

February 16, 2026

Complaint to U.S. Department of Housing and Urban Development – Office of Inspector General

Subject: Alleged Waste of Public Funds, Abuse of Authority, and Regulatory Noncompliance – Camino Terrace Project, Jurupa Valley, CA

Submitted by: Lukasz Czerwinski, on behalf of residents of Canyon Terrace Drive and adjacent communities

To Whom It May Concern:

U.S. Department of Housing and Urban Development

Dear Officer,

On behalf of the residents of Canyon Terrace Drive and the adjacent communities in Jurupa Valley, California, we respectfully submit this formal complaint regarding what we believe to be an abuse of authority and improper conduct by the Housing Authority of the County of Riverside (HACR) and Wakeland Housing and Development Corporation (Wakeland) in connection with the proposed Camino Terrace Apartments project.

Since June 2022, Riverside County has entered into multiple exclusive partnership agreements with Wakeland to develop this project. Throughout this process, residents have observed actions that raise serious concerns regarding zoning compliance, monopolistic practices, fire safety, public safety, transparency, and the responsible use of taxpayer funds.

We respectfully request HUD’s review and guidance on the following matters:

1. Zoning and Legal Compliance Concerns

The project has been presented as supportive housing under California Government Code § 65651 and AB 2162. However, AB 2162 permits supportive housing “by right” only in zones where multifamily or mixed-use development is already permitted.

The subject parcels (APNs 185-470-001, 185-470-002, and 185-460-001) are designated Medium High Density Residential (MHDR) under Riverside County Development Plans. This designation permits:

- Single-family attached and detached residences
- Density of 5–8 dwelling units per acre

The proposed multi-story apartment buildings do not meet the definition of single-family attached residences (which must sit on individual lots, have separate deeds, and contain no units above or below). Additionally, MHDR limits building height to 40 feet.

Accordingly, it appears the proposed development does not conform to existing zoning requirements, and the application of AB 2162 may be legally improper.

2. Exclusive and Anti-Competitive Practices

Residents are concerned about the lack of transparency and competitive process:

- HACR has repeatedly renewed exclusive negotiation agreements with Wakeland since 2022.
- HACR proposes donating approximately \$7.8 million worth of public land to Wakeland.
- No public bid process has been conducted since 2022.
- Other affordable housing developers and contractors have not been allowed to propose alternative development concepts.
- HACR has declined consideration of alternatives, including potential direct acquisition of the parcels by the City of Jurupa Valley.

These actions raise concerns regarding monopolistic practices and the proper stewardship of public assets.

3. Fire Hazard Reclassification Concerns

For decades, our neighborhood was classified as a High Fire Hazard Severity Zone (FHSZ). In March 2025, updated maps reclassified the area from “High” to “No Hazard.”

This downgrade raises serious questions:

- Adjacent hillside communities (Lakeside Drive, Ridgeline Drive, Sundance Drive, and Pebblewood Court) remain designated “Very High.”
- These neighborhoods share substantially similar terrain, vegetation, slope gradients, and fire history.
- Canyon Terrace Drive is positioned on a southwestern-facing slope, historically exposed to intensified Santa Ana wind patterns and wind tunneling effects.

- CAL FIRE's public Fire Perimeter Map continues to depict the subject parcels within a High Fire Hazard perimeter.
- Southern California Edison continues to treat our area as high fire risk, with more than 14 Public Safety Power Shutoff (PSPS) events in the past two years, including a nearly week-long outage in 2025.
- A formal appeal has been submitted to Riverside County Fire Chief Robert Fish requesting reassessment.

We respectfully question whether the FHSZ downgrade was conducted with sufficient environmental and wind-pattern analysis.

4. Public Safety and ADA Concerns

The proposed development raises serious safety issues:

- The project would add new entry and exit points onto Canyon Terrace Drive, a cul-de-sac with only one emergency access route via Camino Real.
- The proposed access points are located on a 16% grade slope, which presents significant emergency braking concerns and may conflict with state highway design standards.
- ADA regulations require accessible routes to maintain a maximum 5% running slope; the proposed 16% grade raises compliance concerns.
- Parking appears insufficient, likely forcing overflow parking onto narrow public streets and creating visibility and evacuation hazards.

Given wildfire risk and evacuation realities in hillside communities, safe ingress and egress are critical.

5. One-Sided State Intervention

On April 24, 2025, the California Business, Consumer Services and Housing Agency issued the City of Jurupa Valley a "Notice of Potential Violation," heavily citing AB 2162 and other housing statutes.

However, the notice does not acknowledge:

- Zoning limitations of the subject parcels.

- Legitimate safety and fire risk concerns raised by the City and residents.
- The statutory requirement that AB 2162 applies only where multifamily housing is permitted.

We are concerned that lobbying efforts may have presented an incomplete narrative to State authorities.

6. Use of Public Funds and Nonprofit Accountability

The Camino Terrace proposal provides approximately 49% affordable/low-income units, with 51% of units rented at other rates.

Despite Wakeland's nonprofit status, publicly available financial data reflects:

- 2024 Revenue: ~\$22.9M
- 2024 Expenses: ~\$13M
- 2024 Assets: ~\$109M
- 2024 Liabilities: ~\$44.7M

Revenue sources include program services (~\$17.5M), contributions (~\$3.9M), and investment income (~\$940k).

Given these figures, residents question:

- The necessity of a \$7.8M land donation.
 - The additional \$22.6M in public funds previously awarded.
 - Whether adequate reinvestment by Wakeland itself is being required.
 - Whether the public interest is being sufficiently protected.
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Request for HUD Guidance

We respectfully request that the U.S. Department of Housing and Urban Development:

1. Review whether the project's reliance on AB 2162 is legally appropriate given zoning restrictions.
2. Evaluate whether HACR's exclusive agreements and land conveyance practices comply with federal housing and fair competition standards.

3. Provide guidance to the City of Jurupa Valley regarding its legal protections and obligations.
4. Ensure that public safety, ADA compliance, and wildfire risk mitigation standards are fully addressed.

The City of Jurupa Valley does not have the financial capacity to engage in protracted litigation against a well-funded developer or its own County. We support responsible housing development, but not at the expense of safety, transparency, and lawful process.

We do not oppose development of these parcels. We simply ask that any development be legally compliant, competitively procured, fiscally responsible, and safe for both current and future residents.

Respectfully submitted,

Lukasz Czerwinski

On behalf of the Residents of Canyon Terrace Drive and Adjacent Communities

HUD OFFICE OF INSPECTOR GENERAL – HOTLINE SUBMISSION

Subject: Alleged Waste of Public Funds, Abuse of Authority, and Regulatory Circumvention – Camino Terrace Project, Jurupa Valley, CA

Date: February 16, 2026

Submitted by: Lukasz Czerwinski (on behalf of residents of Canyon Terrace Drive and adjacent communities, Jurupa Valley, CA)

I respectfully request that HUD Office of Inspector General review potential waste of public funds, abuse of authority, and improper procurement practices involving the Housing Authority of the County of Riverside (HACR) and Wakeland Housing and Development Corporation (Wakeland) in connection with the proposed Camino Terrace Apartments project (APNs 185-470-001, 185-470-002, 185-460-001) in Jurupa Valley, California.

Key Concerns:

1. Potential Misapplication of Housing Law

The project is being advanced under California Government Code § 65651 and AB 2162 (supportive housing “by right”). However, AB 2162 applies only in zones permitting multifamily or mixed-use development. The subject parcels are designated Medium High Density Residential (MHDR), permitting single-family attached/detached residences (5–8 units per acre). The proposed multi-story apartment buildings appear inconsistent with this zoning classification. We request review of whether federal funds are being used to support a project that may not comply with applicable land-use requirements.

2. Exclusive Agreements and Lack of Competitive Process

Since 2022, HACR has maintained exclusive negotiation agreements with Wakeland without conducting an open public bid process. HACR is proposing to convey approximately \$7.8 million worth of public land to Wakeland via grant deed. No alternative developers have been permitted to compete or submit proposals. These actions raise concerns regarding fair competition, stewardship of public assets, and potential preferential treatment where public funds are involved.

3. Fire Hazard and Safety Concerns

The site was historically classified as a High Fire Hazard Severity Zone until March 2025. Adjacent hillside communities remain classified as “Very High.” CAL FIRE perimeter maps and repeated Public Safety Power Shutoff (PSPS) events by Southern California Edison indicate continued wildfire risk. The project proposes additional access points onto a cul-de-sac with a 16% grade slope and only one evacuation route, raising serious emergency access and ADA compliance concerns.

4. Public Funding and Financial Oversight

The project has reportedly received approximately \$22.6 million in public funding and is proposed to receive an additional \$7.8 million land conveyance. Wakeland’s 2024 publicly reported financials

reflect approximately \$22.9M in revenue, \$13M in expenses, and \$109M in assets. Only 49% of the proposed units are designated affordable. Residents question whether the level of public subsidy is necessary and whether taxpayer funds are being responsibly allocated.

Request for HUD OIG Review

We respectfully request that HUD OIG evaluate:

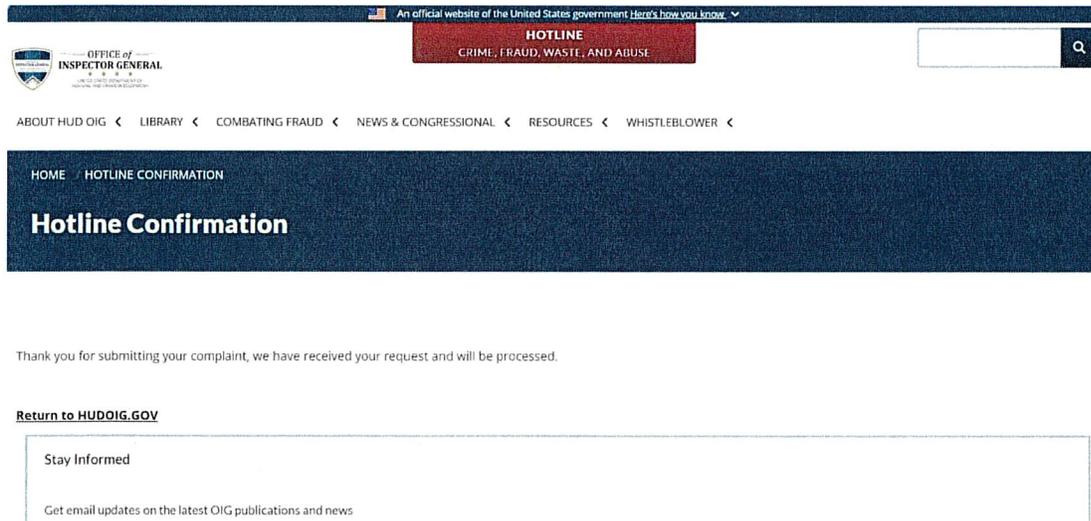
- Whether federal housing funds are being used in compliance with procurement, competition, and program requirements.
- Whether the land conveyance and exclusive negotiation practices constitute waste or improper preferential treatment.
- Whether safety, ADA, and wildfire risk considerations meet applicable standards when federal funding is implicated.

Residents support responsible affordable housing development. We seek only assurance that public funds are protected, procurement is fair, and safety standards are upheld.

Respectfully submitted,

Lukasz Czerwinski

On behalf of Residents of Canyon Terrace Drive and Adjacent Communities
Jurupa Valley, California



The screenshot shows the HUD OIG website's 'Hotline Confirmation' page. At the top, there is a navigation bar with the HUD OIG logo, the text 'OFFICE of INSPECTOR GENERAL', and a 'HOTLINE' button for 'CRIME, FRAUD, WASTE, AND ABUSE'. Below the navigation bar is a search bar and a menu with links: 'ABOUT HUD OIG', 'LIBRARY', 'COMBATING FRAUD', 'NEWS & CONGRESSIONAL', 'RESOURCES', and 'WHISTLEBLOWER'. The main content area has a dark blue header with 'HOME / HOTLINE CONFIRMATION' and a large 'Hotline Confirmation' title. Below the title, a message reads: 'Thank you for submitting your complaint, we have received your request and will be processed.' At the bottom, there is a link 'Return to HUDOIG.GOV' and a 'Stay Informed' section with a text input field and a button to 'Get email updates on the latest OIG publications and news'.