CITY OF HIGHLAND
REGULAR MEETING OF THE PLANNING COMMISSION AGENDA

REGULAR MEETING

January 4, 2022
6:00 p.m.
City Hall
Donahue Council Chambers
27215 Base Line
Highland, California

MEMBERS

Randall Hamerly, Chair
Chandra Thomas, Vice Chair
Edward Amaya, Commissioner
Jarrod Miller, Commissioner
Jessica Sutorus, Commissioner

STAFF

Lawrence A. Mainez, Community Development Director
Kim Stater, Assistant Community Development Director
Ash Syed, Associate Planner
Angela Tafolla, Assistant Planner
Angelica Martinez, Planning Technician II
Camille Goritz, Administrative Assistant III

MISSION STATEMENT

Highland is dedicated to the betterment of the individual, the family, the neighborhood and the community. The City Council and the staff of Highland are dedicated to providing the quality of public facilities and services that its citizens are willing to fund and will do so as efficiently as possible.

Visit the City's Website at: www.cityofhighland.org

CITY OF HIGHLAND • 27215 BASE LINE • HIGHLAND, CALIFORNIA 92346 • (909) 864-6861☎ • (909) 862-3180 🖷

The City of Highland complies with the Americans with Disabilities Act of 1990. If you require special assistance to attend or participate in this meeting, please call the City Clerk's Office at (909) 864-6861 Ext. 226, at least 48 hours prior to the meeting.

Pursuant to Government Code Section 54957.5, any disclosable public records related to an open session item on a regular meeting agenda and distributed by the City of Highland to all or a majority of the Planning Commission, less than 72 hours prior to that meeting, are available for public inspection at Highland City Hall, 27215 Base Line, Highland, CA 92346, during normal business hours.

Submission of Public Comments: To limit the number of persons in the Council Chambers, the public is encouraged to make public comments by email rather than in person. For those wishing to make public comments by email to be read aloud at the meeting by the Community Development Administrative Assistant. Email comments must be submitted by 5:00 p.m. on January 4, 2022 to publiccomment@cityofhighland.org.

For those wishing to make a public comment regarding a public hearing item, please identify the agenda item in the subject line. Comments can be submitted any time prior to the meeting, as well as during the meeting up until the end of the corresponding item. Please email your comments to publiccomment@cityofhighland.org. Members of the public will be permitted to make public comments in person.

PLANNING COMMISSION
REGULAR MEETING AGENDA
January 4, 2022 - 6:00 P.M.

CALL TO ORDER

PLEDGE OF ALLEGIANCE

COMMUNITY INPUT (ITEMS NOT ON THE AGENDA)

To address the Planning Commission, please complete a speaker form located at the entrance and give it to the Administrative Assistant prior to the beginning of the meeting. Your name will be called when it is your turn to speak. Individual speakers are limited to three minutes each. Comments received via email by January 4, 2022, 5:00 p.m., will be read into the record, provided that the reading shall not exceed three (3) minutes.

PUBLIC HEARING

1. Conditional Use Permit application for an Alcohol Beverage Control License (Type 41 On-Sale Beer and Wine) at an existing full-service Mountain Mike's Restaurant. (27967 Greenspot Road, Unit # 4)

   RECOMMENDATION: Staff recommends the Planning Commission adopt Resolution No. 2022-___ approving Conditional Use Permit 21-009 to establish an Alcohol Beverage Control License (Type 41 On-Sale Beer and Wine) at an existing

full-service Mountain Mike's Restaurant, subject to the Conditions of Approval, and the Findings of Fact.

2. Supplementary review of the Landscape Plan, Mediterra Park amenities, a lockable gate at the 1N16 Trail entrance, and entry statements along Mediterra Parkway related to the approved Design Review Application (DRA 21-007) for 149 single-family homes within Phases 1 & 2 of the Mediterra Planned Development. (APN: 0297-021-25, 0297-021-26, 0297-021-27 & 0297-021-28)

RECOMMENDATION: Staff recommends the Planning Commission approve revisions to the project as part of the Conditions of Approval for Resolution No. 2021-014.

3. General Plan Amendment No. GPA 21-003 to amend three (3) Elements of the Highland General Plan including Adoption of the Sixth (6th) Cycle 2021-2029 Housing Element, Update to the Public Health, Safety, and Environmental Justice Element, and minor amendment of the Circulation Element. (City Wide)

RECOMMENDATION: Staff recommends the Planning Commission adopt Resolution No. 2021-___ recommending the City Council approve General Plan Amendment No. GPA 21-003 to:

a. Adopt the Sixth (6th) Cycle Housing Element for the 8-year planning period of 2021-2029;

b. Adopt the updated Public Health, Safety and Environmental Justice Element;

c. Adopt an Amendment to the Circulation Element deleting two (2) street extensions; and

d. Adopt a Negative Declaration and direct Staff to file a Notice of Determination with the Clerk of the Board of Supervisors and State Clearinghouse.

ANNOUNCEMENTS

ADJOURN

I, Camille Goritz, Administrative Assistant III of the City of Highland, California, certify that I caused to be posted this agenda on or before the 29th of December 2021 by 5:30 p.m. on our website at www.cityofhighland.org and in the following designated areas:

Highland Branch Library
7863 Central Avenue

Fire Station No. 1
26974 Base Line

City Hall
27215 Base Line

Date: December 29, 2021

Camille Goritz Administrative Assistant III

STAFF REPORT

TO THE PLANNING COMMISSION

DATE: January 4, 2022

FROM: Lawrence A. Mainez, Community Development Director

REVIEWED BY: Kim Stater, Assistant Community Development Director

PREPARED BY: Angela Tafolla, Assistant Planner AT

SUBJECT: Conditional Use Permit application for an Alcohol Beverage Control License (Type 41 On-Sale Beer and Wine) at an existing full-service Mountain Mike's Restaurant.

LOCATION: Mountain Mike's Restaurant
27967 Greenspot Road, Unit #4, Highland, CA 92346
(APN: 1201-341-61-0000)

REPRESENTATIVE: Amber Johnson, Mountain Mike's Restaurant

RECOMMENDATION: Staff recommends the Planning Commission adopt Resolution No. 2022 – ____ approving Conditional Use Permit 21-009 to establish an Alcohol Beverage Control License (Type 41 On-Sale Beer and Wine) at an existing full-service Mountain Mike's Restaurant, subject to the Conditions of Approval, and the Findings of Fact.

PUBLIC NOTICE: A Public Hearing Notice was published in the Highland Community News on December 24, 2021. The Notice was posted on the City's website and at the three (3) designated public posting locations per City Council Resolution. The Project notice was mailed to interested agencies and property owners within 300 feet of the site on December 7, 2021. The Notice of Public Hearing was mailed to interested agencies and property owners within 300 feet of the site on December 22, 2021.

Approved _____ Motion _____ Second _____ Agenda Item No. 1

Denied _____ Ayes _____

Continued _____ Noes _____ File No. _____

Tabled _____ Abstain _____

Absent _____

Recording Secretary

Community Development Director

ENVIRONMENTAL: Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the project is categorically exempt per Section 15301, Class 1, Existing Facilities because it consists of the operation of an existing structure involving negligible expansion of the use. No further environmental review required.

BACKGROUND/PROPOSAL: The Applicant is currently operating a Mountain Mike's Restaurant serving pizza, chicken wings, sandwiches, and other selections. The restaurant is located in an established commercial center known as the Highland Crossroads. The commercial center consists of three (3) adjoining parcels with a total of nine (9) adjacent tenant spaces occupied by Esporta, Jamba Juice, Jersey Mikes Subs, Wing Stop, Trendsetters Salon, Lindora Clinic, Nutrishop and one (1) vacant unit.

Mountain Mike's Restaurant is located on a 1.31-acre parcel at the very west end of the center and occupies 2,913 square feet of tenant space with 1,027 square feet of indoor dining and 495 square feet of patio dining area. The outdoor dining area provides seating for approximately sixteen (16) customers consisting of four (4) tables and sixteen (16) chairs. The patio area is situated directly in front of the restaurant, as part of an existing covered patio, incorporated into the architectural design of the center and enclosed on three (3) sides. To assist in the control of alcohol consumption by minors the patio has been fortified with an approximately five-foot (5') wall comprised of a three foot (3') dry-glazed glass railing attached to a two-foot (2') solid masonry wall located along the perimeter of the patio. The said wall provides screening for patio dining customers and separates the area from the adjacent parking lot and pedestrian walkway. In addition to the patio walls the restaurant cash register/ordering counter is in direct view of the patio area to further assist in the monitoring of alcohol consumption. Customers enter/exit the patio through the restaurant dining area and in the event of an emergency customers may exit through a three foot (3') wrought iron emergency only access gate located on the east side of the patio. Mountain Mike's Restaurant will maintain this area and ensures they will comply with all requirements of the Department of Alcoholic Beverage Control. The restaurant is open from 11:00 a.m. to 10:00 p.m. Monday through Sunday and the approval of the Type 41 ABC license will not change the current hours of operation.

The north side of the building faces the parking lot for the plaza and the south side faces Plunge Creek berm. The site is served and accessed by the way of Greenspot Road from the north side with the intersection containing the primary entrance to Highland Crossroads Plaza featuring a traffic signal to control traffic flow. Uses surrounding the site, along with their General Plan and corresponding zoning designations, are outlined in the following table:

	Existing Use	General Plan Designation	Zoning Designation
Site	Commercial Center	Planned Development	Planned Development (PD)
North	Gas Station/Mini Mart	Planned Development	Planned Development (PD)

South	Plunge Creek	Open Space	Open Space (OS) & Planned Development (PD)
East	Commercial Center	Planned Development	Planned Development (PD)
West	Office Supply Store	Planned Development	Planned Development (PD)

The project site is located within the Planned Development zoning district of the Highland Crossroads Plaza which includes commercial uses that permit restaurants serving alcoholic beverages subject to approval of a conditional use permit.

ANALYSIS:

ABC License

The Department of Alcohol and Beverage Control (ABC) is the public agency which issues licenses to sell alcohol in the State of California. State law which regulates the issuance of ABC licenses includes provisions aimed at avoiding what is termed an "undue concentration" of licenses in any specific geographic area. ABC utilizes census tracts as the statistical subdivision to track and determine the number of licenses to be issued.

The project site is located within the boundary of Census Tract 76.04 (See Exhibit D - Census Tract 76.04), which ABC authorizes a maximum of (6) "on sale" license for this geographic area. As of 2021, the number of businesses with "on sale" licenses is seven (7). Existing licenses are:

Business Name	***Address***	***License Type***	***License Description***
Thai Spoon	7750 Palm Ave, Ste H	Type 41	On-Sale Beer & Wine
The Green Frog	7750 Palm Ave, Ste K&L	Type 48	On-Sale General
Wingstop	27993 Greenspot Rd. Ste. 4	Type 41	On-Sale Beer & Wine
Third Street Station	26998 3rd Street	Type 48	On-Sale Beer & Wine
JJ's Sports Bar & Grill	7955 Webster Street	Type 47	On-Sale General
Dicky's Barbeque Pit	27949 Greenspot Rd, Ste D	Type 41	On-Sale Beer & Wine
I Love Sushi	7750 Palm Ave. Ste. S	Type 41	On-Sale Beer & Wine

Of the seven (7) existing on sale licenses in Census Tract 76.04 one is issued to Wingstop a restaurant located in the same shopping center as Mountain Mike's. The Census Tract 76.04 lists Thai Spoon, The Green Frog, I Love Sushi, Wingstop, Third Street Station, JJ's Sports Bar & Grill, and Dickey's Barbeque Pit as the seven (7) existing active ABC license holders. The number of authorized ABC licenses is currently at 117 percent of the permitted concentration as set by ABC for Census Tract 76.04. The approval of a Type 41 ABC license for Mountain Mike's would increase the number of businesses with "on sale" licenses to eight (8), 133 percent of the permitted concentration for Census Tract 76.04. This would lead to an "undue concentration" of ABC licenses.

The Applicant has provided a letter of justification defining how beer and wine sales "will complement the existing menu and enhance business". Additionally, on June 22, 2021, the City Council approved Conditional Use Permit No. 20-006 for five (5) on-sale Alcohol Beverage Control License (Type 41 & 47) on the north side of Greenspot Road, east of the 210 freeway. These are speculative licenses for tenants not yet identified in the TREH Partners Mixed Use project. As they are speculative, they were not included in the count of existing license.

FINDING FOR PUBLIC CONVENIENCE OR NECESSITY

According to the Business and Professions Code a jurisdiction must make a finding of "public convenience or necessity" if there is an overconcentration of similar liquor licenses within the census tract associated with the project. Mountain Mike's is located within a Planned Development zoning district in the Highland Crossroads Plaza. The addition of an ABC license will enhance the full dining experience for customers and will also boost revenue for the establishment. Additionally, the current lack of an ABC license and availability of alcohol on the menu may be detrimental to the business as many dine-in guests may be specifically seeking an alcoholic beverage and thus, take their business to another establishment. For this reason, staff finds the addition of an ABC license a "public convenience or necessity".

The Sherriff's Department provided a crime report for the Police District (District HI211) where the business is located. The Sherriff's Departments total calls for service within the time frame of January 1, 2015, through November 2021 was two (2), both calls were in response to false alarms for existing businesses. Based on the number of calls for service, the Sherriff's Department did not provide staff with any written comments in the opposition of the ABC license request. Therefore, by this standard, there is not an "undue concentration" of crimes based on the crime statistic. Staff has considered all possible concerns thought to be relevant to this business's operation. Mountain Mike's Restaurant is a family restaurant that caters to the local neighborhood. There is not any concentration of similar business within a mile at minimum of this site, making the options for a liquor license readily compliant with the State's Business Code and ABC.

Exhibits:
A. Project Location Aerial Map
B. Site Plan
C. Floor Plan
D. Census Tract 76.04 map

Attachments:
1. Letter of Justification from Applicant
2. Resolution 22 – ___ for Conditional Use Permit (CUP-21-009)
   A. Conditions of Approval

Exhibit "A"



Exhibit "B"

Site Plan

MOUNTAIN MIKE'S PIZZA

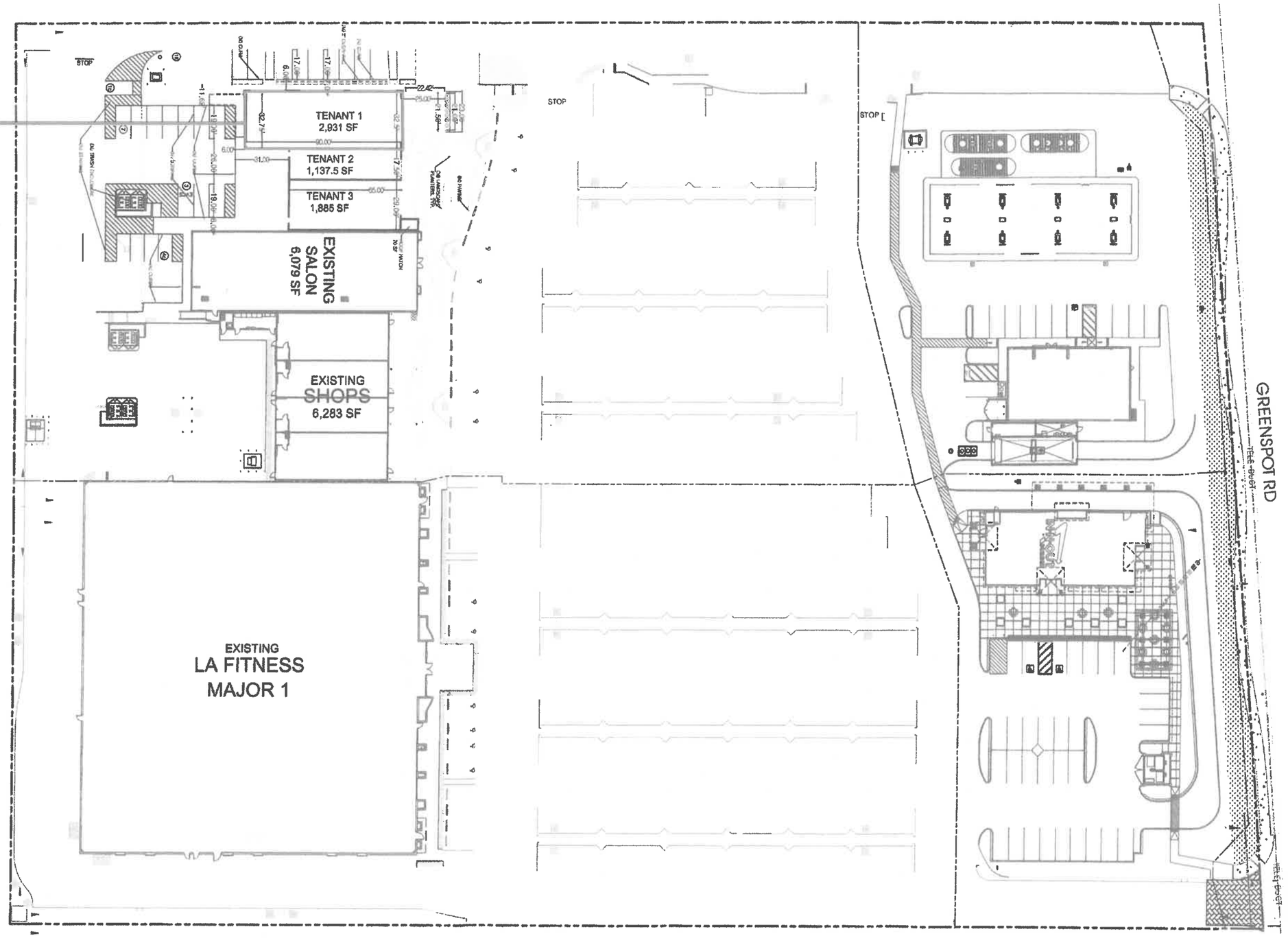


Exhibit "C"

Floor Plan

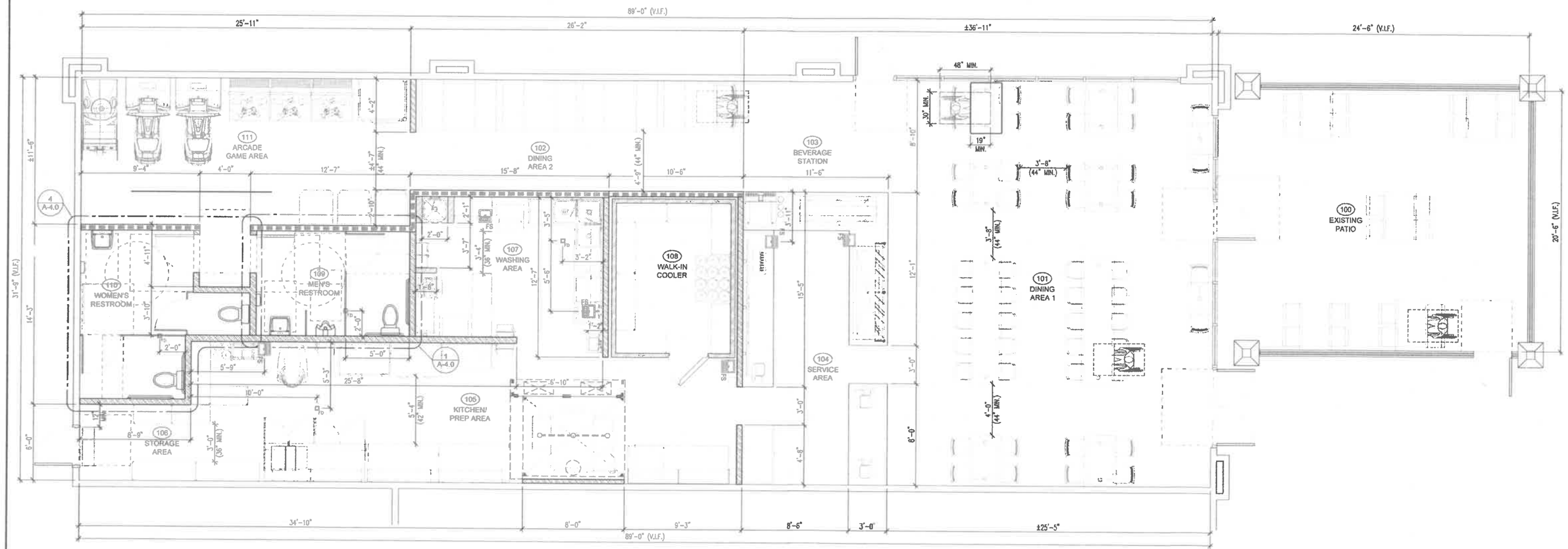
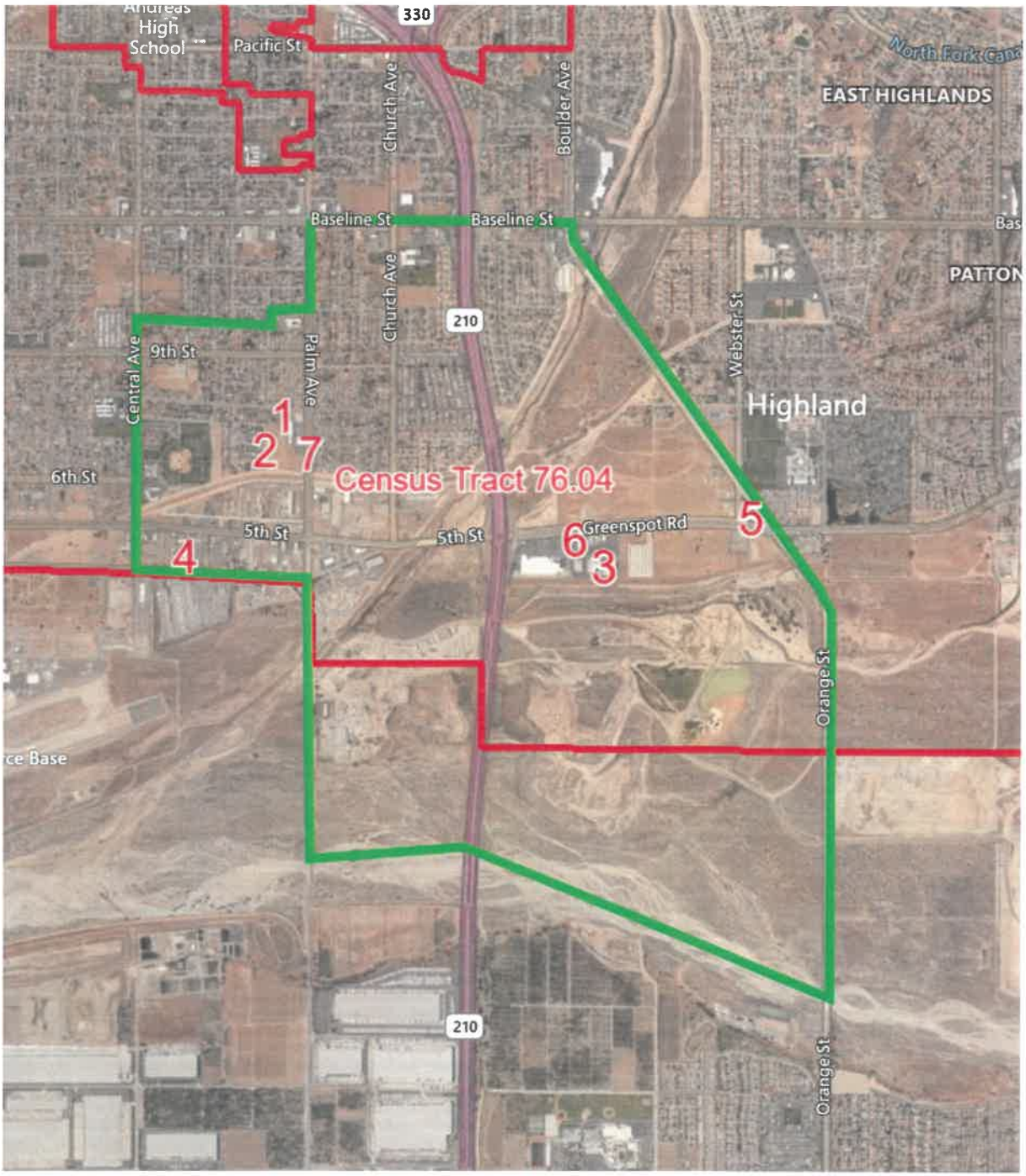

89'-0" (V.I.F.)
25'-11"
26'-2"
±36'-11"
24'-6" (V.I.F.)
±11'-6"
31'-9" (V.I.F.)
14'-3"
6'-0"
20'-6" (V.I.F.)
111 ARCADE GAME AREA
9'-4"
4'-0"
12'-7"
4'-2"
4'-7" (44" MIN.)
102 DINING AREA 2
15'-8"
4'-9" (44" MIN.)
10'-6"
103 BEVERAGE STATION
11'-6"
8'-10"
48" MIN.
30" MIN.
19" MIN.
3'-8" (44" MIN.)
3'-8" (44" MIN.)
100 EXISTING PATIO
101 DINING AREA 1
110 WOMEN'S RESTROOM
109 MEN'S RESTROOM
4'-11"
3'-10"
2'-0"
5'-8"
5'-3"
2'-0"
5'-0"
25'-8"
107 WASHING AREA
2'-1"
3'-5"
3'-4" (36" MIN.)
3'-2"
12'-7"
5'-6"
108 WALK-IN COOLER
12'-1"
15'-5"
3'-11"
104 SERVICE AREA
3'-0"
8'-0"
4'-8"
4'-0" (44" MIN.)
105 KITCHEN/ PREP AREA
5'-4" (42" MIN.)
6'-10"
10'-0"
106 STORAGE AREA
6'-9"
3'-0" (36" MIN.)
34'-10"
6'-0"
9'-3"
8'-6"
3'-0"
±25'-5"
89'-0" (V.I.F.)
4 A-4.0
1 A-4.0

Exhibit “D”

Census Tract 76.04



	Business Name	***Address***	***License Type***	***License Description***
1	Thai Spoon	7750 Palm Ave, Ste H	Type 41	On-Sale Beer & Wine
2	The Green Frog	7750 Palm Ave, Ste K&L	Type 48	On-Sale General
3	Wingstop	27993 Greenspot Rd. Ste. 4	Type 41	On-Sale Beer & Wine
4	Third Street Station	26998 3rd Street	Type 48	On-Sale Beer & Wine
5	JJ's Sports Bar & Grill	7955 Webster Street	Type 47	On-Sale General
6	Dicky's Barbeque Pit	27949 Greenspot Rd, Ste D	Type 41	On-Sale Beer & Wine
7	I Love Sushi	7750 Palm Ave. Ste. S	Type 41	On-Sale Beer & Wine

Attachment 1

Letter of Justification from Applicant

CITY OF HIGHLAND
Conditional Use Permit
Business Operation
27967 Greenspot Rd., Suitet 4, Highland, CA 92346

Mountain Mike's Pizza was established in 1978 in Palo Alto, CA. What started as a single pizza restaurant with a casual, family-friendly atmosphere has since grown into a leading pizza brand. With over 40 years in business, Mountain Mike's Pizza now has more than 200 restaurants across California, Oregon, Nevada, and Utah. From the very beginning, we aimed to provide the highest-quality pizza using only the freshest and finest ingredients available.

Mountain Mike's Pizza is located on a newly commercially zoned' and developed section of Greenspot Rd and Boulder Ave. The surrounding area has compatible and similar uses that of the proposed use. The subject property is classified as commercial. The property is located and designed to encourage business and job growth within the city. We offer a variety of items on our menu for customers to choose from. Parking will be provided on site.

The requested use at the proposed location will not adversely affect the economic welfare of the nearby community. This request will only benefit the community. We offer an upscale restaurant to our community. We employ approximately 10 — 20 people at each location. 3 — 8 employees per shift. Hours of operation will be limited to 11am — 10pm 7 days a week. Security cameras will be on site and running on a 24-hour loop. All alcohol will be kept behind the counter. Our POS register system will automatically prompt the ID check on all alcohol purchases.

This location will not be materially detrimental to the use, enjoyment of property of other persons located in the vicinity of the site. Residential zoned and developed properties are buffered from sight and sound of other surrounding businesses, streets, highways and vacant land. This proposed request to include beer and wine in a proposed up-scale pizza restaurant will have no noise impact beyond what normally occurs for this type of use. These properties will not be affected by allowing beer and wine at an up-scale restaurant within their community.

The approval of the conditional Use Beverage will not jeopardize, endanger or otherwise constitute a menace to the public health, safety, or general welfare. Since this business is unique in the immediate area. Traffic will not be an issue at this subject property. Ample parking is provided on site. This request will only enhance the thriving area of this community. In addition, this business will bring jobs within the community to create economic growth in this area.

Attachment 2

Resolution 2022 - ____ for Conditional Use Permit No. 21-009

RESOLUTION NO. 2022 -

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, APPROVING CONDITIONAL USE PERMIT NO. 21 – 009 TO PERMIT THE ESTABLISHMENT OF AN ALCOHOL BEVERAGE CONTROL LICENSE, TYPE 41, FOR ON-SALE BEER AND WINE LICENSE AT A BONA FIDE PUBLIC EATING KNOWN AS MOUNTAIN MIKE'S, LOCATED AT 27967 GREENSPOT ROAD UNIT 4, HIGHLAND, CA 92346. (APN: 1201-341-61)

APPLICANT: EMPIRE PIZZA INCORPORATED

A. RECITALS

1. On December 2, 2021, the Applicant applied for a Conditional Use Permit (CUP 21-009) to permit the establishment of a Type 41 On-Sale Beer and Wine License for a Mountain Mike's restaurant located at 27967 Greenspot Road Unit 4, Highland, CA 92346 (APN: 1201-341-61).

2. The site is located within the Highland Crossroads Plaza south of Greenspot Road and has a Zoning Designation of Planned Development.

3. Pursuant to California Environmental Quality Act, the Project is Categorically Exempt per the CEQA Guidelines, Section 15301, Class 1 Existing Facilities. There is no further environmental review required.

4. On January 4, 2022, the Planning Commission of the City of Highland conducted a Public Hearing at the City Hall Council Chambers in Highland, California, at 6:00 p.m.

5. All legal prerequisites to the adoption of this Resolution have occurred.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

Section 1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

Section 2. The City of Highland Planning Commission after due consideration, inspection, investigation, and study made by itself and on its behalf, and after due consideration of all evidence and reports offered at said meeting, including the staff report to the Planning Commission dated January 4, 2022, which is incorporated herein by this reference, does find and determine the following facts:

a. All necessary Public Hearings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

Section 3. Findings of Fact (Conditional Use Permit)

a. Highland Municipal Code (HMC) Section 16.80.50.E.1, the proposed use and activity are permitted within the subject district pursuant to the provisions of this section and complies with all the applicable provisions of this title; and is consistent with the goals, policies, and objectives of the Highland General Plan, and the applicable development policies and standards of the city.

Response: The proposed use of a restaurant with alcohol sales consumption is allowed within the Planned Development zoning district subject to approval of a conditional use permit in the shopping center for retail uses. The applicant is proposing to establish a Type 41 On-Sale Beer and Wine License for a Bona Fide Public Eating Place to include beer and wine selections with their menu offerings.

This proposal is consistent with the current zoning designation of PD (Planned Development). The current General Plan designation for the subject site is Planned Development as well as the site's overarching land use approval as a multi-tenant commercial center, Conditional Use Permit No.10-002. The city has reviewed the application and conditions of approval have been attached to the project to ensure compliance with applicable development policies and standards of the city.

b. HMC Section 16.80.50.E.2, the proposed use would not impair the integrity and character of the district in which it is to be established or located.

Response: As noted above, the existing restaurant is allowed within the Planned Development zoning district and Conditional Use Permit No. 10-002. The applicant believes the establishment of a Type 41 Alcohol Beverage Control license will enhance the dining experience, by providing patrons the choice to enjoy a glass of beer or wine with their meal. The existing business hours shall remain as they are, 11:00 a.m. to 10:00 P.m. Monday through Sunday. The proposed use is permitted within the zoning district subject to approval of a conditional use permit.

Since the operational characteristics of the business (a restaurant) would remain unchanged, approval of this request would result in the expansion of the menu to include beer and wine selections, contributing

to the economic benefit to the business and the City. The proposal would not impair the integrity or character of the district in which it is to be established.

c. HMC Section 16.80.50.E.3, the site is suitable for the type and intensity of use or development which is proposed.

Response: As noted above restaurants are an allowed use within the district in which the project site is located. Restaurants which serve alcohol are a permitted use within the zoning district, subject to approval of a conditional use permit. The subject application has been reviewed in compliance with the Highland Municipal Code and appropriate conditions of approval have been applied to the project.

d. HMC Section 16.80.50.E.4, there are adequate provisions for water, sanitation, and public utilities and services to ensure public health and safety.

Response: The project site is currently served by water, sewer, public utilities, and by the City of Highland Fire and Police Departments. There are adequate provisions for water, sanitation, and public utilities and services to ensure public health and safety.

e. HMC Section 16.80.50.E.5, the proposed use will not be detrimental to the public health, safety, or welfare, or materially injurious to properties and improvements in the vicinity.

Response: The applicant is proposing to include beer and wine service at the new restaurant with the establishment of a Type 41 Alcohol Beverage Control License. The sale of alcohol is ancillary to the restaurant use and is allowed within the Highland Crossroads Plaza and associated Conditional Use Permit that established the center, subject to approval of a conditional use permit. The subject application has been reviewed in compliance with the Highland Municipal Code and appropriate conditions of approval have been applied to the project.

f. HMC Section 16.80.50.E.6, the proposed use would not result in a significant effect on the environment.

Response: The restaurant will be contained within an existing commercial building. No expansion of the building is proposed as part of the project and establishment of a Type 41 Alcohol Beverage Control License will not result in an effect on the environment and is categorically exempt from further analysis per CEQA Section 15301 Existing Facilities.

g. Business and Professions Code Section 23958 finding of "public convenience or necessity":

Response: The applicant is proposing to establish an Alcoholic Beverage Control (ABC) Type 41 (On-Sale Beer and Wine License for a Bona Fide Public Eating Place) License. According to the Business and Professions Code, a jurisdiction must make a finding of "public convenience or necessity" if there is an overconcentration of similar liquor licenses within the census tract associated with the project. Based on the data from ABC there will be an over overconcentration of ABC licenses within this project area's census tract. A "public convenience or necessity" finding is appropriate and hereby made to enhance the full dining experience for customers will increase revenue for the establishment.

Section 4. Based on the findings of fact and conclusions set forth above, the Planning Commission approves CUP 21-009 to permit the establishment of a Type 41 On-Sale Beer and Wine License for Mountain Mike's, located at 27967 Greenspot Road Unit 4, Highland, CA 92346 (APN: 1201-341-61) by adopting the conditions of approval attached.

C. ADOPTION OF RESOLUTION.

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

PASSED, APPROVED AND **ADOPTED** this 4th day of January, 2022.

ATTEST:

Randall Hamerly, Chairman Planning Commission	Lawrence A. Mainez Community Development Director

ATTACHMENT "A"

CITY OF HIGHLAND
PLANNING DIVISION CONDITIONS OF APPROVAL

Date: December 22, 2021

Applicant: Mountain Mike's

Project No: Conditional Use Permit No. 21-009

Proposal: A proposal to consider the establishment of an Alcohol Beverage Control License (Type 41 On-Sale Beer and Wine) to an existing full service Mountain Mike's Restaurant.

Location: 27967 Greenspot Road, Unit #4, Highland, CA 92346
(APN: 1201-341-61)

PLANNING CONDITIONS

These conditions of approval represent the Planning Divisions conditions of approval and are meant to be one part of overall conditions of approval that may include, Engineering, Building and Safety, Fire Department, and other agency conditions of approval.

The conditions below are continuing conditions. Failure of the applicant and/or operator to comply with any or all said conditions at any time shall result in the revocation of this permit granted to use the subject property.

1. This Conditional Use Permit approval shall become null and void:

    a. Unless all conditions have been complied with and the occupancy or use of the land or existing structures authorized by such conditional use permit approval has occurred within twelve (12) months from the approval date of said conditional use permit.

    b. Where circumstances beyond the control of the applicant cause delays which do not permit compliance within the time limitation established in this section, the City Planner may grant an extension of time for a period of time not to exceed an additional twelve (12) months. An application for an extension of time must be set forth in writing, stating the reasons for the extension, and must be filed with the Planning Division a minimum of thirty (30) calendar days prior to the expiration of the conditional use permit approval. Such application shall be filed together with the city's processing fee, as established by the City Council.

2. This approval is to permit live entertainment and the establishment of a Type 41 On-Sale Beer and Wine License for a Bona Fide Public Eating Place from the State Department of Alcohol and Beverage Control for an existing restaurant known as "Mountain Mike's".

3. The applicant shall agree to defend, at his sole expense, any action brought against the city, its agents, officers, or employees, because of the issuance of such approval, or in the alternative, to relinquish such approval. The applicant shall reimburse the city, its agents, officers, or employers, for any court costs and attorney's fees which the city, its agents, officers or employees may be required by a court to pay as a result of such action. The city may, at its sole discretion, participate at its own expense in the defense of any such action, but such participation shall not relieve the applicant of his obligations under this condition.

4. Any revisions, modifications to the ABC License, as prepared by the State of California Department of Alcoholic and Beverage Control or any modifications to any conditions listed herein, must be submitted to the Planning Division; additional review and approval may be required by the Planning Commission.

5. All requirements of the Department of Alcohol and Beverage Control shall be complied with and such requirements shall become part of these conditions of approval by reference.

6. "Loitering is Prohibited" signs shall be posted on and around the subject premises. Size and location shall be approved by the property owner and the City of Highland Planning Division.

7. The sale of alcoholic beverages shall be limited to the hours of 11:00 a.m. to 10:00 p.m. Monday through Sunday. Should there be a desire to extend the hours of operation listed above a revision to the Conditional Use Permit will be required.

8. Should at any time, the ABC License issued to the applicant by the State of California be surrendered or abandoned, this Conditional Use Permit shall automatically become null and void.

STAFF REPORT

TO THE PLANNING COMMISSION

DATE: January 4, 2022

FROM: Lawrence A. Mainez, Community Development Director

REVIEWED BY: Kim Stater, Assistant Community Development Director

PREPARED BY: Ash Syed, Associate Planner

SUBJECT: Supplementary review of the Landscape Plan, Mediterra Park amenities, a lockable gate at the 1N16 Trail entrance, and entry statements along Mediterra Parkway related to the approved Design Review Application (DRA 21-007) for 149 single-family homes within Phases 1 & 2 of the Mediterra Planned Development.

LOCATION: North side of Greenspot Road approximately 600 feet east of Santa Paula Street.

Assessor's Parcel Numbers: 0297-021-25, 0297-021-26, 0297-021-27 & 0297-021-28

APPLICANT: D.R. Horton

RECOMMENDATION: Staff recommends the Planning Commission approve revisions to the project as part of the Conditions of Approval for Resolution No. 2021-014

FISCAL IMPACT: The Applicant submitted the required deposit fee for processing Design Review Application (DRA 21-007). Staff time spent working on the application will be charged to this deposit.

PUBLIC NOTICE: As required by City Council Resolution, notice of the public hearing was posted at the City's three designated posting locations. The notice was posted on the City's website, mailed to property owners within 300 feet of the project site and to parties requesting notice. The notice was published in the Highland Community News on December 24, 2021.

Approved _____	Motion _____	Second _____	Agenda Item No. 2
Denied _____	Ayes _____		
	Noes _____		File No. _____
Continue _____	Abstain _____		
	Absent _____		

Recording Secretary

Community Development Director

PREVIOUS ACTION:

Planned Development (PUD 13-001)

In March of 2016, the Highland City Council approved the Mediterra Planned Development (PUD 13-001) via Conditional Use Permit (CUP 14-005), consisting of 316 units within eight (8) Planning Areas on approximately 180 acres.

In August of 2021, the Planning Commission approved Design Review Application (DRA 21-007) for the construction of 149 single-family homes, a public park, a public trail, a private common area, a private community pool, and a recreation center within Phases 1 & 2 of the Mediterra Planned Development. However, the project was conditioned to require a supplementary Planning Commission review of the development's Landscape Plan, Mediterra Park amenities, lockable gate at the 1N16 Trail entrance, and entry statements along Mediterra Parkway prior to the issuance of any building permits.

PROJECT REVIEW/ANALYSIS:

Entry Statements

The original Site Plan for the housing development did not include prominent entry statements at the Portofino Street and Mediterra Parkway entrances that displayed the name of the community (Vista Verde at Mediterra). The Planning Commission directed the Applicant to incorporate notable entry statements embellished with Mediterranean inspired stone and resubmit the revised design for further review prior to first occupancy (Exhibit 1 – Entry Statements).

Onsite Trees

The Project's Conceptual Landscape Plan initially proposed only one (1) tree per residential lot. According to the developments standards established in the Mediterra Planned Development Document, there is a requirement of two (2) trees per interior residential lot and three (3) tree planted on corner lots. While the Applicant explained that the single-tree design was proposed to help make the architectural elements of the home more visible to the public, the Planning Commission refuted the justification and directed the Applicant to revise the Landscape Plan to include two (2) and three (3) trees per interior and corner residential lots, respectively (Exhibit 2 – Onsite Trees).

Access Gate

The original Site Plan did not include any depiction of a gate at the entrance to the 1N16 trail from Capri Way as the Applicant's intent was to seek the Planning Commission's direction on how appropriately secure the trail. The Planning Commission directed the Applicant to work with City Staff to determine the

appropriate location for the gate and provide images of potential designs for further review. The Applicant ultimately decided on two (2) lockable, tubular steel vehicle gates, placed just north of Lot 2 and across Capri Way from Lot 107, to restrict access to emergency vehicles only (Exhibit 3 – Access Gate).

Shade Structure

The original Landscape Plan proposed for the Mediterra Planned Development did not incorporate any sort of shade structures within Mediterra Park. While this was not initially required as part of the list of amenities for the park, the Planning Commission and the City's Landscape Architect justified a requirement for shade structure, stating that high temperatures during the summer months would make this gathering area uncomfortable without one. The Applicant was directed to revise the Mediterra Park design to the include a shade structure return to the Planning Commission for further review (Exhibit 4 – Shade Structure).

ENVIRONMENTAL REVIEW: This development of 149 single-family homes was approved on August 3, 2021, anticipated in the 2016 Initial Study / Mitigated Negative Declaration and 2020 Addendum prepared for the Mediterra Planned Development, and approved by the City of Highland City Council on March 8, 2016 and December 8, 2020. The supplementary review of the Landscape Plan, Mediterra Park amenities, a lockable gate at the 1N16 Trail entrance, and entry statements along Mediterra Parkway was included as a Planning Condition as part of the August 3, 2021 approval of Design Review Application (DRA 21-007). The project shall comply with the Mitigation Monitoring and Reporting Program adopted concurrently with Mitigated Negative Declaration (ENV 15-006). No further action is required.

ANALYSIS: As discussed in previous sections of this report, the Vista Verde at Mediterra housing development is in compliance with the concept envisioned within the Mediterra Planned Development Document. The August 3, 2021 Planning Commission approval included directives and conditions for the Applicant to revise the discussed items for additional review prior to first occupancy. The Applicant has since worked with Staff to ensure each of the Planning Commission's directives and conditions were satisfied by the proposed revisions.

EXHIBITS:

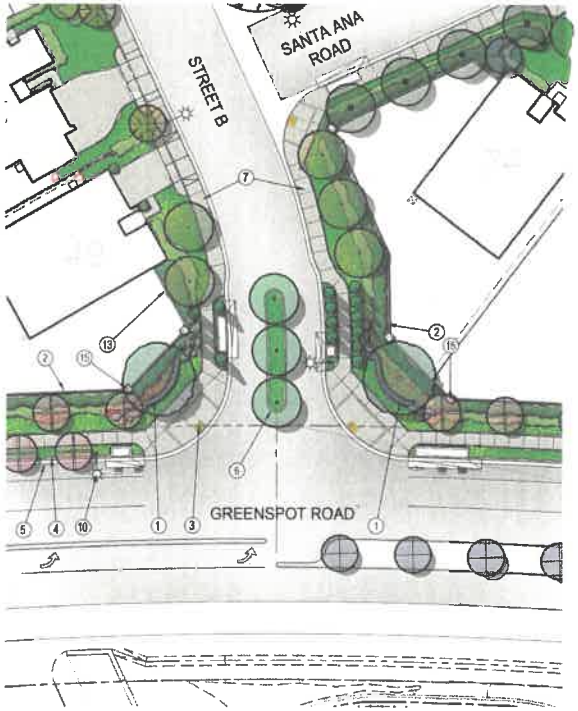
1) Entry Statements
2) Onsite Trees
3) Access Gate
4) Shade Structure

ATTACHMENTS:

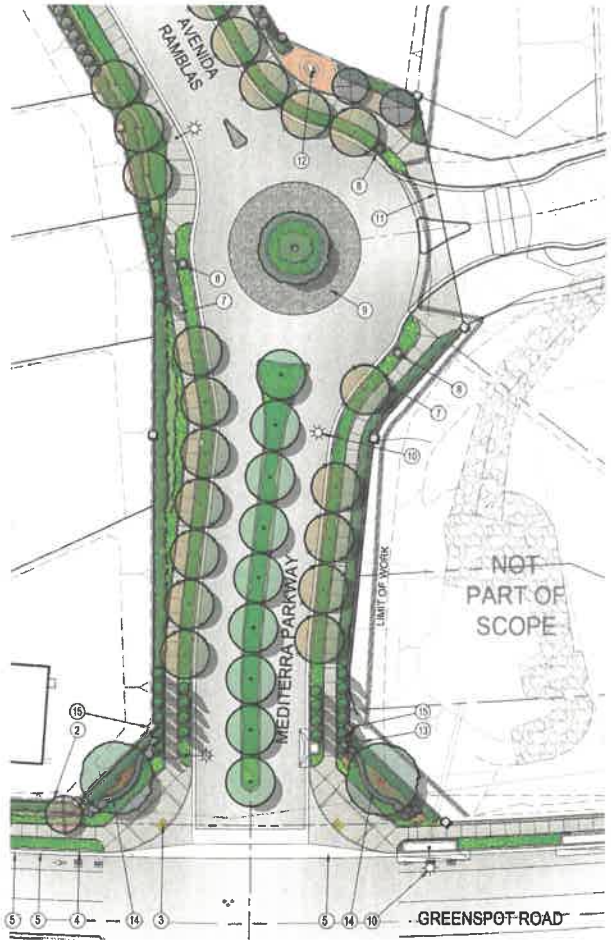
1) Minutes from August 3, 2021 Planning Commission Meeting
2) Planning Commission Resolution No. 2021-014 for Design Review Application (DRA 21-007)

Exhibit 1:

Entry Statements



A - VISTA VERDE AT MEDITERRA ENTRY



B - MEDITERRA ENTRY

PLANT PALETTE:

THEME TREES

MULTI-TRUNK SPECIMEN TREE

Quercus suber	- Cork Oak

EVERGREEN THEME TREES

Arbutus 'Marina'	- Strawberry Tree
Olea e. 'Wilsonii'	- Fruitless Olive

SMALL FLOWERING ACCENT TREE

Legerstroemia i. 'Tuscarora'	- Tuscarora Crape Myrtle
Legerstroemia i. 'Natchez'	- Natchez Crape Myrtle

COLUMNAR TREE

Cupressus sempervirens	- Italian Cypress

SHRUBS AND GROUNDCOVER

BACKGROUND

ACACIA REDOLANS 'DESERT CARPET'	- PROSTRATE ACACIA
ARBUTUS UNEDO 'COMPACTA'	- DWARF STRAWBERRY TREE
BACCHARIS PILULARIS 'TWIN PEAKS'	- COYOTE BRUSH
CALLISTEMON 'LITTLE JOHN'	- DWARF BOTTLEBRUSH
CISTUS SPECIES	- ROCKROSE
DIETES BICOLOR	- FORTNIGHT LILY
ECHIUM FASTUOSUM	- PRIDE OF MADEIRA
FESTUCA O. 'GLAUCA'	- BLUE FESCUE
JUNIPERUS SPECIES	- JUNIPER

MIDGROUND

LAVANDULA SPECIES	- LAVENDER
LAVATERA ASSURGENTIFLORA	- TREE MALLOW
LIGUSTRUM TEXANUM	- WAXLEAF PRIVET
MUHLENBERGIA RIGENS	- DEER GRASS
PYRACANTHA SPECIES	- FIRETHORN
ROMNEYA COULTERI	- MATILIJA POPPY
ROSMARINUS SPECIES	- ROSEMARY
SALVIA SPECIES	- SAGE

FOREGROUND

SESLERIA AUTUMNALIS	- SESLERIA
SISYRINCHIUM BELLUM	- BLUE-EYED GRASS
TRACHELOSPERMUM JASMINOIDES	- STAR JASMINE

KEY MAP



FEATURE LEGEND:

1. "VISTA VERDE AT MEDITERRA" ENTRY MONUMENT WALL AND SIGNAGE.
2. 7' HIGH PRECISION CMU PERIMETER AND PRIVACY WALL WITH DECORATIVE CAPS.
3. ADA CURB RAMP PER CIVIL ENGINEERS PLANS.
4. STREET CURB PER CIVIL ENGINEERS PLANS.
5. STREET GUTTER PER CIVIL ENGINEERS PLANS.
6. PLANTER MEDIAN.
7. SIDEWALK PER CIVIL ENGINEER'S PLANS.
8. 42" TALL STONE PILASTER WITH PROJECT LOGO PLAQUE.
9. ROUNDABOUT PLANTER MEDIAN.
10. STREET LIGHTS PER CIVIL ENGINEER'S PLANS.
11. TEMPORARY 6' HIGH VINYL FENCING.
12. PROPOSED EXERCISE STATION.
13. 6' HIGH PRECISION CMU WALL WITH DECORATIVE CAP. SEE WALL AND FENCE PLAN AND DETAILS, SHEETS L-4 AND L-5.
14. "MEDITERRA" ENTRY MONUMENT WALL AND SIGNAGE WITH LANDSCAPE BERMING BEHIND. SEE ELEVATION, SHEET L-7.
15. 7'-8" CMU PILASTER WITH CAP. SEE WALL AND FENCE PLAN AND DETAIL, SHEETS L-4 AND L-5.

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CONCEPTUAL LANDSCAPE PLAN - ENTRY ENLARGEMENTS

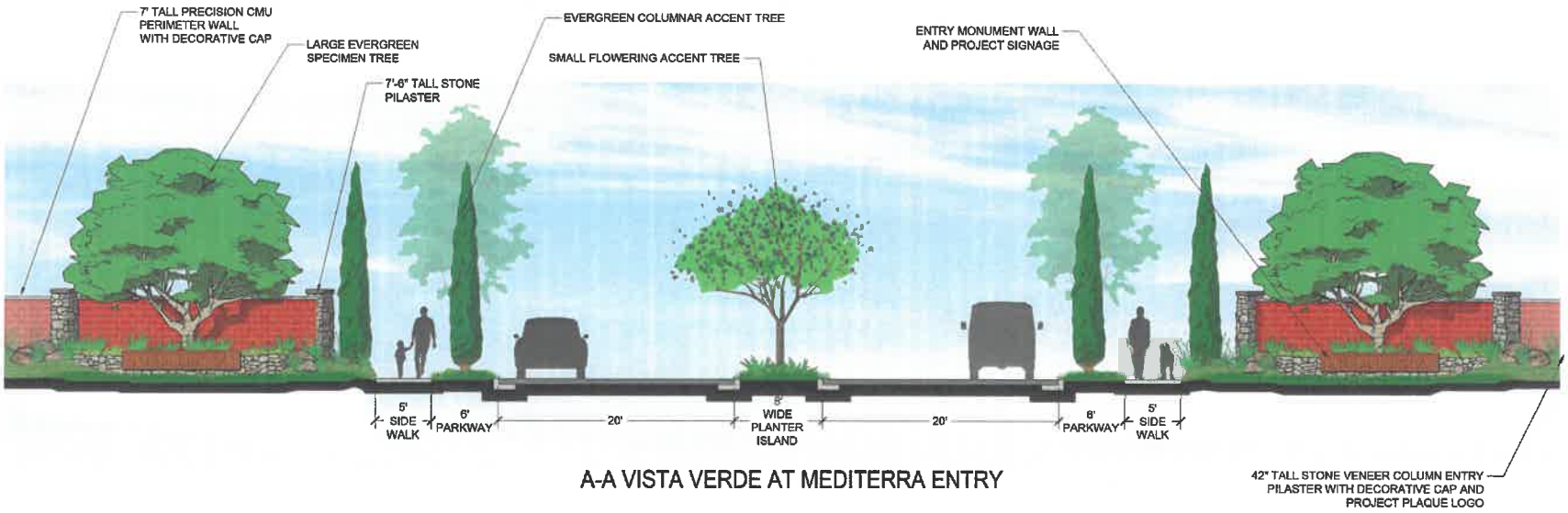
HIGHLAND, CA

0 10' 20' 40' 80'
SCALE: 1" = 20'

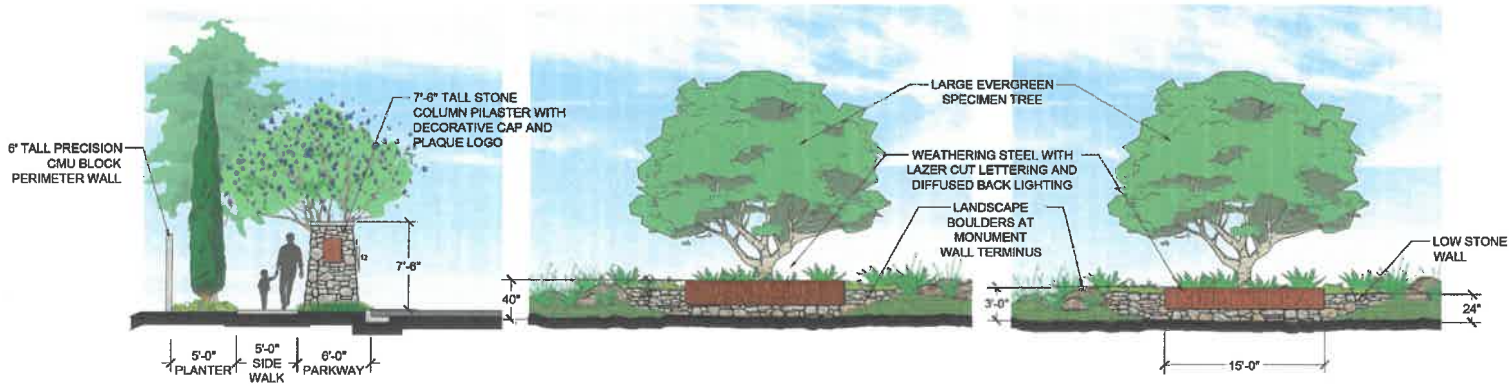
SCALE: 1" = 20'
DATE: OCTOBER 2021
ADG JOB #: 2044

ARCHITERRA DESIGN GROUP

L-6



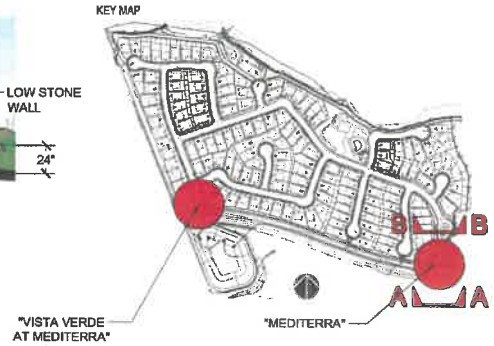
A-A VISTA VERDE AT MEDITERRA ENTRY



B-B NEIGHBORHOOD ENTRY PILASTER

"VISTA VERDE AT MEDITERRA" ENTRY MONUMENT

"MEDITERRA" ENTRY MONUMENT



D·R·HORTON America's Builder CONCEPTUAL LANDSCAPE PLAN - CONCEPTUAL ELEVATIONS
HIGHLAND, CA

SCALE: 1/4" = 1'-0"
DATE: NOVEMBER 2021
ADG JOB #: 2044

ARCHITERRA DESIGN GROUP

L-7

Exhibit 2:

Onsite Trees



FEATURE LEGEND:

1. FIRE ZONE 1 (DEFENSIBLE SPACE)
2. FIRE ZONE 2 (BUFFER)
3. FIRE ZONE 3 (THINNING)
4. ADA CURB RAMP PER CIVIL ENGINEERS PLANS.
5. ASPHALT PAVEMENT ADJACENT DECOMPOSED GRANITE TRAIL.
6. INTERIOR TRACT PEDESTRIAN SIDE WALK.
7. CURB ADJACENT PARKWAY
8. LARGE MEDITERRA PARKWAY ROUND-A-BOUT
9. WQMP BASINS.
10. COMMUNITY RECREATION AREA AND POOL.
11. CURB AND GUTTER PER CIVIL ENGINEERS PLANS.
12. ENTRY MONUMENT.
13. PERIMETER WALL PER WALL AND FENCE PLAN.
14. INTERIOR VINYL FENCE PER WALL AND FENCE PLAN.
15. TUBULAR STEEL VIEW FENCING PER WALL AND FENCE PLAN.
16. 3 RAIL PVC TRAIL FENCING PER WALL AND FENCE PLAN
17. PICNIC AREA WITH DROUGHT TOLERANT LANDSCAPE
18. CHILDREN'S TOT-LOT WITH RUBBER SURFACING
19. PROPOSED EXERCISE STATION.
20. LIGHTING PER CIVIL ENGINEERS PLANS.
21. BIKE RACK
22. ENTRY COLUMN PILASTER WITH SIGNAGE.
23. TRAIL HEAD SIGNAGE FOR OFF ROAD VEHICLE TRAIL.
24. "NO VEHICLE ENTRY SIGN" WITH REMOVEABLE BOLLARDS ON ASPHALT DRIVE. AS APPROVED BY LOCAL FIRE DEPARTMENT, KNOX BOX REQUIRED FOR KEY ACCESS TO BOLLARDS.
25. "NO VEHICLE ENTRY SIGN" AND MAINTENANCE ACCESS POLE GATE. AS APPROVED BY PUBLIC WORKS.
26. EXISTING OFF ROAD VEHICLE TRAIL.

PLANT PALETTE:

THEME TREES

MULTI-TRUNK SPECIMEN TREE - (48" Box)		% OF TOTAL
Quercus suber	• Cork Oak	1 %
EVERGREEN THEME TREES - (48" Box)		
Arbutus 'Marina'	• Strawberry Tree	5 %
Olea e. 'Wilsonii'	• Wilson Fruitless Olive	2 %
INTERIOR STREET TREES - (24" Box)		
Magnolia g. 'Blanchard'	• Magnolia	12 %
Chitalpa Tashkentensis	• Chitalpa	20 %
SMALL FLOWERING ACCENT TREES - (15 Gal)		
Lagerstroemia i. 'Tuscarora'	• Tuscarora Crape Myrtle	25 %
Lagerstroemia i. 'Natchez'	• Natchez Crape Myrtle	11 %
COLUMNAR TREE - (36" Box)		
Cupressus sempervirens	• Italian Cypress	9 %
PARK / PERIMETER TREES - (48" Box)		
Platanus Racemosa	• California Sycamore	3 %
Quercus agrifolia	• Coast Live Oak	1 %
Pinus Pinea	• Italian Stone Pine	1 %
Podocarpus Gracilior	• African Fern Pine	5 %
Eucalyptus Sideroxylon	• Red Ironbark	5 %
	TOTAL	100 %
SLOPE TREE - (15 Gal)		
Quercus agrifolia	• Coast Live Oak	70 %
Cercis c. 'Forest Pansy'	• Western Redbud	30 %
	TOTAL	100 %
TYPICAL FRONT YARD TREES - (15 Gal)		
Callistemon viminalis	• Weeping Bottlebrush	50%
Pistacia chinensis	• Chinese pistache	50%
	TOTAL	100%

SHRUBS AND GROUNDCOVER

HOA MAINTAINED LANDSCAPE AREA

Acacia redolens 'desert carpet'	• Prostrate acacia
Aloe striata	• Coral aloe
Arbutus unedo 'compacta'	• Dwarf strawberry tree
Baccharis pilularis 'twin peaks'	• Coyote brush
Callistemon 'little john'	• Dwarf bottlebrush
Cistus species	• Rockrose
Dietes bicolor	• Fortnight lily
Echium fastuosum	• Pride of madeira
Festuca o. 'glauca'	• Blue fescue
Juniperus species	• Juniper

PRIVATE HOMEOWNER MAINTAINED SLOPES OVER 10'

Lavandula species	• Lavender
Lavatera assurgentiflora	• Tree mallow
Ligustrum texanum	• Waxleaf privet
Muhlenbergia rigens	• Deer grass
Pyracantha species	• Firethorn

PRIVATE HOMEOWNER MAINTAINED SLOPES OVER 3'

Sesleria autumnalis	• Sesleria
Sisyrinchium bellum	• Blue-eyed grass
Trachelospermum jasminoides	• Star jasmine

IRRIGATION NOTES:

ALL HOA MAINTAINED LANDSCAPE AREA SHALL BE INSTALLED WITH AUTOMATIC IRRIGATION SYSTEM THAT MEETS THE CITY'S WATER EFFICIENT LANDSCAPE ORDINANCE, AND APPROPRIATE FOR THE LANDSCAPE HYDROZONES TO PROVIDE 100% COVERAGE.

THE IRRIGATION SYSTEM SHALL INCLUDE A COMBINATION OF LOW VOLUME POP-UP STREAM SPRAY BUBBLERS FOR TREES, AND SUB-SURFACE PRESSURE COMPENSATING DRIPLINES FOR SHRUBS AND GROUND COVER.

IMPROVEMENT NOTE:
GREENPORT ROAD IMPROVEMENTS GO BEYOND FURTHER EAST

0 30' 60' 120' 240'
SCALE: 1" = 60'

SCALE: 1" = 60'
DATE: NOVEMBER 2021
ADG JOB #: 2044

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CONCEPTUAL LANDSCAPE MASTER PLAN

HIGHLAND, CA

ARCHITERRA DESIGN GROUP

L-1

Exhibit 3:

Access Gate



D·R·HORTON America's Builder

CONCEPTUAL WALL AND FENCE PLAN

HIGHLAND, CA

0 30' 60' 120' 240'
SCALE: 1" = 60'

SCALE: 1" = 60'
DATE: NOVEMBER 2021
ADG JOB #: 2044

ARCHITERRA DESIGN GROUP

L-4



Exhibit 4:

Shade Structure



PLANT PALETTE:

THEME TREES

INTERIOR STREET TREES - (24" Box)

Magnolia grandiflora 'Blanchard'	Magnolia
Chitalpa Tashkentensis	Chitalpa

SMALL FLOWERING ACCENT TREE - (15 Gal)

Legerstroemia i. 'Tuscarora'	Tuscarora Crape Myrtle

SLOPE TREE - (15 Gal)

Quercus agrifolia	Coast Live Oak
Cercis c. 'Forest Pansy'	Western Redbud

PARK TREE - (48" Box)

Platanus Racemosa	California Sycamore
Quercus agrifolia	Coast Live Oak
Pinus Canariensis	Canary Island Pine
Podocarpus Gracilior	African Fern Pine

SHRUBS AND GROUNDCOVER

BACKGROUND

ACACIA REDOLANS 'DESERT CARPET'	PROSTRATE ACACIA
ARBUTUS UNEDO 'COMPACTA'	DWARF STRAWBERRY TREE
BACCHARIS PILULARIS 'TWIN PEAKS'	COYOTE BRUSH
CALLISTEMON 'LITTLE JOHN'	DWARF BOTTLEBRUSH
CISTUS SPECIES	ROCKROSE
DIETES BICOLOR	FORTNIGHT LILY
ECHIUM FASTUOSUM	PRIDE OF MADEIRA
FESTUCA O. 'GLAUCA'	BLUE FESCUE
JUNIPERUS SPECIES	JUNIPER

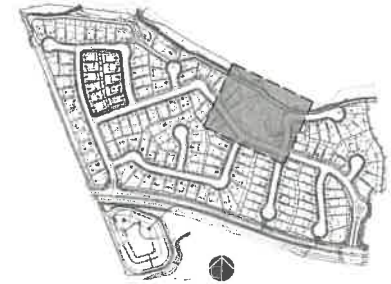
MIDGROUND

LAVANDULA SPECIES	LAVENDER
LAVATERA ASSURGENTIFLORA	TREE MALLOW
LIGUSTRUM TEXANUM	WAXLEAF PRIVET
MUHLENBERGIA RIGENS	DEER GRASS
PYRACANTHA SPECIES	FIRETHORN
ROMNEYA COULTERI	MATILIJA POPPY
ROSMARINUS SPECIES	ROSEMARY
SALVIA SPECIES	SAGE

FOREGROUND

SESLERIA AUTUMNALIS	SESLERIA
SISYRINCHIUM BELLUM	BLUE-EYED GRASS
TRACHELOSPERMUM JASMINOIDES	STAR JASMINE

KEY MAP



FEATURE LEGEND:

1. CONCRETE STAIRS WITH CHEEK WALLS AND HANDRAILS.
2. RESTROOM BUILDING AT POOL.
3. POOL EQUIPMENT AREA.
4. ADA CURB RAMP PER CIVIL ENGINEERS PLANS.
5. ASPHALT PAVEMENT ADJACENT DECOMPOSED GRANITE TRAIL.
6. PEDESTRIAN WALKING / JOGGING PATH.
7. CURB ADJACENT PARKWAY
8. PROPOSED EXERCISE STATION.
8. PRIVATE HOA COMMUNITY RECREATION CENTER WITH COMMUNITY SWIMMING POOL, SUN DECK, SHADE STRUCTURE AND OUTDOOR PATIO FURNITURE.
10. CURB AND GUTTER PER CIVIL ENGINEERS PLANS.
11. BENCH SETTING
12. PERIMETER WALL PER WALL AND FENCE PLAN.
13. INTERIOR VINYL FENCE PER WALL AND FENCE PLAN.
14. TUBULAR STEEL VIEW FENCE AT MID-SLOPE TO ALLOW OPEN VIEW FROM SWIMMING POOL DECK . PER WALL AND FENCE PLAN.
15. 3 RAIL PVC TRAIL FENCING PER WALL AND FENCE PLAN.
16. PICNIC TABLE SEATING.
17. PLAYGROUND WITH RUBBER SURFACING.
18. WOOD OVERHEAD STRUCTURE.
19. CONCRETE HEADER.
20. CMU RETAINING WALL.
21. RAISED PLANTER
22. BIKE RACK
23. TRASH RECEPTACLE.
24. LANDSCAPE SWALE WITH BOULDERS AND LARGE STONES.
25. LOW RETAINING GARDEN / SEATWALL.
26. LIGHTING BY ELECTRICAL LIGHTING ENGINEER.
27. CHARCOAL BARBEQUE GRILL AND HOT COAL RECEPTACLE.
28. LANDSCAPE BOULDERS.
29. OPEN LAWN FOR INFORMAL PLAY.
30. "NO VEHICLE ENTRY SIGN" AND MAINTENANCE ACCESS POLE GATE.

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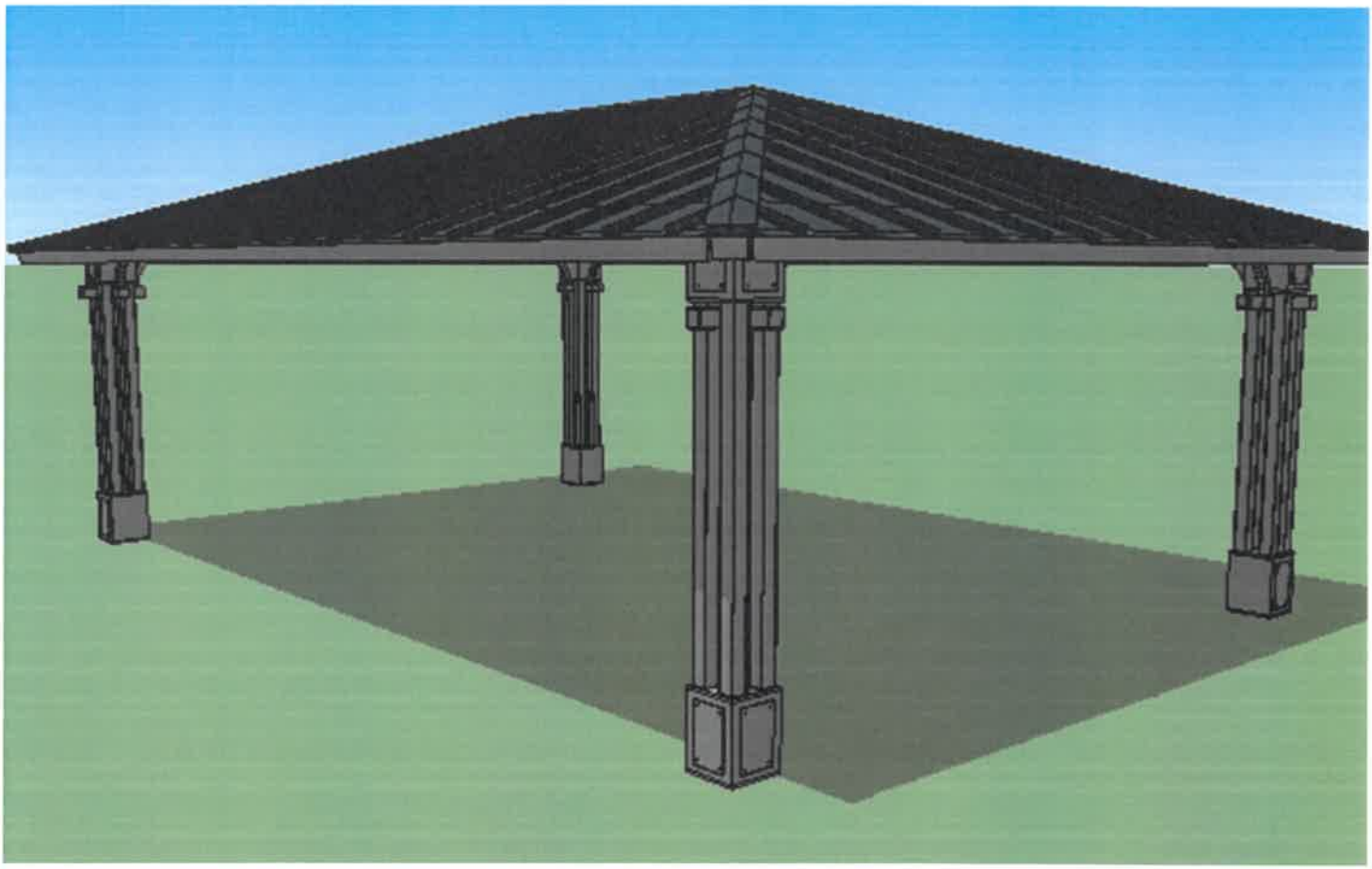
PARK ENLARGEMENT PLAN
HIGHLAND, CA

0 10' 20' 40' 80'
SCALE: 1" = 20'

SCALE: 1" = 20'
DATE: NOVEMBER 2021
ADG JOB #: 2044

ARCHITERRA DESIGN GROUP

L-3





Attachment 1:

Minutes from August 3, 2021

Planning Commission Meeting

Community Development Director Mainez stated we get that a lot when there is number of different detached structures on a commercial or industrial property. Edison wanted a separate address there.

Vice Chair Thomas asked what is your plan for the outdoor portion of the site? Were you planning on just having the business indoors?

Applicants' wife stated not outside.

A MOTION was made by Chair Hamerly, seconded by Vice Chair Thomas that the Planning Commission finds in favor of the applicant. That the proposed use would not be an increase in intensity of use and would be an appropriate use for this legal nonconforming site. This item will come back with the findings, and be continued to our next Planning Commission meeting, August 17, 2021. Motion carried, 5-0.

PUBLIC HEARING

3. A Public Hearing to Consider the Appeal of Administrative Citation No. 15051 issued for the discharge of fireworks in violation of Chapter 8.58 of Title 8, of the Highland Municipal Code, at the property located at 7453 Victoria Avenue, Highland, California. Cited: Miguel Abendano (APP-21-002)

Chair Hamerly opened the public hearing.

Community Development Director Mainez presented the staff report.

Chair Hamerly closed the public hearing.

A MOTION was made by Commissioner Amaya, seconded by Commissioner Sutorus, to uphold Administrative Citation No. 15051 and adopt Appeal Board Resolution No. 2021-013. Motion carried, 5-0.

RESOLUTION 2021-013

A RESOLUTION OF THE PLANNING COMMISSION/APPEALS BOARD OF THE CITY OF HIGHLAND, CALIFORNIA, DECLARING THAT A VIOLATION OF HMC 8.58.020(A) OCCURRED ON THE PROPERTY LOCATED AT 7453 VICTORIA AVE, HIGHLAND, CALIFORNIA, ON JUNE 8, 2021, THEREBY UPHOLDING ADMINISTRATIVE CITATION NO. 15051 AND ORDERING THE APPELLANT TO PAY THE CITATION FEE IN ACCORDANCE WITH HMC 8.58.060(B).

4. Design Review Application (DRA 21-007) for the analysis of a site plan, building elevations, rough grading plan, conceptual landscape plan, and model home complex regarding the construction of a 149 single-family home community, a public park, public trails, a private common area, a private community pool, and recreation center within Phases 1 & 2 of the Mediterra Planned Development. (APN Nos: 0297-021-25, 0297-021-26, 0297-021-27 & 0297-021-28)

Commissioner Miller abstained from item No. 4 based on a conflict.

Associate Planner Syed presented the staff report.

Chair Hamerly opened the public hearing.

Commissioner Sutorus asked did staff provide an example of what type of shade structure the city wanted approved?

Associate Planner Syed stated it could either be a solid one or lattice.

Chair Hamerly stated since there is pretty extensive trelliswork or shade structure within the pool area that fronts immediately to the lawn. Why wouldn't staff suggest that a tree would soften that a little bit?

Associate Planner Syed stated a tree could provide shade. Since this is a new development by the time those trees have grown and can provide shade it will be years before that will happen. For the initial stages of the project, it will be very difficult for residents to use those common areas and those picnic tables in the heat without immediate shade.

Assistant Community Development Director Stater stated the features provided currently in our parks and for gathering with our climate really seemed to be an amenity that is appreciated by the park patrons currently.

Chair Hamerly stated I agree, it is like a sundial. I was suggesting trees for the picnic area because the same holds true for play areas, so the kids don't overheat. I did not see a shade structure plan for the play area. If we are going to swap one for the other, protect the kids where the activity is the highest and put it over the play area and then leave the natural amenities over the picnic area. You can put in a 48-inch tree there and that is going to grow quickly.

Commissioner Amaya asked is the street Paseo Ramblas perpendicular to Avenida Ramblas?

Associate Planner Syed stated Paseo Ramblas runs along Avenida Ramblas. It's on one side of the street, it is like a parkway.

Chair Hamerly asked is the infrastructure going for the streetscape specifically the paved areas, curb, gutter, and sidewalks? Are they anticipating that it is going to go in at one time for both phase and 1 and 2 concurrently?

Associate Planner Syed stated no, phase 1 and 2 will be developed concurrently.

Chair Hamerly asked will they have access to the main street coming in the Mediterra Parkway?

Associate Planner Syed stated yes.

Chair Hamerly stated the streetscape that was shown in section C was the park adjacent section of Avenida Ramblas, that portion of the parkway had a double parkway on both sides of the street. If you look at the streetscape section in Exhibit 9-10 that was the

original intent because that is the core of the entire development. I noticed they went back to the single line of trees with the curb adjacent sidewalk right by the park.

Associate Planner Syed asked is this by Santana?

Chair Hamerly stated yes, and that one section right through there was originally supposed to be a double parkway. There were going to be multiple crossing points. I would encourage them to go back to that plan and that exhibit cross section C in the specific plan document.

Chair Hamerly asked why the landscape theme for the Greenspot Road streetscape was not extended to that side of the property?

Assistant Public Works Director Bennett stated it is to blend in with the natural landscape. As far as the water quality basin as described was a tubular steel fencing around it, so that it doesn't appear to be a basin is then attempting to come back as a natural landscaping.

Chair Hamerly stated the landscape features that are around the perimeter of the basin I was envisioning rather just have a bare metal fence there. At least we have some vines or some plants that replicate some of the landscaping that's present in East Valley Water District, streetscape landscaping. It is highly visible and at three plus acres it is going to be very visible on the inside of that corner, so you will see down into the basin. We do not want it to look like just a bunch of dead weeds out there that are in the wash right now.

Assistant Public Works Director Bennett stated ok, just to point out as you mentioned there is not any current plans for a sidewalk on the southerly side west of Water Conservation District land that will be maintained natural.

Chair Hamerly asked is that west or east?

Assistant Public Works Director Bennett stated west.

Chair Hamerly ok, so this is conservation land. Where does the East Valley Water District land stop?

Assistant Public Works Director Bennett stated the East Valley Water District property is probably 400 feet east of this eastern boundary of the basin. There is still an underlying property that could be developed in some other fashion.

City Landscape Architect Scott Rice stated we can work with the applicant and their landscape architect to develop a palette that would be complementary to the northside, but also considers the natural plantings. On the southside you are really touching that environmentally sensitive area and there are species that would work well.

Chair Hamerly stated I was mainly interested in the drive by presentation of that area because that is a prominent curve right there. If we could introduce street trees at a reasonable spacing and at least some perimeter to mask off the wrought iron fence so we do not have a 6-foot-tall barrier.

City Landscape Architect Scott Rice stated I would recommend using the landscape frontage for East Valley Water District facility as an inspiration for the look as opposed to just mimicking the northside of the street.

Chair Hamerly stated the south edge of Greenspot Road would keep that corridor consistent.

Chair Hamerly stated regarding the big plot plan, I think the main issue that staff brought up in their report sounds like it has been addressed with breaking up the six consecutive two-story units with the single story which should soften that. I think that is especially important because that is the longest stretch of lots that front directly to Greenspot Road.

Commissioner Amaya asked are those the model homes?

Chair Hamerly stated the western 3 are the model homes. On the original site plan there was a roundabout shown coming in off the main parkway, but there was another that was directly adjacent to the park to have everyone to slow down.

Assistant Public Works Director Bennett stated the design feature that has been provided at that intersection are the bulb-outs. That intersection was going to see additional pedestrian traffic and the intent of these bulb-outs was to allow the pedestrians to have a position at the intersection visible shorter crossing. The only roundabout that remains is the first one coming in through the track off Avenida Ramblas in Mediterra Parkway.

Chair Hamerly asked do you think that is as effective as traffic calming as a roundabout that is an actual diversion?

Assistant Public Works Director Bennett stated it is probably not as effective, it is a location, and the footprint is smaller. Regarding the park the traffic is still dominant on Avenida Ramblas, but the roundabout is not always the easiest for pedestrians as well.

Chair Hamerly stated we are taking away from some of the aesthetic benefits in the core of the project. If I had to pick and choose between which one would be more attractive or appealing right around the park, I think would take the parkway over the roundabout. Something needs to be done because that is the core of the project.

Assistant Community Development Director Stater stated this was a concession that was made with the redesign when we established Street B as a main entrance and moved that Mediterra Parkway over.

Chair Hamerly stated it makes sense with the realignment of the main entry, but that is still the core of the project, regardless of where the main point of entry is. The park is the core of the project and to take two major aesthetic hits, we're taking out the roundabout and you are narrowing the parkway.

Chair Hamerly stated in the Conditions of Approval there are several issues that are addressed. The most significant ones are the entry statements that are not detailed in landscape exhibits. Those are mentioned as being approved by Community Development Director. There is one of two ways we can go on, that we can either use

the exhibits that are in the specific plan and use those as the guiding documents. Given the discussions that we have already had, I'm a little nervous to make that concession. The Mediterra Parkway and Street B, those main entry statements at a minimum, and those two points should have been included in the landscape exhibits because those are the statement features of the entire development. I would like to propose that we change those Conditions of Approval numbers 17 and 19 on page 37 of the staff report. I do concur with item 18. The configuration of the pool notice that it did a mirror image and it got substantially smaller. If that is the only pool in the community and it has high traffic, I think a pool deck would be better. It does not look like the area is immediately adjacent just to the south and west of that shade structure is in a lawn area or a highly used area for play. Why is the pool area reduced in size for what looks to be shrubs and ground cover? I do not mind the orientation of the pool, but I encourage them to explore the additional shade structure and expanding the pool deck area, so we have a bit more circulation space.

Alyssa Bottinelli, Applicant stated yes, what we are presenting here is in line with the specific plan, but it is still in concept. As we work through our construction documents, we will wholeheartedly consider all considerations and as we work those again those construction documents will have more of the final design.

Chair Hamerly stated given the types of vehicles that frequently parked on Street L you see a lot of offloading of off-road vehicles, so you have trailers and trucks, and that street does not look like it has much capacity for community parking. Is there any thought to expanding that fire buffer zone to include dirt area to park off the street for larger vehicles like towing trailers?

Assistant Community Development Director Stater stated we would have to look at the grade at that location.

Chair Hamerly stated that street would not accommodate because since it is a street that is going to be accessing all those homes that are right there. You put a couple of trucks with trailers, and it is going to get congested in a hurry right there.

Assistant Community Development Director Stater stated I know we talked to Camille Barhi about that in the early development stages. The resolution was on street parking at street L, and it will have access to the trail itself. I do not see people parking too much further up. Perhaps when we bring back condition 17 and 19 for Planning Commission approval, we can look at an alternative parking area.

Chair Hamerly stated yes it needs to be a real trailhead with substantial parking, not just kind of parallel parking on the street.

Assistant Community Development Director Stater stated that was some of the considerations in our conversations with the applicant about amenities at the park and they were very conscientious and added certain things that we had asked for. They are going need some shade, water, and places to park so we are trying to accommodate that within this narrow portion of the of the development.

Chair Hamerly stated it also mentions on note 5 that the beginning of that trail is going to be asphalt. How far up is the asphalt going?

Assistant Community Development Director Stater stated the natural hillside trail.

City Landscape Architect Scott Rice stated considering the park exhibit part of the landscape pertaining to the shade this is an interesting site because the pool area is key fob residents only, but the remainder of the park side is public. The shade within the pool area would not necessarily serve the park. I think that is one of the things that was driving the comment relating to shade for the park site. We had some discussion about the playground area itself, it has a large footprint. Overtime the amount of surfacing that is in the park site has a maintenance cost and replacement costs that if the surfacing is not really serving any play function it is just out there. We did not explore shade over the playground at this level.

Chair Hamerly stated some of those place structures are self-shading. I think it is important that there be some element of shade within the play area.

City Landscape Architect Scott Rice stated there would be some flexibility in the footprint of the play area if that would offset the costs of the shape.

Community Development Director Mainez stated there is a lot of comments and I suggest refining it for the comments and bring it back with the other and suggested conditions later.

Commissioner Sutorus stated I enjoyed your plan model that has the kind of mother/grandmother suite, that is very needed in our community.

Alyssa Bottinelli stated thank you for that. We do the multigenerational (multi-gen) plans and we have two of them at this community. We been building them throughout Southern California. They have done very well, and they really speak to the contemporary family living needs in America today. We are very excited to bring our multi-gen plans to the City of Highland.

Chair Hamerly stated regarding the shutter configurations, the shutters on the non front elevations are listed where they are visible note that it is typically only one window that has the shutters. Even though there are typically two cases in point would be planned 1A Santa Barbara, and that is drawing exhibit 1.4 in the packet. On the left elevation, the middle window has the two shutters, the one that is closest to the front does not have any. If they are going to be visible from the middle, that they would also be visible on the one that is closest to the entry. I would recommend adding another set of shutters that are closest to the front. In terms of the Santa Barbara style, I was wondering if there was some rationale for when it was decided to use the tile accent and where it was eliminated? It seems like everywhere that there is a single round top arch that had the tile accent would work in all of them. The one for plan 1A has three arches, so I think it'd be a bit overdone for that one. I would agree with your decision to eliminate the tile, but on some of the other ones where you only had a single arch, what was the rationale for not having tile for those arches?

Gary Cunningham Senior Architect for Applicant stated the front window on the left elevation is going to be the same between all. If you see the shutters to the center window, we placed it there because it is in the center wall plane. If you look to the right if I try to introduce the second window and with the return fence there is an opportunity of crowding it.

Dan Dugan Architect for the Applicant stated regarding the tiles our opinion was the same, but it would have a little too tight with that and, we do not want it to be redundant. We wanted to mix it up a little bit with the Santa Barbara style, so we get a good mixture of arches and front elevations that have the tiles and some that did not.

Chair Hamerly asked did it have more to do with color palette than it did with the specific style or the particular model?

Dan Dugan stated no, it is just a redundancy.

Chair Hamerly stated assuming there within the overall plotting plan that there would not be, let's just say three Santa Barbara styles in a row that they would be mixed up with the Italian in the Tuscan. How much risk do you think there would be if all the two-story plans that were Santa Barbara style had the tile accent just around the entry feature?

Gary Cunningham stated we can look at it with our colors that helps us go through with the color palettes and they also do the color elevation assignments per lot, per house and color plotting so it is something we can look.

Chair Hamerly stated in terms of the locations of the shutters there isn't trim around the arch so if that were the plainer Santa Barbara style you would expect that the window above that would have some sort of attention. Either that being shutters, wrought iron or planters. The shutters are at the larger window to the left, but that element looks a little bland for the main entry right in the heart of the elevation, so I was wondering if there's another layer of detail that is consistent?

Gary Cunningham stated the main element over the entry arch is a deep and recess. It gives a tower effect, so as you enter the arch entry that is your point of entry, and you have the tower element over the top of the shadow line. To the left or the shutters if I was to introduce another pair of shutters as you as an architect proportion of shutters are very important. European shutters usually are a single shutter and it's the size of the windows. If we try to apply it on a deep recess architecturally that is not typically acceptable and designing too narrow over shutter is usually how shutters are applied. We looked at where the shutters would work proportionately to the window and that's on the left side second floor. Can we look at some other additional material, absolutely?

Chair Hamerly stated within the Santa Barbara style there are a couple of options for articulating a main entry. You have used the tile surround on the archway. Another would be using reveals where you are taking the plaster and you are stepping it back, whether it is a chamfer, a step, or series of steps. It seems like that might be a middle ground because it is kind of an all or nothing solution. For the arches that have no detail and it is just a simple roman arch, would that be an option to add a layer of detail that might complement your recessed window up above?

Gary Cunningham stated at the lower here is a wainscot material apply. There is a layer effect across the bottom, so that's about an inch and a half going across. We do not paint it a different color. We refer to that as candy striping. We want a color of the same material, and you will see it labeled in a black and white text. If you are asking for

another layer, a vertical layer that would be breaking this gable and coming down. That applying additional layer.

Chair Hamerly stated a simpler effect where you are chamfering the arch, might allow that dramatic window treatment to carry the day around the entry.

Gary Cunningham stated to accommodate your request as well as work within my client's budget I can reallocate this arch material to another plan and allow this to take over.

Chair Hamerly stated it is an option because one other feature that is on this one that I really find attractive is the decorative wall on the buttress. It is a nice detail, and you see a lot of that in the Santa Barbara style. I know lot more expensive to do, but anywhere we can introduce things like that around the entry, I think that almost reads more dramatically than tile a lot of times.

Gary Cunningham stated usually the buttress works well here versus trying to throw it here where it's impeding a garage driveway right.

Chair Hamerly stated yes, might have a trouble backing out of the garage that would not be workable.

Commissioner Sutorus asked are you going to have solar on their roofs?

Gary Cunningham stated in today's environment with building green solar is here to stay and there will be solar installed standard just to comply with California Energy Code. The problem is as a design professional I have the building code over here and at the state government it says you shall do this, but this specific plan was developed 10 years ago. Solar came into play about 12 years ago and we got around it because of the tentative tract maps however, we try to locate solar, so they are not on the front of the elevations.

Vice Chair Thomas asked how was the red brick wall chosen?

Alyssa Bottinelli asked are you referring to the ladera brick perimeter wall?

Vice Chair Thomas stated yes.

Alyssa Bottinelli stated it is a block wall, so it is not brick. The ladera red is more of a Mediterranean feel it is a bit of a higher end block wall, and it should add a little bit more of a higher end feel to the community.

Richard Krumwiede Landscape Architect for the project stated the ladera red wall is based on inspiration from Camille Barhi, the original owner. We have been with this project for almost 8 years through Camille. We want to stick with a Mediterranean theme with all the landscaping.

Chair Hamerly asked would that impact the color selection of some of the plant materials that are in the parkway to compliment the deeper jewel tone as opposed to get the contrast?

Richard Krumwiede stated I would say that the red is more like the roof tile red on the homes. They have a bit of a patina to it than a brilliant red. It is a called a Tuscan Red. Chair Hamerly closed public hearing.

Assistant Community Development Director Stater and Associate Planner Syed recommended modifications of the Conditions of Approval Numbers 17, 19, 21 and 22.

A MOTION was made by Commissioner Amaya, seconded by Commissioner Sutorus, to adopt Resolution No. 2021 – 014 to:

1) Make a finding under Public Resources Code Section 21166 and the corresponding CEQA Guidelines Section 15162 that there are no substantial changes or new information of substantial importance that would trigger the preparation of subsequent environmental documents and further find that the project is exempt from additional environmental review under Government Code Section 65457; and

2) Approve Design Review Application (DRA 21-007), subject to the Conditions of Approval as modified numbers 17, 19, 21, and 22 and Findings of Fact. Motion carried 4-0-1.

RESOLUTION NO. 2021-014

A RESOLUTION OF PLANNING COMMISSION TO APPROVE DESIGN REVIEW APPLICATION (DRA 21-007) FOR THE CONSTRUCTION OF 149 SINGLE-FAMILY HOMES, A PUBLIC PARK, A PUBLIC TRAIL, A PRIVATE COMMON AREA, A PRIVATE COMMUNITY POOL, AND A RECREATION CENTER WITHIN PHASES 1 & 2 OF THE MEDITERRA PLANNED DEVELOPMENT (APN NO. 0297-021-25, 0297-021-26, 0297-021-27 & 0297-021-28).

ANNOUNCEMENTS

The next Planning Commission meeting is scheduled August 17, 2021.

ADJOURN

There being no further business, Chair Hamerly declared the meeting adjourned at 8:35 p.m.

Submitted by:

Camille Goritz, Administrative Assistant III
Community Development Department

Approved by:

Randall Hamerly, Chair
Planning Commission

Attachment 2:

Planning Commission Resolution

No. 2021-014 for

Design Review Application (DRA 21-007)

RESOLUTION NO. 2021-014

A RESOLUTION OF PLANNING COMMISSION TO APPROVE DESIGN REVIEW APPLICATION (DRA 21-007) FOR THE CONSTRUCTION OF 149 SINGLE-FAMILY HOMES, A PUBLIC PARK, A PUBLIC TRAIL, A PRIVATE COMMON AREA, A PRIVATE COMMUNITY POOL, AND A RECREATION CENTER WITHIN PHASES 1 & 2 OF THE MEDITERRA PLANNED DEVELOPMENT (APN NO. 0297-021-25, 0297-021-26, 0297-021-27 & 0297-021-28).

APPLICANT: D.R. HORTON

A. RECITALS

1. On March 31, 2021, the Applicant submitted a Design Review Application (DRA 21-007) for the construction of 149 single-family homes, a public park, a public trail, a private common area, a private community pool, and a recreation center within Phases 1 & 2 of the Mediterra Planned Development.

2. On August 3, 2021, the Planning Commission of the City of Highland conducted a public hearing on the subject Application and concluded the hearing on that date.

3. All legal prerequisites to the adoption of this Resolution have occurred.

4. This development of 149 single-family homes was anticipated the 2016 Initial Study / Mitigated Negative Declaration and 2020 Addendum prepared for the Mediterra Planned Development and certified by the City of Highland City Council on March 8, 2016 & December 8, 2020. The project shall thus comply with the Mitigation Monitoring and Reporting Program adopted concurrently with Mitigated Negative Declaration (ENV 15-006). No further action is required.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

2. The City of Highland Planning Commission, after due consideration, inspection, investigation and study made by itself and on its behalf, and after due consideration of all evidence and reports offered at said hearing, including the staff report to the Planning Commission dated August 3, 2021, and which is incorporated herein by this reference, does find and determine the following facts:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

3. Findings of Fact for DRA 21-007:

a. That the proposed project is consistent with the general plan or specific plan.

Response: The proposal includes components of a Design Review Application; a Site Plan, a Landscape Plan, and Building Elevations. The project is located within the Mediterra Planned Development which specifies lot coverage limits, minimum widths, and lengths. The Design Review Application submittal proposes a housing community that satisfies the size and design guidelines outlined in the Mediterra Planned Development Document. There is also appropriate street frontage, setbacks from the right-of-way line for the adjacent roadway, parking for the proposed development.

b. That the proposed use is in accordance with the objectives of this title, and the purposes of the land use district in which the site is located;

Response: The proposed project will provide 149 future residential dwellings. This type of development is what was originally envisioned for the community and is consistent with the uses and densities proposed by the Mediterra Planned Development. It also complies with the Planned Development land use designation, per the Highland Municipal Code, that permits any density that is compatible with surrounding existing and planned uses as determined through the development review process. Then Mediterra Planned Development Document, which was first approved in March of 2016, established development standards for lot sizes, lot coverage, and land uses for the future development of 3016 homes on this 182.2 acre site. This proposal by the applicant for the development of Phases 1 and 2, the first 149 homes, satisfies these established requirements. Additionally, this housing development is an appropriate proposal as there is an adjacent existing housing community directly to the west of the site.

c. That the proposed use is in compliance with city design and landscape standards and criteria; and

Response: The proposed development complements both the natural surroundings and already developed adjacent communities. With Italianate, Santa Barbara, and Tuscan influenced architecture that embraces the Mediterranean appeal, this development complies with the design aspirations discussed in the Mediterra Planned Development Document. Additionally, the proposed landscaping within the development consists of a variety of trees such as Cork Oak trees by the Greenspot Road entrances,

Tuscarora Crape Myrle and Magnolia trees along Avenida Ramblas, and California Sycamore, Cost Live Oak, Stone Pine, and African Fern Pine trees planted throughout the Mediterra Parks as described in Chapter 9 of the Planned Development Document.

d. That the proposed use, together with the conditions applicable thereto, will not be detrimental to the public health, safety, or welfare or will not be materially injurious to properties or improvements in the vicinity of the site.

Response: The proposed project has been reviewed by Planning, Engineering, Building and Safety, the Fire Department and the Police Department. With the adoption of a Mitigation Monitoring and Reporting Program, along with the implementation of certain conditions of approval necessary to safeguard and protect the public health, safety, and welfare of the general vicinity, the approval of this Design Review Application for the proposed project is warranted.

C. ADOPTION OF RESOLUTION.

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

PASSED, APPROVED and **ADOPTED** this 3rd day of August, 2021.

ATTEST:

Randall Hamerly, Chairman
Planning Commission

Lawrence A. Mainez
Community Development Director

City of Highland, **FIRE PREVENTION DIVISION,** Conditions of Approval.

DATE : August 3, 2021

APPLICANT : DR Horton

ADDRESS : Greenspot Road & Santa Ana Canyon

SITE LOCATION: Phases 1 & 2 of Mediterra Planned Developement

FILE / INDEX No.: DRA 21-007

A tiered level of mitigation options has been developed and listed below are the systems and/or modifications required for your project. Compliance of the following items are a condition of **FINAL OCCUPANCY APPROVAL**. These conditions are required as acceptable solutions to the adverse fire conditions impacting firefighting and emergency operations accompanying the site/area. They will either assist in detection and extinguishment of the fire and/or facilitate the anticipated emergency operations.

This project is protected by the City of Highland Fire Department / Cal-Fire / California Department of Forestry and Fire Protection. Prior to any construction occurring on any parcel, the applicant shall contact the city of highland fire marshal office for verification of current fire protection development requirements. All new construction shall comply with the currently adopted California Fire Code and all applicable statutes, appendices, codes, ordinances, standards and policies of the City of Highland Fire Department/ Fire Prevention Division / Cal-Fire / California Department of Forestry and Fire Protection.

Fire Department Review of all projects is required.

ALL CONSTRUCTION (New and renovations to existing) SHALL COMPLY WITH THE CALIFORNIA FIRE CODE Along with amendments as adopted within the Highland Municipal Code (Ord. #411).

Note: All weather access roads (CFC) and fire hydrant/water system installations shall be in place, inspected and approved, **PRIOR** to combustible material being brought on site.

Note: The City of Highland has 2 areas within the '**FIRE SAFETY OVERLAY DISTRICT**' designated as **FR-1** and **FR-2**. Both areas may border or overlap areas identified by the State/CalFire as '**High Fire Severity Zone**' or '**Very High Fire Severity Zone**'. See **HMC** for construction requirements.

GENERAL.

1. **HF1:** This project is in **fire safety review area 1**. This is a **'very high fire hazard'** area. The project shall comply with the construction and development standards for a **FR-1 area**. Contact the city building & safety division for construction and development standards. A minimum 30' clearance is required around any structure(s). **CFC / CBC**

2. **HF3:** A fuel break of one hundred (100) feet (brush and weed clearance) is required prior to construction. The clearance shall be maintained on a year-round basis. **CFC & HMC**

3. **HF4:** An additional fuel modification zone of 100 feet shall be provided on all side(s) of the proposed lot(s). Fuels in this zone are to be thinned and/or removed or otherwise modified to provide a reasonable level of fire defense protection to the proposed structure(s). **CFC & HMC**

4. **HF5:** A greenbelt or fuel modification zone plan is required for this project. Fuel modification plan requirements shall be site specific to this project. The applicant shall submit a fuel modification plan to the fire prevention department for review and comments or approval. Maintenance of the fuel modification zone, located in designated open space, and enforcement of the fuel modification zone, within the property of individual property owners, shall be the responsibility of a homeowners' association or other approved maintenance authority. **CFC / CBC / HMC**

5. **HF6:** Prior to delivery of combustible building materials, the entire fuel modification zone, as approved by the fire department shall be completed. Any phased implementation of the fuel modification zone shall be done only with **prior** approval of the fire department. **CFC / CBC / HMC**

6. **HF31:** Approved fire hydrant pavement markers (blue dots) shall be installed at every hydrant.

7. **HF49:** An alternative type of construction may be considered, if it provides an equivalent level of fire resistance. Contact the fire prevention department or city building official for more information. **CFC, CBC**

8. **HF50:** High fire hazard areas FR-1 & FR-2: One-hour fire resistive construction is required for exterior(s) walL(s). **HMC / CBC**

9. **HF51:** The main electrical panel and all sub-panel(s) shall be labeled on inside cover for all circuits. **CEC**

10. **HF52:** Water heater (fuel fired), shall be properly vented to exterior of structure. Water heater shall be seismic strapped to wall and be located 18" above a garage floor. **CBC**

11. **HF53:** A solid core, self-closing and latching door (minimum 1-3/8 inch) shall be installed between an attached garage and living space. **CBC**

12. **HF55:** Commercial exit requirements:
    A. Required exit doors shall be maintained in an operable condition at all times
    B. Required exit doors shall swing outward and away in the direction of exit travel.
    C. Obstructions shall not be placed in the required width of an exit. Exits shall not be blocked or locked shut or obstructed in any manner during business hours.
    D. Exit paths shall be illuminated when structure is occupied.
    E. Exit path illumination shall be supplied from two (2) sources of power when occupant load is one hundred (100) persons or more.
    F. When exit way/exit pathway and/or exit doorway is not easily identified, additional exit signs shall be installed.

13. Exit signs shall be internally or externally illuminated by two lamps or shall be of the self-luminous type. **CFC; CBC**

14. **HF47:** For each chimney, used in conjunction with any fireplace or heating appliance, in which solid or liquid fuel is used, an approved spark arrester shall be installed and visible from the ground. Spark arrester shall be of stainless steel, copper or brass, woven galvanized wire mesh, twelve (12) gauge, and minimum of 3/8" to ½" maximum openings. **CFC; CBC; CMC**

15. **HF60:** Additional plans for access, fire safety systems, fire lanes and signage, gates, storage, or other special conditions may be requested for review, conditioning and approval by the fire marshal.

16. **HF48:** A class "A" roof covering structure with "bird stops" shall be installed.

ACCESS:

17. **HF7:** Fire department **access** roads shall meet the fire dept. minimum unobstructed width of twenty (20) feet. (twenty-six (26) feet within FR-1&2 zones). **This standard shall not lessen other agency requirements.** Access roads shall be paved (asphalt/concrete) and in place **prior** to delivery of combustible building materials on site. Roads shall be designed and constructed to meet adopted city standards. **CFC**

18. **HF8:** All access roads, public, private streets and residential driveways shall maintain a minimum vertical clearance of thirteen (13) feet-six (6) inches. **CFC**

19. **HF9:** Residential driveways shall be paved (asphalt/concrete) and shall provide a minimum width of twelve (**12**) feet. Driveways of this standard shall serve no more than two single family dwellings and shall not exceed 10% in grade. **HMC**

20. **HF10:** Driveways exceeding 150 feet shall have a fire department approved turn-around at the terminus. **CFC / APPENDIX D**

21. **HF11:** Fire department access roadway(s) and/or public/private street(s) exceeding one hundred fifty (**150**) feet in length shall provide an approved turn-around at the terminus (**cul-de-sac**). Minimum radius shall be **not less than forty (40)** feet. Or as approved by the fire marshal. Cul-de-sacs providing access to perimeter emergency access roads shall have a minimum radius of forty four **(44)** feet. **CFC / APPENDIX D, SBCO TRANSPORTATION STD**

22. **HF12:** Fire department access roadway(s); public/private street(s) and driveways shall not exceed 12% grade. **CBC / APPENDIX D, HMC**

23. **HF13:** Fire department access roadway(s); shall extend to within one hundred fifty (150) feet of and shall give reasonable access to all portions of the exterior walls of the first story of any building.
An access road, approved by the fire dept., shall be provided to within fifty (50) feet of all structures when the natural grade between access road and structure is in excess of 30%.
Where an approved access road cannot be provided, a fire protection system shall be required and approved by the fire department. **CFC**

24. **HF14:** In **FR-1/FR-2** areas, streets ending in a cul-de-sac shall not exceed **350** feet, in all other areas, non-circulating streets shall not exceed **600** feet in length and shall provide an approved cul-de-sac. **HMC**

25. **HF15:** "Phased" projects may be required to provide a minimum of two (2) remote points of approved access during construction. A secondary access, for fire and other emergency equipment and for routes of escape, which will safely handle evacuations. **CFC - APPENDIX D**

26. **HF19:** **Manually** operated gates across fire department access roadways, public and/or private streets and driveways, shall be equipped with approved emergency key-operated **"KNOX"** padlock or box containing key to open the private lock. For **automatic** gates, a "KNOX" emergency access switch, shall be installed, at location determined by fire department, and shall over-ride all command functions and open gate automatically upon activation. All automatic gates shall have a manual over-ride for use during loss of electric power. "KNOX BOX" request form is available from the fire marshal or may be ordered directly from www.knoxbox.com (specify City of Highland, CA) **CFC – Appendix D Note: The city of Highland also requires an electronic "H" key system (Ord. #320) for multi-family, gated communities or secured storage facilities. HMC**

27. **HF24:** "NO PARKING – FIRE LANE" signs shall be posted at locations designated by fire marshal. Fire lane curbs shall be painted red, with white letters stating, "NO PARKING – FIRE LANE" on top, not face. **CFC - APPENDIX D**

28. **HF54:** commercial and industrial structures-occupancies and gated complexes shall have a "**KNOX BOX**" system installed on the exterior of the building(s) or complex. location of device to be determined by the fire department. The box shall contain keys necessary to gain access and may contain pre-plans and MSDS information as required by the fire department. New and existing multi-tenant commercial buildings shall provide a 'KNOX' box large enough to contain keys to access each individual tenant space. Installation location(s) to be determined by the fire marshal. The box shall contain clearly marked keys to each tenant space or other areas as determined by the fire marshal. **CFC**

29. **HF61:** Aerial fire apparatus access roads. **Where required**: buildings or facilities **exceeding 30-feet** in height above the lowest level of fire dept. Vehicle access shall be provided access roads capable of accommodating aerial apparatus. **Width:** aerial apparatus access roads shall provide a minimum unobstructed width of **26-feet** in the immediate vicinity of any building exceeding 30-feet in height. **Proximity to buildings:** aerial apparatus access roads shall be located a minimum of 15-feet to a maximum of 30-feet from the building, and shall be positioned parallel to one entire side of the structure, as approved by the fire code official. **CFC APPENDIX D**

WATER:

30. **HF25:** Minimum required fire flow, as determined by i.s.o. formula, is as follows:
RESIDENTIAL; GPM =1500; at 20 psi residual; for 2 hour duration.
COMMERCIAL; GPM = 3000; at 20 psi residual; for 3 hour duration.
System shall be looped with minimum eight (8) inch mains; six (6) inch laterals, six (6) inch risers; six (6) inch dia. Hydrants with two 2 ½" outlet(s) and one 4" outlet. **CFC APPENDIX B AND C**

Note: Hydrants shall meet EVWD standards.

31. **HF29:** Fire hydrant spacing shall be:

Single family residential:	600 FEET
Multi-family residential:	300 FEET
High density residential:	300 FEET
Commercial retail:	300 FEET

CFC / APPENDIX B AND C.

Note: Existing fire hydrants (off-site) can be included if they meet spacing requirements. Hydrants shall not be located at the 'bulb' end of cul-de-sacs.

32. **HF26:** Three sets of water delivery system plans, designed to meet the required fire flow for this project and/or development, shall be submitted to the fire department for review and approval. **CFC**

33. **HF27:** Applicant-developer shall provide a letter from the water company serving the project-development, verifying financial arrangements have been made and bonded for the required water improvements. **CFC**

34. **HF28:** Fire hydrants shall be installed, inspected and operational as per approved water system delivery plans **prior** to any framing, construction or delivery of combustible materials to project site. **CFC / CFC**

35. **HF32:** A temporary water storage and delivery system for use during grading and foundation work (no combustible material), meeting fire dept. Fire flow requirements shall be installed prior to framing construction or delivery of combustible materials to project site. **CFC; NFPA – 1142**

36. **HF38:** Approved fire hydrant(s) capable of supplying required fire flow, shall be provided to all premises upon which facilities, buildings or portions of buildings are constructed or moved within the jurisdiction. When any portion of the facility or building protected is in excess of 400 feet from a fire hydrant on a public street, as measured by an approved route around the exterior of the facility or building, additional fire hydrants or on-site fire hydrants, meeting the required fire flow, shall be provided. **CFC APPENDIX B AND C**

ADDRESSING – IDENTIFICATION:

37. **HF21:** **Commercial** and **multi-family residential** address numbers shall be displayed on all **new and existing** structures in such a manner as to be plainly visible and legible from the access roadway or street. Numerals shall be of a contrasting color to the building and electrically illuminated.
Minimum size of the numerals shall be **8"** height, 3/4" stroke, or as approved by the fire marshal.
Industrial occupancies shall have address numbers of 12" height, 1" stroke and shall be electrically illuminated so as to be visible and legible from access roadway or street.
Note: Depending on height and setback of a building, larger numerals may be required and at additional locations on the building, as determined by a case-by-case review.
HMC

38. **HF18:** Street name signs shall be installed prior to construction on any roadway or phase. Temporary signs may be used as approved by the fire marshal. **CFC**

Note: Permanent signage shall meet City standards as required by the City of Highland Planning Department.

39. **HF17:** The public and/or private roadways serving this project shall be identified with **city** approved names. **CFC**

40. **HF20:** **Residential** address numbers shall be placed on all new and existing structures in such a manner as to be plainly visible and legible from the access roadway or street. Single family dwellings shall have numbers of **4"** height, 1/2" stroke on contrasting background. Address numbers shall be low voltage, automatically electrically illuminated where structure setback exceeds one hundred (100) feet from the access roadway or street, additional non-illuminated numbers 4" in height, 1/2" stroke, on contrasting background shall be displayed at property access entrance. **CFC**

FIRE PROTECTION & ALARM SYSTEMS:

41. **HF34:** Residential automatic fire sprinklers shall be installed according to **NFPA 13D or CRC R313** and fire department requirements. Submit three **(3)** sets of shop plans with material cut sheets and hydraulic calculations for fire dept. review and approval prior to any installation. Submit copy of California C-16 license.

42. The water meter supplying a 13D system shall be of sufficient size (usually 1-inch) to provide the calculated flow requirements of the residential fire sprinkler system. Minimum pipe size beyond the water meter shall be 1-inch. **CFC; CBC; HMC; NFPA**

43. **HF36:** Automatic fire sprinklers shall be installed according to **NFPA 13** and fire dept. requirements. Submit three **(3)** sets of shop plans with material cut sheets and hydraulic calculations, indicating the type of occupancy, type of materials to be stored (if any), for fire dept. review and approval prior to any installation. Submit copy of California C-16 license. **CFC; CBC; HMC**

44. **HF37:** Automatic fire sprinkler control devices (P.I.V & O.S.&Y.) Shall be visible from fire dept. access roadway, and identify system being controlled and address of structure.
Fire Dept. Connection (FDC) shall be located no closer than forty (40) feet and not to exceed one hundred fifty (150) from structure. Required fire hydrant shall have a maximum distance from FDC of thirty (30) feet. FDC shall identify address and system of structure being protected. **CFC**

45. **HF39:** An automatic fixed fire extinguishing system (**UL-300**) shall be installed in the hood and duct system of commercial cooking equipment. Three **(3)** sets of shop plans with material cut sheets and calculations shall be submitted to fire department for review and approval prior to installation. **CFC**

46. **HF41:** A minimum of one 2A-10BC fire extinguisher shall be installed for each 3,000 sq.ft. of floor area. Travel distance to any one fire extinguisher shall not exceed 75 feet. Additional fire extinguishers, size and class to be determined by fire department, may be required. Fire extinguishers shall be serviced bi-annually and shall have a current State Fire Marshall service tag attached. Fire extinguishers are to be serviced every two years and inspected & tagged every year. **CFC; NFPA**

47. **HF42:** A 40BC (K-Type) fire extinguisher shall be installed within 30 feet of commercial food heat-processing equipment. Fire extinguishers shall be serviced annually and shall have a current SFM service tag attached. Fire extinguishers are to be serviced every two years and inspected & tagged every year. **CFC; T-19**

48. **HF43:** An automatic fire detection and alarm system meeting the requirements of CFC 907, CBC and NFPA 72 shall be installed. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC; CBC; NFPA**

49. **HF46:** **SMOKE DETECTORS**, hard wired in series with battery back-up, shall be installed in all sleeping areas and in all hallways and areas/rooms leading to sleeping areas. Smoke detectors shall be installed at the top of all stairways. At least one smoke detector shall be installed on the first floor level. **CARBON MONOXIDE DETECTORS** shall be installed per manufacturer's instructions minimum one per floor where fuel fired appliances and/or an attached garage is present. Units also to be hard wired in series with corresponding smoke detectors **CFC; CBC**

50. **HF60:** California Fire Code, **FIRE SAFETY DURING CONSTRUCTION AND DEMOLITION**, shall apply to this project. it is the responsibility of the project manager to meet with the fire marshal to discuss requirements specific to this project.

51. **HF62**: Additional plans for access, fire safety systems, storage or other special condition may be requested for review, conditioning and approval by the fire marshal.

52. **HF63**: Submit to fire marshal's office: **one copy** of building and/or structure plans for fire department review.

Craig Sanchez, Fire Marshal
City of Highland Fire Prevention
(909) 864-8732 x 248

CITY OF HIGHLAND
PLANNING DIVISION CONDITIONS OF APPROVAL

Date: August 3, 2021

Applicant: D.R. Horton

File/Index: Design Review Application (DRA 21-007) – Vista Verde at Mediterra

Proposal: The construction of 149 single-family homes, a public park, a public trail, a private common area, a private community pool, and a recreation center within Phases 1 & 2 of the Mediterra Planned Development.

Location: North side of Greenspot Road approximately 600 feet east of Santa Paula Street. Assessor's Parcel Numbers: 0297-021-25, 0297-021-26, 0297-021-27 & 0297-021-28

PLANNING CONDITIONS OF APPROVAL

Note: These conditions represent Planning Division conditions only and are meant to be only one part of the Project's overall conditions that include the Fire Department conditions of approval. All required on-site and off-site improvements shall be completed and approved prior to final inspection for occupancy, except where noted.

Design Review Application (DRA 21-007) is conditionally approved, subject to compliance with the requirements as specified below. The conditions listed below are continuing conditions; failure of the Applicant and/or operator to comply with any / all Conditions at any time shall result in initiating revocation of the subject permit.

1. These entitlements shall become null and void:

    a. Unless all conditions have been complied with and the occupancy or use of the land or structures authorized by this conditional use permit, design review and tentative tract map application have occurred within thirty-six (36) months from the approval date, this conditional use permit shall expire and be null and void without further action by the City of Highland.

    b. Where circumstances beyond the control of the Applicant cause delays which do not permit compliance within the time limitation established in this Section, the Planning Commission may grant a one-year extension of time, up to 3 times, for a period of not to exceed an additional thirty-six (36) months from the initial approval date off the project. An application for an extension of time must be set forth in writing, stating the reasons for the extension, and must be filed with the community development department no less than 30 calendar days nor more than 90 calendar days prior to the expiration date of the permit

or approval. Such application shall be filed together with the City's processing fee, as established by the City Council.

2. The proposed entitlements permit the 149 single-family homes, a public park, public trails, a private common area, a private community pool, and recreation center within Phases 1 & 2 of the Mediterra Planned Development. Submittal includes a site plan, architectural elevations, grading plans, and landscaping plans.

3. The operator and recorded owner of the property shall submit to the Planning Division written evidence of agreement with all conditions of this approval before the approval becomes effective. Plan check shall begin prior to receipt of this signed documentation.

4. In compliance with the Highland Municipal Code, the Applicant/Owner shall agree, at his/her sole cost and expense, to defend, indemnify, and hold harmless, the City, its officers, employees, agents, and consultants, from any claim, action, or proceeding brought by a third-party against the City, its officers, agents, and employees, which seeks to attack, set aside, challenge, void, or annul an approval of the City Council, Planning Commission, or other decision-making body, including staff, concerning this project. The City may, at its sole discretion, participate at its own expense in the defense of any such action but such participation shall not relieve the Applicant/Owner of his/her obligations under this condition.

5. The Owner/Applicant is responsible for implementing all conditions of approval to the satisfaction of the Community Development Director, City Engineer, and Fire Department. No final inspection or clearances shall be given until all conditions are met. Each condition of approval is separately enforced, and if one of the conditions of approval is found to be invalid by a court of law, all the other conditions shall remain valid and enforceable.

6. The subject property shall be developed in accordance with plans and materials approved by the Planning Commission, on file with the City of Highland Planning Division, and shall be in compliance with all conditions of approval contained herein. Revisions, modification, or deletions of associated plans must be submitted to the Planning Division for review and approval. Revisions may require additional review by the Planning Commission.

7. If the property will remain undeveloped for longer than 18 months after initial grading has been completed, the applicant shall submit an interim landscape plan, consisting of temporary measures for screening, hydro-seeding, and dust control. Such plan shall include the timing of installation of necessary measures, and shall be approved by the Community Development Director.

8. The applicant shall be responsible for making arrangements with the City's franchised waste collection and hauling services provider for any/all construction debris or solid waste generated as a result of this project.

9. Prior to issuance of Building Permits, the Applicant/Contractor/Occupant shall submit and obtain approval from the Public Services Division, a Construction Waste Diversion Plan, in accordance with Section 8.12.285 of the Highland Municipal Code.

10. The frontage and perimeter landscaping, paseos, perimeter walls, and recreational amenities shall be constructed in advance of the first residential Certificate of Occupancy.

11. Conceptual Landscape Plan submitted for review by the City's Landscape Architect shall include the following:

    a. The type and location of all trees, shrubs and groundcover.

    b. All garden and retaining walls noted on the project plans. All walls and fences shall be designed and constructed to incorporate design features such as tree planter wells, variable setback, split-block face, columns, or other such decorative features to provide visual and physical relief along the face of the wall and fence.

    c. Landscape plans in substantial conformance with Chapter 16.40.390 of the Highland Municipal Code (HMC). A minimum of three (3) copies of the landscape plan shall be submitted to the Planning Division for plan check in conjunction with the construction plans, and landscaping shall be installed prior to final inspection. The landscape plans shall incorporate all requirements of HMC Chapter 16.40.390.

    d. Landscape and irrigation specifications shall adhere to the adopted Engineering/Public Works Standards as may be amended from time to time.

12. Egress onto Greenspot Road must have clear line of sight. Tree canopy needs to be high enough to not obstruct any view.

13. Trash enclosures need to be screened with a trellis or solid roof.

14. The Development Impact Fees shall be paid in accordance with City policy.

15. The Project shall comply with the City's Inclusionary Housing Ordinance.

16. An electronic fob will be provided to all tenants to access private gathering areas, such as the community pool gates. Gates will otherwise remain locked at all times.

17. Entry Statements along Greenspot Road at the Portofino Street and Mediterra Parkway entrances shall be embellished as approved by the Community Development Director.

18. Interior residential lots must feature 2 trees onsite. Corner residential lots must feature 3 trees.

19. Entrance at Mediterra Parkway must feature a notable entry statement wall on each side of the roadway with Mediterranean influenced accents and detail as approved by the Community Development Director

20. The access point from Capri Way to the 1N16 trail must feature a lockable vehicular access gate.

21. Picnic tables within Mediterra Park shall be located together and covered by a lattice or solid material shade structure.

STATE OF CALIFORNIA)

COUNTY OF SAN BERNARDINO)

CITY OF HIGHLAND)

I, Camille Goritz, Administrative Assistant III of the City of Highland, California, do hereby certify Resolution No. 2021-014 was duly and regularly adopted by the Planning Commission of the City of Highland, California, at a regular meeting thereof held on the 3rd day of August 2021, by the following vote:

AYES: Amaya, Hamerly, Thomas, Sutorus

NOES:

ABSTAIN: Miller

ABSENT:

Camille Goritz, Administrative Assistant III

STAFF REPORT

TO THE PLANNING COMMISSION

DATE: January 4, 2022

FROM: Lawrence A. Mainez, Community Development Director

PREPARED BY: Kim Stater, Assistant Community Development Director

SUBJECT: General Plan Amendment No. GPA 21-003 to amend three (3) Elements of the Highland General Plan including Adoption of the Sixth (6th) Cycle 2021-2029 Housing Element, Update to the Public Health, Safety, and Environmental Justice Element, and minor amendment of the Circulation Element.

LOCATION: City-wide

RECOMMENDATION: Staff recommends the Planning Commission adopt Resolution No. 2021-_____ recommending the City Council approve General Plan Amendment No. GPA 21-003 to:

a. Adopt the Sixth (6th) Cycle Housing Element for the 8-year planning period of 2021-2029;

b. Adopt the updated Public Health, Safety and Environmental Justice Element;

c. Adopt an Amendment to the Circulation Element deleting two (2) street extensions; and

d Adopt a Negative Declaration and direct Staff to file a Notice of Determination with the Clerk of the Board of Supervisors and State Clearinghouse.

PUBLIC NOTICE: As required by City Council Resolution, a Notice of Public Hearing was posted at the City's three designated posting locations and on December 24, 2021, a Display Ad was published in the Highland Community News. In addition, the Notice was posted on the City's website and mailed to regional agencies and those who requested notice.

Approved _____	Motion _____	Second _____	Agenda Item No. 3
Denied _____	Ayes _____		
	Noes _____		File No. _____
Continue _____	Abstain _____		
	Absent _____		

Recording Secretary

Community Development Director

BACKGROUND: Under State Planning Land Use Law, a City's General Plan must include a comprehensive, long-term plan for the physical development of both the City and any land outside the City's boundaries that the City determines relates to its Planning (ie. Sphere of Influence).

A General Plan must contain seven (7) Mandatory Elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise and Safety and may include optional Elements it believes appropriate to its jurisdiction. The City of Highland adopted four (4) Optional Elements including Public Services and Facilities Element, Economic Development Element, Community Design Element, and Airport Element.

From time to time these Elements are updated to reflect new and changed conditions within the City and the State Land Use Law. In particular, State Law requires that the Housing Element be updated every eight (8) years, a period referred to as a "Cycle." This established reoccurring schedule ensures that the State's individual regions and communities are performing this task in conjunction with one another and analyzing housing on a regional level. The current Draft Housing Element covers the planning period of October 15, 2021 to October 15, 2029, the "6th Cycle" Housing Element.

New State Law, as a result of massive wildfires in the State, also mandates that when a local agency updates its Housing Element, it shall also update its Public Health and Safety Element, and adopt an Environmental Justice Element if it has not already. Staff has incorporated the Environmental Justice Element into the Public Health and Safety Element.

The City Council established the General Plan Update/Housing Element Ad Hoc Committee to provide direction to Staff as needed while the Elements were being updated. The Committee met on March 29, 2021, May 25, 2021, and November 8, 2021. The Committee provided direction regarding goals, policies, public outreach, inclusionary housing, potential housing sites, zoning and circulation.

PROJECT REVIEW: Updates to the Housing Element, Health, Safety, and Environmental Justice Element, and Circulation Element are summarized below.

HOUSING ELEMENT

The Housing Element addresses the comprehensive housing needs of the City. In accordance with the California Government Code Sections 65585 - 65588, jurisdictions must update their Hosing Elements to outline their existing and projected housing needs, to discuss barriers to providing that housing, and propose actions to address housing needs and barriers.

The Housing Element Organization

Section 65583 of the Government Code requires that the draft 6th Cycle Housing Element include several components: an evaluation of the efficacy of the previous Housing Element's progress, an analysis of the City's population, household, and employment base, and characteristics of the housing stock, a summary of the present and projected housing

needs, a review of potential constraints to meeting the City's identified housing needs, an evaluation of Fair Housing to identify disproportionate housing needs, and a statement of the Housing Plan to address the identified housing needs, including housing goals, policies, objectives, and programs.

These topics are discussed and located in the Housing Element Appendices; Appendix A – 5th Cycle Review, Appendix B – Community Profile, Appendix C – Constraints and Housing Analysis, Appendix D – Affirmatively Further Fair Housing Analysis, and Appendix E – Sites Analysis and Inventory (Attachment 1 – Housing Element).

Regional Housing Needs Assessment:
To property forecast future housing needs for all income groups, Highland must recognize and address its share of the Regional Housing Need Assessment (RHNA) as assigned by the Southern California Association of Governments (SCAG) and the California Department of Housing and Community Development (HCD). Housing is a state and regional issue and is of fundamental importance to the quality of life. SCAG provides regional projects for Southern California for each housing Cycle.

The City of Highland's share of the region's projected 8-year growth in the 6th Cycle is **2,513** units. These units are further divided into four income categories: **619** very low, **409** low, **471** moderate, and **1,014** above moderate-income units.

Cities are not required to build these regionally allocated housing units. However, State Law does require cities to plan to accommodate this projected growth by setting aside land at a variety of densities and instituting programs to facilitate new housing.

Main Body of the Housing Element
The Housing Element utilizes data from the Appendices and the RHNA to identify the Goals and Policies for the 6th Cycle update which are located in the main body of the Element along with a discussion of the Public Engagement and General Plan Consistency.

The Housing Element's five (5) Goals are the backbone for City's plans for helping to meet the existing and projected comprehensive housing needs. The Goals include the following:

Goal 1:	A preserved and enhanced housing stock with high quality neighborhoods.
Goal 2:	A diverse range and adequate supply of housing types that aligns with the needs of all current and future Highland households.
Goal 3:	A City with adequate sites and resources appropriate for accommodating a variety of housing types.
Goal 4:	An affordable housing supply that equitably meets the needs of extremely low-, very low-, low-, and moderate-income households.
Goal 5:	A City with a broad range of housing types to meet the diverse needs of all Highland residents.

From these Goals, the Housing Element Policies and Programs are derived. Programs include a Timeframe in which the objective is expected to be achieved, the Responsible

Agency (i.e. Community Development Dept., Public Works, etc.), Funding Sources, and Relevant Policies to help support the program and achieve the goals.

General Plan Consistency:
The Housing Element must be consistent with all other General Plan Elements as required by Government Code Section 65300.5. The General Plan shall comprise of integrated, internally consistent set of policies. As drafted, the Housing Element Goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Highland were designed through this coordination.

PUBLIC HEALTH, SAFETY, AND ENVIRONMENTAL JUSTICE ELEMENT

The Public Health, Safety and Environmental Justice Element addresses two state-mandated requirements (Attachment 2 – Public Health, Safety and Environmental Justice Element). It prioritizes actions that address the greatest health risks to the City and its residents over the next 20 years. It guides how the City is designed, regulated, and built to ensure that people can access healthy food and places to play, that the air is clean, and that hazards such as wildfires, flooding, and earthquakes will not significantly impact important buildings and services. It also identifies and prioritizes the needs of disadvantaged communities to address compounding health concerns.

Disadvantaged communities (DACs) are areas identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code as an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.

The subject Element looks at five specific public health hazards: access to healthy living, pollution exposure, physical activity, public facilities, and safe and sanitary homes. It also looks at natural health hazards such as air quality, hazardous materials, extreme heat, flooding and extreme storms, geologic hazards including landslides and slope instability, earthquakes and liquefaction and wildfires.

Ten (10) Goals specific to reducing Highland's hazards are:

Goal 1: Protect the health of community members by improving air quality.
Goal 2: Promote a built environment that stays cool.
Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human caused hazards.
Goal 4: Maintain adequate emergency preparedness and response capabilities.
Goal 5: Improve the quality of the built and natural environments to reduce disparate health and environmental impacts.
Goal 6: Green Streets. Prevent future groundwater pollution by implementing green street strategies to support a sustainable approach to stormwater, drainage, groundwater recharge, and landscaping, and incorporating green streets standards and guidelines in all streetscape improvements where feasible.
Goal 7: Ensure safe and sanitary housing for DAC residents.

Goal 8: Ensure that parks, public facilities and services are equitably located and distributed throughout DACs, allowing easy access for residents.

Goal 9: Promote and ensure meaningful and effective participation and community capacity buildings in DACs, especially when developing, adopting, implementing, and enforcing plans and policies related to public health and environmental issues.

Goal 10: Prioritize improvements and programs that address the needs of residents in DACs.

CIRCULATION ELEMENT AMENDMENTS

In conjunction with the review of the Public Health, Safety and Environmental Justice Element, it was determined that two (2) street extensions mentioned in the Circulation Element were obsolete and should be removed. These street segments include the extension of Cone Camp Road from Greenspot Road south to the City of Redlands, and the extension of Greenspot Road near the Greenspot Bridge, east to the City of Yucaipa. Neither of these extensions are necessary or feasible and should be removed during the coordinated update of Elements (Attachment 3 – Circulation Element Amendments).

The General Plan/Housing Element Ad Hoc Committee reviewed these street segments and directed Staff to remove them from the Element. The forecasted land use and circulation in the General Plan Seven Oaks Policy area has changed over time. These regional extensions are not appropriately located and are not desired by either the City of Redlands or City of Yucaipa.

OUTREACH

Multiple public meetings with elected and appointed officials and public involvement are critical to preparing a General Plan that is inclusive and comprehensive of the needs and desires of the community it represents. Staff and the City's Consultant conducted several outreach events in person and remotely.

Late 2020 – Summer 2021, an online survey solicited information from the public regarding their current and preferred housing types, housing availability, neighborhood safety and local educational opportunities. The survey was available on the City's website, Facebook and Next-door Apps and mailed to interested parties.

On November 12, 2020, a virtual public workshop was held. The public was invited to hear about the proposed Elements and comment on existing housing conditions, community amenities, hazardous conditions and topics related to the updated Elements.

Follow up stakeholder interviews were conducted following this meeting with individuals and non-profit organizations that provide affordable housing resources to low-income families.

On March 29, 2021, the General Plan/Housing Element Ad Hoc Committee met to discuss the goals and policies drafted for both Elements, public outreach scheduled for April, project timeline, and HCD review of the document.

On May 25, 2021, the General Plan/Housing Element Ad Hoc Committee met to discuss the RHNA, senior housing, accessory dwelling units (ADUs), inclusionary housing, vacant and underutilized housing sites, potential rezoning of properties, and the project timeline.

On June 8, 2021, a Joint Study Session with the City Council and Planning Commission was held to discuss topics included in each of the plans, public outreach, public review, HCD review, comments, plan adoption and final certification.

On July 14, 2021, a public outreach workshop was held specifically to discuss the Environmental Justice aspect of the Amendment. This was a virtual meeting to garner comments and concerns related to housing, parks, sidewalks, streets, air quality, and safe places to exercise and socialize, and policies to reduce health risks.

On August 26, 2021, the Draft Housing Element was provided to HCD for comment. Comments were received on October 25, 2021. The comments are attached as an Exhibit in the document.

On September 30, 2021, the revised Draft Housing Element was posted to the website with notice given on social media accounts (Face Book) and traditional posting locations to solicit review and comment (City Hall, Sam J. Racadio Environmental Learning Center & Library, Fire Station #1).

On November 8, 2021, the General Plan/Housing Element Ad Hoc Committee met to discuss items related to the Circulation Element amendments.

On December 1, 2021, the Initial Study/Negative Declaration and the latest Draft Housing Element and Health, Safety and Environmental Justice Elements were made available to the public for review at City Hall and the City's website.

ENVIRONMENTAL REVIEW: Pursuant to the Environmental Quality Act (CEQA) an Initial Study was prepared for the project (Attachment 4 – Initial Study / Negative Declaration). On December 1, 2021, the Initial Study/Negative Declaration (IS/ND) was made available for a thirty (30) day review period.

The Housing Element and Public Health, Safety and Environmental Justice Element updates are policy documents and adoption of the elements alone would not produce environmental impacts. The Housing Element does not identify or permit any projects. The Health, Safety and Environmental Justice Element outlines actions to address and recover from natural, and human caused disasters. Their adoption does not have the potential to result in environmental impacts, and a Negative Declaration is proposed for adoption. The minor amendments recommended to the Circulation Element are a reflection of obsolete regional connectors. There is no physical development related to the removal.

PUBLIC COMMENT: Staff received one written comment letter dated June 22, 2021. The concerns in the letter were related to the City's housing needs, multi-family housing management, potential apartment locations, traffic, crime, blight, and environmental impacts. These concerns were addressed in the project's environmental evaluation and Housing Element.

CONCLUSION: Planning Commission comments will be taken at the January 4, 2022 Public Hearing. Those comments in conjunction with final Staff and City Attorney comments may necessitate modifications to the Drafts. A revised and Final Draft will be presented to the City Council at their January 25, 2022 meeting. The Council will review and may approve the documents at which time the Public Health, Safety and Environmental Justice Element and amendments to the Circulation Element will be complete. The Housing Element will be provided to HCD for final certification.

Attachments:

1. Housing Element
2. Public, Health, Safety and Environmental Justice Element
3. Circulation Element Amendments
4. Initial Study/Negative Declaration
5. Resolution No. 2021 - ___ Recommending the City Council approve General Plan Amendment 21-003

ATTACHMENT 1

Housing Element

(Bound copy under separate cover)

ATTACHMENT 2

Public Health, Safety and Environmental Justice Element



6. Public Health, Safety, and Environmental Justice Element

1

INTRODUCTION

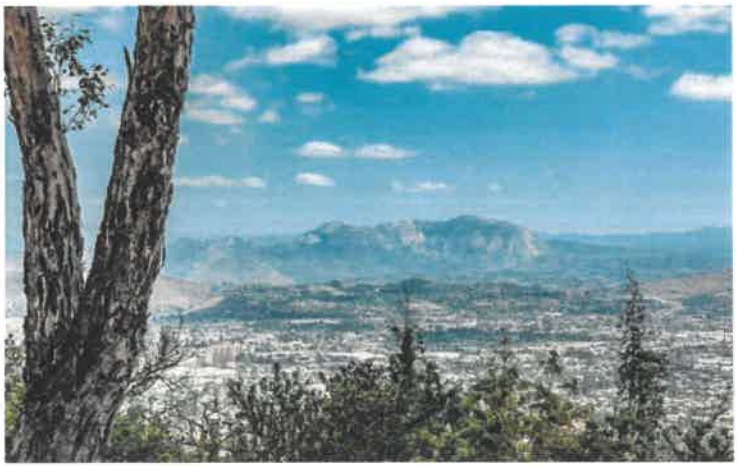
Introduction

Healthy living, public safety, and emergency response are top priorities for the City of Highland (City), helping to make it a great place to live. The Public Health, Safety, and Environmental Justice Element of the General Plan guides the City in creating a safe and healthy place for everyone.The Public Health, Safety, and Environmental Justice Element combines two required Elements: Safety and Environmental Justice. The Safety Element is a required Element and must be addressed by every city in California. Environmental Justice is a required Element in cities with disadvantaged communities (**DACs**).

This Element helps prioritize actions that address the greatest health risks to the City in the next 20 years. The Public Health, Safety, and Environmental Justice Element guides how the City is built to ensure that people can access healthy food and places to play, regulates which important buildings and services can be built in hazardous areas, and uses nature to improve the City's air quality and provide shade on hot days. The Public Health, Safety, and Environmental Justice Element also prioritizes the needs of DACs, and addresses the compounding health concerns in these communities.The Public Health, Safety, and Environmental Justice Elementis closely linked to two other Elements of the General Plan: the Land Use Element and the Conservation Element. The Land Use Element regulates where homes, business, and industry can be in Highland and how largethey can be, and the Public Health, Safety, and Environmental Justice Element recommends where parks, community gardens, and first responder facilities should be placed.The Conservation Element addresses how the City uses natural resources such as water andtrees, and the Public Health, Safety, and Environmental Justice Element addresses how theseresources could be affected by hazard events and climate change, and how natural resources can be used to make the community healthier. The Existing Conditions section of this Element outlines each public health concern facing the City, and the Goals, Policies, and Actions section outlines the City's public health and safety roadmap to 2040.

DISADVANTAGED COMMUNITIES (DACS)

"'Disadvantaged communities' means an area identified by the California Environmental Protection Agency Pursuant to Section 39711of the Health and Safety Code oran area that is a low-income areathat is disproportionately affectedby environmental pollution andother hazards that can lead tonegative health effects, exposure, or environmental degradation."



2

OUTREACH TO THE ENVIRONMENTAL JUSTICE COMMUNITIES

Defining Environmental Justice Communities

The Office of Planning and Research requires jurisdictions with census tracts scoring above75% in **CalEnviroScreen** to address **environmental justice**. Using CalEnviroScreen,seven census tracts in the City score above 75% (see **Figure 1**).

CALENVIROSCREEN

A mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. CalEnviroScreen ranks communities by census tract based on data that are available from State and Federal government sources. Those census tracts that are above the 75th percentile on CalEnviroScreen are considered disadvantaged and are most vulnerable to climate change. This General Plan uses CalEnviroScreen 3.0, which was updated in June 2018.

Summary

Public outreach methods were designed to meet a wide range of community members and generate ideas and feedback representing the broad perspectives of local residents. Due to the global COVID-19 pandemic, virtual outreach was primarily pursued to ensure barriers due to health and technology were not a burden on community members' ability to participate. To achieve this goal,2 community outreach meetings were held, 5 stakeholder interviews completed, and 131 survey responses collected.

Community members raised safety and environmental justice issues throughout the outreach process, and these are addressed through the goals, policies, and actions found at the end of this Element. Copies of the interviews, presentations, and survey results are included in [Appendix A]. The discussion below briefly summarizes the main topics, issues, and concerns brought forth during these efforts.

Community Outreach Meetings

Two virtual community meetings were held on November 12, 2020, and July 14, 2021, the latter focusing specifically on environmental justice. Both meetings provided an overview of the project, opportunities for attendees to ask and respond to questions, information about how to get involved, and an overview of next steps. Spanish translation services were offered for both meetings.

ENVIRONMENTAL JUSTICE

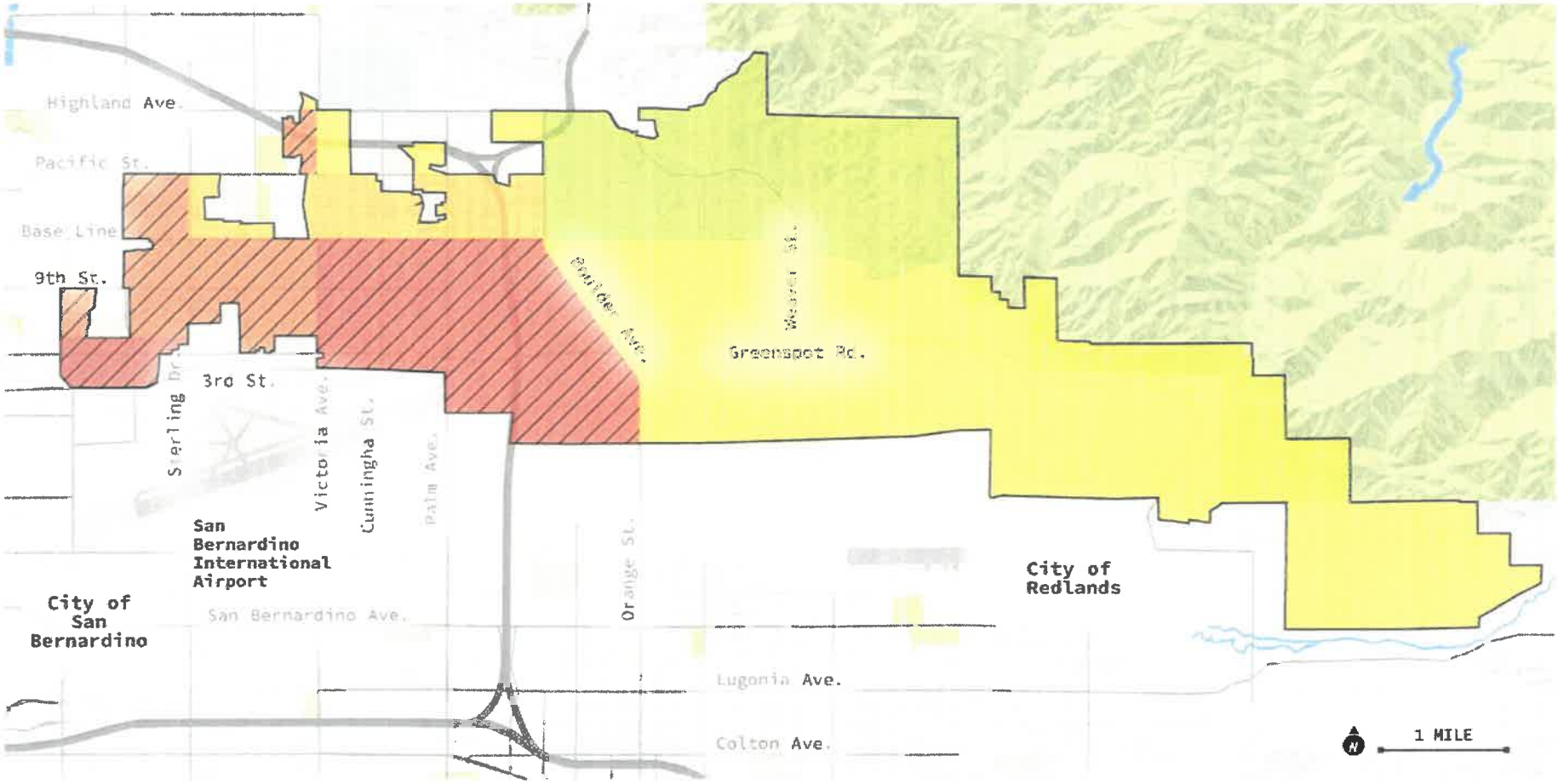
Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice will be achieved when everyone enjoys the same degree of protection from environmental and health hazards, and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.

The first meeting was noticed on the City's website, in the newspaper, on the Facebook page, and on Nextdoor, and bilingual (English and Spanish) flyers were sent tointerested parties and stakeholders.

The list below briefly summarizes key feedback collected during these efforts.

- generally feel safe and happy in Highland, like its slower pace
- there is a lack of amenities and shopping particularly within walking distance
- there is a lack of healthy restaurant options and participants would like to see a variety of new grocery stores
- concerns about fires and homelessness
- interest in the Greenspot Village development, new parks, preserving the historic district, and rebates on bicycles to aid in accessing public transit stops
- value virtual meeting options, support the creation of a digital application to report issues in the City, and value that communication channels (particularly the Facebook page) are in both Spanish and English
- other comments included concerns regarding bicycle infrastructure and safety, earthquakes, air quality, speeding, and illegal trash dumping; interest in pedestrian crosswalks; need for more sidewalks and park maintenance; support for timed stoplights to improve air quality and traffic; support for street sweeping to increase bike lane accessibility; support for tree planting to cool the City; interest in a connector to the rail line; like bike lanes and communal areas

Figure 1 Disadvantaged Communities



Disadvantaged Communities
(CalEnviroScreen Score above 75)

Least Disadvantaged — Most Disadvantaged

Source: OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Accessed January 2021. https://oehha.ca.gov/calenviro-screen/report/calenviroscreen-30

Joint City Council/Planning Commission Meeting

A joint City Council/Planning Commission Meeting was held on June 8, 2021, which included safety and environmental justice topics. The meeting provided an opportunity for public comment ahead of the presentation, a project overview, next steps, and a discussion in which the City Council and Planning Commission members could both ask and respond to questions. The list below includes feedback collected during this meeting related to safety and environmental justice:

- encourages the consideration of additional risk factors in the Safety Element, such as crime
- air pollution and extreme heat are high-level risks, so hopes the City concentrates more on safe walking and biking, wildfire, and even homelessness since it leads to crime
- people will bike if there are safe streets for biking that were in the Active Transportation Plan (adopted in February 2021)
- concerns raised over multi-family housing particularly noting traffic, crime, and financial resources required to provide services, as well as associated environmental, trash, and social issues

Survey

An online survey was available the City's website from September 2020 to August 2021. The survey generated 131 individual responses and included safety and environmental justice topics, 53 of which represent the concerns of DACs.[1] A summary of results is available in [Appendix A].

Key results from the survey include:

- DAC residents were less satisfied with their homes condition, and were less likely to rate it in excellent condition and more likely to indicate their home needed at least one major upgrade.
- The top three neighborhood needs selected among those living west of Interstate 210 included sidewalks and bike lanes, street trees, and parks. Other concerns included speeding, road condition, and cars being left on the street.
- DAC residents indicated that areas near the airport, warehouses, and major roads were the most polluted, and suggested more greenery, including planting trees, and fewer warehouses to reduce air pollution.
- Approximately 64% of DAC residents indicated that using social media and virtual meeting options would help them get engaged in the public decision-making process in Highland.
- While most respondents indicated that it is easy for them to access affordable healthy food, approximately 25% of DAC residents felt that there was either no convenient or affordable home near their residence. City-wide, residents felt that supporting new grocery stores, farmer's markets, and transforming vacant lots into urban agriculture would improve access to healthy food.
- Additional concerns of DAC residences included a need to prepare more for hazard events, disparities between east and west sides of Highland, homelessness identified as an issue, need for more amenities such as shopping and restaurants

1 The survey asked respondents if they lived east or west of Highway 210. As shown on Figure 4-1, most of communities west of Highway 210 are designated DACs by CalEnviroScreen, and therefore this delineation was used as a proxy for if a respondent lived in a DAC.

Interviews

Five interviews were completed in Spring 2021. Key feedback from these interviews is summarized below.

- Limited park space is offset by existing amenities; parks could be further improved by jogging amenities, more community activities at parks, and generally development of more parks and recreation centers for youth in the west side of the City.
- Park accessibility could be improved by ensuring everyone can safely walk or bike to a park, this could include street improvements on routes leading to parks.
- Safety at parks was a concern, including trash, graffiti, drug use, homelessness issues.
- Some residents felt that community facilities were inconvenient to visit; however, were satisfied with the virtual resources.
- Respondents felt safe walking and biking, and noted that there are bus stops throughout the City; however, would like to see better connections to regional destinations and trains.
- One interviewee noted that it can be difficult to get ahold of the City when there are issues.
- Residents expressed an interest quality shopping to be able to spend money locally.
- Respondents expressed a desire for increased neighborhood identify and pride in the DACs.

3

EXISTING CONDITIONS

This section outlines the current risk and equity concerns the City faces from natural and public health hazards. For each hazard, this assessment explains what the hazard is and what causes it to occur in Highland. Next the assessment maps where in Highland is most affected by this hazard. From there, this assessment explains who is most vulnerable to each hazard. Then, this assessment explains how the City is already addressing this hazard. Finally, for each natural hazard, this assessment addresses when the hazard occurs; this includes if the hazard is seasonal or is forecasted to get worse as a result of climate change.

This section addresses five public health hazards (access to healthy living, pollution exposure, physical activity, public facilities, and safe and sanitary homes) and four natural hazards (extreme heat, flooding, geologic hazards, and wildfires).

PUBLIC HEALTH AND CHRONIC HAZARDS

The places where people live can affect their health. In a healthy community, everyone has access to healthy food, parks, and safe streets; however, low-income communities often have fewer of these healthy resources, and have higher rates of chronic diseases and lower lifespans as a result.[1] As shown in **Table 3-1**, Health Indicators, Highland often scores in the lowest health indicator quartile in comparison to all California census tracts.

Table 3-1. Health Indicators

Health Indicator	Location		
	DAC	Non-DAC	City-Wide
Asthma[1]	84.77	63.14	72.05
Cardiovascular Disease[2]	11.58	9.85	10.56
Diabetes[3]*	11.56%	12.06%	11.81%
Obesity[4]*	34.92%	27.86%	31.39%
Low Birth Weight[5]	6.13%	6.14%	6.14%

Sources: California Office of Environment Health Hazard Assessment. 2020. "CalEnviroScreen." Accessed July 9, 2020. https://oehha.ca.gov/calenviroscreen.
Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.
Legend: Quartile 1 = Good, Quartile 2 = Moderate, Quartile 3 = Poor, [illegible]

1. Asthma emergency department visits per 10,000 people
2. Heart attack emergency department visits per 10,000 people
3. Percent of adults with diabetes
4. Percent of adults with a body mass index over 30 kg/m²
5. Percent of low-birth-weight infants

*** Multiple census tracts did not have data collected for this statistic.**

1 McCullough, M., D. Feskanich, M. Stampfer, E. Giovannucci, E. Rimm, F. Hu, D. Spiegelman, D. Hunter, G. Colditz, and W. Willett. 2002. "Diet Quality and Major Chronic Disease Risk in Men and Women: Moving toward Improved Dietary Guidance." American Journal of Clinical Nutrition 76(6): 1261–1271.

Healthy Food

WHAT

Healthy food is essential for all people, but it can be hard to access and afford for some community members. Having access to affordable healthy food can encourage a healthier diet, lower the risk of chronic disease, and reduce food insecurity[2]. Studies have shown that people who live near grocery stores have better health outcomes.[3] For community members without a car, being able to walk or bike to a grocery store or other source of healthy food is imperative.

WHERE

Highland is well-served by grocery stores. Most of the grocery stores are located west of Interstate 210 in the commercial areas of Highland (see **Figure 2**). Areas of Highland where households are less likely to own a car are generally within walking or biking distance of a grocery store.[4]

Community gardens and farmer's markets can be important sources of healthy foods in communities without supermarkets. Vacant City-owned parcels in neighborhoods with limited food access shouldbe evaluated for their potential to be converted into community gardens, farmer's markets, or food distribution locations. **Figure 2** shows vacant parcels in the food deserts in Highland's DACs.

WHO

Those most in need of nearby grocery stores include low-income residents and households without access to a car. The majority of low-income residents and households without access to a car are located in Highland's DACs.[5] The majority of grocery stores in Highland are on the western side, which aligns with the locations of Highland's DACs. This makes nearly all households located in DACs within biking distance to a grocery store, and 42% within walking distance. Access to grocery stores can be seen in Table 4-2, Food Access Vulnerability. Non-DAC households are far less likely to be able to access grocery stores by bike or by walking, but because most households in non-DAC communities have access to a car, there are less health risks to living farther away from a grocery store.

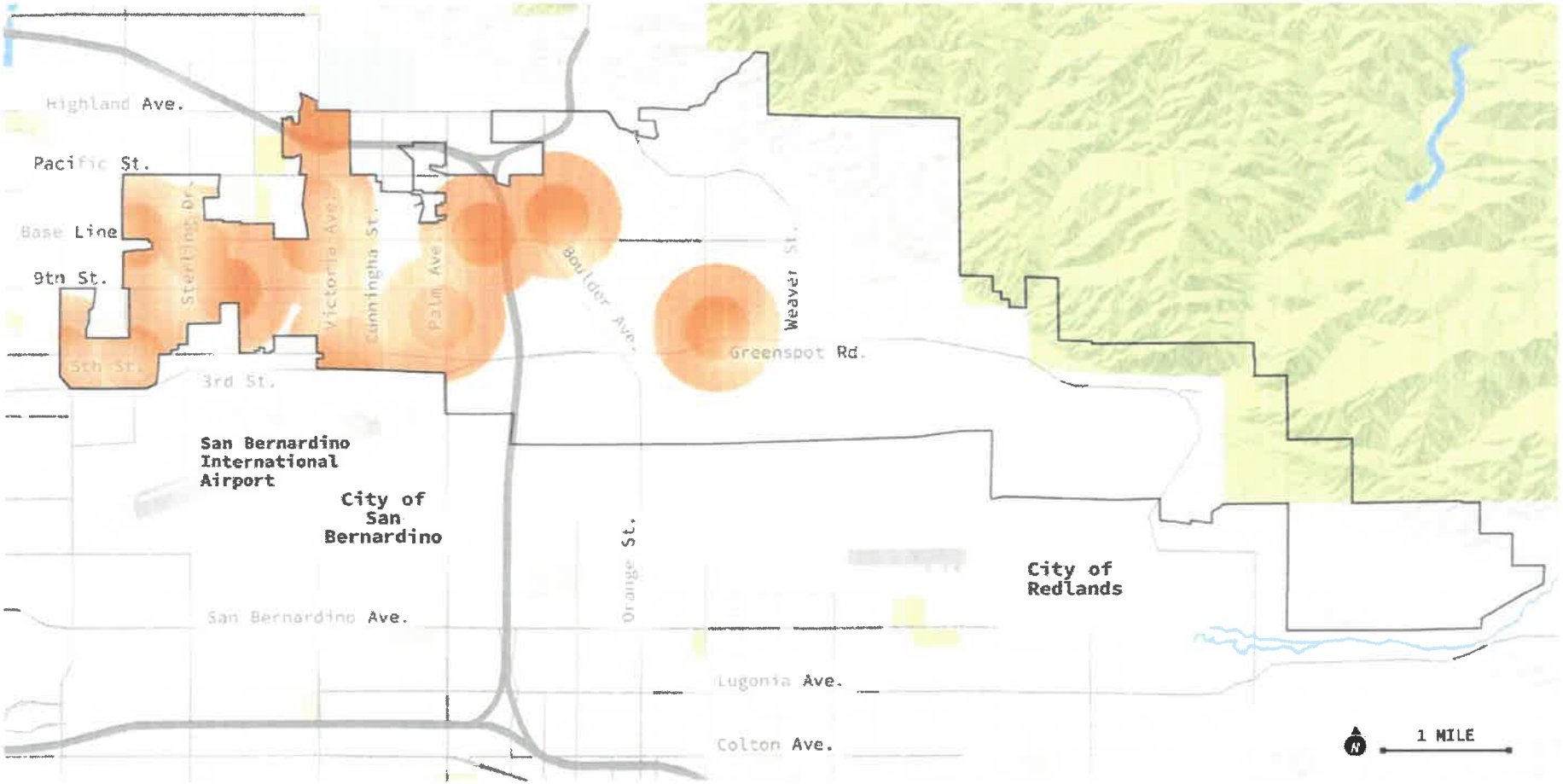
2 McCullough, M., D. Feskanich, M. Stampfer, E. Giovannucci, E. Rimm, F. Hu, D. Spiegelman, D. Hunter, G. Colditz, and W. Willett. 2002. "Diet Quality and Major Chronic Disease Risk in Men and Women: Moving toward Improved Dietary Guidance." American Journal of Clinical Nutrition 76 (6): 1261–1271.

3 PolicyLink. 2018. "The Grocery Gap." https://healthyplacesindex.org/wp-content/uploads/2018/01/policy_link_grocery_gap.pdf.

4 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

5 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

Figure 2 Food Access



Walking Distance to a Grocery Store (1/4 mile)

Biking Distance to a Grocery Store (1/2 mile)

Source: City of Highland. 2020.

Table 3-2. Food Access Vulnerability

Distance	Percent of Households		
	DAC	Non-DAC	City-Wide
Poverty[1]	70.27%	33.20%	48.46%
Access to a Car[2]	86.47%	95.71%	91.91%
Walking Distance to Grocery Store	42.25%	17.01%	27.29%
Biking Distance to Grocery Store	94.68%	44.42%	64.89%

Source: City of Highland

Legend: Quartile 1 = Good, Quartile 2 = Moderate, Quartile 3 = Poor, Quartile 4 = Challenged

1. Percent of the population with incomes less than two times the federal poverty level
2. Percent of households with access to an automobile

Note: Rows without highlighting are unable to be compared to the State due to a lack of available statewide data.

HOW

Several non-profit and community-based organizations provide food to families in need at three locations in Highland, helping to close the gap on food access vulnerability. Immanuel Baptist Church, located at 28355 Base Line, provides fresh produce and pantry items once a week to be picked up on site. The Highland Senior Center, located at 3102 E. Highland Avenue, also provides a weekly grocery program offering meats, produce, and non-perishables. The Senior Center serves low- and no-cost lunches on site Monday through Friday, and during COVID-19, packaged lunches and dinners to go to be picked up in a drive-through format. Highland Community Cross Church, at 6955 Palm Avenue, keeps a community pantry that also offers personal hygiene items.

Parks

WHAT

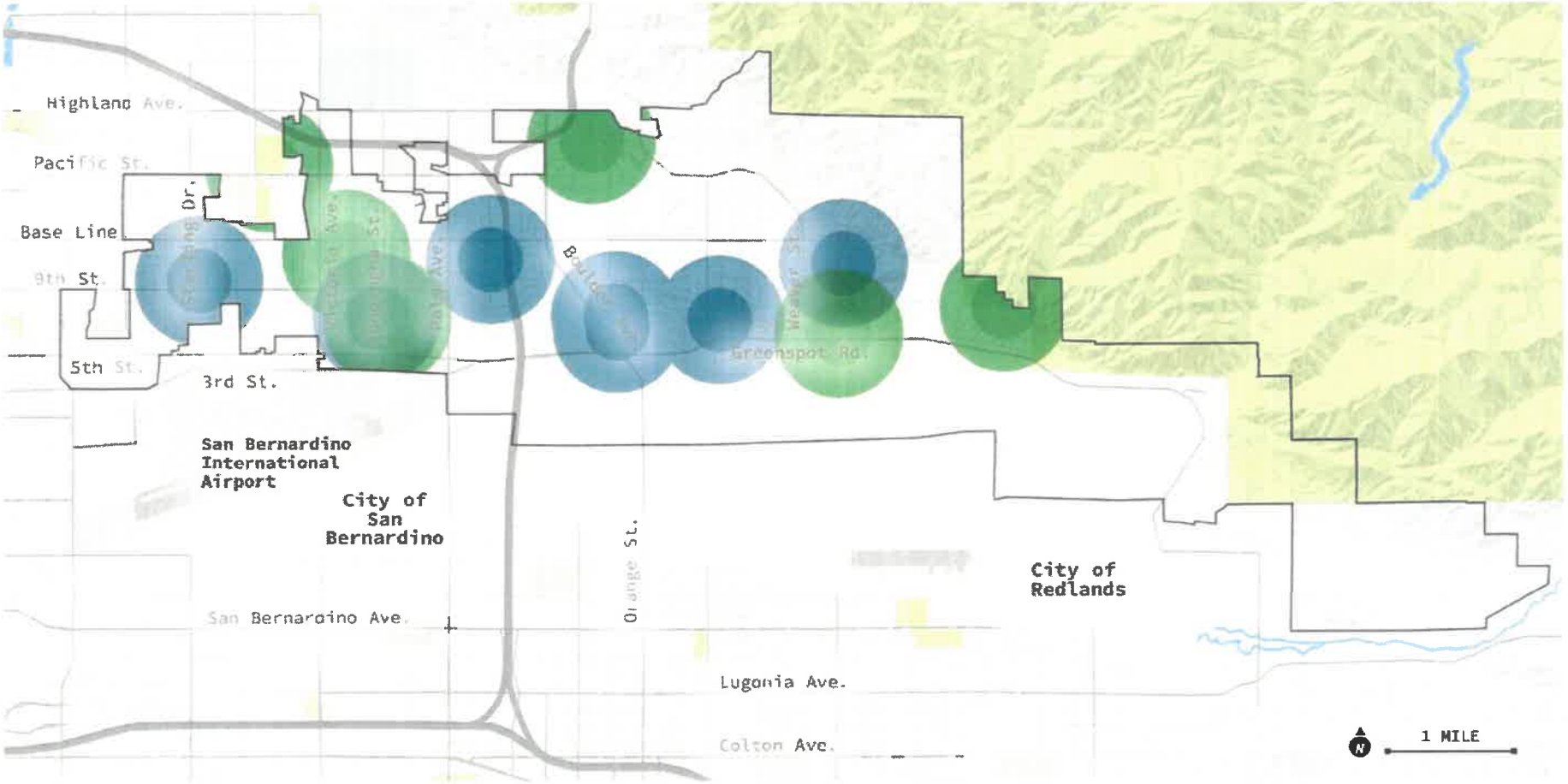
Parks are important gathering spaces for safe and healthy recreation, which is an important aspect to preventing chronic disease.[6] Parks provide places for children to play and adults to walk. Parks, and the trees inside them, can clean the air and cool down hot days.

WHERE

Highland has five dedicated parks: Cunningham Park, Canyon Oaks Park, Aurantia Park, Highland Community Park, and Oak Creek Park. Three of these parks are east of Foothill Freeway and two are west of Foothill Freeway. The 17-acre Highland Community Park is the home of Central Little League and multiple recreation organizations. In addition to these parks, the City has an agreement with the following schools for use of their outdoor recreation space as parks when school is not in session: Cypress Elementary School, Warm Springs Elementary School, San Gorgonio High School, Thompson Elementary School, Highland Grove Elementary School, Beattie Middle School, Arroyo Verde Elementary School, and Cram Elementary School. **Figure 3** shows City parks and schools that participate in this agreement.

6 Sherer, P.M. 2006. The Benefits of Parks: Why America Needs More City Parks and Open Space. Trust for Public Land. http://www.tpl.org/content_documents/parks_for_people_Jul2005.pdf.

Figure 3 Park Access



Walking Distance to a City Park (1/4 mile)

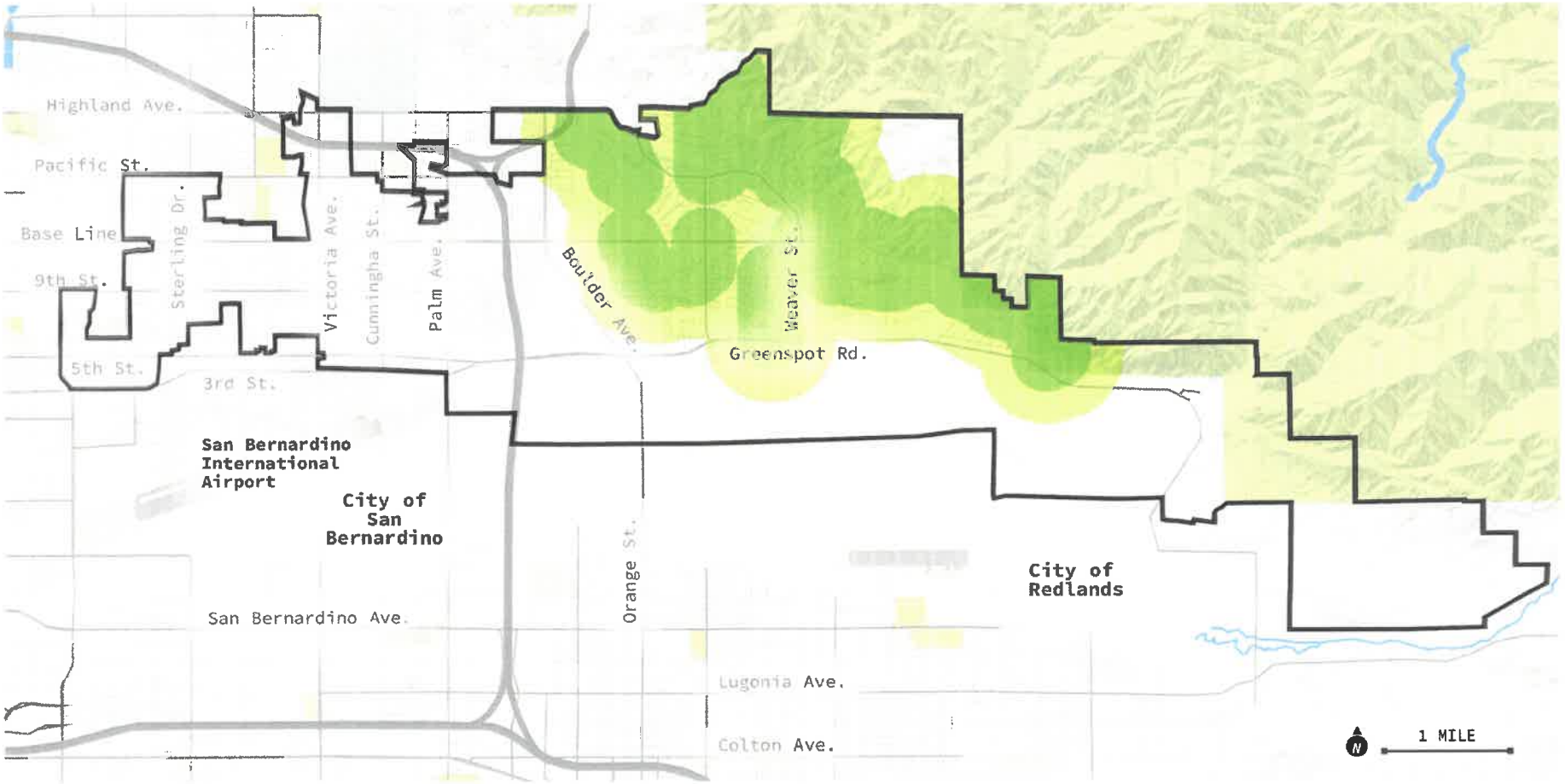
Biking Distance to a City Park (1/2 mile)

Walking Distance to a School Park (1/4 mile)

Biking Distance to a School Park (1/2 mile)

Source: City of Highland. 2020.

Figure 4 Access to Trails



Walking Distance to a Trail (1/4 mile)

Biking Distance to a Trail (1/2 mile)

Source: City of Highland

In addition to parks, the City builds and maintains an extensive network of multi-use trails. The trails connect regional systems, such as the Santa Ana River Trail and City Creek Trail, with schools, parks, neighborhoods, and shopping. The City has developed a close relationship with the San Bernardino County Flood Control District to share facilities and connect various communities via existing roadways. These trails provide alternative routes to schools, shopping, and recreation. **Figure 4** shows the locations of trails in Highland.

WHO

As shown in **Table 3-3**, Park Access, Highland's DACs are more likely to live within walking and biking distance of a park, whereas residents of non-DACs are less likely to live near a park. The percentage of households within walking and biking distance of a park more than doubles when including school parks, which demonstrates the value of these agreements. Sixty-seven percent of Highland residents live within biking distance to a park or school available for recreation.

Table 3-3. Park Access

Distance	Percent of Households		
	DAC	Non-DAC	City-Wide
Walking Distance to a City Park	12.81%	5.72%	8.60%
Biking Distance to a City Park	33.93%	29.47%	31.29%
Walking Distance to a City Park or School Park	26.37%	17.36%	22.11%
Biking Distance to a City Park or School Park	74.26%	63.13%	67.67%

Legend: Quartile 1 = Good, Quartile 2 = Moderate, Quartile 3 = Poor, Quartile 4 = Challenged

Note: Rows without highlighting are unable to be compared to the State due to a lack of available statewide data.

HOW

The City is working to provide parks and recreation facilities to serve its growing population. Efforts include using development impact fees and capital budgeting, and negotiating land acquisition agreements. Concurrently, the City negotiates with individual Planned Development owners to construct public parks that are to be maintained by private development. Examples include the Mediterra Planned Development on Greenspot Road and Mastercraft 46 on Base Line. Policies listed within the City's Conservation and Open Space Element address the supply of parks, the diverse needs of residents, park design, safety, and park accessibility.

Public Transportation

WHAT

People's ability to get from their home to destinations such as work, a grocery store, or a laundry service is essential for day-to-day life. Without access to a car, active transportation and public transportation are the only options.

WHERE

Highland is served by public transportation offered by Omnitrans. Four different bus routes run through Highland east/west on Highland Avenue, Baseline Road, and 9th Street. Routes circle around and run north/south on Del Rosa Drive, Central Avenue, Palm Avenue, Boulder Avenue, and Church Street. Eastern Highland is served by bus Omnitrans Route 15 that has stops on Base Line near Church Street and on Church Street near Greenspot Road, adjacent to the Villages at East Highland shopping center. Should development occur at the eastern-most portion of Highland, east of the Greenspot Road Bridge, additional service will likely be added. In the future there is potential for adding another route to serve East Highland on 5th Street/Greenspot Road from Boulder Avenue to Del Rosa Drive, where roadway infrastructure for future stops has already been constructed. Other long-term possibilities for route additions include a north/south route along Palm Avenue from Baseline Road to Pacific Street, and an east/west route from Pacific Street at Palm Avenue to Waterman Avenue.

WHO

As shown in **Table 3-4**, Public Transportation Access, Highland's DACs have the highest level of accessto all forms of public transportation, which can be attributed to their urban nature and proximity toother urban areas.[7] Residents of the DACs have less access to cars than non-DAC residents, with 86% of households having access to a car. The DACs rank in the lowest health indicator quartile in comparison to all California census tracts.

Table 3-4. Public Transportation Access

Distance	Percent of Households		
	DACs	**Non-DACs**	**City-Wide**
Access to a Car[1]	86%	96%	91%
Walking to Bus Stop	**75%**	**42%**	**56%**
Biking Distance to Bus Stop	**99%**	**70%**	**83%**

Source: Transitland, Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.
Legend: Quartile 1 = Good, Quartile 2 = Moderate, Quartile 3 = Poor, Quartile 4 = Challenged

1. Percent of households with access to a car

Note: Rows without highlighting are unable to be compared to the State due to a lack of available statewide data.

7 Transitland, Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

HOW

Within the City's Circulation Element are policies that address public transportation. One goal specifically targets the promotion and improvement of bus service and paratransit. For example, working toward transit service extensions into eastern Highland is included as a policy. Additionally, support for local transit systems for youth and older adults is another policy under this goal. Both of these address current issues with access and circulation for less-mobile individuals.

Libraries and Community Centers

WHAT

Libraries and community centers provide important community amenities that improve quality of life. Amenities such as community events, Wi-Fi, educational opportunities, air conditioning, technology, and recreation might all be offered in these public spaces.

WHERE

There are three community facilities in Highland: the Highland Branch Library, the Sam Racadio Environmental Learning Center, and the Jerry Lewis Community Center. These facilities are located adjacent to each other along Central Avenue in mid-City.

WHO

These facilities were strategically located in the center of Highland and adjacent to each other to providea "one-stop-shop" of community recreation, education, socialization, and services. They are located within the vicinity of Cypress Elementary School, the Highland Police Department, Fire Station #1, Jeffrey Court Senior Apartments, the Highland Senior Center, Highland Head Start Preschool, and San Bernardino International Airport. Because of Highland's linear shape, there are residents at the east and west ends unable to easily reach these facilities via biking or walking, but it is directly served by an Omnitrans bus stop, and the City Creek Trail is located directly to the south. Central Avenue and nearby 9th Street have been widened and improved to upgrade non-motorized travel (see **Table 3-5**, Community Facilities).

Table 3-5. Community Facilities

Distance	Percent of Households		
	DACs	Non-DACs	City-Wide
Walking Distance to Community Facility	5.36%	0%	2.18%
Biking Distance to Community Facility	21.24%	0%	8.65%

Source: City of Highland

HOW

The City is committed to adding a cultural facility, as highlighted in the City's Public Facilities Element. The City is working to create a City of Highland Historic Museum to be located at the corner of Palm Avenue and Main Street, which is in northern-central Highland. The City is also considering a Civic Center in the City's proposed Town Center. The addition of these two facilities would add access and services to a much greater portion of the community.

Safe Walking and Biking

WHAT

Walking and biking around a community offer affordable and healthy ways to get around. Walking and biking also reduce air pollution, traffic, and wear and tear on local roads. Providing safe places to walk and bike are important in a healthy community, especially if community members walk or bike as part of their regular commute to school or work.

WHERE

Generally, west Highland and the DACs are more walkable than east Highland because there are more commercial uses and it is easier to access daily errands by bike or foot. Residents of these areas are less likely to own a car and less likely to need one due to the walkable design.[8] Many intersections in West Highland, notably along Baseline Road, have been improved with crosswalks, signals, and crossing guards to facilitate safety at highly utilized intersections.

WHO

Walking and biking can feel or be more unsafe for certain individuals than others. Older adults and people with physical disabilities may be less able to cross an intersection during the time allotted by a stop light. People who are less-frequent bikers may be less comfortable navigating more-trafficked areas of town. However, people who regularly bike or walk to work or other regular errands are most at risk because they are on the street the most. The City has low rates of walkers and bikers getting hit by cars; however, comparatively speaking, it is more common in the DAC communities where people tend to walk and bike more often.[9] Given how many more people walk and bike in the DACs, as demonstrated by the proportion of active commuters, the slight increase in injuries does not indicate that those intersections are more dangerous (see **Table 3-6**, Pedestrian Safety).

Table 3-6. Pedestrian Safety

Distance	Location		
	DACs	**Non-DACs**	**City-Wide**
Pedestrian Injuries[1]	5.69	4.55	5.12
Active Commuters[2]	**6.55%**	**2.49%**	**4.16%**

Source: Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

Legend: Quartile 1 = Good, Quartile 2 = Moderate, Quartile 3 = Poor, Quartile 4 = Challenged

1. Annual average rate of severe and fatal pedestrian injuries per 100,000 population

2. Percentage of workers 16 years and older who commute to work by transit, walking, or cycling

Note: Rows without highlighting are unable to be compared to the State due to a lack of available statewide data.

8 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

9 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

HOW

Within the City's Circulation Element there are policies that address active transportation within the community. Under the goal of providing a safe circulation system, policies have identified multiple ways to improve the safety of walking and biking for residents. Additionally, the protection and encouragement of bike travel is listed as another goal, and it prioritizes infrastructure and major destinations in the community. The expansion of bike and walking paths is part of the Conservation and Open Space Element's goals and policies. The City is also implementing a Safe Routes to School Program to improve conditions and implementing policies identified in the newly adopted Active Transportation Plan.

Safe and Sanitary Homes

WHAT

Low-income residents are more likely to live in structures built before building standards regulating lead paint, asbestos, and other hazards were adopted. Living in these older homes, without removal of such toxins, can have significant health impacts. Many low-income communities have a higher proportion of old housing stock and are thus disproportionately exposed to these health threats. Older housing stock might also have poor ventilation, leading to uncomfortable indoor temperatures and excessive moisture, which can lead to mold. Other indoor housing conditions that can be common in older and less-expensive housing include pests and vermin. Finally, overcrowding, which often is a result of a lack of affordable housing, is a serious issue that impacts safe and sanitary homes. According to the World Health Organization, overcrowding poses health risks by creating unsanitary conditions that can contribute to the spread of disease.[10]

WHERE

The City's Community Development Block Grant Target Areas were identified as containing older housing stock and having a significant number of code violations. The Target Areas suffer from blighted conditions such as a lack of property maintenance, substandard living conditions, and illegal and unsafe structures. To halt ongoing deterioration of these neighborhoods, the City implemented a number of programs, including an Enhanced Code Enforcement Program. It reduces the number of property violations, substandard conditions, trash and debris, overgrown vegetation, illegal construction, and inoperative vehicles. While correcting violations, staff assists in the development and administration of housing and economic development programs, assisting disadvantaged families. City staff conduct daily inspections and issue warnings and violations as necessary. They provide residents with referrals to housing advocates, legal aid, and other social services. The City receives assistance from San Bernardino County Animal Control, Weed Abatement, Vector Control, the Sheriff's Office, and homeless advocates. These programs serve families of low, very-low, and extremely-low income. These neighborhoods have the least amount of infrastructure.

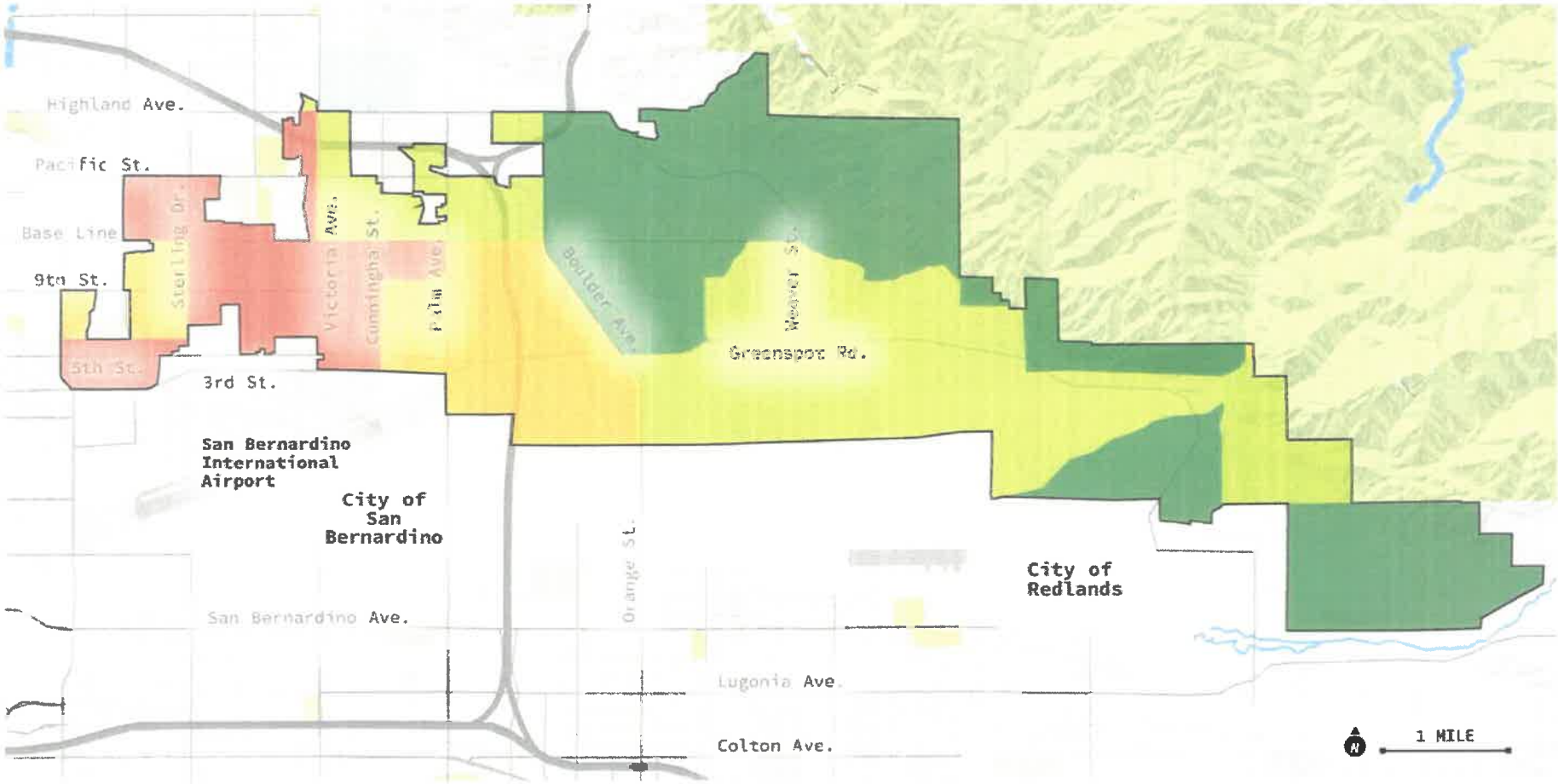
Households in the DACs of Highland are more likely to experience housing burden (see **Figure 5**).[11] This means households are more likely to be low income[12] and spend more than 50% of their income on housing. This makes it less likely that they can afford to make improvements to homes they own or move from rental properties that are unsanitary. In an effort to avoid increases in rent, these renters also may be less likely to bring up needed repairs to rental owners.

10 WHO (World Health Organization). 2021. "What are the health risks related to overcrowding?" https://www.who.int/water_sanitation_health/emergencies/qa/emergencies_qa9/en/#:~:text=For%20communities%2C%20inadequate%20shelter%20and,the%20population%20density%20is%20high.

11 OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0 "Housing Burden." Accessed January 2021. https://oehha.maps.arcgis.com/apps/webappviewer/index.html?id=aade7e52ae014d8cb7682bb57466eacb.

12 Households are considered low income if they earn less than 8% of the State-wide median income.

Figure 5 Housing Burden



Challenged (bottom 25% of the State)

Poor (50-75% of the State)

Moderate (25-50 % of the State)

Good (top 25% of the State)

Source: OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Accessed January 2021. https://oehha.ca.gov/calenviro-screen/report/calenviroscreen-30

WHO

There is a large disparity in the cost and quality of housing between the DACs and non-DACs in Highland. There are far more renters within Highland's DACs than non-DACs, and there is also a higher proportion of people with severe housing cost burdens, meaning they pay more than 50% of their income on housing costs. Overcrowding and renters with severe housing cost burdens in Highland's DACs rank in the lowest health indicator quartile in comparison to California census tracts (see **Table 3-7**, Housing Indicators).

Table 3-7. Housing Indicators

Housing Indicator	Locations		
	DACs	**Non-DACs**	**City-Wide**
Homeowners[1]	37.09%	70.08%	55.8%
Homeowner Cost Burden[2]	13.74%	8.84%	11.3%
Renters Cost Burden[3]	34.57%	26.3%	31.13%
Overcrowding[4]	22.04%	6.65%	12.47%

Source: Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

Legend: Quartile 1 = Good, Quartile 2 = Moderate, Quartile 3 = Poor, Quartile 4 = Challenged

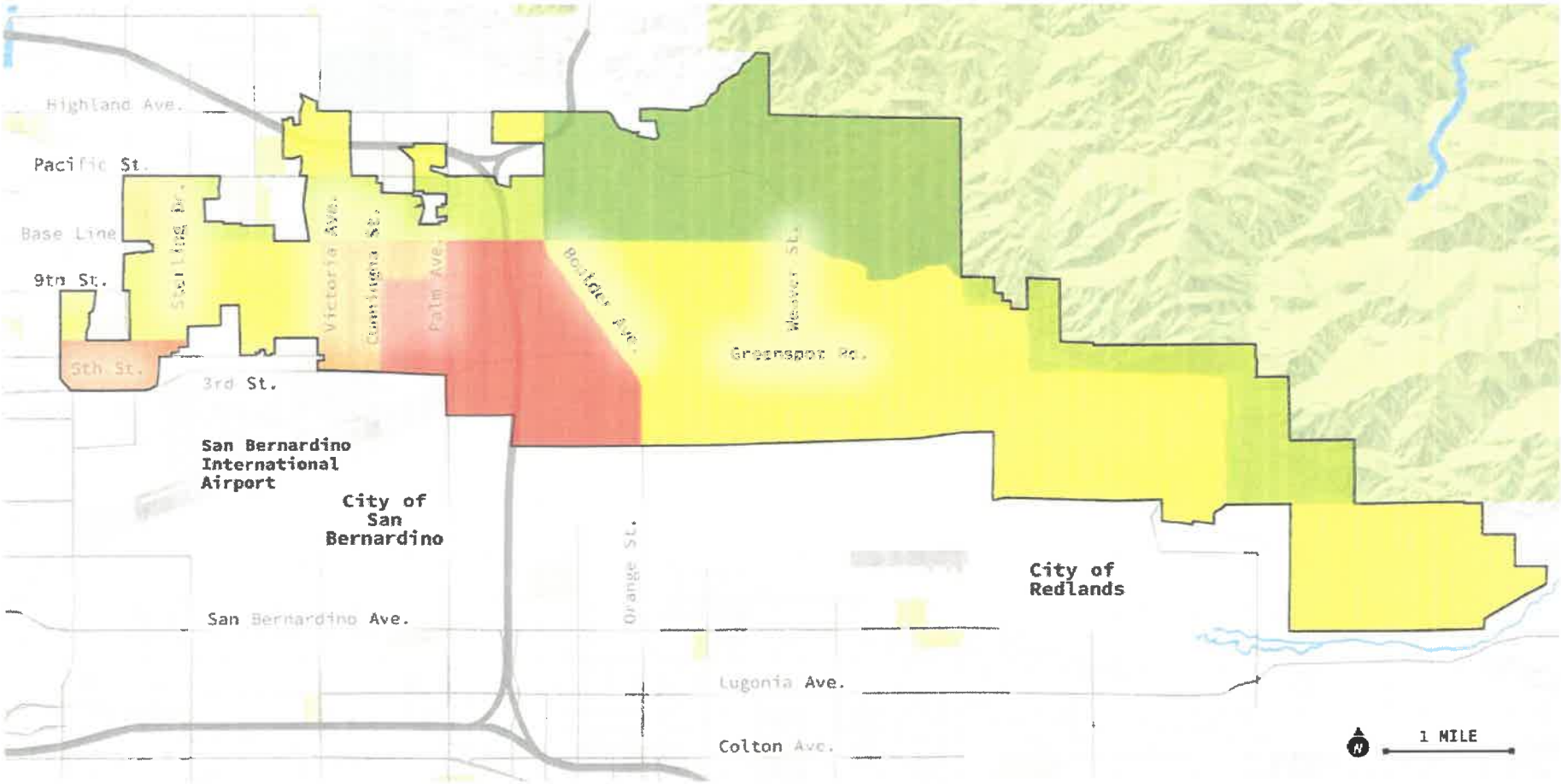
1. Percent homeowners
2. Percent of low-income homeowners who pay more than 50% of their income on housing costs
3. Percent of low-income renters who pay more than 50% of their income on housing costs
4. Percent of households with more than 1 occupant per room

Pollution Exposure

People are exposed every day to pollution from air, food, water, and soil, often from living near industrial land uses that produce hazardous waste, such as car repair centers, gas stations, dry cleaners, manufacturing businesses, and recycling centers. Chemicals from these businesses can get into the soil, water, and air and affect nearby residents. Because these land uses are often grouped together, low-income residences are often in proximity to many polluting businesses, and higher-income areas often do not face the same level of pollution exposure. This combination of limited financial resources and exposure to pollution is the essence of environmental justice.

As shown in **Figure 6**, pollution levels from a range of sources are concentrated in the business park district in the southwestern portion of Highland, especially around the San Bernardino Airport. Similar to many communities, the pollution exposure in Highland is higher in the lower-income areas.

Figure 6 Pollution Exposure



Source: OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Accessed January 2021. https://oehha.ca.gov/calenviro-screen/report/calenviroscreen-30

Air Pollution

WHAT

Ten air pollutants are measured by the State of California. These pollutants are measured separately and compared to healthy levels determined by the State. Air is considered polluted when it does not meet the standards set by the State and Federal governments. Highland is located within the South Coast Air Basin. Air basins were created by the State of California based on where air naturally stagnates. The South Coast Air Basin is a coastal plain with connecting, broad valleys and low hills that extend across Los Angeles and Orange Counties, as well as the western portions of Riverside and San Bernardino Counties. The Pacific Ocean forms the southwestern border, and high mountains surround the rest of the air basin. Currently the South Coast Air Basin is not in attainment for ozone or particulate matter (PM2.5) standards.[13]

The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency that provides direction regarding the management of air quality within the region, which includes Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD is responsible for controlling air pollution mainly from stationary sources such as large power plants, refineries, gas stations, and some consumer products.

Air pollution varies locally as it moves away from the source. The two air pollution monitoring sites closest to Highland are 4th Street and Anderson Elementary School in San Bernardino, and the intersection of North Dearborn Street and Independence Avenue in Redlands. Air pollution is likely worse in communities closer to Interstate 210 and State Route 330, as well as the San Bernardino International Airport.

Ozone

Ground-level ozone is most commonly known as smog. Smog is caused by a chemical reaction when sunlight interacts with nitrogen oxides (NOx) and volatile organic compounds, which are emitted from cars. As temperatures increase, it is anticipated that the amount of ground-level ozone will also increase if the amount of car traffic and other sources of NOx and volatile organic compounds do not decrease. At the Redlands-Dearborn station, ozone exceeded the 8-hour Federal standard 305 times, and exceeded the State and Federal 1-hour standard 16 times in the past 3 three years measured (2016–2018). At the 4th Street station in San Bernardino, ozone exceeded the 8-hour Federal standard 320 times, and exceeded the State and Federal 1-hour standard 31 times in the past 3 years measured (2016–2018).[14]

Some main contributors to the pollutants that form ground-level ozone in Highland are vehicle emissions and industrial processes, specifically near the San Bernardino Airport. Ground-level ozone can cause health issues, including difficulty breathing, coughing, inflamed airways, asthma attacks, and heart disease.

Particulate Matter

Particulate matter is made of microscopic solid and liquids in the air that are small enough to breathe. PM2.5 is 2.5 microns or less in diameter, or 1/28th the thickness of human hair. PM2.5 results from burning fuel for cars, trucks, and industrial processes. PM2.5 is small enough to get into the human bloodstream and can pose a high risk to human health. Similar to ozone, particulate matter causes asthma and heart

13 South Coast Air Quality Management District. 2016. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf.

14 California Air Resources Board. 2018. Air Quality Data Statistics. Accessed August 6, 2020. https://www.arb.ca.gov/adam.

disease.[15] From 2016 through 2018, PM2.5 exceeded 24-hour standards twice at the San Bernardino 4th Street station.[16]

WHERE

Air pollution is often higher in communities with low tree cover, limited park access, and high levels of traffic.[17] In Highland, these communities are located in the west, as shown in **Figure 7**.

WHO

People with existing health conditions, such as asthma and heart disease, are more sensitive to air pollution. These conditions are also often caused by living near sources of air pollution in **fenceline communities.** The average rate of asthma hospitalization is much higher in Highland's DACs than non-DACs.[18]

FENCELINE COMMUNITIES

Fenceline communities are neighborhoods near sources of industrial pollution, such as ports, refineries, and major transportation routes.

Additionally, people who spend more time outdoors, including young children, people who work outdoors, and people who get to work without a car, are often exposed to polluted air at higher rates.

HOW

SCAQMD develops and adopts an Air Quality Management Plan every 3 years in compliance with Federal and State clean air standards. Primarily, Air Quality Management Plans provide municipalities in the region with policy and program options to improve local and regional air quality. Goal 5.19 of the City's Conservation and Open Space Element states, "Continue to support air quality planning through land use policies, outreach efforts and coordination with regional air quality agencies." Related policies involve reducing vehicle miles traveled, more efficiently locating land uses, collaborating with the SCAQMD, community outreach, and other policies focused on improving air quality.

WHEN

Highland's levels of air pollution will increase as a result of climate change and will likely have the greatest impact in summer months when temperatures are highest. Longer warm seasons can contribute to longer pollen seasons, which can increase allergies and asthma episodes.[19]

15 Pope, C.A., R.T. Burnett, M.J. Thun, E.E. Calle, D. Krewski, K. Ito, and G.D. Thurston. 2002. "Lung Cancer, Cardiopulmonary Mortality, and Long-Term Exposure to Fine Particulate Air Pollution." JAMA 287: 1132–1141.

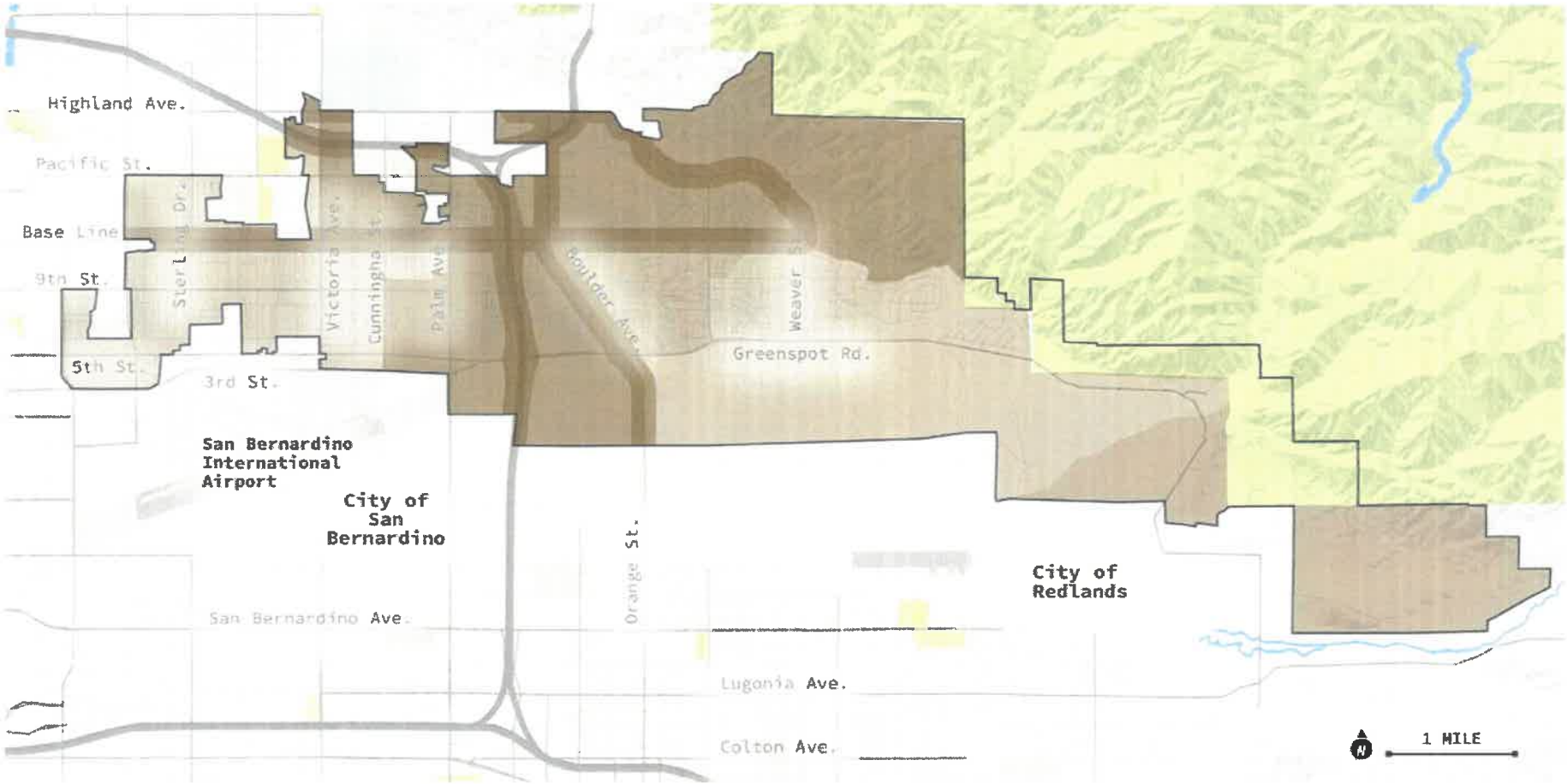
16 California Air Resources Board. 2018. Air Quality Data Statistics. Accessed August 6, 2020. https://www.arb.ca.gov/adam.

17 Frumkin, H., L.D. Frank, and R.J. Jackson. 2004. Urban Sprawl and Public Health: Designing, Planning, and Building for Healthy Communities. Washington, DC: Island Press.

18 California Office of Environment Health Hazard Assessment. 2020. "Asthma." Accessed April 13, 2021. https://oehha.ca.gov/calenviroscreen/indicator/asthma.

19 Hall, A., N. Berg, and K. Reich. 2018. Los Angeles Summary Report. California's Fourth Climate Change Assessment. University of California, Los Angeles. Publication number: SUM-CCCA4-2018-007.

Figure 7 Air Pollution Exposure



Source: PHASC (Public Health Alliance of Southern California) and VCUCSH (Virginia Commonwealth University Center on Society and Health). "HPI Map." California Healthy Places Index. 2019. Accessed August 14, 2019. https://healthyplacesindex.org/map/.

Open Street Map. "OSM Road Network." 2019.https://www.openstreet-map.org/#map=4/38.01/-95.84

Higher temperatures associated with climate change can also lead to an increase in ozone. Although the future level of air pollution will depend, in part, on State laws mandating standards such as fuel efficiency and potential electrification of cars and trucks, the current air quality in San Bernardino County does not meet State standards and receives an "F" from the American Lung Association.[20]

Hazardous Materials

WHAT

Hazardous materials are substances that can cause death, serious illness, or hazard to human health orthe environment when not properly treated, stored, transported, or disposed of. Many householdsubstances are considered hazardous, including gasoline, refrigerants, paint, and some gardening supplies.Nearly all households and businesses have some amount of hazardous waste. Certain businesses, such as gas stations, auto repair, and dry cleaners, generate greater amounts of hazardous waste. Hospitals, clinics,and laboratories generate medical waste, which can also be hazardous. Hazardous wastes are hazardous materials that no longer have practical use but have not yet properly been disposed of.

WHERE

Hazardous materials can potentially be found anywhere as a result of improper disposal or storage, but sites with large concentrations of hazardous materials are catalogued by EnviroStor. EnviroStor is a data management program operated by the Department of Toxic Substances Control that is used to monitor, investigate, permit, and clean up sites with known contaminants.

Highland contains six EnviroStor sites with hazardous materials that require cleanup.[21] Of these EnviroStor sites, four are within areas identified as DACs in CalEnviroScreen 3.0, or areas disproportionately impacted by multiple sources of pollution. A majority of these sites are clustered in the western portion of Highland. Active hazardous waste cleanup sites can be seen in **Figure 8**.

WHO

Although it is not good for anyone to be exposed to hazardous waste near their place of residence, people more vulnerable to toxic chemicals include infants and children. Infants and children have a greater pound-for-pound exposure, and less ability to detoxify and excrete these chemical toxins. Additionally, older adults and those with pre-existing conditions might be more vulnerable to toxic chemicals due to compromised immune systems.[22] Highland's DACs, which house the majority of cleanup sites, have considerably more children, at 9.18% of their population under 5, whereas non-DACs only have 5.85% of their population under 5.[23]

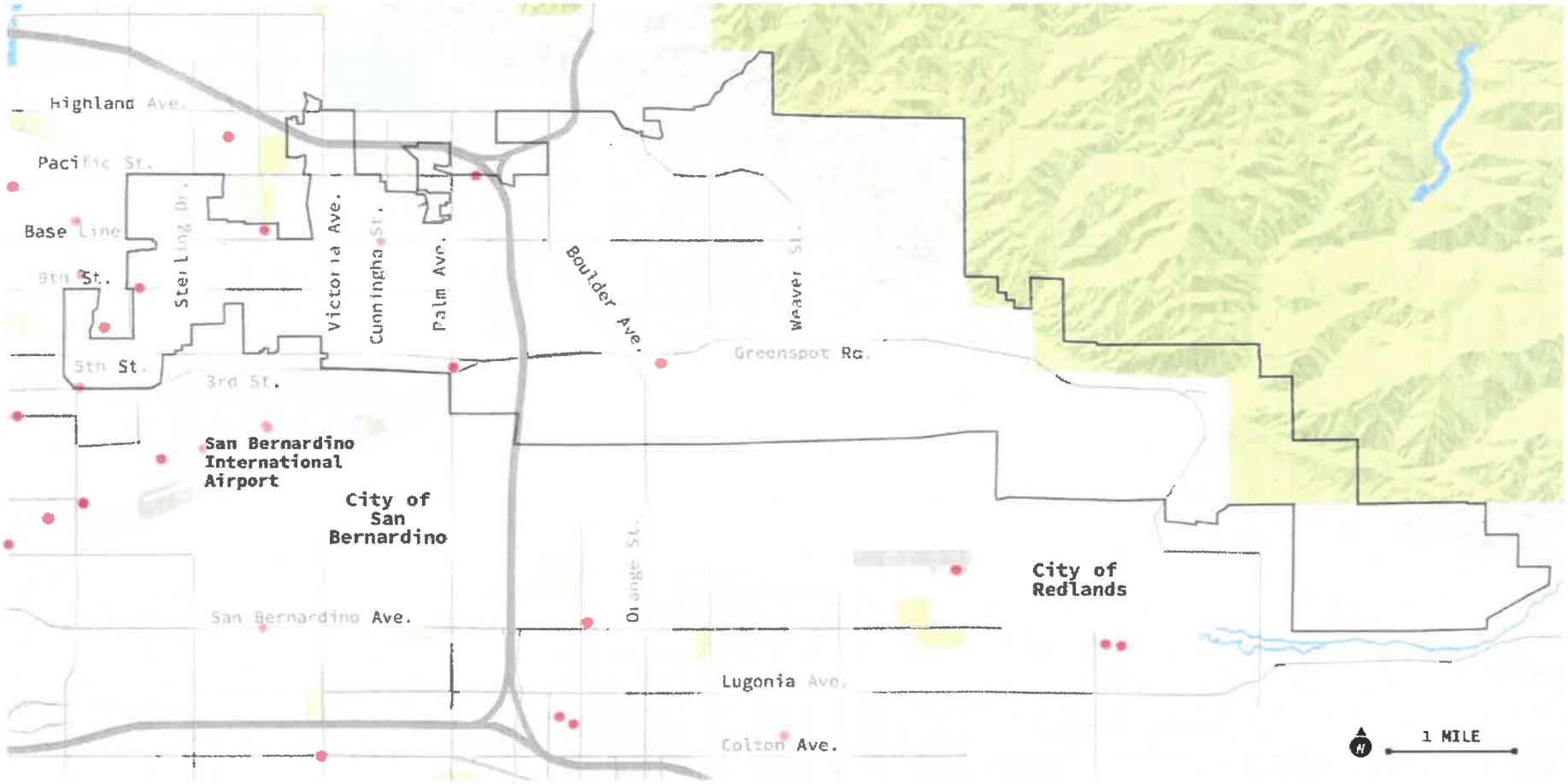
20 American Lung Association. 2020. California State of the Air. Accessed August 6, 2020. http://www.stateofheair.org/city-rankings/states/california/.

21 California Department of Toxic Substance Control. "EnviroStor." 2018. https://www.envirostor.dtsc.ca.gov/public/data_download.

22 U.S. Environmental Protection Agency. 2020. "Exposure Assessment Tools by Lifestages and Populations - Highly Exposed or Other Susceptible Population Groups." April 29, 2020. Accessed August 19, 2020. https://www.epa.gov/expobox/exposure-assessment-tools-lifestages-and-populations-highly-exposed-or-other-susceptible.

23 California Office of Environment Health Hazard Assessment. 2020. "CalEnviroScreen." Accessed July 9, 2020. https://oehha.ca.gov/calenviroscreen.

Figure 8 Hazardous Waste Cleanup Sites



Source: California Department of Toxic Substance Control. "EnviroStor". 2018. https://www.envirostor.dtsc.ca.gov/public/-data_download

Airport Land Use Compatibility and Safety

WHAT

Air transportation provides exceptionally fast transportation for residents and goods. This makes it important not only for ease of travel, but also for the local economy.

WHERE

The closest airports to Highland are the Rialto Municipal Airport, Redlands Municipal Airport, and the San Bernardino International Airport. The Rialto Municipal Airport west of Highland and the Redlands Municipal Airport southeast of Highland are general aviation airports. The San Bernardino International Airport, located just outside of Highland's southern boundary, has the capacity to provide regional air traffic for domestic and international service, both commercial and cargo, along with the necessary support facilities for major and smaller airlines. In addition, the Ontario International Airport, located approximately 30 miles west of Highland, serves as the nearest commercial airport providing air carrier and air cargo operations.

WHO

Airports create noise and safety hazards that can be detrimental for residents, businesses, and property owners. The San Bernardino International Airport has an influence area over the western and southern portions of Highland. In addition, the Redlands Municipal Airport's influence area and an area of special compatibility concern is present in the southern portion of Highland. These areas can be seen in **Figure 9**.

HOW

To reduce the noise incompatibility and safety risks associated with airports, the City has used careful land use planning relative to adjacent land. Goal 6.7 of the Public Health, Safety, and Environmental Justice Element and its related policies specifically look to reduce land use types and development intensity and to inform residents of aircraft activities in aircraft potential zones and overflight areas. Airport overlay zones, specified within the Municipal Code, provide greater safety by establishing requirements for land use compatibility reviews within designated areas close to airports.

Extreme Heat

WHAT

Extreme heat is defined as hot days, warm nights, or heat waves that can result in heat-related illness and hospitalization. Extreme heat is measured locally because communities are acclimatized to their historic environment. An extreme heat day is one that is in the hottest 2% of days observed from 1960 through 1990. In Highland, an extreme heat event is a day hotter than 103°F.[24]

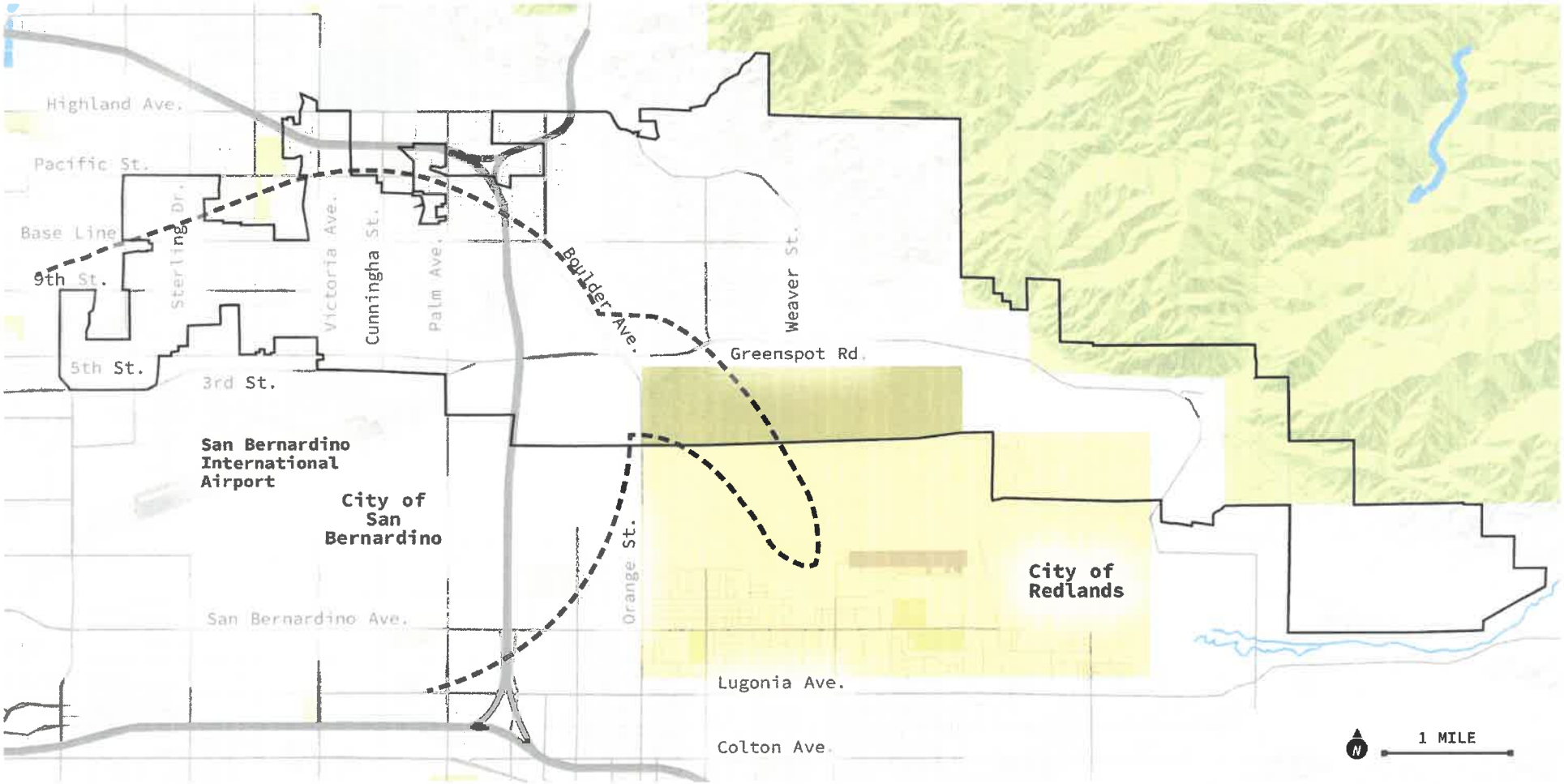
WHEN

Extreme heat typically occurs within Highland during the summer and early fall.[25] Climate change is expected to increase the average temperature year-round, including the frequency of extreme heat days. Historically, Highland has had four extreme heat days per year; it is projected to experience 28 extreme

24 Cal-Adapt. 2020. Accessed July 30, 2020. https://cal-adapt.org/tools/extreme-heat/.

25 Hall, A., N. Berg, and K. Reich. 2018. Los Angeles Summary Report. California's Fourth Climate Change Assessment. University of California, Los Angeles. Publication number: SUM-CCCA4-2018-007.

Figure 9 Airport Influence Areas



San Bernardino Airport Influence Area

Redlands Municipal Airport Influence Area

Area of Special Compatibility Concern

Source: City of Highland

heat days per year by 2050. Historically, heat waves typically last 2.2 days, but they are projected to increase to 5.8 days between 2020 and 2050.[26]

WHERE

Heat waves and extreme heat days are exacerbated by the urban heat island effect. The urban heat island effect occurs when dark urban surfaces, such as roofs and roads, absorb heat and slowly release the heat over time. At night these surfaces slowly transfer heat to the air, creating warm nights, which do not allow people to cool off, making heat waves more dangerous.

The urban heat island effect inflates average annual urban air temperatures 1.8°F–5.4°F warmer than other areas. Heat islands also increase energy demand for air conditioning. The urban heat island effect is visualized in **Figure 10**.

Due to the role of dark urban surfaces and tree cover, the ambient temperature and experience of heat can change within one city block, making it difficult to accurately map communities in Highland that experience greater exposure to the urban heat island effect. In general, residential areas with larger lots, yard area, and trees tend to be cooler than commercial areas with less shade and greenspace.

WHO

People can be adversely affected by extreme heat if they have existing health conditions or spend increased time outdoors working, commuting, or playing. People who depend on walking, biking, or transit to get around; older adults; and young children are at risk for heat stroke. Specifically, residents of DACs are less likely to own a car and are more likely to walk, bike, or take public transportation to work. This means they often cannot avoid time outdoors during heat waves when doing important daily errands. Additionally, households in Highland's DACs also have lower incomes and may not have access to air conditioning or may not be able to afford increased air conditioning during heat waves.

HOW

There are many cooling centers across Highland, including the library, senior center, YMCA, and places of worship. Cooling centers are free spaces where people can go and access air conditioning. All but two of these cooling centers are located west of Foothill Freeway, closer to or within DACs, which, as noted above, are more at risk from extreme heat.

EMERGENCY EVENTS

Emergency events are natural hazards that happen suddenly and often cause evacuation or shelter-in-place orders. Emergency hazards cannot be precisely predicted, but hazard zones, developed by studying past events and landcover and topography, can show where hazards are likely to occur in the future. Both flooding events and wildfires are forecasted to increase in intensity and frequency between 2020 and 2050 as a result of climate change. This may mean that hazards will spread beyond their previous zones, and that large events that only occurred once in the 20th century will occur multiple times before 2050.[27]

26 Cal-Adapt. 2020. Accessed July 30, 2020. https://cal-adapt.org/tools/extreme-heat/.

27 Hall, A., N. Berg, and K. Reich. 2018. Los Angeles Summary Report. California's Fourth Climate Change Assessment. University of California, Los Angeles. Publication number: SUM-CCCA4-2018-007.

Figure 10 Urban Heat Island Effect

Greenery and the urban heat island effect

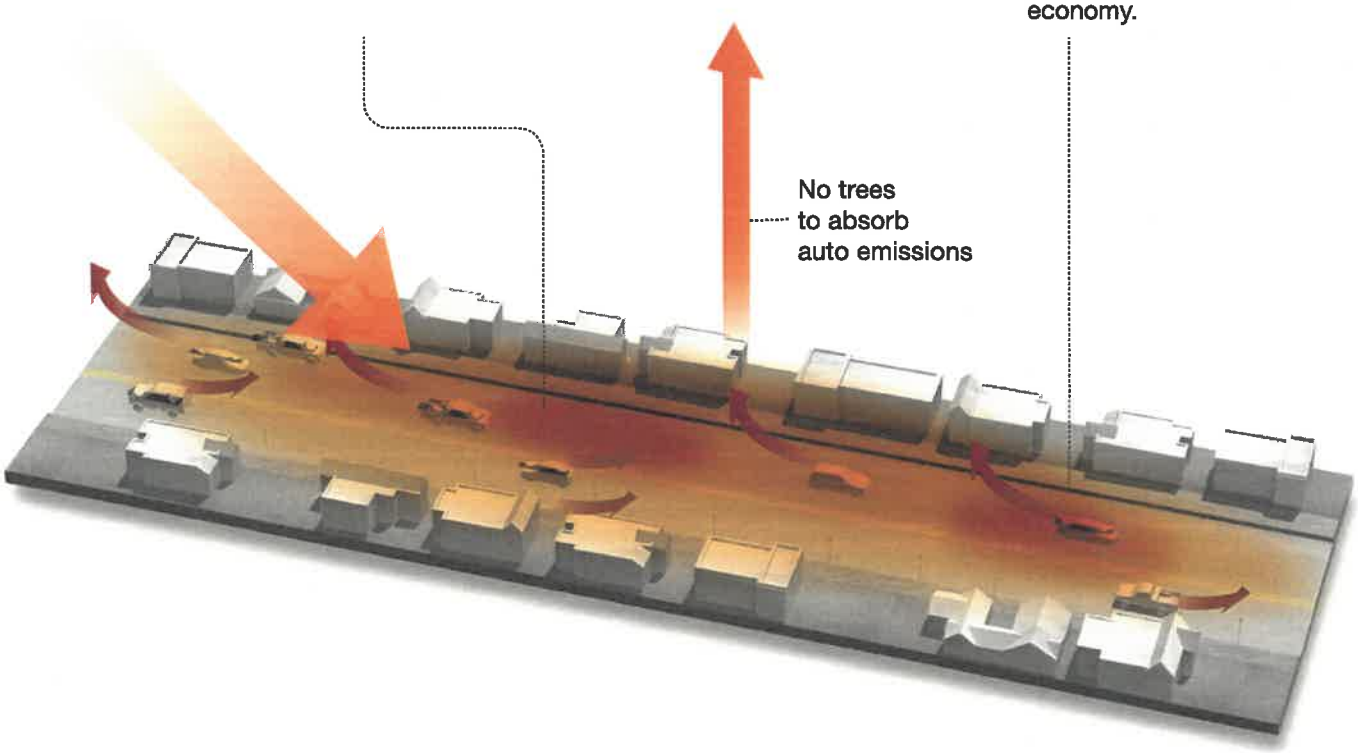
No Greenery

1 Solar energy is emitted by the sun.

2 Heat is absorbed and retained by dark, urban surfaces.

3 Heat is slowly emitted throughout the day and evening, increasing temperatures.

4 Increased temperatures discourage pedestrian traffic, negatively impacting local economy.



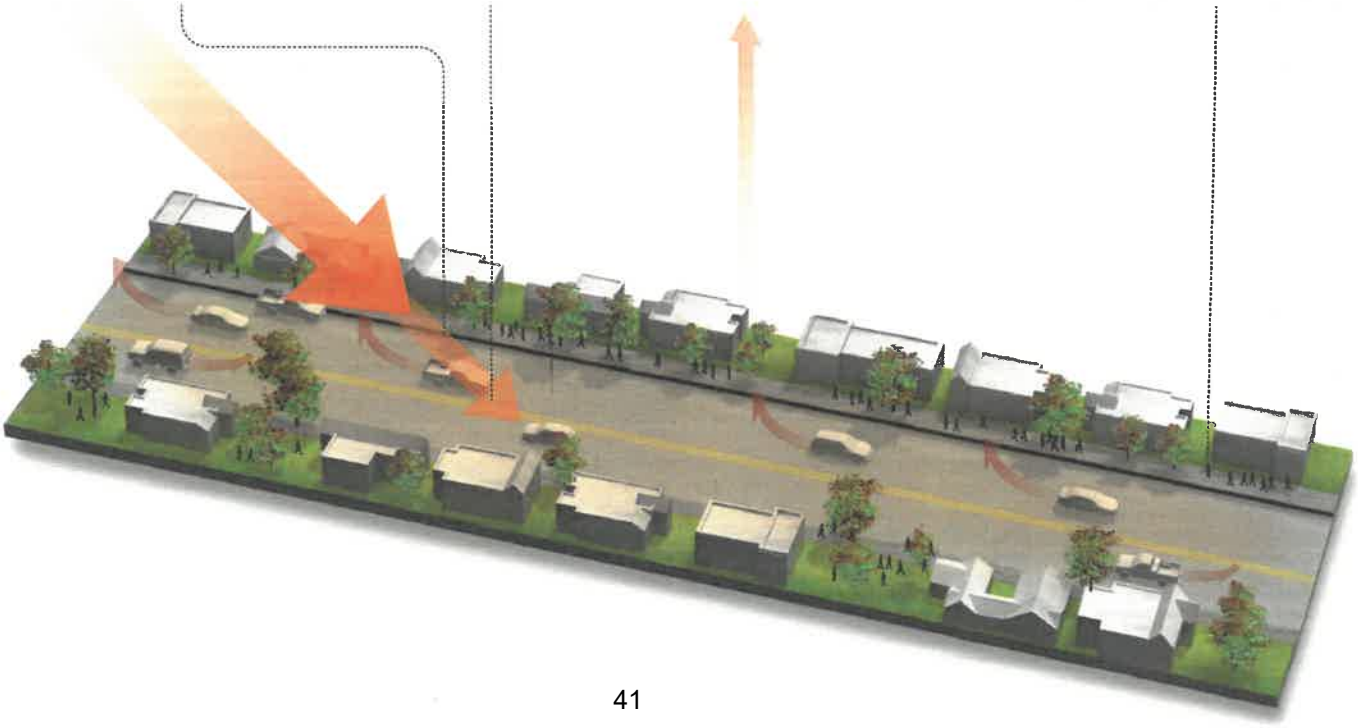
With Greenery

1 Solar energy emitted by the sun partially absorbed by trees.

2 Light surfaces absorb, retain less heat.

3 Auto emissions partially absorbed by trees.

4 Cleaner air, cooler weather creates a pedestrian-friendly environment positively impacting local businesses.



Flooding

WHAT

Flooding is caused by increased rain causing rivers and urban drainage basins to fill and overflow. Increased flooding occurs when rain occurs over a shorter period of time, even if there is less overall rain, because the soil does not have enough time to absorb the rainfall. Flooding most often occurs in low-lying areas near creeks and other waterways; this area adjacent to a river or stream is the floodplain. Generally, the floodplain most often refers to the area that would be inundated by a 100-year flood, or the flood that has a 1% chance of occurring in any year. The 500-year floodplain is the area that has a 0.2% chance of being flooded in any year. These estimates are based on historic observations, but these flood events are projected to happen more frequently as climate change causes more intense rainfall and increased **urbanization** covers natural areas with **impervious surfaces**, which cause even small amounts of rain to run off and potentially cause flooding.

URBANIZATION

Urbanization is an increased density of people becoming concentrated in small areas, creating cities. These dense areas are called urban areas, and historically have large amounts of gray infrastructure.

IMPERVIOUS SURFACES

Impervious surfaces, such as asphalt and concrete, hinder or completely prevent natural runoff of water and can cause it to pool in unwanted places.

WHEN

Flooding in Highland generally occurs in the winter months when the region receives the most rain, but climate change may extend the flood hazard season.[28] Climate change is also predicted to increase the number of annual extreme rain events, when large amounts of rain falls over a short period of time. These events often do not allow the rain to soak into the ground and they overwhelm stormwater infrastructure.

WHERE

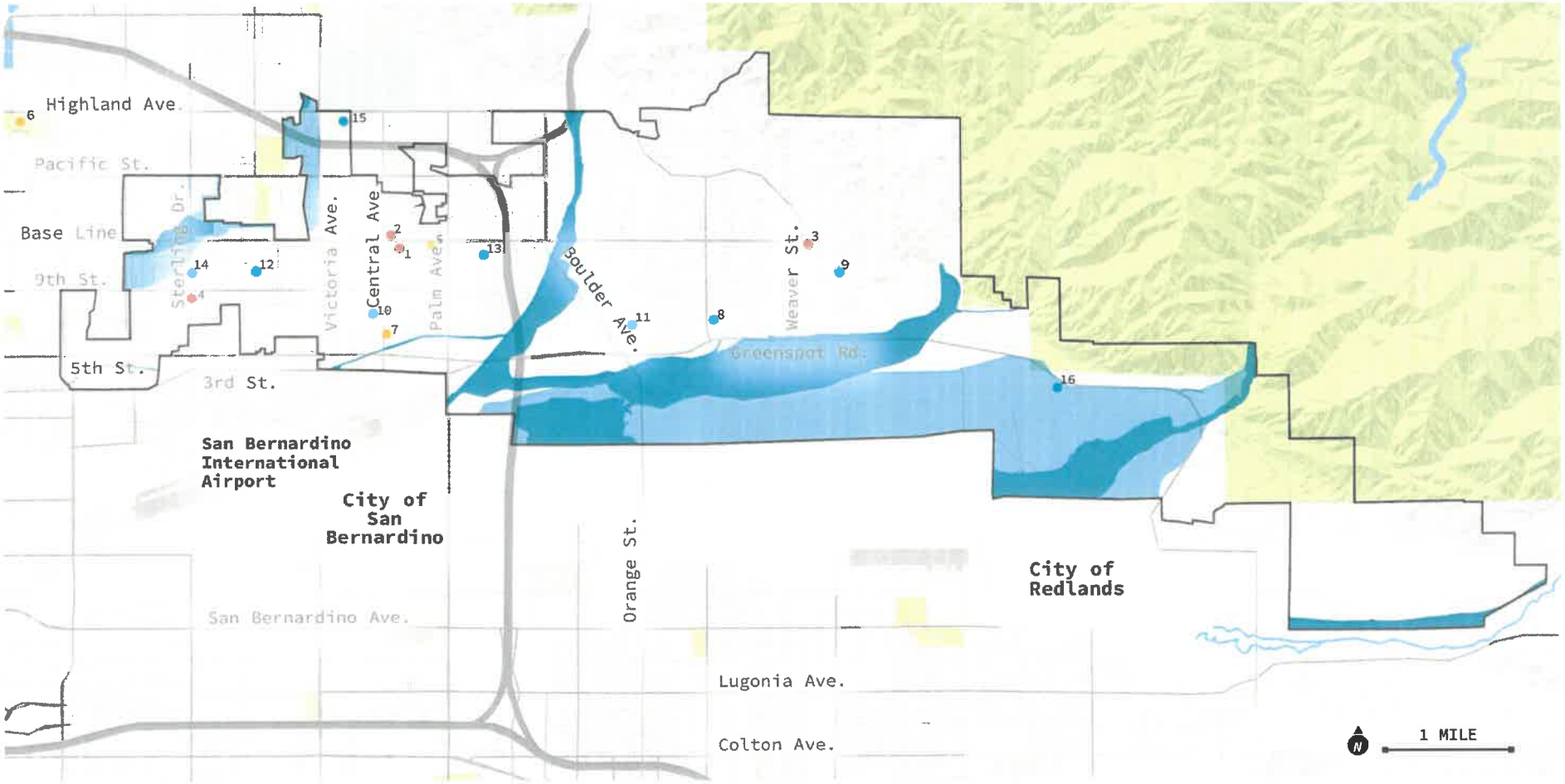
As shown in **Figure 11**, flood risk is dispersed across Highland but is most centralized in the southern portion of east Highlands, just south of Greenspot Road. This area has a 1% chance of flooding annually, which is also known as a 100-year flood zone. Much of the area south of Greenspot Road has been left as open space. This aids in allowing for natural drainage during extreme rain events.

WHO

People can be more vulnerable to flooding due to factors such as social isolation, language barriers, or physical disabilities, thereby causing evacuation challenges during a flood event. Additionally, low-income renters often face increased challenges in recovering from flood events because they are less likely to have renter's insurance and often facehigher levels of displacement and homelessness if their residence isdamaged during a flood event. Residents within Highland's DACs are

28 Hall, A., N. Berg, and K. Reich. 2018. Los Angeles Summary Report. California's Fourth Climate Change Assessment. University of California, Los Angeles. Publication number: SUM-CCCA4-2018-007.

Figure 11 Flood Risk



100-year Flood Zone

500-year Flood Zone

Source: Federal Emergency Management Agency (FEMA). 2020. Flood Hazard Layer Areas. https://www.floodmaps.fema.gov/NFHL/status.shtml

Emergency Response Facilities

1. Highland Police Station & EOC
2. Highland Fire Station
3. East Highland Fire Station
4. West Highland Fire Station

Critical Facilities

5. City Hall
6. Jerry Lewis Community Center
7. Sam J. Racadio Branch Library

Non-Critical Public Facilities

8. Arroyo Verde Elementary
9. Cram Elementary
10. Cypress Elementary
11. Highland Grove Elementary/Beattie Middle School
12. Lankershim Elementary
13. Thompson Elementary
14. Warm Springs Elementary
15. Real Journey Entrepreneur Jr High & High School
16. East Valley Water District Corporate Center

more likely to be renters than the rest of Highland residents, and are therefore more vulnerable to flooding. More than one-third of the renters in Highland's DACs spend more than one-half of their income on rent, meaning these community members might have difficulty recovering from a flood event.[29]

HOW

The City addresses flooding and stormwater within the Public Facilities Element of the General Plan. For example, Goal 4.4 of the Public Facilities Element is to "Maintain an effective drainage system that protects people and property from overflows and flood disasters." Related policies involve improving deficiencies in the City's drainage system, and minimizing impervious surfaces associated with new development.

Geologic Hazards

Geologic hazards are natural geologic processes with the ability to impact life, health, and property. Highland is vulnerable to geologic and seismic hazards that include landslides and slope instability, earthquakes, and liquefaction.

Landslides/Slope Instability

Landslides are a geological hazard caused by disturbances in the natural stability of a slope. Different types of landslides vary in speed, as do the possible effects of the landslide. Although slower-moving landslides can cause gradual damage to structures, rapid landslides, such as mudslides, can quickly destroy property and become life-threatening. This means that landslides must be planned for on multiple time scales regarding response times.

WHEN

Landslides can be triggered by numerous, often interconnected, factors, such as droughts, heavy rain, soil erosion, earthquakes, and/or human activities. For example, surface runoff may be intensified by paved roads and parking lots in urban areas due to the surface material's inability to naturally drain. This can cause a heavier load to be placed on potential landslide zones and amplifies risk of a landslide event. Landslides are often unpredictable and pose a threat because of their capacity to occur without warning and quickly destroy structures and threaten lives.

WHERE

Historically, significant landslides have occurred in the San Bernardino region and have potential to occur in portions of Highland.[30] Areas at high risk of landslides include the northern and eastern areas due to their proximity to steep slopes and the rock strength in these areas. These factors, compounded with the proximity to the San Andreas Fault and the risk of fire in these areas, create an even higher risk of landslide. **Figure 12** displays the areas in Highland at risk of a landslide.

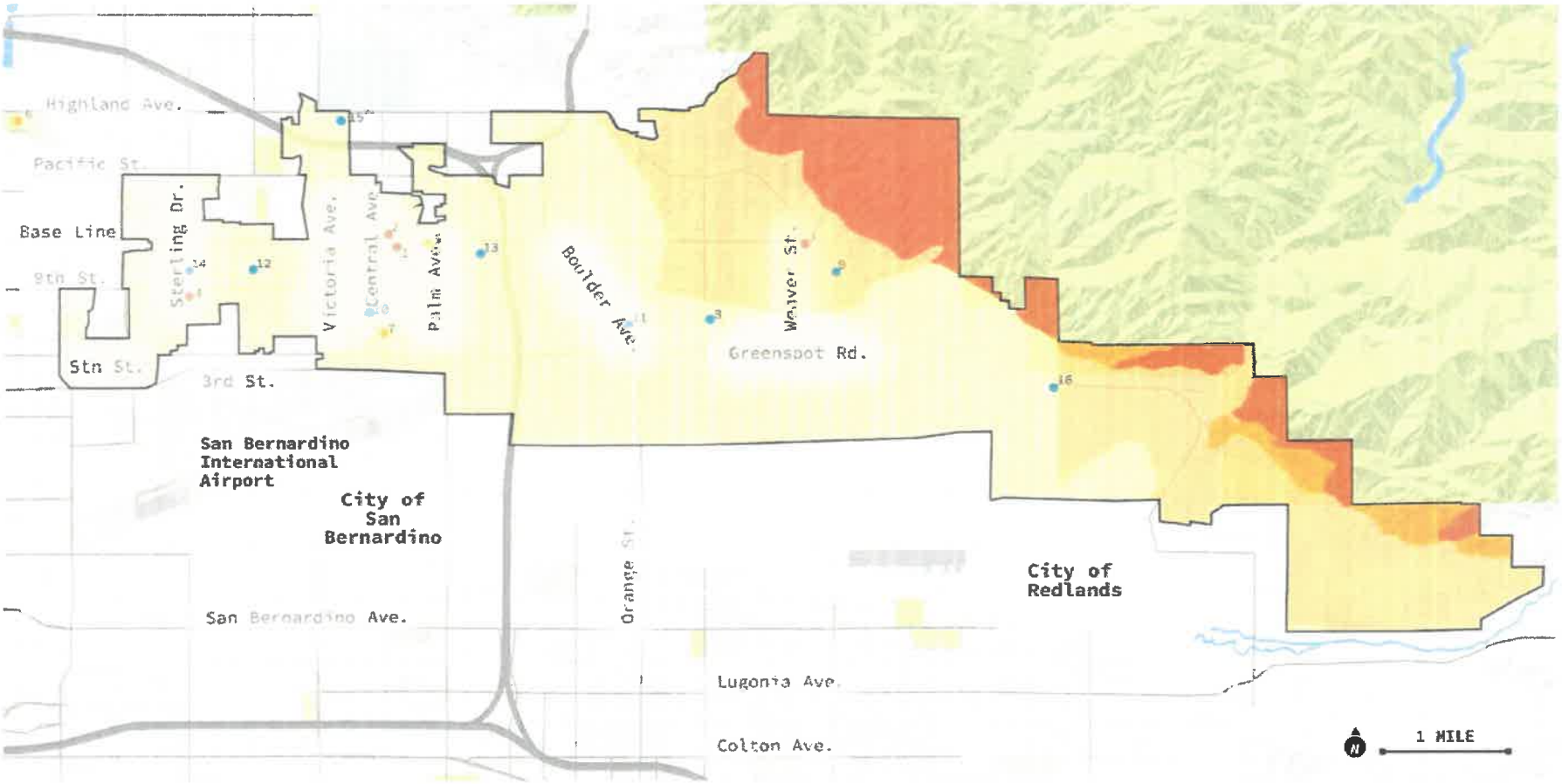
WHO

Those most vulnerable to landslides are people who have difficulty responding quickly to protect themselves. This may include members of the community who are socially isolated due to language barriers, or those unable to quickly respond to changing environments due to things like physical disabilities.

29 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

30 San Bernardino County. 2017. Multi-Jurisdictional Hazard Mitigation Plan (San Bernardino County). July 13, 2017. Accessed August 6, 2020. http://cms.sbcounty.gov/portals/58/Documents/Emergency_Services/Hazard-Mitigation-Plan.pdf.

Figure 12 Landslides



Source: Dudek

In addition, those with difficulty paying for repairs, should they be necessary, are more vulnerable to landslides. In Highland, most of the landslide susceptibility areas are in non-DACs within City limits. Overall, non-DAC residents are more equipped to pay for repairs to damages caused by landslides.

HOW

Landslides and slope instability are addressed through proper engineering and infrastructure improvements. The City enforces hillside development guidelines and structural design measures during development proposals.

EARTHQUAKES AND SEISMIC HAZARDS

WHAT

Earthquakes are sudden ground-shaking events caused by the release of pressure in the earth. This quick release of pressure poses a safety risk to people and structures due to the unpredictability of both magnitude and timing.

WHEN

Earthquakes can occur without warning. There are no U.S. Geological Survey–approved methods of predicting a major earthquake before the event occurs, and therefore earthquake events pose a major threat to structures and people. It is currently only possible to calculate the probability that a major earthquake event will occur in an area in a given number of years, making long-term earthquake forecasts unreliable and often incorrect.

WHERE

Highland encompasses north and south branches of the San Andreas Fault. As recently as 1857, the south branch of the San Andreas Fault had an 8.0-plus magnitude earthquake. This fault is capable of generating up to an 8.3 magnitude earthquake, which would cause significant ground shaking and have the potential for surface ruptures and ground failures within City limits.

Another major nearby fault is the San Jacinto Fault, which is approximately 4.5 miles southwest of Highland. This fault is capable of generating an 8.5 magnitude earthquake, which would cause significant ground shaking.

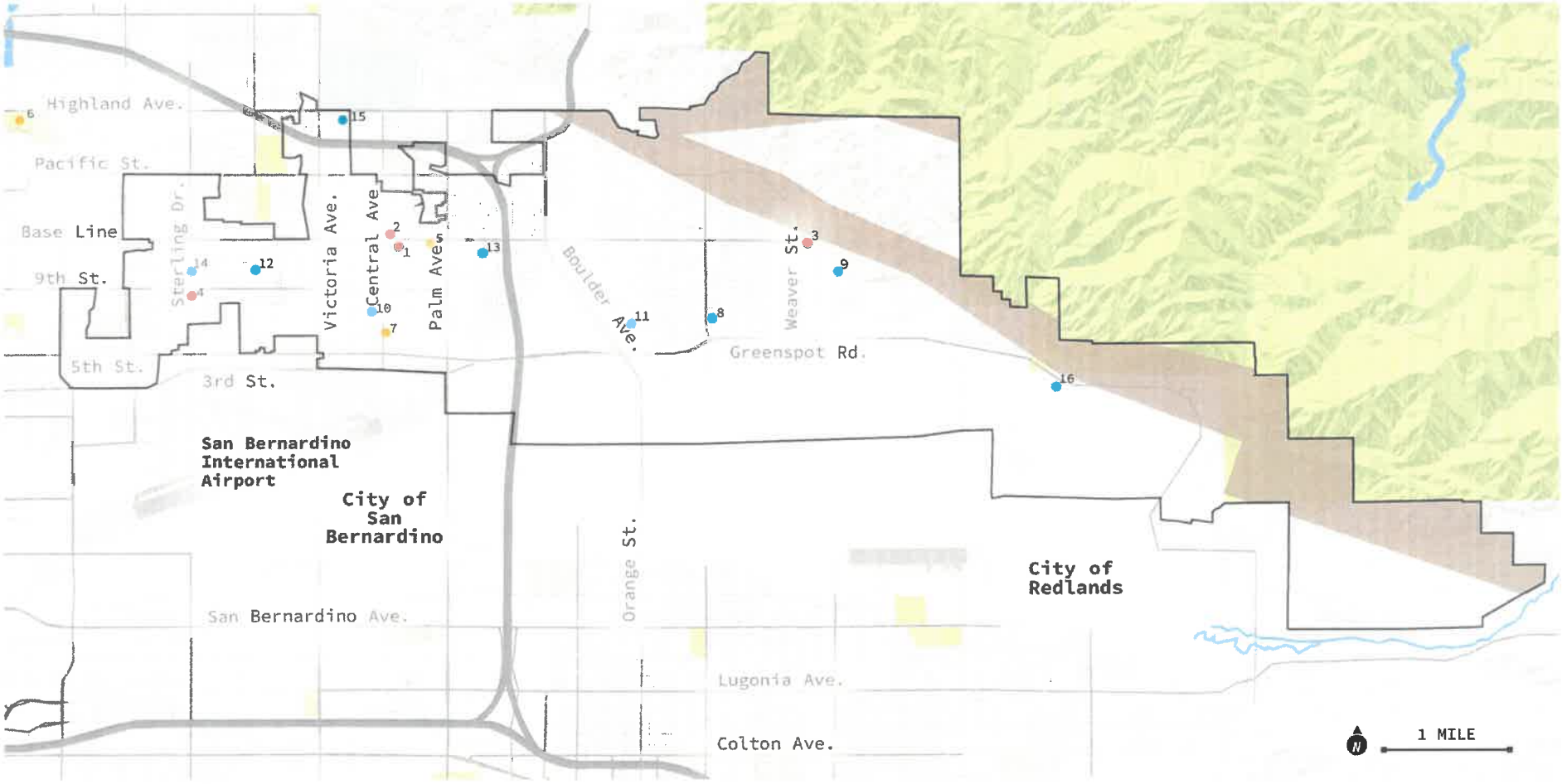
Active faults are identified by the U.S. Department of Conservation, and a zone around them is disallowed from construction of new developments to prevent repetitive loss of structures and threats to safety of occupants. The unsafe areas around active faults are regulatory zones referred to as Alquist-Priolo Earthquake Fault Zones. The Alquist-Priolo Special Studies Zone Act (1994) defines an active fault as one that has ruptured in the last 11,000 years, and provides mapping resources for the public to strengthen awareness and prevent unsafe construction in these areas.[31] As can be seen in **Figure 13**, there are Alquist-Priolo Earthquake Fault Zones that cross through the northeastern portion of Highland.

WHO

Residents located in fault zones are at higher risk of their homes being damaged by earthquakes. Additionally, groups vulnerable to earthquakes are those that have difficulty responding to the impacts of

31 U.S. Department of Conservation. 2019. "Alquist-Priolo Earthquake Fault Zones." https://www.conservation.ca.gov/cgs/alquist-priolo.

Figure 13 Alquist-Priolo Earthquake Fault Zones



Alquist-Priolo Earthquake Fault Zones

Source: California Department of Conservation. 2015. Regulatory Maps. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps

Emergency Response Facilities

1. Highland Police Station & EOC
2. Highland Fire Station
3. East Highland Fire Station
4. West Highland Fire Station

Critical Facilities

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6. Jerry Lewis Community Center
7. Sam J. Racadio Branch Library

Non-Critical Public Facilities

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the earthquake. For example, lower-income homeowners, especially those who are housing burdened, may have difficulty paying for repairs and may not have earthquake insurance.

Peakload Water Requirements

The City is a part of the East Valley Water District (EVWD). EVWD's current water demand is 31,609 acre-feet per year (which is equal to an average day demand of 28.2 million gallons per day). Future water demands are expected to increase over time, reaching 36,203 acre-feet per year (32.3 million gallons per day) by buildout in 2040. Demands are typically evaluated using three primary scenarios: average day demand, maximum day demand, and peak-hour demand. Using 2004 through 2008 water consumption and production records, the 2015 San Bernardino Valley Regional Urban Water Management Plan found the average day demand for EVWD to be 209 gallons per-capita per day.[32]

The EVWD's existing water supply comes from a combination of groundwater, surface water, and the State Water Project. It is important to identify peak-load water supply when discussing seismic risks because large seismic events have the potential to destroy or incapacitate the normal water supply. If a local earthquake occurs, local water piping would be at risk. Earthquakes farther away could also impact the State Water Project.

It is also important to mention trends surrounding water supply. The State Water Project provides 23% of EVWD's water, 76% of the water supply is from local groundwater wells, and 1% of the water is from the Santa Ana River.[33] With climate change projected to increase the frequency and severity of droughts, it is likely that water supplied by these sources will be reduced.[34] Additionally, the vulnerability of levees protecting the State Water Project must be considered.

State Water Project water is more expensive than local water, and thus is used more sparingly than local sources. But State Water Project water is available for use during emergencies and drought situations, providing security for the water district and the City. In the event of a loss of water sources, EVWD has a storage capacity of 27.6 million gallons, which would supply potable water for 2 to 3 days.[35] EVWD also is a participant in ERNIE, a mutual aid network within San Bernardino and Riverside Counties. Additional measures are in place to provide safe water to the public and an efficient repair of damages.

In addition to these sources, EVWD is working to make the water supply more sustainable. The Sterling Natural Resource Center Project is a new wastewater treatment facility that will treat 8 million gallons of water per day to be recharged back into the groundwater basin for domestic reuse.[36] This amount will be expandable up to 10 million gallons per day. The project is expected to be completed by March 2022. Water supply needs for future development and fire suppression will also be addressed in the California Fire Code and the City Municipal Code with amendments.

32 Water Systems Consulting. 2016. 2015 San Bernardino Valley Regional Urban Water Management Plan. June 2016. Accessed August 7, 2020. http://www.sbvmwd.com/home/showdocument?id=4196.

33 East Valley Water District. 2018. "Groundwater Resources." Accessed August 6, 2020. https://www.eastvalley.org/121/Groundwater-Resources.

34 Hall, A., N. Berg, and K. Reich. 2018. Los Angeles Summary Report. California's Fourth Climate Change Assessment. University of California, Los Angeles. Publication number: SUM-CCCA4-2018-007.

35 Water Systems Consulting. 2016. 2015 San Bernardino Valley Regional Urban Water Management Plan. June 2016. Accessed August 7, 2020. http://www.sbvmwd.com/home/showdocument?id=4196.

36 East Valley Water District. n.d. "Capital Improvement Program." https://www.eastvalley.org/118/Capital-Projects.

Liquefaction

WHAT

Liquefaction occurs when soil is saturated with water and is subject to a destabilizing force, such as an earthquake, resulting in the soil losing the ability to support its own weight. This event causes the soil to behave as a fluid, potentially destroying structures built upon it and threatening the safety of people in a liquefaction zone.

WHEN

Liquefaction generally occurs during significant earthquake activity and has been a major cause of earthquake damage in Southern California. The duration and magnitude of an earthquake are important factors in causing liquefaction; ground-shaking events continually build pressure in saturated soil, and if that pressure exceeds the bond between soil materials, it will collapse and behave as a liquid. Soils that are saturated and fine-grained, such as silt or sand, can be at risk of liquefaction due to the decreased amount of pressure required to destroy the bond in fine soil material.

WHERE

Liquefaction may damage structures on saturated, granular soils such as silt or sand, during an earthquake. These geologic conditions are typical in valley regions within Highland. Areas at risk of liquefaction due to soil composition and heightened exposure to runoff cover nearly all of southeastern Highland, as well as western Highland. A map of these liquefaction zones can be seen in **Figure 14**.

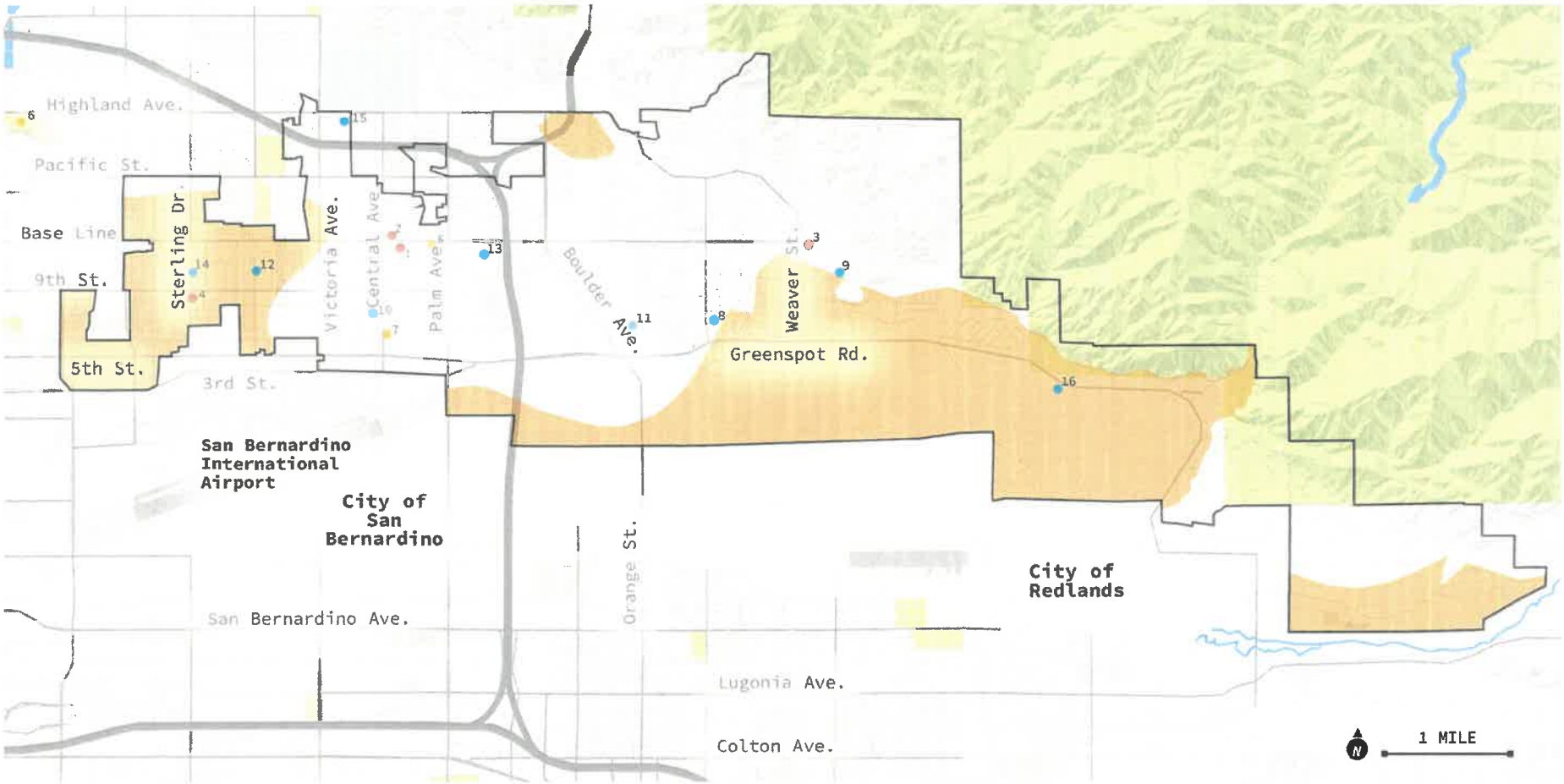
WHO

Older adults living alone and people with disabilities may be more prone to evacuation challenges during a liquefaction event.

HOW

To reduce the chance of liquefaction causing damages to structures or injuries to residents, the City has developed a goal, and associated policies, within its General Plan. Goal 6.1 of the Public Health, Safety, and Environmental Justice Element focuses on minimizing disruptions to the social, economic, and environmental welfare of residents caused by seismic and geologic activities. A development review policy specifically related to liquefaction risk and land use is one of the policies related to Goal 6.1.

Figure 14 Liquefaction



High Risk Liquefaction Zones

Source: OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Accessed January 2021. https://oehha.ca.gov/calenviro-screen/report/calenviroscreen-30

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Wildfire

WHAT

Wildfires are most commonly caused by humans and lightning. Human-caused fires result from campfires left unattended, the burning of debris, electrical equipment use and malfunctions, negligently discarded cigarettes, and intentional acts of arson.[37] Wildfires are known to spread more quickly on dry, windy days, and move more easily in an uphill direction, particularly in areas with a higher density of vegetation. Wildfires are a natural and important part of the ecosystem, but can become more intense and dangerous as a result of climate change and land management.

WHEN

Small fires should occur regularly in the San Bernardino region's natural chaparral landscape, but years of fire suppression can create a dangerous buildup of fuel. Climate change is likely to intensify the fall fire season by extending the dry season further into the Santa Ana wind season, which drives most wildfires in the San Bernardino region.[38] Fires in the area that threaten Highland are not new or uncommon. In 2003 the Old Fire burned more than 90,000 acres of land in and around Highland, destroyed nearly 1,000 homes, and took six lives. Five other fires have occurred in Highland from 2008 to 2018 (see **Figure 15**).

WHERE

Most of northern and eastern Highland is built in fire-risk areas due to the proximity to forest land northand east of the City limits. Wildfires can start outside Highland and spread into it, or create dangerous airpollution by blowing ash into Highland. These natural lands east and north of Highland pose the greatest riskto Highland residents and structures. The most northeastern portions of Highland are located in very high fire risk areas, as well as everything east of Weaver Street and north of Greenspot Road. Land use management in these very high fire hazard severity zones is important to ensure safety and resiliency for community members. Highland's Land Use Element specifies the majority of this space as planned development, and portions as agriculture/equestrian, low-density residential, and open space, with one parcel listed as medium-density residential. There is also a radio broadcasting station located in the very high fire hazard severity zone. Additionally, an electric transmission line (between 33 and 92 kilovolts) cuts through a portion of Highland within the very high fire hazard severity zone along Greenspot Road and Morton Front Line.[39] There are also a number of roads within Highland's very high fire hazard severity zones. Highland Avenue is the only arterial that runs through this zone, and the Steve Faris Memorial Highway also has a small portion within City limits that is in the very high fire hazard severity zone. A number of local roads are within this zone. The fire hazard zones can be seen in **Figure 16**.

WHO

Similar to flooding, certain members of the community may be more vulnerable to wildfires due to social isolation as a result of language barriers, or physical disabilities leading to difficulty evacuating during a wildfire. An inability to quickly evacuate can also be caused by a lack of access to a car, which is more prevalent in DACs.

37 National Park Service. 2021. "Wildfire Causes and Evaluations." https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm#:~:text=Nearly%2085%20percent*%20of%20wildland,and%20intentional%20acts%20of%20arson.&text=Lightning%20is%20one%20of%20the%20two%20natural%20-causes%20of%20fires.

38 Hall, Alex, Neil Berg, and Katharine Reich (University of California, Los Angeles). 2018. Los Angeles Summary Report. California's Fourth Climate Change Assessment. Publication number: SUM-CCCA4-2018-007.

39 California Energy Commission. 2020. "Electric Transmission Lines." May 11, 2020. https://map.dfg.ca.gov/metadata/ds1198.html.

Low-income renters may face increased challenges recovering from fire events because they are less likely to have renter's insurance and therefore may face higher levels of displacement and homelessness if their residence is damaged. DAC residents in Highland are much more likely to be renters than other residents, and are therefore more vulnerable to fires. More than one-third of the renters in Highland's DACs spend more than one-half of their income on rent, meaning these community members might have difficulty recovering from a wildfire.

HOW

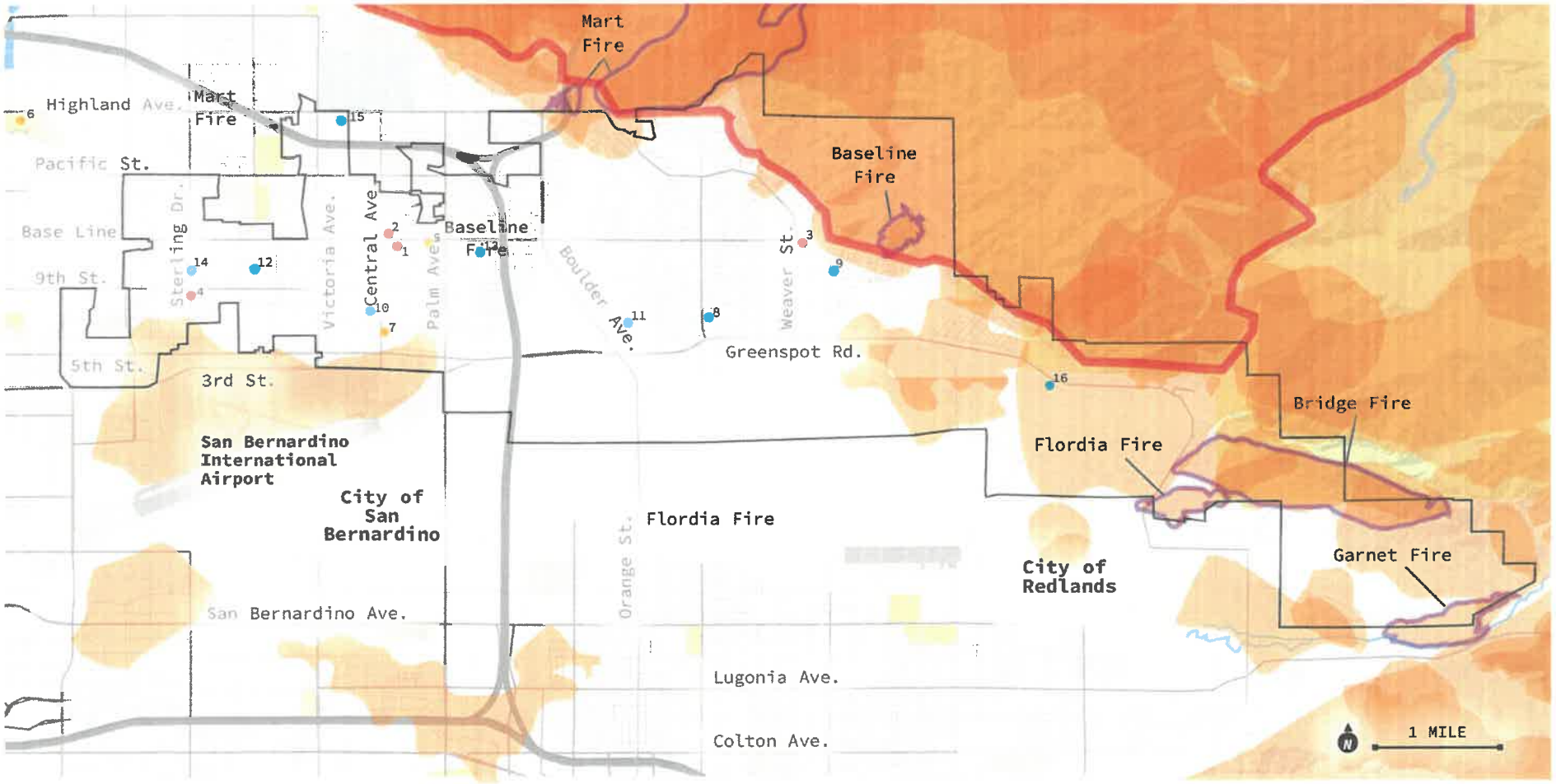
To protect residents and their property from wildfire, the City uses multiple policies within its General Plan. These policies include development review within fire hazard areas, fire safety standards within the Municipal Code, education on wildfire, and enforcement of standards related to emergency water service and fire sprinklers. The City has adopted the 2019 California Building Code within the Municipal Code, as well as the California Fire Code. These codes require home hardening and defensible space in accordance with state standards within very high fire hazard severity zones. The City does not have a Local Hazard Mitigation Plan, which is another form of hazard planning document. San Bernardino County developed a Multi-Jurisdictional Hazard Mitigation Plan, but this plan does not cover the City of Highland.

Another way that fire hazards are often planned for and mitigated is through community organizations called fire safe councils. Highland does not have a fire safe council, but there are three within 10 miles of Highland to the north and east. There is also the Inland Empire Fire Safe Alliance, which acts as a way to establish efficient, consistent, collaborative actions and messaging among the different fire safe councils, jurisdictions, and organizational partners.[40] Community Wildfire Protection Plans (CWPPs) are a planning document used by Fire Safe Councils to plan for fire. The nearest CWPP covers land directly north of Highland in the San Bernardino Mountains and was developed by the Mountain Rim Fire Safe Council. There are several pre-fire measures discussed within the California Department of Forestry and Fire Protection's (CAL FIRE) Strategic Fire Plan for the San Bernardino Unit, including fire prevention measures, engineering and structural measures, educational efforts, and vegetation management programs.[41] The Fenner Canyon Fire Crew provides maintenance services that reduce fire risk to general City facilities. No fire breaks are within City limits, but CAL FIRE's fire crews have created fire breaks elsewhere in San Bernardino County.

40 Mountain Rim Fire Safe Council. 2020. "Inland Empire Fire Safe Alliance." https://www.mountainrimfsc.org/inland-empire-fire-safe-alliance.

41 California Department of Forestry and Fire Protection. 2020. 2020/2021 Strategic Fire Plan for the San Bernardino Unit. May 6, 2020. https://osfm.fire.ca.gov/media/ixcfaefc/2020-bdu-fire-plan.pdf.

Figure 15 Historic Wildfires



Recent Fires (2008-2018)

Old Fire

Frequency of Past Fires

Less — More

Emergency Response Facilities

1. Highland Police Station & EOC
2. Highland Fire Station
3. East Highland Fire Station
4. West Highland Fire Station

Critical Facilities

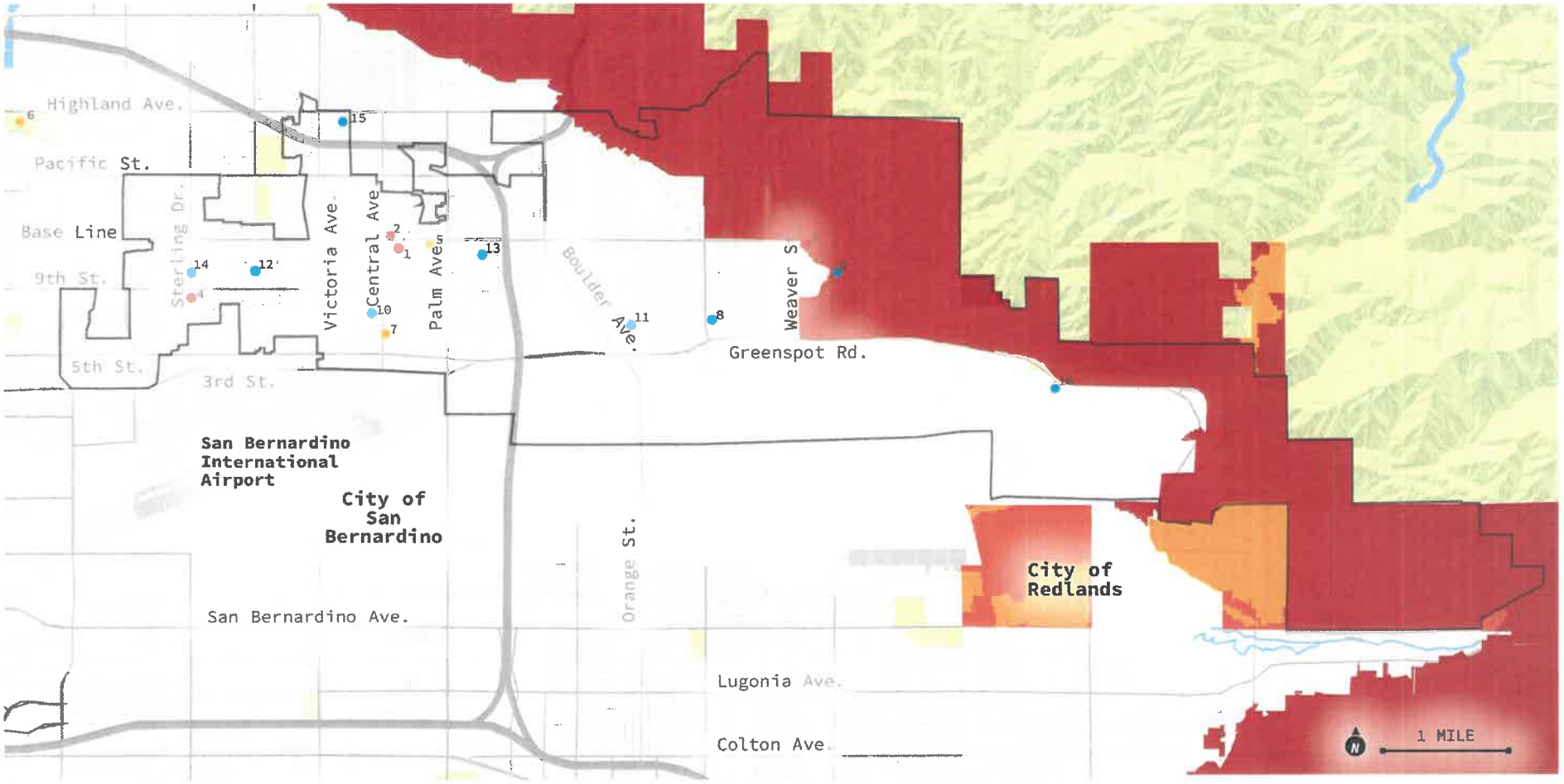
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16. East Valley Water District Corporate Center

Source: Cal FIRE. 2019. Fire Perimeters. https://frap.fire.ca.gov/frap-projects/-fire-perimeters/

Figure 16 Wildfire Hazard Severity Zones



Very High Wildfire Hazard Severity Zone

High Wildfire Hazard Severity Zone

Moderate High Wildfire Hazard Severity Zone

Source: Source: Cal FIRE. 2020. California Fire Hazard Severity Zone Viewer. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414

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EMERGENCY PREPARATION AND RESPONSE

Emergency preparation and response are important components in ensuring residents are ready for hazards and first responders can adequately serve residents in the event of a hazard.

The City of Highland's fire department serves the City with three fire stations. Divisions 2 and 3 of CAL FIRE's San Bernardino County Fire Protection District provide fire protection and emergency medical services in the region surrounding Highland, including the wildland urban interface to the east and north, and the City of San Bernardino to the west. CAL FIRE may also provide fire protection and emergency medical services to the City of Highland through a cooperative agreement. All CAL FIRE units participate in annual wildfire training prior to fire season and throughout the year. The San Bernardino County Sheriff's Department provides police and emergency response for the City of Highland. The City also is involved in a Statewide Master Mutual Aid Agreement with the City of San Bernardino, and automatic aid agreements with Redlands, Yucaipa, and the U.S. Forest Service. Additionally, the American Red Cross provides a variety of disaster relief support services.

The City's Municipal Code addresses fire access roads, including maintenance, and states, "Access roads, private roadways, and public roadways shall be provided and maintained in a passable condition at all times. Any obstruction or impedance to reasonable access may be removed by any public safety agency with the expense of such removal to be borne by the owner of the roadway, or in the case of an obstructing vehicle or object, by the owner of said vehicle or object." Similarly, Highland's Circulation Element includes a goal to "Provide a well-maintained roadway system."

To aid in emergency response and evacuation, proper and visible addresses are necessary on streets and buildings. The Municipal Code requires all streets to have noncombustible and reflective street name signs visible at all intersections for new developments. Additionally, according to the California Fire Code, all new structures must provide address identification with illumination during the hours of darkness.

Population impacts on emergency response services are currently evaluated on a project-by-project basis through the development review process.

Emergency Response Facilities

Emergency response facilities are those activated during an emergency and used to respond to hazards. There are three fire stations spread across Highland, as shown in **Table 3-8**, Assets in Highland. The East Highland Fire Station (Fire Station #2) is located within a very high fire hazard severity zone.

CRITICAL FACILITIES

Critical assets are pieces of infrastructure that are important to the regular functioning and emergency response services for a community. These can include important community buildings that are used during a hazard event or are necessary for regular City functioning. These assets need to be protected from hazards to ensure people can evacuate, find shelter, and recover from hazards. Highland has multiple critical assets, including City Hall, the senior center, and the library, as shown in **Table 3-8**. There are no hospitals in Highland, but the Dignity Health Community Hospital of San Bernardino is just west of Highland.

NON-CRITICAL PUBLIC FACILITIES

Non-critical facilities are those that can be used in hazard recovery to gather resources, distribute information, or serve as shelters. These are generally flexible facilities that can be activated and would likely not all be used at once during a hazard event. Non-critical facilities can also serve as cooling facilities that provide air condition during extreme heat events. Highland's non-critical public facilities include Highland's nine schools and the YMCA/community center, as shown in **Table 3-8**.

Table 3-8. Assets in Highland

Asset Type	Asset Name	Relevant Hazards
Emergency Response Facilities	Highland Police Station & EOC	None
	Highland Fire Station (Station 1)	None
	East Highland Fire Station (Station 2)	Wildfire
	West Highland Fire Station (Station 3)	None
Critical Facilities	City Hall	None
	Jerry Lewis Community Center	None
	Sam J. Racadio Branch Library	None
Non-Critical Public Facilities	Arroyo Verde Elementary	None
	Cram Elementary	Wildfire
	Cypress Elementary	None
	Highland Grove Elementary/Beattie Middle School	None
	Lankershim Elementary	None
	Thompson Elementary	None
	Warm Springs Elementary	None
	Real Journey Entrepreneur Jr High & High School	Wildfire
	East Valley Water District Corporate Center	None

Evacuation Routes

In the event of an extreme fire, flood, or other circumstances, evacuation may be necessary. To preserve the lives of Highland residents, it is important to ensure that the routes used for evacuation are unobstructed and in good condition. Depending on the hazard, evacuation routes in Highland may involve a variety of highways and arterials. Interstates and highways that could be used by residents to evacuate the area include Interstates 10, 15, and 215, as well as State Routes 30, 31, 38, 60, 66, and 210. Major east/west roads within Highland that could be used for evacuation include Greenspot Road, Base Line Street, East Highland Avenue, and Pacific Street.

4

FINDINGS

PUBLIC HEALTH AND CHRONIC HAZARDS

Based on the above analysis of each hazard, Highland's public health concernswere categorized into three categories from high to low priority: critical, important,and marginal. This was determined by comparing the relevant **vulnerable populations** and **built environment** to the State. Each public health concern was assessed using unique and relevant vulnerable populations and built-environment factors. Where there was a high proportion of vulnerable peoplein Highland and the relevant built-environment factors scored low, that publichealth concern was ranked as a priority.

VULNERABLE POPULATIONS

Vulnerable populations are those people who are sensitive to a public health issue due to a socio-economic or physiological concern. For example, households without cars are more sensitive to not having parks or grocery stores in walking distance, while older adults are more likely to be hospitalized from extreme heat.

BUILT ENVIRONMENT

The built environment is the physical parts of cities including streets, parks, and homes.

Critical

Highland's critical public health and chronic hazards are access to parks, safe and sanitary housing, and air pollution. These hazards rank critical because there is both a high number of vulnerable people and the built environment does not adequately address the hazard. Each is described in detail below.

ACCESS TO PARKS

Highland residents face many health challenges compared to the State averages. This includes elevated rates of asthma, cardiovascular disease, and obesity. This is true City-wide, and is more pronounced for DAC residents.[1] Compared to the State, very few Highland residents live within **one-half mile** of a City park. School parks and joint-use facilities after school hours play an important role in increasing park access, but when considering both City and school parks, fewer Highland households live within one-half mile of a park compared to the State average.[2] Parks and trees were also highlighted as priority needs. For these reasons, access to parks is a critical public health focus of this Public Health, Safety, and Environmental Justice Element.

ONE-HALF MILE

A half mile is used because it is considered biking distance.

AIR POLLUTION

Residents of Highland are exposed to chronic air pollution on a daily basis from adjacent freeways, and could be exposed to hazardous smoke events from wildfire in nearby wildfire risk areas. As discussed above, air pollution in the entire Inland Empire is a public health concern. Highland's DACs have a higher proportion of people who work outdoors and children compared the to the State. Both of these populations are considered to be more sensitive to air pollution, as people who work outdoors breath unfiltered air more often, and children's lungs are still developing. Highland does not have a high proportion of people who walk, bike, or take the bus to work, or older adults, populations also considered vulnerable to air pollution.[3] For these reasons, air pollution is a critical public health focus of this Element.

1 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

2 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

3 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

SAFE & SANITARY HOUSING

Residents of Highland's DACs are more likely to be renters than the average resident of the State. Additionally, of those renters, they are much more likely than the average Californian to pay more than one-half their income on housing costs.[4] Highland DACs are more likely to experience **overcrowding**, and most neighborhoods have higher than average habitability, indicating that housing is primarily an issue of cost. Households spending large proportions of their income on housing are less likely to repair their residence or relocate for health and safety concerns. For these reasons, safe and sanitary housing is a critical public health focus of this Element.

OVERCROWDING

Overcrowding is measures as more than one person per room. Uncrowded housing can improve mental health including stress and depression, decrease the spread of communicable diseases, and improve children's wellbeing and educational outcomes.

Important

Highland's important public health and chronic hazards are access to healthy food, libraries and community centers, extreme heat, and hazardous materials. These hazards rank important because there are a high number of vulnerable people and the built environment does not adequately address the hazard. Each is described in detail below.

ACCESS TO HEALTHY FOOD

Highland residents are more likely to be diagnosed with obesity and diabetes than State averages. This is true City-wide, and is more pronounced for DAC residents.[5] Residents of Highland's DACs are also more likely to be low income and not have access to a car, making walking or biking access to affordable healthy food important. Almost all residents of Highland's DACs communities live within a half mile of a grocery store. For this reason, maintaining access to healthy food and ensuring it is affordable is important.

LIBRARIES AND COMMUNITY CENTERS

All members of a community can benefit from having safe public spaces to gather, use free Wi-Fi, and access information, but this is especially true for low-income residents and those in over-crowded housing, both populations that are more common in Highland's DAC communities than the State. More than 75% of Highland's DAC households and none of the households outside the DACs live within a half mile of a library or community facility. There are multiple planned community facilities, and for these reasons, access to such facilities is considered important.

4 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

5 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

EXTREME HEAT

Older adults and outdoor workers are the most likely to be hospitalized during heat waves. This is because the bodies of older adults are more sensitive to heat waves and outdoor workers spend more time being exposed to heat and have a difficult time adapting during heat events without sacrificing income. Highland does not have a high proportion of older adults, but does have a higher than average number of outdoor workers.[6] Additionally, Highland has a lower proportion of **impervious surfaces**, but lower than average tree cover. Highland is forecasted to experience seven times more extreme heat days by 2050, and therefore extreme heat is considered important.[7]

IMPERVIOUS SURFACES

Impervious surfaces are non-natural urban surfaces, such as asphalt or concrete. These surfaces promote the urban heat island affect by absorbing heat and slowly releasing it. This is why it is cooler in a park – even outside of the shade – than a city street.

HAZARDOUS MATERIALS

There are no populations that are considered more vulnerable to hazardous materials, and therefore risk is assessed by how closepeople live to cleanup sites and routes where hazardous materialsare transported. There are multiple hazardous waste sites in or near Highland's DAC's, the highest concentration of which is located at the San Bernardino Airport. Therefore, hazardous materials are considered important.

Marginal

Highland's marginal public health and chronic hazards are public transportation and safe walking and biking (see **Figure 17**). Thesehazards rank marginal because Highland does not have vulnerablepopulations and/or the built environment addresses this concern well.These concerns should not be ignored, however, and existing successshould be celebrated and replicated throughout the community.

PUBLIC TRANSPORTATION

Highland's DAC households have lower than average access to a personal vehicle, but Highland does not have a high proportion of people who walk, bike, or take the bus to work. DAC residents live within proximity to public transit, as 75% of DAC residents live within one-quarter mile (walking distance) and virtually all residents live within one-half mile (biking distance) of a bus stop. Therefore, public transportation is considered marginal.[8]

SAFE WALKING AND BIKING

Similar to public transportation, Highland does not have a high proportion of residents who depend on walking or biking to get to work. Highland does have a high proportion of children who require additional

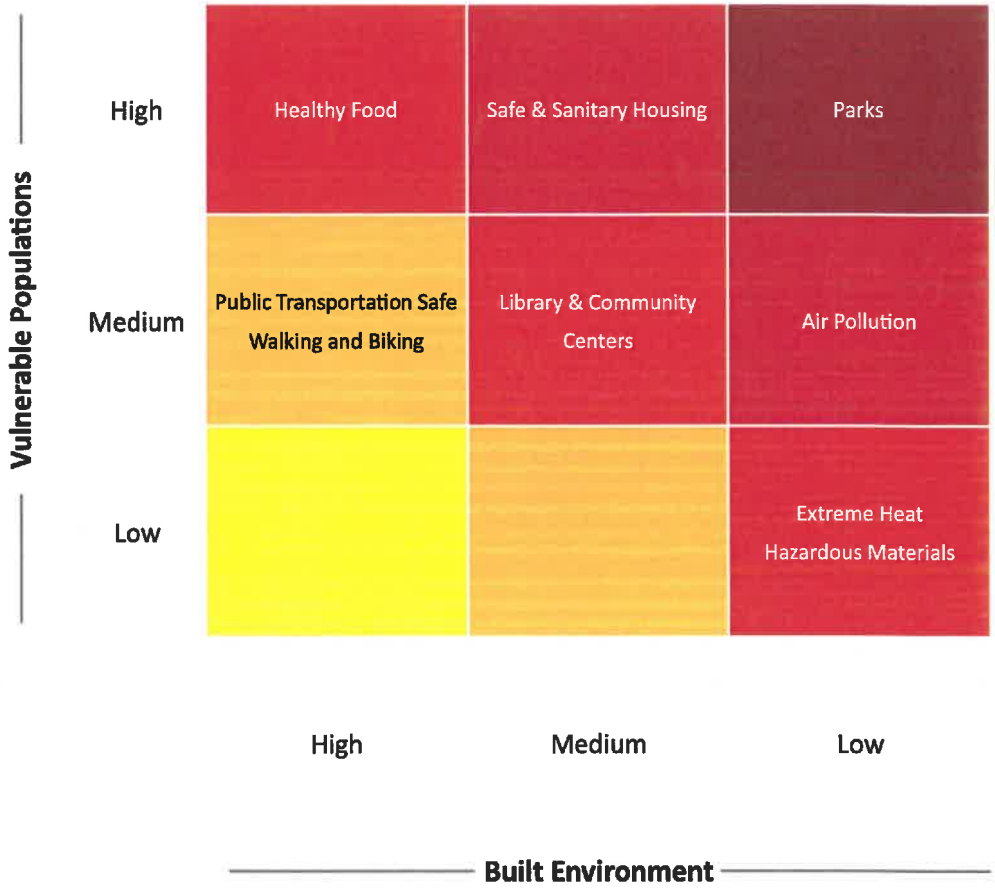
6 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

7 Cal-Adapt. 2020. Accessed July 30, 2020. https://cal-adapt.org/tools/extreme-heat/.

8 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

safety measures to feel safe walking and biking.[9] Many busy intersections in Highland have been improved, including with crossing guards during school hours. Therefore safe walking and biking is well addressed currently and considered marginal.

Figure 17. Public Health and Chronic Hazard Prioritization



EMERGENCY EVENTS

Based on the above analysis of each hazard, Highland's public health concerns were categorized into three categories from high to low priority: critical, important, and marginal. The risk level for each hazard was determined by looking at the potential impact for each hazard in the next 20 years (high, medium, low) and the City's current **adaptive capacity (high, medium, low)** (see **Figure 18**). The potential

ADAPTIVE CAPACITY

Adaptive capacity is the City's current capacity to respond to a hazard. This is determined by how well the City's plans and programs mitigate or prepare for a hazard.

9 Public Health Alliance. 2020. "The California Healthy Places Index." https://map.healthyplacesindex.org/.

impact is determined by how likely a hazard is to occur and how deadly and or damaging it could be. This is generally assessed by whether there are hazard zones in or near a community (such as a fire hazard or flood zone), if there are large populations or important facilities in those zones, the historic impact of that hazard, and/or the potential role of climate change. The adaptive capacity is assessed by how well the public is educated and prepared for a hazard, if there are a high number of vulnerable people, emergency alert and evacuation capacity, and if important facilities (including homes) meet hazard reduction standards through building materials and structural requirements.

Critical

Wildfire is Highland's only critical emergency event due to the likelihood of the hazard, probability of impact, and adaptive capacity.

WILDFIRE

Much of the eastern side of Highland is within a very high wildfire severity zone. Historic wildfires have occurred in these areas, as well as southeast of Highland. It is extremely likely that wildfires will occur in these areas between 2020 and 2050. Additionally, these areas include existing and planned land uses. The City currently requires many best practices for building, but these standards should be strengthened to meet the latest CAL FIRE guidance. For these reasons, wildfire is considered critical.

Important

Flooding and seismic hazards may occur in Highland between 2020 and 2050. The City currently has relevant policies and programs to ensure that new development minimizes the risk from these hazards, but older infrastructure and buildings are vulnerable to both hazards, and therefore they are considered important.

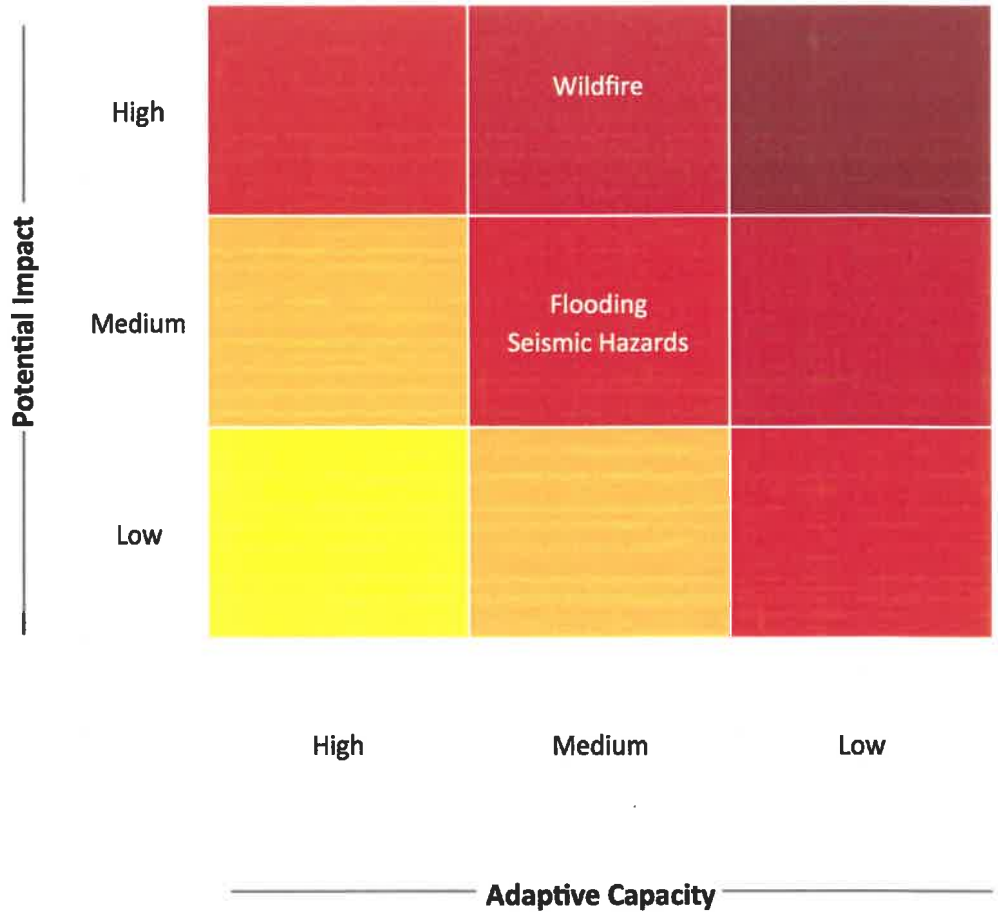
FLOODING

Large portions of undeveloped land, mostly concentrated in eastern Highland, are within the 100-year flood zone, where it is likely to flood between 2020 and 2050. There are some developed areas within the 500-year flood zone, where development standards protect homes and businesses. For these reasons flooding is considered important.

SEISMIC HAZARDS

Similar to many Southern California communities, an earthquake could occur in Highland at any time. There are active faults on the east side of Highland at the base of the mountains. Many older buildings do not meet the current seismic standards. Additionally, more than 300 buildings in the City were built before 1930, when unreinforced masonry buildings were banned. Highland was built west to east, so most vulnerable buildings are on the west side. For these reasons, seismic hazards are considered important.

Figure 18. Emergency Events Prioritization



5

GOALS, POLICIES, AND ACTIONS

Goal 1: Protect the health of community members by improving air quality.

Policy 1.1: Reduce air pollution from mobile sources.

Action 1.1a: Electric Vehicle Charging Stations. Promote the installation of electric vehicle charging stations at important destinations such as civic buildings, parks, and commercial hubs.

Action 1.1b: Fleet Management. Develop a fleet management program to increase the fuel efficiency and reduce emission of municipal vehicles.

Action 1.1c: Preferential Parking. Amend the zoning code to identify preferred locations for clean air vehicle parking required for new development.

Action 1.1d: Warehouse Standards. Include air quality and vegetation buffer standards for new warehouses uses and loading docks.

Policy 1.2: Reduce localized air pollution exposure near major roads.

Action 1.2a: Air Filters in Existing Buildings. Pursue grant funding to install air condition with HEPA filters in homes and schools within 1,000 feet of a major road.

Action 1.2b: Clean Air Development. Create a clean air checklist for new development of sensitive land uses within 1,000 feet of a major road. This checklist should include landscaping, ventilation systems, double-paned windows, setbacks, and barriers.

Goal 2: Promote a built environment that stays cool.

Policy 2.1: Promote a healthy urban forest to reduce air pollution and extreme heat.

Action 2.1a: Climate-Appropriate Trees. Develop a new street tree species palette that prioritizes trees based on having low water needs and adaptability to climate change and future environmental conditions.

Action 2.1b: Diverse Urban Forest. Maintain a healthy urban forest by ensuring a diversity of tree species.

Action 2.1c: Increase the Tree Canopy. Identify grant funding to develop a program to install additional street trees or provide canopy trees to residents for planting.

Action 2.1d: Street Tree Prioritization. Prioritize tree planting from approved street tree list based on the existing tree canopy and the population's vulnerability to extreme heat. Where possible, integrate shade trees with bike and pedestrian infrastructure.

Action 2.1e: Tree Planting in DACs. Prioritize tree planting in the DACs to reduce residents' vulnerability to extreme heat. Focus efforts on shade trees along sidewalks, at transit stops, schools, bike lanes, and within parks in the DACs.

Policy 2.2: Adopt policies and standards for the built environment that reduce urban heat island.

Action 2.2a: Green Development. Encourage cool or green roofs for new commercial buildings.

Action 2.2b: Cool Zones. Investigate the use of additional City facilities, such as recreation centers, to serve as cool zones.

Action 2.2c: Low-Income Weatherization Programs. Continue prioritize funding for efforts to repair and rehabilitate housing in disadvantaged communities, including programs and grants to weatherize houses for extreme heat and air pollution.

Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.

Policy 3.1: Minimize flooding risks through appropriate siting and protection of structures and occupants.

Action 3.1a: Flood Elevations. Continue to ensure finish floor elevations of new development are above the 100-year floodplain.

Action 3.1b: Development in the Floodway. Continue to limit uses in floodways to those tolerant of occasional flooding.

Action 3.1c: Flood-Resistant Critical Facilities. Continue to design new critical facilities to minimize potential flood damage. Such facilities include those that provide emergency response like hospitals, fire stations, police stations, utility lifelines, and ambulance services. Such facilities also include those that do not provide emergency response but attract large numbers of people, such as schools, theaters, and other public assembly facilities with capacities greater than 100.

Policy 3.2: Build and maintain public infrastructure that collects and conveys stormwater and enhances water quality.

Action 3.2a: Flood Channel Maintenance. Continue to maintain flood control channels and storm drains in accordance with habitat preservation policies through periodic dredging, repair, desilting, and clearing to prevent any loss in their effective use.

Action 3.2b: Stormwater Quality. Identify streets and intersections and other infrastructure that would be candidates for stormwater quality enhancement features.

Action 3.2c: Flood Control Funding. Continue to pursue funding opportunities for flood control projects, including collaboration with Federal, State, and local flood management agencies and other interested parties.

Policy 3.3: Implement programs and standards to mitigate wildfire risk in high wildfire hazard severity zones.

Action 3.3a: New **Development**. All development shall be required to meet the minimum standards for adequate fire protection. The most restrictive law, regulation, or ordinance regarding fire safety applicable to development in Highland will take precedence, including compliance with the most current SRA Fire Safe Regulations and Fire Hazard Reduction Around Buildings and Structures Regulations if applicable.

DEVELOPMENT

Development refers to any alterations to the natural land, residential or otherwise. Types of development are referenced to make policies more specific and can include existing development, new development, residential development and more.

Action 3.3b: New Residential Development in Areas Designated Very High Fire Hazard Severity Zone (VHFHSZ). Residential development within areas designated as VHFHSZs should be avoided or risks mitigated through compliance with applicable codes and standards, including compliance with the most current SRA Fire Safe Regulations and Fire Hazard Reduction around Buildings and Structures Regulations. If residential development occurs within VHFHSZ, a Fire Protection Plan that describes project specific fuel modification shall be required.

Action 3.3c: Home Improvements for Vulnerable Populations. For qualifying households, promote the use of rehabilitation programs and defensible space assistance, and provide information to vulnerable residents to assist with efforts to improve fire safety.

Action 3.3d: Wildfire Retrofits. Encourage structural hardening retrofits for existing structures in the VHFHSZ, consistent with the current standards.

Action 3.3e: New and Existing Public Facilities. The construction of new public facilities should occur outside of areas designated VHFHSZ when feasible. Existing public facilities in the High Fire Hazard Area shall be retrofitted to be consistent with the current standards.

Action 3.3f: Maintain Emergency Evacuation Routes. Ensure that the entity charged with maintenance of the road complies with the requirements of the State Fire Code and San Bernardino Consolidated Fire Codes regarding street width, surface, grade, radius, turnarounds, turnouts, bridge construction, and lengths of fire apparatus access roads. All requirements and any deviations will be at the discretion of the Fire Code Official. Enforce these standards on new development in VHFHSZ through development review, and on existing development through code enforcement. Work with the City's Geographic Information Systems (GIS) mapping services to identify any residential areas that do not have at least two emergency evacuation routes or are otherwise inadequate due to access or timeliness of evacuation. Develop an evacuation route improvement plan upon identification of evacuation route inadequacies.

Action 3.3g: Recover from Large Fires Safely. Perform an evaluation of fire-related development standards should a major wildfire require large portions of the City be rebuilt to ensure that redevelopment standards are as fire-safe as reasonably possible.

Action 3.3h: Adequate Peakload Water Supply will be Supported. The City will coordinate with the East Valley Water District to maintain long-term integrity of peakload water supply for structural fire-fighting and wildland fire-fighting and ensure new construction is serviceable by water supply.

Policy 3.4: Ensure that public facilities and infrastructure have adequate capacity to respond to wildfires and other relevant hazard events.

Action 3.4a: Performance Standards. Apply fire unit deployment performance measures with future planning of fire stations.

Action 3.4b: Emergency Equipment. Consider the long-term maintenance needs of emergency equipment and facilities when developing the annual budget.

Action 3.4c: Storm Drain Capacity. Continue to ensure that existing and new storm drain and street capacities are adequate to manage a 100-year flood event.

Action 3.4d: New Public Facilities. The construction of new public facilities should occur outside of areas designated VHFHSZ when feasible. Existing public facilities in the VHFHSZ shall be retrofitted to be consistent with the current standards.

Policy 3.5: Enforce development standards to reduce geologic risk.

Action 3.5a: Soil Reports in Liquefaction Zones. When applicable, continue to require soil reports and implement recommendations for projects in identified areas where liquefaction or other soil issues exist.

Action 3.5b: Soil Reports for Projects on Fill. When applicable, continue to require a preliminary soil report and a report of satisfactory placement of fill prepared by a licensed geotechnical engineer or civil engineer for all buildings and structures supported on fill.

Action 3.5c: Foundation Reports. When applicable, continue to require a preliminary report for all buildings and structures supported on natural ground unless the foundations have been designed in accordance with current standards.

Action 3.5d: Renovations. Continue to require seismic retrofits for major renovations in accordance with Historic and Building Code provisions.

Policy 3.6: Prioritize seismic retrofits of buildings that pose the greatest risk.

Action 3.6a: Unreinforced Masonry Structures. Consistent with State law and when applicable, require the retrofitting of unreinforced masonry structures to minimize damage in the event of seismic or geologic hazards.

Action 3.6b: Retrofitting of Essential Facilities. When feasible, seismic retrofit essential facilities to minimize damage in the event of seismic or geologic hazards.

Policy 3.7: Limit the potential hazards from the transportation and disposalof hazardous waste.

Action 3.7a: Hazardous Materials Storage and Transport. Continue to require businesses that store or transport hazardous materials to prepare a Hazardous Materials Business Plan for review and approval by the Lead Environmental Agency.

Action 3.7b: Hazardous Materials Studies. When appropriate, require new development to preparea hazardous materials inventory and/or prepare Phase I or Phase II hazardous materials studies, including any required cleanup measures.

Action 3.7c: Household Education. Educate the public on household hazardous wastes and the proper methods of disposal.

Goal 4: Maintain adequate emergency preparedness and response capabilities.

Policy 4.1: Create culturally appropriate hazard preparation and education.

Action 4.1a: Emergency Alerts for Air Pollution. Use the emergency alert systems and other standard City communications to alert the public when local air quality reaches "Very Unhealthy" levels.

Action 4.1b: Neighborhood-Based Preparedness. Convene and regularly train neighborhood-based emergency response teams (e.g., CERT) and explore incorporating climate change response and recovery. Ensure CERT recruiting includes a diverse set of community members and leaders.

Action 4.1c: Disaster Kits. Work with local places of worship and community organizations to provide disaster kits to vulnerable populations.

Policy 4.2: Create resilience centers throughout highland.

Action 4.2a: Back Up Power. Continue to ensure that critical City facilities have back up energy sources such as battery storage. Prioritize clean energy sources, such as solar, where feasible.

Action 4.2b: Refrigeration. Install refrigerators at resilience centers, such as existing cooling centers and emergency shelter locations, to provide storage for medication in black out or other hazard events.

Action 4.2c: Audit Emergency Childcare. Work with non-profit organizations, such as the Red Cross, to offer emergency childcare for frontline workers in the event that schools are closed in a hazard event.

Action 4.2d: Food Distribution. Work with local foodbanks to distribute food and pop-up food pantries during hazard events.

Action 4.2e: Advertise Regional Programs. Include information on regional assistance programs in appropriate languages during a hazard event.

Policy 4.3: Prepare residential areas for flooding and wildfire.

Action 4.3a: Elevate and Anchor. Educate and encourage property owners in flood zones to elevate and anchor critical utilities, including electrical panels, propane tanks, sockets, wiring, appliances, and heating systems.

Action 4.3b: Sandbags. Implement a sandbag program available for residents in flood zones prior to heavy storms.

Action 4.3c: Fire Safe Communications. Prior to fire season, use outreach events and City communication resources to educate the public on how they can create a defensible space around their place of residence and evacuate in case of fire.

Action 4.3d: Require evacuation assessments on residential projects requiring an Environmental Impact Report in designated wildfire hazard severity zones.

Policy 4.4: Ensure the Emergency Operations Center (EOC) has adequate capacity to respond to hazard events.

Action 4.4a: EOC Technology. Continue to conduct a periodic review of technology used to support the EOC to ensure systems are updated and effective, including City GIS.

Action 4.4b: EOC Equipment. When feasible, update EOC equipment and supplies as necessary to ensure effectiveness.

Action 4.4c: Staff Training. Continue EOC training and exercise plan for the City staff with EOC responsibilities, and cross train city staff at various EOC positions.

Action 4.4d: Online Training. Expand staff training by conducting quarterly online WebEOC training for EOC staff. Include extended training formats as applicable.

Action 4.4e: Mutual Aid Participation. Continue to participate in Statewide Master Mutual Aid Agreements and local automatic aid agreements.

Goal 5: Improve the quality of the built and natural environments to reduce disparate health and environmental impacts.

Policy 5.1: Adopt land use regulations that protect residential and park uses from the impacts of industrial and roadway pollution.

Action 5.1a: Land Use Review. Conduct a review of existing Municipal Code to determine where existing legislation encourages or allows land uses and programs that are detrimental to the health of residents in DACs.

Action 5.1b: Monitor Industrial Areas. Establish a monitoring program to periodically evaluate and report the immediate and long-term health and environmental impacts of the proximity of residential and park uses to industrial areas in DACs.

Action 5.1c: Siting Industrial Uses. Disallow siting and construction of new industrial uses that could impact the health of residents in the DACs.

Policy 5.2: Remediate and prevent pollution arising from industrial and household sources.

Action 5.2a: Pollution Review. Conduct a review to determine where existing pollution sources are impacting residents in the DACs.

Action 5.2b: Hazards Cleanup. In conjunction with other local and regional agencies, ensure the cleanup of contaminated surface water, groundwater, and soils in affected DACs.

Goal 6: Green Streets. Prevent future groundwater pollution by implementing green street strategies to support a sustainable approach to stormwater, drainage, groundwater recharge, and landscaping, and incorporating green streets standard and guidelines in all streetscape improvements where feasible. Ensure access to healthy food.

Policy 6.1: Promote the growing of fruits and vegetables by local residents.

Action 6.1a: School Gardens. Permit and promote "edible school yards" that provide gardens and gardening programs on school property.

Action 6.1b: Urban Agriculture. Amend the Zoning Code to allow privately owned vacant property to be used for urban agriculture.

Action 6.1c: Local Healthy Food. Encourage, through a public information campaign, street vendors, convenient stores, and other food outlets, to sell fresh produce and to reduce unhealthy food options.

Policy 6.2: Use City resources to publicize healthy food and food assistance programs.

Action 6.2a: Healthy Food at Public Events. Require that all City-sponsored events and City facilities provide healthy food options.

Action 6.2b: Food Assistance Programs. Advertise food assistance programs in City marketing materials and distribute information on food assistance programs including food pantries and banks.

Goal 7: Ensure safe and sanitary housing for DAC residents.

Policy 7.1: Promote improvements and rehabilitation of unsafe housing in DACs, while actively preventing displacement.

Action 7.1a: Rental Rehab. Develop a program to assist owners of rental units to rehabilitate their properties, especially those with affordable units and housing in the DACs, to meet current building standards in tandem with affirmatively furthering fair housing policies.

Action 7.1b: Low Income Weatherization. Explore administering Community Development Block Grant programs and other grants to provide free or reduced-cost weatherization for extreme heat and air pollution.

Action 7.1c: Lead Paint Testing. Include mandatory lead-based-paint testing as part of any City-funded housing rehabilitation and other housing assistance programs that may be offered.

Policy 7.2: Adopt standards and policies that maintain safe and sanitary housing.

Action 7.2a: Code Enforcement. Focus code enforcement efforts in DACs to improve unsafe and unsanitary conditions, focusing on trash and dumping, overcrowding, illegal home businesses, illegal garage conversions, graffiti, unpermitted plumbing and electrical, and lack of buildingand yard maintenance. Have code enforcement officers distribute information on tenant rights and owner and landlord responsibilities when conducting site visits. Distributedinformation should be translated into all relevant languages

Action 7.2b: Tenant Rights. Distribute tenant rights information and ensure that renters are not penalized for reporting on dwelling units that do not meet health and safety standards. All written outreach efforts should be translated into all relevant languages.

Action 7.2c: Crime-Free Multi-Housing Program. Encourage all apartment building owners to participate in the Crime-Free Multi-Housing Program operated by the City Police Department to reduce crime, drugs, and gangs on apartment properties.

Action 7.2d: Home Assistance. Continue to provide support for programs and facilities that provide homes for those without shelter and focus future efforts on specifically addressing the issues that arise on streets and in parks in the DACs.

Goal 8: Ensure that parks, public facilities and services are equitably located and distributed throughout DACs, allowing easy access for residents.

Policy 8.1: Improve existing park quality by providing amenities and programs for play, exercise, and enhanced safety. Prioritize efforts that can be deployed quickly in under-parked communities.

Action 8.1a: Park Access. Seek to increase the current percentage of residents within a 10-minute walk of a park, by using underused or vacant land as open space or parks.

Action 8.1b: Park Activation. Activate existing parks with permanent work out infrastructure for all ages and repair and maintain existing facilities.

Action 8.1c: Park Programs. Expand and tailor recreational and park programs, facilities, and services to meet evolving community needs. Programs and services should remain accessible and relevant to today's residents, responding to unique cultural, historic, and social needs, as well as changing demographics and income levels.

Action 8.1d: Community Events. Create a simple, accessible, and affordable process for requesting street closures and park permits for public and neighborhood events of all sizes. All forms should be translated into all relevant languages.

Policy 8.2: Expand park availability by converting underutilized land.

Action 8.2a: Vacant Lot Conversions. Offer fee reductions and other incentives to convert vacant lots or underutilized public rights-of-way into small parks, community gardens, or open spaces.

Action 8.2b: Linear Parks and Trails. Seek opportunities to convert public easements, such as utility corridors and parkway vistas, into parks and trails.

Action 8.2c: Parks Partnerships. Partner with schools, places of worship, and businesses to expand access to green spaces and recreation areas, especially in DACs with less accessibility to green spaces and recreation areas.

Action 8.2d: Safe Routes to Parks. Develop a Safe Routes to Parks and Schools program to promote safe, active, and engaging ways to access parks and schools.

Policy 8.3: Create inviting public spaces in DACs where people feel safe during the day and night for everyday play, family gatherings, and community events.

Action 8.3a: Public Art. Develop more public art, fountains, and other streetscape improvements that beautify Highland's streets and provide a collection of permanent outdoor artworkthroughout the City. Identify opportunities to support and fund local artists and students to createpublic art in the City.

Action 8.3b: Crime Prevention. Adopt Crime Prevention Through Environmental Design (CPTED) guidelines that deter criminal activity in neighborhoods, streets, and public areas. Include guidelines for the design of play areas, parks, sports facilities, streets and sidewalks, plazas and urban pocket parks, and housing and commercial sites, among others.

Action 8.3c: Virtual Community Resources. Provide virtual resources through the library, such as e-book services and virtual programs for those who do not have easy access to community facilities.

Goal 9: Promote and ensure meaningful and effective participation and community capacity building in DACs, especially when developing, adopting, implementing, and enforcing plans and policies related to public health and environmental issues.

Policy 9.1: Create transparent City processes and forms accessible to all residents.

Action 9.1a: City Contacts. Distribute, house-to-house in DACs, City information on all programs and City events, including phone numbers and contact information, especially for call enforcement and housing needs. All information to be translated in all relevant languages.

Action 9.1b: Meeting Advertisements. Install signage at neighborhood markets in DACs to promote and advertise City meetings and other public announcements.

Action 9.1c: Civic Engagement. To promote civic engagement, partner with appropriate organizations (e.g., community-based, faith-based, advocacy, and service) that have built relationships and trust within DACs to conduct meaningful outreach.

Action 9.1d: Virtual Meetings. Provide virtual participation options for in-person public hearings.

Policy 9.2: Host City Council events focused on the issues facing DACs and encouraging additional community involvement.

Action 9.2a: Open Houses. Invite residents of DACs for City Hall open houses and tours.

Action 9.2b: DAC Tours. Conduct City Councilmember visits to DACs to encourage discussion on items that affect the residents and businesses. Have City Council accompanied by representatives from the Police, Code Enforcement, Development and Community Services, and other departments. Host an annual community walk with the Mayor and other City Council members.

Action 9.2c: DAC Meetings. Dedicate one City Council meeting per year to DACs, having staff update the Council on improvements made and further needs of the residents and business owners in those communities. Provide translation headsets at all City Council meetings so that residents can engage firsthand with the content of the meetings.

Policy 9.3: Support equitable and inclusive opportunities to build capacity and leadership skills for residents and organizations in DACs through continued civic engagement.

Action 9.3a: Youth Engagement. Partner with school districts, community colleges, and continuing education institutions to promote civic engagement opportunities.

Action 9.3b: Community Leaders. Support and expand opportunities to build and sustain capacity among residents to advocate and engage for community and systems improvements to develop their skill sets as community leaders and to advance their roles as trusted messengers.

Action 9.3c: Board Memberships. Specifically invite residents from DACs to become board, commission, and task force members as openings occur.

Action 9.3d: Community Driven Initiatives. Support community-driven initiatives in DACs to address priorities and needs through technical assistance, data sources, meeting spaces, support services, and other staff resources.

Goal 10: Prioritize improvements and programs that address the needs of residents in DACs.

Policy 10.1: Support and expand programs and services to prioritize those that identify DACs, address environmental justice issues, and foster partnerships with countywide partnerships and programs.

Action 10.1a: Ongoing Engagement. Provide ongoing engagement with residents and stakeholders to evaluate additional criteria for the inclusion of communities not currently identified as DACs.

Action 10.1b: Funding Priorities. Prioritize funding and fiscal decisions for recreation, air quality and other environmental improvements, public infrastructure investments, community programming, and engagement opportunities in DACs.

Action 10.1c: Monitoring. Monitor progress of the goals, policies, and actions from this Element.

Action 10.1d: Annual Review. Conduct an annual review of the implementation of the goals, policies, and action of the Public Health, Safety, and Environmental Justice Element to monitor progress on goals, policies, and implementation of programs and actions and provide this information to environmental justicecommunities. Present this annual review to City Council on a regularly scheduled agenda and invite residents and businesses of the DACs to attend and provide input.

Action 10.1e: Plan Integration. Examine existing processes and practices for ways to embed environmental justice goals, policies, and actions throughout future updates to General Plan Elements, sustainability plans, Municipal Code, and other City-initiated planning efforts.

ATTACHMENT 3

Circulation Element Amendments

Intergovernmental Coordination

With a freeway and an adjacent international airport, Highland plays a significant role in the regional circulation network. As such, the City must actively coordinate with a variety of regional and subregional plans and state, regional and local agencies as described in the Introduction section of this element. Some of the key issues facing Highland that will require continuing coordination include the following.

Roadway Classification Consistency with Other Agencies

San Bernardino County, the City of San Bernardino and the City of Redlands have different functional classifications for some of the roadway segments illustrated on the City of Highland proposed General Plan. The roadway segments with different functional classifications include:

- Del Rosa Drive between 3rd Street and Base Line;
- Del Rosa Avenue between 3rd Street and Pacific Street;
- Palm Avenue between Base Line and Pacific Street;
- 5th Street between Shirley Avenue and Palm Avenue;
- Base Line between Church Avenue and Boulder Avenue;
- 3rd Street between Sterling Avenue and Church Avenue;
- Boulder Avenue between Highland Avenue and Orange Street;
- ~~Cone Camp Road extension; and~~
- ~~Greenspot Road extension to Bryant Avenue.~~

Table 3.3 shows the roadway segments with different functional classifications among different jurisdictions.

Completion of I-210/SR-30

The construction connecting I-210 with SR-30 will be completed by the end of 2007. The regional long-range projections indicate that SR-30 through Highland will need to be widened to six lanes. Measure I, which has been reauthorized for 30 additional years, includes a widening project for SR-30 from I-215 to I-10. The SR-30 widening will include an additional general use lane in each direction. Further coordination with SANBAG and Caltrans will be needed in ensure the timely implementation of the I-210 and SR-30 project.

Table 3.3: General Plan Circulation Element Comparison

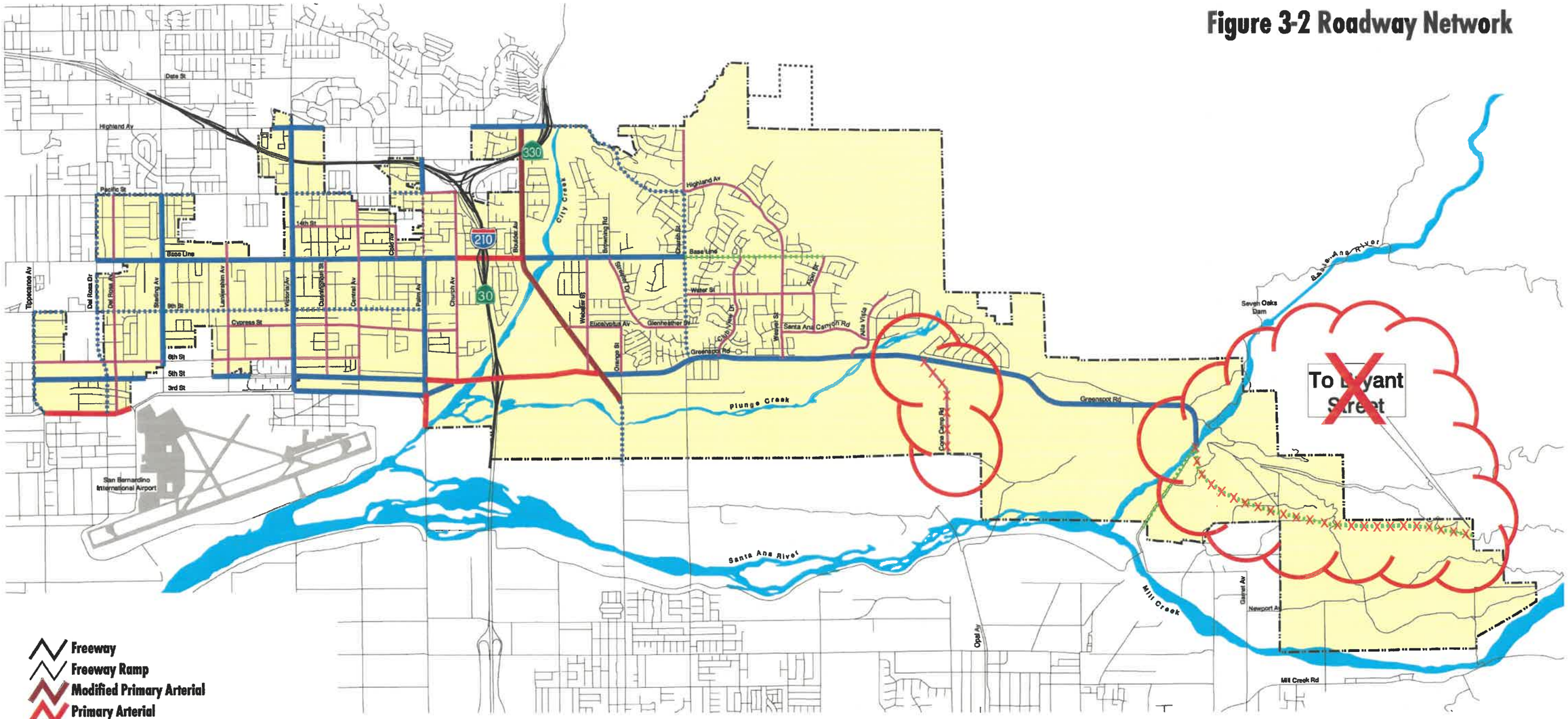
Street	From	To	City of Highland General Plan Designation	City of SB General Plan Designation	City of Redlands General Plan Designation	County of SB General Plan Designation
Del Rosa Drive	3rd Street	Base Line	Secondary Highway (4D)	Major Arterial (6D)	N/A	Major Highway (4D)
Del Rosa Avenue	3rd Street	Pacific Street	Collector Street (2U)	Not Shown	N/A	Secondary Highway 4U)
Palm Avenue	Base Line	Pacific Street.	Special Collector Street (2U)	Major Arterial (6D)	N/A	Major Highway (4D)
5th Street	Shirley Avenue	Palm Avenue	Major Highway (4D)	Major Arterial (6D)	N/A	Major Highway (4D)
Base Line	Church Avenue	Boulder Avenue	Primary Arterial (6D)	Major Arterial (6D)	N/A	Major Highway (4D)
3rd Street	Sterling Avenue	Church Avenue	Major Highway (4D)	Major Arterial (6D)	N/A	Not Proposed
Boulder Avenue	Highland Avenue	Orange Street	Modified Primary Arterial (6D)	Major Arterial (6D)	Minor Arterial (4D)	Major Highway (4D)
~~Cone Camp Road Extension~~			~~Collector Street (2U)~~	N/A	~~Not Proposed~~	N/A
~~Greenspot Extension to Bryant Street~~			~~Special Secondary Highway (2D)~~	N/A	~~Not Proposed~~	N/A

Numbers of lanes per designation are identified in parentheses, e.g., (4D); "D" or "U" indicates whether the roadway is divided or undivided.
N/A – Not Applicable

Victoria Avenue and the Potential Interchange

Identified as the major entryway into the San Bernardino International Airport and serving as the linkage between the Airport and San Manuel Indian Casino and Bingo facility, Victoria Avenue serves as a potential new interchange for I-210. Additional study is necessary to determine the feasibility of the interchange, its potential configuration and right-of-way requirements, the possible deletion of the existing ramps along Arden Avenue, and the impact to the nearby arterial roadway systems. To preserve adequate rights-of-way for the Airport entry and accommodate future traffic, Victoria Avenue is planned as a Major Highway on the Circulation Map. Future study will require coordination with Caltrans, SANBAG, the City of San Bernardino, the San Bernardino International Airport Authority, the San Manuel Band of Mission Indians, and the County of San Bernardino.

Figure 3-2 Roadway Network



- Freeway
- Freeway Ramp
- Modified Primary Arterial
- Primary Arterial
- Major Highway
- Secondary Highway
- Special Secondary Highway
- Collector Street
- Special Collector Street
- City Boundary
- Sphere of Influence

Source: Urban Crossroads

0' 4000'

ATTACHMENT 4

Initial Study/Negative Declaration

INITIAL STUDY/NEGATIVE DECLARATION

CITY OF HIGHLAND GENERAL PLAN AMENDMENT: HOUSING ELEMENT AND PUBLIC HEALTH, SAFETY, AND ENVIRONMENTAL JUSTICE ELEMENT

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Table of Contents

SECTION		PAGE NO.
ACRONYMS AND ABBREVIATIONS		II
1	INTRODUCTION	1
	1.1 Project Overview	1
	1.2 California Environmental Quality Act Compliance	1
	1.3 Initial Study Checklist	2
2	PROJECT DESCRIPTION	4
	2.1 Housing Element Update	4
	2.2 Public Health, Safety and Environmental Justice Element	6
3	INITIAL STUDY CHECKLIST	8
	3.1 Aesthetics	13
	3.2 Agriculture and Forestry Resources	14
	3.3 Air Quality	16
	3.4 Biological Resources	18
	3.5 Cultural Resources	20
	3.6 Energy	21
	3.7 Geology and Soils	22
	3.8 Greenhouse Gas Emissions	24
	3.9 Hazards and Hazardous Materials	26
	3.10 Hydrology and Water Quality	29
	3.11 Land Use and Planning	32
	3.12 Mineral Resources	33
	3.13 Noise	34
	3.14 Population and Housing	36
	3.15 Public Services	37
	3.16 Recreation	38
	3.17 Transportation	40
	3.18 Tribal Cultural Resources	41
	3.19 Utilities and Service Systems	42
	3.20 Wildfire	44
	3.21 Mandatory Findings of Significance	45
4	REFERENCES	47
	4.1 References Cited	47

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
BMP	Best Management Practice
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
City	City of Highland
CNEL	Community Noise Equivalent Level
DACs	Disadvantaged Communities
dB	Decibel
EIR	Environmental Impact Report
EOC	Emergency Operations Center
GHG	Greenhouse Gas
GPA	General Plan Amendment
HCD	Housing and Community Development
HFHSZ	High Fire Hazard Severity Zone
IS	Initial Study
MRZ	Mineral Resource Zones
NFIP	National Flood Insurance Program
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
RHNA	Regional Housing Needs Assessment
SCAG	Southern California Association of Governments
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SWPPP	Stormwater Pollution Prevention Plans
TDSP	Transit District Specific Plan

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1 Introduction

1.1 Project Overview

The purpose of the proposed project is to provide updates to the Housing Element and the Public Health, Safety and Environmental Justice Element of the City of Highland (City's) General Plan. The City's General Plan provides the policy framework for the long-range planning of physical development in the community. The City's General Plan consists of the following elements: Land Use, Circulation, Public Services and Facilities, Conservation and Open Space, Public Health and Safety, Noise, Housing, Economic Development, Community Design and Airport. This project involves an amendment to the General Plan in order to adopt, as required by State Law, an updated Housing Element as well as to update the Public Health and Safety Element through the adoption of a new Public Health, Safety, and Environmental Justice Element. The Housing Element of the General Plan is intended to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Elements every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers. The Public Health, Safety, and Environmental Justice Element of the General Plan combines two state-required elements: the Safety Element and the Environmental Justice Element. The intent of the Public Health, Safety, and Environmental Justice Element is to prioritize actions that address the greatest health risks to the City and its residents over the next 20 years. It guides how the City is designed, regulated, and built to ensure that people can access healthy food and places to play, that the air is clean, and that hazards will not impact important buildings and services. The Public Health, Safety, and Environmental Justice Element also identifies and prioritizes the needs of disadvantaged communities (DACs) to address compounding health concerns.

1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA), a statewide environmental law described in California Public Resources Code, Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

The City's Community Development Department directed and supervised the preparation of this Initial Study (IS)/Negative Declaration (ND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/ND reflect the independent judgment of the City.

1.3 Initial Study Checklist

The following Environmental Checklist (i.e., IS) was prepared per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the project.

For this IS/ND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

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2 Project Description

This project involves an amendment to the General Plan in order to adopt, as required by State Law, an updated Housing Element as well as to update the Public Health and Safety Element through the adoption of a new Public Health, Safety, and Environmental Justice Element. The Housing Element of the General Plan is intended to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Elements every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers. The Public Health, Safety, and Environmental Justice Element of the General Plan combines two state-required elements: the Safety Element and the Environmental Justice Element. The intent of the Public Health, Safety, and Environmental Justice Element is to prioritize actions that address the greatest health risks to the City and its residents over the next 20 years. It guides how the City is designed, regulated, and built to ensure that people can access healthy food and places to play, that the air is clean, and that hazards will not impact important buildings and services. The Public Health, Safety, and Environmental Justice Element also identifies and prioritizes the needs of disadvantaged communities (DACs) to address compounding health concerns.

2.1 Housing Element Update

Background

Since 1969, the State of California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their "general plan." The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law."

The proposed 2021-2029 Housing Element represents the City's effort in fulfilling the requirements under State Housing Element law. The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State's major housing goal. Recognizing the important role of local planning and housing programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a housing element as part of the comprehensive General Plan.

Pursuant to State law, the Housing Element must be updated periodically according to statutory deadlines. The proposed Housing Element covers the planning period of October 15, 2021 to October 15, 2029.

State Law requires that the Housing Element include the following components:

- An evaluation of the efficacy of the previous Housing Element's progress in plan implementation and appropriateness of the goals, policies, and programs.
- An analysis of the City's population, household, and employment base, and the characteristics of the housing stock.
- A summary of the present and projected housing needs of the City's households.
- A review of potential constraints to meeting the City's identified housing needs.
- An evaluation of Fair Housing to identify disproportionate housing needs.
- A statement of the Housing Plan to address the identified housing needs, including housing goals, policies, objectives, and programs.

The Housing Element is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region. The Housing Element builds upon the other General Plan elements and is consistent with the policies set forth by the General Plan, as amended. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

The City also recognizes that recent changes to State laws require the updating of various elements of the General Plan, upon update of the Housing Element, to address the following issues related to environmental justice, flood hazards and flood management, fire hazards, sea level rises, and other climate change-related issues.

This 2021-2029 Housing Element update is coordinated with updates to these other elements of the General Plan to ensure consistency in policy frameworks, and efficient and comprehensive outreach efforts.

Housing Plan

As required by State Housing Element law, the Housing Element Update includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA allocation. The goals, objectives, policies, and implementing programs of the Housing Plan emphasize: methods of encouraging and assisting in the development of new housing for all income levels; providing and maintaining adequate capacity to meet the housing need; removing government constraints to development, where feasible and legally possible; conserving and improving existing housing; providing increased opportunities for home ownership; reducing impediments to fair housing choice; and monitoring and preserving units at risk of converting from affordable to market rate. The Housing Plan also includes numerous policies to better guide decisions and achieve desired outcomes related to the development, improvement, preservation, and maintenance of housing.

The following goals are included within the new Housing Element Update:

Goal 1:	A preserved and enhanced housing stock within high qualify neighborhoods.
Goal 2:	A diverse range and adequate supply of housing types that aligns with the needs of all current and future Highland households.
Goal 3:	A City with adequate sites and resources appropriate for accommodating a variety of housing types.
Goal 4:	An affordable housing supply that equitably meets the needs of extremely low-, very low-, low-, and moderate-income households.
Goal 5:	A City with a broad range of housing types to meet the diverse needs of all Highland residents.

The proposed Housing Element Update is available at: https://www.cityofhighland.org/317/6th-Cycle-Housing-Element-Update

2.2 Public Health, Safety, and Environmental Justice Element

A Public Safety Element is part of the City of Highland's General Plan. The new Public Health, Safety, and Environmental Justice Element combines two state-required Elements: Safety and Environmental Justice. The Safety Element is a required Element and must be addressed by every city and County in California. Environmental Justice is a required Element for cities with disadvantaged communities (DACs), including Highland.

The Public Health, Safety, and Environmental Justice Element outlines risk and equity concerns the City faces from natural and public health hazards. With regard to public health hazards, the Public Health, Safety, and Environmental Justice Element looks at five specific public health hazards: 1) access to healthy living, 2) pollution exposure, 3) physical activity, 4) public facilities, and 5) safe and sanitary homes. With regard to natural health hazards, the Public Health, Safety, and Environmental Justice Element looks at hazards associated with air quality; hazardous materials; extreme heat; flooding and extreme storms; geologic hazards including landslides and slope instability, earthquakes and liquefaction; and wildfires. The Public Health, Safety, and Environmental Justice Element addresses emergency preparedness and emergency response and ultimately establishes goals, policies and actions designed to minimize natural and public health hazards within the City. The following goals are included within the new Public Health, Safety, and Environmental Justice Element Update:

Goal 1:	Protect the health of community members by improving air quality.
Goal 2:	Promote a built environment that stays cool.
Goal 3:	Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.
Goal 4:	Maintain adequate emergency preparedness and response capabilities.
Goal 5:	Improve the quality of the built and natural environments to reduce disparate health and environmental impacts.
Goal 6:	Green Streets. Prevent future groundwater pollution by implementing green street strategies to support a sustainable approach to stormwater, drainage, groundwater recharge, and landscaping, and incorporating green streets standard and guidelines in all streetscape improvements where feasible. Ensure access to healthy food.
Goal 7:	Ensure safe and sanitary housing for DAC residents.
Goal 8:	Ensure that parks, public facilities and services are equitably located and distributed throughout DACs, allowing easy access for residents.
Goal 9:	Promote and ensure meaningful and effective participation and community capacity building in DACs, especially when developing, adopting, implementing, and enforcing plans and policies related to public health and environmental issues.
Goal 10:	Prioritize improvements and programs that address the needs of residents in DACs.

The proposed Public Health, Safety, and Environmental Justice Element Update is available at:https://www.cityofhighland.org/DocumentCenter/View/1870/City-of-Highland-Draft-Public-Health-and-Safety-Element-PDF

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3 Initial Study Checklist

1. **Project title:**

   City of Highland General Plan Amendment: Housing Element and Public Health, Safety, and Environmental Justice Element Updates

2. **Lead agency name and address:**

   City of Highland
   Planning Department
   27215 Base Line
   Highland, CA 92346

3. **Contact person and phone number:**

   Lawrence A. Mainez, Community Development Director
   27215 Base Line
   Highland, CA 92346
   (909) 864-6861, ext. 215

4. **Project location:**

   Citywide.

5. **Project sponsor's name and address:**

   City of Highland
   Planning Department
   27215 Base Line
   Highland, CA 92346

6. **General plan designation:**

   Various; Not Applicable for Adoption of Housing and Public Health, Safety, and Environmental Justice Element Updates.

7. **Zoning:**

   Various; Not Applicable for Adoption of Housing and Public Health, Safety, and Environmental Justice Element Updates.

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

The proposed General Plan Amendment (GPA) would amend the City of Highland General Plan with updates to the Housing Element for the planning period of 2021 through 2029 and adoption of a new Public Health, Safety, and Environmental Justice Element.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The City of Highland is predominantly a residential community; over 60 percent of the City's 11,948 acres of land is planned for residential development. Additionally, more than 20 percent of the City is designated primarily for open space, due primarily to the City's proximity to the San Bernardino Mountains, the San Bernardino International Airport, the Santa Ana River Basin and City Creek and Plunge Creek running through the southern part of Highland. The City of Highland is bound by City of San Bernardino is to the west, San Bernardino National Forest to the north and east, and City of Redlands is to the south. Both San Bernardino and Redlands are developed with established residential neighborhoods, commercial corridors, light industrial and office uses, parks, schools and other community-serving facilities, public services, and utilities.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed Housing Element complies with state law; however, HCD approval is not required for the City's adoption of the Housing Element. There are no other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) for the proposed Housing Element and Public Safety Element.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes; the City sent letters to tribes on June 18, 2021. The San Manuel Band of Mission Indians requested consultation. The City and San Manuel Band of Mission Indians met on July 6, 2021. The San Manuel Band of Mission Indians submitted email correspondence to the City on August 4, 2021 concurring with the findings that the project would not result in adverse effects to tribal cultural resources. The San Manuel Band of Missions Indians attached preferred language regarding mitigation measures for any future projects developed after adoption of the proposed project. Future new development will undergo future environmental review, as necessary, and the provided mitigation measures will be considered in that future process. The San Manuel Band of Mission Indians submitted email correspondence to the City on October 5, 2021 confirming that the tribe has no further comments at this time and that the consultation ended after the July 6 meeting with the City.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

☐ 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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

12/1/21
Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, 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?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–d: No Impact.

The Housing Element update is a policy document, and adoption of this Element alone would not produce environmental impacts. The Housing Element Update consists of an updated housing program for which, no actual development or rezoning is proposed as part of the update. Implementation of the programs contained in the document would accommodate development required to meet the City's 2021-2029 RHNA allocation. To accommodate this RHNA allocation, City staff reviewed the inventory of vacant and underutilized sites and identified sites that can accommodate the current RHNA allocation for the 2021-2029 Housing Element Update. Any such development would be expected to conform to existing General Plan policies, municipal code, and zoning code development standards. As such, the adoption of the General Plan Amendment and the Housing Element update would not degrade the visual character or quality, scenic resources, or generate light and glare impacts. Additionally, there are no designated state scenic highways within the City of Highland jurisdictional boundaries. Portions of State Route (SR-) 330 are classified as eligible state scenic highway; however only a small segment, approximately 350 feet, extends into Highland City limits at the northern jurisdictional boundary between Highland Avenue and Boulder Avenue (Caltrans 2019). The Housing Element Update would not include policies that would result in impacts to scenic resources within a state scenic highway. No aesthetic impacts would occur from the adoption of this policy document.

The new Public Health, Safety, and Environmental Justice Element includes updated goals policy information related to natural and public health and hazards information. These goal and policy updates are procedural and will not result in physical changes to the environment such that aesthetics or visual character would change. In fact, implementation of some of the policies included within the Public Health, Safety, and Environmental Justice Element could in fact enhance aesthetics in the City. These include the following:

Policy 2.1: Promote a healthy urban forest to reduce air pollution and extreme heat.

Policy 8.2: Expand park availability by converting underutilized land.

Policy 8.3: Create inviting public spaces in DACs where residents people feel safe to use during the day and night for everyday play, family gatherings, and community events.

As such, no aesthetic impacts would occur from the adoption of this policy document.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY 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 Department 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–e: No Impact.

The Housing Element Update is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts, because no actual development or rezoning is proposed as part of the update. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, such development would not impact agricultural resources. The Housing Element Update does not propose any improvements within lands designated Prime Farmland or Unique Farmland by the CDOC FMMP (CDOC 2014). The Housing Element Update does not change any boundaries or the potential for agricultural activities. There are also no programs that would conflict with existing agricultural zoning or a Williamson Act contract. In addition, because the City does not contain forest land, there is no rezoning or development proposed on forest land, or land or timber property zoned as Timberland Production.

The new Public Health, Safety, and Environmental Justice Element includes updated goals and policy information related to natural and public health and hazards information. The Public Health, Safety, and Environmental Justice Element does not propose any policies or actions that would result in negative impacts to agricultural and forestry resources, as there is no land within the City that is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the Los Angeles County Important Farmland map. However, the Public Health, Safety, and Environmental Justice Element does encourage the promotion of urban agriculture (Action 6.1b), which would result in beneficial impacts to the community. As such, based on the above, updates to the Housing Element and Public Health, Safety, and Environmental Justice Element would have no impacts upon agricultural and forestry resources.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–c: Less Than Significant Impact. d: No Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The City lies within the South Coast Air Basin (SCAB), and the South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the SCAB and is responsible for measuring the air quality of the region. The SCAB is designated as a nonattainment area for federal and state O_3 standards and federal and state $PM_{2.5}$ standards. The SCAB is designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO_2 standards, and federal and state SO_2 standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard

The Housing Element Update would not conflict with or obstruct implementation of the State Implementation Plan by the SCAQMD because the growth anticipated in the Housing Element Update (RHNA allocation) is consistent with SCAG's growth projections that were also factored into the Regional Air Quality Strategy. The Housing Element Update would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, nor would it result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Additionally, the Housing Element Update would not expose sensitive receptors to substantial pollutant concentrations, specifically because, with the adoption of the Public Health, Safety, and Environmental Justice Element, as discussed below, goals and policies are included therein to protect residents from exposure to pollutant concentrations. Lastly, because the Housing Element Update does not affect land uses that are typically associated with the creation of objectionable odors (such as rendering plants, landfills, treatment plants, etc.), its adoption would have no impact from odors.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update incorporates the following goals and policies specifically related to air quality and its effects on City residents:

Goal 1: Protect the health of community members by improving air quality.

Policy 1.1: Reduce air pollution from mobile sources.

Policy 1.2: Reduce localized air pollution exposure near major roads.

Goal 2: Promote a built environment that stays cool.

Policy 2.1: Promote a healthy urban forest to reduce air pollution and extreme heat.

Policy 2.2: Adopt policies and standards for the built environment that reduce urban heat island.

Goal 5: Improve the quality of the built and natural environments to reduce disparate health and environmental impacts.

Policy 5.1: Adopt land use regulations that protect residential and park uses from the impacts of industrial and roadway pollution.

Policy 5.2: Remediate and prevent pollution arising from industrial and household sources.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on air quality, and with implementation of the goals and policies in the Public Health, Safety, and Environmental Justice Element, as identified above, could improve air quality and its effects on City residents.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–f: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of sensitive species habitat, riparian habitat, a sensitive natural community, federally protected wetlands, or wildlife corridors or nursery sites. In the event that any biological resources, habitat or trees would be affected, proper mitigation would be implemented, on a project-by-project basis.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. Policies are included within the plan that would actually protect and enhance biological resources in the City; these include the following:

Goal 2: Promote a built environment that stays cool.

Policy 2.2: Promote a healthy urban forest to reduce air pollution and extreme heat.

Action 2.1a: Climate-Appropriate Trees. Develop a new street tree species palette that prioritizes trees based on having low water needs and adaptability to climate change and future environmental conditions.

Action 2.1b: Diverse Urban Forest. Maintain a healthy urban forest by ensuring a diversity of tree species.

Action 2.1c: Increase the Tree Canopy. Identify grant funding to develop a program to install additional street trees or provide canopy trees to residents for planting.

Goal 5: Improve the quality of the built and natural environments to reduce disparate health and environmental impacts.

Therefore, while adoption of the Public Health, Safety, and Environmental Justice Element would not, in itself, produce environmental impacts, adoption would result in the implementation of goals and policies designed to minimize impacts to biological resources.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–c: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Additionally, per the Resources Element of the City's General Plan, no historic or archaeologically significant sites have been located in the City.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. Therefore, its adoption would not, in itself, produce environmental impacts.

The Housing Element and Public Health, Safety, and Environmental Justice Element Updates would not change or alter policies to protect and/or review cultural resources. Therefore, impacts are less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – 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?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–b. No Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. However, future development would be required to adhere to all state and/or local plans for renewable energy or energy efficiency.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element does not propose any policies or actions that would result in impacts to energy.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would result in less than significant impacts associated with energy.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – 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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–f: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental

impacts. Implementation of the programs contained in the document would accommodate development required to meet City's RHNA allocation.

Areas with seismic (earthquake) hazards are identified by earthquake fault zones as established by the Alquist-Priolo Earthquake Fault Zone Act of 1972. The California Geological Survey (CGS; formerly the California Division of Mines and Geology [CDMG]) classifies faults as active, potentially active, or inactive according to standards developed for implementation of the Alquist-Priolo Earthquake Fault Zone Act. A fault that has exhibited surface displacement within the Holocene Epoch (the last 11,000 years) is defined as active. A fault that has exhibited surface displacement during Quaternary time (i.e., within the past 1.6 million years) but that cannot be proven to have moved or not moved during Holocene time is defined as potentially active.

a: According to the City's existing Public Health and Safety Element, like most areas throughout Southern California, Highland is susceptible to seismic hazards (City of Highland 2006). The San Andreas fault zone traverses the northern part of the City and while the San Jacinto fault does not run through any part of the City it is nearby to the west. The seismic setting of Highland and surrounding areas is dominated by the San Andreas Fault. Several "active" and "potentially active" faults of the San Andreas Fault are present within and nearby Highland. North and south branches of the San Andreas Fault run through Highland. The last major earthquake along the south branch of the San Andreas was the 1857 Fort Tejon earthquake, estimated at a Richter magnitude of 8.0 plus. The San Andreas Fault is capable of generating an earthquake magnitude of up to 8.3 on the Richter scale. Located approximately 4.5 miles southwest of Highland, the San Jacinto Fault Zone has a maximum credible earthquake Richter magnitude of 8.5 and has the potential for significant ground shaking within the region. Despite the potential of the San Andreas fault system to produce severe ground shaking in the City, no significant impact regarding fault hazards would occur, because the Housing Element Update would be consistent with the other elements of the General Plan, including the Safety Element. Additionally, the potential for significant adverse impacts to result from these phenomena would be substantially reduced through adherence to requirements specified in the Alquist-Priolo Act, the Uniform Building Code, Title 24 of the California Building Code, and all development regulations of the City. Compliance with these building standards would minimize impacts associated with seismic hazards. Additionally, the following goals and policies are included in the Public Health, Safety, and Environmental Justice Element to address disaster preparedness and recovery:

Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.

Policy 3.5: Enforce development standards to reduce geologic risk.

Goal 4: Maintain adequate emergency preparedness and response capabilities.

Policy 4.1: Create culturally appropriate hazard preparation and education.

Policy 4.2: Create resilience centers throughout highland.

Policy 4.4: Ensure the Emergency Operations Center (EOC) has adequate capacity to respond to hazard events.

b–e: Most lowland areas with relatively level ground surface are not prone to landslides. Other forms of slope instability are also unlikely to occur except along stream banks and terrace margins. The highland areas are more susceptible to slope instability. The strong ground motion that occurs during earthquakes is capable of inducing

landslides and debris flow (mudslides). These types of failure generally occur where unstable slope conditions already exist. The City has in place geologic review procedures to address these hazards. Hillside areas with landslide potential are of particular concern, and slope stability requires appropriate treatment of vegetative cover during and after residential development. The City's General Plan and zoning designations do not prohibit new development on areas of geologic hazard; however, many precautionary recommendations and restrictions are established in the policies and Municipal Code in order to minimize potential impacts from developing on geologically hazardous land or resulting in substantial soil erosion (City of Highland 2006). City regulations and policies cover landslides, seismic shaking, surface rupture, seiches, liquefaction, subsidence, expansive soils, and soil erosion. All new development is required to be consistent with these regulations.

f: Depending on the location, future development in the City has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The existing General Plan contains policies for the protection of paleontological resources, and all new development must be consistent with these policies. The Housing Element Update would not change or alter these policies.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element as proposed includes updated goals and policies that support the reduction of impacts related to natural hazards, including those associated with geologic conditions (e.g. ground shaking, liquefaction, lateral spreading, etc.). Specifically, these include the following:

Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.

Based on the above, the Housing Element Update and the Public Health, Safety and Environmental Justice Element Updates. Element would result in less than significant impacts associated with geology and soils.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact.

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth. Without the greenhouse effect, the earth would not be able to support life as we know it.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. According to the U.S. Environmental Protection Agency, the burning of fossil fuels, along with deforestation and other activities, has caused the concentrations of heat-trapping greenhouse gases (GHGs) to increase significantly in the earth's atmosphere (U.S. Environmental Protection Agency 2021). The increase in GHGs results in global warming, as more heat is trapped in the atmosphere. Given the already built-out nature of the City and lack of substantial vacant land, future residential projects that may be developed to meet the RHNA requirement are expected to be located on infill sites where pedestrian- and transit-oriented development is highly feasible and would be encouraged. Such development should reduce the number of new vehicle trips typically associated with residential projects and, thus, would help reduce GHG production resulting from the combustion of fossil fuels for transportation purposes. Based on the above, the Housing Element Update would result in less than significant impacts associated with GHG emissions. New development projects will be required to comply with the Green Building Code, which also reduces GHG emissions.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element proposes the following updated goals and policies that would result in potential overall improvements to the City associated with GHG emissions:

Goal 1: Protect the health of community members by improving air quality.

Policy 1.1: Reduce air pollution from mobile sources.

Policy 1.2: Reduce localized air pollution exposure near major roads.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–c and e–g: No Impact. d: Less Than Significant Impact.

As defined in Chapter 6.95 of Division 20 of the California Health and Safety Code, Section 25501(o), a hazardous material is "...any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances,

hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment."

a–c: The Housing Element and Public Health, Safety, and Environmental Justice Element Updates are policy documents, and therefore, adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the updated Housing Element and Public Health, Safety, and Environmental Justice Element would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials. The Public Health, Safety, and Environmental Justice Element actually includes goals and policies specifically designed to reduce impacts from hazards to City residents and the environment. As such, no negative impacts would occur.

The Housing Element Update facilitates the development of new housing by creating a regulatory setting in which affordable housing can be developed. New housing units would not be constructed by the City but by private contractors with City approval. During construction of new housing units, construction equipment would require the use of fuel and petroleum-based lubricants and would require regular maintenance of equipment. Both the frequency of maintenance and the large volumes of fluids required to service the equipment increase the risk of accidental spillage. Any new units would be required to adhere to federal, state, and local regulations regarding handling hazardous materials and cleanup standards in case of a spill. New residential units may contain household hazardous materials such as paint, herbicides/pesticides, diesel fuel, and cleaning products that have the potential to spill. Residential uses typically do not use or store large quantities of hazardous materials. Adherence to regulations and standard protocols during the storage, transportation, and usage of any hazardous materials, as discussed above, would minimize and avoid the potential for significant upset and accident condition impacts. Following these standards and regulations at the time of future development would make impacts less than significant.

The Public Health and Safety Element does not include any new policies that would impact the routine transport, use, or disposal of hazardous materials, nor would it 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. The purpose of this element is to establish policies that would reduce the likelihood of hazards within the City's jurisdictional boundary. Therefore, the impact would be less than significant.

d: The Housing Element and Public Health, Safety, and Environmental Justice Element Updates are policy documents and adoption will not, in itself, result in negative environmental impacts. However, implementation of the programs contained in the document will accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time.

All sites of future residential projects will be evaluated using appropriate databases including the California Department of Toxic Substances Control EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects will be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted if and as necessary, in conformance with CEQA. As such, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would result in less than significant impacts.

e–g: The City of Highland has two airports within its SOI, the San Bernardino International Airport, located south of the southwestern portion of the City, and Redlands Municipal Airport, located south of the southeastern portion of the City. The City of Redlands adopted the Redlands Municipal Airport Land Use Compatibility Plan (LUCP) in 1997 and made amendments as recently as 2003. The San Bernardino International Airport does not currently have an adopted Airport Land Use Plan (ALUP). The Housing Element Update would not create additional residential opportunities in the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour for the Redlands Municipal LCUP or San Bernardino International Airport. Therefore, impacts would be less than significant.

The Public Health and Safety Element does not include any new policies that would result in a safety hazard or excessive noise for people residing or working in the City. The purpose of this element is to establish policies that would reduce the likelihood of hazards within the City's jurisdictional boundary. Therefore, the impact would be less than significant.

The Housing Element and Public Health, Safety, and Environmental Justice Element Updates would be consistent with General Plan policy. Within the Public Health, Safety, and Environmental Justice Element Update are details related to the City's emergency response plan to prepare for, and respond to, natural hazards including extreme heat, flooding, geologic hazards such as earthquakes, exposure to hazardous materials, and wildfires. Future development would be consistent with the City's emergency response plans related to risk from natural- and human-caused hazards. Goals and policies included in the Public Health, Safety, and Environmental Justice Element specifically related to hazards include the following;

Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.

- Policy 3.1: Minimize flooding risks through appropriate siting and protection of structures and occupants.
- Policy 3.3: Implement programs and standards to mitigate wildfire risk in high wildfire hazard severity zones.
- Policy 3.4: Ensure that public facilities and infrastructure have adequate capacity to respond to wildfires and other relevant hazard events.
- Policy 3.4: Enforce development standards to reduce geologic risk.
- Policy 3.6: Limit the potential hazards from the transportation and disposal of hazardous waste.

Goal 4: Maintain adequate emergency preparedness and response capabilities.

- Policy 4.1: Create culturally appropriate hazard preparation and education.

Policy 4.2: Create resilience centers throughout highland.

Policy 4.3: Prepare residential areas for flooding and wildfire.

Policy 4.4: Ensure the Emergency Operations Center (EOC) has adequate capacity to respond to hazard events.

Based on the above, the Housing Element and the Public Health, Safety, and Environmental Justice Element Updates would result in no negative impact on hazards or hazardous materials.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
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; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a, c–d: Less than Significant Impact. b and e: No Impact.

The Housing Element and Public Health, Safety, and Environmental Justice Element Updates are policy documents, consisting of a housing program and updates to the Public Health, Safety, and Environmental Justice Element to address new requirements in Environmental Justice and Safety Elements specifically related to environmental justice issues for socially disadvantaged residents, air pollution and extreme heat; no actual development or rezoning is proposed as part of the update. Therefore, adoption of these updates would not, in itself, produce negative environmental impacts. However, implementation of the programs contained in the documents would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality.

a: Per the East Valley Water District (EVWD) 2019 Sewer System Master Plan, wastewater collection and treatment is managed by the EVWD. All demolition, relocation and/or construction phases of future housing development would be subject to compliance with applicable local, regional, state and federal regulations designed to protect water resources, including those regulations requiring implementation of Best Management Practices (BMPs), preparation of Stormwater Pollution Prevention Plans (SWPPPs), and submittal of Erosion Control Plans in compliance with National Pollution Discharge Elimination System (NPDES) provisions. Consistency with this regulatory framework would adequately ensure that such impacts would be avoided or reduced to less than significant. The Housing Element Update would not generate a significant impact on water quality over current projections for population and housing units.

b: Water service in the City is provided by the EVWD. The EVWD's sole supply source is groundwater that is extracted at depths exceeding 600 feet from an aquifer known as Bunker Hill Basin. Groundwater from this basin has consistently met both State of California and the U.S. Environmental Protection Agency drinking water standards, and supply is projected to meet demand for the foreseeable future. However, energy requirements, drought and potential contamination will continue to put pressure on unlimited use of groundwater. Surface water is also available to the East Valley Water District through developable rights to local streams including the Santa Ana River, City Creek and Plunge Creek. Some of the flow from these sources is already diverted by other agencies or used for agricultural purposes. Access to this water is made possible, in part, by the EVWD's stock ownership in local irrigating companies.

The Conservation and Open Space Element as well as the proposed Public Health, Safety, and Environmental Justice Elements of the City's General Plan includes goals focused on protecting and preserving the water supply and water quality within the groundwater basin. Adoption of the General Plan Amendment for the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would not affect the City's ability to implement the water goals outlined within the Resources Element of the General Plan as no physical development is current proposed. Therefore, implementation of the Housing Element and Public Health, Safety, and Environmental Justice Element update would not deplete groundwater supplies. The Public Health, Safety, and Environmental Justice Element also includes the following goals and policies specifically related to groundwater supplies:

> Policy 3.2: Build and maintain public infrastructure that collects and conveys stormwater and enhances water quality.
>
> Policy 5.2: Remediate and prevent pollution arising from industrial and household sources

Goal 6: Green Streets. Prevent future groundwater pollution by implementing green street strategies to support a sustainable approach to stormwater, drainage, groundwater recharge, and landscaping, and incorporating green streets standard and guidelines in all streetscape improvements where feasible. Ensure access to healthy food.

c–d: City regulations prohibit new development that would create runoff volumes or velocities that may cause the City's existing drainage system to exceed its design capacity. In regard to risks due to dam or levee failure, the City is not located within an area that would be impacted by any dam or levee failure. Seiche and mudflow risk would also be negligible, as the City is not located near a large contained body of water or downslope from an unstable hillside. With regard to tsunami risk the City is not located within a mapped tsunami inundation area. The Public Health, Safety, and Environmental Justice Element also includes the following goals and policies specifically related to minimizing flood hazard risks:

Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.

> Policy 3.1: Minimize flooding risks through appropriate siting and protection of structures and occupants.
>
> Policy 3.2: Build and maintain public infrastructure that collects and conveys stormwater and enhances water quality.
>
> Policy 3.4: Ensure that public facilities and infrastructure have adequate capacity to respond to wildfires and other relevant hazard events.

Goal 4: Maintain adequate emergency preparedness and response capabilities.

> Policy 4.3: Prepare residential areas for flooding and wildfire.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would result in no impact or a less than significant impact on or from hydrology and water quality.

e: As stated above, the EVWD provides potable water to residences and businesses within the City. The Housing Element and Public Health, Safety, and Environmental Justice Element Updates would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan associated with the EVWD.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Public Health, Safety, and Environmental Justice Element Update does not propose any policies or actions that would result in negative impacts related to hydrology and water quality, and instead, as outlined above, includes goals and policies specifically designed to minimize risks from flood hazards.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on hydrology and water quality.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a: No Impact. b: Less than Significant.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. Although implementation of the programs contained in the document would encourage residential development required to meet the City's RHNA allocation, such residential projects are expected to be located on infill sites within existing neighborhoods, and because infill

sites are part of the existing urban fabric, projects developed on them would not be likely to physically divide an established community. The proposed update would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update does not propose any policies or actions that would result in physically dividing an existing community. Additionally, the Public Health, Safety, and Environmental Justice Element Update would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect. The intended purpose of the Public Health, Safety, and Environmental Justice Element is to guide land use decisions in such a way and natural- and human-caused hazards are avoided to maximum extent feasible.

Neither the Housing Element Update or Public Health and Safety Element Update propose policies that would encourage future projects that could divide an established community. The proposed locations for future housing within the Housing Element update are located within or adjacent to existing development. Future projects are subject to the General Plan and Zoning Code, which include standards to protect aesthetic quality and scenic viewsheds, biological resources, cultural resources, and public health and safety. Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on land use and planning.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–b: No Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is

not one of the discretionary actions being undertaken at this time. Although implementation of the programs contained in the document would encourage residential development required to meet the City's RHNA allocation, such residential projects are expected to be located on infill sites within existing neighborhoods, and because infill sites are part of the existing urban fabric, projects developed on them would not be likely to physically divide an established community. The proposed update would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect.

The City of Highland, due to its large washes and stream channels, contains regionally significant construction aggregate and mineral resources. The primary minerals found in the area are iron, decorative rocks, clay, limestone, sand and gravel. The City has identified Mineral Resource Zones (MRZs, Categories 1–3). If future development of housing units near areas that may be rich in mineral resources occurs, precautions would be taken regarding mineral resources. Goal 5.9 in the Conservation Element of the City's General Plan outlines policies that would be considered for future development specific to mineral resources. Therefore, with compliance of necessary policies and regulations, construction of housing units impact to mineral resources would be less than significant. The Public Health and Safety Element Update does not propose any polices that would result in the loss of mineral resources; therefore, there would be no impact associated with adoption of the Element.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on mineral resources.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. 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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact. c: No Impact.

Noise varies with time, geographic location, proximity to the source, and duration of the noise event. The effects of noise are considered in several ways: how a proposed project may increase existing noise levels, how those noise levels would affect surrounding land uses, and how a proposed land use may be affected by noise from existing and surrounding land uses. Certain land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure and the types of activities involved.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. The majority of such development is expected to be located on infill sites. The Housing Element Update does not propose specific development plans for new housing units. Future construction of housing units would be subject to policies and regulations regarding construction-related noise. The Noise Element and Chapter 21.60 (Noise) of the City's Zoning Ordinance includes noise reduction measures to be incorporated into construction, including the use of sound-control devices on equipment, avoiding idling equipment, and public notification of proposed construction activities. Limiting construction activities to daytime hours would minimize the effect on nearby residents. Noise related impacts should be reviewed for individual project proposals and compliance with applicable regulations would make potential impacts less than significant. Adherence to the City's Noise Ordinance would ensure that any such noise and vibration increases, both temporary and permanent, would result in less than significant impacts within project areas. No active airports are located within the City; as such, the City is not exposed to excessive aircraft noise.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural- and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update does not propose any policies or actions that would result in negative impacts related to noise.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on noise.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a–b: Less Than Significant Impact.

The Housing Element Update utilizes the 2021-2029 RHNA to plan for and accommodate population growth. Therefore, it would not induce population growth within the City. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. Future development would occur on vacant or underutilized sites. With the implementation of programs in the Housing Element Update to increase housing capacity, there would be adequate land available to accommodate the City's RHNA allocation. Therefore, the update would not necessitate the construction of replacement housing elsewhere (outside of the City) or result in environmental impacts related to growth. Based on the above, the Housing Element Update would result in a less than significant impact associated with population and housing.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update does not propose any policies or actions that would result in impacts related to population and housing.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on population and housing.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC 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 service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a(i–v): Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As a highly urbanized community, all of the residentially designated land in the City is served with sewer and water lines, streets, storm drains, and other infrastructure and utilities.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update does not propose any policies or actions that would 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 service ratios, response times, or other performance objectives for any of the public services.

The Housing Element and Public Health, Safety, and Environmental Justice Element Updates, therefore, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed above. These general plan updates would not change or impact standards, policies, programs and regulations in place that ensure adequate provision of public services. Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on public services.

Furthermore, the Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update proposes the policies that would result in beneficial impacts related to public services.

Goal 4: Maintain adequate emergency preparedness and response capabilities.

Policy 4.1: Create culturally appropriate hazard preparation and education.

Policy 4.2: Create resilience centers throughout highland.

Policy 4.3: Prepare residential areas for flooding and wildfire.

Policy 4.4: Ensure the Emergency Operations Center (EOC) has adequate capacity to respond to hazard events.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a-b: Less Than Significant Impact.

Park and recreation facilities are in short supply in the City, partly the result of a lack of developable space. For future planning, given a projected build-out population of 69,582, Highland should have approximately 143.8 acres of developed park acreage and 36 acres of undeveloped natural parkland, totaling 179 acres based on the standard of two acres of parkland per 1,000 residents. Highland's recreational facilities include: Central Avenue Park (17-acres), Aurantia Park (10-acres), Cunningham Park (2-acres), and Canyon Oaks Park (2-acres). The Jerry Lewis Community Center, consisting of a 30,000 square-foot multi-use facility containing a gymnasium, several multipurpose rooms, a kitchen and office is within Central Avenue Park (City of Highland 2021). Additional recreational needs of the City are met by the sports fields and playgrounds of the eight schools in the City, parks or schools in surrounding cities, vacant lots and a few privately held fields that serve as informal ball fields and gathering places.

The Housing Element Update is a policy document, consisting of a housing program. No specific recreational facilities or the construction or expansion of recreational facilities that might have an adverse physical effect on the environment are included in the Housing Element Update. Therefore, its adoption would not, in itself, produce environmental impacts. The Housing Element Update has the potential to increase the number of residents that would use public recreation facilities in the area. However, new development would be subject to development impact fees that would be put toward continued maintenance of the facilities. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. The availability, maintenance, and management of park and recreation facilities are covered under the General Plan and the Capital Improvement Program. Based on the above, the Housing Element Update would result in a less than significant impact on recreation.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update proposes the policies that would result in beneficial impacts related to recreation.

Goal 8: Ensure that parks, public facilities and services are equitably located and distributed throughout DACs, allowing easy access for residents.

Policy 8.1: Improve existing park quality by providing amenities and programs for play, exercise, and enhanced safety. Prioritize efforts should be deployed quickly in under-parked communities.

Policy 8.2: Expand park availability by converting underutilized land.

Policy 8.3: Create inviting public spaces in DACs where residents people feel safe to use during the day and night for everyday play, family gatherings, and community events.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on air quality, and with implementation of the goals and policies in the Public Health, Safety, and Environmental Justice Element, as identified above, could improve air quality and its effects on City residents.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–d: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. The development anticipated by the Housing Element would occur primarily on urban infill sites and consist primarily of multi-family and mixed-use development. Therefore, future development associated with implementation of the Housing Element Update would be expected to generate fewer vehicle miles traveled and more multi-modal trips than conventional development. Potential traffic impacts related to increased transportation system demands associated with specific future residential projects would be assessed at the time the projects are actually proposed using the vehicle miles traveled (VMT) methodology, consistent with state guidelines. Mitigation measures would then be adopted as necessary, in conformance with CEQA. The Housing Element Update would not increase hazards due to a design feature, result in inadequate emergency access, or conflict with adopted policies, plans, or programs supporting alternative transportation. Based on the above, the Housing Element Update would result in a less than significant impact on transportation/traffic.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The following policy is included within the Public Health, Safety, and Environmental Justice Element that would address adequacy of emergency access to City residents:

Goal 4: Maintain adequate emergency preparedness and response capabilities.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on transportation, and implementation of Policy 7.4 from the Public Health, Safety, and Environmental Justice Element would result in a beneficial transportation impact.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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:				
a) 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	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required

to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. The Housing Element Update would not change or alter policies to protect tribal cultural resources.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update would not change or alter policies to protect tribal cultural resources.

The City completed the tribal consultation process, consistent with the requirements of Senate Bill 18 and Assembly Bill 52. The City sent letters to tribes on June 18, 2021. The San Manuel Band of Mission Indians requested consultation. The City and San Manuel Band of Mission Indians met on July 6, 2021. The San Manuel Band of Mission Indians submitted email correspondence to the City on August 4, 2021 concurring with the findings that the project would not result in adverse effects to tribal cultural resources. The San Manuel Band of Missions Indians attached preferred language regarding mitigation measures for any future projects developed after adoption of the proposed project. Future new development will undergo future environmental review, as necessary, and the provided mitigation measures will be considered in that future process. The San Manuel Band of Mission Indians submitted email correspondence to the City on October 5, 2021 confirming that the tribe has no further comments at this time and that the consultation ended after the July 6 meeting with the City. Based on the outcome of the consultation process and on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would result in less than significant impacts to tribal cultural resources.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – 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?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Explanation of Checklist Judgements:

a–c and e: No Impact; d: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. Because the development anticipated by the Housing Element would occur primarily on infill sites already served by well-established utilities service systems, the need for the expansion of existing systems or the construction of new systems, in compliance with applicable statutes and regulations, would be less than significant.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update does not propose any policies or actions that would result in impacts related to utilities and service systems.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on utilities and service systems.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–d: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. Because the development anticipated by the Housing Element would occur primarily on infill sites identified outside of the High Fire Hazard Severity Zone the impacts associated with wildfire would be less than significant.

The Public Health, Safety, and Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Public Health, Safety, and Environmental Justice Element Update proposes updated goals, policies and actions that support the reduction of

impacts related to wildfire as well as response to hazardous conditions, including fires. Specifically, the following goals and policies are related to preparation for, response to, and recovery from wildfires:

Goal 3: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural and human-caused hazards.

Policy 3.3: Implement programs and standards to mitigate wildfire risk in high wildfire hazard severity zones.

Policy 3.4: Ensure that public facilities and infrastructure have adequate capacity to respond to wildfires and other relevant hazard events.

Goal 4: Maintain adequate emergency preparedness and response capabilities.

Policy 4.3: Prepare residential areas for flooding and wildfire.

Based on the above, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates would have a less than significant impact on wildfire.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☐	☒	☐
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)?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Explanation of Checklist Judgements:

a–c: Less Than Significant Impact.

As discussed throughout the above portions of the Initial Study/Negative Declaration, the Housing Element and Public Health, Safety, and Environmental Justice Element Updates are policy documents and adoption of these Element Updates alone would not produce environmental impacts. Although implementation of the programs contained in the Housing Element Update would accommodate development required to meet the City's RHNA allocation, the Housing Element does not identify, describe, promote, entitle, or permit any particular residential development project. While a rezoning program is identified within the Housing Element Update, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. The Public Health, Safety, and Environmental Justice Element Update is also a policy document that does not identify, describe, promote, entitle, or permit any particular development projects. Instead, however, the Public Health, Safety, and Environmental Justice Element sets forth goals, policies, and actions designed to prevent, prepare for, respond to, and recover from natural- and human-caused disasters.

The Housing Element and Public Health, Safety, and Environmental Justice Element Updates do not change the allowed densities or type of development that may occur within the City. The act of adopting the Housing Element and Public Health, Safety, and Environmental Justice Element Updates does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; historic resources; or human beings. As discussed in Sections 3.1 through 3.20 of this Initial Study/Negative Declaration, impacts associated with the adoption of these Element Updates would either result in no negative impacts, or less than significant impacts.

4 References and Preparers

4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Department of Forestry and Fire Protection (CAL FIRE), 2020. *California Fire Hazard Severity Zone Viewer.* Available at https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414. Accessed October 2020.

California Department of Toxic Substances Control (DTSC), 2020. EnviroStor Database. Available at https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Highland%2C+CA. Accessed October 2020.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

City of Highland, 2006. *City of Highland General Plan.* Adopted March 2006. Available at https://www.cityofhighland.org/191/General-Plan. Accessed in October 2020.

City of Highland, 2021. *City of Highland Municipal Code.* Last amended August 24, 2021. Available at https://www.codepublishing.com/CA/Highland/#!/HighlandNT.html. Accessed in October 2021.

City of Redlands, 1997. Redlands Municipal Airport Land Use Compatibility Plan. Adopted February 18, 1997, Last Amended May 6, 2003. Available at http://www.sbcounty.gov/Uploads/lus/Airports/Redlands.pdf. Accessed in October 2020.

City of Redlands, 1997. *Redlands Municipal Airport Land Use Compatibility Plan.* Adopted February 18,1997. Last revised May 6, 2003. Available at http://www.sbcounty.gov/Uploads/lus/Airports/Redlands.pdf. Accessed in October 2020.

County of San Bernardino, 2017. *San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan.* FEMA approved July 13, 2017. Available at http://cms.sbcounty.gov/portals/58/Documents/Emergency_Services/Hazard-Mitigation-Plan.pdf. Accessed in October 2020.

State Water Resources Control Board, 2020. GeoTracker Database, Safety-Kleen Corporation (T0607100369). Available at https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0607100369. Accessed October 2020.

REVISED DRAFT INITIAL STUDY/ NEGATIVE DECLARATION

CITY OF HIGHLAND GENERAL PLAN AMENDMENT: HOUSING ELEMENT, PUBLIC HEALTH, SAFETY & ENVIRONMENTAL JUSTICE ELEMENT, AND CIRCULATION ELEMENT

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DECEMBER 2021

1. Introduction

This document is the Revised Draft Initial Study/ Negative Declaration for the City of Highland General Plan Amendment: Housing Element, Public Health, Safety, and Environmental Justice Element, and Circulation Element. This document incorporates, by reference, the Draft Initial Study/ Negative Declaration for the City of Highland General Plan Amendment: Housing Element, Public Health, Safety, and Environmental Justice Element, dated October 2021 and outlines the additions to constitute the Revised Draft Initial Study/ Negative Declaration. As outlined in the California Environmental Quality Act (CEQA) Guidelines Section 15073.5 (c)(4), revisions to a negative declaration are not required to be recirculated if "new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration." The revisions added to the October 2021 Draft Initial Study/ Negative Declaration enclosed herein, include only minor deletions to the Circulation Element of the General Plan and constitute "insignificant modifications to the negative declaration," that do not identify any new significant environmental impacts. Revisions to add text to the Draft Initial Study/ Negative Declaration are shown in underline and removed text is shown in ~~strikethrough~~.

2. Project Description

In addition to the Draft Initial Study/ Negative Declaration for the City of Highland General Plan Amendment: Housing Element, Public Health, Safety, and Environmental Justice Element Project Description, the following addition is made in this Revised Draft Initial Study/ Negative Declaration for the following minor amendments to the Circulation Element of the City of Highland General Plan:

Page 3-31, ***Roadway Classification Consistency with Other Agencies***
San Bernardino County, the City of San Bernardino and the City of Redlands have different functional classifications for some of the roadway segments illustrated on the City of Highland proposed General Plan. The roadway segments with different functional classifications include:

- Del Rosa Drive between 3rd Street and Base Line;
- Del Rosa Avenue between 3rd Street and Pacific Street;
- Palm Avenue between Base Line and Pacific Street;
- 5th Street between Shirley Avenue and Palm Avenue;
- Base Line between Church Avenue and Boulder Avenue
- 3rd Street between Sterling Avenue and Church Avenue;
- Boulder Avenue between Highland Avenue and Orange Street
- ~~Cone Camp Road extension, and~~
- ~~Greenspot Road extension to Bryant Avenue.~~

Table 3.3 shows the roadway segments with different functional classifications among different jurisdictions.

Page 3-32, ***Table 3.3: General Plan Circulation Element Comparison***

Table 3.3: General Plan Circulation Element Comparison

Street	From	To	City of Highland General Plan Designation	City of SB General Plan Designation	City of Redlands General Plan Designation	County of SB General Plan Designation
Del Rosa Drive	3rd Street	Base Line	Secondary Highway (4D)	Major Arterial (6D)	N/A	Major Highway (4D)
Del Rosa Avenue	3rd Street	Base Line	Collector Street (2U)	Not Shown	N/A	Secondary Highway (4U)
Palm Avenue	Base Line	Pacific Street	Special Collector (2U)	Major Arterial (6D)	N/A	Major Highway (4D)
5th Street	Shirley Avenue	Palm Avenue	Major Highway (4D)	Major Arterial (6D)	N/A	Major Highway (4D)
Base Line	Church Avenue	Boulder Avenue	Primary Arterial (6D)	Major Arterial (6D)	N/A	Major Highway (4D)
3rd Street	Sterling Avenue	Church Avenue	Major Highway (4D)	Major Arterial (6D)	N/A	Not Proposed
Boulder Avenue	Highland Avenue	Orange Avenue	Modified Primary Arterial (6D)	Major Arterial (6D)	Minor Arterial (4D)	Major Highway (4D)
~~Cone Camp Road Extension~~			~~Collector Street (2U)~~	~~N/A~~	~~Not Proposed~~	~~N/A~~
~~Greenspot Extension to Bryant Street~~			~~Special Secondary Highway (2D)~~	~~N/A~~	~~Not Proposed~~	~~N/A~~

Numbers of lanes per designation are identified in parentheses, e.g., (4D); "D" or "U" indicates whether the roadway is divided or undivided.
N/A – Not Applicable

Figure 3-2 Roadway Network
Revised to remove Cone Camp Road, south of Greenspot Road, and to remove Special Secondary Highway south and east of Greenspot Road and the Santa Ana River to Bryant Street.

Insert Revised GP page 3-32, Table 3.3

Intergovernmental Coordination

With a freeway and an adjacent international airport, Highland plays a significant role in the regional circulation network. As such, the City must actively coordinate with a variety of regional and subregional plans and state, regional and local agencies as described in the Introduction section of this element. Some of the key issues facing Highland that will require continuing coordination include the following.

Roadway Classification Consistency with Other Agencies

San Bernardino County, the City of San Bernardino and the City of Redlands have different functional classifications for some of the roadway segments illustrated on the City of Highland proposed General Plan. The roadway segments with different functional classifications include:

- Del Rosa Drive between 3rd Street and Base Line;
- Del Rosa Avenue between 3rd Street and Pacific Street;
- Palm Avenue between Base Line and Pacific Street;
- 5th Street between Shirley Avenue and Palm Avenue;
- Base Line between Church Avenue and Boulder Avenue;
- 3rd Street between Sterling Avenue and Church Avenue;
- Boulder Avenue between Highland Avenue and Orange Street;
- ~~Cone Camp Road extension; and~~
- ~~Greenspot Road extension to Bryant Avenue.~~

Table 3.3 shows the roadway segments with different functional classifications among different jurisdictions.

Completion of I-210/SR-30

The construction connecting I-210 with SR-30 will be completed by the end of 2007. The regional long-range projections indicate that SR-30 through Highland will need to be widened to six lanes. Measure I, which has been reauthorized for 30 additional years, includes a widening project for SR-30 from I-215 to I-10. The SR-30 widening will include an additional general use lane in each direction. Further coordination with SANBAG and Caltrans will be needed in ensure the timely implementation of the I-210 and SR-30 project.

Table 3.3: General Plan Circulation Element Comparison

Street	From	To	City of Highland General Plan Designation	City of SB General Plan Designation	City of Redlands General Plan Designation	County of SB General Plan Designation
Del Rosa Drive	3rd Street	Base Line	Secondary Highway (4D)	Major Arterial (6D)	N/A	Major Highway (4D)
Del Rosa Avenue	3rd Street	Pacific Street	Collector Street (2U)	Not Shown	N/A	Secondary Highway 4U)
Palm Avenue	Base Line	Pacific Street.	Special Collector Street (2U)	Major Arterial (6D)	N/A	Major Highway (4D)
5th Street	Shirley Avenue	Palm Avenue	Major Highway (4D)	Major Arterial (6D)	N/A	Major Highway (4D)
Base Line	Church Avenue	Boulder Avenue	Primary Arterial (6D)	Major Arterial (6D)	N/A	Major Highway (4D)
3rd Street	Sterling Avenue	Church Avenue	Major Highway (4D)	Major Arterial (6D)	N/A	Not Proposed
Boulder Avenue	Highland Avenue	Orange Street	Modified Primary Arterial (6D)	Major Arterial (6D)	Minor Arterial (4D)	Major Highway (4D)
~~Cone Camp Road Extension~~			~~Collector Street (2U)~~	~~N/A~~	~~Not Proposed~~	~~N/A~~
~~Greenspot Extension to Bryant Street~~			~~Special Secondary Highway (2D)~~	~~N/A~~	~~Not Proposed~~	~~N/A~~

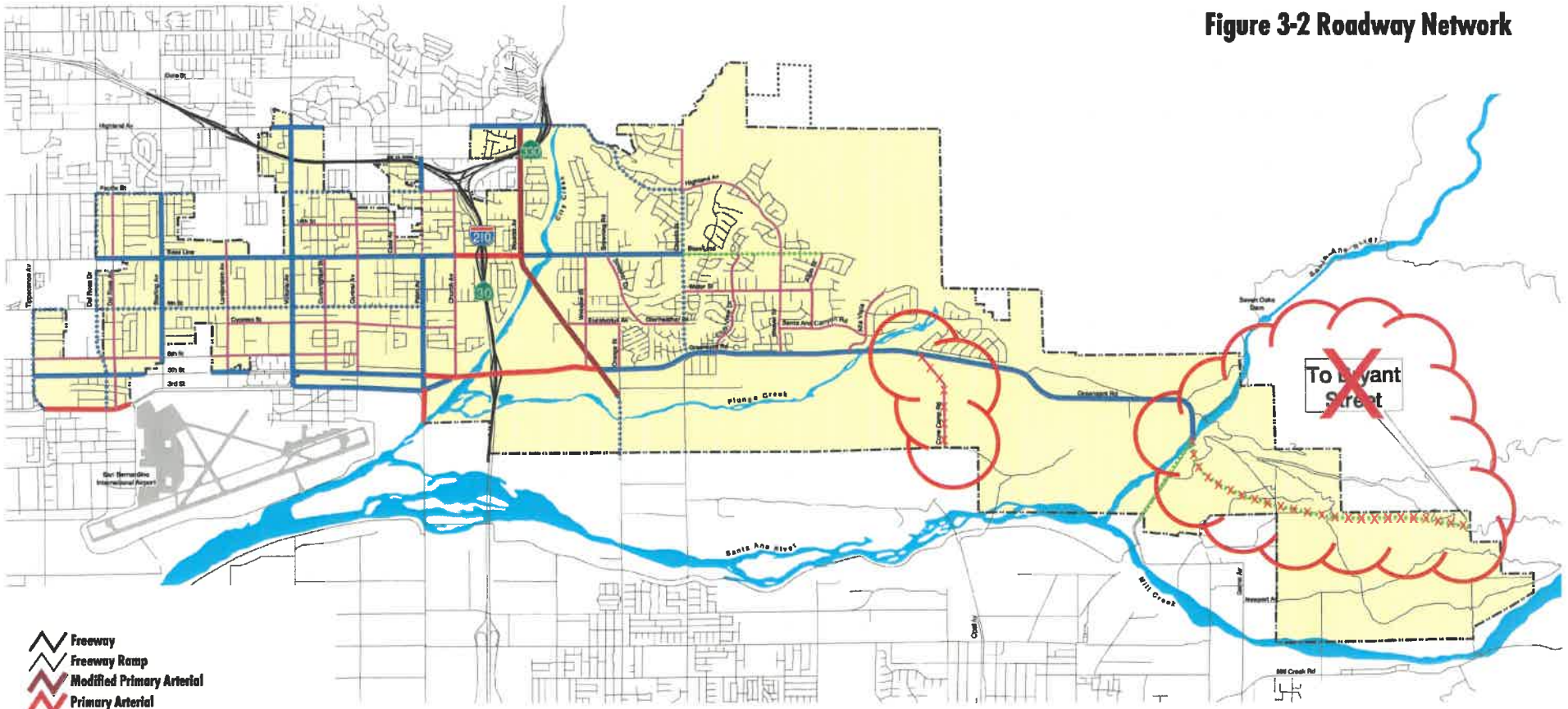
Numbers of lanes per designation are identified in parentheses, e.g., (4D); "D" or "U" indicates whether the roadway is divided or undivided.
N/A – Not Applicable

Victoria Avenue and the Potential Interchange

Identified as the major entryway into the San Bernardino International Airport and serving as the linkage between the Airport and San Manuel Indian Casino and Bingo facility, Victoria Avenue serves as a potential new interchange for I-210. Additional study is necessary to determine the feasibility of the interchange, its potential configuration and right-of-way requirements, the possible deletion of the existing ramps along Arden Avenue, and the impact to the nearby arterial roadway systems. To preserve adequate rights-of-way for the Airport entry and accommodate future traffic, Victoria Avenue is planned as a Major Highway on the Circulation Map. Future study will require coordination with Caltrans, SANBAG, the City of San Bernardino, the San Bernardino International Airport Authority, the San Manuel Band of Mission Indians, and the County of San Bernardino.

Insert Revised GP Figure 3-2 Roadway Network

Figure 3-2 Roadway Network



City of Highland General Plan

3. Initial Study Checklist

EVALUATION OF ENVIRONMENTAL IMPACTS

1. AESTHETICS.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☑
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☑
c) In non-urbanized areas, 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?	☐	☐	☐	☑
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☑

Explanation of Checklist Judgements:

a-d. **No Impact**: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to scenic resources within a state highway. No aesthetic impacts would occur from the adoption of this amendment.

2. AGRICULTURE AND FORESTRY RESOURCES.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

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 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?	☐	☐	☐	☑
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☑
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))? ?	☐	☐	☐	☑
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☑
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?	☐	☐	☐	☑

Explanation of Checklist Judgements:

a-e. **No Impact:** The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to Farmland, forest land or timberland. No agricultural or forestry impacts would occur from the adoption of this amendment.

3. AIR QUALITY.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☑	☐
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?	☐	☐	☑	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
d) Result in other emissions (such as those leading to odors affecting a substantial number of people?	☐	☐	☐	☑

Explanation of Checklist Judgements:

a-c. Less than Significant Impact. d: No Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to air quality. No air quality impacts would occur from the adoption of this amendment.

4. BIOLOGICAL RESOURCES. Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☑	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☑	☐
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?	☐	☐	☑	☐
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?	☐	☐	☑	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☑	☐
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?	☐	☐	☑	☐

Explanation of Checklist Judgements:

4a-f. Less than Significant Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to biological resources. No biological

resource impacts would occur from the adoption of this amendment.

5. CULTURAL RESOURCES.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☑	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☑	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☑	☐

Explanation of Checklist Judgements:

5a-c. Less than Significant Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to cultural resources. No cultural resource impacts would occur from the adoption of this amendment.

6. ENERGY.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☑
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☑

Explanation of Checklist Judgements:

6a-b. No Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in consumption of energy. No energy impacts would occur from the adoption of this amendment.

7. GEOLOGY AND SOILS. Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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.	☐	☐	☑	☐
ii) Strong seismic ground shaking?	☐	☐	☑	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☑	☐
iv) Landslides?	☐	☐	☑	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑	☐
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-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☑	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2001), creating substantial direct or indirect risks to life or property?	☐	☐	☑	☐
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?	☐	☐	☑	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☑	☐

Explanation of Checklist Judgements:

7a-f. Less than Significant Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to from geologic or soil hazards. No geology or soils impacts would occur from the adoption of this amendment.

8. GREENHOUSE GAS EMISSIONS.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☑	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☑	☐

Explanation of Checklist Judgements:

8a-b Less than Significant Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in greenhouse gas emissions. No greenhouse gas impacts would occur from the adoption of this amendment.

9. HAZARDS AND HAZARDOUS MATERIALS.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☑
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?	☐	☐	☐	☑
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☑
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?	☐	☐	☑	☐

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?	☐	☐	☐	☑
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☑
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☑

Explanation of Checklist Judgements:

9a-c and e-g: No Impact. d: Less Than Significant Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts related to hazards and hazardous materials. No hazard or hazardous impacts would occur from the adoption of this amendment.

10. HYDROLOGY AND WATER QUALITY.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☑	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☑
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would;	☐	☐	☑	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☑	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☑	☐

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; or	☐	☐	☑	☐
iv) impede or redirect flood flows?	☐	☐	☑	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☑	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☑

Explanation of Checklist Judgements:

10a,c-d: Less than Significant Impact. b and e: No Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to hydrology or water quality. No hydrology or water quality impacts would occur from the adoption of this amendment.

11. LAND USE AND PLANNING.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☑
b) Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑	☐

Explanation of Checklist Judgements:

11a: No Impact. b: Less than Significant. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to physically dividing an existing community and would have less than significant impacts related to conflict with any land use plan, policies, or regulations for avoiding environmental effects. Less than significant impacts would occur from the adoption of this amendment.

12. MINERAL RESOURCES.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☑
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?	☐	☐	☐	☑

Explanation of Checklist Judgements:

12a-b No Impact: The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in the loss of availability of mineral resources. No mineral resource impacts would occur from the adoption of this amendment.

13. NOISE.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☑	☐
b) Generation of excessive groundbourne vibration or groundborne noise levels?	☐	☐	☑	☐
c) For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☑

Explanation of Checklist Judgements:

13a-b: Less Than Significant Impact. c: No Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in the generation of noise or groundborne vibration. No noise impacts would occur from the adoption of this amendment.

14. POPULATION AND HOUSING.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**

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)?	☐	☐	☑	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☑	☐

Explanation of Checklist Judgements:

14a-b: Less than Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would induce population growth. No population and housing impacts would occur from the adoption of this amendment.

15. PUBLIC SERVICES.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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 service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☑	☐
b) Police protection?	☐	☐	☑	☐
c) Schools?	☐	☐	☑	☐
d) Parks?	☐	☐	☑	☐
e) Other public facilities?	☐	☐	☑	☐

Explanation of Checklist Judgements:

15a(i-v): Less than Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to the need for public services. No public services impacts would occur from the adoption of this amendment.

16. RECREATION.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☑	☐
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?	☐	☐	☑	☐

Explanation of Checklist Judgements:

16a-b: Less than Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in increased use of recreational facilities. No recreation impacts would occur from the adoption of this amendment.

17. TRANSPORTATION.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☑	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	☐	☐	☑	☐

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☑	☐
d) Result in inadequate emergency access?	☐	☐	☑	☐

Explanation of Checklist Judgements:

17a-d: Less the Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment would result in less than significant impacts related to the circulation system, generation of vehicle miles traveled, increase hazards or result in inadequate emergency access. Less than significant impacts related to transportation would occur from the adoption of this amendment.

18. TRIBAL CULTURAL RESOURCES.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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:				
a) 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	☐	☐	☑	☐
b) 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.	☐	☐	☑	☐

Explanation of Checklist Judgements:

18a-b: Less than Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes and would result in less than significant impacts to tribal cultural resources. Less than significant impacts related to tribal cultural resources would occur from the adoption of this amendment.

19. UTILITIES AND SERVICE SYSTEMS.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☑

b) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☑
c) Result in a determination by the wastewater treatment provider, which serves or may serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☑
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?	☐	☐	☑	☐
e) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☑

Explanation of Checklist Judgements:

19a-c and e: No Impact. d: Less than Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not include changes that would result in impacts to the need for new or expanded utilities, water supply, wastewater treatment capacity, or conflict with regulations related to solid waste. The Circulation Element amendment would have less than significant impacts related to the generation of solid waste. Less than significant impacts related to utilities and services systems would occur from the adoption of this amendment.

20. WILDFIRE.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☑	☐
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?	☐	☐	☑	☐
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?	☐	☐	☑	☐

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?	☐	☐	☑	☐

Explanation of Checklist Judgements:

20a-d: Less Than Significant Impact. The minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment would result in less than significant impacts related to wildfire. Less than significant impacts to wildfire would occur from the adoption of this amendment.

21. MANDATORY FINDINGS OF SIGNIFICANCE.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☑	☐
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)?	☐	☐	☑	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☑	☐

Explanation of Checklist Judgements:

21a-c: Less than Significant Impact. As discussed throughout the above portions of the Initial Study/Negative Declaration, the minor amendment to the Circulation Element would not produce environmental impacts. The Circulation Element amendment would have no actual development, rezoning, or construction. The Circulation Element amendment does not, therefore, have the potential to result environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; historic resources; or human beings. As discussed in 3.1 through

3.20 of this Initial Study/Negative Declaration, impacts associated with the adoption of the Circulation Element amendment would either result in no negative impacts, or less than significant impacts.

DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☑ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Kim Stater 12-29-21

Kim Stater, Assistant Community Development Director — Date

ATTACHMENT 5

Resolution No. 2021 - ___

Recommending the City Council approve

General Plan Amendment 21-003

RESOLUTION NO. 2022 - ____

A RESOLUTION OF THE PLANING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, RECOMMENDING THE CITY COUNCIL APPROVE GENERAL PLAN AMENDMENT NO. GPA-21-003 TO AMEND THREE (3) ELEMENTS OF THE HIGHLAND GENERAL PLAN INCLUDING ADOPTION OF THE SIXTH (6TH) CYCLE 2021-2029 HOUSING ELEMENT, UPDATE TO THE PUBLIC HEALTH, SAFETY AND ENVIRONMENTAL JUSTICE ELEMENT, AND MINOR AMENDMENT TO THE CIRCULATION ELEMENT

APPLICANT: CITY OF HIGHLAND

RECITALS

WHEREAS, Section 65302 of the California Government Code directs all cities and counties to prepare General Plans;

WHEREAS, the General Plan as amended will comprise of an integrated, internally consistent and compatible statement of policies for the City of Highland;

WHEREAS, the City of Highland has determined it is appropriate and necessary to adopt an updated 6th Cycle 2021-2029 Housing Element in accordance with State Housing Law, California Government Code Sections 65585-6588;

WHEREAS, Section 65302 of the Government Code requires planning agencies to review and, if necessary, revise the Safety Element upon each revision of the housing element or local hazard mitigation plan, to identify new information relating to flood and fire hazards and climate adaptation and resiliency strategies that was not available during the previous revision of the safety element;

WHEREAS, an Environmental Justice Element is required to be adopted by Highland because it is "Disadvantaged Community (DAC)", identified by the California Environmental Protection Agency as an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation;

WHEREAS, during the review of the City's Health and Safety Element, it was found that certain street extensions identified in the Circulation Element were found to be obsolete and should be deleted including extensions of Cone Camp Road to the City of Redlands and Greenspot Road to the City of Yucaipa;

WHEREAS, the public participation in the development of the amended General Plan included provisions of notice of public hearings pursuant to State Law; and

WHEREAS, a duly noticed public hearing was held before the Planning Commission on January 4, 2021, at which time all parties were given the opportunity to be heard; and

WHEREAS, based upon the State Guidelines to Implement the California Environmental Quality Act (CEQA), General Plan Amendment No. 21-003 will not have a significant impact upon the environment and, therefore the Planning Commission recommends the City Council adopt a Negative Declaration; and

WHEREAS, the project proponent is the City of Highland, 27215 Base Line, Highland, CA 92346.

NOW THEREFORE BE IT RESOLVED it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

SECTION 1. The Planning Commission finds that all the facts set forth in the Recitals above are true and correct.

SECTION 2. Based upon substantial evidence presented to the Planning Commission during the January 4, 2022, Public Hearing including public testimony and written and oral Staff Reports, the Planning Commission finds as follows:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

SECTION 3. General Plan Amendment Findings (Highland Municipal Code Section 16.08.030.G):

a. The proposed amendment is consistent with the goals, objectives, policies, and programs of the general plan, or the general plan as revised by the proposed amendment, and will not result in any internal inconsistencies within the plan;

Response: As proposed, the Amendment will include updates to the Housing Element, Health, Safety and Environmental Element, and a minor amendment to the Circulation Element. The 6th Cycle 2021-2029 Housing Element, as mandated by the California Government Code, addresses the comprehensive housing needs in the City by providing an analysis of the local housing needs for all income levels, details barriers to providing housing and strategies for meeting housing needs. The Health, Safety and Environmental Justice Element helps prioritize actions that address the greatest health risks to the City and ensures that people have access to healthy food and recreate while concurrently

addressing the affect to Disadvantaged Communities. These updates work in conjunction with, and compliment the remaining elements of the General Plan, especially the Conservation and Land Use Elements. All aspects of the General Plan and all of its mandatory and optional elements were reviewed in conjunction with the update. The mandatory finding of consistency is included within the Housing Element. The minor modification to the Circulation Element will delete obsolete regional connector that is no longer needed in Highland nor desired by adjacent Cities and further compliment the coordination of the Health, Safety and Environmental Justice Element and Circulation Element.

b. The proposed amendment will not adversely affect the public health, safety, or general welfare;

Response: The project is a policy document of the City. No development is proposed or approved as part of the General Plan Amendment. The Element updates, in particular the Public Health, Safety and Environmental Justice Element update, directly study and identify goals to improve public health, safety and general welfare of Highland residents. The Element analyzes and identifies hazards such as wildfire, air pollution, hazardous waste sites, extreme heat, emergency events, flooding and landslides. Goals and policies are established so that future development improves the existing conditions and addresses new legislation.

c. The proposed amendment is consistent with the purposes and intent of this title, unless such amendment proposes to change, supplement, or alter any part of this title, whereas said amendment must be consistent with all applicable sections including these findings; and

Response: Amendments to the three (3) identified Elements were drafted in coordination with the intent of the title to provide a comprehensive, long-term plan for the physical development of the City as an integrated, internally consistent set of policies. The Housing Element includes an analysis and finding of consistency with the General Plan as mandated by the Housing Element Law. All mandated and optional Elements of the Highland General Plan were reviewed in conjunction with the project.

d. The potential environmental impacts of the proposed amendment are insignificant or there are overriding considerations which outweigh the potential impacts.

Response: *The project consists of a policy document and does not involve physical development or rezoning. Pursuant to the California Environmental Quality Act (CEQA) an Initial Study was prepared for the project. All potential impacts were found to have a Less than Significant Impact or No Impact. A Negative Declaration is the appropriate finding for this project and included in the project documents for review and approval.*

SECTION 4. The Planning Commission hereby finds that the Initial Study and Negative Declaration has been prepared in compliance with the California Environmental Quality Act (CEQA), and the Planning Commission has reviewed and considered the information contained in said Negative Declaration with respect to the General Plan Amendment identified in this Resolution.

SECTION 5. Pursuant to California Government Code Section 65351, during preparation of an amendment to the General Plan, the Planning Agency provided opportunities for the involvement of citizens, public agencies, civic, educational, and other community groups, through public hearings and other means the City deemed appropriate.

SECTION 6. Based on the foregoing Findings, the Planning Commission recommends the City Council approve the General Plan Amendment No. 21-003.

C. ADOPTION OF RESOLUTION

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

Passed, Approved, and Adopted this 4th day of January, 2022.

_____

Randall Hamerly, Chairman
Planning Commission

ATTEST:

_____

Lawrence A. Mainez
Community Development Director

City of Highland

6th Cycle Housing Element Update

Public Review Draft

(2021-2029)

Housing Element

Introduction

The Housing Element of the General Plan addresses the comprehensive housing needs in the City of Highland (City) for the 8-year planning period (2021–2029). It provides an analysis of the local housing needs for all income levels, details barriers to providing needed housing, and identifies a set of strategies for meeting the housing need within the planning period. Housing Elements are one of eight required components of a General Plan and are guided by State law, which requires all local governments to update their Housing Elements every 8 years. This is the 6th update to the City of Highland Housing Element (6th Cycle).

The Housing Element is a strategic vision and policy guide designed to help address the comprehensive housing needs of the City over an 8-year period (2021–2029 planning period). It defines the City's housing needs, identifies the barriers or constraints to providing needed housing, and provides policies to address these housing needs and constraints.

Recent amendments to housing and planning laws aim to address California's housing shortage, placing a substantial number of new requirements on the 6th Cycle Housing Element. Housing in California has become some of the most expensive in the nation, ranking 49th out of 50 states in homeownership rates and the supply of housing per capita. Only half of California's households are able to afford the cost of housing in their local regions, and every county and city across the State is required by law to adequately plan for their fair share of needed housing.

The City must adequately plan for its existing and projected housing needs, including its share of the Regional Housing Needs Allocation (RHNA), as identified by the State with input from the Southern California Association of Governments and local cities and counties. While the City does not build housing on property that is privately owned or owned by other government agencies, the State requires each local government to demonstrate where housing can reasonably be expected to be added within this cycle, and how the City will facilitate and incentivize its production. As identified by the 6th Cycle RHNA, the City must plan for 2,513 housing units, which are further broken down by income level.

The City's 6th Cycle RHNA targets are broken down by income level as follows:

- Extremely Low-Income = 309
- Very Low Income = ~~619~~ 310 units
- Low Income = 409 units
- Moderate Income = 471 units

Housing Element Organization

The Housing Element identifies goals, policies, and programs to comprehensively address the housing needs of all current and anticipated residents at all income levels over the upcoming housing period from 2021 through 2029. The Housing Element is divided into chapters, and supporting documentation is included as appendices of the Housing Element.

Housing Element Content

- **Introduction** provides an overview of the Housing Element, its relationship to State law, the City's RHNA, and a section on the Housing Element's organization.
- **Public Engagement** describes the outreach process that was undertaken throughout the Housing Element update process, and the input received that informed the development of the Housing Element.
- **General Plan Consistency** details those policies identified throughout the elements of the General Plan that guided the policies set forth in the Housing Element to ensure that consistency is maintained throughout the General Plan.
- **Goals and Policies** specifies the City's plans for meeting the existing and projected comprehensive housing needs of Highland.
- **Program Implementation** identifies the specific actions that will be implemented to ensure that Highland's housing needs are met within the planning period.

Appendices

- **Appendix A - 5th Cycle Review** evaluates the efficacy of the 5th Cycle Housing Element; the progress in Housing Element implementation; and the appropriateness of the goals, policies, and programs.
- **Appendix B - Community Profile** assesses the housing need through detailed information on Highland's demographic characteristics and trends that influence supply and demand of various housing types.
- **Appendix C - Constraints and Zoning Analysis** details governmental and non-governmental constraints to the maintenance, improvement, and development of housing for all income levels.
- **Appendix D - Affirmatively Further Fair Housing Analysis** identifies disproportionate housing needs, including segregated living patterns, concentrated areas of poverty, disparities in access to opportunity, and displacement risk.
- **Appendix E - Sites Analysis and Inventory** describes the methodology by which the City can accommodate its RHNA targets, and provides an inventory of the sites identified to meet the housing need.

- **Appendix F - Community Engagement Summary and Results** provides the detailed results of the outreach conducted for the update to the Housing Element.

Public Engagement

The City conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Stay-at-home orders of 2020 and 2021 provided the City with opportunities to explore new avenues for public engagement and increased access for those who are traditionally not involved in the planning process. Outreach and formal engagement activities were held virtually across a variety of platforms, including an online survey, virtual community workshop, stakeholder interviews, public review period, study sessions, and public hearings.

The outreach conducted for the update to the Housing Element engaged a broad range of community members and stakeholders alike, including, but not limited to, public policy advocates and facilities providing services to people experiencing homelessness. The City cast a wide net to gain participation from all segments of Highland's interested parties. The extensive outreach process conducted for this Housing Element update contributed to a set of meaningful goals, policies, and programs that reflect Highland's housing needs and the priorities and needs of all of those in Highland, including those with special needs and lower-income populations. **Appendix F, Community Engagement Results**, provides a comprehensive summary detailing the outreach conducted as part of the update to the Housing Element, and corresponding materials.

General Plan Consistency

The California Government Code requires that a General Plan prepared by a local government contain an integrated, internally consistent set of goals, policies, and programs. The structure of this Housing Element is built on the same foundation upon which all other elements of the General Plan were formed. In addition, the Housing Element's goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Highland were designed through this coordination.

The City of Highland will maintain consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan. Under State law, the General Plan requires an annual review and report to examine amendments and implementation status. In line with the other General Plan elements, the goals of the Housing Element aim to:

- meet existing housing needs,
- plan for future growth,
- protect and enhance Highland's neighborhoods, and
- provide new housing opportunities.

Goals and Policies

Goal 1: **A preserved and enhanced housing stock within high-qualify neighborhoods.**

Policy 1.1: Facilitate neighborhood improvement and connect residents to housing rehabilitation programs that offer financial and technical assistance to lower-income households.

Policy 1.2: Encourage housing improvement, preservation, rehabilitation, and the replacement of substandard housing as a means to enhance quality of life in Highland.

Policy 1.3: Support housing and neighborhood quality through the enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.

Goal 2: **A diverse range and adequate supply of housing types that align with the needs of all current and future Highland households.**

Policy 2.1: Bolster the City's affordable housing supply through regulatory tools that encourage the development of and funding for quality lower- and moderate-income housing preservation and development.

Policy 2.2: Provide a transparent, timely, and cost-effective regulatory review process that facilitates housing development opportunities at all income levels.

Policy 2.3: Ensure new residential and mixed-use developments are adequately served by park and recreation, libraries, transportation, public safety, and other public services and facilities.

Policy 2.4: Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed-Use districts, special Policy Areas identified in the Land Use Element, and areas with access to resources and amenities.

Policy 2.5: Encourage innovation and creativity in housing development through regulations that increase flexibility in the development approval process and allow the use of construction materials and techniques that reduce the cost of housing and its impact on the environment.

Policy 2.6: Provide adequate outreach to residents to preserve the City's factory-built housing stock and protect residents from displacement.

Goal 3: **A City with adequate sites and resources appropriate for accommodating a variety of housing types.**

Policy 3.1: Establish higher-density nodes with increased housing capacity for a variety of housing types, including housing for lower-income households.

Policy 3.2: Ensure adequate capacity for the development of a range of housing types.

Policy 3.3: Expand the affordable housing stock and provide homeowners with an additional source of income by facilitating the construction of accessory dwelling units.

Goal 4: **An affordable housing supply that equitably meets the needs of extremely low-, very low-, low-, and moderate-income households.**

Policy 4.1: Improve quality of life for lower- and moderate-income Highland residents by increasing opportunities for the creation of lower-cost owner-occupied housing types and by providing housing assistance through the promotion of homeowner and renter assistance opportunities.

Policy 4.2: Provide regulatory and financial incentives to encourage and facilitate the development of affordable single-family, multifamily, and mixed-use housing.

Policy 4.3: Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of housing based on race, religion, or other protected classifications.

Goal 5: **A City with a broad range of housing types to meet the diverse needs of all Highland residents.**

Policy 5.1: Provide the regulatory framework necessary to facilitate special needs housing in Highland.

Policy 5.2: Encourage development of accessible housing for all levels of ability through regulatory relief.

Policy 5.3: Create a continuum of care for those experiencing homelessness in Highland through establishing a housing plan for homelessness, including zoning districts allowing emergency shelters, low-barrier navigation centers, transitional housing, and permanent supportive housing.

Policy 5.4: Support innovative public, private, and nonprofit efforts in the development and financing of affordable, special needs housing.

Program Implementation

Program 1: Homeowner Rehabilitation Program

Homeowner rehabilitation is offered through the Neighborhood Partnership Housing Services through the Renaissance Home Repair Loan. This loan is available to eligible households earning below 80 percent of the Area Median Income in the Inland Valley and provides up to $25,000 per households to be used for financing home improvements, including health and safety repairs and energy efficiency upgrades. The San Bernardino County Community Development and Housing Department refers interested residents in need of assistance to this program.

The City will improve coordination with the County of San Bernardino (County) to identify opportunities for increased funding for homeowner rehabilitation. Further, the City will increase community awareness of available programs and refer interested residents to the County.

Objective(s)	• Engage in regularly scheduled meetings with County staff to discuss homeowner rehabilitation resources. • Partner with County to seek and apply for funding. • Post resources on City website.
Timeframe	• Set up meetings with County staff ~~within 1 year of Housing Element adoption~~by winter 2023 and continue ongoing engagement and coordination. • Apply for funding by fall 2023. • Update website ~~within 1 year of Housing Element adoption~~by spring 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	1.1, 1.2, 1.3

Program 2: Residential Rental Enhancement and Rehabilitation Program

The City's Residential Rental Enhancement Program, in conjunction with the crime-free multiple-family rental housing program, provides technical assistance to rental property owners on how to maintain their rental property and ensure that the property is free from crime. This includes a checklist that rental property owners are required to submit prior to the issuance of a business license certificate to ensure the property is free from health and safety hazards. Further, the police department provides a free training on tenant screening and property safety measures.

The City will continue to provide this program to ensure that rental properties are maintained and that landlords have the resources they need to ensure their properties remain safe for tenants. The City will also add to tenant screening training to provide guidance on fair housing to ensure that tenant screenings do not have a disproportionate negative effect on protected groups. The City will expand access to trainings by posting training materials on the City's website.

Further, the City will explore opportunities to use the in-lieu inclusionary housing fee to fund lower-income rehabilitation for affordable multifamily developments in need of assistance.

Objective(s)	• Continue and expand upon the Residential Rental Enhancement Program to provide fair housing guidance through two trainings per year and by requiring all landlords to complete the trainings. • Post resources on City website. • Where possible, allocate inclusionary funds to affordable multifamily development.
Timeframe	• Residential Rental Enhancement Program is an ongoing program and trainings are bi-annual. • Update website ~~within 1 year of Housing Element adoption~~winter 2023. • Annually evaluate opportunities to allocate funding.
Responsible Agency	• Police Department • Community Development Department
Funding Sources	General Fund
Relevant Policies	1.1, 1.2, 1.3

Program 3: Code Enforcement

The City implements a code enforcement program to assist property owners in addressing Building Code and Zoning Code violations. When the City identifies substandard housing, the City initiates a substandard lien that prohibits the sale of the property until the condition is mitigated. Further the City conducts windshield surveys within neighborhoods identified to receive Community Development Block Grant funding.

The City's 2017 Quality of Life Initiative accelerated proactive code enforcements by hiring two additional full-time code enforcement officers and one police officer.

The City will further the Quality of Life Initiative by providing information to residents about how they can become code compliant without violations by detailing specific code compliance issues and options for how they can be resolved, and will post information and resources regarding code compliance and property maintenance on the City's website.

Objective(s)	• Assist with bringing properties into compliance with the Zoning Code. • Post resources for code compliance on the City's website and connect residents to such resources when the property is at risk of being noncompliant with the Zoning Code.
Timeframe	• Ongoing assistance to properties with code compliance issues. • Update City website ~~within 1 year of Housing Element adoption~~by winter 2023.
Responsible Agency	Code Enforcement Division
Funding Sources	General Fund
Relevant Policies	1.1, 1.2, 1.3

Program 4: Inclusionary Housing

The City's Inclusionary Housing Ordinance requires that all new housing developments provide affordable units on site or off site, or to pay an in-lieu fee that goes into the City's affordable housing preservation and construction fund. The City will continue to implement the Inclusionary Housing Ordinance and will identify affordable housing preservation, rehabilitation, and construction opportunities for the expenditure of acquired funds, especially for funding opportunities of housing for extremely low-income households and households with special needs.

Objective(s)	• Continue to implement the Inclusionary Housing Ordinance. • Allocate funding to the preservation, rehabilitation, and construction of affordable housing, especially for extremely low-income households, when available.
Timeframe	Ongoing implementation of ordinance and allocation of funding, when available.
Responsible Agency	Community Development Department

Funding Sources	Inclusionary Housing Fee
Relevant Policies	2.1, 2.4, 2.6, 4.1, 4.2, 5.1

Program 5: Impact Fees

The City regularly reviews Development Impact Fees to ensure impact costs are appropriate to protect public services. The City will continue ongoing evaluation and updates to impact fees, as necessary. Further, the City will focus future fee assessments to analyze fees as they relate to affordable housing, and will evaluate opportunities to reduce fees for proposed affordable housing developments, especially those that serve extremely low-income households and households with special needs.

Objective(s)	• Review fees after the budget cycle. • Analyze fees for affordable housing, and reduce fees where feasible.
Timeframe	Bi-annually
Responsible Agency	Public Works City Engineering Department
Funding Sources	General Fund
Relevant Policies	2.1, 2.2, 2.5

Program 6: Density Bonus

The City will review and amend the local Density Bonus Program Ordinance to ensure consistency with State requirements, and will amend the ordinance, where needed, including the provision of a bonus for student affordable housing, senior housing, and 100 percent affordable developments to further support extremely low-income households and households with special needs.~~.~~

Objective(s)	Update Density Bonus Ordinance, consistent with State law.
Timeframe	~~Within 1 year of Housing Element adoption.~~ By winter 2023.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department Budget
Relevant Policies	2.1, 2.5, 3.1, 4.3, 5.1

Program 7: Housing Choice Voucher Referrals

The City will continue to support the Housing Authority's Housing Choice Voucher program (Section 8 Vouchers) by providing program information at City Hall and on the City's website. The Housing Choice Voucher program pays rental subsidies directly to rental property owners to benefit lower-income households. The City provides links on its website to the Section 8 Housing Choice Voucher program, and refers all inquiries to the Housing Authority. Further, the City will increase collaboration with the Housing Authority to assist in outreach to potential households and landlords who may participate in available programs.

Objective(s)	• Maintain relevant resources on the City website. • Refer interested residents.
Timeframe	Ongoing through planning period.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.1, 4.1, 5.4

Program 8: By-Right Development on Previously Identified Housing Sites

Those qualifying sites identified in the Sites Inventory that were previously identified in accordance with the specifications of Housing Element law will be permitted the development of housing by right where 20 percent of the total units in the development will be affordable to lower-income households, consistent with Assembly Bill (AB) 1397 (2017). All applicable sites included in previous cycle(s) are identified by Assessor's Parcel Number in Table 11, Sites Inventory Table, of Appendix E, Sites Analysis and Inventory (See Section 3.3, Sites Identified in Previous Housing Elements, of Appendix E, for additional details). The City ~~will review its processes and procedures to~~ ensure that those uses eligible for by-right development will not be subject to any Conditional Use Permit, Planned Unit Development Permit, or other discretionary local government review or approval that would constitute a "project" as defined in Section 21100 of the Public Resources Code.

Objective(s)	~~Amend processes and procedures~~Continue to permit qualifying developments in accordance with State requirements.
Timeframe	Ongoing through planning period.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department Budget
Relevant Policies	2.1, 2.2, 2.4, 3.2

Program 9: Developer Outreach and Transparency

The City will maintain current information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports, consistent with the requirements of AB 1483 (2019).

Further, the City will continue to offer an optional pre-application conference and advertise the benefits through the City's website and the "Come Home to Highland" website. A pre-application conference allows the applicant to receive invaluable comments from City staff prior to submitting a plan, thus reducing the time and cost associated with permit processing.

Objective(s)	Maintain the City's website with the most current information.
Timeframe	Ongoing through planning period
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.1, 2.2, 4.2, 5.1, 5.4

Program 10: Innovative and Efficient Housing

The City implements the most current California Green Building Standards Code. To further increase energy efficiency in housing, the City will coordinate with Southern California Edison and The Gas Company to obtain the latest information on energy-efficient building technology and will post information on the City's website to provide guidance and resources to property owners on energy-efficient strategies and retrofits.

Objective(s)	Update the City's website.
Timeframe	~~Within 1 year of Housing Element update~~By winter 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.5

Program 11: Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas

The City of Highland supports regional efforts for an improved public transportation network and greater linkages between transportation land uses and housing. The City will continue to

work with the Southern California Association of Governments, San Bernardino Associated Governments, Omnitrans, and neighboring communities to develop the Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas. The "Base Line Improvement Project" between Interstate 210 and Cole Street was completed in 2015. The City, in conjunction with the San Bernardino County Transportation Authority, will complete the widening of Base Line at the Interstate 210 interchange, with anticipated completion in 2022. The City will continue coordination to ensure that future transit aligns with the City's vision for growth.

Objective(s)	Coordinate quarterly meetings with appropriate agencies to coordinate land use and transportation planning and to advocate for the prioritization of projects that align with Highland's vision.
Timeframe	Establish quarterly meetings by July 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.3, 2.4, 3.1

Program 12: Accessory Dwelling Units

The City ~~will review and amend the Zoning Code~~has adopted a revised zoning ordinance to permit accessory dwelling units and junior accessory dwelling units in all zones that permit residential uses, consistent with State law, Government Code Section 65852.2. The City will submit the updated ordinance to the State Department of Housing and Community Development (HCD) for their review and will incorporate amendments, as required by HCD. Further, the City will develop and adopt a program that incentivizes and promotes the creation of ADUs that can be offered at an affordable rent for extremely low, very low, low, or moderate-income households or households with special needs (AB 671, 2019).

Objective(s)	~~Review and revise the Zoning Code.~~Submit ordinance to HCD for review and incorporate needed edits. Develop an affordable ADU incentive program.
Timeframe	~~Within 4 years of Housing Element adoption~~ Submit copy of the ordinance to HCD within 60 days of adoption. Develop affordable ADU incentive program by fall 2026.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.1, 2.4, 3.3, 4.2

Program 13: Homeowner Assistance Programs

The City will continue to provide resources to homeowners on the City's website to connect Highland residents with information on County homeowner assistance programs. This includes links on the City's website to resources on housing counseling services and other housing resources available through the County's Community Development and Housing department.

Objective(s)	Maintain resources on website.
Timeframe	Ongoing through planning period.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	4.1

Program 14: Priority Services

The City will coordinate with the East Valley Water District to ensure that proposed developments that include housing affordable to lower-income households are prioritized for the provision of water and sewer services. The City will provide a copy of the updated Housing Element and assist with the identification of sites for prioritization of services through the updates to the Water and Sewer System Master Plans in accordance with Senate Bill 1087 (2004).

Objective(s)	• Maintain a database of existing and proposed affordable housing developments. • Engage in the Water and Sewer System Master Plan updates.
Timeframe	Submit the Housing Element to the East Valley Water District within 1 month of Housing Element adoption.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department Budget
Relevant Policies	2.3, 2.4

Program 15: Fair Housing Mediation

The City partners with the Inland Fair Housing and Mediation Board (IFHMB) to provide fair housing services for its residents. The City will maintain this partnership and will provide information regarding available fair housing services on the City's website. The fair housing services provided by the IFHMB include providing information, investigation, education,

conciliation, and/or referral of housing discrimination complaints free of charge to individuals. It also involves fair housing workshops that are offered year-round to educate housing providers, tenants, homeowners, and financial and lending institutions on the key aspects of fair housing law. Further, IFHMB's mediation department provides information to landlords, tenants, mobile home park owners, and mobile home residents regarding their rights and responsibilities under the California Landlord and Tenant Laws, and facilitates negotiations between parties in housing-related disputes.

Objective(s)	• Continue to maintain information on the City's website. • Continue to partner with IFHMB.
Timeframe	Ongoing through planning period.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.6, 4.3

Program 16: Affordable Housing Preservation Program

No affordable units within Highland are at risk of conversion to market rate during the 2021-2031 planning period. Therefore, the City's housing preservation efforts are focused on assisting homeowners who may be at risk of foreclosure. Subprime lending practices have resulted in numerous foreclosures throughout Highland. The City seeks to reduce foreclosures by providing educational information to its residents. The City will provide educational homeownership brochures and refer concerned homeowners and homebuyers to nonprofits such as Neighborhood Housing Services of the Inland Empire Inc. and the Homeownership Preservation Foundation. Information will be made available at City Hall and on the City's website.

Additionally, the City will continue to monitor existing publicly assisted affordable housing and provide technical assistance for those that might convert to market rents and displace extremely low-, very low-, low-, and moderate-income tenants.

Further, the City will continue to refer residents to the County's website for information on housing advocacy groups, public agencies, and nonprofit organizations.

Objective(s)	• Continue to maintain information on the City's website. • Maintain and monitor a list of affordable housing developments and year of possible expiration of deed-restriction or other assistance.
Timeframe	Ongoing through planning period.

Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	1.1, 1.2, 1.3, 2.1

Program 17: Housing for Persons with Disabilities

The City has adopted Reasonable Accommodation procedures that provide a process by which relief from land use, zoning, or building laws, rules, policies, practices, and/or procedures can be alleviated for those with disabilities, including persons with developmental disabilities. The City will promote this procedure by providing information on its website that is easily accessible.

Also, the City will continue to provide informational materials on Southern California Edison's Customer Assistance Program at City Hall and on the City's website. The program is designed to help persons with disabilities, including developmental disabilities, maintain low energy use. The program also targets low-income households, older adults, and non-English-speaking customers.

Further, the City will continue to refer individuals and families with developmental disabilities to the Inland Regional Center in San Bernardino. The Inland Regional Center is the largest nonprofit, State-funded social service facility in the State that focuses on persons with developmental disabilities. The City will provide a link to the Inland Regional Center's website on the City's website.

Additionally, to further opportunities for persons with disabilities and older adults with varying levels of ability, the City will explore opportunities to connect residents to resources on increasing in-home accessibility by posting materials on its website related to home retrofit guidance and accessibility in accessory dwelling units.

Objective(s)	Update the City's website to provide information.
Timeframe	By fall 2023
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	4.3, 5.1, 5.2, 5.4

Program 18: Residential Care Facilities

The City will update the Zoning Code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. Additionally, the City will create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving six or fewer persons by right in all residential zones in

accordance with the Welfare and Institutions Code Section 5116 and permitting those serving seven or more in at least one zone without discretion.

Objective(s)	The City will update the Zoning Code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. Additionally, the City will create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving six or fewer persons by right in all residential zones and permit those serving seven or more in at least one zone without discretion.
Timeframe	~~Within 1 year of Housing Element~~By winter 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.4, 3.1, 3.2, 5.1

Program 19: Emergency Shelters, Transitional Housing, ~~and~~ Permanent Supportive Housing, and Single Room Occupancy

The City will update relevant sections of the Zoning Code to assist in the development of housing for those with special needs and extremely low-income households and to ensure consistency with State law as it relates to supportive housing, emergency shelters, and transitional housing, as follows:

- Permit supportive housing by-right in residential zones that permit multifamily uses and mixed-uses zones that allow residential uses in accordance with AB 2162 (2018).
- Permit emergency shelters by-right in at least one zone and ensure that parking requirements accommodate the staff working in the shelter and do not require more parking than other residential or commercial uses within the same zone in accordance with AB 139 (2019).
- Permit transitional housing in the same manner as other residential uses in the same zone in accordance with AB 139 (2019).

Additionally, the City will amend the Zoning Code to identify a process by which single-room occupancies (SRO) can be permitted to further increase housing opportunities for extremely-low income households.

Objective(s)	Amend the City's Zoning Code as detailed above and in conformance with State law.

Timeframe	~~Within 1 year of Housing Element~~By winter 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	5.1, 5.3

Program 20: Affordable Housing Partnerships

The City will support creative models of affordable property ownership and affordable housing preservation through methods such as community land trusts. Informational resources will be provided on the City's website to connect lower-income households, including extremely low-income households and those with special housing needs, to housing advocacy groups, public agencies, and nonprofit organizations in the event that opportunities for purchasing lower-income housing developments becomes available. The City will conduct outreach to housing advocacy groups to improve coordination and increase publication of how advocacy groups can assist residents.

Additionally, the City will continue to foster relationships with affordable housing property owners, tenants, and nonprofit organizations to assist in the long-term affordability of affordable developments.

Objective(s)	• Update the City's website. • Conduct outreach to increase collaboration among the City's partners.
Timeframe	• Website update by fall 2023. • Ongoing outreach through planning period.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	1.2, 4.1, 5.4

Program 21: Mobile Home Preservation

Consistent with the provisions of Government Code Section 65863.7, the City shall require the submission of a report detailing the impacts of any proposed conversion of an existing mobile home park. The report shall include a replacement and relocation plan that mitigates the impact upon the ability of the displaced residents of the mobile home park to be converted or closed to find adequate housing in a mobile home park, consistent with the requirements of State law. The report, as well as any adverse impacts on the housing supply, lower-income households, and on displaced persons, shall be considered before the change of use can be

approved. Further, the City shall require the replacement of any lost units to ensure no net loss of the City's existing housing stock that is affordable to lower-income households, including extremely low income households.

Objective(s)	• Require a report for each proposed conversion or closure. • Consider the findings of the report, as well as the impact on the existing housing supply, lower-income households, and displaced persons.
Timeframe	Ongoing through planning period.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	1.2, 2.6

Program 22: Collaborative Partnerships

The City has administered funds for a variety of affordable housing needs, such as construction costs, rent subsidies, and home improvement grants. Working in collaboration with other entities will help the City's resources go further and meet the needs of additional lower-income households, including households with special needs and extremely low-income households. The City will contact local affordable housing service providers to discuss partnering, and will continue to seek financial assistance from other agencies. The City will make relevant information available on its website as it relates to available funds.

Objective(s)	• Continue outreach to local affordable housing service providers. • Update the City's website.
Timeframe	• Ongoing outreach through planning period. • Update website ~~within 1 year of Housing Element adoption~~by winter 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	4.1, 5.4

Program 23: Lot Consolidation Incentive

The City will provide a permit expedite incentive for lot consolidation for multifamily development on sites identified in the Housing Element as having the potential to accommodate lower- or moderate-income units, including those sites with potential for extremely low-income development and development to meet the needs of those with special needs, and will consider expanding this incentive to all lower-income and mixed-income residential and mixed-use developments.

Objective(s)	The City will amend the code to incentivize lot consolidation on specified sites through an expedited development permit review process.
Timeframe	~~Within 1 year of Housing Element~~By winter 2023.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	2.1, 2.4, 4.2

Program 24: Annual Progress Reports

The City will continue to report annually on the City's progress toward its 8-year RHNA housing production targets, the remaining housing capacity, and toward the implementation of the programs identified in the Housing Element to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development in accordance with the requirements of AB 879 (2017).

Objective(s)	• Track housing production, remaining capacity, and program progress. • Submit adopted Annual Progress Reports annually by April 1st.
Timeframe	Ongoing through planning period with annual reports.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	3.2

Program 25: No Net Loss

The City will use its development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet

any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under Senate Bill 166 (2017).

If, at any time during the planning period, a development project results in fewer units by income category than identified in the Sites Inventory (**Appendix E, Sites Analysis and Inventory**) for that parcel and the City cannot find that the remaining sites in the Housing Element are adequate to accommodate the remaining RHNA by income level, the City will, within 180 days, identify and make available additional adequate sites to accommodate the remaining RHNA.

Objective(s)	• Amend staff procedures to ensure all development proposals and rezone proposals are reviewed against the capacity identified for sites in the Sites Inventory (Appendix E). • Develop a methodology for tracking remaining capacity.
Timeframe	Tracking is ongoing and amendments to procedures will be implemented ~~within 1 year of Housing Element adoption~~by winter 2023.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	3.2

Program 26: Fair Housing Analysis

The City will continue to contribute to the regional evaluation of discriminatory housing practices by participating in the County of San Bernardino Analysis of Impediments to Fair Housing. The Analysis of Impediments to Fair Housing identifies regulations or practices that may create an unequal housing environment in San Bernardino County communities. In addition to participating and updating the Analysis of Impediments, the City will evaluate the need to establish an Ad Hoc Fair Housing committee to provide policy recommendations to ~~address governmental related regulations that may contribute to an unequal housing environment in the City~~guide policies and programs in a manner that furthers fair housing.

Further, the City will administer all programs and activities related to housing and community development in a manner to Affirmatively Further Fair Housing by developing a process that prompts the consideration of fair housing in the development decision process. This process could include a requirement to have a statement of fair housing consideration on all staff reports for Planning Commission and City Council.

Objective(s)	• Coordinate annual meetings with County of San Bernardino and fair housing agencies. • Regularly conduct Analysis of Impediments to Fair Housing Choice. • Evaluate the need for an Ad Hoc Fair Housing Committee when updating the Analysis of Impediments. • Implement a procedure that prompts fair housing administration for housing and community development decisions.
Timeframe	~~Within 1 year of Housing Element adoption~~by winter 2023. Update to the City's Analysis of Impediments every 3 to 5 years.
Responsible Agency	Community Development Department/ Housing Authority
Funding Sources	Community Development Department/ Housing Authority
Relevant Policies	4.3, 5.4

Program 27: Replacement Requirements

The City will mandate replacement requirements consistent with the Housing Crisis Act of 2019 for proposed housing developments on sites that currently have residential uses, or within the past 5 years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households. ~~The City will consider revaluation of this program upon sunset of this State requirement.~~

Commented [ED1]: Note to City: legislation was extended past planning period.

Objective(s)	• Amend staff procedures related to the review and issuance of demolition and development permits. • Enforce replacement requirements in accordance with Government Code Section 66300. • ~~Consider a reevaluation of processes if the legislation sunsets.~~
Timeframe	• Amend staff procedures ~~within 1 year of Housing Element adoption~~by winter 2023, continue ongoing

	replacement requirements~~, and reevaluate in 2025~~ through the planning period.
Responsible Agency	Community Development Department/ Housing Authority
Funding Sources	Community Development Department/ Housing Authority
Relevant Policies	1.2, 2.1, 3.2

Program 28: Low-Barrier Navigation Centers

Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The City will amend the Zoning Code to permit the development of Low-Barrier Navigation Centers as a use by-right, without requiring a discretionary action, in mixed-use and non-residential zones that permit residential uses, consistent with AB 101(2019).

Objective(s)	Amend the Zoning Code, consistent with State requirements.
Timeframe	~~Within 1 year of Housing Element adoption~~By winter 2023.
Responsible Agency	Community Development Department/Housing Authority
Funding Sources	Community Development Department/Housing Authority
Relevant Policies	5.1, 5.3

Program 29: Affordable Housing Streamlining

The City will amend its Zoning Code to provide an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals. Further, the City will amend its internal procedures to include Senate Bill 35 (2017) streamlining in staff permitting process procedures.

Objective(s)	Amend the Zoning Code and staff procedures, consistent with State requirements.
Timeframe	Amendment to take place ~~within 1 year of Housing Element adoption~~by winter 2023, and streamlining availability to be ongoing through planning period.
Responsible Agency	Housing Authority
Funding Sources	Housing Authority

Relevant Policies	2.1, 2.2, 4.2

Program 30: Objective Design Standards

The City will increase transparency and certainty in the development process through objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official, and shall be uniformly verifiable by reference to the City's regulations in accordance with the requirements of the Housing Crisis Act of 2019.

Objective(s)	Monitor Zoning Code amendments to ensure any new design standards are objective.
Timeframe	Ongoing through planning period.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	2.2, 2.5, 4.2

Program 31: Surplus Lands

The City will identify and prioritize local surplus lands available for housing development affordable to lower-income households, including extremely low-income households and households with special needs, and report on these lands annually through Housing Element Annual Progress Reports in accordance with the requirements of AB 1486 (2019).

Objective(s)	Identify and track surplus City-owned sites.
Timeframe	Annually, through the planning period.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	2.4, 3.2, 4.2

Program 32: Increased Transparency

The City will maintain information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports in accordance with the requirements of AB 1483 (2019).

Objective(s)	• Ensure all relevant information is provided on the City's website. • Continue to update information as changes are made and as it becomes available.
Timeframe	Ongoing, through the planning period.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	2.4, 3.2, 4.2

Program 33: Reduced Parking Requirements

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations, including extremely low-income households and those with special needs. The City will ensure that appropriate parking reductions apply to any development proposals that would eliminate religious-use parking spaces in exchanged for housing developments, in accordance with the requirements of AB 1851 (2020).

Objective(s)	Amend the Zoning Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.
Timeframe	~~Within 1 year of Housing Element adoption~~By winter 2023.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	2.5, 3.2, 4.2, 5.4

Appendix A: 5th Cycle Review

Contents

1 Evaluation of 5th Cycle Programs 1
2 Review of Programs Addressing Special Housing Needs 21

1 Evaluation of 5th Cycle Programs

For the 5th Cycle General Plan Housing Element (2014–2021), the City of Highland (City) committed to specific programs to address the comprehensive housing needs of the City and to help achieve the goals identified in the 5th Cycle Housing Element. This section evaluates progress made toward the goals and actions of the 5th Cycle Housing Element, and was used as a foundation to inform the programs of the 6th Cycle Housing Element (2021–2029) tailored to meet this cycle's housing needs. California Government Code Section 65588(a) requires each jurisdiction to regularly review its Housing Element and evaluate the following:

- The progress in implementation of the Housing Element
- The effectiveness of the Housing Element programs in progress toward achieving the housing goals and objectives
- The appropriateness of the housing goals, objectives, and policies, and in contributing to the attainment of the State housing goal

This evaluation provides information on the extent to which programs have achieved stated objectives and whether these programs continue to be relevant to addressing current and future housing needs in the City. The success of a program toward achieving the 5th Cycle goals is the basis for the goals, policies, and programs and the establishment of objectives provided in the 6th Cycle. **Table 1** lists each program from the 2014–2021 Housing Element, and identifies the program progress, effectiveness, and appropriateness. The goals, policies, and programs of the 6th Cycle Housing Element are reflective of the program effectiveness as determined by this evaluation.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
Goal 8.1 - Preserve and enhance the quality and character of Highland's housing stock and existing residential neighborhoods.		
Provide neighborhood improvement and unit rehabilitation programs that offer financial and technical assistance to lower income single-family homeowners and owners of rental housing.	1 **Single-Family Rehabilitation** **1A.** Seek funding resources to continue to implement single-family rehabilitation programs that provided lower and moderate income homeowners with rehabilitation grants and loans (formerly funded by the Redevelopment Agency). Repairs include–but are not limited to–room additions, septic systems, paint and stucco, acoustic ceilings, roofing, and pest control. Timing/Objective: Identify funding by 2016 Responsible Agency: Community Development Department Funding Source: Grants, Inclusionary Housing In-Lieu Fees, and other alternatives will be explored	**Progress:** The City provided information to residents on County of San Bernardino (County) programs for which Highland residents were eligible. These included weatherization and senior rehabilitation programs. **Evaluation:** Several programs were previously funded by the Redevelopment Agency. The City's Inclusionary Housing In-Lieu fees have been dedicated to the construction of new affordable housing units. The San Bernardino County Community Development and Housing Department refers interested residents in need of assistance to the Neighborhood Partnership Housing Services program, which offers the Renaissance Home Repair Loan of up to $25,000 for eligible households in the Inland Valley to be used for financing home improvements, including health and safety repairs, code compliance, and energy efficiency upgrades. **Appropriateness:** Revise and continue to increase coordination with the County.
Provide neighborhood improvement and unit rehabilitation programs that offer financial and technical assistance to lower income single-family homeowners and owners of rental housing.	1 **Single-Family Rehabilitation** **1B.** Continue to participate in the "World Changers" Program which rehabilitates homes for low to moderate income residents. Timing/Objective: Approximately 5 homes per year Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The program was terminated due to loss of the Redevelopment Agency and cessation of the Immanuel Baptist Church "World Changers" Program. No new funding sources have been identified. **Evaluation:** Since the City has not identified funding and the Church has ceased participation in this program, it is no longer effective in assisting low- to moderate-income residents. **Appropriateness:** Delete.
Provide neighborhood improvement and unit rehabilitation programs that offer financial and technical assistance	2 **Rental Rehabilitation** **2A.** The City of Highland has a significant number of rental properties in certain areas of the community that are in disrepair and in need of	**Progress:** The City adopted the Residential Rental Enhancement Program (RREP) (Ordinance 412 and Ordinance 440), and Section 5.34.020, Crime Free Multiple-

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
to lower income single-family homeowners and owners of rental housing.	rehabilitation. The City's current rehabilitation programs focus on ownership units but do not extend to rental units. Working in tandem with the rental inspection program, a rental-oriented program could greatly improve the condition of the existing housing stock and quality of life for Highland's renter community. Therefore, the City will develop a program to assist the rehabilitation of single- and multifamily rental housing. Timing/Objective: Adopt program guidelines by March 2014. Seek funding in fiscal year 2014/2015. Responsible Agency: Community Development Department Funding Source: General Fund, Grants, Inclusionary Housing In-Lieu Fees, and other alternatives will be explored	Family Rental-Housing Program (Ordinance 402), of the Highland Municipal Code (HMC) to provide technical assistance to property owners of rental units on how to maintain and keep their property safe. **Evaluation:** The City has been unable to secure funding for a financial assistance program. However, this policy also focuses on providing technical assistance to renters. The RREP and the Crime Free Multiple-Family Rental-Housing Program are designed to assist property owners of rental units to maintain and keep their property safe. The RREP includes a checklist of items that must be evaluated by the owner to ensure the property is safe from a health and safety perspective prior to the City issuing a business license certificate. The crime-free housing program administered by the Highland Police includes free training for rental managers on tenant screening and property safety measures. **Appropriateness:** Modify through reference to County programs. Enhance the RREP through fair housing trainings, trainings will be paired with those administered by the Highland Police Department to further fair housing.
Encourage housing improvement and rehabilitation and the replacement of substandard housing as a means to enhance quality of life in Highland. Ultimately the health of the City's existing neighborhoods has great influence over who selects to reside, build, work, or start a business in Highland.	**2 Rental Rehabilitation** **2B.** Continue rental inspection program to ensure a high level of rental property maintenance. Refer violators to the rental rehabilitation program that will be created as stated above. Timing/Objective: Ongoing 2014–2021. Responsible Agency: Code Enforcement Division Funding Source: General Fund	**Progress:** The program is ongoing and has become a self-certification program by the property owner (RREP). See progress on the RREP in Program 2A. **Evaluation:** The program allows property owners to ensure high level of rental property maintenance. **Appropriateness:** Continue and revise to incorporate fair housing guidance and to educate property owners by providing relevant information on the City's website.
Support housing and neighborhood quality through rigorous enforcement of	**3 Code Enforcement**	**Progress:** In the City's experience with property owners with substandard housing, the properties are transferred to

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.	**3A.** Work with the State Franchise Tax Board in order to enforce the provisions of California Revenue and Taxation Code Section 17299 and 24436.5, which prohibit owners of substandard housing from claiming depreciation, amortization, mortgage interest, and property tax deductions on State income tax. Timing/Objective: Initiate coordination with Tax Board by December 2014 and establish program by June 2015 Responsible Agency: Community Development Department Funding Source: General Fund	new owners prior to City's being able to enforce the California Revenue and Taxation Code. The City has instead initiated a step that includes the recordation of a substandard lien. The City will only release the lien when the substandard condition is mitigated. **Evaluation:** The City has not worked with the State Franchise Tax Board to enforce the California Revenue and Taxation Code. **Appropriateness:** Continue and revise to connect property owners with available resources and remove reference to coordination with State Franchise Tax Board.
Support housing and neighborhood quality through rigorous enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties.	**3 Code Enforcement** **3B.** Perform annual windshield surveys to identify areas with substandard housing. A proactive approach will increase the ability of Code Enforcement staff to protect the City's existing housing stock from deterioration. Timing/Objective: Commence annual windshield surveys and identify services to assist the target areas within six months of adopting the Housing Element. Responsible Agency: Building & Safety Division Funding Source: General Fund	**Progress:** This program is ongoing. A database is available in the Community Development Block Grant division and then assigned to a Code Enforcement officer for the Community Development Block Grant neighborhood. The Code Enforcement officer is assigned full-time in a pro-active and reactive capacity. Additionally, in 2017, the City created the Quality of Life initiative, which included the hiring of two additional full-time code officers and a police officer. The initiative accelerated the proactive code enforcements efforts in neighborhoods. The program includes providing windshield surveys. **Evaluation:** The City has been effective in proactively increasing Code Enforcement staff abilities. **Appropriateness:** Continue and revise to include the Quality of Life initiative effort and to work with residents on becoming compliant with the Code.
Support housing and neighborhood quality through rigorous enforcement of building and property maintenance standards, the education of landlords	**3 Code Enforcement** **3C.** Continue to enforce the City's Property Maintenance Ordinance HMC Section 15.52 (minimum standards for exterior property maintenance). Owners of a property that does not meet the minimum requirements will be notified in writing by the Building Inspector or Code	**Progress:** The City's code enforcement efforts are ongoing. The Neighborhood Pride Grant Program was terminated in 2012 due to loss of the Redevelopment Agency. **Evaluation:** The City has been unable to provide assistance to homeowners or renters to complete any

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
and tenants, and the inspection of properties.	Compliance Officer and given a reasonable period of time to achieve compliance. Code violators will be provided with information on the Neighborhood Pride Grant program to assist them in completing repairs. Timing/Objective: Ongoing 2014–2021. Achieve 85% compliance rate. Responsible Agency: Code Enforcement Division Funding Source: General Fund	necessary home repairs as part of the Neighborhood Pride Grant Program due to loss of funding, but can work to connect residents with informational resources on home maintenance and code compliance. **Appropriateness:** Continue and revise to include with above code enforcement programs to better connect residents and property owners to resources.
Support housing and neighborhood quality through rigorous enforcement of building and property maintenance standards, the education of landlords and tenants, and the inspection of properties	4 Neighborhood Quality 4A. Continue the Code Enforcement, Police, and Fire for Multi-Family Housing program to provide a multi-department, comprehensive approach to resolving problems associated with deteriorating housing developments. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Code Enforcement Division Funding Source: General Fund	**Progress:** The City has substituted a new program called "CPF for Multi-family Housing" (which involves Code, Police, and Fire [CPF]) to improve individual multi-family projects. These are group enforcement efforts by the City's Code Enforcement, Police, and Fire staff. They are coordinated with the property owner. Staff performs a group inspection, any deficiencies are identified, and a correction list provided. Follow-up inspections are performed by the relevant division. **Evaluation:** This program is established and effective in coordination. **Appropriateness:** Continue and revise to combine with code enforcement programs as ongoing effort to identify deteriorating housing and programs to assist property owners and residents in resolving this issue.
GOAL 8.2 - Facilitate the development of housing suitable for the diverse needs of current and future Highland residents.		
Bolster the City's affordable housing supply through regulatory tools that encourage the development of or funding for quality lower and moderate income housing development.	**5 Inclusionary Housing and Fees** **5A.** An Inclusionary Housing Ordinance requiring all new housing construction in the City to provide affordable units on-site, off-site (in special circumstances), or pay an in-lieu fee of $3,750 per unit into the City's housing fund for the preservation and construction of affordable housing was adopted in 2006. Timing/Objective: Ongoing 2014–2021. Responsible Agency: Community Development Department	**Progress:** The program is in place and ongoing. The current balance is approximately $596,000. **Evaluation:** The funds will be used to construct new affordable units at the Housing Authority's property at 7433 Central Avenue. The anticipated proposal will develop approximately ~~80~~ 90 to 110 affordable dwelling units on 3.75 acres. **Appropriateness:** Continue.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	Funding Source: Development community	
Bolster the City's affordable housing supply through regulatory tools that encourage the development of or funding for quality lower and moderate-income housing development.	**5 Inclusionary Housing and Fees** **5B.** Review the in-lieu fee established for the Inclusionary Housing Ordinance to ensure it remains appropriate. Explore opportunities to use the in-lieu fee to fund lower income rehabilitation programs previously funded by the Redevelopment Agency. Timing/Objective: Present review of the fee to City Council by December 2014; and biannually thereafter Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City continues to collect in-lieu fees under the Inclusionary Housing Ordinance. **Evaluation:** The funds will be used to construct new affordable units at the Housing Authority's property at 7433 Central Avenue. **Appropriateness:** Continue and revise to combine with Program 5A.
Ensure new residential projects are adequately served by park and recreation, libraries, transportation, public safety, and other public services and facilities.	5 Inclusionary Housing and Fees 5C. Evaluate Development Impact Fees to ensure that such fees are the minimum necessary to cover actual costs, implement the General Plan, and to ensure protection of public health, safety, and welfare. Also monitor permit processing times to identify areas in which the City can streamline development review. Timing/Objective: Review bi-annually after the budget cycle. Responsible Agency: Public Works/City Engineering Department Funding Source: General Fund	**Progress:** Developer fee schedule was last updated in 2020 per City Council Resolutions 2020-005 and 2020-006. **Evaluation:** Review of fees occurs on a regular basis to ensure impacts costs are appropriate to protect public services. This is a routine function and does not address development impact fees for affordable housing. **Appropriateness:** Continue and revise program to focus on assessing fees as they relate to affordable housing and combine with Program 5A.
Bolster the City's affordable housing supply through regulatory tools that encourage the development of or funding for quality lower and moderate-income housing development.	**5 Inclusionary Housing and Fees** **5D.** Assist in the development of adequate housing to meet the needs of lower and moderate-income households by providing a comprehensive menu of opportunities. The City will specifically target service providers with experience in assisting extremely low-income households. These opportunities include, but are not limited to using housing in-lieu fees to support affordable housing projects, offering density bonuses, making Housing Choice Voucher referrals, redevelopment activities to build new affordable housing and subsidize existing housing, encouraging the development of second units, and facilitating the development of emergency shelters, transitional housing, permanent supportive housing, and single room occupancy units.	**Progress:** The City continues to evaluate in-lieu inclusionary fees. Density bonuses have been codified as part of the HMC and is ongoing. Information regarding housing vouchers is not readily available on the City's website. Accessory dwelling unit (ADU) development has been codified and was last amended in 2019 (HMC Section 16.44.180). The Land Use and Development Code was updated to permit emergency shelters in the Business Park District (Ordinance No. 376 adopted in February 2013). Also, a Draft Ordinance to update the Zoning Code to differentiate between residential care facilities serving six or fewer residents was completed and is pending adoption. Single-room-occupancy units are not included in the HMC.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	Timing: Various timeframes for individual projects throughout 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund, Inclusionary Housing In-Lieu Fees, and other resources if available	**Evaluation:** The program lists several opportunities for providing adequate housing to meet the needs for lower- and moderate-income residents. As of March 2021, 200 units are under construction as part of the San Carlos Apartments, located within the Greenspot Village Marketplace Specific Plan. **Appropriateness:** Remove this program as each measure is included within another program.
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	**6 Regulatory Relief** **6A.** Continue to encourage the development of multifamily housing types by permitting such units by right in multifamily-zoned sites identified in the Housing Element (R-4 and HDS), pursuant to GC Section 65583.2 (h) and (I). Timing/Objective: Maintain the permitted multifamily uses within R-4 and HDS zones as needed to exceed the RHNA for lower income households Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** Ordinance 362 added the "Residential High Density Special Overlay (HDS)" to HMC Section 16.16.020(G) and Zoning map. This HDS Overlay was also included into the Greenspot Village and Marketplace Specific Plan, adopted in June 2013. Multifamily housing is allowed with a Staff Review Permit in the R-4 zone. **Evaluation:** Multifamily residential uses are permitted subject to approval of a staff review permit application in the R-4 zone, and the HDS Overlay has been codified. **Appropriateness:** Continue and revise to permit qualified housing by-right on previously identified sites create a new program tied to lot incentive, and another program related to permit streamlining.
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	**6 Regulatory Relief** **6B**. Continue to update the Land Use and Development Code to address updates to density bonus laws as needed. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: Community Development Department Budget	**Progress:** Section 16.40.090, Development Density, of the HMC was last updated in 2013. It is currently being updated to include the latest density bonus laws. **Evaluation:** The City is in the process of updating its Density Bonus law pursuant to legislation passed by the State since the adoption of the City's density bonus in 2013, including Assembly Bill (AB) 1763 and AB 2345. It is a City Work Program Item and anticipated to be complete within the second quarter of 2021. **Appropriateness:** Continue under a separate program.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	**6 Regulatory Relief** **6C.** Incentivize lot consolidation for high density multifamily projects by expediting the process for sites identified in the Housing Element as having the potential to accommodate densities at or above 20 units per acre (shown in Appendix A). Timing/Objective: Codify expedited processing for lot consolidation applications including multifamily sites identified as having potential to accommodate lower income housing in the Housing Element for the purpose of facilitating larger multifamily projects by December 2014 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City has not codified incentives for lot consolidation in the High Density Multifamily zone (R-4). However, the City incorporated the HDS Overlay into the Greenspot Village and Marketplace Specific Plan, adopted in 2013. The Specific Plan includes incentives for lot consolidation and requirements. **Evaluation:** To date, this incentive has not been used. **Appropriateness:** Modify so that expedited lot consolidation is available to all multifamily development proposals on sites identified in the Sites Inventory to accommodate the lower- and moderate-income Regional Housing Need Allocation (RHNA).
—	**7 Developer Outreach** **7A.** Continue to offer an optional pre-application conference and advertise the benefits through the City's website and the "Come Home to Highland" website. A pre-application conference allows the applicant to receive invaluable comments from City staff prior to submitting a plan, thus reducing the time and cost associated with permit processing. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** Pre-application process in place and ongoing. Standing meetings every Thursday at 10 a.m. Meetings are scheduled 2 weeks from receipt of project description. **Evaluation:** The pre-application meetings have been effective in the development process. **Appropriateness:** Continue and revise to include documentation posting in accordance with the requirements of AB 1483 (2019).
—	**7 Developer Outreach** **7B.** Conduct an annual citywide analysis to assess and document the City's housing activities in an annual report to HCD. Timing/Objective: Ongoing 2014–2014 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** This is an ongoing process and is required by existing regulations. **Evaluation:** Annual reviews are informative and provide no constraints to housing development. This is a routine function. This is required under State law and is not an additional program (Government Code Section 65400). **Appropriateness:** Delete.
Provide a transparent, timely and cost-effective regulatory review process that	**7 Developer Outreach**	**Progress:** Information is available online. **Evaluation:** Availability of procedures provides transparency of the City's development process. This is a

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
facilitates the development housing opportunities for all income levels.	**7C.** Continue to offer the City's brochure on zoning, development requirements, development fees, and permitting procedures in City Hall and online. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	routine function. Fees are required to be available online under State law. **Appropriateness:** Continue and revise to include in one program and include requirements of AB 1483 (2019).
Provide a transparent, timely and cost-effective regulatory review process that facilitates the development housing opportunities for all income levels.	**7 Developer Outreach** **7D.** Continue to utilize a digital database to track development applications and periodically post summaries of this information in development activity reports on the City's website. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** This is ongoing. There is a PDF map available on the City's website that was last updated December 4, 2019. **Evaluation:** The program ensures transparency; however, it is already included in Program 9b. **Appropriateness:** Revise to instead tie to capacity tracking to ensure no-net-loss.
—	**8 Innovative and Efficient Housing** **8A.** Encourage development on sites identified in the land resources section of the Housing Element by providing the inventory of the City's website. Timing/Objective: Provide information on the City's website within three months of Housing Element adoption. Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City provides this information in an appendix to the 2014–2021 Housing Element, which is posted on the City's website. In the summer of 2020, the City created a new webpage to make it easier for users to navigate information. The existing Housing Element (5th Cycle) is located under the "General Plan" heading. **Evaluation:** The City's new webpage has been effective in providing information to the public. **Appropriateness:** Remove and create a separate program related to capacity tracking and ensuring no-net-loss.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	**8 Innovative and Efficient Housing** **8B.** Discuss mixed-use housing development opportunities with property owners in the Planned Development and Mixed-Use districts. Timing: Conduct discussions by December 2015. Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City does not keep a record of continuing conversations. **Evaluation:** The information provided to property owners in the Planned Development and Mixed-Use has incentivized mixed-use housing development along Base Line in the Towncenter Police Area and along Greenspot Road in the Golden Triangle. **Appropriateness:** Combine with Programs 16A, 16B, 20A, and 20B to discuss incentives for affordable housing and

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
		developing relationships with developers to facilitate affordable housing development. Promote mixed-use housing developments within the Greenspot Village and Marketplace Specific Plan.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	**8 Innovative and Efficient Housing** **8C.** Explore opportunities for incentivizing residential green building and renovation efforts. Timing: This City Council goal was established for the 2009/2010 fiscal year. Ongoing 2014–2021. Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City adopted the most recent Green Building Code in 2019. **Evaluation:** The City has adopted the most recent Green Building Code and will defer to incentivizing measures mandated in the California Green Building Code. **Appropriateness:** Delete.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	**8 Innovative and Efficient Housing** **8D.** Continue to allow flexibility in design and development standards through the Planned Development (PD) district, Mixed Use district, and through policies provided in the Community Design Element of the General Plan. The PD zone facilitates more efficient use of the land and design superior to that which could be achieved through the application of conventional development standards. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** This effort is ongoing. The Community Design Element was adopted in 2013 and has not been modified since the adoption of the 2014–2021 Housing Element to continue flexibility in design and development standards. **Evaluation:** The General Plan Policy descriptions in the Land Use Element have been more effective at establishing expectations for facilitating more housing types within the Planned Development (PD) district and Mixed-Use district. **Appropriateness:** Delete.
Encourage the development of a range of housing types in targeted areas of the City, such as inventoried vacant residential sites, Planned Development districts, Mixed Use districts, and special Policy Areas identified in the Land Use Element.	**8 Innovative and Efficient Housing** **8E.** Contact Southern California Edison (SCE) and The Gas Company to obtain latest information on energy efficient building technology. Make this information available at City Hall and on the City's website. Timing/Objective: Provide information by January 2014 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City has not provided information on energy-efficient building technology on its website. **Evaluation:** This program has not been completed. **Appropriateness:** Continue and revise to focus on providing information related to energy-efficient strategies to be implemented during construction and home modifications.
—	**8 Innovative and Efficient Housing** **8F.** Reduce energy waste by reviewing all residential buildings for compliance with Title 24, State of California Energy Standards. Timing/Objective: Ongoing 2014–2021	**Progress:** The City has adopted the most current California Green Building Standards Code. **Evaluation:** The adoption of current Green Code is complete. Implementation of the existing code is ongoing.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	Responsible Agency: Building & Safety Division Funding Source: General Fund	**Appropriateness:** Delete.
GOAL 8.3 - Identify land uses and available land resources appropriate for accommodating a variety of housing types.		
Establish higher density nodes with new housing opportunities intended to serve all income levels.	**9 Residential High Density Special Overlay (HDS)** **9A.** The City will continue the Residential High Density Special Overlay in the Golden Triangle Policy Area, which accommodates up to 650 multifamily units. Timing/Objective: Ongoing Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The Residential HDS Overlay in the Golden Triangle Policy Area was established by City Council Ordinance No. 361 and No. 362. **Evaluation:** City Council Ordinance No. 361 and No. 362 completed this program, and it is no longer necessary to continue through the 6th Cycle Housing Element. **Appropriateness:** Delete.
—	**9 Residential High Density Special** **9B.** The City will continue to implement a formal ongoing monitoring procedure to ensure sufficient residential capacity for units affordable to lower income households is maintained on sites identified to accommodate the RHNA. Where an approval of a development (residential, commercial, or other) on a site identified as having lower-income potential in Appendix A results in a reduction of potential affordable units below the residential capacity needed to accommodate the RHNA, the City will identify and designate additional sites to accommodate the shortfall. The City will report on the status and implementation of the Housing Element including development occurring on identified sites, to determine whether development is occurring at densities consistent with the buildout projections described in Appendix A (in accordance with Government Code Section 65583 (a)(3) and 65583.2(h) and (I). As necessary, the City will identify alternate sites or densities to ensure that higher density multifamily housing remains a realistic and viable development strategy. Timing/Objective: Establish a Housing Element Site Monitoring Program concurrently with amendments to the Land Use and Development Code and Zoning Map as detailed in Program action 9a. Responsible Agency: Community Development Department	**Progress:** The City's website continues to provide a PDF of the housing developments within the City. **Evaluation:** Approval process for development projects will continue to monitor affordable units. **Appropriateness:** Remove and instead include a program to ensure no-net-loss of needed capacity throughout the 6th Cycle.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	Funding Source: General Fund	
—	**10 Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas** **10A.** The City of Highland supports regional efforts for an improved public transportation network and greater linkages between transportation land use, and housing. In August 2012, the City completed a Southern California Association of Governments Compass Blueprint Demonstration Project that explored bringing bus rapid transit to the Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas of Highland. The City will continue to work with SCAG, San Bernardino Associated Governments, Omnitrans, and neighboring communities to encourage transit-oriented development in the Inland Empire. Timing/Objective: Ongoing 2014–2021. Continue to collaborate with SCAG, SANBAG, Omnitrans, and Policy Area property owners Responsible Agency: Community Development Funding Source: General Fund (original project funding was provided through SCAG via grants from the U.S. Department of Transportation)	**Progress:** The City continues to work with the Southern California Association of Governments (SCAG), San Bernardino Associated Governments, Omnitrans, and neighboring communities to develop the Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas. The "Base Line Improvement Project" between Interstate 210 and Cole Street was completed in 2015. **Evaluation:** Review of the current land use map in conjunction with transit stops indicates there is greater potential for mixed-use development along Baseline, west of Palm. **Appropriateness:** Modify to update language.
Provide a variety of home building opportunities for a range of housing types.	**10 Town Center, Base Line Corridor, and Victoria Avenue Corridor Policy Areas** **10B.** The Compass Blueprint Demonstration Project involved creating 3-D models and videos of the Base Line corridor and what it could look like after residential, mixed use, and commercial infill development and multimodal transit improvements. The City will leverage this digital resource to attract new residential and mixed use development to the area and inspire existing property owners to reinvest in their housing structures. Timing/Objective: Post videos online and share them with the Chamber of Commerce and other interested parties by 2014 Responsible Agency: Community Development Funding Source: General Fund (original project funding was provided through SCAG via grants from the U.S. Department of Transportation)	**Progress:** The City is currently working on updates to the website. The "Base Line Improvement Project" between Interstate 210 and Cole Street was completed in 2015. **Evaluation:** This program is an ongoing priority for the City and continued updates are underway. **Appropriateness:** Combine into one program to focus on coordination with relevant agencies.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
Expand the affordable housing stock and provide homeowners with an additional source of income by facilitating the construction of second dwelling units.	**11 Second Units** **11A.** Continue to encourage the development of attached or detached second units in accordance with HMC Section 16.44.180 Second Units Ordinance. Timing/Objective: Maintain advertisement of the Second Unit Ordinance on the City's website and the "Come Home to Highland" website Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** From 2015 to 2020, the City approved eight ADUs. Additionally, the City's ADU ordinance was updated in 2019. **Evaluation:** More recent updates to ADU laws will require additional amendments to the City's ADU ordinance. In 2018, three ADUs were approved, two ADUs were approved in 2019, five were approved in 2020, and four ADUs have been approved to date as of March 2021. Interest in ADU development is increasing as awareness in the community becomes more prevalent. **Appropriateness:** Modify to amend the ADU ordinance consistent with State law, Government Code Section 65852.2.
Goal 8.4 - Assist in the provision of adequate and affordable housing for all Highland residents.		
Improve quality of life for lower and moderate income Highland residents through providing homeownership assistance and promoting County homeowner and renter assistance opportunities.	**12 Homeowner Assistance Programs** **12A.** Provide additional homeownership resources to Highland residents by providing information on County homeowner assistance programs at City Hall and on the City's website. Timing/Objective: Update website in January 2014 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** Ongoing. There is a link on the City's website to the County's Community Development and Housing Homepage, Housing Resources, Housing Counseling Services, and Section 8 Housing Choice Voucher Programs. **Evaluation**: Residents can readily find this information on the City's website and it has been implemented. **Appropriateness**: Continue.
Improve quality of life for lower and moderate income Highland residents through providing homeownership assistance and promoting County homeowner and renter assistance opportunities.	**13 Renter Assistance** **13A.** Support the Housing Authority's Housing Choice Voucher program (Section 8 vouchers) by providing program information at City Hall and on the City's website. The Housing Choice Voucher program pays rental subsidies directly to rental property owners to benefit lower income households. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The Housing Programs section of the City's website directly provides a link to the Housing Authority of the County of San Bernardino's website, which provides information for the Housing Authority's Housing Choice Voucher program (Section 8 Vouchers). **Evaluation:** Residents can readily find this information on the City's website and it has been implemented. **Appropriateness:** Continue and revise to focus on Housing Choice Voucher referrals and continued maintenance of the existing webpage.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
—	**14 Priority Services** **14A.** Provide the Housing Element to the City's water and sewer service providers and assist them in drafting policies to provide priority water and sewer service to affordable housing projects. Timing/Objective: Provide housing element and offer assistance upon adoption Responsible Agency: Community Development Department Funding Source: Community Development Department Budget	**Progress:** The 2014–2021 Housing Element was provided to the Water and Sewer department for preparation of the 2019 Water System Master Plan and 2019 Sewer System Management Plan. **Evaluation:** The program is effective in ensuring utility providers account for changes to land use to provide adequate water and sewer service to affordable housing projects. **Appropriateness:** Continue.
Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of housing based on race, religion, or other arbitrary classification.	**15 Fair Housing Mediation** **15A.** Increase awareness of the City's partnership with the Inland Fair Housing & Mediation Board (IFHMB) by providing a link to their website (www.ifhmb.com) on the City's website and include an article regarding IFHMB services in the City's annual newsletter. The City will make fair housing brochures available at Highland City Hall, Highland Senior Center, Highland Library, Highland Family YMCA, and the Police Station. The City will continue to refer Highland residents, tenants, landlords, and property owners to IFHMB to assist in resolving fair housing issues. Timing/Objective: Update website and provide brochures by January 2014 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City provides a link to the IFHMB website under Housing Programs on the City's website. **Evaluation:** The City has met the objectives of this program in providing information regarding IFHMB services. **Appropriateness:** Continue and revise to focus on continued maintenance of information on the City's website and to continue the City's partnership with IFHMB.
Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of housing based on race, religion, or other arbitrary classification.	**15 Fair Housing Mediation** **15B.** Contribute to the regional evaluation of discriminatory housing practices by participating in the County of San Bernardino Analysis of Impediments to Fair Housing. The Analysis of Impediments to Fair Housing identifies regulations or practices that may create an unequal housing environment in San Bernardino County communities. Timing/Objective: Complete according to the County's schedule Responsible Agency: Community Development Department Funding Sources: General Fund	**Progress:** The County of San Bernardino Analysis of Impediments to Fair Housing Report was completed in 2015 and involved public outreach. **Evaluation:** The City continues to participate in the evaluation of discriminatory housing practices through the Regional Analysis of Impediments to Fair Housing Choice. **Appropriateness:** Continue under a separate program.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	Program	Progress in Implementation
—	**16 Housing Preservation Program** **16A.** Subprime lending practices have resulted in numerous foreclosures throughout Highland. The City seeks to reduce foreclosures by providing educational information to its residents. The City will provide educational homeownership brochures and refer concerned homeowners and homebuyers to nonprofits such as Neighborhood Housing Services of the Inland Empire, Inc. and the Homeownership Preservation Foundation. Information will be made available at City Hall and on the City's website. Timing/Objective: Provide information by January 2014 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** This is ongoing. Updates to the website have not yet been made. **Evaluation:** The City is unable to record the number of foreclosures reduced through the City's provision of educational materials to residents. Nonetheless, the program is effective in disseminating information to homeowners and homebuyers. **Appropriateness:** Continue and revise to continue to refer residents to assistance and other resources and to update the City's webpage to better connect residents to information and resources.
—	**16 Housing Preservation Program** **16B.** The affordability covenant at Raintree Apartments is expected to expire in 2020. The City will establish a program to provide outreach to owners of affordable projects, such as this one, to ensure that they understand ways to ensure affordability, such as partnering with or selling to the City or an affordable housing organization. The program will include providing owners of affordable projects with a list of affordable housing developers and organizations. An informative letter will be issued to relevant affordable housing organizations. Timing/Objective: Establish program and provide information by January 2016 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City negotiated with the ownership of Raintree Apartments but was unable to secure an agreement. **Evaluation:** The City conducted outreach with Raintree Apartments but was unable to secure a partnership. **Appropriateness:** Continue and revise to focus on reducing foreclosures by providing educational information to residents and to monitor affordable housing.
—	**16 Housing Preservation Program** **16C.** In the event that the affordability covenants at Raintree Apartments are planned to expire, the City will notify local affordable housing entities in an effort to attract interest and resources for preserving the units. The California Department of Housing and Community Development maintains a list of qualified entities. These organizations are leaders in obtaining, maintaining, and managing	**Progress:** The City negotiated with the ownership of Raintree Apartments but was unable to secure an agreement. **Evaluation:** New affordable housing entities have not been attracted through this program; however, the City continues to track a list of low- and moderate-income housing with

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	affordable housing developments and are logical partners for the City, the property owner, and other interested nonprofits. Timing/Objective: Reach out to qualified entities, if needed, by 2018. Responsible Agency: Community Development Department Funding Source: General Fund	long-term covenants in the City, which is available on the City's website. **Appropriateness:** Delete. The program is no longer needed specific to Raintree Apartments, as Program 20A will continue to monitor existing publicly assisted affordable housing in the City.
GOAL 8.5 - Facilitate the development of a broad range of housing types to meet the special needs of Highland residents.		
Encourage development of accessible housing for the disabled through regulatory relief.	**17 Housing for Disabled Persons** **17A.** Enact a process for disabled individuals, including persons with developmental disabilities, or those acting on their behalf to make requests for reasonable accommodation in regard to relief from the various land use, zoning, or building laws, rules, policies, practices, and/or procedures of the City. This process will include a review of the zoning code for compliance with fair housing laws and procedures for assisting those making the request, and a procedure for appeals. Timing/Objective: February 2013 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City is in compliance with all new disability laws and policies (HMC 16.40.090, Reasonable Accommodations). **Evaluation:** This program has been codified into a process for providing reasonable accommodations for individuals with disabilities. **Appropriateness:** Modify to continue to connect households with information on how to maintain low energy use to reduce energy costs and explore opportunities to connect residents to resources on in-home accessibility.
—	**17 Housing for Disabled Persons** **17B.** Provide informational materials on Southern California Edison's Customer Assistance Program at City Hall. The program is designed to help persons with disabilities, including developmental disabilities, control their energy use. The program also targets low income, senior citizens, and non-English speaking customers. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Building & Safety Division Funding Source: General Fund	**Progress:** This program is ongoing. **Evaluation:** The City is uncertain if Highland resident enrollment in the program is due to the informational materials at City Hall. However, the program is effective for transparency purposes. **Appropriateness:** Modify to combine with programs to provide informational materials on the City's website.
—	**17 Housing for Disabled Persons** **17C.** Refer individuals and families with developmental disabilities to the Inland Regional Center in San Bernardino. The Inland Regional Center is the largest nonprofit, state-funded social service facility in the	**Progress:** This program is ongoing. **Evaluation:** The City continues to refer individuals and families with disabilities to the Inland Regional Center in San Bernardino.

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	state that focuses on persons with developmental disabilities. Provide a link to the Inland Regional Center's website on the City's website. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	**Appropriateness:** Modify to combine with other programs for housing for persons with disabilities.
Provide the regulatory framework necessary to facilitate special needs housing in Highland.	**18 Residential Care Facilities** **18A.** Update the zoning code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. Create separate definitions and permitting processes for the two types of residential care facilities, and permit those serving 6 or fewer persons by right in all residential zones. Timing/Objective: Amend the Land Use and Development Code by January 2013 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** This item has not been codified. It is on a comprehensive Code update that has been drafted, but not yet approved by management or the City Attorney, to move forward to public hearing. **Evaluation:** As this has not yet been codified, its evaluation is unable to be determined. **Appropriateness:** Modify to update timeframe.
Creation of a continuum of care for the homeless in Highland through establishing a housing plan for the homeless including zoning districts allowing emergency shelter, transitional housing, and permanent supportive housing.	**19 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing** **19A.** Address the urgent shelter needs of the homeless by updating the Land Use and Development Code to permit emergency shelters in the Business Park district, which has the capacity to provide at least one year-round shelter for the City's 112 homeless persons. Address transitional housing needs by permitting transitional housing and permanent supportive housing by right of zone. Timing/Objective: Amend the Land Use and Development Code by January 2013 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** Emergency shelters (of 25 persons or fewer) are allowed in the Business Park district through Department Review. Transitional housing and permanent support-type housing facilities are excluded from the Business Park district. Supportive and transitional housing is allowed in residential areas through Staff Review in the Agricultural Equestrian (A/EQ) district, R-1, Village Residential (VR) district, and East Highland Village (EHV) district. All other residential zones require a Conditional Use Permit, and thus, are not permitted by-right. **Evaluation:** The program has been effective in implementation and has led to the establishment of two transitional housing facilities. **Appropriateness:** Modify to latest updates to legislation.
Creation of a continuum of care for the homeless in Highland through establishing a housing plan for the	**19 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing**	**Progress:** Emergency shelters (of 25 persons or fewer) are allowed in the Business Park district through Department Review. Single-room-occupancy units are not permitted in

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
homeless including zoning districts allowing emergency shelter, transitional housing, and permanent supportive housing.	**19B.** The City has established an emergency shelter, transitional housing, and permanent supportive housing subcommittee to prepare a study evaluating model ordinances, case studies, zoning districts, and development standards to encourage and facilitate these forms of special needs housing (including single room occupancy units) in accordance with Senate Bill 2. The subcommittee is preparing a plan to meet Highland's emergency shelter, transitional housing, and permanent supportive housing needs. The plan will include amending the Land Use and Development Code to permit emergency shelters without discretionary approval in the Business Park district, conditionally permit single room occupancy units in the Business Park district, and permit transitional and permanent supportive housing as residential uses subject to the same approval process and restrictions as similar residential uses in the same zone (based on unit type). Timing: Amend the Land Use and Development Code by January 2013 Responsible Agency: Community Development Department Funding Source: General Fund	the Business Park district. Supportive and transitional housing are allowed in select residential through Staff Review in the A/EQ, R-1, VR, and EHV districts. All other residential zones require a Conditional Use Permit. **Evaluation:** Under State law, transitional and supportive housing must be treated as a residential use in all zones that allow residential uses and be permitted under the same restrictions as residential uses of the same type in the same zone. Under AB 2162 and AB 2988, supportive housing meeting specific standards shall be a use by right in zones where emergency shelters are permitted, and in all zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. **Appropriateness:** Modify to combine with Program 19A and include amendments to the Land Use and Development Code to comply with current State law requirements for transitional, supportive, and emergency shelters.
—	**20 Affordable Housing Preservation** **20A.** Continue to monitor existing publicly assisted affordable housing and provide technical assistance for those that might convert to market rents and displace extremely low, very low-, low-, and moderate-income tenants. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The City keeps track of low- and moderate-income housing with long-term covenants. This program is ongoing. **Evaluation:** The program has proven difficult to monitor for the City. **Appropriateness:** Modify to coordinate with the Housing Authority to facilitate monitoring existing affordable housing and combine with Programs 16B and 16C.
—	**20 Affordable Housing Preservation** **20B.** Update contact list of housing advocacy groups, public agencies, and non-profit organizations to have available in the event of opportunities for purchasing or managing lower income housing projects. Timing/Objective: Update contacts annually, ongoing 2014– 2021.	**Progress:** The City refers residents to the County's website to search for housing advocacy groups, public agencies, and nonprofit organizations. **Evaluation:** It is unclear if the program has been effective. **Appropriateness:** Modify to creating relationships with affordable housing advocacy groups through affordable

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	Program	Progress in Implementation
	Responsible Agency: Community Development Department Funding Source: Community Development Department Budget	housing partnerships. The City will initiate partnerships and continue to work with owners, tenants, and nonprofit organizations to assist in the long-term affordability of affordable developments.
—	**20 Affordable Housing Preservation** **20C.** Continue to update a list of all available lower and moderate-income housing assistance programs and make the list available on the City's website and during developer pre-application conferences. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: Community Development Department Budget	**Progress:** The City provides a link to the County's website and individual assistance programs. **Evaluation:** The links are a good source of information that are kept updated by the County. **Appropriateness:** Modify to continue providing up to date links and information on City's website, and merge with Program 20B.
—	**21 Mobile Home Preservation** **21A.** Based on the provisions of Government Code Section 65863.7, require the submission of a report detailing the impacts of any proposed mobile home park conversion with the filing of any discretionary permit. Timing/Objective: Require a report for each proposed conversion. Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The program is ongoing as needed. **Evaluation:** The program is effective as a regulatory tool to preserve mobile homes and should be continued under State law. **Appropriateness:** Continue.
—	**21 Mobile Home Preservation** **21B.** Require all condominium and mobile home conversion applicants to relocate displaced residents to the extent required by law. Timing/Objective: Implement on a project-by-project basis throughout the planning period. Responsible Agency: Community Development Department Funding Source: General Fund	**Progress:** The program is ongoing as needed. **Evaluation:** This program is required by State law. However, this program is a routine function and not applicable as a Housing Element program. **Appropriateness:** Continue.
—	**21 Mobile Home Preservation** **21C.** Define and distinguish manufactured housing from mobile homes and travel trailers, as set forth in current HUD codes, and define the process for approving or disapproving such uses to comply with state law. Timing/Objective: Adopt definitions and permitting procedures by January 2014.	**Progress:** HMC Section 16.06 has separate definitions for "manufactured house" and "mobile home." Under manufactured home, it states, "For floodplain management purposes, the term 'manufactured home' also includes park trailers, travel trailers and other similar vehicles placed on a site for greater than 180 consecutive days."

Table 1: Review of 2014–2021 Housing Element Past Accomplishments		
Policy (if applicable)	**Program**	**Progress in Implementation**
	Responsible Agency: Community Development Department Funding Source: General Fund	**Evaluation:** The definition of a "dwelling unit" in the City's Code includes mobile homes and therefore does not preclude a mobile home from being developed in zones that permit single-family uses. **Appropriateness:** Delete.
Support innovative public, private, and nonprofit efforts in the development and financing of affordable, special needs housing	**22 Collaborative Partnerships** **22A.** The City has administered funds for a variety of affordable housing needs such as construction costs, rent subsidies, and home improvement grants. Working in collaboration with other entities will help the City's resources go farther and meet the needs of additional lower income households. The City will contact local affordable housing service providers to discuss partnering and continue to seek financial assistance from other agencies. Timing/Objective: Ongoing 2014–2021 Responsible Agency: Community Development Department Funding Source: Community Development Block Grants, HCD Emergency Housing Assistance Program, and Federal Emergency Shelter Grants and others	**Progress:** Most recent partnership with Community Housing and Corporation for Better Housing. Negotiation Agreement approved partial grant funding in place. Unfortunately, the project was financially infeasible. The City is now partnering with an alternative developer, Housing Ventures. In preliminary negotiations. **Evaluation:** The program is effective in collaborative efforts to bring resources for lower-income households to the City. **Appropriateness:** Continue.

2 Review of Programs Addressing Special Housing Needs

A review of policies and programs from the City's 5th Cycle Housing Element is necessary to evaluate the effectiveness in addressing the housing needs for populations with special needs. The term 'special needs' is used to describe the housing needs of farmworkers, large families and female-headed households, those experiencing homelessness, those with disabilities, including developmental disabilities, and older adults or seniors. Provided below are programs of the 5th cycle Housing Element that directly or indirectly address the special housing needs of the population.

Program 17, Housing for Disabled Persons accommodates persons with disabilities, including developmental disabilities, and older adults by providing amenities and relief regarding affordable and safe housing. Program 17A requires the City to be in compliance with disability laws and policies, and also provide relief from various land use, zoning, or building laws, rules, policies, practices, and/or procedures of the City. Program 17B provides informational materials on Southern California Edison's Customer Assistance Program at City Hall. This helps persons with disabilities control their energy use. Program 17C refers individuals and families to the Inland Regional Center in San Bernardino where persons with disabilities, including developmental disabilities, can be accommodated. The City was successful in the implementation of the objectives of this program.

Program 18, Residential Care Facilities addresses special needs housing in the City by providing a regulatory framework. This entails updates to the zoning code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. This creates separate definitions and permits facilities serving six or fewer persons by right in all residential zones. At the time of the 5th Cycle Housing Element, the comprehensive Code update had only been drafted and not formally approved.

Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing directly address individuals with special needs by providing them with emergency shelters and supportive housing. Individuals experiencing homelessness may require urgent needs for shelters. Therefore, an update to the Land Use and Development Code to permit emergency shelters in the Business Park district is necessary. Transitional housing and permanent supportive housing are also permitted by right in select zones. This program is effective in that two transitional housing facilities had been established at the time of the 5th Cycle Housing Element, and modifications should be made to the latest updates of legislation.

Other programs that indirectly addresses populations with special housing needs include:

- **Program 2, Rental Rehabilitation** provides a focus on rental-oriented programs that could improve the condition and housing stock for the renter community. This program was adopted as the Residential Rental Enhancement Program (RREP). Many rental units in the City offer residency for lower income groups, as well as accommodate persons with disabilities. By ensuring a high level of rental property maintenance, populations with special housing needs may be served through this program, ensuring they are not subject to substandard living conditions.

- **Program 5, Inclusionary Housing and Fees** assists in the development of adequate housing to meet the needs of lower and moderate-income households, many of which include those with special housing needs. This program was formed as a response to a 2006 Inclusionary Housing Ordinance requiring new housing construction in the City to provide affordable units on-site, off-site (in special circumstances), or pay an in-lieu fee into the City's housing fund for the preservation and construction of affordable housing. The City has been successful in this program, specifically through the development of affordable housing for lower-income households.
- **Program 12, Homeowner Assistance Programs** provides resources that will help lower-income households including households with special needs. Such resources may include housing counseling services and information regarding the Section 8 Housing Choice Voucher program. The City was successful in promoting available programs and will further promote homeowner assistance in the 6th cycle.
- **Program 13, Renter Assistance** aims to improve the quality of life for lower and moderate-income residents, including those with special housing needs, with renter assistance opportunities. This program supports the Housing Choice Voucher program which helps to pay rental subsidies directly to property owners. As a result, this may help offset some of the expenses that households with special housing needs may have. The City successfully implemented the objectives of this program in the 5th cycle.
- **Program 15, Fair Housing Mediation** helps to protect populations who may be vulnerable to discrimination. The program accomplishes this by prohibiting housing discrimination and other related discriminatory actions in all aspects affecting the sale or rental of housing based on race, religion, or other arbitrary classification. The City continues to participate in the evaluation of discriminatory housing practices through the Regional Analysis of Impediments to Fair Housing Choice and has further expanded upon fair housing programs for the 6th cycle.
- **Program 20, Affordable Housing Preservation** protects access to affordable housing by keeping track of low- and moderate-income housing with long-term covenants, supporting housing advocacy groups, agencies, and non-profit organizations, and providing resources to housing assistance programs. This program was successful in providing information to available resources on the City's website. The City does not have any units at-risk of conversion to market rate, therefore this program focuses on monitoring development through the 6th cycle.

Programs that were identified to be effective from the 5th Cycle Housing Element will be continued and modified as necessary. New programs created for the 6th Cycle Housing Element supplement specific housing needs for residents with special needs.

Appendix B: Community Profile

Table of Contents

1 Introduction 3
1.1 Overview 3
1.2 Data Sources 3
1.3 Public Participation 4
2 Demographic Profile 5
2.1 Population Growth 5
2.2 Age Characteristics 5
2.3 Race and Ethnicity 6
2.4 Employment Characteristics 7
2.4.1 COVID-19 Impact on Employment Trends 8
2.5 Household Type and Size 9
2.6 Household Income Trends 9
3 Housing Profile 10
3.1 Housing Growth 10
3.2 Age of the Housing Stock 11
3.3 Housing Condition 11
3.4 Tenure and Vacancy 12
3.5 Housing Price and Affordability 13
3.5.1 Home Purchase Price 14
3.5.2 Housing Affordability 15
3.5.3 COVID-19 Impact on Home Prices 16
3.5.4 Rental Prices 16
3.6 Overcrowding 18
3.7 Overpayment and Cost Burden 18
3.8 Special Needs Groups 20
3.8.1 Persons with Disabilities 21
3.8.2 Persons with Developmental Disabilities 22
3.8.3 Older Adults 24
3.8.4 Large and Single-Parent Families 25
3.8.5 Female-Headed Households 26
3.8.6 Farmworkers 27
3.8.7 Extremely Low-Income Households 27

3.8.8 Persons Experiencing Homelessness 29
3.9 Affordable Housing 31
3.9.1 Assisted Housing Developments at Risk 31
3.9.2 Costs Analysis 32
3.9.3 Preservation Resources 33

Figures

Figure 1. Average Home Value in Highland 14
Figure 2. Highland Rent 2018 17
Figure 3. Disability by Type 22
Figure 4. Households by Household Size 25

Tables

Table 1. Population Growth 2000–2035 5
Table 2. Age Characteristics 2000–2018 6
Table 3. Ethnicity 2000–2018 7
Table 4. Employment Status for City Residents Over 16 2000–2018 7
Table 5. Employment Profile for the City (2017) 8
Table 6. Household Size in the City (2018) 9
Table 7. Household Income in the City 10
Table 8. Composition of the Housing Stock in the City 11
Table 9. Age of Housing Stock in the City 11
Table 10. Substandard Housing in Highland (2018) 12
Table 11. Occupied Units in the City 13
Table 12. Home Sales Prices October 2020 14
Table 13. Maximum Affordable Price and Rent 15
Table 14. Highland Rent 2018 17
Table 15. Households Income Category by Tenure in Highland (2018) 18
Table 16. Median Household Income by Tenure (2019) 19
Table 17. Housing Cost as a Percentage of Household Income (2019) 19
Table 18. Households by Proportion of Income Spent on Housing Costs (2018) 20
Table 19. Percent Income Spent on Rent in Highland (2019) 20
Table 20. Disability by Employment Status 22
Table 21. Developmental Disabilities by Type of Residence in the City 23
Table 22. Large Households by Tenure (2019) 26
Table 23. Median Family Income by Family Size (2019) 26
Table 24. Extremely Low-Income Housing Needs in the City 28
Table 25. Local Resources for Homeless and At-Risk of Homeless Persons 29
Table 26. Assisted Units At Risk of Conversion 32

1 Introduction

The Community Profile for the Housing Element for the City of Highland's General Plan is a description and analysis of demographic, employment, and housing characteristics that influence housing demand, housing affordability, and housing needs. The Community Profile includes an evaluation of existing and projected housing needs and the potential constraints to meeting them. The findings in this report are the foundation for establishing meaningful goals, policies, and programs in the City of Highland's Housing Element.

1.1 Overview

Incorporated in 1987, the City of Highland (City) has strived to become a high-quality community for families to call home. The City boasts historic neighborhoods, master planned communities, mountain views, and a rich history dating back to the late 1800s.

The City has seen significant changes in its housing market and housing conditions during the last decade. Housing prices have steadily rebounded following the drastic decline of the 2008 market downtum. Housing and apartment rents have also increased over the last few years. Although Highland has only been a city for 35 years, much of the housing stock on the west side predates incorporation, so the revitalization of housing is also a local concern.

The Housing Community Profile provides the foundation for the Housing Element to address planning issues in the City, in accordance with State law. The Housing Community Profile examines the demographic profile of the City, the existing housing stock, special needs groups, and existing affordable housing developments to understand demographic and housing characteristics and effectively evaluate housing and community needs. Through this examination, the Housing Community Profile lays the foundation for goals, policies, and programs to address the following issues in the City:

- Adapting to changing housing market conditions.
- Meeting State-mandated regional housing needs goals.
- Furthering quality housing and neighborhoods.
- Accommodating social and economic diversity.
- Assisting residents with special housing needs.

1.2 Data Sources

Various sources of information have been consulted in preparing this Housing Element. The 2010 Census provides the basis for population and household characteristics. Where applicable, the following sources of information have been used to supplement and update information contained in the 2000 and 2010 Census:

- Southern California Association of Governments (SCAG) Adopted Growth Forecast, 2016
- SCAG's Pre-Certified Local Housing Data for the City of Highland, 2020
- U.S. Bureau of Labor Statistics Longitudinal Employment and Household Dynamics, 2017
- Employment Development Department, State of California, 2020
- SCAG Connect SoCal, 2020
- California Department of Finance 2010 and 2020 Composition of Housing Stock, 2020
- California Department of Housing and Community Development's Income Limits, 2020

- U.S. Census American Community Survey, 2019
- Department of Finance Vacancy Rates, 2020
- Home pricing information from CoreLogic, Zillow, and Redfin, 2020
- Guidestone Mortgage Calculator, 2020
- Bankrate Mortgage Calculator, 2020
- California Department of Social Services Care Facility Search, 2020
- San Bernardino County 2020 Homeless County and Subpopulation Survey, 2020
- SCAG 2018 Household Income Distribution Based on County Annual Median Income, 2018
- RentCafe Average Rents, 2020
- Lands of America, 2021
- U.S. Department of Housing and Urban Development's Fair Market Rents, 2020
- Realtor.com Market Trends, 2020
- Mortgage Bankers Association Mortgage Credit Availability Index, 2020
- Home Mortgage Disclosure Act, 2019
- International Code Council Square Foot Construction Costs, 2019
- East Valley Water District Sewer and Water System Master Plan, 2019
- San Bernardino Valley Regional Urban Water Management Plan, 2015
- Zumper Average Rent in Highland, 2021
- California Housing Partnership Los Angeles County Annual Affordable Housing Outcomes Report, 2020

1.3 Public Participation

California law requires that local governments include public participation as part of their Housing Elements. Specifically, Government Code Section 65583(c)(7) states "that the local government 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 program shall describe this effort." State law does not specify the means or methods for participation; however, it is generally recognized that the participation must be inclusive.

The City encourages and solicits the participation of the community and other local agencies in the process of identifying housing and community needs. To initiate community input, the City provided information regarding the Housing Element update on the City's website under "6th Cycle Housing Element Update" in the Planning Department section. The City's website provides a link to an online survey presented in English and in Spanish. Additionally, the City's website directs viewers to contact the City's Associate Planner for further information.

Two public meetings were held during preparation of the Housing Element update. The public meetings were noticed in local newspapers, on the City's website, and at the required public facilities. These public hearings offer the community additional opportunities to participate in program development and raise their concerns about the future of housing in Highland. Rather than conducting an in-person meeting, the Governor's Executive Order N-25-20 allows local governments to hold meetings via teleconferencing while still meeting State transparency requirements. Therefore, the public meetings were held in a virtual format. A detailed summary of the City's Housing Element outreach, including presentation materials, are available in **Appendix F – Community Outreach Summary**.

2 Demographic Profile

A successful strategy for improving housing conditions must be based on an assessment of existing and future housing needs. An evaluation of the City's demographic characteristics provides insight into the City's population that will influence the development of responsive housing goals, policies, and programs.

2.1 Population Growth

According to the U.S. Census, the City of Highland's population grew 19 percent from 44,625 in 2000 reaching 53,104 in 2010. The City's population reached 55,323 in 2020, an additional 4.2 percent increase. Although a major local employment center, Norton Air Force Base, closed in 1994, the City's population has continued to grow due to the development of former orchards in east Highland.

New population growth in the City and other Inland Empire communities is in part due to the availability of more affordable home prices. Individuals and families will often relocate to the Inland Empire for home ownership opportunities as they are priced out of Los Angeles and Orange Counties. As the City pursues infill development and continues to develop remaining vacant land in the east, population growth will continue to occur, but at a slower rate than in decades past. SCAG estimates that the City's population will grow to 65,700 by 2035, an 18.8 percent increase from 2020. **Table 1, Population Growth 2000–2035**, summarizes these population estimates for Highland from 2000 to 2035.

Table 1. Population Growth 2000–2035

Year	2000	2010	2020	2035
Population	44,625	53,104	55,323	65,700
Percent Growth	—	+19%	+4.2%	+18.8%

Source: SCAG 2020, 2016–2040 RTP/SCS Final Growth Forecast by Jurisdiction

2.2 Age Characteristics

Age distribution is an important factor in determining the size, type, and tenure of housing needed in a community. Census data indicates that although the under 18 population has declined since 2010, this age group continues to be the largest cohort in the City (**Table 2, Age Characteristics 2000–2018**). The decline in children is potentially related to the low increase in the number of individuals in the family-forming age group over the last decade. Unlike most cities without a 4-year university, the City has experienced a steady increase in college-age residents. This may be the result of local students staying at home and commuting to school rather than relocating closer to campuses, such as California State University San Bernardino and University of Redlands, or due to young persons joining the workforce rather than leaving for higher education.

Reflective of the Baby Boom generation, the middle-aged and older adult groups are the fastest growing groups. Middle-aged residents typically increase the demand for single-family, detached homeownership opportunities, but as children leave, they may begin downsizing and changing the housing type demand, such as to condominiums. Although the older adult population makes up less than 10 percent of the City's total population, this age group specifically experienced the largest percent increase between 2010 and 2018.

Table 2. Age Characteristics 2000–2018							
Age Group	2000		2010		2018		Change 2010–2018
	Number	Percent	Number	Percent	Number	Percent	
Children and Youth (under age 18)	15,875	35.6%	18,259	34.9%	16,142	29.4%	-5.5
College Age (Ages 18–24)	4,013	9.0%	5,028	9.6%	5,911	10.8%	1.2
Family-Forming Adults (Ages 25–44)	13,377	30.0%	14,087	26.9%	14,173	25.8%	-1.1
Middle Age Adults (Ages 45–64)	8,453	19.0%	11,383	21.8%	13,173	24.6%	2.8
Older Adults (Ages 65+ and Above)	2,887	6.5%	3,584	6.8%	5,146	9.4%	2.6
Total	**44,605**	**100%**	**52,341**	**100%**	**54,859**	**100%**	—
Median Age	27.9		29.7		32.4		4.5
Source: U.S. Census Bureau							

The City's age profile suggests a need for affordable, single-family home ownership opportunities, such as attached single-family homes and family-sized rentals. The family-forming and middle-aged groups typically create demand for housing in units large enough to accommodate children (two or more bedrooms).

These prime working-age groups tend to have higher incomes and larger household sizes than their younger and older cohorts. Census data indicates that in 2018, the median household income was $54,513 for family-forming adults and $74,201 for middle-age adults, compared to $47,168 for older adults and $30,833 for 15- to 24-year-old youth and college-aged households. With growing populations and lower median household incomes for the older adults and college-aged groups, there may be a growing demand for multifamily rental housing, accessory dwelling units, and senior housing.

2.3 Race and Ethnicity

Like much of Southern California, the City is becoming more racially and ethnically diverse. As of 2018, City residents who identified as White made up the majority of the racial composition of the total population, but the number of Hispanic residents (who may be of any race) increased significantly more than any other race from 2010 to 2018 and made up about 53 percent of the total population in 2018. **Table 3, Ethnicity 2000–2018**, shows the City's racial and ethnic trends from 2000 to 2018.

Table 3. Ethnicity 2000–2018							
	2000		2010		2018		Change 2010–2018
	Number	Percent	Number	Percent	Number	Percent	
White	25,089	56.2%	28,225	53.9%	32,712	59.6%	5.7
Black or African American	5,403	12.1%	4,833	9.2%	4,578	8.3%	-0.9
American Indian and Alaska Native	581	1.3%	257	0.5%	757	1.4%	0.9
Asian	2,740	6.1%	3,527	6.7%	4,523	8.2%	1.5
Native Hawaiian and Other Pacific Islander	152	0.3%	211	0.4%	599	1.1%	0.7
Other Alone	8,307	18.6%	13,063	25.0%	8,937	16.3%	-8.7
Two or more races	2,333	5.2%	2,225	4.3%	2,753	5.0%	0.7
Total	**44,605**	**100%**	**52,341**	**100%**	**54,859**	**100%**	—
Hispanic Origin[1]	16,342	36.6%	25,309	48.4%	29,111	53.1%	4.7

Source: US Census Bureau
[1] Persons of Hispanic origin may be of any race or multiple races.

2.4 Employment Characteristics

Census estimates for 2018 identify 40,518 people aged 16 and older in the labor force, a steady increase from 2010 (see **Table 4, Employment Status for City Residents over 16**). The increase in employed persons may correlate to the City's growing middle-aged population and the development of industrial spaces and offices in the City and throughout the Inland Empire. Overall, the City's general labor force characteristics and unemployment rates were virtually unchanged from 2010 to 2018.

Table 4. Employment Status for City Residents Over 16 2000–2018							
Labor Force	2000		2010		2018		Change 2010–2018
	Number	Percent	Number	Percent	Number	Percent	
In Armed Forces	27	0.1%	14	0.04%	16	0.04%	-0.0%
Civilian–Employed	17,058	56.4%	21,349	58.66%	22,953	56.65%	-2.0%
Civilian–Unemployed	1,978	6.5%	2,570	7.06%	2,562	6.32%	-0.7%
Not in Labor Force	11,204	37.2%	12,461	34.24%	14,987	37%	2.8%
Total	**30,267**	**100%**	**36,394**	**100%**	**40,518**	**100%**	—

Source: US Census Bureau

According to the Bureau of Labor Statistics, in 2017 the majority of the City's residents in the labor force, approximately 96 percent, were employed outside of the City, and only approximately 4 percent were employed inside of the City. As shown in **Table 5, Employment Profile for the City**, the largest percentage of Highland's population was employed in health care and social assistance industries, followed by retail trade and accommodation and food services. The largest percentage of jobs offered in the City are also in the health care and social assistance industries, followed by retail trade and accommodation and food service. Several medical facilities are located in the area, including Patton State Hospital Dignity Health – Community Hospital of San Bernardino, and associated supportive services. The majority of persons employed (62 percent) within the City reside in San Bernardino County, and 21 percent reside in Riverside County.

Table 5. Employment Profile for the City (2017)				
	Jobs held By Residents		Jobs Offered in City	
Industry	Number	Percent	Number	Percent
Health Care/Social Assistance	2,955	18.1%	1,371	29.1%
Retail Trade	2,210	13.6%	688	14.6%
Accommodation & Food Service	1,660	10.2%	865	18.4%
Administration & Support, Waste Management and Remediation	1,536	9.4%	378	8.0%
Transportation and Warehousing	1,500	9.2%	81	1.7%
Manufacturing	1,203	7.4%	231	4.9%
Construction	1,087	6.7%	354	7.5%
Wholesale Trade	979	6.0%	37	0.8%
Professional, Scientific & Technical Services	758	4.7%	166	3.5%
Finance & Insurance	448	2.8%	107	2.3%
Educational Services	325	2.0%	26	0.6%
Real Estate, Rental & Leasing	243	1.5%	36	0.8%
Management of Companies & Enterprises	232	1.4%	0	0.0%
Arts, Entertainment & Recreation	204	1.3%	58	1.2%
Information	190	1.2%	7	0.1%
Agriculture, Forestry, Fishing & Hunting	152	0.9%	0	0.0%
Utilities	56	0.3%	16	0.3%
Mining, Quarrying, Oil & Gas Extraction	17	0.1%	104	2.2%
Public Administration	0	0.0%	0	0.0%
Source: US Bureau of Labor Statistics Longitudinal Employment and Household Dynamics 2017.				

American Community Survey income data from 2018 indicates that the median household income was $59,395; however, more than half of employed City residents have relatively low-paying jobs that could result in challenges to affording adequate housing, depending on the incomes of other household members (if other household members are wage earners). In 2018, approximately 10 percent of households earned a median household income of $14,999 or less, and approximately 32 percent earned between $15,000 and $49,999. Some, generally, low-wage earning occupations such as medical assistant, sales clerk, and cashier are common in the industries primarily employing City residents–health care, retail trade, and accommodation and food service.

2.4.1 COVID-19 Impact on Employment Trends

On March 19, 2020, Governor Gavin Newsom of California issued a Stay at Home Order (Executive Order N-33-20) to protect the health and well-being of all Californians and to establish consistency across the State in order to slow the spread of COVID-19. The sudden emergence of the COVID-19 pandemic resulted in significant increases in unemployment throughout the United States. According to the Employment Development Department's Bureau of Labor Statistics, the City's unemployment average of 1,000 persons (3.8 percent) in 2019 increased to 2,200 persons (9 percent) for the month of January 2021.[1]

[1] Data from the Employment Development Department for cities and Census-designated places is limited to not seasonally adjusted labor force and unemployment rates.

2.5 Household Type and Size

A household consists of all persons residing in a dwelling unit, regardless of relationship. Household type and size affect the type of housing and number of bedrooms per unit demanded in the community. According to SCAG's Pre-Certified Local Housing Data, there were 15,932 total households in the City in 2018.

Families comprise the majority of the households in the City. As shown in **Table 6, Household Size in the City**, the Census estimates report that 72 percent of family households consist of two to four members; however, five or more people households (28 percent) are the most commonly occurring household size. These families range from couples of any age to families with children, and therefore could be served by a variety of housing types. In the City, families typically create demand for single-family rentals and ownership opportunities in single-family detached units or amenity-rich single-family attached projects.

An estimated 28 percent of the City's family households are large families of five or more persons. Large families, particularly those with children, typically seek homeownership opportunities in single-family detached homes for the space and financial investment benefits. However, since more income is needed to support more people, many large families face financial hardship in affording adequately sized housing, a topic discussed later in this report.

Nonfamily households, which often consist of individuals living alone or with unrelated persons, make up 20 percent of the City's total households. The majority of nonfamily households, 83 percent, are one-person households, accounting for 16.7 percent of Highland's total households (a lower share of single-person households than the SCAG region overall [16.7 percent vs. 23.4 percent]). One-person households generally seek small housing units, such as apartments, accessory dwelling units, and condominiums.

Table 6. Household Size in the City (2018)

Household Size	Family		Nonfamily	
1 Person	0	0.0%	2,655	82.7%
2 Persons	3,437	27%	438	13.6%
3 Persons	3,086	24.3%	62	1.9%
4 Persons	2,649	20.8%	44	1.4%
5 or More Persons	3,548	27.9%	13	0.4%
Total	**12,720**	**100%**	**3,212**	**100%**
Average Household Size (persons)	3.4			

Source: US Census Bureau

2.6 Household Income Trends

Household income is a critical factor in determining housing opportunity. As shown in **Table 7, Household Income in the City**, Census estimates show the City's 2018 median income was $59,395, which was slightly lower than San Bernardino County's median income of $60,164. Almost a third of the City's households earned annual incomes of $100,000 or more. These upper-income households have access to the greatest variety of housing types, sizes, and amenities. However, the two largest percentage of the City's households were in the "less than $25,000" category (22 percent), followed closely by those earning between $25,000 and $49,999 (20 percent). These households are likely to face difficulty in affording housing regardless of household size.

Table 7. Household Income in the City		
Household Income	2018	
	Number	Percent
Less than $25,000	3,505	22%
$25,000 – $49,999	3,250	20.4%
$50,000– $74,999	2,724	17.1%
$75,000 – $99,999	1,466	9.2%
$100,000 – $149,999	2,724	17.1%
$150,000 – $199,000	1,209	7.6%
$200,000 or more	1,052	6.6%
Total	**15,932**	100%
Median Income	$59,395[1]	

Source: US Census Bureau
[1] In 2018 Inflation-Adjusted Dollars.

3 Housing Profile

This section describes and evaluates housing characteristics to identify existing trends and potential needs. These characteristics include housing growth, housing age and condition, housing prices and rents, tenure, and vacancy. Understanding housing trends can indicate the City's ability to meet future housing needs.

3.1 Housing Growth

The amount and type of housing available within a community reflect the existing housing stock's ability to serve expected population growth and a range of incomes, lifestyles, and family types and sizes.

The City's housing stock was shaped by the City's history as an agricultural area. In the 1940s, large citrus groves gave way to suburban neighborhoods in west Highland. Housing growth moved east, eventually stopping at City Creek. Housing development east of City Creek primarily occurred decades later, spurred by the development of the East Highlands Ranch community in the 1980s. This pattern of housing growth resulted in essentially two "Highlands": the west side has established neighborhoods and the east side has master-planned communities.

Recent housing growth primarily consists of single-family neighborhoods in planned unit developments. Housing growth to meet the needs of various income levels and household sizes in the City is currently not met by the predominant single-family housing type stock. Infill development opportunities are located in west Highland. Larger development opportunities are generally on the east side. A Specific Plan and several planned developments in progress on the eastside will offer a range of housing types, from single-family detached homes to multifamily units.

As shown in **Table 8, Composition of the Housing Stock in the City**, according to SCAG estimates, the City had an estimated total of 16,578 units in 2010. In 2018, the total of estimated units grew to 16,845, representing a 1.6 percent increase. All of the City's housing growth occurred in single-family detached and attached units, with a total of 267 units. The largest portion of the City's overall housing stock consists

of single-family detached units, comprising 78.6 percent of the City's housing stock, which is higher than the 61.7 percent share in the SCAG region.

Table 8. Composition of the Housing Stock in the City

	2010		2020		Percent Change
	Number	Percent	Number	Percent	
Single-Family	12,969	78.2%	13,236	78.6%	2.1%
Detached	12,670	76.4%	12,866	76.4%	1.5%
Attached	299	1.8%	370	2.2%	23.7%
Multifamily	2,654	16.0%	2,654	15.8%	0.0%
2–4 Units	678	4.2%	678	4.0%	0.0%
5+ Units	1,976	11.9%	1,976	11.7%	0.0%
Mobile Homes	955	5.8%	955	5.7%	0.0%
Total	**16,578**	**100%**	**16,845**	**100%**	—

Source: SCAG Local Housing Data

3.2 Age of the Housing Stock

Providing safe and attractive housing improves quality of life for residents. One measure of housing condition is age. As shown in **Table 9, Age of Housing Stock in the City**, the City experienced a boom in housing construction from the 1980s through the 1990s.

Units constructed 30 years ago often require minor rehabilitation to comply with new safety standards and repair signs of inadequate maintenance. Housing units over 50 years of age are more likely to be in need of substantial rehabilitation. According to Census estimates, 12 percent of the City's housing stock was built within the last 20 years, almost 40 percent was built between 20 to 40 years ago, and almost half was built over 40 years ago. Based on the City's west-to-east development pattern, it can be assumed that these older units are primarily in west Highland.

Table 9. Age of Housing Stock in the City

Year Built	Number	Percent
2014 or later	71	0.4%
2010 to 2013	88	0.5%
2000 to 2009	1,799	10.7%
1990 to 1999	3,373	20.0%
1980 to 1989	3,226	19.1%
1970 to 1979	1,917	11.3%
1960 to 1969	2,414	14.3%
1950 to 1959	2,209	13.1%
1940 to 1949	972	5.8%
1939 or Earlier	822	4.9%
Total	16,891	100%

Source: US Census Bureau, 2018.

3.3 Housing Condition

The structural age of a building may be an indicator of housing condition because older buildings are more likely needed to be repaired or replaced. Major rehabilitation projects that come with older building may include roof replacements, foundation repair, and plumbing updates. Highland is a relatively newer City.

Therefore, only 38 percent of housing in the City is older than 1970 as shown in **Table 9**. Structural age, however, cannot be the only indicator that units may need rehabilitation or replacement.

Substandard housing is an indicator that a building should be rehabilitated or replaced because it poses a risk to the health and physical well-being of its occupants, neighbors, and visitors or it lacks essential amenities that diminishes the quality of life. **Table 10, Substandard Housing in Highland** shows the number of units in the City that have a contributing factor to poor housing conditions. This may include a lack of telephone service, lack of plumbing facilities, and lack of complete kitchen facilities. In some cases, these facilities may be illegally built. Other factors that are not included are a lack of heating and health risks such as mold.

Local data shows that the City averages approximately 100 rehabilitation permits per year, which has been increasing as more investors take advantage of the increase in rental rates and demand for rental units in the Inland Empire. Based on consultation with the City's Code Enforcement Officers and Building Official, it is estimated that approximately 3,500 housing units (or approximately 20% of the housing stock) are in need of some level of rehabilitation. However, approximately 20 units are estimated to be in need of replacement. Rehabilitation is necessary to improve the condition of substandard housing that is often more affordable to lower-income homeowners, older adults, and disabled persons. Substandard housing is addressed in **Program 2, Residential Rental Enchantment and Rehabilitation Program** in which property owners are required to submit a checklist prior to the issuance of a business license certificate to ensure the property is free from health and safety hazards. The program will also ensure that rental properties are maintained and that landlords have access to resources they need to ensure the property remains safe for tenants. Additionally, through **Program 3, Code Enforcement**, the City will bring properties into compliance by conducting a windshield survey within neighborhoods identified to receive Community Development Block Grant funding and identify substandard housing that may violate the zoning or building codes.

Table 10. Substandard Housing in Highland (2018)

Factor	Number of Units	Percent of Total Units
No Telephone Service Available	194	1.22%
Lacking Plumbing Facilities	31	0.19%
Lacking Complete Kitchen Facilities	160	1.00%

Source: SCAG 2020, ACS 5-Year Estimate 2014-2018

3.4 Tenure and Vacancy

Ownership rates reflect the ability of the housing stock to meet the needs of households looking for investment or those not ready for the responsibilities, cost, or permanence of home ownership.

As shown in **Table 11, Occupied Units in the City**, homeownership rates decreased, and the share of renters increased by 3 percent between 2010 and 2018. During the 1990s, owner-occupancy rates in the City increased as more single-family homes were built. This development trend resulted in a relatively high percentage of owner-occupied units. Although the type of housing primarily developed in Highland favors homeownership, in recent years the single-family detached housing stock has begun to provide renter opportunities in the form of homes available for lease. Investors purchasing homes with the intention to lease them results in single-family housing renter opportunities. However, an increase in

investor-owned homes reduces the likelihood for housing turnover and may further burden renters who are unable to secure housing at a more appropriate size and cost. Overall, the number of renter-occupied units in the City increased by almost 900 between 2010 and 2018; however, the share of renters in the City is lower than in the SCAG region overall, with 47.5 percent renters.

Table 11. Occupied Units in the City

Tenure	2010		2018	
	Number	Percent	Number	Percent
Owner-Occupied	10,014	68.2%	10,382	65.2%
Renter-Occupied	4,675	31.8%	5,550	34.8%
Total	**14,689**	**100%**	**15,932**	**100%**

Source: US Census Bureau

The vacancy rate is a strong indicator of the housing market and the ability for the housing stock to accommodate changing housing needs. A high vacancy rate can contribute to more affordable housing, while a low vacancy rate indicates that housing demand exceeds supply, leading to a tighter market with fewer opportunities. In general, an optimal vacancy rate is 2 percent for owner-occupied housing and 7 to 8 percent for rental units in a mature community, which indicates a stable housing market. A vacancy rate above 12 percent is considered to be high. Healthy levels of vacancy are considered when ensuring sufficient residential mobility and housing choice while providing adequate financial incentive for landlords or owners to maintain and repair their homes.

According to 2018 American Community Survey estimates, 5.7 percent of all units were vacant in the City. The overall homeowner vacancy rate was 0.4 percent, and the overall rental vacancy was 5 percent, making up nearly a third of the City's total vacant units. This vacancy rate signifies a low vacancy rate and is much lower than the 2010 rental vacancy rate of 10.3 percent following the 2008 Great Recession.

According to the Department of Finance, the 2020 overall vacancy rate in the City remained at 5.7 percent. In comparison, San Bernardino County had a much higher vacancy rate (11.6 percent).

3.5 Housing Price and Affordability

The City's housing costs for ownership and rental units fluctuated greatly over the last two decades. Housing costs for ownership and rental units at the end of the 2000s underwent unprecedented changes that improved the affordability of housing for low-, moderate-, and above moderate-income residents. Between 2000 and 2021, typical home value in the City fluctuated greatly, as shown in the **Figure 1, Average Home Value In Highland.** Overall, typical home value increased from $140,530 in 2000 to $396,000 in 2021. The following describes the affordability of the City's housing.

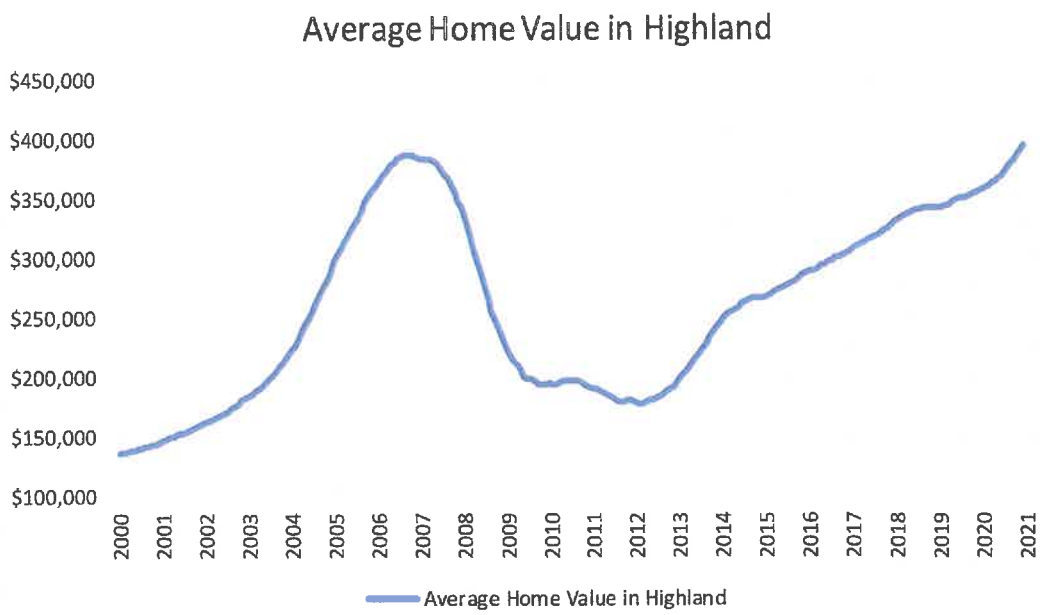


Figure 1. Average Home Value in Highland

Source: Zillow Home Value Index, 2020

3.5.1 Home Purchase Price

Historically, the City has attracted residents for its quality and affordable housing prices and rents. In the City, much like other cities in the Inland Empire, there was a period in the early 2000s when housing prices soared. Much of the appreciation was due to rising housing demand throughout the region, the availability of lower interest loans, and the desirability of new housing products on the market. However, with the downturn in the California economy and collapse of the housing market, home sales prices bottomed out in 2012 to reflect the oversupply of single-family detached homes and shortage of qualified buyers.

According to Zillow's Home Value Index, median home sales price for existing homes was as low as $178,088 in 2012. As the economy recovered, low interest rates and a growing economy enabled more people to buy a home, yet home building was slow to recover following the 2008 recession, leading to a limited increase in supply. Overall, demand outpaced supply and median home sales price steadily rose 93 percent to $343,000 by 2018. According to Zillow estimates, the median home value in Highland was $357,000 in January 2020.

According to CoreLogic, the median sales price of single-family residences and condos, as well as new homes, in October 2020 was $397,500, similar to the median home price of $400,000 for San Bernardino County. These median home sales prices and how they compare to a year prior are shown in **Table 12, Home Sales Prices October 2020.**

Table 12. Home Sales Prices October 2020

County/City	Median Price[1]	Change Since 2019
City of Highland	$397,500	13.6%
County of San Bernardino	$400,000	14%

Source: CoreLogic, October 2020.

[1] Single-Family Detached and Condos

3.5.2 Housing Affordability

The affordability of housing is determined by market prices and current residents' ability to pay. To facilitate the analysis of income distribution among households in communities, the California Department of Housing and Community Development (HCD) groups households into categories by income. Income categories are determined as a percentage of the area median income (AMI) and then adjusted for household size in the following manner:

- Extremely Low Income – less than 30% of the AMI
- Very Low Income – 31% to 50% of the AMI
- Low Income – 51% to 80% of the AMI
- Moderate Income – 81% to 120% of the AMI
- Above Moderate Income – greater than 120% of the AMI

Collectively, extremely low-, very low-, and low-income households are referred to as lower-income households (up to 80 percent AMI). According to SCAG's data for Household Income Distribution Based on County Annual Median Income, 42 percent of the City's households are lower-income households, 15.5 percent are moderate-income households, and 42.5 percent are above moderate-income households.

Table 13, Maximum Affordable Price and Rent, shows maximum affordable rent and purchase price. Maximum affordable purchase prices by income category for two- and four-person households were calculated based on 2020 State income limits. The figures shown in Table 13 are meant as a guideline to compare to the current market. Based on the 2020 median sales price of single-family residences and condos, a household would have to have an annual income of roughly $72,000 to afford to purchase a home in the City. Meaning that only two-person, above moderate-income families and four-person, moderate- and above moderate-income families could afford a home in the City based off the estimated maximum affordable purchase price in Table 13.

Table 13. Maximum Affordable Price and Rent

Household Income Category	Annual Income	Maximum Affordable Rent	Maximum Affordable Purchase Price
2-Person			
Extremely Low	$18,100	**$453**	$66,739
Very Low	$30,150	**$754**	$145,806
Low	$48,200	$1,205	$264,242
Median	**$60,250**	$1,506	$343,307
Above Moderate	**$72,300**	$1,808	$418,374
4-Person			
Extremely Low	$26,200	$655	$98,704
Very Low	$37,650	$941	$139,057
Low	$60,250	$1,506	$329,716
Median	$75,300	$1,883	$432,058
Above Moderate	$90,350	$2,259	$520,809

Source: 2020 HCD State Income Limits, Guidestone.org Mortgage Calculator
Note: Annual income limits based on California State income limits for 2020; acceptable expenditure for rental housing calculated as 30 percent of income divided by 12 months assumes set-asides for utilities; acceptable expenditure for ownership housing was calculated as 30 percent of income and includes 10 percent down payment provided by the owner and assumes set-asides for utilities, real estate taxes, and homeowners insurance. Various local, State, and Federal housing programs may require different calculations of maximum affordable rent or purchase prices.

3.5.3 COVID-19 Impact on Home Prices

Due to the seriousness of the public health crisis resulting from COVID-19, there is a lot of economic uncertainty. Southern Californians, challenged by a pandemic, bought the fewest homes in any June on record, while record-low mortgage rates helped push the median selling price to an all-time high.

Based on the CoreLogic Home Price Insights report, annual home price growth accelerated to its fastest rate in nearly 2 years in July 2020 in response to strong purchase demand and sudden wave of relocations made possible by remote work and historically low mortgage rates falling below 3 percent.

However, the number of sellers remained low in the summer of 2020, while the pool of prospective buyers expanded. Without homes for sale, the uneven buyer-seller dynamic led to an extremely competitive and challenging market for homebuyers.

The research team at Realtor.com listed Riverside–San Bernardino County as one of the five counties with the greatest recovery based on the Housing Market Recovery Index. The index uses the January 2020 pre-COVID-19 pace as a baseline. The Inland Empire (Riverside and San Bernardino Counties) housing market could see a rise in demand and home sales going into 2021, as buyers relocate from the more crowded and pricier coastal markets. However, whether the volume of new listings continues to improve remains to be seen, as sellers face political, economic, and health-related uncertainties heading into 2021.

On a nationwide level, the national Housing Price Index Forecast shows annual home price growth slowing through the middle of 2021, reflecting the anticipated elevated unemployment rates. This could lead to an increase of distressed-sale inventory as continued financial pressures leave some homeowners unable to make mortgage payments, especially as forbearance periods come to a close.

3.5.4 Rental Prices

According to Census data estimates, the nation's renter population has surpassed 100 million, and is the largest it's been since 1960. On a national level, renting has become exceedingly popular in the last decade. Since 2010, the number of renters increased two times faster (+9.1 percent) than the number of homeowners (+4.3 percent), signaling that many Americans, from young families to older adults, have been forced to shift away from homeownership, potentially minimizing housing stability and the ability to build equity.

Rental housing serves many needs, such as young adults not ready for the cost or responsibilities of homeownership, older adults seeking less costly and lower maintenance dwellings, families who benefit from the lower cost of rental housing and on-site amenities, and very low-income families who are often on fixed incomes. Overall, the rental market provides affordable housing opportunities to a great range of household sizes and incomes.

According to RentCafe rental marketplace, the average rent for an apartment in the City was $1,317 as of February 2020, a 9 percent increase compared to the previous year, when the average rent was $1,208. **Table 14, Highland Rent**, and **Figure 2, Highland Rent 2018**, show Census estimates for median gross rent by bedroom.

According to the data presented in Table 14, only housing units consisting of only one room and no bedroom, such as a one-room efficiency apartment, would be affordable to extremely low-income, two- or four-person households. One-bedroom housing units would be affordable to very low-income two-person households that are able to expend slightly more than 30 percent of th eir income on housing.

To avoid overcrowding, a four-person household would need a unit with at least two bedrooms. Based off Census estimates in Table 14, units with more than one bedroom would be unaffordable to extremely low- and very low-income, four-person households. These estimates show that the rental housing stock in the City is generally only affordable to moderate- and above moderate-income households, and some low-income households.

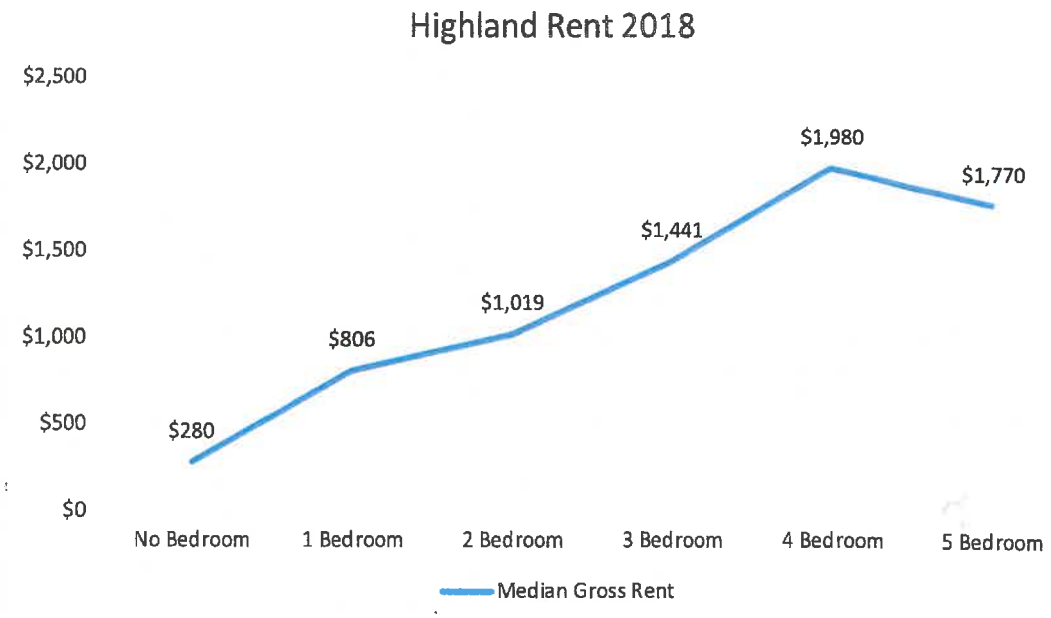


Figure 2. Highland Rent 2018

Table 14. Highland Rent 2018	
Unit Size	**Median Gross Rent[1]**
No Bedroom	$280
1 Bedroom	$806
2 Bedroom	$1,019
3 Bedroom	$1,441
4 Bedroom	$1,980
5 Bedroom	$1,770
Average	$1,093

Source: Census B25031
[1] 2018 rents are expressed in 2020 Inflation-Adjusted Dollars.

3.6 Overcrowding

A household is considered overcrowded if there is more than one person per one room in the housing unit and serves as a useful tool for identifying a lack of supply in affordable housing in an area. In this definition, "rooms" include living rooms, dining rooms, and bedrooms. While some families with low incomes may opt for overcrowding to reduce spending, many lower-income residents often have no choice but to live in overcrowded housing. These overcrowded housing units place a strain on physical facilities and does not provide a satisfying living environment.

According to the American Community Survey, there are approximately 1,455 overcrowded units in the City, representing 9.1 percent of all households, with 2.7 percent of all households having more than 1.5 occupants per room, which meets the American Community Survey definition for severe overcrowding. In the City, overcrowding is more prevalent in renter households; 17.9 percent of renter households compared to 4.4 percent of owner households meet the definition of overcrowded. The existing rental housing stock may not meet the unit size and affordability needs of a portion of the City's lower-income households. See **Section 3.8.4, Large and Single-Parent Families**, for additional discussion.

3.7 Overpayment and Cost Burden

It is essential that Housing Elements analyze the number of cost burdened lower-income households that are overpaying for housing. More specifically, cost burden is defined as paying more than 30 percent of household income for housing. Per HCD requirements, local governments must identify households that are considered to be extremely low-income, as further analyzed in **Section 3.8.7, Extremely Low-Income Households**. Extremely low-income households are those households whose incomes do not exceed 30 percent of the county median family income according to HUD's income limits. The households that are included in this category typically represent the lowest wage earners in a community. **Table 15, Households Income Category by Tenure in Highland**, breaks down household income by tenure in Highland. It is revealed that as median family income increases, the number of owner-occupied units increase. About 41 percent of households in Highland are considered to be of lower income, with the bulk of this category being those with median family incomes that are in the 30 percent to 50 percent income category. Extremely low-income households make up 23 percent of renter-occupied units, and just under 7 percent make up owner-occupied units. Extremely low-income households are the most vulnerable to rent changes and overall housing costs. With most lower income households making up the majority of the rental market, it is necessary to advocate for rental assistance programs.

Table 15. Households Income Category by Tenure in Highland (2018)

Income Category	Owner-Occupied		Renter-Occupied		Total Households	
	Owner	Percent	Renter	Percent	Number	Percent
Extremely Low (30% MFI or less)	705	6.8%	1,285	23.1%	1,990	12.5%
Very low (>30% to 50% MFI)	735	7.0%	1,605	28.9%	2,340	14.7%
Low (>50% to 80% MFI)	1,200	11.6%	950	17.1%	2,150	13.5%
Moderate or Above (over 80% MFI)	7,740	74.6%	1,715	30.9%	9,455	59.3%
Total	**10,380**	**100%**	**5,550**	**100%**	**15,930**	**100%**

Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

MFI = median family income

Table 16, Median Household Income by Tenure, provides the median household income for the City and County, as well as by tenure in the City. It is shown that renter-occupied households make about $30,000

less than the City median household income, followed by the County which is almost $35,000 less, and significantly less than owner-occupied households which is nearly $60,000 less than renter-occupied households.

Table 16. Median Household Income by Tenure (2019)	
Jurisdiction	**2019 Median Income**
City of Highland	$64,868
Owner-Occupied Households	$91,758
Renter-Occupied Households	$31,613
San Bernardino County	$67,903
Source: 2019 ACS 5-Year Estimates S2503	

Table 17, Housing Cost as a Percentage of Household Income, provides the number of households in each income range and the cost of housing as the percentage of their income, filtered by tenure. It is shown that lower income homeowners and renters alike are spending more than 30 percent of their income on housing.

Table 17. Housing Cost as a Percentage of Household Income (2019)					
Owner-Occupied Units					
Income Range	**Total Households**	**% of Total Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30-34+% of Household Income**
$0-19,999	763	4.7%	112	0	651
$20,000-34,999	771	4.8%	173	121	477
$35,000-49,999	837	5.2%	286	169	382
$50,000 +	8,246	51.1%	4,199	2,335	1,712
Subtotal	10,797	66.9%	4,770	2,625	3,222
Renter-Occupied Units					
Income Range	**Total Households**	**% of Total Households**	**0-20% of Household Income**	**20-29% of Household Income**	**30-34+% of Household Income**
$0-19,999	1,263	7.8%	9	28	1,226
$20,000-34,999	1,403	8.7%	19	81	1,303
$35,000-49,999	576	3.6%	44	175	357
$50,000 +	1,879	11.6%	754	831	294
Subtotal	5,341	33.1%	826	1,115	3,180
Total	**16,138**	**100%**	**5,596**	**3,740**	**6,402**
Source: U.S. Census American Community Survey B25106.					
Note: Some households are not accounted for; therefore, figures may differ slightly for other U.S. Census estimates for total households.					

An important factor in determining existing housing need is the affordability of housing. One measure of housing affordability is the percentage of a household's gross income needed to meet monthly mortgage payments. According to HCD and the United States Department of Housing and Urban Development (HUD), housing costs should not exceed 30 percent of a household's gross income.

Households spending more than 30 percent of gross income for housing are considered housing cost burdened, thus limiting their ability to afford other important expenses. This may cause a series of related financial problems, which may result in a deterioration of housing stock because costs associated with maintenance must be sacrificed for more immediate expenses such as food, clothing, health care, and

utilities. It may also result in the selection of inappropriately sized units that do not suit the space or amenity needs of the household.

Lower income households become cost burdened when affordable housing options are limited and difficult to find. As a result, problems may arise in regard to repayment, deferred maintenance, or overcrowding. While overpayment is defined as spending more than 30 percent of household income on housing costs, severe overpayment is more than 50 percent of household income spent on housing costs. **Table 18, Households by Proportion of Income Spent on Housing Costs**, shows the proportions of income spent on housing costs by AMI in 2018. It is shown that the vast majority of extremely low-income households (earning 30 percent or less of AMI) are severely overpaying for housing as opposed to other income groups.

According to the Census Bureau data used by HUD in the Comprehensive Housing Affordability Strategy (CHAS) data, 57.8 percent of renter households and 29 percent of owner households spend 30 percent or more of gross income on housing. Of these households that are cost burdened, 58.6 percent of renters (34 percent of all renter households) and 37 percent of homeowners experience "severe cost burden," spending 50 percent or more of their income on housing. Ownership households generally have higher incomes and equity for loans that enable them to expend less of their annual income on housing.

Table 18. Households by Proportion of Income Spent on Housing Costs (2018)

Household Income	<30% of Income Spent on Housing	30%–50% of Income Spent on Housing (Overpayment)	>50% of Income Spent on Housing (Severe Overpayment)
<30% AMI	395	130	1,465
30%–50% AMI	375	920	1,045
50%–80% AMI	940	850	360
80%–100% AMI	1,050	335	100
>100% AMI	7,165	730	75
Total	**9,925**	**2,965**	**3,045**

Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

AMI = area median income

Table 19, Percent Income Spent on Rent in Highland, shows the 2019 distribution of renter households by the percent of income they spend on rent. The largest percentage of renters at 34 percent (1,820) spend more than 50 percent of gross income on housing costs. This is followed by 20 percent (1,115) of renters who spend 20 percent to 30 percent of their gross income on housing costs.

Table 19. Percent Income Spent on Rent in Highland (2019)

Percent of Income Spent	Number of Households	Percent of Total Renter Households
<20%	826	15.5%
20%–30%	1,115	20.9%
30%–40%	622	11.6%
40%–50%	738	13.8%
>50%	1,820	34.1%
Not Computed	220	4.1%

Source: 2019 ACS 5-Year Estimates B25070

Based on the average rent of an apartment in the City in 2020 and median household income of renter-occupied households, the typical renter will spend closely to 50 percent of their income on housing. At this price point, the average renter will not be able to easily afford a unit with more than two bedrooms.

This also means that very low-income households will be unable to afford apartments with one or more bedrooms without overpaying. This may lead to increased likeliness of overcrowding in units. Rental prices are further discussed in **Section 3.5.4, Rental Prices**.

3.8 Special Needs Groups

Individuals and families in certain subpopulations face significant challenges to finding decent, affordable housing. Finding units of adequate size, location, and design can be especially difficult for subpopulations with any special housing needs, such as older adults; 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. Therefore, in accordance with State law, California Government Code Section 65583(a)(7), this section provides an analysis of the special housing needs of these groups.

3.8.1 Persons with Disabilities

Persons with disabilities often have special housing needs with regard to accessibility, location, and transportation. Persons with disabilities often face employment hardships, and many may rely on fixed incomes, therefore reducing their ability to afford adequate housing. The breadth and variety of disabilities presents a range of challenges for meeting the needs of persons with disabilities, including persons with developmental disabilities. Mountain Breeze Villas in the City provides a number of units as a project-based apartment for adults and older adults who are experiencing homelessness or at risk of experiencing homelessness and receive clinical services from the Department of Behavioral Health.

According to the 2018 Census, approximately 9.7 percent of City residents had a disability. The Census estimates report on six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty, as described below:

- Hearing difficulty: deaf or having serious difficulty hearing.
- Vision difficulty: blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive difficulty: because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory difficulty: having serious difficulty walking or climbing stairs.
- Self-care difficulty: having difficulty bathing or dressing.
- Independent living difficulty: because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.

The 2018 Census identified 5,299 individuals in the City with one or more disabilities. Persons with ambulatory and/or cognitive difficulties represent the largest share of people with disabilities in the City, as shown in **Figure 3, Disability Type**.

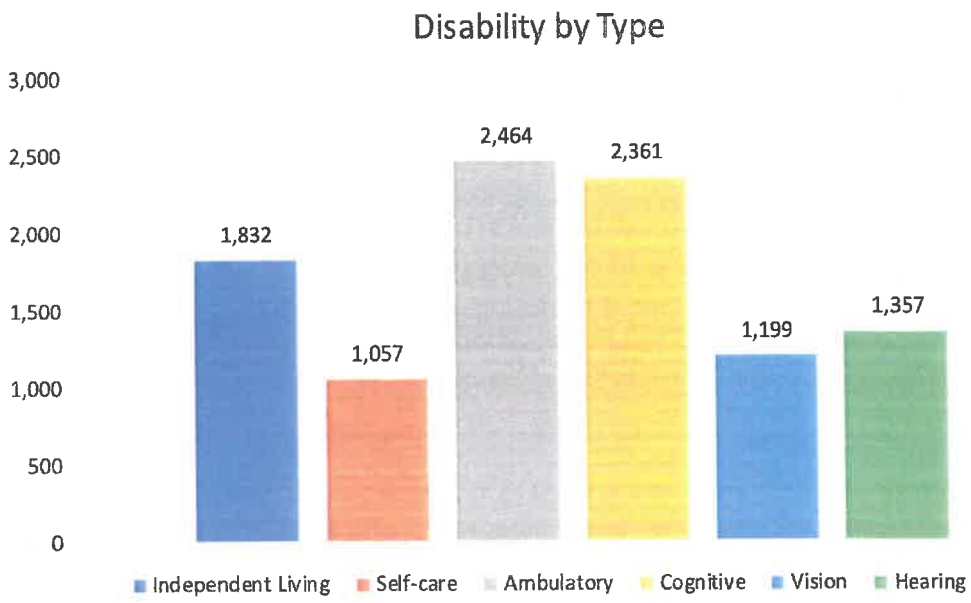


Figure 3. Disability by Type

Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs, as show in **Table 20, Disability by Employment Status**. In the City, 36.2 percent of the population with a disability is employed, compared to 68.9 percent of the non-disabled population.

Table 20. Disability by Employment Status

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	1,063	36%	21,073	69%
Unemployed	139	5%	2,369	8%
Not in Labor Force	1,736	59%	7,121	23%
Total	**2,938**		**30,563**	

Source: SCAG Local Housing Data; American Community Survey 2014-2018 5-Year Estimates.

3.8.2 Persons with Developmental Disabilities

There are also disabilities that are not tracked by the Census. For example, the Census does not record persons or households affected by developmental disabilities, including autism spectrum disorder. Senate Bill 812 requires counties to include the needs of individuals with a developmental disability within the community in the special housing needs analysis. According to Welfare and Institutions Code Section 4512, a "developmental disability" means a disability that originates before an individual attains age 18 years; continues, or can be expected to continue, indefinitely; and constitutes a substantial disability for that individual. According to SCAG's 2020 Local Housing Data, 628 of the City's residents 0 to 17 years and 296 residents 18 years and older have a developmental disability.

The Centers for Disease Control and Prevention's Autism and Developmental Disabilities Monitoring Network estimates that about 1 in 54 children have been identified with an autism spectrum disorder. The City's population under 18 years of age estimate for 2018 is 16,142, indicating that there could be approximately 300 children with an autism spectrum disorder in the City.

Some residents with developmental disabilities may live comfortably without special accommodations, but others require a supervised living situation, such as group housing or an assisted living facility. City residents with developmental disabilities can seek assistance from the Autism Society Inland Empire in Corona or at the Inland Regional Center in San Bernardino, the largest regional developmental disability support center in the State of California. Some people with disabilities may require modifications that allow freedom of movement to/from and within a housing unit. **Table 21, Development Disability by Type of Residence in the City,** provides information about the place of residence for persons with a developmentally disability in the City.

Table 21. Developmental Disabilities by Type of Residence in the City

Residence	Number or Persons With Disability
Home of Parent/Family/Guardian	501
Independent/Supported Living	26
Community Care Facility	37
Intermediate Care Facility	49
Foster/Family Home	10
Other	5

Source: SCAG Local Housing Data; CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019.

The Federal Fair Housing Act of 1998 and the Americans with Disabilities Act (ADA) are Federal laws that are intended to assist in the provision of safe and accessible housing. These regulations were codified in Title 24, Part 2, known as the California Building Code, and apply to newly constructed multifamily dwelling units in buildings with three or more units, or in condominium projects with four or more units. California Code of Regulations Title 24 sets forth accessibility and adaptability requirements for public buildings. However, as these standards are not mandatory for single-family homes, in-home accessibility can be an issue for people with disabilities.

It is the policy of the City, pursuant to the Federal Fair Housing Amendments Act of 1988, to provide people with disabilities reasonable accommodation in rules, policies, practices, and procedures that may be necessary to ensure equal access to housing. The City has adopted specific procedures in the Zoning Code for processing reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act in the application of zoning laws and other land use regulations, policies, and procedures. In order to make specific housing available to persons with disabilities, a request for reasonable accommodation may be made by any person with a disability, their representative, or any entity when the application of a zoning law or other land use regulation, policy, or practice acts as a barrier to fair housing opportunities. A request for reasonable accommodation may include a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice.

3.8.3 Older Adults

Older adults often seek housing based on affordability, proximity to services, proximity to public transportation, and accessibility. Older adult households may reside on fixed incomes, resulting in limited housing opportunities and sensitivity to market increases in housing costs. According to Census estimates, of the City's renter households, 568 are 65 years and over (10.2 percent of all renters). An estimated 2,239 older adult households owned their homes (21.6 percent of all owners).

Disabilities also create special housing needs for older adults. On average, social security disability benefits are lower than social security benefits, which means a lower fixed monthly income. Limited mobility or sensory abilities make accessible, barrier-free housing and proximity to public transportation a priority for some older adult households. According to the 2018 Census, 35.3 percent of all City residents aged 65 years and over suffer from one or more disability. Ambulatory difficulties (21.5 percent of City older adults) and independent living difficulties (16 percent of City older adults) are particularly prevalent in the City, making senior care housing an important need. Moreover, older adult residents seeking to remain independent benefit from programs that help them rehabilitate and improve their home. The reasonable accommodation ordinance in the City's Zoning Code provides older adults with disabilities a clear process for removing impediments to fully accessible housing.

Jeffrey Court provides 60 very low-income and 124 low-income apartments to older adults. For older adults requiring assisted care, the City has five residential care facilities for older adults serving 139 residents and 10 adult residential care facilities with the capacity to serve 52 residents. The Highland Senior Center and Highland District Council on Aging Inc. provide older adults with social events, planned trips, enrichment classes, transportation assistance, and a visitors and phone pal program for homebound older adults.

In addition to the existing resources, two new developments are expected to be completed during the planning period that will serve the needs of the City's older adults. One development is a 60-unit senior assisted living development, which was entitled by the City in 2018 (Resolution 2018-008). The site is located on Base Line Street east of Sterling Avenue next to the Mountain Breeze Villas, a 168-unit affordable housing apartment complex. The second anticipated project is an approximately 90-unit affordable senior apartment development on two parcels owned by the Housing Authority located on Central Avenue. See **Section 4.2, Planned, Approved, and Prospective Projects**, in **Appendix E, Sites Analysis and Inventory**, for additional details.

The City will continue to aid older adults with affordable housing and care services. This can be accomplished through various program, such as **Program 5, Impact Fees** which may reduce fees for proposed affordable housing developments; **Program 6, Density Bonus**, which will include a provision of a bonus for senior housing and affordable developments; **Program 12, Accessory Dwelling Units** which will develop an incentive for the production of ADUs that may be offered as affordable; and **Program 17, Housing for Persons with Disabilities** which may provide relief to older adults with disabilities by alleviating land use, zoning, or building laws, rules, policies, practices, and/or procedures. This program also provides resources and increased in-home accessibility for older adults who have limited mobility. **Program 18, Residential Care Facilities** further addresses older adults who may require residential care by establishing and permitting facilities that serve six or fewer persons by right in all residential zones.

3.8.4 Large and Single-Parent Families

Increasing living costs have placed an additional hardship on lower- and moderate-income large families, defined as five or more members. Large families are considered a special needs group due to the limited supply of housing adequately sized to accommodate a large family without overcrowding. Single-parent households also face additional challenges. Typically, single-parent households have lower incomes than two-parent households since the household may only rely on one income and must also be able to afford housing and childcare. Based on income statistics, female-headed households and female single parents are considered to have a special housing need due to relatively low incomes.

According to Census estimates, there were 12,720 families in the City with an average family size of 3.9 in 2010. Of those families, 3,548, or 27.9 percent, had five or more people. In 2018, there were 15,932 households with a slightly smaller average size of 3.4. As shown in **Figure 4, Households by Household Size**, of those households, 3,561 had five or more people, representing 22.4 percent of all households. According to the 2019 ACS Census data, about 41 percent of large families (5 or more persons) are below the poverty level.

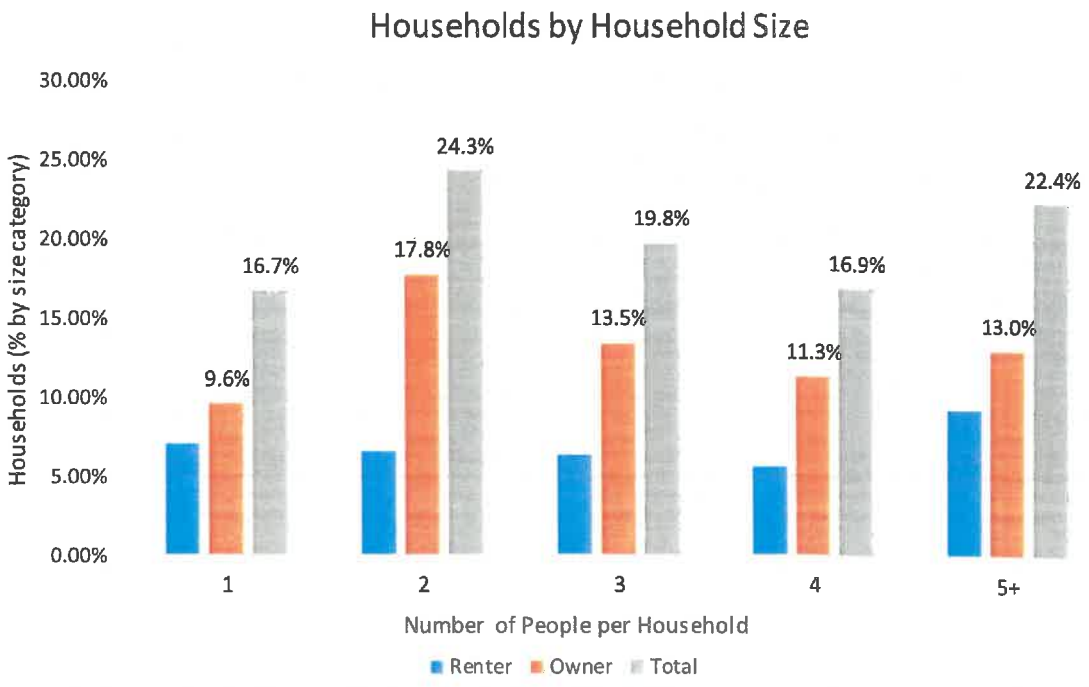


Figure 4. Households by Household Size

Due to the limited supply of adequately sized units to accommodate large-family households, large families face an above-average level of difficulty in locating adequately sized affordable housing. Even when large units are available, the cost is generally higher than that of smaller units. The lack of supply, compounded with the lower income of larger families, results in many large families living in overcrowded conditions. According to the Census ACS estimates, the total number of overcrowded households has decreased in the last decade. As presented in **Table 22, Large Households by Tenure**, there were 3,554

households in the City in 2019 with at least five persons, representing 22 percent of the households in the City. In 2011, there were 3,815 households in the City with at least five persons, representing 25 percent of the total households in the City at that time.

Table 22. Large Households by Tenure (2019)			
Number of Persons in Unit	Owner Occupied	Renter Occupied	Total
Five	1,350	764	2,114
Six	390	318	708
Seven or More	378	354	732
Total	**2,118**	**1,436**	**3,554**
Source: U.S. Census, 2014–2019 ACS B25009			

According to Census ACS estimates, approximately 16 percent (2,706 units) of the City's total housing units had four rooms and approximately 73 percent (12,426 units) had five or more rooms in 2019. Of the City's renter-occupied housing units, approximately 24 percent (1,297 units) had four or more rooms, including 416 units with six or more rooms. Based on the number of housing units available with five or more rooms, there is an adequate supply of large units. Meanwhile, there is less renter-occupied units with four or more rooms. However, based on the median monthly rent estimates discussed in **Section 3.5.4, Rental Prices**, the median monthly rent for a unit with five or more bedrooms would be $1,770 and the median monthly rent for a unit with four bedrooms would be $1,980. **Table 23, Median Family Income by Family Size** lists the median income by the size of the family. Based on rental prices, a 5-person family should be able to afford a unit with 5 bedrooms. However, this is dependent on the number of household earners and number of available units of that size.

Table 23. Median Family Income by Family Size (2019)		
Family Size	Number	Median Income
2-Person Families	4,027	$72,228
3-Person Families	3,062	$67,982
4-Person Families	2,663	$70,881
5-Person Families	1,757	$73,580
6-Person Families	648	$56,786
7-or-More Person Families	665	$75,625
Source: 2019 ACS 5-Year Estimates S1903		

The City will continue to provide accommodations for larger households by implementing various programs that seek to reduce overcrowding units and increase the number of affordable units. This includes **Program 7, Housing Choice Voucher Referrals** will connect residents to available resources that can assist in the cost of housing. **Program 13, Homeowner Assistance Programs**, may provide large households with opportunities for housing or relief so that they can gain access to better sizeable homes. **Program 16, Affordable Housing Preservation Program**, protects large households from risks associated with expiration of affordability agreements. **Program 22, Collaborative Partnerships** may provide financial assistance for large families who seek resources and rental assistance.

3.8.5 Female-Headed Households

Statute requires analysis of specialized housing needs, including female-headed households, in an effort to ensure adequate childcare or job training services. Based on 2018 Census estimates, there were 2,690

female-headed households in the City, 16.9 percent of the City's total households. Of the total-female headed households, 46.6 percent of the female-headed households were owners and 53.4 percent were renters.

Of the City's 15,932 total households, 10.1 percent are female-headed households with children under the age of 18, and 1.3 percent are female-headed with children under 6. In 2018, the number of both male- and female-headed single-parent households with children under the age of 18 was 2,246, representing 14.1 percent of the City's households. Single-parent household incomes tend to be lower than their two-parent counterparts, potentially because the parent may have to take part time employment due to childcare needs.

Single-family detached rentals and multifamily housing with child-oriented amenities, such as playgrounds and on-site childcare, would help meet the housing needs of the City's large-family and single-parent households. Affordable attached housing, such as condominiums, can also help meet the needs of female-headed and single-parent households in the City.

3.8.6 Farmworkers

The economy in Highland was once driven by the citrus industry. As orchards turned into neighborhoods, the number of farmworkers employed in the City decreased. According to the Bureau of Labor Statistics, in 2017, approximately 152 City residents reported employment in agricultural, forestry, fishing, or hunting industries in other cities, and none reported having agricultural or related employment located in the City.

According to SGAG local housing data, there were 82 farmworkers by occupation (41 full-time, year-round jobs) and 117 residents (76 full-time, year-round jobs) who were employed in the agricultural industry in City in 2018. Farmworkers have special housing needs because they generally move based on seasons, earn lower incomes, and are known to live in overcrowded households in order to afford housing. In agriculture-dependent areas, affordable seasonal or permanent housing is an important component of the special needs housing stock. With less than 1 percent of the farmworker job market held by residents, the need for designated farmworker housing is minimal in the City; however, farmworkers are essential to the region's economy and food supply.

3.8.7 Extremely Low-Income Households

Extremely low-income households earn annual incomes that are 30 percent or less of the area median income. Based on State income limits for 2020, a four-person, extremely low-income household earns no more than $26,200 and can afford $655 per month for rent (expending 30 percent of annual income on housing). These households are generally living paycheck-to-paycheck and could be at risk of homelessness in the event of unemployment or a large expense such as medical treatment.

Households with extremely low incomes often experience severe overpayment and overcrowding. Although median gross rent is relatively more affordable in the City ($1,059) compared to median gross rent in San Bernardino County ($1,275) according to the 2018 Census estimates, extremely low-income households typically spend more than 30 percent of their income on housing.

Using American Community Survey 2016 data, HUD's Comprehensive Housing Affordability Strategy estimates that there were 2,189 extremely low-income households in the City (14.2 percent of all

households). Of those households, 71 percent were renters. Housing the extremely low-income population can be especially challenging. Small, extremely low-income households can often be accommodated through second units and single-room-occupancy units; however, large, extremely low-income households may face greater difficulty in finding affordable housing. Subsidized housing appropriate for extremely low-income families can be provided in many forms, including affordable rental multifamily units, townhomes, or condominiums. Higher-density multifamily projects may serve as a future resource for the City's extremely low-income population.

Table 24, Extremely Low-Income Housing Needs in the City, provides a breakdown of extremely low-income households by race and ethnicity. The race/ethnicity with the highest share of extremely low-income households in the City is the Black, non-Hispanic population (20.7 percent compared to 14.2 percent of total population), followed closely by the Hispanic race/ethnicity population, with the second highest share.

Table 24. Extremely Low-Income Housing Needs in the City

Race/Ethnicity	Total Households	Households Below 30% HAMFI[1]	Share Below 30% HAMFI[1]
White, non-Hispanic	6,155	475	7.7%
Black, non-Hispanic	1,421	294	20.7%
Asian and other, non-Hispanic	1,627	210	12.9%
Hispanic	6,265	1,210	19.3%
Total	**15,468**	**2,189**	**14.2%**
Renter-Occupied	5,575	1,560	28.0%
Owner-Occupied	9,910	635	6.4%
Total	**15,485**	**2,195**	**14.2%**

Source: SCAG Local Housing Data, 2020; HUD Comprehensive Housing Affordability Strategy, 2012–2016.
[1] HAMFI refers to Housing Urban Development Area Median Family Income.

Per HCD's requirements, local governments may calculate the projected need for extremely low-income households by presuming that 50 percent of very low-income households qualify as extremely low-income households. Therefore, based on the City's very low-income RHNA of 619 units, there is a projected need of 309 extremely low-income units.

The City will continue to provide services that will aid lower income households and seek developmental opportunities for affordable housing units. The City will do so through the implementation of several programs which include **Program 4, Inclusionary Housing**, which requires that all new housing development provide affordable units on site or off site, or to pay an in-lieu fee that goes into the City's affordable housing preservation and construction fund. This provides lower income households with increased housing security. **Program 6, Density Bonus**, provides an incentive to developers to exceed the maximum allowable development on a property that may help to achieve goals of affordable units for extremely low-income households. **Program 7, Housing Choice Voucher Referrals** directly help low-income households by offsetting monthly housings costs by paying rental subsidies directly to property owners. **Program 15, Fair Housing Mediation** aims to provide fair housing across all households, including extremely low-income households. **Program 16, Affordable Housing Preservation Program** focuses on assisting homeowners who may be at risk of foreclosure and ensures that low-income households maintain ownership of their properties. **Program 20, Affordable Housing Partnerships** and **Program 22, Collaborative Partnerships** both provide a creative framework to partner with advocacy groups and housing service providers which seek to benefit lower income households.

3.8.8 Persons Experiencing Homelessness

People experiencing homelessness are the community's most vulnerable residents. People experiencing homelessness often face chemical dependency, mental health problems, domestic violence, and other life-threatening conditions. Individuals and families experience homelessness for a variety of reasons, and therefore a population experiencing homelessness may have a variety of needs. A person experiencing homelessness may need medical care, childcare assistance, credit counseling, substance abuse treatment, job training, and/or English language education, among other services.

The San Bernardino County 2020 Homeless Count and Subpopulation Survey includes a point-in-time count of people experiencing homelessness and an evaluation of the homeless population and their needs through peer interviews. Based off the results, there were a total of 78 unsheltered adults in the City. This represents approximately 2.5 percent of San Bernardino County's homeless population. Of the 78 persons counted, volunteers were able to administer 50 surveys. The point-in-time survey reported that 35 of the surveyed adults were male and 15 were female. The majority of the unsheltered adults were between the ages of 25 of 39 (40 percent), followed by those ages 55 to 61 (20 percent) and 40 to 49 (15 percent).

Due to a limited rental market with few affordable vacancies and income restrictions, extremely low-income families and individuals are potentially at risk of homelessness. There are a variety of emergency and transitional housing service providers in the City area to address a range of needs (see **Table 25, Local Resources for Homeless and At-Risk of Homeless Persons).** Facilities in the City provide air-conditioned rest areas in dangerously hot weather, emergency food provisions, employment assistance, marriage counseling, psychiatric evaluation and counseling, and transitional housing. City records identified two transitional housing facilities in the City. One of the facilities, located on Elmwood Road, is a six-bed facility for ages 18 to 26. The other facility, located on Newcomb Street, is a six-bed transitional home for people experiencing homelessness. Other nearby communities offer additional resources for people experiencing homelessness and transitional housing facilities.

Table 25. Local Resources for Homeless and At-Risk of Homeless Persons

Name	Location	Services	Target Population
Patton State Hospital Senior Center	Highland	Air-conditioned facilities during dangerously hot weather	All
Saint Adelaide Catholic Church	Highland	Emergency food, employment, and marriage counseling	All
Vista Guidance Centers of Highland	Highland	Psychiatric evaluation and counseling and referral services	All
Family Services Association	Redlands	Motel vouchers, emergency food, clothing, counseling, rental assistance, housing advocacy, basic life skills training, and case management	All
Church on the Hill	Redlands	Emergency food	All
Knotts Family Agency	Redlands	Transitional housing	Youth
Salvation Army	Redlands	Emergency food, counseling, and utility assistance	All
Catholic Charities	San Bernardino	Casework, counseling, motel vouchers, emergency food, and utility assistance	All
Central City Lutheran Mission	San Bernardino	Casework, transitional and emergency housing, home repairs,	Varies per program

Table 25. Local Resources for Homeless and At-Risk of Homeless Persons			
Name	**Location**	**Services**	**Target Population**
		motel vouchers, food, clothing, healthcare, counseling, utility assistance, showers and laundry, workforce development, men's homeless shelter, youth programs	
Children's Fund	San Bernardino	Emergency food, shelter, transportation, medical and dental care, education, clothing, beds, school supplies, hygiene products, and furniture	Youth
Community Action Partnership of San Bernardino County Energy Conservation Program	San Bernardino	No-cost home weatherization services and utility assistance	All
Community Action Partnership of San Bernardino County Family Development Program	San Bernardino	Motel vouchers, rental assistance, food, miscellaneous family self-sufficiency supportive services	Families
Community Action Partnership of San Bernardino County Food Bank	San Bernardino	Emergency food	All
Cornerstone Compassion Center	San Bernardino	Emergency food and clothing, health clinic	All
Department of Behavioral Health Homeless Program	San Bernardino	Supportive permanent housing and counseling services	Mentally ill persons
Frazee Community Center	San Bernardino	Emergency and transitional supportive services and assistance.	All
Hase and Associates Systems Inc.	San Bernardino	Prevention education, Hispanic outreach program, outpatient substance abuse treatment, employment assistance, and DUI program	All
Hernandez Community Center	San Bernardino	Food distribution and youth activities	All
Inland AIDS Project	San Bernardino	Emergency, transitional, and permanent housing; emergency rent and utility assistance; and residential care for chronically ill	Persons with HIV/AIDS
Inland Behavioral and Health Services	San Bernardino	Case management and various emergency services	All
Mary's Mercy Center	San Bernardino	Emergency food, clothing, and showers	All
New House Women with Children	San Bernardino	Substance abuse rehabilitation	Women with children
New House Inc.	San Bernardino	Substance abuse rehabilitation (39 beds)	Individuals
Operation Grace	San Bernardino	Emergency and transitional shelter	Female individuals
Our Lady of Fatima	San Bernardino	Emergency food	All
Our Lady of Hope	San Bernardino	Emergency food and clothing	All
Priscilla's Helping Hand	San Bernardino	Case management and housing, education, and employment assistance	Emancipated foster youths
Rolling Start Inc.	San Bernardino	Advocacy, housing and personal	Disabled persons

Table 25. Local Resources for Homeless and At-Risk of Homeless Persons			
Name	**Location**	**Services**	**Target Population**
		assistance referrals, and independent living skills training	
Salvation Army	San Bernardino	Emergency shelter (70 beds)	All
Salvation Army ARC	San Bernardino	Alcohol abuse treatment program (65 beds), transitional housing	Individual males
San Bernardino City Mission	San Bernardino	Emergency food, clothing, and hygiene items	All
San Bernardino County Department of Veterans Affairs	San Bernardino	Assistance with benefits and pension claims	Veterans and dependents
San Bernardino Sexual Assault Services	San Bernardino	Counseling, hospital, and court accompaniment	Victims of sexual assault
Set Free Christian Fellowship	San Bernardino	Substance abuse transitional living (35 beds)	Individuals
Veterans Alcoholic Rehab Program (VARP) Harris House	San Bernardino	Substance abuse rehabilitation and transitional housing	Veterans
VARP Gibson House for Men	San Bernardino	Substance abuse rehabilitation and transitional housing	Male veterans
VARP Gibson House for Women	San Bernardino	Substance abuse rehabilitation and transitional housing	Female veterans
Veronica's Home of Mercy	San Bernardino	Christian transitional housing (14 beds)	Youth and pregnant women
San Bernardino Vet Center	San Bernardino	Individual and group counseling	Veterans
Victory Outreach	San Bernardino	Substance abuse rehabilitation (10 beds)	All
Vista Guidance Center	San Bernardino	Drop-in center with clothing and laundry facilities	All
Source: Community Action Partnership of San Bernardino County 2020.			

3.9 Affordable Housing

At-risk affordable projects are those that could convert to market rents within 10 years from the planning period. State law requires that the City identify, analyze, and propose programs to preserve existing multifamily rental units that are eligible to convert to non-low-income housing uses due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions during the next 10 years.

3.9.1 Assisted Housing Developments at Risk

Government Code Section 65583(a)(8) requires an analysis of existing assisted multifamily housing developments for low-income renters that are eligible to change to market-rate units during the next 10-year period due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. The analysis must inventory each development by project name and address, the type of government assistance received, the earliest possible date of change from low-income use, and the total number of senior and non-senior units that could be lost from the local low-income housing stock. In addition, the analysis is required to assess the conversion risk and displacement of low-income tenants, estimate and analyze the costs of replacement versus preservation of at-risk units, identify entities qualified to preserve at-risk units, and identify financing and subsidy resources.

After extensive research of all assisted units in San Bernardino County, it was determined that all the affordable developments in the City are not currently at risk of conversion, with a "Low-Risk" designation, as shown in **Table 26, Assisted Units At Risk of Conversion.**

Table 26. Assisted Units At Risk of Conversion					
Name and Address	Housing Type	Affordable Units	Total Units	Program	Risk Level
Jeffrey Court Seniors (7367 Central Avenue)	Senior (Age 55+)	184	185	LIHTC	Low
Mountain Breeze Villas (25942 E Baseline Street)	Non-Targeted	167	168	LIHTC; HUD; CalHFA	Low
Sterling Village (7360 Sterling Avenue)	Large-Family	79	80	LIHTC	Low

Sources: California Housing Partnership Corporation, 2020; Office of the State Treasurer All Active California Tax Credit Allocation Committee Projects, 2019; HUD Office of Policy Development and Research, 2019
LIHTC = Low-Income Housing Tax Credit; CalHFA = California Housing Finance Agency

Affordable units may convert to market rate prices due to prepayment of HUD mortgages, opt-outs, expiration of Section 8 contracts, and expiration dates established by other funding sources. According to City records, no projects are at risk of converting to market rate during the planning period.

The County of San Bernardino currently owns and operates 12 public housing units in the City. There is no expiration date for the affordability of these units. The County Housing Authority also issues approximately 394 Housing Choice Vouchers in the City. Program participants may use their vouchers throughout San Bernardino County. There are no project-based Section 8 buildings in the City.

While Jeffrey Court Seniors is identified as low risk, the development is eligible to opt-out of affordability control since it was placed in service in 1999. The City will continue to monitor the development through subsequent Housing Element updates. In the event of affordability expiration, the City may pursue subsidizing the units, purchasing and placing a long-term affordability covenant on the units, or constructing replacement units. If the property owner does not extend the affordability covenant, the City will reach out to numerous qualified entities determined by HCD as having the ability to purchase and manage the property for continuous affordable housing.

3.9.2 Costs Analysis

To maintain the existing affordable housing stock, the City works to preserve the existing affordable units. The financial cost of preserving rental units compared to allowing them to be converted to market-rate depends on the rent for the apartment and the income level of the tenant. Typically, the amount of subsidy needed is the difference between what a household can afford to pay (no more than 30 percent of annual income) and the fair market rent for the unit. As of January 2021, the average rent for a one-bedroom unit in Highland was $1,364. Given San Bernardino County's 2020 State Income Limit was $48,200 for a low-income, two-person household, two-person household renters earning 80 percent of the median family income for the area would pay approximately 34 percent of earnings on rent. A subsidy of approximately $159 per month ($1,908 per year) would be required to meet the 30 percent limit. This number would reflect a lower-income level and would be higher for very low-income and extremely low-income households. Such trends in rental housing prices in the City indicate that market rental units will not be affordable to lower-income households throughout the planning period. Further, if the units were improved and rents were significantly increased, a financial resource would be necessary to pay the difference between the higher rents and the market rents to maintain affordability.

Another option is new construction. The final cost of constructing deed-restricted affordable housing units depends on whether the developer needs to purchase land or whether the City can transfer the land at a subsidized price, and how well the private developer's initial financial contribution can be leveraged with other funding sources. As no units have been identified as at-risk during the planning period, there is no further analysis regarding preservation and construction costs.

3.9.3 Preservation Resources

The City is committed to working with affordable housing property owners for solutions to prevent the expiration of affordability covenants. The City will develop relationships with property owners of existing affordable housing and with local affordable housing entities in an effort to attract interest and resources for preserving and constructing affordable housing units. Qualified entities are housing nonprofits that have been approved by the Community Development and Housing Department. To qualify, an entity must be able to manage the project, maintain affordability for at least 30 years or the remaining term of assistance, preserve the existing occupancy profile, maintain rents at a predetermined level of affordability, and agree to renew subsidies if available. Here are some local housing developers and managers that the City may contact:

- BRIDGE Housing Corporation
- California Housing Partnership Cooperation
- Jamboree Housing Corporation
- LINC Housing
- Mercy Housing
- Neighborhood Housing Services of the Inland Empire
- National Core

There are a number of programs to assist the City and County of San Bernardino in increasing and improving their affordable housing stock. The following paragraphs discuss available programs that provide financial resources for affordable housing units.

The City is a member of the San Bernardino County Urban County Consortium and participates in countywide efforts to receive federal housing and community development funds. These funds are potential resources for affordable housing construction, rehabilitation, and preservation. The San Bernardino County Consolidated Plan is an assessment of existing affordable housing and community development needs that informs HUD, as part of a Federal fund awarding process granted to participating jurisdictions like the City, to create and rehabilitate affordable housing for lower-income households. The assessment evaluates investments from the Community Development Block Grant, HOME Investment Partnerships (HOME), and Emergency Solution Grant programs. The Community Development Block Grant program was designed to improve low- and moderate-income communities through funding capital improvement and public services projects. The HOME funds are the primary funding available for the development of affordable housing. HOME funds are administered by the County of San Bernardino through a Notice of Funding Availability. Emergency Solution Grant programs assist individuals and families experiencing a housing crisis or homelessness to regain stability in permanent housing through No Place Like Home and California Emergency Solutions and Housing funding, and housing and legal assistance through the Housing and Disability Advocacy Program.

The Low-Income Housing Tax Credit program is the most significant financial resource to preserve and create new affordable housing by issuing tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The California Tax Credit Allocation Committee oversees the application and allocation process for all Low-Income Housing Tax Credit projects. Applicants compete for the funds, which are prioritized based on location, affordability terms, housing needs, and project amenities.

A shorter-term solution to affordable housing stock limitation is the County San Bernardino's Housing Choice Voucher program, which provides rent subsidies to extremely low- and very low-income households with a housing cost burden, or who are at risk of becoming homeless or being displaced. Voucher recipients rent housing from private rental owners and pay a portion of their income toward rent (usually up to 30 percent of their income). The San Bernardino County Housing Authority subsidizes the difference in monthly payments to the owner. The waiting list for this program is often closed and only opens every several years because the Federal government only provides funding to serve a certain number of households. New households are assisted as households currently in the program move off the program. Serving families through attrition causes long wait times even if a family may be eligible.

Appendix C: Constraints and Zoning Analysis

Table of Contents

HOUSING CONTRAINTS 3
1 Governmental Constraints 3
1.1 General Plan 3
1.2 Land Use and Development Code 4
1.3 Permitting Process 7
1.3.1 Single-Family Homes 7
1.3.2 Accessory Dwelling Units 7
1.3.3 Multifamily Housing 8
1.3.4 Mobile/Manufactured Housing 8
1.4 Special Needs Housing 9
1.4.1 Residential Care Facility 9
1.4.2 Boarding or Rooming Houses 10
1.4.3 Senior Housing 10
1.4.4 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing 11
1.4.5 Single-Room-Occupancy Units 13
1.5 Facilitating Affordable Housing 14
1.5.1 Residential High Density Special (HDS) Overlay and Greenspot Village & Marketplace Specific Plan 14
1.5.2 Lot Consolidation Incentives 14
1.5.3 Inclusionary Housing Ordinance 14
1.5.4 Density Bonus 15
1.6 Residential Development Standards 16
1.6.1 Parking Requirements 21
1.6.2 Building Codes 22
1.6.3 On- and Off-Site Improvements 22
1.7 Development Fees 23
1.8 Permit Approval Process 25
1.8.1 Staff Review Permit 25
1.8.2 Minor Design Review 27
1.8.3 Major Design Review 29
1.8.4 Conditional Use Permit 30
1.8.5 General Plan Amendment/Zone Change 31
1.8.6 Processing Time 32
1.8.7 Special Business License Provisions: Crime Free Multiple Family Rental Housing Program 33
1.9 Housing for Persons with Disabilities 34
1.9.1 Reasonable Accommodation 34
1.9.2 Residential Care Facilities 35
1.9.3 Senior Housing and Facilities 35

2 Market Constraints....37
2.1 Availability of Financing....37
2.1.1 Construction Financing....37
2.1.2 Mortgage Financing....38
2.2 Construction Costs and Construction Labor Shortage....39
2.3 Land Costs....40
2.4 Requests for Housing Developments at Reduced Densities....40
2.5 Length of Time between Project Approval and Applications for Building Permits....40
3 Environmental Constraints....42
3.1 Environmental Features....42
3.1.1 Biological Resources....42
3.1.2 Archaeological Resources....42
3.1.3 Water Resources....42
3.1.4 Energy Conservation....43
3.2 Environmental Hazards....43
3.2.1 Flooding....44
3.2.2 Landslides/Slope Instability....44
3.2.3 Earthquake....44
3.2.4 Liquefaction....44
3.2.5 Wildfire....44
3.3 Adequate Infrastructure Capacity....45
3.3.1 Dry Utilities....45
3.3.2 Sewer System....45
3.3.3 Water System....46
4 Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing....47
5 Quantified Objectives....50

Tables

Table 1. Residential General Plan Land Uses....3
Table 2. Residential Uses Permitted by Zoning District....5
Table 3. Residential Development Standards....17
Table 4. Residential Parking Standards....21
Table 5. Residential Development Fees....24
Table 6. Permit Processing Times....33
Table 7. Disposition of Home Loans (2019)....38
Table 8. Summary of Quantified Objectives for 6th Cycle (2021-2029)....50

HOUSING CONTRAINTS

Various factors influence the ability of the City of Highland (City) to meet its housing goals. These include governmental constraints, such as land use regulations, and nongovernmental constraints, such as market and environmental factors. This appendix provides the requisite analysis of potential and actual market, governmental, and environmental constraints to the production, maintenance, and improvement of housing pursuant to State law.

1 Governmental Constraints

The General Plan Land Use Element sets forth land use designations to guide the location, type, and intensity or density of permitted uses of land. The Land Use and Development Code implements the General Plan by providing specific direction and development standards within each of the use categories. These land use controls can facilitate or limit certain types of development.

1.1 General Plan

State law requires that each city have a General Plan that establishes policy guidelines for future development. The City of Highland General Plan is a long-range policy document that lays out the framework for all future growth and development within the City. The City of Highland adopted a comprehensive update of its General Plan in 2006. The Land Use Element describes the land use policies and designations used to guide physical development of the City through the location, distribution, and density of uses. Predominately a residential community, almost 60 percent of the City's 11,948 acres of land is planned for residential development.

As shown in **Table 1**, the Land Use Element describes seven land uses allowing housing, including a historic preservation district and one mixed commercial, office, and residential land use designation. The Planned Development (PD) designation allows flexibility in development standards to encourage creativity and site-specific design. The Planned Development (PD) district is an opportunity for master planning without a Specific Plan, potentially providing a cost savings to the developer, buyer, and renter.

Table 1. Residential General Plan Land Uses

Land Use Designation	Acres	Description
Agricultural/Equestrian	504	Rural and equestrian-oriented residential development at a maximum density of 2 units per acre.
Low Density	2,500	Single-family detached homes, including mobile homes, at a maximum density of 6 units per acre.
Medium Density	177	Small-lot single-family detached or attached housing, mobile homes, and multifamily housing at a maximum density of 12 units per acre.
High Density	46	Multifamily housing at a maximum density of 18 units per acre.
High Density Special	58	Multifamily housing from 20 to 30 units per acre.
Historic Village Residential	32	Low-density residential development within the Historic Village District at a maximum density of 6 units per acre.

Table 1. Residential General Plan Land Uses		
Land Use Designation	**Acres**	**Description**
Mixed Use	54	Horizontal and vertical mixed-use housing types at a maximum density of 18 units per acre.
Planned Development	3,708	Specific Plan areas in which housing types and densities may vary, but typically range from 5 to 12 units per acre.
Total	**7,079**	—

The program provided by the General Plan Land Use Element establishes 15 goals for future development within the City. These goals are intended to do the following:

- Plan for future growth
- Provide clarity in land use guidance
- Maintain a mix of development with urban, suburban, and rural character
- Create places for people to live, shop, work, learn, and recreate
- Protect and enhance Highland's neighborhoods
- Provide new housing opportunities
- Strengthen commercial opportunities
- Expand the employment base
- Ensure land use compatibility
- Preserve natural resources

The land use controls provided in the General Plan and Land Use and Development Code guide the development of new housing to meet existing and future needs, maintain the existing character, and improve neighborhoods and the housing stock.

1.2 Land Use and Development Code

Zoning regulations are intended to ensure that development does not negatively affect community health, safety, and welfare. The City's Land Use and Development Code regulates housing opportunities by establishing permitted uses and development standards. Several zoning districts respond to specific existing conditions, such as compatibility with the historic development in the original Highland Townsite, and appropriate design for busy transportation corridors.

Residential uses allowed in Highland are listed by Zoning District in **Table 2**. Uses permitted by right are indicated by the "P," conditionally permitted are indicated by the "C," and permitted uses that may require approval by the Community Development Director or designee are indicated by "SR." All permit types are defined in the Permit Approval Process Section.

New residential zoning districts, the Residential High-Density District (R-4), and the Residential High-Density Special Overlay (HDS) were established in the City's Land Use Development Code in 2011. These districts allow densities of 20 to 30 units per acre to facilitate the development of higher-density multifamily housing as part of a larger mixed-use community.

Table 2. Residential Uses Permitted by Zoning District											
Use	Agricultural Equestrian (A/EQ)	Single-Family Residential (R-1)	Two-Family Residential (R-2)	Multifamily (R-3)	Multifamily (R-4)	Residential High-Density Special (HDS)	Village Residential (VR)	Corridor Residential (R-2C)	Mixed Use		East Highland Village (EHV)
									Attached Mixed Use (MU)	Separated Multiple Use Project (MU)	
Single-Family Detached	P	P	SR	■	■	■	P	SR	■	SR	P
Single-Family Detached (2–4 units/parcel)	■	C	SR	SR	■	■	■	C	■	SR	■
Single-Family Detached (5+units/parcel)	■	■	C	C	SR	■	■	C	■	SR	■
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P	P
Single-Family Attached	■	■	C	SR	■	■	■	SR	C	SR	■
Multifamily Attached	■	■	C	C	SR	SR	■	C	C	SR	■
Mobile Home Subdivisions	SR	SR	C	C	■	■	■	■	■	■	■
Mobile Home Parks	■	C	C	C	■	■	■	■	■	■	■
Boarding or Rooming Houses (7+ persons)	■	■	C	C	C	C	■	C	■	■	■
Manufactured Homes (mobile homes with permanent foundation)	SR	SR	SR	SR	■	■	■	■	■	■	■

Table 2. Residential Uses Permitted by Zoning District											
Use	Agricultural Equestrian (A/EQ)	Single-Family Residential (R-1)	Two-Family Residential (R-2)	Multifamily (R-3)	Multifamily (R-4)	Residential High-Density Special (HDS)	Village Residential (VR)	Corridor Residential (R-2C)	Mixed Use		East Highland Village (EHV)
									Attached Mixed Use (MU)	Separated Multiple Use Project (MU)	
Board and Care Facility (7+ persons)	■	■	C	C	C	C	■	C	■	■	■
Senior Independent Living	SR	SR	C	C	C	C	SR	C	C	C	SR
Senior Congregate Care/Assisted Living	■	■	C	C	C	C	■	C	C	C	■
Convalescent Care	■	■	C	C	C	C	■	C	C	C	■
Supportive and Transitional Housing[1]	SR	SR	C	C	C	C	SR	C	■	■	SR

Source: City of Highland Land Use and Development Code, 2020.
Notes:
■ = Not permitted in this district.
P = Permitted subject to a consistency assessment.
SR = Permitted subject to approval of staff review permit application.
C = Permitted subject to approval of a Conditional Use Permit application.

1: Emergency shelters (excludes transitional housing and permanent support type housing facilities) are permitted in the Business Park (BP) District subject to approval of a department review permit application. Assisted living, live/work, multifamily dwellings, residential accessory structures, second units, senior housing, single-family dwellings, and townhomes are permitted by right in Planning Area 2 – Residential Villages and Planning Area 3 – Village Center of the draft Greenspot Village and Marketplace Specific Plan.

1.3 Permitting Process

Development review is the primary way to ensure that the construction of projects contributes in a positive manner to the community and quality of life. Residential development projects typically undergo several types of approvals. This section outlines the development review process for various types of housing (see Section 1.8.6, Processing Time, for average processing times for various project applications and reviews).

1.3.1 Single-Family Homes

Single-family detached homes are the most common housing type in Highland, making up approximately three-quarters of the entire housing stock. Single-family detached housing is permitted by right in four zoning districts (A/EQ, R-1, VR, and EHV), and permitted following staff review in two districts (R-2 and R-2C) and in separated multiple use projects in the MU District. Single-family attached housing, such as condominiums, is permitted in the R-2 zone with a Conditional Use Permit (CUP) and permitted in the R-2C and R-3 zones with a Staff Review Permit. Large single-family detached and single-family attached projects that require tract maps are ultimately reviewed by the Planning Commission. In 2009, the City merged the former Design Review Board with the Planning Commission in order to reduce the amount of time spent on design issues and to streamline the project approval process without diminishing quality. The Planning Commission now performs design review at the same time as other reviews that may be necessary depending on the permit at hand.

The City's Planning Division coordinates a pre-application meeting between a project's applicant and the Project Review Committee to provide applicants an early opportunity to present their project to the City before submitting a development application(s). This initial step has proven to be successful in the past because it discloses infrastructure or other issues that are more cost-effective to address early in the project design phase. Identifying potential issues prior to submitting a development application saves developers a significant amount of time and money. After the Planning Division determines the applications to be complete, they are routed to the Project Review Committee for their formal review and comments. Applications are also routed to utility companies and outside responsible agencies that have requested to be notified.

Once a project's environmental review and public comment process have been completed, the Planning Division provides a copy of all the comments to the applicant for review and discussion with the City's Project Review Committee. Once the comments have been reviewed by all parties, a public hearing before the City's Planning Commission is scheduled. The applicant is provided with a copy of the public hearing notice and staff report with condition and findings of facts for their review. The conditions clearly outline all the requirements needed to record a final map, as well as any conditions related to the construction of the housing units that are necessary to ensure adequate public health, safety, and welfare.

1.3.2 Accessory Dwelling Units

Accessory dwelling units (ADUs) may be detached from or attached to the primary single-family dwelling unit. ADUs are capable of providing housing below market prices, and often meet the special needs of young persons, older adults, and people with disabilities. In accordance with Assembly Bill 1866 (Government Code Section 65852.2), the City amended the Land Use and Development Code to make permitting ADUs in single-family zones a ministerial action that does not require public notice, public

hearing, or discretionary approval. Understanding that ADUs provide opportunities for affordable housing without changing the City's small-town character, Highland facilitates the development of attached and detached ADUs by permitting them in all residential zones.

~~Since the City's amendment of the Land Use and Development Code, there have been several updates to the State law regarding ADUs, such as parking requirements, reduced setbacks, and impact fee restrictions. **Program 12**, Accessory Dwelling Units, will revise the City's ADU ordinance (Section 16.44.180, Accessory Dwelling Units) to comply with recent changes in State laws.~~

Most recently, the City amended the Accessory Dwelling Units and Junior Accessory Dwelling Units Ordinance (Section 16.44.180 of the City's Land Use and Development Code) in 2021 to comply with several updates consistent with State law, Government Code Section 65852.2. As part of **Program 12, Accessory Dwelling Units**, of the Housing Element, the City will submit the updated ordinance to the State Department of Housing and Community Development (HCD) for their review and will incorporate amendments, as required by HCD. Further, the City will develop and adopt a program that incentivizes and promotes the creation of ADUs that can be offered at an affordable rent for extremely low, very low, low, or moderate-income households or households with special needs (AB 671, 2019).

From 2015 to 2020, the City approved eight ADUs. Additionally, one ADU permit was placed on holder and another ADU permit expired. Based on this record, the City assumes that two ADUs per year could be permitted during the planning period. As the City's older adult and college-age population increases, as is projected for the planning period, ADUs could help to provide housing for these populations as they can be an important housing resource for small, lower-income households.

1.3.3 Multifamily Housing

Multifamily housing, referred to as multiple-family, attached housing, makes up approximately 16 percent of the City's housing stock. Multifamily housing is currently conditionally permitted in the three multifamily zones (R-2, R-2C, R-3) and in attached mixed-use structures in the MU District. Multifamily housing is permitted following staff review in separated multiple use projects in the MU District, and permitted by-right in the R-4 zone and High-Density Special Overlay (HDS) subject to the City's Staff Review Permit. The CUP process is the City's opportunity to ensure compatibility with surrounding uses. The CUP process can occur concurrently with a Design Review (see Section 1.8, Permit Approval Process). Multifamily housing projects in the R-4 and HDS Districts are not subject to a CUP; however, they do require Major Design Review. The design review process considers the compatibility with design standards, such as setbacks, landscaping, and other basic aspects of project design, to ensure high-quality design.

The permitting procedure for a multifamily housing project is similar to that for a large, single-family detached or attached project. In the case of a hypothetical 50-unit multifamily project, the City's Planning Division will coordinate a pre-application meeting between the applicant and the Project Review Committee to identify potential issues that should be considered early in the planning and design process.

1.3.4 Mobile/Manufactured Housing

Single mobile home units placed on a permanent foundation, certified under the National Mobile Home Construction and Safety Standards Act of 1974 and constructed after October 1976, may be permitted

on individual lots in the A/EQ, R-1, R-2, and R-3 zones, as specified in the City's Land Use and Development Code (Section 16.40.180, Mobile Home and Modular Home Requirements), following staff review approved by the Community Development Director. The review ensures that the units comply with State and local standards of the underlying zoning district. Mobile home subdivisions are permitted under staff review in the A/EQ and R-1 zones, and conditionally permitted in the R-2 and R-3 zones, while mobile home parks are conditionally permitted in the R-1, R-2, and R-3 zones.

Pursuant to California Government Code Sections 65852.3 and 65852.7, certified mobile homes (manufactured homes) on a permanent foundation that are built to the United States Department of Housing and Urban Development Code are considered the same as single-family dwellings and are permitted on all lots zoned for single-family homes. Such housing is subject to the same requirements (e.g., planning, permitting, reviews) as site-built homes, except for certain architectural requirements. The Government Code specifies that a mobile home park shall be deemed a permitted land use on all land planned and zoned for residential land use as designated by the applicable general plan, provided, however, that a city may require a use permit. **Program 21**, Mobile Home Preservation, requires a report detailing relocation and displacement for any proposed conversion or closure of a mobile home park.

The Highland Land Use and Development Code defines manufactured housing as a structure, transportable in one or more sections, which is built on a permanent chassis and is designed for use with or without a permanent foundation when connected to the required utilities, including travel trailers for floodplain management purposes, and provides guidelines for single mobile homes and modular homes or manufactured dwelling units within the City's Land Use and Development Code, including design feature requirements consistent with California Government Code Section 65852.3. The permitted uses table for residential districts in the Land Use and Development Code includes mobile home subdivisions and mobile home parks.

1.4 Special Needs Housing

1.4.1 Residential Care Facility

State law prevents cities from imposing overly restrictive regulations on community care facilities. The Health and Safety Code (Sections 1500 et seq.) requires that group homes serving six or fewer persons be (1) treated the same as any other residential use and shall be considered a residential use of property by a single family; (2) allowed in all residential zones; and (3) be subject to the same development standards, fees, taxes, and permit procedures as those imposed on the same type of housing in the same zone, and no CUP, zoning variance, or other zoning clearance shall be required that is not required of a family dwelling of the same type in the same zone. Local agencies must allow these licensed care facilities in any area zoned for residential use, and may not require licensed residential care facilities for six or fewer persons to obtain conditional use permits or variances that are not required of other family dwellings. Large residential care facilities (those with seven or more residents) are subject to local land use regulations and other restrictions such as conditional use permit requirements.

According to the City's Land Use and Development Code, a residential care facility is a State-authorized, certified, or licensed facility that provides non-medical residential care, day treatment, therapeutic rehabilitative care, and adult day care, residential care for the elderly, transitional housing placement, substance abuse recovery or treatment facility, or foster family agency services for children or adults.

According to the permitted uses table in the Land Use and Development Code, residential care facilities serving seven or more persons, called "Board and Care Facilities" in the uses table, are conditionally permitted in all multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and commercial zones (CG, NC, PC, VC). The CUP process is outlined in **Section 1.8.4**, Conditional Use Permit. Requirements for discretionary permits may pose constraints to development but may be necessary for certain uses which could have an effect on the existing community. For example, Residential Care Facilities provide in-house treatment or rehabilitation programs on a 24-hour basis. These include drug and alcohol rehabilitation and recovery facilities. These facilities require a CUP in residential zones, as they are often a source of fear and concern for community members. The Planning Commission will only deny a CUP if the required findings cannot be met. **Program 18**, Residential Care Facilities, of the Housing Element includes an objective to amend the Zoning Code to permit residential care facilities serving six or fewer persons by right in all residential zones in accordance with the Welfare and Institutions Code Section 5116 and permit those serving seven or more in at least one zone without discretion.

To comply with the intent of fair housing laws and ensure clarity in the permitting process, the Housing Element **Program 18**, Residential Care Facilities, will update the Zoning Code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents. The program will create separate definitions and permitting processes for the two types of residential care facilities, ~~and~~ permit those serving six or fewer persons in all residential zones in which single-family homes are permitted, and permit those serving seven or more in at least one zone without discretion. This will ensure that licensed facilities (group homes/residential care facilities) are allowed in residential zones consistent with State law. ~~for small group homes (six or fewer) and with a CUP for large facilities (seven or more).~~

1.4.2 Boarding or Rooming Houses

Although a boarding or rooming house may provide housing to unrelated individuals, it is not considered a residential care facility. Highland's Land Use and Development Code defines a boarding or rooming house as a building containing a dwelling unit where lodging is provided with or without meals for compensation for seven or more persons. For six or fewer occupants, the City defers to requirements in the State's guidelines. A boarding or rooming house does not provide on- or off-site supportive services. Boarding or rooming houses are conditionally permitted in the R-2, R-2C, R-3, R-4, and HDS residential zones, and may not be located within 500 feet of the same use. Furthermore, to prevent a concentration of parolees, no more than one Federal, State, or juvenile justice parolee shall be allowed to live in boarding or rooming house at any one time, except if a boarding or rooming house has 10 or more dwelling units, then there may be one additional Federal, State, or juvenile justice parolee for every 10 dwelling units. The location and parolee restrictions were enacted in response to public concerns about boarding and rooming housing affecting community safety and welfare.

1.4.3 Senior Housing

With Highland's growing older adult population, it is important that a range of housing types located in well-resourced areas (e.g., near transit, jobs, parks) are available to serve their special needs. These can include housing such as smaller and more affordable units (including second dwelling units), senior housing, and various forms of care housing. Care housing that assists the special needs of older adults include senior independent living projects, residential care homes for older adults, congregate care, and convalescent care. Senior independent living projects are permitted with a Staff Review Permit in the

A/EQ, R-1, VR, and EHV zones, and conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and the mixed use zone (MU). Congregate care and convalescent care homes are conditionally permitted in multifamily, mixed use, and commercial zones. Residential care facilities, which can include residential care facilities for older adults per the City's definition, serving seven or more persons, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS).

1.4.4 Emergency Shelters, Transitional Housing, and Permanent Supportive Housing

California Senate Bill (SB) 2 (Cedillo) was approved in 2007 with the goal to remove zoning barriers for emergency shelters and transitional and supportive housing, and provides direction in the ways in which local governments address housing for those experiencing homelessness or those at risk of homelessness. SB 2 is intended to strengthen existing Housing Element requirements to provide for the development of emergency shelters and transitional and supportive housing.

Emergency shelters are the first step in a continuum of care program designed to allow people experiencing homelessness a temporary place of stay. As defined by subdivision (e) of Section 50801 of the Health and Safety Code, emergency shelter means housing with minimal supportive services for persons experiencing homelessness that is limited to occupancy of 6 months or fewer by a person experiencing homelessness, and where no individual or household may be denied emergency shelter because of an inability to pay.

SB 2 requires jurisdictions to identify a zone where emergency shelters are a permitted use without a CUP or other discretionary action. The identified zone(s) must have sufficient capacity to accommodate the needs, regardless of the demonstrated need, and have sufficient capacity to permit at least one year-round emergency shelter. State law (Government Code Section 65583(a)(4)) limits the development standards and locational restrictions that can be applied to emergency shelters. Emergency shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone except that a local government may apply written, objective standards that include all of the following:

- the maximum number of beds or persons permitted to be served nightly by the facility;
- sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not
- require more parking for emergency shelters than other residential or commercial uses within the same zone;
- the size and location of exterior and interior onsite waiting and client intake areas;
- the provision of onsite management;
- the proximity to other emergency shelters, provided that emergency shelters are not required to be more than
- 300 feet apart;
- the length of stay;
- lighting; and
- security during hours that the emergency shelter is in operation.

Emergency shelters serving 25 persons or fewer are permitted in the business park (BP) employment zone subject to approval of a Staff Review Permit application. The BP designation allows for light

industry, research and development, office uses, and business and commercial uses that support the employees and clients of the area, and commercial uses requiring large parcels. Should an emergency shelter be provided in the BP district, residents would benefit from access to public transit, retail uses, and regional employment growth in nearby businesses. Residents will also be connected to other areas of the community and adjacent cities by buses. The local bus transit service provider, Omnitrans, operates two routes that serve this area (Route 3 and Route 15). As outlined above, jurisdictions are permitted to limit the maximum number of beds or persons per shelter under State law. Regulating the number of beds or persons permitted, can potentially help prevent crowded shelter conditions. The importance of this was seen early in the Coronavirus (COVID-19) pandemic. Communities saw rapid transmission of COVID-19 in homeless shelters, particularly in congregate settings, where people shared living and sleeping spaces, sometimes in beds, cots, or bunks that were very close to one another[1]. Further, as fully analyzed below, the 25 person limit does not constrain the City's ability to demonstrate that the zone where emergency shelters are allowed by right includes sufficient capacity to accommodate the need for emergency shelter identified in the most recent point-in-time count conducted before the start of the planning period.

There are approximately 270 acres in the City designated as BP, generally located along the southwestern City boundary. A total of 116 acres in the BP designation are vacant with an average parcel size of 0.74 acres. Given the development standards in the BP zone, including the minimum parcel size requirement, there are approximately 25 vacant sites that ~~The average lot size is approximately 20,500 square feet and~~ could potentially accommodate a multi-service facility. As discussed above, all of the sites are within a half mile of public transit lines and near existing commercial and business uses, providing access to opportunities. Taking into account the 25-person limit for emergency shelters, the 25 sites still provide a potential capacity for approximately 625 beds. Based on the 2020 point-in-time count described in **Appendix B**, Community Profile, there were a total of 78 unsheltered adults in the City, meaning that the City theoretically has more than sufficient capacity of sites to accommodate the need for emergency shelter.

As defined in California Government Code Section 65582(j), transitional housing includes buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no fewer than 6 months from the beginning of the assistance. Supportive housing is defined by California Government Code Section 56682(f) as housing with no limit on length of stay, that is occupied by the target population,[2] and that is linked to an on-site or off-site service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Chapter 16.06, Definitions, of the City's Land Use and Development Code defines "supportive housing" and "transitional housing" per the definitions provided above. However, according to the permitted uses table in the Land Use and Development Code, supportive and transitional housing are permitted with a

[1] https://www.urban.org/urban-wire/winter-here-covid-19-limiting-shelter-capacity-what-will-it-mean-people-experiencing-homelessness

[2] "Target population" means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5, commencing with Section 4500, of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, older adults, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and people experiencing homelessness.

Staff Review Permit in the A/EQ, R-1, VR, and EHV zones and conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS).

~~Consistent with~~To remove or mitigate constraints that may exist related to zoning or permits for supportive and/or transitional housing and to comply with Government Code Section 65583, transitional housing and supportive housing shall be considered a residential use of property and shall be subject to the same development standards and permitting processes as the same type of housing in the same zone and in compliance with the occupancy limitations of Title 24 of the California Code of Regulations. Under California Assembly Bill (AB) 2162, supportive housing meeting specific standards shall be a use by right in all zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop.

The City updated its Land Use and Development Code in 2013 to comply with State law; however, there have been several updates to State law, as outlined above. As such, the Housing Element includes **Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing**, to permit transitional and supportive housing consistent with State laws and to amend the City's Emergency Shelters Ordinance (Section 16.44.270, Emergency Shelters) to comply with parking requirements set forth by AB 139, Quirk-Silva. **Program 28, Low Barrier Navigation Centers**, includes an update to the Land Use and Development Code to provide, by-right, approvals exempt per the California Environmental Quality Act (CEQA) to Low-Barrier Navigation Centers[3] meeting specific standards in areas zoned for mixed uses and nonresidential zones permitting multifamily uses, consistent with AB 101's requirements for Low-Barrier Navigation Centers.

1.4.5 Single-Room-Occupancy Units

Another potential source of housing for people experiencing homelessness or formerly experiencing homelessness are single-room-occupancy units. Single-room-occupancy units are very small, attached units intended for no more than one or two people. An agency or organization generally oversees the project and provides ongoing supportive services to promote self-sufficiency.

The City's Land Use and Development Code does not currently permit single-room occupancy units. Through **Program 19, Emergency Shelters, Transitional Housing, Permanent Supportive Housing, and Single Room Occupancy**, the City will amend the Zoning Code to identify a process by which single-room occupancies (SRO) can be permitted to further increase housing opportunities for extremely-low income households.

[3] "Low Barrier Navigation Center" is defined as a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.

1.5 Facilitating Affordable Housing

1.5.1 Residential High Density Special (HDS) Overlay and Greenspot Village & Marketplace Specific Plan

The City established a Residential High Density Special (HDS) Overlay in 2011 on approximately 52 acres zoned as Planned Development (PD). The HDS Overlay allows the permitting of up to 650 multifamily units at a minimum density of 20 units per acre and a maximum density of 30 units per acre. The HDS Overlay area is generally bound by Greenspot Road on the south, Eucalyptus Avenue on the north, Boulder Avenue on the east, and the City Creek wash basin on the west. The 52 acres is now located entirely within the Greenspot Village & Marketplace Specific Plan area, adopted in 2013.

The Greenspot Village & Marketplace Specific Plan is a master-planned, mixed-use development located within the area identified in the City's General Plan Land Use Element as the "Golden Triangle Community Policy Area." The Specific Plan consists of three planning areas. Planning Area 1 allows for commercial uses; Planning Area 2 allows for residential uses; and Planning Area 3 permits a mix of residential, commercial, entertainment, governmental, and professional office uses. The total number of dwelling units between Planning Areas 2 and 3 may not exceed 800. Planning Areas 2 and 3 allow development at density ranges of 20 to 30 and 18 to 40 dwelling units per acre and permit 500 to 700 units and 100 to 300 units, respectively; within that limit, dwelling units may be transferred between Planning Areas 2 and 3. As of November 2021, there are approximately 37 acres of vacant land within Planning Areas 2 and 3, providing a generous amount of land available for residential development. As fully discussed in **Appendix E, Sites Analysis and Inventory**, the available vacant land coupled with the higher densities permitted, purely residential uses and range in housing types allowed, and flexibility in standards and requirements afforded by the Specific Plan, remove and reduce constraints for residential uses and aim to facilitate affordable housing development.

1.5.2 Lot Consolidation Incentives

Lot consolidation can increase the efficiency of land use and create the critical mass needed for a quality multifamily housing project. The City has identified numerous vacant and underutilized parcels that have the potential to accommodate multifamily projects. Their development potential could be improved through lot consolidation.

Although the development community is aware of the inherent benefits of acquiring larger sites, the City seeks to promote this process. Through the implementation of **Program 23,** Lot Consolidation Incentive, of the Housing Element, the City is committing to providing expedited processing for the consolidation of lots identified in **Appendix E**, Sites Analysis and Inventory, as having the potential to accommodate lower-income households.

1.5.3 Inclusionary Housing Ordinance

The City's Land Use and Development Code's Inclusionary Housing Ordinance aims to facilitate the development and availability of housing affordable to a broad range of households with varying income levels within the City. It provides guidelines for the production of affordable housing at moderate-, low-, and very low-income levels; payment of an in-lieu fee; or dedication of land for affordable housing.

All new residential development projects within the City must dedicate at least 15 percent of the units for affordable housing. Restricted, for sale units must be sold to low- and moderate-income households. Rental projects must rent at least 10 percent of the units to very low-income households, with the remaining 5 percent of affordable units rented to low- or moderate-income households. In exchange for the construction of affordable units, the City allows unit size reduction and different interior finishes for affordable units, as long as they are of durable quality and consistent with the current California Building Code.

In lieu of constructing all or any affordable units on site, a developer may pay an affordable housing in-lieu fee of $3,750 per unit to the City. In lieu of building inclusionary units, the developer may also choose to dedicate land within the City to the City. Dedicated parcels must be suitable for the construction of inclusionary units and equivalent or greater in value than what would be produced by applying the City's in-lieu fee to the project. All in-lieu fees are deposited in an inclusionary housing fund to be spent on affordable housing development and programs.

The City provides regulatory relief for developers of sites that cannot accommodate affordable units. If the City determines that providing on-site inclusionary housing is infeasible, the developer may construct affordable units on another site within the City prior to or concurrently with construction of the on-site project. Should a developer provide more affordable units than required by the inclusionary ordinance, the developer may transfer credit for those affordable units to their next project in Highland or to another developer. However, the Inclusionary Housing Ordinance provides requirements that are inconsistent with the minimum density bonus and incentives outlined in the State's Density Bonus Law. **Program 4, Inclusionary Housing,** of the Housing Element includes a program to continue the City's Inclusionary Housing Ordinance to provide funding for affordable housing preservation, rehabilitation, and construction.

During the 2014–2021 Housing Element cycle, no inclusionary housing units were constructed. In lieu of construction, developers opted to pay the affordable housing in-lieu fee of $3,750 per unit. As of January 2021, the current balance from in-lieu fees is $569,000, and the funds have not yet been used for preservation or construction of affordable housing.

Commented [EVS1]: Note to City:
Please confirm if these in-lieu fee funds will be going towards the future Housing Authority project. If so, mention of the project should be added here.

yes. Too speculative at this point to mention the exact "project"

1.5.4 Density Bonus

A density bonus is an entitlement to build additional residential units above the maximum number of units allowed per the Municipal Code in exchange for providing affordable housing specified by as Government Code Sections 65915–65918.

For projects consistent with the applicable affordable requirements, jurisdictions must grant one density bonus, and, if requested by the applicant, incentives or concessions, and waivers or reductions of development standards depending on the percentage of affordable units. Concessions and incentives include reductions in site development standards or a modification of Zoning Code or architectural design requirements, such as a reduction in setback or minimum square footage requirements, approval of mixed-use zoning, or other incentives or concessions that result in actual cost reductions. In accordance with State law, projects that meet the minimum criteria for a density bonus are entitled to at least one concession and may be entitled to as many as four concessions depending on the amount of affordable housing provided.

The City's Land Use and Development Code (Section 16.40.090, Development Density) outlines the density bonuses and incentives or concessions that are available to affordable housing and qualifying residential projects; however, the City's Density Bonus Ordinance, approved in 2013, is no longer in compliance with the State's latest Density Bonus Law.

Under AB 2345 amending code Section 35915, which took effect on January 1, 2021, the maximum available density bonus for projects not composed exclusively of affordable housing increased from 35 to 50 percent. To receive the top bonus, a project must comply with unit replacement requirements and set aside at least 24 percent of units for low-income households, 15 percent of units for very low-income households, or 44 percent of for-sale units for moderate-income households. Bonuses between 35 and 50 percent will be granted on a sliding scale, while current affordability requirements to obtain a lesser bonus will remain unchanged. The City's Density Bonus Ordinance does not meet the current State law maximum density bonus of 50 percent.

Program 6, Density Bonus, will update the City's Density Bonus Ordinance to comply with the current State Density Bonus Law, including the provision for an increased bonus for 100 percent affordable developments and student affordable housing.

1.6 Residential Development Standards

The General Plan Land Use Element establishes the maximum density for housing and where it can generally be located within Highland. The Land Use and Development Code provides more specific residential development standards that determine building height, density, setbacks, parking, and other requirements. Development standards tailored to each zoning district and certain specific uses are provided to ensure quality design to protect the health, safety, and welfare of the public, as well as enhance the appearance of the community. Development standards improve the quality and livability of housing development in Highland.

Table 3 lists the minimum acceptable standards for development within the City's residential districts to ensure safe and attractive development without hindering the production of housing.

Table 3. Residential Development Standards									
Standard	**A/EQ**	**R-1**	**R-2**	**R-2C**	**R-3**	**R-4**	**HDS**	**VR**	**EHV**
Maximum Density (units per acre)	2.0	6.0	12.0	9.0	18.0	Max: 30.0	Max: 30.0	6.0	6.0
Minimum Density (units per acre)	—	—	—	—	—	Min: 20.0	Min: 20.0	—	—
Minimum Building Site (net area in square feet)	20,000	7,200	7,200	43,560 (1 acre)[1]	10,000	43,560 (1 acre)[1]	43,560 (1 acre)[1]	7,200	5,000[2]
Minimum Lot Width	100 ft.	60 ft.	60 ft.	22 ft.	100 ft., 110 ft. for corner lots	None	None	100 ft.	50 ft.
Minimum Lot Depth	120 ft.	100 ft.	100 ft.	40 ft.	100 ft.	None	None	100 ft.	100 ft.
Minimum Front Setback	35 ft., but 65 ft. from street centerline	25 ft., but 55 ft. from street centerline	20 ft.	15 ft. at any given point, but an average minimum of 20 ft.	25 ft.	15 or 25 ft.	15 or 25 ft.	15	19 ft.
Minimum Interior Setback[3]	10% of lot width	5 ft. and 10 ft.	5 ft. and 10 ft.	0 ft. for attached units and 3 ft. for detached units	10 ft.–15 ft.	15 ft. or 25 ft.	15 ft. or 25 ft.	An aggregate of 15 ft. compatible with adjacent setbacks	10% of lot width
Minimum Street Side Setback[3]	15% of lot width	15 ft.	15 ft.	15 ft. at any given point, but an average minimum of 20 ft.	20 ft.	15 ft. or 25 ft.	15 ft. or 25 ft.	15 ft.	10 ft.
Minimum Rear Setback	35 ft.	20 ft.	20 ft.	10 ft. for 1- or 2- story units	15 ft.–20 ft.	15 ft.	15 ft.	20 ft.	10 ft.

Table 3. Residential Development Standards									
Maximum Lot Coverage	30%	40%	40%	40%	60%	None	None	30%	30%
Maximum Height	35 ft. or 2 ½ stories, whichever is greater	35 ft. or 2 ½ stories, whichever is greater	35 ft. or 2 ½ stories, whichever is greater	35 ft. or 2 stories, whichever is greater	35 ft. or 2 ½ stories, whichever is greater	55 ft. (4 stories and loft)	55 ft. (4 stories and loft)	Compatible with surrounding buildings	35 ft. or 2 stories, whichever is greater[4]
Minimum Building Separation[5]	15 ft.	10 ft.	10 ft.	0 ft. for attached units and 3 ft. for detached units	15 ft.	Per Uniform Building Code	Per Uniform Building Code	10 ft.	10 ft.
Minimum Dwelling Unit Size (square feet)	800	800	800	800	800	Studio: 425 1 bedroom: 650 2 or more bedrooms: 800	Studio: 425 1 bedroom: 650 2 or more bedrooms: 800	800	800

Standard	Mixed Use		
	Attached Mixed Use Structures	Separated Multiple Use Projects Attached	Separated Multiple Use Projects Detached
Maximum Density (units per acre)	18	18	18
Minimum Building Site (net area in square feet)	None	10,000	4,000
Minimum Lot Width	None	80 ft.	50 ft.

Table 3. Residential Development Standards			
Minimum Lot Depth	None	100 ft.	80 ft.
Minimum Front Setback	0 ft. if public plaza of at least 400 square ft. and a minimum dimension of 15 ft. in each direction provided in front yard; 5 ft. if no public plaza provided in front yard	15 ft. average; 10 ft. minimum	10 ft.; 5 ft. for unenclosed porch
Minimum Interior Setback[3]	None if adjacent to commercial or office uses; If adjacent to residential uses, then 10 ft. if 2 stories or less, and 15 ft. if 3 or more stories	15 ft. if adjacent to commercial; If adjacent to residential uses, then 10 ft. if 2 stories or less, and 15 ft. if 3 or more stories	5 ft.
Minimum Street Side Setback[3]	None	15 ft.	10 ft.
Minimum Rear Setback	35 ft.	If adjacent to residential uses, then 10 ft. if 2 stories or less, and 15 ft. if 3 or more stories	15 ft.
Maximum Lot Coverage	30%	50%	40%
Maximum Height	35 ft. or 2½ stories, whichever is greater		
Minimum Building Separation[5]	15 ft.	10 ft.	
Minimum Dwelling Unit Size (square feet)	One-bedroom = 600 sq. ft. Two-bedroom = 800 sq. ft. Three-bedroom = 1,000 sq. ft.	One-bedroom = 800 sq. ft. Two-bedroom = 1,000 sq. ft. Three-bedroom = 1,200 sq. ft. Four-bedroom = 1,400 sq. ft.	

Source: City of Highland Land Use and Development Code, 2020.
ft. = feet; sq. ft. = square feet
1. R-2C parcels smaller than 1 acre in size may be developed if they cannot be consolidated with adjacent parcels and are either bordered on all sides by property zoned for non-R-2C uses, or bordered on three sides by roadways.
2. Lots may only be merged to meet minimum requirements. However, no lots shall be subdivided to meet minimum standards.

Table 3. Residential Development Standards
3: Except for development in the R-2C District, a minimum 10-foot setback shall be maintained for all two-story or higher elements. 4. Design of two-story unit buildings or additions within the East Highland Village (EHV) District shall be in compliance with Highland Municipal Code Chapter 16.16.040(F), East Highland Village Design Guidelines. 5: Minimum distance between buildings includes main dwellings and accessory structures. Within a planned development, building separations may be reduced to 0 feet, provided that fire walls are to Uniform Building Code standards and subject to review and approval of the Forestry and Fire Warden Department.

1.6.1 Parking Requirements

Parking requirements must relate to the housing type to provide adequate and appropriately located parking facilities. Adequate parking for residential projects contributes to the value of a project, the safety of residents, its appearance, and livability. However, excessive parking standards that do not reflect actual parking demand can unduly increase development costs by reducing the potential land availability for additional units or project amenities. Cities statewide are also finding that parking is a contributing constraint to building affordable housing, reflective in the cost of one parking space.

Reductions in parking requirements are currently made possible through parking studies for senior housing types, and the Community Development Director may approve reduced parking requirements for projects that incorporate affordable units but do not qualify for density bonus incentives. Additionally, **Program 33**, Reduced Parking Requirements, will provide a process by which parking requirements can be reduced for religious institutions in exchange for housing development. **Table 4** displays City residential parking requirements.

Table 4. Residential Parking Standards

Use	Minimum Off-Street Requirements
Single-Family Detached[1]	Resident parking: 2 enclosed garage spaces Guest parking: If guest parking is not permitted on the street, then one visitor space per unit is required within 100 feet of each unit's frontage and cannot be tandem
Second Units	Resident parking: 1 additional off-street parking space, tandem allowed, allowed in the front yard setback
Single-Family Attached and Multifamily (R-2, R-2c, R-3)[2,3]	Resident Parking Studio: 1 covered or garage space assigned to each unit 1 bedroom: 1 covered or garage space, and .5 uncovered space 2 or more bedrooms: 1 covered or garage space and 1 uncovered space Guest parking: On-street parking can count for visitor parking if the spaces are within 250 feet of each unit's frontage, otherwise 0.5 uncovered space per unit is required
Multifamily (R-4) [4,5]	Resident Parking Studio and 1 bedroom: 1.5 per unit (at least 1 space within a garage or carport) 2 bedrooms: 1.9 per unit 3 bedrooms: 2.1 per unit 4 bedrooms: 2.4 per unit Guest parking: 0.3 spaces per unit
Senior Housing	Resident parking: 1 covered space per unit Guest parking: 0.25 space per unit (can be uncovered)
Senior Congregate Care[6]	Resident parking: 0.5 covered spaces per unit or as determined by the Planning Commission. For multiple-family units, the parking shall be within 150 feet of the dwelling it serves Guest parking: 0.25 space per unit (can be uncovered)
Mobile Home Parks and Subdivisions	Resident parking: 2 spaces per unit, tandem allowed Guest parking: 1 space for each 5 units or fraction thereof
Model Home Complexes[7]	3 spaces per model home plus 1 space per salesperson

Source: City of Highland Land Use and Development Code, 2020.

1: Within the VR district, no more than a two-car space and no less than a one-car space shall be provided within a garage, and the exterior garage door shall be a minimum of 45 feet from the front property line.

2: For R-2 and R-2C districts, covered spaces may be required to be in enclosed garage. If it is not adjacent, the garage shall be within 150 feet of the unit being served.

3: Covered spaces for apartment buildings are garage spaces.

4: Minimum of one parking space shall be covered within a garage or carport.

5: Guest spaces may be uncovered.

6: Applicant shall submit a parking study for reduced parking standards.

7: On-street parking adjacent to the model home complex may be counted toward the parking requirement if it is found that on-street parking will not impact residential parking and will not obstruct traffic flow.

1.6.2 Building Codes

Building and safety codes regulate construction and design methods to protect public health, safety, and welfare. However, these codes have the potential to constrain the development of housing. Highland has adopted and enforces the 2019 California Building Code. Except for seismic standards and some additional requirements for fire hazards, the City's building codes do not impose additional requirements that would materially raise the cost of housing. These types of improvements are common for all cities in San Bernardino County.

Code enforcement is a critical component of retaining quality neighborhoods and residential structures. The City employs full-time building inspectors and code enforcement officers to examine properties. As part of the City's residential rental enhancement program, the owner or occupant of any residential rental unit may request that the City conduct both an interior and exterior inspection of said residential rental unit(s). Inspections may be based upon, but are not limited to, receipt of complaints from occupants, local agencies, or other third parties.

The City's rental inspection program includes a self-certification inspection process conducted by the owner of a residential rental unit, and subsequent right-of-way inspection from the public right-of-way to certify that health and safety, building code, and fire code violations do not exist on the rental unit. The program ensures rental housing is well-maintained, safe, and adequate for habitation. **Program 2**, Residential Rental Enhancement and Rehabilitation, will continue to educate landlords and property owners about compliance with applicable City codes, procedures of the Residential Rental Enhancement Program, and how to notify code enforcement of any violations.

1.6.3 On- and Off-Site Improvements

The City of Highland requires that adequate access, landscaping, lighting, water, and sewer improvements accompany residential development or the expansion of existing residential projects. Typical off-site improvements include curb, gutter, and sidewalk installation, and the undergrounding of existing overhead utility lines. As a condition of approval, the City may require the dedication of improvements, such as rights-of-way, easements, and the construction of reasonable on- and off-site improvements, to serve the project. These types of improvements are common for all cities in San Bernardino County. Therefore, these on- and off-site improvement standards would not make it less financially feasible to build housing in one jurisdiction over another.

1.6.3.1 Streets

All residential projects must provide appropriate roadways consistent with the City's Circulation Element and adopted road standards.

Collector streets require a minimum 40 feet wide curb-to-curb and are, generally, 44 feet, curb-to-curb, within 66-foot rights-of-way. Residential local streets generally require a 36-foot-wide right-of-way. The City does not require infill projects to provide road improvements beyond those necessary for safe access. This reduces the cost of infill housing development, a savings that may be passed on to the future buyer or renter. For any area of the City, additional improvements, easements, and other dedications may be identified during Site Plan Review.

1.6.3.2 Curbs, Gutters, and Sidewalks

While much of west Highland is developed with curbs, gutters, and sidewalks, there are some infill sites without such amenities.

Greenfield sites on the east side are also often in need of such improvements. All new residential development is required to provide a public sidewalk system with curbs and gutters unless deemed unnecessary by the Planning Commission. Public sidewalks are adjacent to public streets and have a minimum width of 5 feet.

Interior walkway systems may have varying widths, with a minimum width of 4 feet. The cost of these improvements increases development costs but are necessary to facilitate pedestrian access and movement in urban areas of the City, and to enhance the safety of pedestrian traffic.

1.6.3.3 Water, Sewer, and Storm Drains

Consistent with State law, all projects must demonstrate the ability to meet water, sewer, and drainage requirements consistent with San Bernardino Flood Control District's Comprehensive Storm Drain Plan. Fees and infrastructure requirements are established by the East Valley Water District (EVWD) and similar for all communities in the region. Careful site design and location can reduce or mitigate the associated cost of these improvements. For example, vacant land in an infill area could provide affordable housing where there is existing and adequate water, sewer, and drainage infrastructure.

1.7 Development Fees

A variety of fees and assessments are charged by the City and other agencies to cover the cost of processing development permits and providing local services. These fees are necessary to ensure quality project review and to cover costs associated with the impact of new housing. Development fees and exactions increase the cost of development. These costs are passed down to the homeowner and renter, reducing the affordability of housing.

Community development and engineering fees are established to cover the cost of staff review. Without entitlement processing fees, the City would be unable to provide quality review of each project, resulting in inappropriate or inadequate development. These fees offset the City's development review costs and are not designed to increase the cost of development. The affordable housing fee is a per-unit fee that may be paid by the applicant in lieu of providing affordable housing, as discussed in Section 1.5.3, Inclusionary Housing Ordinance.

When processing a Major Design Review and CUP concurrently, the City provides relief to the applicant by only charging one deposit up-front. The City only takes a deposit for the CUP and applies any unused funds from the CUP deposit to cover the design review. This prevents the applicant from spending a financial resource earlier than necessary.

Development impact fees are charged on a per-unit basis to provide funds to offset the anticipated impacts of population growth. New housing, and therefore more residents, may result in an increase in vehicle trips, park usage, school enrollment, and emergency service calls. Development impact fees are carefully created to ensure that quality services and facilities are provided to Highland residents without unduly burdening development. The City annually reviews its development impact fees to ensure the fees are fair and adequate. **Table 5** shows fees charged for new housing projects in Highland.

Table 5. Residential Development Fees		
Fee	**Single-Family Attached**	**Single-Family Attached/ Multifamily**
Minor Project (three or fewer dwelling units)		
Community Development Fees		
Inclusionary Housing	$3,750.00	$3,750.00
Staff Review Permit	$45.00	$45.00
Minor Design Review – Fixed Fee	$3,450.00	$3,450.00
Minor Conditional Use Permit – Fixed Fee	$1,425.00	$1,425.00
Community Development Fees/Deposit Per Unit	$8,670.00	
Engineering Fees[1]		
Parcel Map Review (≤4 lots)[2]	$5,300.00	$5,300.00
Impact Fees		
Law Enforcement	$276.23	$436.83
Fire Suppression	$981.10	$318.42
Local Circulation System	$4,582.61	$3,058.86
Regional Circulation System	$13,289.35	$8,872.35
Regional Flood Control	$1,068.24	$457.13
General Facilities, Vehicles, and Equipment	$1,224.67	$1,224.67
Library	$1,126.68	$1,084.50
Community Center	$1,404.31	$1,351.22
Park Land Acquisition & Park Facilities Development	$4,573.40	$4,400.64
Total Fees Per Unit[3]	$37,196.64	$29,874.61
Major Project (more than three units)		
Community Development Fees		
Inclusionary Housing	$3,750.00	$3,750.00
Major Design Review Deposit[2, 4]	$8,500.00	$8,500.00
Major Conditional Use Permit Deposit[2, 4, 5]	$11,100.00	$11,100.00[5]
Community Development Fees/Deposit Per Unit	$23,350.00	
Engineering Fees[1]		
Parcel Map Review (≤4 lots)[2]	$5,300.00	$5,300.00
Final Tract Map Review (≥5 lots)[2, 4]	$15,300.00	$15,300.00
Impact Fees		
Law Enforcement	$276.23	$436.83
Fire Suppression	$981.10	$318.42
Local Circulation System	$4,582.61	$3,058.86
Regional Circulation System	$13,289.35	$8,872.35
Regional Flood Control	$1,068.24	$457.13
General Facilities, Vehicles, and Equipment	$1,224.67	$1,224.67
Library	$1,126.68	$1,084.50
Community Center	$1,404.31	$1,351.22
Park Land Acquisition & Park Facilities Development	$4,573.40	$4,400.64
Total Fees Per Unit[3]	$72,476.64	$65,154.61

Source: City of Highland Planning Division, 2020.
1. Some engineering fees not included, such as grading plan check and grading inspection, because fee is based on project specifics such as a dollar amount per cubic yard of soil moved.
2. RCS fully burdened hourly rate for all personnel involved, plus any out-of-pocket expenses for contract personnel, special equipment or supplies, other State or county fees applicable against an initial deposit.
3. Total fees per unit, including community development fees/deposit per unit, engineering fees, and impact fees listed in this table.
4. For projects that are deemed to be less complex after review by the DRC, the amount of the initial deposit can be reduced accordingly by the Community Development Director.
5. Major Conditional Use Permit Review Deposit will not be needed for projects on multifamily sites identified in the Housing Element as having potential to accommodate the lower-income Regional Housing Needs Allocation.

1.8 Permit Approval Process

Highland's permitting process is designed to ensure high-quality and aesthetically pleasing development that is compatible with adjacent uses and the City's rural charm. Development and design review fees, as well as the time these processes take, increase the cost of constructing new housing or rehabilitating existing units. To ensure that the permit approval process is not overly burdensome, the City established the "Come Home to Highland" program, which commits the City to being an active partner in providing housing. This program serves as an action plan for City staff to follow when reviewing all commercial and residential development projects. The program is intended to do the following:

- Improve and enhance Highland through the promotion of its residential lifestyle and family-oriented community
- Encourage housing maintenance, rehabilitation, development, and occupation
- Encourage cooperation between City government, local service providers, and residents in facilitating responsible growth

The City of Highland is committed to the following action plan to facilitate and streamline the development review process:

- The fees to process entitlement should be deposit, and an accounting of time by which staff processes the entitlement shall be provided to the project applicant within 30 calendar days of the project's conclusion.
- Pre-application meetings should be offered free of charge.
- Upon acceptance of an application for an entitlement, the Community Development Department and Public Works Department shall bring the application before the appropriate reviewing body within 90 days of acceptance, barring special environmental, traffic, or similar technical report requirements.
- Fixed fees for plan checking and inspection services upon the issuance of permits.
- First plan check shall take no more than 2 weeks, and if determined to take longer, staff shall notify applicant as to the reasons for the delay.

Three levels of decision-making bodies in the City govern the development review process: The Community Development Department, the Planning Commission, and the City Council.

Applicants are encouraged to submit a pre-application to meet with City staff to discuss a project prior to submitting a formal application. This process provides the applicant with an opportunity to make changes that will ultimately save time and money by having a complete application from the start. When an application is determined complete (within 30 days, as required by the Permit Streamlining Act), the Planning Division indicates whether or not a use requires discretionary review. The "Come Home to Highland" program guarantees that any request for an entitlement that requires approval by the Planning Commission be presented to the necessary body within 90 days of the application being deemed complete (excluding time for CEQA review). Limiting processing time reduces the impact of design review and other forms of discretionary review. There are several types of review necessitated by certain project characteristics, as described below.

1.8.1 Staff Review Permit

A Staff Review Permit is a review of the project use to ensure compatibility with the City's land uses and development standards. Approval is determined by the Community Development Director or their

designee (typically the City's Planning Technician). The Staff Review Permit is processed concurrently with the Minor Design Review process, when applicable. Following a review of the application, the Community Development Director shall prepare a written decision which shall contain the findings of fact upon which said decision is based. A Staff Review Permit application may be approved in whole or in part, with or without conditions, if the following findings can be made:

1. The proposed use will be arranged, designed, constructed and maintained to be compatible with the character of the area as intended by the general plan, and is consistent with the goals, objectives, policies and programs of the general plan;
2. The proposed use is permitted within the applicable district, or specific plan, and complies with all applicable zoning provisions;
3. The proposed use, together with applicable conditions, will not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the vicinity;
4. The architecture and landscaping proposed observe community standards as described in the adopted general plan, ensuring visual relief protecting the character of adjacent development and providing an attractive environment for the public's enjoyment;
5. The proposed use would not result in significant impact to the environment;
6. All other state and federal permits have been obtained; and
7. The site is reasonably safe from flooding.

In approving a Staff Review Permit, the Community Development Director shall require that the use and development of the property conform with the approved site plan, architectural drawings and statements submitted in support of the application. Such conditions may include, but are not limited to, the following:

1. Setbacks, yard area and open spaces;
2. Fences, walls, and screening;
3. Parking, parking areas and vehicle ingress and egress;
4. Landscaping and maintenance of landscaping and grounds;
5. Regulation of signs;
6. Control of noise, vibration, odor and other potentially dangerous or objectionable elements;
7. Limits on hours of operation;
8. Time period for compliance with conditions of approval;
9. Perimeter roads and properly maintained fuel modification areas with fire hazard zones I and II; and
10. Other conditions as may be determined to assure that development will be in accordance with the intent and purposes of this title.

Modification or revision of an approved Staff Review Permit may be requested by the applicant. A modification or revision to an approved staff review permit may include, but shall not be limited to, change in conditions, expansion, intensity, or hours of operation. The requested modification or revision shall be processed in the same manner as the original Staff Review Permit.

The Staff Review Permit approval by the Community Development Director or designee is final unless appealed to the Planning Commission. The Planning Commission's determination is appealable to the City Council.

The Staff Review Permit process is not found to be a constraint to development. It provides an objective and necessary process to ensure consistency with the City's General Plan and Zoning Ordinance and the public health, safety and welfare.

1.8.2 Minor Design Review

The Planning Division provides ~~this form of~~minor ~~administrative~~ design review administratively for permitted housing projects with three or fewer units to ensure compliance with City's land use and development standards. The Planning Division makes standard findings regarding project design, which include compliance with adopted residential design standards and consistency with the City's General Plan Land Use Element and Community Design Element.

~~Approval is determined by the Community Development Director or designee and is deemed final unless appealed to the Planning Commission. The Community Development Director may also, at his or her option, refer any minor design review to the Planning Commission for action. The Planning Commission's determination can then be appealed to the City Council.~~

An application for minor design review is required for residential projects with three or fewer dwelling units, commercial, industrial and institutional projects not subject to design review which involve the issuance of a building permit for construction or reconstruction of a structure which meets one or more of the following criteria:

1. Structural additions which do not result in an increase of more than 50 percent of the floor area of the existing building;
2. The construction and/or placement of silos, satellite dishes, antennas, private water tanks, roof- or ground-mounted equipment visible from the public street or similar structures and equipment on existing developed properties as determined by the community development director;
3. Signs as required by Chapter 16.56 HMC;
4. Residential construction involving three or fewer dwelling units; or
5. Landscape plans for projects requiring minor design review.

The Community Development Director is authorized to approve or deny applications for design review and to impose reasonable conditions upon such approval, subject to the right of appeal. Conditions may include, but shall not be limited to, requirements for open spaces, screening and buffering of adjacent properties, fences and walls; requirements for installation and maintenance of landscaping and erosion control measures, regulation of vehicular ingress and egress, and traffic circulation; regulation of signs; grading requirements; regulation of hours of operation; establishment of development schedules or time limits for performance or completion of improvements; and such other conditions as the Community Development Director may deem necessary to ensure compatibility with surrounding uses; to preserve the public health, safety and welfare; and to enable the Community Development Director to make the findings necessary for approval. The Community Development Director may at his or her option refer any minor design review to Planning Commission for action. Any determination of the

community development director may be appealed to the planning commission within 10 calendar days of the community development director action.

Design Review and Minor Design Review Criteria

The criteria for major and minor design review is based on the following:

1. The design and layout of the proposed development is consistent with the applicable elements of the general plan; any city design guidelines which may be established; and any adopted architectural criteria for specialized areas such as designated historic districts, theme areas, specific plans or planned developments.
2. The design and layout of the proposed development will not unreasonably interfere with the use and enjoyment of neighboring existing or future developments, and will not create a traffic or pedestrian hazard.
3. The design of the proposed development is compatible with the character of the surrounding neighborhood and will maintain a harmonious, orderly and attractive development.
4. The design of the proposed development would provide a desirable environment for its occupants and visiting public as well as its neighbors through good aesthetic use of materials, texture and color that will remain aesthetically appealing and will retain a reasonably adequate level of maintenance.

Design Review and Minor Design Review Findings

The ~~Planning Commission, or the~~ Community Development Director ~~as applicable,~~ shall make the following findings before approving a ~~design review or~~ minor design review application:

1. That the proposed project is consistent with the general plan or specific plan;
2. That the proposed use is in accordance with the objectives of this title, and the purposes of the land use district in which the site is located;
3. That the proposed use is in compliance with city design and landscape standards and criteria; and
4. That the proposed use, together with the conditions applicable thereto, will not be detrimental to the public health, safety, or welfare or will not be materially injurious to properties or improvements in the vicinity of the site.

Adjacent property owners shall be notified by mail of the date, time and nature of the design review at least 10 days prior to the public meeting. Any determination of the Community Development Director may be appealed to the Planning Commission within 10 calendar days of the Community Development Director action.

These findings are consistent with those permitted in accordance with 65589.5(d) and are necessary to ensure consistency with the City's General Plan and Zoning Ordinance. Through **Program 30, Objective Design Standards**, the City will ensure that any newly developed design standards are objective, consistent with the requirements of SB 330, 2019. Further, through **Program 8, By-Right Development on Previously Identified Sites**, the City will permit eligible developments without discretionary action. Further, as detailed in **Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing**, and **Program 28 Low-Barrier Navigation Centers**, the City will ensure that these uses are permitted as detailed, without discretionary action.

1.8.3 Major Design Review

Major Design Review applies to new housing projects consisting of four or more units. Major Design Review is performed by the Planning Commission. Major Design Review provides the Planning Commission with an opportunity to assess a project for consistency with the applicable elements of the City's General Plan and design guidelines, and identify potential design issues that may detract from the aesthetics, health, and safety of neighborhoods. These projects will be reviewed for consistency with the design and development standards provided in the Land Use and Development Code, General Plan Land Use Element, and Community Design Element. Planning Commission review takes place during the time period the development application is routed for agency comments and/or the CEQA process, thus minimizing overall processing time for the project. Planning Commission approval is final unless appealed to the City Council.

An application for design review by Planning Commission is required for all commercial, industrial, institutional, and residential projects of four or more dwelling units involving the issuance of a building permit for construction or reconstruction of a structure which meets the following criteria:

1. New construction on vacant property;
2. Structural additions which are equal to 50 percent or more of the floor area of existing on-site buildings;
3. Reconstruction projects which are equal to 50 percent or more of the floor area of existing buildings;
4. Signs as required by the sign regulations, Chapter 16.56 HMC;
5. Projects involving a substantial change or intensification of land use, such as the conversion of an existing residential structure to an office or commercial use;
6. Outdoor storage areas;
7. Landscape plans for projects requiring design review; or
8. Major public works projects, as feasible.

Planning Commission is authorized to approve or deny applications for design review, and to impose reasonable conditions upon such approval, subject to the right of appeal. Conditions may include, but shall not be limited to, requirements for open spaces, screening and buffering of adjacent properties, fences and walls; requirements for installation and maintenance of landscaping and erosion control measures, regulation of vehicular ingress and egress, and traffic circulation; regulation of signs; grading requirements; regulation of hours of operation; establishment of development schedules or time limits for performance or completion of improvements; and such other conditions as Planning Commission may deem necessary to ensure compatibility with surrounding uses; to preserve the public health, safety and welfare; and to enable Planning Commission to make the findings necessary for approval.

The Planning Commission shall make the following findings before approving a major design review application:

1. That the proposed project is consistent with the general plan or specific plan;
2. That the proposed use is in accordance with the objectives of this title, and the purposes of the land use district in which the site is located;
3. That the proposed use is in compliance with city design and landscape standards and criteria; and

4. That the proposed use, together with the conditions applicable thereto, will not be detrimental to the public health, safety, or welfare or will not be materially injurious to properties or improvements in the vicinity of the site.

~~See the Design Review criteria and findings listed above under Section 1.8.2, Minor Design Review.~~ Property owners within 300 feet of the project shall be notified by mail of the date, time and nature of the design review at least 10 days prior to the public meeting.

These findings are consistent with those permitted in accordance with California Government Code Section 65589.5(d) and are necessary to ensure consistency with the City's General Plan and Zoning Ordinance. Through **Program 30, Objective Design Standards**, the City will ensure that any newly developed design standards are objective, consistent with the requirements of SB 330, 2019. Further, through **Program 8, By-Right Development on Previously Identified Sites**, the City will permit eligible developments without discretionary action. Further, as detailed in **Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing** and **Program 28 Low-Barrier Navigation Centers**, the City will ensure that these uses are permitted as detailed, without discretionary action.

1.8.4 Conditional Use Permit

The CUP process is the City's opportunity to ensure compatibility with surrounding uses, and this review can occur concurrently with Major Design Review. The existing Land Use and Development Code requires a CUP for multifamily projects, with the exception of single-family attached duplex, triplex, and fourplex housing in the R-3 and R-2C zones permitted by Staff Review Permit; multifamily attached projects in the R-4 or HDS districts; and multifamily uses on multifamily sites identified in the Housing Element. In the case of the R-4 and HDS, only a Design Review Process is required.

The Planning Commission is responsible for reviewing all applications that require a CUP and the design review of a project. Typical findings for CUP approval include consistency with the goals, policies, and objectives of the General Plan; suitability of the site for the proposed use or development; and adequacy of water, sanitation, and utilities. Following a review of the application, the Planning Commission shall prepare a written decision which shall contain the findings of fact upon which such decision is based. The Planning Commission, or City Council on appeal, may approve a conditional use permit application in whole or in part, with or without conditions, only if all of the following findings of fact can be made in an affirmative manner:

1. The proposed use is permitted within the subject district pursuant to the provisions of this section, and complies with all of the applicable provisions of this title; and is consistent with the goals, policies, and objectives of the Highland general plan, and with the applicable development policies and standards of the city;
2. The proposed use would not impair the integrity and character of the district in which it is to be established or located;
3. The site is suitable for the type and intensity of use or development which is proposed;
4. There are adequate provisions for water, sanitation, and public utilities and services to ensure public health and safety;
5. The proposed use will not be detrimental to the public health, safety, or welfare, or materially injurious to properties and improvements in the vicinity; and
6. The proposed use would not result in a significant effect on the environment.

In granting a conditional use permit, the Planning Commission, or the City Council on appeal, shall require that the use and development of the property conform with a site plan, architectural drawings,

or statements submitted in support of the application, or with such modifications thereof as may be deemed necessary to protect the public health, safety, and general welfare and to secure the objectives of the general plan. The Planning Commission, or the City Council on appeal, may also impose such other conditions as may be deemed necessary to achieve these purposes, including, but not limited to, the following matters:

1. Requirements for setbacks, yard areas, and open spaces.
2. Fences, walls, buffers, and screening.
3. Parking, parking areas, and vehicular ingress and egress in addition to the minimum requirements of Chapter 16.52 HMC.
4. Landscaping and maintenance of landscaping and grounds.
5. Regulation of signs.
6. Control of noise, vibration, odors, and other potentially dangerous or objectionable elements.
7. Limits on hours of operation or duration of approval.
8. Time period within which the proposed use shall be developed.
9. Requirements for street improvements and dedications.
10. Building design and elevations.
11. Such other conditions as may be determined to assure that development will be in accordance with the intent and purposes of this title.
12. Reasonable guarantees of compliance with required conditions, such as a deed restriction or requiring the applicant to furnish security in the form of money or surety bond in the amount fixed by the administering agency.
13. Requirements for periodical review by the planning commission, and such other conditions as the planning commission may deem necessary to ensure compatibility with surrounding uses, to preserve the public health, safety, and welfare, and to enable the commission to make the findings required by this subsection.

Revisions or modifications of conditional use permits may be requested by the applicant and shall be processed in the same manner as the original conditional use permit. Further, the Planning Commission may periodically review, modify, or revoke a conditional use permit to ensure that it is being operated in a manner consistent with conditions of approval or in a manner which is not detrimental to the public health, safety, or welfare, or materially injurious to properties in the vicinity. If, after review, the commission deems that there is sufficient evidence to warrant a full examination, then a public hearing date shall be set. At such public hearing, the planning commission may modify or revoke the permit pursuant to the provisions of Section 16.08.220, Revocation of Permits, of the Land Use and Development Code.

Design review is based on criteria included within the General Plan Land Use Element and Community Design Element. The CUP (with Major Design Review) process typically takes 9 to 12 weeks, not including the time required by CEQA if an Environmental Impact Report is necessary.

1.8.5 General Plan Amendment/Zone Change

Projects requiring a General Plan Amendment or zone change require review by the Planning Commission and approval by the City Council, regardless of proposed use. However, the City typically

reduces the timeframe for this legislative step by processing, where feasible, the discretionary permits at the same time. Alternatively, the City provides a process for a variance, which may reduce any unnecessary hardships related to requests to deviate from current zoning requirements. Approval to grant a variance is determined by the Community Development Director. A variance may be granted based on the following findings:

1. That strict or literal interpretation and enforcement of the specified regulation would result in practical difficulty or unnecessary hardship not otherwise shared by others within the surrounding area or vicinity;
2. That there are exceptional or extraordinary circumstances or conditions applicable to the property involved or to the intended use of the property which do not apply generally to other properties in the vicinity and under the same zoning classification;
3. That the strict interpretation and enforcement of the specified regulation would deprive the applicant of privileges enjoyed by the owners of other properties in the vicinity and under the same zoning classification;
4. That the granting of the variance will not constitute a grant of special privilege inconsistent with the limitations on other properties in the vicinity and under the same zoning classification;
5. That the granting of the variance will not be detrimental to the public health, safety or welfare, or materially injurious to properties or improvements in the vicinity; and
6. That the granting of the variance is consistent with the objectives and policies of the general plan and the intent of this title.

In approving a variance, reasonable conditions of approval may be imposed. The following conditions of approval for a variance may include, but shall not be limited to:

1. Requirements for open spaces, fences, walls, and screening buffers; requirements for landscaping and erosion control measures, including maintenance thereof;
2. Requirements for dedications and street improvements;
3. Regulation of vehicular ingress and egress and traffic circulation; and
4. Regulation of hours of operation, and such other conditions deemed necessary to ensure compatibility with surrounding uses, to preserve the public health, safety, and welfare, and to enable the reviewing authority to make all the findings required above.

The City's variance process is not found to be a constraint, and instead provides for equity in use of property and can prevent unnecessary hardships that might result from a strict or literal interpretation and enforcement of certain zoning regulations.

1.8.6 Processing Time

Developmental review is the primary way to ensure that new residential projects reflect the community's goals and contribute to improving local quality of life. The time it takes to obtain permits from the City can affect overall project cost, and therefore impact the cost of housing and the success of development in the community.

Highland values the time and money of its development applicants. The City reduced its processing times through enforcement of the "Come Home to Highland" program, which commits the City to establishing fixed fees for several forms of review, and ensures that a discretionary permit application is

brought to the appropriate review body within 90 days of the application completeness determination. **Table 6** shows the average processing times for various project applications and reviews.

Table 6. Permit Processing Times

Type of Application	Timeframe (days)
Zone Change	90
Tentative Tract or Parcel Map	90
Conditional Use Permit	90
Variance Review	45
Lot Line Adjustment	60
Staff Review (Design/Use)	5–10
Minor Design Review	45
Major Design Review	60–90

1.8.7 Special Business License Provisions: Crime Free Multiple Family Rental Housing Program

Prior to obtaining a valid City business license, the owners or operators of any property that contains four or more rental units (or rental spaces) that are being rented out for residential dwelling purposes must comply with all of the following crime free multiple-family rental-housing program requirements:

- Complete a crime free multiple-family rental-housing program seminar to be provided by the Highland police department ("seminar"); and
- Include a crime free lease or rental agreement addendum ("addendum") or clause in the lease or rental agreement similar to the crime free lease or rental agreement addendum in any leases or rental agreements that are executed, modified or extended after the effective date of the ordinance codified in this chapter. The city clerk shall maintain a sample addendum form for use by businesses subject to the provisions of this chapter.

When a property that is subject to the provisions of this chapter is transferred to a new owner, the new owner or operator shall complete the seminar within three months after the transfer of the rental property, or as soon as the seminar is conducted, whichever time is later.

When a property that is subject to the provisions of this chapter changes operators, the new operator shall complete the seminar within three months after the transfer of operations, or as soon as the seminar is conducted, whichever time is later.

Any owner or operator of property with four or more units that are being rented out for residential purposes shall complete the seminar once every three years.

The crime free multiple-family rental-housing program is a crime prevention program designed to reduce crime, drugs, and gang activities on the subject rental properties. At the seminar, the program coordinator shall provide, at no cost, samples of the addendum and, if applicable, shall review any clauses within actual leases with the city attorney's office to determine if the clause is similar to the addendum provisions designed to make criminal activity a lease or rental agreement violation. The owner or operator shall have the authority under the clause or addendum to initiate an eviction proceeding as specified in California state law.

Commented [ED2]: Note to City:
HCD has more questions for the City about this program. Specifically:
- whether the program or ordinance is enforced against federally subsidized properties, or against housing that serves specific populations (e.g., people reentering from contact with the criminal legal system or housing serving people with mental health or developmental disabilities);
- whether the program or ordinance requires or encourages property owners to conduct a criminal background check; and
- what conduct is covered by the ordinance/policy, and what locations of alleged criminal activity the ordinance covers (e.g., on the premises or off premises)

Through **Program 2, Residential Rental Enhancement and Rehabilitation Program** the City will continue to provide health and safety hazard checks for landlords, ensuring that tenants are not subject to substandard housing and the City will also continue to provide landlord trainings to ensure property safety measures are taken. **Program 2** further enhances upon this existing program to incorporate fair housing training for landlords. This will expand upon the City's Crime-Free Multiple-Family Rental Housing Program, to ensure that this program is implemented through the lens of fair housing, providing fair housing services for residents and landlords.

1.9 Housing for Persons with Disabilities

Effective on January 1, 2002, SB 520 amended Housing Element law and Government Code Section 65008 to require localities to analyze the constraints on housing for persons with disabilities. The City's adopted building codes (including the 2019 California Building Code, California Existing Building Code, and California Residential Code [Title 24]) require that new residential construction comply with the Federal Americans with Disabilities Act (ADA). Highland has the authority to enforce state accessibility laws and regulations (California Code of Regulations Title 24) when evaluating new construction requests. ADA provisions include requirements for a minimum percentage of units in new development to be fully accessible to people with physical disabilities. Compliance with provisions of the Federal ADA is assessed and enforced by Highland's Building Official. **Program 17** of the Housing Element will provide resources for information on home retrofits and accessibility in ADUs to increase the supply of units available for people with disabilities.

1.9.1 Reasonable Accommodation

The City of Highland understands the importance of reducing barriers to provide adequate housing for persons with disabilities. Chapter 16.40 in the Land Use and Development Code provides a formal process for requesting reasonable accommodations for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act in the application of zoning laws and other land use regulations, policies, and procedures. A reasonable accommodation refers to actions that a city takes to modify land use and zoning regulations affecting housing for people with disabilities. A reasonable modification is typically a structural change made to existing premises so that a person with a disability can fully use the premises.

Requests for a reasonable accommodation are submitted on an application provided by the Community Development Department, or in the form of a letter. Requests are reviewed by the Director of Community Development and written determination is provided by the director of their designee within 45 days that either grant, grant with modifications, or deny a request for reasonable accommodation.

Written determinations to grant or deny a request for reasonable accommodations shall be based on the following findings:

a. Whether the housing, which is the subject of the request, will be used by an individual with disabilities under the Federal Fair Housing Act and the California Fair Employment and Housing Act.
b. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Federal Fair Housing Act and the California Fair Employment and Housing Act.
c. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the city.

d. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning.

e. Potential impact on surrounding uses.

f. Physical attributes of the property and structures.

~~a.~~g. Alternative reasonable accommodations which may provide an equivalent level of benefit.

In granting a request for reasonable accommodation, the reviewing authority may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings outlined above. A determination by the reviewing authority to grant or deny a request for reasonable accommodation may be appealed to the Planning Commission in compliance with Section 16.08.210, Appeals, the Land Use and Development Code.

These findings are not found to be a constraint and are necessary to ensure consistency with the City's General Plan and Zoning Ordinance. Through Program 17, Housing for Persons with Disabilities, of the housing Element, the City will continue to provide a process by which relief from land use, zoning, or building laws, rules, policies, practices, and/or procedures can be alleviated for those with disabilities, including persons with developmental disabilities. Furthermore, the City will promote this procedure by providing information on its website that is easily accessible.

The City Land Use and Development Code's handicapped parking requirements are established by, and intended to be identical to, the requirements established by the State of California. Residential projects providing handicapped spaces are required to locate the spaces as close to building entrances as possible and to follow Citywide regulations in terms of size, striping, and signage. Handicapped parking standards for residential uses are not different from parking standards for other uses.

1.9.2 Residential Care Facilities

Group homes, boarding houses, and residential care facilities are often a resource for persons with a disability in need of special care. Large residential care facilities serving seven or more persons, called "Board and Care Facilities" in the uses table, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS), and conditionally permitted in commercial zones (CG, NC, PC, VC). The City does not have any occupancy restrictions based on relatedness or family ties in any land uses or zoning designations. See additional use details in **Section 1.4.1, Residential Care Facility**.

Program 18, Residential Care Facilities, is proposed to amend the Zoning Code to permit residential care facilities serving six or fewer persons by right in all residential zones in accordance with the Welfare and Institutions Code Section 5116 and permit those serving seven or more in at least one zone without discretion.~~to define and specify that residential care facilities are allowed by right in residential zones consistent with State law for small group homes (six or fewer) and with a Use Permit for large facilities (seven or more).~~

1.9.3 Senior Housing and Facilities

Other forms of housing that may assist persons with a disability include senior independent living projects, residential care homes for older adults, congregate care, and convalescent care. Senior independent living projects are permitted with a Staff Review Permit in the A/EQ, R-1, VR, and EHV zones, and conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and the mixed use zone (MU). Congregate care, assisted living, and convalescent care homes are conditionally permitted in multifamily, mixed use, and commercial zones. Residential care facilities, which can include residential

care facilities for older adults per the City's definition, serving seven or more persons, are conditionally permitted in multifamily zones (R-2, R-2C, R-3, R-4, and HDS).

2 Market Constraints

This section identifies those non-governmental market factors and other financial factors that may affect the cost of new housing. Market constraints to the development of residential housing include the cost of land, the cost of construction, and financing. Changes in the financial markets, changes in construction material costs, and other factors all affect the feasibility of developing new housing in the City. This section discusses land costs, construction costs, and financing issues. Although these factors may create barriers to building housing, the City has less control over but can influence or help support the production of affordable housing. While the City was unable to identify additional factors subject to local control directly related to land, labor, or material costs and/or financing that would significantly reduce the cost for housing, the City will continue to implement the Inclusionary Housing Ordinance through implementation of **Program 4, Inclusionary Housing**, of the Housing Element, and will identify affordable housing preservation, rehabilitation, and construction opportunities for the expenditure of acquired funds, especially for funding opportunities of housing for extremely low-income households and households with special needs. In addition, the City recognizes that land use incentives, such as the State Density Bonus law zoning designations that offer higher allowable densities, and lot consolidation incentives, can aid in reducing development costs and support the production of affordable housing. See **Section 4, Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing**, for further analysis related to policies and programs set forth in the 6th Cycle Housing Element that aim to incentive development and address potential non-governmental constraints.

Furthermore, the City is committed to continue participating in and promoting regional and State programs that address non-governmental market constraints by providing a range of financing options for low- and moderate-income homebuyers and owners. **Program 13, Homeowner Assistance Programs**, of the Housing Element commits the City to promoting the County homeowner assistance programs and resources on the City's website, and through **Program 1, Homeowner Rehabilitation Program**, the City will promote the homeowner rehabilitation repair loan opportunities offered through the Neighborhood Partnership Housing Services and strive to improve coordination with the County to identify opportunities for increased funding for homeowner rehabilitation.

2.1 Availability of Financing

2.1.1 Construction Financing

Construction financing costs affect the feasibility of building new housing. During the housing boom of the late 1980s, it was not uncommon for developers to receive construction loans for 100% or more of a project's estimated future value. Following the housing market downturn of the early 1990s, however, financial institutions tightened regulations for construction loans, often requiring developers to put up at least 25 percent of the project value. These trends continue today, meaning that developers must usually supply at least 25 percent of the project value upfront, and perhaps more if the total cost is more than 75 percent of the estimated value of the project.

Although there is no hard threshold for how much required upfront equity is too much before a residential project would be infeasible, the higher the proportion of equity required, the more unlikely that a developer would proceed with the project. Not only would it require more up-front cash, but higher equity contribution means a project must be able to achieve an even higher value at completion in order to generate the cash flow needed to meet acceptable cash-on-cash returns. These trends are anticipated to continue during the planning period.

2.1.2 Mortgage Financing

Although recent economic conditions have seen housing prices increase and interest rates remain low, buying a house or refinancing a mortgage is getting tougher, as banks raise requirements such as minimum credit score. Loan applicants with short credit history, lower incomes, self-employment incomes, or other unusual circumstances have had trouble qualifying for loans or are charged higher rates. This economic barrier could disproportionately affect lower-income, non-White borrowers, making it harder for them to close on a loan, especially as a result of the Corona virus pandemic and resulting economic fallout. The economic fallout has resulted in the unemployment rate increase in the City from 3.8 percent in 2019 to 8 percent as of November 2020, making it more difficult for unemployed, underemployed, lower-income borrowers, and other groups who historically have found it the most difficult to get a loan to get a fair loan.

The Home Mortgage Disclosure Act requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. This requirement applies to all loan applications for home purchase, improvements, and refinancing, whether financed at market rate or with government assistance. These data help show whether lenders are serving the housing needs of their communities, they give public officials information that helps them make decisions and policies, and they shed light on lending patterns that could be discriminatory.

Table 7 summarizes the disposition of loan applications submitted to financial institutions in 2019 for home purchase, refinance, and home improvement loans in Highland. The loan outcome information in the table includes the proportion of applications that were approved, were denied, or were incomplete or withdrawn by the applicant.

Table 7. Disposition of Home Loans (2019)

Loan Type	Total Applicants	Percent Approved[1]	Percent Denied	Percent Other[2]
Government-Backed Purchase	426	74.9%	8.5%	16.7%
Conventional Purchase	661	73.4%	7.3%	19.4%
Refinance	1,845	58%	16%	25.9%
Home Improvement	182	35.2%	51.1%	13.7%
Total	3,114	62.3%	15.2%	22.5%

Source: 2019 Home Mortgage Disclosure Act Lending Activity MSA/MD by Census Tract Data
[1] Approved includes loans approved by the lenders whether or not accepted by the applicant.
[2] Other includes loan applications that were either withdrawn or closed for incompleteness.

2.1.2.1 Home Purchase Loans

In 2019, a total of 426 households applied for government-backed loans (Federal Housing Administration, Farm Service Agency/Rural Housing Service, and Department of Veterans Affairs) in Highland. Of those applications, 75 percent were approved, and 8 percent were denied. More households applied for conventional loans to purchase homes in Highland, with a total of 661 applications. A total of 73 percent of the conventional loan applications were approved, and 7 percent were denied.

2.1.2.2 Refinance Loans

The highest number of applications received were for refinance loans, likely because many homeowners are looking to swap out their old mortgages for new loans at record-low rates. A total of 1,845 households in Highland applied for a home refinance loan in 2019. Of those applications, only 58 percent were approved, 16 percent were denied, and 26 percent were either withdrawn or closed for incompleteness.

2.1.2.3 Home Improvement Loans

In 2019, a total of 182 household applied for home improvement loans in Highland. This is the lowest number of applications, but had the highest percentage of applications denied. Of the total applications, 51 percent of home improvement loans were denied by lending institutions and 35 percent were approved. One of the most important factors that lenders evaluate when reviewing an application is the applicant's debt-to-income ratio, which indicates how much income the monthly debt takes up. Most home improvement loans applicants may have high debt-to-income ratios from their mortgage loan, which may explain why it is harder to qualify for the additional financing.

2.2 Construction Costs and Construction Labor Shortage

Residential construction continues to face limiting factors, including concerns over regulatory cost burdens, an ongoing labor skills shortage, and higher costs and longer delivery times for building materials. Factors that affect the cost of building a house include the type of construction, materials, site conditions, finishing details, amenities, structural configuration, and project characteristics, such as the type and quality of the unit.

On average, 60 percent of the final cost of a single-family home is attributed to construction costs. According to the U.S. Census Bureau's Annual Characteristics of New Housing Survey, the average contract price per square foot of new contractor-built single-family houses averages approximately $158 per square foot.

One indicator of construction costs is building valuation data compiled by the International Code Council. The unit costs compiled by the International Code Council include foundation work, structural and nonstructural building components, electrical, plumbing, mechanical, and interior finish material. The data is a national average and does not take into account any regional cost differences, nor include the price of the land upon which the building is built. According to the latest building valuation data release in 2019, the national average for development costs per square foot for apartments and single-family homes in 2019 were as follows:

- Type I or II, R-2 Residential Multifamily: $148.82 to $168.94 per square foot
- Type V Wood Frame, R-2 Residential Multifamily: $113.88 to $118.57 per square foot
- Type V Wood Frame, R-3 Residential One- and Two-Family Dwelling: $123.68 to $131.34 per square foot
- R-4 Residential Care/Assisted Living Facilities generally range from $143.75 to $199.81 per square foot

In general, construction costs can be lowered by increasing the number of units in a development, until the scale of the project requires a different construction type that commands a higher per-square-foot cost. Apartments of three stories or fewer achieve an economy of scale, provided that the building has typical amenities and no structured parking. Mobile homes are significantly less expensive, as are precision or factory-built housing products.

Labor costs also greatly contribute to construction costs. They are generally two to three times the cost of construction materials. A 2019 study for Smart Cities Prevail found that California lost about 200,000 construction workers since 2006. Many lost their job during the recession and found work in other industries. Pre-pandemic, the industry already faced this historic shortage of skilled labor, and the labor gaps might get even larger, especially in states like California.

2.3 Land Costs

The cost of raw, developable land creates a direct impact on the cost for a new home and is considered a possible constraint. Land costs, when compared with projected rents and sales prices of housing, affect the feasibility of construction. A higher cost of land raises the price of a new home, which typically makes the cost of land a major factor in determining the cost of developing housing. Land costs are influenced by many variables, including supply, demand, location, site constraints, and the availability of public utilities and other infrastructure. Based on available land for sale as of January 2021, the average cost of undeveloped land in Highland is approximately $167,000 per acre for single-family zoned developable parcels and $440,000 per acre of multifamily zoned developable parcels.

In addition to the basic cost of land, the holding cost is also a consideration in the price of housing. Holding costs vary depending on interest rates for acquisition and development loans. Interest rates are beyond the control of local jurisdictions. However, land holding costs can be lessened by reducing processing times for building permits in most jurisdictions. Therefore, developers sometimes seek to obtain approvals for the largest number of lots allowable on a parcel of land.

2.4 Requests for Housing Developments at Reduced Densities

State law requires the Housing Element to include an analysis of requests to develop housing at densities below those anticipated in the sites inventory. The realistic capacity for sites identified as appropriate to accommodate lower-income units in the sites inventory were calculated based on minimum densities permitted and can therefore be reasonably anticipated to be developed at densities above those anticipated in the sites inventory. However, after considering topographical constraints and addressing potential environmental mitigation requirements, the City's development review team proactively and upon request evaluates potential parking and/or landscape coverage reductions to help increase density. When appropriate, Planned Development documents and Specific Plans are also promoted as a means of increasing density with the benefit of increasing amenities, such as park and recreation facilities. In addition, the viability of a Density Bonus application is also considered as a means to increase the density of potential projects in the City.

As identified in **Program 25, No Net Loss**, the City will monitor development activity compared to remaining capacity identified in the Sites Inventory and the City's remaining Regional Housing Needs Allocation (RHNA) throughout the 6th Cycle to ensure there are adequate sites to accommodate the RHNA.

2.5 Length of Time between Project Approval and Applications for Building Permits

State law requires an analysis of the length of time between receiving approval for housing development and submittal of an application for building permit. On average, the time is between 45 to 90 days for the approval for a housing development entitlement of 4 or more units, after submittal of a

completed application and plans for building permits which comply with all applicable regulations it takes approximately 1 ½ months to obtain a building permit. On average, the time is between 5 to 10 days for the design review approval of smaller in-fill projects of 3 or less units, and after the submittal of a completed application and plans for building permits it takes approximately 1 month to obtain a building permit.

3 Environmental Constraints

Environmental constraints can limit or affect the type of housing and density of housing development in a community. These constraints can include natural resources, hazards, or lack of sufficient infrastructure capacity. However, Highland is an urbanized community with the majority of the City's infrastructure already in place. Environmental and infrastructure constraints do not pose a significant constraint to housing production.

3.1 Environmental Features

3.1.1 Biological Resources

Due to urbanization and growth, habitat is limited to the undisturbed areas of the northeast. Native habitats within the developed part of the City are few and include annual grasslands with nonnative grasses, disturbed areas with spare amounts of native species, and landscaped areas. There are plant and wildlife communities within the City, many associated with the watercourses that traverse the City and drainage in the canyons of the foothills and mountains. The City is located north of the Upper Santa Ana River Wash Habitat Conservation Plan; however, the City itself is not within a Habitat Conservation Plan area or other plan area protecting biological resources. Biological resources are regulated and protected by Federal (U.S. Fish and Wildlife Service) and State (California Department of Fish and Wildlife) regulations, and the County of San Bernardino. Federal and State regulations require environmental review of proposed discretionary projects. Costs, resulting from fees charged by local governments and private consultants needed to complete the environmental analyses, and from delays caused by mandated public review periods, also add to the cost of housing. However, the presence of such regulations is required to preserve the environmental and ensure environmental quality for Highland residents.

3.1.2 Archaeological Resources

There are several sites north of the City and specific areas that have been designated as archaeologically sensitive areas with a high probability for discovery of archeological resources if disturbed by development. One of the Native American tribes closely associated with the City of Highland is the San Manuel Band of Mission Indians. To preserve archaeological resources and the history of the San Manuel Band of Mission Indians, the City's approach to preservation is through a site-by-site analysis using the development review process. Such analysis is required by State law through CEQA and involves archival research, field reconnaissance/survey, and preparation of a Cultural Resources Report. If resources are identified within areas of proposed housing developments, the individual project applicant would work with the City and a qualified archaeologist to determine the proper mitigation for the site in question. As with biological resources, such analysis would add to the cost of housing; however, it is required to avoid significant impacts to archaeologically sensitive sites.

3.1.3 Water Resources

Water is provided to Highland by the EVWD through groundwater, surface water, and imported water. Water providers in Southern California face the challenge of growing demand and uncertainty of supply. The Urban Water Management Plan Act requires water providers to evaluate supplies during normal year, single dry year, and multiple dry year scenarios; existing baseline water use; targets for future water use; demand management measures implemented or planned for implementation; water shortage contingency planning; and notification with other water agencies. It is estimated that the EVWD would experience a 7 percent increase in demand from 2020 to 2030. Assuming conservation

behaviors continue among the population, and the EVWD continues to identify new, cost-effective ways to supply water, Highland should be able to supply the water needed for the City's anticipated growth.

3.1.4 Energy Conservation

Rising energy costs, dependence on fossil fuels, and increasing evidence of the adverse impacts of climate change have provoked the need in California and nationwide to improve energy management strategies. Although California has always been a leader in energy conservation, recent regulations specifically target energy independence and greenhouse gas emissions. In 2006, the State Legislature adopted the Global Warming Solutions Act of 2006, which created the first comprehensive, State regulatory program to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050. Promoting energy conservation has become a consistent theme in California's regulations.

Highland understands that energy efficiency can greatly reduce the impact of residential development and provide cost savings for its residents. On a regulatory level, the City enforces the State Energy Conservation Standards (California Code of Regulations Title 24). These standards incorporated into the City's Building Code provide a great deal of flexibility for individual builders to achieve a minimum "energy budget" with various performance standards. These requirements apply to all new residential and commercial construction and to remodeling and rehabilitation construction only where square footage is added. Compliance with Title 24 of the California Administrative Code on the use of energy-efficient appliances and insulation has reduced energy demand stemming from new residential development.

Residential development in Highland is evaluated for energy efficiency during the plan review process. Every residential project must submit calculations per model showing compliance with Title 24. The applicant must describe the type of heating system and maximum capacity, and provide the make, size, and model number for all air conditioning units, furnaces, and water heating equipment. More energy efficiency could be encouraged through an incentives program.

The City of Highland educates the development community and residents through informative materials made available in public buildings, the City's website, and the General Plan Open Space and Conservation Element. Part of this effort is promoting energy efficiency in existing structures through rehabilitation and appliance replacement, and in new development through incentive programs provided by utility companies. The City also has policies that encourage energy conservation and housing objectives. For example, infill development discussed in the Housing Element and Land Use Element encourages housing development opportunities without creating sprawl. The 2014–2021 Housing Element updated the Land Use and Development Code to include the Residential HDS Overlay, permitting such multifamily units by-right. Additionally, multifamily housing types within the R-4 zone is permitted by-right. The HDS and R-4 zoning are located within urbanized portions of the City. These development types are consistent with State goals to encourage compact, walkable, and energy-efficient neighborhoods.

3.2 Environmental Hazards

Environmental hazards affecting housing development and resident safety include extreme heat, flooding, geologic hazards (landslides/slope instability, earthquakes, and liquefaction), and wildfires. These hazards provide the greatest threat to the built environment. Development should be carefully controlled in potentially hazardous areas. The City of Highland Safety Element, which provides policy guidance about environmental constraints, was updated in 2021 and covers all of the areas within the land inventory.

3.2.1 Flooding

Flood risk is dispersed across Highland but is most centralized in the southern portion of East Highland just south of Greenspot Road and along City Creek. This area has a 1 percent chance of flooding annually, which is also known as a 100-year flood zone. Much of the area south of Greenspot Road and along City Creek is zoned as Open Space and Agricultural/Equestrian. This aids in allowing for natural drainage during extreme rain events. Highland has adopted special standards, such as minimum building elevations, flood proofing, and anchoring, for development in flood-prone areas. Any housing sites identified in the Housing Element that may be located in a 100- or 500-year floodplain, or other flood hazard zone, will be developed in accordance with strict regulations to properly mitigate flooding hazards in accordance with the floodplain management standards of the Highland Municipal Code (Chapter 16.76).

3.2.2 Landslides/Slope Instability

Steep slopes can experience landslides, debris flows, mudslides, and erosion. These effects impact where development can occur throughout the City and can result in damages to existing development. Areas at high risk of landslides include the northern and eastern areas due to their proximity to steep slopes and the rock strength in these areas. The City has regulations in place to reduce the potential for slope failure, erosion, and mudslides when new development is proposed in areas subject to geological risks.

3.2.3 Earthquake

Like the entire Southern California region, the City of Highland is within an area of high seismic activity. It can be expected, therefore, that a significant seismic event will occur in the City. The timing and magnitude of such an event cannot be predicted, although planning efforts for emergency response must be predicated on the certainty of such an event. North and south branches of the San Andreas Fault, a known active fault, run through Highland. The San Jacinto Fault is approximately 4.5 miles southwest of the City. The City's Safety Element requires residential development to be set back a minimum of 50 feet from active and potentially active fault lines. The Safety Element includes other policies to increase mitigation measures and further study possible geologic- and seismic-related hazards.

3.2.4 Liquefaction

Liquefaction may damage structures on saturated, granular soils, such as silt or sand, during an earthquake. These geologic conditions are typical in valley regions within Highland. Areas at risk of liquefaction due to soil composition and heightened exposure to runoff cover nearly all of southeastern Highland, as well as western Highland. Detailed soils engineering investigations would be necessary in those areas where future development is proposed within liquefaction areas in order to further evaluate the liquefaction potential, and to further define the potentially affected areas of the City. However, because of the site-specific nature of geologic hazards, existing geologic conditions are not expected to adversely impact development within Highland. In addition to existing building codes and regulations, site-specific geologic reports would recommend any necessary mitigation measures, if required, to reduce potential hazards associated with liquefaction.

3.2.5 Wildfire

The City of Highland's building codes require new housing to include fire sprinkler systems to protect residents and property. Wildland fires are a present threat, as there are large expanses of undeveloped

hillsides in and adjacent to Highland. Most of the City of Highland is built in fire-risk areas due to the proximity to forestland to the north and east of City limits. The most northeastern portions of Highland are located in very high fire risk areas, while much of the central and southern portions of Highland are high fire risk areas. Precautions, such as fuel modification zones and vegetation maintenance, help protect Highland's natural and developed areas from wildfire. The California Department of Forestry and Fire Protection provides fire prevention and suppression services to the City and unincorporated areas east of the City. Additional wildland fire protection services are provided by the U.S. Forest Service on National Forest lands adjacent to the City.

3.3 Adequate Infrastructure Capacity

The City of Highland contains both developed and largely undeveloped residentially zoned areas. In developed areas, the existing infrastructure system is sufficient to support Highland's population, but water and sewer are limited in undeveloped areas within the City. However, infrastructure in currently unserved areas will be planned and constructed as necessary to serve new development. These improvements are typically dedicated to the City, which is then responsible for maintenance and/or improvement.

Future housing growth is focused in commercial areas around existing bus stops that are served by existing sewer and water lines. All development plans in Highland must be coordinated with the EVWD to meet wastewater disposal and treatment requirements established by the California Department of Health Services. Development impact fees will allow the water and wastewater districts to provide necessary connections and services.

3.3.1 Dry Utilities

The California Public Utilities Commission is responsible for regulating the electric, natural gas and telecommunication industries excepting cable television. Southern California Edison provides electricity to the City. Southern California Edison has a local office in the City of Redlands and operates a substation in the City. Electrical facilities are expected to keep pace with anticipated demand in the City. The Southern California Gas Company provides natural gas to the City. The Southern California Gas Company has local offices in the City of San Bernardino and the City of Redlands. The availability of natural gas is based on current conditions of gas supply and regulatory policies. The Southern California Gas Company has no current plans for significant improvement or expansion plans for the City and anticipates that an ample supply of natural gas can be provided to the City. Important telecommunication systems are available to the City's residents, including cable, high-speed Internet, and wireless communication. Refer to the City's Public Services and Facilities Element of the General Plan for additional information.

There is sufficient existing or planned dry utilities supply capacity, including electricity, natural gas, cable, and telephone, to accommodate the City's regional housing need and sites identified for the planning period (see **Appendix E** for Sites Inventory details).

3.3.2 Sewer System

The EVWD provides sewer services to the City and has a joint powers agreement with the City of San Bernardino to accept all sewage generated by the City. Although the sewer system is adequate for existing development in Highland, continued growth has the potential to impact the capabilities of the sewer system. Developers must coordinate with the EVWD to meet sewer requirements. The EVWD has adopted the 2019 Sewer System Management Plan. As required by Order No. 2006-0003, Statewide

General Waste Discharge Requirements, the Sewer System Management Plan will undergo review and revisions through internal audits every 2 years. The Statewide General Waste Discharge Requirements also require an agency to have a System Evaluation and Capacity Assurance Plan. This component involves preparing and implementing a Capital Improvement Program that will provide the hydraulic capacity of key sewer systems for dry-weather peak-flow conditions, as well as appropriate design storm or wet-weather events. The 2019 Sewer Master Plan identifies projects in prioritized order for pipelines showing capacity deficiency in the future planning horizon. After completing the projects identified in the 2019 Sewer Master Plan, the City's sewer system will operate with adequate capacity.

The sewage from the City flows in a general direction from northeast to southwest toward the San Bernardino Water Reclamation Plant located at 299 Blood Bank Road in the City of San Bernardino. This plant is operated by the San Bernardino City Municipal Water Department, Water Reclamation Division. The plant processes an average sewage flow of approximately 26 to 27 million gallons per day (mgd) from the City of San Bernardino, the City, and other areas. The plant has a total sewage capacity of 33 mgd. Expansion or construction of a new wastewater treatment facility to meet the demands of the 2021–2029 Housing Element update is not required.

3.3.3 Water System

The City's water supply sources are local groundwater, surface runoff from natural watershed and drainage areas, and imported water. The EVWD manages the water supply through a system of pipelines, wells, reservoirs, pumping stations, and a treatment plant. This system includes approximately 19 active wells, 2 inactive wells, 18 reservoirs, and 26 booster stations all located on 39 different plant sites.

The water distribution and transmission network varies considerably throughout the City. Transmission lines (16 to 24 inches in diameter) transport large quantities of water from one area to another. Major transmission lines are located in parts of Victoria Avenue, Sterling Avenue, Del Rosa Drive, Tippecanoe Avenue, Church Street, Weaver Street, 9th Street, Base Line, Pacific Street, Highland Avenue, and 5th Street. Distribution lines (3/4 inches to 20 inches in diameter) deliver water to individual dwelling units. Major streets have the larger distribution lines whereas secondary or local streets have progressively smaller lines.

The 2019 Water System Master Plan provides guidance for the expansion of the current water system based on planned development. Potential infill growth resulting from new zoning and land use regulations would be accounted for in future Water System Master Plan updates. Additionally, the 2019 Water System Master Plan evaluates the existing distribution system and its facilities to size future improvements. A water supply analysis was performed to determine whether available water sources are sufficient to meet water demand for the EVWD under normal and emergency operations. It was determined that EVWD will have a total deficiency of approximately 18.0 mgd of storage capacity and 13.44 mgd for supply under the build-out demand. Improvement projects identified would address system deficiencies and increased water demands.

4 Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing

During the 5th Cycle Housing Element planning period, the City made strides to reduce constraints to development that are within the City's purview since the Housing Element was last updated in 2013. Reductions to constraints during the 5th Cycle planning period were as follows:

- Updates to the Land Use and Development Code to comply with State law regarding transitional and supportive housing.
- The Greenspot Village & Marketplace Specific Plan adoption in 2013, providing a generous amount of land available for residential development, including up to 800 residential units, and a mix of residential, commercial, entertainment, governmental, and professional office uses.
- Amended the Land Use and Development Code to make permitting ADUs in single-family zones a ministerial action that does not require public notice, public hearing, or discretionary approval.

During the 6th Cycle review of governmental and non-governmental constraints, the following areas were identified as imposing potential constraints to housing development, including housing affordable to lower-income households and for special needs groups including persons with disabilities.

Updates to State Law

Most recently, the City amended the Accessory Dwelling Units and Junior Accessory Dwelling Units Ordinance (Section 16.44.180 of the City's Land Use and Development Code) in 2021 to comply with several updates consistent with State law, Government Code Section 65852.2. As part of **Program 12, Accessory Dwelling Units**, of the Housing Element, the City will submit the updated ordinance to HCD for their review and will incorporate amendments, as required by HCD. Further, the City will develop and adopt a program that incentivizes and promotes the creation of ADUs that can be offered at an affordable rent for extremely low, very low, low, or moderate-income households or households with special needs (AB 671, 2019). Other areas in the Land Use and Development Code which may pose a constraint to development as they are not up to date with current State law include, Emergency shelter parking requirements, by-right approvals for Low-barrier Navigation Centers, and density bonus requirements for affordable housing. However, through **Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing**, the City will permit transitional and supportive housing consistent with State laws and amend the City's Emergency Shelters Ordinance (Section 16.44.270, Emergency Shelters) to comply with parking requirements set forth by AB 139, Quirk-Silva. Through **Program 28, Low Barrier Navigation Centers**, the City will update the Land Use and Development Code to provide, by-right, approvals exempt per the California Environmental Quality Act (CEQA) to Low-Barrier Navigation Centers meeting specific standards in areas zoned for mixed uses and nonresidential zones permitting multifamily uses, consistent with AB 101's requirements for Low-Barrier Navigation Centers. As mentioned, the City's Density Bonus Ordinance, approved in 2013, is no longer in compliance with the State's latest Density Bonus Law. **Program 6, Density Bonus**, will update the City's Density Bonus Ordinance to comply with the current State Density Bonus Law, including the provision for an increased bonus for 100 percent affordable developments and student affordable housing.

Residential Care Facilities

Another potential governmental constraint identified is related to the development of residential care facilities. While the City's Land Use and Development Code includes a definition and permit requirements for residential care facilities serving seven or more persons, called "Board and Care facilities" it does not differentiate or include provisions for residential care facilities for 6 persons or fewer. This is a constraint to the development of residential care facilities for 6 or fewer persons as local agencies must permit these facilities as follows: (1) the same as any other residential use and shall be considered a residential use of property by a single family; (2) allowed in all residential zones; and (3) be subject to the same development standards, fees, taxes, and permit procedures as those imposed on the same type of housing in the same zone.

Another potential constraint is the development of residential care facilities for seven persons or more. According to the permitted uses table in the Land Use and Development Code (see Table 2), a residential care facility for seven persons or more (Board and Care Facilities) are conditionally permitted in all multifamily zones (R-2, R-2C, R-3, R-4, and HDS) and commercial zones (CG, NC, PC, VC). Requirements for discretionary permits may be necessary for certain uses which could have an effect on the existing community; however, they may also pose constraints to development. As such, **Program 18**, Residential Care Facilities, of the Housing Element includes an objective to amend the Zoning Code to permit residential care facilities serving six or fewer persons by right in all residential zones in accordance with the Welfare and Institutions Code Section 5116 and permit those serving seven or more in at least one zone without discretion.

Lot Consolidation

The City has identified numerous vacant and underutilized parcels that have the potential to accommodate multifamily projects, as detailed in **Appendix E.** To mitigate potential constraints that may exist related to lot consolidation for development projects relying on multiple lots to create one site, the City will provide a permit expedite incentive for lot consolidation for multifamily development on sites identified in the Housing Element as having the potential to accommodate lower- or moderate-income units, including those sites with potential for extremely low-income development and development to meet the needs of those with special needs, through implementation of **Program 23, Lot Consolidation Invective,** of the Housing Element.

Single Room Occupancies (SROs)

Another potential governmental constrain is related to the development of SRO units which impact extremely low-income households. The Land Use and Development Code does not currently permit SRO units. As such, through **Program 19** of the Housing Element, the City is committing to amend the Zoning Code to identify a process by which SRO units can be permitted to further increase housing opportunities for extremely low-income households.

Market Constraints

Non-governmental constraints are generally market driven and outside the control of local government; nonetheless, the City can take action to help alleviate some of these constraints in the form of regulatory relief and increased certainty in the development process. For example, **Programs 21, Affordable Housing Partnerships,** and **Program 25, No Net Loss,** are related to market demand and promoting developer interest to build affordable housing. **Through Program 21, Mobile Home Preservation,** the City will require a report detailing relocation and displacement for any proposed conversion or closure of a mobile home park. This ensures that residents of mobile homes, which are typically lower-income households,

are not displaced from the City and that housing stock for lower-income households remains in the City. Through **Program 25, No Net Loss**, the City will monitor development activity compared to remaining capacity identified in the Sites Inventory and the City's RHNA to ensure there is adequate capacity for lower-income households. Similarly, through **Program 1, Homeowner Rehabilitation Program**, the City will partner with the County to refer residents to a loan available to eligible households earning below 80 percent of the Area Median Income in the Inland Valley which provides up to $25,000 per households to be used for financing home improvements, including health and safety repairs and energy efficiency upgrades. This helps ensure the longevity of the City's housing stock.

Other programs in the Housing Element aimed to incentive development and address potential non-governmental constraints include:

- **Program 4, Inclusionary Housing**, which requires that all new housing developments provide affordable units on site or off site, or to pay an in-lieu fee that goes into the City's affordable housing preservation and construction fund.
- **Program 8, By-Right Development On Previously Identified Housing Sites**, will permit sites in the Sites Inventory, that were previously identified in accordance with the specifications of Housing Element law, to be developed by right where 20 percent of the total housing units in the development will be affordable to lower-income households consistent with State Assembly Bill (AB) 1397 (See Section 3.3, Sites Identified in Previous Housing Elements, of Appendix E, for additional details).
- **Program 20, Affordable Housing Partnerships**, the City will support creative models of affordable property ownership and affordable housing preservation through methods such as community land trusts.
- **Program 22, Collaborative Partnerships**, the City will contact local affordable housing service providers to discuss partnering and will continue to seek financial assistance from other agencies.
- **Program 31, Surplus Lands**, the City will identify and prioritize local surplus lands available for housing development affordable to lower-income households, including extremely low-income households and households with special needs.
- **Program 31, Increased Transparency**, the City will maintain information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports to ensure the development process is clear.

Further details can be found in the Housing Element, Program Implementation subsection.

5 Quantified Objectives

Based on the City's needs, resources, constraints, and programs outlined in the Housing Element, **Table 8, Summary of Quantified Objectives for 6th Cycle (2021-2029)** summarizes the quantifiable objectives for the 6th Cycle. The quantified objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period. The quantified objectives do not represent a ceiling on development, but rather set a target goal for the City to achieve.

Table 8. Summary of Quantified Objectives for 6th Cycle (2021-2029)

Income Category	6th Cycle RHNA	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low	309	#	#	0
Very Low	310	#	#	0
Low	409	#	#	0
Moderate	471	#	#	0
Above Moderate	1,014	1,014	0	0
TOTALS	**2,513**	#	#	**0**

Commented [EVS3]: Note to City:
Please fill in the number of units that you estimate will be rehabilitated during the 6th Cycle. Estimates can be based on the number of units that were rehabilitated in the City during the 5th Cycle through County programs or other funding sources.

No units have been noted for conservation/preservation as there are no at-risk units in the City. As such, the remaining RHNA (6th Cycle RHNA – Rehabilitation) is expected to come from new construction.

Appendix D: Affirmatively Furthering Fair Housing Analysis

Contents

1. Introduction 3
2. Analysis of Impediments to Fair Housing Choice 4
3. Housing Element Outreach 4
4. Assessment of Fair Housing 5
   - 4.1. Fair Housing Enforcement and Outreach Capacity 5
   - 4.2. Segregation and Integration 7
     - 4.2.1. Race and Ethnicity 7
     - 4.2.2. National-Origin 13
     - 4.2.3. Language 13
     - 4.2.4. Household Income 13
     - 4.2.5. Familial Status 21
     - 4.2.6. Persons with Disabilities 30
     - 4.2.7. Neighborhood Segregation 30
   - 4.3. Racially and Ethnically Concentrated Areas of Poverty 35
     - 4.3.1. Racial Concentrations in Areas of Affluence 38
   - 4.4. Patterns Over Time 38
     - 4.4.1. Mortgage Loan Access 39
     - 4.4.2. Demographic Trends 40
   - 4.5. Disparities in Access to Opportunity 41
     - 4.5.1. Access to Education 45
     - 4.5.2. Access to Economic Opportunity 50
     - 4.5.3. Access to Transportation 55
     - 4.5.4. Access to a Healthy Environment 58
     - 4.5.5. Access to Opportunity for Persons with Disabilities 67
   - 4.6. Disproportionate Housing Needs and Displacement Risk 68
     - 4.6.1. Housing Affordability 69
     - 4.6.2. Housing Conditions 76
     - 4.6.3. Overcrowding 76
     - 4.6.4. Displacement 81
   - 4.7. Other Relevant Components 88
     - 4.7.1. Demographic Trends 88
     - 4.7.2. Public Assistance 88
5. Sites Inventory Analysis Consistency 91
   - 5.1. Improved and Exacerbated Conditions 91
     - 5.1.1. Segregation and Integration 93
     - 5.1.2. R/ECAPs 93
     - 5.1.3. Disparities in Access to Opportunity 94
     - 5.1.4. Disproportionate Housing Needs, Including Displacement Risk 94

6. Summary of Fair Housing Issues 94
7. Contributing Factors to Fair Housing Issues and Strategies for Affirmatively Furthering Fair Housing 95
7.1. Prioritization of Contributing Factors and Actions Designed to Meaningfully Address Contributing Factors 96

Figures

Figure 1A. Race and Ethnic Distribution 9
Figure 1B. Race and Ethnic Distribution in the Region 10
Figure 2A. Diversity Index 11
Figure 3A. Median Income 15
Figure 4A. Poverty Status 17
Figure 5A. Low to Moderate Income 19
Figure 6A. Children in Single-Mother Headed Households 22
Figure 7A. Children in Married Couple Households 24
Figure 8A. Adults Living Alone 26
Figure 10A. Population with a Disability 31
Figure 11A. Neighborhood Segregation 33
Figure 12A. R/ECAP and Segregation and Poverty 36
Figure 13A. Opportunity Map 43
Figure 14A. Opportunity for Education 48
Figure 15A. Economic Outcomes 51
Figure 16A. Jobs Proximity Index 53
Figure 17. Automobile Ownership Rates 56
Figure 18. Access to Transit 57
Figure 19A. Opportunity for a Healthy Environment 59
Figure 20A. CalEnviroScreen 3.0 61
Figure 21A. Healthy Places Index 64
Figure 22. Parks 66
Figure 23A. Percent of Renter-Occupied Housing Units 70
Figure 23B. Percent of Renter-Occupied Housing Units in the Region 71
Figure 24A. Renter Cost Burden 72
Figure 25A. Homeowner Cost Burden 74
Figure 26A. Any Four Severe Housing Problems 77
Figure 27A. Overcrowding 79
Figure 28A. Communities Sensitive to Displacement 82
Figure 29. Fire Hazards 85
Figure 30. Flood Hazards 86
Figure 31. Seismic Hazards 87
Figure 32A. Housing Choice Vouchers 89
Figure 33. Sites Inventory Map 92

1. Introduction

Fair housing occurs when individuals of similar income levels have the same range of housing choice available to them in the same housing market regardless of their characteristics as protected under local, State, and Federal laws. It is important to the City of Highland (City) that its citizens have fair housing choice, free from discrimination on the basis of race/ethnicity, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act, California Government Code Section 65008, and other State and Federal fair housing and planning laws. In 2018, Assembly Bill 686, Affirmatively Further Fair Housing, amended Sections 65583 and 65582.2 of the California Government Code to require a public agency to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing.

From freeway expansion to discriminatory housing loan practices, historically underserved communities across the nation have experienced decades of housing disinvestment and infrastructure underinvestment. Many racially and ethnically segregated communities have been left with higher rates of air pollution, poverty, unemployment, educational attainment, and health risks. State and Federal laws, such as the Fair Housing Act, have established pathways for local jurisdictions to create more diverse and equitable communities, but reversing decades of discriminatory policies at all levels of the public and private sectors is complex, and many challenges to equitable development remain. The Housing Element seeks to affirmatively further fair housing by identifying segregated living patterns and barriers to fair housing, designating sites for affordable housing in areas of opportunity, and implementing programs that aim to replace segregated living patterns and transform racially and ethnically concentrated areas of poverty. Siting lower-income housing in high-resource areas is only part of the solution to improve fair housing. Cities must also plan for the needs of lower-income individuals and households through methods such as accessibility of jobs, transportation, educational opportunities, and health services.

This section serves as an assessment of fair housing practices in the City pursuant to California Government Code Section 65583(c)(9). Housing Elements are required to include the following:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and outreach capacity
- An analysis of available Federal, State, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk
- An assessment of the factors that contribute to the fair housing issues identified in the analysis
- An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to the greatest contributing factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance
- Measurable strategies and actions to implement the fair housing priorities and goals in the form of programs to affirmatively further fair housing

2. Analysis of Impediments to Fair Housing Choice

The City intends to affirmatively further fair housing choice and promote equal housing opportunity in accordance with requirements in State Fair Housing and Housing Element law and Federal law. To achieve this, the City identifies impediments to fair housing choice and works to remove these impediments through this Affirmatively Furthering Fair Housing Analysis. In addition, in March 2015, the County of San Bernardino (County) adopted the County of San Bernardino Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments presents a demographic profile of the region, assesses the extent of housing needs among specific income groups, and evaluates the availability of a range of housing choices for residents. The Analysis of Impediments also analyzes the conditions in the private market and the public sector that could limit the range of housing choices or impede a person's access to housing.

3. Housing Element Outreach

While outreach and community engagement have always been important, in recent years significant strides have been made in technology and level of effort regarding engagement. Past engagement may not always have had multiple forms of media, meaning that in-person public meetings were the primary form of engagement, with surveys and stakeholder interviews and other types of engagement taking a back seat. In-person public meetings are not always the most accessible for multiple reasons. If a meeting is at only one specific time, or if it is only offered in English, it can create participation barriers for those who may be unable to attend at the specified time or location, or people without proficiency in English.

Engagement related to the Housing Element has attempted to be comprehensive while in the context of the COVID-19 pandemic. An online survey was used to engage residents on local housing needs and concerns. Stakeholder interviews were conducted via telephone, where public meeting participants were invited to share their thoughts in a one-on-one setting. Results of the interviews provided a better understanding of housing needs, priorities, opportunities, and constraints. All virtual meetings were held in English and Spanish to foster participation across demographics, as 34.7 percent of the population is Spanish-speaking. Virtual meetings were open to the public and were recorded and made available for public viewing after the event as well. Because the virtual meetings were conducted to allow participants to practice social distancing, participants had the option of joining through their computers or tablets, or using a call-in number if they did not have access to the internet. Virtual meetings were also streamed onto Facebook, which allowed for post-meeting comments to be submitted. In addition, the outreach was held in the evenings, outside of working hours. An extensive outreach process contributes to a set of meaningful goals, policies, and programs that will reflect the City's housing needs and the priorities and needs of all of those in the City, including those with special needs and lower-income populations.

Please refer to **Appendix F**, Community Engagement Summary and Results, for a full summary of outreach material and outreach conducted as part of the Housing Element update.

4. Assessment of Fair Housing

4.1. Fair Housing Enforcement and Outreach Capacity

This section discusses the fair housing services available to residents in the City ~~of Highland~~ and the corresponding organizations that provide fair housing services available to both providers and consumers of housing, as well as the nature and extent of fair housing complaints received by the fair housing provider. In general, fair housing services include investigating and resolving housing discrimination complaints; discrimination auditing and testing; and education and outreach, such as disseminating fair housing information through written materials, workshops, and seminars.

The City ~~of Highland~~ coordinates with the Inland Fair Housing and Mediation Board (IFHMB's) to provide fair housing services for its residents. ~~Fair housing~~ Services provided by IFHMB include ~~is~~ providing information as ~~it~~ relates to fair housing, investigation, education, conciliation, and/or referral of housing discrimination complaints free of charge to individuals. It also involves fair housing workshops that are offered year-round to educate housing providers, tenants, homeowners, and financial and lending institutions on the key aspects of fair housing laws.

According to the California Department of Employment and Fair Housing, between the calendar years of 2013 and 2021, there were a total of ~~three~~ 3 housing cases in Highland. One of these was filed based on discrimination to national origin. Of the 3 cases, 2 were documented as failure to respond and 1 was documented as no valid issue. None of the cases filed in the City were based on s~~S~~ex orientation, disability, race, familial status, religion, and color ~~had zero housing cases filed in the City~~. There are no known fair housing lawsuits in the City. Through this contract with the IFHMB, the City is able to effectively disseminate fair housing issues, provide resources and educational material through community outreach and other fair housing services provided to the residents of the City.

At the County level, there were 12 total cases in 2020. Of these 12 cases submitted to the Office of Fair Housing and Equal Opportunity (FHEO), 2 were for racial bias, 8 were for disability and 1 for familial status. Information regarding the validity of the cases or resolution count is not available.

Additional organizations that offer fair housing services and are available to the residents of the City include the following:

- U.S. Department of Housing and Urban Development ~~(HUD)~~
- California Department of Fair Employment and Housing ~~(DFEH)~~
- Housing Authority of the County of San Bernardino ~~County~~
- Inland Fair Housing and Mediation Board
- Inland Counties Legal Services, Inc.

The IFHMB is a private nonprofit agency that serves the County and parts of Riverside and Imperial Counties. IFHMB is funded by grants and awards and serves as an intermediary to assist individuals in resolving issues related to housing discrimination, home ownership, rental complaints, and disputes in court. Other services include foreclosure prevention counseling and senior services. IFHMB also provides fair housing outreach materials for public and private agencies' use in English, Spanish, and Chinese. These resources provide individuals with definitions and examples of housing discrimination, fair

housing as it relates to sex discrimination, and a social media fair housing toolkit. Their website also provides online resources such as links to COVID-19 housing and food resources, rental assistance, and eviction moratorium updates.

The Housing Authority of the County of San Bernardino (HACSB) provides rental assistance to low-income families by housing families in HACSB-owned or managed properties or through subsidized housing assistance to a landlord who rents their home to an assisted family. According to HACSB, they serve over 25,000 persons most of whom are seniors, individuals with disabilities, veterans, and children. In addition to housing, HACSB provides resources such as food assistance, education for youth, senior resources, a family self-sufficiency program, and a landlord participation incentive program.

Inland Counties Legal Services, Inc. (ICLS) is a non-profit organization providing legal services to low-income persons residing in the County and Riverside County. ICLS's housing work focuses on both increasing affordable and quality housing, and helps people stay in their homes. In addition to their housing and legal services, ICLS also offers educational workshops such as small business assistance.

Specific to the City, the City will make all reasonable modifications to policies and programs to ensure that people with disabilities and or special needs groups, including low-income groups, have an equal opportunity to enjoy all of its programs, services, and activities. In addition, the following resources are available to the City's residents:

- CA COVID-19 Rent Relief -Housing Is Key. will help income-eligible households pay rent and utilities, both for past due and future payments. The federal Consolidated Appropriations Act of 2021 provides funding to support the program and tenant (renter) protection laws signed by the current Governor, Governor Newsom.
- Emergency Housing Voucher Program. This new program is available to families in the County and Riverside County who are experiencing homelessness or at risk of being homeless; are fleeing domestic or dating violence, sexual assault. Applicants must be referred by a partner agency in the continuum of care or the county's Coordinated Entry System. Inland Counties Legal Services, Inc. website provides more information and resources related to this program.
- California Free Legal Answers. This program is offered by LawHelpCA.org and is available to California residents. Residents may submit a legal question relating to COVID-19 and receive guidance from a lawyer free of cost.
- Operation Grace. This program provides housing including rental assistance, emergency shelter and permanent supportive housing as well as programs to families at risk of losing their housing. They also work with housing partners to provide homeless prevention services.

The City is in compliance with existing fair housing laws and regulations. The City recognizes the effect that discrimination has in limiting housing choice and equal opportunity in renting, selling, and financing housing. The City offers fair housing information and links to the IFHMB and additional housing resources on the City's website, Housing Programs webpage.

Through programs in the housing element, the City will continue to provide resources to fair housing enforcement and outreach, as well continue to partner with IFHMB for fair housing enforcement in the City (**Program 15, Fair Housing Mediation**).The City is committed to furthering fair housing and in addition to providing services for enforcing fair housing related issues, the City will also continue to actively participate in the Analysis of Impediments to Fair Housing to evaluate discriminatory practices

in the County. Through **Program 26, Fair Housing Analysis**, the City is making a diligent effort to address fair housing issues in the City by evaluating the need to establish an Ad Hoc Fair Housing committee to provide policy recommendations to guide policies and programs in a manner that furthers fair housing. Through **Program 2, Residential Rental Enhancement and Rehabilitation Program**, the City will provide outreach services and incorporate fair housing training for landlords. The City will administer all programs and activities related to housing and community development in a manner to Affirmatively Further Fair Housing.

4.2. Segregation and Integration

Patterns of segregation have been commonly linked to poorer life outcomes in income, housing equity, educational attainment, and life expectancy, according to research from the University of California, Berkeley.[1] Affirmatively furthering fair housing involves overcoming patterns of segregation that foster inclusive communities.

4.2.1. Race and Ethnicity

Like much of Southern California, ~~Highland~~the City is becoming more racially and ethnically diverse. The population of the City~~Highland~~ is primarily White and/or Hispanic. As of 2018, ~~Highland~~City residents who reported being White were the majority. Non-Hispanic White residents made up 41.7 percent of ~~Highland's~~the City's population in 2000, and only made up 27.6 percent of the population in 2018. In regard to ethnicity, the number of Hispanic residents of any race increased significantly from 2000 to 2018, going from 36.6 percent of the population to now more than half the population. Residents of African American/Black or Asian race do not make up the majority of the population in any of the City's Census tracts, but there are over 4,000 African American/Black residents and Asian residents each within the City. From 2000 to 2018, the non-Hispanic African American/Black population has reduced from 11.7 percent of the population to 8.1 percent. The non-Hispanic Asian population has increased from 5.9 percent in 2000 to 9 percent in 2018. These changes could be attributed to several factors, including migration and childbearing, and trends can be complicated to discern when considering many individuals can be multiple races, and ethnicity is not exclusive of race. As shown in **Figure 1A**, Race and Ethnic Distribution, the proportion of the Hispanic population in ~~Highland~~the City is primarily in western Highland. The non-Hispanic White population is primarily in eastern Highland, with Boulder Avenue as the boundary distinguishing the eastern and western portions of Highland. The Hispanic majority in eastern Highland is sizeable or predominant for most of western Highland, whereas the White majority in eastern Highland is slimmer compared to the next predominant population. When compared to the broader region, **Figure 1B**, Race and Ethnic Distribution in the Region, it is revealed that the split in demographics continues east and west of the City. Fontana, Ontario, and San Bernardino which are located west of the City are predominantly Hispanic, whereas Redlands and Yucaipa which is located east of the City is predominantly White in population.

Generally, the average racial composition and number of people of different races or ethnicities in neighborhoods differs depending on location. To further examine this distribution, this assessment relies on a calculation of the average racial composition of neighborhoods experienced by members of each racial group. These are sometimes referred to as "exposure indices." This is because they show the

[1] Menedian, S., and S. Gambhir. 2018. "Racial Segregation in the San Francisco Bay Area," *Othering & Belonging Institute, UC BERKLEY.* https://belonging.berkeley.edu/study-finds-strong-correlations-between-segregation-and-life-outcomes-sf-bay-area.

exposure a given race group experiences with members of their own and other races (as a percentage of 100) in an average neighborhood of the city (or metropolitan area) being examined. In the City ~~of Highland~~, Hispanic residents are exposed to 42.7 percent Hispanic residents and 35 percent White residents. On the other hand, White residents are exposed to 30.7 percent Hispanic residents and 48.9 percent White residents.[2] This shows that White residents are more likely to be exposed to other White residents, and Hispanic residents are more likely to be exposed to other Hispanic residents. This is true to varying degrees for all races and ethnicities examined in ~~Highland~~the City. **Figure 2A**, Diversity Index, displays the levels of diversity across the different neighborhoods within the City. Higher diversity is seen in the predominantly Hispanic resident western core, whereas lower diversity is seen in eastern Highland. From 2010 to 2018, the diversity of neighborhoods in Highland improved slightly across the City. Figure 2B, Regional Diversity Index, shows that neighboring San Bernardino and other cities west of Highland are also higher in diversity. Diversity becomes lower moving eastward in the region.

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[2] Frey, W.H., and D. Myers. n.d. Segregation: Neighborhood Exposure by Race. CensusScope. https://www.censusscope.org/us/s6/p36448/chart_exposure.html.

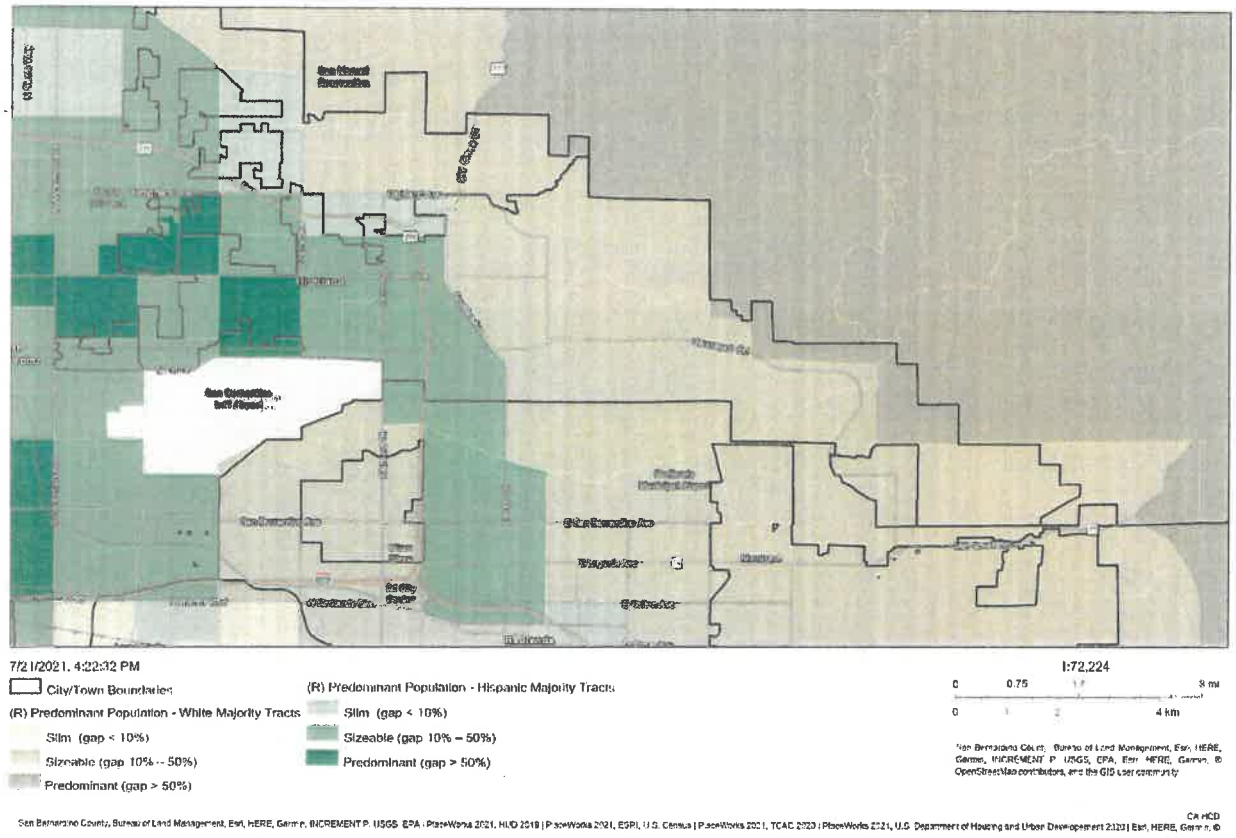


Figure 1A. Race and Ethnic Distribution[3]

[3] HUD (U.S. Department of Housing and Urban Development). n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

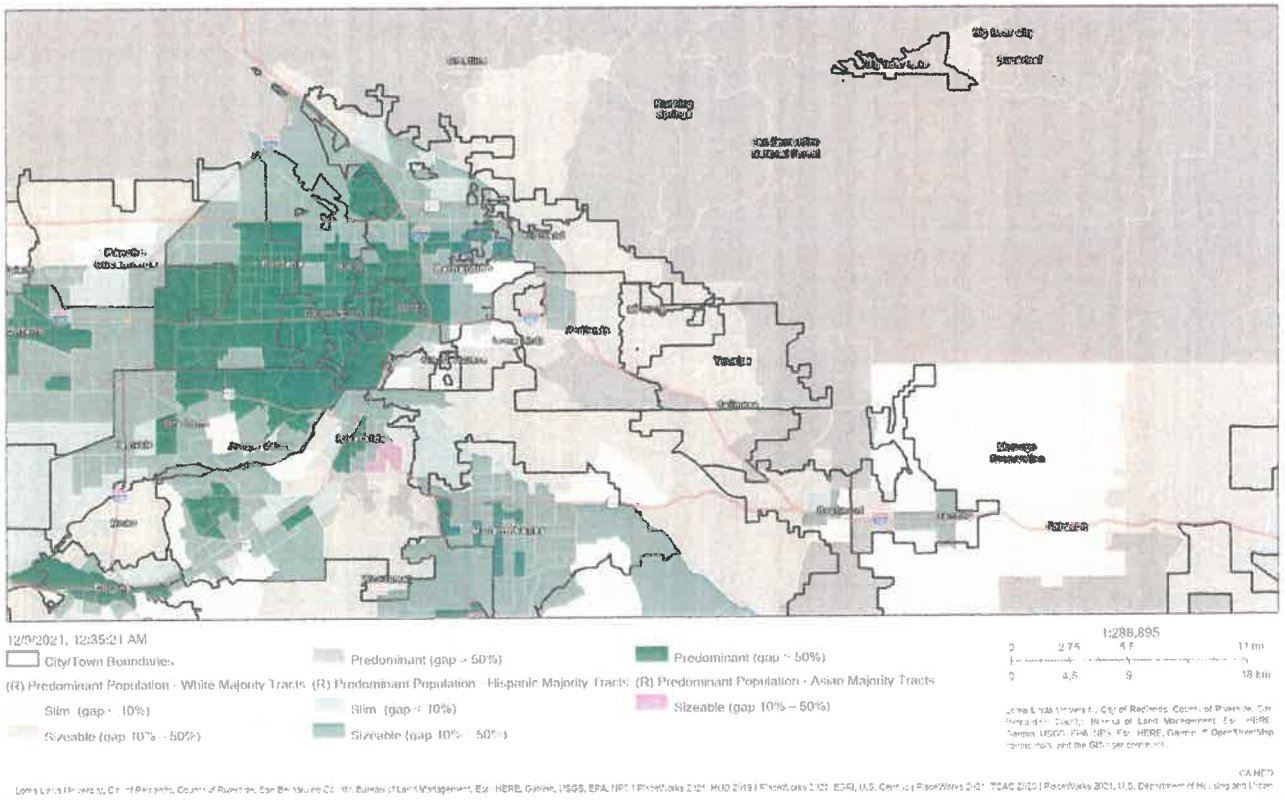


Figure 1B. Race and Ethnic Distribution in the Region[4]

[4] HUD (U.S. Department of Housing and Urban Development). n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

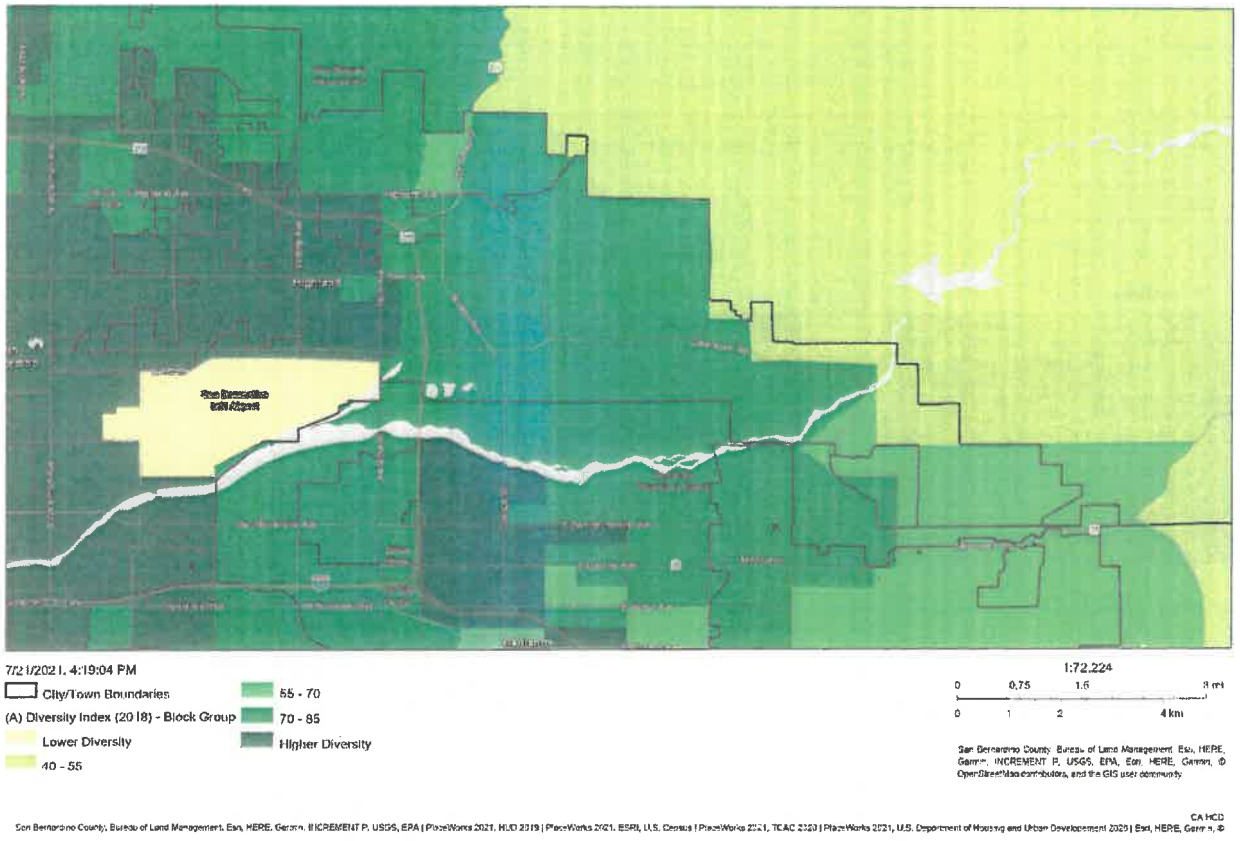


Figure 2A. Diversity Index[5]

[5] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

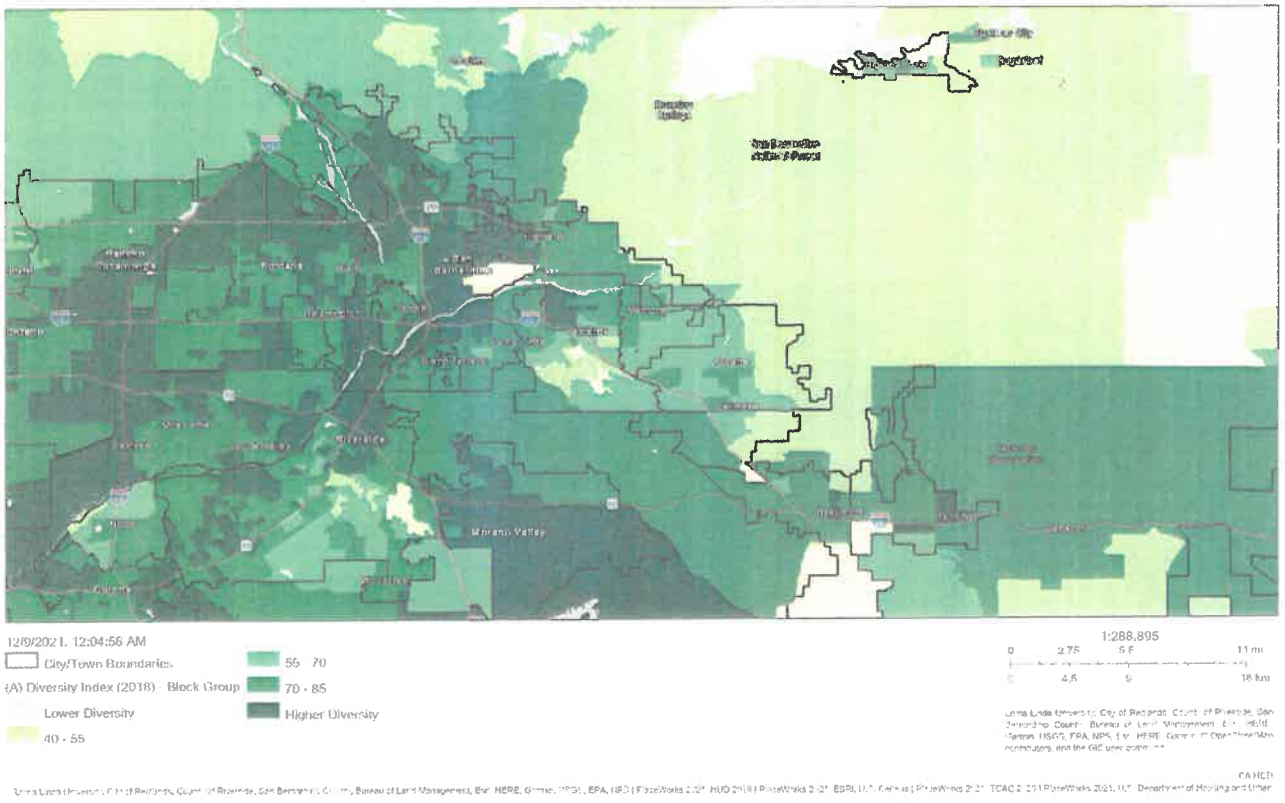


Figure 2B. Regional Diversity Index[6]

[6] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

Another measure of segregation between two groups is the dissimilarity index (DI). The DI measures the degree to which two ~~specific~~racial or ethnic groups are distributed across a geographic area. The DI varies between 0 and 100 and measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group. A ~~dissimilarity index~~DI of 0 indicates conditions of total integration under which both groups are distributed in the same proportions across all neighborhoods. A ~~dissimilarity index~~DI of 100 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group. This is a helpful metric because it can show which race or ethnicity is the most segregated. Generally, the City of Highland is moderately segregated. Highland received an index rating of 36.2 when comparing White and Hispanic populations, indicating that roughly 36.2 percent of Hispanic households are not distributed the same way as White households in the City. When comparing White and African American/Black populations, Highland has a similar score of 33.8. And when comparing White and Asian populations, Highland has a lower score of 18.4. Since the other ethnic/racial groups within the City have a small population percentage, the DI may be high even if the group is evenly distributed throughout the area. Thus, this assessment only compares White, Hispanic, African American, and Asian populations.[7]

4.2.2. National-Origin

The proportion of foreign-born population is consistent with San Bernardino County at 21 percent.[8] Those born in Latin America make up 70 percent of the foreign-born population in Highland and the second largest subset are those born in Asia at 25 percent of the foreign-born population. This is a significant portion of the population and should be given consideration for fair housing outreach and education.

4.2.3. Language

In the City and across the region, approximately 42 percent of residents speak languages other than English at home.[9] Individuals who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English have limited English proficiency. Language barriers can increase the discrimination that immigrant populations may face in access to housing. Generally, immigrants with limited resources often face difficulty in acquiring adequate housing as they adjust to their new surroundings and obtain employment. As a result, housing problems such as overcrowding and overpayment are often more prevalent among those populations that recently immigrated.

4.2.4. Household Income

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities, although economic factors that affect a household's housing choice are not necessarily a fair housing issue. Fair housing issues occur when relationships among household income, household type, race/ethnicity, and other factors create misconceptions, biases, and differential treatments. Discriminatory housing practices of the past, such as redlining, restrictive zoning,

[7] Frey, W.H., and D. Myers n.d. Segregation: Dissimilarity Indices. CensusScope. https://www.censusscope.org/us/s6/p33588/chart_dissimilarity.html.
[8] U.S. Census Bureau. 2019. Demographic Trends. American Community Survey (ACS) 2014–2019.
[9] U.S. Census Bureau. 2019. Demographic Trends. ACS 2014–2019.

urban renewal, and steering, while illegal today, have led to a disproportionate gap in household wealth based on race and ethnicity.

Within the City in 2019, the "Asian Alone" group had the highest poverty rate of any race or ethnicity at 22.6 percent. The Hispanic population has the next highest poverty rate for a racial or ethnic group in the City at 21.8 percent. A total of 17.9 percent of the Black, non-Hispanic population in the City were below the poverty level in 2019. The White, non-Hispanic population was far more fortunate, with only 9 percent of residents below the poverty level for 2019.[10]

Household income in the City is displayed in **Figures 3A through 5A** at the local level, and Figures 3B through 5B at the regional level. **Figure 3A**, Median Income, shows that the lowest median income in the City is found in the western core. All communities east of Palm Avenue have median household incomes at or above the State average of $87,100. Figure 3B, Median Income in the Region, shows that the lower median income in west Highland is similar to that of the adjacent C1ity of San Bernardino. Throughout the entire region, median income varies. ~~However, the median income is likely to be below the State average in the urban cores of each city.~~ Much of the same western area has over 30 percent of residents in poverty, as can be seen in **Figure 4A**, Poverty Status. The farthest southwest portion of the City has over 40 percent of residents in poverty. Areas to the east of this concentration of poverty have the next lowest incomes and percentages of people in poverty. Poverty for the most part is below 30 percent for much of the region, apart from Riverside and San Bernardino, as shown in Figure 4B, Poverty Status in the Region. **Figure 5A**, Low to Moderate Income, displays the percent of the population with low or moderate income, furthering the points made within this section. Additionally, Figure 5B, Low to Moderate Income in the Region, illustrates that most populated tracts in the Inland Empire cities have low to moderate income populations that are more than 25 percent.

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[10] U.S. Census Bureau. 2019. Poverty Status in the Past 12 Months. 2019 ACS 5-Year Estimates.

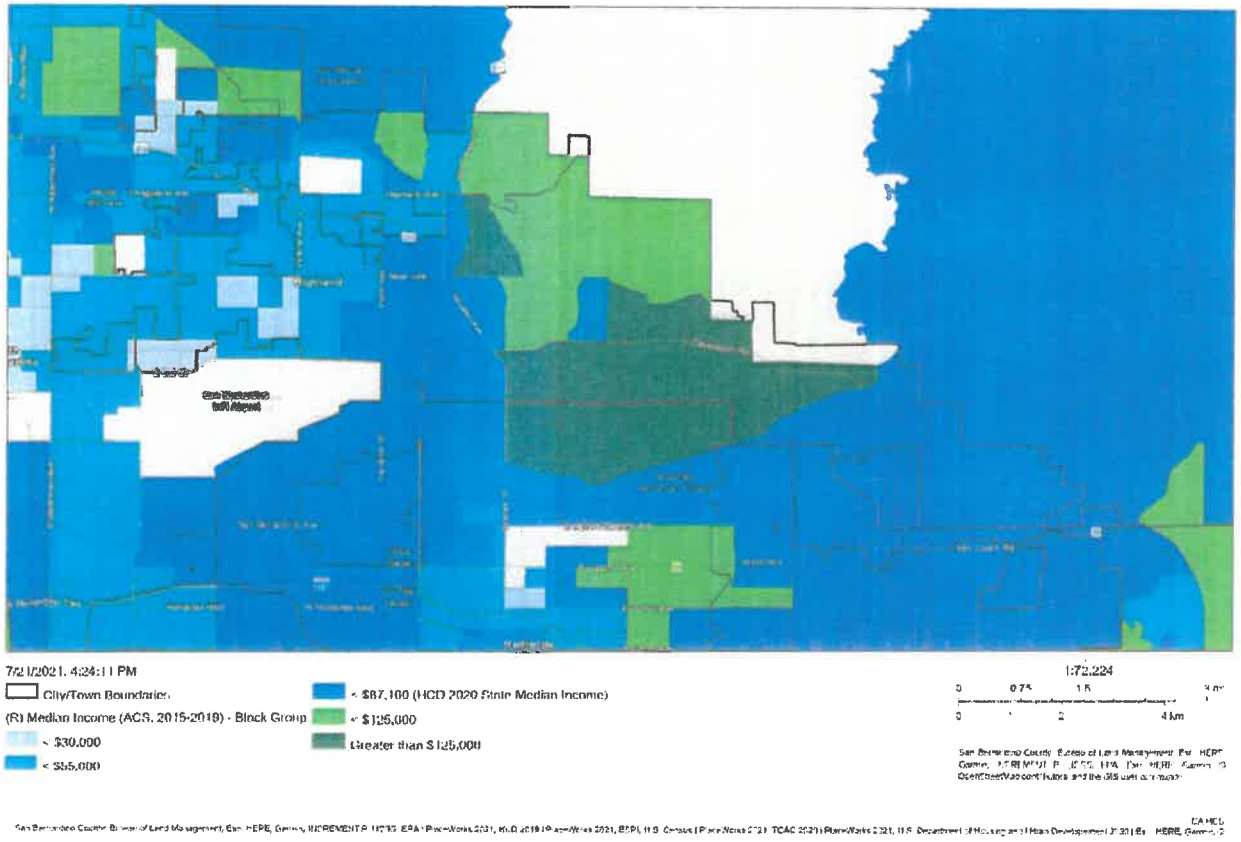


Figure 3A. Median Income[11]

[11] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

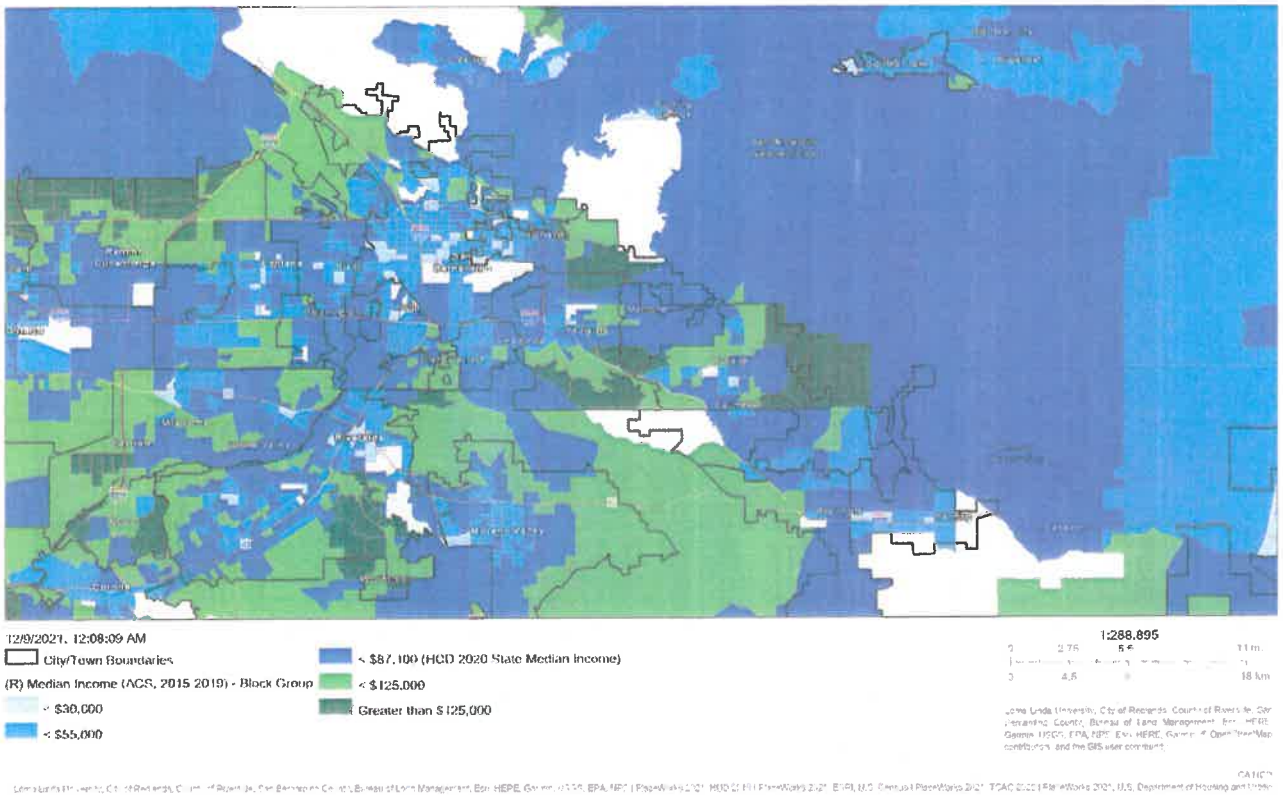


Figure 3B. Median Income in the Region[12]

[12] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

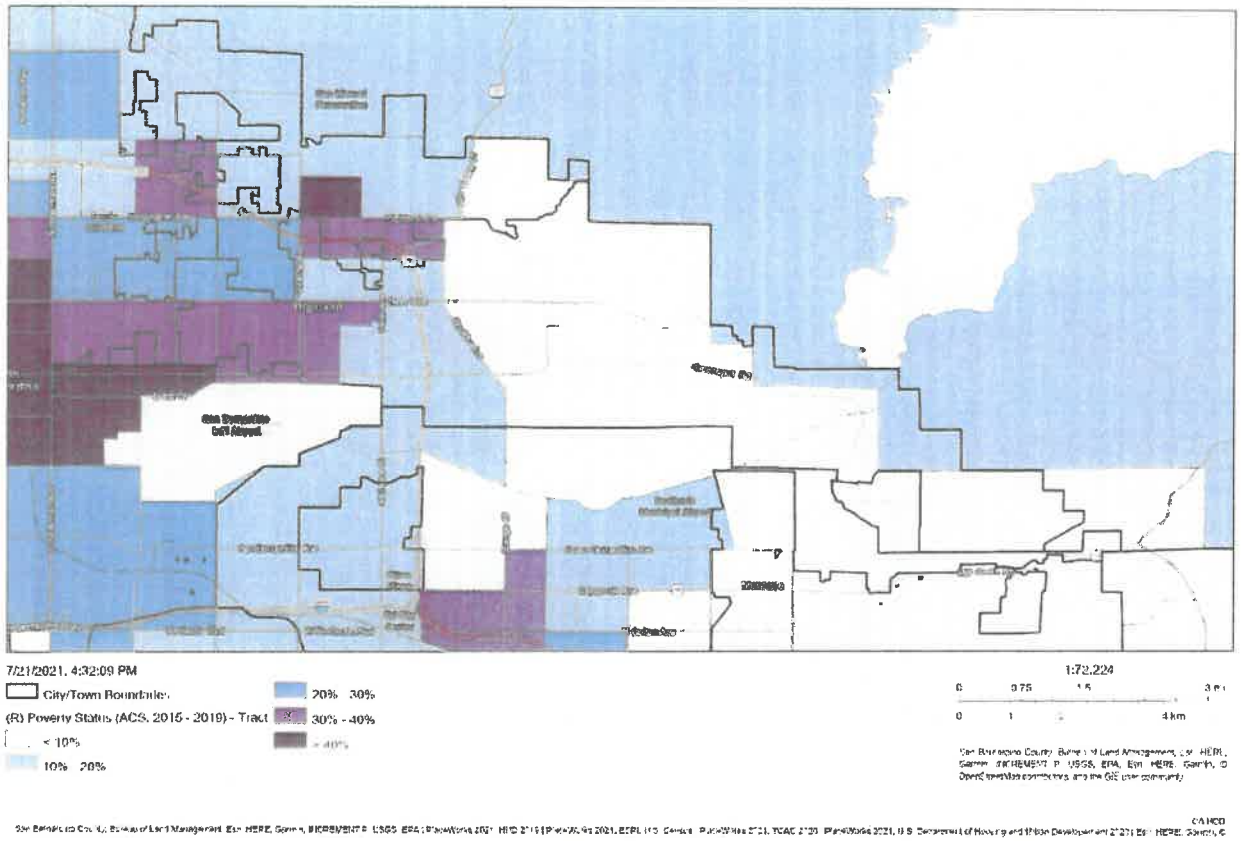


Figure 4A. Poverty Status[13]

[13] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

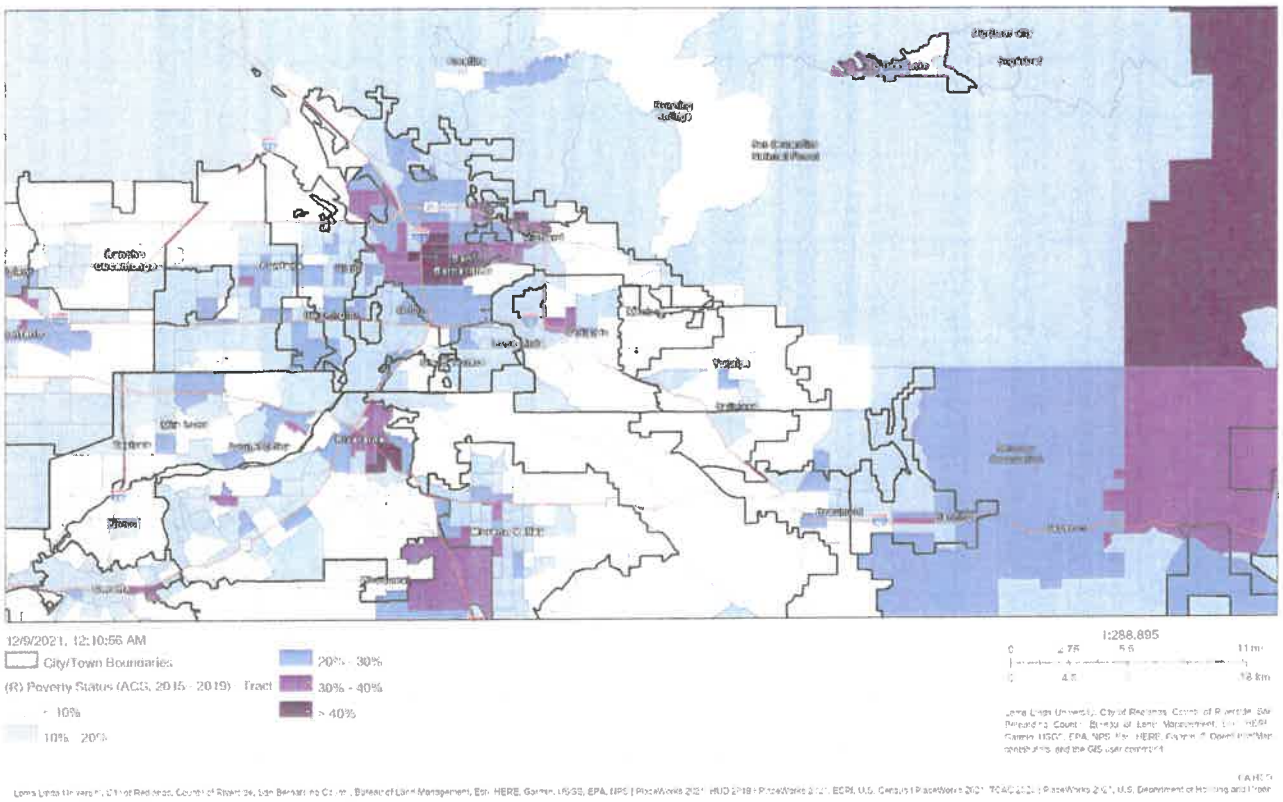


Figure 4B. Poverty Status in the Region[14]

[14] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

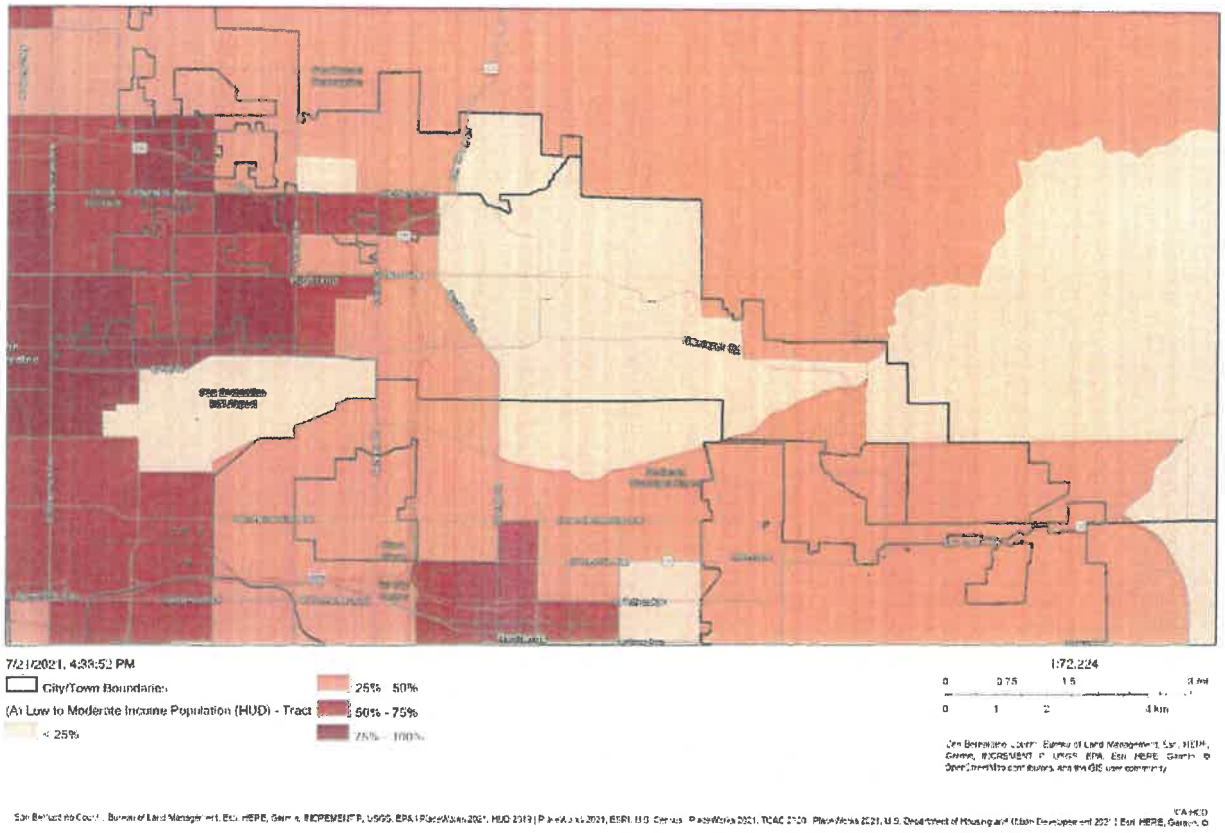


Figure 5A. Low to Moderate Income[15]

[15] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

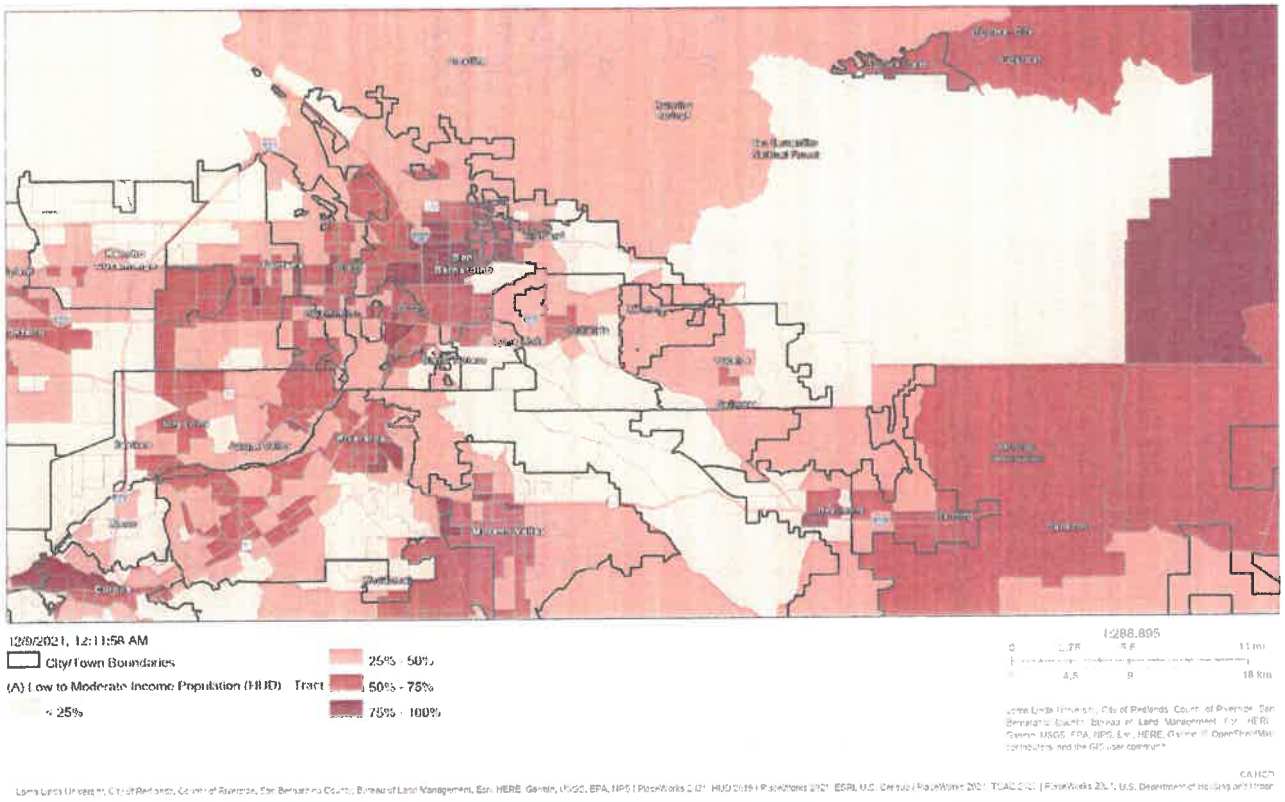


Figure 5B. Low to Moderate Income in the Region[16]

[16] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.2.5. Familial Status

Family structure is something that impacts the care of children, type of housing needed, financial needs, and more. Single-parent households require more time to take care of children than married or cohabitating couples, which can impact the jobs available to parents, income levels, and the amount of support afforded to children. Family structure is something that has evolved over time in the United States, with fewer couples marrying, and cohabitation occurring more often. Families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords or property owners may charge larger households a higher rent or security deposit. According to the American Community Survey (ACS) 2014–2019, there were 4,209 family households with married couples and 2,410 single-parent households in the City. **Figure 6A**, Children in Single-Mother Headed Households, shows that single-mother headed households are more prevalent in the westernmost portions of the City. At the regional level, **Figure 6B**, Children in Single-Mother Headed Households in the Region, show that the number of single-mother headed households in Highland are as low as many places in the region. **Figure 7A**, Children in Married Couple Households, shows that the farthest southeast portion of the City has the highest proportion of children in married couple households. Needs of single-parent households include affordable housing and proximity to schools, childcare centers, transportation, recreation, employment, and other opportunities. **Figure 7B**, Children in Married Couple Households in the Region, illustrate that the City has comparable percentages of children in married couple households to other cities. The trend follows where suburban areas tend to have a higher percentage than the urban core.

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The household living structure of adults also can be examined for potential fair housing issues. Housing is much more affordable when costs and responsibilities are shared with a spouse. Areas with high rates of adults living alone can cause people to pursue the most affordable living situation possible, which can lead to overcrowded living situations or substandard housing. **Figure 8A**, Adults Living Alone, shows that there are not many adults in the City who live alone. Likewise, **Figure 8B**, Adults Living Alone in the Region reveals that not many adults live alone throughout the Inland Empire. The cost of living in the region may be too high for households of single income. **Figure 9A**, Adults Living with a Spouse, shows the lowest rates of adults living with a spouse was in western Highland. The highest rates of adults living with a spouse are in northern Highland. Furthermore, **Figure 9B**, Adults Living with a Spouse in the Regions, shows that northern Highland has one of the highest rates of adults living with a spouse in general when compared to the region.

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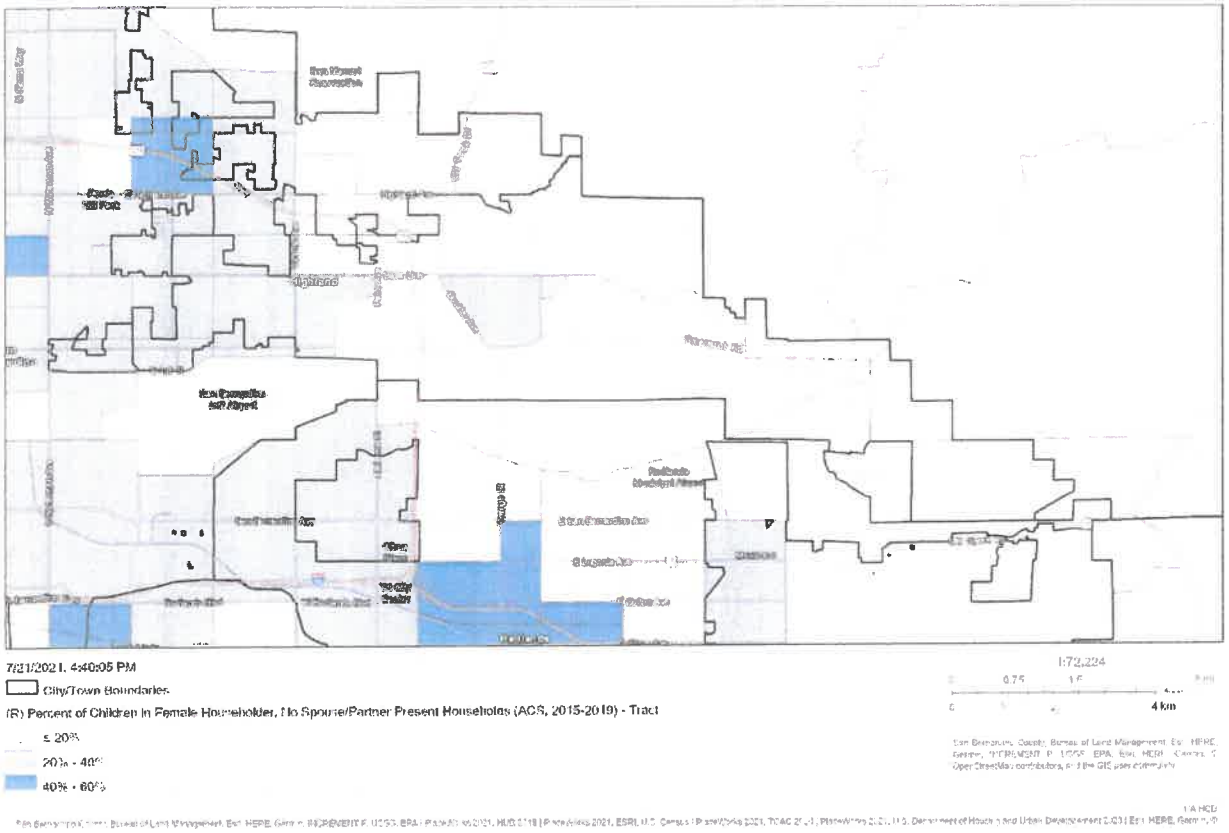


Figure 6A. Children in Single-Mother Headed Households[17]

[17] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

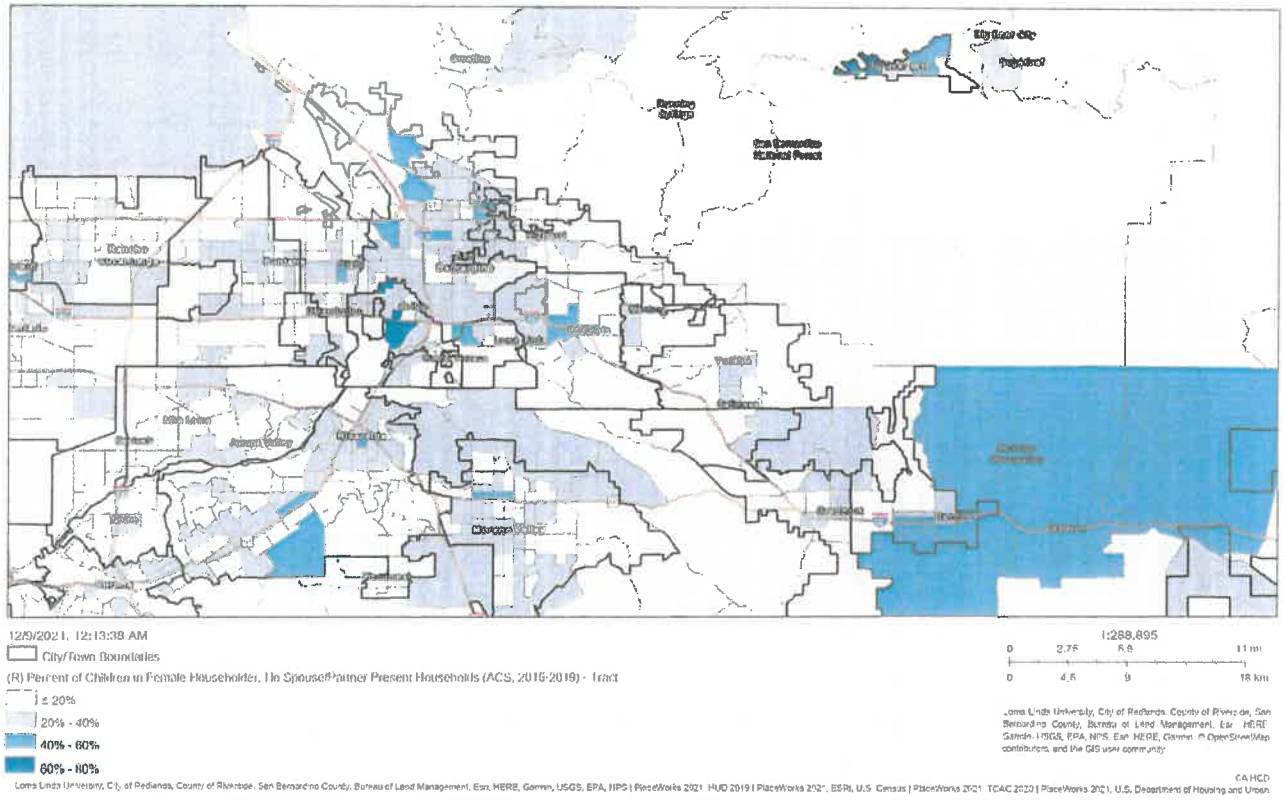


Figure 6B. Children in Single-Mother Headed Households in the Region[18]

[18] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

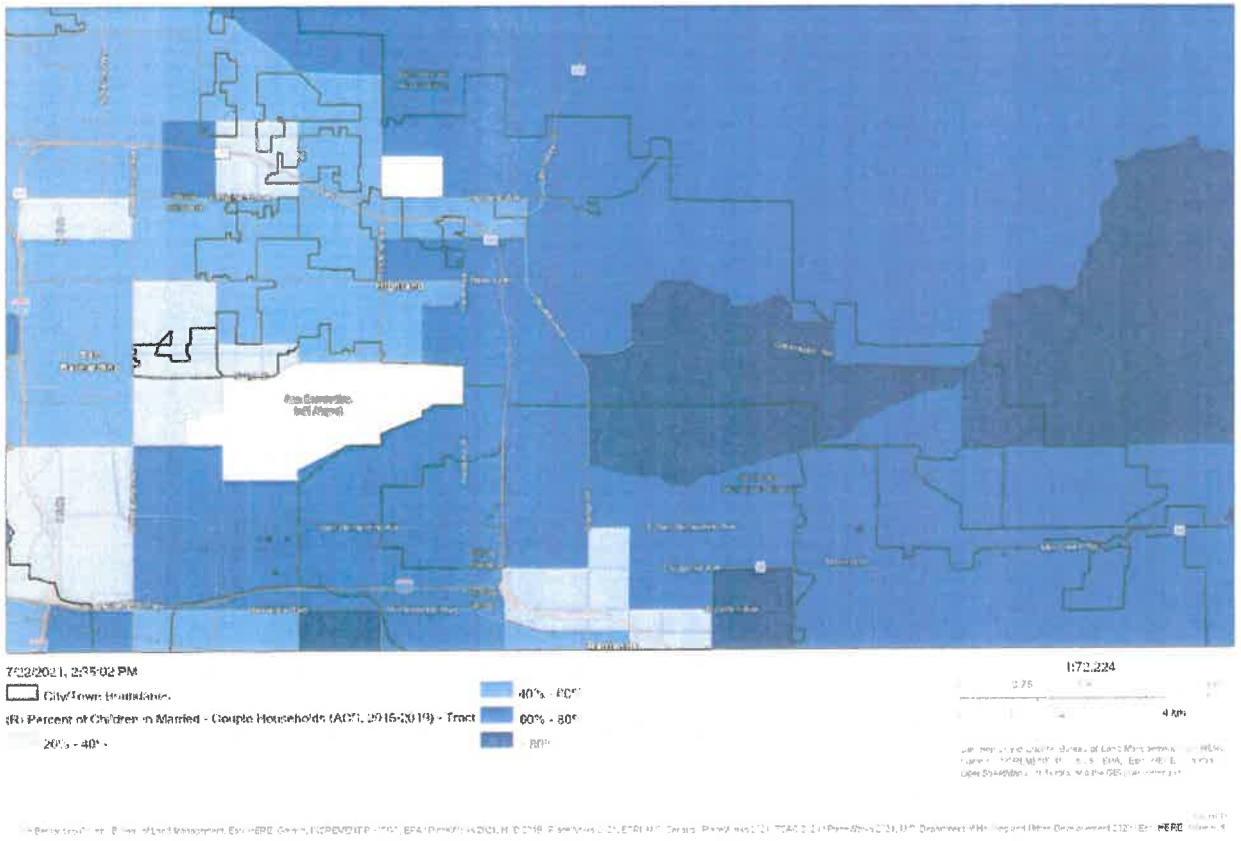


Figure 7A. Children in Married Couple Households[19]

[19] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

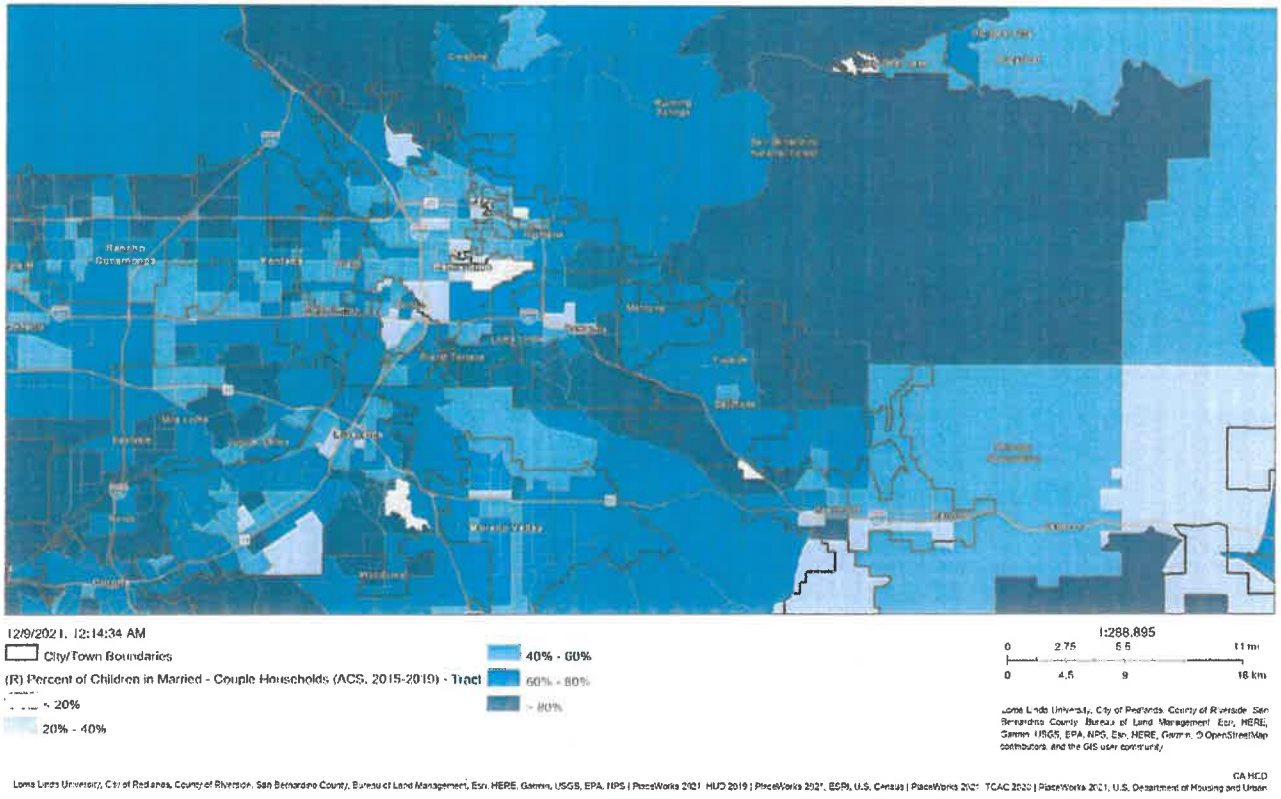


Figure 7B. Children in Married Couple Households in the Region[20]

[20] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

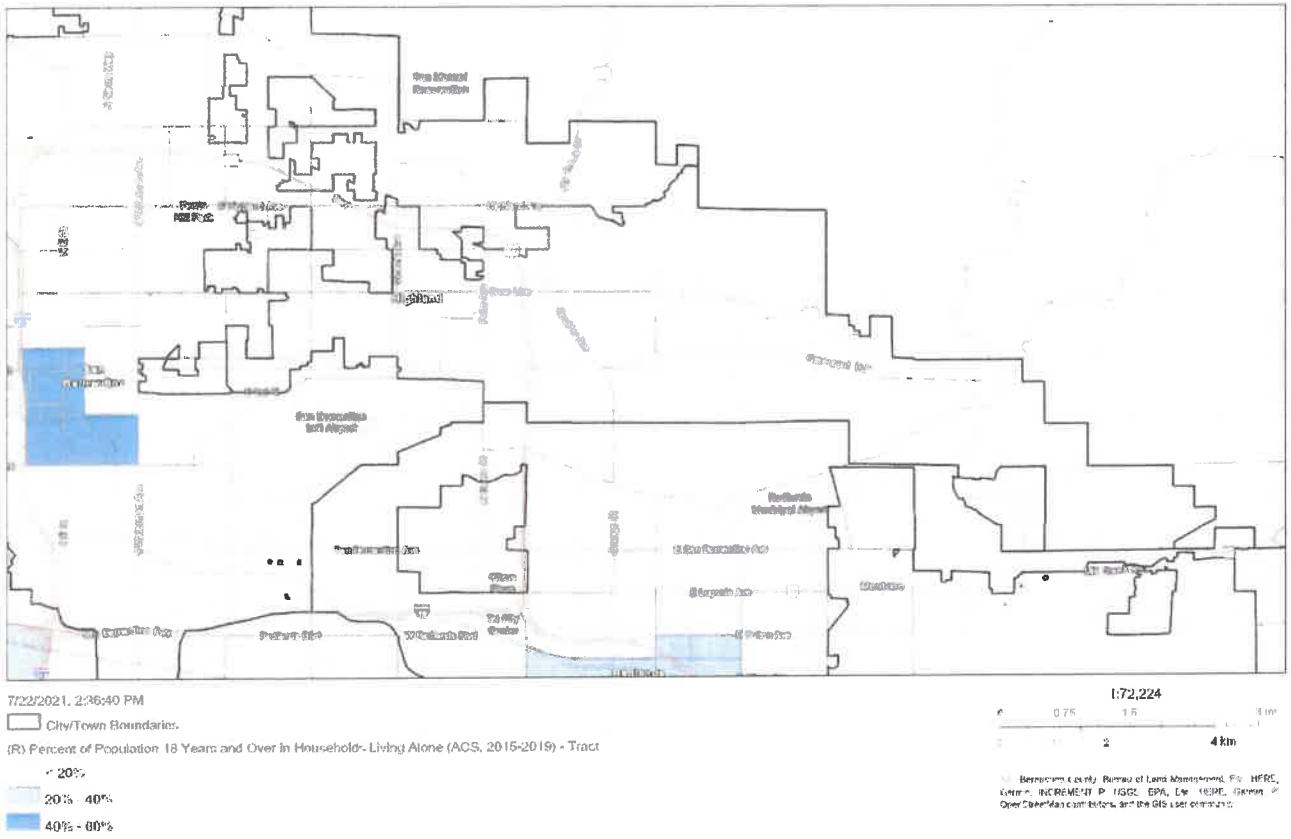


Figure 8A. Adults Living Alone[21]

[21] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

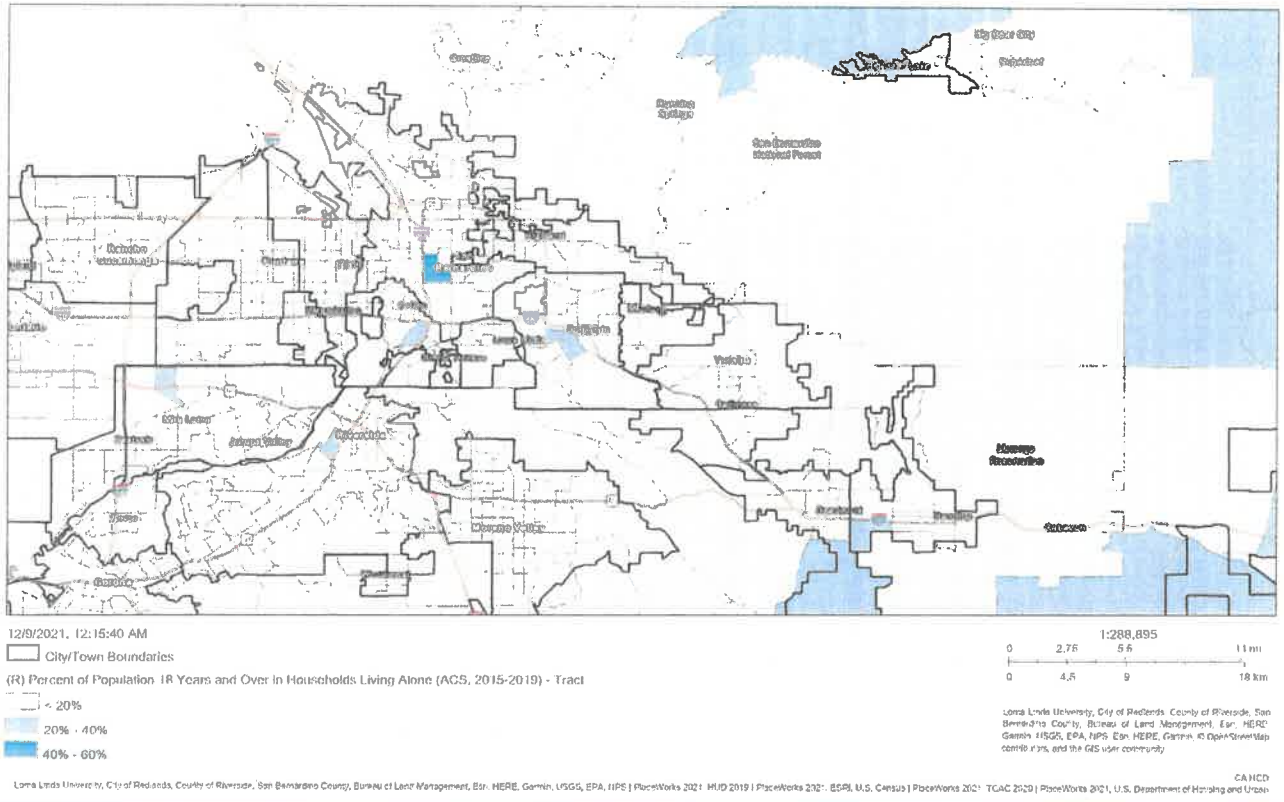


Figure 8B. Adults Living Alone in the Region[22]

[22] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

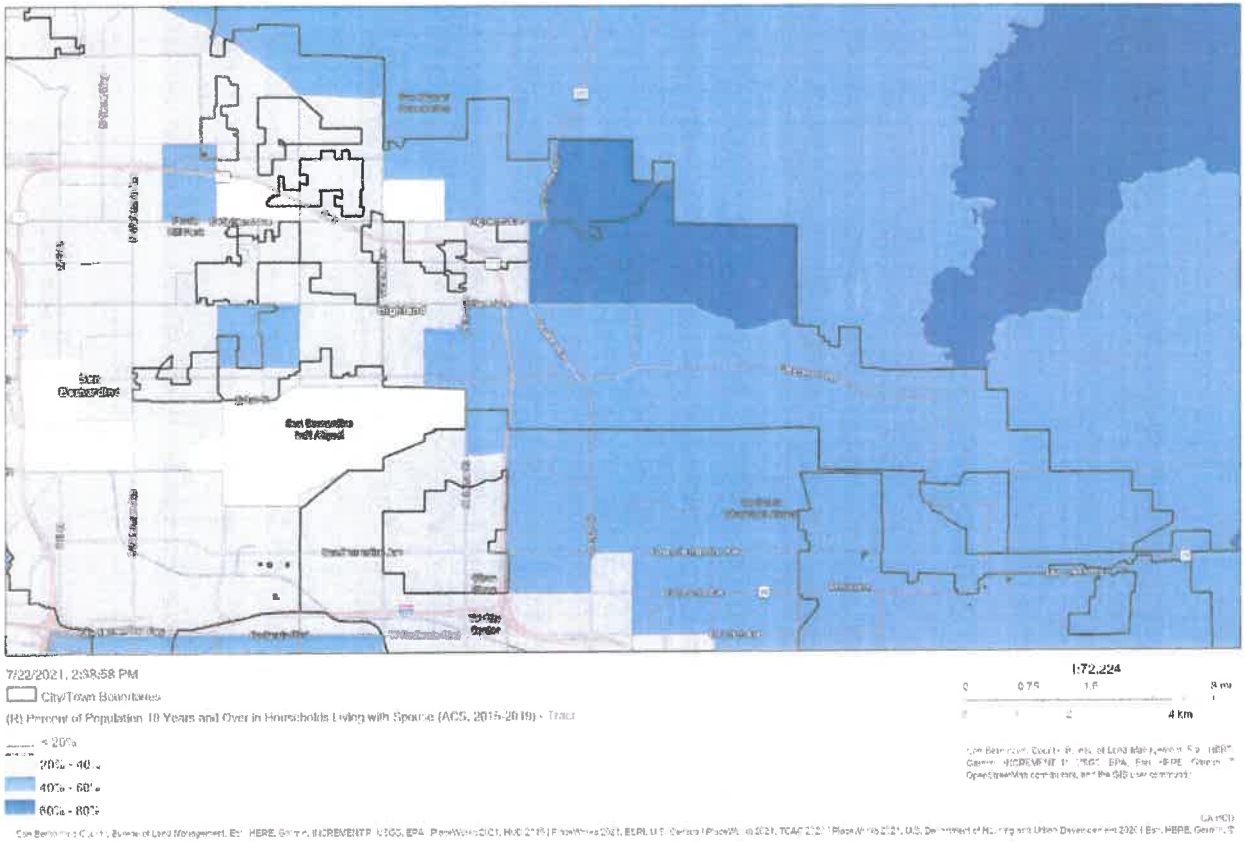


Figure 9A. Adults Living with a Spouse[23]

[23] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

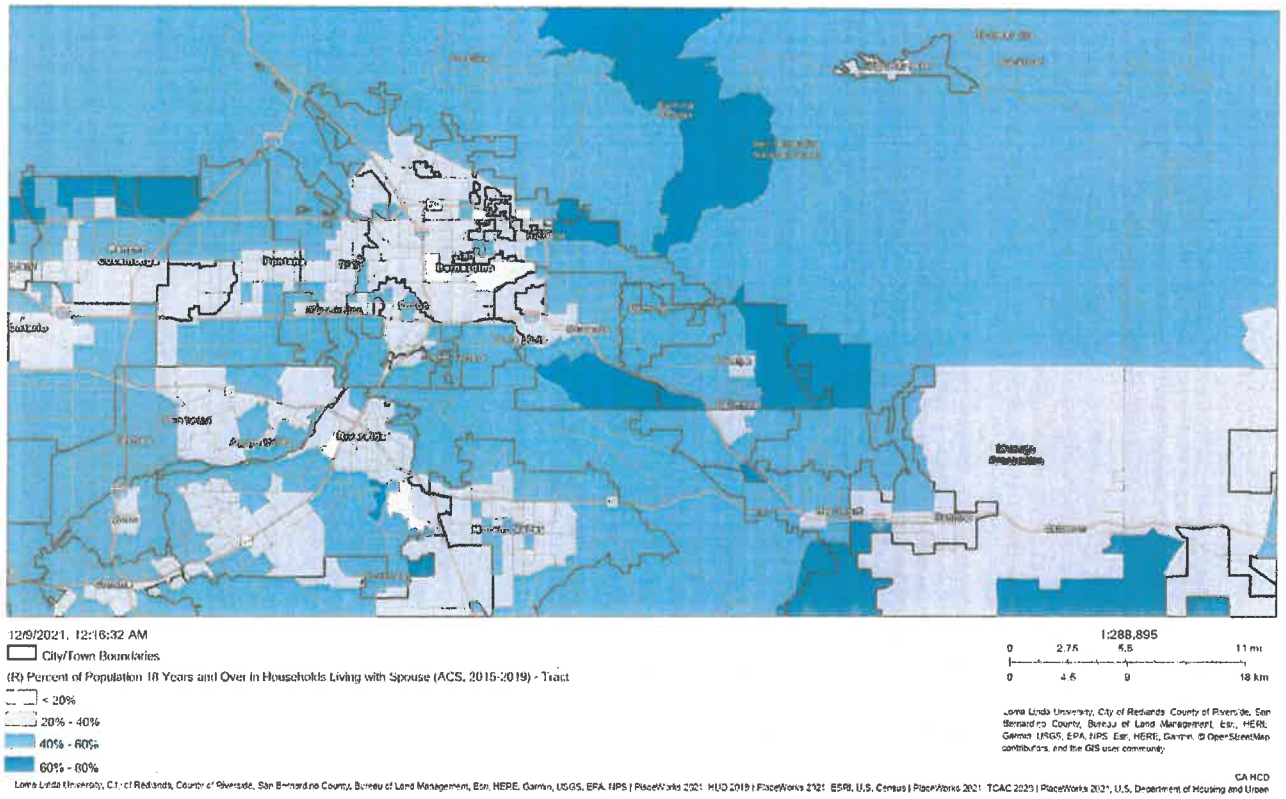


Figure 9B. Adults Living with a Spouse in the Region[24]

[24] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.2.6. Persons with Disabilities

Fair housing choice for persons with disabilities can be compromised based on the nature of a person's disability. Persons with physical disabilities may face discrimination in the housing market because of the need for wheelchairs, home modifications to improve accessibility, or other forms of physical assistance. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords or property owners might refuse to rent to tenants with a history of mental illness. Further, neighbors may object when a house becomes a group home for persons with mental disabilities.

According to population disability data available through ACS 2014–2019, 6.5 percent of the population in the City under 65 years of age have some type of disability. In general, many persons with disabilities have lower incomes since the disability often affects their ability to choose from a range of employment opportunities. Thus, persons with disabilities often have a greater need for affordable housing, as well as supportive services. Persons with disabilities are relatively evenly spread throughout the City, with higher concentrations falling within tracts outside of the central core, as seen in **Figure 10A**, Population with a Disability. Similarly, **Figure 10B**, Population with a Disability in the Region, shows that persons with disabilities is evenly spread throughout the region as well.

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4.2.7. Neighborhood Segregation

As previously mentioned, residents in highly segregated neighborhoods often experience poorer life outcomes. The typologies in **Figure 11A**, Neighborhood Segregation, identify which race/ethnicity populations have more than 10 percent representation within the given tract. **Figure 11A** demonstrates a relatively diverse mix of ethnic/racial groups within a given tract. The City is primarily "Latinx-White" in the east and "3 Group Mix" in the west. Both figures identify a concentration of non-White groups in the western portion of the City. The more diverse areas are also associated with a higher concentration of renters and poverty status. **Figure 11B**, Neighborhood Segregation in the Region, illustrates that much of the Inland Empire have tracts that are either predominantly Latinx-White or 3-4 Group Mix. As with eastern Highland, much of the eastern region is primarily Latinx-White. Highland is one of the few cities in the region with a tract that is primarily Black-Latinx, along with Moreno Valley, Rialto, and San Bernardino.

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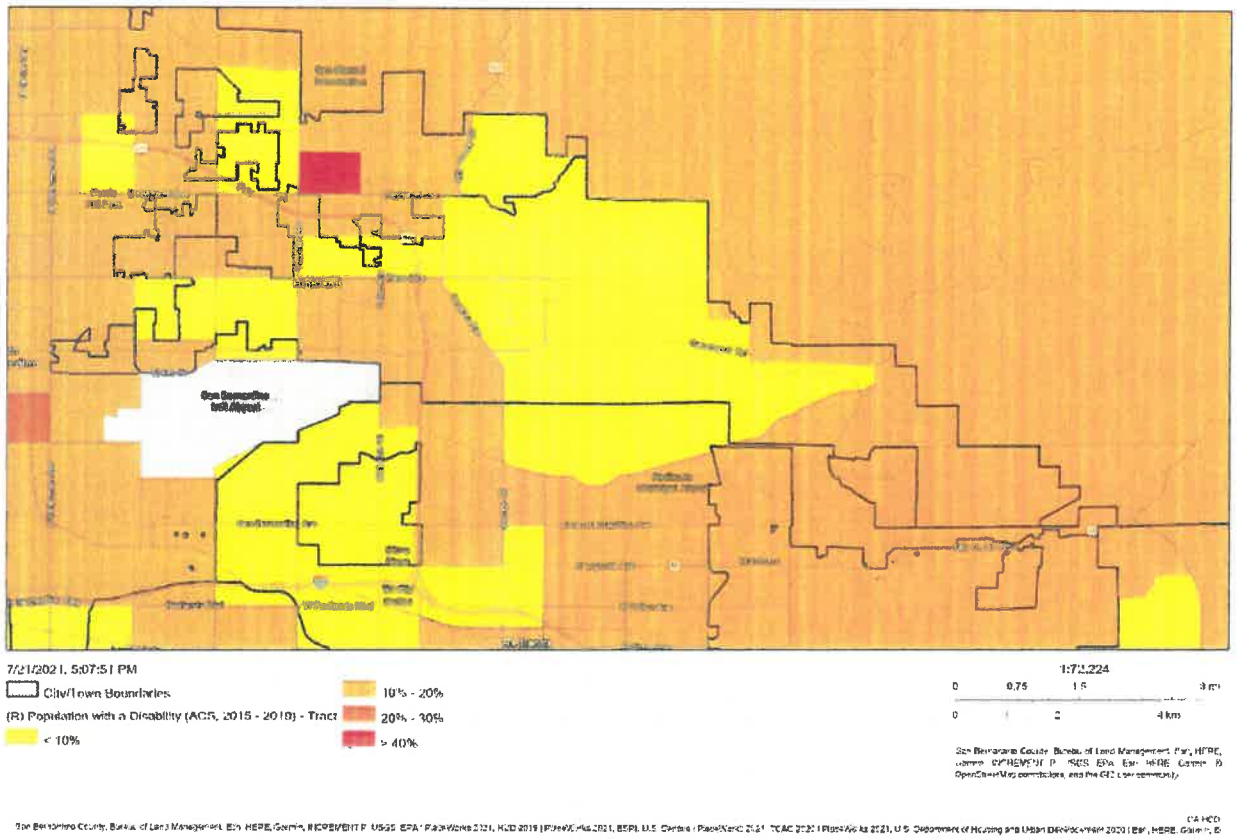


Figure 10A. Population with a Disability[25]

[25] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

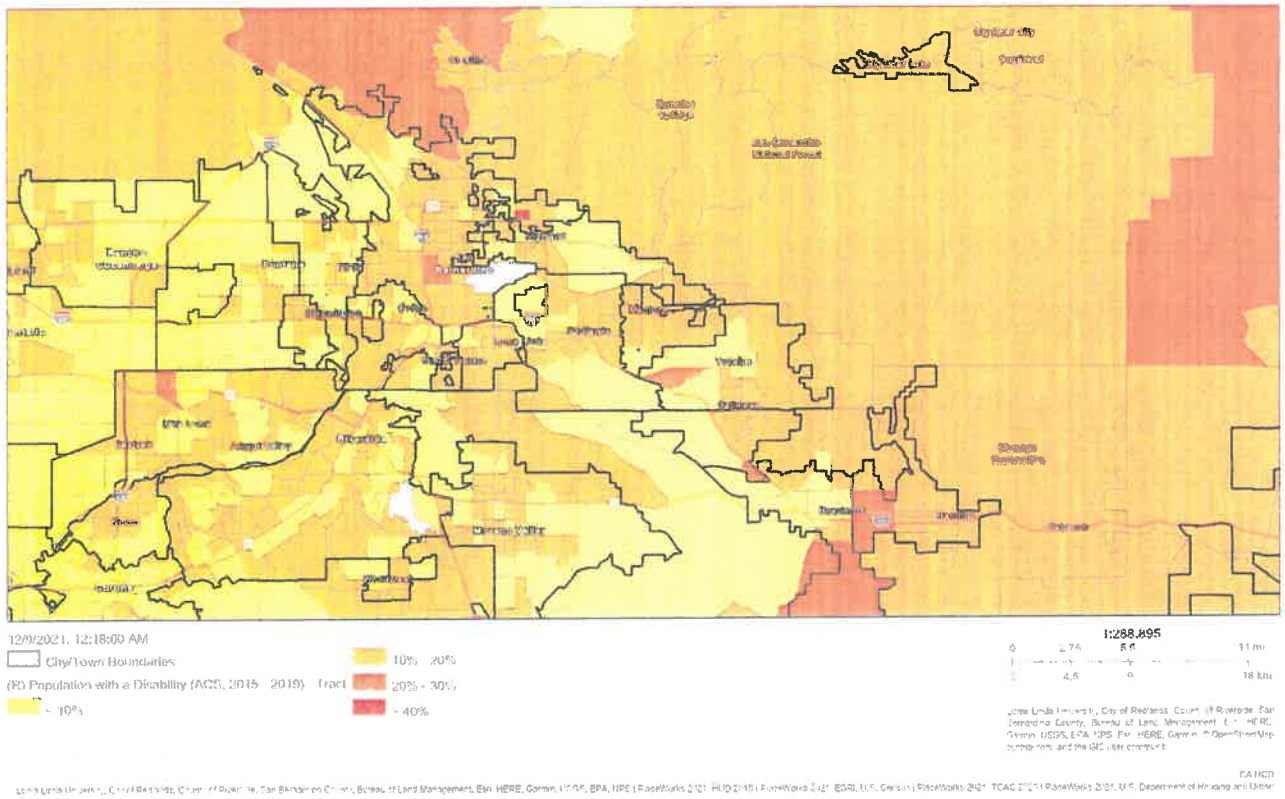


Figure 10B. Population with a Disability in the Region[26]

[26] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

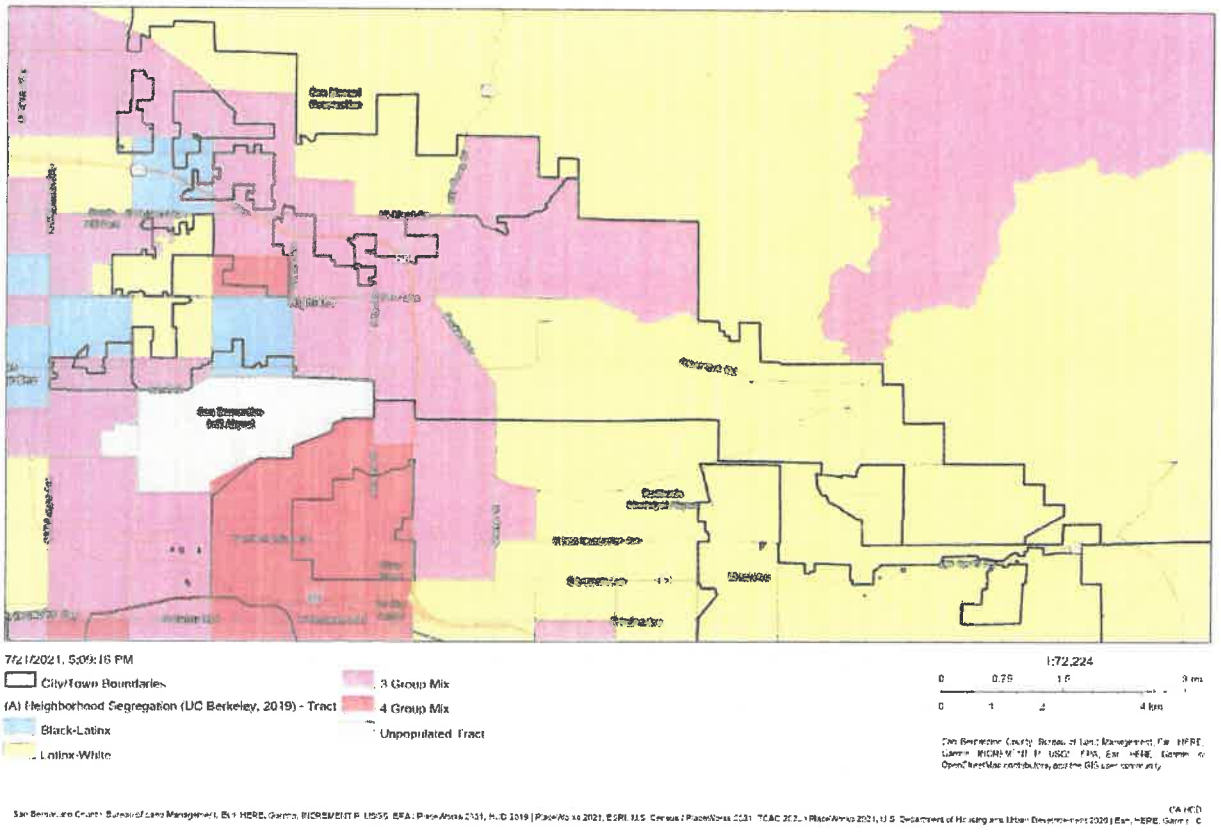


Figure 11A.1 Neighborhood Segregation[27]

[27] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

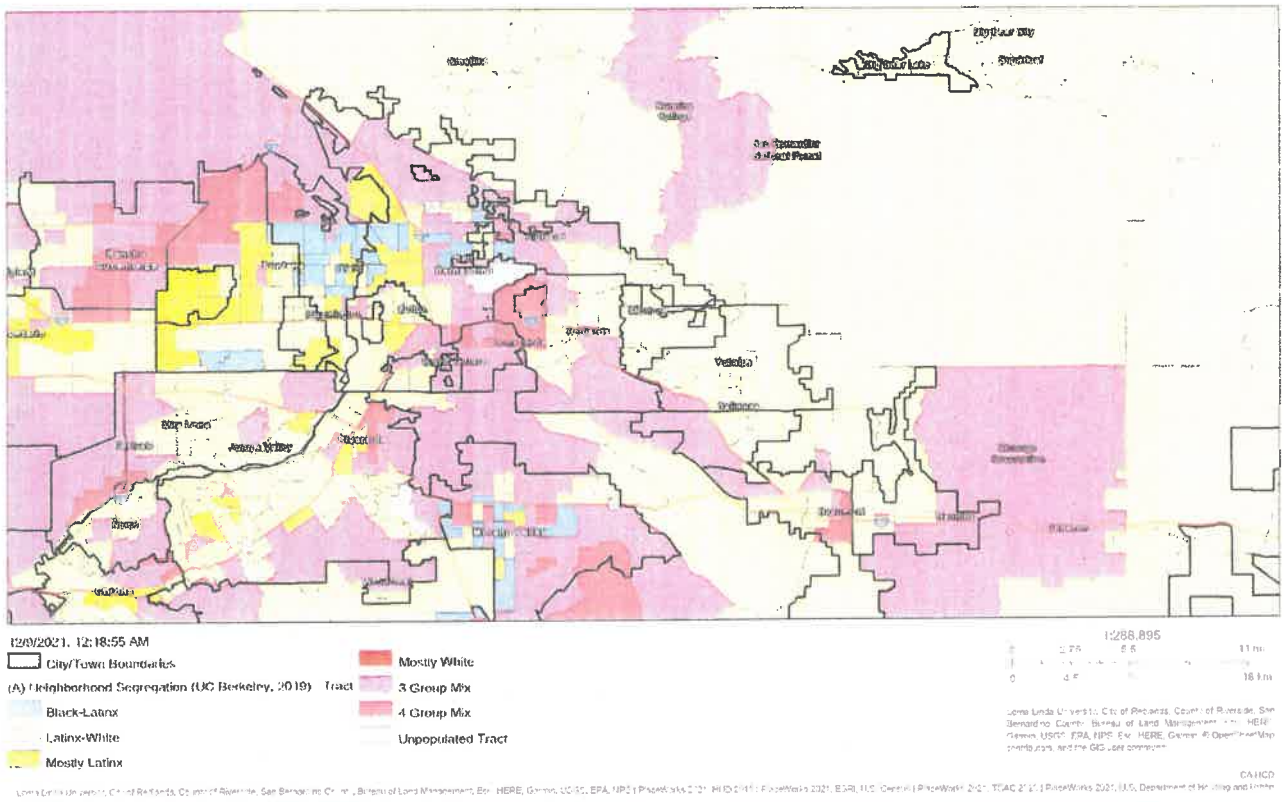


Figure 11B. Neighborhood Segregation in the Region[28]

[28] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.3. Racially and Ethnically Concentrated Areas of Poverty

Racially or ethnically concentrated areas of poverty (R/ECAPs) are neighborhoods with concentrations of both poverty and singular races or ethnicities. These are generally Census tracts with a majority of non-White residents and a poverty rate of 40 percent and higher in the City, or three times the average tract poverty rate for San Bernardino County. In addition to highlighting historic discrimination, R/ECAPs also have lower economic opportunity in the present day. **Figure 12A**, R/ECAP and Segregation and Poverty, shows the three Census tracts considered R/ECAPs in the City are concentrated in areas near the City of San Bernardino to the west. The farthest west R/ECAP tract is Census Tract 65, the middle R/ECAP tract is Census Tract 74.07, and the upper R/ECAP tract is Census Tract 76.01. These are also near areas of high segregation and poverty identified by the California Tax Credit Allocation Committee (TCAC). This is consistent with the concentration of R/ECAP parcels in the City that are near the City of San Bernardino. R/ECAPs are uncommon throughout the region, as shown in **Figure 12B**, R/ECAP and Segregation and Poverty in the Region, and are mainly found in the cities of Ontario, Riverside, and San Bernardino.

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These R/ECAPs contain approximately 17.4 percent of the City's population, which amounts to about 9,500 people. Two of the three R/ECAPs are primarily residential areas, while the farthest west of the three is more of a mix between commercial and residential. According to 2019 U.S. Census data, each of the three R/ECAPs contain more than 10 percent above the rate of the Hispanic population for the overall City. Additionally, the central R/ECAP tract has more than double the proportion of African American/Black residents than the City overall. All three R/ECAP tracts have significantly higher levels of poverty than the City's total, with the farthest west R/ECAP having the highest poverty rate at 48.7 percent of the population. The west and middle R/ECAPs have nearly three times as many renters as homeowners, and the northernmost R/ECAP is consists of approximately half renters and half homeowners.

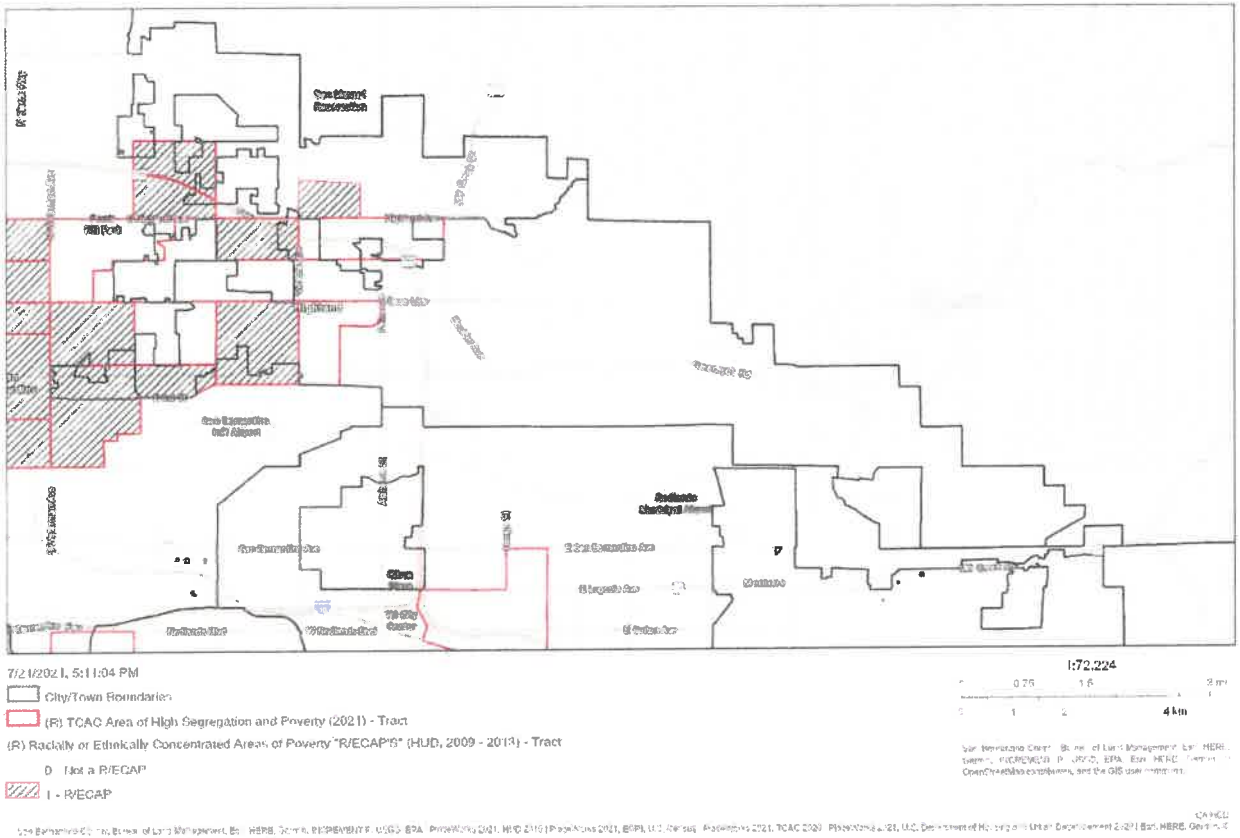


Figure 12A. R/ECAP and Segregation and Poverty[29]

[29] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

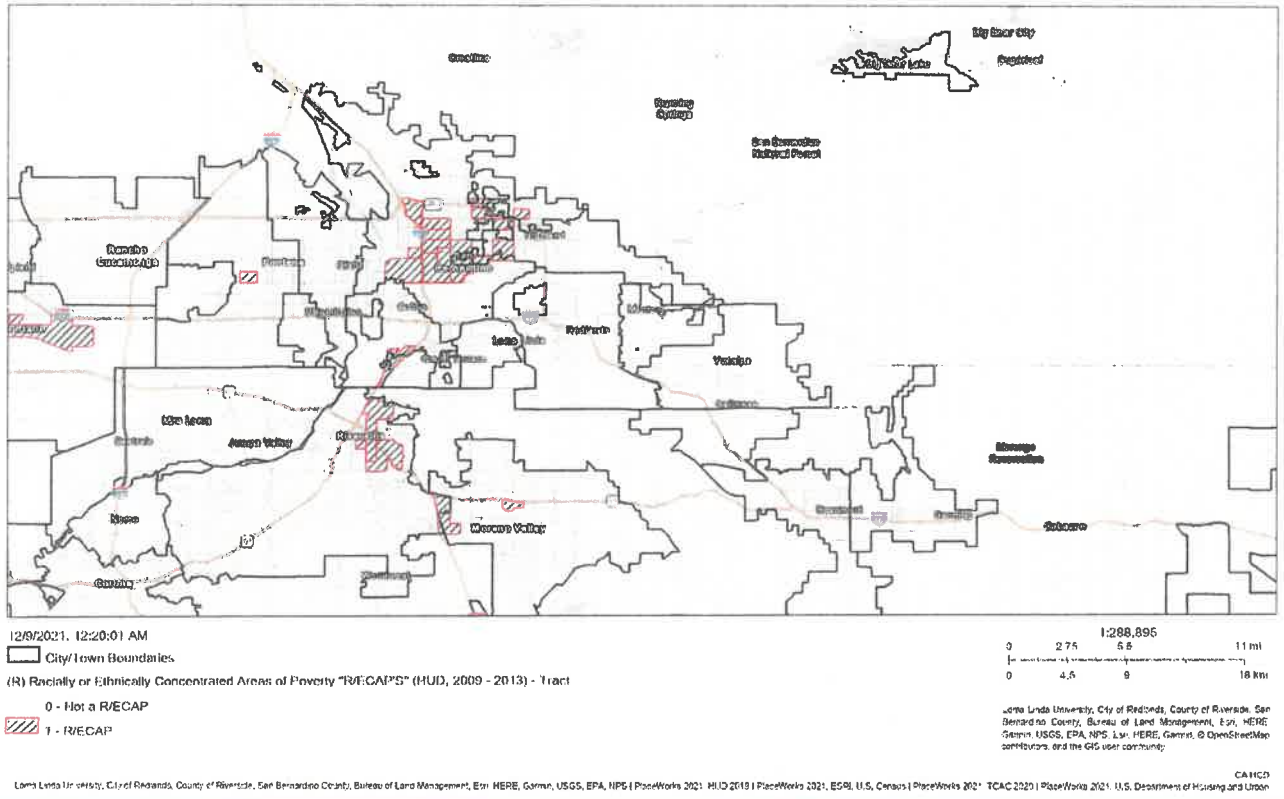


Figure 12B. R/ECAP and Segregation and Poverty in the Region[30]

[30] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.3.1. Racial Concentrations in Areas of Affluence

In addition to an analysis of R/ECAPs, this Affirmatively Furthering Fair Housing analysis considers racially concentrated areas of affluence (RCAA). Scholars at the University of Minnesota Humphrey School of Public Affairs have created the RCAA metric to tell the story of segregation in the United States more fully. Based on their research, RCAAs are defined as Census tracts where:

- 80 percent or more of the population is White, and
- the median household income is $125,000 or greater (slightly more than double the national the median household income in 2016).

While this is a useful measure nationwide, the California Department of Housing and Community Development (HCD) has adjusted the RCAA methodology to better reflect California's relative diversity. HCD's RCAA data is not yet available, but **Figures 1A and 3A, above, provide a preliminary analysis that displays the areas where the White population exceeds 50 percent of the population and where the median household income is $125,000 or greater. The tracts with the highest proportion of the White population are Census Tracts 060710111.01 and 060710115.00, which overlap within Highland but are primarily located outside of the City's boundary. The block groups where the median income exceeds $125,000 are Block Group 2, Tract 79.01 and Block Group 3, Tract 79.04.**

4.4. Patterns Over Time

Historically in the United States, housing discrimination (both explicit and covert) has occurred through land use policy and zoning, mortgage lending practices, landlord or property owner decisions on rental applications, and patterns of public and private investment and disinvestment. These trends have resulted in residential segregation based on race, ethnicity, income, disability, and other characteristics, and has limited housing choices and access to opportunities for many Americans, especially for communities of color.

Significant historical events in the City that influenced early land use patterns include the forced relocation of the San Manuel Band of Mission Indians to a reservation in 1891, followed by settlements along Base Line and Palm Avenue then Palm Avenue and Pacific Street during westward expansion. The growth of the citrus industry in the early and mid-1900s gave rise to large farms and packing houses throughout the City.

In 1942, Norton Air Force Base began operation, and the surrounding Highland neighborhoods experienced significant development of small and mid-sized tract homes with corresponding commercial development along Base Line and other east/west corridors.

In the 1980s, developer Mobile Oil purchased approximately 1,800 acres in the eastern portion of the City and received approval from the County of San Bernardino to construct a new community with multiple housing types, common areas, and amenities. The establishment of this "new community" is the defining event that led to the perceived split in the City between east/west, new/old, and more/less affluent. The construction of the 210 Foothill Freeway exacerbated this perception, along with the division of school districts along similar boundaries.

The City was incorporated in 1987 and derived its early land-use policy from the County of San Bernardino. In 1991, the City formed a Redevelopment Agency that identified a target area of lower-

income neighborhoods, vacant and underutilized land, and areas in need of basic infrastructure. The Redevelopment Agency adopted goals and policies to "increase, improve and preserve the quality of low/moderate income housing throughout the project areas and the City." Housing needs goals included securing long-term affordability covenants, creating rehabilitation programs for rental units and single-family homes, providing a down payment assistance program, working with the County of San Bernardino Department of Housing, identifying funding programs and housing needs, and identifying inclusionary and replacement housing. The Redevelopment Agency was successful in many of its endeavors, including the construction of 184 low-income apartment units, rehabilitation of several hundred single-family homes, a new 17-acre park, a community center, a library, a police station, and miles of infrastructure almost wholly on the west side of the City. The Redevelopment Agency was dissolved by the State of California in 2012.

During the 4th and 5th Cycle Housing Elements, the City rezoned numerous properties to permit medium- and high-density housing by right, and rezoned properties mid-block along Base Line from commercial to residential. Properties in the vicinity of Interstate 210, with excellent access to bus lines, were rezoned Mixed Use to allow a variety of housing types in conjunction with a new pharmacy, grocery store, retail, and restaurant. The City has engaged several affordable housing developers to construct a lower-income senior housing project on Housing Authority property on Central Avenue, south of Base Line.

Public participation is of the utmost importance as the City continues to modify and improve its housing policy. The City follows all public noticing policies, has a newly updated website, social media accounts on several platforms, and easily accessible staff. Public outreach has occurred at the City's Community Center, Library, City Hall, Chamber of Commerce events, and remotely via computer applications.

4.4.1. Mortgage Loan Access

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. Lending policies and requirements related to credit history, current credit rating, employment history, and the general character of applicants permit lenders to use a great deal of discretion, and in the process, deny loans even though the prospective borrower would have been an acceptable risk. Despite the illegality of discriminatory practices in the housing credit system, patterns of inequality still exist.

Discriminatory practices in home mortgage lending have evolved in the past five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, ethnic minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. During the recent rise of the subprime loan market,[31] discriminatory lending practices became more subtle. By employing high-pressure sales practices and deceptive tactics, some mortgage brokers pushed minority borrowers into high-cost subprime mortgages that were not well-suited to their needs and led to financial problems.

[31] TD Bank Corp. 2007. *A Primer on the U.S. Sub-Prime Market.* April 30, 2007. The subprime mortgage market ballooned in 2005 and 2006 to 20 percent–25 percent of all new mortgages, capturing more than twice the market share seen over the prior 10 years.

Conventional and Government-Backed Financing

According to the Federal Financial Institutions Examination Council (FFIEC) data for 2016, approximately 48,209 households (for a total of $13,388,132) applied for conventional loans in the Metropolitan Statistical Area of (MSA) of Riverside–San Bernardino–Ontario, California. Among all applications received that year, 25,573 loans were originated and 3,469 where denied. The population of White persons participated at the highest level, submitting 27,278 conventional loan applications. The Hispanic population, the second highest participants, provided the market with 12,921 loan applications. Even though the Hispanic population make up 50 percent of the total population within the MSA, they only accounted for 27 percent of all loan applications submitted. The African American population submitted just 296 applications in 2016, which was the lowest participation rate amongst the four largest populations. There was no significant variance in rate of denial amongst racial/ethnic groups.

According to the FFIEC data, approximately 35,874 households (for a total of $9,823,136,000) applied for government-backed loans in the MSA of Riverside–San Bernardino–Ontario, California. Among all applications received in 2016, the number of loans originated was 25,573, and the number of percentage of applications denied was approximately 10 percent. When broken down by race and ethnicity, participation in the market varied. The population of White persons once again had the highest participation levels, similar to conventional loans, submitting 27,278 government-backed loan applications, amounting to $7,251,363,000. The population of African American persons were the lowest participants in government-backed loans, with only 296 applications submitted in 2016, for a total amounting to $80,132,000. With all racial/ethnic groups denial rates being within 4 percent of each other as well as the MSA area as a whole, there was no significant variance in rate of denial.

Subprime Lending

According to the Federal Reserve, prime mortgages are offered to persons with excellent credit and employment history, and income adequate to support the loan amount. Subprime loans are loans to borrowers who have less-than-perfect credit history, poor employment history, or other factors, such as limited income. Subprime lenders generally have interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. Although subprime lending cannot in and of itself be equated with predatory lending, studies have shown a high incidence of predatory lending in the subprime market. The FFIEC data does not provide information on which loans were subprime loans. As such, analysis on this topic is difficult. It will be important to monitor lending institutions with high loan approval rates in the City, should any be discovered.

4.4.2. Demographic Trends

Patterns developed over time in the City are apparent in the demographic, household, and housing characteristics. Between 2000 and 2019 the median age of the population has increased by 4.5 percent, the proportion of the Hispanic population increased by 16 percent. Overpayment of homeowners declined in nearly all tracts across the city between the 2010-2014 period and the 2015-2019 period and overpayment by renters saw similar declines in many tracts across the City during the same period. The Needs Assessment, provided in **Appendix B, Community Profile**, provides additional data and analysis of the demographic patterns within the City. The effects of the previously discussed historical patterns over time can be seen through the current demographic makeup of the City.

4.5. Disparities in Access to Opportunity

Neighborhoods with high access to opportunity are places that result in strong economic, environmental, health, and educational outcomes for residents. Lower-income households and racially segregated communities are more highly concentrated in distressed and disadvantaged areas with low access to opportunity where residents are disproportionately exposed to crime, environmental hazards, and a lack of investment, resulting in poorer physical and mental health outcomes. Disadvantaged areas tend to have less access to quality employment opportunities, leaving lower-income households at a greater risk of remaining financially insecure.

When affordable housing is located in high-opportunity/high-resource areas, this increases access to resources such as quality schools, employment, transportation, low poverty exposure, and environmentally healthy neighborhoods. Research indicates that among various economic and social factors, being in proximity to certain amenities can encourage positive critical life outcomes.[32] When affordable housing is dispersed throughout new development in high-resource residential areas, as opposed to being concentrated in existing areas of poverty, research consistently shows that residents of such affordable housing developments have increased quality of life, better access to opportunity and prosperity, and higher school performance. For example, a study by the Urban Institute's Metropolitan Housing and Communities Center found that lower-income residents who reside in mixed-income communities report an increased sense of neighborhood safety; improved employment prospects; improved job readiness and job promotions; better emotional, mental, and physical health; and significant improvements in children's academic performance.

Federal and State agencies have shown an increased focus in promoting increased access in high-opportunity areas. This trend is evident in the States' allocation of Low-Income Housing Credit dollars, the primary subsidy that is available for developing and preserving affordable housing. To allocate these credits, the California Housing Finance Agency (CalHFA) develops a competitive scoring system. In recent years, the scoring system has been adjusted to promote investment in affordable housing in areas with access to opportunity. Several agencies, including the Department of Housing and Urban Development and the HCD in coordination with TCAC, have developed methodologies to assess and measure geographic access to opportunity (including education, poverty, transportation, and employment) in areas throughout California. The Opportunity Map created by TCAC and HCD (using data from 2020) is used to identify areas in the region whose characteristics are shown by research to support positive economic, educational, and health outcomes for families—particularly long-term outcomes for children. Further, this section will review access to opportunity in relation to education, economic development, environment, transportation, and access to opportunities for persons with disabilities.

High-resource areas are those areas, according to research, that offer low-income children and adults the best chance at certain positive life outcomes: economic advancement, high educational attainment, and good physical and mental health. The Opportunity Map plays a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity. The 2021 TCAC/HCD Opportunity Map identifies the areas east of Boulder Avenue as high-resource areas (**Figure 13A**, Opportunity Map). To the areas west of Boulder Avenue, tracts are identified as high segregation and

[32] Freddie Mac and the National Housing Trust. 2020. Spotlight on Underserved Markets: *Opportunity Incentives in Low-Income Housing Credit Qualified Allocation Plans.* https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity_incentives_in_lihtc_qualified_allocation_plans.pdf.

poverty, low resource, and moderate resource. The high segregation and poverty area aligns with the R/ECAP zones identified in previous sections. Economic, educational, and environmental indexes show low scores in the identified R/ECAP areas. In contrast to the opportunity areas shown in the map, many of the City's resources related to commercial and governmental services, such as mental health facilities, mass transit access, parks and recreational facilities, food access, and other commercial services, are located in the eastern portions of the City. At a regional scale, **Figure 13B**, Regional Opportunity Map, illustrates a pattern of highest resources being concentrated in suburbs and foothill communities, which may explain why Highland's highest resources are to the northeast part of the City.

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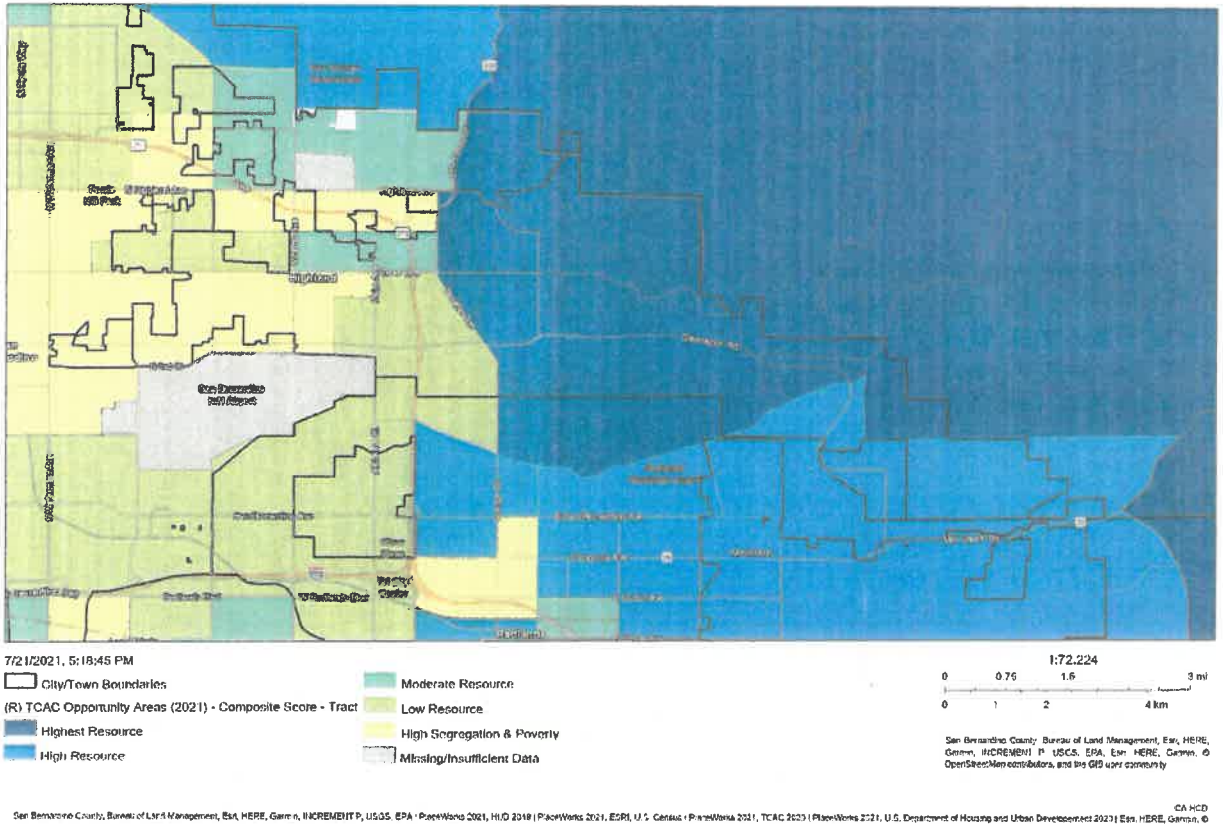


Figure 13A. Opportunity Map[33]

[33] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

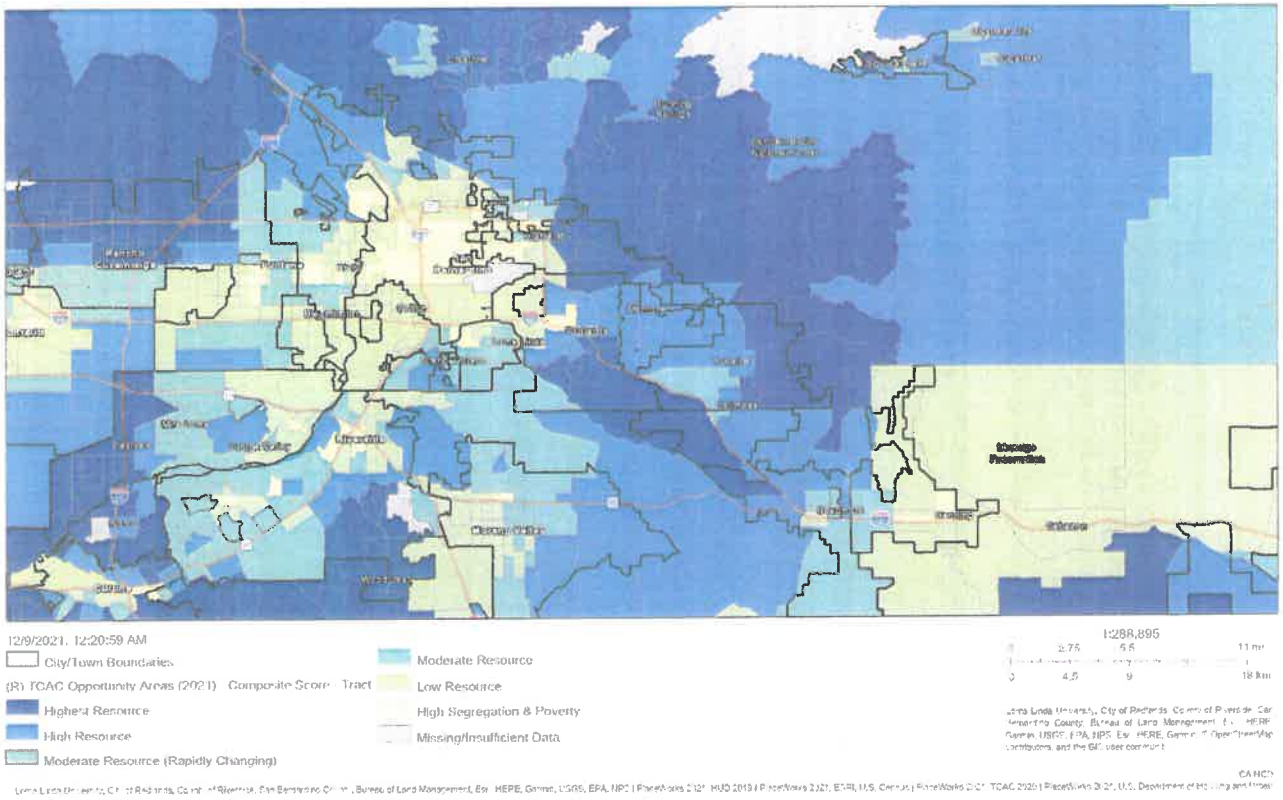


Figure 13B. Regional Opportunity Map[34]

[34] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.5.1. Access to Education

Access to quality education is one aspect of opportunity. The City is served by the Redlands Unified School District and the San Bernardino City Unified School District.[35] [36] The boundaries for the Redlands Unified School District encompasses the eastern portion of the City until City Creek. The San Bernardino City Unified School District encompasses the western portion of the City.

Redlands Unified School District encompasses 147 square miles and serves the communities of Redlands, Loma Linda, Mentone, Forest Falls, and portions of San Bernardino and the City. The Redlands Unified School District consists of 15 elementary schools, 4 middle schools, and 4 high schools. Current enrollment in grades K–12 is 21,333 students. The ethnicity of the student population is consistent with the City's population of various ethnic/racial backgrounds (31.6 percent White and 45 percent Hispanic). The district serves 1,965 English-language learners (9.2 percent). Thirty separate languages comprise the home languages of these students. The Redlands Unified School District reportedly ranks 8/10 in testing, ranking above the Statewide average in both math and reading proficiency, and spends $11,364 per student each year.

The San Bernardino City Unified School District consists of 50 elementary schools, 11 middle schools, and 10 high schools. Enrollment in K–12 is 53,037 students. According to the 2019/2020 district summary, there are 20.8 percent English-language learners, and 89.4 percent of students are considered socioeconomically disadvantaged. The student population is predominately Hispanic (77.7 percent). The San Bernardino City Unified School District offers dual immersion programs at several elementary schools, spends $12,604 annually per student, and provided 1,330 student-earned scholarship/grants in 2018/2019. The San Bernardino City Unified School District reportedly ranks 3/10 in testing and falls below the Statewide averages for both math and reading proficiency.

Table 1, California Assessment of Student Performance and Progress – Science (2018–2019), compares the standardized test scores for grades 5, 8, and high school in science by race/ethnicity for both districts.

Table 1: California Assessment of Student Performance and Progress – Science (2018–2019)

Student Group	Total Enrollment	Number Tested	Percent Tested	Percent Not Tested	Percent Met or Exceeded
San Bernardino City Unified School District					
All	11,725	11,405	97.27%	2.73%	19.32%
Black or African American	1,282	1,229	95.87%	4.13%	12.61%
American Indian or Alaska Native	45	44	97.78%	2.22%	13.64%
Asian	187	185	98.93%	1.07%	48.11%
Filipino	50	48	96.00%	4.00%	50.00%

[35] Redlands Unified School District. n.d. Schools Boundary Map. https://www.redlandsusd.net/Page/114.
[36] San Bernardino City Unified School District. 2021. School Boundaries. https://sbcusd.com/cms/One.aspx?portalId=59953&pageId=1341450.

Table 1: California Assessment of Student Performance and Progress – Science (2018–2019)

Student Group	Total Enrollment	Number Tested	Percent Tested	Percent Not Tested	Percent Met or Exceeded
Hispanic or Latino	9,180	8,947	97.46%	2.54%	18.18%
Native Hawaiian or Pacific Islander	48	48	100.00%	0.00%	18.75%
White	660	641	97.12%	2.88%	39.12%
Two or More Races	134	132	98.51%	1.49%	16.67%
Redlands Unified School District					
All	4,815	4,715	97.92%	2.08%	35.26%
Black or African American	302	292	96.69%	3.31%	19.18%
American Indian or Alaska Native	17	17	100.00%	0.00%	29.41%
Asian	450	443	98.44%	1.56%	64.11%
Filipino	117	117	100.00%	0.00%	47.86%
Hispanic or Latino	2,408	2,352	97.67%	2.33%	24.67%
Native Hawaiian or Pacific Islander	12	12	100.00%	0.00%	25.00%
White	1,270	1,245	98.03%	1.97%	46.14%
Two or More Races	230	228	99.13%	0.87%	43.86%
Statewide					
Statewide	1,563,993	1,477,006	94.44%	5.56%	29.93%
Black or African American	85,376	78,167	91.56%	8.44%	13.60%
American Indian or Alaska Native	8,234	7,486	90.92%	9.08%	21.16%
Asian	145,598	141,013	96.85%	3.15%	58.68%
Filipino	38,377	36,890	96.13%	3.87%	44.35%
Hispanic or Latino	845,305	802,572	94.94%	5.06%	18.80%
Native Hawaiian or Pacific Islander	7,338	6,870	93.62%	6.38%	21.01%
White	366,641	341,893	93.25%	6.75%	44.42%
Two or More Races	56,801	53,277	93.80%	6.20%	44.93%

Source: Department of Education. 2019. Local Educational Agency Accountability Report Card. https://www.cde.ca.gov/ta/ac/le/.

As shown in Table 1, the San Bernardino City Unified School District overall tested lower in science by about 15 percent compared to the Redlands Unified School District and 10 percent compared to the State. This trend was similar by race/ethnicity as well. Based on information published from the Department of Education, the graduation rate for Redlands Unified School District was 92.08 percent compared to 83.35 percent for San Bernardino City Unified School District.

Figure 14A, Opportunity for Education, shows the access to opportunity for education, which displays high levels of opportunity in eastern Highland, and less positive outcomes in western Highland. These differences follow school district lines, with the Redlands Unified School District Census tracts scoring higher than the San Bernardino Unified School District tracts. Furthermore, **Figure 14B**, Opportunity for Education in the Region, displays a large area of Fontana to San Bernardino as having less positive education outcomes. More positive education outcomes correspond to higher White populations as identified in **Figure 1B**.

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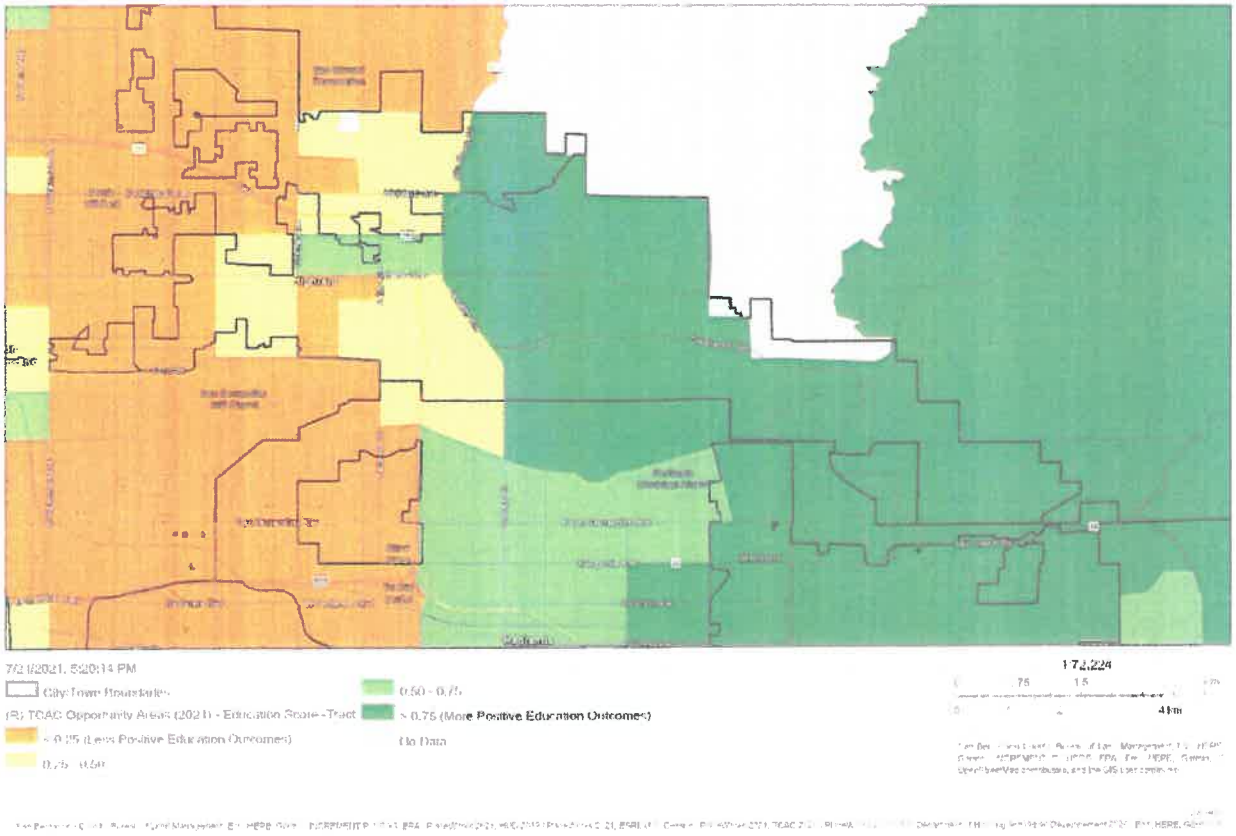


Figure 14A. Opportunity for Education[37]

[37] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

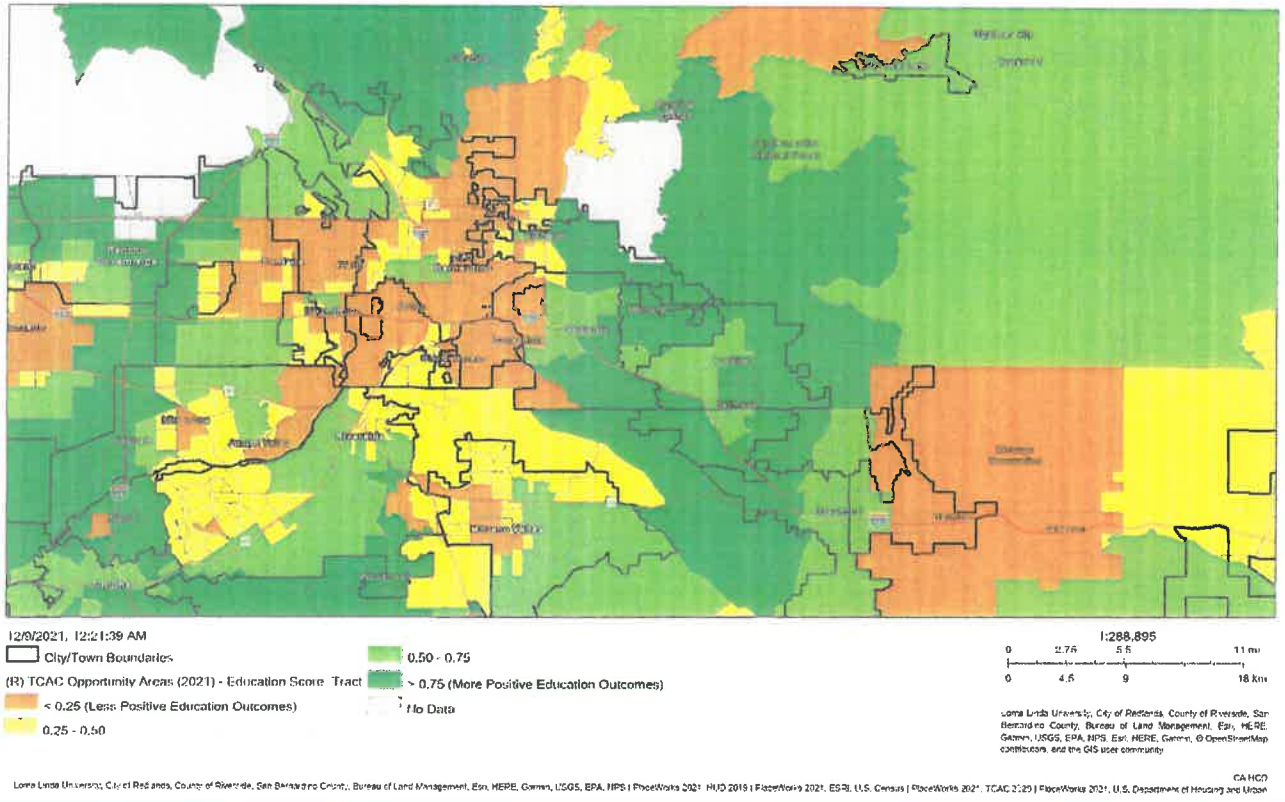


Figure 14B. Opportunity for Education in the Region[38]

[38] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.5.2. Access to Economic Opportunity

Figure 15A, Economic Outcomes, shows access to economic opportunity. Less positive economic outcomes are in western Highland. In fact, the least positive economic outcomes are centered in San Bernardino and adjacent communities when looking at the regional map of **Figure 15B**, Economic Outcomes in the Region. **Figure 16A**, Jobs Proximity Index, measures the physical distances between residents and jobs, by geography. As shown in **Figure 16A**, the portion of the City in closest proximity to the City of San Bernardino, to the west, had the highest jobs proximity index. The uses to the west and southwest of the City, near the San Bernardino International Airport, are predominately industrial. Due to the low job proximity in East Highland, the East Highland residents are more likely to commute via vehicle, traveling longer distances. The cost of owning a vehicle can be a financial burden for many lower-income households, and long commutes can be even more burdensome due to the expense of fuel consumption and vehicle repairs associated with increased use. **Figure 16B**, Regional Jobs Proximity Index shows that least positive economic outcomes do not correlate to low job proximity and that San Bernardino is the closest job hub for City residents. Like many outer suburbs in the region, most City residents do not work where they live.

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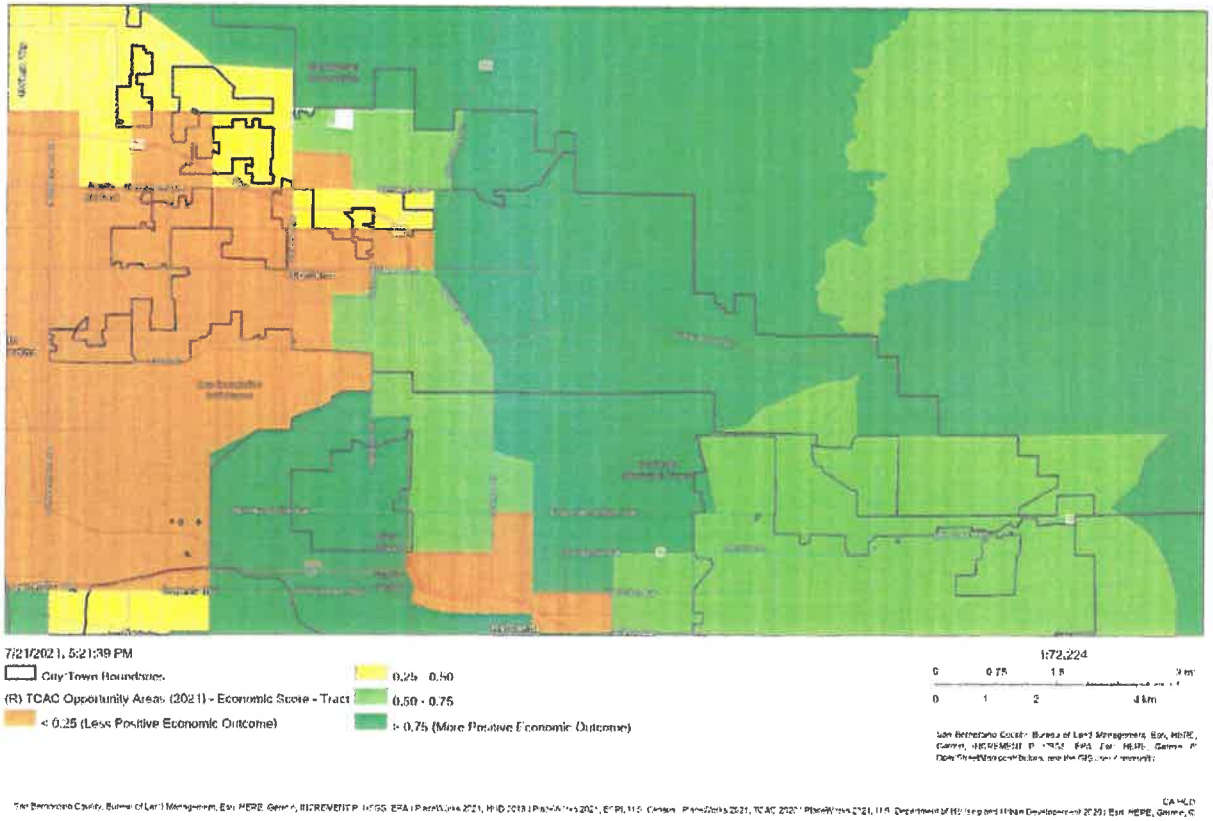


Figure 15A. Economic Outcomes[39]

[39] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

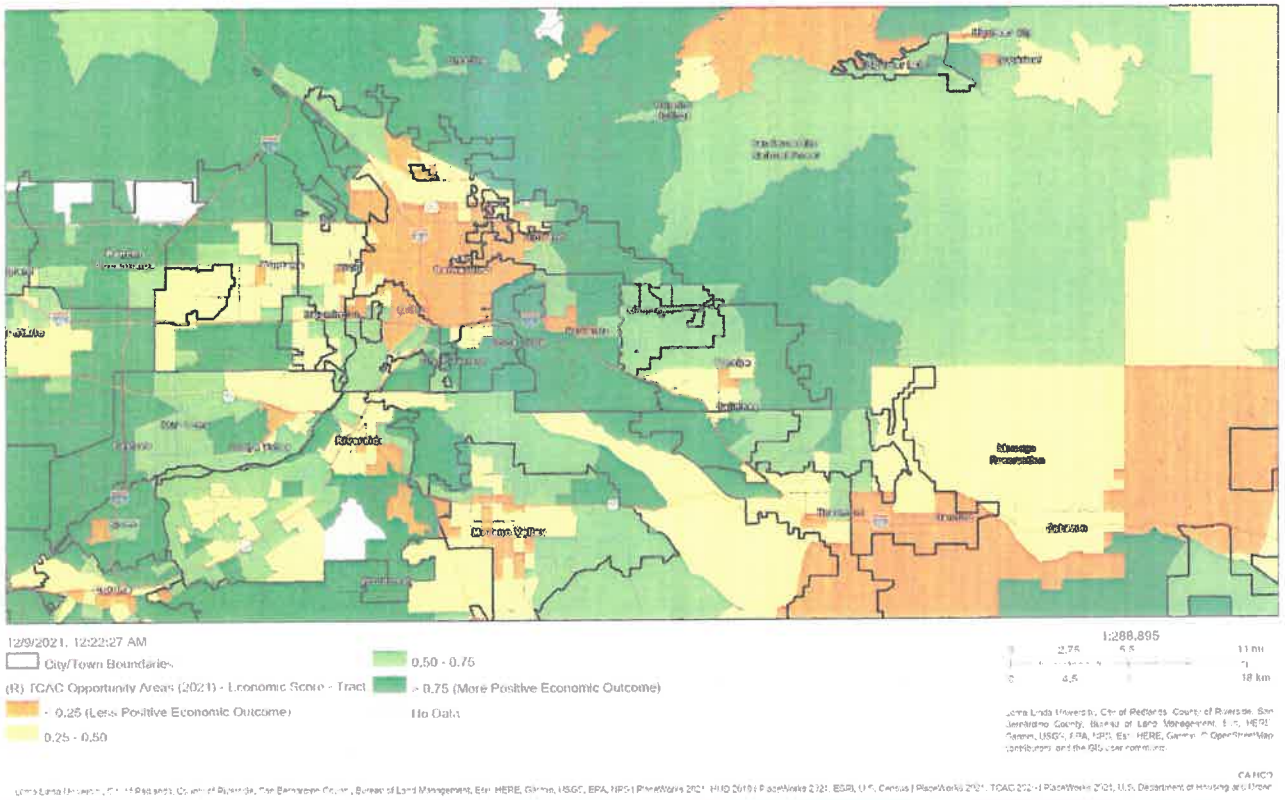


Figure 15B. Economic Outcomes in the Region[40]

[40] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

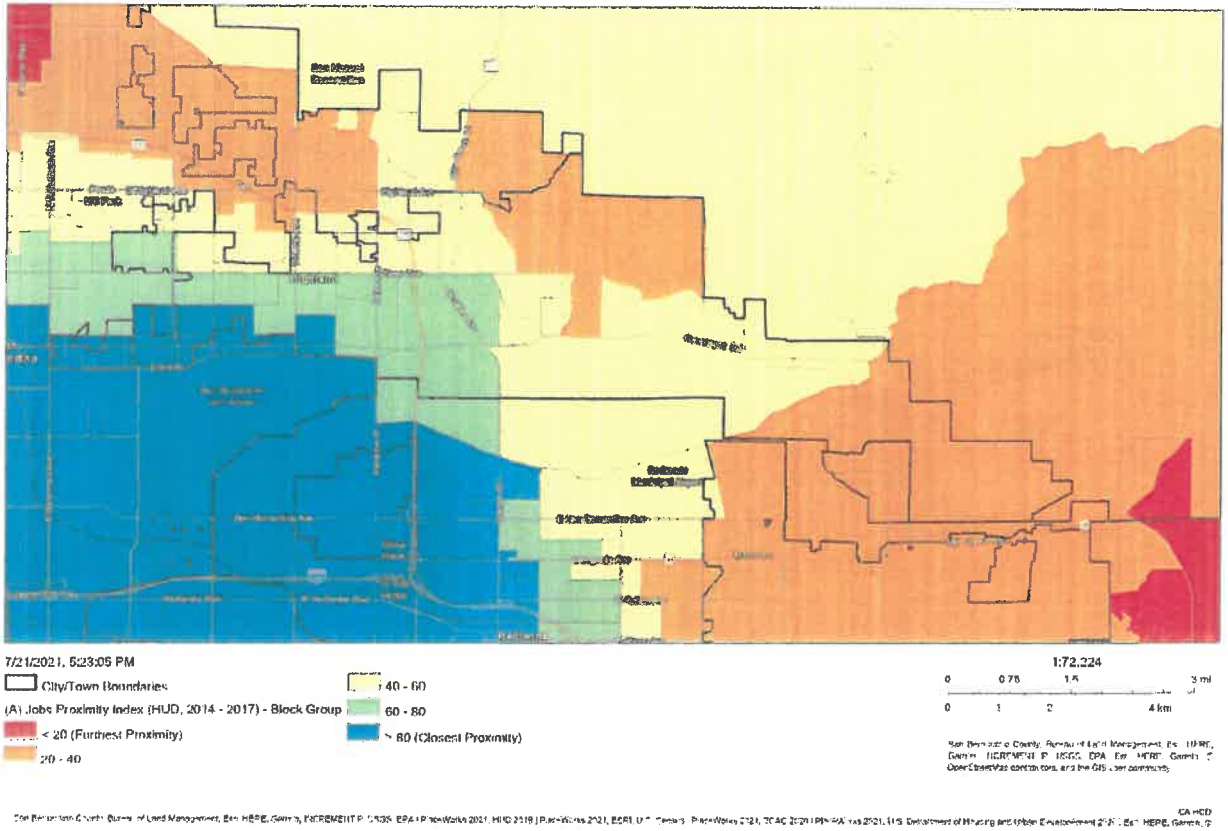


Figure 16A. Jobs Proximity Index[41]

[41] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

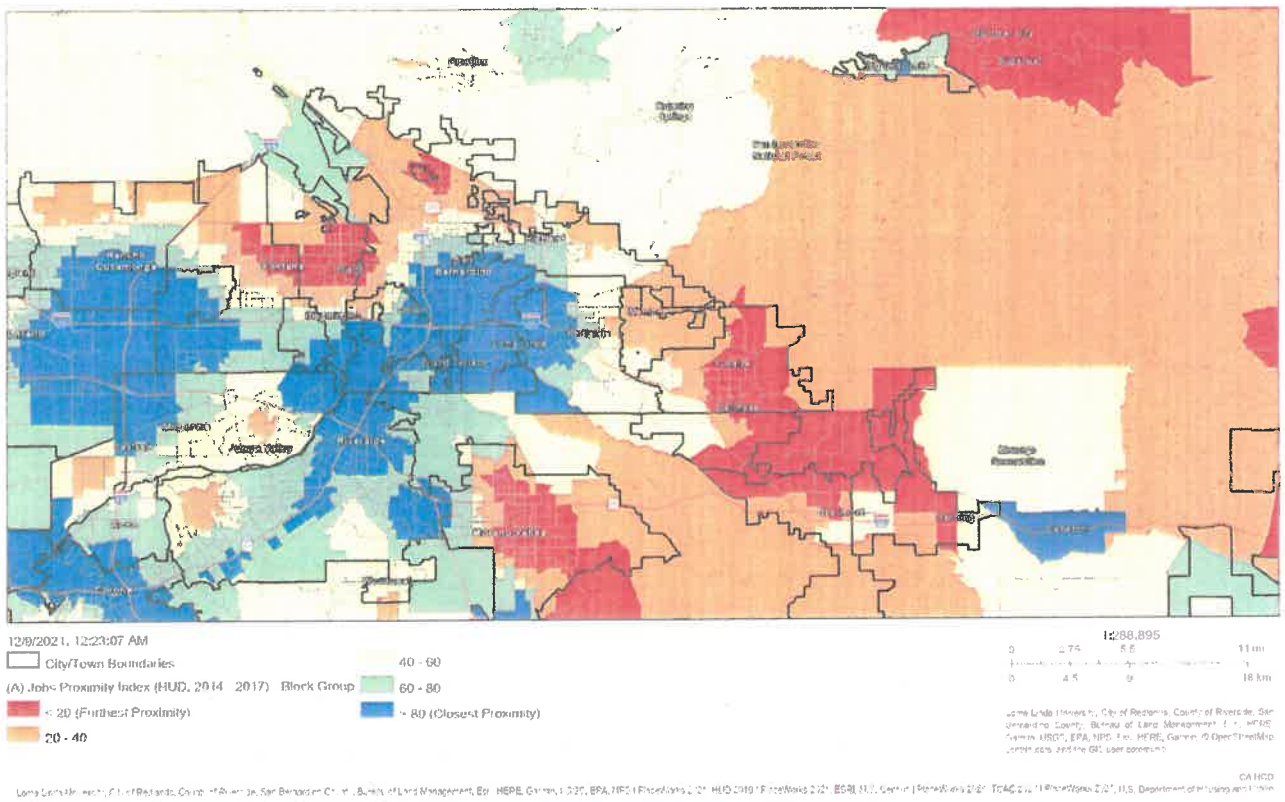


Figure 16B. Regional Job Proximity Index[42]

[42] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.5.3. Access to Transportation

Access to transportation opportunities is important, especially for lower-income earning households who may not be able to afford a car. In more rural, suburban, or isolated areas, access to a car may be higher due to necessity and lack of transit opportunities. The rates of automobile ownership can be seen in **Figure 17**, Automobile Ownership Rates. They are higher in eastern Highland, which consists of higher-income households, primarily White households, and farther proximity to employment. Western Highland has lower rates of automobile ownership, which makes sense given the higher concentrations of poverty and lower incomes. Communities with low automobile ownership rates can be benefitted by access to public transit and walkable communities. **Figure 18**, Access to Transit, shows that western Highland is well served by bus stops, with nearly the entire area within walking distance to a transit stop. Eastern Highland, with higher average household incomes and more a suburban setting, is not within walking or biking distance of transit stops. Major transit stops run along Baseline Street, East 9th Street, Palm Avenue, and Church Street. Although western Highland has increased job proximity and transit access as compared to eastern Highland, the specific quality and pay rates associated with the most accessible jobs is unclear.

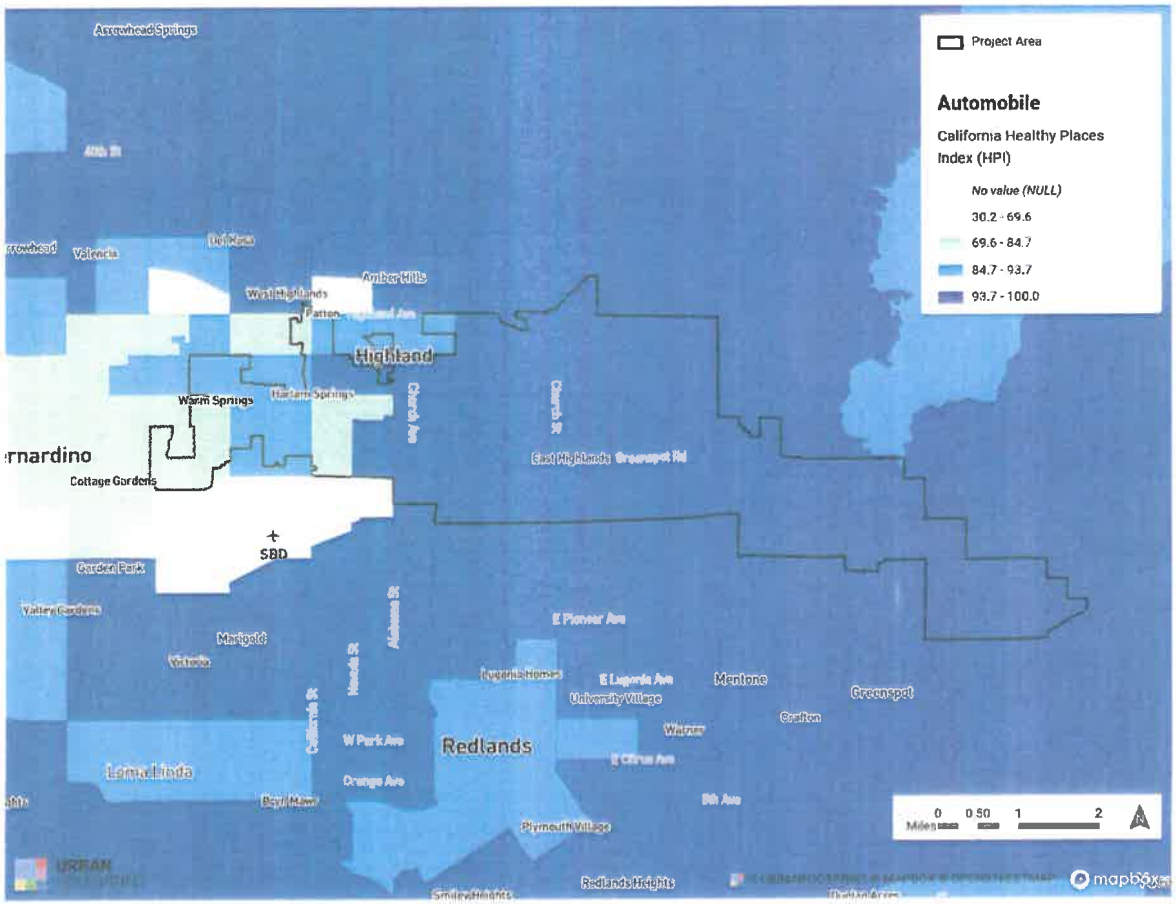


Figure 17. Automobile Ownership Rates

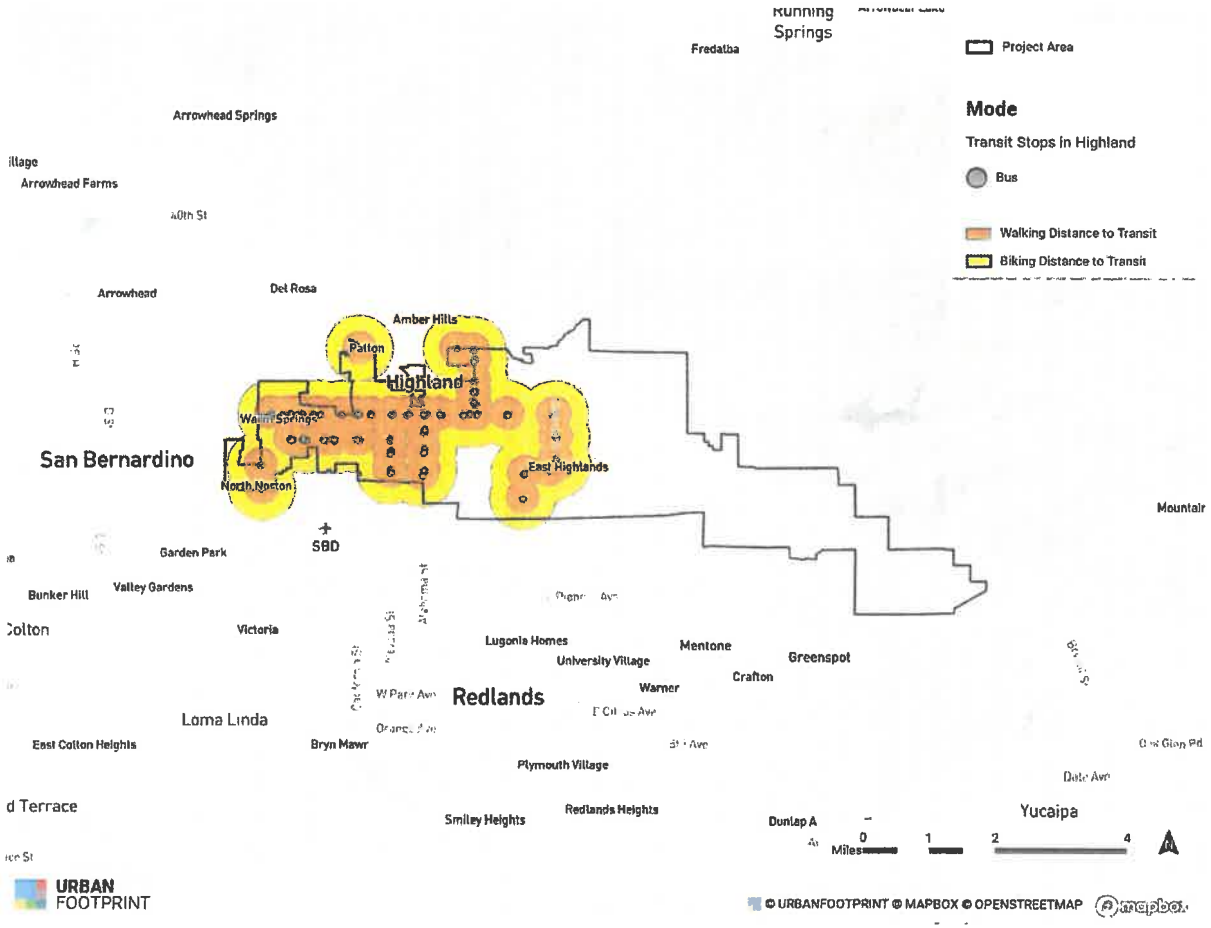


Figure 18. Access to Transit

4.5.4. Access to a Healthy Environment

Access to a clean and healthy environment is an important part of physical and mental health, as well as overall quality of life for residents. Levels of air pollution, water quality, access to open spaces, vegetation, and more contribute to environmental factors that go into different indexes that attempt to distinguish levels of environmental quality. **Figure 19**A, ~~Environmental Outcomes~~Opportunity for a Healthy Environment, shows environmental outcomes. This figure demonstrates that much of the City has relatively positive environmental outcomes, where the farthest southwestern portion of the City, the south-central portion of the City, and a sliver of the northeastern portion of the City have the lowest scores with less than positive environmental outcomes. Moderately positive outcomes are in the eastern and western most portions of the City. Figure 19B, Opportunity for a Healthy Environment in the Region shows that the City has more positive environmental outcomes when compared to the region, and that the City is actually flanked by areas of less positive environmental outcomes to the southwest and northeast.

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Pollution burden is another aspect of environmental quality and can be visualized using CalEnviroScreen. Displayed in **Figure 20**A, CalEnviroScreen is a mapping tool that identifies the most affected areas by sources of pollution using environmental, health, and socioeconomic information to produce scores for every Census tract in the State. Areas with high scores experience a much higher pollution burden than areas with low scores. To the west of Boulder Avenue and south of Baseline Street, the pollution burden is in the 60th–90th percentile compared to the State of California. The highest pollution burden is the tract that is along the north/south portion of Interstate 210. Some specific pollution factors that are especially poor in some of the more pollution burdened areas in the City include ozone, particulate matter of 2.5 microns or less ($PM_{2.5}$), and hazardous waste exposure. Figure 20B, Regional CalEnviroScreen illustrates the City as being on the border of a concentration of high scores indicating pollution that is present in other major cities in the Inland Empire.

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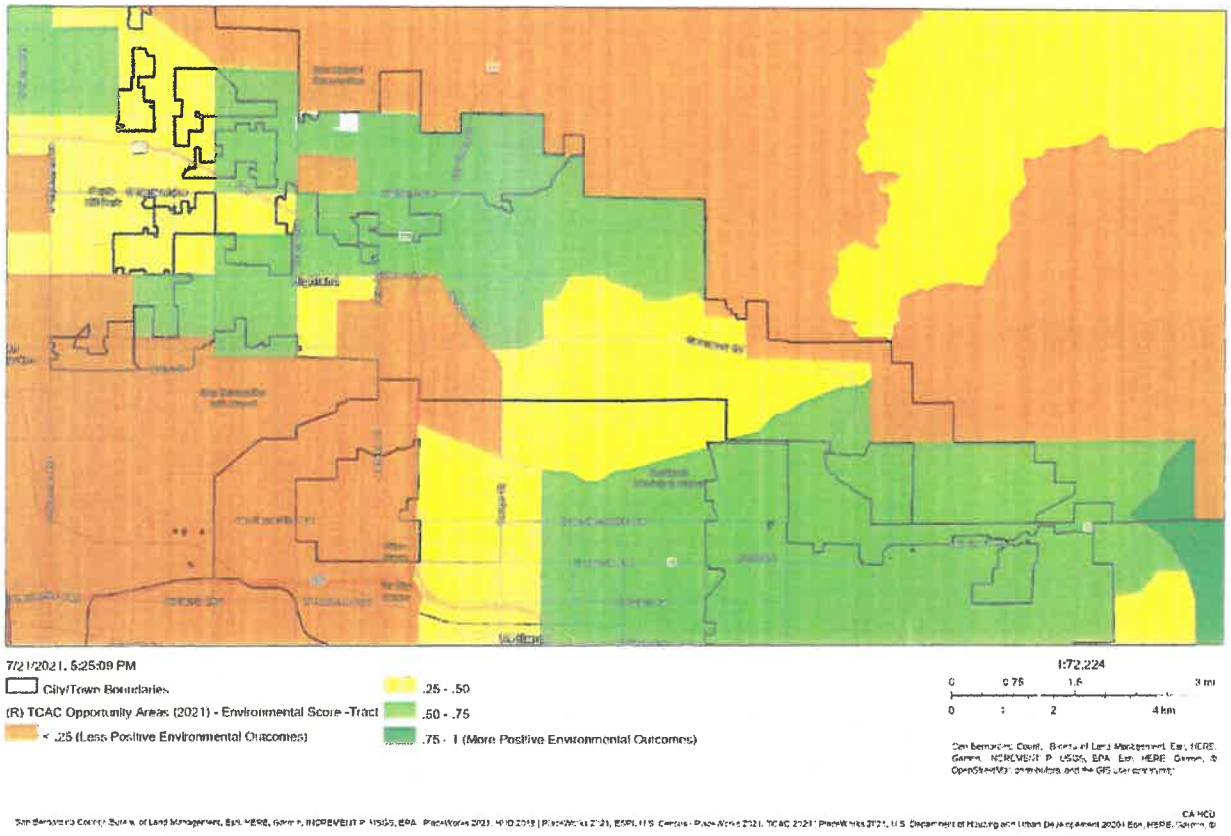


Figure 19A. Opportunity for a Healthy Environment[43]

[43]HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

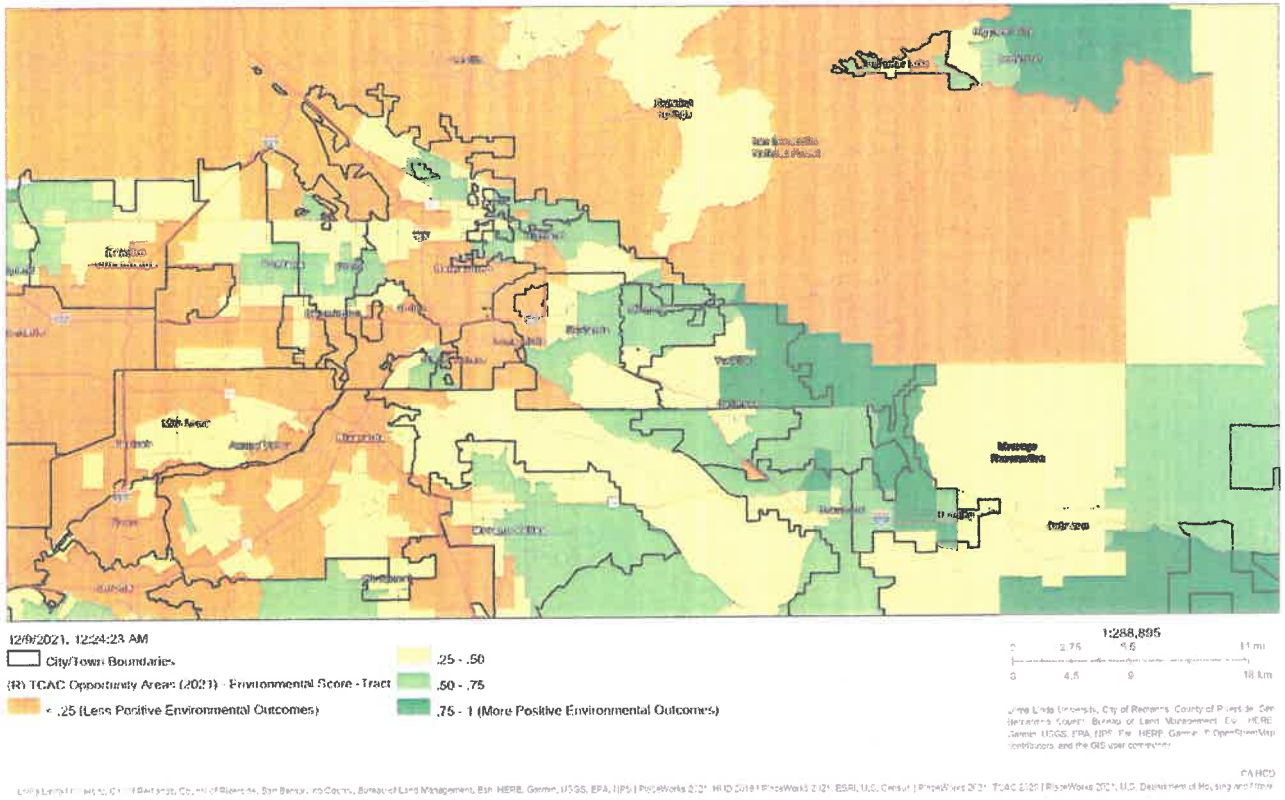


Figure 19B. Opportunity for a Healthy Environment in the Region[44]

[44] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

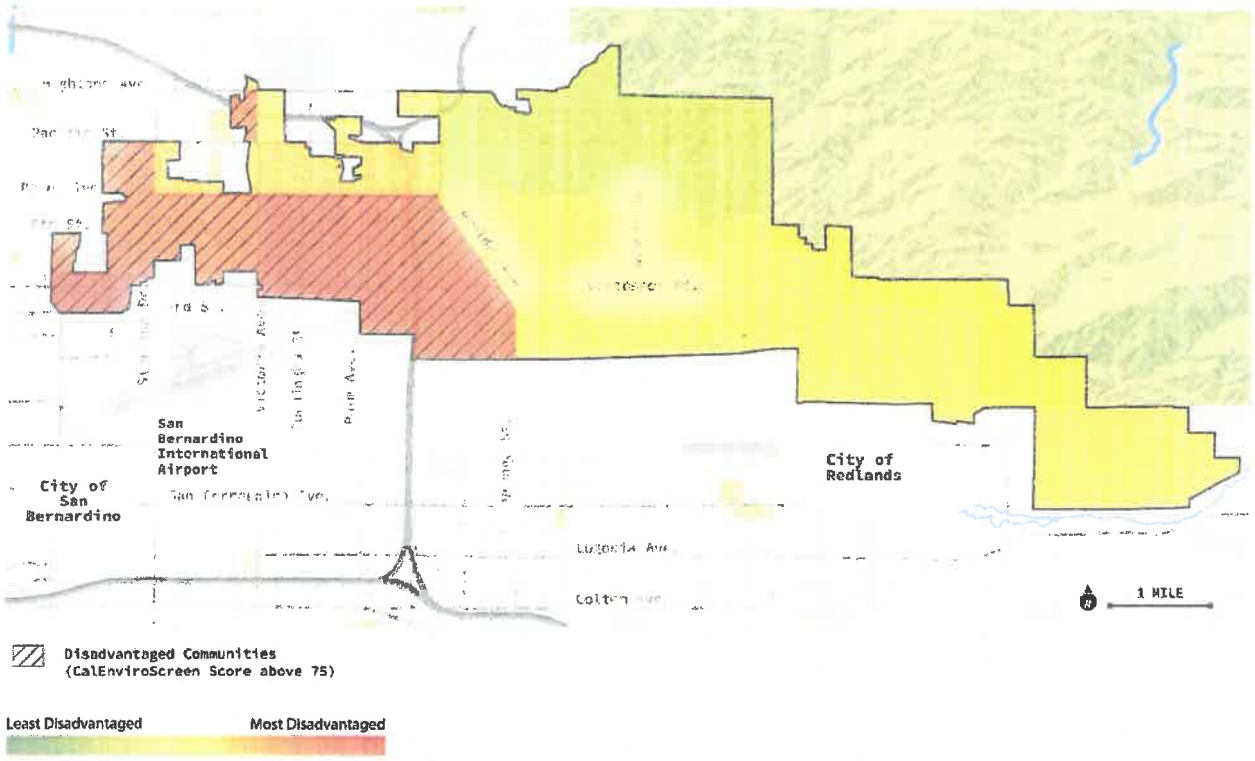


Figure 20A. CalEnviroScreen 3.0[45]

[45] OEHHA (Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30.

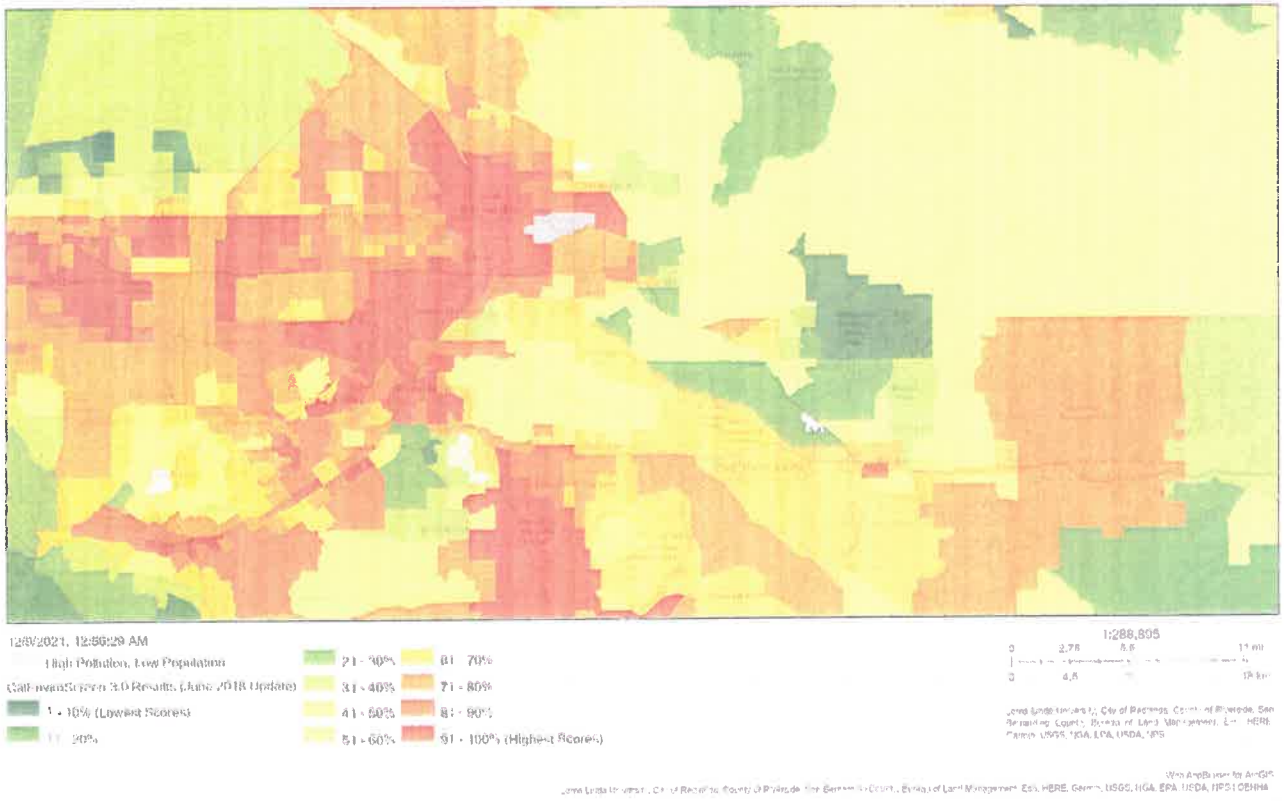


Figure 20B. Regional CalEnviroScreen 3.0[46]

[46] OEHHA (Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30.

The Healthy Places Index uses data that impacts personal health and compiles it to show where the healthiest and least healthy places are to live. In the City, the least healthy environment is again found in the western portion of town, for the most part to the west of Victoria Avenue. Some concerning health indicators include high levels of asthma, diabetes, poor mental health, and low infant birth weight. Life expectancy at birth is one of the easiest to understand and starkest indicators of quality of life and healthy living. All of Highland west of Boulder Avenue is in the bottom 25th percentile for the State of California for life expectancy at birth, at less than 77 years. **Figure 21A**, Healthy Places Index, shows the Healthy Places Index scores for the City. As with previous maps, **Figure 21B**, Regional Healthy Place Index shows San Bernardino as having the less favorable score, explaining why western Highland falls into the same category.

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The presence and quality of parks and open spaces are other factors that are considered when determining if an environment is healthy or not. **Figure 22**, Parks, displays parks in the City and schools that have park areas that are opened for public use during hours that the school is not in operation. Parks are least prevalent in the eastern and northern portions of the City. While it may be farther from conventional City parks, the northeastern portion of the City has much closer access to open space just outside City limits. The City relies on the school parks to provide adequate park space for residents.

Further, improvement to the environmental health of neighborhoods requires multiple levels of efforts, including land use planning, transportation considerations, urban forest management, healthy food options, park investments, and more.

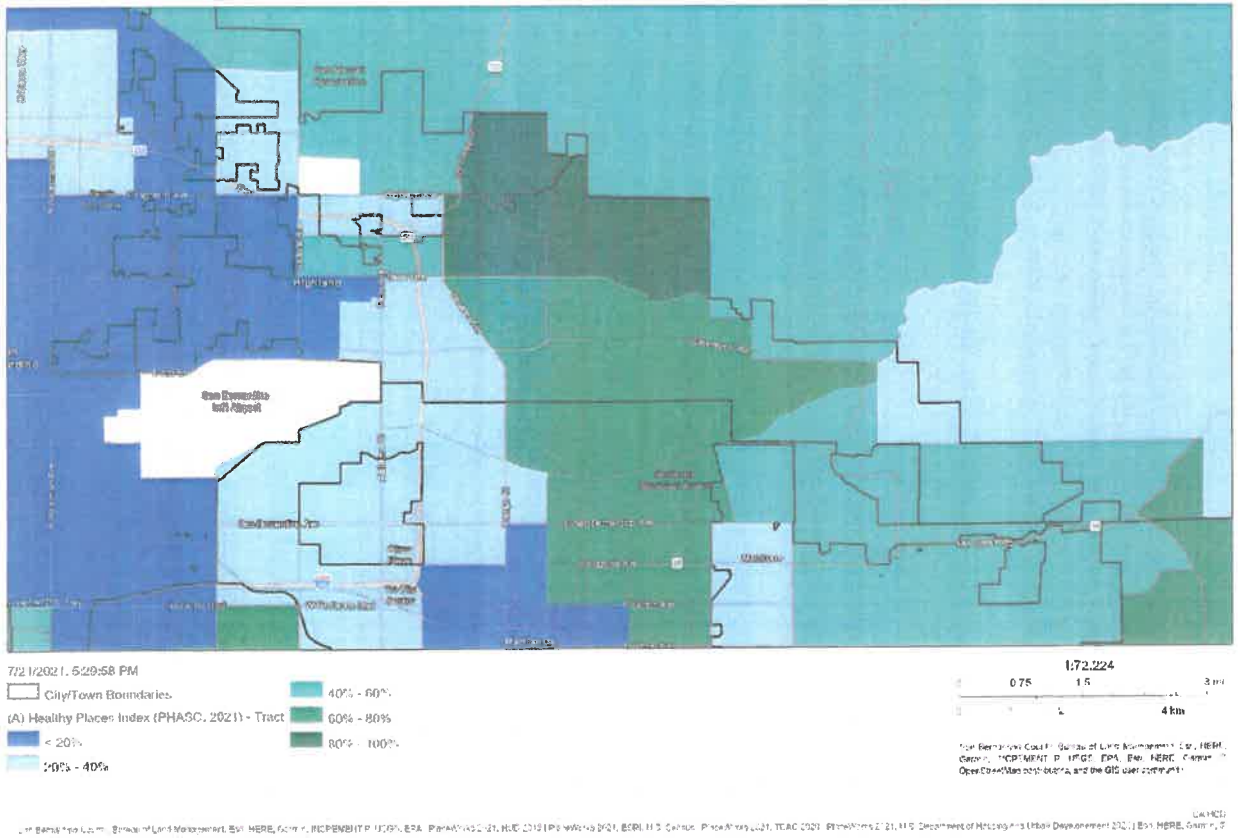


Figure 21A. Healthy Places Index[47]

[47] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

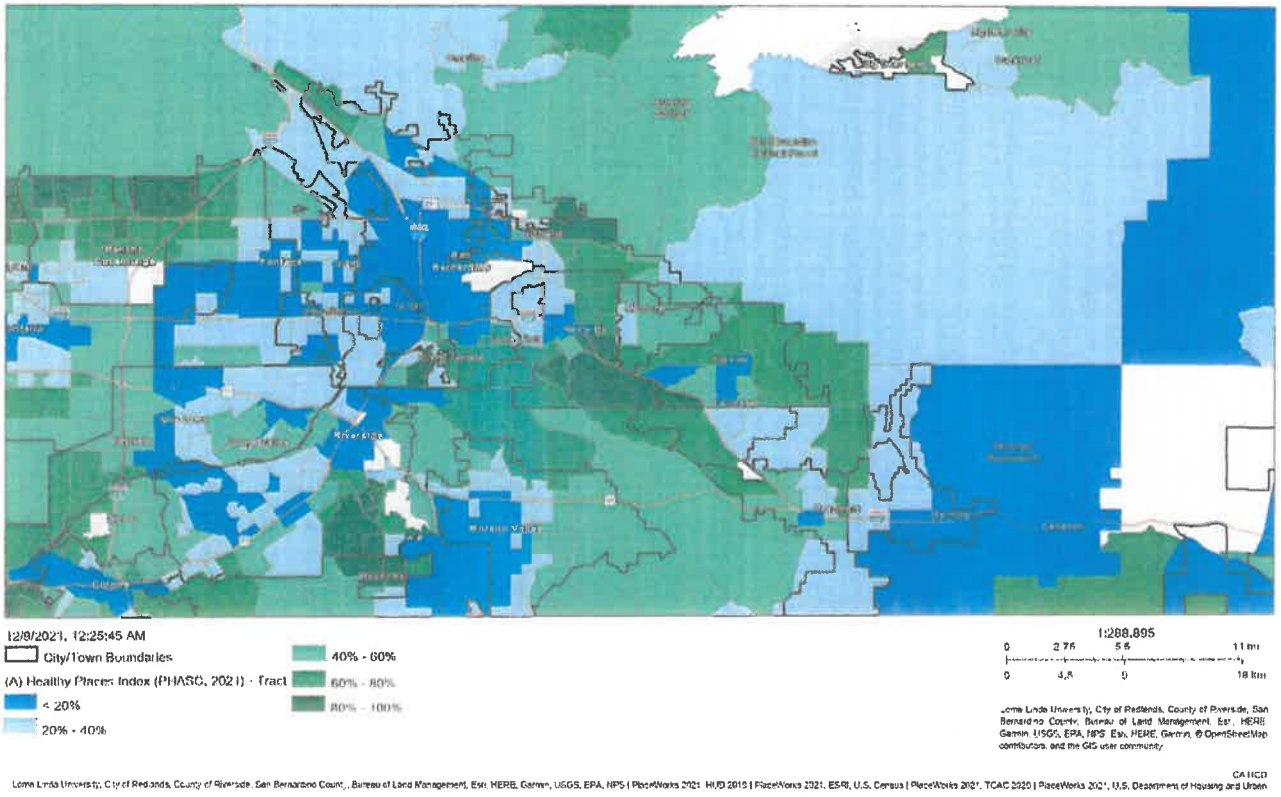


Figure 21B. Regional Healthy Places Index[48]

[48] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

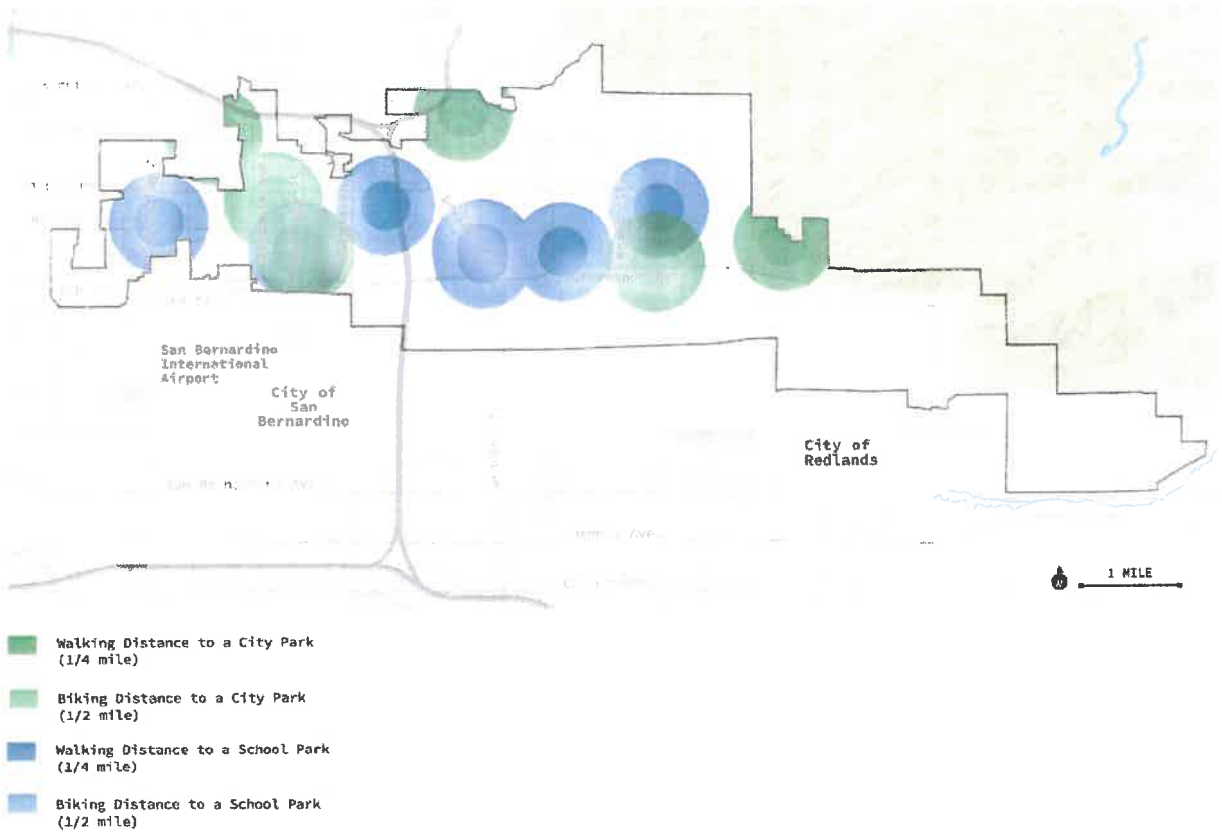


Figure 22. Parks[49]

[49] City of Highland. 2020.

4.5.5. Access to Opportunity for Persons with Disabilities

Trends related to persons with disabilities, including local and State analysis of prevalence of disabilities by type and age group, are included in **Appendix B, Community Profile**. Some common regulatory barriers that can exist for persons with disabilities include the following:

- Reasonable Accommodation Procedure
  - Common issues with reasonable accommodation procedures include excessive findings of approval, burden on applicants to prove the need for exception, application costs, and discretionary approvals.
- Family Definition
  - Family definitions in zoning or other land use related documents can directly impact housing choices for persons with disabilities, particularly regarding group home situations, which are commonly used by persons with disabilities. Regulating the number of people or requiring occupants to be related can be common elements in family definitions that create barriers.
- Excluding Group Homes
  - Excluding group homes or subjecting these homes to a Conditional Use Permit in single-family zones acts as a barrier to housing choice for persons with disabilities.
- Spacing Requirements
  - Excessive spacing requirements between group homes or community or residential care facilities can directly impact the supply of housing choices for persons with disabilities.
- Unit Types and Sizes
  - The lack of multifamily housing or zoned capacity for multifamily and a variety of sizes, from efficiency to four or more bedrooms, can constrain the ability of persons with disabilities to live in a more integrated community setting.
- Lack of By-Right Zoning for Supportive Housing
  - By-right zoning for supportive housing can result in more objective processes that are less likely to discriminate or have the effect of discriminating against persons with disabilities.[50]

Some of the overarching goals and specific policies within the Housing Element encourage equal access to housing and services to meet the needs of persons with disabilities, including the following:

- Policy 5.1, to provide the regulatory framework necessary to facilitate housing for those with special needs.
- Policy 5.2, to encourage development of accessible housing for levels of ability through regulatory relief.
- Policy 5.4, to support innovative public private, and nonprofit efforts in the development and financing of affordable, special needs housing.

The City has multiple transitional housing homes currently. Two are six-bed facilities, and one of them is reserved for adults ages 18 through 26, while the other is for any unhoused person. The City does not

[50] HCD. 2021. *Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements*. April 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

have permanent supportive housing stock within the City limits; however, permanent supportive housing is available in adjacent cities. The San Bernardino Department of Behavioral Health Homeless Program provides supportive housing and counseling services for mentally ill persons and are located in the City of San Bernardino. The City has within its Municipal Code definitions and regulations regarding emergency shelters, transitional housing, and permanent supportive housing.

In an effort to prevent and combat homelessness, the City and its partners are also currently participating in the following activities:

- The Community Development Department provides information and referrals to Housing Choice Vouchers for individuals and families experiencing homelessness.
- The Department of Public Works conducts cleanups for City-owned land and in the public right-of-way Citywide.
- Outreach and engagement through the Sheriff's Department, including the County San Bernardino's HOPE Team.
- The Code Enforcement Division responds to homelessness-related complaints regarding private property.
- The Highland Library, Community Center, YMCA, and Senior Center in Highland provide air-conditioned rest areas in dangerously hot weather.
- Saint Adelaide Catholic Church provides emergency food provisions, employment assistance, and marriage counseling.
- The Community Action Partnership of San Bernardino County conducts countywide housing needs assessment. This effort trains and uses homeless service providers, former persons experiencing homelessness, and current persons experiencing homelessness to collect data.
- Vista Guidance Centers of Highland offers psychiatric evaluations, counseling, and referral services.

Programs 19 and 28 of the Housing Element implement strategies to provide support for those experiencing homelessness through emergency shelters, transitional housing, permanent supportive housing, and Low-Barrier Navigation Centers.

4.6. Disproportionate Housing Needs and Displacement Risk

Homeownership is the largest asset of most households in the United States, and, for many households, provides increased opportunity for future generations through increased family wealth. With increased family wealth, younger generations are often afforded increased educational opportunities, higher employment attainment, and access to inheritance. One of the most prevalent consequences of residential segregation is the intergenerational inaccessibility of homeownership. According to the Census, a total of 10,796 occupied units (66.9 percent) in the City were owner-occupied in 2019, while 5,342 units (33.1 percent) were renter-occupied. The rate of owner-occupied units in the City increased by 3.6 percent from 2014 to 2019, while the rate of owner-occupied units in the County decreased by 1.1 percent.[51] The area with the highest percentage of owner-occupied units coincides with the areas that predominantly consist of White residents, have a higher percentage of married-couple households, have

[51] U.S. Census Bureau. 2019. Comparative Housing Characteristics. 2019 ACS 5-Year Estimates. Table CP04.

higher incomes, have increased access to vehicles, and have a lower percentage of persons with disabilities.

4.6.1. Housing Affordability

Housing affordability depends on a number of factors in the housing market, economy, and community. Affordability can be broken up into how affordable it is to rent and how affordable it is to be a homeowner. **Table 2**, Household Tenure, identifies the owner and renter rates within the City, showing that homeownership is more prevalent than renting. However, homeownership rates decreased from 2010 to 2019. During the 1990s, owner-occupancy rates in the City increased as more single-family homes were built. This development trend resulted in a relatively high percentage of owner-occupied units. Overall, the number of renter-occupied units in the City increased by almost 900 between 2010 and 2018; however, the share of renters in the City is lower than in the Southern California Association of Governments region overall, with 47.5 percent renters. As shown in **Figure 23A**, renters are primarily located in western Highland. Central and eastern Highland are primarily occupied by homeowners. As evident by the regional map, **Figure 23B**, suggests that renters are more common in city cores.

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Table 2: Household Tenure

Tenure	2010*		2019**	
	Number	Percent	Number	Percent
Owner-Occupied	10,014	68.2	10,797	66.9
Renter-Occupied	4,675	31.8	5,341	33.1
Total	**14,689**	**100**	**16,138**	**100**

* US Census Bureau. 2010. Selected Housing Characteristics. 2010 ACS 5-Year Estimates Data Profiles. Table DP04.

** US Census Bureau. 2019. Selected Housing Characteristics. 2019 ACS 5-Year Estimates Data Profiles. Table DP04.

According to the Federal government, households are considered to be burdened by their housing costs when more than 30 percent of their income is spent on total housing costs, including utilities. In 2019, 62 percent of all renters were cost burdened by their housing. This renter cost burden can be seen in **Figure 24A**, Renter Cost Burden, with high levels in western Highland as well as south-central Highland, coinciding with the concentrations of renters and lower incomes. The City Community Development Department works with the Housing Authority to assist those residents with a rental cost burden by providing public assistance or Housing Choice Vouchers. In 2019, 35 percent of all homeowners were burdened by their housing costs. **Figure 24B**, Renter Cost Burden in the Region reveals that overpayment by renters is common at more than 40 percent throughout the region. **Figure 25A**, Homeowner Cost Burden, displays the homeowner cost burden, which is most dramatic in western Highland, although much of the City's households are burdened by their housing costs.[52] **Figure 25B**, Homeowner Cost Burden in the Region illustrates that homeowner cost burden is greater in urban and rural areas, while the suburban middle falls less than 40 percent.

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[52] U.S. Census Bureau. 2019. Selected Housing Characteristics. 2019 ACS 5-Year Estimates Data Profiles. Table DP04.

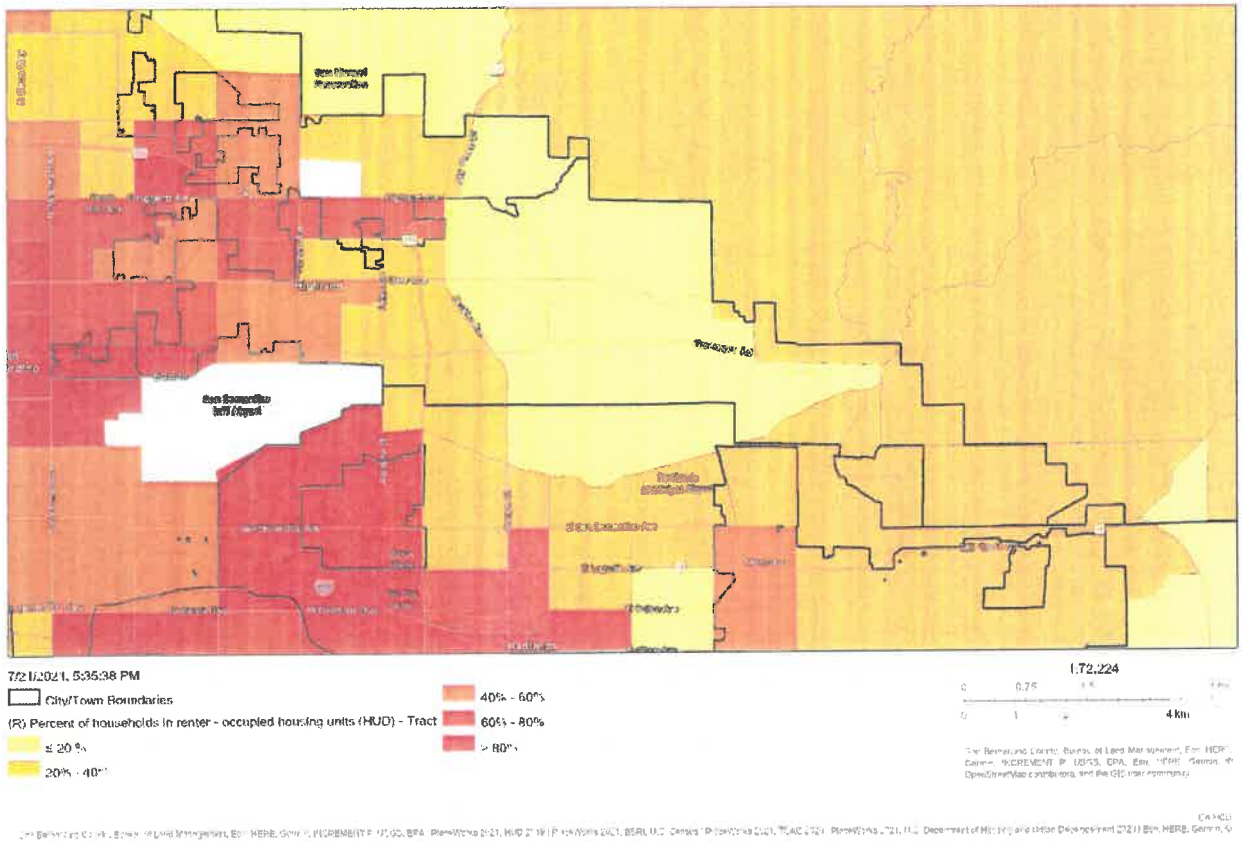


Figure 23A. Percent of Renter-Occupied Housing Units[53]

[53] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

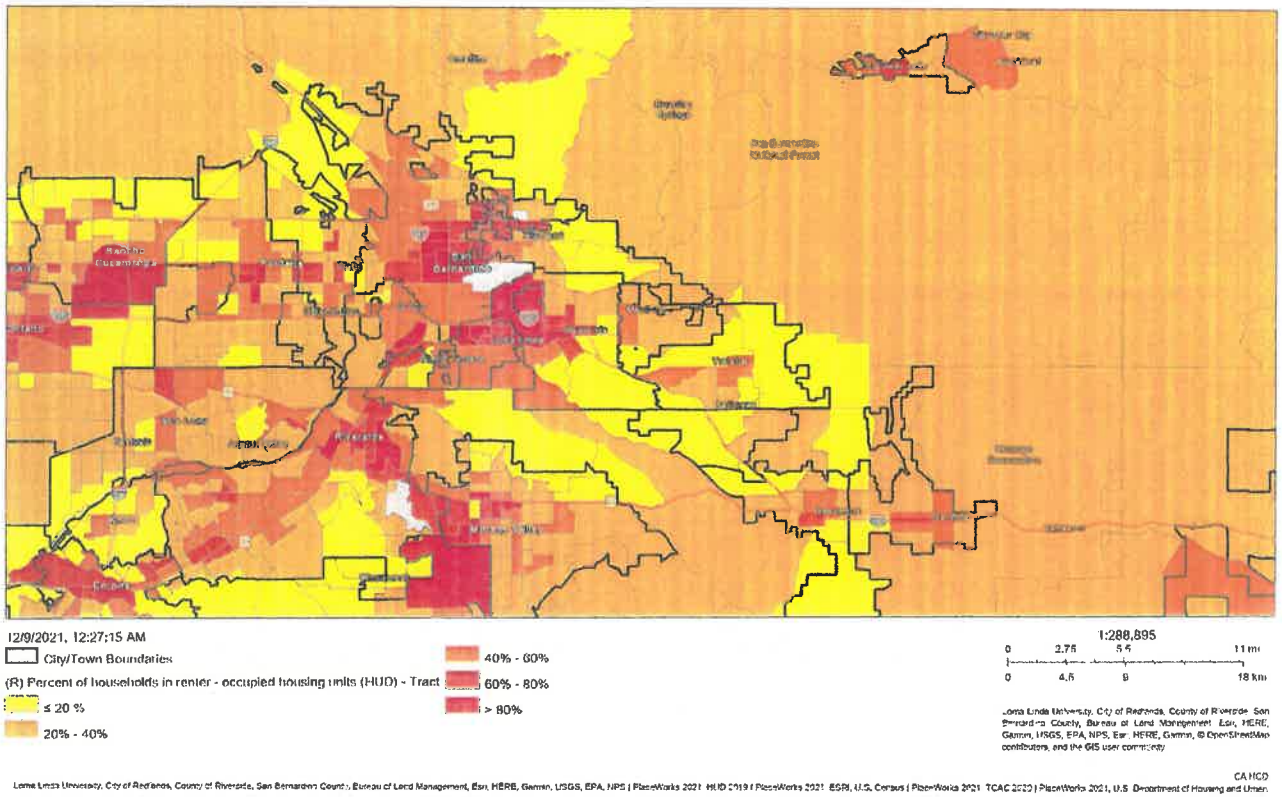


Figure 23B. Percent of Renter-Occupied Housing Units in the Region[54]

[54] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

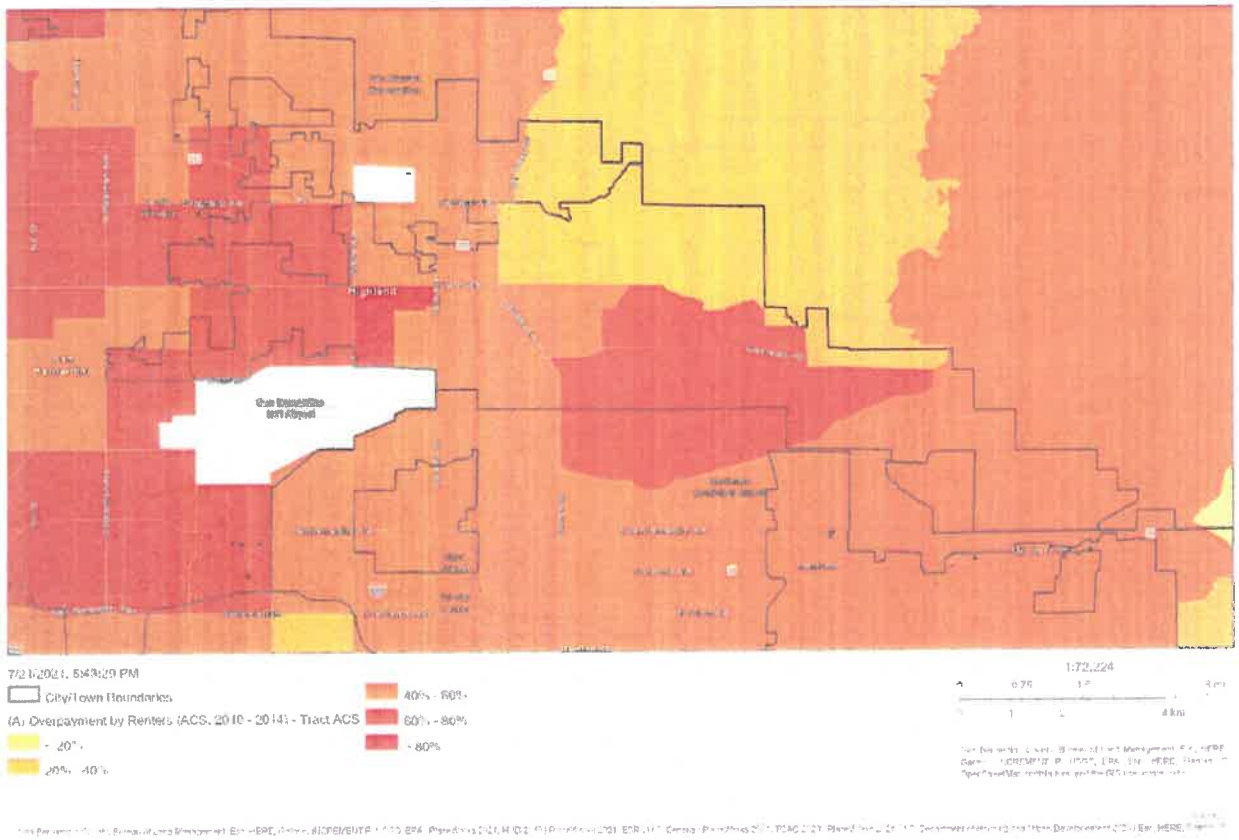


Figure 24A. Renter Cost Burden[55]

[55] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

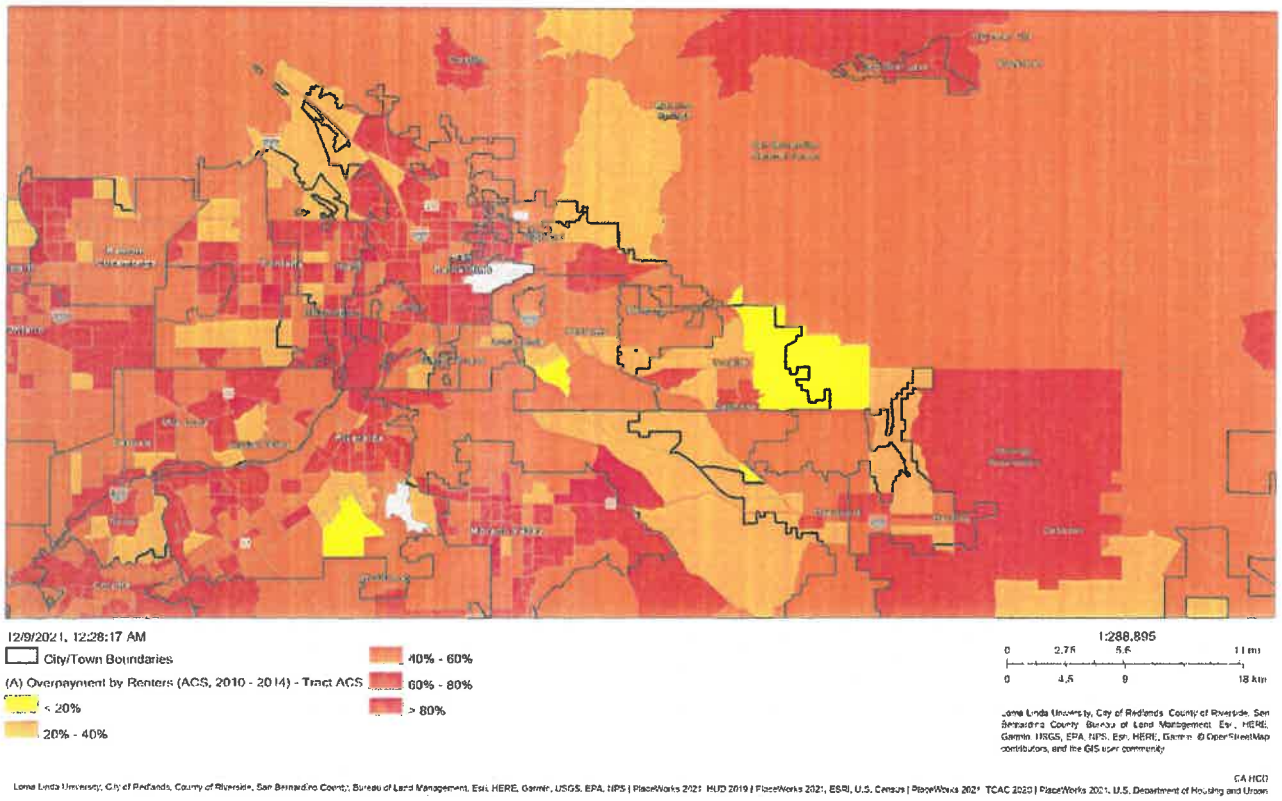


Figure 24B. Renter Cost Burden in the Region[56]

[56] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

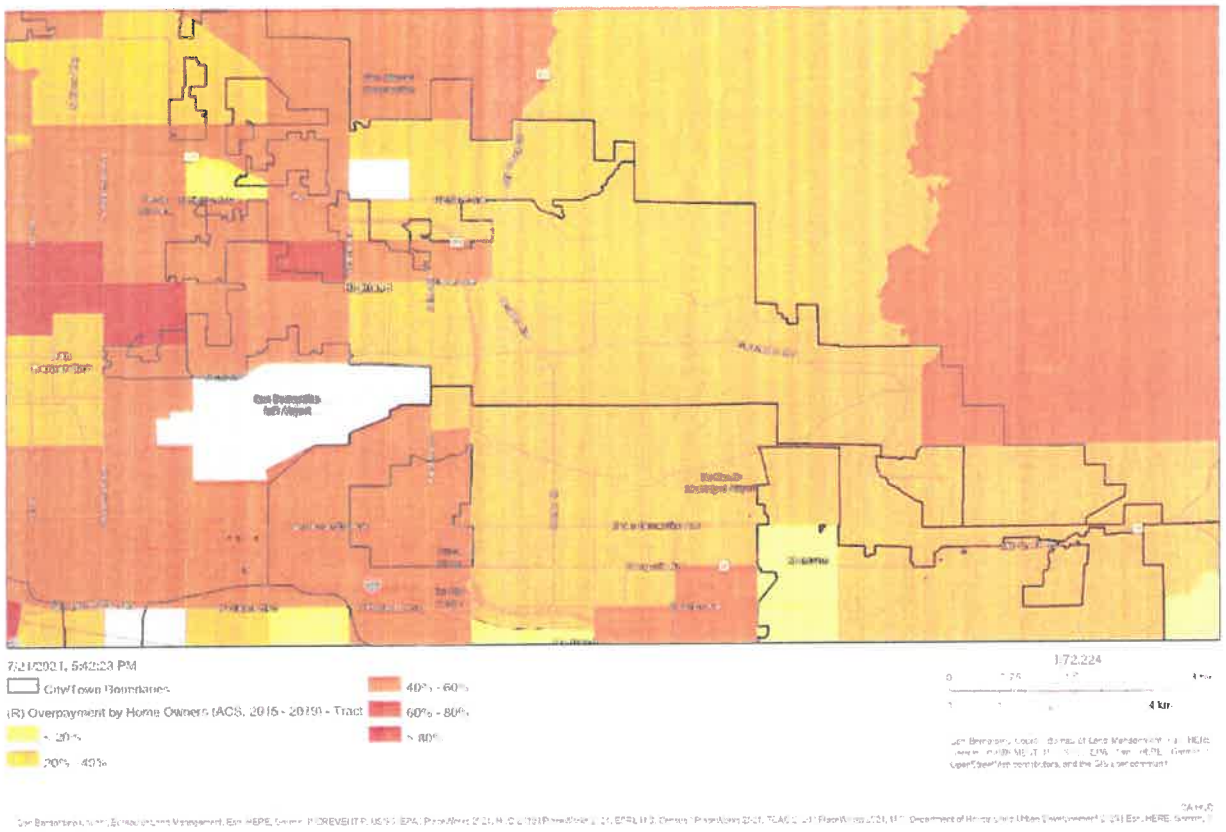


Figure 25A. Homeowner Cost Burden[57]

[57] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

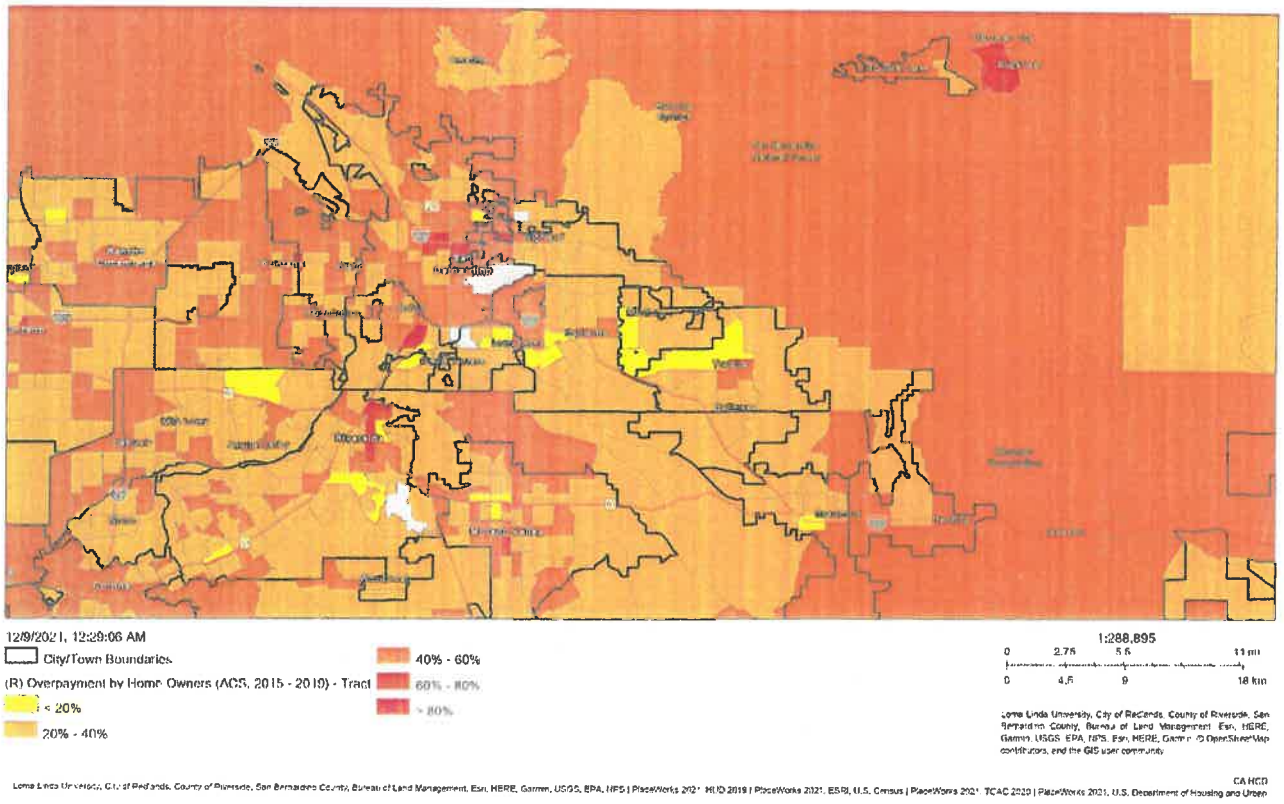


Figure 25B. Homeowner Cost Burden in the Region[58]

[58] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.6.2. Housing Conditions

The quality of housing is dependent on more than just homeownership and requires residents and property owners to be diligent and able to fix or afford to fix issues as they come up. There are four housing problems that are considered severe: lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and monthly housing costs exceeding 30 percent of monthly income. **Table 3** shows an overview of households with any one of the four severe housing problems by housing tenure. This table shows that renters disproportionately have any one of the four severe housing problems compared to homeowners. **Figure 26A**, Any Four Housing Severe Problems, displays this data for the entirety of the City, where any one of the severe housing problems impacts 26 percent of all households. **Figure 26B**, Any Four Housing Severe Problems in the Region, shows that most cities fall within the 20 to 40 percent range of households.

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Table 3: Households Experiencing Any One of the Four Severe Housing Problems

Renters vs. Owners	Number of Households with Problems	Number of Total Households	Percent of Households with Problems
Renters	2,420	5,540	43.68%
Homeowners	1,715	10,245	16.74%
Total	**4,135**	**15,785**	**26.19%**

Source: U.S. Department of Housing and Urban Development. 2017. Consolidated Planning/CHAS Data. https://www.huduser.gov/portal/datasets/cp.html.

4.6.3. Overcrowding

The condition of an area's housing stock is not in itself an impediment to fair housing. However, for many low-income families, substandard housing is the only housing available at an affordable price. According to the 2019 ACS, 34 occupied units in the City lacked complete plumbing facilities. In addition, 136 occupied units in the City lacked complete kitchen facilities. There may be some overlap in the number of substandard housing units, as some units may lack both complete plumbing and kitchen facilities. Approximately 10 percent of the City's total households are overcrowded.[59] Rates of overcrowding can be seen in **Figure 27A**, Overcrowding, with the highest rates being seen in the western core. **Figure 27B**, Overcrowding in the Region, shows a similar trend of overcrowded households being more prominent in urban areas as opposed to outer suburbs. This includes a large swath of the region immediately west of the City.

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[59] U.S. Census Bureau. 2019. Selected Housing Characteristics. 2019 ACS 5-Year Estimates Data Profiles. Table DP04.

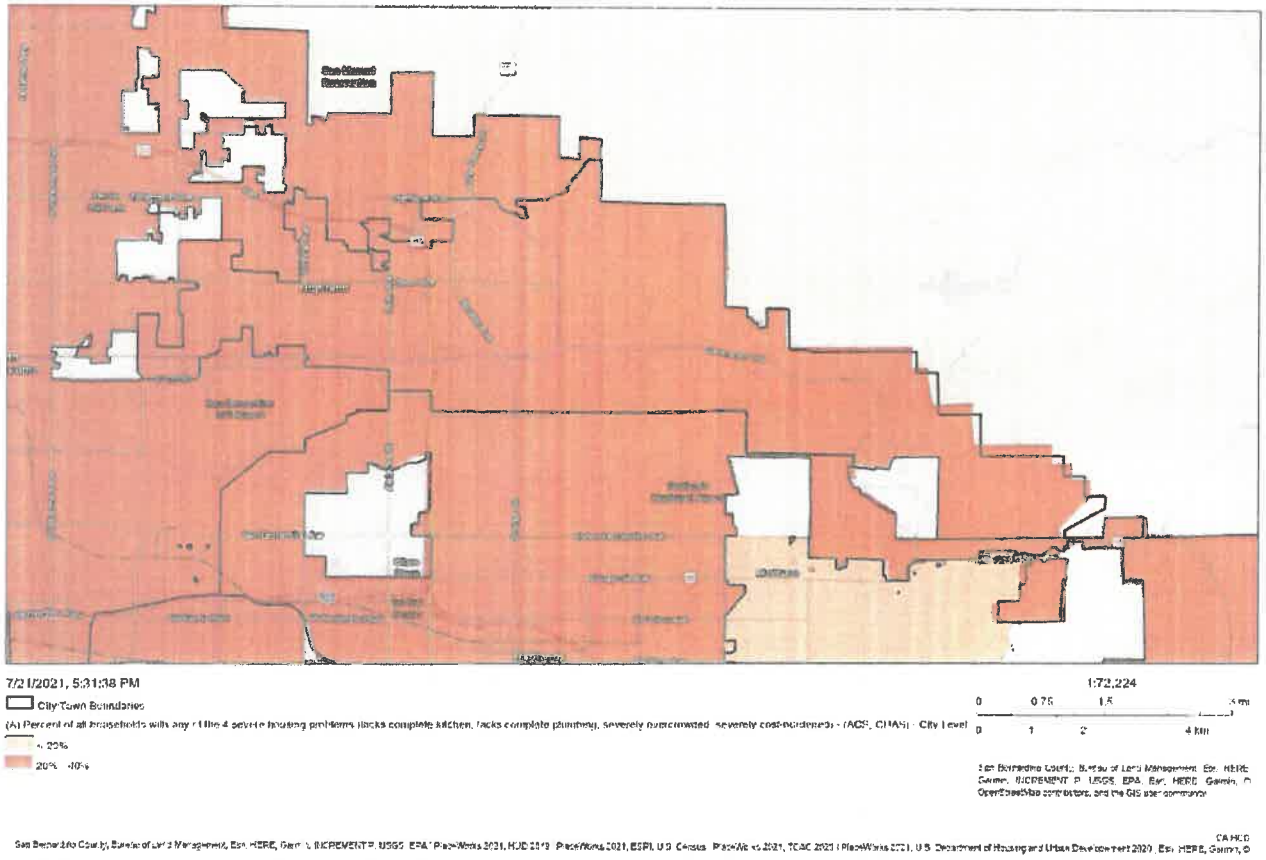


Figure 26A. Any Four Severe Housing Problems[60]

[60] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

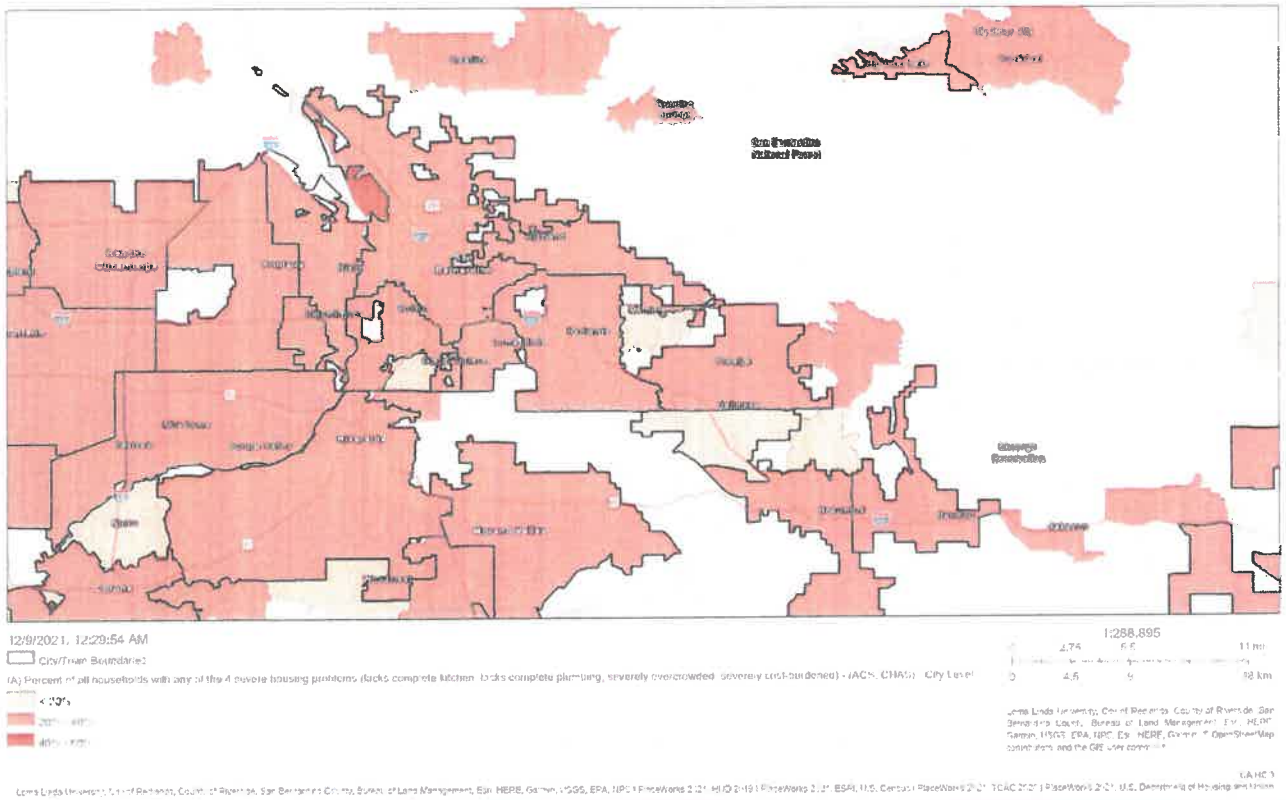


Figure 26B. Any Four Severe Housing Problems in the Region[61]

[61] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

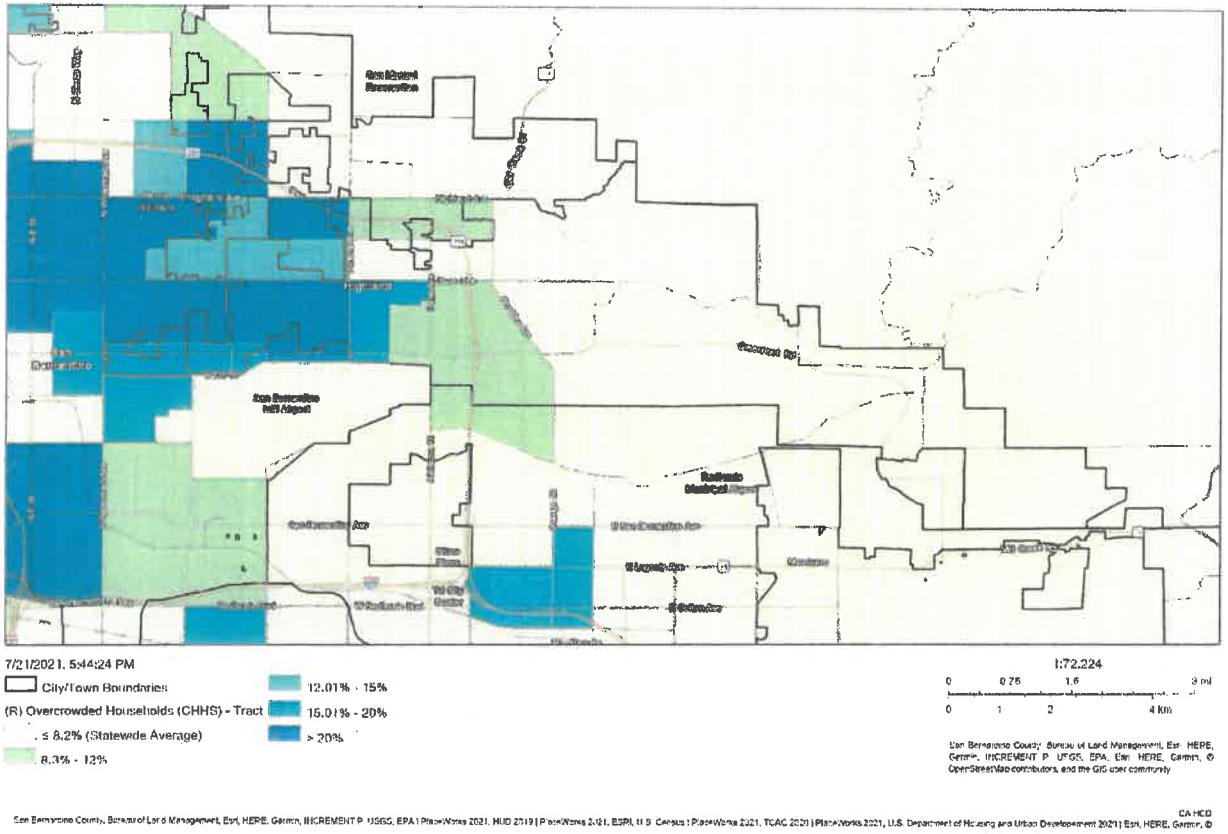


Figure 27A. Overcrowding[62]

[62] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

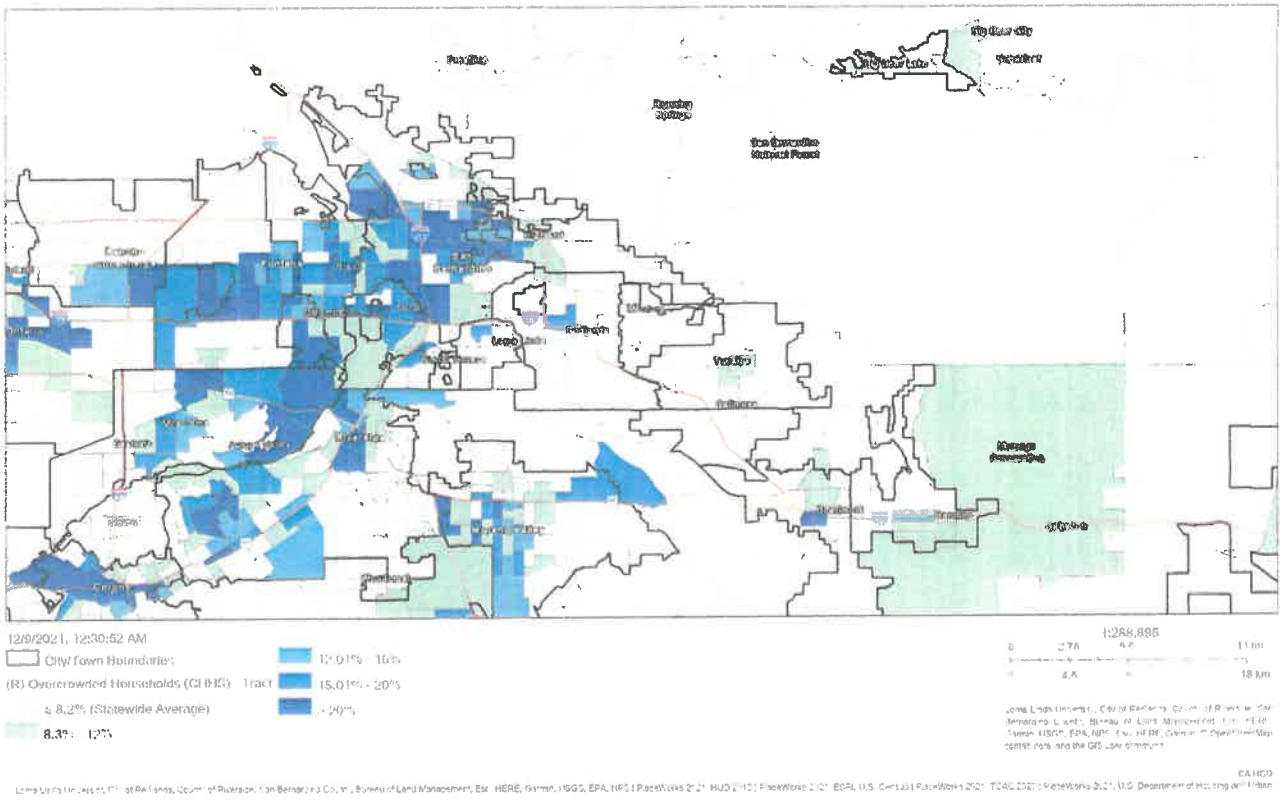


Figure 27B. Overcrowding in the Region[63]

[63] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

4.6.4. Displacement

Displacement is an event that occurs for various reasons, including investment, disinvestment, or even disasters. Gentrification, or the influx of capital and higher-income residents into working-class neighborhoods, is often associated with displacement, which occurs when an increase in demand increase rents for both residential and commercial properties, and lower-income households and businesses are priced out of the community or excluded from entering into the community.

There are different stages of displacement, including at risk of displacement, early gentrification, and advanced gentrification. It is important to understand these stages in context of an area because certain policies to counteract displacement may be more or less effective depending on the stage of displacement. **Figure 28A**, Communities Sensitive to Displacement, shows western Highland to be vulnerable to displacement. This is not surprising because these communities have higher levels of poverty and therefore are more vulnerable to increases in rent. The bigger picture as shown in **Figure 28B**, Communities Sensitive to Displacement in the Region, reveals that these areas situated along major freeway corridors such as SR-90, SR-210, I-10, and I-215, where development may be rapidly changing.

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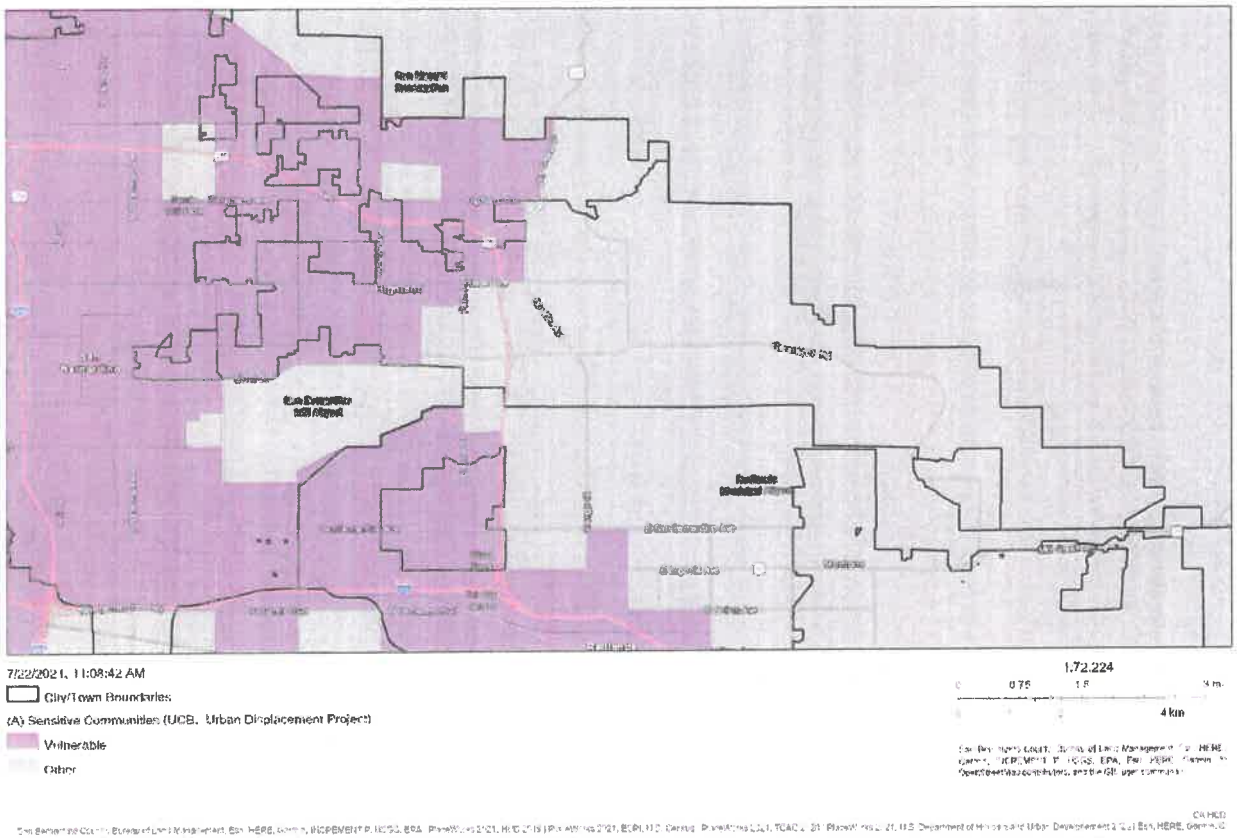


Figure 28A. Communities Sensitive to Displacement[64]

[64] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

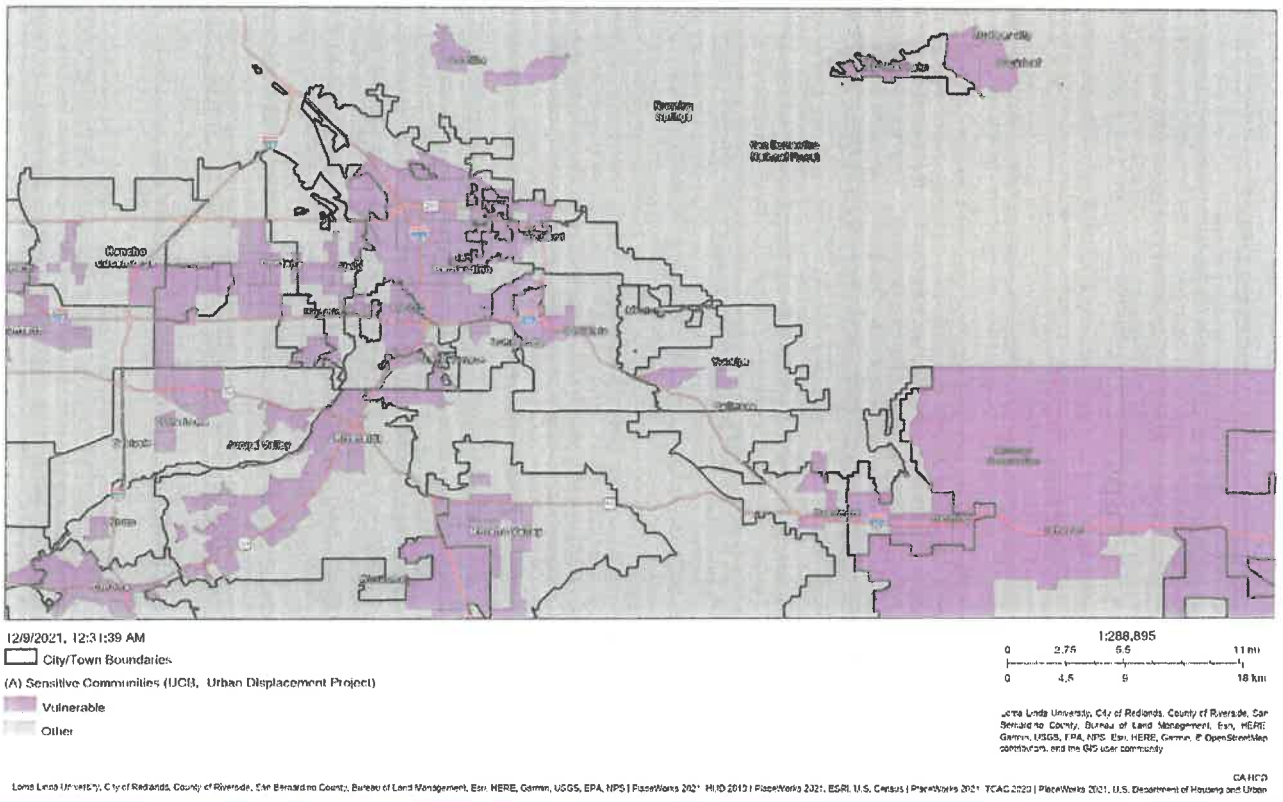


Figure 28B. Communities Sensitive to Displacement in the Region[65]

[65] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

In regard to natural disasters, some areas may be more vulnerable to disaster-driven displacement due to different hazard risks by location. Fires are more likely to impact northern and eastern Highland in the Fire Hazard Severity Zones that can be seen in **Figure 29**, Fire Hazards. Flooding is more of a concern for south-central Highland, and a portion of western Highland along Warm Creek. The flood areas in southern Highland are less of a concern due to the lack of residential land uses there, but along Highland Creek there are some residential areas that could be at risk of flood-driven displacement or concerns with mold after a flood. **Figure 30**, Flood Hazards, displays where these flood zones are located in the City. Seismic hazard is another hazard event that has the potential to cause long- or short-term displacement. There are Alquist-Priolo fault zones that run diagonally across eastern Highland and can be seen in **Figure 31**, Seismic Hazards. While disasters in this area could cause displacement, higher average incomes provide more options for household recovery.

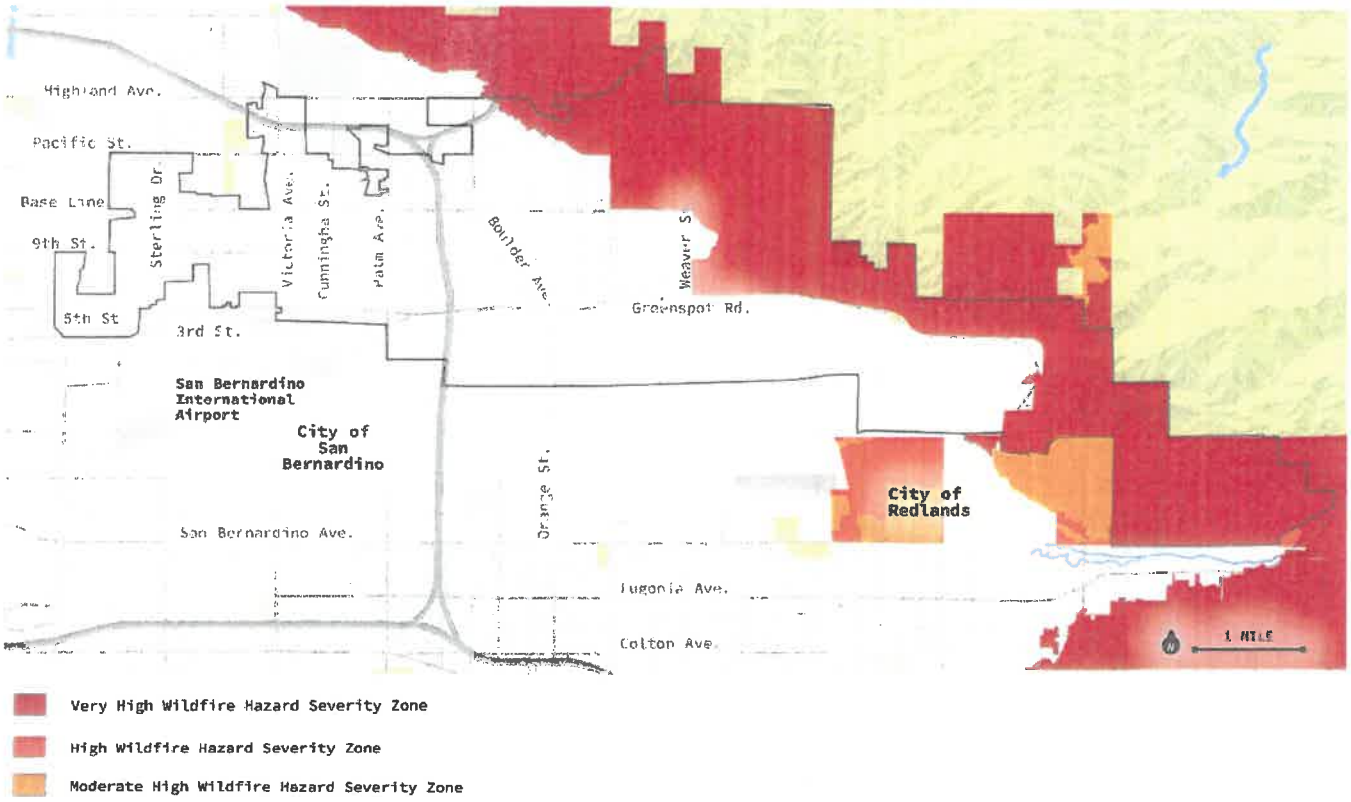


Figure 29. Fire Hazards[66]

[66] CAL FIRE. 2020. California Fire Hazard Severity Zone Viewer. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414.

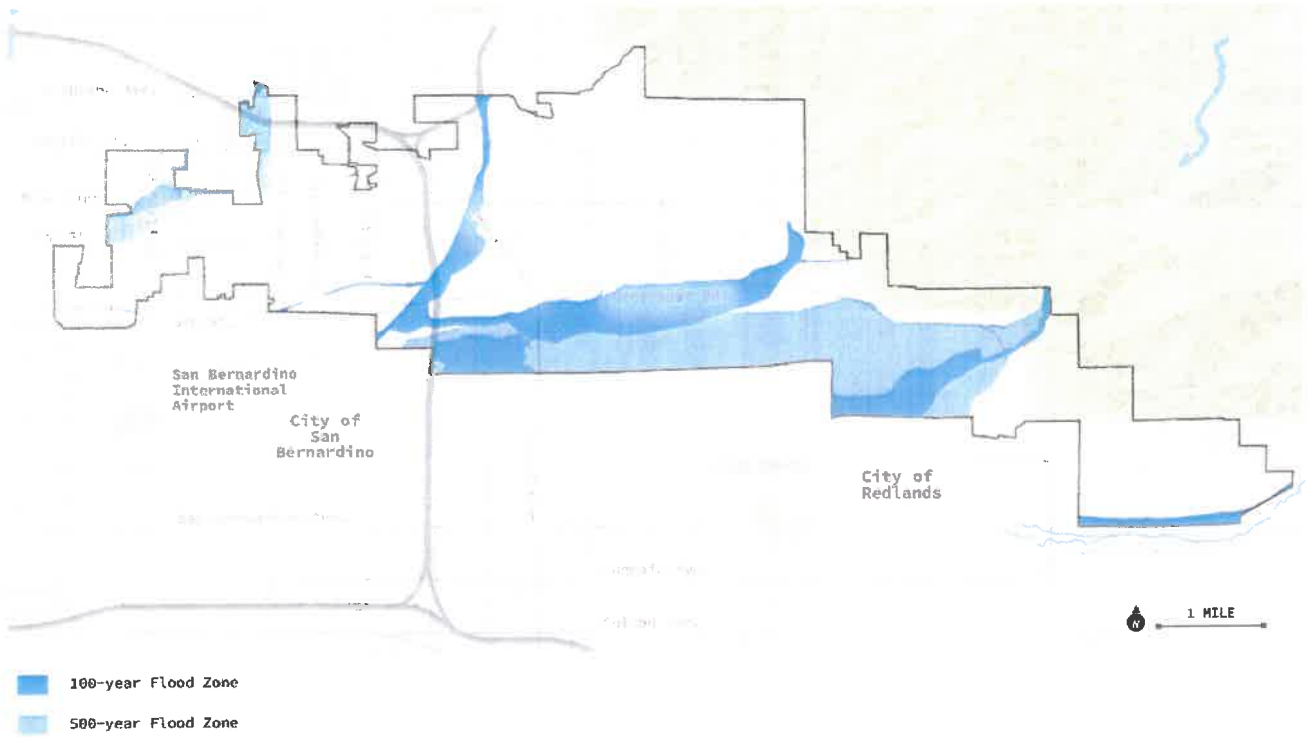


Figure 30. Flood Hazards[67]

[67] FEMA (Federal Emergency Management Agency). 2020. Flood Hazard Layer Areas. https://www.floodmaps.fema.gov/NFHL/status.shtml.

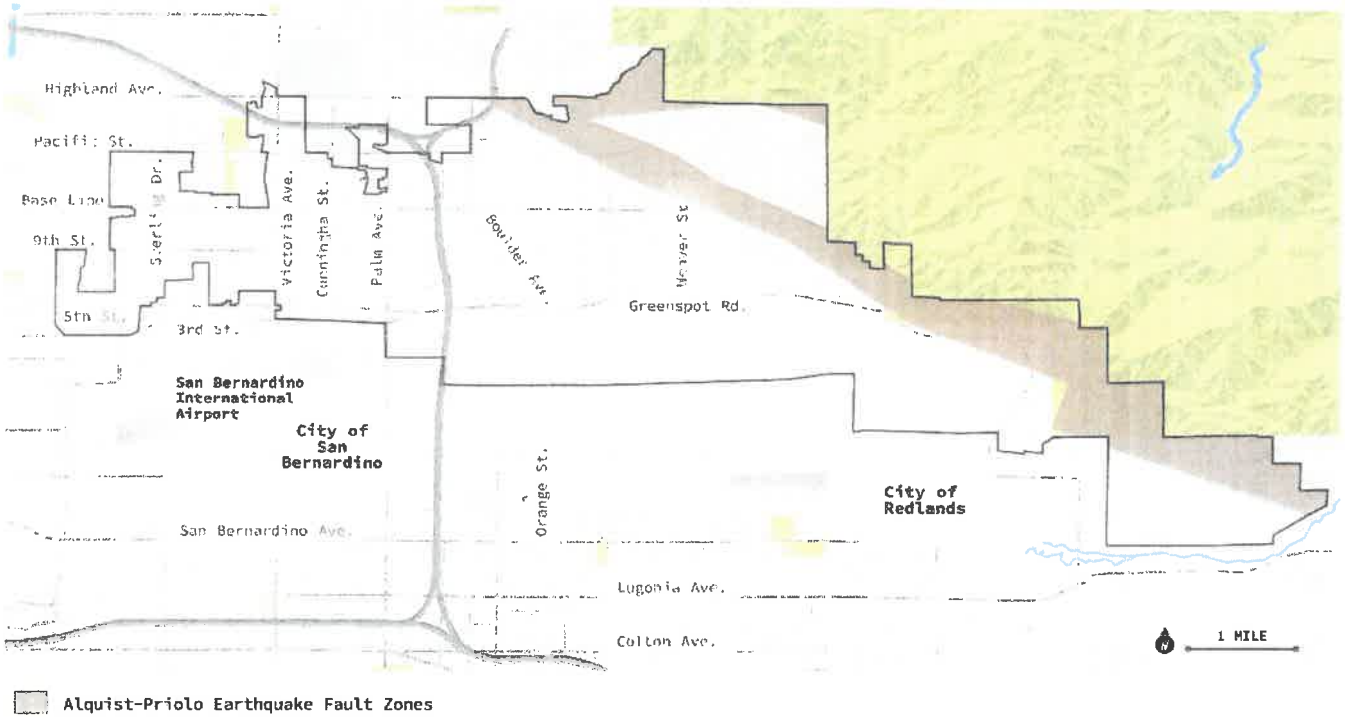


Figure 31. Seismic Hazards[68]

[68] California Department of Conservation. 2015. Regulatory Maps. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps.

4.7. Other Relevant Components

4.7.1. Demographic Trends

In addition to the demographic trends discussed in this Fair Housing Assessment, further demographic trends regarding race, rates of homelessness, age, and population growth can be found in the Community Profile in **Appendix B, Community Profile**. Trends regarding construction, rent prices, and sale prices can be found in **Appendix C, Constraints and Zoning Analysis.**

4.7.2. Public Assistance

Public housing and Housing Choice Vouchers are two ways that municipalities or housing authorities assist lower-income community members with obtaining affordable rents. As can be seen in **Figure 32A**, Housing Choice Vouchers, most Census tracts across Highland have renters receiving Housing Choice Vouchers. Multiple tracts have over 10 percent of renters receiving Housing Choice Vouchers. Figure 32B, Housing Choice Vouchers in the Region, shows that Census tracts with renters receiving Housing Choice Vouchers are in the same areas as where renters are vulnerable to displacement.

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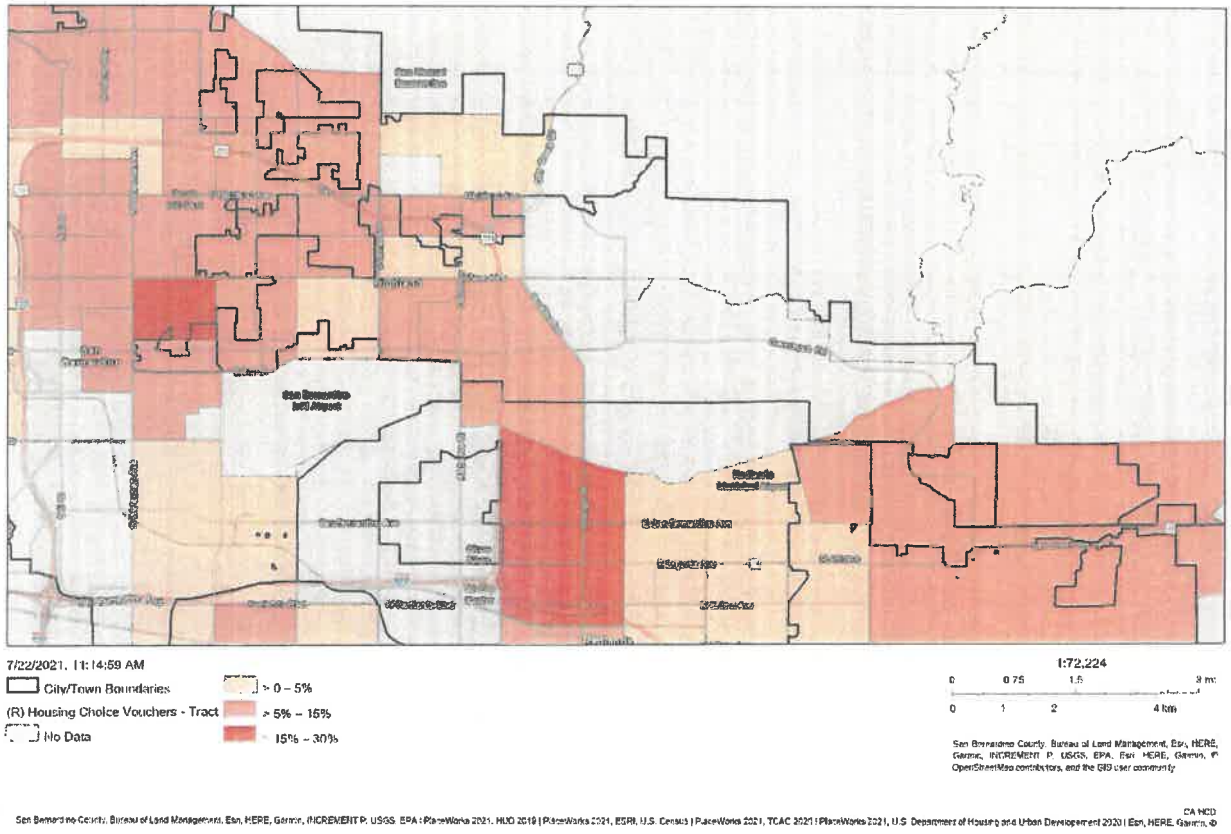


Figure 32A. Housing Choice Vouchers[69]

[69] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

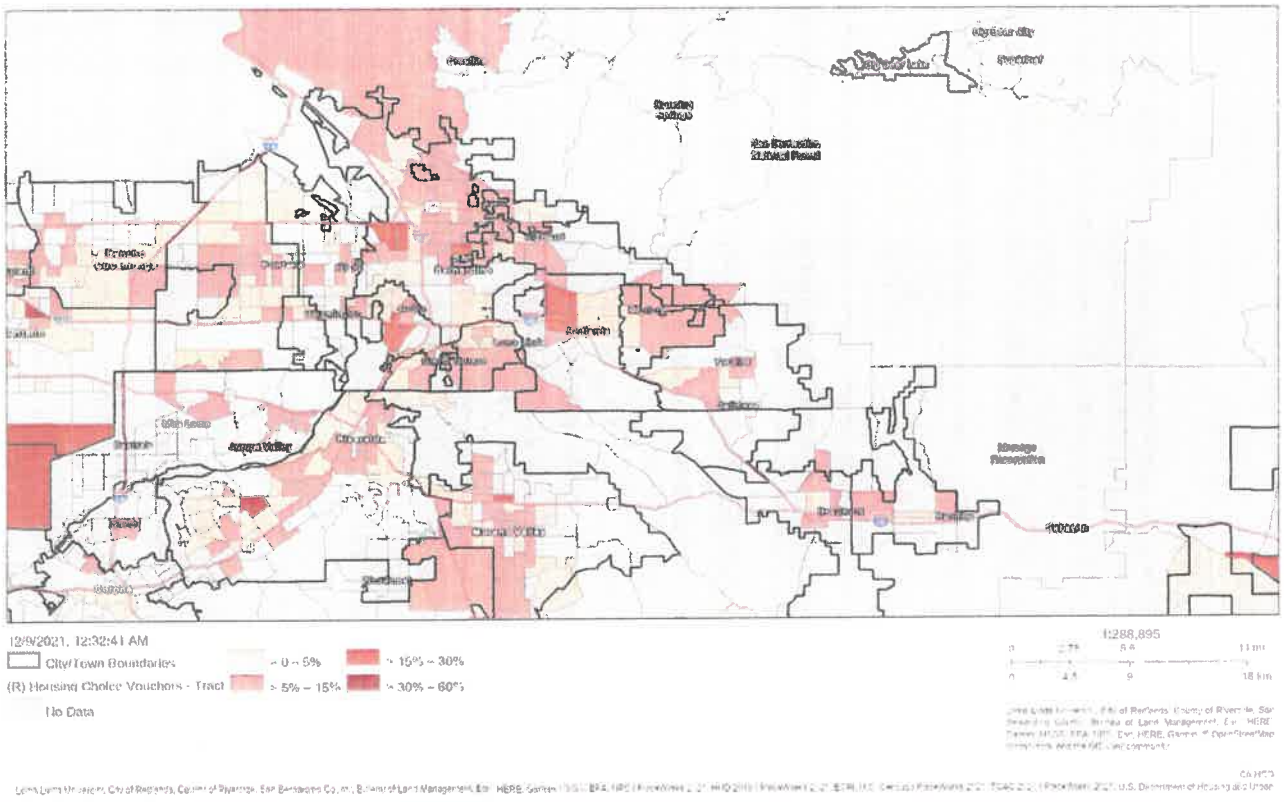


Figure 32B. Housing Choice Vouchers in the Region[70]

[70] HUD. n.d. Affirmatively Furthering Fair Housing. https://egis.hud.gov/affht/.

5. Sites Inventory Analysis Consistency

State law, Government Code Section 65583.2(a), requires that the sites identified in the Sites Inventory be analyzed with respect to the Affirmatively Furthering Fair Housing analysis to determine if the designation of sites serve the purpose of replacing segregated living patterns with balanced living patterns and transforming R/ECAP into areas of opportunity. Through the various goals, policies, and programs present within the Housing Element, the Regional Housing Needs Allocation (RHNA) should adequately be accommodated in a manner that affirmatively furthers fair housing.

5.1. Improved and Exacerbated Conditions

Highland is a city that is primarily segregated, with non-White populations and lower-income households located largely in the western portions of the City, where Boulder Avenue acts as the dividing boundary. Today's segregated living patterns can be explained, in part, by the growth patterns of the past. Historically, the City began as an agricultural community, consisting primarily of citrus orchards. The area west of Boulder Avenue is where the City's earliest suburban development occurred. Initial suburbanization of the area began as early as 1943 with the establishment of the San Bernardino Army Air Depot (now San Bernardino International Airport). This early suburbanization moved east from the San Bernardino area, stopping at City Creek, which intersects Boundary Avenue. Suburban development east of City Creek did not occur until much later, primarily spurred by the development of East Highlands Ranch Planned Unit Development in the 1980s. Development east of City Creek and Boundary Avenue largely consist of single-family zones and planned developments on large swaths of land with few areas of commercial development. Large areas of open space are designated along the City's creeks and along the southern portion of the City, east of City Creek.

Sites identified to accommodate the RHNA consist of sites both east and west of Boulder Avenue and City Creek. Due to the low-density nature of the available sites east of Boulder Avenue, those sites identified in this area are only identified as appropriate to accommodate the moderate- and above moderate-income RHNA. Sites that qualify as meeting the criteria for the lower-income RHNA are located west of Boulder Avenue where there is the greatest access to public parks, public transportation, and commercial services. The sites identified in the Sites Inventory (**Appendix E, Sites Inventory and Analysis**) are shown in **Figure 33**.

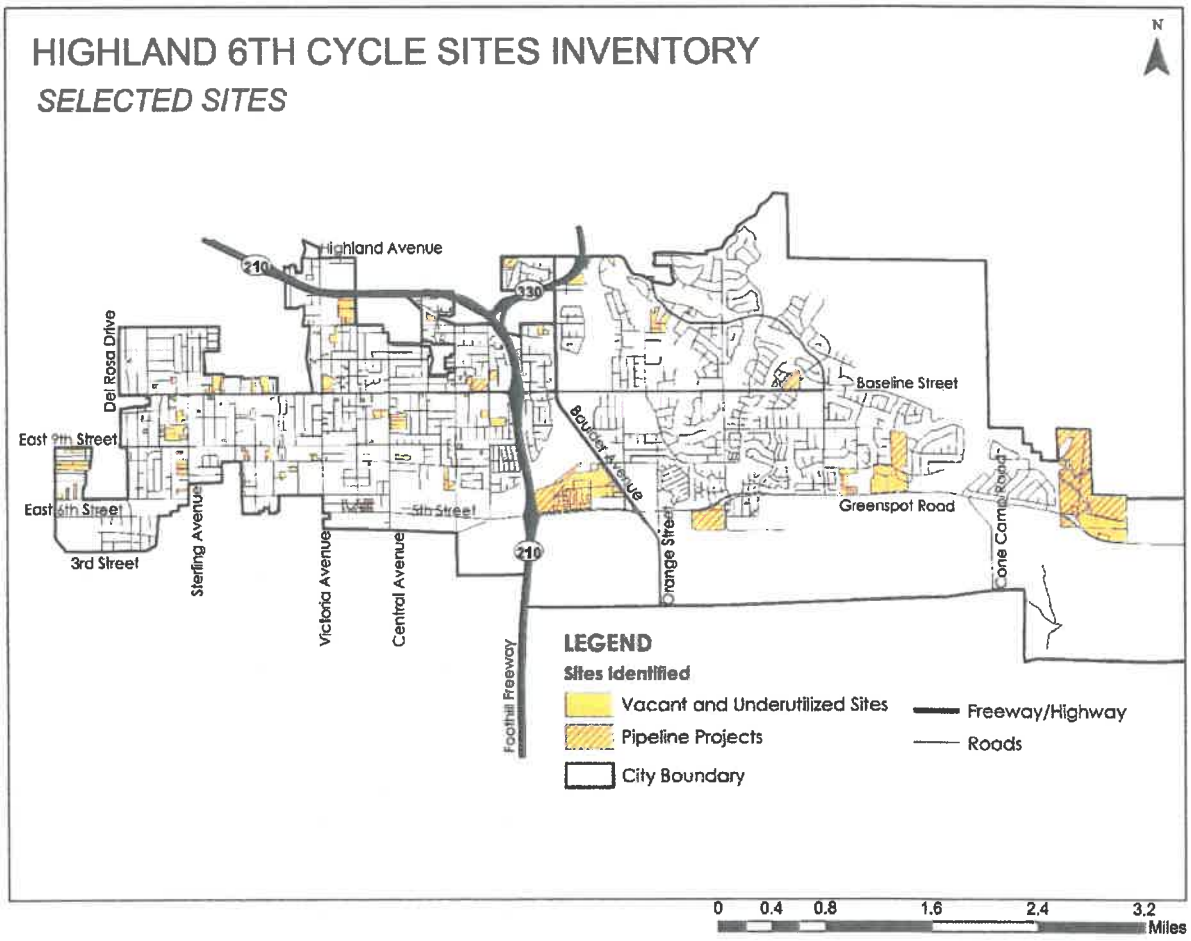


Figure 33. Sites Inventory Map

5.1.1. Segregation and Integration

Racial Demographics

The sites identified in the Sites Inventory to accommodate the lower-income RHNA are located in the areas ~~of Highland~~of the City that are more racially and ethnically diverse, west of Boulder Avenue. As is detailed in **Appendix E**, the selection of lower-income sites is limited in the R-4 Multifamily -Zoning District, as this zone is appropriate to accommodate lower-income housing units per State law [Government Code section 65583.2(c)(3)]. This area is also identified as having a predominant Hispanic population in several tracts. However, the Sites Inventory improves segregated living patterns in the City by identifying moderate- and above moderate-income sites near lower-income sites, in the western areas of the City, to promote housing opportunities at all income levels in a racially and ethically diverse area of the City.

Household Income

The sites identified in the Sites Inventory improve segregated living patterns in the City as it relates to median household income. **Figure 3A**, in Section 4.2.4, indicates that households with lower median incomes are located in the western area of the City with block groups identified as having a median income at less that $30,000, while the eastern side of the City indicated block groups with a median income greater than $125,000. Since zoning adequate for lower-income sites is limited to the western area of the City, the Sites Inventory replaces existing segregation by household income by selecting moderate- and above-moderate sites in the western area of the City near low-income sites. The Sites Inventory also identifies capacity for 200 low-income units within the Grenspot Village and Marketplace Specific Plan which also identifies capacity for moderate-income sites, and 200 above-moderate income units credited toward RHNA as part of a multifamily development project expected to receive their certificate of occupancy within the planning period (see **Appendix E** for further details). Greenspot Village and Marketplace is located in a block group with a median income of greater than $125,000. As such, the designation of sites at all income levels replaces segregated living patterns and improves conditions by promoting mixed-income neighborhoods.

Population with a Disability

There are no segregated living patterns of persons with disabilities in the City. Generally, there is an even distribution of the percentage of the population with a disability throughout the City. The sites identified, of all income levels, are located in tracts where there is less than 10 percent and 10 percent to 20 percent of the population has a disability.

~~with lower household incomes and higher rates of children living in a single-parent home. While the identification of sites to accommodate the lower-income RHNA in this area has the potential to further exacerbate segregation, when development within these areas is paired with investments to increase opportunities for residents, affordable housing units can increase stability for households where it is needed most.~~

~~5.1.1.~~5.1.2. R/ECAPs

There are several R/ECAPs identified in the City's western area, see **Figure 12A**; however, the Sites Inventory **(Appendix E)** improves conditions in the City by identifying above moderate-income sites within the R/ECAPs. All of the lower-income sites identified in ~~Sites Inventory (~~**Appendix E**~~)~~ are located outside of the City's R/ECAPs. As such, the Sites Inventory replaces segregated living patterns by

identifying housing opportunities for households with higher incomes to deconcentrate these areas of poverty. ~~Of the sites identified within R/ECAPs, those sites are identified to accommodate the moderate- and above moderate-income RHNA.~~

~~5.1.2.~~5.1.3. Disparities in Access to Opportunity

While the areas of the City ~~that are~~ **located west of Boundary Avenue have lower rates of positive educational outcomes and lower positive economic outcomes, positive environmental outcomes are relatively consistent throughout the City, with two areas identified as having less than positive outcomes, as previously show in Section 4.5.4, Access to a Healthy Environment, of this analysis.** Sites identified at all income levels fall within low-resource and high poverty and segregation tracts which are more predominant on the western side of the City. Many lower-income sites identified in **Appendix E** fall within low resource areas due to adequate lower-income zoning criteria which limits sites to the western area of the City. Therefore, the selection of lower-income sites has the potential to exacerbate conditions of concentrated housing in low resources areas based on TCAC's scoring. However, the Sites Inventory mitigates this potential by identifying 200 lower-income sites within the highest resource areas in the City as part of the Greenspot Village and Marketplace Specific Plan. ~~Further,~~This area has the highest access to public transportation ~~is highest in the areas east of Boundary Avenue,~~ which is ideal for lower-earning households that have lower rates of automobile ownership. Further, the selection of moderate- and above moderate-income sites within areas of low resources coupled with programs in the Housing Element (detailed below) will increase access to opportunities for residents, incentivize high-quality development projects for all income levels and improve overall conditions in the City.

~~5.1.3.~~5.1.4. Disproportionate Housing Needs, Including Displacement Risk

The sites identified to accommodate the lower-income RHNA are generally located in areas with higher rates of households that are financially burdened by their housing costs, higher rates of household overcrowding, and increased vulnerability to risk of displacement. The development of affordable housing in these areas could provide opportunities for increased housing security for existing residents. When lower-income residents have access to affordable housing, they are no longer at risk of sudden increases in rent. Residents with consistently affordable housing are at a lower risk of displacement due to rent increases in the area. Additionally, because affordable housing is made affordable based on household income and size, residents tend to be less burdened by the cost of housing, leaving money available for other needs. As such, the sites selected in **Appendix E**, improve conditions, and will mitigate displacement risk.

6. Summary of Fair Housing Issues

The following is a list of key conclusions from this Affirmatively Further Fair Housing Analysis:

- **Racial and Economic Segregation:** ~~Highland~~ The City contains three Census tracts considered as R/ECAPs. All three R/ECAP tracts have significantly higher levels of poverty than the City as a whole, with the farthest west R/ECAP having the highest poverty rate at 48.7 percent of the population. The west and middle R/ECAPs have nearly three times the number of renter households as ownership households, and the upper R/ECAP has a nearly equal proportion of renters and homeowners.

The concentration of areas that are both racially and economically segregated lie in the westernmost tracts of Highland. These areas also have higher concentrations of housing cost burden and overcrowding, lower positive outcomes related to education and economics, and the highest concentrations of adults living alone or single female-headed households.

- **Renter Housing Needs**: According to the Census, a total of 10,796 occupied units (66.9 percent) in the City were owner-occupied in 2019, while 5,342 units (33.1 percent) were renter-occupied. The renter households in Highland are primarily located in western Highland, and have access to fewer educational, economic, and transportation opportunities. Over 80 percent of renter households experience one or more of the four severe housing problems, with higher rates of overcrowding and housing cost burden. Ozone and $PM_{2.5}$ levels are higher in western Highland, as are rates for health indicators such as asthma and diabetes. Additionally, access to opportunity for education is higher in eastern Highland and lower in western Highland. These differences follow school district lines, with the Redlands Unified School District Census tracts scoring higher than the San Bernardino Unified School District tracts.
- **Displacement Concerns**: Western Highland is most vulnerable to displacement due to the higher levels of poverty present and lower rates of homeownership, making these residents more vulnerable to increases in rent. Additionally, flooding of Highland Creek could cause hazard-driven displacement in western Highland, causing more strain on the incomes of lower-income residents.

7. Contributing Factors to Fair Housing Issues and Strategies for Affirmatively Furthering Fair Housing

An analysis of the contributing factors to fair housing issues is used to inform the strategies employed by the Housing Element for Affirmatively Furthering Fair Housing. The key fair housing issues identified through this analysis include racial and economic segregation, renter housing needs, and displacement concerns. Those factors that contribute to these issues are those that can most directly be tied to income and wealth. Factors that can contribute to a household's access to income and wealth can include poor access to upward mobility afforded by high educational outcomes; higher wage attainment; physical or developmental ability; access to affordable housing, transportation, and childcare; access to capital assets such as land ownership or homeownership; and other factors such as access to generational wealth. Many factors that can contribute to low access to income and wealth often disproportionately impact racial and ethnic minorities, creating income inequality. For example, the Federal Reserve reports that data from the 2019 Survey of Consumer Finances revealed that the typical White family has eight times the wealth of the typical Black/African American family and five times the wealth of the typical Hispanic/Latino family.

Historically in the United States, housing discrimination has occurred through land use policy and zoning, mortgage lending practices, landlord or property owner decisions on rental applications, and patterns of public and private investment and disinvestment. These trends have resulted in residential segregation based on race, ethnicity, income, disability, and other characteristics, and has limited housing choices and access to opportunities for many Americans, especially for communities of color.

Land use policies and planning can help or hinder people's access to fair housing. It is both possible and desirable to adopt and implement proactive policies that will help to reverse past negative trends and achieve balanced, integrated, and stable residential neighborhoods.

7.1. Prioritization of Contributing Factors and Actions Designed to Meaningfully Address Contributing Factors

The City's priorities for addressing impediments to fair housing issues are identified as follows:

1. **Affordable Housing.** Increased access to quality affordable housing opportunities can greatly improve opportunities for Highland's residents. The City's inclusionary housing ordinance (**Program 4**) will be used for the allocation of funding to support affordable housing for lower-income households. **Program 5** calls for an evaluation of existing development impact fees to identify opportunities for reduced fees in exchange for affordable housing development. Other programs of the Housing Element increase coordination and collaboration with City partners to advocate for increased support in meeting the needs of lower-income households.

   Additionally, the programs of the Housing Element that have been incorporated to assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households, as well as households with special needs include the following:

   - **Program 4, Inclusionary Housing** implements affordable housing production and also collects in-lieu fees that go into the City's affordable housing preservation fund. Through this program the city will identify affordable housing preservation, rehabilitation, and construction opportunities for the expenditure of acquired funds, especially for funding opportunities of housing for extremely low-income households and households with special needs.
   - **Program 5, Impact Fees** will evaluate impact fees for affordable housing developments, especially those that serve extremely low-income households and households with special needs.
   - **Program 6, Density Bonus** the City will update its ordinance, consistent with State requirements, including the provision of a bonus for student affordable housing, senior housing, and 100 percent affordable developments to further support extremely low-income households and households with special needs.
   - **Program 16, Affordable Housing Preservation Program** is focused on assisting homeowners who may be at risk of foreclosure and providing technical assistance for publicly assisted affordable housing for extremely low-, very low-, low-, and moderate-income tenants.
   - **Program 17, Housing for Persons with Disabilities** will increase housing opportunities for those with disabilities, widening the pool of available housing. Through this program the City will promote the availability of the reasonable accommodation procedures, refer individuals and families with developmental disabilities to the Inland Regional Center in San Bernardino, which is the largest nonprofit, State-funded social service facility in the State that focuses on persons with developmental disabilities, and to further opportunities for persons with disabilities and older adults with varying levels of

ability, the City will explore opportunities to connect residents to resources on increasing in-home accessibility by posting materials on its website related to home retrofit guidance and accessibility in accessory dwelling units.

- **Program 18, Residential Care Facilities** is focused on providing an update to the Zoning Code to differentiate between residential care facilities serving six or fewer residents and those serving seven or more residents, permitting residential care facilities serving six or fewer persons by right in all residential zones in accordance with the Welfare and Institutions Code Section 5116.
- **Program 19, Emergency Shelters, Transitional Housing, and Permanent Supportive Housing** will update relevant sections of the Zoning Code to assist in the development of housing for those with special needs and extremely low-income households and to ensure consistency with State law as it relates to supportive housing, emergency shelters, and transitional housing.
- **Program 20, Affordable Housing Partnerships** will support creative models of affordable property ownership and affordable housing preservation through methods such as community land trusts. Informational resources will be provided on the City's website to connect lower-income households, including extremely low-income households and those with special housing needs, to housing advocacy groups, public agencies, and nonprofit organizations in the event that opportunities for purchasing lower-income housing developments become available. The City will conduct outreach to housing advocacy groups to improve coordination and increase publication of how advocacy groups can assist residents.
- **Program 21, Mobile Home Preservation** will provide additional protections for mobile home park tenants by ensuring that any approval for a proposed conversion of an existing mobile home park will first consider the findings of a report that details the impact upon the ability of the displaced residents of the mobile home park to be converted or closed to find adequate housing in a mobile home park.
- **Program 22, Collaborative Partnerships** the City will contact and partner with local affordable housing service providers and will continue to seek financial assistance from other agencies.
- **Program 23, Lot Consolidation Incentive** provides a permit expedite incentive for lot consolidation for multifamily development on sites identified in the Housing Element as having the potential to accommodate lower- or moderate-income units, including those sites with potential for extremely low-income development and development to meet the needs of those with special needs.
- **Program 31, Surplus Lands** will ensure that any lands that are declared as surplus by the City will first be offered for the development of affordable housing, including housing for extremely low-income households and households with special needs.
- **Program 33, Reduced Parking Requirements** will provide a process by which parking reductions can be granted in exchange for affordable housing.

2. **Accessible Housing.** According to the 2019 ACS Census data, about 9 percent (4,946) of the City's population have a disability. Approximately 33 percent (1,746) of the population age 65 and older have a disability. As the population ages, the need for housing to meet varying levels of ability will increase. Accessible housing also ensures safe and quality of housing not only to

disabled persons, but all residents as well. **Program 1**, Homeowner Rehabilitation Program, offers homeowners with funds to finance home improvement projects, including health and safety repairs, that may increase the overall accessibility of a dwelling. **Program 3**, Code Enforcement, ensures that buildings are maintained and are ADA compliant where necessary. **Program 6**, Density Bonus, will provide provision of a bonus that may increase the availability and quality of senior housing. **Program 12**, Accessory Dwelling Units, can provide opportunities for those with special needs and older adults who may wish to live independently, but with near proximity to caregivers. **Programs 17, 18, and 19** can accommodate special needs individuals and older adults by providing access to housing services and care facilities that are temporary or long-term.

3. **Land Use and Planning Decisions.** Land use and planning decisions can influence and restrict needed housing opportunities. Those sites identified in **Appendix E, Sites Inventory and Analysis**, have been identified in those areas with close proximity to employment, education, services, and other resources. While some of the lower-income sites identified in Appendix E were previously identified in past Housing Element cycles, these areas have been determined to be the most ideal for future housing and the most realistic to be developed. **Program 8** of the Housing Element creates a process by which development may be permitted by right where 20 percent or more of the units are affordable on specified sites. This program will further incentivize the production of affordable housing in areas where it is needed most. **Program 11** will support efforts in creating multimodal mixed-use and transportation corridors that will provide residents of all demographics access to mobility and amenities near their homes.
4. **Land Use and Zoning Laws.** With the City being less than 50 years old, more than half of the land consists of single-family residential uses with vacant sites scattered throughout. This number increases to the west of the City where much of the land is still largely undeveloped. Highland is relatively isolated, being located on the outskirts of the metropolitan Inland Empire. Therefore, it is necessary for the City to plan its resources carefully and avoid haphazard growth. It is important that future and existing developments in the city meet local and State laws, are well maintained, and are deemed affordable for future generations. The following programs may assist affordable housing developers in producing fair housing for lower income households:
    - **Program 3, Code Enforcement**, will ensure that no buildings in the City are violating Building and Zoning codes and are up to date with State legislation. This will help to minimize substandard qualities of housing that is often afforded to lower income households.
    - **Program 4, Inclusionary Housing Ordinance**, will continue to seek opportunities for funding of housing for extremely low-income households in the form of preservation, rehabilitation, or constructions.
    - **Program 12, Accessory Dwelling Units**, will provide a program that may incentive the construction and permitting of affordable ADUs.
    - **Program 23, Lot Consolidation Incentives**, will amend the code to provide lot consolidation incentives that may increase multifamily developments and can accommodate lower- or moderate-income units.

- **Program 25, No Net Loss**, will monitor the housing capacity identified in **Appendix E, Sites Inventory and Analysis**, and develop methodology to maintain capacity for remaining RHNA in all income levels.
- **Program 28, Low Barrier Navigation Centers**, will amend the Zoning Code to permit the development of Low-Barrier Navigation Centers as a use by-right in mixed-use and non-residential zones that permit residential uses.
- **Program 29, Affordable Housing Streamlining**, provides a process of streamlining for qualifying affordable and mixed-income housing developments.
- **Program 30, Objective Design Standards**, will help increase the transparency and certainty in the development process by providing verifiable and measurable design standards for future developments.

5. **Fair Housing Outreach.** The Inland Fair Housing and Mediation Board conducts fair housing outreach and other services on behalf of the City. The City is committed to furthering fair housing outreach through the programs of the Housing Element. Through **Program 2**, Residential Rental Enhancement and Rehabilitation Program, the City will continue to provide health and safety hazard checks for landlords, ensuring that tenants are not subject to substandard housing and the City will also continue to provide landlord trainings to ensure property safety measures are taken. **Program 2** further enhances upon this existing program to incorporate fair housing training for landlords. This will expand upon the City's Crime-Free Multiple-Family Rental Housing Program, to ensure that this program is implemented through the lens of fair housing, providing fair housing services for residents and landlords.

Another relevant factor in contributing to fair housing issues is available housing on the market. Although the lack of affordable and accessible housing are impediments to fair housing, the availability of reasonably priced units on the market is yet another contributing factor to fair housing as insufficient supply and increased demand become commonplace for lower income families. As provided under **Section 3.5, Housing Price and Affordability of Appendix B, Community Profile**, local data shows that with the prices of housing lower income households can afford, there ~~is simply not enough housing in that price range~~are very few opportunities ~~that goes into sale~~for rent or for sale for extremely low- and lower-income households. Between 2018 and 2019, property values increased in the City by 6 percent. The City's 2019 median property value was $330,200 which is 1.37 times larger than the national average of $240,500 during the same year. In the case where they do become available, there is likely to be an increase in competition. This occurs commonly in higher density areas that are closer to amenities and resources and finding a home in these locations come at a premium. Such example is shown in **Figures 3A, 11A, 16A, and 27A**, where west Highland is home to a significant non-White population and is close to job opportunities but is also overcrowded and the median income is among the lowest categories. Additionally, Section 8 Housing Vouchers pose a similar issue in which the waiting list for applicants in need of housing is often prolonged due to a lack of availability or incentives.

Additionally, Housing Element **Programs 16, 27, and 28** were developed to further demonstrate the City's commitment to Affirmatively Further Fair Housing through increasing fair housing awareness in the landlord/tenant screening training and through resources on the City's website, continued partnership with the Inland Fair Housing and Mediation Board, and continued participation and engagement in the Regional Analysis of Impediments to Fair Housing Choice. Additional programs are focused on increasing housing access for residents.

Appendix E: Sites Analysis and Inventory

Table of Contents

1 Introduction 3
2 Regional Housing Needs Allocation 3
3 Vacant and Underutilized Sites Methodology and Assumptions 4
3.1 Process Overview 4
3.2 Density and Affordability Assumptions 6
3.2.1 Lower-Income Sites 7
3.2.2 Moderate-Income Sites 8
3.2.3 Above Moderate-Income Sites 8
3.3 Sites Identified in Previous Housing Elements 9
4 Existing Capacity 9
4.1 Planned, Approved, and Prospective Projects 11
4.1.1 Greenspot Village & Marketplace Specific Plan 11
4.1.2 Vista Verde at Mediterra 13
4.1.3 Blossom Trails 13
4.1.4 Highland Park 13
4.1.5 Crestwood Communities 13
4.1.6 Other Pending Projects 14
4.2 Lower-Income Sites 17
4.2.1 Nonvacant Sites 19
4.3 Moderate-Income Sites 32
4.4 Above Moderate-Income Sites 35
4.5 Accessory Dwelling Unit Projection 38
5 Summary of Capacity to Accommodate the RHNA 39

Figures

Figure 1. City Overview of Sites Inventory 10
Figure 2. Pipeline Residential Projects 16
Figure 3. Lower-Income Sites 31
Figure 4. Moderate-Income Sites 34
Figure 5. Above Moderate-Income Sites 37

Tables

Table 1. City of Highland RHNA 2021–2029 4
Table 2. Density Assumptions by Zone 7
Table 3. Summary of Pipeline Residential Development 11
Table 4. Pipeline Residential Development Credited Toward RHNA 15
Table 5. Lower-Income Sites Summary 30
Table 6. Moderate-Income Sites Summary 33
Table 7. Above Moderate-Income Sites Summary 36
Table 8. Accessory Dwelling Unit and Junior Accessory Dwelling Unit Development Trends 38
Table 9. Estimated Affordability of Projected ADUs 2021–2029 39
Table 10. Summary of Residential Capacity Compared to 6th Cycle RHNA by Income, City of Highland, June 30, 2021 through October 15, 2029 40
Table 11. Sites Inventory Table 41

1 Introduction

As provided under California State law (Government Code Section 65583 [a][3]), a Housing Element must include an inventory of land suitable for residential development, including vacant sites that can be developed for housing within the planning period and nonvacant sites that have realistic and demonstrated potential for redevelopment during the planning period to meet the local housing need at all income levels. As further detailed in the Regional Housing Needs Allocation (RHNA) discussion in Section 2, every local jurisdiction is assigned a number of housing units representing its share of the State's housing needs for an 8-year period. The housing need of the City of Highland (City) for the 6th Cycle 8-year planning period [October 15, 2021– October 15, 2029] (6th Cycle) consists of 2,513 total units, including housing at all income levels.

This appendix (sites analysis) of the Housing Element contains an analysis and inventory of sites within City limits that are suitable for residential development during the 6th Cycle. As presented in this sites analysis, the City has an adequate supply of land to fully accommodate the City's housing allocation of 1,028 lower-income units (including very low- and low-income[1]), 471 moderate-income units, and 1,014 above moderate-income units.

This sites analysis describes the City's housing target for the 6th Cycle RHNA projection period [June 30, 2021, to October 15, 2029] (planning period), known as the RHNA; the methodology by which realistic development capacity was determined; and the approach used for the identification of sites. An overview of the existing capacity in the City is also provided, including residential projects in the pipeline with remaining entitlements or pending residential units that are anticipated in the planning period, and the corresponding approved or anticipated affordability for the units in each project, an analysis of vacant and underutilized sites where housing is currently an allowed use, and the projection of accessory dwelling units anticipated for the planning period.

2 Regional Housing Needs Allocation

Pursuant to State law, each jurisdiction in the State has a responsibility to accommodate a share of the projected housing needs in its region. The California Department of Housing and Community Development (HCD) assesses each region's housing needs and allocates a unit count (the RHNA) to each region in the state. The RHNA is mandated by State housing law as part of the periodic process of updating local Housing Elements of General Plans. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods.

As part of the assessment and allocation process, each Councils of Governments develops a methodology to determine each jurisdiction's RHNA as a share of the regional housing need provided by HCD. Each jurisdiction's RHNA is broken down by income category, ensuring that all economic groups are accommodated. The methodology generally distributes more housing, particularly lower-income housing, near jobs, transit, and resources linked to long-term improvements of life outcomes, and must further State objectives, including affirmatively furthering fair housing.

[1] For sites that are identified in the Sites Inventory to meet the lower-income RHNA, it is assumed that 50% of the realistic capacity of a site counts toward the low-income RHNA, and 50% of realistic capacity counts toward the very-low income RHNA.

The City's share of regional housing need was determined by a methodology prepared by the Southern California Association of Governments (SCAG) as part of its Final Regional Housing Needs Assessment Allocation Plan adopted in March 2021 and updated June 2021. In accordance with the Final RHNA Allocation Plan, the City must plan to accommodate 2,513 total housing units for the projection period beginning June 30, 2021, and ending October 15, 2029. This is equal to a yearly average of approximately 303 housing units. The 2,513 total units are split into four RHNA income categories (very low-, low-, moderate-, and above moderate-income). **Table 1** provides the City's RHNA by income category. Of the 2,513 total units, the City must plan to accommodate 619 units for very low-income households, 409 units for low-income households, 471 units for moderate-income households, and 1,014 units for above moderate-income households from 2021 to 2029.

Table 1. City of Highland RHNA 2021–2029

Income Category	Units	Percent of Total
Very Low-Income[1]	619	24.6%
Low-Income	409	16.3%
Moderate-Income	471	18.7%
Above Moderate-Income	1,014	40.4%
Total	**2,513**	**100%**

1. The City has a RHNA of 619 very low-income units. Pursuant to State law (AB 2634), 50% of the very low-income units are assumed to be extremely low-income. Therefore, the City's RHNA of 619 very low-income units may be divided into 309 extremely low-income units and 310 very low-income units. However, for the purposes of identifying adequate sites for the RHNA, the State law does not mandate the separate accounting of units for extremely low-income households.

To ensure that adequate capacity is maintained in the City throughout the 6th Cycle, additional capacity above and beyond the RHNA assigned to the City has been identified. In accordance with State requirements, the City will monitor the housing capacity identified in this sites analysis throughout the planning period to maintain sufficient capacity for the remaining RHNA at all income levels.

3 Vacant and Underutilized Sites Methodology and Assumptions

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and to demonstrate that sufficient land is available to provide adequate housing capacity to meet the RHNA for each income level. This section of the sites analysis describes the methodology used to calculate the housing capacity on all vacant and nonvacant developable land within the City limits that is zoned to allow for housing and available to develop within the Housing Element planning period.

3.1 Process Overview

As part of the sites analysis, the City and consulting team had to identify specific sites that are suitable for residential development to determine whether there are sufficient sites to accommodate the City's

regional housing need in total and by income category. This analysis helped the City determine the programs that the City will adopt to make sites available with appropriate zoning, development standards, and infrastructure capacity to accommodate the new construction needed during the 6th Cycle (see complete infrastructure capacity discussion in the Housing Element's **Appendix C, Constraints and Zoning Analysis**).

The sites analysis was completed using geographic information system (GIS) mapping software using multiple data sets to identify potentially available housing sites, largely depending on SCAG's annual land use parcel-level dataset (ALU v.2019.2) available from SCAG's open GIS data portal (last updated in June 2021). SCAG's land use dataset provides extensive parcel-level data, including existing land uses principally based on 2019 tax assessor records.[2] In addition, online mapping tools, including Google Earth and Google Maps, as well as City knowledge of the current projects in the pipeline and development interest in certain areas of the City, were used to verify vacant and underutilized status and existing uses.

With the large quantities of vacant land that exist in the City, the sites analysis largely depends on those vacant sites within City limits that permit for residential development under their existing Municipal Code zoning district (zoning district). Additionally, a small number of sites identified in the sites inventory include nonvacant, underutilized parcels. Under State law, if a housing element relies on nonvacant sites to accommodate 50 percent or more of its RHNA for lower-income households, the nonvacant site's existing use is presumed to impede additional residential development, unless the housing element describes findings based on substantial evidence that the use will likely be discontinued during the planning period. However, only 11 total parcels identified to accommodate lower-income households have existing uses, while 27 total parcels identified to accommodate lower-income households are vacant. Meaning that the housing element relies on nonvacant sites to accommodate less than a third of its RHNA for lower-income households. Nonetheless, the nonvacant sites were thoughtfully selected based on clear evidence that the existing uses on the sites identified to be underutilized are not considered an impediment to future development. Determining which nonvacant sites are underutilized and have the strongest potential for redevelopment can help identify ideal areas for accommodating new housing through redevelopment and capitalizing on existing infrastructure. Underutilized sites are identified through thorough and selective criteria to determine which existing uses are most likely to redevelop when paired with the right land use designation, regulations, and policies. As part of this identification process, an analysis of underutilized sites was conducted to determine where to prioritize Housing Element programs that aim to increase opportunities for housing development.

In addition to analyzing the existing uses and proximity to resources and existing infrastructure on each parcel, the methodology for identifying and prioritizing underutilized sites was largely based on the following factors:

- **Building Age** – Building that are 50 years or older (all but two residential buildings identified on underutilized parcels were built prior to 1971). The age of housing is often an indicator of

[2] Sources of 2019 existing land use: SCAG_REF – SCAG's regional geospatial datasets; ASSESSOR – Assessor's 2019 tax roll records; CPAD-California Protected Areas Database (version 2020a; accessed September 2020); CSCD – California School Campus Database (version 2018; accessed September 2020); FMMP – Farmland Mapping and Monitoring Program's Important Farmland GIS data (accessed September 2020); MIRTA – U.S. Department of Defense's Military Installations, Ranges, and Training Areas GIS data (accessed September 2020).

housing conditions. In general, housing that is 30 years or older may need minor repair. Housing over 50 years old is considered aged and more likely to generate major repairs.

- **Floor Area Ratio** – Buildings with a floor area ratio (FAR) less than 0.15. FAR is the ratio of a building's total floor area to the size of the piece of land upon which it is built. The average FAR of nonvacant sites identified to accommodate the RHNA for lower-income households is 0.03.
- **Site Size** – Parcels greater than 0.5 acres or less than 10 acres, or smaller parcels with the potential for lot consolidation resulting in a site greater than 0.5 acres. Development of housing affordable to lower-income households on individual parcels that are smaller than 0.5 acres or larger than 10 acres is not typically considered realistic or feasible. However, parcels less than 0.5 acres may be included if there is the potential for combining small lots into larger lots to accommodate higher-density development through lot consolidation (see additional details in **Section 3.2.1**, Lower-Income Sites), which the City will incentivize through **Program 23**, Lot Consolidation Incentive, of the Housing Element.

While a few nonvacant sites identified to be underutilized have existing residential uses, none of the underutilized sites are known to have been occupied in the past 5 years with housing occupied by lower-income residents. In addition, the existing units on the sites were subtracted from the realistic capacity to calculate the net-new units, and only net-new units were ultimately accounted for toward accommodating the City's RHNA.

All parcels included in the sites inventory were reviewed for any known environmental constraints; the sites included in the inventory have all been designated for residential development and are not constrained by known site-specific constraints that would limit development. Parcels that were identified as having absolute constraints[3] were removed from the site inventory.

Land suitable for residential development must be appropriate and available for residential use in the planning period. As such, the sites were also reviewed according to their development standards and regulations, and compared to recently approved or built residential projects in the same designations where housing is an allowed use.

3.2 Density and Affordability Assumptions

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate that the projected residential development capacity of the sites identified in the Housing Element can realistically be achieved. This realistic capacity may use established minimum densities to calculate the housing unit capacity. The sites analysis estimated realistic capacity as shown in **Table 2**, Density Assumptions by Zone. As a conservative estimate of capacity calculations, the sites analysis estimated realistic capacity based on the minimum permitted density of 20 dwelling units per acre in the City's R-4 zone and Greenspot Village & Marketplace Specific Plan for sites identified to accommodate the City's lower-income RHNA. This does not limit the ability of a project to be built at the higher densities allowed under either the zoning or the General Plan. Furthermore, it is expected that property owners will strive for densities above the minimums, assuming developers can earn greater profits for construction on the same parcel of land. Sites identified to accommodate the City's RHNA with pending projects have been calculated based on their approved or expected densities

[3] Per Connect SoCal's Sustainable Communities Strategy Technical Report's (adopted 3, 2020) areas identified to avoid placement of future growth, including absolute constraints such as preserved land where growth has been reduced and redirected, as well as variable constraints where growth could be avoided if possible.

and affordability (see Section 4.1, Planned, Approved, and Prospective Projects, for a detailed overview of residential development in the pipeline).

Table 2. Density Assumptions by Zone

Zoning District	Maximum Density (dwelling units per acre)	Realistic Density (units per acre)	Income Level
R-4 (Multifamily District)	30	20	Lower
R-3 (Multifamily District)	18	12	Moderate
MU (Mixed Use District)	18	12	Moderate/ Above Moderate
R-2 (Two-Family District)	12	8	Moderate
R-2C (Corridor Residential District)	9	6	Moderate
R-1 (Single-Family District)	6	4	Above Moderate
VR (Village Residential District)	6	4	Above Moderate
EHV (East Highland Village District)	6	4	Above Moderate
A/EQ (Agricultural Equestrian District)	2	2	Above Moderate
PD (Planned Development District)[1]	Varies[2]	Varies	Moderate/ Above Moderate
Greenspot Village & Marketplace (SPR-006-001)	Planning Area 2: 30 Planning Area 3: 40[3]	Varies[3]	Lower/ Moderate / Above Moderate
Mediterra Planned Development (PD 13-001)	Varies[4]	Varies[4]	Moderate/ Above Moderate

Source: City of Highland Municipal Code, Title 16 Land Use and Development, 2021.

1.The maximum overall intensity of areas designated Planned Development shall be consistent with the provisions of the Highland General Plan or determined through the development review process. Development within areas designated Planned Development are processed using a Specific Plan pursuant to Government Code Section 65450, a planned unit development, a Conditional Use Permit or a similar device.

2. Per the City of Highlands General Plan Land Use Element, Densities for Planned Development areas vary and typically range from 4.6 to 12.0 dwelling units per acre.

3. See Section 4.1.1, Greenspot Village & Marketplace Specific Plan, and Sections 4.2, Lower-Income Sites, and 4.3, Moderate-Income Sites.

4. See Section 4.1.2, Vista Verde at Mediterra, and Sections 4.3, Moderate-Income Sites, and 4.4, Above Moderate-Income Sites.

3.2.1 Lower-Income Sites

In accordance with Housing Element law (Government Code Section 65583.2[c][3]), the City's default density for lower-income sites must permit at least 30 dwelling units per acre. Further, it is detailed under State guidance that sites that are too small or too large (less than 0.5 acres or greater than 10 acres) may not facilitate developments affordable to lower-income households. As such, sites included in the lower-income sites inventory with only one parcel have been limited to parcels between 0.5 and 10 acres. However, parcels less than 0.5 acres may be included if there is the potential for combining small lots into larger lots to accommodate higher-density development through lot consolidation. In total, only two sites identified as appropriate to accommodate lower-income units (Sites 9A and 18B as identified in **Table 11**, Sites Inventory Table) include more than 1 parcel and have been identified as having the potential to be reasonably consolidate into one site based on evidence discussed in **Section**

4.2, Lower-Income Sites. The City will incentivize lot consolidation through **Program 23**, Lot Consolidation Incentive, of the Housing Element by amending the Highland Municipal Code to incentivize lot consolidation through an expedited development permit review process on sites identified in the Sites Inventory as having the potential to accommodate lower- or moderate-income units. ~~of this income level, so sites have been limited to those between 0.5 and 10 acres. Generally, a site is a parcel or a group of parcels that can accommodate a portion of the jurisdiction's RHNA. Parcels less than 0.5 acres that have been included in the lower-income sites inventory are anticipated to be consolidated into one site and have been clearly marked.~~ All parcels identified as having the potential to be consolidated as a single site, have been clearly marked by a letter following the site number in **Table 11.**

The City has one zoning district that permits densities of 30 dwelling units per acre, the R-4, Multifamily District. As such, sites identified in this zoning district were included in the inventory as lower-income sites. In addition, the City currently has a Residential High Density Special Overlay (HDS) that permits densities of at least 20 but not greater than 30 units per acre. However, the 52-acre HDS Overlay is now located entirely within the 104-acre Greenspot Village & Marketplace Specific Plan (Specific Plan) area which allows for a greater density range. The Specific Plan, which was adopted in 2013 (SPR-006-001 Greenspot Village & Marketplace), allows a density range of 18 to 40 dwelling units per acre. As such, the sites analysis relied on the development standards of the Specific Plan in lieu of the HDS Overlay, and sites identified in the Specific Plan zoning designation were included in the inventory for all three income categories: lower-, moderate-, and above moderate-income.~~,~~ ~~as~~Specifically, vacant sites in the Specific Plan area were identified as appropriate to accommodate lower- and moderate-income housing, further detailed in **Sections 4.2**, Lower-Income Sites, and **4.3**, Moderate-Income Sites, while units in the project pipeline in the Specific Plan area have been credited toward the above -moderate-income RHNA based on their approved affordability (see discussion related to TREH Partners development detailed in **Section 4.1.1**, Greenspot Village & Marketplace Specific Plan).

3.2.2 Moderate-Income Sites

Primarily vacant sites in the R-3 (Multifamily District), MU (Mixed Use District), R-2 (Two-Family District), and R-2C (Corridor Residential District) districts were inventoried at the moderate-income level based on each zoning district's permitted uses and maximum densities ranging from 9 to 18 dwelling units per acre. All four zoning districts provide opportunities for a range of housing choices at medium densities. As such, all sites identified within the designations were inventoried at the moderate-income level. In addition, select sites in the PD (Planned Development District), Mediterra Planned Development (PD 13-001) and Greenspot Village & Marketplace (SPR-006-001) zoning districts were identified as having the capacity to accommodate moderate-income sites.

3.2.3 Above Moderate-Income Sites

Primarily vacant sites in the Single-Family (R-1), Village Residential (VR), East Highland Village (EHV), and Agricultural Equestrian (A/EQ) districts were inventoried at the above moderate-income level based on each zoning district's permitted uses and maximum densities ranging from 2 to 6 dwelling units per acre. All four zoning districts provide opportunities for a range of housing choices at low densities. As such, all sites identified within the designations were inventoried at the above moderate-income level. In addition, based on the unit count and affordability expected for projects in the pipeline, one site in the Mixed Use (MU) zoning district, and select sites in the Planned Development (PD), Mediterra Planned

Development (PD 13-001), and Greenspot Village & Marketplace (SPR-006-001) zoning districts were identified as having the capacity to accommodate above moderate-income sites.

3.3 Sites Identified in Previous Housing Elements

Per the statute (Government Code Section 65583.2[c]), a nonvacant parcel identified in a previous planning period and a vacant parcel that has been included in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the parcel is subject to a program in the Housing Element to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

A total of 30 of the parcels identified in the 2021 Housing Element for lower-income housing were included in a previous Housing Element (see below for individual site and parcel details). Housing Element **Program 8** commits the City to permit the development of housing by right on these parcels where 20 percent of the total units in the development will be affordable to lower-income households, consistent with Assembly Bill 1397 (2017). All parcels included in previous cycle(s) in accordance with the criteria of State law, are called out in the first column of **Table 11, Sites Inventory Table.**

4 Existing Capacity

The following is a description of planned, approved, or prospective projects expected to be completed within the planning period, and the residential capacity on vacant and underutilized sites within each zoning district permitting residential uses. **Figure 1**, City Overview of Sites Inventory, provides an overview of the existing capacity identified in the sites inventory. The vacant and underutilized sites identified in Figure 1 are the vacant and nonvacant sites that have been included in the sites inventory. It is not a comprehensive inventory of all vacant and underutilized sites in the City.

Figure 1. City Overview of Sites Inventory

4.1 Planned, Approved, and Prospective Projects

Several development projects in the pipeline are seeking entitlements or actively pursuing construction, or have prospective development expected to be built within the planning period. **Table 3**, Summary of Pipeline Residential Development, summarizes the current inventory of nine residential projects included in the sites inventory with active entitlements or under review, or with prospective development and expected to be built within the planning period. **Figure 2**, Pipeline Residential Projects, provides an overview of the nine residential projects in the pipeline included in the sites inventory. As of August 2021, there were an estimated ~~1,313~~752 housing units in the pipeline that are counted toward meeting the 6th Cycle RHNA. There are a number of other projects in the City with residential units, such as single-unit developments, that have not been included in this analysis but are expected to be completed during the planning period.

Table 3. Summary of Pipeline Residential Development

Project	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
Total Pipeline Residential Development Credited Toward RHNA	~~200~~—	~~250~~—	~~863~~752	~~1,313~~752

Source: City of Highland
RHNA = Regional Housing Needs Allocation
See Sites ~~233–243~~232-240 in Table 11 for individual site and parcel details.

4.1.1 Greenspot Village & Marketplace Specific Plan

The Greenspot Village & Marketplace Specific Plan is a master-planned, mixed-use development located west of Interstate 210 within the area identified in the City's General Plan Land Use Element as the "Golden Triangle Community Policy Area," and the City's zoning designation SPR-006-001. The Specific Plan includes three planning areas Planning Area 1 allows for commercial uses; Planning Area 2 allows for residential uses; and Planning Area 3 permits a mix of residential, commercial, governmental, and professional office uses. The total number of dwelling units between Planning Areas 2 and 3 may not exceed 800. Planning Areas 2 and 3 allow development at density ranges of 20 to 30 and 18 to 40 dwelling units per acre and permit 500 to 700 units and 100 to 300 units, respectively; within that limit, dwelling units may be transferred between Planning Areas 2 and 3.

As detailed in the section below, a total of 200 multifamily units in Planning Area 2 expected to be completed during the planning period have been credited toward the above moderate-income RHNA (see **Section 4.1.1.1**, Planning Area 2/ TREH Partners Project, for details). In addition, a 200-unit residential project in Planning Area 3 will be completed during the planning period; however, construction is already underway and the units were previously included in the City's 2020 annual progress report during the 5th Cycle planning period, so they have not been credited towards the 6th Cycle RHNA (see **Section 4.1.1.2**, Planning Area 3, for details). Based on the total number of residential units permitted by the Specific Plan, a remaining capacity of 400 total units exists in the Specific Plan area. As a residential project has not been proposed and approved by the City for the remaining capacity of 400 units, they are not credited as pipeline projects, but they have been identified as existing capacity

and included in the Sites Inventory (see **Sections 4.2**, Lower-Income Sites, and **4.3**, Moderate-Income Sites).

4.1.1.1 Planning Area 2/ TREH Partners Project

Planning Area 2 is envisioned for high-density residential villages and open space and permits a minimum of 20 and up to 30 dwelling units per acre and allows single-family detached and attached housing, including townhomes, duplexes, and small to large multiple-family attached structures. The planning area permits 500 to 700 dwelling units so long as the total dwelling unit count for the overall Specific Plan area does not exceed 800 dwelling units. ~~Due to the permitted densities, purely residential uses and range in housing types permitted, and vacant land available, the sites inventory expects housing to be developed at a mix of income levels in Planning Area 2, including 100 lower-income units and 200 moderate-income units. In addition,~~ A 200 unit, rental ~~market-rate attached single-family and~~ multifamily project is expected to be developed by TREH Partners as part of the Greenspot Crossings/Marketplace project, an approximately 19.8-acre mixed-use project (Parcels 1201-331-01, 1201-341-01, 1201-341-08, and 1201-341-09). As of August 2021, City Council approved a Design Review Application (DRA No. 20-012) for the construction of approximately 85,316 square feet of commercial uses (Greenspot Crossings) within Planning Area 1, a 200 attached residential unit complex with a 6,214-square-foot clubhouse in Planning Area 2, and a Tentative Parcel Map (TPM No. 20-002) to increase the number of parcels from four parcels to eight parcels. The 200 units will be built on an 8.79-acre pad for an average density of approximately 22.75 dwelling units per acre~~, and~~. They are expected to be built in the planning period, and they have been ~~included~~ credited toward ~~in the sites inventory as~~ the above moderate-income RHNA~~units~~.

4.1.1.2 Planning Area 3

Planning Area 3 is envisioned for a mix of residential, retail, office, and commercial uses and permits a minimum 18 and up to 40 dwelling units per acre. The planning area permits 100 to 300 dwelling units so long as the total dwelling unit count for the overall Specific Plan area does not exceed 800 dwelling units. There is currently one active project in Planning Area 3, the San Carlo Townhome Apartments. The San Carlo Townhome Apartments project is a 200-unit development on Greenspot Road, being developed by Rexco Development at an approximate density of ~~18~~20 dwelling units per acre. The residential project, entitled in 2020, is located on 10.85 acres on the southern portion of Planning Area 3 and was finishing the construction plan check and process for the grading permits in March 2021. As such, the 200 units have been excluded from the sites inventory, leaving a remaining capacity of 100 units permitted in Planning Area 3.

~~Based on the permitted densities, range in housing types, and vacant land available, the 100 units have been included in the sites inventory as having the capacity to accommodate lower-income sites.~~ Based on the total number of 800 residential units permitted under the Specific Plan, a remainder of 400 units can be built between Planning Areas 2 and 3. The Sites Inventory assumes housing will be developed at a mix of lower-and moderate-income levels in Planning Areas 2 and 3, including 200 lower-income units and 200 moderate-income units. See **Sections 4.2**, Lower-Income Sites, and **4.3**, Moderate-Income Sites, for details on existing capacity.

4.1.2 Vista Verde at Mediterra

Mediterra is a planned development community (PD 13-001) off Greenspot Road on the far eastern side of the City. ~~The project~~Mediterra includes eight planning areas that allow for a low-density residential development of 200 residential lots (2.1 to 6 dwelling units per acre); a medium-density development of 110 residential units (4 to 12 dwelling units per acre); six estate lots (0 to 2 dwelling units per acre); and several lettered lots containing two parks, landscaping, and a water quality management basin on approximately 178 gross acres. ~~As of August 2021, a~~ A Design Review Application (DRA-21-007) was ~~submitted~~ approved by Planning Commission (Resolution No. 2021-014) in August 2021 ~~to the City~~ for Vista Verde at Mediterra by D.R. Horton for the construction of a 149 single-family home community, a public park, public trails, a private common area, a private community pool, and recreation center within Phases 1 and 2 of the Mediterra Planned Development (Parcels 0297-021-25, 0297-021-26, 0297-021-27, and 0297-021-28). The 149 single-family units in Vista Verde at Mediterra are expected to be built in the planning period, and they have been credited toward the above moderate-income RHNA (see **Table 4**).~~included in the sites inventory as above moderate-income units.~~

The remaining 167 dwelling units that are permitted in the Mediterra Planned Development expected to be completed as part of Phase III and IV of the Mediterra development have ~~in the community have been~~ not been credited towards the RHNA, however they have been identified as existing capacity and have been included in the sites inventory as moderate- and above moderate-income units based on the range of medium and low densities permitted (see ~~Table 4~~**Sections 4.3**, Moderate-Income Sites, and **4.4**, Above -Moderate--Income Sites).

4.1.3 Blossom Trails

Blossom Trails is a residential housing development in East Highlands Ranch on the southwest corner of Church Street and Greenspot Road that will include 137 single-family units on approximately 25.5 acres (Parcels 1201-401-02 and 1201-431-61) at an approximate density of 5.4 dwelling units per acre. The City adopted the development's Tentative Tract Map (TTM 17-001, No. 20090) and Tentative Parcel Map (TPM 17-002, No. 19958) in March 2018. The 137 units are expected to be completed during the planning period and have been included in the sites inventory as above moderate-income units.

4.1.4 Highland Park

Highland Park is a planned development community on the north side of Base Line Street in the eastern side of the City. The project has received a Tentative Tact Map (TTM 19915), which received an extension of 18 months under Assembly Bill 1561 but has not received building permits as of June 2021. The site is approximately 7.9 acres and will include 46 single-family market-rate residential units and a neighborhood park, at an approximate density of 6 dwelling units per acre. The 46 units are expected to be completed during the planning period and have been included in the sites inventory as above moderate-income units.

4.1.5 Crestwood Communities

The Crestwood Communities development is planned to accommodate ~~49~~ 50 market-rate, attached condominiums within 12 two-story buildings, associated landscaping, active and passive recreation amenities, and parking. The City approved a Tentative Tract Map (TTM 18-002, No. 20190) for a planned development on approximately 4.2 acres (Parcel 1200-041-02) in 2018 at an approximate density of 12

dwelling units per acre. The ~~49~~ 50 units are expected to be completed during the planning period and have been included in the sites inventory as above moderate-income units.

4.1.6 Other Pending Projects

Other pending projects that have been included in the sites inventory are as follows:

Kiel 54 at 29996 Santa Ana Canyon Road (Parcel 1210-371-51)

- 54 single-family homes on approximately 21.6 acres at a density of approximately 2.5 dwelling units per acre. A Tentative Tract Map was approved by the City (TTM 018-001, No. 20142) in 2018. The 54 units are expected to be completed during the planning period and have been included in the sites inventory as above moderate-income units.

Senior Assisted Living Facility (Parcels 1191-181-01 and 1191-191-06)

- 60 units entitled by the City in 2018 (Resolution 2018-008). The site is located on Base Line Street east of Sterling Avenue next to the Mountain Breeze Villas, a 168-unit affordable housing apartment complex. The 60 units are expected to be completed during the planning period on approximately 2 acres at a density of approximately 30 dwelling units per acre, and have been included in the sites inventory as above moderate-income units.

Tractor Supply Co. Project (Parcels 1200-381-43 and 1200-381-05)

- A mixed-use project planned to include ~~15~~ 20 market-rate multifamily units and ~~2~~ 1 single-family home~~s~~, a Tractor Supply Site store, retail space, and a fast-food drive-through restaurant on approximately 9.1 acres. The proposed project is being developed by Woodcrest Real Estate Ventures and is located at the intersection of Base Line Street and Church Avenue. As of August 2021, the City had received the project's Design Review Application (DRA-21-004). Construction is expected to begin in 2022 and be completed 1 year later. The ~~23~~ 21 units have been included in the sites inventory as above moderate-income units.

~~Paseo Del Oro~~Highland Heights (Parcel 1200-421-34)

- ~~34~~ 35 small-lot single-family homes being developed by KZ Companies on approximately 2.9 acres at a density of approximately 12 dwelling units per acre. As of August 2021, the project has been entitled by the City, but has not received permits. The project is located across from the Tractor Supply Co. project on Base Line Street and Church Avenue. The ~~34~~ 35 units are expected to be completed during the planning period and have been included in the sites inventory as above moderate-income units.

Table 4, Pipeline Residential Development Credited Toward RHNA, provides a detailed overview of the current inventory of nine residential projects included in the sites inventory with active entitlements, under review, or with prospective development and expected to be built within the planning period.

Table 4. Pipeline Residential Development Credited Toward RHNA					
Corresponding Map ID (See Figure 2)	Project	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units Credited Toward RHNA
A	TREH Partners Project in Greenspot Village & Marketplace Specific Plan ~~(including TREH Partners project)~~	~~200~~—	~~200~~—	200	~~600~~200
B	Vista Verde at Mediterra	—	~~50~~—	~~266~~149	~~316~~149
C	Blossom Trails	—	—	137	137
D	Highland Park	—	—	46	46
E	Crestwood Communities	—	—	~~49~~50	~~49~~50
F	Senior Assisted Living Facility	—	—	60	60
G	Kiel 54	—	—	54	54
H	Tractor Supply Co.	—	—	~~17~~21	~~17~~21
I	~~Paseo Del Oro~~Highland Heights	—	—	~~34~~35	~~34~~35
Total Units		~~200~~—	~~250~~—	~~863~~752	~~1,313~~752

Source: City of Highland
RHNA = Regional Housing Needs Allocation

Figure 2. Pipeline Residential Projects

4.2 Lower-Income Sites

~~In addition to the 200 lower-income units identified in the Greenspot Village and Marketplace Specific Plan, t~~The City has identified capacity for ~~1,128~~1,261 lower-income units on vacant and underutilized sites. With a total of ~~1,328~~1,280 lower-income units, including projections for accessory dwelling units discussed in **Section 4.5**, ~~,~~ the City has identified an adequate supply of land to accommodate the City's housing allocation of 1,028 lower-income units (including 619 very low- and 409 low-income units), as well as a buffer, as required to accommodate the RHNA throughout the planning period.

All ~~1,128~~1,261 units on vacant and underutilized sites identified as having the capacity to accommodate lower-income units are located on sites in the Multifamily (R-4) and Greenspot Village & Marketplace Specific Plan (Greenspot Specific Plan) zoning districts. The R-4 zoning district provides for the development of multifamily attached residential dwelling units with enhanced amenities (common open space and recreation areas) at a minimum density of 20 dwelling units per gross acre and a maximum density of 30 dwelling units per gross acre. As previously discussed in **Section 4.1.1**, Greenspot Village & Marketplace Specific Plan, the Specific Plan includes three planning areas. Planning Area 1 is purely commercial, Planning Area 2 permits residential uses, and Planning Area 3 permits a mix of commercial and residential uses. The total number of dwelling units may not exceed 800; within that limit, dwelling units may be transferred between Planning Areas 2 and 3. Planning Areas 2 and 3 include the following density ranges and maximum dwelling units:

- Planning Area 2 has an allowed density range of 20 to 30 dwelling units per acre and permits a maximum of 500 to 700 dwelling units.
- Planning Area 3 has an allowed density range of 18 to 40 dwelling units per acre and permits a maximum of 100 to 300 dwelling units.

Based on the total number of residential units permitted by the Specific Plan and the two projects currently in the pipeline, there is a remaining capacity of 400 total units in the Specific Plan area. 100 of those units may be built in Planning Area 3, and the remaining 300 to 400 dwelling units may be built in Planning Area 2 unless dwelling units are transferred between Planning Areas 2 and 3. Considering permitted densities, purely residential uses, range in housing types permitted, and vacant land available, the Sites Inventory assumes housing will be developed at a mix of lower- and moderate-income levels in Planning Areas 2 and 3. As such, 100 lower-income units in Planning Area 2 and 100 lower-income units in Planning Area 3 have been included in the Sites Inventory. The remaining 200-unit capacity has been identified as appropriate to accommodate moderate-income units (see **Section 4.3**, Moderate-Income Sites). It should be noted that the parcels in Planning Areas 2 and 3 have been grouped together as Sites 27C and 27D, respectively, in **Table 11**; however, unlike the other sites identified to be consolidated and denoted by a letter following their site number in **Table 11**, all of the parcels included in Sites 27C and 27D are not expected to all be consolidated and developed as a single site. Instead, the developers have the flexibility to develop the sites in accordance with the unit cap set for each Planning Area.

Approximately 69 acres of the City are in the R-4 designation, and 104 acres are in the Greenspot Specific Plan. However, as discussed in **Section 3.2.1**, only parcels or consolidated sites (sites can be made up of single parcels, or two or more parcels that are anticipated to be consolidated and developed into a single site) greater than 0.5 acres or less than 10 acres have been included in the sites inventory.

Based on the permitted density and range of permitted multifamily residential uses and neighborhood-serving amenities, the sites have been identified as appropriate to accommodate lower-income housing.

The two lower-income sites that were identified as having the potential for combining two small lots into larger lots through lot consolidation are sites 9A and 18B as identified **in Table 11**, Sites Inventory Table. Both sites include a total of two parcels that have been identified as having the potential to be reasonably consolidated into one site. Each site contains a parcel that is individually larger than the minimum 0.5-acre requirement, and as such, those parcels would still be appropriate to accommodate the lower-income RHNA without assuming they will be consolidated. However, both parcels in Site 9A and 18B are owned by the same property owners. Under each site's common ownership and adjacent geographical locations, it is reasonable to assume that the parcels could be consolidated as one site. To facilitate this opportunity, the City will incentivize lot consolidation through an expedited development permit review process. See **Program 23, Lot Consolidation Incentive**, of the Housing Element for program details.



Image i. Site 9A

Both parcels in Site 9A are owned by the same property owner. The larger parcel (Assessor's Parcel Number 1191-181-07) is a 4.56-acre vacant lot. The second parcel (Assessor's Parcel Number 1191-181-06) is a 0.16-acre vacant lot. As shown on the image (**i. Site 9A**), it would be extremely reasonable to assume that the parcels could be consolidated into one site to maximize the lot size and development opportunity.

Both parcels in Site 18B are also owned by the same property owner. The larger parcel (Assessor's Parcel Number 1191-241-17) on the right is a 0.66-acre vacant lot and was identified as underutilized based on the existing use and structure built in 1965 with a floor area ratio of 0.06. The second parcel (Assessor's Parcel Number 1191-241-18) on the left is a 0.41-acre vacant lot. As shown on the image (**ii. Site 18B**), it would be reasonable to assume that the parcels could be consolidated into one site to capitalize on the adjacent vacant lot and maximize the lot size and development opportunity.

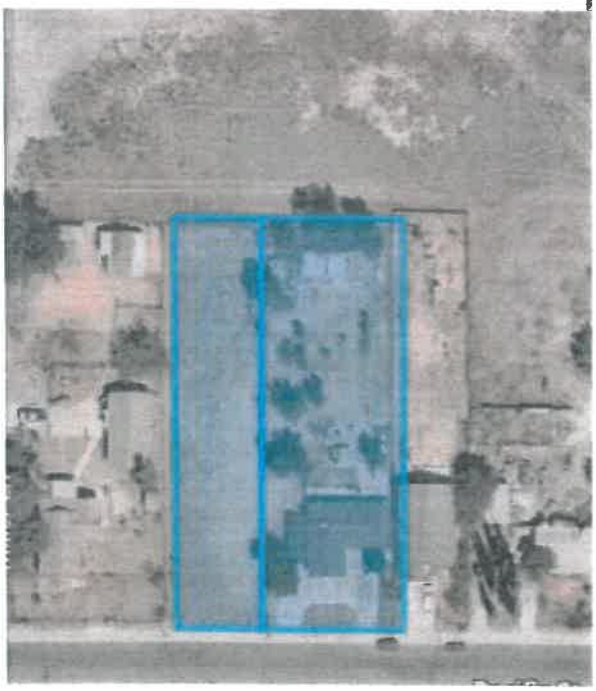


Image ii. Site 18B

Based on a realistic residential development potential of 20 dwelling units per acre in the R-4 and Greenspot Specific Plan zone, a total of ~~31~~ 28 sites ~~(including three consolidated sites)~~ with ~~1,128~~1,261 units on approximately ~~57~~ 94 total acres have been included in the sites inventory. **Table 5** provides a summary of all vacant and underutilized lower-income sites in the R-4 and Greenspot Specific Plan zoning districts identified in the sites inventory, including ~~22~~ 27 vacant parcels and ~~16~~ 11 underutilized parcels making up a total of ~~31~~ 28 sites.

4.2.1 Nonvacant Sites

All but two of the underutilized parcels identified have structures built over 55 years ago, and the average year of construction for all underutilized parcels is 1949. While many of the underutilized sites have existing residential uses, the majority are single-family homes with one residential unit on large parcels, and the average floor-area-ratio for all underutilized parcels included is 0.04. The majority of the land in the underutilized parcels remain largely undeveloped without any existing structures that may constitute an impediment to additional residential development. A site by site description and explanation for the methodology used to determine the additional development potential of the parcels identified as underutilized within the planning period is provided below. It is expected that the programs of the Housing Element that aim to streamline and facilitate affordable housing, as outlined in Section 4 of **Appendix C**, coupled with market conditions related to housing market trends, are strong incentives to encourage additional residential development on the sites identified as underutilized.

4.2.1.1 Site 2 (APN 0278-131-48)

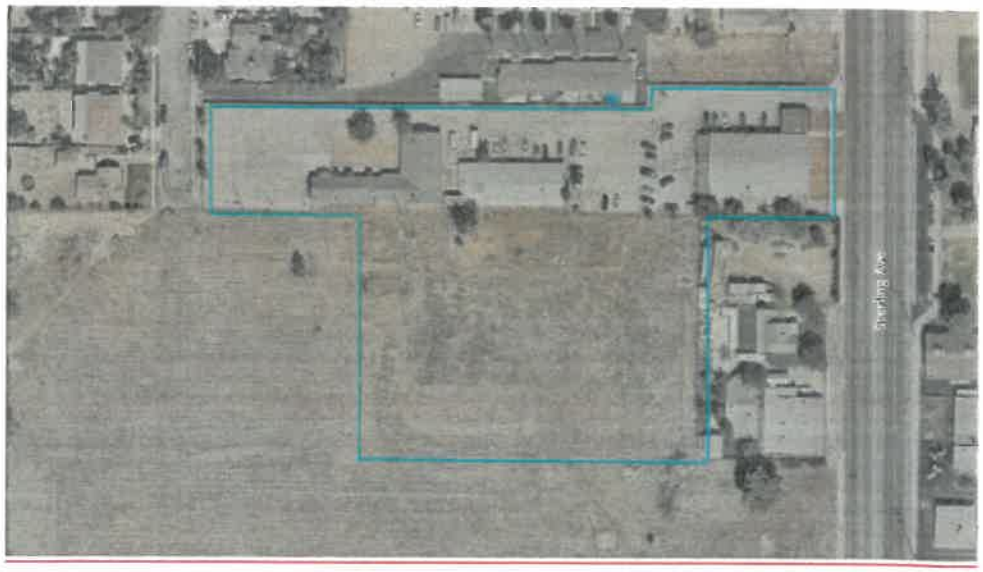


Image iii. Site 2

Site 2 was determined to have additional development potential within the planning period. As can be clearly seen on **Image iii. Site 2**, the majority of the site remains completely undeveloped and is currently underutilized as a large, open dirt field. On the northern portion of the site, there appear to be three nonresidential structures. Assessor's land use data recognizes two structures on the property built in 1980 and classifies the structures as facilities. The overall floor area ratio is 0.04 and the parcel has an unbuilt acreage of approximately 3.4 acres. There is opportunity for redevelopment of the parcel, or development of the southern undeveloped portion of the lot, by the current owner or a potential developer through a lot split or lot line adjustment. While they are not part of Site 2, two large, vacant parcels south and west of Site 2 are owned by the same owner, and, they have been identified as Sites 3

and 5 in the Sites Inventory. Market conditions related to housing market trends and record-prices, could be a strong incentive to encourage additional residential development on Site 2. Based on the realistic development potential and minimum density permitted in the R-4 zone, Site 2 could accommodate approximately 76 lower-income dwelling units.

4.2.1.2 Site 6 (0278-201-26)

Site 6 was identified as underutilized largely based on the clearly abandoned existing use and underutilized parcel as a large portion of the lot remains undeveloped. The existing structure is a vacant and extremely dilapidated building with a floor area ratio of 0.08 and a for sale sign as shown on **Image iv, Site 6**. While they are not part of Site 6, the two large, vacant parcels east and west of Site 6 share common ownership with Site 6 and are included as Sites 7 and 8 in the Sites Inventory. Based on the realistic development potential and minimum density permitted in the R-4 zone, Site 6 could accommodate approximately 19 lower-income dwelling units.



Image iv. Site 6

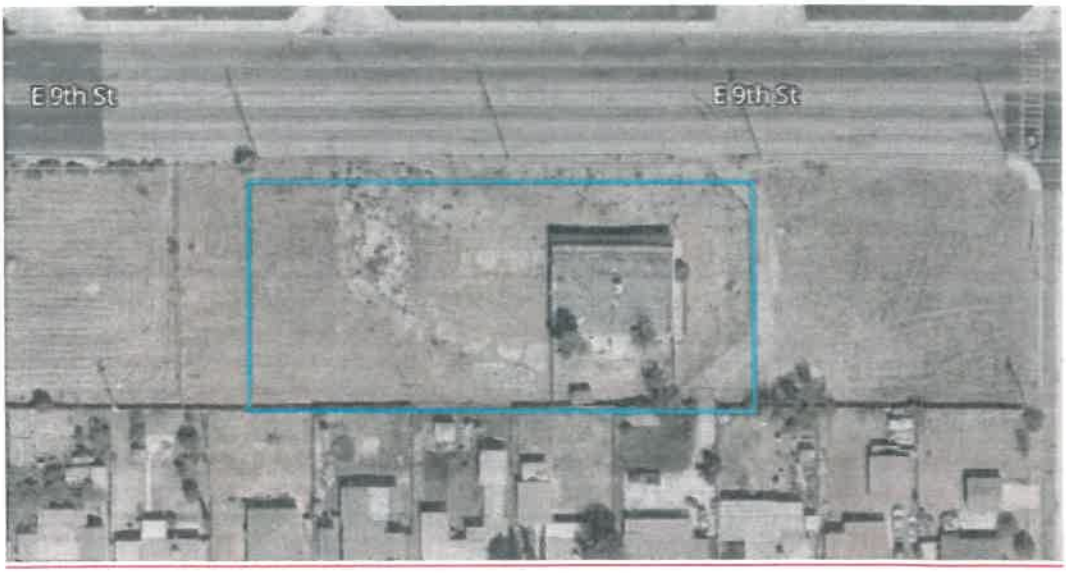


Image v. Site 6 Aerial View

4.2.1.3 Sites 12 through 14

Sites 12 through 14 are located on the north side of the City. They are each adjacent to each other and share common ownership. As is clearly shown on **Image vi. Sites 12 through 14 Aerial View**, the majority of each parcel remains largely undeveloped as open dirt or grass fields. The sites are within a half mile to many resources including a grocery store, public park, senior center, two high schools and an elementary school. They are also near several commercial and residential projects in the City's development pipeline, signaling developer interest in the area.



Image vi. Sites 12 through 14 Aerial View

Site 12 (1191-241-09)

The northern parcel shown on **Image vi. Sites 12 through 14 Aerial View**, Site 12, has one existing residential unit built in 1979 with a floor area ratio of 0.033. The 1.46-acre site remains largely undeveloped and has an unbuilt acreage of approximately 1.25 acres, as shown on **Image vii. Site 12.** Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 29 lower-income dwelling units (28 net new units).



Image vii. Site 12

Site 13 (1191-241-10)

The middle parcel shown on **Image vi. Sites 12 through 14 Aerial View**, Site 13, has one, 66-year-old existing residential unit built in 1955 with a floor area ratio of 0.0099. The approximately 4.91-acre site remains largely undeveloped and has an unbuilt acreage of approximately 4.77 acres, as shown on **Image viii. Site 13**. Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 98 lower-income dwelling units (97 net new units).



Image viii. Site 13

Site 14 (1191-241-12)

The bottom parcel shown on **Image vi. Sites 12 through 14 Aerial View**, Site 14, has one, 58-year-old existing residential unit built in 1963 with a floor area ratio of 0.0099. The 4.92-acre site remains largely undeveloped and has an unbuilt acreage of approximately 4.77 acres, as shown on **Image ix. Site 14**.

Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 98 lower-income dwelling units (97 net new units).



Image ix. Site 14

4.2.1.4 Site 17 (1191-241-15)

Site 17 is identified as underutilized, largely based on the existing structure, including the age of the structure, and building condition, and the floor area ratio and development potential remaining on the unbuilt portion of the site. Site 17 is adjacent to two other sites identified in the Sites Inventory, including the vacant parcel directly to the east, shown on **Image x. Site 17 Aerial View**. Site 17 is within a half mile to many resources including a grocery store, public park, senior center, two high schools, and an elementary school. The site is also near several commercial and residential projects in the City's development pipeline, signaling developer interest in the area.

The site has one existing structure on the southern boundary of the parcel and the remainder of the parcel remains largely undeveloped with an overall site floor area ratio of 0.0075. The existing structure is a 70-year-old residential unit built in 1951 that appears to be in need of rehabilitation, as shown on **Image xi, Site 17**. The 0.71-acre site remains largely undeveloped and has an unbuilt acreage of approximately 0.65 acres. Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 14 lower-income dwelling units (13 net new units).



Image x. Site 17 Aerial View

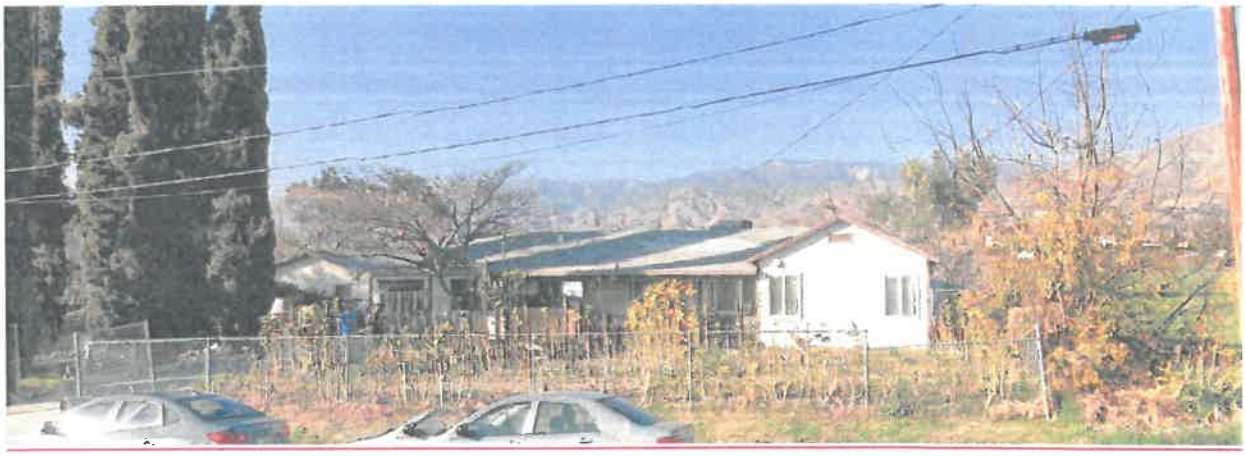


Image xi. Site 17

4.2.1.5 Site 18B (1191-241-17)

One of the parcels in Site 18B (see pervious **Image ii. Site 18B**, for an aerial image of the site) is identified as underutilized, largely based on the existing structure, including the age of the structure and building condition, and the floor area ratio and development potential remaining on the unbuilt portion of the Site. The Site is within a half mile to many resources including a grocery store, public park, senior

center, two high schools and an elementary school. They are also near several commercial and residential projects in the City's development pipeline, signaling developer interest in the area.

The 0.66-acre parcel has one existing structure on the south east corner of the parcel and the remainder of the parcel remains largely undeveloped with an unbuilt acreage of approximately 0.6 acres. The parcel has a floor area ratio of 0.046. The existing structure is a 56-year–old residential unit built in 1956 that appears to be in need of rehabilitation with a for sale sign, as shown on **Image xii, Site 18B**. In combination with the vacant parcel identified as part of Site 18B (1191-241-17), the site could accommodate approximately 21 lower-income dwelling units (20 net-new units) based on the realistic development potential and minimum density permitted in the R-4 zone.

See **Image ii. Site 18B Aerial View,** for an arial image of the Site.

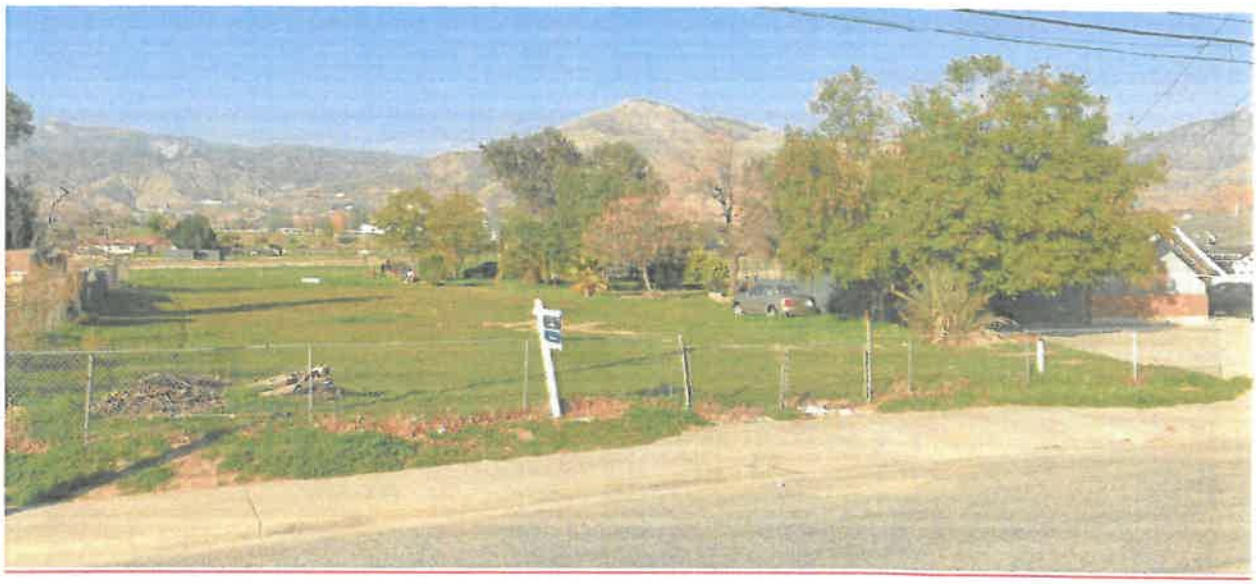


Image xii. Site 18B

4.2.1.6 Site 20 (1192-431-04)

Site 20, shown on **Image xiii. Site 20 Aerial View,** is identified as underutilized, based on the clearly dilapidated, vacant residential unit and extremely low floor area ratio. The parcel has one vacant, dilapidated residential unit that appears to be uninhabitable, as shown on **Image xiv., Site 20.** The structure was built in 1945 and has a floor area ratio of 0.014.

The 1.74-acre parcel has an unbuilt acreage of 1.7 acres. The property is owned by the Housing Authority. The City's Housing Authority is currently in the process of declaring the properties as surplus consistent with the provisions of Government Code Section 54221. The City's Housing Authority anticipates development of an affordable senior housing project through a ground lease with an affordable housing developer. The City anticipates the redevelopment of the parcel to generate 90 to 110 affordable senior housing units in combination with vacant Site 21 during the planning period. Site 20 has been included in the Sites Inventory with a realistic capacity to accommodate approximately 40 lower-income units.

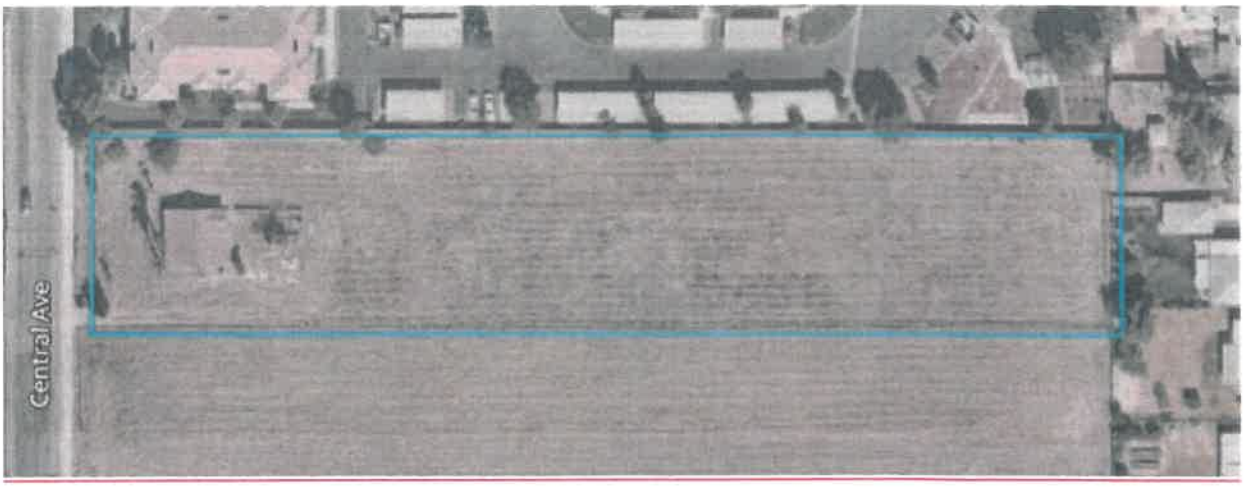


Image xiii. Site 20 Aerial View



Image xiv. Site 20

4.2.1.7 Site 22 (1192-581-03)

Site 22 is identified as underutilized, largely based on the existing structure, including the age of the structure, and building condition, and large portion of the lot that remains undeveloped, as shown on **Image xv. Site 22 Aerial View**. The site has one existing structure on the northern boundary of the parcel and the remainder of the parcel remains largely undeveloped with an overall site floor area ratio of 0.017. The parcel has one small residential unit with a for sale sign as shown on **Image xvi, Site 22**. The existing structure is a 73-year-old residential unit built in 1948.

The 1.88-acre site remains largely undeveloped and has an unbuilt acreage of approximately 1.78 acres. Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 38 lower-income dwelling units (37net new units).



Image xv. Site 22 Aerial View



Image xvi. Site 22

4.2.1.8 Sites 28 and 29

Sites 28 and 29 are located directly south of the Housing Authority property (Sites 20 and 21). Like the majority of sites identified as underutilized, both sites have older, residential units that appear to be in need of substantial rehabilitation on the front end of the lot, and as clearly shown on **Image xvii. Sites 28 and 29 Aerial View**, the majority of each parcel remains largely undeveloped as open dirt or grass fields.



Image xvii. Sites 28 and 29 Aerial View

Site 28 (1192-431-06)

The northern parcel on **Image xvii. Sites 28 and 29 Aerial View**, Site 28, has one existing 100-year–old residential unit built in 1920 with a floor area ratio of 0.016 that appears in need of rehabilitation as shown on **Image xviii. Site 28**. The approximately 2.14-acre site remains largely undeveloped and has an unbuilt acreage of approximately 2.08 acres. Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 43 lower-income dwelling units (42 net new units).



Image xviii. Site 28

Site 29 (1192-431-07)

The southern parcel on **Image xvii. Sites 28 and 29 Aerial View**, Site 28, has two small, existing residential units built in 1920. One of the units has 1 bedroom and the other has 2 bedrooms, and appear in need of repairs, as shown on **Image xix. Site 29**. Site 29 has a floor area ratio of 0.01. The approximately 2.7-acre site remains largely undeveloped and has an unbuilt acreage of approximately 2.6 acres. Based on the realistic development potential and minimum density permitted in the R-4 zone, the site could accommodate approximately 54 lower-income dwelling units (52 net new units).



Image xix. Site 29

See **Figure 3**, Lower-Income Sites, for an overview of lower-income sites. The vacant and underutilized sites identified in **Figure 3** are vacant and nonvacant sites that have been included in the sites inventory. It is not a comprehensive inventory of all vacant and nonvacant sites in the R-4 or Greenspot Specific Plan zoning designation.

Table 5. Lower-Income Sites Summary

Vacant Parcels	Underutilized Parcels	Total Sites	Total Acreage	Maximum Units Permitted	Realistic Capacity (Total Units)	Total Net-New Units	Income Level
~~22~~11	~~16~~27	~~31~~28	~~56.6~~93.6	~~1,698~~2,098	~~1,128~~1,261	~~1,104~~1,252	Lower-Income
See Sites 1–~~31~~ 29 in Table 11 for individual site and parcel details.							

Figure 3. Lower-Income Sites

4.3 Moderate-Income Sites

~~In addition to the 250 moderate-income units identified in Section 4.1, Planned, Approved, and Prospective Projects, t~~The City has identified capacity for a total of ~~257~~ 507 moderate-income units on vacant and underutilized sites. As such, the City has identified an adequate supply of land to accommodate the City's housing allocation of 471 moderate-income units.

The ~~257~~ 507 units on vacant and underutilized sites identified as having the capacity to accommodate moderate-income units are located on sites in the Multifamily (R-3), Mixed Use (MU), Two-Family (R-2), Corridor Residential (R-2C), ~~and~~ Planned Development (PD), Greenspot Village & Marketplace (SPR-006-001), and Mediterra Planned Development (PD 13-001) zoning districts. The R-3 zoning district provides for the development of multifamily attached residential dwelling units with enhanced amenities (common open space and recreation areas) at a maximum allowable density of 18 dwelling units per acre. The MU zoning district provides opportunities for an integrated mix of residential, retail, service, civic, entertainment, and office opportunities in attached or detached structures, developed as a single project or multiple related projects at a maximum allowable residential density of 18 dwelling units per acre. The R-2 District provides for residential development, including small-lot single-family detached, single-family attached, and multifamily residential uses and mobile homes, at a maximum allowable density of 12 dwelling units per acre. The R-2C District provides for small-lot single-family detached, single-family attached, and multifamily residential uses at a maximum allowable density of nine dwelling units per acre. Based on the permitted densities and range of permitted residential uses and neighborhood-serving amenities, the sites have been identified as appropriate to accommodate moderate-income housing.

As previously discussed in **Section 4.1.1**, Greenspot Village & Marketplace Specific Plan, and **Section 4.2**, Lower-Income Sites, the Greenspot Specific Plan includes three planning areas. Planning Area 2 permits residential uses, and Planning Area 3 permits a mix of commercial and residential uses. Based on the total number of residential units permitted by the Specific Plan and the two projects currently in the pipeline, there is a remaining capacity of 400 total units identified in Planning Areas 2 and 3. Due to the permitted densities, purely residential uses, range in housing types permitted, and vacant land available, the Sites Inventory assumes housing will be developed at a mix of lower- and moderate-income levels in Planning Areas 2 and 3. As such, 200 moderate-income units in the Greenspot Specific Plan have been identified in the Sites Inventory (see **Site 27D** in **Table 11**, Sites Inventory Table). The remaining 200-unit capacity has been identified as appropriate to accommodate lower-income units (see **Section 4.2**, Lower-Income Sites).

Mediterra is a planned development community (PD 13-001) off Greenspot Road. As discussed in **Section 4.1.2**, Vista Verde at Mediterra, Mediterra primarily allows for low-density residential development between 2.1 to 6 dwelling units per acre and medium-density development between 4 to 12 dwelling units per acre. Considering the total number of residential units permitted in the Mediterra plan area and the Vista Verde at Mediterra project currently in the pipeline, there is a remaining capacity of 167 units identified in the Mediterra Planned Development. Based on the range of medium and low densities permitted and the range in housing types permitted, the Sites Inventory assumes housing will be developed at a mix of moderate- and above -moderate–income levels. As such, 50 moderate-income units in the Mediterra Planned Development have been included in the Sites Inventory (see **Site 231E** in **Table 11**, Sites Inventory Table). The remaining 117-unit capacity has been

identified as appropriate to accommodate above moderate-income units (see **Section 4.4**, Above Moderate-Income Sites).

Approximately 172 acres of the City are in the R-3, MU, R-2, or R-2C zoning designations. However, approximately 130 acres have existing, multifamily residential uses. As such, the sites analysis largely focuses on the remaining vacant parcels. Five moderate-income sites were also identified on parcels in the PD zoning designation. In addition to the combined 250 moderate-income units identified in the Greenspot Specific Plan and Mediterra Planned Development, ~~A total of~~ 35 sites in the in the R-3, MU, R-2, R-2C, and PD zones with 257 units on approximately 28.5 total acres have been included in the sites inventory. The unit calculations are based on the realistic residential development potentials included in **Table 2**, Density Assumptions by Zone. **Table 6** provides a summary of all vacant and underutilized moderate-income sites in the R-3, MU, R-2, R-2C, ~~and~~ PD, Greenspot Specific Plan and Mediterra Planned Development zoning designations identified in the sites inventory, including ~~30~~ 38 vacant parcels and 5 underutilized parcels making up a total ~~35~~ 37 sites. All of the underutilized parcels identified have structures built over 70 years ago, and the average year of construction for all underutilized parcels is 1936. Although four of the underutilized sites have existing residential uses, only one of the sites has two dwelling units and the other three have single-family homes with single dwelling units on large parcels, and the average floor-area-ratio for all underutilized parcels included is 0.03.

See **Figure 4**, Moderate-Income Sites, for an overview of moderate-income sites. The vacant and underutilized sites identified in **Figure 4** are vacant and nonvacant sites that have been included in the sites inventory. It is not a comprehensive inventory of all vacant and nonvacant sites in the R-3, MU, R-2, R-2C, ~~and~~ PD, Greenspot Specific Plan and Mediterra Planned Development zoning designations.

Table 6. Moderate-Income Sites Summary

Vacant Parcels	Underutilized Parcels	Total Sites	Total Acreage	Maximum Units Permitted	Realistic Capacity (Total Units)	Total Net-New-Units	Income Level
~~30~~38	5	~~35~~37	82.9	~~356~~923	~~257~~507	~~252~~502	Moderate-Income
See Sites 27D, 30–64, and 231E~~32–66~~ in Table 11 for individual site and parcel details.							

Figure 4. Moderate-Income Sites

4.4 Above Moderate-Income Sites

In addition to the ~~863~~ 752 above moderate-income units identified in **Section 4.1**, the City has identified capacity for ~~561~~ 635 above moderate-income units on vacant and underutilized sites. With a total of ~~1,427~~1,387 above moderate-income units, the City has identified an adequate supply of land to accommodate the City's housing allocation of 1,014 above moderate-income units.

The ~~561~~ 635 units on vacant and underutilized sites identified as having the capacity to accommodate above moderate-income units are located on sites in the Single-Family (R-1), Village Residential (VR), East Highland Village District (EHV), ~~and~~ Agricultural Equestrian District (A/EQ), and Mediterra Planned Development (PD 13-001) zoning districts.

The R-1 zoning district provides for the development of single-family residential, small lot single-family detached, and mobile homes at a maximum allowable density of six dwelling units per acre. The VR zoning districts is intended to preserve and enhance the character of the historic townsite while permitting new development and the rehabilitation and reuse of existing structures at a maximum allowable density of six dwelling units per acre. The EHV zoning district provides for small-lot single-family residential detached housing with a maximum allowable density of six dwelling units per acre. The A/EQ zoning district provides for development of low-density, large-lot, single-family detached residential dwelling units at a maximum allowable density of two dwelling units per acre. Based on the lower densities and residential uses permitted, the sites have been identified as appropriate to accommodate above moderate-income housing.

As previously detailed in **Section 4.1.2**, Vista Verde at Mediterra, and **Section 4.3**, Moderate-Income Sites, Mediterra primarily allows for low- and medium-density residential development. Taking into account the total number of residential units permitted in the Mediterra plan area and the project currently in the pipeline, there is a, a remaining capacity of 167 units identified in the Mediterra Planned Development. Based on the range of medium and low densities permitted and the range in housing types permitted, the Sites Inventory assumes housing will be developed at a mix of moderate- and above -moderate-income levels. As such, 117 above moderate-income units in the Mediterra Planned Development have been included in the Sites Inventory (see **Site 231E** in **Table 11**, Sites Inventory Table). The remaining 50-unit capacity has been identified as appropriate to accommodate moderate-income units (see **Section 4.3**, Moderate-Income Sites).

The sites analysis largely focuses on vacant parcels in the R-1, VR, EHV, and A/EQ zoning designations. One above moderate-income site was also identified on a parcel in the PD zoning designation. In addition to the 117 above moderate-income units identified in the Mediterra Planned Development, ~~a total of 166~~ 164 sites with ~~561~~ 518 units on approximately ~~135~~ 126 total acres have been included in the Sites Inventory based on the realistic residential development potentials included in **Table 2**, Density Assumptions by Zone. **Table 7** provides a summary of all vacant and underutilized above moderate-income sites in the R-1, VR, EHV, A/EQ, ~~and~~ PD, and Mediterra Planned Development zoning designations identified in the Sites Inventory, including ~~161~~ 163 vacant parcels and ~~45~~ underutilized parcels making up a total ~~166~~ 165 sites. ~~Only one of the underutilized parcels has a residential unit, which was built in 1952 and has an FAR of 0.01~~The existing uses on the underutilized parcels include one old, nonresidential structure in need of rehabilitation, one old shed, and one older commercial building built in 1964 with a FAR of 0.0066. In addition, ~~all five~~the three underutilized parcels with existing

structures are being considered by the City for a rezone. While the rezone is not part of the Housing Element, the City is separately considering rezoning Sites 149, 150~~–152~~ and 218–228~~220–230~~ identified in the Sites Inventory from their current R-1 zoning designation to a PD zoning designation to provide a greater degree of design and land use flexibility for future development opportunities.

See **Figure 5**, Above Moderate-Income Sites, for an overview of above moderate-income sites. The vacant and underutilized sites identified in **Figure 5** are vacant and nonvacant sites that have been included in the sites inventory. It is not a comprehensive inventory of all vacant and nonvacant sites in the R-1, VR, EHV, A/EQ, ~~and~~ PD, and Mediterra Planned Development zoning designations.

Table 7. Above Moderate-Income Sites Summary

Vacant Parcels	Underutilized Parcels	Total Sites	Total Acreage	Maximum Units Permitted	Realistic Capacity (Total Units)	Total Net-New-Units	Income Level
~~161~~163	~~5~~4	16~~5~~6	~~135.3~~1 57.8	~~788~~873	~~561~~635	~~560~~635	Above Moderate-Income
See Sites 65–231E~~67–232~~ in Table 11 for individual site and parcel details.							

Figure 5. Above Moderate-Income Sites

4.5 Accessory Dwelling Unit Projection

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) to be developed within the planning period. The number of ADUs and JADUs that can be credited toward potential development must be based on the following factors:

- ADU and JADU development trends since January 2018
- Community need and demand for ADUs and JADUs
- Resources and incentives available to encourage their development
- The availability of ADUs and JADUs for occupancy
- The anticipated affordability of ADUs and JADUs

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these units in cities across California. ADU and JADU production is an ideal strategy for producing needed housing while capitalizing on existing infrastructure, such as water and sewer. Additionally, this is often a strategy that is more easily accepted by stakeholders who may be resistant to change because these units provide a form of "unseen" density that is palatable to many.

From 2018 through 2020, eight ADUs were permitted in the City. **Table 8** details recent ADU and JADU development in the City.

Table 8. Accessory Dwelling Unit and Junior Accessory Dwelling Unit Development Trends

Year	Permitted Units
2018	3
2019	2
2020	5

Source: City of Highland, 2021. Permit Listing Activity Report, 2018–2020.

Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue upward. To account for this increased potential, this sites analysis used the trends in ADU construction since January 2018 to estimate new production, which averages 2.66 ADUs per year. Based on the local incentives and ADU and JADU trends since January 2018, a conservative estimate of the number of units to be produced under this approach is 4 units each year during the planning period (June 30, 2021, to October 15, 2029), for a total of 33 units.

In addition to calculating the expected number of ADUs and JADUs to be developed within the planning period, the sites analysis must calculate the anticipated affordability of ADUs and JADUs to determine which RHNA income categories they should be counted toward. To facilitate the ADU affordability assumptions for jurisdictions, SCAG conducted the SCAG Regional Accessory Dwelling Unit Affordability Analysis.[4] As part of the analysis, SCAG conducted a survey of rents of 150 existing ADUs from April

[4] SCAG (Southern California Association of Governments). 2020. "SCAG Regional Accessory Dwelling Unit Affordability Analysis." https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527.

through June 2020. Efforts were made to reflect the geographic distribution, size, and other characteristics of ADUs across counties and subregions.

SCAG concluded that 22.7 percent of ADUs were affordable to very low-income households. Based on these assumptions, of the total 33 ADUs that are projected to be built during the planning period, 8 are estimated to be affordable to very low-income households, 11 to low-income households, 11 to moderate-income households, and 3 to above moderate-income households. **Table 9** shows the assumptions for ADU affordability based on the SCAG survey for San Bernardino/Riverside Counties.

Table 9. Estimated Affordability of Projected ADUs 2021–2029

Income Level	Percent of ADUs	Projected Number of ADUs
Very Low-Income	22.7%	8
Low-Income	34.8%	11
Moderate-Income	34.8%	11
Above Moderate-Income	7.7%	3
Total	**100%**	33

Source: SCAG (Southern California Association of Governments). 2020. "SCAG Regional Accessory Dwelling Unit Affordability Analysis." https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527.
ADU = accessory dwelling unit

In coordination with the updated policies and programs in the Housing Element and the City's ongoing efforts to promote the development of ADUs and JADUs, it is likely that these units will be produced at a higher rate.

5 Summary of Capacity to Accommodate the RHNA

The City of Highland is a growing community San Bernardino County. Although the western portion of the City (west of Interstate 210) is largely built-out, large amounts of vacant land remain in the eastern portions of the City with the possibility of providing new housing opportunities. There are also opportunities for ADUs and for the redevelopment of underutilized sites that meet density requirements, have an aging structure, and have a low floor to area ratio (i.e., low ratio of a building's total floor area to the size of the piece of land upon which it is built). The identification of these sites paired with the programs of the Housing Element will ensure that the City can realistically meet the RHNA targets at all income levels for the 6th Cycle.

Table 10 provides a summary of total residential capacity included in the final sites inventory compared to the City's 6th Cycle RHNA. As shown in **Table 10**, the City has a total capacity for ~~1,347~~1,280 lower-income units, 518 moderate-income units, and ~~1,427~~ 1,390 above moderate-income units within the residential pipeline of projects, vacant and underutilized sites, and through the expected number of ADUs and JADUs, which is sufficient capacity to accommodate the RHNA of 2,513 units.

A site-by-site overview for all sites identified in this sites inventory is included in **Table 11**. The overview includes each parcel's Assessor's Parcel Number; acres; potential number of units under the realistic capacity assumptions; income level; and, if applicable, existing use, age of building, and floor area ratio.

Table 10. Summary of Residential Capacity Compared to 6th Cycle RHNA by Income, City of Highland, June 30, 2021 through October 15, 2029				
Category	**Total Units**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**
RHNA	2,513	1,028	471	1,014
Pipeline Residential Development Credited Toward RHNA	~~1,313~~752	~~—~~200	~~—~~250	~~863~~752
Vacant and Underutilized Site Capacity	~~1,946~~2,403	~~1,128~~1,261	~~257~~507	~~561~~635
Potential Accessory Dwelling Units	33	19	11	3
Total Capacity	~~3,292~~3,188	~~1,347~~1,280	518	~~1,427~~1,390
Total Net-New-Units	~~3,257~~3,174	~~1,323~~1,271	513	~~1,421~~1,390
Total Capacity Surplus (+)/ Deficit (–)	—	+~~295~~243	+42	+~~407~~376

RHNA = Regional Housing Needs Allocation

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Lower-Income Sites									
~~Yes~~	~~1~~	~~0278-121-41~~	~~0.67~~	~~R-4~~	~~13~~	~~0~~	~~0~~	~~13~~	~~Underutilized, older residential unit, built 1948, floor area ratio (FAR) 0.05, IL ratio 0.05~~
Yes	~~2~~1	0278-121-42	3.06	R-4	61	0	0	61	Vacant
~~Yes~~	~~3~~	~~0278-131-34~~	~~0.82~~	~~R-4~~	~~16~~	~~0~~	~~0~~	~~16~~	~~Underutilized, 2 older residential units, built 1936~~
~~No~~	~~4A~~	~~0278-131-40~~	~~0.18~~	~~R-4~~	~~4~~	~~0~~	~~0~~	~~4~~	~~Vacant~~
Yes	~~4A~~2	0278-131-48	3.8	R-4	76	0	0	76	Underutilized, 2 nonresidential buildings built 1980, FAR 0.04, large dirt lot
~~Yes~~	~~5~~	~~0278-131-41~~	~~1.1~~	~~R-4~~	~~22~~	~~0~~	~~0~~	~~22~~	~~Underutilized, units built 1956, FAR 0.12~~
Yes	~~3~~6	0278-131-45	4.24	R-4	85	0	0	85	Vacant
Yes	~~4~~7	0278-131-46	0.71	R-4	14	0	0	14	Vacant
Yes	~~5~~8	0278-131-47	1.76	R-4	35	0	0	35	Vacant
Yes	~~6~~9	0278-201-26	0.93	R-4	19	0	0	19	Underutilized, vacant and extremely dilapidated building, FAR 0.08
Yes	~~7~~10	0278-201-27	0.53	R-4	11	0	0	11	Vacant
Yes	~~8~~11	0278-201-28	0.97	R-4	19	0	0	19	Vacant
~~No~~	~~12B~~	~~1191-181-02~~	~~0.17~~	~~R-4~~	~~3~~	~~0~~	~~0~~	~~3~~	~~Vacant~~
~~No~~	~~12B~~	~~1191-181-03~~	~~0.17~~	~~R-4~~	~~3~~	~~0~~	~~0~~	~~3~~	~~Vacant~~
~~No~~	~~12B~~	~~1191-181-04~~	~~0.17~~	~~R-4~~	~~3~~	~~0~~	~~0~~	~~3~~	~~Vacant~~
~~No~~	~~12B~~	~~1191-181-05~~	~~0.16~~	~~R-4~~	~~3~~	~~0~~	~~0~~	~~3~~	~~Vacant~~
No	~~9A12B~~	1191-181-06	0.16	R-4	3	0	0	3	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Yes	9A~~12 B~~	1191-181-07	4.56	R-4	91	0	0	91	Vacant
Yes	11~~13~~	1191-181-08	0.81	R-4	16	0	0	16	Vacant
Yes	12~~14~~	1191-241-09	1.46	R-4	29	0	0	29	Underutilized, 1 older residential unit, built 1979, FAR 0.03
Yes	13~~15~~	1191-241-10	4.91	R-4	98	0	0	98	Underutilized, 1 older residential unit, built 1955, FAR 0.01
Yes	14~~16~~	1191-241-12	4.92	R-4	98	0	0	98	Underutilized, 1 older residential unit, built 1963, FAR 0.007
Yes	15~~17~~	1191-241-13	0.67	R-4	13	0	0	13	Vacant
Yes	16~~18~~	1191-241-14	0.71	R-4	14	0	0	14	Vacant
Yes	17~~19~~	1191-241-15	0.71	R-4	14	0	0	14	Underutilized, 1 older residential unit, built 1951, FAR 0.05
Yes	18B~~2 0C~~	1191-241-17	0.66	R-4	13	0	0	13	Underutilized, 1 older residential unit, built 1965, FAR 0.06
Yes	18B~~2 0C~~	1191-241-18	0.41	R-4	8	0	0	8	Vacant
~~Yes~~	~~21~~	~~1191-241-19~~	~~0.76~~	~~R-4~~	~~15~~	~~0~~	~~0~~	~~15~~	~~Underutilized, 2 older residential units, built 1925, FAR 0.05~~
Yes	19~~22~~	1192-381-38	1.82	R-4	36	0	0	36	Vacant
Yes	20~~23~~	1192-431-04	1.74	R-4	~~35~~40	0	0	~~35~~40	Underutilized, 1 vacant and dilapidated residential unit, built 1945, FAR 0.01. Owned by the Housing Authority. The Housing Authority anticipates generating 90 to 110 affordable senior housing units during the Planning Period between Sites 20 and 21.

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Yes	21~~24~~	1192-431-05	1.98	R-4	40~~50~~	0	0	40~~50~~	Vacant. Owned by the Housing Authority. The Housing Authority anticipates generating 90 to 110 affordable senior housing units during the Planning Period on Sites 20 and 21.
Yes	22~~27~~	1192-581-03	1.88	R-4	38	0	0	38	Underutilized, 1 older residential unit, built 1948, FAR 0.02
Yes	23~~28~~	1192-601-02	1.77	R-4	35	0	0	35	Vacant
No	24~~29~~	1192-601-38	0.99	R-4	20	0	0	20	Vacant
Yes	25~~30~~	1192-601-39	0.52	R-4	10	0	0	10	Vacant
No	26~~31~~	1192-601-40	0.92	R-4	18	0	0	18	Vacant
No	27C	1201-351-14	2.35	PD	100	0	0	100	Vacant, Greenspot Specific Plan (SP) (PA 3)
No	27C	1201-351-15	1.5	PD	see above	0	0	see above	Vacant, Greenspot SP (PA 3)
No	27C	1201-351-16	1.92	PD	see above	0	0	see above	Vacant, Greenspot SP (PA 3)
No	27C	1201-351-28	6.9	PD	see above	0	0	see above	Vacant, Greenspot SP (PA 3)
No	27D	1201-341-29	4.4	PD	100	200	0	300	Vacant, Greenspot SP (PA 2)
No	27D	1201-341-30	0.1	PD	see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	27D	1201-341-33	20.65	PD	see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
No	27D	1201-341-59	0.02	PD	see above	see above	0	see above	Vacant, Greenspot SP (PA 2)

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
No	27C	1201-341-60	0.001	PD	see above	see above	0	see above	Vacant, Greenspot SP (PA 2)
Yes	2825	1192-431-06	2.14	R-4	43	0	0	43	Underutilized, 1 older residential unit, built 1920, FAR 0.02
Yes	2926	1192-431-07	2.7	R-4	54	0	0	54	Underutilized, 2 older residential units, built 1920, FAR 0.01
Moderate-Income Sites									
Yes	3032	0278-121-08	0.4	R-2	0	3	0	3	Vacant
Yes	3133	0278-121-12	0.13	R-2	0	1	0	1	Vacant
Yes	3234	0278-121-14	0.21	R-2C	0	1	0	1	Vacant
Yes	3335	0278-121-16	0.33	R-2C	0	2	0	2	Vacant
Yes	3436	0278-131-22	0.21	R-2	0	2	0	2	Vacant
Yes	3537	0278-262-26	1	R-2	0	8	0	8	Vacant
No	3638	0278-252-33	1.50	R-2	0	12	0	12	Underutilized, older residential unit, built 1900, FAR 0.07
No	3739	0278-252-34	1.46	R-2	0	12	0	12	Underutilized, 2 older residential units, built 1946, FAR 0.02
No	3840	0278-252-35	0.49	R-2	0	4	0	4	Underutilized, commercial building built 1948, FAR 0.03
No	3941	0278-262-20	0.98	R-2	0	8	0	8	Underutilized, older residential unit, built 1946, FAR 0.02
No	4042	0278-262-38	1.52	R-2	0	12	0	12	Underutilized, older residential unit, built 1944
Yes	4143	1191-141-28	0.21	PD	0	3	0	3	Vacant
Yes	4244	1191-141-31	0.21	PD	0	3	0	3	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Yes	4345	1191-181-49	0.56	PD	0	7	0	7	Vacant
Yes	4446	1191-191-11	1.9	R-2C	0	11	0	11	Vacant
Yes	4547	1191-201-12	4.94	R-2C	0	30	0	30	Vacant
Yes	4648	1191-231-02	0.55	R-2	0	4	0	4	Vacant
Yes	4749	1191-231-14	0.23	R-2	0	2	0	2	Vacant
Yes	4850	1191-341-32	0.17	R-3	0	2	0	2	Vacant
No	4951	1191-341-33	0.14	R-3	0	2	0	2	Vacant
No	5052	1191-381-01	4.56	MU	0	55	0	55	Vacant
No	5153	1191-381-02	1.06	MU	0	13	0	13	Vacant
No	5254	1191-501-77	0.47	MU	0	6	0	6	Vacant
Yes	5355	1192-011-09	0.19	R-2C	0	1	0	1	Vacant
Yes	5456	1192-011-10	0.18	R-2C	0	1	0	1	Vacant
Yes	5557	1192-011-11	0.18	R-2C	0	1	0	1	Vacant
Yes	5658	1192-011-12	0.18	R-2C	0	1	0	1	Vacant
Yes	5759	1192-011-33	0.09	R-2C	0	1	0	1	Vacant
Yes	5860	1192-011-34	0.18	R-2C	0	1	0	1	Vacant
No	5961	1192-071-08	0.22	R-2	0	2	0	2	Vacant
Yes	6062	1192-201-23	0.35	R-2	0	3	0	3	Vacant
Yes	6163	1192-411-06	0.42	R-2C	0	3	0	3	Vacant
Yes	6264	1200-431-02	2	PD	0	24	0	24	Vacant
Yes	6365	1200-431-04	1	PD	0	12	0	12	Vacant
No	6466	1201-011-08	0.32	MU	0	4	0	4	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Above Moderate-Income Units									
No	6567	0273-152-07	0.24	R-1	0	0	1	1	Vacant
Yes	6668	0273-253-17	0.33	R-1	0	0	1	1	Vacant
Yes	6769	0273-261-26	0.17	R-1	0	0	1	1	Vacant
Yes	6870	0273-261-27	1.04	R-1	0	0	4	4	Vacant
Yes	6971	0278-085-09	0.3	R-1	0	0	1	1	Vacant
Yes	7072	0278-101-27	0.16	R-1	0	0	1	1	Vacant
Yes	7173	0278-102-20	0.23	R-1	0	0	1	1	Vacant
Yes	7274	0278-111-16	0.11	R-1	0	0	0	0	Vacant
Yes	7375	0278-111-21	0.23	R-1	0	0	1	1	Vacant
Yes	7476	0278-113-02	0.45	R-1	0	0	2	2	Vacant
Yes	7577	0278-113-05	0.45	R-1	0	0	2	2	Vacant
Yes	7678	0278-113-14	0.23	R-1	0	0	1	1	Vacant
Yes	7779	0278-201-01	5.86	R-1	0	0	23	23	Vacant
Yes	7880	0278-201-09	0.24	R-1	0	0	1	1	Vacant
Yes	7981	0278-201-11	2.21	R-1	0	0	9	9	Vacant
Yes	8082	0278-201-12	2.27	R-1	0	0	9	9	Vacant
Yes	8183	0278-221-01	1.14	R-1	0	0	5	5	Vacant
Yes	8284	0278-221-05	0.23	R-1	0	0	1	1	Vacant
Yes	8385	0278-221-08	1.33	R-1	0	0	5	5	Vacant
Yes	8486	0278-221-22	0.69	R-1	0	0	3	3	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Yes	8587	0278-242-23	0.24	R-1	0	0	1	1	Vacant
Yes	8688	0278-243-04	0.23	R-1	0	0	1	1	Vacant
Yes	8789	0278-244-07	0.25	R-1	0	0	1	1	Vacant
Yes	8890	0278-252-29	0.32	R-1	0	0	1	1	Vacant
Yes	8991	0278-261-07	0.22	R-1	0	0	1	1	Vacant
Yes	9092	0278-261-15	0.11	R-1	0	0	0	0	Vacant
Yes	9193	0278-262-31	0.01	R-1	0	0	1	1	Vacant
Yes	9294	1191-341-16	1.51	R-1	0	0	6	6	Vacant
Yes	9395	1191-341-18	0.36	VR	0	0	1	1	Vacant
No	9496	1191-341-48	0.19	VR	0	0	1	1	Vacant
Yes	9597	1191-341-69	0.17	VR	0	0	1	1	Vacant
Yes	9698	1191-361-07	0.4	R-1	0	0	2	2	Vacant
Yes	9799	1191-371-29	0.16	R-1	0	0	1	1	Vacant
Yes	98100	1191-371-42	0.16	R-1	0	0	1	1	Vacant
Yes	99101	1191-381-03	0.18	R-1	0	0	1	1	Vacant
Yes	100102	1191-381-35	0.15	R-1	0	0	1	1	Vacant
Yes	101103	1191-381-36	0.15	R-1	0	0	1	1	Vacant
Yes	102104	1191-381-43	0.15	R-1	0	0	1	1	Vacant
Yes	1031	1191-381-55	0.15	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~05~~								
Yes	104~~1~~ ~~06~~	1191-411-08	0.18	R-1	0	0	1	1	Vacant
Yes	105~~1~~ ~~07~~	1191-421-03	0.17	R-1	0	0	1	1	Vacant
Yes	106~~1~~ ~~08~~	1191-421-19	0.17	R-1	0	0	1	1	Vacant
Yes	107~~1~~ ~~09~~	1191-421-24	0.15	R-1	0	0	1	1	Vacant
Yes	108~~1~~ ~~10~~	1191-471-03	0.19	VR	0	0	1	1	Vacant
Yes	109~~1~~ ~~11~~	1191-471-34	0.09	VR	0	0	1	1	Vacant
Yes	110~~1~~ ~~12~~	1191-471-55	0.14	VR	0	0	1	1	Vacant
Yes	111~~1~~ ~~13~~	1191-472-07	0.12	VR	0	0	1	1	Vacant
Yes	112~~1~~ ~~14~~	1192-011-28	0.07	R-1	0	0	1	1	Vacant
Yes	113~~1~~ ~~15~~	1192-011-41	0.15	R-1	0	0	1	1	Vacant
Yes	114~~1~~ ~~16~~	1192-021-04	0.1	R-1	0	0	0	0	Vacant
Yes	115~~1~~ ~~17~~	1192-021-09	0.32	R-1	0	0	1	1	Vacant
Yes	116~~1~~ ~~18~~	1192-041-33	0.69	R-1	0	0	3	3	Vacant
Yes	117~~1~~	1192-061-44	0.18	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~19~~								
Yes	1181 ~~20~~	1192-081-10	0.25	R-1	0	0	1	1	Vacant
No	1191 ~~21~~	1192-081-11	0.28	R-1	0	0	1	1	Vacant
No	1201 ~~22~~	1192-081-29	0.94	R-1	0	0	4	4	Vacant
Yes	1211 ~~23~~	1192-081-30	0.71	R-1	0	0	3	3	Vacant
No	1221 ~~24~~	1192-081-31	0.25	R-1	0	0	1	1	Vacant
Yes	1231 ~~25~~	1192-131-13	0.12	R-1	0	0	0	0	Vacant
Yes	1241 ~~26~~	1192-141-51	0.21	R-1	0	0	1	1	Vacant
Yes	1251 ~~27~~	1192-141-62	0.16	R-1	0	0	1	1	Vacant
Yes	1261 ~~28~~	1192-151-14	2.16	R-1	0	0	9	9	Vacant
Yes	1271 ~~29~~	1192-151-24	0.25	R-1	0	0	1	1	Vacant
Yes	1281 ~~30~~	1192-161-06	0.57	R-1	0	0	2	2	Vacant
Yes	1291 ~~31~~	1192-161-09	1.27	R-1	0	0	5	5	Vacant
Yes	1301 ~~32~~	1192-181-04	0.22	R-1	0	0	1	1	Vacant
Yes	1311 ~~1~~	1192-181-05	0.22	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~33~~								
Yes	132~~34~~	1192-201-12	0.44	R-1	0	0	2	2	Vacant
Yes	133~~35~~	1192-251-13	1.42	R-1	0	0	6	6	Vacant
Yes	134~~36~~	1192-251-18	0.17	R-1	0	0	1	1	Vacant
Yes	135~~37~~	1192-261-07	1.38	R-1	0	0	6	6	Vacant
Yes	136~~38~~	1192-261-08	0.16	R-1	0	0	1	1	Vacant
Yes	137~~39~~	1192-331-28	0.21	R-1	0	0	1	1	Vacant
Yes	138~~40~~	1192-331-29	0.23	R-1	0	0	1	1	Vacant
Yes	139~~41~~	1192-341-17	0.16	R-1	0	0	1	1	Vacant
Yes	140~~42~~	1192-341-18	0.16	R-1	0	0	1	1	Vacant
Yes	141~~43~~	1192-341-20	0.16	R-1	0	0	1	1	Vacant
Yes	142~~44~~	1192-341-23	0.16	R-1	0	0	1	1	Vacant
Yes	143~~45~~	1192-341-29	0.32	R-1	0	0	1	1	Vacant
Yes	144~~46~~	1192-341-49	0.16	R-1	0	0	1	1	Vacant
Yes	145~~1~~	1192-351-07	0.22	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~47~~								
Yes	1461 ~~48~~	1192-351-10	0.23	R-1	0	0	1	1	Vacant
Yes	1471 ~~49~~	1192-351-21	0.23	R-1	0	0	1	1	Vacant
~~No~~	~~150~~	~~1192-341-11~~	~~4.3~~	~~R-1~~	~~0~~	~~0~~	~~20~~	~~20~~	~~Underutilized, 1 home built 1952, FAR 0.0097~~
No	1491 ~~51~~	1192-361-45	1.8	R-1	0	0	9	9	Vacant
No	1501 ~~52~~	1192-361-47	2.18	R-1	0	0	11	11	Vacant
Yes	1511 ~~53~~	1192-371-12	0.09	R-1	0	0	1	1	Vacant
Yes	1521 ~~54~~	1192-371-21	0.14	R-1	0	0	1	1	Vacant
Yes	1531 ~~55~~	1192-371-26	0.09	R-1	0	0	1	1	Vacant
Yes	1541 ~~56~~	1192-391-76	0.17	R-1	0	0	1	1	Vacant
Yes	1551 ~~57~~	1192-421-25	0.21	R-1	0	0	1	1	Vacant
Yes	1561 ~~58~~	1192-471-21	1.95	R-1	0	0	8	8	Vacant
No	1571 ~~59~~	1192-501-04	0.17	R-1	0	0	1	1	Vacant
No	1581 ~~60~~	1192-531-48	0.2	R-1	0	0	1	1	Vacant
No	1591	1192-531-50	0.2	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~61~~								
No	160~~1~~ ~~62~~	1192-531-53	0.18	R-1	0	0	1	1	Vacant
No	161~~1~~ ~~63~~	1192-531-56	0.18	R-1	0	0	1	1	Vacant
No	162~~1~~ ~~64~~	1192-531-59	0.18	R-1	0	0	1	1	Vacant
No	163~~1~~ ~~65~~	1192-531-61	0.19	R-1	0	0	1	1	Vacant
No	164~~1~~ ~~66~~	1192-531-63	0.19	R-1	0	0	1	1	Vacant
No	165~~1~~ ~~67~~	1192-531-64	0.19	R-1	0	0	1	1	Vacant
No	166~~1~~ ~~68~~	1192-531-65	0.19	R-1	0	0	1	1	Vacant
No	167~~1~~ ~~69~~	1192-531-68	0.19	R-1	0	0	1	1	Vacant
No	168~~1~~ ~~70~~	1192-542-09	0.24	R-1	0	0	1	1	Vacant
No	169~~1~~ ~~71~~	1192-542-10	0.24	R-1	0	0	1	1	Vacant
No	170~~1~~ ~~72~~	1192-542-11	0.24	R-1	0	0	1	1	Vacant
No	171~~1~~ ~~73~~	1192-542-12	0.24	R-1	0	0	1	1	Vacant
No	172~~1~~ ~~74~~	1192-542-13	0.24	R-1	0	0	1	1	Vacant
No	173~~1~~	1192-542-14	0.24	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~75~~								
No	174~~1~~ ~~76~~	1192-542-17	0.25	R-1	0	0	1	1	Vacant
No	175~~1~~ ~~77~~	1192-542-18	0.2	R-1	0	0	1	1	Vacant
No	176~~1~~ ~~78~~	1192-542-19	0.19	R-1	0	0	1	1	Vacant
No	177~~1~~ ~~79~~	1192-542-20	0.19	R-1	0	0	1	1	Vacant
No	178~~1~~ ~~80~~	1192-542-21	0.19	R-1	0	0	1	1	Vacant
No	179~~1~~ ~~81~~	1192-542-22	0.19	R-1	0	0	1	1	Vacant
No	180~~1~~ ~~82~~	1192-542-23	0.19	R-1	0	0	1	1	Vacant
No	181~~1~~ ~~83~~	1192-542-24	0.19	R-1	0	0	1	1	Vacant
No	182~~1~~ ~~84~~	1192-542-25	0.19	R-1	0	0	1	1	Vacant
No	183~~1~~ ~~85~~	1192-542-30	0.19	R-1	0	0	1	1	Vacant
No	184~~1~~ ~~86~~	1192-542-31	0.19	R-1	0	0	1	1	Vacant
No	185~~1~~ ~~87~~	1192-542-32	0.19	R-1	0	0	1	1	Vacant
No	186~~1~~ ~~88~~	1192-542-33	0.19	R-1	0	0	1	1	Vacant
No	187~~1~~	1192-542-34	0.19	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~89~~								
No	188~~1~~ ~~90~~	1192-542-35	0.19	R-1	0	0	1	1	Vacant
No	189~~1~~ ~~91~~	1192-542-36	0.19	R-1	0	0	1	1	Vacant
No	190~~1~~ ~~92~~	1192-542-37	0.19	R-1	0	0	1	1	Vacant
Yes	191~~1~~ ~~93~~	1200-071-02	0.3	R-1	0	0	1	1	Vacant
Yes	192~~1~~ ~~94~~	1200-071-20	0.16	R-1	0	0	1	1	Vacant
No	193~~1~~ ~~95~~	1200-091-16	4.97	R-1	0	0	20	20	Vacant
No	194~~1~~ ~~96~~	1200-102-34	1.18	R-1	0	0	5	5	Vacant
Yes	195~~1~~ ~~97~~	1200-291-39	4.58	A/EQ	0	0	9	9	Vacant
Yes	196~~1~~ ~~98~~	1200-311-02	2.75	A/EQ	0	0	6	6	Vacant
No	197~~1~~ ~~99~~	1200-341-09	0.59	R-1	0	0	2	2	Vacant
Yes	198~~2~~ ~~00~~	1200-371-08	0.15	R-1	0	0	1	1	Vacant
Yes	199~~2~~ ~~01~~	1200-381-30	0.15	R-1	0	0	1	1	Vacant
Yes	200~~2~~ ~~02~~	1200-451-04	0.15	R-1	0	0	1	1	Vacant
Yes	201~~2~~	1200-551-41	1.66	A/EQ	0	0	3	3	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~03~~								
No	202~~04~~	1200-591-01	1.87	A/EQ	0	0	4	4	Vacant
No	203~~05~~	1201-021-09	1.97	R-1	0	0	8	8	Vacant
Yes	204~~06~~	1201-041-23	0.33	R-1	0	0	1	1	Vacant
Yes	205~~07~~	1201-041-57	0.27	R-1	0	0	1	1	Vacant
Yes	206~~08~~	1201-041-58	0.26	R-1	0	0	1	1	Vacant
Yes	207~~09~~	1201-041-59	0.26	R-1	0	0	1	1	Vacant
Yes	208~~10~~	1201-061-02	4.75	R-1	0	0	19	19	Vacant
No	209~~11~~	1210-201-02	0.21	R-1	0	0	1	1	Vacant
No	210~~12~~	1210-201-03	0.27	R-1	0	0	1	1	Vacant
No	211~~13~~	1210-201-12	0.2	R-1	0	0	1	1	Vacant
No	212~~14~~	1210-201-13	0.15	R-1	0	0	1	1	Vacant
No	213~~15~~	1210-202-14	0.21	R-1	0	0	1	1	Vacant
No	214~~16~~	1210-202-46	0.17	R-1	0	0	1	1	Vacant
No	215~~2~~	1210-202-47	0.17	R-1	0	0	1	1	Vacant

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~17~~								
No	2162 ~~18~~	1210-202-52	0.15	EHV	0	0	1	1	Vacant
No	2172 ~~19~~	1210-202-53	0.18	EHV	0	0	1	1	Vacant
Yes	2182 ~~20~~	1210-271-01	3.35	R-1	0	0	13	13	Underutilized, older nonresidential structure
No	2192 ~~21~~	1210-271-02	0.88	R-1	0	0	4	4	Vacant
Yes	2202 ~~22~~	1210-271-03	1.96	R-1	0	0	8	8	Underutilized, older shed
~~No~~	~~223~~	~~1210-271-07~~	~~4.65~~	~~R-2~~	~~0~~	~~0~~	~~23~~	~~23~~	~~Underutilized, 1 home built 1940, FAR 0.0088~~
No	2222 ~~24~~	1210-271-08	1.21	R-1	0	0	5	5	Vacant
No	2232 ~~25~~	1210-271-09	1.62	R-1	0	0	6	6	Vacant
No	2242 ~~26~~	1210-271-11	1.78	R-1	0	0	7	7	Vacant
No	2252 ~~27~~	1210-371-13	6.97	R-1	0	0	28	28	Vacant
No	2262 ~~28~~	1210-371-14	3.04	R-1	0	0	12	12	Vacant
Yes	2272 ~~29~~	1210-371-15	10.29	R-1	0	0	41	41	Underutilized vacant commercial structure, built 1964, FAR 0.0066
No	2282 ~~30~~	1210-371-16	10.2	R-1	0	0	41	41	Vacant
Yes	2292	1200-401-80	1.04	R-1	0	0	4	4	Vacant, pending project (La Praix)

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
	~~31~~								
No	2302~~32~~	1191-351-04	3.37	PD	0	0	15	15	Vacant, pending project for 15 single-family homes from Hispano Investors.
No	231E	0297-021-18	179 total	PD	0	50	117	167	Mediterra Approved Specific Plan (See Vista Verde at Mediterra for Phases 1 & 2 of development)
No	231E	0297-051-12	See above	PD	0	0	0	0	Mediterra Approved Specific Plan (See Vista Verde at Mediterra for Phases 1 & 2 of development)
No	231E	0297-051-16	See above	PD	0	0	0	0	Mediterra Approved Specific Plan (See Vista Verde at Mediterra for Phases 1 & 2 of development)
Planned, Approved, and Prospective Projects									
No	~~233~~232	1210-371-51	21.6	R-1	0	0	54	54	Underutilized, pending project (Kiel 54)
No	~~234~~233	0288-562-03	7.9	PD	0	0	46	46	Vacant, pending project (Highland Park)
~~No~~	~~235D~~	~~0297-021-18~~	~~179 total~~	~~PD~~	~~0~~	~~50~~	~~117~~	~~167~~	~~Vacant, pending project (Mediterra)~~
~~No~~	~~235D~~	~~0297-051-12~~	~~See above~~	~~PD~~	~~0~~	~~0~~	~~0~~	~~0~~	~~Vacant, pending project (Mediterra)~~
~~No~~	~~235D~~	~~0297-051-16~~	~~See above~~	~~PD~~	~~0~~	~~0~~	~~0~~	~~0~~	~~Vacant, pending project (Mediterra)~~
No	~~235D~~234F	0297-021-25	See above	PD	0	0	149	149	Vacant, pending project (Vista Verde at Mediterra)
No	234F~~235D~~	0297-021-26	See above	PD	0	0	0	0	Vacant, pending project (Vista Verde at Mediterra)
No	234F~~235D~~	0297-021-27	See above	PD	0	0	0	0	Vacant, pending project (Vista Verde at Mediterra)

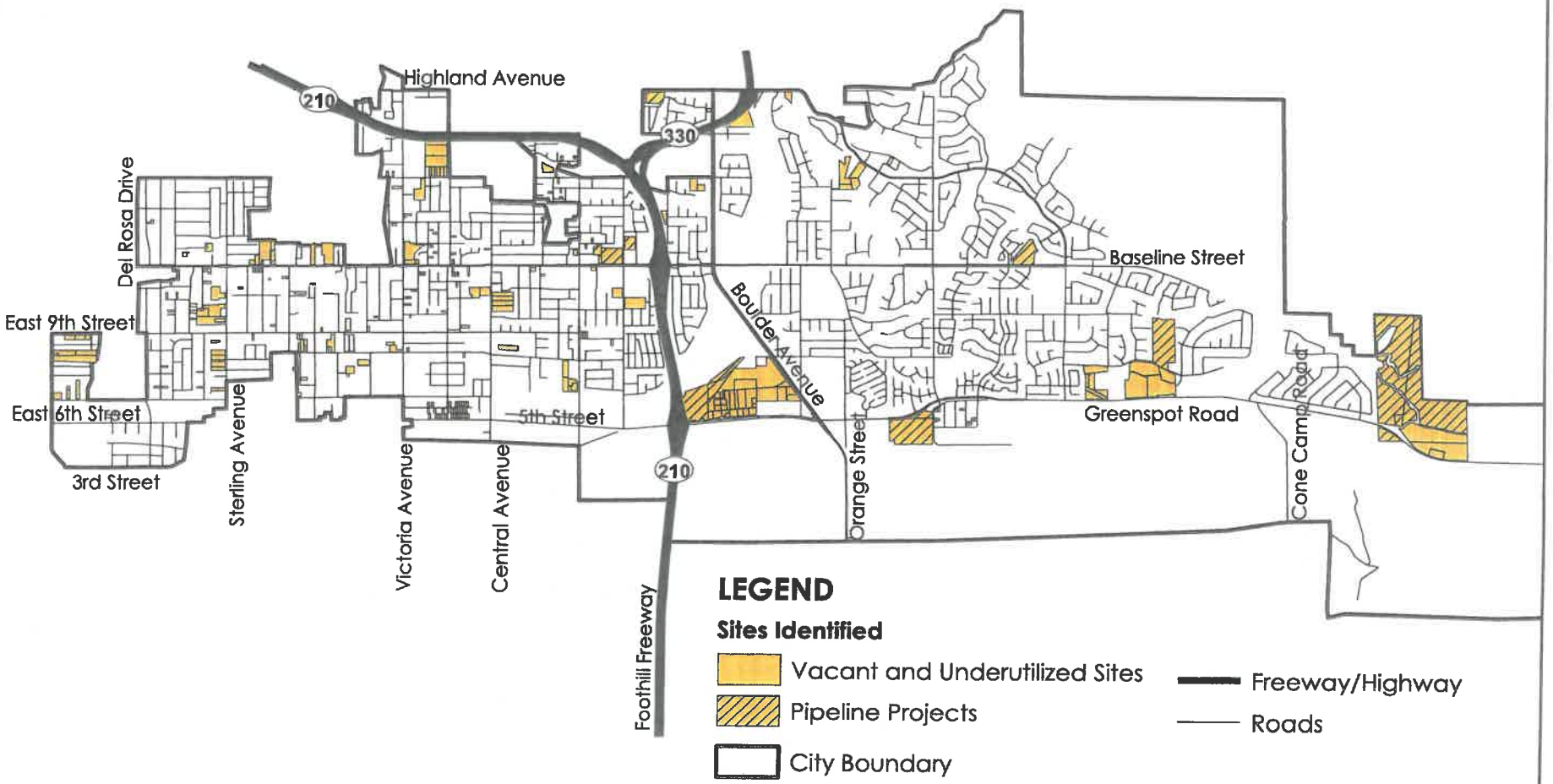
Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
No	234F~~2~~ ~~35D~~	0297-021-28	See above	PD	0	0	0	0	Vacant, pending project (Vista Verde at Mediterra)
Yes	~~236E~~2 35G	1201-401-02	22.97	PD	0	0	137	137	Vacant, pending project (Blossom Trails)
Yes	235G~~2~~ ~~36E~~	1201-431-61	2.41	PD	0	0	0	0	Vacant, pending project (Blossom Trails)
~~No~~	~~237F~~	~~1201-351-14~~	~~2.35~~	~~PD~~	~~100~~	~~0~~	~~0~~	~~100~~	~~Vacant, Greenspot Specific Plan (SP) (PA 3)~~
~~No~~	~~237F~~	~~1201-351-15~~	~~1.5~~	~~PD~~	~~see above~~	~~0~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 3)~~
~~No~~	~~237F~~	~~1201-351-16~~	~~1.92~~	~~PD~~	~~see above~~	~~0~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 3)~~
~~No~~	~~237F~~	~~1201-351-28~~	~~6.9~~	~~PD~~	~~see above~~	~~0~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 3)~~
No	~~238G~~2 36H	1201-331-01	—	PD	0	0	200	200	Vacant, ~~Greenspot SP~~ pending project (TREH Partners project in Greenspot SP)
No	236H~~2~~ ~~38G~~	1201-341-01	—	PD	0	0	0	0	Vacant, ~~Greenspot SP~~ pending project (TREH Partners project in Greenspot SP)
No	236H~~2~~ ~~38G~~	1201-341-08	—	PD	0	0	0	0	Vacant, ~~Greenspot SP~~ Pending project (TREH Partners project in Greenspot SP)
No	236H~~2~~ ~~38G~~	1201-341-09	—	PD	0	0	0	0	Vacant, ~~Greenspot SP~~ pending project (TREH Partners project in Greenspot SP~~)~~
~~No~~	~~239H~~	~~120134102~~	~~1.19~~	~~PD~~	~~100~~	~~200~~	~~0~~	~~300~~	~~Underutilized, Greenspot SP (PA 2); 1 residential unit built 1942, FAR 0.022~~
~~No~~	~~239H~~	~~120134103~~	~~1.49~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Underutilized, Greenspot SP (PA 2); 1 residential unit built 1940, FAR 0.032~~
~~Yes~~	~~239H~~	~~120135119~~	~~0.08~~	~~PD~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Underutilized, Greenspot SP (PA 2); 1 residential unit built 1942, FAR 0.07~~

Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
~~No~~	~~239H~~	~~120135120~~	~~0.68~~	~~PD~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Underutilized, Greenspot SP (PA 2); 1 residential unit built 1955, FAR 0.18~~
~~Yes~~	~~239H~~	~~120135121~~	~~0.41~~	~~PD~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Underutilized, Greenspot SP (PA 2); 1 residential unit built 1953, FAR 0.07~~
~~No~~	~~239H~~	~~120134104~~	~~1~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
~~No~~	~~239H~~	~~120134129~~	~~4.4~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
~~No~~	~~239H~~	~~120134130~~	~~0.1~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
~~No~~	~~239H~~	~~120134133~~	~~20.65~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
~~No~~	~~239H~~	~~120134159~~	~~0.02~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
~~No~~	~~239H~~	~~120134160~~	~~0.001~~	~~—~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
~~Yes~~	~~239H~~	~~120135122~~	~~0.02~~	~~PD~~	~~see above~~	~~see above~~	~~0~~	~~see above~~	~~Vacant, Greenspot SP (PA 2)~~
No	237~~I2~~ 40~~I~~	1191-191-06	1.95	R-4	0	0	60	60	Vacant, pending project (senior assisted living)
No	237~~I2~~ 40~~I~~	1191-181-01	0.30	R-4	0	0	see above	see above	Vacant, pending project (senior assisted living)
No	238J~~2~~ 41J	1200-381-43	2.08	MU	0	0	~~17~~21	~~17~~21	Vacant, pending project (Tractor Supply Company)
No	238J~~2~~ 41J	1200-381-05	6.96	MU	0	0	see above	see above	Vacant, pending project (Tractor Supply Company)
Yes	2392~~4~~ ~~2~~	1200-041-02	4.19	PD	0	0	~~49~~50	~~49~~50	Vacant, pending project (Crestwood Communities)

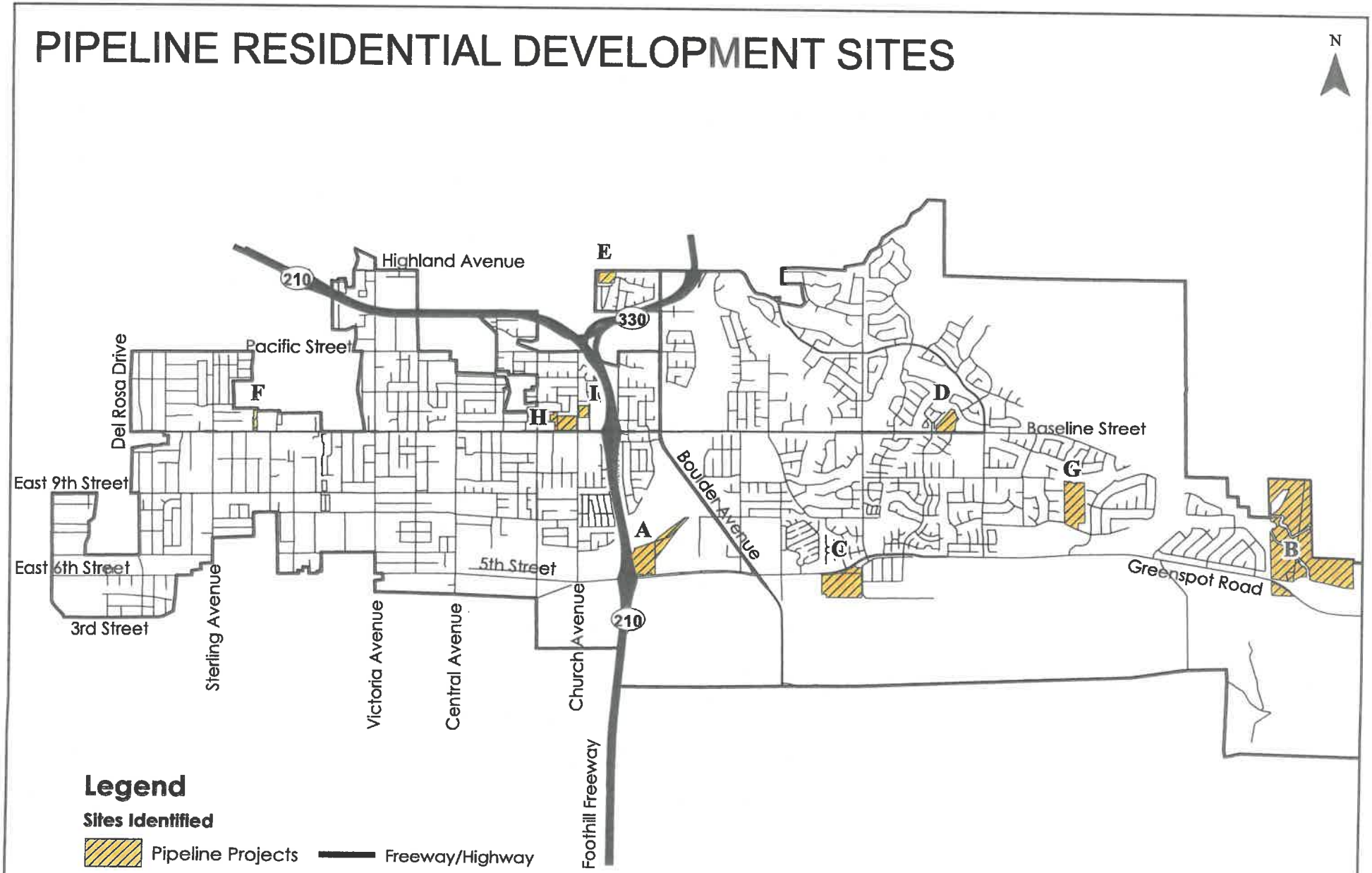
Table 11. Sites Inventory Table									
Included in Previous Cycle(s)	Site ID*	Assessor's Parcel Number	Acres	Zoning Designation	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Site Description
Yes	24024~~3~~	1200-421-34	2.9	MU	0	0	~~34~~35	~~34~~35	Vacant, pending project (~~Paseo Del Oro~~Highland Heights)
Total Units					~~1,328~~1,261	**507**	~~1,424~~1,387	~~2,259~~3,167	—
* Generally, a site is a parcel or a group of parcels that can accommodate a portion of the jurisdiction's Regional Housing Needs Allocation. All multi-parcel sites are denoted by a number and letter in their Site ID. All parcels belonging to one site have the same Site ID listed in this table.									

HIGHLAND 6TH CYCLE SITES INVENTORY

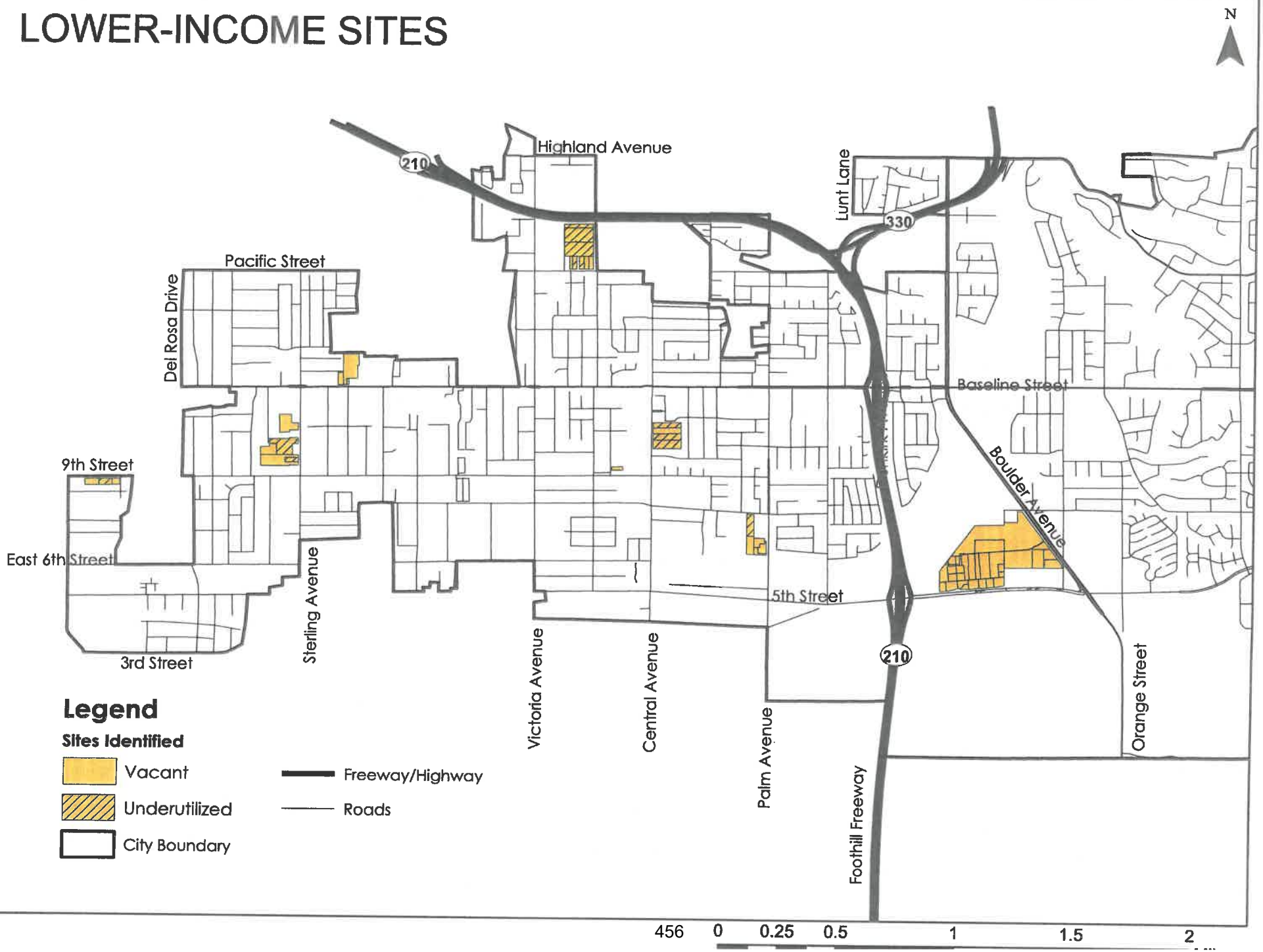
SELECTED SITES



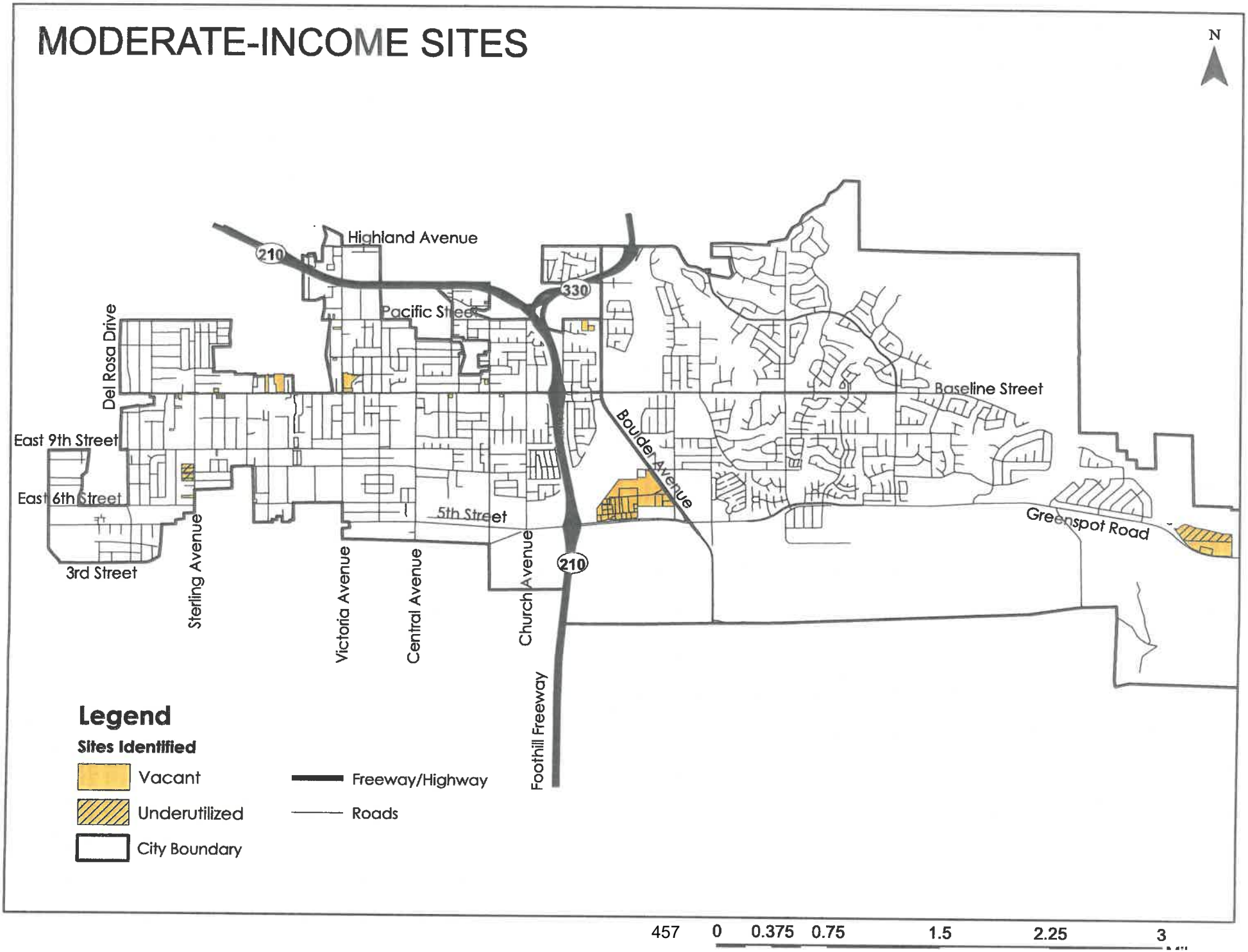
PIPELINE RESIDENTIAL DEVELOPMENT SITES



LOWER-INCOME SITES



MODERATE-INCOME SITES



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Table of Contents

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1.2 Community Outreach Workshops 1

1.3 Planning Commission and City Council Joint Session Public Meeting 2

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1.6 Public Comments 3

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Exhibit C


DUDEK
NOVEMBER 24, 1987
CITY OF HIGHLAND
City of Highland
Housing, and Public Health, Safety &,
Environmental Justice Elements
JOINT CITY COUNCIL/PLANNING COMMISION MEETING
JUNE 8, 2021

1


Meeting Overview
01 Introductions
02 Project Overview
03 Next Steps
04 Council/Commission Discussion

2

01 Introductions

3

Meet the Team

LAWRENCE MAINEZ
Community Development Director

KIM STATER
Assistant Community Development Director

SALVADOR QUINTANILLA
Associate Planner

DUDEK

ASHA BLEIER
Project Manager

ERIKA VAN SICKEL
Lead Planner

ELIZABETH DICKSON
Planner

4

4

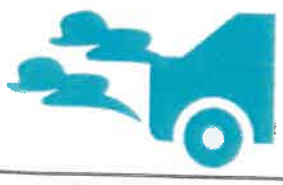
02 Project Overview

5

What is a SAFETY ELEMENT?

A set of goals, policies, and actions that address both natural and human caused hazards related to air pollution, extreme heat, flooding, earthquakes, hazardous materials, wildfires, and the potential role of climate change.



6

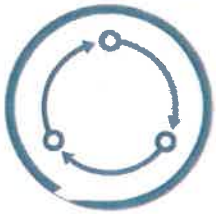
6

What is the purpose of the Safety Element?



Mitigation

- Reducing or stabilizing the hazard



Preparedness

- Readiness in the event of an emergency



Response

- Stabilizing an emergency event



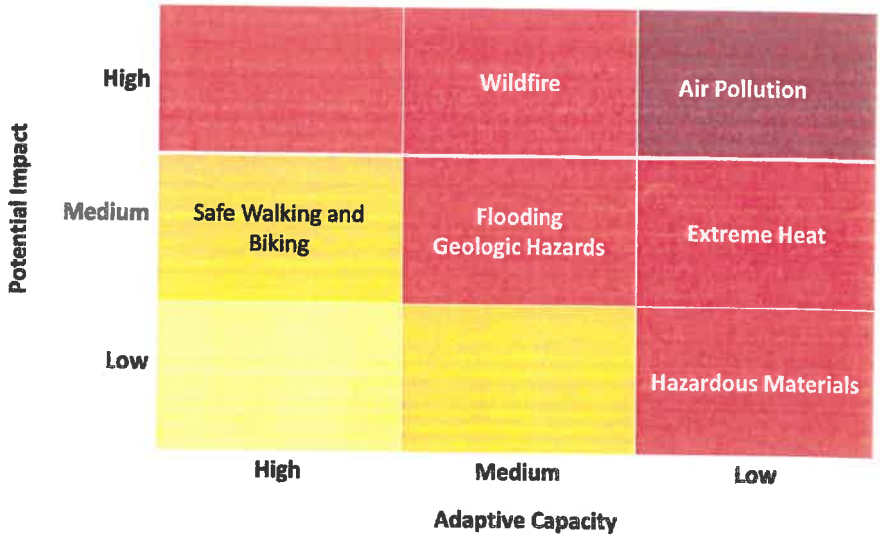
Recovery

- Steps to build back better after an event

7

7

What are Highland's Risks?



8

8

CIRCULATION ELEMENT Amendment

Three (3) Street Segments

Cone Camp Road Extension – elimination of the street segment through the Santa Ana River

Base Line – elimination of the street segment connecting from Red Hill to Alta Vista

Greenspot Road Extension to Bryant Street – modify this regional connector into a looping road, connecting back to Garnet Street Bridge

9

9

What is the ENVIRONMENTAL JUSTICE ELEMENT?

What is Environmental Justice?

The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of laws, regulations, and policies.

10

10

What is the ENVIRONMENTAL JUSTICE ELEMENT?

What is the purpose of the Environmental Justice plan?



Improve health, air quality, food choices, parks, safety, streets, sidewalks in environmental justice communities (EJCs).



Promote getting involved in your local government so you can affect change for your *neighborhood.*



Making improvements happen through programs.

11

11

Identifying Environmental Justice

Within the City's jurisdiction, EJCs are identified through a customized methodology incorporating statewide and community-level data:



Low-income communities with pollution burden score 75% or above.

Address wellness and equity for EJCs of the City.

Examine existing conditions for population characteristics, socioeconomic opportunity, environmental conditions, and health and vulnerability factors.

12

12

What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029)

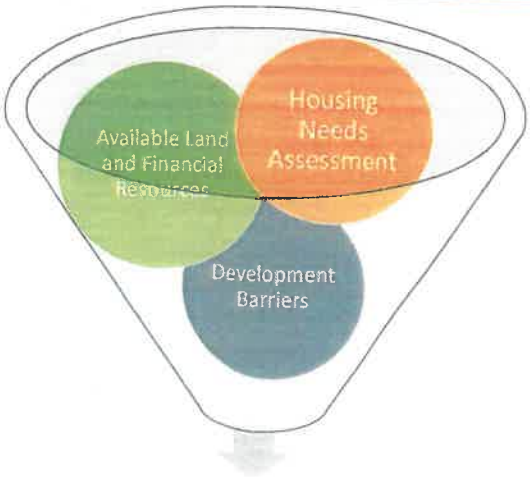


13

13

What are the components of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Analyze and further Fair Housing
- Identify sites available for housing
- Identify programs and actions to meet the needs
- Facilitate housing production on sites identified

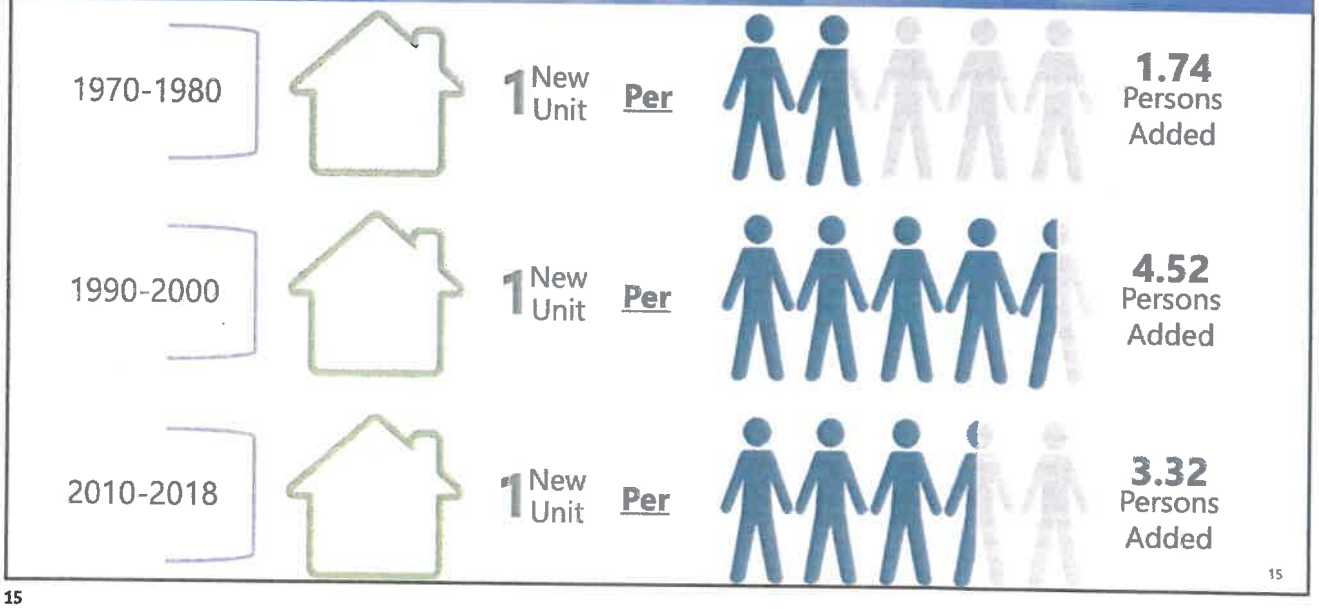


Housing Action Plan

14

14

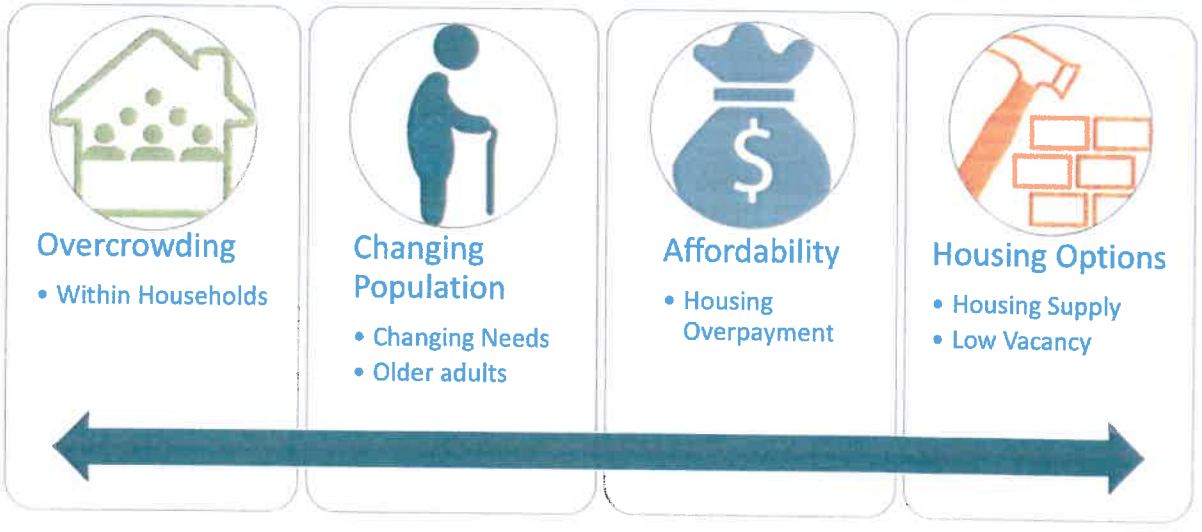
What does the data show?



15

15

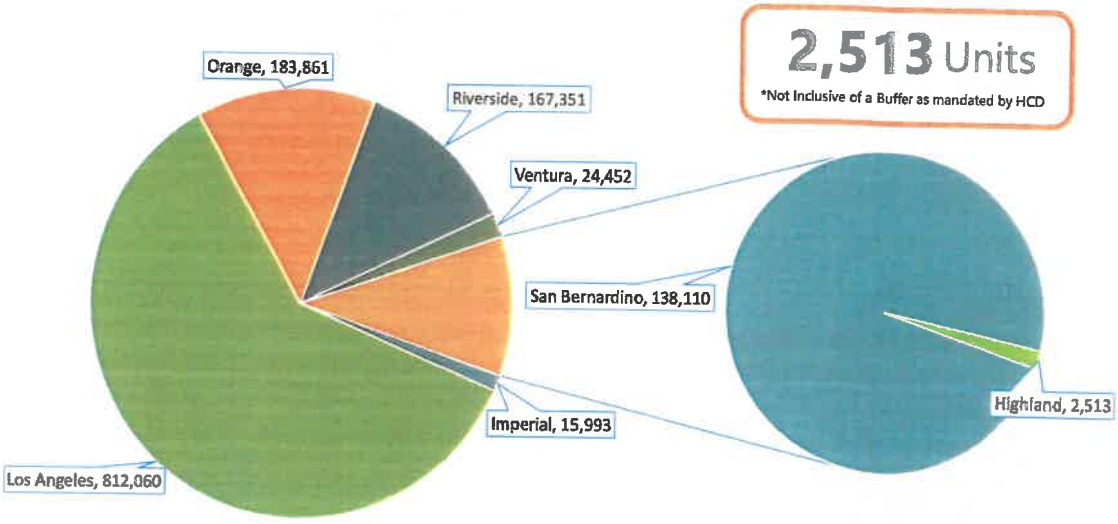
What does the data show?



16

16

How many housing units does Highland have to plan for?



17

17

Low- and Moderate-Income Households

2021 County AMI = $77,500

- **Lower-Income Households:** Total annual income is 80% or less of the AMI.
  - Those that earn $63,200 or less annually
- **Moderate-Income Households:** Total annual income is between 80-120% of AMI.
  - Those that earn no more than $93,000 annually.

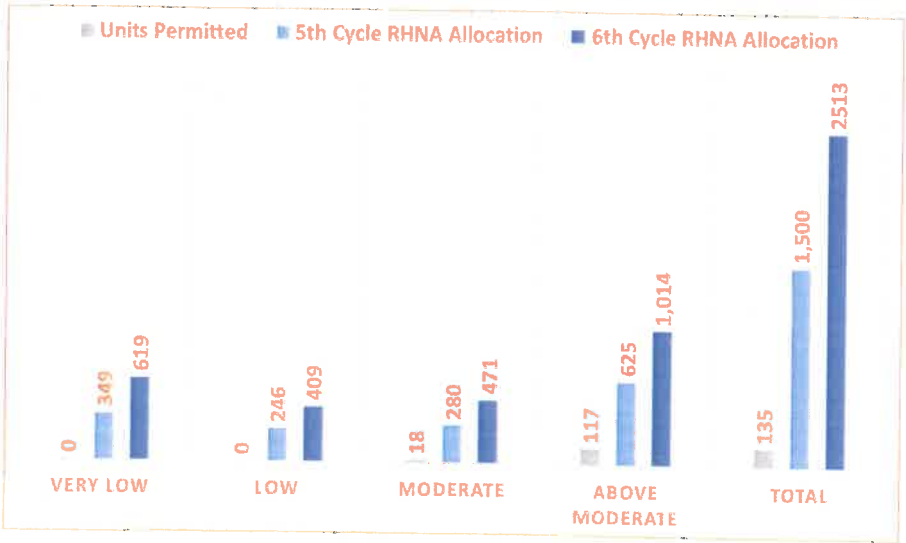
18

18

5th Cycle RHNA Progress
Data Reported 2014-2019

5th Cycle Average Units Permitted Per Year = 22.5

6th Cycle Average Units Permitted Per Year Needed = 314



19

19

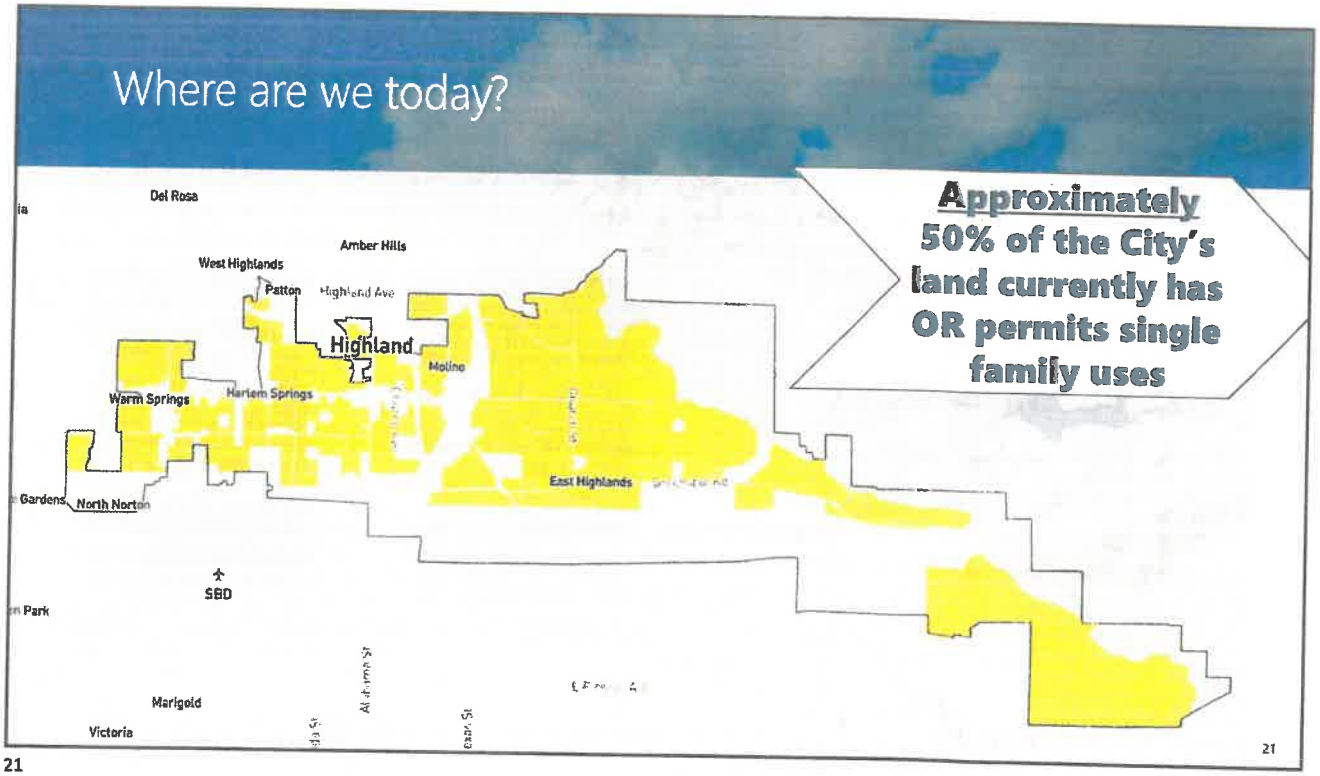
Addressing the RHNA Allocation

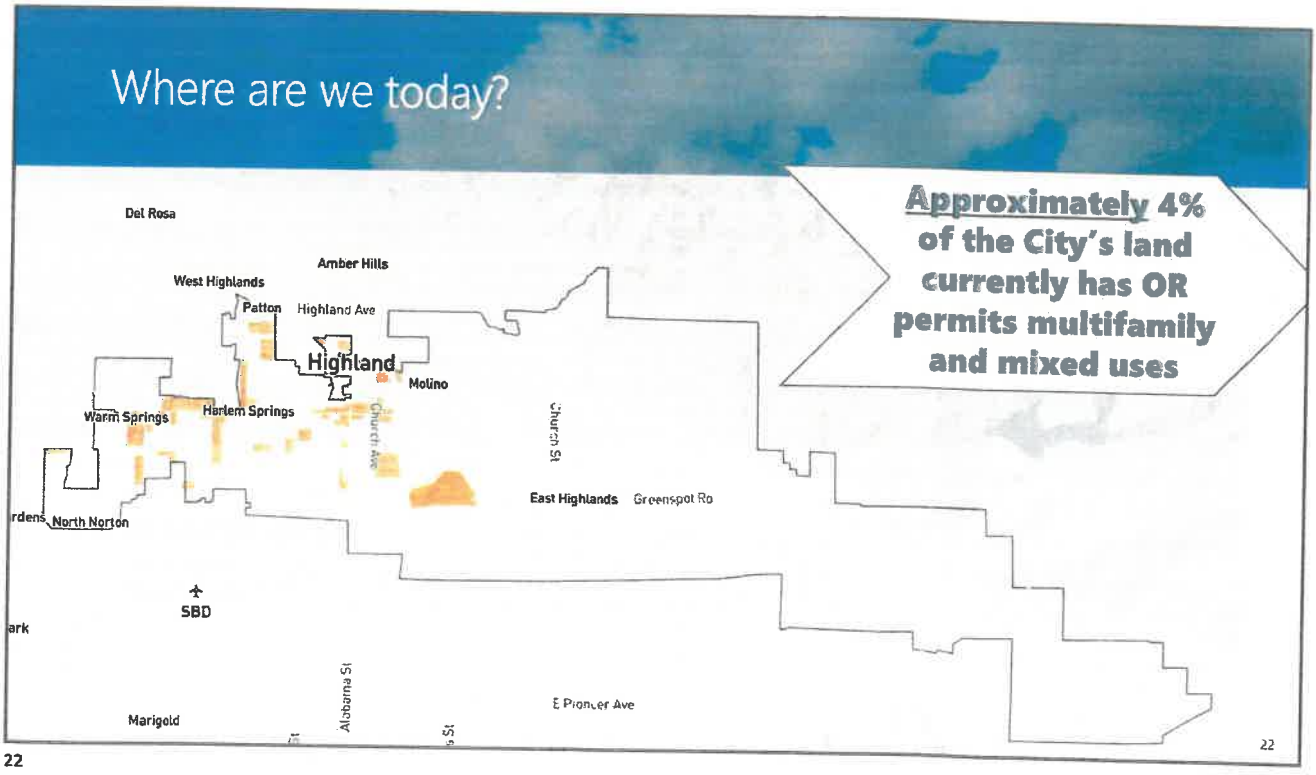
Site Inventory Requirements

- Vacant Sites/Underutilized
- Size Constraints - 0.5 acres – 10 acres
- IL Ratio – Structure Value compared to Land Value
- Building Age – 1970's and older
- Minimum Densities – 30 du/ac for lower-income sites
- Realistic Capacity – must be based either on:
  - Past density trends near max allowable density in zone;
  - Or Minimum densities

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Where are we today?
Approximately 50% of the City's land currently has OR permits single family uses
Del Rosa
Amber Hills
West Highlands
Patton
Highland Ave
Highland
Molino
Warm Springs
Harlem Springs
East Highlands
Gardens
North Norton
SBD
Marigold
Victoria
21


Where are we today?
Approximately 4% of the City's land currently has OR permits multifamily and mixed uses
Del Rosa
Amber Hills
West Highlands
Patton
Highland Ave
Highland
Molino
Warm Springs
Harlem Springs
Church St
East Highlands
Greenspot Rd
North Norton
SBD
Alabama St
E Pioneer Ave
Marigold
22

Tools in the Toolbox



Regulations

- By-Right Processing
- Objective Design Standards
- Not Net Loss

Incentives

- Density Bonus
- Streamlining
- Regulatory Relief

23

03 Next Steps

Next Steps

We are here in the process...



CONDUCTING OUTREACH



PLAN PREPARATION



PUBLIC REVIEW

25

25

Approval Steps



HCD REVIEW



ADDRESS COMMENTS



PLAN ADOPTION



FINAL CERTIFICATION

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04 Council/Commission Discussion

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Any questions or comments?



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Questions for Council/Commission

What have you heard from the community are the biggest **safety** issues?

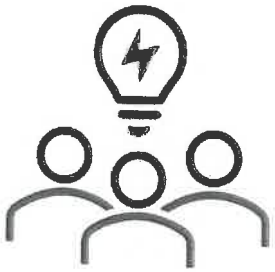


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Questions for Council/Commission

What have you heard from the community are the biggest **housing** needs and priorities?



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Questions for Council/Commission

What specific barriers, challenges, or factors do you think adversely affect housing production in Highland?



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DUDEK

Thank You

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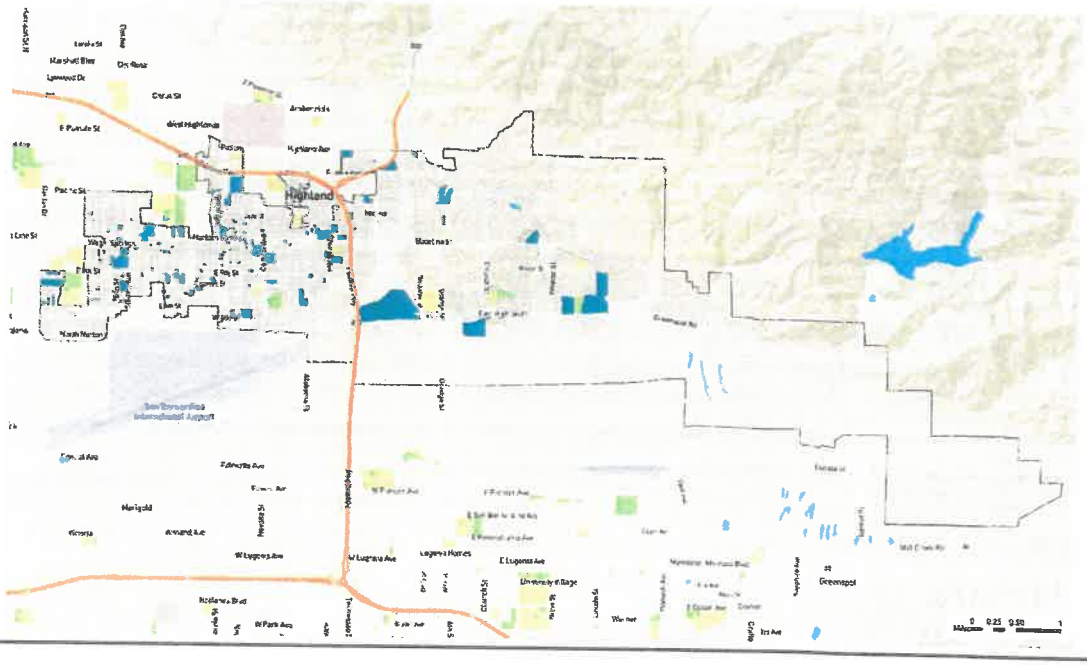
What Happens If a Jurisdiction Does Not Comply with State Law?

- Pro-Housing Default Rule goes into effect
- General Plan deemed inadequate and invalid
- Limited access to state funding
- Private party lawsuits
- Court mandated compliance
- Suspension of local control of planning & building decisions
- Court approval of housing developments

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Sites Inventory Mapping

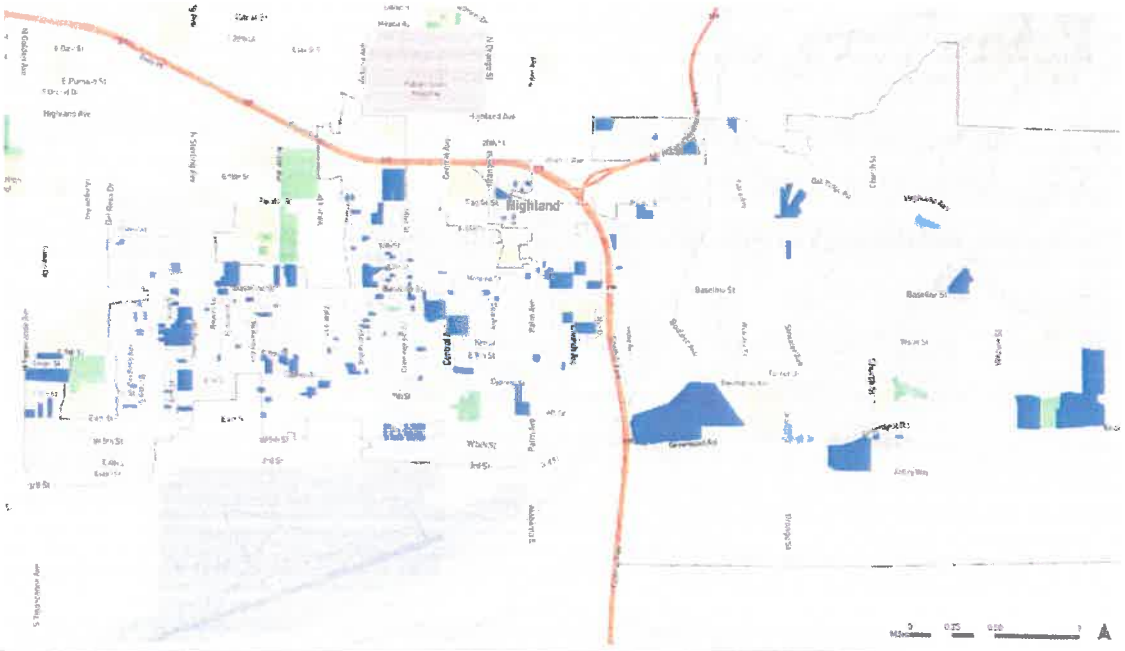


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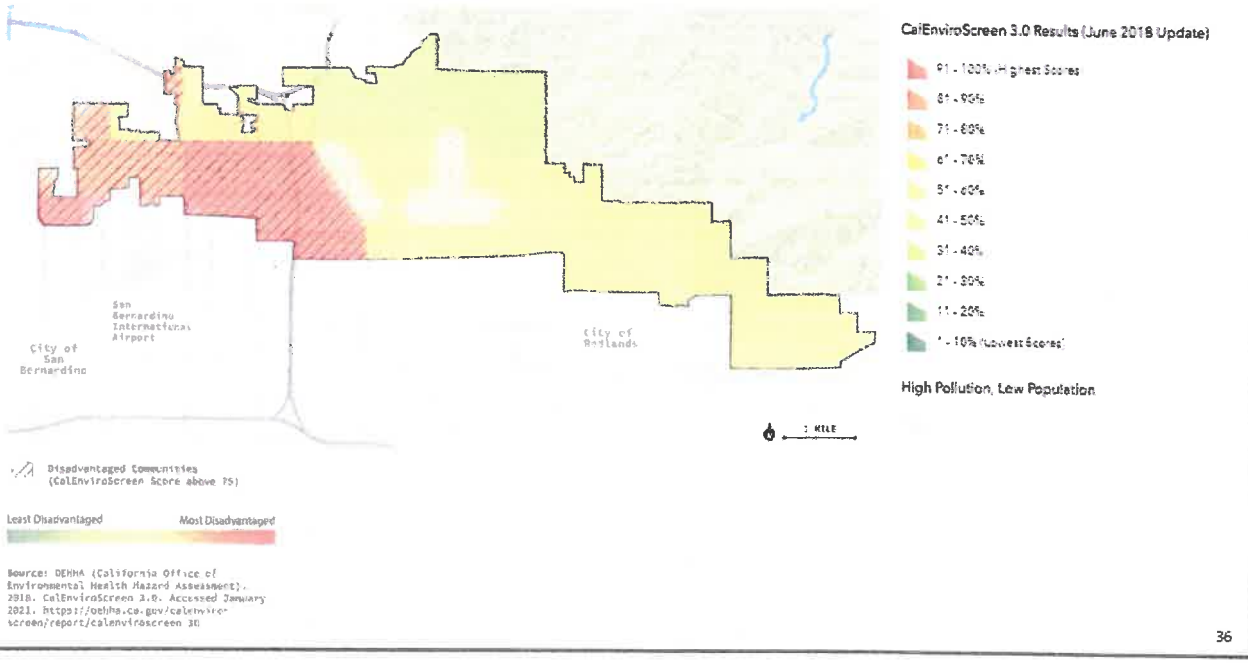
Sites Inventory Mapping



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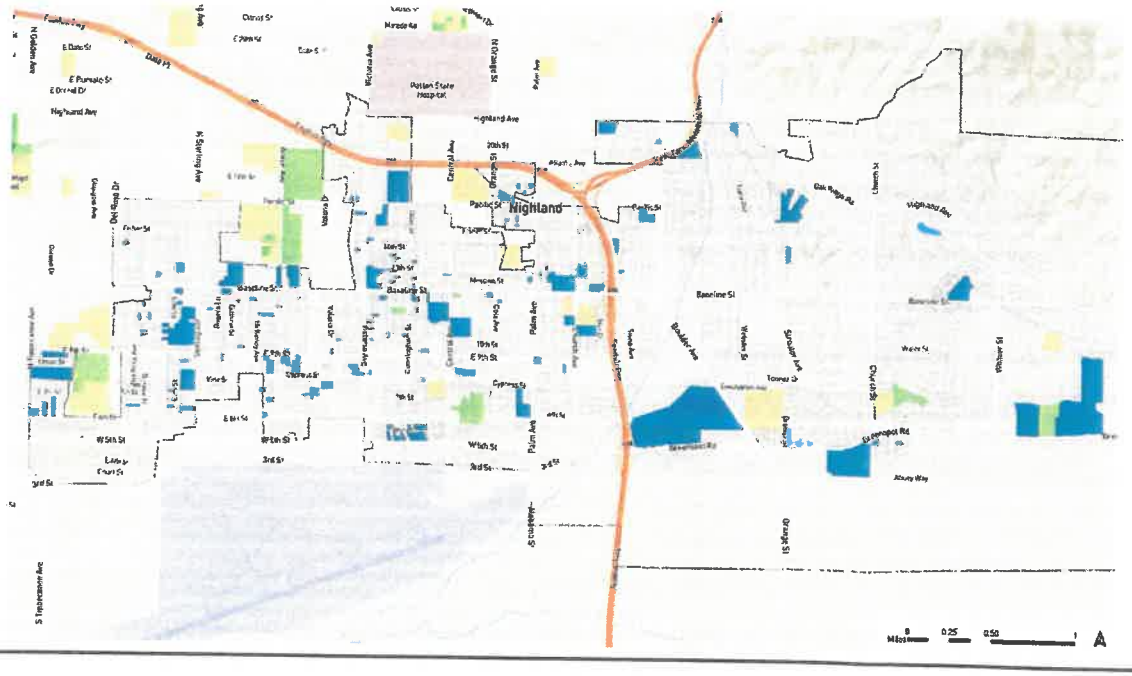
CalEnviroScreen Mapping Results



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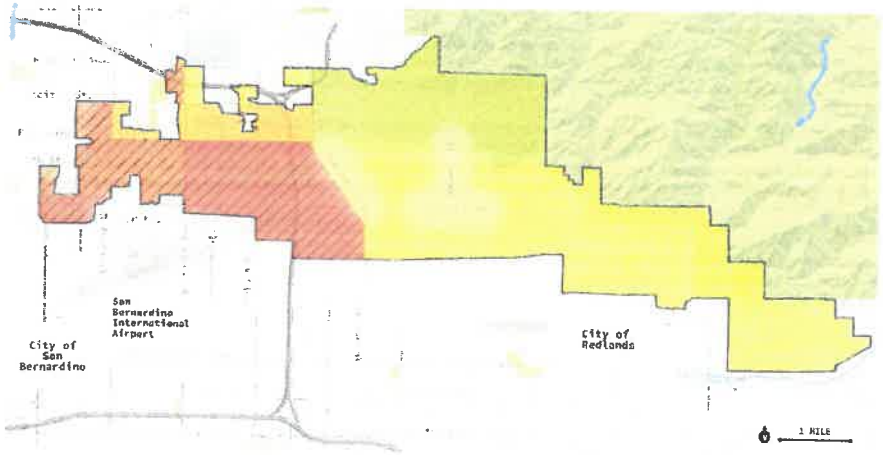
Sites Inventory Mapping



35

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CalEnviroScreen Mapping Results



CalEnviroScreen 3.0 Results (June 2018 Update)

- 91 - 100% (Highest Scores)
- 81 - 90%
- 71 - 80%
- 61 - 70%
- 51 - 60%
- 41 - 50%
- 31 - 40%
- 21 - 30%
- 11 - 20%
- 1 - 10% (Lowest Scores)

High Pollution, Low Population

Disadvantaged Communities (CalEnviroScreen Score above 75)

Least Disadvantaged — Most Disadvantaged

Source: OEHHA (California Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Accessed January 2021. https://oehha.ca.gov/calenviro-screen/report/calenviroscreen-30

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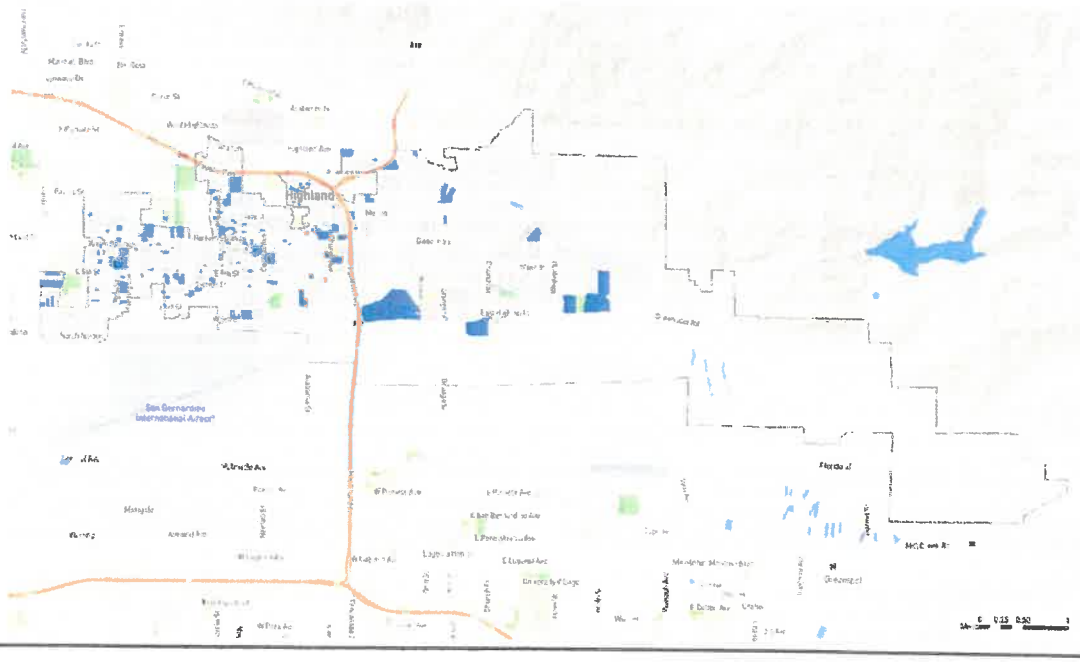
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Sites Inventory Mapping



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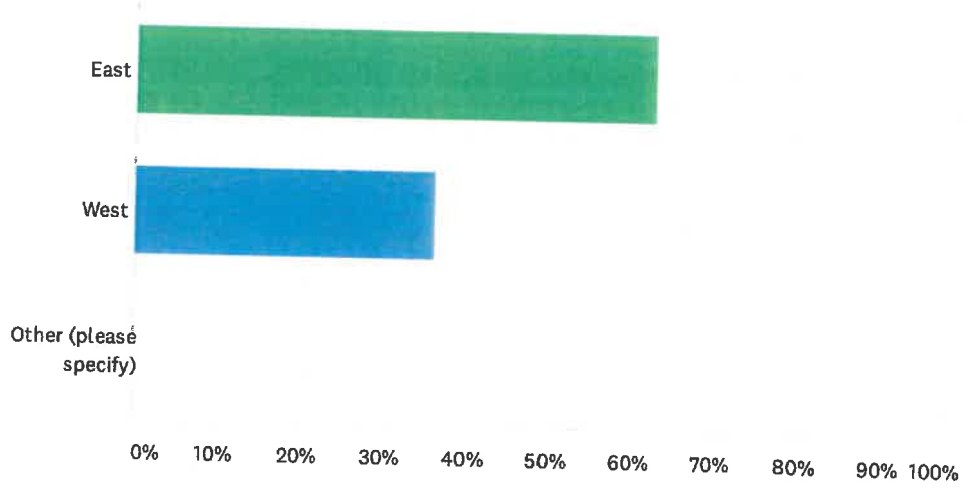
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Exhibit A

City of Highland Housing, Safety and Environmental Justice Survey

Q1 Do you live east or west of Interstate 210?

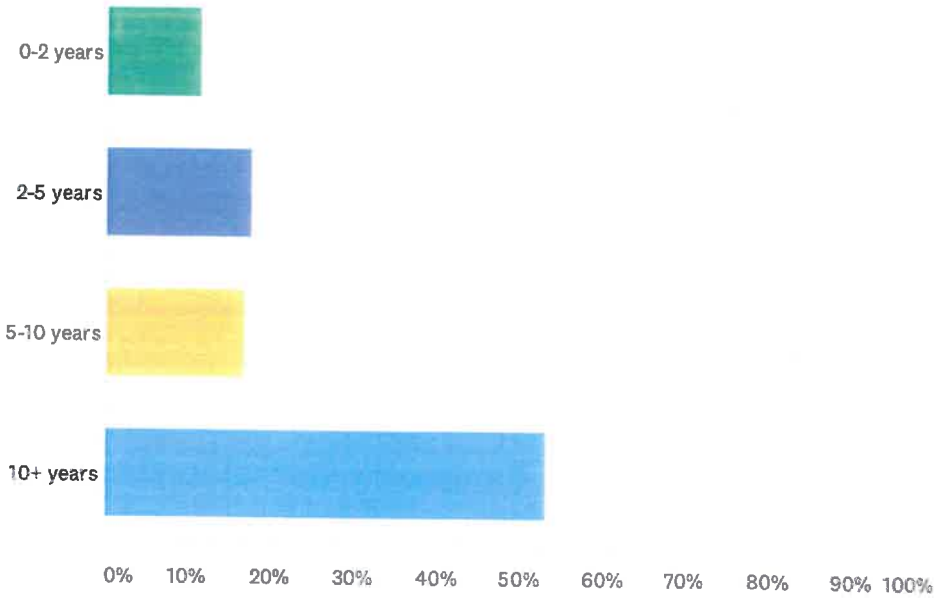
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
East	63.39%	71
West	36.61%	41
Other (please specify)	0.00%	0
TOTAL		112

Q2 How long have you lived in Highland?

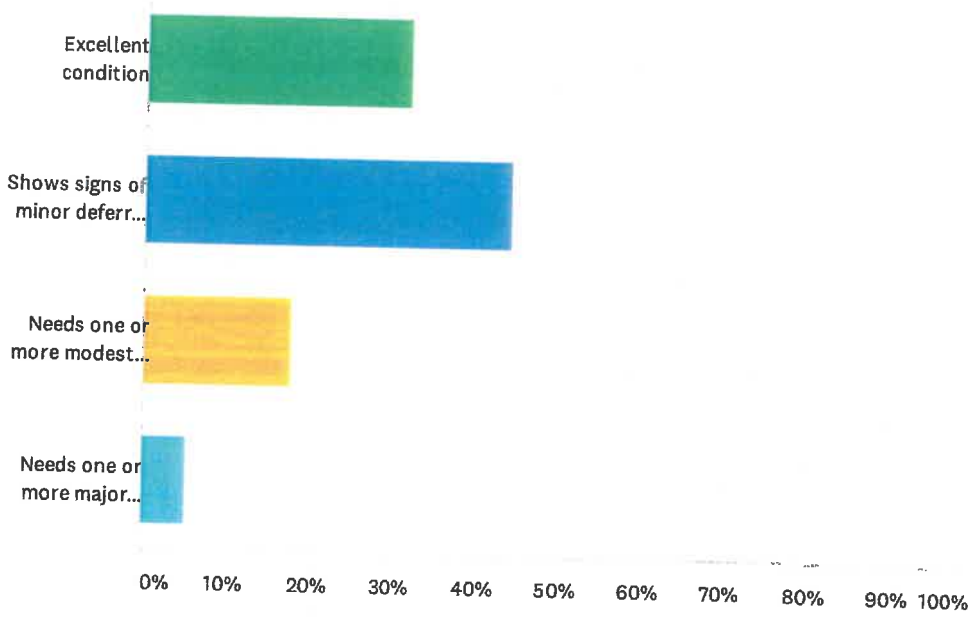
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
0-2 years	11.61%	13
2-5 years	17.86%	20
5-10 years	16.96%	19
10+ years	53.57%	60
TOTAL		112

Q3 How would you rate the physical condition of the residence you live in?

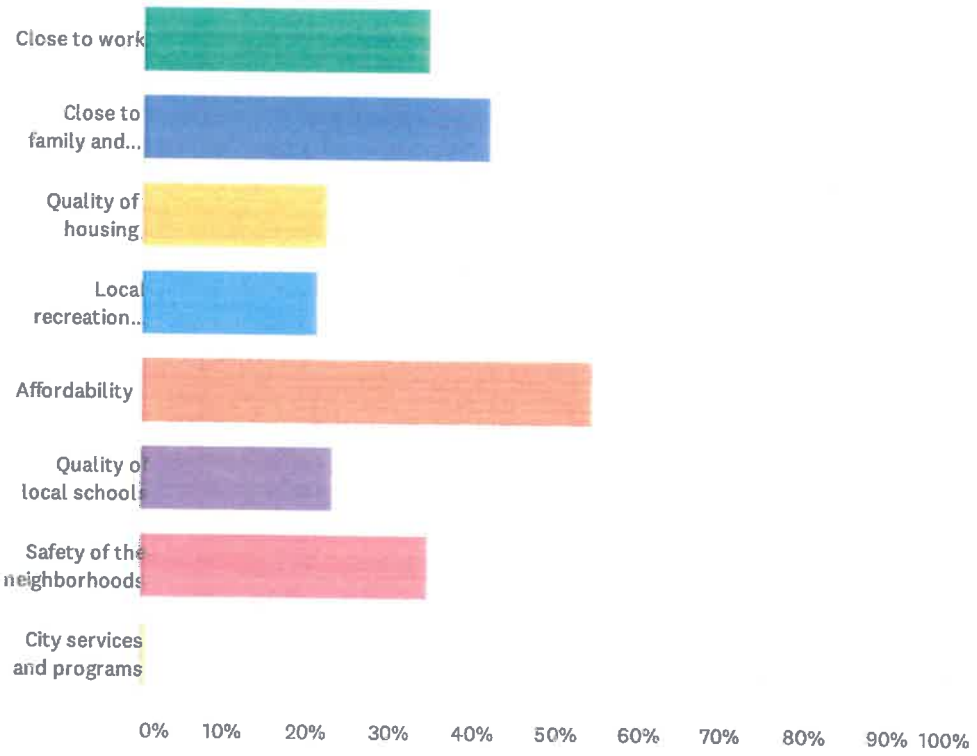
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Excellent condition	32.14%	36
Shows signs of minor deferred maintenance (i.e. peeling paint, chipped stucco, etc.)	44.64%	50
Needs one or more modest rehabilitation improvements (i.e. new roof, new siding, etc.)	17.86%	20
Needs one or more major upgrade (i.e. new foundation, new plumbing, new electrical, etc.)	5.36%	6
TOTAL		112

Q4 Why have you chosen to live in Highland? Select all that apply.

Answered: 112 Skipped: 0

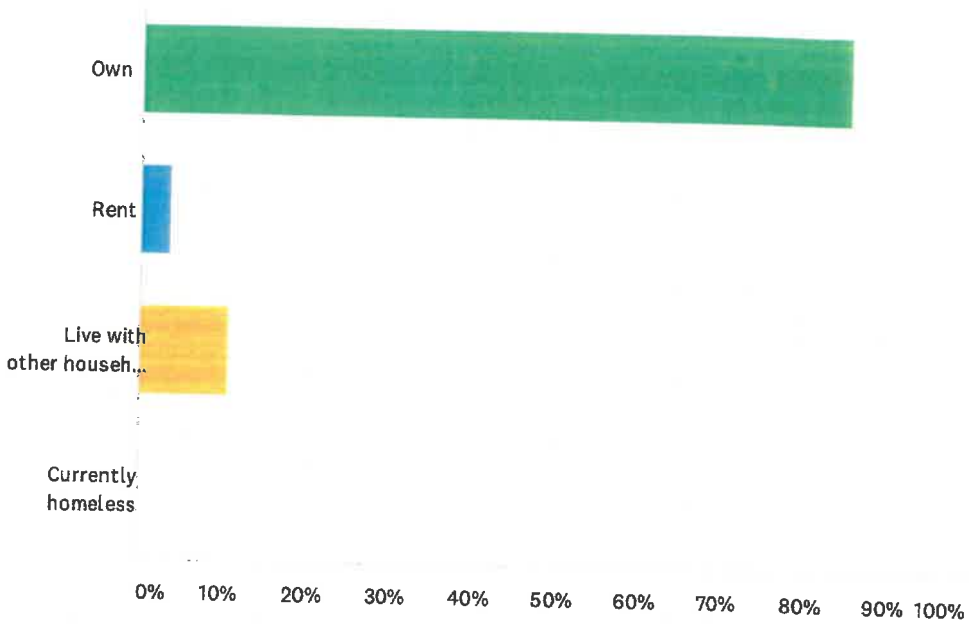


ANSWER CHOICES	RESPONSES	
Close to work	34.82%	39
Close to family and friends	41.96%	47
Quality of housing	22.32%	25
Local recreation amenities and scenery	21.43%	24
Affordability	54.46%	61
Quality of local schools	23.21%	26
Safety of the neighborhoods	34.82%	39
City services and programs	0.89%	1

Total Respondents: 112

Q5 Do you own or rent your home?

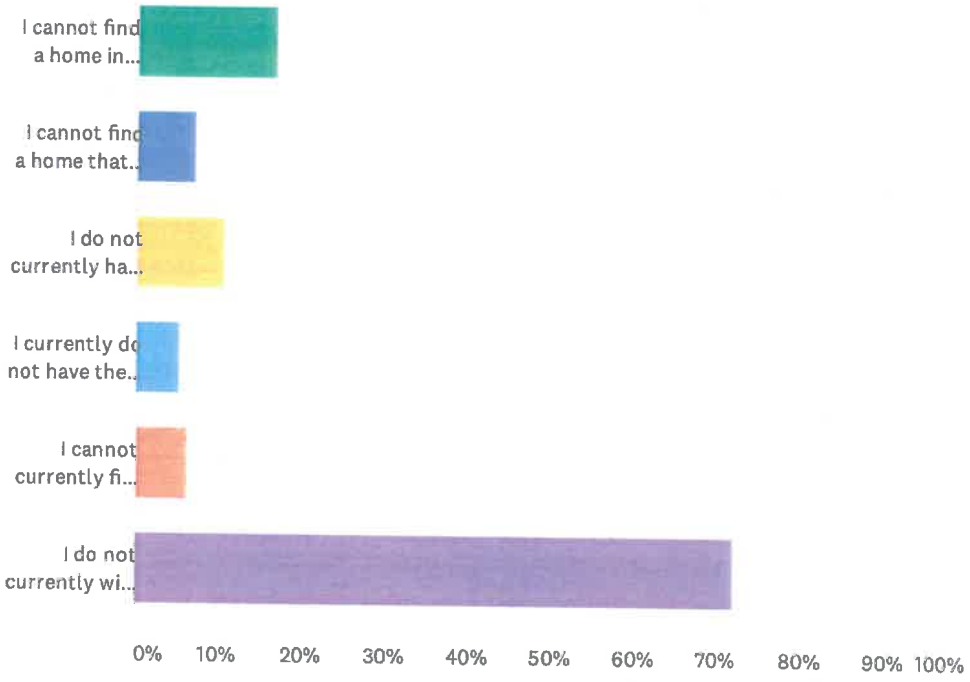
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Own	85.71%	96
Rent	3.57%	4
Live with other household (neither own or rent)	10.71%	12
Currently homeless	0.00%	0
TOTAL		112

Q6 If you wish to own a home in Highland, but do not, what issues are preventing you at this time? Mark all that apply.

Answered: 112 Skipped: 0

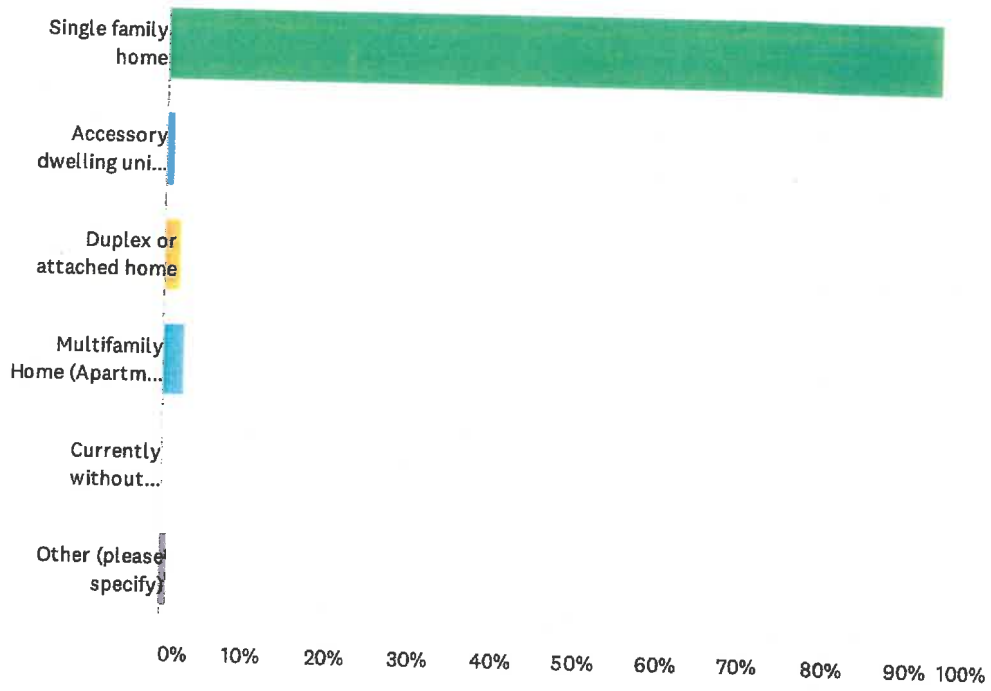


ANSWER CHOICES	RESPONSES	
I cannot find a home in Highland within my target price range	16.96%	19
I cannot find a home that suits my needs (i.e. size, disability accommodations, etc.)	7.14%	8
I do not currently have the financial resources for an appropriate down payment	10.71%	12
I currently do not have the financial resources for an adequate monthly mortgage payment	5.36%	6
I cannot currently find a home that suits my quality standards in Highland	6.25%	7
I do not currently wish to own a home in Highland, or already own my home.	72.32%	81

Total Respondents: 112

Q7 Select the type of housing that best describes your current home

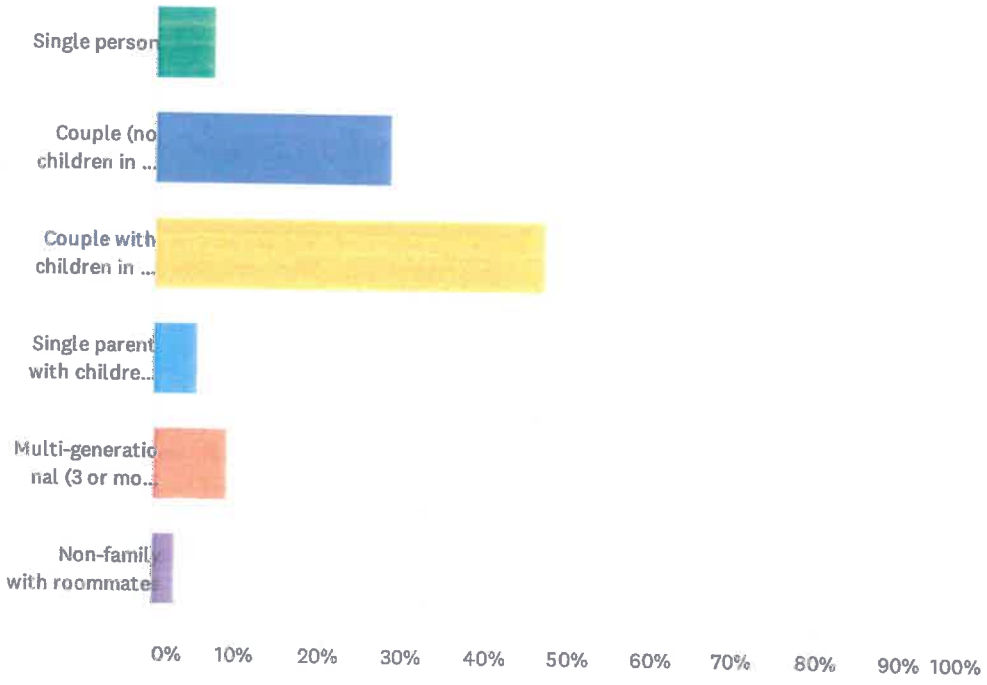
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single family home	93.75%	105
Accessory dwelling unit (granny flat or guest house)	0.89%	1
Duplex or attached home	1.79%	2
Multifamily Home (Apartment or Condo)	2.68%	3
Currently without permanent shelter	0.00%	0
Other (please specify)	0.89%	1
TOTAL		112

Q8 Which best describes your household type?

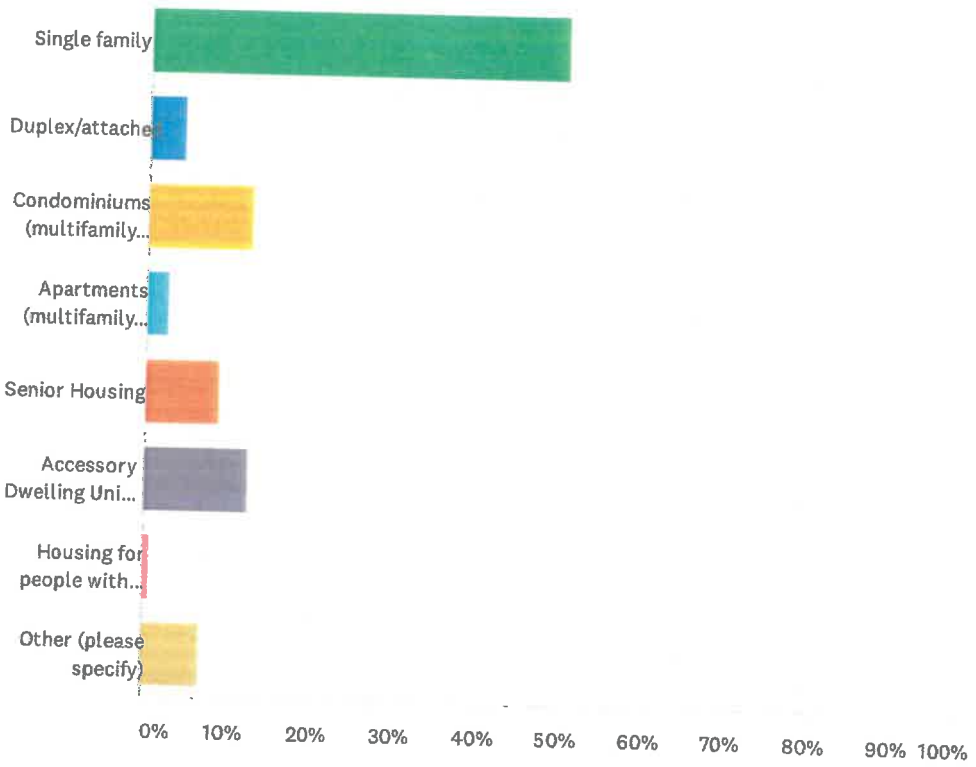
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single person	7.14%	8
Couple (no children in the home)	28.57%	32
Couple with children in the home	47.32%	53
Single parent with children in home	5.36%	6
Multi-generational (3 or more generations in the same home)	8.93%	10
Non-family with roommates	2.68%	3
TOTAL		112

Q9 What type of housing is most needed in Highland?

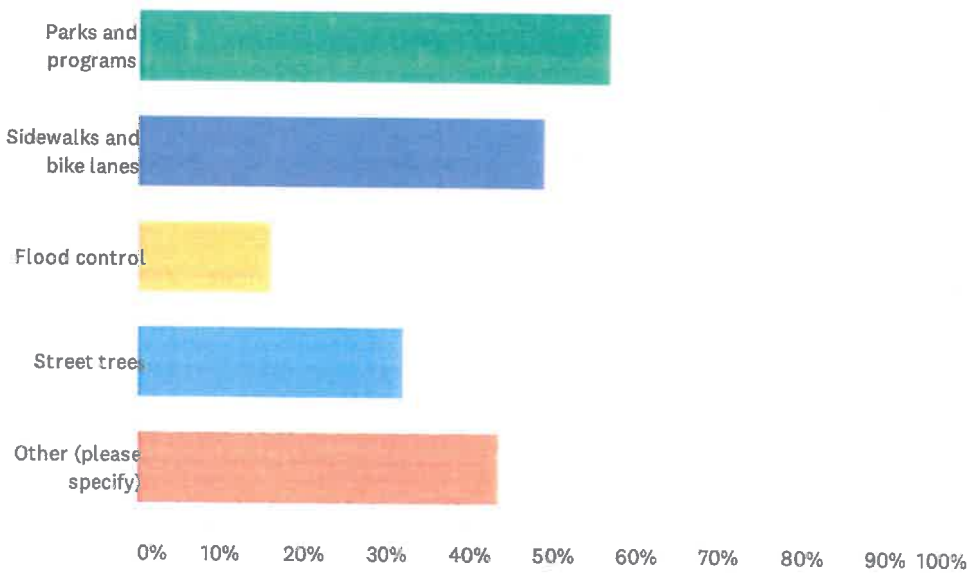
Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single family	50.89%	57
Duplex/attached	4.46%	5
Condominiums (multifamily ownership)	12.50%	14
Apartments (multifamily rentals)	2.68%	3
Senior Housing	8.93%	10
Accessory Dwelling Units (granny flat or guest house)	12.50%	14
Housing for people with disabilities	0.89%	1
Other (please specify)	7.14%	8
TOTAL		112

Q10 What public facilities, improvements or programs are needed in your neighborhood? (Select all that apply).

Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Parks and programs	57.14%	64
Sidewalks and bike lanes	49.11%	55
Flood control	16.07%	18
Street trees	32.14%	36
Other (please specify)	43.75%	49

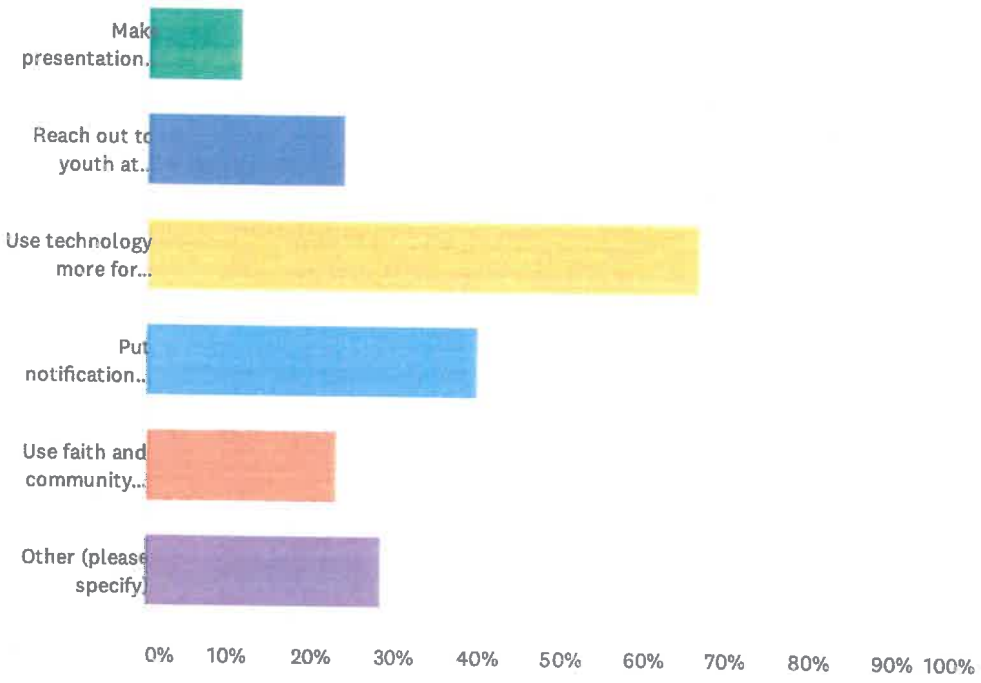
Total Respondents: 112

Q11 What areas of the City have pollution, such as air pollution, and how could this be improved?

Answered: 87 Skipped: 25

Q12 What would help you get involved in Highland get engaged in the public decision making process? (Select all that apply).

Answered: 112 Skipped: 0

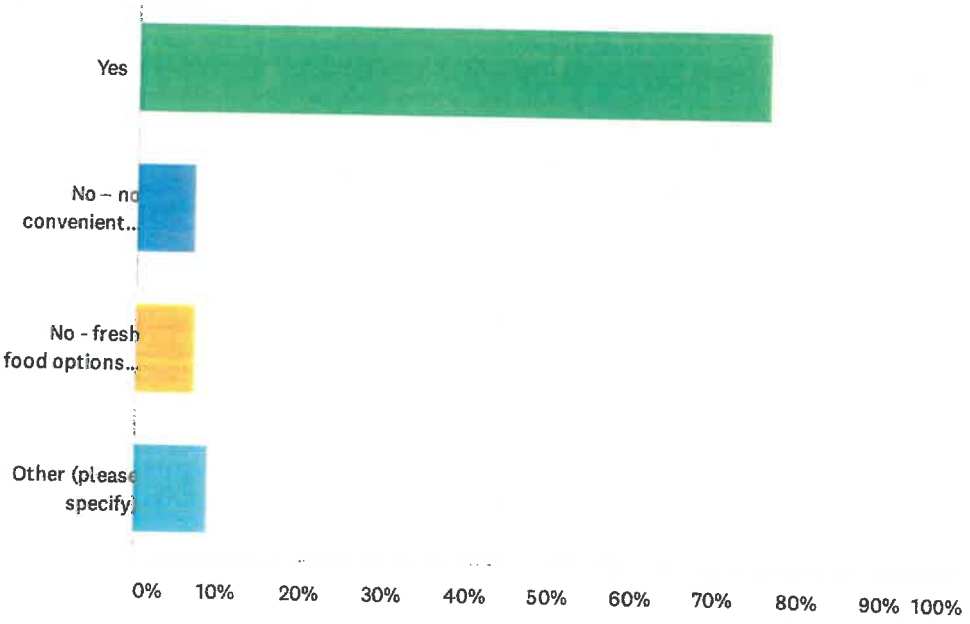


ANSWER CHOICES	RESPONSES	
Make presentations at Senior Centers.	11.61%	13
Reach out to youth at schools and libraries.	24.11%	27
Use technology more for communications (i.e. Facebook live or virtual town halls)	66.96%	75
Put notifications in grocery stores, schools, and other public places.	40.18%	45
Use faith and community leaders	23.21%	26
Other (please specify)	28.57%	32

Total Respondents: 112

Q13 Is it easy for you to access affordable healthy food? If not, why not?

Answered: 112 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	76.79%	86
No – no convenient shops near my house.	7.14%	8
No - fresh food options are not affordable.	7.14%	8
Other (please specify)	8.93%	10
TOTAL		112

Q14 Is there anything else you would like to share about the future of Highland?Questions to consider: - Are you satisfied with your current housing situation? Why or Why Not. - Do you feel prepared for a natural disaster (examples: heat waves, earthquakes, wildfires, etc.)? Why or Why not?

Answered: 91 Skipped: 21

	COMMENTS	LOCATION	Relevant Subsection	RESPONSE/CHANGES MADE	STATUS
	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).)			Added new Section - Section 2, Review of Programs Addressing the Housing Needs for the Population with Special Needs, in Appendix A.	
1	Special Needs Populations: As part of the review of programs in the past cycle, the element must provide cumulative 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). *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).)*	A: 5th Cycle Review	Appendix A, Section 2	Added a description of resources available to City residents, developed the analysis of fair housing enforcement in the City through the Inland Fair Housing Mediation Board. As well as a description of programs in the Housing Element related to fair housing enforcement and outreach. (Appendix D, Section 4.1)	Completed
2	Outreach: While the element briefly discusses coordination with the Inland Fair Housing and Mediation Board, it, largely, does not address this requirement. The element must include a description of fair housing enforcement and outreach capacity as it relates to the ability of the City and fair housing entities to disseminate information related to fair housing and provide outreach and education to assure community members are aware of fair housing laws and rights.	D: Affirmatively Furthering Fair Housing Analysis			Completed
3	Regional Patterns and Trends: The element generally describes local patterns and trends but must also analyze Highland relative to the rest of the region regarding integration and segregation, racially and ethnically concentrated areas of poverty, disparities in access to opportunity and disproportionate housing needs, including displacement risks.	D: Affirmatively Furthering Fair Housing Analysis		Added text and maps describing the regional trends in relation to Highland in each section of Appendix D.	Completed
4	Other Relevant Factors: While the element includes local data and knowledge, it must also include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element must analyze the impact of the "Crime Free" ordinance mentioned in Program 2 on affirmatively furthering fair housing (AFFH) throughout the City.	D: Affirmatively Furthering Fair Housing Analysis		Changes made to Appendix D, Section 7 to explain why changes to Program 2 will advance fair housing. Added language to Appendix A to explain how we are enhancing this program.	Completed
5	Sites Inventory: The element discusses the proposed number of sites and units relative to income, but it must also address other components of the assessment of fair housing (e.g., R/ECAP, Access to Opportunity, Disproportionate Housing Need, including Displacement). The accompanying analysis shall also be reflective of housing development at all income-levels address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group.	D: Affirmatively Furthering Fair Housing Analysis		Changes made to Appendix D to include a thorough analysis of fair housing as it relates to improved or exacerbated conditions of segregation, disproportionate housing needs, and for persons with disabilities.	Completed
	Goals, Priorities, Metrics, and Milestones: Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. Currently, programs are not sufficient to facilitate meaningful change and address AFFH requirements. Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.			Program 26 revised to include evaluation of the need to establish an Ad Hoc Fair Housing committee to provide policy recommendations to policies and programs in a manner that furthers fair housing.	
6	*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).)*	Goals Policies Programs		See text added to Section 3.7.7 including the projected housing needs.	Completed
7	Extremely Low Income (ELI Households: The element includes analysis regarding ELI households, but it must also identify projected housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the regional housing need allocation (RHNA) for very low-income households qualify as ELI households. *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).)*	B: Community Profile	Appendix B, Section 3.7.7, Extremely Low-Income Households	Added text and updated tables to reflect level of payment in Highland. Appendix B, Section 3.7.	Completed
8	Overpayment: While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner).	B: Community Profile			Completed
	Overpayment: Add or modify policies and programs as appropriate based on the analysis above.			Programs of the housing element to address the needs of lower-income households include: The City's inclusionary housing ordinance (Program 4) will be used for the allocation of funding to support affordable housing for lower-income households. Program 5 calls for an evaluation of existing development impact fees to identify opportunities for reduced fees in exchange for affordable housing development. Program 5 continues to refer residents to the Housing Authority's Housing Choice Voucher Program. Program 8 incentivizes the production of affordable housing by-right. Other programs of the Housing Element increase coordination and collaboration with City partners to advocate for increased support in meeting the needs of lower-income households.	
9	Housing Conditions: The element identifies the age of the housing stock. However, the element must also estimate the number of units in need of rehabilitation and replacement. The analysis could supplement this information with estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations. For additional information, see the Building Blocks at http://www.hcd.ca.gov/communitydevelopment/building-blocks/housing-needs/housing-stock-characteristics.shtml.	Goals Policies Programs		Added section, Substandard Housing with table and paragraphs explaining housing conditions and rehabilitation of units. Included applicable programs. Appendix B, Section 3.3.	Completed
10	*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).)*	B: Community Profile		The large majority of parcels identified in the land inventory to accomodate the RHNA at all income levels are identified on vacant sites. Of the 240 total parcels identified with exisiting capacity across all income levels, only 20 parcels are nonvacant. Additionally, the element relies on less than 30 percent of the housing needs for lower-income households on nonvacant sites. A site by site overview has been added to provide an in-depth description of the methodology used to determine that the existing uses are not considered an impediment to the additional development potential identified within the planning period on the nonvacant sites identified to accomodate lower-income households.	Completed
11	Nonvacant Sites: The element identifies a large portion of its RHNA at all income levels on nonvacant sites. The element must describe the methodology used to determine the additional development potential within the planning period. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Please be aware that relying on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.	E: Sites Analysis and Inventory	Appendix E, Section 4.2.1, Nonvacant Sites	There are a total of 2 parcels identified to accomodate housing for lower-income households that are less than 0.5 acres. However, each of those parcels are included as part of a consolidate site (Sites 9A and 18B) that are each reasonably expected to be consolidated into a single site. A full discussion has been added to Section 4.2, Lower-Income Sites, in Appendix E, to explain that due to their common ownership, adjacent location as shown in the images added to Section 4.2, and because both of the parcels are vacant, it is reasonable to assume that they would be consolidated into one site to maximize the lot size and development opportunity. Please note that both of the other parcels in Sites 9A and 18B are individually larger than the minimum 0.5-acre requirement, and as such, those parcels would still be appropriate to accommodate the lower-income RHNA without assuming they will be consolidated. Nonetheless, the City will facilitate the opportunities for lot consolidation through Program 23, Lot Consolidation Incentive, of the Housing Element by amending the Highland Municipal Code to incentivize lot consolidation through an expedited development permit review process on sites identified in the Sites Inventory as having the potential to accommodate lower- or moderate-income units.	Completed
12	Small Sites: Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element identifies small sites and as a result should include appropriate analysis and programs or remove the sites. For example, an analysis could provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation. In this case, the element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City's housing need for lower-income households. Based on a complete analysis, the City should consider adding or revising programs to include incentives for facilitating development on small sites.	E: Sites Analysis and Inventory		As the comment directed, the projects that have yet to be proposed in the areas, have been moved to be included in the sites inventory rather than credited toward the RHNA. Projects A through I in Table 4 of Appendix E are all expected to be built in the planning period. The text has been updated to ensure that this is stated for each project. The 200 hundred units that were previously credited toward the lower-income RHNA category as part of the pipeline residential development credit for the Greenspot Village Area specific plans in the previous draft submitted to HCD for your initial review, are no longer credited units toward the lower-income RHNA category. The corresponding text under Section 4.1.1, Greenspot Village & Marketplace, has been revised. Instead, Sections 4.2, Lower-Income Sites, has been updated to reflect that the units are an available site and have been included under existing capacity identified in the Sites Inventory.	Completed
13	"Pipeline" Projects: The element identifies a number of units "in the pipeline" per planned development and specific plan communities. However, it is unclear if actual projects have been proposed for these areas, or if the capacity credited is based on the anticipated build out of these areas. If projects have yet to be proposed in these areas, the element should include them in the sites inventory rather than credit them toward the RHNA, and include information related to any phasing or other development requirements that could impact buildout in the planning period. If they are approved projects, the element should state whether the units are expected to be built in the planning period. Specifically, 200 hundred units have been credited toward the lower-income RHNA category as part of the pipeline residential development credit for the Greenspot Village Area specific plans. It is not clear if this is an actual project or an available site in the planning period. If it is an actual project, then the project must be credited per the actual or proposed sales or rents.	E: Sites Analysis and Inventory			Completed

	Develop a plan that incentivizes and promotes the creation of ADUs that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, "accessory dwelling units" has the same meaning as "accessory dwelling unit" as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).) Programs must be expanded to include incentives to promote the creation and affordability of accessory dwelling units (ADU). Examples include exploring and pursuing funding, modifying development standards and reducing fees beyond state law, increasing awareness, preapproved plans and homeowner/applicant assistance tools.	Goals Policies Programs	Program 12 is updated	
26				Completed
	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 the element includes a general summary of the public participation process, it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should be revised to discuss outreach to lower-income and special needs groups during the public participation efforts, solicitation efforts for survey responses, and participation in community workshops, and if translation services were provided. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the element. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/getting-started/publicparticipation.shtml.	F: Community Engagement Summary	Included description of bilingual outreach as well as strakeholder outreach which included non-profits providing resources to low-income families to clarify that all economic segments were included in the development of the housing element throughout the document. A section for the public comments and public review period was included in the appendix. (Appendix F, Section 1.6)	
27				Completed
	In addition, HCD understands the City made the element available to the public after submittal to HCD. By not providing an opportunity 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 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.		Included a public comment section with a summary of the general comments provided in the public comment letter and clarified that it was received outside of the public review period. A short response to the letter was also provided.	
28				Completed