

**City of Redlands**  
**REQUEST FOR PLANNING COMMISSION ACTION**

**Planning Commission**

**Agenda Item NO. 5. B.**

**Meeting Date:** 05/25/2021

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**APPLICANT:**

City of Redlands, Development Services Department  
(Project Planner: Catherine Lin, Principal Planner)

Update to the Planning Commission and study session on the 2021-2029 Housing Element Update including potential sites for the “Regional Housing Needs Assessment” inventory. This project is subject to the California Environmental Quality Act (CEQA), and an Initial Study will be prepared.

**BACKGROUND**

On April 13, 2021, the project team presented to the Planning Commission the first study session on the Housing Element Update. The study session covered the content of the Housing Element, the Regional Housing Needs Assessment (RHNA) requirement, minimum housing density requirements for each income category, a web based map showing the locations of potential RHNA sites, an overview of the public outreach process, as well as the timeline for the project. Please see [Attachment A](#) for the staff report and presentation slides prepared for the April 13 study session for further background information.

As the Housing Element Update is a work in progress, with this study session, staff will provide an update on the RHNA site selections and outline a more refined approach to fulfilling the City’s RHNA obligations, as well as provide a summary of the public input received through various public outreach efforts.

**SUMMARY**

**A) RHNA Site Inventory**

The housing sites inventory is still a work in progress. As feedback is being received and additional analysis being completed, the project team is making appropriate revisions to the RHNA site inventory.

The RHNA allocation is a “planning target” that the City is required by law to fulfill by identifying enough land that is available for housing development for all income categories. It is not a building quota, and the City is not required to build any housing developments. The City is only required to identify enough land area and ensure that the sites have proper zoning for residential development, however, the City is not required to enforce that the units are built.

Development on RHNA Site Selections and Assumptions

As presented at the April 13, 2021, Housing Element Update study session, SCAG has allocated 3,516 RHNA units to the City of Redlands. This means that the City is required to identify and zone enough land to accommodate 3,516 units of new housing for the 2021-2029 Housing Element planning period.

Of that total, 967 units are for the very-low income category, 615 units are for the low income category, 652 units are for the moderate income category, and 1,282 units are for the above moderate income category. Staff had also discussed that there is a 71-unit carryover RHNA from the current (5th) cycle of Housing Element due to the fact that a site that was previously listed had become unavailable for housing development. However, after further analysis, the project team determined that since the City has

maintained adequate RHNA sites for housing development throughout the 5th cycle planning period, the City will not be required to carry over units to the 6th cycle. Therefore, the City's RHNA allocation would stay at 3,516 units instead of 3,587 units ( $3,516 + 71 = 3,587$ ) as presented at the last study session.

As presented at the April 13 study session, there are more than enough sites throughout the City to fulfill the RHNA allocation. Also discussed at the first study session was the fact that a number of the sites will require a General Plan Amendment, Zone Change, or Specific Plan Amendment to make residential the primary allowable use, which is required by state law. Therefore, by having a surplus of land as potential RHNA sites, the City can choose among the sites that are most suitable for housing development based on objective criteria (such as proximity to transit, schools, parks, grocery stores, various services, or jobs), as well as comments received from members of the public, the Planning Commission, and the City Council. The City will not need to rezone all the sites identified, but only select enough of the sites that are most suitable for housing development to fulfill the City's RHNA allocation.

The sites have been mapped on a web based map ([click here for the link](#)) which is also available on the City's Housing Element Update website (<https://www.cityofredlands.org/post/housing-element-update>). The RHNA sites are dispersed throughout the City to avoid over-concentrating housing in a particular area, but they can generally be grouped into the following four locations:

1. Transit Villages Specific Plan (TVSP) area
2. East Valley Corridor Specific Plan (EVCSP) area
3. North Redlands by Citrus Valley High School
4. The remainder of the sites

#### Removal of Parcels from Citrus Valley High School Grouping of Properties

At the first study session, the Planning Commission voiced concerns regarding loss of existing commercially zoned land in North Redlands by the Citrus Valley High School. While the Planning Commission understands the City's legal obligation to identify sites for RHNA, the Commission also emphasized the importance of preserving sufficient commercial land for the City's long-term economic vitality. Therefore, the project team has removed two large parcels from this group.

#### Lowering the Calibration Factor for Sites within the TVSP Area

After the first study session with the Planning Commission, the project team had an opportunity to meet with representatives from the California Department of Housing & Community Development (HCD) and received valuable comments. One of the questions that was raised concerned the calibration factor for the proposed TVSP area. HCD requests that cities apply a calibration factor for mixed-use zones since it is reasonable to anticipate that a site will not be developed 100% as a housing project, and that the actual development yield for housing units on a parcel that has mixed-use zoning is typically a fraction of a residential site of the same size.

At the time of the first workshop, the project team had applied a 70% calibration factor for the potential RHNA sites within the TVSP area. However, HCD strongly recommends a 50% calibration factor for mixed use areas. Therefore, the project team has adjusted the calibration factor for sites within the TVSP area from 70% to 50%.

#### Updated RHNA Inventory Table

After making the revisions mentioned above, the City still maintains a surplus of potential RHNA sites. As discussed at the first study session, a 20% buffer has been applied to the RHNA allocation for each income category. The purpose of this practice is to identify more than enough sites (by 20%) in order to avoid the need to rezone for future replacement sites if identified RHNA sites are developed for non-housing purposes. Table 1 is the updated number of dwelling units on potential housing sites, by income category.

Table 1. Number of Dwelling Units on Potential Housing Sites, by Income Category.

	<i>Low &amp; Very Low Income</i>	<i>Moderate Income</i>	<i>Above Moderate Income</i>	<i>Total Units</i>
RHNA Requirement (with 20% buffer)	1,898	782	1,538	4,219
Dwelling Unit Capacity on Identified Sites	3,375	1,150	223	4,748
Accessory DUs (or "ADU")	69	42	9	120
Recently Entitled Projects	80		564	644
Pending Projects			1,134	1,134
Total Identified Capacity	3,524	1,192	1,930	6,646
<b>Surplus Identified Capacity</b>	<b>1,626</b>	<b>409</b>	<b>392</b>	<b>2,427</b>

Overall, the City has identified 169.3 acres of land for low and very-low income housing development, 95.7 acres of land for moderate-income housing development, and 196.4 acres of land for the above-moderate income housing development. The above-moderate income RHNA inventory includes 152 acres of recently entitled housing projects, housing projects in the process of being entitled, and housing projects that are anticipated to be entitled in the near future. Please see [Attachment B](#) for the complete list of the draft RHNA inventory sites by income levels.

Most of the sites identified are vacant or underutilized. This inventory includes 136 acres (a decrease from 157 acres) of land for which a General Plan Amendment, Zone Change, or Specific Plan Amendment will be required in order to make residential use the primary permitted use on those parcels.

## **B) Focused Discussion on Draft RHNA Sites by Location**

### 1) TVSP Area

The TVSP area is a high opportunity area as it is the home of future high quality transit in the City. As the City anticipates the completion of the three train stations by Downtown Redlands, the ESRI Campus, and the University of Redlands, the City is actively working on a new Specific Plan to comprehensively guide the future growth of the areas close to the future train stations into lively transit villages with high quality retail, restaurants, entertainment, services, jobs, education, and housing. The Transit Villages Specific Plan that is being prepared is a form-base code that contains design standards for meaningful placemaking, which contribute to building strong communities and furthering of opportunities for

residents and patrons.

A total of 97 acres of land have been identified as potential RHNA sites within the TVSP area. Of the 97 acres, 82.5 acres can accommodate low and very-low income housing at a minimum of 30 dwelling units per acre (DU/acre), 1.2 acres have been identified to accommodate moderate-income housing development between 1 to 30 DU/acre, and 13.3 acres have been identified to accommodate above-moderate income housing between 1 to 12 DU/acre.

Housing development is anticipated to occur in a mixed use format within the TVSP area along with retail shops, restaurants, office space, and other types of uses on the same parcel or within the same building. The availability of high quality transit within close proximity, and the general walkability of the TVSP area, makes this location a prime location for future housing development. Selecting RHNA sites within the TVSP area is also consistent with the Transit Villages Concept of the City's 2035 General Plan. Notable properties in this group includes the Redlands Mall Site and the Tri-City Shopping Center. Please see [Attachment C](#) for a list of sites identified within the TVSP area, and [Attachment D](#) for maps of the sites.

Once the Transit Villages Specific Plan is adopted, these parcels will receive the TVSP zoning as a result of the Specific Plan adoption. Also, the parcels within the TVSP area will not require a General Plan Amendment to accommodate housing in a mixed-use format.

## 2) East Valley Corridor Specific Plan Area

The project team identified 101.5 acres of land within the southern portion of the East Valley Corridor Specific Plan area that are suitable for housing development. This area is located south of Citrus Avenue and north of Barton Road, between Kansas Street to the east and the City limit to the west (approximately 660 feet west of Nevada Street). Common characteristic of the sites identified in this area include vacant sites, sites with outdoor storage of vehicles, and large parcels with a few older single-family homes.

Of the 101.5 acres identified, 47.5 acres were identified for low and very-low income housing development, and 43.4 acres were identified for moderate income housing development. In addition, the recently approved Luxview Apartment project is located in this area and will be counted towards the City's RHNA allocation for the above-moderate income level as an entitled project. Please see [Attachment E](#) for a list of sites identified within the East Valley Corridor Specific Plan area, and [Attachment F](#) for a map of the sites.

This portion of the East Valley Corridor Specific Plan area is suitable for housing development because it is well served by existing schools such as the Montessori in Redlands and Grove High School, which is centrally located in this area. It is also served by the Heritage Park and the Brookside Park. In addition, there is a grocery store in close proximity, and this area is approximately one mile from Redlands Community Hospital. Further, this area is in close proximity to two future train station sites (at California Street and Alabama Street) planned by SBCTA. Also, there is a concrete storm drain channel that serves as a physical buffer from the existing light industrial uses to the north.

The parcels in this group are suitable for housing development because they are generally flat, are between 2 acres to 10 acres in size, most of the sites are regularly shaped, front onto a public street, and they are served by the City's water and sewer services. Finally, there are existing multi-family residential developments (condominiums and apartments) to the immediate south of this area, paving the way for seamless transition of this area into residential neighborhoods over time.

Of the 101.5 acres of land identified in within the East Valley Corridor Specific Plan area, 69 acres will require a General Plan Amendment and Specific Plan Amendment in order to accommodate residential development as the primary use.

## 3) North Redlands by Citrus Valley High School Area

The availability of schools within close proximity is often a top consideration for families in choosing where to reside. This area is generally east of the Route 210 freeway, west of Texas Street, north of West Lugonia Avenue, and south of the Santa Ana River wash. The project team identified 137.8 acres of land suitable for housing development in the area close to Citrus Valley High School. Of the 137.8 acres, 35.4 acres were identified to accommodate low and very-low income housing development, while 30.1 acres have been identified to accommodate moderate income housing development. Furthermore, 4.7 acres of land in this group have been entitled for 80 units of extremely-low income housing (Liberty Lane Apartments), and an additional 67.5 acres are in the process of being entitled for above-moderate income housing.

In addition to its close proximity to Citrus Valley High School, this area is well-served by regional transportation networks, retail centers, parks, and job opportunities. The parcels in this area are regularly shaped and relatively flat, and they are adequately sized for housing development. Furthermore, there are existing residential developments to the east and southeast of this area.

Of the 137.8 acres of land identified in this area, 60.6 acres will require a General Plan Amendment and Zone Change in order to accommodate residential development as the primary use. Please see [Attachment G](#) for a list of sites identified close to the Citrus Valley High School, and [Attachment H](#) for a map of the sites.

#### 4) The Remainder of the Sites

Outside the areas within the TVSP, the East Valley Corridor Specific Plan area, and the areas close to the Citrus Valley High School, the project team identified an additional 88.9 acres of land that is suitable for housing development. Of the 125 acres, 4 acres have been identified to accommodate for low and very low income RHNA (at 30 DU/acre), 21 acres have been identified to accommodate moderate income RHNA (12 DU/acre to 30 DU/acre), and 101 acres have been identified to accommodate above-moderate income RHNA (1 DU/acre to 12 DU/acre). Staff notes that the recently approved Casa Loma Apartment project can be counted towards the City's above-moderate income RHNA allocation and has been included in this group of properties. Please see [Attachment I](#) for a list of these sites.

In selecting these sites, the project team considered the lot size, the existing zoning and use of the site, availability of utility services, and the proximity to schools, parks, grocery stores, government services, jobs, and other services. All of the sites in this group are vacant and appear to be appropriate for potential housing development. Please reference the webmap ( [click here for link](#)) for the locations of these sites.

### **C) Community Meetings**

On April 26 and May 13, 2021, the project team conducted two community meetings to inform the residents of the Housing Element Update and to solicit comments. Due to the Covid-19 pandemic, the community meetings were held virtually, with announcements posted on the City's website and social media platforms in advance to advertise the meetings. Display ads were also published in the Redlands Daily Facts and flyers posted at City Hall. In addition, meeting invitations were sent to individuals who requested to be included in the City's mailing list for the Housing Element Update.

The draft RHNA inventory webmap has been made available on the City's website since April, and the project team have utilized various platforms to inform the residents of the Housing Element Update project, as well as the webmap. The RHNA site inventory was also a focal point of discussions at both of the community meetings. To date, the project team has not received any objections about the selection of any of the potential housing sites.

### **D) Timeframe for General Plan Amendment and Rezoning**

As discussed previously, the draft RHNA inventory includes 136 acres of land that will require General

Plan Amendment, Zone Change, or Specific Plan Amendment in order to accommodate residential as the primary use. According to state law, the city will have up to three years after the adoption of the Housing Element to complete the necessary General Plan Amendment and rezoning actions. The three-year timeframe allows the City adequate time and flexibility to make these land use changes in a programmatic way.

## **ENVIRONMENTAL REVIEW**

The City's consultant will be preparing the environmental review including an Initial Study for the Housing Element Update in the next few months.

## **RECOMMENDATION**

Review the sites in the inventory and provide recommendations as to which sites to remove so that the inventory more closely approximates the RHNA requirements.

## **MOTION**

No motion is required for this item.

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### **Attachments**

Attachment A: Staff Report and Presentation Slides prepared for the April 13 PC Study Session

Attachment B: Complete List of Draft RHNA Inventory Sites by Income Levels

Attachment C: List of Draft RHNA Sites within the TVSP Area

Attachment D: Map of Draft RHNA Sites within the TVSP Area

Attachment E: List of Draft RHNA Sites within the East Valley Corridor Specific Plan Area

Attachment F: Map of Draft RHNA Sites within the East Valley Corridor Specific Plan Area

Attachment G: List of Draft RHNA Sites in North Redlands by Citrus Valley High School

Attachment H: Map of Draft RHNA Sites in North Redlands by Citrus Valley High School

Attachment I: List of Remainder of Draft RHNA Sites

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