REVISED

CITY OF REDLANDS
CITY COUNCIL
SUCCESSOR AGENCY

A G E N D A S

FEBRUARY 1, 2022

PAUL BARICH
Mayor

EDDIE TEJEDA
Mayor Pro Tempore

DENISE DAVIS
Council Member

JENNA GUZMAN-LOWERY
Council Member

MICK GALLAGHER
Council Member
***

JEANNE DONALDSON
City Clerk

ROBERT DAWES
City Treasurer

CHARLES M. DUGGAN JR.
City Manager

DANIEL J. McHUGH
City Attorney

5:00 p.m. Open Public Meeting, Public Comment (Closed Session)
6:00 p.m. Open Session (Public Meeting)
* * *
City Council Chambers
Civic Center, 35 Cajon Street, Redlands, California

REVISION NO. 1

A G E N D A

The following information comprises the agenda for the regular meetings of the City Council of the City of Redlands and the Board of Directors of the Successor Agency of the former Redevelopment Agency of the City of Redlands at the times noted below in the City Council Chambers, Civic Center, 35 Cajon Street, Redlands, California. **Although the meeting is open to the public, seating has been reduced to allow for social distancing.**

TUESDAY, FEBRUARY 1, 2022

To join via Zoom on a computer, laptop, or smart device
Please visit www.zoom.us, click on *Join a Meeting*
Enter the **Meeting ID 824 4618 0187**, then run the Zoom launcher

To join via Zoom with audio only (cell phone or landline):
Dial **1-877-853-5247**
Enter the **Meeting ID 824 4618 0187**

Should the City lose connectivity on Zoom, we will halt the meeting until it can be restored. To check on the status of remote connectivity in the event of an outage, go to the City's website at www.cityofredlands.org or to the City's Facebook page at @CityofRedlands or the Instagram page at @CityofRedlands_CityHall.

In the event the City cannot reestablish Zoom connectivity in a reasonable amount of time, the mayor will adjourn the meeting to a future date.

Anyone desiring to speak on an agendized item at this meeting may do so during the consideration of that item. Due to time constraints and the number of persons who may wish to give oral testimony, public comments will be limited to three (3) minutes.

- **To provide comment while participating from Council Chambers:**
  - Although it is not required, speakers are encouraged to submit a "Speaker Sign Up Sheet" before the meeting is convened. Forms are available in the Office of the City Clerk or in Council Chambers.
  - After the meeting has convened, you may place the speaker form in the basket at the table along the north wall of the Chambers. Please do not disturb the City Clerk while the meeting is in progress.
- **To provide comment through Zoom (on a computer, laptop, or smart device)**:
  - Click the "Raise Hand" button and the moderator will unmute you when it is your turn to speak
- **To provide comment via audio only (cell phone or landline)**:
  - Dial *9 to "Raise Hand". The moderator will identify you by your area code and last 3 numbers of your telephone number when it is your turn to speak.

PLEASE SILENCE CELL PHONES, PAGERS AND OTHER ELECTRONIC COMMUNICATION DEVICES UPON ENTERING THE CHAMBERS

5:00 P.M.

A. **Call City Council Meeting to Order**

B. **Public Comment**
(Any person wishing to provide public comment on a closed session matter may do so at this time.)

C. **Recess City Council Meeting to a Closed Session**

1. Conference with legal counsel: Existing Litigation - Government Code §54956.9(d)(1)
(City Attorney McHugh)
Two Cases:

   a. Steve Unland v City of Redlands, et al; San Bernardino Superior Court Case No. CIVDS 1928349
   b. S.B.C.W. Consulting, Inc. v City of Redlands et al; San Bernardino Superior Court Case No. CIVDS 2015309

6:00 P.M.

D. **Reconvene City Council Meeting**

E. ***Invocation by Council Member Gallagher - Pledge of Allegiance***
(In keeping with long-standing traditions of legislative invocations, this City Council meeting may include a brief invocation. Such invocations are not intended to proselytize or advance any one, or to disparage any other, faith or belief. Neither the City nor the City Council endorses any particular religious belief or form of invocation.)

F. **Closed Session Report**
(No reportable action taken in closed session unless otherwise announced by the City Attorney at this time.)

G. **Presentations**

1. Presentation of Proclamation declaring February 2022, as Black History Month in the City of Redlands to Jina Imani of the Artlands (Council Member Davis)

H. **Public Comments - City Council**
(At this time, the City Council will provide an opportunity for the public to address them on any subject, within the jurisdiction of the City Council, which is not already scheduled on this agenda. However, any matter that requires action will be referred to staff for a report and possible action at a subsequent meeting. Comments will be limited to three {3} minutes.)

I. **Consent Calendar**
(The following routine items have been recommended for approval and will be acted upon simultaneously unless separate discussion and/or action is requested by a Councilmember or a member of the audience.)

1. Approve minutes of the regular meeting of January 18, 2022 (City Clerk Donaldson)

2. Authorize issuance of a Proclamation declaring the month of February to be Black History Month in the City of Redlands (Council Member Davis)

3. Approve Resolution No. 8301 authorizing remote teleconference meetings by the City Council and all Boards, Commissions, and Committees of the City in accordance with Assembly Bill 361 (2021) for a period of 30 days (Council Member Davis)

4. Approve Resolution No. 8293 declaring intent to annex territory into Community Facilities District 2004-1 (Annexation No. 26), and determine the proposed project is exempt from environmental review pursuant to Section 15061(b)(3) of the state's guidelines implementing the California Environmental Quality Act (CEQA) (Municipal Utilities and Engineering Director Harris)

5. Disclosure of Agreement of Settlement and General Release - Sally Young; San Bernardino County Superior Court Case No. CIVDS1910352 (City Attorney McHugh)

J. **Communications**

1. Discussion and possible action regarding the renaming of Shoppers Lane, and consideration of Resolution No. 8302 (Mayor Barich)

2. Discussion and possible action relating to City Council compensation and consideration of Ordinance No. 2886 adjusting compensation for City Council Members (Mayor Pro Tem Tejeda)

K. **Public Hearings**

1. **PUBLIC HEARING** to consider Resolution No. 8292 (General Plan Amendment No. 144) and adoption of the 2021-2029 Housing Element (6th Cycle Housing Element Update) to the 2035 General Plan, and an Addendum to the previously-certified 2035 General Plan Environmental Impact Report
(Mayor to declare meeting open as a public hearing)
(Development Services Director Desatnik)

L. **New Business**

1. Consideration of a letter of support for the University of Redlands' State budget request for University Village - A Model Transit-Integrated Neighborhood in Redlands, CA (City Manager Duggan)

2. Consideration of a five-year lease agreement with Lenslock Inc. for body worn cameras in the amount of $478,065 (Police Chief Catren)

3. Consideration of Ordinance No. 2930 (Ordinance Text Amendment No. 360), to amend Title 18 of the Redlands Municipal Code by modifying Chapter 18.92.080(B) pertaining to developments standards in the C-3, General Commercial District to allow residential density in accordance with the existing provisions of Measure “U,” and modify the parking requirements for mixed use development and multifamily-attached residential development projects located within one-half mile of a train station (Development Services Director Desatnik)

4. Consideration of an agreement with LiftOff LLC for the provision of software licensing and consulting services in the amount of $160,000 for the initial term, with an option for four additional extension terms, each in the amount of $130,000 bringing the total compensation during the initial term and four extension terms to an amount not-to-exceed $680,000 (Management Services/Finance Director Garcia)

5. Consideration of a construction contract with Borden Excavating, Inc. for the 2021 CIP Water Pipeline Replacement Project in an amount not to exceed $3,555,000, and determine that the project is categorically exempt from environmental review pursuant to Section 15302 of the State's guidelines implementing the California Environmental Quality Act (Municipal Utilities and Engineering Director Harris)

6. Consideration of an Amendment to the City's Cooperative Agreement with San Bernardino County Transportation Authority for the Interstate 10 at University Street Interchange project; approval of an additional appropriation in the amount of $137,830; and determine approval of this Amendment is exempt from environmental review pursuant to Section 15061(b)(3) of the State's Guidelines implementing the California Environmental Quality Act (Municipal Utilities and Engineering Director Harris)

M. **Individual Council Member Announcements and/or Reports on Activities**
(No collective discussion or action.)

N. **Adjournment**
The next regular meeting of the City Council will be held on February 15, 2022.

O. **Successor Agency of the former Redevelopment Agency of the City of Redlands**

1. Call regular meeting of the Successor Agency Board of Directors to order

2. Public Comments
(At this time, the Agency Board will provide an opportunity for the public to address them on any subject, within the jurisdiction of the Successor Agency of the former Redevelopment Agency of the City of Redlands, which is not already scheduled on this agenda. However, any matter that requires action will be referred to staff for a report and possible action at a subsequent meeting. Comments will be limited to three {3} minutes.)

3. Approve minutes of the regular meeting of December 7, 2021 (Secretary Donaldson)

4. Adjourn Successor Agency Board of Directors' meeting.
The next regular meeting of the Agency will be held on March 1, 2022

If you challenge any proposed development entitlement listed on this agenda in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Council at or prior to this public hearing.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact Goutam Dobey, of the Municipal Utilities and Engineering Department at (909) 798-7584 ext 2. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

(28 CFR 35.102-35.104 ADA Title II)

Any writings or documents distributed to a majority of the City Council regarding an open session agenda item less than 72 hours before this meeting are available for public inspection at the City Clerk's Office or at the dais of the City Clerk once the open session begins.

Staff reports or other written documentation relating to items referred to on the agenda are available at the A. K. Smiley Public Library, 125 West Vine Street, Redlands, California, and on the City's website referenced below.

Regular meetings are televised live on Redlands TV Channel 3 (Spectrum) and Channel 35 (Frontier) and re-broadcasted at 7:00 P.M. the following Wednesday, Friday and Sunday; and at 9:00 A.M. Thursday, Saturday and Monday. Agendas, staff reports and minutes of the City Council of the City of Redlands are available on the Internet:

http://www.cityofredlands.org

"A City That Works"

City Council/Successor Agency Meeting **I. 1.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Approve minutes of the regular meeting of January 18, 2022 (City Clerk Donaldson)

MOTION:

I move to approve the minutes of the regular meeting of January 18, 2022.

Attachments

Regular Meeting Minutes of January 18, 2022

MINUTES

Regular meetings of the City Council and the Redlands Financing Authority of the City of Redlands held on January 18, 2022, at 5:00 P.M.

Present: Paul Barich, Mayor
Eddie Tejeda, Mayor Pro Tempore
Denise Davis, Council Member
Jenna Guzman-Lowery, Council Member
Mick Gallagher, Council Member

Staff: Charles M. Duggan, Jr., City Manager; Dan McHugh, City Attorney; Robert Dawes, City Treasurer; Jeanne Donaldson, City Clerk; Janice McConnell, Assistant City Manager; Chris Boatman, Assistant City Manager; Carl Baker, Public Information Officer; Chris Catren, Police Chief; Danielle Garcia, Management Services/Finance Director; Brian Desatnik, Development Services Director; John Harris, Municipal Utilities and Engineering Director; Rich Sessler, Interim Fire Chief

This was conducted as a teleconference meeting held in the City Council Chambers, Civic Center, 35 Cajon Street, Redlands, California 92373 and held in the Grand View Room, Redlands Community Senior Center, 111 West Lugonia, Redlands, CA 92374.

Mayor Barich, Mayor Pro Tempore Tejeda and Council Member Davis were present in the Council Chamber, while Council Member Guzman-Lowery attended via teleconferencing at the Redlands Community Senior Center. Most City staff participated remotely. All votes during the meetings were conducted by roll call.

Mayor Barich called the meeting to order at 5:00 P.M. and a quorum was established.

PUBLIC COMMENT

None forthcoming

CLOSED SESSION

Conference with real property negotiators - Government Code §54956.8
(Municipal and Utilities and Engineering Director Harris)

Property:	APNs 0300-451-13-0000, 0300-451-14-0000, 0300-451-24-0000, 0300-451-25-0000; (Property located on Helen Court)
Agency Negotiators:	Charles M. Duggan and John R. Harris
Negotiating Party:	Cathy A. Macknet, Kenneth D. Macknet II, Mark R. Macknet
Under negotiation:	Terms of payment and price of possible property purchase by City

Conference with real property negotiators - Government Code §54956.8
(Municipal and Utilities and Engineering Director Harris)

Property:	APNs 0318-061-07-0000, 0318-111-02-0000, 0303-071-14-0000, 0299-321-04-0000
Agency Negotiators:	Charles M. Duggan and John R. Harris
Negotiating Party:	South Mountain Water Company
Under negotiation:	Terms of payment and price of possible property purchase by City

RECONVENE CITY COUNCIL MEETING

The meeting reconvened at 6:00 P.M.

2022 By-District Council Member Election Boundaries

Mayor Barich opened the public hearing and called on Development Services Director Desatnik who introduced Todd Tatum, of National Demographics Corporation (NDC). Mr. Tatum provided a brief overview of the redistricting process to examine the current district boundaries and how that lines up with the 2020 Census data. He highlighted the following City specific information: Current Total Population is 73,385; Each District population should be roughly 14,680; Current Deviation is 3.60%; The current District Map is considered 'Balanced' based on the criteria of the California Voting Rights Act and the City would not need to make changes to the districts. The districts must be substantially equal in population and the draft map, which is based on existing district boundaries has been reviewed for compliance with Federal and State law including the Voting Rights Act and the Fair And Inclusive Redistricting for Municipalities And Political Subdivisions (FAIR MAPS) Act. He reviewed the federal laws, state criteria and listed other traditional redistricting principles, including: Minimizing voters shifted to different election years; Respecting voters' choices / continuity in office; Future population growth; Preserving the core of existing districts.

Mayor Pro Tem Tejeda requested the Council consider developing a new map which might reflect more balance among all the districts and offer a deviation of less than 3.60%, as seen in the consultant's map. He mentioned that in 2017 when the City was first determining district boundaries, a map was drawn by students and professors from the University of Redlands, and he recommended this map could be utilized as a guide for establishing tighter balances among the districts. Mr. Tatum agreed this was certainly doable and NDC could immediately begin to draw a new map. With no further comments, the Mayor closed the Public Hearing.

Materials for members of the public to utilize for drawing draft district maps and submitting proposed maps to the City are available on the City's redistricting website, which can be found at drawredlands.org where the current election district boundary map, demographics and paper mapping tools can be found. The public is invited to submit information regarding their Communities of Interest and proposed district boundaries for the 2021 redistricting process by January 31, 2022, and all draft maps will be published to the website on February 7, 2022. The future hearing date to consider draft maps will be held on February 15, 2022,

and for final map adoption by April 17, 2022.

Invocation

Council Member Guzman-Lowery presented an invocation which was followed by the pledge of allegiance to the American flag.

Council Member Appointment District 5

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Denise Davis, the City Council unanimously approved, by roll call vote, the appointment of Mick Gallagher to serve on the City Council representing Council District 5 until a newly elected Council Member takes office in December 2022.

Vote: 4 - 0 Passed

Oath of Office - City Clerk Donaldson administered the oath of office to newly appointed Council Member Gallagher

Mayor Barich recessed the meeting briefly and reconvened at 6:27 P.M.

Appointee Comments - Council Member Gallagher recognized the tremendous service of former Council Member Paul W. Foster and thanked the Council Members for placing their confidence in him with this appointment. He expressed his appreciation of the City, his wife, Sandie, and was honored to serve again on the Council.

CLOSED SESSION REPORT

City Attorney McHugh announced that no reportable action was taken during the closed session.

PUBLIC COMMENT

None forthcoming

CONSENT CALENDAR

Minutes

On motion of Mayor Paul Barich, seconded by Council Member Denise Davis, the City Council approved, by roll call vote, the minutes of the regular meeting of December 21, 2021.

Vote: 4 - 1 Passed
ABSTAIN: Council Member Gallagher

Emergency Resolution No. 8065 Report

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously approved, by roll call vote, the Report regarding Emergency Resolution No. 8065 proclaiming the existence of a local emergency in response to COVID-19 (Coronavirus Disease 2019).

Vote: 5 - 0 Passed

2020-21 Year-End Encumbrance and Carryover Balances

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously approved, by roll call vote, additional appropriations of 2020-21 Year-End Encumbrance and Carryover Balances.

Vote: 5 - 0 Passed

Cellular Tower Lease Revision

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously determined, by roll call vote, that approval of the revised request to co-locate facilities on an existing cellular tower lease site at the Dearborn Reservoir site is exempt from environmental review under Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved the revised Crown Castle Consent Request to co-locate facilities on an existing cellular tower lease site at the Dearborn Reservoir site.

Vote: 5 - 0 Passed

Resolution No. 8290 Yucaipa Sub-Basin Groundwater Sustainability Plan

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously approved, by roll call vote, Resolution No. 8290, to adopt the Yucaipa Sub-Basin Groundwater Sustainability Plan (Basin No. 8-002.07).

Vote: 5 - 0 Passed

Aerial Mapping & Land Surveying Services Agreement

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously determined, by roll call vote, that the agreement with Aero Tech Surveys is exempt from environmental review pursuant to Section 15301 of the State's guidelines implementing the California Environmental Act; and approved an agreement with Aero Tech Surveys to provide aerial mapping and land surveying services for the California Street Landfill in an amount not-to-exceed $39,000 for the initial term of one year, with the option to extend by two additional one-year terms for a total amount not-to-exceed $117,000.

Vote: 5 - 0 Passed

Traffic Signal Cabinet Battery Backup Systems Purchase

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously determined, by roll call vote, that approval of the purchase order is exempt from environmental review pursuant to Section 15301 of the State's guidelines implementing the California Environmental Act; and approved a sole source purchase order with NexTech Systems, Inc. for the provision of traffic signal cabinet battery backup systems in an amount not to exceed $48,500.81.

Vote: 5 - 0 Passed

Request to Consume Alcohol at Smiley Park Watchorn Lincoln Dinner

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously determined, by roll call vote, that approval of the request for the consumption of alcoholic beverages within a City park during the Watchorn Lincoln Dinner is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved the request for the consumption of alcoholic beverages at Smiley Park during the Lincoln Dinner to be held on February 12, 2022.

Vote: 5 - 0 Passed

California Market Match Program Grant Acceptance

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously approved, by roll call vote, the acceptance of the California Market Match Program Grant through the Ecology Center in the amount of $4,260; and approved an additional appropriation of the same.

Vote: 5 - 0 Passed

Citizens' Measure T Oversight Committee Appointment

On motion of Council Member Mick Gallagher, seconded by Council Member Denise Davis, the City Council unanimously appointed, by roll call vote, Edward Ico to serve the remainder of an unexpired term representing Council District 2 on the Citizens' Measure T Oversight Committee ending April 20, 2025, as recommended by Mayor Pro Tem Tejeda.

Vote: 5 - 0 Passed

COMMUNICATIONS

Video Series Making Redlands a Better Place

Public Information Officer Baker presented a new video from the video series "Working for You: Making Redlands a Better Place." This month's video highlighted Aaron Canedo, Water Distribution Supervisor. Filming and production work was provided by Cheryl Williams, Multimedia Production Coordinator.

Hometown Heroes Recognition

Assistant City Manager Boatman commemorated military service members whose banners have been retired from the Redlands Hometown Heroes Military Banner Program. The program recognizes and honors Redlands residents and their immediate family members who are actively serving in, or have been honorably discharged from the United States Armed Forces. Council Member Gallagher offered his heartfelt thanks to this group of Hometown Heroes. With appreciation for their sacrifice associated with military service to our country, the following banners have been retired:

1. Andrew Felarca, Navy - Banner flown over the streets of Redlands from May 2013 to March 2021
2. Anthony Garcia, Army - Banner flown over the streets of Redlands from May 2012 to March 2021
3. Skylar Nieman, Army - Banner flown over the streets of Redlands from May 2012 to March 2021
4. Jacob Rechsteiner, Army - Banner flown over the streets of Redlands from November 2012 to March 2021
5. Alexander Tovar, Marines - Banner flown over the streets of Redlands from November 2012 to March 2021

Council Ad Hoc COVID-19 Subcommittee

Mayor Pro Tem Tejeda explained that in 2020, the City Council formed an Ad Hoc Committee comprised of then Mayor Foster and Mayor Pro Tem Davis, who provided guidance to staff on matters relating to the COVID-19 pandemic. With the recent retirement of Paul Foster, a vacancy exists on the Subcommittee, and Mayor Pro Tem Tejeda expressed an interest in filling the empty seat. Council Member Davis thanked Mayor Pro Tem Tejeda for his willingness to serve on the Subcommittee.

On motion of Mayor Paul Barich, seconded by Council Member Denise Davis, the City Council unanimously appointed, by roll call vote, Mayor Pro Tem Tejeda to the Council Ad Hoc COVID-19 Subcommittee, to fill the vacancy left by the retirement of Council Member Foster.

Vote: 5 - 0 Passed

Renaming Shoppers Lane

Council Member Davis recapped events leading to the consideration of the renaming of Shoppers Lane to Al Harris Avenue. Mr. Harris, a long-time employee of Krikorian Theater, was beloved by many in the community. Council Members Davis and Guzman-Lowery fully supported the renaming, not only as a way to honor the man, but also to honor the over 10,000 electronic signatures collected. Council Member Gallagher and Mayor Barich stressed the City should use the highest standards when naming streets and public places. They agreed Mr. Harris was a great guy, but they raised questions whether he was the most deserving of this honor. Mayor Barich put forth the name of Joseph A. Rivera, a Latino and the City's first constable.

As public comment, Robb McDermott stated that he created the petition and collected the signatures. He and Andy Hoder listed various reasons for their support to rename the street to Al Harris Avenue. Phil Courtney added he had spoken with the LOOK theater owner, and they were planning to build a memorial wall for Al Harris. Mario Saucedo, of Common Vision Coalition, and Toni Momberger provided some historical background of Joseph A. Rivera and urged the Council to consider honoring him by renaming the street in his memory. Council Members continued to discuss the matter at length with no clear consensus.

On motion of Council Member Denise Davis, seconded by Council Member Jenna Guzman-Lowery, the City Council failed, by roll call vote, to rename Shoppers Lane to Al Harris Avenue.

Vote: 2 - 3 Failed

NAY: Mayor Paul Barich
Mayor Pro Tempore Eddie Tejeda
Council Member Mick Gallagher

Another motion, made by Mayor Pro Tem Tejeda, to rename Shoppers Lane in honor of Joseph A. Rivera, failed due to lack of a second.

Resolution No. 8291 Virtual City Council Meetings

Assistant City Manager McConnell provided background related to holding virtual City Council meetings in compliance with Assembly Bill 361. She listed the specific requirements for public agencies to hold virtual meetings during a proclaimed state of emergency to remain in compliance with the Brown Act, including the requirement to provide a way for real-time public comments to be made. She presented Resolution No. 8291, authorizing remote teleconference meetings by the City Council and all boards, commissions and committees of the City in accordance with AB 361. Council Member Davis encouraged her colleagues to support the resolution to allow the Council flexibility and give the option to attend meetings remotely, while also protecting the public health.

On motion of Council Member Denise Davis, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved, by roll call vote, Resolution No. 8291.

Vote: 5 - 0 Passed

PUBLIC HEARINGS

Parking Requirements Downtown Specific Plan

Mayor Barich opened the public hearing and called on Development Services Director Desatnik for details on the proposal to amend the Redlands Municipal Code pertaining to developments standards in the C-3, General Commercial District to allow residential density in accordance with the existing provisions of Measure "U," and modify the parking requirements for mixed use development and multifamily-attached residential development projects located within one-half mile of a train station. The 2035 General Plan encourages new infill development in the interior core areas of the City and around the three new train stations in particular. This infill development is to emphasize transit-oriented development, of which compact mixed uses (residential combined with commercial uses) play a key role. The proposed amendments will reduce ambiguity concerning density allowed in the C-3, General Commercial zone for the downtown area and modify on-site parking standards for mixed-use projects and residential projects located within one-half mile of a train station. This will better match the actual parking demands of transit-oriented developments. The Planning Commission reviewed the proposed code amendment and voted 4 to 1 recommending approval to the City Council.

Council Member Gallagher and Mayor Barich were not convinced the parking demands of downtown development would be reduced, and they expressed concerns that the public will continue to drive their vehicles and will still need to park. Mayor Pro Tem Tejeda wanted to make it clear to everyone that the Council was aware the public considered parking to be a big concern, and he said addressing those concerns was a priority of the City. Council Members Davis and Guzman-Lowery supported the amendments and the transit village concept, built on smart growth through the use of smarter planning and development principles.

As public comment, Andy Hoder did not support the proposals, questioned the math used to determine the projected parking needs and reminded everyone that former Council Member Foster publicly opposed these changes, stating the developers were the ones to benefit. Ruth Cook stressed the nature of finding the right balance between having just enough parking and having too much parking. Brian Seghers stated that parking spaces downtown were already limited, and he was concerned the amendments would favor large developers and place an undue burden on small business owners. No written comments were received and Mayor Barich closed the public hearing.

Director Desatnik pointed out that walkability attracts the public to a downtown area, and he recommended the City better utilize the existing parking spaces and work towards informing and educating the public. City Manager Duggan added the proposals were not intended as a developer incentive but were meant to standardize the actual need with the demand. He said he was planning to direct staff to reexamine the downtown parking situation and provide a report to Council in the next fiscal year.

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Denise Davis, the City Council introduced, by roll call vote, Ordinance No. 2930 (Ordinance Text Amendment No. 360), to amend Title 18 of the Redlands Municipal Code by modifying Chapter 18.92.080(B) pertaining to developments standards in the C-3, General Commercial District to allow residential density in accordance with the existing provisions of Measure "U," and modify the parking requirements for mixed use development and multifamily-attached residential development projects located within one-half mile of a train station; and approved Resolution No. 8274 Specific Plan Amendment No. 22 to the Downtown Specific Plan (Specific Plan No. 45), to amend Section III, Part C (Property Development Standards), sub-sections 1.7 and 3.7 of Specific Plan No. 45, to modify the on-site parking requirements for mixed use development and multifamily attached residential development projects located within one-half mile of a train station.

Vote: 3 - 2 Passed

NAY: Mayor Paul Barich
Council Member Mick Gallagher

NEW BUSINESS

Resolution No. 8263 Independent Contractor Agreements

Assistant City Manager Boatman reviewed Resolution No. 8263 authorizing the City Manager to approve standard form Independent Contractor Agreements for recreational services and programs, administered by the Facilities and Community Services Department Recreational Division. He explained the change to the procedures will enhance the number of programs offered through the Recreation Division and will provide for a more efficient and timely permitting process. The current process requires that each similar agreement be considered and approved by the City Council. The proposed resolution would streamline this process and allow the City Manager or designated City staff to administratively approve the Recreation Division standard form of independent contractor agreements.

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Mick Gallagher, the City Council unanimously approved, by roll call vote, Resolution No. 8263, authorizing the City Manager to approve standard form Independent Contractor Agreements for recreational services and programs, administered by the Facilities and Community Services Department Recreational Division; and determined that approval of the resolution is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act.

Vote: 5 - 0 Passed

CFD Landscape Services Amendment

Assistant City Manager Boatman presented the need for the First Amendment to the non-professional services agreement with RP Landscape and Irrigation to increase the second renewal annual compensation from $66,036 to $122,663.92 and the total compensation under the Agreement to an amount not-to-exceed $254,735.92. Staff performed a cost projection for the existing contract and determined that an additional $56,627.92 will be needed for the remainder of the agreement to address additional landscaping.

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Denise Davis, the City Council unanimously determined, by roll call vote, that approval of the first amendment to the non-professional services agreement with RP Landscape and Irrigation is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved the first amendment to the non-professional services agreement with RP Landscape and Irrigation to increase the second renewal annual total compensation from $66,036 to $122,663.92; and the total compensation under the agreement to an amount not-to-exceed $254,735.92.

Vote: 5 - 0 Passed

WWTP Recycled Water Reservoir Engineering Project

Municipal Utilities and Engineering Department Director Harris introduced a Professional Services Agreement with Carollo Engineers for the WWTP Recycled Water Reservoir Engineering Project. The intent of the project is to engineer two 1.5 MG recycled water reservoirs at the WWTP to store this water for a more beneficial use. One reservoir is scheduled for construction in FY 22/23, and the second reservoir is scheduled for construction in FY 23/24.

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Mick Gallagher, the City Council unanimously determined, by roll call vote, that approval of a Professional Services Agreement with Carollo Engineers is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; approved an additional expenditure appropriation of $734,839 from the Non-Potable Capital Improvement Fund (532), which is a Development Impact Fee Fund; and approved the Professional Services Agreement with Carollo Engineers for the WWTP Recycled Water Reservoir Engineering Project in an amount not-to-exceed $734,839.

Vote: 5 - 0 Passed

COUNCIL MEMBER ANNOUNCEMENTS AND ACTIVITIES

Council Member Davis thanked City Attorney McHugh for his participation with the Youth Council held via zoom on January 12, 2022.

ADJOURNMENT

There being no further action required the meeting adjourned at 8:06 P.M. The next regular meeting of the City of Redlands City Council will be held on February 1, 2022

REDLANDS FINANCING AUTHORITY

Chairman Barich called the meeting to order and offered anyone present the opportunity to address the Board on any subject, not already on the agenda, within the jurisdiction of the Redlands Financing Authority.

PUBLIC COMMENTS

None forthcoming

Minutes

On motion of Vice Chair Tejeda, seconded by Board Member Davis, the minutes of the regular meeting of September 21, 2021, were approved, by roll call vote.

Vote: 4 - 1 Passed
ABSTAIN: Board Member Gallagher

ADJOURNMENT

There being no further business, the Redlands Financing Authority adjourned at 8:07 P.M. The next regular meeting of the Agency will be held on May 17, 2022.

"A City That Works"

City Council/Successor Agency Meeting **I. 2.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Authorize issuance of a Proclamation declaring the month of February to be Black History Month in the City of Redlands (Council Member Davis)

MOTION:

I move to authorize the issuance of a Proclamation declaring the month of February to be Black History Month in the City of Redlands.

Attachments

Proclamation Black History Month

Proclamation

Black History Month

WHEREAS, Black History Month, celebrated annually during the month of February, was created by Carter G. Woodson in 1926 to highlight the contributions and accomplishments made by the Black community to our Nation, which until then had been omitted; and

WHEREAS, ISREAL BEAL, born into slavery April 10, 1848, was freed from slavery by the Emancipation Proclamation issued by President Abraham Lincoln in 1863 and served as a teamster who traveled with the U.S. Army. He was a Redlands pioneer, property owner, builder, and business owner, also contributing to the construction of early churches in Redlands, the City's reservoir, the original Big Bear Dam, and planting the 160-acre vineyard which now makes up part of the University of Redlands campus; and

WHEREAS, we acknowledge the strides made since the passage of the Fifteenth Amendment which allowed African-American men the right to vote but was met with decades of barriers, including violence and discrimination. Finally, with the 19th amendment of 1919 and the Voting Rights Act of 1965, the true promise of suffrage for all people was closer to attainment. We recognize the need for continued removal of barriers to those rights for voter access and political participation; and

WHEREAS, the City of Redlands takes this month to recognize the oldest and first African-American Church in the San Bernardino Valley, the Second Baptist Church, founded in 1891 and incorporated in 1899, which has provided in its subsequent 130 years much needed spiritual leadership and resources within the Redlands community regardless of race, ethnicity or class; and

WHEREAS, we too take this time to recognize the historic accomplishments of the founders and writers for the Colored Citizen, a local monthly periodical founded in July 1905 and published through December 1906, which highlighted the African-American community and preserved history at a time when there were no Black public officials, nor other local publications touting the accomplishments of people of color; and

WHEREAS, Dr. Paulette Brown-Hinds and her team partnered with Esri to create the Mapping Black California initiative, which utilizes Esri's ArcGIS platform to not only tell the story of Black California, but to also better understand the data and history of Black communities throughout the state. The community-mapping project also addresses the growing national concern over the lack of diversity in the technology industry; and

WHEREAS, we recognize and celebrate the creation of a local group in 2020, NEXTGENUNITED--The Black Initiative. They have organized protests, vigils, online critical conversations about race, and have influenced local governing bodies to adopt resolutions declaring racism as a public health crisis; and

WHEREAS, in our recognition of Black History Month and these great local accomplishments, we reflect on the large strides that we have made to ensure freedom for all people regardless of race, color, or creed in the pursuit of life, liberty, and happiness; and

WHEREAS, the City of Redlands honors Al "the movie man" Harris. He served movie goers in the city of Redlands for 20 years. His positive impact was demonstrated in countless ways as he had a strong dedication and love for his community. He left a legacy of kindness and the Redlands community is better for it; and

WHEREAS, we recognize and will continue to call our attention towards the need to combat racism and build a society that lives up to its highest ideals and which works together against injustice, prejudice, intolerance, and racism wherever it may be;

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Redlands hereby declares the month of February, 2022 as Black History Month, and hereby encourages its residents to fight racism, intolerance and prejudice through education, kindness, compassion, and understanding.

IN WITNESS WHEREOF, we hereunto affix our signatures and Official Seal of the City of Redlands on this 1st day of February 2022.

_____

Paul T. Barich, Mayor

Attest:

_____

Jeanne Donaldson, City Clerk

"A City That Works"

City Council/Successor Agency Meeting **I. 3.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Approve Resolution No. 8301 authorizing remote teleconference meetings by the City Council and all Boards, Commissions, and Committees of the City in accordance with Assembly Bill 361 (2021) for a period of 30 days (Council Member Davis)

MOTION:

I move to approve Resolution No. 8301.

DISCUSSION:

On January 18, the City Council adopted Resolution No. 8291 authorizing remote teleconference meetings by the City Council and all Boards, Commissions, and Committees of the City in accordance with Assembly Bill 361 (2021) for a period of 30 days ending February 17, 2022. AB 361, signed into law on September 16, 2021, amends Government Code Section 54953 to provide the authority and specific requirements for public agencies to hold virtual meetings during a proclaimed state of emergency and remain in compliance with the Brown Act.

In accordance with Government Code Section 54953 (e)(3), the City Council must review the need and make findings for continuing the teleconferencing as authorized by AB 361 at least once every thirty days until the Governor terminates the state of emergency. With the adoption of Resolution No. 8301, the City Council is reaffirming its findings and compliance to AB 361 for an additional 30 days ending March 2, 2022.

SUBMITTED BY:
Council Member Denise Davis

Attachments

Resolution No. 8301 Teleconference Meeting

RESOLUTION NO. 8301

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS AUTHORIZING REMOTE TELECONFERENCE MEETINGS BY THE CITY COUNCIL AND ALL BOARDS, COMMISSIONS, AND COMMITTEES OF THE CITY IN ACCORDANCE WITH ASSEMBLY BILL 361 (2021) FOR A PERIOD OF THIRTY DAYS

WHEREAS, COVID-19 (also known as the "Coronavirus Disease") is a respiratory disease that has spread across the globe, with thousands of confirmed cases in California, including within the City of Redlands ("City"); and

WHEREAS, on January 31, 2020, the United States Secretary of Health and Human Services declared a public health emergency based on the threat caused by COVID-19, and the President of the United States issued a proclamation declaring a national emergency concerning COVID-19 beginning March 1, 2020; and

WHEREAS, in response to COVID-19, the Governor of the State of California issued a proclamation of a state of emergency on March 4, 2020; and

WHEREAS, the City Council of the City adopted a proclamation of a local emergency related to the COVID-19 virus on March 17, 2020; and

WHEREAS, the City is committed to preserving and fostering public access, transparency, observation, and participation in meetings of the City Council and City boards, commissions, and committees (hereafter collectively referred to as "legislative bodies;") and

WHEREAS, all meetings of the City Council and legislative bodies are open and public as required by the Ralph M. Brown Act ("Brown Act") (Government Code section 54950 *et seq*.), so that any member of the public may attend, observe, and participate in a meaningful way; and

WHEREAS, Government Code section 54953(b)(3) of the Brown Act allows a local legislative body to hold public meetings by teleconference and to make public meetings accessible telephonically or otherwise electronically to all members of the public seeking to attend and to address the local legislative body, as long as the following requirements are met:

1. Each teleconference location from which a member is participating is noticed on the agenda;
2. Each teleconference location is accessible to the public;
3. Members of the public must be able to address the body at each teleconference location;
4. At least one member of the legislative body must be physically present at the location specified in the meeting agenda; and

5. During teleconference meetings, at least a quorum of the members of the local body must participate from locations within the local body's territorial jurisdiction; and

WHEREAS, the Brown Act, as amended by AB 361 (2021), at Government Code section 54953(e), allows for remote observation and participation in meetings by members of a legislative body and members of the public without compliance with the requirements of Government Code section 54953(b)(3), subject to certain conditions; and

WHEREAS, the initial required condition of Government Code section 54953(b)(3) is a declaration of a state of emergency by the Governor pursuant to the California Emergency Services Act at Government Code section 8625, proclaiming the existence of conditions of disaster or of extreme peril to the safety of persons and property within the state and within the boundaries of the City, caused by conditions as described in Government Code section 8558; and

WHEREAS, the Governor's proclamation of a state of emergency includes area within the jurisdictional boundaries of the City; and

WHEREAS, Government Code section 54953(e)(3)(A-B), added by AB 361, provides an alternative to having public meetings in accordance with Government Code Section 54953(b)(3) when the City Council has reconsidered the circumstances of the COVID-19 state of emergency and that the following circumstances exist:

1. The state of emergency as a result of COVID-19 continues to directly impact the ability of the members of City Council and the members of the City's boards, commissions, and committees to meet safely in person; and

2. The State of California and the County of San Bernardino continue to recommend measures to promote social distancing; and

WHEREAS, Government Code Section 54953(e) further requires that state or local officials have imposed, or recommended, measures to promote social distancing, or the legislative body finds that meeting in person would present an imminent risk to the health or safety of attendees; and

WHEREAS, such conditions now exist in the City in that (i) state and local officials do recommend social distancing measures, and (ii) emergency conditions evidenced by COVID-19 and its variants create ongoing COVID-19 cases, hospitalizations, and deaths, such that meeting in person would present imminent risk to health or safety of attendees; and

WHEREAS, the City Council affirms that it will allow for observation and participation by City Council members as well as board, commission, and committee members and the public, via Zoom, or other appropriate technology, in an effort to protect the constitutional and statutory rights of all attendees; and

WHEREAS, Government Code Section 54953 (e)(3) further requires that the City Council review the need and make findings for continuing the teleconferencing as authorized by AB 361 at least once every thirty days until the Governor terminates the state of emergency;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDLANDS HEREBY RESOLVES AS FOLLOWS:

Section 1. The above recitals are true and correct and are incorporated herein by this reference.

Section 2. The City Council finds that the state of emergency conditions related to COVID-19 as set forth in the Governor's and City's proclamations of emergency are on-going.

Section 3. The City Council further finds that State and county officials recommend social distancing conditions causing imminent risk to attendees as described above exist.

Section 4. The City Council hereby recognizes and affirms the existence and conditions of a state of emergency as proclaimed by the Governor, and the City, and affirms, authorizes, and proclaims the existence of a local emergency throughout the City.

Section 5. The City Council finds that the state of emergency as a result of COVID-19 continues to directly impact the ability of members of the City Council and the members of the City's boards, commissions, and committees to meet safely in person and such fact creates an imminent health risk to such members.

Section 6. The City Council hereby authorizes the City Council, and all of the boards, commissions, and committees of the City, to conduct their meetings without compliance with Government Code section 54953(b)(3), and to instead comply with the remote meeting requirements as authorized by Government Code section 54953(e).

Section 7. The City Manager and City Clerk are authorized and directed to take all actions reasonably necessary to carry out the intent and purpose of this Resolution, including, conducting open and public meetings remotely in accordance with Government Code section 54953(e), and other applicable provisions of the Brown Act, for all City Council meetings, and all boards, commissions, and committee meetings of the City.

Section 8. This Resolution shall take effect immediately upon its adoption and shall be effective until either (i) March 2, 2022 or (ii) such time as the City Council adopts a Subsequent Resolution in accordance with Government Code section 54953(e)(3) to extend the time during which the City Council and all City legislative bodies may continue to meet remotely, without compliance with Government Code section 54953(b)(3), but otherwise as permitted by Government Code section 54953(e).

ADOPTED, SIGNED AND APPROVED this 1st day of February, 2022.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing Resolution was duly adopted by the City Council at a regular meeting thereof held on the 1st day of February, 2022, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Jeanne Donaldson, City Clerk

L:\ca\Reso\8301 teleconference meeting.docx

"A City That Works"

City Council/Successor Agency Meeting **I. 4.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Approve Resolution No. 8293 declaring intent to annex territory into Community Facilities District 2004-1 (Annexation No. 26), and determine the proposed project is exempt from environmental review pursuant to Section 15061(b)(3) of the state's guidelines implementing the California Environmental Quality Act (CEQA) (Municipal Utilities and Engineering Director Harris)

MOTION(S):

If the City Council determines that staff recommendations are appropriate, the following motions are provided:

1. I move that the City Council determine approval of Resolution No. 8293 is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and

2. I move to approve Resolution No. 8293.

RECOMMENDATION:

Staff recommends City Council adopt Resolution No. 8293, declaring intention to annex territory into Community Facilities District No. 2004-1, and determine the proposed project is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act.

DISCUSSION:

The City Council established Community Facilities District No. 2004-1 (CFD) for the purpose of providing certain services which are necessary to meet demands placed upon the City by development. The City Council adopted Resolution No. 8286, a Resolution of Intention to annex territory into the CFD on December 21, 2021. On the Annexation Map for Annexation No. 26, the properties to be annexed were identified as Assessor's Parcel Numbers 0167-091-02-0000, 0167-091-04-0000, 0167-091-05-0000, and 0167-091-08-0000, which were being subdivided by Tract Map No. 20257 into a single family residential subdivision comprised of 207 numbered lots and 7 lettered lots.

The San Bernardino County has assigned new Assessor Parcel Numbers (APNs) to all the parcels created with Tract Map No. 20257. Therefore, a new Resolution of Intention must be adopted to schedule a public hearing stating the City's intention to annex the newly numbered parcels into Community Facilities District No. 2004-1 in order that they may be developed and receive the benefit of services which will be financed by the annual levy of special taxes on said property sufficient to pay the costs of such services and costs incidental thereto.

City staff received a petition from Lennar Homes of California, Inc. requesting annexation of its property into the CFD for the maintenance of perimeter lettered lots, retention basins, and street trees within and adjacent to Tract Map No. 20257. When the petition was prepared the Assessor's Parcel Numbers for the property area were 0167-091-02-0000, 0167-091-04-0000, 0167-091-05-0000, and 0167-091-08-0000. This area is now identified as Assessor's Parcel Numbers 0167-462-01-0000 through 0167-462-33-0000, 0167-463-01-0000 through 0167-463-70-0000, 0167-473-01-0000 through 0167-473-72-0000, and 0167-474-01-0000 through 0167-474-39-0000 as shown on Attachment C. This annexation is for the property located at the northwest corner of Texas Street and San Bernardino Avenue. Tract Map No. 20257 was approved by the City Council on October 19, 2021.

If Resolution No. 8293 is approved, a public hearing will be scheduled for the City Council meeting on March 15, 2022. Approval of Resolution No. 8293 will also rescind Resolution No. 8286 which scheduled a public hearing for February 15, 2022, on this matter.

The proposed project is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act (CEQA) as it has been determined there is no possibility the annexation of the proposed project will result in any environmental effect.

ALTERNATIVES:

N/A

STRATEGIC PLAN:
N/A

SUBMITTED BY:
John R. Harris, Municipal Utilities and Engineering Director

RECOMMENDED BY:
Charles M. Duggan, Jr., City Manager

REVIEWED BY:
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager
Christopher Boatman, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Donald Young, One Stop Permit Center Manager

Fiscal Impact

Discussion:
There is no financial impact. All costs associated with the annexation are paid by the developer.

Attachments

Attachment A. Resolution No. 8293
Attachment B. Signed Petition for Annexation
Attachment C. Annexation Boundary Map
Attachment D - Resolution No. 8286

RESOLUTION NO. 8293

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS AMENDING AND RESTATING RESOLUTION DECLARING INTENTION TO ANNEX TERRITORY TO COMMUNITY FACILITIES DISTRICT NO. 2004-1 OF THE CITY OF REDLANDS AND ADOPTING A MAP OF THE AREA PROPOSED TO BE ANNEXED THERETO (ANNEXATION NO. 26) AND RESCISSION OF RESOLUTION NO. 8286

WHEREAS, on December 21, 2021, the City Council (the "City Council") of the City of Redlands (the "City"), pursuant to Article 3.5 (commencing with Section 53339 of Chapter 2.5 of Part 1 of Division 2 of Title 5 of the California Government Code, commonly known as the "Mello-Roos Community Facilities Act of 1982" (the "Act"), adopted a resolution entitled "Resolution of the City Council of the City of Redlands Declaring Intention to Annex Territory to Community Facilities District No. 2004-1 of the City of Redlands and Adopting a Map of the Area Proposed to be Annexed Thereto (Annexation No. 26)" (the "Resolution of Intention"), stating its intention to annex certain parcels of property to Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California (the "Community Facilities District") in order that they may be developed and receive the benefit of services which will be financed by the annual levy of special taxes on said property sufficient to pay the costs of such services and costs incidental thereto; and

WHEREAS, the Resolution of Intention described the territory to be annexed in Exhibit "A" thereof, which territory consisted of four Assessor's Parcel Numbers; and

WHEREAS, the Resolution of Intention also adopted a map of the territory proposed to be annexed to the Community Facilities District entitled "Annexation Map No. 26, Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California," which map referenced the four Assessor's Parcel Nos. (the "Annexation Map"); and

WHEREAS, the Assessor's Parcel Numbers were subdivided such that the Assessor's Parcel Nos. have changed and increased in number; and

WHEREAS, this resolution amends and restates in its entirety the Resolution of Intention adopted December 21, 2021;

NOW, THEREFORE, BE IT RESOLVED, DETERMINED AND ORDERED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. Recitals. The above recitals are true and correct and are hereby incorporated into this resolution.

Section 2. Name of District. The name of the existing Community Facilities District is "Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California."

Section 3. Amendment of Rate and Method. The reference to the "Los Angeles-Riverside-Orange County" Consumer Price Index in Section C of the Rate and Method is hereby replaced with the "Riverside-San Bernardino-Ontario Consumer Price Index." No other portion of the Rate and Method shall be amended.

Section 4. Intention. The City Council declares its intention to conduct proceedings pursuant to said Article 3.5 for the annexation to the Community Facilities District of the territory described in Exhibit "A" attached hereto. The City Council determines that the public convenience and necessity require that such territory be annexed to the Community Facilities District.

Section 5. Description of Territory Proposed To Be Annexed; Annexation Map. The territory which is included in the Community Facilities District is described on the map of the Community Facilities District recorded on May 18, 2004 in Book 76 of Maps of Assessment and Community Facilities Districts, page 94, and as Instrument No 2004-0347327 in the official records of the County of San Bernardino. The territory proposed to be annexed to the Community Facilities District is described in Exhibit "A" attached hereto and by this reference made a part hereof. Such territory is also shown and described on the map thereof entitled "Annexation Map No. 26, Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California," which is on file with the City Clerk (the "Annexation Map").

Section 6. Types of Services; Incidental Expenses; Plan for Providing Services. The services to be provided and financed by the Community Facilities District are the maintenance of perimeter lettered lots, retention basins, and street trees adjacent to Tract Map No. 20257, including but not limited to, landscape maintenance in the area of the Property and the Community Facilities District. The Community Facilities District shall also finance costs associated with the determination of the amount of and the levy and collection of special taxes which are levied to provide such services and costs otherwise incurred in order to carry out its authorized purposes. The services described above shall be provided, as needed, throughout the Community Facilities District and the territory proposed to be annexed thereto for the benefit of all owners of property and residents of the Community Facilities District and the territory proposed to be annexed thereto. All owners of taxable parcels of property within the Community Facilities District and the territory proposed to be annexed thereto shall pay special taxes at the same rate to finance the annual cost of providing such services. The services to be provided and financed by the Community Facilities District, as previously described, are necessary to meet increased demands placed upon the City as a result of development occurring within the Community Facilities District and the territory proposed to be annexed thereto.

Section 7. Special Taxes. Except where funds are otherwise available, special taxes sufficient to pay the costs of the services described in Section 6 above and the annual administrative expenses of the City and the Community Facilities District in determining, apportioning, levying and collecting such special taxes, shall be annually levied within the territory proposed to be annexed to the Community Facilities District. Pursuant to Section 53340 of the California Government Code, the special taxes shall be collected in the same manner as ordinary ad valorem property taxes are collected and shall be subject to the same penalties and the same procedure, sale, and lien priority in case of delinquency as is provided for ad valorem

taxes. The rates and method of apportionment of said special taxes shall be as set forth in Exhibit "B" attached hereto and by this reference made a part hereof. The property within the territory proposed to be annexed shall be assigned at the rate set forth for Special Tax Rate Category B as set forth in Exhibit "B" attached hereto and for Fiscal Year 2022-23, and each Fiscal Year thereafter, assessed at the rate set forth in Table 2 in Exhibit "B" attached hereto, subject to annual increases beginning in Fiscal Year 2023-24 by the greater of 2% or the percentage increase in the Consumer Price Index as determined pursuant to the method of apportioning such special taxes set forth in said Exhibit "B".

Section 8. Adoption of Annexation Map. Pursuant to Section 3110.5 of the Streets and Highways Code, the City Council adopts the Annexation Map as the map of the area proposed to be annexed to the Community Facilities District. Pursuant to Section 3111 of said Code, the City Clerk shall file the original of the Annexation Map in her office and shall file a copy of the Annexation Map with the County Recorder of the County of San Bernardino no later than 15 days prior to the date of the hearing specified in Section 9 hereof.

Section 9. Hearing. A public hearing on the proposed annexation of said territory to the Community Facilities District shall be held at 6:00 p.m., or as soon thereafter as the matter may be heard, on March 15, 2022 in the Council Chambers at the City of Redlands Civic Center, 35 Cajon Street, Redlands, California, or via teleconference as directed by the City due to COVID-19 social distancing guidelines.

Section 10. Notice. The City Clerk shall publish a notice of the time and place of said hearing as required by Section 53322 of the California Government Code, and shall also give notice of the hearing by first class mail to each registered voter and landowner within the territory proposed to be annexed to the Community Facilities District as prescribed by Section 53339.4 of said Code. Said notice shall be published at least seven (7) days and mailed at least fifteen (15) days before the date of the hearing and shall contain the information required by said Section 53339.4.

Section 11. Description of Voting Procedures. The voting procedures to be followed in conducting the election on the proposition with respect to the levy of special taxes within the territory proposed to be annexed to the Community Facilities District to shall be as follows:

(a) If at the time of the close of the public or protest hearing (hereinafter referred to as the "protest hearing") at least 12 persons are registered to vote within the territory proposed to be annexed to the Community Facilities District, the election shall be conducted by the City Clerk, and shall be held on a date selected by the City Council in conformance with the provisions of Section 53326 of the California Government Code ("Section 53326") and pursuant to the applicable provisions of law regulating elections of the City, insofar as they may be applicable, and pursuant to Section 53326 the ballots for the election shall be distributed to the qualified electors of the territory proposed to be annexed to the Community Facilities District by mail with return postage prepaid and the election shall be conducted as a mail ballot election.

(b) If at the time of the close of the protest hearing, and for at least the preceding 90 days, less than 12 persons have been registered to vote within the territory proposed to be annexed to the Community Facilities District, and pursuant to Section 53326, the vote is

therefore to be by the landowners of that territory, with each landowner of record at the close of the protest hearing having one vote for each acre or portion of an acre of land that he or she owns, the election shall be conducted by the City Clerk as follows:

(1) The election shall be held on the earliest date following the conclusion of the protest hearing upon which it can be held pursuant to Section 53326 which may be selected by the City Council, or such earlier date as the owners of land within the territory proposed to be annexed to the Community Facilities District and the City Clerk agree and concur is acceptable.

(2) Pursuant to Section 53326, the election may be held earlier than 90 days following the close of the protest hearing if the qualified electors of the territory proposed to be annexed to the Community Facilities District waive the time limits for conducting the election set forth in Section 53326 by unanimous written consent and the City Clerk concurs in such earlier election date as shall be consented to by the qualified electors.

(3) Pursuant to Section 53326, ballots for the election shall be distributed to the qualified electors by the City Clerk by mail with return postage prepaid or by personal service.

(4) Pursuant to applicable provisions of law regulating elections of the City which govern the conduct of mail ballot elections, and Division 4 (commencing with Section 4000) of the California Elections Code with respect to elections conducted by mail, the City Clerk shall mail or deliver to each qualified elector an official ballot in a form specified by the City Council in the resolution calling the election, and shall also mail or deliver to all such qualified electors a ballot pamphlet and instructions to voter, including a sample ballot identical in form to the official ballot but identified as a sample ballot, a statement pursuant to Section 9401 of the said Code, an impartial analysis by the City Attorney pursuant to Section 9280 of the said Code with respect to the ballot proposition contained in the official ballot, ballot arguments and rebuttals, if any, pursuant to Sections 9281 to 9287, inclusive, of said Code, a return identification envelope with prepaid postage thereon addressed to the City Clerk for the return of voted official ballots, and a copy of this resolution; provided, however, that such statement, analysis and arguments may be waived with the unanimous consent of all the landowners of the territory proposed to be annexed to the Community Facilities District and shall be so stated in the resolution adopted by the City Council calling the election.

(5) The official ballot to be mailed or delivered by the City Clerk to each landowner-voter shall have printed or typed thereon the name of the landowner-voter and the number of votes to be voted by the landowner-voter, and shall have appended to it a certification to be signed by the person voting the official ballot which shall certify that the person signing the certification is the person who voted the official ballot, and if the landowner-voter is other than a natural person, that he or she is an officer of or other person affiliated with the landowner-voter entitled to vote such official ballot, that he or she has been authorized to vote such official ballot on behalf of the landowner-voter, that in voting such official ballot it was his or her intent, as well as the intent of the landowner-voter, to vote all votes to which the landowner-voter is entitled based on its

land ownership on the proposition set forth in the official ballot as marked thereon in the voting square opposite such proposition, and further certifying as to the acreage of the landowner-voter's land ownership within the territory proposed to be annexed to the Community Facilities District.

(6) The return identification envelope delivered by the City Clerk to each landowner-voter shall have printed or typed thereon the following: (i) the name of the landowner, (ii) the address of the landowner, (iii) a declaration under penalty of perjury stating that the voter is the landowner or the authorized representative of the landowner entitled to vote the enclosed ballot and is the person whose name appears on the identification envelope, (iv) the printed name and signature of the voter, (v) the address of the voter, (vi) the date of signing and place of execution of said declaration, and (vii) a notice that the envelope contains an official ballot and is to be opened only by the City Clerk.

(7) The information-to-voter form to be mailed or delivered by the City Clerk to the landowner-voters shall inform them that the official ballots shall be returned to the City Clerk properly voted as provided thereon and with the certification appended thereto properly completed and signed in the sealed return identification envelope with the certification thereon completed and signed and all other information to be inserted thereon properly inserted by 5:00 o'clock p.m. on the date of the election.

(8) Upon receipt of the return identification envelopes which are returned prior to the voting deadline on the date of the election, the City Clerk shall canvass the votes cast in the election, and shall file a statement with the City Council at its next regular meeting regarding the results of such canvass and the election.

The procedures set forth in this section for conducting the election may be modified as the City Council may determine to be necessary or desirable by a resolution subsequently adopted by the City Council.

Section 12. Rescission of Resolution No. 8286. The Resolution of Intention (Resolution No. 8286) adopted on December 21, 2021 is hereby rescinded in its entirety.

ADOPTED this 1st day of February, 2022.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

CERTIFICATE

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing resolution was regularly adopted by the City Council of said City at a regular meeting of said City Council duly held on the 1st of February, 2022 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAINED:

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of Redlands this _____ day of February, 2022.

_____
Jeanne Donaldson, City Clerk

EXHIBIT "A"

LEGAL DESCRIPTION
FOR
ANNEXATION NO. 26 TO
COMMUNITY FACILITIES DISTRICT NO. 2004-1
CITY OF REDLANDS, COUNTY OF SAN BERNARDINO
STATE OF CALIFORNIA

That property located in the City of Redlands, County of San Bernardino, State of California, identified by the following San Bernardino County Assessor's Parcel Numbers:

0167462010000	0167463020000	0167463360000
0167462020000	0167463030000	0167463370000
0167462030000	0167463040000	0167463380000
0167462040000	0167463050000	0167463390000
0167462050000	0167463060000	0167463400000
0167462060000	0167463070000	0167463410000
0167462070000	0167463080000	0167463420000
0167462080000	0167463090000	0167463430000
0167462090000	0167463100000	0167463440000
0167462100000	0167463110000	0167463450000
0167462110000	0167463120000	0167463460000
0167462120000	0167463130000	0167463470000
0167462130000	0167463140000	0167463480000
0167462140000	0167463150000	0167463490000
0167462150000	0167463160000	0167463500000
0167462160000	0167463170000	0167463510000
0167462170000	0167463180000	0167463520000
0167462180000	0167463190000	0167463530000
0167462190000	0167463200000	0167463540000
0167462200000	0167463210000	0167463550000
0167462210000	0167463220000	0167463560000
0167462220000	0167463230000	0167463570000
0167462230000	0167463240000	0167463580000
0167462240000	0167463250000	0167463590000
0167462250000	0167463260000	0167463600000
0167462260000	0167463270000	0167463610000
0167462270000	0167463280000	0167463620000
0167462280000	0167463290000	0167463630000
0167462290000	0167463300000	0167463640000
0167462300000	0167463310000	0167463650000
0167462310000	0167463320000	0167463660000
0167462320000	0167463330000	0167463670000
0167462330000	0167463340000	0167463680000
0167463010000	0167463350000	0167463690000

0167463700000
0167473010000
0167473020000
0167473030000
0167473040000
0167473050000
0167473060000
0167473070000
0167473080000
0167473090000
0167473100000
0167473110000
0167473120000
0167473130000
0167473140000
0167473150000
0167473160000
0167473170000
0167473180000
0167473190000
0167473200000
0167473210000
0167473220000
0167473230000
0167473240000
0167473250000
0167473260000
0167473270000
0167473280000
0167473290000
0167473300000
0167473310000
0167473320000
0167473330000
0167473340000
0167473350000
0167473360000
0167473370000
0167473380000
0167473390000
0167473400000
0167473410000
0167473420000
0167473430000
0167473440000
0167473450000
0167473460000
0167473470000
0167473480000
0167473490000
0167473500000
0167473510000
0167473520000
0167473530000
0167473540000
0167473550000
0167473560000
0167473570000
0167473580000
0167473590000
0167473600000
0167473610000
0167473620000
0167473630000
0167473640000
0167473650000
0167473660000
0167473670000
0167473680000
0167473690000
0167473700000
0167473710000
0167473720000
0167474010000
0167474020000
0167474030000
0167474040000
0167474050000
0167474060000
0167474070000
0167474080000
0167474090000
0167474100000
0167474110000
0167474120000
0167474130000
0167474140000
0167474150000
0167474160000
0167474170000
0167474180000
0167474190000
0167474200000
0167474210000
0167474220000
0167474230000
0167474240000
0167474250000
0167474260000
0167474270000
0167474280000
0167474290000
0167474300000
0167474310000
0167474320000
0167474330000
0167474340000
0167474350000
0167474360000
0167474370000
0167474380000
0167474390000

.

EXHIBIT "B"

RATE AND METHOD OF APPORTIONMENT OF SPECIAL TAX
COMMUNITY FACILITIES DISTRICT NO. 2004-1
OF THE CITY OF REDLANDS

A Special Tax (the "Special Tax") shall be levied on and collected from each Parcel of Taxable Property (defined below) in Community Facilities District No. 2004-1 (the "District"), in each Fiscal Year, (defined below), commencing in the Fiscal Year beginning July 1, 2004, in an amount determined by the City Council of the City of Redlands, acting in its capacity, as the legislative body of the District (hereinafter as the "Council"), by applying the rate and method of apportionment set forth below. All of the real property in the District, unless exempted by law or by the provisions herein, shall be taxed for the purposes, to the extent, and in the manner provided herein.

A. DEFINITIONS

"Additional Maintenance" means the maintenance of landscaping for Parcels assigned to a Special Tax Rate Category in addition to the Basic Maintenance, including, but not limited to, the maintenance of significant open space, citrus groves, and firebreaks and extensive medians and parkways.

"Additional Maintenance Rate Per Benefit Unit" means the Special Tax Rate per Benefit Unit that will be levied in any Fiscal Year on Parcels of Taxable Property assigned to a Special Tax Rate Category to pay the cost of Additional Maintenance, if any, for such Parcels, including, but not limited to, the City's administrative costs in levying and collecting the Special Tax and managing and administering the Additional Maintenance in such Fiscal Year.

"Basic Maintenance" means the normal maintenance of basic landscaping within the District, including, but not limited to, parkways, open space areas, medians and street trees and the associated maintenance of bushes, shrubs and ground cover.

"Base Rate Per Benefit Unit" means the Special Tax Rate per Benefit Unit that will be levied in any Fiscal Year on all Parcels of Taxable Property in the District to pay the estimated cost of the Basic Maintenance, including, but not limited to, the City's administrative costs in levying and collecting the Special Tax and managing and administering the Basic Maintenance in such Fiscal Year.

"Benefit Unit" means a Single-family residential lot or dwelling unit or the equivalent. Commercial property is assigned Benefit Units based on acreage with the basis being four (4) Benefit Units per acre, consistent with the average residential density in the City. Industrial Property is assigned Benefit Units based on acreage with the basis being two (2) Benefit Units per acre. Multi-family property is assigned 60 percent of one Benefit Unit per dwelling unit and Religious Property is assigned two (2) Benefit Units per acre.

"City" means the City of Redlands.

"Council" has the meaning set forth in the preamble.

"Commercial Property" means any Parcel that is used for the purpose of selling, distributing or furnishing a product or service.

"Development" means any approved development and/or improvement of property resulting in the recordation of a final map or the issuance of a building permit.

"District" has the meaning set forth in the preamble.

"Exempt Property" means property that is exempt from the levy of the Special Tax, including all publicly owned or dedicated property, sliver parcels, common lots, open space and any other property that cannot be developed.

"Fiscal Year" means the period from and including July 1st of any year to and including the following June 30th.

"Industrial Property" means any Parcel that is used for the purpose of manufacturing a product.

"Land Use Category" means any of the categories contained in Table 1 to which Parcels of Taxable Property are assigned consistent with the land use approvals that have been received or proposed for the Parcel as of March 1 preceding the beginning of a Fiscal Year.

"Maximum Special Tax Rate(s)" means the Maximum Special Tax Rate(s) per Benefit Unit for Parcels in all Special Tax Rate Categories that can be levied by the Council in any Fiscal Year as determined pursuant to Section C. The Maximum Special Tax Rates per Benefit Unit for Parcels in all Special Tax Rate Categories, including the Base Rate Per Benefit Unit and the Additional Maintenance Rate Per Benefit Unit, as set forth in Table 2, shall be increased by the percentage increase in the Consumer Price Index (All Items) for Los Angeles – Riverside – Orange County (1982-84 = 100) since the beginning of the preceding Fiscal Year, or by two percent (2%), whichever is greater, on July 1, 2005 for Fiscal Year 2005-06 and on each subsequent July 1 for the Fiscal Year then commencing.

"Multi-family Residential Property" means any Parcel of residential property that consists of a building or buildings comprised of attached residential units available for rental, but not purchase, by the general public and under common ownership and/or management.

"Parcel" means a lot or Parcel of land that is identified by an Assessor's Parcel Number in the Tax Assessment Roll of the County Assessor of the County of San Bernardino.

"Religious Property" means any Parcel used as a place of worship or for other religious activities.

"Single-family Residential Property" means any Parcel of residential property that is or will be improved with a building comprised of attached or detached residential units available for purchase or rent by the general public.

"Special Tax(es)" means the Special Tax to be levied in each Fiscal Year on each Parcel of Taxable Property.

"Special Tax Rate Category" means any of the categories identified in Table 2 to which Parcels of Taxable Property in a Development are assigned based on the cost of the Basic Maintenance and the cost of the Additional Maintenance, if any, which will be provided to such Parcels.

"Taxable Property" means Parcels that are not Exempt Property.

B. ASSIGNMENT TO LAND USE CATEGORY

Parcels of Taxable Property in a Development shall be assigned to the appropriate Land Use Category contained in Table 1. Such Parcels shall also be assigned to the appropriate Special Tax Rate Category contained in Table 2, based on the estimated cost for providing the Additional Maintenance, if any, to the Development. The Special Tax shall be levied upon and collected from each such Parcel for each Fiscal Year based on the Benefit Units which are assigned to the Parcel as a result of its assignment to the appropriate Land Use Category and Special Tax Rate Category, as provided in Sections C and D.

TABLE 1
Land Use Category

Land Use Category	Description	Benefit Unit(s)
1	Single-family Residential	One (1) / Residence
2	Commercial	Five (5) / Acre
3	Industrial	Two (2) / Acre
4	Multi-family Residential	Six tenths (0.6) / Residential Unit
5	Religious Property	Two (2) / Acre

C. MAXIMUM SPECIAL TAX RATES

The Maximum Special Tax Rate per Benefit Unit for each Parcel for each Fiscal Year shall be the total of the Base Rate Per Benefit Unit plus the Additional Maintenance Rate Per Benefit Unit for the Special Tax Rate Category to which the Parcel is assigned. For Fiscal Year 2004-05 the Base Rate Per Benefit Unit and the Additional Maintenance Rate Per Benefit Unit for each Special Tax Category shall be the amounts set forth in Table 2 for such Special Tax Rate Category. The Base Rates Per Benefit Unit and the Additional Maintenance Rates Per Benefit Unit for all Parcels in all Special Tax Rate Categories shall be increased by the percentage increase in the Consumer Price Index (All Items) for Los Angeles – Riverside – Orange County (1982-84 = 100) since the beginning of the preceding Fiscal Year, or by two percent (2%), whichever is greater, on July 1, 2005 for Fiscal Year 2005-06 and on each subsequent July 1 for the Fiscal Year then commencing.

TABLE 2
Maximum Special Tax Rates

Special Tax Rate Category	Maximum Rates Per Benefit Unit Base Rate	Additional Maintenance Rate
A	$250	$0
B	$250	$100
C	$250	$200
D	$250	$300
E	$250	$400
F	$250	$500
G	$250	$600
H	$250	$700
I	$250	$800
J	$250	$900
K	$250	$1,000
L	$250	$1,100
M	$250	$1,200
N	$250	$1,300
O	$250	$1,400
P	$250	$1,500
Q	$250	$1,600
R	$250	$1,700
S	$250	$1,800
T	$250	$1,900
U	$250	$2,000
V	$250	$2,100
W	$250	$2,200
X	$250	$2,300
Y	$250	$2,400
Z	$250	$2,500

The Parcels which are to be included in the District at the time of its formation and which are identified in Table 3 shall be assigned to the Land Use Category and the Special Tax Rate Category specified in Table 3.

TABLE 3
Assignment to Land Use Category
and Special Tax Rate Category

Tract No.	Land Use Category	Special Tax Rate Category
16408	One (1)	K

D. METHOD OF APPORTIONMENT AND LEVY OF ANNUAL SPECIAL TAX

For each Fiscal Year, commencing with Fiscal Year 2004-05, the Council shall (a) determine the cost of providing the Basic Maintenance in the District and the amount of the Base Rate Per Benefit Unit to be levied on Parcels of Taxable Property in the District to pay the cost of the Basic Maintenance; (b) determine the cost of providing the Additional Maintenance, if any, for each Special Tax Rate Category, as then applicable, and the amount of the Additional Maintenance Rate Per Benefit Unit, if any, to be levied on Parcels of Taxable Property in each Special Tax Rate Category to pay the cost the Additional Maintenance therefor; and (c) levy the Special Tax on all Parcels of Taxable Property in each Special Tax Rate Category, as then applicable. The amount of the Special Tax to be levied on any Parcel of Taxable Property in any Fiscal Year shall be determined by multiplying the Benefit Units for the Parcel, depending on the Land Use Category to which it is assigned, by the Base Rate Per Benefit Unit and the Additional Maintenance Rate Per Benefit Unit, if any, determined pursuant to clauses (a) and (b) above, for the Special Tax Rate Category to which the Parcel is assigned.

No Special Tax shall be levied on property which, at the time of adoption of the Resolution of Formation for the District, is Exempt Property.

E. FUTURE ANNEXATIONS

It is anticipated that additional properties will be annexed to the District from time to time. As each annexation is proposed, an analysis will be prepared to determine the types and area of landscaping to be maintained, *i.e.,* Basic Maintenance and/or Additional Maintenance, if any, and the estimated annual cost of providing the Additional Maintenance, if any, to the property. Based on this analysis, the property to be annexed will be assigned to the appropriate Special Tax Rate Category contained in Table 2.

PETITION TO THE CITY COUNCIL OF THE CITY OF REDLANDS REQUESTING INITIATION OF PROCEEDINGS FOR THE ANNEXATION OF TERRITORY TO COMMUNITY FACILITIES DISTRICT NO. 2004-1 OF THE CITY OF REDLANDS, AND CONSENTING TO THE LEVY OF SPECIAL TAXES TO PAY THE ANNUAL COSTS OF THE MAINTENANCE OF PARKWAYS (ANNEXATION NO. 26)

1. Lennar Homes of California, Inc. ("Owner"), requests that the City Council (the "City Council") of the City of Redlands (the "City") initiate proceedings pursuant to Article 3.5 (commencing with Section 53339) of Chapter 2.5 of Part 1 of Division 2 of Title 5 of the California Government Code, commonly known as the "Mello-Roos Community Facilities Act of 1982," for the annexation of the property described in Exhibit "A" attached hereto (the "Property") to "Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California" (the "CFD") for the purpose of providing for the funding, through the levy of special taxes, of the annual costs of the maintenance of perimeter lettered lots, retention basins, and street trees adjacent to Tract Map No. 20257, including but not limited to, landscape maintenance in the area of the Property and the CFD.

2. Owner represents to the City Council that it is the owner of all of the Property.

DATED: 16, December, 2021

LENNAR HOMES OF CALIFORNIA, INC.
a California corporation

By: Geoffrey L. Smith
Its: Vice President

17942.00056\34571537.1

EXHIBIT "A"

DESCRIPTION OF THE PROPERTY

The property located in the City of Redlands, County of San Bernardino, State of California identified by San Bernardino County Assessor's Parcel Nos. 0167-091-02-0000, 0167-091-04-0000, 0167-091-05-0000 and 0167-091-08-0000.

ANNEXATION MAP NO. 26

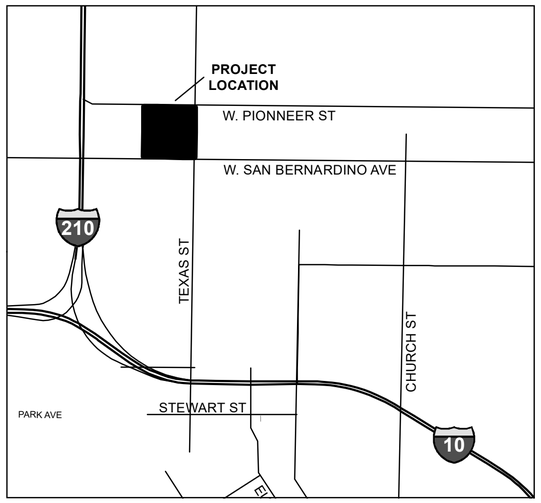
COMMUNITY FACILITIES DISTRICT NO. 2004-1 OF THE CITY OF REDLANDS, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA

THIS MAP SHOWS THE BOUNDARIES OF AREAS TO BE ANNEXED TO COMMUNITY FACILITIES DISTRICT NO. 2004-1 OF THE CITY OF REDLANDS, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA. THE BOUNDARIES OF WHICH COMMUNITY FACILITIES DISTRICT ARE SHOWN AND DESCRIBED ON THE MAP THEREOF WHICH WAS PREVIOUSLY RECORDED ON MAY 18, 2004 BOOK 76 OF MAPS OF ASSESSMENT AND COMMUNITY FACILITIES DISTRICTS, AT PAGE 94 AND AS INSTRUMENT NO. 2004-0347327 IN THE OFFICE OF THE COUNTY RECORDER OF THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA.

I HEREBY CERTIFY THAT THE WITHIN MAP OF THE AREAS TO BE ANNEXED TO COMMUNITY FACILITIES DISTRICT NO. 2004-1 OF THE CITY OF REDLANDS, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, WAS APPROVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AT A REGULAR MEETING THEREOF, HELD ON THE ____ DAY OF _____, 20___,
BY IT'S RESOLUTION NO. _____.

_____
CITY CLERK OF THE CITY OF REDLANDS

VICINITY MAP
NOT TO SCALE



LEGEND

━━━	ANNEXATION BOUNDARY
───	PARCEL BOUNDARY
XXXX-XXX-XX-XXXX	ASSESSOR'S PARCEL NUMBER

N

0 500
Feet

THIS ANNEXATION MAP CORRECTLY SHOWS THE LOT OR PARCEL OF LAND INCLUDED WITHIN THE BOUNDARIES OF THE COMMUNITY FACILITIES DISTRICT. FOR DETAILS CONCERNING THE LINES AND DIMENSIONS OF LOTS OR PARCELS REFER TO THE COUNTY ASSESSOR'S MAPS FOR FISCAL YEAR 2021-2022.

Webb MUNICIPAL FINANCE

FILED IN THE OFFICE OF THE CITY CLERK OF THE CITY OF REDLANDS THIS _____ DAY OF _____, 20____.

BY: _____
CITY CLERK OF THE CITY OF REDLANDS

SAN BERNARDINO COUNTY RECORDER'S CERTIFICATE

THIS MAP HAS BEEN FILED UNDER DOCUMENT NUMBER _____ THIS _____ DAY OF _____, 20___, AT THE HOUR OF ___ O'CLOCK __. M., IN BOOK _____ OF ____, PAGE ____. AT THE REQUEST OF _____. IN THE AMOUNT OF $ _____.

BOB DUTTON
ASSESSOR-RECORDER
COUNTY OF SAN BERNARDINO

BY: _____
DEPUTY RECORDER

APNs				
0167-462-01-0000	0167-463-11-0000	0167-463-54-0000	0167-473-27-0000	0167-473-70-0000
0167-462-02-0000	0167-463-12-0000	0167-463-55-0000	0167-473-28-0000	0167-473-71-0000
0167-462-03-0000	0167-463-13-0000	0167-463-56-0000	0167-473-29-0000	0167-473-72-0000
0167-462-04-0000	0167-463-14-0000	0167-463-57-0000	0167-473-30-0000	0167-474-01-0000
0167-462-05-0000	0167-463-15-0000	0167-463-58-0000	0167-473-31-0000	0167-474-02-0000
0167-462-06-0000	0167-463-16-0000	0167-463-59-0000	0167-473-32-0000	0167-474-03-0000
0167-462-07-0000	0167-463-17-0000	0167-463-60-0000	0167-473-33-0000	0167-474-04-0000
0167-462-08-0000	0167-463-18-0000	0167-463-61-0000	0167-473-34-0000	0167-474-05-0000
0167-462-09-0000	0167-463-19-0000	0167-463-62-0000	0167-473-35-0000	0167-474-06-0000
0167-462-10-0000	0167-463-20-0000	0167-463-63-0000	0167-473-36-0000	0167-474-07-0000
0167-462-11-0000	0167-463-21-0000	0167-463-64-0000	0167-473-37-0000	0167-474-08-0000
0167-462-12-0000	0167-463-22-0000	0167-463-65-0000	0167-473-38-0000	0167-474-09-0000
0167-462-13-0000	0167-463-23-0000	0167-463-66-0000	0167-473-39-0000	0167-474-10-0000
0167-462-14-0000	0167-463-24-0000	0167-463-67-0000	0167-473-40-0000	0167-474-11-0000
0167-462-15-0000	0167-463-25-0000	0167-463-68-0000	0167-473-41-0000	0167-474-12-0000
0167-462-16-0000	0167-463-26-0000	0167-463-69-0000	0167-473-42-0000	0167-474-13-0000
0167-462-17-0000	0167-463-27-0000	0167-463-70-0000	0167-473-43-0000	0167-474-14-0000
0167-462-18-0000	0167-463-28-0000	0167-473-01-0000	0167-473-44-0000	0167-474-15-0000
0167-462-19-0000	0167-463-29-0000	0167-473-02-0000	0167-473-45-0000	0167-474-16-0000
0167-462-20-0000	0167-463-30-0000	0167-473-03-0000	0167-473-46-0000	0167-474-17-0000
0167-462-21-0000	0167-463-31-0000	0167-473-04-0000	0167-473-47-0000	0167-474-18-0000
0167-462-22-0000	0167-463-32-0000	0167-473-05-0000	0167-473-48-0000	0167-474-19-0000
0167-462-23-0000	0167-463-33-0000	0167-473-06-0000	0167-473-49-0000	0167-474-20-0000
0167-462-24-0000	0167-463-34-0000	0167-473-07-0000	0167-473-50-0000	0167-474-21-0000
0167-462-25-0000	0167-463-35-0000	0167-473-08-0000	0167-473-51-0000	0167-474-22-0000
0167-462-26-0000	0167-463-36-0000	0167-473-09-0000	0167-473-52-0000	0167-474-23-0000
0167-462-27-0000	0167-463-37-0000	0167-473-10-0000	0167-473-53-0000	0167-474-24-0000
0167-462-28-0000	0167-463-38-0000	0167-473-11-0000	0167-473-54-0000	0167-474-25-0000
0167-462-29-0000	0167-463-39-0000	0167-473-12-0000	0167-473-55-0000	0167-474-26-0000
0167-462-30-0000	0167-463-40-0000	0167-473-13-0000	0167-473-56-0000	0167-474-27-0000
0167-462-31-0000	0167-463-41-0000	0167-473-14-0000	0167-473-57-0000	0167-474-28-0000
0167-462-32-0000	0167-463-42-0000	0167-473-15-0000	0167-473-58-0000	0167-474-29-0000
0167-462-33-0000	0167-463-43-0000	0167-473-16-0000	0167-473-59-0000	0167-474-30-0000
0167-463-01-0000	0167-463-44-0000	0167-473-17-0000	0167-473-60-0000	0167-474-31-0000
0167-463-02-0000	0167-463-45-0000	0167-473-18-0000	0167-473-61-0000	0167-474-32-0000
0167-463-03-0000	0167-463-46-0000	0167-473-19-0000	0167-473-62-0000	0167-474-33-0000
0167-463-04-0000	0167-463-47-0000	0167-473-20-0000	0167-473-63-0000	0167-474-34-0000
0167-463-05-0000	0167-463-48-0000	0167-473-21-0000	0167-473-64-0000	0167-474-35-0000
0167-463-06-0000	0167-463-49-0000	0167-473-22-0000	0167-473-65-0000	0167-474-36-0000
0167-463-07-0000	0167-463-50-0000	0167-473-23-0000	0167-473-66-0000	0167-474-37-0000
0167-463-08-0000	0167-463-51-0000	0167-473-24-0000	0167-473-67-0000	0167-474-38-0000
0167-463-09-0000	0167-463-52-0000	0167-473-25-0000	0167-473-68-0000	0167-474-39-0000
0167-463-10-0000	0167-463-53-0000	0167-473-26-0000	0167-473-69-0000	

M:\GIS-Assessment\Redlands\CFD2004-1_Annex26.mxd

RESOLUTION NO. 8286

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS DECLARING INTENTION TO ANNEX TERRITORY TO COMMUNITY FACILITIES DISTRICT NO. 2004-1 OF THE CITY OF REDLANDS AND ADOPTING A MAP OF THE AREA PROPOSED TO BE ANNEXED THERETO (ANNEXATION NO. 26)

WHEREAS, the City Council (the "City Council") of the City of Redlands (the "City") has established Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California (the "Community Facilities District") for the purpose of levying special taxes on parcels of taxable property therein for the purpose of providing certain services which are necessary to meet increased demands placed upon the City as a result of the development of said real property; and

WHEREAS, it is necessary that certain parcels of property be annexed to the Community Facilities District in order that they may be developed and receive the benefit of services which will be financed by the annual levy of special taxes on said property sufficient to pay the costs of such services and costs incidental thereto; and

WHEREAS, the current Rate and Method of Apportionment of Special Tax (the "Rate and Method") set forth in Exhibit "B" hereto, requires that Special Tax for all parcels increase annually in accordance with the Los Angeles-Riverside-Orange County Consumer Price Index (the "LRO Index"); and

WHEREAS, the LRO Index no longer exists and has been replaced by the Riverside-San Bernardino-Ontario Consumer Price Index (the "RSO Index"); and

WHEREAS, it is necessary for the Rate and Method to be modified to reference the RSO Index, as the LRO Index no longer exists; and

WHEREAS, the City Council is authorized by Article 3.5 (commencing with Section 53339) of Chapter 2.5 of Part 1 of Division 2 of Title 5 of the California Government Code, commonly known as the "Mello-Roos Community Facilities Act of 1982," to annex territory to the Community Facilities District by complying with the procedures set forth in said Article 3.5;

NOW, THEREFORE, BE IT RESOLVED, DETERMINED AND ORDERED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. Recitals. The above recitals are true and correct and are hereby incorporated into this resolution.

Section 2. Name of District. The name of the existing Community Facilities District is "Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California."

Section 3. Amendment of Rate and Method. The reference to the "Los Angeles-Riverside-Orange County" Consumer Price Index in Section C of the Rate and Method is hereby replaced with the "Riverside-San Bernardino-Ontario Consumer Price Index." No other portion of the Rate and Method shall be amended.

Section 4. Intention. The City Council declares its intention to conduct proceedings pursuant to said Article 3.5 for the annexation to the Community Facilities District of the territory described in Exhibit "A" attached hereto. The City Council determines that the public convenience and necessity require that such territory be annexed to the Community Facilities District.

Section 5. Description of Territory Proposed To Be Annexed; Annexation Map. The territory which is included in the Community Facilities District is described on the map of the Community Facilities District recorded on May 18, 2004 in Book 76 of Maps of Assessment and Community Facilities Districts, page 94, and as Instrument No 2004-0347327 in the official records of the County of San Bernardino. The territory proposed to be annexed to the Community Facilities District is described in Exhibit "A" attached hereto and by this reference made a part hereof. Such territory is also shown and described on the map thereof entitled "Annexation Map No. 26, Community Facilities District No. 2004-1 of the City of Redlands, County of San Bernardino, State of California," which is on file with the City Clerk (the "Annexation Map").

Section 6. Types of Services; Incidental Expenses; Plan for Providing Services. The services to be provided and financed by the Community Facilities District are the maintenance of perimeter lettered lots, retention basins, and street trees adjacent to Tract Map No. 20257, including but not limited to, landscape maintenance in the area of the Property and the Community Facilities District. The Community Facilities District shall also finance costs associated with the determination of the amount of and the levy and collection of special taxes which are levied to provide such services and costs otherwise incurred in order to carry out its authorized purposes. The services described above shall be provided, as needed, throughout the Community Facilities District and the territory proposed to be annexed thereto for the benefit of all owners of property and residents of the Community Facilities District and the territory proposed to be annexed thereto. All owners of taxable parcels of property within the Community Facilities District and the territory proposed to be annexed thereto shall pay special taxes at the same rate to finance the annual cost of providing such services. The services to be provided and financed by the Community Facilities District, as previously described, are necessary to meet increased demands placed upon the City as a result of development occurring within the Community Facilities District and the territory proposed to be annexed thereto.

Section 7. Special Taxes. Except where funds are otherwise available, special taxes sufficient to pay the costs of the services described in Section 6 above and the annual administrative expenses of the City and the Community Facilities District in determining, apportioning, levying and collecting such special taxes, shall be annually levied within the territory proposed to be annexed to the Community Facilities District. Pursuant to Section 53340 of the California Government Code, the special taxes shall be collected in the same manner as ordinary ad valorem property taxes are collected and shall be subject to the same penalties and the same procedure, sale, and lien priority in case of delinquency as is provided for ad valorem

taxes. The rates and method of apportionment of said special taxes shall be as set forth in Exhibit "B" attached hereto and by this reference made a part hereof. The property within the territory proposed to be annexed shall be assigned at the rate set forth for Special Tax Rate Category B as set forth in Exhibit "B" attached hereto and for Fiscal Year 2022-23, and each Fiscal Year thereafter, assessed at the rate set forth in Table 2 in Exhibit "B" attached hereto, subject to annual increases beginning in Fiscal Year 2023-24 by the greater of 2% or the percentage increase in the Consumer Price Index as determined pursuant to the method of apportioning such special taxes set forth in said Exhibit "B".

Section 8. Adoption of Annexation Map. Pursuant to Section 3110.5 of the Streets and Highways Code, the City Council adopts the Annexation Map as the map of the area proposed to be annexed to the Community Facilities District. Pursuant to Section 3111 of said Code, the City Clerk shall file the original of the Annexation Map in her office and shall file a copy of the Annexation Map with the County Recorder of the County of San Bernardino no later than 15 days prior to the date of the hearing specified in Section 9 hereof.

Section 9. Hearing. A public hearing on the proposed annexation of said territory to the Community Facilities District shall be held at 6:00 p.m., or as soon thereafter as the matter may be heard, on February 1, 2022 in the Council Chambers at the City of Redlands Civic Center, 35 Cajon Street, Redlands, California, or via teleconference as directed by the City due to COVID-19 social distancing guidelines.

Section 10. Notice. The City Clerk shall publish a notice of the time and place of said hearing as required by Section 53322 of the California Government Code, and shall also give notice of the hearing by first class mail to each registered voter and landowner within the territory proposed to be annexed to the Community Facilities District as prescribed by Section 53339.4 of said Code. Said notice shall be published at least seven (7) days and mailed at least fifteen (15) days before the date of the hearing and shall contain the information required by said Section 53339.4.

Section 11. Description of Voting Procedures. The voting procedures to be followed in conducting the election on the proposition with respect to the levy of special taxes within the territory proposed to be annexed to the Community Facilities District to shall be as follows:

(a) If at the time of the close of the public or protest hearing (hereinafter referred to as the "protest hearing") at least 12 persons are registered to vote within the territory proposed to be annexed to the Community Facilities District, the election shall be conducted by the City Clerk, and shall be held on a date selected by the City Council in conformance with the provisions of Section 53326 of the California Government Code ("Section 53326") and pursuant to the applicable provisions of law regulating elections of the City, insofar as they may be applicable, and pursuant to Section 53326 the ballots for the election shall be distributed to the qualified electors of the territory proposed to be annexed to the Community Facilities District by mail with return postage prepaid and the election shall be conducted as a mail ballot election.

(b) If at the time of the close of the protest hearing, and for at least the preceding 90 days, less than 12 persons have been registered to vote within the territory proposed to be annexed to the Community Facilities District, and pursuant to Section 53326, the vote is

therefore to be by the landowners of that territory, with each landowner of record at the close of the protest hearing having one vote for each acre or portion of an acre of land that he or she owns, the election shall be conducted by the City Clerk as follows:

(1) The election shall be held on the earliest date following the conclusion of the protest hearing upon which it can be held pursuant to Section 53326 which may be selected by the City Council, or such earlier date as the owners of land within the territory proposed to be annexed to the Community Facilities District and the City Clerk agree and concur is acceptable.

(2) Pursuant to Section 53326, the election may be held earlier than 90 days following the close of the protest hearing if the qualified electors of the territory proposed to be annexed to the Community Facilities District waive the time limits for conducting the election set forth in Section 53326 by unanimous written consent and the City Clerk concurs in such earlier election date as shall be consented to by the qualified electors.

(3) Pursuant to Section 53326, ballots for the election shall be distributed to the qualified electors by the City Clerk by mail with return postage prepaid or by personal service.

(4) Pursuant to applicable provisions of law regulating elections of the City which govern the conduct of mail ballot elections, and Division 4 (commencing with Section 4000) of the California Elections Code with respect to elections conducted by mail, the City Clerk shall mail or deliver to each qualified elector an official ballot in a form specified by the City Council in the resolution calling the election, and shall also mail or deliver to all such qualified electors a ballot pamphlet and instructions to voter, including a sample ballot identical in form to the official ballot but identified as a sample ballot, a statement pursuant to Section 9401 of the said Code, an impartial analysis by the City Attorney pursuant to Section 9280 of the said Code with respect to the ballot proposition contained in the official ballot, ballot arguments and rebuttals, if any, pursuant to Sections 9281 to 9287, inclusive, of said Code, a return identification envelope with prepaid postage thereon addressed to the City Clerk for the return of voted official ballots, and a copy of this resolution; provided, however, that such statement, analysis and arguments may be waived with the unanimous consent of all the landowners of the territory proposed to be annexed to the Community Facilities District and shall be so stated in the resolution adopted by the City Council calling the election.

(5) The official ballot to be mailed or delivered by the City Clerk to each landowner-voter shall have printed or typed thereon the name of the landowner-voter and the number of votes to be voted by the landowner-voter, and shall have appended to it a certification to be signed by the person voting the official ballot which shall certify that the person signing the certification is the person who voted the official ballot, and if the landowner-voter is other than a natural person, that he or she is an officer of or other person affiliated with the landowner-voter entitled to vote such official ballot, that he or she has been authorized to vote such official ballot on behalf of the

landowner-voter, that in voting such official ballot it was his or her intent, as well as the intent of the landowner-voter, to vote all votes to which the landowner-voter is entitled based on its land ownership on the proposition set forth in the official ballot as marked thereon in the voting square opposite such proposition, and further certifying as to the acreage of the landowner-voter's land ownership within the territory proposed to be annexed to the Community Facilities District.

(6) The return identification envelope delivered by the City Clerk to each landowner-voter shall have printed or typed thereon the following: (i) the name of the landowner, (ii) the address of the landowner, (iii) a declaration under penalty of perjury stating that the voter is the landowner or the authorized representative of the landowner entitled to vote the enclosed ballot and is the person whose name appears on the identification envelope, (iv) the printed name and signature of the voter, (v) the address of the voter, (vi) the date of signing and place of execution of said declaration, and (vii) a notice that the envelope contains an official ballot and is to be opened only by the City Clerk.

(7) The information-to-voter form to be mailed or delivered by the City Clerk to the landowner-voters shall inform them that the official ballots shall be returned to the City Clerk properly voted as provided thereon and with the certification appended thereto properly completed and signed in the sealed return identification envelope with the certification thereon completed and signed and all other information to be inserted thereon properly inserted by 5:00 o'clock p.m. on the date of the election.

(8) Upon receipt of the return identification envelopes which are returned prior to the voting deadline on the date of the election, the City Clerk shall canvass the votes cast in the election, and shall file a statement with the City Council at its next regular meeting regarding the results of such canvass and the election.

The procedures set forth in this section for conducting the election may be modified as the City Council may determine to be necessary or desirable by a resolution subsequently adopted by the City Council.

ADOPTED this 21st day of December, 2021.

Paul T. Barich, Mayor

ATTEST:

Jeanne Donaldson, City Clerk

CERTIFICATE

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing resolution was regularly adopted by the City Council of said City at a regular meeting of said City Council duly held on the 21st of December, 2021 by the following vote:

AYES:	Councilmembers Tejeda, Davis, Guzman-Lowery; Mayor Barich
NOES:	None
ABSENT:	Councilmember Foster
ABSTAINED:	None

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of Redlands this 21st day of December, 2021.

Jeanne Donaldson, City Clerk

EXHIBIT "A"

LEGAL DESCRIPTION
FOR
ANNEXATION NO. 26 TO COMMUNITY
FACILITIES DISTRICT NO. 2004-1
CITY OF REDLANDS, COUNTY OF SAN BERNARDINO
STATE OF CALIFORNIA

The property located in the City of Redlands, County of San Bernardino, State of California identified by San Bernardino County Assessor's Parcel Nos. 0167-091-02-0000, 0167-091-04-0000, 0167-091-05-0000 and 0167-091-08-0000.

EXHIBIT "B"

RATE AND METHOD OF APPORTIONMENT OF SPECIAL TAX
COMMUNITY FACILITIES DISTRICT NO. 2004-1
OF THE CITY OF REDLANDS

A Special Tax (the "Special Tax") shall be levied on and collected from each Parcel of Taxable Property (defined below) in Community Facilities District No. 2004-1 (the "District"), in each Fiscal Year, (defined below), commencing in the Fiscal Year beginning July 1, 2004, in an amount determined by the City Council of the City of Redlands, acting in its capacity, as the legislative body of the District (hereinafter as the "Council"), by applying the rate and method of apportionment set forth below. All of the real property in the District, unless exempted by law or by the provisions herein, shall be taxed for the purposes, to the extent, and in the manner provided herein.

A. DEFINITIONS

"Additional Maintenance" means the maintenance of landscaping for Parcels assigned to a Special Tax Rate Category in addition to the Basic Maintenance, including, but not limited to, the maintenance of significant open space, citrus groves, and firebreaks and extensive medians and parkways.

"Additional Maintenance Rate Per Benefit Unit" means the Special Tax Rate per Benefit Unit that will be levied in any Fiscal Year on Parcels of Taxable Property assigned to a Special Tax Rate Category to pay the cost of Additional Maintenance, if any, for such Parcels, including, but not limited to, the City's administrative costs in levying and collecting the Special Tax and managing and administering the Additional Maintenance in such Fiscal Year.

"Basic Maintenance" means the normal maintenance of basic landscaping within the District, including, but not limited to, parkways, open space areas, medians and street trees and the associated maintenance of bushes, shrubs and ground cover.

"Base Rate Per Benefit Unit" means the Special Tax Rate per Benefit Unit that will be levied in any Fiscal Year on all Parcels of Taxable Property in the District to pay the estimated cost of the Basic Maintenance, including, but not limited to, the City's administrative costs in levying and collecting the Special Tax and managing and administering the Basic Maintenance in such Fiscal Year.

"Benefit Unit" means a Single-family residential lot or dwelling unit or the equivalent. Commercial property is assigned Benefit Units based on acreage with the basis being four (4) Benefit Units per acre, consistent with the average residential density in the City. Industrial Property is assigned Benefit Units based on acreage with the basis being two (2) Benefit Units per acre. Multi-family property is assigned 60 percent of one Benefit Unit per dwelling unit and Religious Property is assigned two (2) Benefit Units per acre.

"City" means the City of Redlands.

"Council" has the meaning set forth in the preamble.

"Commercial Property" means any Parcel that is used for the purpose of selling, distributing or furnishing a product or service.

"Development" means any approved development and/or improvement of property resulting in the recordation of a final map or the issuance of a building permit.

"District" has the meaning set forth in the preamble.

"Exempt Property" means property that is exempt from the levy of the Special Tax, including all publicly owned or dedicated property, sliver parcels, common lots, open space and any other property that cannot be developed.

"Fiscal Year" means the period from and including July 1st of any year to and including the following June 30th.

"Industrial Property" means any Parcel that is used for the purpose of manufacturing a product.

"Land Use Category" means any of the categories contained in Table 1 to which Parcels of Taxable Property are assigned consistent with the land use approvals that have been received or proposed for the Parcel as of March 1 preceding the beginning of a Fiscal Year.

"Maximum Special Tax Rate(s)" means the Maximum Special Tax Rate(s) per Benefit Unit for Parcels in all Special Tax Rate Categories that can be levied by the Council in any Fiscal Year as determined pursuant to Section C. The Maximum Special Tax Rates per Benefit Unit for Parcels in all Special Tax Rate Categories, including the Base Rate Per Benefit Unit and the Additional Maintenance Rate Per Benefit Unit, as set forth in Table 2, shall be increased by the percentage increase in the Consumer Price Index (All Items) for Los Angeles – Riverside – Orange County (1982-84 = 100) since the beginning of the preceding Fiscal Year, or by two percent (2%), whichever is greater, on July 1, 2005 for Fiscal Year 2005-06 and on each subsequent July 1 for the Fiscal Year then commencing.

"Multi-family Residential Property" means any Parcel of residential property that consists of a building or buildings comprised of attached residential units available for rental, but not purchase, by the general public and under common ownership and/or management.

"Parcel" means a lot or Parcel of land that is identified by an Assessor's Parcel Number in the Tax Assessment Roll of the County Assessor of the County of San Bernardino.

"Religious Property" means any Parcel used as a place of worship or for other religious activities.

"Single-family Residential Property" means any Parcel of residential property that is or will be improved with a building comprised of attached or detached residential units available for purchase or rent by the general public.

"Special Tax(es)" means the Special Tax to be levied in each Fiscal Year on each Parcel of Taxable Property.

"Special Tax Rate Category" means any of the categories identified in Table 2 to which Parcels of Taxable Property in a Development are assigned based on the cost of the Basic Maintenance and the cost of the Additional Maintenance, if any, which will be provided to such Parcels.

"Taxable Property" means Parcels that are not Exempt Property.

B. ASSIGNMENT TO LAND USE CATEGORY

Parcels of Taxable Property in a Development shall be assigned to the appropriate Land Use Category contained in Table 1. Such Parcels shall also be assigned to the appropriate Special Tax Rate Category contained in Table 2, based on the estimated cost for providing the Additional Maintenance, if any, to the Development. The Special Tax shall be levied upon and collected from each such Parcel for each Fiscal Year based on the Benefit Units which are assigned to the Parcel as a result of its assignment to the appropriate Land Use Category and Special Tax Rate Category, as provided in Sections C and D.

TABLE 1
Land Use Category

Land Use Category	Description	Benefit Unit(s)
1	Single-family Residential	One (1) / Residence
2	Commercial	Five (5) / Acre
3	Industrial	Two (2) / Acre
4	Multi-family Residential	Six tenths (0.6) / Residential Unit
5	Religious Property	Two (2) / Acre

C. MAXIMUM SPECIAL TAX RATES

The Maximum Special Tax Rate per Benefit Unit for each Parcel for each Fiscal Year shall be the total of the Base Rate Per Benefit Unit plus the Additional Maintenance Rate Per Benefit Unit for the Special Tax Rate Category to which the Parcel is assigned. For Fiscal Year 2004-05 the Base Rate Per Benefit Unit and the Additional Maintenance Rate Per Benefit Unit for each Special Tax Category shall be the amounts set forth in Table 2 for such Special Tax Rate Category. The Base Rates Per Benefit Unit and the Additional Maintenance Rates Per Benefit Unit for all Parcels in all Special Tax Rate Categories shall be increased by the percentage increase in the Consumer Price Index (All Items) for Los Angeles – Riverside – Orange County (1982-84 = 100) since the beginning of the preceding Fiscal Year, or by two percent (2%), whichever is greater, on July 1, 2005 for Fiscal Year 2005-06 and on each subsequent July 1 for the Fiscal Year then commencing.

TABLE 2
Maximum Special Tax Rates

Special Tax Rate Category	Maximum Rates Per Benefit Unit: Base Rate	Maximum Rates Per Benefit Unit: Additional Maintenance Rate
A	$250	$0
B	$250	$100
C	$250	$200
D	$250	$300
E	$250	$400
F	$250	$500
G	$250	$600
H	$250	$700
I	$250	$800
J	$250	$900
K	$250	$1,000
L	$250	$1,100
M	$250	$1,200
N	$250	$1,300
O	$250	$1,400
P	$250	$1,500
Q	$250	$1,600
R	$250	$1,700
S	$250	$1,800
T	$250	$1,900
U	$250	$2,000
V	$250	$2,100
W	$250	$2,200
X	$250	$2,300
Y	$250	$2,400
Z	$250	$2,500

The Parcels which are to be included in the District at the time of its formation and which are identified in Table 3 shall be assigned to the Land Use Category and the Special Tax Rate Category specified in Table 3.

TABLE 3
Assignment to Land Use Category
and Special Tax Rate Category

Tract No.	Land Use Category	Special Tax Rate Category
16408	One (1)	K

D. METHOD OF APPORTIONMENT AND LEVY OF ANNUAL SPECIAL TAX

For each Fiscal Year, commencing with Fiscal Year 2004-05, the Council shall (a) determine the cost of providing the Basic Maintenance in the District and the amount of the Base Rate Per Benefit Unit to be levied on Parcels of Taxable Property in the District to pay the cost of the Basic Maintenance; (b) determine the cost of providing the Additional Maintenance, if any, for each Special Tax Rate Category, as then applicable, and the amount of the Additional Maintenance Rate Per Benefit Unit, if any, to be levied on Parcels of Taxable Property in each Special Tax Rate Category to pay the cost the Additional Maintenance therefor; and (c) levy the Special Tax on all Parcels of Taxable Property in each Special Tax Rate Category, as then applicable. The amount of the Special Tax to be levied on any Parcel of Taxable Property in any Fiscal Year shall be determined by multiplying the Benefit Units for the Parcel, depending on the Land Use Category to which it is assigned, by the Base Rate Per Benefit Unit and the Additional Maintenance Rate Per Benefit Unit, if any, determined pursuant to clauses (a) and (b) above, for the Special Tax Rate Category to which the Parcel is assigned.

No Special Tax shall be levied on property which, at the time of adoption of the Resolution of Formation for the District, is Exempt Property.

E. FUTURE ANNEXATIONS

It is anticipated that additional properties will be annexed to the District from time to time. As each annexation is proposed, an analysis will be prepared to determine the types and area of landscaping to be maintained, *i.e.,* Basic Maintenance and/or Additional Maintenance, if any, and the estimated annual cost of providing the Additional Maintenance, if any, to the property. Based on this analysis, the property to be annexed will be assigned to the appropriate Special Tax Rate Category contained in Table 2.

"A City That Works"

City Council/Successor Agency Meeting **I. 5.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Disclosure of Agreement of Settlement and General Release - Sally Young; San Bernardino County Superior Court Case No. CIVDS1910352 (City Attorney McHugh)

DISCUSSION:

Attached is a copy of the "Agreement of Settlement and General Release," which reflects the terms and conditions for settlement of the above mentioned litigation as authorized by the City Council. In accordance with the City's Municipal Code, and following the spirit of the Brown Act, this matter is on your agenda to notify the public of the settlement negotiated by the City. The litigation involved an injury from a bicycle riding incident and was settled for the amount of $17,500.

SUBMITTED BY:
Jimmy Nguyen, Administrative Analyst

REVIEWED BY:
Charles M. Duggan, Jr., City Manager
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager

Attachments

Settlement and General Release Agreement

AGREEMENT OF SETTLEMENT AND GENERAL RELEASE

1. *PARTIES*: The parties to this Agreement of Settlement and General Release ("Agreement") are Sally Young ("Plaintiff"), and City of Redlands ("Defendants").

2. *RECITALS*: This Agreement is made with reference to the following facts:

2.1 Certain disputes and controversies have arisen between the parties hereto.

2.2 Such disputes and controversies include, but are not limited to, the claims, demands and case or causes of action set forth by the parties hereto in a civil action pending in the San Bernardino County Superior Court and entitled Sally Young v. City of Redlands, Case No. CIVDS 1910352.

2.3 It is the intention of the parties hereto to settle and dispose of, fully and completely, any and all claims, demands and cause or causes of action existing as of the effective date of this agreement and arising out of, connected with, or incidental to the dealings between parties hereto to the effective date hereof including, without limitation on the generality of the foregoing, any and all claims, demands and cause or causes of action reflected in the civil action referenced in Paragraph 2.2 above.

3. *DISMISSAL*: Concurrently with the execution of this Agreement, Plaintiff shall dismiss, with prejudice, the civil action referenced in Paragraph 2.2 above, in exchange for the promises, covenants, conditions and payments set forth in Paragraph Four.

4. *PAYMENT*: Concurrently with the execution of this Agreement, Defendant shall pay to Plaintiff, the aggregate sum of Seventeen Thousand, Five Hundred Dollars ($17,500.00).

5. *GENERAL RELEASE*: In consideration of the mutual general releases contained herein, and for other good and valuable consideration, the receipt of which is acknowledged by each party hereto, the parties promise, agree and generally release as follows:

5.1 Except as to such rights or claims as may be created by this Agreement, each party hereto hereby releases, remises and forever discharges each other party hereto from any and all claims, demands and cause or causes of action existing as of the effective date and arising out of, connected with or incidental to the dealings between the parties hereto prior to the effective date hereof including, without limitation on the generality of the foregoing, any and all claims, demands and cause or causes of action reflected in the civil action referenced in Paragraph 2.2 above.

5.2 Each party to this Agreement specifically waives the benefit of provisions of Section 1542 of the Civil Code of the State of California, as follows:

A general release does not extend to claims which the creditor does not know or suspect to exist in his or her favor at the time of executing the release, which if known by him or her must have materially affected his or her settlement with the debtor.

6. *REPRESENTATIONS AND WARRANTIES*: Each of the parties to this Agreement represents and warrants to, and agrees with, each party hereto, as follows:

6.1 Each party has received independent legal advice from its attorneys with respect to the advisability of making the settlement provided for herein, with respect to the advisability of executing this Agreement, and with respect to the meaning of California Civil Code Section 1542.

6.2 No party (nor any officer, agent, employee, representative, or attorney of or for any party), has made any statement or representation or failed to make any statement or representation to any other party regarding any fact relied upon in entering into this Agreement, and each party does not rely upon any statement, representation, omission or promise of any other party (or of any officer, agent, employee, representative, or attorney of or for any party), in executing this Agreement, or in making the settlement provided for herein, except as expressly stated in this Agreement.

6.3 Each party to this Agreement has made such investigation of the facts pertaining to this settlement and this Agreement, and all the matters pertaining thereto, as it deems necessary.

6.4 Each party or responsible officer thereof has read this Agreement and understands the contents hereof. Each of the officers executing this Agreement on behalf of their respective corporations is empowered to do so and thereby binds such respective corporation.

6.5 In entering into this Agreement and the settlement provided for herein, each party assumes the risk of any misrepresentation, concealment or mistake. If any party should subsequently discover that any fact relied upon by it in entering into this Agreement was untrue, or that any fact was concealed from it, or that its understanding of the facts or of the law was incorrect, such party shall not be entitled to any relief in connection therewith including, without limitation on the generality of the foregoing, any alleged right or claim to set aside or rescind this Agreement. This Agreement is intended to be and is final and binding between the parties hereto, regardless of any claims of misrepresentation, promise made without the intention to perform, concealment of fact, mistake of fact or law, or of any other circumstance whatsoever.

6.6 Each party has not heretofore assigned, transferred, or granted, or purported to assign, transfer, or grant, any of the claims, demands, and cause or causes of action disposed of by this Agreement.

6.7 Each term of this Agreement is contractual and not merely a recital.

6.8 Each party is aware that it may hereafter discover claims or facts in addition to or different from those it now knows or believes to be true with respect to the matters related herein. Nevertheless, it is the intention of the parties to fully, finally and forever to settle and release all such matters, and all claims relative thereto, which do now exist, may exist, or heretofore have existed between them. In furtherance of such intention, the releases given herein shall be and remain in effect as full and complete mutual releases of all such matters, notwithstanding the discovery of existence of any additional or different claims of facts relative thereto.

6.9 The parties will execute all such further and additional documents as shall be reasonable, convenient, necessary or desirable to carry out the provisions of this Agreement.

6.10 Plaintiff agrees to hold Defendant harmless from, and defend and indemnify Defendant from, the claims of any and all medical care providers and/or lienholders, including, but not limited to, Medicare or MediCal, providing medical services to Plaintiff as a result of the subject accident.

7. *SETTLEMENT*: This Agreement effects the settlement of claims which are denied and contested, and nothing contained herein shall be construed as an admission by any party hereto of any liability of any kind to any other party. Each of the parties hereto denies any liability in connection with any claim and intends hereby solely to avoid litigation and buy its peace.

8. *MISCELLANEOUS*:

8.1 This Agreement shall be deemed to have been executed and delivered within the State of California and the rights and obligations of the parties hereto shall be construed and enforced in accordance with, and governed by, the laws of the State of California.

8.2 This Agreement is the entire Agreement between the parties with respect to the subject matter hereof and supersedes all prior and contemporaneous oral and written agreements and discussions. This Agreement may be amended only by an agreement in writing, signed by the parties thereto.

8.3 This Agreement is binding upon and shall inure to the benefit of the parties hereto, their respective agents, employees, representatives, officers, directors, divisions, subsidiaries, affiliates, assigns, heirs, successors in interest and shareholders.

8.4 Each party has cooperated in the drafting and preparation of this Agreement. Hence, in any construction to be made of this Agreement, the same shall not be construed against any party.

8.5 In the event of litigation relating to this Agreement, the prevailing party shall be entitled to attorney's fees and costs.

8.6 This Agreement may be executed in counterparts, and when each party has signed and delivered at least one such counterpart, each counterpart shall be deemed an original, and, when taken together with other signed counterparts, shall constitute one Agreement, which shall be binding upon and effective as to all parties.

8.7 The parties expressly agree that the Court shall retain jurisdiction over the terms of this settlement and shall specifically retain jurisdiction to entertain a motion to enforce the settlement should the need for such a motion arise.

This Agreement, consisting of four pages, is made and entered into on and as of 1/14/2022, in Redlands, California, and is effective as of this date.

ID 1i76IkgmEcC92PfDKAAU82QX

SALLY YOUNG, Plaintiff

CITY OF REDLANDS

BY: _____

PAUL BARICH, Mayor

ATTEST

BY: _____

JEANNE DONALDSON, City Clerk

APPROVED AS TO FORM AND CONTENT:

1/14/2022

KYLE L. PEDERSON
Attorney for Plaintiff Sally Young

1/20/22

BRUCE E. DISENHOUSE
Attorney for Defendant City of Redlands

"A City That Works"

City Council/Successor Agency Meeting **J. 1.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Discussion and possible action regarding the renaming of Shoppers Lane, and consideration of Resolution No. 8302 (Mayor Barich)

MOTION:

I move to approve Resolution No. 8302.

DISCUSSION:

This item is being put forth to City Council to allow for discussion and possible action regarding the renaming of Shoppers Lane. The proposal is to consider changing the street name to Rivera Street in honor of Constable Jose Apollo Rivera.

SUBMITTED BY:
Mayor Paul Barich

Attachments

Redlands World War I-Excerpt
Jose Apollo Story
Resolution No. 8302

Book excerpt from “Redlands in World War I” by: Ann Cordy Deegan, Maria Carrillo Colato, Nathan D. Gonzales, and Don McCue (pages 108-110).

Although Gen. Pershing largely resisted French and British requests to place American divisions under their command, there were a couple of exceptions. The 27th (New York) Division was loaned to the British, fighting at Ypres in July and helping break the vaunted German Hindenburg Line on the Somme in September. Serving in the 27th (New York) division was Redlander Ronaldo Rivera, who went by the nickname Babe. The son of famous Redlands Constable José Rivera, Ronaldo left his art studies in New York City to volunteer with the New York Division. Soon after arriving on the Western Front Corporal Rivera was wounded in the left arm by a piece of shrapnel at Ypres. He recovered in time to participate in the massive British and Australian effort to crack the Hindenburg Line on September 27. Nine days later he would write his parents a vividly descriptive letter about his experiences.

It was a drizzly dawn, very foggy about 5:30 A.M. when three blasts from some unknown whistle gave the final signal for “our over-the-top.” At the second our artillery opened up I wish you could’ve heard it. Wow! I’ll never forget it – I thought hell had broken loose. Well it was up and at it men, so on, on we went with howls and yells just like so many wild Indians.

Of course about this time with Fritzies looming up in all sides with machine guns, to say nothing about many of my comrades falling on all sides of me, you can imagine I was pretty excited and mad. So I stopped the second, lighted a cigarette which gave me 100% more “pep” and nerve to carry on. I was leading a combat group of about 10 men. The corporal senior who was leading about 2 feet ahead of me was shot through the head, so I was ordered to carry on in his place. Twice before we came to Jerry’s trench we were held up by machine gun nests and fights. Soon we arrived at his trench, puffing like stabbed pigs, jumped in, bayonets fixed, and routed it – ordered the dugout cleared. You ought to have seen the way the devils poured out, about 25 of them, that many about in each. Well they were sent back; we didn’t kill any. We hadn’t much time to linger as we had to follow our barrage. The way the Devils get down on their knees and beg and say Kamerad!

Well, I only got a quarter of a mile farther, as we engaged in a terrific encounter with the Jerries in a fight to the death. The trouble with the advance was that the Americans advanced too fast; some of them were killed and wounded by their own barrage. I thought we were going too slow but found out to my chagrin that we were far too much in advance, so we soon found ourselves isolated.

I tried to continue the advance but was driven back each time. Myself and another chap made a forward move from shellhole to shellhole. Zing! Zing! machine gun bullets sang past our heads – one struck my helmet, making a deep dent in it. At this time things were growing more and more serious with each minute. We made a few brief observations to see if we were near any of our men, but we were not. We were cut off and soon to be outflanked, and as sure as the sun comes up we were, within a very few minutes later. I told the rest of the men that we were in for a h____ of a battle and that we must be game and all stick together. No sooner had I said that than I heard loud yelling, singing and threats, and looking up out of one of our shells holes, lo and behold I saw about 50 Fritzies closing in on us, camouflaged with bushes and sticks around their waists and nearly each and every one of them had a machine gun.

There were only ten of us. Imagine standing off a mob more fully equipped than we, at a number of 5 to 1. In another second one of the many bloodcurdling fights for life was at its best. We stood to and let

them have it. We had only two machine guns, but we held our own until all our men but two were killed, myself and a bugler from K company, so realizing our plight we hastened to retreat. We did and as I was going from one shellhole to one farther in the rear, the devil of a Hun shot me with a machine gun bullet in the left leg about 3 inches above the ankle, fracturing the shinbone.

The bugler from K company was shot in the left hand, smashing it quite a bit. By some hook or crook, they must have thought there were more of us and didn't come to carry-on, so we beat it. We lay from eight A.M. to 9:30 P.M. in a shellhole right in the midst of the Huns machine gun nests. We were found by a band of Australians, whom we Americans think are the best ever; they are wonderful chaps. We were taken to their dugout, kept and fed until the day after, then removed by their stretcher bearers. Don't worry because I am in England now, away from the terrible war and having the best of treatment.

In recognition of his bravery at the Hindenburg Line, Babe Rivera was awarded the Belgian Croix de Guerre, the French Croix de Guerre and the British Distinguished Service Medal, thereby becoming the most decorated Redlander to serve in World War I. For some reason Rivera did not receive an equivalent heroism medal from his own government. The shattered leg never fully healed and he was awarded a 25% disability pension.

J.A. Rivera: Redlands' First Constable

By Bobbie Monk
Redlands Daily Facts
May 16, 2009

The law came to Redlands before Redlands existed in the form of Jose Apollo Rivera. He not only became the first constable for the emerging city, but he remained in that elected position for 46 years. But prior to that stint, and after as well, his life was not totally quiet.

Rivera was born in an adobe home on the Vejar land just north of what is now the city of Pomona. His parents were Jose A. Rivera and Gertrudes Valdez, descendants of Spanish dons. One of his grandmothers, Manuela Duarte, was a descendant of the Duarte family for which the city of Duarte is named. The family moved to San Bernardino and lived on a ranch at what is now 10th Street and Arrowhead Avenue. It was there he attended school, and he learned to plow, herd cows, and ride broncos.

His father died while he was still very young, and at the age of 14, with his mother's approval, he traveled to Salt Lake City to drive cattle. He also attended school for three winters in that city. In the summer, he drove cattle, moving herds from Nevada to Wyoming. The wild country through which the herds moved were the setting for some exciting times, including twice narrowly missing being massacred by Indians.

Returning to Redlands in 1879, he worked at a variety of jobs. He helped survey the road from San Bernardino to Barstow with Santa Fe survey parties and was foreman of a gang laying pipelines to Moreno (Valley) with the Bear Valley Water Co.

This all occurred around the time Judson and Brown were beginning to lay out the future township of Redlands. He worked on the Stillman Ranch, now the University of Redlands, for two years, then bought a half interest in the first meat market in Redlands. Later, in partnership with his brother, A.A. Rivera, he established the Pioneer Transfer Co.

According to information in "The Golden Jubilee," published in 1938, Rivera got into a political argument with a candidate for constable in 1888. Rivera threatened to run against the candidate and win. Scipio Craig, editor of the Citrograph, and some other friends heard of the boast and persuaded him to run. He did and received more votes than the other candidates put together. This was in November 1888, just weeks before the city of Redlands incorporated. Rivera was nominated for marshal of the new city, but declined. Later he was urged more than once to run for sheriff of San Bernardino County, but declined, feeling his duty was with Redlands.

Rivera had been elected county constable of the Crafton District before Redlands became a city. A few months after incorporation, Sheriff Seymour appointed him constable for Redlands Township. He was later elected to that post in 1890 and was reelected every four years thereafter until he retired in 1935. retired in 1935. There were no cars with sirens then. Rivera patrolled the city and the mountain areas on horseback, seeking horse thieves, handling domestic quarrels and hunting lawbreakers.

Nathan Gonzales, archivist in the Heritage Room of the A.K. Smiley Public Library, wrote about Rivera in the Redlands Daily Facts in 2004. He noted that in Rivera's long career of law enforcement, he was never known to have fired his gun in the line of duty, but he brought in the criminals anyway.

In her book, "On the Banks of the Zanja," Edith Parker Hinkley wrote that there "Would have been more trouble than there was, except the presence of Rivera was in itself a deterrent to wrongdoing. His sturdy form radiated both authority and friendliness and his personality was unmatched for maintaining law and order." Rivera also served as Spanish interpreter for the city, and continued to do so after his retirement. He also had time then to work in his garden. Rivera was a Mason for nearly 50 years, a member of the Independent Order of Odd Fellows and the First Baptist Church.

Rivera was married to Mary Preciado, another native Californian, and they had three children, R.J. Rivera who moved to Santa Barbara and was a salesman for Goodyear Co.; Rolando Rivera, a commercial artist of New York who married Lelane Clark, a Metropolitan Opera singer; and A.E. (Fonce) Rivera of Pasadena, who managed a Nash Shoe Store. Their one grandson, Robert, is the son of R.J. Rivera. Jose and Mary lived for a half century in their home at 308 Grant St. A picture of Rivera, painted by his son Rolando, still hangs in the Redlands Police Annex, the former City Hall, on Cajon Street. Additionally, the award given annually to the law enforcement officer of the year has been named the Jose Apollo Rivera award.

Rivera was proud to say that, throughout his nearly half century of law enforcement, he never arrested a man who failed to vote for him afterward.

RESOLUTION NO. 8302

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS COMMEMORATIVELY RENAMING "SHOPPERS LANE" AS "RIVERA STREET"

WHEREAS, a report has been prepared and submitted by Mayor Paul T. Barich requesting the commemorative street renaming of "Shoppers Lane" as "Rivera Street" in honor of Constable Jose Apollo Rivera; and

WHEREAS, California Government Code Section 34091.1 allows a jurisdiction, by resolution, to name a new public street or to rename an existing public street; and

WHEREAS, the naming of a new public street or the renaming of an existing public street is exempt from review under the California Environmental Quality Act of 1970 ("CEQA") pursuant to section 15061(b)(3) of the State's Guidelines implementing CEQA;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. In accordance with Government Code Section 34091.1, and pursuant to Street and Highways Code sections 970.5, 971, and 5026, the City Council hereby directs that the street presently designated as "Shoppers Lane" be renamed as "Rivera Street."

Section 2. Pursuant to Government Code section 34092, and Street and Highways Code section 5026, the City Council hereby directs the City Clerk to promptly forward copies of this Resolution to the Board of Supervisors, Clerk, and Surveyor, for the county of San Bernardino.

Section 3. The City's Municipal Utilities and Engineering Department staff is hereby directed to prepare new street signs and take all appropriate and necessary actions to implement this Resolution and the street name change.

ADOPTED, SIGNED AND APPROVED this 1st day of February, 2022.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

L:\ca\Reso\8302 Shoppers Lane Street Name Change.docx

"A City That Works"

City Council/Successor Agency Meeting **J. 2.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Discussion and possible action relating to City Council compensation and consideration of Ordinance No. 2886 adjusting compensation for City Council Members (Mayor Pro Tem Tejeda)

MOTION(S):

If the City Council concurs with Mayor Pro Tem Tejeda's recommendation, the following motion is provided:

Mayor requests the City Clerk to read the title of Ordinance No. 2886.

I move to waive further reading of Ordinance No. 2886 and to introduce Ordinance No. 2886.

RECOMMENDATION:

It is recommended that the City Council introduce Ordinance No. 2886, increasing compensation for City Council Members effective following the next municipal election.

DISCUSSION:

Government Code section 36516 permits the City Council to increase salary by 5 percent for each calendar year from the operative date of the last adjustment of the salary presently in effect. The City Council set its current salary at $500 per month in February 1986. Because 36 years will have passed since February 4,1986, Government Code section 36516 permits the Council to increase its salary by 180 percent (36 years x 5 percent) in January 2023. The maximum increase would amount to $900 for a total monthly compensation of $1,400. However, the Council may choose a lower amount if desired. A City Council member may also waive any or all of the compensation permitted by Government Code section 36516.

Government Code section 36516.5 prohibits any change in compensation during a Council Member's term of office. This does not mean that a Council Member elected in 2022 must wait until his or her next term of office begins in 2026. Because Council members serve staggered terms, all Council Members would be eligible for an increase following the next municipal election in 2022, even though some Council Members are in the middle of their own terms.

Should the City Council wish to move forward in adjusting its compensation, staff has prepared Ordinance No. 2886 which would increase the compensation for City Council Members to the maximum amount allowed of $1,400 per month effective the first pay period in January 2023. For comparison purposes, staff surveyed cities in San Bernardino County in addition to California General Law cities with similar population to Redlands. The survey information is provided in the attachments to this staff report.

ALTERNATIVES:

The Council could reject this proposed ordinance or set the compensation at a lower amount.

STRATEGIC PLAN:

Not Applicable

SUBMITTED BY:
Mayor Pro Tem Tejeda

Fiscal Impact

Discussion:
The proposed ordinance will have no impact until salary increases become effective in January 2023. Thereafter, the City Council's total compensation will increase by $4,500 per month if Ordinance No. 2886 is adopted as proposed.

Attachments

1. SB Cities Council Member Compensation
2. CA General Law Cities with similar population

2886 Amending 2.02 City Council Compensation Legislative

2886 Amending 2.02 City Council Compensation Clean

SAN BERNARDINO COUNTY CITIES				
City	Councilmember	Mayor	Auto Allowance	Population
Adelanto	$ 708			35,147
Apple Valley	$ 811			74,350
Barstow	$ 504			24,205
Big Bear Lake	$ 600			5,189
Chino	$ 1,281	$ 1,534		88,184
Chino Hills	$ 827			82,661
Colton	$ 400	$ 400	$ 220	54,198
Fontana	$ 1,755	$ 3,500		213,944
Grand Terrace	$ 300			12,399
Hesperia	$ 300			96,053
Highland	$ 796			55,060
Loma Linda	$ 1,067			24,895
Montclair	$ 742	$ 1,042		39,598
Needles	$ 12			5,353
Ontario	$ 1,885	$ 3,181	$ 500	182,004
Rancho Cucamonga	$ 1,383	$ 1,533		175,131
Redlands	$ 500			71,154
Rialto	$ 1,600	$ 4,002		102,567
San Bernardino	$ 500	$ 725		216,291
Twentynine Palms	$ 465			29,967
Upland	$ 500			78,513
Victorville	$ 943			127,170
Yucaipa	$ 500			55,634
Yucca Valley	$ 489			22,330

CALIFORNIA GENERAL LAW CITIES WITH SIMILAR POPULATION (65,000 - 85,000)				
City	Councilmember	Mayor	Auto Allowance	Population
Baldwin Park	$ 600	$ 600		75,935
Bellflower	$ 1,470			75,162
Brentwood	$ 939	$ 939		66,097
Camarillo	$ 1,480			69,521
Davis	$ 1,366			68,805
Dublin	$ 1,285			64,695
Lake Elsinore	$ 620			71,747
Lakewood	$ 1,660			80,048
Lynwood	$ 975			69,772
Madera	$ 500			66,172
Milpitas	$ 904			75,663
Perris	$ 1,342			80,067
Pittsburg	$ 500			72,622
Pleasanton	$ 1,202			78,371
Ranch Cordova	$ 500			76,166
Rocklin	$ 685			70,159
South San Francisco	$ 1,000			66,558
Turlock	$ 500	$ 500		74,820
Union City	$ 1,625			72,779
Walnut Creek	$ 650			69,936
Yorba Linda	$ 500			68,027
Yuba	$ 600			66,444

ORDINANCE NO. 2886

AN ORDINANCE OF THE CITY OF REDLANDS AMENDING CHAPTER 2.02 OF THE REDLANDS MUNICIPAL CODE RELATING TO CITY COUNCIL COMPENSATION

THE CITY COUNCIL OF THE CITY OF REDLANDS DOES ORDAIN AS FOLLOWS:

Section 1. Chapter 2.02.050 of the Redlands Municipal Code, titled "Compensation; Increase Procedure," is hereby deleted in its entirety, and hereby rewritten to read as follows:

"2.02.050: COMPENSATION; INCREASE PROCEDURE:

~~The compensation may be increased to amounts in excess of the salaries specified in such schedule or decreased below such scheduled amounts by an affirmative vote of the majority of the electors of the city voting at a municipal election.~~

A. The compensation of city council members may be increased beyond the amount provided in section 2.02.030 of this Chapter by an ordinance, or by an amendment to an ordinance, but the amount of the increase may not exceed an amount equal to five percent (5%) for each calendar year from the operative date of the last adjustment of the salary in effect when the ordinance, or ordinance amendment, is enacted. No salary ordinance shall be enacted or amended which provides for automatic future increases in salary.

B. Pursuant to City of Redlands Ordinance No. 2886 adopted in accordance with this Section 2.02.030, and notwithstanding any other provision of this Chapter, the compensation of city council members shall be Fourteen Hundred Dollars ($1,400) per month, commencing with the first full City pay period after January 1, 2023."

Section 2. The Mayor shall sign this ordinance and the City Clerk shall certify to the adoption of this ordinance and shall cause it, or a summary of it, to be published once in the Redlands Daily Facts, a newspaper of general circulation within the City, and thereafter, this ordinance shall take effect as provided by law.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

ORDINANCE NO. 2886

AN ORDINANCE OF THE CITY OF REDLANDS AMENDING CHAPTER 2.02 OF THE REDLANDS MUNICIPAL CODE RELATING TO CITY COUNCIL COMPENSATION

THE CITY COUNCIL OF THE CITY OF REDLANDS DOES ORDAIN AS FOLLOWS:

Section 1. Chapter 2.02.050 of the Redlands Municipal Code, titled "Compensation; Increase Procedure," is hereby deleted in its entirety, and hereby rewritten to read as follows:

"2.02.050: COMPENSATION; INCREASE PROCEDURE:

A. The compensation of city council members may be increased beyond the amount provided in section 2.02.030 of this Chapter by an ordinance, or by an amendment to an ordinance, but the amount of the increase may not exceed an amount equal to five percent (5%) for each calendar year from the operative date of the last adjustment of the salary in effect when the ordinance, or ordinance amendment, is enacted. No salary ordinance shall be enacted or amended which provides for automatic future increases in salary.

B. Pursuant to City of Redlands Ordinance No. 2886 adopted in accordance with this Section 2.02.030, and notwithstanding any other provision of this Chapter, the compensation of city council members shall be Fourteen Hundred Dollars ($1,400) per month, commencing with the first full City pay period after January 1, 2023."

Section 2. The Mayor shall sign this ordinance and the City Clerk shall certify to the adoption of this ordinance and shall cause it, or a summary of it, to be published once in the Redlands Daily Facts, a newspaper of general circulation within the City, and thereafter, this ordinance shall take effect as provided by law.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

"A City That Works"

City Council/Successor Agency Meeting **K. 1.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: **PUBLIC HEARING** to consider Resolution No. 8292 (General Plan Amendment No. 144) and adoption of the 2021-2029 Housing Element (6th Cycle Housing Element Update) to the 2035 General Plan, and an Addendum to the previously-certified 2035 General Plan Environmental Impact Report
(Mayor to declare meeting open as a public hearing)
(Development Services Director Desatnik)

PROCEDURE FOR PUBLIC HEARING:

1. Mayor declares the meeting open as a public hearing.
2. Mayor calls upon Department Director for report.
3. Mayor calls for questions/comments from members of the City Council.
4. Mayor calls for comments/questions/testimony from members of the public (3 minutes per speaker).
5. Mayor calls upon City Clerk to note any written comments received.
6. Mayor closes the public hearing.
7. City Council considers the motion and votes.

MOTION(S):

If the City Council determines that the Planning Commission's recommendation is appropriate, the following motion is provided:

I move that the City Council adopt Resolution No. 8292 to adopt the 6th Cycle 2021 - 2029 Housing Element for the City of Redlands General Plan, and an Addendum to the previously-certified 2035 General Plan Environmental Impact Report.

RECOMMENDATION:

On January 11, 2022, the Planning Commission reviewed the revised Draft Housing Element Update (including revisions as requested by HCD) and adopted Resolution No. 1565 recommending that the City Council adopt the 2021-2029 Housing Element. The Commission also recommended adoption of the proposed Addendum to the previously-certified General Plan Environmental Impact Report. If the City Council determines that the Planning Commission's recommendation is appropriate, staff recommends that City Council adopt Resolution No. 8292.

DISCUSSION:

The Housing Element is one of seven (7) mandatory elements of a General Plan, as required by State law. As a component of the City of Redlands General Plan, the Housing Element Update presents a comprehensive set of housing policies and actions for the current planning period of 2021 through 2029 (October 15, 2021 – October 15, 2029). It builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production (building on the 5th Cycle Housing Element). This 6th Cycle Housing Element retains many of the goals, policies, and relevant implementation programs that were previously adopted. The Housing Needs Assessment contains updated statistics and analyses based on data from the 2010 U.S. Census and the American Community Survey, as well as a revised inventory of sites to meet the Regional Housing Needs Assessment. New updates for the 6th Cycle include analysis pertaining to compliance with AB 686, known as Affirmatively Furthering Fair Housing (AFFH).

A) Analysis

The 6th Cycle 2021-2029 Housing Element update (the “project”) was prepared by Michael Baker International, the City’s contracted consulting firm, in close collaboration with City staff. The 6th Cycle Housing Element identifies and establishes housing policies with respect to meeting the housing needs of existing and future residents in Redlands. It establishes housing policies that will guide City decision-making and sets forth an action plan to implement the City’s housing goals over the next eight years. A copy of the draft Housing Element attached to this report (see Attachment A).

The project addresses the following topics as required by State law:

- Population growth and employment trends;
- Household characteristics;
- Housing costs and vacancy rates;
- Inventory of available sites for housing;

- Governmental and nongovernmental constraints to housing production;
- Special housing needs (including seniors, persons with disabilities, developmental disabilities, farm workers, homeless, and female heads of households);
- Energy conservation measures; and,
- Existing affordable housing developments.

In accordance with State law (Gov. Code 65588(a)), the primary purpose of the Housing Element update is to: 1) review and update, as necessary, the City's housing goals, objectives, and policies to maintain consistency with and to aid in achieving State housing goals; 2) evaluate the effectiveness of the element during the prior planning period; and 3) review the City's progress in implementing the current Housing Element. At this time, the State's deadline to adopt the 6th Cycle Housing Element Update (without potential penalties imposed on the City for missing the deadline) is February 12, 2022.

B) Regional Housing Needs Assessment (RHNA)

California's housing element law acknowledges that, in order for the private market to adequately address the housing needs and demands of Californians, local governments must adopt plans and regulatory systems that provide opportunities for housing development. As a result, housing policy in California rests largely on the effective implementation of local housing elements and identification of land for each jurisdiction's RHNA allocation. However, the State also recognizes that local governments have no control over the housing market. Therefore, the State mandate for RHNA allocation is a "planning target" and not a "building quota." Thus, while the City is required to identify land for housing, the City is not required to enforce actual construction of the units.

The RHNA is an estimate or projection of future housing needs during a specified planning period for all income levels in a jurisdiction, and is required by State law. The State utilizes a top-down process for RHNA allocations whereby HCD distributes RHNA allocations to the Metropolitan Planning Organization (MPO) in each region, and the MPO then distributes the regional RHNA to each jurisdiction within that region. SCAG is the MPO for the Southern California six County regions, and was responsible for allocating RHNA to the City of Redlands.

The RHNA allocation process for the 6th Cycle Housing Element was robust and controversial due to the fact that all regions in the state received significantly higher RHNA allocations from HCD than previous cycles. Consequently, jurisdictions in the State are tasked to plan for a significantly higher RHNA allocation for the 6th Cycle than previous updates. For the SCAG region, the RHNA allocation distributed from HCD was 1,341,827 units. Of that number, the City of Redlands received 3,516 units.

<u>Income Groups and Density Requirements</u>

A goal in planning for housing is to accommodate housing needs for all income

groups. Therefore, it is important to understand how all ranges of income groups are defined. The income groups are categorized by the household income compared to the Area Median Income ("AMI") of the County in percentages. For example, a household making an annual income that is equal to the AMI of the County makes 100% of the AMI. A household making twice the amount in an annual income compare to the AMI would be described as making 200% of the AMI; in contrast, a low-income household would be described as earning between 50% and 80% of the AMI.

In terms of household income levels relating to RHNA, the income groups are defined as the following categories:

- Very-low income: Below 50% of AMI
- Low income: 50% - 80% of AMI
- Moderate income: 80% - 120% AMI
- Above moderate income: Over 120 AMI

Furthermore, HCD sets the baseline minimum density requirements for the Low Income and Very-Low Income levels for each county in the State, but allows each jurisdiction to set its own density assumptions for the Moderate and Above Moderate income levels. For the jurisdictions within urbanized areas, which includes the City of Redlands, the default minimum density set by HCD for Low and Very-Low income levels is 30 dwelling units per acre (30 DU/acre). The City must use the State's default minimum density of 30 dwelling units per acre for the Low and Very-Low income RHNA sites, as was the case for the City's 4th and 5th Cycle Housing Elements. Table 1 shows the density requirements for all income groups for the City of Redlands.

Table 1: Minimum Density by Household Income Category

Income Level / Category	*Minimum Density (D.U. per Acre)*
Very-low income	30
Low income	30
Moderate income	12 to 30
Above moderate income	1 to 12

Table 2 presents the City's allocation of the region's housing needs by income group.

Table 2: RHNA Allocation for the City of Redlands, 2021-2029

Income Level / Category	*Number*	*Percent*
Very Low (less than 50% AMI)	967	28%
Low (50% to 80%)	615	17%
Moderate (greater than 80% to 120% AMI)	652	19%
Above Moderate (more than 120% AMI)	1,282	36%

TOTAL =	3,516	100%

Assumptions for Lower and Moderate Income Sites

HCD has the authority to reject RHNA sites proposed by the City if it deems any site to be not suitable for housing development. HCD also has the authority to request that a jurisdiction identify additional sites if it determines the proposed sites are unlikely to yield the target number of housing units (due to various reasons such as the zoning designation, development standards, existing use, or physical constraints such as irregular lot shape). In order to increase the likelihood for the City's proposed RHNA sites to be accepted, the following assumptions have been utilized for the Low Income and Moderate Income sites.

- 50% calibration factor has been applied to all parcels in the Transit Villages Specific Plan (TVSP) area due to mixed-use zoning. HCD assumes that due to the mixed-use zoning, the actual unit yield of housing units on a site will not exceed 50% of the allowable density.
- All Lower Income and Very Low Income parcels outside the TVSP will be zoned Very High Density Residential (R-3), with a density of 30 DU/acre.
- All Moderate Income parcels outside the TVSP will be zoned Medium Density Residential (R-2), except for properties with current zoning that already allows for densities above 15 DU/acre.

Additional Buffer

Recent changes to State law (Senate Bill 166 – 2017) required cities to continually maintain adequate capacity in their site inventories to meet their RHNA for all income levels. In the event that a site in the City's Housing Element land inventory is developed below the density projected in the Housing Element, or at a different income than projected, the City must have adequate sites available to accommodate the remaining balance of the RHNA. If the City does not have any additional capacity within the existing zoning, it must identify and rezone new sites that can accommodate the remaining need. For these reasons, the City is including a buffer of 20 percent above the RHNA requirement in each income category. This is reflected in Table 3 below.

Table 3: RHNA for the City of Redlands, with Buffer

	Very Low Income	*Low Income*	*Moderate Income*	*Above Moderate Income*	**Total Units**
RHNA:	967	615	652	1,282	3,516
20% Buffer:	193	123	130	256	703
Total with Buffer:	1,160	738	782	1,538	4,219

C) Housing Sites Inventory

State Law requires local governments to prepare a site inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment. This inventory is then used to identify sites that can be developed for housing within the respective planning period. The City prioritized identifying sites in areas served by existing infrastructure. Proximity to the City's primary employment centers was also considered during the selection of sites, and compatibility with adjacent land uses.

To meet the RHNA, the City has identified land available for residential development under existing and future zoning. The City is obligated to rezone land to provide for up to 4,219 units (RHNA + 20% buffer) in the near future.

Table 4 summarizes residential development potential for Accessory Dwelling Units (ADUs), pending projects, approved projects, and site capacity. The identified capacity is up to 2,610 Lower-Income units, most of which are included in the sites inventory (not including ADUs, entitled, or pending projects). The City can accommodate 1,094 Moderate income units, most of which are met on sites in the inventory. The Above-Moderate units can be fully accommodated by recently entitled and pending projects, though additional eligible vacant sites are identified to provide additional capacity (buffer), if necessary.

Table 4: Adequate Housing Sites and Numbers of Dwelling Units

Income Category:	*Lower Income*	*Moderate Income*	*Above Moderate Income*	Total
RHNA (+20% Buffer)	**1,898**	**782**	**1,538**	**4,219**
Identified Sites:	2,461	1,052	208	3,721
Accessory Dwelling Units (ADU):	69	42	9	120
Recently Entitled Projects:	80		711	971
Pending Projects:			1,325	1,325
Total Identified Capacity:	**2,610**	**1,094**	**2,253**	**5,957**
Surplus units:	712	312	715	1,737

The RHNA sites are dispersed throughout the City to avoid the over-concentration of housing in any one particular area, and to ensure housing is distributed in an equitable fashion when considering the availability and proximity of resources and services. A webmap (click here) was created to readily show the locations of all identified RHNA sites, and the map has been available on the project website since February 2021 for the public to review

and comment.

Vacant Sites vs. Non-Vacant Sites

Overall, the City can accommodate 1,760 units on vacant sites, including 682 Lower-income units. Combined with recently entitled projects (80 units) and ADUs (69 units), the City can accommodate more than 50% (or 831 of 1,582) of its entire Lower-income RHNA without relying on the use of non-vacant sites. The City can fully accommodate its Moderate and Above-Moderate income units on vacant sites, with ADUs, and by approved or proposed projects. Therefore, the City is not subject to the required findings pursuant to AB 1397.

Despite the fact that the City can accommodate most of its RHNA on vacant sites, infill on non-vacant sites presents clear opportunities and capacity for additional residential development (particularly around the planned Metrolink/Arrow light rail stations). The non-vacant sites in the City's housing site inventory have a development capacity of 1,961 units.

D) Evaluation of Housing Programs

Chapter 6 of the Draft Housing Element is an evaluation of current programs that were adopted by the City in the previous 5th Cycle Housing Element. In all, a total of 60 programs were adopted as part of the previous Housing Element Update, and are listed in Table 6.7-1 of the Draft Housing Element document which describes the programs, the target date of achieving the goal and the achievements made, followed by a concluding action of whether to continue, amend, or delete the program.

Chapter 5 of the Draft Housing Element comprises the housing goals, policies, programs, and quantified objectives for the 2021-2029 planning period. Amendments to State law and guidance from HCD urges jurisdictions to create meaningful programs with concrete and specific actions with objective and measurable performance criteria. A matrix of all proposed programs for 2021-2029 can be found in Section 5.7, Housing Programs.

E) Public Outreach

The public outreach effort for the Housing Element Update began in February 2021. This involved engaging with community members, stakeholders, and the City’s Planning Commission and City Council in identification of housing issues and involved a diversity of people in Redlands in the planning process. The public participation program included:

- An online community survey
- Stakeholder interviews
- Two virtual community workshops
- Two study sessions and one progress update presentation with the

Planning Commission
• One study session with the City Council
• Focused survey on Affirmatively Furthering Fair Housing with stakeholders and service providers

The City heard comments ranging from concerns over affordability, burdens on developers, burdens on service providers, homelessness, access to transit and services, and preference on location of future housing. Many of the programs proposed in this Housing Element Update reflect these topics. The full summary of community engagement activities and outcomes of outreach and survey results are included in Appendix C of the Draft Housing Element.

F) Comments from HCD

The City submitted the draft Housing Element Update to the California Department of Housing & Community Development (HCD) for review and comment on September 15, 2021. After HCD's receipt of the document on September 16, 2021, HCD held a subsequent meeting with the City on November 12, 2021, in order to further facilitate the review. Upon completion of the review, HCD provided a written comment letter (see Attachment B) to the City on November 15, 2021. HCD's comments identified required revisions to the draft document necessary to comply with State law.

G) Revised Draft 2021-2029 Housing Element

Staff and the consultant team have addressed all comments received from HCD for the first round of review. In accordance with HCD's requirement, a redlined version of the revised document was made available on the project website (click here) in December 2021 to allow sufficient time for the public to review the document prior to any public hearings. Notifications regarding the availability of the revised document were sent to interested individuals, as well as through postings on the City's social media platforms. Physical copies of the revised Draft Housing Element were also made available at the City Clerk's Office, the One-Stop Permit Center, and the A.K. Smiley Public Library.

H) Public Notification & Public Review

Throughout the preparation of the Housing Element Update, staff has maintained consistent communication with the public by creating a website for the project, regular postings on the City's social media platforms, issuing press releases, publishing display advertisements in the Redlands Daily Facts, provided periodic updates through a mailing (email) list of interested individuals and stakeholders, and posted information about community meetings at the City's Planning Division and City Clerk's Office.

For the Planning Commission and City Council public hearings, display ads were published in the Redlands Daily Facts at least ten days prior to each

hearing. Notifications were also provided to the public and interested individuals through the City's offices, project website, social media platforms, and the mailing (email) list.

I) Environmental Review

An Addendum (Attachment C) to the 2035 General Plan EIR is the appropriate environmental document for the 6th Cycle Housing Element Update. The 2021-2029 Housing Element will necessitate future amendments to the General Plan Land Use Map as well as the Safety Element. However, the amendments will occur in the future and are not included as part of the scope of this project. Therefore, in accordance with Section 15164(a) of the CEQA Guidelines, none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred, and an addendum to the 2035 General Plan EIR has been prepared.

ALTERNATIVES:

No alternatives are offered at this time, and staff does not recommend delaying the adoption of the 2021-2029 Housing Element. The deadline to adopt the 6th Cycle Housing Element Update is February 12, 2022, according to the California Department of Housing & Community Development.

STRATEGIC PLAN:

This item is related to Objective D-2 pertaining to the implementation of the City's affordable housing programs.

SUBMITTED BY:

Brian Desatnik, Development Services Director.

RECOMMENDED BY:

Charles M. Duggan Jr., City Manager

REVIEWED BY:

Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager

PREPARED BY:

Catherine Lin, AICP, Principal Planner

Fiscal Impact

Fiscal Year: 2019-2020

Revenue Generating: No

Appropriation Required Y/N: N

Discussion:

This project is funded by the Local Early Action Planning (LEAP) grant funded by the California Department of Housing and Community Development.

Attachments

Attachment A: Draft 6th Cycle 2021-2029 Housing Element

Attachment B: First Round HCD Comment Letter (dated Nov. 15, 2021)

Attachment C: Addendum to the Certified 2035 General Plan EIR

Attachment D: City Council Resolution No. 8292

2021-2029 Housing Element

City of Redlands

December 2021

Revised Public Review Draft

Adopted (DATE)

Prepared by: Michael Baker International

TABLE OF CONTENTS

1 Introduction 1

1.1 Purpose and Scope of the Housing Element 1

1.2 State Requirements 1

1.3 Relationship to Other General Plan Elements 3

1.4 Information Sources 4

1.5 Public Outreach 4

1.6 Document Organization 6

2 Housing Needs Assessment 8

2.1 Population and Demographics 8

2.2 Household and Family Types 13

2.3 Employment Characteristics 15

2.4 Income and Housing Costs 18

2.5 Housing Characteristics 27

2.6 Assisted Housing 35

2.7 At-Risk Housing 36

2.8 Opportunities for Energy Conservation 41

2.9 Regional Housing Needs Assessment and Special Needs 47

3 Housing Resources & Sites Inventory 63

3.1 Introduction 63

3.2 Regional Housing Needs Assessment (RHNA) 63

3.3 Credits Toward the RHNA 64

3.4 Pending Projects 65

3.5 Accessory Dwelling Units 67

3.6 Site Capacity Analysis 68

3.7 Yield Assumptions 71

3.8 Densities and Affordability 72

3.9 Size 72

3.10 Sites Inventory 73

3.11 Site Identification Criteria and Prioritization 73

3.12 RHNA Site clusters 75
3.13 Non-vacant Sites Analysis 77
3.14 Adequate Sites 91
3.15 Lower Income Shortfall 92
3.16 Financing and Other Subsidies 93

4 Constraints 98

4.1 Government Constraints 98
4.2 Non-Governmental Constraints 130

5 Quantified Objectives, Housing Goals, Policies, and Programs 136

5.1 Goal: Housing Development and Variety 137
5.2 Goal: Removal of Constraints to the Production of Housing 137
5.3 Goal: Prioritization of Housing for Lower and Moderate Income and Special Needs Populations 138
5.4 Goal: Incentivize and Preserve Housing 139
5.5 Goal: Affirmatively Furthering Fair Housing 139
5.6 Goal: Varied and Adequate Funding Sources 139
5.7 Housing Programs 140

6 Review of Past Accomplishments 164

6.1 Purpose of Review 164
6.2 Housing Production, Rehabilitation, and Conservation 164
6.3 Housing Production: 2013-2019 165
6.4 Rehabilitation 165
6.5 Conservation/Preservation 166
6.6 Effectiveness at Assistng SpEcial Needs Populations 166
6.7 Adequate Sites for 5th Cycle RHNA 167
6.8 Housing Element Programs: Assessment of Accomplishments 169

7 Affirmatively Furthering Fair Housing 188

7.1 Introduction 188
7.2 Outreach 188
7.3 Assessment of Fair Housing 192
7.4 Identification and Prioritization of Contributing Factors 258

8 EFFORTS TO ACHIEVE CITIZEN PARTICIPATION 276
8.1 On-Line Survey Results 276
8.2 Stakeholder Interviews 287
8.3 Community Workshops 294

LIST OF TABLES

Table 1-1: 2021–2029 RHNA Projection Period 3
Table 2-1: Redlands Population Since Incorporation 1888-2020 9
Table 2-2: City and County Population Trends 1990-2019 9
Table 2-3: Redlands Race & Ethnicity, 2010 and 2019 10
Table 2-4: Redlands Population Age Characteristics 2010 and 2019 11
Table 2-5: Educational Attainment in Redlands and San Bernardino County, 2011 and 2019 12
Table 2-6: School Enrollment in Redlands and San Bernardino County, 2011 and 2019 13
Table 2-7: Residence 1 Year Ago for Redlands and San Bernardino County, 2019 13
Table 2-8: Household Composition in Redlands and San Bernardino County, 2010 and 2019 14
Table 2-9: Labor Force Characteristics in Redlands and San Bernardino County, 2011 and 2019 15
Table 2-10: Civilian Labor Force Employment Characteristics in Redlands and San Bernardino County, 2010 and 2019 17
Table 2-11: Redlands Workers Job Locations, 2016 18
Table 2-12: Households by Income Group 20
Table 2-13: HCD Income Limits for San Bernardino County 21
Table 2-14: Cost Burden by Income 22
Table 2-15: Median Home Sale Prices in Nearby Communities 23
Table 2-16: Redlands Median Home Sales, 2003, 2007, 2012, 2020 23
Table 2-17: Median Gross Rents in Nearby Cities 24
Table 2-18: Zillow Rental Survey, October 2020 24
Table 2-19: Apartments.com Rental Survey, October 2020 25
Table 2-20: Maximum Funds Available for Housing, by Income Category 25
Table 2-21: Rent as a Percentage of Household Income, 2019 26
Table 2-22: Vacant Units by Type 27
Table 2-23: Substandard Housing 28
Table 2-24: Housing Type 28
Table 2-25: Housing Units by Number of Bedrooms 29
Table 2-26: Characteristics of Redlands Tenure 30
Table 2-27: Tenure by Race in 2010 31
Table 2-28: Tenure by Age of Householder, 2011 and 2019 32
Table 2-29: Vacancy Status, 2011 and 2019 33
Table 2-30: Age of Housing Units 34
Table 2-31: Housing Developments At-Risk of Conversion 37
Table 2-32: Fair Market Rents for Existing Housing in San Bernardino County 38

Table 2-33: Qualified Entities, San Bernardino County (2020) 40
Table 2-34: EMA Income Qualifications 44
Table 2-35: Housing Need by Income Level, 2017 47
Table 2-36: Redlands Regional Housing Need Allocation by Income Category SCAG Allocation, 2006-2013, 2014-2021, and 2021-2029 49
Table 2-37: Housing Units Produced in Redlands, 2014 - 2019 49
Table 2-38: Redlands Households with Special Needs, 1990-2019 50
Table 2-39: Elderly Households by Tenure, 2019 51
Table 2-40: Elderly Income Level and Tenure, 2016 52
Table 2-41: Elderly Service Organizations 53
Table 2-42: Individuals with Disabilities in Redlands 54
Table 2-43: Persons with Developmental Disabilities in Redlands 55
Table 2-44: Units with Three or More Bedrooms by Tenure 57
Table 2-46: Households below Poverty Level, 2020 58
Table 2-47: HUD 2020 Continuum of Care San Bernardino County Housing Inventory Count 58
Table 2-48: Overcrowding: Persons Per Room 62
Table 2-49: Overcrowded Housing by Tenure 62
Table 3-1: RHNA Allocation (2021-2029) 63
Table 3-2: RHNA with Buffer 64
Table 3-3: Approved Units 64
Table 3-4: Applications in Review 65
Table 3-5: Recent ADU Production 68
Table 3-6: Projected ADUs by Affordability 68
Table 3-7: Recent Multi-family Projects 69
Table 3-8: PRD Developments in R-E Zone 71
Table 3-9: Yield Assumptions 71
Table 3-10: Density and Affordability 72
Table 3-11: Identified Sites by Existing Use 78
Table 3-12: Adequate Sites 92
Table 4-1: City of Redlands: Residential Zoning Classifications 106
Table 4-2: Redlands Development Fees (Per Unit) 122
Table 4-3: Median Home Sale Prices in Redlands and Nearby Communities 132
Table 4-4: Redlands Median Home Sales, 2003, 2007, 2012, 2020 132
Table 4-5: Impact of Interest Rates on Monthly Mortgage Payments 134
Table 4-6: Impact of Interest Rates on Commercial Borrowing Costs 135
Table 5-1: Quantified Objectives, 2021-2029 136
Table 5-1: Proposed Programs 141
Exhibit 1: Quantified Objectives of the 5th Cycle Housing Element 165
Table 6-1: 5th Cycle RHNA Allocation and Production by Income Category 167
Table 6-2:5th Cycle Programs 169
Table 7-1: Census Tracts and City Region 195
Table 7-2: Dissimilarity Index, Race, 2013 and 2019 205

Table 7-3: Disability Characteristics 216
Table 7-4: CES 4.0 Scores by Census Tract 230
Table 7-5: Opportunity Map Scores and Categorization, 2021 232
Table 7-6: Access to Opportunity Indicators – City and County 236
Table 7-7: Any Housing Problem by Tenure and Race 240
Table 7-8: Housing Problems for Elderly and Large Households by Tenure 241
Table 7-9: Cost Burden by Tenure and Race 244
Table 7-10: Cost Burden for Elderly and Large Households by Tenure 245
Table 7-11: Change in Population Experiencing Homelessness, 2013 - 2020 248
Table 7-12: Regional Point in Time Count, 2019 249
Table 7-13: Identification and Prioritization of Contributing Factors 258

LIST OF FIGURES

Figure 3-1: RHNA Sites and Sewer Infrastructure 74
Figure 7-1: Census Tracts, RHNA Sites, and City Regions 194
Figure 7-2: Census Tract 06071007800 and the EVCSP 196
Figure 7-3: TVSP and RHNA Sites 199
Figure 7-4: Racial and Ethnic Majority, 2010, Redlands 201
Figure 7-5: RHNA Sites and non-White Population (2010 and 2018) 203
Figure 7-6: RHNA Units by Income and City Acreage Comparison by non-White Population 204
Figure 7-7: Median Income, 2015 - 2019 206
Figure 7-8: RHNA Sites and Low-Moderate Income Population (2011-2015) 208
Figure 7-9: RHNA Units and City Acreage by Block Group Comparison by Low to Moderate Income 209
Figure 7-10: Poverty Status, 2010-2014 and 2015-2019 210
Figure 7-11: Location of Housing Choice Vouchers, 2010, Redlands 211
Figure 7-12: Percentage of Adults Living Alone, 2015-2019 Redlands 212
Figure 7-13: Percentage of Adults Living with Spouse, 2015-2019, Redlands 213
Figure 7-14: Percentage of Children in Married-Couple Households, 2015-2019, Redlands 214
Figure 7-15: Percentage of Children in Female-Headed Households, 2015-2019, Redlands 215
Figure 7-16: RHNA Site Distribution and Population with a disability (2015-2019) 217
Figure 7-17: RHNA Units by Income and City Comparison by Disability Status 218
Figure 7-18: RHNA Sites and R/ECAPs (2021) 220
Figure 7-19: Median Income and Percent non-White and RHNA Sites 221
Figure 7-20: TCAC Education Score, 2021, Redlands 223
Figure 7-21: TCAC Economic Score, 2021, Redlands 224
Figure 7-22: Job Proximity Index, 2014-2017 Redlands 225
Figure 7-23: TCAC Environmental Score, 2021, Redlands 227
Figure 7-24: RHNA Site Distribution and CalEnviroScreen 4.0 (2021) 229
Figure 7-25: RHNA Units By Income and City Acreage by Cal Enviro Screen 4.0 Percentile 230
Figure 7-26: RHNA Sites and TCAC Composite Score (2021) 234
Figure 7-27: RHNA Units by Income and Comparison by TCAC Composite Category 235

Figure 7-28: Overpayment by Renters, 2010-2014 and 2015-2019 242
Figure 7-29: Overpayment by Homeowners, 2010-2014 and 2015-2019 243
Figure 7-30: Distribution of Overcrowded Households, 2010, Redlands 247
Figure 7-31: Communities Sensitive to Displacement, 2017, Redlands 251

APPENDICES

Appendix A: Site Inventory Map
Appendix B: Site Inventory List
Appendix C: Community Engagement

1 INTRODUCTION

1.1 PURPOSE AND SCOPE OF THE HOUSING ELEMENT

The Housing Element, a component of the City of Redlands' General Plan, presents a comprehensive set of housing policies and actions for the years 2021–2029 (October 15, 2021–October 15, 2029). It builds on an assessment of the housing needs and evaluates housing programs, available land, and constraints on housing production (5th Cycle Housing Element). This 6th Cycle Housing Element retains many of the goals, policies, and relevant implementation programs previously approved. Significant revisions have been limited to the Housing Needs Assessment, which contains updated statistics and analyses based on data from the 2010 US Census and the American Community Survey and a revised sites inventory to meet the Regional Housing Needs Allocation (RHNA).

1.2 STATE REQUIREMENTS

The California State Legislature has identified the attainment of a decent home and suitable living environment for every resident as the state's major housing goal. Recognizing the important role of local planning programs in pursuing this goal, the legislature has mandated that all cities and counties prepare a housing element as part of their comprehensive general plan. Government Code Section 65583 sets forth the specific components to be contained in a community's housing element.

The housing element is required by state law to include:

- An assessment of existing housing needs—with an analysis of housing affordability, conditions, special needs and affordable units at risk of converting to market rate—as well as projected needs as laid out in the RHNA;
- A detailed sites inventory and analysis that evaluates the jurisdiction's ability to accommodate its RHNA;
- An analysis of constraints on housing in the jurisdiction;
- Housing programs that identify adequate sites to accommodate the jurisdiction's share of the regional housing need; assist in the development of housing for very low- and low- income households; remove or mitigate governmental constraints to affordable housing; conserve and improve the existing affordable housing stock; promote equal housing opportunity; and preserve the at-risk units identified; and
- Quantified objectives that estimate the maximum number of units, by income level, to be constructed, rehabilitated, and conserved over the planning period of the element.

1.2.1 Changes in State Law Since Previous Update

The following items represent substantive changes to state law since the City's last Housing Element or which have been newly addressed in this 2021–2029 Housing Element.

- Assembly Bill (AB) 68, AB 587, AB 671, AB 881, and Senate Bill (SB) 13 further incentivize the development of accessory dwelling units (ADUs) through streamlined permits, reduced setback requirements, increased allowable square footage, reduced parking requirements, and reduced fees.
- AB 1763 requires jurisdictions to provide a density bonus to development projects that restrict 100 percent of their units as affordable to lower- and moderate-income households.
- AB 101 requires jurisdictions to allow "low barrier navigation centers" by-right in areas zoned for mixed uses and in nonresidential zones permitting multifamily uses, if the center meets specified requirements.
- AB 686 extends requirements for federal grantees and contractors to "affirmatively further fair housing," including requirements in the federal Fair Housing Act, to public agencies in California. Affirmatively furthering fair housing is defined specifically as taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity by replacing segregated living patterns with truly integrated and balanced living patterns; transforming racially and ethnically concentrated areas of poverty into areas of opportunity; and fostering and maintaining compliance with civil rights and fair housing laws.
- AB 1255 and AB 1486 seek to identify and prioritize state and local surplus lands available for housing development affordable to lower-income households.
- AB 2162 and SB 2 address various methods and funding sources that jurisdictions may use to accelerate housing production. Specifically, AB 2162 requires that supportive housing be a permitted use without discretionary review, in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.
- SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels.

1.2.2 Planning Period

The State of California now requires an update of a jurisdiction's housing element every eight years, versus every five years with prior housing element planning periods. Passage of SB 375 extended the planning period for housing elements from five years to eight years in order to align them with the regional

transportation plan (RTP) deadlines. One housing element will now be completed for every two RTPs. Thus, this Housing Element period extends from October 15, 2021, to October 15, 2029.

1.2.3 Regional Housing Needs Allocation Projection Period

A critical measure of compliance with state housing element law is the ability of a jurisdiction to accommodate its share of the region's housing need—the Regional Housing Needs Allocation (RHNA). This RHNA quantifies the need for housing in each jurisdiction in a six-county area, including the City of Redlands. In November 2012, the state approved the Southern California Association of Governments' (SCAG) RHNA plan, which covers the projection period of October 15, 2021, to October 15, 2029. Table 1-1 presents Redlands' allocation of the region's housing needs by income group as determined by SCAG.

TABLE 1-1: 2021–2029 RHNA PROJECTION PERIOD

Income Group	Redlands		SCAG Region	
	Number	Percent	Number	Percent
Very Low (<50% AMI)	967	28%	351,796	26%
Low (50-80% AMI)	615	17%	206,807	15%
Moderate (>80-120% AMI)	652	19%	223,957	17%
Above Moderate (>120% AMI)	1282	36%	559,267	42%
Total	**3,516**	**100%**	**1,341,827**	**100%**

Source: SCAG 6th Cycle Regional Housing Needs Assessment Final Allocation Plan, 2021.

1.3 RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

The housing element must be consistent with the other elements in a general plan. Redlands' first comprehensive General Plan was adopted in 1995 and has been amended numerous times since then. The Housing Element has been comprehensively updated as part of the SCAG cycles. A comprehensive update of the General Plan was adopted in December 2017. This General Plan update provides a planned blueprint for the City through the year 2035. This Housing Element is consistent with the other elements in the City's current 2035 General Plan.

Redlands conducted a comprehensive update to the General Plan in 2017. During the 2017 update, each element was updated to match existing conditions, reflect community input, and comply with recent changes to state laws.

The Housing Element will necessitate future amendments to other elements of the General Plan, in particular, the Livable Community Element, the Healthy Community Element, and the creation of a new Environmental Justice Element. Throughout the planning period, City staff will continue to review any future amendments to ensure they are internally consistent with the Housing Element.

1.3.1 Livable Community Element

The Livable Community Element acts as the City's land use element for the purposes of designating the distribution and intensity of land. When the required rezoning is conducted to accommodate the City's

RHNA, the Livable Community Element will be updated to match the final land use designations. The revised land use element will reflect the City's rezoning to accommodate the RHNA and will also be amended to add the Transit Villages Specific Plan (TVSP) as a land use designation. Additionally, the element will be updated to identify any disadvantaged "Fringe" communities, pursuant to SB 244, which are currently not defined in the General Plan. Redlands is adjacent to one disadvantaged "Fringe" community, located within what is known as the Donut Hole. It is bounded by Pioneer Avenue to the North, SR-210 to the East, San Bernardino Blvd to the South, and Alabama Street to the East.

1.3.2 Healthy Community Element

The Healthy Community Element meets the Government Code requirements for a Safety Element. As this element has been recently updated, there are no immediate changes that are required. Upon adoption of the Housing Element, the City will undertake the required update to the Healthy Community Element, as required by the Government Code.

1.3.3 Environmental Justice Element

Pursuant to SB 1000, jurisdictions that have "disadvantaged communities" must adopt a new Environmental Justice Element upon the update of two or more elements of the General Plan.

Upon the adoption of two or more General Plan element updates, the City will be required to include an Environmental Justice Element to address the needs and health of "disadvantaged communities," as defined in the state Government Code. Redlands has multiple tracts that would meet the definition of a disadvantaged community and will thus be required to adopt amendments to the General Plan addressing the needs of central and western Redlands.

1.4 INFORMATION SOURCES

The information for this Housing Element update came from a variety of sources. These include the US Census (2010), the American Community Survey (2018 and 2019), the California Department of Finance, the California Housing Partnership Corporation, SCAG pre-certified housing data, and various City databases.

1.5 PUBLIC OUTREACH

The City of Redlands made a diligent effort to encourage public participation in the development of the Housing Element. Outreach for the Housing Element update began in February 2021. This involved engaging community members, stakeholders, service providers, educators, and the City's Planning Commission and City Council in identification of housing issues and involved a diversity of people from all socioeconomic and geographic segments of the community. The public participation program included:

- **An interactive Housing Element update website** launched on February 12, 2021, linked on the City's web page, that included a project description, the City's RHNA allocation, English and Spanish versions of the Housing Needs Survey, an interactive webmap of draft RHNA sites, and contact information and mailing list sign-up. A link to the Housing Element web page was also provided on the home page of the City's website.

- **A mailing list registration** link for interested parties.
- **An online community survey** offered in English and Spanish. The City heavily promoted the surveys through repeated social media postings, email list notifications, project website, and Redlands TV station.
- **Press releases through the City's Public Information Officer** that included the web link to the Housing Element update website, links to the English and Spanish versions of the Housing Needs Survey, and the project planner's contact information. The City also posted the project information on social media platforms. The project planner sent an email to stakeholders and service clubs in the City about the website and the Housing Needs Survey. The City reposted the post every week for three weeks. Information was also made available on the City's TV station and replayed for about four months.
- **Two virtual community workshops**. The website was updated to include information about the community meetings on April 26, 2021, and May 13, 2021. Physical flyers were posted on posting locations. A display advertisement was run twice on *Redlands Daily Facts* to advertise the community meetings. Multiple social media postings about the community meetings were made on the City's social media platforms. The project planner sent emails to notify individuals on the mailing list, which included stakeholders, service clubs, and others who requested to join the mailing list.
- **Two study sessions with the Planning Commission** and additional updates to the Planning Commission held during public hearings. All public notification efforts (excluding the newspaper display ad) for the two community meetings were repeated for the City Council study session. The links to the staff report, PowerPoint presentation, and video recording were posted on the Housing Element update website a day after the study session. Emails were sent to the Housing Element update mailing list prior to the study session with links to all materials, and a follow-up email announced that the video was posted.
- **One study session with the City Council**. All public notification efforts (excluding the newspaper display ad) for the two community meetings were repeated for the Planning Commission study session. The links to the staff report, PowerPoint presentation, and video recording were posted on the Housing Element update website a day after the study session. Emails were sent to the Housing Element Update mailing list prior to the study session with links to all materials, and a follow-up email announced that the video was posted.
- **Fair housing focus interviews.** In September 2021, a focus survey regarding fair housing was sent to local service providers and stakeholders. The City made repeated efforts by email and phone to ask service providers and stakeholders to complete the survey.
- Publication of the draft Housing Element. One week prior to the initial submittal to HCD, the City posted the draft Housing Element on the City's website and notified the public of its availability via social media posts as well as email notifications to stakeholders, service clubs, and individuals

on the mailing list. The draft Housing Element has remained on the website since then. This redline draft was posted on December 21, 2021, along with HCD's November 14 comment letter.

The City heard comments ranging from concerns over affordability, burdens on developers, burdens on service providers, homelessness, access to transit and services, and preference on location of future housing. Many of the programs proposed in this Housing Element update reflect these topics. The full summary of community engagement activities and outcomes of outreach and survey results are included in Appendix C.

Throughout the project process, the Housing Element update website has been updated and expanded frequently. The website contains the project description, RHNA information, past events (including all workshops and study sessions, staff reports, videos, etc.), upcoming events, the RHNA sites interactive web map, project timeline, the draft Housing Element document and all appendices, contact information, and links to other resources to assist the public in understanding the Housing Element and RHNA.

It should be noted that due to the pandemic, City Hall was closed to all in-person services from March 2020 until May 2021. In-person public meetings did not resume until July 6, 2021.

For upcoming public hearings for the adoption of the 6th Cycle Housing Element, the City will do the following prior to the hearing date:

1. Announcement on project website
2. Multiple social media postings
3. Display ad in local newspaper
4. Physical postings of meeting notices
5. Meeting notices available at the planning counter
6. Notifications of service clubs, stakeholder groups, and interested individuals via the mailing list
7. Slide running on Redlands TV
8. Press release

1.6 DOCUMENT ORGANIZATION

Following this introduction, the Redlands Housing Element is organized into the following chapters:

- **Chapter 2, Housing Needs Assessment and Special Needs,** describes Redlands' demographic and employment trends, characteristics of the City's current housing stock, housing affordability, and energy conservation opportunities. The Housing Needs Assessment and Special Needs section explains Redlands' allocation of the regional housing need, projects housing needs, and describes the characteristics and needs of various special populations, including the elderly, people with disabilities, homeless, and single parents.

- **Chapter 3, Housing Resources and Sites Inventory**, identifies specific sites suitable for residential development to allow for a comparison of the RHNA with realistic development capacity. Environmental and infrastructure constraints on potential housing sites are also described.

- **Chapter 4, Constraints**, identifies and analyzes potential and actual constraints to housing development in Redlands, both related to governmental actions (e.g., regulatory standards) and non-governmental conditions (e.g., the housing market or construction costs).
- **Chapter 5, Quantified Objectives, Housing Goals, Policies, and Programs**, includes the goals, objectives, policies, and programs for this Housing Element planning period.
- **Chapter 6, Review of Past Accomplishments**, describes the City's accomplishments and provides an assessment of the effectiveness of the programs in the prior 5th Cycle Housing Element.
- **Chapter 7, Affirmatively Furthering Fair Housing**, includes an analysis of fair housing, contributing factors to housing problems, and action items to address them.

Appendices cover the topics of community engagement, sites inventory map, and sites inventory data.

2 HOUSING NEEDS ASSESSMENT

This section of the Housing Element consists of an analysis of demographic, economic, employment, and housing data that help identify and illustrate the housing needs in the City of Redlands. Numerous data sources were used in updating the City's Housing Element. The key data sources include:

- Census and American Community Survey (ACS) – 2019 5-year estimates
- Southern California Association of Governments pre-certified housing data
- California Department of Finance Population and Housing Estimates
- Employment Development Department, Labor Market Statistics
- US Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data
- California Department of Housing and Community Development (HCD)

2.1 POPULATION AND DEMOGRAPHICS

2.1.1 Population Growth

Since incorporation in 1888, Redlands has consistently grown over several decades, along with the surrounding areas of San Bernardino County. As shown in Table 2-1, Redlands' population grew by steady double digits each decade through most of the twentieth century and has more than tripled since 1950. This rapid growth coincides with the conversion of former citrus groves to residential and other uses and, in turn, a shift in the economic base of the community from predominantly agricultural to service-related industries. Noteworthy, the Redlands population growth has slowed to single digits since 2000. As of 2020, Redlands' population was estimated to be 73,168.

TABLE 2-1: REDLANDS POPULATION SINCE INCORPORATION 1888-2020

Year	Population	Percent Increase
1888[1]	1,000	N/A
1900	4,797	379.7%
1910	10,440	117.6%
1920	9,874	-5.4%
1930	14,162	43.4%
1940	14,324	1.1%
1950	18,429	28.7%
1960	26,829	45.6%
1970	36,355	35.5%
1980	43,619	20.0%
1990	60,394	38.5%
2000	63,591	5.3%
2010	68,747	8.1%
2020	73,168	6.4%

Sources: US Census; 2019 American Community Survey.
1. Date of incorporation for City of Redlands.

Table 2-2 compares recent population growth in Redlands and San Bernardino County since 1990. Overall, the County's population growth rate has exceeded that of the City, due primarily to its larger scale and amount of developable land. By 2045, SCAG projects that Redlands' population will grow to 80,800, a 13 percent increase between today and 2045 (i.e., an annual population growth rate of 0.5 percent per year, on average).

TABLE 2-2: CITY AND COUNTY POPULATION TRENDS 1990-2020

Jurisdiction	1990	2000	Percent Increase 1990-2000	2010	Percent Increase 2000-2010	2020	Percent Increase 2010-2020
City of Redlands	60,394	63,591	5.3%	68,747	8.1%	73,168	6.4%
San Bernardino County	1,418,380	1,709,648	20.5%	2,035,210	19.0%	2,181,654	7.2%

Sources: 1990, 2000, and 2010 US Census; 2014-2019 American Community Survey; SCAG pre-certified housing data.

2.1.2 Race and Ethnicity

Table 2-3 shows that the racial and ethnic characteristics of Redlands has changed significantly since 2010, with the percentage of Whites and Asians increasing as a proportion of the population, with American Indians/Alaskan Natives, Black/African Americans, Native Hawaiians/Other Pacific Islanders, those of

Hispanic/Latino of any race and those of Two or More Races and Others declining as a proportion of the population.

Today, Whites comprise a majority (72.5%) of Redlands' population, whereas this group represents 61.2 percent of the San Bernardino County population. Compared to Redlands, the County also has a higher percentage of Blacks/African Americans (8.3% vs. 5.4%) and those identifying as other races (17.5% vs. 7.5%). More significantly, over half (53.3%) of the County's population is Hispanic/Latino compared to 32.7 percent in Redlands. Not only did the percentage of American Indian/Alaskan Native, Native Hawaiian/Other Pacific Islander, and Other decrease as a percent of the total City population, but the actual number of persons decreased between 2010 and 2019.

TABLE 2-3: REDLANDS RACE & ETHNICITY, 2010 AND 2019

Race/Ethnicity	Redlands, 2010		Redlands, 2019		San Bernardino County, 2019	
	Number	Percent	Number	Percent	Number	Percent
American Indian /Alaskan Native	625	0.9%	332	0.47%	17,782	0.83%
Asian	5,216	7.6%	5,729	8.05%	154,332	7.18%
Black/African American	3,564	5.2%	3,870	5.44%	179,292	8.34%
Native Hawaiian/ Other Pacific Islander	235	0.3%	147	0.21%	6,838	0.32%
White	47,452	69.0%	51,653	72.55%	1,315,238	61.20%
Other	8,266	12.0%	5,346	7.51%	368,600	17.15%
Two or More Races	3,389	4.9%	4,121	5.79%	106,949	4.98%
Total	**68,747**	**100.0%**	**71,198**	**100.0%**	**2,149,021**	**100%**
Hispanic/Latino[1]	20,810	30.3%	23,261	32.67%	1,145,874	53.32%

Sources: 2010 US Census; 2014-2019 American Community Survey; SCAG pre-certified housing data.

1. Persons of Hispanic/Latino ethnicity may be of any race.

2.1.3 Age Characteristics

Between 2010 and 2019, the population percentage for most age groups shifted, with the later age ranges such as those aged 55+ experiencing the greatest growth. In 2010, these groups accounted for approximately 25 percent of the population, while in 2020 they accounted for almost 30 percent of Redlands' population. A few age groups saw slight declines in population—school-age (5-19) and most young adult populations—while the senior population in Redlands grew the most.

Overall, the median age of the City's population increased between 2010 and 2019 (to 37.2 from 36.1 years old). Whether the City's population will get older on average depends, in part, on the desire of current residents to remain in the City as they age and the availability of housing and support services that meet their changing needs.

TABLE 2-4: REDLANDS POPULATION AGE CHARACTERISTICS 2010 AND 2019

Age Range	2010		2019	
	Number	Percent	Number	Percent
0-4	4,143	6.0%	4,827	6.8%
5-14	8,987	13.1%	8,101	11.4%
15-19	5,624	8.2%	4,969	7.0%
20-24	5,704	8.3%	5,136	7.2%
25-34	8,910	13.0%	10,635	14.9%
35-44	8,471	12.3%	8,856	12.4%
45-54	9,636	14.0%	7,945	11.2%
55-64	8,294	12.1%	9,510	13.4%
65 +	8,978	13.1%	11,219	15.8%
Total	**68,747**	**100.0%**	**71,198**	**100.0%**
Median Age	36.2		37.2	

Sources: 2010 US Census; 2014-2019 American Community Survey 5 Year Estimates.

2.1.4 Educational Attainment

As of 2011, about 9 in 10 (90%) Redlands residents aged 25 and older had graduated from high school and just under 4 in 10 (37%) had a bachelor's degree or higher. These rates of educational attainment were much higher than in San Bernardino County as a whole, where 78 percent were at least high school graduates and 19 percent had a bachelor's degree or higher.

As of 2019, almost 9 in 10 (89%) Redlands residents aged 25 and older had graduated from high school, and 42 percent had a bachelor's degree or higher. These rates of educational attainment are much higher than in San Bernardino County as a whole, where 80 percent were at least high school graduates and 21 percent had a bachelor's degree or higher. These educational attainment statistics are shown in Table 2-5.

TABLE 2-5: EDUCATIONAL ATTAINMENT IN REDLANDS AND SAN BERNARDINO COUNTY, 2011 AND 2019

Education Received	Redlands, 2011		Redlands, 2019		San Bernardino County, 2019	
	Number	Percent	Number	Percent	Number	Percent
Less than 9th Grade	1,816	4.2%	1,750	3.6%	119,589	8.9%
9th-12th Grade, no diploma	2,637	6.1%	3,644	7.6%	150,652	11.2%
High School Graduate	8,473	19.6%	8,656	18.0%	355,250	26.3%
Some College, No Degree	10,246	23.7%	9,734	20.2%	329,045	24.4%
Associate's Degree	3,977	9.2%	4,252	8.8%	112,600	8.3%
Bachelor's Degree	8,560	19.8%	10,892	22.6%	183,593	13.6%
Graduate/Professional Degree	7,522	17.4%	9,237	19.2%	99,891	7.4%
Total, Age 25 and Older	**43,231**	**100.00%**	**48,165**	**100.00 %**	**1,350,620**	**100.0%**
High School Graduate or Higher	38,778	89.7%	42,771	88.8	1,080,379	80.0
Bachelor's Degree or Higher	16,082	37.2%	20,129	41.8	283,484	21.0

Sources: 2007-2011 and 2014-2019 American Community Survey.

2.1.5 School Enrollment

Total school enrollment in Redlands in 2011 was 22,223, including both public and private schools. Nursery and preschools accounted for 6 percent of the total, kindergartens about 4 percent, elementary/middle schools about 34 percent, high schools about 22 percent and colleges and graduate schools about 34 percent, as Redlands is home to the University of Redlands, a four-year liberal arts university.

Total school enrollment in Redlands in 2019 was 19,142, including both public and private schools. Nursery and preschools accounted for 6.5 percent of the total, kindergartens about 3 percent, elementary/middle schools about 32 percent, high schools about 20 percent and colleges and graduate schools about 38 percent. By comparison, as shown in Table 2-6, the County as a whole had somewhat lower percentages in nursery and preschools (about 5.2%) and in college or graduate schools (26.7%), but somewhat higher percentages in kindergartens (5.0%), elementary/middle schools (40.7%), and high schools (22.5%).

TABLE 2-6: SCHOOL ENROLLMENT IN REDLANDS AND SAN BERNARDINO COUNTY, 2011 AND 2019

School Level	Redlands, 2011		Redlands, 2019		San Bernardino County, 2019	
	Number	Percent	Number	Percent	Number	Percent
Nursery/Preschool	1,274	5.7%	1,241	6.5%	31,894	5.2%
Kindergarten	905	4.1%	560	2.9%	30,571	5.0%
Elementary School (grades 1-8)	7,626	34.3%	6,183	32.3%	251,521	40.7%
High School (grades 9-12)	4,781	21.5%	3,798	19.8%	138,712	22.5%
College or Graduate School	7,637	34.4%	7,360	38.4%	164,670	26.7%
Population Age 3 or Older and Enrolled in School	22,223	100.0%	19,142	100.0%	617,368	100.0%

Sources: 2007-2011 and 2014-2019 American Community Survey.

2.1.6 Population Stability

Table 2-7 shows that about 88 percent of the population in Redlands occupied the same house from the previous year, and about 12 percent moved to Redlands from another location during the same time period. Of the in-movers from elsewhere in the United States, over half (6.7%) moved from another location within San Bernardino County, about one-third (3.4%) moved from somewhere else in California, and the remainder (1.6%) moved from another part of the United States. Less than half of 1 percent moved from outside the United States. In San Bernardino County as a whole, a slightly lower proportion remained in the same house (86.7%), and a larger percentage relocated from elsewhere in California (4%).

TABLE 2-7: RESIDENCE 1 YEAR AGO FOR REDLANDS AND SAN BERNARDINO COUNTY, 2019

Location of Residence 1 Year ago	Redlands, 2019		San Bernardino County, 2019	
	Number	Percent	Number	Percent
Same House	62,130	88.1%	1,842,497	86.7%
Same County	4,727	6.7%	159,806	7.5%
Same State	2,375	3.4%	85,122	4.0%
Different State	1,097	1.6%	25,375	1.2%
Elsewhere (outside U.S.)	203	0.3%	9,537	0.5%
Total	**70,532**	**100.0**	**2,122,337**	**100.0**

Source: 2014-2019 American Community Survey.

2.2 HOUSEHOLD AND FAMILY TYPES

2.2.1 Household Types

In 2019, there were 24,542 households in Redlands, compared to 24,764 households in 2010, representing a 1 percent decrease, as shown in Table 2-8. Families made up over three-quarters of Redlands'

households in 2019, greater than the percentage as in 2010 (68.9%). "Families" include married couples (50% of households in 2019) and other family types, such as single parents with children (19% of households in 2019).

Non-family households accounted for slightly less than one-third of all households in the City in 2019. Most of the non-family households were single-person households (23.7% of all households) and about 6.5 percent were households with more than one person in which the household members were unrelated to one another (e.g., college students living with roommates). In the County as a whole in 2019, there was a larger percentage of family households (76%) and a smaller percentage of single-person households (18.7%).

About one third (32.7%) of Redlands households included people age 18 or younger and about 30.9 percent included some age 65 or older. In the County, the corresponding percentages were 42.6 percent (children) and 26.1 percent (seniors).

Between 2016 and 2045, SCAG projects that the number of households in Redlands will grow from 24,400 to 30,800 (a 26% increase), which is slightly lower than the County's overall projected household growth of 39 percent.

TABLE 2-8: HOUSEHOLD COMPOSITION IN REDLANDS AND SAN BERNARDINO COUNTY, 2010 AND 2019

Household Type	Redlands, 2010		Redlands, 2019		County, 2019	
	Number	Percent	Number	Percent	Number	Percent
Families	17,062	68.9%	18,541	75.55%	517,360	81.34%
Married Couple	12,374	50.0%	12,643	51.52%	331,235	52.08%
Other Families	4,688	18.9%	5,898	24.03%	44,558	7.01%
Non-Family Households	7,702	31.1%	9,150	37.28%	208,016	32.70%
Living Alone	6,083	24.6%	6,001	24.45%	118,681	18.66%
Other Non-Family Households	1,619	6.5%	3,149	12.83%	89,335	14.05%
Households with Children <18	8,598	34.7%	7,938	32.34%	266,636	41.92%
Households with Individuals 65+	6,223	25.1%	7,640	31.13%	171,073	26.90%
Total Households	**24,764**	**100.0%**	**24,542**	**100.0%**	**636,041**	**100.0%**
Average Household Size	2.68		2.79		3.29	
Average Family Size	3.21		3.36		3.76	

Sources: 2010 US Census; 2014-2019 American Community Survey.

2.2.2 Household and Family Sizes

As also shown in Table 2-8, the average non-family household size in Redlands was 2.68 persons in 2010, compared to the higher average of 2.81 persons in 2019. By comparison, the average household size in San Bernardino County in 2019 was 3.30 persons.

2.3 EMPLOYMENT CHARACTERISTICS

2.3.1 Labor Force Size and Distribution

The City's "labor force" is the number of residents who are age 16 or older who are employed or unemployed but actively seeking work. They include residents who may be employed in Redlands or elsewhere. The members of the labor force who are employed in non-military jobs are referred to as the "civilian labor force."

Table 2-9 summarizes the Redlands and San Bernardino County labor force characteristics. It shows that the City had a slightly lower labor force participation rate in 2019 (59%) as the County as a whole (60.7%), and that the City had all of its labor force in the civilian sector rather than in the military. About 3.5 percent of the City's civilian labor force was unemployed as of 2019. Females accounted for 28 percent of the City's labor force, slightly more than the County's female labor force (27.6%).

TABLE 2-9: LABOR FORCE CHARACTERISTICS IN REDLANDS AND SAN BERNARDINO COUNTY, 2011 AND 2019

	Redlands, 2011		Redlands, 2019		San Bernardino County, 2019	
	Number	Percent	Number	Percent	Number	Percent
In the Labor Force	34,518	64.1%	34,592	60.22%	1,001,647	61.51%
Civilian Labor Force	34,439	63.9%	34,581	60.20%	990,400	60.81%
Employed	31,403	58.3%	32,554	56.68%	914,514	56.15%
Unemployed	3,036	5.6%	2,027	3.53%	75,886	4.66%
Armed Forces Employment	79	0.1%	11	0.02%	11,247	0.69%
Not in the Labor Force	19,364	35.9%	22,847	39.78%	641,203	39.37%
Total Age 16 and Older	**53,882**	**100.0%**	**57439**	**100.00%**	**1,628,558**	**100.00%**
Females in the Labor Force	16,508	30.6%	16,884	29.39%	455,075	27.94%
Female Civilian Labor Force	16,476	30.6%	16,873	29.38%	454,451	27.91%
Employed	15,059	27.9%	16,040	27.93%	418,515	25.70%
Unemployed	1,417	2.6%	833	1.45%	35,936	2.21%

Sources: 2010 US Census; 2014-2019 American Community Survey.

2.3.2 Civilian Employment Profile

The occupational profile of the City's civilian labor force is significantly different from the County labor force, as shown in Table 2-10. For example, about 45 percent of employed residents in Redlands work in management, professional and related occupations, about 21 percent in sales and office occupations, and about 16 percent in services occupations. In the County, the top three occupations are management, professional and related (31%), sales and office (22%), and service occupations (18%). Redlands also has a larger percentage of its civilian labor force employed in the public sector (25.1%), and thus a smaller percentage of private wage earners than in the County as a whole. Redlands' labor force is more heavily

concentrated in the education, health, and social science sectors of the economy (34.2%) than the County's labor force (22.1%). On the other hand, the County has larger percentages of its civilian labor force in retail trade (12.9%), manufacturing (8.8%), construction (7.6%), and transportation and warehousing (9.6%) than the City.

TABLE 2-10: CIVILIAN LABOR FORCE EMPLOYMENT CHARACTERISTICS IN REDLANDS AND SAN BERNARDINO COUNTY, 2010 AND 2019

Characteristics	Redlands, 2010		Redlands, 2019		San Bernardino County, 2019	
	Number	Percent	Number	Percent	Number	Percent
Occupations						
Mgmt., Professional, & Related	14,025	44.7%	15,441	47.43%	269,769	29.50%
Service Occupations	5,053	16.1%	5,269	16.19%	170,014	18.59%
Sales and Office	7,938	25.3%	6,451	19.82%	209,911	22.95%
Construction/Maintenance	2,185	7.0%	2,136	6.56%	93,112	10.18%
Production and Transportation	2,202	7.0%	3,257	10.00%	171,708	18.78%
Total Civilian Labor Force	**31,403**	**100.0%**	**32,554**	100.00%	**914,514**	100.00%
Class of Worker						
Private Wage & Salary Workers	21,907	69.8%	23,867	73.32%	710,194	77.66%
Government Workers	7,220	23.0%	6,739	20.70%	145,087	15.86%
Self-employed Workers	2,264	7.2%	1,939	5.96%	57,817	6.32%
Unpaid Family Workers	12	0.0%	9	0.03%	1,416	0.15%
Industry Sector						
Agriculture, Forestry & Fishing	176	0.6%	128	0.39%	6,472	0.71%
Construction	1,978	6.3%	1,662	5.11%	68,852	7.53%
Manufacturing	1,885	6.0%	1,770	5.44%	77,595	8.48%
Wholesale Trade	613	2.0%	606	1.86%	30,425	3.33%
Retail Trade	3,335	10.6%	3,689	11.33%	117,137	12.81%
Transportation & Warehousing	1,504	4.8%	1,901	5.84%	92,078	10.07%
Information	569	1.8%	240	0.74%	11,123	1.21%
Finance, Insurance, etc.	1,443	4.6%	1,772	5.44%	42,448	4.64%
Professional, Scientific, etc.	3,254	10.4%	3,465	10.64%	87,366	9.55%
Education, Health & Soc. Services	10,466	33.3%	11,335	34.82%	200,674	21.94%
Arts, Entertainment, Recreation	2,746	8.7%	2,602	7.99%	84,646	9.26%
Other Services	1,247	4.0%	1,557	4.78%	46,773	5.11%
Public Administration	2,187	7.0%	1,827	5.61%	48,925	5.35%

Sources: 2010 US Census; 2019 American Community Survey 5-year estimates using groupings of 2-digit NAICS codes.

According to the 2017 US Census LODES Data, the top 10 locations for residents of the City of Redlands to work was Redlands itself, then the cities of San Bernardino, Loma Linda, Riverside, Los Angeles, Colton, Fontana, Ontario, Yucaipa, and Moreno Valley. About 22.5 percent of Redlands residents worked in the City of Redlands, while 77.5 percent commuted to other places.

TABLE 2-11: REDLANDS WORKERS JOB LOCATIONS, 2016

		Redlands, 2016	
	Place of Work	**Number**	**Percent**
1	Redlands	6,134	22.5%
2	San Bernardino	4,172	15.3%
3	Loma Linda	2,041	7.5%
4	Riverside	1,534	5.6%
5	Los Angeles	1,024	3.8%
6	Colton	667	2.4%
7	Fontana	608	2.2%
8	Ontario	518	1.9%
9	Yucaipa	500	1.8%
10	Moreno Valley	473	1.7%
	All Other Destinations	9,626	35.3%

Sources: US Census Bureau, 2017, LODES Data; Longitudinal-Employer Household Dynamics Program: https://lehd.ces.census.gov/data/lodes/

2.4 INCOME AND HOUSING COSTS

Affordable housing is key to the economic, social, and cultural vitality of any city. Therefore, one of the principal purposes of the Housing Element is to provide a picture of housing affordability for households of all income levels. It is important to distinguish between the cost of rental versus ownership housing in determining where the greatest housing need exists.

The US Census Bureau is this Housing Element's primary source of data on household income as well as other characteristics relating to housing, such as rental vs. ownership, deficiencies, and length of residence. The last Census occurred in 2010 and the next was completed in 2020. The decennial census counts all residents in the United States and asks short questions pertaining to residents' age, sex, race, ethnicity, relationship, and household tenure. Prior to the 2010 Census, a "long form" asking more detailed questions on a wide range of demographic and housing-related topics, was also distributed to a percentage of the population.

The Census Bureau began the ACS in 1996 as a way of providing communities with more detailed information in years when the census is not taken. However, starting in 2010, the Census Bureau eliminated the more detailed "long form" component of the census and moved these questions entirely to the ACS. Today the survey is conducted in all US communities, sent to a small percentage of the

population on a rotating basis. One-year estimates are available for all communities with populations greater than 65,000; these are the most current data, but also the least reliable due to smaller sample sizes. Three-year estimates are available for all communities with populations greater than 20,000. Five-year estimates are available for communities of any population; these data are the least current, but the most reliable. Unlike the decennial census, the ACS does not survey every household and therefore provides estimates instead of total counts. However, its large sample size—three million households—provides statistically valid results.

2.4.1 Income

2.4.1.1 Household Income

Median household income represents the mid-point in income for all households in the City, with half earning more and half earning less. According to the 2000 US Census, the median household income for the City of Redlands in 1999 was $48,155. In comparison, San Bernardino County had an overall median household income of $42,066, meaning that the median household income in Redlands was 14 percent higher. According to the 2019 ACS, the median household income in Redlands was $74,839. In comparison, in 2019, the County had an overall median household income of $63,362, meaning Redlands is, on average, wealthier than the County.

To determine eligibility for housing programs, both federal and state governments categorize households according to their income, in comparison to the area median income (AMI). The AMI is the median household income for a defined geographic area. AMI is determined by HUD. The following income groups are the standard categories used:

- Extremely low-income = 30 percent median or less;
- Very low-income = 31 to 50 percent;
- Low-income = 51 to 80 percent;
- Moderate-income = 81 to 120 percent; and
- Above moderate-income = 120 and over.

California only began requesting analysis of households defined as extremely low-income since the 4th Cycle Housing Element. While a city is not obligated to include a separate category of sites designated for extremely low-income households in its suitable sites inventory, the Housing Element as a whole must analyze the obstacles and needs for this category and include proposed actions and programs to meet those needs.

Table 2-12 shows the percent of City and County residents by income category. Within Redlands, the US Office of Policy Development and Research estimated there were 2,695 extremely low-income households (11% of the total), 2,185 very low-income households (9%), 2,750 low-income households (12%), 3,680 moderate-income households (15%) and 12,625 above moderate-income households (53%). In comparison, the County had a higher proportion of extremely low- to low-income residents (41%) and a lower proportion of above moderate income residents (39%) than the City (32% and 53%, respectively).

TABLE 2-12: HOUSEHOLDS BY INCOME GROUP

Income Group	Income Criteria	Redlands	San Bernardino County
Extremely low	Less than $26,200	2,695	80,790
		11.3%	13.0%
Very low	$26,200 - $37,650	2,185	73,660
		9.1%	11.8%
Low	$37,650 - $60,250	2,750	102,005
		11.5%	16.4%
Moderate	$60,250 - $90,350	3,680	124,450
		15.4%	20.0%
Above Moderate	Over $90.350	12,625	242,735
		52.7%	38.9%
Total	**--**	**23,940**	**623,640**
		100%	**100%**

Source: 2006-2017 OPR CHAS data.

Note: The moderate and above moderate income levels were extrapolated based upon the median income for each jurisdiction given with OPR CHAS data's income brackets and total households and may not correspond exactly with values given in the American Community Survey.

Income distribution data provided by the SCAG RHNA calculator provides very similar data outcomes, though structured differently. The SCAG data does not have a separate category for extremely low income; rather, the income levels defined in the calculator are very low income, low income, moderate income, and above moderate income. In Redlands, the income distribution using SCAG RHNA calculator data is shown below.

- Very Low Income – 21%
- Low Income – 13%
- Moderate Income – 16%
- Above Moderate Income – 50%

2.4.2 Limits for Housing Assistance

HCD releases income limits for every county in the state. The limits correspond to the income categories introduced above, categorized by ranges of household income. State income limits are updated based on HUD updating its Section 8 income limit levels and are adjusted to reflect the following: (1) adjustments to HUD county median income, (2) adjustments to reflect HCD's Hold Harmless Policy to maintain income category and AMI levels at their highest, and (3) calculation of California's moderate-income household levels.

Income limits for San Bernardino County as of 2021 are shown in Table 2-13.

TABLE 2-13: HCD INCOME LIMITS FOR SAN BERNARDINO COUNTY

		1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
San Bernardino County Area Median Income: $77,500	Extremely Low	16,600	19,000	21,960	26,500	31,040	35,580	40,120	44,660
	Very Low Income	27,650	31,600	35,550	39,500	42,700	45,850	49,000	52,150
	Low Income	44,250	50,600	56,900	63,200	68,300	73,350	78,400	83,450
	Median Income	54,250	62,000	69,750	**77,500**	83,700	89,900	96,100	102,300
	Moderate Income	65,100	74,400	83,700	93,000	100,450	107,900	115,300	122,750

Source: California Department of Housing and Community Development, Income Limits 2021.

2.4.2.1 Ability to Pay for Housing

In general, housing expenses (rent or mortgage payments, plus utilities) should not exceed 30 percent of a household's income in order to be considered affordable by the federal government. Households that pay over 30 percent of their income on housing are considered "overpaying" and may experience difficulty in paying for other basic necessities. For example, a household making the City of Redlands' estimated 2019 median income of $74,839 that spent more than $1,837 a month on housing (30% of income, divided by 12 months) may be paying more for housing than it can afford.

To truly evaluate housing affordability, individual circumstances and factors must be taken into account. These include long-term debt, mortgage interest rates, the number of children in a household, and other large, ongoing expenses (such as medical bills). Also, some households choose to pay over 30 percent of their income for various reasons, such as location, aesthetics, or other features. However, it is assumed that households will aim to minimize their housing costs whenever they can. Since it is impossible to take each household's individual circumstances into account, the 30 percent rule-of-thumb provides a general measure of housing affordability for the average household.

TABLE 2-14: COST BURDEN BY INCOME

Income Group	Households by Share of Income Spent on Housing Cost:						
	Total	Households Who Pay Less than 30%		Households Who Pay 30% - 50%		Households Who Overpay (50% +)	
		Count	Percent	Count	Percent	Count	Percent
<30% Area Median Income	2,100	355	17%	225	11%	1,520	72%
30-50% Area Median Income	2,139	414	19%	570	27%	1,155	54%
50-80% Area Median Income	2,980	1,170	39%	1,315	44%	495	17%
80-100% Area Median Income	2,135	1,205	56%	790	37%	140	7%
>100% Area Median Income	14,205	12,245	86%	1,690	12%	270	2%
Total (computed)	**23,559**	**15,389**		**4,590**		**3,580**	

Source: HUD CHAS, 2012-2016.

Table 2-14 shows the number of Redlands' households overpaying for housing as of 2016. In general, the higher a household's income, the smaller the percentage spent on housing. Also, extremely low- and very low-income homeowners have lower rates of overpayment compared to renters, while moderate and above-moderate income homeowners tend to have higher rates of overpayment for housing (see Table 2-15) . Overall, about 8,170 households in Redlands, or 35 percent, are considered to be overpaying for housing.

2.4.3 Housing Costs

2.4.3.1 Ownership Housing

The value of housing in Redlands has gone up dramatically since 2000. Between 2000 and 2021, median home sales prices in Redlands increased 339 percent. However, the increases in the nearby cities were even greater during these periods. In 2021, the median home sales price in Redlands was $516,219. Overall, Redlands has the highest median home sales price compared to communities nearby.

TABLE 2-16: MEDIAN HOME SALE PRICES IN REDLANDS AND NEARBY COMMUNITIES

City	2000	2012	2021	% Change 2000-2012	% Change 2012-2021	% Change 2000-2021
San Bernardino	$94,300	$119,536	$378,055	127%	316%	400%
Highland	$122,200	$180,000	$427,014	147%	237%	349%
Redlands	$152,200	$241,898	$516,219	158%	213%	339%
Yucaipa	$116,400	$190,000	$457,829	163%	240%	393%
Loma Linda	$151,300	$191,000	$499,765	126%	262%	330%

Source: DQNews.com; 2013 CityData; Zillow 2021.

To get a better sense of the dramatically fluctuating home sale prices over the last twenty years, it is useful to break down housing sales by number of bedrooms. Table 2-16 shows the median home sale prices in Redlands in 2003, 2007, 2012, and 2020.

TABLE 2-17: REDLANDS MEDIAN HOME SALES, 2003, 2007, 2012, 2020

Number of Beds	Year			
	2003	2007	2012	2020
Condominiums				
1	$100,000	$160,000	$55,000	$139,000
2	$249,500	$255,500	$97,000	$195,000
3	$225,000	$290,000	$130,000	$305,000
Single Family Homes				
1	$187,000	$382,500	$125,750	-
2	$153,000	$325,000	$165,250	$345,000
3	$220,000	$380,000	$200,000	$499,000
4	$207,000	$431,750	$280,000	$639,000
5	$610,000	$635,000	$401,000	$942,500

Sources: First American Real Estate Solutions (from County Assessor Data); HR&A, Inc; DQNews.com, 2013; Zillow 2020.

In general, the median sales prices of both single-family homes and condominiums has increased since 2003, with a dip in sales prices during 2012 during the preparation of the 5th Cycle Housing Element. In 2020, the average price of a 3-bedroom home is approximately 2.25 times more expensive than in 2003. It appears that the 2012 median home sales values reflect the catastrophic impact of the Great Recession on San Bernardino. The rapid increases between 2003 and 2007 were more than lost and 2012 values sunk below 2003 in most house sizes. Median home sale prices for 1 and 2-bedroom condos have still not fully recovered. Single-family homes values also decreased dramatically, but have more than recovered in all categories, and generally show significant appreciation over the 2007 peak. Generally, the larger the home, the greater the recovery and cost.

2.4.3.2 Rental Housing

In 2019, the ACS reported that the estimated median gross rent for housing in Redlands was $1,473. In comparison, the 2011 ACS reported a median gross rent of $1,078 signifying a general rent increase of 37 percent (in nominal dollars) between 2011 and 2019. This is a major increase in such a short time, although much less than the rate of increase in homeownership prices. Notably, this data is not differentiated by type of housing or number of bedrooms. Table 2-17, below, compares rents in Redlands to those in nearby cities.

TABLE 2-18: MEDIAN GROSS RENTS IN REDLANDS AND NEARBY CITIES

City	2007 ACS	2011 ACS	2019 ACS
San Bernardino	$850	$924	$1,103
Highland	$909	$963	$1,059
Redlands	$1,063	$1,078	$1,473
Loma Linda	$1,065	$1,117	$1,299
Yucaipa	$928	$987	$1,111
Countywide	$992	$1,092	$1,342

Sources: 2007, 2011, 2019 American Community Survey.

In 2019, the median gross rent in Redlands was about 14–39 percent higher than in neighboring jurisdictions. In 2007, the median gross rent in Redlands was 7–25 percent higher; thus, rents in Redlands have increased at a faster rate than those in nearby cities.

While rental statistics are not tracked in the same way as housing sales, it is possible to get a sense of current rents by looking through rental listings. Table 2-18 shows rental prices as posted on Zillow in October 2020. These figures represent asking rents, not actual rents, and not all available rental units are listed on Zillow. Still, many residents do use Zillow to find housing.

TABLE 2-19: ZILLOW RENTAL SURVEY, OCTOBER 2020

Number of Bedrooms	Rent Range	Median Rent
Studio	$1,500 -$1,634	$1,567
One	$1,350 - $1,825	$1,525
Two	$1,400 - $2,065	$1,795
Three	$1,800 - $2,695	$2,300

Source: Zillow, October 2020.

Table 2-19 shows rental prices as posted on Apartments.com in October 2020. Like the Zillow data, these figures are asking prices, not actual rents. Furthermore, there may be overlap between the apartments listed on Zillow and those listed on Apartments.com. Still, the median rents compare well between the two sources.

TABLE 2-20: APARTMENTS.COM RENTAL SURVEY, OCTOBER 2020

Number of Bedrooms	Rent Range		Median Rent
Studio	$950	$1,626	$1,375
One	$1,100	$1,690	$1,494
Two	$1,355	$2,039	$1,605
Three	$1,675	$2,560	$2,250

Source: Apartments.com: search results from October 2020, all Redlands apartments.

2.4.4 Affordability of Housing

Four-person households earning the 2021 median income for Redlands ($77,500) could afford to spend up to $1,938 per month on housing without being considered "overpaying." For renters, this is a straightforward calculation, but home ownership costs are less transparent. A household can typically qualify to purchase a home that is 2.5 to 3.0 times the annual income of that household, depending on the down payment, the level of other long-term obligations (such as a car loan), and interest rates. In practice, the interaction of these factors allows some households to qualify for homes priced at more than three times their annual income, while other households may be limited to purchasing homes no more than two times their annual incomes. Table 2-20 below calculates the estimated maximum affordable purchase price by household income category.

TABLE 2-21: MAXIMUM FUNDS AVAILABLE FOR HOUSING, BY INCOME CATEGORY

Household Income Category	Annual Income[1]	Maximum Affordable Rent[2]	Maximum Affordable Purchase Price[3]
30 percent of county median	$26,500	$663	$82,489
50 percent of county median	$39,500	$988	$122,956
80 percent of county median	$63,200	$1,580	$196,729
100 percent of county median	$77,500	$1,938	$241,242
120 percent of county median	$100,450	$2,511	$312,681

Source: US Department of Housing and Urban Development, 2020.

1. HCD's 2021 income limits. Assumes a four-person household.
2. Assumes 30 percent of income available for housing cost.
3. Assumes a down payment of 20%, and 30-year fixed rate mortgage at 6.0% annual interest rate.

As noted earlier, the median purchase price of a home in Redlands in 2021 was $516,219. This purchase price is too high for all but the highest of household income categories listed in Table 2-20 to afford. Indeed, households must have an income much higher than 120 percent of the County median to afford a home.

2.4.4.1 Ownership Housing

The California Association of Realtors' 2019 Q2 Housing Affordability index (HAI) reported that 50 percent of the households in San Bernardino County could afford a home selling for the region's median price. The

indices for Los Angeles, Orange, and Riverside Counties, and with the state as a whole showed affordability levels of 29, 24, 39 and 30 percent respectively, demonstrating that in 2013 housing in San Bernardino County was more affordable than in nearby regions and the state as a whole.

Home sales prices in Redlands, however, are still out of the affordable range for many families. In 2012, the median home sale price was $165,250 for a two-bedroom home and $200,000 for a three-bedroom home (Table 2-16), compared to $345,000 and $499,000 in 2019. According to Table 2-20, a family of four earning 100 percent of AMI would not be able to afford either a two-bedroom or three-bedroom home. Therefore, although Redlands is perhaps more affordable than some surrounding communities, those families earning less than 100 percent of AMI could find it quite difficult to afford a home in Redlands.

2.4.4.2 Rental Housing

For households that rent, the 2019 ACS estimated the proportion of household income spent on rent. In 2019, as shown in Table 2-21 over 50 percent of renters paid 30 percent or more of their income on rent. In comparison, the 2011 ACS reported that less than half of renters pay 30 percent or more. The increase in the number of renting households possibly overpaying for housing between 2011 and 2019 is likely strongly linked to the increase in rent over that same period.

In general, renters in Redlands experience higher levels of overpayment. According to HUD's 2017 housing data, 48 percent of renters pay 30 percent or more on housing costs, with 24 percent paying 50 percent or more. This is contrasted with homeowners, 24 percent of which pay at 30 percent or more on housing costs, and 10 percent pay 50 percent or more.

TABLE 2-22: RENT AS A PERCENTAGE OF HOUSEHOLD INCOME, 2019

	Number of Households	Percent of Population
Less than 10.0 percent	237	2.5%
10.0 to 14.9 percent	816	8.6%
15.0 to 19.9 percent	1,112	11.7%
20.0 to 24.9 percent	920	9.7%
25.0 to 29.9 percent	1,096	11.5%
30.0 to 34.9 percent	846	8.9%
35.0 to 39.9 percent	518	5.4%
40.0 to 49.9 percent	1,053	11.1%
50.0 percent or more	2,506	26.3%
Not computed	412	4.3%
Total	**9,516**	**100.0%**

Source: 2019 American Community Survey.

Assuming a four-person household would require at least a two or three bedroom apartment, the average of the Craigslist and Apartments.com median rents of $1,700 for a two-bedroom unit and $2,275 for a three-bedroom unit would only be considered affordable to residents whose incomes were at least 100

percent of AMI. Though a family of four would be considered "overcrowded" in this apartment, an extremely low-income family would not even be able afford this rent. Moreover, there may be no market rate units that are available to many very low- and extremely low-income families.

2.5 HOUSING CHARACTERISTICS

Although the characteristics of individual residents and households are important to understanding the growth and evolution of a city, the more useful unit for analysis concerning housing needs is the housing units.

2.5.1 Housing Vacancies

In 2000, 4.9 percent of housing units in Redlands were vacant. By 2010, 7.7 percent of housing units were vacant.

By 2019, Redlands had a total of 26,369 housing units, 1,827 (7.4%) of which were vacant. The homeownership vacancy rate was 2.0 percent and the rental vacancy rate was 3.9 percent. The balance consisted of units that were rented or sold but not occupied (305), or seasonal recreational, or occasional use (222), or vacant for migrant workers (86).

In terms of vacant units by type, Redlands similar vacancy rates to the SCAG region with the exception of seasonal housing where the SCAG region takes into consideration mountain, desert, and coastal communities that have larger proportions of seasonal housing.

TABLE 2-23: VACANT UNITS BY TYPE

Housing Type	Redlands 2000	Redlands 2011	Redlands 2018	SCAG Region
For Rent	46.5%	45.2%	19.3%	20.7%
Rented			8.5%	5.4%
For Sale	26.7%	19.9%	24.9%	7.9%
Sold			13.2%	4.5%
Seasonal	7.2%	8.0%	6.7%	33.5%
Migrant	0.0%	0.0%	0.0%	0.3%
Other	11.7%	16.7%	27.4%	27.7%

Source: SCAG Pre-certified housing data.

2.5.2 Substandard Housing

Table 2-23 provides a breakdown of housing units that are substandard by either not having telephone service, lacking plumbing, or lacking complete kitchen facilities. Redlands leads the SCAG region with housing units having no telephone service available; however, the percentage of households with no telephone service is under 3 percent, and the absence of telephone service does not appear to correlate with housing quality across the City. Redlands has fewer substandard housing units than the SCAG regional in terms of plumbing and kitchen facilities.

TABLE 2-24: SUBSTANDARD HOUSING

Substandard Housing Criteria	Redlands	SCAG Region
No Telephone Service	2.57%	1.95%
Lacking Plumbing Facilities	0.26%	0.39%
Lacking Complete Kitchen Facilities	0.92%	1.29%

Source: 2014-2019 American Community Survey 5-year estimates.

Data provided by code enforcement documents that over the last four years, there have been five recorded cases of substandard housing. This leads to an estimate of fewer than 10 units of substandard housing in the City.

2.5.3 Housing Type

Table 2-24 shows Redlands has a greater percentage of single-family detached housing and mobile homes than the SCAG region, but trails the SCAG region in single-family attached and multi-family units.

TABLE 2-25: HOUSING TYPE

Housing Type	Redlands	SCAG Region
Single-Family Detached	64.0%	54.4%
Single Family Attached	4.4%	7.2%
Multi-family, 2-4 Units	11.6%	7.5%
Multi-family, 5+ Units	16.0%	27.3
Mobile Homes	4.0%	3.5%

Source: SCAG pre-certified housing data.

As shown in Table 2-25, two- and three-bedroom units represented the majority of housing types in the City, though four-bedroom units are also prevalent. Units with five bedrooms or more are very uncommon, comprising just 5.9 percent of the housing stock.

TABLE 2-26: HOUSING UNITS BY NUMBER OF BEDROOMS

Number of Bedrooms	Number of Units	Percent of Total Housing Units
Studio	580	2.2%
One bedroom	2705	10.3%
Two bedrooms	7,635	29.0%
Three bedrooms	8,088	30.7%
Four bedrooms	6,056	23.0%
Five or more bedrooms	1,305	4.9%
Total	**24,280**	**100.0%**

Source: 2014-2019 American Community Survey 5-year estimates.

2.5.4 Tenure

Table 2-26 describes the tenure and the type of housing according to the 2019 ACS 5-year estimates. In 2011, there were 18,011 detached and attached single-family units. Duplexes and three- to four-unit buildings comprised 10.5 percent of the total units, and buildings of five or more units 16.7 percent of the total.

In 2019, there were 18,466 detached and attached single-family units. Duplexes and three- to four-unit buildings comprised 9.1 percent of the total units, and buildings of five or more units made up 17.6 percent of the total.

The overall tenure pattern in the City of occupied households was 61 percent owner-occupied, and 39 percent renter-occupied. Redlands' housing stock consists of 26,369 total units, 14,313 of which are owner-occupied and 9,967 of which are renter-occupied.

SCAG considers 2.3 percent to be the minimum ideal vacancy rate for ownership housing and 5 percent to be the minimum ideal vacancy rate for rental housing. These rates are ideal because they allow for a healthy amount of market turnover and availability. According to the 2019 ACS estimates, the 2019 vacancy rate in Redlands was 3.4 percent for ownership housing, which is above the 2.3 percent vacancy rate considered by SCAG to be the minimum needed for a healthy market. The rental vacancy rate was 3.8 percent.

TABLE 2-27: CHARACTERISTICS OF REDLANDS TENURE

Type and Tenure	Number of Units, 2011	Percent of Units, 2011	Number of Units, 2019	Percent of Units, 2019
Single-Family Detached	16,863	64.2%	17,145	65.0%
Single-Family Attached	1,148	4.4%	1,321	5.0%
Duplex	520	2.0%	391	1.5%
3 to 4 Units	2,247	8.5%	2,010	7.6%
5+ Units	4,385	16.7%	4,565	17.6%
Mobile Homes	1,096	4.2%	806	3.1%
Other	26	0.1%	40	0.2%
Total Units	**26,285**	**100%**	**26,369**	**100.0%**
Owner-Occupied	14,875	56.6%	15026	61.2%
Renter-Occupied	9.382	35.7%	9516	38.8%

Source: 2007–2011 and 2014–2019 American Community Survey 5-year estimates.

An analysis of the 2010 US Census data shows that the majority of both owner- and renter- occupied units (81 and 67 percent respectively) were occupied by Whites (Table 2-27). Blacks rented 867 units but owned only 394. Native Americans rented more units than they owned, with 119 rented and 92 owned units. Asian/Pacific Islanders owned more units than they rented, but only accounted for 7 percent of all owners and 7 percent of all renters. Those who identified as “Some other race,” were more likely to rent (1,219 rented versus 970 owned units), and those of “Two or more races” were about as likely to own or to rent (344 versus 383 units).

Similarly, in the County, a higher percentage of Whites, Native Americans, and those of “Some other race,” and those of “Two or more races” owned than rented units, while a higher percentage of Blacks rented than owned. There were about 800 more Native American owner-occupied units than renter-occupied units. Asian/Pacific Islanders and Whites were both more than twice as likely to own versus rent.

TABLE 2-28: TENURE BY RACE IN 2010

Race	City	Percent	County	Percent
Owner-Occupied Units	**15,061**	**60.8%**	**383,573**	**62.7%**
White	12,189	80.9%	261,151	68.1%
Black	394	2.6%	25,036	6.5%
Native American	92	0.6%	3,785	1.0%
Asian/Pacific Islander	1,044	6.9%	27,119	7.1%
Some other race	28	0.2%	735	0.2%
Two or more races	970	6.4%	54,065	14.1%
Renter-Occupied Units	**9,703**	**39.2%**	**228,045**	**37.3%**
White	6,460	66.6%	121,986	53.5%
Black	867	8.9%	33,488	14.7%
Native American	119	1.2%	2,975	1.3%
Asian/Pacific Islander	610	6.3%	11,166	4.9%
Some other race	45	0.5%	919	0.4%
Two or more races	1,219	12.6%	47,685	20.9%

Source: 2010 US Census.

In many places, housing tenure varies substantially based on the age of the householder. In Redlands, the age group where renters outnumber owners the most is 15-24 (by 92.8%). The age group where owners outnumber renters the most is 65-74 (by 56.5%). Table 2-28 compares the number of owner-occupied and renter-occupied units in the City of Redlands and San Bernardino County. There were similar ownership and renter trends in the City and County, although a higher percentage of elderly people rent in Redlands (16%) than in the County (9%). Therefore, the demand for senior rental units in Redlands is likely to be higher than the County as a whole.

TABLE 2-29: TENURE BY AGE OF HOUSEHOLDER, 2011 AND 2019

Age	2011 City	Percent	2019 City	Percent	County	Percent
Owner-Occupied Units						
15 to 24	53	0.4%	21	0.1%	2,705	0.7%
25 to 34	1,246	8.4%	974	6.8%	34,919	9.0%
35 to 44	2,403	16.2%	2,190	15.3%	68,329	17.6%
45 to 54	3,876	26.1%	2,835	19.8%	80,178	20.7%
55 to 59	1,772	11.9%	1,472	10.3%	49,124	12.7%
60 to 64	1,711	11.5%	1,960	13.7%	45,778	11.8%
65 to 74	2,072	13.9%	2,768	19.3%	65,542	16.9%
75 to 84	1,742	11.7%	1,456	10.2%	31,909	8.2%
85+			637	4.5%	9,595	2.5%
Renter-Occupied Units						
15 to 24	753	8.0%	562	5.6%	13,715	5.3%
25 to 34	2,896	30.9%	2,901	29.1%	70,035	27.3%
35 to 44	1,642	17.5%	2,203	22.1%	56,721	22.1%
45 to 54	1,585	16.9%	1,396	14.0%	46,379	18.1%
55 to 59	640	6.8%	609	6.1%	19,255	7.5%
60 to 64	395	4.2%	612	6.1%	16,144	6.3%
65 to 74	727	7.7%	772	7.7%	22,640	8.8%
75 to 84	744	7.9%	550	5.5%	8,410	3.3%
85+			364	3.7%	3,380	1.3%

Source: 2014-2019 American Community Survey 5-year estimates.

2.5.5 Vacant Units

In 2000, Redlands had a total of 24,878 housing units, 1,209 (4.9%) of which were vacant. About half (562) of these were for rent, while less than a third (324) were for sale. The balance consisted of units that were rented or sold but not occupied (94), for seasonal recreational, or occasional use (88), or vacant for some other reason (141). The Census reported that Redlands had no vacant units available specifically for migrant workers.

TABLE 2-30: VACANCY STATUS, 2011 AND 2019

Vacant Units	*2011*	*2019*
For rent	916	399
For sale only	403	249
Rented or sold, not occupied	208	305
For seasonal, recreational, or occasional use	163	222
For migrant workers	0	86
Other vacant	338	0

Source: 2007-2011and 2014-2019 American Community Survey 5 year estimates.

In 2011, Redlands had a total of 26,285 housing units, 2,028 (7.7%) of which were vacant. The homeownership vacancy rate was 2.6 percent and the rental vacancy rate was 8.8 percent. About half (916) of these were for rent, while about one-fifth (403) were for sale. The balance consisted of units that were rented or sold but not occupied (208), for seasonal recreational, or occasional use (163), or vacant for some other reason (338).

By 2019, Redlands had a total of 26,369 housing units, 1,827 (7.4%) of which were vacant. The homeownership vacancy rate was 2.0 percent and the rental vacancy rate was 3.9 percent. The balance consisted of units that were rented or sold but not occupied (305), or seasonal recreational, or occasional use (222), or vacant for migrant workers (86).

2.5.6 Age of Housing Stock

According to the 2019 ACS, approximately 42 percent of the housing stock in Redlands was built before 1970, and 34 percent was built before 1980. The ACS estimates that 3,678 homes in Redlands were built before 1950 (14% of the total).

TABLE 2-31: AGE OF HOUSING UNITS

Year Unit Built	Number of Units	Percent of Total Units
Built 2014 or later	222	0.8%
Built 2010 to 2013	206	0.8%
Built 2000 to 2009	1,773	6.7%
Built 1990 to 1999	1,506	5.7%
Built 1980 to 1989	5,306	20.1%
Built 1970 to 1979	6,218	23.6%
Built 1960 to 1969	3,510	13.3%
Built 1950 to 1959	3,950	15.0%
Built 1940 to 1949	1,155	4.4%
Built before 1939	2,523	9.6%
Total	**26,369**	**100.0%**

Source: 2014–2019 American Community Survey.

2.5.7 Condition of Housing

An overwhelming majority of homes in Redlands are fairly new and do not lack critical features such as plumbing. However, basic maintenance, such as roof repair, new paint, and cleanliness, will need to be continuously encouraged, particularly as a substantial portion of housing units are older than 30 years. Deferred maintenance such as old paint, roof sheathing that has outlasted its useful life, localized wood rot, and similar concerns do not typically result in units being boarded up, although such conditions do contribute to neighborhood deterioration.

2.5.7.1 Features

Adequate utilities within a housing unit are another measure of a housing unit's ability to provide people with decent housing. According to the 2019 ACS estimates, of the 24,542 occupied housing units in the City of Redlands, 45 units lacked complete plumbing facilities. The Census Bureau defines complete plumbing facilities as including (1) hot and cold piped water, (2) a flush toilet, and (3) a bathtub or shower. Furthermore, all three facilities must be located inside the dwelling unit. Heating fuel for occupied housing units ranged from gas and electricity to wood and solar energy. Of the occupied housing units in the City, 18,500 had utility gas, 363 had tank gas, 5,018 had electricity, 40 used fuel oil or kerosene, 65 were fueled by wood, 70 used solar energy, and 424 units had no heating fuel.

As of 2019, almost all housing units in Redlands had complete kitchen and plumbing facilities, although at least 221 units lacked an adequate kitchen and 105 units had incomplete plumbing facilities. Because the overwhelming majority of housing units has complete plumbing and kitchen facilities, and are served by utilities, it is unlikely that housing conditions represent a problem that requires government action.

2.5.7.2 Rehabilitation Need

The percentage of units built before 1960 can be used to estimate the City's maximum rehabilitation need. According to the 2019 ACS, about 29 percent of housing units were built before 1960.

However, according to the City's Building and Safety Division, many of the older homes in Redlands are in better condition than would be predicted based on age alone, partly because of interest by owners in fixing up historic homes and the City's robust Historic Preservation policies. Many of the City's historic homes in the south area are protected to some extent by local historic districts which require staff and/or Historic and Scenic Preservation Commission approval for modifications to the exterior. The majority of repair work is needed in the north area, with a number of units in need of either light repair—such as painting, reroofing, and landscaping—or significant reconstruction. There are no historic preservation districts in North Redlands despite having a large number of homes greater than 50 years of age.

During the 4th Cycle, the City used Redevelopment funds to address blight in North Redlands. Since the dissolution of Redevelopment, the City has not been able to provide direct rehabilitation assistance during the 5th Cycle Housing Element planning period. It is documented in the City's permit record that 11 units required substantial rehabilitation and 5 units were unsafe for habitation. All of the 11 units were single-family dwellings.

2.6 ASSISTED HOUSING

Assisted housing projects in the City can alleviate the financial hardships low-income households may face. Assisted housing projects are those that offer financial aid or provide extra services for people in need of financial or basic living assistance. There are a variety of programs, each focusing on a specific need or with a specific goal to eliminate unmet housing needs in the community.

2.6.1 Public Housing

The Housing Authority of the County of San Bernardino (HACSB) operates 120 units of conventional public housing in Redlands. All conventional units are rented to households with an income of 80 percent or less than the median income for the Riverside-San Bernardino Standard Metropolitan Statistical Area.

2.6.2 Housing Choice Voucher Program

In addition to operating public housing, the Housing Authority administers the HUD Housing Choice Voucher Program. Formerly, the County operated both a voucher and certificate programs. However, the certificate program ended as of 1999. Under the Housing Choice Voucher Program, the Housing Authority makes subsidy payments to property owners on behalf of the family. The program uses a Payment Standard to determine the maximum amount of assistance that will be paid on behalf of the family. The family's portion will be a minimum of 30 percent of their adjusted gross monthly income up to a maximum of 40 percent if they choose. HACSB administers the Housing Services programs that include the Housing Choice Voucher and Five-Year Lease Assistance programs. Participants on these programs may choose the city/community in which they wish to reside within San Bernardino County. As of 2019, there were 561 units of housing as part of the voucher program in the City of Redlands.

As mentioned above, the Housing Choice Voucher Program pays the difference in rent between 30 (or 40) percent of a household's income and fair-market rent for the unit. Payment Standards effective October 1, 2020, for the voucher program are as follows:

- Studio: $840
- One bedroom: $930
- Two bedroom: $1,070
- Three bedroom: $1,475
- Four bedroom: $1,850
- Five bedroom: $2,130
- Six bedroom: $2,405

The above rents assume the owner pays utilities. If not, the rent ceiling could be reduced by $110 to over $200, depending on the size of the unit.

2.6.3 Other Programs

The City of Redlands has previously pursued several programs for constructing housing units affordable to low- and very low-income households. These include the granting of density bonuses and the issuing of Mortgage Revenue Bonds. Since 1981, 164 density bonus units have been built, with 86 affordable to very low-income households and the rest to low- and moderate-income households. Since the last Housing Element planning period, the City has approved 80 low-income housing units using a density bonus.

With the dissolution of California's Redevelopment Agency in 2012, the ability of the City to offer financial assistance has been curtailed.

2.7 AT-RISK HOUSING

Housing Element law requires that a jurisdiction provide an analysis of existing publicly assisted housing developments that are eligible to convert from low-income use to market-rate housing during the next ten years (October 15, 2021, through October 15, 2031) due to termination of subsidy contracts, mortgage prepayment, or expiration of deed restrictions. This analysis is required only for multi-family rental housing for lower-income households.

2.7.1 Conversion Risk

Assisted housing units are those that offer financial aid or provide extra services for people in need of financial or basic living assistance. Subsequent amendments have clarified the scope of the analysis to also include units developed pursuant to inclusionary housing and density bonus programs. In the preservation analysis, localities are required to provide an inventory of assisted, affordable units that are eligible to convert to market rate within 10 years. As part of the analysis, an estimation of the cost of

preserving versus replacing the units is to be included, as well as a discussion of programs designed to preserve affordable units.

The California Housing Partnership Corporation (CHPC) assists nonprofit and government housing agencies to create, acquire, and preserve housing affordable to lower income households. As shown in Table 2-31, CHPC lists 60 assisted units in Redlands at risk of conversion within the next 5 years, and another 219 units in more than 10 years. The 60 units at risk for conversion are the Citrus Arms Apartments at 151 Judson St. The current contract is set to expire on April 30, 2024. Program 1.4-1 (Preservation/At Risk Housing) commits the City to tracking and monitoring at-risk housing, notifying the property owner of requirements, and engaging the property owner in a renewal contract.

TABLE 2-32: HOUSING DEVELOPMENTS AT-RISK OF CONVERSION

Risk Level	Definition:	Low-income units in jurisdiction	Percent of county's low income units
Very High	At risk of converting to market rate within the next year	0	0%
High	At risk of converting to market rate in the next 1-5 years	60	22%
Moderate	At risk of converting to market rate in the next 5-10 years	0	0%
Low	At risk of converting to market rate in the next 10 or more years and/or are owned by a large/stable nonprofit, mission-driven developer.	219	78%
	Total:	**279**	**100%**

Source: California Housing Partnership, July 2020. Includes HUD, Low-Income Housing Tax Credit (LIHTC), USDA, and CalHFA projects, SCAG pre-certified data.

In order for the property owner to successfully opt out of the Housing Choice Voucher contract, the owner must satisfy certain procedural requirements. The owner must provide notice of expiring rental restrictions to affected public entities and tenants three years prior to the scheduled expiration date. A Notice of Intent (NOI) must be filed with HUD one year before the termination date that indicates the owner's intent to convert the units to market rate. Failure to file an NOI within the specified time frame, or follow the other procedures to opt out of the Housing Choice Voucher contract, results in an automatic contract rollover for five years.

Upon filing of an NOI, HUD may offer several incentives to property owners to remain in their contracts, including re-financing the property mortgage and establishing higher rents charged for the projects.

Pursuant to Section 65863.10 of the Government Code, the property owner of a Housing Choice Voucher contract must also provide six months advanced notification to each tenant household if the property owner intends to terminate the Housing Choice Voucher contract. The notice must indicate the anticipated date of conversion and the anticipated rent increase. The property owner is also required to serve notice to the City.

Fair market rents for the San Bernardino County area in fiscal year 2020 are provided in Table 2-32, below.

TABLE 2-33: FAIR MARKET RENTS FOR EXISTING HOUSING IN SAN BERNARDINO COUNTY

Studio	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
$875	$1,030	$1,289	$1,789	$2,216

Source: Federal Register, HUD, FY 2020.

The rental market is seeing high prices which may threaten to induce owners of affordable units to convert those units to market rate.

2.7.2 Preservation and Replacement Options

In Redlands, the cost of conserving assisted units is estimated to be significantly less than that required to replace the units through new construction. The difference between extremely/very low-income and market-rate rents requires the most subsidy; preserving low- and moderate-income units does not require as much subsidy. Since land prices and land availability are generally the limiting factors to development of low-income housing, it is estimated that subsidizing rents to preserve assisted housing is more feasible and economical than new construction. HACSB performs this work for jurisdictions throughout San Bernardino County, including Redlands. Both HACSB and the City are responsible for the preservation and replacement of assisted housing units.

To maintain the existing affordable housing stock, HACSB works to preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of units to nonprofit ownership; 2) provision of rental assistance to tenants using other funding sources; and 3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units.

2.7.2.1 Transfer of Ownership

Transferring ownership of an at-risk project to a nonprofit housing provider is generally one of the least costly ways to ensure that the at-risk units remain affordable for the long term. By transferring property ownership to a nonprofit organization, low-income restrictions can be secured, and the project would become potentially eligible for a greater range of governmental assistance.

2.7.2.2 Construction of Replacement Units

Currently, programs that fill this role are managed by HACSB. The construction of new low-income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e., square footage and number of bedrooms), location, land costs, and type of construction. Presently, the cost to develop new housing in western San Bernardino County rages from $118 to $176 per square foot depending on the type and quality of finishes.[1]

[1] https://home-builders.promatcher.com/cost/san-bernardino-ca-home-builders-costs-prices.aspx. Accessed 8/30/2021.

There are three methods of assisting low-income tenants living in at-risk units: 1) providing monthly rental subsidies in the private market, 2) acquiring and preserving the presently subsidized units, and 3) constructing comparable replacement units.

In addition to the federally financed assisted developments listed in Table 2-33, projects funded by the former Redlands Redevelopment Agency using the 20 percent housing set-aside are potentially "at risk" of conversion as well. In exchange for financial assistance, the former redevelopment agency entered into regulatory agreements with property owners to keep units affordable at specified levels until the agreements expired. Under the Redevelopment Dissolution Act, the former Redlands Redevelopment Agency's housing functions and most of its housing assets were transferred to a "successor housing agency," separate from the Redlands Successor Agency, including the transfer of all housing covenants. The housing successor for the City of Redlands is HACSB. Assets of the HACSB are not considered to be at-risk units. There are no additional projects funded by the Redlands Redevelopment Agency that are at risk of conversion to market-rate uses.

2.7.2.3 Qualified Entities

HCD keeps a current list of all of the qualified entities across the state. A "qualified entity" is a nonprofit or for-profit organization or individual that agrees to maintain the long-term affordability of housing projects. The qualified entities that HCD lists for San Bernardino County are in Table 2-33.

TABLE 2-34: QUALIFIED ENTITIES, SAN BERNARDINO COUNTY (2020)

Organization	City	Phone Number
Innovative Housing Opportunities, Inc.	Irvine	(949) 863-9740
Abbey Road Inc.	North Hills	(818) 332-8008
ROEM Development Corporation	Santa Clara	(408) 984-5600 x17
CSI Support & Development Services	Monrovia	(626) 599-8464
Coalition for Economic Survival	Los Angeles	(213) 252-4411
Keller & Company	San Diego	
Poker Flats LLC	Los Angeles	
Orange Housing Development Corporation	Orange	(714) 288-7600
Nexus for Affordable Housing	Orange	(714) 282-2520
The East Los Angeles Community Union (TELACU)	Los Angeles	(323) 838-8556
Southern California Presbyterian Homes	Glendale	(818) 247-0420
Housing Corporation of America	Laguna Beach	(323) 726-9672
Coachella Valley Housing Coalition	Indio	(760) 347-3157
BUILD Leadership Development Inc.	Newport Beach	(949) 720-7044
Century Housing Corporation	Culver City	(310) 642-2007
Neighborhood Housing Services of the Inland Empire, Inc.	San Bernardino	(909) 884-6891

Source: California Department of Housing and Community Development, 2020.

However, given the fact that the owners of all of the housing units listed in Table 2-31 intend to continue to renew their financing programs with HUD, there is no need for qualified entities to acquire these properties.

2.7.3 Financing and Subsidy Resources

The housing element must identify all federal, state, and local financing and subsidy programs that are available as preservation resources. These resources are:

- Low Income Housing Tax Credits (LIHTC)
- CalCHA bonds
- California Housing Finance Agency
- CalHome
- SB2 Permanent Local Housing Allocation
- HOME Investment Partnership Program
- Recycled Redevelopment Agency Funds

2.8 OPPORTUNITIES FOR ENERGY CONSERVATION

There are many opportunities for conserving energy in new and existing homes. Construction of energy-efficient buildings does not lower the purchase price of housing. However, housing with energy conservation features should result in reduced monthly occupancy costs as consumption of water and energy is decreased. Similarly, retrofitting existing structures with energy-conserving features can result in a reduction in utility costs. Examples of energy conservation opportunities include weatherization programs and home energy audits; installation of insulation; installation or retrofitting of more efficient appliances, and mechanical or solar energy systems; and building design and orientation that incorporates energy conservation considerations.

2.8.1 Building Design and Construction

Many modern design methods used to reduce residential energy consumption are based on proven techniques that have been known to humans since the earliest of days of collective settlement. These methods can be categorized in three ways:

1. Building design that keeps natural heat in during the winter and keeps natural heat out during the summer. Such design reduces air conditioning and heating demands. Proven building techniques in this category include:
    - Locating windows and openings in relation to the path of the sun to minimize solar gain in the summer and maximize solar gain in the winter;
    - Use of “thermal mass,” earthen materials such as stone, brick, concrete, and tiles that absorb heat during the day and release heat at night;
    - “Burying” part of the home in a hillside or berm to reduce solar exposure or to insulate the home against extremes of temperature;
    - Use of window coverings, insulation, and other materials to reduce heat exchange between the interior of a home and the exterior;
    - Locating openings and using ventilating devices to take advantage of natural air flow; and
    - Use of eaves and overhangs that block direct solar gain through window openings during the summer but allow solar gain during the winter.
2. Building orientation that uses natural forces to maintain a comfortable interior temperature. Examples include:
    - North-south orientation of the long axis of a dwelling;
    - Minimizing the southern and western exposure of exterior surfaces; and
    - Location of dwellings to take advantage of natural air circulation and evening breezes.
    - Use of landscaping features to moderate interior temperatures. Such techniques include:

- Use of deciduous shade trees and other plants to protect the home;
- Use of natural or artificial flowing water; and
- Use of trees and hedges as windbreaks.

In addition to natural techniques that have been used for millennia, a number of modern methods of energy conservation have been developed or advanced during the present century. These include:

- Use of solar energy to heat water;
- Use of solar panels, photovoltaic technology, and other devices to generate electricity;
- Window glazing to repel summer heat and trap winter warmth;
- Weather-stripping and other insulation to reduce heat gain and loss; and
- Use of energy-efficient home appliances.

2.8.2 State Building Code Standards

The California Energy Commission was created in 1974 by the Warren-Alquist State Energy Resources Conservation and Development Act (Public Resources Code 25000 et seq.). Among the requirements of the new law was a directive for the Commission to adopt energy conservation standards for new construction. The first residential energy conservation standards were developed in the late 1970s (Title 24, Part 6 of the California Code of Regulations) and have been periodically revised and refined since that time.

Residential site design and construction techniques that can reduce the amount of energy used for space cooling would significantly reduce overall energy demand. As discussed above, a number of traditional and modern techniques can decrease energy used for space cooling, including:

- The orientation of buildings and windows with respect to the path of the sun;
- Landscaping to shade and insulate buildings;
- Insulation in walls and ceilings;
- Thermal mass to absorb solar energy during the day and release it at night; and
- Window treatments to reduce solar gain during the day;
- Installation of radiant heat barriers under roofing materials and the selection of “cool roof” shingles;
- Use of low heat gain pavers/hardscape to reduce the heat island effect.

The City’s abundant sunshine provides an opportunity to use solar energy techniques to generate electricity, heat water, and provide space heating during colder months, as well. Natural space heating can be substantially increased through the proper location of windows and thermal mass.

2.8.3 Public Utility Programs

2.8.3.1 Electricity

Southern California Edison (SCE) is the electricity provider for much of Southern California, including Redlands. SCE offers a range of programs designed to assist residential consumers with energy conservation:

- The Home Energy Efficiency Rebates Program offers rebates on a first-come first-serve basis to residential customers for energy-efficient cooling systems, water heaters and pumps, as well as appliances.
- The Residential Energy Efficiency Loan Program helps renters or homeowners to obtain attractive financing terms for energy-efficient updates.
- Residential Solar Programs for single-family homes (DAC-SASH), Solar on Multifamily Affordable Housing and Multifamily Solar Housing (SOMAH & MASH).
- Edison SmartConnect is a smart metering system that facilitates energy efficiency by communicating directly with appliances and reducing the burden on the electric system as a whole during peak electricity usage.
- The Low Income Home Energy Assistance Program (LIHEAP) is a federally funded program aimed to assist low-income households that pay a high portion of their income to meet their energy needs. LIHEAP is funded by the US Department of Health and Human Services, Administration for Children and Families, Office of Community Services.
- COVID-19 Rent Relief helps income eligible households pay rent and utilities.

SCE also offers several programs with the potential to assist low-income residents with their electricity costs, including those that do so through energy conservation.

The Energy Management Assistance (EMA) Program helps income-qualified households conserve energy by covering the purchase and installation costs of energy-efficient appliances and equipment. To qualify, SCE customers must receive service through a residential electric meter and have an SCE service account, as well as meet income qualifications (Table 2-34).

TABLE 2-35: EMA INCOME QUALIFICATIONS

Maximum Household Income (Effective from June 1, 2021, to May 31, 2022)	
Number of Persons in Household	**Total Combined Annual Income**
1 - 2	Up to $34,840
3	Up to $43,920
4	Up to $53,000
5	Up to $62,080
6	Up to $71,160
7	Up to $80,240
8	Up to $89,320
Each additional person	$9,080
Upper Limit Calculation = 250% of Federal Poverty Guidelines	

Source: Southern California Edison, Energy Saving Program, 2021, https://www.sce.com/residential/assistance/energy-saving-program.

Assistance is available to both owners and renters, though renters must obtain their landlord's permission. Customers may only receive EMA services once every ten years.

The Multifamily Energy Efficiency Rebate (MEER) Program offers property owners and managers of existing multifamily properties incentives on a broad spectrum of energy efficiency improvements in lighting, HVAC, insulation, and window categories. While MEER is available to all multifamily developments—even those without especially high proportions of affordable housing—it would be particularly helpful to low-income people, who are more likely to live in multifamily rental housing.

2.8.3.2 Gas

The Southern California Gas Company provides gas for heating and cooking purposes to Redlands, and many other communities in the southern part of the state. The following are a list of energy efficiency programs offered by the utility:

- Home Energy Efficiency Rebate Program offers cash rebates on qualifying energy efficiency upgrades and improvements made on single family homes, condominiums, or attached residential units (maximum of four);
- Multifamily Energy Efficiency Rebate Program offers cash rebates for the installation of qualified energy-efficient products in apartment dwelling units and in the common areas of apartment and condominium complexes, and common areas of mobile home parks.

The Southern California Gas Company also offers the Direct Assistance Program, which provides no-cost weatherization services such as ceiling and pipe insulation and water heater blankets as well as furnace repair and replacement to qualified low-income customers. The income qualifications are the same as those listed previously to qualify for SCE's EMA Program.

2.8.3.3 Water

The City of Redlands Municipal Utilities & Engineering Department provides residents with water audits upon request to help assist in water conservation. At present, irrigation is allowed only on assigned irrigation days by address:

- Even Addresses: Monday, Thursday, Saturday only
- Odd Addresses: Tuesday, Friday, Sunday only
- All Addresses: No watering on Wednesdays

Additionally, watering is permitted between the hours of 12:00 p.m. and 8:00 p.m.

2.8.4 Citywide Strategies

On December 5, 2017 the City adopted its Climate Action Plan (CAP). The CAP is designed to reinforce the City's commitment to reducing greenhouse gas (GHG) emissions and demonstrate how the City will comply with state's GHG emission reduction standards. The CAP includes an inventory of the City's GHG emissions, forecasts of future GHG emissions, monitoring and report processes, and options for reducing GHG emissions beyond state requirements that could be adopted at a future date, if so needed or desired.

Redlands has endorsed the US Mayors Climate Protection Agreement, effectively establishing City policy to pursue environmental stewardship pertaining to a broad array of environmental programs and initiatives. The City has committed to exceed the target of reducing global warming pollution levels to seven percent below 1990 levels. The green policy initiatives that will be necessary to achieve this goal include land use policies that promote walkable communities, preserve open space, and reduce sprawl; amenities that promote alternative transportation such as public transit, bicycle use, etc.; use of alternative sources of energy and energy efficiency; sustainable building practices such as Leadership in Energy and Environmental Design (LEED) development; increased recycling rates; and the promotion of healthy urban forests and shade trees.

The City has implemented several other programs and actions to reduce energy use, increase efficiency and reduce waste:

- Electrical generation from landfill gas: The City installed a landfill gas (LFG) collection system and constructed a cogeneration facility for electricity generation from the LFG. This system currently generates approximately 700 KW to provide approximately 60-70 percent of the electrical demand of the Wastewater Reclamation Facility. The City temporarily discontinued use of the facility as a result of it failing a "smog test" and new AQMD regulations but has since come back online. The 2035 General Plan contains policies directed at the investment in new infrastructure and technology for the reuse of methane gas emissions from the landfill.
- Conversion of the solid waste fleet to liquefied natural gas/compressed natural gas (LNG/CNG) alternative fuel: The City has replaced all of its trucks with LNG/CNG vehicles.

- Expansion of City recycling programs: As a result of expanded programs, and implementation of best practices and technology, the California Street Landfill has an extended lifespan of 2053.
- Ride share: The City promotes ride sharing among its employees through the Ride Share Time Off program.
- LED streetlights: The Municipal Utilities and Engineering Department installed LED lights in all existing traffic signals in the City and has established specifications for requiring LED lights in all new traffic signals. This action resulted in a 90 percent reduction in energy usage per traffic signal with a 3.7-year payback for the cost of installation. The City has been converting non-traffic streetlights and requires that LED light be installed during right-of-way improvement projects.
- Conversion of park irrigation controllers to SMART Controllers: In addition to saving water through changes in the park irrigation control system, the City also has a program to provide irrigation timer scheduling assistance to residents and businesses.
- Adoption of a Water Efficient Landscape Ordinance: Chapter 15.54 of the Municipal Code addresses water-efficient landscape requirements throughout the City. This Chapter of the Code establishes a structure for planning, designing, installing, maintaining, and managing water-efficient landscapes in new construction and rehabilitated projects.

This Housing Element and the 2035 General Plan can support this City effort through promoting infill development; siting housing near transit, jobs, and services; requiring greenscaping; and encouraging the use of green building standards. The City has implemented policies to streamline the permit processing phase for LEED projects and the plan check process for residential rooftop solar. The 2035 General Plan contains a litany of policies and actions directed at sustainability in the Sustainable Community Chapter. Furthermore, through the future adoption of the proposed Transit Villages Specific Plan, the City is pursuing infill and transit-oriented development.

2.9 REGIONAL HOUSING NEEDS ASSESSMENT AND SPECIAL NEEDS

The housing element focuses on providing housing for extremely low-, very low-, and low-income households—a need that is often unmet by the housing market. All of these groups have a household income that is 80 percent or less of the countywide median. In many California communities, the market is not producing for-sale or rental units affordable to even moderate- income households. In Redlands, the match between income and housing cost has been closer for most households than in the coastal Los Angeles metropolitan area, but the dramatic rise in housing costs compared to incomes since the year 2000 has made the city less affordable.

This section of the housing element evaluates three types of housing need. First is a discussion of housing need by income, using the categories determined by SCAG and established in the Regional Housing Needs Allocation (RHNA). The second section analyzes the special needs of persons whose housing choices are limited by personal characteristics: seniors, large families, female- headed households, farmworkers, disabled persons, and families and persons in need of emergency shelter. The final section addresses the number of Redlands residents living in overcrowded conditions, a situation especially common to large, low-income renter-occupied households.

2.9.1 Current Housing Need

It is often difficult for lower income households to find affordable housing. Housing is considered affordable when a household spends 30 percent or less of its income on housing-related costs. Table 2-35 quantifies the housing need of extremely low-, low-, and moderate-income households in Redlands.

TABLE 2-36: HOUSING NEED BY INCOME LEVEL, 2017

	Total Renters	Total Owners	Total Households
Extremely Low	**1,910**	**785**	**2,695**
with any housing problems	1,375	520	1,895
Cost Burden >30%	1,335	510	1,845
Cost Burden >50%	1,185	440	1,625
Very Low	**1,440**	**745**	**2,185**
with any housing problems	1,260	560	1,820
Cost Burden >30%	1,255	555	1,810
Cost Burden >50%	895	390	1,285
Low	**1,615**	**1,135**	**2,750**
with any housing problems	1,340	540	1,880
Cost Burden >30%	1,265	480	1,745
Cost Burden >50%	285	225	510

Source: 2013-2017 HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2017.

Extremely low- and low-income households are disproportionately likely to have housing-related problems (72% and 88%, respectively) and spend 30 percent or more of their incomes on housing (70% and 87%, respectively). In fact, 62 percent of extremely low-income households spend 50 percent or more of their incomes on housing. Across the board, larger percentages of renters spend 30 percent or more of their incomes on housing. This may be because more households who own bought their homes when they were more affordable or because the rental market is comparatively tighter.

2.9.2 Regional Housing Need Allocation

California Government Code Section 65584 requires SCAG to identify existing housing needs and to project needs in each of the region's jurisdictions at eight-year intervals. The 2021 Regional Housing Needs Allocation (RHNA) covers the period of October 15, 2021 to October 15, 2029. The RHNA is designed to incorporate population growth and change, employment patterns and commuting, and housing market problems. Housing elements must include policies and programs to meet the needs of all city residents.

The 2021 RHNA defines “existing need” as the number of households with one or more federally defined housing problem. HCD characterizes existing need as: “The number of households overpaying for housing, living in overcrowded conditions, or with special housing needs, the number of housing units that need rehabilitation, and assisted affordable units at-risk of converting to market-rate.” "Future need" is the number of units that would have to be added to accommodate forecasted growth in number of households by the end of October 2021, as well as the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an "ideal" vacancy rate of two percent for ownership units and five percent for rental units.

Future need is divided into five income categories (extremely low, very low, low, moderate, and above moderate), as defined by state and federal law. Table 2-36 shows income categories for a family of four based on median income in San Bernardino County in 2021, as defined by HCD using federal guidelines. The SCAG allocations for Redlands in each category are shown for the 2006-2013, 2014-2021, and 2021-2029 RHNA projection periods.

The RHNA for Redlands estimates that 967 very low-income housing units are needed between 2021 and 2029. While the RHNA does not include a separate extremely low-income category, the City estimates that 50 percent (allowed per state methodology) of the projected housing need for very low-income households qualify as extremely low-income households. Therefore, the projected housing need for extremely low-income households during the 2021-2029 RHNA is estimated to be 483 units.

TABLE 2-37: REDLANDS REGIONAL HOUSING NEED ALLOCATION BY INCOME CATEGORY SCAG ALLOCATION, 2006-2013, 2014-2021, AND 2021-2029

Category	Percent of County Median[1]	2021 Household Income	Housing Need 2006-2013	Housing Need 2014-2021	Housing Need 2021-2029
Extremely Low-Income[2]	Less than 30%	Less than $26,500	341	289	483
			12%[3]	12%	14%
Very Low-Income[2]	30-50%	$26,500 - $39,500	341	290	484
			12%	12%	14%
Low-Income	50-80%	$39,500 - $63,200	469	396	615
			16%	16%	17%
Moderate-Income	80-120%	$63,200 - $93,000	539	453	652
			19%	19%	19%
Above Moderate Income	Over 120%	More than $93,000	1,155	1,001	1,282
			41%	41%	36%
Total Needed			**2,845**	**2,429**	**3,516**

Sources: California Department of Housing and Community Development; SCAG 2013.

1. The 2013 County median for a family of four was $62,600, as determined by HUD.
2. The very low-income housing need allocation provided by SCAG was 967 for the 2021-2029 RHNA. Projected housing need for extremely low-income households presumes that 50 percent of very low-income households qualify as extremely low-income households.
3. The percentages indicate percent of housing need that falls within the indicated income level.

HOUSING PRODUCTION UNDER THE PREVIOUS RHNA

The previous Housing Element addressed the RHNA that covered the years 2014 to 2021. As Table 2-37 shows, only 19 percent of the housing allocation was met. See Section 5.2, Non-Governmental Constraints, for further discussion. The majority of units produced were above moderate-income (446 units), followed by low-income (18 units), moderate-income (4 units), and very low-income (1 unit).

TABLE 2-38: HOUSING UNITS PRODUCED IN REDLANDS, 2014 - 2019

Income Category	Regional Housing Needs Allocation	Total Units Produced	Results vs. RHNA
Very Low Income	579	1	578
Low Income	396	18	378
Moderate Income	453	4	449
Above Moderate Income	1,001	446	555
Total	**2,429**	**469**	**1,960**

Source: City of Redlands, Development Services Department, 2019.

2.9.3 Special Housing Needs

For some types of households, limited income is not the only obstacle to finding satisfactory housing. Finding units of adequate size, location, and design can be especially difficult for the elderly, the disabled, large families, female-headed households, farmworkers, and the homeless. California Government Code Section 65583(a)(6) requires an analysis of the special housing needs of these groups. For people with special needs, a fundamental obstacle to determining unmet needs and providing assistance is establishing the number of special needs households. It should be noted that there is undoubtedly overlap among the numbers used in the discussion below. The US Census and other data enumerating special needs households usually do not specify, for example, the number of migrant families that are large families or the number of elderly or disabled persons who are homeless. Table 2-38 lists households with special needs as of 2019.

TABLE 2-39: REDLANDS HOUSEHOLDS WITH SPECIAL NEEDS, 1990-2019

Household Type	2010		2019	
	Number	Percent	Number	Percent
Elderly	5,443	22.0%	8,076	30.9%
Disabled	NA	NA	NA	NA
Large Families (5 or More Members)	2,662	11.0%	NA	NA
Overcrowded (>1.01 persons per room)	895	3.7%	830	4%
Female Head	1,715	6.9%	2,402	9.2%
Total Households	**24,764**	**100.0%**	**26,115**	**100.0%**

Sources: 2010 US Census; 2019 American Community Survey.

1. Large family households and overcrowded households reported by American Community Survey.

THE ELDERLY

Senior citizens are identified as a population in need of special housing because of physical constraints that require certain housing accommodations or modifications, and limited incomes that prevent many seniors from being able to afford the most suitable housing. Small units in proximity to services and transportation are desirable for many seniors. Other seniors who are able to live independently in their current homes can often benefit from financial assistance that helps them properly maintain their homes or make minor modifications for increased mobility. (Information on the number of seniors with disabilities is provided in the Special Needs section on persons with disabilities.)

According to the 2019 American Community Survey, the elderly population (those 65 and older) in Redlands represented 15.8 percent of the general population. Approximately 13.5 percent of all elderly households earned less than 30 percent of the surrounding area income.

In general, seniors are more likely to own rather than rent their homes—over three-quarters of seniors owned their homes in Redlands, according to the 2019 American Community Survey. Table 2-39 compares the tenure of senior households in the city and the county.

TABLE 2-40: ELDERLY HOUSEHOLDS BY TENURE, 2019

Age	City	Percent	County	Percent
Owner-Occupied Units				
Under 65	9,832	65.43%	278,089	73.13%
65 to 74	2,890	19.23%	62,585	16.46%
75 and over	2,304	15.33%	39,607	10.42%
Total Senior	5,194	34.57%	102,192	26.87%
Renter-Occupied Units				
Under 65	7,997	84.04%	224,922	87.94%
65 to 74	735	7.72%	18,901	7.39%
75 and over	784	8.24%	11,937	4.67%
Total Senior	1,519	15.96%	30,838	12.06%

Source: 2019 American Community Survey.

Seniors make up a higher percentage of households in Redlands than in the county overall. Therefore, in general, seniors make up a larger percentage of owner and renter occupied households in Redlands as compared to the county.

Table 2-40 shows the Redlands elderly population displayed by tenure and income level. Predictably, elderly households with the lowest incomes were more likely to rent than own their homes; this indicates a need for affordable rental units geared towards seniors.

TABLE 2-41: ELDERLY INCOME LEVEL AND TENURE, 2016

Income Level	Elderly[2] Renter-Occupied Households	Elderly Owner-Occupied Households	Total Elderly Households
Below 30% of AMI	**510**	**395**	**905**
	28%	8%	**36%**
31-50% of AMI	445	480	**925**
	25%	10%	**34%**
51-80% of AMI	300	555	**855**
	17%	11%	**28%**
80% - 100% of AMI	105	375	**480**
	6%	8%	**13%**
Above 100% of AMI[1]	455	3,065	**3520**
	25%	63%	**88%**
Total	**1,815**	**4,870**	**6,685**
	100%	**100%**	**100%**

Source: 2012-2016 CHAS Data, May 2013.

1. CHAS data does not distinguish between moderate and above moderate households.

2. "Elderly" is defined as age 62 or older.

Existing developments designed specifically for seniors include the 170-unit congregate care facility, Mission Commons, built in 1989. Other affordable housing projects that house seniors within Redlands are: Citrus Arms with 60 units; Redlands Village Green, a 105-unit non-assisted (yet affordable) senior housing facility; Casa de la Vista, a 75-unit Section 202-income senior housing project completed in 1990; and Redlands Senior Housing 2 (Fern Lodge), a 62-unit Section 202 senior apartment complex. Two 51-unit low-income senior projects in Yucaipa were built by the San Bernardino County Housing Authority to aid seniors in the Redlands area. Heritage Partners also recently completed a 53-patient senior citizen assisted-living facility and American Baptist Homes of the West constructed a 12-bed Alzheimer's facility.

The following are senior housing projects that have recently been proposed, approved, or constructed that should provide additional affordable housing for seniors:

- 340-unit and 30 cottage senior care facility/assisted living on the northeast corner of 5th and Wabash (under construction). The 30 cottages have been constructed and are occupied and two of the seven planned buildings for congregate care are complete. Additionally, a 44,000-square-foot congregate care facility with 42 units and a multiple purpose building that houses medical offices and social support facilities have also been constructed and are occupied.
- Vista del Sol, a 71-unit senior housing project on Webster Street at Lugonia Avenue (completed and 100 percent occupied).

To further assist in providing additional housing for senior citizens, the City enacted a Second Dwelling Unit ordinance in accordance with Government Code Section 65852.2, which was first adopted in 1982. This code section allows special housing for senior citizens in any single-family district subject to approval of a "use permit."

As indicated in the list above, several senior assisted housing units will be constructed in the next few years, which will help to accommodate the need for senior housing. Because Redlands has an older, more affluent population, it seems likely that many seniors are well-off, and some of those having low-incomes are "income poor" but "housing rich"; that is, they may be living on a low fixed monthly income but have a higher net worth in real estate. Nevertheless, there are a number of senior homeowners (the exact number cannot be determined from available data) who live in older homes in need of repair or accessibility modifications, but who do not have the income or assets necessary to make those needed repairs or modifications. The City provides low interest loans and grants to address this need based on the policy that seniors who are able to live independently in their own homes should be assisted in doing so.

Finally, many services that target seniors are available to Redlands residents (Table 2-41).

TABLE 2-42: ELDERLY SERVICE ORGANIZATIONS

Organization	Services(s) Provided	Phone Number
Joslyn Senior Center	Social, instructional, health and recreational services to Redlands residents age 50 and older; Computer lab; and Help groups.	(909) 798-7550
Meals-on-Wheels	Delivers meals to homes of seniors, and homebound, disabled, frail or at-risk populations.	(909) 792-0716
Redlands Senior Transportation Program	Wheelchair accessible van service available to residents who are 55 years of age and older or who are physically or mentally unable to utilize other forms of transportation.	(909) 798-7579 (Information) (909) 335-9660 (Reservations)
San Bernardino County Department of Aging and Adult Services	Adult Protective Services Program; Family Caregiver Support Program; In-Home Supportive Services; Linkage Programs; Long- Term Ombudsman Program; Multipurpose Senior Services Program; Nutrition Services; Senior Training and Employment Program; Senior Information and Assistance Hotline.	(909) 891-3900 (Department) (800) 510-2020 (Senior Information & Assistance)
San Bernardino County Food Bank	Distributes food at sites all over the county; in Redlands, the first Friday of the month at Church on the Hill and the last Friday of the month at Salvation Army	(909) 723-1580

Source: City of Redlands, Community Development Department, 2008.

THE DISABLED

Disability data also provides valuable context for assessing current and future need for accessible housing units. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate.

The US Census defines a "disability" as "a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business."

Of individuals with disabilities, 4,465 (43.8%) were seniors. Individuals with ambulatory or independent living difficulties represented the most common disabilities, as reported in Table 2-42.

For those of working age, disabilities can also restrict the type of work performed and income earned. In fact, according to the 2009-2011 ACS, 60 percent of individuals over 16 with a reported disability were not in the labor force; 36 percent were employed; and 4 percent were unemployed (i.e., looking for work).

TABLE 2-43: INDIVIDUALS WITH DISABILITIES IN REDLANDS

	Youth (Age 5-17)	Adults (Age 18-64)	Seniors (Age 65+)	Total
Individuals Reporting One or More Disabilities:	1,019	4,710	4,465	10,194
With hearing difficulty	80	857	1,740	2,677
With vision difficulty	0	459	74	533
With cognitive difficulty	1,019	2,754	1,625	5,398
With ambulatory difficulty	0	1,450	2,904	4,354
With self-care difficulty	0	777	777	1,554
With independent living difficulty	N/A	2,659	2,432	5,091

Source: 2019 American Community Survey.
Note: Columns do not sum to total individual row because individuals may report more than one disability.

The current definition of family is "an individual, or two (2) or more persons related by blood, marriage or adoption, or a group of not more than five (5) persons, excluding servants, who are not so related, living together as a single housekeeping unit in a dwelling unit" (Ord. 1000 § 6.20, 1955). This definition may pose a constraint to groups of more than five unrelated persons living together. To mitigate this constraint, Program 1.2-17 is included to amend the definition of family in the Municipal Code such that it will no longer pose a constraint.

DEVELOPMENTALLY DISABLED PERSONS

According to Section 4512 of the California Welfare and Institutions Code a "developmental disability" is a disability that originates before an individual reaches adulthood (18 years old), continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. This includes intellectual disabilities (characterized by significantly sub-average general intellectual functioning), cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to other intellectual disabilities or that require treatment (i.e., care and management) similar to

that required by individuals with intellectual disabilities; however, it does not include other handicapping conditions that are solely physical in nature.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. In Redlands, the most commonly occurring disability amongst seniors 65 and older was an ambulatory disability, experienced by 18.5 percent of Redlands' seniors

The California Department of Developmental Services (DDS) supports approximately 330,000 children and adults with developmental disabilities and 41,000 infants at risk of developmental delay or disability throughout the state. Services are provided through state-operated developmental centers and community facilities, as well as through contracts with 21 nonprofit agencies called regional centers. The Inland Regional Center located in San Bernardino is the largest regional center in California providing services to more than 25,000 individuals with developmental disabilities in San Bernardino and Riverside counties. The regional center is a private, nonprofit community agency that contracts with local business to offer a wide range of services to individuals with developmental disabilities and their families.

Table 2-43 below summarizes persons with development disabilities in Redlands. Persons with development disabilities represent less than 0.7 percent of the city's population.

TABLE 2-44: PERSONS WITH DEVELOPMENTAL DISABILITIES IN REDLANDS

By Residence	Home of Parent/Family/Guardian	**466**
	Independent/Supported Living	**56**
	Community Care Facility	**21**
	Intermediate Care Facility	**56**
	Foster/Family Home	**10**
	Other	**10**
By Age	0-17 Years	**619**
	18+ Years	**273**
	Total	**1,511**

Source: SCAG Precertified Housing Data, 2021.

There are a number of housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving the needs of this group. Incorporating 'barrier-free' design in all, new multi-family housing (as required by California and federal

Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

LARGE HOUSEHOLDS

Large households are characterized as a special needs group because they require a greater number of rooms per dwelling unit to avoid overcrowding. In addition, many large households are low-income and cannot afford dwelling units with three or more bedrooms without paying more than 30 percent of their income for housing expenses.

According to the 2014-2018 ACS, 11 percent of households had five or more persons (approximately 2,705 households). In total, about 11 percent of all households in Redlands had five or more persons in 2019. Thus, the vast majority of households over five were made up of related persons. In 2011, around 55 percent of large households in Redlands owned their own home. About 45 percent of large households are renters, primarily because they are lower-income and cannot afford to purchase a home.

The ACS also indicates that approximately 17 percent (2,479 units) of rental units had three or more bedrooms (Table 2-44). The SCAG Certified Housing Data indicates there were 1501 large renter households (with five or more people). While these could be family and non-family households, it is not relevant to address the needs of large households, as familial status is not included in the definition of a large household. Moreover, assuming that these households rent apartments with three or more bedrooms, large households in Redlands would inhabit approximately over half of the city's rental units with three or more bedrooms.

While the preceding information indicates that housing for large households does exist in Redlands, available affordable units may be difficult to find. For example, a low-income five-person household would be able to afford a housing expenditure of $1,448 per month. According to the survey of Craigslist listings, the median rent for a three-bedroom unit in Redlands was $2,275. Given that there are households in Redlands that have even lower incomes, many large households may have difficulty finding housing in the city. A steady increase in household size since 1990 may be correlated with an increase in large families and low-income large families in need of subsidized housing as well as the increasing trend of multi-generational living arrangements. Moreover, as a group, large households have a higher incidence of overcrowding because it is more difficult to secure affordable rental housing of adequate size to meet a large household's needs.

TABLE 2-45: UNITS WITH THREE OR MORE BEDROOMS BY TENURE

Number of Bedrooms	Owner-Occupied Units	Renter-Occupied Units	Total
Three bedrooms	6,374	1,509	7,883
Four bedrooms	6,369	252	6,621
Five or more bedrooms	1,124	155	1,279
Total 3+ bedrooms	13,867	1,916	15,783
Percent of Total	87.9	12.1	100

Source: 2019 American Community Survey.

EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely low-income households are those with incomes less than 30 percent of the AMI. In 2019, the AMI in San Bernardino County was $63,362, while the AMI in the City of Redlands was $74,839. An income under $26,000 is considered extremely low-income.

Extremely low-income households have disproportionate and unique housing needs when it comes to housing supply, cost, and size. An analysis of household characteristics examining trends and the availability of resources is shown in Table 2-45.

Table 2-46: Extremely Low-Income Households experiencing Cost Burden or Overcrowding by Tenure

	Cost-Burdened	Overcrowding
Owner-Occupied	91.1%	2.6%
Renter-Occupied	83.05	14.7%
All	85.3%	11%

Source: HUD CHAS Data 2014-2018.

FEMALE-HEADED HOUSEHOLDS

The 2000 Census shows 1,823 female-headed households with children under 18, about 23 percent of all households with children. By 2010, this number had slightly decreased to 1,715, making up 23 percent of all households with children. By 2018, this number again slightly decreased to 1,683, making up 20 percent of all households with children. The Housing Authority of San Bernardino County reports the vast majority of the Section 8 households in Redlands are headed by women.

A large share of female-headed households with children are economically disadvantaged. Table 2-46 identifies that a significant number of female-headed households (primarily single mothers) were below the poverty level in 2011. There were approximately 54 percent more impoverished female-headed households as married couple families below the poverty level, even though the number of married couples was much greater. Although the percentage of all Redlands households below the poverty level was fairly low, about 28 percent of female-headed households with children were below the poverty level. These households made up 13 percent of all female-headed households. These households have a need

for low- cost housing, suitable for children located near schools and childcare. Innovative shared living arrangements that might include congregate cooking and childcare facilities would also be suitable.

TABLE 2-47: HOUSEHOLDS BELOW POVERTY LEVEL, 2020

	Family/Householder	Percent of Total Households
Total households in poverty.	1,373	5.7%
Female householder, no husband present. With related children under 18 years.	477	3.0%

Source: 2019 American Community Survey.

THE HOMELESS

The SCAG defines the homeless as those "sleeping out" in makeshift shelters, in cars and under freeway overpasses, and those who are "at risk" of homelessness in that they are sharing housing on a temporary basis, are living in single-room occupancy hotels, or their Calworks or other general relief stipend has been canceled twice within one year because they had no forwarding address.

According to the 2020 San Bernardino County Homeless Count and Subpopulation Survey Report there were 3,125 persons who were counted as homeless in the county on Thursday, January 23, 2020. In Redlands a total of 186 homeless people were counted, the majority of which were unsheltered (141) persons. Of the unsheltered homeless population in Redlands, 55 percent were substance abusers, 32 percent were mentally ill, 8.4 percent were victims of domestic violence, 25 percent were persons released from jails or prison during the past 12 months, 62 percent were chronically homeless, 11 percent were youth under 18 years of age (unaccompanied by an adult), 50 percent were youth ages 18 to 24, and 8.4 percent were US veterans. In total, the Redlands homeless population makes up 3 percent of the county total.

TABLE 2-48: HUD 2020 CONTINUUM OF CARE SAN BERNARDINO COUNTY HOUSING INVENTORY COUNT

	Total Year Round Beds	Seasonal Beds	Overflow / Voucher
Emergency, Safe Haven and Transitional Housing	**693**	**79**	**0**
Emergency Shelter	483	79	0
Safe Haven	24	n/a	n/a
Transitional Housing	186	n/a	n/a
Permanent Housing	**3,704**	**n/a**	**n/a**
Permanent Supportive Housing*	1,603	n/a	n/a
Rapid Re-Housing	2,101	n/a	n/a
Grand Total	**4,397**	**79**	**0**

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report.

Nonprofit Services

Several nonprofit organizations in and near Redlands attempt to address/assist the homeless on a daily basis. The majority of these organizations tend to focus on the homeless family. These entities include the Redlands Family Service Association, the Frazee Shelters, Inland Temporary Homes, Option House, and the Salvation Army. In addition, the 2-1-1 referral line operated by the Inland Empire United Way services the city.

Family Service Association provides transitional housing for families via rental assistance and shelter vouchers. Additionally, through the Housing Advocacy Program, Family Service Association provides emergency support, case management, and education to families and individuals in Redlands.

The Blessing Center provides free food and clothing to over 900 families each week. One large food box, worth in excess of $75 of quality food products, is distributed to each family once a week. Client families can shop for free clothing, baby care and other items, which are also available during food distribution. The Blessing Center also provides client families with much needed medical and dental services by a team of doctors and nurses, dentists, and dental technicians. Services to homeless individuals and families include bagged lunches, clothing, hygiene items and other resources. Dinner for the Homeless is every last Wednesday of the month.

The Blessing Center's Resource Center serves to assist job seekers in pursuing potential employment opportunities through resume writing, filling out employment applications, interview coaching and even providing proper clothing for job interviews. Classes in job training, E.S.L, G.E.D, and S.A.T. tutorial are also offered. A dedicated team of coaches and mentors are available to help clients obtain basic requirements such as an identification card, social security cards, etc.

The Frazee Shelters are part of a larger organization—the Frazee Community Center. The Community Center provides a wide range of services to low-income and homeless persons in the San Bernardino area. Services include housing assistance, clothing, nutrition, as well as referral services. Frazee is a nonprofit corporation and receives funds from United Methodist Churches and other denominations as well as Arrowhead United Way, East Valley United Way, and the City and County of San Bernardino, City of Highland, City of Redlands. Frazee also receives grants and donations from individuals, corporations, and other organizations. Frazee operates three shelters— two veteran's shelters for men in San Bernardino and one women's shelter in Highland. In addition, Frazee offers a no-cost lunch to those in need during the weekdays.

Inland Temporary Homes operates a homeless shelter that provides housing to six families with a maximum stay of 90 days as well as transitional housing to 20 families (16 single family units and four attached units) with a maximum stay of two years. Inland Temporary Homes also provides various services including case management, career counseling, mental health counseling, and follow-up services for families that complete the shelter program but do not enter the transitional housing program.

Option House provides services to women and children who are victims of domestic violence. In addition to shelter services, Option House offers in-house classes, legal advisors, support groups, and treatment for a range of issues. The organization helps over 300 people in its shelter and over 200 with legal services.

The Salvation Army provides the homeless (families, individuals with children, and women) with daily meals, day care, and some monetary assistance. In addition, they assist families with counseling, motel vouchers, money for gasoline, prescriptions, utility bills, and toiletries. Currently, the San Bernardino location provides 48 families with transitional housing ranging from 30 days to three years as well as 14 emergency shelter units that are made available on a day-to-day basis. The Redlands location is a cold weather shelter that operates December 31 to March 31 and has capacity for 52 individuals and families.

Central City Lutheran Mission is a cold weather shelter that operates during the months of November through April. The shelter provides meals and bedding to 72 men each night.

In addition to these local organizations, the Community Action Partnership provides a number of programs and services aimed at low-income and homeless populations.

The Inland Empire United Way runs a hotline for San Bernardino and Riverside Counties. Those who are in danger of homelessness or already homeless can call 2-1-1 if they are in need of food, shelter, or assistance paying their rent and utilities. The 2-1-1 service also makes referrals for animal care, disaster resources, help for elderly veterans, clothing, disability programs, low-cost child and medical care, job training, and governmental programs.

Public Programs

The housing and social service needs of homeless persons are as varied as their reasons for being homeless. These include unemployment, eviction, physical or mental illness, and substance abuse. Many homeless persons need counseling, employment assistance, and shelter. Some need only temporary, transitional shelter. Others may need only short-term financial assistance such as a loan for the first month's rent and security deposit.

The City of Redlands currently has no public programs for serving the homeless. The City, however, is able to have some impact upon availability of housing via its General Plan and related policies. As the problem of homelessness continues to grow statewide, City policy makers may need to consider potential public programs to assist with the homeless. Emphasis is currently aimed at assisting those agencies already in the community through financial assistance from CDBG funds. Currently, the City has allocated CDBG funds to Inland Temporary Homes and the Family Service Association of Redlands.

FARMWORKERS

The City of Redlands is known for its citrus groves which bring employment to agricultural workers in the area. The 2010 US Census indicated there were 176 residents of Redlands employed in the agriculture, forestry, and fishing industry, and in 2019 this population was estimated to be 128 people. Of the City's 138 total jobs in the agriculture, forestry, fishing, and hunting industry, 55 may be considered full-time, year-round, non-seasonal positions. Agriculture, forestry, and fishing industry does not make up a large percentage of employment in the City; therefore, farmworker housing need can be met through general affordable housing programs.

The most recent data from the US Department of Agriculture's National Agriculture Statistics Service indicates that in San Bernardino County there are an estimated 2,246 people hired as farmworkers in the year 2017.[2] Of these, an estimated 546 were migrant workers.

Pursuant to Health and Safety Code 17021.5 and 17021.6, farmworker housing for fewer than six individuals should be treated as a single-family home and not require a discretionary approval. Agricultural employee housing with no more than 36 beds in a group quarters or 12 units designed for the use of a single household is permitted by right in agricultural land-use designations. Redlands' code does not currently allow farmworker housing within its agricultural districts. Program 1.2-18 is included to amend the code to allow for farmworker housing within all agricultural zones throughout the City in compliance with the Employee Housing Act.

STUDENTS

The University of Redlands, located north of Interstate 10, has approximately 4,931 students. About 65 percent of these (3,206) are undergraduates, the vast majority of whom live on campus. Undergraduates are only allowed to live off campus if they are married, their parents live in town, or if they have some other extenuating circumstance. The University has graduate programs in business and education, making up the remaining 35 percent (1,725) of the student body. Many of these students live in Redlands and seek rental units.

OVERCROWDING

The Census Bureau defines "overcrowding" as 1.01-1.50 persons per room and "extreme overcrowding" as 1.51 or more persons per room. Overcrowding typically results when either: 1) the costs of available housing with a sufficient number of bedrooms for larger families exceeds the ability to afford such housing, or 2) unrelated individuals (such as students or low-wage single adult workers) share dwelling units due to high housing costs. This can lead to overcrowded situations if the housing unit is not large enough to accommodate all of the people. In general, overcrowding—a measure of the ability of existing housing to adequately accommodate residents—can result in deterioration of the quality of life within a community.

Table 2-48 and Table 2-49 summarize the overcrowding status in the City. In 2000, 7 percent of the City's occupied housing units were overcrowded. In 2011, according to ACS estimates, this number had fallen to 4 percent, and in 2018 this number was remained approximately 4 percent.

In Redlands, 369 owner-occupied and 865 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. About 67 owner-occupied households and 277 renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding.

In 2000, according to Table 2-48, 4 percent of Redlands households were overcrowded and 3 percent were extremely overcrowded. By 2011, according to ACS estimates, 3 percent of households were

[2] US Department of Agriculture National Agriculture Statistics Service, San Bernardino County: https://quickstats.nass.usda.gov/results/5504D8CE-0FB5-35D3-A1A4-ECBEB702FCD2

overcrowded and less than 1 percent were extremely overcrowded. And by 2019, according to ACS estimates, 2 percent of households were overcrowded and another 2 percent were extremely overcrowded.

TABLE 2-49: OVERCROWDING: PERSONS PER ROOM

Persons	2000		2011		2018	
	Households	Percent	Households	Percent	Households	Percent
1.00 or less	22,000	93%	23,362	96%	25,088	97%
1.01 to 1.50	873	4%	693	3%	441	2%
1.51 or more	796	3%	202	1%	389	2%

Sources: 2000 US Census, 2011 and 2019 American Community Surveys.
Note: 2019 data is approximate.

TABLE 2-50: OVERCROWDED HOUSING BY TENURE

	San Bernardino County		Redlands	
	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied
Total:	386,204	252,443	16,172	9,745
0.50 or less occupants per room	238,685	107,481	12,508	5,573
0.51 to 1.00 occupants per room	125,456	107,301	3,486	3,523
1.01 to 1.50 occupants per room	15,721	27,239	0	429
1.51 to 2.00 occupants per room	5,197	8,737	178	220
2.01 or more occupants per room	1,145	1,685	0	0

Source: 2019 American Community Survey.

3 HOUSING RESOURCES & SITES INVENTORY

3.1 INTRODUCTION

The purpose of the adequate sites inventory and analysis is to identify specific sites suitable for residential development to allow for a comparison of the Regional Housing Needs Allocation (RHNA) with realistic development capacity. The RHNA is broken down by income group into four categories: very low (less than 50 percent of area median income [AMI]), low (50-80% of AMI), moderate (81-120% of AMI), and above moderate (over 120% of AMI). While a jurisdiction must show that it has adequate sites in total to meet its RHNA, it must also show that it can meet the allocation at each of these income categories.

3.2 REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)

A housing element must identify specific parcels of land that are available for residential development. HCD guidance also states that the inventory can include sites that are in the process of being made available for residential development, "provided the housing element includes a program that commits the local government to completing all necessary administrative and legislative actions early in the planning period." The RHNA projection period for this Housing Element is from October 2021 to October 2029.

SCAG adopted its RHNA in March 2021 for the 6th Cycle Housing Element. The housing allocation is not a production requirement but illustrates the goals for each community to accommodate through appropriate policies and land-use regulations. Allocations are intended to ensure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

The City of Redlands' share of the RHNA requirement for 2021-2029 is:

TABLE 3-1: RHNA ALLOCATION (2021-2029)

Very Low	Low	Moderate	Above Moderate	Total
967	615	652	1,282	3,516

3.2.1 Buffer

Recent changes to state law have required cities to continually maintain adequate capacity in their sites inventories to meet their RHNA. In the event that a site is developed below the density projected in the element, or at a different income than projected, or that a site is developed with a nonresidential project, the City must have adequate sites available to accommodate the remaining balance of the RHNA, or it must identify and rezone for new sites that can accommodate the remaining need. For these reasons the City is including an additional buffer of 20 percent above the RHNA in each category. Redlands is planning to accommodate a total of 4,218 new units through its sites inventory to provide an adequate buffer to avoid and minimize the risk of "no net loss."

TABLE 3-2: RHNA WITH BUFFER

	Very Low	Low	Moderate	Above Moderate	Total
RHNA	967	615	652	1,282	3,516
20% Buffer	193	123	130	256	703
Total with Buffer	1,160	738	782	1,538	4,219

3.3 CREDITS TOWARD THE RHNA

Housing units that are approved, under construction, or developed with building permits issued after June 30, 2020, can be credited toward the 6th Cycle RHNA.

3.3.1 Entitled Projects

Projects that were approved but had not been issued building permits prior to July 1, 2021, are included in the RHNA as credits. The list of approved projects by income level is included in Table 3-3. In total, the City has recently approved 791 units (711 above-moderate units and 80 low-income units), which are expected to be constructed during the 6th Cycle production period.

TABLE 3-3: APPROVED UNITS

Project Name	Description	Status	Number of Units	Income
Luxview Apartments	328 unit apartment complex on 21.8-acre site.	Approved by City Council in October 2019. Not yet built.	328	Above Moderate
Bouye Tract (TTM 20065)	29 single-family homes on 10.44 acres.	Approved by City Council in September 2019. Not yet built.	29	Above Moderate
Liberty Lane[1]	Approved low-income units. Developer stated intent to maintain affordability of units for low income veterans, particularly those needing assistance.	Approved in 2017. Not Yet Built.	80	Lower
Heritage Specific Plan	207 above moderate-income units.	Approved. Not yet built.	207	Above Moderate
Casa Loma Apartments	147 multi-family residential units on 5.7 acres.	Approved. Not yet built.	147	Above Moderate
Total	**791**			

Source: City of Redlands, Development Services Department.

The Liberty Lane Project is approved for 80 affordable units for low-income veterans. Multiple approvals, including the Conditional Use Permit, a Memorandum of Understanding between the Developer and US Veterans Initiative specify that the units are to remain affordable for lower-income veterans.

3.4 PENDING PROJECTS

In addition to projects that have already been approved, the City is currently processing entitlements for another 1,325 units. The City anticipates that these projects will be approved and constructed during the 6th Cycle planning period. The list of projects undergoing review is included in Table 3-4. These will be counted as above-moderate units.

TABLE 3-4: APPLICATIONS IN REVIEW

Project Name	Description	Status	Number of Total Units
Citrus Greens Specific Plan	20 units of age-restricted senior single-family housing on 5 acres in a gated community.	Application complete.	20
Bergamot Specific Plan	Subdivide the approximately 58 acres into 317 single-family residential lots. The project is divided into three neighborhoods: Neighborhood 1 is approximately 15 acres, has a minimum lot size of 7,200 square feet and contains 53 lots; Neighborhood 2 is approximately 12 acres, has a minimum lot size of 3,500 square feet and contains 144 lots; and Neighborhood 3 is approximately 19 acres, has a minimum lot size of 1,900 square feet and contains 120 lots.	Entitlement in process. Not yet approved.	317
Redlands Mall	Transit-oriented development with mixed uses (residential, retail, and office) on 11 acres in downtown Redlands.	Development proposed, undergoing entitlement review, not yet approved.	700
City Center Mixed Use	Mixed use project with residential, retail, and restaurant uses.	Development proposed, undergoing entitlement review, not yet approved.	138
The Grand Apartments	Multifamily residential project downtown near the train station.	Development proposed, undergoing entitlement review, not yet approved.	150
Total			**1,325**

3.4.1 Redlands Mall Redevelopment

The Redlands Mall site is located within the City's downtown core. It is ripe for redevelopment and is a prominent opportunity site for housing. It is approximately 11.15 acres in size and bounded by Redlands Boulevard (north), Orange Street (east), Citrus Avenue (south), and Eureka Street (west). The project proposal includes an adjacent 1.1-acre parcel at the southeast corner of Citrus Avenue and Eureka Street for the proposed relocation of CVS Pharmacy, which currently holds a long-term lease at the Mall site.

Presently, the Mall site is limited to 18 dwelling units per acre (du/ac) and a maximum building height of three stories. The policy regulating these standards, Measure U, provides certain exceptions, one of which is to exempt "development directly related to proposed Metrolink/ Arrow light rail stations in the City of Redlands, including one at the University of Redlands." The Mall site is approximately 650 feet south of the Santa Fe Depot train station at its closest point (with three routes of pedestrian access available along Third Street, Orange Street, and Eureka Street), and approximately 1,200 feet south of the Santa Fe Depot train station at its farthest point. The property at the southeast corner of Citrus Avenue and Eureka Street is approximately 1,300 feet south of the Santa Fe Depot train station at its farthest point, which is no more than one-quarter mile from the Metrolink/Arrow train platforms.

On May 18, 2021, the Redlands City Council adopted Resolution 8215 determining that a proposed mixed-use and transit-oriented development project for the Redlands Mall site and associated adjacent properties qualify for exemption from the Redlands General Plan provisions established by Measure U. This decision enables the City to consider project entitlements that would exceed the 18 du/ac and 3-story building height for high-density residential developments.

The development proposed for the Mall site includes the following components:

- Demolition of existing on-site buildings and improvements
- Multiple mixed-use buildings with an average of four stories, with actual heights ranging from three to five stories
- Up to 700 multi-family dwelling units (apartments and condominiums), to include live/work, studio, one-bedroom, two-bedroom, and three-bedroom units ranging between 475 and 1,500 square feet each
- A 6,000-square-foot recreational amenity building including pool
- 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
- Up to 12,000 square feet of office space on upper floors
- A pedestrian plaza totaling approximately 16,500 square feet on Third Street
- A parking structure with 780 spaces on four levels aboveground level (i.e., approximately four stories high with rooftop parking on fifth level)
- Two subterranean parking structures
- Public and private open space areas to include landscaping, shade trees, street trees, and pedestrian improvements
- Related site improvements to include sidewalks, driveways, landscape, lighting, flood prevention, and public and private utility connections

The proposal includes an extension of State Street westerly of Orange Street to reestablish its historical connection to Third Street. A new extension of Third Street (north-south) will reestablish a public street between Redlands Boulevard and Citrus Avenue. This will result in smaller blocks with shorter block lengths more amenable to pedestrian traffic (similar to the existing historical blocks along East State Street) and should also result in slowing motor vehicle traffic through the site.

The project will act as a catalyst for additional residential and mixed use development downtown and demonstrates the desire and feasibility of achieving higher densities around the three train station sites in Redlands consistent with the community's vision in the 2035 General Plan.

3.5 ACCESSORY DWELLING UNITS

State laws passed in 2017 and 2019 have legalized accessory dwelling units (ADUs) across California. Since these laws were passed, the City has seen increased interest and ADU construction. In 2017, the City issued two ADU permits, three in 2018, eleven in 2019, and fifteen in 2020. The significant growth in ADUs indicates that the City can reasonably expect increased ADU production above the 2020 rate through the duration of the cycle, especially since the COVID-19 pandemic essentially shut down most permitting and construction during the second quarter of 2020. However, for the purposes of the sites inventory, the City is utilizing an annual approval rate of 15 ADUs based on the most recent evidence in 2020. The most recent annual production rate of 15 ADUs indicates that approximately 120 ADUs will be constructed in the City over the 6th Cycle. While the City's average permitted ADUs from 2017 to 2020 was lower than 15, additional changes in state law in 2019 accelerated ADU production. The City experienced robust ADU permitting during 2021 at roughly 15 units. Production during 2020 and 2021 is most representative of the future production, given the similar regulations and growing homeowner interest.

To spur further production of ADUs, the City is including programs specifically designed to continue progress on ADU production. Programs 1.6-1 will create a comprehensive ADU education campaign, providing easy, how-to guides for homeowners interested in ADUs, and direct promotion of ADUs and City assistance to residents. Program 1.6-2 will develop preapproved ADU plan sets that residents will be able to use for free, reducing the cost and time necessary to obtain an ADU permit. Program 1.6-3 will update the ADU ordinance to match the most recent changes in state law. Most importantly, Program 1.6-4 includes a commitment to carefully track ADU production by income, and to implement additional strategies or revise the RHNA estimates if production does not meet the expectations presented below. The recent ADU production, resources, incentives, and contingency plan for lower production all demonstrate that the assumption of 15 ADUs per year is feasible and realistic for the 6th Cycle.

Importantly, the City will meet its RHNA for all income levels without ADUs—the ADUs credited towards the RHNA demonstrate realistic expectations based on recent trend data. Additionally, the City is committing to monitoring its ADU permitting throughout the cycle. If the trends indicate that ADU production is significantly less than anticipated and additional sites are needed, the City will adjust its RHNA strategy as necessary to ensure that adequate sites are available for all income levels throughout the planning period.

TABLE 3-5: RECENT ADU PRODUCTION

Year	2017	2018	2019	2020	2021*
ADUs Permitted	2	3	11	14	11

* As of June 1, 2021.

In December 2020, SCAG published a study estimating the affordability of ADUs in Southern California. Table 3-6 illustrates the total ADUs anticipated by income category over the 6th Cycle, based on the SCAG ADU affordability analysis for San Bernardino County and a production rate of 15 ADUs/year.

TABLE 3-6: PROJECTED ADUS BY AFFORDABILITY

Income Level	Extremely Low/Very Low	Low	Moderate	Above Moderate	Total
Percent of ADUs[1]	22.7%	34.8%	34.8%	7.7%	100%
Projected ADUs	27	42	42	9	120

Source: SCAG Regional Accessory Dwelling Unit Affordability Analysis. December 2020.

3.6 SITE CAPACITY ANALYSIS

3.6.1 Recent Developments and Project History

The City has experienced a variety of both single-family and multi-family residential projects in recent years. While many projects have been larger single-family tract homes developed through the City's Planned Residential Development program (codified in Title 18, Zoning Regulations, of the Redlands Municipal Code), several multi-family projects have also been constructed or proposed.

3.6.2 Multi-Family Trends

The City allows multi-family development in its R-2, R-3, C-3, C-4, A-P (Administrative & Professional Office), and T (Transitional) zones. R-2 and R-3 are exclusively residential zones; no commercial or industrial development is allowed. The remaining zones allow for full commercial/office, full residential (in A-P and T zones), or mixed residential and commercial uses. While the City did not experience significant production of mixed-use residential during the 5th Cycle, the anticipated Transit Villages Specific Plan will catalyze redevelopment adjacent to the new Metrolink/Arrow light rail stations and incentivize new housing development in downtown Redlands.

The City has recently approved/permitted six multi-family developments totaling 830 units, achieving a range of densities and affordability levels (Table 3-7).

TABLE 3-7: RECENT MULTI-FAMILY PROJECTS

Housing Type	Project Name & Affordability	Zoning	General Plan	Density	Acres (Gross)	Units	Yield %	Status
MFR	HACSB SP 61 Affordable Housing	SP61	MDR	15	19.2	228	79%	Built
MFR	Luxview Apartments Market Rate Housing	EV/2500RM	MDR	15	21.8	328	100%	Approved 2019
MFR	Villa Bonita Condominiums Market Rate Housing	EV 3000 RM	MDR	18	4.2	39	51%	Built
MFR	Brookside Apartments Market Rate Housing	A-P	Office	10	0.34	8	80%	Approved 2019
MFR	Liberty Lane Affordable Housing for veterans, individuals with special needs, and low-income families	R-2	MDR	15	4.72	80	113%	Approved 2017, pending financing
MFR	Casa Loma Apartments Market Rate Housing	Proposed R-3	Proposed HDR	Proposed 27	5.7	147	95.5%	Approved 2021
Average Yield							86.41 %	

Two projects affordable to lower-income residents are identified in Table 3-7. The Liberty Lane project was approved in 2017 but has yet to be constructed. Liberty Lane took advantage of a density bonus to achieve a yield of 113 percent of the maximum allowed by the underlying zoning. The Housing Authority of the County of San Bernardino constructed 228 units of housing affordable to lower-income households in "Housing Authority of the County of San Bernardino Specific Plan No. 61" and achieved a yield of 79 percent. Together, these affordable projects averaged a yield of 96 percent allowed by the zoning.

Overall, multi-family projects have average yields of 86.4 percent of the maximum allowed by the underlying zoning. While most of the recent multi-family developments have been at medium densities, the Casa Loma Apartments project, recently approved by City Council, has a higher yield at nearly 96

percent. Based on these recent trends, the City presumes a realistic yield of approximately 80 percent of the maximum for sites in multi-family residential zones for the 6th Cycle sites inventory.

3.6.3 Tract Maps and PRD Trends

Most recent residential growth in Redlands has occurred through the City's Planned Residential Development (PRD) permit process, which allows developers to achieve consolidated development in exchange for a comprehensive review and protection of natural and agricultural resources. PRD projects may achieve between 3-6.5 units per acre (depending on the underlying zoning designation) and are required to preserve between 20 to 40 percent (depending on the underlying zoning designation) of the gross acreage for agricultural land, recreational open space, and/or natural resources areas. A review of recent PRDs found that these sites achieved an average yield of 75.9 percent. Several of the developments exceeded 80 percent of the potential yield, and the City will implement a policy review and constraint reduction programs to ensure that each of these PRD sites are developed at 80 percent of the maximum density.

Based on this trend and future policies, it is anticipated that future PRD growth will generally match 80 percent of the maximum allowed by zoning.

TABLE 3-8: PRD DEVELOPMENTS IN R-E ZONE

Category	Project	Zoning	General Plan	Maximum Density (du/ac)	Acres (Gross)	Units	Yield %	Status
PRD	TTM 19975 (Diversified Pacific)	PRD R-E	VLDR	3	24.9	67	89.7%	Built
PRD	TTM 16465 (Judson Ranch - West)	PRD R-E	VLDR	3	30.4	61	66.9%	Built
PRD	TTM 16627 (Judson Ranch - East)	PRD R-E	VLDR	3	12.1	20	55.1%	Built
PRD	TTM 18882 (Patterson Ranch)	PRD R-E	VLDR	3	9	26	96.3%	Built
PRD	TTM 15937 (University Grove)	PRD R-E	VLDR	3	61.27	164	89.2%	Built
PRD	TTM 18979 (Diversified Pacific)	PRD R-E	VLDR	3	32.3	55	56.8%	Built
PRD	TM 20079	PRD R-E	VLDR	3	6.03	14	77.4%	Built
Average							**75.9 %**	

3.7 YIELD ASSUMPTIONS

TABLE 3-9: YIELD ASSUMPTIONS

Type	Assumed Yield
Residential	80%
Nonresidential/Mixed-Use	50%

3.7.1 Residential Zones

Pursuant to the analysis above, an estimated yield factor of 80 percent is assumed on residentially zoned land.

3.7.2 Mixed-Use Zones

The City allows residential development at 30 du/ac throughout its C-3, C-4, and A-P commercial zones (by reference to the R-3 density), as well as its Downtown Specific Plan (Specific Plan 45). Consequently, these zones can meet a substantial portion of the City's lower-income RHNA.

Much of the City's RHNA may be accommodated through mixed-use and nonresidential zones around the future Metrolink/Arrow light rail Stations, located near the Esri campus, Tri-City Center, downtown Redlands, and the University of Redlands. These mixed-use zones will allow for full residential development, a combination of residential and commercial, or full commercial development. While most incoming development is anticipated to be residential and mixed uses, it is possible that some sites will be developed for commercial uses, or otherwise below the maximum capacity. To account for this, the City is projecting yields in the mixed-use areas at 50 percent of the maximum allowed by the zoning.

3.8 DENSITIES AND AFFORDABILITY

Pursuant to state law, Redlands must plan for lower-income units on higher-density sites. Redlands is considered a Jurisdiction in a Metropolitan County and has a "default density" of 30 du/ac for lower-income sites. Therefore, all lower-income sites are located in zones that allow at least 30 du/ac.

To identify sites to accommodate the moderate-income capacity, the City used zones with densities between 12 du/ac and 30 du/ac. These zones support lower-intensity multi-family development, such as townhomes and garden apartments.

Above-moderate sites are located in zones that allow fewer than 12 du/ac. These zones typically support single-family developments.

TABLE 3-10: DENSITY AND AFFORDABILITY

Income Category	Density (du/ac)
Above-Moderate	0-11
Moderate	12-30
Lower	30+

3.9 SIZE

Pursuant to state law, sites that are used to accommodate lower-income housing must be between 0.5 and 10 acres. The City also considered adjacent parcels less than 0.5 acres in size with common ownership as eligible to accommodate lower-income units. While these individual parcels do not meet the size requirements, they collectively function as a single site and add up to over half an acre and would not require consolidation. Since the sites have common ownership, there would be no constraint or required

parcel assembly in order to achieve the size of half an acre, which is presumed to be a realistic size for lower-income sites pursuant to state law. Additionally, the City can meet its lower-income RHNA without these sites, but they are included due to their high potential and likelihood of redevelopment during the near future.

Overall, the City has 46 sites smaller than 0.5 acres that can accommodate lower-income units. There are generally three clusters: within the Tri-City Center, in downtown Redlands, and around the University of Redlands. All of the small sites are adjacent to other lower-income sites, and have combined areas of at least half an acre, indicating that they are suitable for lower-income housing development. Additionally, these sites only accommodate 117 total units, and the City has significant excess capacity for lower-income housing elsewhere. However, given the adjacency, common ownership, and locations of these sites adjacent to jobs, amenities, and public services, these small sites are ideal locations for lower-income housing development. The small individual sizes of the parcels will not preclude or prevent any development of lower-income housing production. Finally, the City is including Program 1.1-8 to provide incentives for small site consolidation and development.

3.10 SITES INVENTORY

To meet the RHNA, the City has identified land available for residential development under existing and future zoning. The City will rezone land to provide for up to 4,219 units (RHNA + 20% buffer) within three years from the date of adoption. The proposed inventory includes additional capacity beyond what is necessary to meet the RHNA + 20% buffer. Some of the rezone candidate sites identified in the RHNA may not be rezoned or will be zoned differently than illustrated in the sites inventory based on the results of additional public engagement and environmental review. Regardless of any final decisions on the specific sites to rezone, Redlands will have adequate capacity to meet the RHNA for all income levels after rezoning within three years of Housing Element adoption.

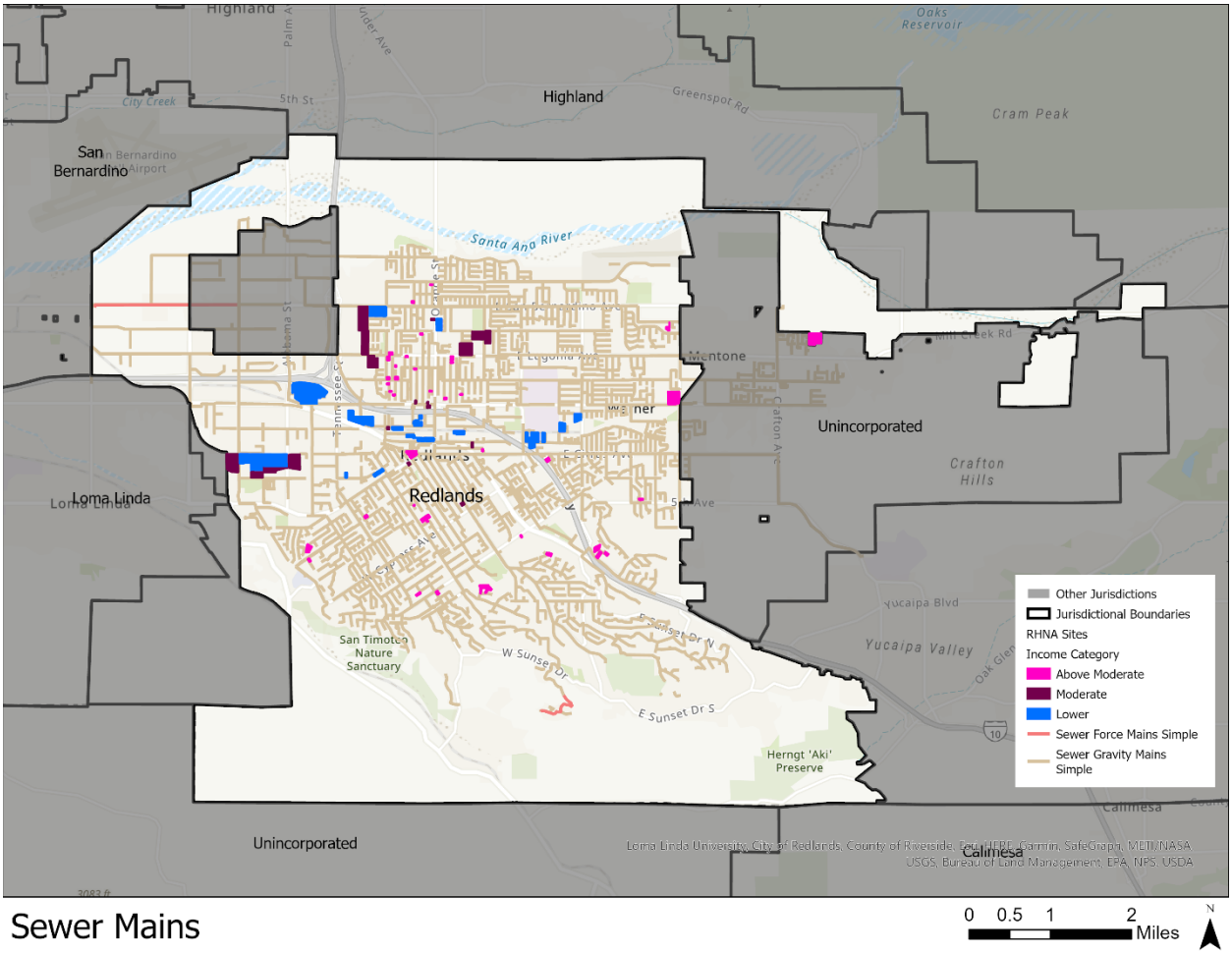
3.11 SITE IDENTIFICATION CRITERIA AND PRIORITIZATION

3.11.1 Infrastructure

The City prioritized identifying sites in areas served by existing infrastructure. The sites either already have infrastructure service or are located close to other properties with existing services. Some infrastructure expansion may be necessary to accommodate the large numbers of units in the areas of the East Valley Corridor (west side of Redlands) or Lugonia Avenue (north side of Redlands). In these instances, infrastructure such as water, sewer, and dry utilities run along major roadways adjacent to potential sites and are available to support new residential development. Recent projects across the City have demonstrated that minor infrastructure expansion is not a constraint to development, and the sites included in the inventory are appropriate for residential use. The only expansion necessary would be the extension of laterals to connect to the water and sewer mains, a standard and inexpensive component of nearly all housing construction. Due to the high quality and extensive coverage of the City's infrastructure, infrastructure is not expected to constrain housing development on any of the RHNA sites.

As seen in Figure 3-1, all of the RHNA sites have direct access to sewer infrastructure. The City's water lines generally run parallel to the sewer infrastructure, demonstrating that the sites have adequate access, and any investment needed in extending laterals will be limited.

FIGURE 3-1: RHNA SITES AND SEWER INFRASTRUCTURE



Sewer Mains

0 0.5 1 2 Miles

3.11.2 Access to Jobs

The City contains or is adjacent to several job clusters. For example, the Esri campus is located in central Redlands. Esri is one of the City's primary employers and provides well-paying jobs at different incomes. Another employment center is the University of Redlands, which has jobs for academic and support staff. Another employment area is the industrial/warehouse district in northwest Redlands and unincorporated County pocket. This area is home to a number of distribution facilities, along with more traditional industrial and corporate/office uses. Finally, portions of the western city are close to Loma Linda University Medical Center (in the City of Loma Linda to the west), which are also sources of high-quality jobs. When developing the sites inventory, proximity to these employment centers was considered and contributed to the selection of the identified sites. The sites proposed for high-density housing and

rezoning are all within close proximity to one or more of these employment centers, expanding access to opportunity for households at different income levels.

3.11.3 Environmental Constraints

The City has several environmental constraints that make certain areas challenging or less ideal for new housing development. In particular, high and very high fire hazard zones in the southern hills of the City create conditions that generally preclude these areas from significant new housing. The City's growth is anticipated to take place around the new Metrolink stations (not in a high/very high fire zone), so the fire risk will not act as a constraint to achieving the housing on RHNA sites.

The City also has open space designated areas with sensitive habitat in the southern hills. The City did not plan for any housing on areas with known sensitive habitat, so habitat impacts are not expected to constrain or limit the development of any RHNA sites.

Significant portions of the City's downtown are within a 100-year flood zone. The flood zone could impose a constraint in this area, but the City has seen several successful and proposed developments in and around downtown. Residential development is still allowed within the floodplain, provided that the residential spaces are located above the flood elevation. Achieving this typically involves minor grading and retaining walls to elevate finish floors 2 feet above the 100-year flood elevation, or by locating parking on the ground floor, as is typical in popular podium-style building typology (also known as Type 5 over Type 1 construction). A podium-style development is normally constructed with four or five wood-frame stories above a concrete podium (usually for retail or resident amenity space).

The downtown area will also be regulated by the TVSP, which will provide flexibility and other incentives for transit-oriented development, even within the floodplain. Moreover, the City has recently received three development proposals within the downtown Redlands floodplain area containing multi-family housing components totaling approximately 950 units. For these reasons, the floodplain is not currently acting as a constraint to residential development as the demand to develop within the floodplain area is strong, and is not expected to act as a constraint in the future. Sites located within the floodplain are both feasible and appropriate for residential development due to proximity to transit, high-quality retail, employment, services, cultural amenities, and educational opportunities. Additionally, Program 1.2-16 will further remove governmental constraints from developments in the floodplain, adding to the near-term viability of these sites.

3.12 RHNA SITE CLUSTERS

3.12.1 Transit Villages Specific Plan Area

The TVSP area is proposed to cover approximately 931 total acres in the City's historic downtown, around the Esri campus, and adjacent to the University of Redlands. The TVSP will facilitate smart growth around the City's three planned Metrolink/Arrow light rail stations by implementing a flexible, form-based code and allowing for high-density residential uses throughout the area. New developments will be able to achieve 30 du/ac in the proposed TVSP's Village Center and Village General districts (which allow up to three or four stories high), allowing eligible sites to be counted toward the lower-income capacity. The

form-based code will create regulations that make it feasible to develop at higher densities such as 30 du/ac, ensuring that the assumed yield percentages are highly conservative and realistic.

The plan is expected to facilitate the recycling of older and less profitable commercial/industrial uses to mixed uses including high-density housing. Despite the entire area allowing for high-density housing, the City is only including properties that are considered "likely to develop" in the sites inventory. The low-income sites in the TVSP area include vacant lots, underutilized commercial properties, older single-family homes, and parking lots. Overall, the TVSP is anticipated to contain capacity for 1,364 housing units in the sites inventory.

3.12.2 East Valley Corridor Specific Plan (EVCSP) Area

The City has identified candidate rezone sites in the East Valley Corridor area. Currently designated for commercial, agricultural, and industrial uses, the City will consider rezoning several of these properties to accommodate capacity for lower-income and moderate-income households. Many of the rezone candidate sites are vacant or are being used for agricultural purposes with no permanent structures on-site. A few properties have single-family homes on site, and others are used for industrial storage. The sites identified in East Valley Corridor area are adjacent to multiple schools and parks and have excellent access to regional job centers, including the Esri headquarters and Loma Linda University Medical Center. Additionally, these sites are accessible to the future Metrolink/Arrow light rail stations.

3.12.3 Tri-City Center Development

The Tri-City Center is located at 1380 Industrial Park Avenue and is bounded by I-10 to the north, Tennessee Street to the east, Colton Avenue to the south, and Alabama Street to the west. This 39-tenant shopping center consists of inline spaces and pad buildings with expansive parking areas over approximately 50 acres (over multiple individual properties). The Center, constructed in 1981, has experienced decline over the last two decades. In 2004, the Center was purchased by new ownership and plans were shared with the City in 2006 for a revitalizing program to reinvigorate the Center.[3] The economic recession stymied planned progress and the Center has remained underutilized. The development of the Citrus Plaza shopping center just north of the Tri-City Center within the unincorporated area known as the "doughnut hole" has drawn activity away from the Tri-City Center, with some tenants relocating to Citrus Plaza, or closing shop entirely.

There has been recent interest from developers to redevelop the Tri-City Center with a mixed-use residential/commercial concept. Based on the existing utilization of the Center and developer interest, the City has included 500 units from the Tri-City Center in the RHNA. This is substantially less than what would be allowed for the property under the draft TVSP. The Tri-City Center would be able to accommodate these units by redeveloping only a portion of the site; existing operating uses would likely be able to remain while vacant buildings or underutilized surface parking could accommodate new housing development.

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

Most parcels in the Tri-City Center are between 0.5 and 10 acres, meeting the statutory requirements for lower-income RHNA eligibility. Six parcels have acreages smaller than 0.5 acres, but these sites all have common ownership, and are adjacent to other properties that ensures the cumulative acreage is greater than 0.5 acres. As these sites have adjacent common ownership, true lot consolidation/acquisition is not necessary for redevelopment, and the smaller sites will not add any constraint or inhibit housing development for households at any income level.

3.12.4 Other Sites

The City has sites suitable for residential development elsewhere in the City. These consist of vacant lots that have existing zoning and infrastructure to support new housing development. Typically, these vacant lots are in single-family neighborhoods and can accommodate some of the above moderate-income RHNA.

3.13 NON-VACANT SITES ANALYSIS

State law presumes that non-vacant sites are subject to constraints based on the existing use, and findings are required to demonstrate the feasibility of non-vacant sites for housing.[4] This analysis may include a description of the existing use, market conditions, and previous redevelopment experience, as well as any new programs and incentives to promote reuse and redevelopment.

Importantly, if non-vacant sites are used to accommodate more than 50 percent of the lower-income RHNA, in addition to the detailed site-specific review, the City Council must adopt a resolution stating that existing uses on non-vacant sites are likely to be discontinued during the planning period.

Overall, the City can accommodate 1,760 units on vacant sites, including 682 lower-income units. Combined with recently entitled projects (80 units) and ADUs (69 units), the City can accommodate more than 50 percent (831 of 1,582) of its entire lower-income RHNA without relying on use of non-vacant sites. The City can fully accommodate its moderate- and above moderate-income units on vacant sites, ADUs, and approved/proposed projects. Therefore, the City is not subject to the required findings pursuant to AB 1397.

Despite the fact that the City can accommodate most of its RHNA on vacant sites, infill on non-vacant sites presents clear opportunities and capacity for additional residential development, particularly around the planned Metrolink/Arrow light rail stations. Overall, the City is anticipating over 1,961 units on non-vacant sites. Of these, 1,779 would be included as lower-income capacity due to the potential under the zoning.

Table 3-11 illustrates the distribution of the 3,721 identified units by the existing use and income.

[4] Government Code Sections 65583.2(b) and 65583.(g)

TABLE 3-11: IDENTIFIED SITES BY EXISTING USE

Income/Use Typology	Lower	Moderate	Above Moderate	Grand Total
Agriculture	550			550
Commercial and Services	549			549
Multi-Family Residential	7			7
Multi-Use Residential Agriculture		105		105
Parking Lot	31			31
Schools	28			28
Single Family Residential	614	77		691
Vacant	682	870	208	1,760
Grand Total	2,461	1,052	208	3,721

Most of the capacity on non-vacant sites is met through sites with existing single-family residential, commercial and services, and agriculture uses. Collectively, these sites can accommodate approximately 1,790 units of lower-income capacity. Other types, such as parking lots, multi-use residential agriculture, schools, and multi-family residential can accommodate 171 units.

3.13.1 Single-Family Residential

There are 16 sites (691 units) with existing single-family residential uses included in the inventory. These properties are all characterized by large lots (generally above 0.5 acres) with most of the property undeveloped. Some of these properties may also contain accessory uses, such as storage or agriculture. While some of the properties appear to be well utilized, a change in the zoning to allow high-density residential will make the existing uses significantly underutilized relative to the zoning potential. These sites have access to existing water, sewer, and dry utilities.

Lower Income Sites 20,21,22,23,24

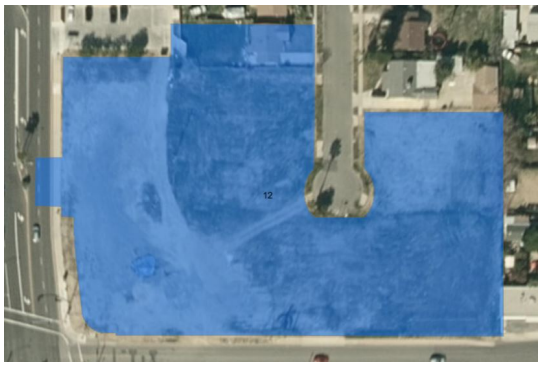
Lower Income Sites 20, 21, 22, 23, 24 are currently residential spaces each occupied by a single-family unit. The sites are located in the TVSP on Judson St and Stillman Ave. Each single-family unit takes up about 20 percent of the total site it occupies, leaving substantial room for increased density and residential development. These residential sites are adjacent to multi-family, single-family, and mobile-home residential uses. Additionally, these sites are close to the University of Redlands and planned Metrolink/Arrow light rail station. The sites are currently designated for High Density Residential in the General Plan at 30 du/ac. Three of the parcels are larger than 0.5 acres, indicating that they are suitable for lower-income development. The other two sites (23 and 24) have single ownership and have a cumulative acreage larger than 0.5 acres, also making them suitable for lower-income development. Given the residential location, transit accessibility, and high potential for increased development, these sites are likely to be developed for housing in the near term.

Lower Income Site 28

Lower Income Site 28 is a group of five parcels with common ownership at 337 Cook St in the TVSP that contains a single building but is majority vacant space, rendering it prime for further development. This residential site is directly adjacent to multi-family developments and the University of Redlands, which make it likely to be redeveloped over the 6th Cycle. The site is currently designated for High Density Residential in the City's general at 30 du/ac and will be included in the TVSP. The site is 1.6 acres and has a maximum capacity of 48 lower-income units, but a realistic capacity of 22 units. Given the residential location, transit accessibility, high potential for increased development, this site is likely to be developed for housing in the near term.

Lower Income Site 12

Lower Income Site 12 in downtown Redlands contains one single-family residence at 523 Ruiz St but is otherwise almost completely vacant. The site consists of 14 parcels (13 vacant) with common ownership, making the site eligible for low-income development. This site is currently zoned for commercial use but will be rezoned for multifamily residential at 30 du/ac as part of the TVSP. This site is adjacent to an existing residential area and another site designated for multifamily residential development in the upcoming cycle, which combined with the underutilization of the land makes it highly likely to be developed. The site is approximately 2.5 acres and has a maximum capacity of 77 lower-income units, with an assumed realistic capacity of 31 units.

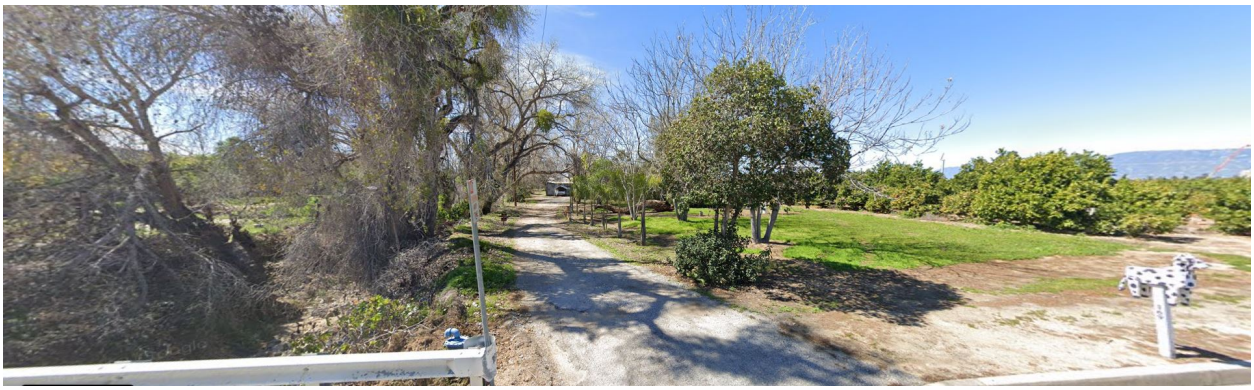


Moderate Income Site 21

Moderate Income Site 21 at 11030 Nevada St is majority occupied by a parking lot and industrial storage. The site is adjacent to a school and park, as well as a newer multifamily complex. It is also near an employment hub around the Loma Linda Medical Center. The site is currently single family residential but has more potential for utilization and will be rezoned to medium density. The site is 4.26 acres and has a realistic capacity of 50 moderate-income units. Given the location near employment hubs and underutilization this site is likely to be developed for housing in the near term.

Moderate Income Site 23

Moderate Income Site 23 at 169 Alabama St is currently occupied for single-family uses and is adjacent to an upcoming multifamily complex currently in construction directly to the south of the site. Most of the property is vacant/unused. The site is currently zoned industrial / commercial in the EVCSP but has significant residential potential and will be rezoned to medium density residential. The site is 2.3 acres and has a realistic capacity of 27 moderate-income units. Given the location near other multifamily developments and underutilization, this site is likely to be developed for housing in the near term.



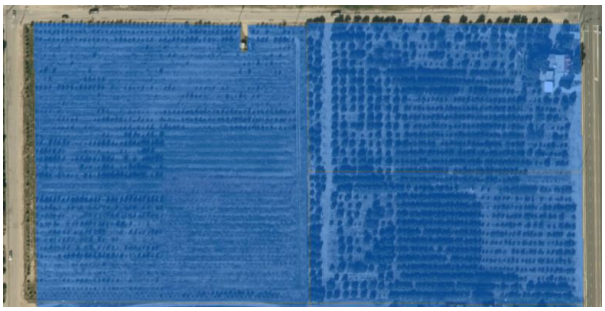
Above Moderate Income Site 25

Above Moderate Income Site 25 is at the corner of Wabash Ave and E Colton Ave and is currently completely vacant, rendering it prime for further development. This site is adjacent to a commercial strip and a large single-family residential neighborhood, in addition to a school and a park, making it likely to be developed in the 6th Cycle. The site is currently designated for Low Density Residential in the City's General Plan. The site is 9.01 acres and has a maximum capacity of 54 above moderate-income units, but a realistic capacity of 43 units. Given the residential location and high potential for development, this site is likely to be developed for housing in the near term.

3.13.2 Agriculture

Four sites solely used for agricultural purposes are included in the sites inventory. These sites have existing citrus groves, but generally lack significant structures. In recent years, the City has seen many examples of agricultural uses discontinued and converted to residential, largely due to changes in the agricultural economy locally as well as the cost and difficulty associated with maintaining active groves in the area. The agricultural sites in the inventory will be rezoned for high-density residential use, which will incentivize the conversion and development of housing. Additionally, the agricultural sites are located with close access to high-quality employment, schools, and the new Metrolink/Arrow light rail stations.

Lower Income Sites 41, 42, 44



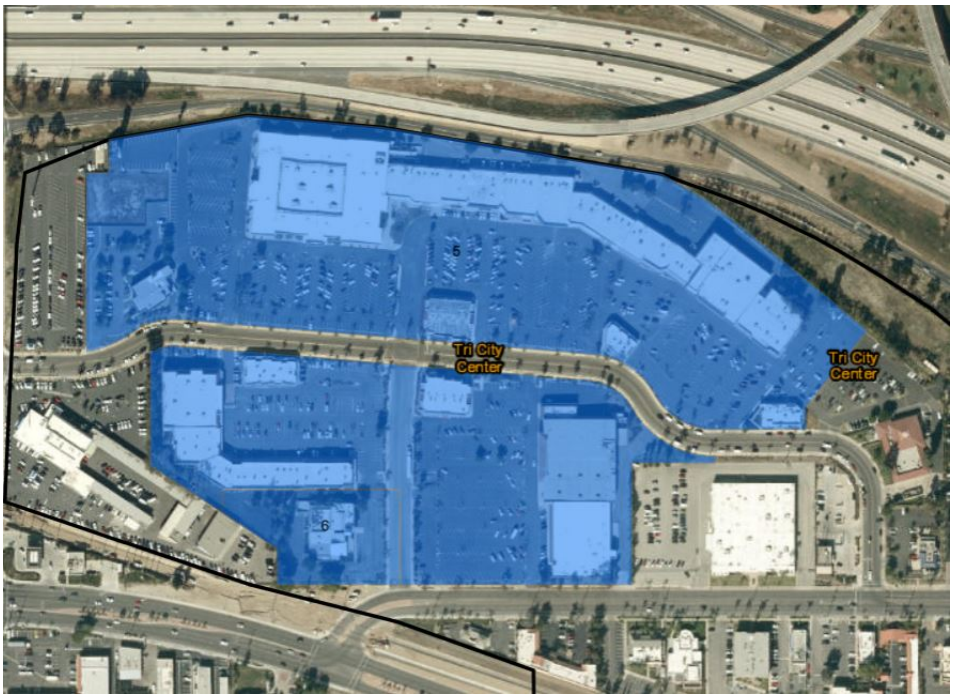
Sites 41, 42, and 44 are currently used for the Agricultural industry and are some of Redlands' many sites for growing citrus trees. Site 41 is currently residential with a single unit amidst existing agricultural use. Sites 42 and 44 are currently zoned for industrial use in the East Valley Specific Plan, but will be used as mixed-use high density residential at a density of 30 du/ac as a part of the housing element implementation. Once the properties are rezoned to allow for high density residential uses, they will provide 426 units of realistic lower-income capacity. Additionally, these sites have access to existing sewer, water, and dry utilities that extend adjacent to the sites on Citrus Avenue and Iowa Street.

3.13.3 Commercial and Services

Nearly all of the sites with existing commercial uses are within the Tri-City Center, which is described in Section 3.12.3, above and below as aggregated Sites 5 and 6. The Tri-City Center has had developers recently express interest in residential development, and could accommodate 500 lower-income units in the inventory.

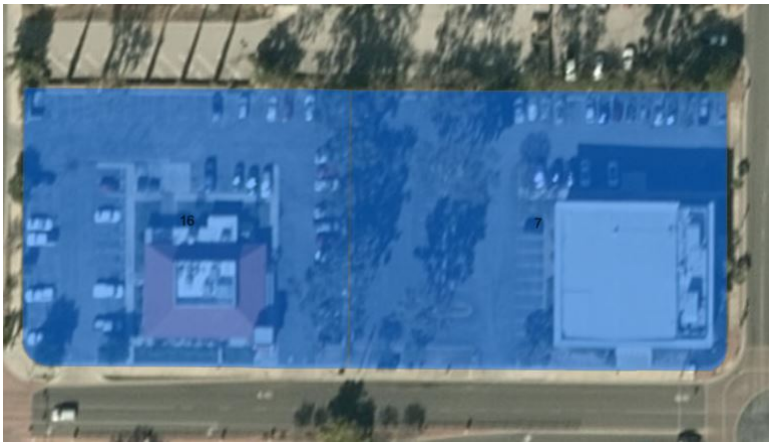
The other 50 commercial units are located in downtown along Redlands Boulevard on three adjacent parcels. One of the properties is owned by a residential developer who is waiting until the TVSP is adopted to propose a project. The other adjacent properties have a vacant restaurant building and vacant bank building. As there are no businesses currently operating on these properties, the existing uses will not act as constraints on development.

Lower Income Sites 5 and 6 (Tri- City Center)



Sites 5 and 6 are currently commercial spaces home to a shopping mall, an indoor playground, and a car dealership located at the Tri-City Center. This site is primarily occupied by surface parking lots, with less than half of the available land developed. It is central to a commercial area with storage facilities, restaurants, and shops, making this location for housing ideal for access to community serving amenities. The site is currently zoned commercial in the City's General Plan but will be rezoned to allow for mixed-use residential at 30 du/ac as a part of the TVSP. The included properties are approximately 33.5 cumulative acres and has a realistic capacity of 500 lower-income units. Given the central location, transit accessibility, and underutilized conditions, as well as stated developer interest, this site is likely to be developed for housing in the near term.

Lower Income Sites 7 and 16



Sites 7 and 16 are currently vacant commercial spaces that were previously occupied by a restaurant, bank, and real-estate firm. The site is in downtown Redlands, within the TVSP on Redlands Blvd and Orange St. These sites are each over 3/4 surface parking lot which could be converted or fully redeveloped into a high density residential use. It is central to a commercial area with libraries, restaurants, and shops, making this location for housing ideal for access to community serving amenities. The site itself currently allows residential at 30 du/ac in the City's General Plan and will be rezoned to higher intensity multi-family residential as a part of the TVSP. The sites are 1.85 acres combined and have a realistic capacity of 28 lower-income units. Given the central location, transit accessibility, and minimal existing development, this site is likely to be developed for housing in the near term.

Lower Income Site 15

Site 15 currently homes a commercial building at 120 W Redlands Blvd. The existing building takes up the large majority of the parcel with the exception of a small surface parking lot. It is central to a commercial area with restaurants and entertainment, making this location for housing ideal for access to community serving amenities. The site currently allows for residential at 30 du/ac, but will be rezoned to even higher density through the TVSP. The site is 1.47 acres and has a realistic capacity of 22 lower-income units. Given the central location, existing vacancy, and future transit accessibility, this site is likely to be developed for housing in the near term.

Lower Income Sites 7, 8, 9

Lower Income sites 7, 8, and 9 in the transit village contain one building on parcel 9 at 619 New York St but are otherwise vacant. This site is currently zoned for commercial use but will be rezoned for multifamily residential through the TVSP. These sites have immediate proximity to both downtown Redlands and the Esri campus, making them excellent candidates for future infill and transit oriented residential development. Additionally, these sites are directly adjacent to the new Esri Metrolink Station at New York Street. These sites combined are 5.78 acres and have a maximum capacity of 173 lower-income units, with a realistic capacity of 86 units.

Lower Income Site 13

Lower Income Site 13 in the transit village contains one building at 535 W Stuart Ave but is otherwise almost completely vacant. The site consists of 14 separate parcels, each smaller than 0.18 acres. The parcels have common ownership, so complicated lot acquisition or consolidation processes would not be necessary to construct a project on the site. The site has a cumulative area of 2.07 acres, making it eligible to be included as a lower-income site. This site is currently zoned for commercial use but will be rezoned for multifamily residential at 30 du/ac as through the TVSP. This site is central to a commercial area with grocery stores, restaurants, and religious facilities, making this location for housing ideal for access to community serving amenities. The has a maximum capacity of 62 lower-income units, and a realistic capacity of 31 units. The underutilized nature of the existing use, along with excellent location, makes this site likely for residential development in the near term.

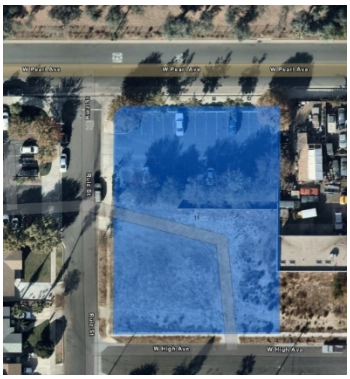
3.13.4 Parking Lots

The inventory contains five parcels completely occupied by parking lots, which are expected to have capacity for 31 lower-income units. Of these, two are a part of the Tri-City Center. Another parking lot provided overflow parking for a movie theater, which has currently ceased operations, but may eventually resume use. The third lot consists of two parcels that provide overflow parking for a small commercial development on Ruiz Street. These parcels will all be upzoned with the transit villages, making residential development more attractive and feasible within the near future. Additionally, the lots included act as surplus/overflow, and are not the only parking options for the centers.

Lower Income Site 14

Lower Income Site 14 in the transit village is currently a 1.56-acre gated, unused parking lot. The site is currently zoned for commercial/industrial use but will be rezoned to allow high density multifamily residential through the TVSP. This site is central to the downtown Redlands commercial core, with excellent access to restaurants, medical facilities, and planned transit. Based on the existing vacancy, new capacity through the TVSP, and proximity to community resources, this site is anticipated to be redeveloped during the 6th Cycle.

Lower Income Site 11



Lower Income Site 11 consists of four parcels. The two northern parcels are developed with a small, underutilized parking lot, and the southern parcels are vacant. The four lots are contiguous and have common ownership, and collectively add up to 0.61 acres, making them eligible for the lower-income RHNA. The site is located in downtown Redlands, with excellent access to commercial amenities, employment opportunities, and the downtown Metrolink/Arrow light rail stations. The property will be upzoned to allow for transit oriented development and multi-family residential through the TVSP. The site has a realistic capacity of 9 lower-income units and is likely to be redeveloped during the 6th Cycle.

3.13.5 Multi-Use Residential Agriculture

The City has one property considered "Multi-Use Residential Agriculture" which is anticipated to accommodate 105 units of moderate-income housing. The property is currently occupied by an existing citrus grove, single-family unit, and accessory agricultural storage. Based on the limited nature of existing improvements and high potential under proposed zoning, the existing uses are likely to be discontinued in favor of residential redevelopment.

Site 40

Site 40 is an existing Mixed-Use residential and agricultural site at Citrus Ave and Iowa St. which is majority agricultural land with a single-family residence built in 1906. The site is currently zoned for commercial industry but will be rezoned for high density residential for the Housing Element Implementation. Given the proximity to existing residential development and schools, and underutilization of the land, this site is likely to be developed for housing in the near term. The site is not encumbered by an Agricultural Preserve or Williamson Act Contract. This site is directly served by existing wet and dry infrastructure services.

3.13.6 School

The sites inventory includes one school. It is an existing preschool, with a single small structure covering less than 10 percent of the site. Half of the property is vacant, and the balance has a lightly used surface parking lot. The property is close to the Esri campus and proposed Metrolink/Arrow light rail stations and is significantly underutilized. Based on the current conditions on the site and proposed zoning, the property is likely to be redeveloped during the 6th Cycle.

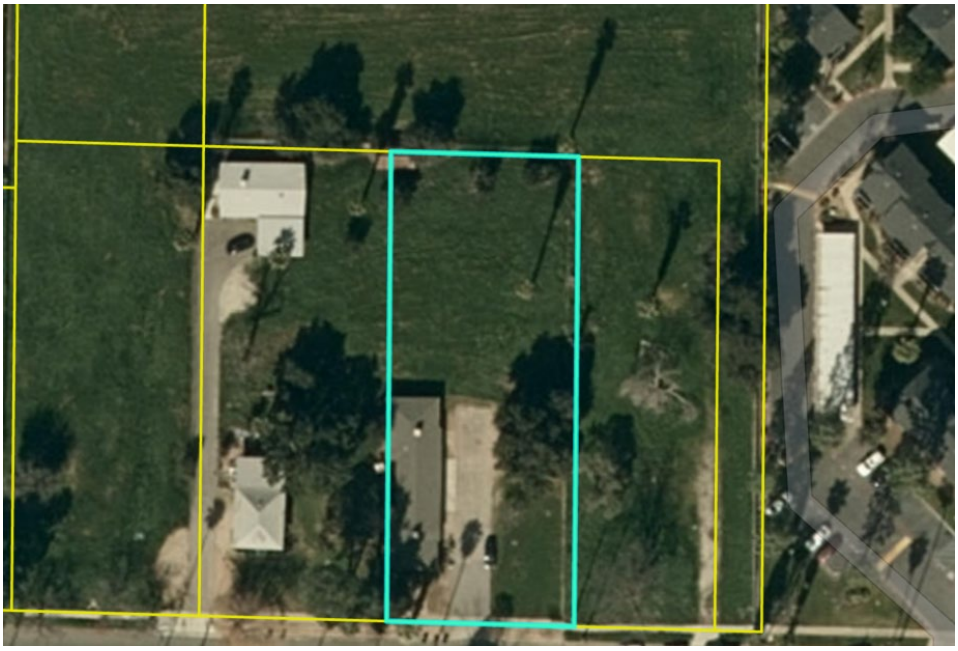
Lower Income Site 49

Lower Income Site 49 is currently a preschool with a large surface parking lot and unused vacant space located at 15 N Center St. The site is currently designated high density residential in the City's and will be included in the TVSP. The site is 1.88 acres and has a maximum capacity of 56 lower-income units, but a realistic capacity of only 28 units, which is highly conservative based on existing utilization and site condition. Given the location and minimal existing development, this site is likely to be developed for housing in the near term. This site is fully served by existing wet and dry infrastructure services.

3.13.7 Multi-Family Residential

Lower Income Site 33

The City generally avoided including any type of multi-family residential in its sites inventory; however, it did include a single duplex with significant residential potential under the TVSP. The property is mostly undeveloped, with two units occupying approximately 20 percent of the site. It is anticipated that the site could accommodate seven additional units, which could likely be constructed without requiring any demolition of the existing building. Based on these considerations, the property is likely to add units during the 6th Cycle. Additionally, this property is adjacent to other vacant properties under the same ownership, making it a strong candidate for lot consolidation and redevelopment. The property is 0.57 acres, making it eligible to be counted towards the lower-income RHNA. This site is directly served by existing wet and dry utilities.



3.14 ADEQUATE SITES

The City will have adequate capacity to meet its RHNA after rezoning, as shown in Table 3-12, which summarizes residential development potential for ADUs, pending projects, approved projects, and site capacity. The City has identified capacity for up to 2,610 lower-income units, most of which are included in the sites inventory (not including ADUs, entitled or pending projects). The City can accommodate 1,094 moderate-income units, which are also mostly met on sites in the inventory. The above moderate RHNA can be fully accommodated by recently entitled and pending projects, though the City identified additional eligible vacant sites to provide additional capacity and buffer if necessary.

TABLE 3-12: ADEQUATE SITES

Income/Category	Lower	Moderate	Above	Total
RHNA (+20% Buffer)	1,898	782	1,538	4,218
Identified Sites	2,461	1,052	208	3,721
ADUs	69	42	9	120
Recently Entitled Projects	80		711	791
Pending Projects			1,325	1,325
Total Identified Capacity	**2,610**	**1,094**	**2,253**	**5,957**
Surplus	712	312	715	1,738

3.15 LOWER INCOME SHORTFALL

Under existing zoning, the sites currently accommodating lower-income development have a yield of approximately 155 units, creating a lower-income shortfall of 1,427 units. Sites that will be rezoned to accommodate the lower-income shortfall will be subject to by-right approval for projects with 20 percent or more housing for low and very low income households and will have minimum densities of 20 du/ac and allow a minimum of 16 units per site pursuant to GC 65583.2(h).

To accommodate the shortfall, the City is relying both on mixed-use sites within the TVSP, as well as rezoning outside of the TVSP area. The City will upzone to provide for additional capacity for 1,376 units in the R-3 (residential only) zone. These 1,376 units account for more than 96 percent of the lower-income shortfall. Because more than 50 percent of the lower-income shortfall is met through residential (not mixed-use) zoning, the City is not required to establish minimum residential floor areas in the TVSP pursuant to GC 65583.2(h).

A list and map of all sites included in the inventory is included in Appendices A and B.

3.16 FINANCING AND OTHER SUBSIDIES

The City, the County, and HACSB all provide funding and subsidies for the construction, acquisition, and rehabilitation of housing units for lower-income households in Redlands. Many of these programs capture funding from the state and the federal governments and administer the money for local tenants, owners, and developers of affordable housing.

3.16.1 City of Redlands

3.16.1.1 Mobile-home Rent Stabilization

Mobile home parks built prior to October 1, 1981, are subject to rent stabilization, according to City Municipal Code Chapter 5.48. This policy covers three mobile home parks: Sylvan Mobile Estates, Orange Grove Mobile Estates, and Lugonia Fountains. Taken together, 500 housing units are covered.

Other mobile home parks in the City that are not covered by the Rent Stabilization policy are:

- Royal Trailer Park – 1409 W Redlands Blvd.
- Redlands Ranch – 1721 E Colton Ave.

3.16.1.2 Community Development Block Grant Programs

The City of Redlands is a Participating Jurisdiction in the County of San Bernardino's CDBG and HOME Consortium. Program administration is provided by the County's Department of Community Development and Housing with input from the City. The City receives an annual allocation of CDBG funds through the County each year.

CDBG funds are provided by HUD and are meant to be a flexible way of providing communities with the resources to provide suitable housing, improve livability, and enhance economic opportunity, with the provision of affordable housing being one of the program's major goals. Eligible activities include acquisition, rehabilitation, homebuyer assistance, economic development, homeless assistance, and public services.

The City has implemented CDBG funding to make neighborhood improvements and fund service providers including:

- Alleyway Improvement Paving in CDBG Target Areas
- Removal of architectural barriers at various public city facilities (Americans with Disabilities Act [ADA] improvements)
- Sylvan Park restroom rehabilitation
- Funding to service providers:
    - Family Service Association of Redlands
    - YMCA of the East Valley

- Inland Temporary Homes
- Boys and Girls Club
- San Bernardino Sexual Assault Services
- Steps 4 Life (Rapid Re-Housing Program)

In fiscal year 2020-2021, HUD allocated $427,405 in CDBG funds to the City of Redlands.

3.16.2 San Bernardino County

Despite the City's eligibility for direct receipts of HUD money, the City passes much of its federal and state funding to the County for administration and distribution. The County works with the City in directing the use of these funds. For programs that provide assistance to eligible households who apply, such as rental and repair aid, the County relies on the City to advertise and direct local households to these programs.

3.16.2.1 Mortgage Revenue Bond Program

San Bernardino County sells bonds to finance the construction of affordable rental units throughout the County. Proceeds from the sale of the tax-free bonds (and sometimes taxable bonds) are used to provide loans at interest rates below market rate for the construction, acquisition, and/or rehabilitation of multifamily housing developments. A specified number of units are required to remain affordable to eligible, low-income households for a specified number of years after the initial financing is provided.

In recent years, this program has not been used much due to the low interest rates available in the marketplace, removing much of the cost benefit of using tax-exempt bonds. However, an increase in interest rates or in tax rates would likely increase usage of the program. The County of San Bernardino Department of Community Development and Housing estimates that market interest rates need to rise above 5.5-6.0 percent for tax-exempt bonds to be attractive. Past usage of the program has resulted in 100 multi-family units supported by the bonds built in Redlands.

3.16.2.2 Emergency Solutions Grant (ESG) Program

ESG funds are used to provide shelter and related services to the homeless. The County distributes funds to agencies that operate shelters or provide hotel vouchers. Family Service Association of Redlands, which helps people stay in their homes by helping pay utilities, is one of the recipients of ESG grants.

According to the 2018-2019 CAPER, the County received $1,074,413 in ESG funds in fiscal year 2018-2019.

3.16.2.3 HOME Investment Partnership Program

The County's HOME Grant is administered by the County of San Bernardino Department of Community Development and Housing.

The County uses HOME funds toward four different programs:

1. *Community Housing Development Organization (CHDO) Program.* CHDOs are funded by the HOME Program, which is obligated to reserve 15 percent of its annual funding to support housing construction, acquisition, or rehabilitation projects by certified CHDOs. Redlands has two active CHDOs: Housing Partners I and Redlands Christian Home.

2. *Rental Property Acquisition and Rehabilitation Assistance Program*. This program provides low-interest loans to developers of rental properties, in order to allow them to acquire or rehabilitate existing housing units and make them available to low-income households.

3. *Tenant Based (Rental) Assistance Program (TBA).* The TBA Program assists qualifying households earning less than 50 percent of the AMI with rent payments on an ongoing basis, and may also provide one-time assistance toward a security deposit.

3.16.2.4 Neighborhood Initiative Program

This HUD-based economic development program consists of grants assigned to specific entities by the Congress.

3.16.2.5 San Bernardino County Rent Relief Program

As a result of the COVID-19 pandemic, San Bernardino County established the San Bernardino County Rent Relief Partnership, an emergency rental assistance program that will leverage more than $46.8 million in US Treasury funds to provide rental assistance to County residents impacted by the COVID-19 pandemic. Payments from the program are based on 12 months of past due rent balance from March 13, 2020, and households must have an income at or below 50 percent of AMI.

3.16.2.6 Housing Authority of the County of San Bernardino

HACSB administers the Housing Services programs, which include the Housing Choice Voucher and the Five-Year Lease Assistance programs. At present, HACSB owns 120 housing units in the City of Redlands.

Housing Choice Voucher Program

The Housing Choice Voucher program is a rental assistance program that helps very low-income families to live in market-rate housing units rather than public housing. Households are provided with vouchers that are paid to private market-rate landlords, who are then reimbursed by HUD. In addition to the regular voucher program, HACSB administers special housing programs. These programs include the Veterans Affairs Supportive Housing (VASH) Program, Mainstream Program, Housing Opportunity Persons with Aids (HOPWA), and Shelter Plus Care.

- The VASH Program is for homeless veterans with severe psychiatric or substance abuse disorders. HACSB and Veterans Administration Medical Center (VAMC) have partnered to provide rental vouchers and supportive services to eligible veterans. The veteran must demonstrate to the VAMC that he/she is homeless (has been living outdoors, in a shelter, in an automobile, etc.) before being evaluated for this program.

- The Mainstream Program is designed to provide assisted housing to persons with disabilities to enable them to rent suitable and accessible housing in the private rental market. Mainstream applicants are offered a voucher as allocations become available.

Participants must be participating in programs of rehabilitation and/or support services within the community that are directly related to their disability.

- HOPWA was established by HUD to address the specific needs of persons with HIV/AIDS and their families. HACSB has partnered with Foothill AIDS Project to offer rental assistance and supportive services to individuals with HIV/AIDS. Participants are given housing choice vouchers and ongoing assistance with medical and emotional needs.
- The Shelter Plus Care Program was designed to contribute to the countywide public/private partnership system to strengthen services available to homeless families and individuals. Families are referred to HACSB by the Department of Behavioral Health and must comply with supportive service providers. Linking affordable housing to resources and services ranging from job training, health care, day care, and education allows the tenants an opportunity to attain economic and social independence.

Term-Limited Lease Assistance Program

Implemented in 2012, the Term-Limited Lease Assistance Program provides non-elderly/non-disabled households with a five-year term limit on rental assistance—hardship exemptions are available. Designated staff is available to provide coaching and refer families to supportive services and employment opportunities. Families assisted by this program include new non-senior/non-disabled households pulled from the Tenant-Based Voucher Rental Assistance Program waiting list; port-in households; and certain households that move out of certain Project-Based Voucher housing programs.

Project-Based Voucher Program

The Project-Based Voucher Program provides rental assistance to households living in specific housing sites. Because the rental assistance is tied to the unit, a family who moves (voluntarily or through eviction) no longer qualifies to receive housing assistance. The Housing Authority administers different waiting lists by bedroom size for each project-based housing site. These housing sites are either multi-family or senior housing developments. At this time, there are 553 housing units utilizing the Voucher Program in the City of Redlands.

Steps 4 Life Community Services- Transitional Supportive Housing

Steps 4 Life is a public service project that provides various services to low and moderate income persons, including people who are homeless. The total project budget is $13,106. The City of Redlands will use $12,200 for project implementation and $906 for Activity Delivery Costs incurred by San Bernardino County.

Pilot Homeless Programs

Administered by HACSB, families receiving rental assistance from more than one year can apply The Housing Authority has the following pilot homeless programs. Homeless individuals and families are referred to these programs through the County's Coordinated Entry System.

- **No Child Left Unsheltered -** Focuses on housing street homeless families with children. Goals are to improve educational and well-being of the children and economic advancement of the parent(s).
- **Golden Apartments -** Permanent supportive housing site for homeless individuals/families. Golden Apartment residents are housed using the Housing First approach which is a model that connects homeless individuals to permanent housing without preconditions to entry.
- **Desert Haven Apartments** - Permanent supportive housing site for homeless individuals/families. Desert Haven Apartment residents are housed using the Housing First approach which is a model that connects homeless individuals to permanent housing without preconditions to entry.

Public Housing Program

The Public Housing Program—also known as the Affordable Housing Program—provides rental assistance to households living in housing units that are owned and managed by the Housing Authority. At this time, the Housing Authority does provide any public housing in the City of Redlands.

Home Ownership Preparation and Education (HOPE) Program

Administered by HACSB, families receiving rental assistance from more than one year can apply for HOPE, which includes classes and aid toward assisting with home ownership. Subsidies include a voucher to help meet monthly home ownership expenses and a deduction on mortgage loan interest.

3.16.2.7 CALHFA Mortgage Assistance Corporation

The California Housing Finance Agency Mortgage Assistance Corporation (CalHFA MAC) is a nonprofit corporation separate from CalHFA. CalHFA MAC was created specifically to receive and disburse federal funding to qualifying California homeowners as part of the "Keep Your Home California" program.

Keep Your Home California is a federally funded program to help California homeowners struggling to pay their mortgages due to financial hardships. California has received nearly $2 billion in federal funding and works with housing counselors, servicers and housing advocates to provide assistance that will help prevent avoidable foreclosures. Funding is currently available through 2017. There are four types of assistance under the Keep Your Home California program including: (1) Unemployment Mortgage Assistance, (2) Mortgage Reinstatement Assistance, (3) Principal Reduction, and (4) Transition Assistance.

- Unemployment Mortgage Assistance Program. Provides mortgage assistance of up to $3,000 per month for unemployed homeowners who are collecting or approved to receive unemployment benefits from the State of California's Employment Development Department (EDD).

- Mortgage Reinstatement Assistance Program. Provides funding of up to $25,000 to help qualified homeowners catch up on their mortgage payments.
- Principal Reduction Program. Provides financial assistance to help pay down the principal balance of a mortgage loan and allow for a more affordable monthly payment.
- Transition Assistance Program. Provides financial help to make a smooth transition into stable and affordable housing.

4 CONSTRAINTS

4.1 GOVERNMENT CONSTRAINTS

The Redlands General Plan and Zoning Ordinance establish locations where housing can be built and identify housing density, lot size, setbacks, and required site improvements. These land use controls can be viewed as constraints in that they determine the amount of land to be developed for housing and establish a limit on the number of units that can be built on a site.

4.1.1 General Plan Policies & Ballot Measures

4.1.1.1 Growth Management Ordinance

The Growth Management Ordinance grew out of the first growth management voter initiative, Proposition R, which Redlands voters passed in 1978. The Growth Management Ordinance is located in Title 19 of the Redlands Municipal Code and was included in direct response to the ballot measures.

4.1.1.2 Annual Development Limitation and Recent Growth

Proposition R was amended by Measure N (a zoning ordinance) in 1987; this policy restricts the development of residential dwelling units to 400 units a year within the city, and the extension of utilities to 150 units per year outside the existing city limits (within the Sphere of Influence, and therefore in the County of San Bernardino's jurisdiction). Of the 400 units within the city, 50 are, by resolution, reserved for single family homes, duplexes, triplexes and four-plexes on existing lots; the remainder are allocated on a point system (adopted as Ordinance No. 2036), which emphasizes design amenities. (This point system is described in the Residential Development Allocation section that follows.) However, as noted in the State Law Preemption section below, these provisions have been rendered null and void while SB 330 is in effect. The City Council adopted Resolution 8082 in 2020 suspending enforcement of the annual building permit limit as long as SB330 is in effect.

Measure U, adopted by the voters in 1997, further articulated growth management policies. This General Plan Amendment reinforced and modified certain provisions of Measure N, adopted Principles of Managed Growth, and reduced the development density of San Timoteo and Live Oak canyons by creating a new land use category: Resource Preservation. This particular aspect of Measure U has a negligible effect on the ability of the City to accommodate future residential development because it concerns an area of

the city with steep hillsides, natural resources, 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 re-designated 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. The slowing of population growth in the City (see Table 2-1: Redlands Population Since Incorporation 1888-2020) coincides with the implementation of Measure U. While these occur simultaneously, it is not likely that Measure U was responsible for the slowing growth. Other factors such as the Great Recession and its effect on the housing market and the maturing of the City likely played a more significant role in slowing population growth. Regardless, provisions limiting growth have a negative effect on the provision of housing across income levels.

4.1.1.3 Density and Super Majority

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."

The supermajority vote and required findings could potentially create a significant constraint on the development of lower- and moderate-income housing, much of which would fall between 12-30 du/ac (townhomes and garden-style apartments). However, no residential projects have been denied based on inability to achieve a 4/5 vote. Nevertheless, as detailed in Program 1.1-2, the City will be evaluating this along with other provisions of Measure U for consistency with recent changes in state housing law.

4.1.1.4 Level of Service

Measure U also specifies that a level of service (LOS) of C is required for new developments and that in areas already below a LOS C, no new development may be approved that worsens the LOS. Another part of the measure (5.20c) requires that development proposed for an area already below a LOS C is required to improve the LOS to a LOS C.

The requirement that a proposed development in a congested area mitigate all existing traffic could potentially create a significant barrier for redevelopment in the urbanized core. However, the City has established a process by which residential projects in the core, the most transit-rich area of the City, can apply for an exemption from Measure U, which effectively removes this constraint. This exemption process is discussed in more detail in Section 4.1.1.8 below (Meeting the RHNA Under Measure U).

The City will be evaluating this requirement in Program 1.1-2, which will evaluate all Measure U provisions for consistency with state housing law.

4.1.1.5 Socioeconomic Cost/Benefit Study

Measure U requires that a socioeconomic cost/benefit analysis (SCBS) be prepared for discretionary projects and projects involving structures larger than 5,000 square feet. City staff have an economic model that is used for this analysis. The fee assessed for this analysis is relatively small ($3,265) and minimal staff time is required to analyze a project using the economic model. No proposed housing project has been denied based on the outcome of its SCBS analysis.

For the above reasons, the SCBS does not pose a significant constraint on new development. Residential development that has been determined to be exempt from Measure U pursuant to the process outlined in Section 4.1.1.8 below is not subject to this requirement. Nevertheless, the City will be evaluating this requirement in Program 1.1-2, which will evaluate all Measure U provisions for consistency with state housing law.

4.1.1.6 Housing Type Balance

Measure U also amended the Redlands General Plan Land Use Element to "plan for" a housing mix of 75 percent single-family and 25 percent multi-family dwelling units at buildout. The City Council has adopted a clarifying resolution of this policy that further adjusts these numbers by determining that "for-sale" condominiums (which are considered multi-family dwellings by the Census and the Department of Finance) will be considered single-family dwellings for purposes of maintaining the Housing Type Balance.

The City Council has requested that staff monitor the housing mix periodically and provide reports to the City Council. Staff evaluated and prepared a report to the City Council based upon data as of June 4, 2019. It was found that as a result of development activity that the 75/25 housing mix ratio was being achieved. The report identified the housing mix to be 74.31 percent single family and 25.69 percent multifamily as of 2019. According to City staff, no new development has been recorded that would significantly affect the housing mix ratio reported in 2019.

However, meeting current RHNA requirements at the densities allocated for low- and very low-income housing could cause the Housing Element to come into conflict with the General Plan Land Use Element if the Housing Type Balance shifts to accommodate new housing units accommodated under the 6th Cycle RHNA. While the City is only required to "plan for" a housing mix of 75 percent single-family and 25 percent multi-family dwelling units, this legislative discrepancy can be a potential constraint.

The Growth Management Ordinance, more so than the 75/25 ratio, could limit development. Government Code Section 65589.55 stipulates that low- and moderate-income housing may not be constrained in a way that makes it infeasible (such as through design review or growth management regulations), unless: the project is not necessary to meet the city's RHNA; it would have specific negative impacts on health and safety; it is infeasible due to state or federal law; it is proposed on a site zoned for agriculture, resource preservation, or lacking utility infrastructure; or if it is inconsistent with the zoning and land use designation defined in the Zoning Ordinance and General Plan, respectively. The City could not, therefore,

[5] Report E-5; California Department of Finance.

reject an application for a low- or moderate-income housing development on the basis that the City would exceed the planning ratio of 75 percent single family to 25 percent multifamily.

Furthermore, the 75/25 ratio is not meant to be applied to individual development projects, but rather is a broad planning goal the City has as it conducts long-range planning, such as preparing specific plans. It has never been used as a consideration in review of individual applications, nor has it been presented as information in staff reports for development projects consistent with General Plan and zoning designations. Furthermore, the precise ratio will always change and fluctuate slightly as development projects and housing units are built throughout the city. Since Measure U was adopted in 1997, it has never been the basis of denying a multi-family project. Additionally, the ratio is a planning target used to guide the General Plan's land uses, but will not prevent the City from effectively planning for its RHNA. Therefore, this Measure U requirement is a potential constraint on housing. City staff will continue to monitor the ratio of single-family units to multi-family units. Please see Program 7.1-7 in Chapter 7 for further clarification of the 75:25 ratio.

The City will be evaluating this requirement in Program 1.1-2, which will evaluate all Measure U provisions for consistency with state housing law.

4.1.1.7 No Environmental Impact

Measure U requires a finding that "the proposed density increase will not cause adverse environmental impacts, either individually or cumulatively, directly or indirectly." This requirement does not include any qualifier of "significant" and is virtually impossible to meet, literally given that all projects will have some form of impact. This finding also is in conflict with the California Environmental Quality Act (CEQA) and does not acknowledge that significant adverse impacts can be mitigated or allowed subject to findings of overriding consideration. In practice, the City has relied on the environmental documentation prepared under CEQA to make this finding, accepting mitigation measures identified in the project Mitigated Negative Declaration. It is unclear how the City would make the finding when significant and unavoidable impacts are present.

Residential development that has been determined to be exempt from Measure U pursuant to the process outlined in Section 4.1.1.8 below is not subject to this requirement. Nevertheless, the City will be evaluating this requirement in Program 1.1-2, which will evaluate all Measure U provisions for consistency with state housing law.

4.1.1.8 Meeting the RNHA Under Measure U

The growth management system constrains Redlands' ability to accommodate its RHNA. 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, moreover, could 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. Therefore, during the time that SB 330 is in effect (likely through 2030), the City is not obligated to track/monitor the 75/25 ratio target, so as to eliminate any impact 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.

4.1.2 State Law Preemption

4.1.2.1 Housing Crisis Act

The Housing Crisis Act (SB 330/ Government Code Section 66300 et seq. and 65589.5) significantly curtails the authority of local governments to delay, deny, or reduce the density of housing projects that comply with objective standards. Additionally, until 2030, the law supersedes local growth management ordinances that limit the number of units that can be permitted or constructed. From SB 330:

"(E) Notwithstanding subparagraph (D), an affected county or affected city may enforce a limit on the number of approvals or permits or a cap on the number of housing units that can be approved or constructed if the provision of law imposing the limit was approved by voters prior to January 1, 2005, and the affected county or affected City is located in a predominantly agricultural county. For the purposes of

this subparagraph, "predominantly agricultural county" means a county that meets both of the following, as determined by the most recent California Farmland Conversion Report produced by the Department of Conservation:

i. Has more than 550,000 acres of agricultural land.

ii. At least one-half of the county area is agricultural land.

Any development policy, standard, or condition enacted on or after the effective date of this section that does not comply with this section shall be deemed void."

The above section directly overrides the 400 unit/year limit, as well as the Residential Development Allocation point system used to prioritize the proposed projects until 2025. The Housing Crisis Act also supersedes the single family to multifamily unit ratio, as this in effect creates a cap that will not allow the City to achieve the RHNA allocation.

Additionally, the potential bill SB 8 (2021) could extend SB 330's provisions until 2030.

4.1.3 Urban Growth Boundary

The City does not have an adopted urban growth boundary, but the growth management policies limit development outside of city boundaries. The City of Redlands is roughly 36 square miles. The City's Sphere of Influence extends east of the city, spanning nearly 45 square miles, but excludes a 1,100-acre "island" of unincorporated county land in the northwestern portion of the City.[6] (The City provides services to this area in exchange for a 90 percent share of sales tax revenues.) Proposition R, as amended, allows 150 dwelling units per year within the SOI (but outside city boundaries) to apply for annexation. Although the City may only regulate development within its boundaries, the San Bernardino County General Plan policies commit the County to support annexation of land designated for urban development.

4.1.3.1 City Design and Preservation

The City has established a number of design and preservation policies to improve the livability of Redlands. To a large extent this involves design and not necessarily additional cost to the developer. Additional time in designing developments is generally offset by the quality of the end project. Still, it is recognized that additional time for preparing a project and amenities added to a project to meet the design standards may add to the housing costs, and thus serve as a potential constraint.

Under the 1995 General Plan update, the City has a City Design and Preservation Element. Under the 2017 General Plan update, that element was removed and the entire General Plan restructured. The policies in the Livable Community chapter of the General Plan (Land Use Element) describe the City's priorities within specific communities and, as a result, where future residential development is and is not appropriate. While some of these policies are implemented via ordinance, others follow from the General Plan itself. The Livable Community chapter includes specific land use designations meant to limit development in environmentally sensitive areas such as in and around San Timoteo Creek. City design policies specifically

[6] The Island was removed from the City's Sphere of Influence several years ago as a result of Assembly Bill 1544, which was signed into law by Governor Gray Davis in 2000.

seek to preserve agricultural land, particularly Redlands' iconic citrus groves; however, there are very few protections for privately owned groves/orchards within the City limits. As a result, much of the City's newer development in North Redlands has occurred on former citrus groves. Moreover, the land use designations work synergistically with the City design policies to protect valuable land. For example, in Crafton (within the SOI), citrus groves are protected through the Rural Living General Plan land use designation that permits up to one unit per 2.5 gross acres on slopes under 15 percent and one unit per 5 gross acres on slopes 15 percent or greater.

Some policies within the General Plan are intended to protect the unique character of existing neighborhoods. Future development in the San Timoteo/Live Oak canyons area is limited in order to maintain the "backcountry" character of the area while also protecting sensitive habitats and landscapes and having the additional benefit of limiting development in a very high fire hazard area. By prohibiting grading of canyon walls, exceeding 50 percent slopes and protecting "signature ridges," the policies in the General Plan and the Southeast Area Plan limit opportunities for residential growth. Similarly, a housing conservation overlay district was applied in parts of South Redlands in order to maintain existing scale and character where homes and neighborhoods have been identified and registered as local areas of historical significance. In addition to older established neighborhoods, historic structures and districts are also protected within the General Plan through ordinances that require Historic and Scenic Preservation Commission review and only permit designs, and uses that preserve their character and amenities. While these requirements create potential constraints on the production of housing, they are essential to preserve the City's historic character and high quality of life.

Properties in historic districts or having been individually designated as historic must first obtain a Certificate of Appropriateness prior to obtaining a building permit. This process increases the amount of time between application and permit issuance; however, it also helps to maintain the iconic character of historic Redlands' neighborhoods. City staff aids applicants and guides them through design and materials selection. The City also administers the Mills Act program to reduce costs for property owners in historic districts.

While review of projects in historic districts does require consideration by the Historic and Scenic Preservation Commission, the City has recently demonstrated its commitment to weigh the need for housing over community character. In December 2021, the City Council voted unanimously to approve a small subdivision on a historic citrus grove that is home to a Victorian grove house.

To mitigate the impact of these policy requirements, policies to reduce processing time (Programs 7.4-5 and 7.4-10), and, where possible, increase density of projects (Programs 7.2-10 and 7.9-1) have already been adopted to provide for lower-cost housing and to lessen the potential financial impact caused by design considerations. Furthermore, some of the General Plan policies listed below, under "Historic and Scenic Preservation," could potentially aide in the preservation of affordable housing units in the city's historic neighborhoods as several large historic homes have been converted into multi-family apartments.

4.1.4 Zoning Ordinance Requirements

The City has established standards for each of its residential zoning districts. Zoning requirements can serve as a constraint to housing production by limiting or prohibiting various types and styles of

development. However, the lot size, unit density, height, lot coverage, setbacks, open spaces, design review, and parking standards are decided upon to ensure a certain quality of life for residents within and adjacent to a development.

4.1.4.1 Residential Zoning Districts

Table specifies development standards for various residential zones. If conflicts with the zoning criteria arise (generally with development applications), the City evaluates standards in different, comparable zones. As a standard or set of standards is found to be inappropriate, it is reevaluated and amended to reflect current needs (see Program 7.4-6).

The City permits mobile homes in all of its residential zones subject to a plan check and the requirement the mobile home is situated on a permanent foundation. Mobile home parks are permitted subject to the granting of a conditional use permit. As of March 2021, the city contained approximately 764 mobile homes.[7] Mobile homes are a reliable source of affordable housing and the City has a rent stabilization policy for mobile home parks.

The City has a second unit ordinance (Chapter 18.156, Article VII (Second Residential Dwelling Units) that is preempted by state law. These secondary units are independent units on existing single-family lots. About 13 second units per year were built during the last year. To better promote the option of creating second units amongst homeowners, the City will continue its public awareness campaign of promoting ADU development in the City, as well as adopting an ADU Ordinance to guide the development of ADUs within the City. (See Program 7.1-6).

[7] Based on Redlands' Parcel Data (ExistingUnitsField).

TABLE 4-1: CITY OF REDLANDS: RESIDENTIAL ZONING CLASSIFICATIONS

Zoning District	Min Lot Size (sf unless noted)	Dwelling Units per Acre	Max Lot Coverage	Min Width	Min Depth	Max Height	Min Yards (feet)		
							Front	Side	Back
Rural Residential (R-R/R-R-A)	1 acre	1	10	125	125	2.5 stories or 35 feet	25	10	25
Residential Estate (R-A/R-A-A)	20,000	2	20	100	120				
Residential Estate (R-E)	14,000	3	25	100	120				
Suburban Residential (R-S)	10,000	4	30	85	100				
Single-Family Residential (R-1)	7,200	6	30	60	100				
Single-Family Residential (R-1- D)	8,100	10	35	50	160		25	5	25
Multiple-Family Residential (R-2)	8,000	14	45	80	100		25	5-10	25
Multiple-Family Residential (R-2- 2000)	12,000	17-22[2]	45	100	120	3 stories[3]	25	5-10	25
Multiple-Family Residential (R-3)	10,000	27[2]	60	80	120	4 stories[3]	15-25	5-10	25

Source: City of Redlands Municipal Code.

1. Density calculated from minimum lot size and dwelling units per lot and rounded down to nearest whole number up to what is permitted by the 2035 General Plan.

2. A 4/5 majority of the City Council is required to approve projects with densities above 18 du/ac.

3. A 4/5 majority of the City Council is required to approve projects with proposed height above 2.5 stories or 35 feet.

Minimum Lot Size Requirements

As shown in Table 4-1, minimum lot sizes for the R-2, R-2-2000, and R-3 multifamily residential districts are 8,000, 12,000, and 10,000 square feet, respectively. While these minimums are quite low and do not typically limit development on smaller lots, minimum lot sizes act as potential constraints on development of small multi-family projects.

Additionally, the Rural Residential and Residential Estate minimum lot sizes of 1 acre and 14,000/20,000 square feet may be a constraint by limiting new housing due to the large lot sizes. While most of the City's housing growth is not anticipated to occur in the more rural areas of the City, the minimum lot sizes in these districts directly limits density and affordability.

Planned Residential Developments (PRDs) provide more flexibility to housing developments approved as subdivisions, allowing for zero lot line development and small lot subdivisions (see Program 7.4-6). PRDs require Conditional Use Permits and for a minimum of 20 percent (depending on the zone) of the subdivision to be preserved as open space. This may be applied to any residential or agricultural district that allows residential development. These requirements could potentially be constraints on new housing; however, as the PRD acts to ensure that open space is preserved, and also allows for more flexible design and lot configuration. Therefore, the PRD program is not considered a constraint on housing production.

Nonresidential Zoning Districts That Permit Residential Uses

Several other districts permit residential development. Generally, residential uses within non- residential districts will follow the provisions in the adjacent residential district or a district with comparable lot sizes.

- **A-1 Agricultural District**: Single-family residences with no more than two dwellings units per each parcel of five acres or more, or one dwelling for each lot, if less than five acres.
- **A-1-20 Agricultural District**: Single-family residences with no more than two dwelling units per each parcel of 20 acres or more, or one dwelling for each lot, if less than five acres.
- **A-2 Estate Agricultural District**: Single-family dwellings with no more than one dwelling per each lot.
- **MF Medical Facility District**: Residential uses, subject to the requirements and property development standards of the nearest residential zone.
- **T Transitional District**: Residential uses that are permitted in the residential district adjacent to the T district, subject to the requirements and property development standards for the particular residential district.
- **A-P Administrative and Professional Office District**: Residential uses permitted in the R- 3 Multiple Family Residential district, subject to the regulations of that district.
- **A-P-C Administrative Professional Commercial District**: Residential uses permitted in the R-3 Multiple Family Residential district, subject to the regulations of the R-3 district.
- **Downtown Specific Plan, TC Town Center District**: Single-family, multi-family, and mixed-use residential uses permitted.
- **Downtown Specific Plan, TC-H Town Center Historic District**: Single-family, multi-family, and mixed-use residential uses permitted.
- **Downtown Specific Plan, SC Service Commercial District**: Single-family, multi-family, and mixed-use residential uses permitted.[8]

The A-P, A-P-C, TC, TC-H, and SC districts, as listed above, allow mixed-use, residential development. In the A-P and A-P-C districts, residential development is allowed subject to the regulations of the R-3 district

[8] The TC, TC-H, and SC are zones within the Transit Villages Specific Plan.

(see Table 4-1). In 2010, City Council adopted Ordinance No. 2739, which increased the density allowed in the R-3 and equivalent districts to 30 units per acre. The R-3 district has a 60 percent maximum lot coverage requirement and allows up to four stories.

Other nonresidential districts allow residential uses as a conditional use. Requiring a conditional use permit for residential uses constrains the development of multi-family housing in these districts.

- C-3 General Commercial District: Residential uses conditionally permitted as long they are combined with nonresidential uses in an existing or new building and provided that they comply with the regulations of the R-3 Multiple Family Residential district.
- C-4 Highway Commercial District: Permits conditional uses allowed in the C-3 district; therefore residential uses are conditionally permitted as long they are combined with nonresidential uses in an existing or new building and provided that they comply with the regulations of the R-3 Multiple Family Residential district.

While zoning designations described above serve to restrict residential development in non- residential zones, the City is actively promoting the Transit Villages Specific Plan that contains opportunities for mixed-use and transit-oriented development. The City has identified housing sites in downtown, many of which are ideal for very low- and low-income housing development, because of the high densities permitted in this area; however, the constraints of Measure U persist with the requirement of a 4/5th vote of the City Council to approve projects above 18 du/ac or above 2.5 stories/35 feet high.

4.1.4.2 Transit Villages Specific Plan Zoning Districts

The City strives to revitalize the downtown as part of citywide economic development objectives. During the 1980s, the Downtown Revitalization Program strengthened the downtown and brought significant private investment. The current Downtown Specific Plan contains three zoning districts: Town Center, Town Center-Historic, and Service-Commercial. All three districts allow single, multi- family, and mixed-use residential projects as a permitted use.

The City has prepared a draft Transit Villages Specific Plan (TVSP) and environmental review is currently underway. The 2035 General Plan introduced the Transit Villages Concept and a substantial portion of the Livable Community chapter is devoted to establishing the policy framework to implement the future transit villages within approximately a one-half mile radius of each of the three train stations in Redlands.

Section 4.5 of the General Plan provides that “Transit Villages” have the following characteristics:

- Densities and intensities that promote working and living environments proximate to transit;
- Pedestrian and bicycle access to the station, with safe and comfortable pathways; and
- A transportation system that encourages and facilitates intermodal service and access.”

Section 4.5 of the Livable Community chapter states, “The Transit Village Areas Strategy consists of the following:

- A Transit Village Overlay Zone (TVOZ) of mixed uses, which includes an area of focused streetscape and public realm improvements.
- Base land uses consistent with the land use classifications described in Section 3.1 of the General Plan, designed to foster higher intensities and compact development patterns.
- A Mixed Use Core where a mix of uses and higher densities and intensities would be encouraged through policies and standards in the Transit Village Plan."

Based on the 2035 General Plan, the draft TVSP refines those policies into a detailed set of rules and development standards so that future projects can achieve the community's vision for compact and walkable transit villages. The TVSP has the intention of accommodating a mix of uses such as residential, retail, commercial, and office types of land uses within an approximately half-mile radius with sufficient density and intensity to support self-sustaining neighborhoods. Density and intensity of uses (in terms of numbers of workers, shoppers, visitors, and residents) are also very important elements, because a sufficient number of people need to be present and utilizing the villages so that they are self-sustaining and financially feasible. The TVSP covers 947 acres, or approximately 4 percent of the total land area of the City. Approximately 85 percent of land within the TVSP area is developed. In comparison to residential zoning districts (development standards for which are listed in Table 4-1), the TVSP zoning districts provide form based development standards and allow for dense development, subject to Measure U requirements, and promote a mix of uses. Eight zones would be established under the plan:

1. Village Center (VC) – applies to the parcels immediately surrounding the three stations. Buildings may reach a height of four stories and are mixed-use, all residential, or all office. Parking is located behind buildings or subterranean.
2. Downtown (DT) – applies to parcels facing State Street east of Orange Street and along the east side of Orange Street between the railroad right of way and State Street. New buildings up to three stories in height accommodate a mix of uses with commercial ground floors and residential or commercial upper floors. Parking is located behind buildings, subterranean, or in park-once lots or structures.
3. Village General (VG) – applies to parcels located around the periphery of the three stations. This zone enables multi-family and mixed-use buildings with an average height of three stories. Parking is located behind buildings or subterranean.
4. Village Corridor (COR) – applies to parcels along the north side of Colton Avenue, both sides of Orange Street north of the I-10 freeway, and both sides of Olive Avenue. This zone enables small-scale mixed-use buildings up to two stories in height with commercial ground floors and residential or commercial upper floors. Parking is located behind and to the sides of buildings, subject to minimum street-facing building frontage requirements.
5. Neighborhood General 1 (NG1) – applies to parcels located between Sixth Street and Church Street. It enables small-scale commercial and house-form buildings up to 2 stories high that

accommodate commercial, light industrial, and live-work uses. Parking is allowed behind and to the side of buildings, subject to minimum street-facing building frontage requirements.

6. Neighborhood General 2 (NG2) – This zone enables house-form buildings that accommodate residential and office uses. New buildings are up to two stories in height and are set back from the sidewalk behind yards. Parking is located behind new buildings.

7. Special District (SD1) – applies to school and other institutional sites. New buildings accommodate educational, religious, and other civic uses. Parking is located in surface parking lots or garages.

8. Civic Space (CS) – applies to parks, plazas, greens, and other open spaces within the Specific Plan area. These open spaces accommodate small structures such as gazebos, restrooms, and community centers.

As for parking requirements, minimum off-street parking spaces are provided in the TVSP and, for residential uses, are based on unit size, and gross floor area for commercial uses. Generally, the parking requirements in the TVSP are slightly lower than the parking requirements provided in the Municipal Code due to the transit-oriented character and convenient pedestrian access within the transit villages.

4.1.4.3 Affordable Housing

The Housing Resources section identifies different zones and suitable sites that may accommodate affordable housing need. The City intends for the TVSP to facilitate smart growth and new residential development around the new Metrolink/Arrow light rail stations. The plan contains progressive mixed-use development standards that will increase the sites available for affordable housing. Additionally, the City is including programs to upzone the RHNA sites outside of the TVSP area to further improve capacity for affordable housing. The City also has examples of two recent affordable housing projects that occurred in medium-density multi-family areas. These recent projects support that land zoned for less than 30 du/ac can also support affordable housing.

4.1.4.4 Multi-Family Development

Pursuant to the Zoning Ordinance (Section 18.192.020), all multi-family developments containing 35 or more dwelling units are subject to a conditional use permit (CUP). The findings of approval for a CUP are as follows:

- That the proposed development will not adversely affect the applicable land use plans of the City;
- That the proposed development will not be detrimental to the public health, safety and welfare;
- That the proposed development will comply to the maximum extent feasible with the regulations of the City's General Plan, the applicable zoning district and the City's development standards; and
- That the proposed development is appropriate at the proposed location.

These requirements were adopted because of the potential for neighborhood conflicts due to traffic, noise, and aesthetic concerns. A public hearing, which is a requirement of the CUP, gives neighborhoods the opportunity to participate, voice their concerns, and ensure that the projects are as compatible as possible with existing development. Conditional Use Permits are a potential constraint by adding uncertainty and extending the potential for delay in project processing. Multi-family developments within the TVSP are permitted uses (unless greater than 35 units), and processed through a Commission Review. Approval is required of all new construction over 500 square feet and the 4/5th City Council vote may apply for density and height approval. There is currently no difference in the permitting process for multi-family rental developments from other, for-sale, multi-family developments in the City.

Program 1.2-13 is included to remove the CUP requirement for multi-family developments greater than 35 units.

4.1.4.5 Density Bonus Provisions

The state density bonus law provides a maximum density bonus of 50 percent. To be eligible for the maximum bonus, a project must set aside at least 15 percent of total units for very low income households, 24 percent of total units for low income households, or 44 percent of for-sale units for moderate income households. Levels of bonus density between 35 percent and 50 percent are granted on a sliding scale, depending on the number of affordable units.

4.1.4.6 Housing Type Variety

The City's Zoning Ordinance allows for a variety of housing types. Moreover, "dwelling unit" definitions do not distinguish between constructed and factory-built housing. As per state law, the City does not regulate the number of individuals living in a dwelling unit that is state licensed if that number is six or fewer, nor does the City distinguish between permanent and transitional housing. Therefore, supportive and transitional housing are treated the same as other residential uses in the same zone.

In October 2013, City Council adopted Resolution No. 7322, which allowed for emergency shelter and transitional housing to be constructed in the SC (Service Commercial) district of the Downtown Specific Plan by right. The SC district is 38.1 acres and the most recent point in time count of unsheltered homeless individuals in the City is 47. The SC District could easily support homeless shelters that would meet the City's need. Many properties in the district are highly underutilized, with existing uses consisting of surface parking lots and small or aging structures. Additionally, the district contains 20 vacant parcels, with a total area of 2.9 acres. As the SC district is a part of the Downtown Specific Plan, it has excellent access to employment, commercial and recreational amenities, and educational institutions. This district is also located within 2 blocks of the downtown Metrolink Station. These conditions make the SC district appropriate for emergency shelters.

The Downtown Specific Plan contains a number of specific standards that apply to emergency shelters. The plan specifies requirements for on-site security, parking, storage, pets, on-site management, operational hours, among others. There are no spacing requirements or development standards for emergency shelters that would pose a constraint to development. Program 1.2-1 amends the code for AB 139 compliance. The City has identified Program 7.2-1 to amend the Downtown Specific Plan/proposed

TVSP to comply with the requirements of AB 139 – Emergency and Transitional Housing. The City will reduce the parking requirements, and review all other emergency shelter standards to ensure that they are expressly permitted by AB 139 or are consistent with other uses in the same zone.

Redlands has six single-family and three multi-family residential districts (Table 4-1). Furthermore, the 3,723 total available sites are located in a range of zoning districts. The development standards for these districts generally do not serve to restrict the development of single-family residential structures. The requirements for lot size and private open space are a constraint to small lot multi-family development. Housing is allowed in 10 different nonresidential districts. While only single-family homes are allowed in the agricultural districts and the R-1, R-E, and R-S districts, the minimum lot area, height, and front, side and rear yard standards are not burdensome. The Administrative & Professional Office (A-P) and Downtown Specific Plan/proposed TVSP districts permit single-family and multi-family housing of various types including mixed-use, live/work, emergency shelters, and group homes.

The City's development fees are found in Table 4-2. The fees the City charges do not serve to restrict housing variety.

4.1.4.7 Hillside Slope Standards

The southeastern portion of Redlands contain steep hillsides and canyons. The City initially restricted growth in these areas through Measure N, in order to protect ridgelines from significant grading and preserve scenic vistas. These restrictions have the additional purpose of minimizing flood hazards, erosion from residential and road construction, exposure to wildfire, evacuation efficiency, and potential for groundwater deterioration. The Zoning Ordinance defines a Hillside Development District (HD) for parcels with average cross-slopes greater than 15 percent. In this district, densities are limited to 1 unit per every 2.5 acres in areas with 15 to 30 percent slopes, and 1 unit per every five to ten acres in areas with 30 to 40 percent slopes, respectively. Since the majority of this area is zoned as single-family residential and agriculture uses, the permitted density of the General Plan land use designation of Very Low Density Residential would permit up to 6 du/ac, thus the hillside policy results in fewer dwelling units per acre than would otherwise be permitted by the General Plan. While a constraint in terms of achievable dwelling units, the hillside policy is both practical and necessary to protect valuable environmental resources, limit exposure to hazards, and is generally in line with smart growth practices.

4.1.4.8 Parking Standards

Off-street parking facilities are required for all new dwelling units. Single-family residential dwellings are required to have at least two covered parking spaces per unit. Multi-family residential dwellings require a range depending on the housing type and number of bedrooms. Outside of the proposed TVSP, one-bedroom units are required to provide one parking space, two bedroom units are required to provide one and a half parking spaces, and units that are three bedrooms or more are required to provide two parking spaces. Additionally, all multi-family projects containing more than two units on a lot must provide one uncovered off street parking space for every two units. The parking requirements for multi-family development can serve as a constraint on development by requiring more land area to accommodate surface parking. Ordinance No. 2688 provides reduced off-street parking requirements for mixed-use

projects. The TVSP proposes more streamlined and less burdensome parking requirements that are not viewed as a constraint to development and are suitable for transit oriented development.

While parking standards can constrain residential development, requirements of the state density bonus law allow for reductions in parking requirements in multi-family housing developments, often where housing affordable to very low- and low-income households is located. Tandem parking (where two cars are parked, one in front of the other) and uncovered parking satisfies the parking requirement for second units, another good source of affordable housing.

4.1.4.9 Building Codes

Redlands currently requires residential construction to comply with the 2019 California Uniform Building Code and other standard codes. The City has not amended the building code in a way that would increase the costs of developing housing or increase the time for permitting. Fire sprinkler systems are also a requirement on all new residential units or when an addition of 500 sf or more is constructed (such as an ADU, JADU), which adds a cost between $0.81 and $2.47 ($1.35 on average) per square foot, depending on the unit type.[9]

The City has two full-time Code Enforcement Officers to conduct a proactive code enforcement program, but also responds to complaints or notices received through the City's Redlands 311 reporting app. The City also has a Rental Dwelling Unit Ordinance that was adopted in 2012 and is implemented by the Code Enforcement Division of the Facilities and Community Services Department. The ordinance requires that every rental property obtain a rental dwelling unit permit. The permit must be renewed on an annual basis and the owners are required to keep the rental dwelling unit(s) in compliance with specific standards, particularly those regarding life safety, hazards, and maintenance. The intent of the ordinance is to ensure that the City's rental housing stock is kept and maintained according to state and local health and safety laws. The cost of this permit ranges from $80 to $116 depending on the rental property typology. This fee may pose a financial constraint to property owners of rental housing.

4.1.4.10 Off-site Improvements

Off-site improvements, including public streets, curbing, sidewalks, streetlights, water, sewer, and drainage requirements, have an impact on the cost of residential development.

Section 17.17.020 of the Municipal Code describes a set of required improvements in addition to those stipulated under the tentative map, including upgrades to infrastructure, utility hookups and site design.

1. **Frontage Improvements**: Street structural sections, curbs, sidewalks, driveway approaches and transitions.
2. **Storm Drainage**: Storm drain system improvements to collect and convey on-site storm water run-off; system should not adversely affect abutting and off-site properties.

[9] Home Fire Sprinkler Cost Assessment – 2013, https://www.nfpa.org/News-and-Research/Data-research-and-tools/Suppression/Home-Fire-Sprinkler-Cost-Assessment-Final-Report.

3. **Sanitary Sewers**: Each unit or lot must be served by an approved sanitary sewer system.
4. **Water Supply**: Each unit or lot must be served by an approved domestic water system.
5. **Utilities**: Each unit or lot must be served by gas, electric, telephone and cablevision facilities.
6. **Underground Utilities**: All existing and proposed utilities within the subdivision and along peripheral streets must be placed underground except those facilities exempted by the Public Utilities Commission regulations or if impractical due to physical constraints.
7. **Fencing**: Each parcel or lot within the subdivision that is adjacent to a public facility must have an approved fence or wall adequate to prevent unauthorized access between properties.
8. **Other Improvements**: The City Engineer, in accordance with this Code, the General Plan and City standards and specifications may require other improvements, such as grading, streetlights, fire hydrants, signs, street lines and markings, street trees and shrubs, landscaping, monuments, bicycle facilities, fences and smoke detectors, or in lieu fees.

These off-site improvements are either installed by the developer as part of the project or paid for by impact fees assessed on larger regional or area wide facilities. Off-site improvements are assessed to determine appropriateness of improvements based on need. While these are not unique requirements, they do increase the cost of development. To mitigate the constraint that off-site improvements can place on housing, adjustments and modifications to standard requirements have been granted for PRDs, hillside developments, and rural projects. Furthermore, the vast majority of sites included in the inventory are already adjacent to dedicated streets and have necessary sewer and water infrastructure.

4.1.5 Development Review Process

4.1.5.1 Permit Processing

Residential construction involving individual single-family homes on existing lot, mobile homes, and two- to four-unit multi-family projects are approved at a staff level (ministerial review). Projects are evaluated relative to zoning and building code standards and receive approvals within two to four weeks of application. The City's plan check policy is to complete first submittal plan checks within 10 business days and resubmittal checks within 5 business days.

The City offers a "Preliminary Review" service where plans may be submitted for review and comment by all relevant City departments prior to formal application. However, the City staffs a "One Stop Permit Center" where customers can talk with representatives from Planning, Building, and Municipal Utilities and Engineering to receive guidance and obtain standards for development.

Residential construction involving tracts and larger multi-family projects utilize the following processing schedule.[10]

10 In the case of a developer who wishes to build in an already approved subdivision, often a Planned Residential Development (a conditional use permit) application is processed concurrently with other permits. If the subdivision meets all of the development standards of the zone,

For projects not requiring legislative actions the entitlement process can take as little as 100 calendar days (approximately) if an Initial Study is not required under the California Environmental Quality Act.[11] Steps are:

- (1) submission of complete application,
- (2) Development Review (40 days),
- (3) Planning Commission (30 days).

During this formal application phase, the applicant submits ten sets of plans, appropriate application forms and all required fees. Completeness review by Planning staff and committee review by the Development Review Committee occurs within the first 30 days following application submittal. The applicant then provides additional information and prepares plan revisions (if needed) based on Development Review Committee comments/corrections. Conditions of approval are prepared and any final issues are addressed before the project moves on to public hearing. For the public hearing phase, proposed projects must be included on an agenda in advance. Staff prepares and presents reports on each project. The applicant and members of the public have the opportunity to comment. As for multi-family development, the Zoning Ordinance allows up to 34 units to be approved under a site plan approval process called a Commission Review and Approval (CRA). The site plan proceeds through the same process except that CRAs do not require a public notice or hearing (if a SCBS is required for the project, then Municipal Code Section 16.02.040 requires a public hearing for the SCBS), but do proceed to Planning Commission review.

If the project is subject to CEQA, then an Initial Study must be prepared by the city's environmental consultant(s) and typically requires an additional 90 to 180 days including a 30-day public comment period on the environmental document (e.g., a Mitigated Negative Declaration). Consideration of the project environmental document is part of a public hearing on the entire project. This threshold is a matter of City policy, and could be adjusted upward, although it has not been a factor in inhibiting affordable housing in the past.

For projects requiring legislative actions (General Plan Amendment, Zone Change, Agricultural Preserve Removal, etc.) processing takes approximately 140 calendar days, plus any CEQA environmental review processing requirements. Steps are the same as above plus (4) City Council (40 days).

- Once the entitlements are granted developers prepare for approval of their final map and submit for Residential Development Allocations (RDA).[12] With the RDA process (described below) there is another step that residential developers go through that is not required in neighboring cities. The RDA process takes approximately 60 calendar days; however, it typically is occurring when

there is no further review other than the Residential Development Allocation (RDA) process. All subdivisions of five or more units are required to go through the RDA process unless the subdivision in question is a lot sale subdivision.

11 Projects requiring CEQA review may take an additional 180 days or more to allow for preparation of the environmental document.

12 The RDA process has been temporarily suspended by SB 330 until 2030. (City Council Resolution No. 8082 adopted on 5/19/2020 suspended the competitive evaluation and selection system contained in Municipal Code 19.04.040). The proposed SB 8 may extend this to 2030.

the developer is completing final engineering and completing the final map (as well as finalized home designs), so the timing is not significantly different than in other communities.

- A residential project with five or more units must receive an RDA before it may be granted a building permit. Once an application is filed, it is processed and reviewed and allocations are determined by the City Council.
- Note: With implementation of SB 330 provisions through at least January 1, 2025 (and adoption of City Council Resolution No. 8082 suspending the RDA's competitive evaluation and selection system contained in Municipal Code Section 19.04.040 for the duration of SB 330), the evaluation and approval of multifamily residential dwelling units now occurs simultaneous with the individual project's CRA and/or CUP entitlement process.

The development review process is not different for residential projects included as part of a mixed- use project.

Given that permit processing times are generally in line with other communities in the area, the Redlands development review process does not represent a constraint that is significant, although additional staff resources would enable staff to process projects more quickly. Regulations to include additional environmental assessment, requirements of SB 18, and water quality requirements (all federal, state and regional requirements), etc. have added to the processing time and cost of development in all cities, not just in Redlands. These additional requirements are not generally reflected in the timelines above because this information and requirements are required at time of application submittal and determination of completeness.

Developers can face delays in obtaining building permits after entitlement due to the need to create more detailed plan sets after entitlement approval. Those plans may take several weeks to develop and submit for plan check review; however, the City accepts plan checks "at risk" and many developers take advantage of this option to expedite the permitting process. This process allows the developer to submit their project for plan check review prior to entitlement approval. The plan check is "at risk" as the project may be modified prior to entitlement, but the ability to initiate the plan check process early can result in developers obtaining building permits at the conclusion of the entitlement appeals period.

4.1.5.2 Postings and Notices

The City is compliant with requirements for posting notices of public hearings and discretionary land use decisions. This includes CUPs, variances, zone changes, General Plan amendments, and environmental review, among others. The City has an internal process to track projects and submit notices in the appropriate format to the local newspaper, posting on the City's website, and posting in physical locations in the City's buildings, including outside the Council Chambers and at the City Clerk's office.

4.1.5.3 SB 35 Ministerial Approval Procedure

SB 35 (Wiener, 2017) requires a Streamlined Ministerial Approval Process for developments in jurisdictions that have not made sufficient progress towards their RHNA.

The City of Redlands has yet to receive an SB 35 application. If the City were to receive an SB 35 application, it would follow state law procedure. The City would provide a layout summary and other materials upfront, as well as an optional precomputation to review standards and objective standards. The following permitting procedure that the City will follow is from the Streamlined Ministerial Approval Process guidelines outlined by HCD.[13]

1. After receiving a notice of intent to submit an application for a Streamlined Ministerial Approval Process, and prior to accepting an application for a Streamlined Ministerial Approval process, the City will complete the tribal consultation process outlined in Government Code section 65913.4(b).
2. The City will perform a determination of consistency with regards to objective zoning, subdivision, and design review standards.
3. The City will perform a determination of consistency with density requirements.

The City will complete the design review within the following timeline:

1. Within 60 calendar days of submittal of the application to the City if the development contains 150 or fewer housing units.
2. Within 90 calendar days of submittal of the application to the City if the development contains more than 150 housing units

The City will determine whether the applicant for Streamlined Ministerial Approval complies with requirements, and will approve or deny the application, within the following timeline:

1. Within 90 calendar days of submittal of the application to the City if the development contains 150 or fewer housing units
2. Within 180 calendar days of submittal of the application to the City if the development contains more than 150 housing units.

While the City has yet to receive an SB 35 application, the City will facilitate the process and support any future applicants, as outlined in Program 1.2-19.

4.1.5.4 Residential Development Allocation

The Residential Development Allocation (RDA) process discussed below has been temporarily invalidated by SB 330 until 2025, and potentially until 2030 based on SB 8. Also, the City Council adopted Resolution No. 8082 on May 19, 2020, suspending the competitive evaluation and selection system contained in Municipal Code 19.04.040 for the duration of the state's applicable legislation.

Required by voter initiatives, the RDA determines which projects may move through the development process to receive building permits. Projects (involving more than four units) compete against each other for an allocation of housing units from the pool of 400 dwelling units allowed each year within the city limits and 150 utility connections permitted in the SOI. The City Council makes allocations four times each year, 117 dwelling unit allocations in each of the first three quarters and then the remainder of dwelling

[13] HCD Updated Streamlined Ministerial Approval Process: https://www.hcd.ca.gov/policy-research/docs/sb-35-guidelines-update-final.pdf

units in the fourth quarter. Staff assists applicants in preparing applications. Unused dwelling unit allocations cannot be carried forward into the next year. Moreover, a project must obtain at least ninety points in order to be eligible to receive an allocation award.

Admittedly, it is a procedure that adds time to the total development approval process by requiring that homebuilders first receive an allocation before proceeding with building permits. Once entitlements are granted, the RDA process takes approximately 60 calendar days. However, this typically occurs when the developer is completing final engineering, completing the final map, finalizing the home designs (after selecting a home builder), and processing building permits. Therefore the projects are not held in hiatus when they are going through the RDA process and there typically is no significant time loss. Furthermore, the RDA application fee is $2,828 per development application.

The City's RDA system is not anticipated to create significant barriers to the approval of affordable housing developments. In fact, the City currently encourages the construction of affordable and senior housing units by awarding up to 20 points for providing such housing. (This is ten points more than the original points system permitted.) Specifically, two points per unit are awarded for projects with 15 percent of dwelling units restricted for very low- and low-income residents and up to six points are given to projects with 90 percent or more of the dwelling units restricted for seniors. While low-income or senior housing developments may not qualify for the maximum points in all rating categories, the City believes that most such projects will score high enough in most of the rating categories to be more than competitive with market-rate housing proposals. The City can address the cost implications of location and design factors included in the evaluation system through other regulatory incentives (such as density bonuses with reductions in certain development standards) and stabilized fees via Development Agreements with affordable housing developers. In addition, a substantial percentage of affordable housing is anticipated to be provided in mixed-income projects in which the majority of dwelling units are market rate. Such projects will have a greater capacity to absorb marginal increases in costs from the application of the City's RDA system.

4.1.5.5 Socioeconomic Study and Cost Benefit Analysis

This requirement was added with the passage of Measure U in 1997. The Growth Management Element of the General Plan states that any development project proposal requiring a General Plan Amendment, Zoning Amendment, Subdivision Map, Specific Plan, CUP approval, or with a building or development area exceeding a cumulative total of 5,000 square feet shall submit a socioeconomic study and cost-benefit analysis (SCBS; see Section 4.1.1.5). However, it was decided that it was not the intent of the Growth Management Element to evaluate a single-family residence on an existing lot of record that is over 5,000 square feet in area.[14] This requirement is not discriminatory as it applies to all development projects—residential and nonresidential, single-family as well as multi-family units.

Projects must submit additional information, including absorption schedule or rate, proposed assessed value, and proposed public improvements. The review is conducted by City staff using a standard checklist and a spreadsheet-based model, and the cost is $3,265 per project (regardless of project size or number

[14] Reference from 5th Cycle Housing Element update, Email exchange with Jeff Shaw, City of Redlands Community Development Director, 3/12/2008.

of housing units). The average single-family project is about 50 units, and the average multi-family project is 90 units, so this would come out to $65 and $36 per unit, respectively. Thus, the monetary cost of this requirement is quite low. City staff prepares the socioeconomic study and cost-benefit analysis that is reviewed by the Planning Commission/City Council along with the Initial Study (per CEQA).

The study requires the evaluation of how the development project in question will affect:

- **Agricultural/Citrus Removal**: will the project affect agricultural resources or operations (e.g., impacts to soils or farmlands, or impacts from incompatible land uses)? Will the project remove active citrus groves—a hallmark of the city—from production?
- **Wildlife Habitat**: will the project eliminate or have a negative impact on wildlife corridors? Will it tend to urbanize open space, impacting preservation and conservation of natural resources? Will it interfere with the use of recognized trails used by joggers, hikers, equestrians or bicyclists? Will it eliminate, reduce, or have any negative impact on wildlife habitat areas including fringe or buffer areas?
- **Traffic**: will the project result in increased vehicle trips or congestion? Will it create additional traffic so as to be in conflict with the policies of the General Plan? Will it impact the livability of a residential neighborhood on streets which, due to design or terrain features, street side development, or other factors, have greater than usual sensitivity to increased traffic? Will it create additional traffic so as to increase the level of service on roadways that are adjacent to or in the vicinity of the project?
- **Fire and Paramedic Services**: will the project require fire and paramedic services that are beyond the current capabilities of the Fire Department? Will it result in an increase in response time for essential fire or paramedic services to the remainder of the community? Will it result in the need for additional fire or paramedic facilities or equipment?
- **Police Services**: will the project require police services that are beyond the current capabilities of the Police Department? Will it result in an increase in response time for essential police services to the remainder of the community? Will it create a need for additional police facilities or equipment? Will it increase crime as a result of the type of business?
- **Downtown Impacts**: will the project result in a reduction of the number or types of businesses located in the downtown? Will it cause an unfair or unreasonable competitive disadvantage to existing businesses downtown? Will it create vacant buildings and the potential for blight? Will it cause an unreasonable increase in traffic downtown? Will it adversely affect downtown businesses?
- **Residential Design**: will the project conflict with existing codes and/or standards? Will it meet minimum point standards of the Residential Development Allocation process?
- **Cultural Facilities**: will the project impact a historic residential structure, neighborhood, or district? Will it impact a historic commercial structure or district? Will it impact cultural facilities such as the Smiley Library, Redlands Bowl, Lincoln Shrine, Joslyn Center, Community Center, etc.?

Will it have the potential to cause a physical change that would affect unique ethnic cultural values? Will it have the potential to disturb, impact or restrict religious or sacred facilities or uses?

- **Park and Recreational Facilities**: will the project result in the increase use or demand for park facilities or programs (including manpower, facilities and equipment)? Will it result in a ratio of parkland to population that exceeds standards and/or goals established by the General Plan?
- **Land Use Compatibility**: will the project result in land uses that are incompatible or inconsistent with the General Plan? Will it create economic impacts on businesses and small property owners? Will it physically separate or divide an existing community? Will it create job losses in the community? Will it create overcrowding of housing?
- **Schools**: will the project create an overcapacity in schools? Will it create the need for additional school facilities or equipment? Will it result in land uses that are inconsistent or incompatible with existing educational facilities in the community? Will it result in social or academic impacts on students because of school closures?

The findings listed above are rated as having a potentially significant, potentially significant unless mitigation incorporated, less than significant, or no impact. Redlands Municipal Code Chapter 16.02 provides the SCBS requirements, and Section 16.02.040 states, "The approving body for the development proposal shall conduct at least one public hearing at which the public may appear and be heard to consider the socioeconomic cost/benefit study after providing ten (10) days' prior notice, published once in a newspaper of general circulation within the city." In some cases that may not otherwise require a public hearing (such as a simple CRA approval), this provision may trigger a public noticing and hearing requirement for the entire project.

In a basic sense, the requirement for the study tasks Planning staff with performing a quick checklist to verify that, for instance, the parcel(s) in question are not in the habitat area of a protected species or that the developer is prepared to pay impact fees related to police, fire, and schools. In other words, the bulk of the findings simply require that staff check that the project in question adheres to policies in the General Plan and/or Zoning Ordinance—information that otherwise would normally be provided in a staff report; this process standardizes this review to enable those who are interested in the project to view, at a glance, how well the project in question complies with the General Plan and City codes.

Studies are done concurrently with the processing of projects (residential or otherwise), and therefore do not have any impact on a residential project proceeding or the length of processing time (for a lower income multi-family or other type of residential development). Additionally, residential developments generally have a positive socio-economic impact because a sales tax factor is included. Therefore, while there is a direct relationship between the cost of the residential unit and the tax benefit provided, this requirement does not serve to constrain development. Since 1997, hundreds of socioeconomic studies have been performed and no project has been denied because of a study's results. Please see Program 7.4-14 in Chapter 7 for further clarification regarding how the study is used.

4.1.5.6 Impact Fees and Exactions

Fees are collected by the Building Division, Municipal Utilities and Engineering Department through the One-Stop Permit Center, and by the Redlands Unified School District at their offices by appointment. Fees are updated every several years, as needed. Planning application fees and Municipal Utilities and Engineering fees were last updated in August 2018; both are available online on the City's website. Current School District fees, last updated in June 2012, are also available online on the District's website. To obtain Building & Safety Division fees, applicants must call the department or visit the One Stop Permit Center, since fees depend on specific project types. Because current fees are assessed per unit and very low- and low-income units are not exempt, the fees constitute a significant share of the cost of producing housing at market minimum prices. This effect is amplified by Redlands' allocation system, which awards up to 72 points for design and energy efficiency considerations. Developers who want to increase their chances of winning an allocation will include more amenities; these then drive up the cost of their product. This is somewhat offset by provisions that allow 20 points to be awarded for very low- and low-income and senior citizen housing.

Total fees for a single-family home, assuming a 2,200-square-foot home on a 7,200-square-foot lot, in a 6 du/acre tract, add up to approximately $16,641. Total fees for a multi-family home are about $11,638. Total fees for an ADU can range between $5,224 and $6,856.

While these fees may seem high, Redlands is a "full-service" city and therefore charges impact fees to include water, sewer, landfill, public facilities, etc. Conversely, in other cities, certain fees are not paid to the City but rather to a water company, waste disposal company, or other entity that provides a service. Table 5.1-6 shows the fee breakdown. All developers will not be charged all of the fees shown. For example, amending the General Plan or changing the zoning designation of a particular property may not be necessary for many projects. Additionally, Table 4-2 contains planning/processing fees, building and safety fees, and development impact fees, all of which serve distinct and necessary purposes. Furthermore, while fees are generally applied equally within the city, usually the infrastructure costs of extending water lines, sewer lines, streets, etc. are greater for developments on the outskirts versus infill projects. For example, if an infill site that was once retail is being converted into apartments, because the City gives credits for trips previously attributed to the site, the apartment complex developer would have greatly reduced transportation fees. Developers can also receive credits for certain fees if improvements such as roadways, traffic signals, drainage systems are installed as part of the project.

TABLE 4-2: REDLANDS DEVELOPMENT FEES (PER UNIT)

	ADU 700+ sq feet	ADU < 700 sq feet	Single Family	Multi-Family	TOD
Development Impact Fees					
Open Space and Parks	$2,454.85	$1,841.14	$3,959.94	$3,624.62	$2,454.85
Library	$164.02	$123.01	$264.58	$242.18	$164.02
Storm Drain			$700.00	$343.00	$343.00
Public Facilities Fee	$425.55	$319.16	$686.45	$628.33	$425.55
Fire Protection Fee	$357.74	$268.31	$577.08	$528.21	$357.74
Police Facilities Fee	$18.67	$14.00	$30.11	$27.56	$18.66
Transportation Fee	$937.54	$703.16	$1,512.36	$1,048.32	$1,074.63
Sewer Capital Fee	$824.65	$618.49	$3,130.00	$2,295.00	$366.00
Water Capital Fee	$1,146.08	$859.56	$4350.00 - $9431.00 (depending on acreage)	$2,181.00	$1,096.00
Solid Waste Fee	$325.00	$325.00	$650.00	$325.00	
Water Rights	$206.29	$154.72	$783.00 - $1701.00 (depending on acreage)	$397.00	$167.00
DIF Total	**$6,860.39**	**$5,226.55**	**$16,643.52 - $22,642.52**	**$11,640.22**	**$6,467.45**
Building and Safety Fees					
Building Permit	$736				
Building Plan Check	$4,093				
Plumbing	$63.85				
DIF + Building and Safety Total	$11,753.24	$5,226.55	$21,536.37 - $27,535.37	$11,640.22	$6,467.45
Environmental Review (Negative Declaration)	$392.00				
General Plan Amendment	$3,797.00				
Zone Change	$1,066.00				
New Construction Conditional Use Permit	$1,066.00				
Commission Review and Approval	$12,493.00				
Tentative Tract Map Review	$2,567.00				
Final Tract Map Review	$3,857.00				
Residential Development Allocation	$392.00				
Total (with GPA and Zone Change)	**$11,753.24**	**$5,226.55**	**$47,166.37 - $53,165.37**	**$37,270.22**	**$32,097.45**

Source: City of Redlands Resolution No 7951, 2018. .

Accessory Dwelling Unit Development Impact Fee Memorandum, 2018

In calculating the fees in Table 4-2, several assumptions were made. It was assumed that single-family homes are on average 2,200 square feet at a density of 6 dwelling units per acre. Similarly, the following assumptions were made for multi-family housing scenarios: townhouses are 1,200 square feet at 10 units/acre, multi- family units of 1,000 square feet are at 20 units/acre, and multi-family units of 800 square feet are at 30 units/acre. The average project size for these developments was assumed to be 50 dwelling units for single-family homes, 60 dwelling units for townhouses, 75 dwelling units for multi-family units at 20 units/acre, and 90 dwelling units at 30 units/acre. For sewer and water frontage fees, it was assumed that frontage for a single-family home or a townhouse is 50 feet and frontage for a multi-family home is 30 feet. Sewer frontage fees are $30/foot across the board, and water frontage fees are $30/foot for 8-inch pipes and an average of $46/foot for 12-inch pipes.

The City recognizes that development fees, although necessary to pay for facilities and services required by new development, add significantly to the cost of housing and affect the feasibility of constructing affordable housing. For this reason, to mitigate this constraint, the City has used, and will continue to use, grant funds to pay for development fees if necessary, to maintain the financial feasibility of an affordable housing development proposal.

4.1.6 Constraints to Housing for Special Needs Groups

Single-family homes, which comprise three-quarters of the housing stock in Redlands, are often too expensive for low-income persons and others with special needs. Therefore, it is necessary for the City to establish policies and processes that facilitate other housing types. This section addresses policy constraints and opportunities that affect special needs groups, including seniors, people with disabilities, the homeless, large families, female-headed households and low-income individuals and families.

As described in the zoning section earlier in this chapter, the City has several stipulations within its policies to encourage alternative housing types.

4.1.6.1 Emergency Shelters, Transitional Housing, and Supportive Housing

In January 2008, SB 2 went into effect, requiring that every jurisdiction in the state identify one or more zoning districts that allow emergency shelters and that transitional housing and supportive housing be treated as any other residential use, subject only to those restrictions on residential uses contained in the same type of structure. The law also requires that the identified zones contain sufficient capacity to provide shelter for homeless persons that have unmet housing needs. On October 1, 2013, City Council adopted Resolution No. 7322, which permits emergency shelters in the SC (Service Commercial) District of the Downtown Specific Plan by right and establishes development standards for emergency shelters. The City has 38.1 acres of land in the SC district and a current unsheltered homeless population of 141. The 38.1 acres is more than sufficient to fulfill the need for emergency shelters for the City's unsheltered homeless population. The City continues to permit transitional and supportive housing by right in all zones that allow residential uses, and projects are not subject to any restrictions not imposed on similar residential uses in the same zone. Program 1.2-3 will ensure the City is compliant with supportive housing regulations pursuant to Government Code Section 65651.

4.1.6.2 Single-Room Occupancy (SRO) Units

SROs represent another affordable housing alternative. City policies regulate the location of SRO units (they are only permitted in the R-2 Multiple Family Residential District with a conditional use permit). However, programs in this Housing Element seek to clarify the definition (Program 7.1-1) and create standards for SROs (Program 7.1-2). In general, the City views SROs as single-room apartments without full kitchen facilities (although often they have a microwave in each room and/or shared kitchen facilities). Furthermore, SROs are exempted from the city's annual 400 dwelling unit cap imposed by Measure U, and therefore may be used to fulfill regional housing needs over this limit. The City initiated the process of considering appropriate zoning districts for SROs and developing criteria for the review of projects. Staff held one workshop with the Planning Commission and had begun preparing a draft ordinance for their review. Staffing constraints have since stymied progress on the SRO Ordinance and the City will maintain this program in this current policy cycle.

4.1.6.3 Manufactured Housing and Mobile Homes

Municipal Code Chapter 18.140 regulates the location of manufactured housing and mobile homes. Manufactured homes and mobile homes are considered single-family homes and therefore are permitted in all residential zones, as long as they comply with the density and other requirements within that zone. Mobile home parks, developments designed and constructed as a single land use complex, are subject to CUPs. The City believes that mobile homes are an important source of affordable housing and therefore mandates rent control in several of the larger complexes (Lugonia Fountains Mobile Home Park, Orange Grove Mobile Estates, and Sylvan Mobile Estates). The City's rent control policy is detailed in Municipal Code Chapter 5.48, Rent Stabilization for Mobile Home Parks and ties rent increases to the Consumer Price Index (CPI).

4.1.6.4 Constraints to Housing for Large Households and Female-Headed Households

Large households and female-headed households may require more traditional housing types; the SROs, mobile homes and shelters described above are not well suited for families. In 2011, approximately 7 percent of households in Redlands were female-headed households and 11 percent were large households (defined as five or more persons per household). These populations are described in more detail in Chapter 2.

Multi-family housing, a more affordable housing option, is permitted in the R-2, R-2-2000, and R-3 Multiple Family Residential as well as Administrative Professional, Town Center, Town Center- Historic, and Service Commercial districts and some nonresidential zones adjacent to these districts. Multi-family housing is also permitted in the C-3 and C-4 commercial districts, but is constrained by the requirement for a conditional use permit. Although the zoning code does not restrict the number of bedrooms per unit, the market often does.

Furthermore, of the total existing housing stock in Redlands, over half is made up of three and four-bedroom units. Additionally, overcrowding does not appear to be a substantial problem in Redlands; according to the 2019 American Community Survey, 5.1 percent of households were considered overcrowded (defined as more than one occupant per room). Program 7.3-8 has been added to study

overcrowding conditions in Redlands in more detail, as well as the inventory and availability of large (3+ bedroom) units, and make further recommendations to the City Council based on the findings.

4.1.6.5 Constraints to Housing for Persons with Disabilities

As noted in the Special Needs Section (Section 2.9.3) of the Housing Element, persons with disabilities have a number of housing needs related to accessibility of dwelling units; access to transportation, employment, and commercial services; and alternative living arrangements that include on-site or nearby supportive living services.

The City ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal (Americans with Disabilities Act) requirements for accessibility. The City also permits educational, residential, health care, and other supportive services (defined as institutional services in the zoning code) of the type that could benefit persons with disabilities in residential zones. Sites zoned for multi-family use, administrative professional, and C-3 and C-4 Commercial zones, which all permit mixed-use developments, are located along arterial streets and transportation corridors to facilitate access and accessibility for persons with disabilities.

Seniors-only housing currently exists in Redlands and provides many of the features that meet the needs of persons with disabilities. The City's current development standards permitting mixed-use developments will allow a wide variety of housing types that could meet the needs of, and provide accessibility to services and transportation to, individuals with disabilities.

Group Homes – 6 or fewer people

The State of California has removed City discretion for review of small group home projects (six or fewer residents). The City does not impose additional zoning, building code, or permitting procedures other than those allowed by state law. There are no City-initiated constraints on housing for persons with disabilities.

The City's Municipal Code permits group homes of 6 or fewer people in any residential zone; however, the code implies that group homes must be licensed by the state. To prevent unnecessary constraints on group homes and to improve housing choice within the community, the City has included Program 1.2-5 that would clarify that a group home of 6 or fewer people may be permitted in any residential zone regardless of state licensing.

Group Homes – 7 or more people

The City's Municipal Code identifies group homes of 7 or more people as being permitted in multi-family and agricultural zones with the approval of a CUP. This is inconsistent with other similar uses and present a constraint to providing group homes that serve people with disabilities or who otherwise require assistance which subsequently leads to reduced housing choice. With a CUP, the certainty of approval is limited. CUPs require a public hearing and notices mailed to all property owners within 300 feet of the proposed group home. In some cases, the potential exists for neighborhood organization against the application and NIMBY-like behavior. The City has included Program 1.2-5 to address these constraints on group homes and will amend the Municipal Code to permit group homes in all residential zones.

In light of current planning policies and zoning regulations, the City believes that it has mitigated any potential constraints to the availability of housing for persons with disabilities.

Procedures for Ensuring Reasonable Accommodations

The City of Redlands has established procedures to ensure that reasonable accommodations are made for persons with disabilities. Any person with a disability may submit an application for reasonable accommodation or variance from the requirements of City zoning or building codes by submitting an application to the city's Development Services Director who may deny, approve or conditionally approve the request or pass the request along to a designated city committee (Ord. 2656 § 1, 2007). The City provides assistance to applicants who need help completing the application. A notice of the filing of the application is sent to owners of all properties within 300 feet of the property that is the subject of the application. The notice contains information about the nature of the accommodation request and provides instructions for notification of any decisions that are made or hearings scheduled regarding the application. The Development Services Director or the committee acting in the capacity of the Director makes the following findings:

- The person who will use the subject property is protected under the fair housing laws;
- The requested exception to the zoning code, law, regulation, procedure or policy is necessary to make specific housing available to persons occupying the subject property;
- The requested accommodation will not impose an undue financial or administrative burden on the City; and
- The requested accommodation will not require a fundamental alteration of the city's zoning or building laws, policies and/or procedures.

In practice, the requirement to notify property owners within 300 feet does not slow down requests. There is no cost to submit an application for reasonable accommodations; the only cost is a building permit (for a small addition to a home, a permit costs less than $500). The Zoning Ordinance establishes a time frame of 30 days to make a decision on an application and the notification of neighbors within 300 feet is handled within this time frame.

Typically, smaller-scale ADA retrofit requests are processed over the counter. A request for a ramp to accommodate a wheelchair takes approximately two to three weeks, while a bathroom modification only takes two to three days. Building permit fees for these types of procedures are less than 100 dollars for bathroom modifications and approximately 30 dollars for a wheelchair ramp.

Efforts to Remove Regulatory Constraints for Persons with Disabilities

The City allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with ADA requirements. Such retrofitting is permitted under Chapter 11 of the 1998 version of the California Code. The City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint. The City's zoning code has been reviewed for Chapter 11 compliance and was found to be compliant.

Information Regarding Accommodation for Zoning, Permit Processing, and Building Codes

The City implements and enforces the ADA and applicable California law regarding access and accommodations for persons with disabilities. The City provides information to applicants or those inquiring of City regulations regarding accommodations in zoning, permit processes, and application of building codes for persons with disabilities.

Zoning and Other Land Use Regulations

A comprehensive review of the City's zoning laws, policies, and practices for compliance with fair housing law has been conducted and is included in the Affirmatively Fair Housing Chapter of the Housing Element. The City has not identified any zoning or other land use regulatory practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals. Examples of the City of Redlands General Plan: Housing Element ways in which the City facilitates housing for persons with disabilities through its regulatory and permitting processes are:

- The City has no authority to approve or deny state-licensed group homes of six or fewer people in zones allowing residential uses, except for compliance with building code requirements, which are governed by the State of California. Similar homes serving seven or more persons are only permitted in the Multiple-Family Residential and Agricultural zones, subject to a conditional use permit. However, Program 7.1-1 in Chapter 5 calls for a thorough evaluation of where such homes are most appropriate. For example, because individuals living in group homes often rely on transit to access social services, it may make more sense to allow group homes in downtown or in other high density or mixed-use areas.
- The City permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of such uses in any part of the City. The Livable Community Element of the General Plan does not restrict the siting of special needs housing.

Permits and Processing

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City's requirements for building permits and inspections are the same as for other residential projects and are fairly simple and straightforward. City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

A significant number of group homes operate in the City of Redlands. As discussed above, the City allows group homes of six or fewer persons by right, as required by state law. No conditional use permit or other special permitting requirements apply to such homes.

The City does not impose special occupancy permit requirements for the establishment or retrofitting of structures for residential use by persons with disabilities. If structural improvements are required for a group home, a building permit is required. If a new structure were proposed for a group home use for

more than six persons, design review would be required as for any other new residential use with five or more units. The hearing process is the same for group homes and special needs housing for persons with disabilities as for other residential projects of five or more units. The Planning Commission examines permitted uses, architecture, landscaping, and site design. To the City's knowledge, its design review process has not been used to deny or substantially modify a housing project for persons with disabilities or otherwise. Furthermore, no reductions in density have been required because of design review.

The City's zoning and permit processes also allow for on-site supportive services, with no additional special conditions. The City's permit process allows conversion of residential structures to include these supportive services as accessory to the primary residential use.

Building Codes

The City provides reasonable accommodation for persons with disabilities in the enforcement of building codes and issuance of building permits through its flexible approaches to retrofitting or converting existing buildings and construction of new buildings that meet the shelter needs of persons with disabilities. The City of Redlands has adopted and implements the 2019 California Uniform Building Code..

4.1.7 Development Densities below those Anticipated in the RHNA

As seen in the 5th Cycle, sites identified in the RHNA were either not developed with residential uses or were developed at lower densities. For the 6th Cycle RHNA, the City is implementing a 20 percent buffer when planning for residential capacity. This 20 percent additional capacity addresses the possibility that some sites may not develop as anticipated. Should that occur, the City would still be well within its ability to accommodate its RHNA obligation before needing to identify and rezone additional land. Additionally, the City has weighted its 20 percent toward the very low and low income categories as this unit classification is generally the most difficult to see to fruition.

In November 2021, the City Council made findings to exempt three different projects in the downtown from Measure U requirements. Each of these sites are included in the City's RHNA for the 6th Cycle. The total proposed unit count from these projects is 950 units, indicating that interest in developing higher-density housing is gaining traction.

4.1.8 2022 Ballot Measure Amending the Principles of Managed Development of the General Plan

On June 7, 2021, *Redlanders for Responsible Growth Management* filed with the Redlands City Clerk a petition for an initiative measure titled "An Initiative Ordinance of the People of Redlands Amending the Principles of Managed Development of the Redlands General Plan" (Initiative). The initiative is an effort to ensure that future development within the City occurs in a manner that is consistent with the values and standards enacted by the people of Redlands through the establishment of the City's Growth Management System. More specifically, the Initiative would amend various sections of the previously adopted Measure U as follows:

1. Requirements for a socioeconomic analysis and cost benefit study will be modified to include a formula that is applicable to residential components of a project in order to determine costs necessary for inclusion in the cost benefit study.
2. Exempts those properties located within the Transit Village Overlay Zone from vote requirements related to density increases and establishes new height limits and parking requirements for Transit Village areas.
3. Provides certain categories of development from the Principles of Managed Development previously established by Measure U and exemptions for development related to the Metrolink stations and for new developments within the Downtown Specific Plan 45 will be deleted;
4. The City Council's vote requirement related to redesignating or rezoning lands previously designated as Urban Reserve or Urban Reserve (Agriculture) will be amended from a requirement of a 4/5th vote to a 5/5th vote. Measure U's density limitation on lands designated as Urban Reserve would also be deleted.
5. Establishes exemptions for projects which have acquired vested rights in accordance with criteria established by the initiative from the Initiative's requirements. The Initiative further details that actions taken by a developer to expedite a development project due to the pending Initiative will not qualify for exemption from the provisions of the Initiative.
6. Require that any interpretation of the Initiative's provisions shall be done in a manner which most vigorously and effectively accomplishes its purpose and operative provisions.

Preemption by Senate Bill 330 (SB 330) – Housing Crisis Act

The courts use the following four-step test when determining the issue of preemption:

1. Does ordinance/initiative regulate a 'municipal affair'
    a. The regulation of zoning through an initiative directed at changing the City's General Plan is considered a municipal affair
2. Must be an actual conflict between local and state law
    a. The Initiative conflicts with the Act by its imposition of height restrictions, new parking regulations, and the imposition of third-party approvals of certain development proposals by adjacent landowners.
3. The State law must address a matter of 'statewide concern'
    a. The legislature has specifically deemed the provision of adequate housing a matter of statewide concern
4. Must be determined that the initiative is 'reasonably related to…resolution' of the statewide concern and is 'narrowly tailored' to avoid unnecessary interference in local governance
    a. SB 330 is narrowly tailored to the type of land use restrictions which reduce or restrict the development of housing

Based on this four-step test, the Initiative is highly likely to be preempted by SB 330 because it imposes new land use restrictions beyond what was found in the City's General Plan 2035, and those restrictions would have the effect of reducing the development of affordable housing opportunities.

Conflict with SB 330 - Housing Crisis Act and Legal Review Conclusions

Based on analysis considering the sufficiency of the proposed Initiative, the following components of the Initiative may be prohibited by the Housing Crisis Act:

1. Established height restrictions in the Transit Villages
2. Requirement for written agreement from adjacent single-family dwelling owners for buildings with more than two stories
3. Additional parking requirements
4. Revised vote requirement to 5/5th vote for the redesignation or rezoning of land designated as Urban Reserve or Urban Reserve (Agriculture).

Any development policy, standard, or condition that does not comply with the Housing Crisis Act is considered to be void. Therefore, the above-mentioned provisions would likely be deemed void if challenged and if the Initiative passes, as they have been determined to lessen the intensity of housing. Furthermore, the proposed revisions to parking standards under the Initiative would also conflict with the state density bonus law's parking requirements for 1.5 spaces for units with two bedrooms or more, since the Initiative proposes to require two covered parking spaces for two or more bedroom units.

The City's RHNA strategy was developed under the assumption that development would occur at densities up to 27 du/ac and up to 3 stories in height. In the event that the Initiative passes, the Initiative would not have an effect on the City's ability to meet its RHNA obligation.

4.2 NON-GOVERNMENTAL CONSTRAINTS

Market forces and environmental considerations can have a substantial impact on the local economy and housing stock. These forces, such as land and construction costs, availability of financing and local economic conditions are outside the control of government; however, local governments can help to mitigate negative consequences of market forces through programs and policy initiatives.

4.2.1 Environmental Constraints

Fire

In Redlands, the highest wildfire risk areas are in San Timoteo and Live Oak Canyons and their neighboring ridgelines. Prolonged droughts coupled with high winds and dry vegetation during summertime creates the highest fire risk in these areas. Left uncontrolled, these fires have the potential to damage or destroy structures, roadways, and utility systems, and disrupt the economy.

The potential for wildland fires can be considered a constraint to development in this portion of Redlands. Thus, programs have been included in this Housing Element update to direct development away from areas at higher risk of wildland fires and closer to areas less prone to wildfires.

Flood

Flooding has historically been a concern in Redlands, where moderate to heavy storms can overwhelm the area's drainages and intermittent waterways. Redlands is drained by four streams, each of which represents a potential flood hazard at peak flows: the Santa Ana River/Mill Creek, the Mill Creek Zanja (also known as Mission Zanja and Mission Storm Drain), San Timoteo Creek, and Live Oak Creek. The Santa Ana River/Mill Creek and the Mission Zanja pose particular flooding hazards to the Redlands.

In order to combat this significant flood risk, the City has been proactive with its building code. The Redlands Zoning Ordinance implements the policies of the General Plan. It contains provisions to mitigate potential hazards on floodplains. Chapter 18.136 establishes the Floodplain District (FP), which prohibits occupancy or encroachment of any structure or development that would obstruct the natural flow of floodwaters within a designated floodway (like the San Timoteo Creek or Santa Ana River); ensures that developments in the floodplain outside of the floodway remain above the design flood flow elevation; and prevents economic loss of loss of life or property from excessive flooding.

Much of the TVSP area is within a 100-year flood zone. The City's Municipal Code provides standards for building within the floodplain that includes standards for both new and repurposed 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 flood damage is no greater than for dwelling units outside the flood zone.

Thus, compliance with existing building codes would not pose an environmental constraint to housing development.

4.2.2 The Local Housing Market

The value of housing in Redlands has gone up dramatically since 2000. Between 2000 and 2018, median home sales prices in Redlands increased 300 percent. In 2020 the median home sales prices in Redlands were $499,105.[15] Overall, Redlands has the highest median home sales price compared to communities nearby. In 2020, the average price of a 3-bedroom home is approximately 2.25 times more expensive than in 2003.

According to the City's Annual Progress Reports (APRs) the vast majority of housing produced in the City in recent years has been above moderate-income housing. While the City has little control over market perceptions and orientation, it can affect how that orientation is translated into housing products through its efforts to encourage the construction of affordable housing and to provide a regulatory climate to support that effort.

15 https://www.zillow.com/redlands-ca/home-values/)

TABLE 4-3: MEDIAN HOME SALE PRICES IN REDLANDS AND NEARBY COMMUNITIES

City	2000	2012	2020
San Bernardino	$94,300	$119,536	$324,881
Highland	$122,200	$180,000	$365,250
Redlands	$152,200	$241,898	$456,332
Yucaipa	$116,400	$190,000	$404,175
Loma Linda	$151,300	$191,000	$450,890

Source: DQNews.com; 2013 CityData; Zillow 2020.

TABLE 4-4: REDLANDS MEDIAN HOME SALES, 2003, 2007, 2012, 2020

Number of Beds	Year			
	2003	2007	2012	2020
Condominiums				
1	$100,000	$160,000	$55,000	$139,000
2	$249,500	$255,500	$97,000	$195,000
3	$225,000	$290,000	$130,000	$305,000
Single Family Homes				
1	$187,000	$382,500	$125,750	-
2	$153,000	$325,000	$165,250	$345,000
3	$220,000	$380,000	$200,000	$499,000
4	$207,000	$431,750	$280,000	$639,000
5	$610,000	$635,000	$401,000	$942,500

Sources: First American Real Estate Solutions (from County Assessor Data); HR&A, Inc; DQNews.com, 2013; Zillow 2020.

4.2.2.1 Land Costs

Land costs are one of the major components of housing development costs. Land prices vary to such an extent that it is difficult to give average prices within small geographic regions. Factors affecting the costs of land include overall availability within a given subregion; environmental site conditions and constraints; public service and infrastructure availability; aesthetic considerations such as views, terrain, and vegetation; the proximity to urban areas; and parcel size.

Rising costs of land are often related to the limited availability of buildable land. In San Bernardino County, which has large expanses of buildable land, this has not historically been considered a problem. Recent sales data indicates that in Redlands the price per square foot of raw land ranges from $0.15 in rural, hillside areas of the City to $25.25 in the downtown area.[16]

16 (www.zillow.com Accessed April 15, 2021)

4.2.2.2 Construction Costs

The cost of construction depends primarily on the cost of materials and labor, which are influenced by market demand. The cost of construction will also depend on the type of unit being built and on the quality of product being produced. The cost of labor is based on a number of factors, including housing demand, the number of contractors in the area, and the unionization of workers.

The construction cost of housing affects the affordability of new housing and may be considered a constraint to affordable housing in San Bernardino County. A reduction in construction costs can be brought about in several ways. A reduction in amenities and quality of building materials in new homes (still above the minimum acceptability for health, safety, and adequate performance) may result in lower sales prices. State housing law provides that local building departments can authorize the use of materials and construction methods if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the applicable building codes.

In addition, prefabricated, factory-built housing may provide lower-priced products by reducing labor and material costs. As the number of units built at once increases, savings in construction costs over the entire development are generally realized as a result of an economy of scale, particularly when combined with density bonus provisions.

Using current pricing sources, the average costs for a newly constructed 2,000-square-foot single-family home (not including land) in the Redlands region would cost between $228,000 and $338,000. At the time of the writing of this Housing Element update, materials costs are increasing, namely lumber prices. Lumber prices have risen more than 250 percent in the last year and the National Association of Homebuilders noted the increases added more than $24,000 to the price of the average single-family home.[17] This price increase is a result of limited domestic supply because of the COVID-19 pandemic. Until the domestic lumber supply can catch up to the demand, prices will remain high and home builders will likely continue to pass the cost to homebuyers.

4.2.2.3 Interest Costs and Availability of Financing

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Jurisdictions can, however, offer interest rate write-downs to extend home purchase opportunities to lower-income households. In addition, government-insured loan programs may be available to reduce mortgage down-payment requirements.

It can be difficult for very low-, low-, and moderate-income first-time homebuyers to acquire sufficient savings and income to pay for a down payment, closing costs, monthly mortgage, and tax and insurance payments.

4.2.2.4 Consumer Interest Rates

Even small increases to home loan interest rates can substantially affect monthly housing costs and reduce affordability to low- and moderate-income households. Table 4-5 shows how changes in interest rates

17 https://markets.businessinsider.com/news/stocks/lumber-prices-hit-record-highs-soaring-past-year-2021-4-1030299977

affect borrowing costs. For each one percentage point increase in the interest rate, borrowing costs increase by 6 to 7 percent for a 15-year home loan and 20 percent if the increase is from five to eight percentage points. For a 30-year loan, the effects are even more pronounced: each one percentage point increases the monthly payment 10 to 11 percent—nearly 37 percent if the increase is from five to eight percentage points.

TABLE 4-5: IMPACT OF INTEREST RATES ON MONTHLY MORTGAGE PAYMENTS

	Monthly Payment on a 15-Year Loan				Monthly Payment on a 30-Year Loan			
	5%	6%	7%	8%	5%	6%	7%	8%
$100,000	$791	$844	$899	$956	$537	$600	$665	$734
$150,000	$1,187	$1,266	$1,349	$1,434	$806	$900	$998	$1,101
$200,000	$1,582	$1,688	$1,798	$1,912	$1,074	$1,200	$1,330	$1,468
$250,000	$1,978	$2,110	$2,248	$2,390	$1,343	$1,500	$1,663	$1,835
$300,000	$2,373	$2,532	$2,697	$2,868	$1,611	$1,800	$1,995	$2,202
$350,000	$2,769	$2,954	$3,147	$3,346	$1,880	$2,100	$2,328	$2,569
$400,000	$3,164	$3,376	$3,596	$3,824	$2,148	$2,400	$2,660	$2,936
$450,000	$3,560	$3,798	$4,046	$4,302	$2,417	$2,700	$2,993	$3,303
$500,000	$3,955	$4,220	$4,495	$4,780	$2,685	$3,000	$3,325	$3,670

Source: City of Redlands 5th Cycle Housing Element.

Many consumers mitigate the impact of rising interest rates by purchasing adjustable rate mortgages that typically begin with substantially lower introductory rates. Adjustable rate mortgages allow a borrower's interest cost, and monthly payment, to rise or fall with market rates. In a rising interest rate climate, adjustable rate mortgages can offer substantial short-term savings over a fixed-rate loan. In a declining or highly volatile interest rate climate, adjustable rate mortgages can lead to higher short-term costs, as demonstrated in 2007. Presently, interest rates are at near historic lows which has increased the purchasing power of homebuyers; however this advantage has been offset by the increasing cost of new housing and has fanned the rapid increase of existing home prices.

4.2.2.5 Developer Interest Rates

Higher interest rates increase the cost of doing business for developers in two ways: (1) construction costs rise (most residential development is financed, at least in part, through construction loans), and (2) permanent borrowing costs increase. Table 4-6 shows the impact of changes in loan rates on the monthly rent for hypothetical apartment projects that are privately financed and that receive state and/or federal funds. Three per-unit project costs are assumed: (1) a small apartment complex with minimal amenities that costs $80,000 per unit to construct, (2) a medium quality apartment complex with average amenities that costs $90,000 per unit to construct, and (3) a luxury apartment complex that costs $100,000 per unit to construct. In each case the properties include a mix of one- and two-bedroom apartments. These examples assume that 75 percent of the project is financed at a commercial lending rate for a term of 15 years.

Therefore, a three percentage point increase in interest rates for permanent financing, from 6 percent to 9 percent, will increase the per unit borrowing cost by 20 percent and the overall per unit cost (accounting for operation and maintenance expenses) by about 10 percent.

TABLE 4-6: IMPACT OF INTEREST RATES ON COMMERCIAL BORROWING COSTS

Per Unit Loan Amount (75% Financed)	Interest Rates				
	6%	7%	8%	9%	10%
$60,000	$506	$539	$574	$608	$645
$67,500	$570	$607	$645	$684	$726
$75,000	$633	$674	$717	$761	$806

Source: City of Redlands 5th Cycle Housing Element.

4.2.2.6 Financing Availability and Distribution

Given the increase in defaults on mortgages in Redlands and elsewhere in the region that resulted from the 2008 financial crisis, as well as the subsequent reaction from the Federal Reserve, the ability to borrow money has become more difficult. According to the 5th Cycle Housing Element, the most severe lending problem appeared to be with long-time homeowners in North Redlands who have substantial deferred maintenance on their properties. These owners often have trouble accessing capital to make improvements on their homes. Home Mortgage Disclosure Act data from 2019 supports this assertion as a continuing condition. The rate of approval for home improvement loans in North Redlands was 20 percent lower compared with approval rates for home purchase loans. In census tract 78 (Lugonia Colony area), no home improvement loans were originated in 2019.[18]

As for new homebuyers, there does not seem to be a problem obtaining loans from the bank, as long as the borrower has good credit. The Home Mortgage Disclosure Act data confirms that borrowing rates are fairly consistent throughout the city. On average, 72 percent of home purchase loans were approved in the city, up 2 percent from 2013; the rate in North Redlands is lower at 68.5 percent, although one census tract in the neighborhood reports approval rates at 67 percent, the same as 2013. With the recent sub-prime mortgage crisis, lenders may be unwilling or not permitted under new standards to offer mortgages to individuals with low credit ratings. On the other hand, recent cuts to short-term interest rates by the Federal Reserve may lead to a decrease in mortgage rates, encouraging borrowing for mortgages and construction loans. In addition, deferred maintenance has become an issue with resales as well, since homes being purchased must be up to code.

18 Federal Financial Institutions Examination Council. Home Mortgage Disclosure Act. 2019 Mortgage Application and Approval Data by Census Tract.

5 QUANTIFIED OBJECTIVES, HOUSING GOALS, POLICIES, AND PROGRAMS

The goals, policies, and programs delineated in this chapter serve to support the State of California's overarching aim of providing "decent housing and a suitable living environment for every Californian…is a priority of the highest order" (Government Code Section 65580). This Housing Element updates the prior list of programs by removing those that no longer serve the mission of providing housing for all, and includes new programs aimed at implementing meaningful and impactful change. Specifically, several of these new policies are tailored to the Transit Villages Specific Plan (TVSP) that the City is currently developing.

According to Government Code Section 65583 (b), local governments' housing elements are required to establish quantified objectives for the maximum number of housing units which can be constructed, rehabilitated, and conserved over a five-year time frame. The objective for units to be conserved should include a subtotal for the number of at-risk units developed pursuant to Government Code Section 65583 (a)(9)(A).

Table 5-1 presents the Housing Element's quantified housing objectives pursuant to Government Code Section 65583 (a)(9)(A).

TABLE 5-1: QUANTIFIED OBJECTIVES, 2021-2029

Category	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Above-Moderate Income	Total Objective
New Construction	160	160	320	480	480	1,600
Rehabilitation	20	20	100	0	0	140
Preservation of Units at Risk	30	30	0	0	0	60

Note: Populated figures are estimated averages for each category.

The housing goals, policies, and programs that follow were created for the purpose of meeting the housing needs of the citizens of Redlands throughout the 2021-2029 planning period.

- **Goals** are the results that the City desires to achieve over the housing planning period. They are general expressions of values and aspirational outcomes and as a result, may not be fully attained. The goals are the foundation of the policies and actions to be implemented over the housing planning period.
- **Policies** are specific statements that guide decision-making. Policies serve as the fundamental tenets that support the overarching goal, and are statements of broad direction, philosophy, or standards to be achieved.
- **Programs** are the core of the City's housing strategy, translating goals and policies into actions. These include ongoing programs, Zoning Ordinance changes, procedural changes, and other

actions that implement the housing policies and help the City achieve its goals. Each program identifies the responsible agency, funding source, time frame for implementation, and specific objectives.

5.1 GOAL: HOUSING DEVELOPMENT AND VARIETY

A housing stock comprising of a variety of housing and tenancy types at a range of prices, within close proximity to services and opportunity, which meets the varied needs of existing and future City residents, who represent a full spectrum of age, income, and other demographic characteristics.

5.1.1 Policies

1.1 Provide adequate capacity to meet the Sites Inventory for Regional Housing Needs Assessment (RHNA).

1.2 Increase capacity and access to opportunities and services through the adoption of the Transit Villages Specific Plan.

1.3 Provide housing capacity near public services.

1.4 Realize capacity potential through minimum densities.

1.5 Maintain an up-to-date residential sites inventory and provide to interested developers with information on available development incentives.

1.6 Support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.

1.7 Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.

1.8 Incentivize the development of Accessory Dwelling Units as a means of providing a diversity in housing types in all areas within the City.

1.9 Incentivize efficient buildings and conservation.

5.2 GOAL: REMOVAL OF CONSTRAINTS TO THE PRODUCTION OF HOUSING

Removal of governmental policies or regulations that unnecessarily constrain the development, improvement, or conservation of market-rate or affordable housing. Also includes the sharing of information related to environmental and market constraints to identify challenges early in the development process.

5.2.1 Policies

2.1 Periodically review and update the Zoning Ordinance to stay abreast of updates to State law to reduce constraints to emergency shelters, low barrier navigation centers, supportive housing, and group homes.

2.2 Periodically review and update the Zoning Ordinance to address constraints on housing yield posed by development standards.

2.3 Establish objective design standards to facilitate streamlined project permitting.

2.4 Evaluate fee structures and permit costs to incentivize housing production.

2.5 Allow by-right approval of projects containing 20% or more units affordable to lower-income households.

2.6 Facilitate the production of mixed-use housing by clarifying development standards and evaluating the public review process for mixed-use development.

2.7 Continue to provide pre-application services and assistance to developers to identify non-governmental constraints early in the development process.

5.3 GOAL: PRIORITIZATION OF HOUSING FOR LOWER AND MODERATE INCOME AND SPECIAL NEEDS POPULATIONS

Adequate provision of housing for lower and moderate income and special needs populations requires special attention and prioritization from identifying sites, facilitating the development process, and maintaining and preserving housing. Includes services directed at homelessness and education for property owners and landlords.

5.3.1 Policies

3.1 Incentivize development of affordable housing by leveraging density bonuses.

3.2 Prevent displacement through the provision of replacement units at the same income level.

3.3 Prioritize water and wastewater service for affordable housing developments.

3.4 Working with the Housing Authority of San Bernardino County, provide outreach and education for tenants and landlords.

3.5 Working with the Housing Authority of San Bernardino County, actively address homelessness through coordination with service providers.

3.6 Examine an inclusionary housing ordinance as a means of providing affordable housing.

3.7 Prioritize surplus lands for affordable housing development.

5.4 GOAL: INCENTIVIZE AND PRESERVE HOUSING

Programs that conserve housing currently available and affordable to lower-income households, and programs that prevent or reverse deterioration in areas exhibiting symptoms of physical decline.

5.4.1 Policies

4.1 Coordinate with the Housing Authority of the County of San Bernardino to monitor, track and encourage preservation of affordable housing at-risk of loss or conversion to market rate housing.

4.2 Connect owners to resources to rehabilitate and improve the condition of existing affordable housing stock.

5.5 GOAL: AFFIRMATIVELY FURTHERING FAIR HOUSING

Promote equal opportunity for all residents to reside in the housing of their choice regardless of their special characteristics as protected under State and Federal fair housing law.

5.5.1 Policies

5.1 Prohibit discrimination in the sale or rental of housing with regard to characteristics protected under State and Federal fair housing laws.

5.2 Encourage the development of residential units that are accessible to disabled persons or are adaptable for conversion to residential use by disabled persons.

5.3 Reasonably accommodate persons with disabilities who seek waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.

5.4 Accommodate emergency shelters, low barrier navigation center, transitional housing, supportive housing, residential care facilities, and community care facilities in compliance with State laws.

5.5 Improve awareness, access, and use of education, training, complaint investigation, mediation services of the fair housing service provider, particularly in areas sensitive to displacement, low-income, racial/ethnic concentration, disability or other fair housing considerations.

5.6 GOAL: VARIED AND ADEQUATE FUNDING SOURCES

Identification of funding streams from a variety of sources to provide financial assistance to service providers and to fund programs.

5.6.1 Policies

6.1 Identify and review opportunities for funding.

6.2 Share funding opportunities with the development community/service providers.

5.7 HOUSING PROGRAMS

TABLE 5-1: PROPOSED PROGRAMS

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
1.1		**RHNA/Community Planning**					
1.1-1	1.1-1	RHNA Rezoning	Within three years of Housing Element adoption, rezone land to provide adequate capacity for at least 4,219 units on suitable sites. - 1,898 very low and low income units - 782 moderate Income units - 1,538 above moderate income units The rezoning program would rezone a minimum of 119 acres and provide for 30 du/ac with a minimum density of 20 du/ac for lower-income sites. Each site will be able to accommodate a minimum of 16 units. The City will incorporate a replacement housing provision for any sites with existing residential use and will permit multifamily uses without discretionary action.	October 2024	- 1,898 very low and low income units - 782 moderate Income units - 1,538 above moderate income units -119 acres rezoned	City of Redlands Development Services Department	Staff time
1.1-2	1.1-2	Measure U Analysis	The City will conduct a detailed legal analysis of all	2022	Adopted Resolution by City Council	City of Redlands	City

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			aspects of Measure U to evaluate the consistency of Measure U provisions with State housing laws.		making determinations on Measure U implementation	Development Services Department and City Attorney's Office	
1.1-3	1.1-3	Transit Villages Specific Plan	Adopt the Transit Villages Specific Plan by the end of 2022 to allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. Use the TVSP to facilitate smart-growth planning principles, downtown revitalization, and infill development. The TVSP will allow for residential densities per the 2035 General Plan and 6th Cycle Housing Element and allow multi-family residential uses. TVSP area is a total of 947 acres. Currently 60 acres of vacant land available for mixed-use development within TVSP area.	December 2022	Adopted specific plan	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			Draft TVSP use list allows multiple housing types by-right (Permitted use) including supportive and transitional housing.				
1.1-4	1.1-4	By-Right Approval of Projects with 20 Percent Affordable Units on "Reused" Site	Pursuant to AB 1397, amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower-income households, on sites being used to meet the 6th Cycle RHNA that represent "reuse sites" previously identified in the 4th and 5th Cycles Housing Element, and on sites that are being rezoned to accommodate the lower-income RHNA.	October 2024	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.1-5	1.1-5	No Net Loss Monitoring	Pursuant to SB 166 (No Net Loss), the City will develop a procedure to track: • Unit count and income/affordability assumed on parcels included in the sites inventory. • Actual units constructed and income/affordability when parcels are developed.	Development of the procedure by October 2022, ongoing maintenance thereafter	Adopted code amendments	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			• Net change in capacity and summary of remaining capacity in meeting remaining RHNA.				
1.1-6	1.1-6	Minimum Densities	Amend the Zoning Ordinance to establish minimum densities for residential and mixed-use zones to ensure that residential projects are developed close to their maximum densities (70% of the maximum allowed by base-zoning).	October 2024	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.1-7	1.1-7	Achieving the General Plan Densities	Amend the zoning ordinance to ensure it is consistent with the Redlands 2035 General Plan. Specifically, ensure each implementing zone allows up to the maximum permitted by the General Plan, pursuant to AB 3194.	October 2024	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.1-8	1.1-8	Development on Non-Vacant Sites	Establish an outreach and coordination program through the Economic Development Division to connect developers, builders, and owners of non-vacant sites. Program shall: (1) Emphasize reaching out to owners of on-vacant sites to discuss any interest in	Initiate by October 2022, and maintain throughout planning period on a quarterly basis.	Engage with 10 property owners of high-potential non-vacant sites each year.	City of Redlands Economic Development Division	Staff Time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			redeveloping and available incentives. (2) Marketing and advertising these sites to the development community along with any incentives that might be available. (3) Establish quarterly meetings with developers and builders.				
1.1-9	1.1-9	Lot Consolidation and Small Site Development	The City may consider incentives to achieve orderly development, improve pedestrian activity, and implement the goals, policies, and objectives of the Housing Element. The following incentives may be considered at the discretion of the (Planning Commission/City Council): (1) Parking reduction (2) Alternative parking arrangements (3) Signage bonus. City shall advertise and promote lot consolidation provisions to existing property owners and prospective mixed-use developers.	Develop incentives by October 2022 and adopt Zoning Ordinance Amendment by October 2023	Adopted code amendments	City of Redlands Development Services Department	Staff Time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
1.2		**Removal of Constraints to the Production of Housing**					
1.2-1	1.2-1	Emergency Shelters	Update the zoning ordinance to amend standards for emergency shelters to comply with recent changes to state law (AB 139).	October 2022	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-2	1.2-2	Low Barrier Navigation Centers	Update the zoning ordinance to provide opportunities for Low Barrier Navigation Centers to comply with recent changes to state law (AB 101).	October 2022	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-3	1.2-3	Transitional and Supportive Housing	Update the zoning ordinance to comply with changes to state law regarding Transitional and Supportive Housing, including allowing supportive housing by-right in zones where multifamily and mixed uses are permitted, pursuant to Government Code section 65651. (SB 745 and AB 2162).	October 2022	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-4	1.2-4	SRO Ordinance	Adopt a Single Room Occupancy (SRO) ordinance to provide additional housing opportunity for low- and very low-income households near	October 2022	Adopted code amendments	City of Redlands Developmen	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			the planned Metrolink/Arrow light rail stations.			t Services Department	
1.2-5	1.2-5	Group Homes	Review zoning provisions for large group homes (7+ persons) and implement mitigating strategies to remove potential constraints on the production of large group homes. Ensure zoning standards facilitate approval certainty and objectivity in the development of large group homes. Amend the Zoning Ordinance to allow group homes in all zones that allow residential uses. Amend Zoning Ordinance to clarify group homes/ community care facilities of 6 or fewer people do not need to be licensed by the State.	October 2022	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-6	1.2-6	FAR based development fees	Study and consider FAR based development fees (as opposed to unit based fees) to create financial incentives for the creation of additional units.	June 2025	Adopted code or free schedule amendments	City of Redlands Development Services Department / Finance Department	Staff time
1.2-7	1.2-7	Amend Development Standards	Amend parking requirements, open-space standards, and	December 2023	Adopted code amendments	City of Redlands	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			setbacks for multi-family properties to further incentivize and encourage higher density development.			Development Services Department	
1.2-8	1.2-8	Ballot Measures: SECBS	Ensure that Socio Economic Cost Benefit Studies are reviewed and analyzed in an objective manner. Develop objective standards and thresholds for the SECBS checklist. By October 2024, complete a City-initiated study that evaluates the effectiveness of measures and consider alternative actions if needed.	October 2023	Adopted code amendments or official interpretation	City of Redlands Development Services Department	Staff time
1.2-9	1.2-9	Ballot Measures: Environmental Impacts	Clarify and implement the "no environmental impact" provision of the ballot measures to allow and mitigate potentially significant impacts as allowed by CEQA .	October 2023	Adopted code amendments or official interpretation	City of Redlands Development Services Department	Staff time
1.2-10	1.2-10	Objective Design Standards: SB 330	Pursuant to SB 330, review and revise development standards and design guidelines by the end of 2023 to ensure City requirements are objective, neutral, and feasible. Prior to the adoption of objective standards, City will continue to apply current	December 2023	Adopted code amendments	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			standards in an objective manner.				
1.2-11	1.2-11	Density Bonus Update	Amend the Density Bonus Ordinance to comply with recent changes to state law (AB 2345).	October 2024	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-12	1.2-12	Mixed Uses in Commercial Zones	Amend the City's C-3, C-4, and A-P zones to create objective standards for mixed-uses and facilitate the redevelopment of commercial sites to mixed-use.	October 2024	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-13	1.2-13	Remove CUP Requirement for Multi-Family Developments	Amend the zoning ordinance to remove the conditional use permit requirement for multi-family developments of 35 units or more.	October 2024	Adopted code amendments	City of Redlands Development Services Department	Staff time
1.2-14	1.2-14	Waive preapplication fee for affordable housing projects	Mitigate non-governmental and financial constraints by waiving pre-application meeting fees and providing technical assistance to housing projects that propose to provide below market-rate units. Provide expedited processing for projects that propose low-income, extremely low-	October 2022	Amended fee schedule	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			income, or special needs units.				
1.2-15	1.2-15	Non-governmental constraints. Environmental Information Mapped.	Continue to provide information and maps of known environmental constraints at the planning and zoning counter to provide additional clarity and certainty and mitigate non-governmental constraints for project applicants.	Ongoing	Annually re-examine information and maps of known environmental constraints and update informational materials for the public.	City of Redlands Development Services Department	Staff time
1.2-16	1.2-16	Floodplain Development	Review the City's development standards (such as setbacks, lot dimensions, etc.) within the floodplain to reduce the need for variances for projects needing to elevate structures to meet FEMA floodplain requirements. Current code requires buildings to be sited near the sidewalk for urban development, however this presents challenges with elevating building pads out of the flood zone.	December 2023	Adopted code amendments; adopt and implement Transit Village Specific Plan	City of Redlands Development Services Department	Staff time
1.2-17	1.2-17	Definition of Family	Amend the definition of family to comply with state law.	December 2022	Adopted Code Amendments	City of Redlands Developmen	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
						t Services Department	
1.2-18	1.2-18	Employee and Farmworker Housing	Pursuant to Health and Safety Code section 17021.5, define and permit employee housing in compliance with the Employee Housing Act. Revise zoning to allow farmworker housing in all agricultural zones throughout the City. Pursuant to Health and Safety Code section 17021.6, employee housing for six or fewer employees is treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. Revise zoning to allow employee housing in all applicable zones throughout the City.	December 2022	Adopted Code Amendments	City of Redlands Development Services Department	Staff time
1.2-19	1.2-19	Streamlined Ministerial Approval Permit Procedures	The City will review its approval processes to ensure it accommodates streamlined applications, pursuant to Senate Bill 35.	Ongoing		City of Redlands Development Services Department	Staff Time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
						/ Facilities and Community Services Department	
1.2-20	1.2-20	Extend Affordability Covenant Time Length	The City will extend the affordability covenant time length from 55 years to 99 years		Adopted Code Amendments	City of Redlands Development Services Department / Facilities and Community Services Department	Staff time
1.3		**Prioritization of Housing for Lower and Moderate Income and Special Needs Populations**					
1.3-1	1.3-1	Surplus Lands	Annually review and assess City-owned properties and determine if they are considered "surplus lands" pursuant to the Surplus Lands Act. Dispose of any surplus property pursuant to the act and HCD guidance. City will initiate zone changes as	Annually	Annual report	City of Redlands Development Services Department / Facilities and Community Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			necessary to facilitate housing development.				
1.3-2	1.3-2	Inclusionary Housing Ordinance	Conduct a feasibility study on the financial viability and potential of an inclusionary housing ordinance. If appropriate and financially feasible, adopt an inclusionary ordinance.	October 2023	Draft report and code amendments	City of Redlands Development Services Department	Staff time
1.3-3	1.3-3	Displacement Prevention (SB 330 and AB 1397)	Pursuant to State law, amend the Zoning Ordinance by the end of 2022 to require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in the State Density Bonus Law.	December 2022	No net loss of lower income units	City of Redlands Development Services Department	Staff time
1.3-4	1.3-4	Priority Water and Wastewater Service for Affordable Housing Developments	Adopt written policies and procedures consistent with State law. .	Adopt by October 2022.		City of Redlands Development Services Department / Municipal Utilities and Engineering Department	Staff Time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
1.3-5	1.3-5	Rental Inspection Program / Landlord Registration	The Rental Inspection Program enhances the quality of rental properties and thereby the quality of life for tenants throughout the City and ensures that all rental properties are maintained in accordance with City standards. City inspectors inspect rental properties for exterior code violations and will issue corrective reports to property owners/landlords. Examples of reportable issues include: roof leaks, unsafe fire conditions, unsafe stairs, unmaintained landscaping or parking/driving areas.	Ongoing	Annually updated registry	City of Redlands Facilities and Community Services Department	Staff Time
1.3-6	1.3-6	Outreach and Education	Educate and inform landlords about AFFH through continuation of the Crime Free Program. Provide information and educational materials for Housing Choice Vouchers, foreclosure assistance programs, the state's new source of income protection (SB 329 and SB 222) on the City website and at the public counter.	Initiate by October 2022. Provide materials on an on-going basis. The website will be updated annually.	Updated website and counter materials	City of Redlands Police Department / Facilities and Community Services Department	Staff time
1.3-7	1.3-7	Homeless Support	Administer CDBG funds received from the County to	Ongoing	Allocate between $10,000 to $12,000	City of Redlands	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			service providers including local nonprofits. Prioritize funds that will assist with the development of housing for the unhoused population.		of CDBG funds to provide supportive and transitional housing support to populations in need including the homeless population.	Development Services Department	CDBG
1.3-8	1.3-8	Homeless Assistance Program	Continue the operation of homeless assistance program through the Police Department. Assist in connecting homeless individuals to local service providers, as well as continue to fund for shelter beds with available grant funding and donations.	Ongoing	The city funds 3 shelter beds that are operated by Steps 4 Life through grant funding, as well as annual donation from an anonymous annual donation in the amount of $18,000.	City of Redlands Police Department	General Fund, Donation
1.3-9	1.3-9	Facilitate Tenant Protection Act of 2019 (AB 1482) Compliance	Ensure compliance with new state tenant protection measures, including maximum annual rent increases, just cause evictions, and financial compensation requirements to stabilize residents living in areas at risk of displacement, including the area of high segregation and poverty in downtown Redlands.	Ongoing Post information within 6 months of housing element adoption	Make information about the Facilitate Tenant Protect Act of 2019 available at the planning counter and during outreach events. Refer inquiries to Inland Fair Housing and Mediation Board, the City's contracted fair	City of Redlands Development Services Department	Staff Time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			In coordination with Program 1.5-11, provide information to landlords and tenants regarding tenant protections and post information online and in community centers.		housing service provider.		
1.4		**Incentivize and Preserve Housing**					
1.4-1	1.4-1	Preservation of at risk housing	The City has an inventory of 120 publicly assisted housing units affordable to lower income households. These units are deed restricted for long-term affordability. Between October 15, 2021 and October 2029, 60 publicly assisted units at the Citrus Arms development are on a 5-year contract which has historically been renewed, however are considered at risk of converting to market rate housing. - Monitor Project Status Annually - Ensure property owners comply with extended noticing requirements under state law.	Annually	No net loss of publicly assisted housing units – work with property owners and operators to extend the period of affordability.	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			- Include preservation as an eligible use in notices of funding availability. - Proactively coordinate with qualified entities. -Assist with funding or support funding applications. -Educate, support and assist tenants.				
1.4-2	1.4-2	Rehabilitate and improve condition of existing affordable housing stock	Make available on the City website and at the Planning Department information on programs and resources available to property owners for assistance with home repairs and improvements.	Ongoing	Provide information to assist the rehabilitation low-income homes.	City of Redlands Development Services Department	Staff time
1.5		**Affirmatively Furthering Fair Housing**					
1.5-1	1.5-1	Place Based Improvements	The City applies for and receives an annual allocation of CDBG funds from the County. These funds are used to install and upgrade public facilities (sidewalks, alleyways, ADA accessibility improvements) in lower income neighborhoods or where civic services are offered.	Annually apply for CDBG funds	List of priority capital improvements	City of Redlands Municipal Utilities and Engineering	CDBG

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			Prioritize CDBG funds for the development of low income housing and special needs housing, with place based improvements surrounding those projects.				
1.5-2	1.5-2	Coordinate with Inland Fair Housing and Mediation Board	Continue to utilize the County's contract with the Inland Fair Housing and Mediation Board to provide fair housing services, testing, and resources to residents of Redlands.	Ongoing	Provide fair housing services to 100 residents of Redlands over the 2021-2029 planning period.	City of Redlands Development Services Department	Staff time
1.5-3	1.5-3	Promotion of Fair Housing Information	Publicize Fair Housing Information, including information about tenants' rights, landlord requirements, and recent litigation on the City's website, social media platforms, and through physical promotional material (e.g., flyers, posters).	Ongoing	Clear and easily accessible fair housing resources	City of Redlands Development Services Department	Staff time
1.5-4	1.5-4	Expand fair housing outreach in communities with disproportionate needs	Amend and expand fair housing outreach to facilitate dialogue with communities facing disproportionate needs. Host a community feedback meeting annually to obtain resident feedback on community planning issues,	Ongoing	One fair housing workshop per year	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			fair housing topics, and ongoing City programs.				
1.5-5	1.5-5	Fair Housing Reporting	Acquire and analyze data from Inland Fair Housing and Mediation Board annually to review potential areas of fair housing issues.	Ongoing	Conduct analysis and report results/findings of any potential fair housing issues in Redlands annually	City of Redlands Development Services Department	Staff time
1.5-6	1.5-6	Regional Coordination	Participate in regional efforts and coordination to respond to discrimination and fair housing issues, and monitor progress towards addressing impediments to fair housing choice.	Ongoing		City of Redlands Development Services Department	Staff time
1.5-7	1.5-7	Enforcement of Fair Housing Laws	Accept Fair Housing violation complaints and forward to the Fair Housing and Mediation Board for enforcement.	Ongoing	Track and annually report the number and nature of fair housing questions, complaints and referrals to the service provider.	City of Redlands Development Services Department / Facilities and Community Services	Staff time
1.5-8	1.5-8	Increasing Residential Development and Opportunity in Transit Accessible and Smart Growth Areas	Through the Transit Villages Specific Plan, provide additional capacity for residential development in the City's highest opportunity areas. Implement the TVSP to revitalize the City's downtown	2023	Annual progress report on TVSP implementation.	City of Redlands Development Services Department	SB2 funds, Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			and areas around the train stations, and transform areas with disproportionate needs and environmental risks to areas of high opportunity and wellbeing.				
1.5-9	1.5-9	Mobile Home Park Preservation	Continue to implement the Mobile Home Rent Control ordinance to prevent displacement of lower-income and at risk populations.	Ongoing	Assist 200 mobile home unit owners per year	City of Redlands Development Services Department	Staff time
1.5-10	1.5-10	NOFA/Nonprofit Housing Development	Identify funding from federal, State, and local sources to expand affordable housing opportunities within the City and share these opportunities with local service providers and the development community. Prioritize these opportunities to identified developers of low-income housing and supportive housing.	Identify and share information by October 2022. Provide materials on a quarterly basis.	Updated list of funding resources. Send letters to affordable housing developers twice a year to inform the developers about the City's RHNA inventory.	City of Redlands Development Services Department	Staff time
1.5-11	1.5-11	Provide training for multi-family housing landlords	Continue to provide 2-day Crime-Free Multi-Housing/Rental Property Training to multi-family landlords in the City to educate landlords on a wide range of issues including eviction process, Fair Housing	Ongoing	Minimum of once per year	City of Redlands Police Department	Staff time with volunteer assistance

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			issues, tenant screening, acceptance of HCVs as a legitimate source of income, and others. Ensure that landlords are aware of new source of income discrimination laws.				
1.6		**Accessory Dwelling Units**					
1.6-1	1.6-1	Educational Campaign and Information	Promote information and tools available to facilitate ADU construction. Provide easily accessible information on the City's website, at the zoning counter. Coordinate with SBCTA to utilize regional resources and adopt policies, procedures, and standards consistent with neighboring jurisdictions to streamline ADU applications. Encourage ADU and SB 9 production in southern Redlands and high resource areas.	Identify information resources and tools by October 2022 and provide information on an ongoing basis.	Increase ADU production annually. Revise fee structures to reduce cost for constructing ADUs.	City of Redlands Development Services Department	Staff time
1.6-2	1.6-2	Pre-Approved Plan Sets	Make a variety of example ADU plan sets available to facilitate reduced applicant cost and expedited review for ADUs. Ensure example plans	October 2022	3 example or model ADU plan sets	City of Redlands Development Services Department	Staff time SBCTA REAP funded

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
			provide choices and diversity in size to accommodate a variety of household sizes and types.				ADU program
1.6-3	1.6-3	Updated ADU Regulations to meet state law	Amend the Zoning Ordinance to address multiple recent changes to state law regarding ADUs (including AB 587, AB 671, AB 68, and SB 13). Monitor state law on an ongoing basis and revise the Zoning Ordinance as appropriate.	October 2024	Annual assessment for consistency	City of Redlands Development Services Department	Staff time
1.6-4	1.6-4	ADU Tracking and Monitoring	Annually monitor the development and affordability of ADUs. If trends indicate a potential shortfall in meeting the estimated ADUs in the sites inventory, consider additional efforts to incentivize ADU production and reassess and revise the overall sites strategy for the RHNA within one year through adjusting ADU capacity assumptions with actual permitted units, and/or identifying additional sites to expand site capacity to the extent necessary to accommodate the RHNA.	Ongoing	Annual Progress Report and ADU construction	City of Redlands Development Services Department	Staff time

Index Number	Program Number	Program Title	Program/Action Description	Completion Time Frame	Quantified Objective	Responsible Agency	Financing
1.7		**Efficient Buildings and Conservation**					
1.7-1	1.7-1	Reclaimed Water	Continue to require the installation of reclaimed water infrastructure by new development when feasible.	Ongoing	Approve reclaimed water for 500 units.	City of Redlands Municipal Utilities and Engineering	Staff time
1.7-2	1.7-2	Lighting efficiency	Make available and distribute informational materials during the building permit process about energy-efficient lighting for residential buildings.	Ongoing activity, post information on City website by October 2022	Retrofit lighting efficiency for at least 100 residential units.	City of Redlands Building and Safety Division	Staff time
1.7-3	1.7-3	Pursue Energy Efficient/Alternative Energy Funding	Increase efficiency and pursue alternative energy opportunities.	Ongoing	100 residential units retrofitted for emergency efficiency.	City of Redlands Building and Safety Division	Staff time

6 REVIEW OF PAST ACCOMPLISHMENTS

6.1 PURPOSE OF REVIEW

State law (California Government Code Section 65588(a)) requires that each jurisdiction "review its housing element as frequently as appropriate to evaluate all of the following:

(1) The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal.

(2) The effectiveness of the housing element in attainment of the community's housing goals and objectives.

(3) The progress of the city, county, or city and county in implementation of the housing element.

(4) The effectiveness of the housing element goals, policies, and related actions to meet the community's needs, pursuant to paragraph (7) of subdivision (a) of Section 65583."

According to the California Department of Housing and Community Development (HCD), the three areas of requisite analysis are:

- Review the results of the previous housing element's goals, objectives, and programs. The results should be quantified where possible but may be qualitative where necessary.
- Compare what was projected or planned in the previous housing element to what was actually achieved. Determine where the previous housing element met, exceeded, or fell short of what was anticipated.
- Based on the above analysis, describe how the goals, objectives, policies, and programs in the updated housing element are being changed or adjusted to incorporate what has been learned from results of the previous housing element.

6.2 HOUSING PRODUCTION, REHABILITATION, AND CONSERVATION

The Housing Element established quantified objectives for new, rehabilitated, and preserved housing stock, as shown in Exhibit 1, Quantified Objectives of the 5th Cycle Housing Element. Ultimately, the objective identified a total of 2,880 new, rehabilitated, and conserved units over the 5th Cycle (Housing Element, page 7-2), which is consistent with and exceeded the Regional Housing Needs Allocation (RHNA) goal of 2,429 units across all income levels.

EXHIBIT 1: QUANTIFIED OBJECTIVES OF THE 5TH CYCLE HOUSING ELEMENT

Income Category	*RHNA 2014-2021*	*New Construction*	*Rehabilitation*	*Conservation/ Preservation*	*Total (New Construction, Rehab, and Conservation/ Preservation)*
Extremely Low (less than 30% of AMI)[1]		280	20	30	330
Very Low (between 30-50% of AMI)	579	300	20	30	350
Low (between 50-80% of AMI)	396	400	100	0	500
Moderate (between 80-120% of AMI)	453	500	0	0	500
Above Moderate (over 120% of AMI)	1,001	1,200	0	0	1,200
Total	2,429	2,680	140	60	2,880

1. The "extremely low-income" category is not included in the Regional Housing Needs Assessment (RHNA). However, cities are charged with addressing the housing needs of this population in the housing element. The extremely low-income totals are based on an estimated average of 50% of all very low-income (between 30-50% of AMI) participants in all active programs. This estimation is also based on the percentage of Redlands households whose income falls below 30 percent of AMI, according to the 2007-2011 ACS.

Source: Table 7.1-1: Quantified Objectives in 5th Cycle Housing Element.

6.3 HOUSING PRODUCTION: 2013-2019

The 2019 Housing Element Annual Progress Report (APR) demonstrates that the City has not met these quantified objectives. Table 6-1 demonstrates that the City has permitted a total of 469 units since 2013, including 1 unit of very low-income housing, 18 units of low-income housing, 4 units of moderate-income housing, and 446 units of above-moderate housing. There are 1,960 total remaining units in the RHNA. The City has also approved many units that are still pending construction, including 80 deed-restricted units for lower-income veterans.

6.4 REHABILITATION

In 2016, the City of Redlands began to utilize the 'City Works' program to track records pertaining to home rehabilitation. Since 2016, 11 homes have been substantially rehabilitated, all of which were single-family dwellings. Of these, 5 were deemed to be unsafe structures. Of these 5 unsafe/uninhabitable structures, 3 were unsafe/inhabitable due to fire damage, and 2 became unsafe/uninhabitable structures after unpermitted work was performed to the structure. Additionally, the APRs from 2014 to 2019 indicate that no units were rehabilitated. This is short of the goal of 140 rehabilitated units.

6.5 CONSERVATION/PRESERVATION

The APRs from 2014 to 2019 indicate that no units were conserved/preserved, short of the goal of 60 units.

6.6 EFFECTIVENESS AT ASSISTNG SPECIAL NEEDS POPULATIONS

In the previous element, the City included many programs to address the needs of special needs populations, including the populations described below. The following describes the efforts of the City in meeting these special needs.

6.6.1 CBDG Funds

The City has utilized CDBG funds to make neighborhood improvements, including accessibility improvements. In the 2020-2021 fiscal year, HUD allocated $427,405 in CDBG funds to the City of Redlands.

Funds used included the following neighborhood improvements:

- Alleyway Improvements Paving in CDBG Target Areas
- ADA improvements consisting of removal of architectural barriers at various public facilities
- Sylvan Park restroom rehabilitation

Additionally, the City provides CDBG funding to the following service providers:

- Family Service Association of Redlands
- YMCA of the East Valley
- Inland Temporary Homes
- Boys and Girls Club
- San Bernardino Sexual Assault Services
- Steps 4 Life (rapid re-housing program)

6.6.2 Extremely Low Income Population

The City has maintained the Mobile Home Rent Control Ordinance, which limits rent increases to no more than the CPI index in each given year. This ordinance will continue into the next cycle. This ordinance supports the special needs of the population residing in Redlands' seven mobile home parks.

The City allocates CDBG funds to Inland Temporary Homes. Inland Temporary Homes provides eviction prevention assistance due to COVID-19 related impacts for anyone with up to 80 percent AMI, which can prevent COVID-19 related displacement.

Redlands Family Service Association received CDBG grants from the City. Redlands Family Service provides rental assistance to qualifying families.

6.6.3 Homeless

The City allocated CDBG funds to Inland Temporary Homes and the Family Service Association of Redlands. Inland Temporary Homes used these funds to provide services such as housing navigation, security deposit, rental assistance, utility deposits, case management, mental health services, life skills classes, and follow-up services with rapidly rehoused individuals. Redlands Family Service Association provides emergency rental assistance, food assistance, clothing, bus passes, gas cards, hygiene kits, classes, a computer lab, and employment referrals.

In 2018 the Redlands Police Department launched a Homeless Outreach Program that created the role of the Community Outreach Coordinator. The Community Outreach Coordinator partners with local service providers and faith-based organizations to provide resources to and seek positive long-term solutions for persons experiencing homelessness in Redlands.

6.6.4 Elderly

The City runs a Redlands Senior Citizen Hotline that support residents 55 years or older in crisis. The elderly may contact this line for support with meals, groceries, routine calls as part of the "Never Alone" project, and health and safety verification.

The City also runs a senior transportation program that provides discounted rides to elderly residents who are unable to provide their own transportation for necessary services.

The City allocates CDBG funds to Inland Temporary Homes, which provides eviction prevention assistance due to COVID-19 related impacts. This support assisted the elderly with finding solutions to maintain their homes while maintaining their health.

6.7 ADEQUATE SITES FOR 5TH CYCLE RHNA

For the 5th Cycle Housing Element, the City was allocated 2,429 housing units as its share of the regional housing need. Table 6-1, 5th Cycle RHNA Allocation and Production by Income Category, shows the distribution of this regional share into four income categories.

TABLE 6-1: 5TH CYCLE RHNA ALLOCATION AND PRODUCTION BY INCOME CATEGORY

	Very Low	Low	Moderate	Above Moderate	Total
5th Cycle Allocation	579	396	453	1,001	**2,429**
Units Permitted	1	18	4	446	**469**
Remaining Allocation	578	378	449	555	**1,960**

The 5th Cycle provided capacity for 3,849 units (Table 4.1-1 of the 5th Cycle Housing Element). At the beginning of the 5th Cycle, the City amended the Downtown Specific Plan allow for high density multi-

family housing by-right. These amendments significantly increased zoned capacity for all income levels in Redlands.

The City reviewed its previous RHNA sites, past approvals, and the zoning code and determined that it has maintained adequate sites to meet the RHNA for all income levels throughout the 5th Cycle.

6.8 HOUSING ELEMENT PROGRAMS: ASSESSMENT OF ACCOMPLISHMENTS

The 5th Cycle Housing Element contains 60 programs, many of which are simply routine services and staff functions that need not be identified as Housing Element programs. Many housing programs are repetitive and represent specific activities that can be grouped into one program. For ease of annual reporting and tracking of measurable actions, the 6th Cycle Housing Element programs were modified as shown below.

Three criteria were considered when evaluating the performance of programs in the 5th Cycle:

1. The lack of timely implementation
2. Actions the City will take to better implement programs in the 6th Cycle
3. The effectiveness of programs

In 2012, the State abolished redevelopment in California. The City's Redevelopment Agency, as was the case in most cities statewide, was most involved with housing and housing programs. The elimination of redevelopment removed the City's only dedicated funding source for affordable housing. This affected not just programs but also staff for administering affordable housing activities, such as the variety of programs included in the 5th Cycle Housing Element. Going forward, for the 6th Cycle, the City will be dedicating certain staff resources to affordable housing activities and will be able to implement the Housing Element more effectively.

This section evaluates the programs identified in the 5th Cycle Housing Element and evaluates the progress of the programs using the 2019 APR. Evaluation notes and recommendations are in the accomplishments column.

TABLE 6-2: 5TH CYCLE PROGRAMS

Name of Program	Objective	Time Frame	Status (2019 APR)	Accomplishments: Results and Evaluation
7.1-1 Make Zoning Ordinance Changes for Group Homes, Boardinghouses, and Single Room Occupancy (SRO) Units	Evaluate and modify the zoning ordinance.	8/1/2014	Development Services Department staff plans to accomplish this task in 2020.	No accomplishments due to lack of staffing resources. Continued Appropriateness: Retained and modified. See Programs 1.2-4 and 1.2-5.

7.1-2 Implement Zoning Ordinance to Include Standards for Single Room Occupancy (SRO) Housing within the Downtown Specific Plan Area	Provide a valuable source of affordable, low-cost housing.	10/1/2020	The City is working on adopting a Transit Villages Specific Plan for land areas close to the City's three rail stations. Once adopted, the Transit Villages Specific Plan will replace the Downtown Specific Plan. Standards for SRO are expected to be addressed in the Transit Villages Specific Plan.	Staff is currently developing the Transit Villages Specific Plan, which will revise SRO standards within in the current Downtown Specific Plan area. Continued Appropriateness: Revised. See Program 1.1-3.
7.1-3 Treat Transitional Housing the Same as Other Residential Uses in the Same Zone	Continue current practice to treat transitional and supportive housing the same as any other residential use in the same zone.	10/1/2021	Development Services Department is initiating an effort to amend the zoning code to address transitional and supportive housing so that they are treated the same as other residential uses in the same zone.	Continued Appropriateness: Modify. See Programs 1.2-3 and 1.2-5.
7.1-4 Encourage Limited Equity Cooperatives. Retain Existing Policy of Encouraging Formation of Limited Equity Stock Cooperatives	Encourage and support cooperatives in Redlands.	10/1/2021	Ongoing. The City has not received any applications for a Limited Equity Cooperative. If the City receives an application, it will work with the applicant to facilitate creation of a cooperative.	No accomplishments. There are existing cooperatives in the City; however, there were no new applications for housing cooperatives during the 5th Cycle. Continued Appropriateness: Remove.
7.1-5 Maintain Second Unit Dwelling Unit Ordinance	Maintain the existing ordinance and keep track of second units being developed under the ordinance.	10/1/2021	The City is enforcing the state's Accessory Dwelling Unit ordinance while initiating a zoning code amendment to adopt the City's own Accessory Dwelling Unit ordinance.	The City has not adopted revisions to the Second Dwelling Unit ordinance (RMC 18.156.440). The ordinance has been drafted and reworked by Development Services staff and sent to the City Attorney for review. This review is pending.

				In the interim, the City is implementing State law. Continued Appropriateness: Modify The City is including Program 1.6 to update the ADU ordinance to meet state requirements, track ADUs, and facilitate ADU production for lower-income households.
7.1-6 Launch Second Dwelling Unit Public Awareness Campaign	Inform the public about the opportunity to build second units in any residential zone on a parcel with an existing single-family unit.	10/1/2021	The City is enforcing the state's Accessory Dwelling Unit ordinance while initiating a zoning code amendment to adopt the City's own Accessory Dwelling Unit ordinance. The public awareness campaign will be included in the public comment/review process of ordinance adoption.	The City has updated its website to provide clear, accessible, and relevant information regarding the ability to build ADUs. The City has not adopted revisions to the Second Dwelling Unit ordinance (RMC 18.156.440). Continued Appropriateness: Modify. See Program 1.6-1.
7.1-7 75/25 Ratio	Maintain as a long-term planning goal, in accordance with Measure U, 75% single-family units to 25% multifamily units at General Plan buildout.	10/1/2021	Ongoing.	Continued Appropriateness: Remove This program does not further housing access in the City, and is a requirement based on the Measure U referendum. The program is superseded by Housing Element law.
7.2-1 Support Housing Providers	Support efforts of for-profit and nonprofit housing sponsors in constructing, acquiring, and improving	10/15/2021	Ongoing.	No accomplishments. There are no verifiable City-initiated efforts to create a partnership or support housing developers in Redlands. The City did approve an

	low- and moderate-income housing.			80-unit affordable housing project (deed restricted). City staff assisted the developer through the application process and recommended approval, though no partnership was established. Continued Appropriateness: Remove. The City is including many programs specifically designed to facilitate low and moderate-income housing production through Programs 1.1-, 1.3-, and 1.4-.
7.2-2 Continue Use of Mortgage Revenue Bonds	Participate in mortgage-revenue bond programs undertaken by the County of San Bernardino.	8/1/2014	The County of San Bernardino is currently not pursuing use of mortgage revenue bonds at this time. Due to historically low interest rates on the open market the program is not competitive.	No accomplishments. This program proved to not be viable in current market conditions. Continued Appropriateness: Remove.
7.2-3 Determine the Feasibility of Using Mortgage Credit Certificates	Determine the feasibility for a program in Redlands.	8/1/2014	Ongoing.	No accomplishments. It is unknown if staff contacted agencies within six months of adoption of the 5th Cycle Housing Element. Due to staff turnover, this information is not available. Continued Appropriateness: Remove.

7.2-4 Participate in the (HUD) HOME Investment Partnership Program for Multi-Family Housing	Provide funds for new construction, acquisition or rehabilitation of multifamily housing.	10/1/2021	The City continues to explore all available resources and partnership opportunities.	No accomplishments. Continued Appropriateness: Remove The City does not administer or facilitate acquisition of HOME or CDBG funding.
7.2-5 Promote the Use of Low-Income Housing Tax Credits	Provide assistance in accessing low-income housing tax credits and a means of financing low-income housing development.	10/1/2021	Ongoing. The City assists developers in applying for low-income housing tax credits when there is an opportunity.	No accomplishments. Continued Appropriateness: Remove. This program is a standard city process. The City will continue to assist developers in applying for low-income tax credits as opportunities arise.
7.2-6 Continue Public Housing and Section 8 Programs	Develop, maintain, and improve extremely low-, very low-, and low-income housing.	10/1/2021	The City cooperates with the Housing Authority of San Bernardino County (HASBC) in locating suitable sites or existing properties that can be rehabilitated, and in obtaining funding to create public housing or Authority-owned Section 8 units.	No accomplishments. The APRs indicate that there have been no units of housing that have been rehabilitated/improved. It is not clear that the City has directly facilitated acceptance or construction of units that allow Section 8 funding. With the cessation of redevelopment agencies, the City transferred many of its housing duties to the Housing Authority of the County of San Bernardino. Continued Appropriateness: Modify The City has modified this program through programs 1.4-, which will

				incentivize and preserve at-risk housing.
7.2-7 Continue Mobile Home Rent Control	Limit rent increase in existing parks to no more than the CPI index for that year.	10/1/2021	Ongoing.	The City continues implementation of rent control ordinance. Continued Appropriateness: Retain Program 1.5-9.
7.2-8 Implement Housing Referral and Placement Program	Link those needing housing with those wanting to share their homes or take advantage of the City's Second Dwelling Unit ordinance.	2/1/2016	Delayed due to a lack of staff resources. However, the City is enforcing the state's ADU ordinance and has been approving ADUs subject to development standards set forth by the state.	No accomplishments. Continued Appropriateness: Remove. The City is continuing to facilitate lower-income ADU occupancy through Program 1.6.
7.2-9 Remove Constraints to Affordable Housing Development in Downtown	No longer require a CUP for housing development in Zones C-3 and C-4 in Downtown.	12/1/2014	The City was awarded a Caltrans grant to work on the Transit Villages Specific Plan in anticipation of the Metrolink/ Arrow light rail trains coming to three new train stations in the City, including a new station at downtown Redlands. Once the plan is adopted, it will replace the Downtown Specific Plan. Removal of constraints to affordable housing development in downtown will be analyzed and incorporated into the Specific Plan.	Staff is currently developing the Transit Villages Specific Plan, which will replace the Downtown Specific Plan. Continued Appropriateness: Combine Combine all programs involving the Transit Villages/downtown area into a single program (Program 1.1-3).

7.2-10 Transit Oriented Development (TOD)	Promote TOD in Redlands by providing a 25% housing density/FAR bonus to projects located within a half-mile of the proposed transit station.	12/1/2015	Ongoing. City offers density bonus consistent with the state law. The City is currently developing a Transit Villages Specific Plan to replace the Downtown Specific Plan.	No accomplishments. This program was originally intended for a comprehensive update of the current Downtown Specific Plan. This has been replaced with the new Transit Villages Specific Plan, currently undergoing environmental review. Continued Appropriateness: Combine Combine all programs involving the Transit Villages/downtown area into a single program. See Program 1.1-3.
7.2-11 Assist with Foreclosure Prevention	Help Redlands homeowners avoid foreclosure by promoting available assistance programs.	10/1/2021	Ongoing. City includes and provides information about foreclosure assistance programs at the counter and City website.	Implemented. A record was not kept of updates to the foreclosure prevention resources. Continued Appropriateness: Modify. See Program 1.3-6. The City will change its practices to review the website annually. This information will continue to be provided at the counter. The City's 6th Cycle Housing Element proposed several cross-coordinated programs to better provide information and materials to residents by way of website updates, hard copy materials at the Planning counter, and outreach events.

7.2-12 Lot Consolidation	Encourage lot consolidation to promote affordable housing development.	10/1/2021	Ongoing	The City uses its 5th Cycle inventory to identify opportunities for lot consolidation. There are no dedicated implementation actions other than maintaining the sites inventory for lower-income sites. Continued Appropriateness: Modify The program was modified to include more specific actions. See Program 1.1-9.
7.2-13 Incentive for Private Land Assembly	Provide an additional incentive beyond that provided by the state-required density bonus.	2/1/2015	City does not have resources to provide additional incentives.	No accomplishments. The City was unable to appropriate or identify resources to implement this program. Continued Appropriateness: Remove
7.3-1 Continue to Work with Nonprofit Organizations to Identify the Need for Group Homes and Community Care Facilities for Individuals Unable to Live Independently	Assist in identifying appropriate sites under the City's zoning code.	2/1/2015	Ongoing. The City has a list of sites that it can provide to service providers.	Implemented. Continued Appropriateness: Remove. This is part of standard operating procedure, code implementation and standard business operations.
7.3-2 Continue the Use of Federal Funding for Very Low- and Low-Income Senior and Handicapped Housing	Assist nonprofit developers to identify programs and provide technical assistance in obtaining funding.	10/1/2021	Ongoing.	No accomplishments. It is not clear that this has been accomplished, or that there has been interest in this program. The City has engaged in an on-call planning consulting contract that includes grant writing and application support.

				Continued Appropriateness: Remove.
7.3-3 Encourage Congregate Housing	Ensure City policies and zoning do not hinder such development.	10/1/2021	Ongoing.	No accomplishments. It is unclear if the zoning code would preclude this type of housing, or if modifications are necessary to implement this program. Continued Appropriateness: Remove *Unless mandated by state law.*
7.3-4 Encourage Single-Room Occupancy Housing	Encourage the maintenance and development of single-room occupancy housing.	10/1/2021	Ongoing	No accomplishments. The program calls for identifying existing structures and sites, discussing with developers, and establishing incentives. It is not clear that these actions have been taken. Continued Appropriateness: Remove
7.3-5 Assist Nonprofits in Providing Emergency Shelter Services and Transitional Housing	Provide emergency shelter and transitional housing support.	10/1/2021	As a Participating Jurisdiction (PJ) in the County of San Bernardino's Urban County CDBG program, the City allocated funds to both Inland Temporary Homes and Family Service Association of Redlands for the purposes of preventing homelessness during this reporting period.	Implemented. Continued Appropriateness: Modify. See Program 1.2-1. Continued general support is part of standard operating procedure, code implementation and standard business operation. In November 2021, the City approved a contract with two nonprofits to convert the Good Nite

				Inn, a motel, into a supportive housing facility.
7.3-6 Continue to Investigate Participation in the Permanent Housing for the Handicapped, Homeless (PHH) Program	Consider programs in Redlands.	10/1/2021	City will work with applicants if an application is received. Other outreach efforts have not taken place due to lack of staff resources.	No accomplishments. Continued Appropriateness: Remove.
7.3-7 Promote Housing and Services for Persons with Developmental Disabilities	Inform families in Redlands about housing and services available for persons with developmental disabilities.	2/1/2016	Delayed due to lack of staff resources.	No accomplishments. Implementation of this program was affected by staff turnover. Continued Appropriateness: Remove
7.3-8 Assess and Address the Housing Needs of Large Families and Overcrowded Households	Determine if overcrowding is being underreported and better assess conflicting information.	8/1/2015	Not completed due to lack of staff resources.	No accomplishments. Implementation of this program was affected by staff turnover. Continued Appropriateness: Remove
7.4-1 Update the Zoning Ordinance to Include Standards for Congregate Housing in Medium Density Areas Designated on the General Plan Diagram	Give more emphasis and greater point value to projects that include housing affordable to extremely low-, very low-, and low-income households.	10/1/2015	Delayed due to lack of staff resources.	No accomplishments. Implementation of this program was affected by staff turnover. Continued Appropriateness: Remove
7.4-2 Continue Giving More Points to Affordable Development in the Residential Development Allocation Process	Give more emphasis and greater point value to projects that include housing affordable to extremely low-, very low-,	10/1/2021	Completed and ongoing.	The City continued to prioritize the point-based system to lower-income households until the implementation of SB 330. Note: SB 330 has invalidated the City's Residential Development Allocation

	and low-income households.			process, both the limitation on annual permits and the competitive points process. Barring an extension by the state, the City's RDA process would resume in 2025 and is therefore still relevant to the 6th Cycle Housing Element update. Continued Appropriateness: Remove
7.4-3 Evaluate Development Fees	Give more emphasis and greater point value to projects that include housing affordable to extremely low-, very low-, and low-income households.	02/2015, ongoing, biennial basis.	Completed and ongoing.	The City continues to update the impact fees to reflect the current fair share cost of infrastructure and services. They were last updated in 2019. Continued Appropriateness: Modify. See Programs 1.2-6 and 1.2-14. The City should consistently evaluate the existing fees for fair share costs and consider ways for fees to be reduced.
7.4-4 Participate in Establishment of Building Code	Help ensure unnecessary costs are not added while criteria are incorporated to assist those with special housing needs.	10/1/2021	Completed and ongoing.	The City has adopted the state code building code by reference. Continued Appropriateness: Remove This program can be removed unless the City makes any modifications to the code requirements for the purpose of making new housing construction more affordable.
7.4-5 Continue One-Stop Permit Processing	Streamline the development process.	10/1/2021	Improvements/enhancements to the One-stop Permit Processing are evaluated	The City continues to use its one stop process. Continued Appropriateness: Remove

			annually as part of the budget process.	This program represents typical business at the City, and could be combined with other programs that encourage permit streamlining.
7.4-6 Maintain Current Planned Residential Development Standards	Allow flexible open space and setback standards.	10/1/2021	Ongoing.	Ongoing program; no accomplishments. Continued Appropriateness: Remove The process of maintaining and enforcing existing code requirements should not be considered a housing program.
7.4-7 Continue to Allow Mixed Use Zoning	Provide additional incentives to create housing.	2/1/2017	Ongoing.	Staff is currently developing the Transit Villages Specific Plan, which will replace the Downtown Specific Plan. Continued Appropriateness: Combine Combine all programs involving the Transit Villages/downtown area into a single program. Recommend identifying and listing the incentives referenced. See Programs 1.1-3 and 1.2-12.
7.4-8 Mitigate Finance Costs for Low-Income Projects	Promote programs that reduce costs for low-income projects	10/1/2021	Ongoing.	No accomplishments. This program proved too vague to implement. This City is implementing multiple programs to reduce costs for housing development. Continued Appropriateness: Modify. See Program 1.5-10.

7.4-9 Maintain a Large Supply of Available Sites to Maintain Competitive Land Costs	Ensure competition among landowners to help maintain lower land costs.	10/1/2021	Ongoing.	The City has maintained sites in excess of the RHNA requirement. Continued Appropriateness: Modify. The City is required by SB 166 to maintain sites in excess of the remaining RHNA requirement. The City has a no net loss program. See Program 1.1-5.
7.4-10 Continue to Operate a Fast-Track Development Process	Reduce processing time by being flexible on submittal dates and overlapping processes.	10/1/2021	Ongoing.	Staff continues to implement this program. Continued Appropriateness: Remove.
7.4-11 Evaluate and Revise Zoning Standards	Reflect current needs.	10/1/2021	Ongoing. Several amendments were approved in 2017 and 2018.	Several amendments were made to the code in the last cycle. Continued Appropriateness: Modify. City is implementing a suite of development constraint removal programs under Programs 1.2-.
7.4-12 Continue to Evaluate the Necessity of Amending the Zoning Code to Raise the Threshold of Multi-Family Dwelling Units for Establishing the Requirements of a Conditional Use Permit	Make sure the Conditional Use Permit (CUP) requirement does not cause a potential impediment to achieving housing goals.	2/1/2016	The City has evaluated this and has determined that the CUP requirement has not been an impediment to multi-family development. The evaluation consisted of a review of all applications for Multi-Family projects. It was determined that projects that proceeded beyond the completeness review were unaffected by the requirement to obtain an CUP and were subsequently	This has been completed. Staff determined that the CUP requirement does not impede multi-family development. Continued Appropriateness: Modify. Addressed in Program 1.2-13 Remove CUP Requirement.

			approved. No multi-family projects requiring a CUP were denied.	
7.4-13 Change Zoning Ordinance to Allow Group Homes of Six or Fewer Residents (Zoning Ordinance Change)	Amend the current zoning ordinance to reflect state law.	2/1/2016	In process.	Implemented. Continued Appropriateness: Modify. Program 1.2-5 will review standards for large group homes of 7 or more persons.
7.4-14 Socio-Economic Cost-Benefit Study	Ensure socioeconomic cost-benefit studies (SECBS) are not used as a basis for denying a development project consistent with the General Plan and Zoning Ordinance.	10/1/2021	Ongoing.	Implemented. No projects have been denied on the basis of the SECBS studies. SECBS standards are objective. Continued Appropriateness: Modify. Program 1.2-8 will review and revise the SECBS standards for consistency with SB 330 regarding objective standards.
7.5-1 Continue Community Development Block Grant (CDBG) Program	Be able to support a variety of programs supporting low- and moderate- income households and neighborhoods.	10/1/2021	During this reporting period the City was a Participating Jurisdiction (PJ) in the City of San Bernardino's Urban County CDBG and ESG Programs in order to continue supporting low- and moderate-income households and neighborhoods.	The County implements the program directly by setting CDBG funding priorities and creating an annual strategy. Continued Appropriateness: Modify. Program 1.5-10promotes awareness of available funding.

7.5-2 Continue Adaptive Reuse of Single-Family Homes	Balance the need for more affordable housing and housing choice with the need to preserve Redlands' traditional appearance and atmosphere.	10/1/2021	Ongoing.	Completed. RMC refers to the conversion of housing to commercial uses. Continued Appropriateness: Remove.
7.5-3 Continue Condominium Conversion Ordinance	Prohibit condominium conversions unless City zoning and housing code standards are met.	10/1/2021	Ongoing.	This is an existing code requirement and staff continues to implement it. Continued Appropriateness: Remove Chapter 17.25 of the RMC governs condominium conversions. The program essentially results in the enforcement of the existing ordinance, which is considered standard business and not a housing element program.
7.5-4 Continue Senior and Handicapped Housing Grant Program	Use CDBG funding to provide repair grants to handicapped people.	None identified	Ongoing.	Discontinued. This program falls under the category of Shelter/Transitional Housing in City records. A total of 168 individuals/households received shelter/transitional housing assistance from CDBG funds during the 5th Cycle. The City will review Housing Element programs in the 6th Cycle to build and prioritize a projects list that would be funded by CDBG. Continued Appropriateness: Modify. Program 1.5-10 promotes awareness of available funding.

7.5-5 Continue CDBG Rental Rehabilitation Program	Provide CDBG loans with deferred repayment for rehabilitating rental units.	None identified	Ongoing.	City records have been obtained for CDBG expenditures during the 5th Cycle. Assistance under the category of Emergency Food/Rental Assistance was provided to a total of 2,442 individuals/households during the 5th Cycle. See Program 1.5-10.
7.6-1 Buy-Out Assistance for HUD-Financed Projects	Help prevent below market rate units threatened with conversions to market rate.	2/1/2016	Ongoing.	It is unclear from City records if this program was utilized. The City assisted 2,442 individuals/households with emergency food/rental assistance, and 169 individuals/households with shelter/ transitional housing. It is not known if Program 7.6-1 is included in those statistics. Continued Appropriateness: Modify. Program 1.5-10 promotes awareness of available funding
7.6-2 Continue to Implement Regulations to Promote Mobile Homes	To retain existing mobile home parks and encourage new mobile home parks and subdivisions.	10/1/2021	Ongoing.	Implemented. RMC allows new mobile home parks. Continued Appropriateness: Modify. Continue to implement Program 1.5-9 Mobile Home Rent Control ordinance.
7.7-1 Continue Fair Housing Counseling	Provide landlord-tenant mediation and fair housing counseling.	10/1/2021	The City is a Participating Jurisdiction (PJ) in the County of San Bernardino's Urban County CDBG, HOME, and ESG Programs. Landlord-tenant mediation and fair housing services are available to Redlands residents from	Implemented via County contract with the fair housing service provider, Inland Fair Housing Mediation Board. City records indicate 403 households were assisted. Continued Appropriateness: Continue Programs 1.5-7 and 1.5-2.

			the Inland Fair Housing and Mediation Board.	
7.7-2 Disseminate Fair Housing Information	Conduct public outreach.	10/1/2021	Fair housing and landlord-tenant mediation resource materials are available at a variety of public counters at the City Hall, as well as at the A.K. Smiley Public Library, Senior and Recreation Centers, and City website.	Implemented. Continued Appropriateness: Modify. See Programs 1.5-3 and 1.5-4.
7.8-1 Implement Subdivision Ordinance	Continue subdivision map review to be consistent with 2002 ordinance requirements to reduce residential energy use.	10/1/2021	Ongoing.	This program reflects standard implementation of state law. Continued Appropriateness: Remove Recommend removal because this is a state requirement.
7.8-2 Encourage Land-Use Patterns and Densities to Facilitate Energy Efficient Public Transit Systems in New Development Areas	Encourage land-use patterns and densities to facilitate energy-efficient public transit systems in new development areas.	10/1/2021	This planning concept was incorporated in the City's recent General Plan Update and implementation is in process. One example is the Transit Villages Specific Plan that the City is developing for the land areas surrounding three future train stations in the City.	This program was completed during the comprehensive General Plan Update. Continued Appropriateness: Remove
7.8-3 Encourage Neighborhood Services Retention and Development	Reduce energy consumption and promote neighborhood identity.	10/1/2021	Ongoing.	It is unclear if the City has adopted revisions to its land use plans to facilitate and allow for neighborhood level commercial that is considered walkable. The General

				Plan does show that there are a few properties zoned for neighborhood commercial in single family areas. Continued Appropriateness: Remove.
7.8-4 Pursue Energy Efficient/Alternative Energy Funding	Increase efficiency and pursue alternative energy opportunities.	10/1/2021	Ongoing. The City participates with the California Enterprise Development Authority (CEDA) and the California Statewide Communities Development authority (CSCDA) and their affiliated financing partners in offering multiple programs for financing energy upgrades and improvements to commercial and residential property owners.	The City offers multiple programs for financing energy upgrades and improvements to commercial and residential property owners. Continued Appropriateness: Retain. See Program 1.7-3.
7.9-1 Augment Density Bonus	To consider incentives beyond state law.	8/1/2015	Not completed due to lack of staff resources.	No accomplishments. Continued Appropriateness: Remove.
7.9-2 Evaluate Allowing Residential Uses in C-1 Neighborhood Stores and C-2 Neighborhood Convenience Centers District	Allow residential uses as a permitted use subject to a CUP in the C-1 and C-2 zones.	2/1/2016	Delay due to lack of staff resources.	No accomplishments. Continued Appropriateness: Modify. See Programs 1.2-12 and 1.2-13.
7.9-3 Explore Mixed-Use Development Possibilities for Redlands Metrolink Stations	Amend the zoning code to add residential uses as a use permitted subject to a CUP in the C-1 and C-2 zones.	2/1/2017	In progress as part of the Transit Village Specific Plan project.	In progress. Continued Appropriateness: Modify. See Program 1.1-3.

7.9-4 Evaluate Initiating a Ballot Measure to Allow Carryover of Unused Building Permit Allocations from Year to Year	Consider an amendment to Measure N.	2/1/2017	Not completed.	A referendum to modify portions of Measure N failed in the March 2020 primary. Continued Appropriateness: Remove
7.9-5 Continue Use of the Mills Act	Allow for agreements that provide for reduction in property taxes in exchange for continued preservation of a property.	10/2021	Ongoing.	Implemented. Continued Appropriateness: Remove. Not relevant to housing production goals and policies.

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.

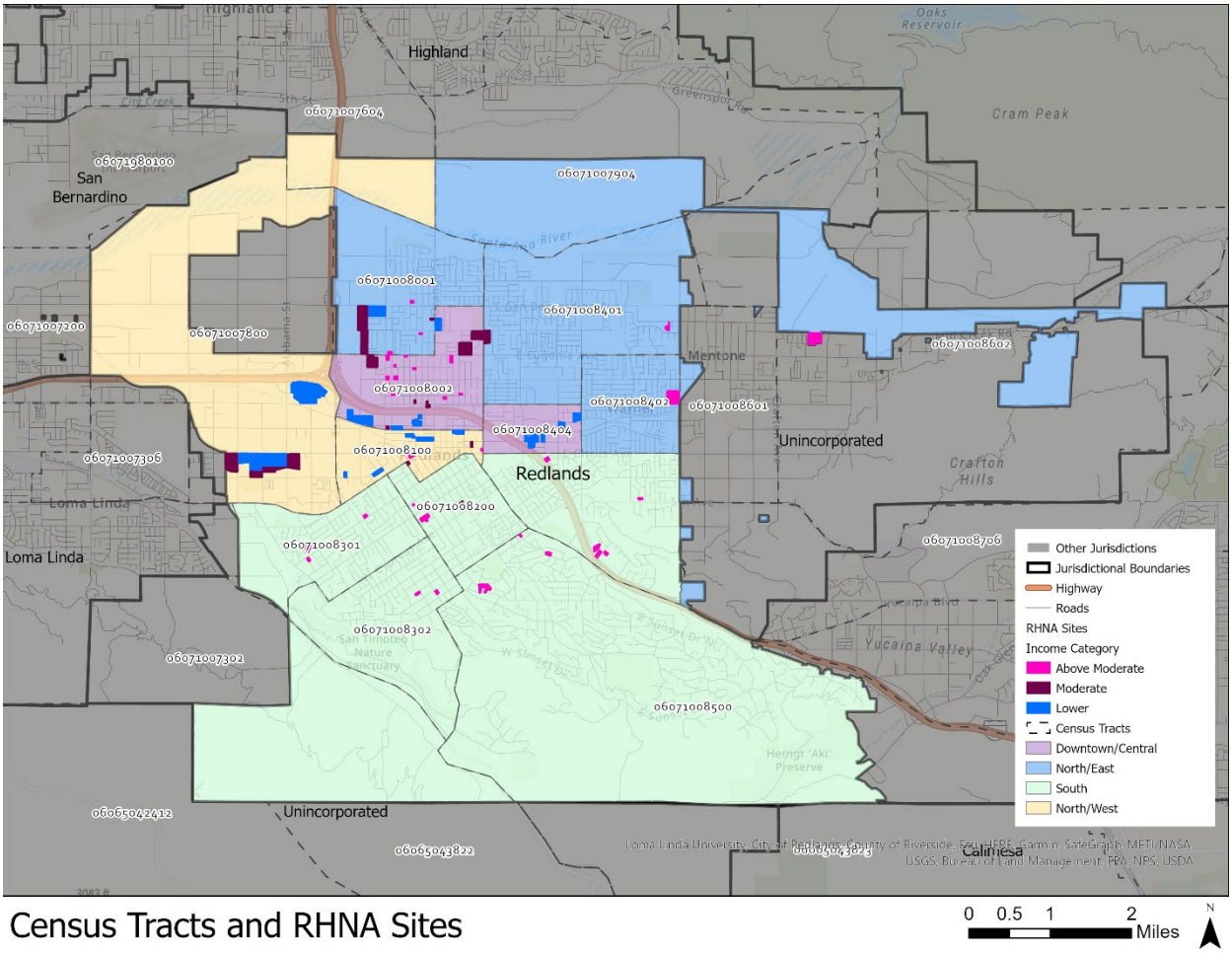
7.3.2 City and Sites Overview

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

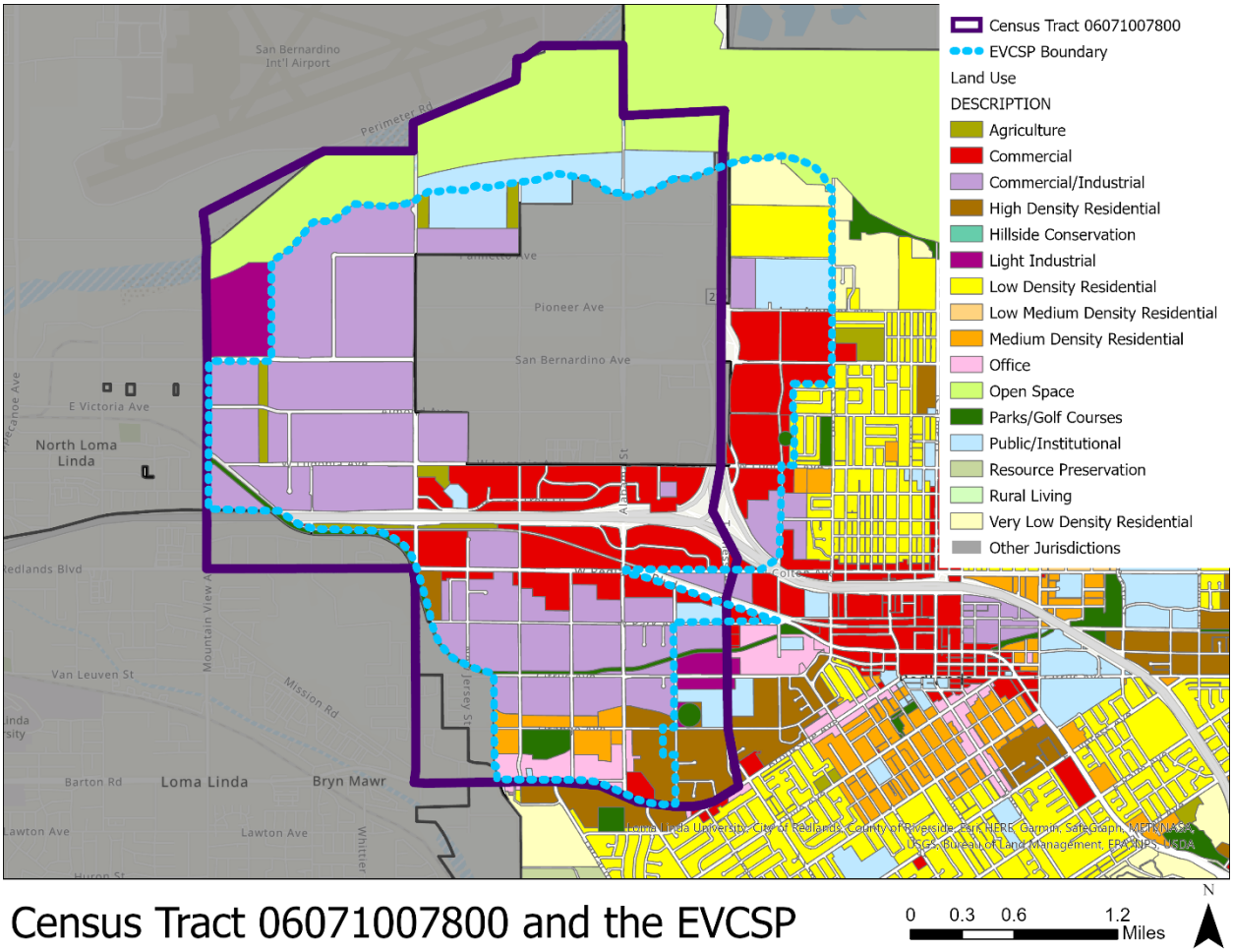
Source: American Community Survey 2019 5-Year Estimates

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

0 0.3 0.6 1.2 Miles

N

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.

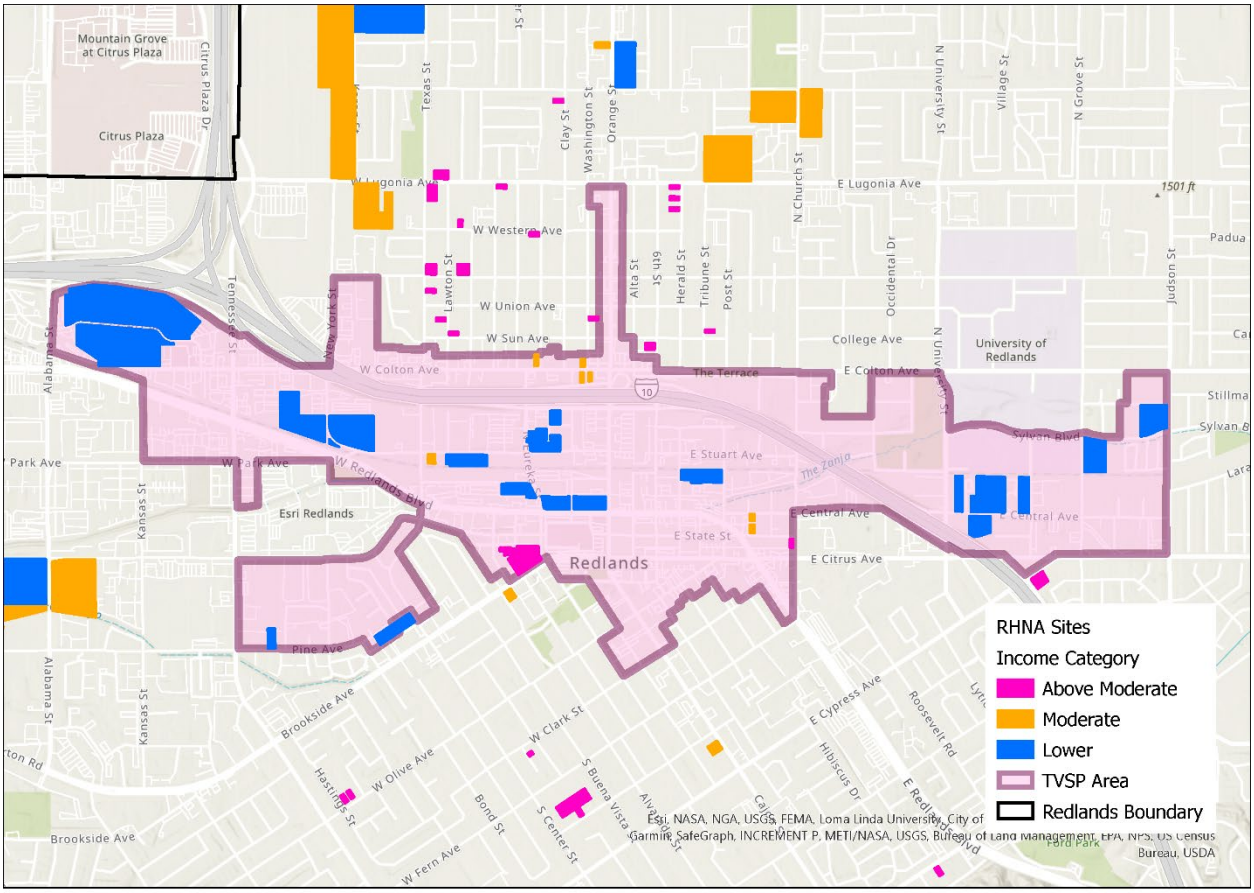
- **Redlands Garage:** The construction of a four-deck parking garage to service the Metrolink platform and nearby businesses. The parking garage includes a ground floor retail component, public art installations, common open space, and electric vehicle charging.

- **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



RHNA Sites and the TVSP

0 0.25 0.5 Miles

N

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).

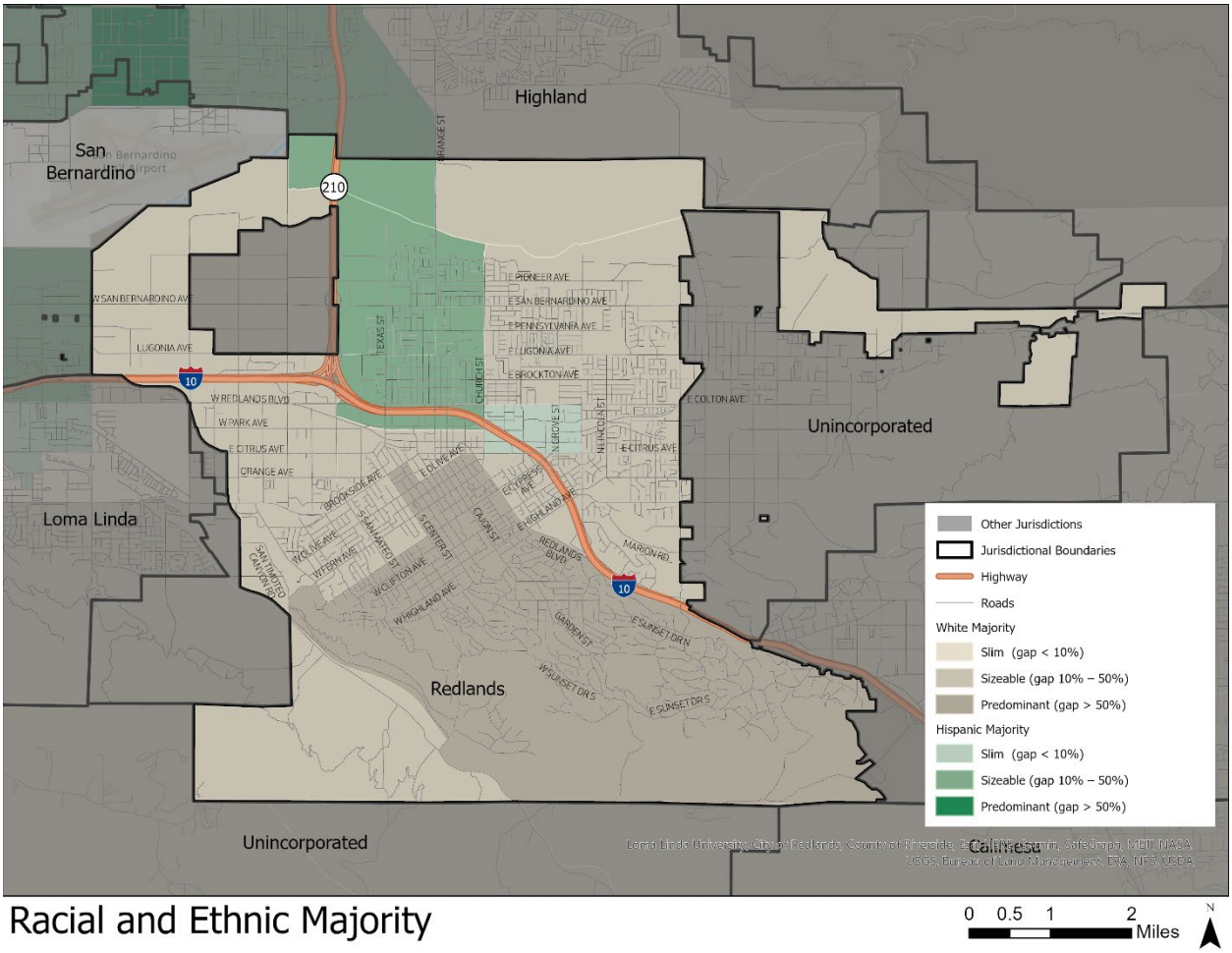
In the 1960s, the central area that is now the downtown area of Redlands had the most racial diversity. Racial covenants maintained the south and east of the City as majority White. The southeast city still has a predominant white majority.

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

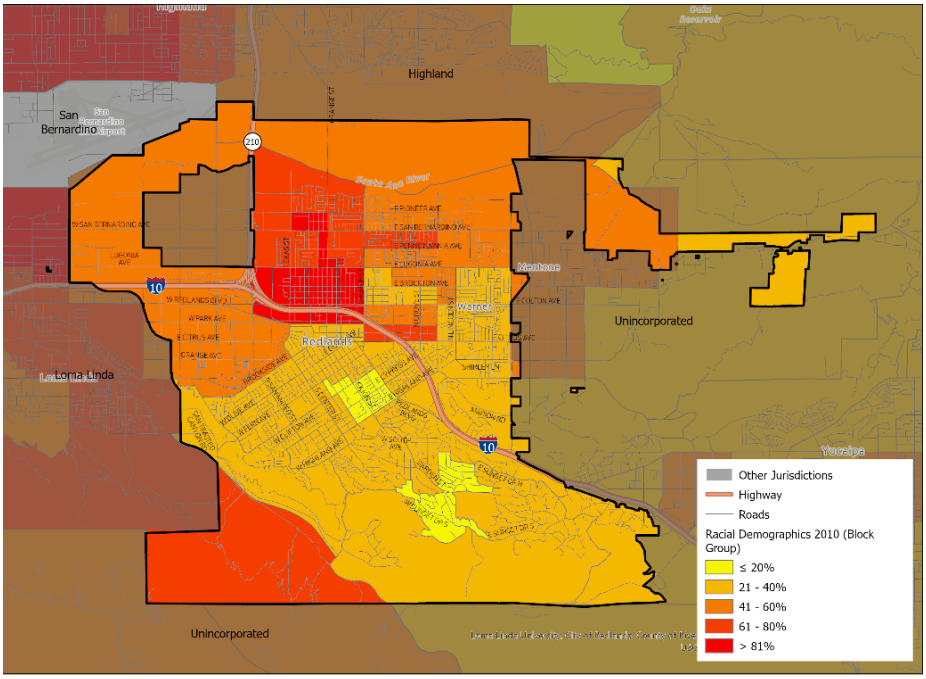
[22] San Bernardino County Analysis of Impediments to Fair Housing Choice, pg. 36: http://www.sbcounty.gov/uploads/cdh/reports/SanBernardinoCountyAI_Final_0410%20with%20Appendix.pdf.

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.

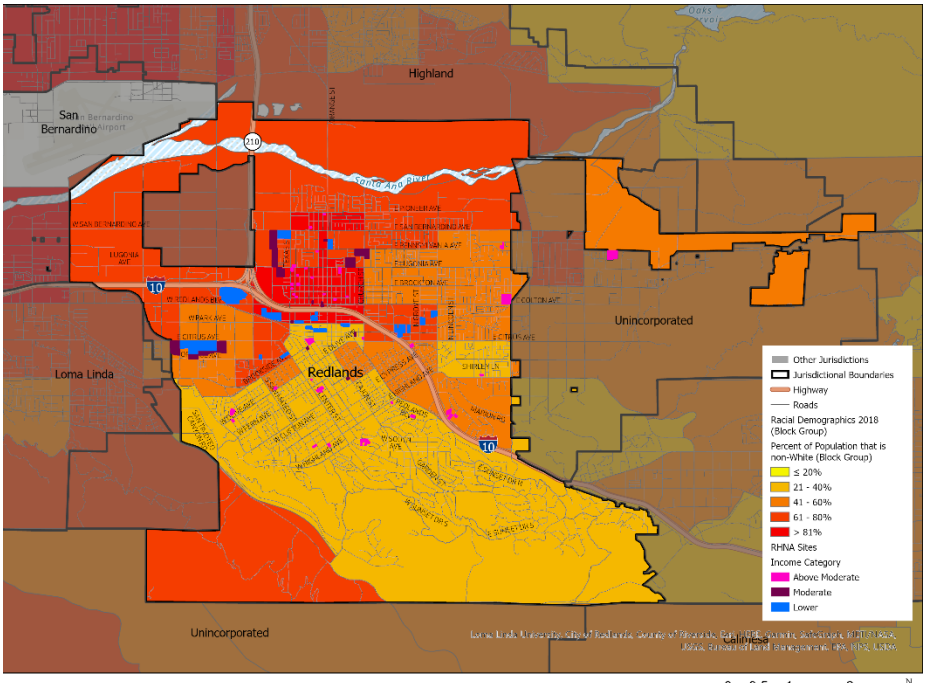
[23] San Bernardino County Analysis of Impediments to Fair Housing Choice: http://www.sbcounty.gov/uploads/cdh/reports/SanBernardinoCountyAI_Final_0410%20with%20Appendix.pdf.

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



Percent non-White, 2010

0 0.5 1 2 Miles



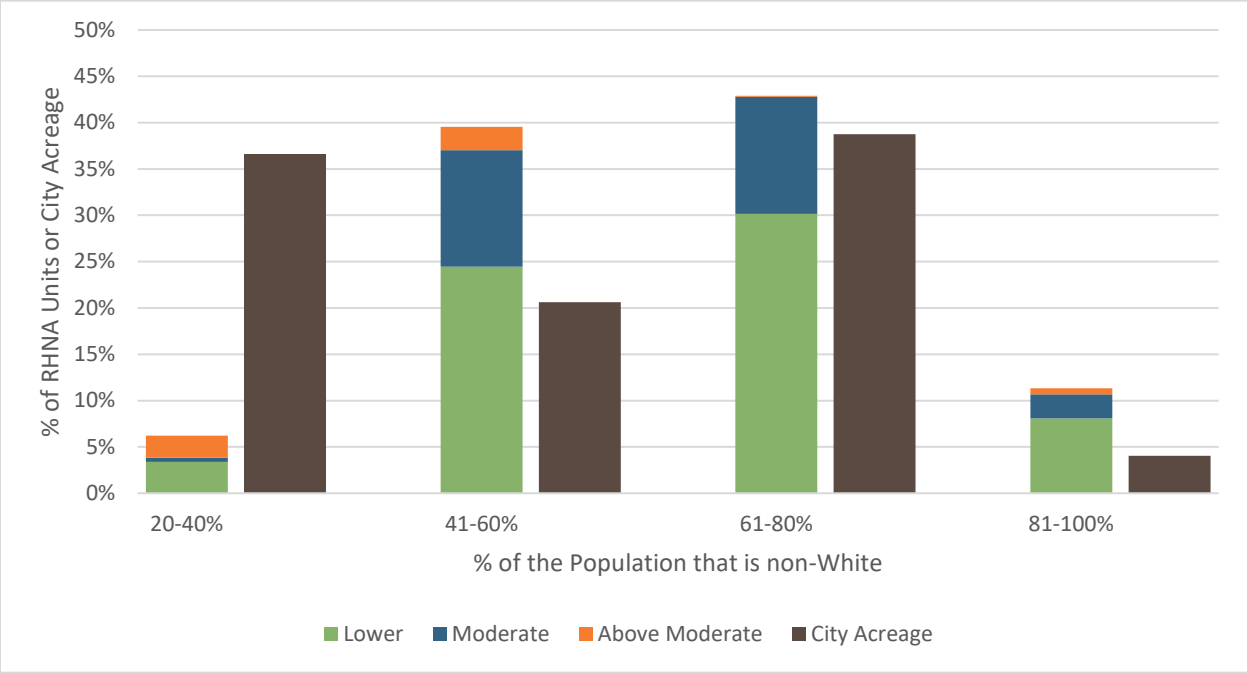
RHNA Sites and Percent non-White, 2018

0 0.5 1 2 Miles

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

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

- > 60: High Segregation

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).

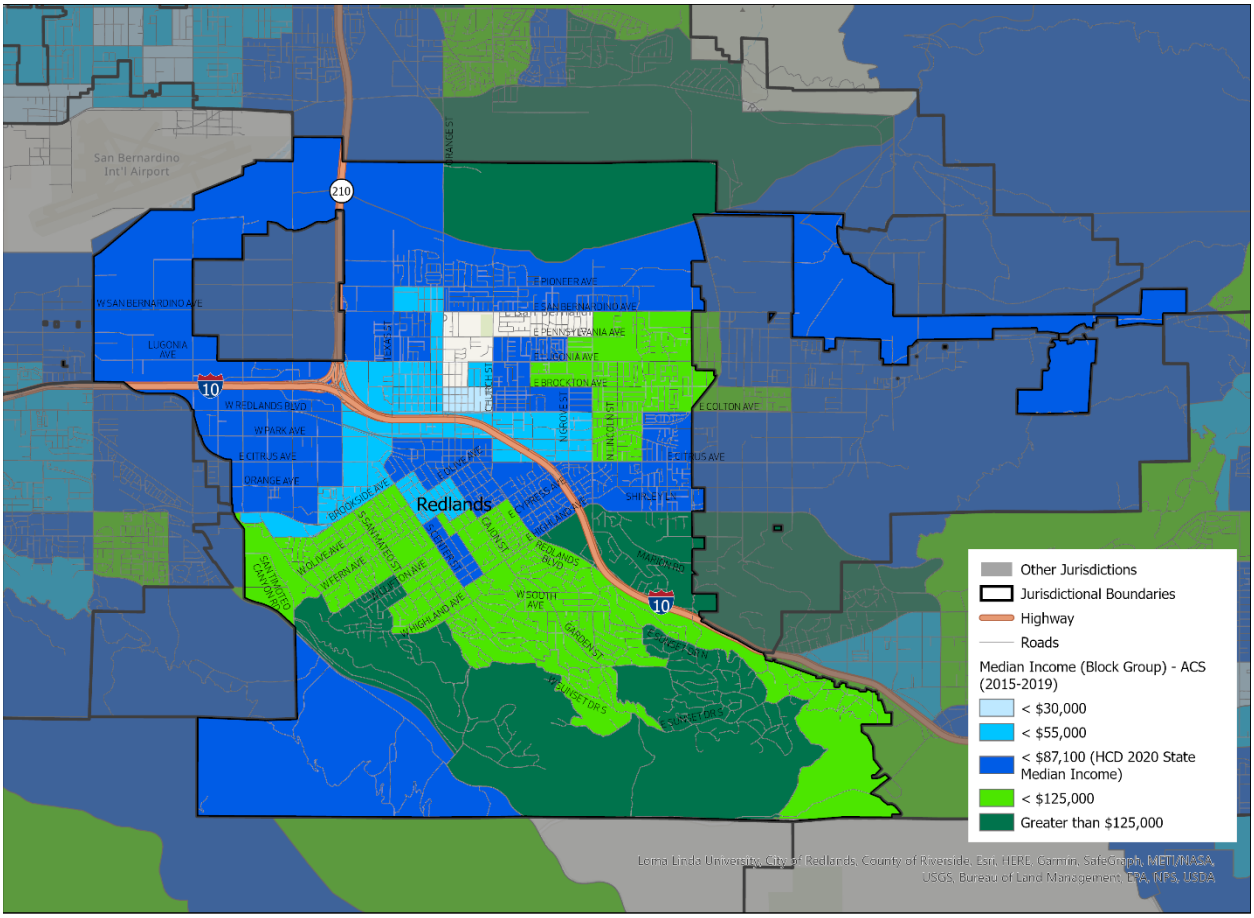
When comparing the Hispanic and White populations using the dissimilarity index, the result is a score of 39 in 2019, which is a moderate level of segregation. This result is explained by the existence of the high segregation and poverty neighborhood with a sizeable Hispanic majority in the northern 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

0 0.5 1 2 Miles

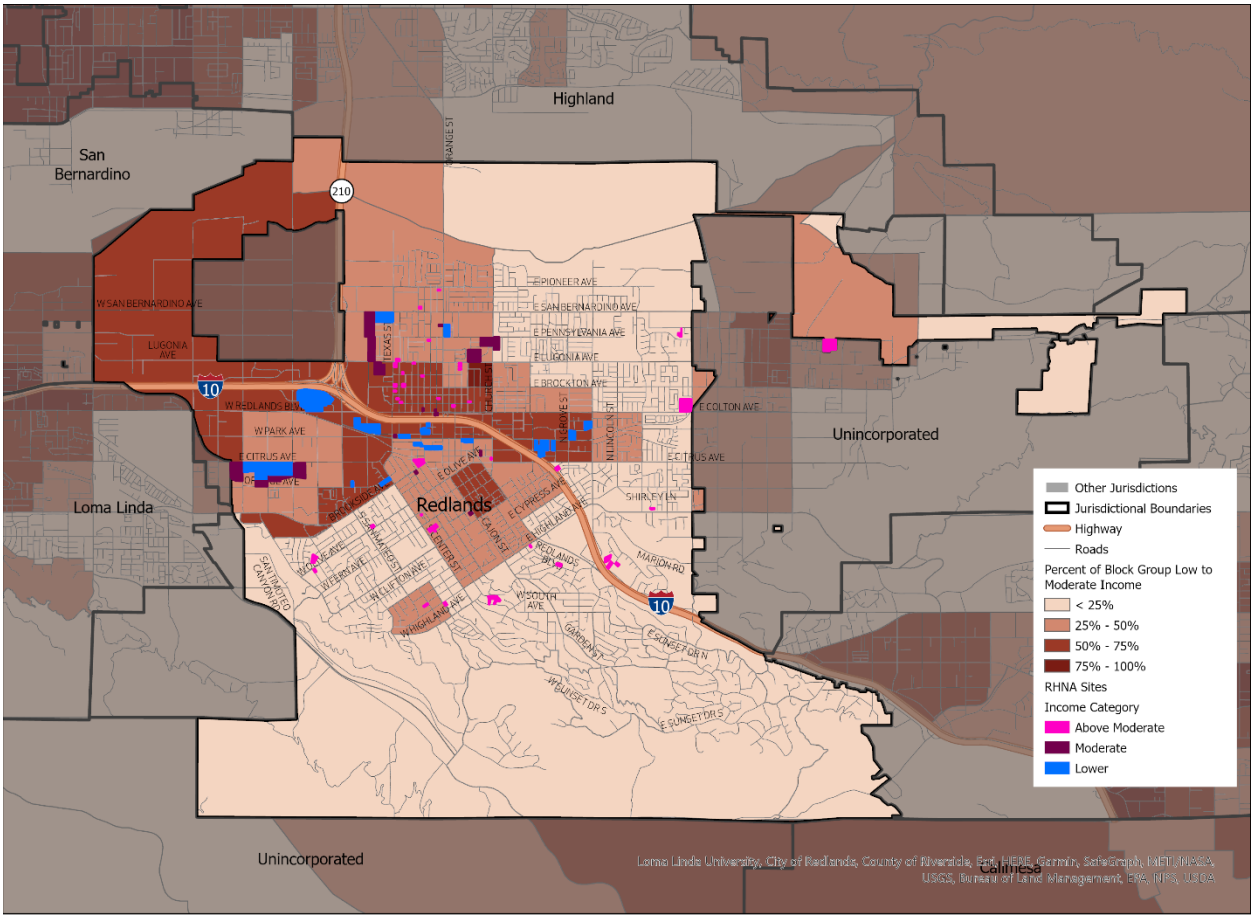
Figure 7-8 displays the RHNA sites by their income level and the percentage of residents in each census block group that falls into the low- and moderate-income category. The areas with the highest populations of low to moderate income have a variety of sites in each income category. The income groups 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)



RHNA Sites and Low-Moderate Income

0 0.5 1 2 Miles

Source: HCD AFFH Mapping Tool.

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

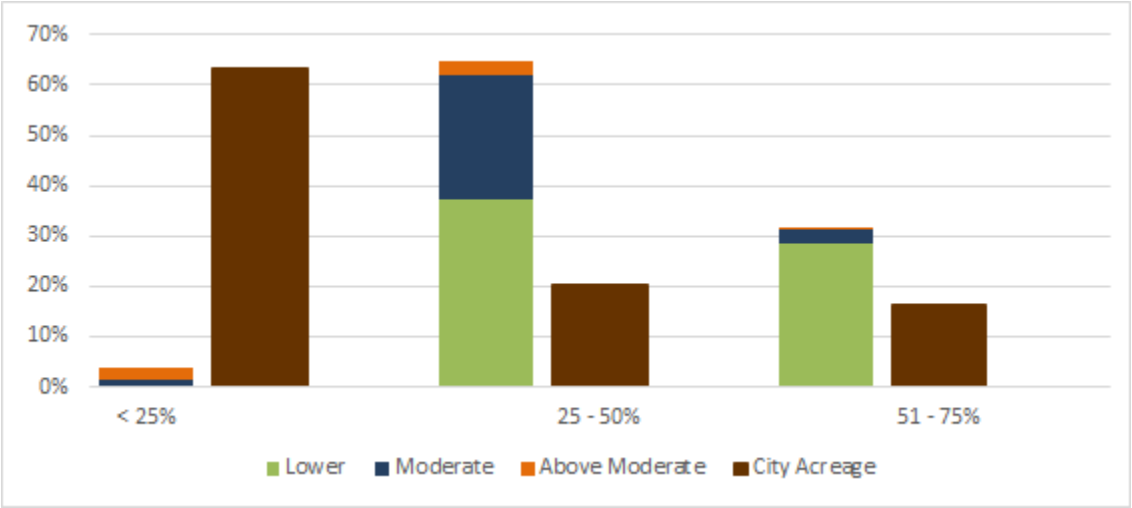
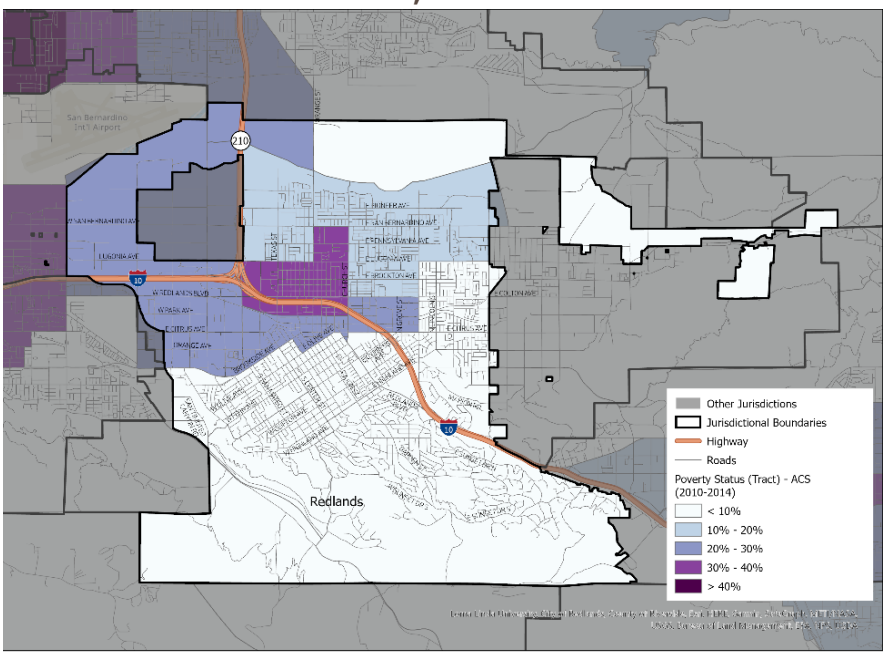


Figure 7-10 displays the percentage of households whose incomes are under the federal poverty level in each census tract from 2010-2014 and 2015-2019. Redlands has low levels of poverty throughout the City except in the central census tract, which has poverty levels from 30 percent to 40 percent. In 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.

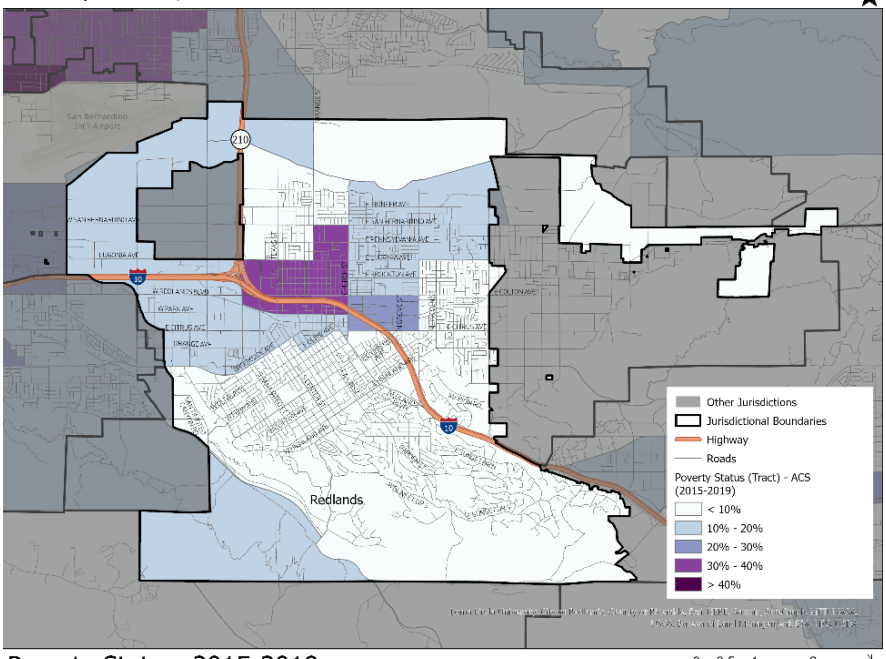
While increasing lower-income housing in the southern areas of the City would lower the dissimilarity index, the southern, suburban area of the City is not the most accessible place for low income or

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.

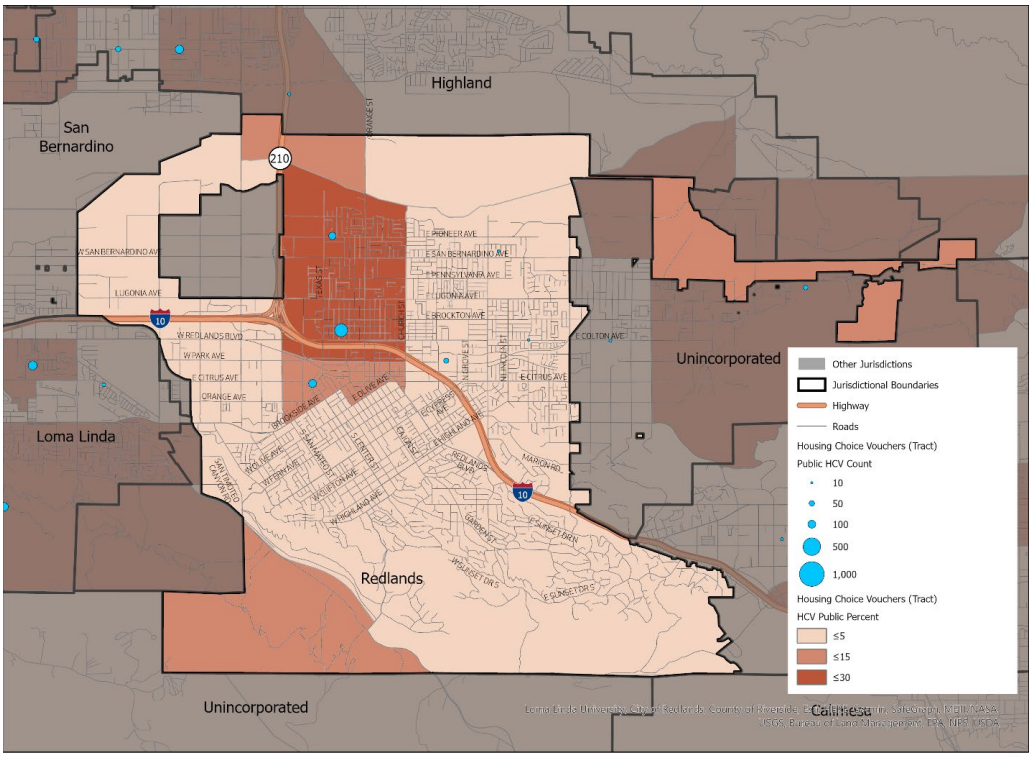
The housing choice voucher program is the federal program for assisting very low-income, elderly, and disabled families and individuals in affording decent housing by subsidizing rent costs and paying landlords directly for a portion of the rent. Eligibility is based on family size and whether income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



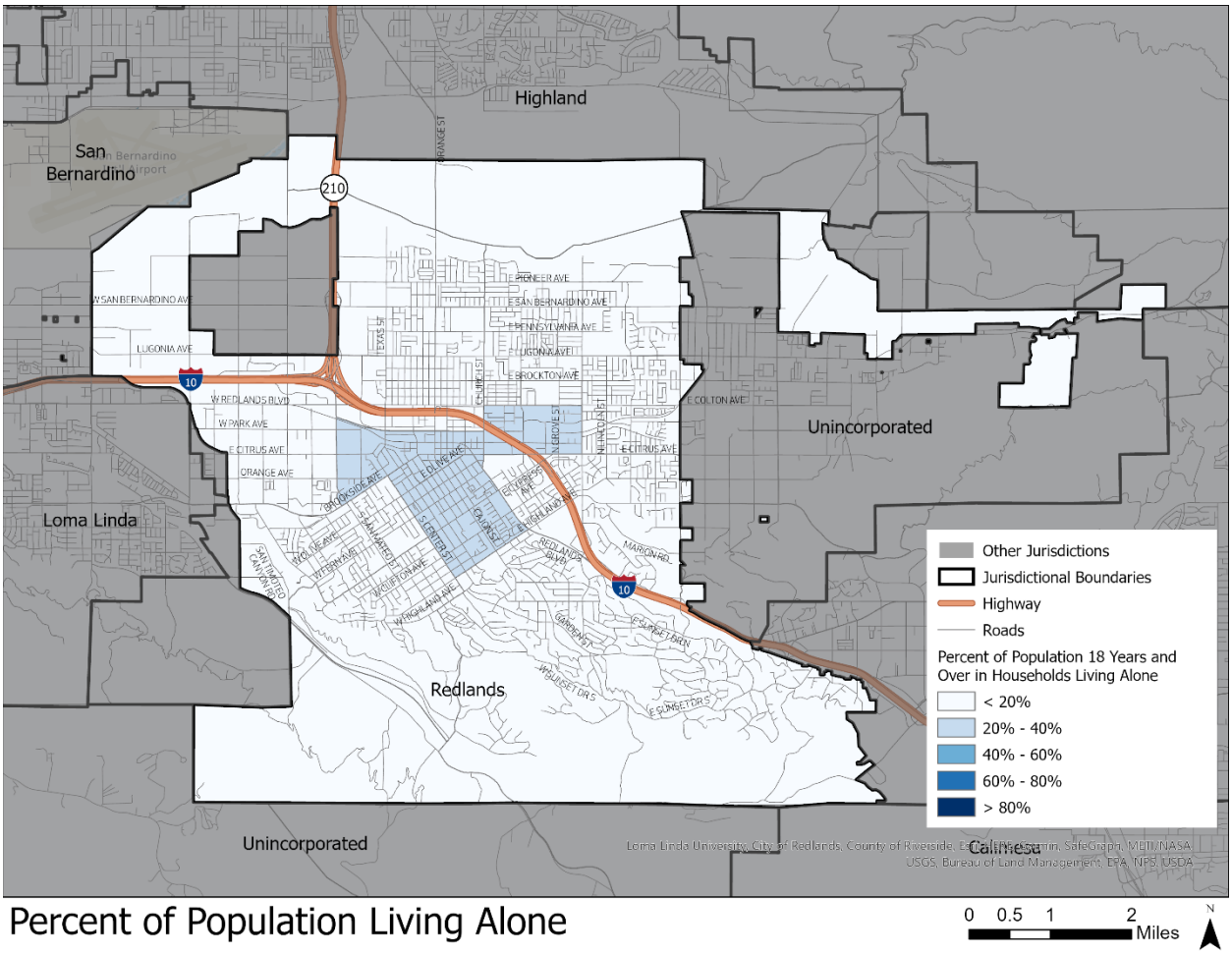
Housing Choice Vouchers

0 0.5 1 2 Miles

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.

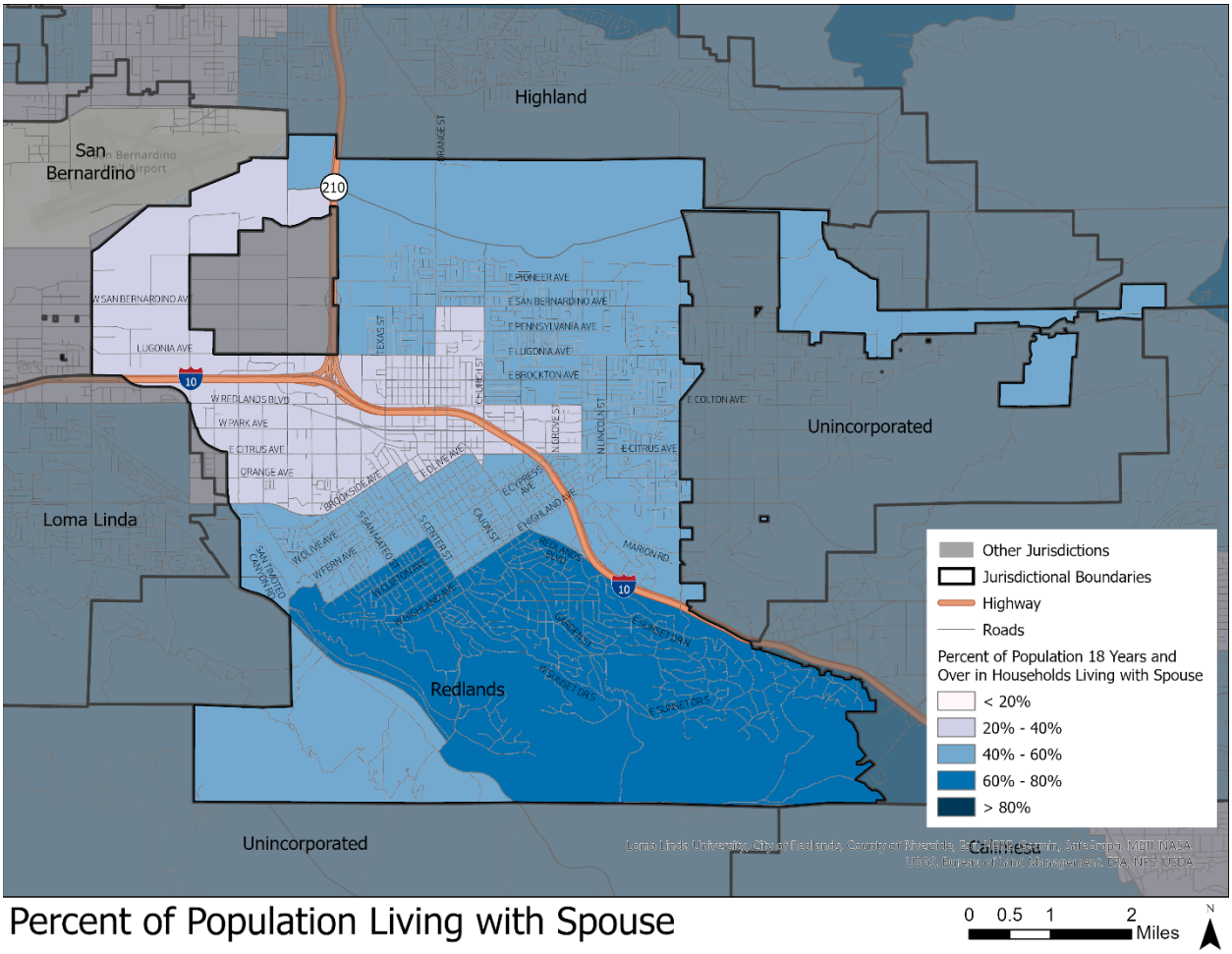
FIGURE 7-12: PERCENTAGE OF ADULTS LIVING ALONE, 2015-2019 REDLANDS



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.

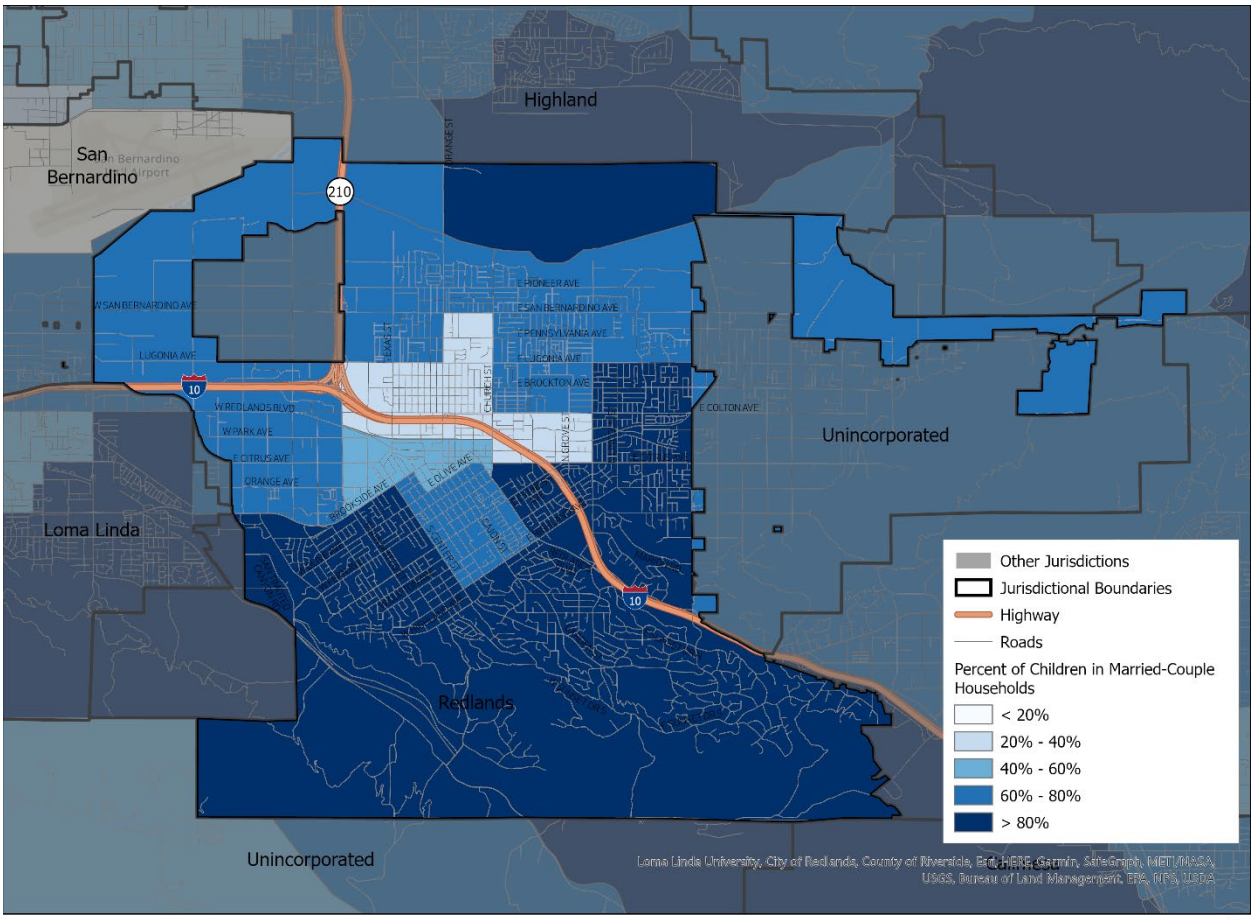
Compared to the region as a whole, the majority of the City matches trends in surrounding cities where in the majority of the area about 40–60 percent of adults live with a spouse, with some sparse neighborhoods where under 40 percent live with a spouse. The southeast portion of Redlands stands out in 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.

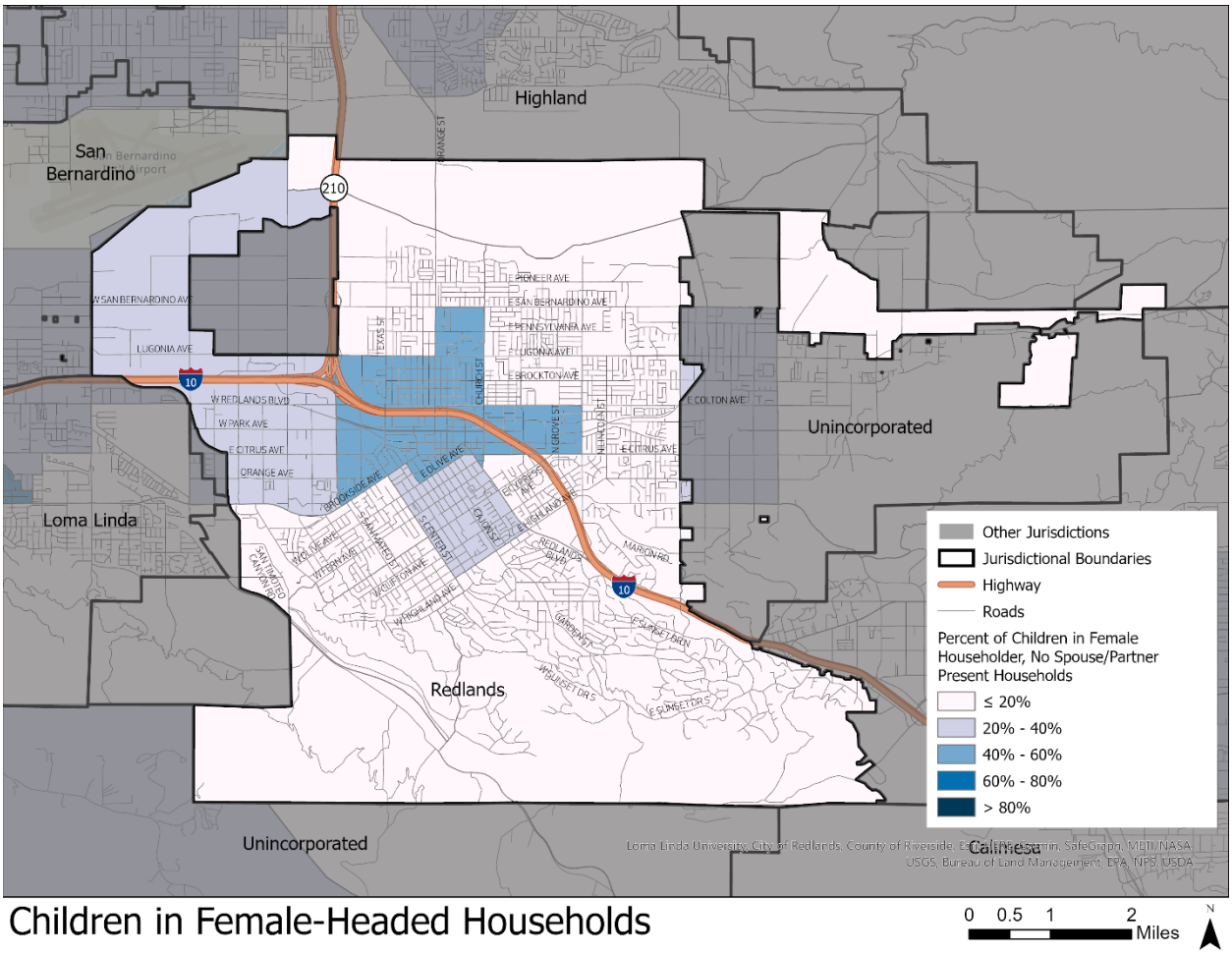
FIGURE 7-14: PERCENTAGE OF CHILDREN IN MARRIED-COUPLE HOUSEHOLDS, 2015-2019, REDLANDS



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.

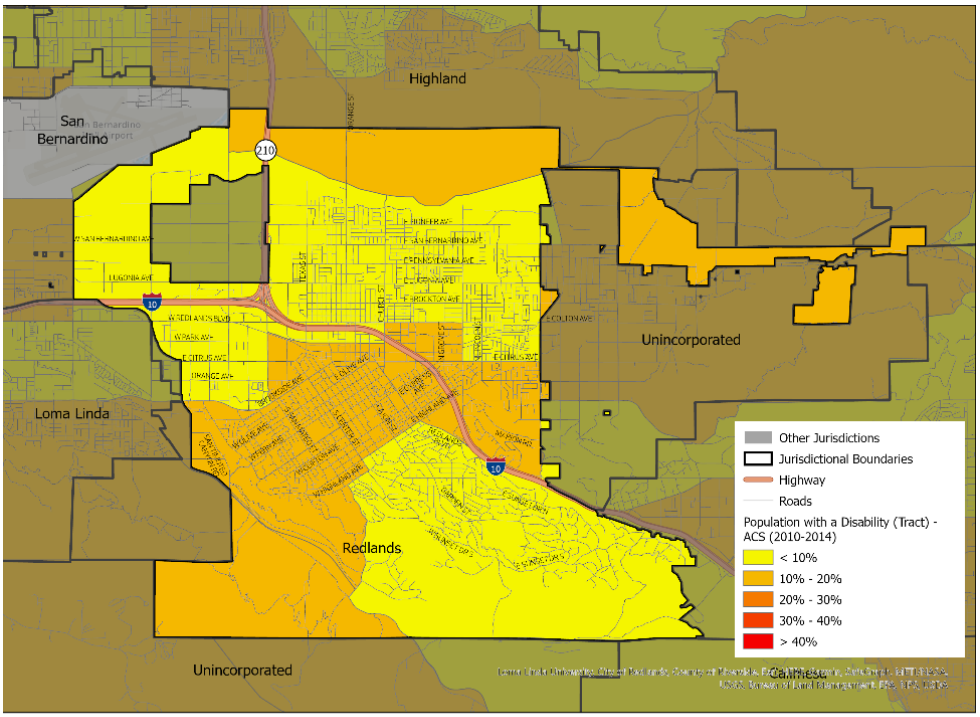
TABLE 7-3: DISABILITY CHARACTERISTICS

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.

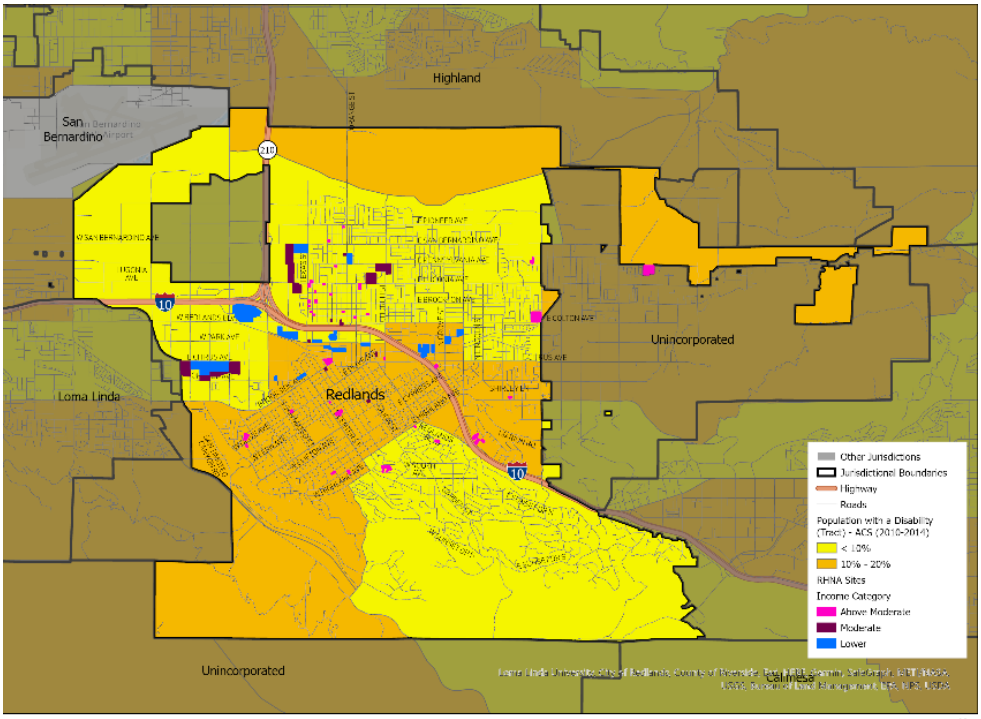
An equitable distribution of health-oriented community facilities and services, including recreation centers, medical facilities, and youth centers, helps ensure the well-being of residents. Figure 7-16 shows the RHNA sites and a relatively equal distribution across the City of individuals with disabilities.

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



Population with a Disability, 2010-2014

0 0.5 1 2 Miles



RHNA Sites and Population with a Disability, 2015 - 2019

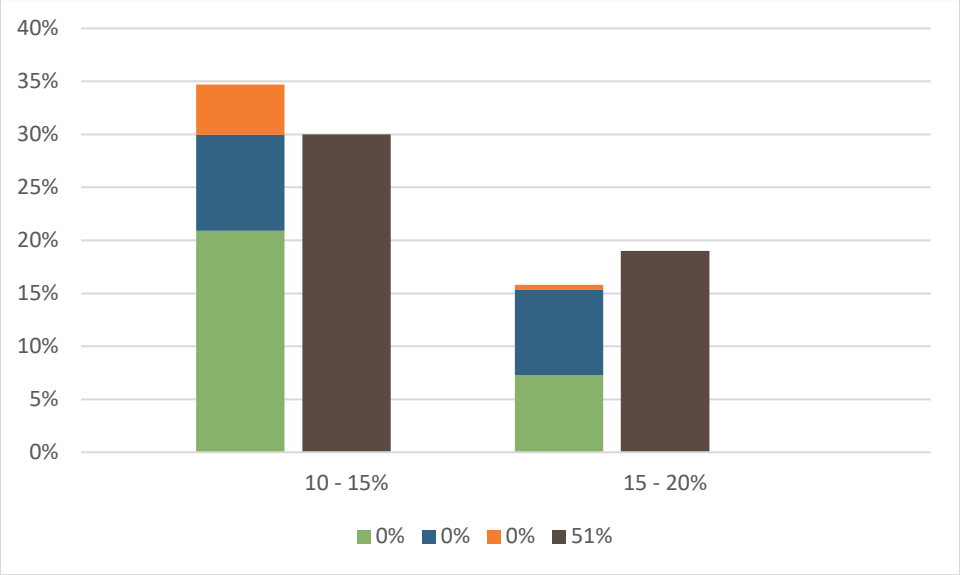
0 0.5 1 2 Miles

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

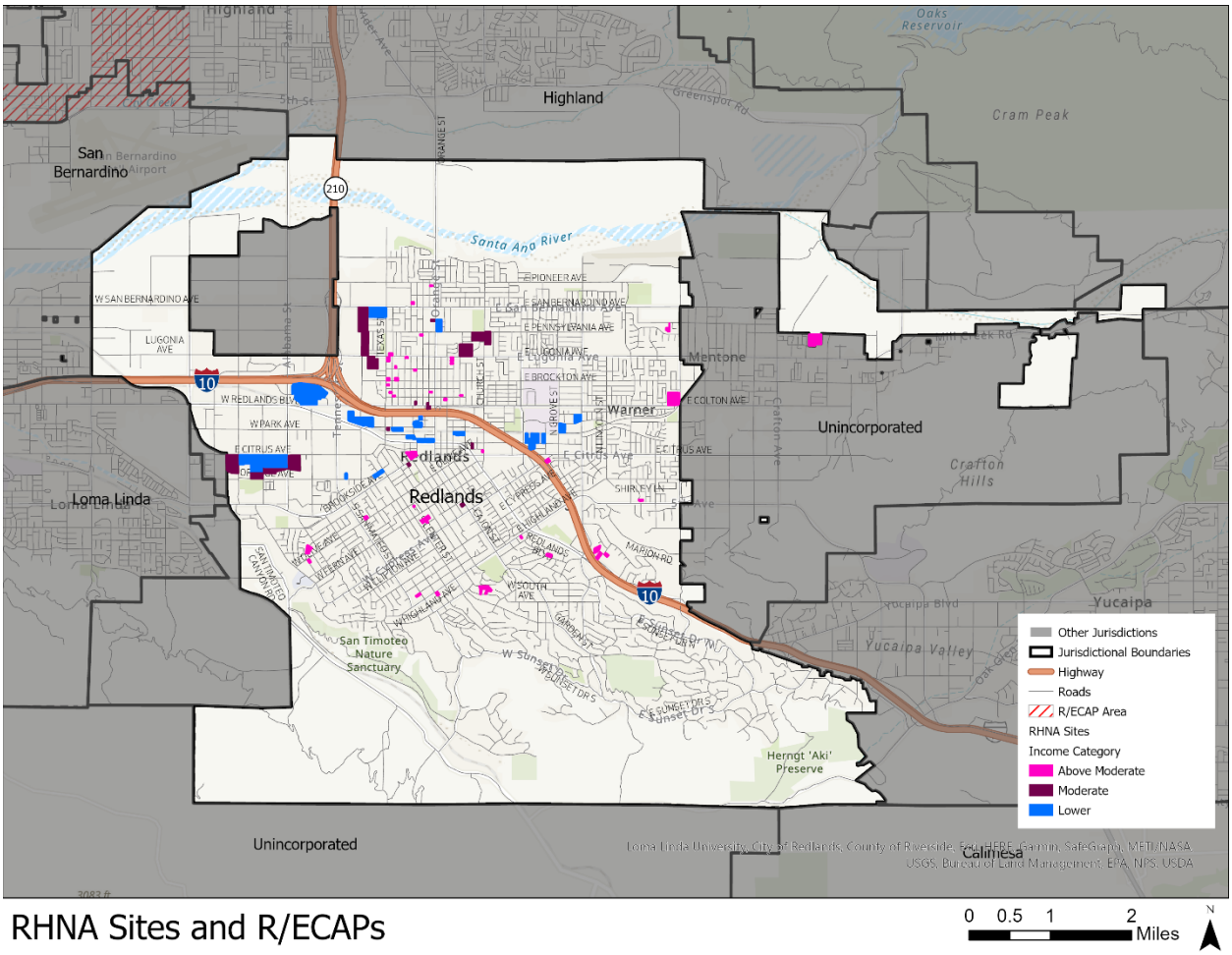
7.3.4 Racially & Ethnically Concentrated Areas of Poverty and Racially Concentrated Areas of Affluence

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)



RHNA Sites and R/ECAPs

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.

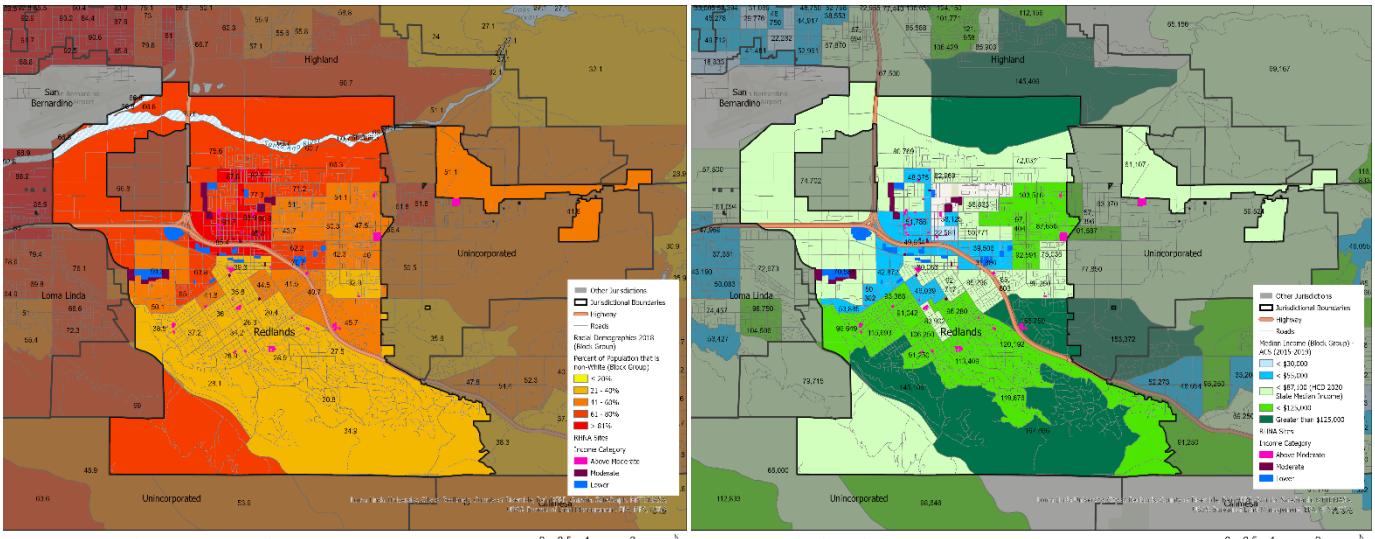
The area around the Redlands Country Club in the southeast portion of the City is trends the closest to an RCAA, with a median household income level over $125,000 and a White population between 60 percent and 79 percent. Large parts of the southernmost areas of Redlands consist of agriculture zoning. 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



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.

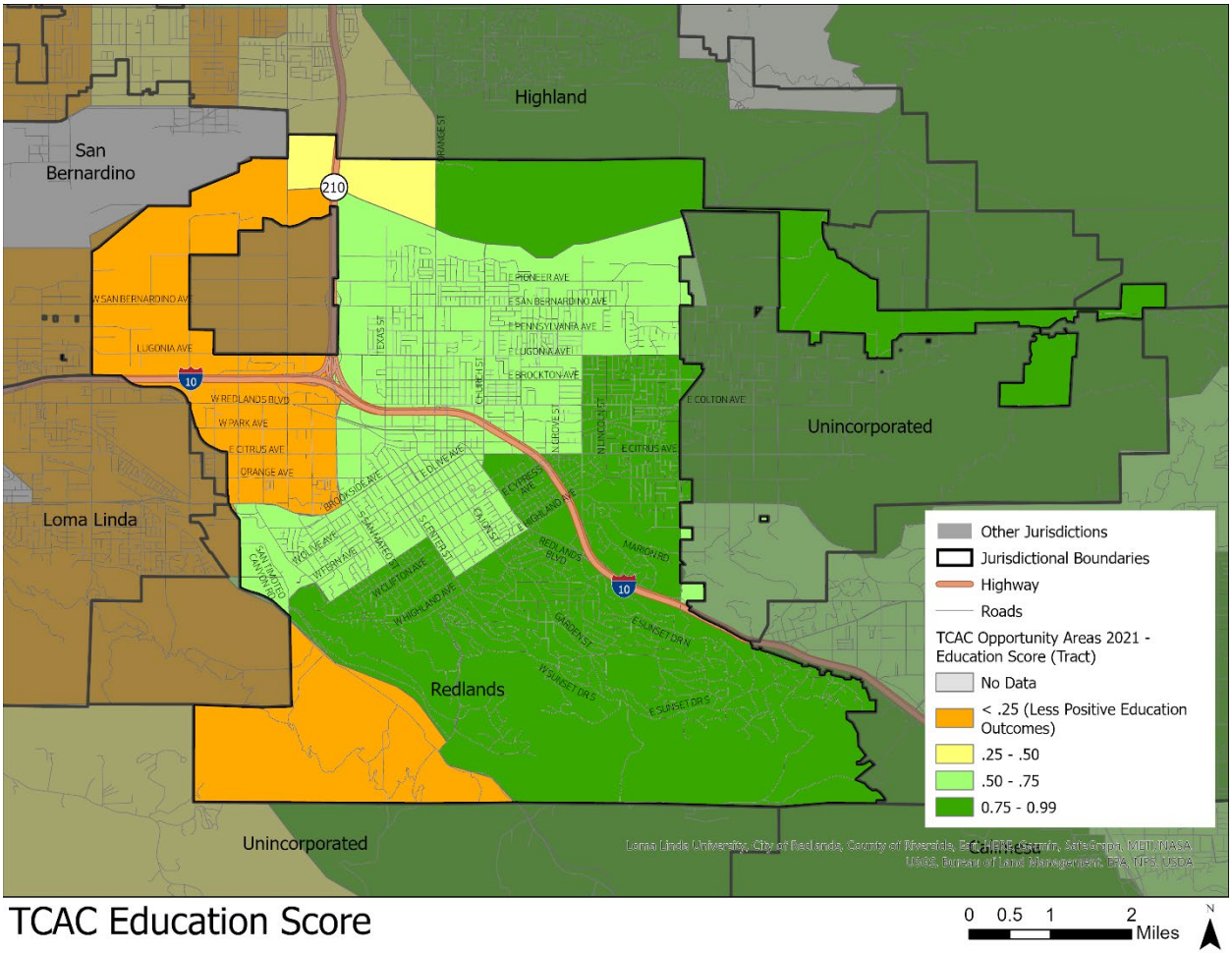
Education

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

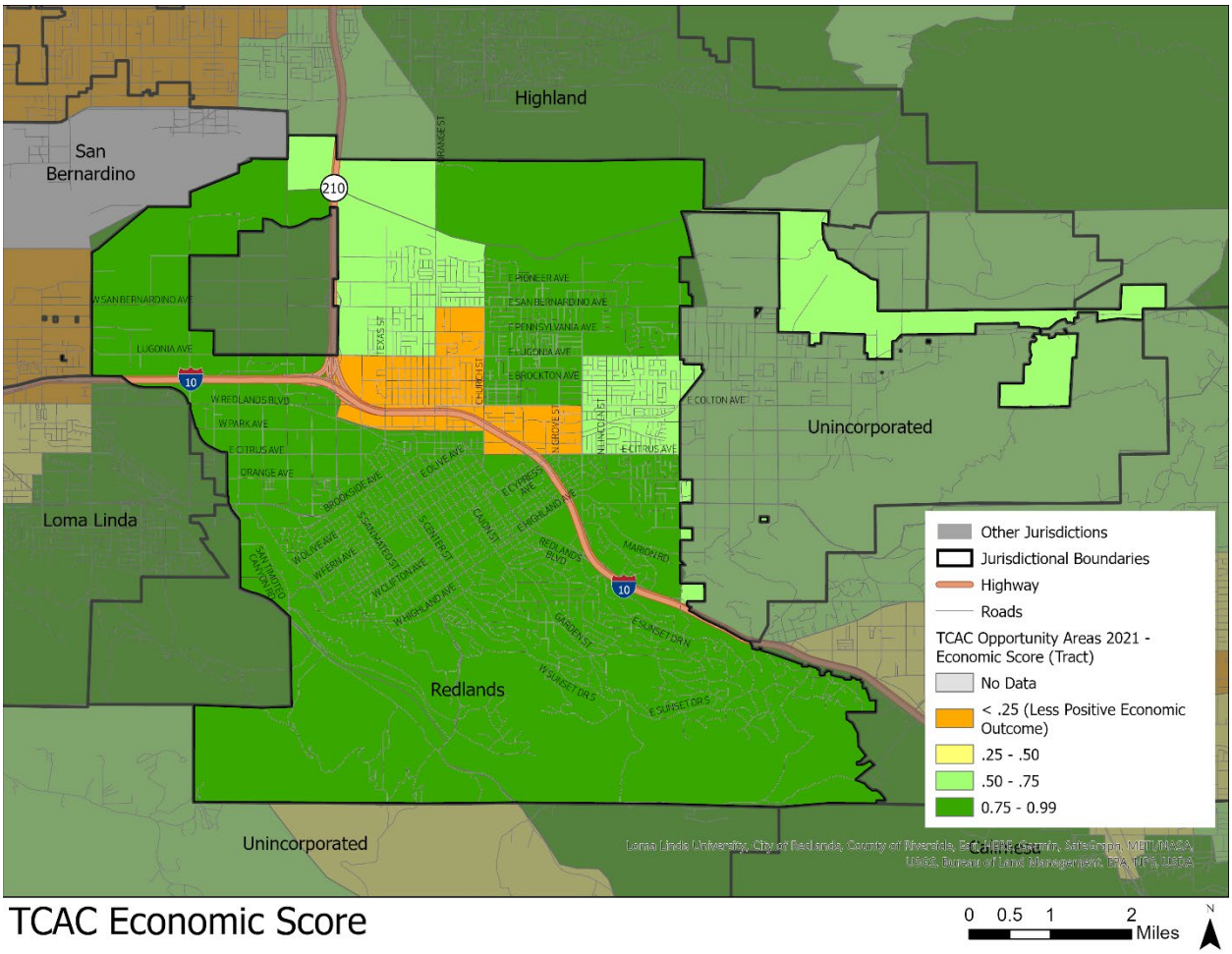
Economic indicators for TCAC scores include poverty, adult education, job proximity, employment, and median home values. The economic scores for Redlands are shown in Figure 7-21. All of Redlands has a generally positive economic outcome score except for two census tracts in the center of the City. These 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

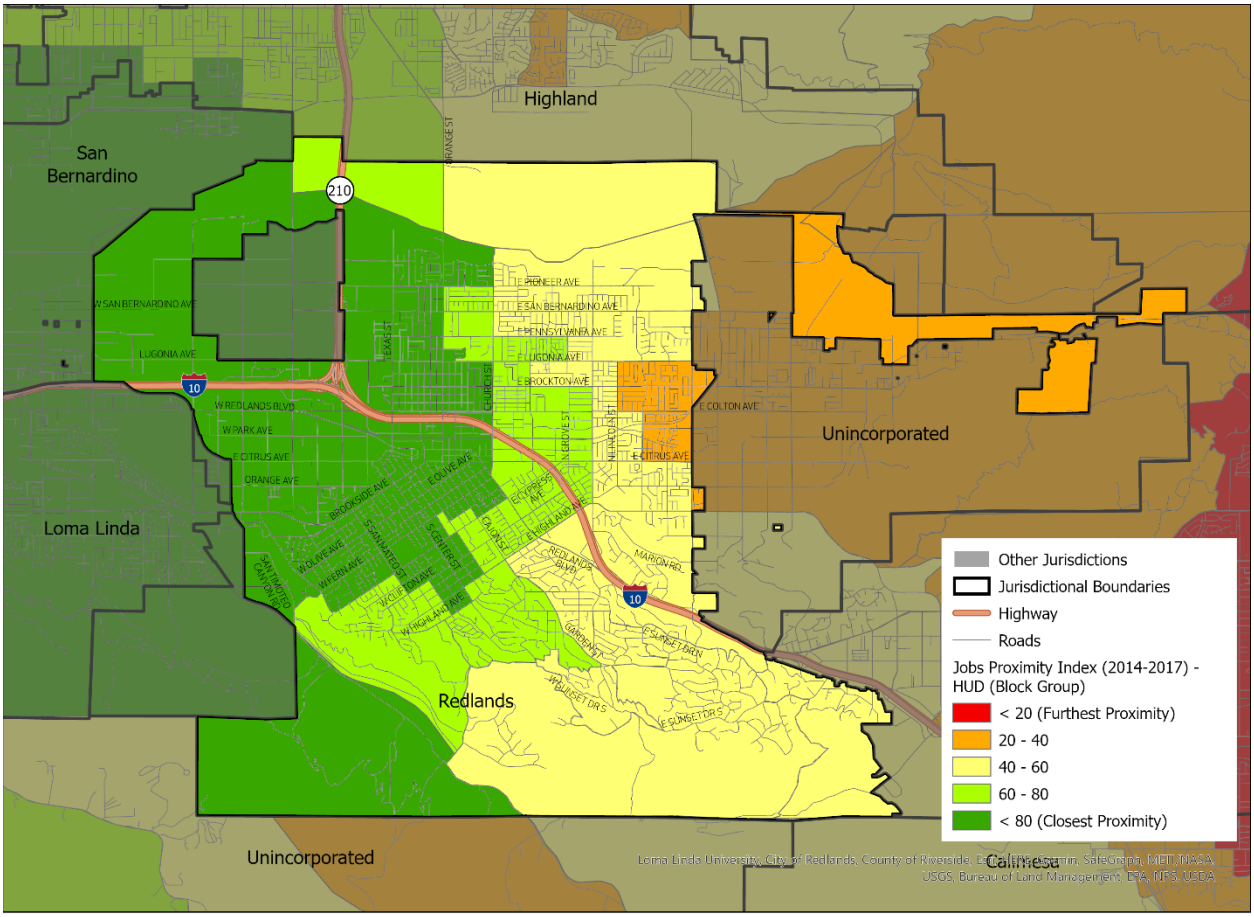
The areas with the lowest median household incomes and highest percentage of non-White population have the closest proximity to jobs and employment, as shown by Figure 7-22, while the wealthier, more suburban areas have the lowest proximity in the City. This implies there is not much disparity in access to

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

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

0 0.5 1 2 Miles

Source: HCD AFFH Mapping Tool.

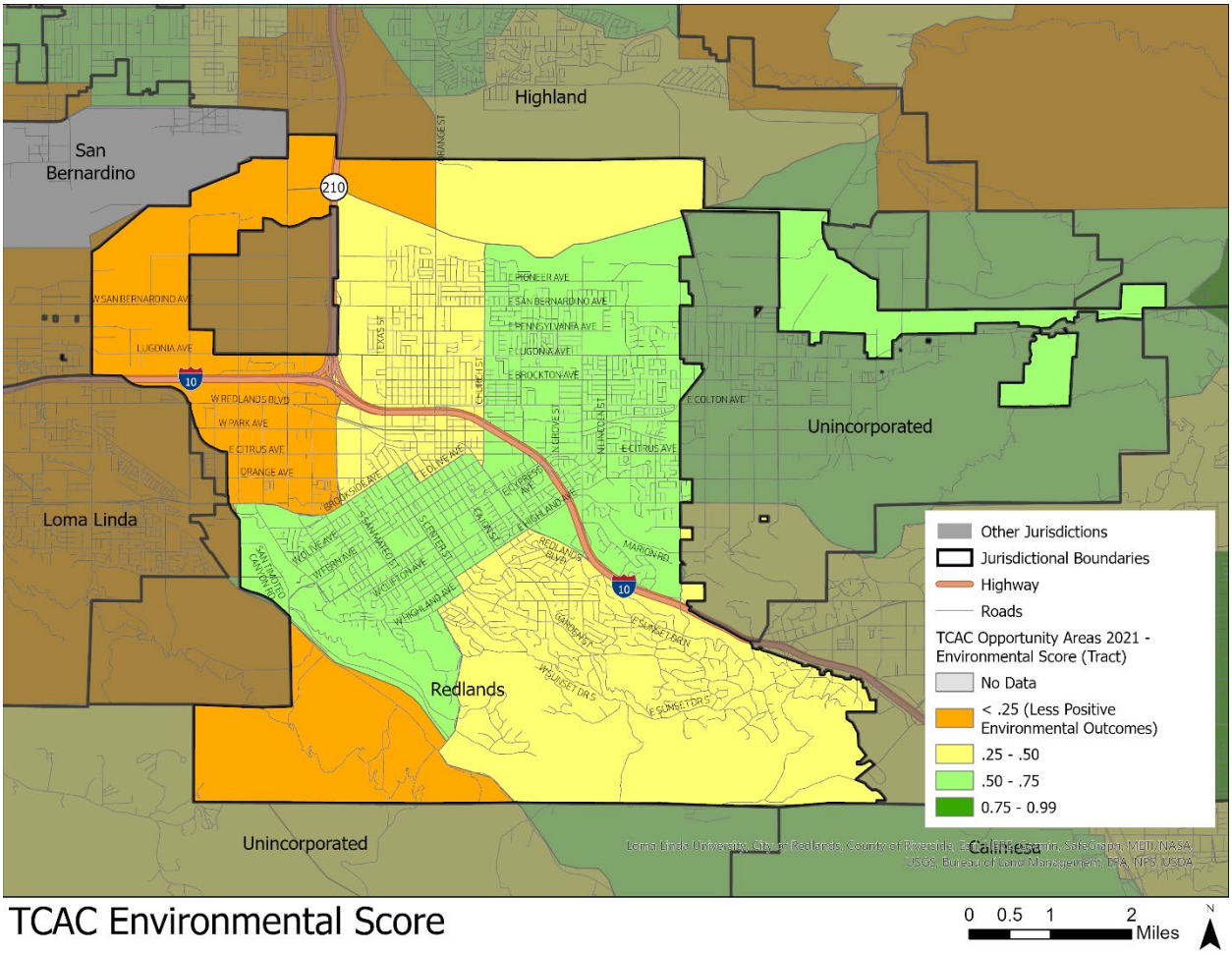
Environmental

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.

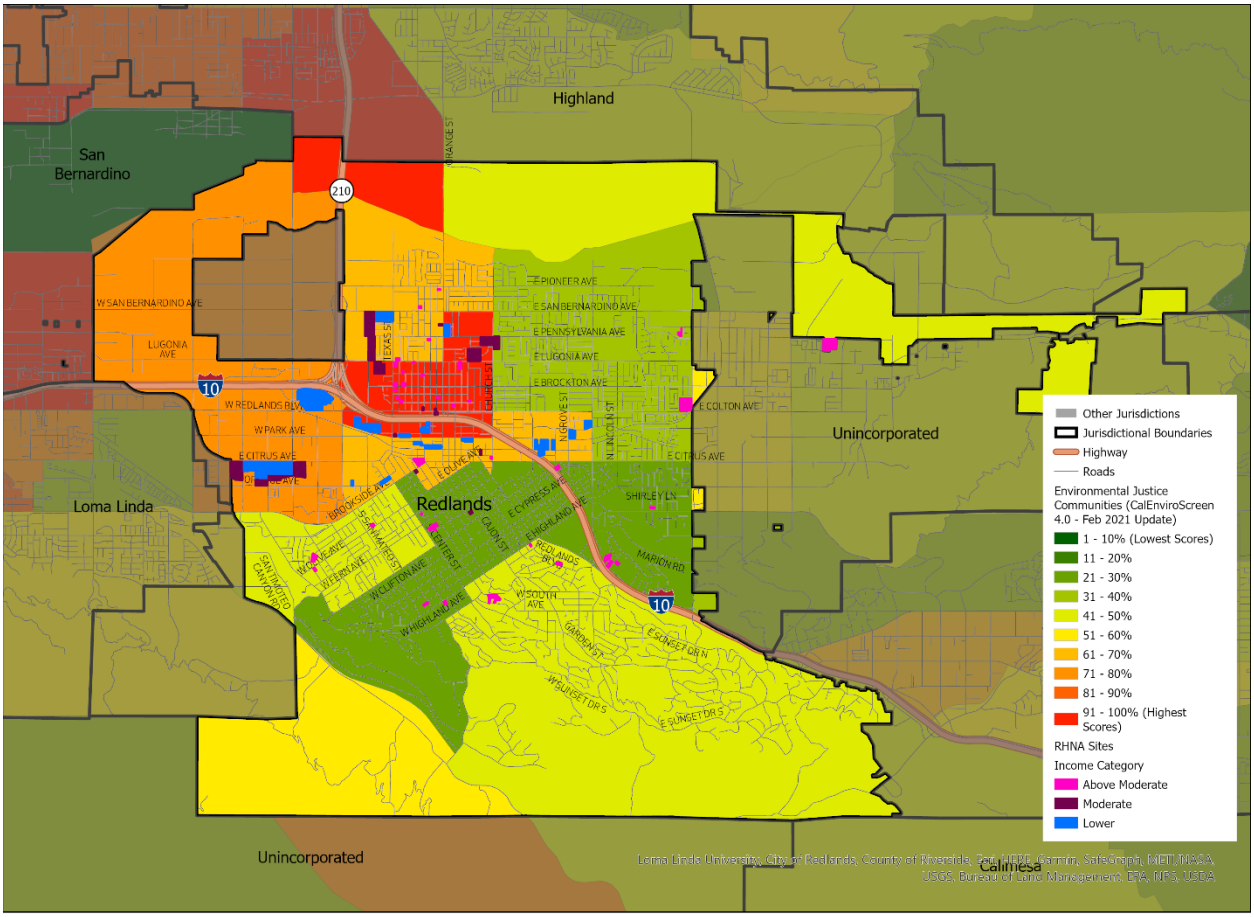
In recent years, the City has required air quality and health risk assessments be prepared for residential or educational facility projects within 500 feet of major arterials, highways, or interstates. In these scenarios, the City has required high efficiency particulate air filters with a Minimum Efficiency 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)

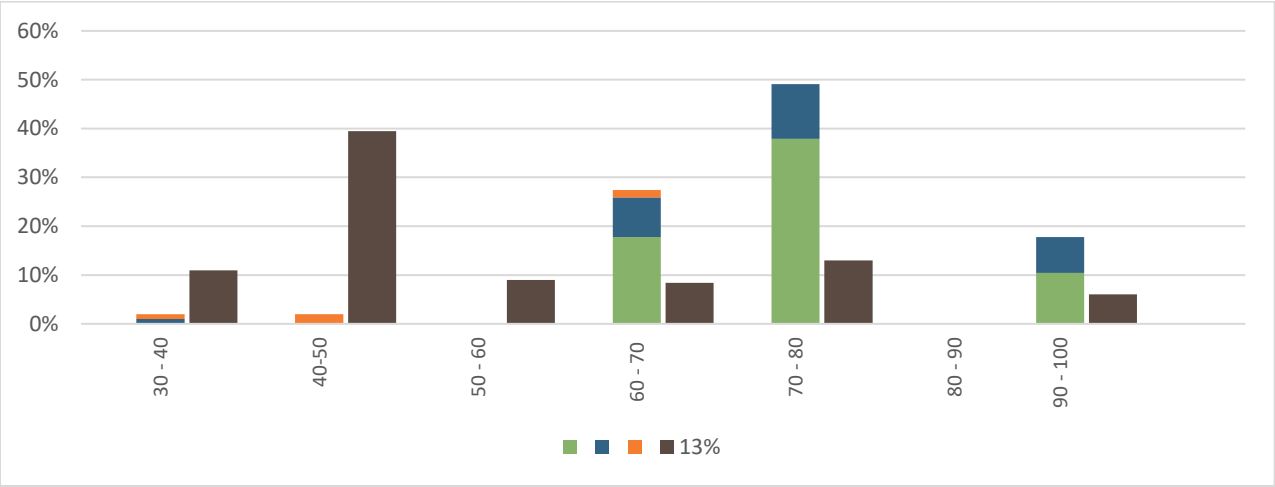


RHNA Sites and CES 4.0 Percentile Scores

0 0.5 1 2 Miles

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

Census Tract	Population	Cal Enviro Score Percentile	Pollution Percentile	Poverty Percentile	Traffic Percentile	Opportunity Category
6071007800	4912	73.2	95.0	58.4	81.0	Low Resource
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.

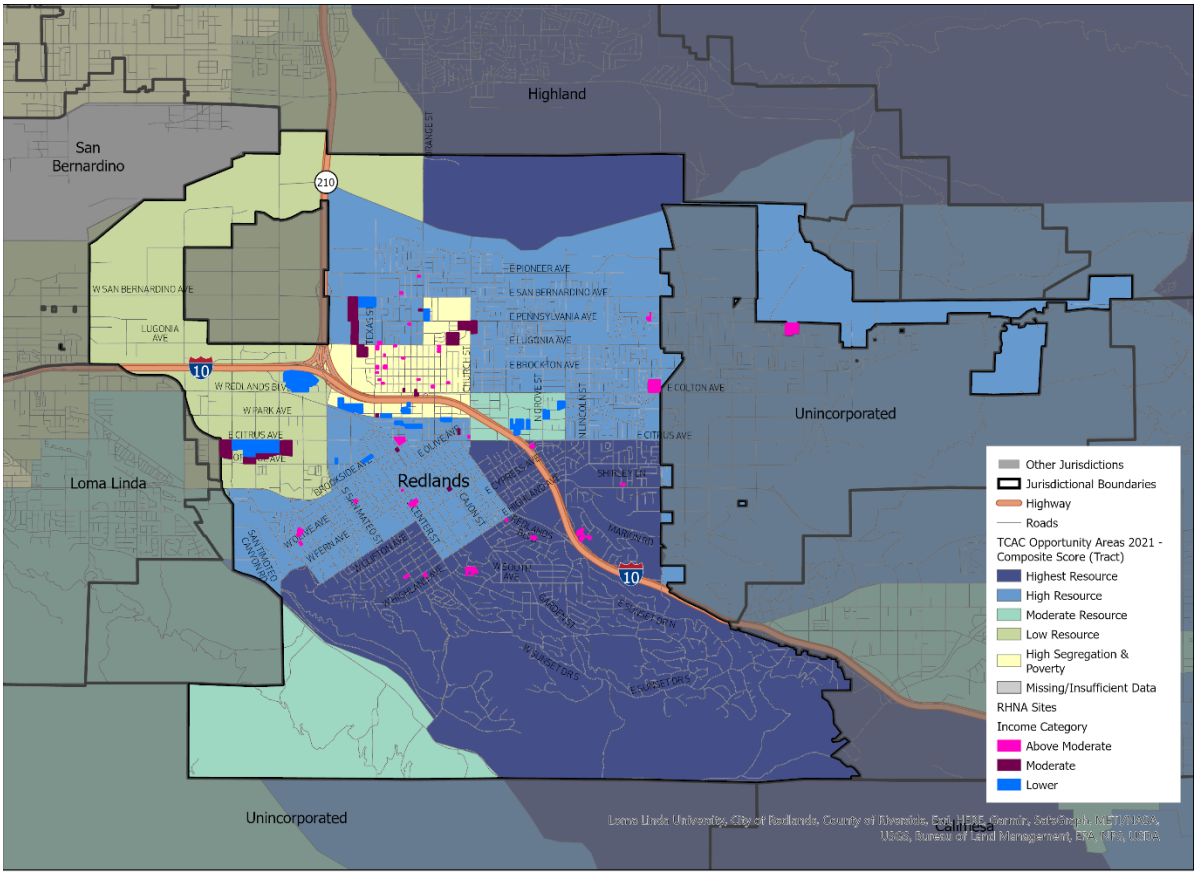
The City has prepared a draft Transit Villages Specific Plan (TVSP) that is currently undergoing environmental review and is anticipated to be heard for adoption in mid-2022. The TVSP would establish a policy environment promoting transit-oriented development (TOD) around three Metrolink / Arrow

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)

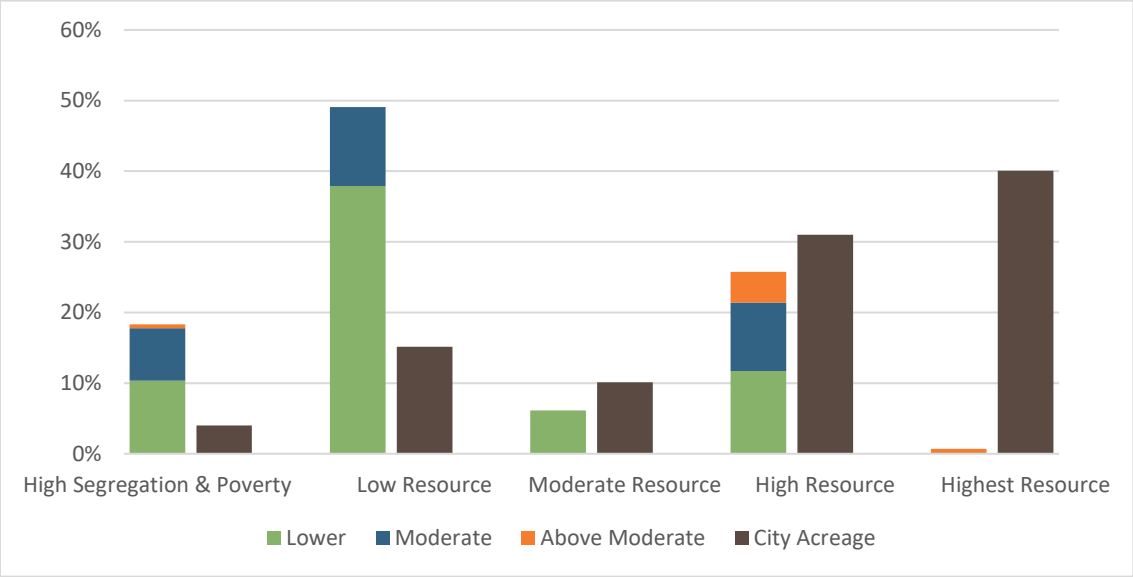


RHNA Sites and TCAC Composite Score

0 0.5 1 2 Miles

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

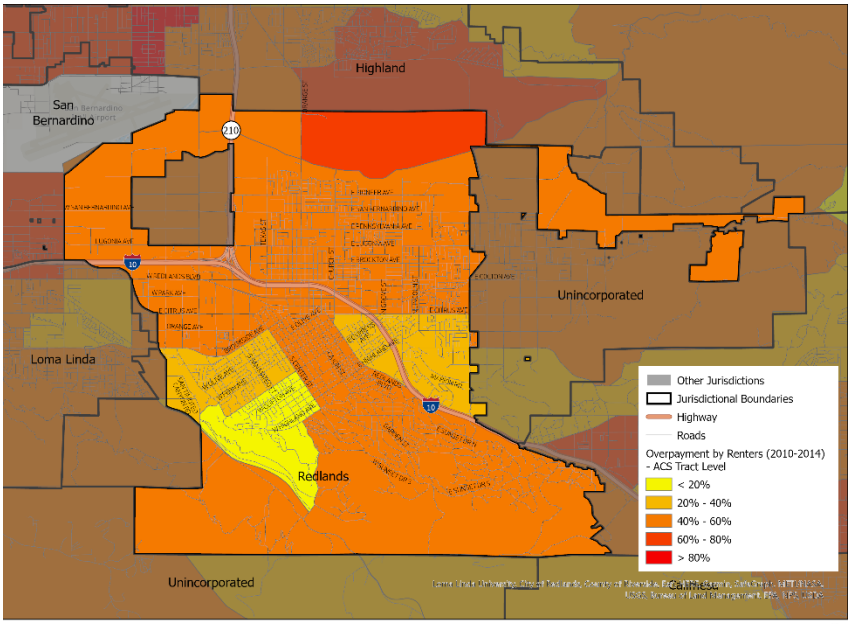
	Elderly Renters with Housing Problem	Elderly Owners with Housing Problem	All Elderly Households with Housing Problems	Total Elderly Households	Large HH Renters with Housing Problem	Large HH Owners with Housing Problem	All Large Households with Housing Problems	Total Large Households
City	1,170	1,780	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.

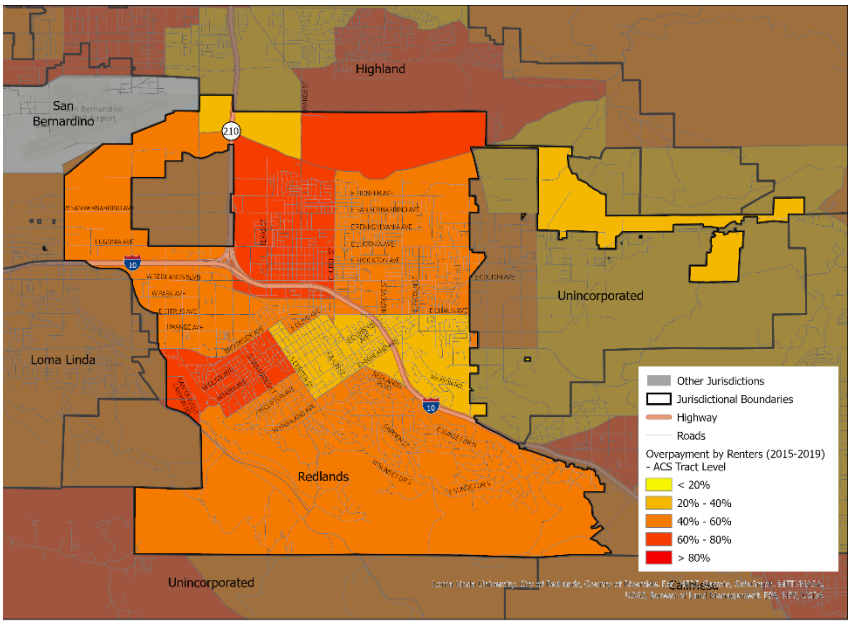
7.3.6.2 Cost Burden

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

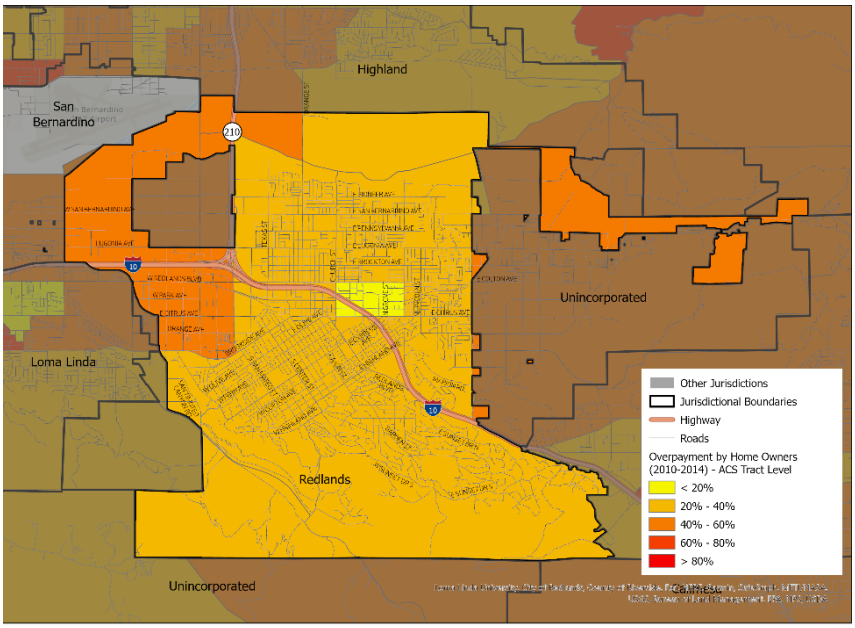


Overpayment by Renters, 2015-2019

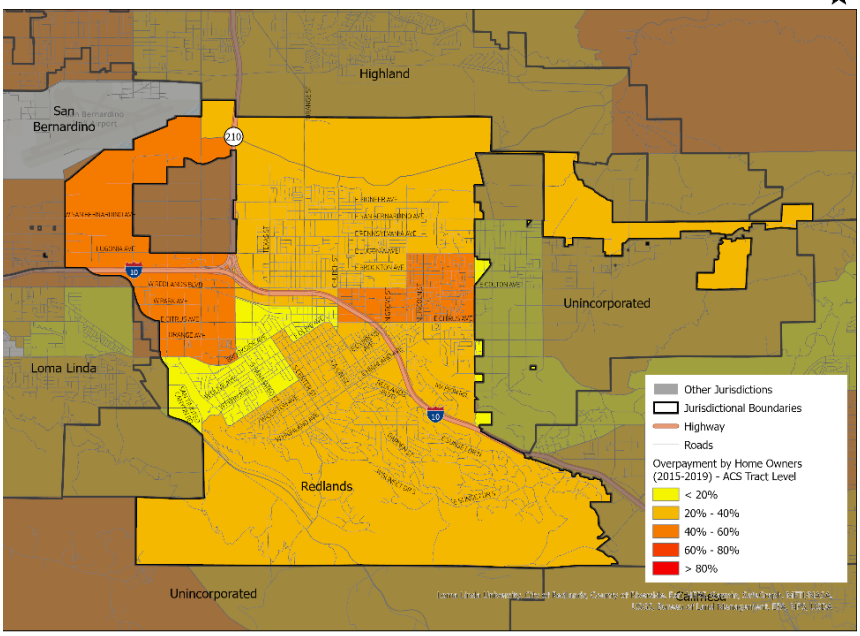
Source: HCD AFFH Mapping Tool.

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.

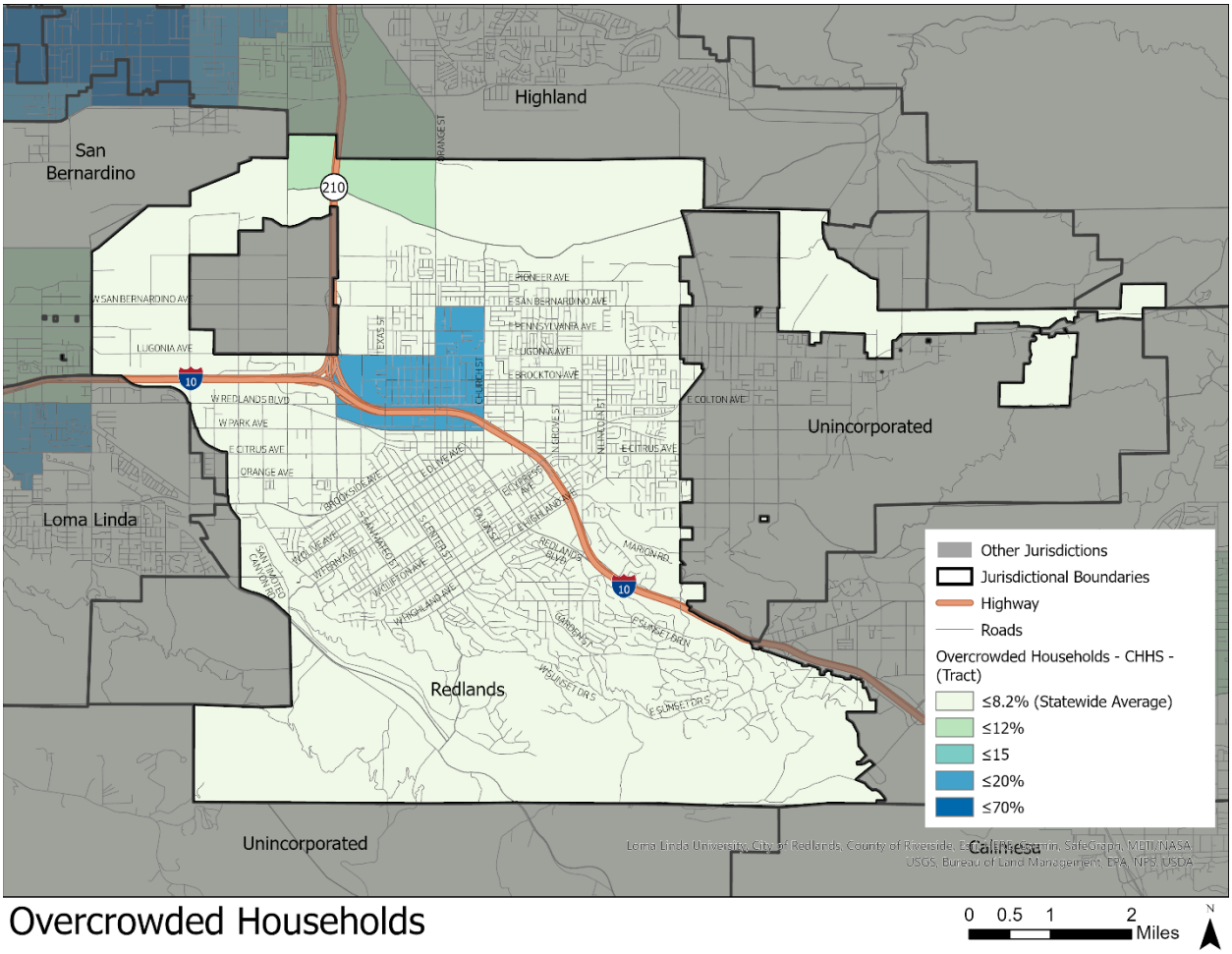
7.3.6.3 Overcrowding

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.

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

[28] UCB Sensitive Communities Project.

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.

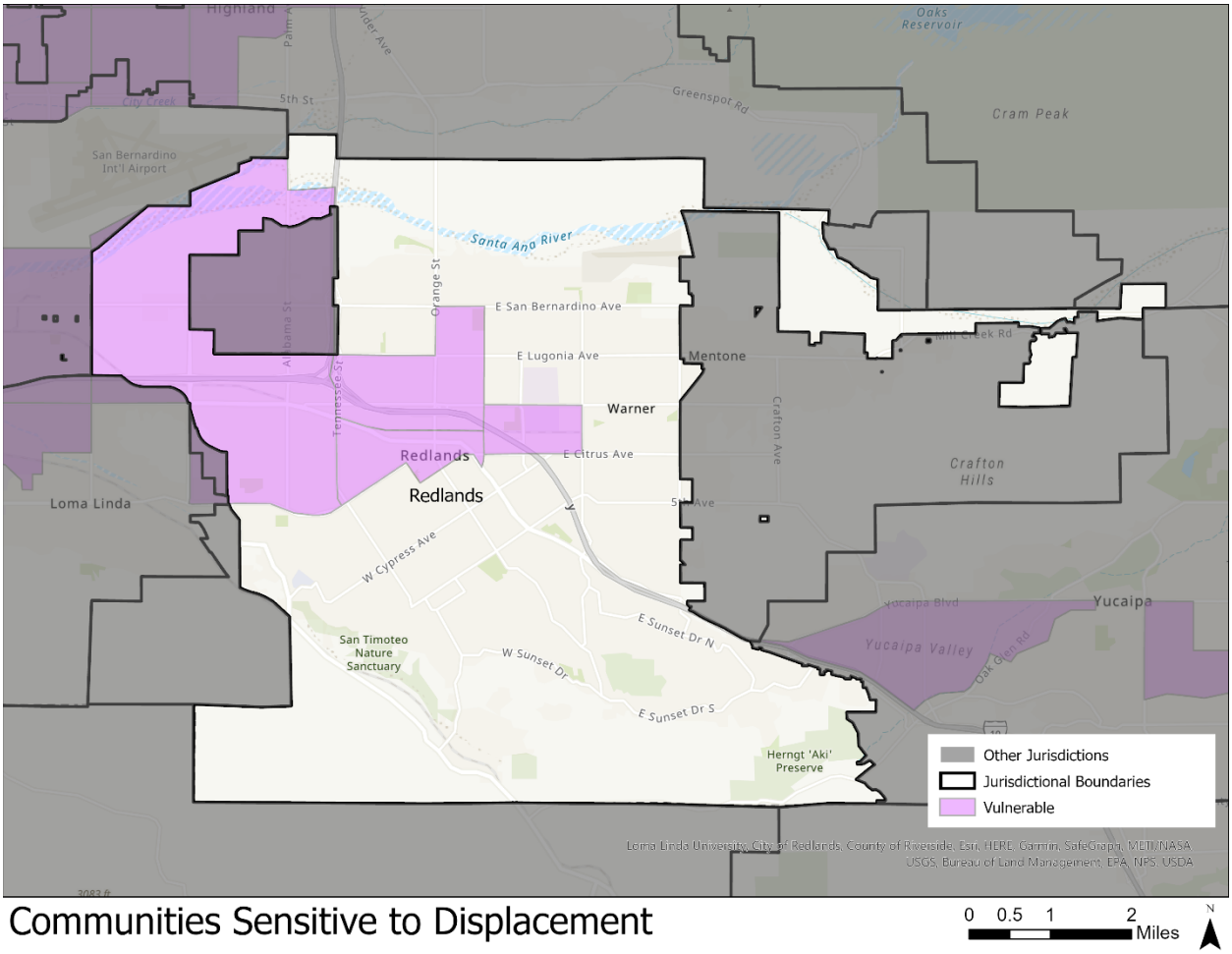
Areas north of I-10 zoned R-1 and within the half-mile of the downtown train station has been excluded from rezoning under the TVSP with the intent of not inducing displacement. Only commercially zoned parcels will undergo zone/development standard updates under the TVSP. Additionally, to take further 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 N

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

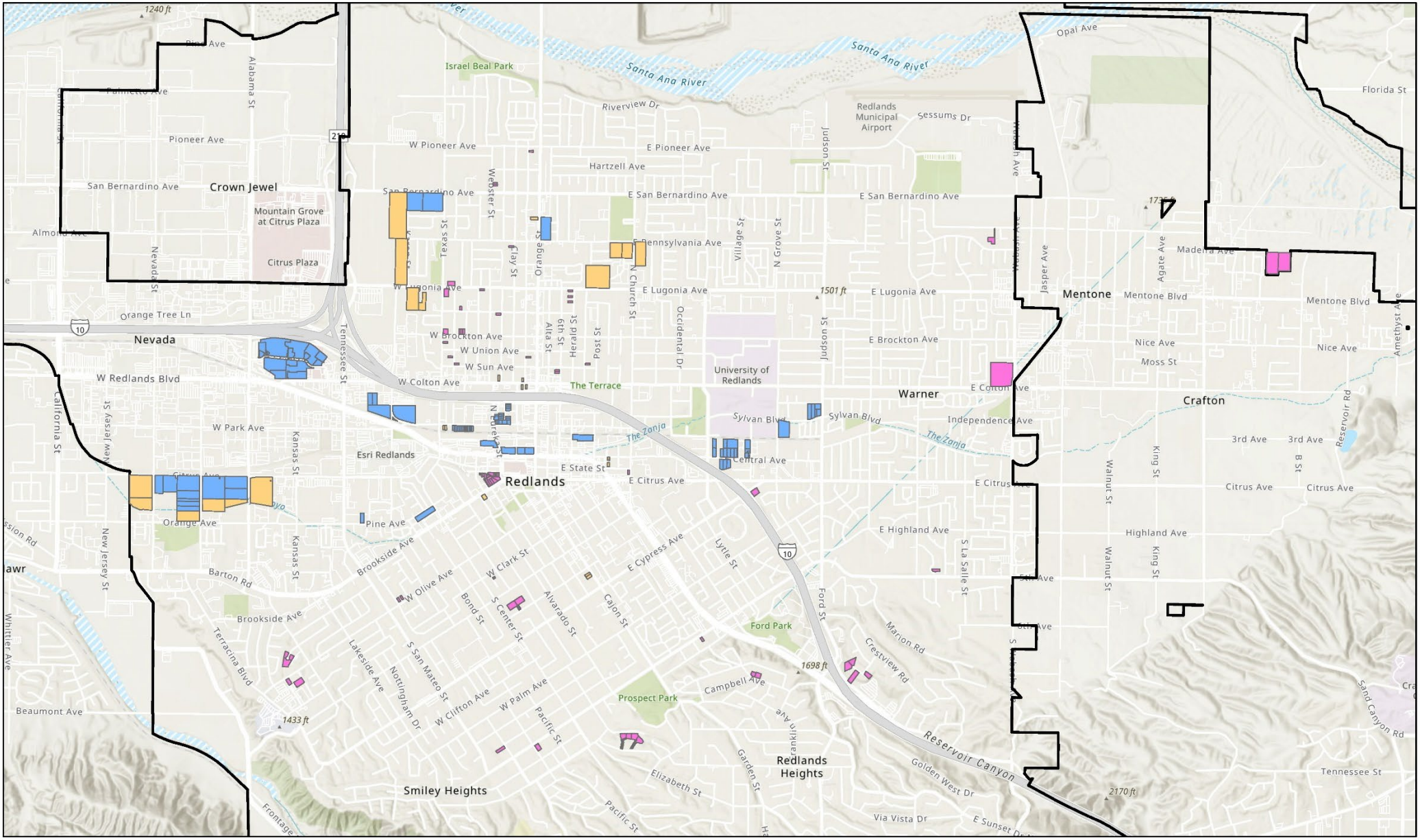
Fair Housing Issue	Contributing Factor	Meaningful Actions	Priority
Outreach Capacity	Lack of monitoring Lack of awareness of fair housing services Lack of a variety of media inputs Lack of marketing community meetings	Continue to contract with a fair housing service provider to provide fair housing services 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	Low

Fair Housing Issue	Contributing Factor	Meaningful Actions	Priority
		basis. City will 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

Michael Baker
INTERNATIONAL

Appendix A:
Site Inventory Map



N

0 0.5 1 Miles

Lower | Moderate | Above Moderate | Redlands Boundary

RHNA Sites

Source: City of Redlands, 2021

Redlands Housing Element Update

Michael Baker
INTERNATIONAL

Michael Baker
INTERNATIONAL

Appendix B:
Site Inventory List

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
16712105	1624 Webster St	Vacant	N/A	R-1	OFFICE	0	0.146	0.87	0	1			6	1	Above Moderate
16714105	908 Elise Dr	Vacant	N/A	CP-4	OFFICE	0	4.997	0	0	0	HIGH DENSITY RESIDENTIAL	R-3	30	120	Lower
16714106	1555 Texas St	Vacant	N/A	CP-4	OFFICE	0	6.306	0	0	0	HIGH DENSITY RESIDENTIAL	R-3	30	151	Lower
16715123	1505 Orange St	Vacant	N/A	R-2	MEDIUM DENSITY RESIDENTIAL	0	0.328	8.85	0	7			27	7	Moderate
16716110	1502 Orange St	Vacant	5th	R-2	MEDIUM DENSITY RESIDENTIAL	0	3.958	106.87	0	85			27	85	Lower
16717104	1402 Karon St	Vacant	N/A	EV/SD	MEDIUM DENSITY RESIDENTIAL	0	9.698	0	0	0	MEDIUM DENSITY RESIDENTIAL	R-2	15	116	Moderate
16718102	1312 Texas St	Vacant	N/A	R-1	COMMERCIAL	0	0.523	3.14	0	3			6	3	Above Moderate
16723105	709 W Lugonia Ave	Vacant	5th	R-1	COMMERCIAL	0	0.620	3.72	0	3			6	3	Above Moderate
16723226	606 W Western Ave	Vacant	N/A	R-1	COMMERCIAL	0	0.134	0.80	0	1			6	1	Above Moderate
16723312	1244 Columbia St	Vacant	N/A	R-1	COMMERCIAL	0	0.154	0.93	0	1			6	1	Above Moderate
16725313	1257 Herald St	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.132	0.79	0	1			6	1	Above Moderate
16725316	1239 Herald St	Vacant	N/A	R-2	LOW DENSITY RESIDENTIAL	0	0.152	0.91	0	1			6	1	Above Moderate
16725319	1227 Herald St	Vacant	N/A	R-2	VERY LOW DENSITY RESIDENTIAL	0	0.152	0.91	0	1			6	1	Above Moderate
16728101	740 W Brockton Ave	Vacant	N/A	R-1	VERY LOW DENSITY RESIDENTIAL	0	0.431	2.58	0	2			6	2	Above Moderate
16728219	1111 Calhoun St	Vacant	N/A	R-1	LOW DENSITY RESIDENTIAL	0	0.205	1.23	0	1			6	1	Above Moderate
16728220	1111 Calhoun St	Vacant	N/A	R-1	LOW DENSITY RESIDENTIAL	0	0.171	1.03	0	1			6	1	Above Moderate
16728221	620 W Brockton Ave	Vacant	N/A	R-1	LOW DENSITY RESIDENTIAL	0	0.172	1.03	0	1			6	1	Above Moderate
16729110	1143 Ohio St	Vacant	N/A	R-1	LOW DENSITY RESIDENTIAL	0	0.166	1	0	1			6	1	Above Moderate
16813104	1537 Carmel Ct	Vacant	N/A	R-E	LOW DENSITY RESIDENTIAL	0	0.692	1.87	0	1			2.7	1	Above Moderate
16829102	1721 E Colton Ave	Vacant	5th	R-1	LOW DENSITY RESIDENTIAL	0	9.007	54.04	0	43			6	43	Above Moderate
121226129	1421 Hunter Dr	Vacant	5th	R-2	LOW DENSITY RESIDENTIAL	0	4.335	65.02	0	52			15	52	Moderate
16714104	912 Elise Dr	Vacant	N/A	CP-4	LOW DENSITY RESIDENTIAL	0	14.048	0	0	0	MEDIUM DENSITY RESIDENTIAL	R-2	15	169	Moderate
16903104	1018 Texas St	Vacant	N/A	R-1	VERY LOW DENSITY RESIDENTIAL	0	0.138	0.83	0	1			6	1	Above Moderate
16903212	929 Lawton St	Vacant	N/A	R-1	VERY LOW DENSITY RESIDENTIAL	0	0.142	0.85	0	1			6	1	Above Moderate
16903501	910 Lawton St	Vacant	N/A	R-1	VERY LOW DENSITY RESIDENTIAL	0	0.139	0.84	0	1			6	1	Above Moderate

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
16905311	302 W Colton Ave	Vacant	N/A	C-4	VERY LOW DENSITY RESIDENTIAL	0	0.198	5.94	0	3	TVSP	TVSP	30	3	Moderate
16906310	102 W Colton Ave	Vacant	N/A	C-4	LOW DENSITY RESIDENTIAL	0	0.135	4.04	0	2	TVSP	TVSP	30	2	Moderate
16906506	924 Washington St	Vacant	N/A	T	VERY LOW DENSITY RESIDENTIAL	0	0.137	0.82	0	1			6	1	Above Moderate
16907606	831 N 6th St	Vacant	N/A	R-2	VERY LOW DENSITY RESIDENTIAL	0	0.141	0.85	0	1			6	1	Above Moderate
16907607	831 N 6th St	Vacant	N/A	R-2	VERY LOW DENSITY RESIDENTIAL	0	0.149	0.90	0	1			6	1	Above Moderate
16910613	910 Tribune St	Vacant	N/A	R-2	VERY LOW DENSITY RESIDENTIAL	0	0.124	0.74	0	1			6	1	Above Moderate
16911123	663 New York St	Vacant	N/A	C-M	LOW DENSITY RESIDENTIAL	0	0.998	0	0	0	TVSP	TVSP	30	15	Lower
16911124	1120 W Redlands Blvd	Vacant	N/A	C-M	LOW DENSITY RESIDENTIAL	0	0.999	0	0	0	TVSP	TVSP	30	15	Lower
16915301	604 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.168	5.03	0	3	TVSP	TVSP	30	3	Lower
16915302	608 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.160	4.81	0	2	TVSP	TVSP	30	2	Lower
16915303	612 Ruiz St	Parking Lot	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.160	4.81	0	2	TVSP	TVSP	30	2	Lower
16915314	612 Ruiz St	Parking Lot	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.123	3.68	0	2	TVSP	TVSP	30	2	Lower
16915611	516 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.170	5.10	1	2	TVSP	TVSP	30	2	Lower
16915612	512 Ruiz St	Vacant	N/A	SP45/TC	OFFICE	0	0.162	4.86	1	1	TVSP	TVSP	30	1	Lower
16915613	512 Ruiz St	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.271	8.14	0	4	TVSP	TVSP	30	4	Lower
16915614	250 W Stuart St	Vacant	4th and 5th	SP45/TC	MEDIUM DENSITY RESIDENTIAL	0	0.351	10.54	0	5	TVSP	TVSP	30	5	Lower
16915615	511 Ruiz St	Vacant	4th and 5th	SP45/TC	COMMERCIAL	0	0.272	8.15	0	4	TVSP	TVSP	30	4	Lower
16915616	320 Stuart Ave	Vacant	4th and 5th	SP45/TC	COMMERCIAL	0	0.127	3.82	0	2	TVSP	TVSP	30	2	Lower
16915617	320 Stuart Ave	Vacant	4th and 5th	SP45/TC	COMMERCIAL	0	0.124	3.73	0	2	TVSP	TVSP	30	2	Lower
16915618	320 Stuart Ave	Vacant	4th and 5th	SP45/TC	MEDIUM DENSITY RESIDENTIAL	0	0.022	0.66	0	0	TVSP	TVSP	30	1	Lower
16915619	508 N Eureka St	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.290	8.70	0	4	TVSP	TVSP	30	4	Lower
16915620	516 N Eureka St	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.124	3.71	0	2	TVSP	TVSP	30	2	Lower
16915629	523 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.156	4.69	0	2	TVSP	TVSP	30	2	Lower
16915630	519 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.156	4.69	1	1	TVSP	TVSP	30	1	Lower
16915631	515 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.156	4.69	1	1	TVSP	TVSP	30	1	Lower

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
16915632	511 Ruiz St	Vacant	N/A	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.164	4.92	1	1	TVSP	TVSP	30	1	Lower
16920203	107 W Colton Ave	Vacant	N/A	C-4	LOW DENSITY RESIDENTIAL	0	0.148	4.43	0	2	TVSP	TVSP	30	2	Moderate
16920205	35 W Colton Ave	Vacant	N/A	C-4	LOW DENSITY RESIDENTIAL	0	0.123	3.68	0	2	TVSP	TVSP	30	2	Moderate
16925101	619 New York St	Single Family Residential	N/A	C-M	VERY LOW DENSITY RESIDENTIAL	0	3.817	0	1	-1	TVSP	TVSP	30	56	Lower
16927102	430 Texas St	Vacant	N/A	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.148	4.44	0	2	TVSP	TVSP	30	2	Moderate
16927103	715 W Stuart Ave	Vacant	N/A	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.152	4.55	0	2	TVSP	TVSP	30	2	Moderate
16927107	701 Stuart Ave	Vacant	N/A	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.160	4.80	0	2	TVSP	TVSP	30	2	Lower
16927109	619 Stuart Ave	Vacant	4th and 5th	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.176	5.27	0	3	TVSP	TVSP	30	3	Lower
16927110	615 Stuart Ave	Vacant	4th and 5th	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.176	5.27	0	3	TVSP	TVSP	30	3	Lower
16927111	611 W Stuart	Vacant	4th and 5th	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.176	5.27	0	3	TVSP	TVSP	30	3	Lower
16927112	611 W Stuart	Vacant	4th and 5th	SP45/SC	LOW DENSITY RESIDENTIAL	0	0.176	5.27	0	3	TVSP	TVSP	30	3	Lower
16927113	607 Stuart Ave	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.165	4.94	0	2	TVSP	TVSP	30	2	Lower
16927115	545 Stuart Ave	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.110	3.30	0	2	TVSP	TVSP	30	2	Lower
16927116	545 Stuart Ave	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.110	3.30	0	2	TVSP	TVSP	30	2	Lower
16927117	545 Stuart Ave	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.183	5.49	0	3	TVSP	TVSP	30	3	Lower
16927118	535 W Stuart Ave	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.108	3.25	0	2	TVSP	TVSP	30	2	Lower
16927119	535 W Stuart Ave	Vacant	4th and 5th	SP45/TC	LOW DENSITY RESIDENTIAL	0	0.090	2.71	0	1	TVSP	TVSP	30	1	Lower
16927120	535 W Stuart Ave	Commercial and Services	4th and 5th	SP45/TC	COMMERCIAL/INDUSTRIAL	0	0.158	4.73	0	2	TVSP	TVSP	30	2	Lower
16927153	701 Stuart Ave	Vacant	4th and 5th	SP45/SC	COMMERCIAL	0	0.175	5.26	0	3	TVSP	TVSP	30	3	Lower
16927229	420 W Redlands Blvd	Parking Lot	N/A	M-1	COMMERCIAL/INDUSTRIAL	0	1.569	0	0	0	TVSP	TVSP	30	24	Lower
16928130	120 W Redlands Blvd	Commercial and Services	N/A	SP45/TCH	COMMERCIAL/INDUSTRIAL	0	1.479	44.36	0	22	TVSP	TVSP	30	22	Lower
16928154	110 W Redlands Blvd	Commercial and Services	N/A	SP45/TCH	COMMERCIAL/INDUSTRIAL	0	0.868	26.03	0	13	TVSP	TVSP	30	13	Lower
16928155	4 W Redlands Blvd	Commercial and Services	N/A	SP45/TCH	COMMERCIAL/INDUSTRIAL	0	1.006	30.18	0	15	TVSP	TVSP	30	15	Lower
16931317	301 9th St	Vacant	N/A	SP45/SC	COMMERCIAL/INDUSTRIAL	0	2.157	64.70	0	32	HIGH DENSITY RESIDENTIAL	R-3	30	52	Lower

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
16937106	1580 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL/INDUSTRIAL	0	1.163	0	0	0	TVSP	TVSP	30	17	Lower
16937110	1580 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	0.051	0	0	0	TVSP	TVSP	30	1	Lower
16937112	1580 Industrial Park Ave	Parking Lot	N/A	EV/CG	COMMERCIAL	0	0.149	0	0	0	TVSP	TVSP	30	2	Lower
16937117	1580 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	0.057	0	0	0	TVSP	TVSP	30	1	Lower
16937118	1520 Industrial Park Ave	Parking Lot	N/A	EV/CG	COMMERCIAL	0	0.096	0	0	0	TVSP	TVSP	30	1	Lower
16937121	1580 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	0.077	0	0	0	TVSP	TVSP	30	1	Lower
16937122	1580 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	0.415	0	0	0	TVSP	TVSP	30	6	Lower
16938105	1520 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	6.964	0	0	0	TVSP	TVSP	30	104	Lower
16938108	830 Tri City Center Dr	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	1.066	0	0	0	TVSP	TVSP	30	16	Lower
16938110	800 Tri City Center Dr	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	2.350	0	0	0	TVSP	TVSP	30	35	Lower
16938111	1460 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	0.908	0	0	0	TVSP	TVSP	30	14	Lower
16938113	1515 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	4.572	0	0	0	TVSP	TVSP	30	69	Lower
16938114	801 Tri City Center Dr	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	1.895	0	0	0	TVSP	TVSP	30	28	Lower
16940113	1350 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	0.695	0	0	0	TVSP	TVSP	30	10	Lower
17012111	1327 Sylvan Blvd	Single Family Residential	N/A	R-2	COMMERCIAL	0	0.996	26.90	1	21	TVSP	TVSP	30	14	Lower
17012112	1329 Sylvan Blvd	Single Family Residential	N/A	R-2	COMMERCIAL	0	0.900	24.29	1	18	TVSP	TVSP	30	12	Lower
17012113	633 N Judson St	Single Family Residential	N/A	R-2	COMMERCIAL	0	0.573	15.47	1	11	TVSP	TVSP	30	8	Lower
17012114	1331 Sylvan Blvd	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.490	13.24	0	11	TVSP	TVSP	30	7	Lower
17012115	1331 Sylvan Blvd	Single Family Residential	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.249	6.71	1	4	TVSP	TVSP	30	3	Lower
17017101	1316 Sylvan Blvd	Vacant	5th	R-2	HIGH DENSITY RESIDENTIAL	0	3.127	84.43	0	68	TVSP	TVSP	30	47	Lower
17020101	1129 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.287	7.76	0	6	TVSP	TVSP	30	4	Lower
17020102	1143 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.086	2.32	0	2	TVSP	TVSP	30	1	Lower
17020107	1123 E Central Ave	Multi-Family Residential	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.574	15.49	2	10	TVSP	TVSP	30	7	Lower
17020108	1119 E Central Ave	Single Family Residential	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.574	15.49	2	10	TVSP	TVSP	30	7	Lower

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
17020109	1115 E Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.574	15.49	0	12	TVSP	TVSP	30	9	Lower
17020112	1111 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.574	15.49	0	12	TVSP	TVSP	30	9	Lower
17020121	1111 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.574	15.49	0	12	TVSP	TVSP	30	9	Lower
17020124	1111 Central Ave	Vacant	5th	R-2	HIGH DENSITY RESIDENTIAL	0	0.574	15.50	0	12	TVSP	TVSP	30	9	Lower
17020130	337 N Cook St	Single Family Residential	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.799	21.58	1	16	TVSP	TVSP	30	11	Lower
17020133	1113 E Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.413	11.16	0	9	TVSP	TVSP	30	6	Lower
17020134	1143 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.287	7.75	0	6	TVSP	TVSP	30	4	Lower
17020135	1143 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.137	3.71	0	3	TVSP	TVSP	30	2	Lower
17020137	1125 Central Ave	Vacant	N/A	R-2	HIGH DENSITY RESIDENTIAL	0	0.430	11.62	1	8	TVSP	TVSP	30	5	Lower
17020138	1129 Central Ave	Vacant	5th	R-2	HIGH DENSITY RESIDENTIAL	0	1.867	50.40	0	40	TVSP	TVSP	30	28	Lower
17025105	1110 Central Ave	Vacant	5th	R-2	HIGH DENSITY RESIDENTIAL	0	0.641	17.31	0	14	TVSP	TVSP	30	10	Lower
17025106	1122 Central Ave	Vacant	5th	R-2	HIGH DENSITY RESIDENTIAL	0	0.628	16.95	0	14	TVSP	TVSP	30	9	Lower
17025107	1122 Central Ave	Vacant	5th	R-2	HIGH DENSITY RESIDENTIAL	0	0.556	15.00	0	12	TVSP	TVSP	30	8	Lower
17108501	604 State St	Vacant	5th	A-P	HIGH DENSITY RESIDENTIAL	0	0.173	2.60	0	2	TVSP	TVSP	30	3	Moderate
17108503	604 Central Ave	Vacant	N/A	A-P	HIGH DENSITY RESIDENTIAL	0	0.055	0.83	0	1	TVSP	TVSP	30	1	Moderate
17108504	604 Central Ave	Vacant	N/A	A-P	HIGH DENSITY RESIDENTIAL	0	0.082	1.24	0	1	TVSP	TVSP	30	1	Moderate
17108913	21 Church St	Vacant	N/A	T	HIGH DENSITY RESIDENTIAL	0	0.125	1.87	0	1	TVSP	TVSP	30	1	Above Moderate
17118137	100 Tennessee St	Vacant	N/A	R-2	COMMERCIAL/INDUSTRIAL	0	0.663	17.91	0	14	TVSP	TVSP	30	10	Lower
17119129	15 Center St	Schools	5th	R-2	COMMERCIAL/INDUSTRIAL	0	1.888	50.96	0	41	TVSP	TVSP	30	28	Lower
17121109	419 Citrus Ave	Vacant	N/A	C-3	MEDIUM DENSITY RESIDENTIAL	0	0.035	1.06	0	1	TVSP	TVSP	30	1	Above Moderate
17121111	411 Citrus Ave	Vacant	N/A	C-3	MEDIUM DENSITY RESIDENTIAL	0	0.098	2.94	0	1	TVSP	TVSP	30	1	Above Moderate
17121112	407 W Citrus St	Vacant	N/A	C-3	MEDIUM DENSITY RESIDENTIAL	0	0.104	3.12	0	2	TVSP	TVSP	30	2	Above Moderate
17121113	216 Brookside Ave	Vacant	N/A	C-3	MEDIUM DENSITY RESIDENTIAL	0	0.156	4.69	0	2	TVSP	TVSP	30	2	Above Moderate

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
17121114	216 Brookside Ave	Vacant	N/A	C-3	MEDIUM DENSITY RESIDENTIAL	0	0.026	0.77	0	0	TVSP	TVSP	30	1	Above Moderate
17121121	216 Brookside Ave	Vacant	N/A	C-3	MEDIUM DENSITY RESIDENTIAL	0	0.152	4.56	0	2	TVSP	TVSP	30	2	Above Moderate
17124124	317 Brookside Ave	Vacant	5th	A-P	COMMERCIAL/INDUSTRIAL	0	0.344	10.32	0	5			30	5	Moderate
17135128	311 Normande Ct	Vacant	N/A	R-2	COMMERCIAL/INDUSTRIAL	0	0.074	1.11	0	1			15	1	Above Moderate
17205201	1617 W Olive Ave	Vacant	N/A	R-S	0	0	0.380	2.28	0	2			6	2	Above Moderate
17208218	1114 W Olive Ave	Vacant	N/A	R-S	MEDIUM DENSITY RESIDENTIAL	0	0.143	0.86	0	1			6	1	Above Moderate
17208220	1114 W Olive Ave	Vacant	N/A	R-S	COMMERCIAL	0	0.157	0.94	0	1			6	1	Above Moderate
17243147	141 Calle Constancia	Vacant	N/A	R-S	COMMERCIAL	0	0.903	5.42	0	4			6	4	Above Moderate
17243148	1509 Blossom Ct	Vacant	5th	R-S	COMMERCIAL	0	0.313	1.88	0	2			6	2	Above Moderate
17301139	550 North Pl	Vacant	5th	R-S	COMMERCIAL	0	0.996	5.98	0	5			6	5	Above Moderate
17301140	608 North Pl	Vacant	5th	R-S	COMMERCIAL	0	1.016	6.09	0	5			6	5	Above Moderate
17304315	516 S Cajon St	Vacant	N/A	A-P	COMMERCIAL	0	0.215	6.45	0	3			30	3	Moderate
17304316	532 S Cajon St	Vacant	N/A	A-P	COMMERCIAL	0	0.275	8.26	0	4			30	4	Moderate
17319116	1233 Morrison Dr	Vacant	N/A	R-S	COMMERCIAL	0	0.699	4.20	0	3			6	3	Above Moderate
17402149	1335 Knoll Rd	Vacant	N/A	R-A	COMMERCIAL	0	0.704	1.90	0	2			2.7	2	Above Moderate
17402150	1355 Knoll Rd	Vacant	N/A	R-A	COMMERCIAL	0	0.740	2.00	0	2			2.7	2	Above Moderate
17402151	1355 Knoll Rd	Vacant	N/A	R-A	COMMERCIAL	0	0.846	2.28	0	2			2.7	2	Above Moderate
17402160	1363 Knoll Rd	Vacant	N/A	R-A	COMMERCIAL	0	0.734	1.98	0	2			2.7	2	Above Moderate
17404103	322 E Highland Ave	Vacant	N/A	R-S	COMMERCIAL	0	0.172	1.03	0	1			6	1	Above Moderate
17408210	340 Summit Ave	Vacant	N/A	R-E	COMMERCIAL	0	0.474	1.28	0	1			2.7	1	Above Moderate
17460102	673 Bradbury Dr	Vacant	N/A	R-E	COMMERCIAL	0	0.501	1.35	0	1			2.7	1	Above Moderate
17460105	693 Bradbury Dr	Vacant	N/A	R-E	COMMERCIAL	0	1.060	2.86	0	2			2.7	2	Above Moderate
17460108	679 Chaucer Ct	Vacant	N/A	R-E	COMMERCIAL	0	0.583	1.57	0	1			2.7	1	Above Moderate
17511114	945 W Highland Ave	Vacant	N/A	R-S	COMMERCIAL	0	0.454	2.72	0	2			6	2	Above Moderate
29216505	27045 Citrus Ave	Agriculture	N/A	EV/IC	COMMERCIAL	0	5.840	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	139	Lower
29216506	10972 Iowa St	Single Family Residential	N/A	EV/IC	COMMERCIAL	0	3.146	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	75	Lower
29216507	11006 Iowa St	Single Family Residential	N/A	EV/IC	COMMERCIAL	0	1.075	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	25	Lower
29216508	11018 Iowa St	Single Family Residential	N/A	EV/IC	COMMERCIAL	0	1.897	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	45	Lower
29216509	11034 Iowa St	Single Family Residential	N/A	EV/IC	COMMERCIAL	0	1.900	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	45	Lower
29216517	10941 Nevada St	Agriculture	N/A	EV/IC	COMMERCIAL	0	4.027	0	0	0	HIGH DENSITY RESIDENTIAL	R-3	30	97	Lower
29216702	11063 Iowa St	Vacant	N/A	EV/IC	COMMERCIAL	0	4.869	0	0	0	MEDIUM DENSITY RESIDENTIAL	R-2	30	58	Moderate
29216707	169 Alabama St	Single Family Residential	N/A	EV/IC	COMMERCIAL	0	2.345	0	1	-1	MEDIUM DENSITY RESIDENTIAL	R-2	30	27	Moderate
29216728	10287 Alabama St	Single Family Residential	N/A	EV/IC	COMMERCIAL	0	4.725	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	112	Lower

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
29216729	169 Alabama St	Agriculture	N/A	EV/IC	COMMERCIAL	0	4.215	0	0	0	HIGH DENSITY RESIDENTIAL	R-3	30	101	Lower
29216730	11006 Iowa St	Agriculture	N/A	EV/IC	COMMERCIAL	0	8.857	0	0	0	HIGH DENSITY RESIDENTIAL	R-3	30	213	Lower
29220120	27395 Citrus Ave	Vacant	N/A	EV/IC	COMMERCIAL	0	10.648	0	0	0	MEDIUM DENSITY RESIDENTIAL	R-2	30	128	Moderate
29821109	1380 Plumwood	Vacant	N/A	R-1	COMMERCIAL	0	4.468	26.81	0	21			6	21	Above Moderate
29821139	2196 Madeira Ave	Vacant	N/A	R-E	COMMERCIAL	0	3.787	22.72	0	18			6	18	Above Moderate
16711410	1734 Washington St	Vacant	N/A	R-1	COMMERCIAL	0	0.147	0.88	0	1			6	1	Above Moderate
16712104	1612 Webster St	Vacant	N/A	R-1	COMMERCIAL	0	0.146	0.87	0	1			6	1	Above Moderate
16720133	1455 Clay St	Vacant	N/A	R-1	COMMERCIAL	0	0.156	0.94	0	1			6	1	Above Moderate
16927114	545 Stuart Ave	Vacant	4th and 5th	SP45/TC	COMMERCIAL	0	0.110	3.30	0	2	TVSP	TVSP	30	2	Lower
17110101	305 W State St	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.108	3.25	0	2	TVSP	TVSP	30	2	Above Moderate
17110102	305 W State St	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.108	3.25	0	2	TVSP	TVSP	30	2	Above Moderate
17110103	305 W State St	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.108	3.25	0	2	TVSP	TVSP	30	2	Above Moderate
17110104	309 W State St	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.108	3.25	0	2	TVSP	TVSP	30	2	Above Moderate
17110105	216 Brookside Ave	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.250	7.49	0	4	TVSP	TVSP	30	4	Above Moderate
17121115	216 Brookside Ave	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.116	3.49	0	2	TVSP	TVSP	30	2	Above Moderate
17121125	216 Brookside Ave	Vacant	N/A	C-3	PUBLIC/INSTITUTIONAL	0	0.462	13.87	0	7	TVSP	TVSP	30	7	Above Moderate
17243146	1520 Blossom Ct	Vacant	5th	R-S	PUBLIC/INSTITUTIONAL	0	0.364	2.18	0	2			6	2	Above Moderate
17447154	317 Silvertree Ln	Vacant	5th	R-E	PUBLIC/INSTITUTIONAL	0	0.348	2.09	0	2			6	2	Above Moderate
16902102	831 W Lugonia Ave	Vacant	5th	A-1	PUBLIC/INSTITUTIONAL	0	4.757	71.36	0	57			15	57	Moderate
16902111	831 W Lugonia Ave	Vacant	5th	R-1	PUBLIC/INSTITUTIONAL	0	1.641	24.62	0	20			15	20	Moderate
16722110	438 Hidalgo Ave	Vacant	5th	R-2	PUBLIC/INSTITUTIONAL	0	9.480	142.19	0	114			15	114	Moderate
16722116	1400 Church Pl	Vacant	5th	R-2	PUBLIC/INSTITUTIONAL	0	2.765	41.47	0	33			15	33	Moderate
16722115	539 Jurupa Ave	Vacant	5th	R-2	PUBLIC/INSTITUTIONAL	0	3.174	47.62	0	38			15	38	Moderate
16938109	810 Tri-City Center Dr	Commercial and Services	N/A	EV/CG	PUBLIC/INSTITUTIONAL	0	3.363	0	0	0	TVSP	TVSP	30	50	Lower
16940111	1372 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL/INDUSTRIAL	0	0.502	0	0	0	TVSP	TVSP	30	8	Lower
29216510	11090 Iowa St	Vacant	5th	EV3000RM	COMMERCIAL/INDUSTRIAL	0	4.067	61.00	1	48			15	48	Moderate

APN	Site Address/Intersection	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Zoning Designation (Current)	Current General Plan	Minimum Density Allowed (units/acre)	Parcel Size (Acres)	Max Units Existing Zoning	Existing Units	Realistic Capacity (Existing Zoning)	Projected General Plan	Projected Zoning	Max Density Allowed (units/acre)	Realistic Capacity (rezone)	New Income Category
29216303	11030 Nevada St	Single Family Residential	N/A	EV/IC	COMMERCIAL/INDUSTRIAL	0	4.261	0	1	-1	MEDIUM DENSITY RESIDENTIAL	R-2	15	50	Moderate
29216302	10940 Nevada St	Multi-Use Residential Agriculture	N/A	EV/IC	COMMERCIAL/INDUSTRIAL	0	8.905	0	2	-2	MEDIUM DENSITY RESIDENTIAL	R-2	15	105	Moderate
29216516	10941 Nevada St	Single Family Residential	N/A	EV/IC	HIGH DENSITY RESIDENTIAL	0	2.497	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	59	Lower
17460107	693 Bradbury Dr	Vacant	N/A	R-E	HIGH DENSITY RESIDENTIAL	0	0.877	2.37	0	2			2.7	2	Above Moderate
16938112	1402 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	4.682	0	0	0	TVSP	TVSP	30	70	Lower
16940110	1380 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	3.182	0	0	0	TVSP	TVSP	30	48	Lower
16940112	1362 Industrial Park Ave	Commercial and Services	N/A	EV/CG	COMMERCIAL	0	1.252	0	0	0	TVSP	TVSP	30	19	Lower
17121120	216 Brookside Ave	Vacant	N/A	C-3	COMMERCIAL	0	0.286	8.57	0	4	TVSP	TVSP	30	4	Above Moderate
17121116	216 Brookside Ave	Vacant	N/A	C-3	COMMERCIAL	0	0.218	6.55	0	3	TVSP	TVSP	30	3	Above Moderate
17121119	216 Brookside Ave	Vacant	N/A	C-3	COMMERCIAL	0	0.191	5.72	0	3	TVSP	TVSP	30	3	Above Moderate
17121118	216 Brookside Ave	Vacant	N/A	C-3	COMMERCIAL	0	0.229	6.86	0	3	TVSP	TVSP	30	3	Above Moderate
17121117	216 Brookside Ave	Vacant	N/A	C-3	COMMERCIAL	0	0.312	9.36	0	5	TVSP	TVSP	30	5	Above Moderate
16926124	620 New York St	Single Family Residential	N/A	C-M	COMMERCIAL	0	5.948	0	1	-1	HIGH DENSITY RESIDENTIAL	R-3	30	142	Lower
17408219	1313 Elm St	Vacant	N/A	R-E	COMMERCIAL	0	0.323	0.87	0	1			2.7	1	Above Moderate
17504247	1056 San Jacinto St	Vacant	N/A	R-S	COMMERCIAL/INDUSTRIAL	0	0.445	2.67	0	2			6	2	Above Moderate
APN					COMMERCIAL				0	0					

Michael Baker
INTERNATIONAL

Michael Baker INTERNATIONAL

Appendix C: Community Engagement

Community Outreach

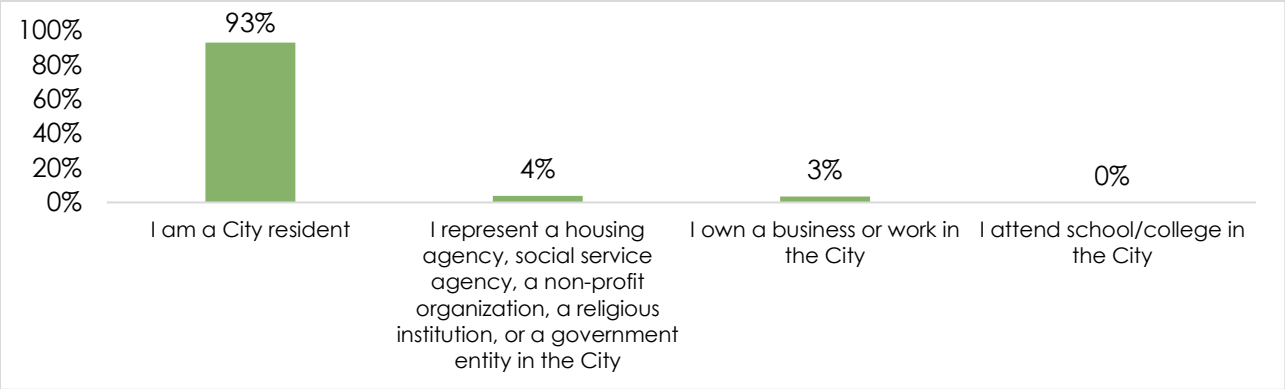
The California Government Code requires that local governments make diligent efforts to solicit public participation from all economic segments of the community, especially low-income persons, in the development of the Housing Element. During the preparation of this Housing Element update, public input was actively encouraged in a variety of ways. It should be noted that public meeting summaries, including questions and staff responses, have been summarized and edited for clarity.

8 EFFORTS TO ACHIEVE CITIZEN PARTICIPATION

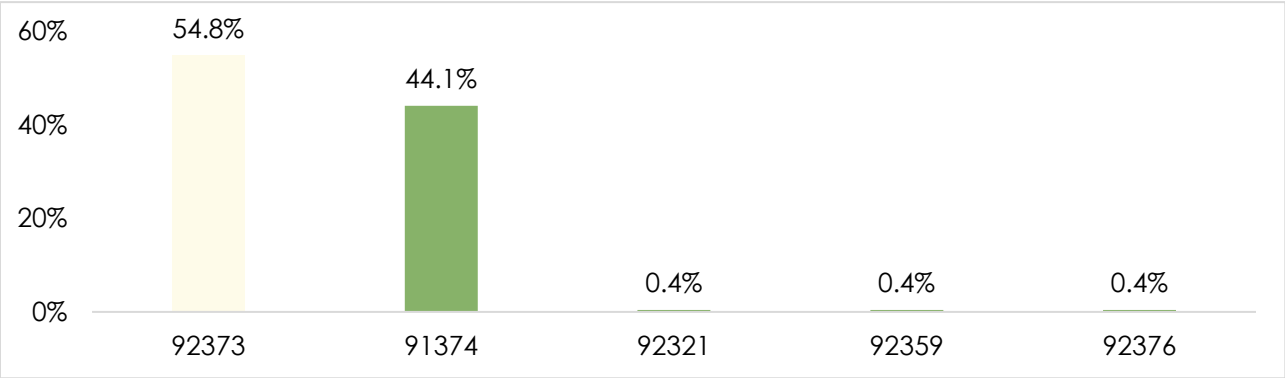
The public participation effort during the drafting of the 6th Cycle Housing Element update included an on-line public outreach survey, stakeholder interviews, and two virtual Community Workshops. Due to the COVID-19 Pandemic, the City took a new approach to meetings, which were primarily held on-line over Zoom. The first Community Workshop was held on Monday, April 26 and had 11 attendees from the public. The second was held on Thursday, May 13 and had six attendees from the public. A further 292 people participated in the on-line survey.

8.1 ON-LINE SURVEY RESULTS

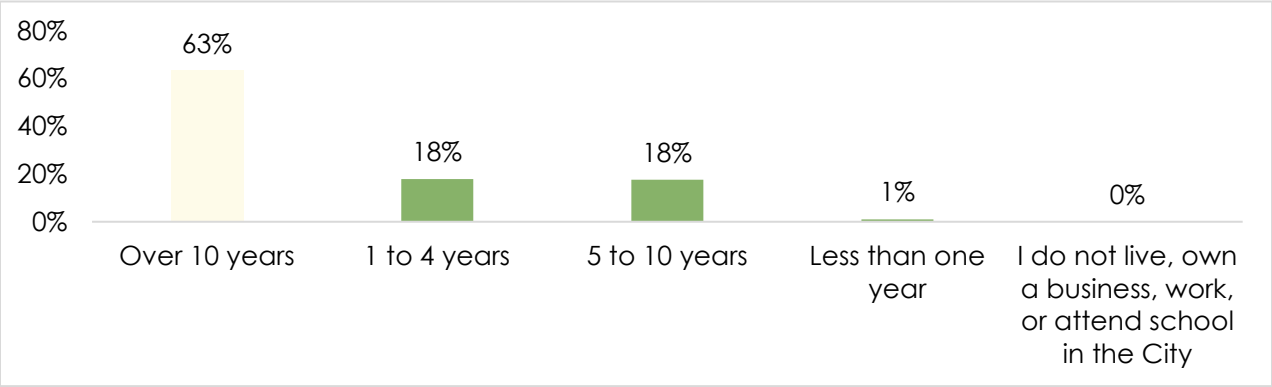
Q1. What is your involvement with the City of Redlands?



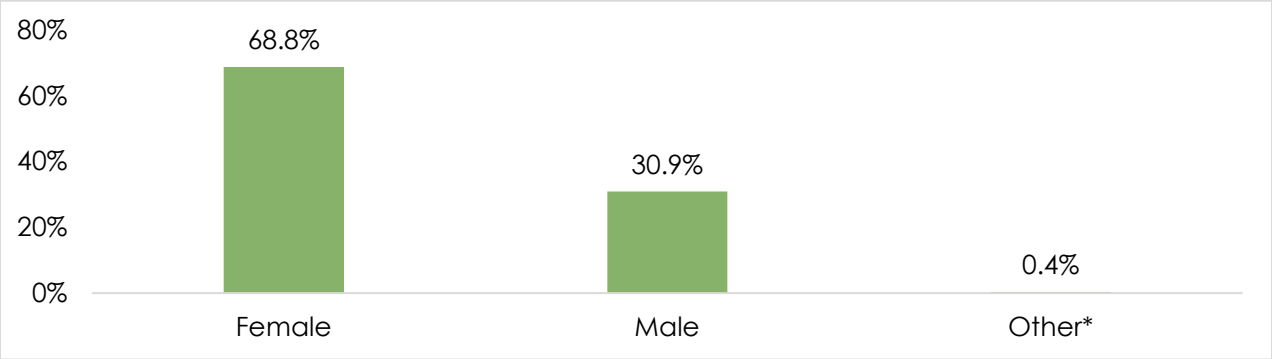
Q2. What is the zip code of your home/business/agency/school in Redlands?



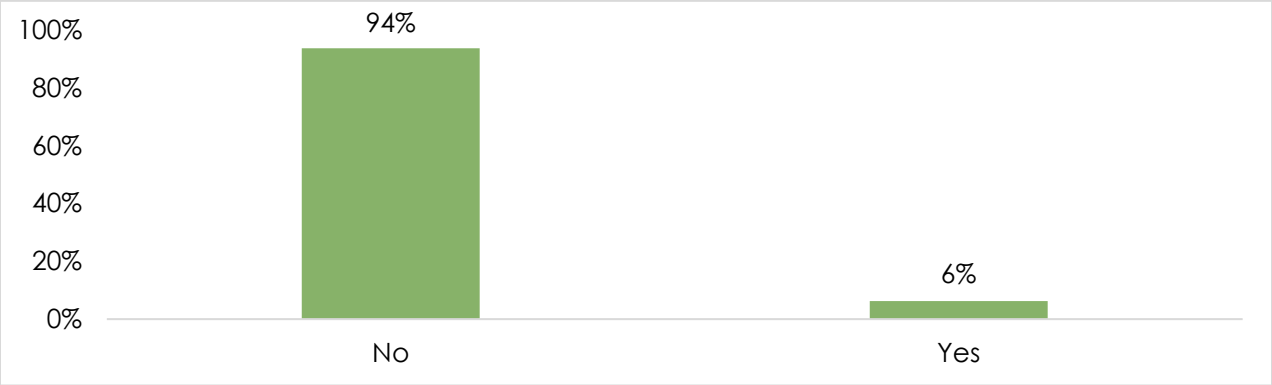
Q3. How long have you lived, owned a business, worked, or attended school in the City?



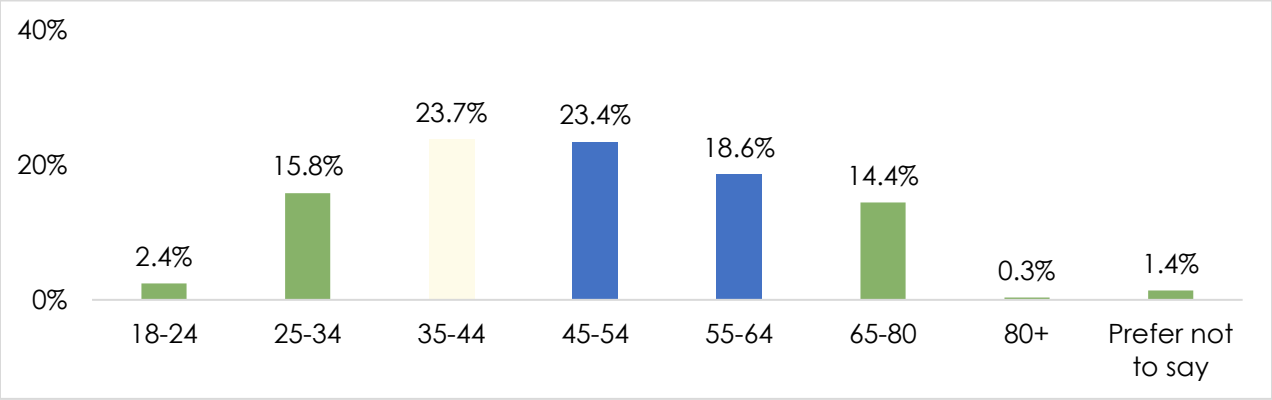
Q4. How do you identify?



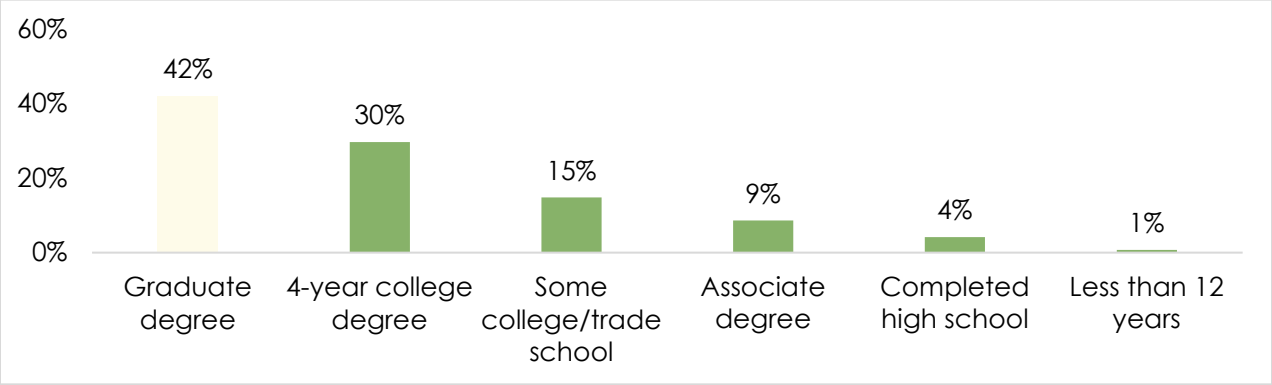
Q5. Do you have one or more conditions subject to the Americans with Disabilities Act (ADA)?



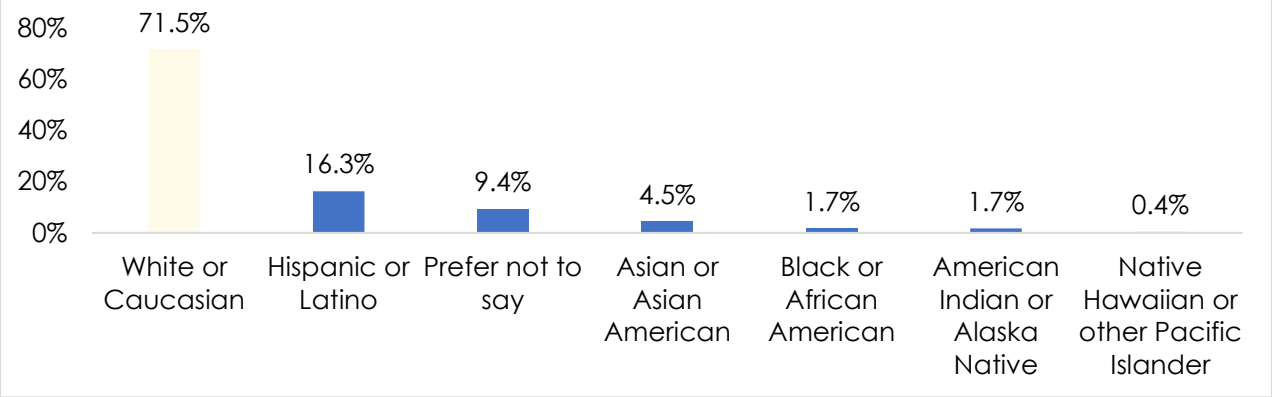
Q6. How old are you?



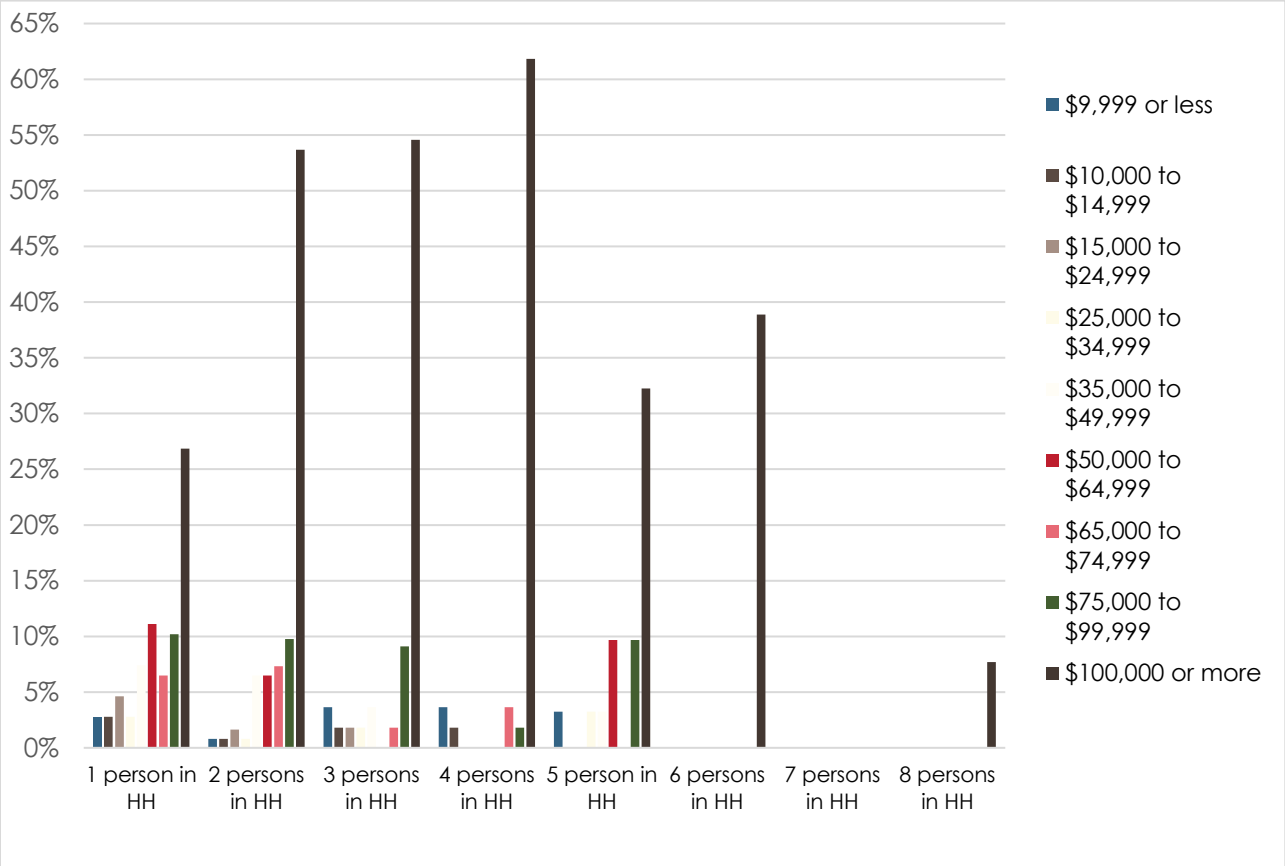
Q7. How many years of education have you completed?



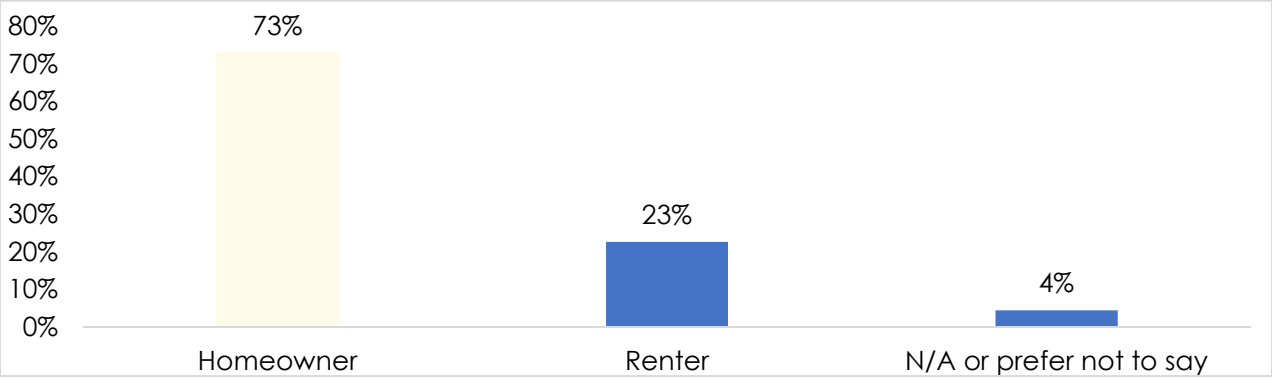
Q8. What is your race/ethnicity?



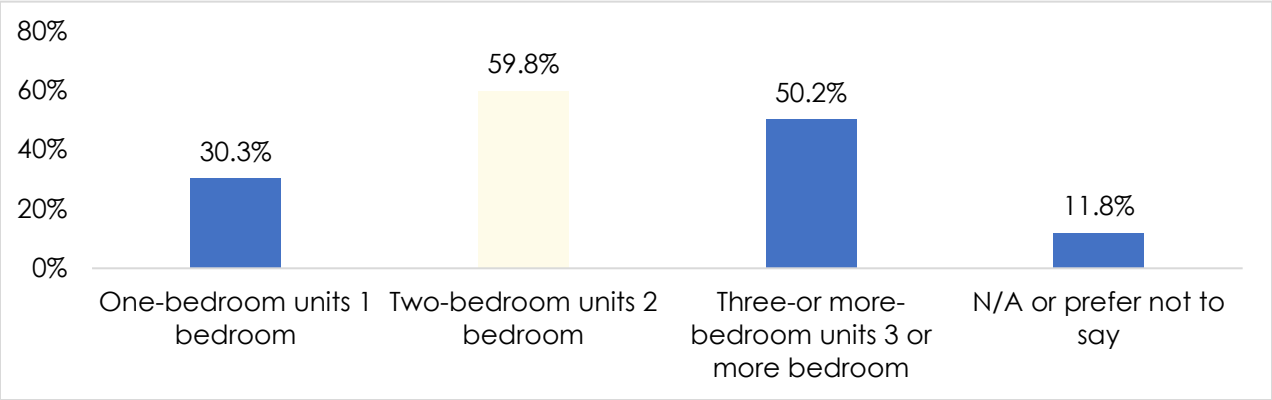
Q9. What is the approximate total annual income for your family, based on the number of people in your household (HH)?



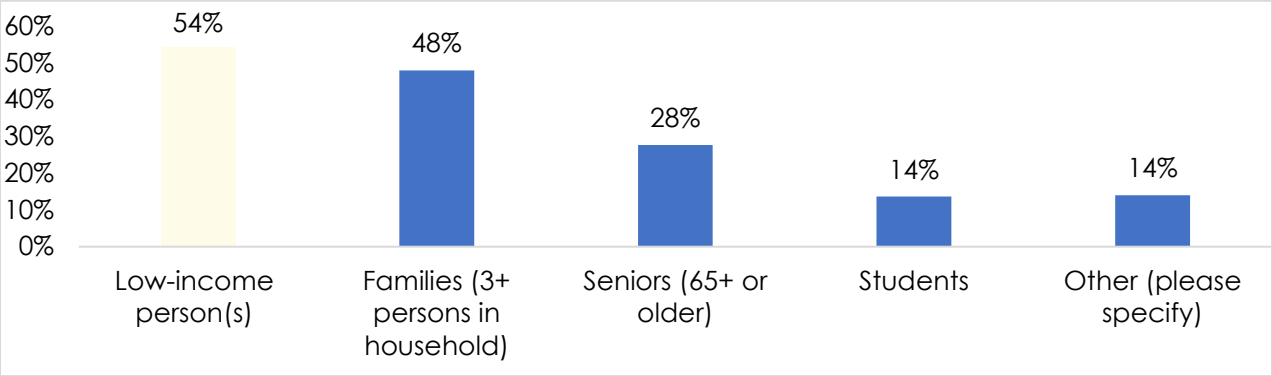
Q10. Are you a homeowner or a renter?



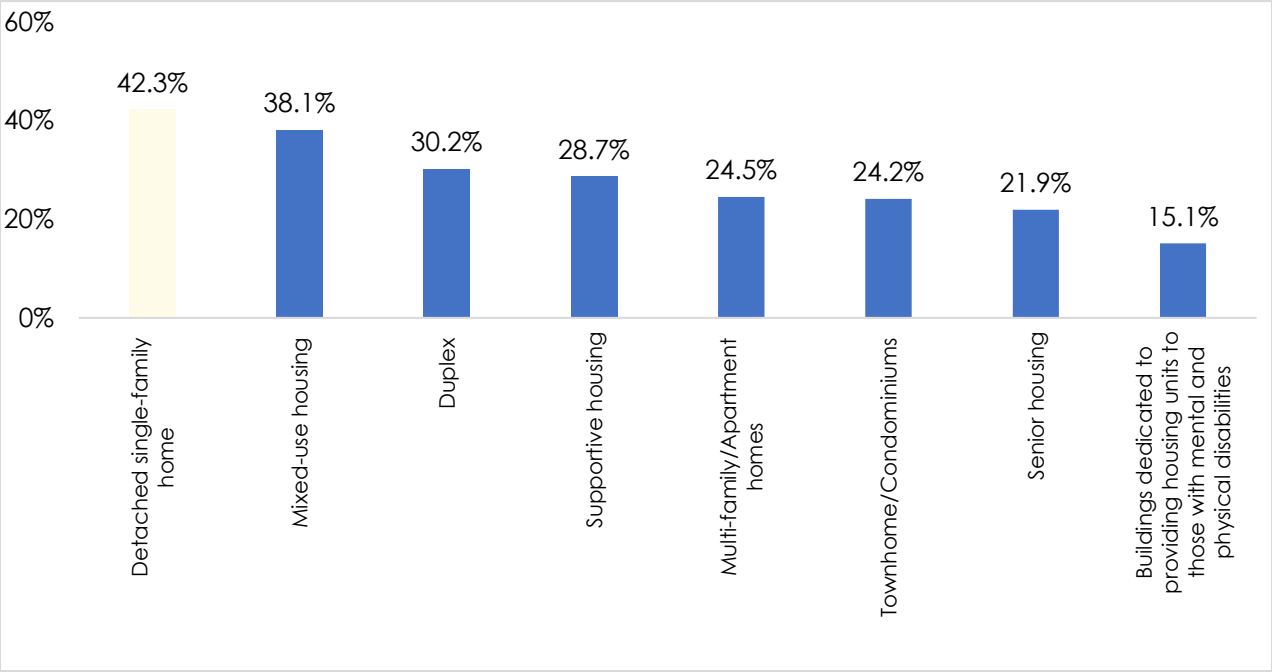
Q11. What size of housing units are most needed in the City?



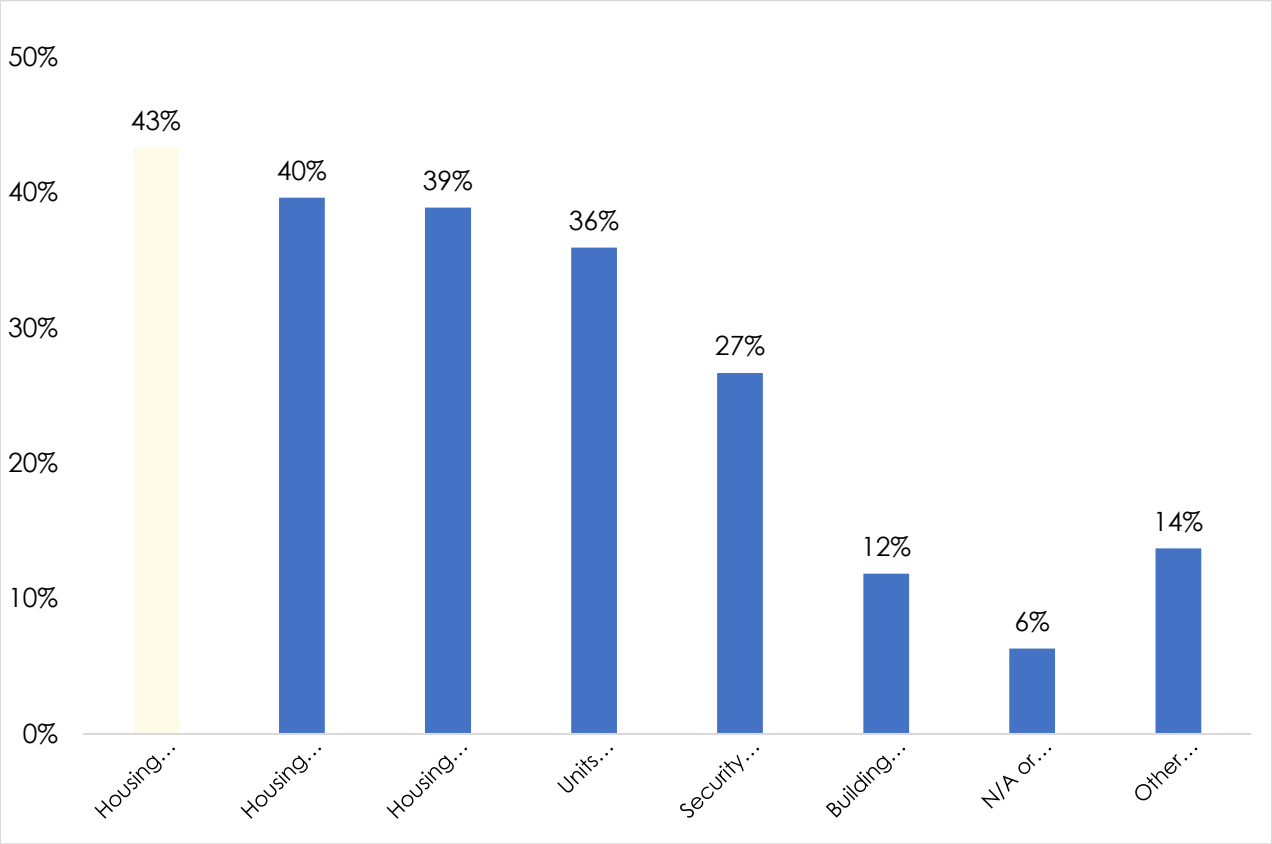
Q12. What demographic do you believe need housing the most in the City of Redlands?



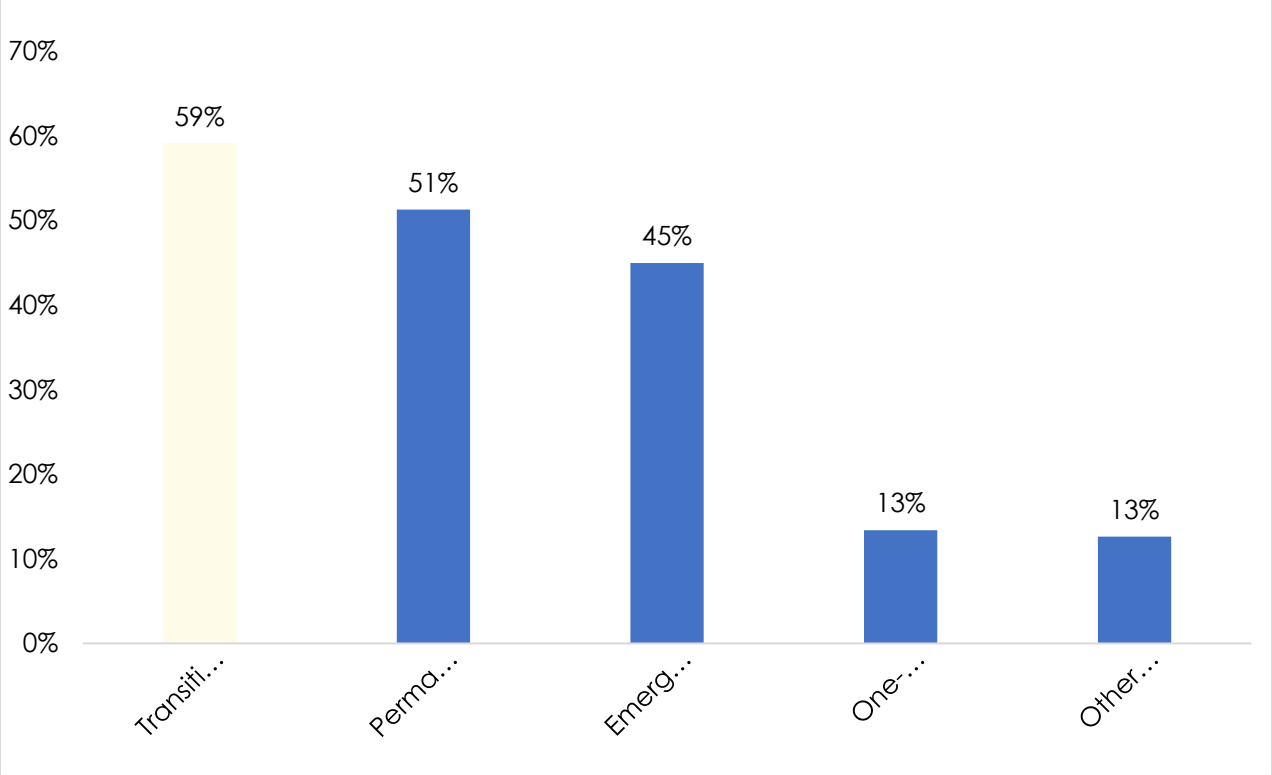
Q13. What type of housing units are most needed in the City?



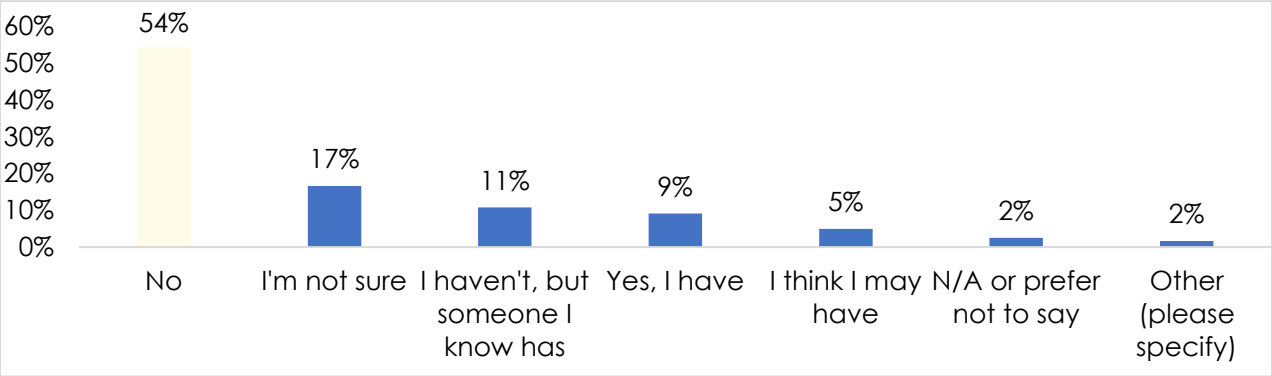
Q14. What housing amenities do you think are needed in the City?



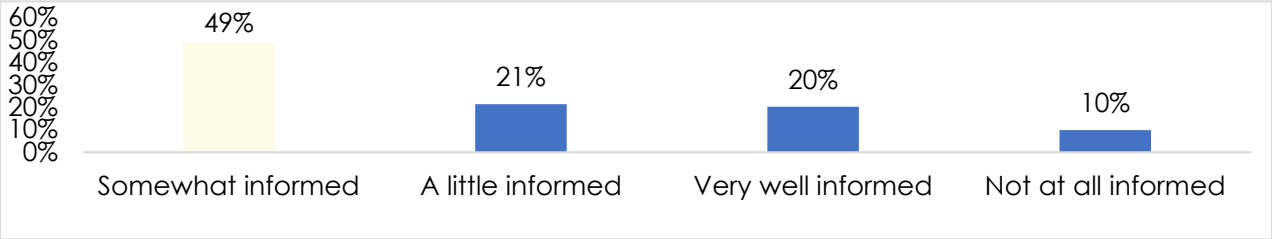
Q15. What are the most critical homeless needs in your community?



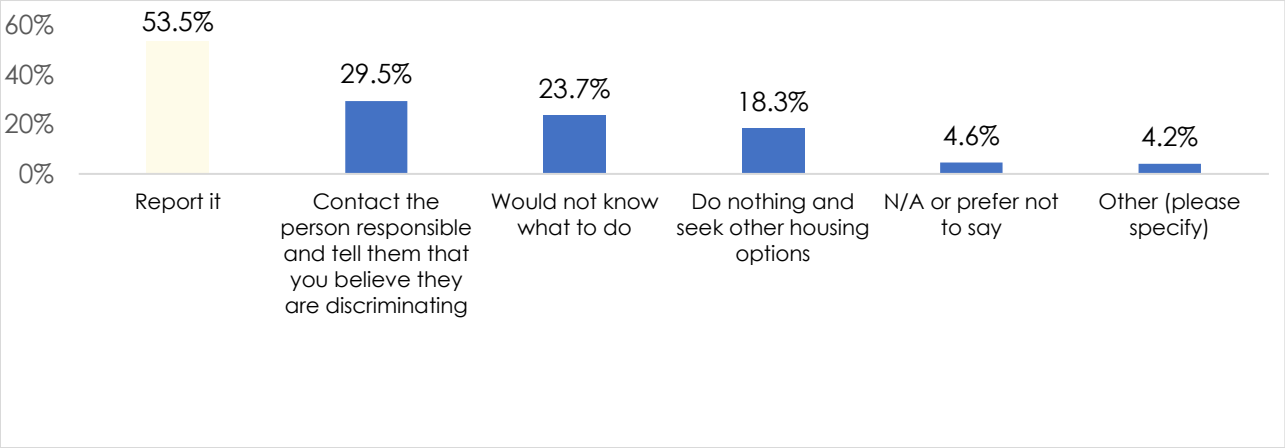
Q16. Have you or someone you know ever encountered any of the forms of housing discrimination?



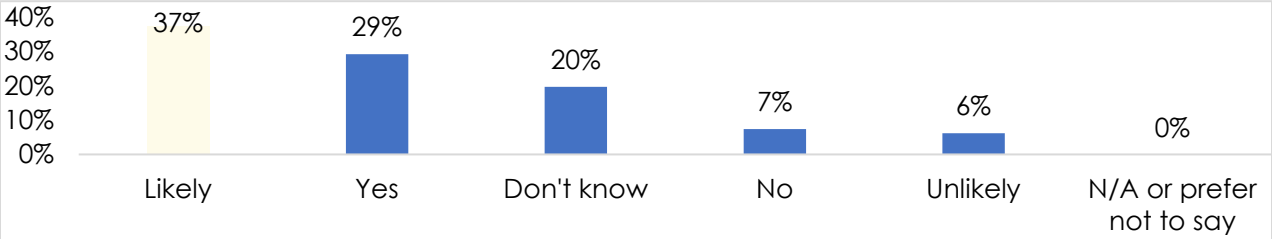
Q18. How well informed would you say you are about housing discrimination?



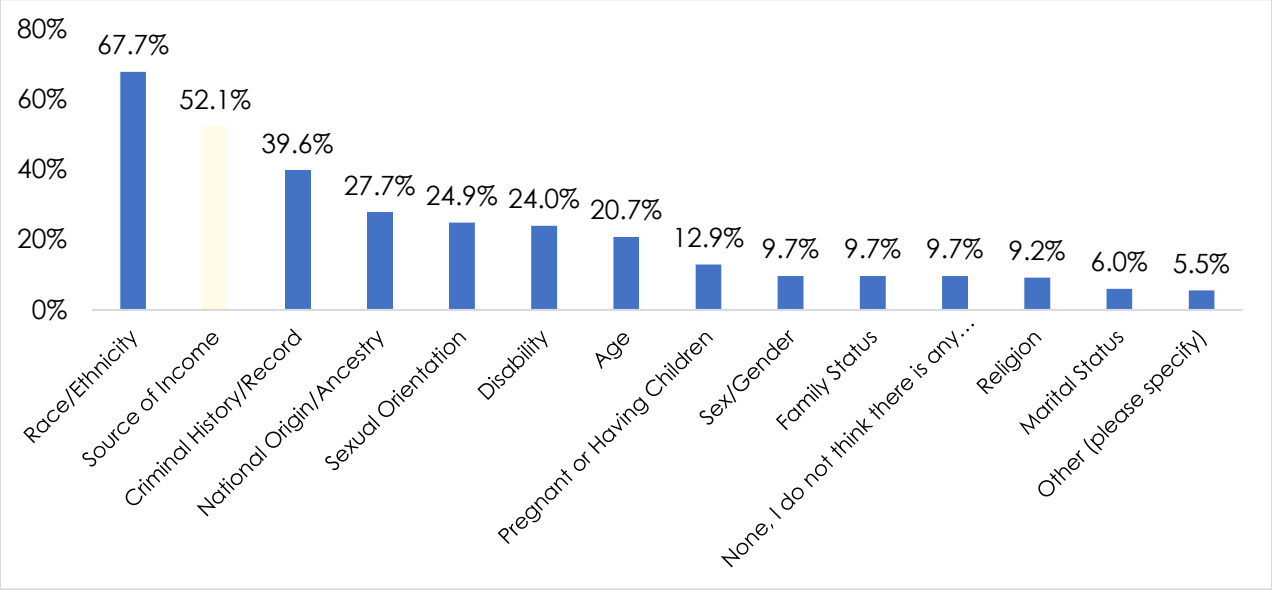
Q19. What would you do if you encountered housing discrimination?



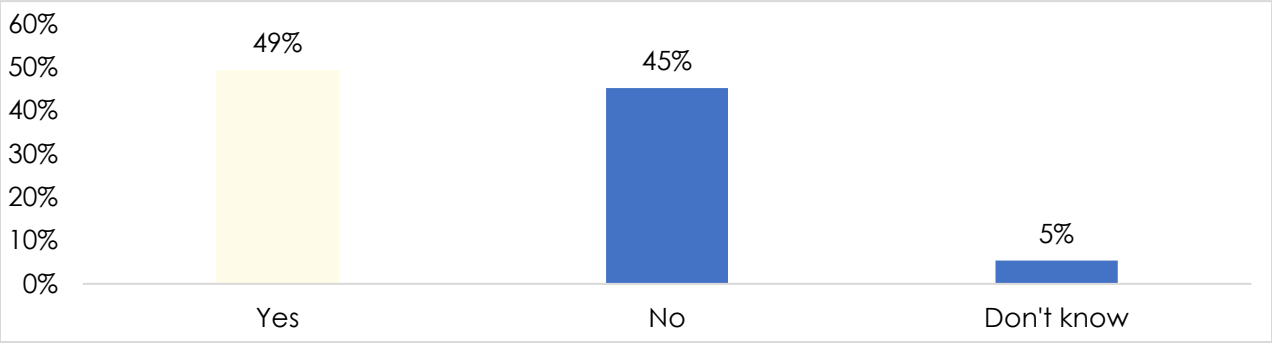
Q21. Do you believe housing discrimination occurs in the City?



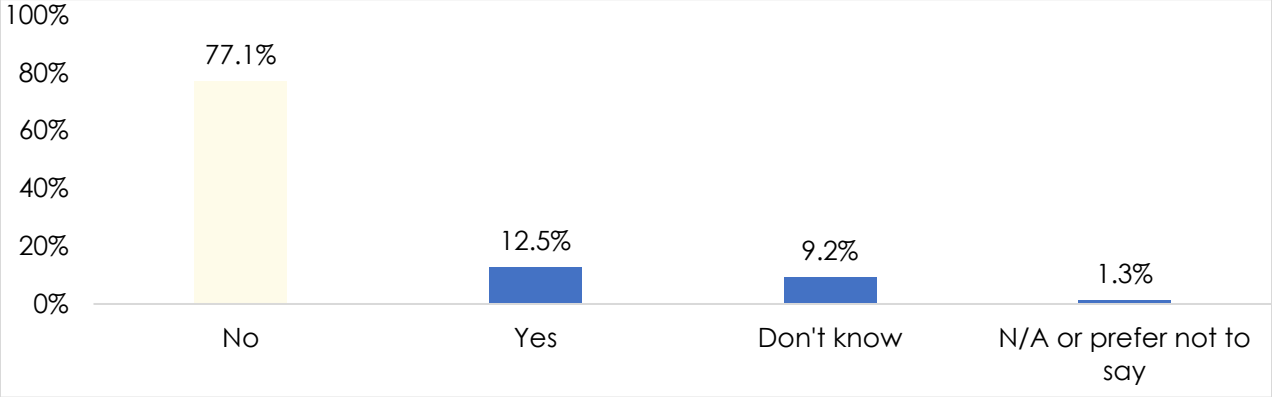
Q22. If you think housing discrimination is occurring, what types of discrimination do you think are most prevalent?



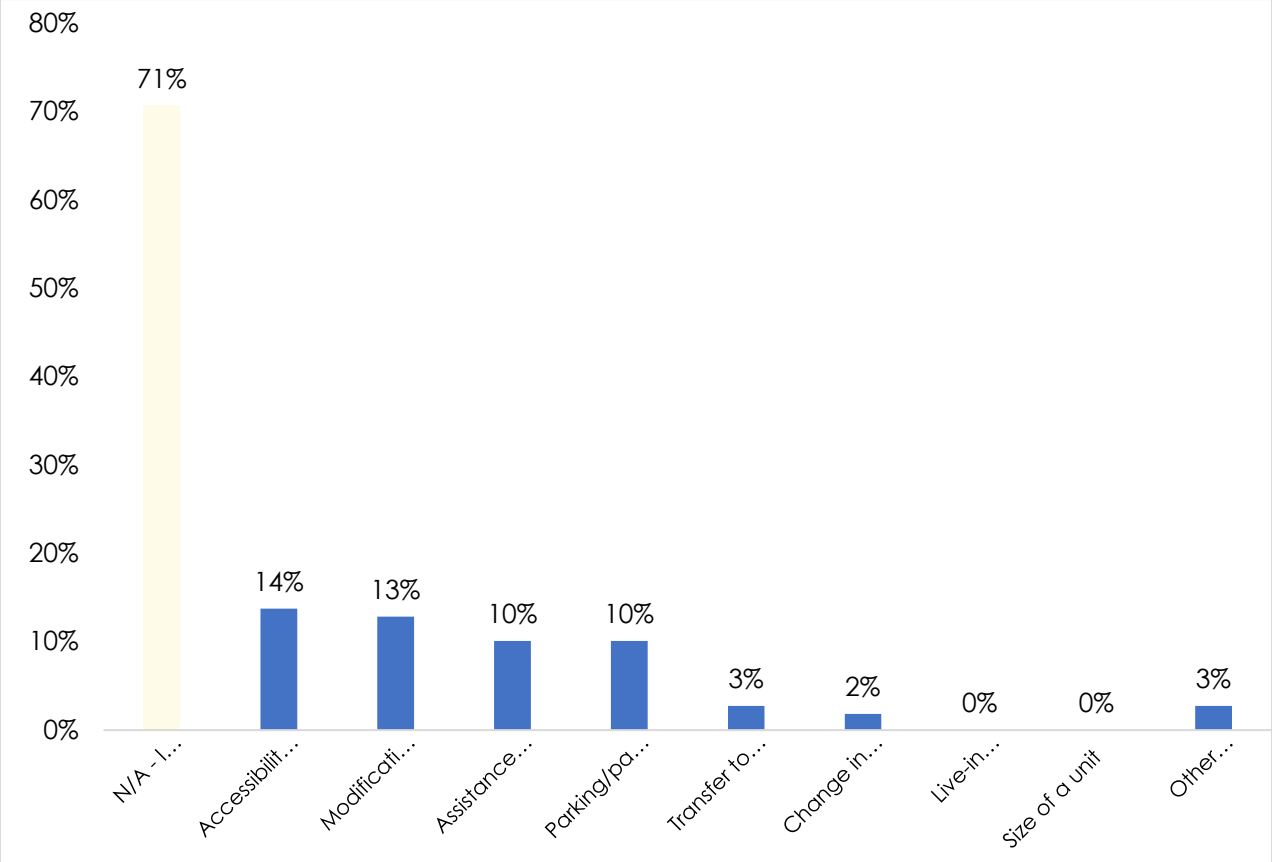
Q23. Were you aware of a tenant's right to request, from a landlord, a physical change to make a home more accessible if necessary due to a disability?



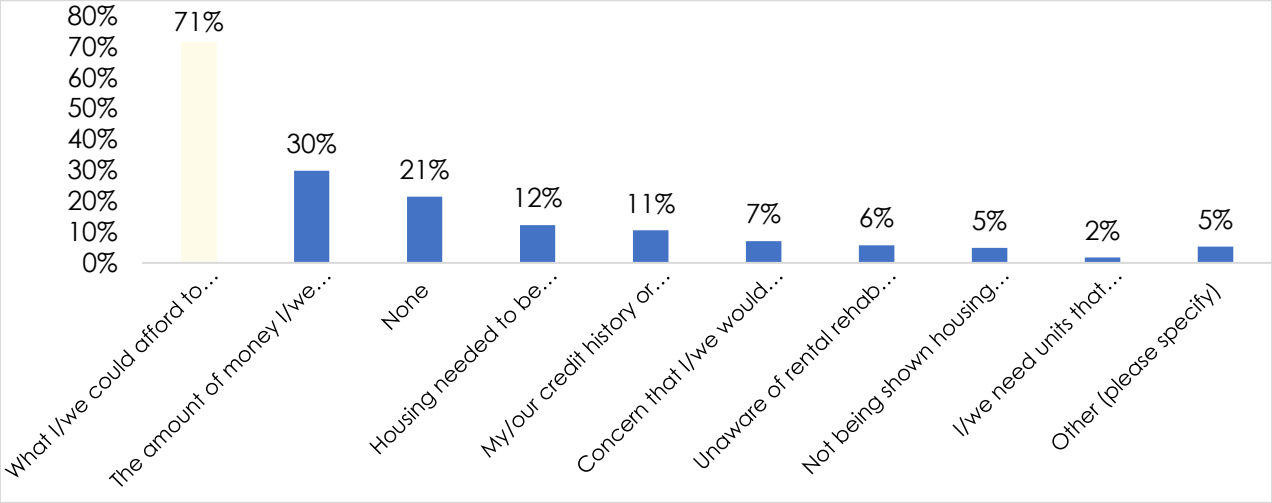
Q24. Have you, or someone you know, ever made a request for a reasonable accommodation?



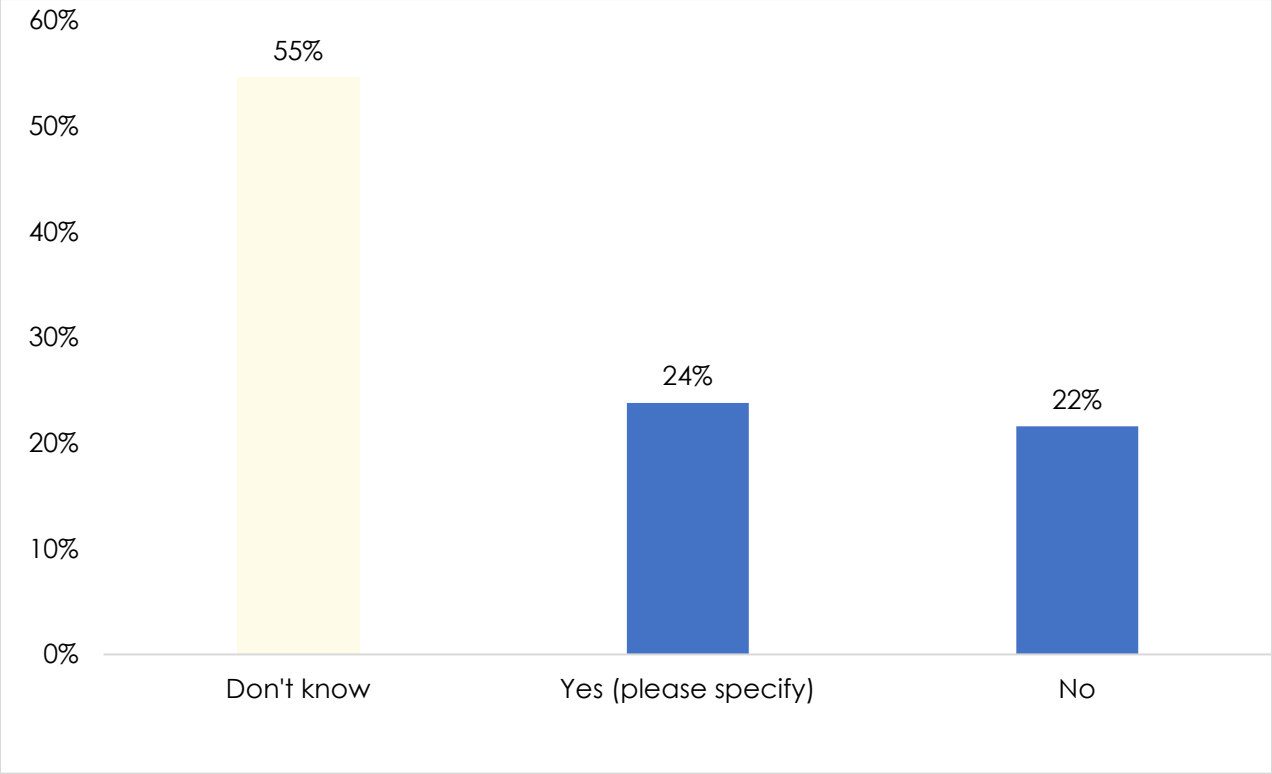
Q25. If yes, what type of accommodation and/or modification did you or the person you know request?



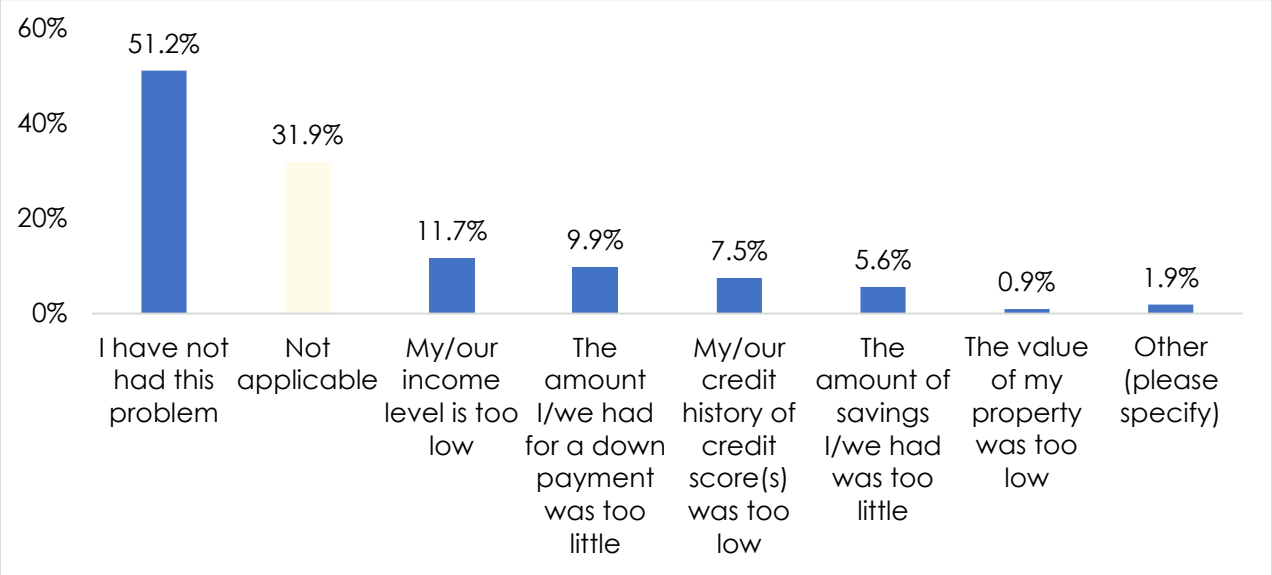
Q27. Which of the following issues, if any, have limited the housing options you were able to consider?



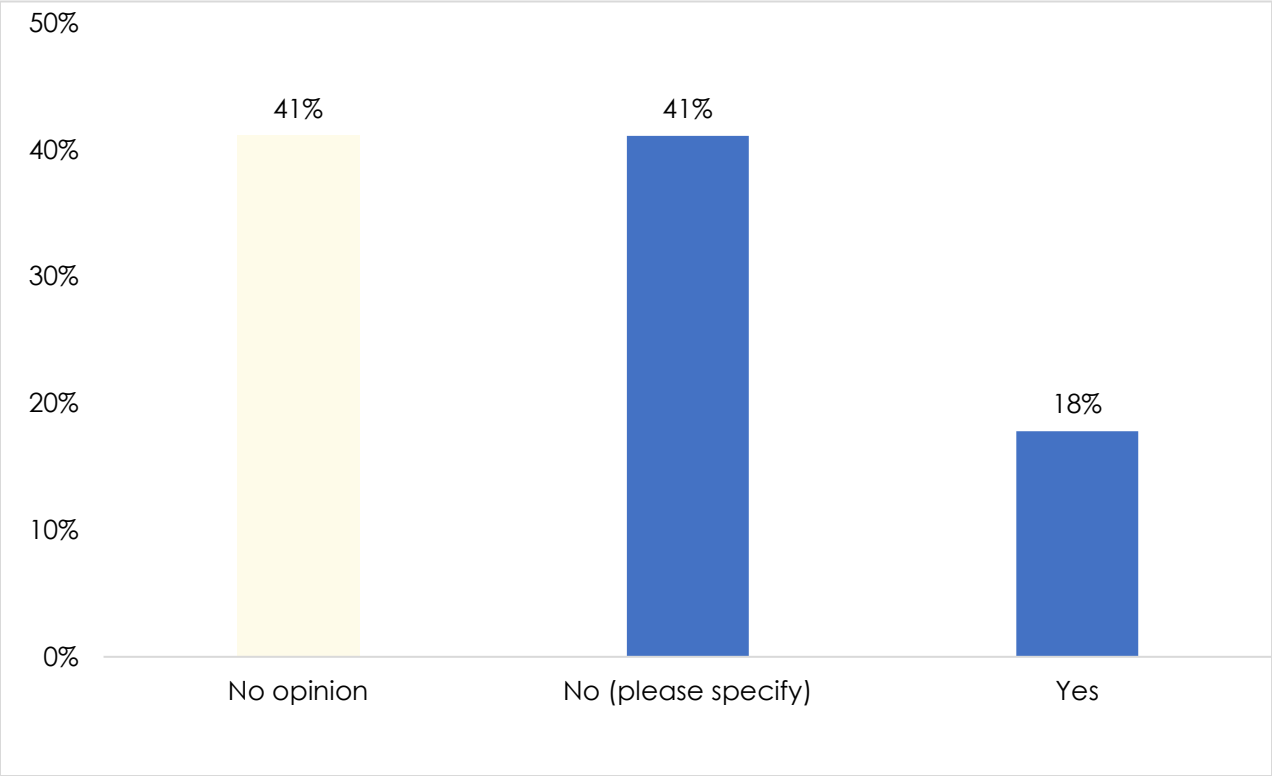
Q28. Are there any housing programs or services needed that you feel would reduce housing issues described in previous question?



Q29. If you think housing discrimination is occurring, what types of discrimination do you think are most prevalent?



Q30. Do you feel local land use regulations support the development of affordable housing?



8.2 STAKEHOLDER INTERVIEWS

As part of the 6th Cycle Housing Element, the following stakeholder groups were contacted as part of the public outreach process:

- Redlands Unified School District – March 4
- San Bernardino County Homeless Partnership – March 11
- Redlands Area Interfaith Council – March 11
- Family Service Association of Redlands – March 12
- Northside Redlands Visioning Committee – March 12
- Inland Valley Association of Realtors – March 12
- Building Industry Association –March 16
- Inland SoCal United Way – March 18
- Inland Temporary Homes – March 18
- University of Redlands – March 25

- Redlands Chamber of Commerce – March 30

In each stakeholder interview, the stakeholders were asked the following questions:

- Please describe your agency or role in the City?
- What would you say are your agency's top priorities in the next:
  1-2 years?
  3-5 years?
  6 years onward?
- What do you think is the best strategy to build more housing to meet City of Redlands' RHNA goals?
- What segment of the City's population do you think is most vulnerable in terms of having affordable housing?
- How do you think the City can assist those/that population segment?
- What do you think the greatest challenge may be in terms of housing needs for the City?

The responses of each participating organization were as follows:

8.2.1 Redlands Unified School District

The Redlands Unified School District (the District) is an educational partner of the City of Redlands. The District believes the best strategy to meet RHNA goals is to look back on past Measures/Ordinances and review its impact on the local community. For example, Measure U affects the District the most. This measure focuses on growth control, but this is a burden on school district because of a decline in enrollment. It is difficult for the District to maintain budgets while meeting enrollment. The District suggests that City Council focus on the socioeconomic status of population and outdated ordinances. The language written in Measure U (specifically Section 1.a.0.b and 1.a.0.c) hinders the District.

The District notes there is a lack of opportunity for young families to move to Redlands. Housing prices as well as single-family developments are too high for young families. The District states there must be more options for young families, such as 3-bedroom apartments.

The District states that the City can assist vulnerable populations through a good socioeconomic plan, and through rezoning or zoning certain areas as multi-use for young families. At present, development pressure is concentrated on the outskirts of town due to a lack of infill development opportunities. The District states that the Planning Department will have to change some of the current zoning. If there are no land use changes, there will be no opportunities for various options. The District understand that Measure U presents challenges but is prepared to address those challenges with the City.

8.2.2 San Bernardino County Homeless Partnership

The County of San Bernardino (County) Homeless Partnership manages and invests entitlement monies, such as HOME and ESG funds, and allocate them throughout participating jurisdictions. Participating cities may apply for these funds or be assisted through County-funded programs.

The County states that any City should appropriately zone for multi-family uses Jurisdictions should also be willing to look at non-traditional housing types (smaller units, ADUs, manufactured homes) that may be more cost-effective. For City of Redlands, the County suggests the apply land use while taking into consideration neighborhood characteristics. The City should also be familiar with different partnerships that are available for various funding sources. There are other methods to meet RHNA goals beyond single-family homes with single-family lots (traditional housing).

The County stated that partnerships can assist these populations. There are limited housing resources and partnerships can assist. The County would like jurisdictions lead housing projects (affordable housing or additional housing units), which includes partnering with the developer, partner with the community through the process to add affordable housing stock (community outreach) and provide financial support (alleviate economic burden). The City can apply what they used to do with the Redevelopment Agency. Instead of treating affordable housing like "any other development project", they have the ability to guide it through the system.

Finding a balance between new mandates to provide housing and what land is available to absorb these new housing units. This may be met by assisting elected officials and residents explore different types of housing developments that are not considered "traditional". Through community outreach, similarly to this stakeholder interview, the City can identify areas and places that may be best for new housing units. ADUs may help meet housing goals and provide alternative living situations for various circumstances. There should also be a mutual understanding that housing does not pay for services, so the City should be understanding of the economics associated with units, such as fire, police, etc.

8.2.3 Redlands Area Interfaith Council

The Redlands Area Interfaith Council (RAIC) brings groups of people together to interact with one another, acting as an educational group. RAIC also brings in various speakers to these members to inform them what is happening in their community.

RAIC believes the real challenge to building more housing is due to local opposition to low-income housing units. RAIC recognizes that affordable housing plans are needed and has noticed that many lower-income housing units are placed in one area, specifically the West Area, which exacerbates problems there.

RAIC suggests spreading affordable housing units throughout Redlands but is unsure if voters would pass this. RAIC mentions that there are no shelters or active shelters in the City of Redlands. RAIC believes the most vulnerable population are people experiencing homelessness, low-income households, and young families/single-family households. RAIC occasionally works with nonprofits, who are directly engaged with these communities, and knows it is difficult to find affordable housing for these populations. RAIC notes that there is no support system for these individuals and also mentions veterans as a vulnerable population.

RAIC believes apartments are the most affordable way for families to live. However, most of the apartment complexes in Redlands have been controversial. RAIC notes the geographic spread of new apartments, and also states that having walkable neighborhoods would help. RAIC notes that residents of North-west Redlands do not live close to a grocery store, and that transit opportunities would also be beneficial.

RAIC also believes that the homeless population should be a priority, especially in regard to semi-permanent housing, and states that the greatest challenge will be working with the residents. It has been difficult to bring them on board for housing growth. Redlands residents enjoy the characteristics of a "slow growth" and "small-time feel town". RAIC suggests focusing on the bigger picture, utilizing more intensive focus groups, increased community outreach, and in-person education. It is also important to remove the image of "outsiders" coming and telling the community what to do—local developers should be involved with development.

8.2.4 Family Service Association of Redlands

Family Service Association of Redlands (Family Service) is a small to midsize nonprofit that provides emergency housing support, emergency food, transportation assistance, daily meals, bus passes, and education assistance. Their emergency rental assistance program helps fight and prevent homelessness by providing emergency financial assistance to families facing eviction or who are behind on rent.

Family Service states that the core problem is affordability of homes. For minimum wage workers, if they experience a financial crisis (sickness, caregiving, funeral, etc.), it will affect their paycheck and send them "down a spiral." There is a need for more affordable housing stock. Family Service recognizes that affordable housing is costly and not cost-effective, and states it may be helpful to find a developer to create construction for affordable housing.

The most vulnerable populations are households with children under 18 with fixed income at, below, or slightly above poverty line; people experiencing homelessness; and elderly and disabled individuals with fixed incomes. A recent point-in-time count shows a 95% increase in elderly/disabled individuals experiencing homelessness.

Family Service believes that focusing efforts on creating affordable stock by working with HUD or other partnerships can assist these populations. Another way to assist would be providing resources, such as land or financial support. Family Service does not have land, so they work with landlords to get their clients into housing. However, finding housing that aligns with the individual's budget is difficult due to rising costs of apartments. Thus, families are sharing homes, which leads to overcrowded homes and makes children more vulnerable to sex abuse. Currently, Family Service is in the process of creating the tiny homes and hopes both the City and residents supports this project.

Family Service believes resident perception and resident pus back may be the greatest challenge. Currently, the perception amongst residents is that affordable housing will be an eyesore to the community, and that there is a stigma of lower incomes being correlated with "bad people." Family Service would like to encourage the City to continue to push forward with their efforts for development, especially for vulnerable families. With the COVID-19 pandemic, there is a need for change to develop and have housing stock.

8.2.5 Northside Redlands Visioning Committee

The Northside Redlands Visioning Committee (Committee) is a grassroots organization formed after the termination of the Redevelopment Agencies. The Committee believes that, through policy, it may be possible to develop tax credits for developers. This creates an incentive for developers to build affordable

units. The Committee also believes easing conditions for approval for housing tracts that are being considered will help build more housing. For example, a percentage of units should be dedicated to affordable units or for various income levels. The Committee urges for new, innovative methods to address housing crisis. For example, creating a First-Time Home Buyer Program will assist in building homes as well as be a starting investment for young families.

The Committee believes the wage earners (blue collar, service industry), unhoused seniors, and people experiencing homelessness are the most vulnerable populations. The Committee feels it should be easier for blue collar workers to live and work in the same city. The Committee would like to see consideration for workforce housing, housing that accommodates regional transportation, and different incentives for First-time Homebuyers.

The Committee feels that the greatest challenge is a lack of access to affordable housing. Another challenge is that developers are not invested in the community. They are tasked to develop and receive fee waivers/incentives. The Committee would like to see investment in the community that is directly applicable to the community rather than for the sake of investment.

8.2.6 East Valley Association of Realtors

The East Valley Association of Realtors (EVAR) is a collective association that is engaged in policy making and advocacy, focusing on State and local policies. EVAR would like to focus density in the downtown core area of Redlands. He recognizes that it is not possible to build affordable housing on Sunset Drive. He would like to look at underutilized areas in the City. For example, the Redlands Mall is not a thriving center and there is not much demand for the retail and commercial space. EVAR would like to push for vertical, residential development in the downtown area. Another strategy is to have more mixed, affordable units within the same neighborhood. For low-income households with subsidized housing, it could include more dense development.

EVAR believes the marginal communities in North Redlands, such as lower-income households and people of color, are the most vulnerable. They already live in overcrowded homes or have not been able to pay rent. EVAR believes that people experiencing homelessness with mental health issues as well as veterans are a vulnerable population in terms of having affordable housing.

For moderate-income households, density growth may assist in affordability and may not cost much to subsidize the construction of these units. The possibility to achieve these is greater than developing single-family homes. For low-income households, the City can pursue grant funding and bond funding through State or County funds. This can help subsidize development costs for low-income households. They City can also reform permit processing, streamlining process (which induce significant costs of construction). EVAR suggests that creating flexibility in zoning for underused commercial buildings to be used for residential housing can also assist. For example, a big-box retail space could potentially be converted into a mixed-use or fully residential development. These existing spaces already have the services, such as electricity, water, and sewer, needed. EVAR states the greatest challenge is the perception residents of Redlands have regarding affordable housing, or housing developments in general.

8.2.7 Building Industry Association

The Building Industry Association (BIA) SoCal Chapter is composed of homeowners, subcontractors, contractors, engineers, trade contractors, plumbers, etc. (people involved in the "home building industry"). Their primarily function is to advocate for housing for all socioeconomic levels. They host an annual housing policy conference to provide legislative updates as well as provide a space for collaboration for resources to Cities that may need assistance in local policy reformation.

BIA would like to see the permanent removal of the ballot imitative that capped development to 300 units per year (SB30 for City of Redlands), and agrees with State legislation that came in to require housing. An array of zoning densities may be another strategy to meet housing goals. Diversifying housing stock, especially looking to fortify 4,500 square lots, will assist the City. Other desired items include relaxed design requirements because design fees make it more difficult to obtain/construct housing for people of all financial backgrounds.

BIA believes that low-income population is most vulnerable because it is difficult and costly to build affordable housing, and notes it is also challenging to build when a community does not want additional development. BIA suggests that churches can identify surplus church land can provide an opportunity to do infill projects. Any collaboration is necessary to see available land opportunities. BIA refers to different models (City of Riverside, Placentia, Bellflower, etc.) where they leased surplus property from churches, noting that affordable housing for seniors could be built there. BIA also encourages the City to look at prior examples done by different cities.

Finally, BIA noted there is push back to new development. In terms of addressing the community, it is helpful to conduct quarterly focus groups (working groups) for best practices with the City. BIA currently meets with the City of Ontario on a quarterly basis to have a dialogue about fees, delays, etc. so both parties have a mutual understanding of the development process.

8.2.8 Inland SoCal United Way

Inland SoCal United Way (ISUW) comprises three organizations that have merged (United Way of the Inland Valleys, Inland Empire United Way, and Community Connect). ISUW states that educating the public will best assist the City to meet their RHNA goals. NIMBYism is prevalent, and ISUW feels that educating the public will help shift public perception. ISUW states that meeting cost of living wages will greatly assist in housing. They both agree that living wages correlate to housing.

ISUW feels that the most vulnerable populations are those in extreme poverty. ISUW would like to address homelessness by avoiding homelessness in the first place. ISUW would like to see if businesses could be encouraged via credit to hire folks with that living wage. This leads to re-investment into the community and community building. Workers would be able to live and work in the City. ISUW states that there are available funds for rental assistance and should allocate these funds to assist housing issues. Another way to assist these populations is to build affordable housing.

ISUW identified challenges to housing production that included difficulty in construction, whether due to permitting or with construction delays. Another challenge is the counter intuitive policies set in place.

8.2.9 Inland Temporary Homes

Inland Housing Solutions (IHS) is a nonprofit organization that provides rapid rehousing services, emergency rental assistance, and are service providers for people experiencing homelessness. IHS believes the best strategy is by addressing the need for affordable housing development and to be in agreement with strategies laid out in the County of San Bernardino. IHS states that the City needs to be more strategic in placing affordable housing. They should place these units in areas that are undeveloped. For example, scattered site housing should be implemented, instead of place all affordable housing units in one area in the City. IHS also would like to advise that additional housing requires additional services, such as police, safety, roads, commercial, etc. so the City should be strategically while taking all these aspects into consideration.

IHS believes that the low-income earners are the most vulnerable population. Specifically, those who are employed in the service, hospitality, and retail sectors of the economy who make minimum wage. It is difficult to maintain cost of living with minimum wage jobs, and Redlands becomes cost prohibitive if the individual is the main provider for the family.

In terms of housing, IHS believes the City should utilize the current housing they have and utilize underdeveloped/undeveloped and that a city cannot build their way out of homelessness. IHS believes that having a study conducted that gathers information regarding homeless individuals, such as where they originated, if they are Redlands locals, and if they attended Redlands High School. This can feed into marketing to change public perception. This can also feed into the targeted populations and how to address their specific needs. IHS suggested that the City could possibly create three models that are pre-approved which relates to faster, more accessible construction of ADUs. The City can also assist in allowing easier permits, fast-track processes, and flexible plan checks to expedite ADU developments. IHS stated the greatest challenge to new housing in the City is the restrictions due to environmental land and the building affordable housing with requisite services.

8.2.10 University of Redlands

The University of Redlands is a private institution for higher education with approximately 5,000 students. They are located in the TVSP and own approximately 30 acres of undeveloped land. The University of Redlands would like to push a mixed-use village, not so focused on university house, for the transit-oriented station that aligns with the goals of the City of Redlands' TVSP.

University of Redlands believes the best strategy is through redevelopment or infill development of sites such as the Redlands Mall and University Village Site. Garden style apartments and single-family homes seems to be more accepted by the public. There is also potential in the under-utilized spaces in downtown for the City to meet current housing goals. Three-to-four story buildings were stated as the best fit for character of Redlands.

University of Redlands believes that breaking down the barriers for housing for low-income households are required. There is a need to increase the supply for housing that is attainable to the 50-80 percent AMI population. Expediting approval processes and improving policies that can specifically target and address these issues can be helpful. For the lower-income population, there are tax credits and bonds that are currently assisting their needs.

Public perception is a challenge in terms of housing needs. Educating the public and helping them understand that density is not equivalent to high-rises will be greatly helpful in public acceptance. Another challenge is the growth control measures and its corresponding impacts to development. Instead of removing growth control measures, revisions and reformed are required. University of Redlands is also concerned about the flood zone affected development, due to the increased cost of mitigation.

8.2.11 Redlands Chamber of Commerce

The Redlands Chamber of Commerce's (Chamber) mission is to advocate for local businesses and help create a better business environment. The Chamber states the demographics of the community has shifted. In the Chamber's experience, many households are not looking to buy a home. With that, the Chamber notes that density can help the City meet their RHNA goals, and that the TVSP be ideal if development is done correctly. The Chamber notes there is not much land left for development under current zoning. Rezoning of commercial sites could hurt the local businesses.

The Chamber notes that North Redlands consists of mostly minorities, while South Redlands is mostly white. The Chamber also notes that most of the service providers and nonprofit organizations are located and serving the Northside. The Chamber broadly states that housing credits to certain populations can assist with those vulnerable populations obtain housing, and that anything would be helpful versus doing nothing.

The Chamber recognizes that one of the greatest challenges is identifying where to build future housing. Infrastructure poses another challenge. For example, public transportation is available in the City of Redlands, but is not located near the underserved population. It is difficult to reach current, existing bus stops to where they are currently located. The "donut hole" (unincorporated Redlands) has higher density for housing, has existing public transportation, and apartments with amenities. The Chamber would like to see some of those aspects incorporated into Redlands proper, specifically within the TVSP. The Chamber notes the southern portion of the City would be a perfect location for housing because infrastructure (roads, electrical lines, gas lines, etc.) is already available in that area.

Public perception can be a challenge, but the Chamber believes this challenge can be ameliorated. The Chamber notes there was discord between the public and Council with Measure G (redevelopment of the Redlands Mall). The public advertising created only addressed one item, rather than the five items. The Chamber believes Measure T was supported because it was developed through a citizen oversight committee. While a committee can only provide recommendations to the City Council, a committee may help the public lend more trust in future housing and land use related measures.

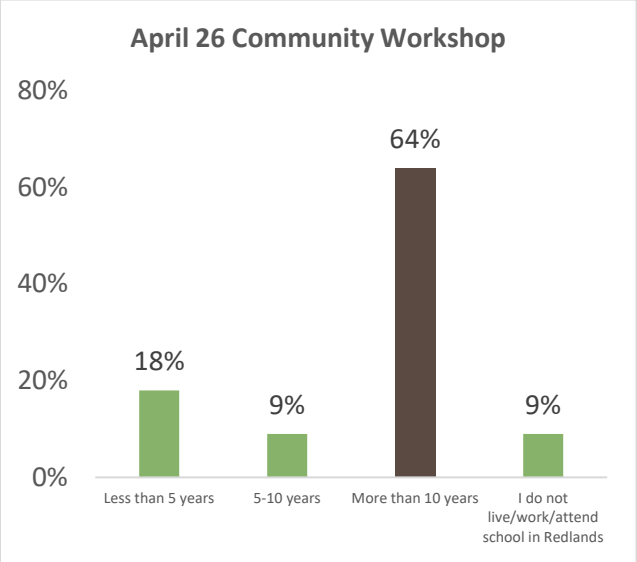
8.3 COMMUNITY WORKSHOPS

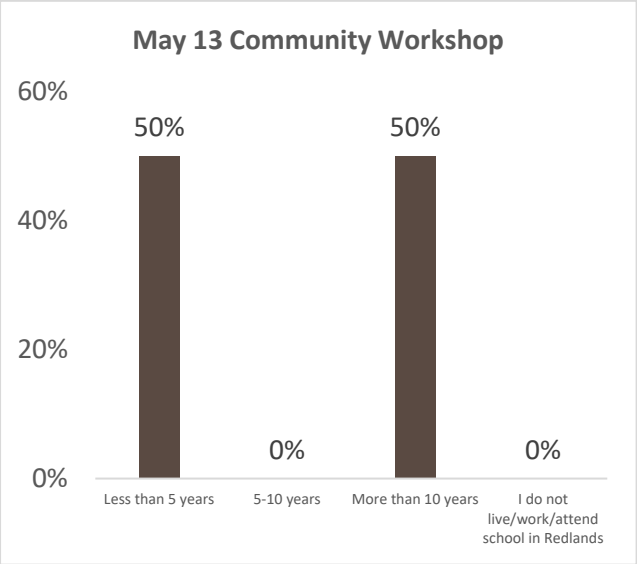
The City of Redlands held two Community Workshops for the Housing Element update. The first one was held on **Monday, April 26 and had 11 attendees** from the public. The second one washeld on **Thursday, May 13 and had six attendees** from the public. The public asked several questions regarding the Housing Element update at both meetings.

8.3.1 Survey Questions at Community Workshops

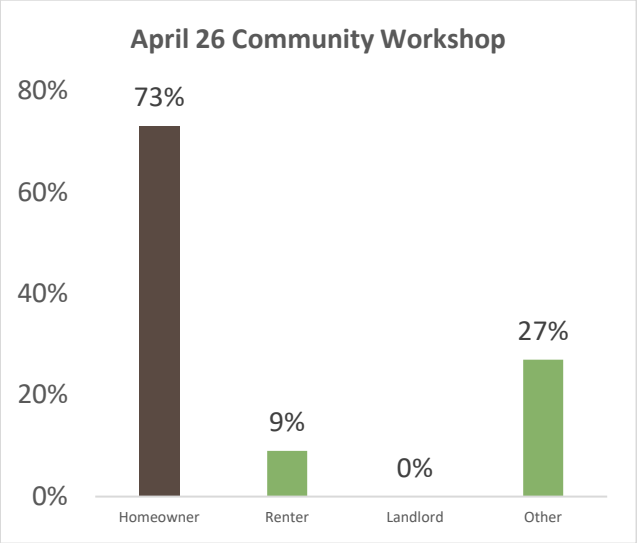
Below are the survey questions provided to the participants at each workshop, followed by questions the participants ask in the Workshops Q and A boxes.

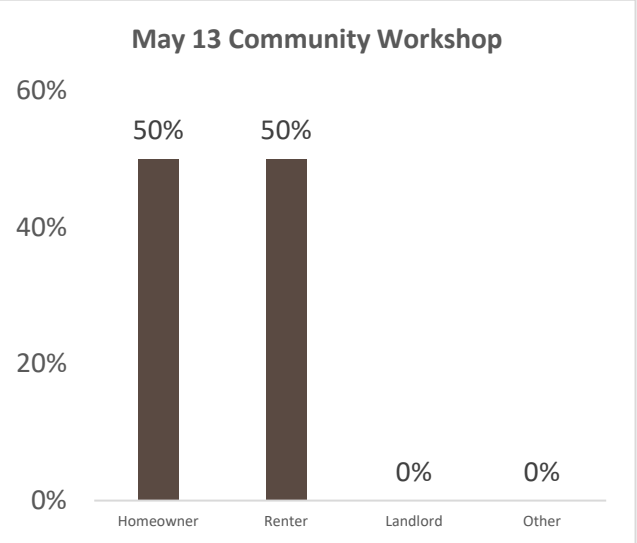
How long have you lived/worked/attended school in the City?



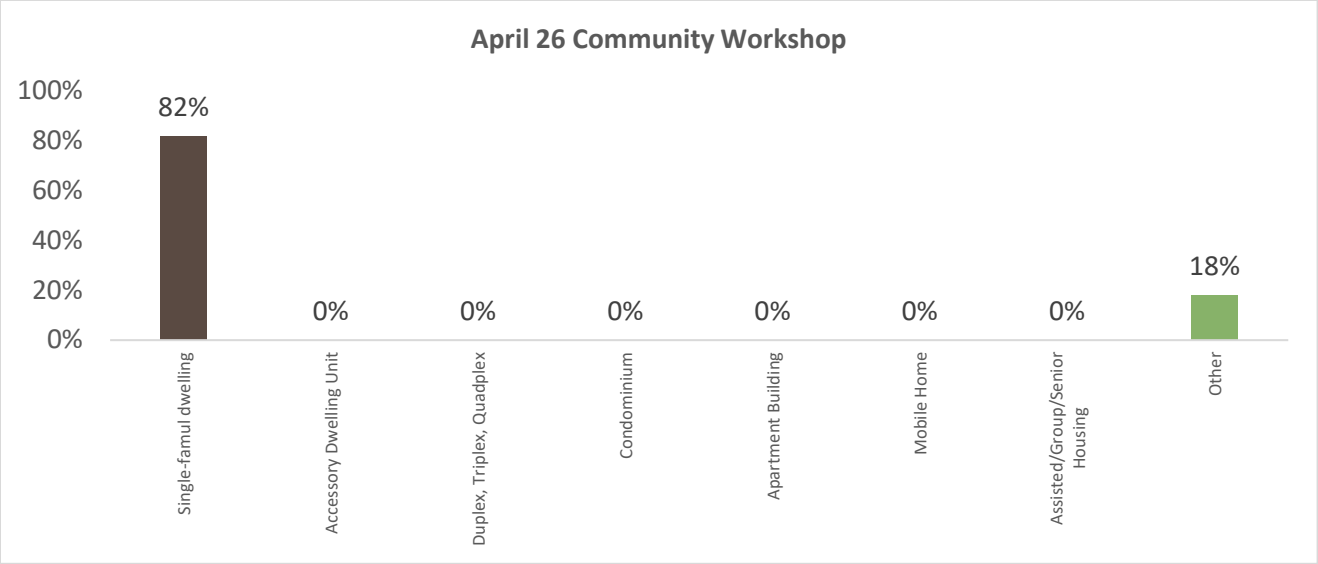


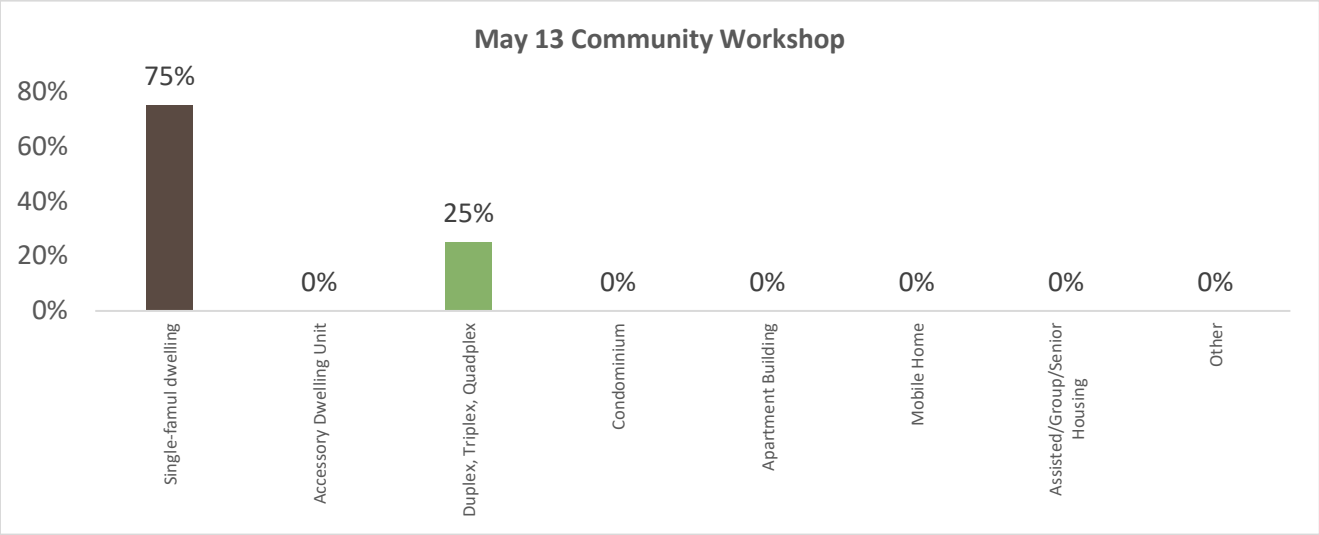
Are you a homeowner, renter, landlord, or other (please select all that apply to you)?



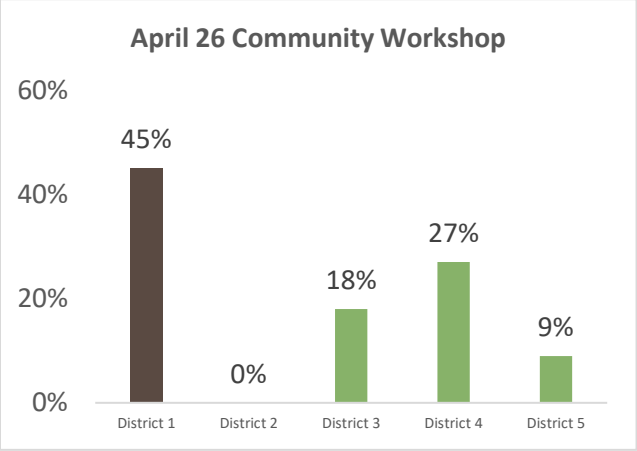


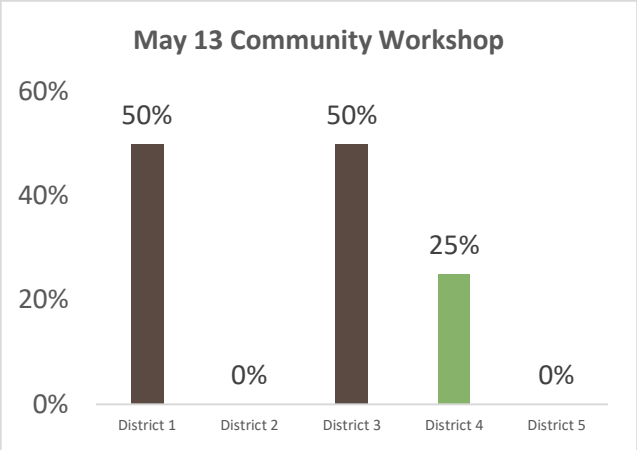
What type of housing do you live in?



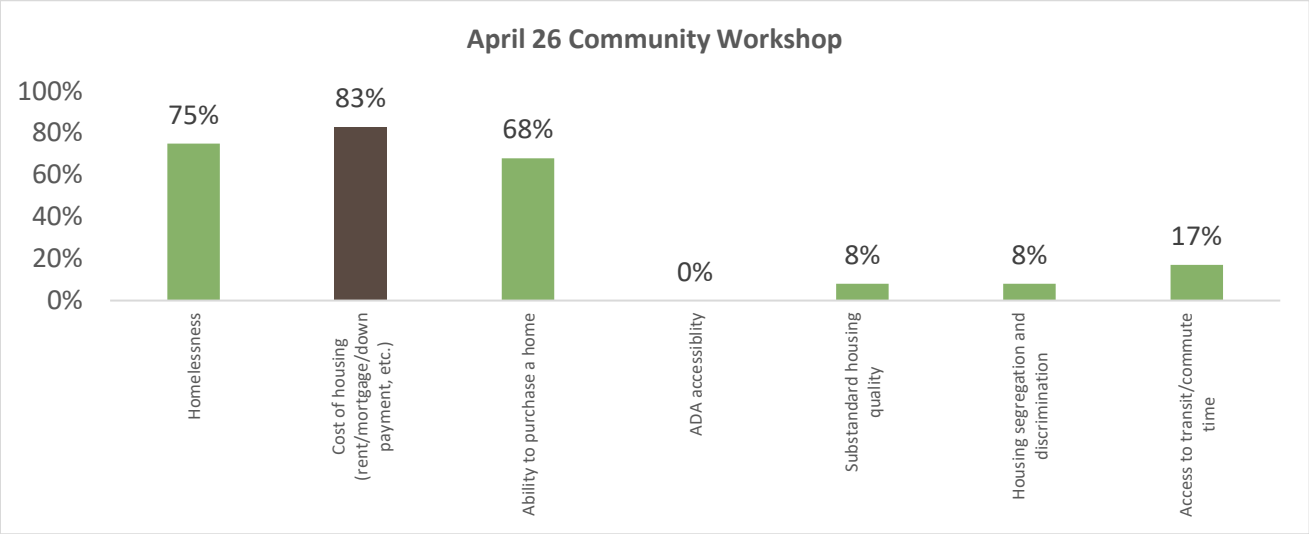


Where in Redlands do you live?

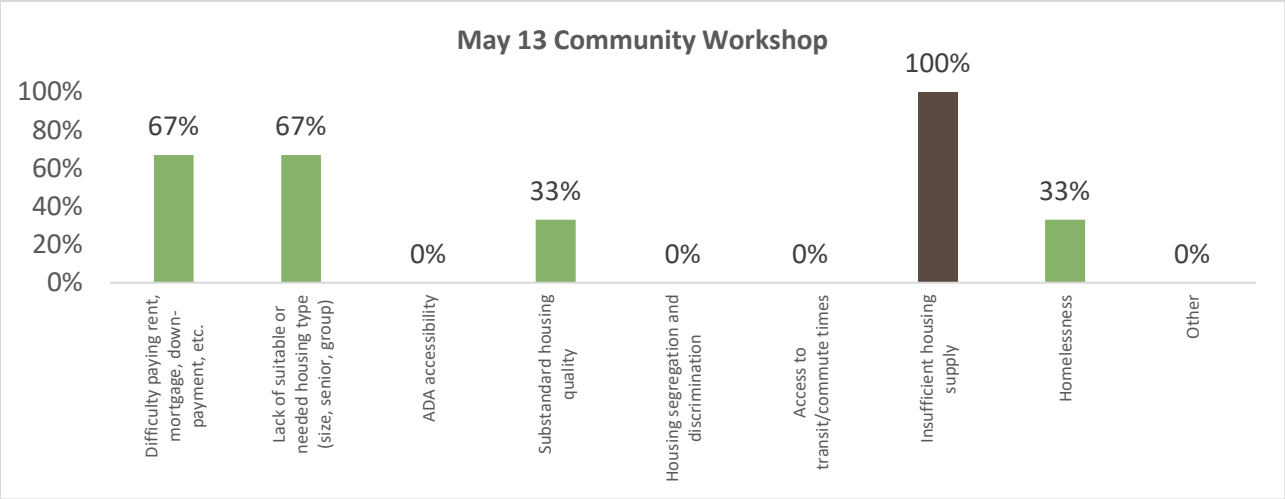




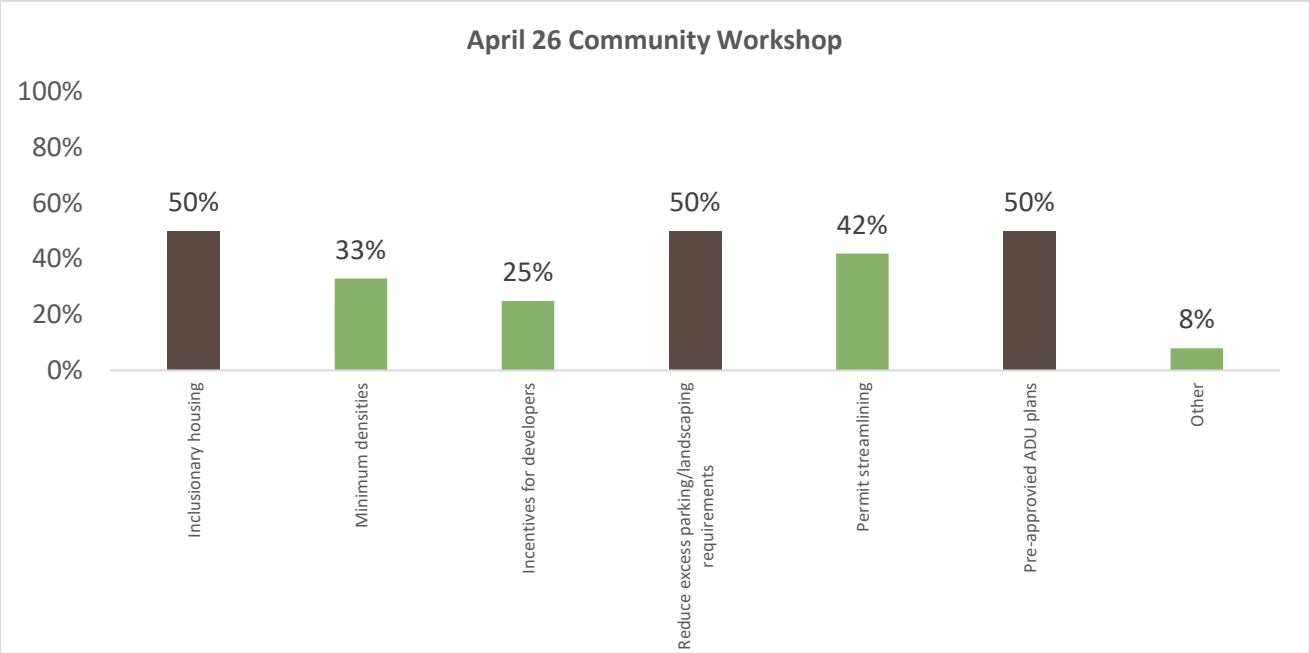
Please select the top three (3) housing issues facing people in the City of Redlands (multiple choice).



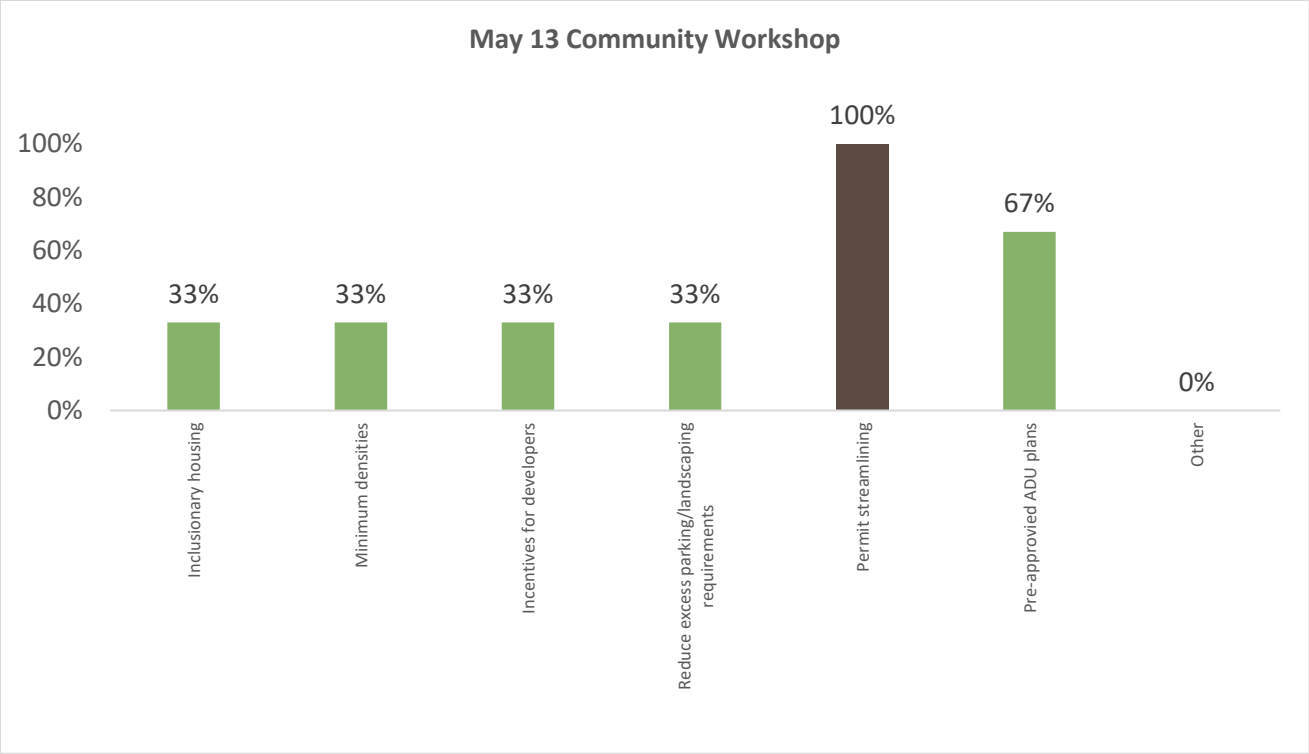
Other: Housing close to local jobs



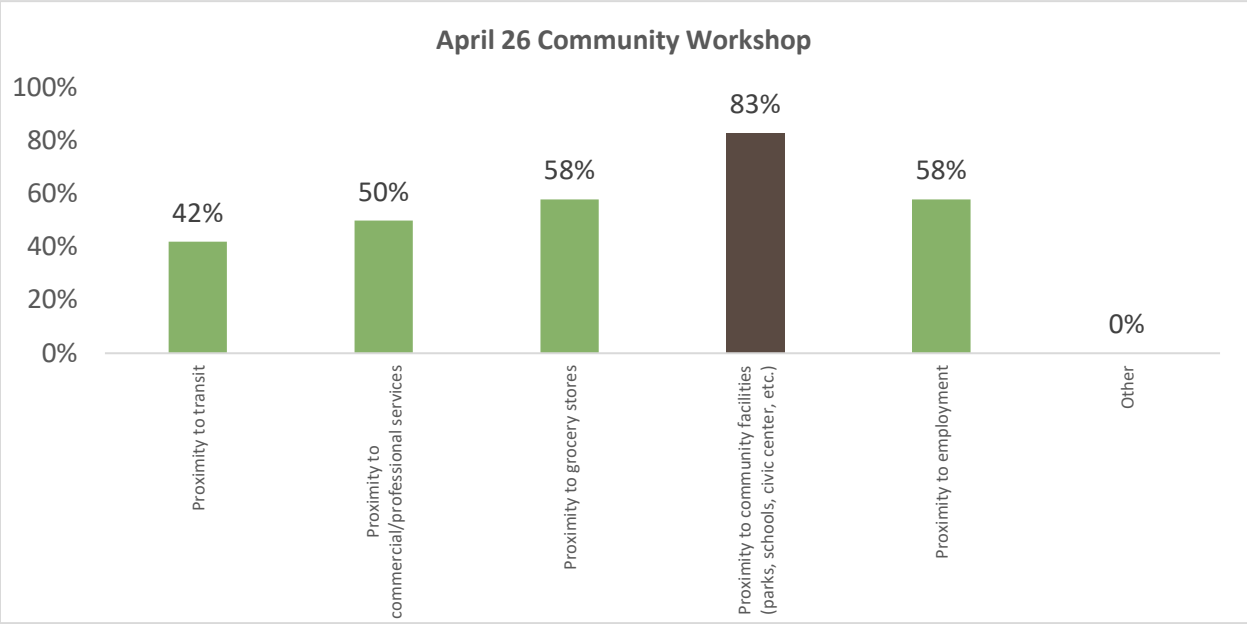
Please provide your top three (3) programs to improve housing access in Redlands (multiple choice).

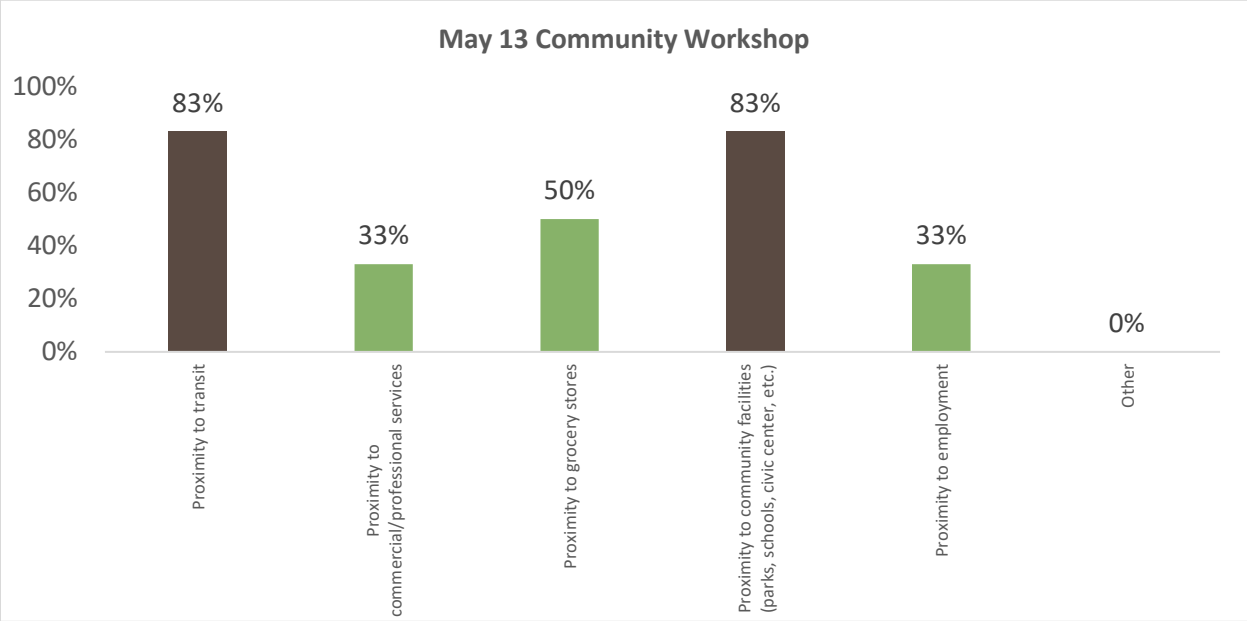


Other: Updating the City ordinances to be more in-line with what is currently going on. Provide assistance to purchase homes



What are your top three (3) most important criteria for selecting land for housing (multiple choice)?





8.3.2 April 26 Q & A Box

Is there anything that we can do to extend public transportation to the East end of the city / Mentone?

- As noted, transit services currently end at the University of Redlands. However, proximity to employment is very important, as transit follows routes to reach the most riders. With development surrounding the potential Arrow Rail stations, potential ridership may increase in a

way that would make transit to Mentone more likely. Omnitrans is in charge of transit within the County of San Bernardino, and participants are suggested to direct questions or suggestions for new services to them. The City will forward this comment to Omnitrans.

How many of the transit stops provide 15-minute or better service frequencies?

- The City does not have that information at present. The majority of stops within the half mile buffer have a 20-minute leeway. A few meet the 15-minute leeway. Commenters are directed to Omnitrans for specific service information.

Although accessibility has not been ranked as a high concern, what is the impact to having ADA accessibility as a requirement? It seems like building in accessibility is less expensive than retro. It could be a selling point for developers since accessibility allows access to small children, wounded vets, and the elderly.

- Agreed, increased accessibility increases access for seniors and children. Building retrofits are done so with accessibility in mind. It is worth looking at programs to increase accessibility in the Transit Village Specific Plan Area. At present a 3-story residential building is the tallest type of building that does not require an elevator within Redlands. To encourage further accessibility, there could be a City program to increase elevator access in 3 story buildings that already exist or may potentially exist in the future.

Are there any community centers or senior centers planned for the East end of the city? There is much housing developed there but it appears most services are still concentrated near the commercial sector.

- The City is not aware of new facilities for seniors in the east side of the City. The City can share that comment.

How is the homeless population distributed across cities in Southern California? Does a government agency assign them to cities, or they move to the area they like?

- Homeless populations are not governed by anybody. They self-select where they would like to be, but generally congregate near areas of transit, services, or areas they are familiar with. There are no governmental controls regarding homeless populations.

Will denser development increase local transit frequency?

- Ideally, the two go together. Greater densities allow for greater ridership, which allows for greater transit frequency. The two are complimentary factors, but one does not necessarily cause the other. The City is looking to marry those two as best they can.

Since business provides more revenue than city expense and residential is opposite, is there planning to balance residential with commercial? This would limit need for transit, too.

- Commercial uses do not necessarily increase revenue. Residential uses require more in infrastructure than in terms of revenue, but they should not all be lumped into one category. In some cases, single family residential development has higher maintenance costs due to larger amount of utilities required for each unit. Multifamily development, like commercial, tends to pay for itself.

Has the City looked at what resources Omnitrans would need to increase transit service frequencies and extend service to the eastern end?

- It is part of the City's regular process to route proposed developments to Omnitrans for comment and how the project would/could integrate into the Omnitrans network. There is coordination between agencies.

Are the proposed high density / low-income housing areas close to similar income employment opportunities?

- Any proposed developments that would meet HCD standards for low-income housing are generally located near employment opportunities, as seen on the web-map. Most low-income areas are located in the East Valley Corridor and is well covered by existing services.

Will the Redlands mall get the Measure U exemption? Is MBI helping with that?

- The Redlands Mall will be discussed at Tuesday's Planning Commission meeting, and MBI will not be involved with that project.

Just a comment responding to an earlier question. There is a Library & Senior Center in Mentone (operated by the County) that can serve Redlands residents on the east side of town.

- The Library and Senior Center of Mentone will be added to the web-map.

8.3.3 May 13 Q & A Box

It's disappointing that there is no average income housing planned for within the transit villages specific plan

- Dan Wery noted that HCD utilizes density as a proxy for income levels. For instance, 30 dwelling units to the acre would be suitable for low-income housing, while 12 units to the acre would be suitable for moderate income housing. Thus, the housing planning within the Transit Villages Specific Plan would be planned for (as the City merely has to plan for, not construct, housing) 30 dwelling units to the acre in order to accommodate housing at all income levels within this part of the City.

8.3.4 GENERAL THEMES

A few common themes emerged from comments received at both public outreach meetings, including the following:

Affordability is a priority. Several participants questioned if more affordable housing will be constructed in the City in the near future, and how these affordable units will be distributed across the City.

To address the issue of affordability, the City will undertake Program 1.1-3 to amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower-income household on sites previously identified in the past two Housing Element cycles, and Program 1.2-4, a Single Room Occupancy Ordinance to provide additional housing opportunities for low- and very low-income households near the planned Metrolink Stations. The City will also undertake several programs to assist with the construction of affordable Accessory Dwelling Unit construction, and will also undertake Program 7.3-2, which calls upon the City to Study and consider the adoption of an inclusionary housing ordinance. Additionally, Program 1.5-9 calls upon the City to continue to implement the Mobile Home Rent Control ordinance to prevent displacement of lower-income and at risk populations.

Homelessness and assistance for those near homelessness is also a concern. There is a need for permanent supportive housing and temporary housing for those suffering from homelessness and for those with disabilities. Also mentioned was a synergistic need for increased social services in tandem with housing solutions.

To address this issue, this Housing Element contains Program 1.2-1 to address emergency shelters, Program 1.2-2 to provide opportunities for Low Barrier Navigation Centers in the City, and Program 1.2-3 to address supportive housing. Program 1.2-4 will establish a Single Room Occupancy Ordinance to provide additional housing opportunities for low- and very low-income households near the planned Metrolink Stations. Program 1.2-5 has been included to implement mitigating strategies to remove potential constraints on the production of large group homes. Additionally, Program 1.3-7 would administer County funds to service providers including local nonprofits in coordination with City Police Department Homelessness Liaison.

There is community opposition to high density housing in the City. This presents a large constraint, as there are preconceived notions regarding affordable housing and those who would occupy affordable units. The general attitude of the community is one of the most frequently mentioned constraints by stakeholders.

Program 1.5-4 has been included in this Housing Element, calling upon the City to Continue to implement the Mobile Home Rent Control ordinance to prevent displacement of lower-income and at-risk populations. The City will implement program 1.6-1, through which the City will promote incentives and tools available to facilitate ADU construction. Provide easily accessible information on the City's website, at the zoning counter. Coordinate with SBCTA to utilize regional resources and adopt policies, procedures, and standards consistent with neighboring jurisdictions to streamline ADU applications. Additionally, Program 7.5-3 calls upon the City to publicize Fair Housing Information, including information about tenants' rights, landlord requirements, and recent litigation on the City's

website, social media platforms, and through physical promotional material (e.g., flyers, posters) to inform the community about Affirmatively Furthering Fair Housing.

There was repeated concern regarding the siting of new housing units, especially in conjunction with the Transit Villages Specific Plan and existing transit options. At present, most transit services terminate in Redlands given its position in the Inland Empire. Most stakeholders expressed a desire for new units to be well-connected to existing services and established transportation routes.

Programs 1.1-2 and 1.5-8 has been included in this Housing Element to provide additional capacity for residential development in the City's highest opportunity areas through the Transit Villages Specific Plan (TVSP). Adoption the TVSP by the end of 2022 aims to allow for greater residential development around the three new light rail stations. The City will use the TVSP to facilitate smart-growth planning principles, downtown revitalization, and infill development. Additionally, Programs 1.2-12 and 1.2-13 will amend the zoning ordinance for C-3, C-4, and A-P zones to clarify mixed-use requirements, clarify the requirements and allowances for mixed-use and residential development in these zones, create objective standards for mixed-uses, and, as appropriate, change the zoning standards to encourage commercial recycling and residential development in these zones.

Concerns were raised for the ability of young families to afford to live in Redlands, with mentions of the need to build equity in the community, either through tiny homes or accessory dwelling units.

Programs 1.6-1, 1.6-2, 1.6-3, and 1.6-4 have been included in this Housing Element to more easily provide alternative housing typologies such as accessory dwelling units (ADUs) that have the potential for housing families. Program 7.1-1 incorporates the City's requisite rezoning to accommodate 1,898 very low and low income units, 782 moderate income units, and 1,538 above moderate income units, units that could potentially be utilized as starter homes for young families seeking to build equity. Additionally, Program 1.2-7 calls upon the City to amend parking requirements, open space standards, and setbacks for multi-family properties to further incentivize and encourage higher density development.

Participants have stated that land use restrictions, including those implemented through Measure U, are a hinderance for further housing developments, especially affordable housing developments. Additional constraints mentioned by the public included permitting difficulties and construction costs.

Programs 1.2-14 and 1.2-15 have been included to reduce permitting requirements for new housing in the City, such as removing the CUP requirement for buildings taller than 35 feet, and waiving pre-application meeting fees and providing technical assistance to projects that propose to provide below market-rate units. Program 1.2-16 aims to provide information and maps of known environmental constraints at the zoning counter to provide additional clarity and certainty and mitigate non-governmental constraints for project applicants. Additionally, Program 1.6-2 makes a variety of example ADU plan sets available to facilitate reduced applicant cost and expedited review for ADUs. Ensure example plans provide choices and diversity in size to accommodate a variety of household sizes and types.

8.3.5 Policies

To address affordability, Program 1.1-2 would allow for by-right approval of projects with 20 percent affordable units on a "reused" Housing Element site. Additionally, Programs 1.6-1, -2, -3 and -4, will allow for the development of ADUs, including affordable ADUs.

To address homelessness, the City is adopting Programs 1.2-1, -2, -3, -4, and -5. These programs are meant to facilitate the development of emergency shelters, low barrier navigation centers, transitional housing, supportive housing, single-room occupancy units, and group homes in order to provide for a variety of housing typologies to shelter at-risk populations. Programs 1.3-7 and -8 are added specifically to administer CDBG funds to service providers including local nonprofits, and to continue assisting in connecting homeless individuals to local service providers, as well as continue funding shelter beds with available grant funding and donations.

To address Measure U and community opposition, Program 1.1-1 will allow for the necessary rezonings to allow for new housing developments that could be permitted without discretionary action. Program 1.1-2 will allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. Program 1.2-13 will remove the current CUP requirement for buildings over 35 feet. These programs will provide the necessary land use and zoning framework for the City to develop a variety of housing types at densities that can support moderate and lower-income units, which could be permitted on a regular basis without the need for a General Plan Amendments, CUPs, or other politically sensitive actions. Additionally, Program 1.1-2 would allow for by-right approval of projects with 20 percent affordable units on a "reused" Housing Element site.

To address the siting of new housing units, Program 1.1-1 will allow for the necessary rezonings to allow for new housing developments that could be permitted without discretionary action. Program 1.1-2 will allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. These programs will focus future housing development in the City closer to existing transit options, such as bus and rail, as well as exiting job centers, such as downtown Redlands, the University of Redlands, and the Esri campus.

To address the building of equity, Program 1.3-2 is added to study the viability of an inclusionary housing ordinance. Program 1.4-1 is added to preserve at-risk publicly housing units, while Program 1.5-9 will continue to implement to Mobile Home Rent Control ordinance to prevent displacement of lower-income and at risk populations, continuing to allow these populations to build equity.

To address land use restrictions, such as Measure U, Program 1.1-1 will allow for the necessary rezonings to allow for new housing developments that could be permitted without discretionary action. Program 1.1-2 will allow for greater residential development around the three new light rail stations, and implement objective design standards with a form-based code. Program 1.1-5 would require minimum densities to ensure residential projects are developed close to their maximum densities.

Michael Baker
INTERNATIONAL

Appendix D: Zoning Code Abbreviations

Zoning Code	Zoning Designation
A-1	Agricultural
A-1-20	Agricultural
A-2	Estate Agricultural
R-R	Rural Residential
R-R-A	Rural Residential Animals
R-A	Residential Estate
R-A-A	Residential Estate Animals
R-E	Residential Estate
R-S	Suburban Residential
R-1	Single-Family Residential
R-1-D	Single-Family Residential
R-2	Multiple-Family Residential
R-2-2000	Multiple-Family Residential
R-3	Multiple-Family Residential
A-P	Administrative & Professional Office
A-P-C	Administrative & Professional Commercial
M-F	Medical Facility
E	Educational
C-1	Neighborhood Stores
C-2	Neighborhood Convenience Center
C-3	General Commercial
C-4	Highway Commercial
C-M	Commercial Industrial
M-P	Planned Industrial
M-1	Light Industrial
I-P	Industrial
M-2	General Industrial
P	Off Street Parking
O	Open Land District
T	Transitional District
A-D	Airport District
HD	Hillside Development
C-D	Civic Design District
FP	Flood Plain District

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

November 15, 2021

Brian Desatnik, Director
Development Services Department
City of Redlands
35 Cajon St.
Redlands, CA 92373

Dear Brian Desatnik:

RE: City of Redlands' 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Redlands' (City) draft housing element received for review on September 17, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 12, 2021 with you, Catherine Lin (Principal Planner) and your consultants. In addition, HCD considered comments from Dennis Bell and Josh Albrektson pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

The City's statutory deadline to adopt a housing element was October 15, 2021. For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

HCD appreciates the hard work and dedication Catherine Lin, Principal Planner, and your consultants provided during the housing element update. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Marisa Prasse, of our staff, at Marisa.Prasse@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF REDLANDS

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at http://www.hcd.ca.gov/community-development/building-blocks/index.shtml and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The review of past programs should report progress in implementation and evaluate effectiveness of programs in achieving goals and objectives. In turn, future programs should be revised as appropriate to better achieve program goals. In many cases, programs were not implemented in the 5th cycle housing element, and others were done so after the dates stated in the programs. The element should discuss the lack of timely implementation and what will be done differently in the 6th cycle housing element. In other cases, the element does not evaluate the effectiveness of programs and as a result, the element should be revised. Examples of programs that need additional information and evaluation include, but are not limited to:

- *Program 7.2-11 (Assist with Foreclosure Prevention)*: Describe and evaluate how frequently the City updates the foreclosure prevention resources and how many homeowners were assisted by the program.
- *Program 7.4-12 (Threshold and Conditional Use Permit):* Describe how the City evaluated the conditional use permit requirement and reached its conclusion that it has not been an impediment to multifamily development.
- *Program 7.5-4 (Senior and Handicapped Housing)*: Describe how many households were assisted under this use of CDBG funds.
- *Program 7.5-5 (CDBG Rental Rehabilitation)*: Describe how many households were assisted under this use of CDBG funds.
- *Program 7.6-1 (Buy-Out Assistance)*: Describe how the City implemented this program, what actions the City took, and how many units were assisted in the 5th cycle planning period.
- *Program 7.7-1 (Fair Housing Counseling)*: Describe how many households were assisted by fair housing counselling during the 5th cycle planning period.

In addition, as part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness). For more information, See HCD's Building Blocks at https://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Integration and Segregation: The element includes information on segregation and integration at the local level for race/ethnicity, disability, familial status, and income; however, the regional analyses for race/ethnicity and income need improvement, and some of the conclusions do not reflect the data. The data presented in the Affirmatively Furthering Fair Housing (AFFH) analyses and Housing Needs Assessment (Table 2.1-3 on p. 8) do not support the element's conclusions that the difference between the City and County's proportions of non-white Hispanic populations is similar. In addition, the local analysis of segregation by income should be clearer about the north to south patterns and trends. Furthermore, the City is significantly more affluent than the County (Table 2.4-1 p. 16), with 14 percent more of the population in the above-moderate income category compared to the County, yet this is not adequately analyzed or stated. The element should adequately analyze patterns and trends of segregation and integration, include a comparison of the City to the region, and consider other data options such as Census median income by block group. The element's summary of integration and segregation fair housing issues should be revised to reflect the data and analyses.

   Racial/Ethnic Concentrated Areas of Poverty (R/ECAP) and Affluence (RCAA): The element notes there are no R/ECAPs in the City. However, the City does have an area of High Segregation and Poverty according to TCAC/HCD Opportunity maps and should include specific analysis. The analysis should address trends, past and current efforts, including investment and their effectiveness, local data and knowledge, other relevant factors (as noted below), particularly relative to equitable quality of life, resources, and strategies to address any inequities in quality of life. The analysis should also consider any overlapping fair housing issues with other components of the assessment of fair housing (e.g., access to opportunity and disproportionate housing needs, including displacement). Furthermore, the element should analyze some of the census tracts that have significantly higher rates of white population and income as Racially Concentrated Areas of Affluence (RCAA). Adequate analyses of R/ECAPs and RCAAs will help guide goals and actions to address fair housing issues.

   Disparities in Access to Opportunity: The element provides some information on access to opportunity for education, economic, transportation, and environmental, but it generally lacks analysis. The analysis of education opportunity should explain differences in school quality from neighborhood to neighborhood and include comparisons of the City to the

region for education, economic, transportation, and environmental opportunity. In addition, the analysis of environmental opportunity across neighborhoods should match the CalEnviroScreen data presented, which shows clear disparities between census tracts, and should analyze differences in environmental hazard exposure between census tracts. Please refer to page 35 of the AFFH guidebook (link: https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance) for specific factors that should be considered when analyzing access to opportunities as it pertains to educational, employment, environmental, transportation, and any factors that are unique to Redlands.

Disproportionate Housing Needs, Including Displacement: The element does include some information on overcrowded households, substandard housing conditions, homelessness, and cost-burdened households, but it must also analyze spatial trends of substandard housing conditions and homelessness. Furthermore, the displacement analysis should consider (1) any overlapping fair housing issues with other components of the assessment of fair housing (e.g., access to opportunity and disproportionate housing needs, including displacement), (2) displacement risk from environmental hazards such as flood zones, and (3) displacement risk of new transit investments and upzoning to existing low-income census tracts in the absence of substantial affordability and anti-displacement programs.

Local Data and Knowledge and Other Relevant Factors: The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. The element should analyze historical land use and investment practices or other information and demographic trends. While the element includes some information on the history of Redlands (pp. 215-216), it should also describe historic spatial patterns of segregation (ex: spatial patterns of racially restrictive covenants, historic patterns of where residents of different racial/ethnicity backgrounds lived, historic preservation districts, etc.), the environmental justice impacts of the siting of infrastructure and industrial uses, the City's history of anti-growth land use measures, and the lasting impacts of these actions.

Contributing Factors: The element must list and prioritize contributing factors to fair housing issues. While the element includes a list of 11 contributing factors, these factors should be prioritized based on the outcomes of a complete analysis. In addition, some of these contributing factors seem detached from the Assessment of Fair Housing analyses, while other salient fair housing issues identified in the Assessment of Fair Housing are missing from the list of contributing factors (e.g., North/South segregation by race/ethnicity and income, regional patterns of segregation by race/ethnicity and income, anti-growth and land use constraints). Finally, some contributing factors identified in the element lack adequately responsive programs (these include, but are not limited to displacement and increasing rents, community opposition).

Site Inventory: The element includes maps and graphs of the site inventory that indicate a further entrenchment of existing fair housing issues, and the site inventory is not

accompanied by adequate programs to ameliorate these impacts. Furthermore, some of the conclusions in the AFFH site inventory analysis do not reflect the data – the transit villages areas are not high opportunity areas according to the TCAC/HCD opportunity maps, but rather shown as areas of high segregation and poverty, low resource, or moderate resource. The analyses, such as Figure 7.3-5 RHNA Units and City Acreage Comparison by Non-White Population, should address RHNA units by income groups (lower, moderate, and above moderate). While the transit village areas will eventually provide better access to transit mobility options and represent an exciting transit-oriented development opportunity, the element should expand the analysis and list of sites to better formulate development opportunities, goals, actions, and metrics that will result in broader equitable quality of life throughout the community. In addition, the analysis of identified sites should address the significant lack of housing opportunities for lower-income households in the southern portion of the city that are proportionally whiter, more affluent, have significantly improved environmental quality of life, better performing schools, and score higher on the access to opportunity maps so to address fair housing issues and avoid an isolation of the RHNA.

Goals, Priorities, Metrics, and Milestones: The element must add or revise programs based on a complete analysis, listing, and prioritization of contributing factors to fair housing issues. Goals and actions must significantly seek to overcome contributing factors to fair housing issues and include metrics and milestones to target meaningful fair housing results. Currently, the element identifies programs to encourage and promote affordable housing; however, most of these programs do not appear to facilitate any meaningful change nor address AFFH requirements. Given that significant portions of the City are considered high-income/opportunity areas, and because Redlands is significantly whiter and wealthier than San Bernardino County, the element could focus on programs that enhance housing mobility and encourage development of more affordable housing choices in an inclusive manner throughout the community. Furthermore, the element must include programs with substantial place-based investments and protection against displacement in areas of high segregation and poverty. For more information, please see HCD's guidance at https://www.hcd.ca.gov/community-development/affh/index.shtm.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

   Extremely Low-Income (ELI) Households: While the element identifies the projected number of ELI households, it must still analyze their existing housing needs. This is particularly important given the unique and disproportionate needs of ELI households. For example, the element could analyze tenure, cost burden, overcrowding and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

   Housing Conditions: The element quantifies the age of the housing stock and includes some information on housing characteristics such as lacking plumbing or kitchen facilities. However, it must also estimate the number of units in need of rehabilitation and replacement. For example, the analysis could utilize information from the housing element update survey (Appendix C), estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable organizations. This information could be analyzed geographically as part of the assessment of fair housing. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Progress in Meeting the RHNA: The RHNA may be reduced by the number of new units built, permitted, approved or pending since July 1, 2021. The element lists (p. 57) 80 units affordable to lower-income households but it should also demonstrate affordability based on actual or anticipated sales price, rents or other mechanism ensuring affordability (e.g., deed-restrictions).

   Small Sites: For your information, sites below 0.5 acres are not deemed adequate to meet the lower-income RHNA absent analysis that development below 0.5 acres is appropriate to accommodate the lower-income housing need. Some of these small sites were utilized toward demonstrating adequate sites to accommodate the lower-income RHNA and should not be utilized for the purposes of meeting no net loss law pursuant to Government Code section 65863.

   Accessory Dwelling Units (ADU): The element assumes 15 ADUs per year for a potential buildout of 120 units within the planning period. According to HCD records, the City has permitted an average of 10 units per year, less than the 15 units assumed in the element. The trends noted in the element appear inconsistent with HCD records and, further, are lower than the assumption of 15 ADUs per year. To support assumptions for ADUs in the planning period, the element should either reconsider assumptions, reconcile trends with HCD records or include additional information such as more recent permitted units and inquiries, resources and incentives, other relevant factors and modify policies and programs as appropriate.

   Infrastructure: The element must demonstrate sufficient existing or planned water, sewer, and other dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the City regional housing need for the planning period. (Gov.

Code, § 65583.2, subd. (b).) Furthermore, the element should address which sites may lack access to infrastructure, as p. 65 of the element states that some sites do not have existing infrastructure service. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental.

Environmental Constraints: The element must describe environmental conditions within the city, relate those conditions to identified sites, and describe any other known environmental or other constraints that could impact housing development on identified sites in the planning period. This is particularly significant as it appears that the downtown and surrounding areas where a large share of development is planned, is subject to significant flood risk.

Electronic Sites Inventory Form: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Zoning for a Variety of Housing Types:

- *Emergency Shelters*: The element should clarify if there are any spacing requirements and provide greater detail regarding development standards and whether they pose a constraint to the development of emergency shelters.
- *Permanent Supportive Housing*: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate.
- *Employee Housing*: Health and Safety Code section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Health and Safety Code section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. The element must demonstrate zoning in compliance with these requirements or include programs as appropriate.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures… (Gov. Code, § 65583, subd. (a)(5).)*

Measure U: The element explains a few aspects of Measure U such as limits on density, heights, residential unit allocations and traffic levels of service. However, the element should include a complete analysis to better formulate a programmatic response to this severe constraint. For example, the element should discuss potential conflicts with state law, including housing element and state density bonus law. The element should also address the full range of options for exceeding limits in Measure U, timing and cost impacts of a 4/5th vote, including approval findings, any and all other limits on development and how the Measure relates particularly to rezoning sites and accommodating the RHNA. The analysis should address impact on housing cost, supply, fair housing choice throughout the city, affordability, timing and approval certainty. Based on the outcomes of this analysis, the element must revise programs.

Historic Preservation Measures: The element should provide greater detail and fully analyze the South Redlands Housing Conservation Overlay and the City Design and Preservation element processes mentioned on p. 93 as potential constraints to housing development for all income levels.

Processing and Permit Procedures: The element indicates that multifamily developments of 35 or more dwelling units are subject to a conditional use permit (CUP). The prior housing element had a program to address the CUP and 35-unit threshold as constraints. Instead, the City merely evaluated the requirement is not a constraint and appears to have eliminated the program. The element (p. 100) also concludes the requirement is not a constraint because multifamily has been approved recently and because the process is no different between rental and ownership development. However, recent multifamily approvals and treating developments the same are not necessarily indicators that these requirements are not constraints. A threshold of 35 units is a constraint and so is the potentially roving approval findings of "…the proposed development is appropriate at the proposed location." The element should include additional analysis of the threshold and approval findings for impacts on approval certainty, timing and cost and add or modify programs.

Building Codes and Their Enforcement: The element provides an overview of the building code, but it should also identify any local amendments to the building code and analyze impacts on the cost and supply of housing.

Streamlined Ministerial Approval Permit Procedures: The element should describe the City's SB 35 (Chapter 366, Statutes of 2017) streamlined ministerial approval procedure and application and include programs if appropriate.

Zoning, Development Standards, and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards, and fees on the City's website and include programs if appropriate.

Constraints on Housing for Persons with Disabilities:

- *Definition of Family*: The element should describe any zoning code definition of a family and analyze as a potential constraint on housing for persons with disabilities.
- *Group Homes with Six or Fewer Persons*: The element describes that group homes for six or fewer persons are permitted in all residential zones. However, these provisions appear to be limited to group homes licensed by the state. Yet, the state does not license all community care facilities or group homes serving six or fewer persons. The element should either clarify that group homes without licenses are also allowed in all residential zones or include a program to address this constraint on housing for persons with disabilities.
- *Group Homes for Seven or More Persons*: The element subjects group homes for seven or more persons to a CUP and limits them to multifamily and agricultural zones, unlike other similar uses. While the element includes Program 1.2-5 to implement mitigating strategies, the element should specifically analyze these constraints for impacts on housing supply and choices, approval certainty and objectivity for housing for persons with disabilities and modify Program 1.2-5 as appropriate such as committing to allow these uses in all zones that allow residential uses.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

   Developed Densities and Permit Times: The element must analyze requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis must address any hinderances on the construction of a locality's share of the regional housing need.

7. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

   The element includes some general quantification; however, the element should include analysis of households with special housing needs. The analysis should include, but is not limited to, factors such as trends, household income, tenure, housing types, zoning, and available resources. In addition:

   - *Homelessness*: The element includes three different numbers for the 2020

Point-in-Time Count on pp. 51, 100, and 111. The element should clarify which is the correct, most recent Point-in-Time count and use consistently throughout the element. The element must quantify the total number of persons experiencing homelessness and analyze their special housing needs.

- *Farmworkers*: The element indicates there are farmworkers employed in fulltime farming occupations in Redlands. In addition, farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. The element should acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

8. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

   The element states (p. 33) there may be additional projects, funded by the former Redlands Redevelopment Agency, at risk of conversion to market rate uses. If so, the element should identify these projects and include the required analysis. For additional information and sample analysis, see the *Building Blocks* at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml and for more information on identifying units at-risk, see the California Housing Partnership Corporation at http://www.chpc.net.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

   To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, objectives and specific and clear commitment to outcomes. Programs to be revised with discrete timelines (e.g., annually, Spring 2022) include, but are not limited to, Programs 1.1-7 (Development on Nonvacant Sites), 1.3-4 (Priority Water and Sewer Service), 1.3-6 (Outreach and Education), 1.5-10 (Non-profit Housing Development) and 1.6-1 (ADU Educational Campaign).

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to*

*accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

As noted in Finding B4, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- *Program 1.1-1 (RHNA Rezoning)*: The Program should commit to a minimum acreage to be rezoned and meet all requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) such as permitting multifamily uses without discretionary action and residential only and affordability requirements.
- *Program 1.1-2 (Transit Villages Specific Plan)*: The Program should commit to allowable densities, acreages, anticipated units and to meet by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) to the extent necessary.
- *Program 1.3-1 (Surplus Lands)*: The Program could consider a schedule of actions including commitment to facilitate development such as zoning, incentives and expediting permit procedures.

3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

   The element must include a program(s) to assist in the development of housing affordable to lower-income households, including ELI and special needs households. This is particularly important given that the City only developed 1 very low-income unit during the 5th cycle planning period. Program actions could include prioritizing some funding for housing developments affordable to ELI households or households with special needs, offering financial incentives or regulatory concessions, expediting or streamlining permit procedures, reducing fees and leasing land.
   For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

In addition, the element, including public comments, note several constraints that warrant programs. For example, the element concludes Measure U is a constraint as well as minimum lot sizes (p. 95). The City also received comments to establish quarterly meetings with builders (p. C-17). The element should include programs to address these issues. In addition, while Program 1.2-8 (Socio Economic Cost Benefit Studies) commits to objective standards, it should consider additional measures like removing the requirement or pursue a more comprehensive City initiated study and should include a mid-term evaluation of effectiveness with commitment to alternative actions within a certain time.

2022 Local Voter Initiative: HCD understands the Town Village Specific Plan is subject to a local voter initiative that, if approved, would essentially remove the City's strategy to accommodate the RHNA, including by income group. As a result, the element must include program actions with timelines related to the initiative including a commitment to immediately remedy any impacts on the City's adequate sites strategy or HCD may revoke housing element compliance pursuant to Government Code section 65585, subdivision (i).

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs to have specific commitment, milestones, and metrics to overcome fair housing issues and to enhance housing mobility strategies, encourage development of new affordable housing in high resource areas, improve place-based strategies, and protect residents from displacement.

6. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

   The element identifies housing units at-risk of converting to market-rate and includes Program 1.4-1 to monitor the units to ensure tenants receive proper notifications. However, Program 1.4-1 must also commit to proactively coordinate with qualified entities, assist with funding or support funding applications and educate, support and assist tenants.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved... (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives estimating the number of housing units by income category that can be constructed, rehabilitated, and conserved in the planning period. This requirement could be addressed by utilizing a matrix like the one illustrated below:

Income	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low-			
Very Low-			
Low-			
Moderate-			
Above Moderate-			
TOTAL			

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

While Appendix C summarizes many of the public comments and describes how they were considered and incorporated into the element, HCD urges the City to re-evaluate comments related to Measure U and other land use constraints, community opposition to denser housing types, and the appropriateness of some identified sites.

In addition, the element does not clarify whether a full draft element was available to the public before its submittal to HCD. On the call, City staff indicated it may have only been available for one week prior to submittal to HCD. By not providing adequate time for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment at least three to four weeks prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

ENVIRONMENTAL IMPACT REPORT ADDENDUM

2021 - 2029 Housing Element Update

Lead Agency:

CITY OF REDLANDS
DEVELOPMENT SERVICES DEPARTMENT
35 Cajon Street, Suite 20
Redlands, CA 92373
Contact: Catherine Lin, AICP
909.798.7555 x 2

Prepared by:

MICHAEL BAKER INTERNATIONAL
3536 Concours St #100
Ontario, CA 91764
Contact: Emily Elliott, AICP
909.974.4961

December 2021

JN 179836

This document is designed for double-sided printing to conserve natural resources.

TABLE OF CONTENTS

Contents

TABLE OF CONTENTS ..... **I**

1.0 INTRODUCTION **2**

1.1 PURPOSE OF AN ADDENDUM 2
1.2 DOCUMENTS INCORPORATED BY REFERENCE 3
1.3 PROJECT DESCRIPTION 4
1.4 DISCRETIONARY ACTIONS 6

2.0 ENVIRONMENTAL CHECKLIST **7**

2.1 BACKGROUND 7

3.0 ENVIRONMENTAL ANALYSIS **9**

3.1 AESTHETICS 10
3.2 AGRICULTURE AND FORESTRY RESOURCES 12
3.3 AIR QUALITY 15
3.4 BIOLOGICAL RESOURCES 18
3.5 CULTURAL RESOURCES 22
3.6 ENERGY 25
3.7 GEOLOGY AND SOILS 26
3.8 GREENHOUSE GAS EMISSIONS 32
3.9 HAZARDS AND HAZARDOUS MATERIALS 34
3.10 HYDROLOGY AND WATER QUALITY 39
3.11 LAND USE AND PLANNING 44
3.12 MINERAL RESOURCES 45
3.13 NOISE 46
3.14 POPULATION AND HOUSING 49
3.15 PUBLIC SERVICES 50
3.16 RECREATION 54
3.17 TRANSPORTATION 55
3.18 TRIBAL CULTURAL RESOURCES 58
3.19 UTILITIES AND SERVICE SYSTEMS 59
3.20 WILDFIRE 63
3.21 MANDATORY FINDINGS OF SIGNIFICANCE 64

4.0 REFERENCES **66**

APPENDICES:

Appendix A 2035 General Plan EIR

1.0 INTRODUCTION

An addendum to the Environmental Impact Report for the City of Redlands General Plan Update and Climate Action Plan (General Plan EIR) (State Clearinghouse No. 2016081041) has been prepared in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.), the CEQA Guidelines (Cal. Code Regs., Title 14, Chapter 3, Section 15000 et seq.) and City of Redlands CEQA Guidelines to address minor changes to the City of Redlands General Plan for the City of Redlands 2021-2029 Housing Element Update (Housing Element or "project"). The Housing Element will necessitate future amendments to other elements of the General Plan, in particular, the Land Use Element, and the Safety Element. However, amendments to these elements are not included as part of the scope of this project and future amendments will be reviewed by City Staff to verify consistency with the Housing Element.

State law (California Government Code Sections 65580–65589.8) requires that jurisdictions evaluate their housing elements every eight years. The current statutory update in the Southern California Association of Governments (SCAG) region covers the planning period 2021 through 2029 (6th cycle). The proposed 6th Cycle Housing Element represents a comprehensive update of the adopted 2013-2021 Housing Element (5th Cycle), in order to comply with State housing law and reflect the current 6th Cycle Regional Housing Needs Assessment (RHNA) Final Allocation Plan.

In general, the 6th Cycle Housing Element identifies and establishes the City's policies with respect to meeting the housing needs of existing and future residents in Redlands. It establishes housing policies that will guide City decision-making and sets forth an action plan to implement the City's housing goals over the next eight years. The commitments are in furtherance of the statewide housing goal of "early attainment of decent housing and a suitable living environment for every California family," as well as a reflection of the concerns unique to the City of Redlands.

1.1 PURPOSE OF AN ADDENDUM

CEQA, a Statewide environmental law contained in Public Resource Code (PRC) Sections 21000–21177, applies to most public agency decisions which carry out, authorize, or approve actions that have the potential to adversely affect the environment. The CEQA Guidelines allow for updating and using a previously certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new significant environmental impacts, an addendum to a previously certified EIR may be prepared, consistent with CEQA Guidelines Section 15164. This Addendum has been prepared in accordance with Section 21166 of CEQA and Sections 15162 and 15164 of the CEQA Guidelines.

Section 15164(a) of the CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the CEQA Guidelines, a Subsequent EIR or Negative Declaration is only required when:

1. *Substantial changes are proposed in the project which will require major revision of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revision of the previous EIR due to the involvement of new significant environmental increase in the severity of previously identified significant effects; or*

3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:*

    (a) *The project will have one or more significant effects not discussed in the previous EIR;*

    (b) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

    (c) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

    (d) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (CEQA Guidelines Section 15162[a])*

The following describes the requirements of an Addendum, as defined by CEQA Guidelines Section 15164:

1. *The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

2. *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*

3. *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

4. *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*

5. *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an Addendum may be prepared, consistent with CEQA Guidelines Section 15164. The City of Redlands certified its 2035 General Plan EIR in December 2017, approximately three years after the City adopted the 5th Cycle Housing Element and certified its corresponding Initial Study/Negative Declaration (IS/ND). Thus, although the 5th Cycle Housing Element was not expressly included within the scope of the 2035 General Plan and its corresponding EIR, the land use assumptions and policies of the 5th Cycle Housing Element were considered as an existing condition at the time of its preparation. For this reason, this Addendum relies on the 2035 General Plan EIR and the related administrative record and is intended to be included or attached to the 2035 General Plan EIR. It is not to be considered an independent or separate document from the 2035 General Plan EIR.

1.2 DOCUMENTS INCORPORATED BY REFERENCE

The following documents were utilized during preparation of this Addendum and are incorporated into this document by reference. The documents are available for review at the City of Redlands Development Services Department, 35 Cajon Street, Suite 20, Redlands, CA 92373.

- *City of Redlands 2035 General Plan*. The City of Redlands 2035 General Plan (2035 General Plan) was adopted in December 2017. The 2035 General Plan is organized around seven Themes (or chapters), which include policies and actions to guide future development. The seven Themes in the 2035 General Plan are: 1. Distinctive City, 2. Prosperous Economy, 3. Livable Community, 4. Connected City, 5. Vital Environment, 6. Healthy Community, 7. Sustainable Community. The State-mandated elements of Land Use, Circulation, Open Space, Conservation, Health & Safety, Noise, and Housing are all integrated within the Themes noted above.
- *City of Redlands 2035 General Plan Environmental Impact Report*. Pursuant to CEQA and the CEQA Guidelines, the City of Redlands prepared an EIR to analyze the impacts of 2035 General Plan buildout. According to the 2035 General Plan EIR, significant and unavoidable impacts were identified for agricultural resources, air quality, and transportation. The 2035 General Plan EIR was certified in December 2017.

- *City of Redlands General Plan Housing Element Update (General Plan Amendment No. 130) Initial Study & Negative Declaration*. Pursuant to CEQA and the CEQA Guidelines, the City of Redlands prepared an Initial Study/Negative Declaration (IS/ND) to analyze the impacts of implementing the 5th Cycle Housing Element for the 2013-2021 planning period.

- *City Code of the City of Redlands*. The City's Land Use Zoning Ordinance is found in the City Code of the City of Redlands (City Code) Title 18, Zoning Regulations, which carries out the City's General Plan policies by regulating development and land uses within Redlands. City Code Chapter 18.16, Districts and Zoning Map, describes and provides development standards for the City's 32 land use districts and three (3) overlay districts.

1.3 PROJECT DESCRIPTION

The 6th Cycle Housing Element (referred to as the "project") retains many of the goals, policies, and relevant implementation programs previously included as part of the 5th Cycle Housing Element. The project consists of updates to the Housing Element, particularly limited to the Housing Needs Assessment, which contains updated statistics and analyses based on data from the 2010 US Census and the 2019 American Community Survey and a revised sites inventory to meet the City's RHNA. All other updates are limited to background information updates and policy updates in accordance with State law and internal consistency. A summary of the revisions proposed by the project is included below.

HOUSING ELEMENT UPDATE OVERVIEW

The proposed 6th Cycle Housing Element Update represents a comprehensive update to the adopted 5th Cycle Housing Element. The update is proposed to comply with State housing law and reflect the current 6th Cycle RHNA Final Allocation Plan. The Housing Element, which is one of the City's General Plan Elements, consists of seven key chapters:

- Chapter 1, *Introduction*, provides information on the purpose and scope of the Housing Element, the State of California's requirements, the Housing Element's relationship to other General Plan elements, a discussion on public outreach, and organization of the document.

- Chapter 2, *Housing Needs Assessment, Regional Housing Needs Assessment and Special Needs*, describes Redlands' demographic and employment trends, characteristics of the City's current housing stock, housing affordability, and energy conservation opportunities. The Regional Housing Needs Assessment and Special Needs section explains Redlands' allocation of the regional housing need, projects housing needs, and describes the characteristics and needs of various special populations, including the elderly, people with disabilities, homeless, and single parents

- Chapter 3, *Housing Resources and Sites Inventory*, identifies specific sites suitable for residential development to allow for a comparison of the RHNA with realistic development capacity. Environmental and infrastructure constraints on potential housing sites are also described.

- Chapter 4, *Constraints*, identifies and analyzes potential and actual constraints to housing development in Redlands, both related to governmental actions (e.g., regulatory standards) and non-governmental conditions (e.g., the housing market or construction costs).

- Chapter 5, *Quantified Objectives, Housing Goals, Policies, and Programs*, includes the goals, objectives, policies, and programs for this Housing Element planning period.

- Chapter 6, *Review of Past Accomplishments*, describes the City's accomplishments and provides an assessment of the effectiveness of the programs in the prior 5th Cycle Housing Element.

- Chapter 7, *Affirmatively Furthering Fair Housing*, includes an analysis of Fair Housing, contributing factors to housing problems, and action items to address them.

Appendices cover the topics of community engagement, sites inventory map, and sites inventory data.

CITY OF REDLANDS HOUSING NEEDS

The City's RHNA for the 2021-2029 planning period reflects the California Department of Housing and Community Development's (HCD) determination of the housing needs in a region, broken down by income level. Redlands' RHNA is 3,516 housing units. As part of the 2021-2029 Housing Element update, the City has identified land available for residential development under existing and future zoning to fulfill its RHNA. The City will rezone land to provide for up to 4,219 units (RHNA + 20% buffer) within three years from the date of adoption. The proposed inventory draft, included as Appendix A and Appendix B of the Housing Element, includes additional capacity beyond what is necessary to meet the RHNA + 20% buffer. Some of the rezone candidate sites identified in the RHNA may not be rezoned, or will be zoned differently than illustrated in the sites inventory based on the results of additional public engagement and environmental review. Regardless of any final decisions on the specific sites to rezone, Redlands will have adequate capacity to meet the RHNA for all income levels after rezoning within three years of Housing Element adoption.

Although the proposed housing inventory sites are described and incorporated in the 2035 General Plan, approximately 119 acres of the project's housing inventory sites are not presently designated for housing and would require a future amendment to the 2035 General Plan Land Use Map. In addition, the 6th Cycle Housing Element will necessitate future amendments to the General Plan Land Use Element and Safety Element. As discussed, amendments to these elements are not included as part of the scope of this project and future amendments will be reviewed by City Staff to verify consistency with the Housing Element and determine further environmental review requirements.

1.4 DISCRETIONARY ACTIONS

The City of Redlands is the Lead Agency under CEQA and has discretionary authority over the project. The project would be subject to various City permits and approvals, including, but not limited to:

- California Environmental Quality Act review;
- Adoption of the 2021-2029 Housing Element;

2.0 ENVIRONMENTAL CHECKLIST

2.1 BACKGROUND

1.	**Project Title:** 2021-2029 Housing Element Update
2.	**Lead Agency Name and Address:** City of Redlands Development Services Department 35 Cajon Street, Suite 20 Redlands, CA 92373
3.	**Contact Person and Phone Number:** Catherine Lin, AICP, Principal Planner 909.798.7555 x 2
4.	**Project Location:** Redlands is located at the base of the San Bernardino Mountains in San Bernardino County, 60 miles northeast of Los Angeles and 45 miles west of Palm Springs.
5.	**Project Sponsor's Name and Address:** City of Redlands Development Services Department 35 Cajon Street, Suite 20 Redlands, CA 92373
6.	**General Plan Designation:** Various
7.	**Zoning:** Various
8.	**Description of the Project:** Refer to Section 1.3, *Project Description*.
9.	**Surrounding Land Uses and Setting:** Various
10.	**Other public agencies whose approval is required (e.g., permits, financing approval or participation agreement).** None applicable.

This page intentionally left blank.

3.0 ENVIRONMENTAL ANALYSIS

This section describes the environmental impacts of the project as compared to those identified in the 2035 General Plan EIR and discusses any substantial changes to existing conditions or regulatory setting since the 2035 General Plan EIR was certified. The issue areas evaluated in this document include the following, pursuant to Appendix G of the CEQA Guidelines, and have been modified to evaluate the project changes for which an EIR has been previously certified to assist in the determination of the need for a supplemental EIR or an Addendum.

In December 2018, the Natural Resources Agency amended the CEQA Guidelines, which included modifications to Appendix G, *Environmental Checklist Form*. As such, the following analysis identifies where modifications to the Appendix G topical areas and thresholds have been added and/or updated since the 2035 General Plan EIR was prepared.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

A summary of impacts of the adopted Specific Plan and the mitigation measures imposed is provided along with an analysis of the potential impacts resulting from the project and whether those impacts substantially exceed those discussed in the certified 2035 General Plan EIR.

3.1 AESTHETICS

This section corresponds with 2035 General Plan EIR Section 3.1, *Aesthetics.*

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

As detailed in the 2035 General Plan EIR, scenic vistas in the City of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Scenic views are also found in the urbanized part of the city, including along scenic and historic drives. The General Plan would continue to regulate development in these areas and contains policies to ensure that opportunities to enjoy scenic views are either preserved or enhanced. Thus, substantial adverse effects are not expected to occur.
The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. These projects would be regulated by existing General Plan policies to ensure that opportunities to enjoy scenic views are preserved or enhanced. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning scenic vistas as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

As detailed in 2035 General Plan EIR, policies under the existing General Plan ensure that Redlands maintains special design standards for designated scenic drives that are sensitive to the streets' scenic qualities. These policies designate additional scenic streets with special design standards and encourage streetscape design that is cognizant of viewpoints and vistas. Specific developments would be required to follow these design standards. Individual development projects will still be subject to development and planning review and must therefore conform to zoning and other ordinances regarding aesthetic qualities such as lighting, signage, landscaping, and building setbacks.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose

rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning State Scenic Highways as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

As detailed in the 2035 General Plan EIR, the General Plan does not call for any substantial changes to land use or building design for most neighborhoods within the planning area and includes provisions to preserve or improve the existing visual character of the city. Proposed rezoning's and policies would direct new development into underutilized or previously developed areas, where any proposed changes in land use and physical design are intended to increase visual quality.

In addition, proposed policies seek to ensure that any development or redevelopment is visibly compatible with the surrounding environment. Policies regarding visual compatibility in the General Plan pertain to scale, historic preservation, landscaping, and preservation of scenic views and vistas. Policies pertaining to areas of new development promote visually appealing streetscapes and public art to improve the visual character of the Planning Area. The General Plan has policies intended to preserve the existing historic character of Redlands. These policies aim to aid property owners to preserve historic structures, strengthen the influence of the Historic and Scenic Preservation Commission, and encourage streetscape and building design that compliments the historic character of the community. The open space and canyon components of the Planning Area's visual character would not be significantly altered by the Project. The General Plan contains policies to preserve hillsides and ridges, open space, and natural scenery.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning the visual character or quality of public views as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

As detailed in the 2035 General Plan EIR, new development resulting from implementation of the General Plan would necessitate the use of additional light fixtures and would contribute to existing conditions of light and glare. New light sources may include residential and non-residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas. Most new development resulting from the General Plan would take place in or near developed and urbanized areas, where moderate light and glare already exist, and would not be out of character with the urban environment.

The General Plan includes policies related to buffering between development and sensitive habitats, and between commercial, residential, and industrial uses. The General Plan also includes a policy to preserve the visual character of the canyon areas and the agricultural area of Crafton by exploring the adoption of a dark sky ordinance. With these measures in place, this impact was determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning day or nighttime views as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.2 AGRICULTURE AND FORESTRY RESOURCES

This section corresponds with 2035 General Plan EIR Section 3.2, *Agricultural Resources*.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

According to the 2035 General Plan EIR, proposed land use changes could impact areas designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (important farmland) designated by the currently under cultivation throughout the City. This includes the East Valley Corridor, where some farmland has been converted to commercial and industrial land uses since the adoption of the 1995 General Plan and is proposed to be rezoned pursuant to the project. While existing General Plan policies provide a framework to permit existing agricultural uses and ensure that important farmland remains as farming or other related agricultural support uses, the conversion of this farmland was determined to be a significant and unavoidable impact.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning farmland as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: The 2035 General Plan EIR determined that no mitigation is available that would reduce impacts to a level that is less than significant.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Significant and Unavoidable.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

According to the 2035 General Plan EIR, Williamson Act contracts are spread throughout the periphery of the City. Most contracted land is located in Crafton, but there are also contracted lands in the San Timoteo Canyon and in the north of the city near the Santa Ana River Wash. Most of the land contracted under the Williamson Act would not be susceptible to buildout pressure due to their categorization as low-density Rural Living and Agriculture land uses under the General Plan. Some contracted land is located on sites designated as Very Low Density Residential, which allows for the continuation of agricultural uses. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning existing zoning for agricultural use as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less than Significant Impact

c) Conflict with existing zoning for, or cause rezoning, of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The City does not contain any forest land. Furthermore, no portion of the City zoned for forestland. Therefore, the project would not result in the loss of forestland or the conversion of forestland to non-forest use. Therefore, development of the project would not result in greater impacts than previously analyzed in the 2035 General Plan EIR. No impact would occur.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Refer to Response 3.2(c).

Certified General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

As discussed in response 3.2(a), implementation of the Housing Element would not result in greater impacts than previously analyzed in the 2035 General Plan EIR. The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning the farmland and forestland as compared to the 2035 General Plan EIR.

Certified General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less than Significant Impact.

3.3 AIR QUALITY

This section corresponds with 2035 General Plan EIR Section 3.3, *Air Quality.*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Based on the 2035 General Plan EIR, the buildout of the General Plan would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment to the ambient air quality standards or emission reductions in the Air Quality Management Plan. In addition, the General Plan EIR determined that the buildout of the General Plan would not exceed the assumptions of the Air Quality Management Plan. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning conflicting with an applicable air quality plan.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less than Significant Impact

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Based on the 2035 General Plan EIR, the cumulative impacts that were analyzed from the General Plan must evaluate the project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). If the General Plan does not exceed thresholds and is determined to have less-than-significant impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the General Plan, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, the General Plan would only be considered to have a significant cumulative impact if its contribution accounts for a

significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

The South Coast Air Basin (SCAB) has been designated as a Federal nonattainment area for O_3 and $PM_{2.5}$, and a State nonattainment area for O_3, PM_{10}, $PM_{2.5}$, and NO_2. PM_{10} and $PM_{2.5}$ emissions associated with construction generally result in localized impacts. Future development projects allowed under the 2035 General Plan and associated land uses would generate vehicle trips and vehicle miles travelled (VMT) that would result in ozone precursor emissions and particulate matter. However, individual projects proposed under the General Plan would be required to undergo subsequent environmental review pursuant to CEQA, and as part of this review effort, projects requiring discretionary approval would be required to assess whether the project complies with the applicable air quality plan. Additionally, SCAQMD would require that individual projects demonstrate compliance with SCAQMD rules and regulations governing air quality, specifically particulate matter. The City of Redlands would continue to coordinate with SCAQMD to ensure citywide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the General Plan would result in a cumulatively considerable impact.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning net increase of pollutants as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No mitigation is available beyond measures identified in the AQMP, SIP, CARB motor vehicle standards, SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and principles and actions in the proposed General Plan that would partially reduce impacts. Therefore, impacts would remain significant and unavoidable.

Level of Significance: Significant and Unavoidable.

c) Expose sensitive receptors to substantial pollutant concentrations?

According to the 2035 General Plan, buildout of the General Plan could allow residential and other sensitive land uses to locate in the vicinity of air pollutant sources such as stationary sources and the freeways. Policies in the General Plan would serve to protect new sensitive receptors from exposure to substantial pollutant concentrations. Proposed policies would require applicants for sensitive land uses to minimize the potential for air pollution exposure through siting and design. Proposed policies also would require the development of requirements for retrofitting existing residential buildings within a 500-foot buffer along the freeway to abate air pollution, and limit new residential developments within the buffer. The SCAQMD permitting process for new emissions sources and existing sources in the vicinity of new sensitive developments would further help to ensure that substantial exposure to air pollutants would be avoided. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose

rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning sensitive receptors in relation to substantial pollutant concentrations as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No required.

Level of Significance: Less Than Significant Impact.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

Based on the 2035 General Plan EIR, odors would be generated from vehicles and/or equipment exhaust emissions during construction of future projects under the General Plan. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Development under the General Plan is required to meet all local, State, and Federal regulations related to odor control, including permit requirements. However, new sensitive receptors would be potentially located near odor-generating land uses. Future project-level analysis will demonstrate consistency with the General Plan, principles and actions would ensure that odor impacts would be reduced to a level that is less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning emissions compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: None required.

Level of Significance: Less Than Significant Impact.

3.4 BIOLOGICAL RESOURCES

This section corresponds with 2035 General Plan EIR Section 3.4, *Biological Resources.*

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

As stated in 2035 General Plan EIR, there are 19 species that are State or federally listed as rare, threatened, or endangered species that have been or were identified as potentially present within the Planning Area. The following eight species are known to either be present or have a moderate to high probability of occurring due to the presence of suitable habitat, mainly along the Santa Ana River, Mill Creek, and San Timoteo Creek:

- Nevin's barberry;
- Slender-horned spineflower;
- Santa Ana River woolly star;
- Southwestern willow flycatcher;
- California gnatcatcher;
- Least Bell's vireo;
- San Bernardino kangaroo rat; and
- Stephens' kangaroo rat.

According to the 2035 General Plan EIR, direct impacts on special-status species could result from the conversion of habitat either temporarily, as a result of grading, excavation, and construction activities, or permanently from the ongoing operation and/or maintenance of a project or plan. Indirect impacts could result from elevated dust or noise levels or increased sediment loads in runoff from construction activities. Indirect impacts could also result from permanent alterations to hydrology upstream of habitats supporting sensitive species, including increased runoff, sedimentation, or pollutant loads, and increased human activity. Most new development expected to occur within the timeframe of the General Plan would be within existing developed areas, rather than along the Santa Ana River, Mill Creek, and San Timoteo Creek where critical habitat has been identified. In addition to these critical habitat areas, vacant and underutilized parcels in the Planning Area may be providing habitat for a variety of species. Infill development and redevelopment under the General Plan could affect habitat and species on these parcels.

The 2035 General Plan EIR concluded that principles and actions in the General Plan, the City's development review process, and regulatory permitting required by existing Federal and State laws relative to listed species would reduce potential impacts on federally or State-listed species and special status species to less than significant levels. For instance, Action 6-A.11 would require a biological survey for individual projects that would identify specific impacts to critical habitat and restrict development accordingly, and Action 6-A.12 would require the same for projects adjacent to wetlands, riparian corridors, or wildlife corridors. Other proposed policies would require the City to protect wildlife habitat and wildlife corridors, limit grading and ground-disturbing activities, and support conservation and restoration of natural habitats. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose

rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning habitat modifications as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: None required.

Level of Significance: Less Than Significant Impact.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

As stated in the 2035 General Plan EIR, future development or public works activities in the city may result in significant impacts on riparian vegetation or other sensitive natural communities, especially on land with native vegetation adjacent to or immediately upstream of the Santa Ana River, Mill Creek, and San Timoteo Creek. However, most riparian areas are designated Open Space under the General Plan and would thus be protected from direct impacts from development. Furthermore, principles and actions in the General Plan would serve to reduce any potential impacts. General Plan Principle 6-P.7 would require the City to protect environmentally sensitive lands, and Principle 6-P.9 would require the City to protect wildlife corridors, including natural watercourses. Action 6-A.12 would require the City to review all future private development and public works activities on sites that contain or are adjacent to riparian resources to determine an appropriate buffer between developed uses and drainages, and Action 6- A.15 would require the City to enhance riparian corridors. Action 6-A.35 would promote the protection and restoration of waterways and riparian areas. In addition, projects that involve removal of riparian vegetation would have to comply with established regulatory permitting through the appropriate federal and/or State agency, consistent with current Federal and State laws. The General Plan principles and actions discussed above, the City's development review process, and regulatory permitting required by existing Federal and State laws relative to riparian habitat or other sensitive natural communities would reduce potential impacts of the project to less than significant levels.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning any riparian habitat or other sensitive natural community as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required for the 2035 General Plan EIR.

Mitigation Measures: None required.

Level of Significance: Less Than Significant Impact.

c) Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As stated in 2035 General Plan EIR, several of the natural watercourses would likely be considered under the Federal jurisdiction of the USACE as waters of the U.S. and thus subject to the Federal Clean Water Act. Smaller drainages, particularly in the hilly areas in the southern and eastern portions of the Planning Area, may be considered jurisdictional by the USACE. The Zanja and Morey Arroyo are artificial ditches but may also be subject to regulation by the USACE. It is possible that one or more of these drainages may contain wetland features, either now or in the future, depending on annual rainfall, but there is little or no potential for marshes, vernal pools, or other specific types of wetlands to occur within the city.

The 2035 General Plan EIR determined that General Plan Action 6-A.12 would reduce potential impacts by requiring the City to review all future private development and public works activities on sites that contain or adjacent to wetlands to determine an appropriate buffer from developed uses. Projects that involve impacts on drainages with wetland features would have to comply with established regulatory permitting through the appropriate Federal and/or State agency, consistent with current Federal and State laws. Implementation of the indicated General Plan policies, and the City's development review process, and regulatory permitting required by existing Federal and State laws relative to jurisdictional features, were determined to reduce potential impacts of the General Plan on federally protected wetlands to less than significant levels.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning State or Federally protected wetlands as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: None required.

Level of Significance: Less Than Significant Impact.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

As stated in the 2035 General Plan EIR, the many drainages, canyons, and extensive hillsides with native vegetation can provide corridors or areas for travel for local wildlife, especially where such drainages or areas connect to larger areas of undisturbed native vegetation, all of which can provide a variety of resources and protection for native wildlife. Future development within the Planning Area could sever or restrict connectivity or the usefulness of such wildlife corridors if human activities or improvements can encroach into such corridor areas; however, principles and actions in the General Plan would reduce the potential impact on wildlife corridors. Principle 4-A.67 would require the City to create wildlife corridors extending

throughout the Live Oak Canyon and San Timoteo Canyon areas. Principles 6-P.7, 6-P.8, and 6-P.9 would require the City to protect wildlife habitat, including wildlife corridors connecting the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas. Action 6-A.14 would reduce impacts from transportation projects on wildlife corridors; Action 6-A.12 would require projects adjacent to wildlife corridors to be specifically analyzed; and Action 6-A.15 would require the City to enhance riparian corridors.

According to the 2035 General Plan EIR, specific developments that involve impacts on drainages or corridors of native vegetation would have to comply with established regulatory permitting through the appropriate Federal and/or State agency, consistent with current Federal and State laws. Implementation of the indicated General Plan policies and the City's development review process, and possible regulatory permitting required by existing federal and State laws relative to listed species that utilize wildlife corridors, would reduce potential impacts of the project to less than significant levels. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning wildlife movement as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: None required.

Level of Significance: Less Than Significant Impact.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As stated in 2035 General Plan EIR, the General Plan establishes the over-arching policies and direction for the City relative to development review and protection of biological resources, so the General Plan would not conflict with local ordinances or policies which are intended to implement and be consistent with the goals of the General Plan. The General Plan's policies to promote the health and maintenance of street trees is consistent with Municipal Code Chapter 12.52. Proposed policies are also consistent with the Street Tree Policy and Protection Guidelines Manual adopted in accordance with the Municipal Code, though these guidelines may be updated to better implement General Plan policies to care for street trees and trees in public places. The principles and actions of the General Plan would help to lay the groundwork for any future ordinances or programs to protect trees and other biological resources.

The 2035 General Plan EIR also concluded that implementation of the General Plan would also be consistent with the Upper Santa Ana Wash Land Management and Habitat Conservation Plan (Wash Plan) and the San Bernardino County General Plan. Policies in the General Plan maintain consistency with the Wash Plan by deferring to the Wash Plan's resource management standards. Similarly, the General Plan seeks to maintain consistency with the policies of the San Bernardino County General Plan, particularly regarding the protection of open space and natural resources including critical habitat and habitat for sensitive plant or animal species. Any future specific ordinances or programs to protect biological resources

would have to be consistent with the goals of the General Plan. Therefore, there would be no inconsistencies and no impacts in this regard, and no need for mitigation.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning local polices or ordinances protecting biological resources as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: None required.

Level of Significance: Less than Significant Impact.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

As stated in the 2035 General Plan EIR, at present, there are no adopted regional habitat conservation plans or natural community conservation plans. However, the City is participating in the proposed Wash Plan, which has a habitat conservation plan component. Policies in the General Plan emphasize consistency with the Wash Plan's habitat conservation policies. Therefore, implementation of the General Plan would have a less than significant impact.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning an adopted Habitat Conservation Plan or Natural Community Conservation Plan as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.5 CULTURAL RESOURCES

This section corresponds with 2035 General Plan EIR Section 3.8, *Historical, Archaeological, and Paleontological Resources.*

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5?

Based on the 2035 General Plan EIR, implementation of the General Plan would not directly result in the destruction of, or damage to, historical resources. However, future development and redevelopment permitted under the General Plan could result in changes that affect historic resources. Changes could include demolition, seismic retrofitting, and accidents caused by nearby construction. The impact of such activities would be considered significant if they were to cause a substantial adverse change to the historical resources as defined by CEQA Guidelines Section 15064.5.

The 2035 General Plan EIR determined that impacts to historic resources would be reduced through implementation of the CEQA Guidelines. The CEQA Guidelines require a project that will have potentially adverse impacts on historical resources to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties. In addition, the Redlands Historic and Scenic Preservation Ordinance offers additional protections to historic resources by giving the City the authority to make recommendations, decisions, and determinations regarding the designation, preservation, protection, and enhancement of historic resources, including the authority to deny demolition, except in cases of proven hardship. Finally, the General Plan includes goals and policies that would minimize or avoid impacts on historical resources by requiring the protection and preservation of such resources. Proposed policies seek to recognize historic resources within the Planning Area in a manner that fosters the preservation of historic character in the area's structures and neighborhoods. Proposed policies also establish development procedures and incentives that promote historic preservation. Impacts to historic resources were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning historical resources as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Based on the 2035 General Plan EIR, the records search conducted for the General Plan update indicated the presence of 11 prehistoric resources within one mile of the Planning Area. The prehistoric resources

include habitation areas, artifact scatters, bedrock milling sites, and isolated artifacts. As the records search area has not been 100 percent studied and there are areas within the Planning Area that have never been examined or researched, there is potential for new archaeological resources to be discovered in the future. Future development projects or public works activities allowed under the General Plan may involve grading, excavation, overland vehicle travel, or other ground-disturbing activities, or could facilitate public access to archaeological sites, which could disturb or damage unknown archaeological resources. The impact of such activities would be considered significant if they were to cause a substantial adverse change to the archaeological resources as defined by CEQA Guidelines Section 15064.5.

According to the 2035 General Plan EIR, although General Plan buildout may result in actions that could adversely affect archaeological resources, policies in the General Plan would minimize or avoid impacts by requiring the protection and preservation of such resources. In accordance with Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f), which recognize that historical or unique archaeological resources may be accidentally discovered during project construction, General Plan Action 2-A.74 would require that areas identified to contain historical or unique archaeological resources be evaluated of by a qualified archaeologist for implementation of avoidance or appropriate mitigation measures, pursuant to CEQA Guidelines Section 15064.5(f). Additional proposed policies would serve to ensure the availability of information regarding archaeological resources in the Planning Area in order to allow the avoidance of negative impacts on known resources, as well to ensure the development of appropriate mitigation and monitoring procedures for projects on sensitive sites. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning an archaeological resource pursuant to Section 15064.5 as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Based on the 2035 General Plan EIR, Human remains, particularly those interred outside formal cemeteries, could be disturbed during grading, excavation, or other ground-disturbing activities associated with future development or redevelopment projects allowed under the General Plan. The treatment of Native American human remains is regulated by Public Resources Code Section 5097.98, as amended by Assembly Bill 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes. Future private development and public works activities are required to comply with existing State law.

Although the General Plan does not include any goals or policies that directly address the disturbance of human remains, future development and redevelopment projects allowed under the General Plan would be

required to adhere to the laws and regulations discussed above. Therefore, impacts associated with the disturbance of human remains would be less than significant because existing laws and regulations would reduce the potential for encountering human remains and ensure the appropriate disposition of any human remains that are encountered.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning human remains, including those interred outside of formal cemeteries as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.6 ENERGY

This section corresponds with 2035 General Plan EIR Section 3.5, *Energy, Greenhouse Gases, and Climate Change.*

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Based on the 2035 General Plan EIR, development under the General Plan would increase future energy consumption within the plan area, resulting in additional demand for electricity and natural gas supply and services. Future development projects and land uses proposed under the General Plan would increase the population and employment in the city, and associated energy demand above existing conditions. However, despite the overall increase in future energy use, the state's current and future energy code and the General Plan policies would ensure energy efficient designs in new development and encourage energy efficiency upgrades in existing development, both of which would minimize wasteful, inefficient energy consumption. The General Plan policies also require energy conservation. Future development would be required to comply with Title 24 energy performance standards and the General Plan energy conservation policies and actions. With implementation of the General Plan and the proposed CAP, impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City

review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Based on the 2035 General Plan EIR, all future development under the General Plan would be required to comply with the latest California Building Standards Code requirements, including Energy Efficiency Standards, as well as all Federal, State, and local rules and regulations pertaining to energy consumption and conservation. The General Plan includes policies that emphasize energy reduction strategies. The proposed Climate Action Plan (CAP) includes an inventory of citywide GHG emissions, forecasts of future citywide GHG emissions, monitoring and reporting processes to ensure State GHG targets are met, and options for reducing GHG emissions beyond State requirements. The proposed CAP is written for intended implementation through the year 2035. Through implementation of City policies as delineated in the General Plan, the General Plan would support the CARB passenger vehicle GHG emissions reduction targets through measures that would reduce VMT throughout the city. Additionally, CARB's LCFS, which aims to reduce the carbon intensity of the life cycle of gasoline and diesel fuels by 10 percent by 2020, would further assist in meeting energy reduction goals and GHG emission reduction targets. Therefore, impacts were determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning conflicting with a State or local plan for renewable energy or energy efficiency as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.7 GEOLOGY AND SOILS

This section corresponds with 2035 General Plan EIR Section 3.6, *Geology, Soils, and Seismicity.*

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

According to the 2035 General Plan EIR, the majority of the Alquist-Priolo designated zones and other fault lines are outside of the Planning Area, some of these faults extend into the south and northeast portions of the Planning Area. A San Bernardino County Designated Fault Zone is in the Crafton Hills portion of the Planning Area. Within these areas, the General Plan allows for some residential land uses that are very low density. However, potential adverse effects on people or structures from the rupture of a known earthquake fault would be minimized to the greatest extent feasible by CBC requirements that protect buildings from fault rupture and the policies proposed in the General Plan Update listed below that require geotechnical reports and continued restrictions near active/potentially active faulting. Thus, impacts related to fault rupture were determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning earthquake fault rupture as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

ii) Strong seismic ground shaking?

According to the 2035 General Plan EIR, earthquakes in and near the Planning Area have the potential to cause ground shaking of significant magnitude. The General Plan would allow for additional development within the city, which could expose people and property to strong seismic ground shaking. However, new buildings would be constructed in compliance with the CBC. Section 1613 of the CBC requires all structures be designed and constructed to resist the effects of earthquake motions in accordance with the Minimum Design Loads for Buildings and Other Structures established by the American Society of Civil Engineers. Additionally, the General Plan policies would further reduce any potential impacts associated with strong seismic ground shaking. Therefore, impacts to people and structures from strong seismic ground shaking would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies

future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning seismic ground shaking compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

iii) Seismic-related ground failure, including liquefaction?

According to the 2035 General Plan EIR, several locations within the Planning Area are considered prone to liquefaction hazards. The areas in the northern part of the Planning Area, around the Santa Ana River, Mentone Boulevard, and Mill Creek Road are susceptible to liquefaction. Damage from earthquake-induced ground failure associated with liquefaction could be high in buildings constructed on improperly engineered fills or saturated alluvial sediments that have not received adequate compaction or treatment in accordance with current building code requirements. Ground failure, including liquefaction, as a result of an earthquake could occur in the Planning Area depending on the underlying conditions including moisture content, relative size of soil particles, and density of subsurface materials within 50 feet of ground surface.

The General Plan designates most of the areas susceptible to liquefaction as Open Space, but it allows for some additional industrial, commercial, and low-density residential development in the Planning Area. The 2035 General Plan EIR determined that impacts from ground failure, including liquefaction, from development of land uses associated with the project would be addressed through site-specific geotechnical studies prepared in accordance with CBC requirements and standard industry practices. Subsequent development would be required to conform to the current seismic design provisions of the CBC to minimize losses from ground failure as a result of an earthquake. These future projects would also be required to adhere to Project policies that contain seismic safety requirements and help strengthen existing code requirements such as limiting the disturbance of natural terrain and vegetation to the minimum necessary to accommodate reasonable use of property. Therefore, the potential impact related to seismically related ground failure including liquefaction is less than significant. Furthermore, the General Plan does not designate any new residential or commercial land uses in high liquefaction susceptibility areas beyond those designated in the current General Plan.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning seismic-related ground failure as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

iv) Landslides?

According to the 2035 General Plan EIR, landslide-susceptible areas are primarily located in various parts of southern Redlands and some smaller parts in the eastern side of the Planning Area. Landslides may occur on slopes of 15 percent or less. However, the probability is greater on steeper slopes that exhibit old landslide features such as scarps, slanted vegetation, and transverse ridges. Landslide susceptible areas are characterized by steep slopes and downslope creep of surface materials.

The 2035 General Plan EIR determined impacts from landslides on development of future land uses associated with buildout of the General Plan would be addressed through site-specific geotechnical studies prepared in accordance with CBC requirements and standard industry practices, which would specifically address landslide hazards located in landslide hazard areas. Development would conform to the current design provisions of the CBC to mitigate losses from landslides. Proposed developments would also adhere to the development requirements contained in the proposed policies below as well as the existing regulations to resist landslides through modern construction design, slope stabilization techniques, and density limits. Therefore, the potential for adverse landslide impacts related to proposed changes from buildout of the General Plan was considered less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning landslides as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Result in substantial soil erosion or the loss of topsoil?

According to 2035 General Plan EIR, development associated with the General Plan would likely include earthwork activities that could expose soils to the effects of erosion or loss of topsoil. Once disturbed, either through removal of vegetation, asphalt, or an entire structure, stockpiled soils can be exposed to the effects of wind and water if not managed properly. Generally, earthwork and ground-disturbing activities, unless below minimum requirements, require a grading permit, compliance with which minimizes erosion, and the City's grading permit requirements ensure that construction practices include measures to protect exposed soils such as limiting work to dry seasons, covering stockpiled soils and use of straw bales and silt fences to minimize offsite sedimentation.

In addition, development that disturbs more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit, including the implementation of best

management practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil, and the implementation of a storm water pollution prevention plan (SWPPP) through the local jurisdiction. BMPs that are required under a SWPPP include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. Generally, once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially eliminated or reduced. Therefore, the potential for adverse soil erosion and topsoil loss impacts related to land use changes from implementation of the General Plan was determined to be less than significant with implementation of General Plan polices.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning substantial soil erosion as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

According to the 2035 General Plan EIR, some improvements associated with buildout of the General Plan could be located on geologic units or soils that are unstable, or that could become unstable and result in geologic hazards if not addressed appropriately. However, the potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as CBC requirements which are used to minimize the risk associated with these hazards. Geotechnical investigations would be required to thoroughly evaluate site-specific geotechnical characteristics of subsurface soils and bedrock to assess potential hazards and recommend site preparation and design measures to address any hazards which may be present. These measures are enforced through compliance with the CBC to avoid or reduce hazards relating to unstable soils and slope failure. In addition, General Plan policies would help ensure that potential impacts related to unstable units are minimized and would reduce the potential impact to less than significant. The potential for landslide, lateral spreading, subsidence, liquefaction, or collapse impacts related to changes from implementation of the General Plan were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035

General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning unstable geologic units or soils that have the potential to result in landslides, lateral spreading, subsidence, and liquefication or collapse as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Refer to Response 3.7(c). The project would not result in new or substantially more severe environmental impacts concerning expansive soil as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

According to the 2035 General Plan EIR, future development that may result from buildout of the General Plan in areas where sewers are not available could include septic systems or other alternative wastewater disposal systems. The City of Redlands Municipal Code prevents well drilling near septic tanks. Furthermore, General Plan policies would make sure that future development in areas where sewer systems are not available would not impair the surrounding soil's ability to support the use of alternative wastewater disposal systems. Impacts related to soils capability to support wastewater disposal were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning septic tanks and wastewater as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

According to the 2035 General Plan EIR, some portions of the City, especially in San Timoteo Canyon, are underlain by geologic formations that have yielded fossiliferous materials. It is possible that future development or public works activities within the city could cause significant impacts on these resources if they are disturbed during grading or excavation activities. Implementation of the General Plan would not directly result in physical construction that could impact paleontological resources. However, future development and redevelopment allowed under the General Plan could result in direct or indirect impacts on paleontological resources. Construction activities such as grading, excavation, and ground disturbing activities may result in the accidental destruction or disturbance of paleontological sites.

However, the 2035 General Plan EIR disclosed that the majority of development anticipated under the General Plan would involve redevelopment of or new development within existing developed areas. Substantial excavation activities for installation of new infrastructure would be limited to new development in undeveloped areas; potential for this type of development does exist but is limited by the General Plan. For example, in the General Plan, undeveloped areas in San Timoteo Canyon are designated for land uses with extremely low development potential, including Resource Preservation, Open Space, and Parks/Golf Courses. Other undeveloped areas in the Planning Area's periphery, including the Santa Ana River Wash, Mentone, and Crafton, would be designated with low-density or open space uses as well. Thus, the likelihood of finding new or undiscovered paleontological resources would be limited. In addition, the General Plan includes the policies that would minimize or avoid impacts on paleontological resources, in addition to subsequent measures to be implemented as applicable. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning paleontological resources as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.8 GREENHOUSE GAS EMISSIONS

This section corresponds with 2035 General Plan EIR Section 3.5, *Energy, Greenhouse Gases, and Climate Change.*

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Based on the 2035 General Plan EIR, Planning Area GHG emissions from the 2015 inventory were 472,651 $MTCO_2e$ per year, or 6.1 $MTCO_2e$ per capita per year. Through General Plan policies and other city programs, such as the Redlands Bicycle Master Plan, the Transit Villages Specific Plan, and the City's CAP, GHG emissions are expected to be reduced on a per capita basis. In total, the City's previously-identified strategies would reduce GHG emissions to 363,092 $MTCO_2e$ in 2020 and 359,358 MTCO2e by 2035, or 4.8 and 4.5 $MTCO_2e$ per capita, respectively. These plans and programs that reduce GHG emissions would continue with implementation of the project. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning greenhouse gas emissions as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Based on the 2035 General Plan EIR, the implementation of the General Plan policies aimed at reducing GHG emissions, and the CAP that would serve as the implementation tool for GHG monitoring and reporting, number of strategies and measures aimed at reducing greenhouse gas emissions would be implemented. Additionally, the SCAG RTP/SCS includes a set of policy objectives related to mobility, reliability, system preservation and safety, social equity, healthy environment, and economic growth. The RTP will assist in SCAG's implementation of SB 375, the California Global Warming Solutions Act of 2006, and regional GHG targets. With implementation of the General Plan's goals and policies related to sustainability and multi-modal transportation objectives, the General Plan would complement the goals and policies of the RTP/SCS and would continue to carry out the goals of AB 32 and SB 375. Therefore, future development projects and land uses proposed under the General Plan and the City's CAP would, by nature, result in reduced transportation GHG emissions. This achieves the overarching goals of local, regional, and State plans to reduce GHG emissions. Impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.9 HAZARDS AND HAZARDOUS MATERIALS

This section corresponds with 2035 General Plan EIR Section 3.7, *Hazards and Hazardous Materials*.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

As stated in the 2035 General Plan EIR, implementation of the General Plan would allow for the development of land uses, including residential, mixed-use, recreational, industrial, commercial, and office uses, that may require the routine use, transport, and disposal of hazardous material and waste within the Planning Area. Additionally, future construction activities associated with buildout of the General Plan may generate hazardous materials and waste, such as fuels and oils from construction equipment and vehicles. Federal and State regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. There are currently no permitted hazardous waste facilities in the Planning Area. Any future disposal of hazardous waste by a hazardous waste generator, transporter, or treatment storage and disposal facility would require compliance with relevant federal and State law, including permitting through the DTSC and compliance with the SBFD's CUPA requirements for hazardous waste generation and onsite treatment.

Policies in the General Plan seek to ensure that more intense land uses that may be more likely to utilize hazardous materials are sufficiently buffered from lower intensity uses such as residential. Proposed policies also seek to ensure that all projects, including those using hazardous materials, meet development standards to ensure public safety, and that emergency responders have the appropriate facilities and agreements in place to act quickly in case of an upset.

Implementation of applicable federal, State, and local regulations and policies would serve to lessen the risk of death, injury, and/or property loss associated with the transport, use, or disposal of hazardous materials by promoting safe handling and storage, documentation and information sharing, and appropriate emergency planning and response. In addition, compliance with General Plan policies would further ensure safe practices regarding hazardous materials. Therefore, the 2035 General Plan EIR determined that compliance with the General Plan policies and federal and State regulations will ensure the impact of routine use, transport, and disposal of hazardous materials associated with implementation of the General Plan would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental

impacts concerning the transportation, use, or disposal of hazardous materials as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As stated in 2035 General Plan EIR, implementation of the General Plan would result in future development of land uses that would involve the use, transportation, disposal, and storage of hazardous materials in the Planning Area. Thus, personal injury, property damage, environmental degradation, or death could result from the release of hazardous materials caused by upset or accident conditions. Although the risk of upset and accident conditions involving the release of hazardous materials into the environment cannot be eliminated, it can be reduced to a manageable level. Existing regulations at the Federal, State, and local levels serve to minimize the potential for upset during routine transportation, use, and disposal. Additionally, regulations are in place to minimize the risk of upset or accident involving sites that have previously been contaminated by hazardous substances. Proper implementation of the SBFD's CUPA programs would help to ensure documentation of releases and threatened releases as well as the development of risk management and hazardous materials release response plans. Given existing regulations and programs and General Plan policies that reduce the potential for hazardous materials upsets and promote the ability of emergency services to respond to incidents, impacts associated with the release of hazardous materials into the environment were determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning the accidental release of hazardous materials into the environment as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

As stated in the 2035 General Plan EIR, the General Plan would allow land uses that would be reasonably expected to handle hazardous materials or generate hazardous emissions. Under the land use designations

of the General Plan, there would be a range of land uses potentially allowed within a quarter-mile of existing schools (there are no proposed schools). The most intense uses allowed under the General Plan, under the Light Industrial or Commercial/Industrial designations, include manufacturing, distribution, research and development, and ancillary commercial uses for the former; and auto services, commercial retail and services, manufacturing for the latter. Heavy industries would only be permitted in areas designated by the proposed Santa Ana River Wash Plan, located away from any schools. The proposed CAP does not propose any land use changes and would not directly affect the siting of future development.

According to the 2035 General Plan EIR, future projects associated with buildout of the General Plan would be subject to regulations regarding the siting of uses handling hazardous materials. Furthermore, individual users of hazardous materials would continue to be regulated by local disclosure, permitting, and notification requirements of the "Disclosure of Hazardous Materials" program consistent with all Federal, State, and local laws. Public schools are also required to evaluate and potentially amend their school safety plan on an annual basis. In the case that new schools or alterations to existing schools would be required in the future, the siting of schools, including existing facilities and upgrading construction projects, would be regulated by the California Department of Education; and new facilities would not be constructed within a quarter mile of facilities emitting or handling materials consistent with California Department of Education requirements. In addition, General Plan policies encourage compatibility of adjacent land uses, require buffering between high- and low-intensity land uses, prohibit the creation of harmful emissions, allow for the availability of information regarding hazardous materials for school planning, and provide for emergency planning to address potential upsets. Therefore, impacts were determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning hazardous materials in relation to schools as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As stated in 2035 General Plan EIR, there are numerous sites in the Planning Area that are included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Several of the sites have reported releases to the ground resulting in soil and groundwater contamination and which are subject to various State and Federal laws and regulators, including CERCLA, EPA, DTSC, and the RWQCB, and are in various stages of the cleanup process as stipulated by the relevant agencies. Redevelopment of sites with existing soil or groundwater contamination in accordance with the Project could potentially pose a significant hazard to the public or the environment through releases of hazardous

materials into the environment. However, these sites are regulated by existing Federal and State policies and have been or are being investigated and remediated.

The 2035 General Plan EIR determined that General Plan policies would limit any impacts on new development from listed hazardous materials sites. Existing regulations and CUPA programs would also help by ensuring the reporting and documentation of any hazardous materials incidents in the Planning Area such that property owners could be aware of potential hazards. For future projects, CEQA requires developers to reference the Cortese List and state if the project or any alternatives would be located on a listed site. Based on these policies, regulations, and programs, impacts were determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning sites containing hazardous materials as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

As stated in 2035 General Plan EIR, the Planning Area includes portions that are within the airport land use plan area of the Redlands Municipal Airport or within two miles of the San Bernardino International Airport (SBIA). General Plan policies ensure that future development would be compatible with the policies and standards of the ALUCP. Such policies would ensure that future residential development occurs within the range allowed by the ALUCP. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning airport safety and noise as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As stated in the 2035 General Plan EIR, physical development within the Planning Area, including new roadways, land uses, and increased densities, could create obstacles to the implementation of emergency response or evacuation plans adopted for the Planning Area. However, policies in the General Plan would eliminate or reduce these impacts by seeking to utilize the Redlands HMP, which is consistent with the MJHMP, as a guide for emergency planning, thus considering the area's hazards and promoting means to reduce local risks, as well as to improve emergency access, ingress, and egress, emergency preparedness, and inter-jurisdictional cooperation throughout the Planning Area. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning emergency response or evacuation plans as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As stated in the 2035 General Plan EIR, a majority of Redlands is characterized by Cal Fire as having a Moderate fire threat level, with areas of High, Very High, and Extreme threat found on the periphery of the city and in the SOI outside of city limits: in the canyonlands, Crafton, Mentone, and in the Santa Ana River Wash. Some areas of Little or No Threat can be found along San Timoteo Creek and the Santa Ana River. Areas of High to Extreme fire threat are characterized by natural vegetation that can serve as fuel for wildland fires, and steeper topographies that can impede emergency access and facilitate the rapid spread of potential fire.

Areas identified as High to Extreme fire threat correspond to General Plan land use designations associated with open space, agriculture, and very low residential densities, which would minimize the exposure of people and structures to fire hazards. In Crafton, where some residential development could be allowed under the Rural Living, Very Low Density Residential, Low Density Residential, and Hillside Conservation land uses, projects would be constrained by terrain and General Plan policies that limit development based on slope and emergency access in order to reduce the safety risks associated with these factors. The Hillside Conservation designation would only allow development if it would not negatively impact public safety or welfare. Proposed policies for the canyonlands would require fire safety measures including access roads to be in place before any development could be allowed, though most land in the canyons would be designated as Resource Preservation and thus developed at a low-density rate. New development that occurs

pursuant to the Project would generally take place within areas shown with Moderate fire threat, which covers most of the already urbanized portions of the Planning Area accessible to emergency services and managed vegetation. In general, proposed policies would require all development to adhere to safety standards provided in the CBC and California Fire Code, and would promote close coordination with the Redlands Fire Department and the fire services of neighboring jurisdictions to ensure the safety of new development. Land use patterns that limit new development in areas of High to Extreme fire threat; proposed policies that promote fire safety through agency cooperation and management of risk factors associated with fire threat; adherence to applicable building and fire codes; and existing programs such as weed abatement and education under the Redlands Fire Department and fire services in neighboring jurisdictions would serve to reduce any impacts related to the exposure of people or structures to wildland fire to less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning wildland fires as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.10 HYDROLOGY AND WATER QUALITY

This section corresponds with 2035 General Plan EIR Section 3.9, *Hydrology and Water Quality.*

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

According to the 2035 General Plan EIR, buildout of the General Plan would have a significant environmental impact if it would violate water quality standards and waste discharge requirements set out in Municipal Permit Order No. R8-2010-0036, NPDES Permit No. CAS618036, issued by the Santa Ana RWQCB. Violation of these permits could occur if the Project would substantially increase pollutant loading levels in the sanitary sewer system or in groundwater underlying the city, either directly through the introduction of pollutants generated by industrial land uses, or indirectly through stormwater pollution. As National Pollutant Discharge Elimination System (NPDES) Permit CAS618036 is based on the federal Clean Water Act, compliance with the Porter–Cologne Water Quality Control Act (Division 7 of the Water Code, commencing with Section 13000), applicable state and federal regulations, all applicable provisions of statewide water quality control plans and policies adopted by the SWRCB, the Basin Plan adopted by the RWQCB, the California Toxics Rule, the California Toxics Rule Implementation Plan, and NPDES would ensure compliance with other applicable plans and regulations pertaining to water quality.

In addition, every construction activity within the Planning Area that has the potential to negatively affect water quality is required to comply with the NPDES Stormwater Discharge Permit. Implementation of practices required by the NPDES Permit would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring on site, generally improving the quality of stormwater before it enters the city's stormwater system.

Furthermore, the General Plan contains goals and policies pertaining to water quality that will promote protection to city's natural water bodies, prevent water pollution, ensure preparation and implementation of applicable water quality
Plans, require incorporation of BMPs, and ensure compliance with the city's NPDES Permit and other related regulations. Overall, the General Plan's policies would promote improved water quality in the Planning Area and continued compliance with Federal, State, and local water quality regulations, and would ensure that water quality is protected to the maximum extent practicable. Therefore, the 2035 General Plan EIR determined that impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning surface or groundwater quality as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

According to the 2035 General Plan EIR, the Planning Area is located in the Upper Santa Ana Valley Groundwater Basin. The City's domestic water wells constitute about 50 percent of the water supply, and the General Plan would allow for additional development within the Planning Area that could increase demands for water. However, the General Plan policies, along with water conservation policies would help to conserve groundwater in the Planning Area. Furthermore, the City's Well Drilling Ordinance protects groundwater from potential sources of contamination resulting from well drilling. The proposed CAP does not include any land use changes or other measures that would impact groundwater supplies. Overall, the 2035 General Plan EIR determined that impacts on groundwater would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental

impacts concerning groundwater supplies or groundwater recharge as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or rive or through the addition of impervious surfaces, in a manner that would:

i) Result in substantial erosion or siltation on- or off-site?

According to the 2035 General Plan EIR, the implementation of the General Plan would not involve the direct alteration of existing streams, rivers, or other drainage patterns. However, future development/redevelopment allowed under the General Plan could impact the existing drainage system. Increases to impervious surfaces, such as roofs, patios, driveways, and parking areas would lead to increased stormwater flow. The General Plan would allow for additional development that could increase the number of impervious surfaces within the city and could increase runoff from these sites into the local storm drains in the Planning Area. An increase in runoff volumes could result in hydromodification effects, such as erosion, siltation, and flooding on the hydrological systems within the Planning Area, which occur when rainfall runoff is increased from impervious areas above the natural rainfall rate that would otherwise occur. However, most of the development that may occur in the Planning Area is redevelopment of areas with already impervious surfaces.

Furthermore, the City recognizes the importance of water quality and preventing hydromodification. Any development that would occur under the General Plan would be subject to City's Flood Damage Prevention ordinance that helps prevent flood damage resulting from hydromodification. Adherence to the City's Storm Drains Ordinance would limit surface runoff from development under the General Plan, reducing siltation and erosion. In addition, the General Plan's goals and policies are intended to preserve natural watercourses or naturalized drainage channels, and to ensure future development incorporates BMPs to reduce runoff from a site. For these reasons, the 2035 General Plan EIR determined that impacts associated with the General Plan would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning erosion as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Refer to Response 10(c)(i) above.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

According to the 2035 General Plan EIR, implementation of the General Plan would not involve the direct alteration of existing streams, rivers, or other drainage patterns. However, future development/redevelopment allowed under the General Plan could impact the existing drainage system. Increases to impervious surfaces, such as roofs, patios, driveways, and parking areas would lead to increased stormwater flow. Additionally, every construction activity within the Planning Area that has the potential to negatively affect water quality must prepare a construction Stormwater Pollution Prevention Plan (SWPPP). Projects that would result in the disturbance of one acre or more of pervious surface or would create more than 10,000 square feet of impervious surfaces are subject to the NPDES Stormwater Discharge Permit and stormwater pollution prevention requirements.

Furthermore, the proposed goals and policies promote the protection of the city's natural water bodies, prevent water pollution, ensure preparation and implementation of applicable water quality plans, require incorporation of BMPs, and otherwise ensure compliance with the City's NPDES Permit and other related regulations. Overall, the proposed General Plan's goals and policies would promote improved water quality in the city and continued compliance with Federal, State, and local water quality regulations, and would ensure that water quality is protected to the maximum extent practicable. The 2035 General Plan EIR determined that impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts stormwater drainage or runoff as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

According to the 2035 General Plan EIR, the Planning Area is located sufficiently inland to be out of what would be considered a potential hazard area for seiches, tsunamis, and sea level rise. Mudflow, also known as a landslide or mudslide, is a flow of dirt and debris that occurs after intense rainfall or earthquakes. The speed of the mudflow is dependent on the amount of precipitation, steepness of slope, and vibration of the ground. Potential impacts of the proposed General Plan related to mudflow are reduced by CBC design provisions, geotechnical investigation requirements, modern construction design, slope stabilization techniques, and density limits. The 2035 General Plan EIR determined that compliance with the City's existing regulations pertaining to flooding and landslide hazards, along with the proposed General Plan policies would ensure the impacts associated with mudflow would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning floods, tsunamis, or seiches as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

According to the 2035 General Plan EIR, the General Plan would allow for new development that could potentially degrade water quality. However, development would be subject to the RWQCB requirements and City of Redlands Municipal Code. Furthermore, the General Plan contains goals and policies pertaining to water quality, as described previously. Overall, the General Plan's goals and policies would promote improved water quality in the Planning Area and continued compliance with Federal, State, and local water quality regulations, and would ensure that water quality is protected to the maximum extent practicable. Therefore, the General Plan would not substantially degrade water quality and the 2035 General Plan EIR determined impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning a water quality control plan as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.11 LAND USE AND PLANNING

This section corresponds with 2035 General Plan EIR Section 3.10, *Land Use and Housing.*

Would the project:

a) Physically divide an established community?

As stated in the 2035 General Plan EIR, the General Plan would not result in uses or development that would physically divide any established community. Additionally, the General Plan does not propose new highways or infrastructure facilities that would physically divide the community. Rather, by improving connectivity and land use consistency within and between existing neighborhoods, the General Plan provides more linkages within the city and the region. Policies are proposed that seek to minimize the impact of the interstate highway as a physical barrier and unite the northern and southern parts of the city through land uses, infrastructure, and design. Therefore, implementation of the General Plan would not cause an adverse impact in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning the physical division of established communities as compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The 2035 General Plan EIR concluded that, since the General Plan would update policies and land use designations for future development, it may naturally be inconsistent with existing planning regulations, such as density/intensity standards and allowed uses, that were designed to implement the current General Plan. These existing regulations must be updated to be consistent with and/or effectively implement the proposed project if it were adopted. Amendments to the General Plan may also be needed from time to time to conform to State or federal laws passed since adoption of the General Plan, and to eliminate or modify

policies that may become obsolete or unrealistic due to changed conditions. Additionally, the City's Zoning Ordinance would be revised to implement the proposed project, and it will translate the proposed General Plan policies into specific use regulations, development standards and performance criteria that will govern development on individual properties. The Zoning Ordinance prescribes standards, rules, and procedures for development under the project. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning existing land use plans compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.12 MINERAL RESOURCES

This section corresponds with 2035 General Plan EIR Section 3.11, *Mineral Resources*.

Would the project:

a) Result in the loss of availability of a known mineral resource of value to the region and the residents of the State?

According to 2035 General Plan EIR, the General Plan includes changes to land use designations in areas designated by The State Mining and Geology Board (SMGB) as containing regionally significant aggregate resources classified as the Mineral Resource Zone-2 (MRZ-2). Given that the General Plan would continue to apply a land use designation appropriate for mining to nearly all SMGB-designated land in the Planning Area; would not create land use conflicts with any existing mining operation; and is compatible with the Wash Plan, which would not significantly impact mineral resource availability within its planning area; the 2035 General Plan EIR determined that the General Plan would have a less than significant impact on the availability of a known mineral resource that would be of value to the region and the residents of the state.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning mineral resources compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

According to 2035 General Plan EIR, the General Plan does not contain land use changes or policies that would affect existing mining operations within or adjacent to the Planning Area. The General Plan does not designate any locally important mineral resource recovery sites in the Planning Area, though it does include the Flood Control/Construction Aggregates Conservation/Habitat Preservation land use designation which applies to land that would potentially be used for aggregate mining activities. All areas containing existing mining uses in areas that are currently designated as Flood Control/Construction Aggregates Conservation/Habitat Preservation would be redesignated as Open Space, which would include construction aggregate mining as a conditionally permitted land use in the same fashion as the existing Flood Control/Construction Aggregates Conservation/Habitat Preservation designation. Similarly, no proposed land use changes would conflict with the Wash Plan, which applies an Aggregate Mining designation to portions of the Santa Ana River Wash with existing mining activity or that are suitable for future potential mining activity. Policies in the General Plan would support the implementation of the Wash Plan and its designations. No impact was identified in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts concerning the availability of locally-important mineral resources compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.13 NOISE

This section corresponds with 2035 General Plan EIR Section 3.12, *Noise*.

Would the project result in?

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

According to the 2035 General Plan EIR, implementation of the General Plan may result in both temporary and permanent increases in ambient noise levels. Specific developments under the proposed project could expose existing and/or new sensitive uses to stationary noise sources, such as industrial and/or commercial uses. The development of new commercial and industrial uses pursuant to the General Plan may increase noise levels in their vicinity due to the establishment of new stationary noise sources. Although vehicular noise is exempt from local regulation when operating on public streets, cities and counties can regulate vehicular noise while operating on private property. The use of heavy trucks on private properties (e.g., making deliveries to commercial and industrial uses) would result in noise levels of 73 dBA at 50 feet from the source of the noise (e.g., truck's engine, idling trucks). The use of multiple trucks on a site, such as might occur at a warehouse, would generate noise levels of about 80 dBA Leq as measured at 50 feet. Industrial processing equipment and conducting outdoor industrial activities could also generate increased noise levels. New projects developed under the General Plan would be subject to the City's noise ordinance. Compliance the City's noise ordinance in the Municipal Code in Sections 8.06.070 and 8.06.080, would result in less than significant noise impact. Implementation of the General Plan principals and actions would further reduce the impacts from stationary noise sources on sensitive land uses and include mechanisms to ensure appropriate review and placement of noise reduction requirements on new development.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to ambient noise levels compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Generation of excessive groundborne vibration or groundborne noise levels?

As stated in 2035 General Plan EIR, implementation of the General Plan may result in groundborne vibration, but the increases associated with various sources would be less than significant, as discussed below.

<u>Construction Vibration</u>

Future development under the General Plan would generate excessive groundborne noise and vibration near construction sites, and if sensitive receptors or land uses are adjacent to these sites, there could be significant impacts from groundborne noise or vibration. Construction activities can produce vibration that may be felt by adjacent land uses. If construction of a particular development did not require the use of equipment, such as pile drivers, known to generate substantial construction vibration levels, the primary source of vibration during construction would likely be from bulldozer and truck operation.

Vibration generated by construction equipment can result in varying degrees of ground vibration, depending on the equipment. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings situated on soil near the active construction area respond to these vibrations, which range from imperceptible to low rumbling sounds, with perceptible vibrations and slight damage at the highest vibration levels. Typically, construction-related vibrations do not reach vibration levels that would result in damage to nearby structures.

Traffic Vibration

The General Plan update would allow for future land development, which would not in and of itself generate any traffic vibration levels. Vehicular traffic would generate groundborne vibration and are typically caused by poor road conditions, such as potholes, bumps, expansion joints, or other discontinuities in the road surface. Passenger vehicles and trucks would cause effects such as rattling of windows, and the source would almost always be airborne noise. For areas within the Planning Area where the General Plan update would not improve roadways, vibration levels generated from vehicular traffic would not change. For areas within the Planning Area where the General Plan would improve roadways, vibration levels generated from vehicular traffic would be reduced because potholes, bumps, or other discontinuities in the road surface would be addressed. Therefore, groundborne vibration impacts generated by vehicles traveling within the Planning Area would be considered less than significant.

Rail Vibration

The operations of the Union Pacific Railroad (UPRR) currently generate vibration levels. Although existing train operations generate vibration levels, the General Plan would not change vibration levels generated from trains.

In addition, all future developments within the City that fall within the required noise screening distances as specified in the FTA Noise and Vibration Manual, a detailed noise analysis would be required. The screening distance for commuter rail is 750 feet with no obstruction between the rail line and receptor and 375 feet with intervening buildings. Therefore, vibration levels generated from trains would be considered less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to groundborne vibration or noise levels compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) For a project located within the vicinity of a private airstrip an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use

airport, would the project expose people residing or working in the project area to excessive noise levels?

As detailed in 2035 General Plan EIR, The Redlands Municipal Airport is in the northeast part of the city. Residential uses and a school located south of the Redlands Municipal Airport would have the potential to be exposed to aircraft noise levels exceeding 60 dBA CNEL. However, the General Plan would not change the land use of the existing residences and one school located within the 60 dBA CNEL contours for the Redlands Municipal Airport. Future residences would include noise attenuation consistent with the Noise Element of the General Plan and the ALUCP for the Redlands Municipal Airport. Impacts due to aircraft noise were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to airport noise compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No new additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.14 POPULATION AND HOUSING

This section corresponds with 2035 General Plan EIR Section 3.10, *Land Use and Housing.*

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Based on the 2035 General Plan EIR, about 6,400 housing units are projected to be built in the Planning Area by 2035, approximately 2,900 more units than the project is proposed to zone for. The project continues to focus infill residential development opportunities in vacant areas in Redlands, while existing General Plan policies seek to preserve existing neighborhoods. However, the General Plan would increase the overall number of dwelling units and provide housing to serve the diverse needs of the community, meaning potentially displaced people would be able to find housing elsewhere in the community. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of

the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to unplanned population growth compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

According to the 2035 General Plan EIR, buildout of the General Plan would not directly displace any housing units, businesses, or people. Redevelopment of existing uses will likely occur; however, such development will take place over time as the market allows and will result in a net increase in residential units. Though it is impossible to guarantee residents will not be displaced as a result of implementation of the project, General Plan policies seek to preserve existing neighborhoods. The project would accommodate an increase in housing opportunities in the City and would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to displacement compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.15 PUBLIC SERVICES

This section corresponds with 2035 General Plan EIR Section 3.13, *Public Facilities and Services.*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable serve ratios, response times or other performance objectives for any of the public services:

i) Fire Protection?

With a projected increase in population of about 16,400 additional residents in the Planning Area at General Plan buildout, the 2035 General Plan EIR concluded that demand for fire protection services will increase. Population increases may result in increased alarms and call volumes that may negatively impact Fire Department response times unless adequate staffing and facilities are maintained. The majority of new development under the project will be located in infill sites in urbanized areas of the city, most of which are in areas of low fire hazard severity. Due to the minimal effects that the development of new facilities would have on the environment, the concentration of most new development in areas already well-served by fire protection services, and the addition of policies to reduce fire hazards in the city, this impact was determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to fire protection compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Police Protection?

According to the 2035 General Plan EIR, the General Plan policies aim to mitigate increases in demand for police services. Policies include those that encourage physical planning and community design practices that promote safety, as well as policies that include residents in community safety efforts. Because meeting facilities needs for an expanded Police Department would not pose detrimental environmental impacts, and because policies and Mitigation Measure 4.9-a promote improved public safety, this impact was determined to be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to police protection compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Schools?

The 2035 General Plan EIR determined the school-aged population is expected to increase. This increase will impact enrollment totals in Redlands Unified School. District (RUSD) facilities in the Planning Area. Although ongoing demographic trends are causing reductions in the percentage of school-aged children compared to the total population, the projected population increase would result in the number of elementary school students exceeding school capacity. According to the California Department of Finance projections, San Bernardino County's school-aged population as a percentage of the total population is likely to decline slightly over the planning horizon: the percentage of the population aged 5 to 17 is projected to decline by about 2 percent, from 19.79 percent of the population to 17.22 percent.

As discussed in the 2035 General Plan EIR, RUSD can utilize trailers and temporary classrooms to accommodate students in the interim, but a new school may be required for the long run. The school district owns land north of Mission Road just outside the Planning Area in Loma Linda, which could be utilized to the construction of a new facility, if necessary. The policies included in the General Plan would ensure that school facilities are expanded to meet demand as development occurs. Development of schools would require project-level environmental review and site-specific mitigation measures as appropriate, ensuring that adverse environmental effects are avoided or mitigated. This impact was considered less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to schools compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No new additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Parks?

According to the 2035 General Plan EIR, at buildout, the General Plan may generate an increase in population of up to 10,964 residents in the City of Redlands. Without the development of new parks, this increase would place additional physical demands on existing parks and facilities. An increase in the number of park users would cause parks to be in active use for longer periods of time and/or used more intensively over the course of a typical day. As a result, vital park elements such as vegetation, water resources, built structures, walking/biking paths, sport facilities, and others would face increased wear-and-tear over the course of the planning period and, without proper maintenance, their useful life could be shortened.

The General Plan calls for the addition of several parks in the Sphere of Influence (SOI) outside of city limits an area that is underserved by parkland. This increase would improve the ratio of park acres per 1,000 residents in the SOI outside of city limits and the Planning Area as a whole. With about 16,355 new

residents expected in the Planning Area in 2035, the 140.9 acres of proposed parkland in Redlands in addition to 55 acres of proposed parkland in the SOI outside of city limits would result in a ratio of 6.4 acres per 1,000 residents in the Planning Area as a whole, which would also exceed the City's park standard of 5 acres per 1,000 people.

The General Plan provides for new parkland to serve the city's population as it expands. With the City's development impact fees, this would ensure that new parkland is distributed evenly throughout the Planning Area, thus preventing any existing neighborhood, community, or regional parks, or other recreational facilities from overuse that could result in the physical deterioration of those facilities. Additional policies requiring proper maintenance of existing and future recreational facilities also serve to ensure that the Planning Area's parks remain in good physical condition. The development of new recreational facilities would be subject to existing building and construction regulations that would ensure that construction activities have a minimal effect on the surrounding environment. These, along with General Plan policies established to protect biological resources and air and water quality, ensure that the General Plan would have a less than significant impact on the physical and environmental quality of Redlands' parks.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to parks compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) Other public facilities?

The 2035 General Plan EIR determined that the projected increase of about 16,400 residents in the Planning Area by 2035 will likely increase demand for library and other community services. A portion of this increase in demand can be accommodated by extending the hours of operation of the Smiley Library. Owing to the gradual nature of this facilities need, the General Plan policies for new development, and the continued assessment of existing library facilities and services would ensure that significant environmental impacts from the provision of additional library space would not occur. In addition, development impact fees from new development would serve to ensure that improvements are made in a timely manner so as to avoid the deterioration of existing library facilities. The development of new library facilities would be subject to existing building and construction regulations that would ensure that construction activities have a minimal effect on the surrounding environment, while project-level environmental review and site-specific mitigation measures would help ensure that adverse environmental effects are avoided or mitigated. This impact was concluded to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City

review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to other public facilities compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.16 RECREATION

This section corresponds with 2035 General Plan EIR Section 3.13, *Public Facilities and Services.*

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Based on the 2035 General Plan EIR, the General Plan provides for new parkland to serve the city's population as it expands. With the City's development impact fees, this would ensure that new parkland is distributed evenly throughout the Planning Area, thus preventing any existing neighborhood, community, or regional parks, or other recreational facilities from overuse that could result in the physical deterioration of those facilities. Additional policies requiring proper maintenance of existing and future recreational facilities also serve to ensure that the Planning Area's parks remain in good physical condition. The development of new recreational facilities would be subject to existing building and construction regulations that would ensure that construction activities have a minimal effect on the surrounding environment. These, along with General Plan policies established to protect biological resources and air and water quality would ensure that the General Plan would have a less than significant impact on the physical and environmental quality of Redlands' parks.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to parks or recreational facilities compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Refer to Response 3.6(a).

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact with Mitigation.

3.17 TRANSPORTATION

This section corresponds with 2035 General Plan EIR Section 3.15, *Transportation.*

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

As detailed in the 2035 General Plan EIR, impacts from the General Plan on the vehicular network were forecasted for intersection, roadway, and freeway analysis. Projected LOS were compared to the performance criteria for the applicable jurisdictions to determine whether a significant impact would occur. For intersections and roadway segments, if all roadway improvements in the General Plan were implemented, impacts would be less than significant. However, because eight of the proposed improvements would be located on facilities partially or fully controlled by other jurisdictions, the City of Redlands could not guarantee implementation. Therefore, some impacts could occur that would be significant and unavoidable. In addition, four freeway segments were determined to experience significant and unavoidable impacts. The impacts on the freeway system are not in the City's control as these would occur due to regional growth and would occur with or without the implementation of the General Plan, creating a significant and unavoidable impact. These impacts are discussed in more detail below.

The General Plan includes a series of policies to address changes in vehicle LOS resulting from buildout. Proposed policies include roadway and intersection improvements as well as strategies to reduce congestion, particularly on local roads, through the layered network, transportation demand management, and promoting the use of alternative transportation modes. The General Plan's land use strategy serves to minimize vehicular traffic by promoting walking, bicycling, and transit use. The General Plan also establishes policies that strengthen and expand the non-motorized transportation system and would not conflict with any established plans, ordinances, or policies establishing measures of effectiveness for these forms of circulation. No mitigation is available beyond the implementation of General Plan Action 5-A.38. Although these policies require the City to coordinate with adjacent jurisdictions to implement the improvements, the ultimate decision to implement the improvements resides with another jurisdiction. Since the City cannot guarantee that the needed improvements will be implemented, the 2035 General Plan EIR determined that impacts would be significant and unavoidable.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035

General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to a program, plan, ordinance, or policy addressing the circulation system compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Significant and Unavoidable.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?[1]

As stated in 2035 General Plan EIR, the six CMP intersections and 14 CMP roadway segments within the Planning Area, implementation of the Project would not degrade existing levels of service below acceptable levels or further degrade existing unacceptable level of service, if all General Plan improvements would be implemented. However, as with the intersection and roadway segment analysis, some improvements that are part of the General Plan, and which are assumed in the roadway analysis, are partially or fully within the control of other jurisdictions and thus cannot be guaranteed by the City of Redlands. Without the proposed improvements, the LOS would worsen at a roadway segment already operating at LOS F, resulting in a potentially significant and unavoidable impact.

Although this policy requires the City of Redlands to coordinate with San Bernardino County to implement the improvement, the ultimate decision to implement the improvements resides with another jurisdiction. Since the City cannot guarantee that the needed improvements will be implemented, the 2035 General Plan EIR determined that this impact would be significant and unavoidable.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to service standards and travel demand measures compared to the 2035 General Plan EIR.

---

[1] The revised project is not required to analyze vehicle miles traveled (VMT) since it was circulated for public review prior to adoption of VMT as the means for analyzing transportation impacts. "If an environmental document has not yet been sent out for public review before July 1, 2020, the agency's environmental document must use VMT for analyzing transportation impacts using VMT as of July 1. (See CEQA Guidelines, § 15007(c) ["If a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved."].)

Since circulation of an addendum is not required in accordance with CEQA Guidelines Section 15164, and LOS was the primary method for analyzing transportation impacts when the previously certified EIR was circulated for public review, an analysis of VMT for the revised project is not required under CEQA.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Significant and Unavoidable.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The 2035 General Plan EIR states that the General Plan provides for safety and compatibility in the transportation network. Proposed policies ensure that the design of roadway facilities considers the needs of users of all modes to promote safe street designs that are appropriate for adjacent land uses. The layered network approach in the General Plan is intended to reduce conflicts from incompatible modes while incorporating facilities that can safely accommodate a range of users. For example, the General Plan seeks to use the layered network to identify routes that are more appropriate for goods movement, which would allow truck traffic to avoid local roads and residential neighborhoods. The roadway classification system in the General Plan supports this by requiring up-to-date design standards tailored for the users and conditions likely for each classification. Thus, transportation policies in the General Plan would reduce design hazards and conflicts between incompatible land uses and between all transportation network users. Impacts were determined to be less than significant in this regard.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to geometric design features and incompatible uses within the transportation system compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Result in inadequate emergency access?

According to the 2035 General Plan EIR, emergency vehicles take the fastest and most expedient routes to access an emergency. In the event of an evacuation, the primary routes include, if available: Redlands Boulevard, Fern Avenue, Terracina Boulevard, and Barton Road. The General Plan includes policies and actions aimed at ensuring that adequate emergency access is provided for existing and future development. The 2035 General Plan EIR determined that implementation of current State and federal regulations, combined with General Plan policies and actions, would reduce the potential impacts on study intersection and roadway segments along emergency access routes in the Planning Area to a less than significant level.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose

rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to emergency access compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.18 TRIBAL CULTURAL RESOURCES

This section corresponds with 2035 General Plan EIR Section 3.8, *Historical, Archaeological, and Paleontological Resources.*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Based on the 2035 General Plan EIR, there are no known tribal cultural resources in the Planning Area. However, the Planning Area has the potential to contain tribal cultural resources from past Native American activities. Sensitive areas include lands along water sources though there is potential that resources near waterways have been disturbed over time by alluvial processes and flooding and the many rock outcroppings and boulders in upland portions of the Planning Area. Thus, it is possible that future development in the Planning Area could encounter tribal cultural resources. Future development allowed under the General Plan could result in direct or indirect impacts through grading, overland vehicle travel, or other ground-disturbing activities, or through facilitation of access to archaeological sites by the public. The impact of such activities would be considered significant if they were to cause a substantial adverse change to the resources as defined by CEQA Guidelines Section 15064.5. Policies in the General Plan would minimize or avoid potential impacts to any resources not known at this time that may be encountered in future and would promote consultation with local Native American tribal groups during future projects to ensure the protection of tribal cultural resources. Future development projects would also be subject to State and federal law regarding the protection of tribal cultural resources. Thus, impacts concerning tribal cultural resources were considered less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035

General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to tribal cultural resources compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Refer to Response 3.18(a)(i) above.

Certified 2035 General Plan EIR Mitigation Measures: Refer to Mitigation Measures 4.11-a.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.19 UTILITIES AND SERVICE SYSTEMS

This section corresponds with 2035 General Plan EIR Section 3.14, *Public Utilities.*

Would the project:

a) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

As detailed in the 2035 General Plan EIR, the development of future residential, commercial, and industrial land uses in the planning area would be allowed. Additional population and businesses would generate additional demand for water and wastewater services, and therefore, a potential increased demand for water provision and wastewater collection, conveyance, and treatment services over currently established levels. General Plan buildout would allow for the future development of residential uses in Redlands. Additional population and businesses would generate additional demand for water and wastewater services, and therefore, a potential increased demand for water provision and wastewater collection, conveyance, and treatment services over currently established levels. The 2035 EIR determined that at buildout of the General Plan these facilities and services would be adequate to serve the projected buildout, and impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035

General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to regulations pertaining to utilities compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

As detailed in the 2035 General Plan EIR, the City of Redlands projected water supplies for 2035 of 64,098 af from existing sources and entitlements. The City of Redlands has identified adequate supply from existing water sources and entitlements to meet demand through 2035. The 2015 RUWMP shows that in a normal year, demand for potable and raw water could be met through surface water diversions and groundwater extraction alone. Imported water, which is subject to availability from the SWP, would only account for about 5 percent of the total potential supply. Potable and raw water diversions as projected in the 2015 RUWMP would be in line with projections made for the 2015 IRWMP, which considered each service provider's demands in terms of a regional water budget. The 2015 IWRMP projected that surface water diversions and groundwater extractions from the San Bernardino Basin Area (Bunker Hill Subbasin) by the City of Redlands in 2035 would be 34,549 af for a population of 101,644 people.

The 2015 RUWMP also includes projections showing adequate supply for multiple dry years. In the event of a water shortage, the City of Redlands would rely on its Water Conservation Plan. While a series of dry years would reduce supply, the City has the potential to utilize multiple sources and offset normal supplies with additional groundwater
and conservation efforts without seeking additional entitlements or water sources. Implementation of policies in the General Plan would reduce the overall water usage in the Planning Area by curbing demand for domestic and commercial purposes and promoting water conservation strategies. Proposed policies also seek to ensure the long-term quality and maintenance of surface waters and groundwater supplies, while exploring new options for the capture and utilization of stormwater. As future development under the General Plan has been projected to be accommodated by existing water sources and entitlements, compliance with local and regional water management plans, as well as further compliance with SBx7-7 and implementation of General Plan policies, would reduce the impact to less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to regulations pertaining to water supplies compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As detailed in the 2035 General Plan EIR, implementation of the General Plan would result in future residential and commercial uses in Redlands that could generate additional wastewater. Therefore, wastewater collection, conveyance, and treatment needs would increase over current levels. Additionally, goals and policies in the General Plan aim to conserve water by curbing demand for domestic and commercial purposes, ensure coordinated planning for the provision of public facilities including water infrastructure, and ensure that utilities be designed and constructed to preserve the natural character of an area. Such policies would help to reduce the demand on existing treatment infrastructure and allow for meaningful consideration of potential impacts of any future decisions regarding the provision of new infrastructure.

In addition, current regulations require compliance with water quality standards and would not allow development without adequate utility capacity, including wastewater treatment capacity. Future development projects allowed under the General Plan would be reviewed by the City and the applicable wastewater providers to determine that sufficient capacity exists to serve the development. Therefore, through compliance with State and local regulations, and implementation of the General Plan policies, the 2035 General Plan EIR concluded that impacts would be less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to wastewater compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As stated in the 2035 General Plan EIR, waste collection services are provided by the City of Redlands. Solid waste is primarily disposed of at the California Street Landfill and the San Timoteo Sanitary Landfill. The California Street Landfill has a maximum permitted throughput of 829 tons per day. Its maximum permitted capacity is 10 million cubic yards, of which 4,800,000 cubic yards remain. The San Timoteo Sanitary Landfill has a permitted capacity of 20,400,000 cubic yards and a maximum daily throughput of 2,000 tons. Its remaining capacity is 13,605,388 cubic yards.

Given the City's ability to meet its disposal targets, as well as the remaining capacity in area landfills, meeting the collection, transfer, recycling, and disposal needs of the projected population of the Redlands General Plan would not result in adverse impacts on landfill facilities. It is also likely that changes in regulations will occur that will decrease the need for landfill capacity through new recycling measures. The 2035 General Plan EIR determined that compliance with solid waste regulations and implementation of General Plan policies would reduce impacts to less than significant levels.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to the generation of solid waste compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

As detailed in the 2035 General Plan EIR, City of Redlands Municipal Code establishes requirements for recycling to facilitate compliance with State recycling mandates. It establishes mandates related to solid waste, including access points for solid waste and recycling collection vehicles, as well as capacity requirements for waste generation of buildings. Development of future land uses, as designated in the General Plan, would be required to comply with federal, State, and local statutes and regulations related to solid waste.

As described above, waste collection services are provided by the City of Redlands for areas within city limits. The Redlands Quality of Life Department provides residential waste collection, green waste collection for yard waste, and curbside recycling. Hazardous and electronic waste is managed by the Redlands Fire Department, which operates a household hazardous and electronic waste disposal site on a weekly basis. Waste collection for the Mentone and Crafton areas is carried out by private haulers contracted with San Bernardino County. Furthermore, policies provided in the General Plan regarding solid waste disposal, recycling, etc., would further ensure compliance with applicable regulations. Therefore, there would be no impact.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to regulations pertaining to solid waste compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.20 WILDFIRE

The previously certified 2035 General Plan EIR did not specifically evaluate wildfire as it was not required in the CEQA Guidelines at the time the 2035 General Plan EIR was prepared. Nonetheless, this section corresponds with 2035 General Plan EIR Section 3.7, *Hazard and Hazardous Materials*. The project's impacts, as currently proposed, are discussed below.

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Based on the 2035 General Plan EIR, the City's relevant emergency response or emergency evacuation plans include the San Bernardino County Emergency Operations Plan and, to the extent that they mitigate potential disasters in the Planning Area, the Redlands HMP and the San Bernardino County MJHMP. Physical development under the project, including new roadways, land uses, and increased densities, could create obstacles to the implementation of emergency response or evacuation plans adopted for the Planning Area. However, policies in the General Plan would eliminate or reduce these impacts by seeking to utilize the Redlands HMP, which is consistent with the MJHMP, as a guide for emergency planning, thus considering the area's hazards and promoting means to reduce local risks, as well as to improve emergency access, ingress, and egress, emergency preparedness, and inter-jurisdictional cooperation throughout the Planning Area. Thus, the impact is less than significant.

The project proposes updates to the City's Housing Element that are primarily limited to background information updates and policy updates in accordance with State law. The project does not propose rezoning; rather, it identifies future candidate sites that would be rezoned within three years of Housing Element adoption. Future rezoning activities necessary to fulfill the City's RHNA would be subject to City review and approval and would be analyzed in accordance with CEQA requirements. As a result, none of the components of the project present a new use or intensify a use that was considered under the 2035 General Plan EIR. Therefore, the project would not result in new or substantially more severe environmental impacts pertaining to an adopted emergency response plan or emergency evacuation plan compared to the 2035 General Plan EIR.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Refer to Response 3.20(a).

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Refer to Response 3.20(a).

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Refer to Response 3.20(a).

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Based on this Addendum, the project has not substantially changed in regard to the setting, design, impacts, and mitigation measures as described in the 2035 General Plan EIR. New circumstances or new information, including any new or revised environmental laws, regulations, or policies have not modified the impacts of the project.

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The project would not result in impacts beyond those identified in the 2035 General Plan EIR in this regard and does not have the potential to degrade the environment, reduce the habitat of a fish or wildlife species, threaten plant or animal communities, reduce or restrict endangered plant or animal species or eliminate important examples of major periods of California history or prehistory with compliance with the 2035 General Plan EIR mitigation measures.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Given the nature and scope of the project, and in consideration of mitigation measures that are included in the 2035 General Plan EIR, the project would not involve impacts that are cumulatively considerable.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Construction-related activities are anticipated to have some relatively minor, temporary impacts which can be mitigated with implementation of measures included in the 2035 General Plan EIR. Furthermore, potential long-term (operational) impacts would be reduced to less than significant levels through implementation of required 2035 General Plan EIR mitigation measures. Thus, the project would not involve environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Certified 2035 General Plan EIR Mitigation Measures: No mitigation measures were required in the 2035 General Plan EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

4.0 REFERENCES

The following references were utilized for the preparation of this Addendum:

City of Redlands. 2017. City of Redlands General Plan 2035.

City of Redlands. 2017. *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report*.

City of Redlands. Redlands Municipal Code. Continuously updated.

RESOLUTION NO. 8292

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS APPROVING GENERAL PLAN AMENDMENT NO. 0144 FOR THE ADOPTION OF THE 6TH CYCLE 2021-2029 HOUSING ELEMENT UPDATE AND APPROVING THE ADDENDUM TO THE CERTIFIED ENVIRONMENTAL IMPACT REPORT FOR THE 2035 GENERAL PLAN AND CLIMATE ACTION PLAN.

WHEREAS, Government Code section 65580et seq. requires cities to prepare a Housing Element as a component of each city's General Plan and to revise it regularly on a schedule set forth by law; and

WHEREAS, the City of Redlands initiated an update to the Housing Element of the General Plan and prepared proposed revisions to the Housing Element for the 2021-2029 planning period ("6th Cycle 2021-2029 Housing Element"), which replaces the Housing Element that covered the period 2013 to 2021; and

WHEREAS, the 6th Cycle 2021-2029 Housing Element sets forth the housing policies for the City, will facilitate the preservation and development of housing, and will establish programs to accommodate the City's share of the regional housing need in Southern California; and

WHEREAS, the 6th Cycle 2021-2029 Housing Element complies with the requirements of State law; and

WHEREAS, in accordance with Government Code section 65583, the City finds that the proposed 6th Cycle 2021-2029 Housing Element complies with the duty to Affirmatively Further Fair Housing; and

WHEREAS, the City has been allocated 3,516 new housing units as its share of the Regional Housing Needs Assessment ("RHNA") in Southern California; and

WHEREAS, an extensive public outreach effort was conducted to obtain resident and citizen input into the Draft 6th Cycle 2021-2029 Housing Element, including a citywide housing needs survey, individual stakeholder interviews, community meetings held on April 26 and May 13, 2021, Planning Commission study sessions held on April 13 and May 25, 2021, as well as a City Council study session held on June 29, 2021; and

WHEREAS, the Draft 6th Cycle 2021-2029 Housing Element was reviewed by the State Department of Housing and Community Development ("HCD") per Government Code section 65585(b), and has been revised to address comments from HCD; and

WHEREAS, on December 30, 2021, the Planning Division caused a public notice display advertisement concerning the Planning Commission public hearing to be published in a newspaper of

general circulation in the City, in accordance with Redlands Municipal Code and applicable Government Code provisions; and

WHEREAS, on January 11, 2022, the Planning Commission held a duly noticed public hearing on the Draft 6th Cycle 2021-2029 Housing Element and the addendum to the 2035 General Plan and Climate Action Plan EIR, and considered the staff's verbal and written reports, and the testimony and any written evidence submitted by the general public; and

WHEREAS, on January 11, 2022, the Planning Commission recommended to the City Council the adoption of the 6th Cycle 2021-2029 Housing Element Update and the related addendum to the 2035 General Plan and Climate Action Plan EIR; and

WHEREAS, on January 20, 2021, the City Clerk caused a public notice display advertisement concerning the City Council public hearing for the 6th Cycle 2021-2029 Housing Element Update to be published in a newspaper of general circulation in the City, in accordance within the Redlands Municipal Code and applicable Government Code provisions; and

WHEREAS, on February 1, 2022, the City Council held a duly noticed public hearing on the 6th Cycle 2021-2029 Housing Element Update and the related addendum to the 2035 General Plan and Climate Action Plan EIR, and considered the verbal and written staff reports, and the testimony and any written evidence submitted by the general public;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

1. California Environmental Quality Act. An addendum to the City of Redlands 2035 General Plan and Climate Action Plan EIR is the appropriate environmental document for the 6th Cycle 2021-2029 Housing Element Update. The 6th Cycle 2021-2029 Housing Element Update will necessitate future amendments to the General Plan Land Use Map as well as the Safety Element. However, the amendments will occur in the future and are not included as part of the scope of this project. Therefore, in accordance with section 15164(a) of the State Guidelines implementing CEQA, none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred, and an addendum to the 2035 General Plan and Climate Action Plan EIR has been prepared for the 6th Cycle 2021-2029 Housing Element Update.

2. Adoption of the 6th Cycle 2021-2029 Housing Element. The City Council herby adopts the 6th Cycle 2021-2029 Housing Element Update and the related addendum to the City of Redlands 2035 General Plan and Climate Action Plan EIR.

3. Effective Date. This Resolution shall become effective upon adoption.

ADOPTED, SIGNED AND APPROVED this 1st day of February, 2022.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson,
City Clerk

I, Jeanne Donaldson, City Clerk of the City of Redlands, do hereby certify that the foregoing Resolution was duly adopted by the City Council at a regular meeting thereof held on the 1st day of February, 2022, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

"A City That Works"

City Council/Successor Agency Meeting **L. 1.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of a letter of support for the University of Redlands' State budget request for University Village - A Model Transit-Integrated Neighborhood in Redlands, CA (City Manager Duggan)

MOTION:

If the City Council concurs with staff's recommendation, the following motion is provided.

I move to authorize the issuance of a letter in support of the University of Redlands' State budget request for University Village - A Model Transit-Integrated Neighborhood in Redlands, CA.

RECOMMENDATION:

It is recommended that the City Council authorize the issuance of a letter in support of the University of Redlands' State budget request for University Village - A Model Transit-Integrated Neighborhood in Redlands, CA.

DISCUSSION:

The University of Redlands is currently seeking an $18 million state budget allocation for University Village -- a 30-acre transit-oriented, multi-use, mixed-income, sustainable community adjacent to the terminus station of the MetroLink commuter train system. The City recognizes that University Village will be an important economic driver for the City of Redlands while creating a model neighborhood of the future that is self-contained and socio-economically diverse. In consideration of this, staff is seeking City Council authority to issue a letter in support of the University of Redlands' State budget request for its University Village project.

SUBMITTED BY:
Charles M. Duggan, Jr., City Manager

Attachments

Letter of Support-University of Redlands

PAUL T. BARICH
Mayor

City of
REDLANDS
Incorporated 1888
35 Cajon Street, Redlands, CA 92373
909-798-7533
pbarich@cityofredlands.org

EDDIE TEJEDA
Mayor Pro Tem

DENISE DAVIS
Council Member

JENNA GUZMAN-LOWERY
Council Member

MICK GALLAGHER
Council Member

February 1, 2022

The Honorable James Ramos
California State Capitol
P.O. Box 942849
Sacramento, CA 94249-0040

Re: University of Redlands State Budget Request for University Village – a Model Transit-Integrated Neighborhood in Redlands, CA

Dear Assemblymember Ramos:

The City of Redlands wholeheartedly supports the University of Redlands' request for an $18 million state budget allocation for University Village – a 30-acre transit-oriented, multi-use, mixed-income, sustainable community adjacent to the terminus station of the MetroLink commuter train system.

University Village will be an important economic driver for the City of Redlands. It will uplift our underserved population through an at-risk youth employment program, a commitment to local hiring goals, and construction contracts to be awarded to priority businesses including MBE and WBE.

While creating a model neighborhood of the future that is self-contained and socio-economically-diverse, University Village will also contribute new affordable housing that is greatly needed in our city.

We urge you to support this funding request for Fiscal Year 2022 that will benefit the entire City of Redlands.

Sincerely,

Paul T. Barich
Mayor
City of Redlands

Cc: City Council
Charles M. Duggan, Jr., City Manager

"A City That Works"

City Council/Successor Agency Meeting **L. 2.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of a five-year lease agreement with Lenslock Inc. for body worn cameras in the amount of $478,065 (Police Chief Catren)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to approve the five-year lease agreement with LensLock Inc. for body worn cameras in the amount of $478,065.

RECOMMENDATION:

Staff recommends that Council approve the acceptance of the five-year lease agreement with Lenslock Inc. for body worn cameras in the amount of $478,065.00.

DISCUSSION:

Body-worn cameras (BWC) provide officers with a reliable and compact tool to systematically and automatically record their field observations and encounters. They can be used to document interactions with victims, witnesses, and others during police-public encounters; arrests; and critical incidents. The Redlands City Council approved funding for body worn cameras for police department personnel in the FY 21/22 budget. Since then, the department has met with industry leaders and obtained three competitive quotes to implement a body worn camera program.

After examining the products and services of multiple BWC providers, staff identified LensLock of Poway, California as the best suited to its needs. LensLock provides BWC services to law enforcement agencies in California, Nevada, Colorado, Utah, and Georgia. Founded in 2016 and led by technology innovators, LensLock has demonstrated that their products meet the goals and

objectives that the Redlands Police Department has identified for its BWC system. Specifically, LensLock is the only company that provides a free, unlimited redaction service and integration with the department's existing CAD/RMS. This service is the reason we seek procurement by sole source purchase pursuant to RMC 2.16.010. The proposal is to acquire 102 BWC units for our field personnel. The acquisition includes the supporting hardware, software, implementation, training, unlimited data plan, and software and database maintenance during the five-year service plan.

ALTERNATIVES:

Do not accept the five-year lease agreement with LensLock Inc. for body worn cameras in the amount of $478,065.

STRATEGIC PLAN:

Not applicable

SUBMITTED BY:
Christopher R. Catren, Chief of Police

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director
Dana Abramovitz-Daniel, Procurement Manager

PREPARED BY:
Sean Flynn, Sergeant

Fiscal Impact

Fiscal Year:	2021-22
Revenue Generating:	N
Appropriation Required Y/N:	N
Amount:	$95,613.00
Budgeted Y/N:	Y
Account No.:	1012028706
Discussion:	

The first year cost of the BWC system under the five year lease program is $95,613 which is within the established budget for FY 2021/22. Subsequent years will be requested during the budgeting process.

Attachments

LensLock Business Proposal

Sole Source Form

LensLock Lease Agreement

LENSLOCK

Redlands Police Department - CA

LensLock Regional Sales Manager

Sean O'Grady
949-690-6552
SOG@LensLock.com

13125 Danielson St. Suite 112
Poway, CA 92064
U.S.A.

LensLock Inc.
"Securing Trust - One Incident at a Time"
13125 Danielson St., Suite 112
Poway, CA 92064 – U.S.A.
Toll Free – 888-538-0589
www.LensLock.com

Issued: December 7th, 2021
Proposal Valid for 30 days
Proposal Number: #21-555

Services: Body Worn Camera Svc
Payment Terms: KS State Bank
Length of Service: 60 Months
Start Date: **December 28, 2021**

ATTENTION:
Chief Chris Catren
Redlands Police Department
1270 W Park Ave.,
Redlands, CA 92373
Customer ID #21-555

SHIP TO:
Sgt. Sean Flynn

SALES REPRESENTATIVE
Sean O'Grady
Regional Manager
Phone: 949-690-6552
Email: SOG@LensLock.com

Annual Total

QTY	DESCRIPTION	UNIT PRICE	ANNUAL COST
80	Gen 12 Body Worn Camera Service - **UNLIMITED Data Plan**	$1,099.00	$87,920.00
22	Gen 12 Body Worn Camera Service - **UNLIMITED Data Plan**	$1,099.00	included
85	Holster Bluetooth Integration Devices	$199.00	included
60	Bluetooth Integration Technology System	$299.00	included
1	CAD Integration with Spillman	$28,985.00	included
1	Unlimited Outsourced LensLock Redaction		included
1	On-Site Implementation & Training Fee – One-Time Fee	$1,895.00	included
1	Shipping & Handling Fees – One-Time Fee	$1,295.00	included
1	Software & Database Maintenance Fee – Annual Fee	$495.00	included
		SUBTOTAL	$87,920.00
		SALES TAX (8.75%)	$7,693.00
		ANNUAL TOTAL	**$95,613.00**

Thank you SINCERELY for your business!

Important Note: *Please be informed that* ***pricing integrity is very important to our entire company*** *including our Board of Directors, employees, and especially our valued customer base. As such, it is our corporate goal to charge all customers the exact same price of $1,099/BWC/Year through March 31st, 2022.*

LensLock Inc.
"Securing Trust - One Incident at a Time"
13125 Danielson St., Suite 112
Poway, CA 92064 – U.S.A.
Toll Free – 888-538-0589
www.LensLock.com

Issued: December 7th, 2021
Proposal Valid for 30 days
Proposal Number: #21-555

Services: Body Worn Camera Svc
Payment Terms: KS State Bank
Length of Service: 60 Months
Start Date: **December 28, 2021**

ATTENTION:
Chief Chris Catren
Redlands Police Department
1270 W Park Ave.,
Redlands, CA 92373
Customer ID #21-555

SHIP TO:
Sgt. Sean Flynn

SALES REPRESENTATIVE
Sean O'Grady
Regional Manager
Phone: 949-690-6552
Email: SOG@LensLock.com

5 Year Total

QTY	DESCRIPTION	UNIT PRICE	5 YEAR COST
80	Gen 12 Body Worn Camera Service - **UNLIMITED Data Plan**	$1,099.00	$439,600.00
22	Gen 12 Body Worn Camera Service - **UNLIMITED Data Plan**	$1,099.00	included
85	Holster Bluetooth Integration Devices	$199.00	included
60	Bluetooth Integration Technology System	$299.00	included
1	CAD Integration with Spillman	$28,985.00	included
1	Unlimited Outsourced LensLock Redaction		included
1	On-Site Implementation & Training Fee - One-Time Fee	$1,895.00	included
1	Shipping & Handling Fees - One-Time Fee	$1,295.00	included
5	Software & Database Maintenance Fee - Annual Fee	$495.00	included
		SUBTOTAL	$439,600.00
		SALES TAX (8.75%)	$38,465.00
		5Y TOTAL	**$478,065.00**

Thank you SINCERELY for your business!

Important Note: *Please be informed that* ***pricing integrity is very important to our entire company*** *including our Board of Directors, employees, and especially our valued customer base. As such, it is our corporate goal to charge all customers the exact same price of $1,099/BWC/Year March 31st, 2022.*

https://www.lenslock.com/terms-of-use

PAYMENT OPTIONS	
Monthly Payment:	***$7,967.75**
Quarterly Payment:	***$23,903.25**
Annual Payment:	***$95,613.00**

CLIENT: **Redland Police Department, CA**

Chris Catren - Chief

_____

(Name - Title)

_____

(Signature)

_____

(Date)

VENDOR: **LensLock, Inc.**

Andrew Lynch – Vice President of Sales

_____

(Name - Title)

_____

(Signature)

_____

(Date)

Sole Source/ Single Source/ Standardization Form

For procurement of supplies, equipment and services valued at $5,000 and over

NOTE: Every question must be answered with appropriate documentation attached; incomplete forms will be immediately rejected by Purchasing.

Date: 12/20/21

TO: Purchasing Division

FROM: Sgt. Sean Flynn

Purchase Requisition # _____

Estimated Total Cost: $ 478,065.00

Proposed Vendor: LensLock

Request Term: 5 Years

This form must accompany the purchase document whenever an exception to the competitive process is requested. Requests for goods and/or services from a specific vendor or limited to a specific brand, where substitutes to the recommended vendor or brand are unacceptable, must be accompanied by a written justification explaining the circumstances that make alternatives unacceptable.

The City Manager will determine whether the justification is appropriate. Requests for exception must be supported by factual statements that will pass an audit.

INSTRUCTIONS

1. Please check all applicable categories (a. through i.) below and provide additional information where indicated.

☐ a. The requested product is an integral repair part or accessory compatible with existing equipment.

Existing Equipment: _____

Manufacturer/Model Number: _____

Age: _____

Current Estimated Value: _____

☐ b. The requested product has unique design/performance specifications or quality requirements that are not available in comparable products.

☐ c. I have standardized the requested product and the use of another brand/model would require considerable time and funding to evaluate.

☐ d. The requested product is one in which I (and/or my staff) have specialized training and/or extensive expertise. Retraining would incur substantial cost in time and/or funding.

☐ e. The requested product is used or demonstration equipment available at a lower-than-new cost.

☐ f. Repair/Maintenance service is available only from manufacturer or designated service representative.

☐ g. Upgrade to or enhancement of existing software is available only from manufacturer.

☒ h. Service proposed by vendor is unique; therefore, competitive bids are not available or applicable.

☐ i. Other factors (provide detailed explanation in #2 below).

2. Provide a detailed explanation and pertinent documentation *for each category* checked in item 1 above. Attach additional sheets if necessary:

LensLock is the only organization that provides the following services in a single offering.
As part of their service, LensLock creates a mobile application and desktop software application, and unlimited outsourced redaction services uniquely based on specific client needs.
The following features combined make a sole source offering:
- LensLock Video Services: All Inclusive Cameras, mounts, replacements, and unlimited data storage.
- LensLock Cloud Services: Microsoft Azure (Government Cloud) Data Storage

3. Was an evaluation of other equipment, products, or services performed?

☒ Yes ☐ No

***If yes, please explain the type of evaluation performed and provide all supporting documentation*:**

The department solicited competitive bids from two other vendors, but neither was able to provi

4. List below the name of each individual who was involved in the evaluation, if conducted, and in making the recommendation to procure this product or service. Attach additional information, if necessary.

Chief Catren Deputy Chief Reiss Sergeant Flynn

5. Explain what action(s) the department would take if the sole/single source services were no longer available

The department could obtain bids from other companies that provide BWC services, however, none of the other providers offer unlimited cloud storage, CAD/RMS integration and redaction services.

6. I certify that the above information is accurate to the best of my knowledge, and a signed copy of this document will be kept on file and available for audit in my department

Sean Flynn Digitally signed by Sean Flynn DN: cn=Sean Flynn, o, ou=Police, email=sflynn@redlandspolice.org, c=US Date: 2021.12.20 14:58:30 -08'00' 12/20/2021

Prepared by Date

Chris Catren 12/21/2021

Department Director Date

Purchasing Approvals

Purchasing Agent Approval Date

City Manager Approval Date

Rev 1.31.19

DOCUMENTATION INSTRUCTIONS

The instructions listed below should be followed when completing the enclosed documentation. ***Please sign in blue ink and print on single sided paper only.*** Documentation completed improperly will delay funding. If you have any questions regarding the Conditions to Funding, instructions or the documentation, please call us at (877) 587-4054.

I. Attached Documentation

1. **Government Obligation Contract**
   - An authorized individual that is with the Obligor should sign on the first space provided. ***All original signatures are required for funding.***
2. **Exhibit A – Description of Equipment**
   - Review equipment description. Complete serial number/VIN if applicable.
   - List the location where the equipment will be located after delivery/installation.
3. **Exhibit B – Payment Schedule**
   - Sign and print name and title
4. **Exhibit C - Certificate of Acceptance**
   - Sign and print name and title
5. **Exhibit D - Obligor Resolution**
   - Type in the date of the meeting in which the purchase was approved.
   - Print or type the name and title of the individual(s) who is authorized to execute the Contract.
   - The secretary, chairman or other authorized board member of the Obligor must sign the Resolution where indicated.
   - A second authorized individual that is with the Obligor should attest the Resolution where indicated.
6. **Exhibit E - Bank Qualified Certificate**
   - Sign and print name and title
7. **Insurance Requirements**
   - Complete insurance company contact information where indicated.
8. **Debit Authorization – (Preferred)**
   - Complete form and attach a voided check
9. **8038G IRS Form**
   - Please read 8038 Review Form
   - In Box 2, type Employer Identification Number
   - Sign and print name and title

II. Additional Documentation Required

1. First payment check as stated on attached invoice
2. Insurance certificate as stated on the Insurance Requirements Form
3. Vendor Invoice for the amount to finance listing applicable SN/VIN, down payment, trade, etc.
4. Signed and completed Credit Application

III. Condition to Funding

If, for any reason: (i) the required documentation is not returned by April 7, 2022, is incomplete, or has unresolved issues relating thereto, or (ii) on, or prior to the return of the documentation, there is a change of circumstance, including but not limited to changes in the federal corporate income tax rate or reducing/capping the tax-exempt interest benefit, which adversely affects the expectations, rights or security of the Obligee or its assignees; then Obligee or its assignees reserve the right to withdraw/void its offer to fund this transaction in its entirety. *Neither KS StateBank nor Baystone Government Finance is acting as an advisor to the municipal entity/obligated person and neither owes a fiduciary duty pursuant to Section 15B of the Exchange Act of 1934.*

All documentation should be returned to:

KS StateBank
2627 KFB Plaza, Suite 202E
Manhattan, Kansas 66503

GOVERNMENT OBLIGATION CONTRACT

Obligor
City of Redlands, California
35 Cajon Street
Redlands, California 92373

Obligee
KS StateBank
1010 Westloop, P.O. Box 69
Manhattan, KS 66505-0069

Dated as of December 31, 2021

This Government Obligation Contract dated as of the date listed above is between Obligee and Obligor listed directly above. Obligee desires to finance the purchase of the Equipment described in Exhibit A to Obligor and Obligor desires to have Obligee finance the purchase of the Equipment subject to the terms and conditions of this Contract which are set forth below.

I. Definitions

Section 1.01 Definitions. The following terms will have the meanings indicated below unless the context clearly requires otherwise:
"Additional Schedule" refers to the proper execution of additional schedules to Exhibit A and Exhibit B, as well as other exhibits or documents that may be required by the Obligee all of which relate to the financing of additional Equipment.
"Budget Year" means the Obligor's fiscal year.
"Commencement Date" is the date when Obligor's obligation to pay Contract Payments begins.
"Contract" means this Government Obligation Contract and all Exhibits attached hereto, all addenda, modifications, schedules, refinancings, guarantees and all documents relied upon by Obligee prior to execution of this Contract.
"Contract Payments" means the payments Obligor is required to make under this Contract as set forth on Exhibit B.
"Contract Term" means the Original Term and all Renewal Terms.
"Exhibit" includes the Exhibits attached hereto, and any "Additional Schedule", whether now existing or subsequently created.
"Equipment" means all of the items of Equipment listed on Exhibit A and any Additional Schedule, whether now existing or subsequently created, and all replacements, restorations, modifications and improvements.
"Government" as used in the title hereof means a State or a political subdivision of the State within the meaning of Section 103(a) of the Internal Revenue Code of 1986, as amended ("Code"), or a constituted authority or district authorized to issue obligations on behalf of the State or political subdivision of the State within the meaning of Treasury Regulation 1.103-1(b), or a qualified volunteer fire company within the meaning of section 150(e)(1) of the Code.
"Obligee" means the entity originally listed above as Obligee or any of its assignees.
"Obligor" means the entity listed above as Obligor and which is financing the Equipment through Obligee under the provisions of this Contract.
"Original Term" means the period from the Commencement Date until the end of the Budget Year of Obligor.
"Renewal Term" means the annual term which begins at the end of the Original Term and which is simultaneous with Obligor's Budget Year and each succeeding Budget Year for the number of Budget Years necessary to comprise the Contract Term.
"State" means the state which Obligor is located.

II. Obligor Warranties

Section 2.01 Obligor represents, warrants and covenants as follows for the benefit of Obligee or its assignees:

(a) Obligor is an "issuer of tax exempt obligations" because Obligor is the State or a political subdivision of the State within the meaning of Section 103(a) of the Internal Revenue Code of 1986, as amended, (the "Code") or because Obligor is a constituted authority or district authorized to issue obligations on behalf of the State or political subdivision of the State within the meaning of Treasury Regulation 1.103-1(b), or a qualified volunteer fire company within the meaning of section 150(e)(1) of the Code.
(b) Obligor has complied with any requirement for a referendum and/or competitive bidding.
(c) Obligor has complied with all statutory laws and regulations that may be applicable to the execution of this Contract; Obligor, and its officer executing this Contract, are authorized under the Constitution and laws of the State to enter into this Contract and have used and followed all proper procedures of its governing body in executing and delivering this Contract. The officer of Obligor executing this Contract has the authority to execute and deliver this Contract. This Contract constitutes a legal, valid, binding and enforceable obligation of the Obligor in accordance with its terms.
(d) Obligor shall use the Equipment only for essential, traditional government purposes.
(e) Should the IRS disallow the tax-exempt status of the interest portion of the Contract Payments as a result of the failure of the Obligor to use the Equipment for governmental purposes, or should the Obligor cease to be an issuer of tax exempt obligations, or should the obligation of Obligor created under this Contract cease to be a tax exempt obligation for any reason, then Obligor shall be required to pay additional sums to the Obligee or its assignees so as to bring the after tax yield on this Contract to the same level as the Obligee or its assignees would attain if the transaction continued to be tax-exempt.
(f) Obligor will submit to the Secretary of the Treasury an information reporting statement as required by the Code.
(g) Upon request by Obligee, Obligor will provide Obligee with current financial statements, reports, budgets or other relevant fiscal information.
(h) Obligor shall retain the Equipment free of any hazardous substances as defined in the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 et. seq. as amended and supplemented.
(i) Obligor hereby warrants the General Fund of the Obligor is the primary source of funds or a backup source of funds from which the Contract Payments will be made.
(j) Obligor presently intends to continue this Contract for the Original Term and all Renewal Terms as set forth on Exhibit B hereto. The official of Obligor responsible for budget preparation will include in the budget request for each Budget Year the Contract Payments to become due in such Budget Year, and will use all reasonable and lawful means available to secure the appropriation of money for such Budget Year sufficient to pay the Contract Payments coming due therein. Obligor reasonably believes that moneys can and will lawfully be appropriated and made available for this purpose.
(k) Obligor has selected both the Equipment and the vendor(s) from whom the Equipment is to be purchased upon its own judgment and without reliance on any manufacturer, merchant, vendor or distributor, or agent thereof, of such equipment to the public.
(l) Obligor owns the Equipment and any additional collateral free and clear of any liens, and Obligor has not and will not, during the Contract Term, create, permit, incur or assume any levies, liens or encumbrances of any kind with respect to the Equipment or any additional collateral except those created by this Contract.
(m) Obligor warrants, as applicable, the purchase of any telecommunications and video surveillance services or equipment financed hereunder complies with 2 CFR § 200.216 and 2 CFR § 200.471.
(n) Obligor finds and determines that the amount of the Contract Payments set forth in Exhibit B are equal to the fair rental value of the related Equipment during the respective Budget Year of Obligor in which such Contract Payments are made.
(o) The Equipment will have a useful life that is substantially in excess of the Contract Term.

Section 2.02 Escrow Agreement. In the event both Obligee and Obligor mutually agree to utilize an Escrow Account, then immediately following the execution and delivery of this Contract, Obligee and Obligor agree to execute and deliver and to cause Escrow Agent to execute and deliver the Escrow Agreement. This Contract shall take effect only upon execution and delivery of the Escrow Agreement by the parties thereto. Obligee shall deposit or cause to be deposited with the Escrow Agent for credit to the Equipment Acquisition Fund the sum of N/A, which shall be held, invested and disbursed in accordance with the Escrow Agreement.

III. Acquisition of Equipment, Contract Payments and the Purchase Option Price

Section 3.01 Acquisition and Acceptance. Obligor shall be solely responsible for the ordering of the Equipment and for the delivery and installation of the Equipment. Execution of the Certificate of Acceptance or, alternatively, Payment Request and Equipment Acceptance Form, by a duly authorized representative of Obligor, shall constitute acceptance of the Equipment on behalf of the Obligor.

Section 3.02 Contract Payments. Obligor shall pay Contract Payments exclusively to Obligee or its assignees in lawful, legally available money of the United States of America. The Contract Payments shall be sent to the location specified by the Obligee or its assignees. The Contract Payments, payable without notice or demand, are due as set forth on Exhibit B. Obligee shall have the option to charge interest at the highest lawful rate on any Contract Payment received later than the due date for the number of days that the Contract Payment(s) were late, plus any additional accrual on the outstanding balance for the number of days that the Contract Payment(s) were late. Obligee shall also have the option, on monthly payments only, to charge a late

fee of up to 10% of the monthly Contract Payment that is past due. Furthermore, Obligor agrees to pay any fees associated with the use of a payment system other than check, wire transfer, or ACH. Once all amounts due Obligee hereunder have been received, Obligee will release any and all of its rights, title and interest in the Equipment.

Section 3.03 Abatement. During any period in which, by reason of material damage or destruction or taking under the power of eminent domain (or sale to any entity threatening the use of such power) or material title defect with respect to the Equipment, there is substantial interference with the use and possession by Obligor of the Equipment, the Contract Payments due under the Contract with respect to the Equipment shall be abated proportionately in whole or in part. Obligor shall immediately notify Obligee upon the occurrence of any event causing substantial interference with Obligor's use and possession of the Equipment and such notice shall be provided prior to the abatement of any Contract Payments. The amount of abatement shall be such that the remaining rental obligation represents fair consideration for Obligor's use and possession of the Equipment, or portions thereof, not substantially interfered with, and end on the earlier of the date on which the use and possession of the Equipment is restored to Obligor or the date on which Obligor uses the Net Proceeds of insurance or a condemnation awards to pay the Contract Payments or the applicable Purchase Option Price. In the event of any such interference, this Contract and the related abatement agreement shall continue in full force and effect. To the extent allowed by law, Obligor waives the benefits of Civil Code Section 1932 and any and all other rights to terminate this Contract and the related Abatement agreement by virtue of any interference with the use and possession of any Equipment, although such waiver shall not constitute a waiver of abatement of Contract Payments, as set forth in this section.

Section 3.04 Contract Payments Unconditional. Except as provided in Section 3.03, the obligation of Obligor to make Contract Payments or any other payments required hereunder shall be absolute and unconditional in all events. NOTWITHSTANDING ANY DISPUTE BETWEEN OBLIGOR AND OBLIGEE OR BETWEEN OBLIGOR AND VENDOR OR ANY OTHER PERSON, OBLIGOR SHALL MAKE ALL CONTRACT PAYMENTS AND OTHER PAYMENTS REQUIRED HEREUNDER WHEN DUE AND SHALL NOT WITHHOLD ANY CONTRACT PAYMENT OR OTHER PAYMENT PENDING FINAL RESOLUTION OF SUCH DISPUTE NOR SHALL OBLIGOR ASSERT ANY RIGHT OF SET-OFF OR COUNTERCLAIM AGAINST ITS OBLIGATION TO MAKE CONTRACT PAYMENTS OR OTHER PAYMENTS REQUIRED HEREUNDER. Obligor's obligation to make Contract Payments or other payments shall not be abated on account of failure of the Equipment to perform as desired or obsolescence of the Equipment and shall not be abated through accident or unforeseen circumstances except as provided in Section 3.03.

Section 3.05 Purchase Option Price. Upon thirty (30) days written notice, Obligor shall have the option to pay, in addition to the Contract Payment, the corresponding Purchase Option Price which is listed on the same line on Exhibit B. This option is only available to the Obligor on the Contract Payment date and no partial prepayments are allowed. If Obligor chooses this option and pays the Purchase Option Price to Obligee then Obligee will transfer any and all of its rights, title and interest in the Equipment to Obligor.

Section 3.06 Contract Term. The Contract Term shall be the Original Term and all Renewal Terms until all the Contract Payments are paid as set forth on Exhibit B except as provided under Section 9.01 below.

Section 3.07 Disclaimer of Warranties. OBLIGEE MAKES NO WARRANTY OR REPRESENTATION, EITHER EXPRESS OR IMPLIED, AS TO THE VALUE, DESIGN, CONDITION, MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE OR ANY OTHER WARRANTY WITH RESPECT TO THE EQUIPMENT. OBLIGEE IS NOT A MANUFACTURER, SELLER, VENDOR OR DISTRIBUTOR, OR AGENT THEREOF, OF SUCH EQUIPMENT; NOR IS OBLIGEE A MERCHANT OR IN THE BUSINESS OF DISTRIBUTING SUCH EQUIPMENT TO THE PUBLIC. OBLIGEE SHALL NOT BE LIABLE FOR ANY INCIDENTAL, INDIRECT, SPECIAL OR CONSEQUENTIAL DAMAGE ARISING OUT OF THE INSTALLATION, OPERATION, POSSESSION, STORAGE OR USE OF THE EQUIPMENT BY OBLIGOR.

IV. Appropriation of Money

Section 4.01 Appropriation. The person or entity in charge of preparing Obligor's budget will include in the budget request for each Budget Year the Contract Payments to become due in such Budget Year with respect to the Contract, and will use all reasonable and lawful means available to secure the appropriation of money for such Budget Year sufficient to pay all such Contract Payments coming due therein. The covenants on the part of Obligor contained in this Contract, including the covenant to budget and appropriate amounts necessary to make Contract Payments, shall be deemed to be duties imposed by law, and it shall be the duty of each and every public official of Obligor to take such action and do such things as required by law in the performance of the official duty of such officials to enable Obligor to carry out and perform the covenants and contracts in this Contract. This Contract and each abatement agreement represent a firm contract and not a non-appropriation contract.

V. Insurance, Damage, Insufficiency of Proceeds

Section 5.01 Insurance. Obligor shall maintain both casualty insurance, liability insurance and rental interruption and loss of use and occupancy insurance at its own expense with respect to the Equipment. Obligor shall be solely responsible for selecting the insurer(s) and for making all premium payments and ensuring that all policies are continuously kept in effect during the period when Obligor is required to make Contract Payments. Obligor shall provide Obligee with a Certificate of Insurance which lists the Obligee and/or assigns as a loss payee and an additional insured on the policies with respect to the Equipment.

(a) Obligor shall insure the Equipment against any loss or damage by fire and all other risks covered by the standard extended coverage endorsement then in use in the State and any other risks reasonably required by Obligee in an amount at least equal to the then applicable Purchase Option Price of the Equipment. Alternatively, Obligor may insure the Equipment under a blanket insurance policy or policies.

(b) The liability insurance shall insure Obligee from liability and property damage in any form and amount satisfactory to Obligee.

(c) Obligor shall maintain or cause to be maintained at its expense throughout the Contract, rental interruption insurance against loss of use of the Equipment or portions thereof with coverage equal to the maximum total Contract Payments payable under the Contract by Obligor for any consecutive 24-month period. The policy shall insure against abatement of Contract Payments payable by Obligor resulting from Obligor's loss of use of the Equipment or any substantial portion thereof and caused by any and all perils, either insured or uninsured, including acts of God. The Net Proceeds of such insurance shall be payable to Obligee in amounts proportionate to Obligor's loss of use of the Equipment and the corresponding rental abatement, if any, and shall supplement Contract Payments made by Obligor, if any, during the period in which Obligor's use and occupancy of the Equipment is being restored in sufficient amounts to make Obligee whole.

(d) Obligor may self-insure against the casualty risks and liability risks described above. If Obligor chooses this option, Obligor must furnish Obligee with a certificate and/or other documents which evidences such coverage.

(e) All insurance policies issued or affected by this Section shall be so written or endorsed such that the Obligee and its assignees are named additional insureds and loss payees and that all losses are payable to Obligor and Obligee or its assignees as their interests may appear. Each policy issued or affected by this Section shall contain a provision that the insurance company shall not cancel or materially modify the policy without first giving thirty (30) days advance notice to Obligee or its assignees. Obligor shall furnish to Obligee certificates evidencing such coverage throughout the Contract Term.

Section 5.02 Damage to or Destruction of Equipment. Obligor assumes the risk of loss or damage to the Equipment. If the Equipment or any portion thereof is lost, stolen, damaged, or destroyed by fire or other casualty, Obligor will immediately report all such losses to all possible insurers and take the proper procedures to obtain all insurance proceeds. At the option of Obligee, Obligor shall either (1) apply the Net Proceeds to replace, repair or restore the Equipment or (2) apply the Net Proceeds to the applicable Purchase Option Price. For purposes of this Section and Section 5.03, the term Net Proceeds shall mean the amount of insurance proceeds collected from all applicable insurance policies after deducting all expenses incurred in the collection thereof.

Section 5.03 Insufficiency of Net Proceeds. If there are no Net Proceeds for whatever reason or if the Net Proceeds are insufficient to pay in full the cost of any replacement, repair, restoration, modification or improvement of the Equipment, then Obligor shall, at the option of Obligee, either (1) complete such replacement, repair, restoration, modification or improvement and pay any costs thereof in excess of the amount of the Net Proceeds or (2) apply the Net Proceeds to the Purchase Option Price and pay the deficiency, if any, to the Obligee.

Section 5.04 Obligor Negligence. Obligor assumes all risks and liabilities, whether or not covered by insurance, for loss or damage to the Equipment and for injury to or death of any person or damage to any property whether such injury or death be with respect to agents or employees of Obligor or of third parties, and whether such property damage be to Obligor's property or the property of others (including, without limitation, liabilities for loss or damage related to the release or threatened release of hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act, the Resource Conservation and Recovery Act or similar or successor law or any State or local equivalent now existing or hereinafter enacted which in any manner arise out of or are incident to any possession, use, operation, condition or storage of any Equipment by Obligor), which is proximately caused by the negligent conduct of Obligor, its officers, employees and agents.

Section 5.05 Reimbursement. Obligor hereby assumes responsibility for and agrees to reimburse Obligee for all liabilities, obligations, losses, damages, penalties, claims, actions, costs and expenses (including reasonable attorneys' fees) of whatsoever kind and nature, imposed on, incurred by or asserted against Obligee that in any way relate to or arise out of a claim, suit or proceeding, based in whole or in part upon the negligent conduct of Obligor, its officers, employees and agents, or arose out of installation, operation, possession, storage or use of any item of the Equipment, to the maximum extent permitted by law.

VI. Title and Security Interest

Section 6.01 Title. Title to the Equipment shall vest in Obligor when Obligor acquires and accepts the Equipment. Title to the Equipment will automatically transfer to the Obligee in the event Obligor defaults under Section 9.01. In such event, Obligor shall execute and deliver to Obligee such documents as Obligee may request to evidence the passage of legal title to the Equipment to Obligee.

Section 6.02 Security Interest. To secure the payment of all Obligor's obligations under this Contract, as well as all other obligations, debts and liabilities, plus interest thereon, whether now existing or subsequently created, Obligor hereby grants to Obligee a security interest under the Uniform Commercial Code constituting a first lien on the Equipment described more fully on Exhibit A. Furthermore, Obligor agrees that any other collateral securing any other obligation(s) to Obligee, whether offered prior to or subsequent hereto, also secures this obligation. The security interest established by this section includes not only all additions, attachments, repairs and replacements to the Equipment but also all proceeds therefrom. Obligor authorizes Obligee to prepare and record any Financing Statement required under the Uniform Commercial Code to perfect the security interest created hereunder. Obligor agrees that any Equipment listed on Exhibit A is and will remain personal property and will not be considered a fixture even if attached to real property.

VII. Assignment

Section 7.01 Assignment by Obligee. All of Obligee's rights, title and/or interest in and to this Contract may be assigned and reassigned in whole or in part to one or more assignees or sub-assignees by Obligee at any time without the consent of Obligor. No such assignment shall be effective as against Obligor until the assignor shall have filed with Obligor written notice of assignment identifying the assignee. Obligor shall pay all Contract Payments due hereunder relating to such Equipment to or at the direction of Obligee or the assignee named in the notice of assignment. Obligor shall keep a complete and accurate record of all such assignments.

Section 7.02 Assignment by Obligor. None of Obligor's right, title and interest under this Contract and in the Equipment may be assigned by Obligor unless Obligee approves of such assignment in writing before such assignment occurs and only after Obligor first obtains an opinion from nationally recognized counsel stating that such assignment will not jeopardize the tax-exempt status of the obligation.

VIII. Maintenance of Equipment

Section 8.01 Equipment. Obligor shall keep the Equipment in good repair and working order, and as required by manufacturer's and warranty specifications. If Equipment consists of copiers, Obligor is required to enter into a copier maintenance/service agreement. Obligee shall have no obligation to inspect, test, service, maintain, repair or make improvements or additions to the Equipment under any circumstances. Obligor will be liable for all damage to the Equipment, other than normal wear and tear, caused by Obligor, its employees or its agents. Obligor shall pay for and obtain all permits, licenses and taxes related to the ownership, installation, operation, possession, storage or use of the Equipment. If any fees are required to be paid by the California Debt & Investment Advisory Commission then such fees shall be paid directly from the Obligor to the California Debt & Investment Advisory Commission. If the Equipment includes any titled vehicle(s), then Obligor is responsible for obtaining such title(s) from the State and also for ensuring that Obligee is listed as First Lienholder on all of the title(s). Obligor shall not use the Equipment to haul, convey or transport hazardous waste as defined in the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et. seq. Obligor agrees that Obligee or its Assignee may execute any additional documents including financing statements, affidavits, notices, and similar instruments, for and on behalf of Obligor which Obligee deems necessary or appropriate to protect Obligee's interest in the Equipment and in this Contract. Obligor shall allow Obligee to examine and inspect the Equipment at all reasonable times.

IX. Default

Section 9.01 Events of Default defined. The following events shall constitute an "Event of Default" under this Contract:

(a) Failure by Obligor to pay any Contract Payment listed on Exhibit B for fifteen (15) days after such payment is due according to the Payment Date listed on Exhibit B, other than by reason of abatement as provided under Section 3.03.

(b) Failure by Obligor to maintain any of the insurances as required under section 5.01.

(c) Failure to pay any other payment required to be paid under this Contract at the time specified herein and a continuation of said failure for a period of fifteen (15) days after written notice by Obligee that such payment must be made. If Obligor continues to fail to pay any payment after such period, then Obligee may, but will not be obligated to, make such payments and charge Obligor for all costs incurred plus interest at the highest lawful rate.

(d) Failure by Obligor to observe and perform any warranty, covenant, condition, promise or duty under this Contract for a period of thirty (30) days after written notice specifying such failure is given to Obligor by Obligee, unless Obligee agrees in writing to an extension of time. Obligee will not unreasonably withhold its consent to an extension of time if corrective action is instituted by Obligor. Subsection (c) does not apply to Contract Payments and other payments discussed above.

(e) Any statement, material omission, representation or warranty made by Obligor in or pursuant to this Contract which proves to be false, incorrect or misleading on the date when made regardless of Obligor's intent and which materially adversely affects the rights or security of Obligee under this Contract.

(f) Any provision of this Contract which ceases to be valid for whatever reason and the loss of such provision would materially adversely affect the rights or security of Obligee.

(g) Obligor admits in writing its inability to pay its obligations.

(h) Obligor defaults on one or more of its other obligations.

(i) Obligor becomes insolvent, is unable to pay its debts as they become due, makes an assignment for the benefit of creditors, applies for or consents to the appointment of a receiver, trustee, conservator, custodian, or liquidator of Obligor, or all or substantially all of its assets, or a petition for relief is filed by Obligor under federal bankruptcy, insolvency or similar laws, or is filed against Obligor and is not dismissed within thirty (30) days thereafter.

Section 9.02 Remedies on Default. Whenever any Event of Default exists, Obligee shall have the right to take one or any combination of the following remedial steps:

(a) Obligee, with or without terminating this Contract, may collect each installment of Contract Payments as it becomes due and payable with respect to the Equipment in accordance with Exhibit B to the end of the Contract Term.

(b) Obligee, with or without terminating this Contract, may repossess any or all of the Equipment by giving Obligor written notice to deliver the Equipment to the location designated by Obligee. In the event Obligor fails to do so within ten (10) days after receipt of such notice, Obligee may enter upon Obligor's premises where the Equipment is kept and take possession of the Equipment and charge Obligor for costs incurred in repossessing the Equipment, including reasonable attorneys' fees. Obligor hereby expressly waives any damages occasioned by such repossession. If the Equipment or any portion of it has been destroyed or damaged beyond repair, Obligor shall pay the applicable Purchase Option Price of the damaged or destroyed Equipment as set forth in the Contract Payment Schedule. Notwithstanding the fact that Obligee has taken possession of the Equipment, Obligor shall continue to be responsible for the Contract Payments with respect thereto as and when such Contract Payments become or would have become due and payable.

(c) If Obligee, in its discretion, takes possession and disposes of the Equipment or any portion thereof, Obligee shall apply the proceeds of any such disposition to pay the following items in the following order: (i) all costs (including, but not limited to, attorneys' fees) incurred in securing possession of the Equipment; (ii) all expenses incurred in completing the disposition; (iii) any sales or transfer taxes; and (iv) the balance of any Contract Payments with respect thereto as and when such Contract Payment would become due and payable. Any disposition proceeds remaining after the requirements of clauses (i), (ii), (iii), (iv) have been met shall be paid to Obligor.

(d) By action pursuant to the California Code of Civil Procedure, or as otherwise provided by law, obtain the issuance of a writ of mandamus enforcing, for the entire balance due, or as it becomes due, under Exhibit B of the Contract, the duty of Obligor to appropriate and take all other administrative steps necessary for the making of all Contract Payments.

(e) Obligee may take any other remedy available at law or in equity with respect to an Event of Default, including (without limitation) those requiring Obligor to perform any of its obligations under this Contract or to pay any moneys due and payable to Obligee, provided Obligee shall have no right to accelerate Contract Payments or otherwise declare any Contract Payments not then in default to be immediately due and payable.

Section 9.03 No Remedy Exclusive. No remedy herein conferred upon or reserved to Obligee is intended to be exclusive and every such remedy shall be cumulative and shall be in addition to every other remedy given under this Contract now or hereafter existing at law or in equity. No delay or omission to exercise any right or power accruing upon any default shall impair any such right or shall be construed to be a waiver thereof.

Section 9.04 Return of Equipment and Storage.

(a) Surrender: The Obligor shall, at its own expense, surrender the Equipment, any additional collateral and all required documentation to evidence transfer of title from Obligor to the Obligee in the event of a default by delivering the Equipment and any additional collateral to the Obligee to a location accessible by common carrier and designated by Obligee. In the case that any of the Equipment and any additional collateral consists of software, Obligor shall destroy all intangible items constituting such software and shall deliver to Obligee all tangible items constituting such software. At Obligee's request, Obligor shall also certify in a form acceptable to Obligee that Obligor has complied with the above software return provisions and that they will immediately cease using the software and that they shall permit Obligee and/or the vendor of the software to inspect Obligor's locations to verify compliance with the terms hereto.

(b) Delivery: The Equipment and any additional collateral shall be delivered to the location designated by the Obligee by a common carrier unless the Obligee agrees in writing that a common carrier is not needed. When the Equipment and any additional collateral is delivered into the custody of a common carrier, the Obligor shall arrange for the shipping of the item and its insurance in transit in accordance with the Obligee's instructions and at the Obligor's sole expense. Obligor at its expense shall completely sever and disconnect the Equipment and any additional collateral or its component parts from the Obligor's property all without liability to the Obligee. Obligor shall pack or crate the Equipment and any additional collateral and all of the component parts of the Equipment and any additional collateral carefully and in accordance with any recommendations of the manufacturer. The Obligor shall deliver to the Obligee the plans, specifications, operation manuals or other warranties and documents furnished by the manufacturer or vendor on the Equipment and any additional collateral and such other documents in the Obligor's possession relating to the maintenance and methods of operation of such Equipment and any additional collateral.

(c) Condition: When the Equipment is surrendered to the Obligee it shall be in the condition and repair required to be maintained under this Contract. It will also meet all legal regulatory conditions necessary for the Obligee to sell or lease it to a third party and be free of all liens. If Obligee reasonably determines that the Equipment or an item of the Equipment, once it is returned, is not in the condition required hereby, Obligee may cause the repair, service, upgrade, modification or overhaul of the Equipment or an item of the Equipment to achieve such condition and upon demand, Obligor shall promptly reimburse Obligee for all amounts reasonably expended in connection with the foregoing.

(d) Storage: Upon written request by the Obligee, the Obligor shall provide free storage for the Equipment and any additional collateral for a period not to exceed 60 days after the expiration of the Contract Term before returning it to the Obligee. The Obligor shall arrange for the insurance described to continue in full force and effect with respect to such item during its storage period and the Obligee shall reimburse the Obligor on demand for the incremental premium cost of providing such insurance.

X. Miscellaneous

Section 10.01 Notices. All notices shall be sufficiently given and shall be deemed given when delivered or mailed by registered mail, postage prepaid, to the parties at their respective places of business as first set forth herein or as the parties shall designate hereafter in writing.

Section 10.02 Binding Effect. Obligor acknowledges this Contract is not binding upon the Obligee or its assignees unless the Conditions to Funding listed on the Documentation Instructions have been met to Obligee's satisfaction, and Obligee has executed the Contract. Thereafter, this Contract shall inure to the benefit of and shall be binding upon Obligee and Obligor and their respective successors and assigns.

Section 10.03 Severability. In the event any provision of this Contract shall be held invalid or unenforceable by any court of competent jurisdiction, such holding shall not invalidate or render unenforceable any other provision hereof.

Section 10.04 Amendments, Addenda, Changes or Modifications. This Contract may be amended, added to, changed or modified by written agreement duly executed by Obligee and Obligor. Furthermore, Obligee reserves the right to directly charge or amortize into the remaining balance due from Obligor, a reasonable fee, to be determined at that time, as compensation to Obligee for the additional administrative expense resulting from such amendment, addenda, change or modification requested by Obligor.

Section 10.05 Execution in Counterparts. This Contract may be simultaneously executed in several counterparts, each of which shall be an original and all of which shall constitute but one and the same instrument.

Section 10.06 Captions. The captions or headings in this Contract do not define, limit or describe the scope or intent of any provisions or sections of this Contract.

Section 10.07 Master Contract. This Contract can be utilized as a Master Contract. This means that the Obligee and the Obligor may agree to the financing of additional Equipment under this Contract at some point in the future by executing one or more Additional Schedules to Exhibit A and Exhibit B, as well as other exhibits or documents that may be required by Obligee. Additional Schedules will be consecutively numbered on each of the exhibits which make up the Additional Schedule and all the terms and conditions of the Contract shall govern each Additional Schedule.

Section 10.08 Entire Writing. This Contract constitutes the entire writing between Obligee and Obligor. No waiver, consent, modification or change of terms of this Contract shall bind either party unless in writing and signed by both parties, and then such waiver, consent, modification or change shall be effective only in the specific instance and for the specific purpose given. There are no understandings, agreements, representations, conditions, or warranties, express or implied, which are not specified herein regarding this Contract, the Equipment or any additional collateral, financed hereunder. Any terms and conditions of any purchase order or other documents submitted by Obligor in connection with this Contract which are in addition to or inconsistent with the terms and conditions of this Contract will not be binding on Obligee and will not apply to this Contract.

Obligee and Obligor have caused this Contract to be executed in their names by their duly authorized representatives listed below.

City of Redlands, California	**KS StateBank**
Signature	Signature
Printed Name and Title	Jaymie Paavola-Luckert, Vice President Printed Name and Title

EXHIBIT A

DESCRIPTION OF EQUIPMENT

RE: Government Obligation Contract dated as of December 31, 2021, between KS StateBank (Obligee) and City of Redlands, California (Obligor)

Below is a detailed description of all the items of Equipment including quantity, model number and serial number where applicable:

One Hundred Two (102) Body Worn Cameras and Assorted Accessories

Physical Address of Equipment after Delivery : _____

EXHIBIT B

PAYMENT SCHEDULE

RE: Government Obligation Contract dated as of December 31, 2021, between KS StateBank (Obligee) and City of Redlands, California (Obligor)

Date of First Payment:	At Closing
Original Balance:	$478,065.00
Total Number of Payments:	Five (5)
Number of Payments Per Year:	One (1)

Pmt No.	Due Date	Contract Payment	Applied to Interest	Applied to Principal	*Purchase Option Price
1	At Closing	$95,613.00	$0.00	$95,613.00	$362,045.42
2	31-Dec-22	$95,613.00	$0.00	$95,613.00	$274,506.03
3	31-Dec-23	$95,613.00	$0.00	$95,613.00	$185,014.51
4	31-Dec-24	$95,613.00	$0.00	$95,613.00	$93,527.33
5	31-Dec-25	$95,613.00	$0.00	$95,613.00	$0.00

By signing below, Obligor acknowledges that its obligation to make the Contract Payments set forth in Exhibit B to the Contract includes repayment of the principal amount of $478,065.00, together with interest at 0.000%.

Furthermore, the amount financed by Obligor is $453,752.41 and such amount is the issue price of this Contract for federal income tax purposes. The difference between the principal amount of this Contract and the issue price is original issue discount, as defined in section 1288 of the Internal Revenue Code of 1986, as amended. The yield of this Contract for federal income tax purposes is 2.680%. Such issue price and yield will be stated in the applicable Form 8038-G.

City of Redlands, California

Signature

Printed Name and Title

*Assumes all Contract Payments due to date are paid

EXHIBIT C

CERTIFICATE OF ACCEPTANCE

RE: Government Obligation Contract dated as of December 31, 2021, between KS StateBank (Obligee) and City of Redlands, California (Obligor)

I, the undersigned, hereby certify that I am a duly qualified representative of Obligor and that I have been given the authority by the Governing Body of Obligor to sign this Certificate of Acceptance with respect to the above referenced Contract. I hereby certify that:

1. The Equipment described on Exhibit A has been delivered and installed in accordance with Obligor's specifications.
2. Obligor has conducted such inspection and/or testing of the Equipment as it deems necessary and appropriate and hereby acknowledges that it accepts the Equipment for all purposes.
3. Obligor has appropriated and/or taken other lawful actions necessary to provide moneys sufficient to pay all Contract Payments required to be paid under the Contract during the current Budget Year of Obligor, and such moneys will be applied in payment of all Contract Payments due and payable during such current Budget Year.
4. Obligor has obtained insurance coverage as required under the Contract from an insurer qualified to do business in the State.
5. No event or condition that constitutes or would constitute an Event of Default exists as of the date hereof.
6. The governing body of Obligor has approved the authorization, execution and delivery of this Contract on its behalf by the authorized representative of Obligor who signed the Contract.
7. Please list the Source of Funds (Fund Item in Budget) for the Contract Payments that come due under Exhibit B of this Contract.

Source of Funds : General Fund

By signing below, Obligor hereby authorizes the General Fund of the Obligor as a backup source of funds from which the Contract Payments can be made.

City of Redlands, California

Signature

Printed Name and Title

EXHIBIT D

OBLIGOR RESOLUTION

RE: Government Obligation Contract dated as of December 31, 2021, between KS StateBank (Obligee) and City of Redlands, California (Obligor)

At a duly called meeting of the Governing Body of the Obligor (as defined in the Contract) held on _____ the following resolution was introduced and adopted:

BE IT RESOLVED by the Governing Body of Obligor as follows:

1. **Determination of Need.** The Governing Body of Obligor has determined that a true and very real need exists for the acquisition of the Equipment described on Exhibit A of the Government Obligation Contract dated as of December 31, 2021, between City of Redlands, California (Obligor) and KS StateBank (Obligee).
2. **Approval and Authorization.** The Governing Body of Obligor has determined that the Contract, substantially in the form presented to this meeting, is in the best interests of the Obligor for the acquisition of such Equipment, and the Governing Body hereby approves the entering into of the Contract by the Obligor and hereby designates and authorizes the following person(s) to execute and deliver the Contract on Obligor's behalf with such changes thereto as such person(s) deem(s) appropriate, and any related documents, including any Escrow Agreement, necessary to the consummation of the transaction contemplated by the Contract.

   Authorized Individual(s): _____
   (Typed or Printed Name and Title of individual(s) authorized to execute the Contract)

3. **Adoption of Resolution.** The signatures below from the designated individuals from the Governing Body of the Obligor evidence the adoption by the Governing Body of this Resolution.

Signature: _____
(Signature of Secretary, Board Chairman or other member of the Governing Body)

Printed Name & Title: _____
(Printed Name and Title of individual who signed directly above)

Attested By: _____
(Signature of one additional person who can witness the passage of this Resolution)

Printed Name & Title: _____
(Printed Name of individual who signed directly above)

EXHIBIT E

BANK QUALIFIED CERTIFICATE

RE: Government Obligation Contract dated as of December 31, 2021, between KS StateBank (Obligee) and City of Redlands, California (Obligor)

Whereas, Obligor hereby represents that it is a "Bank Qualified" Issuer for the calendar year in which this Contract is executed by making the following designations with respect to Section 265 of the Internal Revenue Code of 1986, as amended (the "Code"). (A "Bank Qualified Issuer" is an issuer that issues less than ten million ($10,000,000) dollars of tax-exempt obligations other than "private activity bonds" as defined in Section 141 of the Code, excluding certain "qualified 501(c)(3) bonds" as defined in Section 145 of the Code, during the calendar year).

Now, therefor, Obligor hereby designates this Contract as follows:

1. **Designation as Qualified Tax-Exempt Obligation.** Pursuant to Section 265(b)(3)(B)(i) of the Code, the Obligor hereby specifically designates the Contract as a "qualified tax-exempt obligation" for purposes of Section 265(b)(3) of the Code. In compliance with Section 265(b)(3)(D) of the Code, the Obligor hereby represents that the Obligor will not designate more than $10,000,000 of obligations issued by the Obligor in the calendar year during which the Contract is executed and delivered as such "qualified tax-exempt obligations".
2. **Issuance Limitation.** In compliance with the requirements of Section 265(b)(3)(C) of the Code, the Obligor hereby represents that the Obligor (including all subordinate entities of the Obligor within the meaning of Section 265(b)(3)(E) of the Code) reasonably anticipates not to issue in the calendar year during which the Contract is executed and delivered, obligations bearing interest exempt from federal income taxation under Section 103 of the Code (other than "private activity bonds" as defined in Section 141 of the Code and excluding certain "qualified 501(c)(3) bonds" as defined in Section 145 of the Code) in an amount greater than $10,000,000.

City of Redlands, California

_____
Signature

_____
Printed Name and Title

INSURANCE REQUIREMENTS

Pursuant to Article V of the Government Obligation Contract, you have agreed to provide us evidence of insurance covering the Equipment.

A Certificate of Insurance listing the information stated below should be sent to us no later than the date on which the equipment is delivered.

Insured:	**Certificate Holder:**
City of Redlands, California	KS StateBank
35 Cajon Street	1010 Westloop, P.O. Box 69
Redlands, California 92373	Manhattan, Kansas 66505-0069

1. **Equipment Description**
   - One Hundred Two (102) Body Worn Cameras and Assorted Accessories
   - Please include all applicable VIN's, serial numbers, etc.
2. **Deductible**
   - The deductible amounts on the insurance policy should not exceed $100,000.00.
3. **Physical Damage**
   - All risk coverage to guarantee proceeds of at least $478,065.00.
4. **Loss Payee**
   - KS StateBank AOIA (and/or Its Assigns) MUST be listed as loss payee.
5. **Rental Interruption / Abatement Insurance**
   - As set forth in Section 5.01(c) of the Contract.

Please forward certificate as soon as possible to: Email: dyordy@ksstate.bank
or
Fax: (785) 587-4016

Please complete the information below and return this form along with the Contract.

City of Redlands, California

Insurance Company: _____

Agent's Name: _____

Telephone #: _____

Fax #: _____

Address: _____

City, State Zip: _____

Email: _____

PREFERRED

*As an additional payment option for Obligor, we are now providing the option of ACH (Automatic Clearing House). By completing this form, Obligor is authorizing Obligee to withdraw said payment amount on said date.

DEBIT AUTHORIZATION

I hereby authorize KS StateBank Government Finance Department to initiate debit entries for the Payment Amount (including, but not limited to, any late fees, rate changes, escrow modifications, etc.). I acknowledge that KS StateBank Government Finance Department may reinitiate returned entries up to two additional times, to the account indicated below at the financial institution named below and to debit the same to such account for:

Contract Number	**Payment Amount**	**Frequency of Payments**
3359854	$95,613.00	Annual

Beginning _____ Month _____ Year	**Day of Month** Debits will be made according to Exhibit B of the Contract

I acknowledge that the origination of ACH transactions to this account must comply with the provisions of U.S. law.

Financial Institution Name		**Branch**	
Address	**City**	**State**	**Zip**
Routing Number		**Account Number**	

Type of Account ☐ Checking ☐ Savings

If the account does not have sufficient funds, KS StateBank Government Finance Department may attempt, but shall have no obligation to continue to attempt to deduct the payment from the account. If the account has insufficient funds when KS StateBank Government Finance Department attempts to deduct a payment, KS StateBank Government Finance Department may terminate the automatic deduction of payments upon notice to borrower and me. Until such time as payment is made, borrower shall be responsible to make such payments, and all other payments that may be due to KS StateBank Government Finance Department regarding the above-referenced loan.

This authority is to remain in full force and effect until KS StateBank has received written notification from any authorized signer of the account of its termination in such time and manner as to afford KS StateBank a reasonable opportunity to act on it.

Obligor Name on Contract City of Redlands, California	
Signature	**Printed Name and Title**
Tax ID Number 95-6000766	**Date**

PLEASE ATTACH COPY OF A VOIDED CHECK TO THIS FORM!

USA Patriot Act

USA Patriot Act requires identity verification for all new accounts. This means that we may require information from you to allow us to make a proper identification.

INVOICE

DATE SENT: 12-07-2021

BILL TO:
CITY OF REDLANDS, CALIFORNIA
ATTN: ACCOUNTS PAYABLE
35 CAJON STREET
REDLANDS, CALIFORNIA 92373

REMIT TO:
KS STATEBANK
GOVERNMENT FINANCE DEPARTMENT
PO BOX 69
MANHATTAN, KS 66505-0069
FOR INQUIRIES: (877) 587-4054

ACCOUNT NUMBER	PAYMENT DATE	PAYMENT DUE DATE	TOTAL AMOUNT DUE
3359854	**At Closing**	**At Closing**	**$95,613.00**

DESCRIPTION		AMOUNT
GOVERNMENT OBLIGATION CONTRACT DATED AS OF DECEMBER 31, 2021	PAYMENT AMOUNT:	$95,613.00
ONE HUNDRED TWO (102) BODY WORN CAMERAS AND ASSORTED ACCESSORIES		
Additional interest will be assessed on any payment received after the due date.		
		$95,613.00
		TOTAL DUE

8038 REVIEW FORM

The 8038 form attached hereto is an important part of the documentation package and must be properly filled out and submitted to the Department of the Treasury in order for you to receive the lower tax-exempt rate. Unless you instruct us otherwise, we have engaged a Paid Preparer to assist in the filling out of this form. The Paid Preparer has filled out the relevant portions of this form based on the current understanding of what is required by the Department of the Treasury. The responses on this 8038 form are based on the dates and amounts which you have requested (structure of the transaction) and which are on the Payment Schedule.

1. Please review our responses for accuracy. If anything is inaccurate, please contact our office so that we can make proper revisions.
2. If the information provided to you on this form is accurate, please sign where indicated and return with the document package.
3. If there are any changes to the structure of the transaction that occur prior to funding which require a change to the 8038 form, we will make such changes and provide notification to you.
4. We will return to you a copy of the 8038 form that was mailed to the Department of the Treasury.

Important Note:
The IRS is now requesting information regarding tax-exempt issuers' and borrowers' written policies and procedures designed to monitor post-issuance compliance with the federal tax rules applicable to tax-exempt obligations (boxes 43 and 44). Do not check items 43 and 44 on the 8038 form unless you have established written procedures in accordance with the instructions referenced directly below. If you choose to "check" items 43 and/or 44, please be prepared to provide copies of such written procedures to the Paid Preparer or any representatives of the IRS upon request. Written procedures should contain certain key characteristics, including making provisions for:

- Due diligence review at regular intervals;
- Identifying the official or employee responsible for review;
- Training of the responsible official/employee;
- Retention of adequate records to substantiate compliance (e.g., records relating to expenditure of proceeds);
- Procedures reasonably expected to timely identify noncompliance; and
- Procedures ensuring that the issuer will take steps to timely correct noncompliance.

For additional guidance on this 8038 form, you can refer to the Documentation Instructions located on the following government website: http://www.irs.gov/app/picklist/list/formsInstructions.html, or contact your local IRS office.

Form **8038-G**
(Rev. September 2018)
Department of the Treasury
Internal Revenue Service

Information Return for Tax-Exempt Governmental Obligations

► **Under Internal Revenue Code section 149(e)**
► **See separate instructions.**
Caution: *If the issue price is under $100,000, use Form 8038-GC.*

OMB No. 1545-0720

Part I Reporting Authority

If **Amended Return**, check here ► ☐

1	Issuer's name **City of Redlands, California**	2	Issuer's employer identification number (EIN) **95-6000766**
3a	Name of person (other than issuer) with whom the IRS may communicate about this return (see instructions)	3b	Telephone number of other person shown on 3a
4	Number and street (or P.O. box if mail is not delivered to street address) / Room/suite **35 Cajon Street**	5	Report number (For IRS Use Only) 3
6	City, town, or post office, state, and ZIP code **Redlands, California 92373**	7	Date of issue **12/31/2021**
8	Name of issue **Government Obligation Contract**	9	CUSIP number **None**
10a	Name and title of officer or other employee of the issuer whom the IRS may call for more information (see instructions) **Mr. Chris Catren, Chief of Police**	10b	Telephone number of officer or other employee shown on 10a **(909) 335-4744**

Part II Type of Issue (enter the issue price). See the instructions and attach schedule.

11	Education	11		
12	Health and hospital	12		
13	Transportation	13		
14	Public safety	14	453,752	41
15	Environment (including sewage bonds)	15		
16	Housing	16		
17	Utilities	17		
18	Other. Describe ►	18		
19	If obligations are TANs or RANs, check only box 19a ► ☐ If obligations are BANs, check only box 19b ► ☐			
20	If obligations are in the form of a lease or installment sale, check box ► ☑			

Part III Description of Obligations. Complete for the entire issue for which this form is being filed.

	(a) Final maturity date	(b) issue price	(c) Stated redemption price at maturity	(d) Weighted average maturity	(e) Yield
21	12/31/2025	$ 453,752.41	$ N/A	4.000 years	2.680 %

Part IV Uses of Proceeds of Bond Issue (including underwriters' discount)

22	Proceeds used for accrued interest			22		
23	Issue price of entire issue (enter amount from line 21, column (b))			23		
24	Proceeds used for bond issuance costs (including underwriters' discount)	24				
25	Proceeds used for credit enhancement	25				
26	Proceeds allocated to reasonably required reserve or replacement fund	26				
27	Proceeds used to refund prior tax-exempt bonds. Complete Part V.	27				
28	Proceeds used to refund prior taxable bonds. Complete Part V.	28				
29	Total (add lines 24 through 28)			29		
30	Nonrefunding proceeds of the issue (subtract line 29 from line 23 and enter amount here)			30		

Part V Description of Refunded Bonds. Complete this part only for refunding bonds.

31 Enter the remaining weighted average maturity of the tax-exempt bonds to be refunded ► _____ years

32 Enter the remaining weighted average maturity of the taxable bonds to be refunded ► _____ years

33 Enter the last date on which the refunded tax-exempt bonds will be called (MM/DD/YYYY) ► _____

34 Enter the date(s) the refunded bonds were issued ► (MM/DD/YYYY)

For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 63773S Form **8038-G** (Rev. 9-2011)

Part VI Miscellaneous

35	Enter the amount of the state volume cap allocated to the issue under section 141(b)(5)	35		
36a	Enter the amount of gross proceeds invested or to be invested in a guaranteed investment contract (GIC) (see instructions)	36a		
b	Enter the final maturity date of the GIC ► (MM/DD/YYYY)			
c	Enter the name of the GIC provider ►			
37	Pooled financings: Enter the amount of the proceeds of this issue that are to be used to make loans to other governmental units	37		

38a If this issue is a loan made from the proceeds of another tax-exempt issue, check box ► ☐ and enter the following information:

b Enter the date of the master pool bond ►(MM/DD/YYYY)

c Enter the EIN of the issuer of the master pool bond ►

d Enter the name of the issuer of the master pool bond ►

39 If the issuer has designated the issue under section 265(b)(3)(B)(i)(III) (small issuer exception), check box ► ☑

40 If the issuer has elected to pay a penalty in lieu of arbitrage rebate, check box ► ☐

41a If the issuer has identified a hedge, check here ► ☐ and enter the following information:

b Name of hedge provider ►

c Type of hedge ►

d Term of hedge ►

42 If the issuer has superintegrated the hedge, check box ► ☐

43 If the issuer has established written procedures to ensure that all nonqualified bonds of this issue are remediated according to the requirements under the Code and Regulations (see instructions), check box ► ☐

44 If the issuer has established written procedures to monitor the requirements of section 148, check box ► ☐

45a If some portion of the proceeds was used to reimburse expenditures, check here ► ☐ and enter the amount of reimbursement. ►

b Enter the date the official intent was adopted ► (MM/DD/YYYY)

Signature and Consent

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I further declare that I consent to the IRS's disclosure of the issuer's return information, as necessary to process this return, to the person that I have authorized above.

Signature of issuer's authorized representative Date ► Type or print name and title

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
H. Evan Howe	H. Evan Howe 2021.12.07 14:20:20-06'00'	12/07/2021		P01438994

Firm's Name ►	Baystone Financial LLC	Firm's EIN ►	48-1223987
Firm's Address ►	10601 Mission Road, Suite 200, Leawood, KS 66206	Phone no.	(800) 752-3562

Form **8038-G** (Rev. 9-2011))

"A City That Works"

City Council/Successor Agency Meeting **L. 3.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of Ordinance No. 2930 (Ordinance Text Amendment No. 360), to amend Title 18 of the Redlands Municipal Code by modifying Chapter 18.92.080(B) pertaining to developments standards in the C-3, General Commercial District to allow residential density in accordance with the existing provisions of Measure "U," and modify the parking requirements for mixed use development and multifamily-attached residential development projects located within one-half mile of a train station (Development Services Director Desatnik)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to adopt Ordinance No. 2930.

RECOMMENDATION:

It is recommended the City Council approve Ordinance No. 2930 (Ordinance Text Amendment No. 360), to amend Title 18 of the Redlands Municipal Code by modifying Chapter 18.92.080(B) pertaining to developments standards in the C-3, General Commercial District to allow residential density in accordance with the existing provisions of Measure "U," and modify the parking requirements for mixed use development and multifamily-attached residential development projects located within one-half mile of a train station.

DISCUSSION:

The proposed ordinance and staff report prepared for the introduction of this ordinance are available in the City Clerk's office.

ALTERNATIVES:

City Council may elect not to adopt this ordinance update.

STRATEGIC PLAN:

Not Applicable

SUBMITTED BY:
Jeanne Donaldson, City Clerk

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Jeanne Donaldson, City Clerk

Fiscal Impact

Discussion:

Codification: $22/per page affected by the change
Legal Publication: $250

Attachments

Ordinance No. 2930

ORDINANCE NO. 2930

AN ORDINANCE OF THE CITY OF REDLANDS AMENDING CHAPTER 18.92 OF THE REDLANDS MUNICIPAL CODE ESTABLISHING NEW C-3 GENERAL COMMERCIAL DISTRICT DEVELOPMENT STANDARDS FOR RESIDENTIAL DENSITY AND PARKING STANDARDS FOR MIXED USE DEVELOPMENT AND MULTIFAMILY-ATTACHED RESIDENTIAL PROJECTS LOCATED WITHIN A ONE-HALF MILE RADIUS FROM A TRAIN STATION.

WHEREAS, Ordinance No. 2930 would amend Chapter 18.92 of Title 18 of the Redlands Municipal Code to establish certain development standards pertaining to residential density and on-site parking requirements for mixed-use development, and multifamily-attached residential, projects located both within the C-3 General Commercial District, and within one-half mile of a train station; and

WHEREAS, on October 12, 2021, the Planning Commission held a noticed public hearing at which interested persons had an opportunity to testify in support of, or opposition to, Ordinance No. 2930 and at which the Planning Commission considered the Ordinance; and

WHEREAS, approval of Ordinance No. 2930 is exempt from environmental review pursuant to Section 15061(b)(3) of the State Guidelines implementing the California Environmental Quality Act because the proposal will not cause any significant environmental effects and will not result in a direct or reasonably foreseeable indirect physical change in the environment; and

WHEREAS, following the public hearing on October 12, 2021, the Planning Commission determined that Ordinance No. 2930 is in conformity with, and advances the goals of, the General Plan to create a compact, pedestrian-oriented environment that is consistent in character with downtown Redlands, while creating the potential to expand the City's economic opportunities and housing options; and

WHEREAS, on October 12, 2021, the Planning Commission recommended to the City Council that proposed Ordinance No. 2930 be approved; and

WHEREAS, in accordance with Government Code section 65090, on or about January 7, 2022, the City Clerk gave notice by publication in a newspaper of general circulation of the holding of a public hearing at which Ordinance No. 2930 would be considered by the City Council; and

WHEREAS, on January 18, 2022, the City Council held a noticed public hearing at which interested persons had an opportunity to testify in support of, or opposition to, Ordinance No. 2930;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDLANDS DOES ORDAIN AS FOLLOWS:

Section 1. The City Council hereby determines that approval of Ordinance No. 2930 is exempt from environmental review under the California Environmental Quality Act ("CEQA") pursuant to Section 15061(b)(3) of the State Guidelines implementing CEQA because it can be seen with certainty that adoption of the Ordinance will not cause any significant environmental effects and will not result in a direct or reasonably foreseeable indirect physical change in the environment.

Section 2. Section 18.92.080 of the Redlands Municipal Code, titled "Conditional Uses," is hereby amended to read as follows:

"18.92.080: CONDITIONAL USES:

A. In the C-3 zone, the following uses may be permitted subject to approval of a conditional use permit:

Uses listed in chapter 18.192 of this title.

Audio and film production studios and schools.

Auto repair establishments; no open service bays shall face a public street, or they shall be screened.

Automobile parking garages and lots, public or private.

Beer and wine stores.

Bus terminals and similar transit facilities.

Commercial amusement establishments, such as skating rinks, bowling lanes, amusement machine arcades, pool halls, dance halls, nightclubs, cocktail lounges, taverns and beer and wine bars.

Drive-in stores, such as cleaner, liquor, milk and food.

Drive-through sales and/or service.

Frozen food locker.

Grocery; with alcohol beverage sales.

Hospitals and sanatoriums.

Mechanical or self-service auto wash.

Mortuaries or funeral homes.

Motels.

Open air sales, display and storage, including:

Miniature golf and similar commercial amusement establishments.

New or used auto, motorcycle and boat sales.

Swimming pools, commercial.

Tool and equipment sales or rental.

Service stations with alcohol beverage sales; all merchandise must be displayed within the building.

Social halls, with alcohol beverage sales.

Specialty food markets with alcohol beverage sales.

B. Residential uses are permitted subject to approval of a conditional use permit and (i) may be combined with nonresidential uses as a mixed use development, or (ii) be developed as a multifamily-attached residential project, in an existing building or an entirely new building provided:

1. The residential density permitted shall be that allowed by the R-3 district; provided, however, that for projects deemed exempt from the "Principles of Managed Development" (section 4.2A) of the City's General Plan, pursuant to section 4.2B, for the reason that the project is determined to be development directly related to a proposed rail station, the floor area ratio shall govern the density/intensity of the project; and

2. For mixed use and multifamily attached residential projects on a property, all or part of which is within a one-half mile radius of a train station, required parking for the residential units shall be provided on site in accordance with subsection (a) below, in addition to that required for the commercial uses in accordance with subsection (b) below. Residential guest spaces and commercial spaces may be shared.

(a) Residential attached units (apartments, condominiums, townhomes):

i. Units up to 999 sq. ft.: 1.0 space per unit.
ii. Units 1,000 to 1,499 sq. ft.: 1.5 space per unit.
iii. Units 1,500 sq. ft. or more: 2.0 space per unit.
iv. Guests: 0.25 space per unit
v. Live/Work units up to 1,499 sq. ft.: 1.0 space per unit.
vi. Live/Work units 1,500 sq. ft. or more: see Commercial.

(b) Commercial uses (retail, restaurant, office, personal services, and neighborhood-serving uses) within mixed use multi-tenant buildings:

i. Ground floor: 1 space per 300 sq. ft. of gross ground floor building area.
ii. Upper floors: 1 space per 350 sq. ft. of gross upper floor building area.

3. For mixed use projects on a property not within a one-half mile radius from a train station, required parking for the residential units shall be provided on site, in addition to that required for the commercial uses, in accordance with Chapter 18.164 of this Title 18, except that up to fifty

percent (50%) of the required guest parking spaces for the residential units may jointly use the required parking spaces for the commercial uses."

Section 3. The Mayor shall sign this ordinance and the City Clerk shall certify to the adoption of this ordinance and shall cause it, or a summary of it, to be published once in the Redlands Daily Facts, a newspaper of general circulation within the City, and thereafter, this ordinance shall take effect as provided by law.

_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

I, Jeanne Donaldson, City Clerk, City of Redlands, hereby certify that the foregoing Ordinance was duly adopted by the City Council at the regular meeting thereof, held on the 18th day of January, 2022, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeanne Donaldson, City Clerk

"A City That Works"

City Council/Successor Agency Meeting **L. 4.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of an agreement with LiftOff LLC for the provision of software licensing and consulting services in the amount of $160,000 for the initial term, with an option for four additional extension terms, each in the amount of $130,000 bringing the total compensation during the initial term and four extension terms to an amount not-to-exceed $680,000 (Management Services/Finance Director Garcia)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motion is provided:

I move to approve the agreement with LiftOff LLC for the provision of software licensing and consulting services in the amount of $160,000 for the initial term, with an option for four additional extension terms, each in the amount of $130,000 bringing the total compensation during the initial term and four extension terms to amount not-to-exceed $680,000.

RECOMMENDATION:

Staff recommends the City Council approve the agreement with LiftOff LLC for the provision of software licensing and consulting services in the amount of $160,000 for the initial term, with an option for four additional extension terms, each in the amount of $130,000 bringing the total compensation during the initial term and four extension terms to amount not-to-exceed $680,000.

DISCUSSION:

The City has successfully utilized on-premise 2010 Microsoft Exchange servers for the last decade. As technology moves to more cloud-based solutions, staff has begun to identify new functionality, applications, services, time, and cost-effective benefits to the migration of the City's current desktop application and on-premise Exchange Server to a cloud-based Office 365 platform. The current solution for Microsoft Exchange is no longer supported and therefore critical patches and other security updates that help keep the City safe from external threats will no longer be available. Moving to Office 365 cloud-based software allows the City to leverage new technology directly supported by Microsoft, providing the most up-to-date enhancements to Microsoft Office products without IT staff resources directly involved. Many federal departments and state and local governments are moving to the platform across the country.

Public sector agencies have traditionally purchased hardware & software assets using a capital expenditure (CapEx) model where large investments in IT are made close to the end of life of the assets they are replacing - every 5-10 years. This model conflicts with the need to constantly stay up-to-date with the latest trends in technology. The real value of "information technology" is in the end-user experience, when technology enhances an employee's productivity & effectiveness. This is usually realized through software, not the underlying hardware infrastructure. By shifting to the cloud and, thereby, to an operating expenditure (OpEx) model, the annual cost may appear to be more, but over time there are significant gains in productivity and the focus remains on providing best in class software to users.

The cloud-based platform would eliminate two existing servers, saving resources and IT staff time normally spent maintaining those on-premise servers. Some other benefits of the Microsoft Office 365 model include:

- Advanced data loss prevention features
- Enhanced security features from Microsoft to help thwart computer hacking attempts
- Improved archiving capabilities in support of the City's data retention policies
- Advanced litigation hold and public records request tools
- Increased mailbox size for staff by up to 100GB
- Cloud storage for each licensed user

The City issued a request for proposal (RFP) for professional services to provide Microsoft Office 365 Migration Services as well as Microsoft Office 365 Licenses. The City received fifteen responsive bids. Staff from the Division of Innovation and Technology reviewed and ranked the proposals. LiftOff LLC was

selected as the highest ranked consulting firm based on their extensive specialization both in Office 365 migrations and their experience working with over 50 California public sector clients.

ALTERNATIVES:

Do not approve the agreement with LiftOff LLC, and we continue to utilize the on-premises 2010 Microsoft Exchange Servers and Microsoft Office Suites.

STRATEGIC PLAN:

Priority Focus Area – C INFRASTRUCTURE
Objective C-1:
Implement Information and Communications Technology Upgrades (Management Services/IT)

SUBMITTED BY:
Danielle Garcia, Management Services/Finance Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager
Dana Abramovitz-Daniel, Procurement Manager

PREPARED BY:
Eric Owens, Network Engineer

Fiscal Impact

Fiscal Year:	FY 2021-22
Revenue Generating:	No
Appropriation Required Y/N:	No
Amount:	$160,000
Budgeted Y/N:	Yes
Account No.:	604900
Discussion:	

The City will pay $160,000 for the scope of services included in the agreement during the initial term of one year, which covers both implementation and cutover to the new system ($30,000) as well as the costs for the annual subscription for email services ($130,000). The annual subscription costs are anticipated to be lower initially as we migrate users in groups and includes room for additional user licenses during the later terms of the agreement.

The agreement includes four additional one-year terms each at a cost not-to-exceed $130,000, reflecting the annual subscription costs, for a total five-year cost of $680,000. Funding for this agreement is included in the IT Division's Operating Budget. Subsequent years' costs will be included with the division's corresponding budget requests.

Attachments

LiftOff Agreement

AGREEMENT TO PERFORM PROFESSIONAL SERVICES

This agreement for the provision of professional software licensing and consulting services ("Agreement") is made and entered in this 1st day of February, 2022 ("Effective Date"), by and between the City of Redlands, a municipal corporation ("City") and LiftOff, LLC, a Maryland limited liability company ("Consultant"). City and Consultant are sometimes individually referred to herein as a "Party" and, together, as the "Parties." In consideration of the mutual promises contained herein, City and Consultant agree as follows:

ARTICLE 1 – ENGAGEMENT OF CONSULTANT

1.1 City hereby engages Consultant to provide Microsoft Office 365 licensing and consulting services for City (the "Services").

1.2 The Services shall be performed by Consultant in a professional manner, and Consultant represents that it has the skill and the professional expertise necessary to provide the Services to City at a level of competency presently maintained by other practicing professional consultants in the industry providing like and similar types of Services.

ARTICLE 2 – SERVICES OF CONSULTANT

2.1 The Services that Consultant shall perform are more particularly described in Exhibit "A," titled "Scope of Services," which is attached hereto and incorporated herein by reference.

2.2 Consultant shall comply with applicable federal, state and local laws and regulations in the performance of this Agreement including, but not limited to, any applicable State prevailing wage laws.

ARTICLE 3 – RESPONSIBILITIES OF CITY

3.1 City designates Danielle Garcia, Management Services/Finance Director, as City's representative with respect to performance of the Services, and such person shall have the authority to transmit instructions, receive information, interpret and define City's policies and decisions with respect to performance of the Services.

ARTICLE 4 – PERFORMANCE OF SERVICES

4.1 Consultant shall perform and complete the Services in a prompt and diligent manner in accordance with the schedule set forth in Exhibit "B," titled "Project Schedule," which is attached hereto and incorporated herein by reference.

4.2 The term of this Agreement shall be for a period of one (1) year from the Effective Date of this Agreement (the "Initial Term"). The City shall have the option to extend the Initial Term of this Agreement by four (4) additional one-year terms (each, an "Extended Term"), on the same terms and conditions, by providing written notice to Consultant at least thirty (30) days prior to the expiration of the Initial Term or any Extended Term

4.3 If Consultant's Services include deliverable electronic visual presentation materials, such materials shall be delivered in a form, and made available to City, consistent with City Council-adopted policy for the same. It shall be the obligation of Consultant to obtain a copy of such policy from City staff.

ARTICLE 5 – PAYMENTS TO CONSULTANT

5.1 The total annual compensation for Consultant's performance of the Services shall be in the amount of one hundred sixty thousand dollars ($160,000) during the Initial Term, with four additional one-year extension options ("Extended Terms") of one hundred thirty thousand dollars ($130,000) bringing the total compensation during the Initial Term and four (4) Extension Terms to an amount of six hundred eighty thousand dollars ($680,000). City shall pay Consultant on a time and materials basis up to the not to exceed amount in accordance with Exhibit "C," titled "Fee Schedule," which is attached hereto and incorporated herein by reference.

5.2 Consultant shall submit monthly invoices to City describing the Services performed during the preceding month. Consultant's invoices shall include a brief description of the Services performed, the dates the Services were performed, the number of hours spent and by whom, and a description of reimbursable expenses related to the Services. City shall pay Consultant no later than thirty (30) days after receipt and approval by City of Consultant's invoice.

5.3 Any notice or other communication required, or which may be given, pursuant to this Agreement, shall be in writing. Any such notice shall be deemed delivered (i) on the date of delivery in person; (ii) five (5) days after deposit in first class registered mail, with return receipt requested; (iii) on the actual delivery date if deposited with an overnight courier; or (iv) on the date sent by facsimile or electronic mail transmission (including PDF), if confirmed with a copy sent contemporaneously by first class, certified, registered or express mail; in each case properly posted and fully prepaid to the appropriate address set forth below, or such other address as a Party may provide notice in accordance with this section:

CITY:

City Clerk
City of Redlands
35 Cajon Street
P.O. Box 3005 (mailing)
Redlands, CA 92373
jdonaldson@cityofredlands.org
Phone: (909) 798-7531

CONSULTANT:

Ronald Braatz, President
LiftOff, LLC
1667 Patrice Circle
Crofton, MD 21114
rbraatz@LiftOff, LLConline.com
Phone: (410)419-1591

ARTICLE 6 – INSURANCE AND INDEMNIFICATION

6.1 The following insurance coverage required by this Agreement shall be maintained by Consultant for the duration of its performance of the Services. Consultant shall not perform any Services unless and until the required insurance listed below is obtained by Consultant. Consultant shall provide City with certificates of insurance and endorsements evidencing such insurance prior to commencement of the Services. Insurance policies shall include a provision prohibiting cancellation or modification of the policy except upon thirty (30) days prior written notice to City.

A. Workers' Compensation and Employer's Liability insurance in the amount that meets statutory requirements with an insurance carrier acceptable to City, or certification to City that Consultant is self-insured or exempt from the workers' compensation laws of the State of California. Consultant shall execute and provide City with Exhibit "D," titled "Workers' Compensation Insurance Certification," which is attached hereto and incorporated herein by this reference, prior to performance of the Services.

B. Comprehensive General Liability insurance with carriers acceptable to City in the minimum amount of One Million Dollars ($1,000,000) per occurrence and Two Million Dollars ($2,000,000) aggregate, for public liability, property damage and personal injury is required. City shall be named as an additional insured and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

C. Consultant shall secure and maintain professional liability insurance throughout the term of this Agreement in the amount of One Million Dollars ($1,000,000) per claim made.

D. Business Auto Liability coverage, with minimum limits of One Million Dollars ($1,000,000) per occurrence, combined single limit bodily injury liability and property damage liability. This coverage shall include all Consultant owned vehicles used in connection with Consultant's provision of the Services, hired and non-owned vehicles, and employee non-ownership vehicles. City shall be named as an additional insured and such insurance shall be primary and non-contributing to any insurance or self-insurance maintained by City.

E. Consultant is expressly prohibited from assigning or subcontracting any of the Services without the prior written consent of City. In the event of mutual agreement by the Parties to assign or subcontract a portion of the Services, Consultant shall add such assignee or subcontractor as an additional insured to the insurance policies required hereby and provide City with the insurance endorsements prior to any Services being performed by the assignee or subcontractor.

6.2 Consultant shall defend, indemnify and hold harmless City and its elected and appointed officials, employees and agents from and against any and all claims, losses or liability, including attorneys' fees, arising from injury or death to persons or damage to property

occasioned by any negligent act or omission by, or the willful misconduct of, Consultant, or its officers, employees and agents in performing the Services.

ARTICLE 7 – CONFLICTS OF INTEREST

7.1 Consultant covenants and represents that it does not have any investment or interest in any real property that may be the subject of this Agreement or any other source of income, interest in real property or investment that would be affected in any manner or degree by the performance of Consultant's Services. Consultant further covenants and represents that in the performance of its duties hereunder, no person having any such interest shall perform any Services under this Agreement.

7.2 Consultant agrees it is not a designated employee within the meaning of the Political Reform Act because Consultant:

A. Does not make a governmental decision whether to:

(i) approve a rate, rule or regulation, or adopt or enforce a City law;
(ii) issue, deny, suspend or revoke any City permit, license, application, certification, approval, order or similar authorization or entitlement;
(iii) authorize City to enter into, modify or renew a contract;
(iv) grant City approval to a contract that requires City approval and to which City is a party, or to the specifications for such a contract;
(v) grant City approval to a plan, design, report, study or similar item;
(vi) adopt, or grant City approval of, policies, standards or guidelines for City or for any subdivision thereof.

B. Does not serve in a staff capacity with City and in that capacity, participate in making a governmental decision or otherwise perform the same or substantially the same duties for City that would otherwise be performed by an individual holding a position specified in City's Conflict of Interest Code under Government Code section 87302.

7.3 In the event City determines that Consultant must disclose its financial interests, Consultant shall complete and file a Fair Political Practices Commission Form 700, Statement of Economic Interests, with the City Clerk's office pursuant to the written instructions provided by the City Clerk.

ARTICLE 8 – GENERAL CONSIDERATIONS

8.1 In the event any action is commenced to enforce or interpret any of the terms or conditions of this Agreement the prevailing Party shall, in addition to any costs and other relief, be entitled to the recovery of its reasonable attorneys' fees, including fees for the use of in-house counsel by a Party.

8.2 Consultant shall not assign any of the Services, except with the prior written approval of City and in strict compliance with the terms and conditions of this Agreement. Any assignment or attempted assignment without such prior written consent may, in the sole discretion of City, result in City's immediate termination of this Agreement.

8.3 Consultant is for all purposes under this Agreement an independent contractor and shall perform the Services as an independent contractor. Neither City nor any its agents shall have control over the conduct of Consultant or Consultant's employees, except as herein set forth. Consultant shall supply all necessary tools and instrumentalities required to perform the Services. Assigned personnel employed by Consultant are for its account only, and in no event shall Consultant or personnel retained by it be deemed to have been employed by City or engaged by City for the account of, or on behalf of City. Consultant shall have no authority, express or implied, to act on behalf of City in any capacity whatsoever as an agent, nor shall Consultant have any authority, express or implied, to bind City to any obligation.

8.4 This Agreement may be terminated by City, in its sole discretion, by providing not less than five (5) days prior written notice to Consultant of City's intent to terminate. If this Agreement is terminated by City, an adjustment to Consultant's compensation shall be made, but (1) no amount shall be allowed for anticipated profit or unperformed Services, and (2) any payment due Consultant at the time of termination may be adjusted to the extent of any additional costs to City occasioned by any default by Consultant. Upon receipt of a termination notice, Consultant shall immediately discontinue its provision of the Services and, within five (5) days of the date of the termination notice, deliver or otherwise make available to City, copies (in both hard copy and electronic form, where applicable) of project related data, design calculations, drawings, specifications, reports, estimates, summaries and such other information and materials as may have been accumulated by Consultant in performing the Services. Consultant shall be compensated on a pro-rata basis for Services completed up to the date of termination.

8.5 Consultant shall maintain books, ledgers, invoices, accounts and other records and documents evidencing costs and expenses related to the Services for a period of three (3) years, or for any longer period required by law, from the date of final payment to Consultant pursuant to this Agreement. Such books shall be available at reasonable times for examination by City at the office of Consultant.

8.6 This Agreement, including the Exhibits incorporated herein by reference, represents the entire agreement and understanding between the Parties as to the matters contained herein, and any prior negotiations, written proposals or verbal agreements relating to such matters are superseded by this Agreement. Except as otherwise provided for herein, any amendment to this Agreement shall be in writing, approved by City and signed by City and Consultant.

8.7 This Agreement shall be governed by and construed in accordance with the laws of the State of California, without regard to its conflicts of laws provisions. The Parties agree that all actions or proceedings arising in connection with this Agreement shall be tried and

litigated only in the state courts located in San Bernardino County, California, and the federal courts located in Riverside County, California.

8.8 If one or more of the sentences, clauses, paragraphs or sections contained in this Agreement is declared invalid, void or unenforceable by a court of competent jurisdiction, the same shall be deemed severable from the remainder of this Agreement and shall not affect, impair or invalidate the remaining sentences, clauses, paragraphs or sections contained herein, unless to do so would deprive a Party of a material benefit of its bargain under this Agreement.

IN WITNESS WHEREOF, duly authorized representatives of City and Consultant have signed in confirmation of this Agreement.

CITY OF REDLANDS	LIFTOFF, LLC
By: _____	By: _____
Paul T. Barich, Mayor	Ronald Braatz, President

ATTEST:

_____
Jeanne Donaldson, City Clerk

EXHIBIT "A"

SCOPE OF SERVICES

LIFTOFF, LLC will provide Office 365 Guided Deployment Services (GDS) focused on the migration to the Microsoft Office 365 solution. The GDS consulting is delivered using a "Coach/Mentor" approach in which your IT team will be heavily involved throughout the entire process and will work directly with the LiftOff, LLC consultants. Together, we will work through a series of webinar appointments (typically 1-2 hours each) as we work through project milestones to deploy the system efficiently and successfully. We have found this approach of keeping your IT team invested in the project to be an extremely effective training mechanism; once the project is complete, your IT staff is fully capable of managing and maintaining the system in the future.

LiftOff, LLC's expertise is laser focused on the Office 365 systems. If you require integration with other third-party applications, you will be responsible for working with your other vendors to remedy issues. For example, phone systems, firewalls, fax systems, anti-spam, anti-virus, archiving, custom code environments, and accounting systems can integrate with Office 365. We will do our best to facilitate, but these integrations will likely require that product vendor.

The Office 365 solution is quickly evolving, and the product roadmap changes frequently. It is important to understand that some features may be enhanced or modified during the project. The Microsoft TechNet articles are the best source of information today.

Specifically, LiftOff, LLC's GDS work will:

1.1. Consist of an **Office 365 Assessment Workshop** where we will complete an analysis of the current email environment and ensure that requirements are captured, core functionality is reviewed, and details for the migration are discussed and reviewed. This planning session will be conducted via phone and typically takes about two hours to complete. Afterwards, we will map on the remainder of the project plan.

1.2. Consist of **Setup and Pre-Staging** in the Office 365 Admin Console where we will access your portal together and begin the initial configuration the new Office 365 tenant. This will include:

1.2.1. Adding and verifying your email domains in Office 365 to show ownership.
1.2.2. Ensure that the on-premises Active Directory is organized properly for Azure AD Connect/Directory Sync (required for a hybrid migration).
1.2.3. Install and configure Azure AD Connect to synchronize all mail-enabled objects (users, contacts, and groups) from on-premises Active Directory to Office 365/Azure. Typically, a new on-premises server will be required for this purpose.

NOTE: This does NOT include the setup, configuration, or support of ADFS or other third-party authentication systems.

1.2.4. Configure and test single sign-on with Azure AD Connect. A group policy will be required for this feature.

1.2.5. Install, configure, and test secure SMTP Relay going through Office 365.

1.3. This is an **Exchange to Office 365 migration, and we intend to perform TWO DIFFERENT Microsoft HYBRID migrations. We will complete the first hybrid migration, and then repeat the entire process (minus Admin training) for the second phase of the project.** This utilizes the built-in migration tools included with Office 365 at no additional cost. There are many advantages of using the hybrid migration path and we will make every attempt to make this work. In the extremely rare event that the hybrid (Microsoft) wizard cannot be used for email or Public Folders, we will switch to a third-party migration tool (MigrationWiz). Client is responsible for the cost of the migration tool. Migration Configuration will include the following:

1.3.1. Assess the on-premises Exchange environment and adjust the configuration, as needed, to optimize the hybrid process.
The source Exchange server MUST be fully accessible and fully updated for this to work.

1.3.2. Install and configure the Hybrid Configuration Wizard to establish the connection between the on-premises systems and Exchange Online for both mailbox migrations and intra-organizational mail flow.

1.3.3. Migrate the initial batch of users. This is normally one or more IT users who understand the process and potential troubleshooting that may be required post migration.

1.3.4. Provide documentation for end users regarding "What to Expect" and also Mobile Device configuration for the point of cutover.
NOTE: In nearly every migration, all mobile devices (phones and tablets) will need to have their mail profile reconfigured following the mailbox cutover.

1.3.5. Define a migration strategy for the remaining users and assist with any migration complications that may arise.

1.3.6. Migrate public folders from on-premises to Exchange Online.

1.3.7. Once all data is migrated, work with the Client to decommission the hybrid configuration and, if applicable, remove the on-premises Exchange server(s).

1.4. Office 365 IT Admin Training & Tenant Configuration. These training and configuration settings will span 6-10 sessions.

1.4.1. **Office 365 Admin Center**

1.4.1.1. Review the proper On-boarding process for new users.

1.4.1.2. Review the proper Off-boarding process for former users while maintaining compliance (if needed).

1.4.1.3. Promoting and demoting users with administrative abilities in Office 365.

1.4.1.4. Reviewing the Office 365 Message Center (for upcoming changes) and Health Dashboard (for potential problems).

1.4.2. **Exchange Admin Center**

1.4.2.1. Review management of email related attributes such as mailbox sharing, quotas, online archives, etc.
1.4.2.2. Review proper group creation process in the cloud.
1.4.2.3. Setup mail flow rules including inbound message warnings, outbound message disclaimers and Office Message Encryption (if applicable).
1.4.2.4. Setup mobile device rules and policies and review mobile device remote wipe.

1.4.3. **Exchange Online PowerShell**
1.4.3.1. Setup mailbox activity auditing.
1.4.3.2. Setup unlimited auto-expanding online archive (if applicable).
1.4.3.3. Review resource mailbox management.
1.4.3.4. Disable Microsoft 365 Group creation and review proper methods for creating these groups.

1.4.4. **Microsoft Teams Admin Center**
1.4.4.1. Review best practices for creating & managing Teams.
1.4.4.2. Configure optimized Teams settings for all users, groups, and Teams themselves.

1.4.5. **SharePoint Admin Center**
1.4.5.1. Configure best practices for sharing of files and folders in SharePoint, Teams and OneDrive.
1.4.5.2. Configure Sync settings for the organization.
1.4.5.3. Configure default OneDrive size

1.4.6. **Review Teams, OneDrive, Office Online & SharePoint**
1.4.6.1. Review the Teams app and website
1.4.6.2. Review OneDrive & SharePoint Online and best practices for ingesting files.
1.4.6.3. Review the OneDrive Sync Client and best practices for using it.

1.5. Review Office Online and best options for using Office apps in a browser.
Securing Your Office 365 & Azure Organization. We will work with your IT staff to ensure that all security and compliance best practices are in place by the conclusion of the project.

1.5.1. **Security Admin Center**
1.5.1.1. Configure appropriate anti-spam, anti-malware, and anti-phishing settings.
1.5.1.2. Configure outgoing message management including protection of unwanted external forwarding.
1.5.1.3. Configure DKIM, DMARC and SPF.
1.5.1.4. Review Secure Score

1.5.2. **Compliance Admin Center**
1.5.2.1. Configure online compliance retention policies (if applicable)
1.5.2.2. Review eDiscovery/Content Search process.
1.5.2.3. Review the Audit Log and enable Auditing for (non-mailbox) activity in Office 365.

1.5.3. **Azure Active Directory Security & Multi-Factor Authentication**
1.5.3.1. Review Risky Sign-ins, Risky Users and Risk Detections
1.5.3.2. Configure Risk Event Notifications for Admins

1.5.3.3. Configure Conditional Access Policies to prevent non-US logins (if applicable), require MFA for Admins (or All Users, if applicable) and block Legacy Authentication.

1.5.3.4. Review Sign-In Logs.

1.5.3.5. Optimize MFA Settings for the organization.

1.5.4. Review best practices for rolling out MFA (if applicable).

1.5.5. **This project will NOT include Microsoft's Endpoint Management or Intune Products.**

1.6. Workstation Configuration. LiftOff, LLC will offer guidance and tools for the workstation configuration.

1.6.1. LiftOff, LLC will work with the IT staff to setup an Office Deployment point on the network either as a network share using Microsoft's Office Deployment Tool or, if available, via System Center Configuration Manager (SCCM).

1.6.2. Review proper configuration of the Outlook desktop client at the point of mailbox cutover. **Cached Mode in desktop Outlook is required for Office 365 connectivity.**

NOTE: Although LiftOff, LLC will provide guidance regarding workstation configuration and assist with troubleshooting, LiftOff, LLC will NOT be directly responsible for the configuration of the workstations. Your IT staff is onsite and will complete this configuration.

1.7. Post Mailbox Migration. LiftOff, LLC will work with your IT staff to determine the best solution for decommissioning the Exchange hybrid pieces.

1.7.1. If applicable, work with the Client to remove the hybrid connection pieces and shutoff/remove the Exchange systems from the on-premises environment.

1.7.2. Alternatively, if desired, LiftOff, LLC can assist your organization with retaining an Exchange management server. **NOTE:** This is extremely uncommon and requires continuous administration, updating and upgrading to avoid known security issues with on-premises Exchange.

1.7.3. Update DNS settings facing the Internet and on-premises in Active Directory, as needed, to point all mailbox connectivity and mail flow (if needed) to Office 365/Exchange Online.

1.8. Additional Microsoft Products. This project does not include Microsoft products that aren't listed in this Statement of Work. For example, this project will not include ADFS, SharePoint website design, PowerBI, Microsoft Flow, Microsoft Project, or add-ons for Teams, Outlook, or Microsoft Office. Although LiftOff, LLC may be able to assist with various questions related to products not mentioned in this Statement of Work, your best source of assistance would be directly through Microsoft's support.

2. Investment & Payment Structure

2.1. The cost of the services outlined in Section 1 above is **$30,000.** This is the client cost and has already factored in any incentives or promotions. The discounted consulting price requires the Client to purchase AOS-G annual licensing through LIFTOFF, LLC for a period of three years. The AOS-G licensing includes a "price-lock" protection for three years. This pricing is valid for 30 days past the date identified in section 3.1. Invoicing is done after the Assessment Process (1.1) and terms are Net 30.

2.2. The client acknowledges that the Office 365 Microsoft Partner, LiftOff, LLC LLC, may receive payments from Microsoft as a result of the consulting done with LIFTOFF, LLC.

2.3. Migration Wiz Premium multi-pass licenses may be recommended for the project. If Client agrees to use Migration Wiz, Client will be responsible for purchasing licenses for all users. Migration Wiz licenses are typically $15 per mailbox. All migration licenses are purchased directly through LIFTOFF, LLC.

EXHIBIT "B"

PROJECT SCHEDULE

Task	Duration
Kickoff / Assessment	1 Day
Setup new government tenant, add domains, setup Azure AD Connect and setup the hybrid connector	2 Days
Setup Office Deployment Tool & SMTP Relay Solution	1 Day
IT Admin Training & Configuration Office Admin Center & Exchange Admin Center	1 Day
Office Admin Center & Exchange Admin Center	1 Day
Office 365 PowerShell	1 Day
Office 365 Security & Compliance	1 Day
Teams, SharePoint, OneDrive and Office Online	2 Days
MFA & Azure AD Premium Security	1 Day
Migrate IT Mailbox(es)	1 Day
Migrate The Rest Of The Mailboxes	2 Days
Migrate Public Folders to 365	1 Day
Hybrid wrap-up	1 Day
Change Autodiscover to point to O365	1 Day
Remove on-premises Autodiscover Internal URI (SCP)	
Change Mail Flow To Exchange Online	
Review/Setup DMARC, DKIM and SPF	
Finalize The Migration & Remove Exchange On-Premises	

EXHIBIT "C"

FEE SCHEDULE

G SKU Item Name	Part Number	Term in Months	Price / User / Month	Licenses	Cost / Year
LiftOff, LLC Professional Services		One Time Fee - Initial Year			$30,000
Office 365 Plan G3	AAA-11894	12	$20.00	420	$100,800.00
Exchange Online Plan 2	3NS-00003	12	$8.00	164	$15,744.00
Defender Plan 1 GCC	3GU-00001	12	$2.00	552	$13,248.00
Azure AD Premium 2	MQN-00001	12	$8.50	2	$204.00

First Year Total	**$159,996.00**
Years 2-5 Total	**$129,996.00**

This Fee Schedule is an illustration of potential annual Microsoft Office 365 Licensing Costs. The numbers will fluctuate as City staffing levels increase or decrease, but will likely be much lower annually.

EXHIBIT "D"

WORKERS' COMPENSATION INSURANCE CERTIFICATION

Every employer, except the State, shall secure the payment of compensation in one or more of the following ways:

(a) By being insured against liability to pay compensation by one or more insurers duly authorized to write compensation insurance in this State.

(b) By securing from the Director of Industrial Relations, a certificate of consent to self-insure, either as an individual employer, or as one employer in a group of employers, which may be given upon furnishing proof satisfactory to the Director of Industrial Relations of ability to self-insure and to pay any compensation that may become due to his or her employees.

CHECK ONE

_____I am aware of the provisions of Section 3700 of the Labor Code which requires every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and I will comply with such provisions before commencing the performance of the work and activities required or permitted under this Agreement. (Labor Code §1861).

_____I affirm that at all times, in performing the work and activities required or permitted under this Agreement, I shall not employ any person in any manner such that I become subject to the workers' compensation laws of California. However, at any time, if I employ any person such that I become subject to the workers' compensation laws of California, immediately I shall provide the City with a certificate of consent to self-insure, or a certification of workers' compensation insurance.

I certify under penalty of perjury under the laws of the State of California that the information and representations made in this certificate are true and correct.

LIFTOFF, LLC

By:_____ Date: _____

Ronald Braatz, President

"A City That Works"

City Council/Successor Agency Meeting **L. 5.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of a construction contract with Borden Excavating, Inc. for the 2021 CIP Water Pipeline Replacement Project in an amount not to exceed $3,555,000, and determine that the project is categorically exempt from environmental review pursuant to Section 15302 of the State's guidelines implementing the California Environmental Quality Act (Municipal Utilities and Engineering Director Harris)

MOTION(S):

If City Council determines staff's recommendations are appropriate, the following motions are provided:

1. I move that the City Council determine approval of a Construction Contract and construction of the 2021 CIP Water Pipeline Replacement Project are categorically exempt from environmental review in accordance with Section 15302 of the State's guidelines implementing the California Environmental Quality Act; and

2. I move that the City Council approve the 2021 CIP Water Pipeline Replacement Project plans and specifications, and award a Construction Contract to Borden Excavating Inc. in an amount not to exceed $3,555,000.

RECOMMENDATION:

Staff recommends City Council determine approval of a Construction Contract and construction of the 2021 CIP Water Pipeline Replacement Project are categorically exempt from environmental review in accordance with Section 15302 of the State's guidelines implementing the California Environmental Quality Act. Staff also recommends that City Council approve the 2021 Water Pipeline Replacement Project plans and specifications, and award a Construction Contract to Borden Excavating, Inc. in an amount not to exceed $3,555,000.

DISCUSSION:

The 2021 CIP Water Pipeline Replacement Project (Project) will replace approximately four (4) miles of aging and deteriorated water pipelines. Each year, a portion of revenues generated through water utility rates is used to replace aging water pipelines throughout the City. These pipelines are selected based on maintenance history, inspection records, and coordination with future paving improvements.

MUED staff prepared the plans and specifications in-house and advertised the Project on November 24, 2021. On December 15, 2021, the City Clerk's office received the following bids:

BID OPENING REPORT SUMMARY	
Bidder	**Bid Amount**
1. Borden Excavating, Inc., Calimesa, CA	$3,555,000.00
2. MCC Equipment Rentals, Inc., Yucaipa, CA	* $3,677,886.48
3. Tryco General Engineering, Rimforest, CA	$3,684,204.00
4. The Van Dyke Corporation, Twentynine Palms, CA	$3,852,307.00
5. All Cities Engineering, Jurupa Valley, CA	* $4,089,707.50
6. Dominguez General Engineering, Inc., Pomona, CA	$4,567,588.00
7. E.J. Meyer Company, Highland, CA	$4,688,888.00
8. Kirtley Construction, Inc., San Bernardino, CA	$4,695,237.00
9. Christensen Brothers General Engineering, Apple Valley, CA	$6,144,414.00
10. Weka, Inc., Highland, CA	$6,165,912.00
11. J.R. Filanc Construction Company, Escondido, CA	* $7,442,608.00

*An arithmetic error was discovered in the bid proposal. Total bid amount was corrected and highlighted in attached bid analysis to identify arithmetic errors but did not affect ranking.

Each bid was reviewed by staff to determine responsiveness to bid requirements and Borden Excavating, Inc. was determined to be the lowest responsive bidder. Staff recommends awarding a Construction Contract to Borden Excavating, Inc. in an amount not to exceed $3,555,000. The engineer's estimate for the Project is $4,000,000. The Project will be completed within one hundred forty (140) calendar days.

This Project is categorically exempt from environmental review in accordance with Section 15302 of the State's guidelines implementing the California Environmental Quality Act as the Project involves the replacement of an existing utility facility with a negligible expansion of capacity.

ALTERNATIVES:

City Council may deny the staff recommendations. However, this will result in further deterioration of aging water distribution system piping.

STRATEGIC PLAN:

The Project supports Objective C-9 to replace old and leaking pipelines to reduce water loss and service interruptions.

SUBMITTED BY:
John R. Harris, Municipal Utilities and Engineering Director

RECOMMENDED BY:
Charles M. Duggan Jr., City Manager

REVIEWED BY:
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director
Kevin O. Watson, Utilities Operations Manager
Goutam K. Dobey, Engineering Manager

PREPARED BY:
Gerard Nepomuceno, Associate Engineer

Fiscal Impact

Fiscal Year:	FY 21/22
Appropriation Required Y/N:	No
Budgeted Y/N:	Yes
Account No.:	501910

Discussion:

There is no fiscal impact. The cost for this project is included in the FY 21/22 MUED Budget.

Attachments

A. Borden Public Works Contract
B. Bid Opening Report
C. Bid Analysis
D. Location Map

PUBLIC WORK CONSTRUCTION CONTRACT

This Public Work Construction contract ("Contract") is made and entered into this 1st day of February, 2022, by and between the City of Redlands, a municipal corporation, organized and existing under the laws of the State of California (hereinafter "City"), and Borden Excavating, Inc. (hereinafter "Contractor"). City and Contractor are sometimes individually referred to herein as a "Party" and, together, as the "Parties."

In consideration of the mutual promises contained herein, City and Contractor agree as follows:

1. **SCOPE OF WORK:** Contractor shall furnish all materials and will perform all of the work for the following: 2021 CIP Water Replacement Project, complete all items as required by the Contract Documents (as herein defined) and Specifications for City's 2021 CIP Water Replacement Project, Project No. 501039 (the "Work").

2. **CONTRACT SUM:** City shall pay Contractor the sum of three million five hundred fifty five thousand dollars ($3,555,000) as consideration for its performance of the Work in accordance with the terms and conditions set forth in the Contract Documents. Pursuant to Public Contract Code Section 22300, Contractor has the option to deposit securities with an escrow agent as a substitute for retention of earnings required to be withheld by City pursuant to an escrow agreement as set forth in Public Contract Code section 22300.

3. **TIME FOR COMPLETION:** The Work shall be completed within one hundred forty (140) calendar days from and after the date of City's issuance of a Notice to Proceed to Contractor.

4. **LIQUIDATED DAMAGES:** Contractor's failure to complete the Work within the time allowed will result in damages being sustained by City. Such damages are, and will continue to be, impracticable and extremely difficult to determine. Accordingly, Contractor shall pay to City, or have withheld from monies due to Contractor, the sum of five hundred dollars ($500) for each consecutive calendar day in excess of the specified time for completion of the Work. Execution of this Contract shall constitute agreement by City and Contractor that five hundred dollars ($500) per day is the estimated damage to City caused by the failure of the Contractor to complete the work within the allowed time. Such sum is liquidated damages and shall not be construed as a penalty, and may be deducted from payments due the Contractor if such delay occurs.

5. **CONTRACT DOCUMENTS:** This Contract incorporates by reference the following: Notice Inviting Bids, Instructions to Bidders, Contractor's Proposal, Bid Bond, Agreement, Performance Bond, Labor and Material Bond, Plans, General Conditions, Special Provisions and Specifications, and any addenda thereto (collectively, the "Contract Documents").

6. **ATTORNEYS' FEES:** In the event any action is commenced to enforce or interpret the terms or conditions of this Contract, or the Contract Documents, the prevailing Party in such action, in addition to any costs and other relief, shall be entitled to recover its reasonable attorneys' fees, including fees for use of in-house counsel by a Party.

7. **RESOLUTION OF CONSTRUCTION CLAIMS:** Claims by Contractor in the amount of three hundred seventy five thousand dollars ($375,000) or less shall be made by Contractor and processed by the City pursuant to the provisions of Part 3, Chapter 1, Article 1.5 of the Public Contract Code (commencing with Section 20104). All claims shall be in writing and include the documents necessary to substantiate the claim. Nothing in subdivision (a) of Public Contract Code

Section 20104.2 shall extend the time limit or supersede the notice requirements provided in this case from filing claims by Contractor.

8. **ELIGIBILITY OF CONTRACTOR/SUBCONTRACTOR:** Contractor and all of its subcontractors shall abide by California Public Contract Code, Section 6109, and California Labor Code Sections 1777.1 and/or 1777.7, and certify that they are not debarred and are eligible to work on this project.

9. **ASSIGNMENT OF AGREEMENT:** No assignment by a Party of any rights or interests under this Contract shall be binding on another Party without the written consent of the Party sought to be bound.

10. **SUCCESSORS AND ASSIGNS:** City and Contractor each binds itself and their respective successors and assigns in respect to all covenants, agreements, and obligations contained in the Contract Documents.

11. **SEVERABILITY:** Any provision or part of the Contract Documents held to be void or unenforceable under any law or regulation shall be deemed stricken, and all remaining provisions shall continue to be valid and binding upon City and Contractor.

IN WITNESS WHEREOF, the Parties hereto have executed this Contract the day and year first written above.

CITY OF REDLANDS

(SEAL)

By:_____
Paul T. Barich, Mayor

ATTEST:

_____
Jeanne Donaldson, City Clerk

(SEAL)

_____
Name of Contractor

By:_____
Signature of Authorized Agent

_____
Title

_____
Signature of Authorized Agent (if necessary)

_____
Title

_____
Contractor's License No.

L:\ca\djm\Agreements\Borden Excavating Contract.PW-3.1.FY21-0072.doc.jn

WORKER'S COMPENSATION INSURANCE CERTIFICATION

Description of Contract: City of Redlands
Municipal Utilities & Engineering Department
2021 CIP Water Pipeline Replacement Project
Project No. 501039

Every employer, except the State, shall secure the payment of compensation in one or more of the following ways:

a. By being insured against liability to pay compensation by one or more insurers duly authorized to write compensation insurance in this State.
b. By securing from the Director of Industrial Relations, a certificate of consent to self-insure, either as an individual employer, or as one employer in a group of employers, which may be given upon furnishing proof satisfactory to the Director of Industrial Relations of ability to self-insure and to pay any compensation that may become due to his or her employees.

CHECK ONE

_____I am aware of the provisions of Section 3700 of the Labor Code which requires every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and I will comply with such provisions before commencing the performance of the work and activities required or permitted under this Agreement. (Labor Code §1861).

_____I affirm that at all times, in performing the work and activities required or permitted under this Agreement, I shall not employ any person in any manner such that I become subject to the workers' compensation laws of California. However, at any time, if I employ any person such that I become subject to the workers' compensation laws of California, immediately I shall provide the City with a certificate of consent to self-insure, or a certification of workers' compensation insurance.

I certify under penalty of perjury under the laws of the State of California that the information and representations made in this certificate are true and correct.

Dated this _____ day of _____, 2022.

_____
(Contractor)

_____
(Signature)

_____
(Official Title)

(SEAL)

(Labor Code Section 1861 provides that the above certificate must be signed and filed by the Contractor with the Owner prior to performing the work of the contract.)

L:\ca\djm\Agreements\Borden Excavating Contract.PW-3.1.FY21-0072.doc.jn

FAITHFUL PERFORMANCE BOND

Whereas, the City of Redlands ("City"), State of California, and Borden Excavating, Inc. (hereinafter designated as "Principal") have entered into an agreement dated February 1, 2022 ("Agreement") whereby Principal agrees to install and complete certain public improvements (the "Work"), which said Agreement is identified as 2021 CIP Water Pipeline Replacement Project, Project No. 501039 and is hereby referred to and made a part hereof; and

Whereas, said Principal is required under the terms of the Agreement to furnish a bond for the faithful performance of the Work, now, therefore, we, the Principal and, _____, as Surety, are held and firmly bound unto the City in the penal sum of three million five hundred fifty-five thousand dollars ($3,555,000) lawful money of the United States, for the payment of which sum we bind ourselves, and our heirs, successors, executors and administrators, jointly and severally, firmly by these presents.

The condition of this obligation is such that if the above bounded Principal, his or its heirs, executors, administrators, successors or assigns, shall in all things stand to and abide by, and well and truly keep and perform the covenants, conditions and provisions in the Agreement and any alteration thereof made as therein provided, on his or its part, to be kept and performed at the time and in the manner therein specified, and in all respects according to their true intent and meaning, and shall faithfully fulfill the one-year guarantee of all materials and workmanship, and shall defend, indemnify and save harmless the City and its elected officials, officers, agents and employees, as therein stipulated, then this obligation shall become null and void; otherwise it shall be and remain in full force and effect.

As a part of the obligation secured hereby and in addition to the face amount specified therefor, there shall be included costs and reasonable expenses and fees, including reasonable attorneys' fees, incurred by the City in successfully enforcing such obligations, all to be taxed as costs and included in the judgment rendered.

As a condition precedent to the satisfactory completion of the Work, the above obligation shall hold good for a period of one (1) year or longer if required by the Agreement after the acceptance of the work by the City, during which time if the Principal shall fail to make full, complete, and satisfactory repair and replacements and totally protect the City from loss or damage made evident during this period from the date of completion of the Work, and resulting from or caused by defective materials or faulty workmanship, the above obligation in penal sum thereof shall remain in full force and effect. The obligations of Surety hereunder shall continue so long as any obligation of the Principal remains.

Whenever the Principal shall be, and is declared by the City to be, in default under the Agreement, the City having performed the City obligations thereunder, the Surety shall promptly remedy the default, or shall promptly, at the City's option:

1. Complete the Work in accordance with its terms and conditions; or

2. Obtain a bid or bids for completing the Work in accordance with its terms and conditions, and upon determination by Surety of the lowest responsive and responsible bidder, arrange for a contract between such bidder and the City, and make available as work progresses sufficient funds to pay the cost of completion of the Work less the balance of the Agreement price, but not exceeding, including other costs and damages for which Surety may be liable hereunder, the

amount set forth above. The term "balance of the Agreement price," as used in this paragraph, shall mean the total amount payable to the Principal by the City under the Agreement and any modifications thereto, less the amount previously properly paid by the City to the Principal.

Surety expressly agrees that the City may reject any contractor or subcontractor which may be proposed by Surety in fulfillment of its obligations in the event of default by the Principal.

Surety shall not utilize the Principal in completing the Work nor shall Surety accept a bid from the Principal for completion of the Work if the City, when declaring the Principal in default, notifies Surety of the City's objection to the Principal's further participation in the completion of the Work.

No right of action shall accrue on the bond to or for the use of any person or corporation other than the City named herein or the successors or assigns of the City. Any suit under this bond must be instituted within the applicable statute of limitations period.

The said Surety, for value received, hereby stipulates and agrees that no change, extension of time, alteration or addition to the terms of the Agreement or to the work to be performed thereunder or the Specifications accompanying the same shall in any way affect its obligations on this bond, and it does hereby waive notice of any such change, extension of time, alteration or addition to the terms of the Agreement or to the work or to the specifications.

No final settlement between the City and the Principal shall abridge the right of any beneficiary hereunder whose claim may be unsatisfied.

The Principal and Surety agree that if the City is required to engage the services of any attorney in connection with the enforcement of this bond, each shall pay the City's reasonable attorneys' fees incurred, with or without suit, in addition to the above sum.

In witness whereof, this instrument has been duly executed by the Principal and Surety above named, on _____, 2022.

(SEAL)

_____
(Contractor)

_____
(Signature)

(Seal and Notarial Acknowledgment of Surety)

(SEAL)

_____
(Surety)

BY: _____
(Signature)

Address:_____

_____

Telephone ( )_____

L:\ca\djm\Agreements\Borden Excavating Contract.PW-3.1.FY21-0072.doc.jn

LABOR AND MATERIAL BOND

Whereas, the City Council of the City of Redlands, State of California, and Borden Excavating, Inc. (hereinafter designated as "Principal") have entered into an agreement (the "Agreement") whereby Principal agrees to install and complete certain designated public improvements (the "Work"), which said agreement, dated February 1, 2022, and identified as 2021 CIP Water Pipeline Replacement Project, Project No. 501039 is hereby referred to and made a part hereof; and

Whereas, under the terms of the Agreement, Principal is required before commending the performance of the Work, to file a good and sufficient Labor and Material bond with the City of Redlands to secure the claims to which reference is made in Title 3 (commencing with Section 9550) of Part 6 of Division 4 of the Civil Code of the State of California.

Now, therefore, said Principal and the undersigned as corporate surety, are held firmly bound unto the City and all contractors, subcontractors, laborers, material men and other persons employed in the performance of the Agreement and referred to in the aforesaid Code of Civil Procedure in the sum of three million five hundred fifty-five thousand dollars ($3,555,000) for materials furnished or labor thereon of any kind, or for amounts due under the Unemployment Insurance Act with respect to such work or labor, that said surety will pay the same in an amount not exceeding the amount hereinabove set forth, and also in case suit is brought upon this bond, will pay, in addition to the face amount thereof, costs and reasonable expenses and fees, including reasonable attorneys' fees, incurred by the City in successfully enforcing such obligation, to be awarded and fixed by the court, and to be taxed as costs and to be included in the judgment therein rendered.

It is hereby expressly stipulated and agreed that this bond shall insure to the benefit of any and all persons, companies and corporations entitled to file claims under Title 3 (commencing with Section 9550) of Part 6 of Division 4 of the Civil Code, so as to give a right of action to them or their assigns in any suit brought upon this bond.

Should the condition of this bond be fully performed, then this obligation shall become null and void, otherwise it shall be and remain in full force and effect.

The surety hereby stipulates and agrees that no change, extension of time, alteration or addition to the terms of the Agreement or the specifications accompanying the same shall in any manner affect its obligations on this bond, and it does hereby waive notice of any such change, extension of time, alteration or addition.

In witness whereof, this instrument has been duly executed by the Principal and surety above named, on _____, 2022.

(SEAL)	(SEAL)
_____	_____
(Contractor)	(Surety)
	BY:
_____	_____
(Signature)	(Signature)
	Address:_____
(Seal and Notarial Acknowledgement of Surety)	_____
	Telephone: ( )_____

L:\ca\djm\Agreements\Borden Excavating Contract.PW-3.1.FY21-0072.doc.jn

CITY OF REDLANDS
OFFICE OF THE CITY CLERK
CORRECTED BID OPENING REPORT

The following bids were opened on the **15th Day of December 2021 at 2:00 p.m.** on behalf of the Municipal Utilities and Engineering Department for **2021 CIP Water Pipeline Replacement, Project No. 501039**. The bid amounts have not been checked and are subject to correction after the bids have been completely reviewed.

No.	Plan Holder's Name	Bid Signed	Bid Bond	Addenda Acknowledged (N/A)	Total Bid Amount
1	Borden Excavation, Inc., Calimesa CA	Yes	Yes	N/A	$3,555,000.00
2	MCC Equipment Rentals, Inc., Yucaipa CA	Yes	Yes	N/A	$3,677,352.48
3	Tryco General Engineering, Rimforest CA	Yes	Yes	N/A	$3,684,204.00
4	The Van Dyke Corporation, Twentynine Palms CA	Yes	Yes	N/A	$3,852,307.00
5	All Cities Engineering, Jurupa Valley, CA	Yes	Yes	N/A	$3,989,677.50
6	Dominquez General Engineering, Inc., Pomona CA	Yes	Yes	N/A	$4,567,588.00
7	E.J. Meyer Company, Highland CA	Yes	Yes	N/A	$4,688,888.00
8	Kirtley Construction dba TK Construction, San Bernardino CA	Yes	Yes	N/A	$4,695,237.00
9	Christensen Brothers General Engineering Inc., Apple Valley CA	Yes	Yes	N/A	$6,144,414.00
10	Weka, Inc., Highland CA	Yes	Yes	N/A	$6,165,912.00
11	J.R. Filanc Construction Company, Escondido, CA	Yes	Yes	N/A	$7,482,608.00

Jeanne Donaldson, City Clerk
City of Redlands, California

Emailed: Councilmembers,
City Manager, City Treasurer, PIO, Press
Department Head: John Harris
Staff: Gerard Nepomuceno; Goutam Dobey

ATTACHMENT "C"

CITY OF REDLANDS
MUNICIPAL UTILITIES AND ENGINEERING DEPARTMENT
Bid Analysis

PROJECT No.: 501039 — Bid Date: 12/15/2021

2021 CIP Water Pipeline Replacement Project — Estimated Start Date: 2/15/2022

Item No.	Bid Item	Qty	Unit	Borden Excavating Inc.		MCC Equipment Rentals		Tryco General Engineering	
				Unit Price	Item Price	Unit Price	Item Price	Unit Price	Item Price
1	Mobilization (Max. 5% of Total Bid)	1	LS	$3,216.00	$3,216.00	$131,349.43	$131,349.43	$100,000.00	$100,000.00
2	SWPPP	1	LS	$2,500.00	$2,500.00	$8,053.25	$8,053.25	$4,000.00	$4,000.00
3	Traffic Control Plan	1	LS	$5,000.00	$5,000.00	$3,987.25	$3,987.25	$6,000.00	$6,000.00
4	Construction Survey	1	LS	$15,000.00	$15,000.00	$10,700.00	$10,700.00	$3,000.00	$3,000.00
5	8" DIP Water Pipeline	19,044	LF	$101.00	$1,923,444.00	$103.26	$1,966,483.44	$104.00	$1,980,576.00
6	12" DIP Water Pipeline	757	LF	$120.00	$90,840.00	$135.03	$102,217.71	$104.00	$78,728.00
7	8" Gate Valve	42	EA	$2,000.00	$84,000.00	$1,958.46	$82,255.32	$1,980.00	$83,160.00
8	12" Gate Valve	12	EA	$3,500.00	$42,000.00	$3,555.81	$42,669.72	$3,480.00	$41,760.00
9	Fire Hydrant	23	EA	$8,000.00	$184,000.00	$8,514.42	$195,831.66	$7,280.00	$167,440.00
10	Fire Hydrant w/ Check Valve	3	EA	$9,500.00	$28,500.00	$11,154.45	$33,463.35	$9,800.00	$29,400.00
11	1" Service to Existing Meter	306	EA	$2,000.00	$612,000.00	$1,701.76	$520,738.56	$2,200.00	$673,200.00
12	Drop Section	25	EA	$2,000.00	$50,000.00	$1,868.80	$46,720.00	$1,400.00	$35,000.00
13	Air and Vacuum	1	EA	$4,500.00	$4,500.00	$7,564.81	$7,564.81	$3,980.00	$3,980.00
14	Connection per Detail 1, Sheet 6	1	EA	$4,000.00	$4,000.00	$3,177.99	$3,177.99	$2,980.00	$2,980.00
15	Connection per Detail 2, Sheet 6	1	EA	$3,000.00	$3,000.00	$4,453.32	$4,453.32	$2,680.00	$2,680.00
16	Connection per Detail 3, Sheet 6	1	EA	$3,000.00	$3,000.00	$4,450.11	$4,450.11	$2,180.00	$2,180.00
17	Connection per Detail 1, Sheet 7	1	EA	$3,000.00	$3,000.00	$4,450.11	$4,450.11	$1,980.00	$1,980.00
18	Connection per Detail 1, Sheet 8	1	EA	$10,500.00	$10,500.00	$6,957.12	$6,957.12	$6,880.00	$6,880.00
19	Connection per Detail 1, Sheet 9	1	EA	$6,500.00	$6,500.00	$5,921.36	$5,921.36	$6,800.00	$6,800.00
20	Connection per Detail 2, Sheet 9	1	EA	$7,000.00	$7,000.00	$6,957.12	$6,957.12	$6,200.00	$6,200.00
21	Connection per Detail 1, Sheet 10	1	EA	$5,000.00	$5,000.00	$4,961.57	$4,961.57	$2,100.00	$2,100.00
22	Connection per Detail 1, Sheet 11	1	EA	$4,000.00	$4,000.00	$4,450.11	$4,450.11	$1,980.00	$1,980.00
23	Connection per Detail 2, Sheet 11	1	EA	$4,000.00	$4,000.00	$5,294.34	$5,294.34	$1,980.00	$1,980.00
24	Connection per Detail 3, Sheet 11	1	EA	$4,500.00	$4,500.00	$4,545.34	$4,545.34	$2,180.00	$2,180.00
25	Connection per Detail 1, Sheet 12	1	EA	$3,500.00	$3,500.00	$4,736.87	$4,736.87	$2,200.00	$2,200.00
26	Connection per Detail 2, Sheet 12	1	EA	$5,000.00	$5,000.00	$5,378.87	$5,378.87	$2,800.00	$2,800.00
27	Connection per Detail 3, Sheet 12	1	EA	$6,000.00	$6,000.00	$5,378.87	$5,378.87	$5,600.00	$5,600.00
28	Connection per Detail 1, Sheet 13	1	EA	$3,500.00	$3,500.00	$4,447.97	$4,447.97	$2,980.00	$2,980.00
29	Connection per Detail 1, Sheet 14	1	EA	$3,500.00	$3,500.00	$4,453.32	$4,453.32	$2,980.00	$2,980.00
30	Connection per Detail 2, Sheet 14	1	EA	$4,500.00	$4,500.00	$4,736.87	$4,736.87	$3,280.00	$3,280.00
31	Connection per Detail 3, Sheet 14	1	EA	$4,500.00	$4,500.00	$5,271.87	$5,271.87	$4,980.00	$4,980.00
32	Connection per Detail 4, Sheet 14	1	EA	$4,500.00	$4,500.00	$5,485.87	$5,485.87	$3,980.00	$3,980.00
33	Connection per Detail 1, Sheet 15	1	EA	$4,500.00	$4,500.00	$5,485.87	$5,485.87	$3,280.00	$3,280.00
34	Connection per Detail 1, Sheet 16	1	EA	$3,500.00	$3,500.00	$4,201.87	$4,201.87	$1,480.00	$1,480.00
35	Connection per Detail 2, Sheet 16	1	EA	$7,500.00	$7,500.00	$5,753.37	$5,753.37	$2,980.00	$2,980.00
36	Connection per Detail 1, Sheet 17	1	EA	$3,500.00	$3,500.00	$4,201.87	$4,201.87	$1,480.00	$1,480.00
37	Unforeseen work not covered within all other bid items	1	LS	$400,000.00	$400,000.00	$400,000.00	$400,000.00	$400,000.00	$400,000.00
38	Demobilization	1	LS	$1,500.00	$1,500.00	$10,700.00	$10,700.00	$2,000.00	$2,000.00
	Additions/Deductions								
			Total Bid Price		**$3,555,000.00**		**$3,677,886.48**		**$3,684,204.00**

Multiplication Error on Bid Items 6,12 and 26 ; Totals are corrected per item unit price

Low Bidder 1, 2 & 3

CITY OF REDLANDS
MUNICIPAL UTILITIES AND ENGINEERING DEPARTMENT
Bid Analysis

PROJECT No.: 501039 — Bid Date: 12/15/2021

2021 CIP Water Pipeline Replacement Project — Estimated Start Date: 2/15/2022

Item No.	Bid Item	Qty	Unit	The Van Dyke Corporation		All Cities Engineering Inc.		Dominguez General Engineering, Inc.	
				Unit Price	Item Price	Unit Price	Item Price	Unit Price	Item Price
1	Mobilization (Max. 5% of Total Bid)	1	LS	$75,000.00	$75,000.00	$100,000.00	$100,000.00	$30,000.00	$30,000.00
2	SWPPP	1	LS	$8,500.00	$8,500.00	$40,000.00	$40,000.00	$5,000.00	$5,000.00
3	Traffic Control Plan	1	LS	$9,000.00	$9,000.00	$50,000.00	$50,000.00	$10,000.00	$10,000.00
4	Construction Survey	1	LS	$28,000.00	$28,000.00	$25,000.00	$25,000.00	$28,000.00	$28,000.00
5	8" DIP Water Pipeline	19,044	LF	$65.00	$1,237,860.00	$110.00	$2,094,840.00	$138.00	$2,628,072.00
6	12" DIP Water Pipeline	757	LF	$115.00	$87,055.00	$137.50	$104,087.50	$188.00	$142,316.00
7	8" Gate Valve	42	EA	$2,315.00	$97,230.00	$1,800.00	$75,600.00	$1,800.00	$75,600.00
8	12" Gate Valve	12	EA	$4,600.00	$55,200.00	$2,500.00	$30,000.00	$3,100.00	$37,200.00
9	Fire Hydrant	23	EA	$9,000.00	$207,000.00	$7,000.00	$161,000.00	$11,000.00	$253,000.00
10	Fire Hydrant w/ Check Valve	3	EA	$11,000.00	$33,000.00	$8,500.00	$25,500.00	$13,500.00	$40,500.00
11	1" Service to Existing Meter	306	EA	$4,000.00	$1,224,000.00	$2,200.00	$673,200.00	$2,400.00	$734,400.00
12	Drop Section	25	EA	$2,500.00	$62,500.00	$2,500.00	$62,500.00	$1,400.00	$35,000.00
13	Air and Vacuum	1	EA	$6,000.00	$6,000.00	$5,500.00	$5,500.00	$9,000.00	$9,000.00
14	Connection per Detail 1, Sheet 6	1	EA	$3,600.00	$3,600.00	$6,700.00	$6,700.00	$4,500.00	$4,500.00
15	Connection per Detail 2, Sheet 6	1	EA	$2,700.00	$2,700.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
16	Connection per Detail 3, Sheet 6	1	EA	$2,700.00	$2,700.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
17	Connection per Detail 1, Sheet 7	1	EA	$2,700.00	$2,700.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
18	Connection per Detail 1, Sheet 8	1	EA	$12,850.00	$12,850.00	$8,500.00	$8,500.00	$7,500.00	$7,500.00
19	Connection per Detail 1, Sheet 9	1	EA	$7,500.00	$7,500.00	$8,480.00	$8,480.00	$7,500.00	$7,500.00
20	Connection per Detail 2, Sheet 9	1	EA	$12,850.00	$12,850.00	$8,000.00	$8,000.00	$7,500.00	$7,500.00
21	Connection per Detail 1, Sheet 10	1	EA	$3,600.00	$3,600.00	$5,000.00	$5,000.00	$5,000.00	$5,000.00
22	Connection per Detail 1, Sheet 11	1	EA	$3,600.00	$3,600.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
23	Connection per Detail 2, Sheet 11	1	EA	$2,600.00	$2,600.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
24	Connection per Detail 3, Sheet 11	1	EA	$3,400.00	$3,400.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
25	Connection per Detail 1, Sheet 12	1	EA	$1,700.00	$1,700.00	$7,800.00	$7,800.00	$6,000.00	$6,000.00
26	Connection per Detail 2, Sheet 12	1	EA	$4,300.00	$4,300.00	$7,500.00	$7,500.00	$6,000.00	$6,000.00
27	Connection per Detail 3, Sheet 12	1	EA	$6,200.00	$6,200.00	$5,000.00	$5,000.00	$8,000.00	$8,000.00
28	Connection per Detail 1, Sheet 13	1	EA	$2,700.00	$2,700.00	$5,000.00	$5,000.00	$4,500.00	$4,500.00
29	Connection per Detail 1, Sheet 14	1	EA	$2,700.00	$2,700.00	$6,000.00	$6,000.00	$4,500.00	$4,500.00
30	Connection per Detail 2, Sheet 14	1	EA	$4,600.00	$4,600.00	$6,000.00	$6,000.00	$6,500.00	$6,500.00
31	Connection per Detail 3, Sheet 14	1	EA	$5,800.00	$5,800.00	$8,500.00	$8,500.00	$8,500.00	$8,500.00
32	Connection per Detail 4, Sheet 14	1	EA	$3,800.00	$3,800.00	$5,000.00	$5,000.00	$6,500.00	$6,500.00
33	Connection per Detail 1, Sheet 15	1	EA	$4,400.00	$4,400.00	$5,000.00	$5,000.00	$6,500.00	$6,500.00
34	Connection per Detail 1, Sheet 16	1	EA	$4,000.00	$4,000.00	$6,000.00	$6,000.00	$4,500.00	$4,500.00
35	Connection per Detail 2, Sheet 16	1	EA	$10,200.00	$10,200.00	$8,000.00	$8,000.00	$12,000.00	$12,000.00
36	Connection per Detail 1, Sheet 17	1	EA	$3,400.00	$3,400.00	$6,000.00	$6,000.00	$5,000.00	$5,000.00
37	Unforeseen work not covered within all other bid items	1	LS	$400,000.00	$400,000.00	$400,000.00	$400,000.00	$400,000.00	$400,000.00
38	Demobilization	1	LS	$10,000.00	$10,000.00	$100,000.00	$100,000.00	$2,000.00	$2,000.00
	Additions/Deductions			$200,062.00	$200,062.00				
			Total Bid Price		**$3,852,307.00**		**$4,089,707.50**		**$4,567,588.00**
						Summation error in total bid price stated; Total price corrected per bid item unit price			

Low Bidder 4, 5 & 6

CITY OF REDLANDS
MUNICIPAL UTILITIES AND ENGINEERING DEPARTMENT
Bid Analysis

PROJECT No.: 501039 | Bid Date: 12/15/2021
2021 CIP Water Pipeline Replacement Project | Estimated Start Date: 2/15/2022

Item No.	Bid Item	Qty	Unit	EJ Meyer Company		Kirtley Construction, Inc		Christensen Brothers General Engineering, Inc.	
				Unit Price	Item Price	Unit Price	Item Price	Unit Price	Item Price
1	Mobilization (Max. 5% of Total Bid)	1	LS	$220,395.00	$220,395.00	$86,000.00	$86,000.00	$141,000.00	$141,000.00
2	SWPPP	1	LS	$10,000.00	$10,000.00	$14,000.00	$14,000.00	$32,000.00	$32,000.00
3	Traffic Control Plan	1	LS	$40,000.00	$40,000.00	$45,000.00	$45,000.00	$74,000.00	$74,000.00
4	Construction Survey	1	LS	$25,000.00	$25,000.00	$25,000.00	$25,000.00	$25,000.00	$25,000.00
5	8" DIP Water Pipeline	19,044	LF	$118.00	$2,247,192.00	$128.00	$2,437,632.00	$176.00	$3,351,744.00
6	12" DIP Water Pipeline	757	LF	$193.00	$146,101.00	$165.00	$124,905.00	$510.00	$386,070.00
7	8" Gate Valve	42	EA	$2,500.00	$105,000.00	$1,700.00	$71,400.00	$2,440.00	$102,480.00
8	12" Gate Valve	12	EA	$4,200.00	$50,400.00	$2,900.00	$34,800.00	$4,200.00	$50,400.00
9	Fire Hydrant	23	EA	$11,000.00	$253,000.00	$8,300.00	$190,900.00	$12,300.00	$282,900.00
10	Fire Hydrant w/ Check Valve	3	EA	$14,000.00	$42,000.00	$10,000.00	$30,000.00	$16,700.00	$50,100.00
11	1" Service to Existing Meter	306	EA	$2,800.00	$856,800.00	$3,000.00	$918,000.00	$3,070.00	$939,420.00
12	Drop Section	25	EA	$5,000.00	$125,000.00	$5,900.00	$147,500.00	$6,900.00	$172,500.00
13	Air and Vacuum	1	EA	$11,000.00	$11,000.00	$7,400.00	$7,400.00	$7,800.00	$7,800.00
14	Connection per Detail 1, Sheet 6	1	EA	$4,000.00	$4,000.00	$4,300.00	$4,300.00	$4,800.00	$4,800.00
15	Connection per Detail 2, Sheet 6	1	EA	$4,000.00	$4,000.00	$2,100.00	$2,100.00	$4,800.00	$4,800.00
16	Connection per Detail 3, Sheet 6	1	EA	$4,000.00	$4,000.00	$2,100.00	$2,100.00	$4,800.00	$4,800.00
17	Connection per Detail 1, Sheet 7	1	EA	$4,000.00	$4,000.00	$2,500.00	$2,500.00	$4,800.00	$4,800.00
18	Connection per Detail 1, Sheet 8	1	EA	$23,000.00	$23,000.00	$12,600.00	$12,600.00	$4,800.00	$4,800.00
19	Connection per Detail 1, Sheet 9	1	EA	$13,000.00	$13,000.00	$9,000.00	$9,000.00	$5,000.00	$5,000.00
20	Connection per Detail 2, Sheet 9	1	EA	$23,000.00	$23,000.00	$5,600.00	$5,600.00	$5,000.00	$5,000.00
21	Connection per Detail 1, Sheet 10	1	EA	$4,000.00	$4,000.00	$5,000.00	$5,000.00	$5,000.00	$5,000.00
22	Connection per Detail 1, Sheet 11	1	EA	$4,000.00	$4,000.00	$5,000.00	$5,000.00	$5,000.00	$5,000.00
23	Connection per Detail 2, Sheet 11	1	EA	$4,000.00	$4,000.00	$4,900.00	$4,900.00	$5,000.00	$5,000.00
24	Connection per Detail 3, Sheet 11	1	EA	$4,000.00	$4,000.00	$8,800.00	$8,800.00	$5,000.00	$5,000.00
25	Connection per Detail 1, Sheet 12	1	EA	$1,000.00	$1,000.00	$6,500.00	$6,500.00	$5,000.00	$5,000.00
26	Connection per Detail 2, Sheet 12	1	EA	$4,000.00	$4,000.00	$10,400.00	$10,400.00	$5,000.00	$5,000.00
27	Connection per Detail 3, Sheet 12	1	EA	$5,000.00	$5,000.00	$8,700.00	$8,700.00	$5,000.00	$5,000.00
28	Connection per Detail 1, Sheet 13	1	EA	$4,000.00	$4,000.00	$5,000.00	$5,000.00	$5,000.00	$5,000.00
29	Connection per Detail 1, Sheet 14	1	EA	$4,000.00	$4,000.00	$5,000.00	$5,000.00	$5,000.00	$5,000.00
30	Connection per Detail 2, Sheet 14	1	EA	$4,000.00	$4,000.00	$9,100.00	$9,100.00	$5,000.00	$5,000.00
31	Connection per Detail 3, Sheet 14	1	EA	$5,000.00	$5,000.00	$8,500.00	$8,500.00	$5,000.00	$5,000.00
32	Connection per Detail 4, Sheet 14	1	EA	$5,000.00	$5,000.00	$7,800.00	$7,800.00	$5,000.00	$5,000.00
33	Connection per Detail 1, Sheet 15	1	EA	$5,000.00	$5,000.00	$7,000.00	$7,000.00	$5,000.00	$5,000.00
34	Connection per Detail 1, Sheet 16	1	EA	$4,000.00	$4,000.00	$7,000.00	$7,000.00	$5,000.00	$5,000.00
35	Connection per Detail 2, Sheet 16	1	EA	$16,000.00	$16,000.00	$10,200.00	$10,200.00	$5,000.00	$5,000.00
36	Connection per Detail 1, Sheet 17	1	EA	$4,000.00	$4,000.00	$7,600.00	$7,600.00	$5,000.00	$5,000.00
37	Unforeseen work not covered within all other bid items	1	LS	$400,000.00	$400,000.00	$400,000.00	$400,000.00	$400,000.00	$400,000.00
38	Demobilization	1	LS	$5,000.00	$5,000.00	$8,000.00	$8,000.00	$15,000.00	$15,000.00
	Additions/Deductions								
			Total Bid Price		**$4,688,888.00**		**$4,695,237.00**		**$6,144,414.00**

Low Bidder 7, 8 & 9
Page 3 of 4

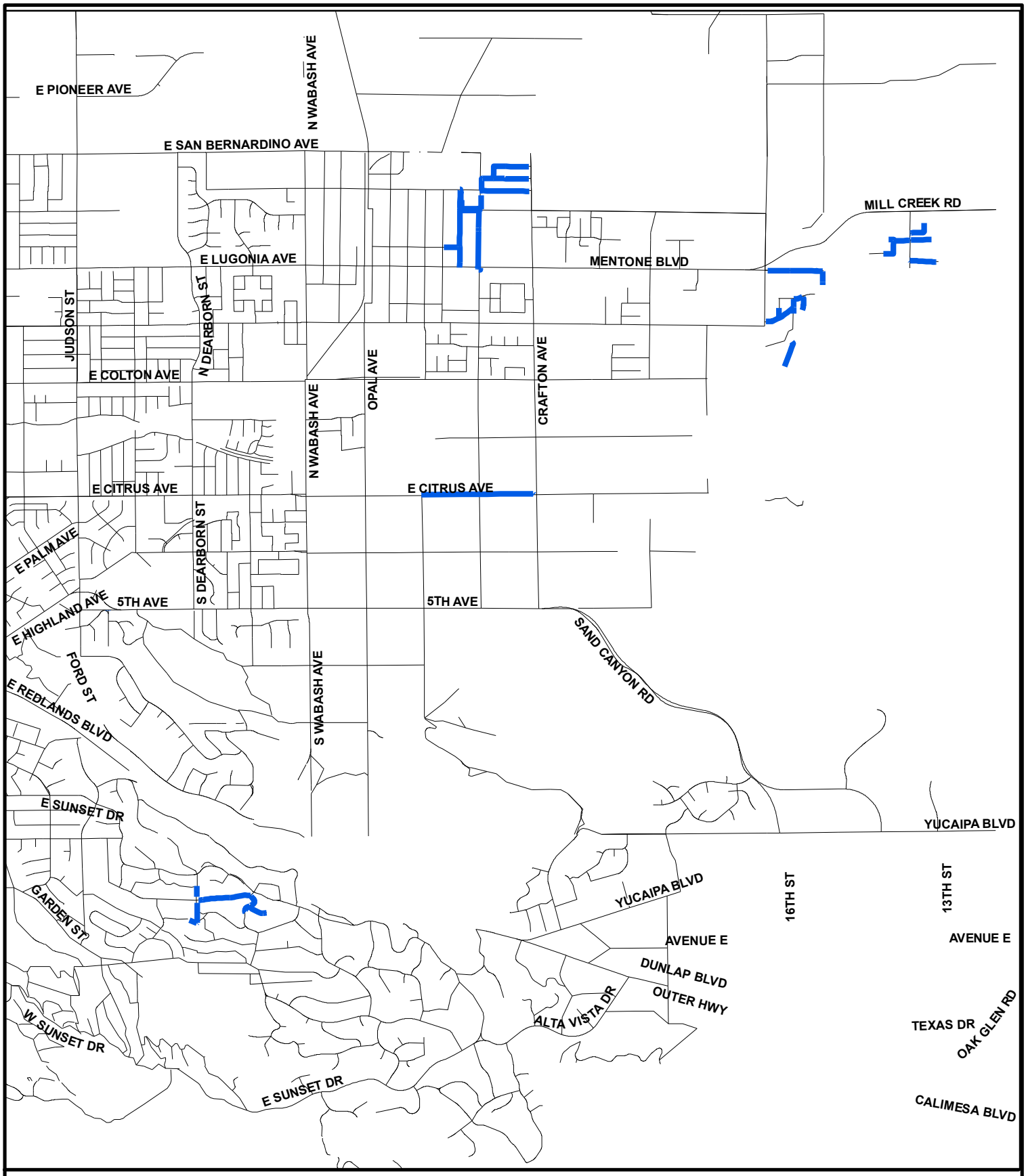
CITY OF REDLANDS
MUNICIPAL UTILITIES AND ENGINEERING DEPARTMENT
Bid Analysis

PROJECT No.: 501039 | Bid Date: 12/15/2021
2021 CIP Water Pipeline Replacement Project | Estimated Start Date: 2/15/2022

Item No.	Bid Item	Qty	Unit	Weka Inc.		J.R. Filanc Construction Company, Inc.			
				Unit Price	Item Price	Unit Price	Item Price	Unit Price	Item Price
1	Mobilization (Max. 5% of Total Bid)	1	LS	$301,472.00	$301,472.00	$350,000.00	$350,000.00		
2	SWPPP	1	LS	$10,000.00	$10,000.00	$45,000.00	$45,000.00		
3	Traffic Control Plan	1	LS	$60,000.00	$60,000.00	$25,000.00	$25,000.00		
4	Construction Survey	1	LS	$30,000.00	$30,000.00	$75,000.00	$75,000.00		
5	8" DIP Water Pipeline	19,044	LF	$200.00	$3,808,800.00	$234.00	$4,456,296.00		
6	12" DIP Water Pipeline	757	LF	$220.00	$166,540.00	$267.00	$202,119.00		
7	8" Gate Valve	42	EA	$2,000.00	$84,000.00	$3,900.00	$163,800.00		
8	12" Gate Valve	12	EA	$3,200.00	$38,400.00	$5,500.00	$66,000.00		
9	Fire Hydrant	23	EA	$11,000.00	$253,000.00	$16,000.00	$368,000.00		
10	Fire Hydrant w/ Check Valve	3	EA	$12,000.00	$36,000.00	$15,000.00	$45,000.00		
11	1" Service to Existing Meter	306	EA	$2,450.00	$749,700.00	$3,100.00	$948,600.00		
12	Drop Section	25	EA	$1,800.00	$45,000.00	$6,700.00	$167,500.00		
13	Air and Vacuum	1	EA	$8,000.00	$8,000.00	$5,700.00	$5,700.00		
14	Connection per Detail 1, Sheet 6	1	EA	$5,000.00	$5,000.00	$8,000.00	$8,000.00		
15	Connection per Detail 2, Sheet 6	1	EA	$5,000.00	$5,000.00	$7,100.00	$7,100.00		
16	Connection per Detail 3, Sheet 6	1	EA	$5,000.00	$5,000.00	$7,100.00	$7,100.00		
17	Connection per Detail 1, Sheet 7	1	EA	$5,000.00	$5,000.00	$7,100.00	$7,100.00		
18	Connection per Detail 1, Sheet 8	1	EA	$14,000.00	$14,000.00	$11,000.00	$11,000.00		
19	Connection per Detail 1, Sheet 9	1	EA	$12,000.00	$12,000.00	$9,800.00	$9,800.00		
20	Connection per Detail 2, Sheet 9	1	EA	$14,000.00	$14,000.00	$9,700.00	$9,700.00		
21	Connection per Detail 1, Sheet 10	1	EA	$6,000.00	$6,000.00	$8,000.00	$8,000.00		
22	Connection per Detail 1, Sheet 11	1	EA	$5,000.00	$5,000.00	$7,100.00	$7,100.00		
23	Connection per Detail 2, Sheet 11	1	EA	$5,000.00	$5,000.00	$7,200.00	$7,200.00		
24	Connection per Detail 3, Sheet 11	1	EA	$6,500.00	$6,500.00	$8,400.00	$8,400.00		
25	Connection per Detail 1, Sheet 12	1	EA	$5,000.00	$5,000.00	$6,200.00	$6,200.00		
26	Connection per Detail 2, Sheet 12	1	EA	$8,500.00	$8,500.00	$8,300.00	$8,300.00		
27	Connection per Detail 3, Sheet 12	1	EA	$9,000.00	$9,000.00	$10,100.00	$10,100.00		
28	Connection per Detail 1, Sheet 13	1	EA	$5,000.00	$5,000.00	$5,500.00	$5,500.00		
29	Connection per Detail 1, Sheet 14	1	EA	$5,000.00	$5,000.00	$5,500.00	$5,500.00		
30	Connection per Detail 2, Sheet 14	1	EA	$7,500.00	$7,500.00	$10,000.00	$10,000.00		
31	Connection per Detail 3, Sheet 14	1	EA	$7,000.00	$7,000.00	$11,000.00	$11,000.00		
32	Connection per Detail 4, Sheet 14	1	EA	$8,000.00	$8,000.00	$10,000.00	$10,000.00		
33	Connection per Detail 1, Sheet 15	1	EA	$7,500.00	$7,500.00	$9,800.00	$9,800.00		
34	Connection per Detail 1, Sheet 16	1	EA	$5,000.00	$5,000.00	$5,100.00	$5,100.00		
35	Connection per Detail 2, Sheet 16	1	EA	$10,000.00	$10,000.00	$10,600.00	$10,600.00		
36	Connection per Detail 1, Sheet 17	1	EA	$5,000.00	$5,000.00	$5,100.00	$5,100.00		
37	Unforeseen work not covered within all other bid items	1	LS	$400,000.00	$400,000.00	$400,000.00	$400,000.00		
38	Demobilization	1	LS	$10,000.00	$10,000.00	$25,000.00	$25,000.00		
	Additions/Deductions					-$88,107.00	-$88,107.00		
	Total Bid Price				**$6,165,912.00**		**$7,442,608.00**		

Summation error in total bid price stated; Total price corrected per bid item unit price

Low Bidder 10 & 11



PROPOSED WATER PIPELINE REPLACEMENT

2021 CIP WATER PIPELINE REPLACEMENT PROJECT LOCATION MAP

City of REDLANDS "A City That Works"

N W E S

"A City That Works"

City Council/Successor Agency Meeting **L. 6.**

DATE: 02/01/2022

TO: Honorable Mayor and City Council Members

SUBJECT: Consideration of an Amendment to the City's Cooperative Agreement with San Bernardino County Transportation Authority for the Interstate 10 at University Street Interchange project; approval of an additional appropriation in the amount of $137,830; and determine approval of this Amendment is exempt from environmental review pursuant to Section 15061(b)(3) of the State's Guidelines implementing the California Environmental Quality Act (Municipal Utilities and Engineering Director Harris)

MOTION(S):

If the City Council determines that staff's recommendation is appropriate, the following motions are provided:

1. I move that the City Council determine approval of the amendment to the Cooperative Agreement with San Bernardino County Transportation Authority for the Interstate 10 at University Street Interchange Project is exempt from environmental review pursuant to Section 15061(b)(3) of the State's Guidelines implementing the California Environmental Quality Act; and

2. I move that the City Council approve the amendment to Cooperative Agreement with San Bernardino County Transportation Authority for the I-10 University Interchange Project, and

3. I move to approve an additional appropriation of $137,830.

RECOMMENDATION:

Staff recommends City Council determine approval of the amendment to the Cooperative Agreement with San Bernardino County Transportation Authority for the Interstate 10 at University Street Interchange Project is exempt from environmental review pursuant to Section 15061(b)(3) of the State's Guidelines implementing the California Environmental Quality Act and approve the

amendment to the Cooperative Agreement with San Bernardino County Transportation Authority and appropriate additional funding in the amount of $137,830.

DISCUSSION:

In January 2014, City Council approved a Cooperative Agreement with San Bernardino County Transportation Authority (SBCTA) to define the roles and responsibilities for the design and construction of the Interstate 10 at University Street Interchange Project (Project). The Project is located between Citrus Avenue and Central Avenue, and will widen the on and off ramps, add turning lanes, install traffic signals and construct operational improvements within the existing right-of-way. The initial cost estimate to design and construct the Project was $5.2 million. Pursuant to the Cooperative Agreement, the City is responsible for 17.9% ($912,900) of the total $5.1 million project cost, with the remaining 82.1% ($4,188,000) to be funded by SBCTA. The remaining $100,000 is for project management costs that is the sole responsibility of the City.

In May 2019, SBCTA informed the City that an amendment to the Cooperative Agreement would be needed as the total project cost for the Project had increased from $5.2 million to $5,812,935. This increase was due to the following:

- Planning and Design stage costs increased from $700,000 to $969,807. SBCTA indicated cost increases were a result of changes in the project scope, such as additional Caltrans requirements and modifications to the traffic signal design. In accordance with the Cooperative Agreement, the City's share increased to $173,595, an increase of $48,295.

- Project management costs increased to $345,000. In accordance with the Cooperative Agreement, the City is solely responsible for project management costs.

- On August 15, 2019, SBCTA provided an update regarding additional University Street pavement improvements required by Caltrans. These upgrades are estimated to cost $380,000, and Caltrans indicated they would contribute $500,000 toward construction of the Project. As a result, the City's share of construction costs decreased from $787,600 to $715,665, a decrease of $71,935.

This increased the City's total Project financial obligation by $221,360. In accordance with the Cooperative Agreement, the total City Project contribution cannot exceed $1,012,900 without executing an amendment to the Cooperative Agreement. On May 19, 2020, City Council approved amendment number 1, increasing the City's Project financial obligation by $221,360. On December

16, 2021, SBCTA requested the approval of $770,000 in additional contingency funding to offset the cost for unanticipated construction elements. The City's financial obligation for this request (17.9%) is $137,830. Approval of this request is reasonable and necessary to avoid delay-related construction costs in the future, and requires a second amendment to the Project Cooperative Agreement.

Approval of the amendment to the Cooperative Agreement is exempt from environmental review pursuant to Section 15061(b)(3) of the State's Guidelines implementing the California Environmental Quality Act.

ALTERNATIVES:

City Council may decline to sign the amendment to the Cooperative Agreement for Interstate 10 at University Interchange Project.

STRATEGIC PLAN:
Not applicable.

SUBMITTED BY:
John R. Harris, Municipal Utilities and Engineering Director

RECOMMENDED BY:
Charles M. Duggan, Jr., City Manager

REVIEWED BY:
Daniel J. McHugh, City Attorney
Janice McConnell, Assistant City Manager
Danielle Garcia, Management Services/Finance Director

PREPARED BY:
Goutam K. Dobey, Engineering Manager

Fiscal Impact

Fiscal Year:	FY 2021-22
Appropriation Required Y/N:	Yes
Amount:	$137,830
Budgeted Y/N:	No
Account No.:	254
Discussion:	

Approval of the second amendment to this Cooperative Agreement requires an additional appropriation of $137,830 from the Freeway Interchange Fund, which currently has a balance of approximately $3,000,000.

Attachments

Cooperative Agreement Second Amendment with SBCTA

Additional Appropriation Form

Cooperative Agreement R14088

Cooperative Agreement R14088 First Amendment

AMENDMENT NO. 2

TO COOPERATIVE AGREEMENT NO. R14088

BETWEEN

SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

AND

CITY OF REDLANDS

FOR

PLANNING, PROJECT REPORT AND ENVIRONMENTAL DOCUMENT, PLANS, SPECIFICATIONS AND ESTIMATE (PS&E), RIGHT-OF-WAY (ROW), AND CONSTRUCTION PHASES FOR THE INTERCHANGE AT UNIVERSITY STREET AND INTERSTATE 10 IN THE CITY OF REDLANDS

THIS AMENDMENT No. 2 (AMENDMENT) to the Cooperative Agreement No. R14088 (AGREEMENT) is made and entered into by and between the San Bernardino County Transportation Authority (hereinafter referred to as AUTHORITY) and the City of Redlands (hereinafter referred to as CITY). AUTHORITY and CITY may be referred to herein as a "PARTY" and collectively "PARTIES".

RECITALS

A. AUTHORITY and CITY entered into the AGREEMENT on February 5, 2014, to delineate their respective roles, responsibilities, and funding commitments relative to the Project Management, Planning, Environmental, PS&E, ROW and Construction activities of the Interchange at University Street and Interstate 10 in the City of Redlands (PROJECT); and

B. AUTHORITY and CITY entered into Amendment No. 1 on June 8, 2020; to redefine their respective funding responsibilities based on the revised PROJECT costs, and

C. Due to the construction change orders, an estimated amount of $770,000 needs to be added to the construction contingency to cover the existing and anticipated change orders for the completion of the PROJECT; and

D. The PARTIES desire to amend the AGREEMENT, and its Attachment A, to redefine their respective funding responsibilities based on the revised PROJECT costs and to provide a new, updated, estimated schedule for completion of the PROJECT.

IT IS THEREFORE MUTUALLY AGREED TO AMEND THE AGREEMENT AS FOLLOWS:

1. Section III.C of the AGREEMENT is amended in its entirety to read as follows:

   To contribute towards the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT cost an amount not to exceed $4,710,845, as shown in Attachment A. The actual cost of specific phase may ultimately vary from the estimates provided in Attachment A, however, under no circumstances is the total combined AUTHORITY contribution to exceed $4,710,845 without an amendment to this Agreement.

2. Section IV.A of the AGREEMENT is amended in its entirety to read as follows:

   To reimburse AUTHORITY for the actual costs incurred estimated at $1,027,090 towards the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT cost and $345,000 for AUTHORITY project management for a total amount not to exceed $1,372,090, as shown in Attachment A. The actual cost of a specific phase may ultimately vary from the estimates provided in Attachment A, however, under no circumstances is the total combined CITY contribution to exceed $1,372,090 or AUTHORITY project management costs to exceed $345,000 without an amendment to this Agreement.

3. Attachment A to the AGREEMENT is amended and replaced in its entirety with Attachment A to this AMENDMENT, which is attached to and made a part of this AMENDMENT.

4. PARTIES understand that the PROJECT cost provided in this AMENDMENT is an estimate and there is a potential for cost increases or decreases. If a cost increase becomes apparent, PARTIES agree to work in good faith to amend the AGREEMENT.

5. All other terms and conditions of the AGREEMENT, including all previous amendments, shall remain in full force and effect.

6. This AMENDMENT is deemed to be included and made part of the AGREEMENT.

7. This AMENDMENT is effective upon execution by AUTHORITY.

----------SIGNATURES ON FOLLOWING PAGE----------

SIGNATURE PAGE TO
AMENDMENT NO. 2 TO COOPERATIVE AGREEMENT NO. R14088
BETWEEN
SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY
and CITY OF REDLANDS

SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

By:_____
Curt Hagman
President, Board of Directors

Date:_____

APPROVED AS TO FORM

By:_____
Juanda L. Daniel
Assistant General Counsel

CITY OF REDLANDS

By:_____
Paul T. Barich
Mayor, City of Redlands

Date:_____

APPROVED AS TO FORM AND PROCEDURE:

By:_____
Daniel J. McHugh
City Attorney

ATTEST:

By: _____
Jeanne Donaldson
City Clerk

Attachment A

PROJECT SCOPE

The PROJECT will improve the Interstate 10/University Street interchange ramps, including intersection work, turning lanes and striping. It is anticipated that AUTHORITY will be the lead on all phases of work.

PROJECT COST ESTIMATE AND FUNDING TABLE

Public Share: 82.1%
Nexus Development Impact Fee Share (DIF or "Local Share"): 17.9%
Local Jurisdictional Split of the DIF Share: Redlands 100%
Caltrans Financial Contribution (FCO): Lump Sum $500,000

	Project Cost*	**Public Share****	**DIF Share**	**Caltrans FCO**
Planning, Environmental, Design, and Right-of-way	$969,807	$796,212	$173,595	$0
Construction Management	$488,128	$400,753	$87,375	$0
Construction Capital***	$4,780,000	$3,513,880	$766,120	$500,000
Project Management	$345,000	$0	$345,000	$0
	$6,582,935	**$4,710,845**	**$1,372,090**	**$500,000**

*Project Cost is based on 2021's Estimate At Completion, Construction Contract and current and anticipated Construction Change Orders.
**Public Share will be funded with Measure I Valley Freeway Interchange funds.
***Construction Capital cost includes an estimate of $380,000 for the full replacement of pavement structure at University Street added based on Caltrans 100% review comment.

PROJECT SCHEDULE

Milestones	Estimated Completion Date (Actual)
Environmental Approval	(February 2017)
Design Approval	(December 2019)
Construction Contract Award	(September 2020)
Complete for Beneficial Use	March 2022

CITY OF REDLANDS
REQUEST FOR ADDITIONAL APPROPRIATION

DATE OF REQUEST: 2/1/2022

FINANCE USE ONLY
TRANSACTION NO:
ACCOUNTING PERIOD:

An additional appropriation is hereby requested as follows:

Department: MUED

EXPENDITURE APPROPRIATION INCREASE (if applicable)				
Account Description	**Orgkey**	**Object Code**	**Job Ledger (If applicable)**	**Amount**
I-10/University Improvements	254400	8501	41400	$ 137,830.00
				$ $ 137,830.00

REVENUE APPROPRIATION INCREASE (if applicable)				
Account Description	**Orgkey**	**Object Code**	**Job Ledger (If applicable)**	**Amount**
				$ $ 0.00

JUSTIFICATION: Additional funding required for unanticipated design changes and site conditions.

Requested By: John R. Harris JRH
Department Head

Recommended By Finance Director:

Yes _____ No _____ Signed _____

Comments: _____

Recommended: _____
City Manager

Approved by City Council:

Date: _____

Signed: _____
City Clerk

COOPERATIVE AGREEMENT NO. R14088

BETWEEN

SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

AND

CITY OF REDLANDS

FOR

PLANNING, PROJECT REPORT AND ENVIRONMENTAL DOCUMENT, PLANS, SPECIFICATIONS AND ESTIMATE (PS&E), RIGHT-OF-WAY (ROW) AND CONSTRUCTION PHASES OF THE INTERCHANGE AT UNIVERSITY STREET AND INTERSTATE 10 IN THE CITY OF REDLANDS

I. PARTIES AND TERM

A. THIS COOPERATIVE AGREEMENT ("Agreement") is made and entered into by and between the San Bernardino County Transportation Authority (hereinafter referred to as "AUTHORITY") and the City of REDLANDS (hereinafter referred to as "CITY"), (AUTHORITY and CITY may be referred to herein as a "Party" and collectively "Parties").

B. This Agreement shall terminate upon completion of the AUTHORITY's management of the planning, environmental, design, right of way (to include both ROW acquisition and utility relocation work), and construction, except that the indemnification provisions shall remain in effect until terminated or modified, in writing, by mutual agreement. Should any claims arising out of this Agreement be asserted against one of the Parties, the Parties agree to extend the fixed termination date of this Agreement, until such time as the claims are settled, dismissed or paid.

II. RECITALS

A. WHEREAS, CITY intends to improve the Interstate 10 at University Street Interchange in the City of REDLANDS; and

B. WHEREAS, planned improvements include ramp widening on the Interstate 10 at University Street, including intersection work, turning lanes and striping as further described in Attachment A, attached hereto and made part of this Agreement, and is defined as the "PROJECT"; and

C. WHEREAS, the PROJECT is identified in the Measure I 2010-2040 Expenditure Plan and SANBAG Nexus Study (Nexus Study) prepared by the San Bernardino Associated Governments (SANBAG), and approved by the SANBAG Board of Directors on November 2, 2011; and

D. WHEREAS, the Parties consider PROJECT to be high priority and are willing to participate in funding the PROJECT pursuant to the provisions of the Nexus Study; and

E. WHEREAS, the Parties wish to enter into this Agreement to delineate roles, responsibilities, and funding commitments relative to the Project Management, Planning, Environmental, PS&E, ROW (to include both ROW Acquisition and Utility Relocations), and Construction activities of the PROJECT; and

F. WHEREAS, the PROJECT is estimated to cost a total of $5,200,000 which includes $100,000 for the AUTHORITY to provide project management services for the Planning, Environmental, PS&E, ROW, Utility Relocation, and Construction phases of the Project; and

G. WHEREAS, coordination with Caltrans has not occurred to determine the necessary scope and detail level of environmental and engineering documents for the PROJECT and nor has payment for encroachment fees been addressed or included in this Agreement, as such costs will be addressed in a future agreement between the Parties; and

H. WHEREAS, CITY desires AUTHORITY to provide project management services for the Planning, Environmental, PS&E, ROW, and Construction phases, estimated at $100,000, and is the sole responsibility of CITY to pay 100% of actual AUTHORITY project management costs in accordance with AUTHORITY Policy 40005/VFI-34; and

I. WHEREAS, the remaining PROJECT cost, aside from AUTHORITY project management costs, for the Planning, Environmental, PS&E, ROW, and Construction phases is estimated at $5,100,000 which shall be funded with 17.9% Development Share funds and 82.1% Public Share funds, as defined by the Nexus Study and the SANBAG Measure I 2010-2014 Strategic Plan.

NOW, THEREFORE, the Parties agree to the following:

III. AUTHORITY RESPONSIBILITIES

AUTHORITY agrees:

A. To be lead agency on Project Management, Planning, Environmental, PS&E, ROW, and Construction work and to diligently undertake and complete, the Planning, Environmental, ROW, PS&E, and Construction work on PROJECT, including the selection and retention of consultants. Performance of services under these consultant contracts shall be subject to the technical direction of the AUTHORITY's Director of Project Delivery, or his designee, with input and consultation from CITY.

B. To coordinate with Caltrans for first and second level reviews related to property acquisitions and to provide all support documents necessary for Hearings of Resolutions of Necessity to

be conducted at the California Transportation Commission in the event voluntary acquisition is unlikely.

C. To contribute towards the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT cost an amount not to exceed $4,187,100, as shown in Attachment A. The actual cost of a specific phase may ultimately vary from the estimates provide in Attachment A, however, under no circumstances is the total combined AUTHORITY contribution to exceed $4,187,100 without an amendment to this Agreement.

D. To prepare and submit to CITY an original and two copies of signed invoices for reimbursement of eligible PROJECT expenses. Invoices may be submitted to CITY as frequently as monthly.

E. To establish and maintain an accounting system conforming to Generally Accepted Accounting Principles (GAAP) to support AUTHORITY's request for reimbursement, payment vouchers, or invoices which segregate and accumulate costs of PROJECT Management and Oversight, Planning, Environmental, PS&E, ROW, and Construction work elements and produce monthly reports which clearly identify reimbursable costs, matching fund costs, indirect cost allocation, and other allowable expenditures by AUTHORITY.

F. To prepare a final accounting of expenditures, including a final invoice for the actual PROJECT Management, Planning, Environmental, ROW, PS&E, and Construction costs. The final accounting and invoice shall be submitted no later than one hundred and twenty (120) calendar days following the completion of work and shall be submitted to CITY. The invoice shall include a statement that these PROJECT funds were used in conformance with this Agreement and for those PROJECT-specific Planning, Environmental, PS&E, ROW, and Construction work activities.

G. To cooperate in having a PROJECT-specific audit completed by CITY, at its option, upon completion of the PROJECT Planning, Environmental, ROW, PS&E, and Construction work. The audit should justify and validate that all funds expended on the PROJECT were used in conformance with this Agreement.

H. To reimburse CITY for costs that are determined by subsequent audit to be unallowable within ninety (90) calendar days of AUTHORITY receiving notice of audit findings, which time shall include an opportunity for AUTHORITY to respond to and/or resolve the finding. Should the finding not be otherwise resolved and AUTHORITY fails to reimburse monies due CITY within ninety (90) calendar days of audit finding, or within such other period as may be agreed upon by the Parties, CITY reserves the right to withhold future payments due AUTHORITY from any source under CITY's control.

I. To include CITY in Project Development Team (PDT) meetings and related communications on PROJECT progress as well as to provide CITY with copies of PDT meeting minutes and action items.

J. To provide CITY an opportunity to review and comment on the Planning, Environmental, PS&E, ROW, and Construction documents.

IV. CITY RESPONSIBILITIES

CITY agrees:

A. To reimburse AUTHORITY for the actual costs incurred estimated at $912,900 towards the Planning, Environmental, PS&E, ROW, Utility Relocation and Construction phases of the PROJECT cost and $100,000 for SANBAG management for an amount not to exceed $1,012,900 as shown in Attachment A. The actual cost of a specific phase may ultimately vary from the estimates provided in Attachment A, however, under no circumstances is the total combined CITY contribution to exceed $1,012,900 without an amendment to this Agreement.

B. To reimburse AUTHORITY within 30 days after AUTHORITY submits an original and two copies of the signed invoices in the proper form covering those actual allowable PROJECT expenditures and SANBAG oversight and management that were incurred by AUTHORITY. Invoices may be submitted to CITY as frequently as monthly.

C. When conducting an audit of the costs claimed under the provisions of this Agreement, to rely to the maximum extent possible on any prior audit of AUTHORITY performed pursuant to the provisions of State and Federal laws. In the absence of such an audit, work of other auditors will be relied upon to the extent that work is acceptable to CITY when planning on conducting additional audits.

D. To designate a responsible staff member that will be CITY's representative in attending the PDT meetings, receiving day-to-day communication, and reviewing the project documents.

E. To complete review and provide comments on the Planning, Environmental, PS&E, and ROW documents within one month of receiving the review request from AUTHORITY.

F. CITY's City Manager,and the City Manager's designees,are authorized to execute all documents necessary or related to carry out CITY's obligations under this Section IV of this Agreement.

V. MUTUAL RESPONSIBILITIES

The Parties agree:

A. To abide by all applicable Federal, State and Local laws and regulations pertaining to the PROJECT, including policies in the applicable program in the Measure I 2010-2040 Strategic Plan, as amended, as of the Effective Date of this Agreement.

B. In the event AUTHORITY determines PROJECT Management, Planning, Environmental, PS&E, ROW, and Construction work may exceed the amounts identified in Attachment A of

this Agreement, AUTHORITY shall inform CITY of this determination and thereafter the Parties shall work together in an attempt to agree upon an amendment to the amounts identified this Agreement. In no event, however, shall any of the Parties be responsible for PROJECT costs in excess of the amounts identified in this Agreement absent a written amendment that is approved by the Parties.

C. Eligible PROJECT reimbursements shall include only those costs incurred by AUTHORITY for PROJECT-specific work activities that are described in this Agreement and shall not include escalation or interest.

D. In the event that federal funds are used in the Planning, Environmental and/or PS&E phase of work, the PARTIES acknowledge Federal Highway Administration (FHWA) requires that the PROJECT must progress to a capital phase (ROW or construction) within ten years or the federal funds may be required to be repaid to FHWA. Should repayment be required, and is a result of the PROJECT not progressing by choice, it shall be the responsibility of the PARTY that determines it is unable to move forward with the PROJECT. If it is mutually decided that the project will not move forward then repayment of any federal funds used for Public Share will be the responsibility of the AUTHORITY and any federal funds used for the Local Share will be the responsibility of the CITY.

E. Neither AUTHORITY nor any officer, director, employee or agent thereof is responsible for any injury, damage or liability occurring or arising by reason of anything done or omitted to be done by CITY under or in connection with any work, authority or jurisdiction delegated to CITY under this Agreement. It is understood and agreed that, pursuant to Government Code Section 895.4, CITY shall fully defend, indemnify and save harmless AUTHORITY, its officers, directors, employees or agents from all claims, suits or actions of every name, kind and description brought for or on account of injury (as defined by Government Code Section 810.8) occurring by reason of anything done or omitted to be done by CITY under or in connection with any work, authority or jurisdiction delegated to CITY under this Agreement.

F. Neither CITY nor any officer, director, employee or agent thereof is responsible for any injury, damage or liability occurring or arising by reason of anything done or omitted to be done by AUTHORITY and under or in connection with any work, authority or jurisdiction delegated to AUTHORITY under this Agreement. It is understood and agreed that, pursuant to Government Code Section 895.4, AUTHORITY shall fully defend, indemnify and save harmless CITY, its officers, directors, employees or agents from all claims, suits or actions of every name, kind and description brought for or on account of injury (as defined by Government Code Section 810.8) occurring by reason of anything done or omitted to be done by AUTHORITY under or in connection with any work, authority or jurisdiction delegated to AUTHORITY under this Agreement.

G. This Agreement will be considered terminated upon reimbursement of eligible costs by CITY. Notwithstanding any other provision herein, to the extent consistent with the terms and obligations hereof, any Party may terminate this Agreement at any time, with or without cause, by giving thirty (30) calendar days written notice to all the other Parties. In the event

of a termination, the Party terminating this Agreement shall be liable for any costs or other obligations it may have incurred under the terms of this Agreement prior to termination.

H. The Recitals to this Agreement are true and correct and are incorporated into this Agreement.

I. All signatories hereto warrant that they are duly authorized to execute this Agreement on behalf of said Parties and that by executing this Agreement, the Parties hereto are formally bound to this Agreement.

J. Except on subjects preempted by federal law, this Agreement shall be governed by and construed in accordance with the laws of the State of California. All Parties agree to follow all local, state, county and federal laws and ordinances with respect to performance under this Agreement.

K. The Parties agree that each Party and any authorized representative, designated in writing to the Parties, and upon reasonable notice, shall have the right during normal business hours to examine all Parties' financial books and records with respect to this Agreement. The Parties agree to retain their books and records for a period of five (5) years from the later of; a) the date on which this Agreement terminates; or b) the date on which such book or record was created.

L. If any clause or provisions of this Agreement is illegal, invalid or unenforceable under applicable present or future laws, then it is the intention of the Parties that the remainder of this Agreement shall not be affected but shall remain in full force and effect.

M. This Agreement cannot be amended or modified in any way except in writing, signed by all Parties hereto.

N. Neither this Agreement, nor any of the Parties' rights, obligations, duties, or authority hereunder may be assigned in whole or in part by either Party without the prior written consent of the other Party in its sole, and absolute, discretion. Any such attempt of assignment shall be deemed void and of no force and effect.

O. No waiver of any default shall constitute a waiver of any other default whether of the same or other covenant or condition. No waiver, benefit, privilege, or service voluntarily given or performed by a Party shall give the other Party any contractual rights by custom, estoppel, or otherwise.

P. In the event of litigation arising from this Agreement, each Party to this Agreement shall bear its own costs, including attorney(s) fees. This paragraph shall not apply to the costs or attorney(s) fees relative to paragraphs E and F of this Section.

Q. This Agreement may be signed in counterparts, each of which shall constitute an original. This Agreement is effective and shall be dated on the date executed by AUTHORITY.

R. Any notice required, authorized or permitted to be given hereunder or any other communications between the Parties provided for under the terms of this Agreement shall be

in writing, unless otherwise provided for herein, and shall be served personally or by reputable courier addressed to the relevant party at the address/fax number stated below:

If to AUTHORITY: Garry Cohoe
Director of Project Delivery
1170 West Third Street, Second Floor
San Bernardino, CA 92410-1715
Telephone: (909) 884-8276

If to CITY: Fred Mousavipour
Director Municipal Utilities and Engineering
35 Cajon Street, Suite 15A
REDLANDS, CA 92373
Telephone: (909) 798-7698

S. There are no third party beneficiaries, and this Agreement is not intended, and shall not be construed to be for the benefit of, or be enforceable by, any other person or entity whatsoever.

T. Attachment A (Project Scope, Project Cost Estimate and Funding Shares, and Project Milestones) and Attachment B (Conceptual Layout) are attached to and incorporated into this Agreement.

SIGNATURES ON FOLLOWING PAGE:

SIGNATURE PAGE TO
COOPERATIVE AGREEMENT NO. R14088
BETWEEN
SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY
and CITY OF REDLANDS

SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

By:_____
W.E. Jahn
President, Board of Directors

Date: 2-5-14

APPROVED AS TO FORM

By: _____ 2/3/14
Eileen Monaghan Teichert
General Counsel

By:_____
Jeffery Hill
Contract Administrator

CITY OF REDLANDS

By: Pete Aguilar
Pete Aguilar, Mayor

Date: 1/21/14

APPROVED AS TO FORM

By:_____
Daniel J. McHugh
City Attorney

ATTEST

By:_____
Sam Irwin, City Clerk

Attachment A

Project Scope:

The PROJECT will improve the Interstate 10/University Street interchange ramps, including intersection work, turning lanes and striping. It is anticipated that **AUTHORITY** will be lead on all phases of work.

Project Cost Estimate* and Funding Shares:

Public Share: 82.1%
Nexus Development Impact Fee Share (DIF, "Development Share" or "Local Share"): 17.9%
Local Jurisdictional Split of the DIF Share: Redlands 100%

Phase	Estimated Cost*	Public Share**	Development Share
Project Study Report/Project Development Support Project Initiation Document (PSR/PDS)	$50,000	$41,050	$8,950
Project Approval and Environmental	$150,000	$123,150	$26,850
Design	$240,000	$197,040	$42,960
Right-of-Way (includes Acquisition and Utility Relocations, but excludes condemnation costs)	$260,000	$213,460	$46,540
Construction (Includes Construction Management & Landscaping)	$4,400,000	$3,612,400	$787,600
SANBAG Project Management	$100,000	$0	$100,000
Total	$5,200,000	$4,187,100	$1,012,900

* Project estimate is based on conceptual level layouts as PSR/PDS has not been completed. Coordination with Caltrans has not occurred therefore the level of environmental and engineering documents have not been defined nor have encroachment fees been addressed. Costs based on low level environmental document and no encroachment fees are included. Construction Phase cost includes approximately $200,000 for landscaping.

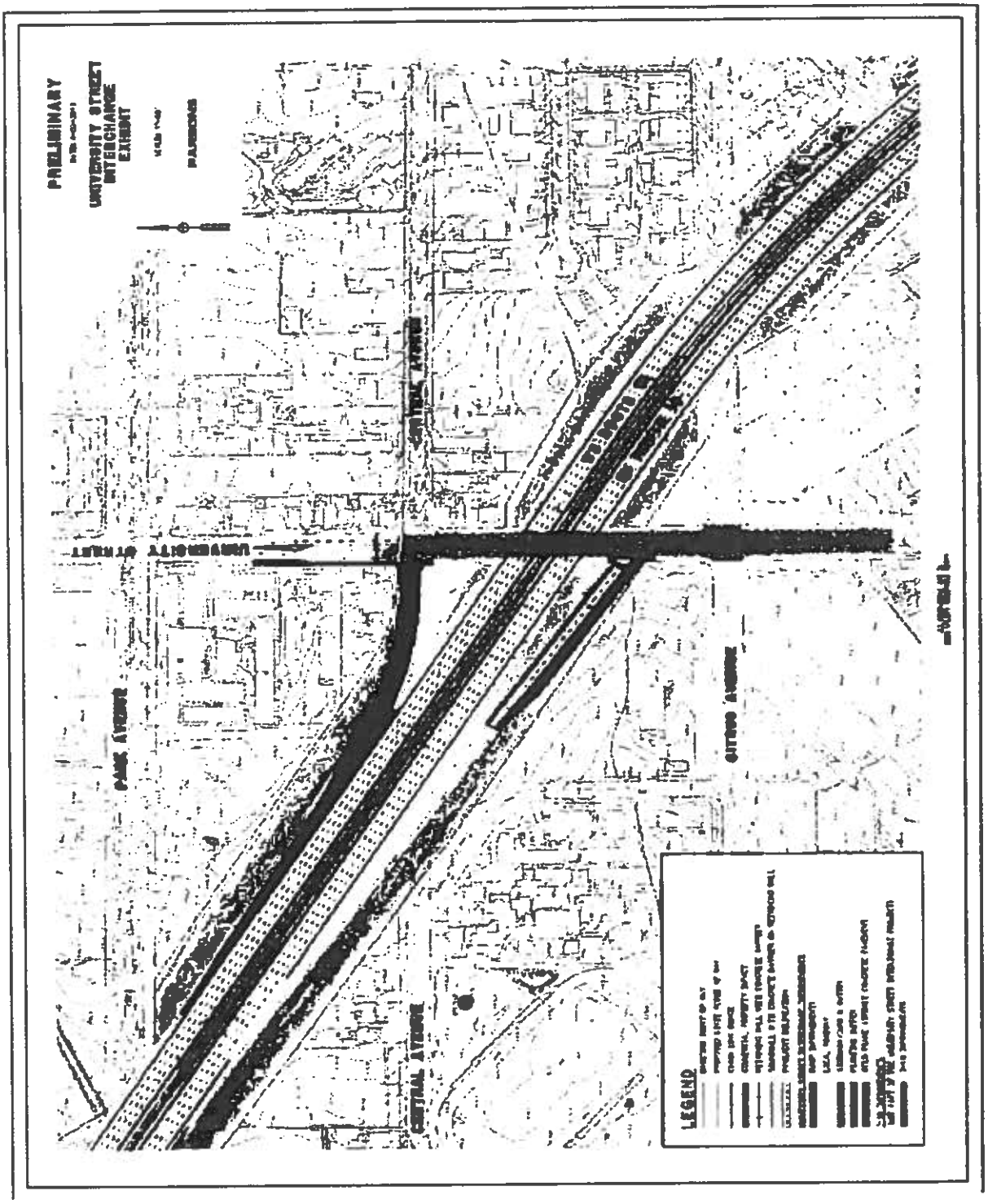
** It is anticipated that the Public Share will be funded with Measure I Valley Freeway Interchange Funds, however, the Public Share can be from other sources under control of AUTHORITY without necessitating an amendment of this AGREEMENT so long as an allocation is approved by the AUTHORITY Board.

Project Milestones:

Milestone	Forecast
Start of Project	September 2013
PSR/PDS Approval	September 2014
Environmental Approval	April 2016
Design Approved/ROW Certified	April 2018
Construction Notice to Proceed (Assumes no federal authorization required. For federal authorization add three months.)	June 2018
Completed for Beneficial Use	June 2019

Exhibit B

Conceptual Layout



R14088

AMENDMENT NO. 1

TO COOPERATIVE AGREEMENT NO. R14088

BETWEEN

SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

AND

CITY OF REDLANDS

FOR

PLANNING, PROJECT REPORT AND ENVIRONMENTAL DOCUMENT, PLANS, SPECIFICATIONS AND ESTIMATE (PS&E), RIGHT-OF-WAY (ROW), AND CONSTRUCTION PHASES FOR THE INTERCHANGE AT UNIVERSITY STREET AND INTERSTATE 10 IN THE CITY OF REDLANDS

THIS AMENDMENT No. 1 (AMENDMENT) to the Cooperative Agreement No. R14088 (AGREEMENT) is made and entered into by and between the San Bernardino County Transportation Authority (hereinafter referred to as AUTHORITY) and the City of Redlands (hereinafter referred to as CITY). AUTHORITY and CITY may be referred to herein as a "PARTY" and collectively "PARTIES".

RECITALS

A. AUTHORITY and CITY entered into the AGREEMENT on February 5, 2014, to delineate their respective roles, responsibilities, and funding commitments relative to the Project Management, Planning, Environmental, PS&E, ROW and Construction activities of the Interchange at University Street and Interstate 10 in the City of Redlands (PROJECT); and

B. Pursuant to the AGREEMENT, AUTHORITY is the lead agency for the PROJECT and is responsible for the diligent undertaking and completion of the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT; and

C. The AGREEMENT presently provides that the cost of the PROJECT is estimated at $5,200,000 which includes $100,000 for AUTHORITY to provide project management services for the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT; and

D. The PROJECT is now estimated to cost a total of $5,812,935 which includes $345,000 for the AUTHORITY to provide project management services for the

Planning, Environmental, PS&E, ROW, and Construction Phases of the PROJECT; and

E. On November 14, 2019, the California Department of Transportation (Caltrans) committed to make a financial contribution (FCO) in the amount of $500,000 towards the construction of the eastbound off-ramp widening portion of the PROJECT; and

F. The remaining PROJECT cost, aside from AUTHORITY project management costs and the abovementioned Caltrans FCO, now is estimated at $4,967,935, which shall be funded with 17.9% Development Shares funds and 82.1% Public Share funds, as defined by AUTHORITY's Nexus Study and the Measure I 2010-2040 Strategic Plan; and

G. The PARTIES desire to amend the AGREEMENT, and its Attachment A, to redefine their respective funding responsibilities based on the revised PROJECT costs and to provide a new, updated, estimated schedule for completion of the PROJECT.

IT IS THEREFORE MUTUALLY AGREED TO AMEND THE AGREEMENT AS FOLLOWS:

1. Section III.C of the AGREEMENT is amended in its entirety to read as follows:

   To contribute towards the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT cost an amount not to exceed $4,078,675, as shown in Attachment A. The actual cost of specific phase may ultimately vary from the estimates provided in Attachment A, however, under no circumstances is the total combined AUTHORITY contribution to exceed $4,078,675 without an amendment to this Agreement.

2. Section III.J of the AGREEMENT, is amended in its entirety to read as follows:

   To provide CITY an opportunity to review and comment on the Planning, Environmental, PS&E, ROW, and Construction documents. For construction change orders, the construction change order documents submitted to AUTHORITY by contractors performing construction work on the PROJECT will be forwarded to CITY for review and comment.

3. Section IV.A of the AGREEMENT is amended in its entirety to read as follows:

   To reimburse AUTHORITY for the actual costs incurred estimated at $889,260 towards the Planning, Environmental, PS&E, ROW, and Construction phases of the PROJECT cost and $345,000 for AUTHORITY project management for a

total amount not to exceed $1,234,260, as shown in Attachment A. The actual cost of a specific phase may ultimately vary from the estimates provided in Attachment A, however, under no circumstances is the total combined CITY contribution to exceed $1,234,260 or AUTHORITY project management costs to exceed $345,000 without an amendment to this Agreement.

4. Section IV of the AGREEMENT is amended by the addition of Subsection G which shall read as follows:

   To provide permits, inspections, reviews, and oversight at no cost to AUTHORITY or to consultants and contractors contracted by AUTHORITY to work on the PROJECT.

5. Section V.R of the AGREEMENT is amended in its entirety to read as follows:

   Any notice or other communication required, or which may be given, pursuant to this Agreement, shall be in writing. Any such notice shall be deemed delivered (i) on the date of delivery in person; (ii) five (5) days after deposit in first class registered mail, with return receipt requested; (iii) on the actual delivery date if deposited with an overnight courier; or (iv) on the date sent by facsimile, if confirmed with a copy sent contemporaneously by first class, certified, registered or express mail; in each case properly posted and fully prepaid to the appropriate address set forth below, or such other address as a Party may provide notice in accordance with this section:

If to AUTHORITY:	Paula Beauchamp Director of Project Delivery 1170 West Third Street, Second Floor San Bernardino, CA 92410-1715 Telephone: (909) 884-8276
If to CITY:	City Clerk City of Redlands 35 Cajon Street P.O. Box 3005 (mailing) Redlands, CA 92373 jdonaldson@cityofredlands.org (909) 798-7531"

6. Attachment A to the AGREEMENT is amended and replaced in its entirety with Attachment A to this AMENDMENT, which is attached to and made a part of this AMENDMENT.

7. PARTIES understand that the PROJECT cost provided in this AMENDMENT is an estimate and there is a potential for cost increases or decreases. If a cost increase becomes apparent, PARTIES agree to work in good faith to amend the AGREEMENT.

8. All other terms and conditions of the AGREEMENT shall remain in full force and effect.

9. This AMENDMENT is deemed to be included and made part of the AGREEMENT.

10. This AMENDMENT is effective upon execution by AUTHORITY.

----------SIGNATURES ON FOLLOWING PAGE----------

SIGNATURE PAGE TO
AMENDMENT NO. 1 TO COOPERATIVE AGREEMENT NO. R14088
BETWEEN
SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY
and CITY OF REDLANDS

SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

By: _____
Darcy McNaboe
President, Board of Directors

Date: 6/8/2020

CITY OF REDLANDS

By: _____
Paul W. Foster
Mayor, City of Redlands

Date: 5/19/20

APPROVED AS TO FORM

By: _____ 6/4/2020
Juanda L. Daniel
Assistant General Counsel

APPROVED AS TO FORM AND PROCEDURE:

By: _____
Daniel J. McHugh
City Attorney

CONCURRENCE:

By: _____
Jeffery Hill
Procurement Manager

ATTEST:

By: _____
Jeanne Donaldson
City Clerk

Attachment A

PROJECT SCOPE

The PROJECT will improve the Interstate 10/University Street interchange ramps, including intersection work, turning lanes and striping. It is anticipated that AUTHORITY will be the lead on all phases of work.

PROJECT COST ESTIMATE AND FUNDING TABLE

Public Share: 82.1%
Nexus Development Impact Fee Share (DIF or "Local Share"): 17.9%
Local Jurisdictional Split of the DIF Share: Redlands 100%
Caltrans Financial Contribution (FCO): Lump Sum $500,000

	Project Cost*	**Public Share****	**DIF Share**	**Caltrans FCO^**
Planning, Environmental, Design, and Right-of-way	$969,807	$796,212	$173,595	$0
Construction Management	$488,128	$400,753	$87,375	$0
Construction Capital***	$4,010,000	$2,881,710	$628,290	$500,000
Project Management	$345,000	$0	$345,000	$0
	$5,812,935	**$4,078,675**	**$1,234,260**	**$500,000**

*Project Cost is based on 2020's Estimate At Completion and 100% Engineer's Estimate.
**Public Share will be funded with Measure I Valley Freeway Interchange funds.
***Construction Capital cost includes an estimate of $380,000 for the full replacement of pavement structure at University Street added based on Caltrans 100% review comment.
^Caltrans FCO will be available in fiscal year 2020/2021 upon execution of a separate cooperative agreement between Authority and Caltrans

PROJECT SCHEDULE

Milestones	Estimated Completion Date (Actual)
Environmental Approval	(February 2017)
Design Approval	(December 2019)
Construction Contract Award	August 2020
Complete for Beneficial Use	October 2021

City Council/Successor Agency Meeting **O. 3.**

DATE: 02/01/2022

TO: The Successor Agency Board of Directors

SUBJECT: Approve minutes of the regular meeting of December 7, 2021 (Secretary Donaldson)

MOTION:

I move to approve the minutes of the regular meeting of December 7, 2021.

Attachments

Minutes of the regular meeting of December 7, 2021

MINUTES

Regular meetings of the City Council and the Board of Directors of the Successor Agency of the former Redevelopment Agency of the City of Redlands held in the Council Chambers, Civic Center, 35 Cajon Street, on December 7, 2021 at 5:00 P.M.

Present: Paul Barich, Mayor
Eddie Tejeda, Mayor Pro Tempore
Paul Foster, Council Member
Denise Davis, Council Member
Jenna Guzman-Lowery, Council Member

Staff: Charles M. Duggan, Jr., City Manager; Dan McHugh, City Attorney; Jeanne Donaldson, City Clerk; Carl Baker, Public Information Officer; Chris Catren, Police Chief; Danielle Garcia, Management Services/Finance Director; Chris Boatman, Facilities and Community Services Director; Brian Desatnik, Development Services Director; Jim Topoleski, Fire Chief; John Harris, Municipal Utilities and Engineering Director; Don McCue, Library Director; Janice McConnell, Assistant City Manager

Mayor Barich called the meeting to order and offered those present the opportunity to provide public comment on any item on the agenda for the closed session.

PUBLIC COMMENT

Andrew Christopherson, Head of Grove School, described the partnership the school has built with the City over the last several years and their desire for a shared future vision. The school was looking for clarity when determining whose responsibility it was for the care of the property. Areas to be considered in the review included, increased traffic, security needs and maintenance and repairs.

LATE BREAKING ITEM

Council Member Foster reviewed the need to take immediate action to approve an agenda item be added for Council's consideration related to the California Citizens Redistricting Commission's proposed maps affecting Redlands for the State's Congressional and Legislative Districts. On motion of Council Member Foster, seconded by Mayor Pro Tempore Tejeda, the City Council, unanimously agreed to add the "late breaking" item to the agenda for discussion, under Communications, as Agenda Item J-4.

CLOSED SESSION

Conference with real property negotiators - Government Code §54956.8
(Facilities and Community Services Director Boatman)

Property:	APN 0168-091-07-0000
Agency Negotiators:	Charles M. Duggan, Jr.; Chris Boatman
Negotiating Party:	Aaron Jones, San Bernardino Municipal Water District
Under Negotiation:	Terms of payment and price of possible purchase of property by City

Conference with real property negotiators - Government Code §54956.8
(Facilities and Community Services Director Boatman)

Property:	APN 0292-166-08-0000
Agency Negotiators:	Charles M. Duggan, Jr.; Chris Boatman
Negotiating Party:	Andrew Christopherson, The Grove School
Under Negotiation:	Terms of payment and price of possible lease amendment or purchase of City property

Conference with real property negotiators - Government Code §54956.8
(Facilities and Community Services Director Boatman)

Property:	A portion of the Orange Street Alley, Redlands
Agency Negotiators:	Charles M. Duggan, Jr.; Chris Boatman
Negotiating Party:	David Kramer, Cope House
Under Negotiation:	Discussion and possible action relating to a license agreement

Public Employee Performance Evaluation - Government Code §54957
(Mayor Barich and Mayor Pro Tem Tejeda)

1. City Manager
2. City Attorney

Conference with labor negotiator - Government Code §54957.6
(Assistant City Manager McConnell)

Agency Negotiators:	Mayor Barich and Mayor Pro Tem Tejeda
Unrepresented Employee:	City Manager

RECONVENE CITY COUNCIL MEETING

The meeting reconvened at 6:15 P.M. with an invocation by Mayor Barich followed by the pledge of allegiance to the American flag.

CLOSED SESSION REPORT

City Attorney McHugh announced that no reportable action was taken during the closed session.

PRESENTATIONS

Children's Choir Holiday Performance

The Redlands Stake of the Church of Jesus Christ of Latter-Day Saints Children's Choir, performed musical selections celebrating the holiday season.

City's 2021 Holiday Video

Public Information Officer, Carl Baker, presented the City's 2021 Holiday video wishing the community a wonderful holiday season.

Proclamation Fresh Air Challenge Month

Mayor Barich presented a Proclamation to Sherli Leonard and Kathy Behrens, representing the Redlands Conservancy, declaring January 2022, as Fresh Air Challenge Month. They highlighted the upcoming Fresh Air Challenge and encouraged Redlanders to walk a million miles in January.

Recognition of Council Member Paul W. Foster

Expression of Appreciation - Council Member Foster - For his many years of service as a member of the City Council and other commissions, Paul W. Foster received expressions of gratitude and praise from each of his fellow Council Members. He was recognized for his thoughtful insight and strong leadership. Additional presentations, honoring his dedication to serving the community, were made by Third District County Supervisor Dawn Rowe, Sid Sonick, Field Representative for Senator Rosillicie Ocho Bogh and the Hometown Heroes Foundation Board Members Toni Momberger, Mick Gallagher and Jim Nolan. Several members of the public also conveyed their deep appreciation of his commitment, dedication and service. They included, Pamela Ong, Mike Warren, Larry Dierdorff, Judy Cannon, Tabitha Johnson, Neal Waner, Toni Momberger and Mario Saucedo.

Council Member Foster thanked all those with whom he has worked over the years and praised City staff for their commitment to excellence. He described several projects and accomplishments of note during his tenure, including, reducing the City's debt, building reserves, balancing budgets, 125th Anniversary Celebration, Heritage Park, Art Initiative, Heritage Grove off California Street, Gateway beautification projects, PARIS pavement program, the Redlands Rail Project and Measure T.

PUBLIC COMMENT

SBCTA Rail Project Claims - Fernando Ramirez described the difficulties he has faced while attempting to file claims against San Bernardino County Transportation Authority (SBCTA), that have been caused as a direct result of the Redlands Rail Project. He requested assistance from the City in dealing with the agency's outright rejection of his claims.

Thanks & Concerns - Dennis Bell thanked Paul Foster for his service. He stated there was no accountability with how Measure T monies are spent, and in his opinion, the City has wrongly prioritized cultural amenities over public safety. He added there are too many liquor licenses issued in the City.

Preventative Policing - Randall Morris urged the Council to engage in more preventative policing measures throughout the City, especially related to traffic and speeding violations on Orange Street.

CONSENT CALENDAR

Minutes

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the minutes of the regular meeting of November 16, 2021.

Vote: 5 - 0 Passed

Proclamation Fresh Air Challenge Month

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved issuance of a proclamation declaring January 2022 as Fresh Air Challenge Month.

Vote: 5 - 0 Passed

Citrus Preservation Commissioner Appointment

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously appointed Marc Shaw to serve the remainder of a four-year term on the Citrus Preservation Commission ending April 16, 2022.

Vote: 5 - 0 Passed

Municipal Utilities/Public Works Commissioner Appointments

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously reappointed R. Brad Thoms to serve a four-year term on the Municipal Utilities/Public Works Commission ending December 7, 2025; and reappointed Adekunle Ojo to serve a four-year term on the Municipal Utilities/Public Works Commission ending December 7, 2025.

Vote: 5 - 0 Passed

Airport Advisory Board Member Appointment

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously appointed Thomas Cook to serve the remainder of a four-year term on the Airport Advisory Board ending May 1, 2024.

Vote: 5 - 0 Passed

Library Board of Trustees Appointment

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously reappointed William Hardy Jr. to serve another three-year term on the Library Board of Trustees beginning January 1, 2022 and ending January 1, 2025.

Vote: 5 - 0 Passed

2022 Local Appointments List

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the Local Appointments List for 2022 as required by Government Code Section 54972.

Vote: 5 - 0 Passed

City Manager Revised Employment Agreement

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved a revised employment agreement with the City Manager. On October 19, 2021, the City Council approved a new employment agreement with the City Manager that included a term in the agreement that could not be upheld due to limitations set forth by the Public Employee Pension Reform Act. The new employment agreement has been revised to comply with these regulations, with the overall compensation to remain the same.

Vote: 5 - 0 Passed

Local Roadway Safety Plan Grant Acceptance

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously determined that acceptance of the Local Roadway Safety Plan grant and approval of the agreement to complete the study are exempt from environmental review pursuant to Section 15061(b)(3) of the State's Guidelines implementing the California Environmental Quality Act; accepted the Local Roadway Safety Plan grant from California Department of Transportation; approved a Professional Services Agreement with KOA Corporation in an amount not-to-exceed $73,778.59 to complete a Local Roadway Safety Plan Study; and approved an additional appropriation of $76,000.

Vote: 5 - 0 Passed

Cooperative Agreement Revisions Pavement Program

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved minor administrative revisions to the previously approved Cooperative Agreement with the City of Yucaipa delineating responsibilities for rehabilitating 16th Street, 18th Street, and Florida Street during the Pavement Management Program 2021 Street Resurfacing Project.

Vote: 5 - 0 Passed

Resolution No. 8275 WWTP UpgradesFinancial Assistance

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously determined approval of Resolution No. 8275 is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved Resolution No. 8275, authorizing the City Manager or his designee to sign and submit a Financial Assistance Agreement application and related documents, on behalf of the City of Redlands, to the State Water Resources Control Board for the planning, design, and construction of the City of Redlands Wastewater Treatment Plant Upgrades Project.

Vote: 5 - 0 Passed

Resolution No. 8276 Approved Contractor List

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously determined that approval of the Resolution is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved Resolution No. 8276, establishing an approved contractor list pursuant to the Uniform Public Construction Cost Accounting Act.

Vote: 5 - 0 Passed

Resolution No. 8243 Establishing a Crosswalk

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously determined approval of the resolution is exempt from environmental review pursuant to Section 15301(c) of the State's guidelines implementing the California Environmental Quality Act; and approved Resolution No. 8243, establishing a crosswalk on Fifth Avenue at Marion Road.

Vote: 5 - 0 Passed

Resolution No. 8278 Investment of City Monies

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved Resolution No. 8278, authorizing the investment of City monies in the Local Agency Investment Fund and rescinding Resolution No. 8221.

Vote: 5 - 0 Passed

Resolution No. 8279 Authorized Signers Union Bank

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved Resolution No. 8279, updating the authorized signers on all accounts held with Union Bank N.A. and Rescinding Resolution No. 8222.

Vote: 5 - 0 Passed

Utility Customer Management Database Invoice

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved payment of an invoice to Systems & Software, Inc. for support of the enQuesta Utility Database for Customer Management in an amount not-to-exceed $171,287 for annual software maintenance and support.

Vote: 5 - 0 Passed

Memorandum of Agreement County Sheriff's Department

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the Memorandum of Agreement between the City and the San Bernardino County Sheriff's Department regarding officer involved shootings and state reportable in-custody death investigations.

Vote: 5 - 0 Passed

MOU Loma Linda University Children's Hospital

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the Memorandum of Understanding between the City and Loma Linda University Children's Hospital for use of the Children's Assessment Center; and authorized the Chief of Police to execute the agreement.

Vote: 5 - 0 Passed

Public Safety Foundation Grant Acceptance

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the acceptance of the grant from the Firehouse Subs Public Safety Foundation in the amount of $19,653.60 for the purchase of ballistic vests for operations personnel.

Vote: 5 - 0 Passed

MOU Local Fire Agencies Application for Grant Funding

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the Memorandum of Understanding with local fire agencies for the submittal of a regional application to the FY2021 Assistance to Firefighters Grant Program for the purchase of safety communication equipment and authorized its execution by the Fire Chief.

Vote: 5 - 0 Passed

Ordinance No. 2929 Recyclables

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously adopted Ordinance No. 2929, amending Chapter 13.64 of the Redlands Municipal Code to implement mandatory residential and commercial recycling of commingled recyclables and organic waste.

Vote: 5 - 0 Passed

Salary Resolution No. 8277

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved Resolution No. 8277, establishing a Salary Schedule and Compensation Plan for City Employees and rescinding Resolution No. 8199.

Vote: 5 - 0 Passed

Resolution No. 8285 National Opioids Settlement Agreements

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved Resolution No. 8285, regarding National Opioids Settlement Agreements; and authorized the Mayor to execute the two Settlement Agreements.

Vote: 5 - 0 Passed

Joint Defense and Confidentiality Agreement

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved the Joint Defense/Common Interest and Confidentiality Agreement with MLC Holdings, Inc. in connection with a legal challenge to the City's approval of the Bergamot Specific Plan Project.

Vote: 5 - 0 Passed

COMMUNICATIONS

Redlands Conservancy Update

Sherli Leonard presented an update relating to the City's partnership with the Redlands Conservancy and their continued collaboration on historic and preservation issues and open space management. She recapped various projects already accomplished as well as ongoing efforts. These included, assisted saving nine historic structures from demolition, successfully nominated three structures to the National Register of Historic Places; assisted the City adopt the Mills Act and become a Certified Local Government; restored more than a mile of historic cut-stone curbs; work at Herngt 'Aki' Preserve; collaboration with Facilities and Community Services to develop trail maps; work at San Timoteo Nature Sanctuary and work at Redlands Gateway Ranch. She thanked City staff and in particular, Director Boatman and Senior Manager Tabitha Kevari.

She highlighted the upcoming Fresh Air Challenge encouraging Redlanders to Walk a Million Miles in a Month. As co-sponsors, the City and the Redlands Conservancy are urging

participants to walk, run or bike any trail, path or sidewalk. She invited the public to attend the opening event on January 2, 2022 at Ed Hales Park. For additional information and to register, please refer to the following website: https://redlandsconservancy.org/challenge-2022/

Hometown Heroes Recognition

Council Member Foster commemorated military service members whose banners have been retired from the Redlands Hometown Heroes Military Banner Program. The program recognizes and honors Redlands residents and their immediate family members who are actively serving in, or have been honorably discharged from, the United States Armed Forces. With appreciation for their sacrifice associated with military service to our country, the following banners have been retired:

1. Jeffrey Gonzales, Navy - Banner flown over the streets of Redlands from March 2012 to March 2021
2. Kevin Martin, Air Force - Banner flown over the streets of Redlands from March 2012 to March 2021
3. Amanda Nixon, Air Force - Banner flown over the streets of Redlands from March 2013 to March 2021
4. Linda Villalpando, Air Force - Banner flown over the streets of Redlands from May 2012 to March 2021

Council District 5 Upcoming Vacancy

Mayor Pro Tem Tejeda reported on his outreach efforts to speak with the five former Council Members who live in District 5, Carole Beswick, William Cunningham, Kasey Haws, Mick Gallagher and Jerry Bean. He contacted each of them to determine their interest and availability for filling the upcoming vacancy. Based on the information gathered during phone interviews, he recommended the appointment of former Council Member Mick Gallagher to fill Paul Foster's vacant seat for the remainder of the term. Mr. Gallagher expressed understanding and agreement to not seek election to this position in November 2022 and shared his belief that there should not be an incumbent with an advantage over other candidates running in next year's election. Mr. Gallagher also has the greatest availability of those interviewed and fits the preferences expressed by Mr. Cunningham and Mr. Haws. Mayor Barich agreed with this recommendation after his conversations with each of the former Council Members.

Council Members Davis and Guzman-Lowery raised concerns this process lacked transparency and wondered if it was the best way to offer people the opportunity to demonstrate their competency. Council Member Foster suggested Mr. Gallagher would be willing to attend the December 21 meeting, where Council could hold an open and transparent dialogue. Council Members agreed this would provide a way for Council to be more comfortable with this recommendation.

Late Breaking Item - State's Redistricting Commission's Maps

Council Member Foster reviewed the California Citizens Redistricting Commission's proposed maps affecting Redlands for the State's Congressional and Legislative Districts. The draft maps currently split the City in half, and he urged the Council to consider authorizing the

Mayor to write a letter expressing the City's desire to remain under one Congressional and one State Assembly District. The Council Members voiced strong agreement to maintain one district.

On motion of Council Member Foster, seconded by Council Member Guzman-Lowery, the City Council unanimously authorized the Mayor to sign a letter directed to the California Citizens Redistricting Commission, expressing the City's desire to remain under one Congressional and one State Assembly District.

Vote: 5 - 0 Passed

PUBLIC HEARINGS

Historic Designation Redlands Masonic Lodge

Mayor Barich opened the public hearing and called upon Loralee Farris, of Development Services, for a summary of Resolution No. 8281, designating a three-story brick building as a Local Historic Resource. The building has been utilized as the Redlands Masonic Lodge and is located at 131 Cajon Street. With no further discussion, the Mayor closed the hearing.

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved Resolution No. 8281 (Historic Designation No. 137)**,** designating as a Local Historic Resource, a three-story brick building utilized as the Redlands Masonic Lodge located at 131 Cajon Street; and determined approval of the resolution is exempt pursuant to Section 15061(b)(3) of the State Guidelines implementing the California Environmental Quality Act.

Vote: 5 - 0 Passed

Resolution No. 8280 Street Vacation New York Street

Mayor Barich opened the public hearing and called on Development Services Director Desatnik, for a summary of a proposed street vacation, located within the Esri campus at 370 - 404 New York Street and included a proposed grant of Quitclaim Deed to release the City's pedestrian access easement between West State Street and New York Street to the property owner. One written comment was received from Southern California Gas Company and Director Desatnik confirmed the Gas Company's request that a permanent easement be reserved and excepted from this vacation, was accomplished through this action. With no further discussion, the Mayor closed the public hearing.

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously approved Resolution No. 8280, to vacate approximately 415 linear feet of public right-of-way adjacent to the frontage of the parcels identified as 370 - 404 New York Street in the Administrative Professional (A-P) District and situated within the ESRI campus, at the request of NYS, LLC; determined approval of this Quitclaim Deed to release the City of Redlands access easement is exempt from environmental review pursuant to Section 15061(b)(3) of the State's guidelines implementing the California Environmental Quality Act; and approved the Quitclaim Deed to release the City pedestrian access easement between West

State Street and New York Street to the property owner, NYS, LLC.

Vote: 5 - 0 Passed

Development Project Redlands Palm Investments, LLC

Mayor Barich opened the public hearing and called on Sean Reilly, of Development Services, for details of the project and a timeline of events related to the development applications from Redlands Palm Investments, LLC for a Planned Residential Development on approximately 6.8 acres consisting of 28 single-family residential lots located on the southeast corner of West Palm Avenue and Alvarado Street. On September 7, 2021, The City Council voted to recirculate the Mitigated Negative Declaration (MND) for 30 days to allow an additional opportunity for the public and State agencies to provide comments on the environmental document. The MND was recirculated from September 20 to October 19, 2021, with seven comments received, six from Redlands residents and one from San Manuel Band of Mission Indians.

A brief recess was taken at 8:07 P.M. The meeting reconvened at 8:30 P.M.

As public comment, Carole Beswick and Brett Waterman spoke in support of the development, stating the project will provide much needed housing for those who want to downsize, and they commended the developer for choosing to save the historic structures on the property. Richard O'Donnell, Thomas Cook, Dana Strunk, Luann Benton, Edith Allen (read by Ms. Benton), Kathleen Beall, John Beall, Elisabeth Longo, Andy Hoder and Jim Lynch voiced their perspectives in opposition to the project, citing reasons which included, the loss of a historic grove that is more than 100 years old and represents the City's agricultural heritage, zone designation conflicts with Measure U requirements, the integrity of the developer, increased traffic and noise and possible environmental contaminants, such as perchlorate and the need to undertake a full environmental impact study. It was also suggested the City should purchase the property in partnership with the Conservancy as a way to save the groves and preserve its legacy. Thirteen written comments, including one from John G. McClendon, of Leibold McClendon & Mann, were received. Each communicated their opposition to the project. City Attorney McHugh clarified the property had not been rezoned since the 1950s, and he added that evidence of contaminants, such as perchlorate, were not discovered in this area of town, but rather several years ago, such contaminants were found on the north side of town, with the discovery resulting in a settlement agreement with Lockheed.

The Applicant was represented by Peter Pitassi, Mark Ostoich and Matt Jordan. They stood behind LSA, the consultant who prepared the Initial Study and MND, declaring the company demonstrated expert technical competency. They added the project balanced a demand for more housing in the area yet respected the preservation of the historic structures and a portion of the groves, as well.

Mayor Barich closed the public hearing. Council Members were pleased the development managed to preserve the structures on the property and even though all the groves would not be saved, they saw value in the compromises made by Redlands Palm Investments. Mayor Barich thought the project would fit quite nicely in the neighborhood. Council Member Guzman-Lowery reminded everyone that preservation efforts were also needed on the north side of town.

On motion of Council Member Paul Foster, seconded by Council Member Denise Davis, the City Council unanimously approved Resolution No. 8242, to adopt a Mitigated Negative Declaration and Mitigation Monitoring/Reporting Program prepared for the proposed project in accordance with Section 15074 of the California Environmental Quality Act Guidelines; and to adopt Redlands Palm Investments, LLC development applications as follows: Socio-Economic Cost/Benefit Study prepared for the proposed project in accordance with Measure U; Tentative Parcel Map No. 20185 to subdivide an approximately 8.8 acre parcel into four lots described as follows: Parcel 1 (1.54 acres) for the preservation of an existing single family home located on West Palm Avenue; Parcel 2 (0.45 acre) for the preservation of existing citrus grove located at the southeast corner of West Palm Avenue and Alvarado Street; Parcel 3 (0.82 acre) for the preservation of an existing single-family home located on Alvarado Street; Parcel 4 for the creation of a 6.0-acre portion to be further subdivided by Tentative Tract Map No. 20305 into 28 residential lots. The subject parcel is located at 301 West Palm Avenue (APN: 0173-231-05-0000); Conditional Use Permit No. 1143 for a Planned Residential Development on approximately 6.8 acres consisting of 28 single-family residential lots and five open space lots located on the southeast corner of West Palm Avenue and Alvarado Street, in the Residential Suburban (R-S) District; Tentative Tract Map No. 20305 to subdivide Parcels 3 and 4 (6.82 acres) of Tentative Parcel Map No. 20185 into 28 lots for future single-family residential development and five lettered lots for open space, located on the southeast corner of West Palm Avenue and Alvarado Street, in the Residential Suburban (R-S) District; Variance No. 810 to deviate from the required yard requirements contained in Redlands Municipal Code Section 18.152.040 (Exceptions for Large Scale Developments; Yard Variances for Housing) which states that the front yard requirements may be varied by not more than five feet (5') in either direction, provided that the average front yard for the entire frontage is not less than that required in the district. Approval of the requested Variance would allow a minimum front yard setback of 18 feet and a maximum setback of 62 feet, and would affect lots 6 and 8 in the proposed Tentative Tract Map No. 20305: Variance No. 811 to deviate from Redlands Municipal Code Section 18.152.070(G)(1) (Exceptions for Projections into Yards) which allows for portions of a main building on a residential lot to project into the rear yard setback to within 10 feet of the rear property line, provided that the projection is less than 30 feet wide, and if rear yard open space is provided with a minimum dimension of 15 feet and area of 2,100 square-feet. Approval of the requested Variance would allow a reduction to the required minimum rear yard open space to 1,112 square-feet, and would affect a total of 20 lots in the proposed Tentative Tract Map No. 20305.

Vote: 5 - 0 Passed

NEW BUSINESS

Contract Award 2021 CIP Sewer Pipeline Replacement Project

Municipal Utilities and Engineering Director Harris introduced a construction contract for the 2021 CIP Sewer Pipeline Replacement Project.

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Jenna Guzman-Lowery, the City Council unanimously determined that approval of a Construction Contract with Southwest Pipeline and Trenchless Corp. for the 2021 CIP Sewer Pipeline Replacement Project is categorically exempt from environmental review in accordance with Section 15302 of the State's guidelines implementing the California Environmental Quality Act; approved the 2021 CIP Sewer Pipeline Replacement Project plans and specifications; and

awarded a Construction Contract with Southwest Pipeline and Trenchless Corp. in the amount of $309,852.

Vote: 5 - 0 Passed

2020 CIP Water Pipeline Replacement Project Amendment

Municipal Utilities and Engineering Director Harris explained the need to amend the 2020 CIP Water Pipeline Replacement Project Contract with Tryco General Engineering. The Consultant's compensation will be increased by $308,400.

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Denise Davis, the City Council unanimously approved the First Amendment to the 2020 CIP Water Pipeline Replacement Project Contract with Tryco General Engineering to increase the Consultant's compensation by $308,400.

Vote: 5 - 0 Passed

Resolution No. 8271 WWTP Upgrades Project

On motion of Mayor Pro Tempore Eddie Tejeda, seconded by Council Member Paul Foster, the City Council unanimously approved Resolution No. 8271, adopting a Mitigated Negative Declaration and Mitigation Monitoring/Reporting Program prepared for the proposed Redlands Wastewater Treatment Plant Upgrades Project; approving the plans and specifications for the Project; and authorizing the Project's undertaking by the City.

Vote: 5 - 0 Passed

Water Distribution System SCADA Upgrade Project

On motion of Council Member Jenna Guzman-Lowery, seconded by Council Member Denise Davis, the City Council unanimously determined that approval of the agreement with TESCO Controls, Inc. for the FY 21/22 Water Distribution System SCADA Upgrade Project is exempt from environmental review pursuant to Section 15301 of the State's guidelines implementing the California Environmental Quality Act; and approved the agreement to perform non-professional services for improvement to public buildings and grounds with TESCO Controls, Inc. for the FY 21/22 Water Distribution System SCADA Upgrade Project in an amount not-to-exceed $3,679,720.

Vote: 5 - 0 Passed

Redlands Gateway Ranch Project

On motion of Council Member Jenna Guzman-Lowery, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously determined approval of the License Agreement with David Roche Construction to construct an open canopy on City property located at 31313 Live Oak Canyon Road, Redlands Gateway Ranch, is exempt from environmental review pursuant to Section 15303(e) of the State's Guidelines implementing the California Environmental Quality Act; and approved the License Agreement with David Roche.

Vote: 5 - 0 Passed

Pickleball Courts

Facilities and Community Services Director Boatman discussed the construction contract with Three Peaks Corporation for the conversion of two tennis courts into eight pickleball courts at the Redlands Community Center. One of the fastest-growing sports within the City is pickleball with the Recreation division experiencing significant growth in pickleball court use and demand for facilities. To address the increased demand, the Parks and Recreation Advisory Commission identified the construction of additional pickleball facilities as first on their list of priorities. As public comment, Bob Mitchell, a member of USA Pickleball, urged the Council to move forward with the proposed project.

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council unanimously determined that the project is categorically exempt from environmental review in accordance with Sections 15301(e) and 15304(a) of the State's guidelines implementing the California Environmental Quality Act; approved an additional appropriation in the amount of $100,387 from the unappropriated fund balance for the Parks and Recreation category of the Nevada Palmetto reserve; approved an additional appropriation in the amount of $88,773 from the Park Development Fund; and awarded a construction contract with Three Peaks Corporation in the amount of $309,160 for the conversion of tennis courts to pickleball courts at the Redlands Community Center.

Vote: 5 - 0 Passed

Oriental Avenue Renaming

Catherine Lin, of Development Services, recapped staff's efforts related to a request to consider renaming Oriental Avenue. She provided detailed background of the research performed and a review of the written public comments received.

As public comment, Margaret Paul suggested the Council reflect on the cultural heritage of area. Melissa Fisher, of Escape Craft Brewery and who is half Chinese, stated she does not find the street name offensive, and she recommended Council not erase history, but strive to understand the past. Robb McDermott had collected over 10,000 electronic signatures for his petition to rename the street to Al Harris Avenue, the Kirkorian employee beloved by many, and he briefly described his plan to establish educational monuments that would honor the history of the area. Andy Hoder was not in support of renaming Oriental Avenue but did ask Council to consider changing Shopper's Lane to Al Harris Avenue.

A lengthy Council Member discussion followed. Topics discussed included whether staff should continue to do more community outreach. Council Members Davis and Guzman-Lowery were uncomfortable making a decision tonight and wanted more time to better determine what other cities have done. Council Member Davis wondered if the City could pay for costs incurred by the two businesses that would be directly affected if the street were to undergo a name change. City Manager Duggan clarified this could be accomplished if the Council determined the finding was in the publics' interest and served all the people.

On motion by Council Member Guzman-Lowery, seconded by Council Member Davis, the

City Council failed to table the matter for future Council consideration, due to lack of a majority. Mayor Barich, Mayor Pro Tem Tejeda and Council Member Foster voted NO. The motion failed.

On motion of Council Member Paul Foster, seconded by Mayor Pro Tempore Eddie Tejeda, the City Council approved to retain the street name of Oriental Avenue the same

Vote: 3 - 2 Passed

NAY: Council Member Denise Davis
Council Member Jenna Guzman-Lowery

COUNCIL MEMBER ANNOUNCEMENTS AND ACTIVITIES

Mayor Barich attended the Redlands Police Department Welcome Aboard and Promotions Ceremony held earlier in the day and was proud to honor Dr. Donald Robinson, pastor of the Community Missionary Baptist Church in Redlands, for over 50 years of preaching the Gospel.

ADJOURNMENT

The meeting was adjourned at 10:25 P.M. in honor of Clara Mae Clem, philanthropist and life-long resident of Redlands. A teacher for forty years, she was passionate about education, always encouraging young people. She had numerous business and real estate interests and was a notable supporter of many charities including Family Service Association, the Salvation Army, and she was a major contributor to the University of Redlands and the Museum of Redlands (MOR). To establish the future home of MOR, she even purchased the old Redlands Daily Facts building at Brookside Avenue and Center Street. The next regular meeting of the City of Redlands City Council will be held on December 21, 2021.

SUCCESSOR AGENCY OF THE FORMER REDEVELOPMENT AGENCY OF THE CITY OF REDLANDS

Chairman Barich called the meeting to order and offered anyone present the opportunity to address the Board on any subject, not already on the agenda, within the jurisdiction of the Successor Agency.

PUBLIC COMMENT

None forthcoming

Minutes

On motion of Board Member Foster, seconded by Vice Chair Tejeda, the minutes of the regular meeting of November 2, 2021 were unanimously approved.

Vote: 5 - 0 Passed

ADJOURNMENT

There being no further business, the Successor Agency Board of Directors' meeting was adjourned at 10:26 P.M.