

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 Allocation (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 Allocation 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 Allocation (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 1-1 presents Redlands’ allocation of the region’s housing needs by income group as determined by SCAG.

TABLE 1-1: 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 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 Livable Community 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 (TVSP) 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 is adjacent to one disadvantaged "Fringe" community, located within what is known as the Donut Hole. It is bounded by Pioneer Avenue to the North, SR-210 to the East, San Bernardino Blvd to the South, and Alabama Street to the East.

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 undertake the required update to the Healthy Community Element, as required by the Government Code.

1.3.3 Environmental Justice Element

Pursuant to SB 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 to 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, SCAG 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 from all socioeconomic and geographic segments of the community. The public participation program included:

- **An interactive Housing Element update website** launched on February 12, 2021, linked on the City's web page, that included a project description, 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 web page was also provided on the home 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, and 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, and the project planner's contact information. The City also posted the project information on social media platforms. The project planner sent an email to stakeholders and service clubs in the City about the website and the Housing Needs Survey. The City reposted 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 April 26, 2021, and May 13, 2021. Physical flyers were posted on posting locations. A display advertisement was run twice on *Redlands Daily Facts* to advertise the community meetings. Multiple social media postings about the community meetings were made on the City's social media platforms. The project planner sent emails to notify individuals on the mailing list, which included 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 public notification efforts (excluding the newspaper display ad) 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 materials, and a follow-up email announced that the video was posted.
- **One study session with the City Council.** All public notification efforts (excluding the newspaper display ad) 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 materials, and a follow-up email announced that the video was posted.
- **Fair housing focus interviews.** In September 2021, a focus survey regarding fair housing was sent to local service providers and stakeholders. The City made repeated efforts by email and phone to ask service providers and stakeholders to complete the survey.
- **Publication 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 its availability via social media posts as well as 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 was posted on December 21, 2021, along with HCD's November 14 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 web map, project timeline, the draft Housing Element document and all appendices, contact information, and links to other resources to assist the public in understanding the 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. Notifications of 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 and Special Needs**, describes Redlands' demographic and employment trends, characteristics of the City's current housing stock, housing affordability, and energy conservation opportunities. The 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.