

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 Allocation (RHNA) with realistic development capacity. The RHNA is broken down by income group into four categories: very low (less than 50 percent 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. 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.

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 3-1: 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 nonresidential 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 3-2: 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 1,808 units (1,728 above-moderate units and 80 low-income units), which are expected to be constructed during the 6th Cycle production period.

TABLE 3-3: 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. In building permit plan check.	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. In building permit plan check.	80	Lower
Heritage Specific Plan	207 above moderate-income units.	Approved. Partially constructed.	207	Above Moderate
Casa Loma Apartments	147 multi-family residential units on 5.7 acres.	Approved. In building permit plan check.	147	Above Moderate
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.	Approved in 2021. Challenged on CEQA, lawsuit has been settled.	317	Above Moderate
State Street Village (Redlands Mall site)	Transit-oriented development with mixed uses (residential, retail, and office) on 11 acres in downtown Redlands.	Approved in 2022. Not yet built.	700	Above Moderate
Total			1,808	

Source: City of Redlands, Development Services Department.

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 US Veterans Initiative specify that the units are to remain affordable for lower-income veterans.

3.4 PENDING PROJECTS

In addition to projects that have already been approved, the City is currently processing entitlements for another 808 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
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
Lugonia Village	Multifamily residential apartments, single family attached and single family detached homes located near I-210 and commercial services.	Development proposed, undergoing entitlement review, not yet approved.	500
LuxView Apartments, Phase II	In 2019, LuxView entitled a 328-unit multi-family apartment project on the Property. The base density on the Property is 328 units. LuxView intends to modify the 2019 entitlement to add density bonus units to the Property pursuant to State Density Bonus Law. By providing either 50 very low-income units, 79 low-income units, or 145 moderate units, LuxView is entitled, pursuant to State Density Bonus Law, to a 50% density bonus, or an additional 164 units on the Property.	Development proposed, undergoing entitlement review, not yet approved.	164
Total			808

3.4.1 Redlands Mall Redevelopment (State Street Village)

The Redlands Mall site is 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 approved project 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.

On May 10, 2022, the City Council approved entitlements for the redevelopment of the Mall the site which includes 700 dwelling units consisting of apartments and townhomes, restaurants, retail shops, and commercial services. More specifically, the site is approved for:

- Five mixed-use buildings up to four stories high, one of which will be wrapped around a five-level parking structure with 686 spaces.
- Two subterranean parking garages with 415 and 225 spaces.
- Up to 700 apartments and condominiums.
- An approximately 6,000-square-foot recreational amenity building.
- Up to 71,778 square feet of commercial floor area on ground floors for retail and restaurant uses, as well as a rooftop restaurant.
- Up to 12,328 square feet of office space.
- A public plaza area, shade trees, street trees, and pedestrian improvements.
- A 14,500-square-foot building across Citrus Avenue from the main project to house the mall's last tenant, CVS Pharmacy.

Prior to entitlement, the Mall site was 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 the then proposed mixed-use and transit-oriented development project for the Redlands Mall site and associated adjacent properties qualified for exemption from the Redlands General Plan provisions established by Measure U. This decision enabled the City to consider and approve project entitlements that exceeded the 18 du/ac and 3-story building height for high-density residential developments.

The approved project 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 ADU permits, three in 2018, eleven in 2019, and fifteen 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 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 preapproved 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 3-5: 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 3-6 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 3-6: 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 3-7: 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 3-7. 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 3-8: PRD DEVELOPMENTS IN R-E ZONE

Category	Project	Zoning	General Plan	Maximum Density (du/ac)	Acres (Gross)	Units	Yield %	Status
PRD	TTM19975 (Diversified Pacific)	PRD R-E	VLDR	3	24.9	67	89.7%	Built
PRD	TTM16465 (Judson Ranch - West)	PRD R-E	VLDR	3	30.4	61	66.9%	Built
PRD	TTM16627 (Judson Ranch - East)	PRD R-E	VLDR	3	12.1	20	55.1%	Built
PRD	TTM18882 (Patterson Ranch)	PRD R-E	VLDR	3	9	26	96.3%	Built
PRD	TTM15937 (University Grove)	PRD R-E	VLDR	3	61.27	164	89.2%	Built
PRD	TTM18979 (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 3-9: 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 3-10: 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 that 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, and 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 including Program 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 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

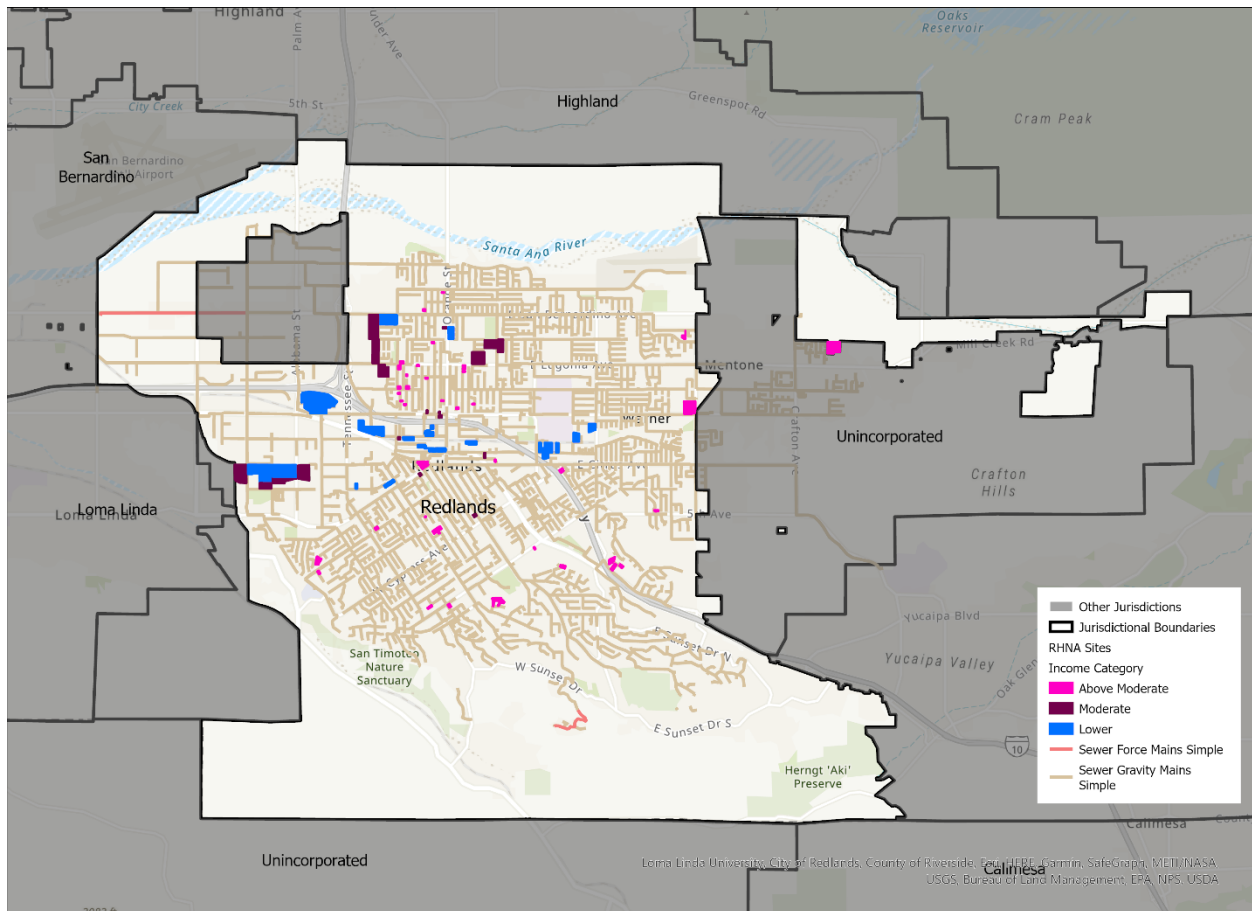
3.11.1 Infrastructure

All of the selected RHNA sites have utility access and are expected to utilize existing adjacent or nearby infrastructure and capacity after redevelopment. The City has adequate infrastructure capacity to accommodate the projected 4,291 new units.

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 run along major roadways adjacent to potential sites and 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



Sewer Mains



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 hillsides 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 developments 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 2 feet above the 100-year flood elevation, or by locating parking on the ground floor, as is typical in popular podium-style building typology (also known as Type 5 over Type 1 construction). A podium-style development is normally constructed with four or five wood-frame stories above a concrete podium (usually for retail or resident amenity space).

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 floodplain area containing multi-family housing components totaling approximately 950 units. For these reasons, the floodplain is not currently acting as a constraint to residential development as the demand to develop within the floodplain area is strong, and is not expected to act as a constraint in the future. Sites located within the floodplain are both feasible and appropriate for residential development due to proximity 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 (EVCSP) 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.

Most parcels in the Tri-City Center are between 0.5 and 10 acres, meeting the statutory requirements for lower-income RHNA eligibility. Six 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

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

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 percent (831 of 1,582) 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 3-11: 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 percent 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 five 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 6th Cycle. The site is currently designated for High Density Residential in the City’s general at 30 du/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 downtown Redlands contains one single-family residence at 523 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 EVCSF 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 6th 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 that extend adjacent to the sites on Citrus Avenue and Iowa Street.

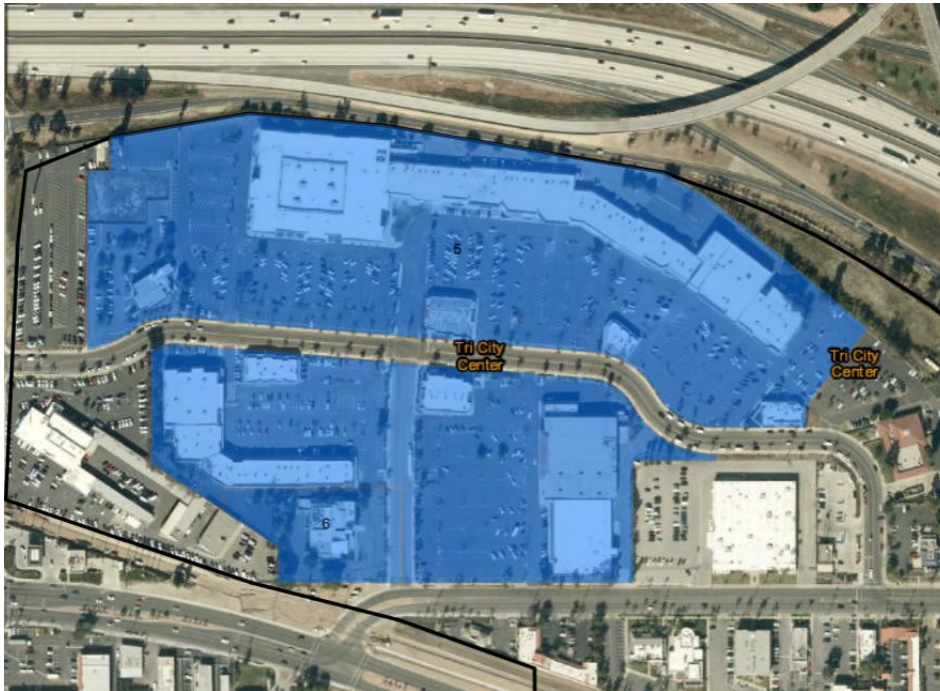


3.13.3 Commercial and Services

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)

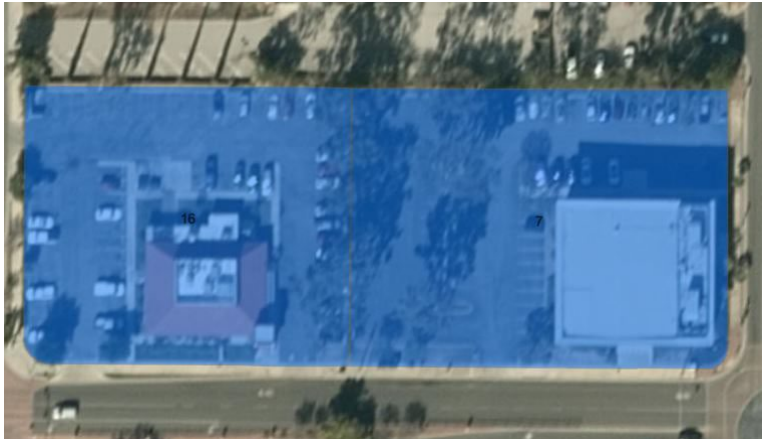


Sites 5 and 6 are currently commercial spaces home to a shopping mall, an indoor playground, and a car dealership located at the Tri-City Center. This site is primarily occupied by surface parking lots, with less than half of the available land developed. It is central to a commercial area with storage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

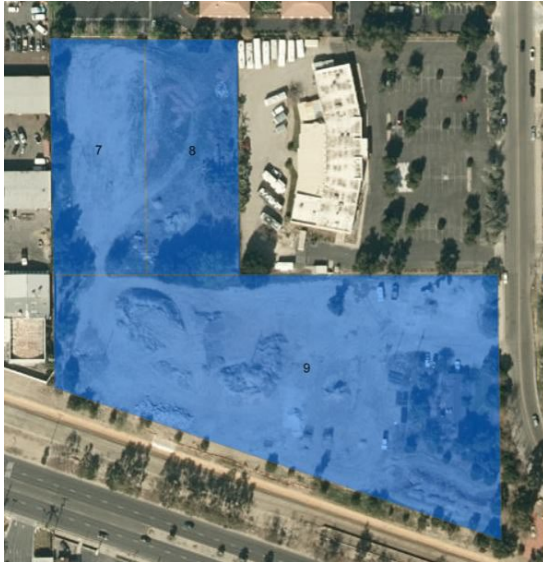


Site 15 currently homes a commercial building at 120 W Redlands Blvd. The existing building takes up the large majority of the parcel with the exception of a small surface parking lot. It is central to a commercial area with restaurants and entertainment, making this location for housing ideal for access 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 building 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.

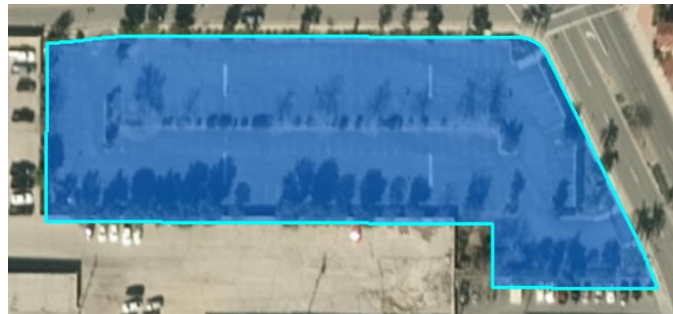


3.13.4 Parking Lots

The inventory contains five 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 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 6th 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 is likely to be redeveloped during the 6th 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

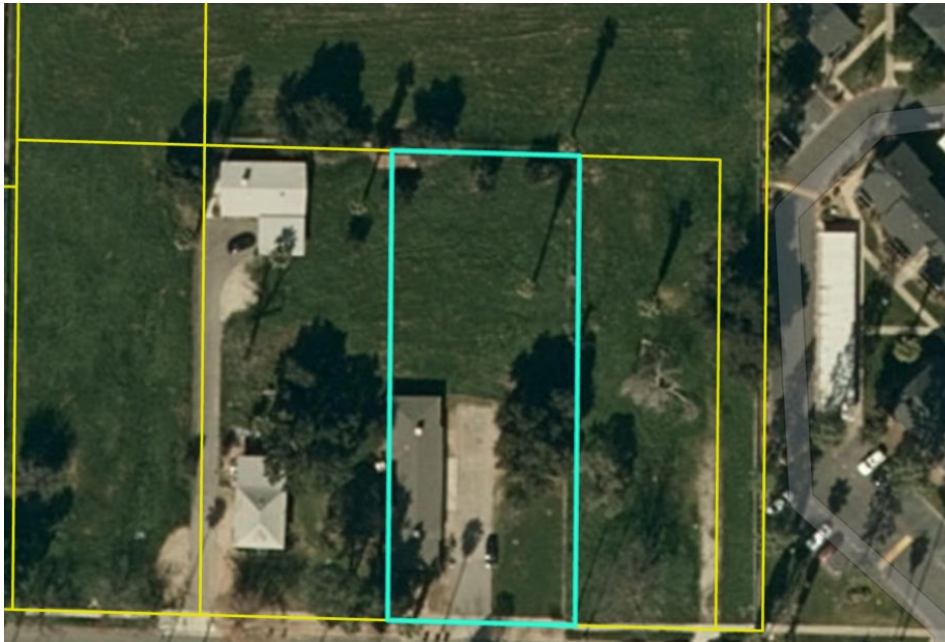


Lower Income Site 49 is currently a preschool with a large surface parking lot and unused vacant space located at 15 N Center St. The site is currently designated high density residential in the City’s and will be included in the TVSP. The site is 1.88 acres and has a maximum capacity of 56 lower-income 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 seven 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 3-12: ADEQUATE SITES

Income/Category	Lower	Moderate	Above	Total
RHNA (+20% Buffer)	1,898	782	1,538	4,218
Identified Sites	2,461	1,052	208	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 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 percent of the lower-income shortfall. Because more than 50 percent 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, 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 (Americans with Disabilities Act [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 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 (ESG) 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 Service 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.

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 US 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 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 Ordinance

The Growth Management Ordinance grew out of the first growth management voter initiative, Proposition R, which 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