



City of Loma Linda 2021-2029 Housing Element

City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354

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INTRODUCTION

In the past five years, the City of Loma Linda has experienced increased interest from housing developers to build new homes in the community, recognizing the charms of this small city and the ready market for all housing types created by the presence of Loma Linda University, the Loma Linda Medical Center, and a large Veterans Administration hospital. Also, the Inland Empire offers housing prices and rents generally lower than in nearby Orange and Los Angeles counties, and improved rail and bus commuter services make it easier to access more distant jobs centers.

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In 2018, the City approved The Groves Specific Plan, which plans for 1,067 new homes, roughly half of which are targeted to be affordable units. The City has experience a substantial increase of accessory dwelling unit (ADU) applications. And vacant tracts of land remain on the western side of town and central Loma Linda to accommodate new subdivisions and multi-family housing.

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This 2021-2029 Housing Element, a component of the City's General Plan, establishes the plan for accommodating housing demand within the framework of established land use policy. It identifies housing conditions and needs; sets forth goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides programs the City has committed to implement to provide an appropriate range of housing opportunities. As required by State law, this element also examines whether past land use practices have created conditions whereby people of color, persons with disabilities, or other protected classes experience discrimination in their efforts to secure suitable housing, and identifies affirmative actions the City will take to further fair housing practices.

Overview and Purpose of the Housing Element

The Housing Element identifies housing needs in Loma Linda, the sites that can accommodate these needs, and the policies and programs to assure that the housing units necessary to meet these needs can be provided. The primary goal of the Housing Element is to provide a range of housing opportunities for all income groups.

The Housing Element covers the period of October 15, 2021 to October 15, 2029 and sets forth strategies and programs to: 1) encourage the development of a variety of housing opportunities, 2) provide housing opportunities for persons of lower and moderate incomes, 3) preserve the quality of the existing housing stock in Loma Linda, 4) minimize governmental constraints, and 5) promote equal housing opportunities for all residents.

By law, the Housing Element must contain these following major components:

- An analysis of demographic and housing characteristics and trends
- A review of potential market, governmental, and environmental constraints to meeting identified housing needs
- An evaluation of land, administrative, and financial resources available to address the housing goals

2021-2029 Housing Element

- A review of past accomplishments under the previous Housing Element
- A housing plan to address the identified housing needs, including housing goals, policies, and programs
- An analysis of fair housing conditions and a plan to affirmatively further fair housing practices

The California Government Code also requires that General Plans contain integrated, consistent sets of goals and policies. The Housing Element is, therefore, affected by development policies contained in the Land Use Element and Circulation Element. The Housing Element is internally consistent with the balance of the General Plan. As portions of the General Plan are amended in the future, each of the elements of the General Plan, including the Housing Element, will be reviewed to ensure internal consistency is maintained.

Demographic Overview

The Housing Needs Assessment (Appendix A) provides a comprehensive overview of Loma Linda's population, household, and housing stock characteristics, and analyzes these factors to identify housing needs of the variety of household types and special needs across the City. The Needs Assessment indicates that local households earn lower incomes than households countywide and issues with affordability of housing persist. Specifically:

- The median household income in Loma Linda is \$55,607 according to 2019 Census data, lower than the median household income for San Bernardino County (\$67,903). This is the reverse of the case during the fifth housing element cycle, when Loma Linda households earned substantially higher than the countywide median.
- Due to the large student population, 61.6 percent of households live in rental housing.
- Forty percent of households are considered lower-income households, meaning these households earn 80 percent or less of the area median income (AMI) for the County.
- Close to half (47 percent) of renters pay over 30 percent of their income for housing (compared to 27 percent of owners).
- Median home sale prices in Loma Linda were higher than in neighboring and surrounding jurisdictions and San Bernardino County as a whole.
- Single-family home ownership is beyond the reach of low- and moderate-income households. For home ownership, some of these households may be able to afford a condominium, but the unit may not be adequately sized for them. In the rental market, generally only moderate-income households cannot afford the market rents in Loma Linda without experience cost burden (paying over 30 percent of their income for housing).

Like other cities, Loma Linda has a special needs population that has more difficulty finding decent, affordable housing due to their special circumstances. In particular:

- According to Census data, 13.8 percent of all residents are disabled.
- Elderly residents make up 21 percent of all residents and 25 percent of all households.
- 3,212 Loma Linda residents—13.3 percent— are students.

These data indicate clear need for affordable housing for the elderly, disabled, and students. For the elderly and disabled, housing equipped with handicapped access and facilities is important.

Housing Constraints

Governmental, infrastructure, environmental, and market factors may constrain the provision of adequate and affordable housing. State law requires that Housing Elements analyze potential and actual governmental and non-governmental constraints to the production, maintenance and improvement of housing for all persons of all income levels and disabilities.

While governmental regulations are established to protect the health and safety of residents, they also set limits on residential development. These regulations include zoning, land use entitlement processing, and growth limits. Specific constraints to housing development in Loma Linda include:

- In 2006, City voters put into place measure V to protect hillside and open space areas by restricting single-family residential densities in the foothills and establishing a minimum 7,200-square-foot lot size for all R-1 lots.
- All residential projects in the R-2, R-3, and R-4 zones are subject to Planning Commission review and approval, although the City anticipates adopting more streamlined processes to comply with State law by early 2022.

Market conditions also pose significant constraints, including high land, construction, and financing costs. Also, restricted financing availability is of concern, although the City has little ability to reduce these constraints.

Meeting the Regional Housing Needs Assessment (RHNA)

A core component of the Housing Element is the Regional Housing Needs Assessment, or RHNA. The RHNA, developed through a process directed by the Southern California Association of Governments, represents the number of housing units—divided into various household income categories—that have been calculated to represent Loma Linda’s “fair share” of the regional housing need during the Housing Element planning period. By law, the City is required to show in the Housing Element that adequate sites are available in Loma Linda to accommodate the construction of new housing units consistent with the RHNA. Recognizing that development is often constrained by the market and environmental and other factors, the law makes no mandate that these units actually be built. Rather, housing law merely requires that the City do its part to facilitate housing construction by identifying “adequate sites.”

Loma Linda’s RHNA for the 2023-2029 planning period has been determined by SCAG to be 2,051 housing units, including 523 units for extremely/very low-income households, 311 units for low-income households, 352 units for moderate-income households, and 865 units for above moderate-income households. As noted above, the City has received and processed applications for several housing developments since the 2018 approval of The Groves Specific Plan. Approved and pipeline projects account for 583 units that can be credited toward this Housing Element planning period. Thus, in this element the City identifies strategies and sites sufficient to accommodate the remaining RHNA of 1,468 units without having to rezone properties.

Policies and Programs

Housing policies and implementing programs (with multiple action items each) have been developed in response to the analysis. A summary of actions—including identification of funding sources, responsible entities, and time frames for implementation—is also presented. They are organized under the following goals:

1. Provide adequate sites to meet the 2021-2029 RHNA.
2. Assist in the development of housing to meet the needs of households of all incomes and special needs households.
3. Address and where appropriate, and legally possible, remove governmental constraints to housing development.
4. Conserve, preserve, and improve the condition of the existing affordable housing stock.
5. Promote equal housing opportunity.
6. Promote sustainable development approaches.

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The goals and corresponding policies and programs address the objectives required by and delineated in State law (California Code Section 65583 [c][1]).

Public Engagement

The Loma Linda community provided input into this Housing Element through a series of focus group meetings, a community workshop, and study sessions with the Planning Commission and City Council. On February 10 and 16, 2021, the City conducted two focus group meetings. Invitees to both meetings included local and regional housing services providers, representatives from transitional and supportive housing, affordable and market-rate housing developers, and neighborhood representatives. The representatives from transitional and supportive housing spoke largely on behalf of lower-income households. Spanish-language translation services were available at the workshops, although no participants required these services. Following publication of the Housing Element, the City emailed workshop participants to inform them that the draft element was available for review on the City's website and of adoption hearing dates.

City staff extended 50 invitations to community stakeholders, following up with email reminders the day prior to each meeting. Representatives from the following organizations participated:

- Adventist Community Team Services
- Highpointe Communities
- Homeowner Associations
- Inland Housing Solutions
- Inland SoCal United Way
- Lennar Homes
- Loma Linda Fire Department
- Loma Linda University
- Mary's Mercy Center
- Mary Erickson Community Housing
- Option House
- Salvation Army Redlands Corps

- San Bernardino County Housing Authority
- St. Joseph the Worker Catholic Church

Participants offered the following comments:

Most Significant Housing Challenges in Loma Linda

- Lack of affordable housing
- Rising instances of homelessness and inability of service providers to locate temporary housing for their clients
- Availability of safe and affordable housing
- Inability of lower-income families to accumulate wealth in the form of real estate since they cannot afford to buy homes. This has long-term economic effects, as seniors do not have a supplemental source of retirement income.
- The income limits for covenanted affordable housing: People earning \$15-\$20 an hour do not qualify because they make too much money, but neither can they afford market-rate housing.
- The City needs more transitional housing to allow people to work their way back up the economic ladder.

Constraints to Developing Additional Housing

- Archaic zoning rules. For example, in Loma Linda tiny houses are not allowed.
- Legislative policies
- Public perception of homelessness—who is homeless—and their housing needs. Creates a “not in my back yard” (NIMBY) attitude.
- Cost of construction for all housing types
- Discretionary approval processes that take a long time
- Development fees of almost \$50,000 per unit. The fees apply to all types of housing regardless of size.
- Limitations on how federal grants can be spent. For example, shelter funds are severely restricted and do not allow development of transitional housing.

Housing Discrimination

- Persons using shelters and victims of domestic violence often have poor credit and job histories this works against them in their search for safe and decent housing. When seeking housing, they often have to share their stories, and landlords use the information to deny applications.

Opportunities to Encourage Housing Production and Addressing Other Housing Needs

- Tax lien sales that allow housing developers to acquire properties at lower cost
- Public education about homelessness causes, impacts, and affected populations. Homelessness does not define a person; it’s a stop along their way to self improvement.
- Embracing new home typologies: tiny homes, manufactured and modular housing
- Use of vacant lots owned by the City
- Encouraging Loma Linda University to construct student and faculty housing on its campus
- Accessory dwelling unit regulations that are “friendly”
- Hotel/motel conversions to housing

- Designated sites for affordable housing that will allow applications to be processed with minimum delay and hassle

Other Comments

- Loma Linda is a great environment: access to transit, access to medical care, access to jobs. This is a place that anyone—of any income level—should be able to enjoy as a resident.
- Inland Equity Community Land Trust is building its housing to leverage its capacity to help homeless, renters, and in the future, homeowners. They should be encouraged to join the local discussion and work to leverage their investments.
- Need to remember that transportation is important: people need easy access to transit and resources. Keep in mind when looking for locations for new housing.
- Loma Linda University should be encouraged to be a resource and partner in meeting local housing needs.
- The City has been overbearing regarding services to homeless persons (soup kitchens in particular) and responds more readily to business owners' complaints about the operations (rather than work things out with the operator). This is challenging for service providers.

In response to these comments, the City has included, for example, programs to facilitate special needs housing and transitional/supportive housing.

On March 9, 2021, the Planning Commission and City Council hosted a joint workshop to hear from residents regarding housing concerns and ideas for meeting housing needs. Once the draft goals and policies and sites inventory had been completed, City staff presented the materials to the Planning Commission on June 2, 2021 and the City Council on July 13, 2021. The public was invited to participate in these sessions and review the materials prior to submission of the draft Housing Element to the Department of Housing and Community Development. Copies of the Housing Element were made available via the City's website and at the City library.

HOUSING PLAN

This Housing Element provides the framework for decision making regarding the construction of new housing units, preservation of existing housing, and providing services that allow people of all income ranges to have equal access to housing opportunities. The Housing Element sets forth long-term goals and policies that work together with the General Plan Land Use Element and other elements to move Loma Linda forward. A summary of actions—including identification of funding sources, responsible entities, and time frames for implementation—is also presented.

The Housing Element goals, policies, and programs aim to:

- Provide adequate sites to meet the 2021-2029 RHNA
- Assist in the development of housing to meet the needs of lower-income households
- Address and where appropriate, and legally possible, remove governmental constraints to housing development
- Conserve, preserve, and improve the condition of the existing affordable housing stock
- Affirmatively further fair housing
- Promote environmental sustainability

The plan also aims to reflect the values and preferences of the Loma Linda community. Through stakeholder interviews and community-oriented Planning Commission and City Council study sessions, the City heard the concerns and suggestions of community residents, local service providers, housing developers, housing interest groups, community organizations, and the Chamber of Commerce. Several themes emerged that the City has addressed in this plan.

This Housing Plan focuses on goals, policies, and programs that meet State law requirements and can realistically be accomplished based on current funding and staffing levels. This does not preclude the City from undertaking additional program actions not included in this Housing Plan if they are consistent with the goals and policies established here and throughout the General Plan.

Housing Opportunities

Goal 1: Enhanced housing opportunities for all Loma Linda residents

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| Policy 1.1 | Provide a range of housing types and unit sizes to meet the needs of households with varying income ranges and in all life stages. |
| Policy 1.2 | Facilitate the provision for housing which meets the needs of residents with special housing needs, including the elderly, disabled, large families, the homeless, and students. |
| Policy 1.3 | Encourage mixed-use development consistent with land use policy to increase the housing supply. |
| Policy 1.4 | Require that master-planned developments include a mix of housing types and densities. |

- Policy 1.5 Work with Loma Linda University and the Loma Linda Medical Center to encourage housing development on their properties.
- Policy 1.6 Consider allowing religious institutions to construct affordable housing on their properties.
- Policy 1.7 Monitor applications for accessory dwelling units (ADU) to determine whether additional measures are needed to encourage ADU production.

Program 1.1: Adequate Sites

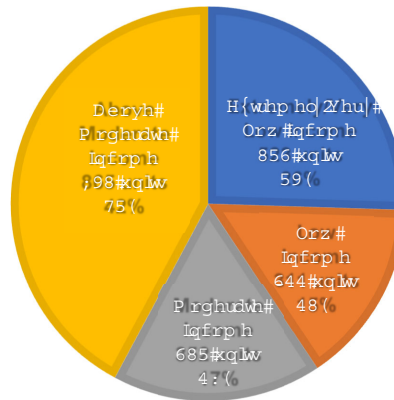
The City of Loma Linda has been allocated a Regional Housing Needs Assessment (RHNA) target of 2,051 new housing units, distributed among four income categories: very low, low, moderate, and above moderate. The inventory of sites to accommodate this RHNA consists of vacant properties zoned for residential use, developed properties that have potential to be redeveloped at higher residential densities, properties owned by religious institutions that have surplus parking areas capable of supporting residential development, and accessory dwelling units (ADUs). The inventory includes one large development site in to be annexed to the City in 2022. Existing General Plan land use policy and zoning establish capacity sufficient to support this level of development and at densities that support development of lower- and moderate-income units.

In 2021, the City approved a series of General Plan and Development Code amendments that, among other updates, created a combined General Plan/Zoning map, thereby creating consistency between land use designations and zoning and streamlining the ability of a developer to move forward with development applications.

Actions:

- Continue to provide appropriate land use designations and maintain an inventory of suitable sites for residential development.
- Establish a means to track all housing sites in the inventory to guard against no net loss of sites identified as suitable for lower-income housing development consistent with Government Code Section 65863.
- Provide technical assistance and information on available City-owned parcels for lower-income developments to private or non-profit housing providers.

2021-2029 RHNA



- Maintain a database of available housing sites and conduct targeted outreach to multifamily housing developers to promote private development and redevelopment efforts.
- Explore the feasibility and research the appropriate regulatory means that would allow religious institutions to construct affordable housing on their properties. Potential means include a religious institution/congregational overlay zone or a special permit process.
- Diligently pursue annexation of the Canyon Ranch property.
- Amend the zoning code to allow by right—not subject to any discretionary review—residential developments in which at least 20 percent of the housing units are affordable to lower-income households.
- Establish a lot consolidation program to incentivize the combination of adjacent R-3 zoned lots in common ownership for development of multifamily housing. The ordinance can include such incentives as a density bonus, modified development standards, and/or expedited processing.
- Work with Loma Linda University and the Medical Center to develop a specific plan for Special Planning Area (SPA) C that includes a variety of housing types, with housing permitted as a by-right use.

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- Timeframe:**
- a) Implementation and annual reporting throughout the planning period
 - b) Establish no-net-loss tracking within one year of Housing Element adoption and continuously track upon adoption
 - c) Technical assistance and database: Ongoing
 - d) Religious institution housing: By 2026
 - e) Annex the Canyon Ranch property by end of 2022 (dependent upon Local Agency Formation Commission annexation process)
 - f) Establish a lot consolidation program by 2024
 - g) Plan for SPA C by 2026

Responsible Agency: Community Development Department

Funding Sources: General Fund

Program 1.2: Accessory Dwelling Units

In 2020, the City modified its HDL permitting system to include a new ADU permit type, thus facilitating staff's ability to track ADU applications and building permit issuance. In 2021, the City adopted a new ADU ordinance that is consistent with State law. To create public awareness of the ordinance and encourage ADU production, the City will:

- Create and maintain a set of permit ready, pre-approved building plans to support ADU development and streamline the plan check process for ADUs (by 2024).
- Create a process for property owners to bring unpermitted ADUs up to code (by 2025).
- Consider reducing development fees for ADUs (in concert with regular fee review actions).
- Consider creating a one-stop assistance center for homeowners interested in developing an ADU (by 2024).
- Provide information about ADUs, which may consist of advertising ADU development opportunities on the City's website, in local newspapers, in local utility bills, and at various community centers, including the public library (by 2025).

- Monitor ADU permit applications and approvals through the Housing Element Annual Progress Report process, including monitoring for affordability. Identify and implement additional incentives or other strategies, as appropriate, to ensure adequate sites during the planning period.

Timeframe: Implementation and annual reporting throughout the planning period
Responsible Agency: Community Development Department
Funding Sources: General Fund

Housing for Households of All Income Levels and Persons with Special Needs

Goal 2: A diversity of housing types that meet evolving community needs, particularly for special needs groups

- Policy 2.1 Facilitate the development of lower- and moderate-income housing by offering developers incentives such as density bonuses, City participation in on- and off-site public improvements, and flexible development standards.
- Policy 2.2 Work with Loma Linda University and the Loma Linda Medical Center to facilitate the development of housing specifically for their workforce staff and students.
- Policy 2.3 Assist and cooperate with nonprofit, private, and public entities to maximize opportunities to develop affordable housing.
- Policy 2.4 Encourage development of housing that meets the specific needs of seniors, large families, persons living with disabilities, single-parent households, and youth transitioning out of the foster care system.
- Policy 2.4 Support the efforts of developers interested in providing housing that meets the special needs of unhoused individuals and families, including the conversion of motels/hotels to transitional and supportive housing.
- Policy 2.5 Consider establishing an ADU program that incentivizes the creation of ADUs covenanted as affordable housing.

Program 2.1: Housing Opportunities for Special Needs Groups and Lower-Income Households

Special needs groups require particular focus because often members of these groups have more limited incomes, require housing configurations and interior fixtures that accommodate mobility restrictions, and benefit from having their housing located near transit stops and supportive service providers. Actions and programs developed for special needs households similarly address the housing needs of lower-income households (low, very low, and extremely low).

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Actions:

- Give priority to development projects that include a component for special needs groups (including the elderly, disabled, large families, the homeless, students, and transitional foster youth) in addition to other lower-income households. Priority will consist of advancing applications for review ahead of development applications not addressing special needs households. Implement priority based on community needs to ensure adequate housing for all residents within special needs groups.
- Consider amendments to the Development Code that would provide density incentives outside of Density Bonus law for housing projects with 100 percent of the units reserved for special needs populations and lower-income households.
- Use a similar funding model applied to the Loma Linda Veterans' Village development—a combination of HOME funds, VASH funds, and vouchers—to facilitate housing production for other special needs populations.
- Seek the use of County Community Development Block Grant funding to leverage the efforts of affordable housing developers to build in Loma Linda.
- Work with Loma Linda University in development of its master plan for Special Planning Area (SPA) C to require a percentage of units be planned for lower-income households, with innovative housing types—such as micro units, single-room occupancy units, and share living arrangements—that can support such a requirement.

Timeframe: a) Priority processing upon receipt of applications
 b) Zoning Code amendments by 2027
 c) Funding models for special needs and affordable housing when requested by developers
 d) Plans for SPA C by 2026

Responsible Agency: Community Development Department

Funding Sources: General Fund

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Deleted: Implementation throughout the planning period...

Program 2.2: Reasonable Accommodation

The federal Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. While fair housing laws intend for all people have equal access to housing, the law also recognizes that people with disabilities may need extra tools to achieve equality.

The City currently uses the Minor Variance process to review requests for reasonable accommodations. A simpler administrative process would benefit applicants.

Actions:

- Adopt a simple ministerial process for reviewing requests for reasonable accommodation and modest deviations from Development Code requirements needed to address needs for people with disabilities.
- Provide information to residents on reasonable accommodation procedures via public counters and the City website.

Timeframe: By end of 2022
Responsible Agency: Community Development Department
Funding Sources: General Fund

Program 2.3: Affordable Housing Development

Both for-profit and non-profit developers can provide affordable housing in Loma Linda. While the City has very limited resources to help fund development and/or provide land, the City can assist by expediting applications, reducing fees, and allowing additional building height and/or density bonuses beyond those allowed by State statutes—or as a matter of right rather than as a concession/waiver pursuant to density bonus law.

Actions:

- Create a database of sites to help developers identify suitable sites for affordable residential and mixed-use developments.
- Develop a process that expedites the processing of affordable housing applications.
- Consider creating an Affordable Housing Overlay or other mechanisms to incentivize affordable housing development.
- Encourage use of the Density Bonus provisions through technical assistance and information dissemination.
- Alert housing developers with known interest in developing within the City when opportunities are available (e.g. sites, partnerships, City-owned land, availability of funding).
- Continue to use CDBG funds for infrastructure improvements in low- and moderate-income neighborhoods and to support construction of new affordable units.
- Work with Loma Linda University to identify sites both on campus and off campus that can be developed with affordable housing for students and staff.
- Adopt a policy to provide priority water and sewer service to new housing developments for lower-income households.

Timeframe: Database of sites and process to alert developers by 2024
Meet with developers in pre-application conferences and on a case-by-case basis
Process for expediting affordable housing applications by 2025
Affordable housing overlay by 2025
Density bonus information and use of CDBG funds annually throughout planning period

Responsible Agency: Infrastructure priority policy by end of 2022
Community Development Department
Funding Sources: General Fund

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Program 2.4: Housing Choice Voucher Program

The Housing Choice Voucher (formerly known as Section 8) program is a federal program administered by the County of San Bernardino Housing Authority. The program provides rent subsidies to very low-income (up to 50 percent of AMI) and special needs households that spend more than 30 percent of their income on rent. The subsidy represents the difference between the excess of 30 percent of the monthly income and the actual rent. Rental assistance is issued to recipients as vouchers, which permits tenants to locate their own housing and rent units beyond the federally determined fair market rent in the area, provided the tenants pay the extra rent increment. In 2020, 315 households used vouchers in Loma Linda. In San Bernardino County as a whole, over 47,000 households were on the wait list.

Federal fair housing law prohibits landlords and property owners from refusing use of the vouchers as a form of rent payment. Thus, education for all involved parties will help lower-income potential tenants find housing of their choice.

Actions:

- Continue to work closely with the County of San Bernardino Housing Authority to administer the Housing Choice Vouchers Program.
- Assist the Housing Authority in marketing the program to home seekers, landlords, and property owners.
- Support the efforts of the Housing Authority to educate landlords and property owners regarding federal requirements for use of vouchers as acceptable forms of rent payment.

Timeframe: Implementation throughout the planning period
Responsible Agencies: Community Development Department, County of San Bernardino Housing Authority
Funding Source: HUD Housing Choice Vouchers

Program 2.5: Transitional/Supportive Housing and Support Services

State law requires that transitional and supportive housing be considered no different than any other form of housing and be subject to the regulations applicable to housing in the zone in which they locate. While this is the City’s practice, the Development Code does not explicitly define transitional and supportive housing nor identify these housing types in land use tables. Also, AB 101 (statutes of 2019) requires that low-barrier navigation centers, which are sometimes coupled with supportive housing, be permitted as a by-right use in any nonresidential zone that allows housing. The Development Code will require an amendment to address this provision, which expires January 1, 2027.

Actions:

- Amend the Development code to: 1) define transitional housing, supportive housing, and low-barrier navigation center; 2) establish transitional and supportive housing regulations that

reflect State law; and 3) establish low-barrier navigations centers as a by-right use in any nonresidential zone that permits residential uses.

- Per AB 2162 (statutes of 2018), amend the Development Code to restrict imposition of minimum parking requirements for any new supportive housing development located within one-half mile of a public transit stop.
- Per the State Lanterman Act, amend the Development Code to facilitate parking reductions for housing for persons living with disabilities.

Timeframe: Implementation throughout the planning period
Responsible Agencies: Community Development Department, County of San Bernardino Housing Authority
Funding Source: HUD Housing Choice Vouchers

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Removal of Governmental Constraints

Goal 3: Streamlined application review processes and development regulations that support housing production and affordability

Policy 3.1 Periodically review City regulations, ordinances, permitting processes, and residential fees to ensure they do not constrain housing development and are consistent with State law.

Policy 3.2 Implement the ministerial review process for multi-family residential development and mixed-use developments that include at least a two-thirds residential component, as set forth in Chapter 17.115 of the Zoning Code.

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Program 3.1: Targeted Code Updates

Undertake targeted updates to Title 16 (Subdivisions) and Title 17 (Zoning) to achieve to support the development of all housing and affordable and special needs housing in particular.

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Actions:

Amend the Zoning Code to:

- Reference current State Density Bonus law.
- Explicitly address emergency shelters. The City will conditionally permit homeless shelters in the Commercial Manufacturing zone. A conditional use permit will not be required (will be permitted by right) if the number of emergency shelter beds in the City falls short of the number of beds required to meet the City’s unsheltered homeless need, as identified by the most recent publicly available homeless census and in consultation with local homeless service providers. Determination will occur on the date a shelter plan is submitted. Coordinate with agencies serving the homeless regarding the emergency shelter ordinance.
- Define transitional/supportive housing. Transitional and supportive housing will be permitted by right where housing is permitted and subject to the same development standards as other housing development.
- Include regulations to address low-barrier navigation centers per AB 101.

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- Facilitate the development of student and employee housing within lands designated Institutional and Health Care.
- Evaluate, and modify if necessary, development standards in the R-2 and R-3 zone to facilitate higher density and affordable housing.
- Clarify that group homes with seven or more clients are considered a commercial use of property and thus subject to conditional use permit approval. Include standard conditions of approval in the zoning code to create certainty in the review and approval process.
- Clarify regulations regarding the applicability of Precise Plan of Design for projects that comply with the objective design standards and those that opt out.
- Remove or modify the definition of “Family,” to remove reference to persons related by blood or marriage.
- Consider amending the Subdivision Code to permit small-lot subdivisions.

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To address the requirements of SB 35 regarding project streamlining, the City will create a handout for developers indicating how the provisions are implemented in Loma Linda.

Also, the either as part of the Zoning Code or as an administrative process, the City will establish a specific process for reasonable accommodation that is different than the Minor Variance process.

Timeframe: By 2025
Responsible Agency: Community Development Department
Funding Sources: General Fund

Conserve, Preserve, and Improve the Housing Stock

Goal 4: High-quality of housing and residential neighborhoods citywide

- Policy 4.1 Encourage the maintenance, enhancement, and rehabilitation of the existing housing stock.
- Policy 4.2 Continue to utilize the City’s code enforcement program to improve overall housing conditions in Loma Linda.
- Policy 4.3 Promote increased awareness among property owners and residents of the importance of property maintenance.

Program 4.1: Code Enforcement

Code enforcement is an important tool for maintaining the quality of residential neighborhoods. Loma Linda building officials provide inspection services on a complaint basis. Examples of code violations include families living in illegal units, such as garages and recreational vehicles, construction of illegal buildings, households living in unsafe buildings, and water conservation violations.

Action:

- Provide ongoing inspection services to review code violations on a survey and complaint basis.
- Work with neighborhood organizations and other groups to create programs that recognize homeowners for exemplary property maintenance.

- Create an ADU amnesty program that allows owners of illegally converted garages, detached accessory structures, and attached accessory living quarters to convert those units to units that comply with the Building Code and ADU ordinance.
- Consider establishing a rental inspection program that provides for the City to check on rental units on a regular basis (for example, every three years) to ensure they are maintained in a safe and healthy condition. Such a project could be funded by fees charged to landlords/rental property owners.

Timeframe: Code Enforcement implementation throughout the planning period; ADU amnesty program and rental inspection program investigation by 2026

Responsible Agency: Community Development and the Public Safety Department

Funding Sources: General Fund

Program 4.2: Monitor and Preserve Affordable Housing and At-Risk Units

One affordable housing project is at risk of converting to market-rate units in 2029 and 2030. The City will be prepared to provide technical assistance to owners, tenants, and non-profit housing corporation buyers of existing subsidized low-income housing complexes to extend subsidy contracts and/or find government financing (e.g., HOME funds) for acquisition of the affordable rental units. If conversion of a subsidized complex or other affordable housing to market rate becomes likely, the City will work with tenants of at-risk units and provide them with education regarding tenant rights, first right of refusal, and conversion procedures. The City will also provide tenants information regarding Housing Choice Voucher (Section 8) rent subsidies through the County of San Bernardino other affordable housing opportunities.

Timeframe: Begin conversations with property owner in 2023 to understand intentions; help facilitate discussions with potential buyers interested in preserving affordability covenants when intentions are known; provide information to tenants when decision to convert, if it happens, is made.

Responsible Agency: Community Development Department

Funding Sources: General Fund; grants

Affirmatively Further Fair Housing

Goal 5: Equal housing opportunities for all residents

- Policy 5.1 Assist in the enforcement of fair housing laws that prohibit discrimination in the building, financing, selling, or renting of housing on the basis of race, ethnicity, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.
- Policy 5.2 Distribute affordable housing throughout all Loma Linda neighborhoods.
- Policy 5.3 Avoid concentrating low-income housing in areas with high pollution loads and low service levels.
- Policy 5.4 Facilitate increased participation by traditionally underrepresented residents in civic conversations and decisions-making.

Policy 5.5 Support continuing education for landlords regarding their fair housing legal responsibilities and tenants regarding their fair housing rights.

Program 5.1: Affirmatively Furthering Fair Housing (AFFH)

The City of Loma Linda takes affirmative steps to promote fair housing practices by contracting the services of a non-profit organization to provide fair housing services in the City. The City works with the Inland Fair Housing and Mediation Board to provide fair housing services for residents and housing professionals.

In the AFFH analysis in Appendix E, Figure E-1 identifies the socioeconomic conditions in Loma Linda relative to the location of planned housing sites to achieve the RHNA. The map indicates which areas of the City are high, moderate, and low resource areas (as defined through the State's Tax Credit Allocation Committee, or TCAC, criteria), as well as areas of high segregation and poverty. Loma Linda does not have any high resource areas per the TCAC criteria. The only low resource area occurs in the northcentral portion of the City, just east of Loma Linda University and Loma Linda Medical Center. These neighborhoods have the highest concentration of renters and overcrowded households, likely associated with a student population living near the university. This area has 19 housing sites. The analysis indicates that about three-fifths of all sites lie within moderate resource areas. In the northwest corner of the City, which has higher instances of segregation and poverty, the sites inventory includes only two vacant sites. Thus, overall, the sites inventory does a good job of distributing units for all income levels across the City.

The predominant issues of concern are:

- The concentration of lower-income households east of the university, with many vacant and underutilized properties under the control of the university
- Diminishing availability of affordable housing to meet the needs of university students and non-professional staff at the university and medical center
- The City's lack of local funding and personnel resources to address fair housing complaints

A key contributing factor may be, ironically, the prestige of these local institutions and the people attracted to the jobs and programs they offer. Other factors include the high demand for affordable housing throughout the Inland Empire, supply chain disruptions due to COVID-19 that have driven up construction costs, and public opposition to higher-density housing in a community that has long been lower-density, suburban in nature. On the plus side, projects are moving forward within the Groves Specific Plan (approved in 2018), and the specific plan requires provision of affordable housing within each of the planning areas.

To address these factors and work toward improving housing access for all, the City will take the following actions.

Actions:

- Continue to refer cases and questions to the Inland Fair Housing and Mediation Board for enforcement of prohibitions on discrimination in lending practices, in the sale or rental of housing, and violation of other fair housing laws. As funding is available, the City will maintain records of complaints for purposes of better understanding local issues.

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2021-2029 Housing Element

- Continue to provide information to help increase awareness of fair housing protections through fair housing workshops.
- Inform landlords of their legal responsibilities regarding fair housing.
- Advertise the availability of fair housing services through flyers at public counters and City mailers. Post available fair housing services on the City’s website and other community locations.
- At least once annually, make a presentation to the City Council about fair housing issues and progress.
- Continue to participate in and implement the Analysis of Impediments to Fair Housing Choice for San Bernardino County.
- Promote public awareness of federal, State, and local regulations regarding equal access to housing. Provide information to the public on various State and federal housing programs and fair housing law. Maintain referral information on the City’s website and at a variety of other locations such as community and senior centers, local social service offices, in City utility bills, and at other public locations including City Hall and the library.
- Implement an accessibility policy that establishes standards and procedures for providing equal access to City services and programs to all residents, including persons with limited proficiency in English, and persons with disabilities.
- Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application’s compliance with all entitlement requirements.
- As noted in Program 1.1, work with Loma Linda University and the Medical Center to develop a specific plan for Special Planning Area (SPA) C that includes a variety of housing types, with housing permitted as a by-right use.
- Enforce the provisions of the Groves Specific Plan that require the provision of affordable housing.
- Pursue funding targeted for the northwest and northcentral neighborhoods surrounding the university and medical center to achieve investments in infrastructure, parks, transit access, and housing rehabilitation.

Timeframe: Implementation throughout the planning period,
Website and public counter posting of fair housing resources to occur within one year of Housing Element adoption. Fair housing workshops to occur at least once per year.
Specific plan for SPA C by 2026

Responsible Agency: Community Development Department

Funding Sources: General Fund

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Promote Sustainability Practices

Goal 6: Sustainable use of natural resources in housing production and operations

- Policy 6.1 Incentivize developers to incorporate sustainable practices into the design of subdivisions.
- Policy 6.2 Promote the use of energy-efficient appliances in new homes.
- Policy 6.3 Promote home retrofits that reduce consumption of water and energy resources.
- Policy 6.4 Establish high sustainability standards for new multi-family housing and mixed-use developments.

Program 6.1: Code Amendments

The California Green Building Code (CALGreen) establishes sustainable design and construction requirements for residential projects. In addition to those requirements, the City will take the following actions to promote sustainability.

Actions:

- Incorporate sustainable design requirements into the objective design standards used to review multi-family and mixed-use development projects.
- Explore creating a menu of design approaches for residential subdivisions that includes such design components as use of bioswales or similar features for stormwater capture, use of permeable surfaces for driveways, dedicated bikeways, protection of habitat, lot orientation for optimal solar access, and ample shade trees.

Timeframe: Objective design standards application: immediately upon adoption
Subdivision design options: by 2026

Responsible Agency: Community Development Department

Funding Sources: General Fund

Quantified Objectives

Table 1 summarizes the City’s quantified objectives for the 2021-2029 planning period by income group.

- The Construction Objective represents the City’s RHNA of 2,051 units.
- ~~The objectives for rehabilitation reflect references the City will make to County programs since no funds for rehabilitation programs are available at the City level. Also, policies are in place to encourage maintenance and rehabilitation of housing in the City in the event local funding sources become available during the planning period.~~
- The Conservation objective refers to maintenance of covenanted affordable units at risk of converting to market-rate housing by 2031.

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Table 1: 2021-2029 Quantified Objectives

Objectives	Income Levels				Total
	Extremely/ Very Low	Low	Moderate	Above Moderate	
Construction Objectives (a)	523	311	352	865	2,051
Rehabilitation Objectives (b)	5	5	10	--	20
Conservation/Preservation Objectives (c)		5	--	--	5

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Appendix A

COMMUNITY PROFILE/HOUSING NEEDS ASSESSMENT

Population and Employment Trends

Housing needs are influenced by population and employment trends. This section summarizes changes in the population size, age, and racial/ethnic composition of Loma Linda residents over the past decade.

Current Population and Population Growth

Between 2010 and 2020, as reported by the U.S. Census, the population of Loma Linda grew approximately 5.5 percent, from 23,261 to 24,535 residents. This 5.5 percent increase is less than the County of San Bernardino's 19 percent increase. The Southern California Association of Governments (SCAG) growth forecasts predict a steady increase in population through 2045. From 2020 to 2045, SCAG estimates that the City's population will grow by 23 percent, while countywide population is expected to increase by 14.8 percent.

Table A-1: Population Growth and Projected Growth

	2010	2020	2045	% Change	
				2010-2020	2020-2045
Loma Linda	23,261	24,535	30,100	5.5%	23%
San Bernardino County	1,709,434	2,035,210	2,815,000	19%	14.8%

Source: CA DOF E-5 Population and Housing Estimates, SCAG Growth Forecasts

In addition to population projections, several other demographic characteristics and trends define housing needs. Among these characteristics are age composition, racial and ethnic composition, and employment.

Age

Table A-2: Age

Demographic Profile	2010		2019	
	Number	Percentage	Number	Percentage
0-14	5,344	23%	5,015	21%
15-24	8,815	39%	9,388	39%

Table A-2: Age

Demographic Profile	2010		2019	
	Number	Percentage	Number	Percentage
25-44	5,138	23%	5,238	22%
45-64	3,517	15%	4,543	19%
65+	5,344	23%	5,015	21%
Median Age	35.9		36.3	

Sources: American Community Survey 2006-2010 & 2015-2019 5-year estimates

Population age distribution serves as an important indicator of housing needs because housing needs and preferences change as individuals or households grow older. Young families tend to focus more on cost and the ability to become first-time homebuyers. Table 2 shows the age distribution of Loma Linda residents. In 2019, the 15 to 24 age group constituted the largest age group at approximately 39 percent, followed by the 25 to 44 age group at 22 percent. Compared with 2010, the 15 to 24 age group remained the largest age group. Table 2 indicates that the age distribution has remained relatively the same over the last decade and interestingly, compared to regional and statewide trends, the elderly population has declined as a percentage of the overall population.

The median age in Loma Linda is 36.3 years. Compared with the County (33.8 years) and the state (37 years), the City’s population is similar to the state median, but slightly higher than the County median. Although the 15-24 age group constituted the largest age group in both years, the 45-64 age group saw the largest increase, which could imply a growing senior population in the coming years. This could result in demands for smaller units that are more accessible to aging households.

Race and Ethnicity

Table A-3: Race and Ethnicity

Demographic Profile	2010		2019	
	Number	Percentage	Number	Percentage
White (non-Hispanic)	9,384	41%	7,822	32%
Hispanic	6,204	27%	6,821	28%
Black	1,078	5%	2,345	10%
Asian/Pacific Islander	5,823	25%	6,275	26%
Other	348	2%	921	4%

Sources: American Community Survey 2006-2010 & 2015-2019 5-year estimate

Table 3 shows the racial/ethnic distribution of population in Loma Linda. White (non-Hispanic) and Hispanic residents make up most of the City’s population. Compared with the County of San Bernardino the City has about half the proportion of Hispanics, and three times the proportion of Asians/Pacific Islanders. Since 2010, both the proportion and number of White (non-Hispanic) people have decreased,

while the proportion and number of Black people have doubled. This is indicative of the City becoming more diverse.

Employment

Table A-4: Employment by Industry

Demographic Profile	2010		2019	
	Number	Percentage	Number	Percentage
Educational services, and health care and social assistance	4,635	44%	4,809	47%
Retail trade	1,222	12%	1,008	10%
Professional, scientific, and management, and administrative and waste management services	568	5%	725	7%
Arts, entertainment, and recreation, and accommodation and food services	790	7%	686	7%
Transportation and warehousing, and utilities	689	7%	672	7%
Other services, except public administration	246	2%	434	4%
Manufacturing	568	5%	393	4%
Finance and insurance, and real estate and rental and leasing	535	5%	383	4%
Construction	414	4%	379	4%
Public administration	266	3%	379	4%
Wholesale trade	343	3%	198	2%
Agriculture, forestry, fishing and hunting, and mining	20	0%	66	1%
Information	255	2%	31	0%

Sources: American Community Survey 2006-2010 & 2015-2019 5-year estimates

Residents in Loma Linda are primarily employed in educational services, and health care and social assistance (47%), retail trade (10%), and professional, scientific, and management, and administrative and waste management services (7%). The median incomes for these industries are \$50,221, \$25,641, and \$39,297, indicating that about half of the City's working population is employed in a middle wage occupation. The major employer in the City is Loma Linda University Medical Center, which includes both medical and educational institutions. Employment characteristics are important as they have a direct relationship with income. In Loma Linda, the other half of workers outside of the educational services, and health care and social assistance industry are making less than \$50,000, indicating the need for expanding access to higher paying industries.

Household Characteristics

Characteristics for Loma Linda households are summarized in Table 5. The number of households in Loma Linda have increase by 229 households, or 2.6 percent, since 2010. There are more renter households than owner households in Loma Lina. Owner-occupied households constitute 38.4 percent of all households in 2019, while households that are renter occupied constitute 61.6 percent of all households. Different housing arrangements have different housing needs, and this distribution indicates that addressing issue and needs for renters and owners equally is important.

Table A-5: Household Characteristics by Tenure

Household Characteristic	Owner Households	Renter Households	All Households
Number of Households ¹	3,433 (38.4%)	5,499 (61.6%)	8,932
Median Household Income ¹	\$83,109	\$42,935	\$55,607
Household Income Categories²			
Extremely Low Income (0-30% AMI)	145 (5%)	1,180 (21%)	1,325 (15%)
Very Low Income (30-50% AMI)	215 (7%)	630 (11%)	845 (10%)
Low Income (50-80% AMI)	475 (15%)	835 (15%)	1,310 (15%)
Moderate Income (80-100% AMI)	210 (7%)	750 (13%)	960 (11%)
Above Moderate Income (100% + AMI)	2,045 (66%)	2,195 (39%)	4,240 (49%)
Total	3,090 (100%)	5,595 (100%)	8,685 (100%)
Total number of projected Extremely Low-Income Households (RHNA) 3	N/A	N/A	262
Overpayment			
All Households Overpaying for Housing ²	820 (27%)	2,610 (47%)	3,430 (39%)
Lower Income Households Overpaying for Housing ²	450 (54%)	2,015 (76%)	

Source¹: US Census Bureau, American Community Survey 2015-2019 5-year estimates

Source²: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (CHAS) Tables 2013-2017

Source³: Southern California Association of Governments (SCAG) 2023-2031 Regional Housing Needs Allocation

Income

According to the 2019 American Community Survey, the median household income for Loma Linda was \$55,607, which is lower than the County of San Bernardino median household income of \$67,903. Median household income differs by tenure; owner households earn almost twice what renter households make.

Census data estimates that 16.8 percent of residents live in poverty, as defined by federal guidelines. This proportion is slightly higher than the County of San Bernardino where 16 percent of residents live in poverty. The poverty threshold is set by the U.S. government to indicate the least amount of income a person or family needs to meet their basic needs. Poverty thresholds are established based on family size and are updated annually in relation to the Consumer Price Index, but do not vary geographically. In Loma

Linda, certain demographic groups are much more likely to be living in poverty. The proportion of persons or households living in poverty is much higher for Hispanics and those with less than a high school diploma.

For housing planning and funding purposes, the State Department of Housing and Community Development (HCD) uses five income categories to evaluate housing need based on the Area Median Income (AMI) for the County:

- Extremely Low-Income Households earn 0-30 percent of AMI
- Very Low-Income Households earn 30-50 percent of AMI
- Low-Income Households earn 50-80 percent of AMI
- Moderate-Income Households earn 80- 120 percent of AMI (federal data uses 100%)
- Above Moderate-Income Households earn over 120 percent of AMI (federal data uses 100%+)

Comprehensive Housing Affordability Strategy (CHAS) data provides special Census tabulations (developed for HUD) and calculates household income adjusted for family size and tenure. As shown in Table A-5, in Loma Linda, above moderate households comprise the largest share of all households (49 percent), and extremely low-income households comprise the second largest category (15 percent). According to the 2017 CHAS, 15 percent of the City's total households were classified as extremely low income (0-30 percent of AMI), 10 percent were classified as very low income (31-50 percent of AMI), and 15 percent were classified as low income (51-80 percent AMI). Sixty percent of the City's households had incomes above 80 percent of the median household income. Income differs by tenure. Table 5 shows that more renter households are in the lower income categories (0-80 percent AMI) compared with owner households.

Housing Overpayment

State and federal standards specify that households spending more than 30 percent of gross annual income on housing experience a housing cost burden. Housing cost burdens occur when housing costs increase faster than household income. When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care. In the event of unexpected circumstances such as loss of employment or health problems, lower-income households with a housing cost burden are more likely to become homeless or double up with other households. In Loma Linda 39 percent of households are overpaying for housing. Lower-income households have a much higher rate of overpayment at 74 percent. Overpayment also varies by tenure. For owner-occupied households, 27 percent of all households are overpaying compared with 54 percent of lower-income, owner households. For renter households, 47 percent of all households are overpaying compared with 76 percent of lower-income, renter households.

Housing Stock Characteristics

This section describes housing characteristics and trends to provide a basis for assessing the match between the demand and supply of available housing in Loma Linda. These include housing growth, housing characteristics, age and condition of housing, housing prices and rents, and homeownership rates.

Housing Stock

In 2021, the Department of Finance estimates there are 10,018 housing units in the city. Compared to 2010 the City’s housing stock has increased by 369 units (4 percent). Most of the City’s housing stock is made up of single-family homes (47 percent) with only 39 percent of the being multi-family. Census data indicates that 3.2 percent of owner units and 5.5 percent of rental units are vacant.

Loma Linda was developed as a community of single-family dwelling units and has primarily remained as such. Single-family detached units represent 47 percent of the City’s housing stock, with single-family attached units representing seven percent, multi-family units representing 39 percent, and mobile homes and other housing filling out the remaining seven percent.

Table A-6: Household Characteristics by Tenure

Housing Characteristic	Owner Households	Renter Households	All Households
Total Housing units (occupied)	3,433 (38.4%)	5,499 (61.6%)	8,932 (100%)
Single Family Detached	N/A	N/A	4,710 (47%)
Single Family Attached			722 (7%)
Multi-Family Units			3,929 (39%)
Mobile home, other units			657 (7%)
Total units			10,018 (100%)
Average or median Household Size			2.59
Vacancy Rate			3.2%
Overcrowded Units	128	207	335
Units Needing Replacement/Rehabilitation	N/A	N/A	0
Housing Cost	\$614,000	\$1,338	N/A

Note: Does not sum to 100% due to vacant units

Sources: US Census Bureau, American Community Survey 2015-2019 5-year estimates, California Department of Finance E-5 Population and Housing Estimates, 2020. CoreLogic September 2020 for Loma Linda, CA accessed on June 30, 2021.

Overcrowding

In response to a mismatch between household income and housing costs in a community, some households may not be able to buy or rent housing that provides a reasonable level of privacy and space. According to both California and federal standards, a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms, and halls). In Loma Linda, 335 units (4.8 percent) of housing units are overcrowded. Proportionally, overcrowding is the same for both rental and owner units.

Housing Condition

The condition of housing stock can be an indicator of potential rehabilitation needs. Based upon observations and experiences of City Code Enforcement and Planning staff, the City estimates that in 2021, no housing units are in severe need of replacement or substantial rehabilitation due to housing conditions. Residents’ calls to Code Enforcement largely involve complaints regarding cosmetic, not structural, concerns that are most appropriately addressed by having tenants contact their landlords.

Housing Cost

The cost of housing in a community is directly correlated to the number of housing problems and affordability issues. High housing costs can price low-income families out of the market, cause extreme cost burdens, or force households into overcrowded or substandard conditions. The Loma Linda median home price in 2020, based information provided by CoreLogic, was \$614,000. This was 14 percent higher than the median price in 2019. The median home price in San Bernardino County in 2020 was \$396,000, lower than Loma Linda’s median home price.

According to the 2019 American Community Survey, 61.6 percent of Loma Linda’s households live in rental housing. Census data shows that the average rent in Loma Linda is \$1,338 per month with most (40.6 percent) paying between \$1,000 and \$1,499 in rent. The real estate website Zumper.com reports a median rent of \$1,155 for one-bedroom units, \$1,512 for two-bedroom units, and \$1,898 for three-bedroom units in Loma Linda as of January 2021. Table A-7 shows that the HUD-determined fair market rents for San Bernardino fall within the range of the rents within Loma Linda. Therefore, the rental rates in Loma Linda generally exceed the HUD determined fair market rents, indicating that certain parts of San Bernardino County are less expensive than local rents.

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Table A-7: Fair Market Rents in San Bernardino County

Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2020 FMR	\$875	\$1,030	\$1,289	\$1,789	\$2,216

Sources: FY2020 Fair Market Rents. U.S. Department of Housing and Urban Development (HUD)

Special Housing Needs

Housing-element law requires local governments to include an analysis of housing needs for residents in specific special needs groups and to address resources available to address these needs. Loma Linda is a unique community in that it is home to two major regional medical facilities: Loma Linda Medical Center and the Veterans’ Hospital. Thus, the local population may reflect the circumstance that persons who use the services at these facilities might live in the community. For example, the Veterans’ Village housing development adjacent to the Veterans’ Hospital provides permanent housing for disabled veterans and their families. The high percentage of elderly residents may be a result of older persons wishing to live near the medical and other health care services available through the Loma Linda Medical Center. Within The Groves Specific Plan, two large planning areas have been designated for seniors-only housing development.

Table A-8: Special Needs Groups

Special Needs Category	Count	Percent
Persons with Disabilities ¹	3,301 persons	13.8% of residents
Persons with Developmental Disabilities ²	413 persons	1.7% of residents
Elderly (65+ years) ¹	5,015 persons	21% of residents
	2,646 households	25% of households
Large Households (5+ members) ¹	937 households	10.5% of households
Farmworkers ¹	66 persons	1% of labor force
Female Headed Households ¹	1,119 households	15.2% of households
People Experiencing Homelessness ³	52 persons	N/A
Students ¹	3,212	13.3% of residents

Notes:

1. US Census Bureau, American Community Survey 2015-2019 5-year estimates
2. California Department of Developmental Services, 2020; DDS consumer count by CA ZIP Codes 92354
3. San Bernardino County Homeless Count and Subpopulation Survey, 2020

Persons with Disabilities, Including Persons with Developmental Disabilities

Disabled residents face housing access and safety challenges. Disabled people, in most cases, are of limited incomes and often receive Social Security income only. As such, most of their monthly income is often devoted to housing costs. In addition, disabled persons may face difficulty finding accessible housing (housing that is made accessible to people with disabilities through the positioning of appliances and fixtures, the heights of installations and cabinets, layout of unit to facilitate wheelchair movement, etc.) because of the limited number of such units.

There are 3,301 residents with a disability in Loma Linda, representing 13.8 percent of City residents. The majority of residents with a disability are 75 years and over (53.7 percent), followed by those 65 to 74 years old (34 percent). The most prevalent disability types among disabled Loma Linda residents are ambulatory and independent living disabilities, which combined make up almost half of disabilities tallied.

The State Department of Developmental Services (DDS) currently provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers. The Inland Regional Center serves residents in Loma Linda. The center is a private, non-profit community agency that contracts with local service providers to offer a wide range of services to individuals with developmental disabilities and their families. In Loma Linda, 413 persons are reported as consumers of the services provided at the local Regional Center. This includes 210 persons 18 years and older and 23 persons under 18 years old receiving services from DDS. Most individuals with developmental disabilities live in home settings, often with service and care from a family member and/or health provider.

Issues related to affordability and design significantly limit the supply of housing available to households of persons with disabilities. The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Location of housing is also an important factor for many persons with disabilities,

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as they often rely upon public transportation to travel to necessary services and shops. In Loma Linda, the proximity of the Veterans' Hospital and Loma Linda Medical Center are convenient for disabled persons who require continued medical care.

Barrier-free housing, accessibility modifications, proximity to services and transit, and group living opportunities represent the key needs for disabled persons. The City works with applicants who need special accommodations ("reasonable accommodation") in their homes to ensure that application of building code requirements does not create a constraint. While the current (2021) process involves a formal application and City review process, the City intends to adopt a less formal process.

The City complies with the Federal Americans with Disabilities Act (ADA) and the most recent California Building Code regulations.

Elderly (65+ years)

Many senior-headed households have special needs due to their relatively low incomes, disabilities or limitations, and dependency needs. Specifically, many people aged 65 years and older live alone and may have difficulty maintaining their homes, are usually retired and living on a limited income, and are more likely to have high health care costs and rely on public transportation, especially those with disabilities. The limited income of many elderly persons often makes it difficult for them to find affordable housing.

In Loma Linda, 21 percent of residents are over the age of 65. There are 2,646 households headed by elderly residents, representing 25 percent of total households in Loma Linda. The needs of elderly households include rental affordability, disability, and housing maintenance assistance. As these homeowners age, many may be unable to maintain their homes and may benefit from the installation of assistance devices to enhance accessibility. Addressing the diverse housing needs of Loma Linda's senior population will require strategies that foster independent living (such as home accessibility improvements, second units, rehabilitation assistance), as well as strategies that encourage the provision of variety of supportive living environments for seniors of all income levels. As indicated above, The Groves Specific Plan includes two large planning areas specifically for senior housing. Also, a large property adjacent to City Hall has been designated for senior housing development at a density of 25 units per acre.

The City offers services to its senior residents through the Senior Center, such as meals, tax preparation assistance, classes and activities, blood pressure checks, and during the COVID-19 pandemic, COVID testing.

Large Households (5+ members)

Large households, defined by HCD as households containing five or more persons, have special housing needs due to the limited availability of adequately sized, affordable housing units. Larger units can be very expensive; as such, large households are often forced to reside in smaller, less expensive units or double up with other families or extended family to save on housing costs, both of which may result in unit overcrowding. There are 937 large households in Loma Linda, representing 10.5 percent of all households. Large households are equally renters and owners. There are 469 owner-occupied large households and 468 renter-occupied households.

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According to 2019 American Community Survey data, an estimated 1,618 housing units in Loma Linda have four or more bedrooms; this represents 18 percent of all units. Thus, the percentage of available units exceeds the percentage of all families that are large families (10.5 percent).

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Farmworkers

Due to the high cost of housing and low wages, a significant number of migrant farm workers have difficulty finding affordable, safe, and sanitary housing. The 2019 American Community Survey states that 66 persons work in agriculture, forestry, fishing, and hunting. This is one percent of the total workforce in Loma Linda and could include persons involved in the nursery and landscape industries. The State of California Department of Conservation Farmland Mapping shows there is Prime Farmland in the area; Loma Linda was once part of a large citrus industry which has since been replaced by urbanization. Due to the absence of continued citrus production locally and in the region, the need for farmworker housing no longer exists. Any needs for temporary farmworker housing, if any, can be met by generally available affordable housing programs.

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Female-headed Households

Single-parent households require special consideration and assistance because of the greater need for day care, health care, and other services. In particular, female-headed households with children tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services. The relatively low incomes earned by female-headed households, combined with the increased need for supportive services, severely limit the housing options available to them.

There are 1,119 female-headed family households in Loma Linda, representing 15.2 percent of households. Household type and income are closely linked. In Loma Linda in 2019, 15.2 percent of female headed households were below the poverty level, compared to nine percent of married of couple families. Lower-income single-parent households can benefit from County programs that provide direct rental assistance and in general, programs that facilitate the development of affordable housing.

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People Experiencing Homelessness

Population estimates for people experiencing homelessness is very difficult to quantify. Census information is often unreliable due to the difficulty of efficiently counting a population without permanent residences. Given this impediment, local estimates of the homeless and anecdotal information are often where population numbers of the homeless come from. In 2020, there was a total of 27 unsheltered individuals in Loma Linda, which is 1.1 percent of the total number of unsheltered individuals in San Bernardino County. The number of unsheltered individuals in Loma Linda increased from eight in 2019.

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No homeless shelters or other emergency housing exists in Loma Linda. However, healthcare services for homeless individuals are available at the Veterans' Hospital (for homeless veterans), and many shelters and food distribution facilities operate in the adjacent cities of San Bernardino and Redlands.

Students

The need for student housing is a significant factor affecting housing demand in Loma Linda. Although students may produce only a temporary housing need, the impact upon housing demand is critical in areas that surround universities and colleges. Typically, students have limited incomes and are, therefore, competing for the same limited amount of affordable housing in the community, especially within easy commuting distance from campus. They often seek shared housing situations to decrease expenses and can be assisted through roommate referral services offered on and off campus. College graduates provide a specialized pool of skilled labor that is vital to the economy; however, the lack of affordable housing often leads to their departure from the region.

The 2019 American Community Survey indicates that 3,212 Loma Linda residents were enrolled in undergraduate or graduate studies. The main higher educational institution is Loma Linda University (LLU). LLU is a Seventh-Day Adventist coeducational health sciences university consisting of eight schools and the Faculty of Graduate Studies. More than 100 certificate and degree programs are offered by the schools of allied health professions, dentistry, medicine, nursing, pharmacy, public health, religion, and science and technology. Curricula offered range from certificates of completion and associate in science degrees to Doctor of Philosophy and professional doctoral degrees. LLU also offers distance education.

In Fall 2020, LLU enrolled 4,514 students and had 1,661 full-time faculty. Since 2011, student enrollment has stayed the same. Students under the age of 21 years who are in undergraduate programs, such as nursing, dental hygiene, or allied health professional curricula, are required to live on campus, unless they are married or living with their parents. LLU offers on-campus residential housing for students in two complexes. Kate Lindsay Hall for Undergraduate and Graduate Women houses 240 students in double, single, or modified double occupancy rooms. The A.G. Daniells Residence for Men and Women houses 200 students in 87 0- to 4-bedroom units. LLU also provides off-campus housing for students through 12 LLU foundation homes and apartment complexes located within just a few blocks of campus.

Energy Conservation Opportunities

Energy-related housing costs can directly impact the affordability of housing. While state building code standards contain mandatory energy efficiency requirements for new development, the City and utility providers are also important resources to encourage and facilitate energy conservation and to help residents minimize energy-related expenses. Policies addressing climate change and energy conservation are integrated into the Loma Linda General Plan. The primary avenues to address climate change in Loma Linda are through providing a balance between local employment and housing to reduce daily commutes, providing for compact, walkable communities and infill development in areas served by existing infrastructure, and investing in green buildings to reduce energy consumption.

Presently, Southern California Edison offers various energy conservation programs. The Energy Savings Assistance Program helps income-qualified customers with free appliances and installation of energy-efficient refrigerators, air conditioners and more, as well as home efficiency solutions like weatherization. The Energy Upgrade California program offers financial incentives for installing approved energy upgrades. The Residential Multifamily Energy Efficiency Rebate Program offers property owners and managers incentives on a broad list of energy efficiency improvements in lighting, HVAC, insulation, and window categories. These improvements are to be used to retrofit existing multifamily properties of two

or more units. Additionally, the Southern California Gas Company offers various rebate programs for energy-efficient appliances and makes available energy-efficient kits to residents at no cost. The Gas Company also offers no-cost weatherization and furnace repair or replacement services for qualified limited-income customers.

At-Risk Housing Analysis

State housing law requires an inventory and analysis of government-assisted dwelling units eligible for conversion from lower income housing to market rate housing during the next 10 years. Reasons for this conversion may include expiration of subsidies, mortgage pre-payments or pay-offs, and concurrent expiration of affordability restrictions.

Based on City records and information from the California Housing Partnership Corporation, during the next 10 years (2021-2031), six single-family homes are at risk of losing affordability. Known as the Gardner Development, these six ownership units, which were subsidized by the former redevelopment agency using housing set-aside funds, have affordability covenants expiring in 2026 through 2031. At the time the covenants expire, each homeowner is free to sell their unit at market rate. If the City or other agency wished to buy the units at that time, they would compete with other potential market-rate buyers. In the properties are offered for sale prior to expiration of the covenant, the homes would have to be sold to another income-qualified buyer, and a new 30-year covenant would be established. If the City's Housing Authority were to purchase a property during the same time period, the Authority would be required to resell to a qualified buyer with a 45-year covenant.

At this time, the Housing Authority does not have the financial or managerial resources to purchase any of the six homes to retain their affordability. Based on advertised home prices in the immediate neighborhoods, the covenanted units could be expected to sell for approximately \$375,000 in 2021; prices would be expected to be different in subsequent years. The Housing Authority would need to negotiate with each individual homeowner. The City has no plans to pursue purchase.

Pursuant to Government Code Section 65863.11, the State maintains a list of "Entities Interested in Participating in California's First Right of Refusal Program" at <https://www.hcd.ca.gov/policy-research/docs/HPD-00-01>. This list includes various entities working in San Bernardino County and several entities interested in properties located in any county. The City will maintain contact with local organizations and housing providers who may have an interest in acquiring the at-risk units and will assist other organizations in applying for funding to acquire the at-risk units.

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Coastal Zone

The City of Loma Linda is not in a coastal zone and therefore is not subject to the requirements of Government Code 65588 (c) and (d).

Projected Housing Need (RHNA)

Housing-element law requires a quantification of each jurisdiction's share of the regional housing need as established in the RHNA-Plan prepared by the jurisdiction's council of governments. The California Department of Housing and Community Development (HCD), in conjunction with the SCAG, determine a projected housing need for the region covered by SCAG, including the counties of Riverside, San

Bernardino, Los Angeles, Orange, Ventura and Imperial. This share, known as the Regional Housing Needs Allocation (RHNA), is 1,341,827 new housing units for the 2023-2031 planning period throughout the SCAG region. SCAG has, in turn, allocated this share among its constituent jurisdictions, distributing to each its own RHNA divided along income levels. The City of Loma Linda has a RHNA of 2,051 housing units to accommodate in the housing element period. The income distribution is as shown in Table A-9.

Table A-9: Special Needs Groups: Regional Housing Needs Allocation 2023-2031

Income Group	% of County AMI	Number of Units Allocated	Percent of Total Allocation
Very Low ¹	0-50%	523	25%
Low	>50-80%	311	15%
Moderate	>80-120%	352	17%
Above Moderate	120%+	865	42%
Total	---	2,051	100%

Note: Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. There are 523 extremely low- and very low-income households, with extremely low-income households comprising 50% of the total. Therefore, the City's very low-income RHNA of 523 units can be split into 262 extremely low-income and 261 very low-income units.

Appendix B

CONSTRAINTS ON HOUSING PRODUCTION

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Housing Element law requires the City to examine nongovernmental and governmental constraints on housing production. Developers face constraints over which the City has no control: the volatility of the housing market, developers' access to capital construction, the cost and availability of construction materials, potential homeowners' access to funding, and environmental conditions, among others. Government policies and regulations impact the price and availability of housing and the provision of affordable housing. These constraints include residential development standards, fees, and permitting procedures. Developers also can be required to provide infrastructure and services that add to housing costs. This section identifies those constraints and where appropriate, indicates that a program or programs could serve to reduce or eliminate the obstacles.

Nongovernmental Constraints

The availability and cost of housing is strongly influenced by market factors which local government has very limited ability to control. State law requires that the Housing Element contain a general assessment of these constraints, which can serve as the basis for actions that local governments might take to offset their effects. The primary nongovernmental constraints to the development of new housing are land costs, construction costs, and environmental constraints.

Development Costs

Price of Land

Land costs include acquisition and the cost of holding land throughout the development process. These costs can account for as much as half of the final sales prices of new homes in small developments or in areas where land is scarce. Land costs for residentially zoned properties in Loma Linda range from \$243,408 to \$696,000 per acre.¹ Among the variables affecting the cost of land are the size of lots, location and amenities, the availability and proximity of public services, and the financing arrangement between the buyer and seller.

¹ A review of vacant residential land sales on redfin.com on July 30, 2021 indicated very few residentially zoned vacant lots for sale: only two infill parcels and a 4.93-acre parcel in the hillside area. Land costs were estimated from this sample and may not be representative of general land costs in the City.

Cost of Construction

Construction cost is determined primarily by the cost of labor and materials. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. The price paid for material and labor at any one time will reflect short-term considerations of supply and demand. Future costs are difficult to predict given the cyclical fluctuations in demand and supply that in large part are created by fluctuations in the State and national economies. Such policies unilaterally impact construction in a region and therefore do not deter housing construction in any specific community. An indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not consider regional differences, nor do the data include the price of the land upon which the buildings are built. The 2020 national averages for costs per square foot of apartment units and single-family homes are as follows:

- Type I or II, Multi-Family: \$129.23 to \$167.27 per square foot
- Type V (Wood Frame), Multi-Family: \$112.76 to \$147.50 per square foot
- Type V (Wood Frame), One- and Two-Family Dwelling: \$122.46 to \$141.72 per square foot

Of note for the early portion of this planning cycle is the impact the COVID-19 pandemic had on construction costs and supply chain disruptions. Lumber prices spiked, and providers of lumber and other construction materials were hampered by labor force reductions, all factors which affected home construction costs.

Availability of Financing

The availability of capital to finance new residential development is a significant factor that can impact both the cost and supply of housing. Two types of capital are involved in the housing market: 1) capital used by developers for initial site preparation and construction and 2) capital for financing the purchase of units by homeowners and investors. Interest rates substantially impact home construction, purchase, and improvement costs. A fluctuation in rates of just a few percentage points can make a dramatic difference in the annual income needed to qualify for a loan.

In general, financing for new residential development has continued to be available at relatively reasonable rates for all types of real estate development loans: land acquisition, development, and construction. The rates for construction loans available in California can range from 4.75 to 9.75 percent, with higher rates applicable to applicants with lower credit scores and suboptimum business finances. For apartment projects, developers may be able to secure rates as low as 3.77 percent.² However, economic fluctuations due to COVID-19 have caused caution among lenders and may have lasting effects through this Housing Element planning period. And while interest rates are low, lenders are considering applicants much more closely than in the past, leading to credit tightening despite affordable interest rates.

² <https://www.valuepenguin.com/average-commercial-real-estate-loan-rates>. Accessed July 30, 2021.

Government Code 65583(a)(6) Development Analysis

Government Code section 65583(a)(6) requires an analysis of requests to develop housing at densities below those anticipated in site inventory and the length of time between receiving approval for housing development and submittal of an application for building permit. The analysis must also look at local efforts to remove nongovernmental constraints that create a gap in the jurisdiction’s ability to meet RHNA by income category.

Requests for Lower Development Densities

In Loma Linda, requests for development at densities below anticipated densities have not occurred. ~~For example, the Veterans’ Village project was constructed on a site zoned for 13 units per acre and yielded a density of 20 units per acre with a density bonus. Within the Grove Specific Plan, developers are submitting plans that match the maximum permitted densities within each planning area. Development approval of projects with densities lower than what is anticipated in the Housing Element is not expected, although achieving maximum density on particular lots constrained by topography or creeks may not be possible (with such sites zoned for single-family homes in the hillside area).~~ In general, and based on recent development in the City, development applications aim for densities as close as possible to what is allowed and City staff is committed to helping a project developer achieve as close to the maximum stated density as allowed for a given parcel.

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Application Processing and Building Permit Timeframes

Loma Linda prides itself on expeditious process of residential development applications. Generally, the length of time between receiving approval for multi-family housing development and submittal of an application for building permit is typically three to five months at most, depending on project complexity and the level of environmental review required. For example, a multi-family residential project with complex grading and drainage plans or requiring a detailed environmental analysis may take longer than usual to submit for permits. For single-family residences, time periods are significantly shorter.

Issuance of building permits for multi-family housing typically takes no more than two to three months. Longer time is required if developers encounter self-caused delays due to financing, negotiations with design professionals, and complex grading which are outside the control of the City.

Local Efforts to Remove Nongovernmental Constraints

This analysis must examine local efforts to remove nongovernmental constraints that create a gap in the City’s ability to meet the RHNA by income category. The primary nongovernmental constraint is the overall cost of affordable housing development (high land and development costs) in most parts of the State. In general, constructing affordable housing, especially for low- and very low-income households, is not profitable to housing developers. Therefore, deed-restricted affordable units require subsidy beyond available density or financial incentives. This places the construction burden on non-profits and similar grant-funded housing developments and may result in affordable projects that are not always dispersed throughout the region but are concentrated in limited areas with lower development costs. While the City can offer developer incentives such as expedited permit processing or fee deferrals, it cannot afford to fully mitigate the high cost of development for affordable housing developments.

The City of Loma Linda has limited access to direct funding sources in support of affordable housing activities. The following sources are currently used:

- Voucher Rental Assistance Program: The Housing Authority of the County of San Bernardino (HACSB) administers the Housing Choice Voucher Program Voucher Rental Assistance Program (formerly the Section 8 Rental Assistance Program) that extends rental subsidies to very low-income households in Loma Linda. The subsidy represents the difference between the excess of 30 percent of the recipient's monthly income and the federally approved fair market rents. In 2020, the HACSB provided rental assistance to 315 households in Loma Linda.
- Public Housing Units: These units are owned and managed by the Housing Authority of the County of San Bernardino. In 2019, the HACSB owned 42 such units in Loma Linda.
- Department of Housing and Urban Development (HUD) Grants: In the 2020-2021 program year, the City of Loma Linda received \$152,619 of federal funding for the Community Development Block Grant (CDBG) program through the County of San Bernardino Consortium. Funds were directed at ADA Restroom Improvement at City facilities and ongoing ADA Sidewalk Improvements, homeless services through Inland Temporary Homes (dba Inland Housing Solutions), literacy education through the Loma Linda Branch of the San Bernardino County Library, and meals provided to seniors through Family Services Association. For 2021-2022, the City's allocation is \$158,907.

Governmental Constraints

Although local governments have little influence on such market factors as interest rates and availability of funding for development, their policies and regulations can affect both the amount of residential development that occurs and the affordability of housing. Since governmental actions can constrain development and affordability of housing, State law requires the Housing Element to "address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing."

Land Use Controls

The City's primary policies and regulations that apply to residential development and housing affordability include the 2009 General Plan, Title 17 – Zoning (Land Use Development Code), Title 16 – Subdivisions, and The Groves at Loma Linda Specific Plan (adopted 2018). In 2021, the City adopted a "one map" system that consolidated General Plan land use designations and zoning districts. Table B-1 presents the land use designations/zoning districts that allow residential development either by right or by conditional use permit.

The City adopted a density bonus ordinance in 2014. While consistent with Government Code 65915 at the time of adoption, the State Legislature has passed numerous changes to the density bonus requirements. The Housing Plan includes programmatic actions to ensure the City's density bonus ordinance is consistent with the most current State laws.

Table B-1: General Plan and Zoning for Residential Uses

General Plan Land Use Designations/ Zoning Districts	Density
Hillside Conservation/HR-C	0-1 du/10 ac
Rural Estates/HR-RE	0-1 du/ac
Very Low Density Residential/HR-VL	0-2 du/ac
Low Density Hillside Preservation/HR-LD	0-1 du/10 ac
Medium Density Hillside Preservation/HR-MD	0-1 du/5 ac
Low Density Residential/R1	0-4 du/ac
Medium Density Residential/R2	0-9 du/ac
High Density Residential/R3	0-13 du/ac
Very High Density Residential/R4	0-20 du/ac
Senior Citizen Housing	0-25 du/ac
Planned Community	Varies ¹
Institutional-Healthcare/I-HC	Varies

Note 1: Each planning area is intended to provide a variety of uses at varied densities through the adoption of specific plans with development regulations unique to an area's location, access, size and adjacent uses.

Table B-2 summarizes the housing types permitted by zone. Each use is designated by a letter denoting whether the use is allowed or conditionally permitted. Of note is that Title 17 does not specifically call out supportive and transitional housing as permitted residential uses. Per State law, such uses are considered the same as any other similar residential use and allowed as those uses are allowed. However, to clarify this and reflect recent State laws regarding supportive housing, the City will update Title 17 for clarity regarding transitional and supportive housing.

Table B-2: Permitted Land Uses by Zoning District

Land Uses	R1	R2	R3	R4	PC	All HR-	I-HC	PF
Single-Family Dwelling	P	P	C	C		P		
Two-Family Dwelling – Duplex		P	P					
Multi-family Dwelling			P	P			C	
Senior Housing			C	C				
Residences for Institutional Personnel							P	P
Boarding and Lodging Houses			C	C				
Dormitories			C	C				
Accessory/Junior Accessory Dwelling Unit	P	P	P	P		P		
Mobile/Manufactured Home	P	P				P		
Mobile Home Park	C	C	C	C				

Table B-2: Permitted Land Uses by Zoning District

Land Uses	R1	R2	R3	R4	PC	All HR-	I-HC	PF
Emergency Shelter								P
Group Home, ≤ 6 clients	P	P	P	P		P		
Group Home, > 6 clients			C	C				
Residential Care Facility			C	C				
Parolee Homes			C	C				
Planned Residential Development	C	C	C	C	C	C	C	

Table B-3 summarizes key development standards for residential zones of Loma Linda, and Table B-4 summarizes standards applicable to development within the hillside (HR) areas.

Table B-3: Residential Development Standards

Development Standard	R1	R2	R3	R4
Minimum Lot Area	7,200 sf			
Density (units per acre)	0-4 du/ac	0-9 du/ac	0-13 du/ac	0-20 du/ac
Lot Area per Dwelling Unit	7,200 sf	3,600 sf	2,200 sf	
Minimum Lot Width (feet)	65			
Setbacks				
Front	25 ft	25 ft	20 ft	20 ft
Sides (each)	15 ft plus additional 5 ft for > one story			
Rear	15 ft	15 ft	15 ft plus additional 5 ft for > one story	
Height Limit	35 ft			
Maximum Lot Coverage	40%	50%	60%	70%
Minimum Unit Size	1,000 sf	675 sf – 0-1 bedroom 850 sf – 2 bedrooms 1,025 sf – 3 bedrooms Plus 175 sf each additional bedroom		
Minimum Open Space	1,200 sf	1,200 sf plus 600 sf – 0-1 bedroom 700 sf – 2 bedrooms 800 sf – 3+ bedrooms		

Table B-4: Hillside Residential Development Standards

Development Standard	HR-C	HR-LD	HR-MD	HR-RE	HR-VL
Minimum Lot Area	435,600 sf		217,800 sf	43,560 sf	21,780 sf
Maximum Density (units per acre)	1 du/10 ac		1 du/5 ac	1 du/1 ac	2 du/1 ac
Clustered Development Density	n/a	1 du/5 ac	1 du/2.5 ac	n/a	n/a
Minimum Parcel Width	150 ft				n/a
Minimum Parcel Depth	200 ft				n/a
Setbacks (feet)					
Front	25				
Sides (each)	15				
Rear	50			15	
Height Limit (feet)	35				

Parking requirements in Loma Linda are regulated by residential land use type, as shown in Table B-5.

Table B-5: Residential Off-Street Parking Requirements

Residential Land Use Type	Off-Street Parking Standard
Single-Family Dwelling	2 garage spaces
Multi-family Dwellings	1 garage space – 0-bedroom unit 1 garage space + 0.5 uncovered space – 1 bedroom unit Add 0.5 open space each additional bedroom over 1 Open guest parking spaces shall be provided at 0.25 per bedroom unit
Dormitories and Boarding Houses	1 space per two occupants
Mobile Home Park	2 spaces per mobile home lot
Senior Housing	1 space per unit, half of which shall be covered and at least 20% within a garage
Accessory Dwelling Unit	1 space per unit (No space required under State exemptions)

The Grove Specific Plan and SPA B

The Groves Specific Plan was adopted in 2018 to implement what the 2009 General Plan designated as Special Planning Area D. The Groves Specific Plan accommodates housing of all types, from very low-density residential (10,000 square foot minimum lot size) to senior housing at 25 units per acre. Table B-6 identifies the land use categories that permit residential uses and the associated densities, yielding 1,067 total units. Table B-7 indicates general development standards for residential development. The standards vary by planning area rather than residential use category.

Both the Groves Specific Plan and SPA B accommodate a range of housing types at densities that include affordable housing developments, with the Groves Specific Plan explicitly stating a requirement for affordable housing. As noted on page 3-18 of the Groves Specific Plan, "...each Planning Area within the Mixed Use and Senior Citizen Housing designations is assigned a required affordable/special needs housing requirement. Residential densities within these areas will range from 20 to 25 dwelling units per acre, and a minimum average density of 20 units per acre."

Table B-6: The Groves Specific Plan Residential Land Uses and Planned Yields

Land Use Designation	Density	Planned Yield
<u>Very Low Density Residential</u>	<u>0-2 units/acre</u>	<u>291 units</u>
<u>Low Density Residential</u>	<u>0-4 units/acre</u>	
<u>Medium Density Residential</u>	<u>6-9 units/acre</u>	<u>163 units</u>
<u>High Density Residential</u>	<u>6-13 units/acre</u>	
<u>Very High Density Residential</u>	<u>within Mixed Use</u>	<u>within Mixed Use</u>
<u>Senior Citizen Housing</u>	<u>20-25 units/acre</u>	<u>213 units</u>
<u>Mixed Use (Very High Density)</u>	<u>Minimum average 20 units/acre to fulfill affordable housing objectives</u>	<u>400 units</u>

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Table B-7: Development Standards for The Groves - Generalized

Development Topic	Standard
<u>Building Height</u>	<u>Low Density Residential</u> <ul style="list-style-type: none"> • <u>3 stories and 35 feet maximum</u> <u>Medium Density Residential</u> <ul style="list-style-type: none"> • <u>2 story minimum/3 stories and 35 feet maximum</u> <u>High Density Residential</u> <ul style="list-style-type: none"> • <u>2 story minimum/3 stories and 35 feet maximum</u> <u>Senior Housing, Very High Density, and Mixed Use</u> <ul style="list-style-type: none"> • <u>2 story minimum/3 stories and 35 feet maximum</u>
<u>Setbacks</u>	<u>Dependent upon frontage type. Ranges from 0 to 20 feet.</u>
<u>Lot Coverage</u>	<u>Low Density Residential: 40%</u> <u>Medium Density Residential: no maximum</u> <u>High Density Residential: no maximum</u> <u>Senior Housing, Very High Density, and Mixed Use: no maximum</u>
<u>Parking</u>	<u>Senior housing: 1 space/unit</u> <u>Studio : 1 space/unit</u> <u>1-bedroom: 1.5 spaces/unit</u> <u>2-bedroom: 2 spaces/unit</u>

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Table B-7: Development Standards for The Groves - Generalized

Development Topic	Standard
	<p>3+bedroom: 2 spaces/unit for first 2 bedrooms + 0.5 spaces for each bedroom over 2</p> <p>Low Density Residential: 2 garage spaces</p>

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Special Planning Area (SPA) B is located in the northwest section of the City and consists of vacant former agricultural lands and scattered single-family homes. The General Plan envisions a mixed-use village with a maximum of 525 dwelling units, with medium high density (up to 13 units/acre), high density (up to 20 units/acre), and senior citizen housing (up to 25 units/acre) on the vacant properties (implemented by the zoning districts shown in Tables B-2 and B-3).

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On-/Off-Site Improvements

Site improvements and property dedications are important components of new development and contribute to the creation of decent housing. Housing construction in Loma Linda is subject to a variety of site improvement and building code requirements. Developers are generally responsible for covering the full cost of water, sewer, road, and drainage improvements within and to their projects. On-site improvements for subdivisions in Loma Linda are subject to the requirements of Municipal Code Section 16.04.120 and can include:

- Grading, drainage, and drainage structures necessary to proper use and to the public safety
- Portland cement concrete curbs, gutters, sidewalks and drive approaches
- Storm drains, conduits and channels
- Asphalt concrete street paving
- Aggregate base
- Adequate domestic water supply, including the relocation or replacement of all water mains, irrigation lines, and appurtenances as required by the City Engineer
- Sanitary sewer facilities and connections for each lot
- Underground utilities providing services to each lot
- Services from public utilities, where provided, and from sanitary sewers shall be made available for each lot in such manner as will obviate the necessity for disturbing the street pavement, gutter, curb and sidewalk when service connections are made
- Street trees
- Fire hydrants
- Street name signs, and traffic regulatory devices
- Street lights, including ornamental light standards
- The relocation or replacement of all utility lines and poles as required by the City Engineer
- Permanent subdivision survey monuments
- Connecting to the City’s fiber optic network

As is the case with almost all development projects, the costs of on- and off-site improvements are passed along to the homebuyer as part of the final cost of the home. The on- and off-site improvement standards

imposed by the City are typical for most communities and do not pose unusual constraints for housing development.

Locally Adopted Ordinances

State law requires that cities include an analysis of any locally adopted ordinance that directly impacts the cost and supply of residential development. The City does not have any inclusionary requirements for housing development. Further, Title 17 - Zoning does not list short-term rentals as a permitted use type; therefore, they are considered prohibited. In early 2022, the City will adopt an ordinance clarifying that short-term rentals are prohibited in all zones.

The City's voters passed a ballot measure, Measure V, in 2006 to manage growth, specifically for protection of hillside and open space areas. Any changes require a citywide vote. Provisions of Measure V established policies affecting all residential development, such as establishing allowable density for residential land use designations, modifying all land use designations to have a minimum density of zero units per acre, and established a 7,200-square-foot minimum lot size for residential development citywide. Measure V also defines "gross land area" in residential projects as developable land remaining after deducting the area of any floodway easement, utility easement, and the area of the right-of-way of any bordering street.

Measure V established traffic mitigation standards to ensure that traffic levels of service at the time of a development application are maintained. Exempted from this requirement are infill construction of individual single-family homes on existing lots smaller than five acres and bounded on three sides by developed property (at the effective date of Measure V). Rehabilitation, remodeling, or additions to existing single-family residential structures are also exempt. Developments associated with the Loma Linda University Adventist Health Sciences Center are exempt if projects provide student and/or staff housing for Loma Linda University Adventist Health Sciences Center or associated entities.

While Measure V reduced the development potential in the hillside areas, it did not remove all opportunities for development of housing to meet the City's identified need as established by the RHNA based upon the following:

- It does not preclude the ability of the City Council to change land use designations outside of those areas defined within the boundaries of Measure V.
- The land use designations for all other areas were not changed by Measure V and may be amended without voter approval.
- Measure V does not affect density limitations on mixed-use or within other non-residential land use designations which are subject to FAR specifications.
- The 7,200-square-foot minimum lot size requirements of Measure V apply only to detached single-family homes.
- Reducing the intensity of potential development within Loma Linda's hillside areas was one of Measure V's major objectives. The reduction in the allowable density of hillside development in Measure V is intended to recognize the substantial environmental constraints present within the hillside areas.
- The General Plan provides land use capacity to achieve the RHNA at the various income levels.

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2.B Codes and Enforcement

Loma Linda implements the 2019 edition of the California Building Code and 2019 edition of the California Green Building Standards Code. These codes establish standards and require inspections at various stages of construction to ensure code compliance and minimum health and safety standards. Although these standards and the time required for inspections increase housing production costs and may impact the viability of rehabilitation of older properties, the codes are mandated for all jurisdictions in California. The City has not adopted local amendments to the model codes that would directly or indirectly increase housing costs and are typical to the geographic area and those adopted by neighboring jurisdictions.

The City enforces code compliance to promote property maintenance in accordance with the City Zoning and Building ordinances and State and County Health Codes. Code Enforcement staff receives and investigates complaints regarding alleged violations of the Municipal Code such as property maintenance violations, private property parking violations, or zoning violations. Complaints can be submitted over the phone or through the completion of an on-line form available on the City's web site.

All zoning requirements and development standards in Title 17 (Zoning) and for the Groves Specific Plan are available via the City's website. Fees are posted on the website and available in print form at City Hall.

2.C Zoning for a Variety of Housing Types

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. The City of Loma Linda accommodates a wide variety of housing types as summarized below.

Single-family Housing

Single-family housing is allowed by right but subject to design review through the Administrative Review application – Minor process. This is a staff-level review process that requires public notice and an administrative director's hearing.

Duplex and Multi-family Housing

Duplex and multi-family development is permitted by right in the R-2, R-3, and R-4 zones and conditionally in the I-HC (Institutional-Health Care) zone. In November 2021, the City Council adopted objective design standards (ODS) to create a ministerial approval process for multi-family housing projects, including mixed-use projects which include at least a two-thirds residential component pursuant to the requirements of the Housing Accountability Act, SB 35, and SB 330. The ODS regulations apply to any project with two or more units in any zone. For development applications that comply with all ODS standards, projects are approved by the Director without a public hearing. This provision needs to be clarified in the Zoning Code relative to the I-HC zone.

For developers that opt out of ODS compliance for multifamily residential and mixed-use developments, such applications are subject to review and approval by the Planning Commission via the Precise Plan of

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Design – Major process³ regardless of whether a conditional use permit is also required. The Precise Plan of Design – Major process requires a noticed public hearing by the Planning Commission and allows the Commission to weigh in on whether the project would “substantially depreciate property values in the vicinity or would unreasonably interfere with the use or enjoyment of property in the vicinity by the occupants thereof for lawful purposes or would adversely affect the public peace, health, safety or general welfare to a degree greater than that generally permitted by this title” (Loma Linda Municipal Code 17.30.280). Per code provisions, the Commission can only apply such modifications or conditions deemed necessary to ensure a project would not substantially deplete property values, interfere with the enjoyment of properties in the vicinity, or adversely affect peace, health, safety, or general welfare. If the finding is made that a project will not result in the impacts described, the proposed Precise Plan of Design – Major must be approved.

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Housing for Agricultural Employees (permanent and seasonal)

The Employee Housing Act (Government Code Section 17021.5 and 17021.6) requires that any employee housing occupied by six or fewer employees shall be considered a single-family structure within a residential land use and must be treated the same as a single-family dwelling of the same type in the same zone. In addition, employee housing consisting of no more than 36 beds in a group quarters or 12 units or separate rooms or spaces designed for use by a single-family or household must be considered an agricultural land use and be treated the same as any other agricultural activity in the same zone. The City does not specifically distinguish or list Housing for Agricultural Employees as a separate residential land use type but it is City policy to interpret such use as an accessory use to an agricultural use where allowed in a given zone.

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Emergency Shelters

State legislation SB 2 requires jurisdictions to permit emergency shelters without a conditional use permit or other discretionary permits in at least one zone. Emergency shelters are a permitted by-right use in the PF zone; however, the Precise Plan of Review process with the Planning Commission is still required to ensure an application conforms with the standards of use set forth in Municipal Code Section 17.44.030.A. These standards include:

- Allowing up to 150 beds per establishment
- Requiring on-site management
- Having a written security plan
- Providing storage space for clients’ possessions

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Approximately 10 acres of land are designated PF in the City. These properties are located near City Hall and the City’s Public Works Department Corporate Yard. The availability of land can easily accommodate shelters for the 27 unsheltered homeless persons identified in Loma Linda during the 2020 Point-In-Time Homeless Count.

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³ Precise Plan of Design – Minor only applies to single-family homes and projects between 120 and 500 square feet in total building area.

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AB 101 of the 2019 legislative session requires that low-barrier navigation centers be allowed as a by-right use in areas zoned for mixed-use and nonresidential zones permitting (by right or conditionally) multi-family uses. The City of Loma Linda does not specifically list low-barrier navigation centers as a land use type in any of its zoning districts. The City will revise the Land Use Development Code (Title 17) to ensure that the City meets the requirements of AB 101.

Transitional and Supportive Housing

State law requires cities to allow transitional and supportive housing as a residential use and allowed by right in all zones that allow similar residential uses, consistent with SB2. In Loma Linda, transitional and supportive housing are not directly defined as a land use type in the Land Development Code. The City has relied upon the character of the development, not necessarily the population being served by this type of housing in determining where such uses are allowed. Group homes serving six or fewer persons are considered a residential use and permitted in all zones where residential uses are permitted and thus held to the same development standards as other residential uses of the same type in the same zone. Larger-sized group homes are restricted to the R-3 and R-4 zones and require conditional use permit approval. The City will revise the Land Use Development Code to comply with SB2.

Effective January 1, 2019, AB 2162 (Supportive Housing Streamlining Act) requires supportive housing to be considered a use by right in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses, if the proposed housing development meets specified criteria. The law prohibits the local government from imposing any minimum parking requirement for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop. AB 2162 also require local entities to streamline the approval of housing projects containing a minimum amount of supportive housing by providing a ministerial approval process, removing the requirement for CEQA analysis, and removing the requirement for a CUP or other similar discretionary entitlements. The City will revise the Land Use Development Code to ensure AB 2162 compliance.

Single-Room Occupancy (SRO)

Single-room occupancy hotels and/or boarding homes are collectively referred to as SROs. SRO units are one-room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. Buildings that provide SRO dwellings are classified by Loma Linda as boarding and lodging houses and permitted in the R-3 and R-4 zones through the approval of a conditional use permit.

Mobile Homes/Manufactured Factory-built housing

State law requires that mobile and manufactured homes be considered a single-family dwelling and permitted in all zones that allow single-family housing. Manufactured housing can be subject to design review. Mobile home dwellings are permitted by right within the R-1, R-2 and all of the City's Hillside Residential (HR) zones.

Accessory Dwelling Units (ADU)

Accessory dwelling units (ADUs) can be an important source of affordable housing since they are smaller than primary units and do not have direct land acquisition costs. ADU development expands housing opportunities for very low-, low-, and moderate-income households by increasing the number of rental units available within existing neighborhoods. In Loma Linda, consistent with the Government Code Section 65852.2, ADUs are permitted by right in all residential zones, and Junior ADUs are permitted by right where single-family dwellings are allowed, subject to all development standards of the underlying zoning district with certain exceptions as required under State law.

In 2021, the City adopted a comprehensively updated ADU ordinance as a new Chapter in Title 17. These new regulations were adopted to comply with State legislation, including those passed since 2017 that made numerous changes to the ADU requirements to facilitate their development. These include allowing ADUs to be built concurrently with a single-family home, opening areas where ADUs can be built to include all zoning districts that allow single-family uses, modifying fees from utilities such as special districts and water corporations, and reducing parking requirements. Loma Linda submitted the ordinance to HCD within 60 days of its adoption, in compliance with State law.

Housing for Persons with Disabilities

Housing element law requires that in addition to the needs analysis for people with disabilities, the housing element must analyze potential governmental constraints to the development, improvement, and maintenance of housing for people with disabilities; demonstrate local efforts to remove any such constraints; and provide for reasonable accommodations for persons with disabilities through programs that remove constraints.

Zoning and Land Use

Under State Lanterman Developmental Disabilities Services Act (Lanterman Act), small State-licensed residential care facilities for six or fewer persons must be permitted in all zones that allow single- or multi-family uses, subject to the same permit processing requirements and development standards. Loma Linda distinguishes between group homes and residential care facilities. A group home is defined as “a single-family dwelling or multi-unit facility that provides twenty-four-hour medical and/or non-medical care of persons who are in need of personal services, supervision, or assistance essential for addressing issues of mental illness and substance-abuse. Examples include halfway houses, board and care homes, clean and sober homes, rehabilitation centers, and the like. This use type includes both unlicensed facilities and those licensed or supervised by a federal, state, or local health/welfare agency.” The definition distinguishes between group homes with six or fewer residents (plus an employee) and those with seven or more residents. Group homes with six or fewer residents are permitted by right, whereas larger homes are not permitted in R-1 and R-2 zones and require a Minor Use Permit in R-3 and R-4 zones. These regulations comport with State law.

Title 17 does not provide for a reduction in parking requirements specific to housing for persons with disabilities. The City is not in full compliance with the Lanterman Act and will update its Land Use Development Code to comply.

Definition of Family

Loma Linda’s Land Use Development Code defines “family” to mean “an individual living alone, or two or more persons living together, related by blood or marriage, and shall include stepchildren and children by adoption, or a group of not more than three persons who are not related by blood or marriage, or as stepparents or stepchildren, or as adopted parents and adopted children, and excluding therefrom domestic help, provided the group of persons are living together as a single housekeeping unit in a dwelling unit with one kitchen.” The City will amend or eliminate this definition to be more inclusive and not cap the number of unrelated persons.

Reasonable Accommodation

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a modification is reasonable depends on the circumstances and must be decided on a case-by-case basis. Therefore, while the City allows for reasonable accommodations for persons with disabilities, it does not have a formal procedure for making reasonable accommodation exceptions as part of the development review process. The City will enact provisions to make reasonable accommodation exceptions for persons with disabilities in the land use and zoning application, review, and approval process.

2.E Fees and Exactions

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. Impacts fees are also charged to cover the cost of providing municipal services or mitigating project impacts. These fees are summarized in Table B-8. The total fee amount varies from project to project based on type, existing infrastructure, and the cost of mitigating environmental impacts. The City does not control school fees as they are established by the school districts within the parameters allowed by State law.

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Table B-8: Development Fees

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Fee Category	Fee Amount			
Planning and Application Fees				
Annexation	\$15,000 deposit + outside costs			
Variance (Minor)	\$200 owner-occupied single-family residence \$865 all others (to recover 50% cost)			
Variance (Major)	\$250 owner-occupied single-family residence \$2,560 all others			
Conditional Use Permit or Precise Plan of Design Review	\$5,345 – New up to 4 units Multi-Family Residential \$5,345 – New <20,000 sq. ft. \$6,945 – New >20,000 sq. ft. \$5,375 – Existing Non-Residential			
General Plan Amendment	\$5,105 per application – Text \$4,600 per application Map Any outside work to be passed through to the applicant			
Development Code Amendment	\$2,490			
Preliminary Review	\$2,820 per application with 50% of the fee to be credited against future fees if the project is actually submitted			
Small Project Review or Single-family Residential	\$1,640			
Zone Map Change Review	\$4,005			
Subdivision				
Certificate of Compliance	\$715			
Lot Line Adjustment	\$2,070			
Tentative Tract Map	\$5,965 + \$10 per lot			
Tentative Parcel Map	\$4,870 + \$10 per lot for every lot over 9 lots			
Environmental				
Initial Environmental Study	\$4,385 + \$205 per technical study			
Environmental Impact Report	\$15,000 deposit with charges at the fully allocated hourly rates for all personnel involved plus any outside costs			
Capital Facilities Fees				
	Per Detached Unit	Per Attached Unit	Per Mobile home Unit	Per Senior Housing Unit
General Government Facilities	\$393			
Parkland Acquisition and Development	\$12,489	\$7,459	\$7,636	\$5,515
Public Meeting Facilities	\$1,575	\$941	\$963	\$696
Art in Public Places	\$0.0025 x residential building valuation			

Table B-8: Development Fees

Fee Category	Fee Amount			
Fire Suppression	\$1,120	\$142	\$771	\$1,448
Local Circulation Systems	\$1,551	\$893	\$779	\$307
Regional Circulation Systems	\$3,741	\$2,154	\$1,879	\$740
Storm Drainage Facilities	\$1,331	\$311	\$296	\$197
Water	\$5,826	\$4,303	\$3,951	\$1,908
Sewer	\$1,073	\$793	\$726	\$351

Source:

Planning and Application Fees, City of Loma Linda, 2021, Effective January 1, 2016
Capital Facilities Fees, City of Loma Linda, last updated August 21, 2015

Most, if not all, developers consider any fee a significant constraint to the development of affordable housing. For affordable housing projects, financing generally includes some form of State or federal assistance, with rents set through the funding program. As such, fees cannot and do not increase the rents for affordable housing. Although the various fees account for a significant portion of the development cost, the fees collected are necessary to pay for much needed infrastructure and to help mitigate the impacts of new development.

Table B-9 identifies the fees that were collected for a new detached single-family house approved by the City in 2020 and a 213-unit multi-family housing project with a 4,200-square-foot retail commercial component. Development fees make up approximately four to six percent of a home purchase price. Most of the City of Loma Linda fees are typical and are comparable to those of surrounding communities and are based upon pro-rata share of upgrades or expansion of capacity of City services and infrastructure. The City does not currently offer fee assistance to market or affordable housing and a program to address possible deferrals or reduced fees to address special needs housing will be implemented.

Table B-9: Proportion of Fee in Overall Development Cost for A Typical Residential Development

Development Cost for a Typical Unit	Single-Family	Multi-family
Total calculated fees per unit	\$29,602.29	\$17,623.74
Typical estimated cost of development per unit	\$478,000 (average MLS)	\$94,000 (building valuation per unit)
Estimated proportion of fee cost to overall development cost per unit	6.2%	18.7%

2.F Processing and Permit Procedures

Processing and permit procedures may pose a considerable constraint to the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of

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approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer. The City of Loma Linda’s development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. Table B-10 shows timeframes of when the applicant can expect a decision on an application beginning from when a complete application is submitted, including when additional information is required by the City.

Table B-10: Timelines for Permit Procedures

Type of Approval, Permit, or Review	Typical Processing Time
Ministerial Review	4-6 weeks
Conditional Use Permit/Variance	4-8 weeks
Zoning Amendment (Zone Change)	3-6 months
General Plan Amendment	3-6 months
Precise Plan of Design	4-8 weeks
Subdivisions Maps	3-6 months
Initial Environmental Study	8-10 weeks
Environmental Impact Report	6-9 months

Single-family dwelling unit applications typically take two to four weeks for a single unit on one lot and three to six months if part of a subdivision to obtain a tentative map and building permits. Multi-family development applications take two to four months. Table B-11 generally identifies the typical approvals required for single-family and multi-family projects, along with the estimated processing times of the planning and building departments.

Table B-11: Typical Processing Procedures by Project Type

	Single Family Unit	Subdivision	Multi-family < 20 units	Multi-family > 20 units
Typical Approval Requirements	Administrative Review Committee	Administrative Review Committee	Administrative Review Committee	Administrative Review Committee
	Administrative Public Hearing	Planning Commission	Planning Commission	Planning Commission
	Plan Check	City Council	Plan Check	City Council
	Permitting	Final Map	Permitting	Plan Check
	Inspection	Plan Check	Inspection	Permitting
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	Planning/Building Final	Planning/Building Final	Planning/Building Final	Planning/Building Final

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Table B-11: Typical Processing Procedures by Project Type

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		Single Family Unit	Subdivision	Multi-family < 20 units	Multi-family > 20 units
Estimated	Total	Planning = 45 days	Planning = 6 – 12 mo.	Planning = 3-6 mo.	Planning = 3-6 mo.
Processing Time		Building = 45 days	Building = 60 days	Building = 90 days	Building = 90 days

Source: City of Loma Linda, 2021

Planning Division Review and Ministerial Permits

The development of a single-family dwelling and/or an ADU requires submittal of a site plan. The Planning Division in conjunction with the Administrative Review Committee (staff level) reviews a site plan for a single-family dwelling and/or ADU within four weeks or less. Single-family dwellings are subject to a director-level Administrative Public Hearing before they are considered approved. Planning Division review of routine over-the-counter permits is limited to ADUs and minor modifications to existing single-family dwellings such as fence, wall, or patio cover permits. Most other residential development review requires consideration and approval by the Planning Commission regarding design and an objective review for compliance with zoning standards.

Planning Commission Review and Discretionary Permits

The conditional use permit review process is intended to apply to uses that are generally consistent with the purposes of the district where they are proposed but require special consideration to ensure that they can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the infrastructure, the built or natural environment, City resources, or the City's ability to provide public services. As described above, the City also requires submittal of an application for Precise Plan of Design (Minor or Major) for all development proposals. Both require public hearings, with applications reviewed and approved by the Planning Commission. Conditional use permits are required for senior housing developments in the R-3 and R-4 zones and multi-family housing in the I-HC zone. However, multi-family development is permitted by right in the R-3 and R-4 zones. Multi-family development in these zones is subject to approval by the Planning Commission via a Precise Plan of Design - Major.

The City's processing and permit procedures are not a constraint on the development of housing. The Community Development Department continues in its efforts to reduce paperwork and processing time for all development project applications. The time frames are highly dependent on the applicant's accurate and timely response to City staff comments. For affordable housing developments, the key time constraint is not the permitting and processing procedures, but the time involved in obtaining funding from sources other than the City. However, because the Planning Commission meets only once each month, the scheduling time frame might be considered an added burden for the development application review process. The City does hold the third Wednesday of each month for special meetings if needed to expedite processes.

Environmental Review

State regulations require environmental review of discretionary project proposals (e.g., subdivision maps, precise plans, use permits, etc.). The timeframes associated with environmental review are regulated by the California Environmental Quality Act (CEQA). In compliance with the Permit Streamlining Act, City staff ensures that non-legislative proposals are heard at the Planning Commission within 60 days of receipt of an application being deemed complete.

SB 35 Approval Process

SB 35 requires cities and counties to streamline review and approval of eligible affordable housing projects by providing a ministerial approval process, exempting such projects from environmental review under CEQA. When the State determines that jurisdictions have insufficient progress toward their lower-income RHNA (very low and low income), these jurisdictions are subject to the streamlined ministerial approval process (SB 35 [Chapter 366, Statutes of 2017] streamlining) for proposed developments with at least 50 percent affordability. If the jurisdiction also has insufficient progress toward their above-moderate-income RHNA, then they are subject to the more inclusive streamlining for developments with at least 10 percent affordability. SB 35 will automatically sunset on January 1, 2026.

As of July 2021, the City of Loma Linda was determined to be subject to SB 35 streamlining requirements for proposed infill housing developments that comply with existing zoning and provide ten percent or more of the units for lower-income families. The City has not received any applications or inquires for SB 35 streamlining. To accommodate any future SB 35 applications or inquiries, Program 3.1 calls for the City to create and make available to interested parties an informational packet that explains the SB 35 streamlining provisions in Loma Linda and provides SB 35 eligibility information.

In November 2021, the City adopted a new chapter in Title 17 establishing objective design standards to be applied to multi-family development and mixed-use development projects with a two-thirds residential component.

Environmental Constraints

Flooding

Portions of Loma Linda historically have been vulnerable to flooding associated with Mission Channel and the Santa Ana River, as well as small-scale floods originating on hillsides in the southern portion of the City. Major roadways that cross over water courses/channels include Anderson Street and Barton Road (San Timoteo Creek), Redlands Boulevard (Mission Channel), and Beaumont Avenue (San Timoteo Creek). In addition, the northern portion of the City lies within the inundation area of the Seven Oaks Dam, the failure of which would impact the City. Improvements to San Timoteo Creek have removed most areas of the City from flooding hazards. The areas adjacent to the Mission Channel are mostly business park areas and a medium high-density residential area that is already built out. Additionally, the areas in the southern portion of the City are designated at a very low density, which will allow development to avoid hazards such as flooding. Therefore, flooding hazards will not hinder the development of new residential units.

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Steep Slopes

The southern portion of the City (commonly known as the South Hills) has steep natural slopes, some of which are susceptible to instability. The types of instability anticipated include deep seated landslides, surficial soil slips, wet debris flows, and surficial creep. Most of the mapped landslides appear to be relatively recent (less than 11,000 years). Other deep-seated landslides smaller in size and not as geomorphically pronounced are suspected to exist in the steep terrain of the southern portion of the City. These areas are designated for very low density to avoid hazards related to steep slopes and unstable ground, and to protect natural resources within the hillside area. The need to avoid hazards and protect resources is the basis for allowable densities in this area.

Fault Zones

Four faults traverse Loma Linda. The San Jacinto Fault zone crosses the southwest portion and has been the most historically active fault zone in Southern California. Numerous offset gullies, linear ridges, and other fault-related features indicate active faulting along the Claremont branch of the San Jacinto Fault. The Loma Linda Fault has been mapped as crossing the northern portion of the City. This fault originally was identified from groundwater data and lacks topographic evidence. No evidence of active faulting has been identified.

The Banning Fault is a trace of the San Andreas Fault, extending westward from the San Geronio Pass. The fault has been mapped crossing the northeast corner of Loma Linda. This fault is not generally thought to be active. The Live Oak Canyon Fault, with many branches nearby, has been mapped in eastern portion of the south hills. This fault is not generally thought to be active.

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo) was passed in 1972 to mitigate the hazard of surface faulting to structures built for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The San Jacinto Fault, considered to be active, has been mapped in the southern portion of Loma Linda. An earthquake hazard zone has been established along the trace of this fault. Investigations of the San Jacinto Fault have recommended building setbacks varying from 50 to 100 feet. The southern portion of the City is designated for very low-density residential uses, which will allow development to avoid hazards related to this fault. Also, the units that will be developed within this area will be required to meet safety standards related to earthquake hazards.

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Appendix C

HOUSING RESOURCES

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State law requires that jurisdictions provide an adequate number of sites to allow for and facilitate the production of their regional share of housing. To determine whether a jurisdiction has enough land to accommodate its share of regional housing needs for all income groups, that jurisdiction must identify “adequate sites.” Under State law (California Government Code Section 65583[c][1]), adequate sites are those with appropriate zoning and development standards—with services and facilities—needed to facilitate and encourage the development of a variety of housing for all income levels.

This section provides an overview of available sites in Loma Linda for future housing development and evaluates how these resources can work toward satisfying future housing needs. Also discussed are the financial and administrative resources available to support affordable housing.

Regional Housing Needs Allocation (RHNA)

The sixth cycle RHNA for the Southern California Association of Governments (SCAG) region covers the 8.3-year planning period of June 30, 2021 to October 15, 2029. The RHNA is divided into four income categories: very low, low, moderate, and above moderate. SCAG has assigned Loma Linda an allocation of 2,051 units to be accommodated during this planning cycle, with the units divided among the four income categories shown in Table C-1. The City of Loma Linda is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build these units. This includes the creation, adoption, and implementation of General Plan policies, zoning and development standards, and/or incentives to encourage the construction of various types of units.

Table C-1: RHNA Allocation 2021-2029

Income Group	Total Housing Units	Percentage of Units
Extremely/Very Low-Income (0-50% AMI)*	523	25%
Low-Income (51-80% AMI)	311	15%
Moderate-Income (80-120% AMI)	352	17%
Above Moderate-Income (121+% AMI)	865	42%
<i>Total</i>	<i>2,051</i>	<i>100%</i>

Notes:

AMI: Area Median Income

* Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation (261 units).

Progress toward the RHNA

Since the RHNA uses June 30, 2021 as the baseline for growth projections for the planning period, jurisdictions may count any housing units permitted or approved from June 30, 2021 to the start of the Housing Element planning period (October 15, 2021) against the RHNA allocation.¹

Approved and Pipeline Projects

Approved Projects

Approved residential development projects credited toward the RHNA consist of five projects, as discussed immediately below. Combined, these approved projects can accommodate 441 units (Table C-2) and address a portion of the moderate- and above moderate-income RHNA for 2021-2029.

The Groves Specific Plan – Map 20327

This condominium project was approved in 2020. Construction is anticipated to begin in 2021. The project consists of 57 condominiums located in Planning Area 3-2 of the Groves Specific Plan area, near the intersection of Bryn Mawr and Park Avenues. Corelogic's Southern California Resale Activity report (December 2020) estimates a median sales price of \$298,000 for condominiums in Loma Linda. The 57 units are credited against the moderate-income RHNA, as median sales prices for the condominiums are less than the \$300,000 to 400,000 range considered affordable for moderate-income households in Loma Linda.

The Groves Specific Plan - Park Ave 212 Senior Living Apartments

This senior housing project was approved in 2020. The project consists of 213 units with the following breakdown: 12 studios, 125 one-bedroom units, and 76 two-bedroom units. One of the units will not be rented; it will remain a model unit. The site is in sub-area PA 2-4 of the Specific Plan, on Park Avenue east of Bryn Mawr Avenue. None of the units will be marketed as affordable, as all are expected to fall within the above-moderate income category.

The Groves Specific Plan - Tentative Tract Map 20417

Tentative Tract Map 20417 subdivided the 29 acres within Planning Area 3-6 of The Groves at Loma Linda Specific Plan to create 52 estate-style residential lots at a minimum of 10,000 square feet each, along with road improvements and trail connectors throughout the development.

Tentative Tract Map 20442

Tentative Tract Map 20442 subdivided two parcels totaling 12.32 acres to create four parcels, including a lettered lot for an open space paseo. The project will produce 103 condominium units.

¹ The Housing Element planning period differs from the RHNA Planning period. The 6th Cycle RHNA covers a 10-year planning period of December 31, 2018 to December 31, 2028. The Housing Element covers an 8-year planning period of December 31, 2020 through December 31, 2028.

Tentative Tract Map 20226

Tentative Tract Map 20226 entitled a 16 lot single-family residential subdivision and one lettered lot for open space, drainage, and landscape purposes on 4.52 acres on two existing parcels located south of 1st Street and west of California Street.

Pipeline Projects

An additional 146 units, including 20 affordable to moderate-income households, are considered in the pipeline of development, where the City has conducted initial discussions with a developer and the project is considered likely to proceed through the permitting process.

- Canyon Ranch is a 67.9-acre site within the City's sphere of influence, just outside the City limits near Bermudez Street and San Timoteo Canyon Road. The annexation, subdivision map, General Plan Amendment, and rezoning applications are well underway with the City, with approval expected in 2022. The site is pre-zoned with a combination of General Commercial (C2), Low Density Residential (R-1), and Very Low Density Residential (HR-VL) zoning. To support the subdivision, the site will be rezoned. Home sites will include a mix of 20,000- and 7,200-square-foot lots with a total of 126 single-family homes.
- The project at 25239 Cottage Avenue is a 2.47-acre infill property zoned High Density Residential (R-3) near the intersection of Cottage and Lilac Avenues. The maximum allowed density is 13 units per acre. It is assumed that development at this density will create units affordable at a moderate-income level based on market costs for this type of housing. This is consistent with the approach used for the Residential Sites Inventory discussed below. The City anticipates that a maximum of 20 units can be built on the site given its odd shape. The applicant filed a pre-application but has not proceeded with an official application. The applicant is aware of the R3 zoning allowing up to 13 units per acre and may resubmit for a higher yield; however, at this time only 20 units total are assumed.

Approved residential development projects credited toward the 2021-2029 RHNA can accommodate 441 units (Table C-2) and address a portion of the low-, moderate, and above moderate-income RHNA. Pipeline projects account for another 142 units. The City has a remaining RHNA of 1,468 units to be addressed through sites identification.

Table C-2: Approved & Pipeline Projects Affordability Distribution

Affordability Distribution	Ex./Very Low (0-50% AMI)	Low (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	Total
Approved Projects					
Specific Plans:					
Park Ave 212 senior housing (The Groves)	--	--	--	213	213
Map 20327 for 57 Condos (The Groves)	--	--	57	--	57
Map 20417 (52 residential estates)				52	52
Map 20442 (103 condos)				103	103
Map 20226 (16 lots)					16
<i>Subtotal</i>	--	--	57	384	441
Pipeline Projects					
Canyon Ranch	--	--	--	122	122
25239 Cottage Ave	--	--	20	--	20
<i>Subtotal</i>	--	--	20	122	142
<i>Total Approved & Pipeline Projects</i>	--	--	77	506	583
2021-2029 RHNA	523	311	352	865	2,051
<i>Remaining RHNA: Surplus/Remaining (+/-)</i>	-523	-311	--275	-335	-1,468

Residential Sites Inventory

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction’s share of the region’s projected growth. After accounting for approved and pipeline projects, the City has a remaining RHNA of 1,468 units distributed across the four categories. Based on a review of the vacant and underdeveloped sites in the city, various residential and mixed-use development opportunities exist with sufficient capacity to meet and exceed the identified housing need. Vacant and underutilized sites identified in the 2014 Housing Element were reused for the inventory. Each site was evaluated using the City’s geographic information system (GIS) and aerial photography to confirm that it was still undeveloped. A detailed listing of sites, consistent with State law, has been prepared as a separate excel file.

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Sites Inventory Methodology

Realistic Capacity

Consistent with HCD guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. The High Density Residential (R-3) zone allows residential development at a density up to 13 units per acre. The Groves Specific Plan mandates that the sites designated for Mixed-Use (MU) residential development be developed at a minimum density of 20 units per acre.

Special Planning Area G, south of City Hall, is a site of approximately 20 acres designated in the General Plan Land Use Element for a mix of medium density (0-9 units per acre) and senior housing (0-25 units per acre). This site has a potential of 335 units.

Special Planning Area B, generally defined as east of Anderson Street and north of Van Leuven Street, is approximately 42.5 acres. The 2014-2021 Housing Element indicated a potential for 499 dwelling units, with 419 in the extremely/very-low-income category and 83 in the moderate-income category. The site has not changed since adoption of the prior element, so the development potential estimates are carried forward. Based on the intent of designations and the potential for the development of non-residential uses, the realistic capacity assumptions are listed below.

- The development potential for R-1 zoned sites have been included in the sites inventory unless conditions have changed relative to the prior cycle. R-1 sites were considered to have development potential at 100 percent of allowed density since single-family subdivision developers historically have been achieving maximum densities. Sites smaller than 0.25 acres were considered to accommodate one dwelling unit. These sites are assigned to the Above Moderate income category.
- One 2.28-acre site is zoned Planned Community (PC). This designation allows a variety of land uses, including planned residential developments. Residential development could include condominiums, small lot single-family, or traditional single-family. It is conservatively estimated that this site could be developed with seven single-family residences at 80 percent of the capacity at four dwellings per acre. These units are assigned to the Above Moderate-Income category.
- The development potential for sites zoned Hillside Conservation (HR-C) and Rural Estates (HR-RE) was assumed at 100 percent of allowed density.
- The High Density Residential (R-3) designation provides locations for multiple-family residential development at densities up to 13 dwelling units per acre. To account for land use controls and site improvements, realistic capacity is calculated based on 80 percent of the total raw capacity for the R-3 zoned sites, which is approximately 10 dwelling units per acre. Sites smaller than 1/13 of an acre were considered to accommodate one dwelling unit. Sites with frontage of less than 50 feet and odd-shaped sites were assigned less development potential. The evaluation of each site creates a conservative estimate for projects within the City of Loma Linda, as development generally occurs at the highest potential density.

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- The Groves Specific Plan specifies the projected residential development for each of the planning sub-areas. Those unit counts are utilized for the RHNA (Table C-3). Projects that utilize a density bonus, consistent with State law, can achieve up to 35 dwellings per acre for projects with eligible amenities or improvements. One of those amenities is parcel consolidation. The designation’s intent to develop primarily residential uses, allowances for non-residential uses that do not lower allowable densities, and the addition of a potential density bonus ensure that development will most likely come in at the top end of the allowable density; as such, the use of 80 percent of raw capacity is reasonably conservative.

The sites inventory assumes that properties will be developed toward the higher end of the maximum allowed density based on trends the City has observed. The following projects, both in process and approved, demonstrate these trends. In particular, projects within The Groves Specific Plan achieve the maximum allowed densities (or allowed unit maximums within a planning area) and fulfill the requirements in the Specific Plan for provision of affordable housing.

- The Veterans’ Village project, now complete, yielded 87 units at 20 units per acre (maximum allowed density).
- A duplex on Lind Avenue on a 0.24-acre site yielded a density of 8.3 units per acre (maximum allowed density of nine units per acre).
- A senior housing development within The Groves, with a maximum allowable density of 25 units per acre, was approved for 213 units at 23.7 units per acre.
- The Harmony Park condominium development within The Groves was approved for 57 units; the plan calls for a maximum of 60 units within the subject planning area.
- Within Planning Area 5 of The Groves, a 12.4-acre site designated Medium Density Residential (up to nine units per acre) has a pending application for 103 units, yielding 8.3 units per acre.

Almost all sites included in the sites inventory are zoned exclusively for residential use. Only six sites are zoned for mixed use development (Planned Community); those lie within The Groves Specific Plan, which identifies a planned residential unit yield within each planning area. Fifteen sites, all within Special Planning Area C, are zoned Institutional-Healthcare, with several under the control of Loma Linda University. The City has been in discussions with the University regarding preparation of a specific plan for its properties that would include provision for housing, which the University recognizes is needed for staff and graduate students. Therefore, the City has a reasonable expectation that the sites included in the inventory will develop with residential uses. While current zoning regulations require a conditional use permit for housing in the Institutional-Healthcare zone, the City considers this a temporary land use regulation pending development of a cohesive plan for Special Planning Area C.

Densities Appropriate for Accommodating Lower-Income Housing

The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least 20 units per acre for Loma Linda), HCD is obligated to accept sites with those density standards as appropriate for accommodating the jurisdiction’s share of regional housing need for lower-income households. In Loma Linda, the R-3 zone

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maximum density is 13 units per acre. Thus, sites identified as vacant or underutilized in the sites inventory are assumed to be in the Above Moderate-Income category, with these exceptions:

- The Groves Specific Plan establishes a density of 20 units per acre or higher for multi-family housing and mixed-use development. Thus, these types of housing within the specific plan have been assigned to the Extremely/Very Low-Income category.
- Available residential capacity in the R-3 zone has been assigned to the Moderate-Income category because they will be developed at a maximum density of 13 dwelling units per acre. This density should ensure that they will be affordable at a level just below the Above Moderate-Income category.
- Although a portion of Special Planning Area G is designated for Senior Housing at a maximum density of 25 dwelling units per acre, staff has conservatively estimated that the residential development would be in the Moderate and Above-Moderate-Income categories.

Assembly Bill 1397

Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is made up predominately of sites between 0.5 and 10 acres in size, as the State has indicated these size parameters are most suitable for accommodating lower-income housing need. Most of the sites included in the inventory smaller than 0.5 acres are zoned R-1. For the R-3 zoned properties smaller than 0.5 acres, a few are in common ownership, thus offering the potential for lot consolidation. Program 1.1 in the Housing Plan includes an action to establish a lot consolidation ordinance.

A total of 72 sites are less than 0.5 acres or greater than 10 acres. Of these, a vacant 10.85-acre site in Special Planning Area D, The Groves Specific Plan, is estimated to have potential for approximately 99 units of lower-income housing (as noted in the prior Housing Element). The Groves Specific Plan designates the site, which is a portion of The Groves Planning Area 3-3, for Mixed-Use development at a minimum density of 20 units per acre. This site was also identified in the last two Housing Elements. No other vacant sites greater than 10 acres have potential for lower-income housing.

Two vacant sites less than 0.5 acres have potential for approximately five units of lower-income housing. Both are small properties within Special Planning Area B. The area is zoned for Institutional-Healthcare development, but the development intent articulated in the Housing Element is for mixed-use development with residential, commercial, institutional, and educational uses. Residential development is intended to be at medium and high density, including senior housing. None of Special Planning Area B has been developed in the manner defined in the last Element nor in the draft for this cycle. Both small properties were also identified in the last two Housing Elements. No other vacant sites less than 0.5 have potential for lower-income housing.

No High Density Residential (R-3) sites over 10 acres in size with development capacity were identified.

The reuse of vacant and non-vacant sites in the sites inventory is consistent with the requirements under AB 1397. Non-vacant sites included in a prior planning period's housing element (i.e., fifth cycle) and

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2021-2029 Housing Element

vacant sites included in two or more consecutive planning periods (fourth and fifth cycles) must allow residential use by right at specified densities for housing developments in which at least 20 percent of the units are affordable to lower income households. Sites that are subject to the provisions of AB1397 and are indicated as such in the sites inventory table.

Residential Sites Inventory

The Housing Element Sites Inventory consists of accessory dwelling unit (ADU) projections and vacant residential and mixed-use sites. Together, these sites ensure that the remaining RHNA can be accommodated during the planning period. The sites have no identified constraints that would prevent development or reuse during the Housing Element period. Table 3 summarizes the sites inventory (see also Figures C-1 and C-2).

Table C-3: Sites Inventory Summary

	Ex./Very Low (0-50% AMI)	Low (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	Total
RHNA					
2021-2029 RHNA	523	311	352	865	2,051
APPROVED PROJECTS					
Park 212	0	0	0	213	213
TTM 20327 for 57 Condos (The Groves)	--	--	57	--	57
TTM 20417				52	52
TTM 20442				103	103
TTM 20226					16
<i>Subtotal</i>	--	--	57	384	441
PIPELINE PROJECTS					
Canyon Ranch	0	0	0	122	122
25239 Cottage Street	0	0	20	0	20
<i>Subtotal</i>	0	0	20	122	142
SITES INVENTORY					
1. ADU Production					
Estimated ADU Production***	38	58	58	13	167
2. Vacant Land					
Hillside Conservation (HR-C), Rural Estates (HR-RE), Low Density Residential (R-1) and Planned Community (PC) Sites*	0	0	0	419	419

Table C-3: Sites Inventory Summary

	Ex./Very Low (0-50% AMI)	Low (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	Total
High Density Residential (R-3) Sites*	0	0	288	0	288
Very High Density (R-4) Sites*	0	8	0	0	8
The Groves Mixed Use sites: Mixed Use/Very High Density (MU/VHD) residential component*	307	0	0	0	307
The Groves Single-Family sites (Medium Density Residential)*	0	0	0	103	103
Special Planning Area G (Senior Housing (R-4) and Medium Density Residential (R-2))*	0	0	225	110	335
<i>Subtotal</i>	<i>345</i>	<i>66</i>	<i>571</i>	<i>645</i>	<i>1,627</i>
3. Underutilized Sites					
Special Planning Area B (Institutional-Healthcare (I-HC) and Open Space (OS))*	416	0	83	0	499
The Groves Single-Family sites (Very Low Density Residential)*	0	0	0	60	60
The Groves Mixed Use site: Mixed Use/Very High Density (MU/VHD) residential component*	93	0	0	0	93
HR-RE sites*	0	0	0	24	24
R-1 sites*	0	0	0	41	41
R-3 sites*	0	0	288	0	288
<i>subtotal</i>	<i>509</i>	<i>0</i>	<i>371</i>	<i>125</i>	<i>1,005</i>
TOTAL PROJECTS/SITES					
Total	892	66	1,019	1,289	2,844
REMAINING RHNA					
Surplus/deficit (+/-)	+369	-245	+667	+424	+1,215
<u>Lower-income households</u>	<u>+124</u>		<u>+667</u>	<u>+424</u>	<u>+1,215</u>

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*Affordability based on density

** Affordability based on market prices

*** SCAG estimates an affordability breakdown of ADUs as follows: 15% extremely low-income, 8% very low-income, 35% low-income, 35% moderate-income, and 8% above moderate-income. 6th Cycle Housing Element Update Technical Assistance – ADU Affordability Analysis, August 27, 2020.

ADU Projections

As allowed by State law, a projection of ADU development during the planning period is included in the sites inventory. In 2020, the City approved 16 ADUs. The demand for ADUs in Loma Linda has been increasing due to the need for affordable housing, especially demand influenced by the operation of Loma Linda University and Medical Center. Demand for ADU development is expected to increase. In May of 2021, the City adopted a new ADU ordinance to encourage development of ADUs and reflect current State law. The City projects that during the planning period (8.3 years), approximately 167 ADUs will be developed (20 per year). The affordability assumptions for the ADUs are based on SCAG's ADU affordability analysis for San Bernardino/Riverside County².

Vacant and Underutilized Sites

The vacant sites inventory includes:

- Eight Hillside Conservation (HR-C) and one Rural Estates (HR-RE) sites totaling nearly 274 acres with a capacity of 48 dwelling units and 73 Low Density Residential (R-1) and Planned Community (PC) sites totaling almost 135 acres with a capacity of 371 dwelling units credited toward the Above Moderate-Income RHNA. Two of the R-1 sites include an area that was proposed for the Montecito Memorial Park Expansion area. This site was previously slated to accommodate the expansion of Montecito Memorial Park and would have required a general plan amendment and zone change from residential to open space. However, the City declined the expansion project and has decided to maintain this area for residential uses.
- Thirty-five High-Density Residential (R-3) vacant sites totaling just over 29 acres with a capacity of 288 units. These are all credited towards the Moderate-Income RHNA. Of these, 19 sites are between 0.5 and 10 acres in size with a total capacity of 252 units. The other 16 vacant R-3 sites are less than 0.5 acres in size with a total capacity of 36 units.
- There is one Very High Density Residential (R-4) site totaling approximately 0.5 acres with a capacity of eight dwelling units credited toward the Low-Income RHNA.
- The site in Special Planning Area G, south of City Hall, is designated for development for senior housing at 25 dwelling units per acre on half the site and Moderate Density (R-2) at nine dwelling units per acre on the other half. This gives a capacity of approximately 225 units of senior housing, which is conservatively credited to the Moderate-Income RHNA, and 110 units of market-rate housing credited at the Above Moderate-Income level.
- There are five undeveloped sites within The Groves Specific Plan. Four of these sites are designated for mixed-use development with a combination of commercial and residential uses at a minimum density of 20 dwelling units per acre. These sites have a capacity of 307 units in the Lower-Income category. Given the required minimum density, these units are credited to the Extremely Low-/Low-Income category. The other undeveloped site is designated for medium

² SCAG estimates an affordability breakdown of ADUs in the San Bernardino/Riverside subregion as follows: 15% extremely low-income, 8% very low-income, 35% low-income, 35% moderate-income, and 8% above moderate-income. 6th Cycle Housing Element Update Technical Assistance – ADU Affordability Analysis, August 27, 2020.

density residential at up to nine units per acre. These units have been assigned to the Above Moderate-Income category. The Groves Specific Plan has a total available capacity of 563 units.

The underutilized sites inventory includes:

- Six R-1 sites totaling almost 15 acres with a capacity of 41 units credited toward the Above Moderate-Income RHNA.
- One HR-RE site totaling almost 25 acres with a capacity of 24 additional dwellings credited a Above Moderate-Income.
- Thirty-three R-3 sites totaling approximately 30 acres with a capacity of 288 units credited toward the Moderate-Income RHNA. Nineteen of these sites are between 0.5 and 10 acres in size, with an overall capacity of 249 units. Fourteen sites are less than 0.5 acres in size with a capacity of 39 units.

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- Special Planning Area B is an underdeveloped area with a capacity of 499 units; 416 units were credited to the Extremely Low-/Very Low-Income category and 83 as Moderate-Income category in the 2014 Housing Element. Area B includes 15 parcels: four vacant and 11 improved with various types of housing. The Housing Element calls for mixed-use development in Area B, including residential (including senior housing), commercial, institutional, and educational. Residential densities are to be high or very high near streets, with medium density towards the eastern part of the site. The area includes one vacant 26.8-acre parcel, a vacant 3.32-acre parcel, and eight parcels smaller than 0.5 acres, of which two are vacant. Given the mix of vacant and developed sites, and since one development concept governs Area B, it was deemed appropriate to consider the whole area as underutilized. Conditions on this site have not changed appreciably since the adoption of the 2014 Element, so all development potential was carried over to the same income categories.

Figure C-1: Planning Area B Site



Note: Special Planning Area B includes a variety of proposed densities. Specific locations/parcels not identified.

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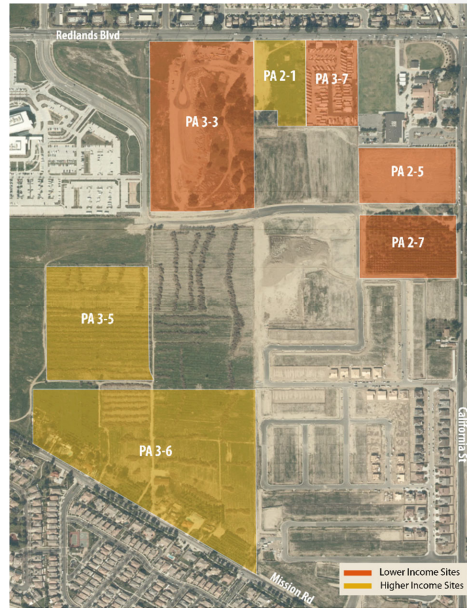
- The Groves Specific Plan includes two underutilized sites. The first, designated Planning Area 3-7 in the Plan, is in the Mixed Use/Very High Density zone with a minimum density of 20 units per acre. This site is improved with a recreational vehicle park and fast-food restaurant. The Specific Plan assigns a capacity of 93 units to the 4.6-acre site. Given the required minimum density, these units are assigned to the Extremely Low-/Low-Income category. The second site, designated Planning Area 3-6, is in the Very Low Density Residential zone, with a maximum density of two units per acre. There are a few existing single-family homes located within the Planning Area. This

site totals 29.3 acres with a capacity of 60 units. These units are assigned to the Above Moderate-Income category.

The appendix lists the sites and provides detailed descriptions of their characteristics. Several of these sites were included in the fifth cycle Housing Element. (The City did not adopt a fourth cycle element; thus, the fifth cycle was prepared to address both previous cycles.) For those vacant and underutilized sites that have not been rezoned to allow at least 20 units per acre (R-3), the City will create an overlay zone that allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Of the 191 sites included in the sites inventory, all but four are either vacant or developed with one to five single-family homes. Of those four sites, three are remnant agricultural parcels and one supports an RV park and fast-food restaurant (and is zoned for mixed-used development within The Groves Specific Plan). Existing uses are not an impediment to residential development for the reasons described below.

Figure C-2: The Groves Specific Plan Sites Formatted: Left



- Within The Groves Specific Plan, properties are controlled by a master developer, and property owners within the plan area have agreed to the gradual transition of uses to the more intense uses allowed by the specific plan.
- The Cottage Street project represents an example of a property owner wishing to replace a duplex with a higher-density project.
- The Veterans' Village project, which yielded 87 units on 4.37 acres, was built on a property containing five single-family units which were torn down to make way for Veterans' Village.
- In Planning Area 3-3 within The Groves, Highpointe Communities plans to remove a discontinued surface mining operation and develop a mixed-use community per the specific plan.
- The cluster of single-family residences along Court Street, Lind Avenue, and Ohio Street form a neighborhood and are all zoned R-3. The houses, many showing signs of deferred maintenance, are interspersed with vacant lots and multifamily housing. The improvement to land value ratios are relatively low, indicating likely underinvestment. Home values in the neighborhood are at the low end of those in other neighborhood cities. At least two adjacent lots are in common ownership, which creates an opportunity for consolidation and creation of a larger lot for redevelopment.
- Conditions similar to those described immediately above apply to the R-3 neighborhood cluster of Juanita Street and Anita Street, pictured below.



Illustration of conditions in Juanita Street/Anita Street neighborhood.

Of the sites designated for the lower-income categories, the analysis reveals that vacant sites will support more than 50 percent of the RHNA for lower-income units.

- The two largest sites, within The Groves Specific Plan, are currently vacant. These sites will yield 125 lower-income units, or 15 percent of the lower-income RHNA.
- A vacant portion of Planning Area 3-3 within The Groves Specific Plan will support 66 lower-income units (eight percent of the lower-income RHNA).
- The site within Special Planning Area B is largely vacant and will yield 390 lower-income units (47 percent of lower-income RHNA).

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City of Loma Linda 2021-2029 Housing Element

- Sites Inventory**
- Pipeline Projects
 - The Groves Specific Plan-Available Sites
 - Approved Projects
 - Underutilized Sites >.5 & <10 ac
 - Vacant Sites >.5 & <10 ac
- Base Map Features**
- Roads
 - Railroads
 - Water Bodies
 - City of Loma Linda Boundary
 - Sphere of Influence

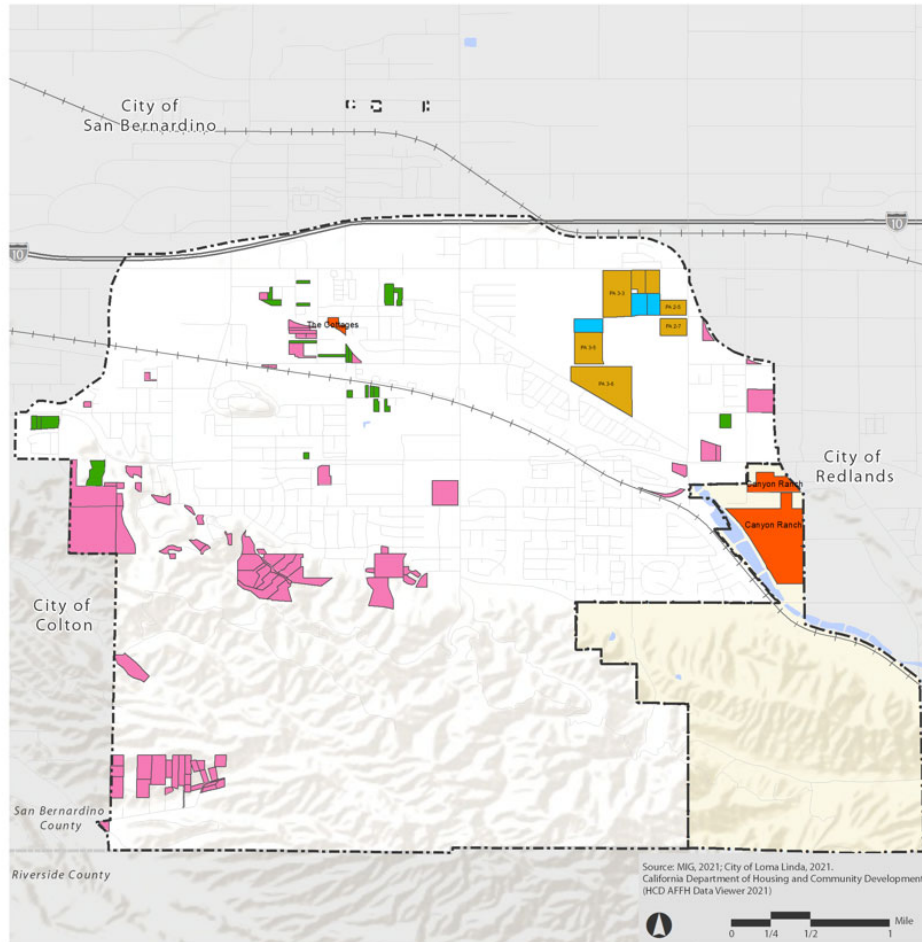


Figure C-3: Sites Inventory Map

No Net Loss Provision

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city must “identify and make available” additional adequate sites to accommodate the jurisdiction’s share of housing need by income level within 180 days of approving the reduced-density project.

The Housing Plan portion of this element includes a program requiring the City to establish a means to track housing production in light of the no-net-loss requirement.

Site Infrastructure and Constraints

The sites inventoried in this Housing Element have residential land use designations and zoning in place which was determined based on surrounding land uses and has already been examined for potential environmental constraints as part of the General Plan Environmental Impact Report. Few additional constraints would impede the development of new housing units in the future on the identified sites. The City requires that project applications for new development be reviewed for adequate infrastructure. Applications are evaluated on a case-by-case basis to ensure there is the capacity to service new developments. Future residential development capacity identified within specific plan areas have infrastructure provision plans in place. State law requires a detailed identification of infrastructure needed to support planned land uses including the methods to be used for infrastructure financing and a program for implementation.

Full urban-level services are available to all the sites in the inventory other than sites zoned HR-C and HR-RE. Specifically, water and sewer service are available or are programmed to be made available for all the sites included in the inventory. Site development potential indicated in the sites inventory is consistent with development capacity reported in the General Plan. Sites in the HR-C and HR-RE zones will be evaluated for municipal services at the time development is proposed. The General Plan EIR accounts for future build-out of the City of Loma Linda. The City of Loma Linda provides water services. The City of San Bernardino provides the wastewater treatment facility. Loma Linda’s RHNA can be accommodated within the existing zoning and General Plan designated parcels in the City and therefore would not create an impact on water services beyond what was identified and analyzed in the General Plan Environmental Impact Report.

Currently the City’s Public Works Department is working on plans for a new 1.6-million-gallon water reservoir to accommodate the new and expected housing this next cycle. The project includes a new 1,500-foot water line extension to serve properties in the hillsides and other vacant properties.

All sites other than those zoned HR-C and HR-RE have access to full dry utilities. As is typically the case for new development, facilities will be installed at the time development proposals are approved in these zones, which are in the hillsides and will support large-lot single-family subdivisions. The city is served by the Southern California Gas Company (natural gas) and Southern California Edison (electricity). Telephone, television, and internet services in the local area are provided by a variety of companies.

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Financial and Administrative Resources

Primary responsibility for implementation of the City's housing programs and activities lies with the City Manager and the Community Development Department, including the Planning and Building Divisions. The primary responsibilities of the Community Development Department include the overall implementation of the City's General Plan Goals and Policies through its programs such as the Zoning and the Subdivision Ordinances, as well as implementing Specific Plans. In addition, the Community Development Department is responsible for the long-range planning and physical development of the City. The department ensures the City's viability through enforcement of land use, construction, health, safety, and environmental regulations.

Several financial resources are available to the City and City residents:

- **Housing Choice Voucher (Section 8) Rental Assistance Program:** The Housing Authority of the County of San Bernardino (HACSB) administers the Housing Choice Voucher Program (formerly the Section 8 Rental Assistance Program) that extends rental subsidies to very low-income households in Loma Linda. The subsidy represents the difference between the excess of 30 percent of the recipient's monthly income and the federally approved fair market rents. In 2019, the HACSB provided rental assistance to 301 households.
- **Public Housing Units:** These units are owned and managed by the Housing Authority of the County of San Bernardino. In 2019, the HACSB owned 42 such units in the City of Loma Linda.
- **Department of Housing and Urban Development (HUD) Grants:** In the 2020-2021 program year, the City of Loma Linda received federal funding for the Community Development Block Grant (CDBG) program through the County of San Bernardino Consortium. Funds were directed at ADA Restroom Improvement at City facilities and ongoing ADA Sidewalk Improvements, homeless services through Inland Temporary Homes (dba Inland Housing Solutions), literacy education through the Loma Linda Branch of the San Bernardino County Library, and meals provided to seniors through Family Services Association.
- **Housing Authority:** With the statewide dissolution of redevelopment agencies in 2012, the City's Housing Authority assumed the responsibilities of winding down any housing programs. The Loma Linda Housing Authority's only income source are loan funds, which amount to about \$200,000 annually. The Housing Authority uses these funds to monitor previously assisted low- and moderate-income housing and to leverage production and rehabilitation efforts of non-profit developers.

The City received funding from the State of California Local Early Action Planning Grant Program (LEAP) for planning activities that accelerate housing production. LEAP provides one-time grant funding to cities and counties to update their planning documents and implement process improvements that will facilitate the acceleration of housing production and help local governments undertake their sixth cycle housing elements.

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Table C-4: Affordable Housing Costs by Household Size and Tenure – 2020

Income Group	Annual Income Limits	Affordable Payment (Per State Guidelines)		Maximum Affordable Price		City of Loma Linda Housing Costs
		Renter	Owner	Home (purchase price)	Rental (per month)	
Extremely Low (0-30% AMI)						
1-Person	\$15,850	\$396	\$396	\$32,943	\$204	
2-Person	\$18,100	\$453	\$453	\$40,322	\$244	
3-Person	\$21,720	\$543	\$543	\$47,280	\$288	
4-Person	\$26,200	\$655	\$655	\$55,608	\$342	
5-Person	\$30,680	\$767	\$767	\$64,990	\$400	
Very Low (30-50% AMI)						
1-Person	\$26,400	\$660	\$660	\$88,551	\$468	
2-Person	\$30,150	\$754	\$754	\$103,836	\$545	
3-Person	\$33,900	\$848	\$848	\$111,479	\$593	
4-Person	\$37,650	\$941	\$941	\$115,959	\$628	
5-Person	\$40,700	\$1,018	\$1,018	\$117,804	\$651	
Low (50-80% AMI)						
1-Person	\$42,200	\$1,055	\$1,055	\$171,831	\$863	
2-Person	\$48,200	\$1,205	\$1,205	\$198,976	\$996	
3-Person	\$54,250	\$1,356	\$1,356	\$218,741	\$1,101	
4-Person	\$60,250	\$1,506	\$1,506	\$235,081	\$1,193	
5-Person	\$65,100	\$1,628	\$1,628	\$246,413	\$1,261	
Moderate Income (80-120% AMI)						
1-Person	\$63,250	\$1,581	\$1,845	\$338,346	\$1,389	Median condominium sales price Dec. 2020: \$298,000
2-Person	\$72,300	\$1,808	\$2,109	\$389,518	\$1,599	Gross Rent estimate: studio/ 1- bedroom: \$1,057-\$1,536 2-bedroom: \$1,304 3-bedroom: \$1,777
3-Person	\$81,300	\$2,033	\$2,371	\$432,739	\$1,778	Median home sales price Dec. 2020: \$405,000

Table C-4: Affordable Housing Costs by Household Size and Tenure – 2020

Income Group	Annual Income Limits	Affordable Payment (Per State Guidelines)		Maximum Affordable Price		City of Loma Linda Housing Costs
		Renter	Owner	Home (purchase price)	Rental (per month)	
4-Person	\$90,350	\$2,259	\$2,635	\$473,105	\$1,946	
5-Person	\$97,600	\$2,440	\$2,847	\$503,456	\$2,073	Gross Rent estimate: 4- and 5-bedroom - \$2,205+

Assumptions: California Department of Housing and Community Development 2020 income limits; 30 - 35% gross household income as affordable housing costs (depending on tenure and income level); 20% of monthly affordable cost for taxes and insurance; 10% down payment, 3% interest rate for a 30-year fixed rate mortgage loan; housing cost include utilities based on Housing Authority of the County of San Bernardino Utility Allowance by room size, 2020.

Sources: California Department of Housing and Community Development, 2020; Housing Authority of the County of San Bernardino, 2020; MIG, 2020. Rent: U.S. Census 2019 ACS 5-Year Estimates Detailed Tables (B25031), Housing Prices: CoreLogic California Home Sale Activity by City, December 2020.

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Appendix D

EVALUATION OF PROGRESS TOWARD IMPLEMENTING THE 2014-2021 HOUSING ELEMENT

This Appendix D analyzes program performance from the 2014-2021 Housing Element programs. State law (California Government Code Section 65588[a]) requires each jurisdiction to review its Housing Element as frequently as appropriate and evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of State housing goals
- The effectiveness of the Housing Element in attaining the community's housing goals and objectives
- Progress in implementing the Housing Element

This evaluation provides information regarding 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 Loma Linda. The evaluation provides the basis for recommended modifications to policies and programs and the establishment of new housing objectives.

Special needs groups require particular attention when developing goals, as these groups have more limited resources to find suitable housing and often look for assistance. As a small city, Loma Linda partners with and relies upon County and non-profit service providers to help provide assistance to special needs groups. During the 2014-2021 planning cycle, the City has focused on increasing housing opportunities for senior households and veterans. The Groves Specific Plan, adopted in 2018, provides for 213 units dedicated for senior housing (market rate). The 87-unit Loma Linda Veterans' Village was completed, providing family and permanent supportive housing for low-income and disabled veterans. The City has advanced discussions with Loma Linda University to incorporate housing into the University's master plans for Special Planning Areas B and C. Also, the City rezoned many properties to "Institutional-Health Care", which includes as allowable uses group homes, residential care facilities, and other assisted living and senior living care facilities—housing that meets the needs of special needs households.

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Table D-1: 2014-2021 Program Accomplishments

2014-2021 Housing Element Program	Progress and Continued Appropriateness
<p>Program 5.1: Adequate Sites Enhance housing opportunities for all, by providing a range of different housing types and unit sizes for varying income ranges and lifestyles.</p>	<p>The City continues to provide appropriate land use designations and maintain an inventory of suitable sites for residential development. In 2018, the City created and adopted The Groves at Loma Linda Specific Plan that designated areas for 1,000 more residential units, ensuring sufficient residential capacity is maintained to accommodate the RHNA needs. The new Specific Plan will allow for low-density and very-high density development at all income levels.</p> <p><i>Continued Appropriateness:</i> The 2021 Housing Element will include an updated adequate sites program that will reflect the new RHNA and sites inventory. A revised version of this program will remain in the Housing Element.</p>
<p>Program 5.2: Housing Opportunities for Special Needs Groups Provide housing opportunity to meet the special housing needs of special needs residents.</p>	<p>The City works with Inland Housing Solutions to help provide homeless families housing. The program offers housing navigation, security deposits, rental assistance, utility deposits, mental health services, life skills classes, and follow-up services. The City has rezoned all institutional zones to “institutional-healthcare” allowing more medical, health, and wellness related uses. In addition, the code lists the allowable uses and requirements for group homes, residential care facilities, and other assisted living and senior living care facilities. Lastly, the Planning Commission has been recommending to developers during the hearing process to provide as much accessible pathways in common areas as possible, such as wider sidewalks and additional elevators.</p> <p><i>Continued Appropriateness:</i> Providing affordable housing opportunities to special needs groups is important to the City and will remain a program in the Housing Element.</p>
<p>Program 5.3: Affordable Housing Development Assist in the provision of adequate housing to meet the needs of the community.</p>	<p>Staff has worked with non-profit developers to develop housing that meets needs of lower-income renters, seniors, veterans, and others, helping to identify available sites and providing technical assistance. City staff provided technical assistance to a housing developer to develop up to six low-income units with preference to veterans at 80 percent AMI; those units will be deeded very low-income for next 45 years. The City also issued the Certificate of Occupancy for the Loma Linda Veterans Village complex which opened in 2019 with 87 units; 36 units are set aside for very low-income veterans up to 50 percent of AMI and 14 units for disabled renters.</p>

Table D-1: 2014-2021 Program Accomplishments

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	<p><i>Continued Appropriateness:</i> Facilitating the production of affordable housing is important to the City and will remain a program in the Housing Element.</p>
<p>Program 5.4: Housing Choice Voucher Program Assist in the provision of adequate housing to meet the needs of the community.</p>	<p>The City works with the County of San Bernardino Housing Authority, which administers housing choice vouchers in the City of Loma Linda, including project-based vouchers for Loma Linda Veterans Village. Currently there are 315 voucher holders in the City. The County has a waiting list of over 47,000 households.</p> <p><i>Continued Appropriateness:</i> The Housing Choice Voucher program is an important affordable housing resource for City residents and will remain in the Housing Element with updated objectives for preservation of vouchers and continued coordination with SBHA.</p>
<p>Program 5.5: Comprehensive Development Code Update Periodically review City regulations, ordinances, permitting processes, and residential fees to ensure that they do not constrain housing development and are consistent with state law.</p>	<p>The City hired consultants in 2014/2015 to undertake a focused update of the City's zoning ordinance to achieve consistency with the General Plan. The updated code, adopted in 2017, allowed for ADUs in compliance with state law; addressed emergency shelters and allowed homeless shelters by-right; defined transitional/supportive housing, and modified development standards to allow higher density. The definition of "family" was also modified, and it explicitly addressed the residential care facilities requirement. No planning entitlements are required for ADU nor are development impact fees collected.</p> <p>In 2020, the City hired consultants to update other portions of the development code to reflect current State laws and clear up the inconsistencies in and conflicts with other chapters of the municipal code. In this effort, the City also updated the General Plan Land Use Element to eliminate confusing language and created a one-map system for zoning and General Plan land use designations. In 2021, the City adopted a new ADU ordinance to reflect current State law. In November 2021, the City adopted objective design standards for multi-family residential projects and mixed-use developments that are at least two-thirds residential.</p>

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Table D-1: 2014-2021 Program Accomplishments

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	<p><i>Continued Appropriateness:</i> Removal of development constraints remains a commitment. This program will remain in modified form to focus on staying up to date with State laws.</p>
<p>Program 5.6: Lot Consolidation and Subdivision Mitigate potential governmental constraints to housing production and affordability.</p>	<p>The City revised development standards for nonconforming smaller lots in the latest code update, which can now build up to 60 percent lot coverage, rather than the typical maximum lot coverage 40 percent for single-family residential zoned lots that are 7,200 sq ft or more. Staff continues to encourage developers to consider multi-family/senior housing in new Specific Plan area (adopted in 2018) and is exploring other opportunities for new housing development.</p> <p><i>Continued Appropriateness:</i> This program objective will remain in the Housing Element either as a stand-alone program or as part of a more comprehensive program addressing new housing development.</p>
<p>Program 5.7: Water and Sewer Service Providers Deliver to all public agencies or private entities that provide water or sewer services to properties within the City of Loma Linda a copy of the 2014-2021 Housing Element.</p>	<p>The City submitted the adopted Housing Element to water and sewer providers within city limits consistent with the requirements of State law.</p> <p><i>Continued Appropriateness:</i> This remains a requirement of Housing Element law and will remain in the updated Housing Element.</p>
<p>Program 5.8: Code Enforcement Maintain and improve the quality of existing housing and residential neighborhoods in Loma Linda.</p>	<p>Through the Code Enforcement Department, the City has been able to encourage the maintenance, enhancement, and rehabilitation of the existing housing stock, as well as improve overall housing conditions in Loma Linda. Building and Fire officials also provide inspection services on a complaint, as-needed basis. Through the implementation of the online complaint form, staff is better able to document the complaints and address them in a more timely manner.</p> <p>The City receives very few code enforcement complaints, with the majority of them related to overgrown vegetation.</p> <p><i>Continued Appropriateness:</i> Property maintenance helps maintain the housing stock and preserve affordable housing. This program will remain in the Housing Element with quantifiable objectives consistent with available funding.</p>

Table D-1: 2014-2021 Program Accomplishments

2014-2021 Housing Element Program	Progress and Continued Appropriateness
<p>Program 5.9: Housing Rehabilitation Program Maintain and improve the quality of existing housing and residential neighborhoods in Loma Linda.</p>	<p>The City’s Housing Rehabilitation Program was active up until the elimination of the redevelopment agency, as it relied solely on redevelopment funds. No other funding sources are now available. Code enforcement and other departments help with the maintenance, enhancement, and rehabilitation of the existing housing stock using General Fund resources.</p> <p><i>Continued Appropriateness:</i> Programs 5.8 and 5.9 will be combined to address housing preservation and to define potential supplemental funding sources.</p>
<p>Program 5.10: Housing At-Risk of Conversion to Market Rate Housing Maintain and improve the quality of existing housing and residential neighborhoods in Loma Linda.</p>	<p>Based on City records, between 2014-2021, no assisted housing developments in Loma Linda have been at risk of losing their affordability status. Instead, the City has gained more affordable units. During the 2021-2029 cycle, two assisted housing developments have been identified to be at risk, with 30-year covenants expiring in 2029 and 2030. Staff will continue to monitor the status of existing and future affordable housing. Should any property become at risk of converting to market rate, the City will work with owner, interested groups, and state or federal agencies to help conserve the affordable housing stock.</p> <p><i>Continued Appropriateness:</i> This program provides the impetus to find ways to extend covenants. An updated version of this program will be included in the Housing Element and will include details based on an updated at-risk analysis.</p>
<p>Program 5.11: Fair Housing Promote equal housing opportunity for all residents.</p>	<p>The City of Loma Linda takes affirmative steps to promote fair housing practices by contracting with the Inland Fair Housing and Mediation Board to provide fair housing services for City residents and housing professionals. The City advertises fair housing services through flyers at public counters and City mailers, on the City website and at other community locations. In addition, the City works with other housing agencies such as the San Bernardino County Housing Authority to help post and share information.</p> <p><i>Continued Appropriateness:</i> Fair housing practices are critical to ensuring equal opportunities for all residents. An expanded version of the program will remain in the Housing Element consistent with</p>

Table D-1: 2014-2021 Program Accomplishments

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	new State laws requiring cities to Affirmatively Further Fair Housing (AB 686, 2018).
<p>Program 5.12: Reasonable Accommodation Promote equal housing opportunity for all residents.</p>	<p>City staff understands the importance of providing reasonable accommodation to further housing opportunities for people with disabilities and considers requests for accommodation when determined to be reasonable based on fair housing laws. There are minor deviation applications, variance request forms, director allowances, and other similar procedures that help create a process for making requests for reasonable accommodations to land use and zoning decisions regulating the siting, development, and use of housing for people with disabilities and other specific needs.</p> <p><i>Continued Appropriateness:</i> This program will be modified to more explicitly define the reasonable accommodation process as a ministerial process.</p>

Appendix E

AFFIRMATIVELY FURTHERING FAIR HOUSING

Introduction

In January 2017, California Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH). AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The law added a requirement for an assessment of fair housing in the Housing Element to include the following components: 1) a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity, 2) an analysis of segregation patterns and disparities in access to opportunities, 3) an assessment of contributing factors, and 4) an identification of fair housing goals and actions. For Loma Linda, the primary data sources for the AFFH analysis are the County of San Bernardino 2020-2025 Analysis of Impediments to Fair Housing Choice (AI) and the State of California Department of Housing and Community Development (HCD) AFFH Data Viewer.

Fair Housing Assessment

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor.

Fair Housing Enforcement and Capacity

The County of San Bernardino 2020 – 2025 AI serves as the fair housing planning document for the County of San Bernardino. San Bernardino County receives annual funding allocations from the United States Department of Housing and Urban Development’s (HUD) Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Programs. As a condition of receiving these funds, the County is required to complete an AI. The AI covers the unincorporated areas of the County, as well as the municipalities that participate in San Bernardino County’s CDBG program, such as Loma Linda (as well as Adelanto, Barstow, Big Bear Lake, Colton, Grand Terrace, Highland, Montclair, Needles, Redlands, Twentynine Palms, Yucaipa, and Yucca Valley). The purpose of the AI is to identify impediments to fair and equal housing opportunities in San Bernardino County. The AI provides an overview of the laws, regulations, conditions, or other possible obstacles that may affect access to housing and other services in the County.

Loma Linda residents have access to the Inland Fair Housing and Mediation Board (IFHMB), which serves San Bernardino County in providing fair housing education, outreach, and enforcement services. The IFHMB:

- Assists persons believed to have been harmed by discriminatory housing practices
- Helps people identify government agencies that handle complaints of housing discrimination
- Conducts preliminary investigation of claims
- Carries out testing and enforcement activities to prevent or eliminate discriminatory housing practices
- Educates the public and housing providers about equal opportunity in housing and compliance with fair housing laws.

HUD's Regional Office of Housing and Equal Opportunity and the State of California Department of Fair Employment and Housing also investigate fair housing violations and allegations of discrimination based on a person's status as a member of one of the State or federally protected categories. The following summarizes housing discrimination complaints filed with these organizations between 2014 and 2019.

Complaints Filed with IFHMB

IFHMB reported receiving 680 housing discrimination complaints in San Bernardino County, with a majority (70 percent) alleging disability as the basis of discrimination, followed by race with 12 percent of cases. No information was available regarding the outcome of complaints received, whether conciliated or referred to an enforcement agency. The City does not maintain records regarding the number or type of referrals, as staffing and other resources are constrained. The IFHMB has not been able to provide information to the City regarding the number of complaints originating from Loma Linda residents. The Housing Plan section of this Housing Element includes Program 5.1 regarding education of residents and landlords regarding fair housing laws.

Complaints Filed with HUD

HUD's regional office reported it had received a total of 198 formal complaints of alleged housing discrimination occurring within the jurisdiction of San Bernardino County: 26 originating from the City of San Bernardino, 19 from Ontario, 18 from Fontana, 17 from Upland, 14 Ranch Cucamonga, 12 Victorville, 11 from Rialto, 10 from Hesperia, and other jurisdictions and communities in the County responsible for fewer than 10 complaints each over the five-year period (such as Loma Linda). In 2019, 168 cases had been closed and 30 were open and pending. A majority of the closed cases (110) were closed after investigation and a no-cause determination. Disability was the most often cited basis of discrimination, alleged in 53 percent of the 198 cases reported. Race was the second most alleged basis of discrimination (21 percent).

Complaints Filed with the California Department of Fair Employment and Housing (DFEH)

DFEH reported receiving, processing, and closing 169 complaints of housing discrimination originating in San Bernardino County. Disability was again the most often cited basis of discrimination, alleged in 53 percent of the 169 cases reported. Race was again the second most alleged basis of discrimination (22 percent of cases).

Local Data

HCD’s AFFH Data Viewer provides additional information on local fair housing enforcement and outreach. Fair housing inquiries data from HUD indicates that from 2013 to 2021, 11 inquiries originated from Loma Linda residents, or 0.46 inquiries per 1,000 residents. The basis for the complaints is only available for two of the inquiries: disability and race. Compared with surrounding jurisdictions, the number of inquiries per 1,000 residents was lower than the in C

city of San Bernardino (0.55 inquiries per thousand residents), similar to the level of inquiries seen in the cities of Colton and Rialto, and higher than the level of inquiries in Grand Terrace, Redlands, and Highland.

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Fair Housing Lawsuits and Litigation

In April 2017, a lawsuit was filed against Loma Linda Heritage Associates by the United African-Asian Abilities Club. The suit alleged that Loma Linda Heritage apartment complexes violated fair housing and American with Disabilities Act (ADA) laws for failure to meet accessibility standards and architectural barriers, and failure to make reasonable modifications or accommodations for persons with disabilities to use and enjoy or have equal access to dwellings and facilities. The case was dismissed a few months later after a confidential settlement was reached.

Segregation and Opportunity Patterns and Trends

The AFFH analysis must address areas of ongoing and concentrated segregation and integration and compare concentrations of protected characteristics and incomes. The following information discusses the levels of segregation and integration for race and ethnicity, income, familial status, persons with disabilities.

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Race/Ethnicity

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. White (non-Hispanic) and Hispanic residents make up most of the City’s population. Compared with the County of San Bernardino, the City has about half the proportion of Hispanic and three times the proportion of Asians/Pacific Islanders. As shown in Table E-1, since 2010, both the proportion and number of White residents have decreased while the proportion and number of Black residents have doubled. This is indicative of the City becoming more diverse.

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Table E-1: Race and Ethnicity

Demographic Profile	2010		2019	
	Number	Percentage	Number	Percentage
White (non-Hispanic)	9,384	41%	7,822	32%
Hispanic	6,204	27%	6,821	28%
Black	1,078	5%	2,345	10%
Asian/Pacific Islander	5,823	25%	6,275	26%
Other	348	2%	921	4%

Sources: American Community Survey 2006-2010 & 2015-2019 5-year estimate

Figure E-1 shows the distribution of non-white residents in Loma Linda. Most of the City block groups show a population that is between 60 and 80 percent non-white. Within the City there are no concentrations of non-white population, although two block groups located southwest of the Barton Road and Mountain View Avenue intersection show a lower proportion of non-white population. Compared with the surrounding area, the City of Loma Linda has a similar demographic makeup to cities to the east but has a lower proportion of non-white residents compared to cities to the west. The AFFH Data Viewer provides a measurement of the predominant racial/ethnic group for each census tract and the extent of the group's prominence. This is measured as predominant (> 50 percent), sizeable (10-50 percent), and slim (< 10 percent). Most of the City shows a White majority, however, the dominance values are quite low and range between 0.14 and 13.93. There is one Census tract with a slim Hispanic majority (7.44) south of Redlands Boulevard between Anderson Street and Mountain View Avenue. This Census tract also correlates with slightly lower income, higher proportion of renters, and higher CalEnviroScreen results,

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According to HUD, "The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups." Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. The dissimilarity index compares a particular racial group's distribution in the county against the distribution of White, non-Hispanic residents.

Table E-2 summarizes the dissimilarity indices of different racial groups in San Bernardino County. The table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The "current" figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and as a result, often indicate slightly higher levels of segregation than census tracts. The AI provides a

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discussion of segregation at the census tract-level from 1990 through 2010 and then examines the “current” figures calculated using block groups.

Table E-2: Racial/Ethnic Dissimilarity Trends San Bernardino County and Region

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Racial/Ethnic Dissimilarity Index	San Bernardino County				Riverside-San Bernardino-Ontario Region			
	Census Tract Level			Current (2010)	Census Tract Level			Current (2010)
	1990 Trend	2000 Trend	2010 Trend		1990 Trend	2000 Trend	2010 Trend	
Non-White/White	36.4	43.3	46.1	48.6	32.9	38.9	39.0	41.3
Black/White	45.2	47.6	50.0	54.0	43.7	45.5	44.0	47.7
Hispanic/White	39.9	47.8	49.8	51.1	35.6	42.4	42.4	44.0
Asian or Pacific Islander/White	38.3	41.2	41.3	48.0	33.2	37.3	38.3	43.1

Black residents have had the highest dissimilarity index values since 1990 among all racial groups. This segregation has increased slightly since then and is considered a moderate level. Hispanic residents experience the second highest levels of segregation and are similar to those of Black residents in 2010. Hispanic residents saw the greatest change in segregation levels between 1990 and 2010, with the dissimilarity index value increasing by nearly 10 points. Asian or Pacific Islander residents have had lower levels of segregation since 1990 but have increased slightly since then. **In comparison to the region, the County has slightly higher levels of segregation; however, segregation has also been increasing in the region since 1990.**

The “current” dissimilarity index values for the County are higher than the values calculated at the census tract level in 2010. However, values for all racial groups remain in moderate levels of segregation. Similar to census tract level values, current dissimilarity index values for all pairings are lower in the region than in San Bernardino County.

To assist in this analysis of integration and segregation, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) created Opportunity Maps to identify resources levels across the state. These opportunity maps are made from composite scores of three different domains (economic, environmental, and education) made up of a set of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation (Census tracts with at least 30 percent of the population under the federal poverty line and a location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County). According to the California Fair Housing Task Force’s 2021 opportunity maps, there is one census tract or area of high racial segregation and poverty in Loma Linda. This tract is located in the northwestern-most corner of the City. This tract covers a portion of the City of Colton, so it is likely also picking up data from that city. Regionally, areas with high segregation and poverty are largely located in the City of San Bernardino, Adelanto, Victorville, and Barstow (HCD AFFH Data Viewer).

Persons with Disabilities

Disabled residents face housing access and safety challenges. Disabled people, in most cases, are of limited incomes and often receive Social Security income only. As such, much of their monthly income is often devoted to housing costs. In addition, disabled persons may face difficulty finding accessible housing because of the limited number of such units. In 2019, 3,301 residents in Loma Linda lived with a disability, representing 13.8 percent of City residents. Most residents with a disability are 75 years and over (53.7 percent), followed by those 65 to 74 years of age (34 percent). The most prevalent disability types among disabled Loma Linda residents are ambulatory and independent living disabilities, which combined make up almost half of the disabilities tallied.

Figure E-2 shows the population of persons with a disability by census tract in the City using American Community Survey (ACS) data from 2015-2019. At a regional level, Loma Linda is similar to the rest of the county in that almost all of the census tracts have less than 20 percent of their population living with a disability. However, the map reveals a lower concentration of residents with disabilities in three areas of the City: north of Barton Road in the area where Loma Linda University is located (as well as the areas just north and west of it), northeast of the Mountain View Avenue and Redlands Boulevard intersection, and northeast of the California Street and Barton Road intersection.

Familial Status

Single-parent households require special consideration and assistance because of the greater need for day care, health care, and other services. In particular, female-headed households with children tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services. Loma Linda has 1,119 female-headed family households, representing 15.2 percent of households. Household type and income are closely linked. In Loma Linda in 2019, 15.2 percent of female-headed households live below the poverty level compared to nine percent of married or couple families.

Figure E-3 shows the percent of children in married-couple households in the region and the percent of children in female-headed households (no spouse/partner) using ACS data from 2015-2019. Loma Linda has a concentration of children living in married couple households (more than 80 percent) in most parts of the city, except for the area surrounding Loma Linda University and Medical Center, as well as the areas just north and west of these institutions. A concentration of children living in female-headed households (no spouse/partner) occurs near the university (Figure E-4). Compared to the region, Loma Linda has similar proportions of female-headed households to cities in eastern San Bernardino County, such as Redlands, Yucaipa, and Highland and less than that of the City of San Bernardino. The proportion of married-couple households in Loma Linda most closely resembles Redlands and generally has slightly higher proportions of these households than most cities in the County.

Income Level

According to the 2019 ACS, the median household income for Loma Linda was \$55,607, which is lower than the County of San Bernardino median household income of \$67,903. Median household income differs by tenure; owner households earn almost twice what renter households make. Census data indicate that 16.8 percent of residents live in poverty, as defined by federal guidelines. This proportion is

Moved up [1]: Figure E-1 shows the distribution of non-white residents in Loma Linda. Most of the City block groups show a population that is between 60 and 80 percent non-white. Within the City there are no concentrations of non-white population, although two block groups located southwest of the Barton Road and Mountain View Avenue intersection show a lower proportion of non-white population. Compared with the surrounding area, the City of Loma Linda has a similar demographic makeup than cities to the east but has a lower proportion on non-white residents compared to cities to the west. ¶

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slightly higher than the County of San Bernardino where 16 percent of residents live in poverty. Figure E-5 shows that in Loma Linda, the neighborhood southeast of the Barton Road and Mountain View Avenue intersection has the highest median income, while the northwest areas of the City have the lowest median income. This may reflect a higher student population around the university. These areas generally coincide with a concentration of residents living in poverty, as shown in Figure E-5.

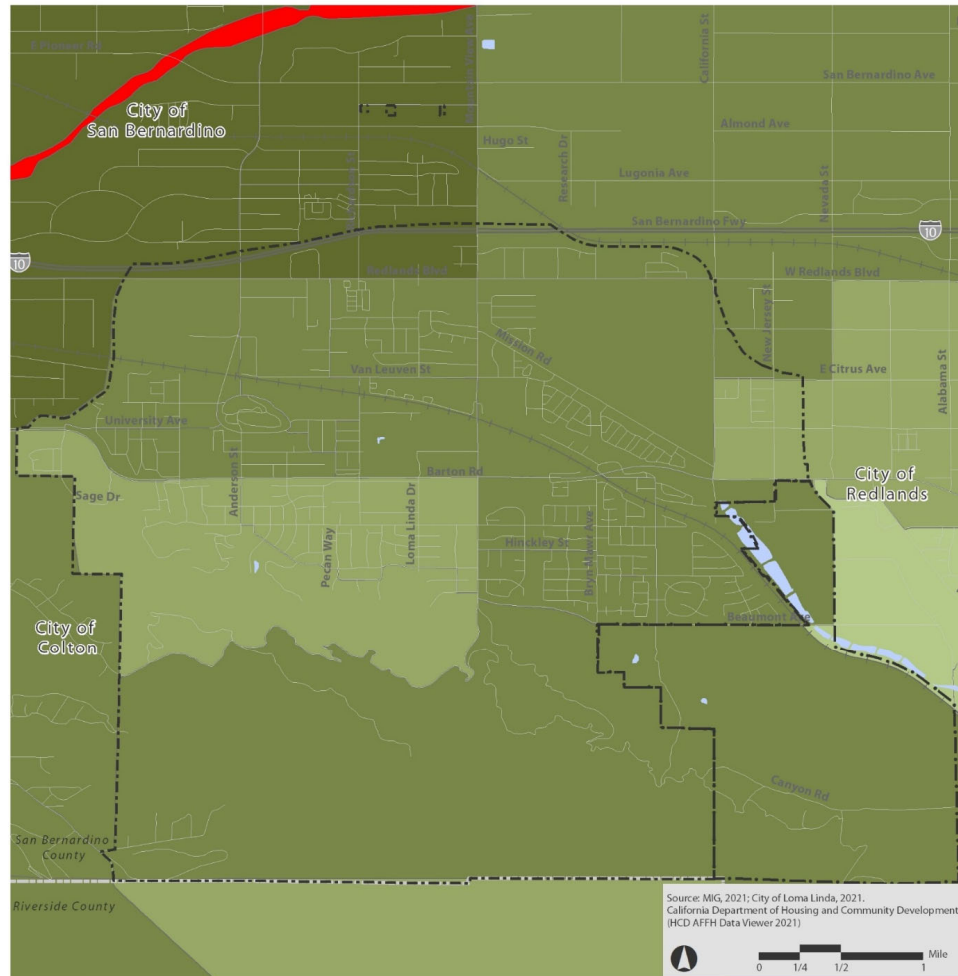
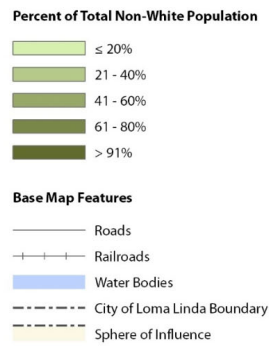
Identifying low or moderate-income (LMI) geographic areas and individuals is important to overcome patterns of segregation. HUD defines an LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Figure E-6 shows the LMI areas in Loma Linda by Census block group. At the County level, the latest iteration of this data from the 2011-2015 American Community Survey (ACS) shows 894,868 low- and moderate-income residents in San Bernardino County against a population of 2,043,425. This yields a low- and moderate-income percentage of 43.79 percent countywide. In other words, 43.79 percent of people living in San Bernardino County are members of households earning less than 80 percent of Area Median Income. Though significant, this percentage is similar to the broader geographical region. Neighboring Orange County's percentage was 49.26; Los Angeles, 56.03; and San Diego, 47.70. Many areas in central San Bernardino County have high proportions of LMI areas, particularly in the City of San Bernardino, Adelanto, Victorville, and Barstow. Loma Linda has a similar low- and moderate-income percentage of 42.6 percent. Within the City, LMI areas are mostly around the university in the northwest areas of the City.

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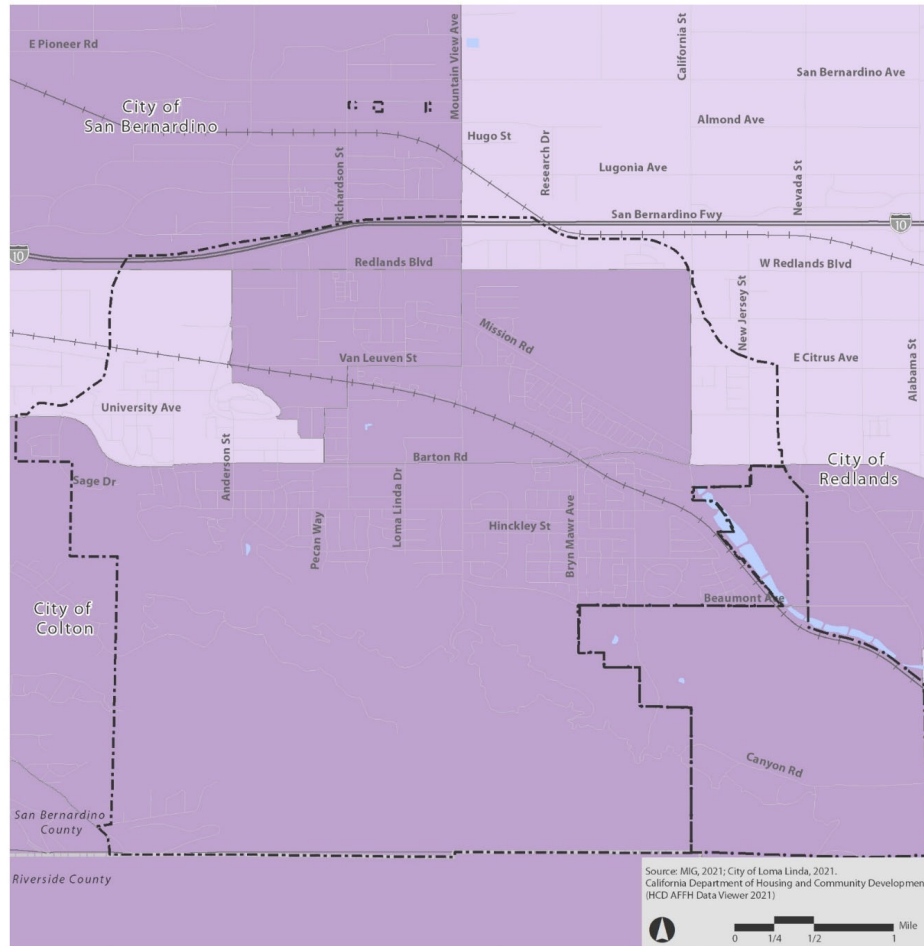
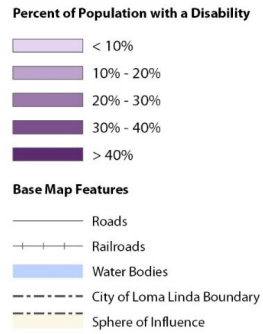
City of Loma Linda 2021-2029 Housing Element

**Figure E-1:
Racial Demographics
2018 Block Group**



City of Loma Linda 2021-2029 Housing Element

**Figure E-2:
Population with Disability
(ACS, 2015-2019)**



City of Loma Linda 2021-2029 Housing Element

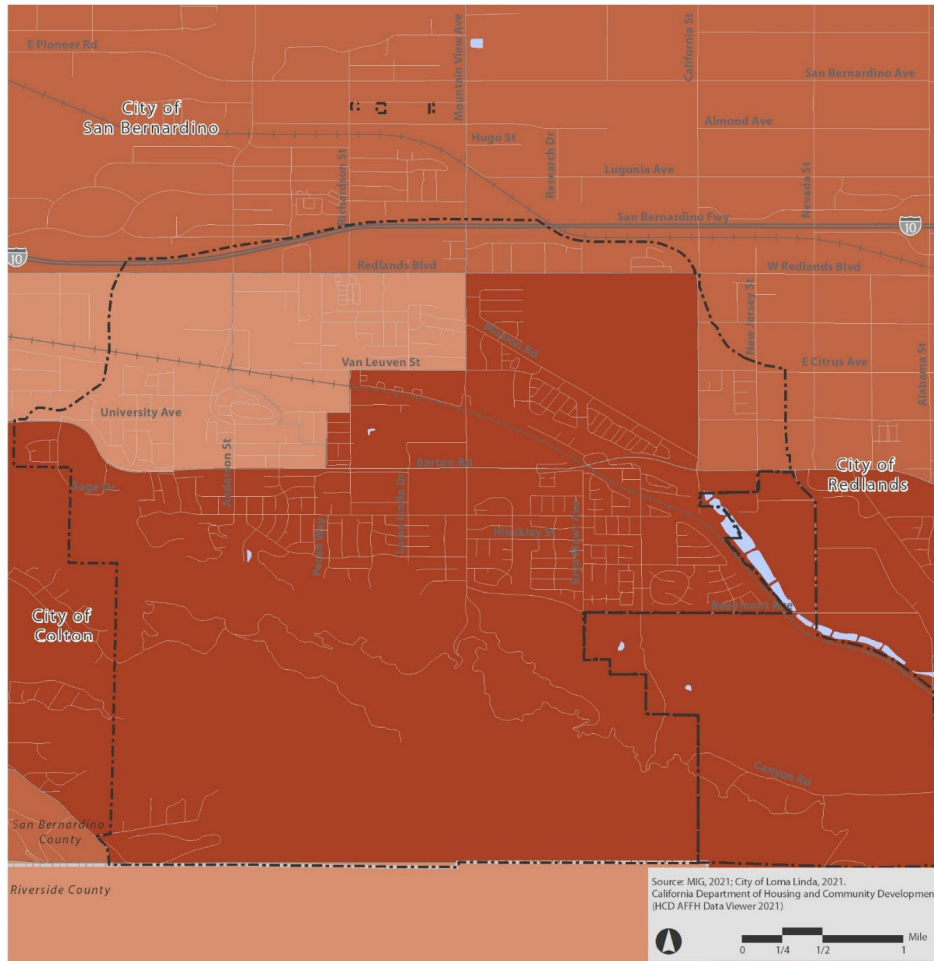
**Figure E-3:
Percent of Children in
Married-Couple Households
(ACS, 2015-2019) - Tract**

Percent of Children in Married-Couple Households

- < 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 80%

Base Map Features

- Roads
- Railroads
- Water Bodies
- City of Loma Linda Boundary
- Sphere of Influence



City of Loma Linda
2021-2029
Housing Element

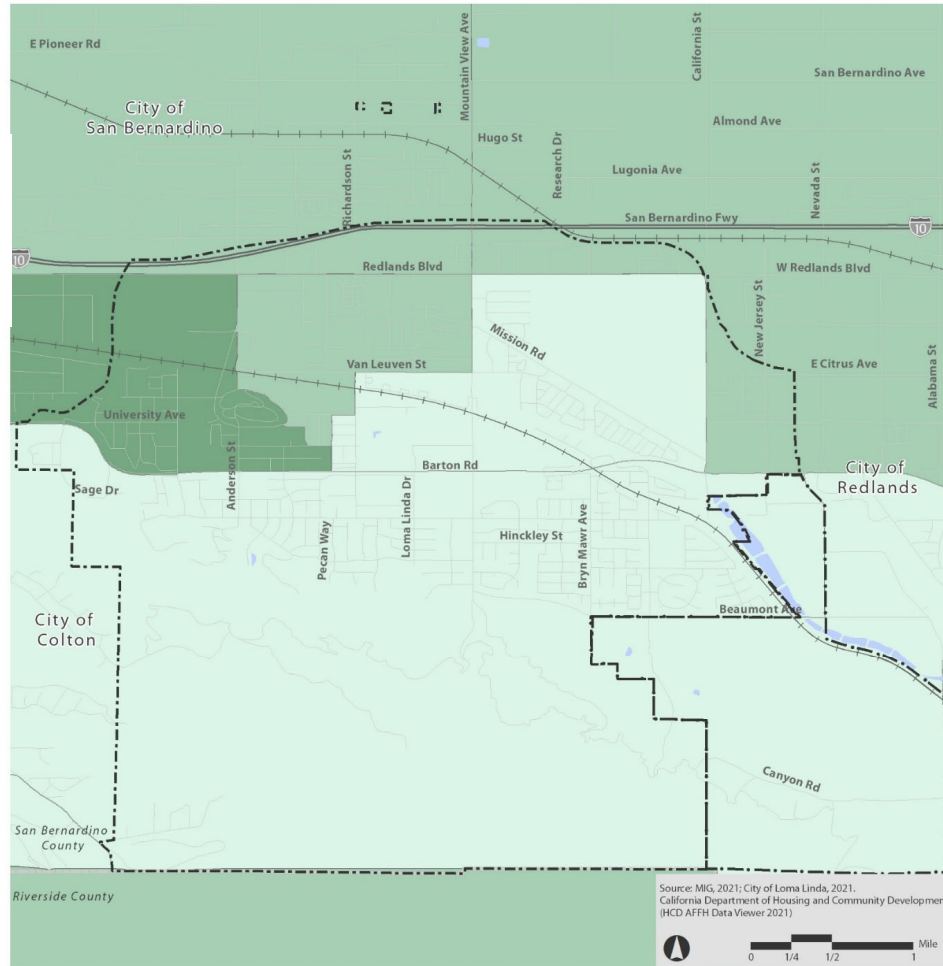
Figure E-4:
Percent of Children in
Female-Headed Households
(No Spouse/Partner)
(ACS, 2015-2019) - Tract

Percent of Children in Female-Headed Households (No Spouse/Partner)

- < 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 80%

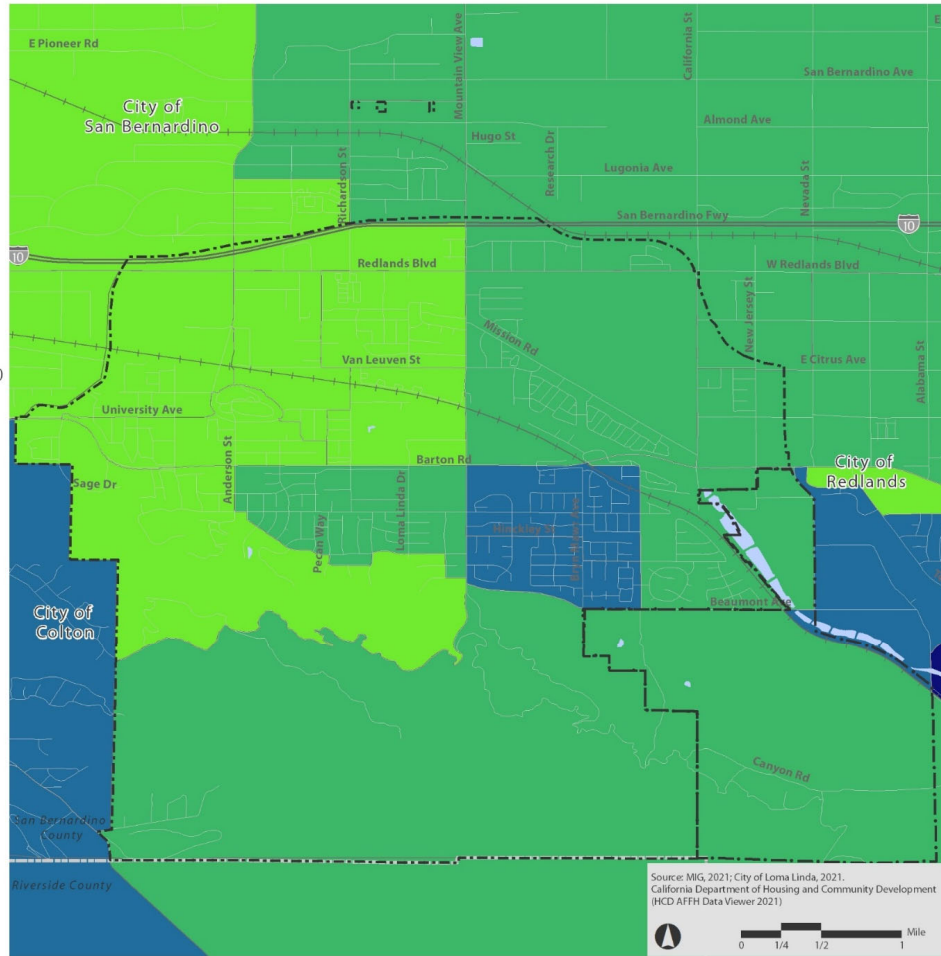
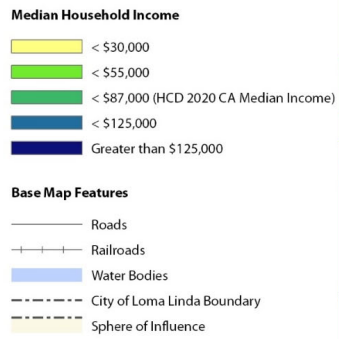
Base Map Features

- Roads
- Railroads
- Water Bodies
- City of Loma Linda Boundary
- Sphere of Influence



City of Loma Linda 2021-2029

**Figure E-5:
Median Income
(ACS, 2015-2019) – Block
Group**



Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)

Racially or ethnically concentrated areas of poverty (R/ECAPs) are census tracts with relatively high concentrations of non-white residents with these residents living in poverty. An area is designated a R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the census tract population. Second, the poverty rate in that tract must exceed a certain of either 40 percent or three times the overall poverty rate for the County, whichever is lower.

Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. R/ECAPS are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity. According to HUD, Loma Linda has no census tracts that qualify as R/ECAPs, which is confirmed by data in the HCD AFFH Data Viewer. Regionally, there are R/ECAPs located in the City of San Bernardino’s downtown area, around UC Riverside, and northwest of Grand Terrace. While Loma Linda has no R/ECAPs, concentrated areas of poverty that correspond within areas of high diversity occur around the university. As mentioned earlier, Hispanics have a prominence value of 7.44 percent in one Census tract northwest of the City. This area coincides with LMI areas and renters.

Racially Concentrated Areas of Affluence

Racially or Ethnically Concentrated Areas of Affluence (RCAAs) are generally understood to be neighborhoods with both high concentrations of non-Hispanic White households and high household income rates. As mentioned previously, much of Loma Linda has a White majority with a prominence value between 0.14 and 13.93, which is considered slim to sizeable. In Loma Linda, two block groups with higher-income households exist in the neighborhood southeast of Barton Road and Mountain View Avenue and do overlap with a Census tract with a prominence value of 13.93 for White (non-Hispanic) residents. However, this Census tract is quite large and covers parts of Colton and Redlands.

Compared with San Bernardino County, the City has a similar racial demographic makeup to cities in eastern San Bernardino. These cities also tend to have higher median incomes. Cities in central and western San Bernardino County tend to have higher concentrations of Hispanic residents and lower incomes.

Opportunity Access

Barriers exist beyond fair housing issues that can limit access to opportunities in education, employment, transportation, low poverty environments, and environmentally healthy neighborhoods. To facilitate the access to opportunity analysis, HUD provides a table titled “Opportunity Indicators by Race/Ethnicity” (Table E-2) that measures access to opportunity by seven indices for jurisdictions receiving direct HUD funds. The indices allow comparison of opportunity indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and to the region. With these indices, a higher number is correlated to a better outcome. Each index should not be thought of as a percentage but as an “opportunity score.”

Since the County of San Bernardino is the recipient of HUD funds, a county-level data table is available from HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) for each index by race

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and ethnicity and is shown in Table E-3. The AFFH-T also provides a map with Census tract and block-level data and was used to extrapolate city-level data for Loma Linda. The map provides index scores for each census tract or block group, but not by race and ethnicity. An average was taken from all local census tracts to get an overall score for each of the indices.

- **The environmental health index** summarizes potential exposure to harmful toxins at a neighborhood level and is based on the U.S. Environmental Protection Agency's (EPA) estimates of air quality (carcinogenic, respiratory, and neurological toxins). The higher the value, the better the environmental/air quality of a neighborhood. The County generally scores higher across all racial and ethnic groups than the region. However, Hispanic and Asian residents in the County experience the greatest exposure to poor environmental/air quality. White and Native American populations experience the highest environmental/air quality levels, although scores are lower for Native Americans living below the poverty level. The City of Loma Linda has an overall score of 34, which is lower than all the racial and economic groups in the County and region, meaning residents of Loma Linda experience poor levels of environmental/air quality.
- **The low poverty index** captures poverty in a neighborhood or jurisdiction. The higher the score, the lower the area's exposure to poverty. The County has moderate levels of exposure to poverty and some disparities exist among racial and ethnic groups. Asian and White residents are exposed to the lowest levels of poverty, whereas Hispanic and Native American residents below the poverty line experience the greatest exposure to poverty. In comparison to the region, the County scores lower. Loma Linda has a low poverty index score of 44, similar to that of the County.
- **The school proficiency index** uses test scores from fourth-grade students to determine whether neighborhoods have high-performing or low-performing elementary schools. The higher the score, the higher the quality of elementary schools in the area. The school proficiency index score for the County indicates some disparity in access to proficient schools among racial and ethnic groups. Hispanic and Black residents have the least access to proficient schools, while White and Asian residents have the best access. Black, Hispanic, and Native American residents have disproportionately less access to proficient schools relative to White residents and are especially low for those living below the poverty level. Compared to the County, Loma Linda generally has a similar score of 46.
- **The labor market index** presents the general strength of human capital and labor market engagement in each area. The higher the score, the higher labor market engagement. Asian and White residents experience the highest levels of labor market engagement in the County, whereas Hispanic, Native American, and Black residents experience the lowest. Those living below the poverty line have significantly lower levels of labor market engagement. Loma Linda has an overall score of 54, which is higher than that of the County and somewhat similar to that of the region, indicating that residents have moderate access to jobs.
- **The transit index** is based on estimates of transit trips taken by a family. The higher the score, the more likely residents are to utilize public transportation. Transit usage is generally low and relatively uniform throughout the County. The highest usage occurs in the southwestern portion of the County. The transit index score indicates some differences in levels of transit usage among racial and ethnic groups. Asian, Hispanic, and Black residents have the highest levels of transit

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usage. In comparison to those below the poverty line, transit use increases slightly for most groups. In the region, transit usage is generally higher and there are fewer disparities among racial and ethnic groups. In Loma Linda, the transit index score is 51, which is higher than the County and region. The City is located in the part of the County where transit usage is generally the highest. The regional transit bus agency, Omnitrans, operates a rapid bus line in Loma Linda to serve the university and medical center.

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- **The low transportation cost index** is based on estimates of transportation expenses for a family. The higher the score, the lower the transportation cost for an area. Low transportation cost index scores are low and relatively uniform throughout the County. Similar to the transit trip index, Asian, Black, and Hispanic residents have greater access to low-cost transportation. Loma Linda has a score of 51, indicating that similar to the transit index, residents have better access to more affordable transportation options.
- **The job proximity index** quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within the region, with larger employment centers weighted more heavily. The higher the score, the better access to employment opportunities is for a given area. In the County, job proximity scores are similar across all racial and ethnic groups, but labor market engagement scores are low for Black, Hispanic, and Native American residents indicating there are likely other factors prohibiting access to jobs than just proximity. Loma Linda has a score of 61, indicating better proximity to jobs than that of the County and the region.

Table E-3 - Opportunity Indicators by Race/Ethnicity

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(San Bernardino County, CA CDBG, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	45.07	49.38	30.97	31.42	22.57	49.24	69.18
Black, Non-Hispanic	33.46	35.10	21.87	41.18	32.28	50.98	53.81
Hispanic	32.72	35.29	21.47	40.95	32.25	49.37	46.33
Asian or Pacific Islander, Non-Hispanic	49.75	47.81	39.93	42.03	35.19	51.06	48.19
Native American, Non-Hispanic	33.23	39.10	21.36	30.10	22.24	54.23	68.75
Population below federal poverty line							
White, Non-Hispanic	33.88	44.22	22.53	30.87	23.50	48.14	71.08
Black, Non-Hispanic	26.40	28.18	15.31	40.45	31.19	49.36	56.29
Hispanic	24.03	31.82	16.00	41.85	34.69	51.21	46.32

Table E-3 - Opportunity Indicators by Race/Ethnicity

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(San Bernardino County, CA CDBG, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Asian or Pacific Islander, Non-Hispanic	32.53	35.89	26.76	44.04	40.10	56.54	47.20
Native American, Non-Hispanic	24.80	25.47	18.76	34.10	30.59	58.09	54.61
(Riverside-San Bernardino-Ontario, CA) Region							
Total Population							
White, Non-Hispanic	52.61	50.65	34.50	37.96	25.75	49.50	55.48
Black, Non-Hispanic	42.80	41.50	27.18	42.55	31.82	49.72	44.22
Hispanic	37.51	37.99	24.20	43.12	32.68	47.81	42.38
Asian or Pacific Islander, Non-Hispanic	60.42	56.42	43.02	41.92	29.18	48.25	42.29
Native American, Non-Hispanic	41.19	40.74	25.06	36.84	26.34	50.16	56.24
Population below federal poverty line							
White, Non-Hispanic	38.39	42.36	25.55	38.74	29.20	49.95	56.84
Black, Non-Hispanic	27.15	30.84	17.39	43.48	34.78	48.95	44.86
Hispanic	23.78	31.06	16.42	44.76	36.54	49.34	42.23
Asian or Pacific Islander, Non-Hispanic	42.30	43.14	30.51	45.00	37.05	51.32	39.74
Native American, Non-Hispanic	30.24	34.37	20.61	39.17	32.05	52.23	50.63

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), Table AFFHT004, November 2017.

Education

Information on K-12 schools in Loma Linda (from www.publicschoolreview.com) shows that the City has only one public school (Bryn Mawr Elementary) and two private schools (Loma Linda Academy and Loma Linda Children’s Center). The public school’s testing ranking is 8/10, which is in the top 30 percent of public schools in California for the 2018-2019 school year. Bryn Mawr Elementary is located southeast of the City and in a modest resources area. Bryn Mawr’s student population is 83 percent non-white, a majority of whom are Hispanic. Loma Linda Academy ranks among the top 20 percent of private schools in California,

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where 60 percent of students are non-white. Loma Linda Children Center is a daycare facility. Both of these private schools are located near Loma Linda University, a low resource area.

Transportation

San Bernardino County residents in urban and suburban areas generally have direct access to transportation infrastructure. The County is traversed by several major freeways within its boundaries (including Interstate 15, 10, and 210 some of which border or are in very close proximity to Loma Linda). Proximity to these highways allows access to employment and other activity centers in Los Angeles and Orange County.

Additionally, the City scored 6.5 in the AllTransit Performance Score (Center for Neighborhood Technology 2019, AllTransit, alltransit.cnt.org) indicating that the City had a moderate combination of trips per week and number of jobs accessible enabling a negligible number of people to take transit to work. The City's score was higher than the County score of 4.4. AllTransit data also show that in Loma Linda, 88.3 percent of workers live within one-half mile of transit—the same as the 88.3 percent for the County. Loma Linda has access to bus service provided by the Riverside Transit Authority and Omnitrans. Omnitrans has a network of high-frequency, high-quality bus rapid transit routes throughout the County, known as sbX. One of these routes, the Green Line, runs along Tippecanoe Avenue, ending at the Loma Linda Medical Center. Additionally, the San Bernardino County Transportation Authority is in the process of implementing a new rail service, known as Arrow, between Redlands and Downtown San Bernardino. A station is planned to be located at Tippecanoe Avenue and Hardt Street and will have a connection point with Omnitrans' Green Line.

Employment/Economic

Local economic characteristics impact local housing needs, even though these characteristics may not be directly related to fair housing. These economic characteristics include the types of jobs available within the municipality, the way residents access jobs (e.g., auto, transit, etc.), the types of occupations held by residents, and their household income. Residents in Loma Linda are primarily employed in educational services, and health care and social assistance (47 percent), retail trade (10 percent), and professional, scientific, and management, and administrative and waste management services (seven percent). The median incomes for these industries are \$50,221, \$25,641, and \$39,297, indicating that about half of the City's working population is employed in a middle wage occupation. The major employer in the City is Loma Linda University Medical Center, which includes both medical and educational institutions. Employment characteristics are important, as they have a direct relationship with income. In Loma Linda, the other half of workers outside of the educational services, and health care/social assistance industry are making less than \$50,000, indicating the need for expanding access to higher-paying industries.

In terms of unemployment, October 2021 unemployment data from the State Employment Development Department reported that San Bernardino County had an unemployment rate of 6.3 percent while the State of California had an unemployment rate of 6.4 percent. Loma Linda had a lower level of unemployment (4.7 percent), among cities in western and central San Bernardino County, San Bernardino (8.4 percent), Colton (6.6 percent), Montclair (5.0 percent), Ontario (5.6 percent), and Fontana (5.9 percent). Unemployment was similar in Redlands (4.3 percent) and Yucaipa (4.8 percent).

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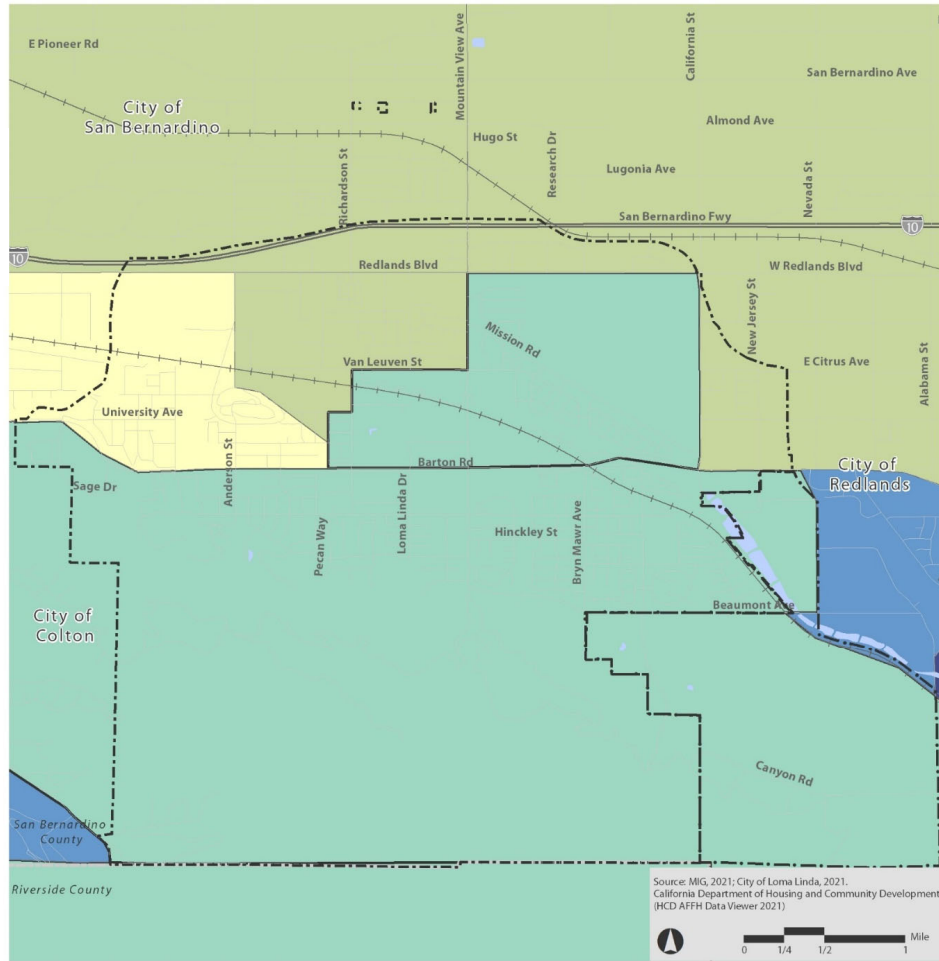
TCAC Opportunity Maps

HCD and the California Tax Credit Allocation Committee (TCAC) coordinated efforts to produce opportunity maps that evaluate specific economic, environmental, and educational characteristics that have been shown by research to support positive economic, educational, and health outcomes for low-income families. The TCAC/HCD Opportunity Maps are intended to display the areas that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of TCAC is to oversee the Low-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity.

Shown on Figure E-6, most of the City is designated as a moderate resource area. Two areas have lower designations: the area generally located south of I-10, north of Van Leuven Street between Anderson Street and Mountain View Avenue is designated a low resources area. The area around the university, as well as areas to the north and west of it, are designated as a high segregation and poverty area, likely due to a significant population of college students. Low resource areas are mostly located in the northernmost portion of the City, directly south of Interstate 10. This area is also predominantly industrial, with several pockets of mobile home and multi-family developments. TCAC and HCD define these as areas where there

City of Loma Linda 2021-2029 Housing Element

**Figure E-6:
TCAC Opportunity Areas
(2021) Composite Score -
Tract**



Source: MIG, 2021; City of Loma Linda, 2021.
California Department of Housing and Community Development
(HCD AFFH Data Viewer 2021)



are fewer opportunities to access jobs, education, and lower home values in this tract in addition to other economic, environmental, and educational indicators. **The designation of Low Resource means the City has a need to prioritize its resources towards improving opportunities for current and future residents.**

Disproportionate Housing Needs

Disproportionate housing need generally refers to a condition in which significant disparities exist in certain groups of residents experiencing a category of housing need when compared to the total population experiencing that category of housing need in the applicable geographic area. The disproportionate housing need analysis looks at cost burden, overcrowding, and environmental justice. Overall, data shows that disproportionate housing need prevails in the northwest areas of the City. Details are provided below.

Cost Burden

State and federal standards specify that households spending more than 30 percent of their gross annual income on housing experience a “housing cost burden.” When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care. In Loma Linda, 39 percent of households are overpaying for housing. Lower-income households have a much higher rate of overpayment at 74 percent. Overpayment also varies by tenure. For owner-occupied households, 27 percent of all households are overpaying compared to 54 percent of lower-income owner households. For renter households, 47 percent of all households are overpaying compared with 76 percent of lower-income renter households.

Figures F-7 and F-8 show cost burden (overpayment) for homeowners and for renters. Compared with the surrounding areas, Loma Linda has a lower level of cost burden for homeowners, with most parts of the City showing cost burden for homeowners under 40 percent. No homeowner cost burden data are available for the area around the university or areas to the north and west. The areas northeast of the Mountain View Avenue and Barton Road intersection have the lowest levels of cost burden among homeowners. For renters, all areas of the City show cost burden for 40 to 60 percent of renter households. Most cities in the region have areas of cost burden exceeding 80 percent of renter households, but Loma Linda does not.

Overcrowding and Substandard Housing

In response to a mismatch between household income and housing costs in a community, some households may not be able to buy or rent housing that provides a reasonable level of privacy and space. According to both California and federal standards, a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms, and halls). In Loma Linda, 335 units (4.8 percent) of housing units are overcrowded. Proportionally, overcrowding is the same for both rental and owner units. Figure E-9 shows that most of Loma Linda has overcrowding rates lower than California (8.2 percent) and lower than most areas in the region. Within the City, the area generally bounded by Redlands Boulevard, Anderson Street, Mountain View Avenue, and Van Leuven Street have the highest level of overcrowding (15.73 percent). In contrast to the level of overcrowding in the City, cities in central and western San Bernardino County (San Bernardino, Rialto, Fontana, Bloomington and Colton) show significantly more tracts with overcrowding levels higher than the State average. Cities east

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of Loma Linda (Redlands and Yucaipa) show few tracts with overcrowding levels higher than the State average.

Substandard housing is housing that poses a risk to the health, safety, and/or physical well-being of residents. These issues can increase the risk of disease, crime, poor mental health, and other social impacts. HUD CHAS data (2014-2018) provide an estimate of households with at least one of four housing problems that contribute to substandard housing (incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, or cost burden greater than 30 percent). In Loma Linda, 42.8 percent of households reported one of these housing problems, a level slightly lower than San Bernardino County (44.9 percent) and the State (44.3 percent).

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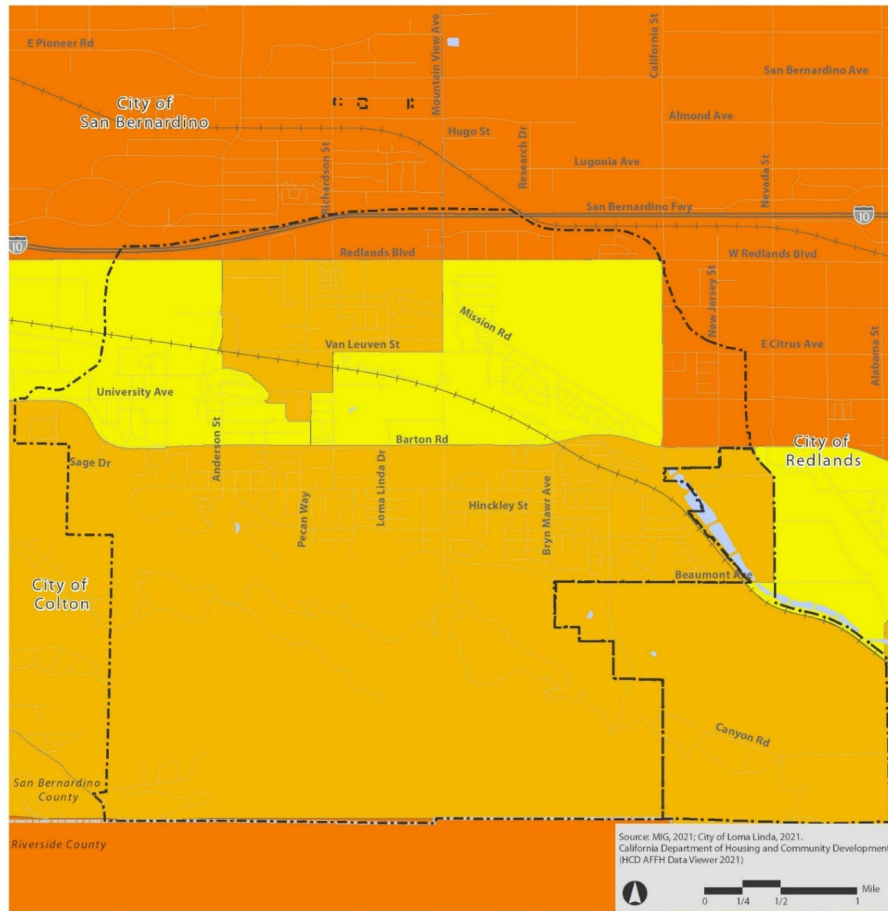
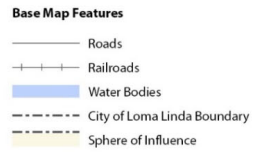
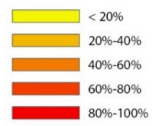
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Environmental Justice

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of certain ethnicities and lower socioeconomic status to environmental pollutants. Figure E-10 shows CalEnviroScreen results in Loma Linda. The map shows that two census tract have an overall CalEnviroScreen score of 82 and 90 percent meaning that these areas experience significant pollution burdens and socioeconomic characteristics. These census tract in particular score 80 percent and above in particulate matter, ozone, drinking water contaminants, pesticides, and poverty. The two census tracts can also be considered disadvantaged communities (DAC) consistent with SB 535. These DACs are defined as the top 25 percent scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low socioeconomic characteristics. The DACs are located in and around the university and neighborhoods to the north and west.

City of Loma Linda 2021-2029 Housing Element

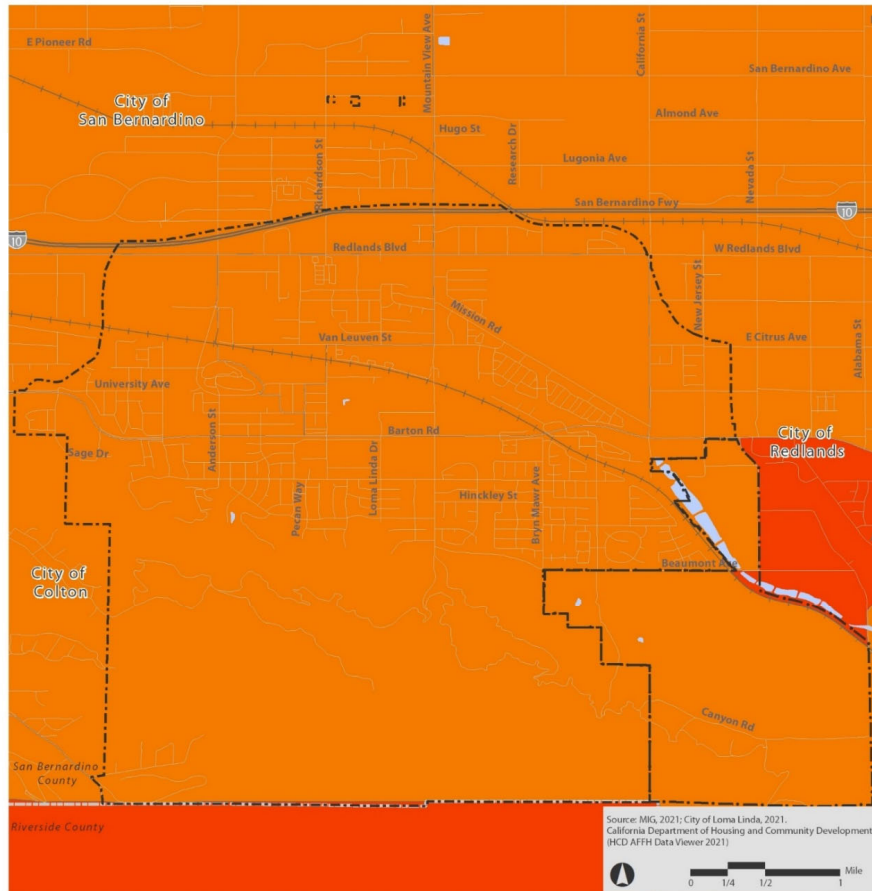
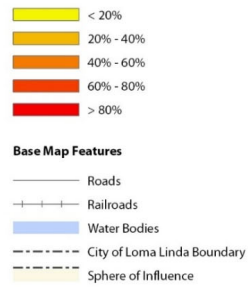
**Figure E-7:
Overpayment by Homeowners
(ACS, 2015-2019) - Tract**



Source: MIG, 2021; City of Loma Linda, 2021.
California Department of Housing and Community Development
JHCD AFFH Data Viewer (2021)

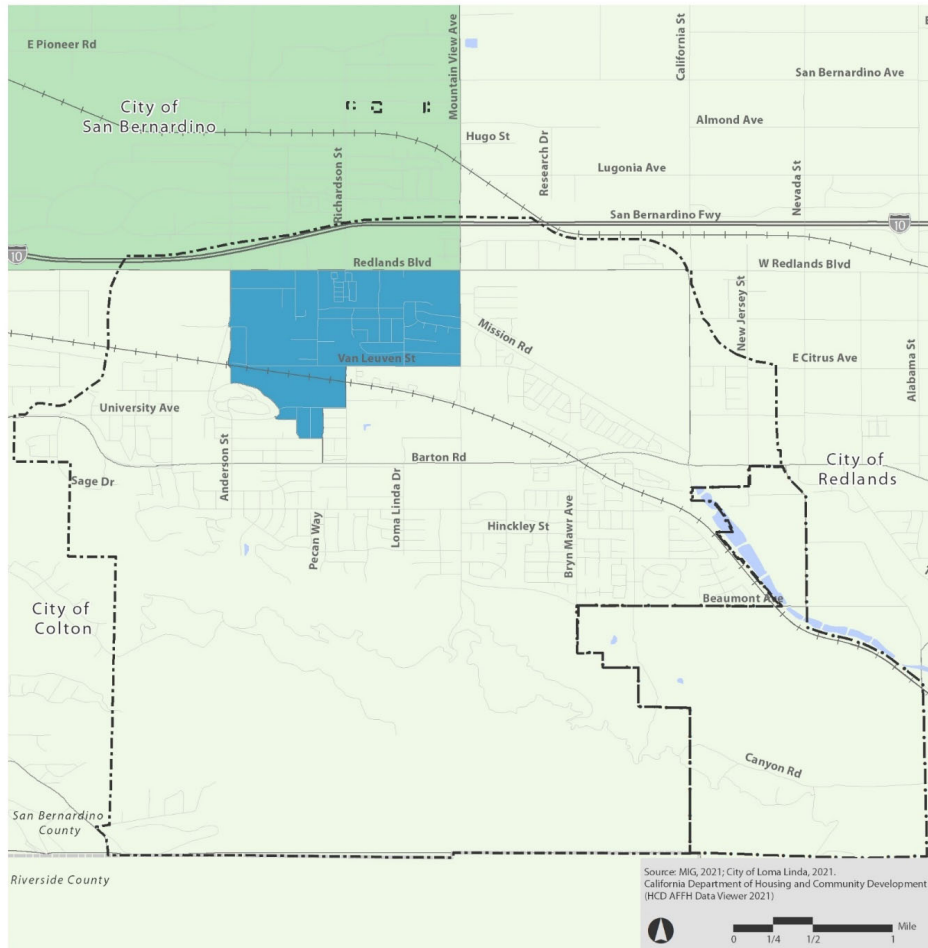
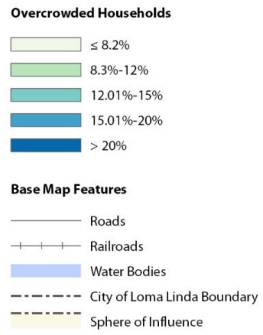
**City of Loma Linda
2021-2029
Housing Element**

**Figure E-8:
Overpayment by Renters
(ACS, 2015-2019) - Tract**



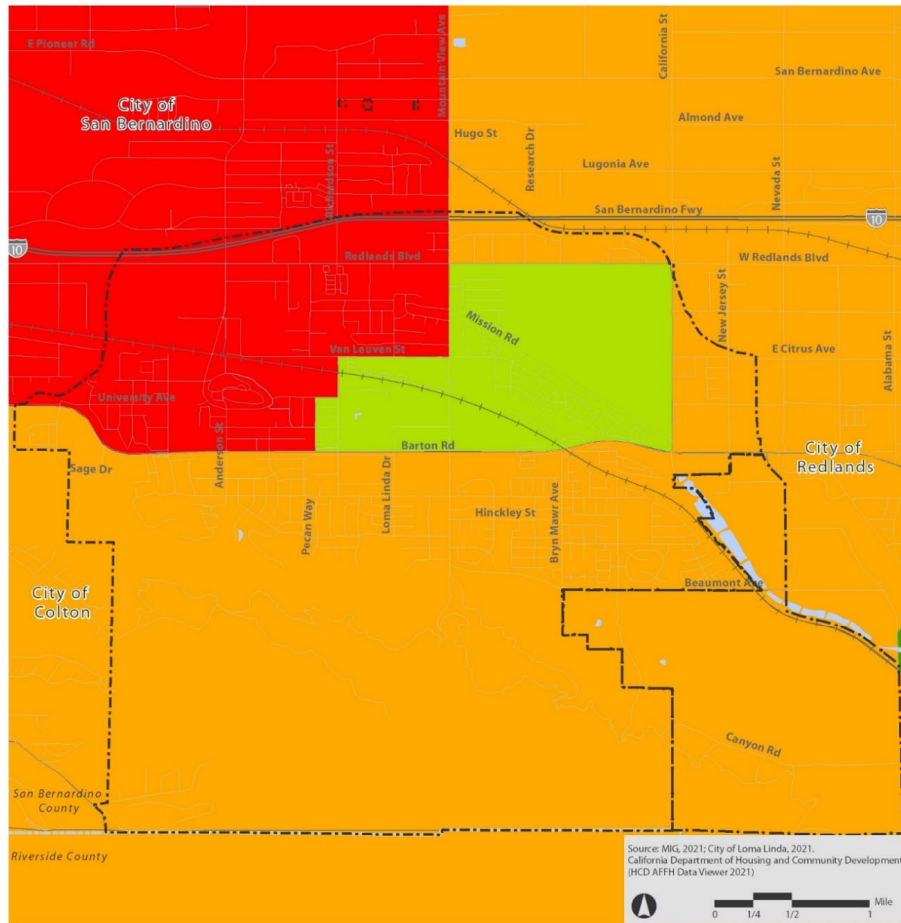
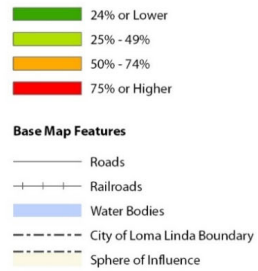
City of Loma Linda 2021-2029 Housing Element

**Figure E-9:
Overcrowded Households
(CHHS) - Tract**



City of Loma Linda 2021-2029 Housing Element

Figure E-10:
CalEnviroScreen 3.0,
2018 - Tract



Displacement Risk

Displacement refers to instances where a household is forced or pressured to move from their home against their wishes. Areas with high demand for homes drive up housing costs and increases pressure for redevelopment, resulting in the potential for displacement. The displacement risk in Loma Linda can be evaluated based on physical and economic displacement.

The HCD AFFH viewer identifies communities or places where residents may be particularly vulnerable to displacement in the context of rising property values. Vulnerability is defined as: share of very low-income residents is above 20 percent and the tract meets two of the following criteria: 1) share of renters is above 40 percent, 2) share of people of color is above 50 percent, 3) share of very low-income households (50 percent AMI or below that are severely rent-burdened housing is above the county median, and 4) they are areas in close proximity that have been experiencing displacement pressures (percent change in rent above county median for rent increase) OR difference between tract median rent and median rent for surrounding tracts above median for all tracts in the county (rent gap). The central and western areas of San Bernardino County, including parts Barstow and Victorville, are vulnerable to displacement. The areas vulnerable to displacement in Loma Linda are mostly located in the northern area, between Barton Road and Interstate 10.

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Physical Displacement

Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, the expiration of covenants on rent- or income-restricted housing, or the rising cost of housing. Housing law requires an inventory and analysis of government-assisted dwelling units eligible for conversion from lower-income housing to market rate housing during the next 10 years. Reasons for this conversion may include expiration of subsidies, mortgage pre-payments or pay-offs, and concurrent expiration of affordability restrictions.

Based on City records and information from the California Housing Partnership Corporation, in the next 10 years (2021-2031) no federally or State-assisted units have an expiring affordability covenant. However, six single-family homes providing ownership housing (funded by prior redevelopment agency set-aside monies) will have covenants expiring during this time frame. The does not have the financial or management resources to purchase and resell the units but is committed to working with local organizations that would have the ability to subsidize purchase by income-qualified households.

Physical displacement may also be linked to non-financial forces such as segregation. The most common index of racial segregation is the dissimilarity index, which measures the extent to which different groups of people live in different neighborhoods in a city or metro area. According to the dissimilarity index, San Bernardino County has higher levels of segregation than the region and is generally increasing, especially amongst Hispanic residents. This presents a potential risk of displacement for vulnerable communities, such as people of color, living in the County.

Also, it is possible for local government policies to result in the displacement or affect representation of minorities or persons living with a disability. Currently, most of the cities with adopted reasonable accommodations procedures have a definition of a disabled person in their zoning ordinances. The City of Loma Linda allows for reasonable accommodations for persons with disabilities, but it does not have a formal procedure for making reasonable accommodation exceptions as part of the development review

process. As part of implementation of this Housing Element, the City will formalize provisions to make reasonable accommodation exceptions for persons with disabilities in the land use and zoning application, review, and approval process.

Economic Displacement

Economic displacement is due to the inability to afford rising rents or costs of homeownership like property taxes. Residents of the City of Loma Linda generally pay more for housing in comparison to County residents as a whole. The Loma Linda median home price in 2020, based on information provided by CoreLogic, was \$614,000. This was 14 percent higher than the median price in 2019. The median home price in San Bernardino County in 2020 was \$396,000, lower than Loma Linda’s median home price. Figure E-12 shows HUD’s Location Affordability Index, which provides standardized housing and transportation costs by state. Almost all of Loma Linda has a median gross rent of \$1,500, except for the area near the university where median gross rents are \$1,000. Census data show that the average rent in Loma Linda is \$1,338 per month, with most (40.6 percent) paying between \$1,000 and \$1,499 in rent. The real estate website Zumper.com reports a median rent of \$1,155 for one-bedroom units, \$1,512 for two-bedroom units, and \$1,898 for three-bedroom units in Loma Linda as of January 2021. HUD-determined fair market rents for San Bernardino fall within the range of the rents within Loma Linda. The areas of the City north of Barton Road are susceptible to displacement because of the high proportion of households who are renters (Figure E-11). Within this area, the neighborhoods west of Mountain View Avenue have lower median household incomes (Figure F-12), making these renters particularly susceptible to displacement. This is also supported by the AFFH Data Viewer measurement of displacement vulnerability.

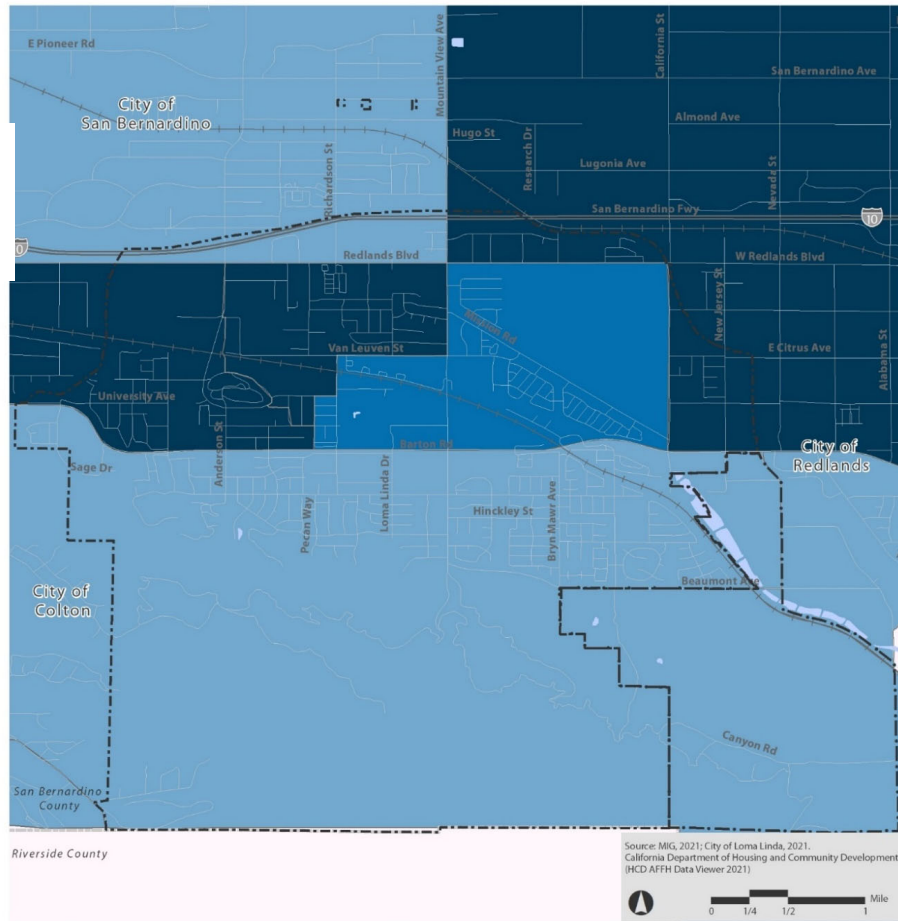
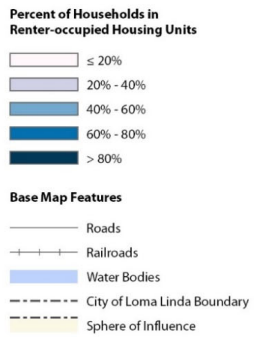
Regionally, areas in most cities in San Bernardino County have median gross rents of \$1,500 or less, as indicated by the Location Affordability Index. The areas with the highest rents are along the northern parts of Upland, Rancho Cucamonga, Fontana, and the southern portions of Redlands. Additionally, many cities in Los Angeles County have median gross rents two times higher than most cities in San Bernardino County.

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Deleted: Figure E-12 shows that tracts for the rest of the City have median rents between \$1,000 and \$1,500. Low-income residents could be at risk of economic displacement due to the generally high costs of housing in the City. Furthermore, in Loma Linda, 39 percent of households are overpaying for housing, as described above.

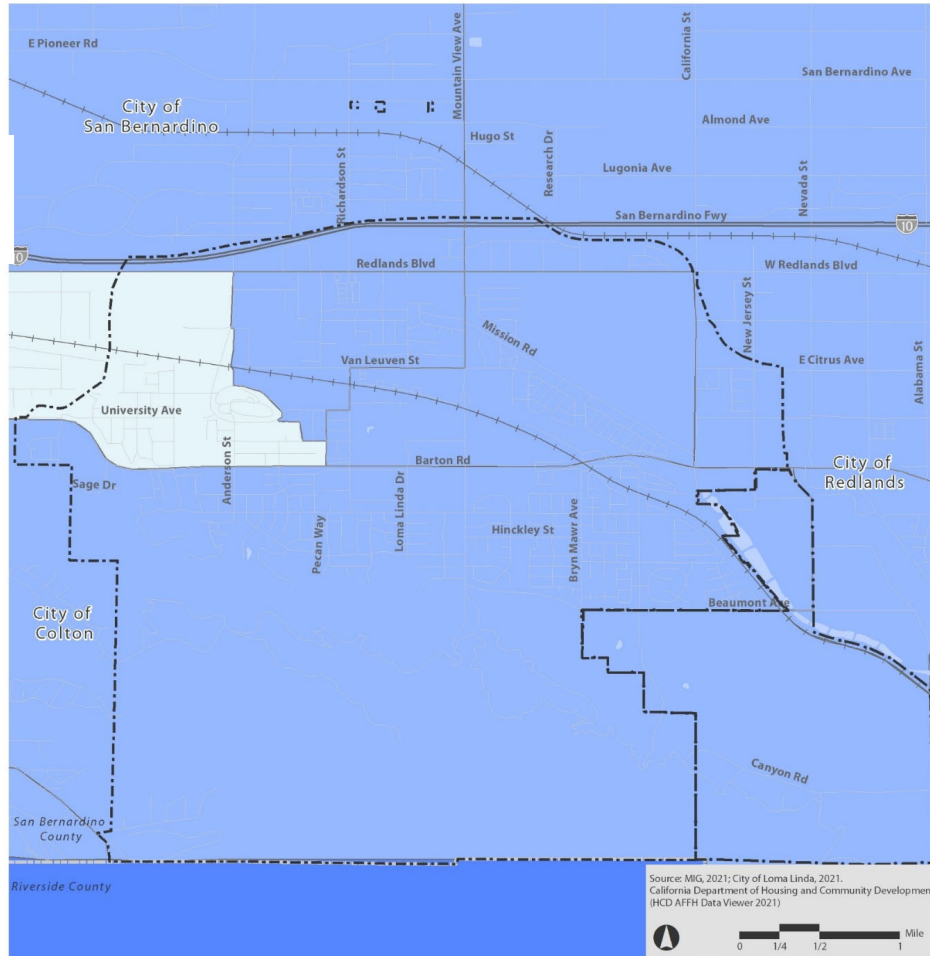
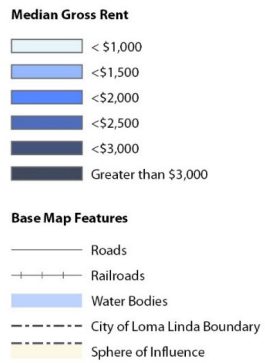
City of Loma Linda 2021-2029 Housing Element

**Figure E-11:
Percent of Households in
Renter-occupied Housing
Units (HUD) - Tract**



City of Loma Linda 2021-2029 Housing Element

**Figure E-12:
Location Affordability Index
(HUD) - Tract**



Source: MG, 2021; City of Loma Linda, 2021.
California Department of Housing and Community Development
(HCD AFFH Data Viewer 2021)



Sites Inventory

State law requires that for housing elements due on or after January 1, 2021, sites must be identified throughout the community in a manner that affirmatively furthers fair housing opportunities (Government Code Section 65583[c][10]). “Affirmatively furthering fair housing” means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity. Figure C-3 in the Housing Resources appendix shows the site inventory to address the City’s RHNA for 2021-2029.

About half of the lower-income RHNA will be addressed within the Groves Specific Plan area on four underdeveloped sites designated for mixed-use development; these sites can accommodate a combination of commercial and residential uses at a minimum density of 20 dwelling units per acre. These underdeveloped sites have a capacity of 307 units in the lower-income category. The Groves Specific Plan also has capacity on underutilized land for 93 lower-income units. This area does not have concentrations of persons living in poverty nor non-White residents. It is also not identified as a lower-income area and is designated as a moderate resources area (as is most of the City). The Groves Specific Plan explicitly requires development of lower-income housing.

The other approximately half of the lower-income RHNA sites are in Special Planning Area (SPA) C, an underdeveloped area with a capacity of 416 lower-income units. The area includes 15 parcels—four vacant and 11 improved—with various types of housing. The Housing Element calls for mixed-use development within SPA C consisting of residential (including senior housing), commercial, institutional, and educational. Residential densities are to be high or very high near streets, with medium density towards the eastern part of the site. This area does not have concentrations of persons living in poverty or non-White residents. However, it is the lowest income area in the city and is designated a low resources area, as well as having a concentration of overcrowded households and renter households. The designations are likely due in part to the undeveloped character of the area and high concentration of students living near the university. The location of potential housing sites in this area represents both improved and exacerbated fair housing and equal opportunity conditions.

Overall, the sites inventory improves fair housing and equal opportunity conditions. These sites represent locations where new higher-density housing can be provided. Incentivizing new residential development in these areas, stimulating economic development, and jobs creation will contribute to a higher quality of life for existing and future residents. The addition of housing will also work to address overcrowding. Still, poverty and overcrowding issues near the university may persist, as the area will always have a high concentration of students. Nonetheless, the location of very low-income sites in and near SPA C and the university requires a continued effort from the City to address the needs of the community and work toward the development of these areas. The City has been proactive in working with Loma Linda University officials (the university owns many properties within the planning area) to develop a comprehensive redevelopment strategy and plan that includes a substantial number of new housing units. This element includes a program action in Program 1.1 for this proactive effort to continue.

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The distribution of lower-income RHNA sites represents

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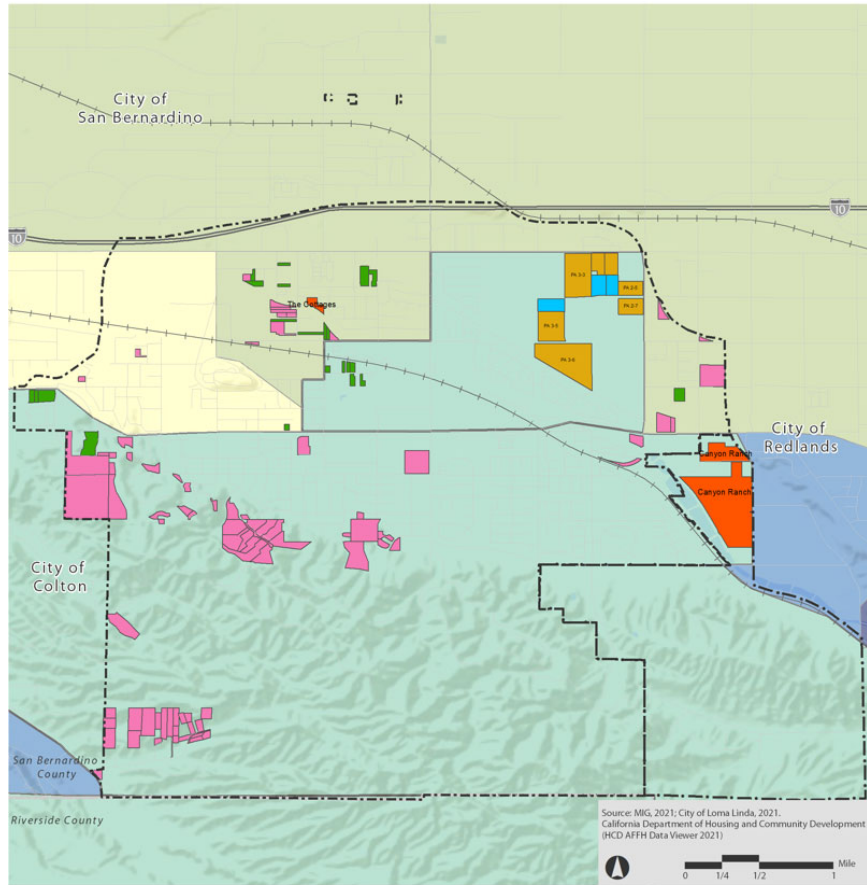
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City of Loma Linda
2021-2029
Housing Element

Figure E-13;
TCAC Opportunity Areas
(2021) and Sites Inventory

- TCAC Opportunity Areas (2021) Composite Score**
- Highest Resource
 - High Resource
 - Moderate Resource (Rapidly Changing)
 - Moderate Resource
 - Low Resource
 - High Segregation & Poverty
 - Missing/Insufficient Data
- Sites Inventory**
- Pipeline Projects
 - The Groves Specific Plan-Available Sites
 - Approved Projects
 - Underutilized Sites >.5 & <10 ac
 - Vacant Sites >.5 & <10 ac
- Base Map Features**
- Roads
 - Railroads
 - Water Bodies
 - City of Loma Linda Boundary
 - Sphere of Influence



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Local Knowledge

Public Outreach

The Loma Linda community provided input into this Housing Element through a series of focus group meetings, a community workshop, and study sessions with the Planning Commission and City Council. On February 10 and 16, 2021, the City conducted two focus group meetings. Invitees to both meetings included local and regional housing services providers, representatives from transitional and supportive housing, affordable and market-rate housing developers, and neighborhood representatives. On March 9, 2021, the Planning Commission and City Council hosted a joint workshop to hear from residents regarding housing concerns and ideas for meeting housing needs. The findings from these outreach efforts are as follows:

- Housing Cost is a key concern:
 - Lack of affordable housing
 - Rising instances of homelessness and inability of service providers to locate temporary housing for their clients
 - Availability of safe and affordable housing
 - Inability of lower-income families to accumulate wealth in the form of real estate since they cannot afford to buy homes. This has long-term economic effects, as seniors do not have a supplemental source of retirement income.
 - The City needs more transitional housing to allow people to work their way back up the economic ladder.

- Interest in new housing that was affordable and met the needs of seniors and families:
 - Embracing new home typologies: tiny homes, manufactured and modular housing
 - Use of vacant lots owned by the City
 - Encouraging Loma Linda University to construct student and faculty housing on its campus
 - Accessory dwelling unit regulations that are "friendly"
 - Hotel/motel conversions to housing
 - Designated sites for affordable housing that will allow applications to be processed with minimum delay and hassle

Historic Patterns of Development

In Loma Linda, the Loma Linda University area was the epicenter of development during the late 1800s and early 1900s. New residential growth since the early 1990s has been primarily in areas just outside of the university in the North Central and Bryn Mawr neighborhoods. The Disproportionate Need and Displacement analysis shows the need for more housing near the university, since this area has high rates of overcrowding, housing overpayment, and high proportions of renters. Again, this is likely due to the high concentration of university students and service-level staff at the university and medical center. Nonetheless, this highlights the need for an increase in affordable student housing. The City is working in concert with university officials to address issues of housing affordability and capacity.

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Identification and Prioritization of Local Fair Housing Issues and Contributing Factors

Housing Element law requires that the City list and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues, are fundamental to adequate goals and actions, and must be related to the overall analysis. This identification and prioritization must give highest priority to factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing. The following are contributing factors that affect fair housing choice in Loma Linda.

1. Disproportionate housing needs in areas surrounding Loma Linda University

The analysis found that areas north of Loma Linda University and Medical Center had higher levels of overcrowding and overpayment that overlapped with lower median incomes and higher proportions of renters.

Contributing factors:

- Inadequate supply/production of affordable/special needs housing
- Much of Loma Linda's residential development has been in single-family neighborhoods, but a need for multi-unit housing is needed around the university to meet the needs of faculty, staff, and students.

The City is taking several actions (reflected in the Housing Plan) to address this contributing factor to fair housing issues and affirmatively further fair housing in the city. The main strategy to address housing needs:

- Provide more diverse housing opportunities in and around the university.
- Coordinate with Loma Linda University and actively participate in campus planning activities as a way to continuously assess and respond to the needs of students, faculty, and staff.
- In partnership with Loma Linda University, develop methods to accelerate the creation of affordable student, faculty, and staff housing by assessing barriers affecting development and developing solutions to overcome them.

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Contributing Factors	
Limited supply of affordable housing disproportionately impacts protected classes	<ul style="list-style-type: none"> • competitiveness and information, • Consider and add development of a • Consider affordabl the development • Consider offering exchange for affo agreeing to long-existing affordabl
Housing is more affordable in remote areas, but these areas lack access to opportunity	<ul style="list-style-type: none"> • In the routine mo ensure that affirm in promoting affc including people • Use CDBG and HC rental housing wi (2020). • Continue to fund food, and suppor beginning 2020). • Continue to fund public facilities in
The Housing Authority has difficulty placing housing vouchers. There are long wait lists and long placement timeframes. Landlords often refuse to rent to voucher holders	<ul style="list-style-type: none"> • Adopt a local sou
Stakeholder input indicates a need for improved coordination in planning for affordable housing between the County and its cities	<ul style="list-style-type: none"> • Develop a strateg participation in fu involvement in Ci which cities know housing developi

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Contributing Factors	
The prevalence of short-term rental housing, particularly in vacation areas, constricts the availability of rental housing and increases rental prices	<ul style="list-style-type: none"> • Conduct a public of short-term, wh housing.
NIMBYism prevents proposed new developments	<ul style="list-style-type: none"> • Develop educatic affordable and w

Impediment #3: Levels of Residential Segregation are Increasing

Increasing segregation patterns diminish housing options and impede community relations	<ul style="list-style-type: none"> • Continue using C high-quality, affo with good access 2020) • In the routine mo ensure that affirm in promoting affc including people 2020). • Explore options fr Cities Big Table m neighborhoods tl and cultural exch attributes of dive 2021)
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Impediment #4: Community Education on Fair Housing is a Priority

Residents have an ongoing need for education regarding fair housing rights and resources	<ul style="list-style-type: none"> • Working with a cc update and coorc public with inform recognize discrim beginning Q1, 20
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Contributing Factors	
Multi-lingual resources and stronger connections within communities of color and among people with limited English proficiency will facilitate deeper penetration of fair housing education to vulnerable communities.	<ul style="list-style-type: none"> • Translate fair housing ed County. (Q1, 2021) • Continue fair housing ed County works with (ex: c channels of communic limited English proficien

Impediment #5: People with Disabilities Have Limited Housing

Insufficient accessible housing exists to serve the needs of	<ul style="list-style-type: none"> • Consider opportunities to housing units for people
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Table 4: Housing Element Sites Inventory: Table Starts on Cell A2

Job/Division Name	Site Address/Interchange	Highway/SP Code	Accession Parcel Number	Competition Mile	General Plan Designation (Element)	zoning Designation (Element)	Minimum Density at Access (units/acre)	Max Density at Access (units/acre)	Permitted (Acreage)	Estimate (Use/Yearly)	Infrastructure	Publicly Owned
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Table 4: Housing Element Sites Inventory, Table B1616 to C11 A2

Job/Division Name	Site Address/Description	IS Dept. ZIP Code	Accession Parcel Number	Competition Area	General Plan Designation (Element)	Zoning Designation (Element)	Minimum Density at least (units/acre)	Max Density at least (units/acre)	Permitted (Acreage)	Estimate (Use/Yearly)	Infrastructure	Publicly Owned
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Loma Linda 2021-2029 (6th Cycle) Housing Element HCD Comments Matrix

<i>HCD Review Comments on the Draft Housing Element November 22, 2021 Letter</i>	How HCD Comments Have Been Addressed in the Revised Housing Element
<p>A: Review and Revision</p> <p>Special Needs Populations: As part of the review of programs in the past cycle, the element must provide an evaluation of the cumulative effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).</p>	<p>Additional text has been added to the introductory portion of Appendix D: Evaluation of Progress toward Implementing the 2014-2021 Housing Element to describe the cumulative effectiveness of housing programs.</p>
<p>B: Housing Needs, Resources, and Constraints</p>	
<p>1. Affirmatively further[ing] fair housing (AFFH)</p> <p>Fair Housing Enforcement and Outreach: The element must include the City’s ability to provide enforcement and outreach capacity which can consist of actions such as the City’s or contractor’s ability to investigate complaints, obtain remedies, or the City’s ability to engage in fair housing testing. The element currently states 680 housing discrimination complaints in San Bernardino County, with a majority alleging disability as a basis for discrimination but should be updated to include how many of these were filed in the City. The analysis should also address outreach that can be used to supplement analysis of other components of the assessment of fair housing and site inventory to better inform contributing factors, priorities, and meaningful actions.</p>	<p>As described beginning on page E-1, the City does not have a local housing authority or other internal agency that oversees fair housing issues. All fair housing complaints are referred to the Inland Fair Housing and Mediation Board (IFHMB). The City does not maintain records regarding the number or type of referrals, as staffing and other resources are constrained. The IFHMB has not been able to provide information to the City regarding the number of complaints originating from Loma Linda residents. This information has been added to Appendix E.</p> <p>The actions associated with Program 5.1 in the Housing Plan identify outreach measures the City will take inform residents of their rights and to educate landlord regarding their responsibilities. Text has been added to indicate that as resources permit, the City will collect information about the referrals to better understand local conditions.</p>
<p>Integration and Segregation: The element includes limited regional data on integration and segregation of familial status. The element needs to include complete local and regional data on integration and segregation for the City and analyze it for both local and regional trends and patterns.</p>	<p>The discussion in Appendix E – Affirmatively Furthering Fair Housing has been expanded to include local and regional data.</p>

Loma Linda 2021-2029 (6th Cycle) Housing Element HCD Comments Matrix

<i>HCD Review Comments on the Draft Housing Element November 22, 2021 Letter</i>	How HCD Comments Have Been Addressed in the Revised Housing Element
<p>Racial/Ethnic Areas of Concentration of Poverty: The element includes some data on R/ECAP but no regional data or analysis concentrated areas of affluence. The element should also be revised to include local and regional data on areas of affluence and analyze this data for trends and patterns.</p>	<p>The discussion in Appendix E – Affirmatively Furthering Fair Housing has been expanded to include local and regional data.</p>
<p>Disproportionate Housing Needs: The element includes some data on cost-burdened households and overcrowding at a city level but should also include analysis at a regional level for cost-burdened and overcrowded households. In addition, this analysis should address fair housing issues at a local or regional level for substandard housing and homelessness.</p>	<p>The discussion in Appendix E – Affirmatively Furthering Fair Housing has been expanded to include local and regional data.</p>
<p>Local Data and Knowledge, and Other Relevant Factors: The element does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.</p>	<p>The discussion in Appendix E – Affirmatively Furthering Fair Housing has been expanded to include local and regional data, and to analyze regional trends.</p>
<p>Sites: The element must include an analysis demonstrating whether sites identified to meet the RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing (AFFH). A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that effects the existing patterns for all</p>	<p>The discussion in Appendix E – Affirmatively Furthering Fair Housing has been expanded to address the sites inventory relative to income categories and to analyze whether the sites identification improves or exacerbates historic conditions.</p>

Loma Linda 2021-2029 (6th Cycle) Housing Element HCD Comments Matrix

<i>HCD Review Comments on the Draft Housing Element November 22, 2021 Letter</i>	How HCD Comments Have Been Addressed in the Revised Housing Element
<p>components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies).</p>	
<p>Goals, Priorities, Metrics, and Milestones: Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. Currently, programs are not sufficient to facilitate meaningful change and address AFFH requirements. Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	<p>Revisions have been made throughout the Housing Plan chapter to address these comments. See the track-changes edits.</p>
<p>2. Land Inventory</p> <p>The City has a RHNA of 2,051 housing units, of which 834 are for lower-income households. To address this need, the element relies on approved and pipeline projects, ADU production, vacant sites, and nonvacant sites. To demonstrate the adequacy of these sites and strategies to accommodate the City’s RHNA, the element must include complete analyses: (per following)</p>	

Loma Linda 2021-2029 (6th Cycle) Housing Element HCD Comments Matrix

<i>HCD Review Comments on the Draft Housing Element November 22, 2021 Letter</i>	How HCD Comments Have Been Addressed in the Revised Housing Element
<p>Sites Inventory: Table C-3 shows a shortfall in sites available for the low-income housing category. While there does seem to be a surplus of sites in the very low-income housing category, the element must either reallocate capacity from this surplus to show that there are sufficient sites to accommodate the RHNA by income group or include a program to rezone capacity to accommodate the shortfall.</p> <p>In addition, the element should clearly demonstrate whether an application was submitted for 25239 Cottage Street project (p. C-3). The element must clarify if an application has been submitted, what entitlements are necessary, and the number of units based on the project application.</p>	<p>As allowed by law, the two lower-income categories have been combined. Table C-3 has been revised to show +124 for the lower-income RHNA.</p> <p>Updated information regarding the 25239 Cottage Street preapplication has been added.</p>
<p>Previously Identified Nonvacant and Vacant Sites: The element indicates sites identified in the inventory were previously identified in past housing elements (p. C-7). If nonvacant sites identified in a prior adopted housing element or vacant sites identified in two or more consecutive planning periods, the sites are inadequate to accommodate housing for lower-income households unless:</p> <ul style="list-style-type: none"> • The site's current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting the appropriate density; and • The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households. (Gov. Code, § 65583.2, subd. (c).) 	<p>The sites used in prior elements to satisfy the RHNA for lower-income units were selected based on zoning at the default density of 20 units per acre. Additional analysis and discussion have been included in Appendix C.</p> <p>Program 1.1 has been amended to require the rezoning per Government Code Section 65582.2(c).</p>
<p>Realistic Capacity: While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site</p>	<p>Analysis has been added to demonstrate trends of building to the maximum allowed densities.</p> <p>Regarding lots that allow 100 percent nonresidential uses, the only sites included in the inventory that meet these criteria are those</p>

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<p>must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also should analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of nonresidential development, performance standards, and development trends supporting residential development.</p>	<p>zoned Institutional-Health Care. See the additional analysis in Appendix C – Housing Resources.</p>
<p>Small Sites: The electronic site inventory and analysis identifies small sites to accommodate the City’s lower-income RHNA (p. C-6). Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element should provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation, such as common ownership. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City’s lower-income housing need.</p> <p>As the element relies on consolidated small sites to accommodate the RHNA for lower-income households, it should include a program(s) to facilitate lot consolidation and development of housing on small sites. For example, the program could commit to (1) granting density bonuses above state density bonus law. (Gov. Code, § 65915.); (2) deferring fees specifically for consolidation; (3) expediting permit processing; (4) identifying and targeting specific financial resources; and (5) modifying development standards.</p>	<p>Program 1.1 has been expanded to include a lot consolidation ordinance.</p>

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<p>Large Sites: The electronic site inventory and analysis identifies large sites to accommodate for City’s lower-income RHNA. The element should update any internal analysis for consistency (p. C-7). Sites larger than 10 acres in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing. (Gov. Code, § 65583.2, subd. (c)(2)(A).) For example, a site with a proposed and approved housing development that contains units affordable to lower-income households would be an appropriate site to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(C).)</p>	<p>The text on page C-7 describes that fact that one of the two large sites is in The Groves Specific Plan and is planned for at least 99 units of affordable housing, as dictated by the Specific Plan.</p> <p>Text has been added to Appendix C documenting that recent projects have been approved at or near the maximum allowable densities, particularly within The Groves Specific Plan.</p>
<p>Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element describes in general the existing use of each nonvacant site for example “commercial”. This alone is not adequate to demonstrate the potential for redevelopment in the planning period. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. In addition, the element needs to also analyze the extent that existing uses may impede additional residential development. The element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the City and relate those trends to the sites identified. The element could also consider</p>	<p>Of the approximately 190 sites included in the sites inventory, all but a handful are either vacant or developed with one to five single-family homes. Of those nonvacant, nonresidential sites, three are remnant agricultural parcels and one supports an RV park and fast-food restaurant (and is zoned for mixed-used development within The Groves Specific Plan). Existing uses are not an impediment to residential development for the reasons described below. This information has been added to the sites inventory analysis.</p> <ul style="list-style-type: none"> • Within The Groves Specific Plan, properties are controlled by a master developer, and property owners within the plan area have agreed to the gradual transition of uses to the more intense uses allowed by the specific plan. • The Cottage Street project represents an example of a property owner wishing to replace a duplex with a higher-density project. • The Veterans’ Village project, which yielded 87 units on 4.37 acres, was built on a property containing five single-family

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<p>indicators such as age and condition of the existing structure expressed developer interest, low improvement to land value ratio, and other factors.</p> <p>In addition, specific analysis and actions are necessary if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.</p>	<p>units which were torn down to make way for Veterans' Village.</p> <ul style="list-style-type: none"> • In Planning Area 3-3 within The Groves, Highpointe Communities plans to remove a discontinued surface mining operation and develop a mixed-use community per the specific plan. • The cluster of single-family residences along Court Street, Lind Avenue, and Ohio Street form a neighborhood and are all zoned R-3. The houses, many showing signs of deferred maintenance, are interspersed with vacant lots and multifamily housing. The improvement to land value ratios are relatively low, indicating likely underinvestment. Home values in the neighborhood are at the low end of those in other neighboring cities. At least two adjacent lots are in common ownership, which creates an opportunity for consolidation and creation of a larger lot for redevelopment. <p>Additional analysis has been included in the sites inventory discussion regarding nonvacant sites for the lower-income RHNA. The analysis indicates that vacant sites will support more than 50 percent of the RHNA for lower-income units.</p>
<p>Accessory Dwelling Units (ADU): The element assumes an ADU buildout of 20 ADUs per year for a potential buildout of 167 units within the planning period. Given that the City has permitted 3 ADUs in 2018, 4 in 2019, 17 in 2020 (for an average of 6 units per year), it is not clear if a production level of 20 ADUs per year will be achievable over the planning period. As a result, the element should be updated to include supporting analysis for potential ADU production. Depending on the analysis, the element must commit to monitor ADU production throughout the course of the planning period and implement additional actions if not meeting target numbers</p>	<p>In 2021, the City approved 18 ADU permits and received inquiries for many more. The City anticipates a significant upward trend in ADU construction based on inquiries and the fact that a new ADU ordinance was adopted in early 2021. The City has also discussed with the San Bernardino County Transportation Authority (the Council of Governments for the region) programs to encourage and facilitate ADU production. This information has been added to the analysis, and the suggested monitoring program has been included in the Housing Plan.</p>

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<p>anticipated in the housing element. In addition to monitoring production, this program should also monitor affordability. Additional actions, if necessary, should be taken in a timely manner (e.g., within 6 months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.</p>	
<p>Availability of Infrastructure: The element must demonstrate the sites in the inventory have access to existing or planned water, sewer, and other dry utilities. (Gov. Code, § 65583.2, subd. (b).). For example, sites identified in the HR-C & HE-RE zones do not have availability and access to infrastructure as it will be evaluated at development (p. C-13). The element should either discuss any plans that demonstrate future access to infrastructure or add a program to address infrastructure capacity limitations or shortfalls.</p>	<p>Additional discussion has been added regarding the current construction of a new water reservoir and water line that will accommodate new development on vacant properties.</p>
<p>Priority Water and Sewer: Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element must demonstrate compliance with these requirements or add or revise programs as appropriate.</p>	<p>An action item has been added to Program 2.3 (Affordable Housing Development).</p>
<p>Environmental Constraints: The element must describe any known environmental constraints within the City that could impact housing development in the planning period. (Gov. Code, § 65583.2, subd. (b).)</p>	<p>The Environmental Constraints discussion has been added to the end of Appendix B.</p>

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<p>Sites with Zoning for a Variety of Housing Types:</p> <ul style="list-style-type: none"> • <i>Emergency Shelters</i>: While the element indicates shelters could be allowed in the PF zone (p. B-5 & B-10), it must identify a zone(s) where emergency shelters are permitted without a conditional use permit or other discretionary action and with sufficient capacity to accommodate the identified need for shelters. (Gov. Code, § 65583, subd. (a)(4).) The element must also describe the characteristics and suitability of the zone(s) for emergency shelters and meet parking requirements of AB 139. Please be aware, if the element cannot demonstrate compliance with the statutory requirements, HCD cannot find the element in compliance until zoning has been completed. • <i>Accessory Dwelling Units (ADUs)</i>: ADUs do not appear to be permitted consistent with state law. For example, ADUs are not permitted in all zones allowing residential uses (Table B-2). The element should demonstrate consistency with state requirements including programs as appropriate. 	<p>As indicated in Table B-2 on page B-6, emergency shelters are permitted by right in the PF zone without a requirement for a conditional use permit. The standards of use and development set forth in Municipal Code Section 17.44.030.A apply. The text on page B-12 has been expanded to clarify requirements and demonstrate capacity. As the analysis on page B-12 indicates, capacity exists for the 27 unsheltered individuals identified in the 2020 point-in-time count.</p> <p>The only zone in which ADUs are not a by-right use in association with a residential use is the Institutional-Health Care zone which, due to the nature of the zone (allowing institutional uses as the predominant uses), requires a conditional use permit for multi-family housing and planned residential development to ensure compatibility with established institutional uses such as the Loma Linda University campus, Loma Linda Medical Center, the Veterans’ Hospital, City Hall, public schools, and government offices. Single-family units are not allowed. The City’s intent is to work with Loma Linda University and the Medical Center to create a specific plan for SPA C where the zone applies to vacant properties under the control of the University and Medical Center. Within the specific plan, residential uses (including ADUs), would be a permitted by-right use. Program 1.1 has been expanded to clarify the planned requirements of the specific plan for SPA C.</p>
<p>3. Constraints:</p> <p>Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types (e.g., multifamily rental housing, mobilehomes, transitional housing). For example, the element must describe and analyze which uses are allowed and the development standards on</p>	<p>Additional discussion has been included throughout Appendix B: Constraints on Housing Production and in particular, for The Groves Specific Plan and SPA C.</p>

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<p>the MU/VHD sites, sites from the Grove Specific Plan, and Planning Area B.</p>	
<p>Local Processing and Permit Procedures: The element must describe and analyze the multifamily development and new objective design standards for all zones where RHNA sites are identified. The analysis should describe the conditional use permit requirement in I-HC zone, any special findings for project approvals, differences between major and minor precise plans, which zones will allow ministerial process pursuant to Program 3.1 and overall, how current processes are expected to be modified with the adoption of objective design standards.</p>	<p>Text has been added to further explain the recently adopted objective design standards (ODS) ordinance the I-HC zone, and precise plan requirements. Program 3.1 has been expanded to include Zoning Code amendment to clarify the applicability of the ODS in all zones that allow residential uses.</p>
<p>Measure V: The element describes Measure V on residential development, specifically minimum lot size at 7,200 sq. ft. (p.B-8 to B-9). The Housing Crisis Act of 2019 (SB 330, 2019) was signed by Governor Newsom on October 9, 2019 and became effective on January 1, 2020. The Housing Crisis Act (Gov. Code, § 66300) generally prohibits a locality from enacting a development policy, standard or condition that reduces intensity, imposes moratoriums, enforces subjective design standards or implements any provision that limits approvals or caps population. These provisions remain in effect until January 1, 2030. Specifically, Government Code section 66300, subdivision (b)(1)(D), with limited exception not applicable here, does not allow affected jurisdictions to adopt new or enforce existing limits on the number of land-use approvals or permits. The City should evaluate Measure V for consistency with these requirements. Additionally, several sites identified in the site inventory are less than 0.17 acre or 7,200 sq. ft. for moderate and above moderate-income levels which, HCD understands, cannot be developed under Measure V. The City should evaluate and add a program to address this constraint.</p>	<p>The City Attorney has reviewed Measure V in light of SB 330 and has determined that Measure V is not considered to limit approvals or cap population. Also, Measure V does not prohibit the development of parcels smaller than 7,200 square feet that existed prior to the approval of Measure V. Measure V only prohibits the creation of any new residential parcel smaller than 7,200 square feet. No additional program is required, as Measure V is not a constraint on development.</p>

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<p>Zoning, Development Standards and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards and fees for each parcel on the jurisdiction’s website.</p>	<p>All zoning requirements and development standards in Title 17 (Zoning) and for The Groves Specific Plan are available via the City’s website. Fees are posted on the website and available in print form at City Hall. This information has been added to the Housing Element.</p>
<p>Constraints on Housing for Persons with Disabilities: The element currently details that group homes serving six or less are permitted in R1, R3, R3, R4 and all HR zones (p.B-5). However, group homes serving seven or more are permitted with a conditional use permit (CUP) in R3 and R4. The element should analyze the CUP for group home facilities serving seven or more as a potential constraint on housing for persons with disabilities and add or modify programs as appropriate to ensure zoning permits group homes objectively with approval certainty.</p>	<p>Facilities that serve seven or more individuals generally are considered a commercial use of property and thus require a CUP with specified conditions. This clarification needs to be included in the Zoning Code. Program 3.1 has been expanded to include this code amendment.</p>
<p>4. Sites Inventory.</p> <p>While the element quantifies the City’s special needs populations, it must also analyze their special housing needs. For a complete analysis of each population group, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability senior housing units, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.</p>	<p>Additional analysis of local special needs populations has been added to Appendix A (Community Profile/Housing Needs Assessment). Additional discussion of available resources has been added to Appendix C under the heading Financial and Administrative Resources.</p>
<p>The element identifies one affordable housing project at risk of converting to market-rate units in the planning period (Program 4.2 p.13). If multifamily units are identified as at-risk within a ten-year period (2021–2031), the analysis of “at-risk” units must include the following (Gov. Code, § 65583, subd. (a)(9).):</p> <ul style="list-style-type: none"> • Listing of each development by project name and address 	<p>The units identified as at risk of conversion are single-family residences. No multifamily units are at risk during the next 10 years; thus, further analysis is not required.</p>

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<ul style="list-style-type: none"> • Type of governmental assistance received • Earliest date of change from low-income use; and • Total number of elderly and nonelderly units. • Estimated total cost for producing, replacing, and preserving the units at-risk. • Identification of public and private nonprofit corporations known to the City to have the legal and managerial capacity to acquire and manage at-risk units. • Identification and consideration of use of federal, state and local financing and subsidy programs. <p>C. Housing Programs</p> <p>To address the program requirements of Gov. Code section 65583, subd. (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City’s specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. All programs must be evaluated to provide discrete timing (e.g., month, year) to account for how often the action will occur as well as to ensure a beneficial impact throughout the planning period and quantify objectives where feasible. In addition, all programs must be evaluated to ensure that meaningful actions are taken. Programs containing unclear commitment (e.g., “Continue to facilitate”; “Explore”; “Consider”; “Encourage”; etc.) should be amended to include more specific and measurable actions. Finally, additional programs to be revised include the following:</p> <p><i>Program 2.1 Housing Opportunities for Special Needs Groups:</i> The program states that projects will be granted “priority” but should describe what qualified projects will have priority for and how projects will access it.</p>	<p>All programs in the element comply with requirements to identify the City’s role, timelines, objectives, and responsible parties.</p> <p>The City has revisited the time frames for implementation and made adjustments as possible. However, the City does wish to highlight two facts:</p> <ul style="list-style-type: none"> • The use of the term “continue” is appropriate for an existing program that will remain in the Housing Element and whose implementation will indeed be continued. • Loma Linda is a small city with a Planning staff of one person responsible for both current and long-range planning tasks. The ability of the department to undertake multiple programs within a short time frame is extraordinarily limited. While the City does rely upon consultants to assist with long-range planning assignments, such as zoning code updates, the one planner must manage the contract and review materials produced by a consultant. The time frames provided in the element reflect workload restrictions. <p>Language has been added regarding streamlined review.</p>

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<ul style="list-style-type: none"> • <i>Program 2.3 Affordable Housing Development:</i> Provide specific timeframes for the City to implement each action. • <i>Program 2.5 Transitional / Supportive Housing and Support Services:</i> Provide clarification on what exactly the City will revise in the definition of family. 	<p>Timeframes for each action have been added, with the recognition that City staffing resources are constrained.</p> <p>Clarification has been added.</p>
<p>As noted in Finding B2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:</p> <p><i>Program 1.1 (Adequate Sites):</i> The element relies on annexation of a large site to accommodate a portion of its RHNA for above moderate income. The element must include specific actions and dates for completion of the annexation.</p> <ul style="list-style-type: none"> • <i>Program 1.2 Accessory Dwelling Units:</i> The element must include specific commitments and actions to incentivize the production of ADU and include specific dates and actions for monitoring the development of ADU per the ADU projection assumptions in the sites inventory. 	<p>As demonstrated in the Housing Resources discussion, which has been revised per HCD’s comments, the sites inventory analysis demonstrates that the RHNA can be achieved for all income categories without any requirement to rezone properties. Thus, the only programs requiring adjustment are those made are in direct response to the specific programs HCD references, as discussed below.</p> <p>Language has been added to demonstrate the commitment to complete the annexation by 2024. The required survey map has been completed, and the Initial Study (CEQA document) will be released in early 2022. Discussions with the Local Agency Formation Commission are underway.</p> <p>Language has been added to describe the City’s electronic tracking system that identifies ADUs. More specific timeframes for program components have been added.</p>
<p>The element must include a program(s) to assist in the development of housing affordable to low-, very low- and ELI households. Programs must be revised or added to the element to assist in the development of housing for ELI households. Program actions could include prioritizing some funding for housing developments affordable to ELI households and offering financial incentives or regulatory concessions to encourage the development of housing types, such as</p>	<p>Language and program components have been added to Program 2.1 to address lower-income households.</p>

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<p>multifamily, SRO units, to address identified housing needs for ELI households.</p>	
<p>As noted in Finding(s) B3, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition: <i>Program 3.1 Target Code Updates:</i> The element should clarify which zones will be subject to the objective design standards and ministerial processing for multifamily development.</p> <p>In addition, Program 3.1 commits to allow emergency shelter “by-right” in the Commercial Manufacturing zone up to the capacity needed to address the City’s unsheltered needed. Please be aware Government Code section 65583, subd. (a)(4) states “the identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7), except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter.” Since the City’s identified emergency shelter need is 27, it is unclear that this limitation will allow at least one year-round emergency shelter to be feasibly built. If the city includes this limitation, it must demonstrate that it would not pose a constraint on the development of at least one emergency shelter.</p>	<p>See notes above regarding the constraints analysis.</p> <p>Regarding the objective design standards (ODS): The City adopted an ODS ordinance in November 2021 that complies with State law. The ordinance establishes a two-tier process that allows certainty of approval through a ministerial process for projects deemed to comply with the ODS. This applies to all multifamily developments of two or more units and mixed-use projects that are at least two-thirds residential. Amendments to the Zoning Code are required to clarify this. Policy 3.2 has been revised to reference the ODS ordinance, and the associated implementing actions have been expanded to include the need to clarify ODS applicability.</p>
<p>As noted in Finding B1, the element must include a complete analysis of affirmatively further fair housing AFFH. Based on the outcomes of that analysis, the element must add or modify programs. In addition, Program 5.1 Affirmatively Furthering Fair Housing, should include specific commitments to administer its programs and activities relating to housing and community development in a manner to AFFH</p>	<p>See the analysis on page E-30 of the element. Also, Program 5.1 has been expanded to clearly identify the AFFH issues of concern in the sites analysis, the contributing factors, and meaningful actions to be taken to address identified issues (which are few).</p>

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and take no action that is materially inconsistent with its obligation to AFFH pursuant to Government Code section 8899.50.	
<p>D. Quantified Objectives</p> <p>While the element includes program 4.1 on rental inspection, the quantified objectives do not reflect any rehabilitation need. The element must evaluate and include objectives for rehabilitation units.</p>	<p>Rehabilitation objectives have been added to reflect references the City will make to available County programs since the City does not have local funds.</p>
<p>E. Public Participation</p> <p>While the element includes a general summary of the public participation process (p. 4), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element, specifically lower-income households. The element could describe the efforts to provide translation services and to circulate the housing element among low- and moderate-income households and organizations that represent their interest and to involve such groups and persons in the element throughout the process. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the element. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml.</p> <p>In addition, HCD understands the City made the element available to the public prior to HCD’s review but recently made it available on website. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the</p>	<p>Additional information about the public engagement program, outreach to groups representing lower-income households, and how public comments are reflected in the Housing Element is now included in the Introduction chapter.</p>

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<p>document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.</p>	