

2021-2029 Housing Element

City of Redlands

December 2021

Revised Public Review Draft

Adopted (DATE)

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APPENDICES

[Appendix A: Site Inventory Map](#)

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1 INTRODUCTION

1.1 PURPOSE AND SCOPE OF THE HOUSING ELEMENT

The Housing Element, a component of the City of Redlands' General Plan, presents a comprehensive set of housing policies and actions for the years 2021–2029 (October 15, 2021–October 15, 2029). It builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production (5th Cycle Housing Element). This 6th Cycle Housing Element retains many of the goals, policies, and relevant implementation programs previously approved. Significant revisions have been limited to the Housing Needs Assessment, which contains updated statistics and analyses based on data from the 2010 US Census and the American Community Survey and a revised sites inventory to meet the Regional Housing Needs Assessment (RHNA).

1.2 STATE REQUIREMENTS

The California State Legislature has identified the attainment of a decent home and suitable living environment for every resident as the state's major housing goal. Recognizing the important role of local planning programs in pursuing this goal, the legislature has mandated that all cities and counties prepare a housing element as part of their comprehensive general plan. Government Code Section 65583 sets forth the specific components to be contained in a community's housing element.

The housing element is required by state law to include:

- An assessment of existing housing needs—with an analysis of housing affordability, conditions, special needs and affordable units at risk of converting to market rate—as well as projected needs as laid out in the RHNA;
- A detailed sites inventory and analysis that evaluates the jurisdiction's ability to accommodate its RHNA;
- An analysis of constraints on housing in the jurisdiction;
- Housing programs that identify adequate sites to accommodate the jurisdiction's share of the regional housing need; assist in the development of housing for very low- and low- income households; remove or mitigate governmental constraints to affordable housing; conserve and improve the existing affordable housing stock; promote equal housing opportunity; and preserve the at-risk units identified; and
- Quantified objectives that estimate the maximum number of units, by income level, to be constructed, rehabilitated, and conserved over the planning period of the element.

1.2.1 Changes in State Law Since Previous Update

The following items represent substantive changes to state law since the City's last Housing Element or which have been newly addressed in this 2021–2029 Housing Element.

- Assembly Bill (AB) 68, AB 587, AB 671, AB 881, and Senate Bill (SB) 13 further incentivize the development of accessory dwelling units (ADUs) through streamlined permits, reduced setback requirements, increased allowable square footage, reduced parking requirements, and reduced fees.
- AB 1763 requires jurisdictions to provide a density bonus to development projects that restrict 100 percent of their units as affordable to lower- and moderate-income households.
- AB 101 requires jurisdictions to allow “low barrier navigation centers” by-right in areas zoned for mixed uses and in nonresidential zones permitting multifamily uses, if the center meets specified requirements.
- AB 686 extends requirements for federal grantees and contractors to “affirmatively further fair housing,” including requirements in the federal Fair Housing Act, to public agencies in California. Affirmatively furthering fair housing is defined specifically as taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity by replacing segregated living patterns with truly integrated and balanced living patterns; transforming racially and ethnically concentrated areas of poverty into areas of opportunity; and fostering and maintaining compliance with civil rights and fair housing laws.
- AB 1255 and AB 1486 seek to identify and prioritize state and local surplus lands available for housing development affordable to lower-income households.
- AB 2162 and SB 2 address various methods and funding sources that jurisdictions may use to accelerate housing production. Specifically, AB 2162 requires that supportive housing be a permitted use without discretionary review, in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.
- SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels.

1.2.2 Planning Period

The State of California now requires an update of a jurisdiction’s housing element every eight years, versus every five years with prior housing element planning periods. Passage of SB 375 extended the planning period for housing elements from five years to eight years in order to align them with the regional

transportation plan (RTP) deadlines. One housing element will now be completed for every two RTPs. Thus, this Housing Element period extends from October 15, 2021, to October 15, 2029.

1.2.3 Regional Housing Needs Assessment Projection Period

A critical measure of compliance with state housing element law is the ability of a jurisdiction to accommodate its share of the region’s housing need—the “Regional Housing Needs Assessment (RHNA).” This RHNA quantifies the need for housing in each jurisdiction in a six-county area, including the City of Redlands. In November 2012, the state approved the Southern California Association of Governments’ (SCAG) RHNA plan, which covers the projection period of October 15, 2021, to October 15, 2029. Table 1.2-1 presents Redlands’ allocation of the region’s housing needs by income group as determined by SCAG.

TABLE 1-11-1: 2021–2029 RHNA PROJECTION PERIOD

| Income Group | Redlands | | SCAG Region | |
|----------------------------|--------------|-------------|------------------|-------------|
| | Number | Percent | Number | Percent |
| Very Low (<50% AMI) | 967 | 28% | 351,796 | 26% |
| Low (50-80% AMI) | 615 | 17% | 206,807 | 15% |
| Moderate (>80-120% AMI) | 652 | 19% | 223,957 | 17% |
| Above Moderate (>120% AMI) | 1282 | 36% | 559,267 | 42% |
| Total | 3,516 | 100% | 1,341,827 | 100% |

Source: SCAG 6th Cycle Regional Housing Needs Assessment Final Allocation Plan, 2021.

1.3 RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

The housing element must be consistent with the other elements in a general plan. Redlands’ first comprehensive General Plan was adopted in 1995 and has been amended numerous times since then. The Housing Element has been comprehensively updated as part of the SCAG cycles. A comprehensive update of the General Plan was adopted in December 2017. This General Plan update provides a planned blueprint for the City through the year 2035. This Housing Element is consistent with the other elements in the City’s current 2035 General Plan.

Redlands recently conducted a comprehensive update to the General Plan in 2017. During the 2017 update, each element was updated to match existing conditions, reflect community input, and comply with recent changes to state laws.

The Housing Element will necessitate future amendments to other elements of the General Plan, in particular, the Land Use Element, the Healthy Community Element, and the creation of a new Environmental Justice Element. Throughout the planning period, City staff will continue to review any future amendments to ensure they are internally consistent with the Housing Element.

1.3.1 Livable Community Element

The Livable Community Element acts as the City's Land-Use Element for the purposes of designating the distribution and intensity of land. When the required rezoning is conducted to accommodate the City's RHNA, the Livable Community Element will be updated to match the final land-use designations. The revised land-use element will reflect the City's rezoning to accommodate the RHNA and will also be amended to add the Transit Villages Specific Plan as a land-use designation. Additionally, the element will be updated to identify any disadvantaged "Fringe" communities, pursuant to SB 244, which are currently not defined in the General Plan. Redlands has one "disadvantaged

1.3.2 Healthy Community Element

The Healthy Community Element meets the Government Code requirements for a Safety Element. As this element has been recently updated, there are no immediate changes that are required. Upon adoption of the Housing Element, the City will the required update to the Healthy Community Element, as required by the Government Code.

1.3.3 Environmental Justice Element

Pursuant to Senate Bill 1000, jurisdictions that have "disadvantaged communities" must adopt a new Environmental Justice Element upon the update of two or more elements of the General Plan.

Upon the adoption of two or more General Plan element updates, the City will be required include an Environmental Justice Element to address the needs and health of "disadvantaged communities," as defined in the state government code. Redlands has multiple tracts that would meet the definition of a disadvantaged community and will thus be required to adopt amendments to the general plan addressing the needs of central and western Redlands.

1.4 INFORMATION SOURCES

The information for this Housing Element update came from a variety of sources. These include the US Census (2010), the American Community Survey (2018 and 2019), the California Department of Finance, the California Housing Partnership Corporation, Southern California Association of Governments Pre-Certified Housing Data- and various City databases.

1.5 PUBLIC OUTREACH

The City of Redlands made a diligent effort to encourage public participation in the development of the Housing Element. Outreach for the Housing Element update began in February 2021. This involved engaging community members, stakeholders, service providers, educators, and the City's Planning Commission and City Council in identification of housing issues and involved a diversity of people in Redlands in the planning process. The public participation program included:

- An interactive housing element update website launched on February 12, 2021 linked on the City's webpage that included a description of the project, the City's RHNA allocation, English and Spanish versions of the Housing Needs Survey, an interactive webmap of Draft RHNA sites, and

contact information and mailing list sign up. A link to the Housing Element webpage was also linked on the front page of the City's website.

- A mailing list registration link for interested parties
- An online community survey offered in English and Spanish. The city heavily promoted the surveys through repeated social media postings, email list notifications, project website, Redlands TV station.
- Press releases through the City's Public Information Officer that included the web link to the Housing Element Update website, links to the English and Spanish versions of the Housing Needs survey, as well as project planner's contact information. City also posted the project information on social media platforms. Project planner sent an email to stakeholders and service clubs in the City about the website and the Housing Needs survey. City re-posted the post every week for three weeks. Information was also made available on the City's TV station and replayed for about four months.
- Two virtual community workshops. The website was updated to include information about the community meetings on 4/26/21 and 5/13/21. Physical flyers were posted on posting locations. Display ad was run twice on Redlands Daily Facts to advertise the community meetings. Multiple social media postings about the community meetings on 4/26/21 and 5/13/21 were made on the City's social media platforms. Project planner sent emails to notify individuals on the mailing list which includes stakeholders, service clubs, and others who requested to join the mailing list.
- Two study sessions with the Planning Commission and additional updates to the Planning Commission held during public hearings. All of the efforts (excluding display ad on newspaper) of notifying the public that were made for the two community meetings were repeated for the City Council study session. The links to the staff report, PowerPoint presentation, and video recording were posted on the Housing Element Update website a day after the study session. Emails were sent to the Housing Element Update mailing list prior to the study session with links to all the materials, and a follow up email was sent to announce that the video has been posted.
- One study session with the City Council. All of the efforts (excluding display ad on newspaper) of notifying the public that were made for the two community meetings were repeated for the Planning Commission study session. The links to the staff report, PowerPoint presentation, and video recording were posted on the Housing Element Update website a day after the study session. Emails were sent to the Housing Element Update mailing list prior to the study session with links to all the materials, and a follow up email was sent to announce that the video has been posted.
- Fair Housing focus interviews. In September of 2021 a focus survey regarding fair housing was sent to local service providers and stake holders. The City has made repeated efforts by email and phone to ask service providers and stakeholders to complete the survey.

- Publishing of the draft Housing Element. One week prior to the initial submittal to HCD, the City posted the Draft Housing Element on the City's website and notified the public of the availability of the document via social media posts, email notifications to stakeholders, service clubs, and individuals on the mailing list. The draft Housing Element has remained on the website since then. This redline draft will be posted on December 21, 2021 along with HCD's November 14th comment letter.

The City heard comments ranging from concerns over affordability, burdens on developers, burdens on service providers, homelessness, access to transit and services, and preference on location of future housing. Many of the programs proposed in this housing element update reflect these topics. The full summary of community engagement activities and outcomes of outreach and survey results are included in Appendix C.

Throughout the project process, the Housing Element Update website has been updated and expanded frequently. The website contains the project description, RHNA information, past events (including all workshops and study sessions, staff reports, videos, etc.), upcoming events, the RHNA sites interactive webmap, project timeline, the Draft Housing Element document and all the appendices, contact information, and links to other resources to assist the public in understanding Housing Element and RHNA.

It should be noted that due to the pandemic, City Hall was closed to all in-person services from March 2020 until May 2021. In-person public meetings did not resume until July 6, 2021.

For upcoming Public Hearings for the adoption of the 6th Cycle Housing Element, the City will do the following prior to the hearing date:

1. Announcement on project website
2. Multiple social media postings
3. Display ad in local newspaper
4. Physical postings of meeting notices
5. Meeting notices available at the planning counter
6. Notify service clubs, stakeholder groups, and interested individuals via the mailing list
7. Slide running on Redlands TV
8. Press release

1.6 DOCUMENT ORGANIZATION

Following this introduction, the Redlands Housing Element is organized into the following chapters:

- **Chapter 2, Housing Needs Assessment, Regional Housing Needs Assessment and Special Needs** describes Redlands' demographic and employment trends, characteristics of the City's current housing stock, housing affordability, and energy conservation opportunities. The Regional Housing Needs Assessment and Special Needs section explains Redlands' allocation of the regional housing need, projects housing needs, and describes the characteristics and needs of

various special populations, including the elderly, people with disabilities, homeless, and single parents

- **Chapter 3, Housing Resources and Sites Inventory**, identifies specific sites suitable for residential development to allow for a comparison of the RHNA with realistic development capacity. Environmental and infrastructure constraints on potential housing sites are also described.
- **Chapter 4, Constraints**, identifies and analyzes potential and actual constraints to housing development in Redlands, both related to governmental actions (e.g., regulatory standards) and non-governmental conditions (e.g., the housing market or construction costs).
- **Chapter 5, Quantified Objectives, Housing Goals, Policies, and Programs**, includes the goals, objectives, policies, and programs for this Housing Element planning period.
- **Chapter 6, Review of Past Accomplishments**, describes the City's accomplishments and provides an assessment of the effectiveness of the programs in the prior 5th Cycle Housing Element.
- **Chapter 7, Affirmatively Furthering Fair Housing**, includes an analysis of Fair Housing, contributing factors to housing problems, and action items to address them.

Appendices cover the topics of community engagement, sites inventory map, and sites inventory data.

2 HOUSING NEEDS ASSESSMENT

This section of the Housing Element consists of an analysis of demographic, economic, employment, and housing data that help identify and illustrate the housing needs in the City of Redlands. Numerous data sources were used in updating the City's Housing Element. The key data sources include:

- Census and American Community Survey (ACS) – 2019 5-year estimates
- Southern California Association of Governments pre-certified housing data
- California Department of Finance Population and Housing Estimates
- Employment Development Department, Labor Market Statistics
- US Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data
- California Department of Housing and Community Development (HCD)

2.1 POPULATION AND DEMOGRAPHICS

2.1.1 Population Growth

Since incorporation in 1888, Redlands has consistently grown over several decades, along with the surrounding areas of San Bernardino County. As shown in Table 2.1-1, Redlands' population grew by steady double digits each decade through most of the twentieth century and has more than tripled since 1950. This rapid growth coincides with the conversion of former citrus groves to residential and other uses and, in turn, a shift in the economic base of the community from predominantly agricultural to service-related industries. Noteworthy, Redlands population growth slowed to single digits since 2000. As of ~~2020~~2019, Redlands' population was estimated to be ~~73,168~~71,198.

TABLE 2-1: REDLANDS POPULATION SINCE INCORPORATION 1888-2020

| Year | Population | Percent Increase |
|-------------------|----------------------|------------------|
| 1888 ¹ | 1,000 | N/A |
| 1900 | 4,797 | 379.7% |
| 1910 | 10,440 | 117.6% |
| 1920 | 9,874 | -5.4% |
| 1930 | 14,162 | 43.4% |
| 1940 | 14,324 | 1.1% |
| 1950 | 18,429 | 28.7% |
| 1960 | 26,829 | 45.6% |
| 1970 | 36,355 | 35.5% |
| 1980 | 43,619 | 20.0% |
| 1990 | 60,394 | 38.5% |
| 2000 | 63,591 | 5.3% |
| 2010 | 68,747 | 8.1% |
| 2019-2020 | 73,168-71,198 | 6.43-5% |

1. Date of Incorporation for City of Redlands.

Sources: U.S. Census, each decade; ACS 2019 American Community Survey

Table 2.1-2 compares recent population growth in Redlands and San Bernardino County since 1990. Overall, the County's population growth rate has exceeded that of the City, due primarily to its larger scale and amount of developable land. By 2045, SCAG projects that Redlands' population will grow to 80,800, a 13 percent increase between today and 2045 (i.e., an annual population growth rate of 0.5% per year, on average).

TABLE 2-2: CITY AND COUNTY POPULATION TRENDS 1990-2019

| Jurisdiction | 1990 | 2000 | Percent Increase 1990- 2000 2010 | 2010 | Percent Increase 2000- 2010 | 2020 | Percent Increase 2010- 2020 2019 |
|-----------------------|-----------|-----------|---|-----------|-----------------------------------|------------------------------|---|
| City of Redlands | 60,394 | 63,591 | 5.3% | 68,747 | 8.1% | 73,168 71,198 | 6.43 -5% |
| San Bernardino County | 1,418,380 | 1,709,648 | 20.5% | 2,035,210 | 19.0% | 2,181,654 149,031 | 7.25 -6% |

Sources: 1990, 2000, and 2010 U.S. Census; 2014-2019 American Community Survey, SCAG pre-certified Housing Data

2.1.2 Race and Ethnicity

Table 2.1-3 shows that the racial and ethnic characteristics of Redlands has changed significantly since 2010, with the percentage of Whites and Asians increasing as a proportion of the population, with American Indians/Alaskan Natives, Black/African Americans, Native Hawaiians/Other Pacific Islanders,

those of Hispanic/Latino of any race and those of Two or More Races and Others declining as a proportion of the population.

Today, Whites comprise a majority (72.5%) of Redlands' population, whereas this group represents 61.2 percent of the San Bernardino County population. Compared to Redlands, the County also has a higher percentage of Blacks/African Americans (8.3% vs. 5.4%) and those identifying as other races (17.5% vs. 7.5%). More significantly, over half (53.3%) of the County's population is Hispanic/Latino compared to 32.7 percent in Redlands. Not only did the percentage of American Indian/Alaskan Native, Native Hawaiian/Other Pacific Islander, and Other decrease as a percent of the total City population, but the actual number of persons decreased between 2010 and 2019.

TABLE 2-32-3: REDLANDS RACE & ETHNICITY, 2010 AND 2019

| Race/Ethnicity | Redlands, 2010 | | Redlands, 2019 | | San Bernardino County, 2019 | |
|---|----------------|---------------|----------------|---------------|-----------------------------|-------------|
| | Number | Percent | Number | Percent | Number | Percent |
| American Indian /Alaskan Native | 625 | 0.9% | 332 | 0.47% | 17,782 | 0.83% |
| Asian | 5,216 | 7.6% | 5,729 | 8.05% | 154,332 | 7.18% |
| Black/African American | 3,564 | 5.2% | 3,870 | 5.44% | 179,292 | 8.34% |
| Native Hawaiian/ Other Pacific Islander | 235 | 0.3% | 147 | 0.21% | 6,838 | 0.32% |
| White | 47,452 | 69.0% | 51,653 | 72.55% | 1,315,238 | 61.20% |
| Other | 8,266 | 12.0% | 5,346 | 7.51% | 368,600 | 17.15% |
| Two or More Races | 3,389 | 4.9% | 4,121 | 5.79% | 106,949 | 4.98% |
| Total | 68,747 | 100.0% | 71,198 | 100.0% | 2,149,021 | 100% |
| Hispanic/Latino ¹ | 20,810 | 30.3% | 23,261 | 32.67% | 1,145,874 | 53.32% |

1. Persons of Hispanic/Latino ethnicity may be of any race.

Sources: 2010 U.S. Census. 2014-2019 American Community Survey, SCAG pre-certified Housing Data

2.1.3 Age Characteristics

Between 2010 and 2019 the population percentage for most age groups shifted, with the later age ranges such those aged 55+ experiencing the greatest growth. In 2010, these groups accounted for approximately 25 percent of the population, while in 2020 they accounted for almost 30 percent of Redlands' population. A few age groups saw slight declines in population—school-age (5-19) and most young adult populations—while the senior population in Redlands grew the most.

Overall, the median age of the City's population increased between 2010 and 2019 (to 37.2 from 36.1 years old). Whether the City's population will get older on average depends, in part, on the desire of current residents to remain in the City as they age and the availability of housing and support services that meet their changing needs.

TABLE 2-42-4: REDLANDS POPULATION AGE CHARACTERISTICS 2010 AND 2019

| Age Range | 2010 | | 2019 | |
|--------------|---------------|---------------|---------------|---------------|
| | Number | Percent | Number | Percent |
| 0-4 | 4,143 | 6.0% | 4,827 | 6.8% |
| 5-14 | 8,987 | 13.1% | 8,101 | 11.4% |
| 15-19 | 5,624 | 8.2% | 4,969 | 7.0% |
| 20-24 | 5,704 | 8.3% | 5,136 | 7.2% |
| 25-34 | 8,910 | 13.0% | 10,635 | 14.9% |
| 35-44 | 8,471 | 12.3% | 8,856 | 12.4% |
| 45-54 | 9,636 | 14.0% | 7,945 | 11.2% |
| 55-64 | 8,294 | 12.1% | 9,510 | 13.4% |
| 65 + | 8,978 | 13.1% | 11,219 | 15.8% |
| Total | 68,747 | 100.0% | 71,198 | 100.0% |
| Median Age | 36.2 | | 37.2 | |

Sources: 2010 U.S. Census. American Community Survey 2014-2019 5 Year Estimates

2.1.4 Educational Attainment

As of 2011, about 9 in 10 (90%) Redlands residents age 25 and older had graduated from high school and just under 4 in 10 (37%) had a bachelor's degree or higher. These rates of educational attainment were much higher than in San Bernardino County as a whole, where 78 percent were at least high school graduates and 19 percent had a bachelor's degree or higher.

As of 2019, almost 9 in 10 (88.9%) Redlands residents age 25 and older had graduated from high school, and 38 percent had a bachelor's degree or higher. These rates of educational attainment are much higher than in San Bernardino County as a whole, where 86 percent were at least high school graduates and 20 percent had a bachelor's degree or higher. These educational attainment statistics are shown in Table 2.1-5.

TABLE 2-52-5: EDUCATIONAL ATTAINMENT IN REDLANDS AND SAN BERNARDINO COUNTY, 2011 AND 2019

| Education Received | Redlands, 2011 | | Redlands, 2019 | | San Bernardino County, 2019 | |
|--------------------------------|----------------|---------------|----------------|---------------|-----------------------------|---------------|
| | Number | Percent | Number | Percent | Number | Percent |
| Less than 9th Grade | 1,816 | 4.2% | 1,750 | 3.6% | 119,589 | 8.9% |
| 9th-12th Grade, no diploma | 2,637 | 6.1% | 3,644 | 7.6% | 150,652 | 11.2% |
| High School Graduate | 8,473 | 19.6% | 8,656 | 18.0% | 355,250 | 26.3% |
| Some College, No Degree | 10,246 | 23.7% | 9,734 | 20.2% | 329,045 | 24.4% |
| Associate's Degree | 3,977 | 9.2% | 4,252 | 8.8% | 112,600 | 8.3% |
| Bachelor's Degree | 8,560 | 19.8% | 10,892 | 22.6% | 183,593 | 13.6% |
| Graduate/Professional Degree | 7,522 | 17.4% | 9,237 | 19.2% | 99,891 | 7.4% |
| Total, Age 25 and Older | 43,231 | 100.0% | 46,852 | 100.0% | 1,331,752 | 100.0% |
| High School Graduate or Higher | 38,778 | 89.7% | 42,771 | 88.8 | 1,080,379 | 80.0 |
| Bachelor's Degree or Higher | 16,082 | 37.2% | 20,129 | 41.8 | 283,484 | 21.0 |

Sources: 2007-2011 and 2014-2019 American Community Survey.

2.1.5 School Enrollment

Total school enrollment in Redlands in 2011 was 22,223, including both public and private schools. Nursery and pre-schools accounted for 6 percent of the total, kindergartens about 4 percent, elementary/middle schools about 34 percent, high schools about 22 percent and colleges and graduate schools about 34 percent (Redlands is home to the University of Redlands, a four-year liberal arts university).

Total school enrollment in Redlands in 2019 was 19,934, including both public and private schools. Nursery and preschools accounted for 5.2 percent of the total, kindergartens about 4.4 percent, elementary/middle schools about 34 percent, high schools about 19 percent and colleges and graduate schools about 37.5 percent. ~~(Redlands is home to the University of Redlands, a four-year liberal arts university).~~ By comparison, as shown in Table 2.1-6, the County as a whole had somewhat lower percentages in nursery and preschools (about 5.2%) and in college or graduate schools (26.8%), but somewhat higher percentages in kindergartens (5.0%) in elementary/middle schools (40.7%), and in high schools (22.6%).

TABLE 2-62-6: SCHOOL ENROLLMENT IN REDLANDS AND SAN BERNARDINO COUNTY, 2011 AND 2019

| School Level | Redlands, 2011 | | Redlands, 2019 | | San Bernardino County, 2019 | |
|--|----------------|---------|----------------|---------|-----------------------------|---------|
| | Number | Percent | Number | Percent | Number | Percent |
| Nursery/Pre-School | 1,274 | 5.7% | 1,241 | 6.5% | 31,894 | 5.2% |
| Kindergarten | 905 | 4.1% | 560 | 2.9% | 30,571 | 5.0% |
| Elementary School (grades 1-8) | 7,626 | 34.3% | 6,183 | 32.3% | 251,521 | 40.7% |
| High School (grades 9-12) | 4,781 | 21.5% | 3,798 | 19.8% | 138,712 | 22.5% |
| College or Graduate School | 7,637 | 34.4% | 7,360 | 38.4% | 164,670 | 26.7% |
| Population Age 3 or Older and Enrolled in School | 22,223 | 100.0% | 19,142 | 100.0% | 617,368 | 100.0% |

Sources: 2007-2011 and 2014-2019 American Community Survey.

2.1.6 Population Stability

Table shows that about 88% of the population in Redlands occupied the same house one year ago, and about 12% moved to Redlands from another location during the same time period. Of the in-movers from elsewhere in the U.S., over half (6.7%) moved from another location within San Bernardino County, about one-third (3.4%) moved from somewhere else in California, and the remainder (1.6%) moved from another part of the U.S. Less than half of one percent moved from outside the U.S. In San Bernardino County as a whole, a slightly lower proportion remained in the same house (86.7%), and a larger percentage relocated from elsewhere in California (4%).

TABLE 2-72-7: RESIDENCE 1 YEAR AGO FOR REDLANDS AND SAN BERNARDINO COUNTY, 2019

| Location of Residence 1 Year ago | Redlands, 2019 | | San Bernardino County, 2019 | |
|-------------------------------------|----------------|--------------|-----------------------------|--------------|
| | Number | Percent | Number | Percent |
| Same House | 62,130 | 88.1% | 1,842,497 | 86.7% |
| Same County | 4,727 | 6.7% | 159,806 | 7.5% |
| Same State | 2,375 | 3.4% | 85,122 | 4.0% |
| Different State | 1,097 | 1.6% | 25,375 | 1.2% |
| Elsewhere (outside U.S.) | 203 | 0.3% | 9,537 | 0.5% |
| Total | 70,532 | 100.0 | 2,122,337 | 100.0 |

Source: 2014-2019 American Community Survey.

2.2 HOUSEHOLD AND FAMILY TYPES

2.2.1 Household Types

In 2019, there were 24,542⁷ households in Redlands, compared to 24,764 households in 2010, representing a 1 percent decrease, as shown in Table . Families made up over three-quarters of Redlands'

households in 2019, greater than the percentage as in 2010 (68.9%). “Families” include married couples (50% of households in 2019) and other family types, such as single parents with children (19% of households in 2019).

Non-family households accounted for slightly less than one-third of all households in the City in 2019. Most of the non-family households were single-person households (23.7% of all households) and about 6.5% were households with more than one person in which the household members were unrelated to one another (e.g., college students living with roommates). In the County as a whole in 2019, there was a larger percentage of family households (76%) and a smaller percentage of single-person households (18.7%).

About one third (32.7%) of Redlands households included people age 18 or younger and about 30.9 percent included some age 65 or older. In the County, the corresponding percentages were 42.6% (children) and 26.1% (seniors).

Between 2016 and 2045, SCAG projects that the number of households in Redlands will grow from 24,400 to 30,800 (a 26% increase), which is slightly lower than the County’s overall projected household growth of 39%.

TABLE 2-82-8: HOUSEHOLD COMPOSITION IN REDLANDS AND SAN BERNARDINO COUNTY, 2010 AND 2019

| Household Type | Redlands, 2010 | | Redlands, 2019 | | County, 2019 | |
|---------------------------------|----------------|---------------|----------------|---------------|----------------|---------------|
| | Number | Percent | Number | Percent | Number | Percent |
| Families | 17,062 | 68.9% | 18,541 | 75.55% | 517,360 | 81.34% |
| Married Couple | 12,374 | 50.0% | 12,643 | 51.52% | 331,235 | 52.08% |
| Other Families | 4,688 | 18.9% | 5,898 | 24.03% | 44,558 | 7.01% |
| Non-Family Households | 7,702 | 31.1% | 9,150 | 37.28% | 208,016 | 32.70% |
| Living Alone | 6,083 | 24.6% | 6,001 | 24.45% | 118,681 | 18.66% |
| Other Non-Family Households | 1,619 | 6.5% | 3,149 | 12.83% | 89,335 | 14.05% |
| Households with Children <18 | 8,598 | 34.7% | 7,938 | 32.34% | 266,636 | 41.92% |
| Households with Individuals 65+ | 6,223 | 25.1% | 7,640 | 31.13% | 171,073 | 26.90% |
| Total Households | 24,764 | 100.0% | 24,542 | 100.0% | 636,041 | 100.0% |
| Average Household Size | 2.68 | | 2.79 | | 3.29 | |
| Average Family Size | 3.21 | | 3.36 | | 3.76 | |

Sources: 2010 U.S. Census and 2014-2019 American Community Survey.

2.2.2 Household and Family Sizes

As also shown in Table , the average non-family household size in Redlands was 2.68 persons in 2010, compared to the higher average of 2.81 persons in 2019. By comparison, the average household size in San Bernardino County in 2019 was 3.30 persons.

2.3 EMPLOYMENT CHARACTERISTICS

2.3.1 Labor Force Size and Distribution

The City’s “labor force” is the number of residents who are age 16 or older who are employed or unemployed but actively seeking work. They include residents who may be employed in Redlands or elsewhere. The members of the labor force who are employed in non-military jobs are referred to as the “civilian labor force.”

Table summarizes the Redlands and San Bernardino County labor force characteristics. It shows that the City had slightly less labor force participation rate in 2019 (59%) as the County as a whole (60.7%), and that the City had all of its labor force in the civilian sector rather than in the military. About 3.5% of the City’s civilian labor force was unemployed as of 2019. Females accounted for 28% of the City’s labor force, slightly more than the County’s female labor force (27.6%).

TABLE 2-92-9: LABOR FORCE CHARACTERISTICS IN REDLANDS AND SAN BERNARDINO COUNTY, 2011 AND 2019

| | Redlands, 2011 | | Redlands, 2019 | | San Bernardino County, 2019 | |
|-------------------------------|----------------|---------------|----------------|----------------|-----------------------------|----------------|
| | Number | Percent | Number | Percent | Number | Percent |
| In the Labor Force | 34,518 | 64.1% | 34,592 | 60.22% | 1,001,647 | 61.51% |
| Civilian Labor Force | 34,439 | 63.9% | 34,581 | 60.20% | 990,400 | 60.81% |
| Employed | 31,403 | 58.3% | 32,554 | 56.68% | 914,514 | 56.15% |
| Unemployed | 3,036 | 5.6% | 2,027 | 3.53% | 75,886 | 4.66% |
| Armed Forces Employment | 79 | 0.1% | 11 | 0.02% | 11,247 | 0.69% |
| Not in the Labor Force | 19,364 | 35.9% | 22,847 | 39.78% | 641,203 | 39.37% |
| Total Age 16 and Older | 53,882 | 100.0% | 57,439 | 100.00% | 1,628,558 | 100.00% |
| Females in the Labor Force | 16,508 | 30.6% | 16,884 | 29.39% | 455,075 | 27.94% |
| Female Civilian Labor Force | 16,476 | 30.6% | 16,873 | 29.38% | 454,451 | 27.91% |
| Employed | 15,059 | 27.9% | 16,040 | 27.93% | 418,515 | 25.70% |
| Unemployed | 1,417 | 2.6% | 833 | 1.45% | 35,936 | 2.21% |

Sources: 2010 U.S. Census; 2014-2019 American Community Survey

2.3.2 Civilian Employment Profile

The occupational profile of the City’s civilian labor force is significantly different from the County labor force, as shown in Table . For example, about 45% of employed residents in Redlands work in management, professional and related occupations, about 21% in sales and office occupations, and about 16% in services occupations. In the County, the top three occupations are management, professional and related (31%), sales and office (22%), and service occupations (18%). Redlands also has a larger percentage of its civilian labor force employed in the public sector (25.1%), and thus a smaller percentage of private wage earners than in the County as a whole. Redlands’ labor force is more heavily concentrated in the

education, ~~health~~health, and social science sectors of the economy (34.2%) than is the County's labor force (22.1%). On the other hand, the County has larger percentages of its civilian labor force in retail trade (12.9%), manufacturing (8.8%), construction (7.6%), and transportation and warehousing (9.6%) than does the City.

**TABLE 2-102-10: CIVILIAN LABOR FORCE EMPLOYMENT CHARACTERISTICS IN REDLANDS
AND SAN BERNARDINO COUNTY, 2010 AND 2019**

| Characteristics | Redlands, 2010 | | Redlands, 2019 | | San Bernardino County, 2019 | |
|-----------------------------------|-------------------|---------------|-------------------|----------------|--------------------------------|----------------|
| | Number | Percent | Number | Percent | Number | Percent |
| Occupations | | | | | | |
| Mgmt., Professional, & Related | 14,025 | 44.7% | 15,441 | 47.43% | 269,769 | 29.50% |
| Service Occupations | 5,053 | 16.1% | 5,269 | 16.19% | 170,014 | 18.59% |
| Sales and Office | 7,938 | 25.3% | 6,451 | 19.82% | 209,911 | 22.95% |
| Construction/Maintenance | 2,185 | 7.0% | 2,136 | 6.56% | 93,112 | 10.18% |
| Production and Transportation | 2,202 | 7.0% | 3,257 | 10.00% | 171,708 | 18.78% |
| Total Civilian Labor Force | 31,403 | 100.0% | 32,554 | 100.00% | 914,514 | 100.00% |
| Class of Worker | | | | | | |
| Private Wage & Salary Workers | 21,907 | 69.8% | 23,867 | 73.32% | 710,194 | 77.66% |
| Government Workers | 7,220 | 23.0% | 6,739 | 20.70% | 145,087 | 15.86% |
| Self-employed Workers | 2,264 | 7.2% | 1,939 | 5.96% | 57,817 | 6.32% |
| Unpaid Family Workers | 12 | 0.0% | 9 | 0.03% | 1,416 | 0.15% |
| Industry Sector | | | | | | |
| Agriculture, Forestry & Fishing | 176 | 0.6% | 128 | 0.39% | 6,472 | 0.71% |
| Construction | 1,978 | 6.3% | 1,662 | 5.11% | 68,852 | 7.53% |
| Manufacturing | 1,885 | 6.0% | 1,770 | 5.44% | 77,595 | 8.48% |
| Wholesale Trade | 613 | 2.0% | 606 | 1.86% | 30,425 | 3.33% |
| Retail Trade | 3,335 | 10.6% | 3,689 | 11.33% | 117,137 | 12.81% |
| Transportation & Warehousing | 1,504 | 4.8% | 1,901 | 5.84% | 92,078 | 10.07% |
| Information | 569 | 1.8% | 240 | 0.74% | 11,123 | |
| Finance, Insurance, etc. | 1,443 | 4.6% | 1,772 | 5.44% | 42,448 | 4.64% |
| Professional, Scientific, etc. | 3,254 | 10.4% | 3,465 | 10.64% | 87,366 | 9.55% |
| Education, Health & Soc. Services | 10,466 | 33.3% | 11,335 | 34.82% | 200,674 | 21.94% |
| Arts, Entertainment, Recreation | 2,746 | 8.7% | 2,602 | 7.99% | 84,646 | 9.26% |
| Other Services | 1,247 | 4.0% | 1,557 | 4.78% | 46,773 | 5.11% |
| Public Administration | 2,187 | 7.0% | 1,827 | 5.61% | 48,925 | 5.35% |

Sources: 2010 U.S. Census; 2019 5-year estimates using groupings of 2-digit NAICS codes

According to the 2017 U.S. Census LODES Data, the top 10 locations for residents of the City of Redlands to work was Redlands itself, then the cities of San Bernardino, Loma Linda, Riverside, Los Angeles, Colton,

Fontana, Ontario, Yucaipa, and Moreno Valley. About 22.5% of Redlands residents worked in the City of Redlands, while 77.5% commuted to other places.

TABLE 2-112-11: REDLANDS WORKERS JOB LOCATIONS, 2016

| | Place of Work | Redlands, 2016 | |
|----|------------------------|----------------|---------|
| | | Number | Percent |
| 1 | Redlands | 6,134 | 22.5% |
| 2 | San Bernardino | 4,172 | 15.3% |
| 3 | Loma Linda | 2,041 | 7.5% |
| 4 | Riverside | 1,534 | 5.6% |
| 5 | Los Angeles | 1,024 | 3.8% |
| 6 | Colton | 667 | 2.4% |
| 7 | Fontana | 608 | 2.2% |
| 8 | Ontario | 518 | 1.9% |
| 9 | Yucaipa | 500 | 1.8% |
| 10 | Moreno Valley | 473 | 1.7% |
| | All Other Destinations | 9,626 | 35.3% |

Sources: U.S. Census Bureau, 2017, LODES Data; Longitudinal-Employer Household Dynamics Program: <https://lehd.ces.census.gov/data/lodes/>

2.4 INCOME AND HOUSING COSTS

Affordable housing is key to the economic, social, and cultural vitality of any city. Therefore, one of the principal purposes of the Housing Element is to provide a picture of housing affordability for households of all income levels. It is important to distinguish between the cost of rental versus ownership housing in determining where the greatest housing need exists.

The U.S. Census Bureau is this Housing Element’s primary source of data on household income as well as other characteristics relating to housing, such as rental vs. ownership, deficiencies, and length of residence. The last Census occurred in 2010 and the next was completed in 2020. The decennial census counts all residents in the United States and asks short questions pertaining to residents’ age, sex, race, ethnicity, relationship, and household tenure. Prior to the 2010 Census, a “long form” asking more detailed questions on a wide range of demographic and housing-related topics, was also distributed to a percentage of the population.

The Census Bureau began the American Community Survey (ACS) in 1996 as a way of providing communities with more detailed information in years when the census is not taken. However, starting in 2010, the Census Bureau eliminated the more detailed “long form” component of the census and moved these questions entirely to the ACS. Today the survey is conducted in all U.S. communities, sent to a small percentage of the population on a rotating basis. One-year estimates are available for all communities with populations greater than 65,000; these are the most current data, but also the least reliable due to smaller sample sizes. Three-year estimates are available for all communities with populations greater than

20,000. Five-year estimates are available for communities of any population; these data are the least current, but the most reliable. Unlike the decennial census, the ACS does not survey every household and therefore provides estimates instead of total counts. However, its large sample size—three million households—provides statistically valid results.

2.4.1 Income

2.4.1.1 Household Income

Median household income represents the mid-point in income for all households in the City, with half earning more and half earning less. According to the 2000 U.S. Census, the median household income for the City of Redlands in 1999 was \$48,155. In comparison, San Bernardino County had an overall median household income of \$42,066, meaning that the median household income in Redlands was 14% higher. According to the 2019 ACS, the median household income in Redlands was \$74,839. In comparison, in 2019, the County had an overall median household income of \$63,362, meaning Redlands is, on average, wealthier than the County.

To determine eligibility for housing programs, both federal and state governments categorize households according to their income, in comparison to the Area Median Income (AMI). The AMI is the median household income for a defined geographic area. AMI is determined by the U.S. Department of Housing and Urban Development (HUD). The following income groups are the standard categories used:

- Extremely low-income = 30 percent median or less;
- Very low-income = 31 to 50 percent;
- Low-income = 51 to 80 percent;
- Moderate-income = 81 to 120 percent; and
- Above moderate-income = 120 and over.

California only began requesting analysis of households defined as extremely low-income since the fourth-cycle Housing Element. While a city is not obligated to include a separate category of sites designated for extremely low-income households in its suitable sites inventory, the Housing Element as a whole must analyze the obstacles and needs for this category and include proposed actions and programs to meet those needs.

Table shows the percent of City and County residents by income category. Within Redlands, the U.S. Office of Policy Development and Research (PD&R) estimated there were 2,695 extremely low-income households (11% of the total), 2,185 very low-income households (9%), 2,750 low-income households (12%), 3,680 moderate-income households (15%) and 12,625 above moderate-income households (53%). In comparison, the County had a higher proportion of extremely low- to low-income residents (41%) and a lower proportion of above moderate income residents (39%) than the City (32% and 53%, respectively).

TABLE 2-122-12: HOUSEHOLDS BY INCOME GROUP

| Income Group | Income Criteria | Redlands | San Bernardino County |
|----------------|---------------------|----------|-----------------------|
| Extremely low | Less than \$26,200 | 2,695 | 80,790 |
| | | 11.3% | 13.0% |
| Very low | \$26,200 - \$37,650 | 2,185 | 73,660 |
| | | 9.1% | 11.8% |
| Low | \$37,650 - \$60,250 | 2,750 | 102,005 |
| | | 11.5% | 16.4% |
| Moderate | \$60,250 - \$90,350 | 3,680 | 124,450 |
| | | 15.4% | 20.0% |
| Above Moderate | Over \$90,350 | 12,625 | 242,735 |
| | | 52.7% | 38.9% |
| Total | -- | 23,940 | 623,640 |
| | | 100% | 100% |

Note: The moderate and above moderate income levels were extrapolated based upon the median income for each jurisdiction given with OPR CHAS data's income brackets and total households and may not correspond exactly with values given in the American Community Survey.

Source: 2006-2017 OPR CHAS data.

Income distribution data provided by the Southern California Association of Governments (SCAG) Regional Housing Needs Allocation (RHNA) calculator provides very similar data outcomes, though structured differently. The SCAG data does not have a separate category for extremely low income, rather, the income levels defined in the calculator are Very Low Income, Low Income, Moderate Income, and Above Moderate income. In Redlands, the income distribution using SCAG RHNA calculator data is shown below.

- Very Low Income – 21%
- Low Income – 13%
- Moderate Income – 16%
- Above Moderate Income – 50%

2.4.2 Limits for Housing Assistance

The California Office of Housing and Community Development releases income limits for every county in the state. The limits correspond to the income categories introduced above, categorized by ranges of household income. State income limits are updated based on HUD updating its Sections 8 income limit levels and are adjusted to reflect the following: (1) adjustments to HUD county median income, (2) adjustments to reflect HCDs Hold Harmless Policy to maintain income category and AMI levels at their highest, and (3) calculation of California's moderate-income household levels.

Income limits for San Bernardino County as of 2021 are shown in Table .

TABLE 2-132-13: HCD INCOME LIMITS FOR SAN BERNARDINO COUNTY

| | | 1 person | 2 person | 3 person | 4 person | 5 person | 6 person | 7 person | 8 person |
|--|----------------------|----------|----------|----------|---------------|----------|----------|----------|----------|
| San Bernardino County Area Median Income: \$77,500 | Extremely Low | 16,600 | 19,000 | 21,960 | 26,500 | 31,040 | 35,580 | 40,120 | 44,660 |
| | Very Low Income | 27,650 | 31,600 | 35,550 | 39,500 | 42,700 | 45,850 | 49,000 | 52,150 |
| | Low Income | 44,250 | 50,600 | 56,900 | 63,200 | 68,300 | 73,350 | 78,400 | 83,450 |
| | Median Income | 54,250 | 62,000 | 69,750 | 77,500 | 83,700 | 89,900 | 96,100 | 102,300 |
| | Moderate Income | 65,100 | 74,400 | 83,700 | 93,000 | 100,450 | 107,900 | 115,300 | 122,750 |

Source: California Department of Housing and Community Development, Income Limits 2021.

2.4.2.1 Ability to Pay for Housing

In general, housing expenses (rent or mortgage payments, plus utilities) should not exceed 30 percent of a household's income in order to be considered affordable by the federal government. Households that pay over 30 percent of their income on housing are considered "overpaying" and may experience difficulty in paying for other basic necessities. For example, a household making the City of Redlands' estimated 2019 median income of \$74,839 that spent more than \$1,837 a month on housing (30% of income, divided by 12 months) may be paying more for housing than it can afford.

To truly evaluate housing affordability, individual circumstances and factors must be taken into account. These include long-term debt, mortgage interest rates, the number of children in a household, and other large, ongoing expenses (such as medical bills). Also, some households choose to pay over 30 percent of their income for various reasons, such as location, aesthetics, or other features. However, it is assumed that households will aim to minimize their housing costs whenever they can. Since it is impossible to take each household's individual circumstances into account, the 30 percent rule-of-thumb provides a general measure of housing affordability for the average household.

TABLE 2-142-14: COST BURDEN BY INCOME

| Income Group | Households by Share of Income Spent on Housing Cost: | | | | | | |
|----------------------------|--|----------------------------------|---------|------------------------------|---------|--------------------------------|---------|
| | Total | Households who Pay Less than 30% | | Households who Pay 30% - 50% | | Households who Overpay (50% +) | |
| | | Count | Percent | Count | Percent | Count | Percent |
| <30% Area Median Income | 2,100 | 355 | 17% | 225 | 11% | 1,520 | 72% |
| 30-50% Area Median Income | 2,139 | 414 | 19% | 570 | 27% | 1,155 | 54% |
| 50-80% Area Median Income | 2,980 | 1,170 | 39% | 1,315 | 44% | 495 | 17% |
| 80-100% Area Median Income | 2,135 | 1,205 | 56% | 790 | 37% | 140 | 7% |
| >100% Area Median Income | 14,205 | 12,245 | 86% | 1,690 | 12% | 270 | 2% |
| Total (computed) | 23,559 | 15,389 | | 4,590 | | 3,580 | |

Source: HUD CHAS, 2012-2016.

Table 2-14 shows the number of Redlands' households overpaying for housing as of 2016. In general, the higher a household's income, the smaller the percentage spent on housing. Also, extremely low- and very low-income households who own their home have lower rates of overpayment compared to renters, while moderate and above-moderate income households who own tend to have higher rates of overpayment for housing. Overall, about 8,170 households in Redlands, or 35 percent, are considered to be overpaying for housing.

2.4.3 Housing Costs

2.4.3.1 Ownership Housing

The value of housing in Redlands has gone up dramatically since 2000. Between 2000 and 2021, median home sales prices in Redlands increased 339 percent. However, the increases in the nearby cities ~~was~~were even greater during these periods. In 2021 the median home sales prices in Redlands were \$516,219. Overall, Redlands has the highest median home sales price compared to communities nearby.

TABLE 2-152-15: MEDIAN HOME SALE PRICES IN NEARBY COMMUNITIES

| City | 2000 | 2012 | 2021 | % Change 2000-2012 | % Change 2012-2021 | % Change 2000-2021 |
|----------------|-----------|-----------|-----------|-----------------------|-----------------------|-----------------------|
| San Bernardino | \$94,300 | \$119,536 | \$378,055 | 127% | 316% | 400% |
| Highland | \$122,200 | \$180,000 | \$427,014 | 147% | 237% | 349% |
| Redlands | \$152,200 | \$241,898 | \$516,219 | 158% | 213% | 339% |
| Yucaipa | \$116,400 | \$190,000 | \$457,829 | 163% | 240% | 393% |
| Loma Linda | \$151,300 | \$191,000 | \$499,765 | 126% | 262% | 330% |

Source: DQNews.com; 2013 CityData, Zillow 2021

To get a better sense of the dramatically fluctuating home sale prices over the last ten years, it is useful to break down housing sales by number of bedrooms. Table shows the median home sale prices in Redlands in 2003, 2007, 2012, and 2020.

TABLE 2-162-16: REDLANDS MEDIAN HOME SALES, 2003, 2007, 2012, 2020

| Number of Beds | Year | | | |
|----------------------------|-----------|-----------|-----------|-----------|
| | 2003 | 2007 | 2012 | 2020 |
| Condominiums | | | | |
| 1 | \$100,000 | \$160,000 | \$55,000 | \$139,000 |
| 2 | \$249,500 | \$255,500 | \$97,000 | \$195,000 |
| 3 | \$225,000 | \$290,000 | \$130,000 | \$305,000 |
| Single Family Homes | | | | |
| 1 | \$187,000 | \$382,500 | \$125,750 | - |
| 2 | \$153,000 | \$325,000 | \$165,250 | \$345,000 |
| 3 | \$220,000 | \$380,000 | \$200,000 | \$499,000 |
| 4 | \$207,000 | \$431,750 | \$280,000 | \$639,000 |
| 5 | \$610,000 | \$635,000 | \$401,000 | \$942,500 |

Sources: First American Real Estate Solutions (from County Assessor Data); HR&A, Inc; DQNews.com, 2013. Zillow 2020.

In general, the median sales price of both ~~single-family~~single-family homes and condominiums has increased since 2003, with a dip in sales prices during 2012 during the preparation of the 5th Cycle Housing Element. In 2020, the average price of a 3-bedroom home is approximately 2.25 times more expensive than in 2003. It appears that the 2012 median home sales values reflect the catastrophic impact of the Great Recession on San Bernardino. The rapid increases between 2003 and 2007 were more than lost and 2012 values sunk below 2003 in most house sizes. Median home sale prices for 1 and 2-bedroom condos have still not fully recovered. Single-family homes values also decreased dramatically, but have more than recovered in all categories, and generally show significant appreciation over the 2007 peak. Generally, the larger the home, the greater the recovery and cost.

2.4.3.2 Rental Housing

In 2019, the American Community Survey reported that the estimate median gross rent for housing in Redlands was \$1,473. In comparison, the 2011 American Community reported a median gross rent of \$1,078 signifying a general rent increase of 37% (in nominal dollars) between 2011 and 2019. This is a major increase in such a short time, although much less than the rate of increase in homeownership prices. Notably, this data is not differentiated by type of housing or number of bedrooms. Table , below, compares rents in Redlands to those in nearby cities.

TABLE 2-17: MEDIAN GROSS RENTS IN NEARBY CITIES

| City | 2007 ACS | 2011 ACS | 2019 ACS |
|----------------|----------|----------|----------|
| San Bernardino | \$850 | \$924 | \$1,103 |
| Highland | \$909 | \$963 | \$1,059 |
| Redlands | \$1,063 | \$1,078 | \$1,473 |
| Loma Linda | \$1,065 | \$1,117 | \$1,299 |
| Yucaipa | \$928 | \$987 | \$1,111 |
| Countywide | \$992 | \$1,092 | \$1,342 |

Sources: 2007, 2011, 2019 American Community Survey.

In 2019, the median gross rent in Redlands was about 14 to 39% higher than in neighboring jurisdictions. In 2007, the median gross rent in Redlands was between 7 to 25% higher, thus rents in Redlands have increased at a faster rate than those in nearby cities.

While rental statistics are not tracked in the same way as housing sales, it is possible to get a sense of current rents by looking through rental listings. Table shows rental prices as posted on Zillow in October 2020. These figures represent asking rents, not actual rents, and not all available rental units are listed on Zillow. Still, many residents do use Zillow to find housing.

TABLE 2-18: ZILLOW RENTAL SURVEY, OCTOBER 2020

| Number of Bedrooms | Rent Range | Median Rent |
|--------------------|---|-------------|
| Studio | \$1,500 - \$1,634 \$1,634 | \$1,567 |
| One | \$1,350 - \$1,825 \$1,825 | \$1,525 |
| Two | \$1,400 - \$2,065 \$2,065 | \$1,795 |
| Three | \$1,800 - \$2,695 \$2,695 | \$2,300 |

Source: Zillow, October 2020.

Table 2-19 shows rental prices as posted on Apartments.com in October 2020. Like the Zillow data, these figures are asking prices, not actual rents. Furthermore, there may be overlap between the apartments listed on Zillow and those listed on Apartments.com. Still, the median rents compare well between the two sources.

TABLE 2-192-19: APARTMENTS.COM RENTAL SURVEY, OCTOBER 2020

| Number of Bedrooms | Rent Range | | Median Rent |
|--------------------|------------|---------|-------------|
| Studio | \$950 | \$1,626 | \$1,375 |
| One | \$1,100 | \$1,690 | \$1,494 |
| Two | \$1,355 | \$2,039 | \$1,605 |
| Three | \$1,675 | \$2,560 | \$2,250 |

Source: apartments.com; search results from October 2020, all Redlands apartments.

2.4.4 Affordability of Housing

Four person households earning the 2021 median income for Redlands (\$77,500) could afford to spend up to \$1,938 per month on housing without being considered “overpaying.” For renters, this is a straightforward calculation, but home ownership costs are less transparent. A household can typically qualify to purchase a home that is 2.5 to 3.0 times the annual income of that household, depending on the down payment, the level of other long-term obligations (such as a car loan), and interest rates. In practice, the interaction of these factors allows some households to qualify for homes priced at more than three times their annual income, while other households may be limited to purchasing homes no more than two times their annual incomes. Table 2-20 below calculates the estimated maximum affordable purchase price by household income category.

TABLE 2-202-20: MAXIMUM FUNDS AVAILABLE FOR HOUSING, BY INCOME CATEGORY

| Household Income Category | Annual Income ¹ | Maximum Affordable Rent ² | Maximum Affordable Purchase Price ³ |
|------------------------------|----------------------------|--------------------------------------|--|
| 30 percent of county median | \$26,500 | \$663 | \$82,489 |
| 50 percent of county median | \$39,500 | \$988 | \$122,956 |
| 80 percent of county median | \$63,200 | \$1,580 | \$196,729 |
| 100 percent of county median | \$77,500 | \$1,938 | \$241,242 |
| 120 percent of county median | \$100,450 | \$2,511 | \$312,681 |

1. HCD's 2021 income limits. Assumes a four-person household.

2. Assumes 30 percent of income available for housing cost.

3. Assumes a down payment of 20%, and 30-year fixed rate mortgage at 6.0% annual interest rate.

Source: U.S. Department of Housing and Urban Development, 2020;

As noted earlier, the median purchase price of a home in Redlands in 2021 was \$516,219. This purchase price is too high for all but the highest of household income categories listed in Table to afford. Indeed, households must have an income much higher than 120 percent of the County median to afford a home.

2.4.4.1 Ownership Housing

The California Association of Realtors' (CAR) 2019 Q2 Housing Affordability index (HAI) reported that 50 percent of the households in San Bernardino County could afford a home selling for the region's median price. The indices for Los Angeles, Orange, and Riverside Counties, and with the state as a whole showed

affordability levels of 29, 24, 39 and 30 percent respectively, demonstrating that in 2013 housing in San Bernardino County was more affordable than in nearby regions and the state as a whole.

Home sales prices in Redlands, however, are still out of the affordable range for many families. In 2012, the median home sale price was \$165,250 for a two-bedroom home and \$200,000 for a three- bedroom home (Table 2.4-5), compared to \$345,000 and \$499,000 in 2019. According to Table 2.4-9, a family of four earning 100 percent of AMI would not be able to afford either a two-bedroom or three-bedroom home. Therefore, although Redlands is perhaps more affordable than some surrounding communities, those families earning less than 100 percent of AMI could find it quite difficult to afford a home in Redlands.

2.4.4.2 Rental Housing

For households that rent, the 2019 ACS estimated the proportion of household income spent on rent. In 2019, as shown in Table , over 50 percent of renters paid 30 percent or more of their income on rent. In comparison, the 2011 ACS reported that less than half of renters pay 30 percent or more. The increase in the number of renting households possibly overpaying for housing between 2011 and 2019 is likely strongly linked to the increase in rent over that same period.

In general, renters in Redlands experience higher levels of overpayment. According to HUD’s 2017 housing data, 48 percent of renters pay 30 percent or more on housing costs, with 24 percent paying 50 percent or more. This is contrasted with homeowners, 24 percent of which pay at 30 percent or more on housing costs, and 10 percent pay 50 percent or more.

TABLE 2-212-21: RENT AS A PERCENTAGE OF HOUSEHOLD INCOME, 2019

| | Number of Households | Percent of Population |
|------------------------|----------------------|-----------------------|
| Less than 10.0 percent | 237 | 2.5% |
| 10.0 to 14.9 percent | 816 | 8.6% |
| 15.0 to 19.9 percent | 1,112 | 11.7% |
| 20.0 to 24.9 percent | 920 | 9.7% |
| 25.0 to 29.9 percent | 1,096 | 11.5% |
| 30.0 to 34.9 percent | 846 | 8.9% |
| 35.0 to 39.9 percent | 518 | 5.4% |
| 40.0 to 49.9 percent | 1,053 | 11.1% |
| 50.0 percent or more | 2,506 | 26.3% |
| Not computed | 412 | 4.3% |
| Total | 9,516 | 100.0% |

Source: ~~2019 American~~2019 American Community Survey.

Assuming a four-person household would require at least a two or three bedroom apartment, the average of the Craigslist and Apartments.com median rents of \$1,700 for a two-bedroom unit and \$2,275 for a

three-bedroom unit would only be considered affordable to residents whose incomes were at least 100 percent of AMI. Though a family of four would be considered “overcrowded” in this apartment, an extremely low-income family would not even be able afford this rent. Moreover, there may be no market rate units that are available to many very low- and extremely low-income families.

2.5 HOUSING CHARACTERISTICS

Although the characteristics of individual residents and households are important to understanding the growth and evolution of a city, the more useful unit for analysis concerning housing needs is the housing units.

2.5.1 Housing Vacancies

In 2000, 4.9% of housing units in Redlands were vacant. By 2010, 7.7% of housing units were vacant.

By 2019, Redlands had a total of 26,369 housing units; 1,827 (7.4%) of which were vacant. The homeownership vacancy rate was 2.0% and the rental vacancy rate was 3.9%. The balance consisted of units that were rented or sold but not occupied (305), for seasonal recreational, or occasional use (222), or vacant for migrant workers (86).

In terms of vacant units by type, Redlands similar vacancy rates to the SCAG region with the exception of seasonal housing where the SCAG region takes into consideration mountain, desert, and coastal communities that have larger proportions of seasonal housing.

TABLE 2-22: VACANT UNITS BY TYPE

| Housing Type | Redlands 2000 | Redlands 2011 | Redlands 2018 | SCAG Region |
|--------------|---------------|---------------|---------------|-------------|
| For Rent | 46.5% | 45.2% | 19.3% | 20.7% |
| Rented | | | 8.5% | 5.4% |
| For Sale | 26.7% | 19.9% | 24.9% | 7.9% |
| Sold | | | 13.2% | 4.5% |
| Seasonal | 7.2% | 8.0% | 6.7% | 33.5% |
| Migrant | 0.0% | 0.0% | 0.0% | 0.3% |
| Other | 11.7% | 16.7% | 27.4% | 27.7% |

Source: SCAG Pre-certified Local Housing Data.

2.5.2 Substandard Housing

Table 2-23 provides a breakdown of housing units that are substandard by either not having telephone service, lacking plumbing, or lacking complete kitchen facilities. Redlands leads the SCAG region with housing units having no telephone service available; however, the percentage of households with no telephone service is under three percent, and the absence of telephone service does not appear to

correlate with housing quality across the City. Redlands has fewer substandard housing units than the SCAG regional in terms of plumbing and kitchen facilities.

TABLE 2-23-23: SUBSTANDARD HOUSING

| Substandard Housing Criteria | Redlands | SCAG Region |
|-------------------------------------|----------|-------------|
| No telephone service | 2.57% | 1.95% |
| Lacking Plumbing Facilities | 0.26% | 0.39% |
| Lacking Complete Kitchen Facilities | 0.92% | 1.29% |

Source: American Community Survey 2014-2019 5-year estimates.

[Data provided by code enforcement documents that over the last 4 years there have been 5 recorded cases of substandard housing. This leads to an estimate of fewer than 10 units of substandard housing in the City.](#)

2.5.3 Housing Type

Table 2-24 shows Redlands has a greater percentage of single-family detached housing and mobile homes than the SCAG region, but trails the SCAG region in single-family attached and multi-family units.

TABLE 2-24-24: HOUSING TYPE

| Housing Type | Redlands | SCAG Region |
|-------------------------|----------|-------------|
| Single-Family Detached | 64.0% | 54.4% |
| Single Family Attached | 4.4% | 7.2% |
| Multi-family, 2-4 Units | 11.6% | 7.5% |
| Multi-family, 5+ Units | 16.0% | 27.3 |
| Mobile Homes | 4.0% | 3.5% |

Source: SCAG Pre-certified Local Housing Data.

As shown in Table 2-25, two- and three-bedroom units represented the majority of housing types in the City, though four-bedroom units are also prevalent. Units with five bedrooms or more are very uncommon, comprising just 5.9% of the housing stock.

TABLE 2-25: HOUSING UNITS BY NUMBER OF BEDROOMS

| Number of Bedrooms | Number of Units | Percent of Total Housing Units |
|-----------------------|-----------------|--------------------------------|
| Studio | 580 | 2.2% |
| One bedroom | 2,705 | 10.3% |
| Two bedrooms | 7,635 | 29.0% |
| Three bedrooms | 8,088 | 30.7% |
| Four bedrooms | 6,056 | 23.0% |
| Five or more bedrooms | 1,305 | 4.9% |
| Total | 24,280 | 100.0% |

Source: American Community Survey 2014-2019 5-year estimates.

2.5.4 Tenure

Table 2-26 describes the tenure and the type of housing according to the American Community Survey 2019 5-year estimates. In 2011, there were 17,068 detached and attached single-family units. Duplexes and three to four unit buildings comprised 9.5% of the total units, and buildings of five or more units 16.7% of the total.

In 2019, there were 18,466 detached and attached single-family units. Duplexes and three to four unit buildings comprised 9.1% of the total units, and buildings of five or more units made up 17.6% of the total.

The overall tenure pattern in the City of occupied households was 61% owner-occupied, and 39% renter-occupied. Redlands's housing stock consists of 24,280 total units, 14,313 of which are owner-occupied and 9,967 of which are renter-occupied.

SCAG considers 2.3% to be the minimum ideal vacancy rate for ownership housing and 5 percent to be the minimum ideal vacancy rate for rental housing. These rates are ideal because they allow for a healthy amount of market turnover and availability. According to the 2019 ACS estimates, the 2019 vacancy rate in Redlands was 3.4% for ownership housing, which is above the 2.3% vacancy rate considered by SCAG to be the minimum needed for a healthy market. The rental vacancy rate was 3.8%.

TABLE 2-26: CHARACTERISTICS OF REDLANDS TENURE

| Type and Tenure | Number of Units, 2011 | Percent of Total Units, 2011 | Number of Units, 2019 | Percent of Units, 2019 |
|------------------------|--------------------------|---------------------------------|--------------------------|---------------------------|
| Single-Family Detached | 16,863 | 64.2% | 17,145 | 65.0% |
| Single-Family Attached | 1,148 | 4.4% | 1,321 | 5.0% |
| Duplex | 520 | 2.0% | 391 | 1.5% |
| 3 to 4 Units | 2,247 | 8.5% | 2,010 | 7.6% |
| 5+ Units | 4,385 | 16.7% | 4,565 | 17.6% |
| Mobile Homes | 1,096 | 4.2% | 806 | 3.1% |
| Other | 26 | 0.1% | 40 | 0.2% |
| Total Units | 26,285 | 100% | 24,280 | 100.0% |
| Owner-Occupied | 14,875 | 56.6% | 15,026 | 61.2% |
| Renter-Occupied | 9,382 | 35.7% | 9,516 | 38.8% |

Source: American Community Survey 2007 – 2011, 2014-2019 5-year estimates.

An analysis of the 2010 U.S. Census data shows that the majority of both owner- and renter- occupied units (81 and 67 percent respectively) were occupied by Whites (Table 2-27). Blacks rented 867 units but owned only 394. Native Americans rented more units than they owned, with 119 rented and 92 owned units. Asian/Pacific Islanders owned more units than they rented, but only accounted for 7% of all owners and 7% of all renters. Those who identified as “Some other race,” were more likely to rent (1,219 rented versus 970 owned units), and those of “Two or more races” were about as likely to own or to rent (344 versus 383 units).

Similarly, in the County, a higher percentage of Whites, Native Americans, and those of “Some other race,” and those of “Two or more races” owned than rented units, while a higher percentage of Blacks rented than owned. There were about 800 more Native American owner-occupied units than renter-occupied units. Asian/Pacific Islanders and Whites were both more than twice as likely to own versus rent.

TABLE 2-272-27: TENURE BY RACE IN 2010

| Race | City | Percent | County | Percent |
|------------------------------|---------------|--------------|----------------|--------------|
| Owner-Occupied Units | 15,061 | 60.8% | 383,573 | 62.7% |
| White | 12,189 | 80.9% | 261,151 | 68.1% |
| Black | 394 | 2.6% | 25,036 | 6.5% |
| Native American | 92 | 0.6% | 3,785 | 1.0% |
| Asian/Pacific Islander | 1,044 | 6.9% | 27,119 | 7.1% |
| Some other race | 28 | 0.2% | 735 | 0.2% |
| Two or more races | 970 | 6.4% | 54,065 | 14.1% |
| Renter-Occupied Units | 9,703 | 39.2% | 228,045 | 37.3% |
| White | 6,460 | 66.6% | 121,986 | 53.5% |
| Black | 867 | 8.9% | 33,488 | 14.7% |
| Native American | 119 | 1.2% | 2,975 | 1.3% |
| Asian/Pacific Islander | 610 | 6.3% | 11,166 | 4.9% |
| Some other race | 45 | 0.5% | 919 | 0.4% |
| Two or more races | 1,219 | 12.6% | 47,685 | 20.9% |

Source: 2010 U.S. Census

In many places, housing tenure varies substantially based on the age of the householder. In Redlands, the age group where renters outnumber owners the most is 15-24 (by 92.8%). The age group where owners outnumber renters the most is 65-74 (by 56.5%) Table 2-28 compares the number of owner-occupied and renter-occupied units in the City of Redlands and San Bernardino County. There were similar ownership and renter trends in the City and County, although a higher percentage of elderly people rent in Redlands (16%) than in the County (9%). Therefore, the demand for senior rental units in Redlands is likely to be higher than the County as a whole.

TABLE 2-28: TENURE BY AGE OF HOUSEHOLDER, 2011 AND 2019

TABLE 1. LOS ANGELES BY AGE OF HOUSEHOLDER, 2011 AND 2019

| Age | 2011 City | Percent | 2019 City | Percent | County | Percent |
|-----------------------|-----------|---------|-----------|---------|--------|---------|
| Owner-Occupied Units | | | | | | |
| 15 to 24 | 53 | 0.4% | 21 | 0.1% | 2,705 | 0.7% |
| 25 to 34 | 1,246 | 8.4% | 974 | 6.8% | 34,919 | 9.0% |
| 35 to 44 | 2,403 | 16.2% | 2,190 | 15.3% | 68,329 | 17.6% |
| 45 to 54 | 3,876 | 26.1% | 2,835 | 19.8% | 80,178 | 20.7% |
| 55 to 59 | 1,772 | 11.9% | 1,472 | 10.3% | 49,124 | 12.7% |
| 60 to 64 | 1,711 | 11.5% | 1,960 | 13.7% | 45,778 | 11.8% |
| 65 to 74 | 2,072 | 13.9% | 2,768 | 19.3% | 65,542 | 16.9% |
| 75 to 84 | 1,742 | 11.7% | 1,456 | 10.2% | 31,909 | 8.2% |
| 85+ | | | 637 | 4.5% | 9,595 | 2.5% |
| Renter-Occupied Units | | | | | | |
| 15 to 24 | 753 | 8.0% | 562 | 5.6% | 13,715 | 5.3% |
| 25 to 34 | 2,896 | 30.9% | 2,901 | 29.1% | 70,035 | 27.3% |
| 35 to 44 | 1,642 | 17.5% | 2,203 | 22.1% | 56,721 | 22.1% |
| 45 to 54 | 1,585 | 16.9% | 1,396 | 14.0% | 46,379 | 18.1% |
| 55 to 59 | 640 | 6.8% | 609 | 6.1% | 19,255 | 7.5% |
| 60 to 64 | 395 | 4.2% | 612 | 6.1% | 16,144 | 6.3% |
| 65 to 74 | 727 | 7.7% | 772 | 7.7% | 22,640 | 8.8% |
| 75 to 84 | 744 | 7.9% | 550 | 5.5% | 8,410 | 3.3% |
| 85+ | | | 364 | 3.7% | 3,380 | 1.3% |

Source: 2014-2019 American Community Survey 5-year estimates.

2.5.5 Vacant Units

In 2000, Redlands had a total of 24,878 housing units; 1,209 (4.9%) of which were vacant. About half (562) of these were for rent, while less than a third (324) were for sale. The balance consisted of units that were rented or sold but not occupied (94), for seasonal recreational, or occasional use (88), or vacant for some other reason (141). The Census reported that Redlands had no vacant units available specifically for migrant workers.

TABLE 2-29: VACANCY STATUS, 2011 AND 2019

| Vacant Units | 2011 | 2019 |
|---|------|------|
| For rent | 916 | 399 |
| For sale only | 403 | 249 |
| Rented or sold, not occupied | 208 | 305 |
| For seasonal, recreational, or occasional use | 163 | 222 |
| For migrant workers | 0 | 86 |
| Other vacant | 338 | 0 |

Source: 2007-2011 and 2014-2019 American Community Survey 5 year estimates.

In 2011, Redlands had a total of 26,285 housing units; 2,028 (7.7%) of which were vacant. The homeownership vacancy rate was 2.6 percent and the rental vacancy rate was 8.8 percent. About half (916) of these were for rent, while about one-fifth (403) were for sale. The balance consisted of units that were rented or sold but not occupied (208), for seasonal recreational, or occasional use (163), or vacant for some other reason (338).

By 2019, Redlands had a total of 26,369 housing units; 1,827 (7.4%) of which were vacant. The homeownership vacancy rate was 2.0 percent and the rental vacancy rate was 3.9 percent. The balance consisted of units that were rented or sold but not occupied (305), for seasonal recreational, or occasional use (222), or vacant for migrant workers (86).

2.5.6 Age of Housing Stock

According to the 2019 ACS, approximately 42% of the housing stock in Redlands was built before 1970, and 34 percent was built before 1980. The ACS estimates that 3,678 homes in Redlands were built before 1950 (14% of the total).

TABLE 2-30: AGE OF HOUSING UNITS

| Year Unit Built | Number of Units | Percent of Total Units |
|---------------------|-----------------|------------------------|
| Built 2014 or later | 222 | 0.8% |
| Built 2010 to 2013 | 206 | 0.8% |
| Built 2000 to 2009 | 1,773 | 6.7% |
| Built 1990 to 1999 | 1,506 | 5.7% |
| Built 1980 to 1989 | 5,306 | 20.1% |
| Built 1970 to 1979 | 6,218 | 23.6% |
| Built 1960 to 1969 | 3,510 | 13.3% |
| Built 1950 to 1959 | 3,950 | 15.0% |
| Built 1940 to 1949 | 1,155 | 4.4% |
| Built before 1939 | 2,523 | 9.6% |
| Total | 26,369 | 100.0% |

Source: 2014 – 2019 American Community Survey.

2.5.7 Condition of Housing

An overwhelming majority of homes in Redlands are fairly new and do not lack critical features such as plumbing. However, basic maintenance, such as roof repair, new paint, and cleanliness will need to be continuously encouraged, particularly as a substantial portion of housing units are older than 30 years. Deferred maintenance such as old paint, roof sheathing that has outlasted its useful life, localized wood rot, and similar concerns do not typically result in units being boarded up, although such conditions do contribute to neighborhood deterioration.

2.5.7.1 Features

Adequate utilities within a housing unit are another measure of a housing unit's ability to provide people with decent housing. According to the 2019 ACS estimates, of the 24, 542 occupied housing units in the City of Redlands, 45 units lacked complete plumbing facilities. The Census Bureau defines complete plumbing facilities as including (1) hot and cold piped water, (2) a flush toilet, and (3) a bathtub or shower. Furthermore, all three facilities must be located inside the dwelling unit. Heating fuel for occupied housing units ranged from gas and electricity to wood and solar energy. Of the occupied housing units in the City, 18,500 had utility gas, 363 had tank gas, 5,018 had electricity, 40 used fuel oil or kerosene, 65 were fueled by wood, 70 used solar energy, and 424 units had no heating fuel.

As of 2019, almost all housing units in Redlands had complete kitchen and plumbing facilities, although at least 221 units lacked an adequate kitchen and 105 units had incomplete plumbing facilities. Because the overwhelming majority of housing units has complete plumbing and kitchen facilities, and are served by utilities, it is unlikely that housing conditions represent a problem that requires government action.

2.5.7.2 Rehabilitation Need

The percentage of units built before 1960 can be used to estimate the City's maximum rehabilitation need. According to the 2019 ACS about 29% of housing units were built before 1960.

However, according to the City's Building and Safety Division, many of the older homes in Redlands are in better condition than would be predicted based on age alone, partly because of interest by owners in fixing up historic homes and the City's robust Historic Preservation policies. Many of the City's historic homes in the south area are protected to some extent by local historic districts which require staff and/or Historic and Scenic Preservation Commission approval for modifications to the exterior. The majority of repair work is needed in the north area, with a number of units in need of either light repair—such as painting, reroofing, and landscaping—or significant reconstruction. There are no historic preservation districts in North Redlands despite having a large number of homes greater than 50 years of age.

During the 4th Cycle, the City used Redevelopment funds to address blight in North Redlands. Since the dissolution of Redevelopment, the City has not been able to provide direct rehabilitation assistance during the 5th Cycle Housing Element planning period. It is documented in the City's permit record that 11 units required substantial rehabilitation and 5 units were unsafe for habitation. All of the 11 units were single-family dwellings.

2.6 ASSISTED HOUSING

Assisted housing projects in the City can alleviate the financial hardships low-income households may face. Assisted housing projects are those that offer financial aid or provide extra services for people in need of financial or basic living assistance. There are a variety of programs, each focusing on a specific need or with a specific goal to eliminate unmet housing needs in the community.

2.6.1 Public Housing

The Housing Authority of the County of San Bernardino (HACSB) operates 120 units of conventional public housing in Redlands. All conventional units are rented to households with an income of 80 percent or less than the median income for the Riverside-San Bernardino Standard Metropolitan Statistical Area.

2.6.2 Housing Choice Voucher Program

In addition to operating public housing, the Housing Authority administers the HUD Housing Choice Voucher Program. In addition to operating public housing, HACSB administers the HUD Housing Choice Voucher program. Formerly, the County operated both a voucher and certificate programs. Formerly, the County operated both voucher and certificate programs. However, as of 1999, the certificate program ended. Under the Housing Choice Voucher Program, the Housing Authority makes subsidy payments to property owners on behalf of the family. The program uses a Payment Standard to determine the maximum amount of assistance that will be paid on behalf of the family. The family's portion will be a minimum of 30 percent of their adjusted gross monthly income up to a maximum of 40 percent if they choose. HACSB administers the Housing Services programs that include the Housing Choice Voucher and Five-Year Lease Assistance programs. Participants on these programs may choose the city/community in

which they wish to reside within San Bernardino County. As of 2019, there were 561 units of housing as part of the voucher program within the City of Redlands.

As mentioned above, the Housing Choice Voucher Program pays the difference in rent between 30 (or 40) percent of a household's income and fair-market rent for the unit. Payment Standards effective October 1, 2020, for the voucher program are as follows:

- Studio: \$840
- One bedroom: \$930
- Two bedroom: \$1,070
- Three bedroom: \$1,475
- Four bedroom: \$1,850
- Five bedroom: \$2,130
- Six bedroom: \$2,405

The above rents assume the owner pays utilities. If not, the rent ceiling could be reduced by \$110 to over \$200, depending on the size of the unit.

2.6.3 Other Programs

The City of Redlands has previously pursued several programs for constructing housing units affordable to low- and very low-income households. These include the granting of density bonuses and the issuing of Mortgage Revenue Bonds. Since 1981, 164 density bonus units have been built, with 86 affordable to very low-income households and the rest to low- and moderate-income households. Since the last Housing Element planning period, the City has approved 80 low-income housing units using a density bonus.

With the dissolution of California's Redevelopment Agency in 2012, the ability of the City to offer financial assistance has been curtailed.

2.7 AT-RISK HOUSING

Housing Element law requires that a jurisdiction provide an analysis of existing publicly assisted housing developments that are eligible to convert from low-income use to market-rate housing during the next ten years (October 15, 2021, through October 15, 2031) due to termination of subsidy contracts, mortgage prepayment, or expiration of deed restrictions. This analysis is required only for multi-family rental housing for lower-income households.

2.7.1 Conversion Risk

Assisted housing units are those that offer financial aid or provide extra services for people in need of financial or basic living assistance. Subsequent amendments have clarified the scope of the analysis to

also include units developed pursuant to inclusionary housing and density bonus programs. In the preservation analysis, localities are required to provide an inventory of assisted, affordable units that are eligible to convert to market rate within 10 years. As part of the analysis, an estimation of the cost of preserving versus replacing the units is to be included, as well as a discussion of programs designed to preserve affordable units.

The California Housing Partnership Corporation (CHPC) assists nonprofit and government housing agencies to create, acquire, and preserve housing affordable to lower income households. As shown in Table , CHPC lists 60 assisted units in Redlands at risk of conversion within the next 5 years, and another 219 units in more than 10 years. The 60 units at risk for conversion are the Citrus Arms Apartments [at 151 Judson St.](#) The current contract is set to expire on April 30, 2024. Program 1.4-11.4-1 (Preservation/At Risk Housing) commits the City to tracking and monitoring at risk housing, notifying the property owner of requirements, and engaging the property owner in a renewal contract.

TABLE 2-312-31: HOUSING DEVELOPMENTS AT-RISK OF CONVERSION

| Risk Level | Definition: | Low-income units in jurisdiction | Percent of county's low income units |
|---------------|---|----------------------------------|--------------------------------------|
| Very High | At-risk of converting to market rate within the next year | 0 | 0% |
| High | At-risk of converting to market rate in the next 1-5 years | 60 | 22% |
| Moderate | At-risk of converting to market rate in the next 5-10 years | 0 | 0% |
| Low | At-risk of converting to market rate in the next 10 or more years and/or are owned by a large/stable nonprofit, mission-driven developer. | 219 | 78% |
| Total: | | 279 | 100% |

Source: California Housing Partnership, July 2020. Includes HUD, Low-Income Housing Tax Credit (LIHTC), USDA, and CalHFA projects, SCAG Pre-Certified Data.

In order for the property owner to successfully opt-out of the Housing Choice Voucher contract, the owner must satisfy certain procedural requirements. The owner must provide notice of expiring rental restrictions to affected public entities and tenants three years prior to the scheduled expiration date. A Notice of Intent (NOI) must be filed with HUD one year before the termination date that indicates the owner's intent to convert the units to market rate. Failure to file an NOI within the specified timeframe, or follow the other procedures to opt-out of the Housing Choice Voucher contract, results in an automatic contract rollover for five years.

Upon filing of an NOI, HUD may offer several incentives to property owners to remain in their contracts, including re-financing the property mortgage and establishing higher rents charged for the projects.

Pursuant to Section 65863.10 of the Government Code, the property owner of a Housing Choice Voucher contract must also provide six months advanced notification to each tenant household if the property owner intends to terminate the Housing Choice Voucher contract. The notice must indicate the anticipated date of conversion and the anticipated rent increase. The property owner is also required to serve notice to the City.

Fair market rents for the San Bernardino County area in fiscal year 2020 are provided in Table below.

TABLE 2-322-32: FAIR MARKET RENTS FOR EXISTING HOUSING IN SAN BERNARDINO COUNTY

| Studio | One Bedroom | Two Bedroom | Three Bedroom | Four Bedroom |
|--------|-------------|-------------|---------------|--------------|
| \$875 | \$1,030 | \$1,289 | \$1,789 | \$2,216 |

Source: Federal Register, HUD, FY 2020.

The rental market is seeing high prices which may threaten to induce owners of affordable units to convert those units to market rate.

2.7.2 Preservation and Replacement Options

In Redlands, the cost of conserving assisted units is estimated to be significantly less than that required to replace the units through new construction. The difference between extremely/very low-income and market-rate rents requires the most subsidy; preserving low- and moderate-income units does not require as much subsidy. Since land prices and land availability are generally the limiting factors to development of low-income housing, it is estimated that subsidizing rents to preserve assisted housing is more feasible and economical than new construction. HACSB performs this work for jurisdictions throughout San Bernardino County, including Redlands. Both HACSB and the City are responsible for the preservation and replacement of assisted housing units.

To maintain the existing affordable housing stock, HACSB works to preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of units to non-profit ownership; 2) provision of rental assistance to tenants using other funding sources; and 3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units.

2.7.2.1 Transfer of Ownership

Transferring ownership of an at-risk project to a non-profit housing provider is generally one of the least costly ways to ensure that the at-risk units remain affordable for the long term. By transferring property ownership to a non-profit organization, low-income restrictions can be secured, and the project would become potentially eligible for a greater range of governmental assistance.

2.7.2.2 Construction of Replacement Units

Currently, programs that fill this role are managed by the County Housing Authority. The construction of new low-income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e., square footage and number of bedrooms), location, land costs, and type of construction. Presently, the cost to develop new housing in western San Bernardino County ranges from \$118-\$176¹ per square foot depending on the type and quality of finishes. Permit costs in the City are

¹ <https://home-builders.promatcher.com/cost/san-bernardino-ca-home-builders-costs-prices.aspx>. Accessed 8/30/2021.

There are three methods of assisting low-income tenants living in at-risk units: 1) providing monthly rental subsidies in the private market, 2) acquiring and preserving the presently subsidized units, and 3) constructing comparable replacement units.

In addition to the federally financed assisted developments listed in Table 2.8-1, projects funded by the former Redlands Redevelopment Agency (RDA) using the 20 percent housing set-aside are potentially “at-risk” of conversion as well. In exchange for financial assistance, the former RDA entered into regulatory agreements with property owners to keep units affordable at specified levels until the agreements expired. Under the Redevelopment Dissolution Act, the former RDA’s housing functions and most of its housing assets were transferred to a “successor housing agency,” separate from the Redlands Successor Agency, including the transfer of all housing covenants. The housing successor for the City of Redlands is the Housing Authority of the County of San Bernardino (HACSB). [Assets of the HACSB are not considered to be at risk units. There are no additional projects funded by the Redlands Redevelopment Agency that are at risk of conversion to market rate uses.](#)

2.7.2.3 Qualified Entities

The California Department of Housing and Community Development (HCD) keeps a current list of all of the qualified entities across the state. A “qualified entity” is a nonprofit or for-profit organization or individual that agrees to maintain the long-term affordability of housing projects. The qualified entities that HCD lists for San Bernardino County are in Table .

TABLE 2-332-33: QUALIFIED ENTITIES, SAN BERNARDINO COUNTY (2020)

| Organization | City | Phone Number |
|--|----------------|--------------------|
| Innovative Housing Opportunities, Inc. | Irvine | (949) 863-9740 |
| Abbey Road Inc. | North Hills | (818) 332-8008 |
| ROEM Development Corporation | Santa Clara | (408) 984-5600 x17 |
| CSI Support & Development Services | Monrovia | (626) 599-8464 |
| Coalition for Economic Survival | Los Angeles | (213) 252-4411 |
| Keller & Company | San Diego | |
| Poker Flats LLC | Los Angeles | |
| Orange Housing Development Corporation | Orange | (714) 288-7600 |
| Nexus for Affordable Housing | Orange | (714) 282-2520 |
| The East Los Angeles Community Union (TELACU) | Los Angeles | (323) 838-8556 |
| Southern California Presbyterian Homes | Glendale | (818) 247-0420 |
| Housing Corporation of America | Laguna Beach | (323) 726-9672 |
| Coachella Valley Housing Coalition | Indio | (760) 347-3157 |
| BUILD Leadership Development Inc. | Newport Beach | (949) 720-7044 |
| Century Housing Corporation | Culver City | (310) 642-2007 |
| Neighborhood Housing Services of the Inland Empire, Inc. | San Bernardino | (909) 884-6891 |

Source: California Department of Housing and Community Development, 2020.

However, given the fact that the owners of all of the housing units listed in Table 2.8-4 intend to continue to renew their financing programs with HUD, there is no need for qualified entities to acquire these properties.

2.7.3 Financing and Subsidy Resources

The housing element must identify all federal, state, and local financing and subsidy programs that are available as preservation resources. These resources are:

- Low Income Housing Tax Credits (“LIHTC”)
- CalCHA bonds
- California Housing Finance Agency
- CalHome
- SB2 Permanent Local Housing Allocation
- HOME Investment Partnership Program
- Recycled RDA Funds

2.8 OPPORTUNITIES FOR ENERGY CONSERVATION

There are many opportunities for conserving energy in new and existing homes. Construction of energy efficient buildings does not lower the purchase price of housing. However, housing with energy conservation features should result in reduced monthly occupancy costs as consumption of water and energy is decreased. Similarly, retrofitting existing structures with energy-conserving features can result in a reduction in utility costs. Examples of energy conservation opportunities include weatherization programs and home energy audits; installation of insulation; installation or retrofitting of more efficient appliances, and mechanical or solar energy systems; and building design and orientation that incorporates energy conservation considerations.

2.8.1 Building Design and Construction

Many modern design methods used to reduce residential energy consumption are based on proven techniques that have been known to humans since the earliest of days of collective settlement. These methods can be categorized in three ways:

1. Building design that keeps natural heat in during the winter and keeps natural heat out during the summer. Such design reduces air conditioning and heating demands. Proven building techniques in this category include:
 - Locating windows and openings in relation to the path of the sun to minimize solar gain in the summer and maximize solar gain in the winter;
 - Use of “thermal mass,” earthen materials such as stone, brick, concrete, and tiles that absorb heat during the day and release heat at night;
 - “Burying” part of the home in a hillside or berm to reduce solar exposure or to insulate the home against extremes of temperature;
 - Use of window coverings, insulation, and other materials to reduce heat exchange between the interior of a home and the exterior;
 - Locating openings and using ventilating devices to take advantage of natural air flow; and
 - Use of eaves and overhangs that block direct solar gain through window openings during the summer but allow solar gain during the winter.
2. Building orientation that uses natural forces to maintain a comfortable interior temperature. Examples include:
 - North-south orientation of the long axis of a dwelling;
 - Minimizing the southern and western exposure of exterior surfaces; and
 - Location of dwellings to take advantage of natural air circulation and evening breezes.
 - Use of landscaping features to moderate interior temperatures. Such techniques include:

- Use of deciduous shade trees and other plants to protect the home;
- Use of natural or artificial flowing water; and
- Use of trees and hedges as windbreaks.

In addition to natural techniques that have been used for millennia, a number of modern methods of energy conservation have been developed or advanced during the present century. These include:

- Use of solar energy to heat water;
- Use of solar panels, photovoltaic technology, and other devices to generate electricity;
- Window glazing to repel summer heat and trap winter warmth;
- Weather-stripping and other insulation to reduce heat gain and loss; and
- Use of energy efficient home appliances.

2.8.2 State Building Code Standards

The California Energy Commission was created in 1974 by the Warren-Alquist State Energy Resources Conservation and Development Act (Public Resources Code 25000 et seq.). Among the requirements of the new law was a directive for the Commission to adopt energy conservation standards for new construction. The first residential energy conservation standards were developed in the late 1970s (Title 24, Part 6 of the California Code of Regulations) and have been periodically revised and refined since that time.

Residential site design and construction techniques that can reduce the amount of energy used for space cooling would significantly reduce overall energy demand. As discussed above, a number of traditional and modern techniques can decrease energy used for space cooling, including:

- The orientation of buildings and windows with respect to the path of the sun;
- Landscaping to shade and insulate buildings;
- Insulation in walls and ceilings;
- Thermal mass to absorb solar energy during the day and release it at night; and
- Window treatments to reduce solar gain during the day;
- Installation of radiant heat barriers under roofing materials and the selection of “cool roof” shingles;
- Use of low heat gain pavers/hardscape to reduce the heat island effect.

The City’s abundant sunshine provides an opportunity to use solar energy techniques to generate electricity, heat water, and provide space heating during colder months, as well. Natural space heating can be substantially increased through the proper location of windows and thermal mass.

2.8.3 Public Utility Programs

2.8.3.1 Electricity

Southern California Edison (SCE) is the electricity provider for much of Southern California, including Redlands. SCE offers a range of programs designed to assist residential consumers with energy conservation:

- The Home Energy Efficiency Rebates (HEER) Program offers rebates on a first-come first-serve basis to residential customers for energy efficient cooling systems, water heaters and pumps, as well as appliances
- Residential Energy Efficiency Loan Program (REEL) for renters or homeowners to obtain attractive financing terms for energy efficient updates.
- Residential Solar Programs for single-family homes (DAC-SASH), Solar on Multifamily Affordable Housing and Multifamily Solar Housing (SOMAH & MASH).
- Edison SmartConnect is a smart metering system that facilitates energy efficiency by communicating directly with appliances and reducing the burden on the electric system as a whole during peak electricity usage.
- The Low Income Home Energy Assistance Program (LIHEAP) is a federally funded program aimed to assist low-income households that pay a high portion of their income to meet their energy needs. LIHEAP is funded by the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services.
- COVID-19 Rent Relief helps income eligible households pay rent and utilities.

Southern California Edison also offers several programs with the potential to assist low-income residents with their electricity costs, including those that do so through energy conservation.

The Energy Management Assistance (EMA) Program helps income-qualified households conserve energy by covering the purchase and installation costs of energy-efficient appliances and equipment. To qualify, SCE customers must receive service through a residential electric meter and have an SCE service account, as well as meet income qualifications (Table 2-34).

TABLE 2-342-34: EMA INCOME QUALIFICATIONS

| Maximum Household Income (Effective from June 1, 2021, to May 31, 2022) | |
|---|------------------------------|
| Number of Persons in Household | Total Combined Annual Income |
| 1 - 2 | Up to \$34,840 |
| 3 | Up to \$43,920 |
| 4 | Up to \$53,000 |
| 5 | Up to \$62,080 |
| 6 | Up to \$71,160 |
| 7 | Up to \$80,240 |
| 8 | Up to \$89,320 |
| Each additional person | \$9,080 |

Upper Limit Calculation = 250% of Federal Poverty Guidelines

Source: Southern California Edison, Energy Saving Program, 2021, <https://www.sce.com/residential/assistance/energy-saving-program>

Assistance is available to both owners and renters, though renters must obtain their landlord's permission. Customers may only receive EMA services once every ten years.

The Multifamily Energy Efficiency Rebate (MEER) Program offers property owners and managers of existing multifamily properties incentives on a broad spectrum of energy efficiency improvements in lighting, HVAC, ~~insulation~~insulation, and window categories. While MEER is available to all multifamily developments—even those without especially high proportions of affordable housing—it would be particularly helpful to low-income people, who are more likely to live in multifamily rental housing.

2.8.3.2 Gas

The Southern California Gas Company (SCGC) provides gas for heating and cooking purposes to Redlands, and many other communities in the southern part of the state. The following are a list of energy efficiency programs offered by the utility:

- Home Energy Efficiency Rebate (HEER) Program offers cash rebates on qualifying energy efficiency upgrades and improvements made on single family homes, condominiums, or attached residential units (maximum of four);
- Multifamily Energy Efficiency Rebate (MEER) Program offers cash rebates for the installation of qualified energy-efficient products in apartment dwelling units and in the common areas of apartment and condominium complexes, and common areas of mobile home parks.

The Southern California Gas Company also offers the Direct Assistance Program (DAP) which provides no-cost weatherization services such as ceiling and pipe insulation and water heater blankets as well as furnace repair and replacement to qualified low-income customers. The income qualifications are the same as those listed previously to qualify for Southern California Edison's EMA Program.

2.8.3.3 Water

The City of Redlands Municipal Utilities & Engineering Department provides residents with water audits upon request to help assist in water conservation. At present, irrigation is allowed only on assigned irrigation days by address:

- Even Addresses: Monday, Thursday, Saturday only
- Odd Addresses: Tuesday, Friday, Sunday only
- All Addresses: No watering on Wednesdays

Additionally, watering is permitted between the hours of 12:00 p.m. and 8:00 p.m.

2.8.4 Citywide Strategies

On December 5, 2017 the City adopted its Climate Action Plan (CAP). The CAP is designed to reinforce the City's commitment to reducing greenhouse gas (GHG) ~~emissions, and~~ emissions and demonstrate how the City will comply with State's GHG emission reduction standards. The CAP includes an inventory of the City's GHG emissions, forecasts of future GHG emissions, monitoring and report processes, and options for reducing GHG emissions beyond State requirements that could be adopted at a future date, if so needed or desired.

Redlands has endorsed the U.S. Mayors Climate Protection Agreement, effectively establishing City policy to pursue environmental stewardship pertaining to a broad array of environmental programs and initiatives. The City has committed to exceed the target of reducing global warming pollution levels to seven percent below 1990 levels. The green policy initiatives that will be necessary to achieve this goal include land use policies that promote walkable communities, preserve open space and reduce sprawl; amenities that promote alternative transportation such as public transit, bicycle use, etc; use of alternative sources of energy and energy efficiency; sustainable building practices such as Leadership in Energy and Environmental Design (LEED) development; increased recycling rates; and the promotion of healthy urban forests and shade trees.

The City has implemented several other programs and actions to reduce energy use, increase efficiency and reduce waste:

- Electrical generation from landfill gas: The City installed a landfill gas (LFG) collection system and constructed a cogeneration facility for electricity generation from the LFG. This system currently generates approximately 700 KW to provide approximately 60-70 percent of the electrical demand of the Wastewater Reclamation Facility. The City temporarily discontinued use of the facility as a result of it failing a "smog test" and new AQMD ~~regulations, but~~ regulations but has since come back online. The 2035 General Plan contains policies directed at the investment in new infrastructure and technology for the reuse of methane gas emissions from the landfill.
- Conversion of the Solid Waste fleet to liquefied natural gas/compressed natural gas (LNG/CNG) alternative fuel: The City has replaced all of its trucks with LNG/CNG vehicles.

- Expansion of City recycling programs: As a result of expanded programs, and implementation of best practices and technology, the California Street Landfill has an extended lifespan of 2053.
- Ride share: The City promotes ride sharing among its employees through the Ride Share Time Off program.
- LED streetlights: The Municipal Utilities and Engineering Department installed LED lights in all existing traffic signals in the City and has established specifications for requiring LED lights in all new traffic signals. This action resulted in a 90 percent reduction in energy usage per traffic signal with a 3.7-year payback for the cost of installation. The City has been converting non-traffic streetlights and requires that LED light be installed during right-of-way improvement projects.
- Conversion of park irrigation controllers to SMART Controllers: In addition to saving water through changes in the park irrigation control system, the City also has a program to provide irrigation timer scheduling assistance to residents and businesses.
- Adoption of a Water Efficient Landscape Ordinance: Chapter 15.54 of the Municipal Code addresses water efficient landscape requirement throughout the City. This Chapter of the Code establishes a structure for planning, designing, installing, ~~maintaining~~maintaining, and managing water efficient landscapes in new construction and rehabilitated projects.

This Housing Element and the 2035 General Plan can support this City effort through promoting infill development; siting housing near transit, jobs, and services; requiring greenscaping; and encouraging the use of green building standards. The City has implemented policies to streamline the permit processing phase for LEED projects and the plan check process for residential rooftop solar. The 2035 General Plan contains a litany of policies and actions directed at sustainability in the Sustainable Community Chapter. Furthermore, through the future adoption of the proposed Transit Villages Specific Plan, the City is pursuing infill and transit- oriented development.

2.9 REGIONAL HOUSING NEEDS ASSESSMENT AND SPECIAL NEEDS

The housing element focuses on providing housing for extremely low-, very low-, and low-income households—a need that is often unmet by the housing market. All of these groups have a household income that is 80 percent or less of the countywide median. In many California communities, the market is not producing for-sale or rental units affordable to even moderate- income households. In Redlands, the match between income and housing cost has been closer for most households than in the coastal Los Angeles metropolitan area, but the dramatic rise in housing costs compared to incomes since the year 2000 has made the city less affordable.

This section of the housing element evaluates three types of housing need. First is a discussion of housing need by income, using the categories determined by SCAG and established in the Regional Housing Needs Allocation (RHNA). The second section analyzes the special needs of persons whose housing choices are limited by personal characteristics: seniors, large families, female- headed households, farmworkers, disabled persons, and families and persons in need of emergency shelter. The final section addresses the number of Redlands residents living in overcrowded conditions, a situation especially common to large, low-income renter-occupied households.

2.9.1 Current Housing Need

It is often difficult for lower income households to find affordable housing. Housing is considered affordable when a household spends 30 percent or less of its income on housing-related costs. Table 2-35, quantifies the housing need of extremely low-, low-, and moderate-income households in Redlands.

TABLE 2-35: HOUSING NEED BY INCOME LEVEL, 2017

| | Total Renters | Total Owners | Total Households |
|---------------------------|---------------|--------------|------------------|
| Extremely Low | 1,910 | 785 | 2,695 |
| with any housing problems | 1,375 | 520 | 1,895 |
| Cost Burden >30% | 1,335 | 510 | 1,845 |
| Cost Burden >50% | 1,185 | 440 | 1,625 |
| Very Low | 1,440 | 745 | 2,185 |
| with any housing problems | 1,260 | 560 | 1,820 |
| Cost Burden >30% | 1,255 | 555 | 1,810 |
| Cost Burden >50% | 895 | 390 | 1,285 |
| Low | 1,615 | 1,135 | 2,750 |
| with any housing problems | 1,340 | 540 | 1,880 |
| Cost Burden >30% | 1,265 | 480 | 1,745 |
| Cost Burden >50% | 285 | 225 | 510 |

Source: 2013-2017 HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2017

Extremely low- and low-income households are disproportionately likely to have housing-related problems (72% and 88%, respectively) and spend 30 percent or more of their incomes on housing (70% and 87%, respectively). In fact, 62 percent of extremely low-income households spend 50 percent or more of their incomes on housing. Across the board, larger percentages of renters spend 30 percent or more of their incomes on housing. This may be because more households who own bought their homes when they were more affordable or because the rental market is comparatively tighter.

2.9.2 Regional Housing Need Allocation

California Government Code Section 65584 requires SCAG to identify existing housing needs and to project needs in each of the region's jurisdictions at eight-year intervals. The 2021 Regional Housing Needs Assessment (RHNA) covers the period of October 15, 2021 to October 15, 2029. The RHNA is designed to incorporate population growth and change, employment patterns and commuting, and housing market problems. Housing elements must include policies and programs to meet the needs of all city residents.

The 2021 RHNA defines "existing need" as the number of households with one or more federally defined housing problem. The California Office of Housing and Community Development (HCD) characterizes existing need as: "The number of households overpaying for housing, living in overcrowded conditions, or with special housing needs, the number of housing units that need rehabilitation, and assisted affordable units at-risk of converting to market-rate." "Future need" is the number of units that would have to be added to accommodate forecasted growth in number of households by the end of October 2021, as well as the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an "ideal" vacancy rate of two percent for ownership units and five percent for rental units.

Future need is divided into five income categories (extremely low, very low, low, moderate, and above moderate), as defined by State and federal law. Table shows income categories for a family of four based on median income in San Bernardino County in 2021, as defined by HCD using federal guidelines. The SCAG allocations for Redlands in each category are shown for the 2006-2013, 2014-2021, and 2021-2029 RHNA projection periods.

The RHNA for Redlands estimates that 967 very low-income housing units are needed between 2021 and 2029. While the RHNA does not include a separate extremely low-income category, the City estimates that 50 percent (allowed per state methodology) of the projected housing need for very low-income households qualify as extremely low-income households. Therefore, the projected housing need for extremely low-income households during the 2021-2029 RHNA is estimated to be 483 units.

TABLE 2-362-36: REDLANDS REGIONAL HOUSING NEED ALLOCATION BY INCOME CATEGORY SCAG ALLOCATION, 2006-2013, 2014-2021, AND 2021-2029

| Category | Percent of County Median ¹ | 2021 Household Income | Housing Need 2006-2013 | Housing Need 2014-2021 | Housing Need 2021-2029 |
|-----------------------------------|---------------------------------------|-----------------------|------------------------|------------------------|------------------------|
| Extremely Low-Income ² | Less than 30% | Less than \$26,500 | 341 | 289 | 483 |
| | | | 12% ³ | 12% | 14% |
| Very Low-Income ² | 30-50% | \$26,500 - \$39,500 | 341 | 290 | 484 |
| | | | 12% | 12% | 14% |
| Low-Income | 50-80% | \$39,500 - \$63,200 | 469 | 396 | 615 |
| | | | 16% | 16% | 17% |
| Moderate-Income | 80-120% | \$63,200 - \$93,000 | 539 | 453 | 652 |
| | | | 19% | 19% | 19% |
| Above Moderate Income | Over 120% | More than \$93,000 | 1,155 | 1,001 | 1,282 |
| | | | 41% | 41% | 36% |
| Total Needed | | | 2,845 | 2,429 | 3,516 |

1. The 2013 County median for a family of four was \$62,600, as determined by HUD.

2. The very low-income housing need allocation provided by SCAG was 967 for the 2021-2029 RHNA. Projected housing need for extremely low-income households presumes that 50 percent of very low-income households qualify as extremely low-income households.

3. The percentages indicate percent of housing need that falls within the indicated income level.

Sources: California Department of Housing and Community Development; SCAG 2013.

HOUSING PRODUCTION UNDER THE PREVIOUS RHNA

The previous Housing Element addressed the RHNA that covered the years 2014 to 2021. As Table shows, only 19 percent of the housing allocation was met. See Section 5.2, Non-Governmental Constraints for further discussion. The majority of units produced were above moderate-income (446 units), followed by low-income (18 units), moderate-income (4 units), and very low-income (1 unit).

TABLE 2-372-37: HOUSING UNITS PRODUCED IN REDLANDS, 2014 - 2019

| Income Category | Regional Housing Needs Allocation | Total Units Produced | Results vs. RHNA |
|-----------------------|-----------------------------------|----------------------|------------------|
| Very Low Income | 579 | 1 | 578 |
| Low Income | 396 | 18 | 378 |
| Moderate Income | 453 | 4 | 449 |
| Above Moderate Income | 1,001 | 446 | 555 |
| Total | 2,429 | 469 | 1,960 |

Source: City of Redlands, Development Services Department, 2019

2.9.3 Special Housing Needs

For some types of households, limited income is not the only obstacle to finding satisfactory housing. Finding units of adequate size, location, and design can be especially difficult for the elderly, the disabled, large families, female-headed households, farmworkers, and the homeless. California Government Code Section 65583(a)(6) requires an analysis of the special housing needs of these groups. For people with special needs, a fundamental obstacle to determining unmet needs and providing assistance is establishing the number of special needs households. It should be noted that there is undoubtedly overlap among the numbers used in the discussion below. The U.S. Census and other data enumerating special needs households usually do not specify, for example, the number of migrant families that are large families or the number of elderly or disabled persons who are homeless. Table 2-38 lists households with special needs as of 2019.

TABLE 2-382-38: REDLANDS HOUSEHOLDS WITH SPECIAL NEEDS, 1990-2019

| Household Type | 2010 | | 2019 | |
|---|---------------|---------------|---------------|---------------|
| | Number | Percent | Number | Percent |
| Elderly | 5,443 | 22.0% | 8,076 | 30.9% |
| Disabled | NA | NA | NA | NA |
| Large Families (5 or More Members) | 2,662 | 11.0% | NA | NA |
| Overcrowded (>1.01 persons per room) | 895 | 3.7% | 830 | 4% |
| Female Head | 1,715 | 6.9% | 2,402 | 9.2% |
| Total Households | 24,764 | 100.0% | 26,115 | 100.0% |

1. Large family households and overcrowded households reported by American Community Survey.

Sources: 2010 U.S. Census; 2019 American Community Survey.

THE ELDERLY

Senior citizens are identified as a population in need of special housing because of physical constraints that require certain housing accommodations or modifications, and limited incomes that prevent many seniors from being able to afford the most suitable housing. Small units in proximity to services and transportation are desirable for many seniors. Other seniors who are able to live independently in their current homes can often benefit from financial assistance that helps them properly maintain their homes or make minor modifications for increased mobility. (Information on the number of seniors with disabilities is provided in the special needs section on persons with disabilities.)

According to the 2019 American Community Survey, the elderly population (those 65 and older) in Redlands represented 15.8 percent of the general population. Approximately 13.5% of all elderly households earned less than 30 percent of the surrounding area income.

In general, seniors are more likely to own rather than rent their homes—over three-quarters of seniors owned their homes in Redlands, according to the 2019 American Community Survey. Table 2-39 compares the tenure of senior households in the city and the county.

TABLE 2-39: ELDERLY HOUSEHOLDS BY TENURE, 2019

| Age | City | Percent | County | Percent |
|------------------------------|-------|---------|---------|---------|
| Owner-Occupied Units | | | | |
| Under 65 | 9,832 | 65.43% | 278,089 | 73.13% |
| 65 to 74 | 2,890 | 19.23% | 62,585 | 16.46% |
| 75 and over | 2,304 | 15.33% | 39,607 | 10.42% |
| Total Senior | 5,194 | 34.57% | 102,192 | 26.87% |
| Renter-Occupied Units | | | | |
| Under 65 | 7,997 | 84.04% | 224,922 | 87.94% |
| 65 to 74 | 735 | 7.72% | 18,901 | 7.39% |
| 75 and over | 784 | 8.24% | 11,937 | 4.67% |
| Total Senior | 1,519 | 15.96% | 30,838 | 12.06% |

Source: 2019 American Community Survey

Seniors make up a higher percentage of households in Redlands than in the county overall. Therefore, in general, seniors make up a larger percentage of owner and renter occupied households in Redlands as compared to the county.

Table shows the Redlands elderly population displayed by tenure and income level. Predictably, elderly households with the lowest incomes were more likely to rent than own their homes; this indicates a need for affordable rental units geared towards seniors.

TABLE 2-402-40: ELDERLY INCOME LEVEL AND TENURE, 2016

| Income Level | Elderly Renter- Occupied Households | Elderly Owner- Occupied Households | Total Elderly Households |
|---|--|---------------------------------------|-----------------------------|
| Below 30% of AMI | 510 | 395 | 905 |
| | 28% | 8% | 36% |
| 31-50% of AMI | 445 | 480 | 925 |
| | 25% | 10% | 34% |
| 51-80% of AMI | 300 | 555 | 855 |
| | 17% | 11% | 28% |
| 80% - 100% of AMI | 105 | 375 | 480 |
| | 6% | 8% | 13% |
| Above 100 Above 100% of AMI ¹ | 455 | 3,065 | 3520 |
| | 25% | 63% | 88% |
| Total | 1,815 | 4,870 | 6,685 |
| | 100% | 100% | 100% |

1. CHAS data does not distinguish between moderate and above moderate households.

Source: 2012-2016 CHAS Data ("Elderly" defined as age 62 and older), May 2013.

Existing developments designed specifically for seniors include the 170-unit congregate care facility, Mission Commons, built in 1989. Other affordable housing projects that house seniors within Redlands are: Citrus Arms with 61 units; Redlands Village Green, a 105-unit non-assisted (yet affordable) senior housing facility; Casa de la Vista, a 75-unit Section 202-income senior housing project completed in 1990, and Redlands Senior Housing 2 (Fern Lodge), a 62-unit Section 202 senior apartment complex. Two 51-unit low-income senior projects in Yucaipa were built by the San Bernardino County Housing Authority to aid seniors in the Redlands area. Heritage Partners also recently completed a 53-patient senior citizen assisted-living facility and American Baptist Homes of the West constructed a 12-bed Alzheimer's facility.

The following are senior housing projects that have recently been proposed, approved, or constructed that should provide additional affordable housing for seniors:

- 340-unit and 30 cottage senior care facility/assisted living on the northeast corner of 5th and Wabash (under construction). The 30 cottages have been constructed and are occupied and two of the seven planned buildings for congregate care are complete. Additionally, a 44,000 square foot congregate care facility with 42 units and a multiple purpose building that houses medical offices and social support facilities have also been constructed and are occupied.
- Vista del Sol, a 71-unit senior housing project on Webster Street at Lugonia Avenue (completed and 100 percent occupied).

To further assist in providing additional housing for senior citizens, the City enacted a Second Dwelling Unit ordinance in accordance with Government Code Section 65852.2, which was first adopted in 1982.

This code section allows special housing for senior citizens in any single-family district subject to approval of a "use permit."

As indicated in the list above, several senior assisted housing units will be constructed in the next few years, which will help to accommodate the need for senior housing. Because Redlands has an older, more affluent population, it seems likely that many seniors are well-off, and some of those having low-incomes are "income poor" but "housing rich;" that is, they may be living on a low fixed monthly income but have a higher net worth in real estate. Nevertheless, there are a number of senior homeowners (the exact number cannot be determined from available data) who live in older homes in need of repair or accessibility modifications, but who do not have the income or assets necessary to make those needed repairs or modifications. The City provides low interest loans and grants to address this need based on the policy that seniors who are able to live independently in their own homes should be assisted in doing so.

Finally, many services that target seniors are available to Redlands residents (Table 2-41).

TABLE 2-41-41: ELDERLY SERVICE ORGANIZATIONS

| Organization | Services(s) Provided | Phone Number |
|--|--|---|
| Joslyn Senior Center | Social, instructional, health and recreational services to Redlands residents age 50 and older; Computer lab; and Help groups. | (909) 798-7550 |
| Meals-on-Wheels | Delivers meals to homes of seniors, and homebound, disabled, frail or at-risk populations. | (909) 792-0716 |
| Redlands Senior Transportation Program | Wheelchair accessible van service available to residents who are 55 years of age and older or who are physically or mentally unable to utilize other forms of transportation. | (909) 798-7579 (Information) (909) 335-9660 (Reservations) |
| San Bernardino County Department of Aging and Adult Services | Adult Protective Services Program; Family Caregiver Support Program; In-Home Supportive Services; Linkage Programs; Long- Term Ombudsman Program; Multipurpose Senior Services Program; Nutrition Services; Senior Training and Employment Program; Senior Information and Assistance Hotline. | (909) 891-3900 (Department) (800) 510-2020 (Senior Information & Assistance) |
| San Bernardino County Food Bank | Distributes food at sites all over the county; in Redlands, the first Friday of the month at Church on the Hill and the last Friday of the month at Salvation Army | (909) 723-1580 |

Source: City of Redlands, Community Development Department, 2008.

THE DISABLED

Disability data also provides valuable context for assessing current and future need for accessible housing units. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate.

U.S. Census defines a “disability” as “a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.”

Of individuals with disabilities, 4,465 (43.8%) were seniors. Individuals with ambulatory or independent living difficulties represented the most common disabilities, as reported in Table .

For those of working age, disabilities can also restrict the type of work performed and income earned. In fact, according to the 2009-2011 ACS, 60 percent of individuals over 16 with a reported disability were not in the labor force; 36 percent were employed; and 4 percent were unemployed (i.e., looking for work).

TABLE 2-422-42: INDIVIDUALS WITH DISABILITIES IN REDLANDS

| | Youth (Age 5-17) | Adults (Age 18-64) | Seniors (Age 65+) | Total |
|---|---------------------|-----------------------|----------------------|--------|
| Individuals Reporting One or More Disabilities: | 1,019 | 4,710 | 4,465 | 10,194 |
| With hearing difficulty | 80 | 857 | 1,740 | 2,677 |
| With vision difficulty | 0 | 459 | 74 | 533 |
| With cognitive difficulty | 1,019 | 2,754 | 1,625 | 5,398 |
| With ambulatory difficulty | 0 | 1,450 | 2,904 | 4,354 |
| With self-care difficulty | 0 | 777 | 777 | 1,554 |
| With independent living difficulty | N/A | 2,659 | 2,432 | 5,091 |

Note: Columns do not sum to total individuals row because individuals may report more than one disability.

Source: ~~2019 American~~ 2019 American Community Survey.

[The current definition of family is “an individual, or two \(2\) or more persons related by blood, marriage or adoption, or a group of not more than five \(5\) persons, excluding servants, who are not so related, living together as a single housekeeping unit in a dwelling unit” \(Ord. 1000 § 6.20, 1955\). This definition may pose a constraint to groups of more than unrelated persons living together. To mitigate this constraint, Program 01.2-17 included to amend the definition of family in the municipal code such that it will no longer pose a constraint.](#)

DEVELOPMENTALLY DISABLED PERSONS

According to Section 4512 of the California Welfare and Institutions Code a “developmental disability” is a disability that originates before an individual reaches adulthood (18 years old), continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. This includes intellectual disabilities (characterized by significantly sub-average general intellectual functioning), cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to other intellectual disabilities or that require treatment (i.e., care and management) similar to that required by individuals with intellectual disabilities, however it does not include other handicapping conditions that are solely physical in nature.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. In Redlands, the most commonly occurring disability amongst seniors 65 and older was an ambulatory disability, experienced by 18.5% of Redlands's seniors

The California Department of Developmental Services (DDS) supports approximately 330,000 children and adults with developmental disabilities and 41,000 infants at risk of developmental delay or disability throughout the state. Services are provided through state-operated developmental centers and community facilities, as well as through contracts with 21 non-profit agencies called regional centers. The Inland Regional Center located in San Bernardino is the largest regional center in California providing services to more than 25,000 individuals with developmental disabilities in San Bernardino and Riverside counties. The regional center is a private, non-profit community agency that contracts with local business to offer a wide range of services to individuals with developmental disabilities and their families.

Table below summarizes persons with development disabilities in Redlands. Persons with development disabilities represent less than 0.7 percent of the city's population.

TABLE 2-432-43: PERSONS WITH DEVELOPMENTAL DISABILITIES IN REDLANDS

| | | |
|--------------|--------------------------------|-------|
| By Residence | Home of Parent/Family/Guardian | 466 |
| | Independent/Supported Living | 56 |
| | Community Care Facility | 21 |
| | Intermediate Care Facility | 56 |
| | Foster/Family Home | 10 |
| | Other | 10 |
| By Age | 0-17 Years | 619 |
| | 18+ Years | 273 |
| Total | | 1,511 |

Source: SCAG Precertified Housing Data, 2021.

There are a number of housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving the needs of this group. Incorporating 'barrier-free' design in all, new multi-family housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents.

Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

LARGE HOUSEHOLDS

Large households are characterized as a special needs group because they require a greater number of rooms per dwelling unit to avoid overcrowding. In addition, many large households are low-income and cannot afford dwelling units with three or more bedrooms without paying more than 30 percent of their income for housing expenses.

According to the 2014-2018 ACS, 11 percent of households had five or more persons (approximately 2,705 households). In total, about 11 percent of all households in Redlands had five or more persons in 2019. Thus, the vast majority of households over five were made up of related persons. In 2011, around 55 percent of large households in Redlands owned their own home. About 45 percent of large households are renters, primarily because they are lower-income and cannot afford to purchase a home.

The ACS also indicates that approximately 17 percent (2,479 units) of rental units had three or more bedrooms (Table 2-44). Table 2.5-3 in Section 2.5 shows that there were 845 renter-occupied households of 5 persons or more in 2011 in Redlands. While these could be family and non-family households, it is not relevant to address the needs of large households, as familial status is not included in the definition of a large household. Moreover, assuming that these households rent apartments with three or more bedrooms, large households in Redlands would inhabit approximately 34 percent of the city's rental units with three or more bedrooms.

While the preceding information indicates that housing for large households does exist in Redlands, available affordable units may be difficult to find. For example, a low-income five-person household would be able to afford a housing expenditure of \$1,448 per month. According to the survey of Craigslist listings cited in Table 2.4-7, the median rent for a three-bedroom unit in Redlands was \$2,275. Given that there are households in Redlands that have even lower incomes, many large households may have difficulty finding housing in the city. A steady increase in household size since 1990 may be correlated with an increase in large families and low-income large families in need of subsidized housing as well as the increasing trend of multi-generational living arrangements. Moreover, as a group, large households have a higher incidence of overcrowding because it is more difficult to secure affordable rental housing of adequate size to meet a large household's needs.

TABLE 2-44: UNITS WITH THREE OR MORE BEDROOMS BY TENURE

| Number of Bedrooms | Owner-Occupied Units | Renter-Occupied Units | Total |
|-----------------------|----------------------|-----------------------|--------|
| Three bedrooms | 6,374 | 1,509 | 7,883 |
| Four bedrooms | 6,369 | 252 | 6,621 |
| Five or more bedrooms | 1,124 | 155 | 1,279 |
| Total 3+ bedrooms | 13,867 | 1,916 | 15,783 |
| Percent of Total | 87.9 | 12.1 | 100 |

Source: 2019 American Community Survey.

EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely low-income households are those with incomes less than 30 percent of the AMI. In 2019, the AMI in San Bernardino County was \$63,362, while the AMI in the City of Redlands was \$74,839. An income under \$26,000 is considered extremely low-income.

Extremely low income households have disproportionate and unique housing needs when it comes to housing supply, cost, and size. An analysis of household characteristics examining trends and the availability of resources is shown in [Table 2-45](#).

Table 2-45: Extremely Low-Income Households experiencing Cost Burden or Overcrowding by Tenure

| | Cost-Burdened | Overcrowding |
|-----------------|---------------|--------------|
| Owner-Occupied | 91.1% | 2.6% |
| Renter-Occupied | 83.05 | 14.7% |
| All | 85.3% | 11% |

Source: HUD CHAS Data 2014-2018

FEMALE-HEADED HOUSEHOLDS

The 2000 Census shows 1,823 female-headed households with children under 18, about 23 percent of all households with children. By 2010, this number had slightly decreased to 1,715, making up 23 percent of all households with children. By 2018, this number again slightly decreased to 1,683, making up 20 percent of all households with children. The Housing Authority of San Bernardino County reports the vast majority of the Section 8 households in Redlands are headed by women.¹

A large share of female-headed households with children are economically disadvantaged. Table identifies that a significant number of female-headed households (primarily single mothers) were below the poverty level in 2011. There were approximately 54 percent more impoverished female-headed households as married couple families below the poverty level, even though the number of married couples was much greater. Although the percentage of all Redlands households below the poverty level was fairly low, about 28 percent of female-headed households with children were below the poverty level. These households made up 13 percent of all female-headed households. These households have a need for low- cost housing, suitable for children located near schools and childcare. Innovative shared living arrangements that might include congregate cooking and childcare facilities would also be suitable.

TABLE 2-462-45: HOUSEHOLDS BELOW POVERTY LEVEL, 2020

| | Family/Householder | Percent of Total Households |
|--|--------------------|-----------------------------|
| Total households in poverty. | 1,373 | 5.7% |
| Female householder, no husband present. With related children under 18 years. | 477 | 3.0% |

Source: 2019 American Community Survey.

THE HOMELESS

The SCAG defines the homeless as those "sleeping out" in makeshift shelters, in cars and under freeway overpasses, and those who are "at-risk" of homelessness in that they are sharing housing on a temporary basis, are living in single-room occupancy hotels, or their Calworks or other general relief stipend has been canceled twice within one year because they had no forwarding address.

According to the 2020 San Bernardino County Homeless Count and Subpopulation Survey Report there were 3,125 persons who were counted as homeless in the county on Thursday, January 23, 2020. In Redlands a total of 186 homeless people were counted, the majority of which were unsheltered (141) persons. Of the unsheltered homeless population in Redlands, 55 percent were substance abusers, 32 percent were mentally ill, 8.4 percent were victims of domestic violence, 25 percent were persons released from jails or prison during the past 12 months, 62 percent were chronically homeless, 11 percent were youth under 18 years of age (unaccompanied by an adult), 50 percent were youth ages 18 to 24, and 8.4 percent were U.S. Veterans. In total, the Redlands homeless population makes up 3 percent of the county total.

TABLE 2-472-46: HUD 2020 CONTINUUM OF CARE SAN BERNARDINO COUNTY HOUSING INVENTORY COUNT

| | Total Year Round Beds | Seasonal Beds | Overflow / Voucher |
|---|-----------------------|---------------|--------------------|
| Emergency, Safe Haven and Transitional Housing | 693 | 79 | 0 |
| Emergency Shelter | 483 | 79 | 0 |
| Safe Haven | 24 | n/a | n/a |
| Transitional Housing | 186 | n/a | n/a |
| Permanent Housing | 3,704 | n/a | n/a |
| Permanent Supportive Housing* | 1,603 | n/a | n/a |
| Rapid Re-Housing | 2,101 | n/a | n/a |
| Grand Total | 4,397 | 79 | 0 |

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report

Non-Profit Services

There are several non-profit organizations in and near Redlands that attempt to address/assist the homeless on a daily basis. The majority of these organizations tend to focus on the homeless family. These entities include the Redlands Family Service Association, the Frazee Shelters, Inland Temporary Homes, Option House, and the Salvation Army. In addition, the 2-1-1 referral line operated by the Inland Empire United Way services the city.

Family Service Association (FSA) provides transitional housing for families via rental assistance and shelter vouchers. Additionally, through the Housing Advocacy Program FSA provides emergency support, case management, and education to families and individuals in Redlands.

The Blessing Center provides free food and clothing to over 900 families each week. One large food box, worth in excess of \$75 of quality food products, is distributed to each family once a week. Client families can shop for free clothing, baby care and other items, which are also available during food distribution. The Blessing Center also provides client families with much needed medical and dental services by a team of doctors and nurses, ~~dentists~~dentists, and dental technicians. Services to homeless individuals and families include bagged lunches, clothing, hygiene items and other resources. Dinner for the Homeless is every last Wednesday of the month.

The Blessing Center's Resource Center serves to assist job seekers in pursuing potential employment opportunities through resume writing, filling out employment applications, interview coaching and even providing proper clothing for job interviews. Classes in job training, E.S.L, G.E.D, and S.A.T. tutorial are also offered. A dedicated team of coaches and mentors are available to help clients obtain basic requirements such as an identification card, social security cards, etc.

The Frazee Shelters are part of a larger organization—the Frazee Community Center. The Community Center provides a wide range of services to low-income and homeless persons in the San Bernardino area. Services include housing assistance, clothing, nutrition, as well as referral services. Frazee is a non-profit corporation and receives funds from United Methodist Churches and other denominations as well as Arrowhead United Way, East Valley United Way, and the City and County of San Bernardino, City of Highland, City of Redlands. Frazee also receives grants and donations from individuals, corporations, and other organizations. Frazee operates three shelters— two veteran's shelters for men in San Bernardino and one women's shelter in Highland. In ~~addition~~addition, Frazee offers a no-cost lunch to those in need during the weekdays.

Inland Temporary Homes operates a homeless shelter that provides housing to six families with a maximum stay of 90 days as well as transitional housing to 20 families (16 single family units and four attached units) with a maximum stay of two years. Inland Temporary Homes also provides various services including case management, career counseling, mental health counseling, and follow-up services for families that complete the shelter program but do not enter the transitional housing program.

Option House provides services to women and children who are victims of domestic violence. In addition to shelter services, Option House offers in-house classes, legal advisors, support groups, and treatment for a range of issues. The organization helps over 300 people in its shelter and over 200 with legal services.

The Salvation Army provides the homeless (families, individuals with children, and women) with daily meals, day care, and some monetary assistance. In addition, they assist families with counseling, motel vouchers, money for gasoline, prescriptions, utility bills, and toiletries. Currently, the San Bernardino location provides 48 families with transitional housing ranging from 30 days to three years as well as 14 emergency shelter units that are made available on a day-to-day basis. The Redlands location is a cold weather shelter that operates December 31st to March 31st and has capacity for 52 individuals and families.

Central City Lutheran Mission is a cold weather shelter that operates during the months of November through April. The shelter provides meals and bedding to 72 men each night.

In addition to these local organizations, the Community Action Partnership provides a number of programs and services aimed at low-income and homeless populations.

The Inland Empire United Way (IEUW) runs a hotline for San Bernardino and Riverside counties. Those who are in danger of homelessness or already homeless can call 2-1-1 if they are in need of food, shelter, or assistance paying their rent and utilities. The 2-1-1 service also makes referrals for animal care, disaster resources, help for elderly veterans, clothing, disability programs, low-cost child and medical care, job training, and governmental programs.

Public Programs

The housing and social service needs of homeless persons are as varied as their reasons for being homeless. These include unemployment, eviction, physical or mental illness, and substance abuse. Many homeless persons need counseling, employment assistance, and shelter. Some need only temporary, transitional shelter. Others may need only short-term financial assistance such as a loan for the first month's rent and security deposit.

The City of Redlands currently has no public programs for serving the homeless. The City, however, is able to have some impact upon availability of housing via its General Plan and related policies. As the problem of homelessness continues to grow statewide, City policy makers may need to consider potential public programs to assist with the homeless. Emphasis is currently aimed at assisting those agencies already in the community through financial assistance from CDBG funds. Currently, the City has allocated CDBG funds to Inland Temporary Homes and the Family Service Center of Redlands.

FARMWORKERS

The City of Redlands is known for its citrus groves which bring employment to agricultural workers in the area. The 2010 US Census indicated there were 176 residents of Redlands employed in the agriculture, forestry, and fishing industry, and in 2019 this population was estimated to be 128 people. Of the City's 138 total jobs in the agriculture, forestry, fishing, and hunting industry, 55 may be considered full-time, year-round, non-seasonal positions. Agriculture, forestry, and fishing industry does not make up a large percentage of employment in the City; therefore, farmworker housing need can be met through general affordable housing programs.

[The most recent Data from the United States Department of Agriculture's National Agriculture Statistics Service indicates that in San Bernardino County there are an estimated 2,246 people hired as farmworkers in the year 2017². Of these, an estimated 546 were migrant workers.](#)

[Pursuant to the Health and Safety Code 17021.5 and 17021.6, farmworker housing for fewer than six individuals should be treated as a single-family home and not require a discretionary approval. Agricultural employee housing with no more than 36 beds in a group quarters or 12 units designed for the use of a single household is permitted by right in agricultural land-use designations. The Redland's code does not currently allow farmworker housing within its agricultural districts. Program 1.2-18 is included](#)

² US Department of Agriculture National Agriculture Statistics Service, San Bernardino County:
<https://quickstats.nass.usda.gov/results/5504D8CE-0FB5-35D3-A1A4-ECBEB702FCD2>

[to amend the code to allow for farmworker housing within all agricultural zones throughout the City in compliance with the Employee Housing Act.](#)

STUDENTS

The University of Redlands, located north of Interstate 10, has approximately 4,931 students. About 65 percent of these (3,206) are undergraduates, the vast majority of whom live on campus. Undergraduates are only allowed to live off campus if they are married, their parents live in town, or if they have some other extenuating circumstance. The University has graduate programs in business and education, making up the remaining 35 percent (1,725) of the student body. Many of these students live in [Redlands](#), and [Redlands](#) and seek rental units.

OVERCROWDING

The Census Bureau defines “overcrowding” as 1.01-1.50 persons per room and “extreme overcrowding” as 1.51 or more persons per room. Overcrowding typically results when either: 1) the costs of available housing with a sufficient number of bedrooms for larger families exceeds the ability to afford such housing, or 2) unrelated individuals (such as students or low-wage single adult workers) share dwelling units due to high housing costs. This can lead to overcrowded situations if the housing unit is not large enough to accommodate all of the people. In general, overcrowding—a measure of the ability of existing housing to adequately accommodate residents—can result in deterioration of the quality of life within a community.

Table and Table summarize the overcrowding status in the City. In 2000, 7 percent of the city’s occupied housing units were overcrowded. In 2011, according to ACS estimates, this number had fallen to 4 percent, and in 2018 this number was remained approximately 4 percent.

In Redlands, 369 owner-occupied and 865 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. 67 owner-occupied households and 277 renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding.

In 2000, according to Table 2-48, 4 percent of Redlands households were overcrowded and 3% were extremely overcrowded. By 2011, according to ACS estimates, 3% of households were overcrowded and less than 1% were extremely overcrowded. And by 2019, according to ACS estimates, 2% of households were overcrowded and another 2% were extremely overcrowded.

TABLE 2-48-47: OVERCROWDING: PERSONS PER ROOM

| Persons | 2000 | | 2011 | | 2018 | |
|--------------|------------|---------|------------|---------|------------|---------|
| | Households | Percent | Households | Percent | Households | Percent |
| 1.00 or less | 22,000 | 93% | 23,362 | 96% | 25,088 | 97% |
| 1.01 to 1.50 | 873 | 4% | 693 | 3% | 441 | 2% |
| 1.51 or more | 796 | 3% | 202 | 1% | 389 | 2% |

Source: 2000 U.S. Census and 2011 and 2019 American Community Surveys.

2019 data is approximate.

TABLE 2-492-48: OVERCROWDED HOUSING BY TENURE

| | San Bernardino County | | Redlands | |
|---------------------------------|-----------------------|-----------------|----------------|-----------------|
| | Owner Occupied | Renter Occupied | Owner Occupied | Renter Occupied |
| Total: | 386,204 | 252,443 | 16,172 | 9,745 |
| 0.50 or less occupants per room | 238,685 | 107,481 | 12,508 | 5,573 |
| 0.51 to 1.00 occupants per room | 125,456 | 107,301 | 3,486 | 3,523 |
| 1.01 to 1.50 occupants per room | 15,721 | 27,239 | 0 | 429 |
| 1.51 to 2.00 occupants per room | 5,197 | 8,737 | 178 | 220 |
| 2.01 or more occupants per room | 1,145 | 1,685 | 0 | 0 |

Source: 2019 American Community Survey.

3 HOUSING RESOURCES & SITES INVENTORY

3.1 INTRODUCTION

The purpose of the adequate sites inventory and analysis is to identify specific sites suitable for residential development to allow for a comparison of the Regional Housing Needs Assessment (RHNA) with realistic development capacity. The RHNA is broken down by income group into four categories: very low (less than 50% of area median income [AMI]), low (50-80% of AMI), moderate (81-120% of AMI), and above moderate (over 120% of AMI). While a jurisdiction must show that it has adequate sites in total to meet its RHNA, it must also show that it can meet the allocation at each of these income categories.

3.2 REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)

A housing element must identify specific parcels of land that are available for residential development. Department of Housing and Community Development (HCD) guidance also states that the inventory can include sites that are in the process of being made available for residential development, “provided the housing element includes a program that commits the local government to completing all necessary administrative and legislative actions early in the planning period.” The RHNA projection period for this Housing Element is from October 2021 to October 2029.

The Southern California Association of Governments (SCAG) adopted its RHNA in March 2021 for the 6th Cycle Housing Element. The housing allocation is not a production requirement but illustrates the goals for each community to accommodate through appropriate policies and land-use regulations. Allocations are intended to ensure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

The City of Redlands’ share of the RHNA requirement for 2021-2029 is:

TABLE 3-13-1: RHNA ALLOCATION (2021-2029)

| Very Low | Low | Moderate | Above Moderate | Total |
|----------|-----|----------|----------------|-------|
| 967 | 615 | 652 | 1,282 | 3,516 |

3.2.1 Buffer

Recent changes to state law have required cities to continually maintain adequate capacity in their sites inventories to meet their RHNA. In the event that a site is developed below the density projected in the element, or at a different income than projected, or that a site is developed with a non-residential project, the City must have adequate sites available to accommodate the remaining balance of the RHNA, or it must identify and rezone for new sites that can accommodate the remaining need. For these reasons the City is including an additional buffer of 20 percent above the RHNA in each category. Redlands is planning to accommodate a total of 4,218 new units through its sites inventory to provide an adequate buffer to avoid and minimize the risk of “no net loss.”

TABLE 3-23-2: RHNA WITH BUFFER

| | Very Low | Low | Moderate | Above Moderate | Total |
|--------------------------|----------|-----|----------|----------------|-------|
| RHNA | 967 | 615 | 652 | 1,282 | 3,516 |
| 20% Buffer | 193 | 123 | 130 | 256 | 703 |
| Total with Buffer | 1,160 | 738 | 782 | 1,538 | 4,219 |

3.3 CREDITS TOWARD THE RHNA

Housing units that are approved, under construction, or developed with building permits issued after June 30, 2020, can be credited toward the 6th Cycle RHNA.

3.3.1 Entitled Projects

Projects that were approved but had not been issued building permits prior to July 1, 2021, are included in the RHNA as credits. The list of approved projects by income level is included in Table 3-3. In total, the City has recently approved 791 units (711 above-moderate units and 80 low-income units), which are expected to be constructed during the 6th Cycle production period.

TABLE 3-33-3: APPROVED UNITS

| Project Name | Description | Status | Number of Units | Income |
|---------------------------|---|--|-----------------|----------------|
| Luxview Apartments | 328 unit apartment complex on 21.8-acre site. | Approved by City Council in October 2019. Not yet built. | 328 | Above Moderate |
| Bouye Tract (TTM 20065) | 29 single-family homes on 10.44 acres. | Approved by City Council in September 2019. Not yet built. | 29 | Above Moderate |
| Liberty Lane ¹ | Approved low-income units. Developer stated intent to maintain affordability of units for low income veterans, particularly those needing assistance. | Approved in 2017. Not Yet Built. | 80 | Lower |
| Heritage Specific Plan | 207 above moderate-income units. | Approved. Not yet built. | 207 | Above Moderate |
| Casa Loma Apartments | 147 multi-family residential units on 5.7 acres. | Approved. Not yet built. | 147 | Above Moderate |
| Total | 791 | | | |

[The Liberty Lane Project is approved for 80 affordable units for low-income veterans. Multiple approvals, including the Conditional Use Permit, a Memorandum of Understanding between the Developer and U.S. Veterans Initiative specify that the units are to remain affordable for lower-income veterans.](#)

Source: City of Redlands, Development Services Department

3.4 PENDING PROJECTS

In addition to projects that have already been approved, the City is currently processing entitlements for another 1,325 units. The City anticipates that these projects will be approved and constructed during the 6th Cycle planning period. The list of projects undergoing review is included in Table 3-4. These will be counted as above moderate units.

TABLE 3-4: APPLICATIONS IN REVIEW

| Project Name | Description | Status | Number of Total Units |
|-----------------------------|--|--|-----------------------|
| Citrus Greens Specific Plan | 20 units of age-restricted senior single-family housing on 5 acres in a gated community. | Application complete. | 20 |
| Bergamot Specific Plan | Subdivide the approximately 58 acres into 317 single-family residential lots. The project is divided into three neighborhoods: Neighborhood 1 is approximately 15 acres, has a minimum lot size of 7,200 square feet and contains 53 lots; Neighborhood 2 is approximately 12 acres, has a minimum lot size of 3,500 square feet and contains 144 lots; and Neighborhood 3 is approximately 19 acres, has a minimum lot size of 1,900 square feet and contains 120 lots. | Entitlement in process. Not yet approved. | 317 |
| Redlands Mall | Transit-oriented development with mixed uses (residential, retail, and office) on 11 acres in downtown Redlands. | Development proposed, undergoing entitlement review, not yet approved. | 700 |
| City Center Mixed Use | Mixed use project with residential, retail, and restaurant uses. | Development proposed, undergoing entitlement review, not yet approved. | 138 |
| The Grand Apartments | Multifamily residential project downtown near the train station. | Development proposed, undergoing entitlement review, not yet approved. | 150 |
| Total | | | 1,3425 |

3.4.1 Redlands Mall Redevelopment

The Redlands Mall site The Redlands Mall site located within the City's downtown core. It is ripe for redevelopment and is a prominent opportunity site for housing. It is approximately 11.15 acres in size and bounded by Redlands Boulevard (north), Orange Street (east), Citrus Avenue (south), and Eureka Street (west). The project proposal includes an adjacent 1.1-acre parcel at the southeast corner of Citrus Avenue and Eureka Street for the proposed relocation of CVS Pharmacy, which currently holds a long-term lease at the Mall site.

Presently, the Mall site is limited to 18 dwelling units per acre (du/ac) and a maximum building height of three stories. The policy regulating these standards, Measure U, provides certain exceptions, one of which is to exempt “development directly related to proposed Metrolink/ Arrow light rail stations in the City of Redlands, including one at the University of Redlands.” The Mall site is approximately 650 feet south of the Santa Fe Depot train station at its closest point (with three routes of pedestrian access available along Third Street, Orange Street, and Eureka Street), and approximately 1,200 feet south of the Santa Fe Depot train station at its farthest point. The property at the southeast corner of Citrus Avenue and Eureka Street is approximately 1,300 feet south of the Santa Fe Depot train station at its farthest point, which is no more than one-quarter mile from the Metrolink/Arrow train platforms.

On May 18, 2021, the Redlands City Council adopted Resolution 8215 determining that a proposed mixed-use and transit-oriented development project for the Redlands Mall site and associated adjacent properties qualify for exemption from the Redlands General Plan provisions established by Measure U. This decision enables the City to consider project entitlements that would exceed the 18 du/ac and 3-story building height for high-density residential developments.

The development proposed for the Mall site includes the following components:

- Demolition of existing on-site buildings and improvements
- Multiple mixed-use buildings with an average of four stories, with actual heights ranging from three to five stories
- Up to 700 multi-family dwelling units (apartments and condominiums), to include live/work, studio, one-bedroom, two-bedroom, and three-bedroom units ranging between 475 and 1,500 square feet each
- A 6,000-square-foot recreational amenity building including pool
- Up to 73,000 square feet of commercial floor area on ground floors to include retail and restaurant uses, as well as a rooftop restaurant
- Up to 12,000 square feet of office space on upper floors
- A pedestrian plaza totaling approximately 16,500 square feet on Third Street
- A parking structure with 780 spaces on four levels above ground level (i.e., approximately four stories high with rooftop parking on fifth level)
- Two subterranean parking structures
- Public and private open space areas to include landscaping, shade trees, street trees, and pedestrian improvements
- Related site improvements to include sidewalks, driveways, landscape, lighting, flood prevention, and public and private utility connections

The proposal includes an extension of State Street westerly of Orange Street to reestablish its historical connection to Third Street. A new extension of Third Street (north-south) will reestablish a public street between Redlands Boulevard and Citrus Avenue. This will result in smaller blocks with shorter block lengths more amenable to pedestrian traffic (similar to the existing historical blocks along East State Street) and should also result in slowing motor vehicle traffic through the site.

The project will act as a catalyst for additional residential and mixed use development downtown and demonstrates the desire and feasibility of achieving higher densities around the three train station sites in Redlands consistent with the community’s vision in the 2035 General Plan.

3.5 ACCESSORY DWELLING UNITS

State laws passed in 2017 and 2019 have legalized accessory dwelling units (ADUs) across California. Since these laws were passed, the City has seen increased interest and ADU construction. In 2017, the City issued two (2) ADU permits, three (3) in 2018, eleven (11) in 2019, and fifteen (15) in 2020. The significant growth in ADUs indicates that the City can reasonably expect increased ADU production above the 2020 rate through the duration of the cycle, especially since the Covid-19 pandemic essentially shut down most permitting and construction during the second quarter of 2020. However, for the purposes of the sites inventory, the City is utilizing an annual approval rate of 15 ADUs based on the most recent evidence in 2020. The most recent annual production rate of 15 ADUs indicates that approximately 120 ADUs will be constructed in the City over the 6th Cycle. While the City’s average permitted ADUs from 2017 to 2020 was lower than 15, additional changes in state law in 2019 accelerated ADU production. The City has experienced robust ADU permitting during 2021 at roughly 15 units. Production during 2020 and 2021 is most representative of the future production, given the similar regulations and growing homeowner interest.

To spur further production of ADUs, the City is including programs specifically designed to continue progress on ADU production. Programs 1.6-1 will create a comprehensive ADU education campaign, providing easy, how-to guides for homeowners interested in- ADUs, and direct promotion of ADUs and City assistance to residents. Program 1.6-2 will develop pre-approved ADU plan sets that residents will be able to use for free, reducing the cost and time necessary to obtain an ADU permit. Program 1.6-3 will update the ADU ordinance to match the most recent changes in state law. Most importantly, Program 1.6-4 includes a commitment to carefully track ADU production by income, and to implement additional strategies or revise the RHNA estimates if production does not meet the expectations presented below. The recent ADU production, resources, incentives, and contingency plan for lower production all demonstrate that the assumption of 15 ADUs per year is feasible and realistic for the 6th Cycle.

Importantly, the City will meet its RHNA for all income levels without ADUs – the ADUs credited towards the RHNA demonstrate realistic expectations based on recent trend data. Additionally, the City is committing to monitoring its ADU permitting throughout the cycle. If the trends indicate that ADU production is significantly less than anticipated and additional sites are needed, the City will adjust its RHNA strategy as necessary to ensure that adequate sites are available for all income levels throughout the planning period.

TABLE 3-53-5: RECENT ADU PRODUCTION

| Year | 2017 | 2018 | 2019 | 2020 | 2021* |
|----------------|------|------|------|------|-------|
| ADUs Permitted | 2 | 3 | 11 | 14 | 11 |

* As of June 1, 2021.

In December 2020, SCAG published a study estimating the affordability of ADUs in Southern California. Table illustrates the total ADUs anticipated by income category over the 6th Cycle, based on the SCAG ADU affordability analysis for San Bernardino County and a production rate of 15 ADUs/year.

TABLE 3-63-6: PROJECTED ADUs BY AFFORDABILITY

| Income Level | Extremely Low/Very Low | Low | Moderate | Above Moderate | Total |
|------------------------------|------------------------|-------|----------|----------------|-------|
| Percent of ADUs ¹ | 22.7% | 34.8% | 34.8% | 7.7% | 100% |
| Projected ADUs | 27 | 42 | 42 | 9 | 120 |

Source: SCAG Regional Accessory Dwelling Unit Affordability Analysis. December 2020.

3.6 SITE CAPACITY ANALYSIS

3.6.1 Recent Developments and Project History

The City has experienced a variety of both single-family and multi-family residential projects in recent years. While many projects have been larger single-family tract homes developed through the City's Planned Residential Development program (codified in Title 18, Zoning Regulations, of the Redlands Municipal Code), several multi-family projects have also been constructed or proposed.

3.6.2 Multi-Family Trends

The City allows multi-family development in its R-2, R-3, C-3, C-4, A-P (Administrative & Professional Office), and T (Transitional) zones. R-2 and R-3 are exclusively residential zones; no commercial or industrial development is allowed. The remaining zones allow for full commercial/office, full residential (in A-P and T zones), or mixed residential and commercial uses. While the City did not experience significant production of mixed-use residential during the 5th Cycle, the anticipated Transit Villages Specific Plan will catalyze redevelopment adjacent to the new Metrolink/Arrow light rail stations and incentivize new housing development in downtown Redlands.

The City has recently approved/permitted six multi-family developments totaling 830 units, achieving a range of densities and affordability levels (Table 3-7).

TABLE 3-73-7: RECENT MULTI-FAMILY PROJECTS

| Housing Type | Project Name & Affordability | Zoning | General Plan | Density | Acres (Gross) | Units | Yield % | Status |
|----------------------|---|--------------|--------------|-------------|---------------|-------|---------|----------------------------------|
| MFR | HACSB SP 61 Affordable Housing | SP61 | MDR | 15 | 19.2 | 228 | 79% | Built |
| MFR | Luxview Apartments Market Rate Housing | EV/2500RM | MDR | 15 | 21.8 | 328 | 100% | Approved 2019 |
| MFR | Villa Bonita Condominiums Market Rate Housing | EV 3000 RM | MDR | 18 | 4.2 | 39 | 51% | Built |
| MFR | Brookside Apartments Market Rate Housing | A-P | Office | 10 | 0.34 | 8 | 80% | Approved 2019 |
| MFR | Liberty Lane Affordable Housing for veterans, individuals with special needs, and low-income families | R-2 | MDR | 15 | 4.72 | 80 | 113% | Approved 2017, pending financing |
| MFR | Casa Loma Apartments Market Rate Housing | Proposed R-3 | Proposed HDR | Proposed 27 | 5.7 | 147 | 95.5% | Approved 2021 |
| Average Yield | | | | | | | 86.41 % | |

Two projects affordable to lower-income residents are identified in Table . The Liberty Lane project was approved in 2017 but has yet to be constructed. Liberty Lane took advantage of a density bonus to achieve a yield of 113 percent of the maximum allowed by the underlying zoning. The Housing Authority of the County of San Bernardino constructed 228 units of housing affordable to lower-income households in “Housing Authority of the County of San Bernardino Specific Plan No. 61” and achieved a yield of 79 percent. Together, these affordable projects averaged a yield of 96 percent allowed by the zoning.

Overall, multi-family projects have average yields of 86.4 percent of the maximum allowed by the underlying zoning. While most of the recent multi-family developments have been at medium densities, the Casa Loma Apartments project, recently approved by City Council, has a higher yield at nearly 96

percent. Based on these recent trends, the City presumes a realistic yield of approximately 80 percent of the maximum for sites in multi-family residential zones for the 6th Cycle sites inventory.

3.6.3 Tract Maps and PRD Trends

Most recent residential growth in Redlands has occurred through the City's Planned Residential Development (PRD) permit process, which allows developers to achieve consolidated development in exchange for a comprehensive review and protection of natural and agricultural resources. PRD projects may achieve between 3-6.5 units per acre (depending on the underlying zoning designation) and are required to preserve between 20 to 40 percent (depending on the underlying zoning designation) of the gross acreage for agricultural land, recreational open space, and/or natural resources areas. A review of recent PRDs found that these sites achieved an average yield of 75.9 percent. Several of the developments exceeded 80 percent of the potential yield, and the City will implement a policy review and constraint reduction programs to ensure that each of these PRD sites are developed at 80 percent of the maximum density.

Based on this trend and future policies, it is anticipated that future PRD growth will generally match 80 percent of the maximum allowed by zoning.

TABLE 3-83-8: PRD DEVELOPMENTS IN R-E ZONE

| Category | Project | Zoning | General Plan | Maximum Density (du/ac) | Acres (Gross) | Units | Yield % | Status |
|----------------|---------------------------------|---------|--------------|-------------------------|---------------|-------|--------------|--------|
| PRD | TTM 19975 (Diversified Pacific) | PRD R-E | VLDR | 3 | 24.9 | 67 | 89.7% | Built |
| PRD | TTM 16465 (Judson Ranch - West) | PRD R-E | VLDR | 3 | 30.4 | 61 | 66.9% | Built |
| PRD | TTM 16627 (Judson Ranch - East) | PRD R-E | VLDR | 3 | 12.1 | 20 | 55.1% | Built |
| PRD | TTM 18882 (Patterson Ranch) | PRD R-E | VLDR | 3 | 9 | 26 | 96.3% | Built |
| PRD | TTM 15937 (University Grove) | PRD R-E | VLDR | 3 | 61.27 | 164 | 89.2% | Built |
| PRD | TTM 18979 (Diversified Pacific) | PRD R-E | VLDR | 3 | 32.3 | 55 | 56.8% | Built |
| PRD | TM 20079 | PRD R-E | VLDR | 3 | 6.03 | 14 | 77.4% | Built |
| Average | | | | | | | 75.9% | |

3.7 YIELD ASSUMPTIONS

TABLE 3-93-9: YIELD ASSUMPTIONS

| Type | Assumed Yield |
|--------------------------|---------------|
| Residential | 80% |
| Nonresidential/Mixed-Use | 50% |

3.7.1 Residential Zones

Pursuant to the analysis above, an estimated yield factor of 80 percent is assumed on residentially zoned land.

3.7.2 Mixed-Use Zones

The City allows residential development at 30 du/ac throughout its C-3, C-4, and A-P commercial zones (by reference to the R-3 density), as well as its Downtown Specific Plan (Specific Plan 45). Consequently, these zones can meet a substantial portion of the City’s lower-income RHNA.

Much of the City’s RHNA may be accommodated through mixed-use and nonresidential zones around the future Metrolink/Arrow light rail Stations, located near the Esri campus, Tri-City Center, downtown Redlands, and the University of Redlands. These mixed-use zones will allow for full residential development, a combination of residential and commercial, or full commercial development. While most incoming development is anticipated to be residential and mixed uses, it is possible that some sites will be developed for commercial uses, or otherwise below the maximum capacity. To account for this, the City is projecting yields in the mixed-use areas at 50 percent of the maximum allowed by the zoning.

3.8 DENSITIES AND AFFORDABILITY

Pursuant to state law, Redlands must plan for lower-income units on higher-density sites. Redlands is considered a Jurisdiction in a Metropolitan County and has a “default density” of 30 du/ac for lower-income sites. Therefore, all lower-income sites are located in zones that allow at least 30 du/ac.

To identify sites to accommodate the moderate-income capacity, the City used zones with densities between 12 du/ac and 30 du/ac. These zones support lower-intensity multi-family development, such as townhomes and garden apartments.

Above-moderate sites are located in zones that allow fewer than 12 du/ac. These zones typically support single-family developments.

TABLE 3-103-10: DENSITY AND AFFORDABILITY

| Income Category | Density (du/ac) |
|-----------------|-----------------|
| Above-Moderate | 0-11 |
| Moderate | 12-30 |
| Lower | 30+ |

3.9 SIZE

Pursuant to state law, sites that are used to accommodate lower-income housing must be between 0.5 and 10 acres. The City also considered adjacent parcels less than 0.5 acres in size with common ownership as eligible to accommodate lower-income units. While these individual parcels do not meet the size requirements, they collectively function as a single site and add up to over half an acre and would not require consolidation. Since the sites have common ownership, there would be no constraint or required parcel assembly in order to achieve the size of half an acre, which is presumed to be a realistic size for lower-income sites pursuant to state law. Additionally, the City can meet its lower-income RHNA without these sites, but they are included due to their high potential and likelihood of redevelopment during the near future.

Overall, the City has 46 sites smaller than 0.5 acres than can accommodate lower-income units. There are generally three clusters: within the Tri-City Center, in downtown Redlands, and around the University of Redlands. All of the small sites are adjacent to other lower-income sites, and have combined areas of at least half an acre, indicating that they are suitable for lower-income housing development. Additionally, these sites only accommodate 117 total units; and the City has significant excess capacity for lower-income housing elsewhere. However, given the adjacency, common ownership, locations of these sites adjacent to jobs, amenities, and public services, these small sites are ideal locations for lower-income housing development. –The small individual sizes of the parcels will not preclude or prevent any development of lower-income housing production. Finally, the City is included programs 1.1-8 1.1-8 to provide incentives for small site consolidation and development.

3.10 SITES INVENTORY

To meet the RHNA, the City has identified land available for residential development under existing and future zoning. The City will rezone land to provide for up to 4,219 units (RHNA + 20% buffer) within three years from the date of adoption. The proposed inventory includes additional capacity beyond what is necessary to meet the RHNA + 20% buffer. Some of the rezone candidate sites identified in the RHNA may not be rezoned, or rezoned or will be zoned differently than illustrated in the sites inventory based on the results of additional public engagement and environmental review. Regardless of any final decisions on the specific sites to rezone, Redlands will have adequate capacity to meet the RHNA for all income levels after rezoning within three years of Housing Element adoption.

3.11 SITE IDENTIFICATION CRITERIA AND PRIORITIZATION

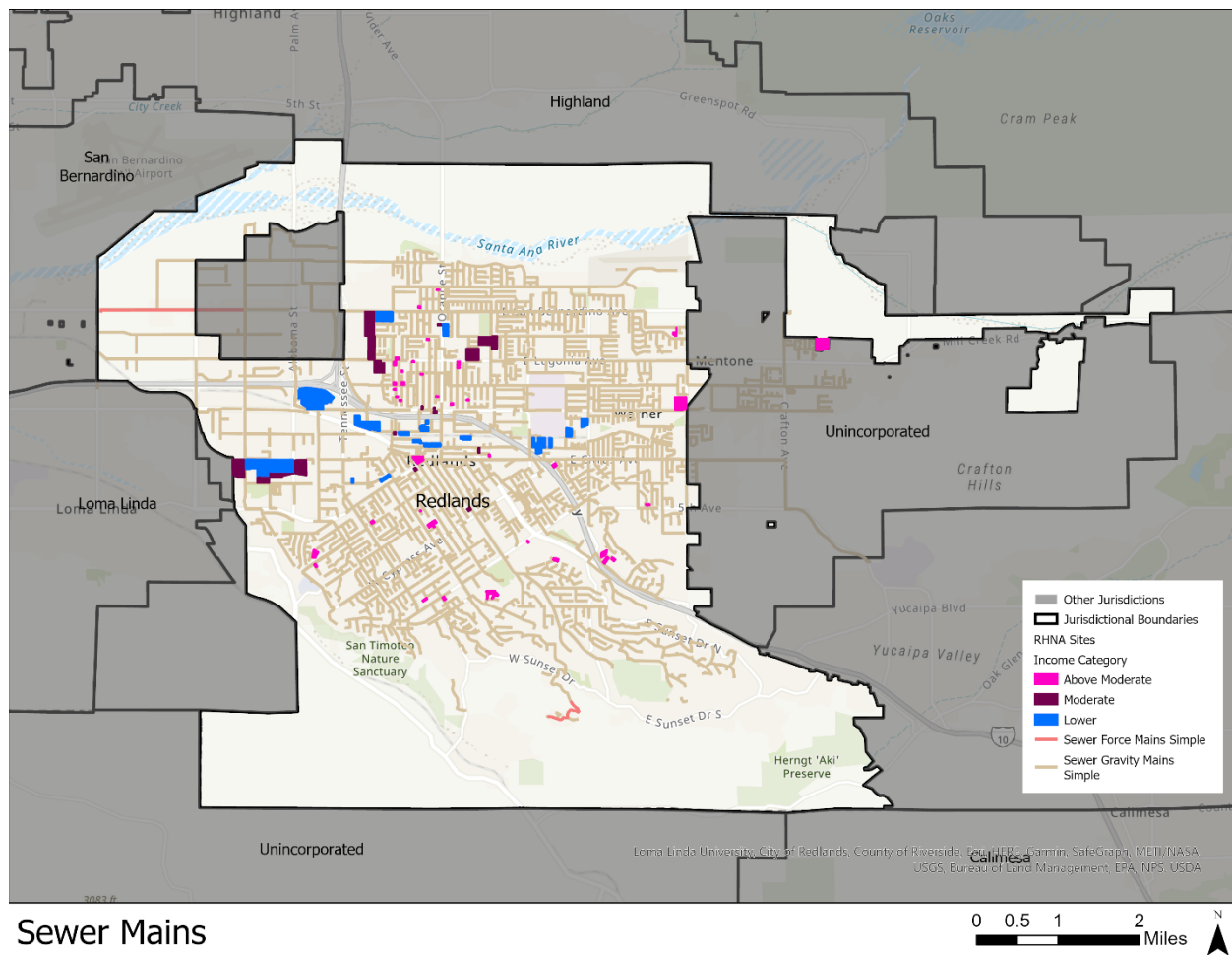
3.11.1 Infrastructure

The City prioritized identifying sites in areas served by existing infrastructure. The sites either already have infrastructure service or are located close to other properties with existing services. Some infrastructure expansion may be necessary to accommodate the large numbers of units in the areas of the East Valley Corridor (west side of Redlands) or Lugonia Avenue (north side of Redlands). In these instances, infrastructure such as water, sewer, and dry utilities lines run along major roadways adjacent to potential sites, and sites are available to support new residential development. Recent projects across the city

have demonstrated that minor infrastructure expansion is not a constraint to development, and the sites included in the inventory are appropriate for residential use. The only expansion necessary would be the extension of laterals to connect to the water and sewer mains, a standard and inexpensive component of nearly all housing construction. Due to the high quality and extensive coverage of the City's infrastructure, infrastructure is not expected to constrain housing development on any of the RHNA sites.

As seen in Figure 3-1, all of the RHNA sites have direct access to sewer infrastructure. The City's water lines generally run parallel to the sewer infrastructure, demonstrating that the sites have adequate access, and any investment needed in extending laterals will be limited.

FIGURE 3-1: RHNA SITES AND SEWER INFRASTRUCTURE



3.11.2 Access to Jobs

The City contains or is adjacent to several job clusters. For example, the Esri campus is located in central Redlands. Esri is one of the City's primary employers and provides well-paying jobs at different incomes. Another employment center is the University of Redlands, which has jobs for academic and support staff. Another employment area is the industrial/warehouse district in northwest Redlands and unincorporated

County pocket. This area is home to a number of distribution facilities, along with more traditional industrial and corporate/office uses. Finally, portions of the western city are close to Loma Linda University Medical Center (in the City of Loma Linda to the west), which are also sources of high-quality jobs. When developing the sites inventory, proximity to these employment centers was considered and contributed to the selection of the identified sites. The sites proposed for high-density housing and rezoning are all within close proximity to one or more of these employment centers, expanding access to opportunity for households at different income levels.

3.11.3 Environmental Constraints

The City has several environmental constraints that make certain areas challenging or less-ideal for new housing development. In particular, High and Very High Fire Hazard zones in the southern hills of the City create conditions that generally preclude these areas from significant new housing. The City's growth is anticipated to take place around the new Metrolink Stations (not in a high/very-high fire zone), so the fire risk will not act as a constraint to achieving the housing on RHNA sites.

The City also has open-space designated areas with sensitive habitat in the southern hills. The City did not plan for any housing on areas with known sensitive habitat, so habitat impacts are not expected to constrain or limit the development of any RHNA sites.

Significant portions of the City's Downtown are within a 100-year flood-zone. The flood zone could impose a constraint in this area, but the City has seen several successful and proposed development in and around Downtown. Residential development is still allowed within the floodplain, provided that the residential spaces are located above the flood-elevation. Achieving this typically involves minor grading and retaining walls to elevate finish floors two feet above the 100-year flood elevation, or by locating parking on the ground floor, as is typical in a popular typology (Type 5 over Type 1 construction). The Downtown area will also be regulated by the TVSP, which will provide flexibility and other incentives for transit-oriented development, even within the floodplain. Moreover, the City has recently received three development proposals within the Downtown Redlands flood plain area containing multi-family housing components totaling approximately 950 units combined. For these reasons, the floodplain is not anticipated to act as a constraint to residential development and that the demand to develop within the floodplain area is strong. And the sites located within the floodplain are both feasible and appropriate for residential development due to proximately to transit, high quality retail, employment, services, cultural amenities, and educational opportunities. Additionally, program 1.2-16 will further remove governmental constraints from developments in the Floodplain, adding to the near-term viability of these sites.

3.12 RHNA SITE CLUSTERS

3.12.1 Transit Villages Specific Plan Area

The TVSP area is proposed to cover approximately 931 total acres in the City's historic downtown, around the Esri campus, and adjacent to the University of Redlands. The TVSP will facilitate smart growth around the City's three planned Metrolink/Arrow light rail Stations by implementing a flexible, form-based code and allowing for high-density residential uses throughout the area. New developments will be able to achieve 30 du/ac in the proposed TVSP's Village Center and Village General districts (which allow up to

three or four stories high), allowing eligible sites to be counted toward the lower-income capacity. The form-based code will create regulations that make it feasible to develop at higher densities such as 30 du/ac, ensuring that the assumed yield percentages are highly conservative and realistic.

The plan is expected to facilitate the recycling of older and less profitable commercial/industrial uses to mixed uses including high-density housing. Despite the entire area allowing for high-density housing, the City is only including properties that are considered “likely to develop” in the sites inventory. The low-income sites in the TVSP area include vacant lots, underutilized commercial properties, older single-family homes, and parking lots. Overall, the TVSP is anticipated to contain capacity for 1,364 housing units in the sites inventory.

3.12.2 East Valley Corridor Specific Plan Area

The City has identified candidate rezone sites in the East Valley Corridor area. Currently designated for commercial, agricultural, and industrial uses, the City will consider rezoning several of these properties to accommodate capacity for lower-income and moderate-income households. Many of the rezone candidate sites are vacant or are being used for agricultural purposes with no permanent structures on-site. A few properties have single-family homes on site, and others are used for industrial storage. The sites identified in East Valley Corridor area are adjacent to multiple schools and parks and have excellent access to regional job centers, including the Esri headquarters and Loma Linda University Medical Center. Additionally, these sites are accessible to the future Metrolink/Arrow light rail stations.

3.12.3 Tri-City Center Development

The Tri-City Center is located at 1380 Industrial Park Avenue and is bounded by I-10 to the north, Tennessee Street to the east, Colton Avenue to the south, and Alabama Street to the west. This 39-tenant shopping center consists of inline spaces and pad buildings with expansive parking areas over approximately 50 acres (over multiple individual properties). The Center, constructed in 1981, has experienced decline over the last two decades. In 2004, the Center was purchased by new ownership and plans were shared with the City in 2006 for a revitalizing program to reinvigorate the Center.³ The economic recession stymied planned progress and the Center has remained underutilized. The development of the Citrus Plaza shopping center just north of the Tri-City Center within the unincorporated area known as the “doughnut hole” has drawn activity away from the Tri-City Center, with some tenants relocating to Citrus Plaza, or closing shop entirely.

There has been recent interest from developers to redevelop the Tri-City Center with a mixed-use residential/commercial concept. Based on the existing utilization of the Center and developer interest, the City has included 500 units from the Tri-City Center in the RHNA. This is substantially less than what would be allowed for the property under the draft TVSP. The Tri-City Center would be able to accommodate these units by redeveloping only a portion of the site; existing operating uses would likely be able to remain while vacant buildings or underutilized surface parking could accommodate new housing development.

³ Redlands Daily Facts. <https://www.redlandsdailyfacts.com/2006/02/07/new-name-new-look-for-tri-city-center/>

Most parcels in the Tri-City Center are between 0.5 and 10 acres, meeting the statutory requirements for lower-income RHNA eligibility. 6 parcels have acreages smaller than 0.5 acres, but these sites all have common ownership, and are adjacent to other properties that ensures the cumulative acreage is greater than 0.5 acres. As these sites have adjacent common ownership, true lot consolidation/acquisition is not necessary for redevelopment, and the smaller sites will not add any constraint or inhibit housing development for households at any income level.

3.12.4 Other Sites

The City has sites suitable for residential development elsewhere in the City. These consist of vacant lots that have existing zoning and infrastructure to support new housing development. Typically, these vacant lots are in single-family neighborhoods and can accommodate some of the above moderate-income RHNA.

3.13 NON-VACANT SITES ANALYSIS

State law presumes that non-vacant sites are subject to constraints based on the existing use, and findings are required to demonstrate the feasibility of non-vacant sites for housing.⁴ This analysis may include a description of the existing use, market conditions, and previous redevelopment experience, as well as any new programs and incentives to promote reuse and redevelopment.

Importantly, if non-vacant sites are used to accommodate more than 50 percent of the lower-income RHNA, in addition to the detailed site-specific review, the City Council must adopt a resolution stating that existing uses on non-vacant sites are likely to be discontinued during the planning period.

Overall, the City can accommodate 1,760 units on vacant sites, including 682 lower-income units. Combined with recently entitled projects (80 units) and ADUs (69 units), the City can accommodate more than 50% (831 of 1,582) ~~of~~ of its entire lower-income RHNA without relying on use of non-vacant sites. The City can fully accommodate its moderate- and above moderate-income units on vacant sites, ADUs, and approved/proposed projects. Therefore, the City is not subject to the required findings pursuant to AB 1397.

Despite the fact that the City can accommodate most of its RHNA on vacant sites, infill on non-vacant sites presents clear opportunities and capacity for additional residential development, particularly around the planned Metrolink/Arrow light rail stations. Overall, the City is anticipating over 1,961 units on non-vacant sites. Of these, 1,779 would be included as lower-income capacity due to the potential under the zoning.

Table 3-[11](#) illustrates the distribution of the 3,721 identified units by the existing use and income.

⁴ Government Code Sections 65583.2(b) and 65583.(g)

TABLE 3-113-11: IDENTIFIED SITES BY EXISTING USE

| Income/Use Typology | Lower | Moderate | Above Moderate | Grand Total |
|-----------------------------------|-------|----------|----------------|-------------|
| Agriculture | 550 | | | 550 |
| Commercial and Services | 549 | | | 549 |
| Multi-Family Residential | 7 | | | 7 |
| Multi-Use Residential Agriculture | | 105 | | 105 |
| Parking Lot | 31 | | | 31 |
| Schools | 28 | | | 28 |
| Single Family Residential | 614 | 77 | | 691 |
| Vacant | 682 | 870 | 208 | 1,760 |
| Grand Total | 2,461 | 1,052 | 208 | 3,721 |

Most of the capacity on non-vacant sites is met through sites with existing single-family residential, commercial and services, and agriculture uses. Collectively, these sites can accommodate approximately 1,790 units of lower-income capacity. Other types, such as parking lots, multi-use residential agriculture, schools, and multi-family residential can accommodate 171 units.

3.13.1 Single Family Residential

There are 16 sites (691 units) with existing single-family residential uses included in the inventory. These properties are all characterized by large lots (generally above 0.5 acres) with most of the property undeveloped. Some of these properties may also contain accessory uses, such as storage or agriculture. While some of the properties appear to be well utilized, a change in the zoning to allow high-density residential will make the existing uses significantly underutilized relative to the zoning potential. [These sites have access to existing water, sewer, and dry utilities.](#)

Lower Income Sites 20,21,22,23,24

Lower Income Sites 20, 21, 22, 23, 24 are currently residential spaces each occupied by a single-family unit. The sites are located in the TVSP on Judson St and Stillman Ave. Each single-family unit takes up about 20% of the total site it occupies, leaving substantial room for increased density and residential development. These residential sites are adjacent to multi-family, single-family, and mobile-home residential uses. Additionally, these sites are close to the University of Redlands and planned Metrolink/Arrow light rail station. The sites are currently designated for High Density Residential in the general plan at 30 du/ac. Three of the parcels are larger than 0.5 acres, indicating that they are suitable for lower-income development. The other two sites (23 and 24) have single ownership and have a cumulative acreage larger than 0.5 acres, also making them suitable for lower-income development. Given the residential location, transit accessibility, and high potential for increased development, these sites are likely to be developed for housing in the near-term.



Lower Income Site 28

Lower Income Site 28 is a group of 5 parcels with common ownership at 337 Cook St in the TVSP that contains a single building but is majority vacant space, rendering it prime for further development. This residential site is directly adjacent to multi-family developments and the University of Redlands, which make it likely to be redeveloped over the sixth cycle. The site is currently designated for High Density Residential in the City's general at 30 du/ac, and ac and will be included in the TVSP. The site is 1.6 acres and has a maximum capacity of 48 lower-income units, but a realistic capacity of 22 units. Given the residential location, transit accessibility, high potential for increased development, this site is likely to be developed for housing in the near-term.

**Lower Income Site 12**

Lower Income Site 12 in the Downtown Redlands contains one single-family residence at 523 Ruiz St, ~~but Ruiz St but~~ is otherwise almost completely vacant. The site consists of 14 parcels (13 vacant) with common ownership, making the site eligible for low-income development. This site is currently zoned for commercial use but will be rezoned for multifamily residential at 30 du/ac as part of the TVSP. This site is adjacent to an existing residential area and another site designated for multifamily residential development in the upcoming cycle, which combined with the underutilization of the land makes it highly likely to be developed. The site is approximately 2.5 acres and has a maximum capacity of 77 lower-income units, with an assumed realistic capacity of 31 units.



Moderate Income Site 21

Moderate Income Site 21 at 11030 Nevada St is majority occupied by a parking lot and industrial storage. The site is adjacent to a school and park, as well as a newer multifamily complex. It is also near an employment hub around the Loma Linda Medical Center. The site is currently single family residential but has more potential for utilization and will be rezoned to medium density. The site is 4.26 acres and has a realistic capacity of 50 moderate-income units. Given the location near employment hubs and underutilization this site is likely to be developed for housing in the near-term.



Moderate Income Site 23



Moderate Income Site 23 at 169 Alabama St is currently occupied for single-family uses and is adjacent to an upcoming multifamily complex currently in construction directly to the south of the site. Most of the property is vacant/unused. The site is currently zoned industrial / commercial in the EVCSP but has significant residential potential and will be rezoned to medium density residential. The site is 2.3 acres and has a realistic capacity of 27 moderate-income units. Given the location near other multifamily developments and underutilization, this site is likely to be developed for housing in the near-term.



Above Moderate Income Site 25

Above Moderate Income Site 25 is at the corner of Wabash Ave and E Colton Ave and is currently completely vacant, rendering it prime for further development. This site is adjacent to a commercial strip and a large single-family residential neighborhood, in addition to a school and a park, making it likely to be developed in the sixth cycle. The site is currently designated for Low Density Residential in the City's general plan. The site is 9.01 acres and has a maximum capacity of 54 above moderate-income units, but a realistic capacity of 43 units. Given the residential location and high potential for development, this site is likely to be developed for housing in the near-term.



3.13.2 Agriculture

Four sites solely used for agricultural purposes are included in the sites inventory. These sites have existing citrus groves, but generally lack significant structures. In recent years, the City has seen many examples of agricultural uses discontinued and converted to residential, largely due to changes in the agricultural economy locally as well as the cost and difficulty associated with maintaining active groves in the area. The agricultural sites in the inventory will be rezoned for high-density residential use, which will incentivize the conversion and development of housing. Additionally, the agricultural sites are located with close access to high-quality employment, schools, and the new Metrolink/ Arrow light rail stations.

Lower Income Sites 41, 42, 44

Sites 41, 42, and 44 are currently used for the Agricultural industry and are some of Redlands' many sites for growing citrus trees. Site 41 is currently residential with a single unit amidst existing agricultural use. Sites 42 and 44 are currently zoned for industrial use in the East Valley Specific Plan, but will be used as mixed-use high density residential at a density of 30 du / ac as a part



of the housing element implementation. Once the properties are rezoned to allow for high density residential uses, they will provide 426 units of realistic lower-income capacity. [Additionally, these sites have access to existing sewer, water, and dry utilities than extend adjacent to the sites on Citrus Avenue and Iowa Street.](#)

3.13.3 Commercial and Services

Nearly all of the sites with existing commercial uses are within the Tri-City Center, which is described in Section 3.12.3, above and below as aggregated Sites 5 and 6. The Tri-City Center has had developers recently express interest in residential development, and could accommodate 500 lower-income units in the inventory.

The other 50 commercial units are located in downtown along Redlands Boulevard on three adjacent parcels. One of the properties is owned by a residential developer who is waiting until the TVSP is adopted to propose a project. The other adjacent properties have a vacant restaurant building and vacant bank building. As there are no businesses currently operating on these properties, the existing uses will not act as constraints on development.

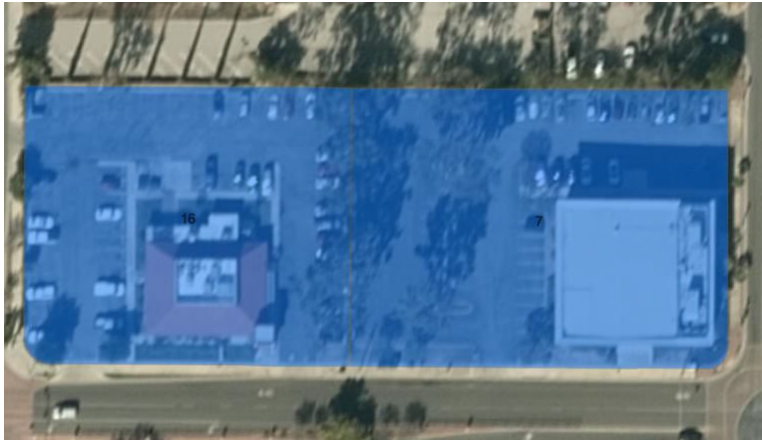
Lower Income Sites 5 and 6 (Tri- City Center)

Sites 5 and 6 are currently commercial spaces home to a shopping mall, an indoor playground, and a car dealership located at the Tri-City Center. This site is primarily occupied by surface parking lots, with less than half of the available land developed. It is central to a commercial area with storage facilities, restaurants, and shops, making this location for housing ideal for

access to community serving amenities. The site is currently zoned commercial in the City's general plan but will be rezoned to allow for mixed use residential at 30 du/ac as a part of the TVSP. The included properties are approximately 33.5 cumulative acres and has a realistic capacity of 500 lower-income units. Given the central location, transit accessibility, and underutilized conditions, as well as stated developer interest, this site is likely to be developed for housing in the near-term.



Lower Income Sites 7 and 16



Sites 7 and 16 are currently vacant commercial spaces that were previously occupied by a restaurant, bank, and real-estate firm. The site is in downtown Redlands, within the TVSP on Redlands Blvd and Orange St. These sites are each over 3/4 surface parking lot which could be converted or fully redeveloped into a high density residential use. It is central to a commercial area with libraries,

restaurants, and shops, making this location for housing ideal for access to community serving amenities. The site itself currently allows residential at 30 du/ac in the City's general plan and will be rezoned to higher intensity multi-family residential as a part of the TVSP. The sites are 1.85 acres combined and have a realistic capacity of 28 lower-income units. Given the central location, transit accessibility, and minimal existing development, this site is likely to be developed for housing in the near-term.



Lower Income Site 15

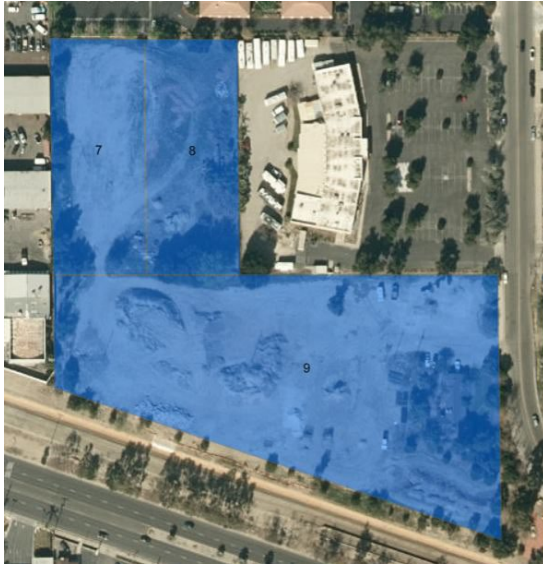


Site 15 currently homes a commercial building at 120 W Redlands Blvd. The existing building takes up the large majority of the parcel with the exception of a small surface parking lot. It is central to a commercial area with restaurants and entertainment, making this location for housing ideal for access to community serving amenities. The site currently allows for residential at 30 du/ac, but will be rezoned to even higher density through the TVSP. The site is 1.47 acres and has

a realistic capacity of 22 lower-income units. Given the central location, existing vacancy, and future transit accessibility, this site is likely to be developed for housing in the near-term.



Lower Income Sites 7, 8, 9



Lower Income sites 7, 8, and 9 in the transit village contain one building on parcel 9 at 619 New York St but are otherwise vacant. This site is currently zoned for commercial use but will be rezoned for multifamily residential through the TVSP. These sites have immediate proximity to both Downtown Redlands and the Esri campus, making them excellent candidates for future infill and transit oriented residential development. Additionally, these sites are directly adjacent to the new Esri Metrolink Station at New York Street. These sites combined are 5.78 acres and have a maximum capacity of 173 lower-income units, with a realistic capacity of 86 units.



Lower Income Site 13

Lower Income Site 13 in the transit village contains one **buildingsbuilding** at 535 W Stuart Ave but is otherwise almost completely vacant. The site consists of 14 separate parcels, each smaller than 0.18 acres. The parcels have common ownership, so complicated lot acquisition or

consolidation processes would not be necessary to construct a project on the site. The site has a cumulative area of 2.07 acres, making it eligible to be included as a lower-income site. This site is currently zoned for commercial use but will be rezoned for multifamily residential at 30 du/ac as through the TVSP. This site is central to a commercial area with grocery stores, restaurants, and religious facilities, making this location for housing ideal for access to community serving amenities. The has a maximum capacity of 62 lower-income units, and a realistic capacity of 31 units. The underutilized nature of the existing use, along with excellent location, makes this site likely for residential development in the near term.



3.13.4 Parking Lots

The inventory contains 5 parcels completely occupied by parking lots, which are expected to have capacity for 31 lower-income units. Of these, two are a part of the Tri-City Center. Another parking lot provided overflow parking for a movie theater, which has currently ceased operations, but may eventually resume use. The third lot consists of two parcels that provide overflow parking for a small commercial development on Ruiz Street. These parcels will all be upzoned with the transit villages, making residential development more attractive and feasible within the near future. Additionally, the lots included act as surplus/overflow, and are not the only parking options for the centers.

Lower Income Site 14

Lower Income Site 14 in the transit village is currently a 1.56 acre gated, unused parking lot. The site is currently zoned for commercial/industrial use but will be rezoned to allow high density multifamily residential through the TVSP. This site is central to the downtown ~~Redlands—commercial~~
Redlands commercial core, with excellent access to



restaurants, medical facilities, and planned transit. Based on the existing vacancy, new capacity through the TVSP, and proximity to community resources, this site is anticipated to be redeveloped during the sixth ~~cycle--cycle.~~



Lower Income Site 11

Lower Income Site 11 consists of four parcels. The two northern parcels are developed with a small, underutilized parking lot, and the southern parcels are vacant. The four lots are contiguous and have common ownership, and collectively add up to 0.61 acres, making them eligible for the lower-income RHNA. The site is located in Downtown Redlands, with excellent access to commercial amenities, employment opportunities, and the Downtown Metrolink/ Arrow light rail stations. The property will be upzoned to allow for transit oriented development and multi-family



residential through the TVSP. The site has a realistic capacity of 9 lower-income ~~units, and~~ units and is likely to be redeveloped during the sixth cycle.

3.13.5 Multi-Use Residential Agriculture

The City has one property considered “Multi-Use Residential Agriculture” which is anticipated to accommodate 105 units of moderate-income housing. The property is currently occupied by an existing citrus grove, single-family unit, and accessory agricultural storage. Based on the limited nature of existing improvements and high potential under proposed zoning, the existing uses are likely to be discontinued in favor of residential redevelopment.

Site 40

Site 40 is an existing Mixed-Use residential and agricultural site at Citrus Ave and Iowa St. which is majority agricultural land with a single-family residence built in 1906. The site is currently zoned for commercial industry but will be rezoned for high density residential for the Housing Element Implementation. Given the proximity to existing residential development and schools, and underutilization of the land, this site is likely to be developed for housing in the near term. The site is not encumbered by an Agricultural Preserve or Williamson



Act Contract. [This site is directly served by existing wet and dry infrastructure services.](#)

3.13.6 School

The sites inventory includes one school. It is an existing preschool, with a single small structure covering less than 10 percent of the site. Half of the property is vacant, and the balance has a lightly used surface parking lot. The property is close to the Esri campus and proposed Metrolink/ Arrow light rail stations and is significantly underutilized. Based on the current conditions on the site and proposed zoning, the property is likely to be redeveloped during the 6th Cycle.

Lower Income Site 49



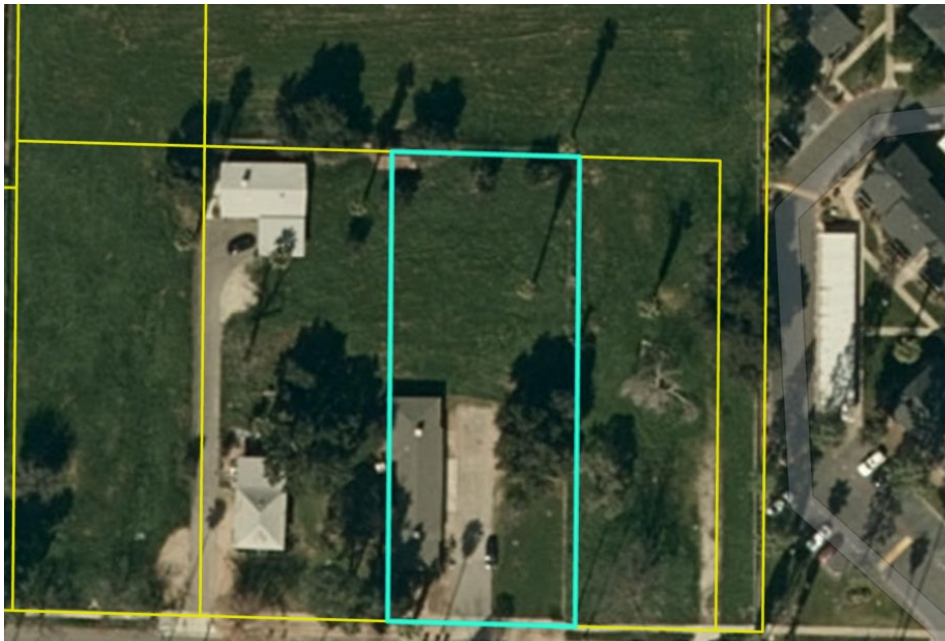
Lower Income Site 49 is currently a pre-school with a large surface parking lot and unused vacant space located at 15 N Center St. The site is currently designated high density residential in the City's and will be included in the TVSP. The site is 1.88 acres and has a maximum capacity of 56 lower-income units, but a realistic capacity of only 28 units, which is highly conservative based on existing utilization and site condition. Given the location and minimal existing development, this site is

likely to be developed for housing in the near-term. [This site is fully served by existing wet and dry infrastructure services.](#)

3.13.7 Multi-Family Residential

Lower Income Site 33

The City generally avoided including any type of multi-family residential in its sites inventory; however, it did include a single duplex with significant residential potential under the TVSP. The property is mostly undeveloped, with two units occupying approximately 20 percent of the site. It is anticipated that the site could accommodate 7 additional units, which could likely be constructed without requiring any demolition of the existing building. Based on these considerations, the property is likely to add units during the 6th Cycle. Additionally, this property is adjacent to other vacant properties under the same ownership, making it a strong candidate for lot consolidation and redevelopment. The property is 0.57 acres, making it eligible to be counted towards the lower-income RHNA. [This site is directly served by existing wet and dry utilities.](#)



3.14 ADEQUATE SITES

The City will have adequate capacity to meet its RHNA after rezoning, as shown in Table 3-12, which summarizes residential development potential for ADUs, pending projects, approved projects, and site capacity. The City has identified capacity for up to 2,610 lower-income units, most of which are included in the sites inventory (not including ADUs, entitled or pending projects). The City can accommodate 1,094 moderate-income units, which are also mostly met on sites in the inventory. The above moderate RHNA can be fully accommodated by recently entitled and pending projects, though the City identified additional eligible vacant sites to provide additional capacity and buffer if necessary.

TABLE 3-123-12: ADEQUATE SITES

| Income/Category | Lower | Moderate | Above | Total |
|----------------------------------|--------------|--------------|------------------|--------------|
| RHNA (+20% Buffer) | 1,898 | 782 | 1,538 | 4,218 |
| Identified Sites | 2,461 | 1,052 | 2,080 | 3,721 |
| ADUs | 69 | 42 | 9 | 120 |
| Recently Entitled Projects | 80 | | 711 | 791 |
| Pending Projects | | | 1,325 | 1,325 |
| Total Identified Capacity | 2,610 | 1,094 | 2,253 | 5,957 |
| Surplus | 712 | 312 | 715 | 1,738 |

3.15 LOWER INCOME SHORTFALL

Under existing zoning, the sites currently accommodating lower-income development have a yield of approximately 155 units, creating a lower-income shortfall of 1,427 units. Sites that will be rezoned to accommodate the lower-income shortfall will be subject to by-right approval for projects with 20 percent or more housing for low and very low income ~~households, and~~ households and will have minimum densities of 20 du/ac and allow a minimum of 16 units per site pursuant to GC 65583.2(h).

To accommodate the shortfall, the City is relying both on mixed-use sites within the TVSP, as well as rezoning outside of the TVSP area. The City will upzone to provide for additional capacity for 1,376 units in the R-3 (residential only) zone. These 1,376 units account for more than 96% of the lower-income shortfall. Because more than 50% of the lower-income shortfall is met through residential (not mixed-use) zoning, the City is not required to establish minimum residential floor areas in the TVSP pursuant to GC 65583.2(h).

A list and map of all sites included in the inventory is included in Appendices A and B.

3.16 FINANCING AND OTHER SUBSIDIES

The City, the County, and HACSB all provide funding and subsidies for the construction, acquisition, and rehabilitation of housing units for lower-income households in Redlands. Many of these programs capture funding from the state and the federal governments and administer the money for local tenants, owners, and developers of affordable housing.

3.16.1 City of Redlands

3.16.1.1 Mobile-home Rent Stabilization

Mobile home parks built prior to October 1, 1981, are subject to rent stabilization, according to City Municipal Code Chapter 5.48. This policy covers three mobile home parks: Sylvan Mobile Estates, Orange Grove Mobile Estates, and Lugonia Fountains. Taken together, 500 housing units are covered.

Other mobile home parks in the City that are not covered by the Rent Stabilization policy are:

- Royal Trailer Park – 1409 W Redlands Blvd.
- Redlands Ranch – 1721 E Colton Ave.

3.16.1.2 Community Development Block Grant Programs

The City of Redlands is a Participating Jurisdiction in the County of San Bernardino's CDBG and HOME Consortium. Program administration is provided by the County's Department of Community Development and Housing with input from the City. The City receives an annual allocation of CDBG funds through the County each year.

CDBG funds are provided by HUD and are meant to be a flexible way of providing communities with the resources to provide suitable housing, improve livability, and enhance economic opportunity, with the provision of affordable housing being one of the program's major goals. Eligible activities include acquisition, rehabilitation, homebuyer assistance, economic development, homeless ~~assistance~~assistance, and public services.

The City has implemented CDBG funding to make neighborhood improvements and fund service providers including:

- Alleyway Improvement Paving in CDBG Target Areas
- Removal of architectural barriers at various public city facilities (ADA Improvements)
- Sylvan Park restroom rehabilitation
- Funding to service providers:
 - Family Service Association of Redlands
 - YMCA of the East Valley

- Inland Temporary Homes
- Boys and Girls Club
- San Bernardino Sexual Assault Services
- Steps 4 Life (Rapid Re-Housing Program)

In fiscal year 2020-2021, HUD allocated \$427,405 in CDBG funds to the City of Redlands.

3.16.2 San Bernardino County

Despite the City's eligibility for direct receipts of HUD money, the City passes much of its federal and state funding to the County for administration and distribution. The County works with the City in directing the use of these funds. For programs that provide assistance to eligible households who apply, such as rental and repair aid, the County relies on the City to advertise and direct local households to these programs.

3.16.2.1 Mortgage Revenue Bond Program

San Bernardino County sells bonds to finance the construction of affordable rental units throughout the County. Proceeds from the sale of the tax-free bonds (and sometimes taxable bonds) are used to provide loans at interest rates below market rate for the construction, acquisition, and/or rehabilitation of multifamily housing developments. A specified number of units are required to remain affordable to eligible, low-income households for a specified number of years after the initial financing is provided.

In recent years, this program has not been used much due to the low interest rates available in the marketplace, removing much of the cost benefit of using tax-exempt bonds. However, an increase in interest rates or in tax rates would likely increase usage of the program. The County of San Bernardino Department of Community Development and Housing (CDH) estimates that market interest rates need to rise above 5.5-6.0 percent for tax-exempt bonds to be attractive. Past usage of the program has resulted in 100 multi-family units supported by the bonds built in Redlands.

3.16.2.2 Emergency Solutions Grant Program

ESG funds are used to provide shelter and related services to the homeless. The County distributes funds to agencies that operate shelters or provide hotel vouchers. Family Services Association of Redlands, which helps people stay in their homes by helping pay utilities, is one of the recipients of ESG grants.

According to the 2018-2019 CAPER, the County received \$1,074,413 in ESG funds in fiscal year 2018-2019.

3.16.2.3 HOME Investment Partnership Program

The County's HOME Grant is administered by the County of San Bernardino Department of Community Development and Housing (CDH).

The County uses HOME funds toward four different programs:

1. *Community Housing Development Organization (CHDO) Program.* CHDOs are funded by the HOME Program, which is obligated to reserve 15 percent of its annual funding to support housing construction, acquisition, or rehabilitation projects by certified CHDOs. Redlands has two active CHDOs: Housing Partners I and Redlands Christian Home.
2. *Rental Property Acquisition and Rehabilitation Assistance Program.* This program provides low-interest loans to developers of rental properties, in order to allow them to acquire or rehabilitate existing housing units and make them available to low-income households.
3. *Tenant Based (Rental) Assistance Program (TBA).* The TBA Program assists qualifying households earning less than 50 percent of the AMI with rent payments on an ongoing basis, and may also provide one-time assistance toward a security deposit.

3.16.2.4 Neighborhood Initiative Program

This HUD-based economic development program consists of grants assigned to specific entities by the Congress.

3.16.2.5 San Bernardino County Rent Relief Program

As a result of the COVID-19 pandemic, San Bernardino County established the San Bernardino County Rent Relief Partnership, an emergency rental assistance program that will leverage more than \$46.8 million in U.S. Treasury funds to provide rental assistance to County residents impacted by the COVID-19 pandemic. Payments from the program are based on 12 months of past due rent balance from March 13, 2020, and households must have an income at or below 50 percent of AMI.

3.16.2.6 Housing Authority of the County of San Bernardino

HACSB administers the Housing Services programs, which include the Housing Choice Voucher and the Five-Year Lease Assistance programs. At present, HACSB owns 120 housing units in the City of Redlands.

Housing Choice Voucher Program

The Housing Choice Voucher program is a rental assistance program that helps very low-income families to live in market-rate housing units rather than public housing. Households are provided with vouchers that are paid to private market-rate landlords, who are then reimbursed by HUD. In addition to the regular voucher program, HACSB administers special housing programs. These programs include the Veterans Affairs Supportive Housing (VASH) Program, Mainstream Program, Housing Opportunity Persons with Aids (HOPWA), and Shelter Plus Care.

- The VASH Program is for homeless veterans with severe psychiatric or substance abuse disorders. HACSB and Veterans Administration Medical Center (VAMC) have partnered to provide rental vouchers and supportive services to eligible veterans. The veteran must demonstrate to the VAMC that he/she is homeless (has been living outdoors, in a shelter, in an automobile, etc.) before being evaluated for this program.

- The Mainstream Program is designed to provide assisted housing to persons with disabilities to enable them to rent suitable and accessible housing in the private rental market. Mainstream applicants are offered a voucher as allocations become available.

Participants must be participating in programs of rehabilitation and/or support services within the community that are directly related to their disability.

- HOPWA was established by HUD to address the specific needs of persons with HIV/AIDS and their families. HACSB has partnered with Foothill AIDS Project to offer rental assistance and supportive services to individuals with HIV/AIDS. Participants are given housing choice vouchers and ongoing assistance with medical and emotional needs.
- The Shelter Plus Care Program was designed to contribute to the countywide public/private partnership system to strengthen services available to homeless families and individuals. Families are referred to HACSB by the Department of Behavioral Health and must comply with supportive service providers. Linking affordable housing to resources and services ranging from job training, health care, day care, and education allows the tenants an opportunity to attain economic and social independence.

Term-Limited Lease Assistance Program

Implemented in 2012, the Term-Limited Lease Assistance Program provides non-elderly/non-disabled households with a five-year term limit on rental assistance – hardship exemptions are available. Designated staff is available to provide coaching and refer families to supportive services and employment opportunities. Families assisted by this program include: new non-senior/non-disabled households pulled from the Tenant-Based Voucher Rental Assistance Program waiting list; port-in households; and certain households that move out of certain Project-Based Voucher housing programs.

Project-Based Voucher Program

The Project-Based Voucher Program provides rental assistance to households living in specific housing sites. Because the rental assistance is tied to the unit, a family who moves (voluntarily or through eviction) no longer qualifies to receive housing assistance. The Housing Authority administers different waiting lists by bedroom size for each project-based housing site. These housing sites are either multi-family or senior housing developments. At this time, there are 553 housing units utilizing the Voucher Program in the City of Redlands.

Steps 4 Life Community Services- Transitional Supportive Housing

Steps 4 Life is a public service project that provides various services to low and moderate income persons, including people who are homeless. The total project budget is \$13,106. The City of Redlands will use \$12,200 for project implementation and \$906 for Activity Delivery Costs incurred by San Bernardino County.

Pilot Homeless Programs

Administered by HACSB, families receiving rental assistance from more than one year can apply. The Housing Authority has the following pilot homeless programs. Homeless individuals and families are referred to these programs through the County's Coordinated Entry System.

- **No Child Left Unsheltered** - Focuses on housing street homeless families with children. Goals are to improve educational and well-being of the children and economic advancement of the parent(s).
- **Golden Apartments** - Permanent supportive housing site for homeless individuals/families. Golden Apartment residents are housed using the Housing First approach which is a model that connects homeless individuals to permanent housing without preconditions to entry.
- **Desert Haven Apartments** - Permanent supportive housing site for homeless individuals/families. Desert Haven Apartment residents are housed using the Housing First approach which is a model that connects homeless individuals to permanent housing without preconditions to entry.

Public Housing Program

The Public Housing Program – also known as the Affordable Housing Program – provides rental assistance to households living in housing units that are owned and managed by the Housing Authority. At this time, the Housing Authority does not provide any public housing in the City of Redlands.

Home Ownership Preparation and Education (HOPE) Program

Administered by HACSB, families receiving rental assistance from more than one year can apply for HOPE, which includes classes and aid toward assisting with home ownership. Subsidies include a voucher to help meet monthly home ownership expenses and a deduction on mortgage loan interest.

3.16.2.7 CALHFA Mortgage Assistance Corporation

The California Housing Finance Agency Mortgage Assistance Corporation (CalHFA MAC) is a nonprofit corporation separate from CalHFA. CalHFA MAC was created specifically to receive and disburse federal funding to qualifying California homeowners as part of the "Keep Your Home California" program.

Keep Your Home California is a federally funded program to help California homeowners struggling to pay their mortgages due to financial hardships. California has received nearly \$2 billion in federal funding and works with housing counselors, servicers and housing advocates to provide assistance that will help prevent avoidable foreclosures. Funding is currently available through 2017. There are four types of assistance under the Keep Your Home California program including: (1) Unemployment Mortgage Assistance, (2) Mortgage Reinstatement Assistance, (3) Principal Reduction, and (4) Transition Assistance.

- **Unemployment Mortgage Assistance Program.** Provides mortgage assistance of up to \$3,000 per month for unemployed homeowners who are collecting or approved to receive unemployment benefits from the State of California's Employment Development Department (EDD).

- Mortgage Reinstatement Assistance Program. Provides funding of up to \$25,000 to help qualified homeowners catch up on their mortgage payments.
- Principal Reduction Program. Provides financial assistance to help pay down the principal balance of a mortgage loan and allow for a more affordable monthly payment.
- Transition Assistance Program. Provides financial help to make a smooth transition into stable and affordable housing.

4 CONSTRAINTS

4.1 GOVERNMENT CONSTRAINTS

The Redlands General Plan and Zoning Ordinance establish locations where housing can be built and identify housing density, lot size, setbacks, and required site improvements. These land use controls can be viewed as constraints in that they determine the amount of land to be developed for housing and establish a limit on the number of units that can be built on a site.

4.1.1 General Plan Policies & Ballot Measures

4.1.1.1 Growth Management and Land Use Elements

The Growth Management Element grew out of the first growth management voter initiative, Proposition R that Redlands voters passed in 1978. The Growth Management Ordinance is located in Title 19 of the Redlands Municipal Code, and was included in direct response to the ballot measures.

4.1.1.2 Annual Development Limitation and Recent Growth

Proposition R was amended by Measure N (a zoning ordinance) in 1987; this policy restricts the development of residential dwelling units to 400 units a year within the city, and the extension of utilities to 150 units per year outside the existing city limits (within the Sphere of Influence, and therefore in the County of San Bernardino's jurisdiction). Of the 400 units within the city, 50 are, by resolution, reserved for single family homes, duplexes, triplexes and four-plexes on existing lots; the remainder are allocated on a point system (adopted as Ordinance No. 2036), which emphasizes design amenities. (This point system is described in the Residential Development Allocation section that follows.) However, as noted in the State Law Preemption section below, these provisions have been rendered null and void while SB 330 is in effect. The City Council adopted Resolution 8082 in 2020 suspending enforcement of the annual building permit limit as long as SB330 is in effect.

Measure U, adopted by the voters in 1997, further articulated growth management policies. This General Plan Amendment reinforced and modified certain provisions of Measure N, adopted Principles of Managed Growth, and reduced the development density of San Timoteo and Live Oak canyons by creating a new land use category: Resource Preservation. This particular aspect of Measure U has a negligible effect on the ability of the City to accommodate future residential development because it concerns an area of

the city with steep hillsides, natural resources, limited utility infrastructure, and other conditions that would limit the development potential of this part of Redlands, regardless of governmental controls.

In addition, under Measure U, no land designated by the General Plan as Urban Reserve as of June 1, 1987, is to be re-designated for a higher density than the R-E designation as the same existed on June 1, 1987 unless specified findings are made by a four-fifths vote of the City Council. The slowing of population growth in the City (Table 2.1-1: Redlands Population Since Incorporation 1888-2020) coincides with the implementation of Measure U. While these occur simultaneously, it is not likely that Measure U was responsible for the slowing growth. Other factors such as the Great Recession and its effect on the housing market and the maturing of the city likely played a more significant role in slowing population growth. Regardless, provisions limiting growth have a negative effect on the provision of housing across income levels.

4.1.1.3 Density and Super Majority

Measure U limits high-density residential land uses to 27 dwelling units per gross acre (du/ac) of development and requires a City Council supermajority (4/5) to approve any proposed developments in excess of 18 du/ac, or with heights in excess of 2.5 stories or 35 feet. Additionally, Measure U specifies required findings that the developments provide “substantial and overriding economic or social benefits to the City.”

The supermajority vote and required findings could potentially create a significant constraint on the development of lower- and moderate-income housing, much of which would fall between 12-30 du/ac (townhomes and garden-style apartments). However, no residential projects have been denied based on inability to achieve a 4/5 vote. Nevertheless, as detailed in Program 1.1-2, the City will be evaluating this along with other provisions of Measure U for consistency with recent changes in State housing law. recent changes to the Housing Accountability Act limit the ability of the City Council to deny or condition projects, including projects that require a 4/5 majority for approval.

4.1.1.4 Level of Service

Measure U also specifies that a level of service (LOS) of C is required for new developments and that in areas already below a LOS C, no new development may be approved that worsens the LOS. Another ~~However, another~~ part of the measure (5.20c) requires that development proposed for an area already below a LOS C is required to improve the LOS to a LOS C.

The requirement that a proposed development in a congested area mitigate all existing traffic could potentially ~~creates~~ a significant barrier for redevelopment in the urbanized core. However, the City has established a process by which residential projects in the core, transit rich areas of the City can apply for an exemption from Measure U, which effectively removes this constraint. This exemption process is discussed in more detail in Section 4.1.1.8 below (Meeting the RHNA Under Measure U).

The City will be evaluating this requirement in Program 1.1-2 which will evaluate all of Measure U provisions for consistency with State housing law.

The policy has the secondary effect of encouraging sprawl type and greenfield development, because infill development in transit priority areas and Downtown becomes nearly impossible as developers need to mitigate existing traffic and LOS challenges, not just those associated with the proposed housing project. Partially in response to the Measure U LOS standard, housing growth in the City has generally occurred on agricultural land further from the City's core, where existing traffic volumes are low and future trips can be more easily mitigated through right of way reconfigurations or roadway expansions.

This ballot measure requirement represents a constraint to development in Redlands, particularly in the City's downtown and transit priority areas.

4.1.1.5 Socioeconomic Cost/Benefit Study

Measure U requires that For nearly any project that requires a discretionary approval, or involves structures larger than 5,000 square feet, a Socioeconomic Cost/Benefit Analysis (SCBS) be prepared for discretionary projects and projects involving structures larger than 5,000 square feet. City staff have an economic model that is used for this analysis. The fee assessed for this analysis is relatively small (\$3,265) and minimal staff time is required to analyze a project using the economic model. No proposed housing project has been denied based on the outcome of the SCBS analysis.

For the above reasons, the SCBS does not pose a significant constraint on new development. Residential development that has been determined to be exempt from Measure U pursuant to the process outlined in Section 4.1.1.8 below are not subject to this requirement. Nevertheless, the City will be evaluating this requirement in Program ??? which will evaluate all of Measure U provisions for consistency with State housing law.is required to be prepared by City staff and funded by the project proponent. This is a costly and time-consuming requirement that creates constraints on the benefits of housing by increasing costs for project proponents and reducing the efficiency of City staff. However, the City has recently approved several housing projects of varying densities and sizes, demonstrating that the SCBS does not prevent development. However, the cost and uncertainty associated with the SCBS requirement create a potential constraint on housing production in the City.

4.1.1.6 Housing Type Balance

Measure U also amended the Redlands General Plan Land Use Element to "plan for" a housing mix of 75 percent single-family and 25 percent multi-family dwelling units at buildout. The City Council has adopted a clarifying resolution of this policy that further adjusts these numbers by determining that "for-sale" condominiums (which are considered multi-family dwellings by the Census and the Department of Finance) will be considered single-family dwellings for purposes of maintaining the Housing Type Balance.

The City Council has requested that staff monitor the housing mix periodically and provide reports to the City Council. Staff evaluated and prepared a report to the City Council based upon data as of June 4, 2019. It was found that as a result of development activity that the 75/25 housing mix ratio was being achieved. The report identified the housing mix to be 74.31 percent single family and 25.69 percent multifamily as of 2019. According to City staff, no new development has been recorded that would significantly affect the housing mix ratio reported in 2019.

However, meeting current RHNA requirements at the densities allocated for low and very-low income housing could cause the Housing Element to come into conflict with the General Plan Land Use Element if the Housing Type Balance shifts to accommodate new housing units accommodated under the 6th Cycle RHNA. While the City is only required to “plan for” a housing mix of 75 percent single-family and 25 percent multi-family dwelling units, this legislative discrepancy can be a potential constraint.

The Growth Management Ordinance, more so than the 75/25 ratio, could limit development. Government Code Section 65589.55 stipulates that low- and moderate-income housing may not be constrained in a way that makes it infeasible (such as through design review or growth management regulations), unless: the project is not necessary to meet the city’s regional housing needs allocation; it would have specific negative impacts on health and safety; it is infeasible due to State or federal law; it is proposed on a site zoned for agriculture, resource preservation, or lacking utility infrastructure; or if it is inconsistent with the zoning and land use designation defined in the Zoning Ordinance and General Plan, respectively. The City could not, therefore, reject an application for a low- or moderate-income housing development on the basis that the City would exceed the planning ratio of 75 percent single family to 25 percent multifamily.

Furthermore, the 75/25 ratio is not meant to be applied to individual development projects, but rather is a broad planning goal the City has as it conducts long-range planning, such as preparing specific plans. It has never been used as a consideration in review of individual applications, nor has it been presented as information in staff reports for development projects consistent with General Plan and zoning designations. Furthermore, the precise ratio will always change and fluctuate slightly as development projects and housing units are built throughout the city. Since Measure U was adopted in 1997, it has never been the basis of denying a multi-family project. Additionally, the ratio is a planning target used to guide the General Plan’s land-uses, but will not prevent the City from effectively planning for its RHNA. Therefore, this Measure U requirement is a potential constraint on housing. City staff will continue to monitor the ratio of single family units to multi-family units. Please see Program 7.1-7 in Chapter 7 for further clarification of the 75:25 ratio.

~~As of 2021, certain provisions of the Growth Management Ordinance are null until 2025 due to the provisions of SB 330. Future legislation may extend this period until 2030 or beyond. At present, the Growth Management provisions do not pose a constraint on housing, but will become a constraint in the future as the provisions of SB 330 sunset. However, the City will still be limited within how it applies the unit cap and the 75/25 ratio, and the 400 unit cap, as it must always be able to meet the RHNA pursuant to state law, and the direct and tangible effects of the measures may be superseded by other portions of the Housing Accountability Act. The City will be evaluating this requirement in Program 1.1-2 which will evaluate all of Measure U provisions for consistency with State housing law.~~

⁵ Report E-5; California Department of Finance.

4.1.1.7 No Environmental Impact

Measure U requires a finding that “the proposed density increase will not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly.” This requirement does not include any qualifier of “significant” and is virtually impossible to meet, literally given that all projects will have some form of impact. This finding also is in conflict with the California Environmental Quality Act (CEQA) and does not acknowledge that significant adverse impacts can be mitigated or allowed subject to findings of overriding consideration. In practice, the City has relied on the environmental documentation prepared under CEQA to make this finding, accepting mitigation measures identified in the project Mitigated Negative Declaration. It is unclear how the City would make the finding when significant and unavoidable impacts are present.

Residential development that has been determined to be exempt from Measure U pursuant to the process outlined in Section 4.1.1.8 below are not subject to this requirement. Nevertheless, the City will be evaluating this requirement in Program 1.1-2 which will evaluate all of Measure U provisions for consistency with State housing law.

4.1.1.8 Meeting the RHNA Under Measure U

The growth management system constrains Redlands’ ability to accommodate its RHNA. During the eight years of the RHNA projection period (2021 to 2029), 3,516 units would need to be accommodated, or about 440 units per year for Redlands to meet its RHNA. This development rate ~~is~~ would not be feasible ~~under this policy, which allows up to~~ with the Measure U limit of 400 units per year within city limits (plus unlimited additional SRO and congregate care facilities). ~~However, the City Council adopted Resolution No. 8082 to suspend the Residential Development Allocation program while SB 330 is in effect;~~ Therefore, during the time that SB 330 is in effect (likely through at least 2030), there is no 400-unit limit or competitive evaluation system. Thus, Resolution No. 8082 eliminates any impact on the City’s ability to meet its RHNA caused by Measure U or the Residential Development Allocation program.

The Redlands City Council took steps to meet the City’s allocation by determining that congregate care and single room occupancy (SRO) units will not count against Measure U’s limitations as long as group dining facilities and a meal program are provided. City staff has defined SRO units as one-room apartments without kitchen facilities although an SRO ordinance has not been adopted by the City at the time of preparation of this Element

Measure U, moreover, ~~does~~ could potentially restrict the City’s ability to meet its housing needs obligations, and restricts multi-family housing development through the requirement of a 4/5 vote of the City Council for densities above 18 du/ac or housing products greater than two and half stories in height. Additionally, the 75 percent single family to 25 percent multi-family ratio identified in the City’s General Plan via Measure U would, in theory, preclude the City from meeting its RHNA. Therefore, during the time that SB 330 is in effect (likely through 2030), the City is not obligated to track/monitor the 75/25 ratio target, so as to eliminate any impact on the City’s ability to meet its RHNA.

Measure U provides for an exemption for development “directly related” to the three rail stations being developed and scheduled to open in Redlands in 2022: the New York Street station near the ESRI campus

which is the City’s largest employer; the downtown station; and the University of Redlands station. If a development project is determined to be exempt from Measure U, then the development is not subject to the aforementioned requirements. This exemption process includes a determination by the City Council that a proposed development is “directly related” to the rail station. In making this determination, the City Council has utilized the following two criteria:

- The project site is located within one-quarter mile of a transit station and a clear pedestrian route is available from the project site to the transit station; and
- The project provides residential units at a density of a minimum of 20 units per acre.

The City Council has recently approved exemptions to Measure U for three residential projects in the downtown that will provide over 950 residential units.

4.1.2 State Law Preemption

4.1.2.1 Housing Crisis Act

The Housing Crisis Act (SB 330/ Government Code Section 66300 et seq. and 65589.5) significantly curtails the authority of local governments to delay, deny, or reduce the density of housing projects that comply with objective standards. Additionally, until 2025/2030, the law supersedes local growth management ordinances that limit the number of units that can be permitted or constructed. From SB 330:

“(E) Notwithstanding subparagraph (D), an affected county or affected city may enforce a limit on the number of approvals or permits or a cap on the number of housing units that can be approved or constructed if the provision of law imposing the limit was approved by voters prior to January 1, 2005, and the affected county or affected City is located in a predominantly agricultural county. For the purposes of this subparagraph, “predominantly agricultural county” means a county that meets both of the following, as determined by the most recent California Farmland Conversion Report produced by the Department of Conservation:

- i. Has more than 550,000 acres of agricultural land.*
- ii. At least one-half of the county area is agricultural land.*

Any development policy, standard, or condition enacted on or after the effective date of this section that does not comply with this section shall be deemed void.”

The above section directly overrides the 400 unit/year limit, as well as the Residential Development Allocation point system used to prioritize the proposed projects until 2025. The Housing Crisis Act also supersedes the single family to multifamily unit ratio, as this in effect creates a cap that will not allow the City to achieve the RHNA allocation.

Additionally, the potential bill SB 8 (2021) could extend SB 330’s provisions until 2030.

4.1.3 Urban Growth Boundary

The City does not have an adopted urban growth boundary, but the growth management policies limit development outside of city boundaries. The City of Redlands is roughly 36 square miles. The City's Sphere of Influence extends east of the city, spanning nearly 45 square miles, but excludes a 1,100-acre "island" of unincorporated county land in the northwestern portion of the City.⁶ (The City provides services to this area in exchange for a 90 percent share of sales tax revenues.) Proposition R, as amended, allows 150 dwelling units per year within the SOI (but outside city boundaries) to apply for annexation. Although the City may only regulate development within its boundaries, the San Bernardino County General Plan policies commit the County to support annexation of land designated for urban development.

4.1.3.1 City Design and Preservation

The City has established a number of design and preservation policies to improve the livability of Redlands. To a large extent this involves design and not necessarily additional cost to the developer. Additional time in designing developments is generally offset by the quality of the end project. Still, it is recognized that additional time for preparing a project and amenities added to a project to meet the design standards may add to the housing costs, and thus serve as a potential constraint.

Under the 1995 General Plan Update, the City has a City Design and Preservation Element. Under the 2017 General Plan Update, that element was removed and the entire General Plan restructured. The policies in the Livable City Chapter of the General Plan (Land Use Element) to describe the City's priorities within specific communities and, as a result, where future residential development is and is not appropriate. While some of these policies are implemented via ordinance, others follow from the General Plan itself. The ~~Land Use Element~~Livable Community chapter includes specific land use designations meant to limit development in environmentally sensitive areas such as in and around San Timoteo Creek. City design policies specifically seek to preserve agricultural land, particularly Redlands' iconic citrus groves, however there are very few protections for privately owned groves/orchards within the City limits. As a result, much of the City's newer development in north Redlands has occurred on former citrus groves. Moreover, the land use designations work synergistically with the City design policies to protect valuable land. For example, in Crafton (within the SOI), citrus groves are protected through the Rural Living General Plan land use designation that permits up to one unit per 2.5 gross acres on slopes under 15 percent and one unit per five gross acres on slopes 15 percent or greater.

~~Many City Design and Preservation~~Some policies within the General Plan policies are intended to protect the unique character of existing neighborhoods. Future development in the San Timoteo/Live Oak canyons area is limited in order to maintain the "backcountry" character of the area while also protecting sensitive habitats and landscapes and having the additional benefit of limiting development in a Very High Fire Hazard area. By prohibiting grading of canyon walls, exceeding 50 percent slopes and protecting "signature ridges," the policies in ~~the City Design and Preservation Element~~the General Plan and the Southeast Area Plan limit opportunities for residential growth. Similarly, a housing conservation overlay district was applied in parts of South Redlands in order to maintain existing scale and character where

⁶ The Island was removed from the City's Sphere of Influence several years ago as a result of Assembly Bill 1544, which was signed into law by Governor Gray Davis in 2000.

homes and neighborhoods have been identified and registered as local areas of historical significance. In addition to older established neighborhoods, historic structures and districts are also protected within the City Design and Preservation ElementGeneral Plan through ordinances that require Historic and Scenic Preservation Commission review and only permit ~~densities,~~ designs, and uses that preserve their character and amenities. While these requirements create potential constraints on the production of housing, they are essential to preserve the City's historic character and high quality of life.

Properties in Historic Districts or having been individually designated as historic must first obtain a Certificate of Appropriateness prior to obtaining a building permit. This process increases the amount of time between application and permit issuance; however it also helps to maintain the iconic character of historic Redlands' neighborhoods. City staff aids applicants and guides them through design and materials selection. The City also administers the Mills Act program to reduce costs for property owners in historic districts.

While review of projects within Historic Districts does require consideration by the Historic and Scenic Preservation Commission, the City has recently demonstrated its commitment to weigh the need for housing over community character. In December 2021, the City Council voted unanimously to approve a small subdivision on a historic citrus grove that is home to a Victorian grove house.

To mitigate the impact of these policy requirements, policies to reduce processing time (Programs 7.4-5 and 7.4-10), and, where possible, increase density of projects (Programs 7.2-10 and 7.9-1) have already been adopted to provide for lower-cost housing and to lessen the potential financial impact caused by design considerations. Furthermore, some of the City Design and Preservation ElementGeneral Plan policies listed below, under "Historic and Scenic Preservation," could potentially aide in the preservation of affordable housing units in the city's historic neighborhoods as several large historic homes have been converted into multi-family apartments.

4.1.4 Zoning Ordinance Requirements

The City has established standards for each of its residential zoning districts. Zoning requirements can serve as a constraint to housing production by limiting or prohibiting various types and styles of development. However, the lot size, unit density, height, lot coverage, setbacks, open spaces, design review, and parking standards are decided upon to ensure a certain quality of life for residents within and adjacent to a development.

4.1.4.1 Residential Zoning Districts

Table specifies development standards for various residential zones. If conflicts with the zoning criteria arise (generally with development applications), the City evaluates standards in different, comparable zones. As a standard or set of standards is found to be inappropriate, it is re-evaluated and amended to reflect current needs (See Program 7.4-6).

The City permits mobile homes in all of its residential zones subject to a plan check and the requirement the mobile home is situated on a permanent foundation. Mobile home parks are permitted subject to the granting of a conditional use permit. As of March 2021, the city contained approximately 764 mobile

homes.⁷ Mobile homes are a reliable source of affordable housing and the City has a rent stabilization policy for mobile home parks.

The City has a second unit ordinance (Chapter 18.156, Article VII (Second Residential Dwelling Units) that is preempted by State law. These secondary units are independent units on existing single-family lots. About thirteen second units per year were built during the last year. To better promote the option of creating second units amongst homeowners, the City will continue its public awareness campaign of promoting ADU development in the City, as well as adopting an ADU Ordinance to guide the development of ADUs within the City. (Program 7.1-6).

TABLE 4-14-1: CITY OF REDLANDS: RESIDENTIAL ZONING CLASSIFICATIONS

| Zoning District | Min Lot Size (sf unless noted) | Dwelling Units per Acre | Max Lot Coverage | Min Width | Min Depth | Max Height | Min Yards (feet) | | |
|---|--------------------------------|-------------------------|------------------|-----------|-----------|------------------------|------------------|------|------|
| | | | | | | | Front | Side | Back |
| Rural Residential (R-R/R-R-A) | 1 acre | 1 | 10 | 125 | 125 | 2.5 stories or 35 feet | 25 | 10 | 25 |
| Residential Estate (R-A/R-A-A) | 20,000 | 2 | 20 | 100 | 120 | | | | |
| Residential Estate (R-E) | 14,000 | 3 | 25 | 100 | 120 | | | | |
| Suburban Residential (R-S) | 10,000 | 4 | 30 | 85 | 100 | | | | |
| Single-Family Residential (R-1) | 7,200 | 6 | 30 | 60 | 100 | | | | |
| Single-Family Residential (R-1- D) | 8,100 | 10 | 35 | 50 | 160 | | 25 | 5 | 25 |
| Multiple-Family Residential (R-2) | 8,000 | 14 | 45 | 80 | 100 | | 25 | 5-10 | 25 |
| Multiple-Family Residential (R-2- 2000) | 12,000 | 17-22 ² | 45 | 100 | 120 | 3 stories ³ | 25 | 5-10 | 25 |
| Multiple-Family Residential (R-3) | 10,000 | 27 ² | 60 | 80 | 120 | 4 stories ³ | 15-25 | 5-10 | 25 |

1. Density calculated from minimum lot size and dwelling units per lot and rounded down to nearest whole number up to what is permitted by the 2035 General Plan.

2. A 4/5 majority of the City Council is required to approve projects with densities above 18 du/ac.

3. A 4/5 majority of the City Council is required to approve projects with proposed height above 2.5 stories or 35 feet.

Source: City of Redlands Municipal Code.

⁷ Based on Redlands' Parcel Data (ExistingUnitsField)

Minimum Lot Size Requirements

As shown in Table 5.1-3, minimum lot sizes for the R-2, R-2-2000, and R-3 multifamily residential districts are 8,000, 12,000, and 10,000 square feet, respectively. While these minimums are quite low and do not typically limit development on smaller lots, minimum lot sizes act as potential constraints on development of small multi-family projects.

Additionally, the Rural Residential and Residential Estate minimum lot sizes of 1 acre and 14,000/20,000 square feet may be a constraint by limiting new housing due to the large lot sizes. While most of the City's housing growth is not anticipated to occur in the more rural areas of the City, the minimum lot sizes in these districts directly limits density and affordability.

Planned Residential Developments (PRDs) provide more flexibility to housing developments approved as subdivisions, allowing for zero lot line development and small lot subdivisions (see Program 7.4-6). PRDs require Conditional Use Permits and for a minimum of 20% (depending on the zone) of the subdivision to be ~~reserved~~preserved as open space. This may be applied to any residential or agricultural district that allows residential development. These requirements could potentially be ~~constraints~~ on new housing; ~~however~~however, as the PRD acts to ensure that open-space is preserved, and also allows for more flexible design and lot configuration. Therefore, the PRD program is not considered a constraint on housing production.

Non-Residential Zoning Districts That Permit Residential Uses

Several other districts permit residential development. Generally, residential uses within non-residential districts will follow the provisions in the adjacent residential district or a district with comparable lot sizes.

- **A-1 Agricultural District:** Single-family residences with no more than two dwellings units per each parcel of five acres or more, or one dwelling for each lot, if less than five acres.
- **A-1-20 Agricultural District:** Single-family residences with no more than two dwelling units per each parcel of 20 acres or more, or one dwelling for each lot, if less than five acres.
- **A-2 Estate Agricultural District:** Single-family dwellings with no more than one dwelling per each lot.
- **MF Medical Facility District:** Residential uses, subject to the requirements and property development standards of the nearest residential zone.
- **T Transitional District:** Residential uses that are permitted in the residential district adjacent to the T district, subject to the requirements and property development standards for the particular residential district.
- **A-P Administrative and Professional Office District:** Residential uses permitted in the R-3 Multiple Family Residential district, subject to the regulations of that district.
- **A-P-C Administrative Professional Commercial District:** Residential uses permitted in the R-3 Multiple Family Residential district, subject to the regulations of the R-3 district.

- **Downtown Specific Plan, TC Town Center District:** Single-family, multi-family, and mixed-use residential uses permitted.
- **Downtown Specific Plan, TC-H Town Center Historic District:** Single-family, multi-family, and mixed-use residential uses permitted.
- **Downtown Specific Plan, SC Service Commercial District:** Single-family, multi-family, and mixed-use residential uses permitted.⁸

The A-P, A-P-C, TC, TC-H, and SC districts, as listed above, allow mixed-use, residential development. In the A-P and A-P-C districts, residential development is allowed subject to the regulations of the R-3 district (see Table 5.1-2). In 2010, City Council adopted Ordinance No. 2739, which increased the density allowed in the R-3 and equivalent districts to 30 units per acre. The R-3 district has a 60 percent maximum lot coverage requirement and allows up to four stories.

Other non-residential districts allow residential uses as a conditional use. Requiring a conditional use permit for residential uses constrains the development of multi-family housing in these districts.

- **C-3 General Commercial District:** Residential uses conditionally permitted as long they are combined with nonresidential uses in an existing or new building and provided that they comply with the regulations of the R-3 Multiple Family Residential district.
- **C-4 Highway Commercial District:** Permits conditional uses allowed in the C-3 district; therefore residential uses are conditionally permitted as long they are combined with nonresidential uses in an existing or new building and provided that they comply with the regulations of the R-3 Multiple Family Residential district.

While zoning designations described above serve to restrict residential development in non-residential zones, the City is actively promoting the Transit Villages Specific Plan that contains opportunities for mixed-use and transit-oriented development. The City has identified housing sites in Downtown, many of which are ideal for very low- and low-income housing development, because of the high densities permitted in this area, however the constraints of Measure U persist with the requirement of a 4/5th vote of the City Council to approve projects above 18 du/ac or above 2.5 stories/35 feet high.

4.1.4.2 Transit Villages Specific Plan Zoning Districts

The City strives to revitalize the downtown as part of citywide economic development objectives. During the 1980s, the Downtown Revitalization Program strengthened the downtown and brought significant private investment. The current Downtown Specific Plan contains three zoning districts: Town Center, Town Center-Historic, and Service-Commercial. All three districts allow single, multi-family, and mixed-use residential projects as a permitted use.

The City has prepared a draft Transit Villages Specific Plan (TVSP) and environmental review is currently underway. The 2035 General Plan introduced the Transit Villages Concept and a substantial portion of the

⁸ The TC, TC-H, and SC are zones within the Transit Villages Specific Plan

Livable Community chapter is devoted to establishing the policy framework to implement the future transit villages within approximately a one-half mile radius of each of the three train stations in Redlands.

Section 4.5 of the General Plan provides that “Transit Villages” have the following characteristics:

- Densities and intensities that promote working and living environments proximate to transit;
- Pedestrian and bicycle access to the station, with safe and comfortable pathways; and
- A transportation system that encourages and facilitates intermodal service and access.”

Section 4.5 of the Livable Community chapter states, “The Transit Village Areas Strategy consists of the following:

- A Transit Village Overlay Zone (TVOZ) of mixed uses, which includes an area of focused streetscape and public realm improvements.
- Base land uses consistent with the land use classifications described in Section 3.1 of the General Plan, designed to foster higher intensities and compact development patterns.
- A Mixed Use Core where a mix of uses and higher densities and intensities would be encouraged through policies and standards in the Transit Village Plan.”

Based on the 2035 General Plan, the draft Transit Villages Specific Plan refines those policies into a detailed set of rules and development standards so that future projects can achieve the community’s vision for compact and walkable transit villages. The TVSP has the intention of accommodating a mix of uses such as residential, retail, commercial, and office types of land uses within an approximately half-mile radius with sufficient density and intensity to support self-sustaining neighborhoods. Density and intensity of uses (in terms of numbers of workers, shoppers, visitors, and residents) are also very important elements, because a sufficient number of people need to be present and utilizing the villages so that they are self-sustaining and financially feasible. The TVSP covers 947 acres, or approximately 4% of the total land area of the City. Approximately 85 percent of land within the TVSP area is developed. In comparison to residential zoning districts (development standards for which are listed in Table 5.1-3), the Transit Villages Specific Plan zoning districts provide form based development standards and allow for dense development, subject to Measure U requirements, and promote a mix of uses. Eight zones would be established under the plan:

1. Village Center (VC) – applies to the parcels immediately surrounding the three stations. Buildings may reach a height of four stories and are mixed-use, all residential, or all office. Parking is located behind buildings or subterranean.
2. Downtown (DT) – applies to parcels facing State Street east of Orange Street and along the east side of Orange Street between the railroad right of way and State Street. New buildings up to three stories in height accommodate a mix of uses with commercial ground floors and residential or commercial upper floors. Parking is located behind buildings, subterranean, or in park-once lots or structures.

3. Village General (VG) – applies to parcels located around the periphery of the three stations. This zone enables multi-family and mixed-use buildings with an average height of three stories. Parking is located behind buildings or subterranean.
4. Village Corridor (COR) – applies to parcels along the north side of Colton Avenue, both sides of Orange Street north of the I-10 freeway, and both sides of Olive Avenue. This zone enables small-scale mixed-use buildings up to two stories in height with commercial ground floors and residential or commercial upper floors. Parking is located behind and to the sides of buildings, subject to minimum street-facing building frontage requirements.
5. Neighborhood General 1 (NG1) – applies to parcels located between Sixth Street and Church Street. It enables small-scale commercial and house-form buildings up to 2 stories high that accommodate commercial, light industrial, and live-work uses. Parking is allowed behind and to the side of buildings, subject to minimum street-facing building frontage requirements.
6. Neighborhood General 2 (NG2) – This zone enables house-form buildings that accommodate residential and office uses. New buildings are up to two stories in height and are set back from the sidewalk behind yards. Parking is located behind new buildings.
7. Special District (SD1) – applies to school and other institutional sites. New buildings accommodate educational, religious, and other civic uses. Parking is located in surface parking lots or garages.
8. Civic Space (CS) – applies to parks, plazas, greens, and other open spaces within the Specific Plan area. These open spaces accommodate small structures such as gazebos, restrooms, and community centers.

As for parking requirements, minimum off-street parking spaces are provided in the TVSP and, for residential uses, are based on unit size, and gross floor area for commercial uses. Generally, the parking requirements in the TVSP are slightly lower than the parking requirements provided in the Municipal Code due to the transit-oriented character and convenient pedestrian access within the transit villages.

4.1.4.3 Affordable Housing

The Housing Resources section identifies different zones and suitable sites that may accommodate affordable housing need. The City ~~is considering~~intends for the Transit Villages Specific Plan to facilitate smart growth and new residential development around the new Metrolink/Arrow light rail stations. The plan contains progressive mixed-use development standards that will increase the sites available for affordable housing. Additionally, the City is including programs to upzone the RHNA sites outside of the TVSP area to further improve capacity for affordable housing. The City also has examples of two recent affordable housing projects that occurred in medium-density multi-family areas. These recent projects support that land zoned for less than 30 du/ac can also support affordable housing.

4.1.4.4 Multi-Family Development

Pursuant to the zoning ordinance (Section 18.192.020), all multi-family developments containing 35 or more dwelling units are subject to a conditional use permit (CUP). The findings of approval for a CUP are as follows:

- That the proposed development will not adversely affect the applicable land use plans of the City;
- That the proposed development will not be detrimental to the public health, safety and welfare;
- That the proposed development will comply to the maximum extent feasible with the regulations of the City's General Plan, the applicable zoning district and the City's development standards; and
- That the proposed development is appropriate at the proposed location.

These requirements were adopted because of the potential for neighborhood conflicts due to traffic, noise, and aesthetic concerns. A public hearing, which is a requirement of the CUP, gives neighborhoods the opportunity to participate, voice their concerns, and ensure that the projects are as compatible as possible with existing development. ~~The threshold of 35 units is City policy but could be adjusted upward by the City Council by an ordinance text amendment if there was a demonstrated need.~~ Conditional Use Permits are a potential constraint by adding uncertainty and extending the potential for delay in project processing, ~~however the recent evidence of multi-family approvals show that the constraint does not prevent development throughout the City. Furthermore, m~~Multi-family development within the Transit Villages Specific Plan are permitted uses (unless greater than 35 units), and processed through a Commission Review, ~~and~~ Approval is required of all new construction over 500 square feet and the 4/5th City Council vote may apply for density and height approval. There is currently no difference in the permitting process for multi-family rental developments from other, for-sale, multi-family developments in the City.

[Program 1.2-13 is included to remove the CUP requirement for multi-family developments greater than 35 units.](#)

4.1.4.5 Density Bonus Provisions

The State Density Bonus Law provides a maximum density bonus of fifty percent (50%). To be eligible for the maximum bonus, a project must set aside at least fifteen percent (15%) of total units for very low income households, twenty-four percent (24%) of total units for low income households, or forty-four percent (44%) of for-sale units for moderate income households. Levels of bonus density between thirty-five percent (35%) and fifty percent (50%) are granted on a sliding scale, depending on the number of affordable units.

4.1.4.6 Housing Type Variety

The City's zoning ordinance allows for a variety of housing types. Moreover, "dwelling unit" definitions do not distinguish between constructed and factory-built housing. As per State law, the City does not regulate

the number of individuals living in a dwelling unit that is state licensed if that number is six or fewer, nor does the City distinguish between permanent and transitional housing. Therefore, supportive and transitional housing are treated the same as other residential uses in the same zone.

In October 2013, City Council adopted Resolution No. 7322, which allowed for emergency shelter and transitional housing to be constructed in the SC (Service Commercial) district of the Downtown Specific Plan by right. The SC district is 38.1 acres and the most recent point in time count of unsheltered homeless individuals in the City is 47. The SC District could easily support homeless shelters that would meet the City's need. Many properties in the district are highly underutilized, with existing uses consisting of surface parking lots and small or aging structures. Additionally, the district contains 20 vacant parcels, with a total area of 2.9 acres. As the SC district is a part of the Downtown Specific Plan, it has excellent access to employment, commercial and recreational amenities, and educational institutions. This district is also located within 2 blocks of the Downtown Metrolink Station. These conditions make the SC district appropriate for emergency shelters.

The Downtown Specific Plan contains a number of specific standards that apply to emergency shelters. The plan specifies requirements for on-site security, parking, storage, pets, on-site management, operational hours, among others. There are no spacing requirements or development standards for emergency shelters that would pose a constraint to development. Program 1.2-1 amends the code for AB 139 compliance. The City has identified Program 7.2-1 to amend the Downtown Specific Plan/proposed TVSP to comply with the requirements of AB 139 – Emergency and Transitional Housing. The City will reduce the parking requirements, and review all other emergency shelter standards to ensure that they are expressly permitted by AB 139 or are consistent with other uses in the same zone.

Redlands has six single-family and three multi-family residential districts (Table 5.1-2). Furthermore, the 3,723 total available sites are located in a range of zoning districts. The development standards for these districts generally do not serve to restrict the development of single-family residential structures. The requirements for lot size and private open space are a constraint to small lot multi-family development. Housing is allowed in 10 different non-residential districts (see page 5-7). While only single-family homes are allowed in the agricultural districts and the R-1, R-E, and R-S districts, the minimum lot area, height, and front, side and rear yard standards are not burdensome. The Administrative & Professional Office (A-P) and Downtown Specific Plan/ proposed TVSP districts permit single-family and multi-family housing of various types including mixed-use, live/work, emergency shelters, and group homes.

A discussion of development fees is found on page 5-20. The fees the City charges do not serve to restrict housing variety.

4.1.4.7 Hillside Slope Standards

The southeastern portion of Redlands contain steep hillsides and canyons. The City initially restricted growth in these areas through Measure N, in order to protect ridgelines from significant grading and preserve scenic vistas. These restrictions have the additional purpose of minimizing flood hazards, erosion from residential and road construction, exposure to wildfire, evacuation efficiency, and potential for groundwater deterioration. The Zoning Ordinance defines a Hillside Development District (HD) for parcels with average cross-slopes greater than 15 percent. In this district, densities are limited to 1 unit per every

2.5 acres in areas with 15 to 30 percent slopes, and 1 unit per every five to ten acres in areas with 30 to 40 percent slopes, respectively. Since the majority of this area is zoned as single-family residential and agriculture uses, the permitted density of the General Plan land use designation of Very Low Density Residential would permit up to 6 du/ac, thus the hillside policy results in fewer dwelling units per acre than would otherwise be permitted by the General Plan. While a constraint in terms of achievable dwelling units, the hillside policy is both practical and necessary to protect valuable environmental resources, limit exposure to hazards, and is generally in line with smart growth practices.

4.1.4.8 Parking Standards

Off-street parking facilities are required for all new dwelling units. Single-family residential dwellings are required to have at least two covered parking spaces per unit. Multi-family residential dwellings require a range depending on the housing type and number of bedrooms. Outside of the proposed TVSP, one-bedroom units are required to provide one parking space, two bedroom units are required to provide one and a half parking spaces, and units that are three bedrooms or more are required to provide two parking spaces. Additionally, all multi-family projects containing more than two units on a lot must provide one uncovered off street parking space for every two units. The parking requirements for multi-family development can serve as a constraint on development by requiring more land area to accommodate surface parking. Ordinance No. 2688 provides reduced off-street parking requirements for mixed-use projects. The TVSP proposes more streamlined and less burdensome parking requirements that are not viewed as a constraint to development and are suitable for transit oriented development.

While parking standards can constrain residential development, requirements of the State density bonus law allow for reductions in parking requirements in multi-family housing developments, often where housing affordable to very low- and low-income households is located. Tandem parking (where two cars are parked, one in front of the other) and uncovered parking satisfies the parking requirement for second units, another good source of affordable housing.

4.1.4.9 Building Codes

Redlands currently requires residential construction to comply with the 2019 California Uniform Building Code and other standard codes. The City has not amended the building code in a way that would increase the costs of developing housing or increase the time for permitting. Fire sprinkler systems are also a requirement on all new residential units or when an addition of 500 sf or more is constructed (such as an ADU, JADU), which adds a cost between \$0.81 and \$2.47 (\$1.35⁹ on average) per square foot, depending on the unit type.

The City has two full-time Code Enforcement Officers to conduct a pro-active code enforcement program, but also responds to complaints or notices received through the City's Redlands 311 reporting app. The City also has a Rental Dwelling Unit Ordinance that was adopted in 2012 and is implemented by the Code Enforcement Division of the Facilities and Community Services Department. The ordinance requires that every rental property obtain a rental dwelling unit permit. The permit must be renewed on an annual

⁹ Home Fire Sprinkler Cost Assessment – 2013, <https://www.nfpa.org/News-and-Research/Data-research-and-tools/Suppression/Home-Fire-Sprinkler-Cost-Assessment-Final-Report>

basis and the owners are required to keep the rental dwelling unit(s) in compliance with specific standards, particularly those regarding life safety, hazards, and maintenance. The intent of the ordinance is to ensure that the City's rental housing stock is kept and maintained according to state and local health & safety laws. The cost of this permit ranges from \$80 to \$116 depending on the rental property typology. This fee may pose a financial constraint to property owners of rental housing.

4.1.4.10 Off-site Improvements

Offsite improvements, including public streets, curbing, sidewalks, streetlights, water, sewer, and drainage requirements, have an impact on the cost of residential development.

Section 17.17.020 of the Municipal Code describes a set of required improvements in addition to those stipulated under the tentative map, including upgrades to infrastructure, utility hookups and site design.

1. **Frontage Improvements:** Street structural sections, curbs, sidewalks, driveway approaches and transitions.
2. **Storm Drainage:** Storm drain system improvements to collect and convey on-site storm water run-off; system should not adversely affect abutting and off-site properties.
3. **Sanitary Sewers:** Each unit or lot must be served by an approved sanitary sewer system.
4. **Water Supply:** Each unit or lot must be served by an approved domestic water system.
5. **Utilities:** Each unit or lot must be served by gas, electric, telephone and cablevision facilities.
6. **Underground Utilities:** All existing and proposed utilities within the subdivision and along peripheral streets must be placed underground except those facilities exempted by the Public Utilities Commission regulations or if impractical due to physical constraints.
7. **Fencing:** Each parcel or lot within the subdivision that is adjacent to a public facility must have an approved fence or wall adequate to prevent unauthorized access between properties.
8. **Other Improvements:** The City Engineer, in accordance with this Code, the General Plan and City standards and specifications may require other improvements, such as grading, streetlights, fire hydrants, signs, street lines and markings, street trees and shrubs, landscaping, monuments, bicycle facilities, fences and smoke detectors, or in lieu fees.

These offsite improvements are either installed by the developer as part of the project or paid for by impact fees assessed on larger regional or area wide facilities. Offsite improvements are assessed to determine appropriateness of improvements based on need. While these are not unique requirements, they do increase the cost of development. To mitigate the constraint that offsite improvements can place on housing, adjustments and modifications to standard requirements have been granted for PRDs, hillside developments, and rural projects. Furthermore, the vast majority of sites included in the inventory are already adjacent to dedicated streets and have necessary sewer and water infrastructure.

4.1.5 Development Review Process

4.1.5.1 Permit Processing

Residential construction involving individual single-family homes on existing lot, mobile homes, and two-to four-unit multi-family projects are approved at a staff level (ministerial review). Projects are evaluated relative to zoning and building code standards and receive approvals within two to four weeks of application. The City's plan check policy is to complete first submittal plan checks within 10 business days and resubmittal checks within 5 business days.

The City offers a "Preliminary Review" service where plans may be submitted for review and comment by all relevant City departments prior to formal application. However, the City staffs a "One Stop Permit Center" where customers can talk with representatives from Planning, Building, and Municipal Utilities and Engineering to receive guidance and obtain standards for development.

Residential construction involving tracts and larger multi-family projects utilize the following processing schedule.¹⁰

For projects not requiring legislative actions the entitlement process can take as little as -100 calendar days (approximately) if an Initial Study is not required under the California Environmental Quality Act.¹¹ Steps are:

- (1) submission of complete application,
- (2) Development Review (40 days),
- (3) Planning Commission (30 days).

During this formal application phase, the applicant submits ten sets of plans, appropriate application forms and all required fees. Completeness review by Planning staff and committee review by the Development Review Committee occurs within the first 30 days following application submittal. The applicant then provides additional information and prepares plan revisions (if needed) based on Development Review Committee comments/corrections. Conditions of approval are prepared and any final issues are addressed before the project moves on to public hearing. For the public hearing phase, proposed projects must be included on an agenda in advance. Staff prepares and presents reports on each project. The applicant and members of the public have the opportunity to comment. As for multi-family development, the zoning ordinance allows up to 34 units to be approved under a site plan approval process called a Commission Review and Approval (CRA). The site plan proceeds through the same process except that CRAs do not require a public notice or hearing (if a SCBS is required for the project, then RMC §16.02.040 requires a public hearing for the SECBS), but do proceed to Planning Commission Review.

10 In the case of a developer who wishes to build in an already approved subdivision, often a Planned Residential Development (a conditional use permit) application is processed concurrently with other permits. If the subdivision meets all of the development standards of the zone, there is no further review other than the Residential Development Allocation (RDA) process. All subdivisions of five or more units are required to go through the RDA process unless the subdivision in question is a lot sale subdivision.

11 Projects requiring CEQA review may take an additional 180 days or more to allow for preparation of the environmental document.

If the project is subject CEQA, then an Initial Study must be prepared by the city's environmental consultant(s) and typically requires an additional 90 to 180 days including a 30-day public comment period on the environmental document (e.g., a Mitigated Negative Declaration). Consideration of the project environmental document is part of a public hearing on the entire project. This threshold is a matter of City policy, and could be adjusted upward, although it has not been a factor in inhibiting affordable housing in the past.

For projects requiring legislative actions (General Plan Amendment, Zone Change, Agricultural Preserve Removal, etc.) processing takes approximately 140 calendar days, plus any CEQA environmental review processing requirements. Steps are the same as above plus (4) City Council (40 days).

- Once the entitlements are granted developers prepare for approval of their final map and submit for Residential Development Allocations (RDA)¹². With the RDA process (described below) there is another step that residential developers go through that is not required in neighboring cities. The RDA process takes approximately 60 calendar days, however, it typically is occurring when the developer is completing final engineering and completing the final map (as well as finalized home designs), so the timing is not significantly different than in other communities.
- A residential project with five or more units must receive an RDA before it may be granted a building permit. Once an application is filed, it is processed and reviewed and allocations are determined by the City Council.
- Note: With implementation of SB 330 provisions through at least January 1, 2025 (and adoption of City Council Resolution No. 8082 suspending the RDA's competitive evaluation and selection system contained in RMC 19.04.040 for the duration of SB 330), the evaluation and approval of multifamily residential dwelling units now occurs simultaneous with the individual project's CRA and/or CUP entitlement process.

The development review process is not different for residential projects included as part of a mixed-use project.

Given that permit processing times are generally in line with other communities in the area, the Redlands development review process does not represent a constraint that is significant, although additional staff resources would enable staff to process projects more quickly. Regulations to include additional environmental assessment, requirements of SB 18, and water quality requirements (all federal, State and regional requirements), etc. have added to the processing time and cost of development in all cities, not just in Redlands. These additional requirements are not generally reflected in the timelines above because this information and requirements are required at time of application submittal and determination of completeness.

Developers can face delays in obtaining building permits after entitlement due to the need to create more detailed plan sets after entitlement approval. Those plans may take several weeks to develop and submit for plan check review; however, the City accepts plan checks "at-risk" and many developers take

¹² The RDA process has been temporarily suspended by SB 330 until 2025. (City Council Resolution No. 8082 adopted on 5/19/2020 suspended the competitive evaluation and selection system contained in RMC 19.04.040). The proposed SB 8 may extend this to 2030.

advantage of this option to expedite the permitting process. This process allows the developer to submit their project for plan check review prior to entitlement approval. The plan check is “at-risk” as the project may be modified prior to entitlement, but the ability to initiate the plan check process early can result in developers obtaining building permits at the conclusion of the entitlement appeals period.

4.1.5.2 Postings and Notices

The City is compliant with requirements for posting notices of public hearings and discretionary land use decisions. This includes Conditional Use Permits, Variances, Zone Changes, General Plan Amendments, and Environmental Review among others. The City has an internal process to track projects and submit notices in the appropriate format to the local newspaper, posting on the City’s website, and posting in physical locations on the City’s buildings including outside the Council Chambers and at the City Clerk’s office.

4.1.5.3 SB 35 Ministerial Approval Procedure

Senate Bill 35 (Wiener, 2017) requires a Streamlined Ministerial Approval Process for developments in jurisdictions that have not made sufficient progress towards their RHNA.

The City of Redlands has yet to receive an SB 35 application. If the City were to receive an SB 35 application, it would follow state law procedure. The City would provide a layout summary and other materials upfront, as well as an optional precomputation to review standards and objective standards. The following permitting procedure that the City will follow is from the Streamlined Ministerial Approval Process guidelines outlined by HCD.¹³

1. After receiving a notice of intent to submit an application for a Streamlined Ministerial Approval Process, and prior to accepting an application for a Streamlined Ministerial Approval process, the City will complete the tribal consultation process outlined in Government Code section 65913.4(b).
2. The City will perform a determination of consistency with regards to objective zoning, subdivision, and design review standards.
3. The City will perform a determination of consistency with density requirements.

The City will complete the design review within the following timeline:

1. Within 60 calendar days of submittal of the application to the City if the development contains 150 or fewer housing units.
2. Within 90 calendar days of submittal of the application to the City if the development contains more than 150 housing units

The City will determine whether the applicant for Streamlined Ministerial Approval complies with requirements, and will approve or deny the application, within the following timeline:

¹³ HCD Updated Streamlined Ministerial Approval Process: <https://www.hcd.ca.gov/policy-research/docs/sb-35-guidelines-update-final.pdf>

1. Within 90 calendar days of submittal of the application to the City if the development contains 150 or fewer housing units
2. Within 180 calendar days of submittal of the application to the City if the development contains more than 150 housing units.

While the City has yet to receive an SB 35 application, the City will facilitate the process and support any future applicants, as outlined in Program 1.2-19.

4.1.5.24.1.5.4 Residential Development Allocation (RDA)

The Residential Development Allocation (RDA) process discussed below has been temporarily invalidated by SB 330 until 2025, and potentially until 2030 based on SB 8. Also, the City Council adopted Resolution No. 8082 on May 19, 2020, suspending the competitive evaluation and selection system contained in RMC 19.04.040 for the duration of the State's applicable legislation.

Required by voter initiatives, the Residential Development Allocation (RDA) determines which projects may move through the development process to receive building permits. Projects (involving more than four units) compete against each other for an allocation of housing units from the pool of 400 dwelling units allowed each year within the city limits and 150 utility connections permitted in the SOI. The City Council makes allocations four times each year, 117 dwelling unit allocations in each of the first three quarters and then the remainder of dwelling units in the fourth quarter. Staff assists applicants in preparing applications. Unused dwelling unit allocations cannot be carried forward into the next year. Moreover, a project must obtain at least ninety points in order to be eligible to receive an allocation award.

Admittedly, it is a procedure that adds time to the total development approval process by requiring that homebuilders first receive an allocation before proceeding with building permits. Once entitlements are granted, the RDA process takes approximately 60 calendar days. However, this typically occurs when the developer is completing final engineering, completing the final map, finalizing the home designs (after selecting a home builder), and processing building permits. Therefore the projects are not held in hiatus when they are going through the RDA process and there typically is no significant time loss. Furthermore, the RDA application fee is \$2,828 per development application.

The City's RDA system is not anticipated to create significant barriers to the approval of affordable housing developments. In fact, the City currently encourages the construction of affordable and senior housing units by awarding up to 20 points for providing such housing. (This is ten points more than the original points system permitted.) Specifically, two points per unit are awarded for projects with 15 percent of dwelling units restricted for very low- and low-income residents and up to six points are given to projects with 90 percent or more of the dwelling units restricted for seniors. While low-income or senior housing developments may not qualify for the maximum points in all rating categories, the City believes that most such projects will score high enough in most of the rating categories to be more than competitive with market-rate housing proposals. The City can address the cost implications of location and design factors included in the evaluation system through other regulatory incentives (such as density bonuses with reductions in certain development standards) and stabilized fees via Development Agreements with affordable housing developers. In addition, a substantial percentage of affordable housing is anticipated

to be provided in mixed- income projects in which the majority of dwelling units are market-rate. Such projects will have a greater capacity to absorb marginal increases in costs from the application of the City's RDA system.

4.1.5.34.1.5.5 *Socio-economic Study and Cost Benefit Analysis*

This requirement was added with the passage of Measure U in 1997. The Growth Management Element of the General Plan states that any development project proposal requiring a General Plan Amendment, Zoning Amendment, Subdivision Map, Specific Plan, Conditional Use Permit approval, or with a building or development area exceeding a cumulative total of 5,000 square feet shall submit a socio-economic study and cost-benefit analysis. However, it was decided that it was not the intent of the Growth Management Element to evaluate a single-family residence on an existing lot of record that is over 5,000 square feet in area.¹⁴ This requirement is not discriminatory as it applies to all development projects—residential and nonresidential, single-family as well as multi-family units.

Projects must submit additional information, including absorption schedule or rate, proposed assessed value, and proposed public improvements. The review is conducted by City staff using a standard checklist and a spreadsheet-based model, and the cost is \$3,265 per project (regardless of project size or number of housing units). The average single-family project is about 50 units, and the average multi-family project is 90 units, so this would come out to \$65 and \$36 per unit, respectively. Thus, the monetary cost of this requirement is quite low. City staff prepares the study and analysis that is reviewed by the Planning Commission/City Council along with the Initial Study (per CEQA).

The Study requires the evaluation of how the development project in question will affect:

- **Agricultural/Citrus Removal:** will the project affect agricultural resources or operations (e.g. impacts to soils or farmlands, or impacts from incompatible land uses)? Will the project remove active citrus groves—a hallmark of the city—from production?
- **Wildlife Habitat:** will the project eliminate or have a negative impact on wildlife corridors? Will it tend to urbanize open space, impacting preservation and conservation of natural resources? Will it interfere with the use of recognized trails used by joggers, hikers, equestrians or bicyclists? Will it eliminate, reduce, or have any negative impact on wildlife habitat areas including fringe or buffer areas?
- **Traffic:** will the project result in increased vehicle trips or congestion? Will it create additional traffic so as to be in conflict with the policies of the General Plan? Will it impact the livability of a residential neighborhood on streets which, due to design or terrain features, street side development, or other factors, have greater than usual sensitivity to increased traffic? Will it create additional traffic so as to increase the level of service on roadways that are adjacent to or in the vicinity of the project?

¹⁴ Reference from 5th Cycle Housing Element Update, Email exchange with Jeff Shaw, City of Redlands Community Development Director, 3/12/2008.

- **Fire and Paramedic Services:** will the project require fire and paramedic services that are beyond the current capabilities of the Fire Department? Will it result in an increase in response time for essential fire or paramedic services to the remainder of the community? Will it result in the need for additional fire or paramedic facilities or equipment?
- **Police Services:** will the project require police services that are beyond the current capabilities of the Police Department? Will it result in an increase in response time for essential police services to the remainder of the community? Will it create a need for additional police facilities or equipment? Will it increase crime as a result of the type of business?
- **Downtown Impacts:** will the project result in a reduction of the number or types of businesses located in the downtown? Will it cause an unfair or unreasonable competitive disadvantage to existing businesses downtown? Will it create vacant buildings and the potential for blight? Will it cause an unreasonable increase in traffic downtown? Will it adversely affect downtown businesses?
- **Residential Design:** will the project conflict with existing codes and/or standards? Will it meet minimum point standards of the Residential Development Allocation process?
- **Cultural Facilities:** will the project impact a historic residential structure, neighborhood, or district? Will it impact a historic commercial structure or district? Will it impact cultural facilities such as the Smiley Library, Redlands Bowl, Lincoln Shrine, Joslyn Center, Community Center, etc.? Will it have the potential to cause a physical change that would affect unique ethnic cultural values? Will it have the potential to disturb, impact or restrict religious or sacred facilities or uses?
- **Park and Recreational Facilities:** will the project result in the increase use or demand for park facilities or programs (including manpower, facilities and equipment)? Will it result in a ratio of parkland to population that exceeds standards and/or goals established by the General Plan?
- **Land Use Compatibility:** will the project result in land uses that are incompatible or inconsistent with the General Plan? Will it create economic impacts on businesses and small property owners? Will it physically separate or divide an existing community? Will it create job losses in the community? Will it create overcrowding of housing?
- **Schools:** will the project create an overcapacity in schools? Will it create the need for additional school facilities or equipment? Will it result in land uses that are inconsistent or incompatible with existing educational facilities in the community? Will it result in social or academic impacts on students because of school closures?

The findings listed above are rated as having a potentially significant, potentially significant unless mitigation incorporated, less than significant, or no impact. RMC Chapter 16.02 provides the SCBS requirements, and RMC 16.02.040 states, "The approving body for the development proposal shall conduct at least one public hearing at which the public may appear and be heard to consider the socioeconomic cost/benefit study after providing ten (10) days' prior notice, published once in a newspaper of general circulation within the city." In some cases that may not otherwise require a public

hearing (such as a simple CRA approval), this provision may trigger a public noticing and hearing requirement for the entire project.

In a basic sense, the requirement for the Study tasks Planning staff with performing a quick checklist to verify that, for instance, the parcel(s) in question are not in the habitat area of a protected species or that the developer is prepared to pay impact fees related to police, fire, and schools. In other words, the bulk of the findings simply require that Staff check that the project in question adheres to policies in the General Plan and/or Zoning Ordinance—information that otherwise would normally be provided in a staff report; this process standardizes this review to enable those who are interested in the project to view, at a glance, how well the project in question complies with the General Plan and City codes.

Studies are done concurrently with the processing of projects (residential or otherwise), and therefore do not have any impact on a residential project proceeding or the length of processing time (for a lower income multi-family or other type of residential development). Additionally, residential developments generally have a positive socio-economic impact because a sales tax factor is included. Therefore, while there is a direct relationship between the cost of the residential unit and the tax benefit provided, this requirement does not serve to constrain development. Since 1997, hundreds of socio-economic studies have been performed and no project has been denied because of a study's results. Please see Program 7.4-14 in Chapter 7 for further clarification regarding how the Study is used.

4.1.5.44.1.5.6 *Impact Fees and Exactions*

Fees are collected by the Building Division, Municipal Utilities and Engineering Department through the One-Stop Permit Center, and by the Redlands Unified School District at their offices by appointment. Fees are updated every several years, as needed. Planning application fees and Municipal Utilities and Engineering fees were last updated in August 2018; both are available online on the City's website. Current School District fees, last updated in June 2012, are also available online on the District's website. To obtain Building & Safety Division fees, applicants must call the department or visit the One Stop Permit Center, since fees depend on specific project types. Because current fees are assessed per unit and very low- and low-income units are not exempt, the fees constitute a significant share of the cost of producing housing at market minimum prices. This effect is amplified by Redlands' allocation system, which awards up to 72 points for design and energy efficiency considerations. Developers who want to increase their chances of winning an allocation will include more amenities; these then drive up the cost of their product. This is somewhat offset by provisions that allow 20 points to be awarded for very low- and low-income and senior citizen housing.

Total fees for a single-family home, assuming a 2,200 square foot home on a 7,200-square-foot lot, in a 6 du/acre tract, add up to approximately \$16,641. Total fees for a multi-family home are about \$11,638. Total fees for an ADU can range between \$5,224 and \$6,856.

While these fees may seem high, Redlands is a "full-service" city and therefore charges impact fees to include water, sewer, landfill, public facilities, etc. Conversely, in other cities, certain fees are not paid to the City but rather to a water company, waste disposal company, or other entity that provides a service. Table 5.1-6 shows the fee breakdown. All developers will not be charged all of the fees shown. For example, amending the General Plan or changing the zoning designation of a particular property may not

be necessary for many projects. Additionally, Table contains planning/processing fees, building and safety fees, and development impact fees, all of which serve distinct and necessary purposes. Furthermore, while fees are generally applied equally within the city, usually the infrastructure costs of extending water lines, sewer lines, streets, etc. are greater for developments on the outskirts versus infill projects. For example, if an infill site that was once retail is being converted into apartments, because the City gives credits for trips previously attributed to the site, the apartment complex developer would have greatly reduced transportation fees. Developers can also receive credits for certain fees if improvements such as roadways, traffic signals, drainage systems are installed as part of the project.

TABLE 4-24-2: REDLANDS DEVELOPMENT FEES (PER UNIT)

| | ADU 700+ sq feet | ADU < 700 sq feet | Single Family | Multi- Family | TOD |
|--|---------------------|----------------------|---|--------------------|--------------------|
| Development Impact Fees | | | | | |
| Open Space and Parks | \$2,454.85 | \$1,841.14 | \$3,959.94 | \$3,624.62 | \$2,454.85 |
| Library | \$164.02 | \$123.01 | \$264.58 | \$242.18 | \$164.02 |
| Storm Drain | | | \$700.00 | \$343.00 | \$343.00 |
| Public Facilities Fee | \$425.55 | \$319.16 | \$686.45 | \$628.33 | \$425.55 |
| Fire Protection Fee | \$357.74 | \$268.31 | \$577.08 | \$528.21 | \$357.74 |
| Police Facilities Fee | \$18.67 | \$14.00 | \$30.11 | \$27.56 | \$18.66 |
| Transportation Fee | \$937.54 | \$703.16 | \$1,512.36 | \$1,048.32 | \$1,074.63 |
| Sewer Capital Fee | \$824.65 | \$618.49 | \$3,130.00 | \$2,295.00 | \$366.00 |
| Water Capital Fee | \$1,146.08 | \$859.56 | \$4350.00 - \$9431.00 (depending on acreage) | \$2,181.00 | \$1,096.00 |
| Solid Waste Fee | \$325.00 | \$325.00 | \$650.00 | \$325.00 | |
| Water Rights | \$206.29 | \$154.72 | \$783.00 - \$1701.00 (depending on acreage) | \$397.00 | \$167.00 |
| DIF Total | \$6,860.39 | \$5,226.55 | \$16,643.52 - \$22,642.52 | \$11,640.22 | \$6,467.45 |
| Building and Safety Fees | | | | | |
| Building Permit | \$736 | | | | |
| Building Plan Check | \$4,093 | | | | |
| Plumbing | \$63.85 | | | | |
| DIF + Building and Safety Total | \$11,753.24 | \$5,226.55 | \$21,536.37 - \$27,535.37 | \$11,640.22 | \$6,467.45 |
| Environmental Review (Negative Declaration) | \$392.00 | | | | |
| General Plan Amendment | \$3,797.00 | | | | |
| Zone Change | \$1,066.00 | | | | |
| New Construction Conditional Use Permit | \$1,066.00 | | | | |
| Commission Review and Approval | \$12,493.00 | | | | |
| Tentative Tract Map Review | \$2,567.00 | | | | |
| Final Tract Map Review | \$3,857.00 | | | | |
| Residential Development Allocation | \$392.00 | | | | |
| Total (with GPA and Zone Change) | \$11,753.24 | \$5,226.55 | \$47,166.37 - \$53,165.37 | \$37,270.22 | \$32,097.45 |

Source: City of Redlands Resolution No 7951, 2018. .

Accessory Dwelling Unit Development Impact Fee Memorandum, 2018

In calculating the fees in Table , several assumptions were made. It was assumed that single- family homes are on average 2,200 square feet at a density of 6 dwelling units per acre. Similarly, the following assumptions were made for multi-family housing scenarios: townhouses are 1,200 square feet at 10 units/acre, multi- family units of 1,000 square feet are at 20 units/acre, and multi-family units of 800 square feet are at 30 units/acre. The average project size for these developments was assumed to be 50 dwelling units for single-family homes, 60 dwelling units for townhouses, 75 dwelling units for multi-family units at 20 units/acre, and 90 dwelling units at 30 units/acre. For sewer and water frontage fees, it was assumed that frontage for a single-family home or a townhouse is 50 feet and frontage for a multi- family home is 30 feet. Sewer frontage fees are \$30/foot across the board, and water frontage fees are \$30/foot for 8-inch pipes and an average of \$46/foot for twelve-inch pipes.

The City recognizes that development fees, although necessary to pay for facilities and services required by new development, add significantly to the cost of housing and affect the feasibility of constructing affordable housing. For this reason, to mitigate this constraint, the City has used, and will continue to use, grant funds to pay for development fees if necessary, to maintain the financial feasibility of an affordable housing development proposal.

4.1.6 Constraints to Housing for Special Needs Groups

Single-family homes, which comprise three-quarters of the housing stock in Redlands, are often too expensive for low-income persons and others with special needs. Therefore, it is necessary for the City to establish policies and processes that facilitate other housing types. This section addresses policy constraints and opportunities that affect special needs groups, including seniors, people with disabilities, the homeless, large families, female-headed households and low-income individuals and families.

As described in the zoning section earlier in this chapter, the City has several stipulations within its policies to encourage alternative housing types.

4.1.6.1 Emergency Shelters, Transitional Housing, and Supportive Housing

In January 2008, Senate Bill 2 (SB 2) went into effect, requiring that every jurisdiction in the State identify one or more zoning districts that allow emergency shelters and that transitional housing and supportive housing be treated as any other residential use, subject only to those restrictions on residential uses contained in the same type of structure. The law also requires that the identified zones contain sufficient capacity to provide shelter for homeless persons that have unmet housing needs. On October 1, 2013, City Council adopted Resolution No. 7322, which permits emergency shelters in the SC (Service Commercial) District of the Downtown Specific Plan by right and establishes development standards for emergency shelters. The City has 38.1 acres of land in the SC district and a current [unsheltered](#) homeless population of 141. The 38.1 acres is more than sufficient to fulfill the need for emergency shelters for the City's unsheltered homeless population. The City continues to permit transitional and supportive housing by right in all zones that allow residential uses, and projects are not subject to any restrictions not imposed on similar residential uses in the same zone. [\(see Program 1.2-3Program 7.1-3 to ensure the City is compliant with supportive housing regulations pursuant to Government Code section 65651.\)](#)

4.1.6.2 Single-Room Occupancy (SRO) Units

SROs represent another affordable housing alternative. City policies regulate the location of single-room occupancy (SRO) units (they are only permitted in the R-2 Multiple Family Residential District with a conditional use permit). However, programs in this Housing Element seek to clarify the definition (Program 7.1-1) and create standards for SROs (Program 7.1-2). In general, the City views SROs as single-room apartments without full kitchen facilities (although often they have a microwave in each room and/or shared kitchen facilities). Furthermore, SROs are exempted from the city's annual 400 dwelling unit cap imposed by Measure U, and therefore may be used to fulfill regional housing needs over this limit. The City initiated the process of considering appropriate zoning districts for SROs and developing criteria for the review of projects. Staff held one workshop with the Planning Commission and had begun preparing a draft ordinance for their review. Staffing constraints have since stymied progress on the SRO Ordinance and the City will be maintaining this program in this current policy cycle.

4.1.6.3 Manufactured Housing and Mobile Homes

Municipal Code Chapter 18.140 regulates the location of manufactured housing and mobile homes. Manufactured homes and mobile homes are considered single-family homes and therefore are permitted in all residential zones, as long as they comply with the density and other requirements within that zone. Mobile home parks, developments designed and constructed as a single land use complex, are subject to conditional use permits. The City believes that mobile homes are an important source of affordable housing and therefore mandates rent control in several of the larger complexes (Lugonia Fountains Mobile Home Park, Orange Grove Mobile Estates, and Sylvan Mobile Estates). The City's rent control policy is detailed in Municipal Code Chapter 5.48, Rent Stabilization for Mobile Home Parks and ties rent increases to the Consumer Price Index (CPI).

4.1.6.4 Constraints to Housing for Large Households and Female-Headed Households

Large households and female-headed households may require more traditional housing types; the SROs, mobile homes and shelters described above are not well suited for families. In 2011, approximately 7 percent of households in Redlands were female-headed households and 11 percent were large households (defined as five or more persons per household). These populations are described in more detail in Chapter 2.

Multi-family housing, a more affordable housing option, is permitted in the R-2, R-2-2000, and R-3 Multiple Family Residential as well as Administrative Professional, Town Center, Town Center- Historic, and Service Commercial districts and some non-residential zones adjacent to these districts. Multi-family housing is also permitted in the C-3 and C-4 commercial districts, but is constrained by the requirement for a conditional use permit. Although the zoning code does not restrict the number of bedrooms per unit, the market often does.

Furthermore, of the total existing housing stock in Redlands, over half is made up of three and four-bedroom units. Additionally, overcrowding does not appear to be a substantial problem in Redlands; according to the 2019 American Community Survey, 5.1 percent of households were considered overcrowded (defined as more than one occupant per room). Program 7.3-8 has been added to study

overcrowding conditions in Redlands in more detail, as well as the inventory and availability of large (3+ bedroom) units, and make further recommendations to the City Council based on the findings.

4.1.6.5 Constraints to Housing for Persons with Disabilities

As noted in the Special Needs section (3.2) of the Housing Element, persons with disabilities have a number of housing needs related to accessibility of dwelling units; access to transportation, employment, and commercial services; and alternative living arrangements that include on-site or nearby supportive living services.

The City ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal (Americans with Disabilities Act) requirements for accessibility. The City also permits educational, residential, health care, and other supportive services (defined as institutional services in the zoning code) of the type that could benefit persons with disabilities in residential zones. Sites zoned for multi-family use, administrative professional, and C-3 and C-4 Commercial zones, which all permit mixed-use developments, are located along arterial streets and transportation corridors to facilitate access and accessibility for persons with disabilities.

Seniors-only housing currently exists in Redlands and provides many of the features that meet the needs of persons with disabilities. The City's current development standards permitting mixed-use developments will allow a wide variety of housing types that could meet the needs of, and provide accessibility to services and transportation to, individuals with disabilities.

Group Homes – 6 or fewer people

The State of California has removed City discretion for review of small group home projects (six or fewer residents). The City does not impose additional zoning, building code, or permitting procedures other than those allowed by state law. There are no City-initiated constraints on housing for persons with disabilities.

The City's municipal code permits group homes of 6 or few people in any residential zone, however the code implies that group homes must be licensed by the State. To prevent unnecessary constraints on group homes and to improve housing choice within the community, the City has included program 1.2-51.2-5 that would clarify that a group home of 6 or fewer people may be permitted in any residential zone regardless of State licensing.

Group Homes – 7 or more people

The City's municipal code identifies group homes of 7 or more people as being permitted in multi-family and agricultural zones with the approval of a Conditional Use Permit. This is inconsistent with other similar uses and present a constraint to providing group homes that serve people with disabilities or who otherwise require assistance which subsequently leads to reduced housing choice. With a Conditional Use Permit, the certainty of approval is limited. Conditional Use Permits require a public hearing and notices mailed to all property owners within 300-feet of the proposed group home. In some cases, the potential exists for neighborhood organization against the application and NIMBY-like behavior. The City has included Program 1.2-51.2-5 to address these constraints on Group Homes and will amend the municipal code to permit Group Homes in all residential zones.

In light of current planning policies and zoning regulations, the City believes that it has mitigated any potential constraints to the availability of housing for persons with disabilities.

Procedures for Ensuring Reasonable Accommodations

The City of Redlands has established procedures to ensure that reasonable accommodations are made for persons with disabilities. Any person with a disability may submit an application for reasonable accommodation or variance from the requirements of City zoning or building codes by submitting an application to the city's Development Services Director who may deny, approve or conditionally approve the request or pass the request along to a designated city committee (Ord. 2656 § 1, 2007). The City provides assistance to applicants who need help completing the application. A notice of the filing of the application is sent to owners of all properties within three hundred feet of the property that is the subject of the application. The notice contains information about the nature of the accommodation request and provides instructions for notification of any decisions that are made or hearings scheduled regarding the application. The Development Services Director or the committee acting in the capacity of the Director makes the following findings:

- The person who will use the subject property is protected under the fair housing laws;
- The requested exception to the zoning code, law, regulation, procedure or policy is necessary to make specific housing available to persons occupying the subject property;
- The requested accommodation will not impose an undue financial or administrative burden on the City; and
- The requested accommodation will not require a fundamental alteration of the city's zoning or building laws, policies and/or procedures.

In practice, the requirement to notify property owners within 300-feet does not slow down requests. There is no cost to submit an application for reasonable accommodations; the only cost is a building permit (for a small addition to a home, a permit costs less than 500 dollars). The Zoning Ordinance establishes a timeframe of 30 days to make a decision on an application and the notification of neighbors within 300 feet is handled within this timeframe.

Typically, smaller-scale ADA retrofit requests are processed over the counter. A request for a ramp to accommodate a wheelchair takes approximately two to three weeks, while a bathroom modification only takes two to three days. Building permit fees for these types of procedures are less than 100 dollars for bathroom modifications and approximately 30 dollars for a wheelchair ramp.

Efforts to Remove Regulatory Constraints for Persons with Disabilities

~~The State of California has removed City discretion for review of small group home projects (six or fewer residents). The City does not impose additional zoning, building code, or permitting procedures other than those allowed by state law. There are no City-initiated constraints on housing for persons with disabilities.~~

The City allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with ADA requirements. Such retrofitting is permitted under Chapter 11 of the 1998 version of the California Code. The City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint. The City's Zoning Code has been reviewed for Chapter 11 compliance and was found to be compliant.

Information Regarding Accommodation for Zoning, Permit Processing, and Building Codes

The City implements and enforces the Americans with Disabilities Act (ADA) and applicable California law regarding access and accommodations for persons with disabilities. The City provides information to applicants or those inquiring of City regulations regarding accommodations in zoning, permit processes, and application of building codes for persons with disabilities.

Zoning and Other Land Use Regulations

A comprehensive review of the City's zoning laws, policies, and practices for compliance with fair housing law has been conducted and is included in the Affirmatively Fair Housing Chapter of the Housing Element. The City has not identified any zoning or other land use regulatory practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals. Examples of the City of Redlands General Plan: Housing Element ways in which the City facilitates housing for persons with disabilities through its regulatory and permitting processes are:

- The City has no authority to approve or deny State-licensed group homes of six or fewer people in zones allowing residential uses, except for compliance with building code requirements, which are governed by the State of California. Similar homes serving seven or more persons are only permitted in the Multiple-Family Residential and Agricultural zones, subject to a conditional use permit. However, Program 7.1-1 in Chapter 5 calls for a thorough evaluation of where such homes are most appropriate. For example, because individuals living in group homes often rely on transit to access social services, it may make more sense to allow group homes in Downtown or in other high density or mixed-use areas.
- The City permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of such uses in any part of the City. The Land Use Element of the General Plan does not restrict the siting of special needs housing.

Permits and Processing

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City's requirements for building permits and inspections are the same as for other residential projects and are fairly simple and straightforward. City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

A significant number of group homes operate in the City of Redlands. As discussed above, the City allows group homes of six or fewer persons by right, as required by state law. No conditional use permit or other special permitting requirements apply to such homes.

The City does not impose special occupancy permit requirements for the establishment or retrofitting of structures for residential use by persons with disabilities. If structural improvements are required for a group home, a building permit is required. If a new structure were proposed for a group home use for more than six persons, design review would be required as for any other new residential use with five or more units. The hearing process is the same for group homes and special needs housing for persons with disabilities as for other residential projects of five or more units. The Planning Commission examines permitted uses, architecture, landscaping, and site design. To the City's knowledge, its design review process has not been used to deny or substantially modify a housing project for persons with disabilities or otherwise. Furthermore, no reductions in density have been required because of design review.

The City's zoning and permit processes also allow for on-site supportive services, with no additional special conditions. The City's permit process allows conversion of residential structures to include these supportive services as accessory to the primary residential use.

Building Codes

The City provides reasonable accommodation for persons with disabilities in the enforcement of building codes and issuance of building permits through its flexible approaches to retrofitting or converting existing buildings and construction of new buildings that meet the shelter needs of persons with disabilities. The City of Redlands has adopted and implements the 2007 California Uniform Building Code and is working on adopting the 2012 version. Should the State of California adopt the 2000 International Building Code, Redlands will implement the provisions of that code. Until that time, the 2007 UBC will be the applicable code the City is required to enforce under state law.

4.1.7 Development Densities below those Anticipated in the RHNA

As seen in the 5th Cycle, sites identified in the RHNA were either not developed with residential uses or were developed at lower densities. For the 6th Cycle RHNA, the City is implementing a 20% buffer when planning for residential capacity. This 20% additional capacity addresses the possibility that some sites may not develop as anticipated. Should that occur, the City would still be well within its ability to accommodate its RHNA obligation before needing to identify and rezone additional land. Additionally, the City has weighted its 20% toward the Very Low and Low Income categories as this unit classification is generally the most difficult to see to fruition.

In November 2021, the City Council made findings to exempt three different projects in the downtown from Measure U requirements. Each of these sites are included in the City's RHNA for the 6th Cycle. The total proposed unit count from these projects is 950 units indicating interest in developing higher density housing is gaining traction.

4.1.8 2022 Ballot Measure Amending the Principles of Managed Development of the General Plan

On June 7, 2021, Redlanders for Responsible Growth Management, filed with the Redlands City Clerk a petition for an initiative measure titled "An Initiative Ordinance of the People of Redlands Amending the Principles of Managed Development of the Redlands General Plan ("Initiative"). The initiative is an effort to ensure that future development within the City occurs in a manner that is consistent with the values

and standards enacted by the people of Redlands through the establishment of the City's Growth Management System. More specifically, the Initiative would amend various sections of the previously adopted Measure U as follows:

1. Requirements for a Socio-economic analysis and cost benefit study will be modified to include a formula that is applicable to residential components of a project in order to determine costs necessary for inclusion in the cost benefit study;
2. Exempt those properties located within the Transit Village Overlay Zone from vote requirements related to density increases and will establish new height limits and parking requirements for Transit Village areas;
3. Provides certain categories of development from the Principles of Managed Development previously established by Measure U and exemptions for development related to the Metrolink stations and for new developments within the Downtown Specific Plan 45 will be deleted;
4. The City Council's vote requirement related to re-designating or rezoning lands previously designated as Urban Reserve or Urban Reserve (Agriculture) will be amended from a requirement of a 4/5th vote to a 5/5th vote. Measure U's density limitation on lands designated as Urban Reserve would also be deleted.
5. Establishes exemptions for projects which have acquired vested rights in accordance with criteria established by the initiative from the Initiative's requirements. The Initiative further details that actions taken by a developer to expedite a development project due to the pending Initiative will not qualify for exemption from the provisions of the Initiative.
6. Require that any interpretation of the Initiative's provisions shall be done in a manner which most vigorously and effectively accomplishes its purpose and operative provisions.

Preemption by Senate Bill 330 (SB 330) – Housing Crisis Act

The courts use the following four-step test when determining the issue of preemption:

1. Does ordinance/initiative regulate a 'municipal affair'
 - a. The regulation of zoning through an initiative directed at changing the City's General Plan is considered a municipal affair
2. Must be an actual conflict between local and state law
 - a. The Initiative conflicts with the Act by its imposition of height restrictions, new parking regulations, and the imposition of third-party approvals of certain development proposals by adjacent landowners.
3. The State law must address a matter of 'statewide concern'
 - a. The legislature has specifically deemed the provision of adequate housing a matter of statewide concern
4. Must be determined that the initiative is 'reasonably related to...resolution' of the statewide concern and is 'narrowly tailored' to avoid unnecessary interference in local governance
 - a. SB 330 is narrowly tailored to the type of land use restrictions which reduce or restrict the development of housing

Based on this four-step test, the Initiative is highly likely to be preempted by SB 330 because it imposes new land use restrictions beyond what was found in the City's General Plan 2035, and those restrictions would have the effect of reducing the development of affordable housing opportunities.

Conflict with SB 330 - Housing Crisis Act and Legal Review Conclusions

Based on analysis considering the sufficiency of the proposed Initiative, the following components of the Initiative may be prohibited by the Housing Crisis Act:

1. Established height restrictions in the Transit Villages
2. Requirement for written agreement from adjacent single-family dwelling owners for buildings with more than two stories
3. Additional parking requirements
4. Revised vote requirement to 5/5th vote for the re-designation or rezoning of land designated as Urban Reserve or Urban Reserve (Agriculture).

Any development policy, standard, or condition that does not comply with the Housing Crisis Act is considered to be void. Therefore, the above mentioned provisions, would likely be deemed void if challenged and if the Initiative passes as they have been determined to lessen the intensity of housing. Furthermore, the proposed revisions to parking standards under the Initiative would also conflict with the State's Density Bonus Law's parking requirements as the Density Bonus Law's parking requirement is 1.5 spaces for units with two bedrooms or more and the Initiative proposes to require two covered parking spaces for two or more bedroom units.

The City's RHNA strategy was developed under the assumption that development would occur at densities up to 27 du/ac and up to 3 stories in height. In the event that the Initiative passes, the Initiative would not have an effect on the City's ability to meet its RHNA obligation.

4.2 NON-GOVERNMENTAL CONSTRAINTS

Market forces and environmental considerations can have a substantial impact on the local economy and housing stock. These forces, such as land and construction costs, availability of financing and local economic conditions are outside the control of government; however, local governments can help to mitigate negative consequences of market forces through programs and policy initiatives.

4.2.1 Environmental Constraints

Fire

In the Redlands, the highest fire risk areas are in San Timoteo and Live Oak Canyons and their neighboring ridgelines where the threat from wildfire is the highest. Prolonged droughts coupled with high winds and dry vegetation during the summer time creates the highest fire risk in these areas. Left uncontrolled, these

fires have the potential to damage or destroy structures, roadways, and utility systems, and disrupt the economy.

Wildland fire is a significant environmental concern in Redlands. This is particularly true in San Timoteo Canyon and Live Oak Canyon. Vegetation in these areas includes annual grasses and a variety of brush with low fuel moisture that are highly susceptible to and capable of carrying fire. Accompanied by drought conditions, extreme topography, and high winds, these fires can be devastating. The potential for wildland fires can be considered a constraint to development in this portion of Redlands. Thus, programs have been included as part of this Housing Element Update to direct development away from areas at higher risk of wildland fires and closer to areas less prone to wildfires.

Flood

Flooding has historically been a concern in Redlands, where moderate to heavy storms can overwhelm the area's drainages and intermittent waterways. Redlands is drained by four streams, each of which represents a potential flood hazard at peak flows: the Santa Ana River/Mill Creek, the Mill Creek Zanja (also known as Mission Zanja and Mission Storm Drain), San Timoteo Creek, and Live Oak Creek. The Santa Ana River/Mill Creek and the Mission Zanja pose particular flooding hazards to the Redlands.

In order to combat the significant flood risk Redlands faces, the City has been proactive with its building code. The Redlands Zoning Ordinance implements the policies of the General Plan. It contains provisions to mitigate potential hazards on floodplains. Chapter 18.136 establishes the Floodplain District (FP), which prohibits occupancy or encroachment of any structure or development that would obstruct the natural flow of floodwaters within a designated floodway (like the San Timoteo Creek or Santa Ana River); ensure that developments in the floodplain outside of the floodway remain above the design flood flow elevation; and to prevent economic loss of loss of life or property from excessive flooding.

Much of the TVSP area is within a 100-year flood zone. The City's municipal code provides standards for building within the flood plain that includes standards for both new and re-purposed buildings. No special approval or entitlement is needed to construct in the flood zone, only that the building pad be elevated at least 2 feet above the 100-year flood elevation. Because any new or repurposed building would be constructed above the flood elevation, the risk of flood damage is no greater than for dwelling units outside the flood zone.

Thus, compliance with existing building codes would not pose an environmental constraint to housing development.

4.2.14.2.2 The Local Housing Market

The value of housing in Redlands has gone up dramatically since 2000. Between 2000 and 2018, median home sales prices in Redlands increased 300 percent. In 2020 the median home sales prices in Redlands were \$499,105.¹⁵ Overall, Redlands has the highest median home sales price compared to communities

¹⁵ <https://www.zillow.com/redlands-ca/home-values/>

nearby. In 2020, the average price of a 3-bedroom home is approximately 2.25 times more expensive than in 2003.

According to the City’s Annual Progress Reports (APRs) the vast majority of housing produced in the City in recent years has been Above Moderate Income housing. While the City has little control over market perceptions and orientation, it can affect how that orientation is translated into housing products through its efforts to encourage the construction of affordable housing and to provide a regulatory climate to support that effort.

TABLE 4-34-3: MEDIAN HOME SALE PRICES IN REDLANDS AND NEARBY COMMUNITIES

| City | 2000 | 2012 | 2020 |
|----------------|-----------|-----------|-----------|
| San Bernardino | \$94,300 | \$119,536 | \$324,881 |
| Highland | \$122,200 | \$180,000 | \$365,250 |
| Redlands | \$152,200 | \$241,898 | \$456,332 |
| Yucaipa | \$116,400 | \$190,000 | \$404,175 |
| Loma Linda | \$151,300 | \$191,000 | \$450,890 |

Source: DQNews.com; 2013
CityData, Zillow 2020

TABLE 4-44-4: REDLANDS MEDIAN HOME SALES, 2003, 2007, 2012, 2020

| Number of Beds | Year | | | |
|----------------------------|-----------|-----------|-----------|-----------|
| | 2003 | 2007 | 2012 | 2020 |
| Condominiums | | | | |
| 1 | \$100,000 | \$160,000 | \$55,000 | \$139,000 |
| 2 | \$249,500 | \$255,500 | \$97,000 | \$195,000 |
| 3 | \$225,000 | \$290,000 | \$130,000 | \$305,000 |
| Single Family Homes | | | | |
| 1 | \$187,000 | \$382,500 | \$125,750 | - |
| 2 | \$153,000 | \$325,000 | \$165,250 | \$345,000 |
| 3 | \$220,000 | \$380,000 | \$200,000 | \$499,000 |
| 4 | \$207,000 | \$431,750 | \$280,000 | \$639,000 |
| 5 | \$610,000 | \$635,000 | \$401,000 | \$942,500 |

Sources: First American Real Estate Solutions (from County Assessor Data); HR&A, Inc; DQNews.com, 2013. Zillow 2020.

4.2.1-14.2.2.1 Land Costs

Land costs are one of the major components of housing development costs. Land prices vary to such an extent that it is difficult to give average prices within small geographic regions. Factors affecting the costs of land include overall availability within a given subregion; environmental site conditions and constraints;

public service and infrastructure availability; aesthetic considerations such as views, terrain, and vegetation; the proximity to urban areas; and parcel size.

Rising costs of land are often related to the limited availability of buildable land. In San Bernardino County, which has large expanses of buildable land, this has not historically been considered a problem. Recent sales data indicates that in Redlands the price per square foot of raw land ranges from \$0.15 in rural, hillside areas of the City to \$25.25 in the downtown area.¹⁶

4.2.1-24.2.2.2 Construction Costs

The cost of construction depends primarily on the cost of materials and labor, which are influenced by market demand. The cost of construction will also depend on the type of unit being built and on the quality of product being produced. The cost of labor is based on a number of factors, including housing demand, the number of contractors in the area, and the unionization of workers.

The construction cost of housing affects the affordability of new housing and may be considered a constraint to affordable housing in San Bernardino County. A reduction in construction costs can be brought about in several ways. A reduction in amenities and quality of building materials in new homes (still above the minimum acceptability for health, safety, and adequate performance) may result in lower sales prices. State housing law provides that local building departments can authorize the use of materials and construction methods if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the applicable building codes.

In addition, prefabricated, factory-built housing may provide lower-priced products by reducing labor and material costs. As the number of units built at once increases, savings in construction costs over the entire development are generally realized as a result of an economy of scale, particularly when combined with density bonus provisions.

Using current pricing sources, the average costs for a newly constructed 2,000-square-foot single-family home (not including land) in Redlands region would cost between \$228,000 - \$338,000. At the time of the writing of this Housing Element Update, materials costs are increasing, namely lumber prices. Lumber prices have risen more than 250 percent in the last year and the National Association of Homebuilders noted the increases added more than \$24,000 to the price of the average single-family home¹⁷. This price increase is a result of limited domestic supply because of the COVID-19 pandemic. Until the domestic lumber supply can catch up to the demand, prices will remain high and home builders will likely continue to pass the cost to homebuyers.

4.2.1-34.2.2.3 Interest Costs and Availability of Financing

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Jurisdictions can, however, offer interest rate write-downs to

¹⁶ (www.zillow.com Accessed April 15, 2021)

¹⁷ <https://markets.businessinsider.com/news/stocks/lumber-prices-hit-record-highs-soaring-past-year-2021-4-1030299977>

extend home purchase opportunities to lower-income households. In addition, government-insured loan programs may be available to reduce mortgage down-payment requirements.

It can be difficult for Very Low, Low, and Moderate income first-time homebuyers to acquire sufficient savings and income to pay for a down payment, closing costs, monthly mortgage, and tax and insurance payments.

4.2.1.44.2.2.4 Consumer Interest Rates

Even small increases to home loan interest rates can substantially affect monthly housing costs and reduce affordability to low- and moderate-income households. Table shows how changes in interest rates affect borrowing costs. For each one percentage point increase in the interest rate, borrowing costs increase by 6 to 7 percent for a 15-year home loan and 20 percent if the increase is from five to eight percentage points. For a 30-year loan, the effects are even more pronounced: each one percentage point increases the monthly payment 10 to 11 percent—nearly 37 percent if the increase is from five to eight percentage points.

TABLE 4-54-5: IMPACT OF INTEREST RATES ON MONTHLY MORTGAGE PAYMENTS

| | Monthly Payment on a 15-Year Loan | | | | Monthly Payment on a 30-Year Loan | | | |
|-----------|-----------------------------------|---------|---------|---------|-----------------------------------|---------|---------|---------|
| | 5% | 6% | 7% | 8% | 5% | 6% | 7% | 8% |
| \$100,000 | \$791 | \$844 | \$899 | \$956 | \$537 | \$600 | \$665 | \$734 |
| \$150,000 | \$1,187 | \$1,266 | \$1,349 | \$1,434 | \$806 | \$900 | \$998 | \$1,101 |
| \$200,000 | \$1,582 | \$1,688 | \$1,798 | \$1,912 | \$1,074 | \$1,200 | \$1,330 | \$1,468 |
| \$250,000 | \$1,978 | \$2,110 | \$2,248 | \$2,390 | \$1,343 | \$1,500 | \$1,663 | \$1,835 |
| \$300,000 | \$2,373 | \$2,532 | \$2,697 | \$2,868 | \$1,611 | \$1,800 | \$1,995 | \$2,202 |
| \$350,000 | \$2,769 | \$2,954 | \$3,147 | \$3,346 | \$1,880 | \$2,100 | \$2,328 | \$2,569 |
| \$400,000 | \$3,164 | \$3,376 | \$3,596 | \$3,824 | \$2,148 | \$2,400 | \$2,660 | \$2,936 |
| \$450,000 | \$3,560 | \$3,798 | \$4,046 | \$4,302 | \$2,417 | \$2,700 | \$2,993 | \$3,303 |
| \$500,000 | \$3,955 | \$4,220 | \$4,495 | \$4,780 | \$2,685 | \$3,000 | \$3,325 | \$3,670 |

Source: City of Redlands 5th Cycle Housing Element

Many consumers mitigate the impact of rising interest rates by purchasing adjustable rate mortgages that typically begin with substantially lower introductory rates. Adjustable rate mortgages allow a borrower's interest cost, and monthly payment, to rise or fall with market rates. In a rising interest rate climate, adjustable rate mortgages can offer substantial short-term savings over a fixed-rate loan. In a declining or highly volatile interest rate climate, adjustable rate mortgages can lead to higher short-term costs, as demonstrated in 2007. Presently, interest rates are at near historic lows which has increased the purchasing power of homebuyers; however this advantage has been offset by the increasing cost of new housing and has fanned the rapid increase of existing home prices.

4.2.1.54.2.2.5 Developer Interest Rates

Higher interest rates increase the cost of doing business for developers in two ways: (1) construction costs rise (most residential development is financed, at least in part, through construction loans), and (2) permanent borrowing costs increase. Table shows the impact of changes in loan rates on the monthly rent for hypothetical apartment projects that are privately financed and that receive state and/or federal funds. Three per-unit project costs are assumed: (1) a small apartment complex with minimal amenities that costs \$80,000 per unit to construct, (2) a medium quality apartment complex with average amenities that costs \$90,000 per unit to construct, and (3) a luxury apartment complex that costs \$100,000 per unit to construct. In each case the properties include a mix of one- and two-bedroom apartments. These examples assume that 75 percent of the project is financed at a commercial lending rate for a term of 15 years.

Therefore, a three percentage point increase in interest rates for permanent financing, from 6 percent to 9 percent, will increase the per unit borrowing cost by 20 percent and the overall per unit cost (accounting for operation and maintenance expenses) by about 10 percent.

TABLE 4-64-6: IMPACT OF INTEREST RATES ON COMMERCIAL BORROWING COSTS

| Per Unit Loan Amount (75% Financed) | Interest Rates | | | | |
|--|----------------|-------|-------|-------|-------|
| | 6% | 7% | 8% | 9% | 10% |
| \$60,000 | \$506 | \$539 | \$574 | \$608 | \$645 |
| \$67,500 | \$570 | \$607 | \$645 | \$684 | \$726 |
| \$75,000 | \$633 | \$674 | \$717 | \$761 | \$806 |

Source: City of Redlands 5th Cycle Housing Element

4.2.1.64.2.2.6 Financing Availability and Distribution

Given the increase in defaults on mortgages in Redlands and elsewhere in the region that resulted from the 2008 financial crisis, as well as the subsequent reaction from the Federal Reserve, the ability to borrow money has become more difficult. According to the 5th Cycle Housing Element, the most severe lending problem appeared to be with long-time homeowners in North Redlands who have substantial deferred maintenance on their properties. These owners often have trouble accessing capital to make improvements on their homes. Home Mortgage Disclosure Act (HMDA) data from 2019 supports this assertion as a continuing condition. The rate of approval for home improvement loans in North Redlands was 20 percent lower compared with approval rates for home purchase loans. In census tract 78 (Lugonia Colony area) no home improvement loans were originated in 2019.¹⁸

As for new homebuyers, there does not seem to be a problem obtaining loans from the bank, as long as the borrower has good credit. The Home Mortgage Disclosure Act (HMDA) data confirms that borrowing rates are fairly consistent throughout the city. On average, 72 percent of home purchase loans were approved in the city, up 2 percent from 2013; the rate in North Redlands is lower at 68.5 percent, although

18 Federal Financial Institutions Examination Council. Home Mortgage Disclosure Act. 2019 Mortgage Application and Approval Data by Census Tract.

one census tract in the neighborhood reports approval rates at 67 percent, the same as 2013. With the recent sub-prime mortgage crisis, lenders may be unwilling or not permitted under new standards to offer mortgages to individuals with low credit ratings. On the other hand, recent cuts to short-term interest rates by the Federal Reserve may lead to a decrease in mortgage rates, encouraging borrowing for mortgages and construction loans. In addition, deferred maintenance has become an issue with re-sales as well, since homes being purchased must be up to code.

5 QUANTIFIED OBJECTIVES, HOUSING GOALS, POLICIES, AND PROGRAMS

The goals, policies, and programs delineated in this chapter serve to support the State of California's overarching aim of providing, "decent housing and a suitable living environment for every Californian...is a priority of the highest order" (Government Code Section 65580). This Housing Element updates the prior list of programs by removing those that no longer serve the mission of providing housing for all, and includes new programs aimed at implementing meaningful and impactful change. Specifically, several of these new policies are tailored to the Transit Villages Specific Plan (TVSP) that the City is currently developing.

According to Government Code Section 65583 (b), local governments housing elements are required to establish quantified objectives for the maximum number of housing units which can be constructed, rehabilitated, and conserved over a five-year time frame. The objective for units to be conserved should include a subtotal for the number of at-risk units developed pursuant to Government Code Section 65583 (a)(9)(A).

Table presents the Housing Element's quantified housing objectives for the 2021-2029 projection period pursuant to Government Code Section 65583 (a)(9)(A).

TABLE 5-1: QUANTIFIED OBJECTIVES, 2021-2029

| Category | Extremely Low Income | Very Low Income | Low Income | Moderate Income | Above-Moderate Income | Total Objective |
|-------------------------------|----------------------|-----------------|------------|-----------------|-----------------------|-----------------|
| New Construction | 160 | 160 | 320 | 480 | 480 | 1,600 |
| Rehabilitation | 20 | 20 | 100 | 0 | 0 | 140 |
| Preservation of Units at Risk | 30 | 30 | 0 | 0 | 0 | 60 |

Populated figures are estimated averages for each category

The housing goals, policies, and programs that follow were created for the purpose of meeting the housing needs of the citizens of Redlands throughout the 2021-2029 planning period.

- **Goals** are the results that the City desires to achieve over the housing planning period. They are general expressions of values and aspirational outcomes and as a result, may not be fully attained. The goals are the foundation of the policies and actions to be implemented over the housing planning period.

- **Policies** are specific statements that guide decision-making. Policies serve as the fundamental tenets that support the overarching goal, and are statements of broad direction, philosophy, or standards to be achieved.
- **Programs** are the core of the City’s housing strategy, translating goals and policies into actions. These include on-going programs, zoning ordinance changes, procedural changes, and other actions that implement the housing policies and help the City achieve its goals. Each program identifies the responsible agency, funding source, timeframe for implementation, and specific objectives.

5.1 GOAL: HOUSING DEVELOPMENT AND VARIETY

A housing stock comprising of a variety of housing and tenancy types at a range of prices, within close proximity to services and opportunity, which meets the varied needs of existing and future City residents, who represent a full spectrum of age, income, and other demographic characteristics.

5.1.1 Policies

- 1.1 Provide adequate capacity to meet the Sites Inventory for Regional Housing Needs Assessment (RHNA).
- 1.2 Increase capacity and access to opportunities and services through the adoption of the Transit Villages Specific Plan.
- 1.3 Provide housing capacity near public services.
- 1.4 Realize capacity potential through minimum densities.
- 1.5 Maintain an up-to-date residential sites inventory and provide to interested developers with information on available development incentives.
- 1.6 Support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.
- 1.7 Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.
- 1.8 Incentivize the development of Accessory Dwelling Units as a means of providing a diversity in housing types in all areas within the City.
- 1.9 Incentivize efficient buildings and conservation.

5.2 GOAL: REMOVAL OF CONSTRAINTS TO THE PRODUCTION OF HOUSING

Removal of governmental policies or regulations that unnecessarily constrain the development, improvement, or conservation of market-rate or affordable housing. Also includes the sharing of information related to environmental and market constraints to identify challenges early in the development process.

5.2.1 Policies

- 2.1 Periodically review and update the Zoning Ordinance to stay abreast of updates to State law to reduce constraints to emergency shelters, low barrier navigation centers, supportive housing, and group homes.
- 2.2 Periodically review and update the Zoning Ordinance to address constraints on housing yield posed by development standards.
- 2.3 Establish objective design standards to facilitate streamlined project permitting.
- 2.4 Evaluate fee structures and permit costs to incentivize housing production.
- 2.5 Allow by-right approval of projects containing 20% or more units affordable to lower-income households.
- 2.6 Facilitate the production of mixed-use housing by clarifying development standards and evaluating the public review process for mixed-use development.
- 2.7 Continue to provide pre-application services and assistance to developers to identify non-governmental constraints early in the development process.

5.3 GOAL: PRIORITIZATION OF HOUSING FOR LOWER AND MODERATE INCOME AND SPECIAL NEEDS POPULATIONS

Adequate provision of housing for lower and moderate income and special needs populations requires special attention and prioritization from identifying sites, facilitating the development process, and maintaining and preserving housing. Includes services directed at homelessness and education for property owners and landlords.

5.3.1 Policies

- 3.1 Incentivize development of affordable housing by leveraging density bonuses.
- 3.2 Prevent displacement through the provision of replacement units at the same income level.
- 3.3 Prioritize water and wastewater service for affordable housing developments.
- 3.4 Working with the Housing Authority of San Bernardino County, provide outreach and education for tenants and landlords.
- 3.5 Working with the Housing Authority of San Bernardino County, actively address homelessness through coordination with service providers.
- 3.6 Examine an inclusionary housing ordinance as a means of providing affordable housing.
- 3.7 Prioritize surplus lands for affordable housing development.

5.4 GOAL: INCENTIVIZE AND PRESERVE HOUSING

Programs that conserve housing currently available and affordable to lower-income households, and programs that prevent or reverse deterioration in areas exhibiting symptoms of physical decline.

5.4.1 Policies

- 4.1 Coordinate with the Housing Authority of the County of San Bernardino to monitor, track and encourage preservation of affordable housing at-risk of loss or conversion to market rate housing.
- 4.2 Connect owners to resources to rehabilitate and improve the condition of existing affordable housing stock.

5.5 GOAL: AFFIRMATIVELY FURTHERING FAIR HOUSING

Promote equal opportunity for all residents to reside in the housing of their choice regardless of their special characteristics as protected under State and Federal fair housing law.

5.5.1 Policies

- 5.1 Prohibit discrimination in the sale or rental of housing with regard to characteristics protected under State and Federal fair housing laws.
- 5.2 Encourage the development of residential units that are accessible to disabled persons or are adaptable for conversion to residential use by disabled persons.
- 5.3 Reasonably accommodate persons with disabilities who seek waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.
- 5.4 Accommodate emergency shelters, low barrier navigation center, transitional housing, supportive housing, residential care facilities, and community care facilities in compliance with State laws.
- 5.5 Improve awareness, access, and use of education, training, complaint investigation, mediation services of the fair housing service provider, particularly in areas sensitive to displacement, low-income, racial/ethnic concentration, disability or other fair housing considerations.

5.6 GOAL: VARIED AND ADEQUATE FUNDING SOURCES

Identification of funding streams from a variety of sources to provide financial assistance to service providers and to fund programs.

5.6.1 Policies

- 6.1 Identify and review opportunities for funding.
- 6.2 Share funding opportunities with the development community/service providers.

5.7 HOUSING PROGRAMS

TABLE 5-15-1: PROPOSED PROGRAMS

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|--------------------------------|--|----------------------|--|---|-------------|
| 1.1 | | RHNA/Community Planning | | | | | |
| <u>1.1-1</u> | 1.1-1 | RHNA Rezoning | <p>Within three years of Housing Element adoption, rezone land to provide adequate capacity for at least 4,219 units on suitable sites.</p> <ul style="list-style-type: none"> - 1,898 very low and low income units - 782 moderate Income units - 1,538 above moderate income units <p>The rezoning program would <u>rezone a minimum of 119 acres and</u> provide for 30 du/ac with a minimum density of 20 du/ac for lower income sites. Each site will be able to accommodate a minimum of 16 units. The City will incorporate a replacement housing provision for any sites with existing residential use, <u>will permit multifamily uses without discretionary action.</u> -</p> | October 2024 | <ul style="list-style-type: none"> - 1,898 very low and low income units - 782 moderate Income units - 1,538 above moderate income units <u>-119 acres rezoned</u> | City of Redlands Development Services Department | Staff time |
| <u>1.1-2</u> | <u>1.1-2</u> | <u>Measure U Analysis</u> | <u>The City will conduct a detailed legal analysis of all aspects of Measure U to evaluate the consistency of Measure U</u> | <u>2022</u> | <u>Adopted Resolution by City Council making determinations on</u> | <u>City of Redlands Development Services Department</u> | <u>City</u> |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|---------------|-----------------|--------------------------------|--|----------------------|---------------------------------|--|------------|
| | | | <u>provisions with State housing laws.</u> | | <u>Measure U implementation</u> | <u>and City Attorney's Office</u> | |
| <u>1.1-32</u> | <u>1.1-21.1</u> | Transit Villages Specific Plan | <p>Adopt the Transit Villages Specific Plan by the end of 2022 to allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. Use the TVSP to facilitate smart-growth planning principles, downtown revitalization, and infill development. <u>The TVSP will allow for residential densities per the 2035 General Plan and 6th Cycle Housing Element and allow multi-family residential uses.</u></p> <p><u>TVSP area is a total of 947 acres. Currently 60 acres of vacant land available for mixed-use development within TVSP area.</u></p> <p><u>Draft TVSP use list allows multiple housing types by-right (Permitted use) including supportive and transitional housing.</u></p> | December 2022 | Adopted specific plan | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|---------------|-----------------|---|--|--|-------------------------|--|------------|
| <u>1.1-43</u> | <u>1.1-31.1</u> | By-Right Approval of Projects with 20 Percent Affordable Units on “Reused” Site | Pursuant to AB 1397, amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower-income households, on sites being used to meet the 6th cycle RHNA that represent “reuse sites” previously identified in the 4th and 5th cycles Housing Element, and on sites that are being rezoned to accommodate the lower-income RHNA. | October 2024 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.1-54</u> | <u>1.1-41.1</u> | No Net Loss Monitoring | Pursuant to SB 166 (No Net Loss), the City will develop a procedure to track: <ul style="list-style-type: none"> • Unit count and income/affordability assumed on parcels included in the sites inventory. • Actual units constructed and income/affordability when parcels are developed. • Net change in capacity and summary of remaining capacity in meeting remaining RHNA. | Development of the procedure by October 2022, ongoing maintenance thereafter | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.1-65</u> | <u>1.1-51.1</u> | Minimum Densities | Amend the Zoning Ordinance to establish minimum densities for residential and mixed-use zones to ensure that residential projects are developed close to | October 2024 | Adopted code amendments | City of Redlands Development | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|---------------|-----------------|--|--|--|--|--|------------|
| | | | their maximum densities (70% of the maximum allowed by base-zoning). | | | Services Department | |
| <u>1.1-76</u> | <u>1.1-61.1</u> | Achieving the General Plan Densities | Amend the zoning ordinance to ensure it is consistent with the Redlands 2035 General Plan. Specifically, ensure each implementing zone allows up to the maximum permitted by the General Plan, pursuant to AB 3194. | October 2024 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.1-87</u> | <u>1.1-71.1</u> | Development on Non-Vacant Sites | Establish an outreach and coordination program through the Economic Development Division to connect developers, builders, and owners of non-vacant sites. Program shall: (1) Emphasize reaching out to owners of on-vacant sites to discuss any interest in redeveloping and available incentives. (2) Marketing and advertising these sites to the development community along with any incentives that might be available. (3) Establish quarterly meetings with developers and builders. | Initiate by October 2022, and maintain throughout planning period <u>on a quarterly basis.</u> | Engage with 10 property owners of high-potential non-vacant sites each year. | City of Redlands Economic Development Division | Staff Time |
| <u>1.1-98</u> | <u>1.1-81.1</u> | Lot Consolidation and Small Site Development | The City may consider incentives to achieve orderly development, | Develop incentives | Adopted code amendments | City of Redlands | Staff Time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|--|---|--|-------------------------|--|------------|
| | | | improve pedestrian activity, and implement the goals, policies, and objectives of the Housing Element. The following incentives may be considered at the discretion of the (Planning Commission/City Council): (1) Parking reduction (2) Alternative parking arrangements (3) Signage bonus. City shall advertise and promote lot consolidation provisions to existing property owners and prospective mixed-use developers. | by October 2022 and adopt Zoning Ordinance Amendment by October 2023 | | Development Services Department | |
| 1.2 | | Removal of Constraints to the Production of Housing | | | | | |
| <u>1.2-1</u> | 1.2-1 | Emergency Shelters | Update the zoning ordinance to amend standards for emergency shelters to comply with recent changes to state law (AB 139). | October 2022 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.2-2</u> | 1.2-2 | Low Barrier Navigation Centers | Update the zoning ordinance to provide opportunities for Low Barrier Navigation Centers to comply with recent changes to state law (AB 101). | October 2022 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.2-3</u> | 1.2-3 | Transitional and Supportive Housing | Update the zoning ordinance to comply with changes to state | October 2022 | Adopted code amendments | City of Redlands | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|-----------------------|----------------|---------------|---|----------------------|-------------------------|--|------------|
| | | | law regarding Transitional and Supportive Housing, including allowing supportive housing by-right in zones where multifamily and mixed uses are permitted, pursuant to Government Code section 65651 . (SB 745 and AB 2162). | | | Development Services Department | |
| 1.2-4 | 1.2-4 | SRO Ordinance | Adopt a Single Room Occupancy (SRO) ordinance to provide additional housing opportunity for low and very-low income households near the planned Metrolink/ Arrow light rail stations. | October 2022 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| 1.2-5 | 1.2-5 | Group Homes | Review zoning provisions for large group homes (7+ persons) and implement mitigating strategies to remove potential constraints on the production of large group homes. Ensure zoning standards facilitate approval certainty and objectivity in the development of large group homes. Amend the Zoning Ordinance to allow group homes in all zones that allow residential uses. Amend Zoning Ordinance to clarify group homes/ community care facilities of 6 or fewer | October 2022 | Adopted code amendments | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|--|---|----------------------|--|---|------------|
| | | | <u>people do not need to be licensed by the State.</u> | | | | |
| <u>1.2-6</u> | 1.2-6 | FAR based development fees | Study and consider FAR based development fees (as opposed to unit based fees) to create financial incentives for the creation of additional units. | June 2025 | Adopted code or free schedule amendments | City of Redlands Development Services Department / Finance Department | Staff time |
| <u>1.2-7</u> | 1.2-7 | Amend Development Standards | Amend parking requirements, open-space standards, and setbacks for multi-family properties to further incentivize and encourage higher density development. | December 2023 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.2-8</u> | 1.2-8 | Ballot Measures: SECBS | Ensure that Socio Economic Cost Benefit Studies are reviewed and analyzed in an objective manner. Develop objective standards and thresholds for the SECBS checklist. <u>By October 2024, complete a City-initiated study that evaluates the effectiveness of measures and consider alternative actions if needed.</u> | October 2023 | Adopted code amendments or official interpretation | City of Redlands Development Services Department | Staff time |
| <u>1.2-9</u> | 1.2-9 | Ballot Measures: Environmental Impacts | Clarify and implement the "no environmental impact" provision of the ballot measures to allow and mitigate potentially | October 2023 | Adopted code amendments or official interpretation | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--|----------------|--|--|----------------------|-------------------------|--|------------|
| | | | significant impacts as allowed by CEQA . | | | | |
| 1.2-10 | 1.2-10 | Objective Design Standards: SB 330 | Pursuant to SB 330, review and revise development standards and design guidelines by the end of 2023 to ensure City requirements are objective, neutral, and feasible. Prior to the adoption of objective standards, City will continue to apply current standards in an objective manner. | December 2023 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| 1.2-11 | 1.2-11 | Density Bonus Update | Amend the Density Bonus Ordinance to comply with recent changes to state law (AB 2345). | October 2024 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| 1.2-12 | 1.2-12 | Mixed Uses in Commercial Zones | Amend the City's C-3, C-4, and A-P zones to create objective standards for mixed-uses and facilitate the redevelopment of commercial sites to mixed-use. | October 2024 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| 1.2-13 | 1.2-13 | Remove CUP Requirement for Multi-Family Developments | Amend the zoning ordinance to remove the conditional use permit requirement for multi-family developments of 35 units or more, buildings taller than 35 feet. | October 2024 | Adopted code amendments | City of Redlands Development Services Department | Staff time |
| 1.2-14 1.2-14 | 1.2-14 | Waive preapplication fee for affordable housing projects | Mitigate non-governmental and financial constraints by waiving pre-application meeting fees | October 2022 | Amended fee schedule | City of Redlands Development | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|----------------|----------------|---|---|----------------------|---|--|------------|
| | | | and providing technical assistance to housing projects that propose to provide below market-rate units. <u>Provide expedited processing for projects that propose low-income, extremely-low income, or special needs units.</u> | | | Services Department | |
| <u>1.2-155</u> | 1.2-15 | Non-governmental constraints. Environmental Information Mapped. | Continue to provide information and maps of known environmental constraints at the planning and zoning counter to provide additional clarity and certainty and mitigate non-governmental constraints for project applicants. | Ongoing | <u>Annually re-examine information and maps of known environmental constraints and update informational materials for the public.</u> | City of Redlands Development Services Department | Staff time |
| <u>1.2-166</u> | 1.2-16 | Floodplain Development | Review the City's development standards (such as setbacks, lot dimensions, etc.) within the floodplain to reduce the need for variances for projects needing to elevate structures to meet FEMA floodplain requirements. <u>Current code requires buildings to be sited near the sidewalk for urban development, however this presents challenges with elevating building pads out of the flood zone.</u> | December 2023 | Adopted code amendments; <u>adopt and implement Transit Village Specific Plan</u> | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|-------------------------|------------------------|--|--|-------------------------------|---|--|----------------------------|
| 1.2-177 | 1.2-17 | Definition of Family | Amend the definition of family to comply with state law. 1.2-17 | December 2022 | Adopted Code Amendments | City of Redlands Development Services Department | Staff time |
| 1.2-188 | 1.2-18 | Employee and Farmworker Housing | <p>Pursuant to Health and Safety Code section 17021.5, define and permit employee housing in compliance with the Employee Housing Act. Revise zoning to allow farmworker housing in all agricultural zones throughout the City.</p> <p>Pursuant to Health and Safety Code section 17021.6, employee housing for six or fewer employees is treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. Revise zoning to allow employee housing in all applicable zones throughout the City.</p> | December 2022 | Adopted Code Amendments | City of Redlands Development Services Department | Staff time |
| 1.2-19 | 1.2-19 | Streamlined Ministerial Approval Permit Procedures | The City will review its approval processes to ensure it accommodates streamlined | Ongoing | | City of Redlands Development | Staff Time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|------------------------|------------------------|--|--|----------------------|---|---|----------------------------|
| | | | applications, pursuant to Senate Bill 35. | | | Services Department / Facilities and Community Services Department | |
| 1.2-20 | 1.2-20 | Extend Affordability Covenant Time Length | The City will extend the affordability covenant time length from 55 years to 100 99 years | | Adopted Code Amendments | City of Redlands Development Services Department / Facilities and Community Services Department | Staff time |
| 1.3 | | Prioritization of Housing for Lower and Moderate Income and Special Needs Populations | | | | | |
| 1.3-1 | 1.3-1 | Surplus Lands | Annually review and assess City-owned properties and determine if they are considered "surplus lands" pursuant to the Surplus Lands Act. Dispose of any surplus property pursuant to the act and HCD guidance. Facilitate development through zoning reform, development incentives and expedited permit procedures. City will initiate zone | Annually | Annual report | City of Redlands Development Services Department / Facilities and Community Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|---|---|-------------------------------|-----------------------------------|---|------------|
| | | | <u>changes as necessary to facilitate housing development.</u> | | | | |
| <u>1.3-2</u> | 1.3-2 | Inclusionary Housing Ordinance | Conduct a feasibility study on the financial viability and potential of an inclusionary housing ordinance. If appropriate and financially feasible, adopt an inclusionary ordinance. | October 2023 | Draft report and code amendments | City of Redlands Development Services Department | Staff time |
| <u>1.3-3</u> | 1.3-3 | Displacement Prevention (SB 330 and AB 1397) | Pursuant to State law, amend the Zoning Ordinance by the end of 2022 to require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in the State Density Bonus Law. | December 2022 | No net loss of lower income units | City of Redlands Development Services Department | Staff time |
| <u>1.3-4</u> | 1.3-4 | Priority Water and Wastewater Service for Affordable Housing Developments | Adopt written policies and procedures <u>-consistent with State law.</u> . | <u>Adopt by October 2022.</u> | | City of Redlands Development Services Department / Municipal Utilities and Engineering Department | Staff Time |
| <u>1.3-5</u> | 1.3-5 | <u>Rental Inspection Program /</u> Landlord Registration | <u>The Rental Inspection Program enhances the quality of rental properties and thereby the quality of life for tenants</u> | Ongoing | <u>Annually</u> updated registry | City of Redlands Facilities and Community | Staff Time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|------------------------|---|---|---|--|--------------------|
| | | | <u>throughout the City and ensures that all rental properties are maintained in accordance with City standards. City inspectors inspect rental properties for exterior code violations and will issue corrective reports to property owners/landlords. Examples of reportable issues include: roof leaks, unsafe fire conditions, unsafe stairs, unmaintained landscaping or parking/driving areas. Continue existing program, provide resources for landlords.</u> | | | Services Department | |
| <u>1.3-6</u> | 1.3-6 | Outreach and Education | Educate and inform landlords about AFFH <u>through continuation of the Crime Free Program. Provide information and educational materials for, Housing Choice Vouchers, foreclosure assistance programs, the state's new source of income protection (SB 329 and SB 222)</u> on the City website and at the public counter. | <u>Ongoing</u> <u>Initiate by October 2022. Provide materials on an on-going basis. The website will be updated annually.</u> | Updated website and counter materials | City of Redlands Development Services <u>Police</u> Department / Facilities and Community Services Department | Staff time |
| <u>1.3-7</u> | 1.3-7 | Homeless Support | Administer CDBG funds received from the County to service providers including local non-profits. | Ongoing | Allocate between \$10,000 to \$12,000 of CDBG funds to provide supportive and transitional housing support to | City of Redlands Development Services Department | Staff time CDBG |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|---|--|---|--|---|------------------------|
| | | | <u>Prioritize funds that will assist with the development of housing for the unhoused population.</u> | | populations in need including the homeless population. | | |
| <u>1.3-8</u> | 1.3-8 | Homeless Support Assistance Program | Continue the operation of homeless assistance program through the Police Department. Assist in connecting homeless individuals to local service providers, as well as continue to fund for shelter beds with available grant funding and donations. | Ongoing | The city funds 3 shelter beds that are operated by Steps 4 Life through grant funding, as well as annual donation from an anonymous annual donation in the amount of \$18,000. | City of Redlands Police Department | General Fund, Donation |
| <u>1.3-9</u> | <u>1.3-9</u> | <u>Facilitate Tenant Protection Act of 2019 (AB 1482) Compliance</u> | <u>Ensure compliance with new state tenant protection measures, including maximum annual rent increases, just cause evictions, and financial compensation requirements to stabilize residents living in areas at risk of displacement, including the area of high segregation and poverty in downtown Redlands.</u> <u>In coordination with Program 1.5-11, provide information to landlords and tenants regarding tenant protections and post information online and in community centers.</u> | <u>Ongoing</u> <u>Post information within 6 months of housing element adoption</u> | <u>Make information about the Facilitate Tenant Protect Act of 2019 available at the planning counter and during outreach events. Refer inquiries to Inland Fair Housing and Mediation Board, the City's contracted fair housing service provider.</u> | <u>City of Redlands Development Services Department</u> | <u>Staff Time</u> |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|---|---|----------------------|---|--|------------|
| 1.4 | | Incentivize and Preserve Housing | | | | | |
| <u>1.4-1</u> | 1.4-1 | Preservation of at risk housing | <p>The City has an inventory of 120 publicly assisted housing units affordable to lower income households. These units are deed restricted for long-term affordability. Between October 15, 2021 and October 2029, 60 publicly assisted units at the Citrus Arms development are on a 5-year contract which has historically been renewed, however are considered at risk of converting to market rate housing.</p> <ul style="list-style-type: none"> - Monitor Project Status Annually - Ensure property owners comply with extended noticing requirements under state law. - Include preservation as an eligible use in notices of funding availability. - Proactively coordinate with qualified entities. - Assist with funding or support funding applications. - Educate, support and assist tenants. | Annually | No net loss of publicly assisted housing units – work with property owners and operators to extend the period of affordability. | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|-----------------------|----------------|---|---|-------------------------------|--|--|------------|
| 1.4-2 | 1.4-2 | Rehabilitate and improve condition of existing affordable housing stock | Make available on the City website and at the Planning Department information on programs and resources available to property owners for assistance with home repairs and improvements. | Ongoing | Provide information to assist the rehabilitation low-income homes. | City of Redlands Development Services Department | Staff time |
| 1.5 | | Affirmatively Furthering Fair Housing | | | | | |
| 1.5-1 | 1.5-1 | Place Based Improvements | The City applies for and receives an annual allocation of CDBG funds from the County. These funds are used to install and upgrade public facilities (sidewalks, alleyways, ADA accessibility improvements) in lower income neighborhoods or where civic services are offered. Prioritize CDBG funds for the development of low income housing and special needs housing, with place based improvements surrounding those projects. | Annually apply for CDBG funds | List of priority capital improvements | City of Redlands Municipal Utilities and Engineering | CDBG |
| 1.5-2 | 1.5-2 | Coordinate with Inland Fair Housing and Mediation Board | Continue to utilize the County's contract with the Inland Fair Housing and Mediation Board to provide fair housing services, testing, and resources to residents of Redlands. | Ongoing | Provide fair housing services to 100 residents of Redlands over the 2021-2029 planning period. | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|------------------------------|----------------|---|---|----------------------|--|--|------------|
| <u>1.5-3</u> | 1.5-3 | Promotion of Fair Housing Information | Publicize Fair Housing Information, including information about tenants' rights, landlord requirements, and recent litigation on the City's website, social media platforms, and through physical promotional material (e.g. flyers, posters). | Ongoing | Clear and easily accessible fair housing resources | City of Redlands Development Services Department | Staff time |
| <u>1.5-4</u> | 1.5-4 | Expand fair housing outreach in communities with disproportionate needs | Amend and expand fair housing outreach to facilitate dialogue with communities facing disproportionate needs. Host a community feedback meeting annually to obtain resident feedback on community planning issues, fair housing topics, and ongoing City programs. | Ongoing | One fair housing workshop per year | City of Redlands Development Services Department | Staff time |
| <u>1.5-5</u> | 1.5-5 | Fair Housing Reporting | Acquire and analyze data from Inland Fair Housing and Mediation Board annually to review potential areas of fair housing issues. | Ongoing | Conduct analysis and report results/findings of any potential fair housing issues in Redlands annually | City of Redlands Development Services Department | Staff time |
| <u>1.5-6</u> | 1.5-6 | Regional Coordination | Participate in regional efforts and coordination to respond to discrimination and fair housing issues, and monitor progress towards addressing | Ongoing | | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|------------------------|----------------|--|--|---|--|--|-----------------------|
| | | | impediments to fair housing choice. | | | | |
| 1.5-7 | 1.5-7 | Enforcement of Fair Housing Laws | Accept Fair Housing violation complaints and forward to the Fair Housing and Mediation Board for enforcement. | Ongoing | Track and annually report the number and nature of fair housing questions, complaints and referrals to the service provider. | City of Redlands Development Services Department / Facilities and Community Services | Staff time |
| 1.5-8 | 1.5-8 | Increasing Residential Development in High and Opportunity in Area Transit Accessible and Smart Growth Areas with Disproportionate Needs | Through the Transit Villages Specific Plan, provide additional capacity for residential development in the City's highest opportunity areas. Implement the TVSP to revitalize the City's downtown and areas around the train stations, and transform areas with disproportionate needs and environmental risks to areas of high opportunity and wellbeing. | 2023 | Annual progress report on TVSP implementation. | City of Redlands Development Services Department | SB2 funds, Staff time |
| 1.5-9 | 1.5-9 | Mobile Home Park Preservation | Continue to implement the Mobile Home Rent Control ordinance to prevent displacement of lower-income and at risk populations. | Ongoing | Assist 200 mobile home unit owners per year | City of Redlands Development Services Department | Staff time |
| 1.5-10 | 1.5-10 | NOFA/Non-Profit Housing Development | Identify funding from federal, State, and local sources to expand affordable housing opportunities within the City and share these opportunities | Ongoing Identify and share information by October | Updated list of funding resources. Send letters to affordable housing | City of Redlands Development | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|---------------|----------------|---|---|---|---|--|--------------------------------------|
| | | | with local service providers and the development community. <u>Prioritize these opportunities to identified developers of low-income housing and supportive housing.</u> | <u>2022. Provide materials on a quarterly basis.</u> | <u>developers twice a year to inform the developers about the City's RHNA inventory.</u> | Services Department | |
| <u>1.5-11</u> | 1.5-11 | Provide training for multi-family housing landlords | Continue to provide 2-day Crime-Free Multi-Housing/Rental Property Training to multi-family landlords in the City to educate landlords on a wide range of issues including eviction process, Fair Housing issues, tenant screening, <u>acceptance of HCVs as a legitimate source of income</u> , and others. Ensure that landlords are aware of new source of income discrimination laws. | Ongoing | Once or twice a year <u>Minimum of once per year</u> | City of Redlands Police Department | Staff time with volunteer assistance |
| 1.6 | | Accessory Dwelling Units | | | | | |
| <u>1.6-1</u> | 1.6-1 | Educational Campaign and Information | Promote <u>information</u> and tools available to facilitate ADU construction. Provide easily accessible information on the City's website, at the zoning counter. Coordinate with SBCTA to utilize regional resources and adopt policies, procedures, and standards consistent with | <u>Identify information resources and tools by October 2022 and provide information on an ongoing</u> | Increase ADU production annually. <u>Revise fee structures to reduce cost for constructing ADUs.</u> | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|-----------------------|----------------|---|--|---|---|--|---|
| | | | neighboring jurisdictions to streamline ADU applications. Encourage ADU and SB 9 production in southern Redlands and high resource areas. | basis. Ongoing | | | |
| 1.6-2 | 1.6-2 | Pre-Approved Plan Sets | Make a variety of example ADU plan sets available to facilitate reduced applicant cost and expedited review for ADUs. Ensure example plans provide choices and diversity in size to accommodate a variety of household sizes and types. | October 2022 | 3 example or model ADU plan sets | City of Redlands Development Services Department | Staff time SBCTA REAP funded ADU program |
| 1.6-3 | 1.6-3 | Updated ADU Regulations to meet state law | Amend the Zoning Ordinance to address multiple recent changes to state law regarding ADUs (including AB 587, AB 671, AB 68, and SB 13). Monitor state law on an ongoing basis and revise the Zoning Ordinance as appropriate. | October 2024 | Annual assessment for consistency | City of Redlands Development Services Department | Staff time |
| 1.6-4 | 1.6-4 | ADU Tracking and Monitoring | Annually monitor the development and affordability of ADUs. If trends indicate a potential shortfall in meeting the estimated ADUs in the sites inventory, consider additional efforts to incentivize ADU production and reassess and revise the overall sites strategy for the RHNA within one year | Ongoing | Annual Progress Report and ADU construction | City of Redlands Development Services Department | Staff time |

| Index Number | Program Number | Program Title | Program/Action Description | Completion Timeframe | Quantified Objective | Responsible Agency | Financing |
|--------------|----------------|--|--|--|---|--|------------|
| | | | through adjusting ADU capacity assumptions with actual permitted units, and/or identifying additional sites to expand site capacity to the extent necessary to accommodate the RHNA. | | | | |
| 1.7 | | Efficient Buildings and Conservation | | | | | |
| <u>1.7-1</u> | 1.7-1 | Reclaimed Water | Continue to require the installation of reclaimed water infrastructure by new development when feasible. | Ongoing | <u>Approve reclaimed water for 500 units.</u> | City of Redlands Municipal Utilities and Engineering | Staff time |
| <u>1.7-2</u> | 1.7-2 | Lighting efficiency | Make available and distribute informational materials during the building permit process about energy efficient lighting for residential buildings. | Ongoing <u>activity, post information on City website by October 2022</u> | <u>Retrofit lighting efficiency for at least 100 residential units.</u> | City of Redlands Building and Safety Division | Staff time |
| <u>1.7-3</u> | 1.7-3 | Pursue Energy Efficient/Alternative Energy Funding | Increase efficiency and pursue alternative energy opportunities. | Ongoing | <u>100 residential units retrofitted for emergency efficiency.</u> | City of Redlands Building and Safety Division | Staff time |

6 REVIEW OF PAST ACCOMPLISHMENTS

6.1 PURPOSE OF REVIEW

State law (California Government Code Section 65588(a)) requires that each jurisdiction “review its housing element as frequently as appropriate to evaluate all of the following:

- (1) The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal.
- (2) The effectiveness of the housing element in attainment of the community’s housing goals and objectives.
- (3) The progress of the city, county, or city and county in implementation of the housing element.
- (4) The effectiveness of the housing element goals, policies, and related actions to meet the community’s needs, pursuant to paragraph (7) of subdivision (a) of Section 65583.”

According to the California Department of Housing and Community Development (HCD), the three areas of requisite analysis are:

- Review the results of the previous housing element’s goals, objectives, and programs. The results should be quantified where possible but may be qualitative where necessary.
- Compare what was projected or planned in the previous housing element to what was actually achieved. Determine where the previous housing element met, exceeded, or fell short of what was anticipated.
- Based on the above analysis, describe how the goals, objectives, policies, and programs in the updated housing element are being changed or adjusted to incorporate what has been learned from results of the previous housing element.

6.2 HOUSING PRODUCTION, REHABILITATION, AND CONSERVATION

The Housing Element established quantified objectives for new, rehabilitated, and preserved housing stock, as shown in Exhibit 1, Quantified Objectives of the 5th Cycle Housing Element. Ultimately, the objective identified a total of 2,880 new, rehabilitated, and conserved units over the 5th Cycle (Housing Element, page 7-2), which is consistent with and exceeded the regional housing needs assessment (RHNA) goal of 2,429 units across all income levels.

EXHIBIT 1: QUANTIFIED OBJECTIVES OF THE 5TH CYCLE HOUSING ELEMENT

| Income Category | RHNA 2014-2021 | New Construction | Rehabilitation | Conservation/ Preservation | Total (New Construction, Rehab, and Conservation/ Preservation) |
|---|-------------------|---------------------|----------------|-------------------------------|---|
| Extremely Low (less than 30% of AMI) ¹ | | 280 | 20 | 30 | 330 |
| Very Low (between 30-50% of AMI) | 579 | 300 | 20 | 30 | 350 |
| Low (between 50-80% of AMI) | 396 | 400 | 100 | 0 | 500 |
| Moderate (between 80-120% of AMI) | 453 | 500 | 0 | 0 | 500 |
| Above Moderate (over 120% of AMI) | 1,001 | 1,200 | 0 | 0 | 1,200 |
| Total | 2,429 | 2,680 | 140 | 60 | 2,880 |

1. The "extremely low-income" category is not included in the Regional Housing Needs Assessment (RHNA). However, cities are charged with addressing the housing needs of this population in the housing element. The extremely low-income totals are based on an estimated average of 50% of all very low-income (between 30-50% of AMI) participants in all active programs. This estimation is also based on the percentage of Redlands households whose income falls below 30 percent of AMI, according to the 2007-2011 ACS.

Source: Table 7.1-1: Quantified Objectives in 5th Cycle Housing Element.

6.3 HOUSING PRODUCTION: 2013-2019

The 2019 Housing Element Annual Progress Report (APR) demonstrates that the City has not met these quantified objectives. Table , below, demonstrates that the City has permitted a total of 469 units since 2013, including 1 unit of very low-income housing, 18 units of low-income housing, 4 units of moderate-income housing, and 446 units of above-moderate housing. There are 1,960 total remaining units in the RHNA. The City has also approved many units that are still pending construction, including 80 deed-restricted units for lower-income veterans.

6.4 REHABILITATION

In 2016, the City of Redlands began to utilize the 'City Works' program to track records pertaining to home rehabilitation. Since 2016, 11 homes have been substantially rehabilitated, all of which were single-family dwellings. Of these, 5 were deemed to be unsafe structures. Of these 5 unsafe/uninhabitable structures, 3 were unsafe/inhabitable due to fire damage, and 2 became unsafe/uninhabitable structures after unpermitted work was performed to the structure. Additionally, the APRs from 2014 to 2019 indicate that no units were rehabilitated. This is short of the goal of 140 rehabilitated units.

6.5 CONSERVATION/PRESERVATION

The APRs from 2014 to 2019 indicate that no units were conserved/preserved, short of the goal of 60 units.

6.6 EFFECTIVENESS AT ASSISTING SPECIAL NEEDS POPULATIONS

In the previous element, the City included many programs to address the needs of special needs populations, including the populations described below. The following describes the efforts of the City in meeting these special needs.

6.6.1 CBDG Funds

The City has utilized CDB funds to make neighborhood improvements, including accessibility improvements. In the 2020-2021 fiscal year, HUD allocated \$427,405 in CDBG funds to the City of Redlands.

Funds used including the following neighborhoodneighborhood improvements:

- Alleyway Improvements Paving in CDB Target Areas
- ADA Improvements consisting of removal of architectural barriers at various public facilities
- Sylvan Park restroom rehabilitation

Additionally, the City provides CDBG funding the following service providers:

- Family Service Association of Redlands
- YMCA of the East Valley
- Inland Temporary Homes
- Boys and Girls Club
- San Bernardino Sexual Assault Services
- Steps 4 Life (rapid re-housing program)

6.6.2 Extremely Low Income Population

The City has maintained the Mobile Home Rent Control Ordinance which limits rent increase to no more than the CPI index in each given year. This ordinance will continue into the next cycle. This ordinance supports the special needs of the population residing in Redlands 7 mobile home parks.

The City allocates CDBG funds to Inland Temporary Homes. Inland Temporary Homes provides Eviction Prevention Assistance due to COVID-19 related impact for anyone up to 80% AMI, which can prevent covid-related displacement.

Redlands Family Service received CDBG grants from the City. Redlands Family Service provides rental assistance to qualifying families.

6.6.3 Homeless

The City allocated CDBG funds to Inland Temporary Homes and the Family Service Center of Redlands. Inland Temporary Homes used these funds from the City to provide services such as housing navigation, security deposit, rental assistance, utility deposits, case management, mental health services, life skills classes, and follow-up services with rapid rehoused individuals. Redlands Family Service provides emergency rental assistance, food assistance, clothing, bus passes, gas cards, hygiene kits, classes, a computer lab, and employment referrals.

In 2018 the Redlands Police Department launched a Homeless Outreach Program that created the role of the Community Outreach Coordinator. The Community Outreach Coordinator partners with local service providers and faith-based organizations to provide resources to and seek positive long-term solutions for persons experiencing homelessness in Redlands. ~~The police department also has a homeless liaison.~~

6.6.4 Elderly

The City runs a Redlands Senior Citizen Hotline that support residents 55 years or older in crisis. The Elderly may contact this line for support with meals, groceries, routine calls as part of the “Never Alone” project, and health and safety verification.

The City also runs a senior transportation program that provides discounted rides to elderly residents who are unable to provide their own transportation for necessary services.

The City allocates CDBG funds to Inland Temporary Homes, which provides Eviction Prevention Assistance due to COVID-19 related impact. This support provided the elderly with the opportunity to find solutions to maintain their homes while maintaining their health.

6.6.7 ADEQUATE SITES FOR 5TH CYCLE RHNA

For the 5th Cycle Housing Element, the City was allocated 2,429 housing units as its share of the regional housing need. Table 1, RHNA Allocation by Income Category, shows the distribution of this regional share into four income categories.

TABLE 6-16-1: 5TH CYCLE RHNA ALLOCATION AND PRODUCTION BY INCOME CATEGORY

| | Very Low | Low | Moderate | Above Moderate | Total |
|----------------------------------|----------|-----|----------|----------------|-------|
| 5 th Cycle Allocation | 579 | 396 | 453 | 1,001 | 2,429 |
| Units Permitted | 1 | 18 | 4 | 446 | 469 |
| Remaining Allocation | 578 | 378 | 449 | 555 | 1,960 |

The 5th Cycle provided capacity for 3,849 units (Table 4.1-1 of the 5th Cycle Housing Element). At the beginning of the 5th Cycle, the City amended the Downtown Specific Plan allow for high density multi-family housing by-right. These amendments significantly increased zoned capacity for all income levels in Redlands.

The City reviewed its previous RHNA sites, past approvals, and the zoning code and determined that it has maintained adequate sites to meet the RHNA for all income levels throughout the 5th Cycle.

6.76.8 HOUSING ELEMENT PROGRAMS: ASSESSMENT OF ACCOMPLISHMENTS

The 5th Cycle Housing Element contains 60 “programs,” many of which are simply routine services and staff functions that need not be identified as Housing Element programs. Many housing programs are repetitive and represent specific activities that can be grouped into one program. For ease of annual reporting and tracking of measurable actions, the 6th Cycle Housing Element programs were modified as shown below.

When considering the performance of programs in the 5th Cycle, there are three aspects affecting its implementation:

1. The lack of timely implementation
2. Actions the City will take to better implement programs in the 6th Cycle, and
3. The effectiveness of programs

In 2012, the State abolished redevelopment in California. The City’s Redevelopment Agency, as was the case in most cities statewide, was most involved with housing and housing programs. The elimination of Redevelopment eliminated the City’s only dedicated funding source for affordable housing. This affected not just programs but also staff for administering affordable housing activities such as the variety of programs included in the 5th Cycle Housing Element. Going forward, for the 6th Cycle, the City will be dedicating certain staff resources to affordable housing activities and will be able to implement the Housing Element more effectively.

This section evaluates the programs identified in the 5th Cycle Housing Element and evaluates the progress of the programs using the 2019 APR. Evaluation notes and recommendations are in the accomplishments column.

TABLE 6-26-2: 5TH CYCLE PROGRAMS

| Name of Program | Objective | Time Frame | Status (2019 APR) | Accomplishments: Results and Evaluation |
|--|---|------------|--|---|
| 7.1-1 Make Zoning Ordinance Changes for Group Homes, Boardinghouses, and Single Room Occupancy (SRO) Units | Evaluate and modify the zoning ordinance. | 8/1/2014 | Development Services Department staff plans to accomplish this task in 2020. | No accomplishments <u>due to lack of staffing resources.</u> Continued Appropriateness: Retained and modified. <u>-See Programs 1.2-4 and 1.2-5.</u> |

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|--|--|-----------|--|--|
| 7.1-2 Implement Zoning Ordinance to Include Standards for Single Room Occupancy (SRO) Housing within the Downtown Specific Plan Area | Provide a valuable source of affordable, low-cost housing. | 10/1/2020 | The City is working on adopting a Transit Villages Specific Plan for land areas close to the City's three rail stations. Once adopted, the Transit Villages Specific Plan will replace the Downtown Specific Plan. Standards for SRO are expected to be addressed in the Transit Villages Specific Plan. | Staff is currently developing the Transit Villages Specific Plan, which will revise SRO standards within in the current Downtown Specific Plan area. Continued Appropriateness: Revised. See Program 1.1-31.1-2. |
| 7.1-3 Treat Transitional Housing the Same as Other Residential Uses in the Same Zone | Continue current practice to treat transitional and supportive housing the same as any other residential use in the same zone. | 10/1/2021 | Development Services Department is initiating an effort to amend the zoning code to address transitional and supportive housing so that they are treated the same as other residential uses in the same zone. | Continued Appropriateness: Modify. See Programs 1.2-31.2-3, and 1.2-51.2-5. |
| 7.1-4 Encourage Limited Equity Cooperatives. Retain Existing Policy of Encouraging Formation of Limited Equity Stock Cooperatives | Encourage and support cooperatives in Redlands. | 10/1/2021 | Ongoing. The City has not received any applications for a Limited Equity Cooperative. If the City receives an application, it will work with the applicant to facilitate creation of a cooperative. | No accomplishments. <u>There are existing cooperatives in the City, however, there have been no new applications for housing cooperatives during the 5th Cycle.</u> Continued Appropriateness: Remove. |
| 7.1-5 Maintain Second Unit Dwelling Unit Ordinance | Maintain the existing ordinance and keep track of second units being developed under the ordinance. | 10/1/2021 | The City is enforcing the state's Accessory Dwelling Unit ordinance while initiating a zoning code amendment to adopt the City's own Accessory Dwelling Unit ordinance. | The City has not adopted revisions to the Second Dwelling Unit ordinance (RMC 18.156.440). <u>The Ordinance has been drafted and re-worked by Development Services Staff and sent to the City Attorney for review. This review is pending. In the interim, the City is implementing State law.</u> |

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| | | | | Continued Appropriateness: Modify The City is including new Programs 1.6-1.6- to update the ADU ordinance to meet state requirements, track ADUs, and facilitate ADU production for lower-income households. |
| 7.1-6 Launch Second Dwelling Unit Public Awareness Campaign | Inform the public about the opportunity to build second units in any residential zone on a parcel with an existing single-family unit. | 10/1/2021 | The City is enforcing the state's Accessory Dwelling Unit ordinance while initiating a zoning code amendment to adopt the City's own Accessory Dwelling Unit ordinance. The public awareness campaign will be included in the public comment/review process of ordinance adoption. | The City has updated its website to provide clear, accessible, and relevant information regarding the ability to build ADUs. The City has not adopted revisions to the Second Dwelling Unit ordinance (RMC 18.156.440). Continued Appropriateness: Modify. See Program 1.6-1.6-1. |
| 7.1-7 75/25 Ratio | Maintain as a long-term planning goal, in accordance with Measure U, 75% single-family units to 25% multifamily units at General Plan buildout. | 10/1/2021 | Ongoing. | Continued Appropriateness: Remove This program does not further housing access in the City, and is a requirement based on the Measure U referendum. The program is superseded by Housing Element Law. |
| 7.2-1 Support Housing Providers | Support efforts of for-profit and nonprofit housing sponsors in constructing, acquiring, and improving low- and moderate-income housing. | 10/15/2021 | Ongoing. | No accomplishments. There are no verifiable City-initiated efforts to create a partnership or support housing developers in Redlands. <u>The City did approve an 80-unit affordable housing project (deed restricted). City staff assisted the developer through the application process and recommended</u> |

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|---|---|-----------|--|---|
| | | | | <p><u>approval, though no partnership was established.</u></p> <p>Continued Appropriateness: Remove.</p> <p>The City is including many programs specifically designed to facilitate low and moderate-income housing production through Programs 1.11-1-x, 1.31-3-x, and 1.41-4-x.</p> |
| 7.2-2 Continue Use of Mortgage Revenue Bonds | Participate in mortgage-revenue bond programs undertaken by the County of San Bernardino. | 8/1/2014 | The County of San Bernardino is currently not pursuing use of mortgage revenue bonds at this time. Due to historically low interest rates on the open market the program is not competitive. | <p>No accomplishments. <u>This program proved to not be viable in current market conditions.</u></p> <p>Continued Appropriateness: Remove.</p> |
| 7.2-3 Determine the Feasibility of Using Mortgage Credit Certificates | Determine the feasibility for a program in Redlands. | 8/1/2014 | Ongoing. | <p>No accomplishments. It is unknown if staff contacted agencies within six months of adoption of the 5th Cycle Housing Element. <u>Due to staff turnover, this information is not available.</u></p> <p>Continued Appropriateness: Remove.</p> |
| 7.2-4 Participate in the (HUD) HOME Investment Partnership Program for Multi-Family Housing | Provide funds for new construction, acquisition or rehabilitation of multifamily housing. | 10/1/2021 | The City continues to explore all available resources and partnership opportunities. | <p>No accomplishments.</p> <p>Continued Appropriateness: Remove</p> <p>The City does not administer or facilitate acquisition of HOME or CDBG funding.</p> |
| 7.2-5 Promote the Use of Low-Income Housing Tax Credits | Provide assistance in accessing low-income housing tax credits and a means of | 10/1/2021 | Ongoing. The City assists developers in applying for low-income housing tax | <p>No accomplishments.</p> <p>Continued Appropriateness: Remove.</p> |

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|--|--|-----------|--|--|
| | financing low-income housing development. | | credits when there is an opportunity. | This program is a standard city process. The City will continue to assist developers in applying for low-income tax credits as opportunities arise. |
| 7.2-6 Continue Public Housing and Section 8 Programs | Develop, maintain, and improve extremely low-, very low-, and low-income housing. | 10/1/2021 | The City cooperates with the Housing Authority of San Bernardino County (HASBC) in locating suitable sites or existing properties that can be rehabilitated, and in obtaining funding to create public housing or Authority-owned Section 8 units. | No accomplishments. The APRs indicate that there have been no units of housing that have been rehabilitated/improved. It is not clear that the City has directly facilitated acceptance or construction of units that allow Section 8 funding. <u>With the cessation of Redevelopment Agencies, the City transferred many of its housing duties to the Housing Authority of San Bernardino.</u> Continued Appropriateness: Modify The City has modified this program through programs 1.41-4-X, which will incentivize and preserve at-risk housing. |
| 7.2-7 Continue Mobile Home Rent Control | Limit rent increase in existing parks to no more than the CPI index for that year. | 10/1/2021 | Ongoing. | The City continues implementation of rent control ordinance. Continued Appropriateness: Retain Program 1.5-91.5-9. |
| 7.2-8 Implement Housing Referral and Placement Program | Link those needing housing with those wanting to share their homes or take advantage of the City's Second Dwelling Unit ordinance. | 2/1/2016 | Delayed due to a lack of staff resources. However, the City is enforcing the state's ADU ordinance and has been approving ADUs subject to development standards set forth by the state. | No accomplishments. Continued Appropriateness: Remove. The City is continuing to facilitate lower-income ADU occupancy through Programs 1.61-6-X. |

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| 7.2-9 Remove Constraints to Affordable Housing Development in Downtown | No longer require a CUP for housing development in Zones C-3 and C-4 in Downtown. | 12/1/2014 | The City was awarded a Caltrans grant to work on the Transit Villages Specific Plan in anticipation of the Metrolink/ Arrow light rail trains coming to three new train stations in the City, including a new station at Downtown Redlands. Once the plan is adopted, it will replace the Downtown Specific Plan. Removal of constraints to affordable housing development in Downtown will be analyzed and incorporated into the Specific Plan. | Staff is currently developing the Transit Villages Specific Plan, which will replace the Downtown Specific Plan. Continued Appropriateness: Combine Combine all programs involving the Transit Villages/Downtown area into a single program (Program 1.1-31.1-2). |
| 7.2-10 Transit Oriented Development (TOD) | Promote TOD in Redlands by providing a 25% housing density/FAR bonus to projects located within a half-mile of the proposed transit station. | 12/1/2015 | Ongoing. City offers density bonus consistent with the state law. The City is currently developing a Transit Villages Specific Plan to replace the Downtown Specific Plan. | No accomplishments. <u>This program was originally intended for a comprehensive update of the current Downtown Specific Plan. This has been replaced with the new Transit Villages Specific Plan, currently undergoing environmental review.</u> Continued Appropriateness: Combine Combine all programs involving the Transit Villages/Downtown area into a single program. See Program 1.1-31.1-2. |
| 7.2-11 Assist with Foreclosure Prevention | Help Redlands homeowners avoid foreclosure by promoting available assistance programs. | 10/1/2021 | Ongoing. City includes and provides information about foreclosure assistance programs at the counter and City website. | Implemented. <u>A record was not kept of updates to the foreclosure prevention resources.</u> |

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| | | | | <p>Continued Appropriateness: Retain<u>Modify</u>. See Program 1.3-61.3-8.</p> <p><u>The City will change its practices to review the website annually. This information will continue to be provided at the counter. The City's 6th Cycle Housing Element proposed several cross-coordinated programs to better provide information and materials to residents by way of website updates, hard copy materials at the Planning counter, and outreach events.</u></p> |
| 7.2-12 Lot Consolidation | Encourage lot consolidation to promote affordable housing development. | 10/1/2021 | Ongoing | <p>The City uses its 5th Cycle inventory to identify opportunities for lot consolidation. There are no dedicated implementation actions other than maintaining the sites inventory for lower-income sites.</p> <p>Continued Appropriateness: Modify The program was modified to include more specific actions. <u>See Program 1.1-9.</u></p> |
| 7.2-13 Incentive for Private Land Assembly | Provide an additional incentive beyond that provided by the state-required density bonus. | 2/1/2015 | City does not have resources to provide additional incentives. | <p>No accomplishments. <u>The City was unable to appropriate or identify resources to implement this program.</u></p> <p>Continued Appropriateness: Remove</p> |

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| 7.3-1 Continue to Work with Nonprofit Organizations to Identify the Need for Group Homes and Community Care Facilities for Individuals Unable to Live Independently | Assist in identifying appropriate sites under the City's zoning code. | 2/1/2015 | Ongoing. The City has a list of sites that it can provide to service providers. | Implemented. Continued Appropriateness: Remove. This is part of standard operating procedure, code implementation and standard business operations. |
| 7.3-2 Continue the Use of Federal Funding for Very Low- and Low-Income Senior and Handicapped Housing | Assist nonprofit developers to identify programs and provide technical assistance in obtaining funding. | 10/1/2021 | Ongoing. | No accomplishments. It is not clear that this has been accomplished, or that there there has been interest in this program. <u>The City has engaged in an on-call planning consulting contract that includes grant writing and application support.</u> Continued Appropriateness: Remove. |
| 7.3-3 Encourage Congregate Housing | Ensure City policies and zoning do not hinder such development. | 10/1/2021 | Ongoing. | No accomplishments. It is unclear if the zoning code would preclude this type of housing, or if modifications are necessary to implement this program. Continued Appropriateness: Remove <i>Unless mandated by state law.</i> |
| 7.3-4 Encourage Single-Room Occupancy Housing | Encourage the maintenance and development of single-room occupancy housing. | 10/1/2021 | Ongoing | No accomplishments. The program calls for identifying existing structures and sites, discussing with developers, and establishing incentives. It is not clear that these actions have been taken. Continued Appropriateness: Remove |

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| 7.3-5 Assist Nonprofits in Providing Emergency Shelter Services and Transitional Housing | Provide emergency shelter and transitional housing support. | 10/1/2021 | As a Participating Jurisdiction (PJ) in the County of San Bernardino's Urban County CDBG program, the City allocated funds to both Inland Temporary Homes and Family Services Association of Redlands for the purposes of preventing homelessness during this reporting period. | Implemented. Continued Appropriateness: Modify. See Program 1.2-1.2-1. Continued general support is part of standard operating procedure, code implementation and standard business operation. <u>In November 2021, the City approved a contract with two nonprofits to convert the Good Nite Inn, a motel, into a supportive housing facility.</u> |
| 7.3-6 Continue to Investigate Participation in the Permanent Housing for the Handicapped, Homeless (PHH) Program | Consider programs in Redlands. | 10/1/2021 | City will work with applicants if an application is received. Other outreach efforts have not taken place due to lack of staff resources. | No accomplishments. Continued Appropriateness: Remove. |
| 7.3-7 Promote Housing and Services for Persons with Developmental Disabilities | Inform families in Redlands about housing and services available for persons with developmental disabilities. | 2/1/2016 | Delayed due to lack of staff resources. | No accomplishments. <u>Implementation of this program was affected by staff turnover.</u> Continued Appropriateness: Remove |
| 7.3-8 Assess and Address the Housing Needs of Large Families and Overcrowded Households | Determine if overcrowding is being underreported and better assess conflicting information. | 8/1/2015 | Not completed due to lack of staff resources. | No accomplishments. <u>Implementation of this program was affected by staff turnover.</u> Continued Appropriateness: Remove |

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| 7.4-1 Update the Zoning Ordinance to Include Standards for Congregate Housing in Medium Density Areas Designated on the General Plan Diagram | Give more emphasis and greater point value to projects that include housing affordable to extremely low-, very low-, and low-income households. | 10/1/2015 | Delayed due to lack of staff resources. | No accomplishments. <u>Implementation of this program was affected by staff turnover.</u> Continued Appropriateness: Remove |
| 7.4-2 Continue Giving More Points to Affordable Development in the Residential Development Allocation Process | Give more emphasis and greater point value to projects that include housing affordable to extremely low-, very low-, and low-income households. | 10/1/2021 | Completed and ongoing. | The City continues to prioritize the point-based system to lower-income households <u>until the implementation on SB 330</u> . Note: SB 330 has invalidated the City's Residential Development Allocation process, both the limitation on annual permits and the competitive points process. Barring an extension by the state, the City's RDA process would resume in 2025 and is therefore still relevant to the 6 th Cycle Housing Element Update. Continued Appropriateness: Remove |
| 7.4-3 Evaluate Development Fees | Give more emphasis and greater point value to projects that include housing affordable to extremely low-, very low-, and low-income households. | 02/2015, ongoing, biennial basis. | Completed and ongoing. | The City continues to update the impact fees to reflect the current fair share cost of infrastructure and services. They were last updated in 2019. Continued Appropriateness: Modify. See Program 1.2-6 <u>1.2-6</u> and 1.2-14. The City should consistently evaluate the existing fees for fair share costs and consider ways for fees to be reduced. |
| 7.4-4 Participate in Establishment of Building Code | Help ensure unnecessary costs are not added while criteria are incorporated to assist those with special housing needs. | 10/1/2021 | Completed and ongoing. | The City has adopted the state code building code by reference. Continued Appropriateness: Remove This program can be removed unless the City makes any modifications to the code |

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| | | | | requirements for the purpose of making new housing construction more affordable. |
| 7.4-5 Continue One-Stop Permit Processing | Streamline the development process. | 10/1/2021 | Improvements/enhancements to the One-stop Permit Processing are evaluated annually as part of the budget process. | The City continues to use its one stop process. Continued Appropriateness: Remove This program represents typical business at the City, and could be combined with other programs that encourage permit streamlining. |
| 7.4-6 Maintain Current Planned Residential Development Standards | Allow flexible open space and setback standards. | 10/1/2021 | Ongoing. | Ongoing program; no accomplishments. Continued Appropriateness: Remove The process of maintaining and enforcing existing code requirements should not be considered a housing program. |
| 7.4-7 Continue to Allow Mixed Use Zoning | Provide additional incentives to create housing. | 2/1/2017 | Ongoing. | Staff is currently developing the Transit Villages Specific Plan, which will replace the Downtown Specific Plan. Continued Appropriateness: Combine Combine all programs involving the Transit Villages/Downtown area into a single program. Recommend identifying and listing the incentives referenced. See Programs 1.1-31-1-2 and 1.2-121-2-12. |
| 7.4-8 Mitigate Finance Costs for Low-Income Projects | Promote programs that reduce costs for low-income projects | 10/1/2021 | Ongoing. | No accomplishments. This program proved to vague to implement. This City is implementing multiple programs to reduce costs for housing development. |

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| | | | | Continued Appropriateness: Modify. See Programs 1.4-1.4-X, 1.5-10-1.5-10. |
| 7.4-9 Maintain a Large Supply of Available Sites to Maintain Competitive Land Costs | Ensure competition among landowners to help maintain lower land costs. | 10/1/2021 | Ongoing. | The City has maintained sites in excess of the RHNA requirement. Continued Appropriateness: Modify. The City is required by SB 166 to maintain sites in excess of the remaining RHNA requirement. The City has a no net loss program. See Program 1.1-5-1.1-4. |
| 7.4-10 Continue to Operate a Fast-Track Development Process | Reduce processing time by being flexible on submittal dates and overlapping processes. | 10/1/2021 | Ongoing. | Staff continues to implement this program. Continued Appropriateness: Remove. |
| 7.4-11 Evaluate and Revise Zoning Standards | Reflect current needs. | 10/1/2021 | Ongoing. Several amendments were approved in 2017 and 2018. | Several amendments were made to the code in the last cycle. Continued Appropriateness: Modify. City is implementing a suite of development constraint removal programs under Programs 1.2-1.2-X. |
| 7.4-12 Continue to Evaluate the Necessity of Amending the Zoning Code to Raise the Threshold of Multi-Family Dwelling Units for Establishing the Requirements of a Conditional Use Permit | Make sure the Conditional Use Permit (CUP) requirement does not cause a potential impediment to achieving housing goals. | 2/1/2016 | The City has evaluated this and has determined that the CUP requirement has not been an impediment to multi-family development. <u>The evaluation consisted of a review of all applications for Multi-Family projects. It was determined that projects that proceeded beyond the completeness review were</u> | This has been completed. Staff determined that the CUP requirement does not impede multi-family development. Continued Appropriateness: Modify. Addressed in Program 1.2-13-1.2-14 Remove CUP Requirement. |

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| | | | <u>unaffected by the requirement to obtain an CUP and were subsequently approved. No multi-family projects requiring a CUP were denied.</u> | |
| 7.4-13 Change Zoning Ordinance to Allow Group Homes of Six or Fewer Residents (Zoning Ordinance Change) | Amend the current zoning ordinance to reflect state law. | 2/1/2016 | In process. | Implemented. Continued Appropriateness: Modify. Program 1.2-5 1.2-5 will review standards for large group homes of 7 or more persons. |
| 7.4-14 Socio-Economic Cost-Benefit Study | Ensure socioeconomic cost-benefit studies (SECBS) are not used as a basis for denying a development project consistent with the General Plan and Zoning Ordinance. | 10/1/2021 | Ongoing. | Implemented. No projects have been denied on the basis of the SECBS studies. SECBS standards are objective. Continued Appropriateness: Modify. Program 1.2-8 1.2-8 will review and revise the SECBS standards for consistency with SB 330 regarding objective standards. |
| 7.5-1 Continue Community Development Block Grant (CDBG) Program | Be able to support a variety of programs supporting low- and moderate- income households and neighborhoods. | 10/1/2021 | During this reporting period the City was a Participating Jurisdiction (PJ) in the City of San Bernardino's Urban County CDBG and ESG Programs in order to continue supporting low- and moderate-income households and neighborhoods. | The County implements the program directly by setting CDBG funding priorities and creating an annual strategy. Continued Appropriateness: Modify. Program 1.5-10 1.5-10 promotes awareness of available funding. |

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| 7.5-2 Continue Adaptive Reuse of Single-Family Homes | Balance the need for more affordable housing and housing choice with the need to preserve Redland's traditional appearance and atmosphere. | 10/1/2021 | Ongoing. | Completed. RMC refers to the conversion of housing to commercial uses. Continued Appropriateness: Remove. |
| 7.5-3 Continue Condominium Conversion Ordinance | Prohibit condominium conversions unless City zoning and housing code standards are met. | 10/1/2021 | Ongoing. | No accomplishments. This is an existing code requirement <u>and staff continues to implement it.</u> Continued Appropriateness: Remove Chapter 17.25 of the RMC governs condominium conversions. The program essentially results in the enforcement of the existing ordinance, which is considered standard business and not a housing element program. |
| 7.5-4 Continue Senior and Handicapped Housing Grant Program | Use CDBG funding to provide repair grants to handicapped people. | <u>None identified</u> | Ongoing. | <u>Discontinued. This program falls under the category of Shelter/Transitional Housing in City records. A total of 168 individuals/households received Shelter/Transitional housing assistance from CDBG funds during the 5th Cycle. The City will review Housing Element programs in the 6th Cycle to build and prioritize a projects list that would be funded by CDBG.</u> Continued Appropriateness: Modify. Program 1.5-10 <u>1.5-10</u> promotes awareness of available funding. |
| 7.5-5 Continue CDBG Rental Rehabilitation Program | Provide CDBG loans with deferred repayment for rehabilitating rental units. | <u>None identified</u> | Ongoing. | Implemented. The CDBG implements and manages the CDBG funds for the City. City records have been obtained for CDBG expenditures during the 5th cycle. Assistance under the category of |

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| | | | | <u>Emergency Food/Rental Assistance was provided to a total of 2,442 individuals/households during the 5th cycle. See Program 1.5-10.</u> |
| 7.6-1 Buy-Out Assistance for HUD-Financed Projects | Help prevent below market rate units threatened with conversions to market rate. | 2/1/2016 | Ongoing. | <u>It is unclear from City records if this program was utilized. The City assisted 2,442 individuals/households with Emergency Food/Rental Assistance, and 169 individuals/households with Shelter/Transitional Housing. It is not known if program 7.6-1 is included in those statistics.</u> Continued Appropriateness: Modify. Program 1.5-10 1.5-10 promotes awareness of available funding |
| 7.6-2 Continue to Implement Regulations to Promote Mobile Homes | To retain existing mobile home parks and encourage new mobile home parks and subdivisions. | 10/1/2021 | Ongoing. | Implemented. RMC allows new mobile home parks. Continued Appropriateness: Modify. Continue to implement Program 1.5-9 1.5-9 Mobile Home Rent Control ordinance. |
| 7.7-1 Continue Fair Housing Counseling | Provide landlord-tenant mediation and fair housing counseling. | 10/1/2021 | The City is a Participating Jurisdiction (PJ) in the County of San Bernardino's Urban County CDBG, HOME, and ESG Programs. Landlord-tenant mediation and fair housing services are available to Redlands residents from the Inland Fair Housing and Mediation Board. | Implemented via County contract with the fair housing service provider, Inland Fair Housing Mediation Board. <u>City records indicate 403 households were assisted.</u> Continued Appropriateness: Continue Program 1.5-7 1.5-7 and 1.5-21 1.5-2 . |
| 7.7-2 Disseminate Fair Housing Information | Conduct public outreach. | 10/1/2021 | Fair housing and landlord-tenant mediation resource materials are available at a | Implemented. |

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| | | | variety of public counters at the City Hall, as well as at the A.K. Smiley Public Library, Senior and Recreation Centers, and City website. | Continued Appropriateness: Modify. See Programs 1.5-3 1.5-3 and 1.5-4. |
| 7.8-1 Implement Subdivision Ordinance | Continue subdivision map review to be consistent with 2002 ordinance requirements to reduce residential energy use. | 10/1/2021 | Ongoing. | This program reflects standard implementation of state law. Continued Appropriateness: Remove Recommend removal because this is a state requirement. |
| 7.8-2 Encourage Land-Use Patterns and Densities to Facilitate Energy Efficient Public Transit Systems in New Development Areas | Encourage land-use patterns and densities to facilitate energy-efficient public transit systems in new development areas. | 10/1/2021 | This planning concept was incorporated in the City's recent General Plan Update and implementation is in process. One example is the Transit Villages Specific Plan that the City is developing for the land areas surrounding three future train stations in the City. | This program was completed during the comprehensive General Plan Update. Continued Appropriateness: Remove |
| 7.8-3 Encourage Neighborhood Services Retention and Development | Reduce energy consumption and promote neighborhood identity. | 10/1/2021 | Ongoing. | It is unclear if the City has adopted revisions to its land use plans to facilitate and allow for neighborhood level commercial that is considered walkable. The General Plan does show that there are a few properties zoned for neighborhood commercial in single family areas. Continued Appropriateness: Remove. |

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| 7.8-4 Pursue Energy Efficient/Alternative Energy Funding | Increase efficiency and pursue alternative energy opportunities. | 10/1/2021 | Ongoing. The City participates with the California Enterprise Development Authority (CEDA) and the California Statewide Communities Development authority (CSCDA) and their affiliated financing partners in offering multiple programs for financing energy upgrades and improvements to commercial and residential property owners. | The City offers multiple programs for financing energy upgrades and improvements to commercial and residential property owners. Continued Appropriateness: Retain. See Program 1.7-31.7-3 |
| 7.9-1 Augment Density Bonus | To consider incentives beyond state law. | 8/1/2015 | Not completed due to lack of staff resources. | No accomplishments. Continued Appropriateness: Remove |
| 7.9-2 Evaluate Allowing Residential Uses in C-1 Neighborhood Stores and C-2 Neighborhood Convenience Centers District | Allow residential uses as a permitted use subject to a CUP in the C-1 and C-2 zones. | 2/1/2016 | Delay due to lack of staff resources. | No accomplishments. Continued Appropriateness: Modify. See Programs 1.2-121.2-12 and 1.2-131.2-13. |
| 7.9-3 Explore Mixed-Use Development Possibilities for Redlands Metrolink Stations | Amend the zoning code to add residential uses as a use permitted subject to a CUP in the C-1 and C-2 zones. | 2/1/2017 | In progress as part of the Transit Village Specific Plan project. | In progress. Continued Appropriateness: Modify. See Program 1.1-31.1-2. |
| 7.9-4 Evaluate Initiating a Ballot Measure to Allow Carryover of Unused Building Permit Allocations from Year to Year | Consider an amendment to Measure N. | 2/1/2017 | Not completed. | A referendum to modify portions of Measure N failed in the March 2020 primary. Continued Appropriateness: Remove |

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| 7.9-5 Continue Use of the Mills Act | Allow for agreements that provide for reduction in property taxes in exchange for continued preservation of a property. | 10/2021 | Ongoing. | Implemented. Continued Appropriateness: Remove. Not relevant to housing production goals and policies.. |
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7 AFFIRMATIVELY FURTHERING FAIR HOUSING

7.1 INTRODUCTION

Assembly Bill (AB) 686 requires Housing Elements to analyze any barriers in access to opportunity and to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing. AB 686 asks that a Housing Element describe population trends and how they may reveal fair housing issues, document trends regarding available housing itself such as year built or overcrowding, and describe improvement goals both for housing condition and for issues relating to fair housing in the population such as patterns of segregation.

~~AB 686 also requires that the Housing Element distribute sites identified to accommodate the lower-income RHNA in a manner that furthers fair housing and does not concentrate them in low-resource areas. For a complete assessment of the City's obligation to affirmatively further fair housing, an analysis of the RHNA sites and their impact on fair housing conditions is provided. RHNA sites are shown on a selection of maps by their income level. Additionally, a comparison of the RHNA units is provided against that of the whole City acreage. While this helps to illustrate fair housing patterns across the City, not all land in the City is suitable for additional housing such as slopes or high fire hazard areas. The sites inventory was developed to maximize opportunities for households of all income levels while recognizing and accounting for environmental constraints.~~

7.2 OUTREACH

7.2.1 Outreach Activities

The public participation program engaged community members and stakeholders using the following methods:

- Project website
- Social media postings
- Ads on the Redlands Daily Facts
- Online community survey (in English and Spanish)
- Stakeholder interviews
- Focused AFFH surveys to stakeholders and service providers
- Two virtual community workshops
- Two study sessions with the Planning Commission
- One study session with the City Council
- ~~Open-ended survey for service providers~~

The City experienced difficulty in obtaining responses from local stakeholders and service providers. Repeated calls and emails to the Inland Fair Housing Mediation Board (the County's contracted fair housing service provider that serves Redlands) over the course of many months provided limited information. Other local providers, including those that receive CDBG funding have yet to respond to the City's AFFH focus survey after three separate requests. However, open ended questions were included in the public housing needs survey to which the City received over 300 responses. Some of the respondents commented on discrimination or housing challenges experienced by themselves or people they know. This feedback was used in identifying issues in the community and the creation of the City's proposed Housing Programs.

City staff maintain a mailing list of individuals interested in the Housing Element Update to inform them of all outreach activities. Additionally, City staff continues to maintain a comprehensive Housing Element Update webpage, answer inquiries that arise regarding the housing element update, including participating in ongoing discussions with affordable housing developers who may be interested in pursuing projects in the City. The full summary of community engagement activities and outcomes of outreach and survey results are included in Appendix C.

The City provided a community update on revised housing draft before the Planning Commission hearing on December 14, 2021 and accepted public testimony. The draft element will be made public on December 21, 2021 prior to resubmitting to HCD and prior adoption by the City Council in February 2022.

7.2.2 Organizations Contacted and Consulted

- San Bernardino County Transportation Authority (SBCTA)
- Inland Fair Housing and Mediation Board
- California Department of Fair Employment and Housing
- Office of Fair Housing and Opportunity
- Redlands Unified School District
- San Bernardino County - Homeless Partnership Interagency Council on Homelessness
- Redlands Area Interfaith Council
- Northside Redlands Visioning Committee
- Family Services Association of Redlands
- East Valley Association of Realtors
- Building Industry Association
- Inland Housing Solutions
- Inland SoCal United Way

- University of Redlands Facilities Management
- Redlands Chamber of Commerce

7.2.3 Summary of Comments

Those who attended the community workshops described five of the most prominent issues pertaining to housing in the City as:

- Cost of housing
- Insufficient housing supply
- Homelessness
- Ability to purchase a home
- Proximity to jobs

The public requested transit accessibility and housing near rail stations, extending beyond the university. This desire for increased transit accessibility also made evident a desire for more density.

Industry stakeholders identified churches, malls, and the “donut hole¹⁹” as potential sources for infill and land to increase low-income and affordable housing. Density may require rezoning to multifamily residential or the use of unique housing accommodations like accessory dwelling units (ADUs). There is also a continued request for increased density near transit stops, as well as for housing to be built not just anywhere, but in underserved communities so people may continue to live in their community and not have to leave to gain access to affordable housing. Stakeholders had some concern with public perception of infill, but the public involved in the engagement opportunities agreed on the need for increased density to meet housing needs.

The respondents identified low-moderate income person(s), families with children under the age of 18, homeless persons, disabled persons, and people of color as the most vulnerable populations. The public also identified the following programs that they would consider most beneficial to the City:

- Permit streamlining.
 - The following programs improve permit streamlining:
 - 1.1-4 ~~1.1-3~~ By-Right Approval, 1.1-8 Development on Non-Vacant Sites; 1.1-9 Lot Consolidation and Small Site Development; 1.2-8 and 1.2-9 Ballot Measures; 1.2-10 Objective Design Standards; 1.2-12 Mixed-Use in Commercial Zones; 1.2-13 ~~Mixed Uses in Commercial Zones~~; ~~1.2-14~~ Remove CUP Requirement for Height; 1.2-14 Waive preapplication fee for affordable projects.

¹⁹ This refers to a well-known area within the City limits that is entirely unincorporated and under the land use authority of the County of San Bernardino.

- Preapproved ADU plans.
 - Programs 1.6-1 through 1.6-4 include pre-approved plans and other incentives.
- Inclusionary housing.
 - Program 1.3-2 addresses development of an inclusionary housing program.
- Reduced parking and landscape requirements.
 - Programs 1.1-9 and 1.2-7 addresses revisions to the parking standards.
- Financial resources such as down payment assistance and rental assistance.
 - Program 1.5-10 regarding notice of funding availability for non-profit housing development
- Placement of affordable housing near amenities (i.e., grocery stores, transit, community and emergency services).
 - Programs 1.1-1 RHNA Rezoning, 1.1-3 Transit Villages Specific Plan both recommend new high density and affordable housing in areas with excellent access to transit, services, public and private institutions, employment and existing and planned urban amenities.

A more in-depth summary of comments received is available in Appendix C.

7.2.4 Public Participation

The multifaceted community engagement process had meaningful input and guidance from a broad cross section of the Redlands community. This began with a new page on the City website detailing the Housing Element update, followed quickly by an online survey in both English and Spanish. One-on-one stakeholder interviews provided a venue for detailed and insightful discussion and recommendations from a broad spectrum of perspectives including service providers, building industry, housing advocacy groups, community service organizations, real estate agents, and educational institutions. These stakeholders also effectively drove constituents to the online survey. There were nearly 300 respondents to the online survey before the first virtual community workshop in April 2021. Survey respondents had high rates of completion of questions including housing needs, constraints, and recommended actions and programs. A second virtual community workshop was held in May 2021.

Due to the COVID-19 pandemic, the two community workshops were held virtually, which may have increased access for those who no longer had to commute to engage, but also may have caused a barrier to access for those with limited computer access or knowledge. To this end, the City provided toll-free call-in numbers for those who may not have ready access to a smart phone or computer. Workshops were hosted on weekdays at 6:00 p.m., which may have overlapped with work hours for some community participants. Concern about the rapidly spiking pandemic may have also overshadowed the Housing Element update. Another significant factor is the relative broad satisfaction and lack of concern over housing issues among the majority of Redlands residents. The vast majority of households in Redlands

own single-family homes, are not suffering significant housing burdens, and are therefore less likely to participate in workshops that do not affect their needs directly. This is evident in the nature of the comments received from participants in the workshops, survey, and stakeholder interviews.

Additionally, the City has performed regular social media postings to inform residents about the Housing Element. The City also maintains a mailing list of interested individuals. Members of the mailing list were notified prior to each community, Planning Commission or City Council meeting. The City has also been fielding questions about the Housing Element from the public and from affordable housing developers throughout the duration of the Housing Element Update process.

7.3 ASSESSMENT OF FAIR HOUSING

7.3.1 Fair Housing Enforcement and Outreach Capacity

The City of Redlands works with the nonprofit Inland Fair Housing and Mediation Board (IFHMB), which provides information, investigation, education, conciliation, and referral of housing discrimination complaints as it relates to fair housing. Enforcement comes overall, with assistance from IFHMB, from the national Office of Fair Housing and Opportunity (FHEO) and the California Department of Fair Employment and Housing (DFEH). The City refers all fair housing concerns to the IFHMB²⁰. There have been 17 total inquiries with 2 fair housing complaints forwarded to FHEO, 0 fair housing complaints forwarded to DFEH, and 0 fair housing complaints forwarded to IFHMB. Of the two complaints, one was on the basis of disability and one was on the basis of national origin. One case was not pursued further and the other was ruled to have no valid basis. Redlands' local fair housing agency, IFHMB, provides fair housing services, landlord/tenant and mobile home mediation, housing counseling, alternative dispute resolution, and senior services. Over the 5th cycle planning period, the agency responded to 127 complaints within the City of Redlands. Of these, 99 were on the basis of disability, 6 were each on the basis of race, sex, and familial status, 3 were on the basis of age and income, 2 were each on the basis of national origin or were arbitrary. The IFHMB conducted 292 engagements throughout the City during the 5th Cycle planning period.

The agency is available for contact by phone or email. In-person office visits are closed due to the COVID-19 pandemic. As of 2018, IFHMB employs 22 staff members who receive updated fair housing training on a quarterly basis with 5 staff members who are heavily trained on HCD AFFH requirements to maximize capacity to respond to fair housing needs. The IFHMB is funded by Community Development Block Grants, donations, and sponsors.

The City provides Fair Housing information on its website including information on the HOME Affordable Housing Program, Tenant-Based Housing Choice Voucher Program, Project-Based Voucher Program, Term-Limited Lease Assistance Program, and Home Ownership Assistance Program. The City provides contact information for the Housing Authority of San Bernardino County and contacts for emergency housing assistance.

The City's Police Department also periodically conducts Crime-Free Multi-Housing/Rental Property Training programs. This is an eight-hour course that focuses on education and reducing crime in apartments, condominium complexes, and single-family rental housing throughout the City by emphasizing communication with property managers, tenants, and police. Since 1995, the Redlands Police Department has participated in the San Bernardino County Crime-Free Multi-Housing program. The opportunity exists to integrate Fair Housing information into these trainings.

²⁰ The City of Redlands has made several attempts between May and August 2021 to obtain data from the IFHMB and has notified HCD of the difficulty in obtaining this data. The IFHMB has acknowledged the request, but no data has been transmitted at the time this AFFH appendix was authored.

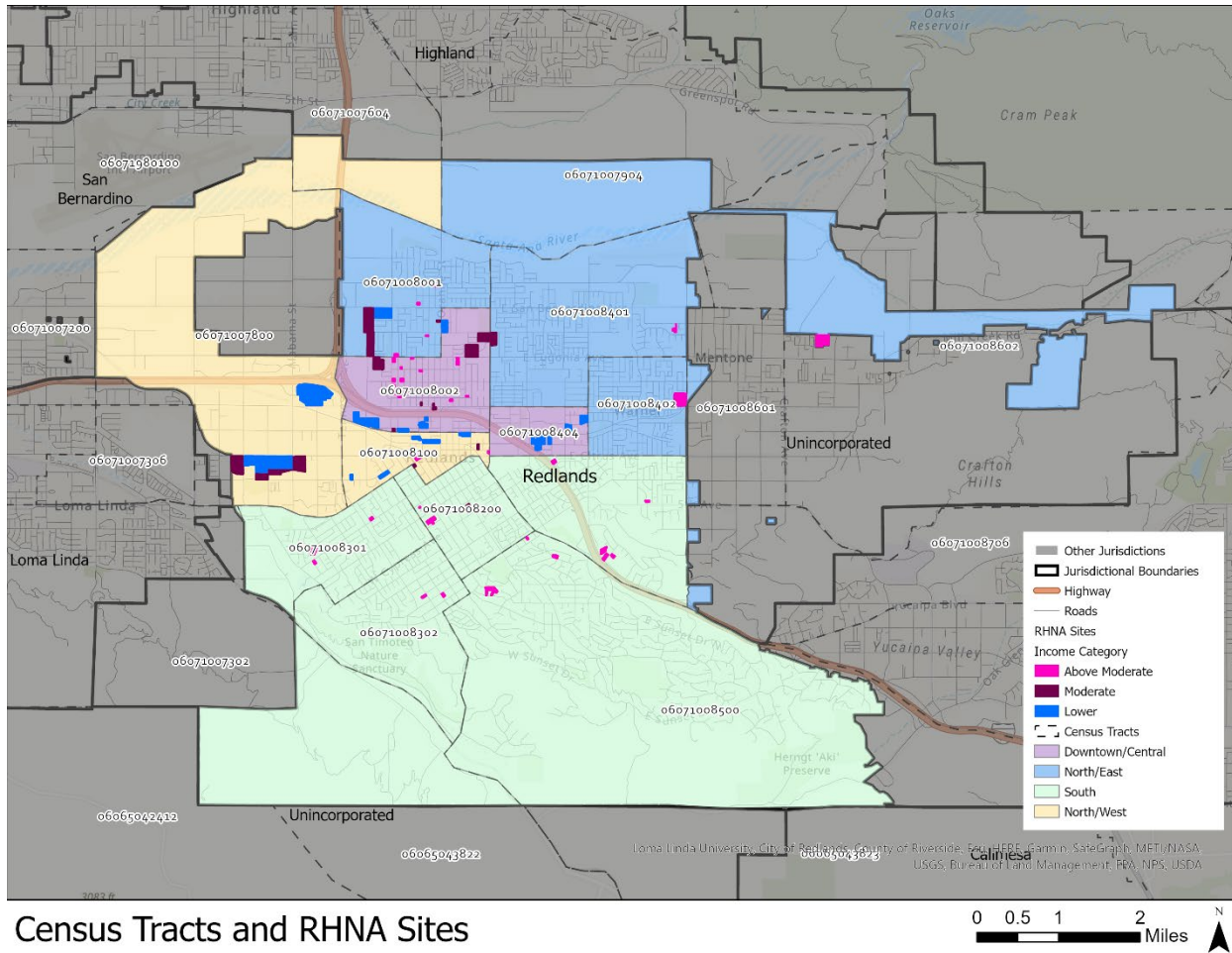
7.3.2 City and Sites Overview

~~Figure 7-1 Figure shows the census tracts in Redlands and divides the City into four geographic regions with similar trends for the purposes of the AFFH analysis. The accompanying Table 7-1 displays the census tracts and their given region. AB 686 also requires that the Housing Element distribute sites identified to accommodate the lower-income RHNA in a manner that furthers fair housing and does not concentrate them in low-resource areas. For a complete assessment of the City's obligation to affirmatively further fair housing, an analysis of the RHNA sites and their impact on fair housing conditions is provided. RHNA sites are shown on a selection of maps by their income level. Additionally, a comparison of the RHNA units by their income level is provided against that of the whole City acreage. Note that these bar graphs do not include pending projects. The City anticipates its above moderate RHNA units to be satisfied using entirely pending projects, so the bar graphs show the few additionally identified above moderate sites. This does cause a skew in the appearance of the graphs as they show all the identified moderate and lower income units. While this helps to illustrate fair housing patterns across the City, not all land in the City is suitable for additional housing. Specifically, much of south Redlands (generally, south of Highland Avenue) is located within and adjacent to a Very High Fire Hazard Severity Zone coupled with steep slopes (in excess of 15% cross slope) that are regulated by the Hillside Development District (This district is discussed in detail in Section 4.1). This area also lacks sidewalk infrastructure and public transportation connectivity due to the topographical constraints. such as areas with slopes or high fire hazard areas. This increased risk of fire hazards combined with poor mobility options results in this portion of south Redlands not being suitable for higher density development. Much of south Redlands are constrained by fire hazard zones and are not suitable for higher density development. The area of south Redlands north of Highland Avenue is generally flat terrain developed within a traditional street grid complete with sidewalks and some public transportation connectivity, particularly along Barton Road/Brookside Avenue/Citrus Avenue. The City has encouraged the adaptive reuse of large Victorian era homes in this area as apartment conversions through the application of the R-2 (Multi-family residential district) in the core of this northern portion of south Redlands.~~

~~The sites inventory was developed to maximize opportunities for households of all income levels while recognizing and accounting for environmental constraints. The City has prioritized sites in areas served by existing infrastructure, with access to employment centers such as Esri, the University of Redlands, public and private K-12 schools, Loma Linda University Medical Center and the industrial/warehouse district in northwest Redlands. As discussed in the Sites Inventory, RHNA sites can be analyzed in four general clusters, the TVSP Area, EVCSP Area, Tri-City Center Development, and other sites.~~

~~Figure 7-1 shows the census tracts in Redlands and divides the City into four geographic regions with similar trends for the purposes of the AFFH analysis. The accompanying Figure 7-1 displays the census tracts and their given region. A brief overview of geographic trends and sites within each geographic area are discussed in the breakdown below.~~

FIGURE 7-1: CENSUS TRACTS, RHNA SITES, AND CITY REGIONS



Source: American Community Survey 2019 5-Year Estimates

TABLE 7-1: CENSUS TRACTS AND CITY REGION

| Census Tract | Region |
|--------------|-------------------------|
| 6071007604 | North/West |
| 6071007800 | North/West |
| 6071008100 | North/West |
| 6071007302 | South (rural) |
| 6071008200 | South |
| 6071008301 | South |
| 6071008302 | South (hills) |
| 6071008403 | South |
| 6071008500 | South (hills) |
| 6071007904 | North/East (open space) |
| 6071008001 | North/East |
| 6071008401 | North/East |
| 6071008402 | North/East |
| 6071008601 | North/East |
| 6071008602 | North/East |
| 6071008706 | North/East |
| 6071008002 | Downtown/Central |
| 6071008404 | Downtown/Central |

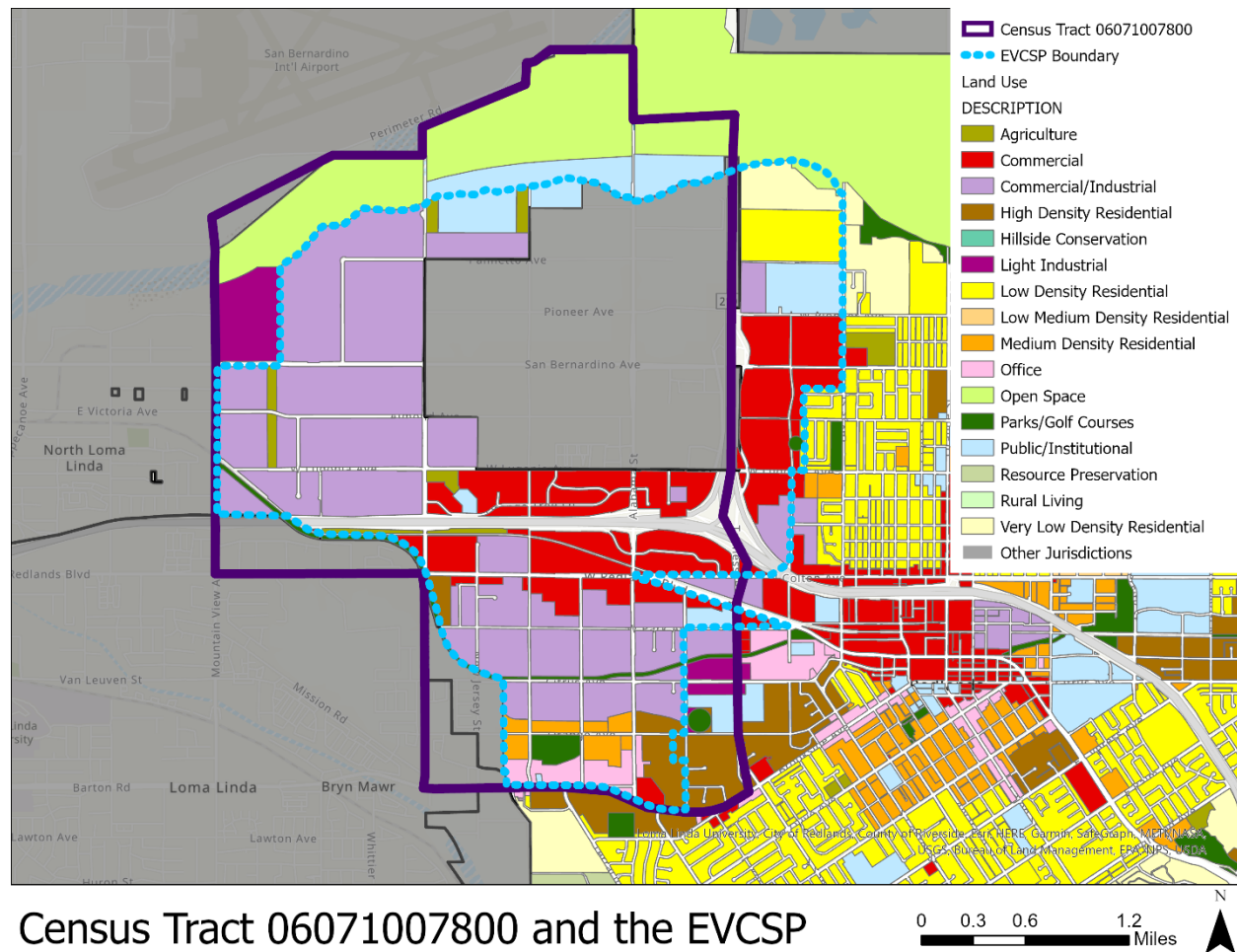
Source: American Community Survey 2019 5-Year Estimates

7.3.2.1 Northwest and Census Tract Outliers

The northwest area of the City includes three census tracts around the “donut hole” in the City. The “donut hole” is the unincorporated area surrounded by the City. This includes census tract 06071007800, which is shown in detail in [Figure 7-2](#). This large census tract covers the northwest corner of the City that repeatedly shows up in maps as an outlier. However, this tract is fully developed for warehouse and industrial uses to the north of Interstate 10. This tract also includes the western portion of the City, on the south side of I-10, where there are existing non-conforming single-family residences, several apartment complexes, townhomes, and small lot subdivisions. As there is little to no housing in significant portions of this census tract, mapped data may be skewed.

[The EVSCP consists of a large portion of this census tract and portions of the ones to the east. RHNA sites identified in this area are within the EVSCP. The sites are largely vacant, underutilized, or agricultural uses which are candidates for rezoning to accommodate capacity for low and moderate income sites. Sites in the EVSCP were selected due to their location near to regional job centers and the future Metrolink/Arrow light rail stations.](#)

FIGURE 7-2: CENSUS TRACT 06071007800 AND THE EVCS



Source: City of Redlands

7.3.2.2 South Redlands

The southern portion of the City is comprised of predominantly single-family homes and a significant amount of open space. Demographically this part of the City is 21-40% non-white. These tracts have many large lots and a significant amount in the southerly hills. Older neighborhoods to the south of downtown are more dense than hilly neighborhoods further to the south. This area has positive TCAC scores with a high number of higher-income, married family households. [There are some above moderate sites in south Redlands. Large portions of the area do not have access to adequate sewer and are located in a very high fire hazard zone. South Redlands has very few underutilized and appropriately-sized sites that meet state criteria for lower-income, multi-family residential RHNA sites. Program 1.6-1 is included to incentivize and encourage ADU and SB9 development within these areas.](#)

7.3.2.3 Downtown and Central North Redlands

The downtown/central area of the City includes the University of Redlands and the area of high segregation and poverty. ~~(see Figure and Figure)~~. The tract is highly developed but has poor TCAC scores and the highest number of adults living alone with no children. This area will benefit the most from the Transit Villages Specific Plan (TVSP) which covers 931 acres and is shown in Figure 7-3. Sites of all income levels are included in the TVSP area. The TVSP is an opportunity to increase regional access to transit and provide transit-oriented development within the plan area. The new transit opportunities connect the region to downtown Los Angeles and with the rest of the Los Angeles metropolitan area and serve as critical smart growth opportunities. It will provide significant investment to the areas that are lower resource in the City.

The City is already seeing developer interests in this area as a result of the rail stations nearing completion with the following projects having been submitted:

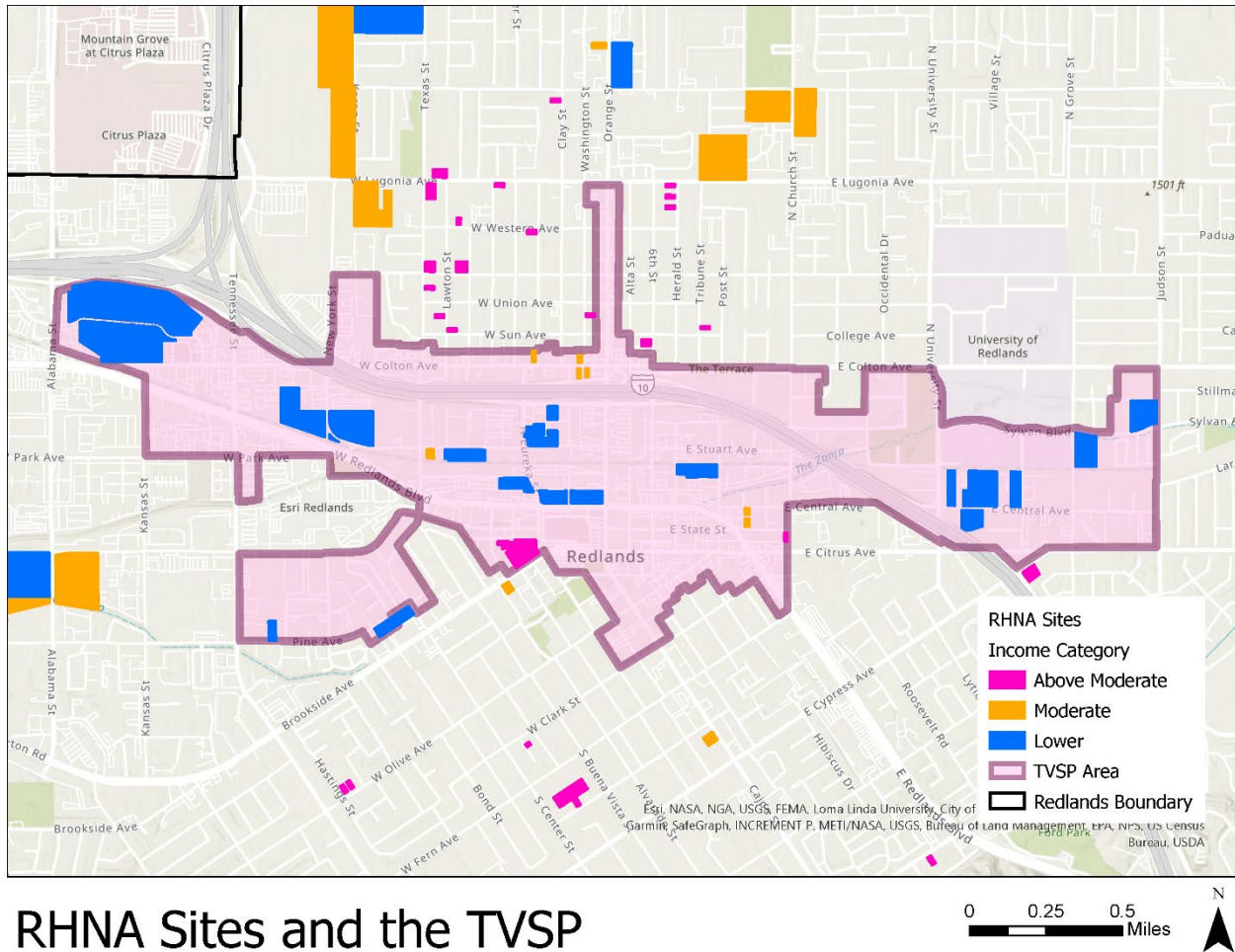
- **Redlands Mall Redevelopment:** A proposal to redevelop the Redlands Mall site on approximately 11.15 acres with a mixed-use project that includes residential and commercial uses within five new multi-tenant buildings, to include the following:
 - Demolish existing on-site buildings and improvements.
 - Construct five mixed-use buildings up to four (4) stories high.
 - Construct up to 681 multifamily dwelling units (apartments and condominiums), to include studio, one-bedroom, two-bedroom, and three-bedroom, and live/work units ranging between 475 and 1,500 square-feet each.
 - Construct a 6,000 square-foot recreational amenity building including pool.
 - Construct up to 73,000 square-feet of commercial floor area on ground floors to include retail and restaurant uses, as well as a rooftop restaurant.
 - Construct up to 12,222 square-feet of office space on upper floors.
 - Pedestrian plaza totaling approximately 22,742 square-feet on Third Street.
 - Construct a five-level above ground parking structure with 780 spaces.
 - Construct two subterranean parking garages.
 - Construct public and private open space areas to include landscaping, shade trees, street trees, and pedestrian improvements; and
 - Construct related site improvements to include sidewalks, driveways, landscape, lighting and streetlights, storm drains, flood prevention features, and public and private utility connections.
- **The Grand Apartments:** A proposal to:
 - Merge 14 existing parcels into one parcel, approximately 1.48 acres in size.
 - Construct a 149-unit multi-family apartment complex, with 25,964 square feet of common open space area.
 - Amendment to the existing Specific Plan to allow for height averaging, when determining the maximum building height, and amend the parking requirement for multi-family residential uses to 1 space per unit and 1 guest space for every 4 units.
- **City Center Apartments:** The project is a proposal to construct a mixed-use development consisting of a 138-unit apartment complex and three restaurant buildings. All three restaurant

pads are approximately 3,500 square feet in area and located in the southeast corner of the property. As proposed the apartments are four stories tall and constructed over two floors of parking. One floor of parking is below the ground surface.

In addition to the above proposed residential projects, the City has realized significant commercial and quality of life investments in the area surrounding the downtown rail station. The following projects have either been recently constructed, are under construction, or have received entitlement approval:

- **Redlands Food Hall:** The rehabilitation and adaptive reuse of the Mutual Orange Company Packing Plant to establish a multi-tenant food hall including food retail, farmer's market, restaurants, demonstration kitchen, and similar retail uses.
- **Escape Craft Brewery:** The rehabilitation and adaptive reuse of the City Transfer and Storage Company Warehouse to establish a locally owned and operated craft brewery and restaurant.
- **J. Riley Distillery:** The construction of a new restaurant building and adaptive reuse of a former auto repair shop into a distillery to house a locally owned and operated distiller.
- **Redlands Garage:** The construction of a 4-deck parking garage to service the Metrolink platform and nearby businesses. The parking garage includes a ground floor retail component, public art installations, common open space, and electric vehicle charging.
- **3rd Street North Retail Building:** Construction of a three-story retail/office building adjacent to the rail line and Redlands Garage. The building is connected to the garage by two pedestrian bridges on the second and third floors.
- **Santa Fe Depot and Old Chamber of Commerce Buildings:** The restoration of the Santa Fe Depot as the Arrow light rail downtown station. The adjacent Old Chamber of Commerce building is undergoing adaptive reuse as a food retail concept with outdoor common open space.
- **3rd Street South Retail Buildings:** Construction of two single story retail buildings adjacent to the rail line and the Santa Fe Depot as part of a transit oriented development concept.

FIGURE 7-3: TVSP AND RHNA SITES



RHNA Sites and the TVSP

Source: City of Redlands

7.3.2.4 Northeast Redlands

The northeast area is generally high resource and has similar trends to the south area of the City. It consists of mostly single-family homes that are slightly denser than the southern region, with some commercial nodes along primary corridors. [There is Program 1.6-1 is included to incentivize and encourage ADU and SB9 development within these areas. There is a large moderate income site and lower income site identified in the area. The northernmost portion of the City is open space and is constrained by the Redlands municipal airport. The area south of that contains a brand new, recently constructed subdivision, leading to increased incomes and housing prices in this area.](#)

7.3.2.5 Findings from 2020 Regional Analysis of Impediments to Fair Housing Choice

The City of Redlands participated in the San Bernardino County Analysis of Impediments to Fair Housing Choice (AI) for program years 2020-2025. The AI provides an analysis of the regional fair housing landscape focusing on four main issues of integration and segregation, areas of poverty, access to opportunity, and housing need. The AI process included significant public outreach across jurisdictions in San Bernardino County. As a result of the analysis, the AI identified five impediments to fair housing, their contributing factors and recommended actions to take to address them²¹. The housing impediments identified by the AI include:

- Disparate access to opportunity impacts people of color
 - Low school proficiency disproportionately impacts Black, Latino, and Native American Residents
- Insufficient affordable housing in areas of high opportunity disproportionately impacts protected classes
- Levels of residential segregation are increasing
- Community education on fair housing is a continuing need
- People with disabilities have limited housing options

7.3.3 Integration and Segregation Patterns

7.3.3.1 Race and Ethnicity

The City of Redlands has seen a growth in the overall non-White population, as the City has grown since the previous Housing Element cycle. Figure 7-4 ~~Figure~~ displays the racial and ethnic groups that make up the majority of the population by census tract. Most of the City is majority White by a slim or sizable gap, with the exception of three census tracts that have a non-White Hispanic majority. As the City is 32% non-White Hispanic, this indicates a concentration of the Hispanic population in the downtown census tracts. The tracts with a slim or sizeable gap that are majority Hispanic are located in the central and northern area of the City. These areas are identified in the City's 2035 General Plan Figure 1-3: Planning Subareas as Lugonia (area east of Highway 210) and West End (area west of Highway 210).

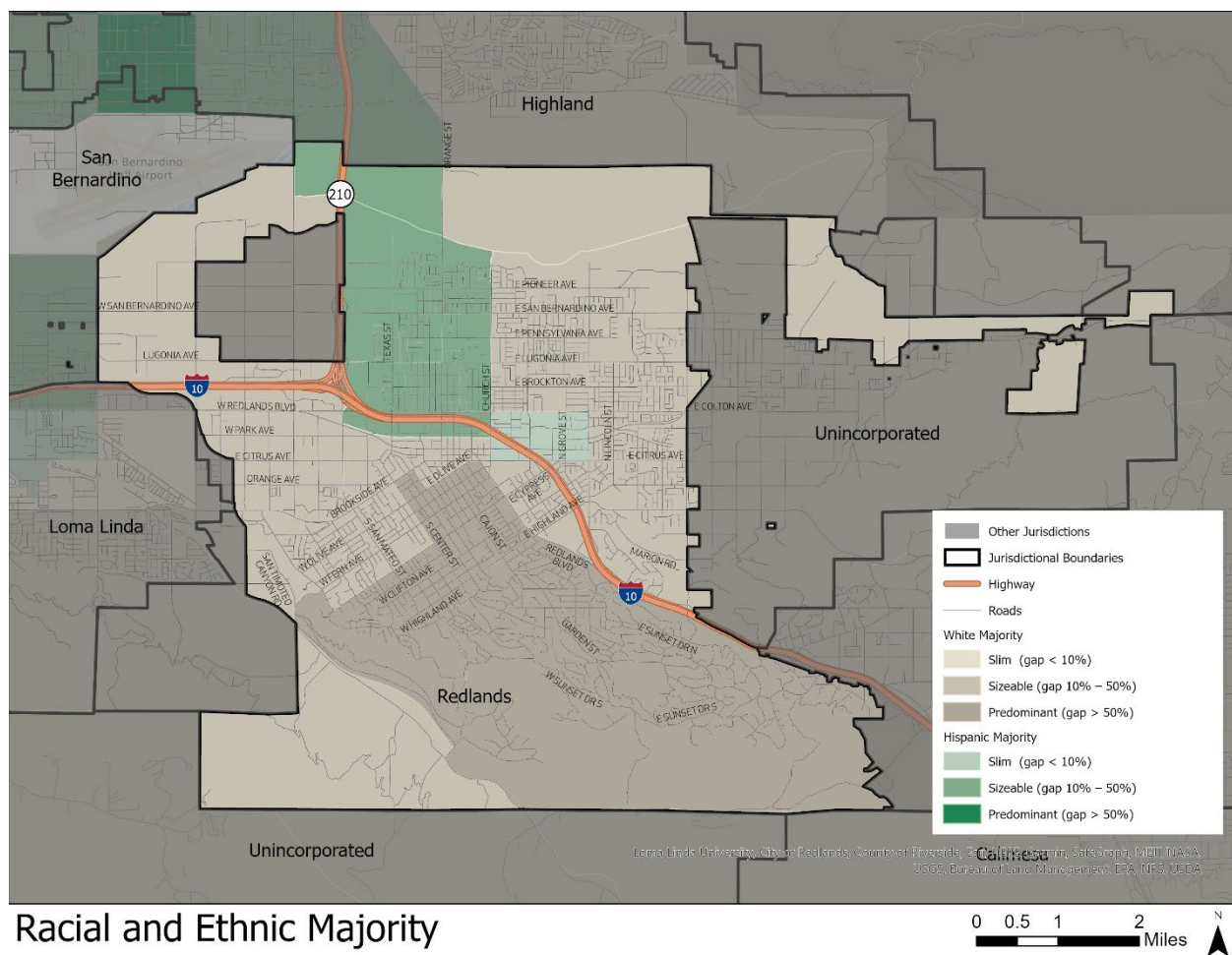
In the 1960s, the -central area that is now the downtown area of Redlands had the most racial diversity. Racial covenants maintained the south and east of the City as majority White. The southeast city still has a predominant white majority.

Regionally, most of San Bernardino County's population is heavily concentrated in the southwest corner of the jurisdictionCounty. While most of San Bernardinothe County has a majority non-Hispanic White population, the westernmost areas of the County have a similar profile to the City of Redlands with areas that have are majority non-White Hispanic majority-population clustered among the majority White

²¹ San Bernardino County Analysis of Impediments to Fair Housing Choice. Pg. 150.

areas. The County has seen a experienced growth in the overall non-White population. The distribution of the White and Hispanic populations throughout the Inland Empire is relatively even, while the High Desert and Morongo Basin have a whiter population. Redlands has a slightly lower non-White Hispanic population than the County, at 32 and 42 percent respectively. The AI found that changes in racial and ethnic composition across the County since 1990 have resulted in a more diverse but less integrated population countywide.²² The areas with the sizeable Hispanic population also have the most housing choice voucher use and a lower environmental opportunity score. Alternatively, predominantly white areas have higher incomes, education opportunity scores, and economic opportunity scores.

FIGURE 7-4: RACIAL AND ETHNIC MAJORITY, 2010, REDLANDS



Racial and Ethnic Majority

Source: HCD AFFH Mapping Tool.

Figure 7-5 shows the RHNA sites and the percentage of each census block group that is non-White. The figure shows that the minority populations have increased over time. There is no specific block group that saw a disproportionate increase in minority populations compared to others. The

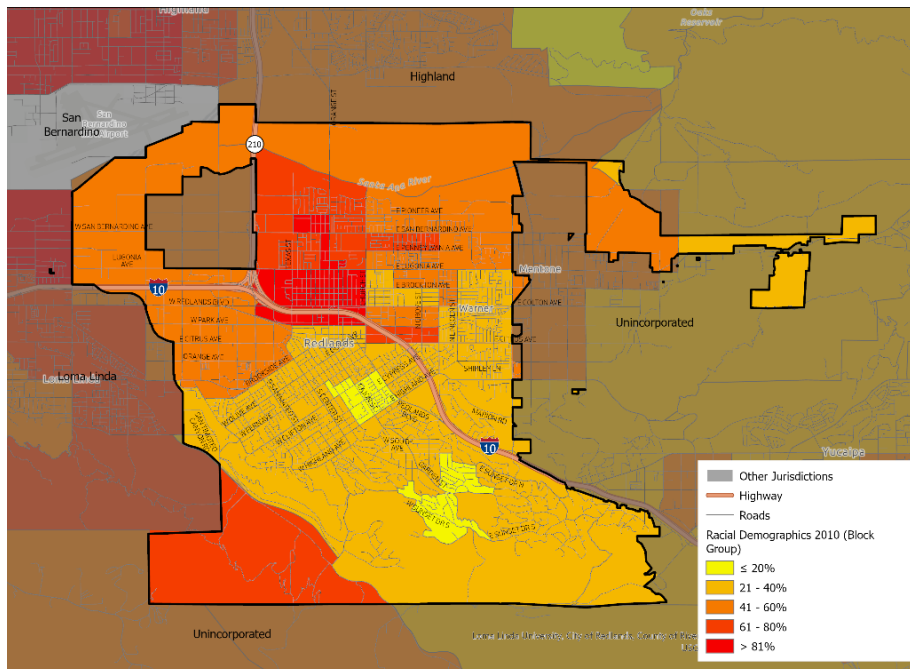
²² San Bernardino County Analysis of Impediments to Fair Housing Choice. Pg. 36

northern and western areas see higher concentrations of minorities than the eastern and southern parts of the City.

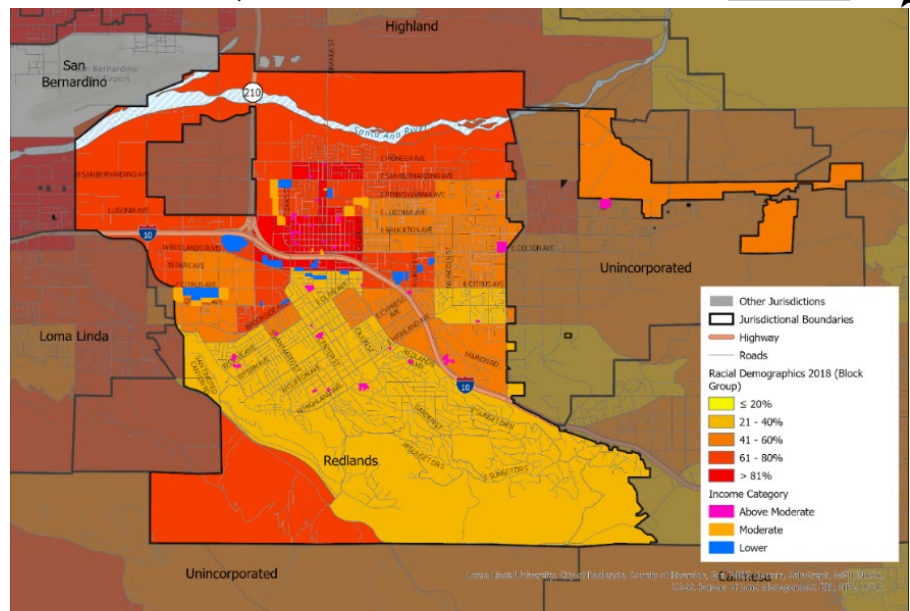
Trends in Redlands align with regional trends in San Bernardino County of increases in non-White populations. The 2020 San Bernardino County Analysis of Impediments to Fair Housing Choice reports that the Hispanic population in the County increased in population share by 20% in the last two decades.²³

RHNA sites are spread throughout the City and there are sites of each income level in areas with a higher minority concentration. The sites are focused in areas with the capacity and potential for growth.

²³ San Bernardino County Analysis of Impediments to Fair Housing Choice:
http://www.sbcounty.gov/uploads/cdh/reports/SanBernardinoCountyAI_Final_0410%20with%20Appendix.pdf.

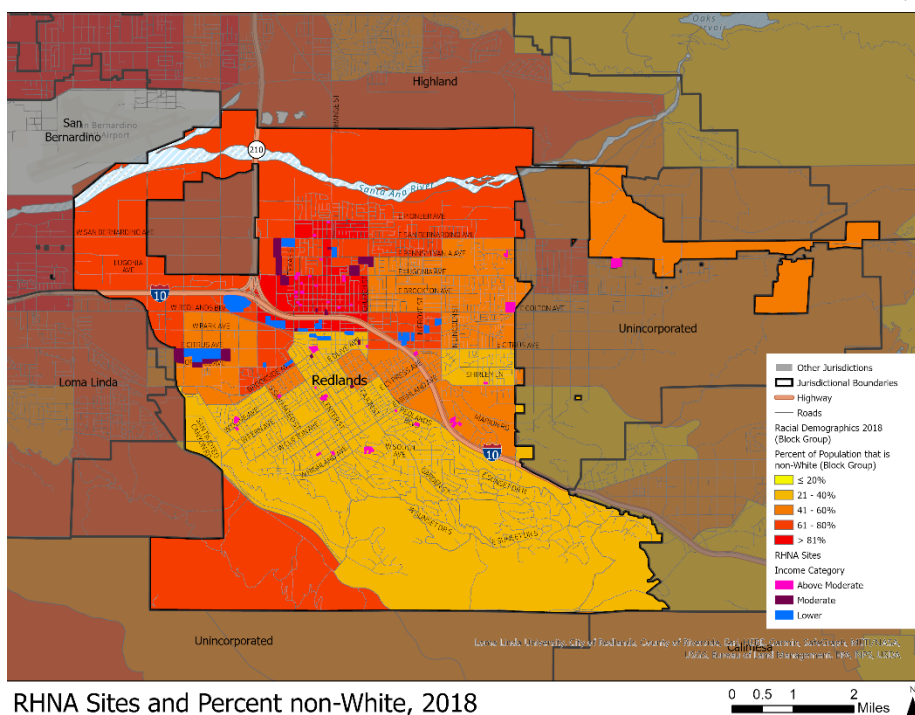
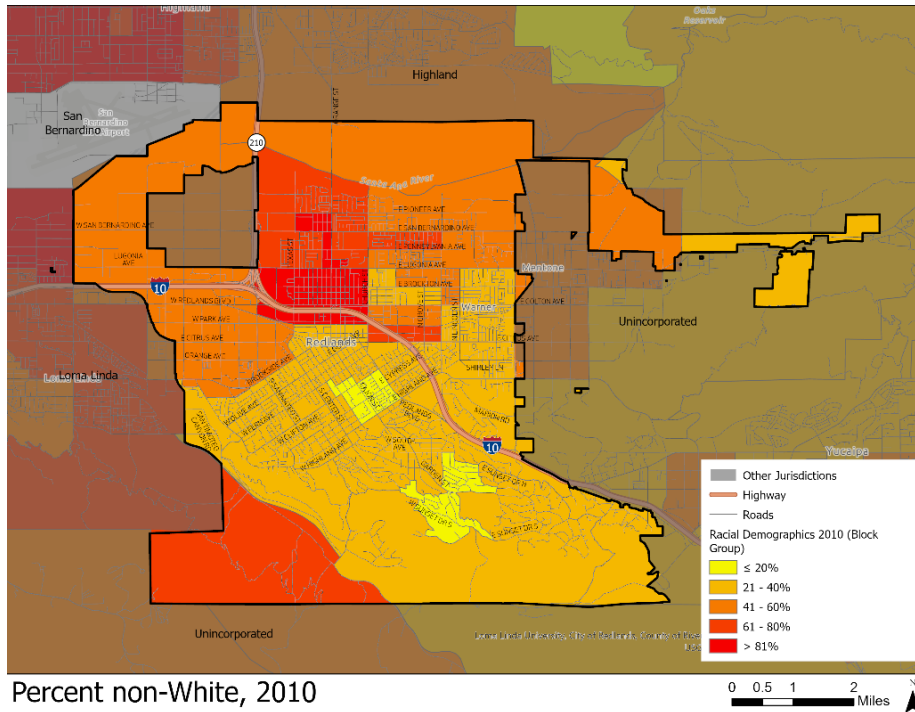


Percent non-White, 2010



RHNA Site Distribution and Percent non-White

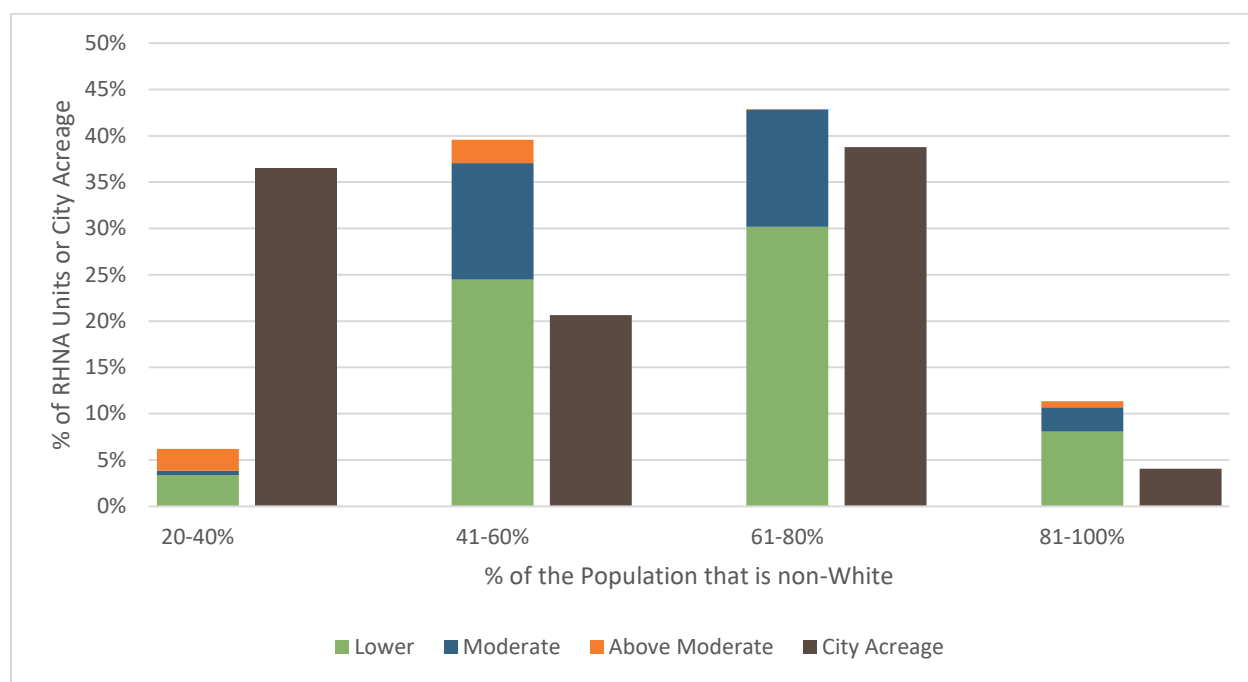
FIGURE 7-5: RHNA SITES AND NON-WHITE POPULATION (2010 AND 2018)



Source: HCD AFFH Mapping Tool.

The accompanying chart in Figure 7-6 displays the comparison of RHNA units by income level and the total City acreage that is in each quartile. The sites are generally dispersed by income level across categories. The lower income sites are not concentrated in any one category. 80% of RHNA units are in areas where there are 40% to 80% non-White populations. Currently, Redlands is 72% White and 32.7% of the population is Hispanic. While there is a disparity between sites and acreage in areas with 20-40 percent non-White population, large portions of this land are open space and not suitable for future development, including the 200-acre San Timoteo Nature Sanctuary and Herngt 'Aki' Preserve.

FIGURE 7-6: RHNA UNITS BY INCOME AND CITY ACREAGE COMPARISON BY NON-WHITE POPULATION



Source: HCD AFFH Mapping Tool and City of Redlands

One metric used to quantify segregation is the dissimilarity index. The dissimilarity index measures the distribution of two groups in a city and assigns a score between 1-100. Level of segregation is determined by assessing what percentage of residents of a census block would have to move for each block to have the exact same population of said group. The City's goal is a low dissimilarity index which indicates high integration. The formula for this calculation is provided by HCD's AFFH Guidance Document²⁴.

The categories for a dissimilarity index (shown as percentages) as defined by HCD are as follows:

- < 30: Low Segregation
- 30-60: Moderate Segregation
- > 60: High Segregation

²⁴ AFFH Guidance for All Public Entities, pg. 67

Table 7-2 shows the dissimilarity index between the White, non-Hispanic population and various minority populations in the City in 2013 and 2019. The table indicates that the dissimilarity index is decreasing or static over time except for the index for the Black, non-Hispanic and White non-Hispanic groups. This decrease in the segregation index for other populations is likely in part due to the increasing Hispanic population in the City. The index for the Non-White, non-Hispanic and Hispanic/White, non-Hispanic populations is 35. This is slightly lower than the index for San Bernardino County, which is at 40.

TABLE 7-27-3: DISSIMILARITY INDEX, RACE, 2013 AND 2019

| Group 1 / Group 2 | 2013 | 2019 |
|-------------------|------|------|
| Non-White/White | 39 | 35 |
| Hispanic/White | 43 | 39 |
| Black/White | 53 | 58 |
| Asian /White | 45 | 45 |

Source: American Community Survey 2013 and 2019 5-Year Estimates (B03002).

When comparing the Hispanic and White populations using the dissimilarity index, the result is a score of 39 in 2019, which is a moderate level of segregation. This result is explained by the existence of the high segregation and poverty neighborhood with a sizeable Hispanic majority in the northern area, as shown in Figure 7-4Figure. The sizeable Hispanic majority area continues beyond the City boundary into the area surrounding the San Bernardino Airport.

The indexes of dissimilarity for Black and White populations and Asian and White populations are 58 and 45, respectively. This equates to an upper moderate level of segregation between Black and White populations and a moderate level of segregation between the Asian and White populations. Redlands' Black and Asian populations respectively only make up 5.4% and 8% of the total population.

7.3.3.2 Income

In 2019, the Median Income in the City of Redlands was \$74,839. In 2019 the median income in San Bernardino County was \$63,362. While the median income for the City trends similarly to the County, the higher income southern tracts of Redlands skew the median income slightly higher than in the surrounding region. The housing choice voucher program is the federal program for assisting very low income, elderly, and disabled families and individuals in affording decent housing by subsidizing rent costs and paying landlords directly for a portion of the rent. Eligibility is based on family size and whether income is less than 50% of the area's median income.

Figure 7.3-6 reveals trends in where housing choice voucher recipients reside in the City of Redlands. The map reveals a concentration of housing choice voucher users north of downtown above I-10 with some use downtown and in the area of high segregation and poverty.

Housing choice vouchers make up a higher percentage of rental units in these areas as well, in addition to some presence in the southwest corner of the City. Higher use of vouchers in these areas is due to the availability of appropriate housing types like affordable rental units maintained by private owners. There are three housing developments partially managed by the Housing Authority of San Bernardino County that are located north of I-10: Redlands Housing Community, Vista Del Sol, and Valencia Grove. This relative concentration may explain the increased prevalence of housing choice voucher use in central Redlands.

The areas with little to no identified use of housing choice vouchers are predominantly single family homes. Countywide, similar trends are found where denser areas have more rental units and more housing choice voucher recipients.

Median Income, Block Group, 2015 - 2019

0 0.5 1 2 Miles

Figure 7-8 displays the RHNA sites by their income level and the percentage of residents in each census block group that falls into the low- and moderate-income category. The areas with the highest populations of low to moderate income have a variety of sites in each income category. The income groups in the City of Redlands are relatively segregated, with the lowest percentage of low- to moderate-income located in the southeast swath of the City, where there is a country club/ golf course, and high number of single-family homes. The sizes of homes and lot sizes in the south region tend to be larger than those in the north/east and downtown/central regions of the City, and the cost of housing in the south region tends to be higher compared to the north/east and downtown/central regions. The south region is also the same area that has a predominant White majority.

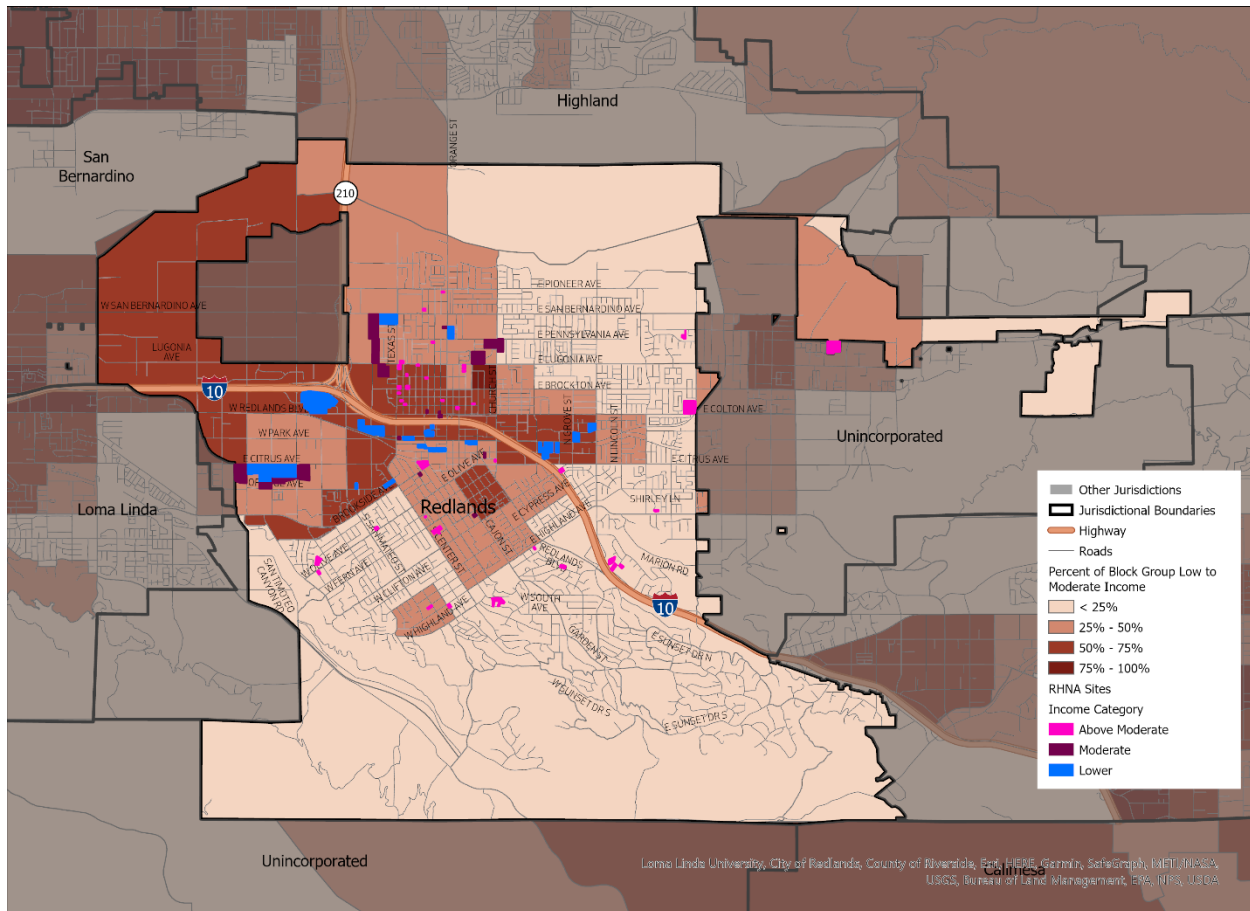
The area with the highest percentage of the population in the low- to moderate-income range is the census tract in the northwest corner (this tract is discussed in section [7.3.2](#) as an outlier), where there are also a number of agricultural jobs supporting Redlands' citrus industry, however, it is important to

note there are nearly no housing units in the area north and west the “donut hole” (unincorporated County pocket). There is some housing south of the donut hole, the only area in this tract zoned for residential use is south of I-10 on the western edge of the City.

The westernmost part of this upper corner has a slim White majority, but in the more central edge of the northwest corner the map shows an area of high segregation and poverty, where 50-75% of the population is in the low- to moderate-income range. This area’s income demographic is comparable to other areas in the City of San Bernardino, especially around the airport, but is ultimately relatively isolated compared to its surroundings. The area around the donut hole is almost exclusively industrial or commercial, with very few people living there. Therefore, the area surrounding the donut hole does not have a concentration of people as the map suggests.

The accompanying chart in Figure 7-9~~Figure~~ displays the percentage of RHNA units [by income level](#) compared to the City acreage by block group of the percentage that is low to moderate income. [The low and moderate income low- and moderate-income units are largely divided between the 25 – 50 and 51 – 75% categories. Many of the areas shown as < 25% low-moderate income are within the very high fire hazard severity zone or constrained by the Redlands Regional Airport.](#) Over 60% of RHNA units are in areas where 25%-50% of the population is low to moderate income.

FIGURE 7-8: RHNA SITES AND LOW-MODERATE INCOME POPULATION (2011-2015)



RHNA Sites and Low-Moderate Income

Source: HCD AFFH Mapping Tool.

FIGURE 7-9: RHNA UNITS AND CITY ACREAGE BY BLOCK GROUP COMPARISON BY LOW TO MODERATE INCOME

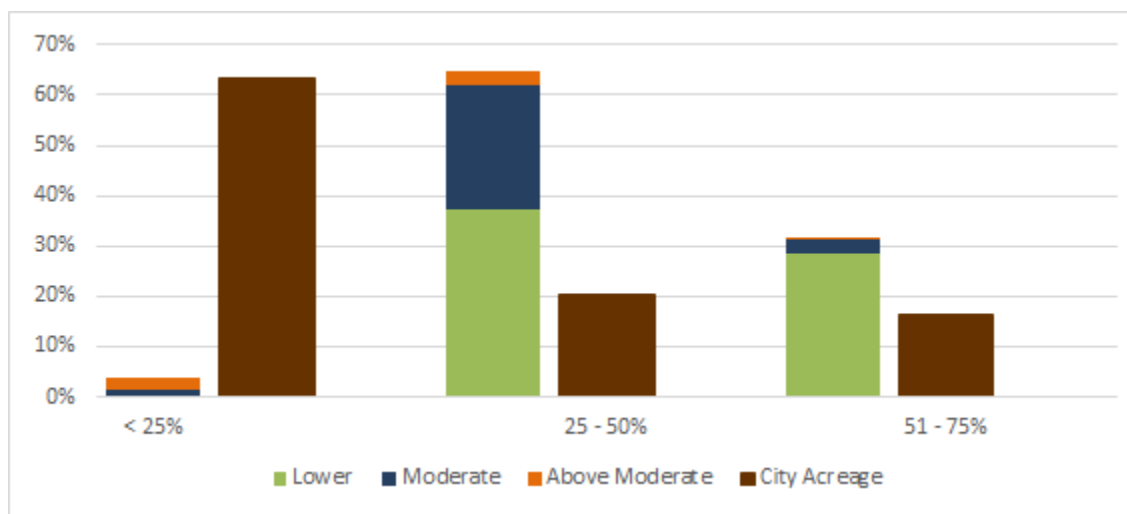
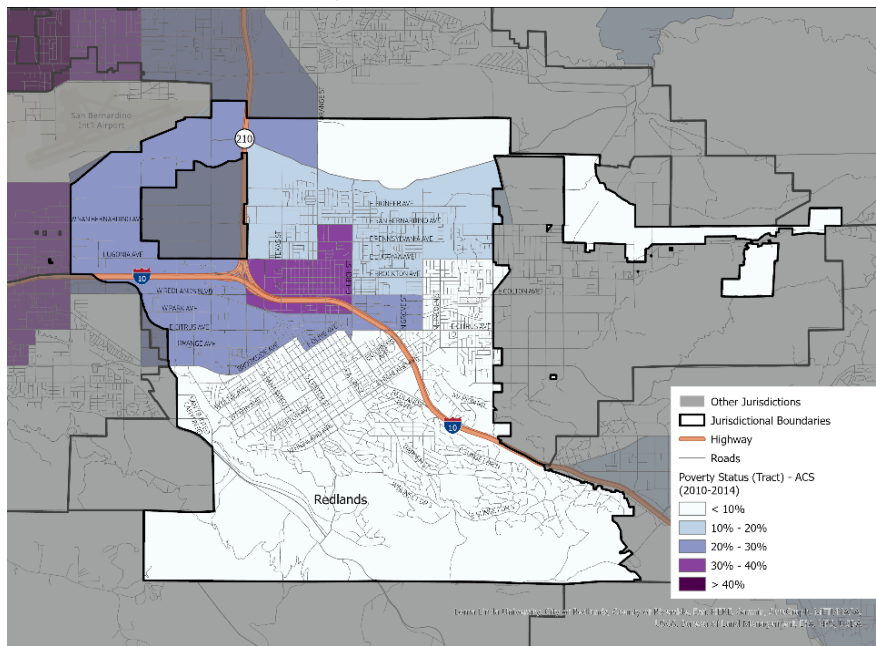


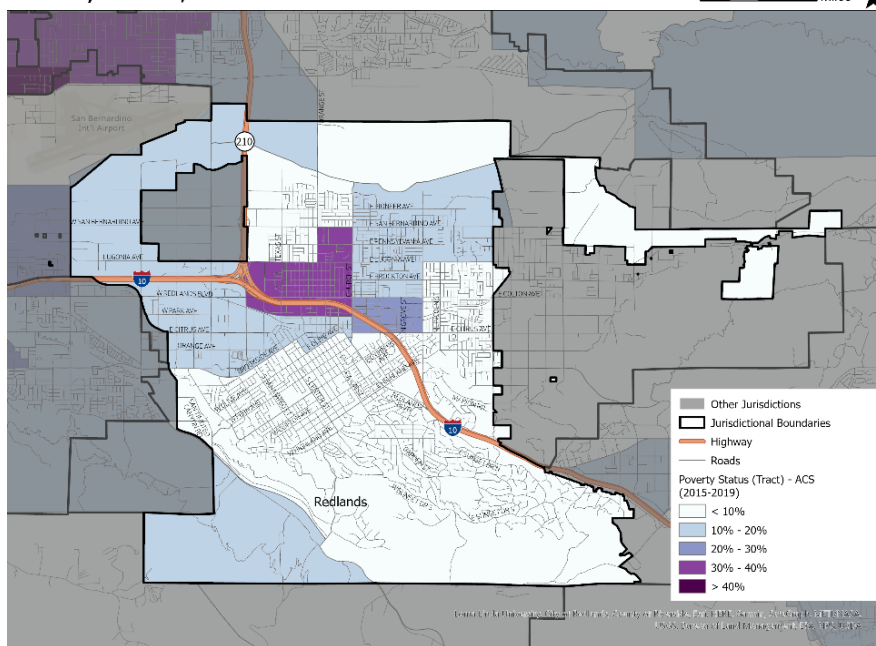
Figure 7-10 displays the percentage of households whose incomes are under the federal poverty level in each census tract from 2010-2014 and 2015-2019. Redlands has low levels of poverty throughout the City except in the central census tract, which has poverty levels from 30% to 40%. In San Bernardino County, 13.3% of the population is below the poverty line. The change over time shows that poverty in the western and north-central census tracts has decreased, while the rest of the City mostly stayed in the same category. Using the dissimilarity index to compare low- to moderate-level incomes with above-moderate incomes in the City yields a result of 41. This level of segregation is likely due to the divide between the southern and northern halves of the City. The southern half of the City has a high-income population with less than 25 percent of residents falling in the low to moderate income category. This area also contains hillside preservation areas and other conserved largely open space and single-family homes. The northern half of the City varies in income level, with some downtown areas reaching 50 to 75 percent of the population being in the low to moderate income category. This area surrounds downtown and the university. The difference in demographics between the north and south contributes to the income dissimilarity index of 41. This indicates a moderate level of segregation among high- and low-income levels in Redlands. The dissimilarity index comparing low- to moderate-income with above-moderate income in the County yields 21.7, indicating a low segregation of incomes and revealing Redlands' higher levels of income segregation compared to the region as a whole. The presence of the University of Redlands likely provides an explanation for much of the lower-income clustering in these tracts. Many university students are not employed full time or are employed in lower-paying jobs; the high concentration of university students is a reason that these tracts have more low-moderate households. Additionally, areas around the university have a zoning designation of R-1-D (Single Family Residential). This designation permits lots of a certain depth to have two primary residences, however because of lot configuration, these units tend to be smaller than typical primary residences.

While increasing lower income housing in the southern areas of the City would lower the dissimilarity index, the southern, suburban area of the City is not the most accessible place for low income or affordable housing to be. There is a lack of transit in this area, and the suburban neighborhoods make the development of low-income housing difficult and expensive.

FIGURE 7-10: POVERTY STATUS, 2010-2014 AND 2015-2019



Poverty Status, 2010-2014



Poverty Status, 2015-2019

Source: HCD AFFH Mapping Tool.

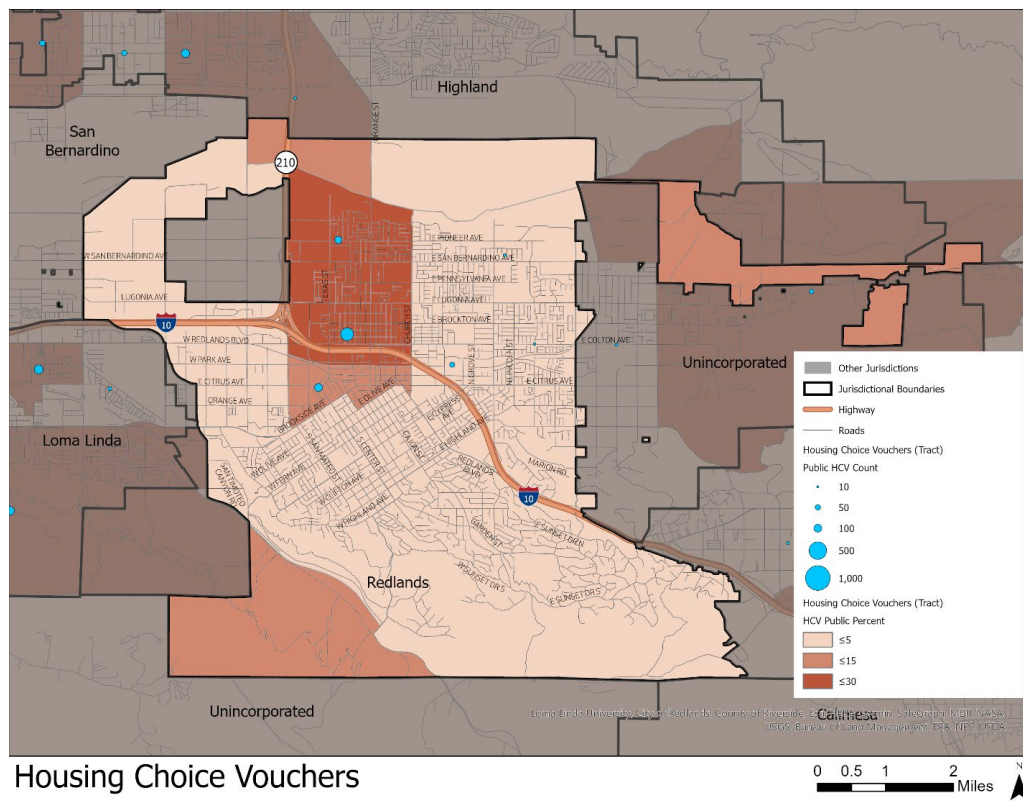
The housing choice voucher program is the federal program for assisting very low-income, elderly, and disabled families and individuals in affording decent housing by subsidizing rent costs and paying landlords directly for a portion of the rent. Eligibility is based on family size and whether income is less than 50% of the area's median income.

Figure 7-11 reveals trends in where housing choice voucher recipients reside in the City of Redlands. The map reveals a concentration of housing choice voucher users north of downtown above I-10 with some use downtown and in the area of high segregation and poverty.

Housing choice vouchers make up a higher percentage of rental units in these areas as well, in addition to some presence in the southwest corner of the City. Higher use of vouchers in these areas is due to the availability of appropriate housing types like affordable rental units maintained by private owners. There are three housing developments partially managed by the Housing Authority of San Bernardino County that are located north of I-10: Redlands Housing Community, Vista Del Sol, and Valencia Grove. This relative concentration may explain the increased prevalence of housing choice voucher use in central Redlands.

The areas with little to no identified use of housing choice vouchers are predominantly single-family homes. Countywide, similar trends are found where denser areas have more rental units and more housing choice voucher recipients.

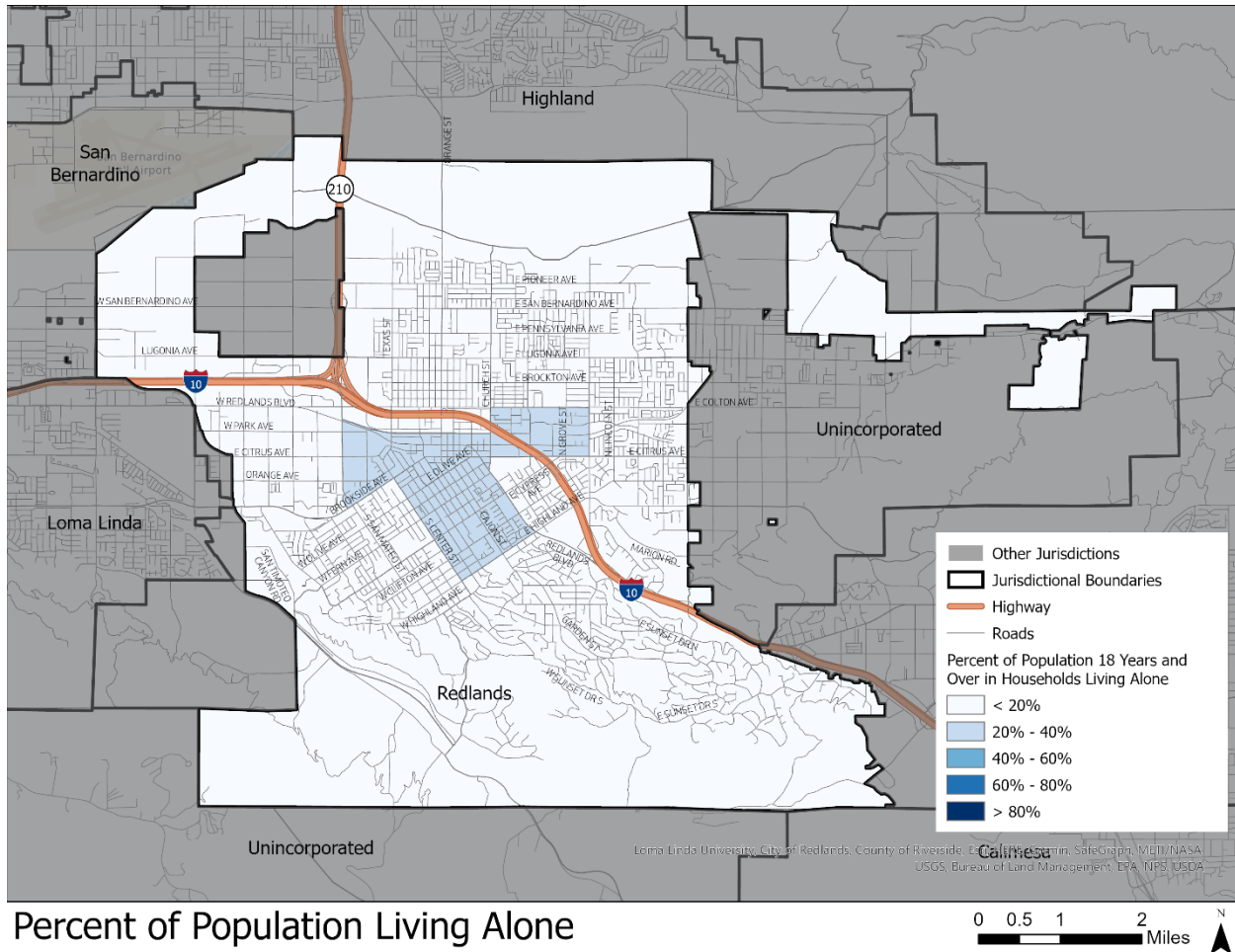
FIGURE 7-11: LOCATION OF HOUSING CHOICE VOUCHERS, 2010, REDLANDS



7.3.3.3 Familial Status

In a large majority of the City, less than 20% of the adult population lives alone, except in the downtown City center hub as well as the University of Redlands, where students may be living in atypical housing, and where 20%-40% of adults live alone, as shown in Figure . Regional trends indicate similar levels of the population living alone across neighboring jurisdictions and the entirety of San Bernardino County.

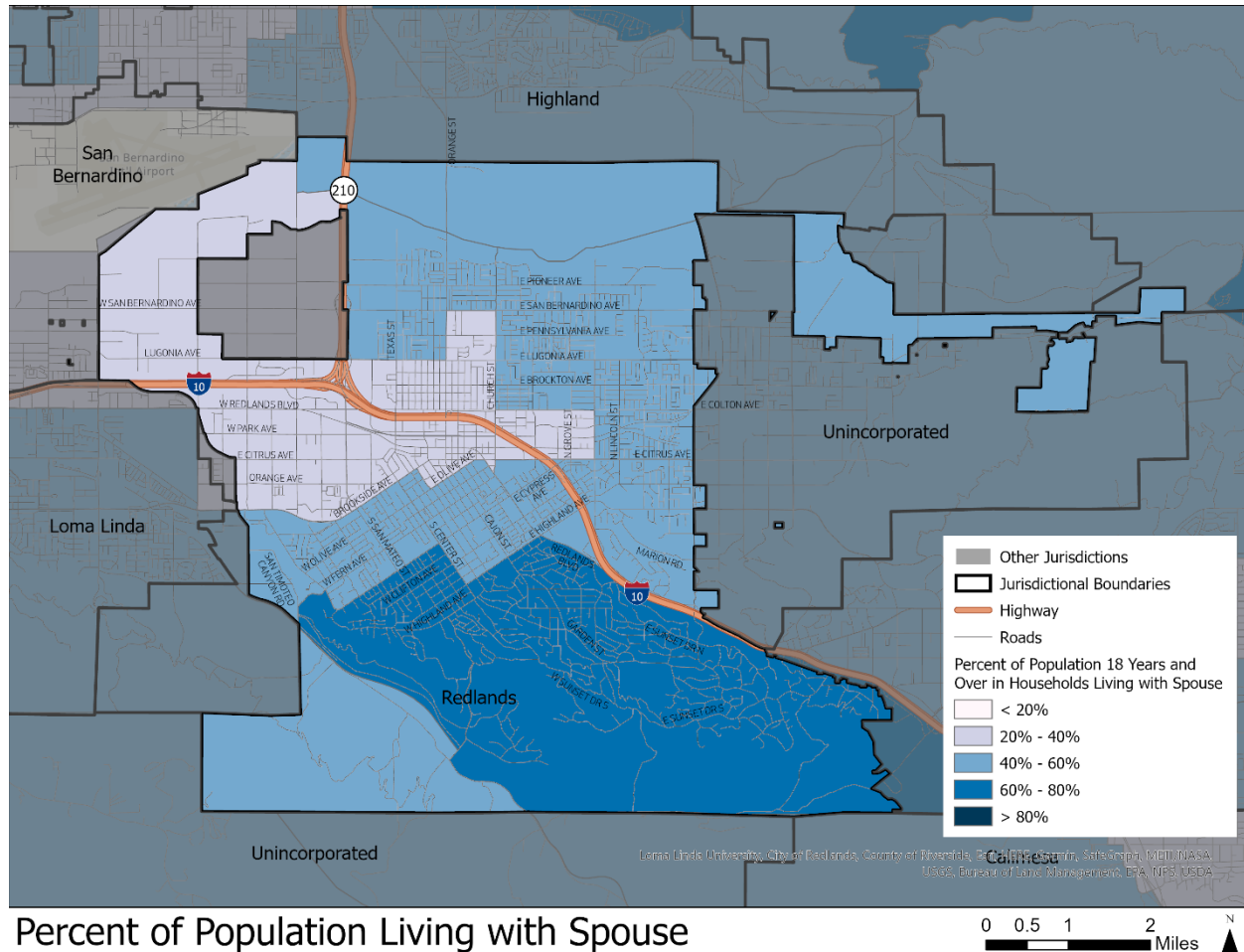
FIGURE 7-12: PERCENTAGE OF ADULTS LIVING ALONE, 2015-2019 REDLANDS



Source: HCD AFFH Mapping Tool.

The area where a larger percentage of the population lives alone is also, as expected, the area where the lowest percentage of adult residents lives with a spouse, as shown in Figure 7-13Figure.

FIGURE 7-13: PERCENTAGE OF ADULTS LIVING WITH SPOUSE, 2015-2019, REDLANDS



Source: HCD AFFH Mapping Tool.

The area with the highest percentage of the population living with a spouse corresponds with the wealthiest corner of the City, the southeast corner. There are also more children living with married couples in that southeast portion of the City, as shown in Figure 7-14. This area is farther from downtown, is lower density, and features mostly single-family residential homes.

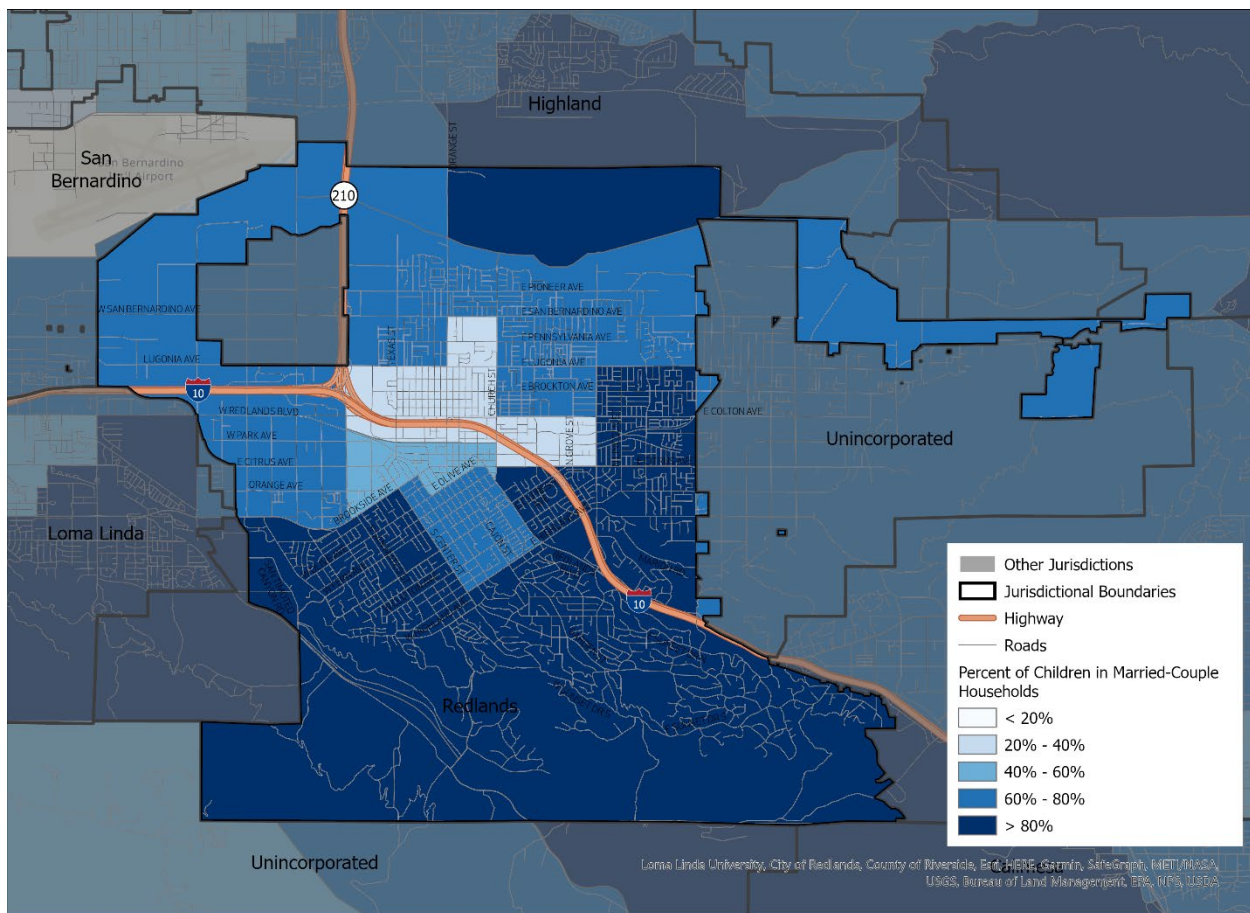
Compared to the region as a whole, the majority of the City matches trends in surrounding cities where in the majority of the area about 40-60% of adults live with a spouse, with some sparse neighborhoods where under 40% live with a spouse. The southeast portion of Redlands stands out in this regard—at over 60% of adults living with a spouse, it is comparatively high.

Figure 7-14 displays the percentage of children that are living in married couple households in each census tract. The area with the highest percentage of children in married-couple households correlates with the highest percentage of spouses living in the same household. The areas surrounding the university and downtown have few individuals under 18 years of age, just as they had a low number of spouses living together and a high number of people living alone. The discrepancy in the trends that these data sets

reveal is that the northwest corner of the City has a low percentage of spouses living together, but a higher percentage of spouses with children that live together, as shown by Figure 7-14^{Figure}. This means that spouses living together in other areas are less likely to have children than those spouse couples in the northwest corner. Although there are few spouses living together in the northwest corner, the few that do are highly likely to be living with children.

Regionally, trends shown in Figure continue beyond the bounds of the City, with Loma Linda and Highland having the highest percentage of children in married couple households, matching the adjacent areas of Redlands.

FIGURE 7-14: PERCENTAGE OF CHILDREN IN MARRIED-COUPLE HOUSEHOLDS, 2015-2019, REDLANDS

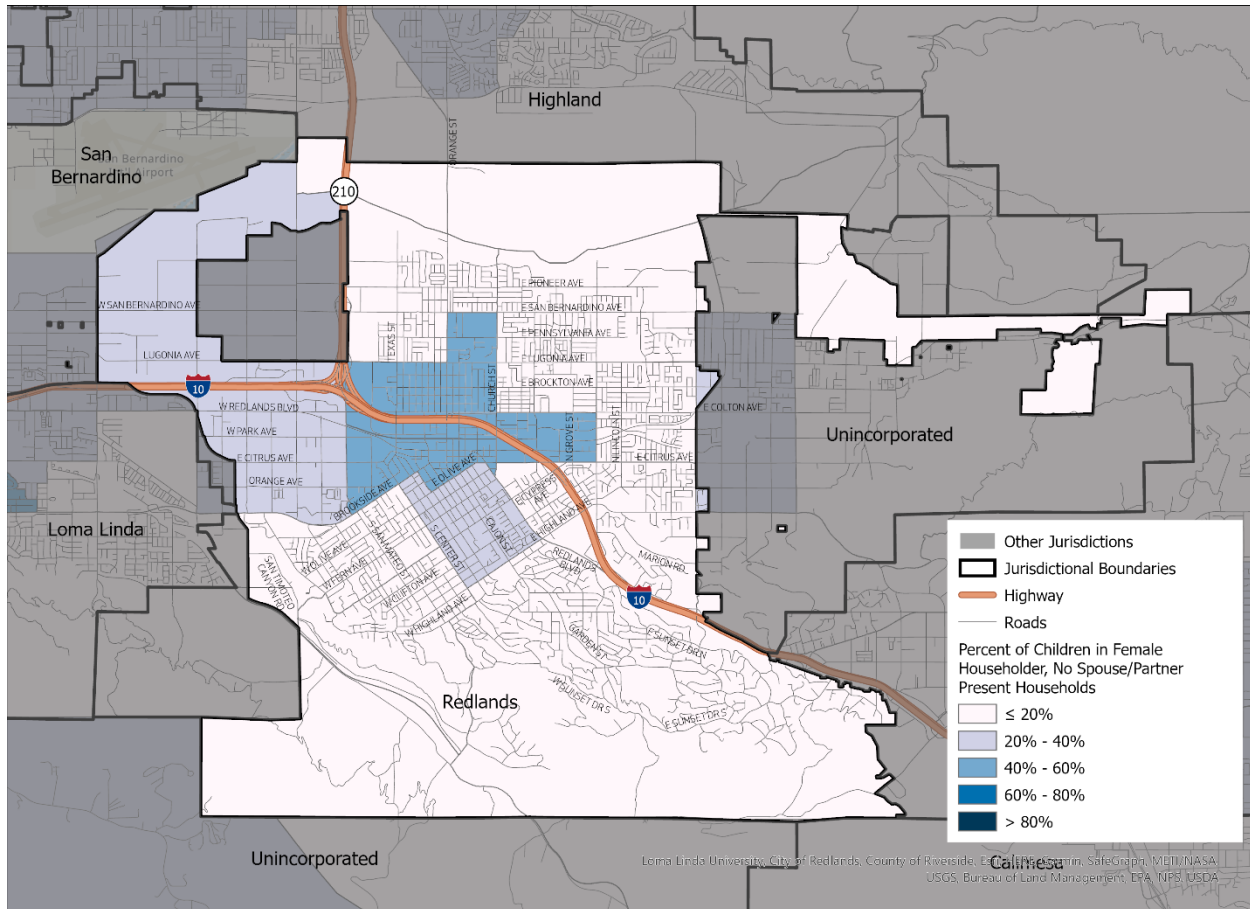


Children in Married Couple Households

Source: HCD AFFH Mapping Tool.

Throughout the City, there are very few female-headed households with children, as revealed by Figure 7-15^{Figure}. Exceptions include the central portion of the City which sees from 40% to 60% of children in female-headed households and one tract just below the central tracts (06071008002). There are two census tracts with 20% to 40% of children in female-headed households.

FIGURE 7-15: PERCENTAGE OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS, 2015-2019, REDLANDS



Children in Female-Headed Households

Source: HCD AFFH Mapping Tool.

7.3.3.4 Persons with Disabilities

The U.S. Census defines a person with disabilities as someone who reports as having a hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty. Approximately 12% of the population in the City of Redlands has a disability, and 48% of the disabled population has an ambulatory, or walking, difficulty.

Compared to other characteristics of disabilities, such as a hearing or vision difficulty, a walking difficulty can pose a need for specialized housing, such as a single-story unit or immediate adjacency to transit—a need that may increase with a larger population. Additional adaptations, depending on level of mobility, may include wheelchair access, larger homes for live-in help, or proximity to health facilities.

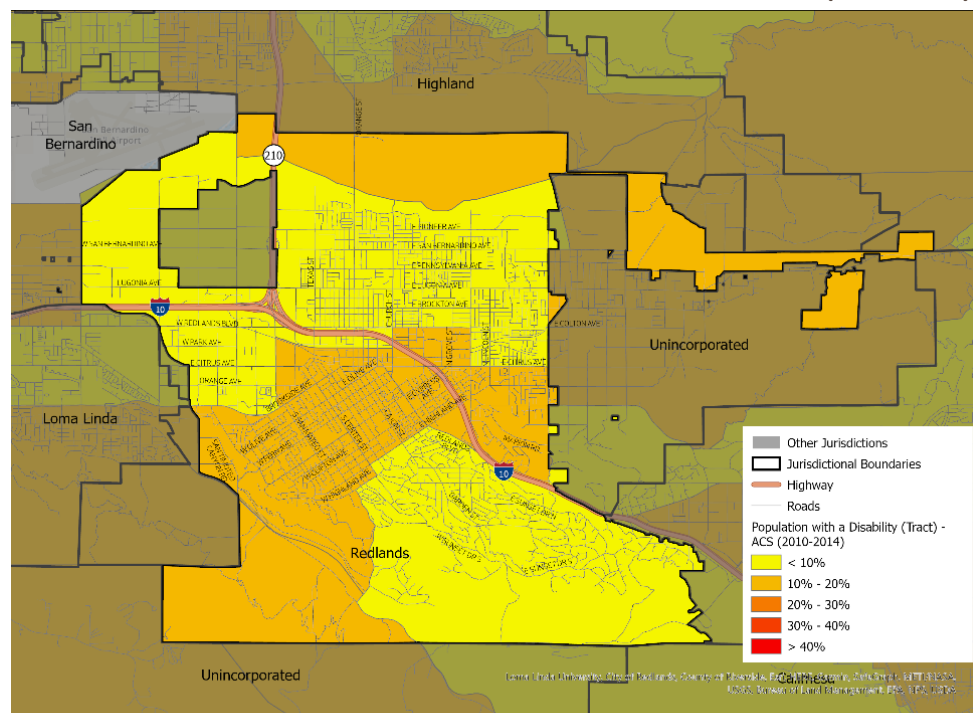
TABLE 7-37-4: DISABILITY CHARACTERISTICS

| Characteristic | 2010 | 2019 | % Change |
|--|-------|-------|----------|
| Persons with Disability | 7,184 | 8,235 | 15% |
| Percentage of Population with Disability | 10.49 | 11.66 | |
| Disability Type by Age Group: | | | |
| Hearing Difficulty | 2,018 | 2,623 | 30% |
| Under 18 Years | 113 | 97 | -14% |
| 18 to 64 Years | 523 | 757 | 45% |
| 65 Years and Older | 1,382 | 1,769 | 28% |
| Vision Difficulty | 1,453 | 1,046 | -28% |
| Under 18 Years | 164 | 28 | -83% |
| 18 to 64 Years | 606 | 684 | 13% |
| 65 Years and Older | 683 | 334 | -51% |
| Cognitive Disability | 2,579 | 3,529 | 37% |
| Under 18 Years | 360 | 429 | 19% |
| 18 to 64 Years | 1,385 | 1,994 | 44% |
| 65 Years and Older | 834 | 1,106 | 33% |
| Ambulatory Difficulty | 3,684 | 3,924 | 7% |
| Under 18 Years | 88 | 38 | -57% |
| 18 to 64 Years | 1,570 | 1,586 | 1% |
| 65 Years and Older | 2,026 | 2,300 | 14% |
| Self-Care Difficulty | 1,454 | 1,736 | 19% |
| Under 18 Years | 109 | 152 | 39% |
| 18 to 64 Years | 617 | 690 | 12% |
| 65 Years and Older | 728 | 894 | 23% |
| Independent Living Difficulty | 2,987 | 3,508 | 17% |
| Under 18 Years | - | - | - |
| 18 to 64 Years | 1,367 | 1,815 | 33% |
| 65 Years and Older | 1,620 | 1,693 | 5% |

Source: American Community Survey 2010 and 2019 5-Year Estimates.

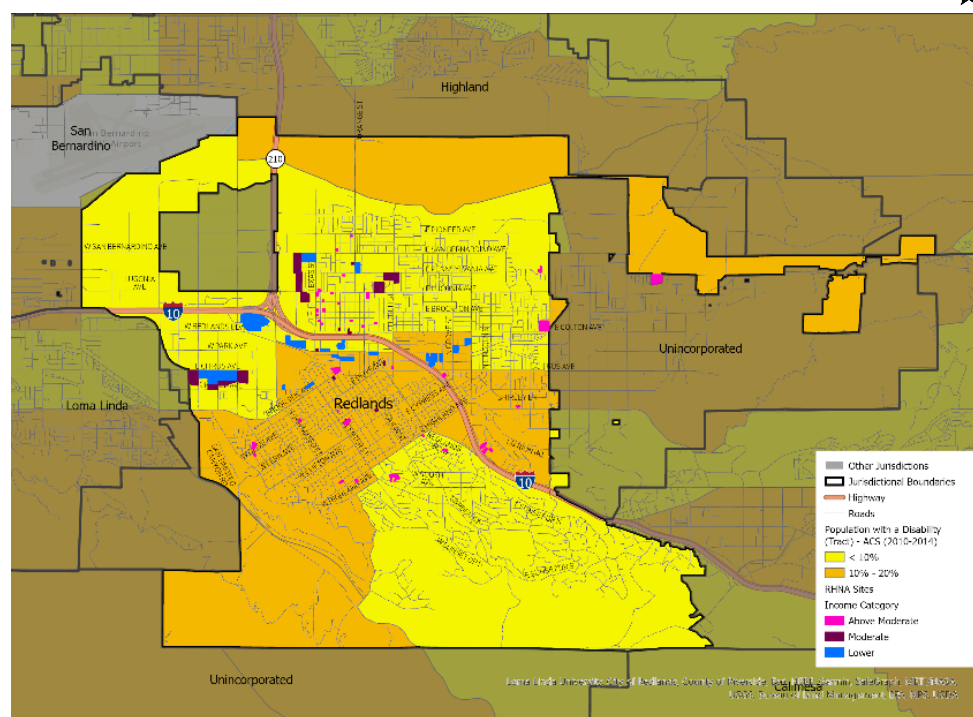
An equitable distribution of health-oriented community facilities and services, including recreation centers, medical facilities, and youth centers, helps ensure the well-being of residents. Figure 7-16Figure shows the RHNA sites and a relatively equal distribution across the City of individuals with disabilities.

FIGURE 7-16: RHNA SITE DISTRIBUTION AND POPULATION WITH A DISABILITY (2015-2019)



Population with a Disability, 2010-2014

0 0.5 1 2 Miles



RHNA Sites and Population with a Disability, 2015 - 2019

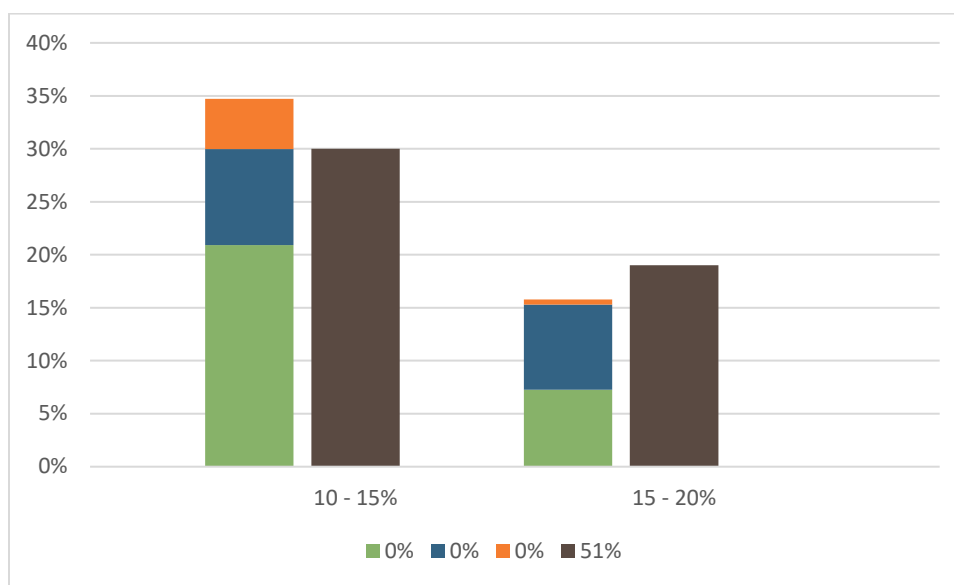
0 0.5 1 2 Miles

Source: HCD AFFH Mapping Tool.

Redlands is home to, or adjacent to, numerous care facilities including Redlands Community Hospital, Kaiser Permanente, Beaver Medical Group, and Loma Linda University Behavioral Medical Center, and these health care facilities are well distributed throughout the City. Overall, Redlands is well served by healthcare facilities, and there are no major clusters of the City without access to care.

The accompanying chart in Figure 7-17 ~~Figure~~ displays the breakdown comparison of RHNA units and the City acreage among the percentage of the population with a disability. There is no census tract with greater than 20% of the population having a disability. RHNA sites of all income levels are spread throughout the City. Sites are not overly concentrated in areas that have either high or low percentages of the population with a disability.

FIGURE 7-17: RHNA UNITS BY INCOME AND CITY COMPARISON BY DISABILITY STATUS



Source: HCD AFFH Mapping Tool and City of Redlands.

7.3.3.5 Findings

Overall, there are clear geographic patterns emerging, as evidenced in the university, downtown, and the southeast portions of the City. The university and downtown areas have substantial numbers of unmarried, childless people, living alone with lower incomes which is consistent with the existing land uses of the University of Redlands and older single- and multifamily housing stock in these areas. This central area also has a predominantly Hispanic population. In comparison, the southeast section of the City is a wealthy, mostly White, single-family area, consisting primarily of married couples with children. Existing land uses in this area consist primarily of post 1950s single-family dwellings on larger lots and in higher elevations (foothills). These trends of wealth, race, and marital status are not unique to the City and persist throughout the San Bernardino County region as discussed in the AI.

Contributing factors to fair housing issues pertaining to segregation patterns include the concentration of minority populations downtown, the concentration of available and appropriate housing for housing

choice vouchers, and the north/south segregation by race and income. These factors will be addressed by the City with actions such as those outlined in Programs 1.5-1, 1.1-3, 1.2-14, 1.5-8, 1.5-10, and 1.3-2:

- Placed Base Improvements
- Transit Villages Specific Plan
- Waive preapplication fee for affordable housing projects
- Residential Development in High Opportunity Areas
- NOFA/Non-Profit Housing Development
- Inclusionary Housing Ordinance

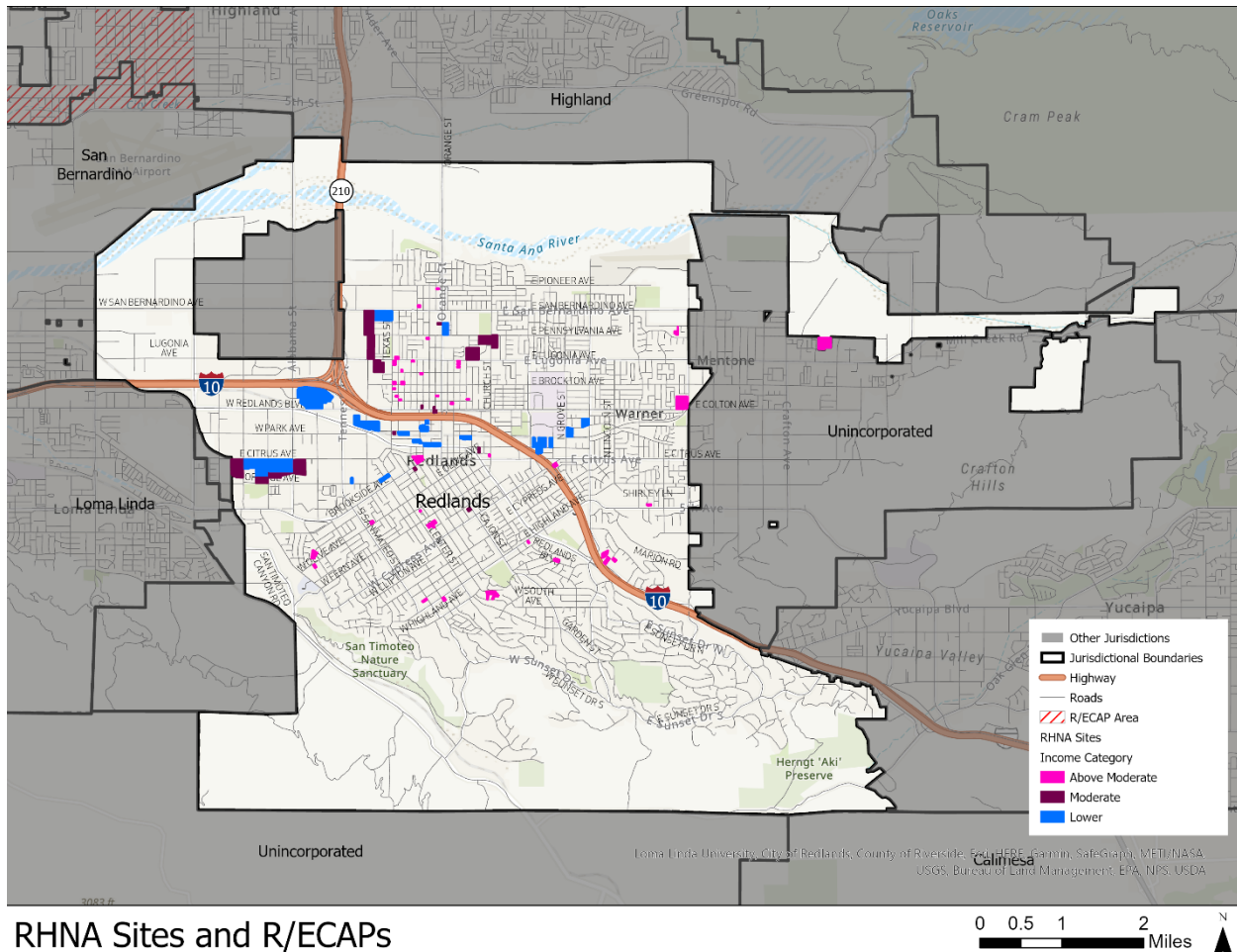
7.3.4 Racially & Ethnically Concentrated Areas of Poverty and Racially Concentrated Areas of Affluence

HUD defines a Racially and Ethnically Concentrated Area of Poverty (R/ECAP) as an area where the percentage of the population that is non-White is over 50% and the percentage of median household incomes below the poverty line is over 40%. R/ECAPs are often the focus of fair housing policy, but Racially Concentrated Areas of Affluence (RCAA) must be considered as well when attempting to eliminate areas of segregation. Overall, in the City of Redlands, the percentage of the population that is White is trending downward while the median household income is trending up. There are no R/ECAPs or RCAAs in Redlands. The sites inventory will not contribute to the creation of a R/ECAP.

Figure 7-18 ~~Figure~~ shows the RHNA sites in the City and R/ECAPs in the vicinity of the City of Redlands. There are 19 R/ECAPS in San Bernardino County, most of which are located in the City of San Bernardino. There are no R/ECAPs in the City of Redlands. The nearest R/ECAP is northwest of Redlands in the City of San Bernardino, where there are some disparities in access to opportunities. The remaining R/ECAPs are in Barstow, Colton, Grand Terrace, Adelanto, and El Mirage.

Although there are no R/ECAPs, the City of Redlands does have an area of high segregation and poverty, per the TCAC opportunity composite scores. The area is in the City's downtown surrounding the University of Redlands and has a sizeable Hispanic majority. The tract is highly developed but has poor TCAC scores and the highest number of adults living alone with no children. Contributing factors to the areas of high segregation and poverty include the older housing stock and buildings in the tract, limited housing opportunities for higher density and more affordable housing elsewhere in the City, and higher air pollution and diesel particulate pollution due to the proximity of I-10. While the current Downtown Specific Plan permits housing in this area and the City has seen some incremental improvements, this area will benefit from the Transit Villages Specific Plan (TVSP) as it will significantly expand opportunity for transportation, as well as increase housing near existing and future job opportunities. Additionally, the City is expanding its multi-family zoning in areas outside of this tract, providing new opportunities for high quality, affordable housing in new locations in the City.

FIGURE 7-18: RHNA SITES AND R/ECAPs (2021)



RHNA Sites and R/ECAPs

Source: HCD AFFH Mapping Tool.

In addition to R/ECAPs, RCAAs should be examined to ensure fair housing choice. Per HCD's AFFH Guidance document, a Racially Concentrated Area of Affluence (RCAA) is an area with a population that is greater than 80 percent White and has a median household income level over \$125,000.²⁵

There are no RCAAs in Redlands meeting this definition as the City has no areas where the percentage of the population that is White is over 79%. In fact, there are no RCAAs in San Bernardino County meeting this definition.

While the area around the Redlands Country Club in the southeast portion of the City is trends the closest to an RCAA, it trends the closest, with a median household income level over \$125,000 and a White population between 60 and 79%. Large parts of the southernmost areas of Redlands consist of agriculture

²⁵ Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update).

zoning. South Redlands does have higher levels of non-Hispanic white population and higher incomes as shown in Figure 7-19.

There are similar trends of northeast Redlands showing higher income levels and a population that is between 60 and 75% non-White. Census tract 06071007904 which has a portion in northeast Redlands, has a median income of \$145,409; however, this tract has no housing within the City and data for the tract reflects recently constructed subdivisions in the neighboring jurisdiction of Highland. The area of this tract within Redlands is zoned entirely for open space. The areas north of Santa Ana River in the City are all zoned for open space and have no housing within them. The rest of the northeast portion of the City, south of Santa Ana Creek has experienced significant growth in single family development, primarily through Planned Residential Developments. The cost of these newer single family housing units have increased rapidly with the boom in the housing market resulting in a consolidated area of higher housing costs. There are no RCAAs in San Bernardino County. Development of affordable units is unlikely in these areas due to single-family homes being the primary residence and HOA restrictions.

While not formally an RCAA, relative to the rest of the City these areas are whiter and more affluent. Development of affordable units is unlikely in these areas due to single-family homes being the primary residence and HOA restrictions. —Encouraging new development allowed by SB 9 and increased ADU construction, as outlined by Program 1.6-1, can increase affordable rental units in these areas and diversify the region.

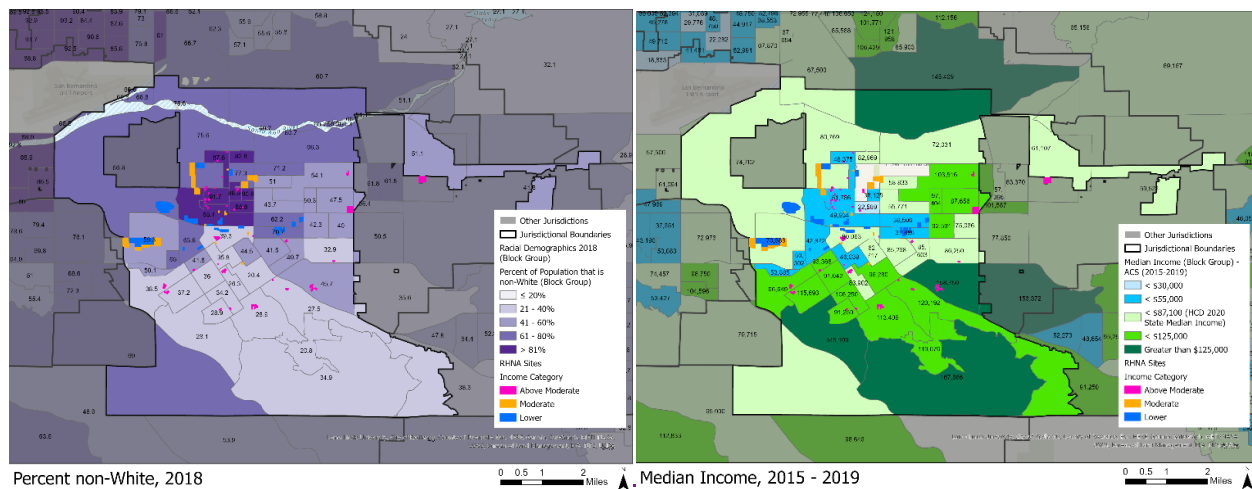
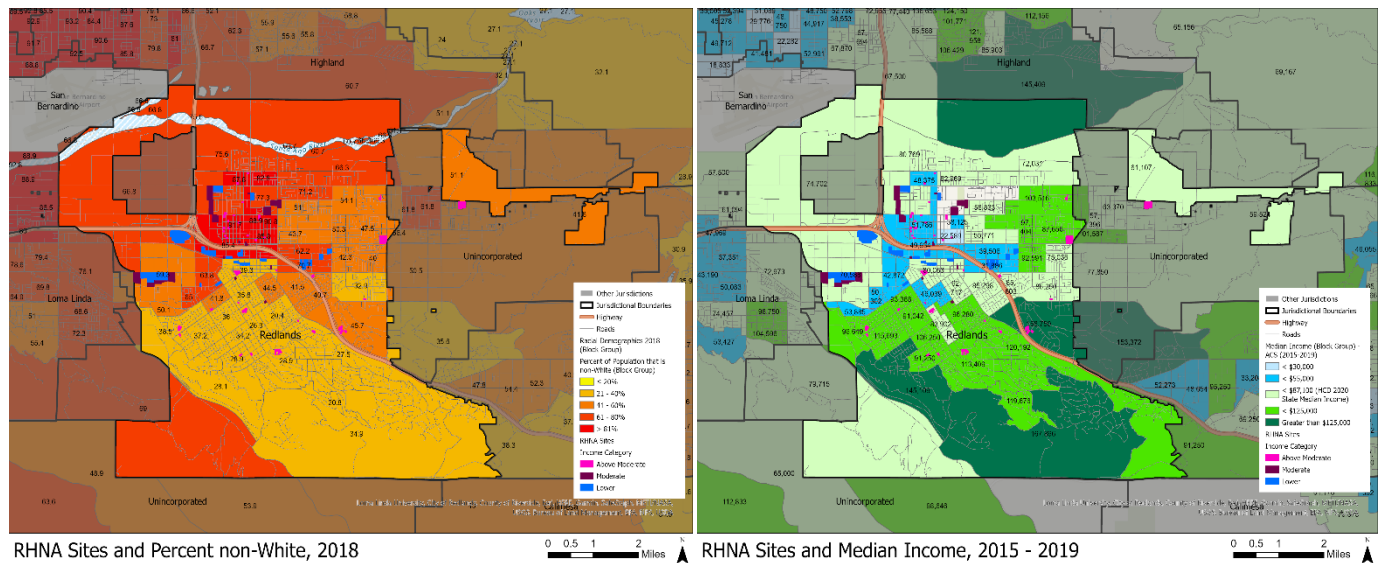


FIGURE 7-19: MEDIAN INCOME AND PERCENT NON-WHITE AND RHNA SITES



Source: HCD AFFH Mapping Tool.

7.3.5 Disparities in Access to Opportunity

California Tax Credit Allocation Committee (TCAC) Opportunity Areas

One tool used to analyze disparities in access to opportunities is the California Tax Credit Allocation Committee's (TCAC) Opportunity Area Scores. These were prepared by a task force commissioned by the TCAC and HCD to identify areas statewide whose economic, educational, and environmental characteristics support positive outcomes for low-income families. The tool is updated annually. Opportunity maps are made for three domains: economic, environmental, and education. Each map uses several indicators to determine their individual score. A composite score and resource designation combining the three categorical scores is assigned to each block group.

To determine final resource category, the top 20 percent of overall scores in a county are labeled as highest resource and the next 20 percent of scores are labeled as high resource. Then, any areas that are considered segregated and that have at least 30 percent of the population living below the federal poverty line are labeled as an area of High Segregation and Poverty. Any remaining uncategorized areas in the County are evenly divided between moderate resource and low resource areas.

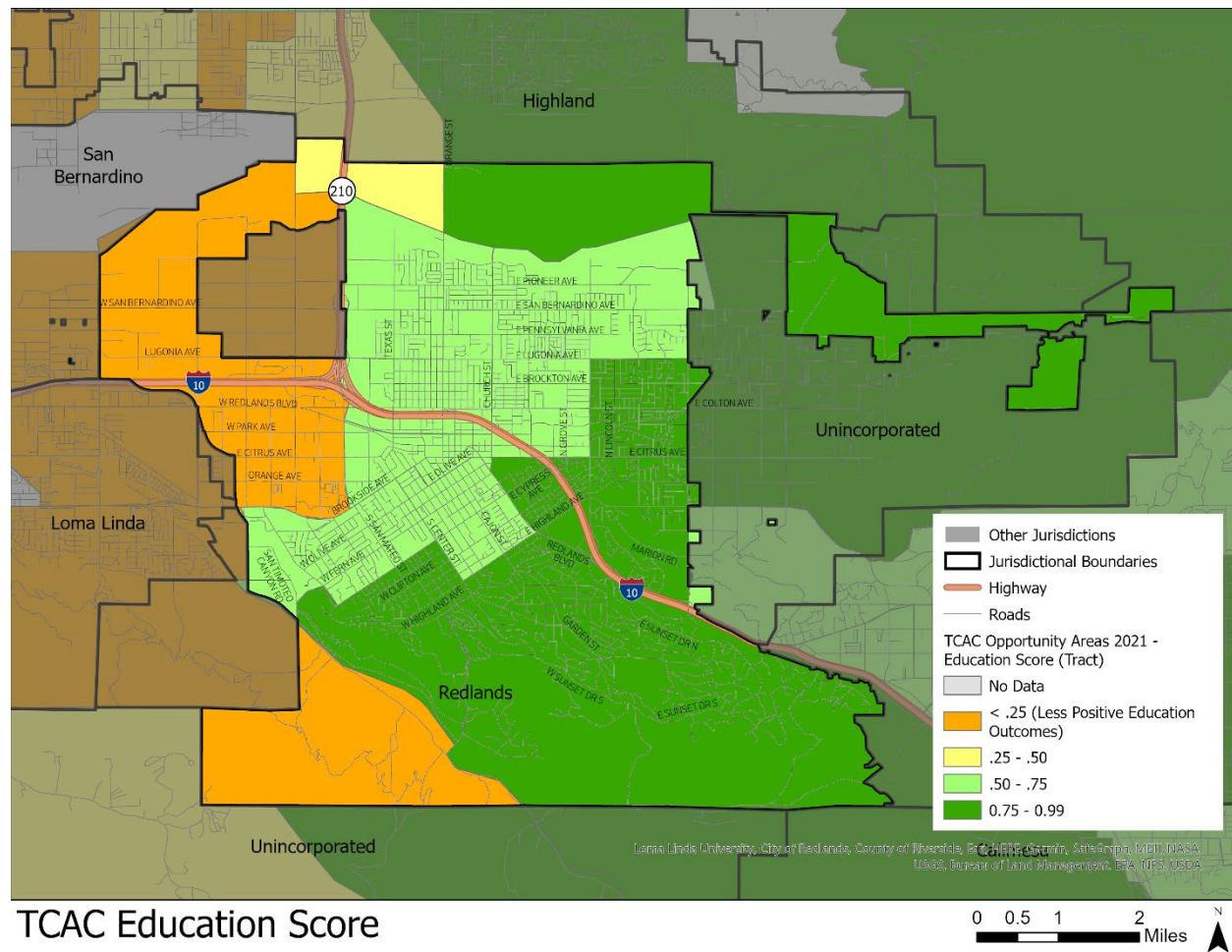
Education

Education indicators for the TCAC include math proficiency, reading proficiency, high school graduation rates, and student poverty rates. [Figure 7-20](#) displays the TCAC education scores for Redlands. Most of the City has positive educational outcomes. [The wealthiest areas of the City of Redlands, consisting of the southern section of the City, has the most positive educational outcomes, while the most highly segregated area have middle to high positive educational outcomes. The area with the least positive educational outcome is of moderate diversity and above moderate income. There does not seem to be a correlation between protected groups and proficient and less proficient schools. After requesting further information on disparities between schools in the area from the Redlands Unified School District, it was emphasized that resources are equitably distributed across the district with no disparities that are not actively addressed.](#)

[The area with the lowest education score is the northwestern part of the City. It has a high percentage of households with low to moderate income and a high average number of children per household.](#)

[Overall, the Redlands Unified School District has an average GreatSchools rating compared to other districts in the state. The ratings are based on academics, equity, and the school environment compared to other public schools in the state. Schools in the northern parts of the City have higher overall scores, while schools around downtown are rated below-average in quality. As public schools receive support from local taxes, these schools may have less resources to provide students with educational support. Additionally, the downtown area of the City has more children in single parent households than the southern area of Redlands, ~~so~~therefore working parents may not have as much time to provide study support for work outside of the classroom. There are less schools in northwest RedlandsRedlands, but this area is also majority industrial sites with very few residences.](#)

FIGURE 7-20: TCAC Education Score, 2021, REDLANDS



TCAC Education Score

Source: HCD AFFH Mapping Tool.

The wealthiest areas of the City of Redlands, consisting of the southern section of the City, has the most positive educational outcomes, while the most highly segregated area have middle to high positive educational outcomes. The area with the least positive educational outcome is of moderate diversity and above moderate income. There does not seem to be a correlation between protected groups and proficient and less proficient schools. After requesting further information on disparities between schools in the area from the Redlands Unified School District, it was emphasized that resources are equitably distributed across the district with no disparities that are not actively addressed.

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Economic

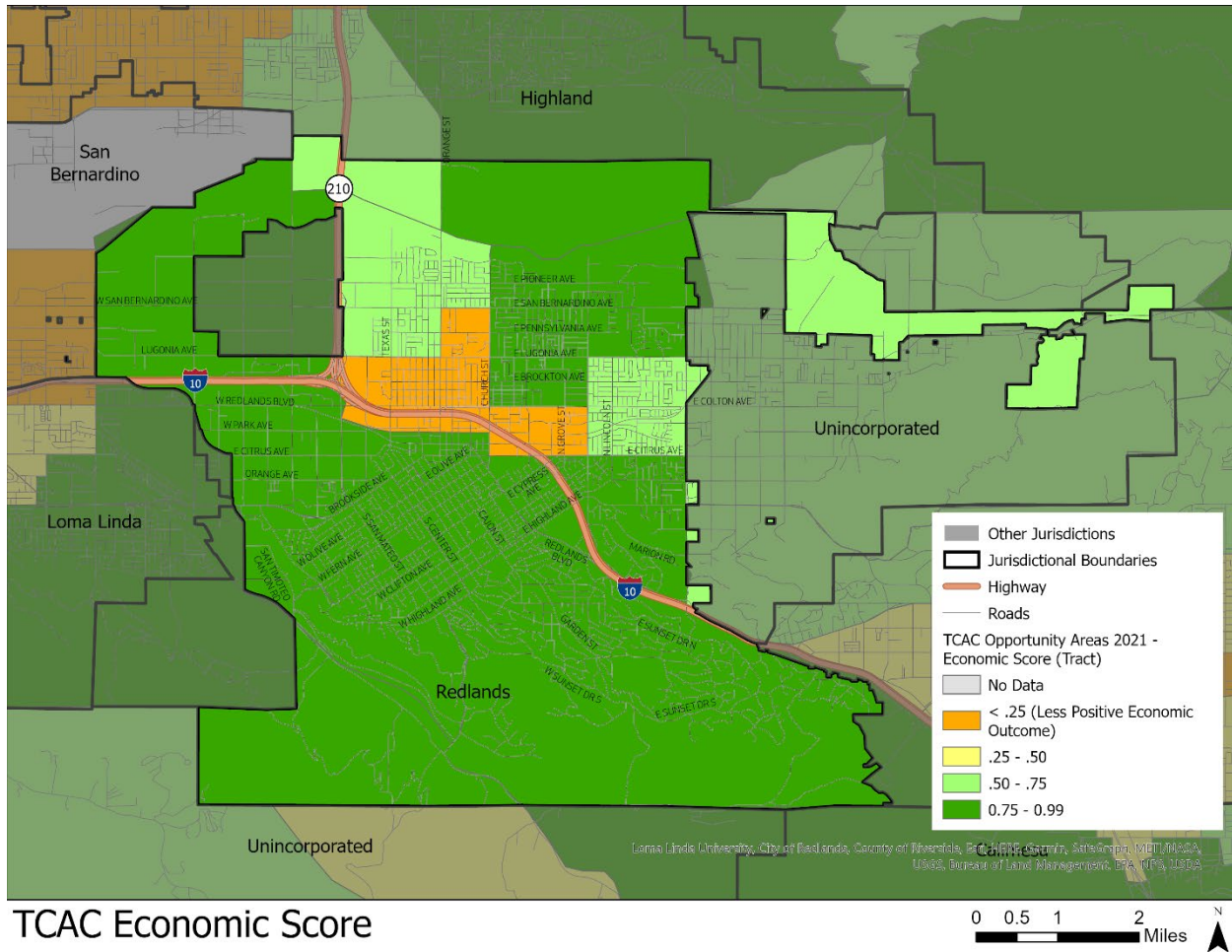
Economic indicators for TCAC scores include poverty, adult education, job proximity, employment, and median home values. The economic scores for Redlands are shown in Figure 7-21~~Figure~~. All of Redlands has a generally positive economic outcome score except for two census tracts in the center of the City. These two tracts have less positive economic outcome scores of 0.22. This is the area of high segregation and poverty. The next lowest census tract score in Redlands is 0.68.

The central tracts with scores of 0.22 may have skewed scores due to being occupied by the University of Redlands and therefore having a disproportionately high number of students who are more likely to be unemployed. These tracts also include the Sylvan Mobile Estates, Orange Grove Mobile Estates, and Redlands Ranch mobile home parks as well as two affordable housing developments operated by the San Bernardino County Housing Authority. This area has concentrations of multi-family development and historically lower priced housing opportunities leading to an area with lower incomes. Both census tracts have a high number of lower-income individuals but also a high number of job opportunities at the University, ~~or the~~ Esri campus, ~~the Post Office, the retail and service industry in both downtown Redlands and in the “donut hole”, and Redlands Unified School District.~~ There may still be low economic outcomes in the two identified tracts as many of these jobs require formal background or education.

The San Bernardino County Transportation Authority Regional Assessment of Fair Housing²⁶ document notes that across San Bernardino County, economic opportunity is higher in the East and West Valley and Mountain subregions and lower in the Morongo Basin and Desert Subregions. It lists the Cities of San Bernardino, Rialto and Fontana as those with lower economic opportunity in the region.

²⁶ San Bernardino County Transportation Authority, Regional Assessment of Fair Housing, August 2021 Draft.

FIGURE 7-21: TCAC ECONOMIC SCORE, 2021, REDLANDS



Source: HCD AFFH Mapping Tool.

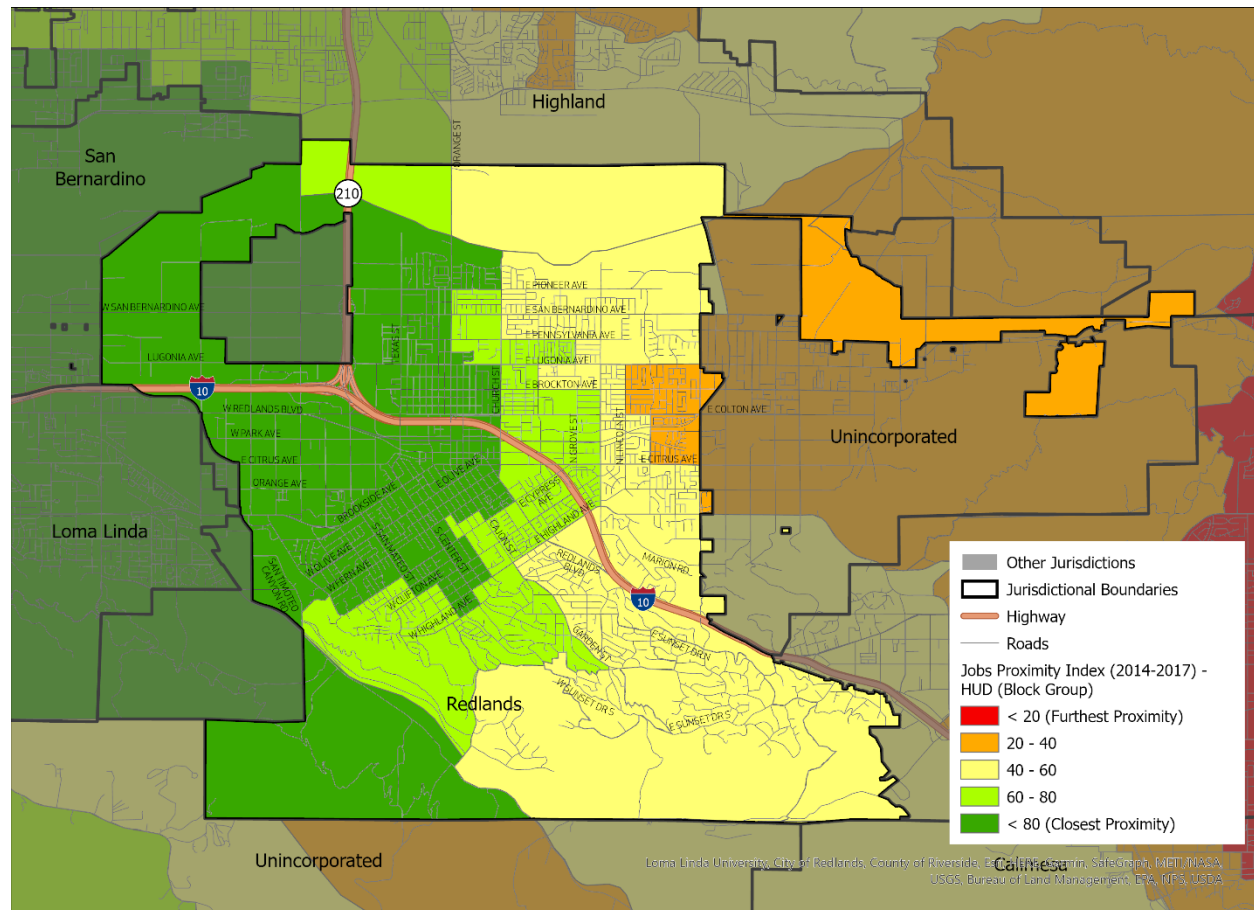
Employment

The areas with the lowest median household incomes and highest percentage of non-White population have the closest proximity to jobs and employment, as shown by Figure 7-22, while the wealthier, more suburban areas have the lowest proximity in the City. This implies there is not much disparity in access to jobs by protected groups. Importantly, the area considered by TCAC to be “High Segregation and Poverty” has some of the best access to jobs of all types, including high-tech, service, agricultural, and retail industries. Central Redlands has excellent access to ESRI and the University of Redlands, which are high quality employers. Additionally, these areas have access to major employers immediately outside of the City boundary, such as the Loma Linda University and Medical Center, and multiple logistics/industrial facilities in the unincorporated donut hole.

The area in the southeast of the City contains hilly terrain and is currently zoned for single-family residential, is almost entirely built-out with single-family neighborhoods, and the lack of commercial, professional, or industrial space can be one reason for the lack of job proximity. The community input

received for this cycle indicated that residents felt that limited transit is affecting access to employment and requested that the TVSP area provide sufficient housing to increase the number of residents with excellent access to transit. The compact mixed-use villages centered around the three new Metrolink/Arrow passenger light rail stations of the TVSP will improve access to jobs in this area by increasing density near transit as well as increasing transportation services.

FIGURE 7-22: JOB PROXIMITY INDEX, 2014-2017 REDLANDS



Jobs Proximity Index

Source: HCD AFFH Mapping Tool.

Environmental

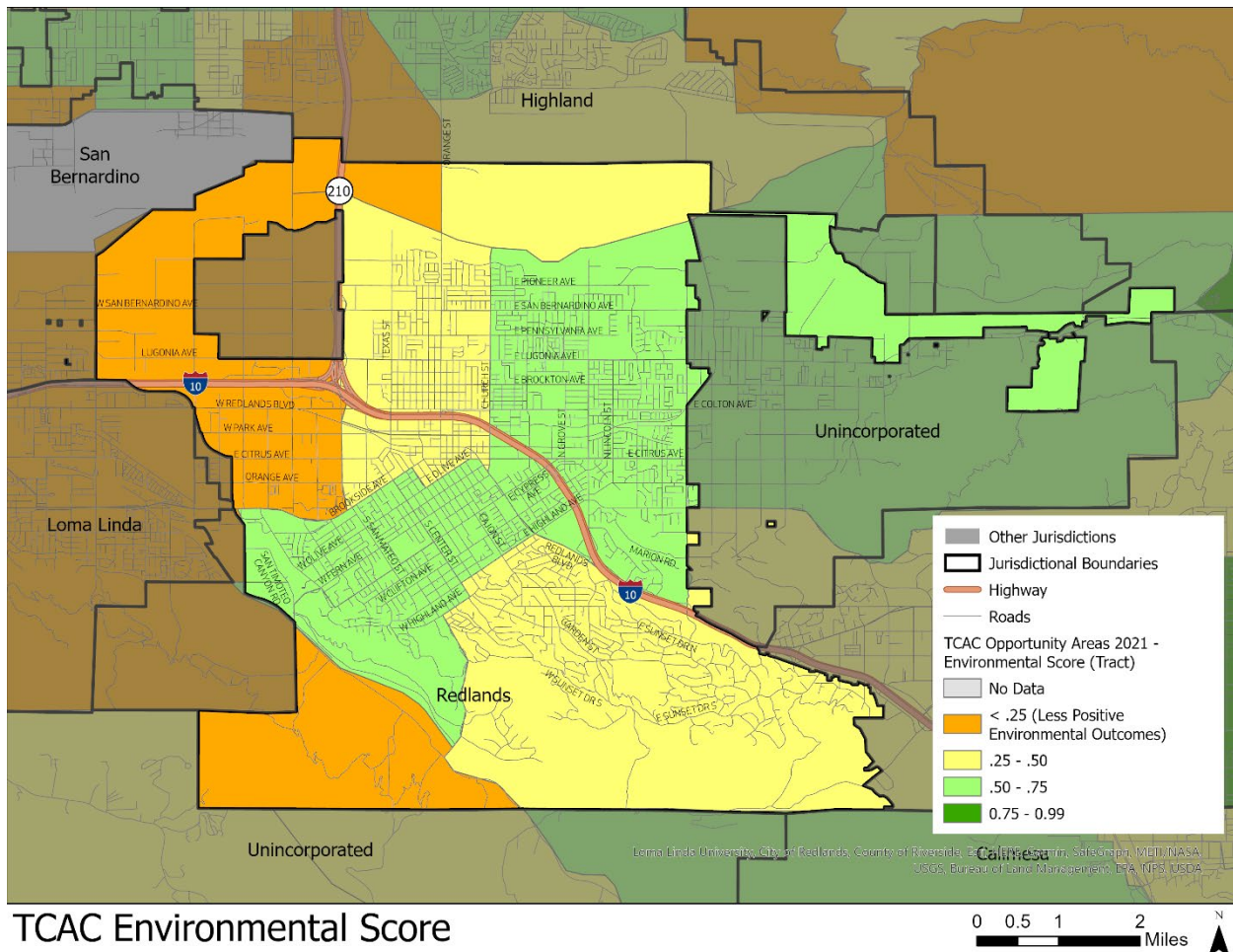
The TCAC environmental score is based on CalEnviroScreen 3.0 pollution indicators and values. Environmental scores are lowest (worst) throughout the middle section of the City, and City and are higher (better) on the north and south ends. The lowest (worst) environmental scores are seen on the border of Loma Linda and San Bernardino.

Overall, Redlands achieves less favorable TCAC scores for environmental conditions than it does for economic and education opportunities. This is largely explained by air quality pollution from I-10, SR 210, large logistic and distribution uses in and around the donut hole and airport. Some of these effects are

mitigated by the strong economic and educational resources of Esri and the University of Redlands. These areas also correspond with the areas with lower incomes, higher rates of poverty, racial and ethnic segregation, and single-parent households.

The downtown/central area census tract (06071008002) is in the 91st percentile for communities in the State that are disproportionately burdened by multiple sources of pollution. The northwest second census tract (6071007800) is in the 73rd percentile, which is very close to the 75th percentile threshold to require preparation of an Environmental Justice Element.

FIGURE 7-23: TCAC ENVIRONMENTAL SCORE, 2021, REDLANDS



Source: HCD AFFH Mapping Tool.

CalEnviroScreen

CalEnviroScreen 4.0 is a tool that identifies communities in California that are affected by pollutants and polluting factors such as ozone, particulate matter, drinking water contaminants, pesticide use, lead, toxins, diesel particulates, traffic density, cleanup sites, groundwater threats, hazardous waste, solid

waste, and impaired water bodies. A higher score indicates a higher effect of pollutants on the indicated area. RHNA sites and the CalEnviroScreen 4.0 scores for Redlands are shown in Figure 7-24.

A high CalEnviroScreen 4.0 score indicates high pollution. Scores are on a scale of 0-100. Therefore, an area with a score in a high percentile, such as the areas around the donut hole that have scores between 71 and 80, has high levels of pollution from ozone, diesel matter traffic, or drinking water contamination. If an area is in the top 25% of CalEnviroScreen scores, the city must include environmental justice goals in its general plan.

The lower half of the City, which is predominantly white families, has the lowest scores in the City of Redlands, with a middle range of scores from 21%-60%. The mid-range scores extend through the northeast corner of the City. The area around the “donut hole” in the northwest corner of the City has a higher score of 71%-80% due to high ozone, diesel particulate matter, traffic, and drinking water contaminant scores. These scores can be attributed to the location central to major Highways 10 and 210, as well as the San Bernardino Airport, which lead to ozone and diesel particulate matter contaminated air from vehicle emissions. Additionally, this neighborhood is primarily industrial, with a large number of warehouses and distribution facilities. The location directly east of the airport is in the 91%-100% score range, which may also be explained by the high ozone levels that comes with adjacency to a commercial airport. The City is also a location for four Superfund sites:

- Lockheed Propulsion Co., 1500 Crafton Avenue, northeast portion of the City
- Redlands Airport, 1745 Sessums Drive, northeast portion of the City
- Redlands Shooting Park, 2125 Orange Street, north-central portion of the City
- Redlands Smudge Pot Tanks Site, 100 Feet West of Redlands Boulevard and Texas Street, central portion of the City

Neither information on the type of contaminants nor the status were available. None of these Superfund sites are within residential zoning districts.

In recent years, the City has required air quality and health risk assessments be prepared for residential or educational facility projects within 500 feet of major arterials, highways, or interstates. In these scenarios, the City has required high efficiency particulate air filters with a Minimum Efficiency Reporting Value (MERV) of 13 or better, which is the highest end of the MERV range.

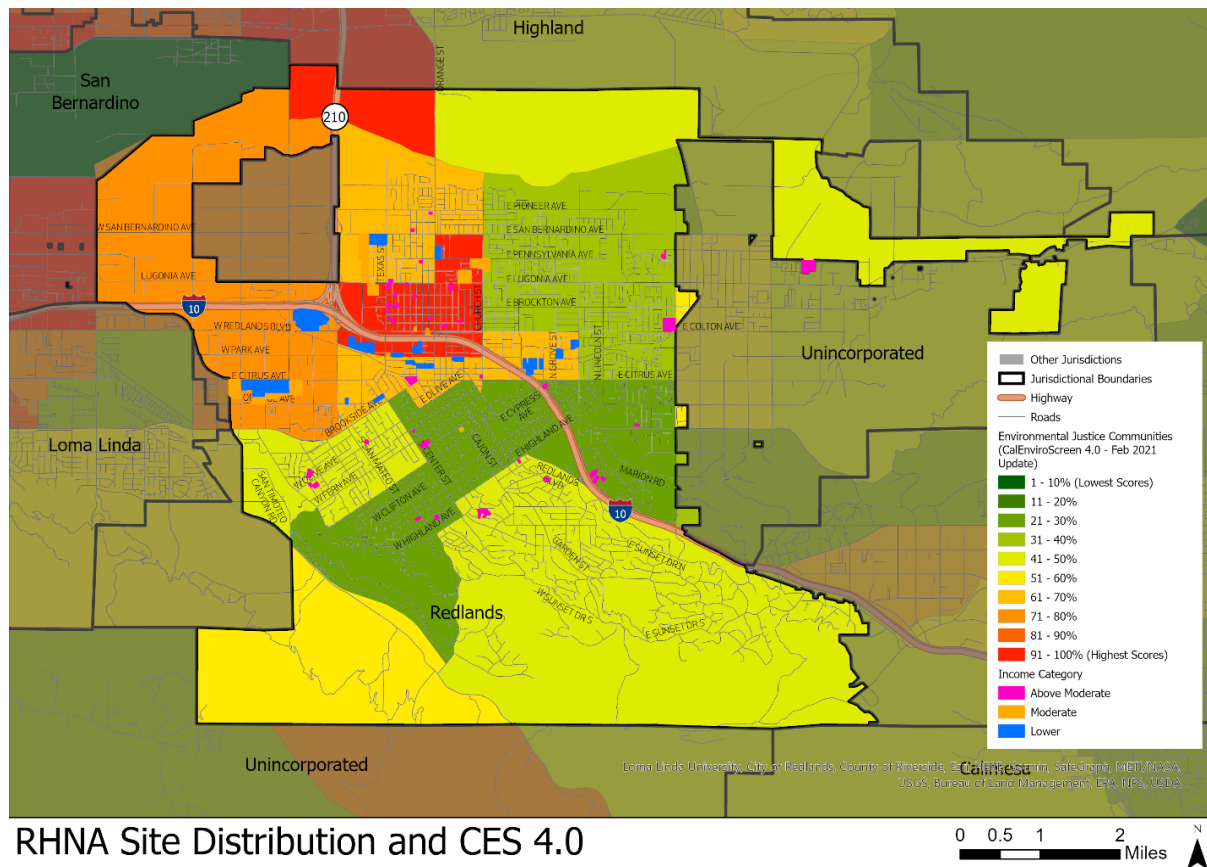
The area with the highest score, in the 91%-100% range, is the area of high segregation and poverty in central Redlands, including downtown and the university areas. Much like the area near the airport, this tract earns its high score from ozone and diesel particulates in the air from industrial uses and traffic on Highway 210 and I-10. This area may have a higher score than the northwest, as poverty is a factor in CalEnviroScreen 4.0, and this area is specifically labeled as high poverty.

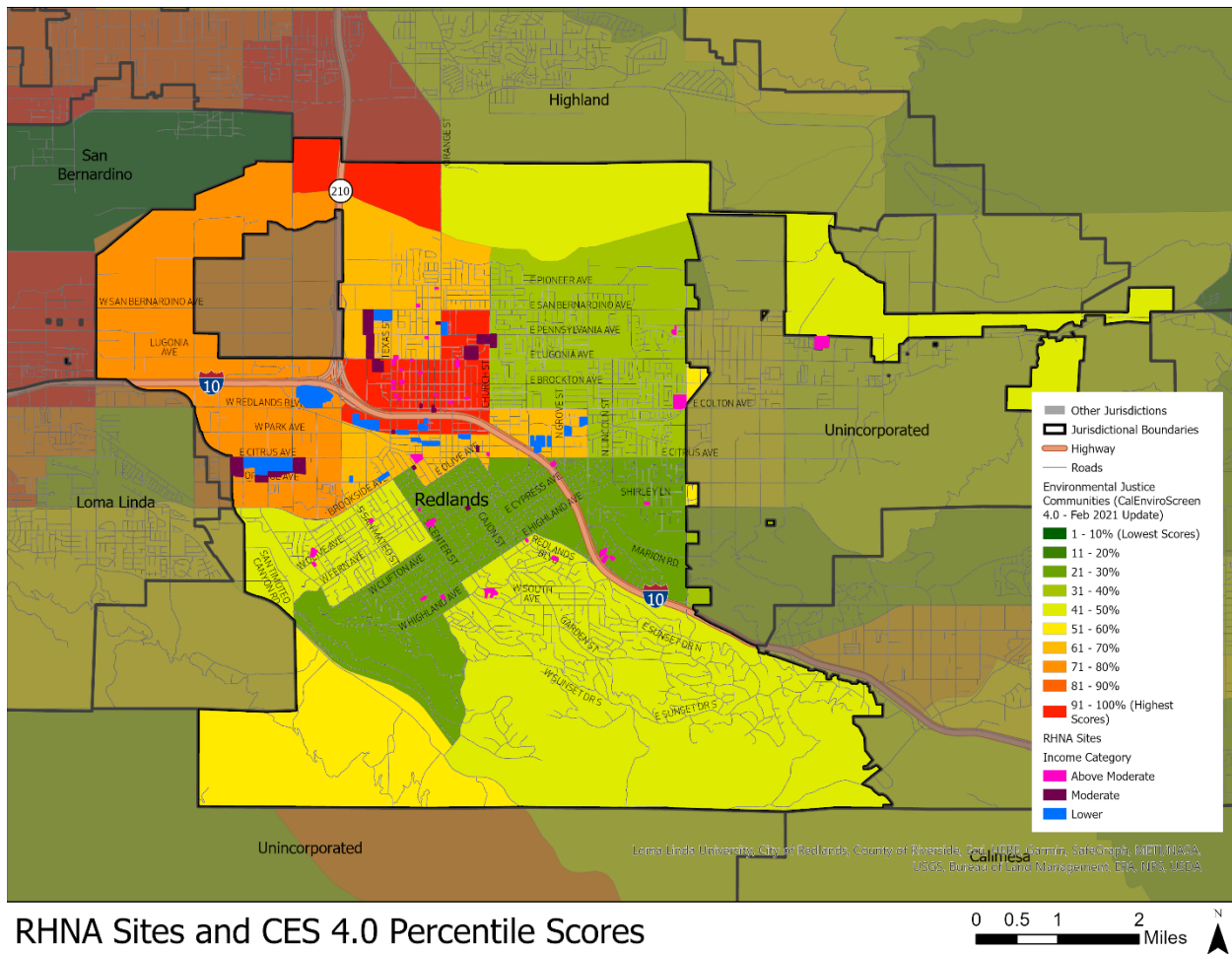
Figure 7-24 displays the RHNA sites by income level and CalEnviroScreen 4.0 percentiles scores. The accompanying chart in Figure 7-25 displays the percentage of RHNA units and City acreage that fall into each percentile group of the CalEnviroScreen 4.0 scores. Almost 50% of RHNA units are located in an area

that is in the 70th to 80th percentile of CalEnviroScreen 4.0. However, despite the poor CalEnviroScreen scores, these areas have the best long-term opportunities and access to transit, employment, services, and supporting infrastructure. Transit improvements and investments may lower traffic and pollution scores in the areas. The massive investments in the three new Metrolink stations and the TOD planned as part of the TVSP will ensure that these areas will have among the best quality of life in the area. Environmental concerns, primarily air quality pollutants from the freeways and San Bernardino Airport can be mitigated with high efficiency HVAC filtration that ensures excellent indoor air quality.

Comparatively to the region, Redlands has higher CES 4.0 scores than jurisdictions to the west and south, such as the City of San Bernardino, Colton, and parts of Riverside county, which all have high CES 4.0 percentile scores in the 80s and 90s. It scores similarly to jurisdictions to the east, such as Yucaipa and unincorporated areas of San Bernardino County.

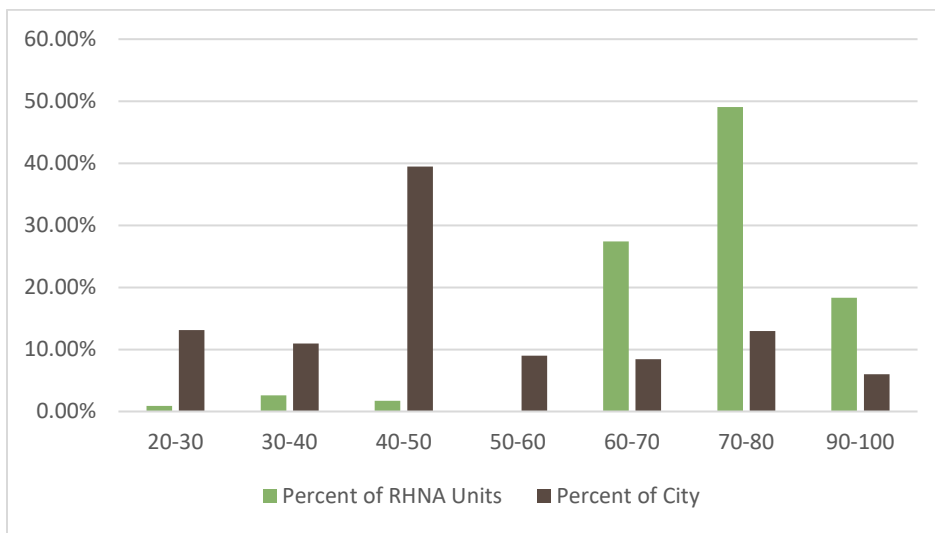
FIGURE 7-24: RHNA SITE DISTRIBUTION AND CALENVIROSCREEN 4.0 (2021)

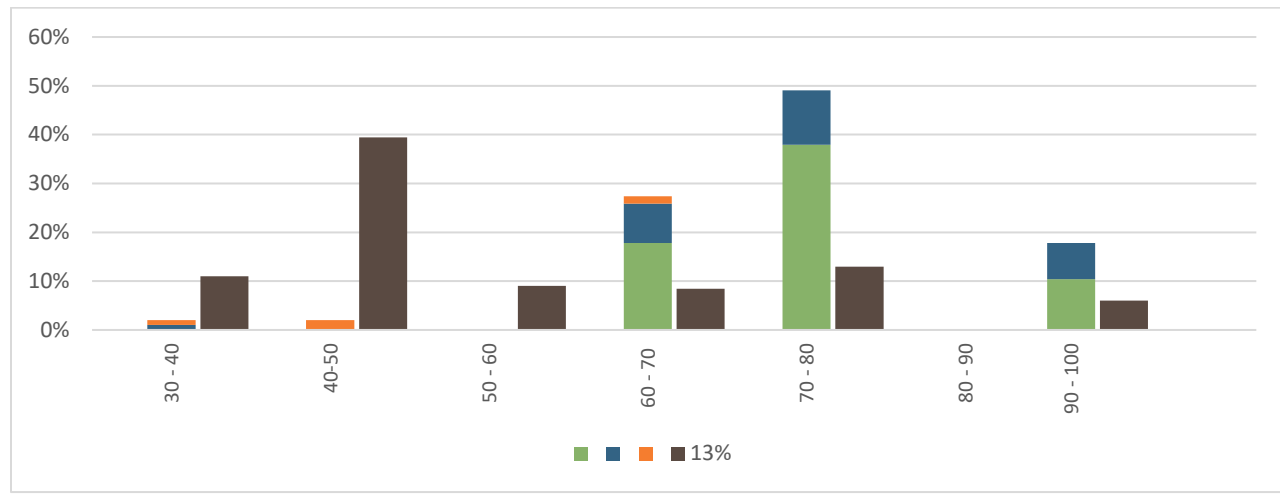




Source: [HCD AFFH Mapping Tool](#).

FIGURE 7-25: RHNA UNITS BY INCOME AND CITY ACREAGE BY CAL ENVIRO SCREEN 4.0 PERCENTILE





Source: HCD AFFH Mapping Tool and City of Redlands. [Transportation](#)

Table 7-4 provides additional details on the CES 4.0 scores for each census tract. The census tracts are shown with their population, CES 4.0 percentile score, TCAC opportunity category, and selected categories from the CES score of pollution percentile, poverty percentile, and traffic percentile. These factors are some of those that vary widely across the City and show the differences in environmental hazard exposure between the tracts. As shown in the map above, tracts in the southern and northwestern area have the most positive CES 4.0 scores. [This](#)

There are three tracts are 6071007200, 6071007604, and 6071008002 that fall above the 90th percentile range. These are low resource and the area of high segregation and poverty. These areas are within the TVSP. These areas are classified as disadvantaged communities and would be the areas subject to an Environmental Justice Element to address the needs of these areas.

TABLE 7-4: CES 4.0 SCORES BY CENSUS TRACT

| Census Tract | Population | Cal Enviro Score Percentile | Pollution Percentile | Poverty Percentile | Traffic Percentile | Opportunity Category |
|--------------|------------|-----------------------------|----------------------|--------------------|--------------------|----------------------|
| 6065042412 | 5129 | 39.0 | 31.7 | 27.0 | 20.3 | Moderate Resource |
| 6065043822 | 2689 | 71.6 | 74.6 | 44.5 | 32.3 | High Resource |
| 6065043823 | 7023 | 44.1 | 51.0 | 16.9 | 50.9 | Highest Resource |
| 6071007200 | 6798 | 92.3 | 96.8 | 85.8 | 80.1 | Low Resource |
| 6071007302 | 10039 | 55.4 | 84.1 | 23.8 | 27.0 | Moderate Resource |
| 6071007306 | 5859 | 32.1 | 79.7 | 54.5 | 35.7 | Moderate Resource |
| 6071007604 | 4306 | 91.2 | 93.5 | 52.4 | 54.3 | Low Resource |
| 6071007800 | 4912 | 73.2 | 95.0 | 58.4 | 81.0 | Low Resource |
| 6071007904 | 6697 | 49.2 | 48.6 | 17.9 | 12.6 | Highest Resource |

| Census Tract | Population | Cal Enviro Score Percentile | Pollution Percentile | Poverty Percentile | Traffic Percentile | Opportunity Category |
|--------------|------------|-----------------------------------|-------------------------|-----------------------|-----------------------|---------------------------------|
| 6071008001 | 6513 | 69.0 | 62.7 | 40.6 | 71.6 | High Resource |
| 6071008002 | 7256 | 90.4 | 88.1 | 95.6 | 80.0 | High Segregation and Poverty |
| 6071008100 | 3182 | 67.5 | 71.6 | 75.8 | 32.1 | High Resource |
| 6071008200 | 5147 | 29.5 | 44.9 | 49.2 | 6.7 | High Resource |
| 6071008301 | 6340 | 41.7 | 45.7 | 28.3 | 7.1 | High Resource |
| 6071008302 | 3106 | 20.6 | 38.4 | 13.4 | 4.5 | Highest Resource |
| 6071008401 | 9953 | 33.3 | 37.0 | 38.0 | 14.9 | High Resource |
| 6071008402 | 6448 | 35.0 | 22.5 | 38.4 | 9.2 | High Resource |
| 6071008403 | 5833 | 24.8 | 53.4 | 14.0 | 69.6 | Highest Resource |
| 6071008404 | 2729 | 66.8 | 56.4 | 92.5 | 73.8 | Moderate Resource |
| 6071008500 | 8316 | 42.2 | 83.3 | 12.8 | 69.5 | Highest Resource |
| 6071008601 | 5618 | 50.7 | 47.5 | 45.7 | 6.6 | High Resource |
| 6071008602 | 3564 | 46.7 | 51.5 | 37.0 | 6.4 | High Resource |
| 6071008706 | 12298 | 31.9 | 60.8 | 22.1 | 65.0 | High Resource |

Source: CalEnviroScreen 4.0

Composite Scores

Figure 7-26 displays the TCAC composite score for Redlands. Composite scores vary throughout the City, with higher resources on the northern and southern portions of the City. There is one tract with high segregation and poverty in the center of the City. Tracts on the west side of the City are identified as low resource areas. Contributing factors to the areas of high segregation and poverty include the older housing stock and buildings in the tract, limited housing opportunities for higher density and more affordable housing except in these areas, and higher air pollution and diesel particulate. The single-family housing stock in this census tract is not dissimilar in age, type, and size as the housing stock in the south-central portion of the City; however, the south-central portion of the City has several locally designated historic districts and individually designated historic structures. The City's policies on historic preservation and the application of historic district designations to the south portion of the City has resulted in better maintenance and higher desirability. While a historic resources survey of housing stock north of I-10 found that the north-central area was eligible for local historic district designation, this area has no protections or guidelines for historic structures. This dichotomy of historic preservation application can be attributed to the north-central portion of the City having greater rehabilitation and maintenance needs, thus contributing reduced desirability.

In the Inland Empire as a whole, just over 9% of the tracts have high segregation and poverty, including the areas surrounding the San Bernardino Airport, adjacent to the City of Redlands.

The four environmental, education, economic, and composite TCAC scores are shown in [Table 7-5](#) for each census tract. The two lowest scoring tracts are in the downtown/central and northwest areas. One tract (06071008002) is identified as high segregation and poverty, the second census tract identified as ~~low-resource~~[low resource](#). It includes the donut hole that is not within City boundaries. Two tracts are moderate resource, one of which is east of the tract that is high segregation and poverty. Additionally, the tract in the southwestern corner of the City is moderate resource however, the majority of this tract lies in the City of Loma Linda. The rest of the tracts in Redlands are high or highest resource.

TABLE 7-5: OPPORTUNITY MAP SCORES AND CATEGORIZATION, 2021

| Census Tract | Economic Domain Score | Environmental Domain Score | Education Domain Score | Composite Index Score | Final Category |
|-----------------------------|-----------------------|----------------------------|------------------------|-----------------------|--|
| 06071007800 | 0.61 | 0.01 | 0.53 | 0.38 | Low Resource |
| 6071007901 | 0.85 | 0.74 | 0.81 | 0.61 | Highest Resource |
| 06071007903 | 0.81 | 0.66 | 0.81 | 0.55 | Highest Resource |
| 06071007904 | 0.90 | 0.45 | 0.81 | 0.59 | Highest Resource |
| 06071008001 | 0.59 | 0.37 | 0.60 | 0.04 | Moderate Resource |
| 06071008002 | 0.09 | 0.26 | 0.53 | N/A | High Segregation & Poverty |
| 6071008100 | 0.66 | 0.37 | 0.79 | 0.30 | High Resource |
| 06071008200 | 0.85 | 0.62 | 0.77 | 0.51 | Highest Resource |
| 6071008301 | 0.84 | 0.54 | 0.80 | 0.52 | Highest Resource |
| 06071008302 | 0.94 | 0.71 | 0.77 | 0.66 | Highest Resource |
| 06071008401 | 0.78 | 0.62 | 0.63 | 0.27 | High Resource |
| 6071008402 | 0.62 | 0.75 | 0.74 | 0.33 | High Resource |
| 06071008403 | 0.90 | 0.57 | 0.83 | 0.65 | Highest Resource |
| 06071008404 | 0.17 | 0.54 | 0.72 | 0.07 | Moderate Resource |
| 06071008500 | 0.98 | 0.29 | 0.90 | 0.85 | Highest Resource |

Source: California Fair Housing Task Force; TCAC/HCD Opportunity Maps, 2020 Statewide Summary Table, December 2020.

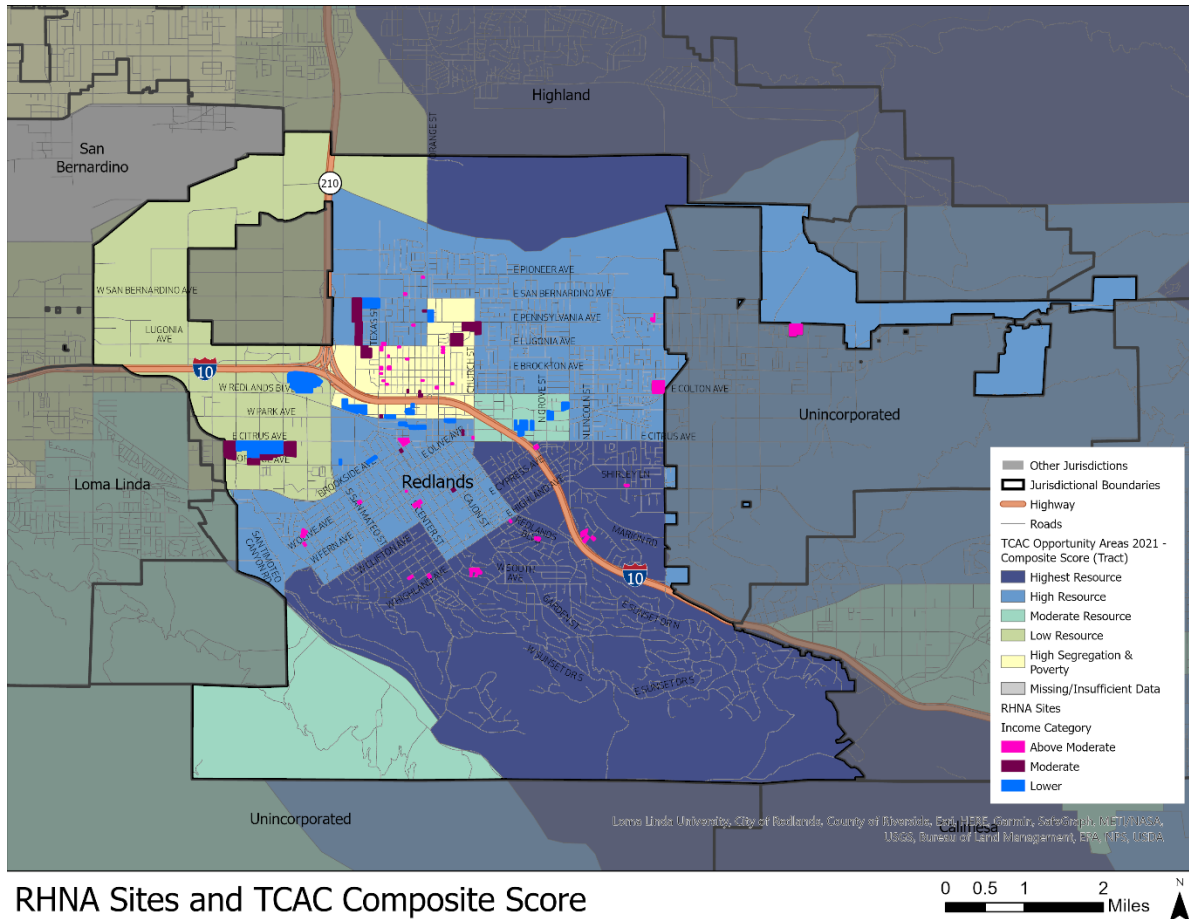
The City has prepared a draft Transit Villages Specific Plan (TVSP) that is currently undergoing environmental review and is anticipated to be heard for adoption in mid-2022. The TVSP would establish a policy environment promoting transit-oriented development (TOD) around three Metrolink / Arrow passenger light rail stations that have been recently constructed and are presently undergoing testing for live operation in 2022. These stations are located at the Esri campus, downtown Redlands Santa Fe Depot, and the University of Redlands. The combination of the transit ~~stations,~~[complementary stations,](#)

complementary and mixed land uses, and new TVSP and/or development code updates promoting TOD will attract investment, opportunity, and resources to the areas of the City in most need.

The TVSP is a place-based investment in central Redlands. The TVSP will not cause any displacement, as the areas surrounding the specific plan area are largely non-residential; any residential areas nearby were not included in the plan in order to prevent displacement. Redeveloping the area to transit-oriented-development will only benefit the area and increase opportunity, not cause any displacement.

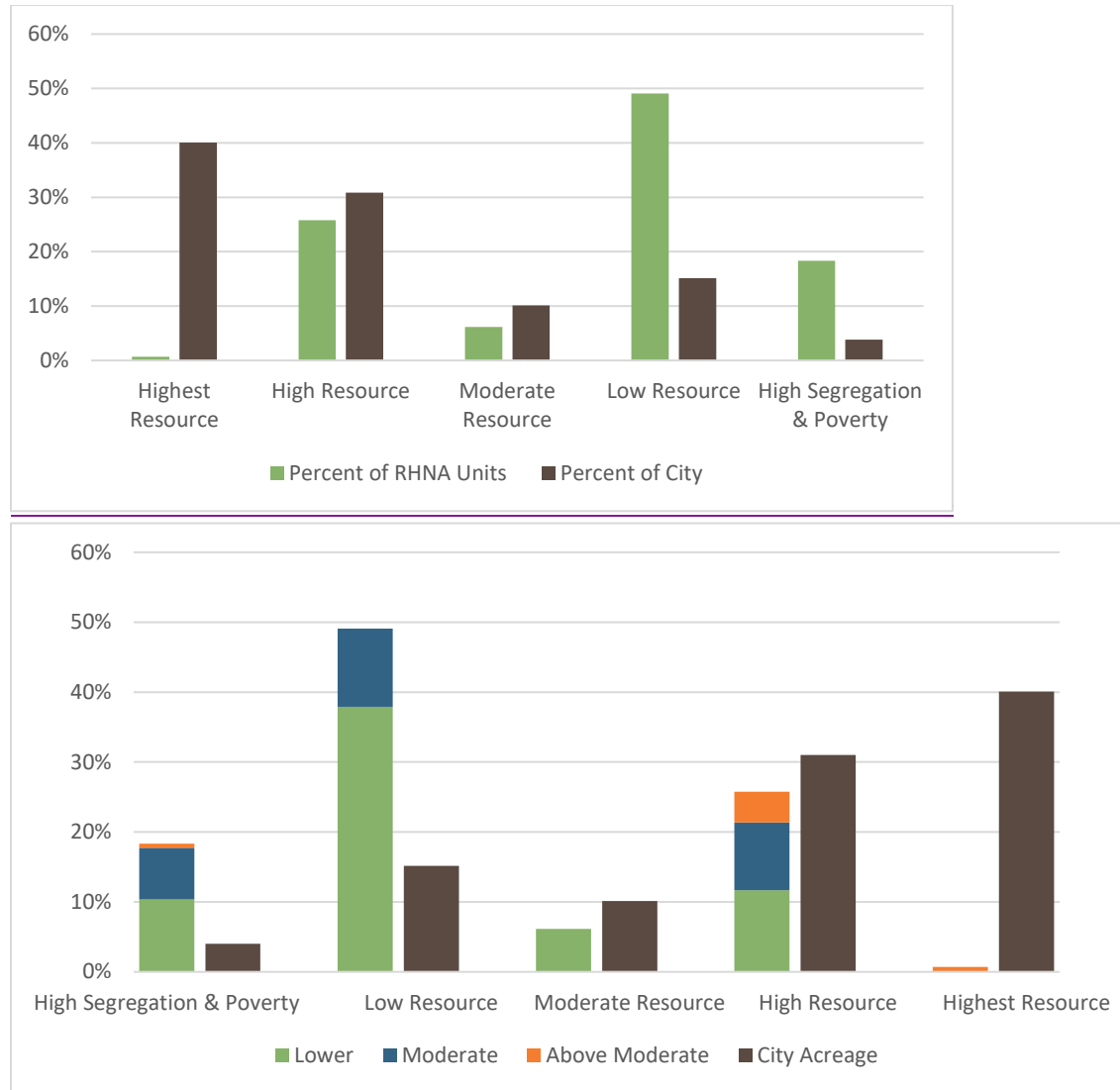
Figure 7-26 displays the RHNA sites by income level and TCAC composite score by census tract. The accompanying chart shown in Figure 7-27 displays the percentage of RHNA units by income and percentage of the City acreage in each TCAC opportunity designation. One census tract falls into the high segregation and poverty category, and slightly less than 20% of units are located in the tract. Just under 50% of units are located in the low resource category. Though much of the City is in the highest resource category, the highest resource areas in the south part of the City are not suitable for moderate- or high-density housing. It includes areas of open space and with topographic challenges to development in the southeast portion of the City. Sites that are located in high resource areas include a mix of anticipated income levels. -The highest resource designated areas, the south part of the City, do not have access to downtown and employment centers via public transportation.

FIGURE 7-26: RHNA Sites and TCAC Composite Score (2021)



Source: HCD AFFH Mapping Tool.

FIGURE 7-27: RHNA UNITS BY INCOME AND COMPARISON BY TCAC COMPOSITE CATEGORY



Source: HCD AFFH Mapping Tool and City of Redlands.

Though the RHNA sites are concentrated in areas that have lower TCAC designations, they are located in areas suitable for further development in the City. Many RHNA sites are located in the TVSP area, the TVSP is anticipated to attract investment and increase access to resources in the downtown area of the City. RHNA Sites are located in areas with access to public transit and downtown resource and services. The sites are not expected to have an adverse effect on access to opportunities but rather improve and revitalize access to opportunities in the areas of the City with lower TCAC designations.

7.3.5.1 Opportunity Indicators Regional Comparison

Table 7-6 compares access to opportunities between Redlands and San Bernardino County as a whole. These indicators are based on HUD's set of opportunity indices. In many of the indicators, Redlands scores

are close to the County as a whole. Redlands has a higher rate of poverty among Native American and Alaska Natives and Native Hawaiian and Other Pacific Islanders. These two groups combined make up less than 2% of the population in Redlands.

Redlands has a lower percentage of Title I Schools in comparison to the County. A Title I school is a school in which children from low-income families make up at least 40% of the enrollment. Title I schools are eligible to use federal grant funds to help meet the educational needs of students.

Compared to the region, downtown Redlands and the TVSP area has excellent access to employment, and transportation, and education opportunities. The new light rail represents a regional opportunity to increase equity and provide climate-friendly housing growth and development.

TABLE 7-6: ACCESS TO OPPORTUNITY INDICATORS – CITY AND COUNTY

| Indicator | Redlands | San Bernardino County |
|--|----------|-----------------------|
| Poverty Rate | | |
| Population Below Federal Poverty Level | 11.2% | 13.3% |
| White alone | 8.7% | 10.3% |
| Black or African American alone | 17.9% | 20% |
| Native American and Alaska Native alone | 18.1% | 9.5% |
| Asian alone | 8.5% | 7.7% |
| Native Hawaiian and Other Pacific Islander alone | 53.4% | 24.9% |
| Hispanic or Latino | 15% | 14.3% |
| School Proficiency | | |
| Total Title I Schools | 17 | 472 |
| Total Schools | 26 | 558 |
| % of Schools | 65.4% | 84.6% |
| Unemployment Rate | | |
| February 2021 | 4.8% | 8.6% |
| Transit Metrics | | |
| All Transit Performance Score | 6.0 | 4.4 |
| Transit Trips Per Week within ½ Mile | 1,534 | 1,098 |
| Jobs Accessible in 30-Min Trip | 43,978 | 44,660 |
| Commuters Who Use Transit | 0% | 1.6% |
| Transit Routes within ½ Mile | 2 | 3 |

Source: 2020 Regional Analysis of Impediments to Fair Housing Choice; California Department of Education Public Schools and Data File February 2020; California Employment and Development Department, Labor Force and Unemployment Rate for Cities and Census Designated Places, February 2021; <https://alltransit.cnt.org/metrics/>, accessed July 20, 2021; CalEnviroScreen 3.0 Results (June 2018 Update).

Sum does not equal 100 due to rounding.

Transportation

Omnitrans is San Bernardino County's public transportation system that serves the San Bernardino Valley. Services include 27 routes including buses, bus rapid transit, and paratransit. Of the three Omnitrans bus routes that operate in the City, only one reaches the area with low educational outcome, and there is little to no transit service available within that northwest wing of the City. This may affect access to education, but the degree of inaccessibility portrayed by [Figure 7-20](#) may be misleading as there are few residences in the primarily industrial area north of the I-10.

Compared to the County as a whole, Redlands scores slightly higher in transportation metrics; however, the region as a whole scores low in transportation metrics. The AllTransit Performance score is measured on a scale from zero to ten, with ten being the highest score. Redlands scores a 6.0 on this scale, compared to the whole County, which scores a 4.4. The addition of three new Metrolink & Arrow passenger light rail stations for downtown, the Esri campus, and the University of Redlands will dramatically improve transit service and usage in [Redlands, and Redlands and](#) is expected to be a major factor and catalyst in the future growth and economic development of these areas and the entire City of Redlands via the proposed TVSP. The areas around each of the three new Metrolink & Arrow passenger light rail stations will feature and promote compact, urban, walkable mixed-use redevelopment of new housing, services, and employment opportunities that will form an attractive urban core and a full range of new housing options for all household types and incomes. The new investment and development will include new amenities, services, and businesses that will serve and improve the quality of life for existing and new neighborhoods, visitors, [employees](#), and residents of Redlands.

[San Bernardino County's public transportation system is Omnitrans, which services the San Bernardino Valley. Services include 27 routes including buses, bus rapid transit, and paratransit. Of the three Omnitrans bus routes that reach the City of Redlands, only one reaches the area with the highest percentage of people in the low to moderate income level and a sizeable Hispanic majority. Generally, transit routes follow east-west corridors along Lugonia Avenue and Citrus Avenue/Brookside Avenue/Barton Road. North-south transit is located along Orange Street/Cajon Street. Both these routes connect to downtown; however, these routes do not reach beyond these corridors to communities and first mile/last mile connectivity remains an ongoing issue. SBCTA recently completed a Station Access Plan to study connectivity in proximity to the train stations, and the City of Redlands recently completed a Sustainable Mobility Plan to study pedestrian and bicycle connectivity throughout the city including to the train and transit stations.](#)

[Tracts in the southwest portion of the City have higher percentages of disabled persons and are not served by public transit, except for along the Brookside Avenue/Barton Road corridor. Block groups with the highest percentages of non-White populations and female householders, as well as highest percentages of populations with low to moderate incomes, are located near transit corridors along Orange Street and Lugonia Avenue, yet first mile/last mile connectivity remains an ongoing issue.](#)

[The area with the worst job proximity also has the highest median income, so although they will have increased transportation costs in the form of necessary car ownership, this subset of the population will](#)

generally not be overly affected by the excess costs. Transit use is, long term, cheaper than automobile use, and walkable areas eliminate transportation costs all together.

The San Bernardino County Transportation Authority (SBCTA) recently completed construction of a new passenger rail line connecting Redlands to the Metrolink system and is establishing a new light rail system called the Arrow light rail, which is the catalyst for the proposed TVSP in Redlands. The project has constructed three new train stations in Redlands in areas of concentrated employment opportunity and activity. The stations are located adjacent to Esri's headquarters at Redlands Boulevard & New York Street, in the center of downtown at the historic Santa Fe Depot, and adjacent to the University of Redlands campus at University Street & Park Avenue. The new Metrolink/ Arrow light rail stations will create direct and efficient connections to major regional destinations such as the San Bernardino Metrolink station, which connects to downtown Los Angeles, Riverside, and Santa Ana. The Metrolink/ Arrow light rail is expected to begin service in 2022.

The public requested to SBCTA transit accessibility and housing near rail stations, extending beyond the university. This desire for increased transit accessibility also made evident a desire for more density. To maximize ridership on the Metrolink/ Arrow light rail service, the City is updating land uses around the planned stations. The implementation of the TVSP around the university, downtown, and Esri campus will significantly increase housing and employment opportunities in these areas. Importantly, the stations and the TVSP will contribute to the revitalization of downtown and increase investment and resources in the tract classified as having patterns of high segregation and poverty. Much of the land around the three station sites is either vacant or underutilized, and primed for transit-oriented infill development.

The goal of the TVSP is to transform vacant and underutilized parcels within one-quarter mile of each station into a lively, transit-oriented neighborhoods. Tree-lined streets and sidewalks provide safe and convenient access to the station, the Esri campus, and downtown. Greens and neighborhood parks create open, accessible, fresh-air spaces for both residents from surrounding multifamily buildings as well as nearby office workers. Buildings accommodate housing for a variety of income levels and family types, including parents with children and seniors. It will enable employees of Esri and other local businesses and institutions to live in Redlands. The downtown station area is intended to be a walkable mixed-use district of pedestrian-scaled blocks, beautiful tree-lined streets with comfortable seating and exterior dining and inviting squares and plazas. Surface parking lots are infilled with urban buildings that frame the sidewalks. The university station area is intended to be the "Town" counterpart to the university's "gown" with amenities for students, faculty, and staff to live, work, shop, dine, and study.

Anticipation of the TVSP and transit stations has already led to significant investment by downtown property owners with the development of commercial retail/dining and professional office uses in the immediate area around the downtown station. These recent developments were designed with an emphasis on pedestrian amenities, walkability and connectivity, and enhanced landscaping. A four-level parking garage is also currently under construction adjacent to the downtown Metrolink platform to enable a "park once" model for downtown and eliminate the need to drive from destination to destination in the immediate area.

7.3.5.2 Disparities in Access to Opportunity for Persons with Disabilities

The City of Redlands permits transitional and supportive housing in all zones that allow residential use, with no restrictions other than those imposed on similar residential uses in the same zone.

7.3.5.3 Findings

Disparities in access to opportunities across Redlands mirrors patterns shown in the integration and segregation analysis. The central areas of the City include tracts that have lower access to opportunity than the rest of the City, with one census tract in the high segregation and poverty area. The downtown area has the highest CalEnviroScreen score. The central areas of the City are likely to see improved access to transit with the construction of three train stops, and significant investment and opportunity through the TVSP. In Redlands, higher opportunity areas (as defined by the TCAC) correlate strongly with higher income populations. Conversely, areas with lower access to opportunities tend to have lower income and larger minority populations. There are no clear patterns showing access issues for populations with disabilities.

Contributing factors to fair housing issues pertaining to access to opportunity include lower environmental quality in census tracts and community opposition to new development. These factors are addressed through Program 1.5-8 Residential Development in High Opportunity Area, 1.1-2 TVSP, Program 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs and ADU Outreach in Program 1.6-1.

7.3.6 Disproportionate Housing Needs

Disproportionate housing needs are analyzed by assessing substandard housing by tenure, race, household size, and elderly households.

7.3.6.1 Substandard Housing

A household is considered to be substandard or have a housing problem if the home has one or more of the following housing problems:

- Housing unit lacks complete kitchen facilities
- Housing unit lacks complete plumbing facilities
- Household is overcrowded (more than 1 person per room including living and dining rooms but not including the bathroom or kitchen)
- Household is cost burdened (monthly housing costs including utilities exceeds 30% of the monthly household income)

Table 7-7 ~~Table~~ reveals the trends relating to housing problems and race. Compared to the overall population of the City of Redlands, the percentage of White or Asian households with housing problems is much lower than the percentage of total White or Asian households in the City. In Contrast, the percentage of Black, Native American, and Pacific Islander households with housing problems is

approximately double the percentage that would be expected by their proportions of the overall population, meaning that these races are disproportionately experiencing at least one of the four housing problems. The percentage of Hispanics or Latinos with housing problems is comparable to the overall percentage that the Hispanic population makes up of the City's total population.

The same trends extend to the County level: White and Asian households make up proportionately fewer households with housing problems than their overall population. However, Countywide, this trend also applies to the Hispanic, Pacific Islander and Native American populations, unlike in the City of Redlands. The City's trend of Black households making up proportionately more households with housing problems population than their overall population also extends to the County level.

TABLE 7-77-7: ANY HOUSING PROBLEM BY TENURE AND RACE

| | White | Black | Asian | Am Indian | Pac Islander | Other | All | Hispanic |
|---|--------------|--------------|-------------|-------------|--------------|--------------|---------------|--------------|
| Redlands Total with Housing Problems | 4,650 | 700 | 530 | 55 | 40 | 170 | 8,705 | 2,860 |
| | 50.0% | 8.0% | 6.1% | 0.6% | 0.5% | 2.0% | 100.0% | 32.9% |
| Owner-Occupied | 2,080 | 120 | 250 | 15 | 15 | 60 | 3,700 | 1,160 |
| | 23.9% | 1.4% | 2.9% | 0.2% | 0.2% | 0.7% | 42.6% | 13.3% |
| Renter-Occupied | 2,570 | 580 | 295 | 40 | 25 | 110 | 5,320 | 1,700 |
| | 29.5% | 6.7% | 3.4% | 0.5% | 0.3% | 1.3% | 61.0% | 19.5% |
| All Households with or without Housing Problems | 28,392 | 3,870 | 5,729 | 332 | 147 | 5,346 | 71,830 | 23,261 |
| | 39.9% | 5.4% | 8.1% | 0.5% | 0.2% | 7.5% | 100.0% | 32.7% |
| San Bernardino County Total with Housing Problems | 86,325 | 30,710 | 18,315 | 1,060 | 629 | 6,385 | 281,885 | 138,465 |
| | 30.6% | 10.9% | 6.5% | 0.4% | 0.2% | 2.3% | 100.0% | 49.1% |
| Owner-Occupied | 46,885 | 8,215 | 11,325 | 575 | 240 | 2,180 | 129,495 | 60,075 |
| | 16.6% | 2.9% | 4.0% | 0.2% | 0.1% | 0.8% | 45.9% | 21.3% |
| Renter-Occupied | 39,440 | 22,495 | 6,990 | 485 | 389 | 4,205 | 152,390 | 78,390 |
| | 14.0% | 8.0% | 2.5% | 0.2% | 0.1% | 1.5% | 54.1% | 27.8% |
| All Households with or without Housing Problems | 169,364 | 179,292 | 154,332 | 17,782 | 6,838 | 368,600 | 2,149,021 | 1,145,874 |
| | 7.9% | 8.3% | 7.2% | 0.8% | 0.3% | 17.2% | 100.0% | 53.3% |

Source: HUD CHAS 2013-2017. Note: data excludes households with two or more races

An elderly household is a household where either the head of the household is over 62 years of age or there are two people over 62 years of age in the household. In the City of Redlands, elderly households make up 18% of the overall population, but 34% of households with housing problems; Countywide, elderly households make up 12% of the total population, but 28% of the households with housing problems. This disproportionate representation, shown in Table 7-8Table, may be due to how many elderly households may have acquired their home when employed and now are living on a fixed income

(e.g., salary from Social Security), thus creating a cost burden that does not leave enough excess funding to repair housing problems. Additionally, if elderly people acquired their home a long time ago, the older building may have more need of repair compared to a home more recently acquired by someone younger with more flexible income. Aging in place assistance may help remedy this imbalance.

Large households are considered households with three or more children, whether there is one present parent or two, but are often also measured as households with over five people, regardless of the number of children. The table below reveals that despite large households making up only 7% of the overall population in the City of Redlands, they make up 18% of the households with housing problems. Countywide, large households make up 10% of the population, but 26% of the households with housing problems. Large households may have increased non-housing costs such as paying for other basic needs like food, day care, insurance, health costs, transportation, and utilities which results in less funding available for housing repairs.

TABLE 7-87-8: HOUSING PROBLEMS FOR ELDERLY AND LARGE HOUSEHOLDS BY TENURE

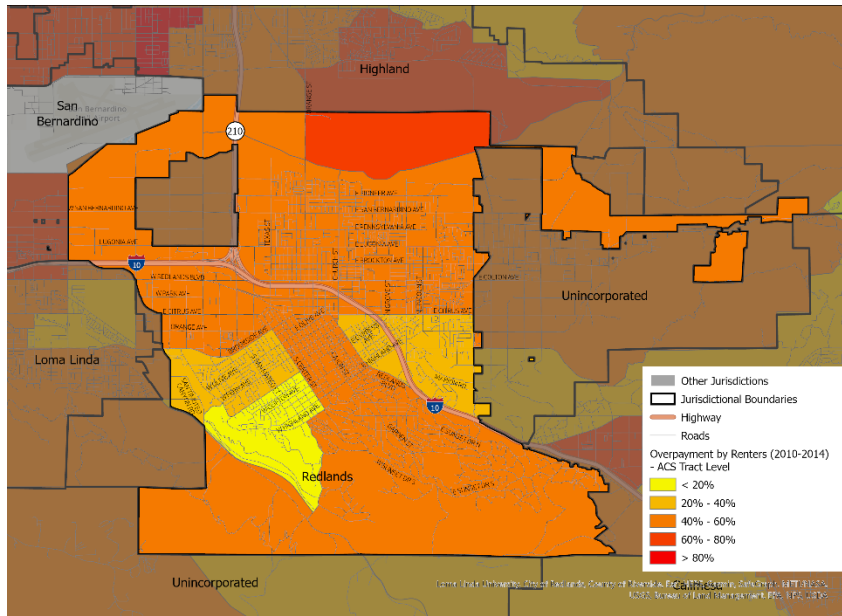
| | Elderly Renters with Housing Problem | Elderly Owners with Housing Problem | All Elderly Households with Housing Problems | Total Elderly Households | Large HH Renters with Housing Problem | Large HH Owners with Housing Problem | All Large Households with Housing Problems | Total Large Households |
|--------|--------------------------------------|-------------------------------------|--|--------------------------|---------------------------------------|--------------------------------------|--|------------------------|
| City | 1,170 | 1,780 | 2,950 | 12,670 | 985 | 585 | 1,570 | 5,084 |
| County | 28,670 | 50,175 | 78,845 | 263,060 | 40,850 | 33,005 | 73,855 | 220,240 |

Source: HUD CHAS 2013-2017.

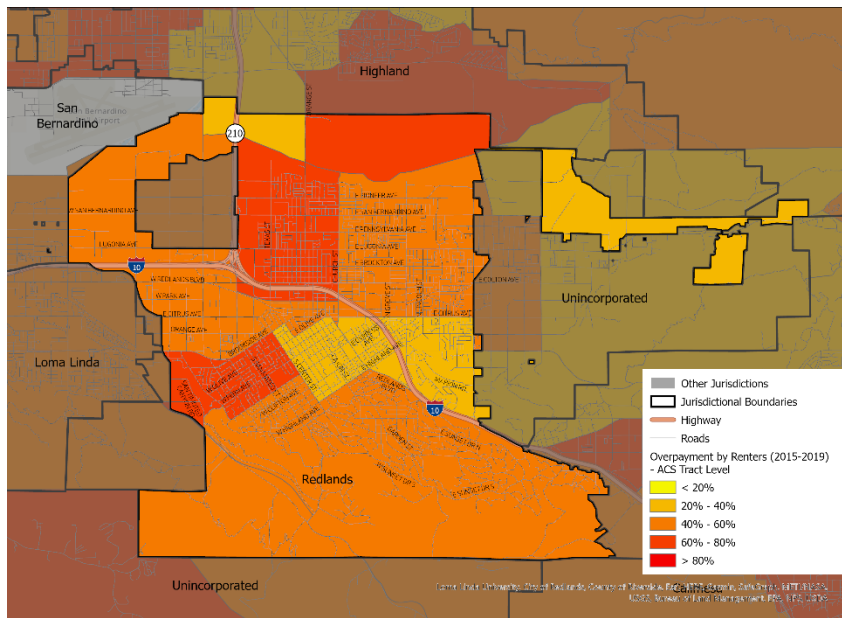
7.3.6.2 Cost Burden

Households are considered cost burdened if they spend more than 30% of their income on household costs, including utilities. Figure 7-28 displays the percentage of renter households that are experiencing a cost burden by census tract from 2010-2014 and 2015-2019. There is no tract in the City where less than 20% of renters are cost burdened. There is only one tract that is fully in the City where less than 40% of renters are cost burdened. Most tracts have more than 40% of renters experiencing a cost burden. The percentage of renters who are cost burdened increased from 2010-2014 in the southeast and downtown areas of the City. The percentage of cost burdened renter households decreased from 40-60% to 20-40% in three census tracts in the northeast, central and northwestern areas.

FIGURE 7-28: OVERPAYMENT BY RENTERS, 2010-2014 AND 2015-2019



Overpayment by Renters, 2010-2014

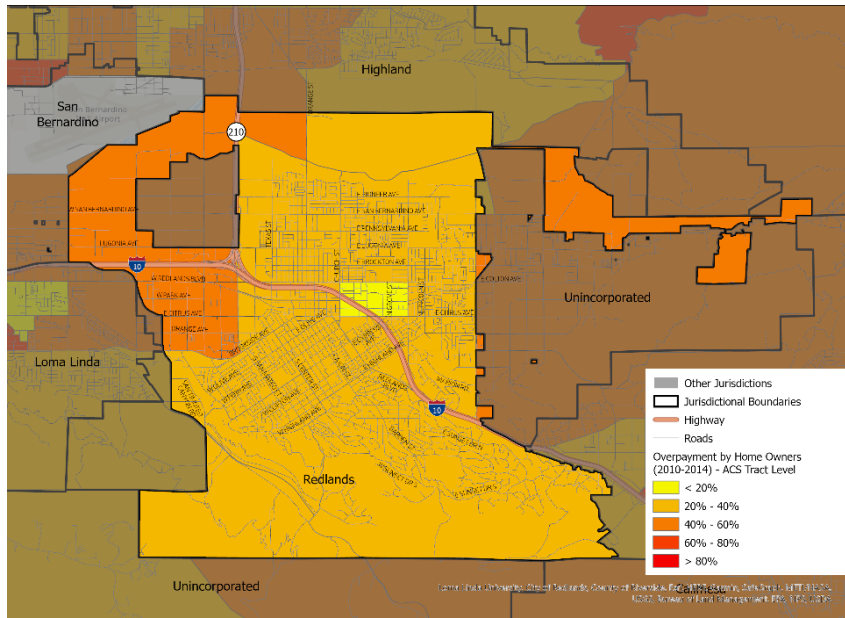


Overpayment by Renters, 2015-2019

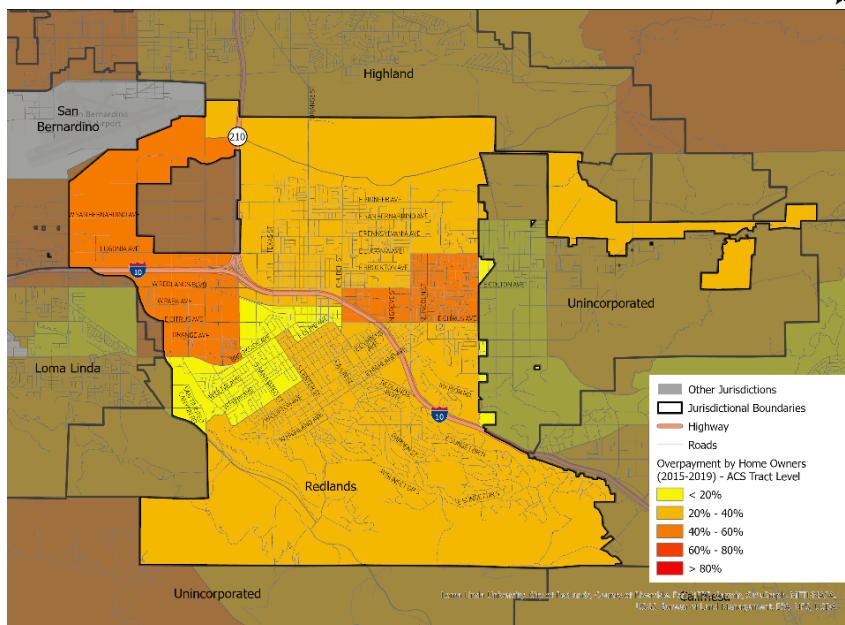
Source: HCD AFFH Mapping Tool.

Figure 7-29 displays the percentage of homeowners that are experiencing a cost burden by census tract from 2010-2014 and 2015-2019. A significantly smaller number of homeowners experience cost burden compared to renters. There are no tracts in the City where over 60% of homeowners experience a cost burden, and only three tracts in the City fall in the 40%-60% range. A few tracts in the western part of the City saw a decrease in cost-burdened homeowners over time.

FIGURE 7-29: OVERPAYMENT BY HOMEOWNERS, 2010-2014 AND 2015-2019



Overpayment by Homeowners, 2010-2014



Overpayment by Homeowners, 2015-2019

Source: HCD AFFH Mapping Tool.

Table 7-9 Table reveals the trends relating to cost burden and race. Compared to the overall population of the City of Redlands, the percentage of households with cost burden that are White or Asian is lower than the percentage of total households that are White or Asian in the City. However, the percentage of households with cost burden that are Black, Native American, Hispanic, and Pacific Islander is much larger than the percentage of those ethnicities that comprise the overall population, meaning that these races are disproportionately experiencing cost burden and housing costs requiring too much of their total income.

TABLE 7-9-9: COST BURDEN BY TENURE AND RACE

| | White | Black | Asian | Am Ind | Pac Islander | Other | All | Hispanic |
|--|--------------|--------------|--------------|-------------|--------------|--------------|---------------|--------------|
| Redlands Total with Cost Burden | 4,390 | 655 | 465 | 55 | 40 | 165 | 8,210 | 2,440 |
| | 53.5% | 8.0% | 5.7% | 0.7% | 0.5% | 2.0% | 100.0% | 29.7% |
| Owner-Occupied | 1,945 | 100 | 215 | 15 | 15 | 65 | 3,340 | 985 |
| | 23.7% | 1.2% | 2.6% | 0.2% | 0.2% | 0.8% | 40.7% | 12.0% |
| Renter-Occupied | 2,445 | 555 | 250 | 40 | 25 | 100 | 4,870 | 1,455 |
| | 29.8% | 6.8% | 3.1% | 0.5% | 0.3% | 1.2% | 59.3% | 17.7% |
| All Households | 28,392 | 3,870 | 5,729 | 332 | 147 | 5,346 | 71,830 | 23,261 |
| | 39.9% | 5.4% | 8.1% | 0.5% | 0.2% | 7.5% | 100.0% | 32.7% |
| San Bernardino County Total with Cost Burden | 81,845 | 29,200 | 16,335 | 925 | 490 | 1,969 | 132,214 | 1,450 |
| | 61.9% | 22.1% | 12.4% | 0.7% | 0.4% | 1.5% | 100.0% | 1.1% |
| Owner-Occupied | 44,780 | 7,845 | 10,375 | 490 | 155 | 1,965 | 66,195 | 585 |
| | 33.9% | 5.9% | 7.9% | 0.4% | 11.7% | 1.5% | 50.1% | 0.4% |
| Renter-Occupied | 37,065 | 21,355 | 5,960 | 435 | 335 | 3,915 | 69,930 | 865 |
| | 28.0% | 16.2% | 4.5% | 0.3% | 0.3% | 3.0% | 49.9% | 0.7% |
| All Households | 169,364 | 179,292 | 154,332 | 17,782 | 6,838 | 368,600 | 2,149,021 | 1,145,874 |
| | 7.9% | 8.3% | 7.2% | 0.8% | 0.3% | 17.2% | 100.0% | 53.3% |

Source: HUD CHAS 2013-2017. Note: data excludes households with two or more races

At the County level, the percentage of households with cost burden that are White, Native American, or Pacific Islander is comparable with the percentage of total households that are White or Native American in the County, revealing a higher proportion of White households with cost burden and a lower proportion of Native American or Pacific Islander households with cost burden than in the City of Redlands. Like the City, the County has a much larger percentage of cost-burdened Black households than would be expected by their population. Unlike the City of Redlands, where Asian households make up proportionately less of the cost-burdened population than the overall population, at the San Bernardino County level, they make up almost twice the proportion and are overwhelmingly disproportionately cost burdened. Also different

from Redlands is the Hispanic population, which makes up a large overall proportion of the population in the County but a very small proportion of cost-burdened households.

An elderly household is a household where either the head of the household is over 62 years of age or there are two people over 62 years of age in the household. In the City of Redlands, elderly households make up 18% of the overall population, but 27% of households with cost burden; Countywide, elderly households make up 12% of the total population, but 41% of the households with cost burden. This disproportionate representation, shown in Table , may be due to how many elderly households may have acquired their home when employed and now are living on a fixed salary (e.g., from Social Security), thus creating a cost burden.

Large households are considered households with three or more children, whether there is one present parent or two, but are often also measured as households with over five people. The table below reveals that despite large households making up only 7% of the overall population in the City of Redlands, they make up 22% of the households with cost burden. County-wide, large households make up 10% of the population, but 33% of the households with cost burden. Large households may need a larger home to accommodate the number of people in the family, and because larger-sized homes may have higher costs (rent/mortgage, utilities, etc.), it may take more of a person's income to maintain, thus creating a cost burden.

TABLE 7-107-10: COST BURDEN FOR ELDERLY AND LARGE HOUSEHOLDS BY TENURE

| With Housing Problem | Elderly | Large HH | All Renter | Elderly | Large HH | All Owners | All HH |
|----------------------|---------|----------|------------|---------|----------|------------|--------|
| City | 975 | 629 | 1,604 | 1,207 | 280 | 1,487 | 3,091 |
| County | 19,895 | 25,515 | 45,410 | 33,745 | 18,420 | 52,165 | 97,575 |

Source: HUD CHAS 2013-2017.

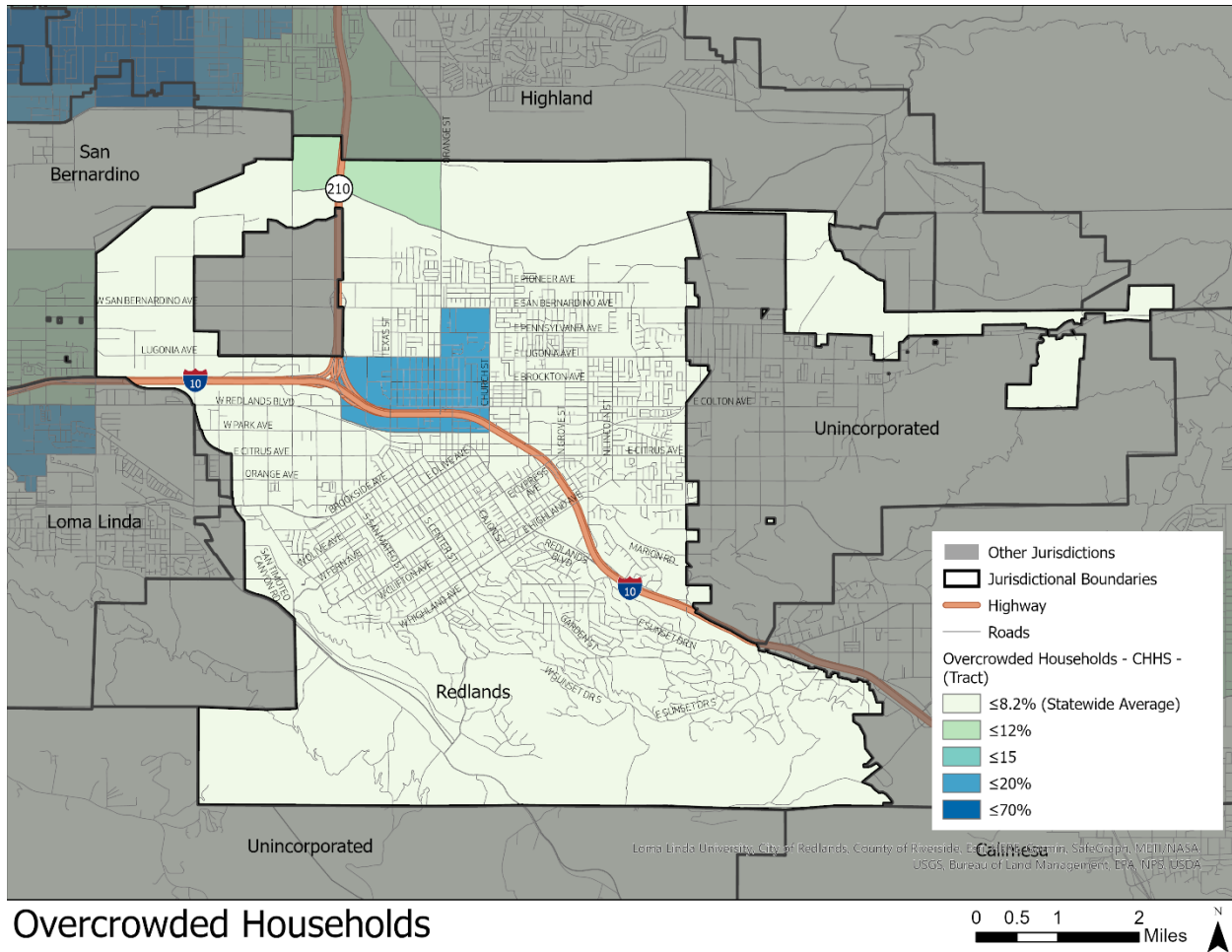
7.3.6.3 Overcrowding

A household is considered overcrowded if there is more than one person per room, including dining and living rooms but excluding bathroom and kitchen. Overcrowding is considered one of the four major identified housing problems by HUD.

In the City of Redlands, the area with the most severe overcrowding corresponds with the tract with high segregation and poverty, as shown in Figure 7-30 ~~Figure~~, which follows trends in housing choice voucher usage, less economic opportunity, and a high percentage of the population in low to moderate income levels. This area is also a predominantly Hispanic community. While it may be assumed that overcrowded households would correlate with families, this area has less children living in married couple households compared to the rest of the City, and a higher quantity of people living alone. It does, however, have a higher number of children in female- or single-parent headed households.

Per the 5th Cycle Housing Element, there is a history of low-income households being more overcrowded due to scarce housing resources, which is consistent with what is known of the identified area. In the San Bernardino County region as a whole, areas of overcrowding are isolated, but continue in areas with similar characteristics to that in Redlands, such as the areas of older downtown housing in other cities and the industrial area in the City of San Bernardino surrounding the San Bernardino Airport.

FIGURE 7-30: DISTRIBUTION OF OVERCROWDED HOUSEHOLDS, 2010, REDLANDS



Source: HCD AFFH Mapping Tool.

7.3.6.4 Homelessness

Persons experiencing homelessness and unhoused individuals are groups who experience disproportionate housing needs. The San Bernardino County Homeless Partnership, in collaboration with the San Bernardino County Office of Homeless Services and the Institute for Urban Initiatives, conducts an annual count of the population experiencing homelessness, known as the Point In Time Count (PITC). Table displays the PITC for Redlands for the years 2013 and 2020 and the change over time. The 2020 PITC accounted for 186 individuals experiencing homelessness in Redlands. From 2013 to 2020 homelessness tripled in the City, increasing from 62 to 186 individuals. Concentrations of the homeless population are in the downtown area where issues like overcrowding and overpayment are prevalent.

TABLE 7-11: CHANGE IN POPULATION EXPERIENCING HOMELESSNESS, 2013 - 2020

| Characteristic | 2013 | 2020 | % Change |
|--|------|------|----------|
| Total Homeless | 62 | 186 | 300% |
| Sheltered | 15 | 45 | 300% |
| Unsheltered | 47 | 141 | 300% |
| Transitional Housing | 1 | - | -100% |
| | | | |
| Male | 36 | 71 | 81% |
| Female | 9 | 22 | 211% |
| | | | |
| Chronic Homeless | 9 | 59 | 655% |
| Families (Including Chronically Homeless Families) | 1 | - | - |
| Persons with Mental Health Problems | 13 | 30 | 230% |
| White, non-Hispanic | 27 | 52 | 192% |
| Black, non-Hispanic | 5 | 12 | 240% |
| American Indian and Alaskan Native, non-Hispanic | 4 | 2 | -50% |
| Asian, non-Hispanic | - | 1 | - |
| Native Hawaiian and Other Pacific Islander, non-Hispanic | - | - | - |
| Multiple Races or Other | 3 | 26 | 867% |
| Don't Know/Refused | - | - | - |
| Hispanic/Latino | 6 | 26 | 433% |
| | | | |

Source: San Bernardino County Homeless Partnership 2013 and 2019 Point In Time Counts.

Table 7-12 displays the 2020 PITC for Redlands in comparison with neighboring jurisdictions and the whole of San Bernardino County. The City of San Bernardino has a significantly higher population experiencing homelessness than other cities in the region at 1,056. Redlands has the second highest count. The 2020 PITC report notes that two-thirds of the population experiencing homelessness were counted in six cities in the County: Fontana, Ontario, Redlands, Rialto, San Bernardino and Victorville.²⁷

²⁷ 2019 San Bernardino County Homelessness County and Subpopulation Survey Final Report; <https://wp.sbcounty.gov/dbh/sbchp/wp-content/uploads/sites/2/2019/05/2019-homeless-count-and-survey-report.pdf>.

TABLE 7-12: REGIONAL POINT IN TIME COUNT, 2019

| Jurisdiction | Sheltered | Unsheltered | Total |
|------------------------|-----------|-------------|-------|
| Redlands | 45 | 141 | 186 |
| Highland | 0 | 78 | 78 |
| Loma Linda | 24 | 27 | 51 |
| City of San Bernardino | 233 | 823 | 1,056 |
| Yucaipa | 4 | 13 | 17 |
| San Bernardino County | 735 | 2,390 | 3,125 |

Source: San Bernardino Partnership 2019 Homelessness Count and Subpopulation Survey Final Report.

7.3.6.5 Displacement Risk

The Urban Displacement Project at University of California, Berkeley developed a map of communities where residents may be particularly vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost, known as sensitive communities.²⁸ Sensitive communities are defined based on the following set of criteria:

- The share of very low-income residents is above 20%.

The tract must also meet two of the following criteria:

- The share of renters is above 40%.
- The share of people of color is above 50%.
- The share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median.
- The areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as:
 - The percentage change in rent above county median for rent increases OR
 - The difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Figure 7-31 displays the areas of the City determined to be sensitive to displacement as determined by the Urban Displacement Project. It includes the northwestern and central census tracts. There is very little housing in the western region of the City north of the I-10 freeway and west of Highway 210 and no land there is zoned for residential use.

The citizen anti-growth initiatives in the 1970s, 1980s, and 1990s restricted development and placed a series of regulatory and procedural burdens on multifamily housing. It is unknown the extent to which this discouraged and deterred development in Redlands. Few new higher-density multifamily

²⁸ UCB Sensitive Communities Project.

developments have been approved in Redlands in the past three decades, with the exception of Luxview Apartments (in 2019) in the southwest region of the city, the Liberty Lane affordable housing project in the central census tract (2018), and Casa Loma Apartments (in 2020) near the university in the eastern region of the city. The large capital investment in the three new Metrolink passenger rail stations and the smart growth compact mixed-use development around each station are expected to provide more multifamily housing and higher-density housing options and transform the areas over the next 10 to 20 years. There is development interest for increased density near transit stops, as well as for housing to be built in underserved communities so people may continue to live in their community and not have to leave to gain access to affordable housing.

Displacement from Transit Oriented Development

Fortunately, the largely vacant and underutilized lands around the train stations will permit significant infill and redevelopment with minimal displacement of existing residents. Redevelopment of residential sites (if any) will require advanced notification of tenants, and right of first refusal to occupy replacement of affordable units. Residents with housing choice vouchers will be able to relocate to other units in the area. The planned urban form will increase housing, services, ~~recreation~~recreation, and employment opportunities in the area. As such, any displacement risk with the development of new housing and with the selection of RHNA sites is anticipated to be minimized. In recent cases where some single-family residences (Ruiz Street) have been replaced with non-residential development, developers entered negotiations with owner-occupied property owners. These negotiations resulted in market-competitive cash offers that enabled residents to relocate without hardship.

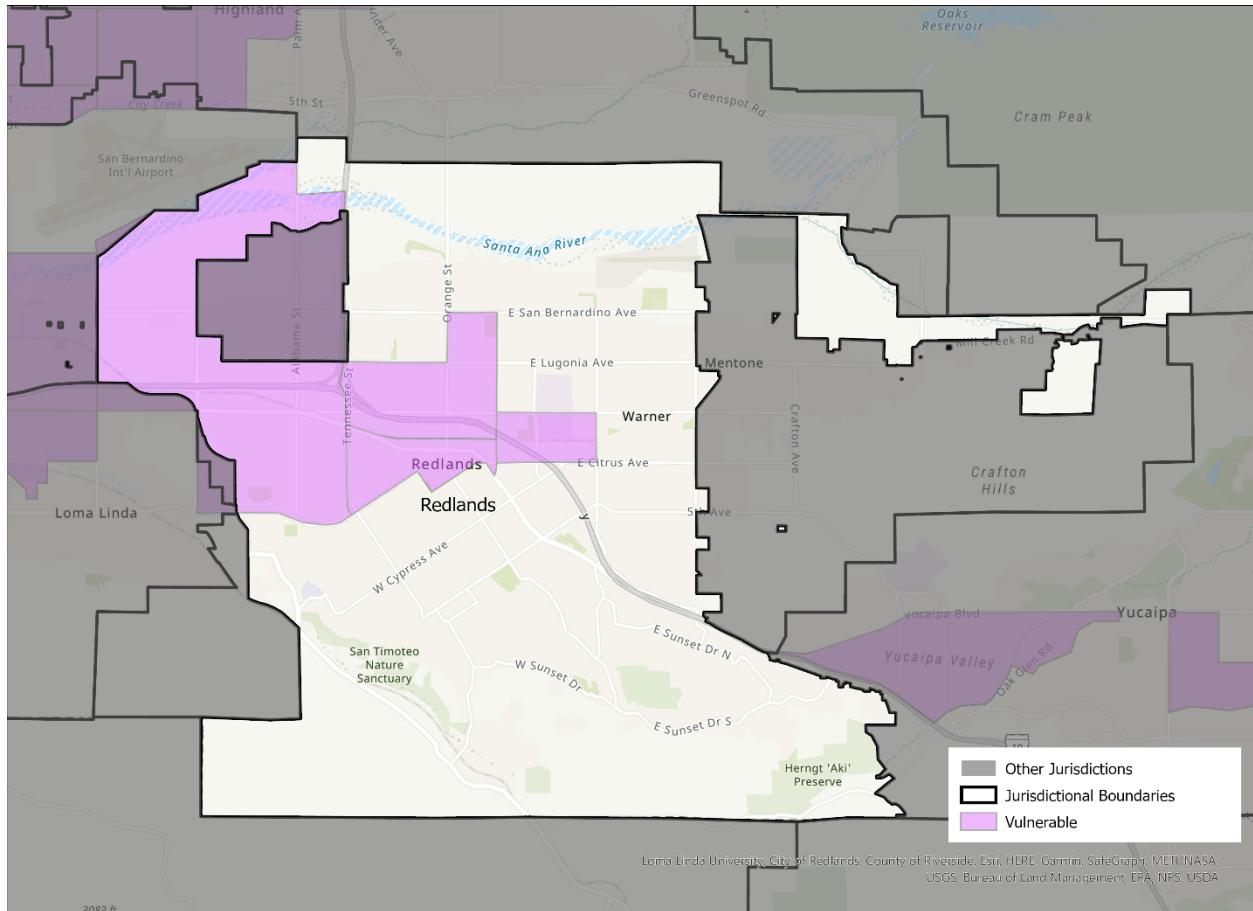
Areas north of I-10 zoned R-1 and within the ½ mile of the downtown train station has been excluded from rezoning under the TVSP with the intent of not inducing displacement. Only commercially zoned parcels will undergo zone/development standard updates under the TVSP. Additionally, to take further steps against displacement, the City has included programs addressing displacement such as Program 1.2-20 Extending Affordability Covenant terms from 55 to 99 ~~years, and~~ years and Program 1.3-9 facilitating the Tenant Protection Act (2019).

Implementation of the TVSP will also address overlapping issues with access to opportunity and disproportionate housing needs in that the TVSP will facilitate the creation of new housing, jobs, resources, and means of transportation within an area of low displacement risk.

Displacement from Environmental Hazards

Much of the TVSP area is within a 100-year flood zone. The City's municipal code provides standards for building within the flood plain that includes standards for both new and re-purposed buildings. No special approval or entitlement is needed to construct in the flood zone, only that the building pad be elevated at least 2 feet above the 100-year flood elevation. Because any new or repurposed building would be constructed above the flood elevation, the risk of displacement by flood is no greater than for dwelling units outside the flood zone.

FIGURE 7-31: COMMUNITIES SENSITIVE TO DISPLACEMENT, 2017, REDLANDS



Communities Sensitive to Displacement

Source: HCD AFFH Mapping Tool.

7.3.6.6 Findings

Trends in disproportionate housing needs show the following:

- Renters experienced greater housing cost burdens than homeowners
- Overcrowding above the State average occurs downtown, including the same census tract that is identified as high segregation and poverty
- Large households are the most likely to experience housing problems

Contributing factors to fair housing issues pertaining to disproportionate housing needs include lack of availability of affordable units for low-income households and historic land use and zoning practices. These will be addressed by the TVSP. Promoting the plan to property owners and affordable and market rate housing developers can help increase housing that will be built near the new transit stops. The City will also fund three beds as stated in Program 1.3-8 Homeless Assistance Program.

7.3.7 Other Contributing Factors

Other contributions that effect the accumulation of wealth and access to resources include historic disinvestment, lack of infrastructure improvements, [ballot growth measures](#), and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

Environmental Justice

The City has several industrial uses throughout and has identified zoning for these uses. The organization of the zoning pattern generally keeps industrial type uses separated from residential uses. Where industrial and residential are proximate, the City limits industrial activities to “light industrial” uses in order to limit environmental impacts on neighboring zones.

The establishment of I-10 has created a corridor through the middle of the City where neighboring areas are affected by pollution such as diesel particulate matter. The City implements best practices when reviewing land use developments within 500’ of I-10 to limit pollution exposure. It does this by conditioning projects to install HVAC systems that have the ability to filter these pollutants. Where possible, noise barriers have been installed along 1-10 to shield residences from freeway noise. While noise barriers are typically installed and maintained by CalTrans, the City has supported private development projects that seek to beautify and enhance freeway right-of-way such as the Packinghouse District and the Orange Street I-10 east bound off ramp.

History of Growth Management Land Use Measures

The City’s first growth management initiative was Proposition R that Redlands voters passed in 1978. The Growth Management Ordinance is located in Title 19 of the Redlands Municipal Code, and Code and was included in direct response to the ballot measures.

Proposition R was amended by Measure N (a zoning ordinance) in 1987; this policy restricts the development of residential dwelling units to 400 units a year within the city, and the extension of utilities

to 150 units per year outside the existing city limits (within the Sphere of Influence, and therefore in the County of San Bernardino's jurisdiction). Of the 400 units within the city, 50 are, by resolution, reserved for single family homes, duplexes, triplexes and four-plexes on existing lots; the remainder are allocated on a point system (adopted as Ordinance No. 2036), which emphasizes design amenities. However, as noted in the State Law Preemption section below, these provisions have been rendered null and void while SB 330 is in effect. The City Council adopted Resolution 8082 in 2020 suspending enforcement of the annual building permit limit as long as SB330 is in effect.

Measure U, adopted by the voters in 1997, further articulated growth management policies. This General Plan Amendment reinforced and modified certain provisions of Measure N, adopted Principles of Managed Growth, and reduced the development density of San Timoteo and Live Oak canyons by creating a new land use category: Resource Preservation. This particular aspect of Measure U has a negligible effect on the ability of the City to accommodate future residential development because it concerns an area of the city with steep hillsides, natural resources, no sewer service and limited utility infrastructure, and other conditions that would limit the development potential of this part of Redlands, regardless of governmental controls.

In addition, under Measure U, no land designated by the General Plan as Urban Reserve as of June 1, 1987, is to be re-designated for a higher density than the R-E designation as the same existed on June 1, 1987 unless specified findings are made by a four-fifths vote of the City Council.

Measure U limits high-density residential land uses to 27 dwelling units per gross acre (du/ac) of development and requires a City Council supermajority (4/5) to approve any proposed developments in excess of 18 du/ac, or with heights in excess of 2.5 stories or 35 feet. Additionally, Measure U specifies required findings that the developments provide "substantial and overriding economic or social benefits to the City."

During the eight years of the RHNA projection period (2021 to 2029), 3,516 units would need to be accommodated, or about 440 units per year for Redlands to meet its RHNA. This development rate would not be feasible with the Measure U limit of 400 units per year within city limits (plus unlimited additional SRO and congregate care facilities). However, the City Council adopted Resolution No. 8082 to suspend the Residential Development Allocation program while SB 330 is in effect; therefore, during the time that SB 330 is in effect (through at least 2030), there is no 400-unit limit or competitive evaluation system. Thus, Resolution No. 8082 eliminates any impact on the City's ability to meet its RHNA caused by Measure U or the Residential Development Allocation program.

The Redlands City Council took steps to meet the City's allocation by determining that congregate care and single room occupancy (SRO) units will not count against Measure U's limitations as long as group dining facilities and a meal program are provided. City staff has defined SRO units as one-room apartments without kitchen facilities although an SRO ordinance has not been adopted by the City at the time of preparation of this Element

Measure U, although not demonstrated with previous project approvals, could in theory potentially restrict the City's ability to meet its housing needs obligations, and restricts multi-family housing development through the requirement of a 4/5 vote of the City Council for densities above 18 du/ac or

housing products greater than two and half stories in height. Additionally, the 75 percent single family to 25 percent multi-family ratio identified in the City’s General Plan via Measure U would, in theory, preclude the City from meeting its RHNA. Therefore, during the time that SB 330 is in effect (likely through 2030), the City cannot the 75/25 ratio target, so as to eliminate any impact on the City’s ability to meet its RHNA.

Measure U provides for an exemption for development “directly related” to the three rail stations being developed and scheduled to open in Redlands in 2022: the New York Street station near the ESRI campus which is the City’s largest employer; the downtown station; and the University of Redlands station. If a development project is determined to be exempt from Measure U, then the development is not subject to the aforementioned requirements. This exemption process includes a determination by the City Council that a proposed development is “directly related” to the rail station. In making this determination, the City Council has utilized the following two criteria:

- The project site is located within one-quarter mile of a transit station and a clear pedestrian route is available from the project site to the transit station; and
- The project provides residential units at a density of a minimum of 20 units per acre.

The City Council has recently approved exemptions to Measure U for three residential projects in the downtown that will provide over 950 residential units.

The growth management initiatives may have played a role in the manner and extent of housing development in the City which has generally resulted in a furthering of suburban land use patterns with more expensive single-family Planned Residential Development being the primary housing product being developed during the 5th Cycle. Even so, the City has recently seen renewed interest in higher density housing production and is operating within the limits of these voter approved measures to allow taller and more dense housing in various parts of the City.

Measure U and the City’s growth management voter initiatives are more fully discussed in Section 4.1 – Governmental Constraints.

Spatial Patterns of Segregation

There is no indication of historic redlining in ~~Redlands~~Redlands, and none is shown on the AFFH data viewer tool.²⁹ However, records from the County Recorder of San Bernardino County show the use of racially restrictive covenants in the City until the 1940s in southern Redlands near the Country Club. The use of racially restrictive covenants shaped patterns of segregation and integration across Redlands, limiting some areas to White only residents.

Additionally, physical barriers were inadvertently created between North Redlands (former Lugonia Colony) and South Redlands (former Redlands Colony) by first the Zanja water course, followed by the Santa Fe Railroad, and most dramatically by Interstate 10³⁰. This division, which initially began between rival colonies attempting incorporation, has played out over the decades with a perceived lack of

²⁹ California HCD AFFH Data Viewer Tool. Redlining Grade Layer.

³⁰ *Little Racial Strife Seen*, Daily News. August 28, 2017. <https://www.dailynews.com/2011/01/16/little-racial-strife-seen/>

infrastructure and investment in North Redlands³¹. An inadvertent exacerbation came about in the latter 1950s when the police and fire departments for service purposes divided the city up and simply replaced Lugonia with “Northside”.³² The Report on Redlands Community Vision³³ contains a section on the “north side” in Appendix A which summarizes outreach and engagement feedback. The report documented “community members can make complaints at the commission meetings – sometimes related to north-vs.-south division in the city. Before city developed, there were really two cities. There was a perception that poorer people live on north side. The cultural mix on the north side has historically been different, and there are issues dating back to days of segregation. The Human Relations Commission works to educate people on these issues, and build more unity and acceptance. In recent years, the City has tried to have as much public access to planning as possible to help address this rift.” The report goes on to document comments by residents of the need for improved infrastructure and dedicated resources such as a library and public computer access. The City’s Historic Context Statement offers additional insight to early divisions between then Lugonia and Redlands colonies, quoting a local historian “It seems incredible to us now that there should have been so much jealousy and ill-feeling between Lugonia and Redlands. For some time, they felt that they were two separate towns and the section on Orange Street between the zanja and Pearl Avenue was called “the link.” It was all natural enough. Lugonia was well established with many attractive features and it was hard to see the trend in population and business moving so definitely away from them. On the other hand, Redlands, with youthful enthusiasm was out to capture the business center, the tourists, and everything else it could.”³⁴ Over the years this sentiment has dwindled and both portions of the City have become more diverse. Through vision planning and comprehensive planning efforts, the City has made great efforts to direct resources where they are needed.

Portions of this area are included in the TVSP. The City is working to increase infrastructure investment and redevelopment in this area with the TVSP.

In 2015, the City interviewed business owners at the prominent North Redlands intersection of Orange Street and Colton Avenue (during the I-10 on-ramp/off-ramp beautification project) to ascertain what actions could improve the immediate area. Most respondents indicated the need for police surveillance cameras at the intersection to enhance public safety, and the City successfully coordinated with Caltrans to install additional cameras. There are three primary underpasses that connect North and South Redlands under elevated portions of I-10 (at Sixth St., Orange St., and Eureka St.), and the City has cleaned and revitalized each of them with new lighting, paint, and mural installations to signify the connection and promote the safe passage of pedestrian traffic. In addition, the draft TVSP includes the corridors along Colton Avenue (north and east of I-10) and North Orange Street (from I-10 to Lugonia Avenue) to improve and enhance the connectivity and aesthetic of North Redlands to the downtown area.

³¹ Report on Redlands Community Vision, 2006. Dyett and Bhatia. https://www.cityofredlands.org/sites/main/files/file-attachments/report-on-community-vision_12june2006.pdf?1554324291

³² *The City’s Image Comes Hard*, Larry Burgess, Ph.D. October 31, 2002. <http://www.redlandsfortnightly.org/papers/burgess02.htm>.

³³ Report on Redlands Community Vision, 2006. Dyett and Bhatia. https://www.cityofredlands.org/sites/main/files/file-attachments/report-on-community-vision_12june2006.pdf?1554324291

³⁴ City of Redlands Citywide Historic Context Statement. Adopted September 19, 2017. https://www.cityofredlands.org/sites/main/files/file-attachments/reso_7782_with_hcs.pdf?1554319748

In recent years, the City has sought to construct infrastructure improvements incrementally throughout the entire jurisdiction. The City has allocated CDBG funds to repair and pave alleys, repair and rehabilitate public park facilities, and fund service providers who focus their efforts on the northern side of the City. Many Redlands streets were repaved under the City's PARIS (Pavement Accelerated Repair Implementation Strategy) program, including North Redlands, over several years as funding became available. The City has installed LED streetlights, established a Community Center, and has bolstered efforts to install new landscape and artwork improvements in some major corridor medians.

7.3.8 Summary and Explanation of Sites Inventory on Fair Housing:

A substantial portion of the sites planned for the lower- and moderate-income RHNA are located within census tracts with identified fair housing issues, leading to a potential concentration of poverty and additional fair housing issues. While the opportunity indicators show that the selected sites have a potential to create over-concentrations of lower-income residents, the inventory was specifically developed to locate high-density residential uses in areas of high opportunity, regardless of the TCAC or CalEnviroScreen score. This is part of a larger smart growth strategy to concentrate future growth around the three new Metrolink and Arrow passenger light rail stations in compact, mixed-use, walkable communities. This makes the most efficient and cost-effective use of existing essential infrastructure. Infill and redevelopment will enhance the public realm and increase amenities, services and employment opportunities that will benefit the immediate and adjacent neighborhoods as well as the entire City. The TVSP will also increase the number and type of housing options for a broad range of housing types, sizes, and incomes, leading to a more diverse, dynamic, and cohesive community. Residents in the future transit villages will have convenient access to many nearby household services and transportation options and will not necessarily be required to own a motor vehicle to access household needs or places of employment. Despite being identified in current maps as areas with lower opportunity, the new Metrolink Stations and TVSP will transform central Redlands into an area of high opportunity, with excellent access to employment, transportation, public amenities, healthcare, and retail destinations.

Most notably, the City identified many sites within immediate proximity to the new Metrolink stations. These sites are within the TVSP, which will update zoning to allow for high-density residential and mixed uses. Combined, the direct infrastructure investment of the Metrolink stations and more permissive zoning would catalyze redevelopment of underutilized commercial land and improvement in historically low resource areas. Additionally, these areas have pending/approved market-rate pipeline projects, adding diversity to the housing stock and income levels in central Redlands, as well as helping to stabilize neighborhood rents through additional housing options. Adoption of the TVSP is included in Program 1.1-3 and Program 1.5-8 serves to provide investment in historically underserved areas within the TVSP.

Properties outside of the TVSP were also selected based on access to employment, grocery stores, parks, and schools. Properties within the East Valley Corridor Specific Plan, which is accommodating a large number of lower and moderate-income units, have excellent access to employment centers at Esri and the neighboring Loma Linda University.

Additionally, the City is including programs to ensure that the sites inventory affirmatively furthers fair housing and provides increased access to opportunity, investment in historically underserved areas, and

contributes to increased housing opportunity and a broader equitable quality of life throughout the community. Programs include **facilitating the Tenant Protection Act (Program 1.3-9)**, a continued contract with a fair housing provider and expanded fair housing outreach in communities with disproportionate needs (Program 1.5-2, Program 1.5-4), incentivizing units in areas trending towards RCAAs including southern Redlands through ADUs and SB9 (Program 1.6-1), and removal of a CUP for developments with more than 35 units (Program 1.2-13).

7.4 IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

Table 7-13 displays the contributing factors from the AFFH analysis, their fair housing issues, [priority level](#) and meaningful actions included in the Implementation Plan to address them. [The City has adopted goals and actions to address the contributing factors identified through the AFFH analysis. Many of the RHNA sites are located in the TVSP area, which includes part of the area of high segregation and poverty. The TVSP is expected to improve resources in this area and provide significant investment into an area with a greater diversity, more environmental risk, and greater poverty. The City is also including outreach programs to address a potential community opposition to housing and improve outreach in communities with disproportionate housing needs. Other programs directed to fair housing include the continuation of the mobile home rent control ordinance, preapplication fee waivers for affordable housing developments and adoption of an inclusionary housing ordinance.](#)

[While the City views all contributing factors as an important priority to address, in determining the level on the table higher priority was given to factors that limit fair housing choice and or negatively impact fair housing, per Government Code section 65583\(c\)\(10\)\(A\)\(iv\).](#)

TABLE 7-13: IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

| Fair Housing Issue | Contributing Factor | Meaningful Actions | Priority |
|--------------------|--|--|---------------------|
| Outreach Capacity | <p>Lack of monitoring</p> <p>Lack of awareness of fair housing services</p> <p>Lack of a variety of media inputs</p> <p>Lack of marketing community meetings</p> | <p>Continue to contract with a fair housing service provider to provide fair housing services to residents of Redlands over the 2021-2029 planning period. As part of its scope of work, require increase outreach and education including a required fair housing workshops to be conducted in the downtown/central part of the City identified with disproportionate housing needs and displacement risks. (See Programs 1.5-2 Coordinate with IFHMB, 1.5-3 Promotion of Fair Housing Information, and 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs)</p> <p>Include fair housing testing³⁵ from fair housing provider as part of scope every two years starting in 2022.</p> <p>Expand outreach and education of the State's new Source of Income Protection (SB 329 and</p> | Low |

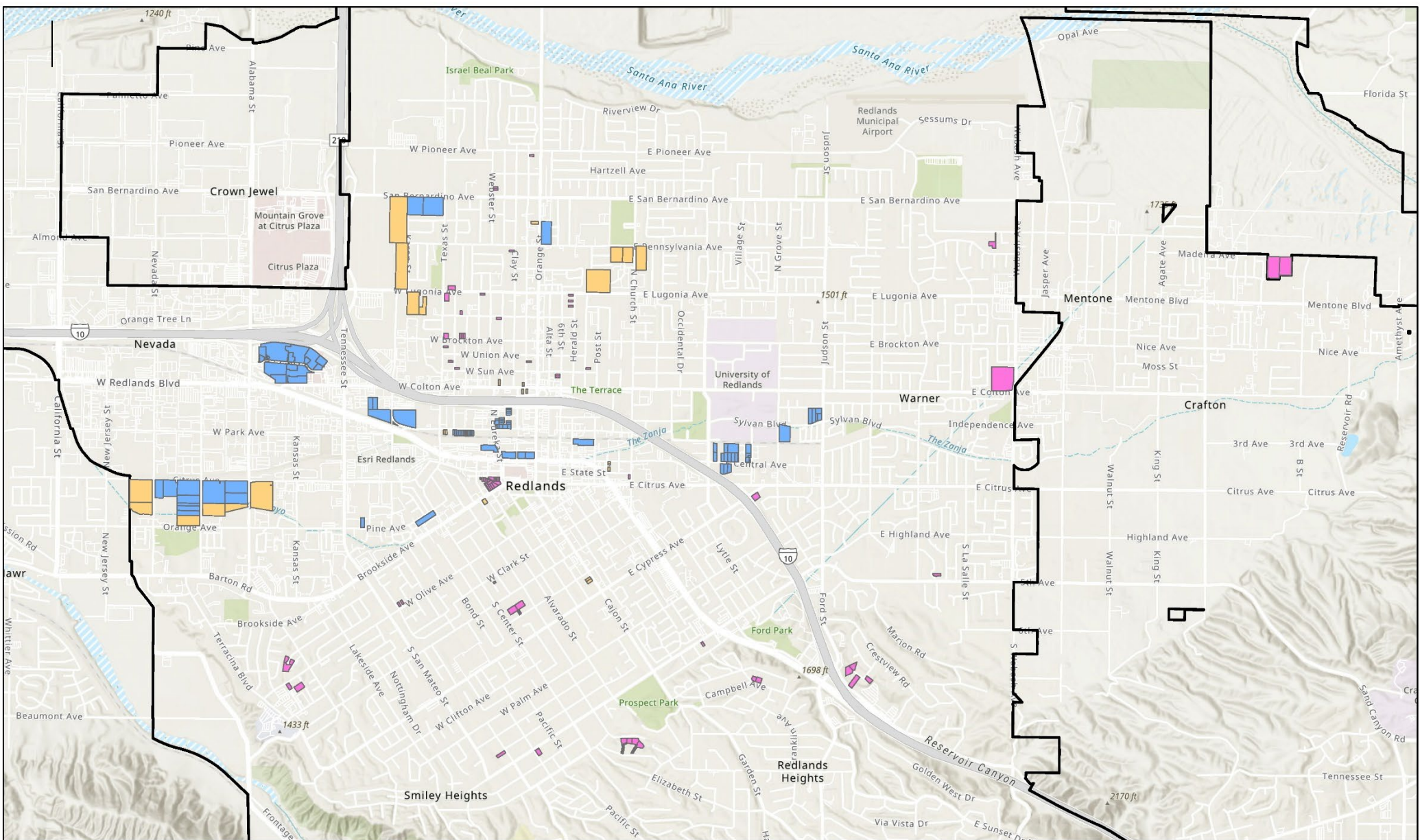
³⁵ Testing refers to the use of individuals who—without any bona fide intent to rent or purchase housing, purchase a mortgage or vehicle loan, or patronize a place of public accommodation—pose as prospective renters, borrowers, or patrons for the purpose of gathering information.

| Fair Housing Issue | Contributing Factor | Meaningful Actions | Priority |
|----------------------|---|--|------------------------|
| | | <p>SB 222), (See program 1.3-6 Outreach and Education)</p> <p>Include HCVs as legitimate source of income for housing. (See program 1.5-11). Increased outreach and education to the downtown/central census tracts with disproportionate needs.</p> <p>Require evidence of effective outreach from Fair Housing Provider on an annual basis. City will require attendance reports to events from fair housing providers.</p> <p>Based on reports, work with fair housing provider on plan to increase attendance to outreach events. (See Programs 1.5-2 Coordinate with IFHMB, 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs, and 1.5-5 Fair Housing reporting)</p> | |
| Segregation Patterns | <p>Concentration of minority populations in downtown area of City</p> <p>Geographic (North/South and regional) segregation by race/ethnicity and income</p> <p>Concentration of availability of appropriate housing types for housing choice vouchers like affordable rental units maintained by private owners</p> <p>Historic land use and zoning practices</p> | <p>Annually, prioritize any disadvantaged or environmental justice community areas such as the downtown/central census tracts, for actions and improvements. (See Programs 1.5-1 Place-Based Improvements)</p> <p>Promote key lower income housing opportunity sites for affordable housing development particularly in the TVSP, as a means to bring new housing opportunities in high resource areas. (See Program 1.1-3 TVSP)</p> <p>Provide written letters supporting funding applications by nonprofit developers for affordable housing in high resource areas. (See Programs 1.2-14 Waive Preapplication Fees for Affordable Housing Projects, 1.5-8 Residential Development in High Opportunity Area, and 1.5-10 NOFA/Non-Profit Housing Development)</p> <p>Study and implement an inclusionary housing ordinance to encourage low-income housing development (See Program 1.3-2).</p> | Medium |

| Fair Housing Issue | Contributing Factor | Meaningful Actions | Priority |
|--|--|--|------------------------|
| | | Removal of CUP requirement for developments with more than 35 units (See Program 1.2-13). | |
| Access to Opportunity: Area of High Segregation and Poverty | Lower environmental quality in census tracts Community opposition to new development | Adopt and implement the TVSP. Promote the plan to property owners and affordable and market rate housing developers. (See Program 1.5-8 Residential Development in High Opportunity Area and 1.1-3 TVSP) Address community opposition through outreach programs (See Program 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs and ADU Outreach in Program 1.6-1) | High |
| Disproportionate housing needs | Lack of availability of affordable units for low-income households Historic land use and zoning practices | Adopt and implement the TVSP. Promote the plan to property owners and affordable and market rate housing developers. Use the EIR for the TVSP to expedite housing projects that are consistent with the specific plan. (See Program 1.5-8 Residential Development in High Opportunity Area and 1.1-3 TVSP) The City will fund three beds as stated in Program 1.3-8: Homeless Assistance Program | High |
| Displacement | Increasing rents Displacement risk due to economic pressures | As part of the project application review, require applicant to provide advance noticing to existing tenants. Create a registry for “first-right of refusal” for displaced lower income tenants to return if affordable housing is created in the new project. (See Programs 1.4-1 Preservation of at Risk Housing and 1.4-2 Rehabilitate and Improve Condition of Existing Affordable Housing Stock) Focus fair housing outreach and education on areas with high displacement risk (downtown/central census tracts identified as a sensitive community and tracts identified as disadvantaged communities). (See Program 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs) Continue implement the Mobile Home Rent Control Ordinance (See Program 1.5-9) | Medium |

| Fair Housing Issue | Contributing Factor | Meaningful Actions | Priority |
|--------------------|---------------------|---|----------|
| | | Implement a ban on no-fault evictions (See Program 1.1-1) | |

Appendix A: Site Inventory Map



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Michael Baker
INTERNATIONAL

Appendix B: Site Inventory List

| APN | Site Address/Intersection | Existing Use/Vacancy | Identified in Last/Last Two Planning Cycle(s) | Zoning Designation (Current) | Current General Plan | Minimum Density Allowed (units/acre) | Parcel Size (Acres) | Max Units Existing Zoning | Existing Units | Realistic Capacity (Existing Zoning) | Projected General Plan | Projected Zoning | Max Density Allowed (units/acre) | Realistic Capacity (rezone) | New Income Category |
|-----------|---------------------------|----------------------|---|------------------------------|------------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|----------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 16712105 | 1624 Webster St | Vacant | N/A | R-1 | OFFICE | 0 | 0.146 | 0.87 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16714105 | 908 Elise Dr | Vacant | N/A | CP-4 | OFFICE | 0 | 4.997 | 0 | 0 | 0 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 120 | Lower |
| 16714106 | 1555 Texas St | Vacant | N/A | CP-4 | OFFICE | 0 | 6.306 | 0 | 0 | 0 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 151 | Lower |
| 16715123 | 1505 Orange St | Vacant | N/A | R-2 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.328 | 8.85 | 0 | 7 | | | 27 | 7 | Moderate |
| 16716110 | 1502 Orange St | Vacant | 5th | R-2 | MEDIUM DENSITY RESIDENTIAL | 0 | 3.958 | 106.87 | 0 | 85 | | | 27 | 85 | Lower |
| 16717104 | 1402 Karon St | Vacant | N/A | EV/SD | MEDIUM DENSITY RESIDENTIAL | 0 | 9.698 | 0 | 0 | 0 | MEDIUM DENSITY RESIDENTIAL | R-2 | 15 | 116 | Moderate |
| 16718102 | 1312 Texas St | Vacant | N/A | R-1 | COMMERCIAL | 0 | 0.523 | 3.14 | 0 | 3 | | | 6 | 3 | Above Moderate |
| 16723105 | 709 W Lugonia Ave | Vacant | 5th | R-1 | COMMERCIAL | 0 | 0.620 | 3.72 | 0 | 3 | | | 6 | 3 | Above Moderate |
| 16723226 | 606 W Western Ave | Vacant | N/A | R-1 | COMMERCIAL | 0 | 0.134 | 0.80 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16723312 | 1244 Columbia St | Vacant | N/A | R-1 | COMMERCIAL | 0 | 0.154 | 0.93 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16725313 | 1257 Herald St | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.132 | 0.79 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16725316 | 1239 Herald St | Vacant | N/A | R-2 | LOW DENSITY RESIDENTIAL | 0 | 0.152 | 0.91 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16725319 | 1227 Herald St | Vacant | N/A | R-2 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.152 | 0.91 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16728101 | 740 W Brockton Ave | Vacant | N/A | R-1 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.431 | 2.58 | 0 | 2 | | | 6 | 2 | Above Moderate |
| 16728219 | 1111 Calhoun St | Vacant | N/A | R-1 | LOW DENSITY RESIDENTIAL | 0 | 0.205 | 1.23 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16728220 | 1111 Calhoun St | Vacant | N/A | R-1 | LOW DENSITY RESIDENTIAL | 0 | 0.171 | 1.03 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16728221 | 620 W Brockton Ave | Vacant | N/A | R-1 | LOW DENSITY RESIDENTIAL | 0 | 0.172 | 1.03 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16729110 | 1143 Ohio St | Vacant | N/A | R-1 | LOW DENSITY RESIDENTIAL | 0 | 0.166 | 1 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16813104 | 1537 Carmel Ct | Vacant | N/A | R-E | LOW DENSITY RESIDENTIAL | 0 | 0.692 | 1.87 | 0 | 1 | | | 2.7 | 1 | Above Moderate |
| 16829102 | 1721 E Colton Ave | Vacant | 5th | R-1 | LOW DENSITY RESIDENTIAL | 0 | 9.007 | 54.04 | 0 | 43 | | | 6 | 43 | Above Moderate |
| 121226129 | 1421 Hunter Dr | Vacant | 5th | R-2 | LOW DENSITY RESIDENTIAL | 0 | 4.335 | 65.02 | 0 | 52 | | | 15 | 52 | Moderate |
| 16714104 | 912 Elise Dr | Vacant | N/A | CP-4 | LOW DENSITY RESIDENTIAL | 0 | 14.048 | 0 | 0 | 0 | MEDIUM DENSITY RESIDENTIAL | R-2 | 15 | 169 | Moderate |
| 16903104 | 1018 Texas St | Vacant | N/A | R-1 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.138 | 0.83 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16903212 | 929 Lawton St | Vacant | N/A | R-1 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.142 | 0.85 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16903501 | 910 Lawton St | Vacant | N/A | R-1 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.139 | 0.84 | 0 | 1 | | | 6 | 1 | Above Moderate |

| APN | Site Address/Intersection | Existing Use/Vacancy | Identified in Last/Last Two Planning Cycle(s) | Zoning Designation (Current) | Current General Plan | Minimum Density Allowed (units/acre) | Parcel Size (Acres) | Max Units Existing Zoning | Existing Units | Realistic Capacity (Existing Zoning) | Projected General Plan | Projected Zoning | Max Density Allowed (units/acre) | Realistic Capacity (rezone) | New Income Category |
|----------|---------------------------|----------------------|---|------------------------------|------------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 16905311 | 302 W Colton Ave | Vacant | N/A | C-4 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.198 | 5.94 | 0 | 3 | TVSP | TVSP | 30 | 3 | Moderate |
| 16906310 | 102 W Colton Ave | Vacant | N/A | C-4 | LOW DENSITY RESIDENTIAL | 0 | 0.135 | 4.04 | 0 | 2 | TVSP | TVSP | 30 | 2 | Moderate |
| 16906506 | 924 Washington St | Vacant | N/A | T | VERY LOW DENSITY RESIDENTIAL | 0 | 0.137 | 0.82 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16907606 | 831 N 6th St | Vacant | N/A | R-2 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.141 | 0.85 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16907607 | 831 N 6th St | Vacant | N/A | R-2 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.149 | 0.90 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16910613 | 910 Tribune St | Vacant | N/A | R-2 | VERY LOW DENSITY RESIDENTIAL | 0 | 0.124 | 0.74 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16911123 | 663 New York St | Vacant | N/A | C-M | LOW DENSITY RESIDENTIAL | 0 | 0.998 | 0 | 0 | 0 | TVSP | TVSP | 30 | 15 | Lower |
| 16911124 | 1120 W Redlands Blvd | Vacant | N/A | C-M | LOW DENSITY RESIDENTIAL | 0 | 0.999 | 0 | 0 | 0 | TVSP | TVSP | 30 | 15 | Lower |
| 16915301 | 604 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.168 | 5.03 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16915302 | 608 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.160 | 4.81 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915303 | 612 Ruiz St | Parking Lot | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.160 | 4.81 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915314 | 612 Ruiz St | Parking Lot | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.123 | 3.68 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915611 | 516 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.170 | 5.10 | 1 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915612 | 512 Ruiz St | Vacant | N/A | SP45/TC | OFFICE | 0 | 0.162 | 4.86 | 1 | 1 | TVSP | TVSP | 30 | 1 | Lower |
| 16915613 | 512 Ruiz St | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.271 | 8.14 | 0 | 4 | TVSP | TVSP | 30 | 4 | Lower |
| 16915614 | 250 W Stuart St | Vacant | 4th and 5th | SP45/TC | MEDIUM DENSITY RESIDENTIAL | 0 | 0.351 | 10.54 | 0 | 5 | TVSP | TVSP | 30 | 5 | Lower |
| 16915615 | 511 Ruiz St | Vacant | 4th and 5th | SP45/TC | COMMERCIAL | 0 | 0.272 | 8.15 | 0 | 4 | TVSP | TVSP | 30 | 4 | Lower |
| 16915616 | 320 Stuart Ave | Vacant | 4th and 5th | SP45/TC | COMMERCIAL | 0 | 0.127 | 3.82 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915617 | 320 Stuart Ave | Vacant | 4th and 5th | SP45/TC | COMMERCIAL | 0 | 0.124 | 3.73 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915618 | 320 Stuart Ave | Vacant | 4th and 5th | SP45/TC | MEDIUM DENSITY RESIDENTIAL | 0 | 0.022 | 0.66 | 0 | 0 | TVSP | TVSP | 30 | 1 | Lower |
| 16915619 | 508 N Eureka St | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.290 | 8.70 | 0 | 4 | TVSP | TVSP | 30 | 4 | Lower |
| 16915620 | 516 N Eureka St | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.124 | 3.71 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915629 | 523 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.156 | 4.69 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16915630 | 519 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.156 | 4.69 | 1 | 1 | TVSP | TVSP | 30 | 1 | Lower |
| 16915631 | 515 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.156 | 4.69 | 1 | 1 | TVSP | TVSP | 30 | 1 | Lower |

| APN | Site Address/Intersection | Existing Use/Vacancy | Identified in Last/Last Two Planning Cycle(s) | Zoning Designation (Current) | Current General Plan | Minimum Density Allowed (units/acre) | Parcel Size (Acres) | Max Units Existing Zoning | Existing Units | Realistic Capacity (Existing Zoning) | Projected General Plan | Projected Zoning | Max Density Allowed (units/acre) | Realistic Capacity (rezone) | New Income Category |
|----------|---------------------------|---------------------------|---|------------------------------|------------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|--------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 16915632 | 511 Ruiz St | Vacant | N/A | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.164 | 4.92 | 1 | 1 | TVSP | TVSP | 30 | 1 | Lower |
| 16920203 | 107 W Colton Ave | Vacant | N/A | C-4 | LOW DENSITY RESIDENTIAL | 0 | 0.148 | 4.43 | 0 | 2 | TVSP | TVSP | 30 | 2 | Moderate |
| 16920205 | 35 W Colton Ave | Vacant | N/A | C-4 | LOW DENSITY RESIDENTIAL | 0 | 0.123 | 3.68 | 0 | 2 | TVSP | TVSP | 30 | 2 | Moderate |
| 16925101 | 619 New York St | Single Family Residential | N/A | C-M | VERY LOW DENSITY RESIDENTIAL | 0 | 3.817 | 0 | 1 | -1 | TVSP | TVSP | 30 | 56 | Lower |
| 16927102 | 430 Texas St | Vacant | N/A | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.148 | 4.44 | 0 | 2 | TVSP | TVSP | 30 | 2 | Moderate |
| 16927103 | 715 W Stuart Ave | Vacant | N/A | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.152 | 4.55 | 0 | 2 | TVSP | TVSP | 30 | 2 | Moderate |
| 16927107 | 701 Stuart Ave | Vacant | N/A | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.160 | 4.80 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16927109 | 619 Stuart Ave | Vacant | 4th and 5th | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.176 | 5.27 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16927110 | 615 Stuart Ave | Vacant | 4th and 5th | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.176 | 5.27 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16927111 | 611 W Stuart | Vacant | 4th and 5th | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.176 | 5.27 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16927112 | 611 W Stuart | Vacant | 4th and 5th | SP45/SC | LOW DENSITY RESIDENTIAL | 0 | 0.176 | 5.27 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16927113 | 607 Stuart Ave | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.165 | 4.94 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16927115 | 545 Stuart Ave | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.110 | 3.30 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16927116 | 545 Stuart Ave | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.110 | 3.30 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16927117 | 545 Stuart Ave | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.183 | 5.49 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16927118 | 535 W Stuart Ave | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.108 | 3.25 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16927119 | 535 W Stuart Ave | Vacant | 4th and 5th | SP45/TC | LOW DENSITY RESIDENTIAL | 0 | 0.090 | 2.71 | 0 | 1 | TVSP | TVSP | 30 | 1 | Lower |
| 16927120 | 535 W Stuart Ave | Commercial and Services | 4th and 5th | SP45/TC | COMMERCIAL/INDUS TRIAL | 0 | 0.158 | 4.73 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 16927153 | 701 Stuart Ave | Vacant | 4th and 5th | SP45/SC | COMMERCIAL | 0 | 0.175 | 5.26 | 0 | 3 | TVSP | TVSP | 30 | 3 | Lower |
| 16927229 | 420 W Redlands Blvd | Parking Lot | N/A | M-1 | COMMERCIAL/INDUS TRIAL | 0 | 1.569 | 0 | 0 | 0 | TVSP | TVSP | 30 | 24 | Lower |
| 16928130 | 120 W Redlands Blvd | Commercial and Services | N/A | SP45/TCH | COMMERCIAL/INDUS TRIAL | 0 | 1.479 | 44.36 | 0 | 22 | TVSP | TVSP | 30 | 22 | Lower |
| 16928154 | 110 W Redlands Blvd | Commercial and Services | N/A | SP45/TCH | COMMERCIAL/INDUS TRIAL | 0 | 0.868 | 26.03 | 0 | 13 | TVSP | TVSP | 30 | 13 | Lower |
| 16928155 | 4 W Redlands Blvd | Commercial and Services | N/A | SP45/TCH | COMMERCIAL/INDUS TRIAL | 0 | 1.006 | 30.18 | 0 | 15 | TVSP | TVSP | 30 | 15 | Lower |
| 16931317 | 301 9th St | Vacant | N/A | SP45/SC | COMMERCIAL/INDUS TRIAL | 0 | 2.157 | 64.70 | 0 | 32 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 52 | Lower |

| APN | Site Address/Intersection | Existing Use/Vacancy | Identified in Last/Last Two Planning Cycle(s) | Zoning Designation (Current) | Current General Plan | Minimum Density Allowed (units/acre) | Parcel Size (Acres) | Max Units Existing Zoning | Existing Units | Realistic Capacity (Existing Zoning) | Projected General Plan | Projected Zoning | Max Density Allowed (units/acre) | Realistic Capacity (rezone) | New Income Category |
|----------|---------------------------|---------------------------|---|------------------------------|--------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 16937106 | 1580 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL/INDUS TRIAL | 0 | 1.163 | 0 | 0 | 0 | TVSP | TVSP | 30 | 17 | Lower |
| 16937110 | 1580 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 0.051 | 0 | 0 | 0 | TVSP | TVSP | 30 | 1 | Lower |
| 16937112 | 1580 Industrial Park Ave | Parking Lot | N/A | EV/CG | COMMERCIAL | 0 | 0.149 | 0 | 0 | 0 | TVSP | TVSP | 30 | 2 | Lower |
| 16937117 | 1580 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 0.057 | 0 | 0 | 0 | TVSP | TVSP | 30 | 1 | Lower |
| 16937118 | 1520 Industrial Park Ave | Parking Lot | N/A | EV/CG | COMMERCIAL | 0 | 0.096 | 0 | 0 | 0 | TVSP | TVSP | 30 | 1 | Lower |
| 16937121 | 1580 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 0.077 | 0 | 0 | 0 | TVSP | TVSP | 30 | 1 | Lower |
| 16937122 | 1580 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 0.415 | 0 | 0 | 0 | TVSP | TVSP | 30 | 6 | Lower |
| 16938105 | 1520 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 6.964 | 0 | 0 | 0 | TVSP | TVSP | 30 | 104 | Lower |
| 16938108 | 830 Tri City Center Dr | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 1.066 | 0 | 0 | 0 | TVSP | TVSP | 30 | 16 | Lower |
| 16938110 | 800 Tri City Center Dr | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 2.350 | 0 | 0 | 0 | TVSP | TVSP | 30 | 35 | Lower |
| 16938111 | 1460 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 0.908 | 0 | 0 | 0 | TVSP | TVSP | 30 | 14 | Lower |
| 16938113 | 1515 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 4.572 | 0 | 0 | 0 | TVSP | TVSP | 30 | 69 | Lower |
| 16938114 | 801 Tri City Center Dr | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 1.895 | 0 | 0 | 0 | TVSP | TVSP | 30 | 28 | Lower |
| 16940113 | 1350 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 0.695 | 0 | 0 | 0 | TVSP | TVSP | 30 | 10 | Lower |
| 17012111 | 1327 Sylvan Blvd | Single Family Residential | N/A | R-2 | COMMERCIAL | 0 | 0.996 | 26.90 | 1 | 21 | TVSP | TVSP | 30 | 14 | Lower |
| 17012112 | 1329 Sylvan Blvd | Single Family Residential | N/A | R-2 | COMMERCIAL | 0 | 0.900 | 24.29 | 1 | 18 | TVSP | TVSP | 30 | 12 | Lower |
| 17012113 | 633 N Judson St | Single Family Residential | N/A | R-2 | COMMERCIAL | 0 | 0.573 | 15.47 | 1 | 11 | TVSP | TVSP | 30 | 8 | Lower |
| 17012114 | 1331 Sylvan Blvd | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.490 | 13.24 | 0 | 11 | TVSP | TVSP | 30 | 7 | Lower |
| 17012115 | 1331 Sylvan Blvd | Single Family Residential | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.249 | 6.71 | 1 | 4 | TVSP | TVSP | 30 | 3 | Lower |
| 17017101 | 1316 Sylvan Blvd | Vacant | 5th | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 3.127 | 84.43 | | 6 0 8 | TVSP | TVSP | 30 | 47 | Lower |
| 17020101 | 1129 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.287 | 7.76 | 0 | 6 | TVSP | TVSP | 30 | 4 | Lower |
| 17020102 | 1143 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.086 | 2.32 | 0 | 2 | TVSP | TVSP | 30 | 1 | Lower |
| 17020107 | 1123 E Central Ave | Multi-Family Residential | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.574 | 15.49 | 2 | 10 | TVSP | TVSP | 30 | 7 | Lower |
| 17020108 | 1119 E Central Ave | Single Family Residential | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.574 | 15.49 | 2 | 10 | TVSP | TVSP | 30 | 7 | Lower |

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|----------|---------------------------|---------------------------|---|------------------------------|----------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 17020109 | 1115 E Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.574 | 15.49 | 0 | 12 | TVSP | TVSP | 30 | 9 | Lower |
| 17020112 | 1111 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.574 | 15.49 | 0 | 12 | TVSP | TVSP | 30 | 9 | Lower |
| 17020121 | 1111 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.574 | 15.49 | 0 | 12 | TVSP | TVSP | 30 | 9 | Lower |
| 17020124 | 1111 Central Ave | Vacant | 5th | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.574 | 15.50 | 0 | 12 | TVSP | TVSP | 30 | 9 | Lower |
| 17020130 | 337 N Cook St | Single Family Residential | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.799 | 21.58 | 1 | 16 | TVSP | TVSP | 30 | 11 | Lower |
| 17020133 | 1113 E Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.413 | 11.16 | 0 | 9 | TVSP | TVSP | 30 | 6 | Lower |
| 17020134 | 1143 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.287 | 7.75 | 0 | 6 | TVSP | TVSP | 30 | 4 | Lower |
| 17020135 | 1143 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.137 | 3.71 | 0 | 3 | TVSP | TVSP | 30 | 2 | Lower |
| 17020137 | 1125 Central Ave | Vacant | N/A | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.430 | 11.62 | 1 | 8 | TVSP | TVSP | 30 | 5 | Lower |
| 17020138 | 1129 Central Ave | Vacant | 5th | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 1.867 | 50.40 | 0 | 40 | TVSP | TVSP | 30 | 28 | Lower |
| 17025105 | 1110 Central Ave | Vacant | 5th | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.641 | 17.31 | 0 | 14 | TVSP | TVSP | 30 | 10 | Lower |
| 17025106 | 1122 Central Ave | Vacant | 5th | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.628 | 16.95 | 0 | 14 | TVSP | TVSP | 30 | 9 | Lower |
| 17025107 | 1122 Central Ave | Vacant | 5th | R-2 | HIGH DENSITY RESIDENTIAL | 0 | 0.556 | 15.00 | 0 | 12 | TVSP | TVSP | 30 | 8 | Lower |
| 17108501 | 604 State St | Vacant | 5th | A-P | HIGH DENSITY RESIDENTIAL | 0 | 0.173 | 2.60 | 0 | 2 | TVSP | TVSP | 30 | 3 | Moderate |
| 17108503 | 604 Central Ave | Vacant | N/A | A-P | HIGH DENSITY RESIDENTIAL | 0 | 0.055 | 0.83 | 0 | 1 | TVSP | TVSP | 30 | 1 | Moderate |
| 17108504 | 604 Central Ave | Vacant | N/A | A-P | HIGH DENSITY RESIDENTIAL | 0 | 0.082 | 1.24 | 0 | 1 | TVSP | TVSP | 30 | 1 | Moderate |
| 17108913 | 21 Church St | Vacant | N/A | T | HIGH DENSITY RESIDENTIAL | 0 | 0.125 | 1.87 | 0 | 1 | TVSP | TVSP | 30 | 1 | Above Moderate |
| 17118137 | 100 Tennessee St | Vacant | N/A | R-2 | COMMERCIAL/INDUS TRIAL | 0 | 0.663 | 17.91 | 0 | 14 | TVSP | TVSP | 30 | 10 | Lower |
| 17119129 | 15 Center St | Schools | 5th | R-2 | COMMERCIAL/INDUS TRIAL | 0 | 1.888 | 50.96 | 0 | 41 | TVSP | TVSP | 30 | 28 | Lower |
| 17121109 | 419 Citrus Ave | Vacant | N/A | C-3 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.035 | 1.06 | 0 | 1 | TVSP | TVSP | 30 | 1 | Above Moderate |
| 17121111 | 411 Citrus Ave | Vacant | N/A | C-3 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.098 | 2.94 | 0 | 1 | TVSP | TVSP | 30 | 1 | Above Moderate |
| 17121112 | 407 W Citrus St | Vacant | N/A | C-3 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.104 | 3.12 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17121113 | 216 Brookside Ave | Vacant | N/A | C-3 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.156 | 4.69 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |

| APN | Site Address/Intersection | Existing Use/Vacancy | Identified in Last/Last Two Planning Cycle(s) | Zoning Designation (Current) | Current General Plan | Minimum Density Allowed (units/acre) | Parcel Size (Acres) | Max Units Existing Zoning | Existing Units | Realistic Capacity (Existing Zoning) | Projected General Plan | Projected Zoning | Max Density Allowed (units/acre) | Realistic Capacity (rezone) | New Income Category |
|----------|---------------------------|---------------------------|---|------------------------------|----------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|----------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 17121114 | 216 Brookside Ave | Vacant | N/A | C-3 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.026 | 0.77 | 0 | 0 | TVSP | TVSP | 30 | 1 | Above Moderate |
| 17121121 | 216 Brookside Ave | Vacant | N/A | C-3 | MEDIUM DENSITY RESIDENTIAL | 0 | 0.152 | 4.56 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17124124 | 317 Brookside Ave | Vacant | 5th | A-P | COMMERCIAL/INDUS TRIAL | 0 | 0.344 | 10.32 | 0 | 5 | | | 30 | 5 | Moderate |
| 17135128 | 311 Normande Ct | Vacant | N/A | R-2 | COMMERCIAL/INDUS TRIAL | 0 | 0.074 | 1.11 | 0 | 1 | | | 15 | 1 | Above Moderate |
| 17205201 | 1617 W Olive Ave | Vacant | N/A | R-S | 0 | 0 | 0.380 | 2.28 | 0 | 2 | | | 6 | 2 | Above Moderate |
| 17208218 | 1114 W Olive Ave | Vacant | N/A | R-S | MEDIUM DENSITY RESIDENTIAL | 0 | 0.143 | 0.86 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 17208220 | 1114 W Olive Ave | Vacant | N/A | R-S | COMMERCIAL | 0 | 0.157 | 0.94 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 17243147 | 141 Calle Constancia | Vacant | N/A | R-S | COMMERCIAL | 0 | 0.903 | 5.42 | 0 | 4 | | | 6 | 4 | Above Moderate |
| 17243148 | 1509 Blossom Ct | Vacant | 5th | R-S | COMMERCIAL | 0 | 0.313 | 1.88 | 0 | 2 | | | 6 | 2 | Above Moderate |
| 17301139 | 550 North Pl | Vacant | 5th | R-S | COMMERCIAL | 0 | 0.996 | 5.98 | 0 | 5 | | | 6 | 5 | Above Moderate |
| 17301140 | 608 North Pl | Vacant | 5th | R-S | COMMERCIAL | 0 | 1.016 | 6.09 | 0 | 5 | | | 6 | 5 | Above Moderate |
| 17304315 | 516 S Cajon St | Vacant | N/A | A-P | COMMERCIAL | 0 | 0.215 | 6.45 | 0 | 3 | | | 30 | 3 | Moderate |
| 17304316 | 532 S Cajon St | Vacant | N/A | A-P | COMMERCIAL | 0 | 0.275 | 8.26 | 0 | 4 | | | 30 | 4 | Moderate |
| 17319116 | 1233 Morrison Dr | Vacant | N/A | R-S | COMMERCIAL | 0 | 0.699 | 4.20 | 0 | 3 | | | 6 | 3 | Above Moderate |
| 17402149 | 1335 Knoll Rd | Vacant | N/A | R-A | COMMERCIAL | 0 | 0.704 | 1.90 | 0 | 2 | | | 2.7 | 2 | Above Moderate |
| 17402150 | 1355 Knoll Rd | Vacant | N/A | R-A | COMMERCIAL | 0 | 0.740 | 2.00 | 0 | 2 | | | 2.7 | 2 | Above Moderate |
| 17402151 | 1355 Knoll Rd | Vacant | N/A | R-A | COMMERCIAL | 0 | 0.846 | 2.28 | 0 | 2 | | | 2.7 | 2 | Above Moderate |
| 17402160 | 1363 Knoll Rd | Vacant | N/A | R-A | COMMERCIAL | 0 | 0.734 | 1.98 | 0 | 2 | | | 2.7 | 2 | Above Moderate |
| 17404103 | 322 E Highland Ave | Vacant | N/A | R-S | COMMERCIAL | 0 | 0.172 | 1.03 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 17408210 | 340 Summit Ave | Vacant | N/A | R-E | COMMERCIAL | 0 | 0.474 | 1.28 | 0 | 1 | | | 2.7 | 1 | Above Moderate |
| 17460102 | 673 Bradbury Dr | Vacant | N/A | R-E | COMMERCIAL | 0 | 0.501 | 1.35 | 0 | 1 | | | 2.7 | 1 | Above Moderate |
| 17460105 | 693 Bradbury Dr | Vacant | N/A | R-E | COMMERCIAL | 0 | 1.060 | 2.86 | 0 | 2 | | | 2.7 | 2 | Above Moderate |
| 17460108 | 679 Chaucer Ct | Vacant | N/A | R-E | COMMERCIAL | 0 | 0.583 | 1.57 | 0 | 1 | | | 2.7 | 1 | Above Moderate |
| 17511114 | 945 W Highland Ave | Vacant | N/A | R-S | COMMERCIAL | 0 | 0.454 | 2.72 | 0 | 2 | | | 6 | 2 | Above Moderate |
| 29216505 | 27045 Citrus Ave | Agriculture | N/A | EV/IC | COMMERCIAL | 0 | 5.840 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 139 | Lower |
| 29216506 | 10972 Iowa St | Single Family Residential | N/A | EV/IC | COMMERCIAL | 0 | 3.146 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 75 | Lower |
| 29216507 | 11006 Iowa St | Single Family Residential | N/A | EV/IC | COMMERCIAL | 0 | 1.075 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 25 | Lower |
| 29216508 | 11018 Iowa St | Single Family Residential | N/A | EV/IC | COMMERCIAL | 0 | 1.897 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 45 | Lower |
| 29216509 | 11034 Iowa St | Single Family Residential | N/A | EV/IC | COMMERCIAL | 0 | 1.900 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 45 | Lower |
| 29216517 | 10941 Nevada St | Agriculture | N/A | EV/IC | COMMERCIAL | 0 | 4.027 | 0 | 0 | 0 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 97 | Lower |
| 29216702 | 11063 Iowa St | Vacant | N/A | EV/IC | COMMERCIAL | 0 | 4.869 | 0 | 0 | 0 | MEDIUM DENSITY RESIDENTIAL | R-2 | 30 | 58 | Moderate |
| 29216707 | 169 Alabama St | Single Family Residential | N/A | EV/IC | COMMERCIAL | 0 | 2.345 | 0 | 1 | -1 | MEDIUM DENSITY RESIDENTIAL | R-2 | 30 | 27 | Moderate |
| 29216728 | 10287 Alabama St | Single Family Residential | N/A | EV/IC | COMMERCIAL | 0 | 4.725 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 112 | Lower |

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|----------|---------------------------|-------------------------|---|------------------------------|-----------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|----------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 29216729 | 169 Alabama St | Agriculture | N/A | EV/IC | COMMERCIAL | 0 | 4.215 | 0 | 0 | 0 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 101 | Lower |
| 29216730 | 11006 Iowa St | Agriculture | N/A | EV/IC | COMMERCIAL | 0 | 8.857 | 0 | 0 | 0 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 213 | Lower |
| 29220120 | 27395 Citrus Ave | Vacant | N/A | EV/IC | COMMERCIAL | 0 | 10.648 | 0 | 0 | 0 | MEDIUM DENSITY RESIDENTIAL | R-2 | 30 | 128 | Moderate |
| 29821109 | 1380 Plumwood | Vacant | N/A | R-1 | COMMERCIAL | 0 | 4.468 | 26.81 | 0 | 21 | | | 6 | 21 | Above Moderate |
| 29821139 | 2196 Madeira Ave | Vacant | N/A | R-E | COMMERCIAL | 0 | 3.787 | 22.72 | 0 | 18 | | | 6 | 18 | Above Moderate |
| 16711410 | 1734 Washington St | Vacant | N/A | R-1 | COMMERCIAL | 0 | 0.147 | 0.88 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16712104 | 1612 Webster St | Vacant | N/A | R-1 | COMMERCIAL | 0 | 0.146 | 0.87 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16720133 | 1455 Clay St | Vacant | N/A | R-1 | COMMERCIAL | 0 | 0.156 | 0.94 | 0 | 1 | | | 6 | 1 | Above Moderate |
| 16927114 | 545 Stuart Ave | Vacant | 4th and 5th | SP45/TC | COMMERCIAL | 0 | 0.110 | 3.30 | 0 | 2 | TVSP | TVSP | 30 | 2 | Lower |
| 17110101 | 305 W State St | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.108 | 3.25 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17110102 | 305 W State St | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.108 | 3.25 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17110103 | 305 W State St | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.108 | 3.25 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17110104 | 309 W State St | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.108 | 3.25 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17110105 | 216 Brookside Ave | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.250 | 7.49 | 0 | 4 | TVSP | TVSP | 30 | 4 | Above Moderate |
| 17121115 | 216 Brookside Ave | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.116 | 3.49 | 0 | 2 | TVSP | TVSP | 30 | 2 | Above Moderate |
| 17121125 | 216 Brookside Ave | Vacant | N/A | C-3 | PUBLIC/INSTITUTIONAL | 0 | 0.462 | 13.87 | 0 | 7 | TVSP | TVSP | 30 | 7 | Above Moderate |
| 17243146 | 1520 Blossom Ct | Vacant | 5th | R-S | PUBLIC/INSTITUTIONAL | 0 | 0.364 | 2.18 | 0 | 2 | | | 6 | 2 | Above Moderate |
| 17447154 | 317 Silvertree Ln | Vacant | 5th | R-E | PUBLIC/INSTITUTIONAL | 0 | 0.348 | 2.09 | 0 | 2 | | | 6 | 2 | Above Moderate |
| 16902102 | 831 W Lugonia Ave | Vacant | 5th | A-1 | PUBLIC/INSTITUTIONAL | 0 | 4.757 | 71.36 | 0 | 57 | | | 15 | 57 | Moderate |
| 16902111 | 831 W Lugonia Ave | Vacant | 5th | R-1 | PUBLIC/INSTITUTIONAL | 0 | 1.641 | 24.62 | 0 | 20 | | | 15 | 20 | Moderate |
| 16722110 | 438 Hidalgo Ave | Vacant | 5th | R-2 | PUBLIC/INSTITUTIONAL | 0 | 9.480 | 142.19 | 0 | 114 | | | 15 | 114 | Moderate |
| 16722116 | 1400 Church Pl | Vacant | 5th | R-2 | PUBLIC/INSTITUTIONAL | 0 | 2.765 | 41.47 | 0 | 33 | | | 15 | 33 | Moderate |
| 16722115 | 539 Jurupa Ave | Vacant | 5th | R-2 | PUBLIC/INSTITUTIONAL | 0 | 3.174 | 47.62 | 0 | 38 | | | 15 | 38 | Moderate |
| 16938109 | 810 Tri-City Center Dr | Commercial and Services | N/A | EV/CG | PUBLIC/INSTITUTIONAL | 0 | 3.363 | 0 | 0 | 0 | TVSP | TVSP | 30 | 50 | Lower |
| 16940111 | 1372 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL/INDUSTRIAL | 0 | 0.502 | 0 | 0 | 0 | TVSP | TVSP | 30 | 8 | Lower |
| 29216510 | 11090 Iowa St | Vacant | 5th | EV3000RM | COMMERCIAL/INDUSTRIAL | 0 | 4.067 | 61.00 | 1 | 48 | | | 15 | 48 | Moderate |

| APN | Site Address/Intersection | Existing Use/Vacancy | Identified in Last/Last Two Planning Cycle(s) | Zoning Designation (Current) | Current General Plan | Minimum Density Allowed (units/acre) | Parcel Size (Acres) | Max Units Existing Zoning | Existing Units | Realistic Capacity (Existing Zoning) | Projected General Plan | Projected Zoning | Max Density Allowed (units/acre) | Realistic Capacity (rezone) | New Income Category |
|----------|---------------------------|-----------------------------------|---|------------------------------|--------------------------|--------------------------------------|---------------------|---------------------------|----------------|--------------------------------------|----------------------------|------------------|----------------------------------|-----------------------------|---------------------|
| 29216303 | 11030 Nevada St | Single Family Residential | N/A | EV/IC | COMMERCIAL/INDUS TRIAL | 0 | 4.261 | 0 | 1 | -1 | MEDIUM DENSITY RESIDENTIAL | R-2 | 15 | 50 | Moderate |
| 29216302 | 10940 Nevada St | Multi-Use Residential Agriculture | N/A | EV/IC | COMMERCIAL/INDUS TRIAL | 0 | 8.905 | 0 | 2 | -2 | MEDIUM DENSITY RESIDENTIAL | R-2 | 15 | 105 | Moderate |
| 29216516 | 10941 Nevada St | Single Family Residential | N/A | EV/IC | HIGH DENSITY RESIDENTIAL | 0 | 2.497 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 59 | Lower |
| 17460107 | 693 Bradbury Dr | Vacant | N/A | R-E | HIGH DENSITY RESIDENTIAL | 0 | 0.877 | 2.37 | 0 | 2 | | | 2.7 | 2 | Above Moderate |
| 16938112 | 1402 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 4.682 | 0 | 0 | 0 | TVSP | TVSP | 30 | 70 | Lower |
| 16940110 | 1380 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 3.182 | 0 | 0 | 0 | TVSP | TVSP | 30 | 48 | Lower |
| 16940112 | 1362 Industrial Park Ave | Commercial and Services | N/A | EV/CG | COMMERCIAL | 0 | 1.252 | 0 | 0 | 0 | TVSP | TVSP | 30 | 19 | Lower |
| 17121120 | 216 Brookside Ave | Vacant | N/A | C-3 | COMMERCIAL | 0 | 0.286 | 8.57 | 0 | 4 | TVSP | TVSP | 30 | 4 | Above Moderate |
| 17121116 | 216 Brookside Ave | Vacant | N/A | C-3 | COMMERCIAL | 0 | 0.218 | 6.55 | 0 | 3 | TVSP | TVSP | 30 | 3 | Above Moderate |
| 17121119 | 216 Brookside Ave | Vacant | N/A | C-3 | COMMERCIAL | 0 | 0.191 | 5.72 | 0 | 3 | TVSP | TVSP | 30 | 3 | Above Moderate |
| 17121118 | 216 Brookside Ave | Vacant | N/A | C-3 | COMMERCIAL | 0 | 0.229 | 6.86 | 0 | 3 | TVSP | TVSP | 30 | 3 | Above Moderate |
| 17121117 | 216 Brookside Ave | Vacant | N/A | C-3 | COMMERCIAL | 0 | 0.312 | 9.36 | 0 | 5 | TVSP | TVSP | 30 | 5 | Above Moderate |
| 16926124 | 620 New York St | Single Family Residential | N/A | C-M | COMMERCIAL | 0 | 5.948 | 0 | 1 | -1 | HIGH DENSITY RESIDENTIAL | R-3 | 30 | 142 | Lower |
| 17408219 | 1313 Elm St | Vacant | N/A | R-E | COMMERCIAL | 0 | 0.323 | 0.87 | 0 | 1 | | | 2.7 | 1 | Above Moderate |
| 17504247 | 1056 San Jacinto St | Vacant | N/A | R-S | COMMERCIAL/INDUS TRIAL | 0 | 0.445 | 2.67 | 0 | 2 | | | 6 | 2 | Above Moderate |
| APN | | | | | COMMERCIAL | | | | 0 | 0 | | | | | |

Michael Baker
INTERNATIONAL

Appendix C: **Community Engagement**

8 COMMUNITY OUTREACH

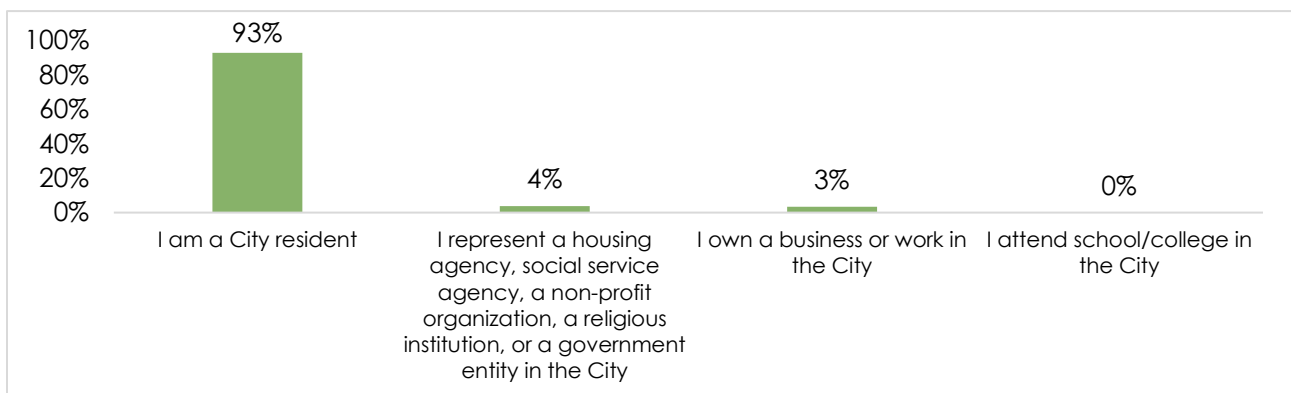
The California Government Code requires that local governments make diligent efforts to solicit public participation from all economic segments of the community, especially low-income persons, in the development of the Housing Element. During the preparation of this Housing Element update, public input was actively encouraged in a variety of ways. It should be noted that public meeting summaries, including questions and staff responses, have been summarized and edited for clarity.

8.1 EFFORTS TO ACHIEVE CITIZEN PARTICIPATION

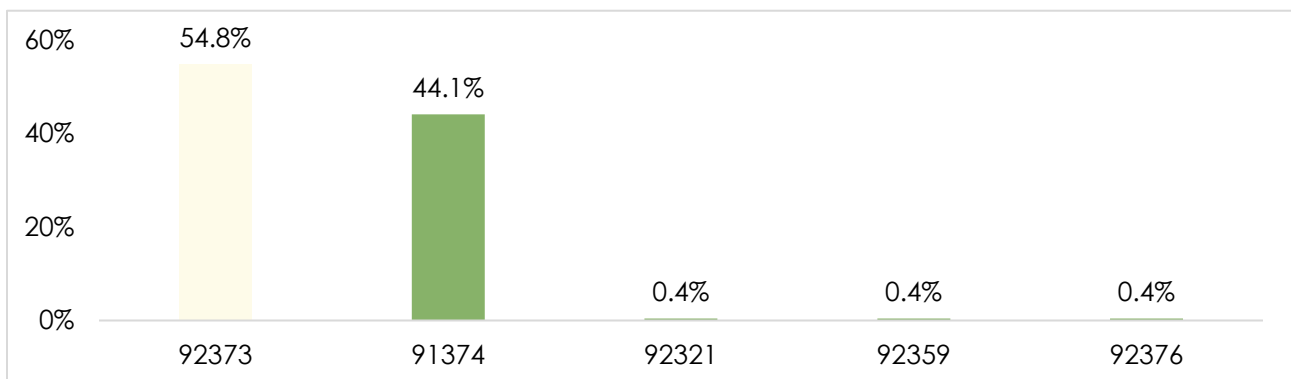
The public participation effort during the drafting of the 6th Cycle Housing Element update included an on-line public outreach survey, stakeholder interviews, and two virtual Community Workshops. Due to the COVID-19 Pandemic, the City took a new approach to meetings, which were primarily held on-line over Zoom. The first Community Workshop was held on Monday, April 26 and had 11 attendees from the public. The second was held on Thursday, May 13 and had six attendees from the public. A further 292 people participated in the on-line survey.

8.1.1 On-Line Survey Results

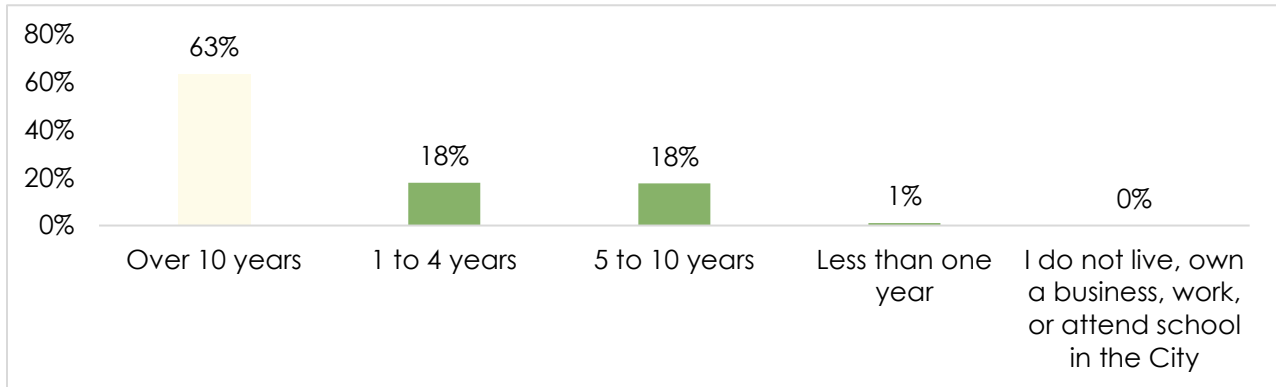
Q1. What is your involvement with the City of Redlands?



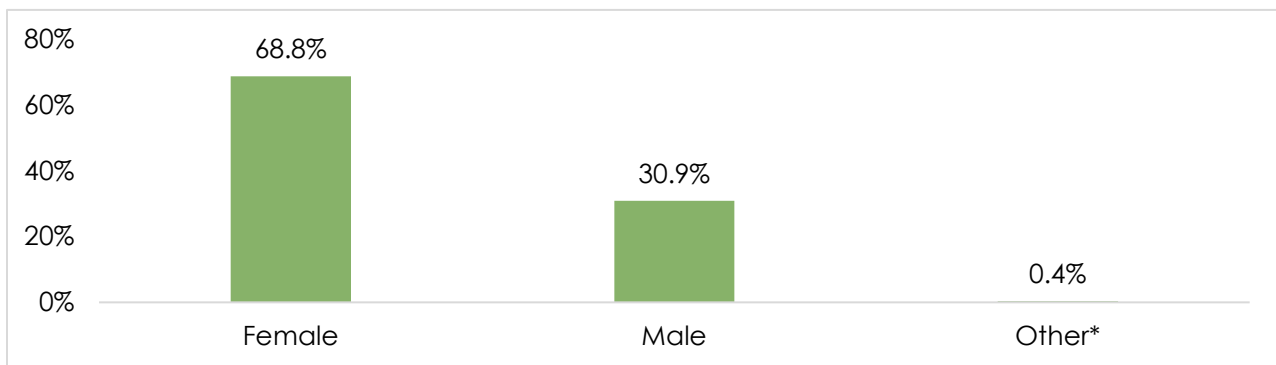
Q2. What is the zip code of your home/business/agency/school in Redlands?



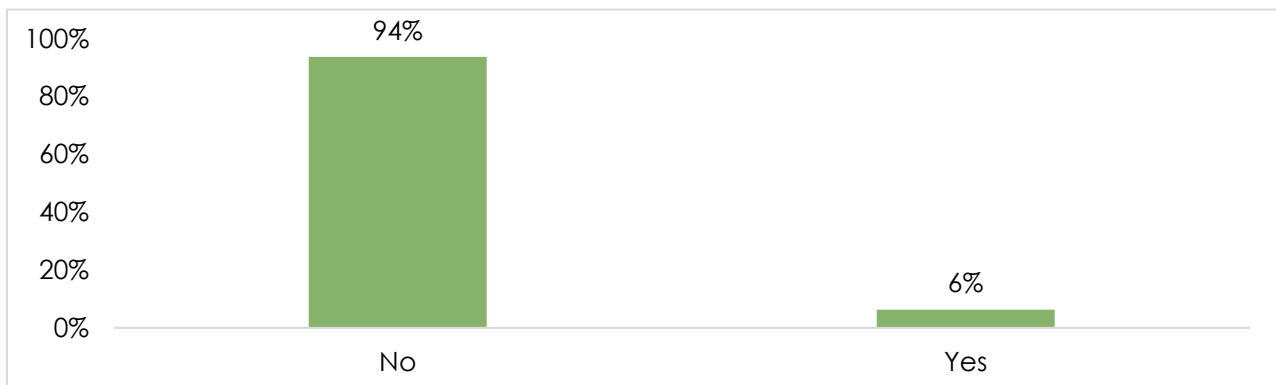
Q3. How long have you lived, owned a business, worked, or attended school in the City?



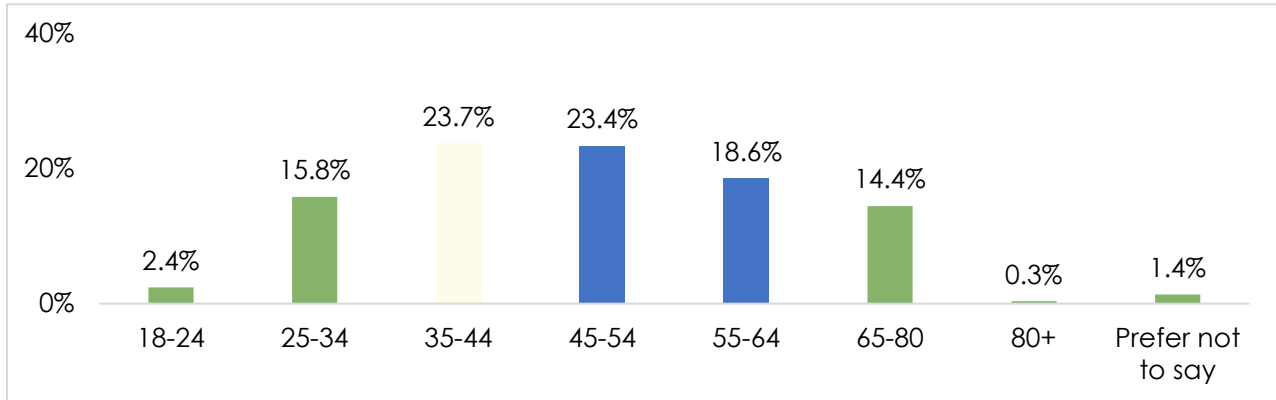
Q4. How do you identify?



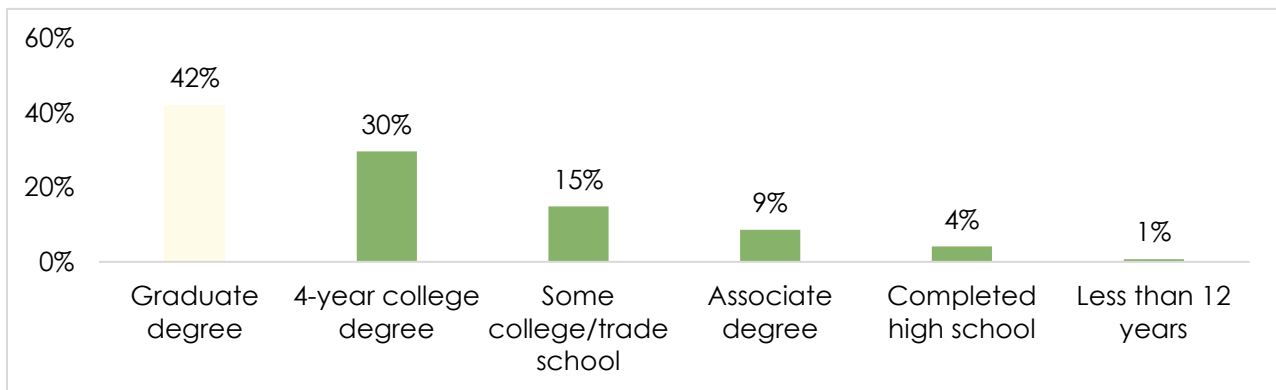
Q5. Do you have one or more conditions subject to the Americans with Disabilities Act (ADA)?



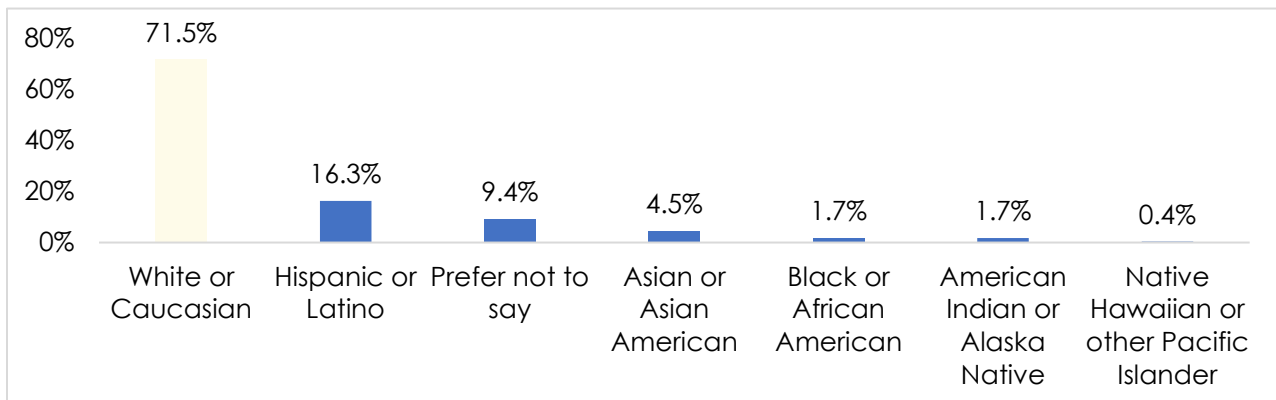
Q6. How old are you?



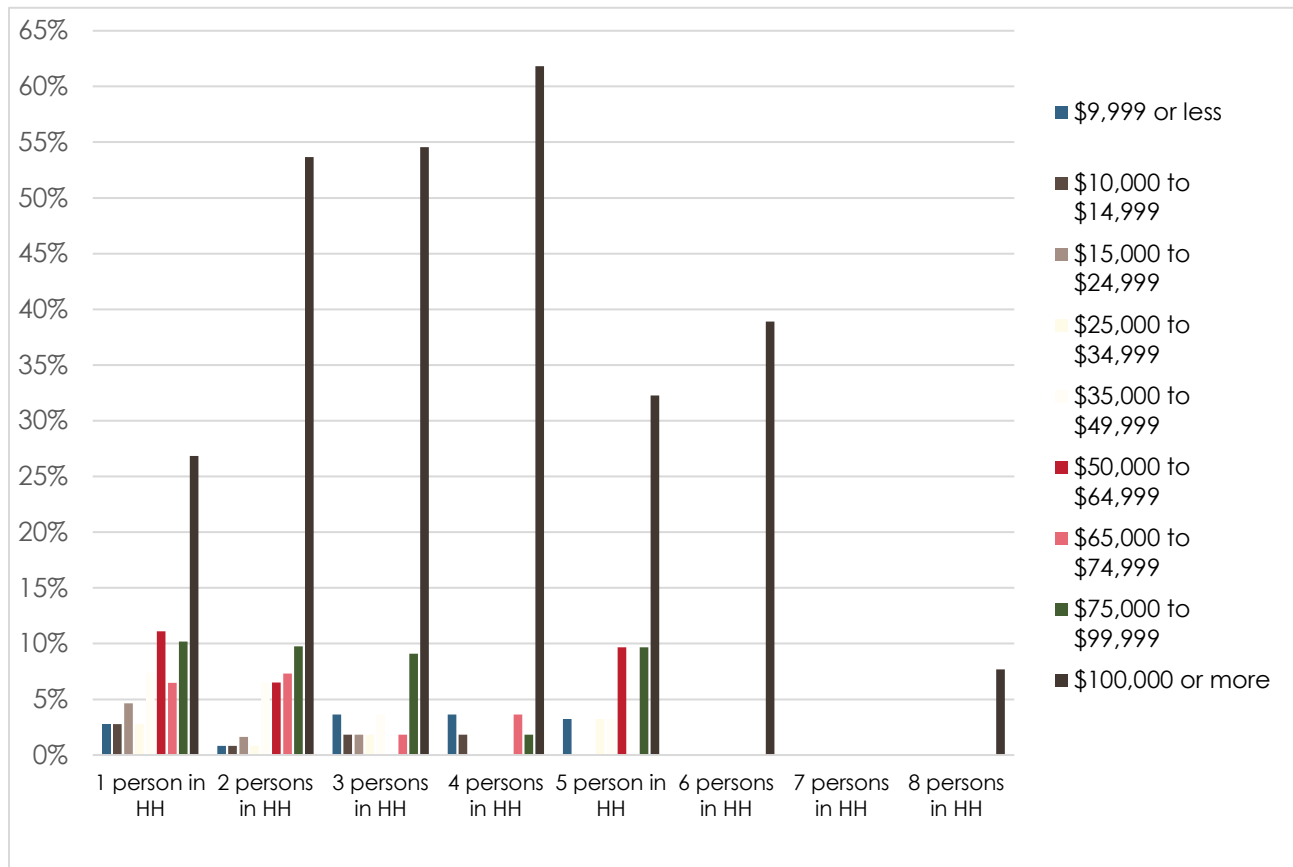
Q7. How many years of education have you completed?



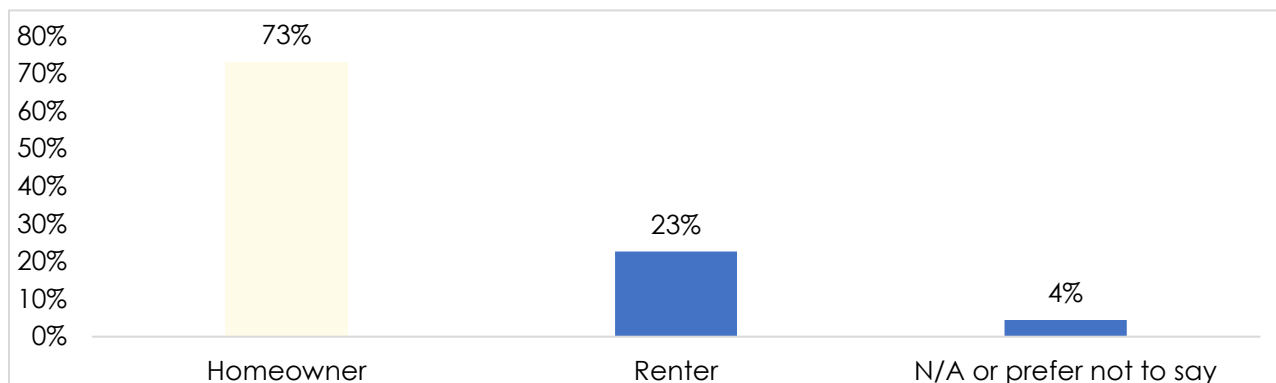
Q8. What is your race/ethnicity?



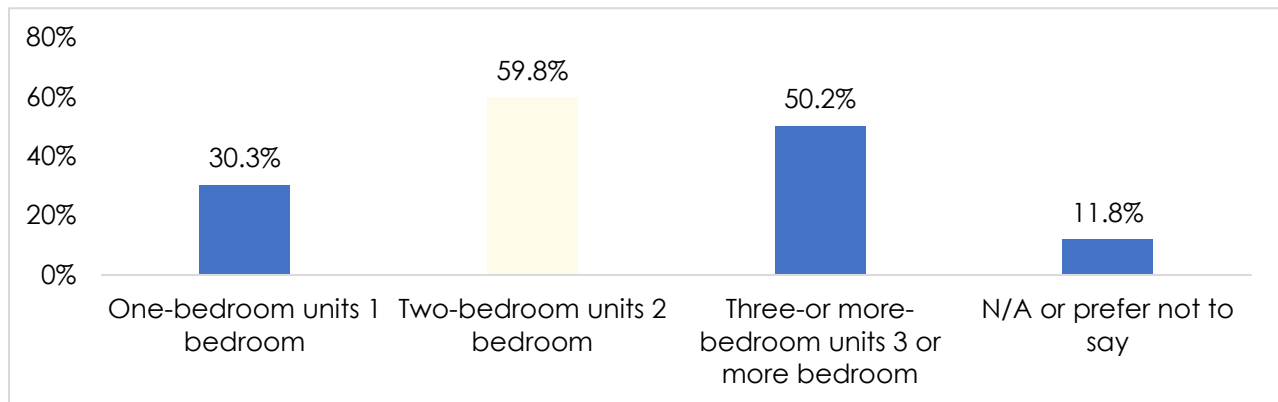
Q9. What is the approximate total annual income for your family, based on the number of people in your household (HH)?



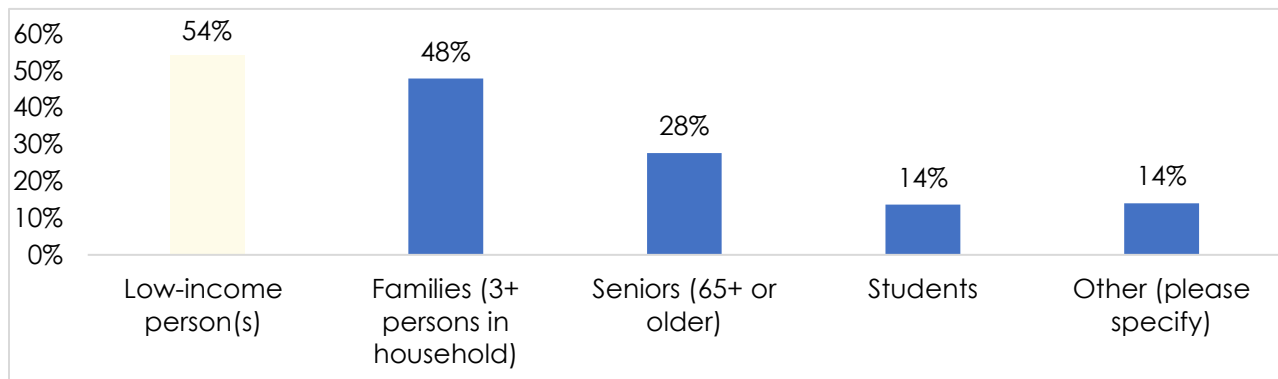
Q10. Are you a homeowner or a renter?



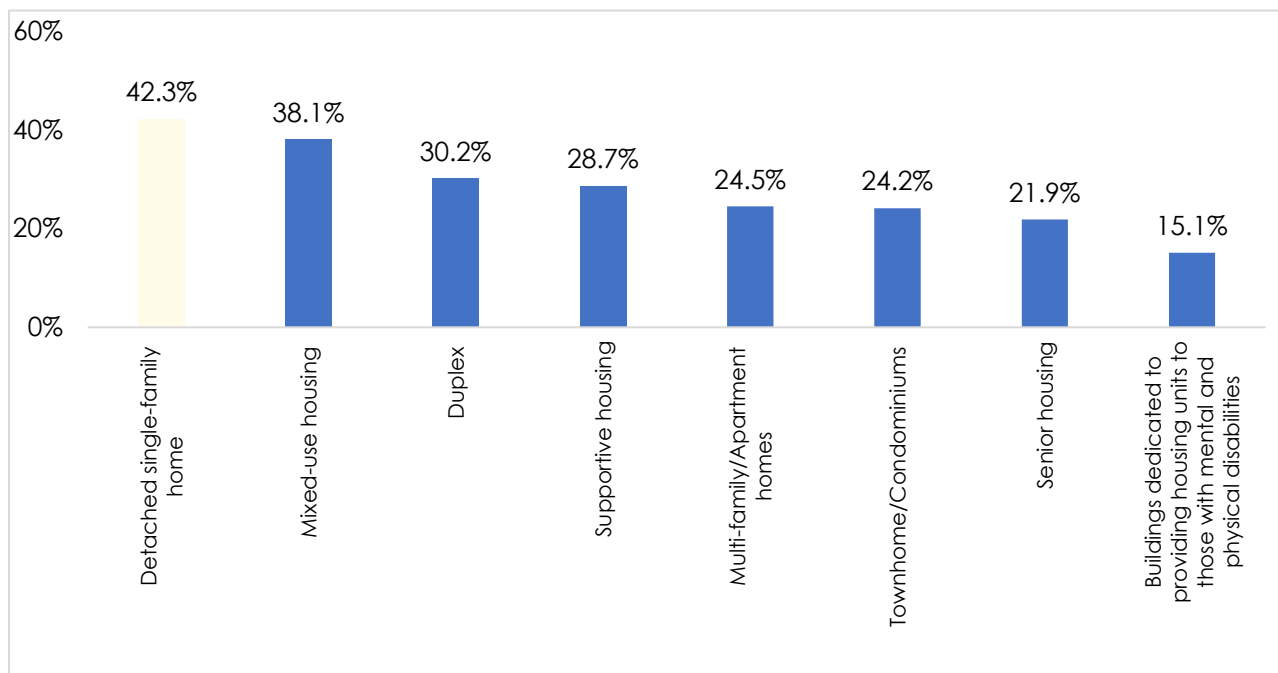
Q11. What size of housing units are most needed in the City?



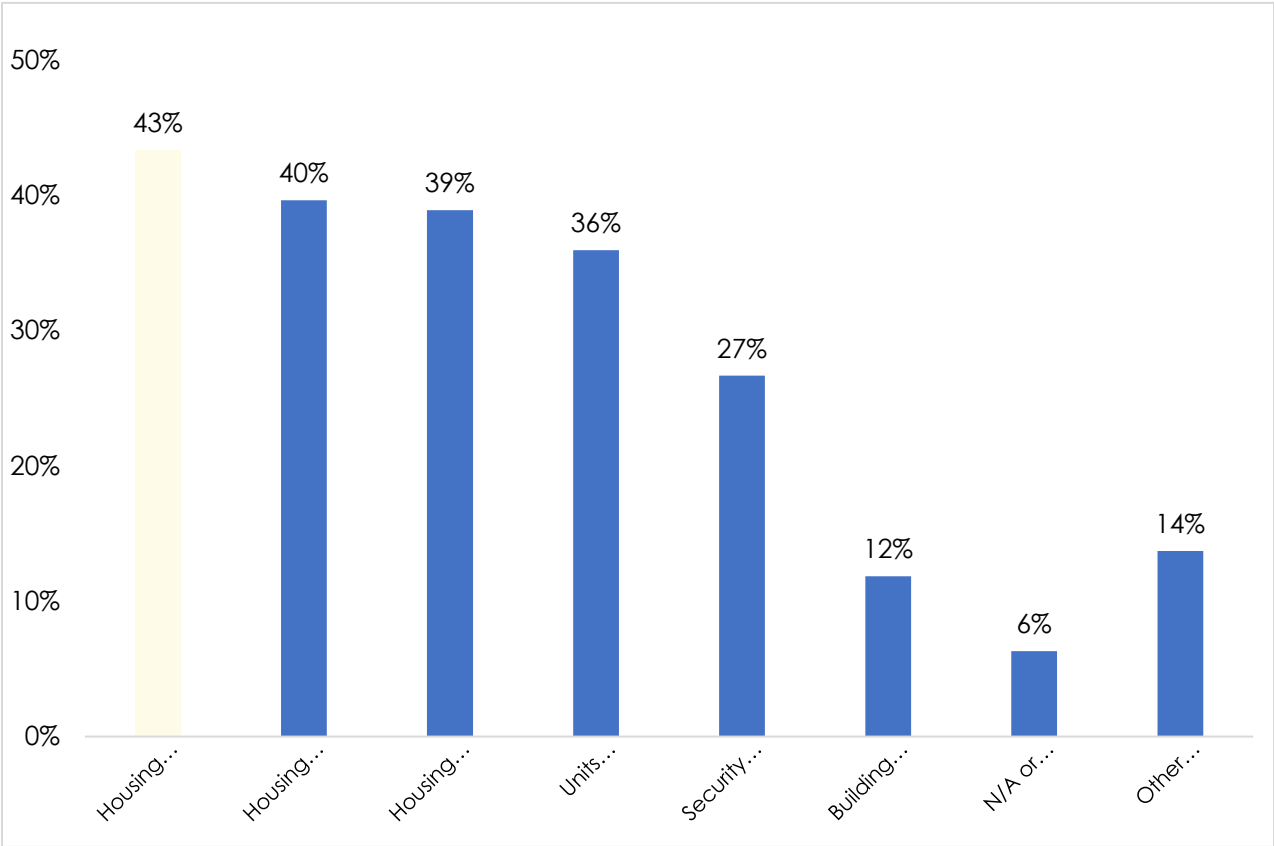
Q12. What demographic do you believe need housing the most in the City of Redlands?



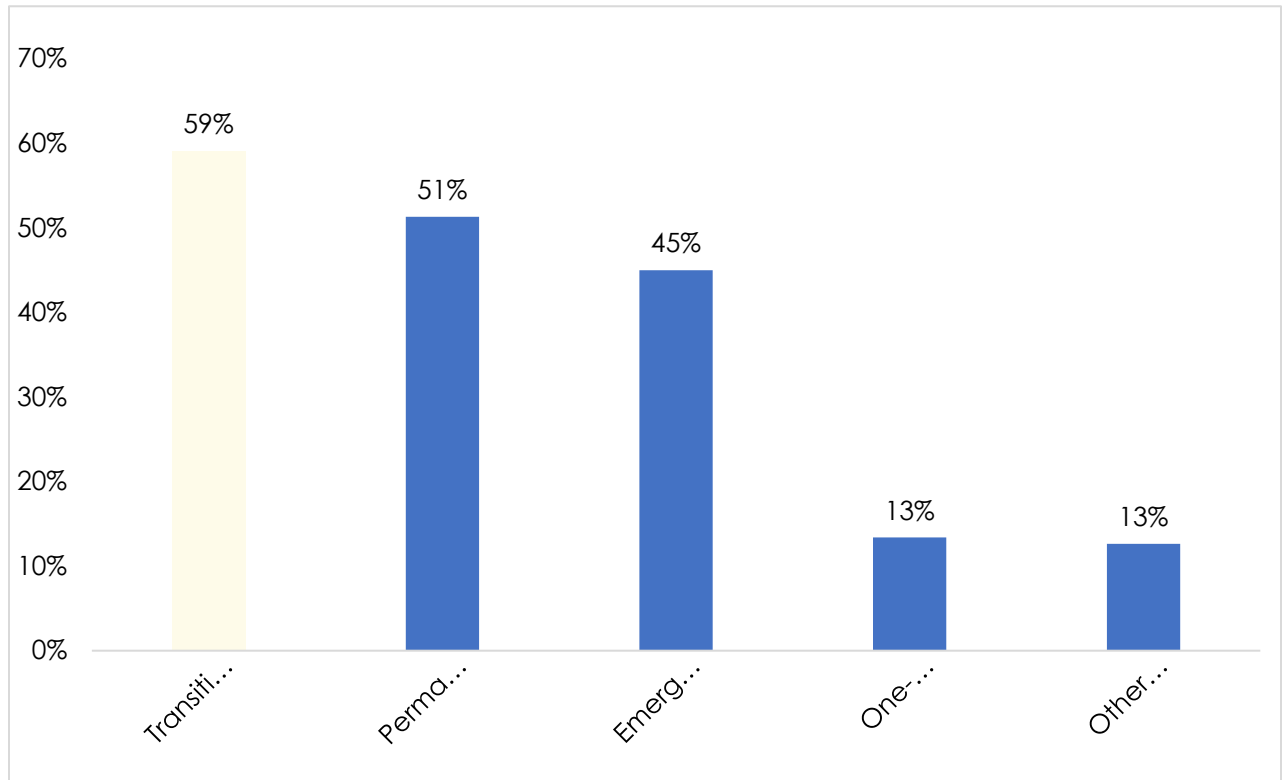
Q13. What type of housing units are most needed in the City?



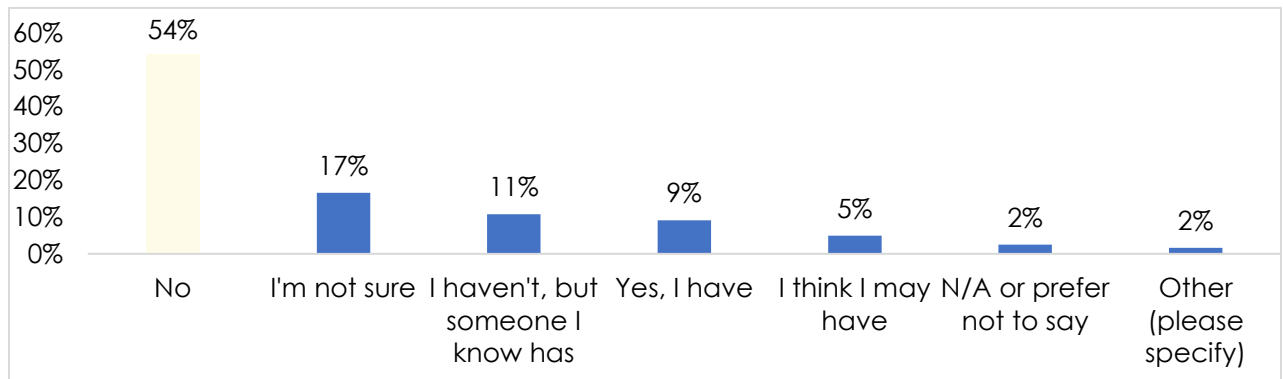
Q14. What housing amenities do you think are needed in the City?



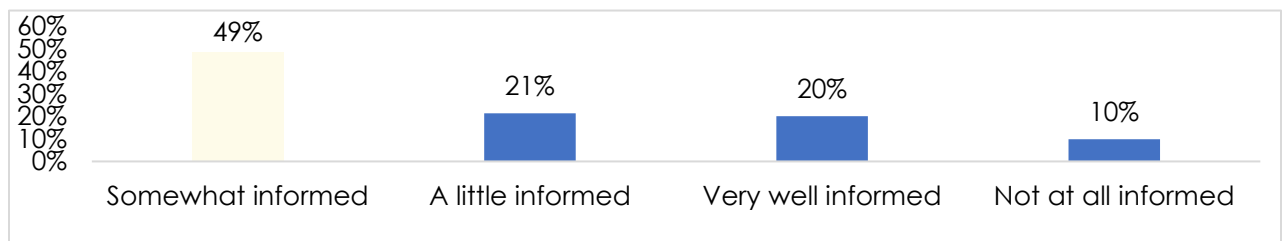
Q15. What are the most critical homeless needs in your community?



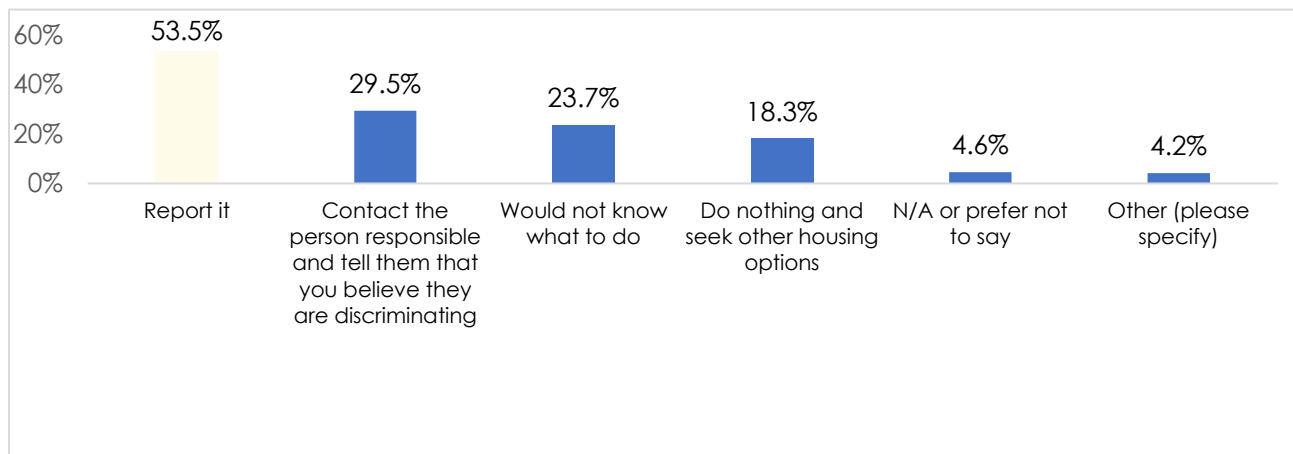
Q16. Have you or someone you know ever encountered any of the forms of housing discrimination?



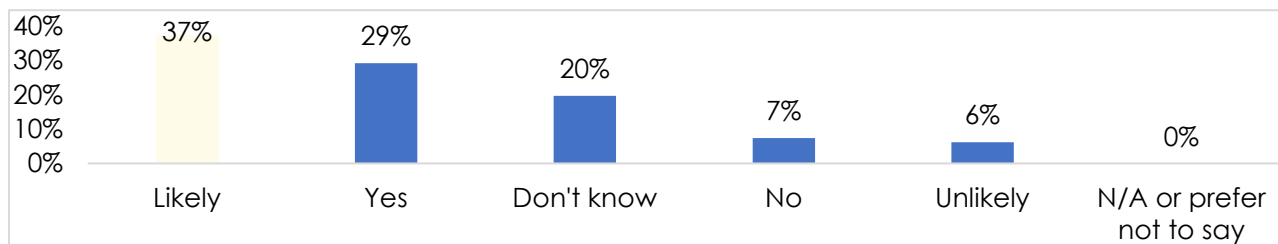
Q18. How well informed would you say you are about housing discrimination?



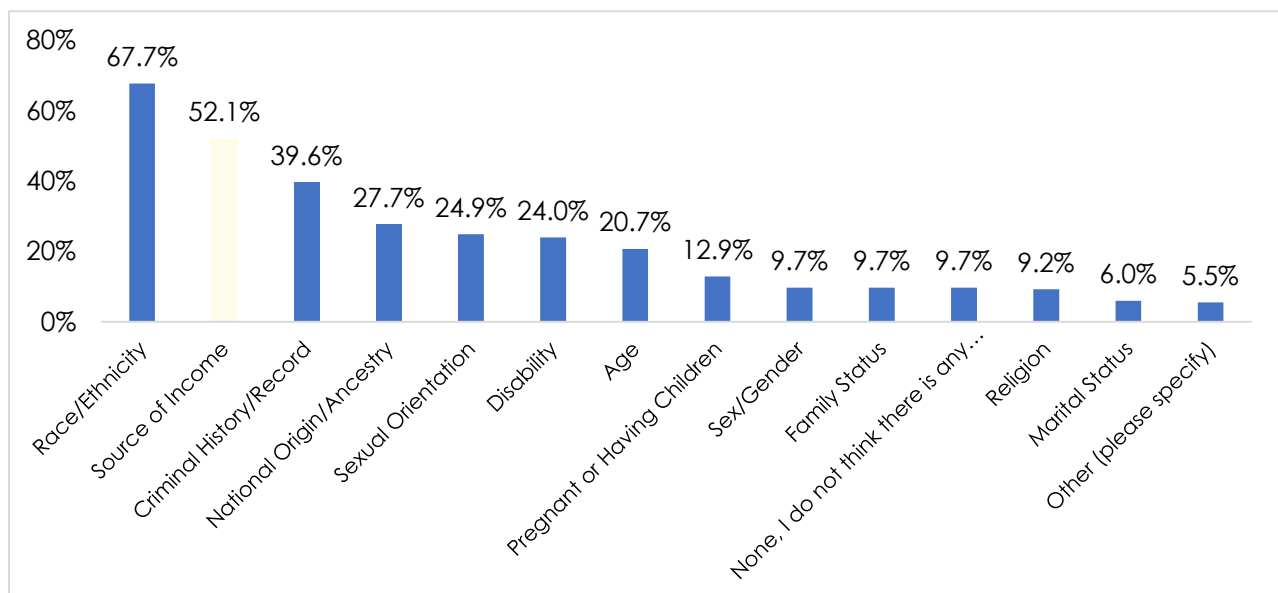
Q19. What would you do if you encountered housing discrimination?



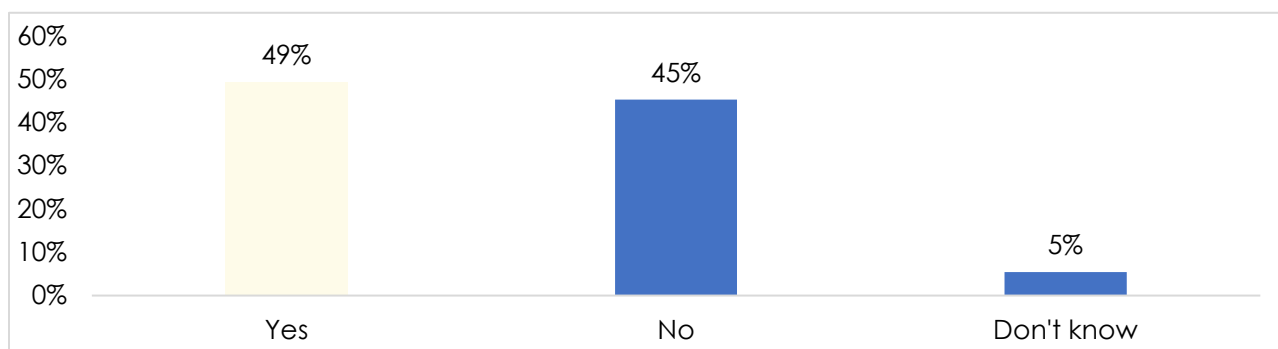
Q21. Do you believe housing discrimination occurs in the City?



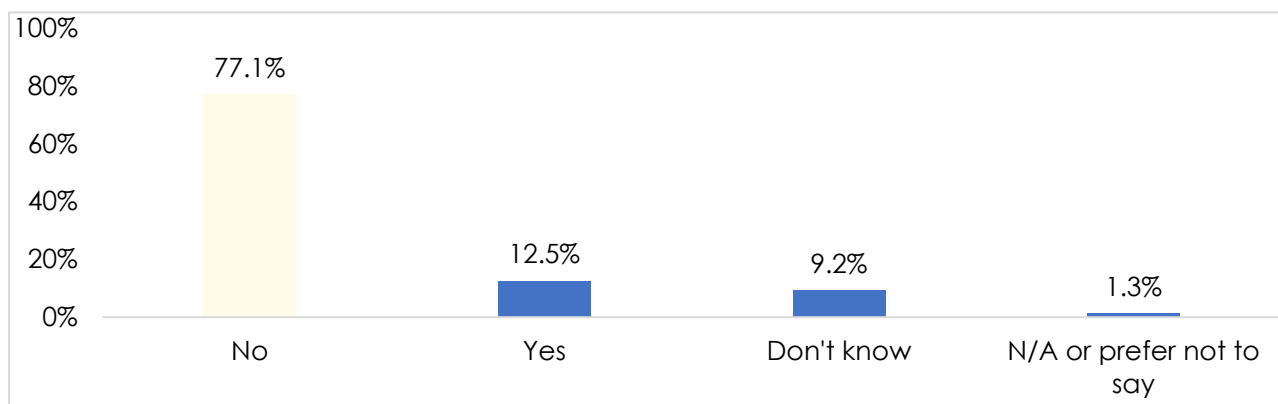
Q22. If you think housing discrimination is occurring, what types of discrimination do you think are most prevalent?



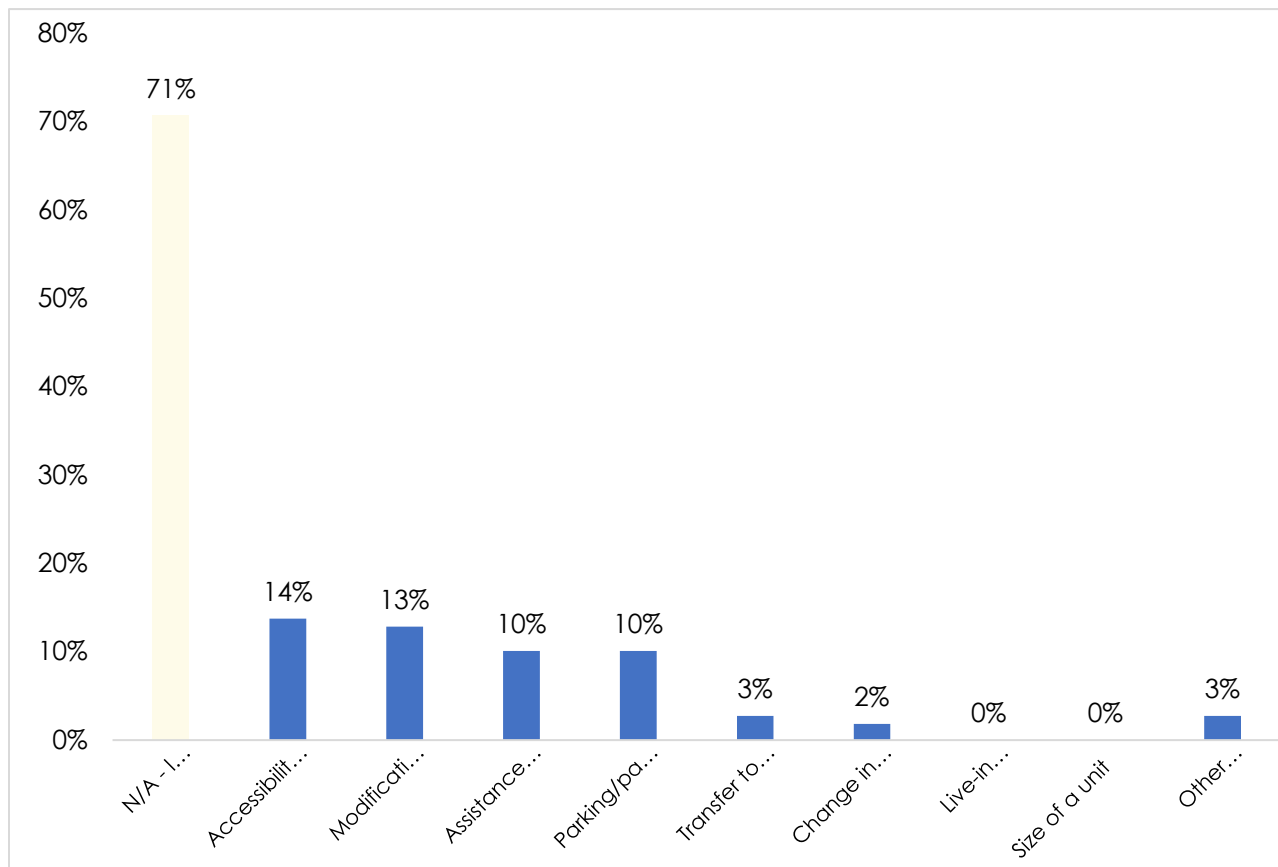
Q23. Were you aware of a tenant's right to request, from a landlord, a physical change to make a home more accessible if necessary due to a disability?



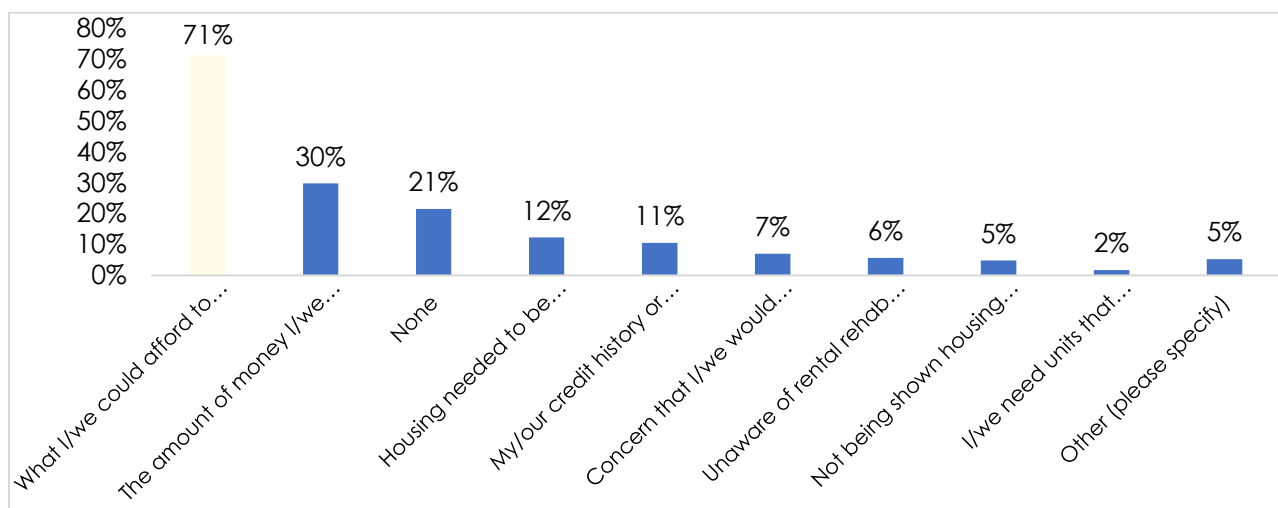
Q24. Have you, or someone you know, ever made a request for a reasonable accommodation?



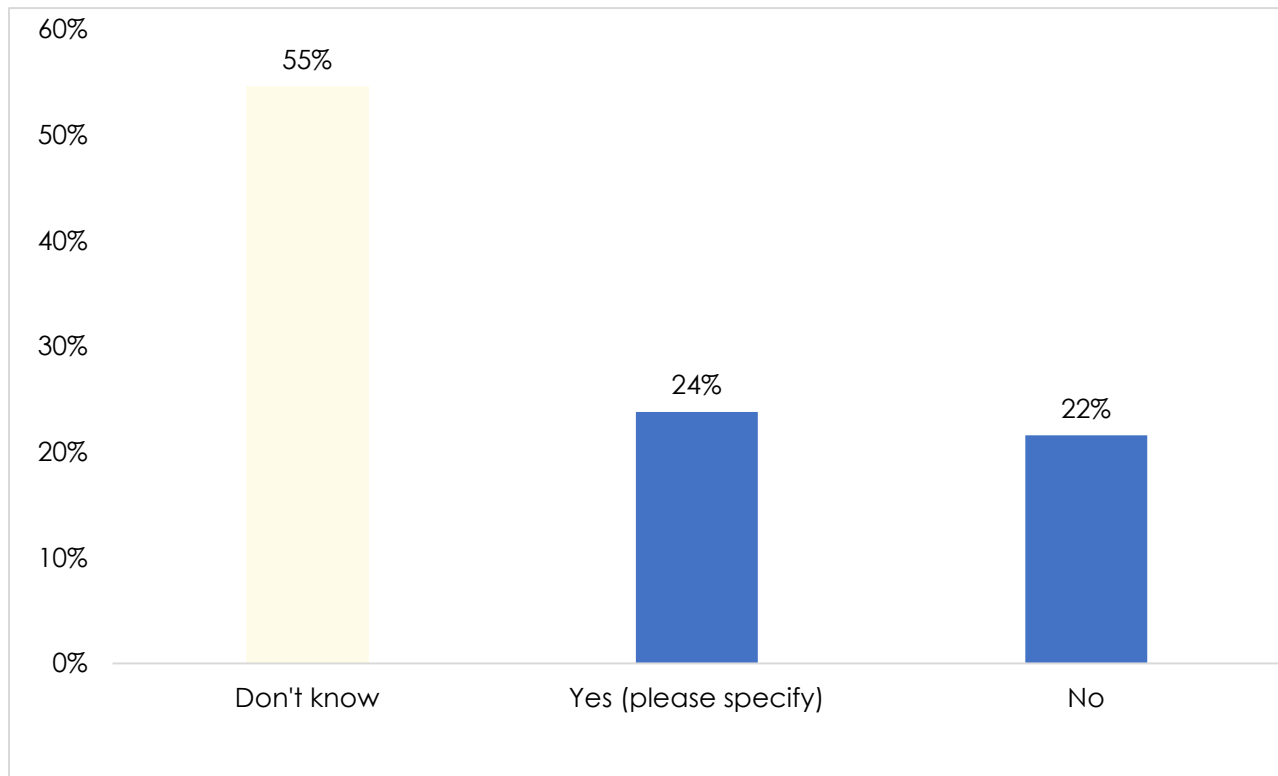
Q25. If yes, what type of accommodation and/or modification did you or the person you know request?



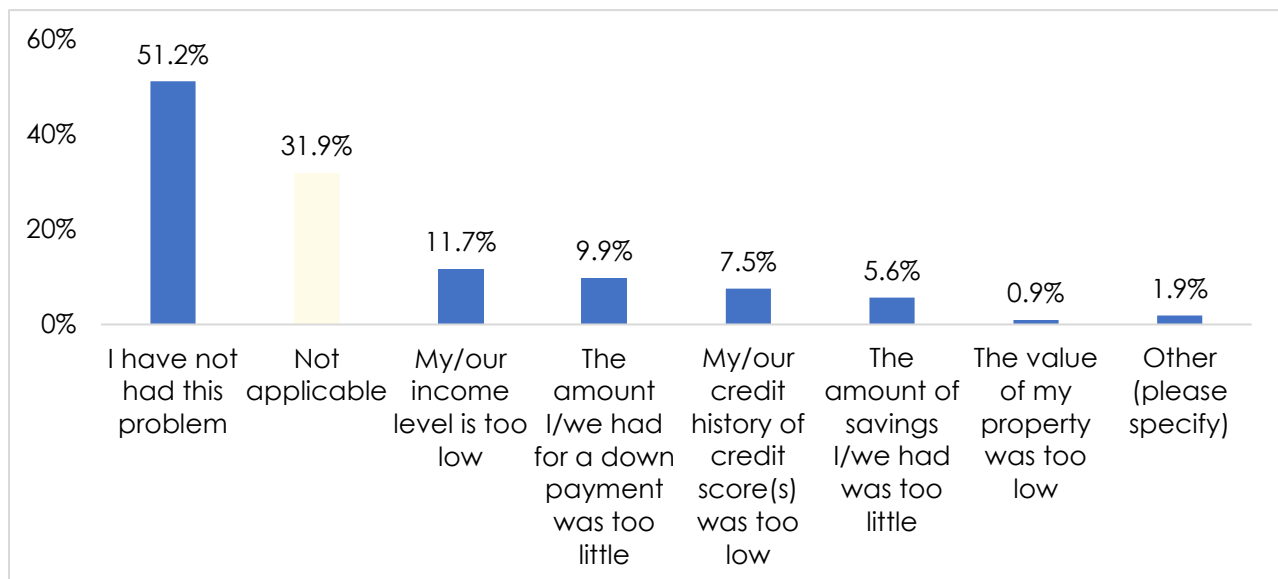
Q27. Which of the following issues, if any, have limited the housing options you were able to consider?



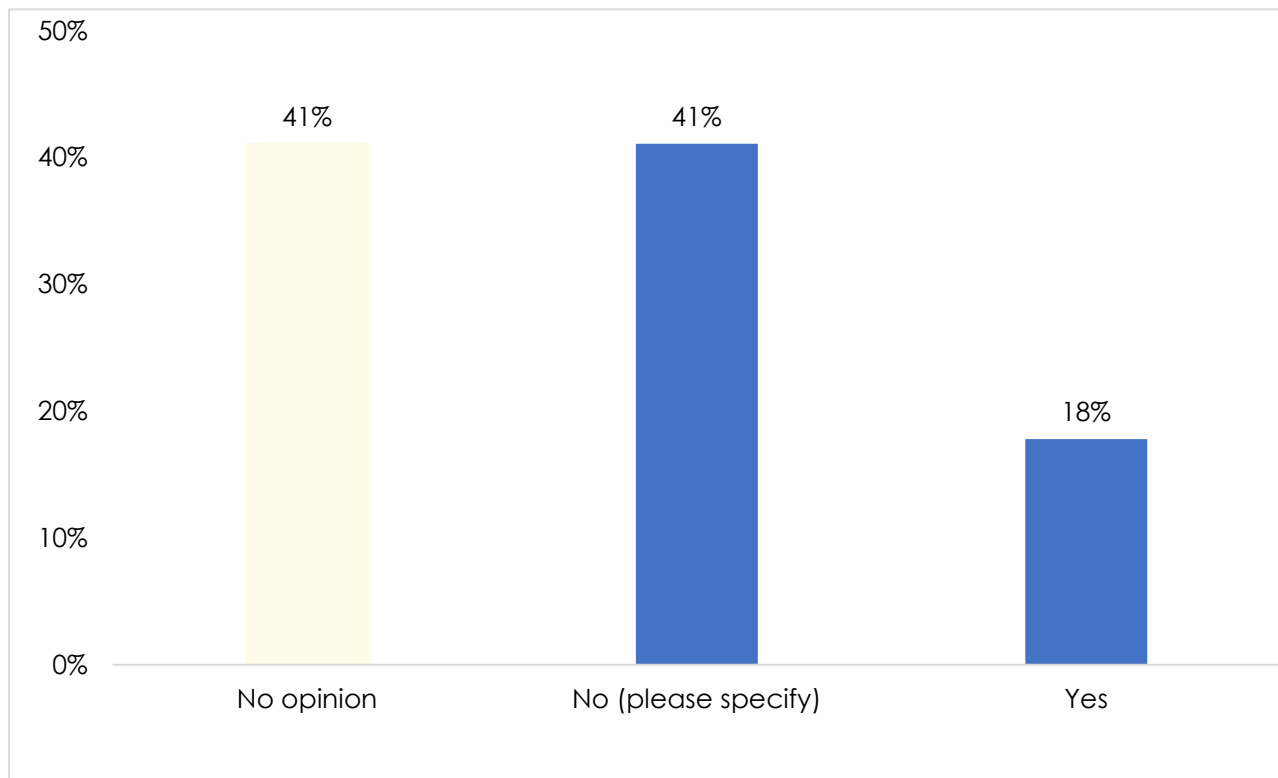
Q28. Are there any housing programs or services needed that you feel would reduce housing issues described in previous question?



Q29. If you think housing discrimination is occurring, what types of discrimination do you think are most prevalent?



Q30. Do you feel local land use regulations support the development of affordable housing?



8.1.2 Stakeholder Interviews

As part of the 6th Cycle Housing Element, the following stakeholder groups were contacted as part of the public outreach process:

- Redlands Unified School District – March 4
- San Bernardino County Homeless Partnership – March 11
- Redlands Area Interfaith Council – March 11
- Family Services Association of Redlands – March 12
- Northside Redlands Visioning Committee – March 12
- Inland Valley Association of Realtors – March 12
- Building Industry Association – March 16
- Inland SoCal United Way – March 18
- Inland Temporary Homes – March 18
- University of Redlands – March 25
- Redlands Chamber of Commerce – March 30

In each stakeholder interview, the stakeholders were asked the following questions:

- Please describe your agency or role in the City?
- What would you say are your agency's top priorities in the next:
 - 1-2 years?
 - 3-5 years?
 - 6 years onward?
- What do you think is the best strategy to build more housing to meet City of Redland's RHNA Goals?
- What segment of the City's population do you think is most vulnerable in terms of having affordable housing?
- How do you think the City can assist those/that population segment?
- What do you think the greatest challenge may be in terms of housing needs for the City?

The responses of each participating organization were as follows:

8.1.2.1 Redlands Unified School District

The Redlands Unified School District (the District) is an educational partner of the City of Redlands. The District believes the best strategy to meet RHNA goals is to look back on past Measures/Ordinances and review its impact on the local community. For example, Measure U affects the District the most. This measure focuses on growth control, but this is a burden on school district because of a decline in enrollment. It is difficult for the District to maintain budgets while meeting enrollment. The District suggests that City Council focus on the socioeconomic status of population and outdated ordinances. The language written in Measure U (specifically Section 1.a.0.b and 1.a.0.c) hinders the District.

The District notes there is a lack of opportunity for young families to move to Redlands. Housing prices as well as single-family developments are too high for young families. The District states there must be more options for young families, such as 3-bedroom apartments.

The District states that the City can assist vulnerable populations through a good socioeconomic plan, and through rezoning or zoning certain areas as multi-use for young families. At present, development pressure is concentrated on the outskirts of town due to a lack of infill development opportunities. The District states that the Planning Department will have to change some of the current zoning. If there are no land use changes, there will be no opportunities for various options. The District understand that Measure U presents challenges, but challenges but is prepared to address those challenges with the City.

8.1.2.2 San Bernardino County Homeless Partnership

The County of San Bernardino (County) Homeless Partnership manages and invests entitlement monies, such as HOME and ESG funds, and allocate them throughout participating jurisdictions. Participating cities may apply for these funds or be assisted through County-funded programs.

The County states that any City should appropriately zone for multi-family uses. Jurisdictions should also be willing to look at non-traditional housing types (smaller units, ADUs, manufactured homes) that may be more cost-effective. For City of Redlands, the County suggests the apply land use while taking into consideration neighborhood characteristics. The City should also be familiar with different partnerships that are available for various funding sources. There are other methods to meet RHNA goals beyond single-family homes with single-family lots (traditional housing).

The County stated that partnerships can assist these populations. There are limited housing resources and partnerships can assist. The County would like jurisdictions lead housing projects (affordable housing or additional housing units), which includes partnering with the developer, partner with the community through the process to add affordable housing stock (community outreach), ~~and~~ and provide financial support (alleviate economic burden). The City can apply what they used to do with the Redevelopment Agency. Instead of treating affordable housing like “any other development project”, they have the ability to guide it through the system.

Finding a balance between new mandates to provide housing and what land is available to absorb these new housing units. This may be met by assisting elected officials and residents explore different types of housing developments that are not considered “traditional”. Through community outreach, similarly to this stakeholder interview, the City can identify areas and places that may be best for new housing units. ADUs may help meet housing goals and provide alternative living situations for various circumstances. There should also be a mutual understanding that housing does not pay for services, so the City should be understanding of the economics associated with units, such as fire, police, etc.

8.1.2.3 Redlands Area Interfaith Council

The Redlands Area Interfaith Council (RAIC) brings groups of people together to interact with one another, acting as an educational group. RAIC also brings in various speakers to these members to inform them what is happening in their community.

RAIC believes the real challenge to building more housing is due to local opposition to low-income housing units. RAIC recognizes that affordable housing plans are ~~needed, and needed~~ and has noticed that many lower-income housing units are placed in one area, specifically the West Area, which exacerbates problems there.

RAIC suggests spreading affordable housing units throughout ~~Redlands, but~~ Redlands but is unsure if voters would pass this. RAIC mentions that there are no shelters or active shelters in the City of Redlands. RAIC believes the most vulnerable population are people experiencing homelessness, low-income households, and young families/single-family households. RAIC occasionally works with non-profits, who are directly engaged with these communities, and knows it is difficult to find affordable housing for these populations. RAIC notes that there is no support system for these individuals and also mentions veterans as a vulnerable population.

RAIC believes apartments are the most affordable way for families to live. However, most of the apartment complexes in Redlands have been controversial. RAIC notes the geographic spread of new apartments, and also states that having walkable neighborhoods would help. RAIC notes that residents of

North-west Redlands do not live close to a grocery store, and that transit opportunities would also be beneficial.

RAIC also believes that the homeless population should be a priority, especially in regard to semi-permanent housing, and states that the greatest challenge will be working with the residents. It has been difficult to bring them on board for housing growth. Redlands residents ~~enjoys~~enjoy the characteristics of a “slow growth” and “small-time feel town”. RAIC suggests focusing on the bigger picture, utilizing more intensive focus groups, increased community outreach, and in-person education. It is also important to remove the image of “outsiders” coming and telling the community what to do—local developers should be involved with development.

8.1.2.4 Family Services Association of Redlands

Family Services Association of Redlands (Family Services) is a small to midsize non-profit that provides emergency housing support, emergency food, transportation assistance, daily meals, bus passes, and education assistance. Their emergency rental assistance program helps fight and prevent homelessness by providing emergency financial assistance to families facing eviction or who are behind on rent.

Family Services states that the core problem is affordability of homes. For minimum wage workers, if they experience a financial crisis (sickness, caregiving, funeral, etc.), it will affect their paycheck and send them “down a spiral”. There is a need for more affordable housing stock. Family Services recognizes that affordable housing is costly and not-cost effective, and states it may be helpful to find a developer to create construction for affordable housing.

The most vulnerable populations are households with children under 18 with fixed income at, below, or slightly above poverty line; people experiencing homelessness; and elderly and disabled individuals with fixed incomes. A recent point-in-time count shows a 95% increase in elderly/disabled individuals experiencing homelessness.

Family Services believes that focusing efforts on creating affordable stock by working with the U.S. Department of Housing and Urban Development or other partnerships can assist these populations. Another way to assist would be providing resources, such as land or financial support. Family Services does not have land, so they work with landlords to get their clients into housing. However, finding housing that aligns with the individual’s budget is difficult due to rising costs of apartments. Thus, families are sharing homes, which leads to overcrowded homes and makes children more vulnerable to sex abuse. Currently, Family Services is in the process of creating the tiny homes and hopes both the City and residents supports this project.

Family Services believes resident perception and resident push back may be the greatest challenge. Currently, the perception amongst residents is that affordable housing will be an eyesore to the community, and that there is a stigma of lower incomes being correlated with “bad people.” Family Services would like to encourage the City to continue to push forward with their efforts for development, especially for vulnerable families. With the COVID-19 pandemic, there is a need for change to develop and have housing stock.

8.1.2.5 Northside Redlands Visioning Committee

The Northside Redlands Visioning Committee (Committee) is a grassroots organization formed after the termination of the Redevelopment Agencies. The Committee believes that, through policy, it may be possible to develop tax credits for developers. This creates an incentive for developers to build affordable units. The Committee also believes easing conditions for approval for housing tracts that are being considered will help build more housing. For example, a percentage of units should be dedicated to affordable units or for various income levels. The Committee urges for new, innovative methods to address housing crisis. For example, creating a First-Time Home Buyer Program will assist in building homes as well as be a starting investment for young families.

The Committee believes the wage earners (blue collar, service industry), unhoused seniors, and people experiencing homelessness are the most vulnerable populations. The Committee feels it should be easier for blue collar workers to live and work in the same city. The Committee would like to see consideration for workforce housing, housing that accommodates regional transportation, and different incentives for First-time Homebuyers.

The Committee feels that the greatest challenge is a lack of access to affordable housing. Another challenge is that developers are not invested in the community. They are tasked to develop and receive fee waivers/incentives. The Committee would like to see investment in the community that is directly applicable to the community rather than for the sake of investment.

8.1.2.6 East Valley Association of Realtors

The East Valley Association of Realtors (EVAR) is a collective association that is engaged in policy making and advocacy, focusing on State and local policies. EVAR would like to focus density in the downtown core area of Redlands. He recognizes that it is not possible to build affordable housing on Sunset Drive. He would like to look at underutilized areas in the City. For example, the Redlands Mall is not a thriving center and there is not much demand for the retail and commercial space. EVAR would like to push for vertical, residential development in the downtown area. Another strategy is to have more mixed, affordable units within the same neighborhood. For low-income households with subsidized housing, it could include more dense development.

EVAR believes the marginal communities in North Redlands, such as lower-income households and people of color, are the most vulnerable. They already live in overcrowded homes or have not been able to pay rent. EVAR believes that people experiencing homelessness with mental health issues as well as veterans are a vulnerable population in terms of having affordable housing.

For moderate-income households, density growth may assist in affordability and may not cost much to subsidize the construction of these units. The possibility to achieve these is greater than developing single-family homes. For low-income households, the City can pursue grant funding and bond funding through State or County funds. This can help subsidize development costs for low-income households. They City can also reform permit processing, streamlining process (which induce significant costs of construction). EVAR suggests that creating flexibility in zoning for underused commercial buildings to be used for residential housing can also assist. For example, a big-box retail space could potentially be converted into a mixed-use or fully residential development. These existing spaces already have the services, such as

electricity, water, and sewer, needed. EVAR states the greatest challenge is the perception residents of Redlands have regarding affordable housing, or housing developments in general.

8.1.2.7 Building Industry Association

The Building Industry Association (BIA) SoCal Chapter is comprised of homeowners, subcontractors, contractors, engineers, trade contractors, plumbers, etc. (people involved in the “home building industry”). Their primary function is to advocate for housing for all socioeconomic levels. They host an annual housing policy conference to provide legislative updates as well as provide a space for collaboration for resources to Cities that may need assistance in local policy reformation.

BIA would like to see the permanent removal of the ballot initiative that capped development to 300 units per year (SB30 for City of Redlands), and agrees with State legislation that came in to require housing. An array of zoning densities may be another strategy to meet housing goals. Diversifying housing stock, especially looking to fortify 4,500 square lots, will assist the City. Other desired items include relaxed design requirements because design fees make it more difficult to obtain/construct housing for people of all financial backgrounds.

BIA believes that low-income population is most vulnerable because it is difficult and costly to build affordable housing, and notes it is also challenging to build when a community does not want additional development. BIA suggests that churches can identify surplus church land can provide an opportunity to do infill projects. Any collaboration is necessary to see available land opportunities. BIA refers to different models (City of Riverside, Placentia, Bellflower, etc.) where they leased surplus property from churches, noting that affordable housing for seniors could be built there. BIA also encourages the City to look at prior examples done by different cities.

Finally, BIA noted there is push back to new development. In terms of addressing the community, it is helpful to conduct quarterly focus groups (working groups) for best practices with the City. BIA currently meets with the City of Ontario on a quarterly basis to have a dialogue about fees, delays, etc. so both parties have a mutual understanding of the development process.

8.1.2.8 Inland SoCal United Way

Inland SoCal United Way (ISUW) is comprised of three organizations that have merged (United Way of the Inland Valleys, Inland Empire United Way, and Community Connect). ISUW states that educating the public will best assist the City to meet their RHNA goals. NIMBYism is prevalent, and ISUW feels that educating the public will help shift public perception. ISUW states that meeting cost of living wages will greatly assist in housing. They both agree that living wages correlate to housing.

ISUW feels that the most vulnerable populations are those in extreme poverty. ISUW would like to address homelessness by avoiding homelessness in the first place. ISUW would like to see if businesses could be encouraged via credit to hire folks with that living wage. This leads to re-investment into the community and community building. Workers would be able to live and work in the City. ISUW states that there are available funds for rental assistance and should allocate these funds to assist housing issues. Another way to assist these populations is to build affordable housing.

ISUW identified challenges to housing production that included difficulty in construction, whether due to permitting or with construction delays. Another challenge is the counter intuitive policies set in place.

8.1.2.9 Inland Temporary Homes

Inland Housing Solutions (IHS) is a non-profit organization that provides rapid rehousing services, emergency rental assistance, and are service providers for people experiencing homelessness. IHS believes the best strategy is by addressing the need for affordable housing development and to be in agreement with strategies laid out in the County of San Bernardino. IHS states that the City needs to be more strategic in placing affordable housing. They should place these units in areas that are undeveloped. For example, scattered site housing should be implemented, instead of place all affordable housing units in one area in the City. IHS also would like to advise that additional housing requires additional services, such as police, safety, roads, commercial, etc. so the City should be strategically while taking all these aspects into consideration.

IHS believes that the low-income earners are the most vulnerable population. According to IHS, Redlands is comprised of services, hospitality, and retail sectors who make minimum wage. It is difficult to matai cost of living with minimum wage jobs, and Redlands becomes cost prohibitive if the individual is the main provider for the family.

In terms of housing, IHS believes the City should utilize the current housing they have and utilize underdeveloped/undeveloped and that a city cannot build their way out of homelessness. IHS believes that having a study conducted that gathers information regarding homeless individuals, such as where they originated, if they are Redlands locals, and if they attended Redlands High School. This can feed into marketing to change public perception. This can also feed into the targeted populations and how to address their specific needs. IHS suggested that the City could possibly create three models that are pre-approved which relates to faster, more accessible construction of ADUs. The City can also assist in allowing easier permits, fast-track processes, and flexible plan checks to expedite ADU developments. IHS stated the greatest challenge to new housing in the City is the restrictions due to environmental land and the building affordable housing with requisite services.

8.1.2.10 University of Redlands

The University of Redlands (UofR) is a private institution for higher education with approximately 5,000 students. They are located in the TVSP and own approximately 30 acres of undeveloped land. The UofR would like to push a mixed-use village, not so focused on university house, for the transit-oriented station that aligns with the goals of the City of Redland's TVSP.

UofR believes the best strategy is through redevelopment or infill development of sites such as the Redlands Mall and University Village Site. Garden style apartments and single-family homes seems to be more accepted by the public. There is also potential in the under-utilized spaces in Downtown for the City to meet current housing goals. Three-to-four story buildings were stated as the best fit for character of Redlands.

UofR believes that breaking down the barriers for housing for ~~low income~~low-income households are required. There is a need to increase the supply for housing that is attainable to the 50-80% AMI

population. Expediting approval processes and improving policies that can specifically target and address these issues can be helpful. For the lower-income population, there are tax credits and bonds that are currently assisting their needs.

Public perception is a challenge in terms of housing needs. Educating the public and helping them understand that density is not equivalent to high-rises will be greatly helpful in public acceptance. Another challenge is the growth control measures and its corresponding impacts to development. Instead of removing growth control measures, revisions and reformed are required. UofR is also concerned about the flood zone affected development, due to the increased cost of mitigation.

8.1.2.11 Redlands Chamber of Commerce

The Redlands Chamber of Commerce's (Chamber) mission is to advocate for local businesses and help create a better business environment. The Chamber states the demographics of the community has shifted. In the Chamber's experience, many households are not looking to buy a home. With that, the Chamber notes that density can help the City meet their RHNA goals, and that the TVSP be ideal if development is done correctly. The Chamber notes there is not much land left for development under current zoning. Re-zoning of commercial sites could hurt the local businesses.

The Chamber notes that North Redlands consists of mostly minorities, while South Redlands is mostly white. The Chamber also notes that most of the service providers and non-profit organizations are located and serving the Northside. The Chamber broadly states that housing credits to certain populations can assist with those vulnerable populations obtain housing, and that anything would be helpful versus doing nothing.

The Chamber recognizes that one of the greatest challenges is identifying where to build future housing. Infrastructure poses another challenge. For example, public transportation is available in the City of Redlands, but is not located near the underserved population. It is difficult to reach current, existing bus stops to where they are currently located. The "Donut Hole" (unincorporated Redlands) has higher density for housing, has existing public transportation, and apartments with amenities. The Chamber would like to see some of those aspects incorporated into Redlands proper, specifically within the TVSP. The Chamber notes the southern portion of the City would be a perfect location for housing because infrastructure (roads, electrical lines, gas lines, etc.) is already available in that area.

Public perception can be a challenge, but the Chamber believes this challenge can be ameliorated. The Chamber notes there was discord between the public and Council with Measure G (redevelopment of the Redlands Mall). The public advertising created only addressed one item, rather than the five items. The Chamber believes Measure T was supported because it was developed through a citizen oversight committee. While a committee can only provide recommendations to the City Council, a committee may help the public lend more trust in future housing and land use related measures.

8.1.3 Community Workshops

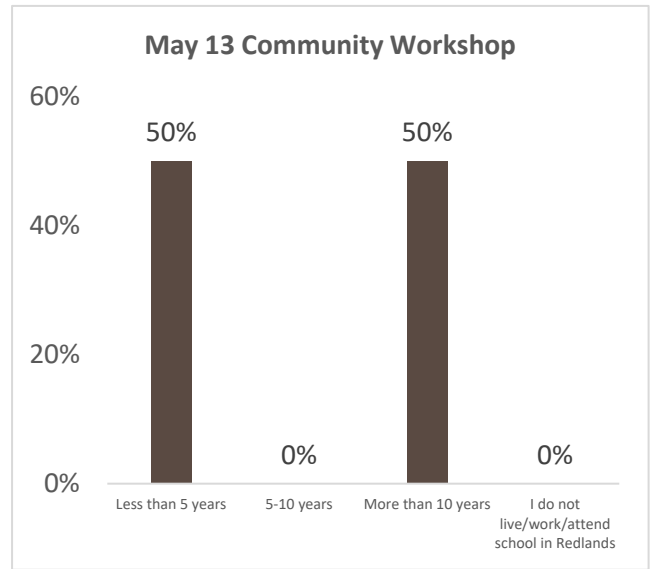
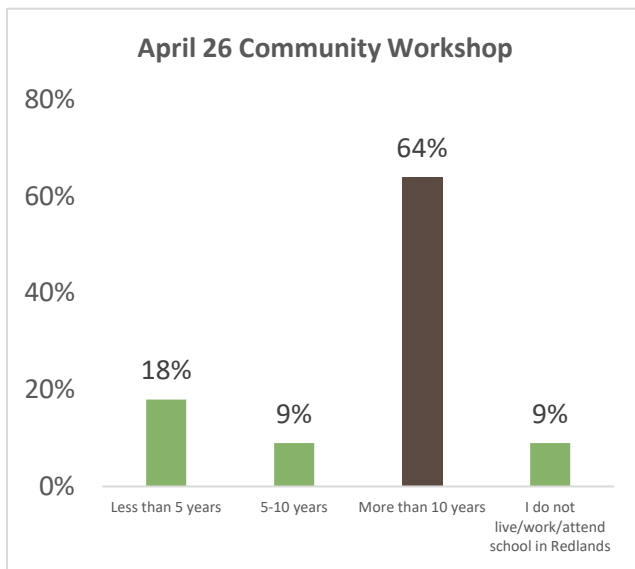
The City of Redlands held two Community Workshops for the Housing Element Update. The ~~first one~~first ~~one~~ was held on Monday, **April 26 and had 11 attendees** from the public. The second one was held on

Thursday, **May 13** and had **six attendees** from the public. The public asked several questions regarding the Housing Element update at both meetings.

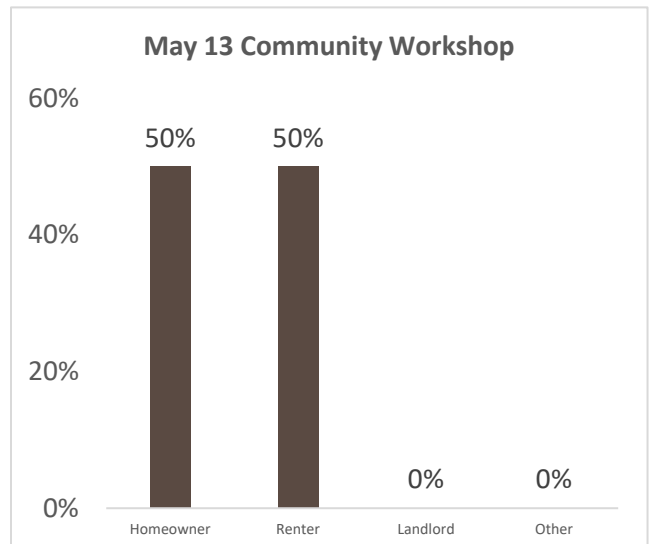
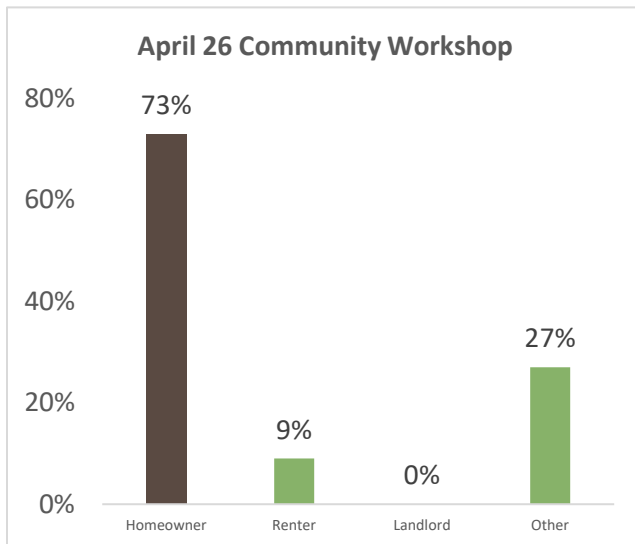
8.1.3.1 Survey Questions at Community Workshops

Below are the survey questions provided to the participants at each workshop, followed by questions the participants asked in the Workshops Q and A boxes.

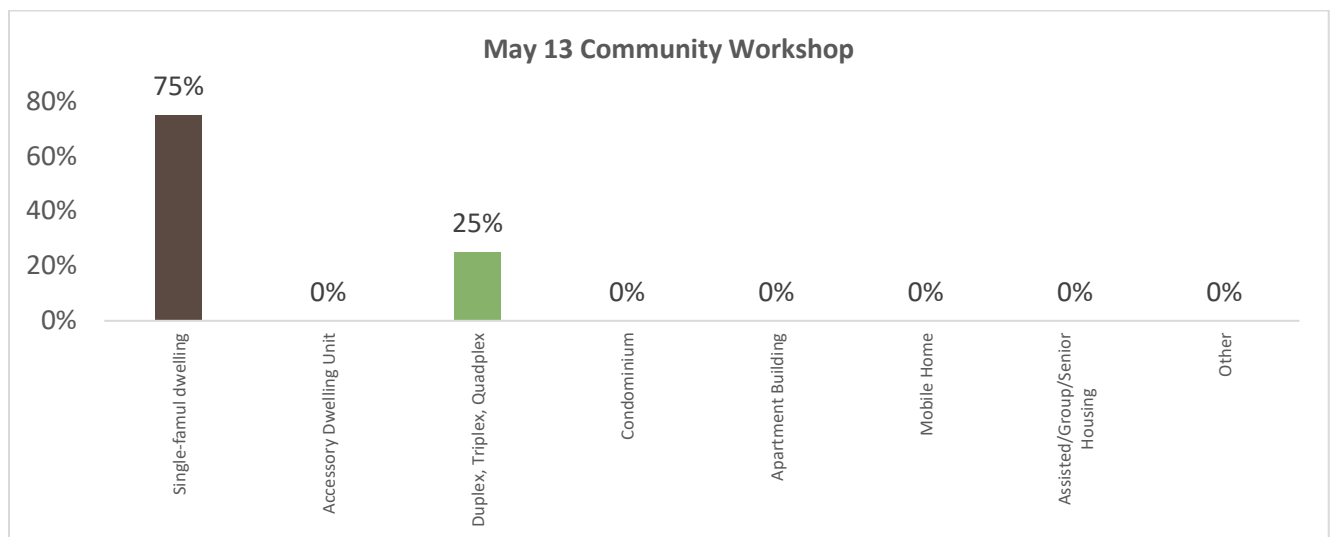
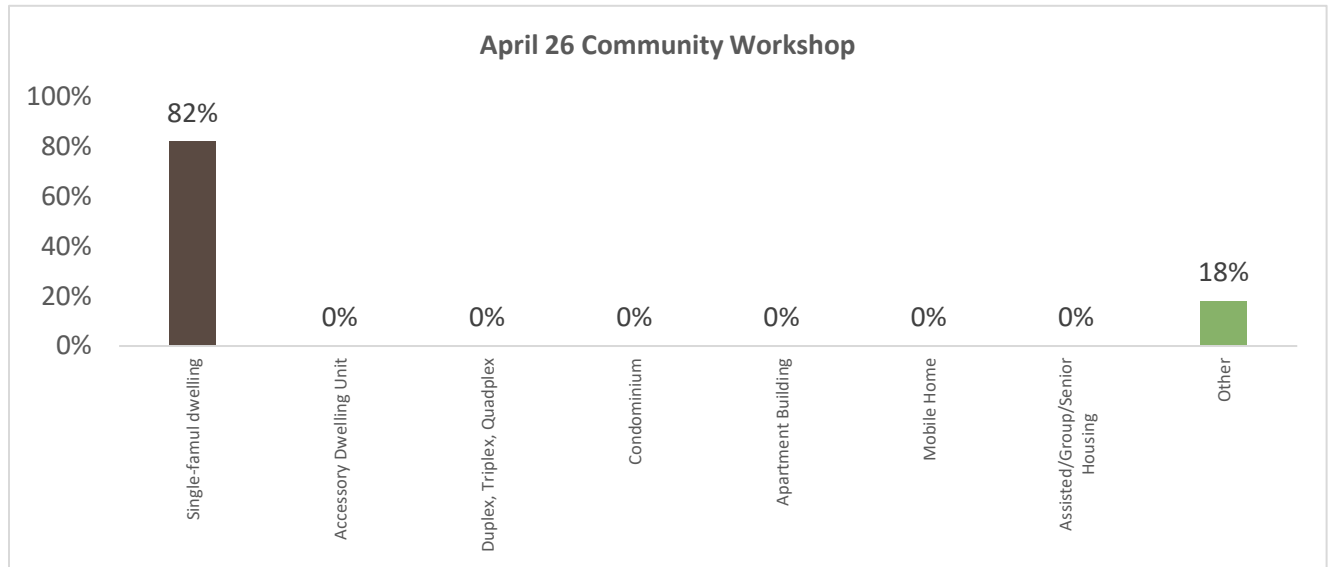
How long have you lived/worked/attended school in the City?



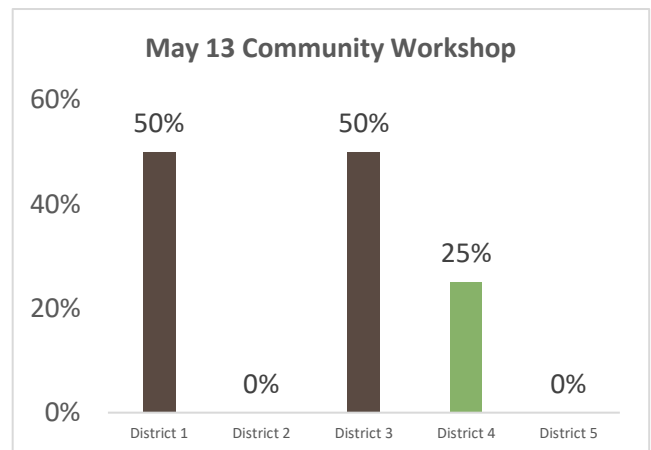
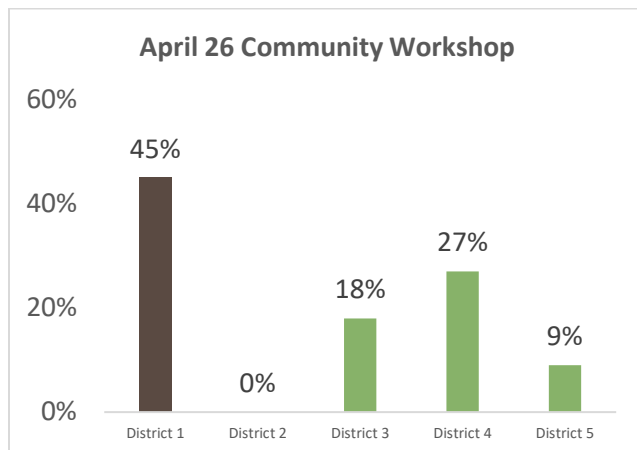
Are you a homeowner, renter, landlord, or other (please select all that apply to you)?



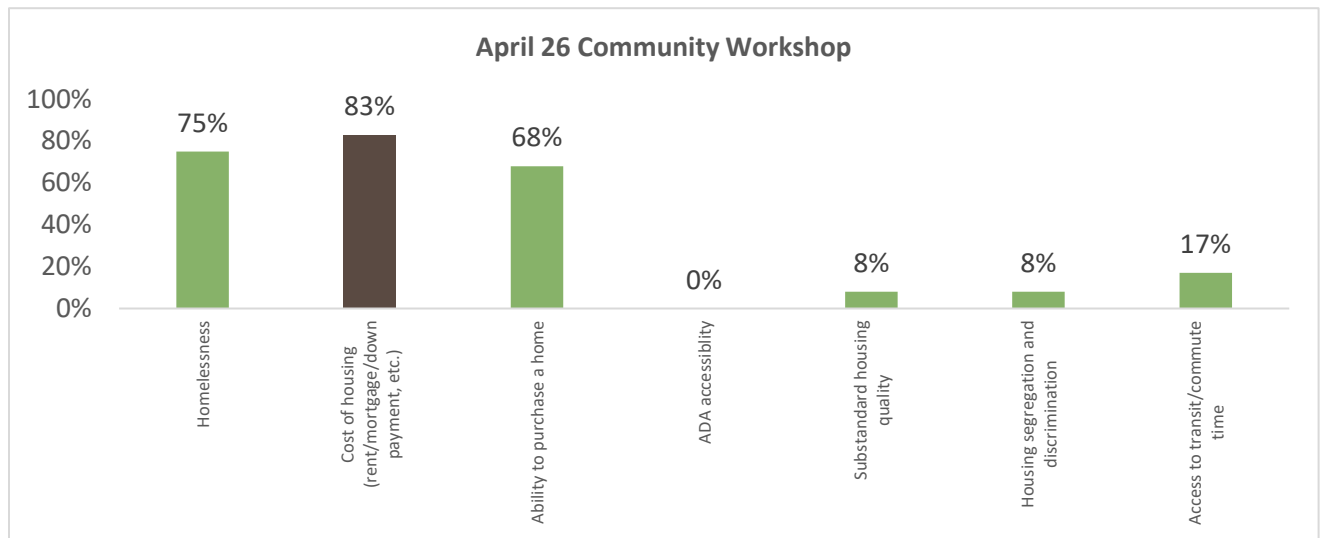
What type of housing do you live in?



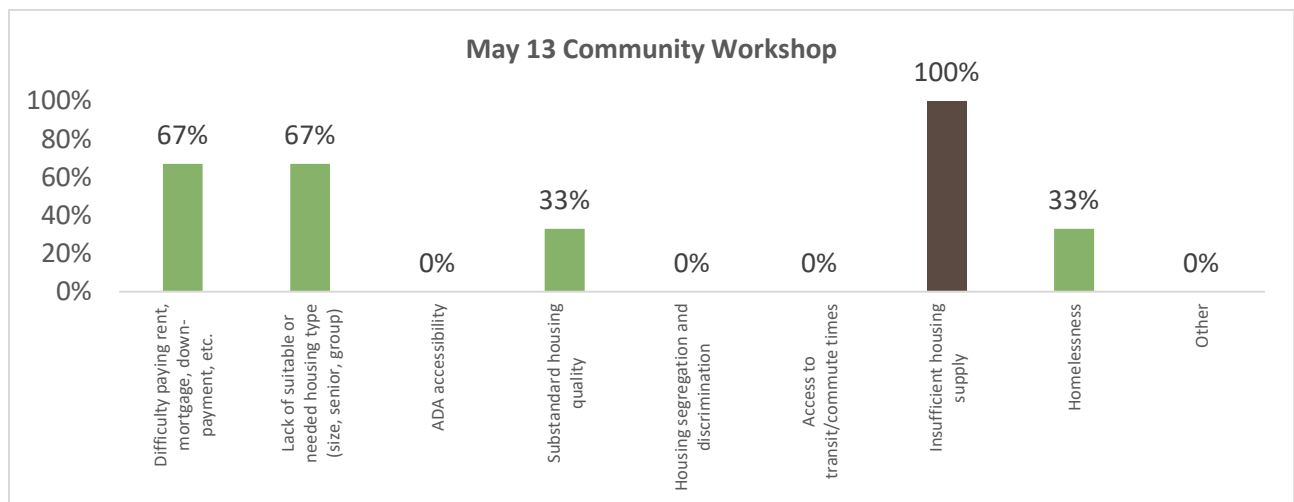
Where in Redlands do you live?



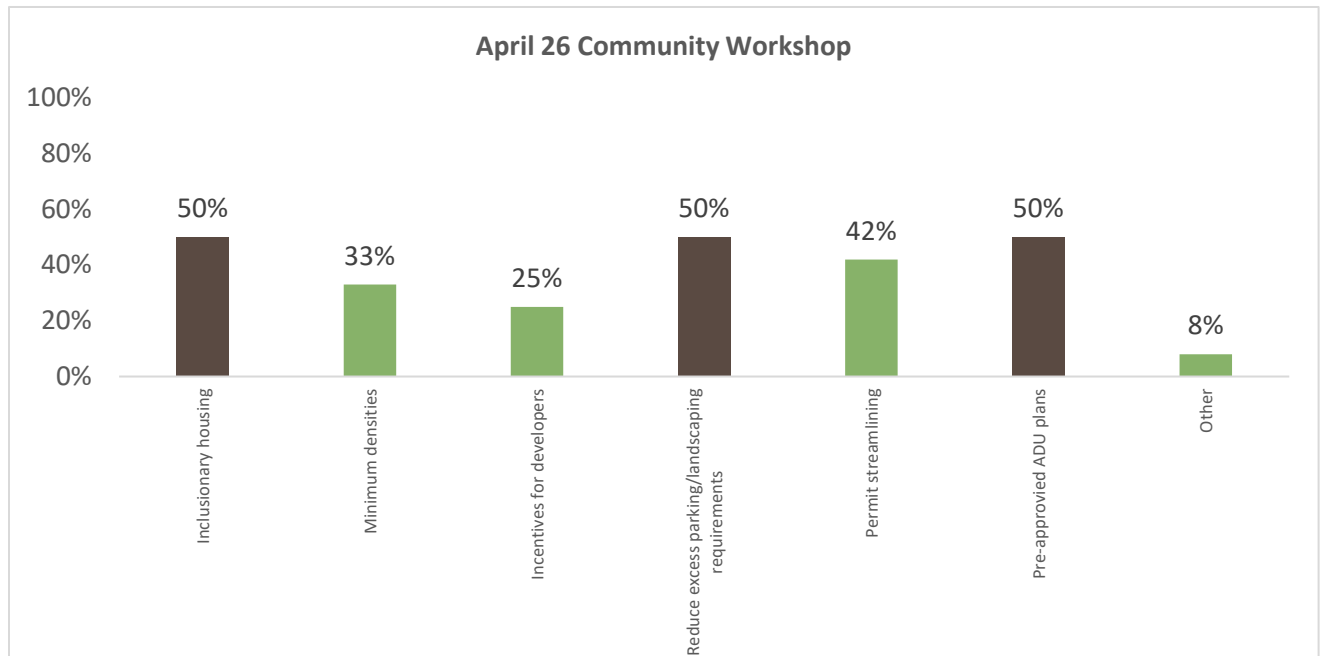
Please select the top three (3) housing issues facing people in the City of Redlands (multiple choice).



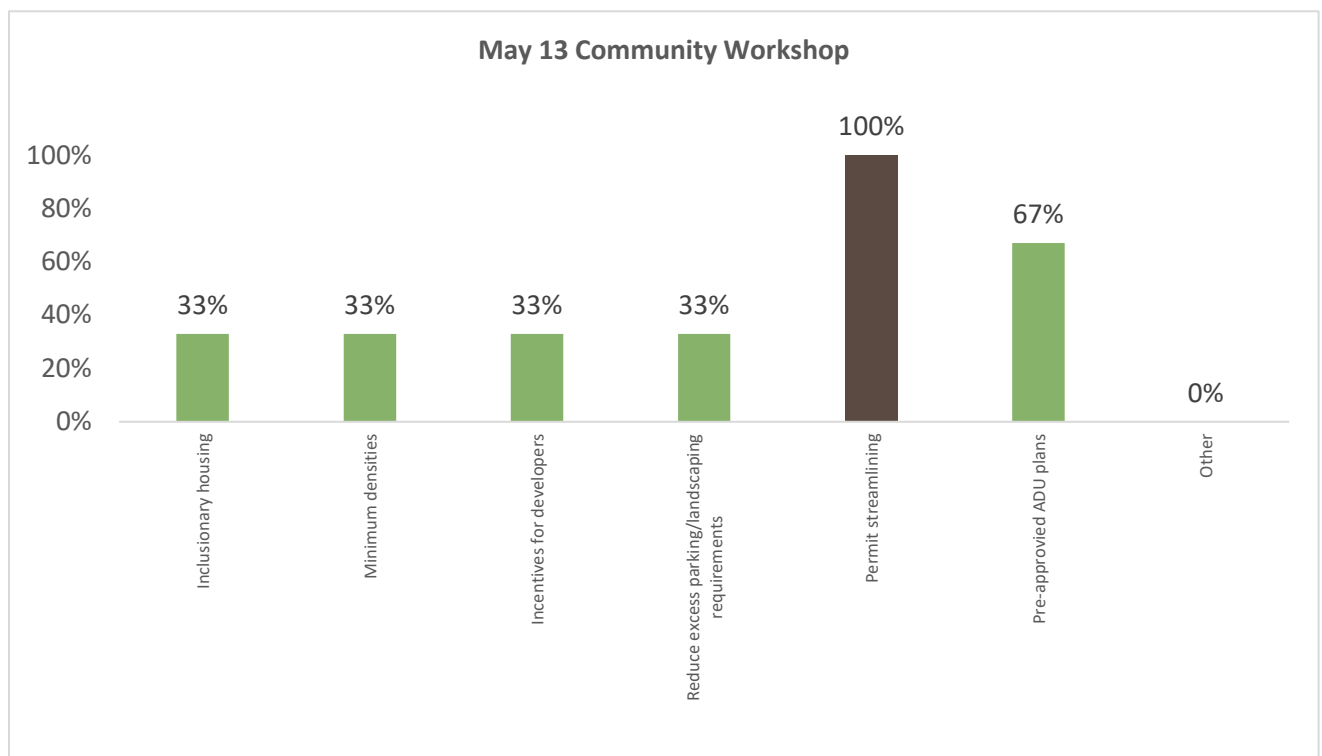
8.1.3.1.1.1.1 Other: Housing close to local jobs



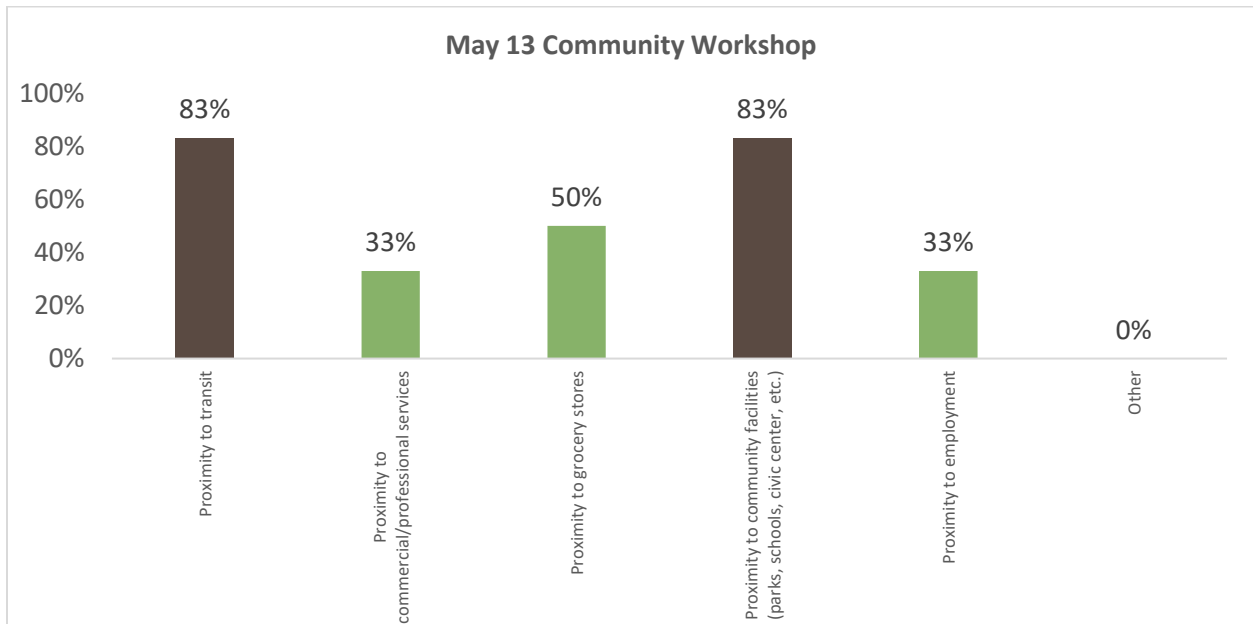
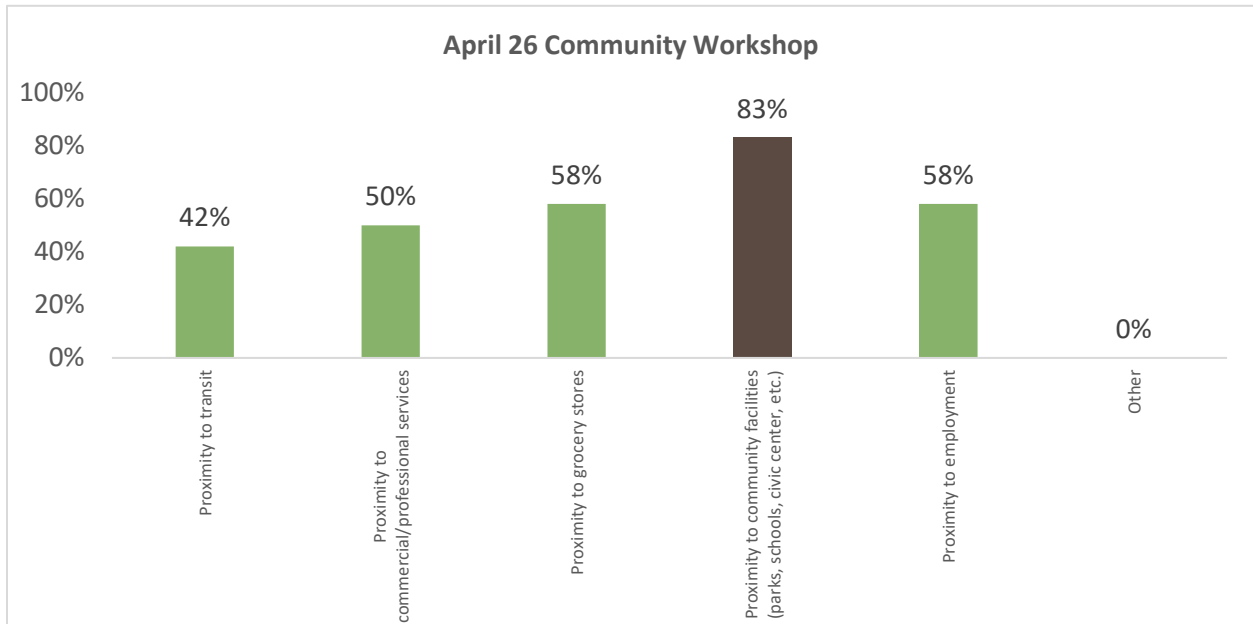
Please provide your top three (3) programs to improve housing access in Redlands (multiple choice).



8.1.3.1.1.1.2 Other: Updating the City ordinances to be more in-line with what is currently going on. Provide assistance to purchase homes



What are your top three (3) most important criteria for selecting land for housing (multiple choice)?



8.1.3.2 April 26 Q & A Box

Is there anything that we can do to extend public transportation to the East end of the city / Mentone?

- As noted, transit services currently end at the University of Redlands. However, proximity to employment is very important, as transit follows routes to reach the most riders. With development surrounding the potential Arrow Rail stations, potential ridership may increase in a way that would make transit to Mentone more likely. Omnitrans is in charge of transit within the County of San Bernardino, and participants are suggested to direct questions or suggestions for new services to them. The City will forward this comment to Omnitrans.

How many of the transit stops provide 15-minute or better service frequencies?

- The City does not have that information at present. The majority of stops within the half mile buffer have a 20-minute leeway. A few meet the 15-minute leeway. Commenters are directed to Omnitrans for specific service information.

Although accessibility has not been ranked as a high concern, what is the impact to having ADA accessibility as a requirement? It seems like building in accessibility is less expensive than retro. It could be a selling point for developers since accessibility allows access to small children, wounded vets, and the elderly.

- Agreed, increased accessibility increases access for seniors and children. Building retrofits are done so with accessibility in mind. It is worth looking at programs to increase accessibility in the Transit Village Specific Plan Area. At present a 3-story residential building is the tallest type of building that does not require an elevator within Redlands. To encourage further accessibility, there could be a City program to increase elevator access in 3 story buildings that already exist or may potentially exist in the future.

Are there any community centers or senior centers planned for the East end of the city? There is much housing developed there but it appears most services are still concentrated near the commercial sector.

- The City is not aware of new facilities for seniors in the east side of the City. The City can share that comment.

How is the homeless population distributed across cities in Southern California? Does a government agency assign them to cities, or they move to the area they like?

- Homeless populations are not governed by anybody. They self-select where they would like to be, but generally congregate near areas of transit, services, or areas they are familiar with. There are no governmental controls regarding homeless populations.

Will denser development increase local transit frequency?

- Ideally, the two go together. Greater densities allow for greater ridership, which allows for greater transit frequency. The two are complimentary factors, but one does not necessarily cause the other. The City is looking to marry those two as best they can.

Since business provides more revenue than city expense and residential is opposite, is there planning to balance residential with commercial? This would limit need for transit, too.

- Commercial uses do not necessarily increase revenue. Residential uses require more in infrastructure than in terms of revenue, but they should not all be lumped into one category. In some cases, single family residential development has higher maintenance costs due to larger amount of utilities required for each unit. Multifamily development, like commercial, tends to pay for itself.

Has the City looked at what resources Omnitrans would need to increase transit service frequencies and extend service to the eastern end?

- It is part of the City's regular process to route proposed developments to Omnitrans for comment and how the project would/could integrate into the Omnitrans network. There is coordination between agencies.

Are the proposed high density / ~~low-income~~low-income housing areas close to similar income employment opportunities?

- Any proposed developments that would meet HCD standards for ~~low-income~~low-income housing are generally located near employment opportunities, as seen on the web-map. Most low-income areas are located in the East Valley Corridor and is well covered by existing services.

Will the Redlands mall get the Measure U exemption? Is MBI helping with that?

- The Redlands Mall will be discussed at Tuesday's Planning Commission meeting, and MBI will not be involved with that project.

Just a comment responding to an earlier question. There is a Library & Senior Center in Mentone (operated by the County) that can serve Redlands residents on the east side of town.

- The Library and Senior Center of Mentone will be added to the web-map.

8.1.3.3 May 13 Q & A Box

It's disappointing that there is no average income housing planned for within the transit villages specific plan

- Dan Wery noted that HCD utilizes density as a proxy for income levels. For instance, 30 dwelling units to the acre would be suitable for low-income housing, while 12 units to the acre would be suitable for moderate income housing. Thus, the housing planning within the Transit Villages Specific Plan would be planned for (as the City merely has to plan for, not construct, housing) 30 dwelling units to the acre in order to accommodate housing at all income levels within this part of the City.

8.1.3.4 GENERAL THEMES

A few common themes emerged from comments received at both public outreach meetings, including the following:

Affordability is a priority. Several participants questioned if more affordable housing will be constructed in the City in the near future, and how these affordable units will be distributed across the City.

To address the issue of affordability, the City will undertake Program 1.1-3 to amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower-income household on sites previously identified in the past two Housing Element cycles, and Program 1.2-4, a Single Room Occupancy Ordinance to provide additional housing opportunities for low and very-low income households near the planned Metrolink Stations. The City will also undertake several programs to assist with the construction of affordable Accessory Dwelling Unit construction, and will also undertake Program 7.3-2, which calls upon the

City to Study and consider the adoption of an inclusionary housing ordinance. Additionally, Program 1.5-9 calls upon the City to continue to implement the Mobile Home Rent Control ordinance to prevent displacement of lower-income and at risk populations.

Homelessness and assistance for those near homelessness is also a concern. There is a need for permanent supportive housing and temporary housing for those suffering from homelessness and for those with disabilities. Also mentioned was a synergistic need for increased social services in tandem with housing solutions.

To address this issue, this Housing Element contains Program 1.2-1 to address emergency shelters, Program 1.2-2 to provide opportunities for Low Barrier Navigation Centers in the City, and Program 1.2-3 to address supportive housing. Program 1.2-4 will establish a Single Room Occupancy Ordinance to provide additional housing opportunities for low and very-low income households near the planned Metrolink Stations. Program 1.2-5 has been included to implement mitigating strategies to remove potential constraints on the production of large group homes. Additionally, Program 1.3-7 would administer County funds to service providers including local non-profits in coordination with City Police Department Homelessness Liaison.

There is community opposition to high density housing in the City. This presents a large constraint, as there are preconceived notions regarding affordable housing and those who would occupy affordable units. The general attitude of the community is one of the most frequently mentioned constraints by stakeholders.

Program 1.5-4 has been included in this Housing Element, calling upon the City to Continue to implement the Mobile Home Rent Control ordinance to prevent displacement of lower-income and at-risk populations. The City will implement program 1.6-1, through which the City will promote incentives and tools available to facilitate ADU construction. Provide easily accessible information on the City's website, at the zoning counter. Coordinate with SBCTA to utilize regional resources and adopt policies, procedures, and standards consistent with neighboring jurisdictions to streamline ADU applications. Additionally, Program 7.5-3 calls upon the City to publicize Fair Housing Information, including information about tenants' rights, landlord requirements, and recent litigation on the City's website, social media platforms, and through physical promotional material (e.g. flyers, posters) to inform the community about Affirmatively Furthering Fair Housing.

There was repeated concern regarding the siting of new housing units, especially in conjunction with the Transit Villages Specific Plan and existing transit options. At present, most transit services terminate in Redlands given its position in the Inland Empire. Most stakeholders expressed a desire for new units to be well-connected to existing services and established transportation routes.

Programs 1.1-2 and 1.5-8 has been included in this Housing Element to provide additional capacity for residential development in the City's highest opportunity areas through the Transit Villages Specific Plan (TVSP). Adoption the TVSP by the end of 2022 aims to allow for greater residential development around the three new light rail stations. The City will use the TVSP to facilitate smart-growth planning principles, downtown revitalization, and infill development. Additionally, Programs 1.2-12 and 1.2-13 will amend the zoning ordinance for C-3, C-4, and A-P zones to clarify mixed-use requirements, clarify the requirements and allowances for mixed-use and residential development in these zones, create objective standards for mixed-uses, and, as appropriate, change the zoning standards to encourage commercial recycling and residential development in these zones.

Concerns were raised for the ability of young families to afford to live in Redlands, with mentions of the need to build equity in the community, either through tiny homes or accessory dwelling units.

Programs 1.6-1, 1.6-2, 1.6-3, and 1.6-4 have been included in this Housing Element to more easily provide alternative housing typologies such as accessory dwelling units (ADUs) that have the potential for housing families. Program 7.1-1 incorporates the City's requisite rezoning to accommodate 1,898 very low and low income units, 782 moderate income units, and 1,538 above moderate income units, units that could potentially be utilized as starter homes for young families seeking to build equity. Additionally, Program 1.2-7 calls upon the City to amend parking requirements, open-space standards, and setbacks for multi-family properties to further incentivize and encourage higher density development.

Participants have stated that land use restrictions, including those implemented through Measure U, are a hinderance for further housing developments, especially affordable housing developments. Additional constraints mentioned by the public included permitting difficulties and construction costs.

Programs 1.2-14 and 1.2-15 have been included to reduce permitting requirements for new housing in the City, such as removing the CUP requirement for buildings taller than 35 feet, and waiving pre-application meeting fees and providing technical assistance to projects that propose to provide below market-rate units. Program 1.2-16 aims to provide information and maps of known environmental constraints at the zoning counter to provide additional clarity and certainty and mitigate non-governmental constraints for project applicants. Additionally, Program 1.6-2 makes a variety of example ADU plan sets available to facilitate reduced applicant cost and expedited review for ADUs. Ensure example plans provide choices and diversity in size to accommodate a variety of household sizes and types.

8.1.3.5 Policies

To address affordability, Program 1.1-2 would allow for by-right approval of projects with 20 percent affordable units on a "reused" Housing Element site. Additionally, Programs 1.6-1, -2, -3 and -4, will allow for the development of ADUs, including affordable ADUs.

To address homelessness, the City is adopting Programs 1.2-1, -2, -3, -4, and -5. These programs are meant to facilitate the development of emergency shelters, low barrier navigation centers, transitional housing, supportive housing, single-room occupancy units, and group homes in order to provide for a variety of housing typologies to shelter at-risk populations. Programs 1.3-7 and -8 are added specifically to administer CDBG funds to service providers including local non-profits, and to continue assisting in connecting homeless individuals to local service providers, as well as continue funding shelter beds with available grant funding and donations.

To address Measure U and community opposition, Program 1.1-1 will allow for the necessary rezonings to allow for new housing developments that could be permitted without discretionary action. Program 1.1-2 will allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. Program 1.2-13 will remove the current CUP requirement for buildings over 35 feet. These programs will provide the necessary land use and zoning framework for the City to develop a variety of housing types at densities that can support moderate and lower-income units, which could be permitted on a regular basis without the need for a General Plan Amendments, CUPs, or other politically sensitive actions.

Additionally, Program 1.1-2 would allow for by-right approval of projects with 20 percent affordable units on a “reused” Housing Element site.

To address the siting of new housing units, Program 1.1-1 will allow for the necessary rezonings to allow for new housing developments that could be permitted without discretionary action. Program 1.1-2 will allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. These programs will focus future housing development in the City closer to existing transit options, such as bus and rail, as well as exiting job centers, such as Downtown Redlands, the University of Redlands, and the Esri campus.

To address the building of equity, Program 1.3-2 is added to study the viability of an inclusionary housing ordinance. Program 1.4-1 is added to preserve at-risk publicly housing units, while Program 1.5-9 will continue to implement to Mobile Home Rent Control ordinance to prevent displacement of lower-income and at risk populations, continuing to allow these populations to build equity.

To address land use restrictions, [such as Measure U](#), Program 1.1-1 will allow for the necessary rezonings to allow for new housing developments that could be permitted without discretionary action. Program 1.1-2 will allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. Program 1.1-5 would require minimum densities to ensure residential projects are developed close to their maximum densities.

Appendix D: Zoning Code Abbreviations

| <u>Zoning Code</u> | <u>Zoning Designation</u> |
|--------------------|---|
| <u>A-1</u> | <u>Agricultural</u> |
| <u>A-1-20</u> | <u>Agricultural</u> |
| <u>A-2</u> | <u>Estate Agricultural</u> |
| <u>R-R</u> | <u>Rural Residential</u> |
| <u>R-R-A</u> | <u>Rural Residential Animals</u> |
| <u>R-A</u> | <u>Residential Estate</u> |
| <u>R-A-A</u> | <u>Residential Estate Animals</u> |
| <u>R-E</u> | <u>Residential Estate</u> |
| <u>R-S</u> | <u>Suburban Residential</u> |
| <u>R-1</u> | <u>Single-Family Residential</u> |
| <u>R-1-D</u> | <u>Single-Family Residential</u> |
| <u>R-2</u> | <u>Multiple-Family Residential</u> |
| <u>R-2-2000</u> | <u>Multiple-Family Residential</u> |
| <u>R-3</u> | <u>Multiple-Family Residential</u> |
| <u>A-P</u> | <u>Administrative & Professional Office</u> |
| <u>A-P-C</u> | <u>Administrative & Professional Commercial</u> |
| <u>M-F</u> | <u>Medical Facility</u> |
| <u>E</u> | <u>Educational</u> |
| <u>C-1</u> | <u>Neighborhood Stores</u> |
| <u>C-2</u> | <u>Neighborhood Convenience Center</u> |
| <u>C-3</u> | <u>General Commercial</u> |
| <u>C-4</u> | <u>Highway Commercial</u> |
| <u>C-M</u> | <u>Commercial Industrial</u> |
| <u>M-P</u> | <u>Planned Industrial</u> |
| <u>M-1</u> | <u>Light Industrial</u> |
| <u>I-P</u> | <u>Industrial</u> |
| <u>M-2</u> | <u>General Industrial</u> |
| <u>P</u> | <u>Off Street Parking</u> |
| <u>O</u> | <u>Open Land District</u> |
| <u>I</u> | <u>Transitional District</u> |
| <u>A-D</u> | <u>Airport District</u> |
| <u>HD</u> | <u>Hillside Development</u> |
| <u>C-D</u> | <u>Civic Design District</u> |
| <u>FP</u> | <u>Flood Plain District</u> |

|

**Please Start Here, Instructions in Cell
A2, Table in A3:B15**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

| General Information | |
|-----------------------|--|
| Jurisdiction Name | REDLANDS |
| Housing Element Cycle | 6th |
| Contact Information | |
| First Name | Catherine |
| Last Name | Lin |
| Title | Principal Planner |
| Email | clin@cityofredlands.org |
| Phone | |
| Mailing Address | |
| Street Address | <u>Suite 20</u> |
| City | Redlands |
| Zip Code | 92373 |

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

| Jurisdiction Name | Site Address/Intersection | 5 Digit ZIP Code | Assessor Parcel Number | Consolidated Sites | General Plan Designation (Current) | Zoning Designation (Current) | Minimum Density Allowed (units/acre) | Max Density Allowed (units/acre) | Parcel Size (Acres) | Existing Use/Vacancy | Infrastructure | Publicly-Owned | Site Status | Identified in Last/Last Two Planning Cycle(s) | Lower Income Capacity | Moderate Income Capacity | Above Moderate Income Capacity | Total Capacity | Optional Information1 | Optional Information2 | Optional Information3 |
|-------------------|---------------------------|------------------|------------------------|--------------------|------------------------------------|------------------------------|--------------------------------------|----------------------------------|---------------------|----------------------|----------------|----------------------|-------------|---|-----------------------|--------------------------|--------------------------------|----------------|-----------------------|-----------------------|-----------------------|
| REDLANDS | 1624 Webster St | 92374 | 016712105 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.146 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | 1 | 1 | | | |
| REDLANDS | 908 Elise Dr | 92374 | 016714105 | | COMMERCIAL | CP-4 | 0 | 30 | 4.997 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 120 | | | 120 | | | |
| REDLANDS | 1565 Texas St | 92374 | 016714106 | | COMMERCIAL | CP-4 | 0 | 30 | 6.306 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 151 | | | 151 | | | |
| REDLANDS | 1505 Orange St | 92374 | 016715123 | | HIGH DENSITY RESIDR-2 | | 0 | 27 | 0.328 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 7 | | 7 | | | |
| REDLANDS | 1502 Orange St | 92374 | 016716110 | | HIGH DENSITY RESIDR-2 | | 0 | 27 | 3.958 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 85 | | | 85 | | | |
| REDLANDS | 1402 Karon St | 92374 | 016717104 | | COMMERCIAL | EV/SD | 0 | 15 | 9.698 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 116 | | 116 | | | |
| REDLANDS | 1312 Texas St | 92374 | 016718102 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.523 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | 3 | 3 | | | |
| REDLANDS | 709 W Lugonia Ave | 92374 | 016723105 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.620 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | 3 | 3 | | | |
| REDLANDS | 606 W Western Ave | 92374 | 016723226 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.134 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1244 Columbia St | 92374 | 016723312 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.154 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1257 Herald St | 92374 | 016725313 | | LOW DENSITY RESIDR-2 | | 0 | 6 | 0.132 | Vacant | YES - Current | YES - City-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1239 Herald St | 92374 | 016725316 | | LOW DENSITY RESIDR-2 | | 0 | 6 | 0.152 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1227 Herald St | 92374 | 016725319 | | LOW DENSITY RESIDR-2 | | 0 | 6 | 0.152 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 740 W Brockton Ave | 92374 | 016728101 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.431 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 2 | 2 | | |
| REDLANDS | 1111 Calhoun St | 92374 | 016728219 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.205 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1111 Calhoun St | 92374 | 016728220 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.171 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 620 W Brookton Ave | 92374 | 016728221 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.172 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1143 Ohio St | 92374 | 016729110 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.166 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1537 Carmel Ct | 92374 | 016813104 | | VERY LOW DENSITY RR-E | | 0 | 2.7 | 0.692 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 1721 E Colton Ave | 92374 | 016829102 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 9.007 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 43 | 43 | | |
| REDLANDS | 1421 Hunter Dr | 92374 | 12126129 | | MEDIUM DENSITY RESR-2 | | 0 | 15 | 4.335 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 52 | | 52 | | | |
| REDLANDS | 912 Elise Dr | 92374 | 016714104 | | COMMERCIAL | CP-4 | 0 | 15 | 14.048 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 169 | | | |
| REDLANDS | 1016 Texas St | 92374 | 016903104 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.136 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 516 N Eureka St | 92374 | 016903112 | | COMMERCIAL | SP45/TC | 0 | 30 | 0.142 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 910 Lawton St | 92374 | 016903501 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.139 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 302 W Colton Ave | 92374 | 016905311 | | COMMERCIAL | C-4 | 0 | 30 | 0.198 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 3 | | 3 | | | |
| REDLANDS | 102 W Colton Ave | 92374 | 016906310 | | COMMERCIAL | C-4 | 0 | 30 | 0.135 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 2 | | 2 | | | |
| REDLANDS | 924 Washington St | 92374 | 016906506 | | LOW DENSITY RESIDR-1 | | 0 | 6 | 0.137 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 831 N 6th St | 92374 | 016907606 | | LOW DENSITY RESIDR-2 | | 0 | 6 | 0.141 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 831 N 6th St | 92374 | 016907607 | | LOW DENSITY RESIDR-2 | | 0 | 6 | 0.149 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 910 Tribune St | 92374 | 016910613 | | LOW DENSITY RESIDR-2 | | 0 | 6 | 0.124 | Vacant | YES - Current | NO - Privately-Owned | Available | | | | | 1 | 1 | | |
| REDLANDS | 663 New York St | 92374 | 016911123 | | COMMERCIAL/INDUST-C-M | | 0 | 30 | 0.998 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 15 | | | 15 | | | |
| REDLANDS | 1120 W Redlands Blvd | 92374 | 016911124 | | COMMERCIAL/INDUST-C-M | | 0 | 30 | 0.999 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 15 | | | 15 | | | |
| REDLANDS | 604 Ruiz St | 92374 | 016915301 B | | COMMERCIAL | SP45/TC | 0 | 30 | 0.168 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 3 | | | 3 | | | |
| REDLANDS | 608 Ruiz St | 92374 | 016915302 B | | COMMERCIAL | SP45/TC | 0 | 30 | 0.160 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 2 | | | 2 | | | |
| REDLANDS | 612 Ruiz St | 92374 | 016915303 B | | COMMERCIAL | SP45/TC | 0 | 30 | 0.160 | Parking Lot | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 2 | | | 2 | | | |
| REDLANDS | 612 Ruiz St | 92374 | 016915314 B | | COMMERCIAL | SP45/TC | 0 | 30 | 0.123 | Parking Lot | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 2 | | | 2 | | | |
| REDLANDS | 516 Ruiz St | 92374 | 016915611 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.170 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 2 | | | 2 | | | |
| REDLANDS | 512 Ruiz St | 92374 | 016915612 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.162 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 1 | | | 1 | | | |
| REDLANDS | 512 Ruiz St | 92374 | 016915613 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.271 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 4 | | | 4 | | | |
| REDLANDS | 250 W Stuart Ave | 92374 | 016915614 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.351 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 5 | | | 5 | | | |
| REDLANDS | 511 Ruiz St | 92374 | 016915615 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.272 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 4 | | | 4 | | | |
| REDLANDS | 320 Stuart Ave | 92374 | 016915616 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.127 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 320 Stuart Ave | 92374 | 016915617 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.124 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 320 Stuart Ave | 92374 | 016915618 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.022 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 1 | | | 1 | | | |
| REDLANDS | 508 N Eureka St | 92374 | 016915619 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.290 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 4 | | | 4 | | | |
| REDLANDS | 516 N Eureka St | 92374 | 016915620 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.124 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 523 Ruiz St | 92374 | 016915629 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.156 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 2 | | | 2 | | | |
| REDLANDS | 519 Ruiz St | 92374 | 016915630 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.156 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 1 | | | 1 | | | |
| REDLANDS | 515 Ruiz St | 92374 | 016915631 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.156 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 1 | | | 1 | | | |
| REDLANDS | 511 Ruiz St | 92374 | 016915632 D | | COMMERCIAL | SP45/TC | 0 | 30 | 0.164 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 1 | | | 1 | | | |
| REDLANDS | 107 W Colton Ave | 92374 | 016920203 | | COMMERCIAL | C-4 | 0 | 30 | 0.148 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 2 | | 2 | | | |
| REDLANDS | 35 W Colton Ave | 92374 | 016920205 | | COMMERCIAL | C-4 | 0 | 30 | 0.123 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 2 | | 2 | | | |
| REDLANDS | 619 New York St | 92374 | 016925101 | | COMMERCIAL/INDUST-C-M | | 0 | 30 | 3.817 | Single Family Res | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 56 | | | 56 | | | |
| REDLANDS | 430 Texas St | 92374 | 016927102 | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.148 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 2 | | 2 | | | |
| REDLANDS | 715 W Stuart Ave | 92374 | 016927103 | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.152 | Vacant | YES - Current | NO - Privately-Owned | Available | | | 2 | | 2 | | | |
| REDLANDS | 701 Stuart Ave | 92374 | 016927107 C | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.160 | Vacant | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 2 | | | 2 | | | |
| REDLANDS | 619 Stuart Ave | 92374 | 016927109 C | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.176 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 3 | | | 3 | | | |
| REDLANDS | 615 Stuart Ave | 92374 | 016927110 C | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.176 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 3 | | | 3 | | | |
| REDLANDS | 611 W Stuart | 92374 | 016927111 C | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.176 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 3 | | | 3 | | | |
| REDLANDS | 611 W Stuart | 92374 | 016927112 C | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.176 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 3 | | | 3 | | | |
| REDLANDS | 607 Stuart Ave | 92374 | 016927113 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.165 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 545 Stuart Ave | 92374 | 016927115 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.110 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 545 Stuart Ave | 92374 | 016927116 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.110 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 545 Stuart Ave | 92374 | 016927117 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.183 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 3 | | | 3 | | | |
| REDLANDS | 535 W Stuart Ave | 92374 | 016927118 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.108 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 2 | | | 2 | | | |
| REDLANDS | 535 W Stuart Ave | 92374 | 016927119 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.090 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 1 | | | 1 | | | |
| REDLANDS | 535 W Stuart Ave | 92374 | 016927120 C | | COMMERCIAL | SP45/TC | 0 | 30 | 0.158 | Commercial and | YES - Current | NO - Privately-Owned | Available | Used in Prior Housing Element - Non-Vacant | 2 | | | 2 | | | |
| REDLANDS | 701 Stuart Ave | 92374 | 016927153 C | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 0.175 | Vacant | YES - Current | NO - Privately-Owned | Available | Used in Two Consecutive Prior Housing Elements - Vacant | 3 | | | 3 | | | |
| REDLANDS | 420 W Redlands Blvd | 92374 | 016927229 D | | COMMERCIAL/INDUST/TC | | 0 | 30 | 1.569 | Parking Lot | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 24 | | | 24 | | | |
| REDLANDS | 120 W Redlands Blvd | 92374 | 016928130 | | COMMERCIAL | SP45/TCH | 0 | 30 | 1.479 | Commercial and | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 22 | | | 22 | | | |
| REDLANDS | 110 W Redlands Blvd | 92374 | 016928154 | | COMMERCIAL | SP45/TCH | 0 | 30 | 0.868 | Commercial and | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 13 | | | 13 | | | |
| REDLANDS | 4 W Redlands Blvd | 92374 | 016928155 | | COMMERCIAL | SP45/TCH | 0 | 30 | 1.006 | Commercial and | YES - Current | NO - Privately-Owned | Available | Not Used in Prior Housing Element | 15 | | | 15 | | | |
| REDLANDS | 301 9th St | 92374 | 016931317 | | COMMERCIAL/INDUST/SP45/SC | | 0 | 30 | 2.157 | Vacant | YES | | | | | | | | | | |

[illegible]

[illegible]

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

| Jurisdiction Name | Site Address/Intersection | 5 Digit ZIP Code | Assessor Parcel Number | Very Low-Income | Low-Income | Moderate-Income | Above Moderate-Income | Type of Shortfall | Parcel Size (Acres) | Current General Plan Designation | Current Zoning | Proposed General Plan (GP) Designation | Proposed Zoning | Minimum Density Allowed | Maximum Density Allowed | Total Capacity | Vacant/ Nonvacant | Description of Existing Uses | Optional Information1 | Optional Information2 | Optional Information3 |
|-------------------|---------------------------|------------------|------------------------|-----------------|------------|-----------------|-----------------------|--------------------|---------------------|----------------------------------|----------------|--|-----------------|-------------------------|-------------------------|----------------|-------------------|--|-----------------------|-----------------------|-----------------------|
| REDLANDS | 908 Elise Dr | 92374 | 16714105 | | 120 | | | Shortfall of Sites | 5.00 | COMMERCIAL | CP-4 | HIGH DENSITY RESIDENTIAL | R-3 | 20 | 30 | 120 | Vacant | Vacant | | | |
| REDLANDS | 1555 Texas St | 92374 | 16714106 | | 151 | | | Shortfall of Sites | 6.31 | COMMERCIAL | CP-4 | HIGH DENSITY RESIDENTIAL | R-3 | 20 | 30 | 151 | Vacant | Vacant | | | |
| REDLANDS | 1505 Orange St | 92374 | 16717104 | | | 116 | | Shortfall of Sites | 9.70 | COMMERCIAL | EV/SD | MEDIUM DENSITY RESIDENTIAL | R-2 | 0 | 15 | 116 | Vacant | Vacant | | | |
| REDLANDS | 1502 Orange St | 92374 | 16714104 | | | 169 | | Shortfall of Sites | 14.05 | COMMERCIAL | CP-4 | MEDIUM DENSITY RESIDENTIAL | R-2 | 0 | 15 | 169 | Vacant | Vacant | | | |
| REDLANDS | 1402 Karon St | 92374 | 16911123 | | 15 | | | Shortfall of Sites | 1.00 | COMMERCIAL | C-M | TVSP | TVSP | 20 | 30 | 15 | Vacant | Vacant | | | |
| REDLANDS | 1312 Texas St | 92374 | 16911124 | | 15 | | | Shortfall of Sites | 1.00 | COMMERCIAL | C-M | TVSP | TVSP | 20 | 30 | 15 | Vacant | Vacant | | | |
| REDLANDS | 709 W Lugonia Ave | 92374 | 16915301 | | 3 | | | Shortfall of Sites | 0.17 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 606 W Western Ave | 92374 | 16915302 | | 2 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 1244 Columbia St | 92374 | 16915611 | | 2 | | | Shortfall of Sites | 0.17 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 1257 Herald St | 92374 | 16915612 | | 1 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 1239 Herald St | 92374 | 16915613 | | 4 | | | Shortfall of Sites | 0.27 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 4 | Vacant | Vacant | | | |
| REDLANDS | 1227 Herald St | 92374 | 16915614 | | 5 | | | Shortfall of Sites | 0.35 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 5 | Vacant | Vacant | | | |
| REDLANDS | 740 W Brockton Ave | 92374 | 16915615 | | 4 | | | Shortfall of Sites | 0.27 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 4 | Vacant | Vacant | | | |
| REDLANDS | 1111 Calhoun St | 92374 | 16915616 | | 2 | | | Shortfall of Sites | 0.13 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 1111 Calhoun St | 92374 | 16915617 | | 2 | | | Shortfall of Sites | 0.12 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 620 W Brockton Ave | 92374 | 16915618 | | 1 | | | Shortfall of Sites | 0.02 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 1143 Ohio St | 92374 | 16915619 | | 4 | | | Shortfall of Sites | 0.29 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 4 | Vacant | Vacant | | | |
| REDLANDS | 1537 Carmel Ct | 92374 | 16915620 | | 2 | | | Shortfall of Sites | 0.12 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 1721 E Colton Ave | 92374 | 16915630 | | 1 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 1421 Hunter Dr | 92374 | 16915631 | | 1 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 912 Elise Dr | 92374 | 16915632 | | 1 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 1016 Texas St | 92374 | 16925101 | | 56 | | | Shortfall of Sites | 3.82 | COMMERCIAL | C-M | TVSP | TVSP | 20 | 30 | 56 | Non-Vacant | Single Family Residential | | | |
| REDLANDS | 929 Lawton St | 92374 | 16927102 | | | 2 | | Shortfall of Sites | 0.15 | COMMERCIAL | SP45/SC | TVSP | TVSP | 0 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 910 Lawton St | 92374 | 16927103 | | | 2 | | Shortfall of Sites | 0.15 | COMMERCIAL | SP45/SC | TVSP | TVSP | 0 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 302 W Colton Ave | 92374 | 16927107 | | 2 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/SC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 102 W Colton Ave | 92374 | 16927109 | | 3 | | | Shortfall of Sites | 0.18 | COMMERCIAL | SP45/SC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 924 Washington St | 92374 | 16927110 | | 3 | | | Shortfall of Sites | 0.18 | COMMERCIAL | SP45/SC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 831 N 6th St | 92374 | 16927111 | | 3 | | | Shortfall of Sites | 0.18 | COMMERCIAL | SP45/SC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 831 N 6th St | 92374 | 16927112 | | 3 | | | Shortfall of Sites | 0.18 | COMMERCIAL | SP45/SC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 910 Tribune St | 92374 | 16927113 | | 2 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 663 New York St | 92374 | 16927115 | | 2 | | | Shortfall of Sites | 0.11 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 1120 W Redlands Blvd | 92374 | 16927116 | | 2 | | | Shortfall of Sites | 0.11 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 604 Ruiz St | 92374 | 16927117 | | 3 | | | Shortfall of Sites | 0.18 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 608 Ruiz St | 92374 | 16927118 | | 2 | | | Shortfall of Sites | 0.11 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 612 Ruiz St | 92374 | 16927119 | | 1 | | | Shortfall of Sites | 0.09 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 612 Ruiz St | 92374 | 16927120 | | 2 | | | Shortfall of Sites | 0.16 | COMMERCIAL | SP45/TC | TVSP | TVSP | 20 | 30 | 2 | Non-Vacant | Storage | | | |
| REDLANDS | 616 Ruiz St | 92374 | 16927121 | | 3 | | | Shortfall of Sites | 0.18 | COMMERCIAL | SP45/SC | TVSP | TVSP | 20 | 30 | 3 | Vacant | Vacant | | | |
| REDLANDS | 512 Ruiz St | 92374 | 16927229 | | 24 | | | Shortfall of Sites | 1.57 | COMMERCIAL | M-1 | TVSP | TVSP | 0 | 30 | 24 | Non-Vacant | Parking Lot | | | |
| REDLANDS | 512 Ruiz St | 92374 | 16928130 | | 22 | | | Shortfall of Sites | 1.48 | COMMERCIAL | SP45/TCH | TVSP | TVSP | 20 | 30 | 22 | Non-Vacant | Retail Strip | | | |
| REDLANDS | 250 W Stuart St | 92374 | 16928154 | | 13 | | | Shortfall of Sites | 0.87 | COMMERCIAL | SP45/TCH | TVSP | TVSP | 20 | 30 | 13 | Non-Vacant | Restaurant | | | |
| REDLANDS | 511 Ruiz St | 92374 | 16928155 | | 15 | | | Shortfall of Sites | 1.01 | COMMERCIAL | SP45/TCH | TVSP | TVSP | 20 | 30 | 15 | Non-Vacant | Bank/Savings & Loan | | | |
| REDLANDS | 320 Stuart Ave | 92374 | 16931317 | | 52 | | | Shortfall of Sites | 2.16 | COMMERCIAL/INDUSTRIAL | SP45/SC | HIGH DENSITY RESIDENTIAL | R-3 | | 30 | 52 | Vacant | Vacant | | | |
| REDLANDS | 320 Stuart Ave | 92374 | 16937106 | | 17 | | | Shortfall of Sites | 1.16 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 17 | Non-Vacant | Bank/Savings & Loan | | | |
| REDLANDS | 320 Stuart Ave | 92374 | 16937110 | | 1 | | | Shortfall of Sites | 0.05 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 1 | Non-Vacant | Bank/Savings & Loan | | | |
| REDLANDS | 508 N Eureka St | 92374 | 16937112 | | 2 | | | Shortfall of Sites | 0.15 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 2 | Non-Vacant | Parking Lot | | | |
| REDLANDS | 516 N Eureka St | 92374 | 16937117 | | 1 | | | Shortfall of Sites | 0.06 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 1 | Non-Vacant | Bank/Savings & Loan | | | |
| REDLANDS | 523 Ruiz St | 92374 | 16937118 | | 1 | | | Shortfall of Sites | 0.10 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 1 | Non-Vacant | Parking Lot | | | |
| REDLANDS | 519 Ruiz St | 92374 | 16937121 | | 1 | | | Shortfall of Sites | 0.08 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 1 | Non-Vacant | Bank/Savings & Loan | | | |
| REDLANDS | 515 Ruiz St | 92374 | 16937122 | | 6 | | | Shortfall of Sites | 0.42 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 6 | Non-Vacant | Bank/Savings & Loan | | | |
| REDLANDS | 511 Ruiz St | 92374 | 16938105 | | 104 | | | Shortfall of Sites | 6.96 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 104 | Non-Vacant | Retail | | | |
| REDLANDS | 107 W Colton Ave | 92374 | 16938108 | | 16 | | | Shortfall of Sites | 1.07 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 16 | Non-Vacant | Retail | | | |
| REDLANDS | 35 W Colton Ave | 92374 | 16938110 | | 35 | | | Shortfall of Sites | 2.35 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 35 | Non-Vacant | Retail | | | |
| REDLANDS | 619 New York St | 92374 | 16938111 | | 14 | | | Shortfall of Sites | 0.91 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 14 | Non-Vacant | Retail | | | |
| REDLANDS | 430 Texas St | 92374 | 16938113 | | 69 | | | Shortfall of Sites | 4.57 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 69 | Non-Vacant | Retail | | | |
| REDLANDS | 715 W Stuart Ave | 92374 | 16938114 | | 28 | | | Shortfall of Sites | 1.89 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 28 | Non-Vacant | Restaurant | | | |
| REDLANDS | 701 Stuart Ave | 92374 | 16940113 | | 10 | | | Shortfall of Sites | 0.69 | COMMERCIAL | EV/CG | TVSP | TVSP | 20 | 30 | 10 | Non-Vacant | Restaurant | | | |
| REDLANDS | 619 Stuart Ave | 92374 | 17012111 | | 14 | | | Shortfall of Sites | 1.00 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 14 | Non-Vacant | Single Family Residential | | | |
| REDLANDS | 615 Stuart Ave | 92374 | 17012112 | | 12 | | | Shortfall of Sites | 0.90 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 12 | Non-Vacant | Single Family Residential | | | |
| REDLANDS | 611 W Stuart | 92374 | 17012113 | | 8 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 8 | Non-Vacant | Single Family Residential | | | |
| REDLANDS | 611 W Stuart | 92374 | 17012114 | | 7 | | | Shortfall of Sites | 0.49 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 7 | Vacant | Vacant | | | |
| REDLANDS | 607 Stuart Ave | 92374 | 17012115 | | 3 | | | Shortfall of Sites | 0.25 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 3 | Non-Vacant | Single Family Residential | | | |
| REDLANDS | 545 Stuart Ave | 92374 | 17017101 | | 47 | | | Shortfall of Sites | 3.13 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 47 | Vacant | Vacant | | | |
| REDLANDS | 545 Stuart Ave | 92374 | 17020101 | | 4 | | | Shortfall of Sites | 0.29 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 4 | Vacant | Vacant | | | |
| REDLANDS | 545 Stuart Ave | 92374 | 17020102 | | 1 | | | Shortfall of Sites | 0.09 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 1 | Vacant | Vacant | | | |
| REDLANDS | 535 W Stuart Ave | 92374 | 17020107 | | 7 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 7 | Non-Vacant | Duplex | | | |
| REDLANDS | 535 W Stuart Ave | 92374 | 17020108 | | 7 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 7 | Non-Vacant | Single Family Residential - Two Houses | | | |
| REDLANDS | 535 W Stuart Ave | 92374 | 17020109 | | 7 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 7 | Vacant | Vacant | | | |
| REDLANDS | 701 Stuart Ave | 92374 | 17020112 | | 9 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 9 | Vacant | Vacant | | | |
| REDLANDS | 420 W Redlands Blvd | 92374 | 17020121 | | 9 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 9 | Vacant | Vacant | | | |
| REDLANDS | 120 W Redlands Blvd | 92374 | 17020124 | | 9 | | | Shortfall of Sites | 0.57 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 9 | Vacant | Vacant | | | |
| REDLANDS | 110 W Redlands Blvd | 92374 | 17020130 | | 11 | | | Shortfall of Sites | 0.80 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 11 | Non-Vacant | Single Family Residential | | | |
| REDLANDS | 4 W Redlands Blvd | 92374 | 17020133 | | 6 | | | Shortfall of Sites | 0.41 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 6 | Vacant | Vacant | | | |
| REDLANDS | 301 9th St | 92374 | 17020134 | | 4 | | | Shortfall of Sites | 0.29 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 4 | Vacant | Vacant | | | |
| REDLANDS | 1580 Industrial Park Ave | 92374 | 17020135 | | 2 | | | Shortfall of Sites | 0.14 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 2 | Vacant | Vacant | | | |
| REDLANDS | 1580 Industrial Park Ave | 92374 | 17020137 | | 5 | | | Shortfall of Sites | 0.43 | HIGH DENSITY RESIDENTIAL | R-2 | TVSP | TVSP | 20 | 30 | 5 | Vacant | Vacant | | | </ |

Table C: Land Use, Table Starts in A2

[illegible]

**Zoning Designation
(From Table A, Column G)**

[illegible]

[illegible]

**Zoning Designation
(From Table A, Column G)**

[illegible]

[illegible]

**Zoning Designation
(From Table A, Column G)**

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

General Land Uses Allowed

Agriculture zone with 10% lot coverage, 5-acre minimum lots; (<https://codelibrary.amlegal.com/c>)

Administrative and professional office district, uses permitted in R-3 zone and business and prof

Multiple general commercial uses (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redla>)

Highway commercial district, includes general commercial and other uses such as motels, drive-

Commercial Industrial district, includes various manufacturing and commercial operations, (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/commercial-industrial-district>)

Concept Plan 4, uses include general commercial, services, lodging, cultural and administrative

East Valley Corridor Specific Plan, general commercial district, commercial uses allowed (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/east-valley-corridor-specific-plan>)

East Valley Corridor Specific Plan, general commercial district, commercial uses allowed (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/east-valley-corridor-specific-plan>)

East Valley Corridor Specific Plan, commercial industrial district, a variety of wholesale, retail, ar

East Valley Corridor Specific Plan, multiple family residential, up to 10 units an acre (<https://www.cityofredlands.org/DocumentCenter/View/11111>)

Light industrial district, light industrial plant sand related activities (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/light-industrial-district>)

Single family residential, current 7,200 sq ft minimum lots (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/single-family-residential>)

Multiple family residential, includes single family, multi-family dwellings, and duplexes with a den

Residential estate district, single family zone with 20,000 sq ft minimum lot size (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/residential-estate-district>)

Residential estate district, single family zone with 14,00 sq ft minimum lot size (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/residential-estate-district>)

Residential suburban district, low density single family homes with a 10,000 sq ft minimum lot si

Downtown Specific Plan, Town Center District, various retail, lodging, and civic uses allowed (<https://codelibrary.amlegal.com/codes/redlandsca/latest/redlandsca/codes/downtown-specific-plan>)

Downtown Specific Plan, Town Center Historic District, various retail, lodging, and civic uses allc

Downtown Specific Plan, Service Commercial District, various retail, lodging, and civic uses allow

Transitional district, uses include those allowed in the residential district abutting, facing or backi

General Land Uses Allowed

[illegible]

General Land Uses Allowed

[illegible]

[illegible]

| General Land Uses Allowed | |
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essional offices (https://codelibrary.amlegal.com/codes/redlandscs/latest/redlands_ca/0-0-0-1)

-in stores, public scales and service stations (https://codelibrary.amlegal.com/codes/redlandscs/latest/redlands_ca/0-0-0-18081#JD_18.100.020)
(https://www.cityofredlands.org/sites/main/files/file-attachments/concept_plan_4.pdf?1639698)
(https://www.cityofredlands.org/sites/main/files/file-attachments/ev-cg_-_general_commercial.pdf?1594051666)
(https://www.cityofredlands.org/sites/main/files/file-attachments/ev-cg_-_general_commercial.pdf?1594051666)
and service uses (https://www.cityofredlands.org/sites/main/files/file-attachments/ev-ic_-_commercial.pdf?1594051666)
(https://www.cityofredlands.org/sites/main/files/file-attachments/ev-mf3000_-_multifamily_residential.pdf?1594051666)

ensity of 3,000 sq ft of lot area per dwelling unit (<https://codelibrary.amlegal.com/codes/redlands>)

ze (https://codelibrary.amlegal.com/codes/redlandscs/latest/redlands_ca/0-0-0-16412)
(https://www.cityofredlands.org/sites/main/files/file-attachments/sp45_-_use_list.pdf?1594051666)
owed (https://www.cityofredlands.org/sites/main/files/file-attachments/sp45_-_use_list.pdf?1594051666)
ved (https://www.cityofredlands.org/sites/main/files/file-attachments/sp45_-_use_list.pdf?1594051666)
ing up to the lots and off street parking facilities (<https://codelibrary.amlegal.com/codes/redlands>)

a/latest/redlands_ca/0-0-0-17957)

ercial_industrial.pdf?1582744964

ca/latest/redlands_ca/0-0-0-16651)

dsca/latest/redlands_ca/0-0-0-17220)

| # | Category |
|---|-------------------------------|
| 1 | A. <u>Review and Revision</u> |
| 2 | A. <u>Review and Revision</u> |
| 3 | A. <u>Review and Revision</u> |
| 4 | A. <u>Review and Revision</u> |
| 5 | A. <u>Review and Revision</u> |
| 6 | A. <u>Review and Revision</u> |
| 7 | A. <u>Review and Revision</u> |
| 8 | A. <u>Review and Revision</u> |

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| 9 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 10 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 11 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 12 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 13 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |

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| 14 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 15 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |

16

**B. Housing Needs, Resources
and Constraints (1: AFFH)**

17

**B. Housing Needs, Resources
and Constraints (1: AFFH)**

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| 18 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 19 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 20 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |

21

**B. Housing Needs, Resources
and Constraints (1: AFFH)**

22

**B. Housing Needs, Resources
and Constraints (1: AFFH)**

23

**B. Housing Needs, Resources
and Constraints (1: AFFH)**

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| 24 | <u>B. Housing Needs, Resources and Constraints (1: AFFH)</u> |
| 25 | <u>B. Housing Needs, Resources and Constraints (2: ELI)</u> |

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| | |
| 26 | <u>B. Housing Needs, Resources and Constraints</u> (3: Housing Conditions) |
| 27 | <u>B. Housing Needs, Resources and Constraints</u> (4: Site Inventory) |

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| | <p><u>B. Housing Needs, Resources and Constraints (4: Site Inventory)</u></p> |
| | <p><u>B. Housing Needs, Resources and Constraints (4: Site Inventory)</u></p> |

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|----|---|
| 30 | <u>B. Housing Needs, Resources and Constraints (4: Site Inventory)</u> |
| 31 | <u>B. Housing Needs, Resources and Constraints (4: Site Inventory)</u> |
| 32 | <u>B. Housing Needs, Resources and Constraints (4: Site Inventory)</u> |

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Comment

The review of past programs should report progress in implementation and evaluate effectiveness of programs in achieving goals and objectives. Future programs should be revised to better achieve program goals. In many cases, programs were not implemented in the 5th cycle housing element, and others were done so after the dates stated in the programs.

The element should discuss

- 1) the lack of timely implementation and
- 2) what will be done differently in the 6th cycle housing element.
- 3) the effectiveness of programs (many programs need additional information and evaluation)

Program 7.2-11 (Assist with Foreclosure Prevention): Describe and evaluate how frequently the City updates the foreclosure prevention resources and how many homeowners were assisted by the program.

Program 7.4-12 (Threshold and Conditional Use Permit): Describe how the City evaluated the conditional use permit requirement and reached its conclusion that it has not been an impediment to multifamily development.

Program 7.5-4 (Senior and Handicapped Housing): Describe how many households were assisted under this use of CDBG funds.

Program 7.5-5 (CDBG Rental Rehabilitation): Describe how many households were assisted under this use of CDBG funds.

Program 7.6-1 (Buy-Out Assistance): Describe how the City implemented this program, what actions the City took, and how many units were assisted in the 5th cycle planning period.

Program 7.7-1 (Fair Housing Counseling): Describe how many households were assisted by fair housing counselling during the 5th cycle planning period.

As part of the review of programs in the past cycle, the element must provide an evaluation of the 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). For more information, See HCD's Building Blocks at <https://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml>.

Integration and Segregation: The element includes information on segregation and integration at the local level for race/ethnicity, disability, familial status, and income; however, the regional analyses for race/ethnicity and income need improvement, and some of the conclusions do not reflect the data.

Integration and Segregation: The data presented in the Affirmatively Furthering Fair Housing (AFFH) analyses and Housing Needs Assessment (Table 2.1-3 on p. 8) do not support the element's conclusions that the difference between the City and County's proportions of non-white Hispanic populations is similar.

Integration and Segregation: the local analysis of segregation by income should be clearer about the north to south patterns and trends.

Integration and Segregation: The City is significantly more affluent than the County (Table 2.4-1 p. 16), with 14 percent more of the population in the above-moderate income category compared to the County, yet this is not adequately analyzed or stated. The element should adequately analyze patterns and trends of segregation and integration, include a comparison of the City to the region, and consider other data options such as Census median income by block group. The element's summary of integration and segregation fair housing issues should be revised to reflect the data and analyses.

Racial/Ethnic Concentrated Areas of Poverty (R/ECAP) and Affluence (RCAA): The element notes there are no R/ECAPs in the City. However, the City does have an area of High Segregation and Poverty according to TCAC/HCD Opportunity maps and should include specific analysis. The analysis should **address trends, past and current efforts, including investment and their effectiveness, local data and knowledge**, other relevant factors (as noted below), particularly relative to equitable quality of life, resources, and strategies to address any inequities in quality of life. The analysis should also consider any overlapping fair housing issues with other components of the assessment of fair housing (e.g., access to opportunity and disproportionate housing needs, including displacement).

Racial/Ethnic Concentrated Areas of Poverty (R/ECAP) and Affluence (RCAA): Analyze some of the census tracts that have significantly higher rates of white population and income as Racially Concentrated Areas of Affluence (RCAA). Adequate analyses of R/ECAPs and RCAAs will help guide goals and actions to address fair housing issues.

Disparities in Access to Opportunity: The element provides some information on access to opportunity for education, economic, transportation, and environmental, but it generally lacks analysis. The analysis of education opportunity should explain differences in school quality from neighborhood to neighborhood and include comparisons of the City to the region for education, economic, transportation, and environmental opportunity.

Disparities in Access to Opportunity: The analysis of environmental opportunity across neighborhoods should match the CalEnviroScreen data presented, which shows clear disparities between census tracts, and should **analyze differences in environmental hazard exposure between census tracts**. Please refer to page 35 of the AFFH guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance>) for specific factors that should be considered when analyzing access to opportunities as it pertains to educational, employment, environmental, transportation, and any factors that are unique to Redlands.

Disproportionate Housing Needs, Including Displacement: The element does include some information on overcrowded households, substandard housing conditions, homelessness, and cost-burdened households, but it must also analyze spatial trends of substandard housing conditions and homelessness.

Disproportionate Housing Needs, Including Displacement: The displacement analysis should consider

- (1) any overlapping fair housing issues with other components of the assessment of fair housing (e.g., access to opportunity and disproportionate housing needs, including displacement),
- (2) displacement risk from environmental hazards such as flood zones, and
- (3) displacement risk of new transit investments and upzoning to existing low-income census tracts in the absence of substantial affordability and anti-displacement programs.

Local Data and Knowledge and Other Relevant Factors: 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.

Local Data and Knowledge and Other Relevant Factors: The element should analyze historical land use and investment practices or other information and demographic trends. While the element includes some information on the history of Redlands (pp. 215-216), it should also describe historic spatial patterns of segregation (ex: spatial patterns of racially restrictive covenants, historic patterns of where residents of different racial/ethnicity backgrounds lived, historic preservation districts, etc.), the environmental justice impacts of the siting of infrastructure and industrial uses, the City's history of anti-growth land use measures, and the lasting impacts of these actions.

Contributing Factors: The element must list and prioritize contributing factors to fair housing issues. While the element includes a list of 11 contributing factors, these factors should be prioritized based on the outcomes of a complete analysis. In addition, some of these contributing factors seem detached from the Assessment of Fair Housing analyses, while other salient fair housing issues identified in the Assessment of Fair Housing are missing from the list of contributing factors (e.g., North/South segregation by race/ethnicity and income, regional patterns of segregation by race/ethnicity and income, anti-growth and land use constraints). Finally, some contributing factors identified in the element lack adequately responsive programs (these include, but are not limited to displacement and increasing rents, community opposition).

Site Inventory: The element includes maps and graphs of the site inventory that indicate a further entrenchment of existing fair housing issues, and the site inventory is not accompanied by adequate programs to ameliorate these impacts. Furthermore, some of the conclusions in the AFFH site inventory analysis do not reflect the data – the transit villages areas are not high opportunity areas according to the TCAC/HCD opportunity maps, but rather shown as areas of high segregation and poverty, low resource, or moderate resource. **The analyses, such as Figure 7.3-5 RHNA Units and City Acreage Comparison by Non-White Population, should address RHNA units by income groups (lower, moderate, and above moderate).** While the transit village areas will eventually provide better access to transit mobility options and represent an exciting transit-oriented development opportunity, the element should expand the analysis and list of sites to better formulate development opportunities, goals, actions, and metrics that will result in broader equitable quality of life throughout the community.

Site Inventory: The analysis of identified sites should address the significant lack of housing opportunities for lower-income households in the southern portion of the city that are proportionally whiter, more affluent, have significantly improved environmental quality of life, better performing schools, and score higher on the access to opportunity maps so to address fair housing issues and avoid an isolation of the RHNA.

Goals, Priorities, Metrics, and Milestones: The element must add or revise programs based on a complete analysis, listing, and prioritization of contributing factors to fair housing issues. Goals and actions must significantly seek to overcome contributing factors to fair housing issues and include metrics and milestones to target meaningful fair housing results. Currently, the element identifies programs to encourage and promote affordable housing; however, most of these programs do not appear to facilitate any meaningful change nor address AFFH requirements. Given that significant portions of the City are considered high-income/opportunity areas, and because Redlands is significantly whiter and wealthier than San Bernardino County, the element could focus on programs that enhance housing mobility and encourage development of more affordable housing choices in an inclusive manner throughout the community. Furthermore, the element must include programs with substantial place-based investments and protection against displacement in areas of high segregation and poverty. For more information, please see HCD's guidance at <https://www.hcd.ca.gov/community-development/affh/index.shtm>.

Extremely Low-Income (ELI) Households: While the element identifies the projected number of ELI households, it must still analyze their existing housing needs. This is particularly important given the unique and disproportionate needs of ELI households. For example, the element could analyze tenure, cost burden, overcrowding and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

Housing Conditions: The element quantifies the age of the housing stock and includes some information on housing characteristics such as lacking plumbing or kitchen facilities. However, it must also estimate the number of units in need of rehabilitation and replacement. For example, the analysis could utilize information from the housing element update survey (Appendix C), estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable organizations. This information could be analyzed geographically as part of the assessment of fair housing. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

Progress in Meeting the RHNA: The RHNA may be reduced by the number of new units built, permitted, approved or pending since July 1, 2021. The element lists (p. 57) 80 units affordable to lower-income households but it should also demonstrate affordability based on actual or anticipated sales price, rents or other mechanism ensuring affordability (e.g., deed-restrictions).

Small Sites: For your information, sites below 0.5 acres are not deemed adequate to meet the lower-income RHNA absent analysis that development below 0.5 acres is appropriate to accommodate the lower-income housing need. Some of these small sites were utilized toward demonstrating adequate sites to accommodate the lower-income RHNA and should not be utilized for the purposes of meeting no net loss law pursuant to Government Code section 65863.

Accessory Dwelling Units (ADU): The element assumes 15 ADUs per year for a potential buildout of 120 units within the planning period. According to HCD records, the City has permitted an average of 10 units per year, less than the 15 units assumed in the element. The trends noted in the element appear inconsistent with HCD records and, further, are lower than the assumption of 15 ADUs per year. To support assumptions for ADUs in the planning period, the element should either reconsider assumptions, reconcile trends with HCD records or include additional information such as more recent permitted units and inquiries, resources and incentives, other relevant factors and modify policies and programs as appropriate.

Infrastructure: The element must demonstrate sufficient existing or planned water, sewer, and other dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the City regional housing need for the planning period. (Gov. Code, § 65583.2, subd. (b).) Furthermore, the element should address which sites may lack access to infrastructure, as p. 65 of the element states that some sites do not have existing infrastructure service. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental>.

Environmental Constraints: The element must describe environmental conditions within the city, relate those conditions to identified sites, and describe any other known environmental or other constraints that could impact housing development on identified sites in the planning period. This is particularly significant as it appears that the downtown and surrounding areas where a large share of development is planned, is subject to significant flood risk.

Electronic Sites Inventory Form: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Zoning for a Variety of Housing Types:

Emergency Shelters: The element should clarify if there are any spacing requirements and provide greater detail regarding development standards and whether they pose a constraint to the development of emergency shelters.

Zoning for a Variety of Housing Types:

Permanent Supportive Housing: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate.

Zoning for a Variety of Housing Types:

Employee Housing: Health and Safety Code section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Health and Safety Code section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. The element must demonstrate zoning in compliance with these requirements or include programs as appropriate.

Measure U: The element explains a few aspects of Measure U such as limits on density, heights, residential unit allocations and traffic levels of service. However, the element should include a complete analysis to better formulate a programmatic response to this severe constraint. For example, the element should discuss potential conflicts with state law, including housing element and state density bonus law. The element should also address the full range of options for exceeding limits in Measure U, timing and cost impacts of a 4/5th vote, including approval findings, any and all other limits on development and how the Measure relates particularly to rezoning sites and accommodating the RHNA. The analysis should address impact on housing cost, supply, fair housing choice throughout the city, affordability, timing and approval certainty. Based on the outcomes of this analysis, the element must revise programs.

Historic Preservation Measures: The element should provide greater detail and fully analyze the South Redlands Housing Conservation Overlay and the City Design and Preservation element processes mentioned on p. 93 as potential constraints to housing development for all income levels.

Processing and Permit Procedures: The element indicates that multifamily developments of 35 or more dwelling units are subject to a conditional use permit (CUP). The prior housing element had a program to address the CUP and 35-unit threshold as constraints. Instead, the City merely evaluated the requirement is not a constraint and appears to have eliminated the program. The element (p. 100) also concludes the requirement is not a constraint because multifamily has been approved recently and because the process is no different between rental and ownership development. However, recent multifamily approvals and treating developments the same are not necessarily indicators that these requirements are not constraints. A threshold of 35 units is a constraint and so is the potentially roving approval findings of "...the proposed development is appropriate at the proposed location." The element should include additional analysis of the threshold and approval findings for impacts on approval certainty, timing and cost and add or modify programs.

Building Codes and Their Enforcement: The element provides an overview of the building code, but it should also identify any local amendments to the building code and analyze impacts on the cost and supply of housing.

Streamlined Ministerial Approval Permit Procedures: The element should describe the City's SB 35 (Chapter 366, Statutes of 2017) streamlined ministerial approval procedure and application and include programs if appropriate.

Zoning, Development Standards, and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards, and fees on the City's website and include programs if appropriate.

Constraints on Housing for Persons with Disabilities:

Definition of Family: The element should describe any zoning code definition of a family and analyze as a potential constraint on housing for persons with disabilities.

Constraints on Housing for Persons with Disabilities:

Group Homes with Six or Fewer Persons: The element describes that group homes for six or fewer persons are permitted in all residential zones. However, these provisions appear to be limited to group homes licensed by the state. Yet, the state does not license all community care facilities or group homes serving six or fewer persons. The element should either clarify that group homes without licenses are also allowed in all residential zones or include a program to address this constraint on housing for persons with disabilities.

Constraints on Housing for Persons with Disabilities:

Group Homes for Seven or More Persons: The element subjects group homes for seven or more persons to a CUP and limits them to multifamily and agricultural zones, unlike other similar uses. While the element includes Program 1.2-5 to implement mitigating strategies, the element should specifically analyze these constraints for impacts on housing supply and choices, approval certainty and objectivity for housing for persons with disabilities and modify Program 1.2-5 as appropriate such as committing to allow these uses in all zones that allow residential uses.

Developed Densities and Permit Times: The element must analyze requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis must address any hinderances on the construction of a locality's share of the regional housing need.

The element includes some general quantification; however, the element should include analysis of households with special housing needs. The analysis should include, but is not limited to, factors such as trends, household income, tenure, housing types, zoning, and available resources.

Homelessness: The element includes three different numbers for the 2020 Point-in-Time Count on pp. 51, 100, and 111. Clarify which is the correct, most recent Point-in-Time count and use consistently throughout the element. The element must quantify the total number of persons experiencing homelessness and analyze their special housing needs.

Farmworkers: The element indicates there are farmworkers employed in fulltime farming occupations in Redlands. In addition, farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. The element should acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

The element states (p. 33) there may be additional projects, funded by the former Redlands Redevelopment Agency, at risk of conversion to market rate uses. If so, the element should identify these projects and include the required analysis. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml> and for more information on identifying units at-risk, see the California Housing Partnership Corporation at <http://www.chpc.net>.

To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, objectives and specific and clear commitment to outcomes. Programs to be revised with discrete timelines (e.g., annually, Spring 2022) include, but are not limited to, Programs 1.1-7 (Development on Nonvacant Sites), 1.3-4 (Priority Water and Sewer Service), 1.3-6 (Outreach and Education), 1.5-10 (Non-profit Housing Development) and 1.6-1 (ADU Educational Campaign).

As noted in Finding B4, 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.

Program 1.1-1 (RHNA Rezoning) : The Program should commit to a minimum acreage to be rezoned and meet all requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) such as permitting multifamily uses without discretionary action and residential only and affordability requirements.

Program 1.1-2 (Transit Villages Specific Plan) : The Program should commit to allowable densities, acreages, anticipated units and to meet by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) to the extent necessary.

Program 1.3-1 (Surplus Lands) : The Program could consider a schedule of actions including commitment to facilitate development such as zoning, incentives and expediting permit procedures.

The element must include a program(s) to assist in the development of housing affordable to lower-income households, including ELI and special needs households. This is particularly important given that the City only developed 1 very low-income unit during the 5th cycle planning period. Program actions could include prioritizing some funding for housing developments affordable to ELI households or households with special needs, offering financial incentives or regulatory concessions, expediting or streamlining permit procedures, reducing fees and leasing land. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and nongovernmental 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, the element, including public comments, note several constraints that warrant programs. For example, the element concludes Measure U is a constraint as well as minimum lot sizes (p. 95). The City also received comments to establish quarterly meetings with builders (p. C-17). The element should include programs to address these issues. In addition, while Program 1.2-8 (Socio Economic Cost Benefit Studies) commits to objective standards, it should consider additional measures like removing the requirement or pursue a more comprehensive City initiated study and should include a mid-term evaluation of effectiveness with commitment to alternative actions within a certain time.

2022 Local Voter Initiative: HCD understands the Town Village Specific Plan is subject to a local voter initiative that, if approved, would essentially remove the City's strategy to accommodate the RHNA, including by income group. As a result, the element must include program actions with timelines related to the initiative including a commitment to immediately remedy any impacts on the City's adequate sites strategy or HCD may revoke housing element compliance pursuant to Government Code section 65585, subdivision (i).

As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs to have specific commitment, milestones, and metrics to overcome fair housing issues and to enhance housing mobility strategies, encourage development of new affordable housing in high resource areas, improve place-based strategies, and protect residents from displacement.

The element identifies housing units at-risk of converting to market-rate and includes Program 1.4-1 to monitor the units to ensure tenants receive proper notifications. However, Program 1.4-1 must also commit to proactively coordinate with qualified entities, assist with funding or support funding applications and educate, support and assist tenants.

The element must include quantified objectives estimating the number of housing units by income category that can be constructed, rehabilitated, and conserved in the planning period.

While Appendix C summarizes many of the public comments and describes how they were considered and incorporated into the element, HCD urges the City to **re-evaluate comments related to Measure U and other land use constraints, community opposition to denser housing types**, and the appropriateness of some identified sites.

Clarify whether a full draft element was available to the public before its submittal to HCD. On the call, City staff indicated it may have only been available for one week prior to submittal to HCD. By not providing adequate time for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment at least three to four weeks prior to submittal to HCD is essential to the public process and HCD's review.

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 revising the 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.

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Response/Revision

Various details added in Section 6, including details During the last cycle the city did not have enough staff to address the quantity of programs. The Development Services Department experienced challenging periods of high staff turnover and leadership changes resulting in many programs being placed on hold. The loss of Redevelopment also factored into the City's ability to implement or fund certain programs. The fifth cycle had less description/commitment. More details are being provided upfront for the sixth cycle. The City has addressed this by establishing clear timelines and objective standards. Additionally, the Development Services Department has seen stability in both leadership and staff and has identified a Principal Planner to oversee long range planning programs and projects.

Added in the review of past programs that a record was not kept but that it will be modified to be reviewed annually. Modified program 1.3-6 to include foreclosure assistance and to add an annual update timeline.

The evaluation consisted of a review of all applications for Multi-Family projects. It was determined that projects that proceeded beyond the completeness review were unaffected by the requirement to obtain an CUP and were subsequently approved. No multi-family projects requiring a CUP were denied.

Changed the review to say the program was discontinued. Also included information on number of individuals/households assisted.

Included information on number of individuals/households assisted during the 5th Cycle.

Included information on number of individuals/households assisted during the 5th Cycle with emergency food/rental assistance and Shelter/Transitional Housing. Information specific to the Buy-Out programs was not available from City staff. High staff turnover and multiple transitions during the 5th Cycle has resulted in inconsistent record keeping.

Information on the number of individuals/households has been included. 403 households were assisted through this program.

Added a section entitled Effectiveness at Assisting Special Needs Populations in the review of past accomplishments. Details efforts to assist the extremely low income population, persons experiencing homelessness and the elderly, including details on organizations receiving CDBG funds (Family Service Center of Redlands and Inland Temporary Homes), services supporting seniors and the police department's community outreach coordinator.

Expanded upon the existing narrative and clarified conclusions regarding racial makeup of the City. Added data comparing the racial makeup of the City to the Region.

Clarified that Table 2.1-3 does not show a non-white hispanic population, only a hispanic population.

Expanded and clarified analysis of seregation by income trends between the north and south region of the City. Added analysis of income based on lan use in these areas.

Added median income by block group map (Figure 7-7). Added median inome comparison between the City and County. Added relevant programs to summary of integration and segregation.

Referenced TCAC HSP area in R/ECAP and added an analysis of the HSP area including potential contributing factors an the anticipated benefit of the TVSP. Included the location of the University and TVSP as a potential improvement area.

Added discussion of RCAA areas in the City . Added map of income and % non-White in RCAA area (Figure 7-19) and narrative acknowledging that south Redlands is comparatively whiter and wealthier than other areas of the City. Referenced Program 1.6-1 encouraing and incentivizing ADU and SB9 development in the area.

Added narrative describin that Redlands has simialr CES 4.0 scores to jursidictions to the east and higher than those neighboring jurisdictions to the west. Included additional anlysis regarding access to opportunities including data from Great Schools and correspondence with the school district.

Rearranged, added information received from the school district and added transportation information. Added table 7-4 outlining CES scores by census tract with selected CES categories of pollution percentile, poverty percentile, and traffic percentile. Added narrative analyzing new table with those environmental hazards and discussing regional CES 4.0 scores.

Added that the spatial concentration of the homeless population tends to be in the downtown areas.

Inserted text regarding displacement due to TOD and environmental factors such as flood. Also addressed the self-mitigating properties of implementing the TVSP in a low displacement area and its positive effects on access to opportunity and housing needs. This section makes reference to two new programs addressing displacement: Extending covenant timeframes, and facilitating the Tenant Protection Act of 2019.

Integrated public responses from outreach throughout the AFFH and added local knowledge in the City and Sites overview section. Revised and added to the other contributing factors section to fall into the following: environmental justice, history of growth management land use measures, and spatial patterns of segregation.

Added areas with 1960s racial covenants to address spacial and historic patterns of racially restrictive covenants. Added discussion of the impacts of growth management measures and the spatial patterns of segregation in the City.

Added a priority column to Table 7-13 and assigned priorities to the contributing factors based on Government Code section 65583(c)(10)(A)(iv)

Additional contributing factors added to the matrix such as geographic (both regional and citywide) segregation by race/ethnicity and income, historic land use and zoning practices. Added relevant programs and descriptions to the meaningful actions. Added references to additional programs that address contributing factors.

Broke down existing bar charts by income level of the RHNA units. Added discussion throughout AFFH section analyzing the new charts. Revised AFFH so that section 7.2.6 (City and Sites Overview) provides additional summary and rationale of RHNA site placement choices for each geographical area, including discussing how the TVSP provides regional smart growth and transit oriented development opportunities and serves as adequate placement for sites, and lack of sites in south Redlands due to environmental and other constraints. Added EVSP boundary to Tract 06071007800.

To Section 7.2.12 (summary and explanation of sites inventory on fair housing), added description of programs that further fair housing and serve to increase investment in historically underserved areas and efforts to incentivize increased development in south Redlands through ADU and SB9 production.

Added discussion of site inventory including few options in south Redlands to section 7.2.6.2 in the City overview due to constraints such as parcel size, lack of available sewer, and fire hazard. Added reference of program 1.6-1 which encourages and incentivizes ADU and SB9 production in these high resource areas.

Clarified that the tvsp is a place-based investment, its is not residential, redevelopment for tod will not displace
included rent-control program in affh contributing factors matrix

included in description of north/sout redlands segregation that south redlands lack of transit makes it not easily accessible,and it is not a good place for affordable housing

Added Program 1.3-9 for facilitating enforcement of tenant protection measures and displacement prevention efforts.

city support on new programs for banning no-fault evictions and extending affordability covenant time?

Added table 2-45 of CHAS data on ELI overcrowding and cost burden to assess the disproptrtionate needs of ELI households.

Added estimate of 30 units of substandard units based on code enforcement data documenting 26 cases of substandard housing over the past 4 years.

Added additional footnote stating that the developer signed MOUs with the U.S. Veterans Initiative describing that the units would remain affordable. Additionally, the CUP and Density Bonus were approved with findings that the units would be affordable.

Added additional information about lot consolidation, the specific sites, number of estimated units, and characteristics. Referenced existing program to encourage lot consolidation.

Added additional description of trends, programs, and future actions to describe that the assumption of 15 adus per year is realistic.

Added clarifying sentence: In these instances, infrastructure such as water or sewer lines run along major roadways adjacent to potential sites. Provided additional details that the only expansion necessary is extension of laterals to existing infrastructure mains.

Added section 4.2.1 to address environmental constraints such as wildland fires and flooding.

Affirmed that there are no spacing requirements or standards regarding emergency shelters that would be a constraint to development.

This is already included in Program 1.2-3 (Transitional and Supportive Housing). Added details to clarify the program allows supportive housing by right in appropriate zones.

Program 1.2-18 amended to explicitly state that the zoning code will be amended to comply with Health and Safety Code sections 17021.5 and 17021.6 including revising zoning to allow employee housing in all applicable zones throughout the City and permitting employee housing of no more than 12 units or 36 beds the same as other uses in agricultural zones.

Added information on how City makes findings in transit areas and how to get around that right now. The only areas anticipated density > 30 du/acre is in transit village areas and those have a process to determine projects are exempt from Measure U based on objective criteria. That would eliminate 4/5 vote.

Additional nuance and detail has been included about Measure U.

Additional program has been included to evaluate the legality of Measure U under current/anticipated State housing laws.

Inserted discussion addressing Historic Districts and the additional step of obtaining a Certificate of Appropriateness.

Added Program 1.2-14 which removes the CUP requirement for multifamily developments greater than 35 units. Referenced this program in Section 4.1.3.2

Added information that the Building Code has been adopted by reference from the 2019 California Building Code.

Added program 1.2-19 addressing the streamlined ministerial approval process permits.

Added a detailed description of the SB 35 permit procedure in the City.

Added section 4.1.5.2 to clarify information on posting of notices.

Added definition of family to section 2.9.3 and identified it as a constraint. Added program 1.2-17 to change the definition of family so that it will no longer be a constraint to groups of five or more unrelated persons living together.

Amended program 1.2-5 to include the removal of the term "licensing". Also included discussion of this topic under section 4.1.8.

Revised the program addressing group homes to include amending the zoning ordinance to allow group homes in a residential zones. Also included discussion of group homes in the constraints section under 4.1.8.

Included discussion on permit timing and developments of lower densities.

Section 2.9.3 discusses special housing needs and includes analysis of income and tenure, discusses trends between data sets

Clarified which number is total homeless population and which is unsheltered homeless population

Added USDA NASS county level farmworker statistics. 2017 estimates indicate 2,246 workers in the county, of which 546 are migrant workers.

Added program 1.2-18 to comply with Health and Safety Code section 17021.5 and allow farmworker housing in agriculture zones.

Clarified that these units are now housing assets of the Housing Authority of the County of San Bernardino (HACSB) and generally not considered to be at risk. There are no additional units that are at risk.

Added discrete times and occurrences for when these programs would be implemented.

n/a

Added text: The rezoning program would rezone a minimum of 119 acres and, and, will permit multifamily uses without discretionary action. .

Added text: The TVSP will allow for residential densities per the 2035 General Plan and 6th Cycle Housing Element and allow multi-family residential uses.

Added text: Facilitate development through zoning reform, development incentives and expedited permit procedures.

Edited Program 1.2-14, 1.3-7, 1.5-1, and 1.5-10 to prioritize funds for low income and special needs housing.

n/a

Edited Program 1,1-7 to establish quarterly meetings with developers. Also edited Program 1.2-8 to reference a midpoint evaluation of the program and a provision to consider new measures if the effectiveness of the changes to the Socio-Economic Study.

Program added to Table 5.7

A complete AFFH analysis is contained within Section 7 of the Housing Element. Programs directly influenced by the outcome of the AFFH analysis include: 1.1-3, 1.2-13, 1.3-9, 1.3-6, 1.3-7, 1.3-7, 1.3-8, 1.3-9, 1.5-1 through 1.5-11, and 1.6-1,

Added text: Preservation of at risk housingThe City has an inventory of 120 publicly assisted housing units affordable to lower income households. These units are deed restricted for long-term affordability. Between October 15, 2021 and - Proactively coordinate with qualified entities.

-Assist with funding or support funding applications.

-Educate, support and assist tenants.

5 -year projection/commitment. Added quantified objectives for construction, rehabilitation, and preservation.

Appendix C section 8.1.3.5 has been clarified to indicate policies that address Measure U. Section 4.1.1 of the Government Constraints section further clarifies information about Measure U, the ability to meet the RHNA under Measure U and the proposed 2022 Ballot Measure. Appropriateness of sites is addressed under section 3 - Housing Resources & Sites Inventory with subsection 3.12 addressing site clusters.

The City has made a diligent effort to encourage public participation in the development of the Housing Element. It has done so by:

- Creating and maintaining a comprehensive HE Update webpage on the City's website.
- Creating and maintaining an interactive RHNA webmap that has been available to the public more than 7 months
- Contacting and interviewing numerous stakeholders
- Hosting a bilingual survey open to anyone living/working/attending school in Redlands or otherwise affiliated
- Hosting 2 community workshops that were very well advertised via press release, social media, newspaper publishings, City website banners on the home page, Redlands TV announcements, announcements at regularly scheduled City Council and Planning Commission meetings, and physical postings at the City Clerk's office.
- Hosting public study sessions with the Planning Commission and City Council that were advertised
- Maintaining a contact list for notifications and update to be sent directly to interested parties

The complete draft was available 1 week prior to HCD submission in order to best comply with HCD statutory deadlines (the sites inventory interactive map had been available for several months prior). The Government Code does not define a period of time for public review prior to HCD. The City has been actively engaged with the public throughout the development of the housing element as required by Government Code.

Added the following note to section 7.2.1 (Outreach activities): The City made the draft housing element available online for public comment and considered and incorporated public comments in the revised housing draft before the Planning Commission hearing on December 14, 2021. The revised draft element was also made available to the public and directly to stakeholders and commentators on December 21, 2021.