

INTAKE FORM / HOUSING

Civil Rights Department



If you would like CRD to consider your complaint for investigation, complete this form and email it to: contact.center@calcivilrights.ca.gov or mail it to: 651 Bannon Street, Suite 200, Sacramento, CA 95811. You may also submit an intake form using our online system at ccrs.civilrights.ca.gov.

The completion and submission of this Intake Form will initiate an intake interview with a Civil Rights Department (CRD) representative. The Intake Form is not a filed complaint. The CRD representative will determine if a formal complaint can be accepted for investigation. Your submission of this document acknowledges that you have read and agree to the CRD's Privacy Policy.

COMPLAINANT (YOUR INFORMATION)

Name: ACLU of Southern California

Phone: (213) 977-5278 Email: KRogers@ACLUSoCal.org

Address: P.O. Box 811370

City: Los Angeles State: CA Zip: 90081

Do you need an interpreter during the complaint process? Yes No

If yes, indicate language: _____

Do you require disability-related accommodations when interacting with CRD? Yes No

Select all that apply: ASL/Video Remote Interpreting Video Interview
 CART Services Questions in advance
 Other (specify): _____

RESPONDENT (PERSON/BUSINESS YOU'RE FILING AGAINST)

Name: City of Riverside Phone: (951) 826-5567

Title: _____ Email: _____

Address: 3750 University Ave , Suite 250

City: Riverside State: CA Zip: 92501

CO-RESPONDENT (OPTIONAL)

Name: _____ Phone: _____

Title: _____ Email: _____

Address: _____

City: _____ State: _____ Zip: _____

■ **ALLEGATION**

First Date of Harm: 01/13/2026 Last Date of Harm: _____

Full Property Address Where Violation Occurred:

Address: 1590 University Ave

City: Riverside State: CA Zip: 92507

Number of Units in the Housing Complex: 114

Property Description: Apartment Vacant Lot
 House Condominium
 Other (please specify): Trailer Space or Mobile Home
Motel Conversion to Permanent Supportive Housing

Full Name and Age of All Children in the Household Under the Age of 18:

I allege that I experienced: Discrimination Harassment

BECAUSE OF MY ACTUAL OR PERCEIVED:

- Ancestry
- Association with a member of a protected class
- Color
- Disability (physical, intellectual/developmental, mental health/psychiatric)
- Familial Status (children)
- Gender Identity or Expression
- Genetic Information or Characteristic
- Marital Status
- Military and Veteran Status
- National Origin (includes language restrictions)
- Race (includes hairstyle and hair texture)
- Religious creed (includes dress and grooming practices)
- Sex/Gender
- Sexual harassment – hostile environment
- Sexual harassment – quid pro quo
- Sexual Orientation
- Source of Income
 - Section 8
- Other (specify): _____

AS A RESULT, I WAS:

- Denied equal terms and conditions
- Denied loan/homeowners insurance
- Denied accommodation for a disability or medical condition
- Denied accommodation for religious creed
- Denied rental/sale/lease
- Evicted
- Subjected to discriminatory statements/advertisement
- Subjected to discriminatory zoning/land use
- Subjected to restrictive rule/covenant
- Other (specify): City rejected \$20.1 million Project Homekey+ to construct

permanent supportive housing, denying people on the wait list access to housing the City promised to provide under its housing element. The council members voting against the project did so based on explicitly discriminatory remarks against the people who would stand to benefit from this project.

I allege that I experienced: Retaliation

BECAUSE I:

- Participated as a witness in a discrimination or harassment complaint
- Reported or resisted any form of discrimination or harassment
- Requested or used a disability-related accommodation
- Requested or used a religious accommodation

AS A RESULT, I WAS:

- Denied equal terms and conditions
- Denied loan/home owners insurance
- Denied accommodation for a disability or medical condition
- Denied accommodation for religious creed
- Denied rental/sale/lease
- Evicted
- Subjected to discriminatory statements/advertisement
- Subjected to discriminatory zoning/land use
- Subjected to restrictive rule/covenant
- Other (specify): _____

■ **COMPLAINANT'S REPRESENTATIVE**

Do you have an attorney who agreed to represent you in this matter? Yes No

If yes, please provide the attorney's contact information:

Name: Kath Rogers

Firm Name: ACLU of Southern California

Phone: (213) 977-5278 Email: krogers@aclusocal.org

Address: P.O. Box 811370

City: Los Angeles State: CA Zip: 90081

■ **ADDITIONAL INFORMATION (OPTIONAL)**

Briefly describe what happened:

Please see attached:

- EXHIBIT 1: Copy of the February 10, 2026 letter that Inland Counties Legal Services, ACLU SoCal, and Public Interest Law Project sent to Riverside's City Council and Mayor to urge Riverside to reconsider its decision to reject the Project Homekey+ Funds to rehabilitate and remodel the Quality Inn Motel into 114 permanent supportive housing units for low income and unhoused residents. This letter notified the City of Riverside of potential liability for violating FEHA and FHA for their discriminatory zoning decisions.

- EXHIBIT 2: Copy of ACLU SoCal's previous letter to the City dated February 2, 2026.

- EXHIBIT 3: Summary of Riverside City Council's members' statements about this project.

HCD has indicated that the funding will remain available through May 30, 2026, if the City reconsiders voting to fund the project. As such, Complainant respectfully requests CRD expedite this intake and serve the complaint as soon as possible, so the City can reconsider its prior action taken based on a discriminatory rationale.

We are happy to provide further analysis regarding disparate impact and any other documentation that would help to further CRD's investigation.

DEMOGRAPHIC INFORMATION

This information is optional and is only used for statistical purposes.



Primary Language: English

DOB: _____

Gender/Gender Identity: Male Female Non-Binary Other
 Transgender Male Transgender Female Intersex

Marital Status: Single Married Cohabitation Divorced

Race: American Indian, Native American or Alaskan Native Asian
 Native Hawaiian or Other Pacific Islander White
 Black or African American Other

Ethnicity: Hispanic or Latino Non-Hispanic or Latino

National Origin:

- | | | |
|---|---|---|
| <input type="checkbox"/> Afghan | <input type="checkbox"/> Hawaiian | <input type="checkbox"/> Other African |
| <input type="checkbox"/> American [U.S.A] | <input type="checkbox"/> Hmong | <input type="checkbox"/> Other Asian |
| <input type="checkbox"/> Asian Indian | <input type="checkbox"/> Indonesian | <input type="checkbox"/> Other Caribbean |
| <input type="checkbox"/> Bangladeshi | <input type="checkbox"/> Iranian | <input type="checkbox"/> Other European |
| <input type="checkbox"/> Cambodian | <input type="checkbox"/> Iraqi | <input type="checkbox"/> Other Hispanic/Latino |
| <input type="checkbox"/> Canadian | <input type="checkbox"/> Irish | <input type="checkbox"/> Other Middle Eastern |
| <input type="checkbox"/> Chinese | <input type="checkbox"/> Israeli | <input type="checkbox"/> Pakistani |
| <input type="checkbox"/> Cuban | <input type="checkbox"/> Italian | <input type="checkbox"/> Puerto Rican |
| <input type="checkbox"/> Dominican | <input type="checkbox"/> Jamaican | <input type="checkbox"/> Salvadoran |
| <input type="checkbox"/> Egyptian | <input type="checkbox"/> Japanese | <input type="checkbox"/> Samoan |
| <input type="checkbox"/> English | <input type="checkbox"/> Korean | <input type="checkbox"/> Sri Lankan |
| <input type="checkbox"/> Ethiopian | <input type="checkbox"/> Laotian | <input type="checkbox"/> Syrian |
| <input type="checkbox"/> Fijian | <input type="checkbox"/> Lebanese | <input type="checkbox"/> Taiwanese |
| <input type="checkbox"/> Filipino | <input type="checkbox"/> Malaysian | <input type="checkbox"/> Thai |
| <input type="checkbox"/> German | <input type="checkbox"/> Mexican | <input type="checkbox"/> Tongan |
| <input type="checkbox"/> Ghanaian | <input type="checkbox"/> Nigerian | <input type="checkbox"/> Trinidadian and Tobagonian |
| <input type="checkbox"/> Guamanian | <input checked="" type="checkbox"/> Other | <input type="checkbox"/> Vietnamese |
| <input type="checkbox"/> Haitian | | |

- Disability:
- AIDS or HIV
 - Blood / Circulation
 - Brain / Nerves / Muscles
 - Digestive / Urinary / Reproduction
 - Hearing
 - Heart
 - Intellectual / Developmental
 - Limbs [Arms / Legs]
 - Mental Health / Psychiatric
 - Sight
 - Speech / Respiration
 - Spinal / Back / Respiration
 - Other Disability

- Religion:
- Agnostic
 - Atheist
 - Bahai
 - Buddhism
 - Catholicism
 - Christianity
 - Confucianism
 - Hinduism
 - Islam
 - Jehovah's Witness
 - Judaism
 - Neo-Paganism
 - Nonreligious
 - Protestantism
 - Primal-indigenous
 - Quakers
 - Rastafarianism
 - Spiritism
 - Shinto
 - Sikhism
 - Taoism
 - Unitarian-Universalism
 - Zoroastrianism
 - Other

- Sexual Orientation:
- Straight or Heterosexual
 - Gay or Lesbian
 - Bisexual
 - Other



PRIVACY POLICY

The California Civil Rights Department (CRD) values the security and privacy of your personal information and is committed to protecting your privacy rights. CRD seeks only to collect relevant personal information to assist you in investigating and resolving complaints of discrimination as prescribed by the California Fair Employment and Housing Act, California Government Code section 11135 et seq. (discrimination in programs or activities funded by the state); California Government Code section 12900 et seq.; the Unruh Civil Rights Act, California Civil Code section 51; the Ralph Civil Rights Act of 1976, the Equal Pay Act, California Civil Code section 51.7; California Civil Code section 52.5 (civil action for damages for victims of human trafficking); and California Civil Code section 54 et seq. (right to streets, highways, and other public places for blind and other physically disabled persons).

All personal information collected is governed by the Information Practices Act of 1977, California Civil Code sections 1798-1798.78); California Government Code section 11015.5 (electronically collected personal information); California Government Code section 11019.9 (posting of permanent privacy policy); and the California Public Records Act, California Government Code section 7920.000 et seq.

Outlined below is our online Privacy Policy and Notice:

- [Legal Authority for Collection, Maintenance, and Use of Personal Information](#)
- [Disclosure and Sharing of Personal Information](#)
- [Purposes for Use of Personal Information](#)
- [Third-party website links on CRD website](#)
- [Storage of "Cookies" on CRD Website Users' Computers](#)
- [Right of Access to CRD's Records Containing Personal Information](#)
- [Protecting the Privacy of Minors](#)
- [Security of Personal Information](#)
- [Access and Corrections to Your Personal Information](#)
- [Changes to Privacy Policy](#)
- [Effective Date of Privacy Policy](#)

LEGAL AUTHORITY FOR COLLECTION, MAINTENANCE, AND USE OF PERSONAL INFORMATION

CRD collects information that may be directly associated with a specific person. This information is called "Personal Information," and it includes but is not limited to names, addresses, telephone numbers, and email addresses. CRD collects this Personal Information through lawful means from individuals who seek to file a complaint with the CRD, and the information is used to carry out CRD's official responsibilities: establishing jurisdiction and furthering CRD's efforts to investigate and attempt to resolve allegations of unlawful discrimination, harassment, and/or retaliation. If you are requesting CRD to investigate and resolve your filed discrimination complaint, you are required to provide CRD with sufficient information in accordance with California Government Code sections 11135 et seq. and 12900 et seq., and California Civil Code sections 51, 51.7, 52.5, and 54 et seq.

With respect to each item of information CRD seeks to collect from you, CRD will indicate whether submission of the information is mandatory or optional. If you do not provide the information requested, CRD may be unable to investigate or appropriately process your complaint and may have to close your complaint.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

CRD will not disclose, make available, or otherwise use your personal information for purposes other than those specified without your consent, unless required by law. CRD will not distribute or sell any of your electronically or non-electronically collected Personal Information to any third party without your consent, unless required by law.

CRD may share your Personal Information under the following circumstances:

1. You give CRD permission.
2. CRD receives a request from a party with legal authority to obtain the information, such as is the case with a subpoena.
3. As authorized by law, the information is transferred to/shared with the U.S. Equal Employment Opportunity Commission, National Labor Relations Board, U.S. Department of Labor, U.S. Department of Housing and Urban Development, U.S. Department of Health and Human Services, U.S. Department of Education, U.S. Department of Justice, any branch of the California State Government, or any other local or Federal agency with similar jurisdiction.

Note: Non-Personal Information, including allegations in the complaint document, may be disclosed to the public pursuant to a request under the California Public Records Act.

PURPOSES FOR USE OF PERSONAL INFORMATION

The Personal Information collected from you will be used for the purposes for which you are providing it: establishing jurisdiction and furthering CRD's efforts to investigate and attempt to resolve allegations of unlawful discrimination, harassment, and/or retaliation. Electronically collected Personal Information gathered about your visits to the CRD website is used to improve the user experience and for basic web metrics.

THIRD-PARTY WEBSITE LINKS ON CRD'S WEBSITE

The CRD website may contain links to other websites on the Internet that are owned and operated by third parties. CRD does not control the privacy policies or practices of these websites. You are advised to review the privacy policies of the third party offering the website before providing any Personal Information to these websites. CRD is not responsible for the content or practices of any linked third-party websites and such third-party websites are provided solely as a convenience.

STORAGE OF "COOKIES" ON CRD WEBSITE USERS' COMPUTERS

When you visit the CRD website, CRD will send a small piece of information called a "cookie" to your computer that helps CRD recognize your unique computer and your preferences when using the website. Cookies generally contain information about the type of browser you used, the date and time you visited the site, and the web pages you visited. Cookies do NOT include Personal Information, such as names, addresses, telephone numbers, and email addresses, and are only active when you log in to our site. This information collected on cookies is used to improve the user experience and for basic web metrics. Also, each time you visit the CRD website, information about your visit is captured in a web server log file. The information collected in the web server log file is discarded after each site visit and is used only for general reporting metrics and auditing purposes. This type of electronic information collection is permitted by law and is exempt from disclosure under the California Public Records Act.

The cookies will remain on your computer unless you delete them. You can manage your cookies by accessing your browser's preferences menu, which will allow you to delete them or prevent them from being placed on your computer. You should be aware, however, that some websites may not work properly if you block the placement of cookies on your computer.

Please find below links to instructions for managing cookies for specified browsers.

- [Microsoft Edge browsers](#)
- [Macintosh Safari browsers](#)
- [Google Chrome browsers](#)

RIGHT OF ACCESS TO CRD'S RECORDS CONTAINING PERSONAL INFORMATION

In the State of California, laws exist to ensure that the government is open to the public and that the public is able to access records and information possessed by the government. At the same time, there are exemptions from mandatory disclosures in federal and state law.

These exemptions serve various purposes including protecting the privacy of individuals. All information collected by CRD becomes a public record that may be subject to inspection and copying by the public unless an exemption in law exists. In the event of a conflict between this Privacy Policy and the California Public Records Act, the Information Practices Act of 1977 and/or other law governing the disclosure of records, the California Public Records Act, the Information Practices Act of 1977, and/or other applicable law will control.

PROTECTING THE PRIVACY OF MINORS

CRD recognizes the importance of protecting privacy where minors (a person under 18 years of age are involved). CRD is committed to protecting the privacy of minors and does not knowingly collect Personal Information from minors or create profiles of minors through the CRD website. Website users are cautioned, however, that the collection of Personal Information submitted online or in an email will be treated as though it was submitted by an adult. CRD strongly encourages parents, guardians, and adults to be involved in the internet activities of their children or other minors they are responsible for and to provide guidance whenever minors are asked to provide Personal Information online. If you believe a minor has provided us with Personal Information related to a complaint, we ask that a parent, guardian, or other responsible adult contact us at 1-800-884-1684.

SECURITY OF PERSONAL INFORMATION

CRD has put security measures in place to safeguard Personal Information maintained in our electronic and paper files and to protect it against loss or unauthorized access, use, modification, or disclosure. Access to Personal Information is limited to employees who have an established business need for the Personal Information including those directly involved in the filing, investigation, resolution, and/or litigation of your complaint.

CRD's security measures include various security technologies such as encryption software used to protect the security of Personal Information during transmission and storage. Personal information is destroyed according to the CRD's records retention policy, and CRD only retains these records for as long as necessary to fulfill CRD's business needs. CRD trains its employees on the procedures and management of Personal Information that is collected, precautions to be taken to prevent unauthorized access, use, modification, or disclosure, and compliance with limitations on the release of Personal Information.

ACCESS AND CORRECTIONS TO YOUR PERSONAL INFORMATION

You have the right to inspect the Personal Information collected about you. Upon request, CRD will provide you with the Personal Information CRD collected in order to carry out its official responsibilities. You may correct errors in your Personal Information by submitting a written request that credibly shows the error and the accurate and complete facts. If you believe that your Personal Information is being used for a purpose other than what you intended when you submitted it, you may contact CRD to rectify the misuse. CRD will take reasonable steps to verify your identity before granting access or making corrections.

CRD PRIVACY OFFICER CONTACT INFORMATION

If you have any questions or concerns about the information presented in this Privacy Policy, or if you would like to inspect records containing your Personal Information or request corrections to it, you may contact:

CRD Privacy Officer
651 Bannon Street, Suite 200,
Sacramento, CA 95811
contact.center@calcivilrights.ca.gov
1-800-884-1684

CHANGES TO PRIVACY POLICY

CRD may update and revise this Privacy Policy. CRD will prominently post any revision or update on the CRD website.

EFFECTIVE DATE OF PRIVACY POLICY

Effective Date: January 1, 2017

Revision Date: July 1, 2024

EXHIBIT 1



February 10, 2026

Riverside Mayor and City Council
City Hall
3900 Main Steet
Riverside, CA 92522

CC: Riverside City Manager, Mike Futrell

Sent via email to: City_Clerk@riversideca.gov, DGause@riversideca.gov, pdawson@riversideca.gov, pfalcone@riversideca.gov, ccervantes@riversideca.gov, SRobillard@riversideca.gov, cconder@riversideca.gov, smill@riversideca.gov, jperry@riversideca.gov, shemenway@riversideca.gov, AHolcomb@riversideca.gov, mbruns@riversideca.gov, SGarcia@riversideca.gov, REngles@riversideca.gov, SArellano@riversideca.gov, MMaldonado@riversideca.gov, lagunas@riversideca.gov, lvega@riversideca.gov, MKruse@riversideca.gov

RE: City of Riverside Notice of Violations of Housing Element Law and Anti-Discrimination in Land Use Regarding City Council's Vote on Quality Inn Project

Dear Riverside City Leaders:

Inland Counties Legal Services (ICLS), The Public Interest Law Project (PILP), and American Civil Liberties Union Foundation of Southern California (ACLU) write regarding the City of Riverside's (City) action rejecting a \$20.1 million Project Homekey+ state grant and the use of \$9.5 million in federal and state funding (collectively Grant Funds) to rehabilitate and remodel the Quality Inn Motel into 114 permanent supportive housing units for low income and unhoused residents who are experiencing homelessness in the City (hereinafter referred to as the Quality Inn Project). The California Department of Housing and Community Development ("HCD") has raised compliance concerns and has indicated that its Housing Accountability Unit will investigate the City Council's action to reject the Grant Funds, and in turn, the Quality Inn Project. We urge you to reconsider the decision to reject the Grant Funds considering the City's obligations under the Housing Element Law and fair housing laws that prohibit discrimination in land use and zoning. The City leaves itself vulnerable to litigation on behalf of low-income and disabled community-members reliant on this permanent supportive housing, especially given many councilmembers' public comments evidencing discriminatory animus and bias in rejecting these Grant Funds.

On or about February 9, 2026, the California Department of Housing and Community Development ("HCD") issued written correspondence to the City Council confirming that it is aware of the City's rejection of more than \$20 million in Homekey+ funding for the Quality Inn Project. HCD further advised that the City's action raises immediate concerns regarding implementation of the City's adopted Housing Element, the City's obligations as a Prohousing Designation jurisdiction, and the City's responsibility to affirmatively further fair housing ("AFFH"). HCD has indicated that its Housing Accountability Unit will investigate further and

Senior Line: 800.977.4257

Toll Free: 888.245.4257

InlandLegal.org

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92507-2106

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P.O. Box 10650
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92202-2563

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3500 Porsche Way, #200
Ontario, CA
91764-4941

Riverside
1040 Iowa Ave., #109
Riverside, CA
92507-2106

Victorville
15428 Civic Center Drive, Ste 175
Victorville, CA
92392

urged the City Council to reconsider the Homekey+ funding award at its February 10, 2026 meeting. “(the “HCD Letter”).”

The City Council should reschedule this matter for a vote to provide an opportunity to correct course and accept the Grant Funds for the Quality Inn Project. The City risks missing a critical opportunity to house our most vulnerable community members.

I. Rejection of the Grant Funds for the Quality Inn Project will Inhibit the City’s Ability to Implement its Housing Element Goals, Policies, and Programs for Persons Experiencing Homelessness in the City.

Riverside’s Housing Element recognizes the positive evidence-backed outcomes associated with the Housing First Model of Service Delivery and need for creating permanent supportive housing units in furtherance of the City’s goals. “Housing First is a best practice approach to address homelessness, and specifically to using the supportive housing intervention that are characterized as deeply affordable housing paired with wrap around supportive services targeted at hard-to-serve homeless households with a disability.” (Riverside Housing Element, Sixth Cycle 2021-2029, Technical Background Report, pg. 144) “Supportive housing has proven effective in ensuring housing stability of formerly homeless households and limiting returns to homelessness. Additionally, many studies have demonstrated the cost effectiveness of providing housing and services that lead to decreased utilization of high-cost public systems, including emergency services, health care, and criminal justice.” (*Id.*) The Housing Element committed to using motel conversion opportunities to create transitional and supportive housing through Project Roomkey or equivalent mechanisms. (*Id.* at 107.)

These commitments are reflected throughout the Housing Element, including Policy HE-2 and related programs. The Housing Element’s **Policy HE-2 – Homelessness** directs the City to “expand housing and services that address the needs of the City’s homeless population,” (City of Riverside Housing Element (2021–2029), Policy HE-2 – Homelessness: Expand Housing Services that Effectively Address the Needs of the City’s Homeless Population, p. 48). This policy includes implementing the City’s Housing First strategy and supportive housing programs that integrate supportive units into new affordable developments. (City of Riverside Housing Element, Programs HE-2-1 and HE-2-2 (Supportive Housing and Housing First), pp. 48–49). The Housing First Strategy, adopted by the City in 2018 and carried forward through the Housing Element, provides guiding policy direction for addressing homelessness by prioritizing supportive housing and rapid re-housing without preconditions. (City of Riverside Housing Element, Program HE-2-1 – Housing First Strategy, pg. 48). The City’s Housing Element identifies the need to increase permanent supportive housing unit capacity and reduce returns to homelessness through evidence-based housing interventions, consistent with the City’s quantified goals and strategies to meet its share of regional housing needs and serve residents with the greatest barriers to housing stability. (*Id.*; City of Riverside Housing Element, Housing Plan and Objectives and Key Performance Indicators, pp. 47–50).

The Quality Inn Project qualifies as supportive housing. The funding that the City intends to reject is a one-time opportunity from the state to address the need for permanent supportive housing. The Riverside Housing Development Corporation (RHDC) submitted its proposal to the City in February 2025, seeking to remodel the 114 hotel rooms and transform them into studio apartments prioritizing low-income residents and people who are unsheltered. Government Code section 65582(n) defines supportive housing as “housing with no limit on length of stay, that is occupied by the target population, and that is 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.” The City is rejecting critical funds that will further its obligation to identify and address the housing needs of its community members who are unsheltered as required by Government Code sections 8899.50 and 65583.

II. Housing Element Noncompliance Exposes the City to Significant Financial, Funding, and Enforcement Consequences.

Housing availability and affordability is a critical issue, and local leaders have the power to make the most impactful decision regarding access to housing. California requires local leaders to develop their plan for growth and outline how they intend to combat the challenges that contribute to the housing crisis via the housing element. As such, California state law has established clear penalties for local jurisdictions that fail to comply with California’s Housing Element Law.

First, noncompliance will result in ineligibility or delay in receiving state funds that require a compliant housing element as a prerequisite, including, but not limited to, the following:

- Permanent Local Housing Allocation,
- Local Housing Trust Fund Program,
- Infill Infrastructure Grant Program,
- SB 1 Caltrans Sustainable Communities Grants, and
- Affordable Housing and Sustainable Communities Program.

Additionally, the City’s actions raise serious concerns regarding its continued eligibility for its Prohousing Designation and related state funding incentives. Government Code section 65589.9 reflects the Legislature’s intent to incentivize jurisdictions that maintain compliance with housing element requirements and adopt Prohousing local policies, including by awarding “additional points or other preference in the scoring of competitive housing and infrastructure programs.” (Gov. Code, § 65589.9, subd. (a).) The statute further provides that jurisdictions with a housing element found to be in substantial compliance with California Housing Element Law (Gov. Code, § 65580 et seq) and that have been designated as Prohousing “shall be awarded additional points or preference in the scoring of program applications” for key state programs, including the Affordable Housing and Sustainable Communities Program and the Infill Infrastructure Grant Program. (Gov. Code, § 65589.9, subd. (b)(1)–(4).)

Moreover, HCD is authorized to monitor Prohousing Designations on an ongoing basis and may revoke a Prohousing Designation at any time upon determining that a jurisdiction has failed to meet its obligations to affirmatively further fair housing, failed to comply with state housing law, or taken action inconsistent with its housing element. (Cal. Code Regs., tit. 25, § 6607(a)(1)(D)–(F).) Accordingly, the City’s decision to reject the Grant Funds for the Quality Inn Project not only threatens the City’s compliance with Housing Element Law, but it also places at risk the City’s Prohousing Designation status and the funding incentives tied to that designation.

HCD has also specifically noted that the City is significantly behind in meeting its Regional Housing Needs Allocation (“RHNA”), having permitted 0% of its very low-income RHNA while permitting more than 31% of its above-moderate income RHNA (see [Annual Progress Reports - Data Dashboard and Downloads | California Department of Housing and Community Development, last accessed on February 10, 2026.](#)) This imbalance heightens the risk that the

City's decision to deny Grant Funds towards the Quality Inn Project is an unlawful barrier to the development of much needed housing for very low-income households and residents in protected classes, including persons with disabilities.

III. The City of Riverside's Decision to Reject the Grant Funding Constitutes Discrimination Under California and Federal Fair Housing Laws.

California's Planning and Zoning Law (Gov. Code, § 65000 et seq.) prohibits discrimination in land use and planning. Specifically, Government Code section 65008 deems any action taken by a city 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 protected characteristic. (Gov. Code § 65008(a).) The law further provides that no city shall 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 a person in a protected class, including persons with disabilities and persons and families of very low, low, or moderate income." (Gov. Code § 65008(b).) Similarly, a city may not impose requirements on 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. (*Id.*, subd. (d)(2)(A).)

California's Fair Employment and Housing Act (FEHA) makes it unlawful for a city to "discriminate through public . . . land use practices, decisions, and authorizations because of" protected characteristics, including disability, race, and source of income. (Gov Code § 12955 (l); Cal. Code Reg., tit. 2, §§ 12060 (discriminatory effects standards under FEHA); 12161, *et seq.* (prohibiting land use discrimination); and 12141 *et seq.* (prohibiting source of income discrimination and discussing liability for source of income discrimination.)) "A practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of individuals, or creates, increases, reinforces, or perpetuates segregated housing patterns, based on membership in a protected class. A practice predictably results in a disparate impact when there is evidence that the practice will result in a disparate impact even though the practice has not yet been implemented." (Cal. Code Regs., tit. 2, § 12060(b).)

Similarly, the Fair Housing Act ("FHA") prohibits housing discrimination and provides for liability where a city's actions create unlawful barriers to housing for protected classes, including persons with disabilities. The crux of a disparate impact claim under the Fair Housing Act (FHA) is "targeting artificial barriers to housing." (*Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193, 255 (citing *Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc.* (2015) 576 U.S. 519.)) A disparate impact claim involves a three-step burden shifting analysis, where a Plaintiff first proves that the challenged practice caused or will cause a discriminatory effect. (*Id.* at 257.) Then, the Defendant provides sufficient justification for the practice. (*Id.*) Finally, the Plaintiff established the reasons justifying the practice could be served by another practice with a less discriminatory effect. (*Id.*) There is no requirement to prove discriminatory intent. (*Id.* at 255.)

Here, the City's decision to reject funding for the Quality Inn Project – an evidence based supportive housing initiative intended to serve low-income residents and individuals experiencing homelessness – creates significant risk of liability under California and federal fair housing laws. The City cannot lawfully reject housing opportunities for individuals with disabilities and low-income residents based on generalized fears, speculation, or stereotypes about the intended residents, particularly where the effect of the decision will predictably exclude protected classes from housing opportunities and undermine the City's state housing goals. The

few comments offered by the Council members voting to reject the funding suggest animus is the motivating factor in the City's decision.

HCD has confirmed that its Housing Accountability Unit is investigating the City Council's action, underscoring that the City's decision presents immediate housing compliance concerns and potential fair housing liability.

IV. The Council's Vote Was Based on Discriminatory Stereotypes and Unsupported Claims.

The public record demonstrates that the City Council's decision to reject the Quality Inn was driven, in substantial part, by discriminatory stereotypes and fear-based assumptions about people experiencing homelessness and individuals with disabilities, including those living with serious mental illness and substance use disorders. These statements reflect an unlawful basis for denying housing and are inconsistent with the City's obligation under state and federal fair housing laws.

During and after the vote, councilmembers repeatedly framed the proposed supportive housing project as inherently criminal, dangerous, and incompatible with the community – not based on objective evidence but based on stigmatized generalizations about the people who would reside in the development.

For example, Councilmember Conder publicly asserted that the project “would have done NOTHING to reduce homelessness or crime,” and characterized contrary claims as “pure fantasy, if not outright lies.” He further asserted that supportive housing under a Housing First model becomes an “epicenter of crime,” where “felonies including the use, sale, and manufacture of illegal drugs; human trafficking and prostitution run rampant.” Councilmember Conder described the project as a “heartless, ‘Warehouse of the Homeless,’” claimed it would not require residents to “obey our laws,” and warned that it would become an “incubator of crime” posing a “grave risk” to “the over 29,000 students” at North High School and UC Riverside. He further claimed that “criminals travel to where there is opportunity,” and suggested they would “break into mailboxes, burglarize homes, and assault people on the street.”

These statements explicitly equate homelessness and behavioral health disability with criminality and violence, reflecting precisely the type of stigmatizing stereotypes that cannot lawfully form the basis for a land use decision.

Equally concerning, Councilmember Conder premised several of his arguments on demonstrably inaccurate assertions regarding the structure of the project. Specifically, he claimed the project would be “Section 8 Public Housing” such that “anyone who met the federal criteria... could not be turned away” and that the City would be unable to prioritize seniors or veterans. This claim mischaracterizes the nature of the proposed project-based rental assistance model and reflects a broader pattern of misinformation and stigmatizing assumptions being used to justify rejection of housing intended to serve extremely low-income households and individuals with disabilities. This is precisely the type of discriminatory stereotyping that state and federal fair housing laws prohibit. Reliance on such misinformation and generalized fears cannot constitute substantial evidence sufficient to justify the rejection of supportive housing under state housing law.

Similarly, Councilmember Falcone publicly stated that he did not support a “Housing First Absolute” approach and expressed concern that without “expecting tenants to engage in support,”

individuals with “addiction and mental health challenges” would be left to “navigate on their own.” He emphasized a preference for “structure” and “expectations” and stated that tenants should be required to actively partner with service providers, “toward healing.”

Councilmember Mill likewise stated that the project would require the City to commit to permanent supportive housing “with no enforceable expectations around treatment, recovery , or stabilization,” and described the intended population as individuals suffering from long-term substance use disorders and/or serious mental illness,” with services that were “entirely voluntary” and no mandated participation in treatment or clinical care.

Councilmember Robillard similarly emphasized that Homekey+ eligibility is “specifically centered on individuals who are unhoused and who are experiencing serious mental illness and substance use disorders,” and characterized those conditions as foundational requirements of the program.

Collectively, these statements reflect hostility toward the intended residents of supportive housing and demonstrate that the vote was shaped by stigmatizing assumptions equating homelessness and disability with criminality, danger and lawlessness, as well as making discriminatory and inflammatory statements about persons who are justice and system-impacted due to interaction with the criminal legal system. As to this class of persons, California law extends fair housing protections to help aid their successful reentry back into society. (Cal. Code Reg. §§ 12264-12271; see also Gov. Code § 53165.1.)

Further, this framing is particularly concerning because individuals with serious mental illness and substance use disorders are protected under state and federal disability discrimination laws, and cities may not deny housing based on speculative fears or generalized stereotypes regarding disability. (Gov. Code, § 12955.)

Moreover, several councilmembers repeatedly focused on the fact that the project was not exclusively reserved for seniors or veterans, suggesting that the absence of such a limitation justified rejection of the Grant Funds. This reasoning is troubling because it implies that housing for individuals experiencing homelessness is only worthy of support when limited to certain “acceptable” subgroups. While seniors and veterans may be prioritized as a matter of local preference, the City cannot lawfully reject a supportive housing project because it will also serve individuals experiencing homelessness who have disabilities or behavioral health concerns. (Gov. Code §§12955; 65008; Cal. Code Reg., tit. 2, §12161.)

The City’s reliance on unsupported assumptions about the intended residents – particularly assertions that the Quality Inn Project would inevitably increase criminal activity, trafficking, drug use, and violence – further demonstrates that the vote to reject it was driven by fear-based narratives and discriminatory animus rather than evidence-based land use criteria. These claims are not supported by objective findings tied to the Quality Inn Project’s specific operational plan, and they cannot serve as a lawful justification for denying housing opportunities to protected classes. (Cal. Code Reg., tit. 2, § 12161 (b).)

As a result, the City’s decision to reject the Quality Inn Project exposes the City of Riverside to significant legal liability for discriminatory land use practices that will predictably and disproportionately impact low-income residents and persons with disabilities. (Cal. Code. Reg., tit. 2, § 12060.) The City does not have a reasonable justification for rejecting the funds that will

clearly further the goals stated in its Housing Element, and low-income community members stand to be disparately impacted by the City’s decision.

Conclusion

We strongly recommend that the City of Riverside reconsider its vote. We hope to resolve this issue amicably to ensure that all Riverside residents are treated with dignity in the City’s furtherance of its housing goals.

Sincerely,

Inland Counties Legal Services

/s/Chloe McGrath Wright

Chloe McGrath Wright
Managing Attorney

ACLU SoCal

/s/Kath Rogers

Kath Rogers
Senior Staff Attorney

Public Interest Law Project

/s/Ugochi Anaebere-Nicholson

Ugochi Anaebere-Nicholson
Staff Attorney

/s/ Veronica J. Garcia

Veronica J. Garcia
Housing Practice Group Director

cc: Melinda Coy, Housing Accountability Unit Chief,
Land Use and Local Government Relations
Housing & Community Development

EXHIBIT 2



February 2, 2025

Riverside Mayor and City Council
City Hall
3900 Main Street
Riverside, CA 92522

CC: Riverside City Manager, Mike Futrell

Via email:

City_Clerk@riversideca.gov, DGause@riversideca.gov, pdawson@riversideca.gov, pfallcone@riversideca.gov, ccervantes@riversideca.gov, SRobillard@riversideca.gov, cconder@riversideca.gov, smill@riversideca.gov, jperry@riversideca.gov, shemenway@riversideca.gov, AHolcomb@riversideca.gov, mbruns@riversideca.gov, SGarcia@riversideca.gov, REngles@riversideca.gov, SArellano@riversideca.gov, MMaldonado@riversideca.gov, llagunas@riversideca.gov, lvega@riversideca.gov, MKruse@riversideca.gov

Re: Urgent Action Needed - Reconsider City Council Vote on Quality Inn Project

Dear Riverside City Leaders:

We write to bring your immediate attention to a January 13, 2026 council vote rejecting a \$20.1 million state grant and the use of \$9.5 million in federal and state grant funding to convert the Quality Inn Motel into apartments for low income and unhoused residents. This vote not only has devastating policy consequences but also raises serious legal questions. The goal of this letter is to ask the City to reconsider its position in light of its legal obligations under its Housing Element and fair housing laws.

This proposal was initially brought to the Riverside City Council from the Riverside Housing Development Corporation (RHDC) in February 2025. It called for remodeling 114 hotel rooms into studio apartments prioritizing low-income residents and people who are unsheltered. City staff explained during the council meeting that this is a **one-time funding opportunity from the state to address the need for permanent supportive housing**, and it is unclear whether the City will have another such opportunity in the foreseeable future.

At least one of the members who voted no on this proposal expressed opposition to the Housing First model, the state's evidence-backed approach to providing housing for unsheltered Californians.¹ Several of the comments during the meeting were based on unfounded stereotypes or animus against unhoused community members.

¹ See California Welfare & Institutions Code § 8255.

The rejection of this proposal will undoubtedly have a major impact on the City's affordable housing goals. The City's Housing First Plan commits to, "Housing First as a best practice approach to address homelessness, and specifically to using the supportive housing intervention that is characterized as deeply affordable housing paired with wrap-around supportive services targeted at hard-to-serve homeless households with a disability."² The City's legally enforceable Housing Element relies on its Housing First Policy and commits to the creation of new, deeply affordable housing units like the proposed project.³

ACLU SoCal and partner organizations are investigating this City Council vote and how this impacts the City's ongoing legal commitments, including under the City's Housing Element. We strongly encourage the City to reconsider its vote, paying particular attention to how the City will meet its legal obligations under its Housing Element and other fair housing laws without the approval of this project.

We are available as a resource, and we are happy to discuss this matter by phone. We can be reached by phone at 213.977.5278 or by email at krogers@aclusocal.org. Thank you in advance for your prompt reconsideration of this matter.

Sincerely,



Kath Rogers
Senior Staff Attorney

² City of Riverside, Housing First Strategy, pg. 1, March 13, 2018, available at: <https://riversideca.gov/sites/default/files/ohs/pdf/Housing%20First%20Plan%20CC%20Approval.pdf>

³ See e.g. City of Riverside Housing Element, 2021-2019, at pg. 27, available at: <https://riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/general-plan/2023/2022-09%20Final%20Certified%20HE%20Technical%20Background%20Report.pdf>

EXHIBIT 3

The following are additional citations to statements made by Riverside Council Members who voted in opposition to the project. Some provide evidence of discrimination and/or views on Housing First that are inconsistent with the City's Housing Element and/or state law.

Riverside City Council Meeting (January 13, 2026)

Steven Robillard (Ward 3)

- "We're building units, and we're filling those units, and then those people don't really move on past that unit. They stay in those units for very, very long periods of time, and we're not getting the turnover of you graduated essentially to independent living, you stay in a supportive environment for 10, 20, 30 years. My concern is this is small drop in a very big bucket." (4:57:15).
- The City of Riverside "shoulders [a] disproportionate" share of the region's permanent supportive housing. (4:58:37).
- "This site was not designed for long term residential stability or neighborhood integration." (4:59:23).

Sean Mill (Ward 5)

- "A centerpiece of my campaign has always been that the housing first model is a failure, and it continues to be a failure. (5:16:40).
- "Giving somebody a house without requiring treatment has always been something I've opposed." (5:17:02).
- "We've heard a lot of talk about seniors and veterans living there. But in regards to the 94 permanent supportive housing units, it will be folks with documented mental health and substance abuse disorders, correct? (5:17:13) [This quote was followed by a series of questions suggesting there should be lease requirements for past criminal histories, forced treatment, etc.]
- "What incentives are there for people to better themselves... to, you know, if they start making too much money, they're gonna, you know, not qualify to live here anymore, so what incentives is there for folks to improve their quality of life?" (5:27:40)
- "I've always been suspect of the housing first model. I believe giving someone a house without treated the root cause of their problems... The root cause many times is mental health issues or drug abuse. Giving someone a house that has mental health issues and drug abuse issues, and not treating those issues, not really helping them... Housing first has devolved into housing without enforceable services, rules, or expectations." (5:30:57).
- "I cannot continue to support the housing first model. This City needs to change its policy. Housing First is failing. (5:32:40

Riverside City Council Meeting ([May 20, 2025](#))

Philip Falcone (Ward 1)

- “I look at this very similarly to [Oasis Senior Living](#) that’s in Ward 1, which frankly has been a total, absolute nightmare. The outside looks pretty much fine, but the inside, I cannot in good faith send our police and fire personnel into another facility like that, when firefighters responding to that facility relentlessly, where people have literally burned themselves to death in that facility, I just don’t have faith that what has happened there, you know, won’t happen here...” (3:51:59).

Riverside Housing and Homelessness Committee Meeting ([April 28, 2025](#))

Steven Robillard (Ward 3)

- “There’s a lot of trauma there [referring to veterans] that just doesn’t go away... When you have that adjacent to a bunch of families visiting a location for the first time, I see a lot of potential issues there.” (1:27:48).

- “They sign a long-term lease, and do they qualify for all the same, uhm, tenant rights that everyone else qualifies for? So we know how that goes. Uhm, you know, there’s a lot of issues there. We see that every day with people abusing those standards...” (1:28:10).