(e)(i)	Parking lots must have minimum 40% shading	Project proposes 29% shading	Waiver
3	Private Open Space Sec. 9.240.545.B(1)	115 sq. ft. (ground units), 75 sq. ft. (upper units)	Some balconies and patios are below minimum	Incentive
4	Parking Setback Sec. 9.240.120.B(6)(a)(i)	Parking must be 30 feet from right-of-way	Proposed setback is 17 feet 5 inches	Waiver
5	Pedestrian Access Sec. 9.240.545.B(9)	Sidewalks required to provide connection between on-site areas to public sidewalks	Internal Connections, ramps at the corner of Camino Real and Canyon Terrace, however no connection to sidewalks.	Incentive
6	Wall Height Sec. 9.240.545(B)(7)	Maximum height of 42 inches within 20 feet of a street	Retaining wall along Camino Real is 18 feet	Waiver
7	Perimeter Walls Along Commercial Property Sec. 9.240.545.(B)(7)	6-foot walls required along commercial properties	Unclear, narrative states compliance however plans do not demonstrate feature.	None
8	Unit Sizes Sec. 9.240.110	Minimum 750 sq. ft. per unit	42 one bedroom units that are 593 sq. ft. in size; 20 two bedroom units that are 690-707 sq. ft. in size	Waiver

Ref #	Category	Code Requirement	Requested Modification	Type (Waiver, Incentive, or Conc.)
9	Laundry Facilities Sec. 9.240.545.(B)(3)	Washer/dryer hookups required in units	Shared laundry facility instead of in-unit at 8 communal washers and dryers in lieu of 1 per unit.	Incentive
10	Parking Reduction Sec. 9.240.120. (B)(1)(b)(ii)	Comply with JV multifamily parking ratios.	Provide parking per Sec. 6591.5 Density Bonus Law provide 105 total.	Allowed parking ratios per Density Bonus
11	Accessible Parking Location Sec. 9.240.120(6)(c)(ii)	Accessible parking spaces must provide direct access to primary building entrances.	Accessible spaces do not have direct access to building entrances	None
12	Landscaped Berm Requirement Sec. 9.240.120(7)(f)(i)(j)	A 3-foot-high berm or planter with shrubbery is required around parking perimeters	Landscaped berms are not proposed in required locations	None
13	Accessory Storage Sec. 9.240.545(B)(4)(b)	60 cubic feet outside unit	0 cubic feet	Waiver

As part of its density bonus application, Wakeland did not submit a request to deviate from the requirement to provide accessible parking spaces with direct access to building entrances or from the landscaped berm requirements. As such, the project is required to comply with these requirements.

DIRECTOR'S ACTION ON PROJECT

On February 13, 2025, the Jurupa Valley Community Development Director issued a Notice of Decision denying Master Application No. 24164 (MA24164) and Site Development Permit No. 24074 (SDP24074). The denial was based on the project's failure to comply with objective development standards and State law requirements to be approved under the ministerial process for supportive housing projects.

The primary justifications for the denial include:

- **Failure to Meet State Law Requirements**

- To receive the ministerial approval process under state law, California Government Code Section 65651 requires supportive housing developments to provide a certain amount of **on-site supportive services**. The proposed project locates its supportive services on a separate parcel across the street, failing to meet the statutory requirement that services be provided on-site.
- While California Government Code Section 65651 does not define the term "on-site" in relation to supportive services, it does require that such services be provided on-site. In the absence of a specific statutory definition, the common-sense use of "on-site" is required especially when seniors and disable people will be required to cross a street to access the necessary

services intended by this provision. When residential units and supportive services are located on separate parcels divided by a public street, the services cannot reasonably be considered “on-site,” as they are not integrated with the housing component. To meet the intent of Section 65651, supportive services must actually be provided “on-site.”

- o To provide context on the issue, the applicant submitted a [Letter of Technical Assistance](#) from HCD related to a different project, intended to illustrate HCD’s position on “on-site” configuration. Staff has reviewed the letter and notes that, while HCD guidance encourages cities to treat parcels separated by a street as contiguous for purposes of Density Bonus Law eligibility, this interpretation does not extend to supportive housing requirements under Government Code Section 65651, which specifically requires supportive services to be provided “on-site.”
 - o HCD’s notice of potential violation stated that “AB2162 does not prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development” but does not cite to any authority for this statement.
 - o The applicant applied for a supportive housing project through a specific State law and was processed accordingly. Compliance with the supportive housing requirements set forth in Government Code Section 65651 *et seq.* is a requirement for any ministerial project approval. As the project does not provide onsite supportive services, it cannot be approved under the ministerial process identified in Government Code Sections 65650 *et seq.*, and therefore the project was denied.
- **Non-Compliance with Objective Zoning and Development Standards**
 - o Jurupa Valley Municipal Code Section 9.80.020(A)(25) provides that a childcare center is allowed in the R-3 zone with a Site Development Permit. The applicant did not submit an application for a Site Development Permit for the child care center and, therefore, the Project does not comply with the City’s zoning ordinance.
 - o The project does not meet multiple City zoning and development requirements, including:
 - Perimeter Walls – No required 6-foot wall along commercial property boundaries;
 - Parking Setback – Parking spaces encroach into required setback areas;
 - Pedestrian Access – No right-of-way improvements connecting the residential and supportive services parcels;
 - Landscaping and Shading Requirements – Does not meet tree spacing, shading, and landscaping berm requirements;
 - Obtaining a Site Development Permit approval for the child daycare center; and

- Accessible parking location requirements.
 - The project does not meet multiple objective development standards established by the City’s zoning and development code. While the State Density Bonus Law allows for waivers, concessions, and incentives to address such deviations, a request must be submitted to the City for review and approval. As part of its density bonus application, the applicant did not request to deviate from the requirement to provide accessible parking spaces with direct access to building entrances or from the landscaped berm requirements. Therefore, the City retains authority to require compliance with these objective standards.
- **Specific, Adverse Impact on Public Health and Safety**
 - The lack of sidewalks connecting the Project site to the public transportation stop at the corner of Camino Real and Limonite Avenue poses a specific, adverse impact on public health and safety, particularly for residents requiring accessible pathways or residents who are children. Residents traveling from the bus stop to the Project site will be forced to travel in the roadway along Camino Real, a four-lane highway with a speed limit of 40 miles per hour. This creates a dangerous situation for those residents, especially those that must use mobility devices and/or strollers. The City has a clear objective requirement that new development provide accessible pathways between a projects on the one hand and public streets / sidewalks and bus stops, on the other hand. Unless the applicant agrees to construct the sidewalk improvements, the Project does not meet this objective standard, which creates a clear impact on public health and safety.
- **Fire Safety**
 - At the time of the Community Development Director’s denial, the project site was located within a Very High Fire Hazard Severity Zone. However, updated 2025 Fire Hazard Severity Zone maps released by CAL FIRE no longer designate the site as being within any fire hazard zone.

Initial Fire Department comments required site plan modifications to meet fire access standards, including a 24-foot clear driveway width, maximum 14% grade per Guideline OFM-01A, and adequate tree clearance. However, on June 23, 2025, the Riverside County Fire Department reviewed the revised plans and issued preliminary fire conditions, confirming that no further comments remain at the land use permit stage.

The denial of the project was based on these deficiencies, particularly its failure to meet the qualifications for ministerial approval of a supportive housing project and its non-compliance with objective City development standards. The applicant appealed to the Community Development Director’s decision within 15 calendar days, in accordance with the City’s procedures.

Because the Applicant sought approval under the ministerial process for supportive housing created by State law and the project consists of more than 50 units, the City was required to process the application within 120 days, as mandated by Government Code

Section 65651. The Notice of Decision denying the project was issued on February 13, 2025, ensuring compliance with the 120-day statutory deadline.

Prior to the denial, the city provided several comment letters, first addressed the completeness of the application and then outlined the project's inconsistencies with the City's standards. An incompleteness letter was issued on July 19, 2024, followed by a letter on October 16, 2024, advising the applicant that the project application was deemed complete. On November 15, 2024, the City issued a Zoning Compatibility Letter, which identified the project's inconsistencies with the City's objective standards. These included the absence of onsite, or accessible, supportive services as required by State law, the lack of a site development permit application for the childcare center, the lack of right-of-way improvements and pedestrian connectivity, missing perimeter walls, deficiencies in pedestrian access, and landscaping non-compliance.

APPEAL OF DIRECTOR'S ACTION TO PLANNING COMMISSION

On February 27, 2025, Wakeland submitted an appeal of the Director's denial of the project. The Community Development Department, Engineering and Public Works Department, and City Attorney's Office have reviewed the appeal and provide the following comments on issues relevant to the project denial:

- **Pedestrian Access to and from Public Streets** – While Wakeland is proposing a path-of-travel across Canyon Terrace, Wakeland is seeking a concession to avoid constructing any sidewalk improvements along Camino Real or Canyon Terrace which front the Project site. The Mobility Element of the General Plan requires that all new developments construct sidewalk improvements. Specifically, Mobility Element Policy ME 2.11 states that the City “[r]equire[s] street improvements as a condition of new developments, including undergrounding of utility lines, installation of fiber optic cable and other utilities, sidewalk, curb, gutter and street pave-out, bicycle and equestrian facilities, street lighting (where appropriate), street trees and landscaping.” ME 3.21 states that the city “[r]equire[s] safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.” ME 8.10 states that “Developers shall be responsible for right-of-way dedication and improvements that provide access to and enhance new developments. Improvements include street construction or widening, new paving, frontage improvements like curb, gutter, sidewalks, street trees, trails and parkways, installation of traffic signals, pavement markings and annunciators, and other facilities needed for the safe and efficient movement of pedestrians, bicyclists, equestrians, and motor vehicles.” The Project is not meeting these objective standards set forth in the General Plan.

Moreover, the Americans with Disabilities Act (“ADA”) mandates that public facilities, including sidewalks, must be accessible to individuals with disabilities. The Project does not comply with a number of ADA regulations and standards. According to ADA Standards for Accessible Design Standards, Section 206.2.1, at least one accessible route must be provided within the site to accessible facility entrances from these site arrival points, where provided: (1) accessible parking and accessible passenger loading zones, (2) public streets and sidewalks, and (3) each public transportation stop. Wakeland is seeking a concession to not construct

any sidewalks adjacent to the Project site. This results in there being no accessible unobstructed route to the Project site and, therefore, none of the buildings are accessible from a public street, a public sidewalk, or public transportation stop. The only way to get to the site is by driving, which prevents an individual who uses a mobility device from having an accessible route between the public streets and sidewalks in nearby neighborhoods or from the public bus stops.

The Project also does not comply with the requirements set forth in California Building Code, Title 24 of the California Code of Regulations Section 1114B.1.2, which states that “when a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7, and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances, and between the building and the public way. . . At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones, and public streets or sidewalks, to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility. An accessible route shall connect at least one accessible entrance of each accessible dwelling unit with those exterior and interior spaces and facilities that serve the accessible dwelling unit. Where more than one route of travel is provided, all routes shall be accessible.”

Moreover, California Building Code, Title 24 of the California Code of Regulations Section 11B-206.2.1 provides that at least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger drop-off and loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. The Project is not providing an accessible route from a public transportation stop or from any public street or sidewalk to any of the buildings on the Project site.

Compliance with these requirements are essential to ensuring safe and accessible pathways for individuals who need to access the various buildings on site including the housing on the south site, the supportive housing services, child care, and laundry facilities on the north site, as well as transit services at the intersection of Camino Real and Limonite Avenue. As no sidewalks are proposed, the Project fails to meet the ADA and California Building Code requirements set forth above.

The Mobility Element of the General Plan requires the construction of sidewalks and Jurupa Valley Municipal Code Section 9.240.545(B)(9) requires pedestrian access from public streets. In addition, the ADA and CBC require accessible routes of travel. The lack of connectivity and an accessible route of travel creates a public safety issue, especially for residents with mobility needs, and supports the denial under applicable standards and the Housing Accountability Act.

HCD's notice of potential violation found that the City had not made the requisite findings for denial and that the above referenced General Plan policies, Building Code requirements, and ADA requirements were not a basis for the denial of the project.

- **Sidewalk and Infrastructure Requirements** – Wakeland argues that the lack of sidewalks does not create a specific, adverse impact on public health and safety, and that the city did not provide substantial evidence to justify requiring them. Not having sidewalks will force pedestrians, including children and people using mobility devices to travel in the roadway along Camino Real to access the closest bus stop located on the corner of Camino Real and Limonite Avenue. This is specifically concerning motorists traveling at high speeds along Camino Real. The speed limit on Camino Real is 40 miles per hour. The absence of sidewalks would create an unsafe environment for pedestrians coming from nearby streets such as Limonite Avenue, Canyon Terrace Drive, and Lakeside Drive. The only way to mitigate this danger is for the project to construct ADA-compliant sidewalks so that pedestrians and persons using mobility devices to travel from the bus stops to the Project site (and from the Project site to the bus stops), can travel on a sidewalk rather than in the vehicle right-of-way on a busy street.
- HCD's notice of potential violation states that the City can condition the approval of the project on the construction of certain sidewalk improvements.
- **Supportive Housing Eligibility** – Wakeland claims the City subjectively interpreted State law by determining that on-site supportive services must be on the same parcel as the residential units. There is no authority to support Wakeland's position that onsite supportive services may be located across the street from the residential component of the project. The city has not found any case interpreting Government Code section 65650 *et seq.* as providing that "on-site" services can be provided on a parcel across a two-lane street.

HCD's notice of potential violation does not cite to any case law to support its position that on-site can be provided on a parcel that is bisected by a two-lane street.

- **Ministerial By-Right Approval Project for Multifamily Housing Projects** - Wakeland claims that the project should be processed ministerially, as the City's Housing Element states that multifamily housing with at least 10% affordable units qualifies for by-right approval. Wakeland did not, however, apply for a multifamily housing project but rather is seeking approval of a supportive housing project through the ministerial process created by Government Code Section 65650 *et seq.* Therefore, this argument is not relevant to whether the Community Development Director properly denied Wakeland's application for a ministerial approval of a supportive housing project with a childcare center.

On April 28, 2025, the Planning Commission held a public hearing on the matter and following the close of public testimony, the Planning Commission adopted Resolution No. PC-2025-06, upholding the Director's denial of the project.

APPEAL OF PLANNING COMMISSION ACTION TO CITY COUNCIL

On May 9, 2025, Wakeland submitted an appeal of the April 28, 2025, Planning Commission decision. The Community Development Department, Engineering and Public Works Department, and City Attorney's Office have reviewed the appeal request and provided the following comments on issues relevant to the project denial:

- **Appeal Comment:** The applicant argues the project meets all eligibility requirements for ministerial approval under Government Code Section 65651 and JVMC Section 9.240.555. The City's denial relied on a subjective interpretation of "onsite supportive services" due to the site being bisected by Canyon Terrace Drive. The applicant contends this interpretation is inconsistent with objective standards and state law
 - **Response:** The physical separation of housing and services by a public street (Canyon Terrace Drive) raises valid questions of integration. There is no explicit statutory provision that provides that two separate parcels separated by a road qualify as a single "site" under Government Code Section 65651. While the applicant asserts the City's interpretation is subjective, the determination is based on an objective reading of the statutory requirement that supportive services be provided "on site" and reflects a reasonable application of state law in the absence of clear legislative or judicial guidance to the contrary. HCD's notice of potential violation to the City states that "[Government Code Section 65651] does not prohibit a site that is divided by a roadway from serving as a single permanent supportive housing development" but it is equally true that there is nothing in Government Code Section 65651 that would compel the City to make a finding that providing supportive housing services across a two lane street qualifies as providing supportive housing "on-site."
- **Appeal Comment:** The applicant argues that the project complies with all objective zoning standards, ADA, and CBC requirements or is eligible for waivers and concessions under SDBL. The claim is that sidewalk requirements cited by the city are off-site obligations not imposed by objective standards applicable to private developers.
 - **Response:** The General Plan's Mobility Element requires the construction of sidewalk improvements. Moreover, Jurupa Valley Municipal Code Section 9.240.545(B)(9) requires pedestrian access from public streets. The ADA and CBC require accessible routes from public rights-of-way and transit stops to building entrances. The project does not provide an accessible connection from Camino Real or Limonite Avenue. The applicant claims that such improvements are not their responsibility but ignores that these requirements are set forth in objective standards to provide basic accessibility within and to the project site. The applicant is currently considering a proposal by the City to construct certain sidewalk improvements.

- **Appeal Comment:** The applicant asserts that the project complies with CBC and ADA accessibility requirements within the boundaries of the site, including an internal 5-foot-wide ADA-compliant pedestrian path and proposed ADA curb ramps at the intersection of Canyon Terrace and Camino Real. They contend that off-site improvements (such as sidewalks along Camino Real) fall outside the Planning Division’s purview and should not be used as grounds for denying the project based on zoning consistency. They argue that any unresolved accessibility issues could be addressed during permitting and do not justify denial at the entitlement stage.
 - **Response:** In compliance with the Housing Accountability Act (HAA), the city may deny the project due to the lack of accessible pedestrian connections between the site and surrounding public infrastructure, particularly along Camino Real, as this will have a specific, adverse public health and safety impact that cannot otherwise be mitigated. The absence of offsite ADA-compliant access disproportionately affects the intended supportive housing population, including residents with disabilities. Additionally, the review process includes evaluating whether the project meets objective development standards and does not present unmitigable health and safety concerns. Therefore, the Community Development Director and the Planning Commission had the authority to consider these deficiencies in their decision to deny the ministerial approval of the project.
- **Appeal Comment:** The applicant states that the City’s findings include “clear misreadings” of the Americans with Disabilities Act (ADA) and the California Building Code (CBC).
 - **Response:** The city respectfully disagrees with the applicant’s assertion that it “clearly misread” the ADA and CBC. The City’s concern is that the project’s configuration does not ensure access between the housing units and supportive services. For a supportive housing project serving individuals with disabilities, both internal site circulation and external pedestrian connectivity are essential to achieving physical and practical integration. The City’s interpretation has been carefully reviewed and validated by City staff, confirming its consistency with applicable Municipal Code provisions and its alignment with objective accessibility and zoning standards.
- **Appeal Comment:** The applicant contends that the City’s General Plan policies requiring frontage improvements such as sidewalks are not enforceable on private development. As such, the City cannot rely on these policies as objective standards to require off-site improvements or to deny the project.
 - **Response:** The General Plan Mobility Element Policy ME 2.11 expressly “[r]equire[s] street improvements as a condition of new developments, including undergrounding of utility lines, installation of fiber optic cable and other utilities, sidewalk, curb, gutter and street pave-out, bicycle and equestrian facilities, street lighting (where appropriate), street trees and landscaping.” ME 3.21 states that the city “[r]equire[s] safe pedestrian

walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.” ME 8.10 states that “Developers shall be responsible for right-of-way dedication and improvements that provide access to and enhance new developments. Improvements include street construction or widening, new paving, frontage improvements like curb, gutter, sidewalks, street trees, trails and parkways, installation of traffic signals, pavement.” This language is objective and mandatory. The applicant does not cite any authority that stands for the proposition that the City cannot impose the objective standards set forth in its General Plan.

Moreover, the City’s zoning code includes codified, objective development standards that are also enforceable on private development. For example, JVMC Section 9.240.545(B)(9) requires pedestrian connections from residential units to public sidewalks and other site elements. The lack of ADA-compliant sidewalk connectivity along Camino Real and inadequate site integration with the public right-of-way prevent the project from meeting these objective standards. Therefore, the City’s denial of the project was based on specific, objective standards that apply to ministerial housing projects.

- **Appeal Comment:** The applicant cites HCD’s Notice of Potential Violation (dated April 24, 2025) to argue that the City’s denial is inconsistent with state law. They contend that HCD has confirmed a site divided by a roadway may still qualify as a single supportive housing development under Government Code Section 65651, and that denial based on the location of supportive services or ADA access is improper.
 - **Response:** The City acknowledges HCD’s Notice of Potential Violation but maintains that the City’s interpretation of “on-site” supportive services under Government Code Section 65651 is a reasonable, objective application of the law as further discussed above.
- **Appeal Comment:** The City failed to meet the HAA’s threshold for denial, which requires a preponderance of evidence showing a specific, adverse impact on public health and safety that cannot be mitigated. The applicant asserts the City’s cited concerns (e.g., lack of sidewalk) are existing conditions or speculative impacts—not specific adverse impacts caused by the project.
 - **Response:** The city identified lack of access, particularly for residents with mobility devices, and failure to provide pedestrian safety improvements along Camino Real. These are legitimate health and safety concerns under the HAA (Gov. Code § 65589.5(d)(2)), especially when no mitigation (e.g., sidewalks) is proposed. The applicant’s argument that the conditions are “existing” may not overcome the fact that new residents will rely on unsafe, non-accessible infrastructure. Responding to Fire comments at this stage of review is also important since Fire comment letters have identified revisions that would require changes to site plan exhibits. To focus on the HAA Standards, the City’s findings focus on the following:

- **Specific Impact:** The project will house 80 new residents, including formerly homeless veterans and individuals with disabilities, who will rely on unsafe, non-ADA-compliant infrastructure for daily mobility and access to services.
 - **Adverse Health and Safety Risk:** The lack of sidewalks and safe crossings exposes residents to vehicle conflicts along Camino Real with no dedicated pedestrian pathway.
 - **Lack of Mitigation:** The applicant has not proposed any off-site improvements (e.g., sidewalks, curb ramps, lighting) to address these access deficiencies.
 - **Cumulative Risk:** The interaction between the project and existing infrastructure deficiencies creates a foreseeable and substantial health and safety hazard that cannot be mitigated through on-site design alone.
- **Appeal Comment:** Wakeland contends that concerns raised by the City do not warrant denial and asserts that any unresolved issues could have been addressed through conditions of approval rather than rejecting the project outright.
 - **Response:** Wakeland's position is acknowledged but the City maintains that the project, as submitted, did not demonstrate compliance with key objective standards that impact the design of the site. While the City is open to resolving such issues through conditions of approval, no specific revisions or commitments were provided at the time of decision.
 - **Appeal Comment:** The City's Housing Element commits to by-right approval of multi-family and supportive housing projects on the site, but the Zoning Code still requires a discretionary Site Development Permit (SDP), creating a barrier to approval. The city is also alleged to be out of compliance with Housing Element law due to delayed rezoning and failure to implement SB 35 streamlining.
 - **Response:** If the project was determined to be eligible for by-right processing, it would remain subject to applicable objective development standards. City staff has identified several areas where the current project design does not appear to meet these standards, and these issues are not automatically resolved through a claim of by-right eligibility.

Additionally, while the City continues to work toward Housing Element implementation, individual projects must still be reviewed based on the objective standards and laws in effect at the time of application. The City's review and denial of this project was based on those applicable objective standards. Moreover, while the applicant applied for a SB 35 project in 2021, that project was deemed ineligible for SB 35 streamlining. The current application that is being appealed is not a SB 35 project.
 - **Appeal Comment:** The appeal argues that denial of the project undermines the City's ability to meet its Regional Housing Needs Allocation (RHNA), especially for lower income households. The project site is identified in multiple Housing

Elements as a suitable site for affordable housing, and the project would help address the City's significant RHNA shortfall.

- o **City Response:** The City's denial of the project does not undermine its ability to meet its RHNA. While the project site was identified in prior Housing Elements, it is currently designated for above-moderate income units in the City's 6th Cycle inventory and is not relied upon to meet lower-income RHNA targets. The City has demonstrated surplus capacity for lower-income housing on other suitable sites, and denial of one project does not constitute noncompliance with RHNA.

ENVIRONMENTAL REVIEW (CEQA COMPLIANCE)

The project is exempt from environmental review under the California Environmental Quality Act (CEQA) because, pursuant to CEQA Guidelines Section 15270, CEQA does not apply to projects which a public agency rejects or disapproves. Nevertheless, the applicant has submitted environmental technical studies for the record, including a Biological Resources Report (dated May 30, 2024), a Cultural Resources Report (dated October 2022), a Fire Protection Plan (dated March 17, 2022), and an Airport Land Use Commission Director's Determination (dated December 30, 2024).

NOTICING REQUIREMENTS

Public hearing notices were sent to surrounding property owners within 1,000 feet from the boundaries of the project site on June 16, 2025. Additionally, legal advertisements were published in the Press Enterprise on Sunday, June 16, 2025. At this time, no additional responses have been received. Because the public hearing held on June 26, 2025, was continued to a certain date of August 7, 2025, no additional mailed or published notice was required.

FINANCIAL IMPACT

The applicant paid for the processing of the project appeal. It will have no effect on City costs or revenues.

ALTERNATIVES

1. *Recommended Action:* Adopt Resolution No. 2025-100 to uphold the Planning Commission's decision to affirm the ministerial denial of Camino Terrace Apartments (Master Application No. 24164, Site Development Permit No. 24074), an 80-unit affordable housing project located at the southeast corner of Camino Real and Canyon Terrace Drive, and deny the Applicant's appeal; or
2. Direct staff to prepare a resolution that grants the appeal of the Planning Commission's decision approving the proposed Camino Terrace Apartments; the resolution will be returned for City Council consideration at a future date.

Prepared by:



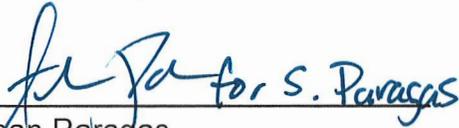
Joe Perez
Assistant City Manager/ Community
Development Director

Submitted by:



Rod Butler
City Manager

Reviewed by:



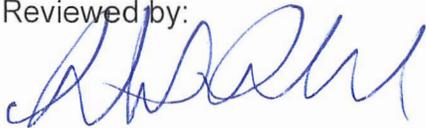
Susan Paragas
Finance Director

Reviewed by:



Peter Thorson
City Attorney

Reviewed by:



Michael Flad
Assistant City Manager

ATTACHMENTS

1. City Council Resolution
2. Adopted Resolution No. PC-2025-06
3. Project Plan Set (Architectural, Civil, and Landscape Plans)
4. Appeal of Director's Action to Planning Commission
5. Appeal of Planning Commission Decision to City Council
6. Project Review Correspondences
7. Letter from Housing and Community Development (HCD) (June 24, 2025)