

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannon Street, Suite 400  
Sacramento, CA 95811  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



August 7, 2025

Barry Tippin, City Manager  
City of Redding  
777 Cypress Avenue  
Redding, CA 96001

**RE: City of Redding Housing Element Program Implementation - Corrective  
Action Letter**

Dear Barry Tippin:

The California Department of Housing and Community Development (HCD) has reviewed the City obligations under the housing element and hereby issues its written findings that the City of Redding (City) has failed to implement Program Action 2.5 (Zoning Code Amendment: "RM", Residential Multiple Family District) to allow by-right processing of sites identified in previous housing elements pursuant to Government Code section 65583.2, subdivision (c).

HCD requests that the City review this correspondence and provide a written response to these findings within 30 days and no later than September 5, 2025. HCD will review and consider the City's written response before taking any action authorized by Government Code section 65585, subdivisions (i) and (j). As noted below, such action may include revoking HCD's finding that City housing element is in substantial compliance with California's Housing Element Law and/or referral to the California Office of the Attorney General.

**Housing Element Law**

HCD must review any action or failure to act by a City that it determines to be inconsistent with an adopted housing element or section 65583 generally, and it must issue written findings to the City accordingly.<sup>1</sup> HCD must give the City a reasonable time, no longer than 30 days, to respond to these findings.<sup>2</sup> If HCD does not receive a written response from the City within 30 days, or the response does not demonstrate that the program action has been implemented, then HCD will revoke its findings that the City's housing element substantially complies with Housing Element Law.<sup>3</sup>

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<sup>1</sup> Gov. Code, § 65585, subd. (i)(1)

<sup>2</sup> Gov. Code, § 65585, subd. (i)(1)(A)

<sup>3</sup> Gov. Code, § 65585, subd. (i)(1)(C)

Additionally, HCD may notify the California Office of the Attorney General when a City takes actions that are inconsistent with an adopted housing element or Government Code sections 65583 and 65915, among other laws.<sup>4</sup>

## Findings

On June 19, 2020, HCD found the City housing element in substantial compliance with Housing Element Law. HCD based its compliance finding on, among other things, a commitment to implement Program 2.5. This program commits to rezoning Prior Identified Sites identified to accommodate the low- and very low-income Regional Housing Needs Allocation (RHNA) and was to be completed in FY 2020-2021. The Annual Progress Report (APR) from 2024 states that zoning ordinance amendment is expected to be updated by the end of 2025. As this rezoning action was required to be completed within three years from the date of adoption (June 2, 2023), this new expected completion date exceeds the statutory completion date<sup>5</sup>. Based on the submittal timeline, HCD finds that the City has failed to implement this required rezone program action within the statutory required timeframe.

Additionally, HCD's June 19, 2020, compliance letter was based on the City's responsibility to complete Programs according to timeline commitments. As the commitment date has passed for the programs listed below, HCD requests that the City provide an update on the status, specific timeline for completion including any remaining steps of the following Programs:

- Program 2.6 (Amend the City's Accessory Dwelling Unit (ADU) Ordinance) was due by June 2, 2021. The APR from 2024 states that the ordinance was brought into compliance in 2020 and that the Development Services Department intends to evaluate and update the ordinance if necessary, by the end of the 2025 Fiscal Year. The City should confirm that the Program has been completed and provide the accompanying documentation (e.g., ordinances, resolutions, zoning codes, etc.) in addition to providing a timeline for updated program actions.
- Program 2.8 (Zoning Code Amendment to Facilitate Development of Low Barrier Navigation Centers) was due by June 2, 2021. The APR from 2024 states that the zoning ordinance amendment is expected to be updated by the end of 2025.
- Program 2.9 (Zoning Code Amendment to Provide Increased Opportunities for Development of Supportive Housing) was due by June 2, 2021. The APR from 2024 states that the zoning ordinance amendment is expected to be updated by the end of 2025.
- Program 2.11 (Review the Homeless Shelter provisions of the Zoning Code for consistency with state law) was due by December 31, 2022. The APR from 2024 states that the zoning ordinance amendment is expected to be updated by the end of 2025.
- Program 2.12 (Amend the Zoning Code to accommodate farmworker housing in appropriate zoning districts in accordance with state law) was due by

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<sup>4</sup> Gov. Code, § 65585, subd. (j)

<sup>5</sup> Gov. Code, § 65583, subd. (c)(1)(A)

December 31, 2022. The APR from 2024 states that the zoning ordinance amendment is expected to be updated by the end of 2025.

- Program 2.13 (Review the Density Bonus provisions of the Zoning Code for consistency with state law) was due by December 31, 2022. The APR from 2024 states that the Residential Density Bonus ordinance was updated in 2024 and is in compliance with state law. The City should confirm that the Program has been completed and provide the accompanying documentation (e.g., ordinances, resolutions, zoning codes, etc.).
- Program 4.1 (Marketing of City-Owned Parcels) was due by December 31, 2022, and has an ongoing commitment. The APR from 2024 states that the City is in partnership with a local real estate agent to market the City's surplus properties. The City should confirm what actions have been completed under the Program and provide the accompanying documentation (e.g., ordinances, resolutions, zoning codes, etc.).

## Conclusion

Housing elements are essential to developing a blueprint for growth and are a vital tool to address California's prolonged housing crisis. Accordingly, state law has established clear disincentives for local jurisdictions that fail to comply with Housing Element Law. To ensure the City continues to meet the 6<sup>th</sup> cycle update requirements for a substantially compliant housing element, the City must submit any adopted ordinances or resolutions to HCD for review or documentation that demonstrates that housing element program commitments have been met.<sup>6</sup>

Various consequences may apply if the City does not have a housing element in compliance with Housing Element Law, including ineligibility or delay in receiving certain state funds, referral to the California Office of the Attorney General, court-imposed financial penalties, the loss of local land use authority to a court-appointed agent, and the application of the "builder's remedy."<sup>7</sup>

HCD provides the City until September 5, 2025, to provide a written response to these findings. If you have questions or need additional information, please feel free to contact Sayed Murad of our staff at [Sayed.Murad@hcd.ca.gov](mailto:Sayed.Murad@hcd.ca.gov).

Sincerely,



Melinda Coy  
Housing Accountability Unit Chief

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<sup>6</sup> Gov. Code, § 65585.

<sup>7</sup> Gov. Code, §§ 65585, subds. (j), (l)(1), (i); 65589.5, subd. (d)(6).