7 AFFIRMATIVELY FURTHERING FAIR HOUSING

7.1 INTRODUCTION

Assembly Bill (AB) 686 requires housing elements to analyze any barriers in access to opportunity and to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing. AB 686 asks that a housing element describe population trends and how they may reveal fair housing issues, document trends regarding available housing itself such as year built or overcrowding, and describe improvement goals both for housing condition and for issues relating to fair housing in the population such as patterns of segregation.

7.2 OUTREACH

7.2.1 Outreach Activities

The public participation program engaged community members and stakeholders using the following methods:

- Project website
- Social media postings
- Ads on the Redlands Daily Facts
- Online community survey (in English and Spanish)
- Stakeholder interviews
- Focused AFFH surveys to stakeholders and service providers
- Two virtual community workshops
- Two study sessions with the Planning Commission
- One study session with the City Council

The City experienced difficulty in obtaining responses from local stakeholders and service providers. Repeated calls and emails to the Inland Fair Housing Mediation Board (the County's contracted fair housing service provider that serves Redlands) over the course of many months provided limited information. Other local providers, including those that receive CDBG funding, have yet to respond to the City's AFFH focus survey after three separate requests. However, open-ended questions were included in the public housing needs survey, to which the City received over 300 responses. Some of the respondents commented on discrimination or housing challenges experienced by themselves or people they know. This feedback was used in the identification of issues in the community and the creation of the City's proposed Housing Programs.

City staff maintain a mailing list of individuals interested in the Housing Element update to inform them of all outreach activities. Additionally, City staff continues to maintain a comprehensive Housing Element update web page and answer inquiries that arise regarding the Housing Element update, including participating in ongoing discussions with affordable housing developers who may be interested in pursuing projects in the City. The full summary of community engagement activities and outcomes of outreach and survey results are included in Appendix C.

The City provided a community update on the revised housing draft before the Planning Commission hearing on December 14, 2021, and accepted public testimony. The draft element was made public on December 21, 2021, prior to resubmitting to HCD and prior to adoption by the City Council in February 2022.

7.2.2 Organizations Contacted and Consulted

- San Bernardino County Transportation Authority (SBCTA)
- Inland Fair Housing and Mediation Board
- California Department of Fair Employment and Housing
- Office of Fair Housing and Opportunity
- Redlands Unified School District
- San Bernardino County - Homeless Partnership Interagency Council on Homelessness
- Redlands Area Interfaith Council
- Northside Redlands Visioning Committee
- Family Service Association of Redlands
- East Valley Association of Realtors
- Building Industry Association
- Inland Housing Solutions
- Inland SoCal United Way
- University of Redlands Facilities Management
- Redlands Chamber of Commerce

7.2.3 Summary of Comments

Those who attended the community workshops described five of the most prominent issues pertaining to housing in the City as:

- Cost of housing

- Insufficient housing supply
- Homelessness
- Ability to purchase a home
- Proximity to jobs

The public requested transit accessibility and housing near rail stations, extending beyond the university. This desire for increased transit accessibility also made evident a desire for more density.

Industry stakeholders identified churches, malls, and the "donut hole" as potential sources for infill and land to increase low-income and affordable housing.[19] Density may require rezoning to multifamily residential or the use of unique housing accommodations like accessory dwelling units (ADUs). There is also a continued request for increased density near transit stops, as well as for housing to be built not just anywhere, but in underserved communities so people may continue to live in their community and not have to leave to gain access to affordable housing. Stakeholders had some concern with public perception of infill, but the public involved in the engagement opportunities agreed on the need for increased density to meet housing needs.

The respondents identified low-moderate income person(s), families with children under the age of 18, homeless persons, disabled persons, and people of color as the most vulnerable populations. The public also identified the following programs that they would consider most beneficial to the City:

- Permit streamlining.
    - The following programs improve permit streamlining:
    - 1.1-4 By-Right Approval, 1.1-8 Development on Non-Vacant Sites; 1.1-9 Lot Consolidation and Small Site Development; 1.2-8 and 1.2-9 Ballot Measures; 1.2-10 Objective Design Standards; 1.2-12 Mixed-Use in Commercial Zones; 1.2-13 Remove CUP Requirement for Height; 1.2-14 Waive preapplication fee for affordable projects.
- Preapproved ADU plans.
    - Programs 1.6-1 through 1.6-4 include pre-approved plans and other incentives.
- Inclusionary housing.
    - Program 1.3-2 addresses development of an inclusionary housing program.
- Reduced parking and landscape requirements.
    - Programs 1.1-9 and 1.2-7 addresses revisions to the parking standards.
- Financial resources such as down payment assistance and rental assistance.

[19] The "donut hole" refers to a well-known area within the City limits that is entirely unincorporated and under the land use authority of the County of San Bernardino.

- Program 1.5-10 regarding notice of funding availability for nonprofit housing development

- Placement of affordable housing near amenities (i.e., grocery stores, transit, community and emergency services).
  - Programs 1.1-1 RHNA Rezoning, 1.1-3 Transit Villages Specific Plan both recommend new high density and affordable housing in areas with excellent access to transit, services, public and private institutions, employment and existing and planned urban amenities.

A more in-depth summary of comments received is available in Appendix C.

7.2.4 Public Participation

The multifaceted community engagement process had meaningful input and guidance from a broad cross section of the Redlands community. This began with a new page on the City website detailing the Housing Element update, followed quickly by an online survey in both English and Spanish. One-on-one stakeholder interviews provided a venue for detailed and insightful discussion and recommendations from a broad spectrum of perspectives including service providers, building industry, housing advocacy groups, community service organizations, real estate agents, and educational institutions. These stakeholders also effectively drove constituents to the online survey. There were nearly 300 respondents to the online survey before the first virtual community workshop in April 2021. Survey respondents had high rates of completion of questions including housing needs, constraints, and recommended actions and programs. A second virtual community workshop was held in May 2021.

Due to the COVID-19 pandemic, the two community workshops were held virtually, which may have increased access for those who no longer had to commute to engage, but also may have caused a barrier to access for those with limited computer access or knowledge. To this end, the City provided toll-free call-in numbers for those who may not have ready access to a smart phone or computer. Workshops were hosted on weekdays at 6:00 p.m., which may have overlapped with work hours for some community participants. Concern about the rapidly spiking pandemic may have also overshadowed the Housing Element update. Another significant factor is the relative broad satisfaction and lack of concern over housing issues among the majority of Redlands residents. The vast majority of households in Redlands own single-family homes, are not suffering significant housing burdens, and are therefore less likely to participate in workshops that do not affect their needs directly. This is evident in the nature of the comments received from participants in the workshops, survey, and stakeholder interviews.

Additionally, the City has performed regular social media postings to inform residents about the Housing Element. The City also maintains a mailing list of interested individuals. Members of the mailing list were notified prior to each community, Planning Commission or City Council meeting. The City has also been fielding questions about the Housing Element from the public and from affordable housing developers throughout the duration of the Housing Element update process.

7.3 ASSESSMENT OF FAIR HOUSING

7.3.1 Fair Housing Enforcement and Outreach Capacity

The City of Redlands works with the nonprofit Inland Fair Housing and Mediation Board (IFHMB), which provides information, investigation, education, conciliation, and referral of housing discrimination complaints as it relates to fair housing. Enforcement comes overall, with assistance from IFHMB, from the national Office of Fair Housing and Opportunity (FHEO) and the California Department of Fair Employment and Housing (DFEH). The City refers all fair housing concerns to the IFHMB.[20] There have been 17 total inquiries with 2 fair housing complaints forwarded to FHEO, 0 fair housing complaints forwarded to DFEH, and 0 fair housing complaints forwarded to IFHMB. Of the two complaints, one was on the basis of disability and one was on the basis of national origin. One case was not pursued further and the other was ruled to have no valid basis. Redlands' local fair housing agency, IFHMB, provides fair housing services, landlord/tenant and mobile home mediation, housing counseling, alternative dispute resolution, and senior services. Over the 5th Cycle planning period, the agency responded to 127 complaints within the City of Redlands. Of these, 99 were on the basis of disability, 6 were each on the basis of race, sex, and familial status, 3 were on the basis of age and income, 2 were each on the basis of national origin or were arbitrary. The IFHMB conducted 292 engagements throughout the City during the 5th Cycle planning period.

The agency is available for contact by phone or email. In-person office visits are closed due to the COVID-19 pandemic. As of 2018, IFHMB employs 22 staff members who receive updated fair housing training on a quarterly basis with 5 staff members who are heavily trained on HCD AFFH requirements to maximize capacity to respond to fair housing needs. The IFHMB is funded by Community Development Block Grants, donations, and sponsors.

The City provides Fair Housing information on its website including information on the HOME Affordable Housing Program, Tenant-Based Housing Choice Voucher Program, Project-Based Voucher Program, Term-Limited Lease Assistance Program, and Home Ownership Assistance Program. The City provides contact information for the Housing Authority of San Bernardino County and contacts for emergency housing assistance.

The City's Police Department also periodically conducts Crime-Free Multi-Housing/Rental Property Training programs. This is an eight-hour course that focuses on education and reducing crime in apartments, condominium complexes, and single-family rental housing throughout the City by emphasizing communication with property managers, tenants, and police. Since 1995, the Redlands Police Department has participated in the San Bernardino County Crime-Free Multi-Housing program. The opportunity exists to integrate Fair Housing information into these trainings.

[20] The City of Redlands has made several attempts between May and August 2021 to obtain data from the IFHMB and has notified HCD of the difficulty in obtaining this data. The IFHMB has acknowledged the request, but no data has been transmitted at the time this AFFH appendix was authored.

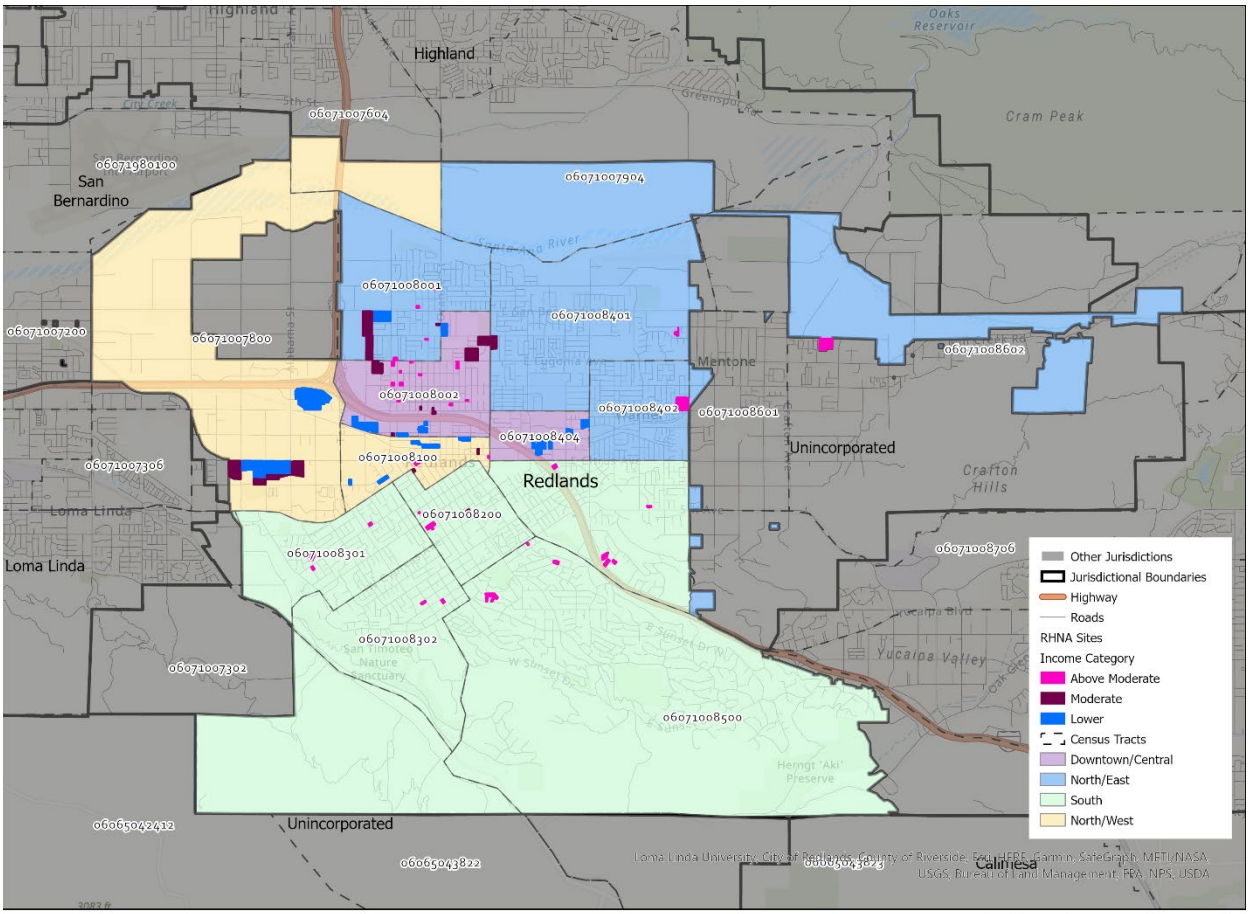
7.3.2 City and Sites Overview

AB 686 also requires that the Housing Element distribute sites identified to accommodate the lower-income RHNA in a manner that furthers fair housing and does not concentrate them in low-resource areas. For a complete assessment of the City's obligation to affirmatively further fair housing, an analysis of the RHNA sites and their impact on fair housing conditions is provided. RHNA sites are shown on a selection of maps by their income level. Additionally, a comparison of the RHNA units by their income level is provided against that of the whole City acreage. Note that these bar graphs do not include pending projects. The City anticipates its above-moderate RHNA units to be satisfied using entirely pending projects, so the bar graphs show the few additionally identified above moderate sites. This does cause a skew in the appearance of the graphs as they show all the identified moderate and lower income units. While this helps to illustrate fair housing patterns across the City, not all land in the City is suitable for additional housing. Specifically, much of South Redlands (generally, south of Highland Avenue) is located within and adjacent to a Very High Fire Hazard Severity Zone coupled with steep slopes (in excess of 15% cross slope) that are regulated by the Hillside Development District (This district is discussed in detail in Section 4.1). This area also lacks sidewalk infrastructure and public transportation connectivity due to the topographical constraints. This increased risk of fire hazards combined with poor mobility options results in this portion of South Redlands not being suitable for higher density development. The area of South Redlands north of Highland Avenue is generally flat terrain developed within a traditional street grid complete with sidewalks and some public transportation connectivity, particularly along Barton Road/Brookside Avenue/Citrus Avenue. The City has encouraged the adaptive reuse of large Victorian era homes in this area as apartment conversions through the application of the R-2 (Multi-family residential district) in the core of this northern portion of South Redlands.

The sites inventory was developed to maximize opportunities for households of all income levels while recognizing and accounting for environmental constraints. The City has prioritized sites in areas served by existing infrastructure, with access to employment centers such as Esri, the University of Redlands, public and private K-12 schools, Loma Linda University Medical Center and the industrial/warehouse district in northwest Redlands. As discussed in the Sites Inventory, RHNA sites can be analyzed in four general clusters, the TVSP Area, EVCSP Area, Tri-City Center Development, and other sites.

Figure 7-1 shows the census tracts in Redlands and divides the City into four geographic regions with similar trends for the purposes of the AFFH analysis. The accompanying Table 7-1 displays the census tracts and their given region. A brief overview of geographic trends and sites within each geographic area are discussed in the breakdown below.

FIGURE 7-1: CENSUS TRACTS, RHNA SITES, AND CITY REGIONS



Census Tracts and RHNA Sites

Source: American Community Survey 2019 5-Year Estimates

TABLE 7-1: CENSUS TRACTS AND CITY REGION

Census Tract	Region
6071007604	North/West
6071007800	North/West
6071008100	North/West
6071007302	South (rural)
6071008200	South
6071008301	South
6071008302	South (hills)
6071008403	South
6071008500	South (hills)
6071007904	North/East (open space)
6071008001	North/East
6071008401	North/East
6071008402	North/East
6071008601	North/East
6071008602	North/East
6071008706	North/East
6071008002	Downtown/Central
6071008404	Downtown/Central

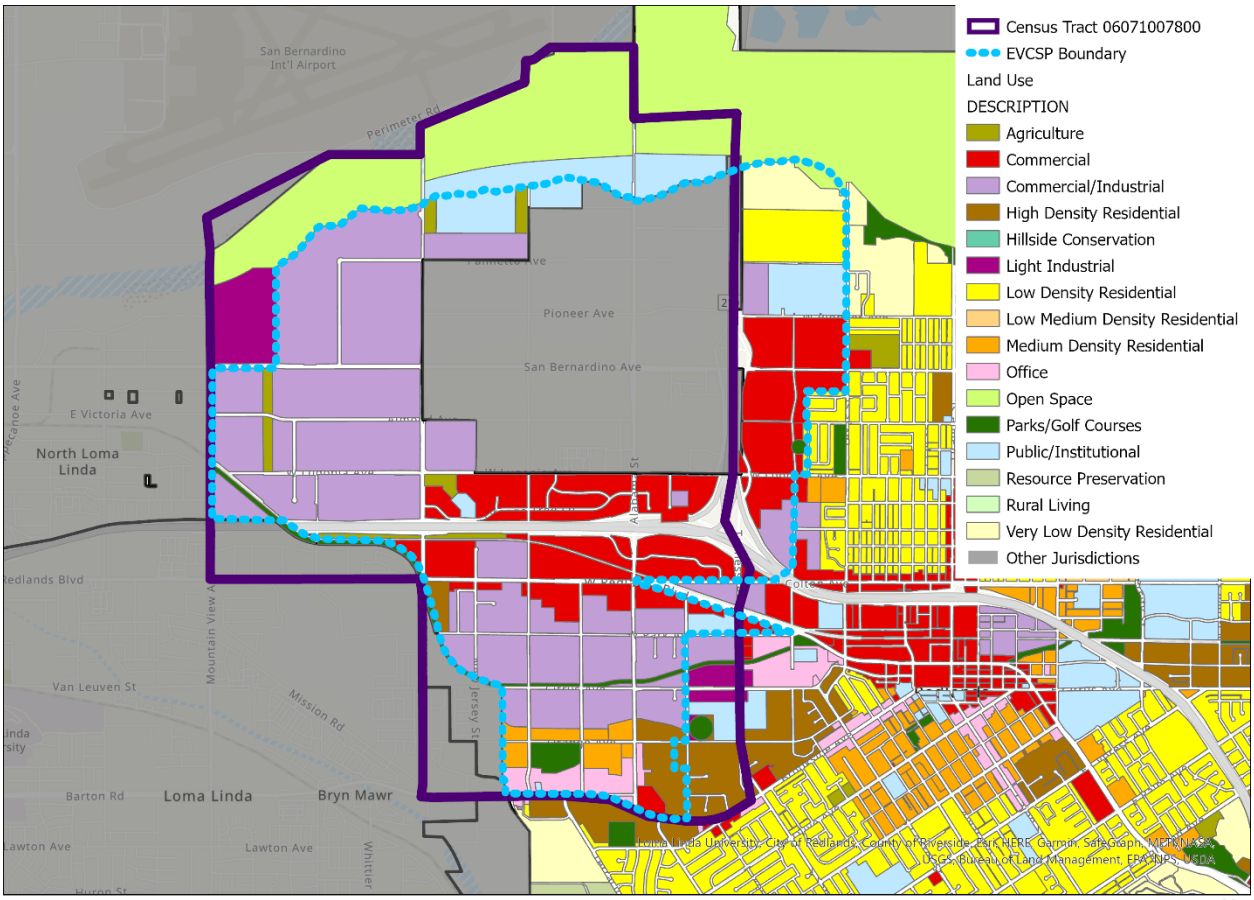
Source: American Community Survey 2019 5-Year Estimates

7.3.2.1 Northwest and Census Tract Outliers

The northwest area of the City includes three census tracts around the "donut hole" in the City. The "donut hole" is the unincorporated area surrounded by the City. This includes census tract 06071007800, which is shown in detail in Figure 7-2. This large census tract covers the northwest corner of the City that repeatedly shows up in maps as an outlier. However, this tract is fully developed for warehouse and industrial uses to the north of Interstate 10. This tract also includes the western portion of the City, on the south side of I-10, where there are existing non-conforming single-family residences, several apartment complexes, townhomes, and small lot subdivisions. As there is little to no housing in significant portions of this census tract, mapped data may be skewed.

The EVCSP consists of a large portion of this census tract and portions of the ones to the east. RHNA sites identified in this area are within the EVSCP. The sites are largely vacant, underutilized, or agricultural uses which are candidates for rezoning to accommodate capacity for low and moderate income sites. Sites in the EVCSP were selected due to their location near to regional job centers and the future Metrolink/Arrow light rail stations.

FIGURE 7-2: CENSUS TRACT 06071007800 AND THE EVCSP



Census Tract 06071007800 and the EVCSP

Source: City of Redlands

7.3.2.2 South Redlands

The southern portion of the City comprises predominantly single-family homes and a significant amount of open space. Demographically this part of the City is 21-40 percent non-white. These tracts have many large lots and a significant amount in the southerly hills. Older neighborhoods to the south of downtown are more dense than hilly neighborhoods further to the south. This area has positive TCAC scores with a high number of higher-income, married family households. There are some above moderate-income sites in South Redlands. Large portions of the area do not have access to adequate sewer and are located in a very high fire hazard zone. South Redlands has very few underutilized and appropriately sized sites that meet state criteria for lower-income, multi-family residential RHNA sites. Program 1.6-1 is included to incentivize and encourage ADU and SB 9 development within these areas.

7.3.2.3 Downtown and Central North Redlands

The downtown/central area of the City includes the University of Redlands and the area of high segregation and poverty. The tract is highly developed but has poor TCAC scores and the highest number of adults living alone with no children. This area will benefit the most from the TVSP which covers 931 aces and is shown in Figure 7-3. Sites of all income levels are included in the TVSP area. The TVSP is an opportunity to increase regional access to transit and provide transit-oriented development within the plan area. The new transit opportunities connect the region to downtown Los Angeles and with the rest of the Los Angeles metropolitan area and serve as critical smart growth opportunities. The plan will provide significant investment to the lower-resource areas in the City.

The City is already seeing developer interests in this area as a result of the rail stations nearing completion, with the following projects having been submitted:

- **Redlands Mall Redevelopment**: A proposal to redevelop the Redlands Mall site on approximately 11.15 acres with a mixed-use project that includes residential and commercial uses within five new multi-tenant buildings, to include the following:
    - Demolish existing on-site buildings and improvements.
    - Construct five mixed-use buildings up to four (4) stories high.
    - Construct up to 681 multifamily dwelling units (apartments and condominiums), to include studio, one-bedroom, two-bedroom, and three-bedroom, and live/work units ranging between 475 and 1,500 square feet each.
    - Construct a 6,000 square-foot recreational amenity building including pool.
    - Construct up to 73,000 square feet of commercial floor area on ground floors to include retail and restaurant uses, as well as a rooftop restaurant.
    - Construct up to 12,222 square feet of office space on upper floors.
    - Construct a pedestrian plaza totaling approximately 22,742 square feet on Third Street.
    - Construct a five-level aboveground parking structure with 780 spaces.
    - Construct two subterranean parking garages.
    - Construct public and private open space areas to include landscaping, shade trees, street trees, and pedestrian improvements; and
    - Construct related site improvements to include sidewalks, driveways, landscape, lighting and streetlights, storm drains, flood prevention features, and public and private utility connections.

- **The Grand Apartments:** A proposal to:
    - Merge 14 existing parcels into one parcel, approximately 1.48 acres in size.
    - Construct a 149-unit multi-family apartment complex, with 25,964 square feet of common open space area.
    - Amendment to the existing Specific Plan to allow for height averaging, when determining the maximum building height, and amend the parking requirement for multi-family residential uses to 1 space per unit and 1 guest space for every 4 units.

- **City Center Apartments**: The project is a proposal to construct a mixed-use development consisting of a 138-unit apartment complex and three restaurant buildings. All three restaurant pads are approximately 3,500 square feet in area and located in the southeast corner of the

property. As proposed the apartments are four stories tall and constructed over two floors of parking. One floor of parking is below the ground surface.

In addition to the above proposed residential projects, the City has realized significant commercial and quality of life investments in the area surrounding the downtown rail station. The following projects have either been recently constructed, are under construction, or have received entitlement approval:

- **Redlands Food Hall:** The rehabilitation and adaptive reuse of the Mutual Orange Company Packing Plant to establish a multi-tenant food hall including food retail, farmer's market, restaurants, demonstration kitchen, and similar retail uses.

- **Escape Craft Brewery:** The rehabilitation and adaptive reuse of the City Transfer and Storage Company Warehouse to establish a locally owned and operated craft brewery and restaurant.

- **J. Riley Distillery**: The construction of a new restaurant building and adaptive reuse of a former auto repair shop into a distillery to house a locally owned and operated distiller.

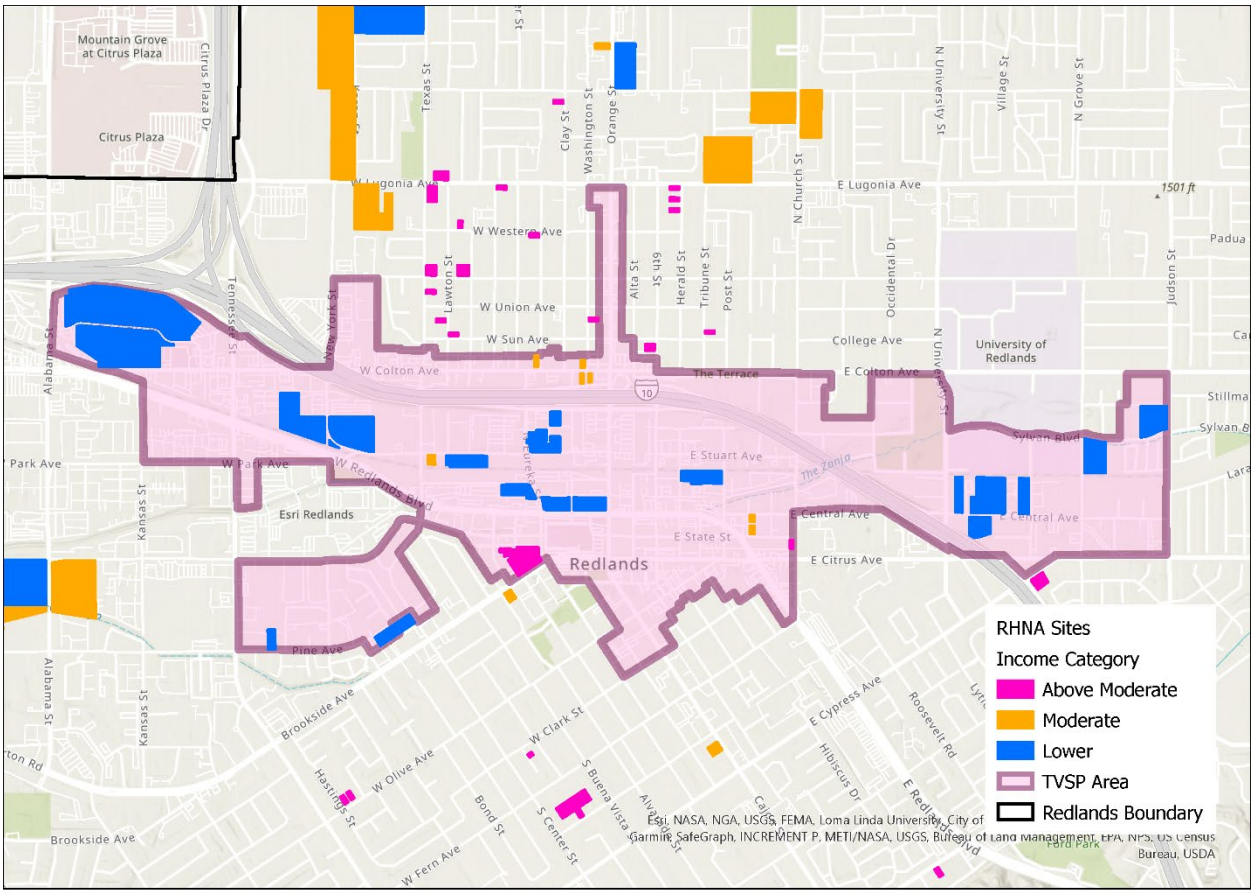
- **Redlands Garage:** The construction of a four-deck parking garage to service the Metrolink platform and nearby businesses. The parking garage includes a ground floor retail component, public art installations, common open space, and electric vehicle charging.

- **3rd Street North Retail Building:** Construction of a three-story retail/office building adjacent to the rail line and Redlands Garage. The building is connected to the garage by two pedestrian bridges on the second and third floors.

- **Santa Fe Depot and Old Chamber of Commerce Buildings:** The restoration of the Santa Fe Depot as the Arrow light rail downtown station. The adjacent Old Chamber of Commerce building is undergoing adaptive reuse as a food retail concept with outdoor common open space.

- **3rd Street South Retail Buildings**: Construction of two single-story retail buildings adjacent to the rail line and the Santa Fe Depot as part of a transit-oriented development concept.

FIGURE 7-3: TVSP AND RHNA SITES



Source: City of Redlands

7.3.2.4 Northeast Redlands

The northeast area is generally high resource and has similar trends to the south area of the City. It consists of mostly single-family homes that are slightly denser than the southern region, with some commercial nodes along primary corridors. Program 1.6-1 is included to incentivize and encourage ADU and SB9 development within these areas. There are two moderate and two lower income sites in the southwest portion of this area. The northernmost portion of the City is open space and is constrained by the Redlands municipal airport. The area south of that contains a brand new, recently constructed subdivision, leading to increased incomes and housing prices in this area.

7.3.2.5 Findings from 2020 Regional Analysis of Impediments to Fair Housing Choice

The City of Redlands participated in the San Bernardino County Analysis of Impediments to Fair Housing Choice (AI) for program years 2020-2025. The AI provides an analysis of the regional fair housing landscape focusing on four main issues of integration and segregation, areas of poverty, access to opportunity, and

housing need. The AI process included significant public outreach across jurisdictions in San Bernardino County. As a result of the analysis, the AI identified five impediments to fair housing, their contributing factors and recommended actions to take to address them.[21] The housing impediments identified by the AI include:

- Disparate access to opportunity impacts people of color
    - Low school proficiency disproportionately impacts Black, Latino, and Native American Residents
- Insufficient affordable housing in areas of high opportunity disproportionately impacts protected classes
- Levels of residential segregation are increasing
- Community education on fair housing is a continuing need
- People with disabilities have limited housing options

7.3.3 Integration and Segregation Patterns

7.3.3.1 Race and Ethnicity

The City of Redlands has seen a growth in the overall non-White population, as the City has grown since the previous Housing Element cycle. Figure 7-4 displays the racial and ethnic groups that make up the majority of the population by census tract. Most of the City is majority White by a slim or sizable gap, with the exception of three census tracts that have a non-White Hispanic majority. As the City is 32% non-White Hispanic, this indicates a concentration of the Hispanic population in the downtown census tracts. The tracts with a slim or sizeable gap that are majority Hispanic are located in the central and northern area of the City. These areas are identified in the City's 2035 General Plan Figure 1-3: Planning Subareas as Lugonia (area east of Highway 210) and West End (area west of Highway 210).

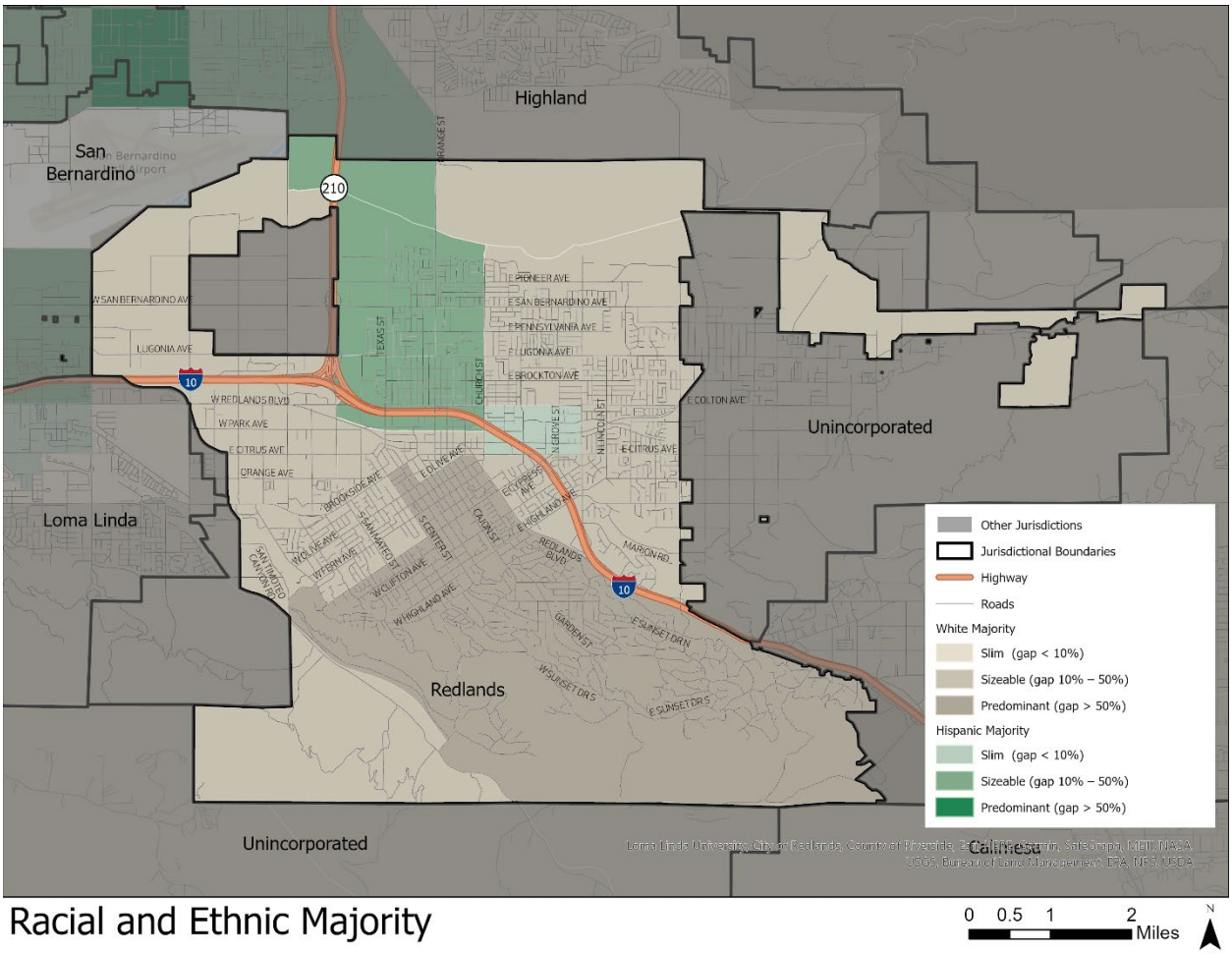
In the 1960s, the central area that is now the downtown area of Redlands had the most racial diversity. Racial covenants maintained the south and east of the City as majority White. The southeast city still has a predominant white majority.

Regionally, most of San Bernardino County's population is heavily concentrated in the southwest corner of the County. While most of the County has a majority non-Hispanic White population, the western areas of the County have a similar profile to the City of Redlands with areas that are majority non-White Hispanic population clustered among the majority White areas. The County experienced growth in the overall non-White population. The distribution of the White and Hispanic populations throughout the Inland Empire is relatively even, while the High Desert and Morongo Basin have a larger White population. Redlands has a slightly lower non-White Hispanic population than the County, at 32 percent and 42 percent respectively. The AI found that changes in racial and ethnic composition across the County since 1990

[21] San Bernardino County Analysis of Impediments to Fair Housing Choice. Pg. 150.

have resulted in a more diverse but less integrated population countywide.[22] The areas with the sizeable Hispanic population also have the most housing choice voucher use and a lower environmental opportunity score. Alternatively, predominantly white areas have higher incomes, education opportunity scores, and economic opportunity scores.

FIGURE 7-4: RACIAL AND ETHNIC MAJORITY, 2010, REDLANDS



Source: HCD AFFH Mapping Tool.

Figure 7-5 shows the RHNA sites and the percentage of each census block group that is non-White. The figure shows that the minority populations have increased over time. There is no specific block group that saw a disproportionate increase in minority populations compared to others. The northern and western areas see higher concentrations of minorities than the eastern and southern parts of the City.

Trends in Redlands align with regional trends in San Bernardino County of increases in non-White populations. The 2020 San Bernardino County Analysis of Impediments to Fair Housing Choice reports

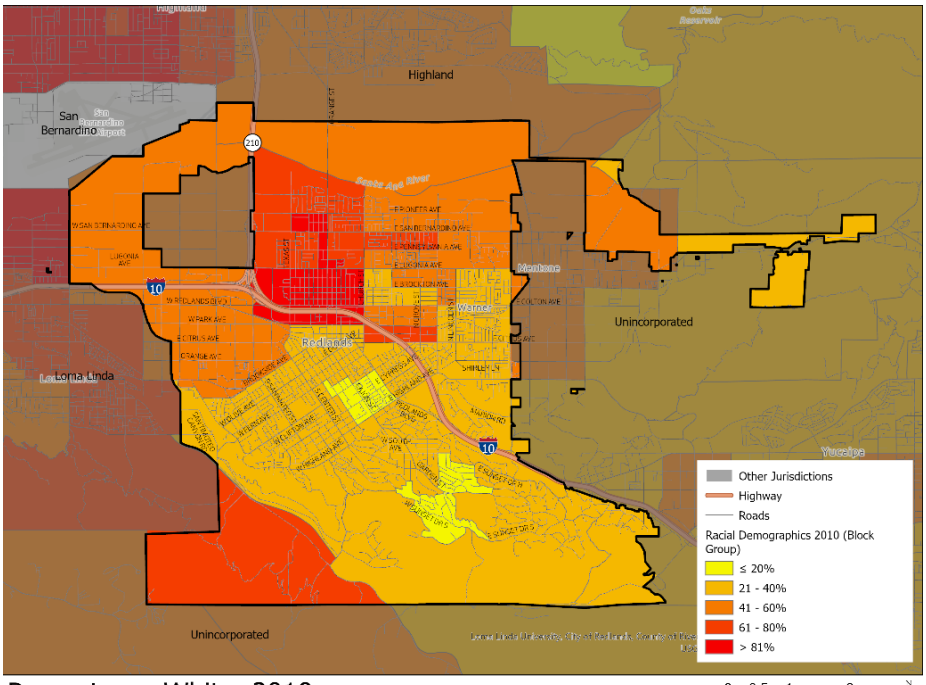
[22] San Bernardino County Analysis of Impediments to Fair Housing Choice, pg. 36: http://www.sbcounty.gov/uploads/cdh/reports/SanBernardinoCountyAI_Final_0410%20with%20Appendix.pdf.

that the Hispanic population in the County increased in population share by 20 percent in the last two decades.[23]

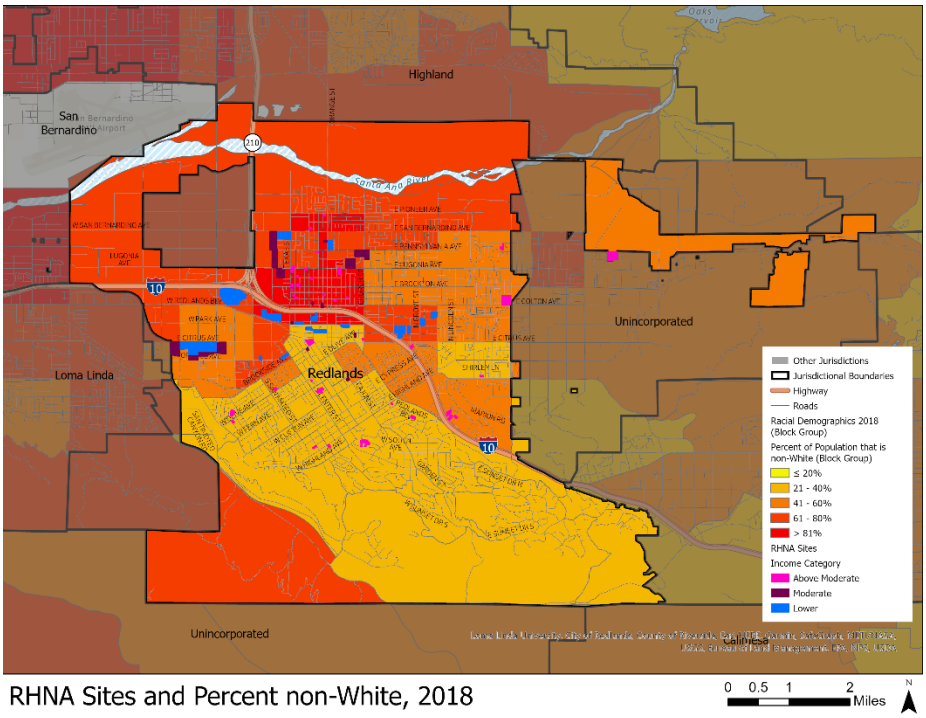
RHNA sites are spread throughout the City and there are sites of each income level in areas with a higher minority concentration. The sites are focused in areas with the capacity and potential for growth.

[23] San Bernardino County Analysis of Impediments to Fair Housing Choice: http://www.sbcounty.gov/uploads/cdh/reports/SanBernardinoCountyAI_Final_0410%20with%20Appendix.pdf.

FIGURE 7-5: RHNA SITES AND NON-WHITE POPULATION (2010 AND 2018)



Percent non-White, 2010

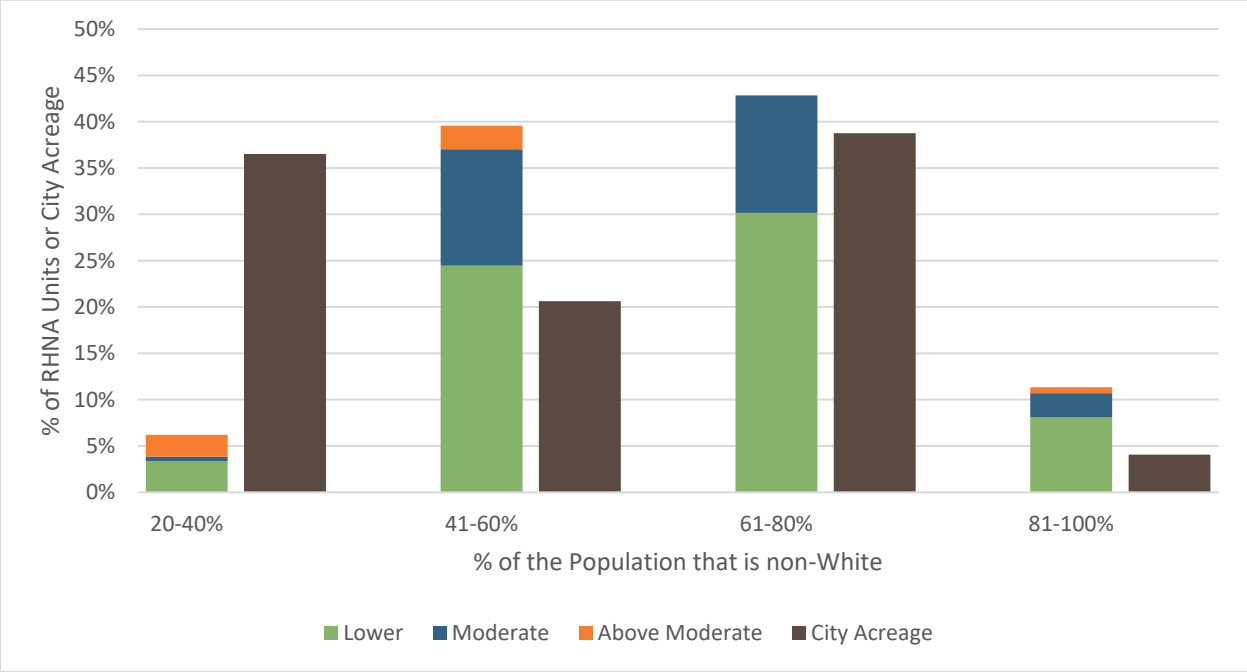


RHNA Sites and Percent non-White, 2018

Source: HCD AFFH Mapping Tool.

The accompanying chart in Figure 7-6 displays the comparison of RHNA units by income level and the total City acreage that is in each quartile. The sites are generally dispersed by income level across categories. The lower income sites are not concentrated in any one category. About 80 percent of RHNA units are in areas where there are 40–80 percent non-White populations. Currently, Redlands is 72 percent White and 32.7 percent Hispanic. While there is a disparity between sites and acreage in areas with 20-40 percent non-White population, large portions of this land are open space and not suitable for future development, including the 200-acre San Timoteo Nature Sanctuary and Herngt 'Aki' Preserve.

FIGURE 7-6: RHNA UNITS BY INCOME AND CITY ACREAGE COMPARISON BY NON-WHITE POPULATION



Source: HCD AFFH Mapping Tool and City of Redlands

One metric used to quantify segregation is the dissimilarity index. The dissimilarity index measures the distribution of two groups in a city and assigns a score between 1-100. Level of segregation is determined by assessing what percentage of residents of a census block would have to move for each block to have the exact same population of said group. The City's goal is a low dissimilarity index which indicates high integration. The formula for this calculation is provided by HCD's AFFH Guidance Document.[24]

The categories for a dissimilarity index (shown as percentages) as defined by HCD are as follows:

- < 30: Low Segregation
- 30-60: Moderate Segregation
- > 60: High Segregation

[24] AFFH Guidance for All Public Entities, pg. 67

Table 7-2 shows the dissimilarity index between the White, non-Hispanic population and various minority populations in the City in 2013 and 2019. The table indicates that the dissimilarity index is decreasing or static over time except for the index for the Black, non-Hispanic and White non-Hispanic groups. This decrease in the segregation index for other populations is likely in part due to the increasing Hispanic population in the City. The index for the Non-White, non-Hispanic and Hispanic/White, non-Hispanic populations is 35. This is slightly lower than the index for San Bernardino County, which is at 40.

TABLE 7-2: DISSIMILARITY INDEX, RACE, 2013 AND 2019

Group 1 / Group 2	2013	2019
Non-White/White	39	35
Hispanic/White	43	39
Black/White	53	58
Asian /White	45	45

Source: American Community Survey 2013 and 2019 5-Year Estimates (B03002).

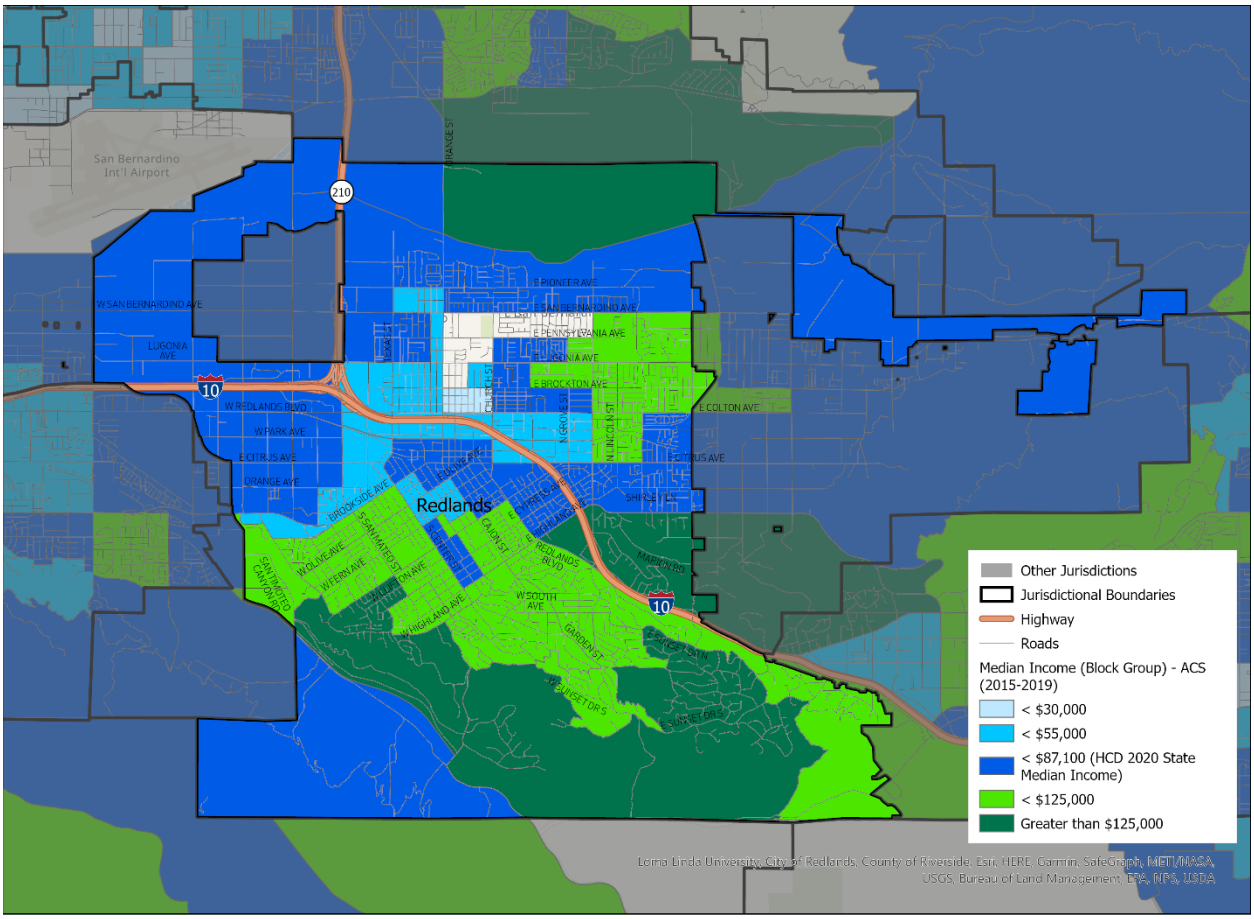
When comparing the Hispanic and White populations using the dissimilarity index, the result is a score of 39 in 2019, which is a moderate level of segregation. This result is explained by the existence of the high segregation and poverty neighborhood with a sizeable Hispanic majority in the northern area, as shown in Figure 7-4. The sizeable Hispanic majority area continues beyond the City boundary into the area surrounding the San Bernardino Airport.

The indexes of dissimilarity for Black and White populations and Asian and White populations are 58 and 45, respectively. This equates to an upper moderate level of segregation between Black and White populations and a moderate level of segregation between the Asian and White populations. Redlands' Black and Asian populations respectively only make up 5.4 percent and 8 percent of the total population.

7.3.3.2 Income

In 2019, the median income in the City of Redlands was $74,839. In 2019, the median income in San Bernardino County was $63,362. While the median income for the City trends similarly to the County, the higher-income southern tracts of Redlands skew the median income slightly higher than in the surrounding region.

FIGURE 7-7: MEDIAN INCOME, 2015 - 2019



Median Income, Block Group, 2015 - 2019

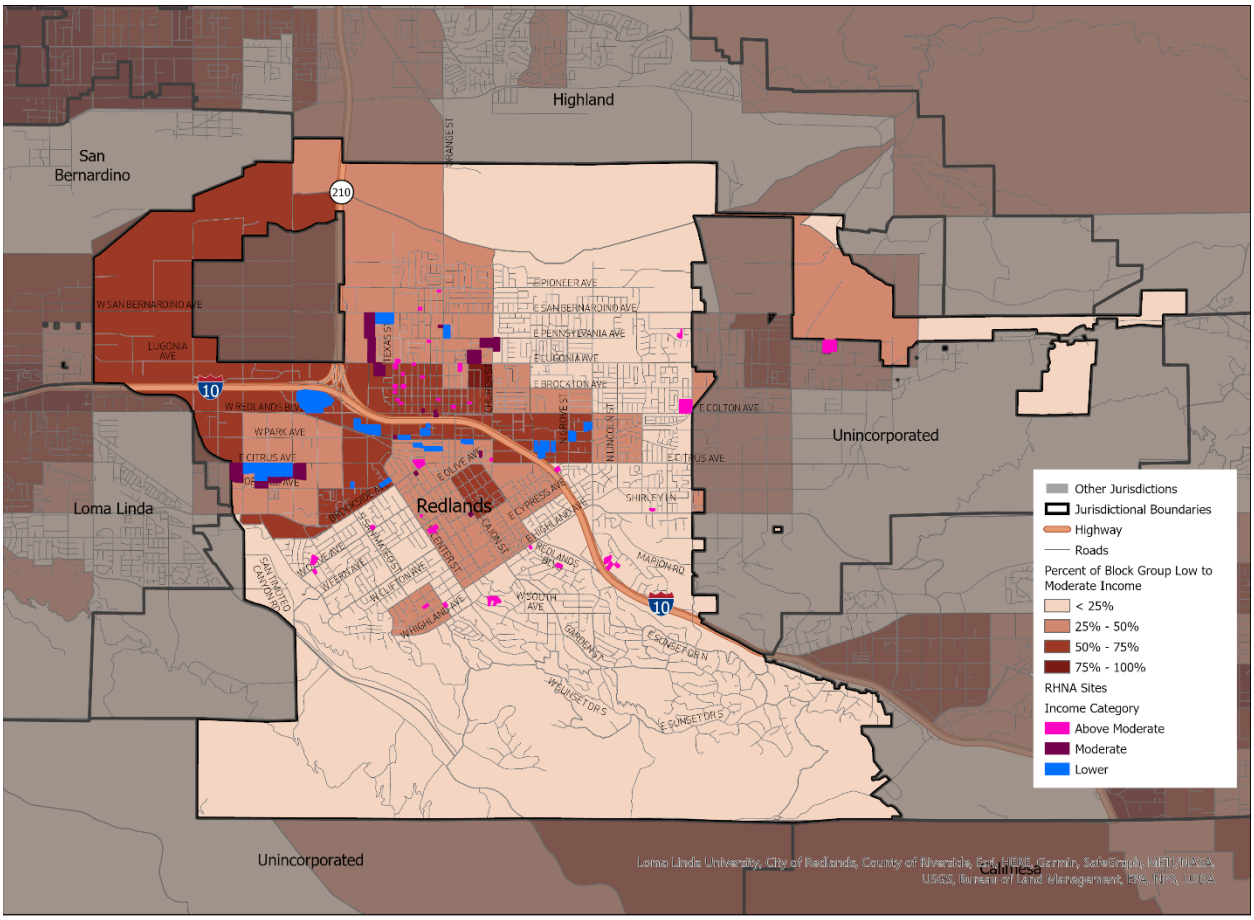
Figure 7-8 displays the RHNA sites by their income level and the percentage of residents in each census block group that falls into the low- and moderate-income category. The areas with the highest populations of low to moderate income have a variety of sites in each income category. The income groups in the City of Redlands are relatively segregated, with the lowest percentage of low- to moderate-income located in the southeast swath of the City, where there is a country club/ golf course, and high number of single-family homes. The sizes of homes and lot sizes in the south region tend to be larger than those in the north/east and downtown/central regions of the City, and the cost of housing in the south region tends to be higher compared to the north/east and downtown/central regions. The south region is also the same area that has a predominant White majority.

The area with the highest percentage of the population in the low- to moderate-income range is the census tract in the northwest corner (this tract is discussed in Section 7.3.2 as an outlier), where there are also a number of agricultural jobs supporting Redlands' citrus industry, however, it is important to note there are nearly no housing units in the area north and west the "donut hole" (unincorporated County pocket). There is some housing south of the donut hole, the only area in this tract zoned for residential use is south of I-10 on the western edge of the City.

The westernmost part of this upper corner has a slim White majority, but in the more central edge of the northwest corner the map shows an area of high segregation and poverty, where 50-75% of the population is in the low- to moderate-income range. This area's income demographic is comparable to other areas in the City of San Bernardino, especially around the airport, but is ultimately relatively isolated compared to its surroundings. The area around the donut hole is almost exclusively industrial or commercial, with very few people living there. Therefore, the area surrounding the donut hole does not have a concentration of people as the map suggests.

The accompanying chart in Figure 7-9 displays the percentage of RHNA units by income level compared to the City acreage by block group of the percentage that is low to moderate income. The low- and moderate-income units are largely divided between the 25–50 percent and 51–75 percent categories. Many of the areas shown as < 25% low-moderate income are within the very high fire hazard severity zone or constrained by the Redlands Regional Airport. Over 60 percent of RHNA units are in areas where 25–50 percent of the population is low to moderate income.

FIGURE 7-8: RHNA SITES AND LOW-MODERATE INCOME POPULATION (2011-2015)



Source: HCD AFFH Mapping Tool.

FIGURE 7-9: RHNA UNITS AND CITY ACREAGE BY BLOCK GROUP COMPARISON BY LOW TO MODERATE INCOME

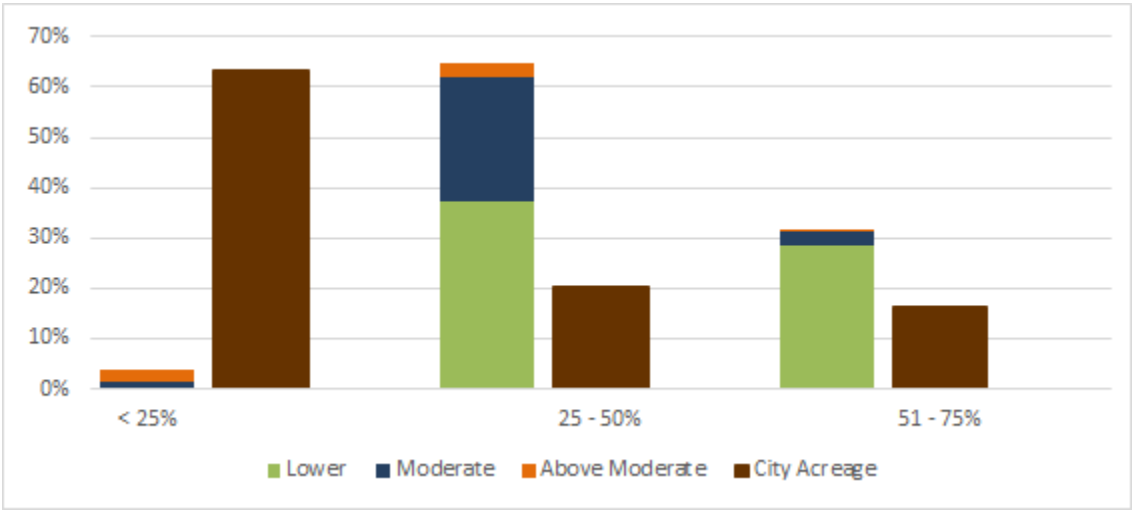
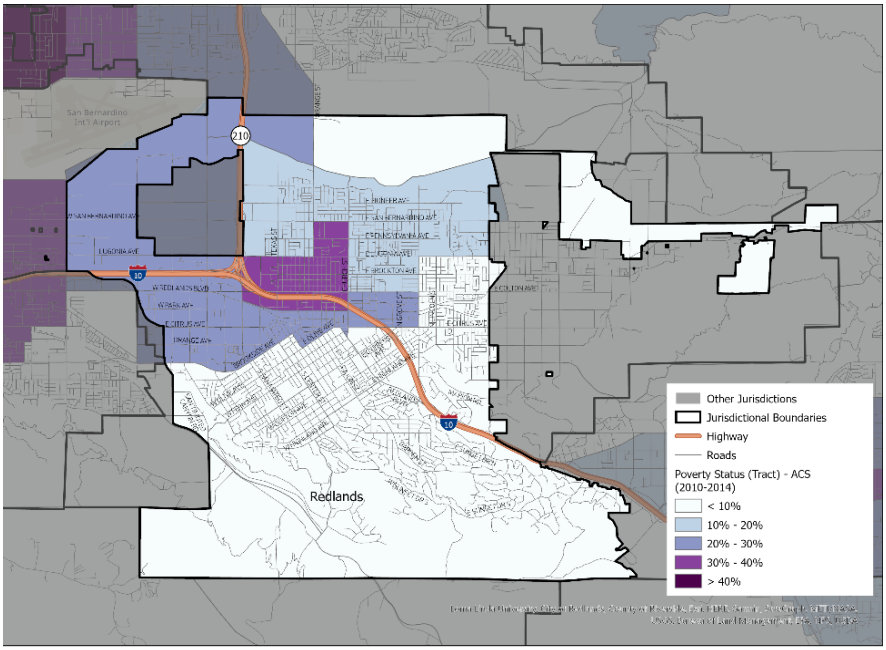


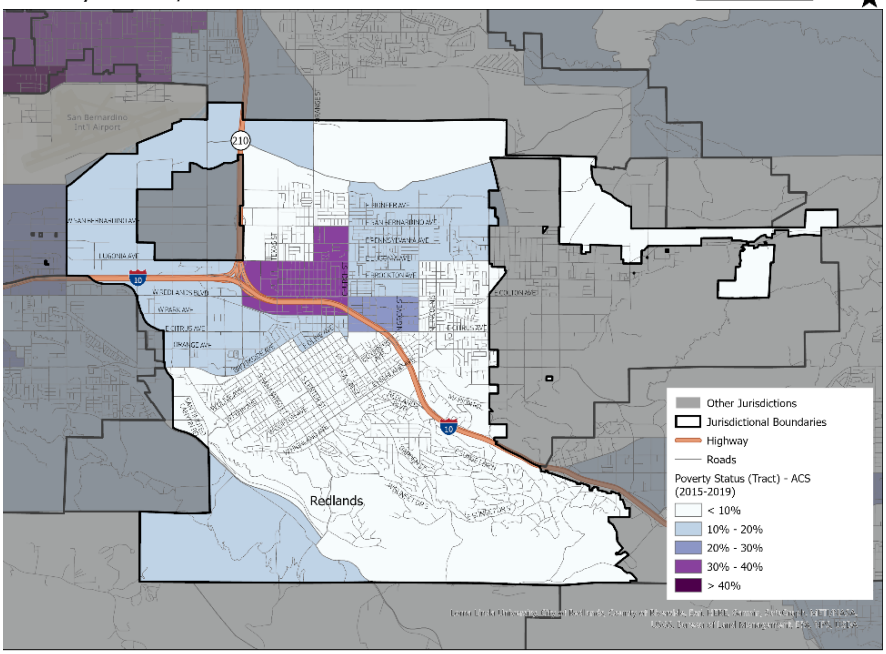
Figure 7-10 displays the percentage of households whose incomes are under the federal poverty level in each census tract from 2010-2014 and 2015-2019. Redlands has low levels of poverty throughout the City except in the central census tract, which has poverty levels from 30 percent to 40 percent. In San Bernardino County, 13.3 percent of the population is below the poverty line. The change over time shows that poverty in the western and north-central census tracts has decreased, while the rest of the City mostly stayed in the same category. Using the dissimilarity index to compare low- to moderate-level incomes with above-moderate incomes in the City yields a result of 41. This level of segregation is likely due to the divide between the southern and northern halves of the City. The southern half of the City has a high-income population with less than 25 percent of residents falling in the low- to moderate-income category. This area also contains hillside preservation areas and other conserved open space and single-family homes. The northern half of the City varies in income level, with some downtown areas reaching 50 to 75 percent of the population being in the low- to moderate-income category. This area surrounds downtown and the university. The difference in demographics between the north and south contributes to the income dissimilarity index of 41. This indicates a moderate level of segregation among high- and low-income levels in Redlands. The dissimilarity index comparing low- to moderate-income with above-moderate income in the County yields 21.7, indicating a low segregation of incomes and revealing Redlands' higher levels of income segregation compared to the region as a whole. The presence of the University of Redlands likely provides an explanation for much of the lower-income clustering in these tracts. Many university students are not employed full time or are employed in lower-paying jobs; the high concentration of university students is a reason that these tracts have more low-moderate households. Additionally, areas around the university have a zoning designation of R-1-D (Single Family Residential). This designation permits lots of a certain depth to have two primary residences; however, because of lot configuration, these units tend to be smaller than typical primary residences.

While increasing lower-income housing in the southern areas of the City would lower the dissimilarity index, the southern, suburban area of the City is not the most accessible place for low income or affordable housing to be. There is a lack of transit in this area, and the suburban neighborhoods make the development of low-income housing difficult and expensive.

FIGURE 7-10: POVERTY STATUS, 2010-2014 AND 2015-2019



Poverty Status, 2010-2014



Poverty Status, 2015-2019

Source: HCD AFFH Mapping Tool.

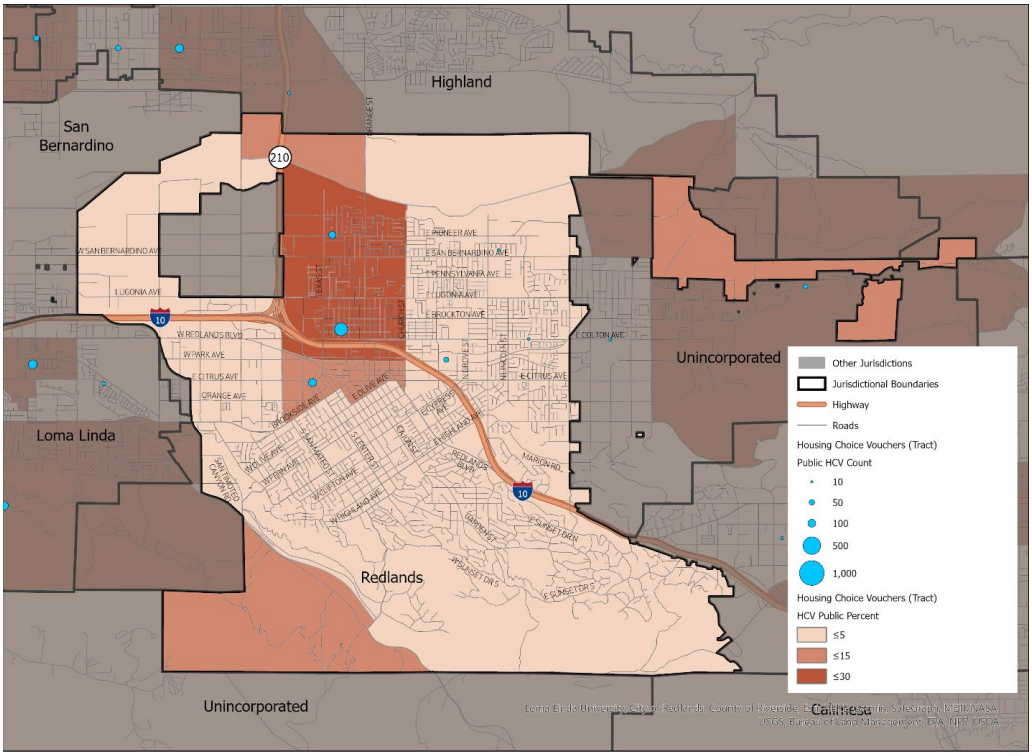
The housing choice voucher program is the federal program for assisting very low-income, elderly, and disabled families and individuals in affording decent housing by subsidizing rent costs and paying landlords directly for a portion of the rent. Eligibility is based on family size and whether income is less than 50 percent of the area's median income.

Figure 7-11 reveals trends in where housing choice voucher recipients reside in the City of Redlands. The map reveals a concentration of housing choice voucher users north of downtown above I-10 with some use downtown and in the area of high segregation and poverty.

Housing choice vouchers make up a higher percentage of rental units in these areas as well, in addition to some presence in the southwest corner of the City. Higher use of vouchers in these areas is due to the availability of appropriate housing types like affordable rental units maintained by private owners. There are three housing developments partially managed by the Housing Authority of San Bernardino County that are located north of I-10: Redlands Housing Community, Vista Del Sol, and Valencia Grove. This relative concentration may explain the increased prevalence of housing choice voucher use in central Redlands.

The areas with little to no identified use of housing choice vouchers are predominantly single-family homes. Countywide, similar trends are found where denser areas have more rental units and more housing choice voucher recipients.

FIGURE 7-11: LOCATION OF HOUSING CHOICE VOUCHERS, 2010, REDLANDS

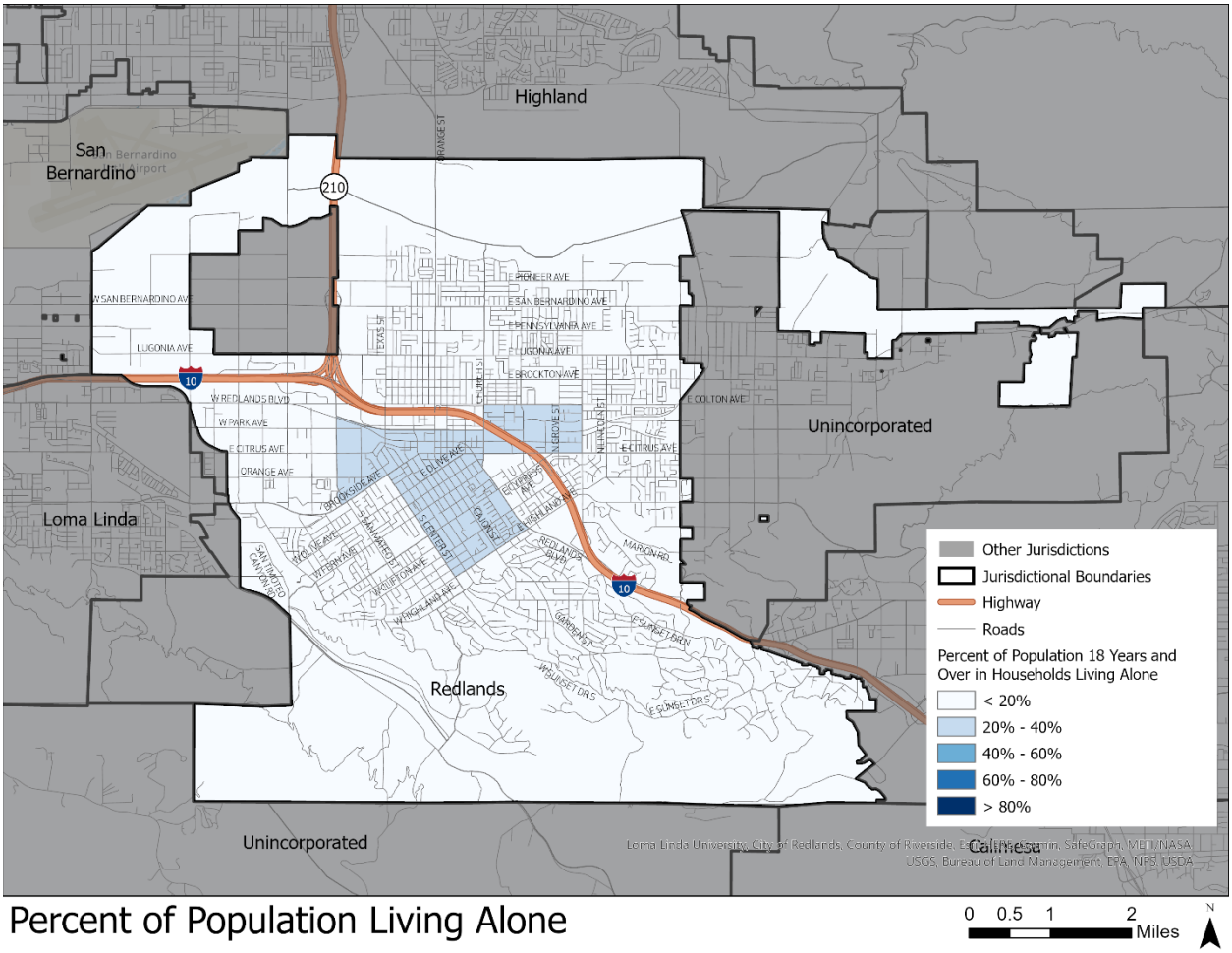


7.3.3.3 Familial Status

In a large majority of the City, less than 20 percent of the adult population lives alone, except in the downtown City center hub as well as the University of Redlands, where students may be living in atypical housing, and where 20–40 percent of adults live alone, as shown in Figure 7-12. Regional trends indicate

similar levels of the population living alone across neighboring jurisdictions and the entirety of San Bernardino County.

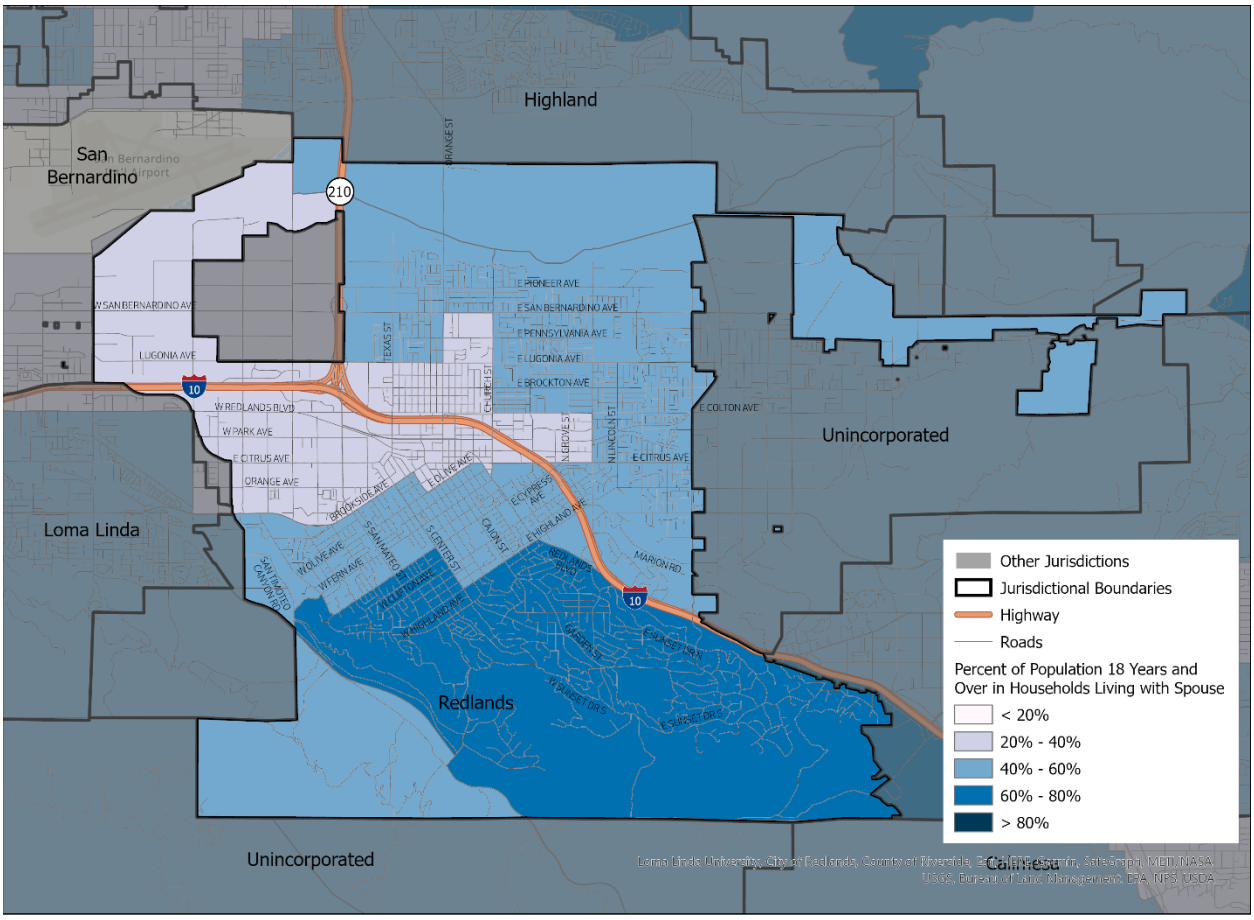
FIGURE 7-12: PERCENTAGE OF ADULTS LIVING ALONE, 2015-2019 REDLANDS



Source: HCD AFFH Mapping Tool.

The area where a larger percentage of the population lives alone is also, as expected, the area where the lowest percentage of adult residents lives with a spouse, as shown in Figure 7-13.

FIGURE 7-13: PERCENTAGE OF ADULTS LIVING WITH SPOUSE, 2015-2019, REDLANDS



Source: HCD AFFH Mapping Tool.

The area with the highest percentage of the population living with a spouse corresponds with the wealthiest corner of the City, the southeast corner. There are also more children living with married couples in that southeast portion of the City, as shown in Figure 7-14. This area is farther from downtown, is lower density, and features mostly single-family residential homes.

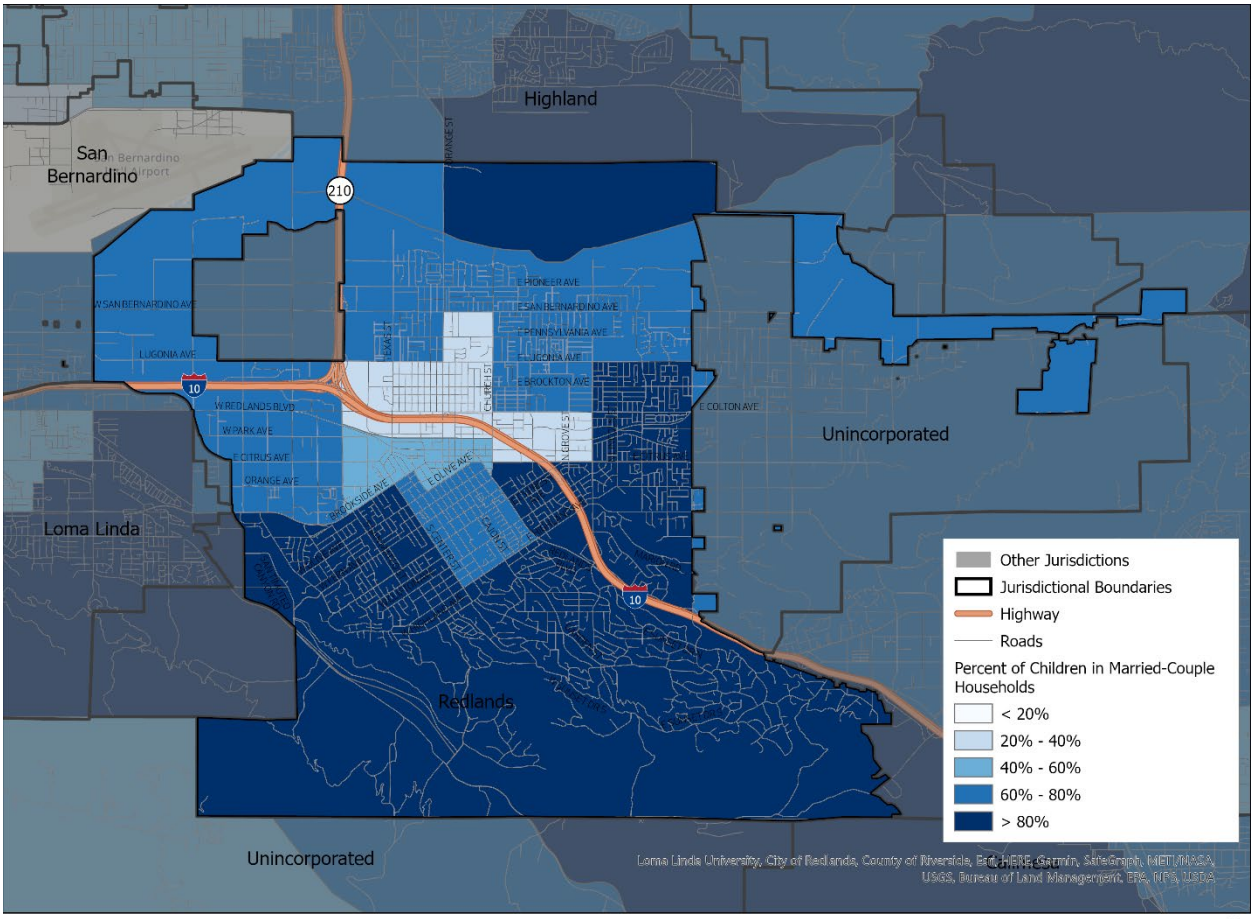
Compared to the region as a whole, the majority of the City matches trends in surrounding cities where in the majority of the area about 40–60 percent of adults live with a spouse, with some sparse neighborhoods where under 40 percent live with a spouse. The southeast portion of Redlands stands out in this regard—at over 60 percent of adults living with a spouse, it is comparatively high.

Figure 7-14 displays the percentage of children that are living in married couple households in each census tract. The area with the highest percentage of children in married-couple households correlates with the highest percentage of spouses living in the same household. The areas surrounding the university and downtown have few individuals under 18 years of age, just as they had a low number of spouses living together and a high number of people living alone. The discrepancy in the trends that these data sets

reveal is that the northwest corner of the City has a low percentage of spouses living together, but a higher percentage of spouses with children that live together, as shown by Figure 7-14. This means that spouses living together in other areas are less likely to have children than those spouse couples in the northwest corner. Although there are few spouses living together in the northwest corner, the few that do are highly likely to be living with children.

Regionally, trends shown in Figure 7-14 continue beyond the bounds of the City, with Loma Linda and Highland having the highest percentage of children in married couple households, matching the adjacent areas of Redlands.

FIGURE 7-14: PERCENTAGE OF CHILDREN IN MARRIED-COUPLE HOUSEHOLDS, 2015-2019, REDLANDS

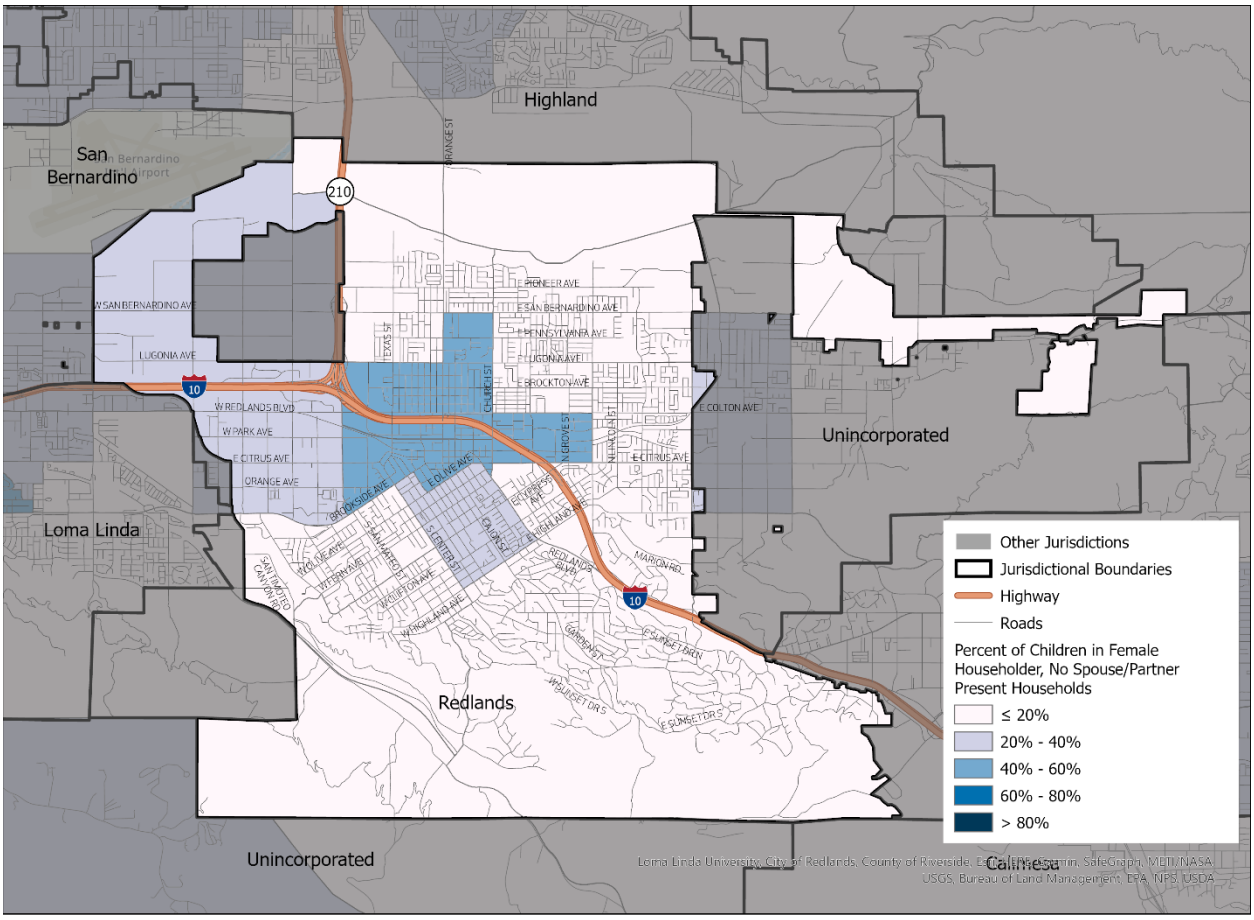


Children in Married Couple Households

Source: HCD AFFH Mapping Tool.

Throughout the City, there are very few female-headed households with children, as revealed by Figure 7-15. Exceptions include the central portion of the City which sees from 40 percent to 60 percent of children in female-headed households and one tract just below the central tracts (06071008002). There are two census tracts with 20–40 percent of children in female-headed households.

FIGURE 7-15: PERCENTAGE OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS, 2015-2019, REDLANDS



Source: HCD AFFH Mapping Tool.

7.3.3.4 Persons with Disabilities

The US Census defines a person with disabilities as someone who reports as having a hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty. Approximately 12 percent of the population in the City of Redlands has a disability, and 48 percent of the disabled population has an ambulatory, or walking, difficulty.

Compared to other characteristics of disabilities, such as a hearing or vision difficulty, a walking difficulty can pose a need for specialized housing, such as a single-story unit or immediate adjacency to transit—a need that may increase with a larger population. Additional adaptations, depending on level of mobility, may include wheelchair access, larger homes for live-in help, or proximity to health facilities.

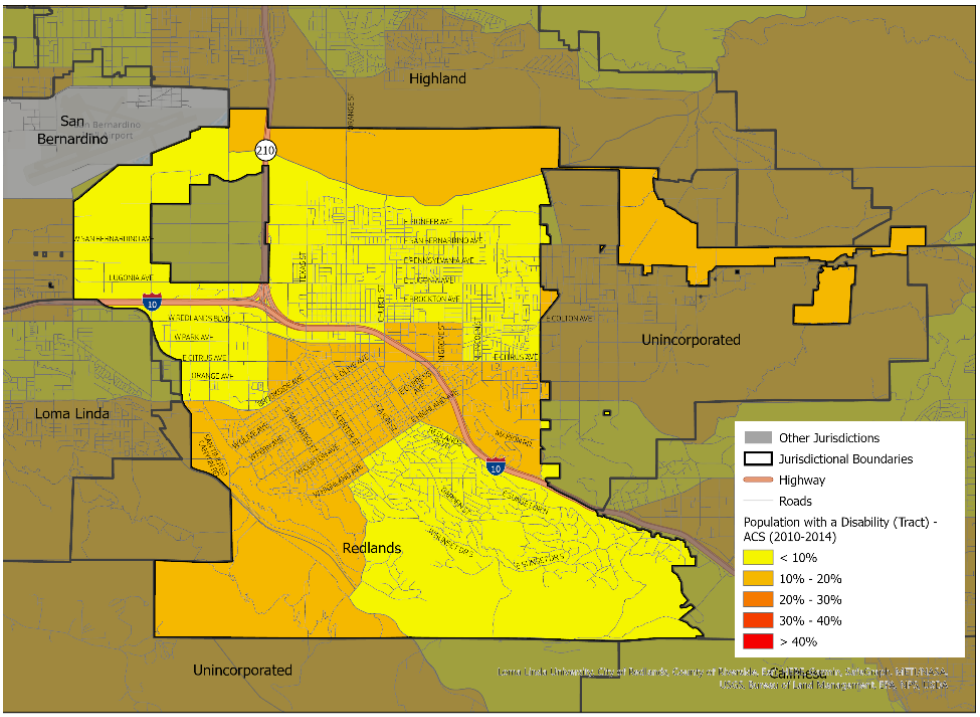
TABLE 7-3: DISABILITY CHARACTERISTICS

Characteristic	2010	2019	% Change
Persons with Disability	7,184	8,235	15%
Percentage of Population with Disability	10.49	11.66	
Disability Type by Age Group:			
Hearing Difficulty	2,018	2,623	30%
Under 18 Years	113	97	-14%
18 to 64 Years	523	757	45%
65 Years and Older	1,382	1,769	28%
Vision Difficulty	1,453	1,046	-28%
Under 18 Years	164	28	-83%
18 to 64 Years	606	684	13%
65 Years and Older	683	334	-51%
Cognitive Disability	2,579	3,529	37%
Under 18 Years	360	429	19%
18 to 64 Years	1,385	1,994	44%
65 Years and Older	834	1,106	33%
Ambulatory Difficulty	3,684	3,924	7%
Under 18 Years	88	38	-57%
18 to 64 Years	1,570	1,586	1%
65 Years and Older	2,026	2,300	14%
Self-Care Difficulty	1,454	1,736	19%
Under 18 Years	109	152	39%
18 to 64 Years	617	690	12%
65 Years and Older	728	894	23%
Independent Living Difficulty	2,987	3,508	17%
Under 18 Years	-	-	-
18 to 64 Years	1,367	1,815	33%
65 Years and Older	1,620	1,693	5%

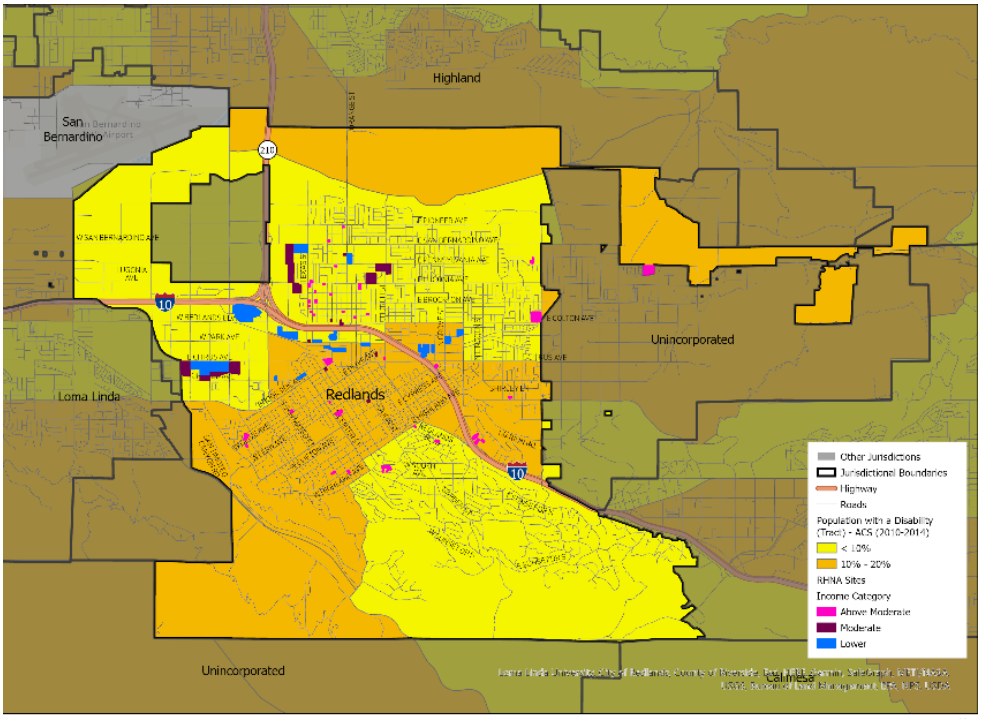
Source: American Community Survey 2010 and 2019 5-Year Estimates.

An equitable distribution of health-oriented community facilities and services, including recreation centers, medical facilities, and youth centers, helps ensure the well-being of residents. Figure 7-16 shows the RHNA sites and a relatively equal distribution across the City of individuals with disabilities.

FIGURE 7-16: RHNA SITE DISTRIBUTION AND POPULATION WITH A DISABILITY (2015-2019)



Population with a Disability, 2010-2014



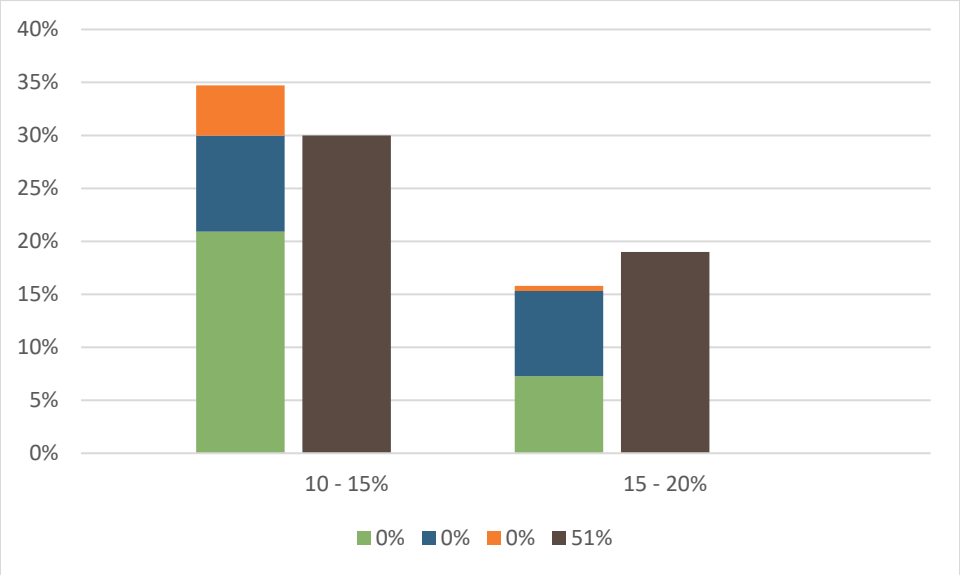
RHNA Sites and Population with a Disability, 2015 - 2019

Source: HCD AFFH Mapping Tool.

Redlands is home to, or adjacent to, numerous care facilities including Redlands Community Hospital, Kaiser Permanente, Beaver Medical Group, and Loma Linda University Behavioral Medical Center, and these health care facilities are well distributed throughout the City. Overall, Redlands is well served by healthcare facilities, and there are no major clusters of the City without access to care.

The accompanying chart in Figure 7-17 displays the breakdown comparison of RHNA units and the City acreage among the percentage of the population with a disability. There is no census tract with greater than 20 percent of the population having a disability. RHNA sites of all income levels are spread throughout the City. Sites are not overly concentrated in areas that have either high or low percentages of the population with a disability.

FIGURE 7-17: RHNA UNITS BY INCOME AND CITY COMPARISON BY DISABILITY STATUS



Source: HCD AFFH Mapping Tool and City of Redlands.

7.3.3.5 Findings

Overall, there are clear geographic patterns emerging, as evidenced in the university, downtown, and the southeast portions of the City. The university and downtown areas have substantial numbers of unmarried, childless people, living alone with lower incomes which is consistent with the existing land uses of the University of Redlands and older single- and multifamily housing stock in these areas. This central area also has a predominantly Hispanic population. In comparison, the southeast section of the City is a wealthy, mostly White, single-family area, consisting primarily of married couples with children. Existing land uses in this area consist primarily of post 1950s single-family dwellings on larger lots and in higher elevations (foothills). These trends of wealth, race, and marital status are not unique to the City and persist throughout the San Bernardino County region as discussed in the AI.

Contributing factors to fair housing issues pertaining to segregation patterns include the concentration of minority populations downtown, the concentration of available and appropriate housing for housing

choice vouchers, and the north/south segregation by race and income. These factors will be addressed by the City with actions such as those outlined in Programs 1.5-1, 1.1-3, 1.2-14, 1.5-8, 1.5-10, and 1.3-2:

- Placed Base Improvements
- Transit Villages Specific Plan
- Waive preapplication fee for affordable housing projects
- Residential Development in High Opportunity Areas NOFA/Nonprofit Housing Development
- Inclusionary Housing Ordinance

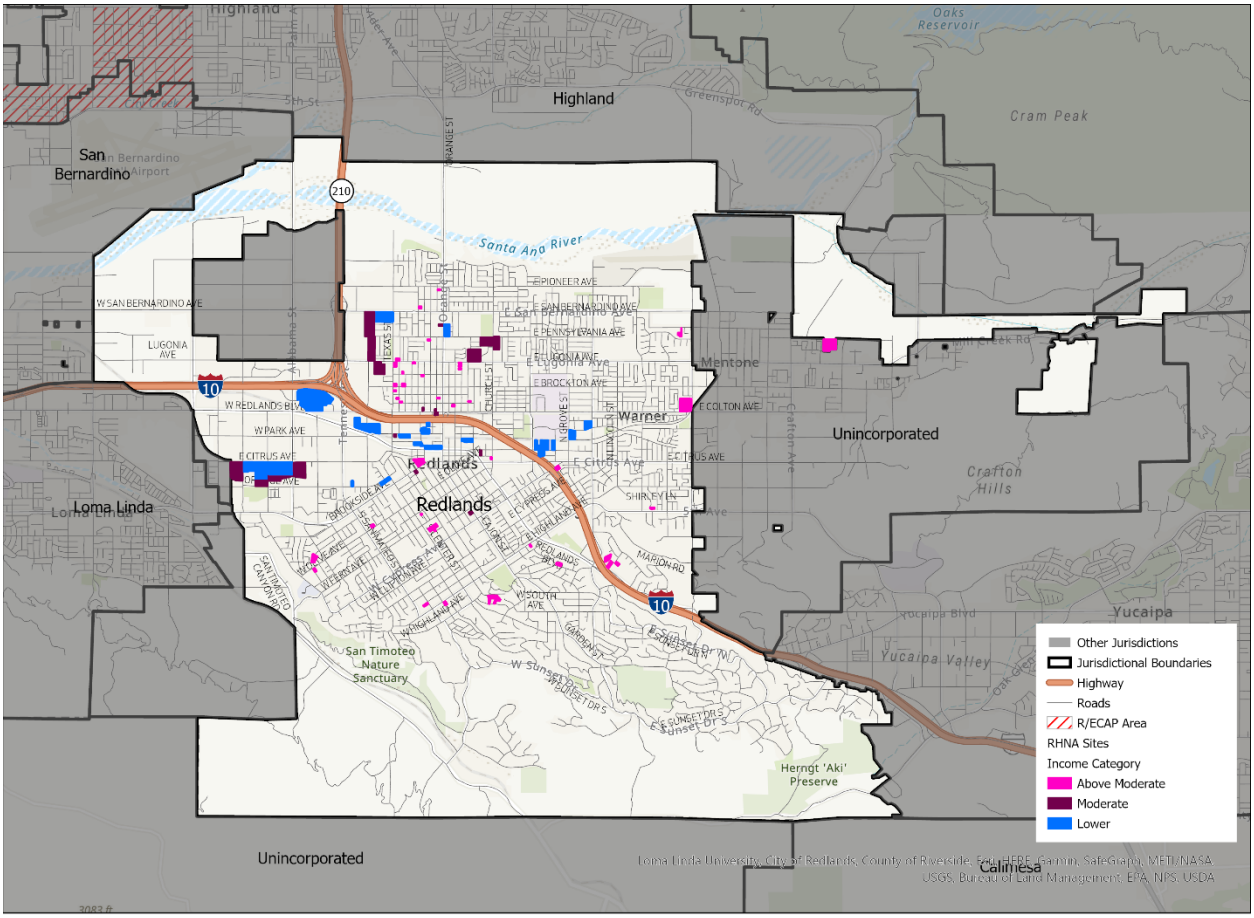
7.3.4 Racially & Ethnically Concentrated Areas of Poverty and Racially Concentrated Areas of Affluence

HUD defines a Racially and Ethnically Concentrated Area of Poverty (R/ECAP) as an area where the percentage of the population that is non-White is over 50 percent and the percentage of median household incomes below the poverty line is over 40 percent. R/ECAPs are often the focus of fair housing policy, but Racially Concentrated Areas of Affluence (RCAA) must be considered as well when attempting to eliminate areas of segregation. Overall, in the City of Redlands, the percentage of the population that is White is trending downward while the median household income is trending up. There are no R/ECAPs or RCAAs in Redlands. The sites inventory will not contribute to the creation of a R/ECAP.

Figure 7-18 shows the RHNA sites in the City and R/ECAPs in the vicinity of the City of Redlands. There are 19 R/ECAPS in San Bernardino County, most of which are located in the City of San Bernardino. There are no R/ECAPs in the City of Redlands. The nearest R/ECAP is northwest of Redlands in the City of San Bernardino, where there are some disparities in access to opportunities. The remaining R/ECAPs are in Barstow, Colton, Grand Terrace, Adelanto, and El Mirage.

Although there are no R/ECAPs, the City of Redlands does have an area of high segregation and poverty per the TCAC opportunity composite scores. The area is in the City's downtown surrounding the University of Redlands and has a sizeable Hispanic majority. The tract is highly developed but has poor TCAC scores and the highest number of adults living alone with no children. Contributing factors to the areas of high segregation and poverty include the older housing stock and buildings in the tract, limited housing opportunities for higher density and more affordable housing elsewhere in the City, and higher air pollution and diesel particulate pollution due to the proximity of I-10. While the current Downtown Specific Plan permits housing in this area and the City has seen some incremental improvements, this area will benefit from the Transit Villages Specific Plan (TVSP) as it will significantly expand opportunity for transportation, as well as increase housing near existing and future job opportunities. Additionally, the City is expanding its multi-family zoning in areas outside of this tract, providing new opportunities for high quality, affordable housing in new locations in the City.

FIGURE 7-18: RHNA SITES AND R/ECAPS (2021)



Source: HCD AFFH Mapping Tool.

In addition to R/ECAPs, RCAAs should be examined to ensure fair housing choice. Per HCD's AFFH Guidance document, a Racially Concentrated Area of Affluence (RCAA) is an area with a population that is greater than 80 percent White and has a median household income level over $125,000.[25] There are no RCAAs in Redlands meeting this definition as the City has no areas where the percentage of the population that is White is over 79 percent. In fact, there are no RCAAs in San Bernardino County meeting this definition.

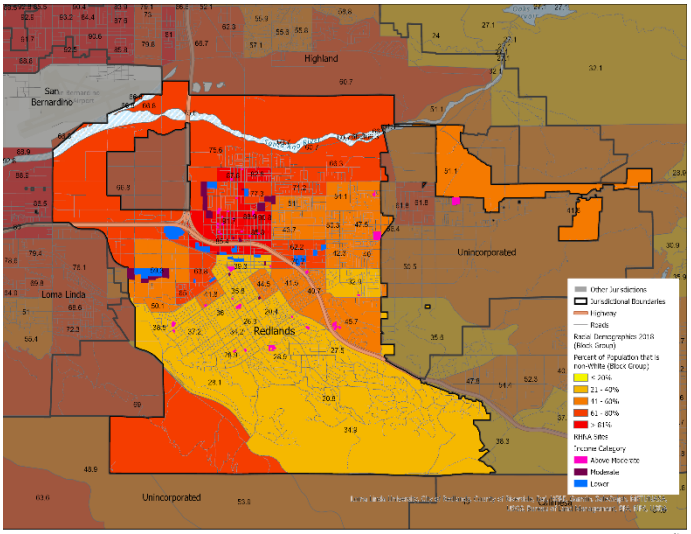
The area around the Redlands Country Club in the southeast portion of the City is trends the closest to an RCAA, with a median household income level over $125,000 and a White population between 60 percent and 79 percent. Large parts of the southernmost areas of Redlands consist of agriculture zoning. South Redlands does have higher levels of non-Hispanic white population and higher incomes as shown in Figure 7-19.

[25] Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update).

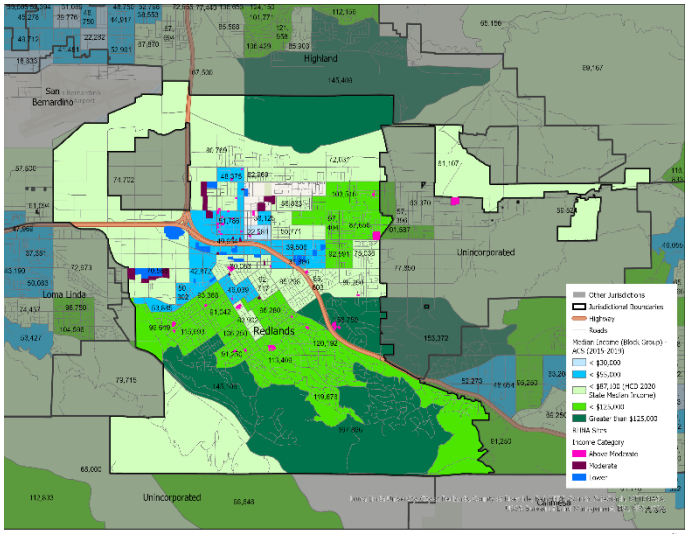
There are similar trends of northeast Redlands showing higher income levels and a population that is between 60 and 75% non-White. Census tract 06071007904 which has a portion in northeast Redlands, has a median income of $145,409; however, this tract has no housing within the City and data for the tract reflects recently constructed subdivisions in the neighboring jurisdiction of Highland. The area of this tract within Redlands is zoned entirely for open space. The areas north of Santa Ana River in the City are all zoned for open space and have no housing within them. The rest of the northeast portion of the City, south of Santa Ana Creek has experienced significant growth in single family development, primarily through Planned Residential Developments. The cost of these newer single family housing units has increased rapidly with the boom in the housing market resulting in a consolidated area of higher housing costs.

While not formally an RCAA, relative to the rest of the City these areas are whiter and more affluent. Development of affordable units is unlikely in these areas due to single-family homes being the primary residence and HOA restrictions. Encouraging new development allowed by SB 9 and increased ADU construction, as outlined by Program 1.6-1, can increase affordable rental units in these areas and diversify the region.

FIGURE 7-19: MEDIAN INCOME AND PERCENT NON-WHITE AND RHNA SITES



RHNA Sites and Percent non-White, 2018



RHNA Sites and Median Income, 2015 - 2019

Source: HCD AFFH Mapping Tool.

7.3.5 Disparities in Access to Opportunity

California Tax Credit Allocation Committee (TCAC) Opportunity Areas

One tool used to analyze disparities in access to opportunities is the California Tax Credit Allocation Committee's (TCAC) Opportunity Area Scores. These were prepared by a task force commissioned by the TCAC and HCD to identify areas statewide whose economic, educational, and environmental characteristics support positive outcomes for low-income families. The tool is updated annually. Opportunity maps are made for three domains: economic, environmental, and education. Each map uses

several indicators to determine their individual score. A composite score and resource designation combining the three categorical scores is assigned to each block group.

To determine final resource category, the top 20 percent of overall scores in a county are labeled as highest resource and the next 20 percent of scores are labeled as high resource. Then, any areas that are considered segregated and that have at least 30 percent of the population living below the federal poverty line are labeled as an area of High Segregation and Poverty. Any remaining uncategorized areas in the County are evenly divided between moderate resource and low resource areas.

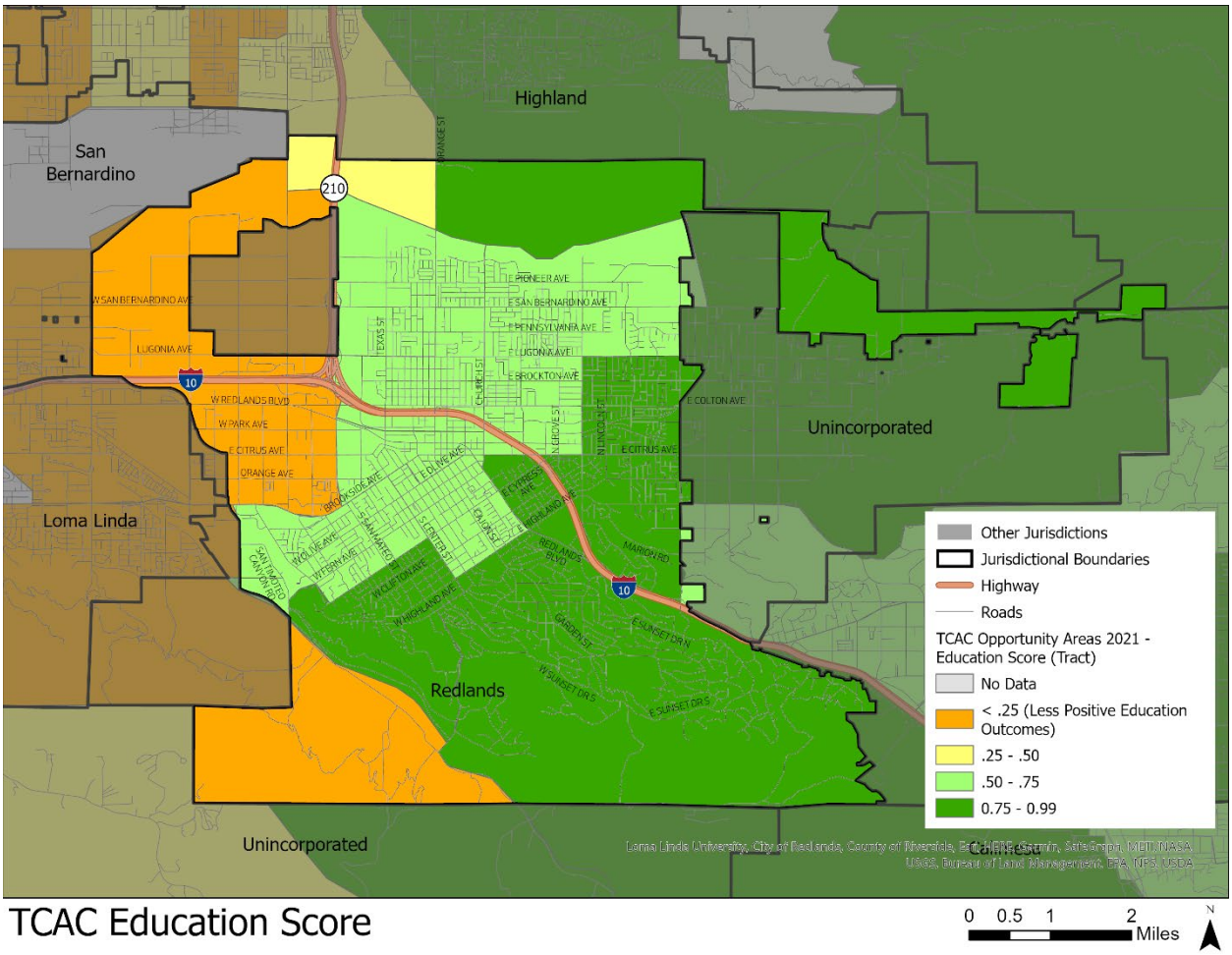
Education

Education indicators for the TCAC include math proficiency, reading proficiency, high school graduation rates, and student poverty rates. Figure 7-20 displays the TCAC education scores for Redlands. Most of the City has positive educational outcomes. The wealthiest areas of the City of Redlands, consisting of the southern section of the City, has the most positive educational outcomes, while the most highly segregated area have middle to high positive educational outcomes. The area with the least positive educational outcome is of moderate diversity and above moderate income. There does not seem to be a correlation between protected groups and proficient and less proficient schools. After requesting further information on disparities between schools in the area from the Redlands Unified School District, it was emphasized that resources are equitably distributed across the district with no disparities that are not actively addressed.

The area with the lowest education score is the northwestern part of the City. It has a high percentage of households with low to moderate income and a high average number of children per household.

Overall, the Redlands Unified School District has an average GreatSchools rating compared to other districts in the state. The ratings are based on academics, equity, and the school environment compared to other public schools in the state. Schools in the northern parts of the City have higher overall scores, while schools around downtown are rated below-average in quality. As public schools receive support from local taxes, these schools may have less resources to provide students with educational support. Additionally, the downtown area of the City has more children in single parent households than the southern area of Redlands, therefore working parents may not have as much time to provide study support for work outside of the classroom. There are less schools in northwest Redlands, but this area is also majority industrial sites with very few residences.

FIGURE 7-20: TCAC EDUCATION SCORE, 2021, REDLANDS



Source: HCD AFFH Mapping Tool.

Economic

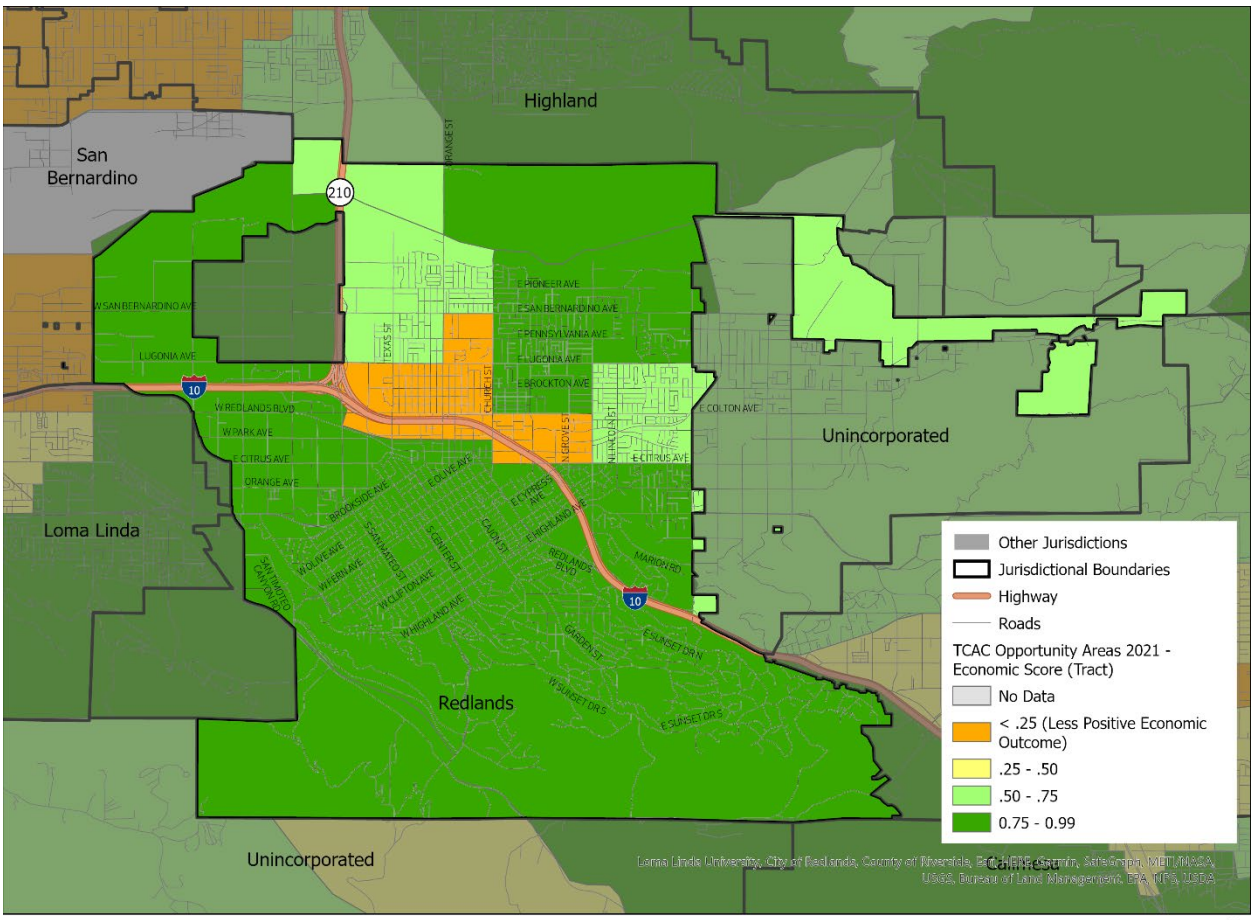
Economic indicators for TCAC scores include poverty, adult education, job proximity, employment, and median home values. The economic scores for Redlands are shown in Figure 7-21. All of Redlands has a generally positive economic outcome score except for two census tracts in the center of the City. These two tracts have less positive economic outcome scores of 0.22. This is the area of high segregation and poverty. The next lowest census tract score in Redlands is 0.68.

The central tracts with scores of 0.22 may have skewed scores due to being occupied by the University of Redlands and therefore having a disproportionately high number of students who are more likely to be unemployed. These tracts also include the Sylvan Mobile Estates, Orange Grove Mobile Estates, and Redlands Ranch mobile home parks as well as two affordable housing developments operated by the San Bernardino County Housing Authority. This area has concentrations of multi-family development and historically lower priced housing opportunities leading to an area with lower incomes. Both census tracts have a high number of lower-income individuals but also a high number of job opportunities at the

University, Esri campus, the Post Office, the retail and service industry in both downtown Redlands and in the "donut hole", and Redlands Unified School District. There may still be low economic outcomes in the two identified tracts as many of these jobs require formal background or education.

The San Bernardino County Transportation Authority Regional Assessment of Fair Housing notes that across San Bernardino County, economic opportunity is higher in the East and West Valley and Mountain subregions and lower in the Morongo Basin and Desert Subregions. [26] It lists the Cities of San Bernardino, Rialto and Fontana as those with lower economic opportunity in the region.

FIGURE 7-21: TCAC ECONOMIC SCORE, 2021, REDLANDS



Source: HCD AFFH Mapping Tool.

Employment

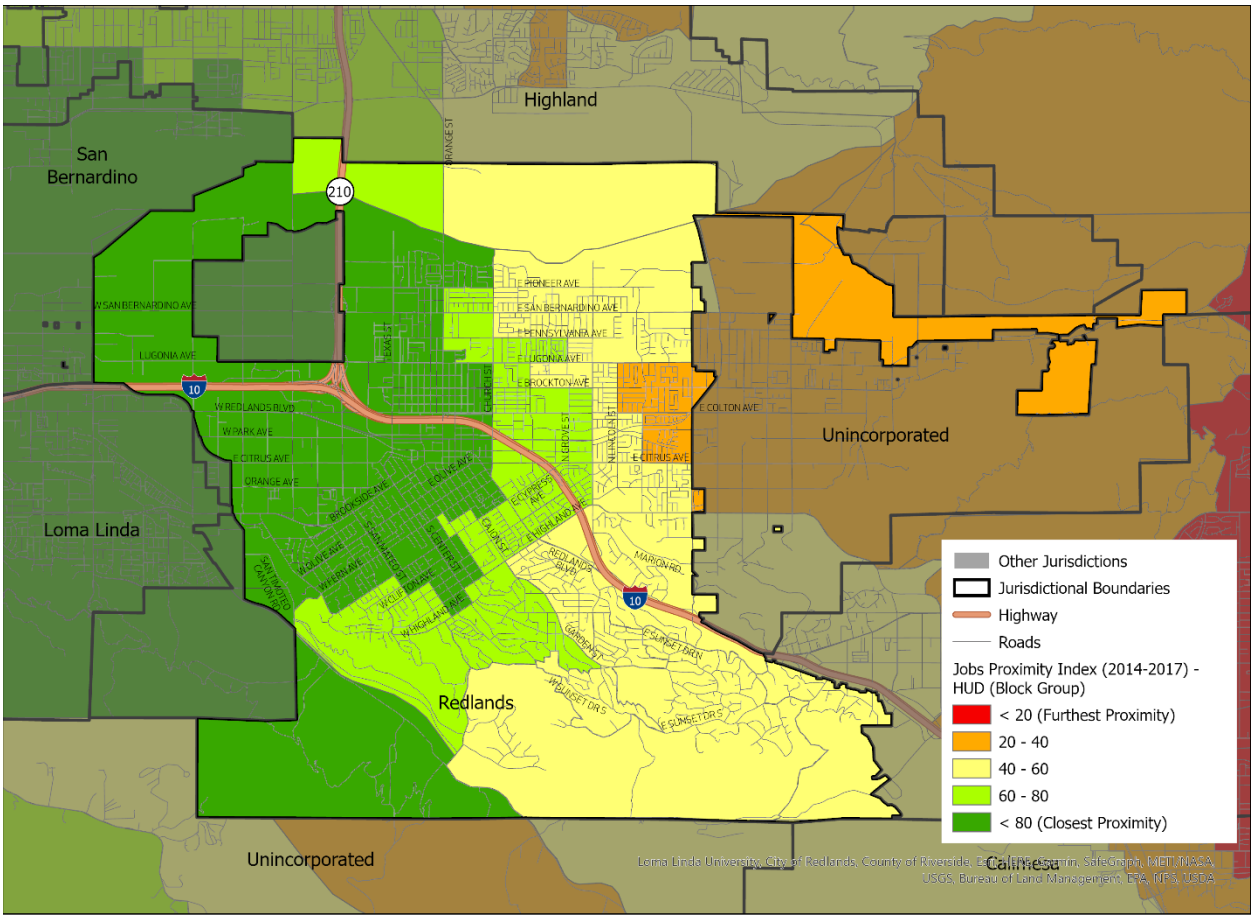
The areas with the lowest median household incomes and highest percentage of non-White population have the closest proximity to jobs and employment, as shown by Figure 7-22, while the wealthier, more

[26] San Bernardino County Transportation Authority, Regional Assessment of Fair Housing, August 2021 Draft.

suburban areas have the lowest proximity in the City. This implies there is not much disparity in access to jobs by protected groups. Importantly, the area considered by TCAC to be "High Segregation and Poverty" has some of the best access to jobs of all types, including high-tech, service, agricultural, and retail industries. Central Redlands has excellent access to Esri and the University of Redlands, which are high quality employers. Additionally, these areas have access to major employers immediately outside of the City boundary, such as the Loma Linda University and Medical Center, and multiple logistics/industrial facilities in the unincorporated donut hole.

The area in the southeast of the City contains hilly terrain and is currently zoned for single-family residential, is almost entirely built-out with single-family neighborhoods, and the lack of commercial, professional, or industrial space can be one reason for the lack of job proximity. The community input received for this cycle indicated that residents felt that limited transit is affecting access to employment and requested that the TVSP area provide sufficient housing to increase the number of residents with excellent access to transit. The compact mixed-use villages centered around the three new Metrolink/Arrow passenger light rail stations of the TVSP will improve access to jobs in this area by increasing density near transit as well as increasing transportation services.

FIGURE 7-22: JOB PROXIMITY INDEX, 2014-2017 REDLANDS



Jobs Proximity Index

Source: HCD AFFH Mapping Tool.

Environmental

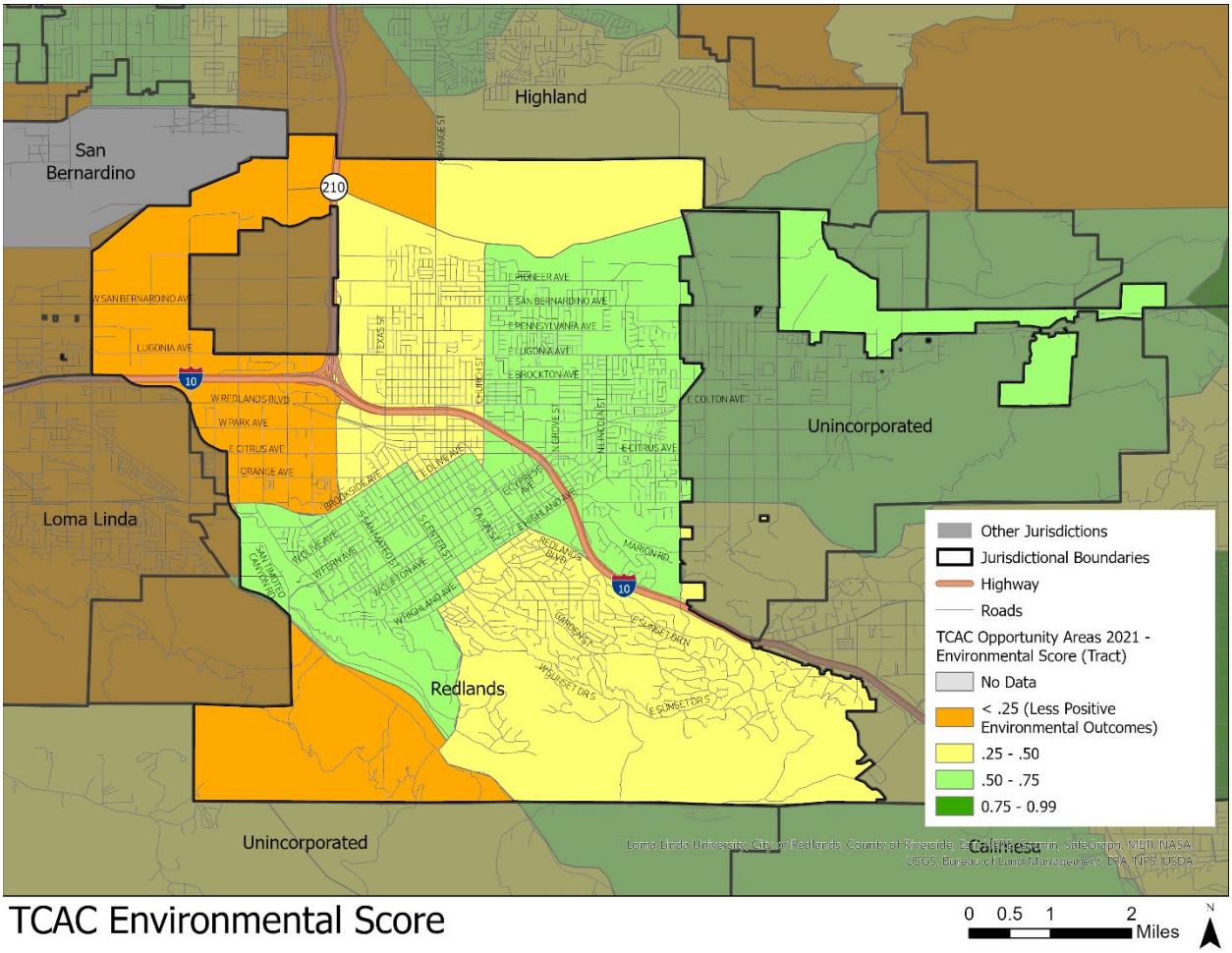
The TCAC environmental score is based on CalEnviroScreen 3.0 pollution indicators and values. Environmental scores are lowest (worst) throughout the middle section of the City and are higher (better) on the north and south ends. The lowest (worst) environmental scores are seen on the border of Loma Linda and San Bernardino.

Overall, Redlands achieves less favorable TCAC scores for environmental conditions than it does for economic and education opportunities. This is largely explained by air quality pollution from I-10, SR 210, large logistic and distribution uses in and around the donut hole and airport. Some of these effects are mitigated by the strong economic and educational resources of Esri and the University of Redlands. These areas also correspond with the areas with lower incomes, higher rates of poverty, racial and ethnic segregation, and single-parent households.

The downtown/central area census tract (06071008002) is in the 91st percentile for communities in the State that are disproportionately burdened by multiple sources of pollution. The northwest second census

tract (6071007800) is in the 73rd percentile, which is very close to the 75th percentile threshold to require preparation of an Environmental Justice Element.

FIGURE 7-23: TCAC ENVIRONMENTAL SCORE, 2021, REDLANDS



Source: HCD AFFH Mapping Tool.

CalEnviroScreen

CalEnviroScreen 4.0 is a tool that identifies communities in California that are affected by pollutants and polluting factors such as ozone, particulate matter, drinking water contaminants, pesticide use, lead, toxins, diesel particulates, traffic density, cleanup sites, groundwater threats, hazardous waste, solid waste, and impaired water bodies. A higher score indicates a higher effect of pollutants on the indicated area. RHNA sites and the CalEnviroScreen 4.0 scores for Redlands are shown in Figure 7-24.

A high CalEnviroScreen 4.0 score indicates high pollution. Scores are on a scale of 0-100. Therefore, an area with a score in a high percentile, such as the areas around the donut hole that have scores between 71 and 80, has high levels of pollution from ozone, diesel matter traffic, or drinking water contamination.

If an area is in the top 25% of CalEnviroScreen scores, the city must include environmental justice goals in its General Plan.

The lower half of the City, which is predominantly white families, has the lowest scores in the City of Redlands, with a middle range of scores from 21%-60%. The mid-range scores extend through the northeast corner of the City. The area around the "donut hole" in the northwest corner of the City has a higher score of 71%-80% due to high ozone, diesel particulate matter, traffic, and drinking water contaminant scores. These scores can be attributed to the location central to major Highways 10 and 210, as well as the San Bernardino Airport, which lead to ozone and diesel particulate matter contaminated air from vehicle emissions. Additionally, this neighborhood is primarily industrial, with a large number of warehouses and distribution facilities. The location directly east of the airport is in the 91%-100% score range, which may also be explained by the high ozone levels that comes with adjacency to a commercial airport. The City is also a location for four Superfund sites:

- Lockheed Propulsion Co., 1500 Crafton Avenue, northeast portion of the City
- Redlands Airport, 1745 Sessums Drive, northeast portion of the City
- Redlands Shooting Park, 2125 Orange Street, north-central portion of the City
- Redlands Smudge Pot Tanks Site, 100 Feet West of Redlands Boulevard and Texas Street, central portion of the City

Neither information on the type of contaminants nor the status were available. None of these Superfund sites are within residential zoning districts.

In recent years, the City has required air quality and health risk assessments be prepared for residential or educational facility projects within 500 feet of major arterials, highways, or interstates. In these scenarios, the City has required high efficiency particulate air filters with a Minimum Efficiency Reporting Value (MERV) of 13 or better, which is the highest end of the MERV range.

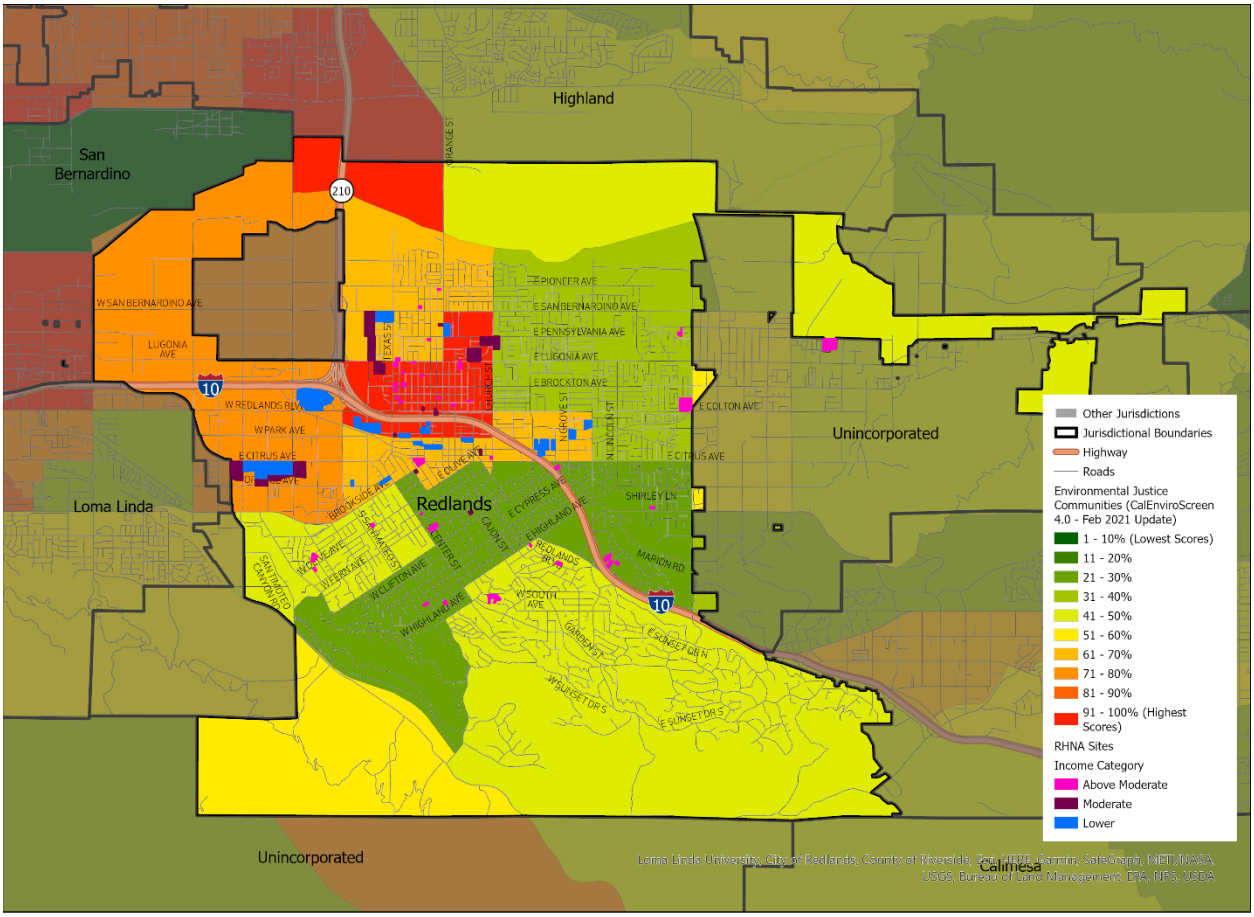
The area with the highest score, in the 91%-100% range, is the area of high segregation and poverty in central Redlands, including downtown and the university areas. Much like the area near the airport, this tract earns its high score from ozone and diesel particulates in the air from industrial uses and traffic on Highway 210 and I-10. This area may have a higher score than the northwest, as poverty is a factor in CalEnviroScreen 4.0, and this area is specifically labeled as high poverty.

Figure 7-24 displays the RHNA sites by income level and CalEnviroScreen 4.0 percentiles scores. The accompanying chart in Figure 7-25 displays the percentage of RHNA units and City acreage that fall into each percentile group of the CalEnviroScreen 4.0 scores. Almost 50% of RHNA units are located in an area that is in the 70th to 80th percentile of CalEnviroScreen 4.0. However, despite the poor CalEnviroScreen scores, these areas have the best long-term opportunities and access to transit, employment, services, and supporting infrastructure. Transit improvements and investments may lower traffic and pollution scores in the areas. The massive investments in the three new Metrolink stations and the TOD planned as part of the TVSP will ensure that these areas will have among the best quality of life in the area.

Environmental concerns, primarily air quality pollutants from the freeways and San Bernardino Airport can be mitigated with high efficiency HVAC filtration that ensures excellent indoor air quality.

Comparatively to the region, Redlands has higher CES 4.0 scores than jurisdictions to the west and south, such as the City of San Bernardino, Colton, and parts of Riverside county, which all have high CES 4.0 percentile scores in the 80s and 90s. It scores similarly to jurisdictions to the east, such as Yucaipa and unincorporated areas of San Bernardino County.

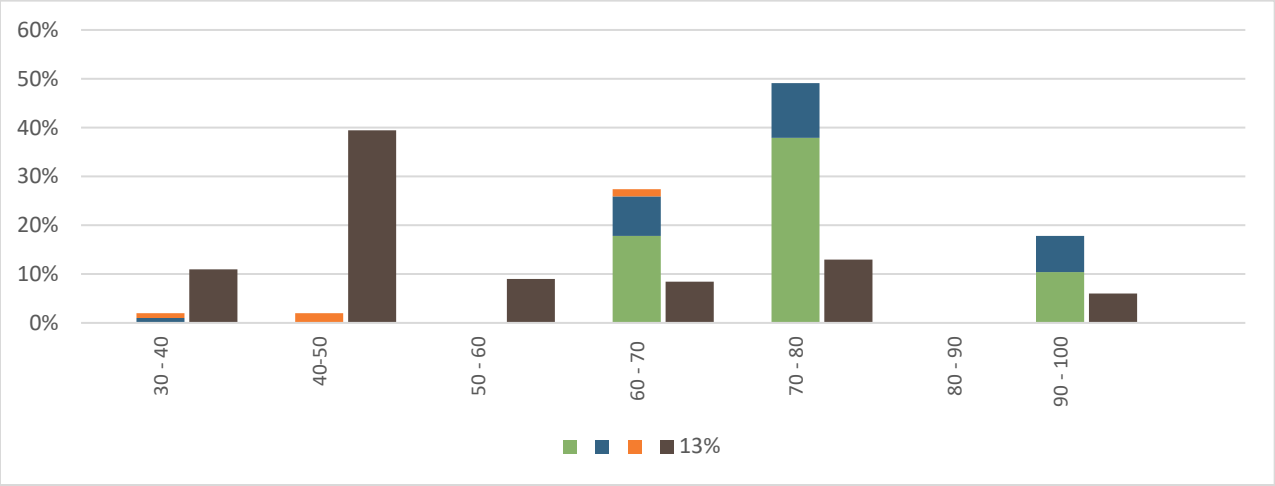
FIGURE 7-24: RHNA SITE DISTRIBUTION AND CALENVIROSCREEN 4.0 (2021)



RHNA Sites and CES 4.0 Percentile Scores

Source: HCD AFFH Mapping Tool.

FIGURE 7-25: RHNA UNITS BY INCOME AND CITY ACREAGE BY CAL ENVIRO SCREEN 4.0 PERCENTILE



Source: HCD AFFH Mapping Tool and City of Redlands.

Table 7-4 provides additional details on the CES 4.0 scores for each census tract. The census tracts are shown with their population, CES 4.0 percentile score, TCAC opportunity category, and selected categories from the CES score of pollution percentile, poverty percentile, and traffic percentile. These factors are some of those that vary widely across the City and show the differences in environmental hazard exposure between the tracts. As shown in the map above, tracts in the southern and northwestern area have the most positive CES 4.0 scores.

There are three tracts are 6071007200, 6071007604, and 6071008002 that fall above the 90th percentile range. These are low resource and the area of high segregation and poverty. These areas are within the TVSP. These areas are classified as disadvantaged communities and would be the areas subject to an Environmental Justice Element to address the needs of these areas.

TABLE 7-4: CES 4.0 SCORES BY CENSUS TRACT

Census Tract	Population	Cal Enviro Score Percentile	Pollution Percentile	Poverty Percentile	Traffic Percentile	Opportunity Category
6065042412	5129	39.0	31.7	27.0	20.3	Moderate Resource
6065043822	2689	71.6	74.6	44.5	32.3	High Resource
6065043823	7023	44.1	51.0	16.9	50.9	Highest Resource
6071007200	6798	92.3	96.8	85.8	80.1	Low Resource
6071007302	10039	55.4	84.1	23.8	27.0	Moderate Resource
6071007306	5859	32.1	79.7	54.5	35.7	Moderate Resource
6071007604	4306	91.2	93.5	52.4	54.3	Low Resource
6071007800	4912	73.2	95.0	58.4	81.0	Low Resource

Census Tract	Population	Cal Enviro Score Percentile	Pollution Percentile	Poverty Percentile	Traffic Percentile	Opportunity Category
6071007904	6697	49.2	48.6	17.9	12.6	Highest Resource
6071008001	6513	69.0	62.7	40.6	71.6	High Resource
6071008002	7256	90.4	88.1	95.6	80.0	High Segregation and Poverty
6071008100	3182	67.5	71.6	75.8	32.1	High Resource
6071008200	5147	29.5	44.9	49.2	6.7	High Resource
6071008301	6340	41.7	45.7	28.3	7.1	High Resource
6071008302	3106	20.6	38.4	13.4	4.5	Highest Resource
6071008401	9953	33.3	37.0	38.0	14.9	High Resource
6071008402	6448	35.0	22.5	38.4	9.2	High Resource
6071008403	5833	24.8	53.4	14.0	69.6	Highest Resource
6071008404	2729	66.8	56.4	92.5	73.8	Moderate Resource
6071008500	8316	42.2	83.3	12.8	69.5	Highest Resource
6071008601	5618	50.7	47.5	45.7	6.6	High Resource
6071008602	3564	46.7	51.5	37.0	6.4	High Resource
6071008706	12298	31.9	60.8	22.1	65.0	High Resource

Source: CalEnviroScreen 4.0

Composite Scores

Figure 7-26 displays the TCAC composite score for Redlands. Composite scores vary throughout the City, with higher resources on the northern and southern portions of the City. There is one tract with high segregation and poverty in the center of the City. Tracts on the west side of the City are identified as low resource areas. Contributing factors to the areas of high segregation and poverty include the older housing stock and buildings in the tract, limited housing opportunities for higher density and more affordable housing except in these areas, and higher air pollution and diesel particulate. The single-family housing stock in this census tract is not dissimilar in age, type, and size as the housing stock in the south-central portion of the City; however, the south-central portion of the City has several locally designated historic districts and individually designated historic structures. The City's policies on historic preservation and the application of historic district designations to the south portion of the City has resulted in better maintenance and higher desirability. While a historic resources survey of housing stock north of I-10 found that the north-central area was eligible for local historic district designation, this area has no protections or guidelines for historic structures. This dichotomy of historic preservation application can be attributed

to the north-central portion of the City having greater rehabilitation and maintenance needs, thus contributing reduced desirability.

In the Inland Empire as a whole, just over 9% of the tracts have high segregation and poverty, including the areas surrounding the San Bernardino Airport, adjacent to the City of Redlands.

The four environmental, education, economic, and composite TCAC scores are shown in Table 7-5 for each census tract. The two lowest scoring tracts are in the downtown/central and northwest areas. One tract (06071008002) is identified as high segregation and poverty, the second census tract identified as low resource. It includes the donut hole that is not within City boundaries. Two tracts are moderate resource, one of which is east of the tract that is high segregation and poverty. Additionally, the tract in the southwestern corner of the City is moderate resource however, the majority of this tract lies in the City of Loma Linda. The rest of the tracts in Redlands are high or highest resource.

TABLE 7-5: OPPORTUNITY MAP SCORES AND CATEGORIZATION, 2021

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
06071007800	0.61	0.01	0.53	0.38	Low Resource
6071007901	0.85	0.74	0.81	0.61	Highest Resource
06071007903	0.81	0.66	0.81	0.55	Highest Resource
06071007904	0.90	0.45	0.81	0.59	Highest Resource
06071008001	0.59	0.37	0.60	0.04	Moderate Resource
06071008002	0.09	0.26	0.53	N/A	High Segregation & Poverty
6071008100	0.66	0.37	0.79	0.30	High Resource
06071008200	0.85	0.62	0.77	0.51	Highest Resource
6071008301	0.84	0.54	0.80	0.52	Highest Resource
06071008302	0.94	0.71	0.77	0.66	Highest Resource
06071008401	0.78	0.62	0.63	0.27	High Resource
6071008402	0.62	0.75	0.74	0.33	High Resource
06071008403	0.90	0.57	0.83	0.65	Highest Resource
06071008404	0.17	0.54	0.72	0.07	Moderate Resource
06071008500	0.98	0.29	0.90	0.85	Highest Resource

Source: California Fair Housing Task Force; TCAC/HCD Opportunity Maps, 2020 Statewide Summary Table, December 2020.

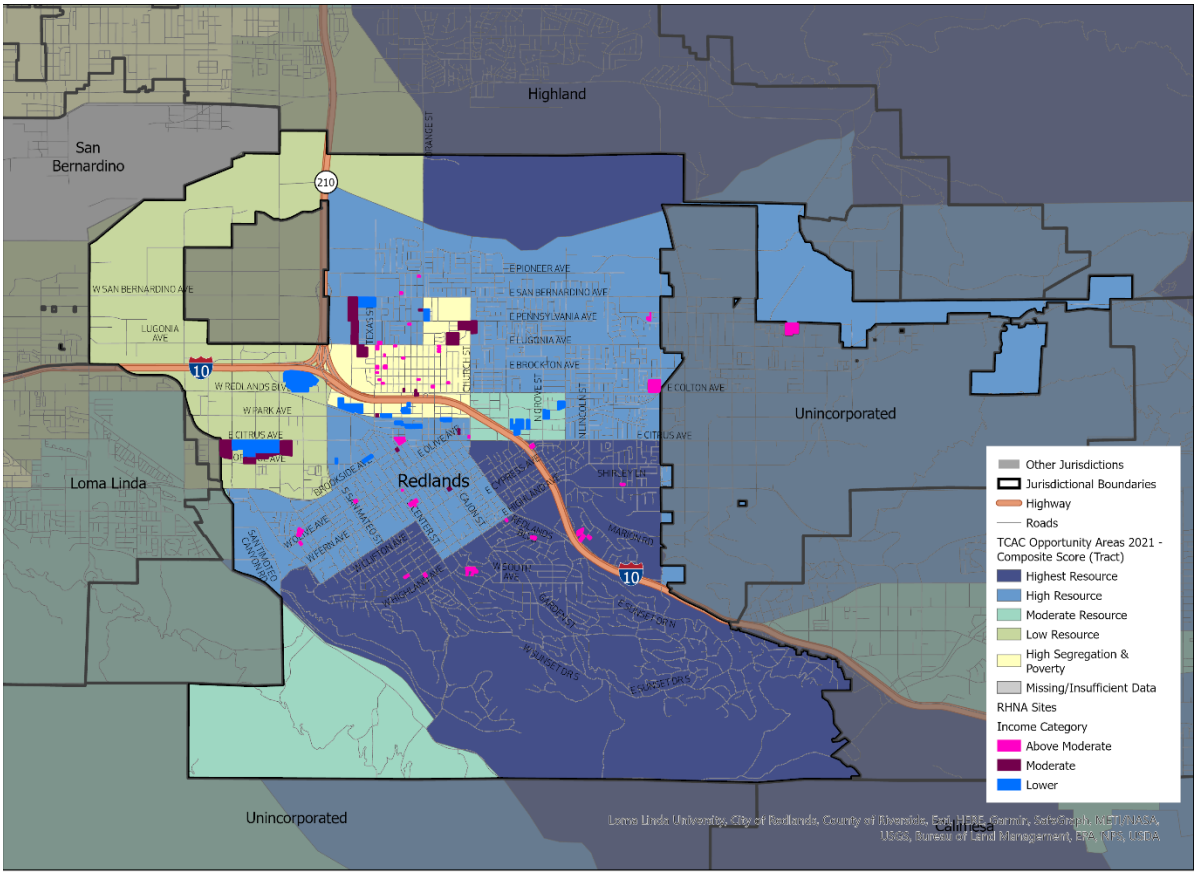
The City has prepared a draft Transit Villages Specific Plan (TVSP) that is currently undergoing environmental review and is anticipated to be heard for adoption in mid-2022. The TVSP would establish a policy environment promoting transit-oriented development (TOD) around three Metrolink / Arrow passenger light rail stations that have been recently constructed and are presently undergoing testing for live operation in 2022. These stations are located at the Esri campus, downtown Redlands Santa Fe Depot,

and the University of Redlands. The combination of the transit stations, complementary and mixed land uses, and new TVSP and/or development code updates promoting TOD will attract investment, opportunity, and resources to the areas of the City in most need.

The TVSP is a place-based investment in central Redlands. The TVSP will not cause any displacement, as the areas surrounding the specific plan area are largely nonresidential; any residential areas nearby were not included in the plan in order to prevent displacement. Redeveloping the area to transit-oriented-development will only benefit the area and increase opportunity, not cause any displacement.

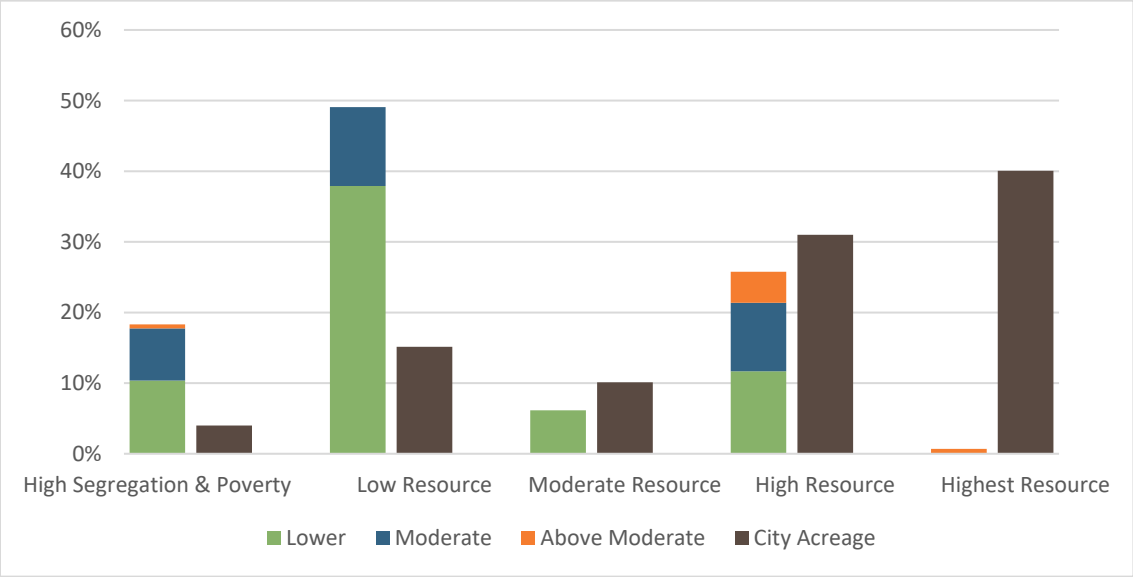
Figure 7-26 displays the RHNA sites by income level and TCAC composite score by census tract. The accompanying chart shown in Figure 7-27 displays the percentage of RHNA units by income and percentage of the City acreage in each TCAC opportunity designation. One census tract falls into the high segregation and poverty category, and slightly less than 20% of units are located in the tract. Just under 50% of units are located in the low resource category. Though much of the City is in the highest resource category, the highest resource areas in the south part of the City are not suitable for moderate- or high-density housing. It includes areas of open space and with topographic challenges to development in the southeast portion of the City. Sites that are located in high resource areas include a mix of anticipated income levels. The highest resource designated areas, the south part of the City, do not have access to downtown and employment centers via public transportation.

FIGURE 7-26: RHNA SITES AND TCAC COMPOSITE SCORE (2021)



Source: HCD AFFH Mapping Tool.

FIGURE 7-27: RHNA UNITS BY INCOME AND COMPARISON BY TCAC COMPOSITE CATEGORY



Source: HCD AFFH Mapping Tool and City of Redlands.

Though the RHNA sites are concentrated in areas that have lower TCAC designations, they are located in areas suitable for further development in the City. Many RHNA sites are located in the TVSP area, the TVSP is anticipated to attract investment and increase access to resources in the downtown area of the City. RHNA Sites are located in areas with access to public transit and downtown resource and services. The sites are not expected to have an adverse effect on access to opportunities but rather improve and revitalize access to opportunities in the areas of the City with lower TCAC designations.

7.3.5.1 Opportunity Indicators Regional Comparison

Table 7-6 compares access to opportunities between Redlands and San Bernardino County as a whole. These indicators are based on HUD's set of opportunity indices. In many of the indicators, Redlands scores are close to the County as a whole. Redlands has a higher rate of poverty among Native American and Alaska Natives and Native Hawaiian and Other Pacific Islanders. These two groups combined make up less than 2% of the population in Redlands.

Redlands has a lower percentage of Title I Schools in comparison to the County. A Title I school is a school in which children from low-income families make up at least 40% of the enrollment. Title I schools are eligible to use federal grant funds to help meet the educational needs of students.

Compared to the region, downtown Redlands and the TVSP area has excellent access to employment, transportation, and education opportunities. The new light rail represents a regional opportunity to increase equity and provide climate-friendly housing growth and development.

TABLE 7-6: ACCESS TO OPPORTUNITY INDICATORS – CITY AND COUNTY

Indicator	Redlands	San Bernardino County
Poverty Rate		
Population Below Federal Poverty Level	11.2%	13.3%
White alone	8.7%	10.3%
Black or African American alone	17.9%	20%
Native American and Alaska Native alone	18.1%	9.5%
Asian alone	8.5%	7.7%
Native Hawaiian and Other Pacific Islander alone	53.4%	24.9%
Hispanic or Latino	15%	14.3%
School Proficiency		
Total Title I Schools	17	472
Total Schools	26	558
% of Schools	65.4%	84.6%
Unemployment Rate		
February 2021	4.8%	8.6%
Transit Metrics		
All Transit Performance Score	6.0	4.4
Transit Trips Per Week within ½ Mile	1,534	1,098
Jobs Accessible in 30-Min Trip	43,978	44,660
Commuters Who Use Transit	0%	1.6%
Transit Routes within ½ Mile	2	3

Source: 2020 Regional Analysis of Impediments to Fair Housing Choice; California Department of Education Public Schools and Data File February 2020; California Employment and Development Department, Labor Force and Unemployment Rate for Cities and Census Designated Places, February 2021; https://alltransit.cnt.org/metrics/, accessed July 20, 2021; CalEnviroScreen 3.0 Results (June 2018 Update).
Sum does not equal 100 due to rounding.

Transportation

Omnitrans is San Bernardino County's public transportation system that serves the San Bernardino Valley. Services include 27 routes including buses, bus rapid transit, and paratransit. Of the three Omnitrans bus routes that operate in the City, only one reaches the area with low educational outcome, and there is little to no transit service available within that northwest wing of the City. This may affect access to education, but the degree of inaccessibility portrayed by Figure 7-20 may be misleading as there are few residences in the primarily industrial area north of the I-10.

Compared to the County as a whole, Redlands scores slightly higher in transportation metrics; however, the region as a whole scores low in transportation metrics. The AllTransit Performance score is measured on a scale from zero to ten, with ten being the highest score. Redlands scores a 6.0 on this scale, compared to the whole County, which scores a 4.4. The addition of three new Metrolink & Arrow passenger light rail stations for downtown, the Esri campus, and the University of Redlands will dramatically improve transit service and usage in Redlands and is expected to be a major factor and catalyst in the future growth and economic development of these areas and the entire City of Redlands via the proposed TVSP. The areas around each of the three new Metrolink & Arrow passenger light rail stations will feature and promote compact, urban, walkable mixed-use redevelopment of new housing, services, and employment opportunities that will form an attractive urban core and a full range of new housing options for all household types and incomes. The new investment and development will include new amenities, services, and businesses that will serve and improve the quality of life for existing and new neighborhoods, visitors, employees, and residents of Redlands.

San Bernardino County's public transportation system is Omnitrans, which services the San Bernardino Valley. Services include 27 routes including buses, bus rapid transit, and paratransit. Of the three Omnitrans bus routes that reach the City of Redlands, only one reaches the area with the highest percentage of people in the low to moderate income level and a sizeable Hispanic majority. Generally, transit routes follow east-west corridors along Lugonia Avenue and Citrus Avenue/Brookside Avenue/Barton Road. North-south transit is located along Orange Street/Cajon Street. Both these routes connect to downtown; however, these routes do not reach beyond these corridors to communities and first mile/last mile connectivity remains an ongoing issue. SBCTA recently completed a Station Access Plan to study connectivity in proximity to the train stations, and the City of Redlands recently completed a Sustainable Mobility Plan to study pedestrian and bicycle connectivity throughout the city including to the train and transit stations.

Tracts in the southwest portion of the City have higher percentages of disabled persons and are not served by public transit, except for along the Brookside Avenue/Barton Road corridor. Block groups with the highest percentages of non-White populations and female householders, as well as highest percentages of populations with low to moderate incomes, are located near transit corridors along Orange Street and Lugonia Avenue, yet first mile/last mile connectivity remains an ongoing issue.

The area with the worst job proximity also has the highest median income, so although they will have increased transportation costs in the form of necessary car ownership, this subset of the population will generally not be overly affected by the excess costs. Transit use is, long term, cheaper than automobile use, and walkable areas eliminate transportation costs all together.

The San Bernardino County Transportation Authority (SBCTA) recently completed construction of a new passenger rail line connecting Redlands to the Metrolink system and is establishing a new light rail system called the Arrow light rail, which is the catalyst for the proposed TVSP in Redlands. The project has constructed three new train stations in Redlands in areas of concentrated employment opportunity and activity. The stations are located adjacent to Esri's headquarters at Redlands Boulevard &New York Street, in the center of downtown at the historic Santa Fe Depot, and adjacent to the University of Redlands campus at University Street & Park Avenue. The new Metrolink/ Arrow light rail stations will create direct

and efficient connections to major regional destinations such as the San Bernardino Metrolink station, which connects to downtown Los Angeles, Riverside, and Santa Ana. The Metrolink/ Arrow light rail is expected to begin service in 2022.

The public requested to SBCTA transit accessibility and housing near rail stations, extending beyond the university. This desire for increased transit accessibility also made evident a desire for more density. To maximize ridership on the Metrolink/ Arrow light rail service, the City is updating land uses around the planned stations. The implementation of the TVSP around the university, downtown, and Esri campus will significantly increase housing and employment opportunities in these areas. Importantly, the stations and the TVSP will contribute to the revitalization of downtown and increase investment and resources in the tract classified as having patterns of high segregation and poverty. Much of the land around the three station sites is either vacant or underutilized, and primed for transit-oriented infill development.

The goal of the TVSP is to transform vacant and underutilized parcels within one-quarter mile of each station into a lively, transit-oriented neighborhoods. Tree-lined streets and sidewalks provide safe and convenient access to the station, the Esri campus, and downtown. Greens and neighborhood parks create open, accessible, fresh-air spaces for both residents from surrounding multifamily buildings as well as nearby office workers. Buildings accommodate housing for a variety of income levels and family types, including parents with children and seniors. It will enable employees of Esri and other local businesses and institutions to live in Redlands. The downtown station area is intended to be a walkable mixed-use district of pedestrian-scaled blocks, beautiful tree-lined streets with comfortable seating and exterior dining and inviting squares and plazas. Surface parking lots are infilled with urban buildings that frame the sidewalks. The university station area is intended to be the “Town” counterpart to the university’s “gown” with amenities for students, faculty, and staff to live, work, shop, dine, and study.

Anticipation of the TVSP and transit stations has already led to significant investment by downtown property owners with the development of commercial retail/dining and professional office uses in the immediate area around the downtown station. These recent developments were designed with an emphasis on pedestrian amenities, walkability and connectivity, and enhanced landscaping. A four-level parking garage is also currently under construction adjacent to the downtown Metrolink platform to enable a “park once” model for downtown and eliminate the need to drive from destination to destination in the immediate area.

7.3.5.2 Disparities in Access to Opportunity for Persons with Disabilities

The City of Redlands permits transitional and supportive housing in all zones that allow residential use, with no restrictions other than those imposed on similar residential uses in the same zone.

7.3.5.3 Findings

Disparities in access to opportunities across Redlands mirrors patterns shown in the integration and segregation analysis. The central areas of the City include tracts that have lower access to opportunity than the rest of the City, with one census tract in the high segregation and poverty area. The downtown area has the highest CalEnviroScreen score. The central areas of the City are likely to see improved access to transit with the construction of three train stops, and significant investment and opportunity through

the TVSP. In Redlands, higher opportunity areas (as defined by the TCAC) correlate strongly with higher income populations. Conversely, areas with lower access to opportunities tend to have lower income and larger minority populations. There are no clear patterns showing access issues for populations with disabilities.

Contributing factors to fair housing issues pertaining to access to opportunity include lower environmental quality in census tracts and community opposition to new development. These factors are addressed through Program 1.5-8 Residential Development in High Opportunity Area, 1.1-2 TVSP, Program 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs and ADU Outreach in Program 1.6-1.

7.3.6 Disproportionate Housing Needs

Disproportionate housing needs are analyzed by assessing substandard housing by tenure, race, household size, and elderly households.

7.3.6.1 Substandard Housing

A household is considered to be substandard or have a housing problem if the home has one or more of the following housing problems:

- Housing unit lacks complete kitchen facilities
- Housing unit lacks complete plumbing facilities
- Household is overcrowded (more than 1 person per room including living and dining rooms but not including the bathroom or kitchen)
- Household is cost burdened (monthly housing costs including utilities exceeds 30% of the monthly household income)

Table 7-7 reveals the trends relating to housing problems and race. Compared to the overall population of the City of Redlands, the percentage of White or Asian households with housing problems is much lower than the percentage of total White or Asian households in the City. In Contrast, the percentage of Black, Native American, and Pacific Islander households with housing problems is approximately double the percentage that would be expected by their proportions of the overall population, meaning that these races are disproportionately experiencing at least one of the four housing problems. The percentage of Hispanics or Latinos with housing problems is comparable to the overall percentage that the Hispanic population makes up of the City's total population.

The same trends extend to the County level: White and Asian households make up proportionately fewer households with housing problems than their overall population. However, Countywide, this trend also applies to the Hispanic, Pacific Islander and Native American populations, unlike in the City of Redlands. The City's trend of Black households making up proportionately more households with housing problems population than their overall population also extends to the County level.

TABLE 7-7: ANY HOUSING PROBLEM BY TENURE AND RACE

	White	Black	Asian	Am Indian	Pac Islander	Other	All	Hispanic
Redlands Total with Housing Problems	4,650	700	530	55	40	170	8,705	2,860
	50.0%	8.0%	6.1%	0.6%	0.5%	2.0%	100.0%	32.9%
Owner-Occupied	*2,080*	*120*	*250*	*15*	*15*	*60*	*3,700*	*1,160*
	23.9%	*1.4%*	*2.9%*	*0.2%*	*0.2%*	*0.7%*	*42.6%*	*13.3%*
Renter-Occupied	*2,570*	*580*	*295*	*40*	*25*	*110*	*5,320*	*1,700*
	29.5%	*6.7%*	*3.4%*	*0.5%*	*0.3%*	*1.3%*	*61.0%*	*19.5%*
All Households with or without Housing Problems	28,392	3,870	5,729	332	147	5,346	71,830	23,261
	39.9%	5.4%	8.1%	0.5%	0.2%	7.5%	100.0%	32.7%
San Bernardino County Total with Housing Problems	86,325	30,710	18,315	1,060	629	6,385	281,885	138,465
	30.6%	10.9%	6.5%	0.4%	0.2%	2.3%	100.0%	49.1%
Owner-Occupied	46,885	8,215	11,325	575	240	2,180	129,495	60,075
	16.6%	2.9%	4.0%	0.2%	0.1%	0.8%	45.9%	21.3%
Renter-Occupied	39,440	22,495	6,990	485	389	4,205	152,390	78,390
	14.0%	8.0%	2.5%	0.2%	0.1%	1.5%	54.1%	27.8%
All Households with or without Housing Problems	169,364	179,292	154,332	17,782	6,838	368,600	2,149,021	1,145,874
	7.9%	8.3%	7.2%	0.8%	0.3%	17.2%	100.0%	53.3%

Source: HUD CHAS 2013-2017.

Note: Data excludes households with two or more races.

An elderly household is a household where either the head of the household is over 62 years of age or there are two people over 62 years of age in the household. In the City of Redlands, elderly households make up 18% of the overall population, but 34% of households with housing problems; Countywide, elderly households make up 12% of the total population, but 28% of the households with housing problems. This disproportionate representation, shown in Table 7-8, may be due to how many elderly households may have acquired their home when employed and now are living on a fixed income (e.g., salary from Social Security), thus creating a cost burden that does not leave enough excess funding to repair housing problems. Additionally, if elderly people acquired their home a long time ago, the older building may have more need of repair compared to a home more recently acquired by someone younger with more flexible income. Aging in place assistance may help remedy this imbalance.

Large households are considered households with three or more children, whether there is one present parent or two, but are often also measured as households with over five people, regardless of the number of children. The table below reveals that despite large households making up only 7% of the overall

population in the City of Redlands, they make up 18% of the households with housing problems. Countywide, large households make up 10% of the population, but 26% of the households with housing problems. Large households may have increased non-housing costs such as paying for other basic needs like food, day care, insurance, health costs, transportation, and utilities which results in less funding available for housing repairs.

TABLE 7-8: HOUSING PROBLEMS FOR ELDERLY AND LARGE HOUSEHOLDS BY TENURE

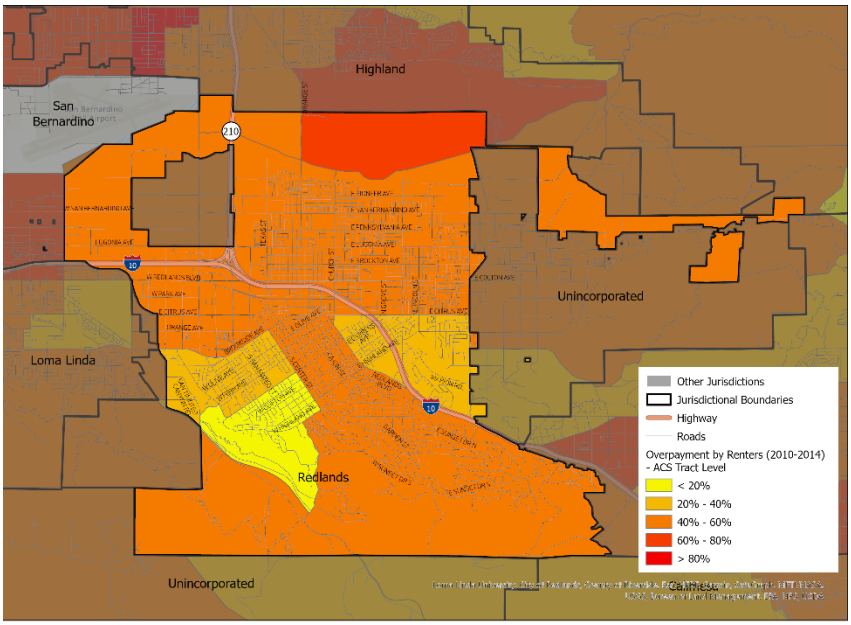
	Elderly Renters with Housing Problem	Elderly Owners with Housing Problem	All Elderly Households with Housing Problems	Total Elderly Households	Large HH Renters with Housing Problem	Large HH Owners with Housing Problem	All Large Households with Housing Problems	Total Large Households
City	1,170	1,780	2,950	12,670	985	585	1,570	5,084
County	28,670	50,175	78,845	263,060	40,850	33,005	73855	220,240

Source: HUD CHAS 2013-2017.

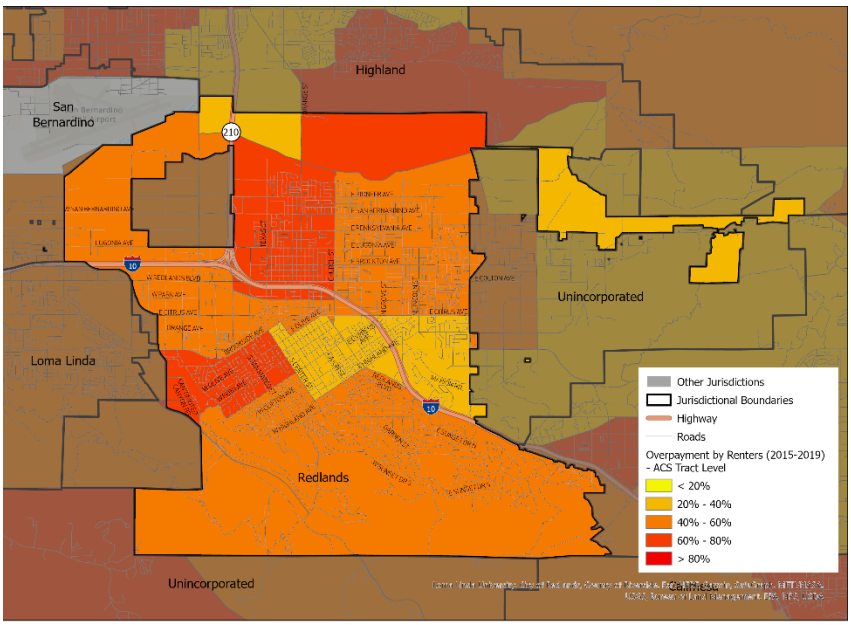
7.3.6.2 Cost Burden

Households are considered cost burdened if they spend more than 30% of their income on household costs, including utilities Figure 7-28 displays the percentage of renter households that are experiencing a cost burden by census tract from 2010-2014 and 2015-2019. There is no tract in the City where less than 20% of renters are cost burdened. There is only one tract that is fully in the City where less than 40% of renters are cost burdened. Most tracts have more than 40% of renters experiencing a cost burden. The percentage of renters who are cost burdened increased from 2010-2014 in the southeast and downtown areas of the City. The percentage of cost burdened renter households decreased from 40-60% to 20-40% in three census tracts in the northeast, central and northwestern areas.

FIGURE 7-28: OVERPAYMENT BY RENTERS, 2010-2014 AND 2015-2019



Overpayment by Renters, 2010-2014

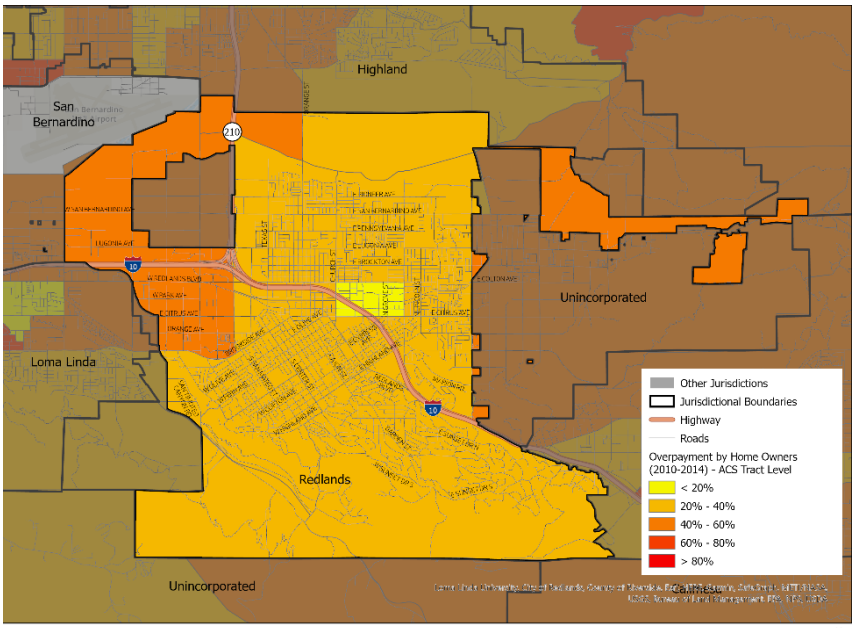


Overpayment by Renters, 2015-2019

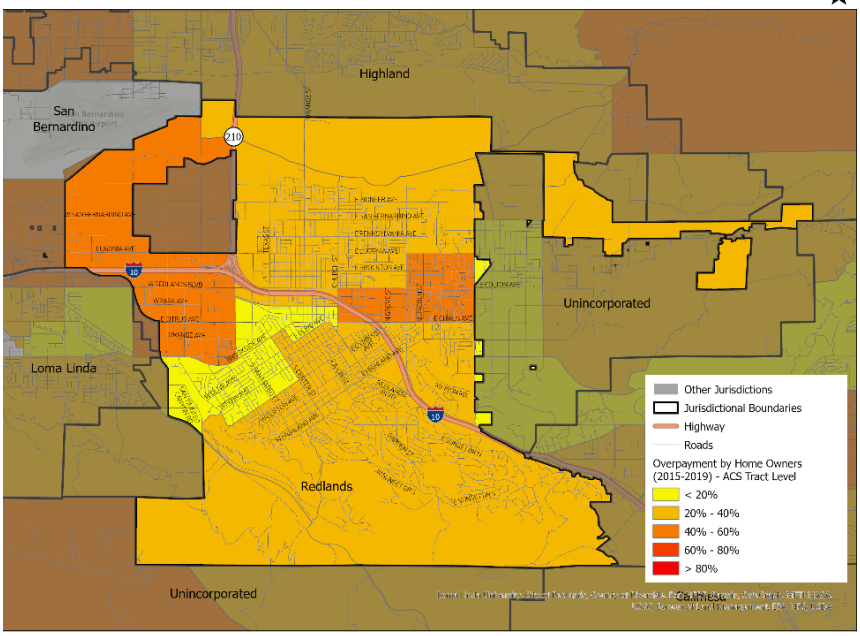
Source: HCD AFFH Mapping Tool.

Figure 7-29 displays the percentage of homeowners that are experiencing a cost burden by census tract from 2010-2014 and 2015-2019. A significantly smaller number of homeowners experience cost burden compared to renters. There are no tracts in the City where over 60% of homeowners experience a cost burden, and only three tracts in the City fall in the 40%-60% range. A few tracts in the western part of the City saw a decrease in cost-burdened homeowners over time.

FIGURE 7-29: OVERPAYMENT BY HOMEOWNERS, 2010-2014 AND 2015-2019



Overpayment by Homeowners, 2010-2014



Overpayment by Homeowners, 2015-2019

Source: HCD AFFH Mapping Tool.

Table 7-9 reveals the trends relating to cost burden and race. Compared to the overall population of the City of Redlands, the percentage of households with cost burden that are White or Asian is lower than the percentage of total households that are White or Asian in the City. However, the percentage of households with cost burden that are Black, Native American, Hispanic, and Pacific Islander is much larger than the percentage of those ethnicities that comprise the overall population, meaning that these races are disproportionately experiencing cost burden and housing costs requiring too much of their total income.

TABLE 7-9: COST BURDEN BY TENURE AND RACE

	White	Black	Asian	Am Ind	Pac Islander	Other	All	Hispanic
Redlands Total with Cost Burden	4,390	655	465	55	40	165	8,210	2,440
	53.5%	8.0%	5.7%	0.7%	0.5%	2.0%	100.0%	29.7%
Owner-Occupied	1,945	100	215	15	15	65	3,340	985
	23.7%	1.2%	2.6%	0.2%	0.2%	0.8%	40.7%	12.0%
Renter-Occupied	2,445	555	250	40	25	100	4,870	1,455
	29.8%	6.8%	3.1%	0.5%	0.3%	1.2%	59.3%	17.7%
All Households	28,392	3,870	5,729	332	147	5,346	71,830	23,261
	39.9%	5.4%	8.1%	0.5%	0.2%	7.5%	100.0%	32.7%
San Bernardino County Total with Cost Burden	81,845	29,200	16,335	925	490	1,969	132,214	1,450
	61.9%	22.1%	12.4%	0.7%	0.4%	1.5%	100.0%	1.1%
Owner-Occupied	44,780	7,845	10,375	490	155	1,965	66,195	585
	33.9%	5.9%	7.9%	0.4%	11.7%	1.5%	50.1%	0.4%
Renter-Occupied	37,065	21,355	5,960	435	335	3,915	69,930	865
	28.0%	16.2%	4.5%	0.3%	0.3%	3.0%	49.9%	0.7%
All Households	169,364	179,292	154,332	17,782	6,838	368,600	2,149,021	1,145,874
	7.9%	8.3%	7.2%	0.8%	0.3%	17.2%	100.0%	53.3%

Source: HUD CHAS 2013-2017.

Note: Data excludes households with two or more races.

At the County level, the percentage of households with cost burden that are White, Native American, or Pacific Islander is comparable with the percentage of total households that are White or Native American in the County, revealing a higher proportion of White households with cost burden and a lower proportion of Native American or Pacific Islander households with cost burden than in the City of Redlands. Like the City, the County has a much larger percentage of cost-burdened Black households than would be expected by their population. Unlike the City of Redlands, where Asian households make up proportionately less of the cost-burdened population than the overall population, at the San Bernardino County level, they make

up almost twice the proportion and are overwhelmingly disproportionately cost burdened. Also different from Redlands is the Hispanic population, which makes up a large overall proportion of the population in the County but a very small proportion of cost-burdened households.

An elderly household is a household where either the head of the household is over 62 years of age or there are two people over 62 years of age in the household. In the City of Redlands, elderly households make up 18% of the overall population, but 27% of households with cost burden; Countywide, elderly households make up 12% of the total population, but 41% of the households with cost burden. This disproportionate representation, shown in Table , may be due to how many elderly households may have acquired their home when employed and now are living on a fixed salary (e.g., from Social Security), thus creating a cost burden.

Large households are considered households with three or more children, whether there is one present parent or two, but are often also measured as households with over five people. The table below reveals that despite large households making up only 7% of the overall population in the City of Redlands, they make up 22% of the households with cost burden. County-wide, large households make up 10% of the population, but 33% of the households with cost burden. Large households may need a larger home to accommodate the number of people in the family, and because larger-sized homes may have higher costs (rent/mortgage, utilities, etc.), it may take more of a person's income to maintain, thus creating a cost burden.

TABLE 7-10: COST BURDEN FOR ELDERLY AND LARGE HOUSEHOLDS BY TENURE

With Housing Problem	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	All HH
City	975	629	1,604	1,207	280	1,487	3,091
County	19,895	25,515	45,410	33,745	18,420	52,165	97,575

Source: HUD CHAS 2013-2017.

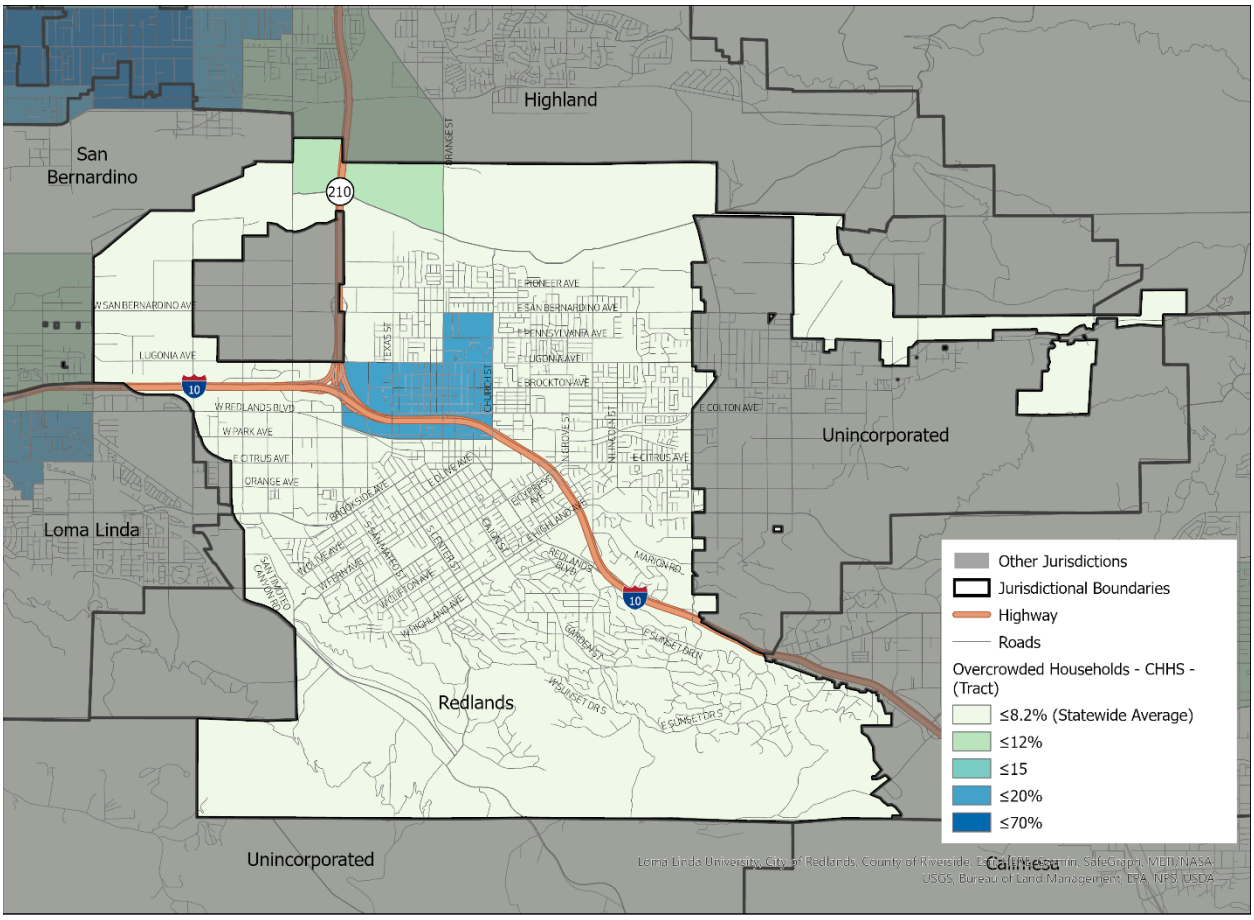
7.3.6.3 Overcrowding

A household is considered overcrowded if there is more than one person per room, including dining and living rooms but excluding bathroom and kitchen. Overcrowding is considered one of the four major identified housing problems by HUD.

In the City of Redlands, the area with the most severe overcrowding corresponds with the tract with high segregation and poverty, as shown in Figure 7-30, which follows trends in housing choice voucher usage, less economic opportunity, and a high percentage of the population in low to moderate income levels. This area is also a predominantly Hispanic community. While it may be assumed that overcrowded households would correlate with families, this area has less children living in married couple households compared to the rest of the City, and a higher quantity of people living alone. It does, however, have a higher number of children in female- or single-parent headed households.

Per the 5th Cycle Housing Element, there is a history of low-income households being more overcrowded due to scarce housing resources, which is consistent with what is known of the identified area. In the San Bernardino County region as a whole, areas of overcrowding are isolated, but continue in areas with similar characteristics to that in Redlands, such as the areas of older downtown housing in other cities and the industrial area in the City of San Bernardino surrounding the San Bernardino Airport.

FIGURE 7-30: DISTRIBUTION OF OVERCROWDED HOUSEHOLDS, 2010, REDLANDS



Source: HCD AFFH Mapping Tool.

7.3.6.4 Homelessness

Persons experiencing homelessness and unhoused individuals are groups who experience disproportionate housing needs. The San Bernardino County Homeless Partnership, in collaboration with the San Bernardino County Office of Homeless Services and the Institute for Urban Initiatives, conducts an annual count of the population experiencing homelessness, known as the Point In Time Count (PITC). Table displays the PITC for Redlands for the years 2013 and 2020 and the change over time. The 2020 PITC accounted for 186 individuals experiencing homelessness in Redlands. From 2013 to 2020 homelessness tripled in the City, increasing from 62 to 186 individuals. Concentrations of the homeless population are in the downtown area where issues like overcrowding and overpayment are prevalent.

TABLE 7-11: CHANGE IN POPULATION EXPERIENCING HOMELESSNESS, 2013 - 2020

Characteristic	2013	2020	% Change
Total Homeless	62	186	300%
Sheltered	15	45	300%
Unsheltered	47	141	300%
Transitional Housing	1	-	-100%
Male	36	71	81%
Female	9	22	211%
Chronic Homeless	9	59	655%
Families (Including Chronically Homeless Families)	1	-	-
Persons with Mental Health Problems	13	30	230%
White, non-Hispanic	27	52	192%
Black, non-Hispanic	5	12	240%
American Indian and Alaskan Native, non-Hispanic	4	2	-50%
Asian, non-Hispanic	-	1	-
Native Hawaiian and Other Pacific Islander, non-Hispanic	-	-	-
Multiple Races or Other	3	26	867%
Don't Know/Refused	-	-	-
Hispanic/Latino	6	26	433%

Source: San Bernardino County Homeless Partnership 2013 and 2019 Point In Time Counts.

Table 7-12 displays the 2020 PITC for Redlands in comparison with neighboring jurisdictions and the whole of San Bernardino County. The City of San Bernardino has a significantly higher population experiencing homelessness than other cities in the region at 1,056. Redlands has the second highest count. The 2020 PITC report notes that two-thirds of the population experiencing homelessness were counted in six cities in the County: Fontana, Ontario, Redlands, Rialto, San Bernardino and Victorville.[27]

[27] 2019 San Bernardino County Homelessness County and Subpopulation Survey Final Report. https://wp.sbcounty.gov/dbh/sbchp/wp-content/uploads/sites/2/2019/05/2019-homeless-count-and-survey-report.pdf.

TABLE 7-12: REGIONAL POINT IN TIME COUNT, 2019

Jurisdiction	Sheltered	Unsheltered	Total
Redlands	45	141	186
Highland	0	78	78
Loma Linda	24	27	51
City of San Bernardino	233	823	1,056
Yucaipa	4	13	17
San Bernardino County	735	2,390	3,125

Source: San Bernardino Partnership 2019 Homelessness Count and Subpopulation Survey Final Report.

7.3.6.5 Displacement Risk

The Urban Displacement Project at University of California, Berkeley developed a map of communities where residents may be particularly vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost, known as sensitive communities.[28] Sensitive communities are defined based on the following set of criteria:

- The share of very low-income residents is above 20%.

The tract must also meet two of the following criteria:

- The share of renters is above 40%.
- The share of people of color is above 50%.
- The share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median.
- The areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as:
    - The percentage change in rent above county median for rent increases OR
    - The difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Figure 7-31 displays the areas of the City determined to be sensitive to displacement as determined by the Urban Displacement Project. It includes the northwestern and central census tracts. There is very little housing in the western region of the City north of the I-10 freeway and west of Highway 210 and no land there is zoned for residential use.

[28] UCB Sensitive Communities Project.

The citizen anti-growth initiatives in the 1970s, 1980s, and 1990s restricted development and placed a series of regulatory and procedural burdens on multifamily housing. It is unknown the extent to which this discouraged and deterred development in Redlands. Few new higher-density multifamily developments have been approved in Redlands in the past three decades, with the exception of Luxview Apartments (in 2019) in the southwest region of the city, the Liberty Lane affordable housing project in the central census tract (2018), and Casa Loma Apartments (in 2020) near the university in the eastern region of the city. The large capital investment in the three new Metrolink passenger rail stations and the smart growth compact mixed-use development around each station are expected to provide more multifamily housing and higher-density housing options and transform the areas over the next 10 to 20 years. There is development interest for increased density near transit stops, as well as for housing to be built in underserved communities so people may continue to live in their community and not have to leave to gain access to affordable housing.

Displacement from Transit-Oriented Development

Fortunately, the largely vacant and underutilized lands around the train stations will permit significant infill and redevelopment with minimal displacement of existing residents. Redevelopment of residential sites (if any) will require advanced notification of tenants, and right of first refusal to occupy replacement of affordable units. Residents with housing choice vouchers will be able to relocate to other units in the area. The planned urban form will increase housing, services, recreation, and employment opportunities in the area. As such, any displacement risk with the development of new housing and with the selection of RHNA sites is anticipated to be minimized. In recent cases where some single-family residences (Ruiz Street) have been replaced with nonresidential development, developers entered negotiations with owner-occupied property owners. These negotiations resulted in market-competitive cash offers that enabled residents to relocate without hardship.

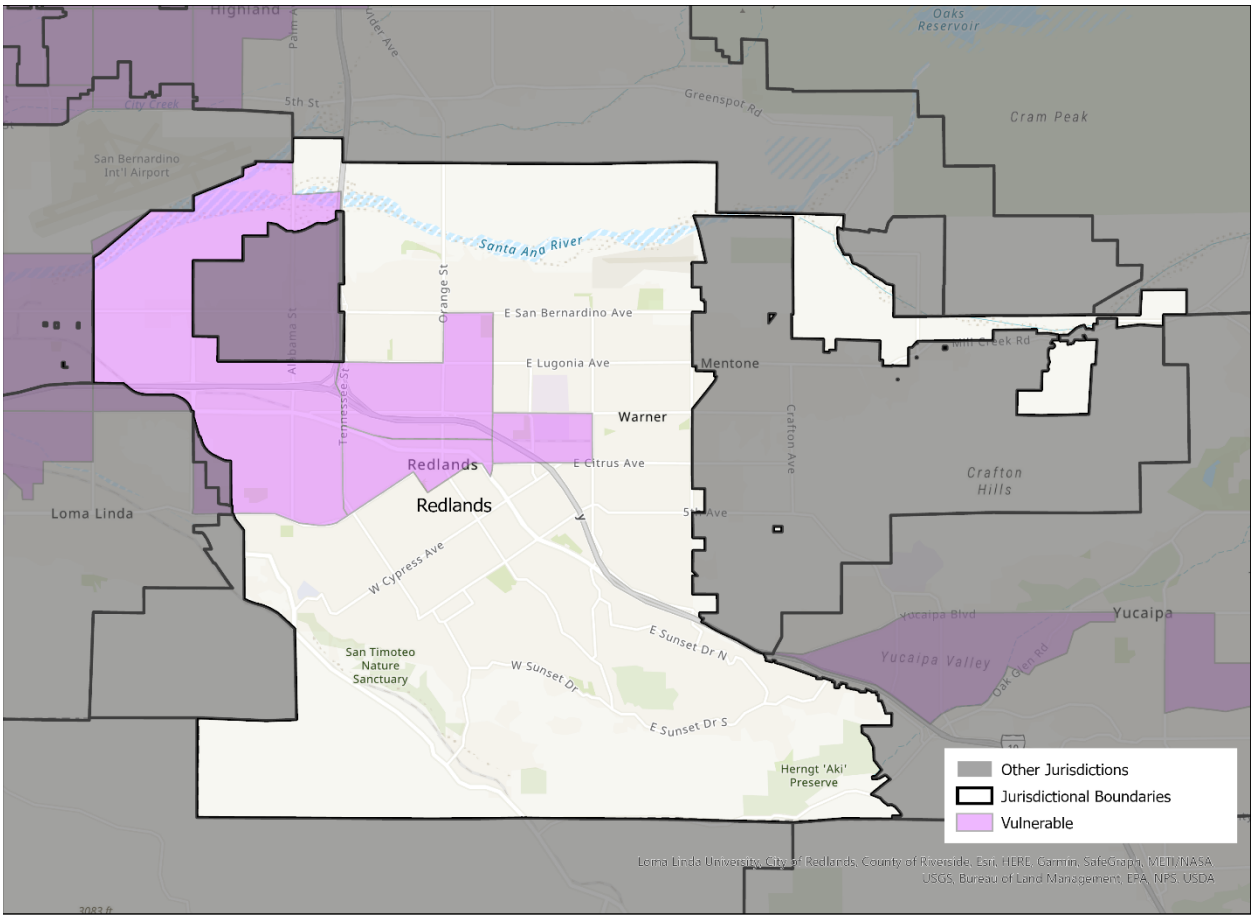
Areas north of I-10 zoned R-1 and within the half-mile of the downtown train station has been excluded from rezoning under the TVSP with the intent of not inducing displacement. Only commercially zoned parcels will undergo zone/development standard updates under the TVSP. Additionally, to take further steps against displacement, the City has included programs addressing displacement such as Program 1.2-20 Extending Affordability Covenant terms from 55 to 99 years and Program 1.3-9 facilitating the Tenant Protection Act (2019).

Implementation of the TVSP will also address overlapping issues with access to opportunity and disproportionate housing needs in that the TVSP will facilitate the creation of new housing, jobs, resources, and means of transportation within an area of low displacement risk.

Displacement from Environmental Hazards

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

FIGURE 7-31: COMMUNITIES SENSITIVE TO DISPLACEMENT, 2017, REDLANDS



Communities Sensitive to Displacement

0 0.5 1 2 Miles

Source: HCD AFFH Mapping Tool.

7.3.6.6 Findings

Trends in disproportionate housing needs show the following:

- Renters experienced greater housing cost burdens than homeowners
- Overcrowding above the State average occurs downtown, including the same census tract that is identified as high segregation and poverty
- Large households are the most likely to experience housing problems

Contributing factors to fair housing issues pertaining to disproportionate housing needs include lack of availability of affordable units for low-income households and historic land use and zoning practices. These will be addressed by the TVSP. Promoting the plan to property owners and affordable and market rate housing developers can help increase housing that will be built near the new transit stops. The City will also fund three beds as stated in Program 1.3-8 Homeless Assistance Program.

7.3.7 Other Contributing Factors

Other contributions that effect the accumulation of wealth and access to resources include historic disinvestment, lack of infrastructure improvements, ballot growth measures, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

Environmental Justice

The City has several industrial uses throughout and has identified zoning for these uses. The organization of the zoning pattern generally keeps industrial type uses separated from residential uses. Where industrial and residential are proximate, the City limits industrial activities to "light industrial" uses in order to limit environmental impacts on neighboring zones.

The establishment of I-10 has created a corridor through the middle of the City where neighboring areas are affected by pollution such as diesel particulate matter. The City implements best practices when reviewing land use developments within 500 feet of I-10 to limit pollution exposure. It does this by conditioning projects to install HVAC systems that have the ability to filter these pollutants. Where possible, noise barriers have been installed along 1-10 to shield residences from freeway noise. While noise barriers are typically installed and maintained by Caltrans, the City has supported private development projects that seek to beautify and enhance freeway right-of-way such as the Packinghouse District and the Orange Street I-10 eastbound off ramp.

History of Growth Management Land Use Measures

The City's first growth management initiative was 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.

Proposition R was amended by Measure N (a zoning ordinance) in 1987; this policy restricts the development of residential dwelling units to 400 units a year within the city, and the extension of utilities

to 150 units per year outside the existing city limits (within the Sphere of Influence, and therefore in the County of San Bernardino's jurisdiction). Of the 400 units within the city, 50 are, by resolution, reserved for single-family homes, duplexes, triplexes and four-plexes on existing lots; the remainder are allocated on a point system (adopted as Ordinance No. 2036), which emphasizes design amenities. However, as noted in the State Law Preemption section below, these provisions have been rendered null and void while SB 330 is in effect. The City Council adopted Resolution 8082 in 2020 suspending enforcement of the annual building permit limit as long as SB330 is in effect.

Measure U, adopted by the voters in 1997, further articulated growth management policies. This General Plan Amendment reinforced and modified certain provisions of Measure N, adopted Principles of Managed Growth, and reduced the development density of San Timoteo and Live Oak canyons by creating a new land use category: Resource Preservation. This particular aspect of Measure U has a negligible effect on the ability of the City to accommodate future residential development because it concerns an area of the city with steep hillsides, natural resources, no sewer service and limited utility infrastructure, and other conditions that would limit the development potential of this part of Redlands, regardless of governmental controls.

In addition, under Measure U, no land designated by the General Plan as Urban Reserve as of June 1, 1987, is to be redesignated for a higher density than the R-E designation as the same existed on June 1, 1987 unless specified findings are made by a four-fifths vote of the City Council.

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

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

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

Measure U, although not demonstrated with previous project approvals, could in theory potentially restrict the City's ability to meet its housing needs obligations, and restricts multi-family housing development through the requirement of a 4/5 vote of the City Council for densities above 18 du/ac or

housing products greater than two and half stories in height. Additionally, the 75 percent single family to 25 percent multi-family ratio identified in the City's General Plan via Measure U would, in theory, preclude the City from meeting its RHNA. However, during the time that SB 330 is in effect (likely through 2030), the City cannot enforce the 75/25 ratio target, reducing this constraint on the City's ability to meet its RHNA.

Measure U provides for an exemption for development "directly related" to the three rail stations being developed and scheduled to open in Redlands in 2022: the New York Street station near the Esri campus which is the City's largest employer; the downtown station; and the University of Redlands station. If a development project is determined to be exempt from Measure U, then the development is not subject to the aforementioned requirements. This exemption process includes a determination by the City Council that a proposed development is "directly related" to the rail station. In making this determination, the City Council has utilized the following two criteria:

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

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

The growth management initiatives may have played a role in the manner and extent of housing development in the City which has generally resulted in a furthering of suburban land use patterns with more expensive single-family Planned Residential Development being the primary housing product being developed during the 5th Cycle. Even so, the City has recently seen renewed interest in higher density housing production and is operating within the limits of these voter approved measures to allow taller and more dense housing in various parts of the City.

Measure U and the City's growth management voter initiatives are more fully discussed in Section 4.1 – Governmental Constraints.

Spatial Patterns of Segregation There is no indication of historic redlining in Redlands, and none is shown on the AFFH data viewer tool.[29] However, records from the County Recorder of San Bernardino County show the use of racially restrictive covenants in the City until the 1940s in southern Redlands near the Country Club. The use of racially restrictive covenants shaped patterns of segregation and integration across Redlands, limiting some areas to White only residents.

Additionally, physical barriers were inadvertently created between North Redlands (former Lugonia Colony) and South Redlands (former Redlands Colony) by first the Zanja water course, followed by the Santa Fe Railroad, and most dramatically by Interstate 10.[30] This division, which initially began between rival colonies attempting incorporation, has played out over the decades with a perceived lack of

[29] California HCD AFFH Data Viewer Tool. Redlining Grade Layer.
[30] *Little Racial Strife Seen*, Daily News. August 28, 2017. https://www.dailynews.com/2011/01/16/little-racial-strife-seen/

infrastructure and investment in North Redlands.[31] An inadvertent exacerbation came about in the latter 1950s when the police and fire departments for service purposes divided the city up and simply replaced Lugonia with "Northside".[32] The Report on Redlands Community Vision contains a section on the "north side" in Appendix A which summarizes outreach and engagement feedback.[33] The report documented "community members can make complaints at the commission meetings – sometimes related to north-vs.-south division in the city. Before city developed, there were really two cities. There was a perception that poorer people live on north side. The cultural mix on the north side has historically been different, and there are issues dating back to days of segregation. The Human Relations Commission works to educate people on these issues, and build more unity and acceptance. In recent years, the City has tried to have as much public access to planning as possible to help address this rift." The report goes on to document comments by residents of the need for improved infrastructure and dedicated resources such as a library and public computer access. The City's Historic Context Statement offers additional insight to early divisions between then Lugonia and Redlands colonies, quoting a local historian "It seems incredible to us now that there should have been so much jealousy and ill-feeling between Lugonia and Redlands. For some time, they felt that they were two separate towns and the section on Orange Street between the zanja and Pearl Avenue was called "the link." It was all natural enough. Lugonia was well established with many attractive features and it was hard to see the trend in population and business moving so definitely away from them. On the other hand, Redlands, with youthful enthusiasm was out to capture the business center, the tourists, and everything else it could.[34] Over the years this sentiment has dwindled and both portions of the City have become more diverse. Through vision planning and comprehensive planning efforts, the City has made great efforts to direct resources where they are needed.

Portions of this area are included in the TVSP. The City is working to increase infrastructure investment and redevelopment in this area with the TVSP.

In 2015, the City interviewed business owners at the prominent North Redlands intersection of Orange Street and Colton Avenue (during the I-10 on-ramp/off-ramp beautification project) to ascertain what actions could improve the immediate area. Most respondents indicated the need for police surveillance cameras at the intersection to enhance public safety, and the City successfully coordinated with Caltrans to install additional cameras. There are three primary underpasses that connect North and South Redlands under elevated portions of I-10 (at Sixth St., Orange St., and Eureka St.), and the City has cleaned and revitalized each of them with new lighting, paint, and mural installations to signify the connection and promote the safe passage of pedestrian traffic. In addition, the draft TVSP includes the corridors along Colton Avenue (north and east of I-10) and North Orange Street (from I-10 to Lugonia Avenue) to improve and enhance the connectivity and aesthetic of North Redlands to the downtown area.

[31] Report on Redlands Community Vision, 2006. Dyett and Bhatia. https://www.cityofredlands.org/sites/main/files/file-attachments/report-on-community-vision_12june2006.pdf?1554324291

[32] *The City's Image Comes Hard,* Larry Burgess, Ph.D. October 31, 2002. http://www.redlandsfortnightly.org/papers/burgess02.htm.

[33] Report on Redlands Community Vision, 2006. Dyett and Bhatia. https://www.cityofredlands.org/sites/main/files/file-attachments/report-on-community-vision_12june2006.pdf?1554324291

[34] City of Redlands Citywide Historic Context Statement. Adopted September 19, 2017. https://www.cityofredlands.org/sites/main/files/file-attachments/reso_7782_with_hcs.pdf?1554319748

In recent years, the City has sought to construct infrastructure improvements incrementally throughout the entire jurisdiction. The City has allocated CDBG funds to repair and pave alleys, repair and rehabilitate public park facilities, and fund service providers who focus their efforts on the northern side of the City. Many Redlands streets were repaved under the City's PARIS (Pavement Accelerated Repair Implementation Strategy) program, including North Redlands, over several years as funding became available. The City has installed LED streetlights, established a Community Center, and has bolstered efforts to install new landscape and artwork improvements in some major corridor medians.

7.3.8 Summary and Explanation of Sites Inventory on Fair Housing:

A substantial portion of the sites planned for the lower- and moderate-income RHNA are located within census tracts with identified fair housing issues, leading to a potential concentration of poverty and additional fair housing issues. While the opportunity indicators show that the selected sites have a potential to create over-concentrations of lower-income residents, the inventory was specifically developed to locate high-density residential uses in areas of high opportunity, regardless of the TCAC or CalEnviroScreen score. This is part of a larger smart growth strategy to concentrate future growth around the three new Metrolink and Arrow passenger light rail stations in compact, mixed-use, walkable communities. This makes the most efficient and cost-effective use of existing essential infrastructure. Infill and redevelopment will enhance the public realm and increase amenities, services and employment opportunities that will benefit the immediate and adjacent neighborhoods as well as the entire City. The TVSP will also increase the number and type of housing options for a broad range of housing types, sizes, and incomes, leading to a more diverse, dynamic, and cohesive community. Residents in the future transit villages will have convenient access to many nearby household services and transportation options and will not necessarily be required to own a motor vehicle to access household needs or places of employment. Despite being identified in current maps as areas with lower opportunity, the new Metrolink Stations and TVSP will transform central Redlands into an area of high opportunity, with excellent access to employment, transportation, public amenities, healthcare, and retail destinations.

Most notably, the City identified many sites within immediate proximity to the new Metrolink stations. These sites are within the TVSP, which will update zoning to allow for high-density residential and mixed uses. Combined, the direct infrastructure investment of the Metrolink stations and more permissive zoning would catalyze redevelopment of underutilized commercial land and improvement in historically low resource areas. Additionally, these areas have pending/approved market-rate pipeline projects, adding diversity to the housing stock and income levels in central Redlands, as well as helping to stabilize neighborhood rents through additional housing options. Adoption of the TVSP is included in Program 1.1-3 and Program 1.5-8 serves to provide investment in historically underserved areas within the TVSP.

Properties outside of the TVSP were also selected based on access to employment, grocery stores, parks, and schools. Properties within the East Valley Corridor Specific Plan, which is accommodating a large number of lower and moderate-income units, have excellent access to employment centers at Esri and the neighboring Loma Linda University.

Additionally, the City is including programs to ensure that the sites inventory affirmatively furthers fair housing and provides increased access to opportunity, investment in historically underserved areas, and

contributes to increased housing opportunity and a broader equitable quality of life throughout the community. Programs include facilitating the Tenant Protection Act (Program 1.3-9), a continued contract with a fair housing provider and expanded fair housing outreach in communities with disproportionate needs (Program 1.5-2, Program 1.5-4), incentivizing units in areas trending towards RCAAs including southern Redlands through ADUs and SB9 (Program 1.6-1), and removal of a CUP for developments with more than 35 units (Program 1.2-13).

7.4 IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

Table 7-13 displays the contributing factors from the AFFH analysis, their fair housing issues, priority level and meaningful actions included in the Implementation Plan to address them. The City has adopted goals and actions to address the contributing factors identified through the AFFH analysis. Many of the RHNA sites are located in the TVSP area, which includes part of the area of high segregation and poverty. The TVSP is expected in improve resources in this area and provide significant investment into an area with a greater diversity, more environmental risk, and greater poverty. The City is also including outreach programs to address a potential community opposition to housing and improve outreach in communities with disproportionate housing needs. Other programs directed to fair housing include the continuation of the mobile home rent control ordinance, preapplication fee waivers for affordable housing developments and adoption of an inclusionary housing ordinance.

While the City views all contributing factors as an important priority to address, in determining the level on the table higher priority was given to factors that limit fair housing choice and or negatively impact fair housing, per Government Code section 65583(c)(10)(A)(iv).

TABLE 7-13: IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

Fair Housing Issue	Contributing Factor	Meaningful Actions	Priority
Outreach Capacity	Lack of monitoring Lack of awareness of fair housing services Lack of a variety of media inputs Lack of marketing community meetings	Continue to contract with a fair housing service provider to provide fair housing services to residents of Redlands over the 2021-2029 planning period. As part of its scope of work, increase outreach and education including a required fair housing workshops to be conducted in the downtown/central part of the City identified with disproportionate housing needs and displacement risks. (See Programs 1.5-2 Coordinate with IFHMB, 1.5-3 Promotion of Fair Housing Information, and 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs) Expand outreach and education of the State's new Source of Income Protection (SB 329 and SB 222), (See Program 1.3-6 Outreach and Education.) Include HCVs as legitimate source of income for housing. (See Program 1.5-11.) Require evidence of effective outreach from Fair Housing Provider on an annual basis. City will	Low

Fair Housing Issue	Contributing Factor	Meaningful Actions	Priority
		require attendance reports to events from fair housing providers. Based on reports, work with fair housing provider on plan to increase attendance to outreach events. (See Programs 1.5-2 Coordinate with IFHMB, 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs, and 1.5-5- Fair Housing reporting)	
Segregation Patterns	Concentration of minority populations in downtown area of City Geographic (North/South and regional) segregation by race/ethnicity and income Concentration of availability of appropriate housing types for housing choice vouchers like affordable rental units maintained by private owners Historic land use and zoning practices	Annually,- prioritize any disadvantaged or environmental justice community areas such as the downtown/central census tracts, for actions and improvements. (See Programs 1.5-1 Place-Based Improvements) Promote key lower income housing opportunity sites for affordable housing development particularly in the TVSP, as a means to bring new housing opportunities in high resource areas. (See Program 1.1-3 TVSP) Provide written letters supporting funding applications by nonprofit developers for affordable housing in high resource areas. (See Programs 1.2-14 Waive Preapplication Fees for Affordable Housing Projects, 1.5-8 Residential Development in High Opportunity Area, and 1.5-10 NOFA/Nonprofit Housing Development) Study and implement an inclusionary housing ordinance to encourage low-income housing development (See Program 1.3-2). Removal of CUP requirement for developments with more than 35 units (See Program 1.2-13).	Medium

Fair Housing Issue	Contributing Factor	Meaningful Actions	Priority
Access to Opportunity: Area of High Segregation and Poverty	Lower environmental quality in census tracts Community opposition to new development	Adopt and implement the TVSP. Promote the plan to property owners and affordable and market rate housing developers. (See Program 1.5-8 Residential Development in High Opportunity Area and 1.1-3 TVSP) Address community opposition through outreach programs (See Program 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs and ADU Outreach in Program 1.6-1)	High
Disproportionate housing needs	Lack of availability of affordable units for low-income households Historic land use and zoning practices	Adopt and implement the TVSP. Promote the plan to property owners and affordable and market rate housing developers. Use the EIR for the TVSP to expedite housing projects that are consistent with the specific plan. (See Program 1.5-8 Residential Development in High Opportunity Area and 1.1-3 TVSP) The City will fund three beds as stated in Program 1.3-8: Homeless Assistance Program	High
Displacement	Increasing rents Displacement risk due to economic pressures	As part of the project application review, require applicant to provide advance noticing to existing tenants. (See Programs 1.4-1 Preservation of at Risk Housing and 1.4-2 Rehabilitate and Improve Condition of Existing Affordable Housing Stock) Focus fair housing outreach and education on areas with high displacement risk (downtown/central census tracts identified as a sensitive community and tracts identified as disadvantaged communities). (See Program 1.5-4 Expand Fair Housing Outreach in Communities with Disproportionate Needs) Continue implement the Mobile Home Rent Control Ordinance (See Program 1.5-9) Implement a ban on no-fault evictions (See Program 1.1-1)	Medium