

**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)



June 2, 2025

Charles M. Duggan, City Manager  
City of Redlands  
35 Cajon Street, Suite 200  
Redlands, CA, 92373

**RE: City of Redlands Housing Element Implementation – Corrective Action Letter**

Dear Charles M. Duggan:

The California Department of Housing and Community Development (HCD) has reviewed the City of Redlands' (City) obligations under the housing element and hereby issues its written findings that the City has failed to implement Program 1.1-1 (RHNA Rezoning) to rezone adequate sites to satisfy its Regional Housing Needs Allocation (RHNA) shortfall and Program 1.1-4 (By-Right Approval of Projects with 20 Percent Affordable Units on "Reused" Site) to allow by-right processing of sites identified in previous housing elements.

HCD requests that the City review this correspondence and provide a written response to these findings within 30 days and no later than July 2, 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 could include revoking HCD's finding that the City's housing element is in substantial compliance with Housing Element Law and/or referral to the California Office of the Attorney General.

**State 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>

---

<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)(B)

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 October 7, 2022, HCD found the City's housing element in substantial compliance with Housing Element Law. HCD based its compliance finding on, among other things, a commitment to implement housing element Programs 1.1-1 and 1.1-4. To address the City's Regional Housing Needs Allocation (RHNA) shortfall, Program 1.1-1 committed to rezoning 119 acres to accommodate the lower-income housing need by October 31, 2024. Program 1.1-4 committed to allowing by-right processing of sites identified in previous housing elements pursuant to Government Code section 65583.2, subdivision (c).

On February 6, 2025, The City submitted Resolution No. 8655 to HCD requesting an extension of one year from the statutory deadline (February 12, 2025) to complete required housing element rezones under Government Code Section 65583.4, subdivision (b). Under this provision, a City may be granted an extension of one year to complete required housing element rezones if the City completed rezonings to accommodate at least 75 percent of their lower-income RHNA and adopted a resolution with findings based on substantial evidence that they were unable to complete the rezoning because of actions or inactions taken by State, Federal, or Local Agencies beyond the City's control. The resolution and findings must then be submitted to HCD with a detailed budget and schedule for preparation and adoption of the required rezonings.

While Resolution No. 8655 provides a detailed budget and schedule for preparation and adoption of required rezonings, the City does not meet the statutory requirements for the one-year extension granted under Government Code Section 65583.4, subdivision (b). Specifically, while the resolution states that the City has sufficient existing capacity to accommodate 75 percent of its lower income RHNA, it has not completed any portion of its rezonings to meet its RHNA shortfall for lower income as required by statute. In addition, communication with City staff on May 19, 2025, confirmed that Program 1.1-4 has not been implemented.

Based on this determination, HCD finds that the City has failed to implement the required rezone program actions within the statutorily required timeframe.

---

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

**Next Steps**

HCD provides the City until July 2, 2025 to send a written response to these findings. If you have questions, need additional information, or wish to schedule a meeting, please contact Reid Miller, at [Reid.Miller@hcd.ca.gov](mailto:Reid.Miller@hcd.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Melinda Coy", followed by a long, sweeping horizontal stroke.

Melinda Coy  
Housing Accountability Unit Chief