

The Board of Supervisors

County Administration Building
1025 Escobar St., 4th floor
Martinez, California 94553

John Gioia, 1st District
Candace Andersen, 2nd District
Diane Burgis, 3rd District
Ken Carlson, 4th District
Shanelle Scales-Preston, 5th District

Contra Costa County



Monica Nino
Clerk of the Board
and
County Administrator
(925) 655-2075

April 21, 2026

U.S. Department of Housing and Urban Development
The Honorable Scott Turner
451 7th Street, S.W.
Washington, DC 20410

RE: Comments on Proposed Rule FR-6520-P-01—Establishing Flexibility for Implementation of Work Requirements and Term Limits

Dear Secretary Turner:

On behalf of the Contra Costa County Board of Supervisors, we respectfully submit comments regarding the U.S. Department of Housing and Urban Development's (HUD's) proposed rule concerning expanded flexibility in implementing work requirements and term limits. Contra Costa County has significant concerns that the proposed policy could reduce housing stability for low-income residents who already face substantial, systemic barriers related to housing, childcare, transportation, and healthcare access.

The proposal would permit Public Housing Authorities and property owners to require up to 40 hours per week of work activity for a single adult, or 80 combined hours for two-adult households. These requirements do not fully reflect the circumstances of residents managing chronic illnesses, episodic disabilities, mental health conditions, or caregiving responsibilities, nor the realities faced by individuals navigating disability determinations. In addition, the proposed hardship process may create an administrative burden for tenants, requiring repeated documentation of limitations and contributing to stress, instability, and potential risk of noncompliance or eviction.

Contra Costa County residents already encounter significant challenges in securing and maintaining affordable housing. Renters must earn approximately \$45.50 per hour to afford the county's average asking rent of \$2,366, placing substantial pressure on low-income families. Implementing additional requirements that may limit access to affordable housing could exacerbate these conditions.

For those who are working, childcare and transportation present significant challenges. Access to reliable childcare is similarly constrained. Nearly 19,400 low-income children under age five who qualify for subsidized care currently lack available slots, and approximately 90 percent of infants and toddlers do not have access to subsidized programs. Imposing work requirements without corresponding childcare resources would likely widen this gap. Transportation barriers also pose significant challenges. Contra Costa County has limited transit connectivity, long commute times, and scheduling gaps that make it difficult for low-income workers to maintain consistent full-time employment, particularly when combined with childcare shortages. Even short-term disruptions due to transportation or childcare challenges could jeopardize a family's housing under the proposed rule.

Additionally, the cumulative effect of the proposed rule alongside other major policy and funding changes could have broader unforeseen impacts. As many as 93,000 Contra Costa residents are projected to lose health insurance coverage and up to 17,600 may lose food assistance benefits under the One Big Beautiful Bill Act (Public Law No. 119-21). Residents managing chronic illness or mental health conditions could face heightened challenges that further limit their ability to meet stringent employment requirements.

Taken together, these data illustrate the intersecting structural barriers affecting Contra Costa County residents. Rigid work-hour mandates may not account for the realities of housing costs, limited childcare capacity, inconsistent transportation options, and fluctuating health needs. Rather than promoting economic stability, such requirements could create additional obstacles for households already experiencing significant hardship.

Effective housing policy should incorporate supportive resources—such as childcare, healthcare access, transportation reliability, and reasonable accommodations—and processes that acknowledge residents' varied circumstances. For these reasons, Contra Costa County respectfully urges HUD to reconsider the proposed rule.

Sincerely,



DIANE BURGIS

Chair, Board of Supervisors

cc: Honorable Members, Contra Costa County Board of Supervisors
Honorable Members, Contra Costa County Federal Legislative Delegation
Monica Nino, County Administrator
Jim Davenport & Paul Schlesinger, Thorn Run Partners

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April 23, 2026

The Honorable John Garamendi
2428 Rayburn HOB
Washington, DC 20515

RE: Support - HOME Investment Partnerships Reauthorization and Improvement Act

Dear Congressman Garamendi:

As Chair of the Board of Supervisors of Contra Costa County, I write to express our support for your HOME Investment Partnerships Reauthorization and Improvement Act and its inclusion in the bipartisan 21st Century ROAD to Housing Act. This legislation represents a highly impactful modernization of the nation's largest federal affordable housing block grant program.

This legislation will update and significantly expand the HOME Investment Partnerships Program as a critical tool for states and local governments. The HOME program has played an essential role in financing new construction, rehabilitation, down payment assistance, rental assistance, and the development of units serving extremely low-income residents—including seniors, veterans, people experiencing homelessness, and residents with disabilities.

Since 1992, California has benefited from more than \$5.27 billion invested, 121,727 homes built or preserved, 43,840 families receiving rental assistance, 277,318 jobs supported, and \$19.2 billion in local income generated. A renewed and expanded commitment of \$5 billion in funding with annual increases of 5% through FY 2028 represents a level of federal investment local communities urgently need.

In Contra Costa County, the need for high-quality, affordable housing remains imperative. Enhancing down payment assistance, expanding support for Community Land Trusts and shared-equity homeownership models, improving access for nonprofits, and allowing local governments to leverage future HOME funds through loan guarantees are all meaningful, practical improvements that will provide tools to expand housing opportunities throughout the region.

Thank you for your commitment to affordable housing. We appreciate your leadership in advancing a comprehensive, bipartisan housing package that expands supply, improves affordability, and strengthens efficiency and opportunities for local governments.

Sincerely,



DIANE BURGIS

Chair, Board of Supervisors

cc: Honorable Members, Contra Costa County Board of Supervisors
Monica Nino, County Administrator
John Kopchik, Director of Department of Conservation and Development
Jim Davenport & Paul Schlesinger, Thorn Run Partners

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Monica Nino
Clerk of the Board
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April 28, 2026

The Honorable Mark DeSaulnier
2134 Rayburn House Office Building,
Washington, DC 20515

The Honorable John Garamendi
2428 Rayburn House Office Building
Washington, DC 20515

The Honorable Josh Harder
209 Cannon House Office Building
Washington, DC 20515

RE: H.R. 7567, the Farm, Food, and National Security Act of 2026 (Farm Bill) - CONCERNS

Dear Congressman DeSaulnier, Congressman Garamendi, and Congressman Harder:

As Chair of the Board of Supervisors of Contra Costa County, I write to express deep concern over H.R. 7567, the Farm, Food, and National Security Act of 2026 (Farm Bill), which would reauthorize and reform U.S. Department of Agriculture programs through FY2031. This narrowly scoped Farm Bill, which has not undergone the traditional bipartisan process, may be the only remaining opportunity to mitigate the imminent and severe impacts from H.R. 1 (Public Law 119-21) on the Supplemental Nutrition Assistance Program (SNAP) before they take effect.

As you know, SNAP, known in California as CalFresh, is the state's largest and most effective anti-hunger program. Contra Costa County administers SNAP for residents across your districts, serving nearly 110,000 people each month. Our County is preparing for the substantial impacts of H.R. 1. Among these changes are the expansion of the three-month time limit for Able-Bodied Adults Without Dependents (ABAWDs), which takes effect taking effect June 1 of this year, and the shift of SNAP administrative costs to counties and the State beginning October 1.

The changes to SNAP in H.R. 1 place California counties in an untenable position. Contra Costa will experience a significantly increased workload to meet new federal requirements, paired with a reduction in the federal share of program administration from 50 percent to 25 percent, all while people in our communities face increasing need for these services. Current estimates indicate that nearly one million Californians could lose SNAP benefits while counties face severe fiscal strain from reduced federal funding.

Contra Costa County anticipates that approximately 51,313 residents could be affected by the expanded ABAWD requirements. This change will require extensive additional documentation, verification of work, volunteer activity, or school enrollment, and will lead to loss of benefits for individuals unable to comply. It will also significantly increase eligibility staff workload for exemption determinations, updates to our state's automated eligibility system (called CalSAWS in California), referrals to employment programs, tracking participation, and managing related calls and appeals.

The reduction in the federal share of SNAP (CalFresh) administrative funding is expected to create an annual shortfall of approximately \$12.2 million for Contra Costa County. If the State and counties are unable to absorb these costs, outreach efforts may be curtailed, and services may be delayed—including call center support, electronic benefit transfer (EBT) issuance, and processing of applications, renewals, and case changes. Staffing reductions could further compromise accuracy, timeliness, and the quality of service provided to our community.

As error rates increase, H.R. 1 will require our state and County to divert more resources away from our community and towards the payment error rate provisions of H.R. 1, which will transfer the cost of federal SNAP benefits to states and local governments for the first time ever. The California Legislative Analyst's Office estimates an increase in the state's CalFresh costs related to payment error rates of up to \$2 billion annually beginning October 2027, during the timeframe of the proposed Farm Bill.

Taken together, these changes are anticipated to increase food insecurity in our community, while reducing our local resources to meet these needs. For these reasons, we are concerned with the proposed Farm Bill and urge action to mitigate the harmful changes to SNAP from H.R. 1 to the most vulnerable members of our community. Thank you for your ongoing efforts on behalf of the people and the County of Contra Costa.

Sincerely,



DIANE BURGIS

Chair, Board of Supervisors

cc: Honorable Members, Contra Costa County Board of Supervisors
Monica Nino, County Administrator
Dr. Marla Stuart, Employment and Human Services Director
Jim Davenport & Paul Schlesinger, Thorn Run Partners