

# DUDEK

2280 HISTORIC DECATUR ROAD, SUITE 200  
SAN DIEGO, CALIFORNIA 92106  
619.591.1370

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State Department of Housing and Community Development  
C/O Land Use and Planning Unit  
2020 W. El Camino Ave, Suite 500  
Sacramento, CA 95833

**Subject:** City of Highland Draft 6<sup>th</sup> Cycle Housing Element

I am pleased to submit the Draft 6<sup>th</sup> Cycle Housing Element on behalf of the City of Highland. The Planning and Urban Design team at Dudek is honored to have been selected to support the City of Highland with this update to the 5<sup>th</sup> Cycle Housing Element to assist the City in meeting their comprehensive housing needs. This draft plan has been developed to meet the requirements of Housing Element law, recent relevant housing-related legislation, and the guidance provided by the State Department of Housing and Community Development (HCD).

The City of Highland and the Dudek team have worked closely with the community and interested stakeholders to develop this vision for the City, and the outreach component of the update will be continued throughout the process. Our team looks forward to HCD's review of the submitted draft and will ensure that all feedback and comments from HCD and the public are addressed prior to Housing Element adoption.

Attached you will find the City of Highland's Draft Housing Element, including goals, policies, and programs; and all supporting documentation.

Should you have any questions, please feel free to contact me directly at (619)695-7721 or by email at [evansickel@dudek.com](mailto:evansickel@dudek.com).

Sincerely,

Erika Van Sickel  
Urban Planner

# City of Highland

## 6<sup>th</sup> Cycle Housing Element Update

DRAFT  
(2021-2029)

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August 2021

# Housing Element

## Introduction

The Housing Element of the General Plan addresses the comprehensive housing needs in Highland for the 8-year planning period (2021–2029). It provides an analysis of the local housing needs for all income levels, details barriers to providing needed housing, and identifies a set of strategies for meeting the housing need within the planning period. Housing Elements are one of eight required components of a General Plan and are guided by State law, which requires all local governments to update their Housing Elements every 8 years. This is the 6th update to the City of Highland (City) Housing Element (6th cycle).

The Housing Element is a strategic vision and policy guide designed to help address the comprehensive housing needs of the City over an 8-year period (2021 – 2029 planning period). It defines the City’s housing needs, identifies the barriers or constraints to providing needed housing, and provides policies to address these housing needs and constraints.

Recent amendments to housing and planning laws aim to address California’s housing shortage, placing a substantial number of new requirements for the 6th cycle Housing Element. Housing in California has become some of the most expensive in the nation, ranking 49th out of 50 states in homeownership rates as well as the supply of housing per capita. Only half of California’s households are able to afford the cost of housing in their local regions and every county and city across the State is required by law to adequately plan for their fair share of needed housing.

The City must adequately plan for its existing and projected housing needs, including its share of the Regional Housing Needs Allocation (RHNA), as identified by the State with input from Southern California Association of Governments and local cities and counties. While the City does not build housing on property that is privately owned or owned by other government agencies, the State requires each local government to demonstrate where housing can reasonably be expected to be added within this cycle and how the City will facilitate and incentivize its production. As identified by the 6th Cycle RHNA, the City must plan for 2,513 housing units, which are further broken down by income level.

The City’s 6th cycle RHNA targets are broken down by income level as follows:

- Very-Low Income = 619 units
- Low Income = 409 units
- Moderate Income = 471 units
- Above Moderate Income = 1,014 units

## Housing Element Organization

The Housing Element identifies goals, policies, and programs to comprehensively address the housing needs of all current and anticipated residents at all income levels over the upcoming housing period between 2021 through 2029. The Housing Element is divided into chapters and supporting documentation is included as appendices of the Housing Element.

### Housing Element Content

- **Introduction** provides an overview of the Housing Element, its relationship to State law, the City's RHNA, and this section on the plan organization.
- **Public Engagement** describes the outreach process that was undertaken through the Housing Element update process, and the input received that informed the development of this plan.
- **General Plan Consistency** details those policies identified throughout the elements of the General Plan that guided the policies set forth in the Housing Element to ensure that consistency is maintained throughout the General Plan.
- **Goals and Policies** specifies the City's plans for meeting the existing and projected comprehensive housing needs of Highland.
- **Program Implementation** identifies the specific actions that will be implemented to ensure that Highland's housing needs are met within the planning period.

### Appendices

- **Appendix A - 5th Cycle Review** evaluates the efficacy of the 5th cycle housing element; the progress in plan implementation; and the appropriateness of the goals, policies, and programs.
- **Appendix B - Community Profile** accesses the housing need through detailed information on Highland's demographic characteristics and trends that influence supply and demand of various housing types.
- **Appendix C - Constraints and Zoning Analysis** details governmental and non-governmental constraints to the maintenance, improvement, or development of housing for all income levels.
- **Appendix D - Affirmatively Further Fair Housing Analysis** identifies disproportionate housing needs, including segregated living patterns, concentrated areas of poverty, disparities in access to opportunity, and displacement risk.
- **Appendix E - Sites Analysis and Inventory** describes the methodology by which the City can accommodate their RHNA targets and provides an inventory of the sites identified to meet the housing need.



- **Appendix F - Community Engagement Summary and Results** provides the detailed results of the outreach conducted for the update to the Housing Element.

## **Public Engagement**

The City conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Stay-at-home orders of 2020 and 2021 provided the City with opportunities to explore new avenues for public engagement and increased access for those that are traditionally not involved in the planning process. Outreach and formal engagement activities were held virtually across a variety of platforms, including an online survey, virtual community workshop, stakeholder interviews, public review period, and study sessions and public hearings.

The outreach conducted for the update to the Housing Element, engaged a broad range of community members and stakeholders alike, including, but not limited to public policy advocates and facilities providing homelessness services. The City cast a wide net to gain participation from all segments of Highland's interested parties. The extensive outreach process conducted for this Housing Element update has contributed to a set of meaningful goals, policies, and programs that reflect Highland's housing needs and the priorities and needs of all of those in Highland, including those with special needs and lower income populations. **Appendix F, Community Engagement Results**, provides a comprehensive summary detailing the outreach conducted as part of the update to the Housing Element and corresponding materials

## **General Plan Consistency**

The California Government Code requires that a General Plan prepared by a local government contain an integrated, internally consistent set of goals, policies, and programs. The structure of this element is built on the same foundation upon which all other elements of the plan were formed. In addition, the Housing Element goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Highland were designed through this coordination.

The City of Highland will maintain consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan. Under State law, the General Plan requires an annual review and report to examine amendments and implementation status. In line with the other General Plan elements, the goals of the Housing Element aim to:

- Meet existing housing needs;
- Plan for future growth;
- Protect and enhance Highland's neighborhoods; and
- Provide new housing opportunities

## **Goals and Policies**

### **Goal 1: A preserved and enhanced housing stock within high quality neighborhoods.**

Policy 1.1: Facilitate neighborhood improvement and connect residents to housing rehabilitation programs that offer financial and technical assistance to lower income households.

Policy 1.2: Encourage housing improvement, preservation, rehabilitation, and the replacement of substandard housing as a means to enhance quality of life in Highland.

Policy 1.3: Support housing and neighborhood quality through the enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.

### **Goal 2: A diverse range and adequate supply of housing types that aligns with the needs of all current and future Highland households.**

Policy 2.1: Bolster the City's affordable housing supply through regulatory tools that encourage the development of and funding for quality lower- and moderate-income housing preservation and development.

Policy 2.2: Provide a transparent, timely and cost-effective regulatory review process that facilitates housing development opportunities at all income levels.

Policy 2.3: Ensure new residential and mixed use developments are adequately served by park and recreation, libraries, transportation, public safety, and other public services and facilities.

Policy 2.4: Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, special Policy Areas identified in the Land Use Element, and areas with access to resources and amenities.

Policy 2.5: Encourage innovation and creativity in housing development through regulations that increase flexibility in the development approval process and allow the use of construction materials and techniques that reduce the cost of housing and its impact on the environment.

Policy 2.6: Provide adequate outreach to residents to preserve the City's factory-built housing stock and protect residents from displacement.

**Goal 3: A City with adequate sites and resources appropriate for accommodating a variety of housing types.**

Policy 3.1: Establish higher density nodes with increased housing capacity for a variety of housing types, including housing for lower-income households.

Policy 3.2: Ensure adequate capacity for the development of a range of housing types.

Policy 3.3: Expand the affordable housing stock and provide homeowners with an additional source of income by facilitating the construction of accessory dwelling units.

**Goal 4: An affordable housing supply that equitably meets the needs of extremely low-, very low-, low-, and moderate-income households.**

Policy 4.1: Improve quality of life for lower- and moderate-income Highland residents by increasing opportunities for the creation of lower-cost owner-occupied housing types and by providing housing assistance through the promotion of homeowner and renter assistance opportunities.

Policy 4.2: Provide regulatory and financial incentives to encourage and facilitate the development of affordable single-family, multifamily, and mixed-use housing.

Policy 4.3: Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of housing based on race, religion, or other protected classifications.

**Goal 5: A City with a broad range of housing types to meet the diverse needs of all Highland residents.**

Policy 5.1: Provide the regulatory framework necessary to facilitate special needs housing in Highland.

Policy 5.2: Encourage development of accessible housing for all levels of ability through regulatory relief.

Policy 5.3: Create a continuum of care for those experiencing homelessness in Highland through establishing a housing plan for homelessness including zoning districts allowing emergency shelters, low barrier navigation centers, transitional housing, and permanent supportive housing.

Policy 5.4: Support innovative public, private, and nonprofit efforts in the development and financing of affordable, special needs housing.

## Program Implementation

### ***Program 1: Homeowner Rehabilitation Program***

Homeowner Rehabilitation is offered through the Neighborhood Partnership Housing Services (NPHS) through the Renaissance Home Repair Loan. This loan is available to eligible households in the Inland Valley and provides up to \$25,000 per households to be used for financing home improvements, including health and safety repairs and energy efficiency upgrades. The San Bernardino County Community Development and Housing Department refers interested residents in need of assistance to this program.

The City will improve coordination with the County to identify opportunities for increased funding for homeowner rehabilitation. Further, the City will increase community awareness of available programs and refer interested residents to the County.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Engage in regularly scheduled meetings with County staff to discuss homeowner rehabilitation resources.</li> <li>• Partner with County to seek and apply for funding.</li> <li>• Post resources on City website.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Set up meetings with County staff within one year of Housing Element adoption and continue ongoing engagement and coordination.</li> <li>• Apply for funding by 2023</li> <li>• Update website within one year of Housing Element adoption.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.1, 1.2, 1.3

### ***Program 2: Residential Rental Enhancement and Rehabilitation Program***

The City's Residential Rental Enhancement Program (RREP) in conjunction with the crime free multiple-family rental housing program provides technical assistance to rental property owners on how to maintain their rental property and ensure that the property is free from crime. This includes a checklist that rental property owners are required to submit prior to the issuance of a business license certificate to ensure the property is free from health and safety hazards. Further the police department provides a free training on tenant screening and property safety measures.

The City will continue to provide this program to ensure that rental properties are maintained and that landlords have the resources they need to ensure their properties remain safe for

tenants. The City will also add to tenant screening training to provide guidance on Fair Housing to ensure that tenant screenings do not have a disproportionate negative affect on protected groups. The City will expand access to trainings by posting training materials on the City's website.

Further, the City will explore opportunities to use the in-lieu inclusionary housing fee to fund lower income rehabilitation for affordable multifamily developments in need of assistance.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Continue and expand upon RREP to provide Fair Housing guidance through two trainings per year and by requiring all landlords to complete the trainings.</li> <li>• Post resources on City website.</li> <li>• Where possible, allocate inclusionary funds to affordable multifamily development.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• RREP is an ongoing program.</li> <li>• Update website within one year of Housing Element adoption.</li> <li>• Annually evaluate opportunities to allocate funding.</li> </ul>
<b>Responsible Agency</b>	<ul style="list-style-type: none"> <li>• Police Department;</li> <li>• Community Development Department</li> </ul>
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.1, 1.2, 1.3

***Program 3: Code Enforcement***

The City implements a code enforcement program to assist property owners in addressing building and zoning code violations. When the City identifies substandard housing, the City initiates a substandard lien that prohibits the sale of the property until the condition is mitigated. Further the City conducts windshield surveys within neighborhoods identified to receive Community Development Block Grant funding.

The City's 2017 Quality of Life Initiative accelerated proactive code enforcements by hiring two additional full-time code enforcement officers and one police officer.

The City will further the Quality of Life Initiative by providing information to residents about how they can become code compliant without violations by detailing specific code compliance issues and options for how they can be resolved and will post information and resources regarding code compliance and property maintenance on the City's website.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Assist with bringing properties into compliance with the zoning code.</li> <li>• Post resources for code compliance on the City website and connect residents to such resources, when the property is at risk of being noncompliant with the zoning code.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing assistance to properties with code compliance issues.</li> <li>• Update City website within one year of Housing Element Adoption.</li> </ul>
<b>Responsible Agency</b>	Code Enforcement Division
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.1, 1.2, 1.3

***Program 4: Inclusionary Housing***

The City's Inclusionary Housing Ordinance requires that all new housing developments provide affordable units on-site, off-site, or pay an in-lieu fee which goes into the City's affordable housing preservation and construction fund. The City will continue to implement the Inclusionary Housing Ordinance and will identify affordable housing preservation, rehabilitation, and construction opportunities for the expenditure of acquired funds.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Continue to implement the Inclusionary Housing Ordinance.</li> <li>• Allocate funding to the preservation, rehabilitation, and construction of affordable housing, especially for extremely low-income households, when available.</li> </ul>
<b>Timeframe</b>	Ongoing implementation of ordinance and allocation of funding, when available.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Inclusionary Housing fee
<b>Relevant Policies</b>	2.1, 2.4, 2.6, 4.1, 4.2, 5.1

***Program 5: Impact Fees***

The City regularly reviews Development Impact Fees to ensure impact costs are appropriate to protect public services. The City will continue ongoing evaluation and updates to impact fees as necessary. Further, the City will focus future fee assessments to analyze fees as they relate to affordable housing and will evaluate opportunities to reduce fees for proposed affordable housing developments.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>Review fees after the budget cycle.</li> <li>Analyze fees for affordable housing, and reduce fees where feasible.</li> </ul>
<b>Timeframe</b>	Bi-annually
<b>Responsible Agency</b>	Public Works City Engineering Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.1, 2.2, 2.5

***Program 6: Density Bonus***

The City will review and amend the local Density Bonus Program Ordinance to ensure consistency with State requirements and will amend the ordinance, where needed.

<b>Objective(s)</b>	Update Density Bonus Ordinance, consistent with State law.
<b>Timeframe</b>	Within one year of Housing Element adoption
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department Budget
<b>Relevant Policies</b>	2.1, 2.5, 3.1, 4.3, 5.1

***Program 7: Housing Choice Voucher Referrals***

The City shall continue to support the Housing Authority’s Housing Choice Voucher program (Section 8 vouchers) by providing program information at City Hall and on the City’s website. The Housing Choice Voucher program pays rental subsidies directly to rental property owners to benefit lower income households. The City provides links on their website to the Section 8 housing choice voucher program and refers all inquiries to the Housing Authority. Further, the City will increase collaboration with the Housing Authority to assist in outreach to potential households as well as landlords that may participate in available programs.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Maintain relevant resources on the City website.</li> <li>• Refer interested residents.</li> </ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.1, 4.1, 5.4

***Program 8: By Right Development on Previously Identified Housing Sites***

Those qualifying sites identified in the inventory, which were previously identified in accordance with the specifications of Housing Element law, shall permit the development of housing by right where 20 percent of the total units in the development will be affordable to lower-income households, consistent with AB 1397 (2017). The City will review their processes and procedures to ensure that those uses eligible for by right development will not be subject to any conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a project as defined in Section 21100 of the Public Resources Code.

<b>Objective(s)</b>	Amend processes and procedures to permit qualifying developments in accordance with State requirements.
<b>Timeframe</b>	Ongoing through planning period
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department Budget
<b>Relevant Policies</b>	2.1, 2.2, 2.4, 3.2

***Program 9: Developer Outreach and Transparency***

The City will maintain current information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports, consistent with the requirements of AB 1483 (2019).

Further, the City will continue to offer an optional pre-application conference and advertise the benefits through the City's website and the "Come Home to Highland" website. A pre-application conference allows the applicant to receive invaluable comments from City staff prior to submitting a plan, thus reducing the time and cost associated with permit processing.



<b>Objective(s)</b>	Maintain the City's website with the most current information.
<b>Timeframe</b>	Ongoing through planning period
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.1, 2.2, 4.2, 5.1, 5.4

***Program 10: Innovative and Efficient Housing***

The City implements the most current California Green Building Standards Code. To further increase energy efficiency in housing, the City will coordinate with Southern California Edison (SCE) and The Gas Company to obtain the latest information on energy efficient building technology and will post information on the City's website to provide guidance and resources to property owners on energy efficient strategies and retrofits.

<b>Objective(s)</b>	Update the City's website.
<b>Timeframe</b>	Within one year of Housing Element update
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.5

***Program 11: Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas***

The City of Highland supports regional efforts for an improved public transportation network and greater linkages between transportation land use, and housing. The City will continue to work with SCAG, San Bernardino Associated Governments, Omnitrans, and neighboring communities to develop the Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas. The "Base Line Improvement Project" between the 210 Freeway and Cole Street was completed in 2015. The City in conjunction with SBCTA will complete the widening of Base Line at the 210 Freeway interchange, anticipated completion is 2022. The City will continue coordination to ensure that future transit aligns with the City's vision for growth.

<b>Objective(s)</b>	Coordinate quarterly meetings with appropriate agencies to coordinate land use and transportation planning and to advocate for the prioritization of projects that align with Highland’s vision.
<b>Timeframe</b>	Establish quarterly meetings by July 2023
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.3, 2.4, 3.1

***Program 12: Accessory Dwelling Units***

The City will review and amend the Zoning code to permit ADUs and JADUs in all zones that permit residential uses, consistent with State law, Government Code Section 65852.2.

<b>Objective(s)</b>	Review and revise the Zoning Code.
<b>Timeframe</b>	Within four years of Housing Element adoption
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.1, 2.4, 3.3, 4.2

***Program 13: Homeowner Assistance Programs***

The City will continue to provide resources to homeowners on the City's website to connect Highland residents with information on County homeowner assistance programs. This includes links on the City's website to resources on housing counseling services and other housing resources available through the County's Community Development and Housing department.

<b>Objective(s)</b>	Maintain resources on website.
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	4.1

***Program 14: Priority Services***

The City will coordinate with the East Valley Water District (EVWD) to ensure that proposed developments which include housing affordable to lower income households are prioritized for the provision of water and sewer services. The City will provide a copy of the updated Housing Element and assist with the identification of sites for prioritization of services through the updates to the Water and Sewer System Master Plans in accordance with SB 1087 (2004).

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Maintain a database of existing and proposed affordable housing developments.</li> <li>• Engage in the Water and Sewer System Master Plan updates.</li> </ul>
<b>Timeframe</b>	Submit the Housing Element to EVWD within one month of Housing Element adoption.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department Budget
<b>Relevant Policies</b>	2.3, 2.4

***Program 15: Fair Housing Mediation***

The City partners with the Inland Fair Housing and Mediation Board (IFHMB's) to provide fair housing services for its residents. The City will maintain this partnership and will provide information regarding available fair housing services on the City's website. The fair housing services provided by the IFHMB include providing information, investigation, education, conciliation, and/or referral of housing discrimination complaints free of charge to individuals. It also involves fair housing workshops that are offered year-round to educate housing providers, tenants, homeowners, and financial and lending institutions on the key aspects of fair housing law. Further, IFHMB's mediation department provides information to landlords, tenants, mobile home park owners, and mobile home residents regarding their rights and responsibilities under the California Landlord and Tenant Laws and facilitates negotiations between parties in housing-related disputes.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Continue to maintain information on the City's website.</li> <li>• Continue to partner with IFHMB.</li> </ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.6, 4.3

***Program 16: Affordable Housing Preservation Program***

No affordable units within Highland are at-risk of conversion to market rate during the 2021-2031 period. Therefore, the City's housing preservation efforts are focused on assisting homeowners that may be at risk of foreclosure. Subprime lending practices have resulted in numerous foreclosures throughout Highland. The City seeks to reduce foreclosures by providing educational information to its residents. The City will provide educational homeownership brochures and refer concerned homeowners and homebuyers to nonprofits such as Neighborhood Housing Services of the Inland Empire, Inc. and the Homeownership Preservation Foundation. Information will be made available at City Hall and on the City's website.

Additionally, the City will continue to monitor existing publicly assisted affordable housing and provide technical assistance for those that might convert to market rents and displace extremely low-, very low-, low-, and moderate-income tenants.

Further, the City will continue to refer residents to the County's website for information on housing advocacy groups, public agencies, and non-profit organizations.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Continue to maintain information on the City's website.</li> <li>• Maintain and monitor a list of affordable housing developments and year of possible expiration of deed-restriction or other assistance.</li> </ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.1, 1.2, 1.3, 2.1

***Program 17: Housing for Persons with Disabilities***

The City has adopted Reasonable Accommodation procedures that provide a process by which relief from land use, zoning, or building laws, rules, policies, practices, and/or procedures can be alleviated for those with a disabilities, including persons with developmental disabilities. The City will promote this procedure by providing a highlight on their website that is easily accessible.

Also, the City will continue to provide informational materials on Southern California Edison's Customer Assistance Program at City Hall and on the City's website. The program is designed to help persons with disabilities, including developmental disabilities, maintain low energy use. The program also targets low-income households, senior citizens, and non-English speaking customers.

Further, the City will continue to refer individuals and families with developmental disabilities to the Inland Regional Center in San Bernardino. The Inland Regional Center is the largest nonprofit, state-funded social service facility in the state that focuses on persons with developmental disabilities. The City will provide a link to the Inland Regional Center’s website on the City’s website.

Additionally, to further opportunities for persons with disabilities and older adults with varying levels of ability, the City will explore opportunities to connect residents to resources on increasing in-home accessibility by posting materials on their website related to home retrofit guidance and accessibility in Accessory Dwelling Units.

<b>Objective(s)</b>	Update the City’s website to provide information.
<b>Timeframe</b>	By 2023
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	4.3, 5.1, 5.2, 5.4

***Program 18: Residential Care Facilities***

The City will update the zoning code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. Additionally, the City will create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving 6 or fewer persons by right in all residential zones in accordance with the Welfare and Institutions Code Section 5116.

<b>Objective(s)</b>	The City will update the zoning code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. Additionally, the City will create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving 6 or fewer persons by right in all residential zones.
<b>Timeframe</b>	Within one year of Housing Element
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.4, 3.1, 3.2, 5.1

***Program 19: Emergency Shelters, Transitional Housing, and Permanent Supportive Housing***

The City will update relevant sections of the zoning code to ensure consistency with State law as it relates to Supportive Housing, Emergency Shelters, and Transitional Housing as follows:

- Permit Supportive Housing by-right in residential zones that permit multifamily uses and mixed uses zones that allow residential uses in accordance with AB 2162 (2018);
- Permit Emergency Shelters by-right in at least one zone and ensure that parking requirements accommodate the staff working in the shelter and do not require more parking than other residential or commercial uses within the same zone in accordance with AB 139 (2019);
- Permit Transitional Housing in the same manner as other residential uses in the same zone in accordance with AB 139 (2019).

<b>Objective(s)</b>	Amend the City's zoning code in conformance with State law.
<b>Timeframe</b>	Within one year of Housing Element
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	5.1, 5.3

***Program 20: Affordable Housing Partnerships***

The City will support creative models of affordable property ownership and affordable housing preservation through methods such as community land trusts. Informational resources will be provided on the City's website to connect lower-income households to housing advocacy groups, public agencies, and non-profit organizations in the event that opportunities for purchasing lower-income housing developments becomes available. The City will conduct outreach to housing advocacy groups to improve coordination and increase publication of how advocacy groups can assist residents.

Additionally, the City will continue to foster relationships with affordable housing property owners, tenants, and nonprofit organizations to assist in the long-term affordability of affordable developments.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Update the City’s website.</li> <li>• Conduct outreach to increase collaboration among the City’s partners.</li> </ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.2, 4.1, 5.4

***Program 21: Mobile Home Preservation***

Consistent with the provisions of Government Code Section 65863.7, the City shall require the submission of a report detailing the impacts of any proposed conversion of an existing mobile home park. The report shall include a replacement and relocation plan that mitigates the impact upon the ability of the displaced residents of the mobile home park to be converted or closed to find adequate housing in a mobile home park, consistent with the requirements of State law. The report as well as any adverse impacts on the housing supply, lower-income households, and on displaced persons shall be considered before the change of use can be approved. Further, the City shall require the replacement of any lost units to ensure no net loss of the City’s existing housing stock that is affordable to lower-income households.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Require a report for each proposed conversion or closure.</li> <li>• Consider the findings of the report as well as the impact on the existing housing supply, lower income households, and disabled persons.</li> </ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.2, 2.6

***Program 22: Collaborative Partnerships***

The City has administered funds for a variety of affordable housing needs such as construction costs, rent subsidies, and home improvement grants. Working in collaboration with other entities will help the City’s resources go further and meet the needs of additional lower-income households. The City will contact local affordable housing service providers to discuss partnering and continue to seek financial assistance from other agencies. The City will make relevant information available on their website as it relates to available funds.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Continue outreach to local affordable housing service providers.</li> <li>• Update the City’s website.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing outreach</li> <li>• Update website within one year of Housing Element adoption.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	4.1, 5.4

***Program 23: Lot Consolidation Incentive***

The City will provide a permit expedite incentive for lot consolidation for multifamily development on sites identified in the Housing Element as having the potential to accommodate lower or moderate-income units and will consider expanding this incentive to all lower-income and mixed income residential and mixed-use developments.

<b>Objective(s)</b>	The City will amend the code to incentivize lot consolidation on specified sites through an expedited development permit review process.
<b>Timeframe</b>	Within one year of Housing Element
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	2.1, 2.4, 4.2



***Program 24: Annual Progress Reports***

The City will continue to report annually on the City's progress toward its eight-year RHNA housing production targets, the remaining housing capacity, and toward the implementation of the programs identified in the Housing Element to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development in accordance with the requirements of AB 879 (2017).

<b>Objective(s)</b>	<ul style="list-style-type: none"><li>• Track housing production, remaining capacity, and program progress.</li><li>• Submit adopted Annual Progress Reports annually by April 1st.</li></ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	3.2

***Program 25: No Net Loss***

The City will utilize their development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under SB 166 (2017).

If at any time during the planning period, a development project results in fewer units by income category than identified in the sites inventory (Appendix E, Sites Analysis and Inventory) for that parcel and the City cannot find that the remaining sites in the housing element are adequate to accommodate the remaining RHNA by income level, the City will within 180 days identify and make available additional adequate sites to accommodate the remaining RHNA.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>Amend staff procedures to ensure all development proposals and rezone proposals are reviewed against the capacity identified for sites in the Sites Inventory (Appendix E).</li> <li>Develop a methodology for tracking remaining capacity.</li> </ul>
<b>Timeframe</b>	Tracking is ongoing and amendments to procedures will be implemented within one year of Housing Element adoption.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	3.2

***Program 26: Fair Housing Analysis***

The City will continue to contribute to the regional evaluation of discriminatory housing practices by participating in the County of San Bernardino Analysis of Impediments to Fair Housing. The Analysis of Impediments to Fair Housing identifies regulations or practices that may create an unequal housing environment in San Bernardino County communities.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>Coordinate annual meetings with County of San Bernardino and fair housing agencies.</li> <li>Regularly conduct Analysis of Impediments to Fair Housing Choice.</li> </ul>
<b>Timeframe</b>	<p>Within one year of Housing Element adoption.</p> <p>Update to the City’s Analysis of Impediments every 3 to 5 years.</p>
<b>Responsible Agency</b>	Community Development Department/ Housing Authority
<b>Funding Sources</b>	Community Development Department/ Housing Authority
<b>Relevant Policies</b>	4.3, 5.4

***Program 27: Replacement Requirements***

The City will mandate replacement requirements consistent with the Housing Crisis Act of 2019 for proposed housing developments on sites that currently have residential uses, or within the past 5 years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households. The City will consider reevaluation of this program upon sunset of this State requirement.

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>Amend staff procedures related to the review and issuance of demolition and development permits.</li> <li>Enforce replacement requirements in accordance with Government Code Section 66300.</li> <li>Consider a reevaluation of processes if the legislation sunsets.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend staff procedures within one year of Housing Element adoption, continue ongoing replacement requirements, reevaluate in 2025.</li> </ul>
<b>Responsible Agency</b>	Community Development Department/ Housing Authority
<b>Funding Sources</b>	Community Development Department/ Housing Authority
<b>Relevant Policies</b>	1.2, 2.1, 3.2

***Program 28: Low Barrier Navigation Centers***

Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The City will amend the zoning code to permit the development of Low Barrier Navigation Centers as a use by-right, without requiring a discretionary action, in mixed-use and non-residential zones that permit residential uses, consistent with AB 101(2019).

<b>Objective(s)</b>	Amend the zoning code, consistent with State requirements.
<b>Timeframe</b>	Within one year of Housing Element adoption
<b>Responsible Agency</b>	Community Development Department/ Housing Authority
<b>Funding Sources</b>	Community Development Department/ Housing Authority
<b>Relevant Policies</b>	5.1, 5.3

***Program 29: Affordable Housing Streamlining***

The City will amend their code to provide an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals. Further, the City will amend their internal procedures to include SB 35 (2017) streamlining in staff permitting process procedures.

<b>Objective(s)</b>	Amend the zoning code and staff procedures, consistent with State requirements.
<b>Timeframe</b>	Amendment to take place within one year of Housing Element adoption and streamlining availability to be ongoing.
<b>Responsible Agency</b>	Housing Authority
<b>Funding Sources</b>	Housing Authority
<b>Relevant Policies</b>	2.1, 2.2, 4.2

***Program 30: Objective Design Standards***

The City will increase transparency and certainty in the development process through objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official and shall be uniformly verifiable by reference to the City's regulations in accordance with the requirements of the Housing Crisis Act of 2019.

<b>Objective(s)</b>	Monitor zoning code amendments to ensure any new design standards are objective.
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	2.2, 2.5, 4.2

***Program 31: Surplus Lands***

The City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports in accordance with the requirements of AB 1486 (2019).

<b>Objective(s)</b>	Identify and track surplus City-owned sites.
<b>Timeframe</b>	Annually
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	2.4, 3.2, 4.2

***Program 32: Increased Transparency***

The City will maintain information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports in accordance with the requirements of AB 1483 (2019).

<b>Objective(s)</b>	<ul style="list-style-type: none"> <li>• Ensure all relevant information is provided on the City's website.</li> <li>• Continue to update information as changes are made and as it becomes available.</li> </ul>
<b>Timeframe</b>	Ongoing
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	2.4, 3.2, 4.2

***Program 33: Reduced Parking Requirements***

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations. The City will ensure that appropriate parking reductions apply to any development proposals that would eliminate religious-use parking spaces in exchanged for housing developments, in accordance with the requirements of AB 1851 (2020).

<b>Objective(s)</b>	Amend the zoning code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.
<b>Timeframe</b>	Within one year of Housing Element adoption
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	2.5, 3.2, 4.2, 5.4

# City of Highland

## 6<sup>th</sup> Cycle Housing Element Update

### Draft

### Appendices

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Appendix A: 5th Cycle Review

Appendix B: Community Profile

Appendix C: Constraints and Zoning Analysis

Appendix D: Affirmatively Furthering Fair Housing Analysis

Appendix E: Sites Analysis and Inventory

Appendix F: Community Engagement Summary

# Appendix A: 5th Cycle Review

For the 5<sup>th</sup> Cycle Housing Element (2014-2021), the City committed to specific programs to address the comprehensive housing needs of the City and to help achieve the goals identified in the 5<sup>th</sup> Cycle Housing Element. This section evaluates progress made toward the goals and actions of the 5<sup>th</sup> Cycle Housing Element and is used as a foundation to inform the programs of the 6<sup>th</sup> Cycle Housing Element (2021-2029) tailored to meet this cycle's housing needs. California Government Code Section 65588(a) requires each jurisdiction to regularly review its Housing Element and evaluate the following:

- The progress in implementation of the Housing Element;
- The effectiveness of the Housing Element programs in progress toward achieving the housing goals and objectives; and
- The appropriateness of the housing goals, objectives, policies, and in contributing to the attainment of the State housing goal.

This evaluation provides information on the extent to which programs have achieved stated objectives and whether these programs continue to be relevant to addressing current and future housing needs in the City of Highland (City). The success of a program toward achieving the 5<sup>th</sup> Cycle goals is the basis for the goals, policies, and programs and the establishment of objectives provided in the 6<sup>th</sup> Cycle. **Table 1** lists each program from the 2014-2021 Housing Element and identifies the program progress, effectiveness, and appropriateness. The goals, policies, and programs of the 6<sup>th</sup> Cycle Housing Element are reflective of the program effectiveness as determined by this evaluation.

**Table 1. Review of 2014-2021 Housing Element Past Accomplishments**

Policy (if applicable)	Program	Progress in Implementation
<b>Goal 8.1 - Preserve and enhance the quality and character of Highland’s housing stock and existing residential neighborhoods.</b>		
<p>Provide neighborhood improvement and unit rehabilitation programs that offer financial and technical assistance to lower income single-family homeowners and owners of rental housing.</p>	<p><b>1 Single-Family Rehabilitation</b>  <b>1A.</b> Seek funding resources to continue to implement single-family rehabilitation programs that provided lower and moderate income homeowners with rehabilitation grants and loans (formerly funded by the Redevelopment Agency). Repairs include—but are not limited to—room additions, septic systems, paint and stucco, acoustic ceilings, roofing, and pest control.                      Timing/Objective: Identify funding by 2016                      Responsible Agency: Community Development Department                      Funding Source: Grants, Inclusionary Housing In-Lieu Fees, and other alternatives will be explored</p>	<p><b>Progress:</b> The City provided information to residents on County programs for which Highland residents were eligible. These included weatherization and senior rehabilitation programs.  <b>Evaluation:</b> Several programs were previously funded by redevelopment agency. The City’s Inclusionary Housing In-Lieu fees have been dedicated to the construction of new affordable housing units. The San Bernardino County Community Development and Housing Department refers interested residents in need of assistance to the Neighborhood Partnership Housing Services (NPHS) program, which offers the Renaissance Home Repair Loan of up to \$25,000 for eligible households in the Inland Valley to be used for financing home improvements, including health and safety repairs, code compliance, and energy efficiency upgrades.  <b>Appropriateness:</b> Revise and continue to increase coordination with the County.</p>
<p>Provide neighborhood improvement and unit rehabilitation programs that offer financial and technical assistance to lower income single-family homeowners and owners of rental housing.</p>	<p><b>1 Single-Family Rehabilitation</b>  <b>1B.</b> Continue to participate in the “World Changers” Program which rehabilitates homes for low to moderate income residents.                      Timing/Objective: Approximately 5 homes per year                      Responsible Agency: Community Development Department                      Funding Source: General Fund</p>	<p><b>Progress:</b> The program was terminated due to loss of the Redevelopment Agency and cessation of the Immanuel Baptist Church “World Changers” Program. No new funding sources have been identified.  <b>Evaluation:</b> Since the City has not identified funding and the Church has ceased participation in this program it is no longer effective in assisting low to moderate income residents.  <b>Appropriateness:</b> Delete.</p>
<p>Provide neighborhood improvement and unit rehabilitation programs that offer financial and technical assistance to lower income single-family homeowners and owners of rental housing.</p>	<p><b>2 Rental Rehabilitation</b>  <b>2A.</b> The City of Highland has a significant number of rental properties in certain areas of the community that are in disrepair and in need of rehabilitation. The City’s current rehabilitation programs focus on ownership units but do not extend to rental units. Working in tandem with the rental inspection program, a rental-oriented program could</p>	<p><b>Progress:</b> The City adopted the Residential Rental Enhancement Program (RREP; Ordinance 412 and Ordinance 440), and Section 5.34.020, Crime Free multiple-family rental-housing program (Ordinance 402), of the Highland Municipal Code (HMC) to provide technical</p>



	<p>greatly improve the condition of the existing housing stock and quality of life for Highland's renter community. Therefore, the City will develop a program to assist the rehabilitation of single- and multifamily rental housing.</p> <p>Timing/Objective: Adopt program guidelines by March 2014. Seek funding in fiscal year 2014/2015.</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: General Fund, Grants, Inclusionary Housing In-Lieu Fees, and other alternatives will be explored</p>	<p>assistance to property owners of rental units on how to maintain and keep their property safe.</p> <p><b>Evaluation:</b> The City has been unable to secure funding for a financial assistance program. However, this policy also focuses on providing technical assistance to renters. The Residential Rental Enhancement Program (RREP) and the crime free multiple-family rental-housing programs are designed to assist property owners of rental units to maintain and keep their property safe. The RREP includes a checklist of items that must be evaluated by the owner to ensure the property is safe from a health and safety perspective prior to the City issuing a business license certificate. The crime-free housing program administered by the Highland Police includes free training for rental managers on tenant screening and property safety measures.</p> <p><b>Appropriateness:</b> Modify through reference to County programs.</p>
<p>Encourage housing improvement and rehabilitation and the replacement of substandard housing as a means to enhance quality of life in Highland. Ultimately the health of the City's existing neighborhoods has great influence over who selects to reside, build, work, or start a business in Highland.</p>	<p><b>2 Rental Rehabilitation</b></p> <p><b>2B.</b> Continue rental inspection program to ensure a high level of rental property maintenance. Refer violators to the rental rehabilitation program that will be created as stated above.</p> <p>Timing/Objective: Ongoing 2014–2021.</p> <p>Responsible Agency: Code Enforcement Division</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> The program is on-going and has become a self-certification program by the property owner (RREP). See Progress on the RREP in Program 2A.</p> <p><b>Evaluation:</b> The program allows property owners to ensure high level of rental property maintenance.</p> <p><b>Appropriateness:</b> Continue and revise to incorporate Fair Housing guidance and to educate property owners by providing relevant information on the City's website.</p>
<p>Support housing and neighborhood quality through rigorous enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.</p>	<p><b>3 Code Enforcement</b></p> <p><b>3A.</b> Work with the State Franchise Tax Board in order to enforce the provisions of California Revenue and Taxation Code Section 17299 and 24436.5, which prohibit owners of substandard housing from claiming depreciation, amortization, mortgage interest, and property tax deductions on State income tax.</p> <p>Timing/Objective: Initiate coordination with Tax Board by December 2014 and establish program by June 2015</p> <p>Responsible Agency: Community Development Department</p>	<p><b>Progress:</b> In the City's experience with property owners with substandard housing, the properties are transferred to new owners prior to City's being able to enforce the California Revenue and Taxation Code. The City has instead initiated a step that includes the recordation of a substandard lien. The City will only release the lien when the substandard condition is mitigated.</p>

	Funding Source: General Fund	<p><b>Evaluation:</b> The City has not worked with the State Franchise Tax Board to enforce the California Revenue and Taxation Code.</p> <p><b>Appropriateness:</b> Continue and revise to connect property owners with available resources.</p>
Support housing and neighborhood quality through rigorous enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.	<p><b>3 Code Enforcement</b></p> <p><b>3B.</b> Perform annual windshield surveys to identify areas with substandard housing. A proactive approach will increase the ability of Code Enforcement staff to protect the City's existing housing stock from deterioration.</p> <p>Timing/Objective: Commence annual windshield surveys and identify services to assist the target areas within six months of adopting the Housing Element.</p> <p>Responsible Agency: Building &amp; Safety Division</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> This program is on-going. A database is available in the CDBG division and then assigned to a CE officer for the CDBG neighborhood. The CE officer is assigned full-time in a pro-active and reactive capacity. Additionally, in 2017, the City created the Quality of Life initiative, which included the hiring of 2 additional full-time code officers and a police officer. The initiative accelerated the proactive code enforcements efforts in the neighborhood. The program includes providing windshield surveys.</p> <p><b>Evaluation:</b> The City has been effective in proactively increasing CE staff abilities.</p> <p><b>Appropriateness:</b> Continue and revise to include the Quality of Life initiative effort and to work with residents on becoming compliant with the Code.</p>
Support housing and neighborhood quality through rigorous enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.	<p><b>3 Code Enforcement</b></p> <p><b>3C.</b> Continue to enforce the City's Property Maintenance Ordinance HMC Section 15.52 (minimum standards for exterior property maintenance). Owners of a property that does not meet the minimum requirements will be notified in writing by the Building Inspector or Code Compliance Officer and given a reasonable period of time to achieve compliance. Code violators will be provided with information on the Neighborhood Pride Grant program to assist them in completing repairs.</p> <p>Timing/Objective: Ongoing 2014–2021. Achieve 85% compliance rate.</p> <p>Responsible Agency: Code Enforcement Division</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> The City's code enforcement efforts are ongoing. The Neighborhood Pride Grant Program that was terminated in 2012 due to loss of the Redevelopment Agency.</p> <p><b>Evaluation:</b> The City has been unable to provide assistance to homeowners or renters to complete any necessary home repairs as part of the Neighborhood Pride Grant Program due to loss of funding but can work to connect residents with informational resources on home maintenance and code compliance.</p> <p><b>Appropriateness:</b> Continue and revise to include with above code enforcement programs to better connect residents and property owners to resources.</p>
Support housing and neighborhood quality through rigorous enforcement of building and property maintenance	<p><b>4 Neighborhood Quality</b></p> <p><b>4A.</b> Continue the Code Enforcement, Police, and Fire for Multi-Family Housing program to provide a multi-department, comprehensive</p>	<p><b>Progress:</b> The City has substituted a new program called "CPF for Multi-family Housing" (which involves Code, Police, and Fire) to improve individual multi-family projects.</p>

standards, the education of landlords and tenants, and the inspection of properties	<p>approach to resolving problems associated with deteriorating housing developments.</p> <p>Timing/Objective: Ongoing 2014–2021</p> <p>Responsible Agency: Code Enforcement Division</p> <p>Funding Source: General Fund</p>	<p>These are group enforcement efforts by the City's Code Enforcement, Police and Fire staff. They are coordinated with the property owner. Staff performs a group inspection, any deficiencies are identified, and a correction list provided. Follow-up inspections are performed by the relevant division.</p> <p><b>Evaluation:</b> This program is established and effective in coordination.</p> <p><b>Appropriateness:</b> Continue and revise to combine with code enforcement programs as on-going effort to identify deteriorating housing and programs to assist property owners and residents in resolving this issue.</p>
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**GOAL 8.2 - Facilitate the development of housing suitable for the diverse needs of current and future Highland residents.**

Bolster the City's affordable housing supply through regulatory tools that encourage the development of or funding for quality lower and moderate income housing development.	<p><b>5 Inclusionary Housing and Fees</b></p> <p><b>5A.</b> An Inclusionary Housing Ordinance requiring all new housing construction in the City to provide affordable units on-site, off-site (in special circumstances), or pay an in-lieu fee of \$3,750 per unit into the City's housing fund for the preservation and construction of affordable housing was adopted in 2006.</p> <p>Timing/Objective: Ongoing 2014–2021.</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: Development community</p>	<p><b>Progress:</b> The program is in-place and on-going. The current balance is approximately \$596,000.</p> <p><b>Evaluation:</b> The funds will be utilized to construct new affordable units at the Housing Authorities property at 7433 Central Avenue. The anticipated proposal will develop approximately 80 affordable dwelling units on 3.75 acres.</p> <p><b>Appropriateness:</b> Continue.</p>
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Bolster the City's affordable housing supply through regulatory tools that encourage the development of or funding for quality lower and moderate-income housing development.	<p><b>5 Inclusionary Housing and Fees</b></p> <p><b>5B.</b> Review the in-lieu fee established for the Inclusionary Housing Ordinance to ensure it remains appropriate. Explore opportunities to use the in-lieu fee to fund lower income rehabilitation programs previously funded by the Redevelopment Agency.</p> <p>Timing/Objective: Present review of the fee to City Council by December 2014; and biannually thereafter</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> The City continues to collect in-lieu fees under the Inclusionary Housing Ordinance.</p> <p><b>Evaluation:</b> The funds will be utilized to construct new affordable units at the Housing Authorities property at 7433 Central Avenue</p> <p><b>Appropriateness:</b> Continue and revise to combine with Program 5A.</p>
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Ensure new residential projects are adequately served by park and recreation, libraries, transportation,	<p><b>5 Inclusionary Housing and Fees</b></p> <p><b>5C.</b> Evaluate Development Impact Fees to ensure that such fees are the minimum necessary to cover actual costs, implement the General Plan, and to ensure protection of public health, safety, and welfare. Also</p>	<p><b>Progress:</b> Developer fee schedule was last updated in 2020 per City Council Resolution 2020-005 and 2020-006.</p> <p><b>Evaluation:</b> Review of fees occurs on a regular basis to ensure impacts costs are appropriate to protect public</p>
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<p>public safety, and other public services and facilities.</p>	<p>monitor permit processing times to identify areas in which the City can streamline development review.  Timing/Objective: Review bi-annually after the budget cycle.  Responsible Agency: Public Works/City Engineering Department  Funding Source: General Fund</p>	<p>services. This is a routine function and does not address development impact fees for affordable housing.  <b>Appropriateness:</b> Continue and revise program to focus on assessing fees as they relate to affordable housing and combine with Program 5A.</p>
<p>Bolster the City's affordable housing supply through regulatory tools that encourage the development of or funding for quality lower and moderate-income housing development.</p>	<p><b>5 Inclusionary Housing and Fees</b>  <b>5D.</b> Assist in the development of adequate housing to meet the needs of lower and moderate-income households by providing a comprehensive menu of opportunities. The City will specifically target service providers with experience in assisting extremely low-income households. These opportunities include, but are not limited to using housing in-lieu fees to support affordable housing projects, offering density bonuses, making Housing Choice Voucher referrals, redevelopment activities to build new affordable housing and subsidize existing housing, encouraging the development of second units, and facilitating the development of emergency shelters, transitional housing, permanent supportive housing, and single room occupancy units.  Timing: Various timeframes for individual projects throughout 2014–2021  Responsible Agency: Community Development Department  Funding Source: General Fund, Inclusionary Housing In-Lieu Fees, and other resources if available</p>	<p><b>Progress:</b> The City continues to evaluate in-lieu inclusionary fees. Density bonuses have been codified as part of the HMC and is on-going. Information regarding housing vouchers is not readily available on the City's website. Accessory dwelling unit development has been codified and was last amended in 2019 (HMC Section 16.44.180). The Land Use and Development Code was updated to permit emergency shelters in the Business Park District (Ordinance No. 376 adopted in February 2013). Also, a Draft Ordinance to update the zoning code to differentiate between residential care facilities serving six or fewer residents was completed and is pending adoption. Single room occupancy units are not included in the HMC.  <b>Evaluation:</b> The program lists several opportunities for providing adequate housing to meet the needs for lower and moderate-income residents. As of March 2021, 200 units are under construction as part of the San Carlos Apartments, located within the Greenspot Village Marketplace Specific Plan.  <b>Appropriateness:</b> Remove this program as each measure is included within another program.</p>
<p>Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.</p>	<p><b>6 Regulatory Relief</b>  <b>6A.</b> Continue to encourage the development of multifamily housing types by permitting such units by right in multifamily-zoned sites identified in the Housing Element (R-4 and HDS), pursuant to GC Section 65583.2 (h) and (l).  Timing/Objective: Maintain the permitted multifamily uses within R-4 and HDS zones as needed to exceed the RHNA for lower income households  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> Ordinance 362 added the "Residential High Density Special Overlay (HDS)" to the HMC section 16.16.020(G) and Zoning map. This HDS Overlay was also included into the Greenspot Village and Marketplace Specific Plan, adopted in June 2013. Multifamily housing is allowed with a Staff Review Permit in the R-4 zone.  <b>Evaluation:</b> Multifamily residential uses are permitted subject to approval of a staff review permit application in the R-4 zone and the HDS Overlay has been codified.</p>

		<b>Appropriateness:</b> Continue and revise to permit qualified housing by-right on previously identified sites create a new program tied to lot incentive, and another program related to permit streamlining.
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	<p><b>6 Regulatory Relief</b></p> <p><b>6B.</b> Continue to update the Land Use and Development Code to address updates to density bonus laws as needed. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: Community Development Department Budget</p>	<p><b>Progress:</b> Section 16.40.090, Development density of the Municipal Code was last updated in 2013. It is currently being updated to include the latest density bonus laws.</p> <p><b>Evaluation:</b> The City is in the process of updating its Density Bonus law pursuant to legislation passed by the State since the adoption of the City’s density bonus in 2013, including Assembly Bill’s 1763 and 2345. It is a City Work Program Item and anticipated to be complete within the second quarter of 2021.</p> <p><b>Appropriateness:</b> Continue under a separate program.</p>
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	<p><b>6 Regulatory Relief</b></p> <p><b>6C.</b> Incentivize lot consolidation for high density multifamily projects by expediting the process for sites identified in the Housing Element as having the potential to accommodate densities at or above 20 units per acre (shown in Appendix A). Timing/Objective: Codify expedited processing for lot consolidation applications including multifamily sites identified as having potential to accommodate lower income housing in the Housing Element for the purpose of facilitating larger multifamily projects by December 2014 Responsible Agency: Community Development Department Funding Source: General Fund</p>	<p><b>Progress:</b> The City has not codified incentives for lot consolidation in high density multifamily zone (R-4). However, the City incorporated the HDS Overlay into the Greenspot Village and Marketplace Specific Plan, adopted in 2013. The Specific Plan includes incentives for lot consolidation and requirements.</p> <p><b>Evaluation:</b> To date, this incentive has not been used.</p> <p><b>Appropriateness:</b> Modify so that expedited lot consolidation is available to all multifamily development proposals on sites Identified in the Sites Inventory to accommodate the lower and moderate income RHNA.</p>
-	<p><b>7 Developer Outreach</b></p> <p><b>7A.</b> Continue to offer an optional pre-application conference and advertise the benefits through the City’s website and the “Come Home to Highland” website. A pre-application conference allows the applicant to receive invaluable comments from City staff prior to submitting a plan, thus reducing the time and cost associated with permit processing. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund</p>	<p><b>Progress:</b> Pre-application process in place and on-going. Standing meetings every Thursday at 10am. Meetings are scheduled two weeks from receipt of project description.</p> <p><b>Evaluation:</b> The pre-applications meetings have been effective in the development process.</p> <p><b>Appropriateness:</b> Continue and revise to include documentation posting in accordance with the requirements of AB 1483 (2019).</p>

-	<p><b>7 Developer Outreach</b>  <b>7B.</b> Conduct an annual citywide analysis to assess and document the City's housing activities in an annual report to HCD.  Timing/Objective: Ongoing 2014–2014  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> This is an on-going process and is required by existing regulations.  <b>Evaluation:</b> Annual reviews are informative and provide no constraints to housing development. This is a routine function. This is required under state law and is not an additional program (Government Code Section 65400).  <b>Appropriateness:</b> Delete.</p>
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	<p><b>7 Developer Outreach</b>  <b>7C.</b> Continue to offer the City's brochure on zoning, development requirements, development fees, and permitting procedures in City Hall and online.  Timing/Objective: Ongoing 2014–2021  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> Information is available online.  <b>Evaluation:</b> Availability of procedures provides transparency of the City's development process. This is a routine function. Fees are required to be available online under state law.  <b>Appropriateness:</b> Continue and revise to include in one program and include requirements of AB 1483 (2019).</p>
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	<p><b>7 Developer Outreach</b>  <b>7D.</b> Continue to utilize a digital database to track development applications and periodically post summaries of this information in development activity reports on the City's website.  Timing/Objective: Ongoing 2014–2021  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> This is on-going. There is a PDF map available on the City's website that was last updated December 4, 2019.  <b>Evaluation:</b> The program ensures transparency; however, it is already included in program 9b.  <b>Appropriateness:</b> Revise to instead tie to capacity tracking to ensure no-net-loss.</p>
-	<p><b>8 Innovative and Efficient Housing</b>  <b>8A.</b> Encourage development on sites identified in the land resources section of the Housing Element by providing the inventory of the City's website.  Timing/Objective: Provide information on the City's website within three months of Housing Element adoption.  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> The City provides this information in an Appendix to the 2014-2021 Housing Element, which is posted on the City's website. In the summer of 2020, the City created a new webpage to make it easier for users to navigate information. The Existing Housing Element (5<sup>th</sup> Cycle) is located under the "General Plan" heading.  <b>Evaluation:</b> The City's new webpage has been effective in providing information to the public.  <b>Appropriateness:</b> Remove and create a separate program related to capacity tracking and ensuring no-net-loss.</p>
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and	<p><b>8 Innovative and Efficient Housing</b>  <b>8B.</b> Discuss mixed-use housing development opportunities with property owners in the Planned Development and Mixed-Use districts.  Timing: Conduct discussions by December 2015.  Responsible Agency: Community Development Department</p>	<p><b>Progress:</b> The City does not keep a record of continuing conversations.  <b>Evaluation:</b> The information provided to property owners in the Planned Development and Mixed-Use has incentivized mixed-use housing development along Base Line in the</p>

special Policy Areas identified in the Land Use Element.	Funding Source: General Fund	Towncenter Police Area and along Greenspot Road in the Golden Triangle. <b>Appropriateness:</b> Combine with Programs 16A, 16B, 20A, and 20B to discuss incentives for affordable housing and developing relationships with developers to facilitate affordable housing development. Promote mixed use housing developments within the Greenspot Village and Marketplace Specific Plan.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	<b>8 Innovative and Efficient Housing</b> <b>8C.</b> Explore opportunities for incentivizing residential green building and renovation efforts. Timing: This City Council goal was established for the 2009/2010 fiscal year. Ongoing 2014–2021. Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> The City adopted the most recent Green Building Code in 2019. <b>Evaluation:</b> The City has adopted the most recent Green Building Code and will defer to incentivizing measures mandated in the California Green Building Code. <b>Appropriateness:</b> Delete.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	<b>8 Innovative and Efficient Housing</b> <b>8D.</b> Continue to allow flexibility in design and development standards through the Planned Development (PD) district, Mixed Use district, and through policies provided in the Community Design Element of the General Plan. The PD zone facilitates more efficient use of the land and design superior to that which could be achieved through the application of conventional development standards. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> This effort is on-going. The Community Design Element was adopted in 2013 and has not been modified since the adoption of the 2014-2021 Housing Element to continue flexibility in design and development standards. <b>Evaluation:</b> The General Plan Policy descriptions in the Land Use Element have been more effective at establishing expectations for facilitating more housing types within the Planned Development (PD) district and Mixed-Use district. <b>Appropriateness:</b> Delete.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	<b>8 Innovative and Efficient Housing</b> <b>8E.</b> Contact Southern California Edison (SCE) and The Gas Company to obtain latest information on energy efficient building technology. Make this information available at City Hall and on the City's website. Timing/Objective: Provide information by January 2014 Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> The City has not provided information on energy efficient building technology on the website. <b>Evaluation:</b> This program has not been completed. <b>Appropriateness:</b> Continue and revise to focus on providing information related to energy efficient strategies to be implemented during construction or home modifications.
-	<b>8 Innovative and Efficient Housing</b> <b>8F.</b> Reduce energy waste by reviewing all residential buildings for compliance with Title 24, State of California Energy Standards. Timing/Objective: Ongoing 2014–2021	<b>Progress:</b> The City has adopted the most current California Green Building Standards Code. <b>Evaluation:</b> The adoption of current Green Code is complete. Implementation of the existing code is ongoing.

	Responsible Agency: Building & Safety Division Funding Source: General Fund	<b>Appropriateness:</b> Delete.
<b>GOAL 8.3 - Identify land uses and available land resources appropriate for accommodating a variety of housing types.</b>		
Establish higher density nodes with new housing opportunities intended to serve all income levels.	<b>9 Residential High Density Special Overlay (HDS)</b> <b>9A.</b> The City will continue the Residential High Density Special Overlay in the Golden Triangle Policy Area, which accommodates up to 650 multifamily units. Timing/Objective: Ongoing Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> The Residential HDS Overlay in the Golden Triangle Policy Area was established by City Council Ordinance No. 361 and No. 362. <b>Evaluation:</b> City Council Ordinance No. 361 and No. 362 completed this program, and it is no longer necessary to continue through the 6 <sup>th</sup> cycle Housing Element. <b>Appropriateness:</b> Delete.
-	<b>9 Residential High Density Special</b> <b>9B.</b> The City will continue to implement a formal ongoing monitoring procedure to ensure sufficient residential capacity for units affordable to lower income households is maintained on sites identified to accommodate the RHNA. Where an approval of a development (residential, commercial, or other) on a site identified as having lower-income potential in Appendix A results in a reduction of potential affordable units below the residential capacity needed to accommodate the RHNA, the City will identify and designate additional sites to accommodate the shortfall. The City will report on the status and implementation of the Housing Element including development occurring on identified sites, to determine whether development is occurring at densities consistent with the buildout projections described in Appendix A (in accordance with Government Code Section 65583 (a)(3) and 65583.2(h) and (l). As necessary, the City will identify alternate sites or densities to ensure that higher density multifamily housing remains a realistic and viable development strategy. Timing/Objective: Establish a Housing Element Site Monitoring Program concurrently with amendments to the Land Use and Development Code and Zoning Map as detailed in Program action 9a. Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> The City's website continues to provide a PDF of the housing developments within the City. <b>Evaluation:</b> Approval process for development projects will continue to monitor affordable units. <b>Appropriateness:</b> Remove and instead include a program to ensure no-net-loss of needed capacity throughout the 6 <sup>th</sup> cycle.
-	<b>10 Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas</b> <b>10A.</b> The City of Highland supports regional efforts for an improved public transportation network and greater linkages between	<b>Progress:</b> The City continues to work with SCAG, San Bernardino Associated Governments, Omnitrans, and neighboring communities to develop the Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas.



	<p>transportation land use, and housing. In August 2012, the City completed a Southern California Association of Governments Compass Blueprint Demonstration Project that explored bringing bus rapid transit to the Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas of Highland. The City will continue to work with SCAG, San Bernardino Associated Governments, Omnitrans, and neighboring communities to encourage transit-oriented development in the Inland Empire.</p> <p>Timing/Objective: Ongoing 2014–2021. Continue to collaborate with SCAG, SANBAG, Omnitrans, and Policy Area property owners</p> <p>Responsible Agency: Community Development</p> <p>Funding Source: General Fund (original project funding was provided through SCAG via grants from the U.S. Department of Transportation)</p>	<p>The “Base Line Improvement Project” between the 210 Freeway and Cole Street was completed in 2015.</p> <p><b>Evaluation:</b> Review of the current land use map in conjunction with transit stops indicates there is greater potential for mixed-use development along Baseline, west of Palm.</p> <p><b>Appropriateness:</b> Modify to update language.</p>
<p>Provide a variety of home building opportunities for a range of housing types.</p>	<p><b>10 Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas</b></p> <p><b>10B.</b> The Compass Blueprint Demonstration Project involved creating 3-D models and videos of the Base Line corridor and what it could look like after residential, mixed use, and commercial infill development and multimodal transit improvements. The City will leverage this digital resource to attract new residential and mixed use development to the area and inspire existing property owners to reinvest in their housing structures.</p> <p>Timing/Objective: Post videos online and share them with the Chamber of Commerce and other interested parties by 2014</p> <p>Responsible Agency: Community Development</p> <p>Funding Source: General Fund (original project funding was provided through SCAG via grants from the U.S. Department of Transportation)</p>	<p><b>Progress:</b> The City is currently working on updates to the website. The “Base Line Improvement Project” between the 210 Freeway and Cole Street was completed in 2015.</p> <p><b>Evaluation:</b> This program is an ongoing priority for the City and continued updates are underway.</p> <p><b>Appropriateness:</b> Combine into one program to focus on coordination with relevant agencies.</p>
<p>Expand the affordable housing stock and provide homeowners with an additional source of income by facilitating the construction of second dwelling units.</p>	<p><b>11 Second Units</b></p> <p><b>11A.</b> Continue to encourage the development of attached or detached second units in accordance with HMC Section 16.44.180 Second Units Ordinance.</p> <p>Timing/Objective: Maintain advertisement of the Second Unit Ordinance on the City’s website and the “Come Home to Highland” website</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> Between 2015 to 2020, the City approved 8 accessory dwelling units (ADU). Additionally, the City’s ADU ordinance was updated in 2019.</p> <p><b>Evaluation:</b> More recent updates to ADU laws will require additional amendments to the City’s ADU ordinance. In 2018 3 accessory dwelling units were approved, 2 ADUs were approved in 2019, 5 were approved in 2020, and 4 ADUs have been approved to date as of March 2021.</p>

		Interest in ADU development is increasing as awareness in the community becomes more prevalent. <b>Appropriateness:</b> Modify to amend the ADU ordinance consistent with State law, Government Code Section 65852.2.
<b>Goal 8.4 - Assist in the provision of adequate and affordable housing for all Highland residents.</b>		
Improve quality of life for lower and moderate income Highland residents through providing homeownership assistance and promoting County homeowner and renter assistance opportunities.	<b>12 Homeowner Assistance Programs</b> <b>12A.</b> Provide additional homeownership resources to Highland residents by providing information on County homeowner assistance programs at City Hall and on the City's website. Timing/Objective: Update website in January 2014 Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> On-going. There is a link on the City's website to the County's Community Development and Housing Homepage, Housing Resources, Housing Counseling Services, Section 8 Housing Choice Voucher Programs <b>Evaluation:</b> Residents can readily find this information on the City's website and it has been implemented. <b>Appropriateness:</b> Continue.
Improve quality of life for lower and moderate income Highland residents through providing homeownership assistance and promoting County homeowner and renter assistance opportunities.	<b>13 Renter Assistance</b> <b>13A.</b> Support the Housing Authority's Housing Choice Voucher program (Section 8 vouchers) by providing program information at City Hall and on the City's website. The Housing Choice Voucher program pays rental subsidies directly to rental property owners to benefit lower income households. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	<b>Progress:</b> The Housing Programs section of the City's website directly provides a link to the Housing Authority of the County of San Bernardino's website which provides information for the Housing Authority's Housing Choice Voucher program (Section 8 vouchers) <b>Evaluation:</b> Residents can readily find this information on the City's website and it has been implemented. <b>Appropriateness:</b> Continue and revise to focus on Housing Choice Voucher referrals and continued maintenance of the existing webpage.
-	<b>14 Priority Services</b> <b>14A.</b> Provide the Housing Element to the City's water and sewer service providers and assist them in drafting policies to provide priority water and sewer service to affordable housing projects. Timing/Objective: Provide housing element and offer assistance upon adoption Responsible Agency: Community Development Department Funding Source: Community Development Department Budget	<b>Progress:</b> The 2014-2021 Housing Element was provided to water and sewer for preparation of the 2019 Water System Master Plan and 2019 Sewer System Management Plan. <b>Evaluation:</b> The program is effective in ensuring utility providers account for changes to land use to provide adequate water and sewer service to affordable housing projects. <b>Appropriateness:</b> Continue.
Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of	<b>15 Fair Housing Mediation</b> <b>15A.</b> Increase awareness of the City's partnership with the Inland Fair Housing & Mediation Board (IFHMB) by providing a link to their website	<b>Progress:</b> The City provides a link to the IFHMB website under Housing Programs on the City's website.

<p>housing based on race, religion, or other arbitrary classification.</p>	<p>(www.ifhmb.com) on the City's website and include an article regarding IFHMB services in the City's annual newsletter. The City will make fair housing brochures available at Highland City Hall, Highland Senior Center, Highland Library, Highland Family YMCA, and the Police Station. The City will continue to refer Highland residents, tenants, landlords, and property owners to IFHMB to assist in resolving fair housing issues. Timing/Objective: Update website and provide brochures by January 2014 Responsible Agency: Community Development Department Funding Source: General Fund</p>	<p><b>Evaluation:</b> The City has met the objectives of this program in providing information regarding IFHMB services. <b>Appropriateness:</b> Continue and revise to focus on continued maintenance of information on the City's website and to continue the City's partnership with IFHMB.</p>
<p>Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of housing based on race, religion, or other arbitrary classification.</p>	<p><b>15 Fair Housing Mediation</b> <b>15B.</b> Contribute to the regional evaluation of discriminatory housing practices by participating in the County of San Bernardino Analysis of Impediments to Fair Housing. The Analysis of Impediments to Fair Housing identifies regulations or practices that may create an unequal housing environment in San Bernardino County communities. Timing/Objective: Complete according to the County's schedule Responsible Agency: Community Development Department Funding Sources: General Fund</p>	<p><b>Progress:</b> The County of San Bernardino Analysis of Impediments to Fair Housing Report was completed in 2015 and involved public outreach. <b>Evaluation:</b> The City continues to participate in the evaluation of discriminatory housing practices through the Regional Analysis of Impediments to Fair Housing Choice. <b>Appropriateness:</b> Continue under a separate program.</p>
<p>-</p>	<p><b>16 Housing Preservation Program</b> <b>16A.</b> Subprime lending practices have resulted in numerous foreclosures throughout Highland. The City seeks to reduce foreclosures by providing educational information to its residents. The City will provide educational homeownership brochures and refer concerned homeowners and homebuyers to nonprofits such as Neighborhood Housing Services of the Inland Empire, Inc. and the Homeownership Preservation Foundation. Information will be made available at City Hall and on the City's website. Timing/Objective: Provide information by January 2014 Responsible Agency: Community Development Department Funding Source: General Fund</p>	<p><b>Progress:</b> This is on-going. Updates to the website have not yet been made. <b>Evaluation:</b> The City is unable to record the number of foreclosures reduced through the City's provision of educational materials to residents. Nonetheless, the program is effective in disseminating information to homeowners and homebuyers. <b>Appropriateness:</b> Continue and revise to continue to refer residents to assistance and other resources and to update the City's webpage to better connect residents to information and resources.</p>
<p>-</p>	<p><b>16 Housing Preservation Program</b> <b>16B.</b> The affordability covenant at Raintree Apartments is expected to expire in 2020. The City will establish a program to provide outreach to owners of affordable projects, such as this one, to ensure that they</p>	<p><b>Progress:</b> The City negotiated with the ownership of Raintree Apartments but was unable to secure an Agreement.</p>

	<p>understand ways to ensure affordability, such as partnering with or selling to the City or an affordable housing organization. The program will include providing owners of affordable projects with a list of affordable housing developers and organizations. An informative letter will be issued to relevant affordable housing organizations.</p> <p>Timing/Objective: Establish program and provide information by January 2016</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: General Fund</p>	<p><b>Evaluation:</b> The City conducted outreach with Raintree Apartments but was unable to secure a partnership.</p> <p><b>Appropriateness:</b> Continue and revise to focus on reducing foreclosures by providing educational information to residents and to monitor affordable housing.</p>
-	<p><b>16 Housing Preservation Program</b></p> <p><b>16C.</b> In the event that the affordability covenants at Raintree Apartments are planned to expire, the City will notify local affordable housing entities in an effort to attract interest and resources for preserving the units. The California Department of Housing and Community Development maintains a list of qualified entities. These organizations are leaders in obtaining, maintaining, and managing affordable housing developments and are logical partners for the City, the property owner, and other interested nonprofits.</p> <p>Timing/Objective: Reach out to qualified entities, if needed, by 2018.</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> The City negotiated with the ownership of Raintree Apartments but was unable to secure an Agreement.</p> <p><b>Evaluation:</b> New affordable housing entities have not been attracted through this program; however, the City continues to track a list of Low and moderate-income housing with long-term covenants in the City which is available on the City website.</p> <p><b>Appropriateness:</b> Delete. The program is no longer needed specific to Raintree Apartments, as program 20A will continue to monitor existing publicly assisted affordable housing in the City.</p>
<b>GOAL 8.5 - Facilitate the development of a broad range of housing types to meet the special needs of Highland residents.</b>		
Encourage development of accessible housing for the disabled through regulatory relief.	<p><b>17 Housing for Disabled Persons</b></p> <p><b>17A.</b> Enact a process for disabled individuals, including persons with developmental disabilities, or those acting on their behalf to make requests for reasonable accommodation in regard to relief from the various land use, zoning, or building laws, rules, policies, practices, and/or procedures of the City. This process will include a review of the zoning code for compliance with fair housing laws and procedures for assisting those making the request, and a procedure for appeals.</p> <p>Timing/Objective: February 2013</p> <p>Responsible Agency: Community Development Department</p> <p>Funding Source: General Fund</p>	<p><b>Progress:</b> The City is in compliance with all new disability laws and policies (HMC 16.40.090, Reasonable Accommodations).</p> <p><b>Evaluation:</b> This program has been codified into a process for providing reasonable accommodations for disabled individuals.</p> <p><b>Appropriateness:</b> Modify to continue to connect households with information on how to maintain low energy use to reduce energy costs and explore opportunities to connect residents to resources on in-home accessibility.</p>
-	<p><b>17 Housing for Disabled Persons</b></p> <p><b>17B.</b> Provide informational materials on Southern California Edison's Customer Assistance Program at City Hall. The program is designed to</p>	<p><b>Progress:</b> This program is ongoing.</p> <p><b>Evaluation:</b> The City is uncertain if Highland resident's enrollment in the program is due to the informational</p>

	<p>help persons with disabilities, including developmental disabilities, control their energy use. The program also targets low income, senior citizens, and non-English speaking customers.  Timing/Objective: Ongoing 2014–2021  Responsible Agency: Building &amp; Safety Division  Funding Source: General Fund</p>	<p>materials at City Hall. However, the program is effective for transparency purposes.  <b>Appropriateness:</b> Modify to combine with programs to provide informational materials on the City's website.</p>
-	<p><b>17 Housing for Disabled Persons</b>  <b>17C.</b> Refer individuals and families with developmental disabilities to the Inland Regional Center in San Bernardino. The Inland Regional Center is the largest nonprofit, state-funded social service facility in the state that focuses on persons with developmental disabilities. Provide a link to the Inland Regional Center's website on the City's website.  Timing/Objective: Ongoing 2014–2021  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> This program is ongoing.  <b>Evaluation:</b> The City continues to refer individuals and families with disabilities to the Inland Regional Center in San Bernardino.  <b>Appropriateness:</b> Modify to combine with other programs for housing for persons with disabilities.</p>
Provide the regulatory framework necessary to facilitate special needs housing in Highland.	<p><b>18 Residential Care Facilities</b>  <b>18A.</b> Update the zoning code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. Create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving 6 or fewer persons by right in all residential zones.  Timing/Objective: Amend the Land Use and Development Code by January 2013  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> This item has not been codified. It is on a comprehensive Code update that has been drafted, but not yet approved by management or the City Attorney to move forward to public hearing.  <b>Evaluation:</b> As this has not yet been codified, its evaluation is unable to be determined.  <b>Appropriateness:</b> Modify to update timeframe.</p>
Creation of a continuum of care for the homeless in Highland through establishing a housing plan for the homeless including zoning districts allowing emergency shelter, transitional housing, and permanent supportive housing.	<p><b>19 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing</b>  <b>19A.</b> Address the urgent shelter needs of the homeless by updating the Land Use and Development Code to permit emergency shelters in the Business Park district, which has the capacity to provide at least one year-round shelter for the City's 112 homeless persons. Address transitional housing needs by permitting transitional housing and permanent supportive housing by right of zone.  Timing/Objective: Amend the Land Use and Development Code by January 2013  Responsible Agency: Community Development Department</p>	<p><b>Progress:</b> Emergency shelters (of 25 persons or less) are allowed in the Business Park district through Department Review. Transitional housing and permanent support type housing facilities are excluded from the Business Park district. Supportive and transitional housing is allowed in residential through Staff Review in the Agricultural Equestrian (A/EQ) district, R-1, Village Residential (VR) district, and East Highland Village (EHV) district. All other residential zones require a conditional use permit, and thus, are not permitted by-right.</p>

	Funding Source: General Fund	<p><b>Evaluation:</b> The program has been effective in implementation and has led to the establishment of two transitional housing facilities.</p> <p><b>Appropriateness:</b> Modify to latest updates to legislation.</p>
Creation of a continuum of care for the homeless in Highland through establishing a housing plan for the homeless including zoning districts allowing emergency shelter, transitional housing, and permanent supportive housing.	<p><b>19 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing</b></p> <p><b>19B.</b> The City has established an emergency shelter, transitional housing, and permanent supportive housing subcommittee to prepare a study evaluating model ordinances, case studies, zoning districts, and development standards to encourage and facilitate these forms of special needs housing (including single room occupancy units) in accordance with Senate Bill 2. The subcommittee is preparing a plan to meet Highland’s emergency shelter, transitional housing, and permanent supportive housing needs. The plan will include amending the Land Use and Development Code to permit emergency shelters without discretionary approval in the Business Park district, conditionally permit single room occupancy units in the Business Park district, and permit transitional and permanent supportive housing as residential uses subject to the same approval process and restrictions as similar residential uses in the same zone (based on unit type). Timing: Amend the Land Use and Development Code by January 2013 Responsible Agency: Community Development Department Funding Source: General Fund</p>	<p><b>Progress:</b> Emergency shelters (of 25 persons or less) are allowed in the Business Park district through Department Review. Single room occupancy units are not permitted in the Business Park district. Supportive and transitional housing are allowed in select residential through Staff Review in the A/EQ, R-1, VR, and EHV districts. All other residential zones require a conditional use permit.</p> <p><b>Evaluation:</b> Under state law, transitional and supportive housing must be treated as a residential use in all zones that allow residential uses and be permitted under the same restrictions as residential uses of the same type in the same zone. Under bill AB 2162 and AB 2988, supportive housing meeting specific standards shall be a use by right in zones where emergency shelters are permitted, and in all zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.</p> <p><b>Appropriateness:</b> Modify to combine with 19A and include amendments to the Land Use and Development Code to comply with current State law requirements for transitional, supportive and emergency shelters.</p>
-	<p><b>20 Affordable Housing Preservation</b></p> <p><b>20A.</b> Continue to monitor existing publicly assisted affordable housing and provide technical assistance for those that might convert to market rents and displace extremely low, very low-, low-, and moderate-income tenants. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund</p>	<p><b>Progress:</b> The City keeps track of low- and moderate-income housing with long-term covenants. This program is on-going.</p> <p><b>Evaluation:</b> The program has proven difficult to monitor for the City.</p> <p><b>Appropriateness:</b> Modify to coordinate with the Housing Authority to facilitate monitoring existing affordable housing and combine with Program 16Band 16C.</p>
-	<p><b>20 Affordable Housing Preservation</b></p> <p><b>20B.</b> Update contact list of housing advocacy groups, public agencies, and non-profit organizations to have available in the event of</p>	<p><b>Progress:</b> The City refers residents to the County’s website to search for housing advocacy groups, public agencies, and non-profit organizations.</p> <p><b>Evaluation:</b> It is unclear if the program has been effective.</p>

	<p>opportunities for purchasing or managing lower income housing projects.  Timing/Objective: Update contacts annually, ongoing 2014– 2021.  Responsible Agency: Community Development Department  Funding Source: Community Development Department Budget</p>	<p><b>Appropriateness:</b> Modify to creating relationships with affordable housing advocacy groups through affordable housing partnerships. The city will initiate partnerships and continue to work with owners, tenants, and nonprofit organizations to assist in the long-term affordability of affordable developments.</p>
-	<p><b>20 Affordable Housing Preservation</b>  <b>20C.</b> Continue to update a list of all available lower and moderate-income housing assistance programs and make the list available on the City's website and during developer pre-application conferences.  Timing/Objective: Ongoing 2014–2021  Responsible Agency: Community Development Department  Funding Source: Community Development Department Budget</p>	<p><b>Progress:</b> The City provides a link to the County's website and individual assistance programs.  <b>Evaluation:</b> The links are a good source of information that are kept updated by the County.  <b>Appropriateness:</b> Modify to continue providing up to date links and information on City's website and merge with program 20B.</p>
-	<p><b>21 Mobile Home Preservation</b>  <b>21A.</b> Based on the provisions of Government Code Section 65863.7, require the submission of a report detailing the impacts of any proposed mobile home park conversion with the filing of any discretionary permit.  Timing/Objective: Require a report for each proposed conversion.  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> The program is on-going as needed.  <b>Evaluation:</b> The program is effective as a regulatory tool to preserve the mobile homes and should be continued under state law.  <b>Appropriateness:</b> Continue.</p>
-	<p><b>21 Mobile Home Preservation</b>  <b>21B.</b> Require all condominium and mobile home conversion applicants to relocate displaced residents to the extent required by law.  Timing/Objective: Implement on a project-by-project basis throughout the planning period.  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> The program is on-going as needed.  <b>Evaluation:</b> This program is required by state law. However, this program is a routine function and not applicable as a Housing Element program.  <b>Appropriateness:</b> Continue.</p>
-	<p><b>21 Mobile Home Preservation</b>  <b>21C.</b> Define and distinguish manufactured housing from mobile homes and travel trailers, as set forth in current HUD codes, and define the process for approving or disapproving such uses to comply with state law.  Timing/Objective: Adopt definitions and permitting procedures by January 2014.  Responsible Agency: Community Development Department  Funding Source: General Fund</p>	<p><b>Progress:</b> HMC Section 16.06 has separate definitions for manufactured house and mobile home. Under manufactured home notes "For floodplain management purposes, the term "manufactured home" also includes park trailers, travel trailers and other similar vehicles placed on a site for greater than 180 consecutive days."  <b>Evaluation:</b> The definition of a " Dwelling unit" in the City's code includes mobile homes and therefore does not</p>

		<p>preclude a mobile home from being developed in zones that permit single-family uses.  <b>Appropriateness:</b> Delete.</p>
<p>Support innovative public, private, and nonprofit efforts in the development and financing of affordable, special needs housing</p>	<p><b>22 Collaborative Partnerships</b>  <b>22A.</b> The City has administered funds for a variety of affordable housing needs such as construction costs, rent subsidies, and home improvement grants. Working in collaboration with other entities will help the City's resources go farther and meet the needs of additional lower income households. The City will contact local affordable housing service providers to discuss partnering and continue to seek financial assistance from other agencies.  Timing/Objective: Ongoing 2014–2021  Responsible Agency: Community Development Department  Funding Source: Community Development Block Grants, HCD Emergency Housing Assistance Program, and Federal Emergency Shelter Grants and others</p>	<p><b>Progress:</b> Most recent partnership with Community Housing and Corporation for Better Housing. Negotiation Agreement approved partial grant funding in place. Unfortunately, the project was financially infeasible. The City is now partnering with an alternative developer - Housing Ventures. In preliminary negotiations.  <b>Evaluation:</b> The program is effective in collaborative efforts to bring resources for lower income households to the City.  <b>Appropriateness:</b> Continue.</p>



# Appendix B: Community Profile

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# 1 Introduction

The Housing Technical Report for the City of Highland (City) is a description and analysis of demographic, employment, and housing characteristics that influence housing demand, housing affordability, and housing needs. The Technical Report includes an evaluation of existing and projected housing needs and the potential constraints to meeting them. The findings in this report are the foundation for establishing meaningful goals, policies, and programs in the City's Housing Element.

## 1.1 Overview

Incorporated in 1987, the City has strived to become a high-quality community for families to call home. The City boasts historic neighborhoods, master planned communities, mountain views, and a rich history dating back to the late-1800s.

The City has seen significant changes in its housing market and housing conditions during the last decade. Housing prices have steadily rebounded following the drastic decline of the 2008 market downturn. Housing and apartment rents have also increased over the last few years. Although Highland has only been a City for 35 years, much of the housing stock on the west side predates incorporation so the revitalization of housing is also a local concern.

The Housing Technical Report provides the foundation for the Housing Element to address the following planning issues in the City, in accordance with State law. The Housing Technical Report examines the demographic profile of the City, the existing housing stock, special needs groups, and existing affordable housing developments to understand demographic and housing characteristics and effectively evaluate housing and community needs. Through this examination, the Housing Technical Report lays the foundation for goals, policies and programs to address the following issues in the City:

- Adapting to changing housing market conditions.
- Meeting state-mandated regional housing needs goals.
- Furthering quality housing and neighborhoods.
- Accommodating social and economic diversity.
- Assisting residents with special housing needs.

## 1.2 Data Sources

Various sources of information have been consulted in preparing this Housing Element. The 2010 Census provides the basis for population and household characteristics. Where applicable, the following sources of information have been used to supplement and update information contained in the 2000 and 2010 Census:

- Southern California Association of Government's (SCAG's) Adopted Growth Forecast, 2016
- SCAG's Pre-Certified Local Housing Data for the City of Highland, 2020
- US Bureau of Labor Statistics Longitudinal Employment and Household Dynamics, 2017
- Employment Development Department (EDD) State of California, 2020
- SCAG Connect SoCal, 2020
- California Department of Finance 2010 and 2020 Composition of Housing Stock, 2020
- California Department of Housing & Community Development (HCD) Income Limits, 2020

- US Census American Community Survey, 2019
- Department of Finance vacancy rates, 2020
- Home pricing information was obtained from CoreLogic, Zillow, and Redfin, 2020
- Guidestone Mortgage Calculator, 2020
- Bankrate Mortgage Calculator, 2020
- California Department of Social Services Care Facility Search, 2020
- San Bernardino County 2020 Homeless County and Subpopulation Survey, 2020
- SCAG 2018 Household Income Distribution Based on County Annual Median Income, 2018
- RentCafe Average Rents, 2020
- Lands of America, 2021
- Department of Housing and Urban Development (HUD) Fair Market Rents, 2020
- Realtor.com Market Trends, 2020
- Mortgage Bankers Association Mortgage Credit Availability Index, 2020
- Home Mortgage Disclosure Act, 2019
- International Code Council Square Foot Construction Costs, 2019
- East Valley Water District Sewer and Water System Master Plan, 2019
- San Bernardino Valley Regional Urban Water Management Plan, 2015
- Zumper Average Rent in Highland, 2021
- California Housing Partnership Los Angeles County Annual Affordable Housing Outcomes Report, 2020

### 1.3 Public Participation

California law requires that local governments include public participation as part of the Housing Element. Specifically, Government Code 65583(c)(7) states “that the local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” State law does not specify the means or methods for participation; however, it is generally recognized that the participation must be inclusive.

The City encourages and solicits the participation of the community and other local agencies in the process of identifying housing and community needs. To initiate community input, the City provided information regarding the Housing Element update on the City’s website under “6<sup>th</sup> Cycle Housing Element Update” in the Planning Department section. The City’s website provides a link to an online survey presented in English and in Spanish. Additionally, the City’s website directs viewers to contact the City’s Associate Planner for further information.

Two public meetings were held during preparation of the Housing Element update. The public meetings were noticed in local newspapers, on the City’s website, and at the required public facilities. These public hearings offer the community additional opportunities to participate in program development and raise their concerns about the future of housing in Highland. Rather than conducting an in-person meeting, the Governor’s Executive Order N-25-20 allows local governments to hold meetings via teleconferencing while still meeting state transparency requirements. Therefore, the public meetings were held in a virtual format. A detailed summary of the City’s Housing Element outreach including presentation materials are available in **Appendix F – Community Outreach Summary**.

## 2 Demographic Profile

A successful strategy for improving housing conditions must be based on an assessment of existing and future housing needs. An evaluation of the City’s demographic characteristics provides insight into the City’s population that will influence the development of responsive housing goals, policies, and programs.

### 2.1 Population Growth

According to the Census, the City of Highland’s population grew 19 percent from 44,625 in 2000 reaching 53,104 in 2010. The City’s population reached 55,323 in 2020, an additional 4.2 percent increase. Although a major local employment center, Norton Air Force Base, closed in 1994, the City’s population has continued to grow due to the development of former orchards in east Highland.

New population growth in the City and other Inland Empire communities, is in part due to the availability of more affordable home prices. Individuals and families will often relocate to the Inland Empire for home ownership opportunities as they are priced out of Los Angeles and Orange County. As the City pursues infill development and continues to develop remaining vacant land in the east, population growth will continue to occur, but at a slower rate than in decades past. Southern California Association of Government’s (SCAG) estimates the City’s population will grow to 65,700 by 2035, an 18.8 percent increase from 2020. **Table 1, Population Growth 2000-2035**, summarizes these population estimates for Highland from 2000 to 2035.

Table 1. Population Growth 2000-2035			
2000	2010	2020	2035
44,625	53,104	55,323	65,700
--	+19%	+4.2%	+18.8%

Source: SCAG 2020, 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction

### 2.2 Age Characteristics

Age distribution is an important factor in determining the size, type, and tenure of housing needed in a community. Census data indicates that although the under 18 population has declined since 2010; this age group continues to be the largest cohort in the City. The decline in children is potentially related to the low increase in the number of individuals in the family-forming age group over the last decade. Unlike most cities without a 4-year university, the City has experienced a steady increase in college-age residents. This may be the result of local students staying at home and commuting to school rather than relocating closer to campuses, such as California State University, San Bernardino and University of Redlands; or young persons joining the workforce rather than leaving for higher education.

Reflective of the baby boom generation, the middle-aged and senior groups are the fastest growing groups. Middle-aged residents typically increase the demand for single-family, detached homeownership opportunities, but as children leave, they may begin downsizing and changing the housing type demand, such as to condominiums. Although the senior population makes up under 10 percent of the City’s total population, this age group specifically experienced the largest percent increase between 2010 and 2018.

Table 2. Age Characteristics 2000-2018							
Age Group	2000		2010		2018		Change '10-'18
	Number	Percent	Number	Percent	Number	Percent	
Children and Youth (under age 18)	15,875	35.6%	18,259	34.9%	16,142	29.4%	-5.5
College Age (Ages 18–24)	4,013	9.0%	5,028	9.6%	5,911	10.8%	1.2
Family-Forming Adults (Ages 25–44)	13,377	30.0%	14,087	26.9%	14,173	25.8%	-1.1
Middle Age Adults (Ages 45–64)	8,453	19.0%	11,383	21.8%	13,173	24.6%	2.8
Senior Adults (Ages 65+ and above)	2,887	6.5%	3,584	6.8%	5,146	9.4%	2.6
<b>Total</b>	<b>44,605</b>	<b>100%</b>	<b>52,341</b>	<b>100%</b>	<b>54,859</b>	<b>100%</b>	--
Median Age	27.9		29.7		32.4		4.5
Source: US Census Bureau							

The City’s age profile suggests a need for affordable, single-family home ownership opportunities, such as attached single-family homes and family-sized rentals. The family-forming and middle-aged groups typically create demand for housing in units large enough to accommodate children (two or more bedrooms).

These prime working age groups tend to have higher incomes and larger household sizes than their younger and older cohorts. Census data indicates that in 2018, the median household income for family-forming adults was \$54,513 and \$74,201 for middle age adults, compared to \$47,168 for senior adults and \$30,833 for 15 to 24-year-old youth and college aged households. With growing populations and lower median household incomes for the senior adults and college aged groups, there may be a growing demand for multifamily rental housing, accessory dwelling units, and senior housing.

### 2.3 Race and Ethnicity

Like much of southern California, The City is becoming more racially and ethnically diverse. As of 2018, City residents who identified as White made up the majority of the racial composition of the total population, but the number of Hispanic residents (who may be of any race) increased significantly more than any other race from 2010 to 2018 and made up about 53 percent of the total population in 2018.

**Table 3, Ethnicity 2000-2018**, shows the City’s racial and ethnic trends from 2000 to 2018.

Table 3. Ethnicity 2000–2018							
	2000		2010		2018		Change '10-'18
	Number	Percent	Number	Percent	Number	Percent	
White	25,089	56.2%	28,225	53.9%	32,712	59.6%	5.7
Black or African American	5,403	12.1%	4,833	9.2%	4,578	8.3%	-0.9
American Indian and Alaska Native	581	1.3%	257	0.5%	757	1.4%	0.9
Asian	2,740	6.1%	3,527	6.7%	4,523	8.2%	1.5
Native Hawaiian and Other Pacific Islander	152	0.3%	211	0.4%	599	1.1%	0.7
Other Alone	8,307	18.6%	13,063	25.0%	8,937	16.3%	-8.7
Two or more races	2,333	5.2%	2,225	4.3%	2,753	5.0%	0.7
<b>Total</b>	<b>44,605</b>	<b>100%</b>	<b>52,341</b>	<b>100%</b>	<b>54,859</b>	<b>100%</b>	--
Hispanic Origin <sup>1</sup>	16,342	36.6%	25,309	48.4%	29,111	53.1%	4.7

Source: US Census Bureau  
<sup>1</sup> Persons of Hispanic origin may be of any race or multiple races.

## 2.4 Employment Characteristics

Census estimates for 2018 identify 40,518 people aged 16 and older in the labor force, a steady increase from 2010 (see **Table 4, Employment Status for City Residents over 16**). The increase in employed persons may correlate to the City’s growing middle-aged population and the development of industrial spaces and offices in the City and throughout the Inland Empire. Overall, the City’s general labor force characteristics and unemployment rates were virtually unchanged between 2010 and 2018.

Table 4. Employment Status for City Residents over 16 2000–2018							
Labor Force	2000		2010		2018		Change '10-'18
	Number	Percent	Number	Percent	Number	Percent	
In Armed Forces	27	0.1%	14	0.04%	16	0.04%	-0.0%
Civilian–Employed	17,058	56.4%	21,349	58.66%	22,953	56.65%	-2.0%
Civilian–Unemployed	1,978	6.5%	2,570	7.06%	2,562	6.32%	-0.7%
Not in Labor Force	11,204	37.2%	12,461	34.24%	14,987	37%	2.8%
<b>Total</b>	<b>30,267</b>	<b>100%</b>	<b>36,394</b>	<b>100%</b>	<b>40,518</b>	<b>100%</b>	--

Source: US Census Bureau

According to the Bureau of Labor Statistics, in 2017 the majority of the City’s residents in the labor force, approximately 96 percent, were employed outside of the City and only approximately 4 percent were employed inside of the City. As shown in **Table 5, Employment Profile**, the largest percentage of Highland’s population was employed in health care and social assistance industries, followed by retail trade and accommodation and food services. The largest percentage of jobs offered in the City are also in the health care and social assistance industries, followed by retail trade and accommodation and food service. Several medical facilities are located in the area, including Patton State Hospital Dignity Health - Community Hospital of San Bernardino, and associated supportive services. The majority of persons employed (62 percent) within the City reside in San Bernardino County and 21 percent reside in Riverside County.

<b>Table 5. Employment Profile 2017</b>				
<b>Industry</b>	<b>Jobs held By Residents</b>		<b>Jobs Offered in City</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
Health Care/Social Assistance	2,955	18.1%	1,371	29.1%
Retail Trade	2,210	13.6%	688	14.6%
Accommodation & Food Service	1,660	10.2%	865	18.4%
Administration & Support, Waste Management and Remediation	1,536	9.4%	378	8.0%
Transportation and Warehousing	1,500	9.2%	81	1.7%
Manufacturing	1,203	7.4%	231	4.9%
Construction	1,087	6.7%	354	7.5%
Wholesale Trade	979	6.0%	37	0.8%
Professional, Scientific & Technical Services	758	4.7%	166	3.5%
Finance & Insurance	448	2.8%	107	2.3%
Educational Services	325	2.0%	26	0.6%
Real Estate, Rental & Leasing	243	1.5%	36	0.8%
Management of Companies & Enterprises	232	1.4%	0	0.0%
Arts, Entertainment & Recreation	204	1.3%	58	1.2%
Information	190	1.2%	7	0.1%
Agriculture, Forestry, Fishing & Hunting	152	0.9%	0	0.0%
Utilities	56	0.3%	16	0.3%
Mining, Quarrying, Oil & Gas Extraction	17	0.1%	104	2.2%
Public Administration	0	0.0%	0	0.0%

Source: US Bureau of Labor Statistics Longitudinal Employment and Household Dynamics 2017.

American Community Survey income data from 2018 indicates that the median household income was \$59,395; however, more than half of employed City residents have relatively low-paying jobs that could result in challenges to affording adequate housing, depending on the incomes of other household members (if other household members are wage earners). In 2018, approximately 10 percent of households earned a median household income of \$14,999 or less, and approximately 32 percent earned between \$15,000 and \$49,999. Some, generally, low-wage earning occupations such as medical assistant, sales clerk, and cashier are common in the industries primarily employing City residents—health care, retail trade, and accommodation & food service.

### 2.4.1 COVID-19 Impact on Employment Trends

On March 19, 2020 Governor Gavin Newsom of California issued a Stay at Home Order (Executive Order N-33-20) to protect the health and well-being of all Californians and to establish consistency across the state in order to slow the spread of COVID-19. The sudden emergence of the COVID-19 pandemic resulted in significant increases in unemployment throughout the US. According to the EDD Bureau of Labor Statistics, the City’s unemployment average of 1,000 persons (3.8 percent) in 2019 increased to 2,200 persons (9 percent) for the month of January 2021<sup>1</sup>.

<sup>1</sup> Data from the EDD for Cities and CDPs is limited to not seasonally adjusted labor force and unemployment rates.



## 2.5 Household Type and Size

A household consists of all persons residing in a dwelling unit, regardless of relationship. Household type and size affect the type of housing and number of bedrooms per unit demanded in the community. According to SCAG’s Pre-Certified Local Housing Data, there were 15,932 total households in the City in 2018.

Families comprise the majority of the households in the City. As shown in **Table 6, Household Size**, the Census estimates report that 72 percent of family households consist of two to four members; however, five or more people households (28 percent) are the most commonly occurring household size. These small families range from couples of any age to families with children, and therefore could be served by a variety of housing types. In the City, families typically create demand for single-family rentals and ownership opportunities in single-family detached units or amenity-rich single-family attached projects.

An estimated 28 percent of the City’s family households are large families of five or more persons. Large families, particularly those with children, typically seek homeownership opportunities in single-family detached homes for the space and financial investment benefits. However, since more income is needed to support more people, many large families face financial hardship in affording adequately sized housing, a topic discussed later in this report.

Nonfamily households, which often consist of individuals living alone or with unrelated persons, make up 20 percent of the City’s total households. The majority of nonfamily households, 83 percent, are one-person households, accounting for 16.7 percent of Highland’s total households (a lower share of single-person households than the SCAG region overall (16.7 percent vs. 23.4 percent). One-person households generally seek small housing units, such as apartments, accessory dwelling units, and condominiums.

Table 6. Household Size 2018				
Household Size	Family		Nonfamily	
1 Person	0	0.0%	2,655	82.7%
2 Person	3,437	27%	438	13.6%
3 Person	3,086	24.3%	62	1.9%
4 Person	2,649	20.8%	44	1.4%
5 or More Persons	3,548	27.9%	13	0.4%
<b>Total</b>	<b>12,720</b>	<b>100%</b>	<b>3,212</b>	<b>100%</b>
Average Household Size	3.4			

Source: US Census Bureau

## 2.6 Household Income Trends

Household income is a critical factor in determining housing opportunity. As shown in **Table 7, Household Income**, Census estimates show the City’s 2018 median income was \$59,395, which was slightly lower than San Bernardino County’s median income of \$60,164. Almost a third of the City’s households earned annual incomes of \$100,000 or more. These upper income households have access to the greatest variety of housing types, sizes, and amenities. However, the two largest percentage of the City’s households were in the “less than \$25,000” category (22 percent), followed closely by those earning between \$25,000 and \$49,999 (20 percent). These households are likely to face difficulty in affording housing regardless of household size.

Table 7. Household Income 2018		
Household Income	2018	
	Number	Percent
Less than \$25,000	3,505	22%
\$25,000 – \$49,999	3,250	20.4%
\$50,000– \$74,999	2,724	17.1%
\$75,000 – \$99,999	1,466	9.2%
\$100,000 – \$149,999	2,724	17.1%
\$150,000 – \$199,000	1,209	7.6%
\$200,000 or more	1,052	6.6%
<b>Total</b>	<b>15,932</b>	<b>100%</b>
Median Income	\$59,395 <sup>1</sup>	

Source: US Census Bureau  
<sup>1</sup> In 2018 Inflation-Adjusted Dollars.

### 3 Housing Profile

This section describes and evaluates housing characteristics to identify existing trends and potential needs. These characteristics include housing growth, housing age and condition, housing prices and rents, tenure, and vacancy. Understanding housing trends can indicate the City’s ability to meet future housing needs.

#### 3.1 Housing Growth

The amount and type of housing available within a community reflect the existing housing stock’s ability to serve expected population growth and a range of incomes, lifestyles, and family types and sizes.

The City’s housing stock was shaped by the City’s history as an agricultural area. In the 1940s, large citrus groves gave way to suburban neighborhoods in west Highland. Housing growth moved east, eventually stopping at City Creek. Housing development east of City Creek primarily occurred decades later, spurred by the development of the East Highlands Ranch community in the 1980s. This pattern of housing growth resulted in essentially two “Highlands”: the west side has established neighborhoods and the east side has master planned communities.

Recent housing growth primarily consists of single-family neighborhoods in planned unit developments. Housing growth to meet the needs of various income levels and household sizes in the City is currently not met by the predominant single-family housing type stock. Infill development opportunities are located in west Highland. Larger development opportunities are generally on the east side. A specific plan and several planned developments in progress on the east side will offer a range of housing types from single-family detached homes to multifamily units.

As shown in **Table 8, Composition of the Housing Stock**, according to SCAG estimates the City had an estimated total of 16,578 units in 2010. In 2018, the total of estimated units grew to 16,845, representing a 1.6 percent increase. All of the City’s housing growth occurred in single-family detached and attached units with a total of 267 units. The largest portion of the City’s overall housing stock consists of single-family detached units, comprising 78.6 percent of the City’s housing stock, which is higher than the 61.7 percent share in the SCAG region.

Table 8. Composition of the Housing Stock					
	2010		2020		% Change
	Number	Percent	Number	Percent	
Single-Family	12,969	78.2%	13,236	78.6%	2.1%
Detached	12,670	76.4%	12,866	76.4%	1.5%
Attached	299	1.8%	370	2.2%	23.7%
Multifamily	2,654	16.0%	2,654	15.8%	0.0%
2-4 Units	678	4.2%	678	4.0%	0.0%
5+ Units	1,976	11.9%	1,976	11.7%	0.0%
Mobile Homes	955	5.8%	955	5.7%	0.0%
<b>Total</b>	<b>16,578</b>	<b>100%</b>	<b>16,845</b>	<b>100%</b>	<b>--</b>

Source: SCAG Local Housing Data

### 3.2 Age of the Housing Stock

Providing safe and attractive housing improves quality of life for residents. One measure of housing condition is age. As shown in **Table 9, Age of Housing Stock**, the City experienced a boom in housing construction between the 1980s, and 1990s.

Units constructed 30 years ago often require minor rehabilitation to comply with new safety standards and repair signs of inadequate maintenance. Housing units over 50 years of age are more likely to be in need of substantial rehabilitation. According to Census estimates, 12 percent of the City’s housing stock was built within the last 20 years, almost 40 percent was built between 20 to 40 years ago, and almost half was built over 40 years ago. Based on the City’s west-to-east development pattern, it can be assumed that these older units are primarily in west Highland.

Table 9. Age of Housing Stock		
Year Built	Number	Percent
2014 or later	71	0.4%
2010 to 2013	88	0.5%
2000 to 2009	1,799	10.7%
1990 to 1999	3,373	20.0%
1980 to 1989	3,226	19.1%
1970 to 1979	1,917	11.3%
1960 to 1969	2,414	14.3%
1950 to 1959	2,209	13.1%
1940 to 1949	972	5.8%
1939 or Earlier	822	4.9%
<b>Total</b>	<b>16,891</b>	<b>100%</b>

Source: US Census Bureau, 2018.

### 3.3 Tenure and Vacancy

Ownership rates reflect the ability of the housing stock to meet the needs of households looking for investment or those not ready for the responsibilities, cost, or permanence of home ownership.

As shown in **Table 10, Occupied Units**, homeownership rates decreased, and the share of renters increased by 3 percent between 2010 and 2018. During the 1990s, owner-occupancy rates in the City increased as more single-family homes were built. This development trend resulted in a relatively high percentage of owner-occupied units. Although the type of housing primarily developed in Highland favors homeownership, in recent years the single-family detached housing stock has begun to provide renter

opportunities in the form of homes available for lease. Investors purchasing homes with the intention to lease them results in single-family housing renter opportunities. However, an increase in investor-owned homes reduces the likelihood for housing turnover and may further burden renters that are unable to secure housing at a more appropriate size and cost. Overall, the number of renter-occupied units in the City increased by almost 900 between 2010 and 2018; however, the share of renters in the City is lower than in the SCAG region overall with 47.5 percent renters.

Table 10. Occupied Units				
Tenure	2010		2018	
	Number	Percent	Number	Percent
Owner-Occupied	10,014	68.2%	10,382	65.2%
Renter-Occupied	4,675	31.8%	5,550	34.8%
<b>Total</b>	<b>14,689</b>	<b>100%</b>	<b>15,932</b>	<b>100%</b>

Source: US Census Bureau

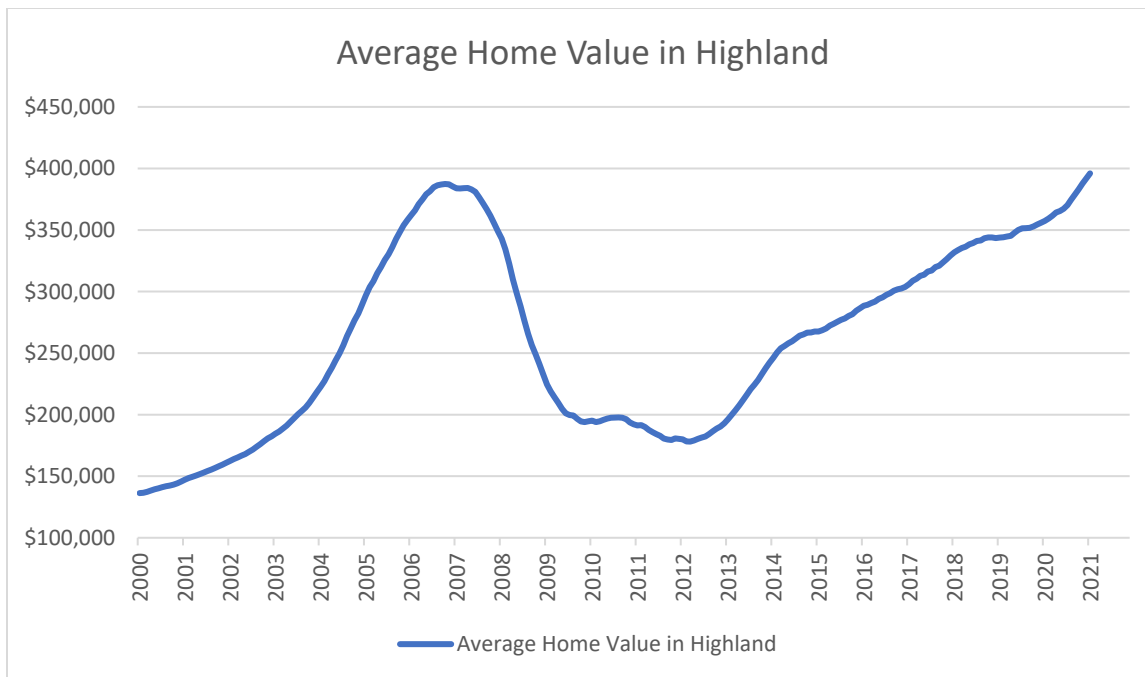
The vacancy rate is a strong indicator of the housing market and the ability for the housing stock to accommodate changing housing needs. A high vacancy rate can contribute to more affordable housing, while a low vacancy rate indicates that housing demand exceeds supply, leading to a tighter market with fewer opportunities. In general, an optimal vacancy rate is 2 percent for owner-occupied housing and 7 to 8 percent for rental units in a mature community, which indicates a stable housing market. A vacancy rate above 12 percent is considered to be high. Healthy levels of vacancy are considered when ensuring sufficient residential mobility and housing choice while providing adequate financial incentive for landlords or owners to maintain and repair their homes.

According to 2018 American Community Survey estimates, 5.7 percent of all units were vacant in the City. The overall homeowner vacancy rate was 0.4 percent, and the overall rental vacancy was 5 percent, making up nearly a third of the city’s total vacant units. This vacancy rate signifies a low vacancy rate and is much lower than the 2010 rental vacancy rate of 10.3 percent following the 2008 Great Recession.

According to the Department of Finance, the 2020 overall vacancy rate in the City remained at 5.7 percent. In comparison, San Bernardino County had a much higher vacancy rate (11.6 percent).

### 3.4 Housing Price and Affordability

The City’s housing costs for ownership and rental units fluctuated greatly over the last two decades. Housing costs for ownership and rental units at the end of the 2000’s underwent unprecedented changes that improved the affordability of housing for low-, moderate-, and above moderate- income residents. Between 2000 and 2021, typical home value in the City fluctuated greatly, as shown in the **Figure 1, Average Home Value In Highland**, below. Overall, typical home value increased from \$140,530 in 2000 to \$396,000 in 2021. The following describes the affordability of the City’s housing.



**Figure 1. Average Home Value in Highland**

Source: Zillow Home Value Index, 2020

### 3.4.1 Home Purchase Price

Historically, the City has attracted residents for its quality and affordable housing prices and rents. In the City, much like other cities in the Inland Empire, there was a period in the early 2000s when housing prices soared. Much of the appreciation was due to rising housing demand throughout the region, the availability of lower interest loans, and the desirability of new housing products on the market. However, with the downturn in the California economy and collapse of the housing market, home sales prices bottomed out in 2012 to reflect the oversupply of single-family detached homes and shortage of qualified buyers.

According to Zillow Home Value Index, median home sales price for existing homes was as low as \$178,088 in 2012. As the economy recovered, low interest rates and a growing economy enabled more people to buy a home, yet home building was slow to recover following the 2008 recession, leading to a limited increase in supply. Overall, demand outpaced supply and median home sales price steadily rose 93 percent to \$343,000 by 2018. According to Zillow estimates, median home value in Highland was \$357,000 in January 2020.

According to CoreLogic, the median sales price of single-family residences and condos as well as new homes in October 2020 was \$397,500, similar to the median home price of \$400,000 for the County of San Bernardino. These median home sales prices and how they compare to a year prior are shown in **Table 11, Home Sales Prices October 2020**.

Table 11. Home Sales Prices October 2020		
County/City	Median Price <sup>1</sup>	Change Since 2019
City of Highland	\$397,500	13.6%
County of San Bernardino	\$400,000	14%

Source: CoreLogic, October 2020.  
<sup>1</sup> Single-Family Detached and Condos

### 3.4.2 Housing Affordability

The affordability of housing is determined by market prices and current residents' ability to pay. To facilitate the analysis of income distribution among households in communities, the State Department of Housing and Community Development (HCD) groups households into categories by income. Income categories are determined as a percentage of the Area Median Income (AMI) and then adjusted for household size in the following manner:

- Extremely Low Income - less than 30% of the AMI
- Very Low Income - between 31% and 50% of the AMI
- Low Income - between 51% and 80% of the AMI
- Moderate Income - between 81% and 120% of the AMI
- Above Moderate Income - greater than 120% of the AMI

Collectively, extremely low-, very low-, and low-income households are referred to as lower-income households (up to 80 percent AMI). According to SCAG's data for Household Income Distribution Based on County Annual Median Income, 42 percent of the City's households are lower-income households, 15.5 percent are moderate-income households and 42.5 percent are above moderate-income households.

**Table 12, Maximum Affordable Price and Rent**, shows maximum affordable rent and purchase price. Maximum affordable purchase prices by income category for two- and four-person households were calculated based on 2020 state income limits. The figures shown in **Table 12** are meant as a guideline to compare to the current market. Based on the 2020 median sales price of single-family residences and condos, a household would have to have an annual income of roughly \$72,000 to afford to purchase a home in the City. Meaning that only two-person, above moderate-income families and four-person, moderate- and above moderate-income families could afford a home in the City based off the estimated maximum affordable purchase price in the table below.

Table 12. Maximum Affordable Price and Rent			
Household Income Category	Annual Income	Maximum Affordable Rent	Maximum Affordable Purchase Price
2-Person			
Extremely Low	\$18,100	\$453	\$66,739
Very Low	\$30,150	\$754	\$145,806
Low	\$48,200	\$1,205	\$264,242
Median	\$60,250	\$1,506	\$343,307
Above Moderate	\$72,300	\$1,808	\$418,374
4-Person			
Extremely Low	\$26,200	\$655	\$98,704
Very Low	\$37,650	\$941	\$139,057
Low	\$60,250	\$1,506	\$329,716
Median	\$75,300	\$1,883	\$432,058
Above Moderate	\$90,350	\$2,259	\$520,809

Source: 2020 HCD State Income Limits, Guidestone.org Mortgage Calculator  
 Note: Annual income limits based on California State income limits for 2020; acceptable expenditure for rental housing calculated as 30 percent of income divided by 12 months assumes set-asides for utilities; acceptable expenditure for ownership housing was calculated as 30 percent of income and includes 10 percent down payment provided by the owner and assumes set-asides for utilities, real estate taxes, and homeowners insurance. Various local, state, and federal housing programs may require different calculations of maximum affordable rent or purchase prices.

### 3.4.3 COVID-19 Impact on Home Prices

Due to the seriousness of the public-health crisis resulting from COVID-19, there is a lot of economic uncertainty. Southern California, challenged by a pandemic, bought the fewest homes in any June on record, while record-low mortgage rates helped push the median selling price to an all-time high.

Based on the CoreLogic Home Price Insights report, annual home price growth accelerated to its fastest rate in nearly two years in July 2020 in response to strong purchase demand and sudden wave of relocations made possible by remote work, and historically low mortgage rates falling below 3 percent.

However, the number of sellers remained low in the summer of 2020, while the pool of prospective buyers expanded. Without homes for sale, the uneven buyer-seller dynamic led to an extremely competitive and challenging market for homebuyers.

The research team at Realtor.com listed Riverside-San Bernardino County as one of the five counties with the greatest recovery based on the Housing Market Recovery Index. The index uses the January 2020, pre-COVID-19 pace as a baseline. The Inland Empire (Riverside and San Bernardino counties) housing market could see a rise in demand and home sales going into 2021, as buyers relocate in from the more crowded and pricier coastal markets. However, whether the volume of new listings continues to improve remains to be seen, as sellers face political, economic, and health-related uncertainties heading into 2021.

On a nationwide level, the national Housing Price Index Forecast shows annual home price growth slowing through the middle of 2021, reflecting the anticipated elevated unemployment rates. This could lead to an increase of distressed-sale inventory as continued financial pressures leave some homeowners unable to make mortgage payments, especially as forbearance periods come to a close.

### 3.4.4 Rental Prices

According to Census data estimates, the nation's renter population has surpassed 100 million, and is the largest it's been since 1960. On a national level, renting has become exceedingly popular in the last decade. Since 2010, the number of renters increased two times faster (+9.1 percent) than the number of homeowners (+4.3 percent), signaling that many Americans, from young families to seniors, have been forced to shift away from homeownership, potentially minimizing housing stability and the ability to build equity.

Rental housing serves many needs, such as young adults not ready for the cost or responsibilities of homeownership, seniors seeking less costly and lower maintenance dwellings, families who benefit from the lower cost of rental housing and on-site amenities, and very low-income families who are often on fixed incomes. Overall, the rental market provides affordable housing opportunities to a great range of household sizes and incomes.

According to RentCafe rental marketplace, the average rent for an apartment in the City was \$1,317 as of February 2020, a 9 percent increase compared to the previous year, when the average rent was \$1,208. **Table 13, Highland Rent**, shows Census estimates for median gross rent by bedroom.

According to the data presented in **Table 13**, only housing units consisting of only one room and no bedroom, such as a one-room efficiency apartment, would be affordable to extremely low-income, two- or four-person households. One-bedroom housing units would be affordable to very low-income two-person households that are able to expend slightly more than 30 percent of their income on housing.

To avoid overcrowding, a four-person household would need a unit with at least two bedrooms. Based off Census estimates in **Table 13**, units with more than one bedroom would be unaffordable to extremely low- and very low-income, four-person households. These estimates show that the rental housing stock in the City is generally only affordable to moderate- and above moderate-income households, and some low-income households.

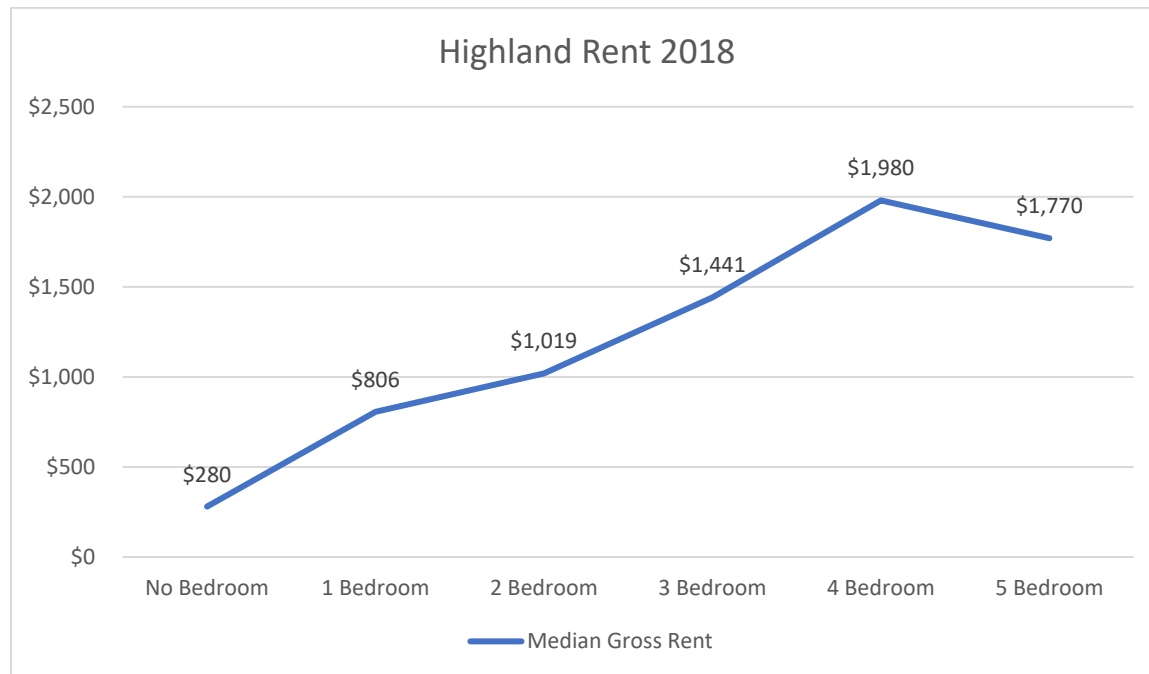


Figure 2. Highland Rent 2018

Table 13. Highland Rent 2018	
Unit Size	Median Gross Rent <sup>1</sup>
No Bedroom	\$280
1 Bedroom	\$806
2 Bedroom	\$1,019
3 Bedroom	\$1,441
4 Bedroom	\$1,980
5 Bedroom	\$1,770
Average	\$1,093

Source: Census B25031  
<sup>1</sup> 2018 rents are expressed in 2020 Inflation-Adjusted Dollars.

### 3.5 Overcrowding

A household is considered overcrowded if there is more than one person per one room in the housing unit and serves as a useful tool for identifying a lack of supply in affordable housing in an area. In this definition "rooms" include living rooms, dining rooms, and bedrooms. While some families with low incomes may opt for overcrowding to reduce spending, many lower-income residents often have no choice but to live in overcrowded housing. These overcrowded housing units place a strain on physical facilities and does not provide a satisfying living environment.



According to the American Community Survey, there are approximately 1,455 overcrowded units in the City, representing 9.1 percent of all households, with 2.7 percent of all households having more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding. In the City, overcrowding is more prevalent in renter households; 17.9 percent of renter households compared to 4.4 percent of owner households meet the definition of overcrowded. The existing rental housing stock may not meet the unit size and affordability needs of a portion of the City's lower-income households.

### 3.6 Cost Burden

An important factor in determining existing housing need is the affordability of housing. One measure of housing affordability is the percentage of a household's gross income needed to meet monthly mortgage payments. According to HCD and the United States Department of Housing and Urban Development (HUD), housing costs should not exceed 30 percent of a household's gross income.

Households spending more than 30 percent of gross income for housing are considered housing cost burdened, thus limiting their ability to afford other important expenses. This may cause a series of related financial problems, which may result in a deterioration of housing stock because costs associated with maintenance must be sacrificed for more immediate expenses such as food, clothing, health care, and utilities. It may also result in the selection of inappropriately sized units that do not suit the space or amenity needs of the household.

According to the Census Bureau data used by HUD in the Comprehensive Housing Affordability Strategy (CHAS) data, 57.8 percent of renter households and 29 percent of owner households spend 30 percent or more of gross income on housing. Of these households that are cost burdened, 58.6 percent of renters (34 percent of all renter households) and 37 percent of homeowners experience 'severe cost burden,' spending 50 percent or more of their income on housing. Ownership households generally have higher incomes and equity for loans that enable them to expend less of their annual income on housing.

### 3.7 Special Needs Groups

Individuals and families in certain subpopulations face significant challenges to finding decent, affordable housing. Finding units of adequate size, location, and design can be especially difficult for subpopulations with any special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. Therefore, in accordance with state law, California Government Code Section 65583(a)(7), this section will provide an analysis of the special housing needs of these groups.

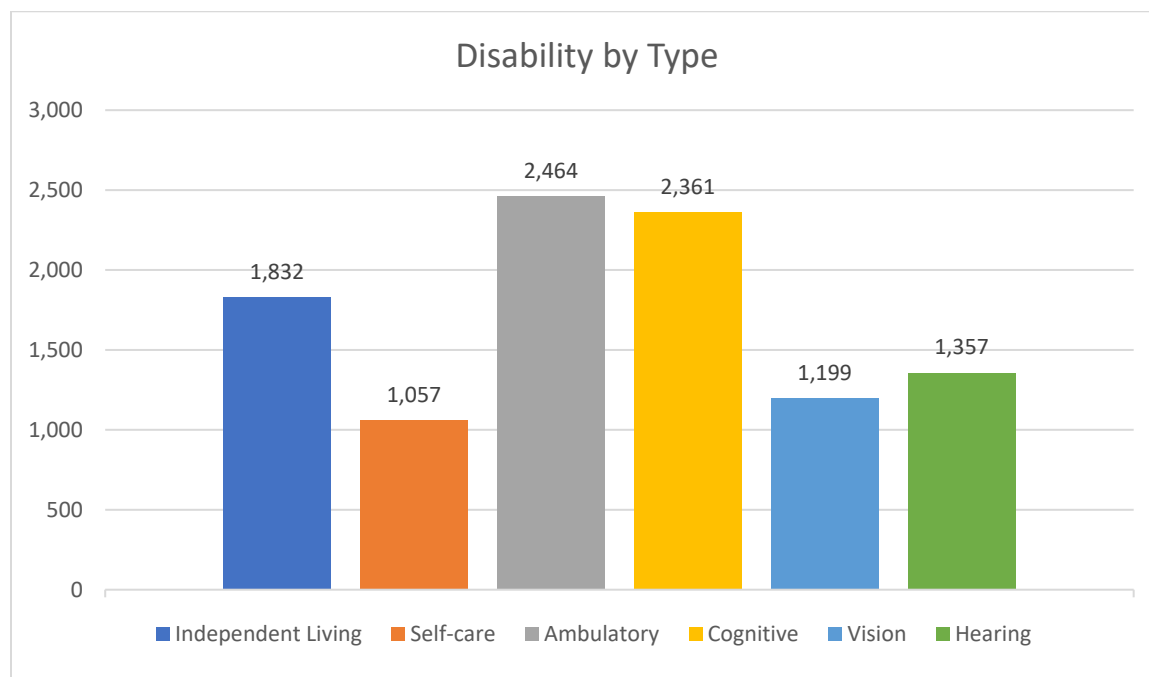
#### 3.7.1 Persons with Disabilities

Disabled persons often have special housing needs with regard to accessibility, location, and transportation. Disabled persons often face employment hardships, and many may rely on fixed incomes, therefore reducing their ability to afford adequate housing. The breadth and variety of disabilities presents a range of challenges for meeting the needs of disabled persons, including persons with developmental disabilities. Mountain Breeze Villas in the City provides a number of units as a project-based apartment for adults and senior citizens who are homeless or at risk of being homeless and receive clinical services from a Department of Behavioral Health clinic.

According to the 2018 Census, approximately 9.7 percent of City residents had a disability. The Census estimates report on six disability types, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty as described below:

- Hearing difficulty: deaf or having serious difficulty hearing (DEAR).
- Vision difficulty: blind or having serious difficulty seeing, even when wearing glasses (DEYE).
- Cognitive difficulty: because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM).
- Ambulatory difficulty: having serious difficulty walking or climbing stairs (DPHY).
- Self-care difficulty: having difficulty bathing or dressing (DDRS).
- Independent living difficulty: because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping (DOUT).

The 2018 Census identified 5,299 individuals in the City with one or more disabilities. Persons with an ambulatory and/or cognitive difficulties represent the largest share of disabled people in the City, as shown in **Figure 3, Disability Type**.



**Figure 3. Disability by Type**

Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs, as show in **Table 14, Disability by Employment Status**. In the City, 36.2 percent of the population with a disability is employed, compared to 68.9 percent of the non-disabled population.

Table 14. Disability by Employment Status				
	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	1,063	36%	21,073	69%
Unemployed	139	5%	2,369	8%
Not in Labor Force	1,736	59%	7,121	23%
<b>Total</b>	<b>2,938</b>		<b>30,563</b>	

Source: SCAG Local Housing Data; American Community Survey 2014-2018 5-year estimates.

### 3.7.2 Persons with Developmental Disabilities

There are also disabilities that are not tracked by the Census. For example, the Census does not record persons or households affected by developmental disabilities, including autism spectrum disorder (ASD). Senate Bill (SB) 812 requires the County to include the needs of individuals with a developmental disability within the community in the special housing needs analysis. According to Welfare and Institutions Code Section 4512, a “developmental disability” means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. According to SCAG’s 2020 Local Housing Data, 628 of the City’s residents between 0-17 years and 296 residents 18 years and older have a developmental disability.

The Centers for Disease Control and Prevention’s Autism and Developmental Disabilities Monitoring (ADDM) Network estimates that about 1 in 54 children have been identified with ASD. The City’s population under 18 years of age estimate for 2018 is 16,142, indicating that there could be approximately 300 children with ASD in in the City.

Some residents with developmental disabilities may live comfortably without special accommodations, but others require a supervised living situation such as group housing or an assisted living facility. City residents with developmental disabilities can seek assistance from the Autism Society Inland Empire in Corona or at the Inland Regional Center in San Bernardino, the largest regional developmental disability support center in the State of California. Some people with disabilities may require modifications that allow freedom of movement to/from and within a housing unit. **Table 15, Development Disability By Type of Residence**, provides information about the City’s developmentally disabled persons’ place of residence.

Table 15. Developmental Disabilities by Type of Residence	
Residence	With Disability
Home of Parent/Family/Guardian	501
Independent/Supported Living	26
Community Care Facility	37
Intermediate Care Facility	49
Foster/Family Home	10
Other	5

Source: SCAG Local Housing Data; CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019.

The Federal Fair Housing Act of 1998 and the American Disabilities Act (ADA) are federal laws that are intended to assist in the provision of safe and accessible housing. These regulations were codified in Title 24, Part 2, known as the California Building Code and apply to newly constructed multi-family dwelling units in building with three or more units or in condominium projects with four or more units. California Code of Regulations Title 24 sets forth accessibility and adaptability requirements for public buildings.

However, as these standards are not mandatory for single-family homes, in-home accessibility can be an issue for people with disabilities.

It is the policy of the City, pursuant to the Federal Fair Housing Amendments Act of 1988, to provide people with disabilities reasonable accommodation in rules, policies, practices, and procedures that may be necessary to ensure equal access to housing. The City has adopted specific procedures in the Zoning Code for processing reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts) in the application of zoning laws and other land use regulations, policies, and procedures. In order to make specific housing available to persons with disabilities, a request for reasonable accommodation may be made by any person with a disability, their representative or any entity, when the application of a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities. A request for reasonable accommodation may include a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice.

### 3.7.3 Elderly Persons

Elderly persons often seek housing based on affordability, proximity to services, proximity to public transportation, and accessibility. Senior households may reside on fixed incomes, resulting in limited housing opportunities and sensitivity to market increases in housing costs. According to Census estimates, of the City's renter households, 568 are 65 years and over (10.2 percent of all renters). An estimated 2,239 senior households owned their homes (21.6 percent of all owners).

Disabilities also create special housing needs for the elderly. On-average, the social security disability benefits is lower than social security benefits, which means a lower fixed monthly income. Limited mobility or sensory abilities make accessible, barrier-free housing and proximity to public transportation a priority for some senior households. According to the 2018 Census, 35.3 percent of all City residents aged 65 years and over suffer from one or more disability. Ambulatory difficulties (21.5 percent of City seniors) and independent living difficulties (16 percent of City seniors) are particularly prevalent in the City, making senior care housing an important need. Moreover, elderly residents seeking to remain independent benefit from programs that help them rehabilitate and improve their home. The reasonable accommodation ordinance in the City's Zoning Code provides disabled seniors a clear process for removing impediments to fully accessible housing.

Jeffrey Court provides 60 very low-income and 124 low-income apartments to seniors. For seniors requiring assisted care, the City has five residential care facilities for the elderly serving 139 residents and 10 adult residential care facilities with the capacity to serve 52 residents. The Highland Senior Center and Highland District Council on Aging, Inc. provides seniors with social events, planned trips, enrichment classes, transportation assistance, and a visitors and phone pal program for homebound seniors.

### 3.7.4 Large and Single-Parent Families

Increasing living costs have placed an additional hardship on lower- and moderate-income large families, defined as five or more members. Large families are considered a special needs group due to the limited supply of housing adequately sized to accommodate a large family without overcrowding. Single-parent households also face additional challenges. Typically, single-parent households have lower incomes than two-parent households since the household may only rely on one income and must also be able to afford

housing and childcare. Based on income statistics, female-headed households and female single-parents are considered to have a special housing need due to relatively low incomes.

According to Census estimates, there were 12,720 families in the City with an average family size of 3.9 in 2010. Of those families, 3,548, or 27.9 percent, had five or more people. In 2018, there were 15,932 households with a slightly smaller average size of 3.4. As shown in **Figure 4, Households by Household Size**, of those households, 3,561 had five or more people, representing 22.4 percent of all households.

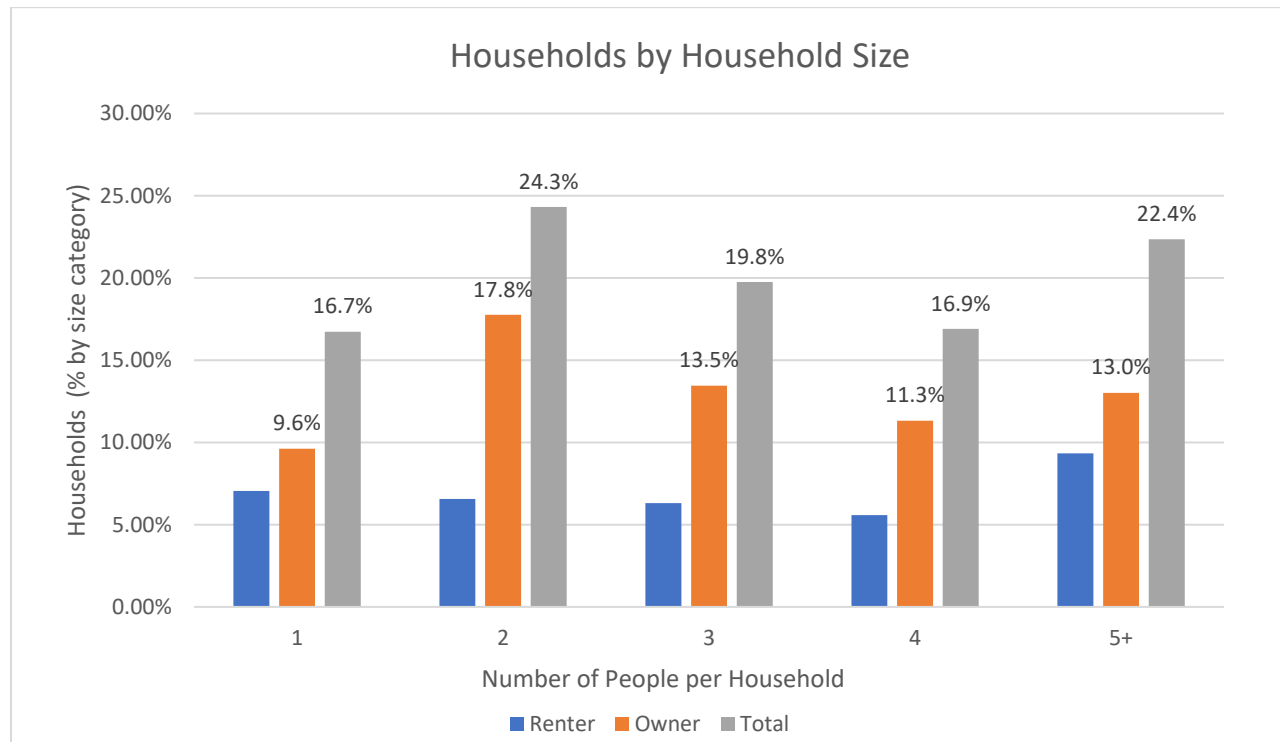


Figure 4. Households by Household Size

### 3.7.5 Female Headed Households

Statute requires analysis of specialized housing needs, including female-headed households in an effort to ensure adequate childcare or job training services. Based on 2018 Census estimates, there were 2,690 female-headed households in the City, 16.9 percent of the City’s total households. Of the total-female headed households, 46.6 percent of the female-headed households were owners and 53.4 percent were renters.

Of the City’s 15,932 total households, 10.1 percent are female-headed households with children under the age of 18, and 1.3 percent are female-headed with children under 6. In 2018, the number of both male and female-headed single-parent households with children under the age of 18 was 2,246, representing 14.1 percent of the City’s households. Single-parent household incomes tend to be lower than their two-parent counterparts, potentially because the parent may have to take part time employment due to childcare needs.

Single-family detached rentals and multifamily housing with child-oriented amenities, such as playgrounds and onsite childcare, would help meet the housing needs of the City’s large family and single-parent

households. Affordable attached housing, such as condominiums, can also help meet the needs of female-headed and single-parent households in the City.

### 3.7.6 Farm Workers

The economy in Highland was once driven by the citrus industry. As orchards turned into neighborhoods the number of farm workers employed in the City decreased. According to the Bureau of Labor Statistics, in 2017 approximately 152 City residents reported employment in agricultural, forestry, fishing, or hunting industries in other cities, and none reported having agricultural or related employment located in the City.

According to SGAG local housing data, there were 82 farmworkers by occupation (41 Full-time, year-round jobs) and 117 residents (76 full-time, year-round jobs) who were employed in the Agricultural Industry in City in 2018. Farm workers have special housing needs because they generally move based on seasons, earn lower incomes, and are known to live in overcrowded households in order to afford housing. In agriculture-dependent areas, affordable seasonal or permanent housing is an important component of the special needs housing stock. With less than 1 percent of the job market held by residents, the need for designated farmworker housing is minimal in the City; however, farmworkers are essential to the region's economy and food supply.

### 3.7.7 Extremely Low-Income Households

Extremely low-income (ELI) households earn annual incomes that are 30 percent or less of the area median income. Based on state income limits for 2020, a four-person, ELI household earns no more than \$26,200 and can afford \$655 per month for rent (expending 30 percent of annual income on housing). These households are generally living paycheck-to-paycheck and could be at risk of homelessness in the event of unemployment or a large expense such as medical treatment.

Households with extremely low incomes often experience severe overpayment and overcrowding. Although median gross rent is relatively more affordable in in the City (\$1,059) compared to median gross rent in San Bernardino County (\$1,275) according to the 2018 Census estimates, ELI households typically spend more than 30 percent of their income on housing.

Utilizing American Community Survey 2016 data, the U.S. Department of Housing and Urban Development CHAS estimates that there were 2,189 ELI households in the City (14.2 percent of all households). Of those households, 71 percent were renters. Housing the extremely low-income population can be especially challenging. Small, ELI households can often be accommodated through second units and single-room occupancy (SRO) units; however, large ELI households may face greater difficulty in finding affordable housing. Subsidized housing appropriate for ELI families can be provided in many forms including affordable rental multifamily units, townhomes, or condominiums. Higher density multifamily projects may serve as a future resource for the City's extremely low-income population.

**Table 16, Extremely Low-Income Housing Needs**, provides a breakdown of extremely low-income households by race and ethnicity. The race/ethnicity with the highest share of extremely low-income households in the City is the Black, non-Hispanic population (20.7 percent compared to 14.2 percent of total population), followed closely by the Hispanic race/ethnicity population with the second highest share.

Table 16. Extremely Low-Income Housing Needs			
	Total Households	Households below 30% HAMFI <sup>1</sup>	Share below 30% HAMFI <sup>1</sup>
White, non-Hispanic	6,155	475	7.7%
Black, non-Hispanic	1,421	294	20.7%
Asian and other, non-Hispanic	1,627	210	12.9%
Hispanic	6,265	1,210	19.3%
<b>Total</b>	<b>15,468</b>	<b>2,189</b>	<b>14.2%</b>
Renter-Occupied	5,575	1,560	28.0%
Owner-Occupied	9,910	635	6.4%
<b>Total</b>	<b>15,485</b>	<b>2,195</b>	<b>14.2%</b>

Source: SCAG Local Housing Data, 2020; HUD CHAS, 2012-2016.  
<sup>1</sup> HAMFI refers to Housing Urban Development Area Median Family Income.

### 3.7.8 Homeless Persons

The homeless are the community’s most vulnerable residents. The homeless often face chemical dependency, mental health problems, domestic violence, and other life-threatening conditions. Individuals and families experience homelessness for a variety of reasons, and therefore a homeless population may have a variety of needs. A homeless person may need medical care, childcare assistance, credit counseling, substance abuse treatment, job training, and/or English language education, among other services.

The San Bernardino County 2020 Homeless Count and Subpopulation Survey includes a point-in-time homeless persons count and an evaluation of the homeless population and their needs through homeless peer interviews. Based off the results, there were a total of 78 unsheltered adults in the City. This represents approximately 2.5 percent of the county’s homeless population. Of the 78 persons counted, volunteers were able to administer 50 surveys. The point-in-time survey reported that 35 of the surveyed adults were male and 15 were female. The majority of the unsheltered adults were between the ages of 25-39 (40 percent), followed by those between the ages of 55-61 (20 percent) and 40-49 (15 percent).

Due to a limited rental market with few affordable vacancies and income restrictions, extremely low-income families and individuals are potentially at risk of homelessness. There are a variety of emergency and transitional housing service providers in the City area to address a range of needs (see **Table 17, Local Resources for Homeless and At-Risk of Homeless Persons**). Facilities in the City provide air-conditioned rest areas in dangerously hot weather, emergency food provisions, employment assistance, marriage counseling, psychiatric evaluation and counseling, and transitional housing. City records identified two transitional housing facilities in the City. One of the facilities, located on Elmwood Road, is a 6-bed facility for ages 18-26. The other facility, located on Newcomb Street, is a 6-bed transitional home for homeless. Other nearby communities offer additional resources for the homeless and transitional housing facilities.

**Table 17. Local Resources for Homeless and At-Risk of Homeless Persons**

Name	Location	Services	Target Population
Patton State Hospital Senior Center	Highland	Air-conditioned facilities during dangerously hot Weather	All
Saint Adelaide Catholic Church	Highland	Emergency food, employment and marriage counseling	All
Vista Guidance Centers of Highland	Highland	Psychiatric evaluation and counseling and referral services	All
Family Services Association	Redlands	Motel vouchers, emergency food, clothing, counseling, rental assistance, housing advocacy, basic life skills training, and case management	All
Church on the Hill	Redlands	Emergency food	All
Knotts Family Agency	Redlands	Transitional housing	Youth
Salvation Army	Redlands	Emergency food, counseling, and utility assistance	All
Catholic Charities	San Bernardino	Casework, counseling, motel vouchers, emergency food, and utility assistance	All
Central City Lutheran Mission	San Bernardino	Casework, transitional and emergency housing, home repairs, motel vouchers, food, clothing, healthcare, counseling, utility assistance, showers and laundry, workforce development, men's homeless shelter, youth programs	Varies per program
Children's Fund	San Bernardino	Emergency food, shelter, transportation, medical and dental care, education, clothing, beds, school supplies, hygiene products, and furniture	Youth
Community Action Partnership of San Bernardino County Energy Conservation Program	San Bernardino	No-cost home weatherization services and utility assistance	All
Community Action Partnership of San Bernardino County Family Development Program	San Bernardino	Motel vouchers, rental assistance, food, miscellaneous family self-sufficiency supportive services	Families
Community Action Partnership of San Bernardino County Food Bank	San Bernardino	Emergency food	All
Cornerstone Compassion Center	San Bernardino	Emergency food and clothing, health clinic	All
Department of Behavioral Health Homeless Program	San Bernardino	Supportive permanent housing and counseling services	Mentally ill persons
Frazer Community Center	San Bernardino	Emergency and transitional supportive services and assistance.	All
Hase and Associates Systems, Inc.	San Bernardino	Prevention education, Hispanic outreach program, outpatient substance abuse treatment, employment assistance, and DUI program	All
Hernandez Community Center	San Bernardino	Food distribution and youth activities	All
Inland AIDS Project	San Bernardino	Emergency, transitional, and permanent housing, emergency rent and utility assistance, and residential care for chronically ill	Persons with HIV/AIDS
Inland Behavioral and Health Services	San Bernardino	Case management and various emergency services	All
Mary's Mercy Center	San Bernardino	Emergency food, clothing, and showers	All



**(Continued) Table 17. Local Resources for Homeless and At-Risk of Homeless Persons**

Name	Location	Services	Target Population
New House Women with Children	San Bernardino	Substance abuse rehabilitation	Women with Children
New House, Inc.	San Bernardino	Substance abuse rehabilitation (39 beds)	Individuals
Operation Grace	San Bernardino	Emergency and transitional shelter	Female individuals
Our Lady of Fatima	San Bernardino	Emergency food	All
Our Lady of Hope	San Bernardino	Emergency food and clothing	All
Priscilla's Helping Hand	San Bernardino	Case management and housing, education, and employment assistance	Emancipated foster youths
Rolling Start, Inc.	San Bernardino	Advocacy, housing and personal assistance referrals, and independent living skills training	Disabled persons
Salvation Army	San Bernardino	Emergency shelter (70 beds)	All
Salvation Army ARC	San Bernardino	Alcohol abuse treatment program (65 beds), transitional housing	Individual males
San Bernardino City Mission	San Bernardino	Emergency food, clothing, and hygiene items	All
San Bernardino County Department of Veterans Affairs	San Bernardino	Assistance with benefits and pension claims	Veterans and dependents
San Bernardino Sexual Assault Services	San Bernardino	Counseling, hospital, and court accompaniment	Victims of sexual assault
Set Free Christian Fellowship	San Bernardino	Substance abuse transitional living (35 beds)	Individuals
Veterans Alcoholic Rehab Program (VARP) Harris House	San Bernardino	Substance abuse rehabilitation and transitional housing	Veterans
VARP Gibson House for Men	San Bernardino	Substance abuse rehabilitation and transitional housing	Male veterans
VARP Gibson House for Women	San Bernardino	Substance abuse rehabilitation and transitional housing	Female veterans
Veronica's Home of Mercy	San Bernardino	Christian transitional housing (14 beds)	Youth and Pregnant Women
San Bernardino Vet Center	San Bernardino	Individual and group counseling	Veterans
Victory Outreach	San Bernardino	Substance abuse rehabilitation (10 beds)	All
Vista Guidance Center	San Bernardino	Drop-in center with clothing and laundry facilities	All

Source: Community Action Partnership of San Bernardino County 2020.

### 3.8 Affordable Housing

At-risk affordable projects are those that could convert to market rents within 10 years from the planning period. State law requires that the City identify, analyze, and propose programs to preserve existing multi-family rental units which are eligible to convert to non-low-income housing uses due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions during the next ten years.

#### 3.8.1 Assisted Housing Developments at Risk

Government Code Section 65583(a)(8) requires an analysis of existing assisted multi-family housing developments for low-income renters that are eligible to change to market-rate units during the next ten-year period due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. The analysis must inventory each development by project name and address, the type of government assistance received, the earliest possible date of change from low-income use, and the total number of senior and non-senior units that could be lost from the local low-income housing stock. In

addition, the analysis is required to assess the conversion risk and displacement of low-income tenants, estimate and analyze the costs of replacement versus preservation of at-risk units, identify entities qualified to preserve at-risk units, and identify financing and subsidy resources.

After extensive research of all assisted units in the county, it was determined that all the affordable developments in the City are not currently at-risk of conversion with a “Low-Risk” designation, as shown in **Table 18, Assisted Units At Risk of Conversion**.

Table 18. Assisted Units At Risk of Conversion					
Name and Address	Housing Type	Affordable Units	Total Units	Program	Risk Level
Jeffrey Court Seniors (7367 Central Avenue)	Senior (Age 55+)	184	185	LIHTC	Low
Mountain Breeze Villas (25942 E Baseline Street)	Non-Targeted	167	168	LIHTC; HUD; CalHFA	Low
Sterling Village (7360 Sterling Avenue)	Large-Family	79	80	LIHTC	Low
<b>Source:</b> California Housing Partnership Corporation (CHPC), 2020, Office of the State Treasurer All Active TCAC Projects, 2019, HUD Office of Policy Development and Research (PD&R), 2019					

Affordable units may convert to market rate prices due to prepayment of HUD mortgages, opt-outs, and expiration of Section 8 contracts, and expiration dates established by other funding sources. According to City records, no projects are at risk of converting to market rate during the planning period.

The County of San Bernardino currently owns and operates 12 public housing units in the City. There is no expiration date for the affordability of these units. The County Housing Authority also issues approximately 394 Housing Choice Vouchers in the City. Program participants may use their vouchers throughout San Bernardino County. There are no project-based Section 8 buildings in the City.

While Jeffrey Court Seniors is identified as low-risk, the development is eligible to opt-out of affordability control since it was placed in service in 1999. The City will continue to monitor the development through subsequent Housing Element updates. In the event of affordability expiration, the City may pursue subsidizing the units, purchasing, and placing a long-term affordability covenant on the units, or constructing replacement units. If the property owner does not extend the affordability covenant, the City will reach out to numerous qualified entities determined by HCD as having the ability to purchase and manage the property for continuous affordable housing.

### 3.8.2 Costs Analysis

To maintain the existing affordable housing stock, the City works to preserve the existing affordable units. The financial cost of preserving rental units compared to allowing them to be converted to market-rate depends on the rent for the apartment and the income level of the tenant. Typically, the amount of subsidy needed is the difference between what a household can afford to pay (no more than 30 percent of annual income) and the fair market rent for the unit. As of January 2021, the average rent for a one-bedroom unit in Highland was \$1,364. Given the County’s 2020 State Income Limit was \$48,200 for a low-income, two-person household, two-person household renters earning 80 percent of the median family income for the area would pay approximately thirty four percent of earnings on rent. A subsidy of

approximately \$159 per month (\$1,908 per year) would be required to meet the 30 percent limit. This number would reflect a lower-income level and would be higher for very low-income and extremely low-income households. Such trends in rental housing prices in the City indicate that market rental units will not be affordable to lower-income households throughout the planning period. Further, if the units were improved and rents were significantly increased, a financial resource would be necessary to pay the difference between the higher rents and the market rents to maintain affordability.

Another option is new construction. The final cost of constructing deed-restricted affordable housing units depends on whether the developer needs to purchase land or whether the City can transfer the land at a subsidized price, and how well the private developer's initial financial contribution can be leveraged with other funding sources. As no units have been identified as at-risk during the planning period, there is no further analysis regarding preservation and construction costs.

### 3.8.3 Preservation Resources

The City is committed to working with affordable housing property owners for solutions to prevent the expiration of affordability covenants. The City will develop relationships with property owners of existing affordable housing and with local affordable housing entities in an effort to attract interest and resources for preserving and constructing affordable housing units. Qualified entities are housing nonprofits that have been approved by the Community Development and Housing Department. To qualify, an entity must be able to manage the project, maintain affordability for at least 30 years or the remaining term of assistance, preserve the existing occupancy profile, maintain rents at a predetermined level of affordability, and agree to renew subsidies if available. Here are some local housing developers and managers that the City may contact:

- BRIDGE Housing Corporation,
- California Housing Partnership Cooperation,
- Jamboree Housing Corporation,
- LINC Housing,
- Mercy Housing,
- Neighborhood Housing Services of the Inland Empire, and
- National Core

There are a number of programs to assist the City and County of San Bernardino in increasing and improving their affordable housing stock. The following paragraphs discuss available programs that provide financial resources for affordable housing units.

The City is a member of the San Bernardino County Urban County Consortium and participates in countywide efforts to receive federal housing and community development funds. These funds are potential resources for affordable housing construction, rehabilitation, and preservation. The San Bernardino County Consolidated Plan is an assessment of existing affordable housing and community development needs that informs the U.S. Department of Housing and Urban Development, as part of a federal fund awarding process granted to participating jurisdictions like the City, to create and rehabilitate affordable housing for lower income households. The assessment evaluates investments from the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solution Grant (ESG) programs. The CDBG program was designed to improve low- and moderate-income communities through funding capital improvement and public services projects. The HOME funds are the

primary funding available for the development of affordable housing. HOME funds are administered by the County through a Notice of Funding Availability (NOFA). The ESG programs assist individuals and families experiencing a housing crisis or homelessness to regain stability in permanent housing through No Place Like Home (NPLH) and California Emergency Solutions and Housing (CESH) funding, and housing and legal assistance through the Housing and Disability Advocacy Program (HDAP).

LIHTC is the most significant financial resource to preserve and create new affordable housing by issuing tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The California Tax Credit Allocation Committee oversees the application and allocation process for all LIHTC project. Applicants compete for the funds, which are prioritized based on location, affordability terms, housing needs, and project amenities.

A shorter-term solution to affordable housing stock limitation is the County's Housing Choice Voucher program, which provides rent subsidies to extremely low- and very low-income households with a housing cost burden, or who are at risk of becoming homeless or being displaced. Voucher recipients rent housing from private landlords and pay a portion of their income toward rent (usually up to 30 percent of their income). The County Housing Authority subsidizes the difference in monthly payments to the owner. The waiting list for this program is often closed and only opens every several years because the federal government only provides funding to serve a certain number of households. New households are assisted as households currently in the program move off the program. Serving families through attrition causes long wait times even if a family may be eligible.

# Appendix C: Constraints and Zoning Analysis

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# HOUSING CONSTRAINTS

Various factors influence the City's ability to meet its housing goals. These include governmental constraints, such as land use regulations, and nongovernmental constraints, such as market and environmental factors. This section provides the requisite analysis of potential and actual market, governmental, and environmental constraints to the production, maintenance, and improvement of housing pursuant to state law.

## 1 GOVERNMENTAL CONSTRAINTS

The General Plan Land Use Element sets forth land use designations to guide the location, type, and intensity or density of permitted uses of land. The Land Use and Development Code implements the General Plan by providing specific direction and development standards within each of the use categories. These land use controls can facilitate or limit certain types of development.

### 1.1 General Plan

State law requires that each city have a General Plan that establishes policy guidelines for future development. The City of Highland General Plan is a long-range policy document which lays out the framework for all future growth and development within the City. The City of Highland adopted a comprehensive update of the General Plan in 2006. The Land Use Element describes the land use policies and designations used to guide physical development of the City through the location, distribution, and density of uses. Predominately a residential community, almost 60 percent of the City's 11,948 acres of land is planned for residential development.

As shown in Table 1, the Land Use Element describes seven land uses allowing housing, including a historic preservation district and one mixed commercial, office, and residential land use designation. The Planned Development (PD) designation allows flexibility in development standards to encourage creativity and site-specific design. The PD district is an opportunity for master planning without a specific plan, potentially providing a cost savings to the developer, buyer, and renter.

<b>Table 1. Residential General Plan Land Uses</b>		
<b>Land Use Designation</b>	<b>Acres</b>	<b>Description</b>
Agricultural/Equestrian	504	Rural and equestrian-oriented residential development at a maximum density of 2 units per acre
Low Density	2,500	Single-family detached homes, including mobile homes, at a maximum density of 6 units per acre.
Medium Density	177	Small lot single-family detached or attached housing, mobile homes, and multifamily housing at a maximum density of 12 units per acre.
High Density	46	Multifamily housing at a maximum density of 18 units per acre.
High Density Special	58	Multifamily housing between 20 and 30 units per acre.
Historic Village Residential	32	Low density residential development within the Historic Village District at a maximum density of 6 units per acre.
Mixed Use	54	Horizontal and vertical mixed-use housing types at a maximum density of 18 units per acre.
Planned Development	3,708	Specific plan areas in which housing types and densities may vary, but typically range from 5 to 12 units per acre.
<b>Total</b>	<b>7,079</b>	

The program provided by the General Plan Land Use Element establishes 15 goals for future development within the City. These goals are intended to:

- Plan for future growth;
- Provide clarity in land use guidance;
- Maintain a mix of development with urban, suburban, and rural character;
- Create places for people to live, shop, work, learn, and recreate;
- Protect and enhance Highland’s neighborhoods;
- Provide new housing opportunities;
- Strengthen commercial opportunities;
- Expand the employment base;
- Ensure land use compatibility; and
- Preserve natural resources.

The land use controls provided in the General Plan and Land Use and Development Code guide the development of new housing to meet existing and future needs, maintain the existing character, and improve neighborhoods and the housing stock.



## 1.2 Land Use and Development Code

Zoning regulations are intended to ensure that development does not negatively affect community health, safety, and welfare. The City's Land Use and Development Code regulates housing opportunities by establishing permitted uses and development standards. Several zoning districts respond to specific existing conditions, such as compatibility with the historic development in the original Highland Townsite, and appropriate design for busy transportation corridors.

Residential uses allowed in Highland are listed by Zoning District in Table 2. Uses permitted by right are indicated by the "P," conditionally permitted are indicated by the "C," and permitted uses that may require approval by the Community Development Director or designee are indicated by "SR." All permit types are defined in the Permit Approval Process Section.

New residential zoning districts, the Residential High-Density District (R-4) and the Residential High-Density Special Overlay (HDS), were established in the City's Land Use Development Code in 2011. These districts allow densities between 20 and 30 units per acre to facilitate the development of higher density multifamily housing as part of a larger mixed-use community.

**Table 2. Residential Uses Permitted by Zoning District**

Use	Agricultural Equestrian (A/EQ)	Single-Family Residential (R-1)	Two-Family Residential (R-2)	Multifamily (R-3)	Multifamily (R-4)	Residential High Density Special (HDS)	Village Residential (VR)	Corridor Residential (R-2C)	Mixed Use		East Highland Village (EHV)
									Attached Mixed Use (MU)	Separated Multiple Use Project (MU)	
Single-Family Detached	P	P	SR	■	■	■	P	SR	■	SR	P
Single-Family Detached (2-4 units/parcel)	■	C	SR	SR	■	■	■	C	■	SR	■
Single-Family Detached (5+units/parcel)	■	■	C	C	SR	■	■	C	■	SR	■
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P	P
Single-Family Attached	■	■	C	SR	■	■	■	SR	C	SR	■
Multifamily Attached	■	■	C	C	SR	SR	■	C	C	SR	■
Mobile Home Subdivisions	SR	SR	C	C	■	■	■	■	■	■	■
Mobile Home parks	■	C	C	C	■	■	■	■	■	■	■
Boarding or rooming houses (7+ persons)	■	■	C	C	C	C	■	C	■	■	■
Manufactured Homes (mobile homes with permanent foundation)	SR	SR	SR	SR	■	■	■	■	■	■	■
Board and Care Facility (7+ persons)	■	■	C	C	C	C	■	C	■	■	■
Senior Independent Living	SR	SR	C	C	C	C	SR	C	C	C	SR

Senior Congregate Care/ Assisted Living	■	■	C	C	C	C	■	C	C	C	■
Convalescent Care	■	■	C	C	C	C	■	C	C	C	■
Supportive and Transitional Housing <sup>1</sup>	SR	SR	C	C	C	C	SR	C	■	■	SR

Legend:  
 ■ = Not permitted in this district.  
 P = Permitted subject to a consistency assessment.  
 SR = Permitted subject to approval of staff review permit application.  
 C = Permitted subject to approval of a conditional use permit application.

Source: City of Highland Land Use and Development Code, 2020.  
 1: Emergency shelters (excludes transitional housing and permanent support type housing facilities) are permitted in the Business Park (BP) District subject to approval of a department review permit application.  
 Note: Assisted living, live/work, multifamily dwellings, residential accessory structures, second units, senior housing, single-family dwellings, and townhomes are permitted by right in Planning Area 2 – Residential Villages and Planning Area 3 – Village Center of the draft Greenspot Village and Marketplace Specific Plan.

## 1.3 Permitting Process

Development review is the primary way to ensure that the construction of projects contributes in a positive manner to the community and quality of life. Residential development projects typically undergo several types of approvals. This section outlines the development review process for various types of housing (see table 6, Permit Processing Times, Permit Approval Process for average processing times for various project applications and reviews).

### 1.3.1 Single-Family

Single-family detached homes are the most common housing type in Highland, making up approximately three-quarters of the entire housing stock. Single-family detached housing is permitted by right in four zoning districts (A/EQ, R-1, VR and EHV), and permitted following Staff Review in two districts (R-2 and R-2C) and in separated multiple use projects in the MU District. Single-family attached housing, such as condominiums, is permitted in the R-2 with a Conditional Use Permit and permitted in the R-2C and R-3 zones with a Staff Review Permit. Large single-family detached and single-family attached projects that require tract maps are ultimately reviewed by the Planning Commission. In 2009, the City of Highland merged the former Design Review Board with the Planning Commission in order to reduce the amount of time spent on design issues and streamline the project approval process without diminishing quality. The Planning Commission now performs design review at the same time as other reviews that may be necessary depending on the permit at hand.

The City's Planning Division coordinates a pre-application meeting between a project's Applicant and the Project Review Committee to provide the Applicant an early opportunity to present their project to the City before submitting a development application(s). This initial step has proven to be successful in the past because it discloses infrastructure or other issues that are more cost-effective to address early in the project design phase. Identifying potential issues prior to submitting a development application saves developers a significant amount of time and money. After the Planning Division determines the applications to be complete, they are routed to the Project Review Committee for their formal review and comments. Applications are also routed to utility companies and outside responsible agencies that have requested to be notified.

Once the project's environmental review and public comment process have been completed, the Planning Division provides a copy of all the comments to the Applicant for review and discussion with the City's Project Review Committee. Once the comments have been reviewed by all parties, a public hearing before the City's Planning Commission is scheduled. The Applicant is provided with a copy of the public hearing notice and staff report with condition and findings of facts for their review. The conditions clearly outline all the requirements needed to record a final map, as well as any conditions related to the construction of the housing units which are necessary to ensure adequate public health, safety, and welfare.

### 1.3.2 Accessory Dwelling Units

Accessory dwelling units may be detached from or attached to the primary single-family dwelling unit. Accessory dwelling units are capable of providing housing below market prices and often meet the special needs of young persons, seniors, and disabled persons. In accordance with Assembly Bill 1866 (Government Code Section 65852.2), the City amended the Land Use and Development Code to make permitting accessory dwelling units in single-family zones a ministerial action; which does not require

public notice, public hearing, or discretionary approval. Understanding that accessory dwelling units provide opportunities for affordable housing without changing the City's small-town character; Highland facilitates the development of attached and detached accessory dwelling units by permitting them in all residential zones.

Since the City's amendment of the Land Use and Development Code, there have been several updates to the state law regarding accessory dwelling units, such as parking requirements, reduced setbacks, and impact fee restrictions. **Program 12, Accessory Dwelling Units**, will revise the City's ADU ordinance (section 16.44.180, Accessory dwelling units) to comply with recent changes in state laws.

Between 2015 to 2020, the City approved 8 accessory dwelling units. Additionally, one ADU permit was placed on holder and another ADU permit expired. Based on this record, the City assumes that 2 ADU's per year could be permitted during the planning period. As the City's senior and college-age population increases, as is projected for the planning period, accessory dwelling units could help to provide housing for these populations as they can be an important housing resource for small, lower-income households.

### 1.3.3 Multifamily Housing

Multifamily housing, referred to as multiple family, attached housing, makes up approximately 16 percent of the City's housing stock. Multifamily housing is currently conditionally permitted in the three multifamily zones, R-2, R-2C, R-3 and in attached mixed use structures in the MU district. Multifamily housing is permitted following Staff Review in separated multiple use projects in the MU district and permitted by-right in the R-4 zone and High Density Special Overlay (HDS) subject to the City's Staff Review Permit. The conditional use permit (CUP) process is the City's opportunity to ensure compatibility with surrounding uses. The CUP process can occur concurrently with a Design Review (see Section Permit Approval Process). Multifamily housing projects in the R-4 and HDS districts are not subject to a CUP; however, they do require Major Design Review. The design review process considers the compatibility with design standards, such as setbacks, landscaping, and other basic aspects of project design to ensure high quality design.

The permitting procedure for a multifamily housing project is similar to that for a large, single-family detached or attached project. In the case of a hypothetical 50-unit multifamily project, the City's Planning Division will coordinate a pre-application meeting between the Applicant and the Project Review Committee to identify potential issues that should be considered early in the planning and design process.

### 1.3.4 Mobile/Manufactured Housing

Single mobile home units placed on a permanent foundation, certified under the National Mobile Home Construction and Safety Standards Act of 1974 and constructed after October 1976, may be permitted on individual lots in the A/EQ, R-1, R-2 and R-3 zones, as specified in the City's Land Use and Development Code (section 16.40.180, Mobile home and modular home requirements), following Staff Review approved by the Community Development Director. The review ensures that the units comply with state and local standards of the underlying zoning district. Mobile home subdivisions are permitted under staff review in the A/EQ and R-1 zones and conditionally permitted in the R-2 and R-3 zones, while mobile home parks are conditionally permitted in the R-1, R-2 and R-3 zones.

Pursuant to California Government Code 65852.3 and 65852.7 certified mobile homes (manufactured homes) on a permanent foundation that are built to the United States Department of Housing and Urban Development (HUD) Code are considered the same as single-family dwellings and are permitted on all lots zoned for single-family homes. Such housing is subject to the same requirements (e.g., planning, permitting, reviews) as site-built homes, except for certain architectural requirements. Government Code specifies that a mobile home park shall be deemed a permitted land use on all land planned and zoned for residential land use as designated by the applicable general plan; provided, however, that a city may require a use permit. **Program 21, Mobile Home Preservation**, requires a report detailing relocation and displacement for any proposed conversion or closure of a mobile home park.

The Highland Land Use and Development Code defines manufactured housing as a structure, transportable in one or more sections, which is built on a permanent chassis and is designed for use with or without a permanent foundation when connected to the required utilities., including travel trailers for floodplain management purposes, and provides guidelines for single mobile homes and modular homes or manufactured dwelling units within the City’s Code, including design feature requirements consistent with California Government Code 65852.3. The permitted uses table for residential districts in the Land Use and Development Code includes mobile home subdivision and mobile home parks.

## 1.4 Special Needs Housing

### 1.4.1 Residential Care Facility

State law prevents cities from imposing overly restrictive regulations on community care facilities. The Health and Safety Code (§§ 1500 et seq.) requires that group homes serving six or fewer persons be (1) treated the same as any other residential use and shall be considered a residential use of property by a single family, (2) allowed in all residential zones, and (3) be subject to the same development standards, fees, taxes, and permit procedures as those imposed on the same type of housing in the same zone, and no conditional use permit, zoning variance, or other zoning clearance shall be required that is not required of a family dwelling of the same type in the same zone.

According to the City’s Land Use and Development Code, a residential care facility is a state-authorized, certified, or licensed facility that provides non-medical residential care, day treatment, therapeutic rehabilitative care, and adult day care, residential care for the elderly, transitional housing placement, substance abuse recovery or treatment facility, or foster family agency services for children or adults. According to the permitted uses table in the Land Use and Development Code, residential care facilities serving seven or more persons, called “Board and care facilities” in the uses table, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and commercial zones (CG, NC, PC, VC).

To comply with the intent of fair housing laws and ensure clarity in the permitting process, the Housing Element **Program 18, Residential Care Facilities**, will update the zoning code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. The program will create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving six or fewer persons in all residential zones in which single-family homes are permitted and conditionally permitted in zones where multi-family housing is permitted. This will ensure that licensed facilities (group homes/residential care facilities) are allowed in residential

zones consistent with state law for small group homes (six or fewer) and with a Use Permit for large facilities (seven or more).

#### 1.4.2 Boarding or Rooming Houses

Although a boarding or rooming house may provide housing to unrelated individuals, it is not considered a residential care facility. Highland's Land Use and Development Code defines a boarding or rooming house as a building containing a dwelling unit where lodging is provided with or without meals for compensation for seven or more persons. For six or fewer occupants, the City defers to requirements in the State's guidelines. A boarding or rooming house does not provide on- or off-site supportive services. Boarding or rooming houses are conditionally permitted in the R-2, R-2C, R-3, R-4 and HDS residential zones and may not be located within 500 feet of the same use. Furthermore, to prevent a concentration of parolees, no more than one federal, state or juvenile justice parolee shall be allowed to live in boarding or rooming house at any one time, except if a boarding or rooming house has 10 or more dwelling units, then there may be one additional federal, state or juvenile justice parolee for every 10 dwelling units. The location and parolee restrictions were enacted in response to public concerns about boarding and rooming housing affecting community safety and welfare.

#### 1.4.3 Senior Housing

With Highland's growing senior population, it is important that a range of housing types located in well-resourced areas (e.g., near transit, jobs, schools, parks, etc.) are available to serve their special needs. These can include housing such as smaller and more affordable units (including second dwelling units), senior housing, and various forms of care housing. Care housing that assists special needs seniors include senior independent living projects, residential care homes for the elderly, congregate care, and convalescent care. Senior independent living projects are permitted with a Staff Review Permit in the A/EQ, R-1, VR, and EHV zones, and conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and the mixed use zone (MU). Congregate care and convalescent care homes are conditionally permitted in multifamily, mixed use and commercial zones. Residential care facilities, which can include residential care facilities for the elderly per the City's definition, serving seven or more persons, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS).

#### 1.4.4 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing

California Senate Bill 2 (Cedillo) (SB 2) was approved in 2007 with the goal to remove zoning barriers for emergency shelters, and transitional and supportive housing and provides direction in the ways in which local governments address housing for the homeless or those at-risk of homelessness. SB 2 is intended to strengthen existing housing element requirements to provide for the development of emergency shelters and transitional and supportive housing.

Emergency shelters are the first step in a homeless continuum of care program designed to allow homeless people a temporary place of stay. As defined by subdivision (e) of Section 50801 of the Health and Safety Code, emergency shelter means housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person, and where no individual or household may be denied emergency shelter because of an inability to pay.

SB 2 requires jurisdictions to identify a zone where emergency shelters are a permitted use without a conditional use permit or other discretionary action. The identified zone(s) must have sufficient capacity to accommodate the needs, regardless of the demonstrated need, and have sufficient capacity to permit at least one year-round emergency shelter. Emergency shelters serving 25 persons or less are permitted in the business park (BP) employment zone subject to approval of a staff review permit application. There are approximately 270 acres designated BP (116 of which are vacant), generally located along the southwestern city boundary. The average lot size is approximately 20,500 square feet and could accommodate a multi-service facility. The BP designation allows for light industry, research and development, office uses, and business and commercial uses that support the employees and clients of the area and commercial uses requiring large parcels.

Should an emergency shelter be provided in the BP district, residents would benefit from access to public transit, retail uses, and regional employment growth in nearby businesses. Residents will also be connected to other areas of the community and adjacent cities by buses. The local bus transit service provider, Omnitrans, operates two routes that serve this area (Route 3 and Route 15).

As defined in California Government Code Section 65582(j), transitional housing includes buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance. Supportive housing is defined by California Government Code Section 56682(f) as housing with no limit on length of stay, that is occupied by the target population<sup>1</sup>, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Chapter 16.06, Definitions, of the City's Land Use and Development Code defines "supportive housing" and "transitional housing" per the definitions provided above.

Consistent with Government Code 65583, transitional housing and supportive housing shall be considered a residential use of property and shall be subject to the same development standards and permitting processes as the same type of housing in the same zone and in compliance with the occupancy limitations of Title 24 of the California Code of Regulations. Under California AB 2162, supportive housing meeting specific standards shall be a use by right in all zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within ½ mile of a public transit stop.

The City updated the Land Use and Development Code in 2013 to Comply with State law.; However, there have been several updates to State law as outlined above. As such, the Housing Element includes **Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing**, to permit transitional and supportive housing consistent with state laws, and to amend the City's Emergency Shelters ordinance (16.44.270 Emergency shelters) to comply with parking requirements set forth by AB 139, Quirk-Silva. **Program 28, Low Barrier Navigation Centers**, includes an update to the Land Use and

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<sup>1</sup> "Target population" means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.



Development Code to provide by-right, CEQA exempt approvals to Low Barrier Navigation Centers<sup>2</sup> meeting specific standards in areas zoned for mixed uses and nonresidential zones permitting multifamily, consistent with AB 101's requirements for Low Barrier Navigation Centers.

#### 1.4.5 Single Room Occupancy Units

Another potential source of housing for the homeless or formerly homeless are single room occupancy (SRO) units. SRO units are very small-attached units intended for no more than one or two people. An agency or organization generally oversees the project and provides ongoing supportive services to promote self-sufficiency.

### 1.5 Facilitating Affordable Housing

#### 1.5.1 Residential High Density Special (HDS) Overlay

The City established an HDS Overlay in 2011 on approximately 52 acres zoned as Planned Development (PD). The Overlay allows the permitting of up to 650 multifamily units at a minimum density of 20 units per acre and a maximum density of 30 units per acre. The Overlay area is generally bound by Greenspot Road on the south, Eucalyptus Avenue on the north, Boulder Avenue on the east, and the City Creek wash basin on the west. However, the 52 acres are now located entirely within the Greenspot Village & Marketplace Specific Plan adopted in 2013.

The Greenspot Village & Marketplace Specific Plan is a master-planned, mixed-use development located within the area identified in the City's General Plan Land Use Element as the "Golden Triangle Community Policy Area." The Specific Plan proposes three Planning Areas with two development scenarios, depending on whether the approximately 21-acre parcel currently owned by San Bernardino County Flood Control District property is included as part of the development. Planning Area 1 would consist of commercial uses, Planning Area 2 of residential uses, and Planning Area 3 would be a mix of residential, commercial, entertainment, governmental and professional office uses. Under both scenarios, the total number of dwelling units may not exceed 800; within that limit, dwelling units may be transferred between Planning Areas 2 and 3. Under Scenario 1, Planning Areas 2 and 3 would include density ranges of 20-30 du/ac and 18-40 du/acre, and a total of 550 units and 350 units, respectively. Under Scenario 2, Planning Areas 2 and 3 would include density ranges of 30 du/ac and 18-40 du/acre, and a total of 500-700 units and 100-300 units, respectively. As of March 2021, 7.5-acres of the San Bernardino County Flood Control Property are in the process for development and the remaining approximately 13 acres, of the property are under contract for development.

#### 1.5.2 Lot Consolidation Incentives

Lot consolidation can increase the efficiency of land use and create the critical mass needed for a quality multifamily housing project. The City has identified numerous vacant and underutilized parcels that have the potential to accommodate multifamily projects. Their development potential could be improved through lot consolidation.

Although the development community is aware of the inherent benefits of acquiring larger sites, the City seeks to promote this process. Through the implementation **Program 23, Lot Consolidation**

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<sup>2</sup> Low Barrier Navigation Center" is defined as a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.

**Incentive**, of the Housing Element, the City is committing to providing expedited processing for the consolidation of lots identified in **Appendix E: Sites Analysis and Inventory** as having the potential to accommodate lower income households.

### 1.5.3 Inclusionary Housing Ordinance

The City's Land Use and Development Code's Inclusionary Housing Ordinance's aims to facilitate the development and availability of housing affordable to a broad range of households with varying income levels within the city. It provides guidelines for the production of affordable housing at moderate, low, and very low-income levels, payment of an in-lieu fee, or dedication of land for affordable housing.

All new residential development projects within the City must dedicate at least 15 percent of the units for affordable housing. Restricted, for sale units must be sold to low- and moderate-income households. Rental projects must rent at least 10 percent of the units to very low-income households, with the remaining 5 percent of affordable units rented to low- or moderate- income households. In exchange for the construction of affordable units the City allows unit size reduction and different interior finishes for affordable units, as long as they are of durable quality and consistent with the current state building code.

In lieu of constructing all or any affordable units on site, a developer may pay an affordable housing in-lieu fee of \$3,750 per unit to the City. In lieu of building inclusionary units, the developer may also choose to dedicate land within the city to the City. Dedicated parcels must be suitable for the construction of inclusionary units and equivalent or greater in value than what would be produced by applying the City's in-lieu fee to the project. All in-lieu fees are deposited in an inclusionary housing fund to be spent on affordable housing development and programs.

The City provides regulatory relief for developers of sites that cannot accommodate affordable units. If the City determines that providing on-site inclusionary housing is infeasible, the developer may construct affordable units on another site within the City prior to or concurrently with construction of the on-site project. Should a developer provide more affordable units than required by the inclusionary ordinance, they may transfer credit for those affordable units to their next project in Highland or to another developer. However, the Inclusionary Housing Ordinance provides requirements that are inconsistent with the minimum density bonus and incentives outlined in the State's Density Bonus Law. **Program 4, Inclusionary Housing**, of the Housing Element includes a program to continue the City's Inclusionary Housing Ordinance to provide funding for affordable housing preservation, rehabilitation, and construction.

During the 2014-2021 Housing Element cycle, no inclusionary housing units were constructed. In lieu of construction, developers opted to pay the affordable housing in-lieu fee of \$3,750 per unit. As of January 2021, the current balance from in-lieu fees is \$569,000 and the funds have not yet been used for preservation or construction of affordable housing.

### 1.5.4 Density Bonus

A density bonus is an entitlement to build additional residential units above the maximum number of units allowed per the Municipal Code in exchange for providing affordable housing specified by as Government Code Section 65915-65918.

For projects consistent with the applicable affordable requirements, jurisdictions must grant one density bonus, and, if requested by the applicant, incentives or concessions, and waivers or reductions of development standards depending on the percentage of affordable units. Concessions and incentives include reductions in site development standards or a modification of zoning code or architectural design requirements, such as a reduction in setback or minimum square footage requirements, approval of mixed use zoning, or other incentives or concessions which result in actual cost reductions. In accordance with state law, projects that meet the minimum criteria for a density bonus are entitled to at least one concession and may be entitled to as many as four concessions depending on the amount of affordable housing provided:

The City's Land Use and Development Code (section 16.40.090, Development density) outlines the density bonus, and incentives or concessions that are available to affordable housing and qualifying residential projects; however, the City's density bonus ordinance approved in 2013 is no longer in compliance with the state's latest density bonus law.

Under AB 2345 amending code section 35915, which took effect on January 1, 2021, the maximum available density bonus for projects not composed exclusively of affordable housing increased from 35 to 50 percent. To receive the top bonus, a project must comply with unit replacement requirements and set aside at least (1) 24 percent of units for low-income households, (2) 15 percent of units for very low-income households, or (3) 44 percent of for-sale units for moderate-income households. Bonuses between 35 and 50 percent will be granted on a sliding scale, while current affordability requirements to obtain a lesser bonus will remain unchanged. The City's density bonus ordinance does not meet the current State Law maximum density bonus of 50 percent.

**Program 6, Density Bonus**, will update the City's density bonus ordinance to comply with the current State Density Bonus Law, including the provision for an increased bonus for 100 percent affordable developments and student affordable housing.

## 1.6 Residential Development Standards

The General Plan Land Use Element establishes the maximum density for housing and where it can generally be located within Highland. The Land Use and Development Code provides more specific residential development standards that determine building height, density, setbacks, parking, etc. Development standards tailored to each zoning district and certain specific uses are provided to ensure quality design to protect the health, safety, and welfare of the public as well as enhance the appearance of the community. Development standards improve the quality and livability of housing development in Highland.

Table 3 lists the minimum acceptable standards for development within the City's residential districts to assure safe and attractive development without hindering the production of housing.

**Table 3. Residential Development Standards**

Standard	A/EQ	R-1	R-2	R-2C	R-3	R-4	HDS	VR	EHV
Maximum Density (units per acre)	2.0	6.0	12.0	9.0	18.0	Max: 30.0	Max: 30.0	6.0	6.0
Minimum Density (units per acre)						Min: 20.0	Min: 20.0		
Minimum Building Site (net area in sq. ft.)	20,000	7,200	7,200	43,560 (1 acre) <sup>1</sup>	10,000	43,560 (1 acre) <sup>1</sup>	43,560 (1 acre) <sup>1</sup>	7,200	5,000 <sup>2</sup>
Minimum Lot Width	100 ft.	60 ft.	60 ft.	22 ft.	100 ft., 110 ft. for corner lots	None	None	100 ft.	50 ft.
Minimum Lot Depth	120 ft.	100 ft.	100 ft.	40 ft.	100 ft.	None	None	100 ft.	100 ft.
Minimum Front Setback	35 ft., but 65 ft. from street centerline	25 ft., but 55 ft. from street centerline	20 ft.	15 ft. at any given point, but an average minimum of 20 ft.	25 ft.	15 or 25 ft.	15 or 25 ft.	15	19 ft.
Minimum Interior Setback <sup>3</sup>	10% of lot width	5 ft. and 10 ft.	5 ft. and 10 ft.	0 ft. for attached units and 3 ft. for detached units	10 ft.–15 ft.	15 ft. or 25 ft.	15 ft. or 25 ft.	An aggregate of 15 ft. compatible with adjacent setbacks	10% of lot width
Minimum Street Side Setback <sup>3</sup>	15% of lot width	15 ft.	15 ft.	15 ft. at any given point, but an average minimum of 20 ft.	20 ft.	15 ft. or 25 ft.	15 ft. or 25 ft.	15 ft.	10 ft.
Minimum Rear Setback	35 ft.	20 ft.	20 ft.	10 ft. for 1- or 2- story units	15 ft.–20 ft.	15 ft.	15 ft.	20 ft.	10 ft.
Maximum Lot Coverage	30%	40%	40%	40%	60%	None	None	30%	30%

Maximum Height	35 ft. or 2 ½ stories, whichever is greater	35 ft. or 2 ½ stories, whichever is greater	35 ft. or 2 ½ stories, whichever is greater	35 ft. or 2 stories, whichever is greater	35 ft. or 2 ½ stories, whichever is greater	55 ft. (4 stories and loft)	55 ft. (4 stories and loft)	Compatible with surrounding buildings	35 ft. or 2 stories, whichever is greater <sup>4</sup>
Minimum Building Separation <sup>5</sup>	15 ft.	10 ft.	10 ft.	0 ft. for attached units and 3 ft. for detached units	15 ft.	Per Uniform Building Code	Per Uniform Building Code	10 ft.	10 ft.
Minimum Dwelling Unit Size (sf)	800	800	800	800	800	Studio: 425 1 bedroom: 650 2 or more bedrooms: 800	Studio: 425 1 bedroom: 650 2 or more bedrooms: 800	800	800

**Table 3. Residential Development Standards Continued**

Standard	Mixed Use		
	Attached Mixed Use Structures	Separated Multiple Use Projects Attached	Separated Multiple Use Projects Detached
Maximum Density (units per acre)	18	18	18
Minimum Building Site (net area in sq. ft.)	None	10,000	4,000
Minimum Lot Width	None	80 ft.	50 ft.
Minimum Lot Depth	None	100 ft.	80 ft.
Minimum Front Setback	0 ft. if public plaza of at least 400 square ft. and a minimum dimension of 15 ft. in each direction provided in front yard; 5 ft. if no public plaza provided in front yard	15 ft. average; 10 ft. minimum	10 ft.; 5 ft. for unenclosed porch
Minimum Interior Setback <sup>3</sup>	None if adjacent to commercial or office uses; If adjacent to residential uses, then 10 ft. if 2 stories or less, and 15 ft. if 3 or more stories	15 ft. if adjacent to commercial; If adjacent to residential uses, then 10 ft. if 2 stories or less, and 15 ft. if 3 or more stories	5 ft.
Minimum Street Side Setback <sup>3</sup>	None	15 ft.	10 ft.
Minimum Rear Setback	35 ft.	If adjacent to residential uses, then 10 ft. if 2 stories or less, and 15 ft. if 3 or more stories	15 ft.
Maximum Lot Coverage	30%	50%	40%
Maximum Height	35 ft. or 2 ½ stories, whichever is greater		
Minimum Building Separation <sup>5</sup>	15 ft.	10 ft.	
Minimum Dwelling Unit Size (sf)	One-bedroom = 600 sq. ft.; Two-bedroom = 800 sq. ft.; Three-bedroom = 1,000 sq. ft.	One-bedroom = 800 sq. ft.; Two-bedroom = 1,000 sq. ft.; Three-bedroom = 1,200 sq. ft.; Four-bedroom = 1,400 sq. ft.	

Source: City of Highland Land Use and Development Code, 2020.

1. R-2C parcels smaller than one acre in size may be developed if they cannot be consolidated with adjacent parcels and are either bordered on all sides by property zoned for non-R-2C uses; or bordered on three sides by roadways.

2. Lots may only be merged to meet minimum requirements. However, no lots shall be subdivided to meet minimum standards.

3. Except for development in the R-2C District, a minimum 10-foot setback shall be maintained for all two-story or higher elements.

4. Design of two-story unit buildings or additions within the East Highland Village (EHV) District shall be in compliance with HMC 16.16.040(F), East Highland Village Design Guidelines.

5: Minimum distance between buildings includes main dwellings and accessory structures. Within a planned development, building separations may be reduced to zero feet, provided that fire walls are to UBC standards and subject to review and approval of the Forestry and Fire Warden Department.

## 1.6.1 Parking Requirements

Parking requirements must relate to the housing type to provide adequate and appropriately located parking facilities. Adequate parking for residential projects contributes to the value of a project, the safety of residents, its appearance, and livability. However, excessive parking standards that do not reflect actual parking demand can unduly increase development costs by reducing the potential land availability for additional units or project amenities. Cities statewide are also finding that parking is a contributing constraint to building affordable housing, reflective in the cost of one parking space.

Reductions in parking requirements are currently made possible through parking studies for senior housing types and the Community Development Director may approve reduced parking requirements for projects that incorporate affordable units but do not qualify for density bonus incentives.

Additionally, **Program 33, Reduced Parking Requirements** will provide a process by which parking requirements can be reduced for religious institutions in exchange for housing development. Table 4 displays City residential parking requirements.

<b>Table 4. Residential Parking Standards</b>	
Use	Minimum Off-Street Requirements
Single-Family Detached <sup>1</sup>	Resident parking: 2 enclosed garage spaces Guest parking: If guest parking is not permitted on the street, then one visitor space per unit is required within 100 ft. of each unit's frontage and cannot be tandem
Second Units	Resident parking: 1 additional off-street parking space, tandem allowed, allowed in the front yard setback
Single-Family Attached and Multifamily (R-2, R- 2c, R-3) <sup>2,3</sup>	Resident Parking Studio: 1 covered or garage space assigned to each unit 1 bedroom: 1 covered or garage space, and .5 uncovered space 2 or more bedrooms: 1 covered or garage space and 1 uncovered space Guest parking: On-street parking can count for visitor parking if the spaces are within 250 feet of each unit's frontage, otherwise .5 uncovered space per unit is required
Multifamily(R-4) <sup>4,5</sup>	Resident Parking Studio and 1 bedroom: 1.5 per unit (at least 1 space within a garage or carport) bedrooms: 1.9 per unit bedrooms: 2.1 per unit bedrooms: 2.4 per unit Guest parking: 0.3 spaces per unit
Senior Housing	Resident parking: 1 covered space per unit Guest parking: 0.25 space per unit (can be uncovered)
Senior Congregate Care <sup>6</sup>	Resident parking: 0.5 covered spaces per unit or as determined by the Planning Commission. For multiple-family units, the parking shall be within 150 feet of the dwelling it serves Guest parking: 0.25 space per unit (can be uncovered)
Mobile Home Parks and Subdivisions	Resident parking: 2 spaces per unit, tandem allowed Guest parking: 1 space for each 5 units or fraction thereof
Model Home Complexes <sup>7</sup>	3 spaces per model home plus 1 space per salesperson

Source: City of Highland Land Use and Development Code, 2020.

1: Within the VR district no more than a two-car space and no less than a one-car space shall be provided within a garage, and the exterior garage door shall be a minimum of 45 ft. from the front property line.

2: For R-2 and R-2C districts, covered spaces may be required to be in enclosed garage. If it is not adjacent, the garage shall be within 150 feet of the unit being served.

3: Covered spaces for apartment buildings are garage spaces.

4: Minimum of one parking space shall be covered within a garage or carport.

5: Guest spaces may be uncovered.

6: Applicant shall submit a parking study for reduced parking standards.

7: On-street parking adjacent to the model home complex may be counted toward the parking requirement if it is found that on-street parking will not impact residential parking and will not obstruct traffic flow.



## 1.6.2 Building Codes

Building and safety codes regulate construction and design methods to protect public health, safety, and welfare. However, these codes have the potential to constrain the development of housing. Highland has adopted and enforces the 2019 California Building Code. Except for seismic standards and some additional requirements for fire hazards, the City's Building Codes do not impose additional requirements that would materially raise the cost of housing. These types of improvements are common for all cities in San Bernardino County.

Code enforcement is a critical component of retaining quality neighborhoods and residential structures. The City employs full-time building inspectors and code enforcement officers to examine properties. As part of the City's residential rental enhancement program, the owner or occupant of any residential rental unit may request that the city conduct both an interior and exterior inspection of said residential rental unit(s). Inspections may be based upon, but are not limited to, receipt of complaints from occupants, local agencies, or other third parties.

The City's rental inspection program includes a self-certification inspection process conducted by the owner of a residential rental unit, and subsequent right-of-way inspection from the public right-of-way to certify that health and safety, building code and fire code violations do not exist on the rental unit. The program ensures rental housing is well- maintained, safe, and adequate for habitation. **Program 2, Residential Rental Enhancement and Rehabilitation** will continue to educate landlords and property owners about compliance with applicable City Codes, procedures of the Residential Rental Enhancement Program, and how to notify code enforcement of any violations.

## 1.6.3 On- and Off-Site Improvements

The City of Highland requires that adequate access, landscaping, lighting, water, and sewer improvements accompany residential development or the expansion of existing residential projects. Typical off-site improvements include curb, gutter, and sidewalk installation and the undergrounding of existing overhead utility lines. As a condition of approval, the City may require the dedication of improvements such as rights-of-way, easements, and the construction of reasonable on- and off-site improvements to serve the project. These types of improvements are common for all cities in San Bernardino County. Therefore, these on- and off-site improvement standards would not make it less financially feasible to build housing in one jurisdiction over another.

### 1.6.3.1 Streets

All residential projects must provide appropriate roadways consistent with the City's Circulation Element and adopted road standards.

Collector streets require a minimum 40 feet wide curb-to-curb and are, generally, 44 feet, curb-to-curb, within 66-foot rights-of- ways. Residential local streets generally require a 36-foot right-of- way. The City does not require infill projects to provide road improvements beyond those necessary for safe access. This reduces the cost of infill housing development, a savings that may be passed on to the future buyer or renter. For any area of the City, additional improvements, easements, and other dedications may be identified during site plan review.

### 1.6.3.2 Curbs, Gutters, and Sidewalks

While much of west Highland is developed with curbs, gutters, and sidewalks, there are some infill sites without such amenities.

Greenfield sites on the eastside are also often in need of such improvements. All new residential development is required to provide a public sidewalk system with curbs and gutters unless deemed unnecessary by the Planning Commission. Public sidewalks are adjacent to public streets and have a minimum width of 5 feet.

Interior walkway systems may have varying widths, with a minimum width of 4 feet. The cost of these improvements increases development costs but are necessary to facilitate pedestrian access and movement in urban areas of the City, and to enhance the safety of pedestrian traffic.

#### *1.6.3.3 Water, Sewer, and Storm Drain*

Consistent with state law, all projects must demonstrate the ability to meet water, sewer, and drainage requirements consistent with San Bernardino Flood Control District's Comprehensive Storm Drain Plan. Fees and infrastructure requirements are established by the East Valley Water District (EVWD) and similar for all communities in the region. Careful site design and location can reduce or mitigate the associated cost of these improvements. For example, vacant land in an infill area could provide affordable housing where there is existing and adequate water, sewer, and drainage infrastructure.

## 1.7 Development Fees

A variety of fees and assessments are charged by the City and other agencies to cover the cost of processing development permits and providing local services. These fees are necessary to ensure quality project review and to cover costs associated with the impact of new housing. Development fees and exactions increase the cost of development. These costs are passed down to the homeowner and renter, reducing the affordability of housing.

Community development and engineering fees are established to cover the cost of staff review. Without entitlement processing fees, the City would be unable to provide quality review of each project, resulting in inappropriate or inadequate development. These fees offset the City's development review costs and are not designed to increase the cost of development. The affordable housing fee is a per-unit fee that may be paid by the applicant in lieu of providing affordable housing as discussed in the Inclusionary Housing Ordinance section.

When processing a Major Design Review and CUP concurrently, the City provides relief to the applicant by only charging one deposit up-front. The City only takes a deposit for the CUP and applies any unused funds from the CUP deposit to cover the design review. This prevents the applicant from spending a financial resource earlier than necessary.

Development impact fees are charged on a per-unit basis to provide funds to offset the anticipated impacts of population growth. New housing, and therefore more residents, may result in an increase in vehicle trips, park usage, school enrollment, and emergency service calls. Development impact fees are carefully created to ensure that quality services and facilities are provided to Highland residents without unduly burdening development. The City annually reviews its development impact fees to ensure the fees are fair and adequate. Table 5 displays fees charged for new housing projects in Highland.

<b>Table 5. Residential Development Fees</b>		
<b>Fee</b>	<b>Single-Family Attached</b>	<b>Single-Family Attached/ Multifamily</b>
<b>Minor Project (3 or fewer dwelling units)</b>		
<b>Community Development Fees</b>		
Inclusionary Housing	\$3,750.00	\$3,750.00
Staff Review Permit	\$45.00	\$45.00
Minor Design Review – Fixed Fee	\$3,450.00	\$3,450.00
Minor Conditional Use Permit – Fixed Fee	\$1,425.00	\$1,425.00
Community Development Fees/Deposit Per Unit	\$8,670.00	
<b>Engineering Fees<sup>1</sup></b>		
Parcel Map Review ( $\leq 4$ lots) <sup>2</sup>	\$5,300.00	\$5,300.00
<b>Impact Fees</b>		
Law Enforcement	\$276.23	\$436.83
Fire Suppression	\$981.10	\$318.42
Local Circulation System	\$4,582.61	\$3,058.86
Regional Circulation System	\$13,289.35	\$8,872.35
Regional Flood Control	\$1,068.24	\$457.13
General Facilities, Vehicles & Equipment	\$1,224.67	\$1,224.67
Library	\$1,126.68	\$1,084.50
Community Center	\$1,404.31	\$1,351.22
Park Land Acquisition & Park Facilities Development	\$4,573.40	\$4,400.64
Total Fees Per Unit <sup>3</sup>	\$37,196.64	\$29,874.61
<b>Major Project (more than 3 units)</b>		
<b>Community Development Fees</b>		
Inclusionary Housing	\$3,750.00	\$3,750.00
Major Design Review Deposit <sup>2, 4</sup>	\$8,500.00	\$8,500.00
Major Conditional Use Permit Deposit <sup>2, 4, 5</sup>	\$11,100.00	\$11,100.00 <sup>5</sup>
Community Development Fees/Deposit Per Unit	\$23,350.00	
<b>Engineering Fees<sup>1</sup></b>		
Parcel Map Review ( $\leq 4$ lots) <sup>2</sup>	\$5,300.00	\$5,300.00
Final Tract Map Review ( $\geq 5$ lots) <sup>2, 4</sup>	\$15,300.00	\$15,300.00
<b>Impact Fees</b>		
Law Enforcement	\$276.23	\$436.83
Fire Suppression	\$981.10	\$318.42
Local Circulation System	\$4,582.61	\$3,058.86
Regional Circulation System	\$13,289.35	\$8,872.35
Regional Flood Control	\$1,068.24	\$457.13
General Facilities, Vehicles & Equipment	\$1,224.67	\$1,224.67
Library	\$1,126.68	\$1,084.50
Community Center	\$1,404.31	\$1,351.22
Park Land Acquisition & Park Facilities Development	\$4,573.40	\$4,400.64
Total Fees Per Unit <sup>3</sup>	\$72,476.64	\$65,154.61

Source: City of Highland Planning Division, 2020.

- 1: Some engineering fees not included, such as grading plan check and grading inspection, because fee is based on project specifics such as a dollar amount per cubic yard of soil moved.
- 2: RCS "fully burdened hourly rate for all personnel involved, plus any out-of-pocket expenses for contract personnel, special equipment or supplies, other state or county fees applicable against an initial deposit.
- 3: Total Fees Per Unit including Community Development Fees/Deposit Per Unit, Engineering Fees and Impact Fees listed in this table.
- 4: For projects that are deemed to be less complex after review by the DRC, the amount of the initial deposit can be reduced accordingly by the Community Development Director.
- 5: Major Conditional Use Permit Review Deposit will not be needed for projects on multifamily sites identified in the Housing Element as having potential to accommodate the lower-income RHNA.

## 1.8 Permit Approval Process

Highland's permitting process is designed to ensure high quality and aesthetically pleasing development that is compatible with adjacent uses and the City's rural charm. Development and design review fees, as well as the time these processes take, increase the cost of constructing new housing or rehabilitating existing units. To ensure that the permit approval process is not overly burdensome, the City established the "Come Home to Highland" program, which commits the City to being an active partner in providing housing. This program serves as an Action Plan for the City Staff to follow when reviewing all commercial and residential development projects. The program is intended to:

- Improve and enhance Highland through the promotion of its residential lifestyle and family-oriented community;
- Encourage housing maintenance, rehabilitation, development, and occupation; and
- Encourage cooperation between City government, local service providers, and residents in facilitating responsible growth.

The City of Highland is committed to the following Action plan to facilitate and streamline the development review process:

- The fees to process entitlement should be deposit, and an accounting of time by which staff processes the entitlement shall be provided to the project applicant within 30 calendar days of the project's conclusion.
- Pre-application meetings should be offered free of charge.
- Upon acceptance of an application for an entitlement, the Community Development Department and Public Works Department shall bring the application before the appropriate reviewing body within 90 days of acceptance barring special environmental, traffic or similar technical report requirements.
- Fixed fees for plan checking and inspection services upon the issuance of permits.
- First plan check shall take no more than 2 weeks, and if determined to take longer staff shall notify applicant as to the reasons for the delay.

Three levels of decision-making bodies in the City govern the development review process: The Community Development Department, the Planning Commission, and the City Council.

Applicants are encouraged to submit a pre-application to meet with City staff to discuss a project prior to submitting a formal application. This process provides the applicant with an opportunity to make changes that will ultimately save time and money by having a complete application from the start. When an application is determined complete (within 30 days, as required by the Permit Streamlining Act), the Planning Division indicates whether or not a use requires discretionary review. The "Come Home to Highland" program guarantees that any request for an entitlement that requires approval by the Planning Commission be presented to the necessary body within 90 days of the application being

deemed complete (excluding time for CEQA review). Limiting processing time reduces the impact of design review and other forms of discretionary review. There are several types of review necessitated by certain project characteristics.

### 1.8.1 Staff Review Permit

Staff Review Permit (SR) is a review of the project use to ensure compatibility with the City's land uses and development standards. Approval is determined by the Community Development Director or his designee (typically the City's Planning Technician). The SR permit is processed concurrently with the Minor Design Review process when applicable. The SR approval by Community Development Director or designee is final unless appealed to the Planning Commission. The Planning Commission's determination is appealable to the City Council.

### 1.8.2 Minor Design Review

The Planning Division provides this form of administrative design review for permitted housing projects with three or fewer units to ensure compliance with City's land use and development standards. The Planning Division makes standard findings regarding project design, which include compliance with adopted residential design standards and consistency with the City's General Plan Land Use Element and Community Design Element. Approval is determined by the Community Development Director or designee and is deemed final unless appealed to the Planning Commission. The Community Development Director may also at his or her option refer any minor design review to the planning commission for action. The Planning Commission's determination can then be appealed to the City Council.

### 1.8.3 Major Design Review

The Major Design Review (Major DR) applies to new housing projects consisting of four or more units. Major DR is performed by the Planning Commission (PC). Major DR provides the Planning Commission with an opportunity to assess the project for consistency with the applicable elements of the City's General Plan and design guidelines and identify potential design issues that may detract from the aesthetics, health, and safety of neighborhoods. These projects will be reviewed for consistency with the design and development standards provided in the Land Use and Development Code, General Plan Land Use Element, and Community Design Element. Planning Commission review takes place during the time period the development application is routed for agency comments and/or the CEQA process; thus, minimizing overall processing time for the project. Planning Commission approval is final unless appealed to City Council.

### 1.8.4 Conditional Use Permit

The conditional use permit (CUP) process is the City's opportunity to ensure compatibility with surrounding uses and this review can occur concurrently with Major Design Review. The existing Land Use and Development Code requires a conditional use permit for multifamily projects, with the exception of single-family attached duplex, triplex and fourplex's in the R-3 and R-2C zones permitted by SR permit; multi-family attached projects in the R-4 or HDS districts; and multifamily uses on multifamily sites identified in the Housing Element. In the case of the R-4 and HDS, only a Design Review Process is required.

The Planning Commission is responsible for reviewing all applications that require a CUP and the design review of a project. Typical findings for CUP approval include consistency with the goals, policies, and

objectives of the General Plan, suitability of the site for the proposed use or development, and adequacy of water, sanitation, and utilities.

Design review is based on criteria included within the General Plan Land Use Element and Community Design Element. The CUP (with Major DR) process typically takes nine to twelve weeks, not including the time required by CEQA if an EIR is necessary.

### 1.8.5 General Plan Amendment/Zone Change

Projects requiring a General Plan Amendment or zone change require review by the Planning Commission and approval by the City Council, regardless of proposed use. However, the City typically reduces the timeframe for this legislative step by processing, where feasible, the discretionary permits at the same time.

### 1.8.6 Processing Time

Developmental review is the primary way to ensure that new residential projects reflect the community’s goals and contribute to improving local quality of life. The time it takes to obtain permits from the City can affect overall project cost and therefore impact the cost of housing and the success of development in the community.

Highland values the time and money of its development applicants. The City reduced its processing times through enforcement of the “Come Home to Highland” program, which commits the City to establishing fixed fees for several forms of review and ensures that a discretionary permit application is brought to the appropriate review body within 90 days of the application completeness determination. Table 6 shows the average processing times for various project applications and reviews.

Type of Application	Timeframe (days)
Zone Change	90
Tentative Tract or Parcel Map	90
Conditional Use Permit	90
Variance Review	45
Lot Line Adjustment	60
Staff Review (Design/Use)	5-10
Minor Design Review	45
Major Design Review	60-90

## 1.9 Housing for Persons with Disabilities

Effective on January 1, 2002, Senate Bill 520 amended housing element law and Government Code Section 65008 to require localities to analyze the constraints on housing for persons with disabilities. The City’s adopted building codes (including the 2019 California Building Code, California Existing Building Code, and California Residential Code (Title 24)) require that new residential construction comply with the Federal Americans with Disabilities Act (ADA). Highland has the authority to enforce state accessibility laws and regulations (California Code of Regulations Title 24) when evaluating new construction requests. ADA provisions include requirements for a minimum percentage of units in new development to be fully accessible to the physically disabled. Compliance with provisions of the federal

ADA is assessed and enforced by Highland’s Building Official. **Program 17** of the Housing Element will provide resources for information on home retrofits and accessibility in ADUs to increase the supply of units available for those with disabilities.

### 1.9.1 Reasonable Accommodation

The City of Highland understands the importance of reducing barriers to provide adequate housing for disabled persons. Chapter 16.40 in the Land Use and Development Code provides a formal process for requesting reasonable accommodations for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts) in the application of zoning laws and other land use regulations, policies and procedures. A reasonable accommodation refers to actions that a city takes to modify land use and zoning regulations affecting housing for people with disabilities. A reasonable modification is typically a structural change made to existing premises so that a disabled person can fully utilize the premises.

Requests for a reasonable accommodation are submitted on an application provided by the Community Development Department, or in the form of a letter. Requests are reviewed by the Director of Community Development and written determination is provided within 45 days that either grant, grant with modifications, or deny a request for reasonable accommodation. If the project for which the request for reasonable accommodation is being made also requires some other discretionary approval, then the applicant must also file an application for discretionary approval. The authority responsible for reviewing the discretionary land use application will make a written determination.

The City’s Land Use and Development Code handicapped parking requirements are established by, and intended to be identical to, the requirements established by the state of California. Residential projects providing handicapped spaces are required to locate the spaces as close to building entrances as possible and follow citywide regulations in terms of size, striping, and signage. Disabled parking standards for residential uses are not different from parking standards for other uses.

### 1.9.2 Residential Care Facilities

Group homes, boarding houses, and residential care facilities are often a resource for disabled persons in need of special care. Large residential care facilities serving seven or more persons, called “Board and care facilities” in the uses table, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS), and conditionally permitted in commercial zones (CG, NC, PC, VC). The City does not have any occupancy restrictions based on relatedness or family ties in any land uses or zoning designations.

**Program 18, Residential Care Facilities**, is proposed to amend the Zoning Ordinance to define and specify that residential care facilities are allowed by right in residential zones consistent with state law for small group homes (six or fewer) and with a Use Permit for large facilities (seven or more).

### 1.9.3 Senior Housing and Facilities

Other forms of housing that may assist disabled persons include senior independent living projects, residential care homes for the elderly, congregate care, and convalescent care. Senior independent living projects are permitted with a Staff Review Permit in the A/EQ, R-1, VR, and EHV zones, and conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and the mixed use zone (MU). Congregate care, assisted living, and convalescent care homes are conditionally permitted in multifamily, mixed use, and commercial zones. Residential care facilities, which can include residential care facilities for the elderly per the City’s definition, serving seven or more persons, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS).



## 2 MARKET CONSTRAINTS

Market constraints to the development of residential housing include the cost of land, the cost of construction, and financing. Changes in the financial markets, changes in construction material costs, and other factors all affect the feasibility of developing new housing in Highland. This section discusses land costs, construction costs, and financing issues.

### 2.1 Availability of Financing

#### 2.1.1 Construction Financing

Construction financing costs also affect the feasibility of building new housing. During the housing boom of the late 1980s, it was not uncommon for developers to receive construction loans for 100% or more of a project's estimated future value. Following the housing market downturn of the early 1990s, however, financial institutions tightened regulations for construction loans, often requiring developers to put up at least 25 percent of the project value. These trends continue today, meaning that developers must usually supply at least 25 percent of the project value upfront, and perhaps more if the total cost is more than 75 percent of the estimated value of the project.

Although there is no hard threshold for how much required upfront equity is too much before a residential project would be infeasible, the higher the proportion of equity required, the more unlikely that a developer would proceed with the project. Not only would it require more up-front cash, but higher equity contribution means a project must be able to achieve an even higher value at completion in order to generate the cash flow needed to meet acceptable cash-on-cash returns. These trends are anticipated to continue during the planning period.

#### 2.1.2 Mortgage Financing

Although recent economic conditions have seen housing prices increase and interest rates remain low, buying a house or refinancing a mortgage is getting tougher, as banks raise requirements such as minimum credit score. Loan applicants with short credit history, lower incomes, self-employment incomes, or other unusual circumstances have had trouble qualifying for loans or are charged higher rates. This economic barrier could disproportionately affect lower income, non-white borrowers, making it harder for them to close on a loan, especially as a result of the Coronavirus pandemic and resulting economic fallout. The economic fallout has resulted in the unemployment rate increase in the City from 3.8% in 2019 to 8% as of November 2020, making it more difficult for unemployed or underemployed, and lower income borrowers and other groups who historically have found it the most difficult to get a loan, and to get a fair loan.

The Home Mortgage Disclosure Act requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. This requirement applies to all loan applications for home purchase, improvements, and refinancing, whether financed at market rate or with government assistance. These data help show whether lenders are serving the housing needs of their communities; they give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory.

Table 7 summarizes the disposition of loan applications submitted to financial institutions in 2019 for home purchase, refinance, and home improvement loans in Highland. The loan outcome information in the table includes the proportion of applicants that were approved, were denied, or were incomplete or withdrawn by the applicant.



Table 7. Disposition of Home Loans (2019)				
Loan Type	Total Applicants	Percent Approved <sup>1</sup>	Percent Denied	Percent Other <sup>2</sup>
Government-backed Purchase	426	74.9%	8.5%	16.7%
Conventional Purchase	661	73.4%	7.3%	19.4%
Refinance	1,845	58%	16%	25.9%
Home Improvement	182	35.2%	51.1%	13.7%
Total	3,114	62.3%	15.2%	22.5%
<sup>1</sup> Approved includes loans approved by the lenders whether or not accepted by the applicant. <sup>2</sup> Other includes loan applications that were either withdrawn or closed for incompleteness. Source: 2019 Home Mortgage Disclosure Act Lending Activity MSA/MD by Census Tract Data				

### 2.1.2.1 Home Purchase Loans

In 2019, a total of 426 households applied for government-backed loans (FHA, FSA/RHS & VA) in Highland. Of those applications, 75 percent were approved, and 8 percent were denied. More households applied for conventional loans to purchase homes in Highland, with a total of 661 applications. 73 percent of the conventional loan applications were approved, and 7 percent were denied.

### 2.1.2.2 Refinance Loans

The highest number of applications received were for refinance loans, likely because many homeowners are looking to swap out their old mortgages for new loans at record-low rates. A total of 1,845 households in Highland applied for a home refinance loan in 2019. Of those applications, only 58 percent were approved, 16 percent were denied, and 26 percent were either withdrawn or closed for incompleteness.

### 2.1.2.3 Home Improvement Loans

In 2019, only a total of 182 household applied for home improvement loans in Highland. This is the lowest number of applications but had the highest percentage of applications denied. Of the total applications, 51 percent of home improvement loans were denied by lending institutions and 35 percent were approved. One of the most important factors that lenders evaluate when reviewing an application is the applicant’s debt-to-income ratio, which indicates how much income the monthly debt takes up. Most home improvement loans applicants may have high debt-to-income ratios from their mortgage loan, which may explain why it is harder to qualify for the additional financing.

## 2.2 Construction Costs and Construction Labor Shortage

Residential construction continues to face limiting factors, including concerns over regulatory cost burdens, an ongoing labor skills shortage, and higher costs and longer delivery times for building materials. Factors that affect the cost of building a house include the type of construction, materials, site conditions, finishing details, amenities, structural configuration, and project characteristics such as the type and quality of the unit.

On average, 60 percent of the final cost of a single-family home is attributed to construction costs. According to the US Census Bureau, Annual Characteristics of New Housing Survey, the Average Contract Price per Square Foot of New Contractor-Built Single-Family Houses averages approximately \$158 per square foot.

One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include foundation work, structural and nonstructural building components, electrical, plumbing, mechanical and interior finish material. The data is a national average and does not take into account any regional cost differences, nor include the price of the land upon which the building is built. According to the latest Building Valuation Data release in 2019, the national average for development costs per square foot for apartments and single-family homes in 2019 are as follows:

- Type I or II, R-2 Residential Multifamily: \$148.82 to \$168.94 per sq. ft.
- Type V Wood Frame, R-2 Residential Multifamily: \$113.88 to \$118.57 per sq. ft.
- Type V Wood Frame, R-3 Residential One and Two Family Dwelling: \$123.68 to \$131.34 per sq. ft.
- R-4 Residential Care/Assisted Living Facilities generally range between \$143.75 to \$199.81 per sq. ft.

In general, construction costs can be lowered by increasing the number of units in a development, until the scale of the project requires a different construction type that commands a higher per square foot cost. Apartments of three stories or less achieve an economy of scale, provided that the building has typical amenities and no structured parking. Mobile homes are significantly less expensive, as are precision or factory-built housing products.

Labor costs also greatly contribute to construction costs. They are generally two to three times the cost of construction materials. A 2019 study for Smart Cities Preval found that California lost about 200,000 construction workers since 2006. Many lost their job during the recession and found work in other industries. Pre-pandemic, the industry already faced this historic shortage of skilled labor and the labor gaps might get even larger, especially in states like California.

## 2.3 Land Costs

The cost of raw, developable land creates a direct impact on the cost for a new home and is considered a possible constraint. Land costs, when compared with projected rents and sales prices of housing, affect the feasibility of construction. A higher cost of land raises the price of a new home, which typically makes the cost of land a major factor in determining the cost of developing housing. Land costs are influenced by many variables, including supply, demand, location, site constraints, and the availability of public utilities and other infrastructure. Based on available land for sale as of January 2021, the average cost of undeveloped land in Highland is approximately \$167,000 per acre for single-family zoned developable parcels and \$440,000 per acre of multifamily zoned developable parcels.

In addition to the basic cost of land, the holding cost is also a consideration in the price of housing. Holding costs vary depending on interest rates for acquisition and development loans. Interest rates are beyond the control of local jurisdictions. However, land holding costs can be lessened by reducing processing times for building permits in most jurisdictions. Therefore, developers sometimes seek to obtain approvals for the largest number of lots allowable on a parcel of land.

## 3 ENVIRONMENTAL CONSTRAINTS

Environmental constraints can limit or affect the type of housing and density of housing development in a community. These constraints can include natural resources, hazards, or lack of sufficient infrastructure capacity. However, Highland is an urbanized community with the majority of the City's infrastructure already in place. Environmental and infrastructure constraints do not pose a significant constraint to housing production.

### 3.1 Environmental Features

#### 3.1.1 Biological Resources

Due to urbanization and growth, habitat is limited to the undisturbed areas of the northeast. Native habitats within the developed part of the City are few and include annual grasslands with nonnative grasses, disturbed areas with sparse amounts of native species, and landscaped areas. There are plant and wildlife communities within the City, many associated with the watercourses that traverse the City and drainage in the canyons of the foothills and mountains. The City is located north of the Upper Santa Ana River Wash Habitat Conservation Plan; however, the City itself is not within a Habitat Conservation Plan or other plan protecting biological resources. Biological resources are regulated and protected by federal (U.S. Fish and Wildlife Service), state (California Department of Fish and Wildlife), and the County (County of San Bernardino). Federal and state regulations require environmental review of proposed discretionary projects. Costs, resulting from fees charged by local governments and private consultants needed to complete the environmental analyses from delays caused by mandated public review period, also add to the cost of housing. However, the presence of such regulations is required to preserve the environmental and ensure environmental quality for Highland residents.

#### 3.1.2 Archaeological Resources

There are several sites to the north of the City and specific areas that have been designated as archaeologically sensitive areas with a high probability for discovery of archeological resources if disturbed by development. One of the Native American tribes closely associated with the City of Highland is the San Manuel Band of Mission Indians. To preserve archaeological resources and the history of the San Manuel Band of Mission Indians, the City's approach to preservation is through a site-by-site analysis using the development review process. Such analysis is required by state law through the California Environmental Quality Act and involves archival research, field reconnaissance/survey, and preparation of a Cultural Resources Report. If resources are identified within areas of proposed housing developments, the individual project applicant would work with the City and a qualified archaeologist to determine the proper mitigation for the site in question. As with biological resources, such analysis would add to the cost of housing; however, is required to avoid significant impacts to archaeologically sensitive sites.

#### 3.1.3 Water Resources

Water is provided to Highland by the East Valley Water District through groundwater, surface water, and imported water. Water providers in Southern California face the challenge of growing demand and uncertainty of supply. The Urban Water Management Plan Act requires water providers to evaluate supplies during normal year, single dry year, and multiple dry year scenarios, existing baseline water use, targets for future water use, demand management measures implemented or planned for implementation, water shortage contingency planning, and notification with other water agencies. It is estimated that the East Valley Water District would experience a 7% increase in demand from 2020-

2030. Assuming conservation behaviors continue among the population, and the East Valley Water District continues to identify new, cost-effective ways to supply water, Highland should be able to supply the water needed for the City's anticipated growth.

### 3.1.4 Energy Conservation

Rising energy costs, dependence on fossil fuels, and increasing evidence of the adverse impacts of climate change have provoked the need in California and nationwide to improve energy management strategies. Although California has always been a leader in energy conservation, recent regulations specifically target energy independence and Greenhouse Gas emissions. In 2006, the State Legislature adopted the Global Warming Solutions Act of 2006, which created the first comprehensive, state regulatory program to reduce GHG emissions to 80% below 1990 levels by 2050. Promoting energy conservation has become a consistent theme in California's regulations.

Highland understands that energy efficiency can greatly reduce the impact of residential development and provide cost savings for its residents. On a regulatory level, the City enforces the State Energy Conservation Standards (California Code of Regulations Title 24). These standards incorporated into the City's Building Code provide a great deal of flexibility for individual builders to achieve a minimum "energy budget" with various performance standards. These requirements apply to all new residential and commercial construction and to remodeling and rehabilitation construction only where square footage is added. Compliance with Title 24 of the California Administrative Code on the use of energy-efficient appliances and insulation has reduced energy demand stemming from new residential development.

Residential development in Highland is evaluated for energy efficiency during the plan review process. Every residential project must submit calculations per model showing compliance with Title 24. The applicant must describe the type of heating system and maximum capacity and provide the make, size, and model number for all air conditioning units, furnaces, and water heating equipment. More energy efficiency could be encouraged through an incentives program.

The City of Highland educates the development community and residents through informative materials made available in public buildings, the City's website, and the General Plan Open Space and Conservation Element. Part of this effort is promoting energy efficiency in existing structures through rehabilitation and appliance replacement and in new development through incentive programs provided by utility companies. The City also has policies that encourage energy conservation and housing objectives. For example, infill development discussed in the Housing Element and Land Use Element encourages housing development opportunities without creating sprawl. The 2014-2021 Housing Element updated the Land Use and Development Code to include the Residential HDS Overlay, permitting such multifamily units by-right. Additionally, multifamily housing types within the R-4 zone is permitted by-right. The HDS and R-4 zoning are located within urbanized portions of the City. These development types are consistent with State goals to encourage compact, walkable, and energy-efficient neighborhoods.

## 3.2 Environmental Hazards

Environmental hazards affecting housing development and resident safety include extreme heat, flooding, geologic hazards (landslides/slope instability, earthquakes, and liquefaction), and wildfires. These hazards provide the greatest threat to the built environment. Development should be carefully controlled in potentially hazardous areas. The City of Highland Safety Element, which provides policy

guidance about environmental constraints, was updated in 2021 and covers all of the areas within the land inventory.

### 3.2.1 Flooding

Flood risk is dispersed across Highland but is most centralized in the southern portion of East Highland just south of Greenspot Road and along City Creek. This area has a 1% chance of flooding annually, which is also known as a 100-year flood zone. Much of the area south of Greenspot Road and along City Creek is zoned as Open Space and Agricultural/Equestrian. This aids in allowing for natural drainage during extreme rain events. Highland has adopted special standards, such as minimum building elevations, flood proofing, and anchoring, for development in flood-prone areas. Any housing sites identified in the Housing Element that may be located in a 100- or 500-year floodplain, or other flood hazard zone, will be developed in accordance with strict regulations to properly mitigate flooding hazards in accordance with the Floodplain Management standards of the Highland Municipal Code (Chapter 16.76).

### 3.2.2 Landslides/Slope Instability

Steep slopes can experience landslides, debris flows, mudslides, and erosion. These effects impact where development can occur throughout the City and can result in damages to existing development. Areas at high risk of landslides include the northern and eastern areas due to their proximity to steep slopes and the rock strength in these areas. The City has regulations in place to reduce the potential for slope failure, erosion, and mudslides when new development is proposed in areas subject to geological risks.

### 3.2.3 Earthquake

Like the entire southern California region, the City of Highland is within an area of high seismic activity. It can be expected, therefore, that a significant seismic event will occur in the City. The timing and magnitude of such an event cannot be predicted, although planning efforts for emergency response must be predicated on the certainty of such an event. North and south branches of the San Andreas Fault, a known active fault, run through Highland. The San Jacinto Fault is approximately 4.5 miles southwest of the City. The City's Safety Element requires residential development to be set back a minimum of 50 feet from active and potentially active fault lines. The Safety Element includes other policies to increase mitigation measures and further study possible geologic- and seismic-related hazards.

### 3.2.4 Liquefaction

Liquefaction may damage structures on saturated, granular soils such as silt or sand during an earthquake. These geologic conditions are typical in valley regions within Highland. Areas at risk of liquefaction due to soil composition and heightened exposure to runoff cover nearly all of southeastern Highland, as well as western Highland. Detailed soils engineering investigations would be necessary in those areas where future development is proposed within liquefaction areas in order to further evaluate the liquefaction potential, and to further define the potentially affected areas of the City. However, because of the site-specific nature of geologic hazards, existing geologic conditions are not expected to adversely impact development within Highland. In addition to existing building codes and regulations, site specific geologic reports would recommend any necessary mitigation measures, if required, to reduce potential hazards associated with liquefaction.

### 3.2.5 Wildfire

The City of Highland's building codes require new housing to include fire sprinkler systems to protect residents and property. Wildland fires are a present threat, as there are large expanses of undeveloped hillsides in and adjacent to Highland. Most of the City of Highland is built in fire risk areas due to the proximity to forestland to the north and east of city limits. The most northeastern portions of Highland are located in very high fire risk areas, while much of the central and southern portions of Highland are high fire risk areas. Precautions such as fuel modification zones and vegetation maintenance help protect Highland's natural and developed areas from wildfire. The California Department of Forestry and Fire Protection (CDF) provides fire prevention and suppression services to the City and unincorporated areas east of the City. Additional wildland fire protection services are provided by the US Forest Service on National Forest Lands adjacent to the City.

## 3.3 Adequate Infrastructure Capacity

The City of Highland contains both developed and largely undeveloped residentially zoned areas. In developed areas, the existing infrastructure system is sufficient to support Highland's population, but water and sewer are limited in undeveloped areas within the City. Infrastructure in currently un-served areas will be planned and constructed as necessary to serve new development. These improvements are typically dedicated to the City, which is then responsible for maintenance and/or improvement.

Future housing growth is focused in commercial areas around existing bus stops that are served by existing sewer and water lines. All development plans in Highland must be coordinated with the East Valley Water District to meet wastewater disposal and treatment requirements established by the California Department of Health Services. Development impact fees will allow the water and wastewater districts to provide necessary connections and services.

### 3.3.1 Sewer System

The East Valley Water District provides sewer services to Highland and has a joint powers agreement with the City of San Bernardino to accept all sewage generated by the City. Although the sewer system is adequate for existing development in Highland, continued growth has the potential to impact the capabilities of the sewer system. Developers must coordinate with the East Valley Water District to meet sewer requirements. The East Valley Water District has adopted the 2019 Sewer System Management Plan (SSMP). As required by Order No. 2006-0003, Statewide General Waster Discharge Requirements (WDR), the SSMP will undergo review and revisions through internal audits every two years. The WDR also requires an agency to have a System Evaluation and Capacity Assurance Plan. This component involves preparing and implementing a Capital Improvement Program (CIP) that will provide the hydraulic capacity of key sewer systems for dry weather peak flow conditions, as well as appropriate design storm or wet weather event. The 2019 Sewer Master Plan identifies projects in prioritized order for pipelines showing capacity deficiency in the future planning horizon. After completing the projects identified in the 2019 Sewer Master Plan, the City's sewer system will operate with adequate capacity.

The sewage from Highland flows in a general direction from northeast to southwest towards the San Bernardino Water Reclamation Plant located at 299 Blood Bank Road in the City of San Bernardino. This plant is operated by the San Bernardino City Municipal Water Department, Water Reclamation Division. The plant processes an average sewage flow of approximately 26 to 27 million gallons per day (mgd) from the City of San Bernardino, the City of Highland and other areas. The plant has a total sewage capacity of 33 mgd. Expansion or construction of a new wastewater treatment facility to meet the demands of the 2021-2029 Housing Element update is not required.

### 3.3.2 Water System

The City's water supply sources are local groundwater, surface runoff from natural watershed and drainage areas, and imported water. The East Valley Water District manages the water supply through a system of pipelines, wells, reservoirs, pumping stations, and a treatment plant. This system includes approximately 19 active wells, 2 inactive wells, 18 reservoirs and 26 booster stations all located on 39 different plant sites.

The water distribution and transmission network varies considerably throughout the City. Transmission lines (16 to 24 inches in diameter) transport large quantities of water from one area to another. Major transmission lines are located in parts of Victoria Avenue, Sterling Avenue, Del Rosa Drive, Tippecanoe Avenue, Church Street, Weaver Street, 9th Street, Base Line, Pacific Street, Highland Avenue, and 5th Street. Distribution lines (3/4 inch to 20 inches in diameter) deliver water to individual dwelling units. Major streets have the larger distribution lines whereas secondary or local streets have progressively smaller lines.

The 2019 Water System Master Plan provides guidance for the expansion of the current water system based on planned development. Potential infill growth resulting from new zoning and land use regulations would be accounted for in future Water System Master Plan updates. Additionally, the 2019 Water System Master Plan evaluates the existing distribution system and its facilities to size future improvements. A water supply analysis was performed to determine whether available water sources are sufficient to meet water demand for the East Valley Water District under normal and emergency operations. It was determined that East Valley Water District will have a total deficiency of approximately 18.0 mgd of storage capacity and 13.44 mgd for supply under the build-out demand. Improvement projects identified would address system deficiencies and increased water demands.



# Appendix D: Affirmatively Furthering Fair Housing Analysis

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# 1. Introduction

Fair housing occurs when individuals of similar income levels have the same range of housing choice available to them in the same housing market regardless of their characteristics as protected under local, State, and Federal laws. It is important to the City of Highland (City) that its citizens have fair housing choice, free from discrimination on the basis of race/ethnicity, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act, California Government Code Section 65008, and other State and Federal fair housing and planning laws. In 2018, Assembly Bill 686 – Affirmatively Further Fair Housing, amended Sections 65583 and 65582.2 of the California Government Code to require a public agency to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing.

From freeway expansion to discriminatory housing loan practices, historically underserved communities across the nation have experienced decades of housing disinvestment and infrastructure underinvestment. Many racially and ethnically segregated communities have been left with higher rates of air pollution, poverty, unemployment, educational attainment, and health risks. State and Federal laws, such as the Fair Housing Act, have established pathways for local jurisdictions to create more diverse and equitable communities, but reversing decades of discriminatory policies at all levels of the public and private sector is complex, and many challenges to equitable development remain. The Housing Element seeks to affirmatively further fair housing by identifying segregated living patterns and barriers to fair housing, designating sites for affordable housing in areas of opportunity and implementing programs that aim to replace segregated living patterns and transform racially and ethnically concentrated areas of poverty. Siting lower-income housing in high resource areas is only part of the solution to improve fair housing, cities must also plan for the needs of lower-income individuals and households, through methods such as accessibility of jobs, transportation, educational opportunities, and health services.

This section serves as an assessment of fair housing practices pursuant to California Government Code Section 65583(c)(9) in the City. Housing Elements are required to include the following:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and outreach capacity;
- An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk;
- An assessment of the factors that contribute to the fair housing issues identified in the analysis;
- An identification of the jurisdiction’s fair housing priorities and goals, giving highest priority to the greatest contributing factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance; and
- Measurable strategies and actions to implement the fair housing priorities and goals in the form of programs to affirmatively further fair housing.

## 2. Analysis of Impediments to Fair Housing Choice

The City intends to affirmatively further fair housing choice and promote equal housing opportunity, in accordance with requirements in State Fair Housing and Housing Element law and Federal law. To achieve this, the City identifies impediments to fair housing choice and works to remove these impediments through this Affirmatively Furthering Fair Housing Analysis. In addition, in March 2015, San Bernardino County adopted the County of San Bernardino Analysis of Impediments to Fair Housing Choice (AI).

The Analysis of Impediments (AI) presents a demographic profile of the region, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. The AI also analyzes the conditions in the private market and the public sector that could limit the range of housing choices or impede a person's access to housing.

## 3. Housing Element Outreach

While outreach and community engagement have always been important, in recent years significant strides have been made in technology and level of effort regarding engagement. Past engagement may not always have had multiple forms of media, meaning that in-person public meetings were the primary form of engagement, with surveys and stakeholder interviews and other types of engagement taking a back seat. In-person public meetings are not always the most accessible for multiple reasons. If a meeting is at only one specific time, or if it is only offered in English, it can create participation barriers for those that may be unable to attend at the specified time or location, or people without proficiency in English.

Engagement related to the Housing Element has attempted to be comprehensive while in the context of the COVID-19 pandemic. An online survey was used to engage residents on local housing needs and concerns. Stakeholder interviews were conducted via telephone, where public meeting participants were invited to share their thoughts in a one-on-one setting. Results of the interviews provided a better understanding of housing needs, priorities, opportunities, and constraints. All virtual meetings were held in English and Spanish to foster participation across demographics, as 34.7 percent of the population is Spanish Speaking. Virtual meetings were open to the public and were recorded and made available for public viewing after the event as well. Because the virtual meetings were conducted to allow participants to practice social distancing, participants had the option of joining through their computers, tablets, or using a call-in number if they did not have access to internet. Virtual meetings were also streamed onto Facebook, which allowed for post-meeting comments to be submitted. In addition, the outreach was held in the evenings, outside of working hours. An extensive outreach process contributes to a set of meaningful goals, policies, and programs that will reflect the City's housing needs and the priorities and needs of all of those in the City, including those with special needs and lower income populations.

Please refer to **Appendix F, Community Engagement Summary and Results**, for a full summary of outreach material and outreach conducted as part of the Housing Element update.

## 4. Assessment of Fair Housing

### 4.1. Fair Housing Enforcement and Outreach Capacity

This section discusses the fair housing services available to residents in the City of Highland and the corresponding organizations that provide fair housing services available to both providers and consumers of housing, as well as the nature and extent of fair housing complaints received by the fair housing provider. In general, fair housing services include investigating and resolving housing discrimination complaints; discrimination auditing and testing; and education and outreach, such as disseminating fair housing information through written materials, workshops and seminars.

The City of Highland coordinates with the Inland Fair Housing and Mediation Board (IFHMB's) to provide fair housing services for its residents. Fair housing is providing information, investigation, education, conciliation, and/or referral of housing discrimination complaints FREE of charge to individuals. It also involves fair housing workshops that offered year-round to educate housing providers, tenants, homeowners, and financial and lending institutions on the key aspects of fair housing laws.

According to the California Department of Employment and Fair Housing (CDEFH), between the calendar years of 2013 and 2021, there were a total of three housing cases in Highland. One of these was filed based on discrimination to national origin. Sex orientation, disability, race, familial status, religion, and color had zero housing cases filed in the City.

Additional organizations that offer fair housing services and are available to the residents of Highland include:

- U.S. Department of Housing and Urban Development (HUD)
- California Department of Fair Employment and Housing (DFEH)
- Housing Authority of San Bernardino County

### 4.2. Segregation and Integration

Patterns of segregation have been commonly linked to poorer life outcomes in income, housing equity, educational attainment, and life expectancy, according to research from the University of California, Berkeley (UC Berkeley)<sup>1</sup>. Affirmatively furthering fair housing involves overcoming patterns of segregation that foster inclusive communities.

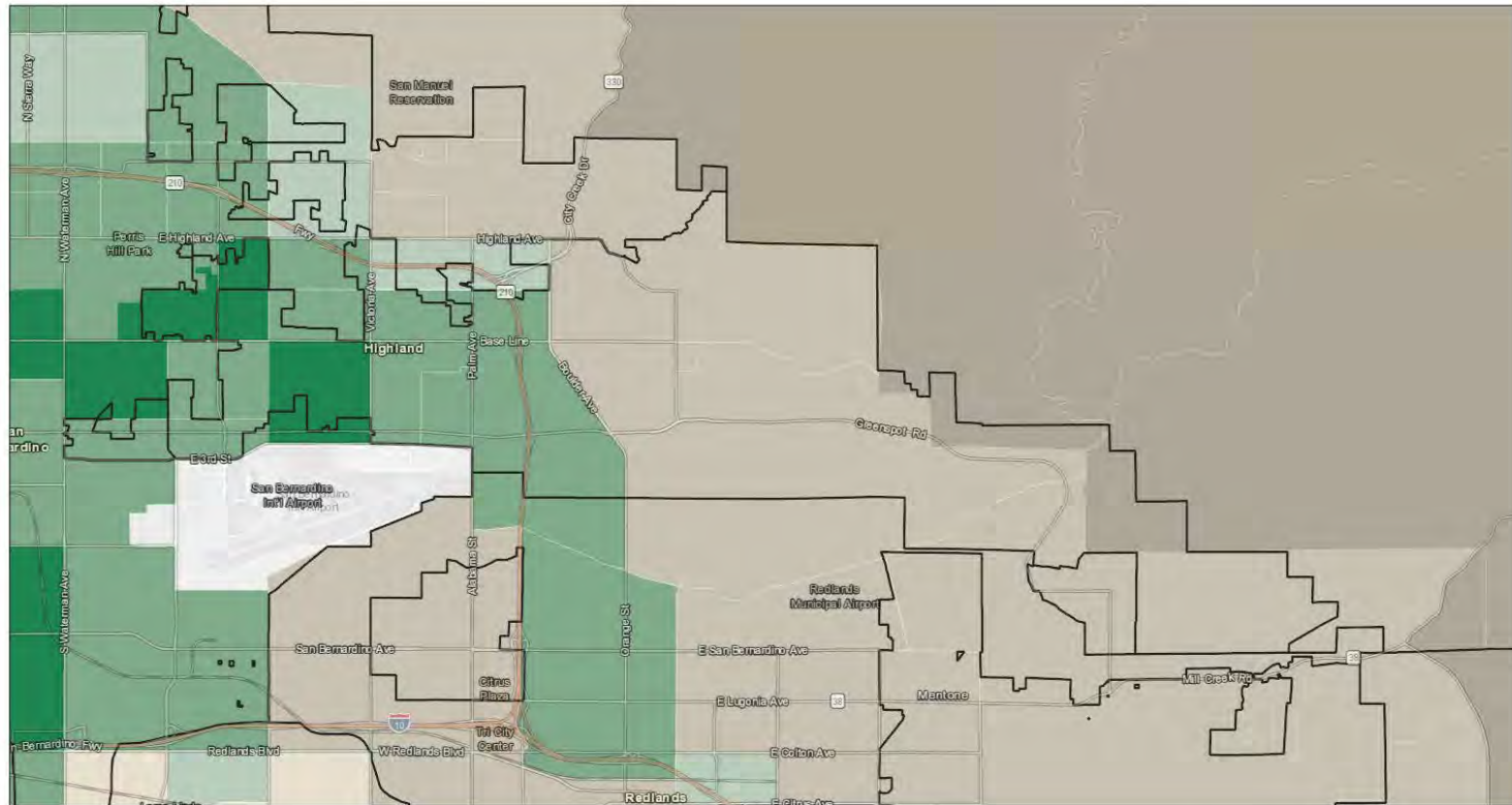
#### 4.2.1. Race and Ethnicity

Like much of Southern California, Highland is becoming more racially and ethnically diverse. The population of Highland is primarily White and/or Hispanic. As of 2018, Highland residents who reported being White were the majority. Non-Hispanic White residents made up 41.7% of Highland's population in 2000, and only made up 27.6% of the population in 2018. In regard to ethnicity, the number of Hispanic residents of any race increased significantly from 2000 to 2018, going from 36.6% of the population to now more than half the population. Residents of African American/Black or Asian race do

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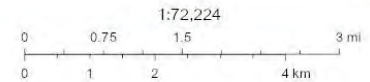
<sup>1</sup> S. Menedian, S. Gambhir. "Racial Segregation in the San Francisco Bay Area," *Othering & Belonging Institute, UC BERKLEY, 2018*, <https://belonging.berkeley.edu/study-finds-strong-correlations-between-segregation-and-life-outcomes-sf-bay-area>.

not make up the majority of the population in any of the City's census tracts, however there are over 4,000 African American/Black residents and Asian residents each within the City. From 2000 to 2018, the Non-Hispanic African American/Black population has reduced from 11.7% of the population to 8.1%. The Non-Hispanic Asian population has increased from 5.9% in 2000 to 9% in 2018. These changes could be attributed to several factors including migration and childbearing, and trends can be complicated to discern when considering many individuals can be multiple races, and ethnicity is not exclusive of race. As shown in **Figure 1, Race and Ethnic Distribution**, the proportion of the Hispanic population in Highland is primarily in western Highland. The Non-Hispanic White population is primarily in eastern Highland, with Boulder Avenue as the boundary distinguishing the eastern and western portions of Highland. The Hispanic majority in eastern Highland is sizeable or predominant for most of western Highland, whereas the White majority in eastern Highland is slimmer compared to the next predominant population.



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- City/Town Boundaries
- (R) Predominant Population - White Majority Tracts
  - Slim (gap < 10%)
  - Sizeable (gap 10% - 50%)
  - Predominant (gap > 50%)
- (R) Predominant Population - Hispanic Majority Tracts
  - Slim (gap < 10%)
  - Sizeable (gap 10% - 50%)
  - Predominant (gap > 50%)



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**Figure 1. Race and Ethnic Distribution<sup>2</sup>**

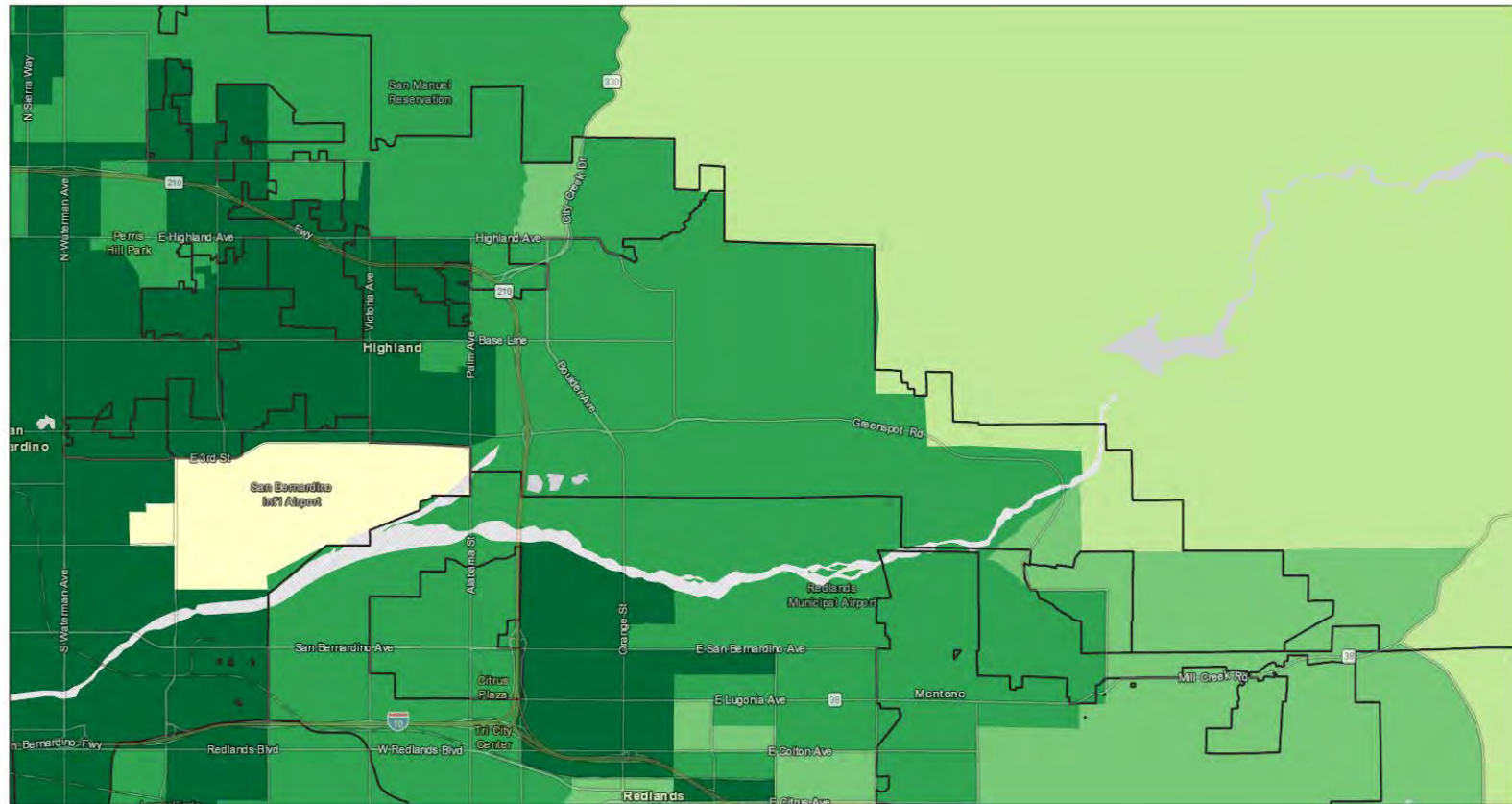
<sup>2</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

Generally, the average racial composition and number of people of different races or ethnicities in neighborhoods differs depending on location. To further examine this distribution, this assessment relies on a calculation of the average racial composition of neighborhoods experienced by members of each racial group. These are sometimes referred to as "exposure indices". This is because they show the exposure a given race group experiences with members of their own and other races (as a percentage of 100) in an average neighborhood of the city (or metropolitan area) being examined. In the City of Highland, Hispanic residents are exposed to 42.7% Hispanic residents, and 35% White residents. On the other hand, White residents are exposed to 30.7% Hispanic residents and 48.9% White residents.<sup>3</sup> This shows that White residents are more likely to be exposed to other White residents, and Hispanic residents are more likely to be exposed to other Hispanic residents. This is true to varying degrees for all races and ethnicities examined in Highland. **Figure 2, Diversity Index**, displays the levels of diversity across the different neighborhoods within the City. Higher diversity is seen in the predominant Hispanic resident western core, whereas lower diversity is seen in eastern Highland. From 2010 to 2018 the diversity of neighborhoods in Highland improved slightly across the City.

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<sup>3</sup> Frey, W. H., & Myers, D. (n.d.). Segregation: Neighborhood Exposure by Race. CensusScope. [https://www.censusscope.org/us/s6/p36448/chart\\_exposure.html](https://www.censusscope.org/us/s6/p36448/chart_exposure.html).



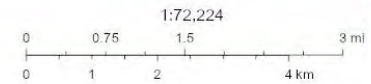


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- City/Town Boundaries
- (A) Diversity Index (2018) - Block Group
  - Lower Diversity
  - Higher Diversity

- 55 - 70
- 70 - 85

40 - 55



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**Figure 2. Diversity Index<sup>4</sup>**

<sup>4</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



Another measure of segregation between two groups is the dissimilarity index (DI). The DI measures the degree to which two specific groups are distributed across a geographic area. The DI varies between 0 and 100 and measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group. A dissimilarity index of 0 indicates conditions of total integration under which both groups are distributed in the same proportions across all neighborhoods. A dissimilarity index of 100 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group. This is a helpful metric because it can show which race or ethnicity is the most segregated. Generally, the City of Highland is moderately segregated. Highland received an index rating of 36.2 when comparing White and Hispanic populations, indicating that roughly 36.2% of Hispanic households are not distributed the same way as White households in the City. When comparing White and African American/Black populations, Highland has a similar score of 33.8. And when comparing White and Asian populations, Highland has a lower score of 18.4. Since the other ethnic/racial groups within the City have a small population percentage, the DI may be high even if the group is evenly distributed throughout the area. Thus, this assessment only compares White, Hispanic, African American, and Asian populations.<sup>5</sup>

#### 4.2.2. National-Origin

The proportion of foreign-born population is consistent with the County at 21 percent.<sup>6</sup> Those born in Latin America make up 70 percent of the foreign-born population in Highland and the second largest subset are those born in Asia at 25 percent of the foreign-born population. This is a significant portion of the population and should be given consideration for fair housing outreach and education.

#### 4.2.3. Language

In Highland and across the region, approximately 42 percent residents speak languages other than English at home.<sup>7</sup> Individuals who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English have Limited English Proficiency (LEP). Language barriers can increase the discrimination that immigrant populations may face in access to housing. Generally, immigrants with limited resources often face difficulty in acquiring adequate housing as they adjust to their new surroundings and obtain employment. As a result, housing problems such as overcrowding and overpayment are often more prevalent among those populations that recently immigrated.

#### 4.2.4. Household Income

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities, although economic factors that affect a household's housing choice are not necessarily a fair housing issue. Fair housing issues occur when relationships among household income, household type, race/ethnicity and other factors create misconceptions, biases, and differential treatments. Discriminatory housing practices of the past such as redlining, restrictive zoning,

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<sup>5</sup> Frey, W. H., & Myers, D. (n.d.). Segregation: Dissimilarity Indices. CensusScope. [https://www.censuscope.org/us/s6/p33588/chart\\_dissimilarity.html](https://www.censuscope.org/us/s6/p33588/chart_dissimilarity.html)

<sup>6</sup> US Census Bureau. 2019. Demographic Trends. ACS 2014-2019.

<sup>7</sup> US Census Bureau. 2019. Demographic Trends. ACS 2014-2019.

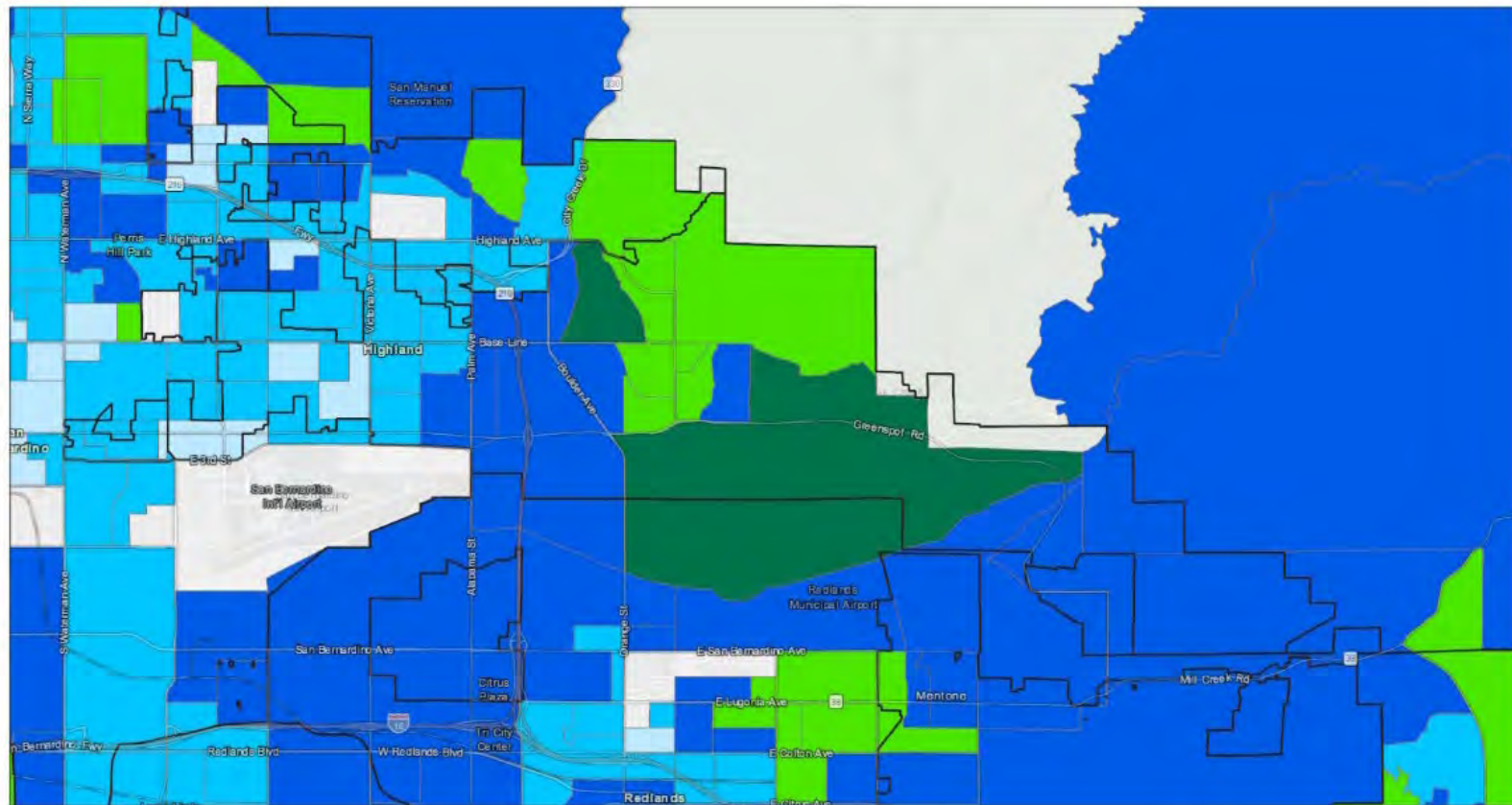
urban renewal, and steering, while illegal today, have led to a disproportionate gap in household wealth based on race and ethnicity.

Within the City of Highland in 2019, the “Asian Alone” group had the highest poverty rate of any race or ethnicity at 22.6%. The Hispanic population has the next highest poverty rate for a racial or ethnic group in Highland at 21.8%. 17.9% of the “Black, non-Hispanic” population in Highland were below the poverty level in 2019. The “White, non-Hispanic” population was far more fortunate, with only 9% of residents below the poverty level for 2019.<sup>8</sup>

Household income in the City of Highland is displayed on **Figures 3 through 5**, below. **Figure 3, Median Income**, shows that the lowest median income in Highland is found in the western core. All communities east of Palm Avenue have median household incomes at or above the state average of \$87,100. Much of the same western area has over 30% of residents in poverty, as can be seen on **Figure 4, Poverty Status**. The farthest southwest portion of Highland has over 40% of residents in poverty. Areas to the east of this concentration of poverty have the next lowest incomes and percentages of people in poverty. **Figure 5, Low to Moderate Income**, displays the percent of the population with low or moderate income, furthering the points made within this section.

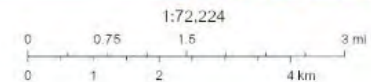
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<sup>8</sup> US Census Bureau. 2019. Poverty Status in the Past 12 Months. 2019 ACS 5-Year Estimates.



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- City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000

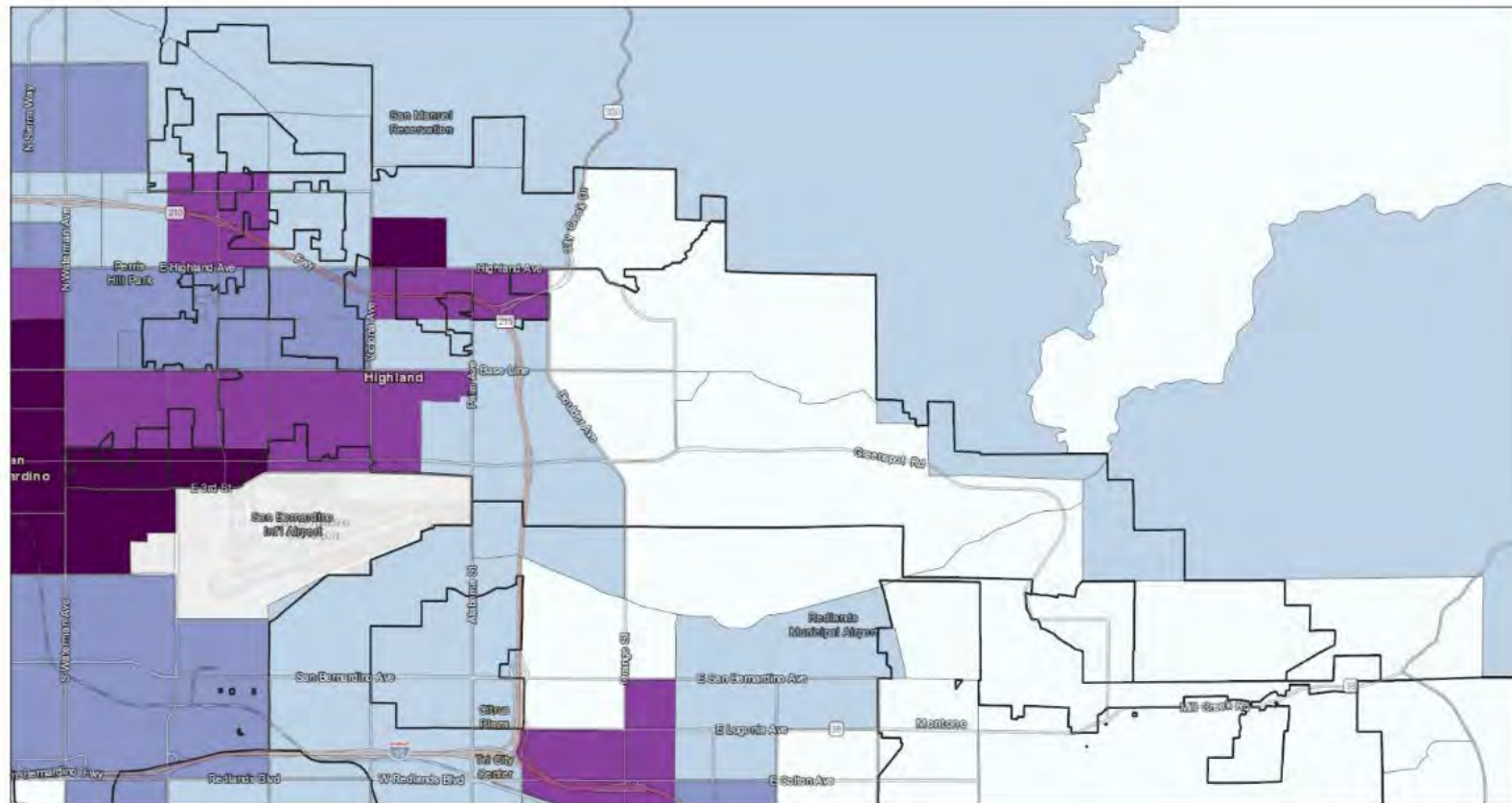


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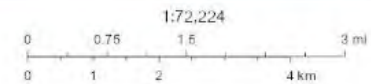
**Figure 3. Median Income<sup>9</sup>**

<sup>9</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



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- City/Town Boundaries
- (R) Poverty Status (ACS, 2015 - 2019) - Tract
  - < 10%
  - 10% - 20%
  - 20% - 30%
  - 30% - 40%
  - > 40%



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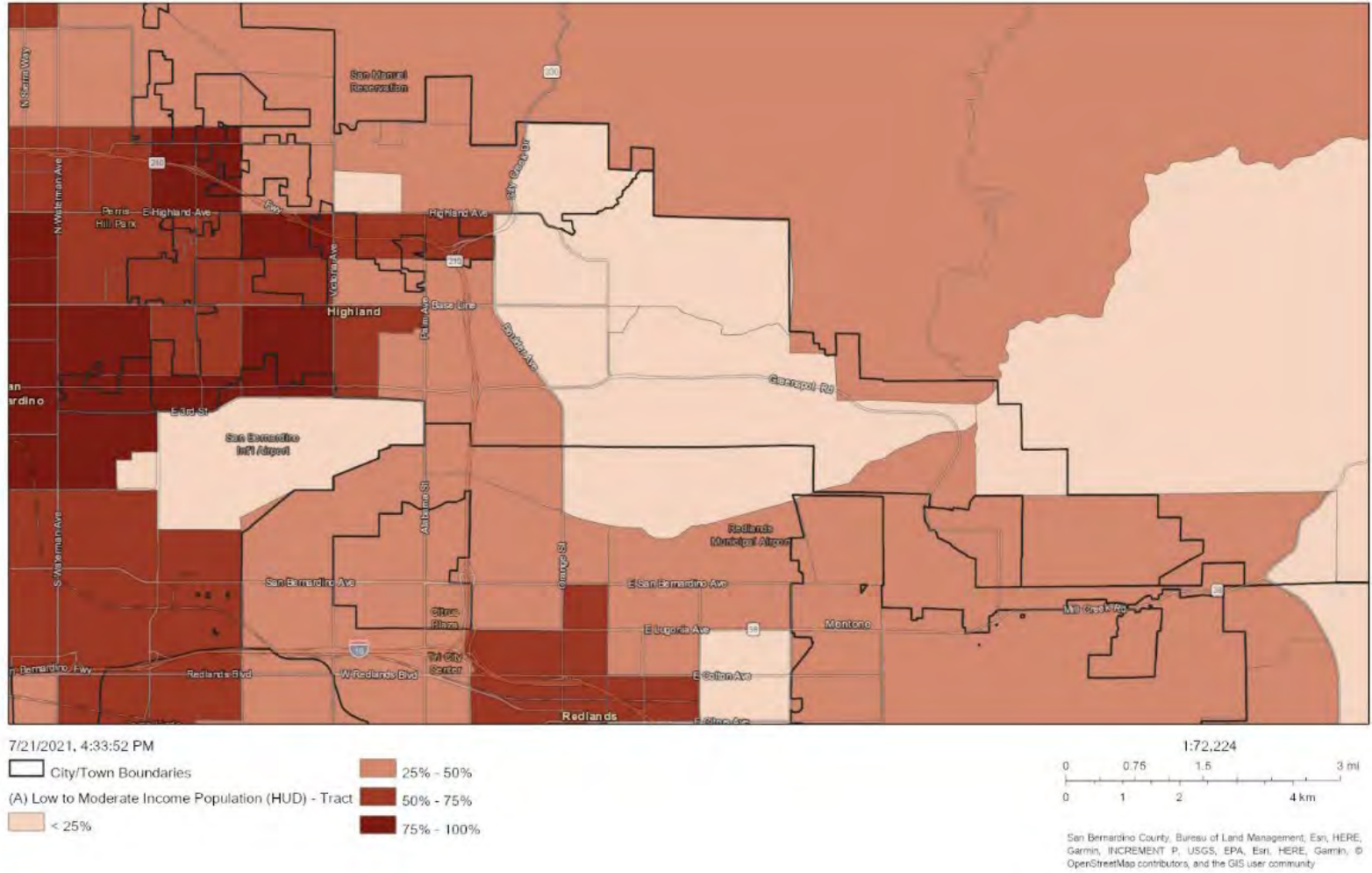
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**Figure 4. Poverty Status<sup>10</sup>**

<sup>10</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.





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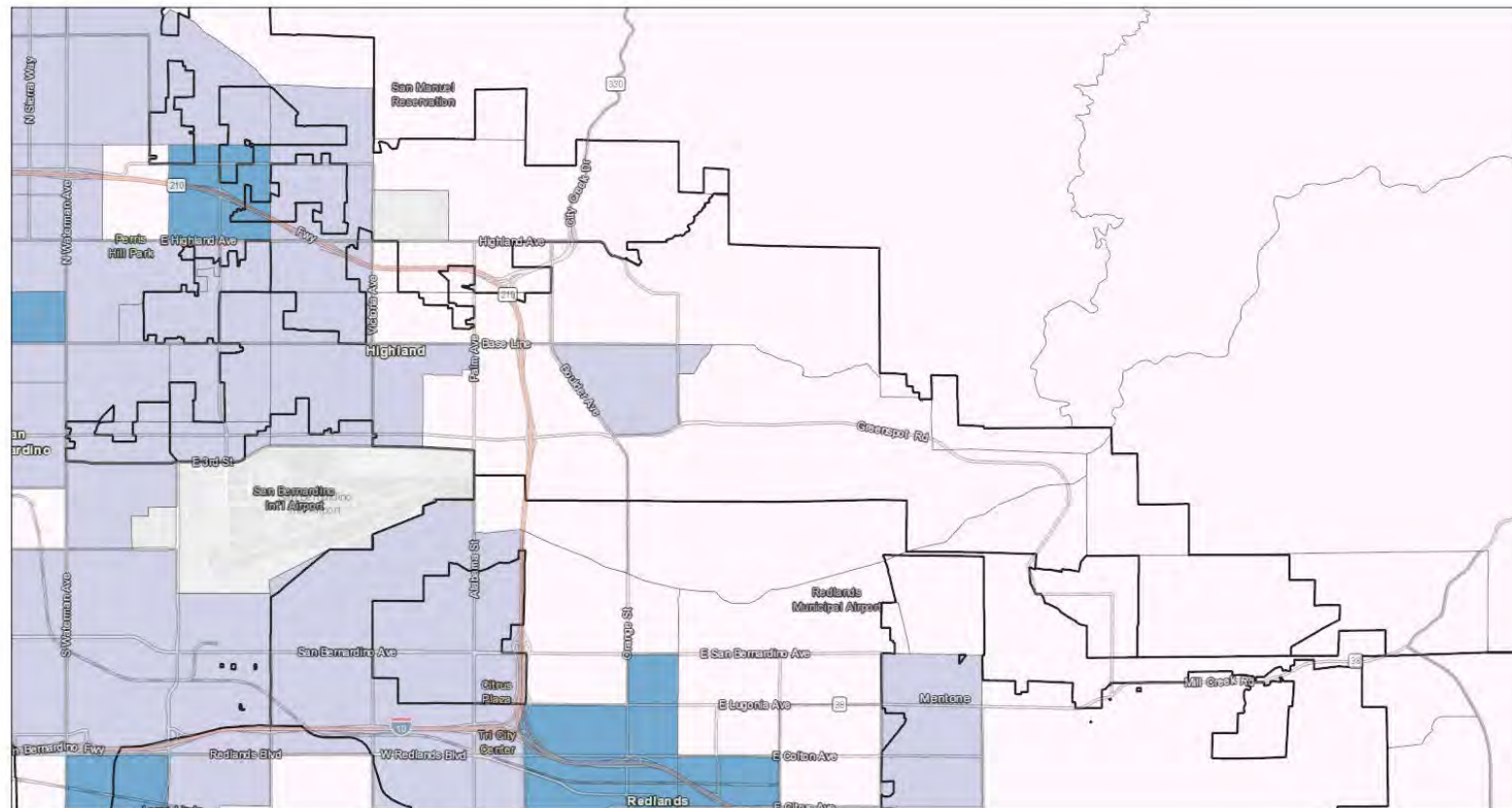
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Figure 5. Low to Moderate Income<sup>11</sup>

<sup>11</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

#### 4.2.5. Familial Status

Family structure is something that impacts the care of children, type of housing needed, financial needs and more. Single-parent households require more time to take care of children than married or cohabitating couples, which can impact the jobs available to parents, income levels, and the amount of support afforded to children. Family structure is something that has evolved over time in the US, with fewer couples marrying, and cohabitation occurring more often. Families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords or property owners may charge larger households a higher rent or security deposit. According to the ACS 2014-2019, there were 4,209 family households with married-couples and 2,410 single-parent households in Highland. **Figure 6, Children in Single-Mother Headed Households**, shows that single-mother headed households are more prevalent in the westernmost portions of Highland. **Figure 7, Children in Married Couple Households**, shows that the farthest southeast portion of Highland has the highest proportion of children in married couple households. Needs of single-parent households include affordable housing and proximity to schools, childcare centers, transportation, recreation, employment and other opportunities.



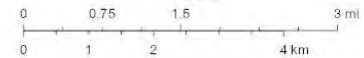
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City/Town Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

- ≤ 20%
- 20% - 40%
- 40% - 60%

1:72,224



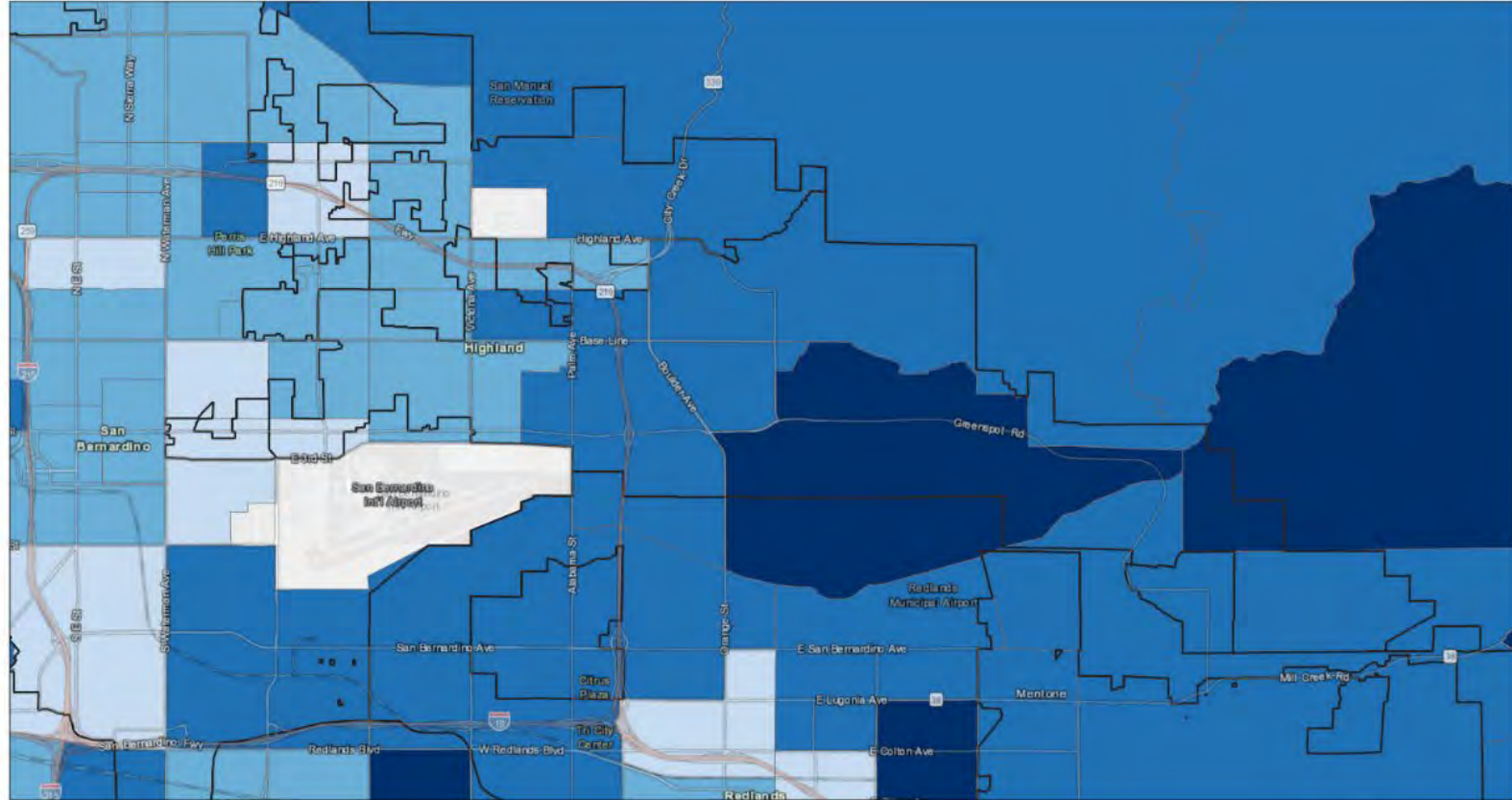
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**Figure 6. Children in Single-Mother Headed Households<sup>12</sup>**

<sup>12</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



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City/Town Boundaries

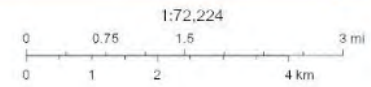
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

20% - 40%

40% - 60%

60% - 80%

> 80%



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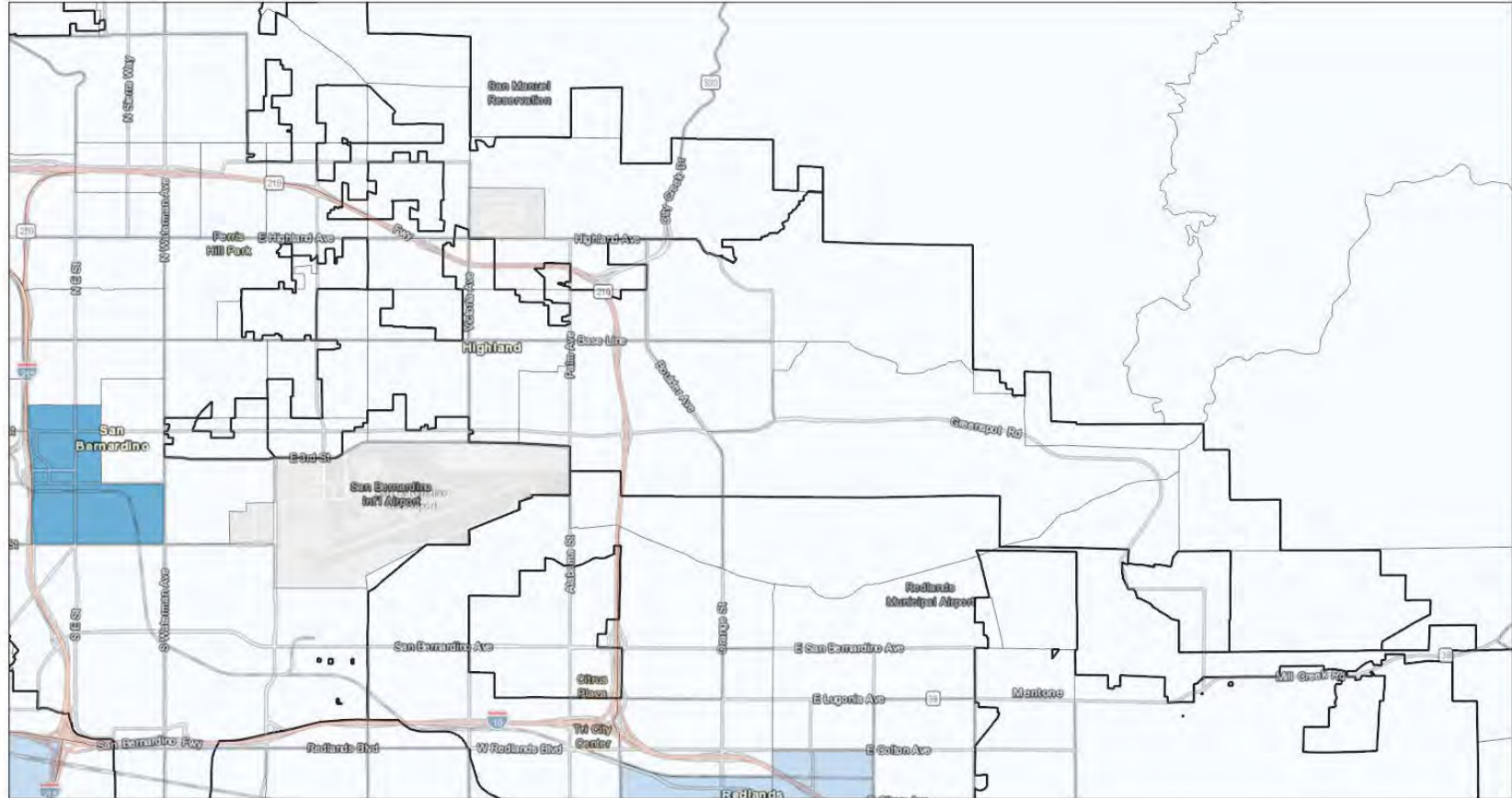
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**Figure 7. Children in Married Couple Households<sup>13</sup>**

<sup>13</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



The household living structure of adults also can be examined for potential fair housing issues. Housing is much more affordable when costs and responsibilities are shared with a spouse. Areas with high rates of adults living alone can cause people to pursue the most affordable living situation possible, which can lead to overcrowded living situations or substandard housing. **Figure 8, Adults Living Alone**, shows that there are not many adults in Highland that live alone. **Figure 9, Adults Living with a Spouse**, displays the lowest rates of adults living with a spouse was in western Highland. The highest rates of adults living with a spouse are in northern Highland.

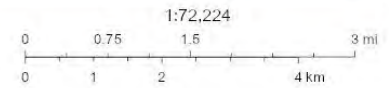


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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

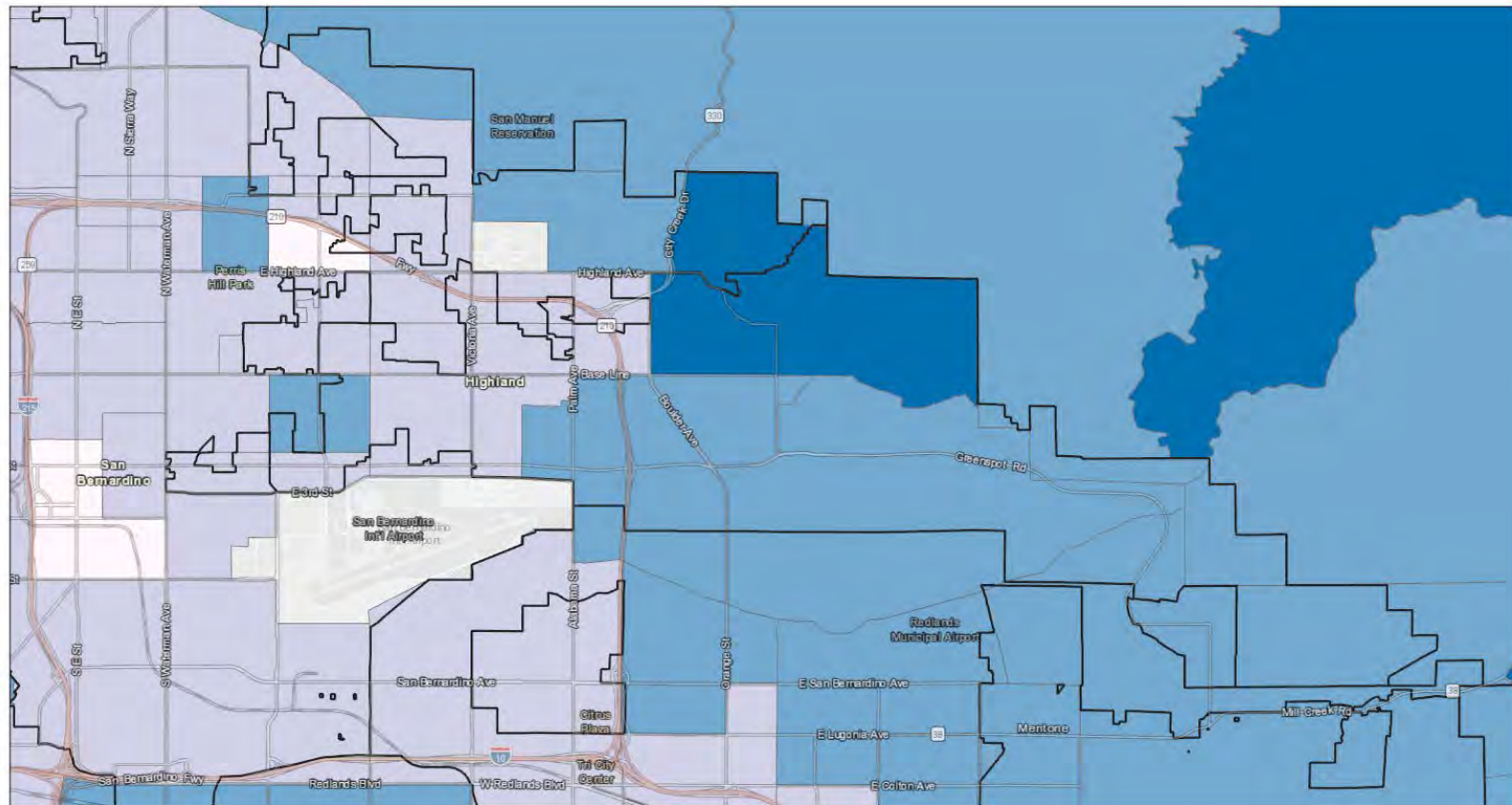
- < 20%
- 20% - 40%
- 40% - 60%



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**Figure 8. Adults Living Alone<sup>14</sup>**

<sup>14</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



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City/Town Boundaries

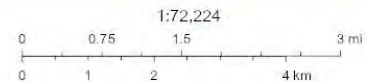
(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

< 20%

20% - 40%

40% - 60%

60% - 80%



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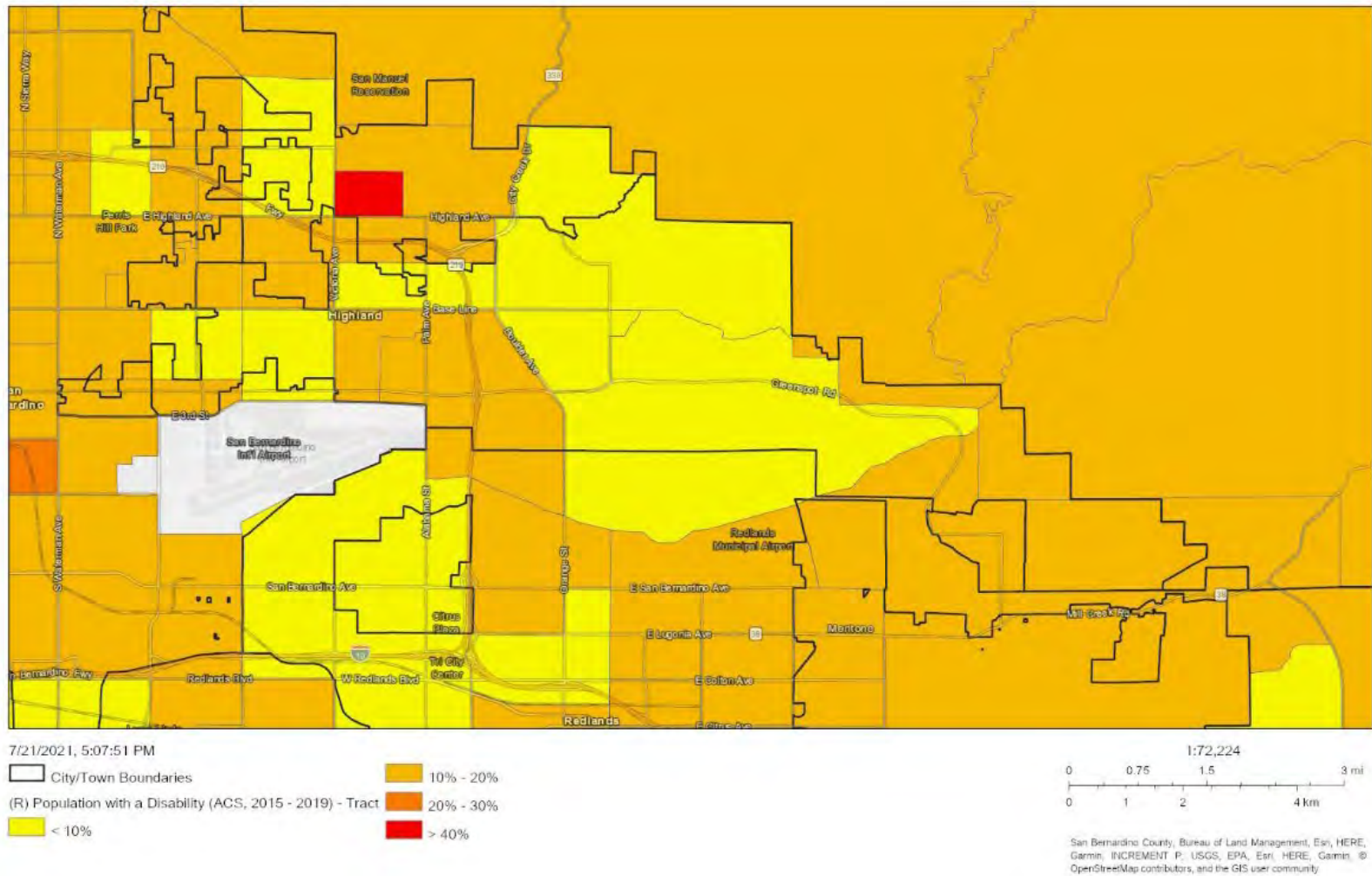
**Figure 9. Adults Living with a Spouse<sup>15</sup>**

<sup>15</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

#### 4.2.6. Persons with Disabilities

Fair housing choice for persons with disabilities can be compromised based on the nature of a person's disability. Persons with physical disabilities may face discrimination in the housing market because of the need for wheelchairs, home modifications to improve accessibility, or other forms of physical assistance. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords or property owners might refuse to rent to tenants with a history of mental illness. Further, neighbors may object when a house becomes a group home for persons with mental disabilities.

According to population disability data available through ACS 2014-2019, 6.5 percent of the population in Highland under 65 years of age have some type of disability. In general, many persons with disabilities have lower incomes since the disability often affects their ability to choose from a range of employment opportunities. Thus, persons with disabilities often have a greater need for affordable housing, as well as supportive services. Persons with disabilities are relatively evenly spread throughout Highland, with higher concentrations falling within tracts outside of the central core, as seen on **Figure 10, Population with a Disability**.



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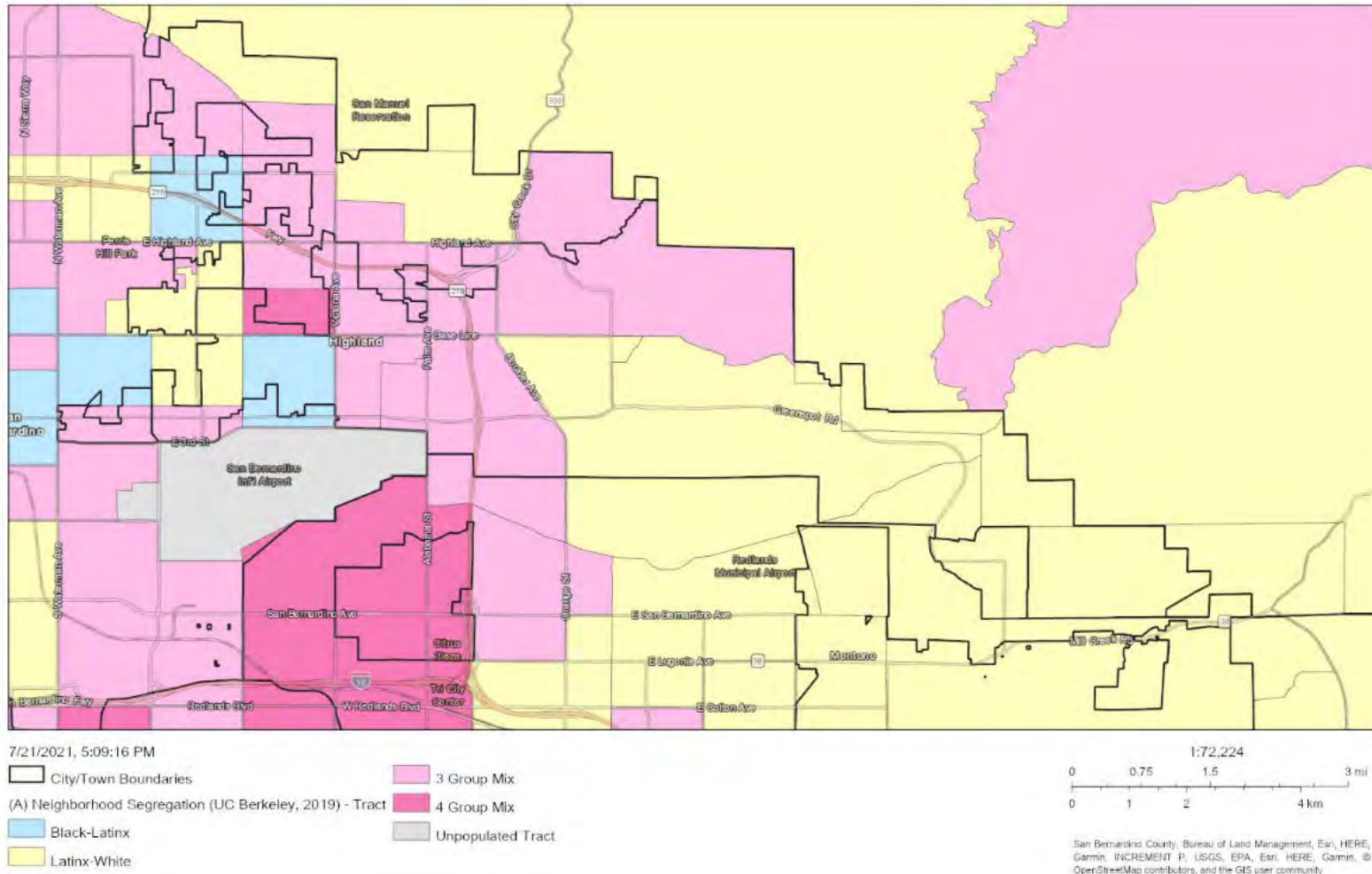
**Figure 10. Population with a Disability<sup>16</sup>**

<sup>16</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



#### 4.2.7. Neighborhood Segregation

As previously mentioned, residents in highly segregated neighborhoods often experience poorer life outcomes. The typologies in **Figure 11, Neighborhood Segregation**, identify which race/ethnicity populations have more than 10 percent representation within the given tract. **Figure 11** demonstrates a relatively diverse mix of ethnic/racial groups within a given tract. The City is primarily “Latinx-White” in the east and “3 Group Mix” in the west. Both figures identify a concentration of Non-White groups in the western portion of the City. The more diverse areas are also associated with a higher concentration of renters and poverty status.



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**Figure 11: Neighborhood Segregation<sup>17</sup>**

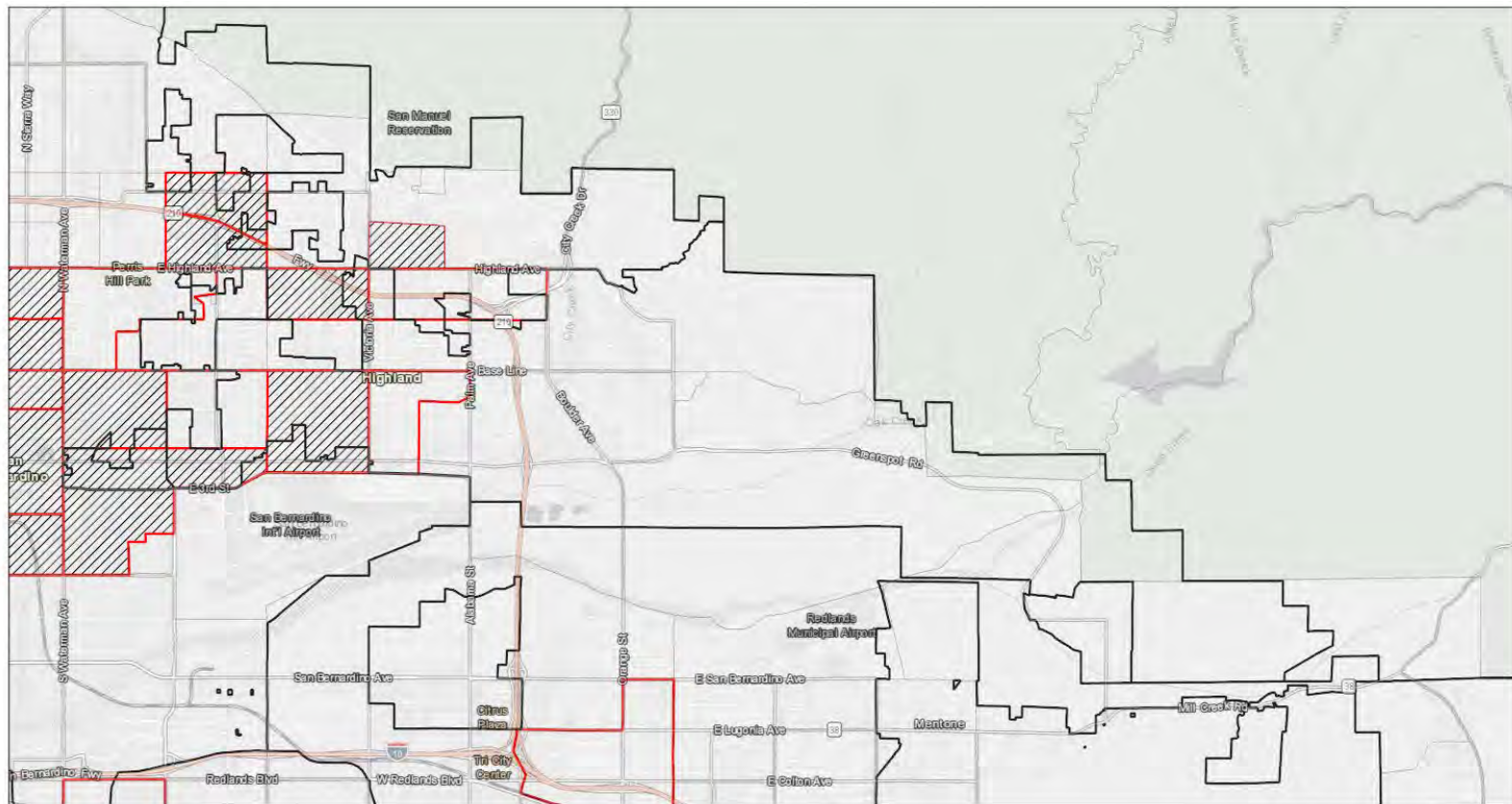
<sup>17</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

### 4.3. Racially and Ethnically Concentrated Areas of Poverty

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) are neighborhoods with concentrations of both poverty and singular races or ethnicities. These are generally census tracts with a majority of non-white residents and a poverty rate of 40 percent and higher or three times the average tract poverty rate for the county. In addition to highlighting historic discrimination, R/ECAPs also have lower economic opportunity in the present day. **Figure 12, R/ECAP and Segregation and Poverty**, shows the three census tracts considered R/ECAPs in the City of Highland, concentrated in areas near the City of San Bernardino to the west. The farthest west R/ECAP tract is tract 65, the middle R/ECAP tract is tract 74.07, and the upper R/ECAP tract is tract 76.01. These are also near areas of high segregation and poverty identified by the California Tax Credit Allocation Committee. This is consistent with the concentration of R/ECAP parcels in the City of Highland that are near the City of San Bernardino.

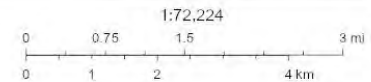
These R/ECAPs contain approximately 17.4% of Highland's population, which amounts to about 9,500 people. Two of the three R/ECAPs are primarily residential areas, while the farthest west of the three is more of a mix between commercial and residential. According to 2019 census data, each of the three R/ECAPs contain more than 10 percent above the rate of the Hispanic population for the overall City. Additionally, the central R/ECAP tract has more than double the proportion of African American/Black residents than the City overall. All three R/ECAP tracts have significantly higher levels of poverty than the City's total, with the farthest west R/ECAP having the highest poverty rate at 48.7% of the population. The west and middle R/ECAPs have nearly three times as many renters as homeowners, and the northernmost R/ECAP is consists of approximately half renters and half homeowners.





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- City/Town Boundaries
- (R) TCAC Area of High Segregation and Poverty (2021) - Tract
- (R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAP'S" (HUD, 2009 - 2013) - Tract
- 0 - Not a R/ECAP
- 1 - R/ECAP



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**Figure 12. R/ECAP and Segregation and Poverty**<sup>18</sup>

<sup>18</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

### 4.3.1. Racial Concentrations in Areas of Affluence

In addition to an analysis of R/ECAPs, this AFFH considers Racially Concentrated Areas of Affluence (RCAA). Scholars at the University of Minnesota Humphrey School of Public Affairs have created the (RCAAs) metric to tell the story of segregation in the United States more fully. Based on their research, RCAAs are defined as census tracts where:

- 80 percent or more of the population is white, and
- the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016).

While this is a useful measure nationwide, HCD has adjusted the RCAA methodology to better reflect California’s relative diversity. HCD’s RCAA data is not yet available, however Figures 1 and 3 above provide a preliminary analysis which display the areas where the white population exceeds 50 percent of the population and where the median household income is \$125,000 or greater. The tracts with the highest proportion of the white population include Census Tract 060710111.01 and 060710115.00, which overlap within Highland but are primarily located outside of the City’s boundary. The block groups where the median income exceeds \$125,000 include Block Group 2, Tract 79.01 and Block Group 3, Tract 79.04.

## 4.4. Patterns Over Time

Historically in the United States, housing discrimination (both explicit and covert) has occurred through land use policy and zoning, mortgage lending practices, landlord or property owner decisions on rental applications, and patterns of public and private investment and disinvestment. These trends have resulted in residential segregation based on race, ethnicity, income, disability, and other characteristics, and has limited housing choices and access to opportunities for many Americans – especially for communities of color.

Significant historical events in Highland which influenced early land use patterns include the forced relocation of the San Manuel Band of Mission Indians to a reservation in 1891 followed by settlements along Base Line and Palm Avenue then Palm Avenue and Pacific Street during westward expansion. The growth of the citrus industry in the early and mid-1900s gave rise to large farms and packing houses throughout the City.

In 1942, Norton Air Force Base began operation and the surrounding Highland neighborhoods experienced significant development of small and mid-sized tract homes with corresponding commercial development along Base Line and other east-west corridors.

In the 1980s, developer Mobile Oil, purchased approximately 1,800 acres in the eastern portion of the City and received approval from the County of San Bernardino to construct a new community with multiple housing types, common areas and amenities. The establishment of this “new community” is the defining event that led to perceived split in the City between east/west, new/old, and more/less affluent. The construction of the 210 Foothill Freeway exacerbated this perception along with the division of school districts along similar boundaries.

The City of Highland incorporated in 1987 and derived its early land-use policy from the County of San Bernardino. In 1991, The City of Highland formed a Redevelopment Agency that identified a target area

of lower income neighborhoods, vacant and underutilized land, and areas in need of basic infrastructure. The Redevelopment Agency adopted goals and policies to, “increase, improve and preserve the quality of low/moderate income housing throughout the project areas and the City.” Housing needs goals included securing long-term affordability covenants, creating rehabilitation programs for rental units and single-family homes, providing a down payment assistance program, working with the County of San Bernardino Department of Housing, identify funding programs, and housing needs, as well as inclusionary and replacement housing. The Agency was successful in many of its endeavors, including the construction of 184 low-income apartment units, rehabilitation of several hundred single-family homes, a new 17-acre park, community center, library, police station, and miles of infrastructure almost wholly on the west side of the City. The Redevelopment Agency was dissolved by the State of California in 2012.

During the 4<sup>th</sup> and 5<sup>th</sup> Cycle Housing Elements, the City rezoned numerous properties to permit medium- and high-density housing by right and rezoned properties mid-block along Base Line from commercial to residential. Properties in the vicinity of the 210 Freeway, with excellent access to bus lines were rezoned Mixed Use to allow a variety of housing types in conjunction with a new pharmacy, grocery store, retail and restaurant. The City has engaged several affordable housing developers to construct a lower income, senior housing project on Housing Authority property on Central Avenue, south of Base Line.

Public participation is of the utmost importance as the City continues to modify and improve its housing policy. The City follows all public noticing policy, has a newly updated website, social media accounts on several platforms, and easily accessible staff. Public outreach has occurred at the City’s Community Center, Library, City Hall, Chamber of Commerce events, and remotely via computer applications.

#### 4.4.1. Mortgage Loan Access

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. Lending policies and requirements related to credit history, current credit rating, employment history and the general character of applicants permit lenders to use a great deal of discretion and in the process deny loans even though the prospective borrower would have been an acceptable risk. Despite the illegality of discriminatory practices in the housing credit system, patterns of inequality still exist.

Discriminatory practices in home mortgage lending have evolved in the past five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, ethnic minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. During the recent rise of the subprime loan market,<sup>19</sup> discriminatory lending practices became more subtle. By employing high pressure sales practices and deceptive tactics, some mortgage brokers pushed minority borrowers into high-cost subprime mortgages that were not well suited to their needs and led to financial problems.

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<sup>19</sup>TD Bank Corp. (2007, April 30). *A Primer on the U.S. Sub-Prime Market*. The subprime mortgage market ballooned in 2005 and 2006 to 20 percent–25 percent of all new mortgages, capturing more than twice the market share seen over the prior 10 years.

### *Conventional and Government-Backed Financing*

According to the Federal Financial Institutions Examination Council (FFIEC) data for 2016, approximately 48,209 households (for a total of \$13,388,132) applied for conventional loans in the Metropolitan Statistical Area of (MSA) of RIVERSIDE-SAN BERNARDINO-ONTARIO, CA. Among all applications received that year, 25,573 loans were originated, and 3469 were denied. Whites participated at the highest level, submitting 27,278 conventional loan applications. Hispanics, the second highest participants, provided the market with 12,921 loan applications. Even though Hispanics make up 50 percent of the populations within the MSA, they only accounted for 27 percent of all loan applications submitted. African Americans submitted just 296 applications in 2016, which was the lowest participation rate amongst the four largest populations. There was no significant variance in rate of denial amongst racial/ethnic groups.

According to the FFIEC data, approximately 35,874 households (for a total of \$9,823,136,000) applied for government-backed loans in the Metropolitan Statistical Area of (MSA) of RIVERSIDE-SAN BERNARDINO-ONTARIO, CA. Among all applications received in 2016, the number of loans originated was 25,573, and the number of percentage of applications denied was approximately 10 percent. When broken down by race and ethnicity, participation in the market varied. Whites once again had the highest participation levels, similar to conventional loans, submitting 27,278 government-backed loan applications, amounting to \$7,251,363,000. African Americans were the lowest participants in government-backed loans with only 296 applications submitted in 2016, for a total amounting to \$80,132,000. With all racial/ethnic groups denial rates being within 4 percent of each other as well as the MSA area as a whole, there was no significant variance in rate of denial.

### *Subprime Lending*

According to the Federal Reserve, *prime* mortgages are offered to persons with excellent credit and employment history and income adequate to support the loan amount. *Subprime* loans are loans to borrowers who have less-than-perfect credit history, poor employment history or other factors such as limited income. Subprime lenders generally have interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. Although subprime lending cannot in and of itself be equated with predatory lending, studies have shown a high incidence of predatory lending in the subprime market. The FFIEC data does not provide information on which loans were subprime loans. As such, analysis on this topic is difficult. It will be important to monitor lending institutions with high approval rates in Highland should any be discovered.

#### 4.4.2. Demographic Trends

The Needs Assessment, provided in **Appendix B – Community Profile**, provides additional data and analysis of the demographic patterns within the City. The effects of the previously discussed historical patterns over time can be seen through the current demographic makeup of the City.

#### 4.5. Disparities in Access to Opportunity

Neighborhoods with high access to opportunity are places that result in strong economic, environmental, health, and educational outcomes for residents. Lower-income households and racially segregated communities are more highly concentrated in distressed and disadvantaged areas with low access to opportunity where residents are disproportionately exposed to crime, environmental hazards,

and a lack of investment, resulting in poorer physical and mental health outcomes. Disadvantaged areas tend to have less access to quality employment opportunities, leaving lower-income households at a greater risk of remaining financially insecure.

When affordable housing is located in high-opportunity/high-resource areas, this increases access to resources such as quality schools, employment, transportation, low poverty exposure, and environmentally healthy neighborhoods. Research indicates that amongst various economic and social factors, being in proximity to certain amenities can encourage positive critical life outcomes.<sup>20</sup> When affordable housing is dispersed throughout new development in high resource residential areas, as opposed to being concentrated in existing areas of poverty, research consistently shows that residents of such affordable housing developments have increased quality of life, better access to opportunity and prosperity, and higher school performance. For example, a study by the Urban Institute’s Metropolitan Housing and Communities Center found that lower-income residents who reside in mixed-income communities report an increased sense of neighborhood safety, improved employment prospects; job readiness, and job promotions; better emotional, mental, and physical health; and significant improvements in children’s’ academic performance.

Federal and State agencies have shown an increased focus in promoting increased access in high opportunity areas. This trend is evident in the states’ allocation of Low-Income Housing Credit (LIHTC) dollars – the primary subsidy that is available for developing and preserving affordable housing. To allocate these credits, the California Housing Finance Agency (CalHFA) develops a competitive scoring system. In recent years, the scoring system has been adjusted to promote investment in affordable housing in areas with access to opportunity. Several agencies, including the Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD) in coordination with the California Tax Credit Allocation Committee (TCAC), have developed methodologies to assess and measure geographic access to opportunity (including education, poverty, transportation, and employment) in areas throughout California. The Opportunity Map created by TCAC and HCD (using data from 2020) is used to identify areas in the region whose characteristics are shown by research to support positive economic, educational, and health outcomes for families—particularly long-term outcomes for children. Further, this section will review access to opportunity in relation to education, economic development, environment, transportation, and access to opportunities for persons with disabilities.

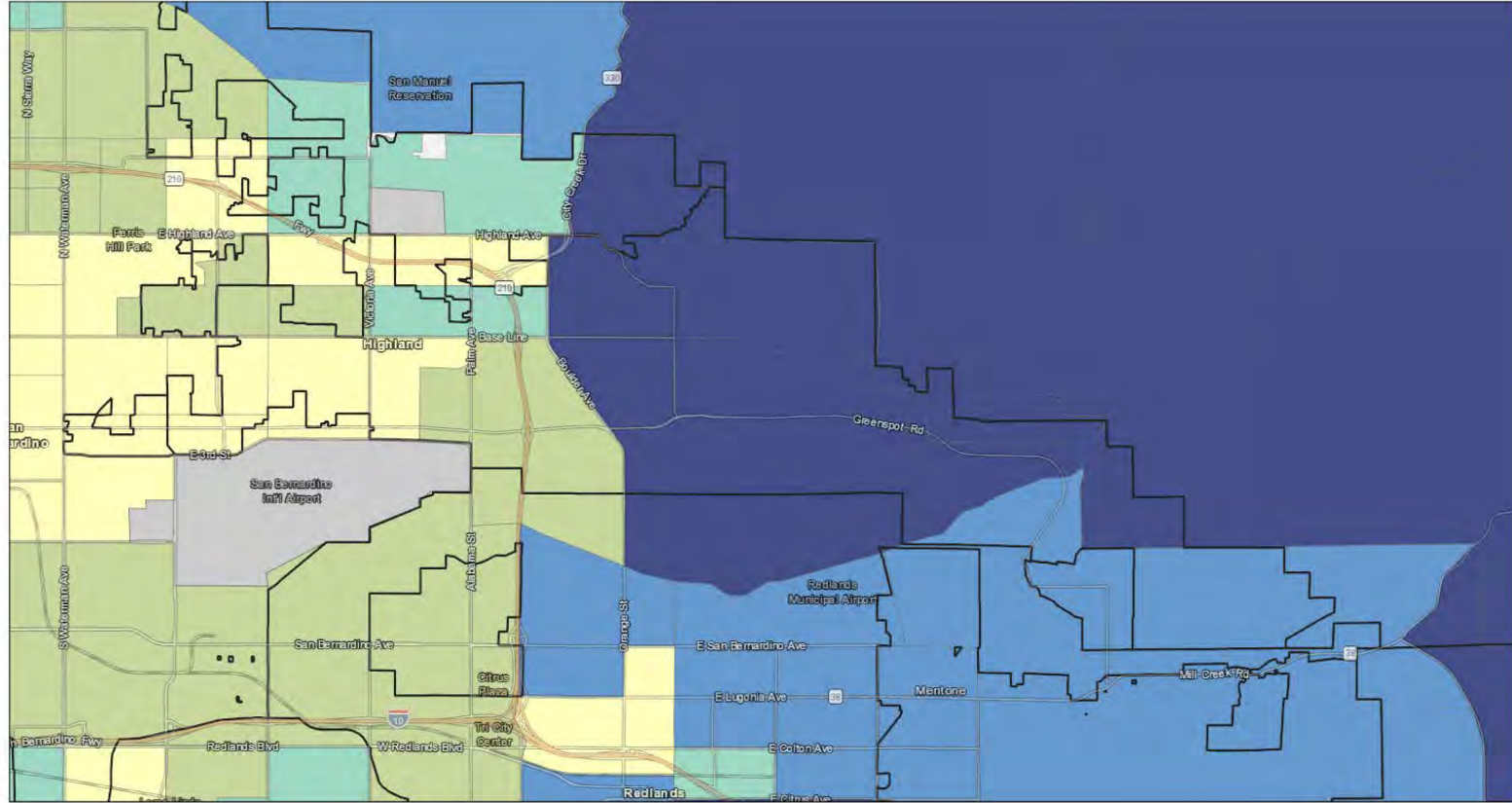
High Resource areas are those areas, according to research, that offer low-income children and adults the best chance at certain positive life outcomes: economic advancement, high educational attainment, and good physical and mental health. The Opportunity Map plays a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity. The 2021 TCAC/HCD Opportunity Map identifies the areas east of Boulder Avenue as High Resource areas (**Figure 13, Opportunity Map**). To the areas west of Boulder Avenue, tracts are identified as High Segregation & Poverty, Low Resource, and Moderate Resource. The High Segregation and Poverty area aligns with the R/ECAP zones identified in previous sections. Economic, educational, and environmental indexes show low scores in the identified R/ECAP areas. In contrast to the opportunity areas shown in the map, many

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<sup>20</sup> Freddie Mac and the National Housing Trust. Spotlight on Underserved Markets: *Opportunity Incentives in LIHTC Qualified Allocation Plans*. Freddie Mac and the National Housing Trust, 2020. [https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity\\_incentives\\_in\\_lihtc\\_qualified\\_allocation\\_plans.pdf](https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity_incentives_in_lihtc_qualified_allocation_plans.pdf)

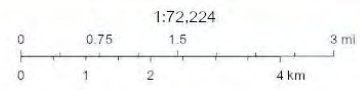
of Highland’s resources related to commercial and governmental services such as mental health facilities, mass transit access, parks and recreational facilities, food access, and other commercial services are located in the eastern portions of Highland.





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- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Composite Score - Tract
- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data



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**Figure 13. Opportunity Map<sup>21</sup>**

<sup>21</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

#### 4.5.1. Access to Education

Access to quality education is one aspect of opportunity. The City of Highland is served by the Redlands Unified School District and the San Bernardino City Unified School District.<sup>22 23</sup> The District boundaries for the Redlands Unified School District includes the eastern portion of the City until City Creek. The San Bernardino City Unified School District encompasses the western portion of the City.

Redlands Unified School District encompasses 147 square miles and serves the communities of Redlands, Loma Linda, Mentone, Forest Falls, and portions of San Bernardino and Highland. The Redlands Unified School District includes 15 elementary schools, 4 middle schools, and 4 high schools. Current enrollment is grade K-12 is 21,333 students. The ethnicity of the student population is consistent with the City of Highland ethnic/racial backgrounds (31.6 percent Caucasian and 45 percent Hispanic). The district serves 1,965 English-language learners (9.2 percent). Thirty separate languages comprise the home languages of these students. The District reportedly ranks 8/10 in testing, rank above the statewide average in both math and reading proficiency, and spends \$11,364 per student each year.

The San Bernardino City Unified School District includes 50 elementary schools, 11 middle schools, and 10 high schools. Enrollment K-12 is 53,037 students. According to the 2019-2020 district summary, there are 20.8 percent English-language learners, and 89.4 percent of students are considered socioeconomically disadvantaged. The student population is predominately Hispanic (77.7 percent). The District offers dual immersion programs at several elementary schools, spends \$12,604 annually per student, and provided 1,330 student earned scholarship/grants in 2018-19. The District reportedly ranks 3/10 in testing and falls below the statewide averages for both math and reading proficiency.

**Table 1, California Assessment of Student Performance and Progress – Science (2018-2019)**, compared the standardized test scores for grades five, eight, and high school in science by race/ethnicity for either districts.

**Table 1: California Assessment of Student Performance and Progress – Science (2018-2019)**

Student Group	Total Enrollment	Number Tested	Percent Tested	Percent Not Tested	Percent Met or Exceeded
<b><i>San Bernardino City Unified School District</i></b>					
All	11,725	11,405	97.27%	2.73%	19.32%
Black or African American	1,282	1,229	95.87%	4.13%	12.61%
American Indian or Alaska Native	45	44	97.78%	2.22%	13.64%
Asian	187	185	98.93%	1.07%	48.11%
Filipino	50	48	96.00%	4.00%	50.00%
Hispanic or Latino	9,180	8,947	97.46%	2.54%	18.18%

<sup>22</sup> Redlands Unified School District. n.d. Schools Boundary Map. <https://www.redlandsusd.net/Page/114>

<sup>23</sup> San Bernardino City Unified School District. 2021. School Boundaries. <https://sbcusd.com/cms/One.aspx?portalId=59953&pageId=1341450>



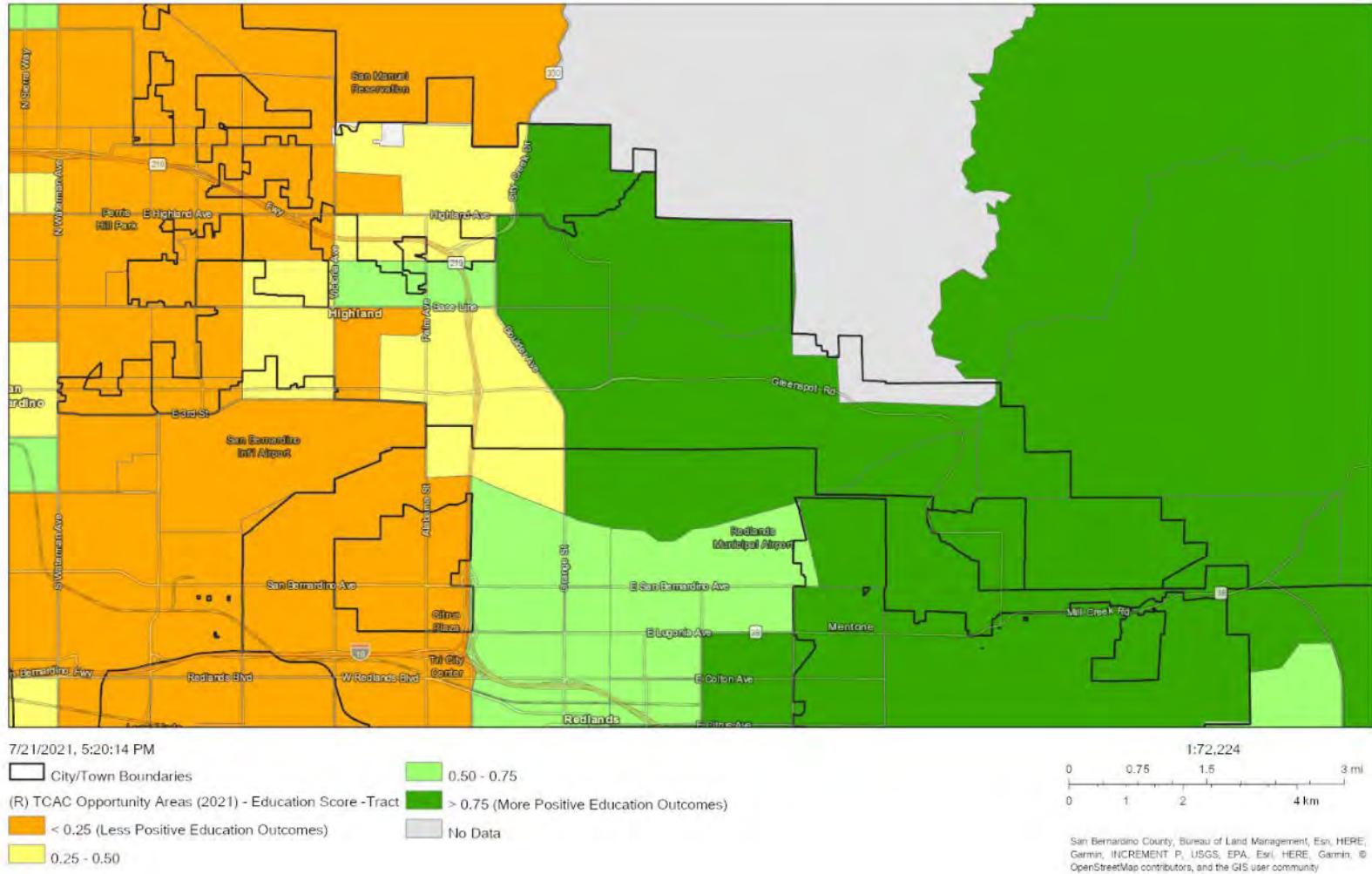
**Table 1: California Assessment of Student Performance and Progress – Science (2018-2019)**

<b>Student Group</b>	<b>Total Enrollment</b>	<b>Number Tested</b>	<b>Percent Tested</b>	<b>Percent Not Tested</b>	<b>Percent Met or Exceeded</b>
Native Hawaiian or Pacific Islander	48	48	100.00%	0.00%	18.75%
White	660	641	97.12%	2.88%	39.12%
Two or More Races	134	132	98.51%	1.49%	16.67%
<b><i>Redlands Unified School District</i></b>					
All	4,815	4,715	97.92%	2.08%	35.26%
Black or African American	302	292	96.69%	3.31%	19.18%
American Indian or Alaska Native	17	17	100.00%	0.00%	29.41%
Asian	450	443	98.44%	1.56%	64.11%
Filipino	117	117	100.00%	0.00%	47.86%
Hispanic or Latino	2,408	2,352	97.67%	2.33%	24.67%
Native Hawaiian or Pacific Islander	12	12	100.00%	0.00%	25.00%
White	1,270	1,245	98.03%	1.97%	46.14%
Two or More Races	230	228	99.13%	0.87%	43.86%
<b><i>Statewide</i></b>					
Statewide	1,563,993	1,477,006	94.44%	5.56%	29.93%
Black or African American	85,376	78,167	91.56%	8.44%	13.60%
American Indian or Alaska Native	8,234	7,486	90.92%	9.08%	21.16%
Asian	145,598	141,013	96.85%	3.15%	58.68%
Filipino	38,377	36,890	96.13%	3.87%	44.35%
Hispanic or Latino	845,305	802,572	94.94%	5.06%	18.80%
Native Hawaiian or Pacific Islander	7,338	6,870	93.62%	6.38%	21.01%
White	366,641	341,893	93.25%	6.75%	44.42%
Two or More Races	56,801	53,277	93.80%	6.20%	44.93%

Source: Department of Education. 2019. Local Educational Agency Accountability Report Card.  
<https://www.cde.ca.gov/ta/ac/le/>

As shown in **Table 1**, the San Bernardino City Unified School District overall tested lower in science by about 15 percent compared to Redlands Unified School District and 10 percent compared to the State. This trend was similar by race/ethnicity as well. Based on information published from the Department of Education, the graduation rate for Redlands Unified School District was 92.08 percent compared to 83.35 percent for San Bernardino City Unified School District.

**Figure 14, Opportunity for Education**, shows the access to opportunity for education, which displays high levels of opportunity in eastern Highland, and less positive outcomes in western Highland. These differences follow school district lines, with the Redlands Unified School District census tracts scoring higher than the San Bernardino Unified School District tracts.



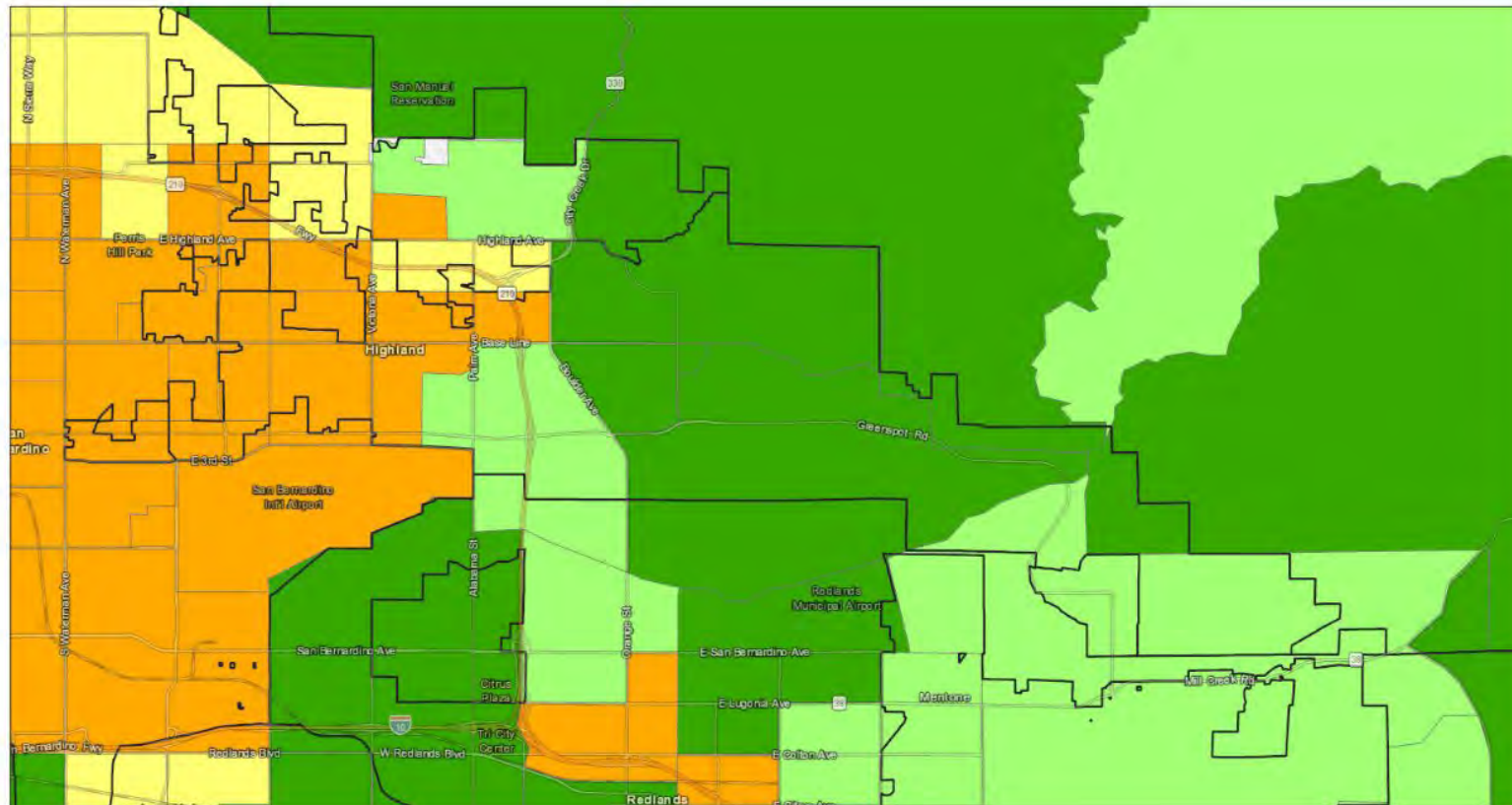
San Bernardino County, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © CA HCD

**Figure 14. Opportunity for Education<sup>24</sup>**

<sup>24</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

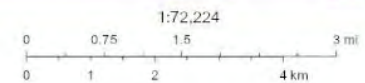
#### 4.5.2. Access to Economic Opportunity

**Figure 15, Economic Outcomes**, shows access to economic opportunity. Less positive economic outcomes are in western Highland. **Figure 16, Jobs Proximity Index**, measures the physical distances between resident and jobs, by geography. As shown in **Figure 16**, the portion of the City in closest proximity to the City of San Bernardino to the west, had the highest jobs proximity index. The uses to the west and southwest of the City, near the San Bernardino International Airport, are predominately industrial. Due to the low job proximity in East Highland, the East Highland residents are more likely to commute via vehicle, traveling longer distances. The cost of owning a vehicle can be a financial burden for many lower-income households and long commutes can be even more burdensome due to the expense of fuel consumption and vehicle repairs associated with increased use.



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- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Economic Score - Tract
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)



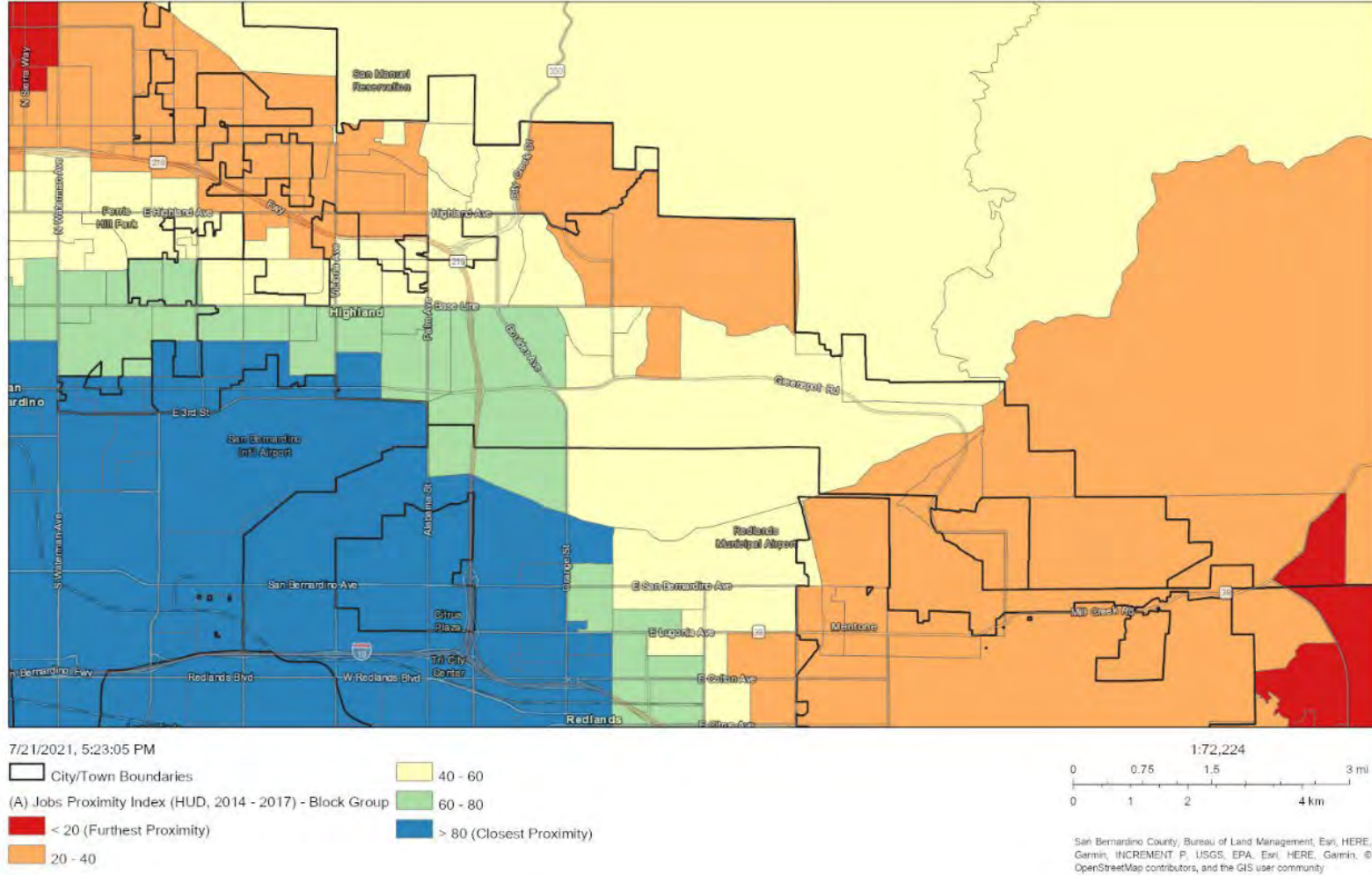
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Figure 15. Economic Outcomes<sup>25</sup>

<sup>25</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.





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Figure 16. Jobs Proximity Index<sup>26</sup>

<sup>26</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

### 4.5.3. Access to Transportation

Access to transportation opportunities is important, especially for lower-income earning households who may not be able to afford a car. In more rural, suburban, or isolated areas, access to a car may be higher due to necessity and lack of transit opportunities. The rates of automobile ownership can be seen on **Figure 17, Automobile Ownership Rates**. They are higher in eastern Highland, which consists of higher income households, primarily white households, and further proximity to employment. Western Highland has lower rates of automobile ownership, which makes sense given the higher concentrations of poverty and lower incomes. Communities with low automobile ownership rates can be benefitted by access to public transit and walkable communities. **Figure 18, Access to Transit**, shows that western Highland is well served by bus stops, with nearly the entire area within walking distance to a transit stop. Eastern Highland, with higher average household incomes and more a suburban setting, is not within walking or biking distance of transit stops. Major transit stops run along Baseline Street, East 9<sup>th</sup> Street, Palm Avenue, and Church Street. Although western Highland has increased job proximity and transit access as compared to eastern Highland, the specific quality and pay rates associated with the most accessible jobs is unclear.

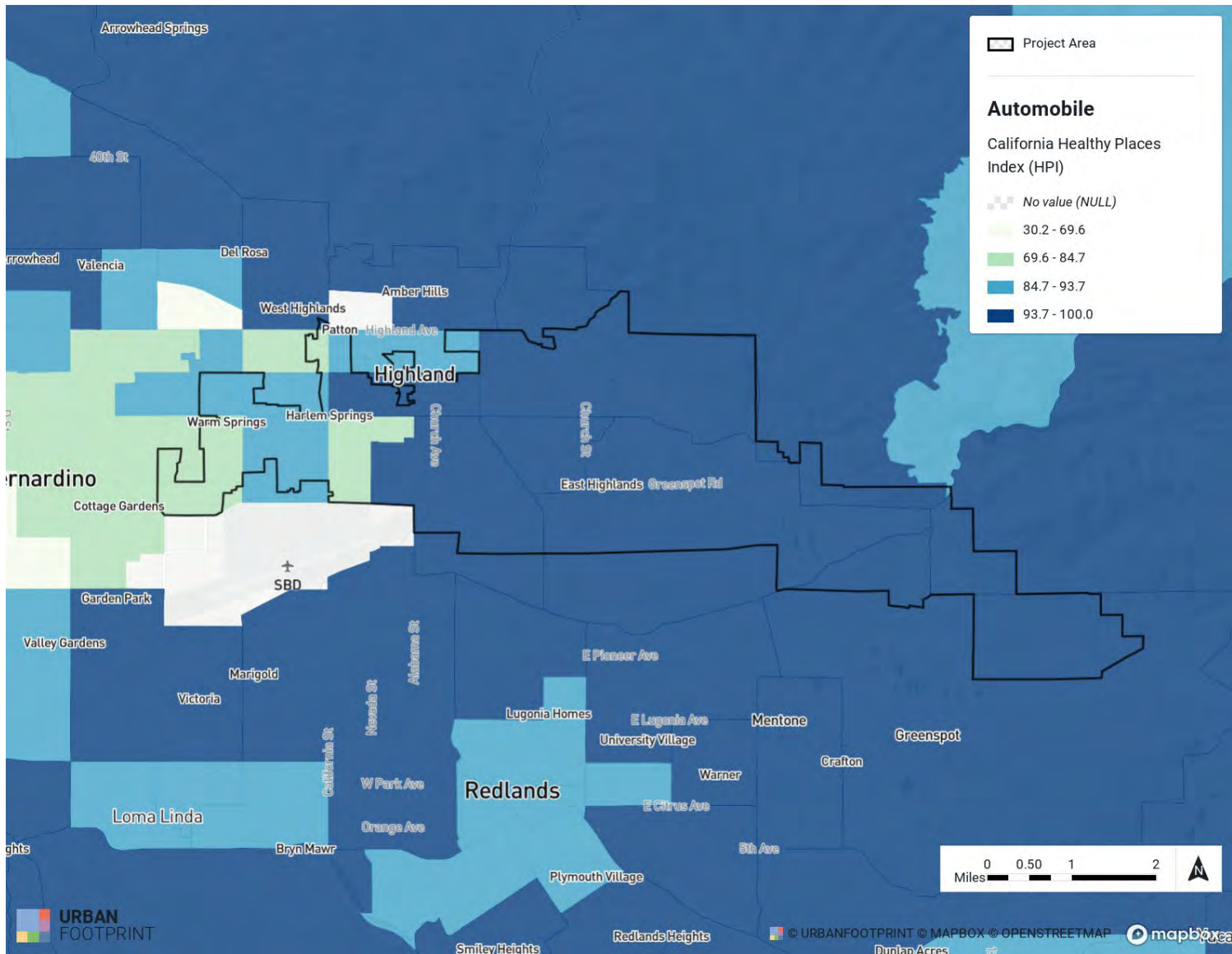
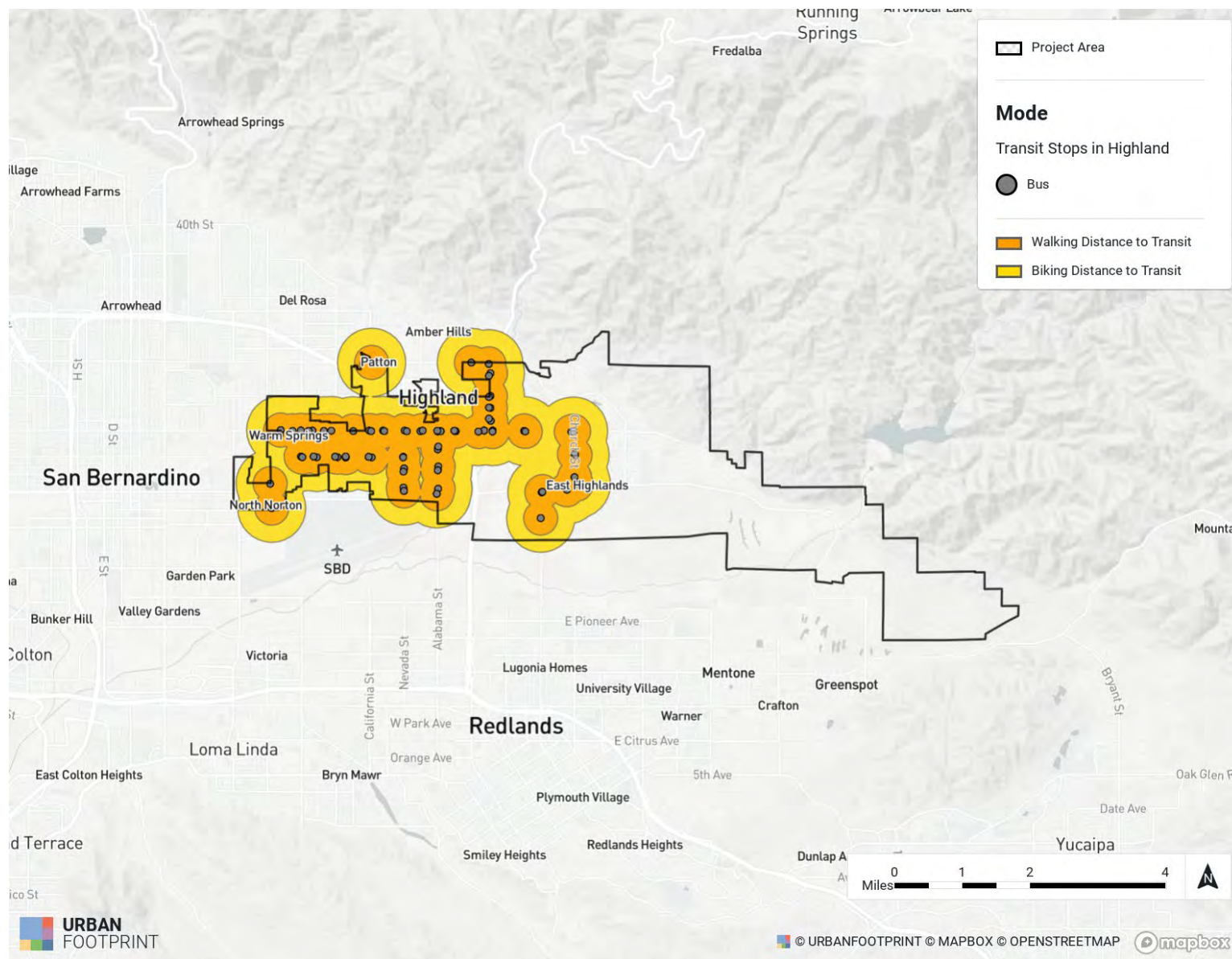


Figure 17. Automobile Ownership Rates

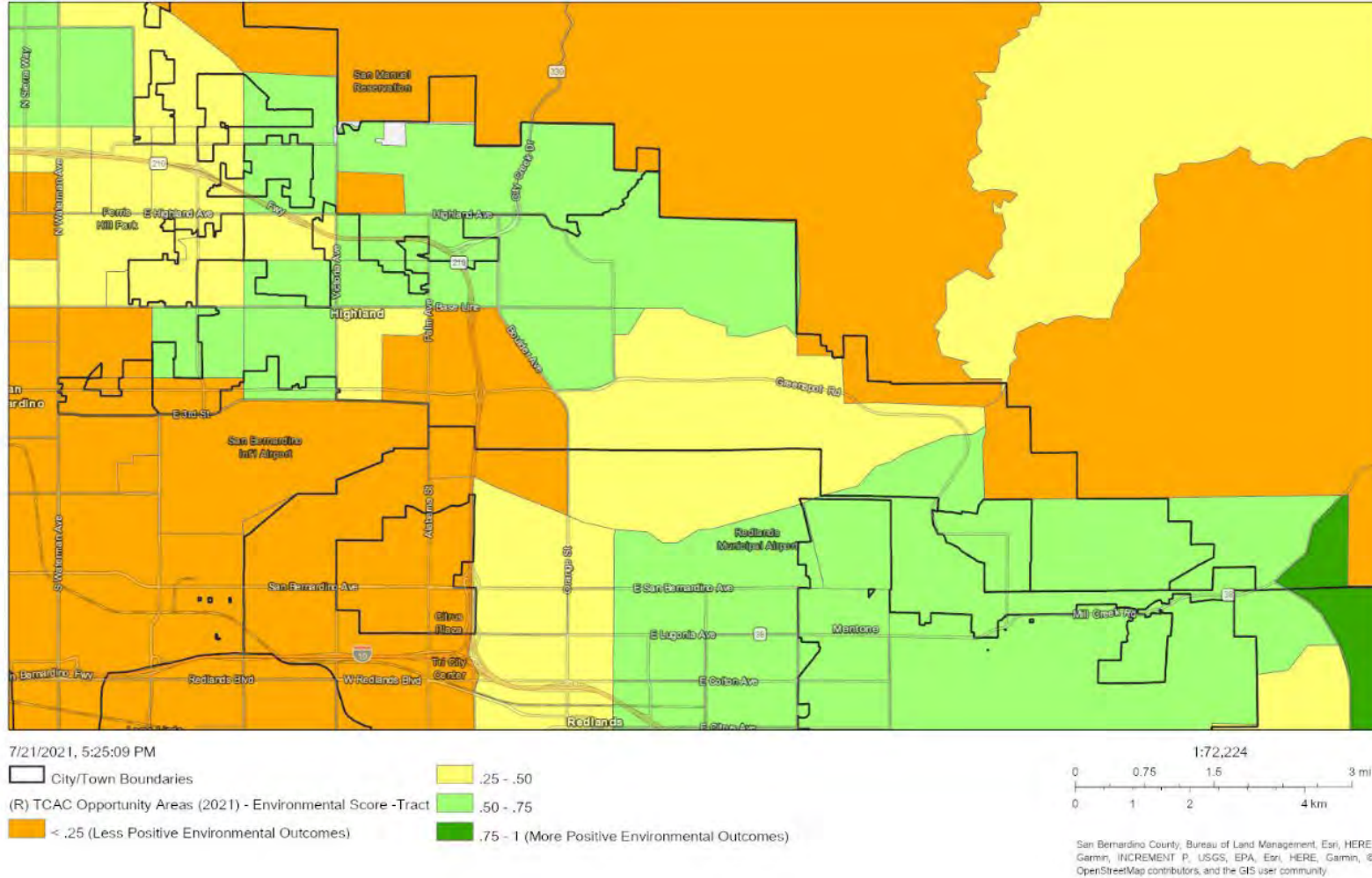




**Figure 18. Access to Transit**

#### 4.5.4. Access to a Healthy Environment

Access to a clean and healthy environment is an important part of physical and mental health, as well as overall quality of life for residents. Levels of air pollution, water quality, access to open spaces, vegetation and more contribute to environmental factors that go into different indexes which attempt to distinguish levels of environmental quality. **Figure 19, Environmental Outcomes**, shows environmental outcomes. This figure demonstrates that much of Highland has relatively positive environmental outcomes where the farthest southwestern portion of the City, the south-central portion of the City, and a sliver of the north eastern portion of the City has the lowest scores with less than positive environmental outcomes. Moderately positive outcomes are in the eastern and western most portions of the City.



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**Figure 19. Opportunity for a Healthy Environment<sup>27</sup>**

<sup>27</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

Pollution burden is another aspect of environmental quality and can be visualized using CalEnviroScreen. Displayed on **Figure 20, CalEnviroScreen 3.0**, is a mapping tool that identifies the most affected areas by sources of pollution using environmental, health, and socioeconomic information to produce scores for every census tract in the state. Areas with high scores experience a much higher pollution burden than areas with low scores. To the west of Boulder Avenue and south of Baseline Street, the pollution burden is in the 60<sup>th</sup> – 90<sup>th</sup> percentile compared to the state of California. The highest pollution burden is the tract that is along the north-south portion of I-210. Some specific pollution factors that are especially poor in some of the more pollution burdened areas in Highland include ozone, particulate matter of 2.5 microns or less (PM 2.5), and hazardous waste exposure.



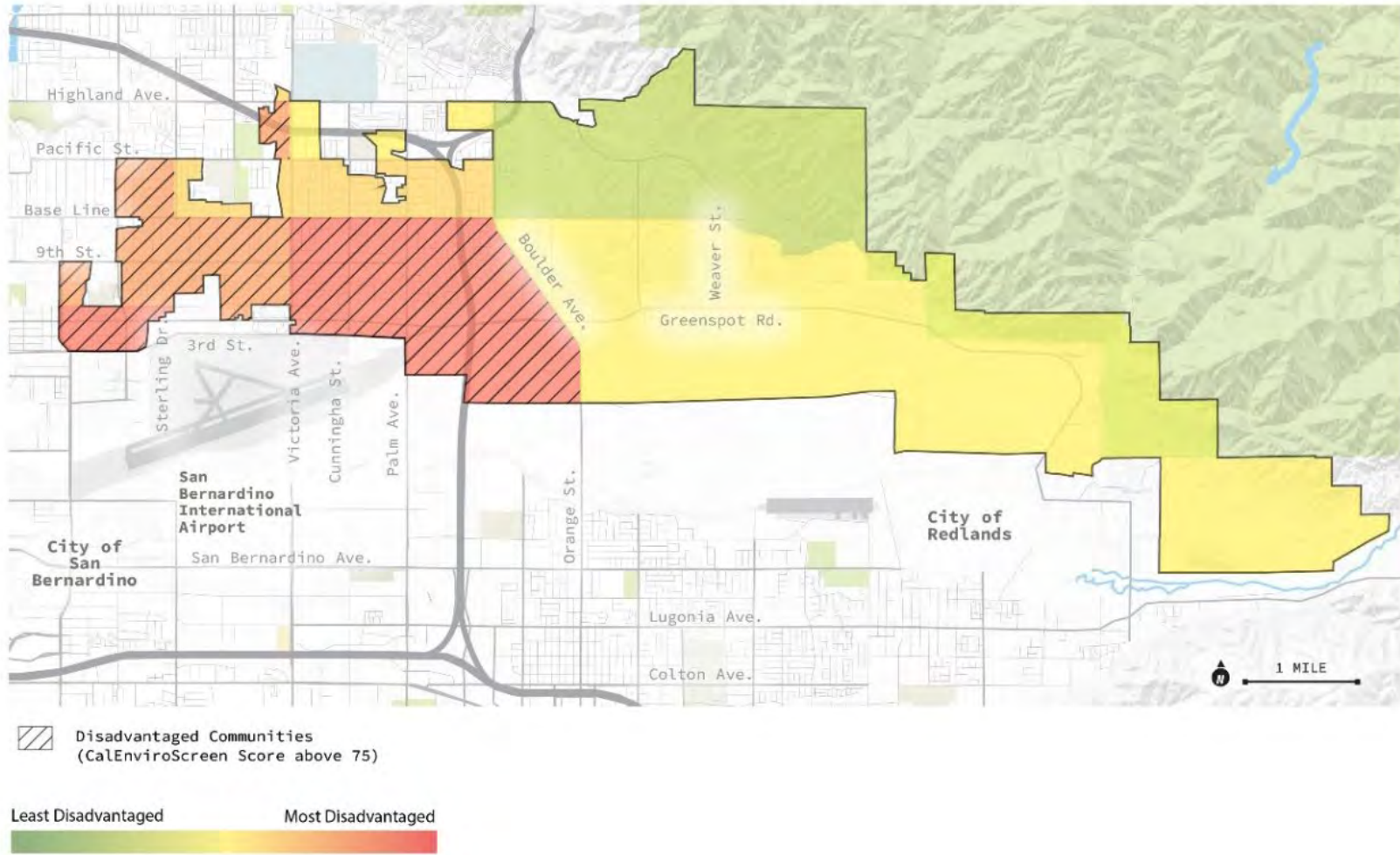
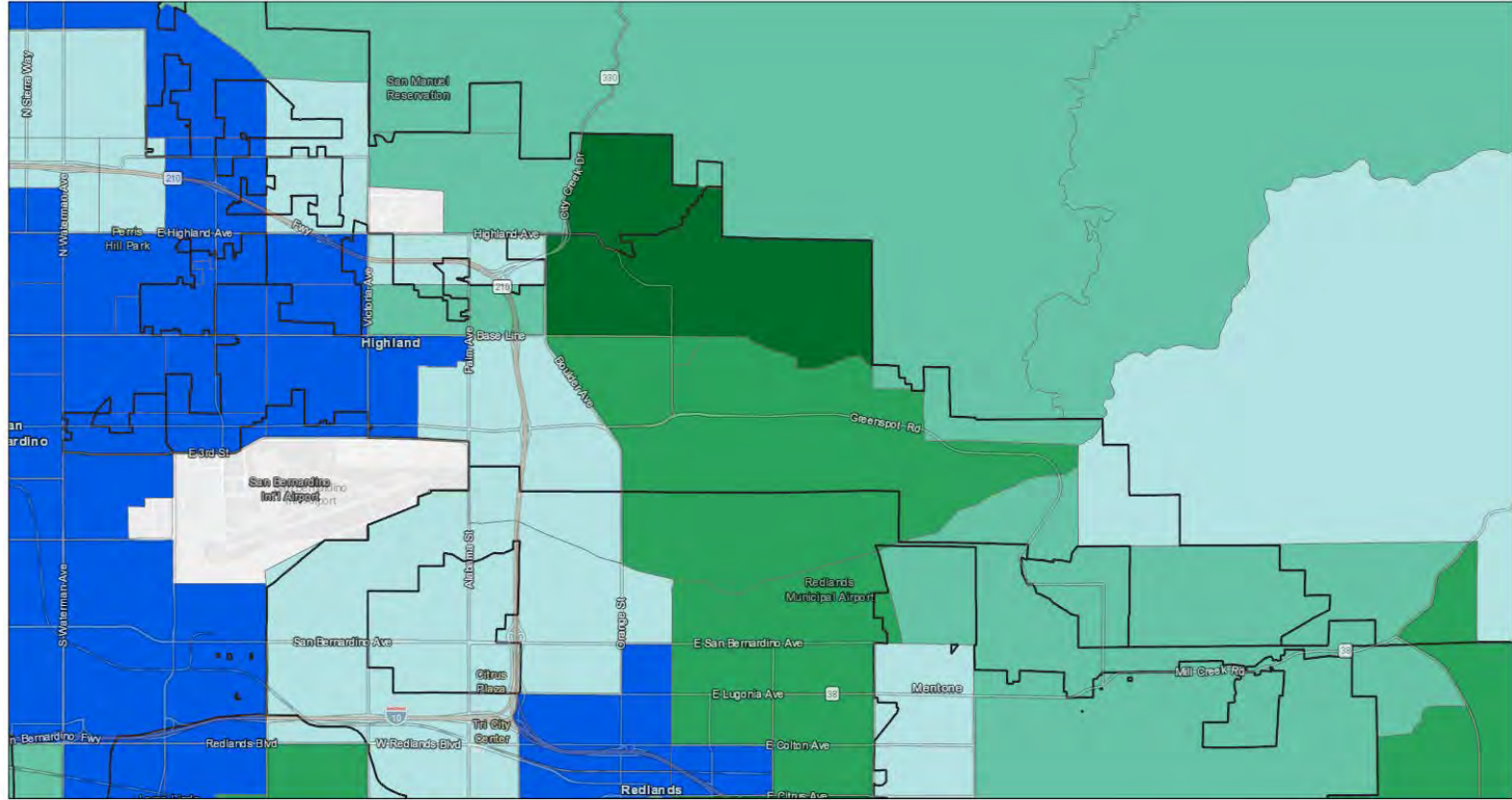


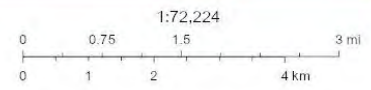
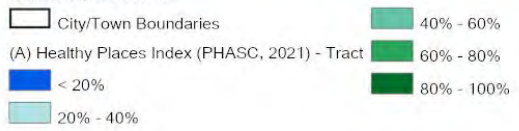
Figure 20. CalEnviroScreen 3.0<sup>28</sup>

<sup>28</sup> OEHA. 2018. CalEnviroScreen 3.0. <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

The Healthy Places Index (HPI) uses data that impacts personal health and compiles it to show where the healthiest and least healthy places are to live. In Highland, the least healthy environment is again found in the western portion of town, for the most part to the west of Victoria Avenue. Some concerning health indicators include high levels of asthma, diabetes, poor mental health, and low infant birth weight. Life expectancy at birth is one of the easiest to understand and starkest indicators of quality of life and healthy living. All of Highland west of Boulder Avenue is in the bottom 25<sup>th</sup> percentile for the state of California for life expectancy at birth, at less than 77 years. **Figure 21, Healthy Places Index,** shows the HPI scores for Highland.



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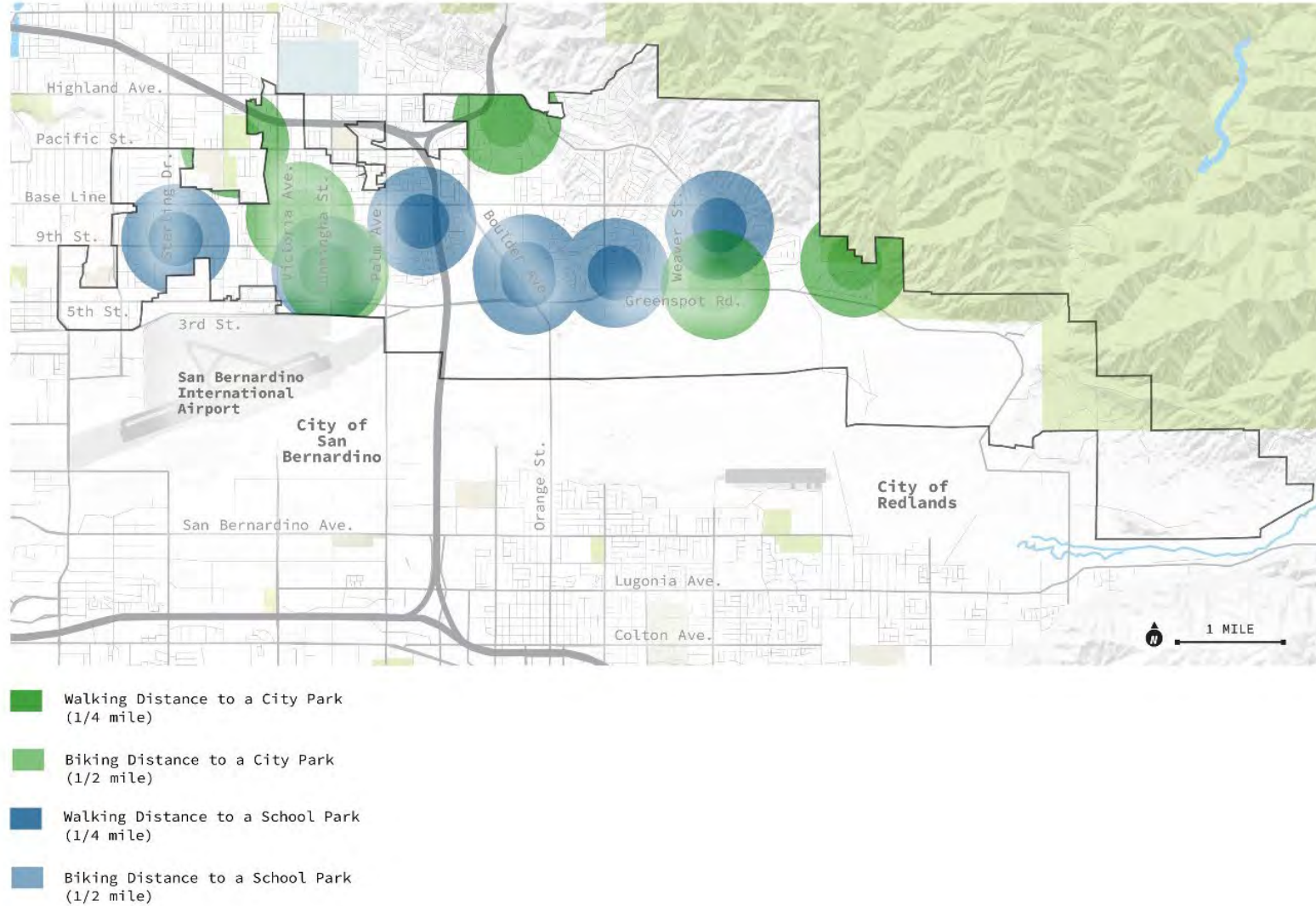
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**Figure 21. Healthy Places Index<sup>29</sup>**

<sup>29</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

The presence and quality of parks and open spaces are another factor that is considered when determining if an environment is healthy or not. **Figure 22, Parks**, displays parks in the City and schools which have park areas that are opened for public use during hours that the school is not in operation. Parks are least prevalent in the eastern and northern portions of Highland. While it may be farther from conventional city parks, the northeastern portion of Highland has much closer access to open space just outside city limits. The City relies on the school parks to provide adequate park space for residents.





**Figure 22. Parks**<sup>30</sup>

<sup>30</sup> City of Highland. 2020.

Further, improvement to the environmental health of neighborhoods requires multiple levels of efforts, including land use planning, transportation considerations, urban forest management, healthy food options, park investments and more.

#### 4.5.5. Access to Opportunity for Person with Disabilities

Trends related to persons with disabilities, including local and state analysis of prevalence of disabilities by type and age group are included in **Appendix B – Community Profile**. Some common regulatory barriers that can exist for persons with disabilities include:

- Reasonable Accommodation Procedure
  - Common issues with reasonable accommodation procedures include excessive findings of approval, burden on applicants to prove the need for exception, application costs, and discretionary approvals.
- Family Definition
  - Family definitions in zoning or other land use related documents can directly impact housing choices for persons with disabilities, particularly regarding group home situations which are commonly utilized by persons with disabilities. Regulating the number of people or requiring occupants to be related can be common elements in family definitions that create barriers.
- Excluding Group Homes
  - Excluding group homes or subjecting these homes to a conditional use permit in single family zones acts as a barrier to housing choice for persons with disabilities.
- Spacing Requirements
  - Excessive spacing requirements between group homes or community or residential care facilities can directly impact the supply of housing choices for persons with disabilities.
- Unit Types and Sizes
  - The lack of multifamily housing or zoned capacity for multifamily and a variety of sizes from efficiency to four or more bedrooms can constrain the ability of persons with disabilities to live in a more integrated community setting.
- Lack of By Right Zoning for Supportive Housing
  - By right zoning for supportive housing can result in more objective processes that are less likely to discriminate or have the effect of discriminating against persons with disabilities.<sup>31</sup>

Some of the overarching goals and specific policies within the Housing Element encourage equal access to housing and services to meet the needs of persons with disabilities, including:

- Policy 5.1, to provide the regulatory framework necessary to facilitate housing for those with special needs.
- Program 5.2, to encourage development of accessible housing for levels of ability through regulatory relief.
- Policy 5.4, to support innovative public private, and nonprofit efforts in the development and financing of affordable, special needs housing.

The City has multiple transitional housing homes currently. Two are six-bed facilities, and one of them is reserved for adults ages 18 to 26, while the other is for any unhoused person. The City does not have permanent supportive housing stock within the City limits; however, permanent supportive housing is

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<sup>31</sup> HCD. (2021, April). Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements. [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf)

available in adjacent cities. The San Bernardino Department of Behavioral Health Homeless Program provides supportive housing and counseling services for mentally ill persons and are located in the City of San Bernardino. The City has within the municipal code, definitions and regulations regarding emergency shelters, transitional housing, and permanent supportive housing.

In an effort to prevent and combat homelessness, the City and its partners are also currently participating in the following activities:

- The Community Development Department provides information and referrals to homeless individuals and families for Housing Choice Vouchers as needed.
- The Department of Public Works conducts cleanups for city-owned land and in the public right-of-way Citywide.
- Outreach and engagement through the Sheriff's Department including the County's HOPE Team.
- The Code Enforcement Division responds to homelessness-related complaints regarding private property.
- The Highland Library, Community Center, YMCA, and Senior Center in Highland provides air-conditioned rest areas in dangerously hot weather.
- Saint Adelaide Catholic Church provides emergency food provisions, employment assistance, and marriage counseling.
- The Community Action Partnership of San Bernardino County conducts countywide housing needs assessment. This effort trains and utilizes homeless service providers, formerly homeless persons, and currently homeless persons to collect data.
- Vista Guidance Centers of Highland offers psychiatric evaluations, counseling, and referral services.

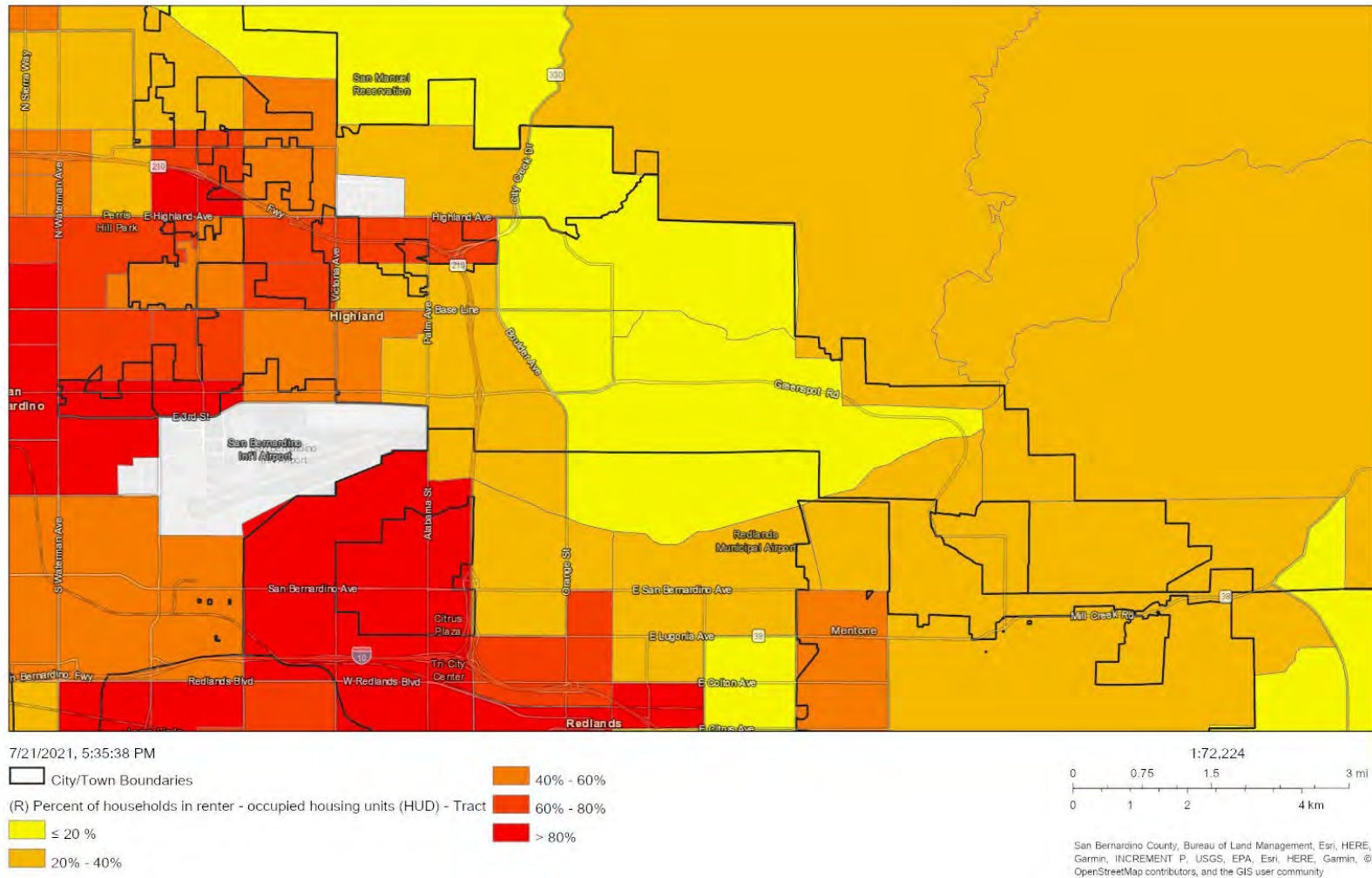
Programs 21 and 31 of the Housing Element implement strategies to provide support for those experiencing homelessness through emergency shelters, transitional housing, permanent supportive housing, and Low Barrier Navigation Centers.

## 4.6. Disproportionate Housing Needs and Displacement Risk

Homeownership is the largest asset of most households in the U.S. and, for many households, provides increased opportunity for future generations through increased family wealth. With increased family wealth, younger generations are often afforded increased educational opportunities, higher employment attainment, and access to inheritance. One of the most prevalent consequences of residential segregation is the intergenerational inaccessibility of homeownership. According to the Census, a total of 10,796 occupied units (66.9 percent) in the city were owner-occupied in 2019, while 5,342 units (33.1 percent) were renter-occupied. The rate of owner-occupied units in the City increased by 3.6 percent between 2014 to 2019, while the rate of owner-occupied units in the County decreased by 1.1 percent.<sup>32</sup> The area with the highest percentage of owner-occupied units coincides with the areas that predominantly consist of White residents, have a higher percentage of married-couple households, have higher incomes, increased access to vehicles, and have a lower percentage of persons with disabilities.

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<sup>32</sup> US Census Bureau. 2019. Comparative Housing Characteristics. 2019 ACS 5-Year Estimates. Table CP04.



San Bernardino County, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © CA HCD

**Figure 23. Percent of Renter-Occupied Housing Units<sup>33</sup>**

<sup>33</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



#### 4.6.1. Housing Affordability

Housing affordability depends on a number of factors in the housing market, economy, and community. Affordability can be broken up into how affordable it is to rent and how affordable it is to be a homeowner. **Table 1, Household Tenure**, identifies the owner and renter rates within the city, showing that homeownership is more prevalent than renting. However, homeownership rates decreased from 2010 to 2019. During the 1990s, owner-occupancy rates in Highland increased as more single-family homes were built. This development trend resulted in a relatively high percentage of owner-occupied units. Overall, the number of renter-occupied units in Highland increased by almost 900 between 2010 and 2018; however, the share of renters in Highland is lower than in the SCAG region overall with 47.5 percent renters. As shown in **Figure 23**, above, renters are primarily located in western Highland. Central and eastern Highland are primarily occupied by homeowners.

**Table 1: Household Tenure**

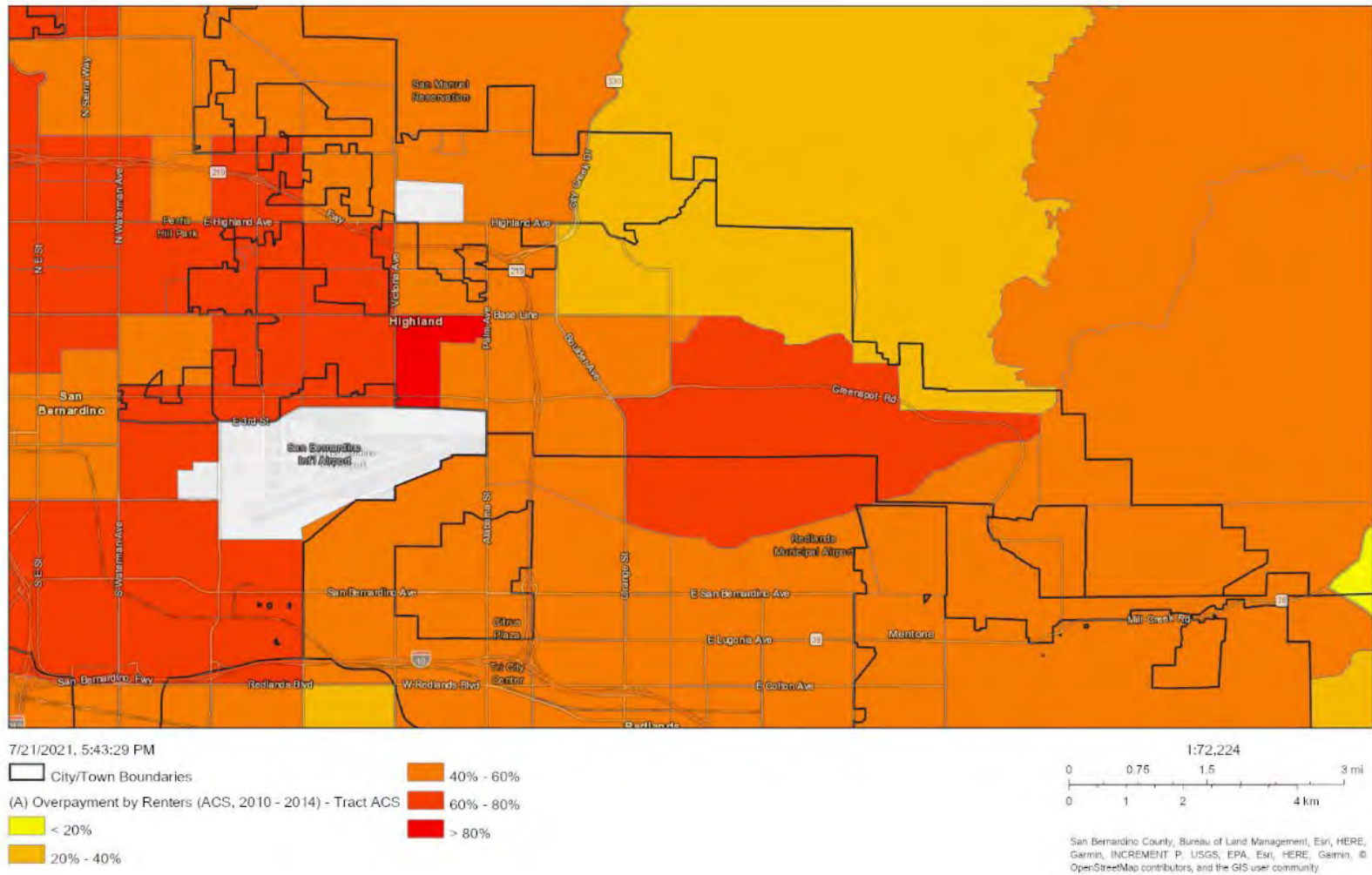
Tenure	2010 <sup>34</sup>		2019 <sup>35</sup>	
	Number	Percent	Number	Percent
Owner-Occupied	10,014	68.2	10,797	66.9
Renter-Occupied	4,675	31.8	5,341	33.1
<b>Total</b>	<b>14,689</b>	<b>100</b>	<b>16,138</b>	<b>100</b>

According to the federal government, households are considered to be burdened by their housing costs when more than 30 percent of their income is spent on total housing costs, including utilities. In 2019, 62 percent of all renters were cost burdened by their housing. This renter cost burden can be seen on **Figure 24, Renter Cost Burden**, with high levels in western Highland as well as south-central Highland, coinciding with the concentrations of renters and lower incomes. The City Community Development Department works with the Housing Authority to assist those residents with a rental cost burden by providing public assistance or Housing Choice Vouchers. In 2019, 35 percent of all homeowners had a were burdened by their housing costs. **Figure 25, Homeowner Cost Burden**, below, displays the homeowner cost burden, which is most dramatic in western Highland, although much of the City's households are burdened by their housing costs.<sup>36</sup>

<sup>34</sup> US Census Bureau. 2010. Selected Housing Characteristics. 2010 ACS 5-Year Estimates Data Profiles. Table DP04.

<sup>35</sup> US Census Bureau. 2019. Selected Housing Characteristics. 2019 ACS 5-Year Estimates Data Profiles. Table DP04.

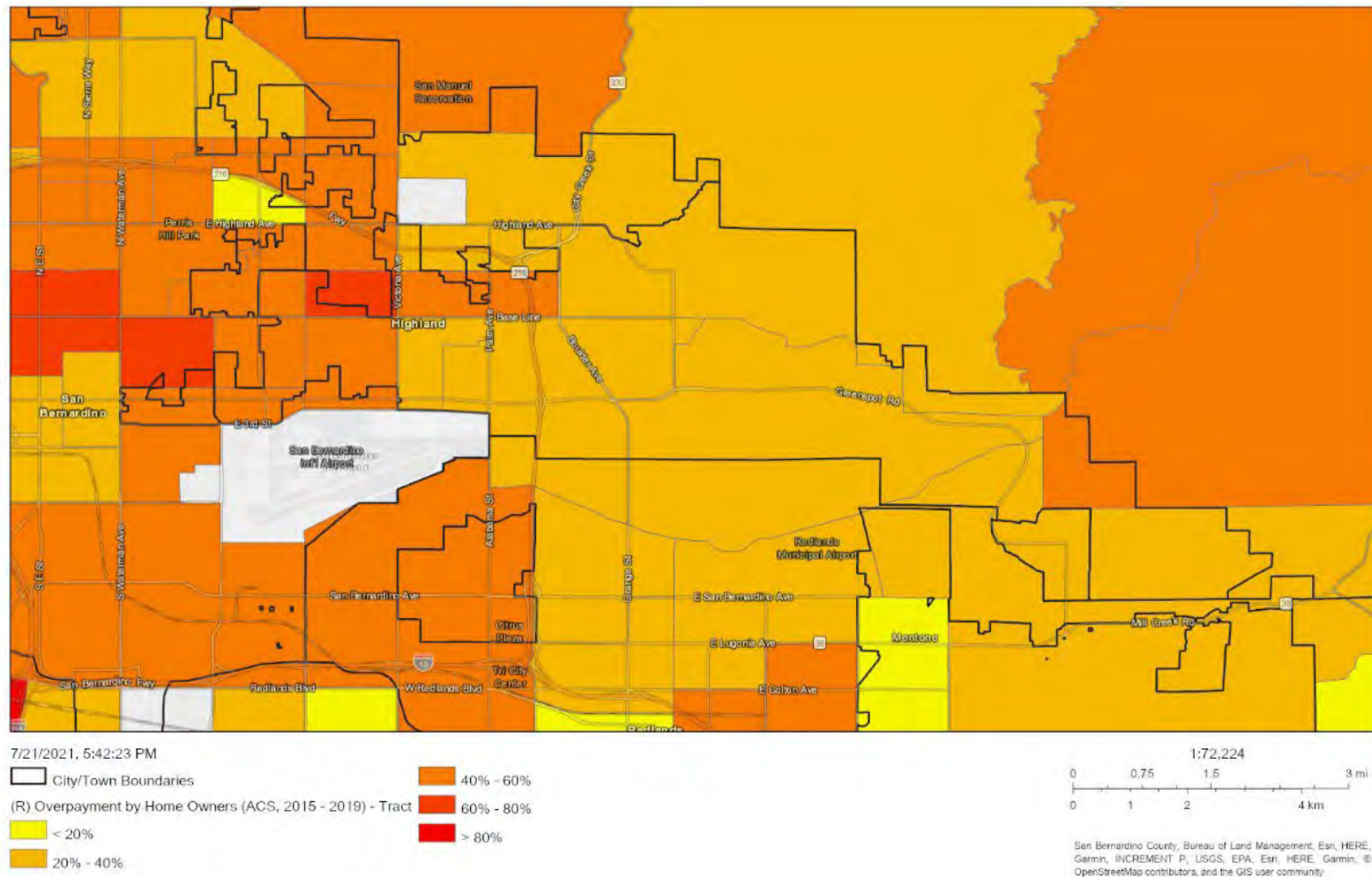
<sup>36</sup> US Census Bureau. 2019. Selected Housing Characteristics. 2019 ACS 5-Year Estimates Data Profiles. Table DP04.



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**Figure 24. Renter Cost Burden<sup>37</sup>**

<sup>37</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



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**Figure 25. Homeowner Cost Burden<sup>38</sup>**

<sup>38</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



#### 4.6.2. Housing Conditions

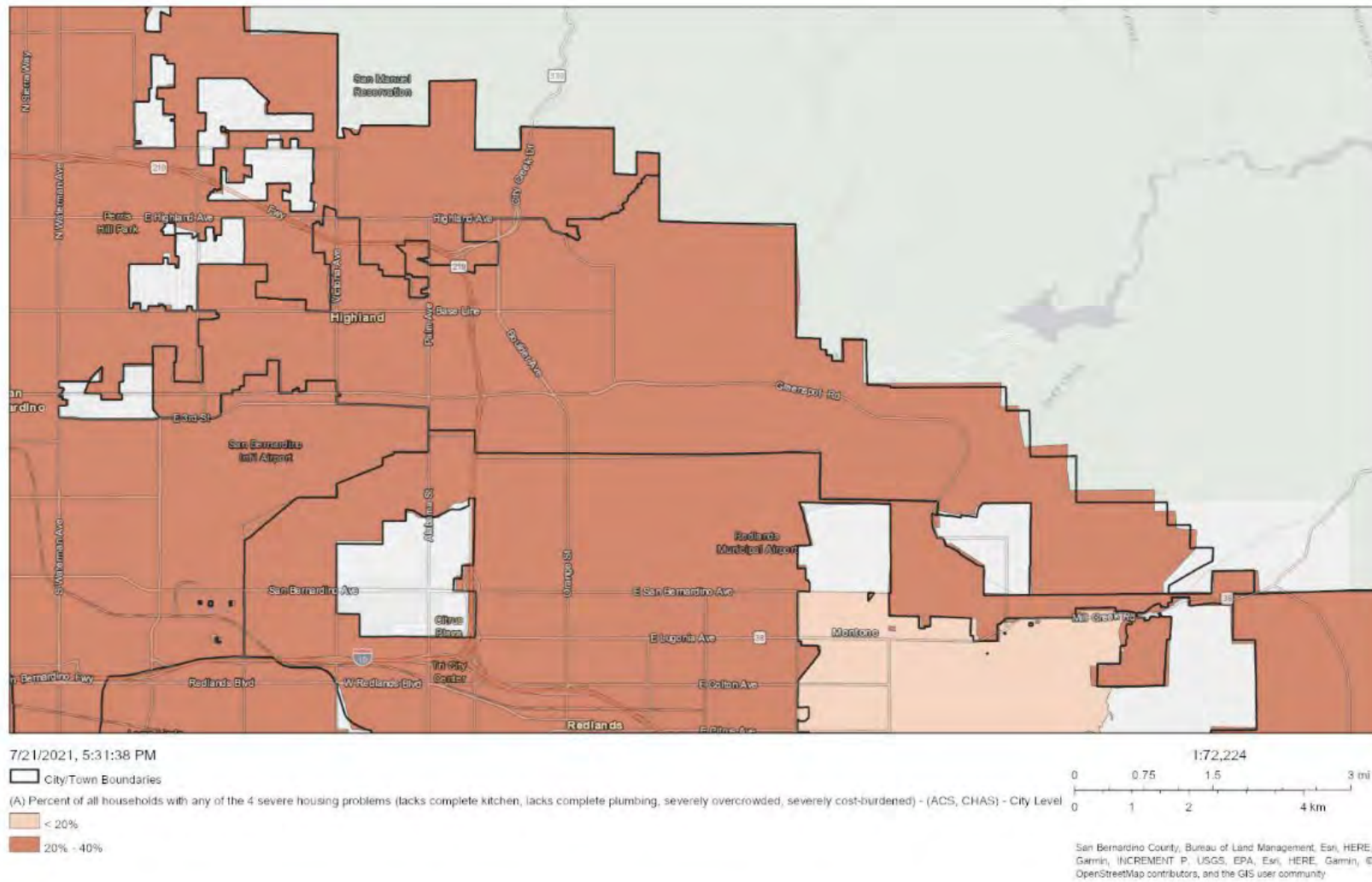
The quality of housing is dependent on more than just homeownership and requires residents and property owners to be diligent and able to fix or afford to fix issues as they come up. There are four housing problems that are considered severe, which include: lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and monthly housing costs exceeding 30 percent of monthly income. **Table 2, Severe Housing Problems**, shows an overview of households with any one of the four severe housing problems by housing tenure. This table shows that renters disproportionately have any one of the four severe housing problems compared to homeowners. **Figure 26, Any Four Housing Severe Problems**, displays this data for the entirety of Highland, where and one of the severe housing problems impacts 26 percent of all households.

**Table 2. Households with Any One of the Four Severe Housing Problems<sup>39</sup>**

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Renters	2,420	5,540	43.68%
Homeowners	1,715	10,245	16.74%
<b>Total</b>	<b>4,135</b>	<b>15,785</b>	<b>26.19%</b>

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<sup>39</sup> HUD. 2017. Consolidated Planning/CHAS Data. <https://www.huduser.gov/portal/datasets/cp.html>



**Figure 26. Any Four Severe Housing Problems<sup>40</sup>**

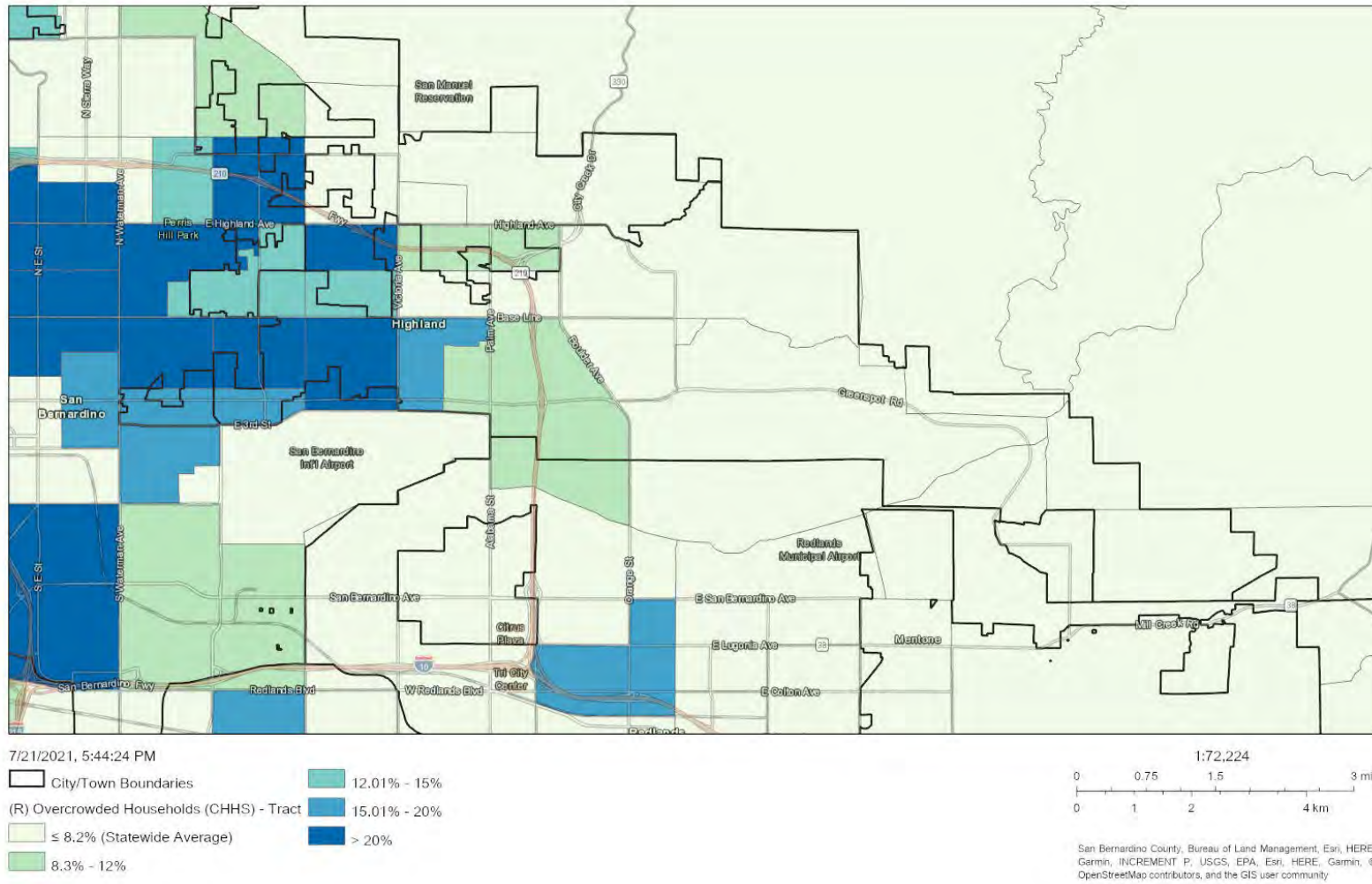
<sup>40</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

### 4.6.3. Overcrowding

The condition of an area’s housing stock is not in itself an impediment to fair housing. However, for many low-income families, substandard housing is the only housing available at an affordable price. According to the 2019 ACS, 34 occupied units in Highland lacked complete plumbing facilities. In addition, 136 occupied units in Highland lacked complete kitchen facilities. There may be some overlap in the number of substandard housing units, as some units may lack both complete plumbing and kitchen facilities. Approximately 10 percent of Highland’s total households are overcrowded.<sup>41</sup> Rates of overcrowding can be seen on **Figure 27, Overcrowding**, below, with the highest rates being seen in the western core.

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<sup>41</sup> US Census Bureau. 2019. Selected Housing Characteristics. 2019 ACS 5-Year Estimates Data Profiles. Table DP04.



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**Figure 27. Overcrowding**<sup>42</sup>

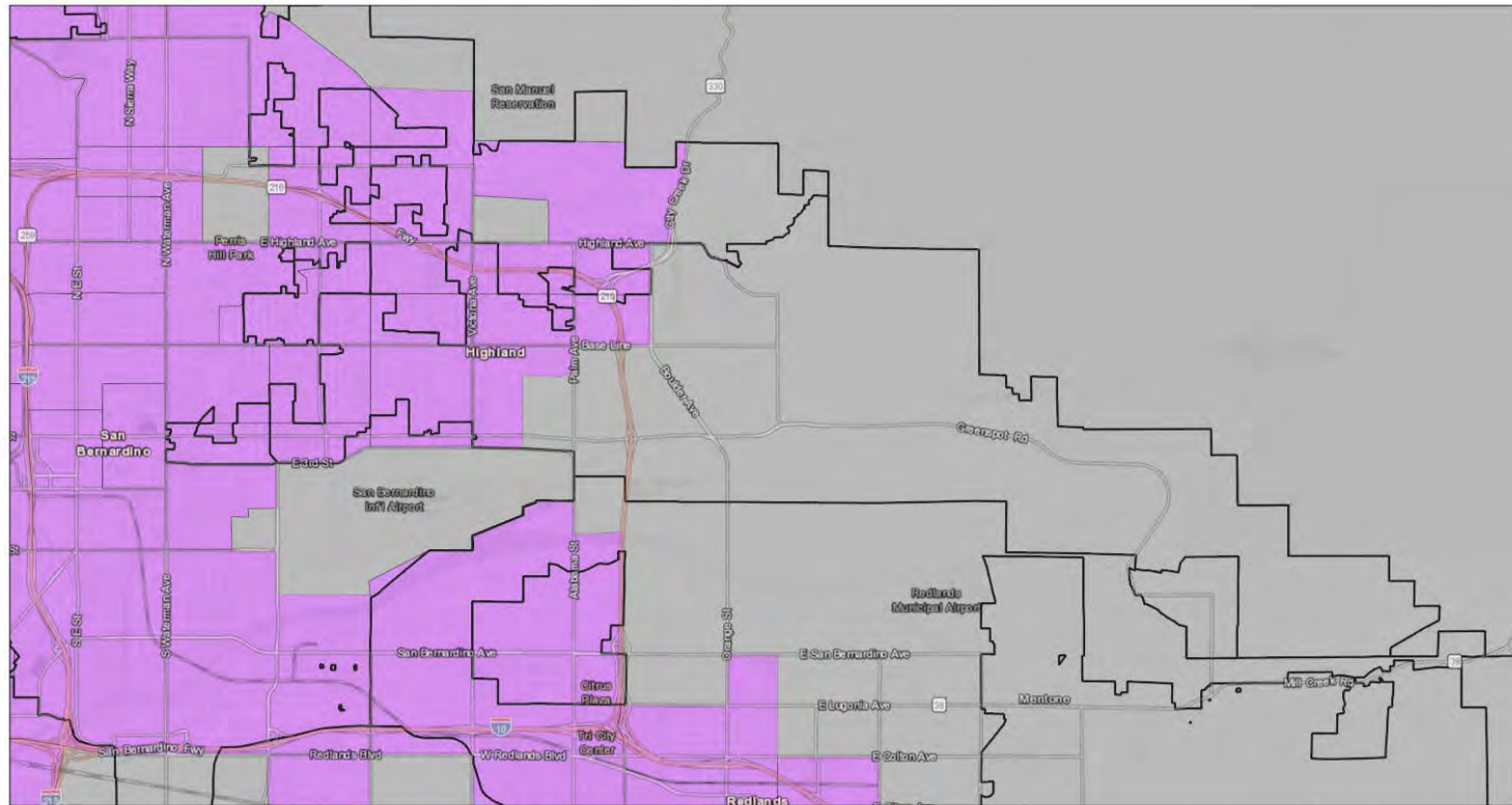
<sup>42</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

#### 4.6.4. Displacement

Displacement is an event that occurs for various reasons, including investment, disinvestment, or even disasters. Gentrification, or the influx of capital and higher-income residents into working-class neighborhoods, is often associated with displacement, which occurs when an increase in demand increase rents for both residential and commercial properties and lower-income households and businesses are priced out of the community or excluded from entering into the community.

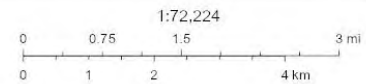
There are different stages of displacement, including at risk of displacement, early gentrification, and advanced gentrification. It is important to understand these stages in context of an area because certain policies to counteract displacement may be more or less effective depending on the stage of displacement. **Figure 28, Communities Sensitive to Displacement**, shows western Highland to be vulnerable to displacement. This is not surprising because these communities have higher levels of poverty and therefore are more vulnerable to increases in rent.





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- City/Town Boundaries
- (A) Sensitive Communities (UCB, Urban Displacement Project)
- Vulnerable
- Other



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**Figure 28. Communities Sensitive to Displacement<sup>43</sup>**

<sup>43</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.

In regard to natural disasters, some areas may be more vulnerable to disaster-driven displacement due to different hazard risks by location. Fires are more likely to impact northern and eastern Highland in the Fire Hazard Severity Zones that can be seen on **Figure 29, Fire Hazards**, below. Flooding is more of a concern for south-central Highland, and a portion of western Highland along Warm Creek. The flood areas in southern Highland are less of a concern due to the lack of residential land uses there, but along Highland Creek there are some residential areas which could be at risk of flood-driven displacement or concerns with mold after a flood. **Figure 30, Flood Hazards**, displays where these flood zones are located in the City. Seismic hazards are another hazard event which has the potential to cause long or short-term displacement. There are Alquist-Priolo fault zones which run diagonally across eastern Highland and can be seen on **Figure 31, Seismic Hazards**. While disasters in this area could cause displacement, higher average incomes provide more options for household recovery.

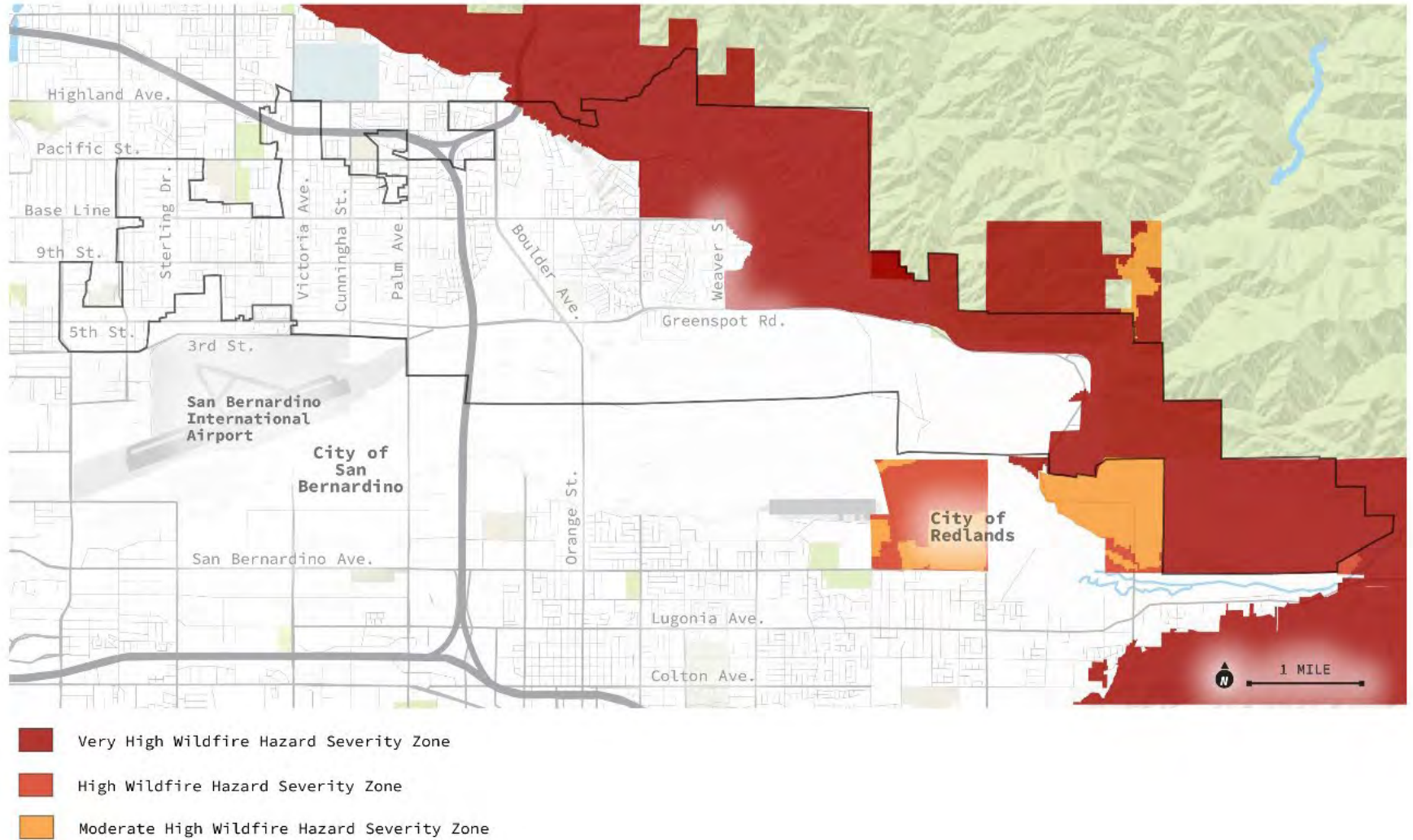
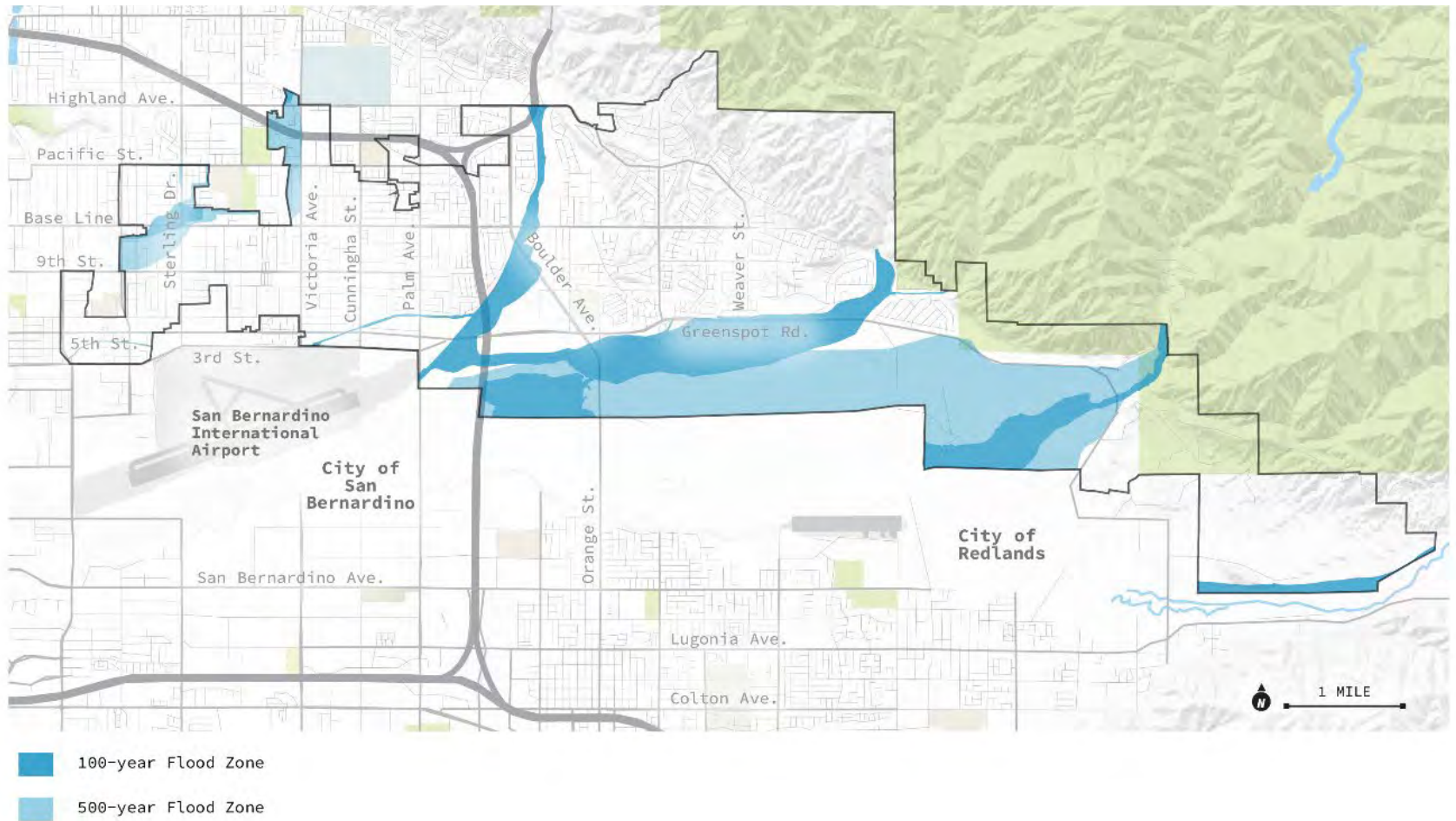


Figure 29. Fire Hazards<sup>44</sup>

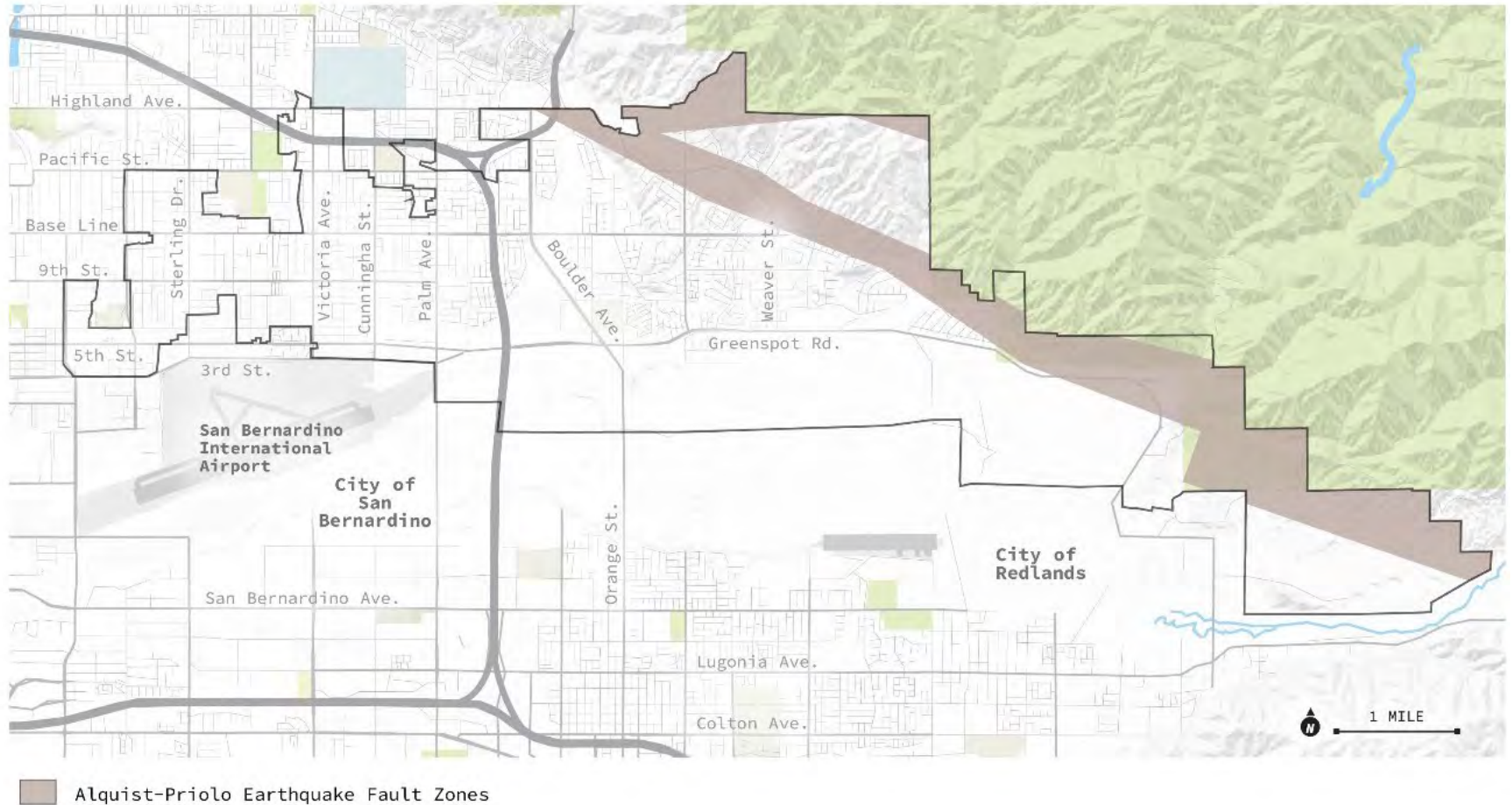
<sup>44</sup> CalFIRE. 2020. California Fire Hazard Severity Zone Viewer. <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>





**Figure 30. Flood Hazards<sup>45</sup>**

<sup>45</sup> Federal Emergency Management Agency. 2020. Flood Hazard Layer Areas. <https://www.floodmaps.fema.gov/NFHL/status.shtml>



**Figure 31. Seismic Hazards<sup>46</sup>**

<sup>46</sup> California Department of Conservation. 2015. Regulatory Maps.  
<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>

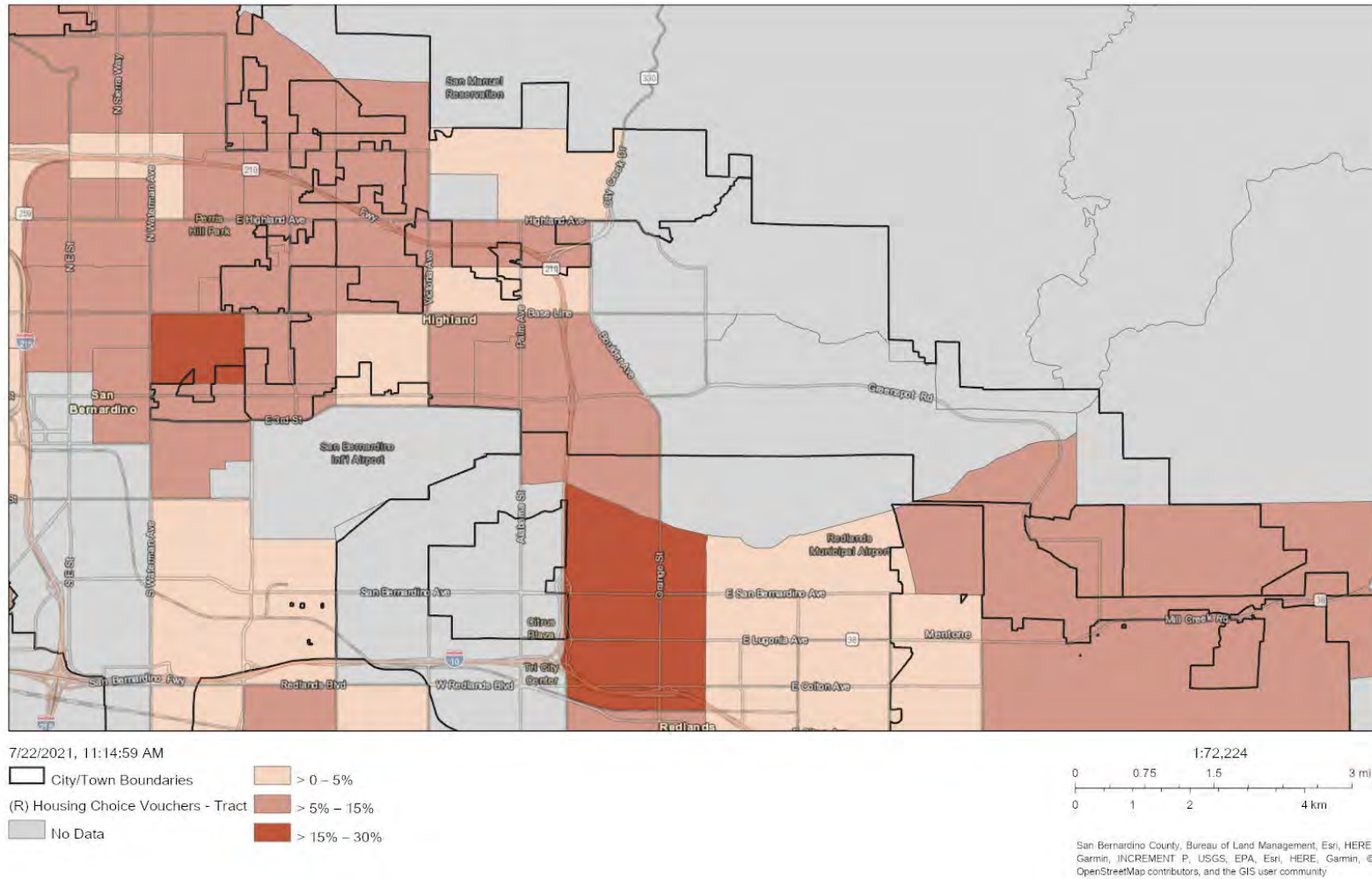
## 4.7. Other Relevant Components

### 4.7.1. Demographic Trends

In addition to the demographic trends discussed in this Fair Housing Assessment, further demographic trends regarding race, rates of homelessness, age, and population growth can be found in the Community Profile in **Appendix B, Community Profile**. Trends regarding construction, rent prices, and sale prices can be found in **Appendix C, Constraints and Zoning Analysis**.

### 4.7.2. Public Assistance

Public housing and housing choice vouchers are two ways that municipalities or Housing Authorities assist lower-income community members with obtaining affordable rents. As can be seen on **Figure 32, Housing Choice Vouchers**, most census tracts across Highland renters receiving housing choice vouchers. Multiple tracts have over 10% of renters receiving housing choice vouchers.



San Bernardino County, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © CA HCD

**Figure 32. Housing Choice Vouchers<sup>47</sup>**

<sup>47</sup> HUD. (n.d.). Affirmatively Furthering Fair Housing. HUD AFFH. <https://egis.hud.gov/affht/>.



## 5. Sites Inventory Analysis Consistency

State law, Government Code Section 65583.2(a), requires that the sites identified in inventory be analyzed with respect to the AFFH analysis to determine if the designation of sites serve the purpose of replacing segregated living patterns with balanced living patterns and transforming R/ECAP into areas of opportunity. Through the various goals, policies, and programs present within the Housing Element, the RHNA should adequately be accommodated in a manner that affirmatively furthers fair housing.

### 5.1. Improved and Exacerbated Conditions

Highland is a city that is primarily segregated with non-white populations and lower income households located largely in the western portions of the city, where Boulder Avenue acts as the dividing boundary. Today's segregated living patterns can be explained, in part, by the growth patterns of the past. Historically, Highland began as an agricultural community, consisting primarily of citrus orchards. The area west of Boulder Avenue is where Highland's earliest suburban development occurred. Initial suburbanization of the area began as early as 1943 with the establishment of the San Bernardino Army Air Depot (now San Bernardino International Airport). This early suburbanization moved east from the San Bernardino area, stopping at City Creek, which intersects Boundary Ave. Suburban development east of City Creek did not occur until much later, primarily spurred by the development of East Highlands Ranch Planned Unit Development in the 1980s. Development east of City Creek and Boundary Ave largely consist of single-family zones and planned developments on large swaths of land with few areas of commercial development. Large areas of Open Space are designated along the City's creeks and along the southern portion of Highland, east of City Creek.

Sites identified to accommodate the RHNA consists of sites both east and west of Boulder Avenue and City Creek. Due to the low-density nature of the available sites east of Boulder Avenue, those sites identified in this area are only appropriate to accommodate the moderate- and above moderate-income RHNA. Sites that qualify as meeting the criteria for the lower-income RHNA are located west of Boulder Avenue where there is the greatest access to public parks, public transportation, and commercial services. The sites identified in the Sites Inventory are displayed in **Figure 33**.

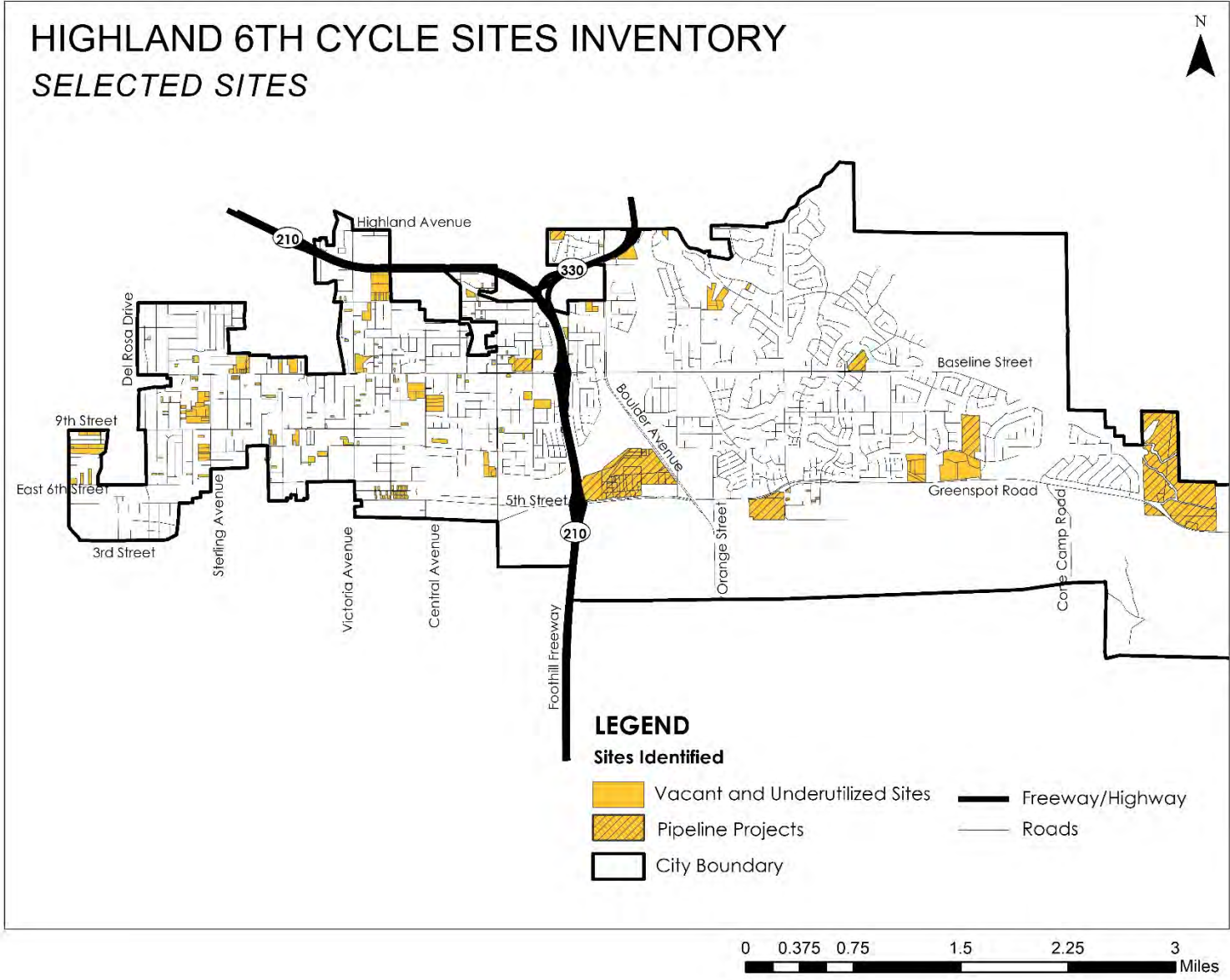


Figure 33. Sites Inventory Map

### 5.1.1. Segregation and Integration

The sites identified in the Sites Inventory to accommodate the lower-income RHNA are located in the areas of Highland that are more racially and ethnically diverse, with lower household incomes, and higher rates of children living in a single-parent home. While the identification of sites to accommodate the lower-income RHNA in this area has the potential to further exacerbate segregation, when development within these areas is paired with investments to increase opportunities for residents, affordable housing units can increase stability for households where it is needed most.

### 5.1.2. R/ECAPs

All of the sites identified in the Sites Inventory are located outside of Highland's R/ECAPs. Of the sites identified within R/ECAPs, those sites are identified to accommodate the moderate- and above-moderate income RHNA.

### 5.1.3. Disparities in Access to Opportunity

While the areas of Highland that are located west of Boundary Avenue have lower rates of positive educational outcomes and lower positive economic outcomes, positive environmental outcomes are relatively consistent throughout the City with two areas identified as having less than positive outcomes, as previously show in Section 4.5.4 of this analysis. Further, access to public transportation is highest in the areas east of Boundary Avenue which is ideal for lower earning households that have lower rates of automobile ownership.

### 5.1.4. Disproportionate Housing Needs, Including Displacement Risk

The sites identified to accommodate the lower-income RHNA are generally located in areas with higher rates of households that are financially burdened by their housing costs, higher rates of household overcrowding, and increased vulnerability to risk of displacement. The development of affordable housing in these areas could provide opportunities for increased housing security for existing residents. When lower-income residents have access to affordable housing, they are no longer at risk of sudden increases in rent. Residents with consistently affordable housing are at a lower risk of displacement due to rent increases in the area. Additionally, because affordable housing is made affordable based on household income and size, residents tend to be less burdened by the cost of housing, leaving money available for other needs.

## 6. Summary of Fair Housing Issues

The following is a list of key conclusions from this Affirmatively Further Fair Housing Analysis.

- **Racial and Economic Segregation:** Highland contains three census tracts considered as R/ECAPs. All three R/ECAP tracts have significantly higher levels of poverty than the City as a whole, with the farthest west R/ECAP having the highest poverty rate at 48.7% of the population. The west and middle R/ECAPs have nearly three times the number of renter households as ownership households, and the upper R/ECAP is has a nearly equal proportion of renters and homeowners.

The concentration of areas that are both racially and economically segregated lie in the westernmost tracts of Highland. These areas also have higher concentrations of housing cost

burden and overcrowding, lower positive outcomes related to education and economics, and have the highest concentrations of adults living alone or single female headed households.

- **Renter Housing Needs:** According to the Census, a total of 10,796 occupied units (66.9 percent) in the city were owner-occupied in 2019, while 5,342 units (33.1 percent) were renter-occupied. The renter households in Highland are primarily located in western Highland, and are have access to fewer educational, economic, and transportation opportunities. Over 80 percent of renter households experience one or more of the four severe housing problems, with higher rates of overcrowding and housing cost burden. Ozone and PM 2.5 levels are higher in western Highland, as are rates for health indicators such as asthma and diabetes. Additionally, access to opportunity for education, is higher in eastern Highland, and lower in western Highland. These differences follow school district lines, with the Redlands Unified School District census tracts scoring higher than the San Bernardino Unified School District tracts.
- **Displacement Concerns:** Western Highland is most vulnerable to displacement due to the higher levels of poverty present and lower rates of homeownership, making these residents more vulnerable to increases in rent. Additionally, flooding of Highland Creek could cause hazard-driven displacement in western Highland, causing more strain on the incomes of lower-income residents.

## Contributing Factors to Fair Housing Issues and Strategies for Affirmatively Furthering Fair Housing

An analysis of the contributing factors to fair housing issues is used to inform the strategies employed by the Housing Element for Affirmatively Furthering Fair Housing. The key fair housing issues identified through this analysis include racial and economic segregation, renter housing needs, and displacement concerns. Those factors that contribute to these issues are those which can most directly be tied to income and wealth. Factors that can contribute to a household's access to income and wealth can include poor access to upward mobility afforded by high educational outcomes, higher wage attainment, physical or developmental ability; access to affordable housing, transportation, and childcare; access to capital assets such as land ownership or homeownership; and other factors such as access to generational wealth. Many factors that can contribute to low access to income and wealth often disproportionately impact racial and ethnic minorities creating income inequality. For example, the Federal Reserve reports that data from the 2019 Survey of Consumer Finances revealed that the typical White family has eight times the wealth of the typical Black/African American family and five times the wealth of the typical Hispanic/Latino family.

Historically in the United States, housing discrimination has occurred through land use policy and zoning, mortgage lending practices, landlord or property owner decisions on rental applications, and patterns of public and private investment and disinvestment. These trends have resulted in residential segregation based on race, ethnicity, income, disability, and other characteristics, and has limited housing choices and access to opportunities for many Americans – especially for communities of color.

Land use policies and planning can help or hinder people's access to fair housing. It is both possible and desirable to adopt and implement proactive policies that will help to reverse past negative trends and achieve balanced, integrated and stable residential neighborhoods.



The City's priorities for addressing impediments to fair housing issues are identified as follows:

- **Affordable Housing.** Increased access to quality affordable housing opportunities can greatly improve opportunities for Highland's residents. The City's inclusionary housing ordinance (Program 4) will be used for the allocation of funding to support affordable housing for lower-income households. Program 5 calls for an evaluation of existing development impact fees to identify opportunities for reduced fees in exchange for affordable housing development. Other programs of the Housing Element increase coordination and collaboration with City partners to advocate for increased support in meeting the needs of lower-income households.
- **Land use and planning decisions.** Land use and planning decisions can influence and restrict needed housing opportunities. Those sites identified in **Appendix E Sites Inventory and Analysis** have been identified in those areas with close proximity to employment, education, services, and other resources. While some of the lower-income sites identified in Appendix E were previously identified in past Housing Element cycles, these areas have been determined to be the most ideal for future housing and the most realistic to be developed. Program 8 of the Housing Element creates a process by which development may be permitted by right where 20 percent or more of the units are affordable on specified sites. This program will further incentivize the production of affordable housing in areas where it is needed most.

Additionally, Housing Element Programs 16, 27, and 28 were developed to further demonstrate the City's commitment to Affirmatively Further Fair Housing through increasing fair housing awareness in the landlord tenant screening training and through resources on the City's website, continued partnership with the Inland Fair Housing and Mediation Board, and continued participation and engagement in the Regional Analysis of Impediments to Fair Housing Choice. Additional programs are focused on increasing housing access for residents.

# Appendix E: Sites Analysis and Inventory

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# 1 Introduction

As provided under California State law (Government Code Section 65583 [a][3]), a Housing Element must include an inventory of land suitable for residential development, including vacant sites that can be developed for housing within the planning period and non-vacant sites that have realistic and demonstrated potential for redevelopment during the planning period to meet the local housing need at all income levels. As further detailed in the Regional Housing Needs Allocation (RHNA) discussion in Section 2, every local jurisdiction is assigned a number of housing units representing its share of the State's housing needs for an 8-year period. The housing need of the City of Highland (City) for the 6th Cycle 8-year planning period [October 15, 2021– October 15, 2029] (6th Cycle) consists of 2,513 total units, including housing at all income levels.

This appendix (sites analysis) of the Housing Element contains an analysis and inventory of sites within the City limits that are suitable for residential development during the 6th Cycle. As presented in this analysis, the City has an adequate supply of land to fully accommodate the City's housing allocation of 1,028 lower-income units (including very-low and low-income), 471 moderate-income units, and 1,014 above moderate-income units.

This sites analysis describes the City's housing target for the 6th Cycle RHNA projection period [June 30, 2021, to October 31, 2029] (planning period), known as the RHNA; the methodology by which realistic development capacity was determined; and the approach used for the identification of sites. An overview of the existing capacity in the City is also provided, including residential projects in the pipeline with remaining entitlements or pending residential units that are anticipated in the planning period, including approved or anticipated affordability for the units in each project, followed by an analysis of vacant and underutilized sites where housing is currently an allowed use, and the projection of accessory dwelling units anticipated for the planning period.

# 2 Regional Housing Needs Allocation

Pursuant to State law, each jurisdiction in the State has a responsibility to accommodate a share of the projected housing needs in its region. The California Department of Housing and Community Development (HCD) assesses each region's housing needs and allocates a unit count (the RHNA) to each region in the state. The RHNA is mandated by State housing law as part of the periodic process of updating local Housing Elements of General Plans. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods.

As part of the assessment and allocation process, each Councils of Governments develops a methodology to determine each jurisdiction's RHNA as a share of the regional housing need provided by HCD. Each jurisdiction's RHNA is broken down by income category, ensuring that all economic groups are accommodated. The methodology generally distributes more housing, particularly lower-income housing, near jobs, transit, and resources linked to long-term improvements of life outcomes, and must further State objectives, including affirmatively furthering fair housing.

The City's share of regional housing need was determined by a methodology prepared by the Southern California Association of Governments (SCAG) as part of its Final Regional Housing Needs Assessment Allocation Plan adopted in March 2021 and updated June 2021. In accordance with the Final RHNA

Allocation Plan, the City must plan to accommodate 2,513 total housing units for the projection period beginning June 30, 2021 and ending October 15, 2029. This is equal to a yearly average of approximately 303 housing units. The 2,513 total units are split into four RHNA income categories (very low, low, moderate, and above moderate). **Table 1** provides the City’s RHNA by income category. Of the 2,513 total units, the City must plan to accommodate 619 units for very-low-income households, 409 units for low-income households, 471 units for moderate-income households, and 1,014 units for above moderate-income households between 2021 and 2029.

<b>Table 1. City of Highland RHNA 2021–2029</b>		
<b>Income Category</b>	<b>Units</b>	<b>Percent of Total</b>
Very Low Income	619	24.6%
Low Income	409	16.3%
Moderate Income	471	18.7%
Above Moderate Income	1,014	40.4%
<b>Total</b>	<b>2,513</b>	<b>100%</b>

To ensure that adequate capacity is maintained in the City throughout the 6th Cycle, additional capacity above and beyond the RHNA assigned to the City has been identified. In accordance with State requirements, the City will monitor the housing capacity identified in this sites analysis throughout the planning period to maintain sufficient capacity for the remaining RHNA at all income levels.

### 3 Vacant and Underutilized Sites Methodology and Assumptions

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and to demonstrate that sufficient land is available to provide adequate housing capacity to meet the RHNA for each income level. This section of the sites analysis describes the methodology used to calculate the housing capacity on all vacant and non-vacant developable land within the City limits that is zoned to allow for housing and available to develop within the Housing Element planning period.

#### 3.1 Process Overview

As part of the sites analysis, the City and consulting team had to identify specific sites that are suitable for residential development to determine whether there are sufficient sites to accommodate the City’s regional housing need in total and by income category. This analysis helped the City determine the programs that the City will adopt to make sites available with appropriate zoning, development standards, and infrastructure capacity to accommodate the new construction needed during the 6th Cycle (see complete infrastructure capacity discussion in the Housing Element’s **Appendix C, Constraints and Zoning Analysis**).

The sites analysis was completed using geographic information system (GIS) mapping software using multiple data sets to identify potentially available housing sites, largely depending on SCAG’s annual land use parcel-level dataset (ALU v.2019.2) available from SCAG’s open GIS data portal (last updated in June 2021). SCAG’s land use dataset provides extensive parcel-level data, including existing land uses principally based on 2019 tax assessor records.<sup>1</sup> In addition, online mapping tools, including Google Earth and Google Maps, as well as City knowledge of the current projects in the pipeline and development interest in certain areas of the City, were used to verify vacant and underutilized status and existing uses.

With the large quantities of vacant land that exist in the City, the sites analysis largely depends on those vacant sites within City limits that permit for residential development under their existing Municipal Code zoning district (zoning district). However, a small number of sites identified in the sites inventory include non-vacant, underutilized parcels. Determining which non-vacant sites are underutilized and have the strongest potential for redevelopment can help identify ideal areas for accommodating new housing through redevelopment and capitalizing on existing infrastructure. Although existing uses on non-vacant sites are considered an impediment to development, underutilized sites are identified through thorough and selective criteria to determine which existing uses are most likely to redevelop when paired with the right land use designation, regulations, and policies. As part of this identification process, an analysis of underutilized sites was conducted to determine where to prioritize Housing Element programs that aim to increase opportunities for housing development.

In addition to analyzing the existing uses and proximity to resources and existing infrastructure on each parcel, the methodology for identifying and prioritizing underutilized sites was largely based on the following factors:

- **Building Age** – Building that are 50 years or older (all but two residential buildings identified on underutilized parcels were built prior to 1971). The age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older may need minor repair. Housing over 50 years old is considered aged and more likely to generate major repairs.
- **Floor Area Ratio** – Buildings with a Floor area ratio (FAR) less than 0.15. FAR is the ratio of a building's total floor area to the size of the piece of land upon which it is built.
- **Site Size** – Parcels greater than 0.5 acres or less than 10 acres, or smaller parcels with the potential for lot consolidation resulting in a site greater than 0.5 acres. Development of housing affordable to lower-income households on parcels that are smaller than one half acre or larger than 10 acres is not typically considered realistic or feasible.

While a number of nonvacant sites identified to be underutilized have existing residential uses, none of the underutilized sites are known to have been occupied in the past 5 years with housing occupied by lower-income residents. In addition, the existing units on the sites were subtracted from the realistic capacity to calculate the net-new units, and only net-new units were ultimately accounted for toward accommodating the City’s RHNA (see **Table 10**).

---

<sup>1</sup> Sources of 2019 existing land use: SCAG\_REF – SCAG’s regional geospatial datasets; ASSESSOR – Assessor’s 2019 tax roll records; CPAD- California Protected Areas Database (version 2020a; accessed September 2020); CSCD – California School Campus Database (version 2018; accessed September 2020); FMMP – Farmland Mapping and Monitoring Program’s Important Farmland GIS data (accessed September 2020); MIRTHA – U.S. Department of Defense’s Military Installations, Ranges, and Training Areas GIS data (accessed September 2020).

All parcels included in the sites inventory were reviewed for any known environmental constraints; the sites included in the inventory have all been designated for residential development and are not constrained by known site-specific constraints that would limit development. Parcels that were identified as having absolute constraints<sup>2</sup> were removed from the inventory.

Land suitable for residential development must be appropriate and available for residential use in the planning period. As such, the sites were also reviewed according to their development standards and regulations, and to recently approved or built residential projects in the same designations where housing is an allowed use.

## 3.2 Density and Affordability Assumptions

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate that the projected residential development capacity of the sites identified in the Housing Element can realistically be achieved. This realistic capacity may use established minimum densities to calculate the housing unit capacity. The sites analysis estimated realistic capacity as shown in **Table 2, Density Assumptions by Zone**. As a conservative estimate of capacity calculations, the sites analysis estimated realistic capacity based on the minimum permitted density of 20 dwelling units per acre in the City's R-4 zone for sites identified to accommodate the City's lower-income RHNA. This does not limit the ability of a project to be built at the higher densities allowed under either the zoning or the General Plan. Furthermore, it is expected that property owners will strive for densities above the minimums, assuming developers can earn greater profits for construction on the same parcel of land. Sites identified to accommodate the City's RHNA with pending projects have been calculated based on their approved or expected densities and affordability (see Section 4.1, Planned, Approved, and Prospective Projects, for a detailed overview of residential development in the pipeline).

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<sup>2</sup> Per Connect SoCal's Sustainable Communities Strategy Technical Report's (adopted 3, 2020) areas identified to avoid placement of future growth, including absolute constraints such as preserved land where growth has been reduced and redirected, as well as variable constraints where growth could be avoided if possible.



**Table 2. Density Assumptions by Zone**

Zoning District	Maximum Density (dwelling units per acre)	Realistic Density (units per acre)	Income Level
R-4 (Multifamily District)	30	20	Lower
R-3 (Multifamily District)	18	12	Moderate
MU (Mixed Use District)	18	12	Moderate/ Above Moderate
R-2 (Two-Family District)	12	8	Moderate
R-2C (Corridor Residential District)	9	6	Moderate
R-1 (Single-Family District)	6	4	Above Moderate
VR (Village Residential District)	6	4	Above Moderate
EHV (East Highland Village District)	6	4	Above Moderate
A/EQ (Agricultural Equestrian District)	2	2	Above Moderate
PD (Planned Development District) <sup>1</sup>	Varies <sup>2</sup>	Varies	Moderate/ Above Moderate
Greenspot Village & Marketplace (SPR-006-001)	Planning Area 2: 30 Planning Area 3: 40 <sup>3</sup>	Varies <sup>3</sup>	Lower/ Moderate / Above Moderate

Source: City of Highland Municipal Code, Title 16 Land Use and Development, 2021.

1. The maximum overall intensity of areas designated Planned Development shall be consistent with the provisions of the Highland General Plan or determined through the development review process. Development within areas designated Planned Development are processed using a specific plan pursuant to Government Code Section 65450, a planned unit development, a conditional use permit or a similar device.

2. Per the City of Highlands General Plan Land Use Element, Densities for Planned Development areas vary and typically range from 4.6 to 12.0 dwelling units per acre.

3. See Section 4.1.1, Greenspot Village & Marketplace Specific Plan.

### 3.2.1 Lower-Income Sites

In accordance with Housing Element law (Government Code Section 65583.2[c][3]), the City’s default density for lower-income sites must permit at least 30 dwelling units per acre. Further, it is detailed under State guidance that sites that are too small or too large may not facilitate developments of this income level, so sites have been limited to those between 0.5 and 10 acres. Generally, a site is a parcel or a group of parcels that can accommodate a portion of the jurisdictions RHNA. Parcels less than half an acre that have been included in the lower-income sites inventory are anticipated to be consolidated into one site and have been clearly marked (see note in **Table 11**).

The City has one zoning district that permits densities of 30 dwelling units per acre: the R-4, Multifamily District. Sites identified in this zoning district, were included in the inventory as lower-income sites. In addition, the City currently has a Residential High Density Special Overlay (HDS) which permits densities of at least 20 but not greater than 30 units per acre. However, the 52-acre HDS Overlay is now located entirely within the 104-acre Greenspot Village & Marketplace Specific Plan (Specific Plan). The Specific Plan, which was adopted in 2013 (SPR-006-001 Greenspot Village & Marketplace), allows a density range of 18 to 40 dwelling units per acre. As such, the sites analysis relied on the development standards of

the Specific Plan in lieu of the HDS Overlay, and the sites identified in the Specific Plan zoning designation were included in the inventory for all three income categories: lower-, moderate-, and above moderate-income as detailed in Section 4.1.1, Greenspot Village & Marketplace Specific Plan.

### 3.2.2 Moderate-Income Sites

Primarily vacant sites in the R-3 (Multifamily District), MU (Mixed Use District), R-2 (Two-Family District), and R-2C (Corridor Residential District) districts were inventoried at the moderate-income level based on each zoning district's permitted uses and maximum densities ranging from 9 to 18 dwelling units per acre. All four zoning districts provide opportunities for a range of housing choices at medium densities. As such, all sites identified within the designations were inventoried at the moderate-income level. In addition, select sites in the PD (Planned Development District) and Greenspot Village & Marketplace (SPR-006-001) zoning districts were identified as having the capacity to accommodate moderate-income sites.

### 3.2.3 Above Moderate-Income Sites

Primarily vacant sites in the R-1 (Single-Family District), VR (Village Residential District), EHV (East Highland Village District), and A/EQ (Agricultural Equestrian District) districts were inventoried at the above moderate-income level based on each zoning district's permitted uses and maximum densities ranging from 2 to 6 dwelling units per acre. All four zoning districts provide opportunities for a range of housing choices at low densities. As such, all sites identified within the designations were inventoried at the above moderate-income level. In addition, based on the unit count and affordability expected for projects in the pipeline, one site in the MU zoning district, and select sites in the PD (Planned Development District) and Greenspot Village & Marketplace (SPR-006-001) zoning districts were identified as having the capacity to accommodate above moderate-income sites.

## 3.3 Sites Identified in Previous Housing Elements

Per the statute (Government Code Section 65583.2[c]), a non-vacant parcel identified in a previous planning period and a vacant parcel that has been included in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the parcel is subject to a program in the Housing Element to allow residential use by right for housing developments in which at least 20% of the units are affordable to lower-income households.

30 of the parcels identified in the 2021 Housing Element for lower-income housing were included in a previous Housing Element (see **Table 11** for individual site and parcel details). Housing Element Program 8 commits the City to permit the development of housing by right on these parcels where 20 percent of the total units in the development will be affordable to lower-income households, consistent with AB 1397 (2017).

## 4 Existing Capacity

The following is a description of planned, approved, or prospective projects expected to be completed within the planning period, and the residential capacity on vacant and underutilized sites within each zoning district permitting residential uses. **Figure 1, City Overview of Sites Inventory**, provides an overview of the existing capacity identified in the sites inventory. The vacant and underutilized sites identified in **Figure 1** are the vacant and nonvacant sites which have been included in the sites inventory. It is not a comprehensive inventory of all vacant and underutilized sites in the City.

# HIGHLAND 6TH CYCLE SITES INVENTORY

## SELECTED SITES

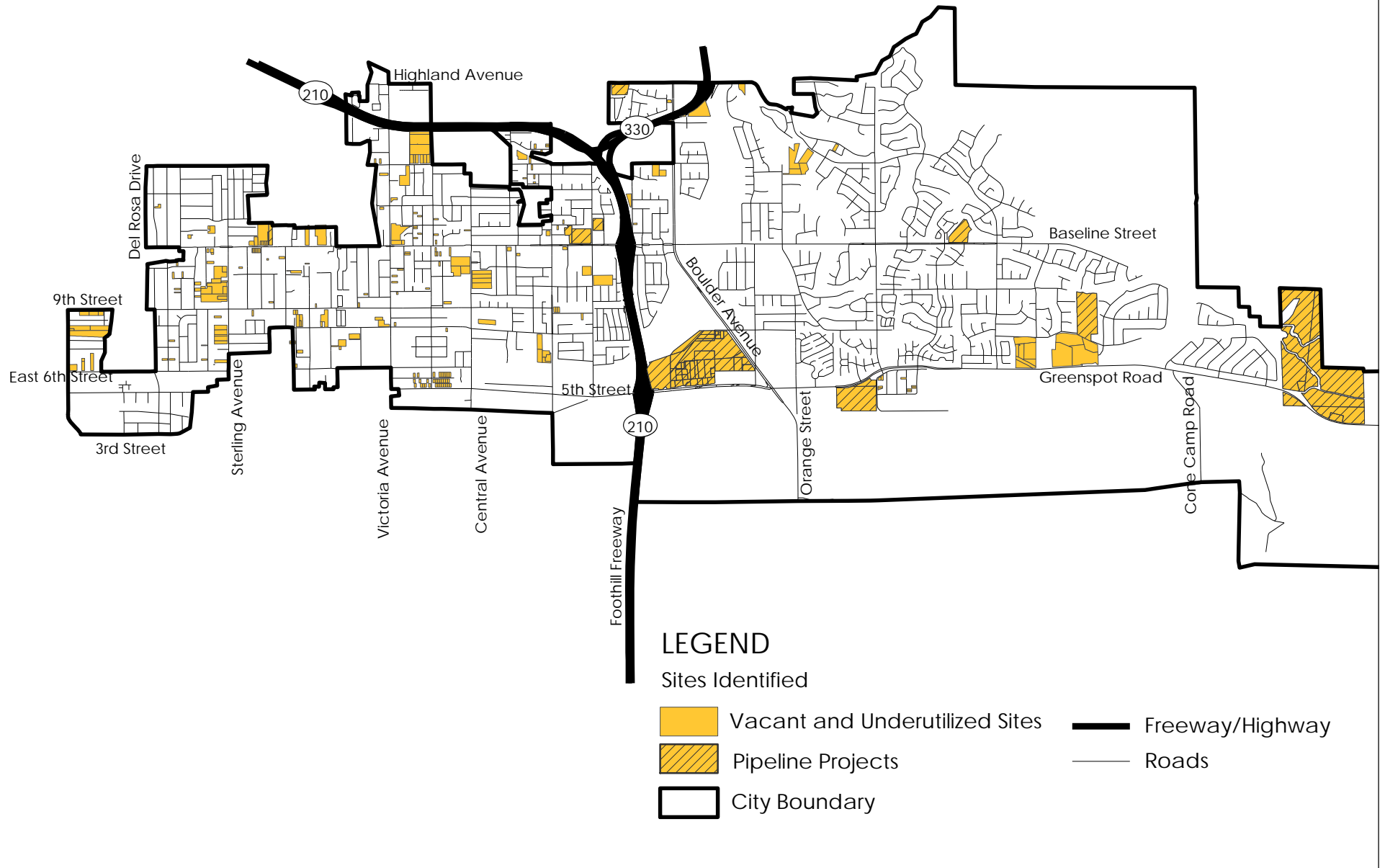
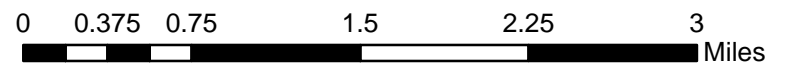


Figure 1. City Overview of Sites Inventory



## 4.1 Planned, Approved, and Prospective Projects

Several development projects in the pipeline are seeking entitlements or actively pursuing construction, or have prospective development expected to be built within the planning period. **Table 3, Summary of Pipeline Residential Development**, summarizes the current inventory of nine residential projects included in the sites inventory with active entitlements or under review, or with prospective development, and expected to be built within the planning period. **Figure 2, Pipeline Residential Projects**, provides an overview of the nine residential projects in the pipeline included in the sites inventory. As of August 2021, there were an estimated 1,313 housing units in the pipeline that are counted toward meeting the 6th Cycle RHNA. There are a number of other projects in the City with residential units, such as single-unit developments, that have not been included in this analysis but are expected to be completed during the planning period.

Table 3. Summary of Pipeline Residential Development				
Project	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
Total Pipeline Residential Development Credited Toward RHNA	200	250	863	1,313
Source: City of Highland				

See sites 233-243 in **Table 11** for individual site and parcel details.

### 4.1.1 Greenspot Village & Marketplace Specific Plan

The Greenspot Village & Marketplace Specific Plan is a master-planned, mixed-use development located within the area identified in the City's General Plan Land Use Element as the "Golden Triangle Community Policy Area," and the City's zoning designation SPR-006-001. The Specific Plan proposes three Planning Areas with two development scenarios, depending on whether the approximately 21-acre parcel currently owned by San Bernardino County Flood Control District property is included as part of the development. Under both scenarios Planning Area 1 would consist of commercial uses, Planning Area 2 of residential uses, and Planning Area 3 of mixed-uses. The total number of dwelling units may not exceed 800; within that limit, dwelling units may be transferred between Planning Areas 2 and 3. Planning Areas 2 and 3 would include density ranges of 20 to 30 dwelling units per acre and 18 to 40 dwelling units per acre, and permit a maximum of 500 to 700 dwelling units and 100 to 300 dwelling units, respectively.

#### 4.1.1.1 Planning Area 2

Planning Area 2 is envisioned for high density residential villages and open space and permits a minimum 20 and up to 30 dwelling units per acre and allows single-family detached and attached housing including townhomes, duplexes, and small to large multiple-family attached structures. The planning area permits between 500 to 700 dwelling units so long as the total dwelling unit count for the overall Specific Plan area does not exceed 800 dwelling units. Due to the permitted densities and range in housing types, and vacant land available, the sites inventory expects housing to be developed at a mix of income levels, including 100 lower-income units and 200 moderate-income units.

In addition, 200 market-rate attached single-family and multi-family units are expected to be developed by TREH Partners as part of an approximately 19.8-acre mixed-use project (Parcels 1201-331-01, 1201-341-01, 1201-341-08, and 1201-341-09). As of August 2021, City Council approved a Design Review Application (DRA No. 20-012) for the construction of approximately 85,316 square feet of commercial uses (Greenspot Crossings) within Planning Area 1 and a 200 attached residential unit complex with a 6,214 square-foot clubhouse in Planning Area 2; and a Tentative Parcel Map (TPM No. 20-002) to increase the number of parcels from four parcels to eight parcels. The 200 units will be built on an 8.79-acre pad for an average density of approximately 22.75 dwelling units per acre, and they have been included in the sites inventory as above-moderate income units.

#### 4.1.1.2 Planning Area 3

Planning Area 3 is envisioned for a mix of residential, retail, office, and commercial uses and permits a minimum 18 and up to 40 dwelling units per acre. The planning area permits between 100 and 300 dwelling units so long as the total dwelling unit count for the overall Specific Plan area does not exceed 800 dwelling units. There is currently one active project in Planning Area 3, the San Carlo Apartments. The San Carlo Apartments project is a 200-unit market rate town home development on Greenspot Road, being built by Rexco Development at an approximate density of 18 dwelling units per acre. The residential project, entitled in 2020, is located on 10.85 acres on the southern portion of Planning Area 3 and was finishing their construction plan check and process for their grading permits in March 2021. As such, the 200 units have been excluded from the sites inventory, leaving a remaining capacity of 100 units permitted in Planning Area 3. Based on the permitted densities and range in housing types, and vacant land available, the 100 units have been included in the sites inventory as having the capacity to accommodate lower-income sites.

#### 4.1.2 Mediterra

Mediterra is a Planned Development community (PD 13-001) off Greenspot Road on the far eastern side of the City. The project includes 8 Planning Areas which allow for a low density residential development of 200 residential lots (2.1 to 6 dwelling units per acre), a medium density development of 110 residential units (6.1 to 12 dwelling units per acre), six estate lots (0 to 2 dwelling units per acre), and several lettered lots containing two parks, landscaping and a water quality management basin on approximately 178 gross acres. As of August 2021, a Design Review Application (DRA-21-007) was submitted to the City for Vista Verde at Mediterra by D.R. Horton for the construction of a 149 single-family home community, a public park, public trails, a private common area, a private community pool, and recreation center within Phases 1 and 2 of the Mediterra Planned Development (Parcels 0297-021-25, 0297-021-26, 0297-021-27 and 0297-021-28). The 149 single-family units in Vista Verde at Mediterra have been included in the sites inventory as above-moderate income units. The remaining 167 dwelling units that are expected to be completed in the community have been included in the sites inventory as moderate- and above-moderate income units based on the ranging low and medium densities permitted (See **Table 4**).

#### 4.1.3 Blossom Trails

Blossom Trails is a residential housing development in East Highlands Ranch on the southwest corner of Church Street and Greenspot Road, which will include 137 single-family units on approximately 25.5 acres (Parcels 1201-401-02 and 1201-431-61) at an approximate density of 5.4 dwelling units per acre. The City adopted the development's Tentative Tract Map (TTM 17-001, No. 20090) and Tentative Parcel

Map (TPM 17-002, No. 19958) in March 2018. The 137 units are expected to be completed during the planning period and have been included in the sites inventory as above-moderate income units.

#### 4.1.4 Highland Park

Highland Park is a Planned Development community on the north side of Base Line Street in the eastern side of the City. The project has received a Tentative Tact Map (TTM 19915), which received an extension of 18 months under Assembly Bill No. 1561 but has not received building permits as of June 2021. The site is approximately 7.9 acres and will include 46 single-family market-rate residential units and a neighborhood park, at an approximate density of 6 dwelling units per acre. The 46 units are expected to be completed during the planning period and have been included in the sites inventory as above-moderate income units.

#### 4.1.5 Crestwood Communities

Crestwood Communities is planned to accommodate 49 market-rate, attached condominiums within 12 two-story buildings, associated landscaping, active and passive recreation amenities, and parking. The City approved a Tentative Tract Map (TTM 18-002, No. 20190) for a Planned Development on approximately 4.2 acres (Parcel 1200-041-02) in 2018 at an approximate density of 12 dwelling units per acre. The 49 units are expected to be completed during the planning period and have been included in the sites inventory as above-moderate income units.

#### 4.1.6 Other Pending Projects

Other pending projects which have been included in the Sites Inventory include:

##### **Kiel 54 at 29996 Santa Ana Canyon Road (Parcel 1210-371-51)**

- 54 single-family homes on approximately 21.6 acres at a density of approximately 2.5 dwelling units per acre. A Tentative Tract Map was approved by the City (TTM 018-001, No. 20142) in 2018. The 54 units are expected to be completed during the planning period and have been included in the sites inventory as above-moderate income units.

##### **Senior Assisted Living Facility (Parcels 1191-181-01 and 1191-191-06)**

- 60 units entitled by the City in 2018 (Resolution 2018-008). The site is located on Base Line Street east of Sterling Avenue next to the Mountain Breeze Villas, a 168-unit affordable housing apartment complex. The 60 units are expected to be completed during the planning period on approximately 2 acres at a density of approximately 30 dwelling units per acre and have been included in the sites inventory as above-moderate income units.

##### **Tractor Supply Co. Project (Parcels 1200-381-43 and 1200-381-05)**

- A mixed-use project planned to include 15 market-rate multifamily units and 2 single-family homes, a Tractor Supply Site store, retail space, and a fast-food drive through restaurant on approximately 9.1 acres. The proposed project is being developed by Woodcrest Real Estate Ventures and is located at the intersection of Base Line Street and Church Avenue. As of August 2021, the City had received the project's Design Review Application (DRA-21-004). Construction is expected to begin in 2022 and be completed one year later. The 23 units have been included in the sites inventory as above-moderate income units.

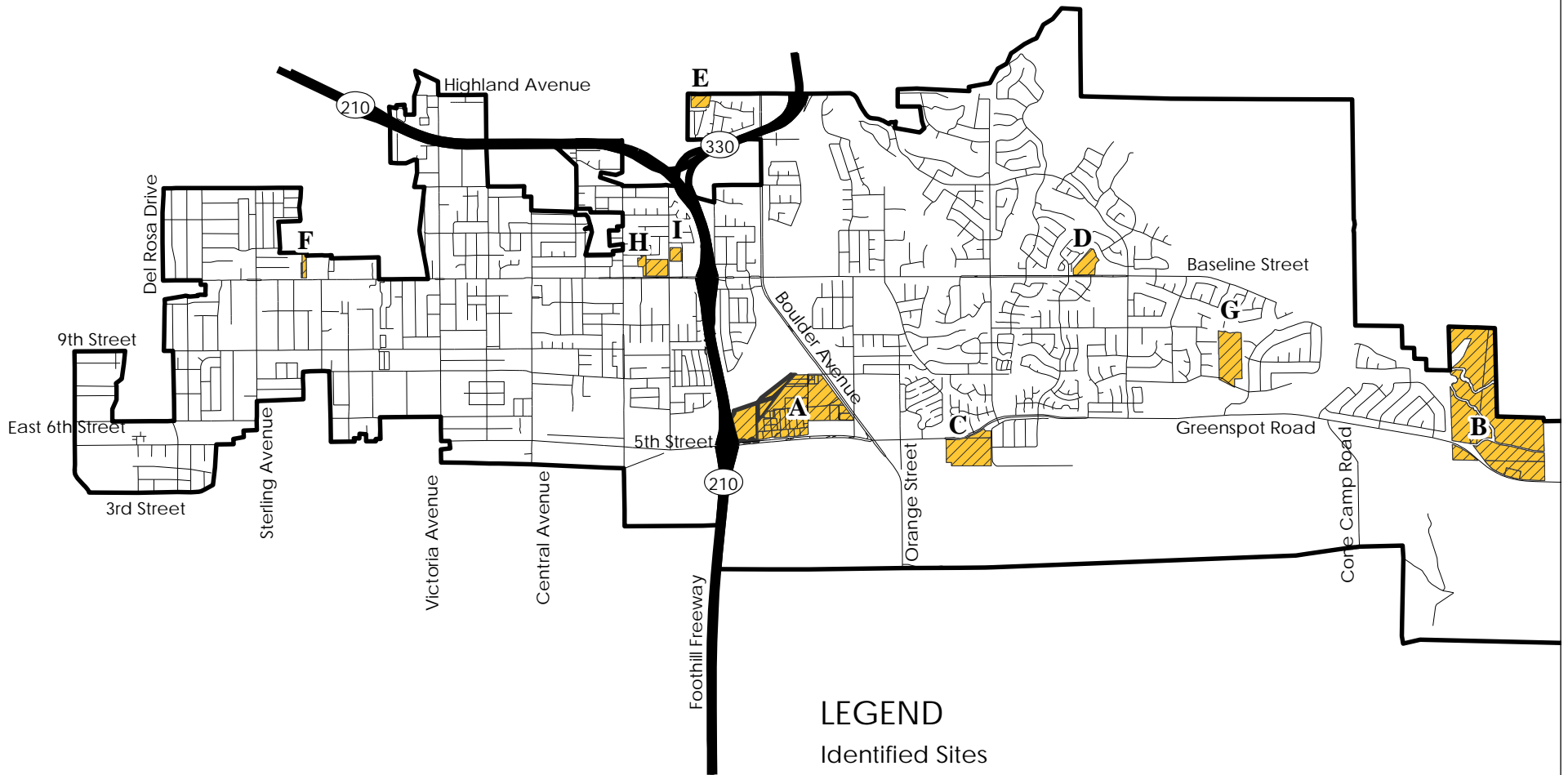
**Paseo Del Oro (Parcel 1200-421-34)**

- 34 small-lot single family homes on approximately 2.9 acres at a density of approximately 12 dwelling units per acre. As of August 2021, the project has been entitled by the City, but has not received permits. The project is located across from the Tractor Supply Co. project on Base Line Street and Church Avenue. The 34 units are expected to be completed during the planning period and have been included in the sites inventory as above-moderate income units.

**Table 4, Pipeline Residential Development Credited Toward RHNA**, provides a detailed overview of the current inventory of nine residential projects included in the sites inventory with active entitlements or under review, or with prospective development, and expected to be built within the planning period

<b>Table 4. Pipeline Residential Development Credited Toward RHNA</b>					
Corresponding Map ID (See Figure 2)	Project	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units Credited Toward RHNA
A	Greenspot Village & Marketplace Specific Plan (including TREH Partners project)	200	200	200	600
B	Mediterra	—	50	266	316
C	Blossom Trails	—	—	137	137
D	Highland Park	—	—	46	46
E	Crestwood Communities	—	—	49	49
F	Senior Assisted Living Facility	—	—	60	60
G	Kiel 54	—	—	54	54
H	Tractor Supply Co.	—	—	17	17
I	Paseo Del Oro	—	—	34	34
<b>Total Units</b>		<b>200</b>	<b>250</b>	<b>863</b>	<b>1,313</b>
Source: City of Highland					

# PIPELINE RESIDENTIAL DEVELOPMENT SITES

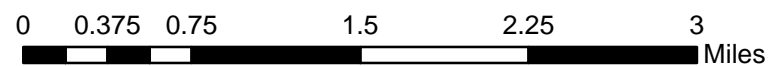


## LEGEND

- Identified Sites
- Pipeline Projects
- Freeway/Highway
- City Boundary
- Roads

Note: Please refer to Table 4, Pipeline Residential Development Credited Toward RHNA, for corresponding Map ID and project details.

Figure 2. Pipeline Residential Projects





## 4.2 Lower-Income Sites

In addition to the 200 lower-income units identified in the Greenspot Village and Marketplace Specific Plan, the City has identified capacity for 1,128 lower-income units on vacant and underutilized sites. With a total of 1,328 lower-income units, the City has identified an adequate supply of land to accommodate the City’s housing allocation of 1,028 lower-income units (including 619 very-low and 409 low-income units), as well as a buffer, as required to accommodate the RHNA throughout the planning period.

All 1,128 units on vacant and underutilized sites identified as having the capacity to accommodate lower-income units are located on sites in the Multifamily (R-4) zoning district. The R-4 zoning district provides for the development of multifamily attached residential dwelling units with enhanced amenities (common open space and recreation areas) at a minimum density of 20 DUs per gross acre and a maximum density of 30 DUs per gross acre. Approximately 69 acres of the City are in the R-4 designation. However, only parcels or consolidated sites (sites can be made up of single parcels, or two or more parcels which are anticipated to be consolidated and developed into a single site) greater than 0.5 acres or less than 10 acres have been included in the sites inventory. Based on the permitted density and range of permitted multifamily residential uses and neighborhood-serving amenities, the sites have been identified as appropriate to accommodate lower-income housing.

Based on a realistic residential development potential of 20 dwelling units per acre in the R-4 zone, a total of 31 sites (including 3 consolidated sites) with 1,128 units on approximately 57 total acres have been included in the sites inventory. **Table 5** provides a summary of all vacant and underutilized lower-income sites in the R-4 zoning district identified in the sites inventory, including 22 vacant parcels and 16 underutilized parcels making up a total 31 sites. All but 2 of the underutilized parcels identified have structures built over 55 years ago, and the average year of construction for all underutilized parcels is 1949. While many of the underutilized sites have existing residential uses, the majority are single-family homes with one residential unit on large parcels, and the average floor-area-ratio for all underutilized parcels included is 0.04.

See **Figure 3, Lower-Income Sites**, for an overview of lower-income sites. The vacant and underutilized sites identified in **Figure 3** are vacant and nonvacant sites which have been included in the sites inventory. It is not a comprehensive inventory of all vacant and nonvacant sites in the R-4 zoning designation.

Table 5. Lower-Income Sites Summary							
Vacant Parcels	Underutilized Parcels	Total Sites	Total Acreage	Maximum Units Permitted	Realistic Capacity (Total Units)	Total Net- New-Units	Income Level
22	16	31	56.6	1,698	1,128	1,104	Lower- Income

See sites 1-31 in **Table 11** for individual site and parcel details.

# LOWER-INCOME SITES

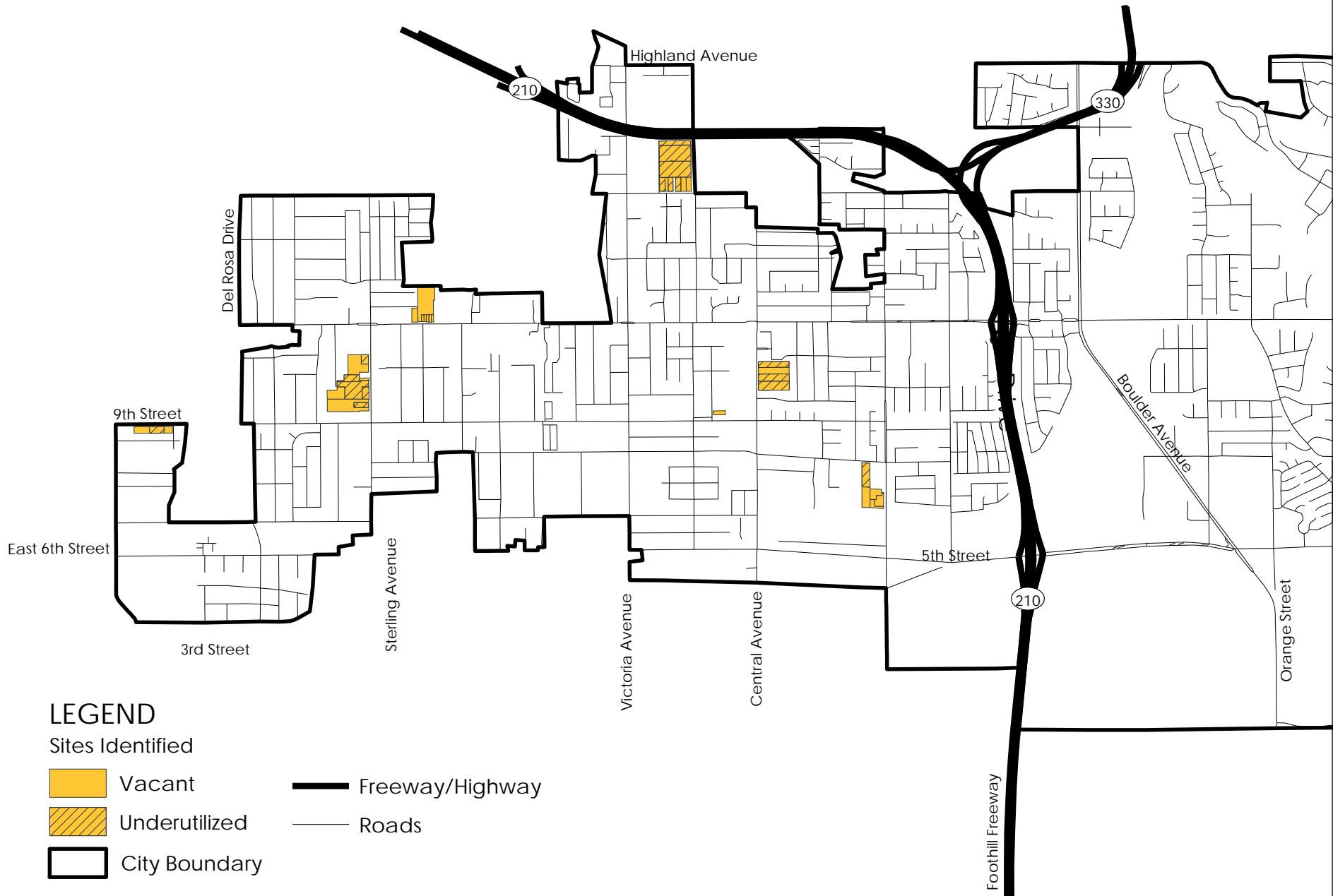
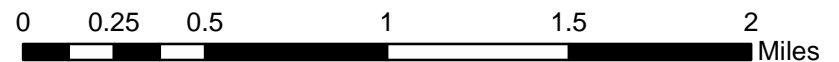


Figure 3. Lower-Income Sites



### 4.3 Moderate-Income Sites

In addition to the 250 moderate-income units identified in Section 4.1, the City has identified capacity for 257 moderate-income units on vacant and underutilized sites. With a total of 507 moderate-income units, the City has identified an adequate supply of land to accommodate the City's housing allocation of 471 moderate-income units.

The 257 units on vacant and underutilized sites identified as having the capacity to accommodate moderate-income units are located on sites in the Multifamily (R-3), Mixed Use (MU), Two-Family (R-2), Corridor Residential (R-2C), and Planned Development (PD) zoning districts. The R-3 zoning district provides for the development of multifamily attached residential dwelling units with enhanced amenities (common open space and recreation areas) at a maximum allowable density of 18 dwelling units per acre. The MU zoning district provides opportunities for an integrated mix of residential, retail, service, civic, entertainment and office opportunities in attached or detached structures, developed as a single project or multiple related projects at a maximum allowable residential density of 18 dwelling units per acre. The R-2 District provides for residential development including small lot single-family detached, single-family attached, and multifamily residential uses and mobilehomes, at a maximum allowable density of 12 dwelling units per acre. The R-2C District provides for small lot single-family detached, single-family attached, and multifamily residential uses at a maximum allowable density of nine dwelling units per acre. Based on the permitted densities and range of permitted residential uses and neighborhood-serving amenities, the sites have been identified as appropriate to accommodate moderate-income housing.

Approximately 172 acres of the City are in the R-3, MU, R-2, or R-2C zoning designations. However, approximately 130 acres have existing, multifamily residential uses. As such, the sites analysis largely focuses on the remaining vacant parcels. In addition, five moderate-income sites were identified on parcels in the PD zoning designation. Based on the realistic residential development potentials included in **Table 2**, Density Assumptions by Zone, a total of 35 sites with 257 units on approximately 28.5 total acres have been included in the sites inventory. **Table 6** provides a summary of all vacant and underutilized moderate-income sites in the R-3, MU, R-2, R-2C, and PD zoning designations identified in the sites inventory, including 30 vacant parcels and 5 underutilized parcels making up a total 35 sites. All of the underutilized parcels identified have structures built over 70 years ago, and the average year of construction for all underutilized parcels is 1936. Although four of the underutilized sites have existing residential uses, only one of the sites has two dwelling units and the other three have single-family homes with single dwelling units on large parcels, and the average floor-area-ratio for all underutilized parcels included is 0.03.

See **Figure 4, Moderate-Income Sites**, for an overview of moderate-income sites. The vacant and underutilized sites identified in **Figure 4** are vacant and nonvacant sites which have been included in the sites inventory. It is not a comprehensive inventory of all vacant and nonvacant sites in the R-3, MU, R-2, R-2C, and PD zoning designations.

Table 6. Moderate-Income Sites Summary							
Vacant Parcels	Underutilized Parcels	Total Sites	Total Acreage	Maximum Units Permitted	Realistic Capacity (Total Units)	Total Net- New-Units	Income Level
30	5	35	28.5	356	257	252	Moderate- Income

See sites 32-66 in **Table 11** for individual site and parcel details.

# MODERATE-INCOME SITES

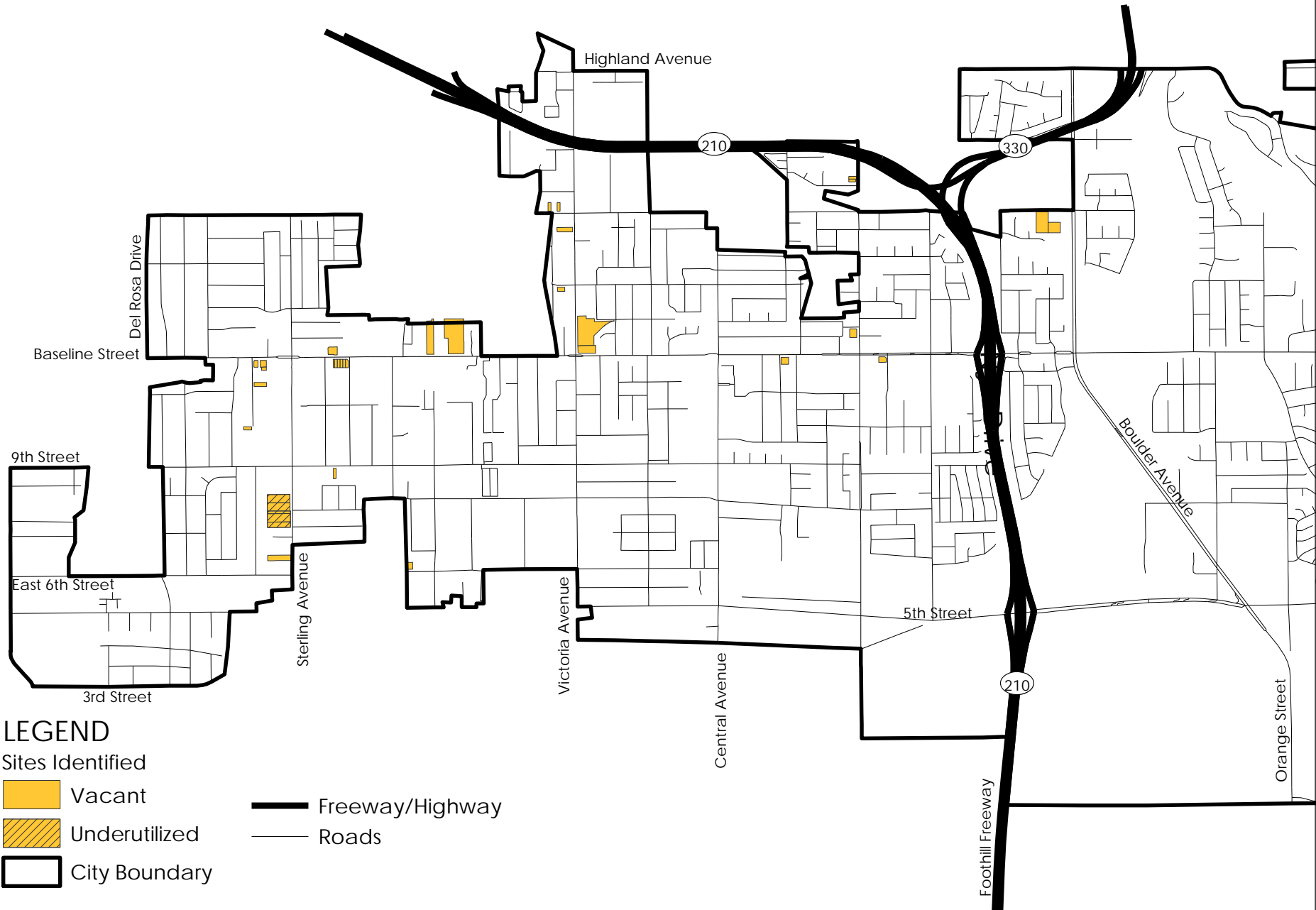
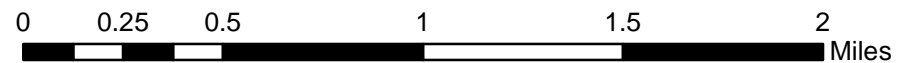


Figure 4. Moderate-Income Sites



## 4.4 Above Moderate-Income Sites

In addition to the 863 above moderate-income units identified in Section 4.1, the City has identified capacity for 561 moderate-income units on vacant and underutilized sites. With a total of 1,427 above moderate-income units, the City has identified an adequate supply of land to accommodate the City's housing allocation of 1,014 above moderate-income units.

The 561 units on vacant and underutilized sites identified as having the capacity to accommodate above moderate-income units are located on sites in the Single-Family (R-1), Village Residential (VR), East Highland Village District (EHV), and Agricultural Equestrian District (A/EQ) zoning districts.

The R-1 zoning district provides for the development of single-family residential, small lot single-family detached, and mobilehomes at a maximum allowable density of six dwelling units per acre. The VR zoning districts is intended to preserve and enhance the character of the historic townsite, while permitting new development and the rehabilitation and reuse of existing structures at a maximum allowable density of six dwelling units per acre. The EHV zoning district provides for small lot single-family residential detached housing with a maximum allowable density of six dwelling units per acre. The A/EQ zoning district provides for development of low density, large lot, single-family detached residential dwelling units at a maximum allowable density of two dwelling units per acre. Based on the lower-densities and residential uses permitted, the sites have been identified as appropriate to accommodate above moderate-income housing.

The sites analysis largely focuses on vacant parcels in the R-1, VR, EHV, and A/EQ zoning designations. In addition, one above moderate-income site was identified on a parcel in the PD zoning designation. Based on the realistic residential development potentials included in **Table 2**, Density Assumptions by Zone, a total of 166 sites with 561 units on approximately 135 total acres have been included in the sites inventory. **Table 7** provides a summary of all vacant and underutilized above moderate-income sites in the R-1, VR, EHV, A/EQ, and PD zoning designations identified in the sites inventory, including 161 vacant parcels and 5 underutilized parcels making up a total 166 sites. Only one of the underutilized parcels has a residential unit, which was built in 1952 and has an FAR of 0.01. In addition, all five underutilized parcels are being considered by the City for a rezone. While the rezone is not part of the Housing Element, the City is separately considering rezoning sites 150-152 and 220-230 identified in the sites inventory from their current R-1 zoning designation to a PD zoning designation to provide a greater degree of design and land use flexibility for future development opportunities.

See **Figure 5, Above Moderate-Income Sites**, for an overview of above moderate-income sites. The vacant and underutilized sites identified in **Figure 5** are vacant and nonvacant sites which have been included in the sites inventory. It is not a comprehensive inventory of all vacant and nonvacant sites in the R-1, VR, EHV, A/EQ, and PD zoning designations.

Table 7. Above Moderate-Income Sites Summary							
Vacant Parcels	Underutilized Parcels	Total Sites	Total Acreage	Maximum Units Permitted	Realistic Capacity (Total Units)	Total Net- New-Units	Income Level
161	5	166	135.3	788	561	560	Above Moderate- Income

See sites 67-232 in **Table 11** for individual site and parcel details.

# ABOVE MODERATE-INCOME SITES

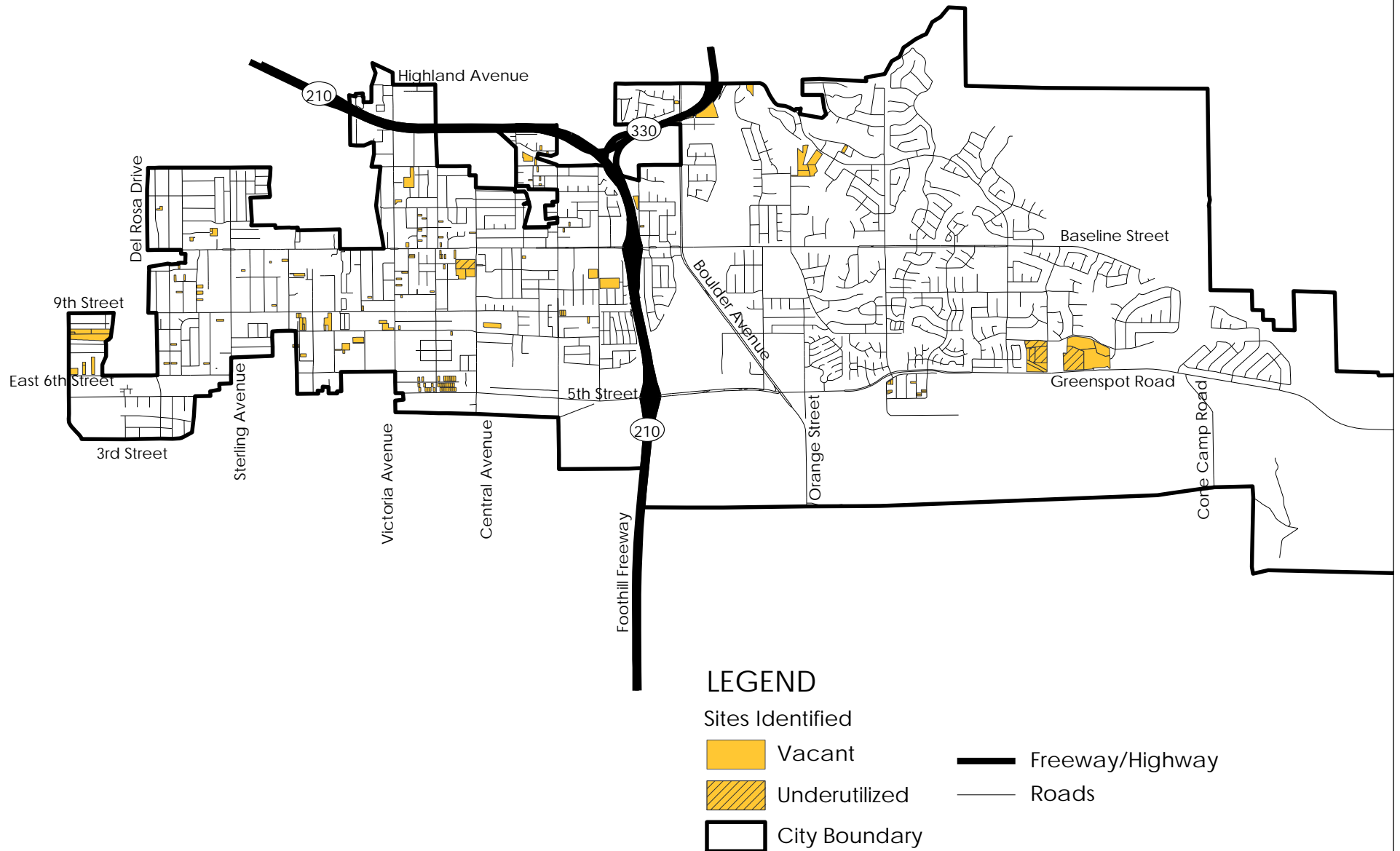
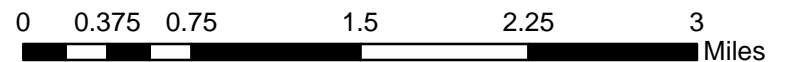


Figure 5. Above Moderate-Income Sites





## 4.5 Accessory Dwelling Unit Projection

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) to be developed within the planning period. The number of ADUs and JADUs that can be credited toward potential development must be based on the following factors:

- ADU and JADU development trends since January 2018
- Community need and demand for ADUs and JADUs
- Resources and incentives available to encourage their development
- The availability of ADUs and JADUs for occupancy
- The anticipated affordability of ADUs and JADUs

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these units in cities across California. ADU and JADU production is an ideal strategy for producing needed housing while capitalizing on existing infrastructure, such as water and sewer. Additionally, this is often a strategy that is more easily accepted by stakeholders who may be resistant to change because these units provide a form of “unseen” density that is palatable to many.

Between 2018 and 2020, 8 ADUs were permitted in the City. **Table 8** details recent ADU and JADU development in the City.

Year	Permitted Units
2018	3
2019	2
2020	5

Source: City of Highland, 2021. Permit Listing Activity Report, 2018-2020.

Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue upward. To account for this increased potential, this sites analysis used the trends in ADU construction since January 2018 to estimate new production, which averages 2.66 ADUs per year. Based on the local incentives and ADU and JADU trends since January 2018, a conservative estimate of the number of units to be produced under this approach is 4 units each year during the planning period (June 30, 2021, to October 31, 2029), for a total of 33 units.

In addition to calculating the expected number of ADUs and JADUs to be developed within the planning period, the sites analysis must calculate the anticipated affordability of ADUs and JADUs to determine which RHNA income categories they should be counted toward. To facilitate the ADU affordability assumptions for jurisdictions, SCAG conducted the SCAG Regional Accessory Dwelling Unit Affordability Analysis.<sup>3</sup> As part of the analysis, SCAG conducted a survey of rents of 150 existing ADUs from April

<sup>3</sup> SCAG (Southern California Association of Governments). 2020. “SCAG Regional Accessory Dwelling Unit Affordability Analysis.” [https://scag.ca.gov/sites/main/files/file-attachments/adu\\_affordability\\_analysis\\_120120v2.pdf?1606868527](https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527).

through June 2020. Efforts were made to reflect the geographic distribution, size, and other characteristics of ADUs across counties and subregions.

SCAG concluded that 22.7% of ADUs were affordable to very-low-income households. Based on these assumptions, of the total 84 ADUs that are projected to be built during the planning period, 19 are estimated to be affordable to very-low-income households, 29 to low-income households, 29 to moderate-income households, and 7 to above moderate-income households. **Table 9** shows the assumptions for ADU affordability based on the SCAG survey for San Bernardino/Riverside Counties.

<b>Table 9. Estimated Affordability of Projected ADUs 2021–2029</b>		
Income Level	Percent of ADUs	Projected Number of ADUs
Very Low Income	22.7%	8
Low Income	34.8%	11
Moderate Income	34.8%	11
Above Moderate Income	7.7%	3
<b>Total</b>	<b>100%</b>	<b>33</b>
Source: SCAG (Southern California Association of Governments). 2020. "SCAG Regional Accessory Dwelling Unit Affordability Analysis." <a href="https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527">https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527</a> .		

ADU = accessory dwelling unit

In coordination with the updated policies and programs in the Housing Element and the City’s ongoing efforts to promote the development of ADUs and JADUs, it is likely that these units will be produced at a higher rate.

## 5 Summary of Capacity to Accommodate the RHNA

The City of Highland is a growing community San Bernardino County. Although the western portion of the City (west of I-210) is largely built-out, large amounts of vacant land remain in the eastern portions of the City with the possibility of providing new housing opportunities. There are also opportunities for ADUs and for the redevelopment of underutilized sites that meet density requirements, have an aging structure, and have a low floor to area ratio (i.e. low ratio of a building's total floor area to the size of the piece of land upon which it is built). The identification of these sites paired with the programs of the Housing Element will ensure that the City can realistically meet the RHNA targets at all income levels for the 6th Cycle.

**Table 10** provides a summary of total residential capacity included in the final sites inventory compared to the City’s 6th Cycle RHNA. As shown in **Table 10**, the City has a total capacity for 1,347 lower-income units, 518 moderate-income units, and 1,427 above moderate-income units within the residential pipeline of projects, vacant and underutilized sites, and through the expected number of ADUs and JADUs, which is sufficient capacity to accommodate the RHNA of 2,513 units.

A site-by-site overview for all sites identified in this sites inventory is included in **Table 11**. The overview includes each parcel’s Assessor’s Parcel No., acres, potential number of units under the realistic capacity assumptions, income level, and, if applicable, existing use, age of building, and floor area ratio.

**Table 10. Summary of Residential Capacity Compared to 6th Cycle RHNA by Income,  
City of Indio, June 30, 2021 through October 31, 2029**

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
RHNA	2,513	1,028	471	1,014
Pipeline Residential Development Credited Toward RHNA	1,313	200	250	863
Vacant and Underutilized Site Capacity	1,946	1,128	257	561
Potential Accessory Dwelling Units	33	19	11	3
<b>Total Capacity</b>	<b>3,292</b>	<b>1,347</b>	<b>518</b>	<b>1,427</b>
<b>Total Net-New-Units</b>	<b>3,257</b>	<b>1,323</b>	<b>513</b>	<b>1,421</b>
<b>Total Capacity Surplus (+)/ Deficit (-)</b>	<b>—</b>	<b>+295</b>	<b>+42</b>	<b>+407</b>

RHNA = Regional Housing Needs Assessment

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
<b>Lower-Income Sites</b>									
Yes	1	0278-121-41	0.67	R-4	13	0	0	13	Underutilized, older residential unit, built 1948, FAR 0.05, IL Ratio 0.05
Yes	2	0278-121-42	3.06	R-4	61	0	0	61	Vacant
Yes	3	0278-131-34	0.82	R-4	16	0	0	16	Underutilized, 2 older residential units, built 1936
No	4A	0278-131-40	0.18	R-4	4	0	0	4	Vacant
Yes	4A	0278-131-48	3.8	R-4	76	0	0	76	Underutilized, 2 nonresidential buildings built 1980, FAR 0.04, large dirt lot
Yes	5	0278-131-41	1.1	R-4	22	0	0	22	Underutilized, units built 1956, FAR 0.12
Yes	6	0278-131-45	4.24	R-4	85	0	0	85	Vacant
Yes	7	0278-131-46	0.71	R-4	14	0	0	14	Vacant
Yes	8	0278-131-47	1.76	R-4	35	0	0	35	Vacant
Yes	9	0278-201-26	0.93	R-4	19	0	0	19	Underutilized, vacant commercial building
Yes	10	0278-201-27	0.53	R-4	11	0	0	11	Vacant
Yes	11	0278-201-28	0.97	R-4	19	0	0	19	Vacant
No	12B	1191-181-02	0.17	R-4	3	0	0	3	Vacant
No	12B	1191-181-03	0.17	R-4	3	0	0	3	Vacant
No	12B	1191-181-04	0.17	R-4	3	0	0	3	Vacant
No	12B	1191-181-05	0.16	R-4	3	0	0	3	Vacant
No	12B	1191-181-06	0.16	R-4	3	0	0	3	Vacant
Yes	12B	1191-181-07	4.56	R-4	91	0	0	91	Vacant
Yes	13	1191-181-08	0.81	R-4	16	0	0	16	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	14	1191-241-09	1.46	R-4	29	0	0	29	Underutilized, 1 older residential unit, built 1979
Yes	15	1191-241-10	4.91	R-4	98	0	0	98	Underutilized, 1 older residential unit, built 1955, FAR 0.01
Yes	16	1191-241-12	4.92	R-4	98	0	0	98	Underutilized, 1 older residential unit, built 1963, FAR 0.01
Yes	17	1191-241-13	0.67	R-4	13	0	0	13	Vacant
Yes	18	1191-241-14	0.71	R-4	14	0	0	14	Vacant
Yes	19	1191-241-15	0.71	R-4	14	0	0	14	Underutilized, 1 older residential unit, built 1951, FAR 0.05
Yes	20C	1191-241-17	0.66	R-4	13	0	0	13	Underutilized, 1 older residential unit, built 1965, FAR 0.06
Yes	20C	1191-241-18	0.41	R-4	8	0	0	8	Vacant
Yes	21	1191-241-19	0.76	R-4	15	0	0	15	Underutilized, 2 older residential units, built 1925, FAR 0.05
Yes	22	1192-381-38	1.82	R-4	36	0	0	36	Vacant
Yes	23	1192-431-04	1.74	R-4	35	0	0	35	Underutilized, 1 older residential unit, built 1945, FAR 0.01
Yes	24	1192-431-05	1.98	R-4	40	0	0	40	Vacant
Yes	25	1192-431-06	2.14	R-4	43	0	0	43	Underutilized, 1 older residential unit, built 1920, FAR 0.02
Yes	26	1192-431-07	2.7	R-4	54	0	0	54	Underutilized, 2 older residential units, built 1920, FAR 0.01
Yes	27	1192-581-03	1.88	R-4	38	0	0	38	Underutilized, 1 older residential unit, built 1948, FAR 0.02
Yes	28	1192-601-02	1.77	R-4	35	0	0	35	Vacant
No	29	1192-601-38	0.99	R-4	20	0	0	20	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	30	1192-601-39	0.52	R-4	10	0	0	10	Vacant
No	31	1192-601-40	0.92	R-4	18	0	0	18	Vacant
<b>Moderate-Income Sites</b>									
Yes	32	0278-121-08	0.4	R-2	0	3	0	3	Vacant
Yes	33	0278-121-12	0.13	R-2	0	1	0	1	Vacant
Yes	34	0278-121-14	0.21	R-2C	0	1	0	1	Vacant
Yes	35	0278-121-16	0.33	R-2C	0	2	0	2	Vacant
Yes	36	0278-131-22	0.21	R-2	0	2	0	2	Vacant
Yes	37	0278-262-26	1	R-2	0	8	0	8	Vacant
No	38	0278-252-33	1.50	R-2	0	12	0	12	Underutilized, older residential unit, built 1900, FAR 0.07
No	39	0278-252-34	1.46	R-2	0	12	0	12	Underutilized, 2 older residential units, built 1946, FAR 0.02
No	40	0278-252-35	0.49	R-2	0	4	0	4	Underutilized, commercial building built 1948, FAR 0.03
No	41	0278-262-20	0.98	R-2	0	8	0	8	Underutilized, older residential unit, built 1946, FAR 0.02
No	42	0278-262-38	1.52	R-2	0	12	0	12	Underutilized, older residential unit, built 1944
Yes	43	1191-141-28	0.21	PD	0	3	0	3	Vacant
Yes	44	1191-141-31	0.21	PD	0	3	0	3	Vacant
Yes	45	1191-181-49	0.56	PD	0	7	0	7	Vacant
Yes	46	1191-191-11	1.9	R-2C	0	11	0	11	Vacant
Yes	47	1191-201-12	4.94	R-2C	0	30	0	30	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	48	1191-231-02	0.55	R-2	0	4	0	4	Vacant
Yes	49	1191-231-14	0.23	R-2	0	2	0	2	Vacant
Yes	50	1191-341-32	0.17	R-3	0	2	0	2	Vacant
No	51	1191-341-33	0.14	R-3	0	2	0	2	Vacant
No	52	1191-381-01	4.56	MU	0	55	0	55	Vacant
No	53	1191-381-02	1.06	MU	0	13	0	13	Vacant
No	54	1191-501-77	0.47	MU	0	6	0	6	Vacant
Yes	55	1192-011-09	0.19	R-2C	0	1	0	1	Vacant
Yes	56	1192-011-10	0.18	R-2C	0	1	0	1	Vacant
Yes	57	1192-011-11	0.18	R-2C	0	1	0	1	Vacant
Yes	58	1192-011-12	0.18	R-2C	0	1	0	1	Vacant
Yes	59	1192-011-33	0.09	R-2C	0	1	0	1	Vacant
Yes	60	1192-011-34	0.18	R-2C	0	1	0	1	Vacant
No	61	1192-071-08	0.22	R-2	0	2	0	2	Vacant
Yes	62	1192-201-23	0.35	R-2	0	3	0	3	Vacant
Yes	63	1192-411-06	0.42	R-2C	0	3	0	3	Vacant
Yes	64	1200-431-02	2	PD	0	24	0	24	Vacant
Yes	65	1200-431-04	1	PD	0	12	0	12	Vacant
No	66	1201-011-08	0.32	MU	0	4	0	4	Vacant
<b>Above Moderate-Income Units</b>									
No	67	0273-152-07	0.24	R-1	0	0	1	1	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	68	0273-253-17	0.33	R-1	0	0	1	1	Vacant
Yes	69	0273-261-26	0.17	R-1	0	0	1	1	Vacant
Yes	70	0273-261-27	1.04	R-1	0	0	4	4	Vacant
Yes	71	0278-085-09	0.3	R-1	0	0	1	1	Vacant
Yes	72	0278-101-27	0.16	R-1	0	0	1	1	Vacant
Yes	73	0278-102-20	0.23	R-1	0	0	1	1	Vacant
Yes	74	0278-111-16	0.11	R-1	0	0	0	0	Vacant
Yes	75	0278-111-21	0.23	R-1	0	0	1	1	Vacant
Yes	76	0278-113-02	0.45	R-1	0	0	2	2	Vacant
Yes	77	0278-113-05	0.45	R-1	0	0	2	2	Vacant
Yes	78	0278-113-14	0.23	R-1	0	0	1	1	Vacant
Yes	79	0278-201-01	5.86	R-1	0	0	23	23	Vacant
Yes	80	0278-201-09	0.24	R-1	0	0	1	1	Vacant
Yes	81	0278-201-11	2.21	R-1	0	0	9	9	Vacant
Yes	82	0278-201-12	2.27	R-1	0	0	9	9	Vacant
Yes	83	0278-221-01	1.14	R-1	0	0	5	5	Vacant
Yes	84	0278-221-05	0.23	R-1	0	0	1	1	Vacant
Yes	85	0278-221-08	1.33	R-1	0	0	5	5	Vacant
Yes	86	0278-221-22	0.69	R-1	0	0	3	3	Vacant
Yes	87	0278-242-23	0.24	R-1	0	0	1	1	Vacant
Yes	88	0278-243-04	0.23	R-1	0	0	1	1	Vacant
Yes	89	0278-244-07	0.25	R-1	0	0	1	1	Vacant



**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	90	0278-252-29	0.32	R-1	0	0	1	1	Vacant
Yes	91	0278-261-07	0.22	R-1	0	0	1	1	Vacant
Yes	92	0278-261-15	0.11	R-1	0	0	0	0	Vacant
Yes	93	0278-262-31	0.01	R-1	0	0	1	1	Vacant
Yes	94	1191-341-16	1.51	R-1	0	0	6	6	Vacant
Yes	95	1191-341-18	0.36	VR	0	0	1	1	Vacant
No	96	1191-341-48	0.19	VR	0	0	1	1	Vacant
Yes	97	1191-341-69	0.17	VR	0	0	1	1	Vacant
Yes	98	1191-361-07	0.4	R-1	0	0	2	2	Vacant
Yes	99	1191-371-29	0.16	R-1	0	0	1	1	Vacant
Yes	100	1191-371-42	0.16	R-1	0	0	1	1	Vacant
Yes	101	1191-381-03	0.18	R-1	0	0	1	1	Vacant
Yes	102	1191-381-35	0.15	R-1	0	0	1	1	Vacant
Yes	103	1191-381-36	0.15	R-1	0	0	1	1	Vacant
Yes	104	1191-381-43	0.15	R-1	0	0	1	1	Vacant
Yes	105	1191-381-55	0.15	R-1	0	0	1	1	Vacant
Yes	106	1191-411-08	0.18	R-1	0	0	1	1	Vacant
Yes	107	1191-421-03	0.17	R-1	0	0	1	1	Vacant
Yes	108	1191-421-19	0.17	R-1	0	0	1	1	Vacant
Yes	109	1191-421-24	0.15	R-1	0	0	1	1	Vacant
Yes	110	1191-471-03	0.19	VR	0	0	1	1	Vacant
Yes	111	1191-471-34	0.09	VR	0	0	1	1	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	112	1191-471-55	0.14	VR	0	0	1	1	Vacant
Yes	113	1191-472-07	0.12	VR	0	0	1	1	Vacant
Yes	114	1192-011-28	0.07	R-1	0	0	1	1	Vacant
Yes	115	1192-011-41	0.15	R-1	0	0	1	1	Vacant
Yes	116	1192-021-04	0.1	R-1	0	0	0	0	Vacant
Yes	117	1192-021-09	0.32	R-1	0	0	1	1	Vacant
Yes	118	1192-041-33	0.69	R-1	0	0	3	3	Vacant
Yes	119	1192-061-44	0.18	R-1	0	0	1	1	Vacant
Yes	120	1192-081-10	0.25	R-1	0	0	1	1	Vacant
No	121	1192-081-11	0.28	R-1	0	0	1	1	Vacant
No	122	1192-081-29	0.94	R-1	0	0	4	4	Vacant
Yes	123	1192-081-30	0.71	R-1	0	0	3	3	Vacant
No	124	1192-081-31	0.25	R-1	0	0	1	1	Vacant
Yes	125	1192-131-13	0.12	R-1	0	0	0	0	Vacant
Yes	126	1192-141-51	0.21	R-1	0	0	1	1	Vacant
Yes	127	1192-141-62	0.16	R-1	0	0	1	1	Vacant
Yes	128	1192-151-14	2.16	R-1	0	0	9	9	Vacant
Yes	129	1192-151-24	0.25	R-1	0	0	1	1	Vacant
Yes	130	1192-161-06	0.57	R-1	0	0	2	2	Vacant
Yes	131	1192-161-09	1.27	R-1	0	0	5	5	Vacant
Yes	132	1192-181-04	0.22	R-1	0	0	1	1	Vacant
Yes	133	1192-181-05	0.22	R-1	0	0	1	1	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	134	1192-201-12	0.44	R-1	0	0	2	2	Vacant
Yes	135	1192-251-13	1.42	R-1	0	0	6	6	Vacant
Yes	136	1192-251-18	0.17	R-1	0	0	1	1	Vacant
Yes	137	1192-261-07	1.38	R-1	0	0	6	6	Vacant
Yes	138	1192-261-08	0.16	R-1	0	0	1	1	Vacant
Yes	139	1192-331-28	0.21	R-1	0	0	1	1	Vacant
Yes	140	1192-331-29	0.23	R-1	0	0	1	1	Vacant
Yes	141	1192-341-17	0.16	R-1	0	0	1	1	Vacant
Yes	142	1192-341-18	0.16	R-1	0	0	1	1	Vacant
Yes	143	1192-341-20	0.16	R-1	0	0	1	1	Vacant
Yes	144	1192-341-23	0.16	R-1	0	0	1	1	Vacant
Yes	145	1192-341-29	0.32	R-1	0	0	1	1	Vacant
Yes	146	1192-341-49	0.16	R-1	0	0	1	1	Vacant
Yes	147	1192-351-07	0.22	R-1	0	0	1	1	Vacant
Yes	148	1192-351-10	0.23	R-1	0	0	1	1	Vacant
Yes	149	1192-351-21	0.23	R-1	0	0	1	1	Vacant
No	150	1192-341-11	4.3	R-1	0	0	20	20	Underutilized, 1 home built 1952, FAR 0.0097
No	151	1192-361-45	1.8	R-1	0	0	9	9	Vacant
No	152	1192-361-47	2.18	R-1	0	0	11	11	Vacant
Yes	153	1192-371-12	0.09	R-1	0	0	1	1	Vacant
Yes	154	1192-371-21	0.14	R-1	0	0	1	1	Vacant
Yes	155	1192-371-26	0.09	R-1	0	0	1	1	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	156	1192-391-76	0.17	R-1	0	0	1	1	Vacant
Yes	157	1192-421-25	0.21	R-1	0	0	1	1	Vacant
Yes	158	1192-471-21	1.95	R-1	0	0	8	8	Vacant
No	159	1192-501-04	0.17	R-1	0	0	1	1	Vacant
No	160	1192-531-48	0.2	R-1	0	0	1	1	Vacant
No	161	1192-531-50	0.2	R-1	0	0	1	1	Vacant
No	162	1192-531-53	0.18	R-1	0	0	1	1	Vacant
No	163	1192-531-56	0.18	R-1	0	0	1	1	Vacant
No	164	1192-531-59	0.18	R-1	0	0	1	1	Vacant
No	165	1192-531-61	0.19	R-1	0	0	1	1	Vacant
No	166	1192-531-63	0.19	R-1	0	0	1	1	Vacant
No	167	1192-531-64	0.19	R-1	0	0	1	1	Vacant
No	168	1192-531-65	0.19	R-1	0	0	1	1	Vacant
No	169	1192-531-68	0.19	R-1	0	0	1	1	Vacant
No	170	1192-542-09	0.24	R-1	0	0	1	1	Vacant
No	171	1192-542-10	0.24	R-1	0	0	1	1	Vacant
No	172	1192-542-11	0.24	R-1	0	0	1	1	Vacant
No	173	1192-542-12	0.24	R-1	0	0	1	1	Vacant
No	174	1192-542-13	0.24	R-1	0	0	1	1	Vacant
No	175	1192-542-14	0.24	R-1	0	0	1	1	Vacant
No	176	1192-542-17	0.25	R-1	0	0	1	1	Vacant
No	177	1192-542-18	0.2	R-1	0	0	1	1	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
No	178	1192-542-19	0.19	R-1	0	0	1	1	Vacant
No	179	1192-542-20	0.19	R-1	0	0	1	1	Vacant
No	180	1192-542-21	0.19	R-1	0	0	1	1	Vacant
No	181	1192-542-22	0.19	R-1	0	0	1	1	Vacant
No	182	1192-542-23	0.19	R-1	0	0	1	1	Vacant
No	183	1192-542-24	0.19	R-1	0	0	1	1	Vacant
No	184	1192-542-25	0.19	R-1	0	0	1	1	Vacant
No	185	1192-542-30	0.19	R-1	0	0	1	1	Vacant
No	186	1192-542-31	0.19	R-1	0	0	1	1	Vacant
No	187	1192-542-32	0.19	R-1	0	0	1	1	Vacant
No	188	1192-542-33	0.19	R-1	0	0	1	1	Vacant
No	189	1192-542-34	0.19	R-1	0	0	1	1	Vacant
No	190	1192-542-35	0.19	R-1	0	0	1	1	Vacant
No	191	1192-542-36	0.19	R-1	0	0	1	1	Vacant
No	192	1192-542-37	0.19	R-1	0	0	1	1	Vacant
Yes	193	1200-071-02	0.3	R-1	0	0	1	1	Vacant
Yes	194	1200-071-20	0.16	R-1	0	0	1	1	Vacant
No	195	1200-091-16	4.97	R-1	0	0	20	20	Vacant
No	196	1200-102-34	1.18	R-1	0	0	5	5	Vacant
Yes	197	1200-291-39	4.58	A/EQ	0	0	9	9	Vacant
Yes	198	1200-311-02	2.75	A/EQ	0	0	6	6	Vacant
No	199	1200-341-09	0.59	R-1	0	0	2	2	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	200	1200-371-08	0.15	R-1	0	0	1	1	Vacant
Yes	201	1200-381-30	0.15	R-1	0	0	1	1	Vacant
Yes	202	1200-451-04	0.15	R-1	0	0	1	1	Vacant
Yes	203	1200-551-41	1.66	A/EQ	0	0	3	3	Vacant
No	204	1200-591-01	1.87	A/EQ	0	0	4	4	Vacant
No	205	1201-021-09	1.97	R-1	0	0	8	8	Vacant
Yes	206	1201-041-23	0.33	R-1	0	0	1	1	Vacant
Yes	207	1201-041-57	0.27	R-1	0	0	1	1	Vacant
Yes	208	1201-041-58	0.26	R-1	0	0	1	1	Vacant
Yes	209	1201-041-59	0.26	R-1	0	0	1	1	Vacant
Yes	210	1201-061-02	4.75	R-1	0	0	19	19	Vacant
No	211	1210-201-02	0.21	R-1	0	0	1	1	Vacant
No	212	1210-201-03	0.27	R-1	0	0	1	1	Vacant
No	213	1210-201-12	0.2	R-1	0	0	1	1	Vacant
No	214	1210-201-13	0.15	R-1	0	0	1	1	Vacant
No	215	1210-202-14	0.21	R-1	0	0	1	1	Vacant
No	216	1210-202-46	0.17	R-1	0	0	1	1	Vacant
No	217	1210-202-47	0.17	R-1	0	0	1	1	Vacant
No	218	1210-202-52	0.15	EHV	0	0	1	1	Vacant
No	219	1210-202-53	0.18	EHV	0	0	1	1	Vacant
Yes	220	1210-271-01	3.35	R-1	0	0	13	13	Underutilized, older nonresidential structure
No	221	1210-271-02	0.88	R-1	0	0	4	4	Vacant

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
Yes	222	1210-271-03	1.96	R-1	0	0	8	8	Underutilized, older shed
No	223	1210-271-07	4.65	R-2	0	0	23	23	Underutilized, 1 home built 1940, FAR 0.0088
No	224	1210-271-08	1.21	R-1	0	0	5	5	Vacant
No	225	1210-271-09	1.62	R-1	0	0	6	6	Vacant
No	226	1210-271-11	1.78	R-1	0	0	7	7	Vacant
No	227	1210-371-13	6.97	R-1	0	0	28	28	Vacant
No	228	1210-371-14	3.04	R-1	0	0	12	12	Vacant
Yes	229	1210-371-15	10.29	R-1	0	0	41	41	Underutilized vacant commercial structure, built 1964, FAR 0.0066
No	230	1210-371-16	10.2	R-1	0	0	41	41	Vacant
Yes	231	1200-401-80	1.04	R-1	0	0	4	4	Vacant, Pending Project (La Praix)
No	232	1191-351-04	3.37	PD	0	0	15	15	Vacant, Pending Project
<b>Planned, Approved, and Prospective Projects</b>									
No	233	1210-371-51	21.6	R-1	0	0	54	54	Underutilized, Pending Project (Kiel 54)
No	234	0288-562-03	7.9	PD	0	0	46	46	Vacant, Pending Project (Highland Park)
No	235D	0297-021-18	179 total	PD	0	50	117	167	Vacant, Pending Project (Mediterra)
No	235D	0297-051-12	See above	PD	0	0	0	0	Vacant, Pending Project (Mediterra)
No	235D	0297-051-16	See above	PD	0	0	0	0	Vacant, Pending Project (Mediterra)
No	235D	0297-021-25	See above	PD	0	0	149	149	Vacant, Pending Project (Vista Verde at Mediterra)
No	235D	0297-021-26	See above	PD	0	0	0	0	Vacant, Pending Project (Vista Verde at Mediterra)

**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
No	235D	0297-021-27	See above	PD	0	0	0	0	Vacant, Pending Project (Vista Verde at Mediterra)
No	235D	0297-021-28	See above	PD	0	0	0	0	Vacant, Pending Project (Vista Verde at Mediterra)
Yes	236E	1201-401-02	22.97	PD	0	0	137	137	Vacant, Pending Project (Blossom Trails)
Yes	236E	1201-431-61	2.41	PD	0	0	0	0	Vacant, Pending Project (Blossom Trails)
No	237F	1201-351-14	2.35	PD	100	0	0	100	Vacant, Greenspot SP (PA 3)
No	237F	1201-351-15	1.5	PD	see above	0	0	see above	Vacant, Greenspot SP (PA 3)
No	237F	1201-351-16	1.92	PD	see above	0	0	see above	Vacant, Greenspot SP (PA 3)
No	237F	1201-351-28	6.9	PD	see above	0	0	see above	Vacant, Greenspot SP (PA 3)
No	238G	1201-331-01		PD	0	0	200	200	Vacant, Greenspot SP Pending Project (TREH partners project)
No	238G	1201-341-01		PD	0	0	0	0	Vacant, Greenspot SP Pending Project (TREH partners project)
No	238G	1201-341-08		PD	0	0	0	0	Vacant, Greenspot SP Pending Project (TREH partners project)
No	238G	1201-341-09		PD	0	0	0	0	Vacant, Greenspot SP Pending Project (TREH partners project)
No	239H	120134102	1.19	PD	100	200	0	300	Underutilized, Greenspot SP (PA 2); 1 residential unit built 1942, FAR 0.022
No	239H	120134103	1.49		see above	see above	0	see above	Underutilized, Greenspot SP (PA 2); 1 residential unit built 1940, FAR 0.032
No	239H	120134104	1		see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	239H	120134129	4.4		see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	239H	120134130	0.1		see above	see above	0	see above	Vacant, Greenspot SP (PA 2)



**Table 11. Sites Inventory Table**

Included in Previous Cycle(s)	Site ID*	APN19	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Mod-Income Units	Total Units	Site Description
No	239H	120134133	20.65		see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	239H	120134159	0.02		see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	239H	120134160	0.001		see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
Yes	239H	120135119	0.08	PD	see above	see above	0	see above	Underutilized, Greenspot SP (PA 2); 1 residential unit built 1942, FAR 0.07
No	239H	120135120	0.68	PD	see above	see above	0	see above	Underutilized, Greenspot SP (PA 2); 1 residential unit built 1955, FAR 0.18
Yes	239H	120135121	0.41	PD	see above	see above	0	see above	Underutilized, Greenspot SP (PA 2); 1 residential unit built 1953, FAR 0.07
Yes	239H	120135122	0.02	PD	see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	240I	1191-191-06	1.95	R-4	0	0	60	60	Vacant, Pending Project (Senior Assisted Living)
No	240I	1191-181-01	0.30	R-4	0	0	see above	see above	Vacant, Pending Project (Senior Assisted Living)
No	241J	1200-381-43	2.08	MU	0	0	17	17	Vacant, Pending Project (Tractor Supply Co)
No	241J	1200-381-05	6.96	MU	0	0	see above	see above	Vacant, Pending Project (Tractor Supply Co)
Yes	242	1200-041-02	4.19	PD	0	0	49	49	Vacant, Pending Project (Crestwood Communities)
Yes	243	1200-421-34	2.9	MU	0	0	34	34	Vacant, Pending Project (Paseo Del Oro)
<b>Total Units</b>					<b>1,328</b>	<b>507</b>	<b>1,424</b>	<b>3,259</b>	

\*Note: Generally, a site is a parcel or a group of parcels that can accommodate a portion of the jurisdictions RHNA. All multi-parcel sites are denoted by a number and letter in their Site ID. All parcels belonging to one site, will have the same Site ID listed in this table.

# Appendix F: Community Engagement Summary

## Table of Contents

- 1 Stakeholder Engagement ..... 1
  - 1.1 Online Survey ..... 1
  - 1.2 Community Outreach Workshop ..... 1
  - 1.3 Planning Commission and City Council Joint Session Public Meeting ..... 2
  - 1.4 Stakeholder Interviews ..... 2
- 2 Presentation Material ..... 3

# 1 Stakeholder Engagement

The City conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Stay-at-home orders of 2020 and 2021 resulting from the Coronavirus (COVID-19) pandemic provided the City with opportunities to explore new avenues for public engagement, increasing access for those that are traditionally not involved in the planning process and providing new opportunities for community members to take an active role in their City's Housing Element Update process virtually. Early outreach and formal engagement activities were held virtually, while the City took additional informal opportunities to engage the public. The following outreach activities were conducted to engage stakeholders and inform the development of the Housing Element.

## 1.1 Online Survey

The online survey engaged a total of 112 participants to better inform local housing needs and concerns. The survey was made available beginning in late 2020 through the summer of 2021 on the City's website, emailed to the City's interested parties list and to a comprehensive stakeholder's group, and advertised during virtual public meetings. Survey participants identified a need for single-family housing development, followed by condominiums with multifamily ownership, and accessory dwelling units. Similarly, for those who wish to own a home in Highland but do not, respondents acknowledged a lack of available homes within their price range and inability to pay an appropriate down payment as the leading reasons for not owning a home. The vast majority of survey respondents, 94 percent, responded that they currently live in a single-family home, as opposed to only three percent whom live in a multi-family home. Of the remaining survey participants, two percent responded that they currently live in a duplex or attached home, one percent in an accessory dwelling unit, and one percent in another type of housing. Participants also acknowledged a diversity of reasons for choosing to live in Highland, including affordability, proximity to family, friends, and work, safety of neighborhoods, and quality of schools. Identifying strategies for lower-income households to more easily access home ownership opportunities to a variety of housing types is the desired pathway to address obstacles and meet the City's housing priorities.

## 1.2 Community Outreach Workshop

A virtual community outreach workshop was held on November 12, 2020 which allowed interested parties to be engaged in a more formal setting where they learned about the planning process, the components of the Housing Element, the importance of their role in the development of the plan, and were given the opportunity to take part in an open Q&A session. Bilingual (English/Spanish) services were provided during the virtual public workshop to engage a broad spectrum of community members. The workshop was held on a Thursday evening, outside of regular working hours, to facilitate participation and optimize attendance. The workshop was streamed live via Zoom and onto Facebook and all comments and questions from the workshop and Facebook were read aloud and responded live as they were available. This workshop was also noticed in the City's newspaper, website, Facebook page, NextDoor, and flyers were mailed to a list of potentially interested parties and stakeholders. The following is a summary of this virtual workshop:

The virtual workshop held on November 12, 2020 provided participants an overview and history of the Housing Element components, update process, and explanation of the Regional Housing Needs Allocation.

Further, the workshop provided an overview of the Public Health, Safety, and Environmental Justice Element as it relates to disadvantaged communities and disproportionate impacts from pollution and fewer community resources. Participants were provided with polling questions relating to their local communities and how they might best be improved through updates to both the Housing Element and the Public Health, Safety, and Environmental Justice Element. A second section of the workshop included an explanation of how residents can best get involved in the planning process, summarized as attending virtual meetings and stakeholder interviews, responding to online surveys, utilizing the City's website, Facebook, and NextDoor as informational resources, and by contacting the City Project Manager with comments, questions, or concerns. The final section of the workshop was an open discussion with participants with the intention of hearing opinions about the most pervasive issues in the City as they relate to the. Participants identified overcrowding, affordability, lack of accessible amenities, homelessness, illegal dumping, and lack of green spaces in urban areas as their largest concerns in Highland.

### 1.3 Planning Commission and City Council Joint Session Public Meeting

A public joint session of the Planning Commission and the City Council occurred on June 8, 2021. Council and Commission members were provided an overview of Housing, Public Health and Safety, and Circulation Elements, as well as associated requirements, components, and needs assessment findings. This was a publicly noticed meeting under the Brown Act, where members of the public were invited to comment on the information being presented. The presentation highlighted the main issues relating to housing supply and affordability in California, including overcrowding, lack of affordability, and lack of supply, as well as explaining the Regional Housing Needs Allocation in the context of the City and its goals for the next 6<sup>th</sup> Cycle Housing Period between 2021 and 2029. During the discussion portion of the meeting, Council and Commission members expressed their concern for increasing density and the difficulty associated with maintaining the character of the community, environmental issues associated with greater waste production, circulation issues relating to increased traffic from housing production, and safety issues including the potential for increased crime. Council and Commission members also spoke in support of infill projects and incorporating density bonuses and creative design to revitalize communities with higher density projects.

### 1.4 Stakeholder Interviews

As a follow up to the November public workshop, all participants were contacted and invited to participate in individual stakeholder interviews. Of those contacted, four participated. Stakeholder interviews were conducted for the Housing, Safety, and Environmental Justice Element updates. Of the organizations and individuals that were contacted, four interviews took place. General feedback included information on what people like about living in Highland, such as proximity to parks and libraries; concerns about traffic caused by construction; concerns about crime; comments related to the number of people experiencing homelessness; and a calling to address the needs of older adults, especially as it relates to access to medical facilities and public transportation. There were discrepancies among respondents on the availability of accessible neighborhood amenities although there was also some mention acknowledging that the eastern side of Highland has more amenities for residents than the western side. While the feedback received was preliminary, all participants were invited to engage in future public workshops and to follow the ongoing update process.

## 2 Presentation Material

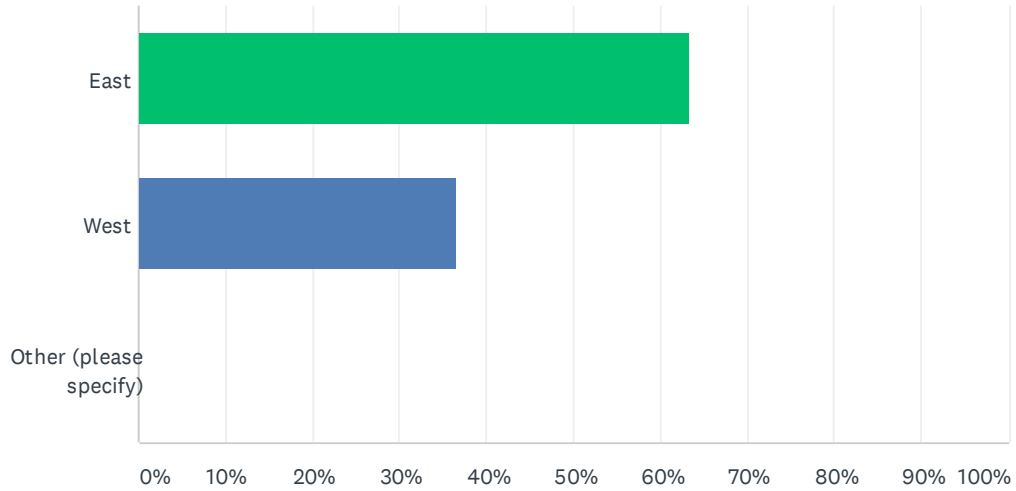
The following sections provide an overview and copy of the presentation materials used during the Planning Commission and City Council Joint Session Public Meeting, Community Outreach Workshop, and results from the online survey.

### 2.1 Online Survey Results

A summary and count of the responses and results from the online survey are provided below [**Exhibit A**].

### Q1 Do you live east or west of Interstate 210?

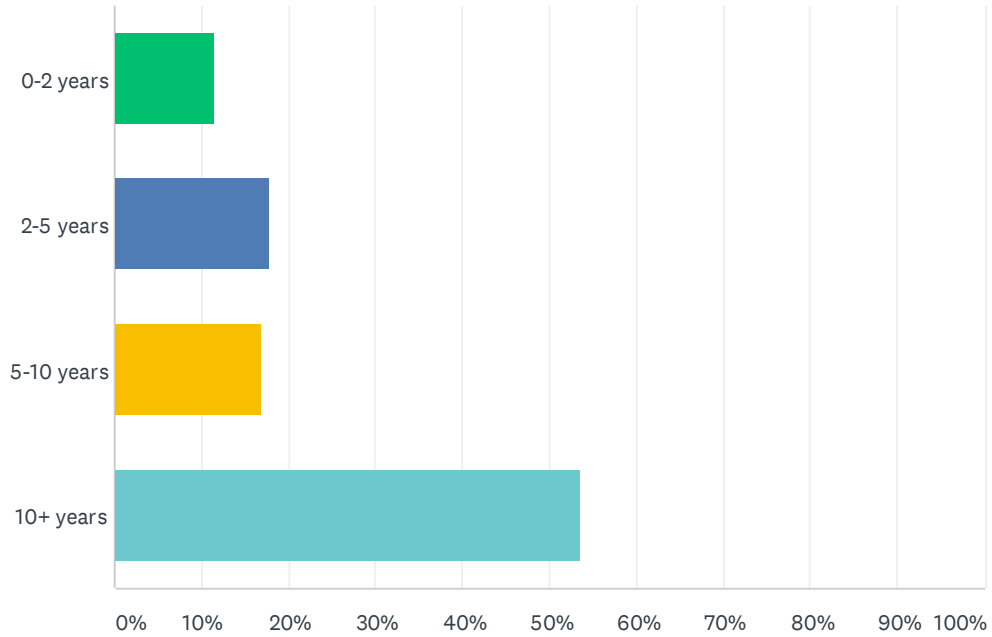
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
East	63.39%	71
West	36.61%	41
Other (please specify)	0.00%	0
<b>TOTAL</b>		<b>112</b>

## Q2 How long have you lived in Highland?

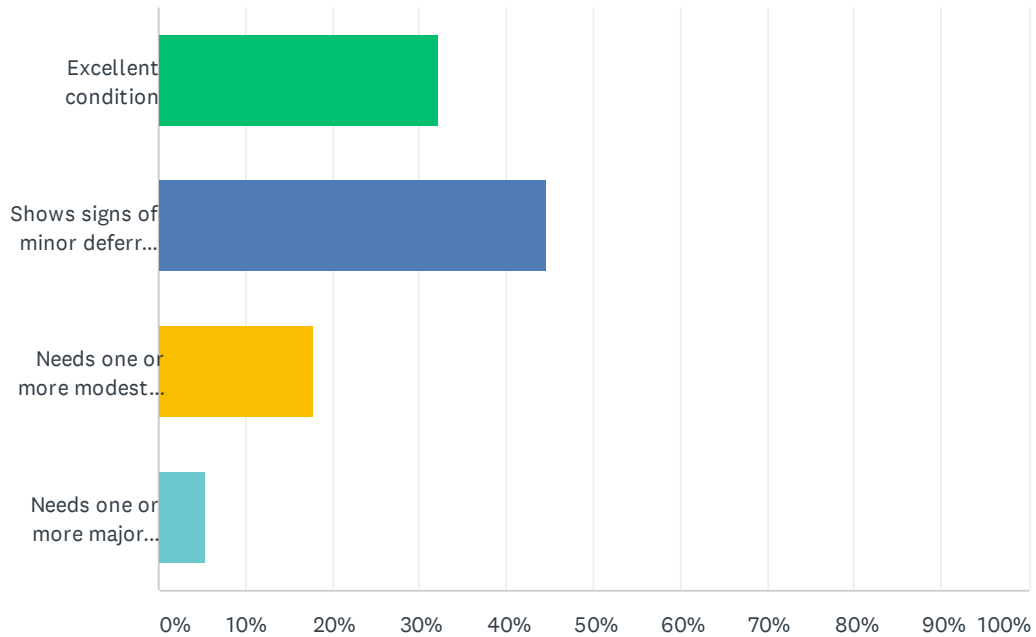
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
0-2 years	11.61%	13
2-5 years	17.86%	20
5-10 years	16.96%	19
10+ years	53.57%	60
<b>TOTAL</b>		<b>112</b>

### Q3 How would you rate the physical condition of the residence you live in?

Answered: 112 Skipped: 0

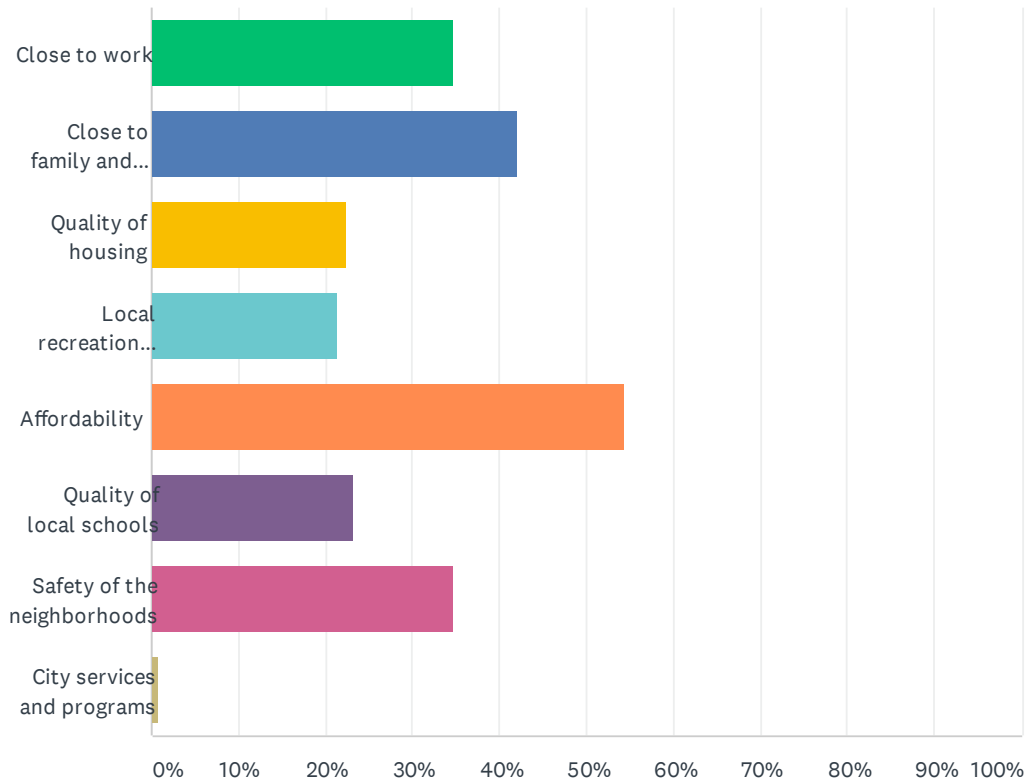


ANSWER CHOICES	RESPONSES	
Excellent condition	32.14%	36
Shows signs of minor deferred maintenance (i.e. peeling paint, chipped stucco, etc.)	44.64%	50
Needs one or more modest rehabilitation improvements (i.e. new roof, new siding, etc.)	17.86%	20
Needs one or more major upgrade (i.e. new foundation, new plumbing, new electrical, etc.)	5.36%	6
<b>TOTAL</b>		<b>112</b>



### Q4 Why have you chosen to live in Highland? Select all that apply.

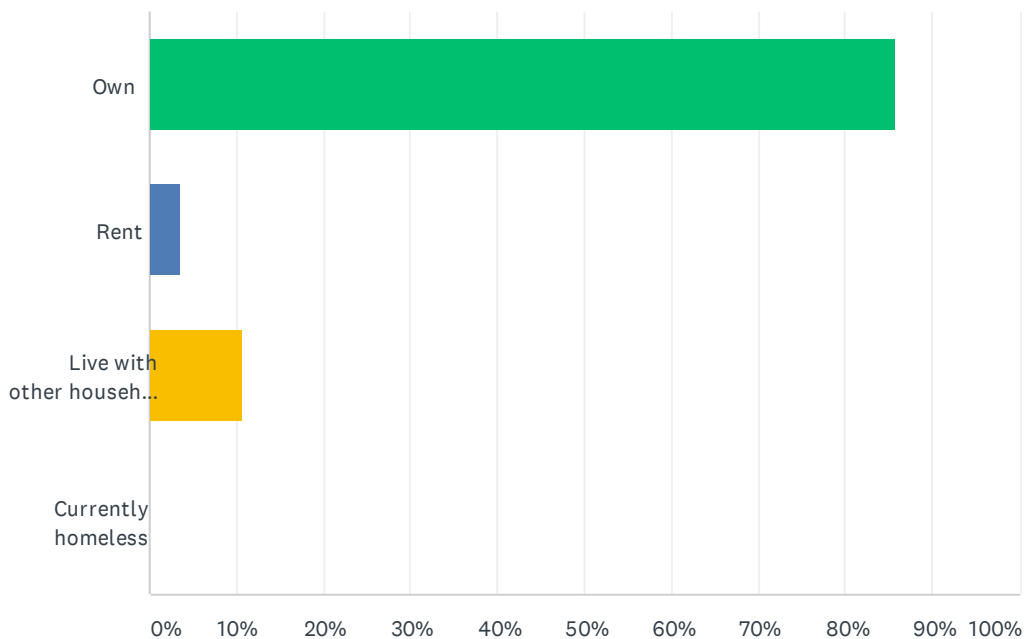
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES
Close to work	34.82% 39
Close to family and friends	41.96% 47
Quality of housing	22.32% 25
Local recreation amenities and scenery	21.43% 24
Affordability	54.46% 61
Quality of local schools	23.21% 26
Safety of the neighborhoods	34.82% 39
City services and programs	0.89% 1
Total Respondents: 112	

## Q5 Do you own or rent your home?

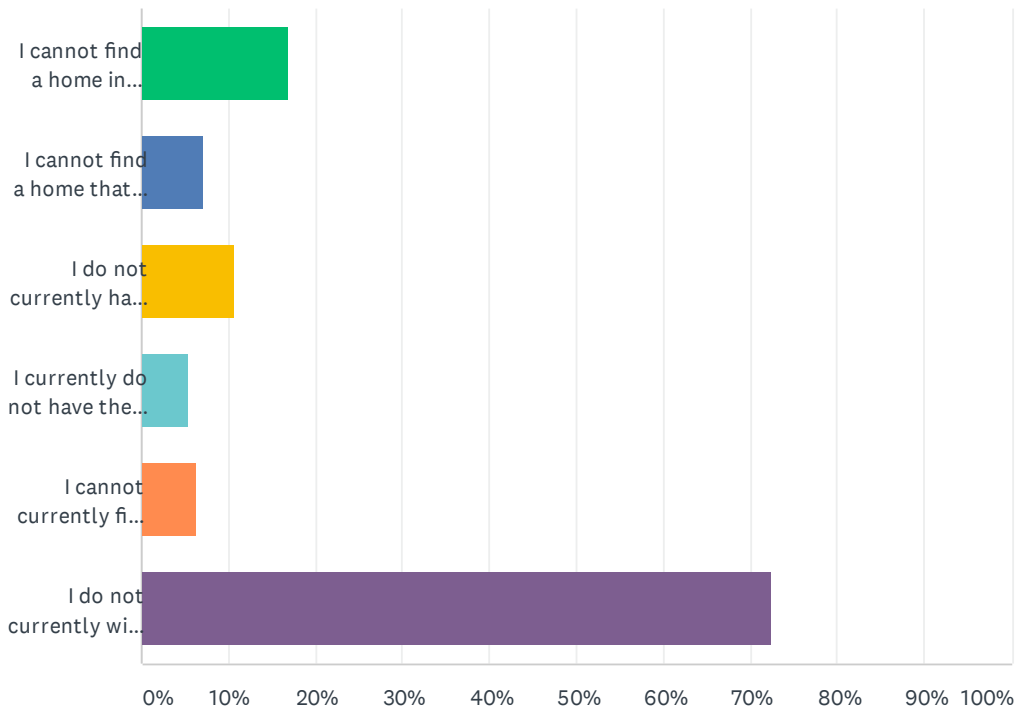
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Own	85.71%	96
Rent	3.57%	4
Live with other household (neither own or rent)	10.71%	12
Currently homeless	0.00%	0
<b>TOTAL</b>		<b>112</b>

### Q6 If you wish to own a home in Highland, but do not, what issues are preventing you at this time? Mark all that apply.

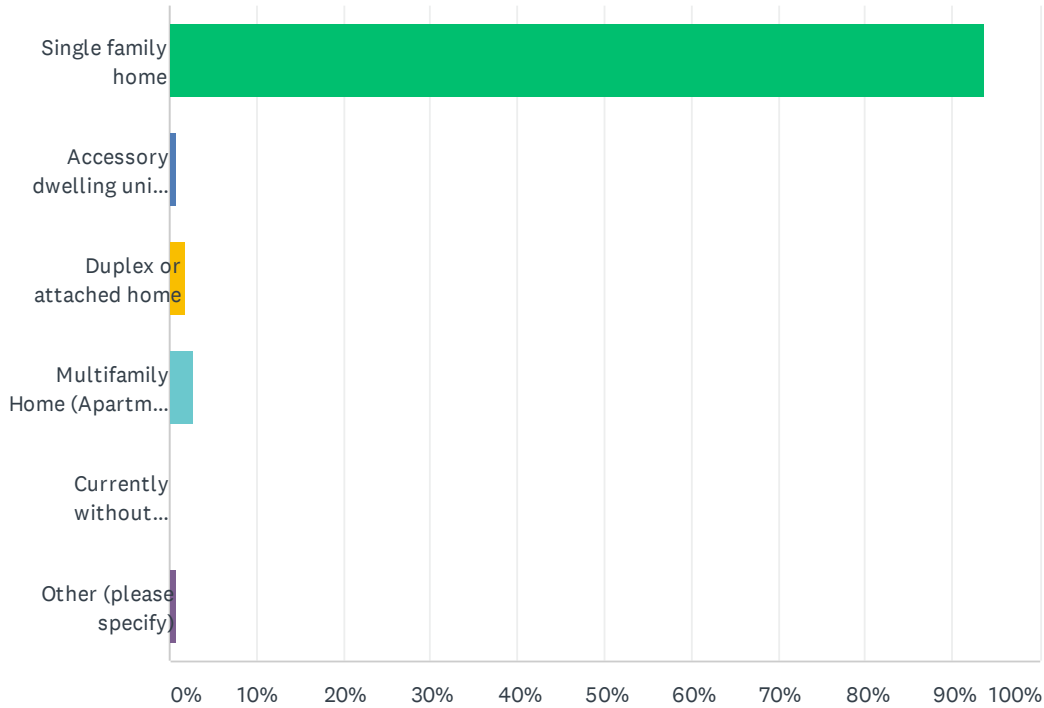
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
I cannot find a home in Highland within my target price range	16.96%	19
I cannot find a home that suits my needs (i.e. size, disability accommodations, etc.)	7.14%	8
I do not currently have the financial resources for an appropriate down payment	10.71%	12
I currently do not have the financial resources for an adequate monthly mortgage payment	5.36%	6
I cannot currently find a home that suits my quality standards in Highland	6.25%	7
I do not currently wish to own a home in Highland, or already own my home.	72.32%	81
Total Respondents: 112		

## Q7 Select the type of housing that best describes your current home

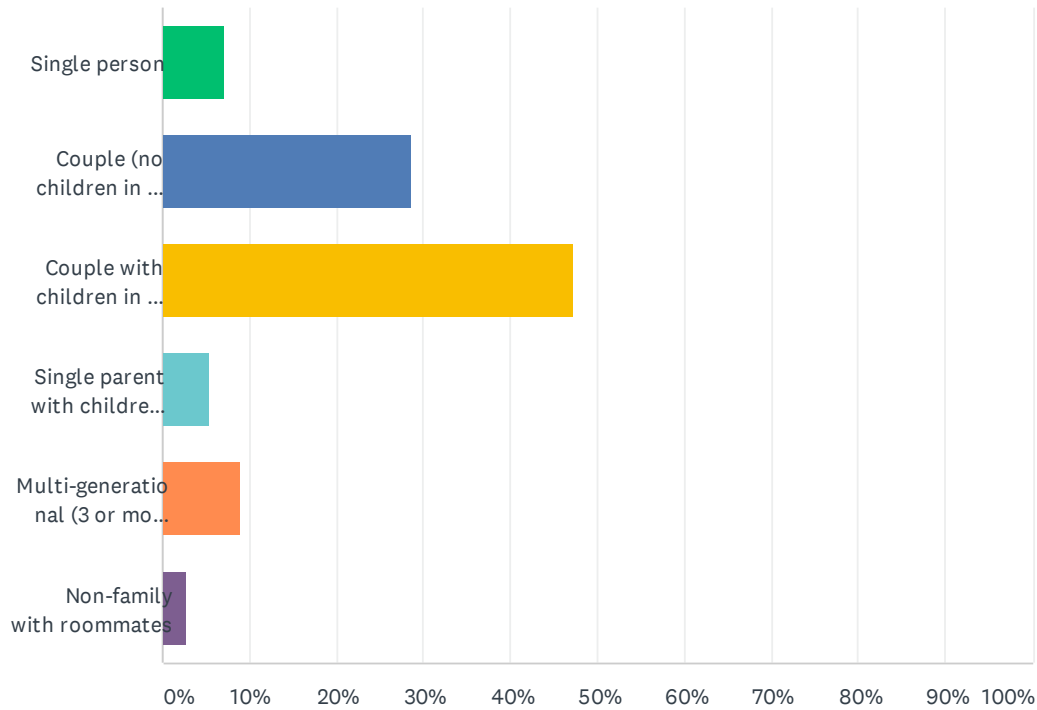
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single family home	93.75%	105
Accessory dwelling unit (granny flat or guest house)	0.89%	1
Duplex or attached home	1.79%	2
Multifamily Home (Apartment or Condo)	2.68%	3
Currently without permanent shelter	0.00%	0
Other (please specify)	0.89%	1
<b>TOTAL</b>		<b>112</b>

## Q8 Which best describes your household type?

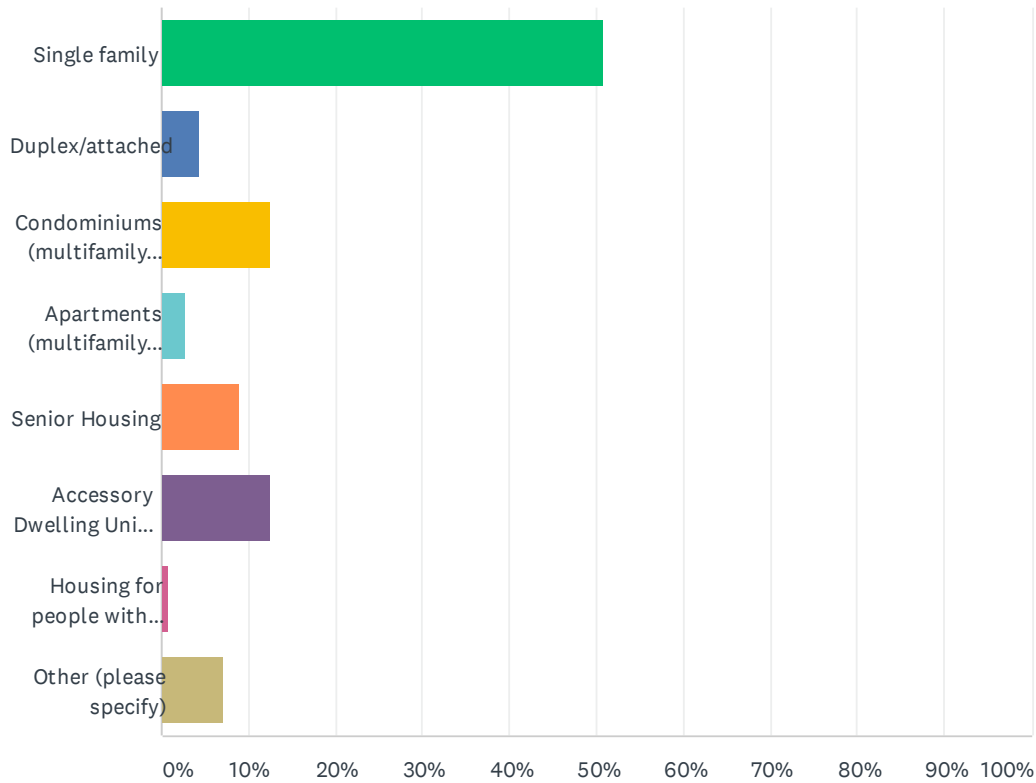
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single person	7.14%	8
Couple (no children in the home)	28.57%	32
Couple with children in the home	47.32%	53
Single parent with children in home	5.36%	6
Multi-generational (3 or more generations in the same home)	8.93%	10
Non-family with roommates	2.68%	3
<b>TOTAL</b>		<b>112</b>

## Q9 What type of housing is most needed in Highland?

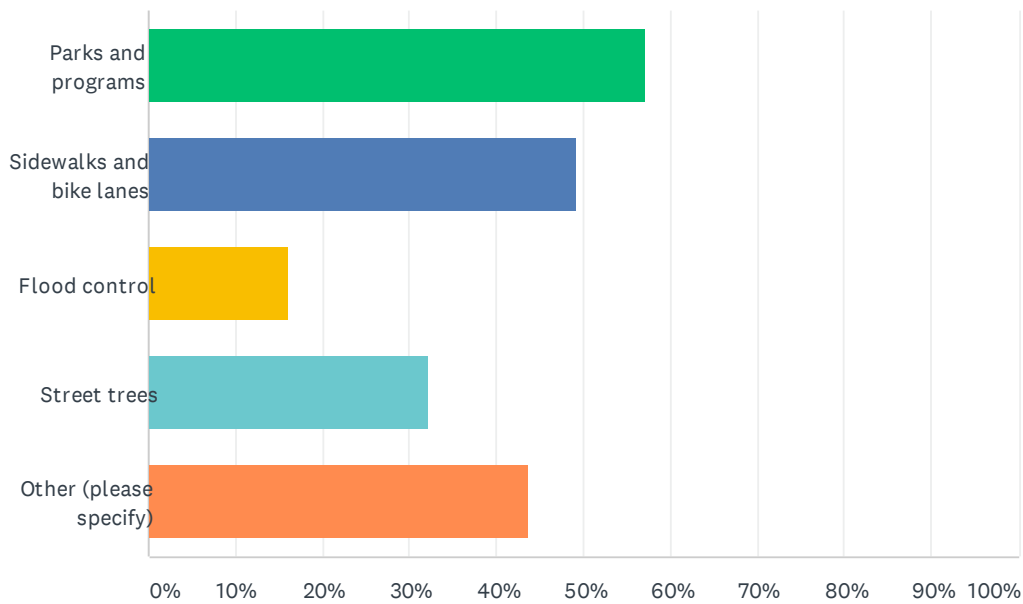
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single family	50.89%	57
Duplex/attached	4.46%	5
Condominiums (multifamily ownership)	12.50%	14
Apartments (multifamily rentals)	2.68%	3
Senior Housing	8.93%	10
Accessory Dwelling Units (granny flat or guest house)	12.50%	14
Housing for people with disabilities	0.89%	1
Other (please specify)	7.14%	8
<b>TOTAL</b>		<b>112</b>

### Q10 What public facilities, improvements or programs are needed in your neighborhood? (Select all that apply).

Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Parks and programs	57.14%	64
Sidewalks and bike lanes	49.11%	55
Flood control	16.07%	18
Street trees	32.14%	36
Other (please specify)	43.75%	49
Total Respondents: 112		

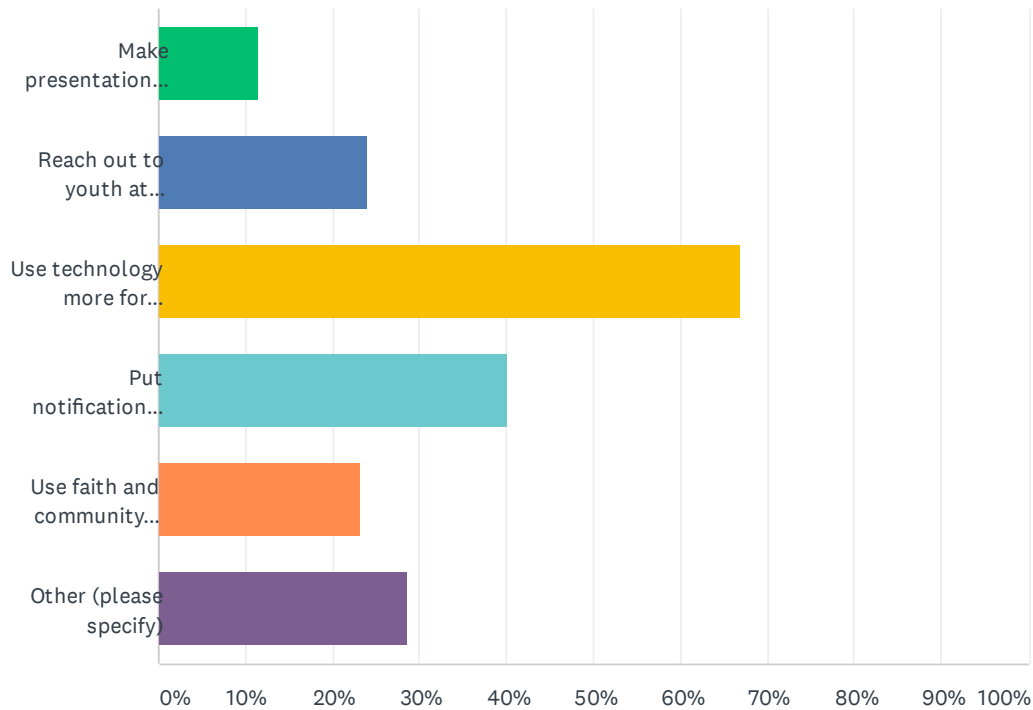
**Q11 What areas of the City have pollution, such as air pollution, and how could this be improved?**

Answered: 87 Skipped: 25



## Q12 What would help you get involved in Highland get engaged in the public decision making process? (Select all that apply).

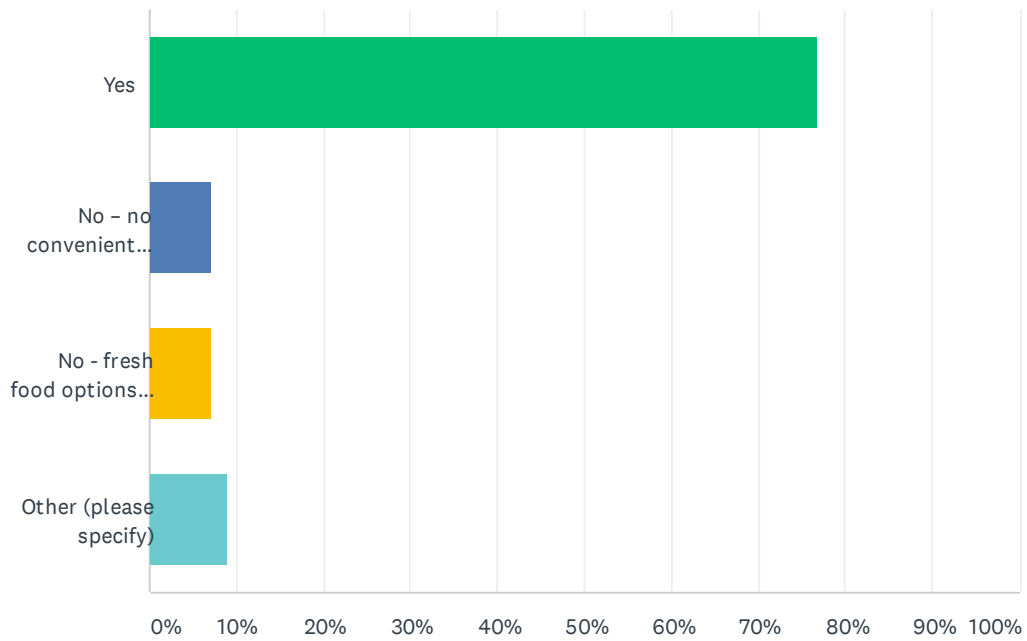
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Make presentations at Senior Centers.	11.61%	13
Reach out to youth at schools and libraries.	24.11%	27
Use technology more for communications (i.e. Facebook live or virtual town halls)	66.96%	75
Put notifications in grocery stores, schools, and other public places.	40.18%	45
Use faith and community leaders	23.21%	26
Other (please specify)	28.57%	32
Total Respondents: 112		

### Q13 Is it easy for you to access affordable healthy food? If not, why not?

Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	76.79%	86
No – no convenient shops near my house.	7.14%	8
No - fresh food options are not affordable.	7.14%	8
Other (please specify)	8.93%	10
<b>TOTAL</b>		<b>112</b>

Q14 Is there anything else you would like to share about the future of Highland? Questions to consider: - Are you satisfied with your current housing situation? Why or Why Not. - Do you feel prepared for a natural disaster (examples: heat waves, earthquakes, wildfires, etc.)? Why or Why not?

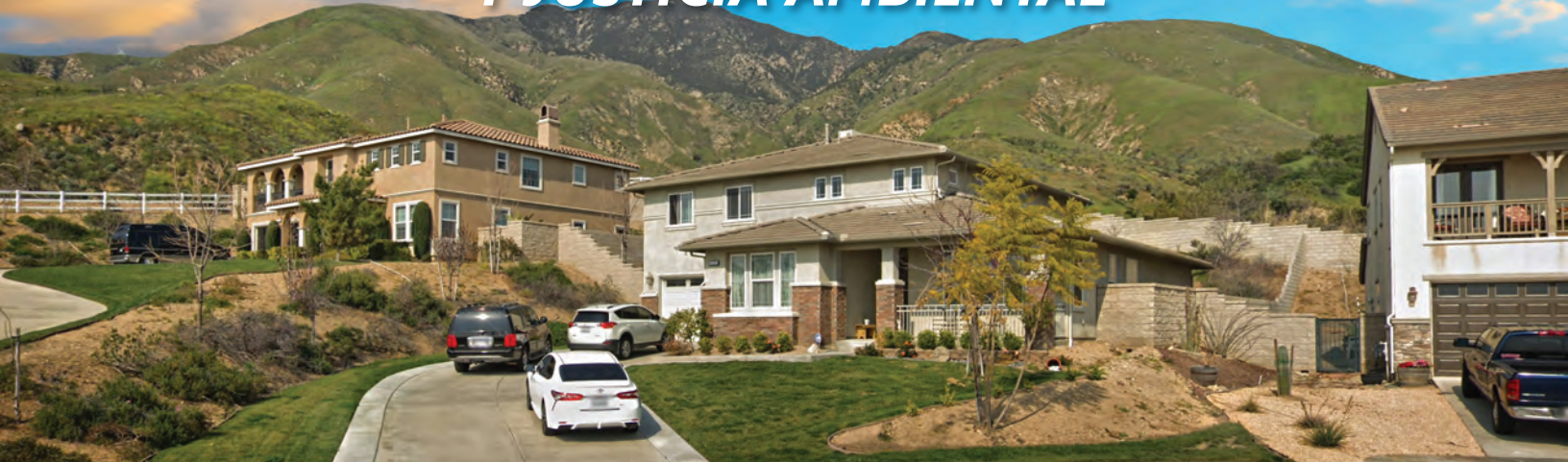
Answered: 91 Skipped: 21

## 2.2 Community Outreach Workshop

A virtual community outreach workshop was held on November 12, 2020, which allowed interested parties to be engaged in a more formal setting where they learned about the planning process, the components of the Housing Element, the importance of their role in the development of the plan. Although the presentation below is in English, during the meeting, the information was presented both in English and Spanish [**Exhibit B**].

# HOUSING ELEMENT AND PUBLIC HEALTH, SAFETY, AND ENVIRONMENTAL JUSTICE ELEMENT UPDATE

## ACTUALIZACIÓN DEL ELEMENTO DE VIVIENDA Y ELEMENTO DE SALUD PÚBLICA, SEGURIDAD Y JUSTICIA AMBIENTAL



### HOUSING ELEMENT/ELEMENTO DE VIVIENDA



The City of Highland is currently updating the Housing Element of the General Plan for 2021-2029. The purpose of the City's Housing Element is to plan for the housing needs of Highland's existing and future residents. The foundation for the Housing Element is the Regional Housing Needs Assessment (RHNA), in which the State estimates housing needs for all income groups for the upcoming eight years.

*La Ciudad de Highland está actualizando el Elemento de Vivienda del Plan General 2021-2029. El propósito del Elemento de Vivienda de la Ciudad es planificar las necesidades de vivienda de los residentes actuales y futuros de Highland. El elemento de vivienda se basa en la evaluación de las necesidades de vivienda regionales (RHNA), en la que el Estado estima las necesidades de vivienda para todos los grupos de ingresos para los próximos ocho años.*

### PUBLIC HEALTH, SAFETY AND ENVIRONMENTAL JUSTICE ELEMENT/ ELEMENTO DE SALUD PÚBLICA, SEGURIDAD Y JUSTICIA AMBIENTAL



The City is also updating the Public Health, Safety and Environmental Justice Element, which discusses natural and man-made hazards present in the community and includes goals and policies to address those hazards. This Element will be updated to include factors of equity and environmental justice.

*La Ciudad también está actualizando el Elemento de Salud Pública, Seguridad y Justicia Ambiental. El Elemento analiza los peligros naturales y los peligros creados por el hombre que están presentes en la comunidad e incluye metas y políticas para abordar esos peligros. Este Elemento se actualizará para incluir factores de equidad y justicia ambiental.*

**We need to hear your voice!**

English meeting

**November 12**

**6-7 PM**

**¡Queremos escuchar de ustedes!**

Junta en español

**12 de Noviembre**

**6-7 PM**

**Register/Regístrese**

[rebrand.ly/HighlandHousingSafetyMeeting](https://rebrand.ly/HighlandHousingSafetyMeeting)

Please also take our online survey here

**Responda a nuestra encuesta en línea aquí**

<https://www.surveymonkey.com/r/J2ZC9PJ>



# Exhibit B



## City of Highland's Housing, Safety & Environmental Justice Elements Update

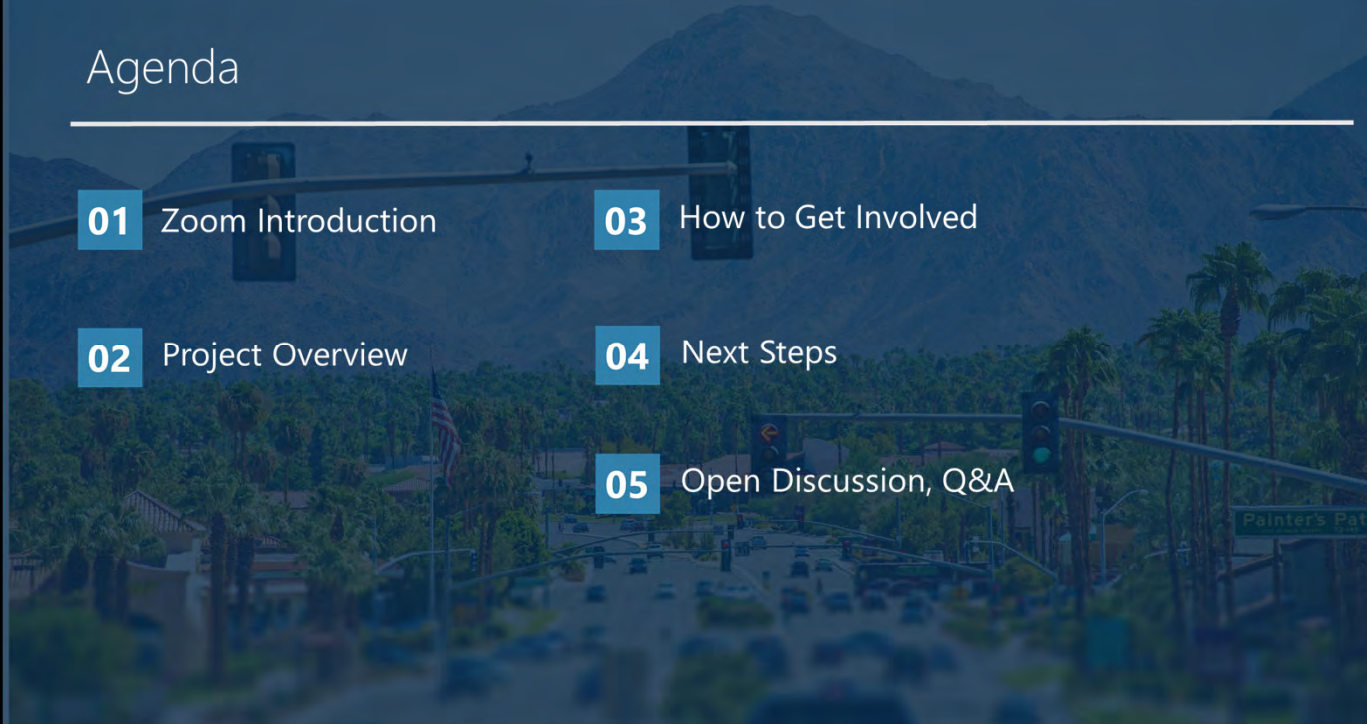
COMMUNITY OUTREACH MEETING NO. 1 NOVEMBER 12, 2020

1

## Agenda

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<b>01</b> Zoom Introduction	<b>03</b> How to Get Involved
<b>02</b> Project Overview	<b>04</b> Next Steps
	<b>05</b> Open Discussion, Q&A



2

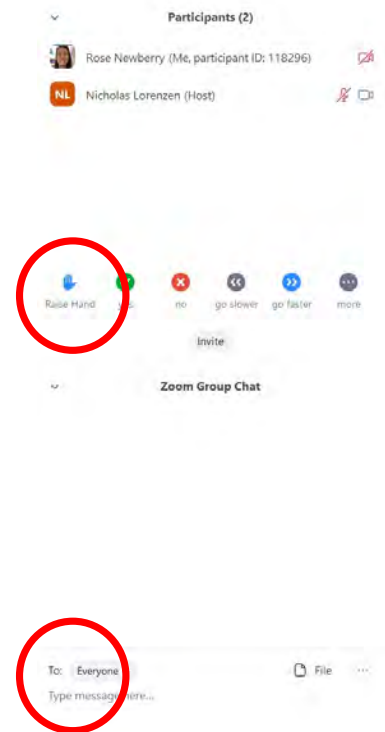
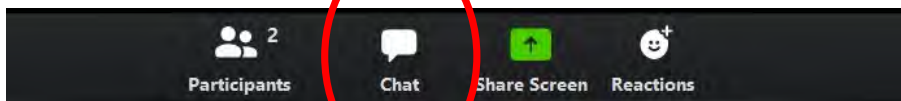
# 01

# Zoom Introduction

3

## Zoom Introduction

- Please note that everyone is muted
- You may use the "Raise Hand" feature to talk
- Use "Chat" to submit any questions for Q&A



4

## Meet the Team



**SALVADOR QUINTANILLA**

City Project  
Manager

**KIM STATER**

Assistant Community  
Development Director

**LARRY MAINEZ**

Community  
Development Director

## DUDEK

**ASHA BLEIER**

Dudek Project  
Manager

**SHANNON WAGES**

Housing Lead

**ROSE NEWBERRY**

Safety and Environmental  
Justice Lead

**ERIKA VAN SICKEL**

Housing Planner &  
Spanish Translator

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02

## Project Overview

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## Project Overview

### Housing Element



Required Element  
of the General Plan  
since 1969

Every Jurisdiction  
must accommodate  
their "fair share" of  
housing

Must be updated  
every 8 years, next  
cycle is 2021-2029

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## Project Overview

### Housing Element



1 - Regional Housing  
Needs Allocation (RHNA)



2 - Adequate Sites  
Inventory



3 - Constraints and  
Barriers



4 - Goals, Policies and  
Implementation  
Programs

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## Project Overview

### Housing Element



Complete Housing Element

HCD Submittal and Review

Annual Reporting on progress to meet RHNA

Enforcement

9

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## Project Overview

### Questions to Consider:



- Why do you live in Highland?
- What is the #1 housing issue that has impacted you, your friends or your family?
- What type of housing do you live in? What type of housing would you like to see more of in your community?

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## Project Overview

# Public Healthy, Safety and Environmental Justice Element



## Why update the City's Health and Safety Element

- Address climate change vulnerabilities and other emerging hazards

## What is Environmental Justice?

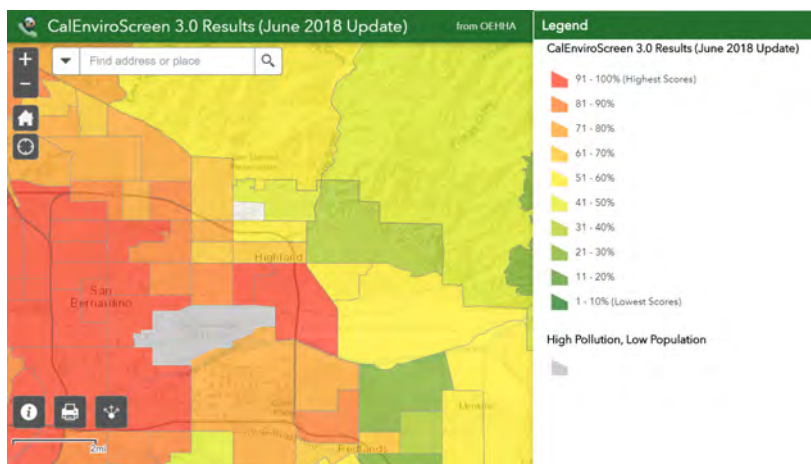
- The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of laws, regulations, and policies. This goal will be achieved when everyone enjoys:

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## Project Overview

# Public Healthy, Safety and Environmental Justice Element



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## Project Overview



### Questions to Consider:

- What public facilities, improvements or programs are needed in your neighborhood?
- What areas of the City have pollution, such as air pollution, and how could this be improved?
- What should the City do to address safety or other health related issues in the City?

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03

## How to Get Involved

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## How to Get Involved

### Outreach Opportunities

- Virtual Meetings (English & Spanish)
- Stakeholder Interviews
- Online Survey (English & Spanish)
- City's Website, Facebook, Nextdoor
- Contact City Project Manager:

Salvador Quintanilla

[squintanilla@cityofhighland.org](mailto:squintanilla@cityofhighland.org)

(909) 864-6861, Ext. 259



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04

# Next Steps

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## Next Steps

**We are early in the process...**



COLLECTING GIS  
DATA



DEFINING  
COMMUNITY  
PRIORITIES



CONDUCTING  
STAKEHOLDER  
INTERVIEWS

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## Next Steps



PLAN  
PREPARATION



PUBLIC  
REVIEW



ADDRESS  
COMMENTS



PUBLIC HEARINGS



HCD SUBMITTAL

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05

# Open Discussion

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# Thank You

Contact for questions or  
comments:

Salvador Quintanilla

[squintanilla@cityofhighland.org](mailto:squintanilla@cityofhighland.org)

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### 2.3 Planning Commission and City Council Joint Session Public Meeting

A public joint session of the Planning Commission and the City Council occurred on June 8, 2021. Council and Commission members were provided an overview of Housing, Public Health and Safety, and Circulation Elements, as well as associated requirements, components, and needs assessment findings. A copy of the PowerPoint Presentation is provided below [**Exhibit C**].



# Exhibit C

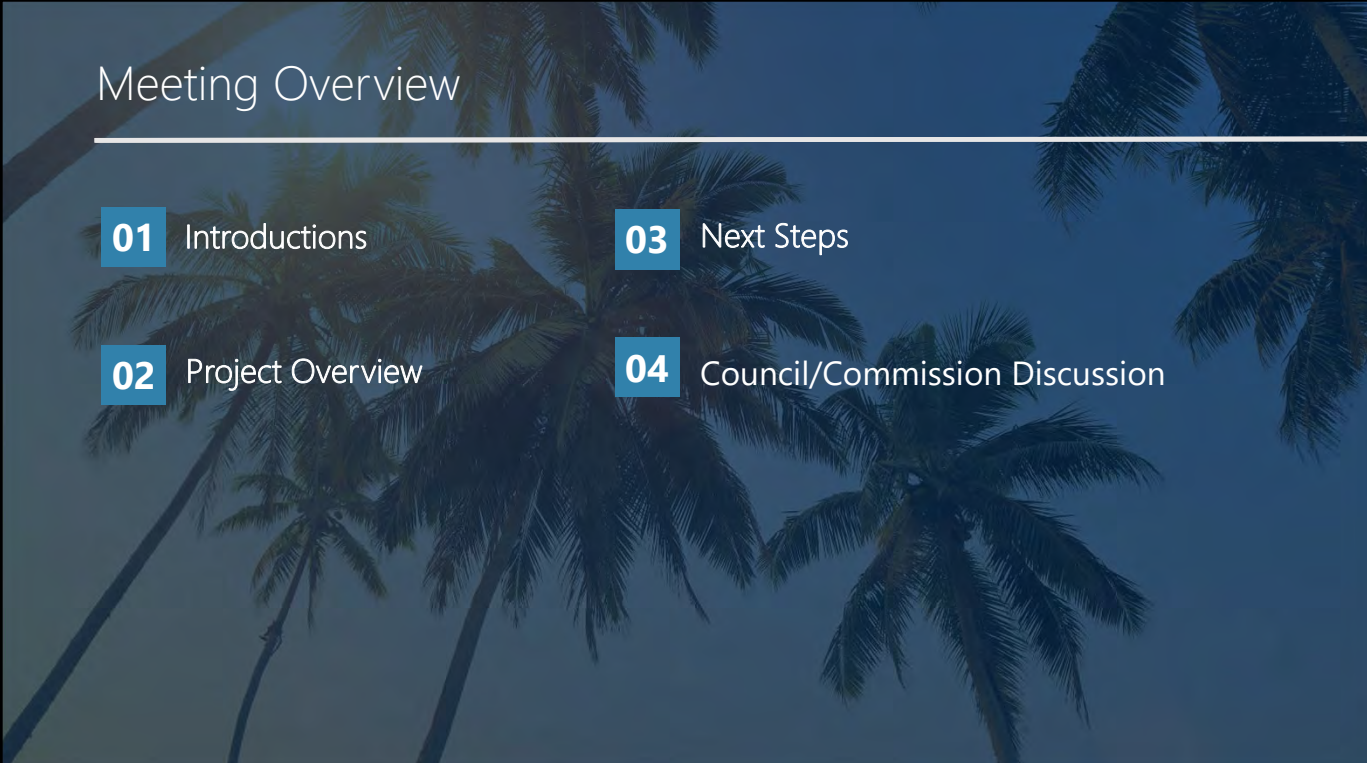


City of Highland  
Housing, and Public Health, Safety &  
Environmental Justice Elements

JOINT CITY COUNCIL/PLANNING COMMISSION MEETING

JUNE 8, 2021

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## Meeting Overview

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- 01** Introductions
- 02** Project Overview
- 03** Next Steps
- 04** Council/Commission Discussion

2

01

# Introductions

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## Meet the Team



**LAWRENCE MAINEZ**  
Community  
Development Director

**KIM STATER**  
Assistant Community  
Development Director

**SALVADOR QUINTANILLA**  
Associate Planner

**DUDEK**

**ASHA BLEIER**  
Project Manager

**ERIKA VAN SICKEL**  
Lead Planner

**ELIZABETH DICKSON**  
Planner

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# 02

## Project Overview

### What is a SAFETY ELEMENT?

A set of goals, policies, and actions that address both natural and human caused hazards related to air pollution, extreme heat, flooding, earthquakes, hazardous materials, wildfires, and the potential role of climate change.

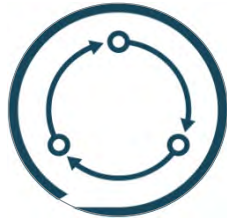


## What is the purpose of the Safety Element?



### Mitigation

- Reducing or stabilizing the hazard



### Preparedness

- Readiness in the event of an emergency



### Response

- Stabilizing an emergency event



### Recovery

- Steps to build back better after an event



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## What are Highland's Risks?

Potential Impact	High		Wildfire	Air Pollution
	Medium	Safe Walking and Biking	Flooding Geologic Hazards	Extreme Heat
	Low			Hazardous Materials
		High	Medium	Low
		Adaptive Capacity		

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## CIRCULATION ELEMENT Amendment

### *Three (3) Street Segments*

**Cone Camp Road Extension** – elimination of the street segment through the Santa Ana River

**Base Line** – elimination of the street segment connecting from Red Hill to Alta Vista

**Greenspot Road Extension to Bryant Street** – modify this regional connector into a looping road, connecting back to Garnet Street Bridge

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## What is the ENVIRONMENTAL JUSTICE ELEMENT?

### *What is Environmental Justice?*

The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of laws, regulations, and policies.

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# What is the ENVIRONMENTAL JUSTICE ELEMENT?

## What is the purpose of the Environmental Justice plan?



Improve health, air quality, food choices, parks, safety, streets, sidewalks in environmental justice communities (EJCs).



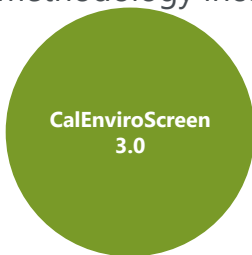
Promote getting involved in your local government so you can affect change for your *neighborhood*.



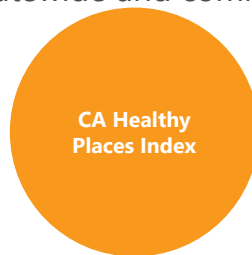
Making improvements happen through programs.

# Identifying Environmental Justice

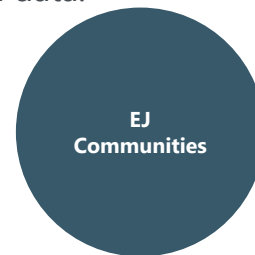
Within the City's jurisdiction, EJCs are identified through a customized methodology incorporating statewide and community-level data:



Low-income communities with pollution burden score 75% or above.



Address wellness and equity for EJCs of the City.



Examine existing conditions for population characteristics, socioeconomic opportunity, environmental conditions, and health and vulnerability factors.

## What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029)

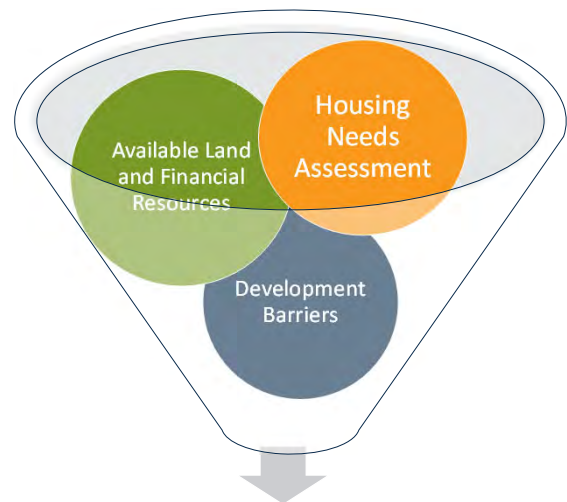


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## What are the components of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Analyze and further Fair Housing
- Identify sites available for housing
- Identify programs and actions to meet the needs
- Facilitate housing production on sites identified

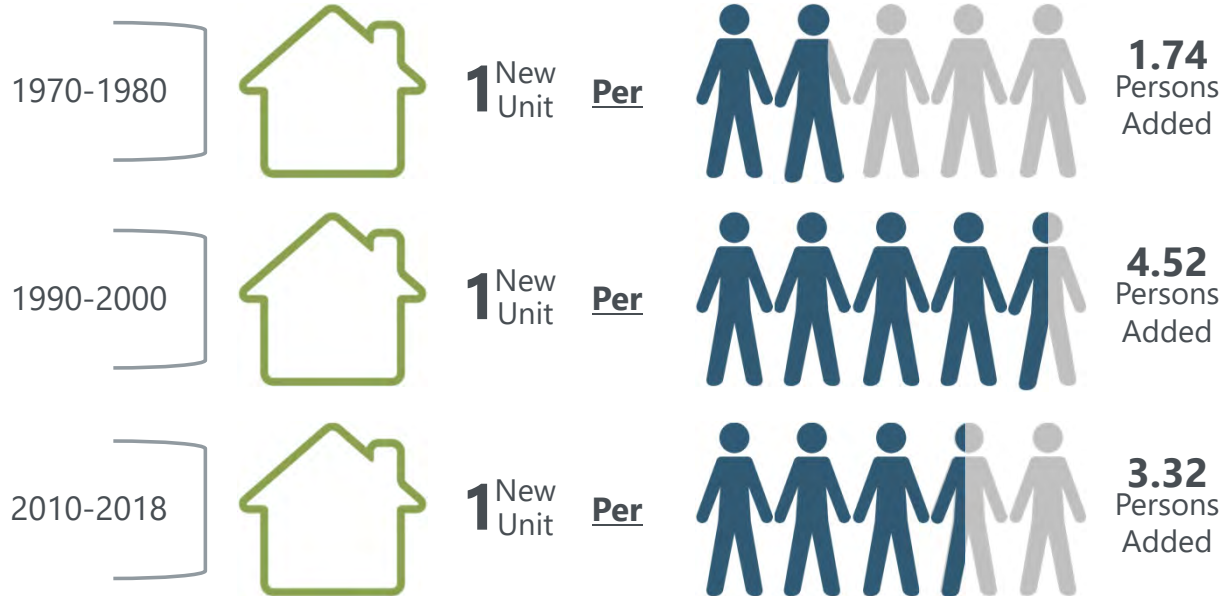


Housing Action Plan

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## What does the data show?



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## What does the data show?

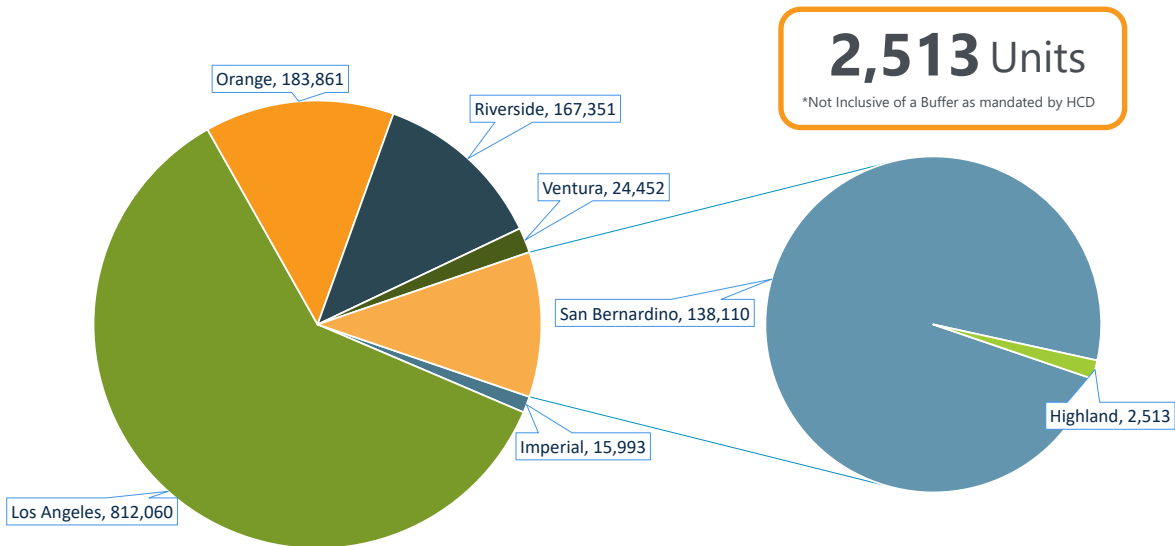


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## How many housing units does Highland have to plan for?



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## Low- and Moderate-Income Households



- **Lower-Income Households:** Total annual income is 80% or less of the AMI.
  - Those that earn \$63,200 or less annually
- **Moderate-Income Households:** Total annual income is between 80-120% of AMI.
  - Those that earn no more than \$93,000 annually.

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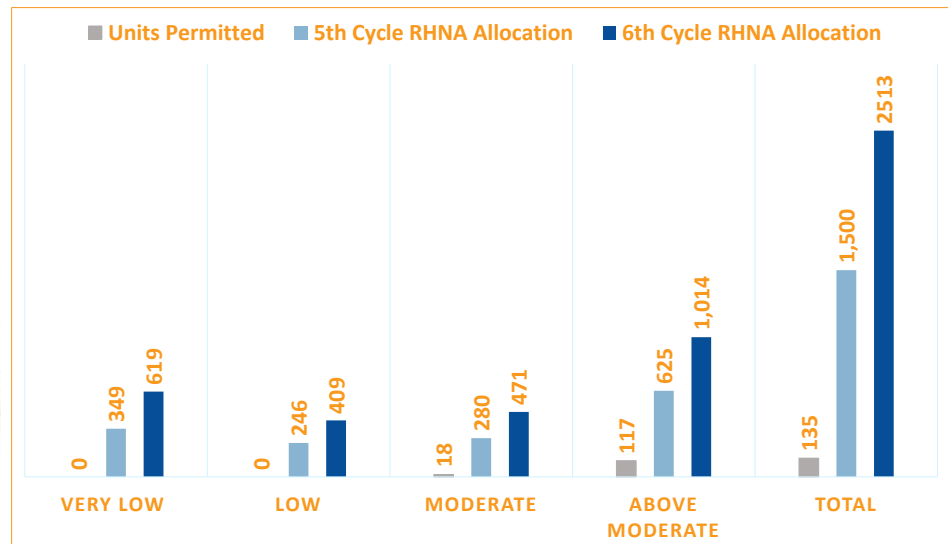
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# 5<sup>th</sup> Cycle RHNA Progress

Data Reported 2014-2019

5<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year = 22.5

6<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year Needed  
= 314



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## Addressing the RHNA Allocation

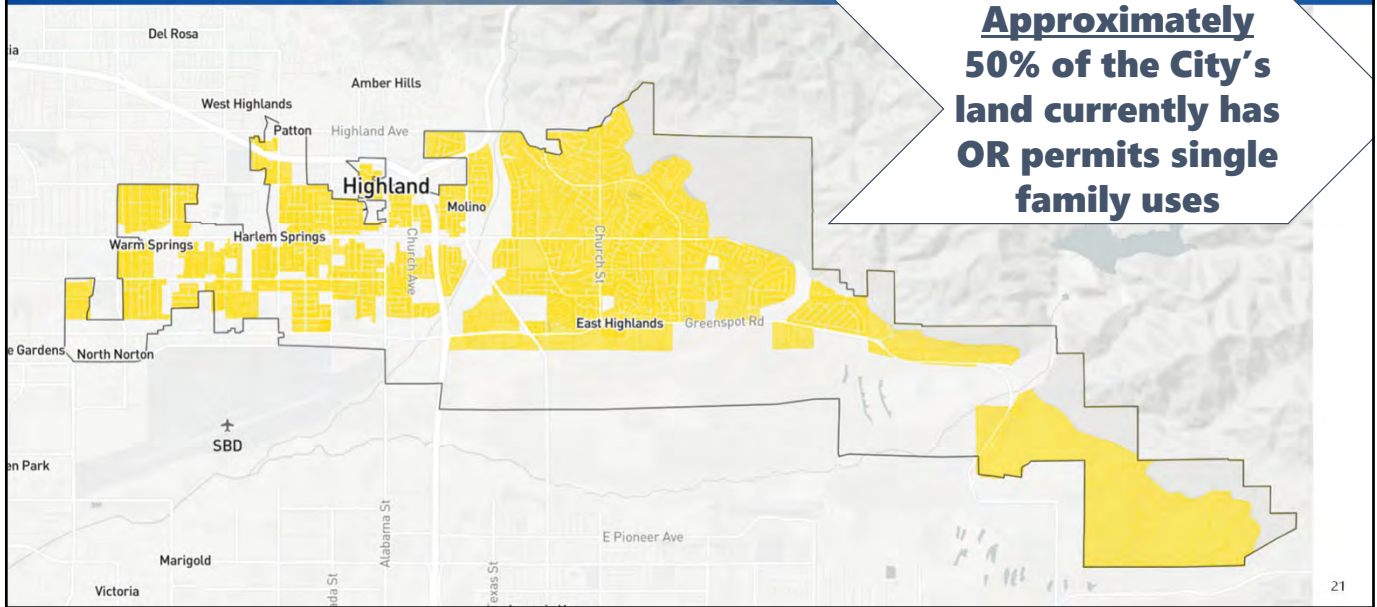
### Site Inventory Requirements

- Vacant Sites/Underutilized
- Size Constraints - 0.5 acres – 10 acres
- IL Ratio – Structure Value compared to Land Value
- Building Age – 1970's and older
- Minimum Densities – 30 du/ac for lower-income sites
- Realistic Capacity – must be based either on:
  - Past density trends near max allowable density in zone;
  - Or Minimum densities

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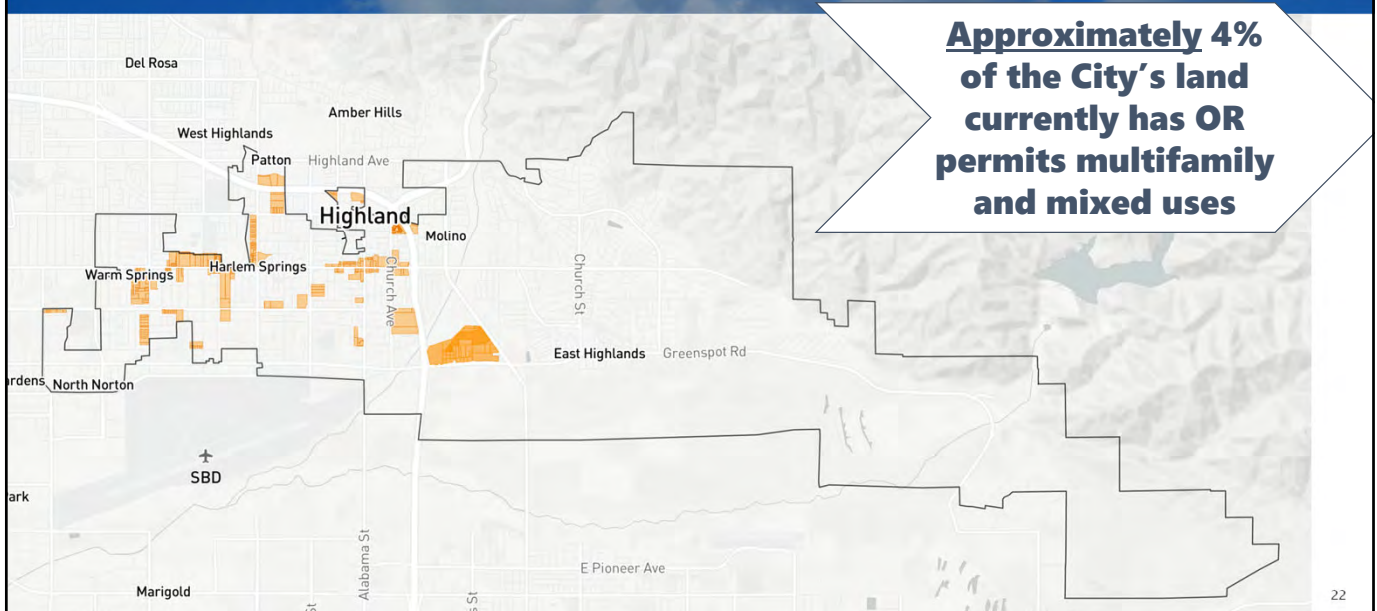
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## Where are we today?



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## Where are we today?



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## Tools in the Toolbox



### Regulations

By-Right Processing

Objective Design Standards

Not Net Loss

### Incentives

Density Bonus

Streamlining

Regulatory Relief

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# 03

## Next Steps

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## Next Steps

***We are here in the process...***



CONDUCTING  
OUTREACH



PLAN PREPARATION



PUBLIC REVIEW

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## Approval Steps



HCD REVIEW



ADDRESS  
COMMENTS



PLAN  
ADOPTION



FINAL  
CERTIFICATION

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04

# Council/Commission Discussion

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Any questions or comments?



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## Questions for Council/Commission

What have you heard from the community are the biggest **safety** issues?



## Questions for Council/Commission

What have you heard from the community are the biggest **housing** needs and priorities?





## Questions for Council/Commission

What specific barriers, challenges, or factors do you think adversely affect housing production in Highland?



**DUDEK**

Thank You



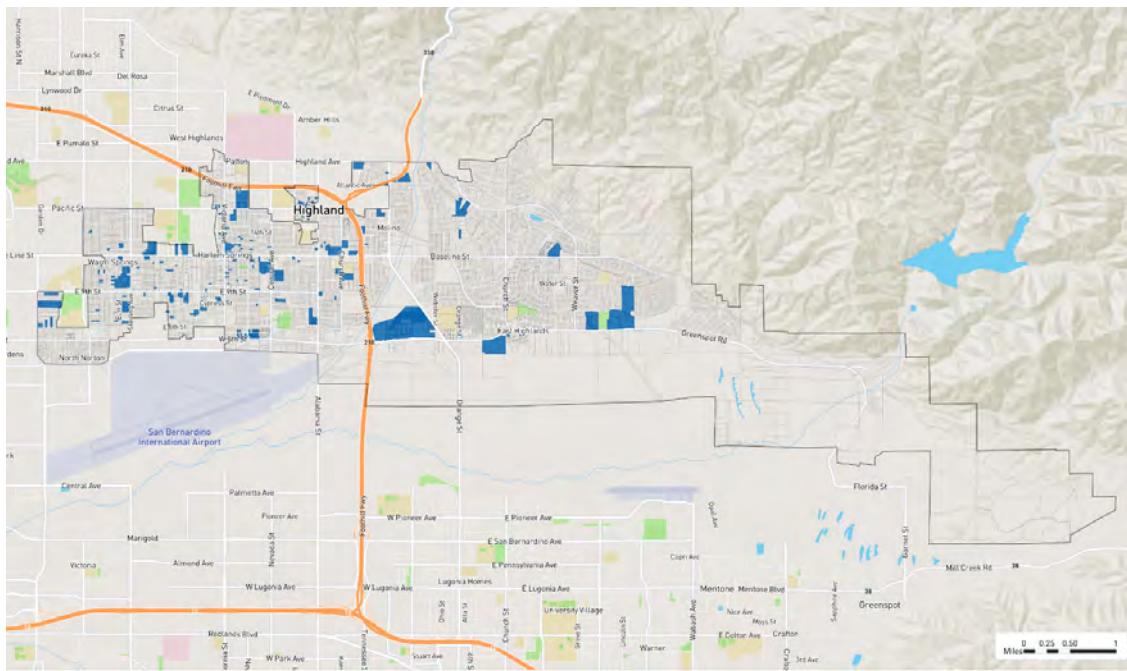
## What Happens If a Jurisdiction Does Not Comply with State Law?

- Pro-Housing Default Rule goes into effect
- General Plan deemed inadequate and invalid
- Limited access to state funding
- Private party lawsuits
- Court mandated compliance
- Suspension of local control of planning & building decisions
- Court approval of housing developments

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## Sites Inventory Mapping

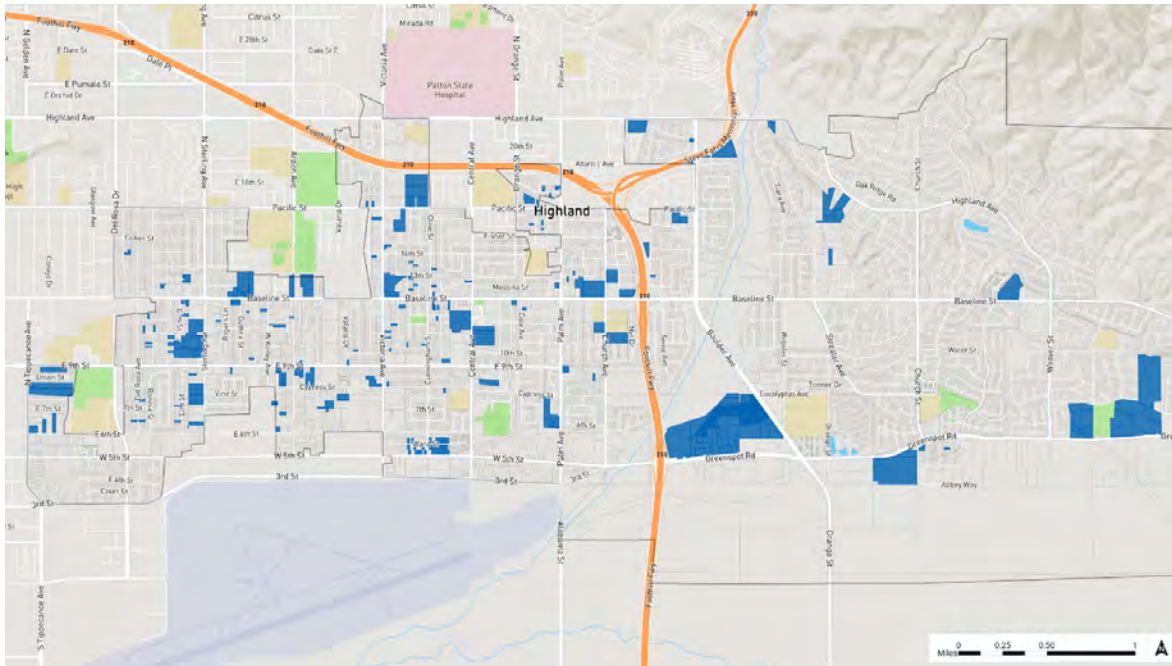


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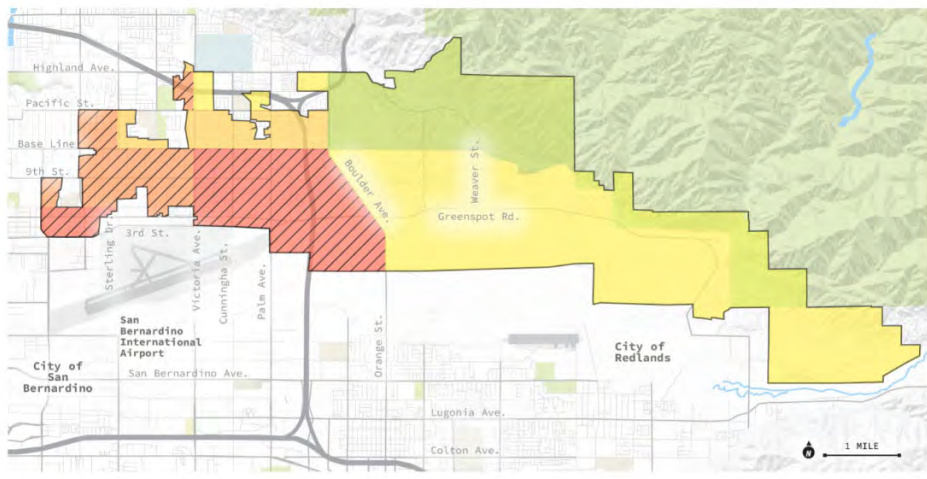
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## Sites Inventory Mapping



## CalEnviroScreen Mapping Results



- CalEnviroScreen 3.0 Results (June 2018 Update)**
- 91 - 100% (Highest Scores)
  - 81 - 90%
  - 71 - 80%
  - 61 - 70%
  - 51 - 60%
  - 41 - 50%
  - 31 - 40%
  - 21 - 30%
  - 11 - 20%
  - 1 - 10% (Lowest Scores)
- High Pollution, Low Population**

Disadvantaged Communities  
(CalEnviroScreen Score above 75)

Least Disadvantaged      Most Disadvantaged

Source: OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Accessed January 2021. <https://oehha.ca.gov/calenviro-screen/report/calenviro-screen-30>