PLAN TO HOUSE OUR RIALTO

6th Cycle Housing Element

2021-2029

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Section 1

INTRODUCTION

INTRODUCTION

A. Role of the Housing Element

The Housing Element is a state mandated chapter of the Rialto General Plan; it identifies and analyzes the City's housing needs and includes a detailed outline and work program of the City's goals, policies, and quantified objectives related to housing. The Housing Element also addresses the maintenance and expansion of the housing supply to accommodate households currently living and expected to live in Rialto in this housing cycle. Through research and analysis, the Housing Element identifies available candidate housing sites and establishes the City's official housing policies and programs to accommodate the Regional Housing Needs Assessment (RHNA) goals as determined by the Southern California Association of Governments (SCAG). The programs and policies established within the Housing Element guide future decision-making to achieve the City's housing goals for the 2021-2029 planning period.

B. State Policy and Requirements

1. Background

As a mandated chapter of the Rialto General Plan, the Housing Element must meet all applicable requirements of existing state law when updated. Goals, programs and policies, and quantified objectives within the Housing Element consistent with state law are implemented within the housing cycle timeline to ensure the City accomplishes the identified actions.

2. State Requirements

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for updating a Housing Element. State Law requires that local governments review and revise the Housing Element of their comprehensive General Plans once every eight years.

The California Legislature has adopted an overall housing goal for the State to ensure every resident has a decent home and suitable living environment. Section 65580 of the California Government Code states:

a) *The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.*
b) *The early attainment of this goal requires cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.*
c) *The provisions of housing affordable to low- and moderate-income households requires the cooperation of all levels of the government.*
d) *Local and State governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for housing needs of all economic segments of the community. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the State in addressing regional housing needs.*

Table 1-1 summarizes the State Housing Element requirements and identifies where these requirements are addressed in this document.

Table 1-1: Housing Element Requirements

Housing Element Requirement(s)	Gov. Code Section	Reference in Housing Element
Analysis of employment trends.	Section 65583.a(1)	Section 2.C.1
Projection and quantification of existing and projected housing needs for all income groups.	Section 65583.a(1)	Section 3.D
Analysis and documentation of the City's housing characteristics, including cost for housing compared to ability to pay, overcrowding, and housing condition.	Section 65583.a(2)	Section 2.D, E, G
An inventory of land suitable for residential development including vacant sites and sites having redevelopment potential.	Section 65583.a(3)	Section 3.D
Analysis of existing and potential governmental constraints upon the maintenance, improvement, or development of housing for all income levels.	Section 65583.a(5)	Section 3.B
Analysis of existing and potential nongovernmental (private sector) constraints upon maintenance, improvement, or development of housing for all income levels.	Section 65583.a(6)	Section 3.A
Analysis concerning the needs of the homeless.	Section 65583.a(7)	Section 2.F.7
Analysis of special housing needs: handicapped, elderly, large families, farm workers, and female-headed households.	Section 65583.a(7)	Section 2.F
Analysis of opportunities for energy conservation with respect to residential development.	Section 65583.a(8)	Section 3.E.2
Identification of Publicly Assisted Housing Developments.	Section 65583.a(9)	Section 3.D
Identification of Units at Risk of Conversion to Market Rate Housing.	Section 65583.a(9)	Section 3.D
Identification of the City's goal relative to the maintenance, improvement, and development of housing.	Section 65583.b	Section 4
Analysis of quantified objectives and policies relative to the maintenance, improvement, and development of housing.	Section 65583.b	Section 4
Identification of adequate sites that will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels.	Section 65583.c(1)	Appendix B
Identification of strategies to assist in the development of adequate housing to meet the needs of low and moderate-income households.	Section 65583.c(2)	Section 3.D
Description of the Public Participation Program in the formulation of Housing Element Goals, Policies, and Programs.	Section 65583.c(9)	Appendix C
Description of the Regional Housing Needs Assessment (RHNA) prepared by the Southern California Association of Governments.	Section 65583.e	Section 3.D.1
Analysis of Fair Housing, including Affirmatively Furthering Fair Housing.	Section 8899.50	Section 3.C
Review of the effectiveness of the past Element, including the City's accomplishments during the previous planning period.	Section 65588(a)	Appendix A

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

Rialto's Housing Element was last adopted in 2019 for the Mid-Cycle Update of the 5th Cycle – 2014-2021 Planning Period. This Housing Element, for the 2021-2029 planning period, is part of the 6th Cycle for jurisdictions within the SCAG region and allows for synchronization with the Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS). The Element sets forth an 8-year strategy to address the City's identified housing needs, including specific implementing programs and activities.

3. Regional Housing Needs Assessment (RHNA)

Section 65583 of the California Government Code sets forth the specific content requirements of a jurisdiction's housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their "fair share" of regional housing needs. Local governments and Councils of Governments (COGs) are required to determine existing and future housing need and the allocation of this need must be approved by the California Department of Housing and Community Development (HCD). Rialto is a member agency of SCAG, who is responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region and therefore acts as the COG for San Bernardino County in this case.

HCD established that the planning period for the current RHNA is to be from October 15, 2021 to October 15, 2029. For the 2021-2029 planning period the City is allocated a total of 8,272 housing units, including 2,218 units affordable to very low-income households, 1,206 units affordable to low-income, 1,371 units affordable to moderate-income, and 3,477 units affordable to above-moderate (market-rate) income households.

Table 1-2: City of Rialto Regional Housing Needs Assessment Allocation

Very Low-Income Range	Low-Income Range	Moderate-Income Range	Above-Moderate Range	Total
2,218 housing units	1,206 housing units	1,371 housing units	3,477 housing units	8,272 housing units

4. Relationship to Other Elements of the General Plan

The goals, policies, actions, and programs described in the Housing Element relate to, and are consistent with, the other Elements of the Rialto General Plan, which was last updated in 2019. The Housing Element supports and reinforces residential development policies contained in the Land Use Element. The Land Use Element establishes the location, type, intensity, and distribution of land uses throughout the City, and defines build-out potential of these land uses. By designating residential development, the Land Use Element establishes limits for densities and types of housing units constructed in the City. It also identifies lands designated for a range of other land uses, including employment-generating uses, open space, and public uses. The presence and potential for jobs can affect the current and future local demand for housing at the various income levels in the City.

The Circulation Element of the General Plan also relates to the Housing Element. The Circulation Element establishes a transportation plan to accommodate the movement of people and goods within and through the City. Consequently, the Housing Element must include policies and incentives that consider the types of infrastructure essential for residential housing units in addition to mitigating the effects of growth in the City.

The Housing Element has been reviewed for consistency with the City's other General Plan Elements, and the Housing Element's policies and programs are consistent with the other Elements. As portions of the General Plan may be amended in the future, the Housing Element will be reviewed to ensure internal consistency is maintained.

5. Public Participation

Section 65583 of the Government Code states that, "The local government shall make 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." Meaningful community participation is also required in connection with the City's Assessment of Fair Housing (AFH). A discussion of citizen participation is provided below.

As part of the 6th Cycle Housing Element Update process, the City of Rialto has conducted extensive public outreach activities beginning in Spring 2021. These outreach efforts included community workshops, online and in-person surveys, City Council meetings, a Planning Commission Study Session, digital media, and noticed Public Hearings. Project materials, including summaries from community workshops and public meetings, notices, and draft public review documents are available on the City's website: https://www.rialtoca.gov/633/Plan-to-House-Our-Rialto-Housing-Element.

Outreach for the 6th Cycle Housing Element to the community, includes the following actions:

- Housing Element Update webpage with the Public Review Draft and all housing materials available in English and Spanish, located at https://www.rialtoca.gov/633/Plan-to-House-Our-Rialto-Housing-Element,
- Two Community Workshops and the recorded presentations posted to the City's website,
- A Spanish-speaking only workshop,
- Self-guided workshops with surveys available online and in-person,
- An online interactive feedback map,
- Stakeholder meeting,
- City Council meetings, and
- Planning Commission Study Sessions

As required by Government Code Section 65585(b)(2), all written comments regarding the Housing Element made by the public have previously been provided to each member of the City Council.

Appendix C contains a summary of all public comments regarding the Housing Element received by the City during the update process.

6. Data Sources

The data used for the completion of this Housing Element comes from a variety of sources. These include, but are not limited to:

- United States Census, 2010
- American Community Survey (U.S. Census Bureau Survey Program)
- Regional Analysis of Impediments to Fair Housing (AI)
- Point-in-Time Homeless Census by the Regional Task Force on the Homeless, 2020
- Home Mortgage Disclosure Act (HMDA) lending data

- California Department of Economic Development
- California Employment Development Division Occupational Wage data, 2020
- Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS), 2013-2017
- SCAG Regional Growth Forecast, RTP/SCS

The data sources represent the best data available at the time this Housing Element Update was prepared. The original source documents contain the assumptions and methods used to compile the data.

7. Housing Element Organization

This Housing Element represents the City of Rialto's policy program for the 2021-2029, 6th Housing Cycle Planning Period. The Housing Element is comprised of the following Chapters:

Section 1: Introduction contains as summary of the content, organization and statutory considerations of the Housing Element;

Section 2: Community Profile contains an analysis of the City's population, household and employment base, and the characteristics of the housing stock;

Section 3: Housing Constraints, Resources, and Affirmatively Furthering Fair Housing examining governmental and non-governmental constraints on production, maintenance, and affordability of housing and provides a summary of housing resources, including sites identification and funding and financial considerations;

Section 4: Policy Plan addresses the City's identified housing needs, including housing goals, policies and programs.

Appendices provide supplementary background resources including:

Appendix A – Review of Past Performance of 5th Cycle Housing Element Programs

Appendix B – Adequate Sites Analysis

Appendix C – Community Engagement Summary

Appendix D – Glossary of Housing Terms

Section 2

CITY OF RIALTO COMMUNITY PROFILE

CITY OF RIALTO COMMUNITY PROFILE

The Community Profile provides an overview of the City's housing and population conditions which are the foundation for policies and programs within with the Housing Element. To understand the City's housing needs, the nature of the existing housing stock and the housing market are comprehensively evaluated. This section of the Housing Element discusses the major components of housing needs in Rialto, including population, household, economic and housing stock characteristics. These components are presented in a regional context with nearby communities when relevant. This assessment serves as the basis for identifying the appropriate goals, policies, and programs for the City to implement during the 2021-2029 Housing Element cycle.

A. Key Community Demographic Findings

Population

- The Rialto population is projected to grow by about 7,900 new residents by 2040.
- Rialto has been experiencing a growth in the number of residents aged 20 to 34 years and those over 50 years. Children and young adults under the age of 19 have been decreasing.
- About 74 percent of the Rialto population identify as Hispanic or Latino. The two largest groups who do not identify as Hispanic or Latino, are Black or African American at 12 percent and white at 10 percent.

Employment

- Job growth in Rialto is projected to increase by 45 percent or 9,400 new job opportunities.
- The three largest employment sectors are education services, health care, and social assistance industry at 17 percent, transportation and warehousing, and utilities at nearly 15%, and retail trade at nearly 14%. The transportation and warehousing, and utilities industry has experienced the greatest growth since 2010.
- At 10.6%, Rialto's unemployment rate is the highest in the area and higher than the San Bernardino County average.

Households

- Rialto has the highest average household size compared to neighboring cities and San Bernardino County. Over half of the City's households are made up of at least 4 persons.
- Female headed households without a spouse present make up 19.3 percent of total households and have increased by 12 percent since 2010.

Special Needs

- Seniors over 65 years of age represent 9.3 percent and a growing portion of Rialto's population.
- Just under 10 percent of Rialto residents have at least one disability. Ambulatory difficulties are the most common at 5.5 percent of the total Rialto population.
- About 16 percent of Rialto households are single-parent households living below the poverty line.

Housing Stock

- While Rialto's population has increased by about 4 percent between 2019 and 2010, the City's housing stock has only grown by about 2 percent in that same time period.
- Single-unit detached dwellings make up the most of Rialto's housing stock at about 71 percent. Mobile homes represent another 6 percent.
- About 22 percent of the City's housing stock was built within the last 30 years.

B. Population Characteristics

Population characteristics such as growth, race and ethnicity, age, and employment influence housing need including the type, amount, and affordability levels. The following section analyzes each of these population characteristics and identifies trends that indicate changing housing needs.

1. Population Growth

According to the SCAG 2016-2040 Regional Growth Forecast, Rialto's population has grown and is projected to continue increasing through 2040. **Table 2-1** shows an estimated population growth of 5 percent between 2010 and 2020 and an anticipated increase of 7.6 percent between 2020 and 2040. In contrast, population growth forecasts for nearby cities and San Bernardino County are higher. For example, the City of Fontana is projected to grow 37.1 percent between 2020 and 2040 and San Bernardino County is projected to grow 24.3 percent during the same time period.

Table 2-1: Population Growth (2010-2040)

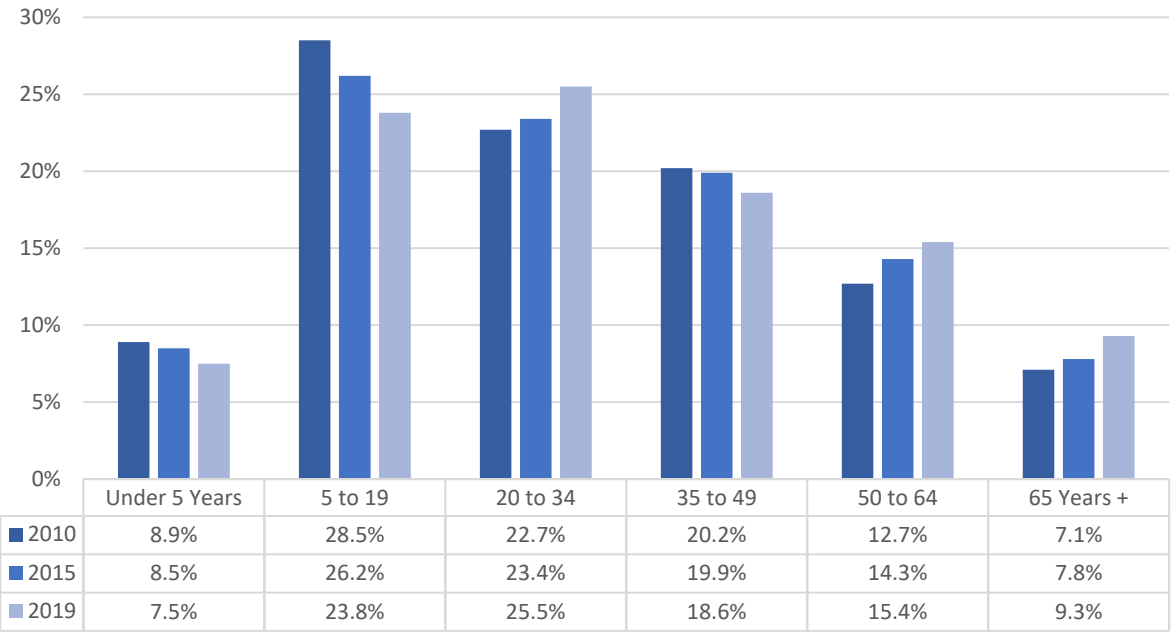
Jurisdiction	Population				Percent Change	
	2010 Actual	2020 Projected	2035 Projected	2040 Projected	2010-2020	2020-2040
Fontana	196,069	204,900	266,300	280,900	4.5%	37.1%
Rialto	**99,171**	**104,100**	**111,400**	**112,000**	**5.0%**	**7.6%**
San Bernardino	209,924	229,700	256,400	257,400	9.4%	12.1%
Colton	52,154	57,600	67,800	69,100	10.4%	20.0%
San Bernardino County	2,035,210	2,197,000	2,638,000	2,731,000	7.9%	24.3%

Sources: Bureau of the Census (2010) and SCAG 2016-2040 Regional Growth Forecast by Jurisdiction Report.

2. Age Characteristics

Rialto is experiencing an aging population trend as reflected by a growing percentage of persons between the ages of 20-34 years and 50 years and older. **Figure 2-1** shows that in 2010 persons between 5 and 19 years of age represented the largest percentage of Rialto's population. As the cohort aged, population totals by age shifted. In 2019, adults between 20 and 34 years of age made up the largest percentage of the population. Persons over the age of 50 have also increased as a percent of the total. They made up 19.8 percent of the population in 2010. In 2019 those over 50 made up 24.7 percent of the population.

Figure 2-1: Age Characteristics (2010-2019)



Source: American Community Survey, 5-Year Estimates, 2010, 2015, 2019.

Table 2-2 shows that Rialto's population is similar to nearby cities and San Bernardino County. The median age in Rialto is 30.5 years and the second lowest after San Bernardino (29.9 years). The City of Rialto has the largest percentage of population age 50 to 64 compared to neighboring cities.

Table 2-2: Comparative Age Characteristics (2019)

Jurisdiction	Under 5 Years	5 to 19	20 to 34	35 to 49	50 to 64	65 Years +	Median Age
Fontana	6.8%	25.4%	23.3%	21.8%	14.9%	7.8%	31
Rialto	**7.5%**	**23.8%**	**25.5%**	**18.6%**	**15.4%**	**9.3%**	**30.5**
San Bernardino	8.1%	24.7%	24.4%	18.6%	15.2%	9.0%	29.9
Colton	7.7%	22.4%	25.9%	18.6%	15.0%	10.4%	31.4
San Bernardino County	7.2%	22.3%	22.8%	19.0%	17.4%	11.3%	33.3

Source: American Community Survey, 5-Year Estimates, 2019.

3. Race and Ethnicity Characteristics

Equal opportunity for housing is an important component in the provision of housing units within jurisdictions. Racial and ethnic characteristics assists the city in identifying potential housing needs across all racial and ethnic groups within Rialto. Racial and ethnic characteristics may affect housing needs, choices, and desire as housing needs vary between ethnic or racial groups due to different cultural norms or preferences. For example, a particular culture may choose to live in a household with multiple generations (grandchildren, parents, grandparents), requiring larger housing units.

The Housing Element contains a further discussion of race and ethnicity in the Fair Housing analysis within **Section 3**.

Table 2-3 illustrates racial and ethnic composition of the City of Rialto compared to San Bernardino County. Rialto is made up of a diverse population with a greater variety of racial and ethnic populations than San Bernardino County as a whole. Rialto's population is mostly made up of persons identifying as Hispanic or Latino (74.3 percent). This is a larger population percentage than San Bernardino County where only 34.1 percent identify as Hispanic or Latino. Of those who do not identify as Hispanic or Latino, Black or African American Alone persons make up the largest percentage at 12.4 percent of the total Rialto population. This is a much greater percentage than San Bernardino where only 1.6 percent of the population identify as Black or African American Alone (not Hispanic or Latino).

Table 2-3: Racial and Ethnic Composition

Race and Ethnicity	Rialto	San Bernardino County
Hispanic or Latino	**74.3%**	**34.1%**
White Alone	53.3%	20.4%
Black or African American Alone	0.6%	0.1%
American Indian and Alaska Native Alone	0.4%	0.3%
Asian Alone	0.2%	0.2%
Native Hawaiian and Other Pacific Islander Alone	0.0%	0.0%
Some Other Race	17.2%	11.7%
Two or More Races	2.6%	1.3%
Not Hispanic or Latino	**25.7%**	**65.9%**
White Alone	9.6%	40.6%
Black or African American Alone	12.4%	1.6%
American Indian and Alaska Native Alone	0.2%	0.2%
Asian Alone	2.4%	20.3%
Native Hawaiian and Other Pacific Islander Alone	0.0%	0.3%
Some Other Race	0.1%	0.2%
Two or More Races	1.1%	2.8%

Source: American Community Survey, 5-Year Estimates, 2019.

An important component of analyzing race and ethnicity is identifying how demographics within the City have changed over time. **Table 2-4** illustrates changes between 2010 and 2019. The Rialto population who do not identify as Hispanic or Latino has decreased by 21.1 percent since 2010. The only racial group, who does not identify as Hispanic or Latino, to increase in population are those who identify as Asian Alone. In contrast, of those who do identify as Hispanic or Latino, those who identify as White Alone increased by 26.3 percent and those who identify as Black or African Alone increased by 5.6 percent. These trends show an increasingly diversifying population.

Table 2-4: Racial and Ethnic Composition				
Race and Ethnicity	2010	2015	2019	Percent Change 2010-2019
Hispanic or Latino	66.2%	72.4%	74.3%	16.5%
White Alone	43.8%	51.3%	53.3%	26.3%
Black or African Alone	0.6%	1.0%	0.6%	5.6%
American Indian and Alaska Native Alone	0.9%	0.4%	0.4%	-52.8%
Asian Alone	0.2%	0.1%	0.2%	-29.2%
Native Hawaiian and Other Pacific Islander Alone	0.0%	0.0%	0.0%	0.0%
Some Other Race	17.9%	17.3%	17.2%	-0.2%
Two or More Races	2.7%	2.3%	2.6%	-1.2%
Not Hispanic or Latino	33.8%	27.6%	25.7%	-21.1%
White Alone	14.4%	10.3%	9.6%	-30.7%
Black or African Alone	15.3%	12.0%	12.4%	-16.1%
American Indian and Alaska Native Alone	0.2%	0.2%	0.2%	-4.5%
Asian Alone	2.0%	2.4%	2.4%	26.7%
Native Hawaiian and Other Pacific Islander Alone	0.2%	0.8%	0.0%	-100.0%
Some Other Race	0.3%	0.4%	0.1%	-77.4%
Two or More Races	1.5%	1.5%	1.1%	-21.1%
Source: American Community Survey, 5-Year Estimates, 2019.				

C. Economic Characteristics

Income levels and economic characteristics vary throughout Rialto and generate different demands on total numbers and types of housing units. Need at different income levels necessitates a diverse housing stock.

1. Employment and Wage Scale

Employment and income affect the ability for the population to purchase housing. Employment and income also influence the types of housing people may purchase. **Table 2-5** summarizes projected employment growth for Rialto and its surrounding cities along with San Bernardino County from 2012 to 2040. Rialto is forecast a total employment growth of 40.6 percent between 2012 and 2040 (approximately 9,400 new jobs). This is the lowest forecasted growth compared to nearby cities and San Bernardino County. The City of Colton is projected the largest employment growth at approximately 74 percent.

Table 2-5: Employment Growth (2012-2040)							
Jurisdiction	2012	2020	2035	2040	Percent Change 2012-2020	Percent Change 2020-2040	Numeric Change 2012-2040
Fontana	47,000	55,400	68,900	70,800	17.9%	27.8%	23,800
Rialto	**21,100**	**24,400**	**29,800**	**30,500**	**15.6%**	**25.0%**	**9,400**
San Bernardino	88,900	102,500	125,200	128,900	15.3%	25.8%	40,000
Colton	16,800	21,100	28,100	29,200	25.6%	38.4%	12,400
San Bernardino County	659,000	789,000	998,000	1,028,000	19.7%	30.3%	369,000
Source: SCAG 2016-2040 Regional Growth Forecast by Jurisdiction Report.							

Analyzing trends in employment by industry helps to understand income wages and housing needs. **Table 2-6** shows 2010 and 2019 ACS employment data for Rialto by industry. Of Rialto's employed population, the largest portion worked in the Education Services, Health Care, and Social Assistance sector at a rate of 16.9 percent. The Rialto population also has high rates of employment in the Transportation and Warehousing and Utilities industry (14.8 percent) and the Retail Trade industry (13.7 percent).

Table 2-6: Employment by Sector (2010-2019)					
Industry Sector	2010		2019		Percent Change 2010-2019
	People Employed	Percent of City Employed Population	People Employed	Percent of City Employed Population	
Agriculture, forestry, fishing and hunting, and mining	204	0.5%	413	0.9%	102.5%
Construction	2,638	6.6%	3,756	8.4%	42.4%
Manufacturing	4,595	11.5%	3,939	8.8%	-14.3%
Wholesale trade	1,662	4.2%	1,785	4.0%	7.4%
Retail trade	5,959	14.9%	6,171	13.7%	3.6%
Transportation and warehousing, and utilities	4,170	10.4%	6,648	14.8%	59.4%
Information	533	1.3%	573	1.3%	7.5%
Finance and insurance, and real estate and rental leasing	1,430	3.6%	1,769	3.9%	23.7%
Professional, scientific, management, and administrative services	3,672	9.2%	3,772	8.4%	2.7%
Education services, health care, and social assistance	7,479	18.7%	7,593	16.9%	1.5%
Arts, entertainment, recreation, accommodation, and food services	3,499	8.8%	4,101	9.1%	17.2%
Other services (except public administration)	2,255	5.6%	2,469	5.5%	9.5%
Public Administration	1,855	4.6%	1,931	4.3%	4.1%
Total	**39,951**	**100%**	**44,920**	**100%**	**12.4%**
Source: American Community Survey, 5-Year Estimates, 2010 and 2019.					

Between 2010 and 2019, Rialto's employment grew by 12.4 percent. While increased participation in the labor force is important, unemployment is also important. Despite the growth in unemployment, **Table 2-7** shows the City of Rialto has the highest unemployment rate in 2019 at 10.6 percent compared to neighboring cities and San Bernardino County. Fontana has the lowest unemployment rate at 6.9 percent, which is 4 percent less than Rialto.

Table 2-7: Unemployment Rate (2019)

Jurisdiction	Unemployment Rate [1]
Fontana	6.9%
Rialto	**10.6%**
San Bernardino	9.2%
Colton	7.1%
San Bernardino County	7.7%

1. Of the population 16 years and over.

Source: American Community Survey, 5-Year Estimates, 2019.

D. Household Characteristics

1. Household Growth

A household consists of people who occupy a housing unit. This could include single occupants, families, or unrelated people living together. According to ACS, Rialto had 26,033 households in 2019. Overtime, the City's number of households have grown. The SCAG Regional Growth Forecast between 2012 and 2040 are shown in **Table 2-8**. While the City of Rialto's households are forecast to increase by about 24 percent, this is the lowest growth percentage compared to neighboring cities.

Table 2-8: Household Growth Forecast by Jurisdiction (2012-2040)

Jurisdiction	2012	2020	2035	2040	Percent Change 2012-2040
Fontana	49,600	53,500	70,000	74,000	49.2%
Rialto	**25,400**	**28,000**	**31,000**	**31,500**	**24%**
San Bernardino	59,300	68,900	76,600	77,100	30%
Colton	15,000	17,600	20,400	20,800	38.7%
San Bernardino County	615,000	687,000	825,000	854,000	38.9%

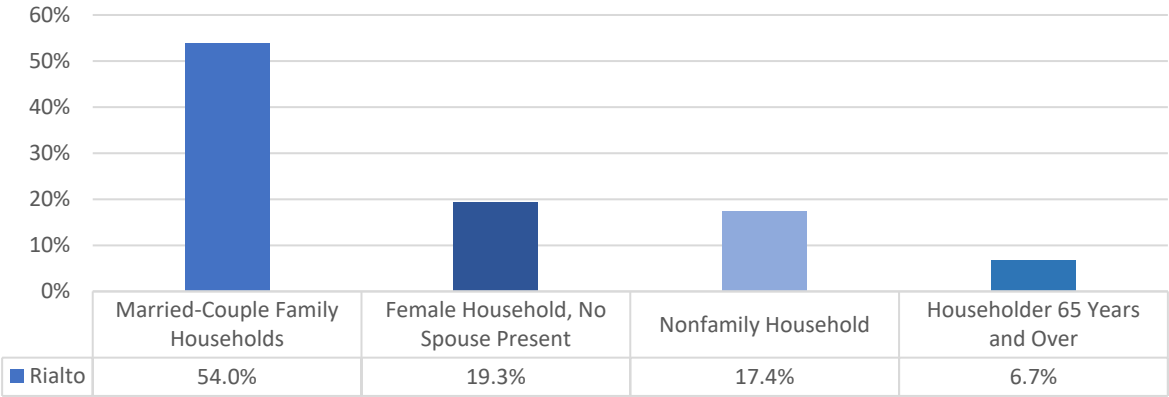
Source: SCAG 2016-2040 Regional Growth Forecast by Jurisdiction Report

2. Household Type

Table 2-9 and **Figure 2-2** display ACS household data from 2019 compared to nearby cities. The ACS reported a total of 26,033 households in Rialto in 2019. Over half of these households are married-couple family households. Just under 20 percent of Rialto households are female households, with no spouse present. The housing needs of female households with no spouse present are further analyzed in the Special Population Groups section. Non-family households represent 17.4 percent of total Rialto households. Non-family households include persons living alone and those living with roommates. Persons living with roommates may be at higher risk of overcrowding to lower the cost of housing and may benefit from affordable housing options.

Table 2-9: Household Characteristics							
Jurisdiction	Married-Couple Family Households	Percent of Total Households	Female Households, No Spouse Present	Percent of Total Households	Non-Family Households	Percent of Total Households	Total Households
Fontana	32,978	60.4%	9,720	17.8%	7,857	14.4%	54,558
Rialto	**14,048**	**54.0%**	**5,030**	**19.3%**	**4,532**	**17.4%**	**26,033**
San Bernardino	24,630	41.5%	14,205	24.0%	14,636	24.7%	59,295
Colton	8,155	48.9%	3,521	21.1%	3,851	23.1%	16,689
San Bernardino County	331,235	52.1%	107,779	16.9%	149,756	23.5%	636,041
Source: American Community Survey, 5-Year Estimates, 2019.							

Figure 2-2: Rialto Household Characteristics



Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-10 summarizes changes in household types between 2010 and 2019. Married-couple family households represented the largest household type between 2010 and 2019 but decreased slightly by 0.2 percent over the nine years. Conversely, female households with no spouse present increased by about 11.5 percent. Nonfamily households and senior-led households also increased by 5.6 percent and 17.6 percent, respectively.

Table 2-10: Changes in Household Types (2010-2019)							
Household Type	2010	Percent	2015	Percent	2019	Percent	% Change 2010-2019
Total Households	24,716	100%	25,199	100%	26,033	100%	5.3%
Married-Couple Family Households	14,080	57.0%	13,980	55.5%	14,048	54.0%	-0.2%
Female Household, No Spouse Present	4,511	18.3%	4,840	19.2%	5,030	19.3%	11.5%
Nonfamily Household	4,290	17.4%	4,286	17.0%	4,532	17.4%	5.6%
Householder 65 Years and Over	1,483	6.0%	1,411	5.6%	1,744	6.7%	17.6%
Source: American Community Survey, 5-Year Estimates, 2010, 2015, 2019.							

3. Household Size

Persons per household and household size are important characteristics as they indicate a need for large housing units to prevent overcrowding. As shown in **Table 2-11**, Rialto has an average persons per household of 3.94. This is the largest compared to surrounding cities and San Bernardino County. **Table 2-12** shows how household sizes have changed between 2010 and 2019. Since 2010, two person households have increased the most (18.9 percent), while households with at least 4 persons are the only to have decreased. Overall, the total average persons per household in Rialto has decreased by 1.75 percent from 4.01 persons per household in 2010 to 3.94 persons per household in 2019.

Table 2-11: Average Household Size

Jurisdiction	Average Persons per Household
Fontana	3.85
Rialto	**3.94**
San Bernardino	3.46
Colton	3.25
San Bernardino County	3.29

Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-12: Average Household Size (2010-2019)

Household Size	2010	2015	2019	Percent Change 2010-2019
1 Person	14.2%	13.3%	14.1%	4.9%
2 Persons	17%	19%	19.2%	18.9%
3 Persons	16.4%	16.9%	17.5%	12.3%
4-or-More Persons	52.4%	50.9%	49.2%	-1.1%
Average Persons Per Household	**4.01**	**4.02**	**3.94**	**-1.75%**

Source: American Community Survey, 5-Year Estimates, 2010, 2015, 2019

Household size differs between renter and owner-occupied housing units. Owner-occupied units tend to be larger households compared to renter-occupied units. Homeowners typically have a greater income than renters and therefore have more expendable income to afford purchasing a home. In addition, family households generally occupy larger housing units such as single-unit homes. The City of Rialto housing stock includes 63.4 percent owner occupied housing units and 36.6 percent renter occupied housing units, as shown in **Table 2-13**. The large majority of owner-occupied homes are single-unit detached structures, while renter-occupied households are more commonly multi-unit developments.

As **Table 2-14** shows, the City of Rialto has larger household sizes in comparison to neighboring cities. An average household size of 3.94 indicates a need for large housing units. The average household size for owner and renter households in Rialto are similar (3.98 and 3.85, respectively). The City of Colton has the lowest household size at 3.25 and a renter occupied household size of 3.12. San Bernardino County's overall household size of 3.29 reflects almost an entire person difference with Rialto.

Table 2-13: Occupied Housing Units by Type and Tenure					
Tenure	Single-Unit Detached	Single-Unit Attached	Multi-Unit	Mobile Homes	Total Occupied Units
Owner Occupied	90.1%	1.5%	1.0%	7.5%	16,515
Renter Occupied	38.8%	2.8%	55.1%	3.3%	9,518
Source: *American Community Survey, 5-Year Estimates, 2019.*					

Table 2-14: Average Household Size by Tenure			
Jurisdiction	Owner Occupied Household Size	Renter Occupied Household Size	Average Household Size
Fontana	3.9	3.77	3.85
Rialto	3.98	3.85	3.94
San Bernardino	3.56	3.37	3.46
Colton	3.37	3.12	3.25
San Bernardino County	3.31	3.27	3.29
Source: *American Community Survey, 5-Year Estimates, 2019.*			

4. Household Income

Household income is directly connected to affordability. The ability to afford a higher priced housing unit typically increases as household income increases. This may include increased access to a larger sized unit and/or the ability to move from a rental to an ownership opportunity. However, lower income households are more likely to utilize a disproportionate amount of their income toward housing costs. This may result in incidences of overcrowding and substandard living conditions.

The California State Department of Housing and Community Development (HCD) identifies the following income categories based on the Median Family Income (MFI) of San Bernardino County:

- **Very Low-Income**: households earning between 0 and 50 percent of the MFI
- **Low-Income**: households earning between 51 percent and 80 percent of the MFI
- **Moderate Income**: households earning between 81 percent and 120 percent of the MFI
- **Above Moderate Income**: households earning over 120 percent of the MFI

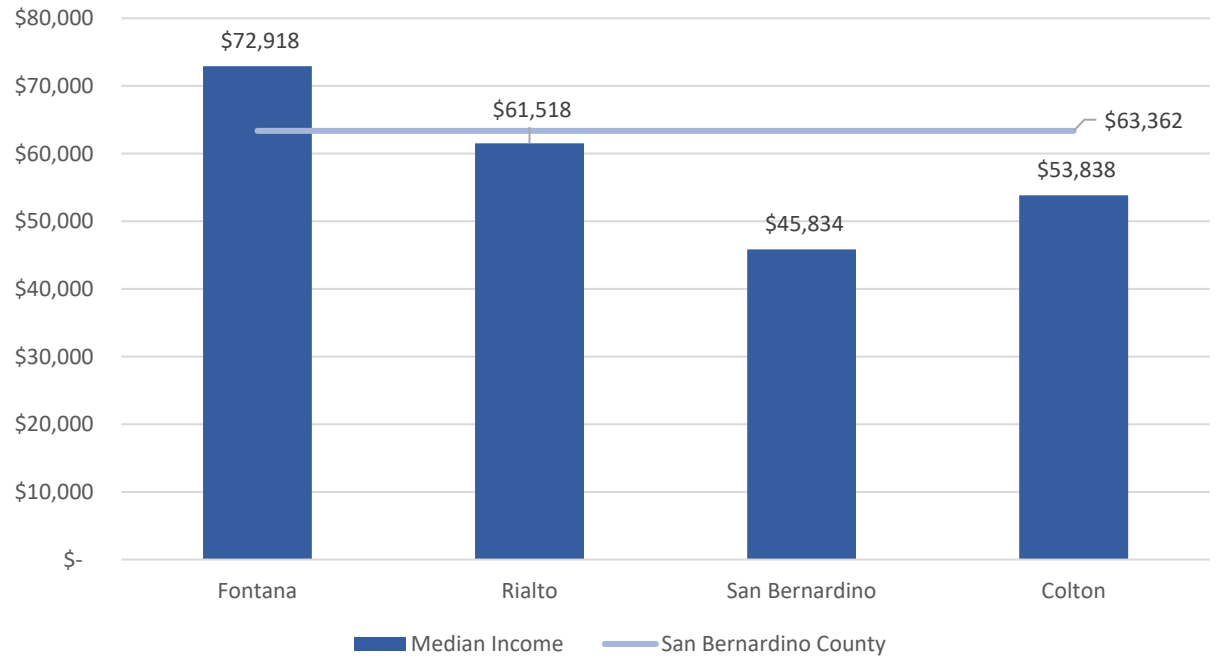
State law also defines extremely low-income as households earning less than 30 percent of the MFI and are considered a subset of the very low-income category. Lower income groups refer to extremely low, very low, and low-income groups.

Rialto's household income characteristics can help to identify housing types that would be affordable to the City's population. Income characteristics assist in determining what housing types and characteristics are required to meet the needs of a population. **Table 2-15** shows that lower income categories represent 44.7 percent of households in Rialto. Moderate to above moderate-income households represent 55.3 percent of Rialto households.

Table 2-15: Households by Income Category in Rialto		
Income Category (Percent of County MFI)	Households	Percent
Extremely Low (30% MFI or less)	2,920	11.2%
Very Low (30% to 50% MFI)	3,560	13.7%
Low (50% to 80% MFI)	5,140	19.8%
Moderate or Above (Over 80% MFI)	14,395	55.3%
Total	26,015	100%
Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.		

Figure 2-3 illustrates the differences in annual median income for Rialto and surrounding cities in comparison to San Bernardino County. The median household income in Rialto is just below the regional household income for San Bernardino County. Market-rate housing within the immediate area may consequently be unaffordable to the significant number of lower income households in Rialto. This is also true for the nearby cities of San Bernardino and Colton.

Figure 2-3: Median Household Income by City (2019)



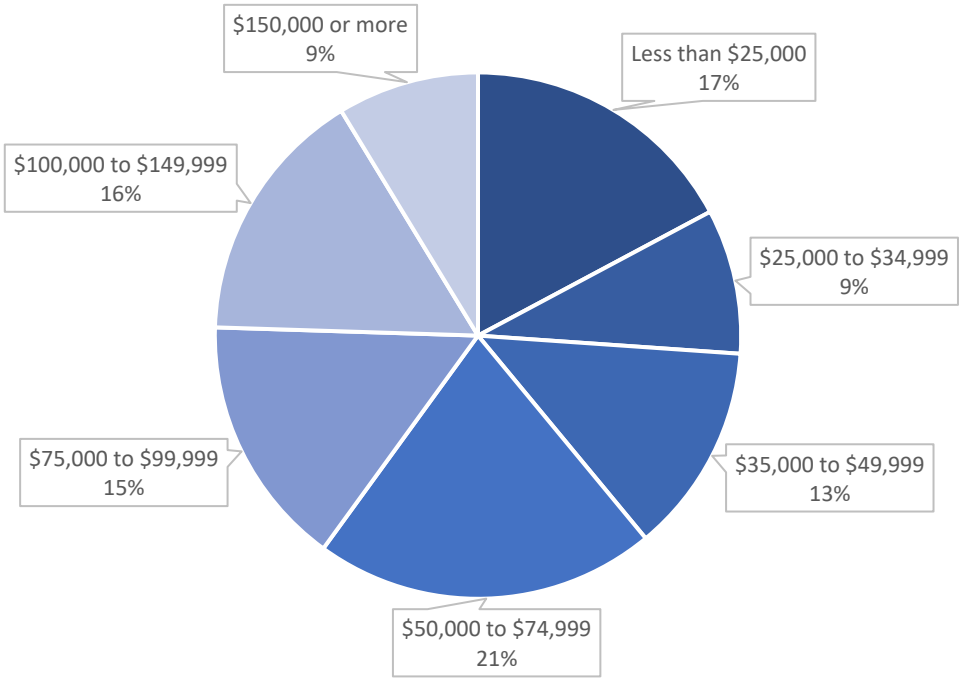
Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-16 below shows the median household income in Rialto is approximately 2.9 percent lower than the regional median. Rialto's median income is $61,518 and represents the second largest median income. The City of San Bernardino has the lowest median income at 27.7 percent below the regional median income and $15,684 below Rialto's median income.

About a quarter of Rialto households earn over $100,000 annually, as illustrated in **Figure 2-4**. Conversely, 39 percent earn below $50,000. Households that earn between $50,000 and $99,999 represent an estimated 36 percent of the City's population.

Table 2-16: Median Household Income		
Jurisdiction	Median Income	Percent Above/Below Regional Median
Fontana	$72,918	15.1%
Rialto	**$61,518**	**-2.9%**
San Bernardino	$45,834	-27.7%
Colton	$53,838	-15.0%
San Bernardino County	$63,362	--
Source: American Community Survey, 5-Year Estimates, 2019.		

Figure 2-4: Rialto Income Breakdown by Category



Source: American Community Survey, 5-Year Estimates, 2019.

E. Housing Problems

The Census Bureau's Comprehensive Housing Affordability Strategy (CHAS) provides detailed information on housing needs for different income levels and household type in Rialto. The most recent CHAS data for Rialto was published in August 2020 and was based on 2013-2017 ACS data (**Table 2-17**). Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burdens, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burdens, including utilities, exceeding 50 percent of gross income.

Half of all Rialto households live with at least one housing problem and 30 percent live with at least one severe housing problem. **Table 2-17** shows that more renters experience housing problems compared to homeowners. About 68 percent of Rialto renters experience at least one housing problem and just under half experience at least one severe housing problem (45.4 percent). In contrast, 41.1 percent of

homeowners experience at least one housing problem and under a quarter experience at least one severe housing problem (22.5 percent).

Table 2-17: Housing Assistance Needs of Lower Income Households

Housing Problem Overview**	Number of Owner HH	Percent of Owner HH	Number of Renter HH	Percent of Renter HH	Number of HH	Percent of All HH
Household has at least 1 of 4 Housing Problems	6,795	41.1%	6,415	67.6%	13,210	50.8%
Household has none of 4 Housing Problems	9,630	58.3%	2,980	31.4%	12,610	48.5%
Cost Burden not available, no other problems	95	0.6%	95	1.0%	190	0.7%
Total	16,520	100.0%	9,490	100.0%	26,015	100.0%
Severe Housing Problem Overview* **	**Number of Owner HH**	**Percent of Total HH**	**Number of Renter HH**	**Percent of Total HH**	**Number of HH**	**Percent of All HH**
Household has at least 1 of 4 Severe Housing Problems	3,725	22.5%	4,310	45.4%	8,035	30.9%
Household has none of 4 Severe Housing Problems	12,700	76.9%	5,085	53.6%	17,785	68.4%
Cost Burden not available, no other problems	95	0.6%	95	1.0%	190	0.7%
Total	16,520	100.0%	9,490	100.0%	26,015	100.0%

* Percent of total households

** The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.

*** The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2013-2017.

1. Overcrowding

Overcrowded households include more than one occupant per room (excluding bathrooms, kitchens, hallways, and porches). Severely overcrowded households have more than 1.5 persons per room. Factors that may cause overcrowding include a lack of affordable housing and/or a lack of available housing units of adequate size.

Overcrowding in households can lead to neighborhood deterioration. This is due to the intensive use of individual housing units which results in excessive wear and tear, and the potential cumulative overburdening of community infrastructure and service capacity. Overcrowding in neighborhoods can lead to an overall decline in social cohesion and environmental quality. Such decline may spread geographically and impact the quality of life, the economic value of property, and the vitality of commerce within a city. The combination of lower incomes and high housing costs may result in households living in overcrowded housing conditions.

Table 2-18 shows that renters are disproportionately impacted by overcrowding. About 17.3 percent of rental units in Rialto are overcrowded and 5.9 percent of rental units are severely overcrowded. About

8.5 percent of owner-occupied units are overcrowded and just under 2 percent of owner-occupied units are severely overcrowded units. A quarter of all occupied housing units are overcrowded, and 7.8 percent are severely overcrowded. Total overcrowded units represent 33.7 percent of Rialto households.

Table 2-18: Overcrowding by Tenure, Rialto

Tenure	Overcrowded Units (1.0 to 1.5 persons/room)		Severely Overcrowded Units (>1.51 persons/room)		Total Overcrowded Occupied Units	
	Count	Percent[1]	Count	Percent[1]	Count	Percent[1]
Owner Occupied	1,412	8.5%	312	1.9%	1,724	10.4%
Renter Occupied	1,649	17.3%	564	5.9%	2,213	23.3%
Total	**3,061**	**25.9%**	**876**	**7.8%**	**3,937**	**33.7%**

1. Percent of total occupied housing units.
Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-19 shows that overcrowding disproportionately affects renters in surrounding cities and in San Bernardino County. Rialto renters are disproportionately impacted by overcrowding, but homeowners in Rialto have the highest percentage of overcrowding compared to nearby cities and the County.

Table 2-19: Overcrowded Housing Units by Tenure

Jurisdiction	Owner Occupied Overcrowded Units (>1.0 persons/room)		Renter Occupied Overcrowded Units (>1.0 persons/room)		Total Overcrowded Units	
	Count	Percent of Occupied Units	Count	Percent of Occupied Units	Count	Percent of Occupied Units
Fontana	2,764	5.1%	3,736	6.9%	6,500	11.5%
Rialto	**1,724**	**6.6%**	**2,213**	**8.5%**	**3,937**	**14.5%**
San Bernardino	2,808	4.7%	6,426	10.8%	9,234	14.6%
Colton	646	3.9%	1,362	8.2%	2,008	10.7%
San Bernardino County	20,629	3.2%	35,649	5.6%	56,278	7.8%

Source: American Community Survey, 5-Year Estimates, 2019.

2. Overpayment (Cost Burden) in Relation to Income

State and federal standards indicate that a household paying more than 30 percent of its income for housing is overpaying. A household paying over 50 percent of its total income is severely overpaying. Overpayment (also referred to as cost burden) is an indicator of a household's ability to sustain a household budget including expenses beyond housing such as utilities, food, and maintenance. Households that pay an excessive amount of their income on housing costs have less remaining for other needs. This is an important indicator of local housing market conditions as it reflects the affordability of housing in the community. Federal and state agencies use overpayment indicators to determine the amount of funding to allocate a community to assist with housing opportunities.

Table 2-20 below summarizes housing overpayment in Rialto's households by household income. About 22 percent of homeowners and 20 percent of renters have a cost burden of greater than 30 percent.

Table 2-20: Summary of Housing Overpayment								
Income by Cost Burden[1]	Homeowners				Renters			
	Cost Burden > 30%	Percent[2]	Cost Burden > 50%	Percent[2]	Cost Burden > 30%	Percent[2]	Cost Burden > 50%	Percent[2]
Extremely Low Income (≤ 30% MFI[3])	755	2.9%	655	2.5%	1,680	6.5%	1,470	5.7%
Very Low Income (>30% to ≤ 50% MFI[3])	1,120	4.3%	705	2.7%	1,750	6.7%	1,080	4.2%
Low Income (>50% to ≤ 80% MFI[3])	1,625	6.2%	585	2.2%	1,300	5.0%	225	0.9%
Moderate Income (>80% to ≤ 100% MFI[3])	985	3.8%	110	0.4%	270	1.0%	20	0.1%
Above Moderate Income (>100% MFI[3])	1,105	4.2%	105	0.4%	290	1.1%	0	0.0%
Total	5,590	21.5%	2,160	8.3%	5,290	20.3%	2,795	10.7%

1. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.
2. Percent of total households in Rialto
3. MFI refers to the HUD Area Median Family Income – this is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made.
Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

F. Special Needs Groups

Special needs groups may encounter added difficulty in procuring adequate and affordable housing. Special needs populations include seniors, persons with disabilities, large households, single parent households, students, and farm workers. Special needs groups may have lower incomes or may be homeless.

Table 2-21: Special Needs Groups			
Special Needs Groups	Count	Percent of Total Households	Percent of Total Population
Total Senior Population	16,124	--	10.60%
Persons with Disabilities	16,631 persons	--	11%
Persons with Developmental Disabilities[1]	274 persons	--	--
Large Households	10,111 HH	25.90%	--
Single-Parent Households	4,768 HH	12.20%	--
Single-Parent, Female Headed Households with Children (under 18 years)	3,271 HH	8.40%	--
People Living in Poverty	26,511	--	17.90%
Farmworkers[2]	703 persons		1%
Migrant Farmworkers	395 persons	--	--
Seasonal Farmworkers	1,044 persons	--	--
Permanent Farmworkers	1,061 persons	--	--
Persons Experiencing Homelessness[3]	722 persons	--	--

1. Total persons who received service from the Inland Regional Center for FY 2018-2019.
2. Agriculture, forestry, fishing and hunting, and mining industry. Farmworker data is taken of the population 16 years and over. Data taken at the County level and provided by USDA Statistics Services.
3. Total results from 2020 homeless count by Los Angeles Homeless Services Authority (LAHSA).

Source: American Community Survey, 5-Year Estimates, 2019; San Bernardino County Regional Center *Total Annual Expenditures and Authorized Services Report, 2019-2020; United States Department of Agriculture, National Agriculture Statistics – Hired Farm Labor, 2017;* Los Angeles Homeless Services Authority 2020 Homeless County by Community/City.

1. Seniors

Seniors include individuals 65 years old or older. Seniors may have limited incomes due to retirement payments and high healthcare costs. Seniors are also more susceptible to mobility issues and self-care limitations due to their age. Housing needs of the senior population include affordable housing, supportive housing (such as intermediate care facilities), group homes, and other housing with a planned service component. **Table 2-22** provides population counts of seniors in Rialto, neighboring cities, and San Bernardino County. Rialto's senior population is 9.3 percent which is similar to nearby cities but lower than the County average of 11.3 percent.

Table 2-22: Persons Age 65 and Over		
Jurisdiction	Population Count	Percent of Population
Fontana	16,448	7.8%
Rialto	**9,611**	**9.3%**
San Bernardino	19,356	9%
Colton	5,687	10.4%
San Bernardino County	241,961	11.3%
Source: American Community Survey, 5-Year Estimates, 2019.		

Key Challenges and Resources to Address Senior Housing Needs

Additional affordable housing would benefit senior residents since they often have fixed incomes that may not allow for the financial flexibility necessary to acquire suitable housing. In addition to overpayment problems faced by seniors due to their relatively fixed incomes, many seniors are faced with various disabilities. Smaller, more affordable housing units allow for a greater accommodation of their lifestyles.

The City owns the Grace Vargas Senior Center and partners with the non-profit organization Friends of the Rialto Senior Center to offer programs, activities, and resources to seniors living in the City. Additional senior services and assistance are offered regionally through the San Bernardino County Department of Aging and Adult Services as well as AgingNext and NewStart Housing Corporation. AgingNext is a nonprofit organization in Claremont which provides free or low-cost programs, services, and resources to the aging community. NewStart Housing Corporation Inc. is a community housing development organization (CHDO) in Fontana which provides quality affordable housing to low-income seniors.

Seniors in Rialto generally have exhibited the following unique challenges to housing:

- Having Limited and fixed incomes
- Disproportionately higher healthcare costs, adding to monthly living costs
- Higher incidence of mobility and self-care limitations requiring customized housing features
- Transit dependency
- Limited in-home support, due to living alone
- To address these challenges, the City must consider a variety of solutions to address the above issues. These may include:
- More affordable housing options for Seniors
- Supportive City programs to help sustain decent, safe, and affordable housing for dependent Seniors
- Housing with included supportive services
- Group Homes options for persons with self-care limitations
- To address unique needs of senior residents living in the City, the following programs have been included in **Section 4**: **Housing Program 1A:** Acquisition, Rehabilitation, and Resale Program
- **Housing Program 1B:** Funding for Housing Rehabilitation Programs
- **Housing Program 3B:** Preserve and Monitor At-Risk Units
- **Housing Program 3F:** County Housing Voucher Program
- **Housing Program 3G:** Tenant-Based Rental Assistance
- **Housing Program 5A:** Affirmatively Furthering Fair Housing
- **Housing Program 5B:** Fair Housing Services
- **Housing Program 5C:** Reasonable Accommodation
- **Housing Program 5H:** Residential Care Facilities

The City will continue providing housing resources to its senior population through community partnerships and by facilitating the development of affordable housing.

2. Persons with Physical and Developmental Disabilities

Physical and developmental disabilities can hinder access to traditional housing units and may limit the ability to earn adequate income. Physical and/or developmental disabilities may deprive a person from earning income, restrict one's mobility, or make self-care difficult. Persons with disabilities often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. Some residents may also have disabilities that require living in a supportive or assisted-living setting.

Table 2-23 summarizes disability status among Rialto's noninstitutionalized residents. Ambulatory difficulty is the most widespread in Rialto and represent 27.2 percent of those with a disability. Ambulatory difficulties affect walking and movement. The second most common disability type is cognitive difficulty affecting 21.4 percent of those with a disability. Vision difficulties are the least common. Disabilities require different living conditions which inform housing needs for Rialto. For example, those with ambulatory difficulties may require smaller single-story spaces due to a lack of ability to walk long distances or without assistance. Affordable and barrier-free housing may provide adequate housing opportunities for persons with disabilities. Rehabilitation assistance can target renters and homeowners with disabilities to modify and improve unit accessibility.

State law requires that the Housing Element discuss the housing needs of persons with developmental disabilities. As defined by federal law, "developmental disability" means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self- sufficiency; and
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

According to the Inland Regional Center *Purchase of Service – Disparity Data Report for 2018-2019*, a total of 274 individuals from the Inland Empire and diagnosed with developmental disabilities received services. Of the 274 individuals, the majority were diagnosed with Autism (78.8 percent). The rest were diagnosed with an intellectual disability (4.4 percent), Cerebral Palsy (1.8 percent), Epilepsy (0.4 percent), Category 5 (3.6 percent), and 10.9 percent reported some other disability. Of those who received services, 25.5 percent were White, 9.5 percent were Asian, 3.3 percent were Black/African American, and 29.9 percent reported Other. Approximately 32 percent of individuals reported their ethnicity as Hispanic or Latino. The majority of those who received services were 3 to 21 years of age (77.7 percent), 21.5 percent were 2 years or younger, and less than 1 percent were over the age of 22. All individuals who received services live at the home of their parent(s) or guardian(s).

Many people with developmental disabilities can live and work independently within a conventional housing environment. Individuals with more severe developmental disabilities may require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. The first issue in supportive housing for persons with developmental disabilities is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

There are several housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 (veterans) homes. The design of housing-

accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving the needs of this group. Incorporating 'barrier-free' design in all new multi-family housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for residents with disabilities. Special consideration may also be given to the affordability of housing as people with disabilities may be living on a fixed income.

The County of San Bernardino's Aging and Disability Resource Connection (ADRC) program serves persons with disabilities with information and access to available long-term services and support at the local level. The ADRC works in partnership with Rolling Start Inc. which is a cross-disability Center for Independent Living in San Bernardino that provides community-based programs and services to people of any age with disabilities. Additional ADRC partners that serve persons with disabilities in San Bernardino County include: California State Council on Developmental Disabilities, Housing Authority of the County of San Bernardino, Inland Regional Center, Services for Independent Life, and more.

Key Challenges and Resources to Address Housing Needs of Disabled Persons

Persons with physical and developmental disabilities in Rialto have exhibited the following unique challenges to housing:

- Need for specialized housing to accommodate disabilities
- Need for supportive services
- Higher incidents of dependent living needs
- High incidents of unemployment

To address these challenges, the City must consider a variety of solutions to address the above issues. These may include:

- Regional coordination and support for services
- Permitting of housing for persons with disabilities
- Prioritization of services for disabled persons
- Local supportive services to supplement physical housing needs
- Housing regulations/accommodation of unique housing needs
- Group Home options for persons with self-care limitations

The City's existing permit procedures, regulations and policies further support physical and developmental disabilities through the granting of uses and facilities to accommodate the needs of persons with disabilities. The City also has a reasonable accommodation procedure that is intended to grant accommodations for persons with disabilities with the expressed intent not to cause additional cost to the requestee.

The City will review and prioritize housing and supportive services for persons with developmental disabilities, as well as explore regulatory incentives for projects that address the needs of persons with developmental disabilities.

To address unique needs of disabled residents living in the City, the following programs have been included in **Section 4**:

- **Housing Program 5C:** Reasonable Accommodation
- **Housing Program 5F:** Housing for Persons with Developmental Disabilities
- **Housing Program 5H:** Residential Care Facilities
- **Housing Program 5A:** Affirmatively Furthering Fair Housing
- **Housing Program 3F:** County Housing Voucher Program

These programs focus on providing funding and incentives to encourage the development and rehabilitation of housing for persons with developmental disabilities as well as continued promotion of the City's Reasonable Accommodation Ordinance which grants accommodations to meet the needs of persons with disabilities.

3. Large Households

Large households are made up of five or more individuals. Procuring resources for a large household requires a greater portion of income. This may lead households to smaller, more affordable housing units. Such units may not be large enough to adequately contain a large household and may become overcrowded. Multi-family rental units are typically smaller than single-family ownership units. Therefore, renters typically have more difficulty securing larger housing units.

In Rialto, large households represent about 30.9 percent of all households, as shown in **Table 2-24** and the majority live in owner-occupied units (65.6 percent). **Table 2-25** shows that while large households represent a larger percentage in Rialto than neighboring cities, the occurrence is decreasing. Between 2010 and 2019, large households in Rialto decreased by 2.3 percent. In contrast, San Bernardino County experienced a growth of 3.5 percent in large households. The provision of affordable and large housing units may alleviate potential overcrowding burdens experienced by homeowners and renters in Rialto.

Table 2-24: Large Households by Tenure

Household Size	Owner		Renter		Total	
	Count	Percent (1)	Count	Percent (1)	Count	Percent (1)
5-Person Household	2,618	10.1%	1,212	4.7%	**3,830**	14.7%
6-Person Household	1,456	5.6%	697	2.7%	**2,153**	8.3%
7-or-More Person Household	1,201	4.6%	861	3.3%	**2,062**	7.9%
Total	**5,275**	**20.3%**	**2,770**	**10.6%**	**8,045**	**30.9%**

1. Percent of large households.
2. Percent of total households.
Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-25: Large Households by Jurisdiction (2010-2019)				
Jurisdiction	Total Large Households			Percent Change 2010-2019
	2010	2015	2019	
Fontana	32.7%	31.7%	29.3%	4.5%
Rialto	**33.3%**	**31.7%**	**30.9%**	**-2.3%**
San Bernardino	21.7%	24.3%	24.0%	7.6%
Colton	22.5%	22.2%	18.2%	-11.1%
San Bernardino County	20.5%	19.7%	19.8%	3.5%
Source: American Community Survey, 5-Year Estimates, 2010, 2015, 2019.				

Resources to address the needs of large households include Housing Programs that support the leveraging of LIHTC opportunities, State, Federal and private funds focused on the development of affordable housing for large households and other special needs groups. The City has included **Housing Programs 1A** and **3B** that will secure funding and rehabilitate foreclosed units to be rented as affordable housing.

In addition, accessory dwelling units (ADU) are detached dwelling units, that allow for complete independent living facilities for one or more persons. The City's Zoning Code permits ADUs in all residential zoning districts. ADUs can provide additional housing for households who may be experiencing overcrowding. **Section 4** of this Housing Element includes **Housing Program 2D** which establishes that the City will support and accommodate the construction of at least 72 ADUs over the planning period for the 6th Cycle.

Key Challenges and Resources to Address Large household Housing Needs

Large Person Households in Rialto have exhibited the following unique challenges to housing:

- Lack of available housing with sufficient bedroom counts
- Options for larger bedroom counts in rental units
- Higher monthly cost burdens
- Affordable options for large family households
- Childcare needs for working families

To address these challenges, the City must consider a variety of solutions to address the above issues. These may include:

- Permitting of larger bedroom counts in ownership and rental units
- Affordable housing options for large family households
- Prioritization of family-sized units in affordable housing developments
- Leveraging of Grant/Funding opportunities

Resources to address the above needs include Policy Actions that support the leveraging of State, Federal and private funds focused on multiple family development.

The City has included the following programs that will provide standards and provisions that will support the provision of larger sized family units:

- **Housing Program 1A:** Acquisition, Rehabilitation, and Resale Program
- **Housing Program 1B:** Funding for Housing Rehabilitation Programs
- **Housing Program 1D:** Multi-Family Improvement Districts
- **Housing Program 2N:** Alternative Housing Concepts
- **Housing Program 3B:** Preserve and Monitor At-Risk Units
- **Housing Program 3F:** County Housing Voucher Program
- **Housing Program 3G:** Tenant-Based Rental Assistance
- **Housing Program 4A:** Density Bonus
- **Housing Program 5A:** Affirmatively Furthering Fair Housing
- **Housing Program 5B:** Fair Housing Services
- **Housing Program 5E:** Supportive Housing / Low Barrier Navigation Centers

4. Single-Parent Households

Single parent households tend to have a greater need for childcare services, health care services, and other services. **Table 2-26** estimates that single-parent female households with no spouse make up 19.3 percent of Rialto households. In Rialto, single parent-female households without a spouse present are disproportionately impacted by poverty. About 15.6 percent of Rialto households are female headed households earning an annual income below the poverty line. In comparison, male headed households living under the poverty line represent less than one percent.

Table 2-26: Single-Parent Households

Jurisdictions	Single Parent-Male, No Spouse Present		Single Parent-Male Household Living in Poverty		Single Parent-Female, No Spouse Present		Single Parent-Female Household Living in Poverty	
	Count	Percent[1]	Count	Percent[1]	Count	Percent[1]	Count	Percent[1]
Rialto	2,423	9.3%	186	0.7%	5,030	19.3%	4,053	15.6%
San Bernardino County	47,271	7.4%	12,514	2.0%	68,643	10.8%	107,779	16.9%

1. Percent of total households.
Source: American Community Survey, 5-Year Estimates, 2019.

Key Challenges and Resources to Address Single-Parent Housing Needs

Single Parent Households in Rialto have exhibited the following unique challenges to housing:

- Affordable Housing Options
- Rental and For Sale Housing Options
- Higher monthly cost burdens with one income families
- Childcare needs for working families

To address these challenges, the City must consider a variety of solutions. These may include:

- Affordable housing options for single income families
- Accessibility to childcare options
- Leveraging of Grant/Funding opportunities

To address unique needs of Single-Parent households in the City, the following programs have been included in **Section 4**:

- **Housing Program 2D:** Accessory Dwelling Unit Construction
- **Housing Program 3B:** Preserve and Monitor At-Risk Units
- **Housing Program 3F:** County Housing Voucher Program
- **Housing Program 3G:** Tenant-Based Rental Assistance
- **Housing Program 5A:** Affirmatively Furthering Fair Housing

The City of Rialto provides a number of community programs and resources for children which may assist single-parent households. The Rialto community center offers preschool and daycare programs as well as a teen center and various youth sport actives to take care of children. Preston Preschool and Tiny Tots are daycare programs in Rialto for children ages two through kindergarten and the Teen Center is a drop-in recreational program open to students ages 11 to 17. The Teen Center offers homework assistance, leadership activities, social activities and allows teens the ability to participate in a variety of workshops.

5. Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farm laborers work in the fields, processing plants, or support activities on a generally year-round basis. The labor force is supplemented by seasonal workers when workload increases during harvest periods. Certain farms may hire migrant workers. Migrant workers have unique housing needs as their travel may prevent them from returning to their primary residence every evening. Farm workers also have special housing needs because they earn lower incomes than many other workers and move throughout the year from one harvest location to the next.

The United States Department of Agriculture, National Agriculture Statistics provides data on hired farm labor across the United States. The data is compiled at both a state and county levels. Within San Bernardino County, there were a total of 1,888 hired farm workers in 2017. A total of 1,579 are considered permanent, working 150 days or more and a total of 667 farmworkers were considered seasonal, working only 150 days or less. Additionally, San Bernardino County reported 106 total migrant farmworkers.

According to the California Employment Development Department, the average farm worker (Farming, Fishing, and Forestry Occupation) in San Bernardino County earned a median annual income of $25,723 in 2019. This annual income is considered part of the very low-income bracket for Rialto. Limited income may be exacerbated by farm worker's tenuous and/or seasonal employment status. These employees and their households may reside in severely overcrowded dwellings, in packing buildings, or in storage sheds. Future housing in Rialto may need to consider the needs of farm workers employed in and near the City.

Key Challenges and Resources to Address Farmworker Housing Needs

Farmworker households in Rialto have exhibited the following unique challenges to housing:

- Affordable housing options
- Higher incidents of cost burden for housing

- Rental and for sale housing options
- Childcare needs for working families

Like other special needs groups, farmworkers needs are focused on affordability of housing and access to services that support lower monthly overall costs. To address these challenges, the City must consider a variety of solutions to address the above issues. These may include:

- Affordable housing options for farmworkers
- Accessibility to childcare options
- Leveraging of grant/funding opportunities

To address unique needs of farmworker households in the City, the following programs have been included in **Section 4**:

- **Housing Program 5G:** Agricultural Employee and Farmworker Housing
- **Housing Program 5A:** Affirmatively Furthering Fair Housing

Like other special needs groups, farmworkers needs are focused on affordable housing and access to services that support lower monthly overall costs. **Section 4** includes a number of Housing Programs which promote the development of affordable housing units throughout the City as well as resources for households in need.

6. Extremely Low-Income Households and Poverty Status

The 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data indicates approximately 2,920 extremely low-income households live in Rialto. Extremely low-income households earn 30 percent or less of the median family income (MFI) for San Bernardino County. MFI stands for HUD Median Family Income. This is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number) due to a series of adjustments. Extremely low-income households earn less than 30 percent of the MFI. There are approximately 2,920 extremely low-income households in Rialto (renters and owners). **Table 2-27** below includes data characterizing affordability and cost burden for various income groups.

In Rialto, 770 extremely low-income households live in owner-occupied housing units and 1,675 extremely low-income households live in renter-occupied housing units with at least one of the four housing problems identified by CHAS. The housing problems are detailed above in the Housing Problems section.

Table 2-27: Housing Problems for all Households by Tenure			
Income by Housing Problem	Owner		
	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available, no other Housing Problem
Extremely Low Income (≤ 30% MFI)	770	130	95
Very Low Income (>30% to ≤ 50% MFI)	1,165	510	-
Low Income (>50% to ≤ 80% MFI)	1,805	1,190	-
Moderate Income (>80% to ≤ 100% MFI)	1,155	910	-
Above Moderate Income (>100% MFI)	1,895	6,895	-
Total	6,790	9,635	95
Income by Housing Problem	Renter		
	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available, no other Housing Problem
Extremely Low Income (≤ 30% MFI)	1,675	150	95
Very Low Income (>30% to ≤ 50% MFI)	1,750	130	-
Low Income (>50% to ≤ 80% MFI)	1,690	455	-
Moderate Income (>80% to ≤ 100% MFI)	400	525	-
Above Moderate Income (>100% MFI)	895	1,720	-
Total	6,410	2,980	95

* The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.
** The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.
Source: Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2013-2017.

The values shown in **Table 2-28a** show potential differences in housing needs based on poverty status for different racial and ethnic groups within the City. While poverty levels across different racial and ethnic groups are fairly even in Rialto, certain racial and ethnic groups have higher percentages of population living below the poverty line in comparison to population representation as a whole. American Indian/Alaska Native, Asian, and Black or African American residents are disproportionately affected by poverty.

Table 2-28a: Rialto Population Living Below the Poverty Line, by Race and Ethnicity		
Race and Ethnicity	Population Percentage Living Below Poverty Line	Total Population Percentage
White Alone	16.7%	62.9%
Black or African American Alone	17.6%	13%
American Indian and Alaska Native Alone	14.4%	0.6%
Asian Alone	11.4%	2.5%
Native Hawaiian and Other Pacific Islander Alone	0%	0%
Some Other Race	14.8%	17.2%
Two or More Races	12%	3.7%
Hispanic or Latino Origin (of any race)	17.1%	74.3%
White Alone, not Hispanic Or Latino	9.4%	9.6%
Source: American Community Survey, 5-Year Estimates, 2019.		

Housing Extremely Low-Income households (those with incomes less than 30% of the County Median income) are generally challenging in Rialto. **Table 2-28b** shows that there are 3,259 persons in Rialto with incomes less than 30% of the Area Median Income. Black, Non-Hispanic Households experience the highest rates of extremely low income, representing 20% of the total Extremely Low-Income Population. This income category is generally distributed evenly amongst other racial/ethnic groups. Renters tend to have a higher incident of Extremely Low Income in Rialto.

Table 2-28b: Extremely Low-Income Household Needs

Race and Ethnicity	Total Households	Households below 30% MFI	Share below 30% MFI
White, non-Hispanic	4,080	305	7.5%
Black, non-Hispanic	4,075	815	20.0%
Asian and other, non-Hispanic	1,171	154	12.2%
Hispanic	16,285	1,985	12.2%
Total	25,611	3,259	12.7%
Renter-occupied	9,435	2,145	22.7%
Owner-occupied	16,130	1,100	6.8%
Total	25,565	3,245	12.7%

Source: Source: HUD CHAS, 2012-2016.

Key Challenges and Resources to Address Extremely Low-Income Household Housing Needs

Resources to address the needs of extremely low-income households include a variety of Federal, State, and regional programs, such as Section 8, HUD, LIHTC, CalHFA and other public and private funding sources.

To address the unique needs of Extremely Low-Income Households the City currently has 14 total affordable housing developments, as detailed in **Table 3-36** in **Section 3 of the Housing Element**. This includes 1,037 deed-restricted affordable units ranging from one- to three-bedroom units available for lower-income households.

Extremely Low-Income Households in Rialto have exhibited the following unique challenges to housing:

- Need for increased affordable housing options
- Markedly higher incidents of cost burden for housing
- Rental assistance
- Higher incidents of homelessness
- Higher likelihood for transitional and supportive Housing

Extremely Low-income household needs are focused on affordability of housing and access to subsidies and services that support lower monthly overall costs. To address these challenges, the City must consider a variety of solutions to address the above issues, including:

- Affordable housing options for Extremely Low-Income households
- Preservation of subsidized housing units
- Creation of additional subsidized housing units
- Housing with a service component
- Transitional, supportive and homeless housing options

To address unique needs of Extremely Low-Income households in the City, the following programs have been included in **Section 4**:

- **Housing Program 1A:** Acquisition, Rehabilitation, and Resale Program
- **Housing Program 1B:** Funding for Housing Rehabilitation Programs
- **Housing Program 1D:** Multi-Family Improvement Districts
- **Housing Program 1F:** Targeted Neighborhood Approach
- **Housing Program 2D:** Accessory Dwelling Unit Construction
- **Housing Program 2I:** Emergency Shelters
- **Housing Program 2J:** Transitional and Supportive Housing
- **Housing Program 2K:** Manufactured Housing
- **Housing Program 2L:** Condominium Conversion
- **Housing Program 2M:** Single-Room Occupancy (SRO)
- **Housing Program 2N:** Alternative Housing Concepts
- **Housing Program 2T:** Inclusionary Housing Ordinance
- **Housing Program 3B:** Preserve and Monitor At-Risk Units
- **Housing Program 3C:** Mobile Home Park Preservation
- **Housing Program 3F:** County Housing Voucher Program
- **Housing Program 3G:** Tenant-Based Rental Assistance
- **Housing Program 5A:** Affirmatively Furthering Fair Housing
- **Housing Program 5B:** Fair Housing Services
- **Housing Program 5D:** Emergency Shelters, Transitional and Supportive Housing
- **Housing Program 5E:** Supportive Housing / Low Barrier Navigation Centers

The City will continue to monitor the inventory of sites appropriate to accommodate extremely low-income housing, emergency shelters, transitional and supportive housing and will work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. The City is committed to prioritizing funding and other available incentives for projects that provide housing for homeless and extremely low-income residents whenever possible.

7. Persons Experiencing Homelessness

Homelessness is an important issue within California. Factors contributing to the rise in homelessness include increased unemployment and underemployment, a lack of housing affordable to lower and moderate-income persons (especially extremely low-income households), reductions in public subsidies to the poor, a lack of assistance for those struggling with addiction, and the de-institutionalization of the mentally ill.

State law mandates that jurisdictions address the special needs of persons experiencing homelessness within their jurisdictional boundaries. "Homelessness" as defined by the U.S. Department of Housing and Urban Development (HUD) was recently updated. The following lists the updated definition of homelessness:

- People who are living in a place not meant for human habitation, in emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided. The only significant change from existing practice is that people will be considered homeless if they are exiting an institution where they resided for up to 90 days (it was previously 30 days) and were in a shelter or a place not meant for human habitation immediately prior to entering that institution.
- People who are losing their primary nighttime residence, which may include a motel or hotel or a doubled-up situation, within 14 days and lack resources or support networks to remain in housing. HUD had previously allowed people who were being displaced within 7 days to be considered homeless. The proposed regulation also describes specific documentation requirements for this category.
- Families with children or unaccompanied youth who are unstably housed and likely to continue in that state. This is a new category of homelessness, and it applies to families with children or unaccompanied youth who have not had a lease or ownership interest in a housing unit in the last 60 or more days, have had two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to employment.
- People who are fleeing or attempting to flee domestic violence, have no other residence, and lack the resources or support networks to obtain other permanent housing. This category is similar to the current practice regarding people who are fleeing domestic violence.

This definition does not include persons living in substandard or overcrowded housing units, persons being discharged from mental health facilities (unless the person was homeless when entering and is considered homeless at discharge), or persons who may be at risk of homelessness (for example, living temporarily with family or friends).

Table 2-29 shows the population of persons experiencing homelessness in Rialto, in the surrounding cities, and in San Bernardino County. Rialto experienced a 38.3 percent increase in its homeless population between 2018 and 2020. All surrounding jurisdictions also saw an increase in homelessness. The City of Colton had the largest increase between 2018 and 2020. San Bernardino County had an increase of 32.2 percent.

Table 2-29: Homelessness in Rialto and Surrounding Cities

Jurisdiction	2018	2019	2020	Percent Change 2018-2020
Fontana	72	94	116	37.9%
Rialto	**71**	**133**	**115**	**38.3%**
San Bernardino	646	890	1,056	38.8%
Colton	42	58	136	69.1%
San Bernardino County	2,118	2607	3,125	32.2%

Source: American Community Survey, 5-Year Estimates, 2019.

Key Challenges and Resources to Address Persons Experiencing Homelessness

The City of Rialto partners with the County of San Bernardino to provide services and resources for persons experiencing homelessness. The County's Office of Homeless Services (OHS) coordinates an extensive network of organizations that deliver a multitude of services such as housing, life skills development, employment assistance, basic needs provision and other supportive services to either prevent homelessness or to assist people who are currently homeless. Regional resources that are available to persons experiencing homelessness in Rialto include the following:

- The Department of Behavioral Health in San Bernardino provides basic need and outreach services to persons experiencing homelessness in San Bernardino County.
- Family Services Association of Redlands provides temporary housing, food, and childcare to families facing housing instability.
- Frazee Community Center in San Bernardino provides services to low-income households and persons experiencing homelessness. The Frazee Community Center has three emergency shelters for men, one transitional shelter for male veterans, and one shelter for adults and children.
- Agape House in Fontana provides housing for single women and children who are in crisis and experiencing homelessness.
- Catholic Charities in San Bernardino provides hotel vouchers, utility bill assistance, and rent assistance.
- Salvation Army in San Bernardino provides motel vouchers for persons and families experiencing homelessness.
- Central City Lutheran Mission in San Bernardino provides housing, and cold weather shelter as well as hot meals for men experiencing homelessness.
- Mercy House in Ontario provides homeless prevention, emergency services, housing, and motel vouchers to persons experiencing homelessness.

To address unique needs of persons experiencing homelessness in the City, Rialto has included **Housing Program 2M** encouraging the development of Single-Room Occupancy units to serve as an entry point into the housing market for persons experiencing homelessness. Additionally, **Housing Program 2I, 2J** and **5E** address emergency shelter, supportive and transitional housing and low barrier navigation center needs for persons experiencing homelessness.

8. Students

Student housing is another need impacting housing demand. Student housing often produces a temporary housing need based on the duration of the educational institution enrolled in. The impact on housing demand is often increased in areas surrounding universities and colleges. According to the American Community Survey 2019 data, there are approximately 6,884 Rialto residents enrolled in college or graduate school. College graduates provide a specialized pool of skilled labor that is vital to the economy. However, a lack of affordable housing may lead to their departure post-graduation.

Key Challenges and Resources to Address Student Housing Needs

Typically, students are low-income and are, therefore, affected by a lack of affordable housing, especially within easy commuting distance from campus, therefore it is important for the City to

consider and accommodate the student population within the community. They often seek shared housing situations to decrease expenses and can be assisted through roommate referral services offered on and off campus. A lack of affordable housing also influences choices students make after graduating. The City is dedicated to providing affordable housing options for all populations in Rialto. To address the unique needs of students in the City, the following programs have been included in **Section 4**:

- **Housing Program 2D**: Accessory Dwelling Unit Construction
- **Housing Program 2L**: Condominium Conversion
- **Housing Program 2M**: Single-Room Occupancy (SRO)
- **Housing Program 2N**: Alternative Housing Concepts
- **Housing Program 3B**: Preserve and Monitor At-Risk Units
- **Housing Program 3F**: County Voucher Program
- **Housing Program 3G**: Tenant-Based Rental Assistance
- **Housing Program 5A**: Affirmatively Furthering Fair Housing
- **Housing Program 5B**: Fair Housing Services

G. Housing Stock Characteristics

Rialto's housing stock includes all housing units located within its jurisdiction. Housing stock growth, type, age and condition, tenure, vacancy rates, costs, and affordability are all important factors in determining the housing needs of the community. This section details the housing stock characteristics of Rialto to identify how well the current housing stock meets the needs of current and future residents of the City.

1. Housing Growth

Table 2-30 shows growth trends for housing units in Rialto and surrounding cities. The data shown in the table reflects ACS 5-year estimates and is not based on true City reported figures. An evaluation of the existing development and development opportunities is outlined in **Section 3: Housing Constraints, Resources, and AFFH**. The number of housing units in Rialto have increased since 2010. However, growth has been limited as compared to the neighboring cities of Colton and Fontana.

Table 2-30: Housing Unit Growth Trends

Jurisdiction	2010	2015	2019	Percent Change 2010 to 2019
Fontana	49,967	52,095	56,410	12.9%
Rialto	**26,720**	**26,642**	**27,198**	**1.8%**
San Bernardino	66,611	62,683	63,413	-4.8%
Colton	16,597	17,099	18,778	13.1%
San Bernardino County	691,321	705,962	720,757	4.3%

Source: American Community Survey, 5-Year Estimates, 2019.

2. Housing Type

Table 2-31 summarizes the available housing units in Rialto and San Bernardino County by housing type. As of 2019, single-unit detached homes made up 70.8 percent of the Rialto housing stock. Single-unit attached homes include townhomes and condominiums, which make up a small 2 percent of the housing stock. Multi-unit developments include apartments and represent less than a quarter of the City's housing

stock (20.8 percent). Lastly, approximately 6 percent of the City's housing units are mobile homes. Rialto's housing stock is similar to that of San Bernardino County.

Table 2-31: Total Housing Units by Type

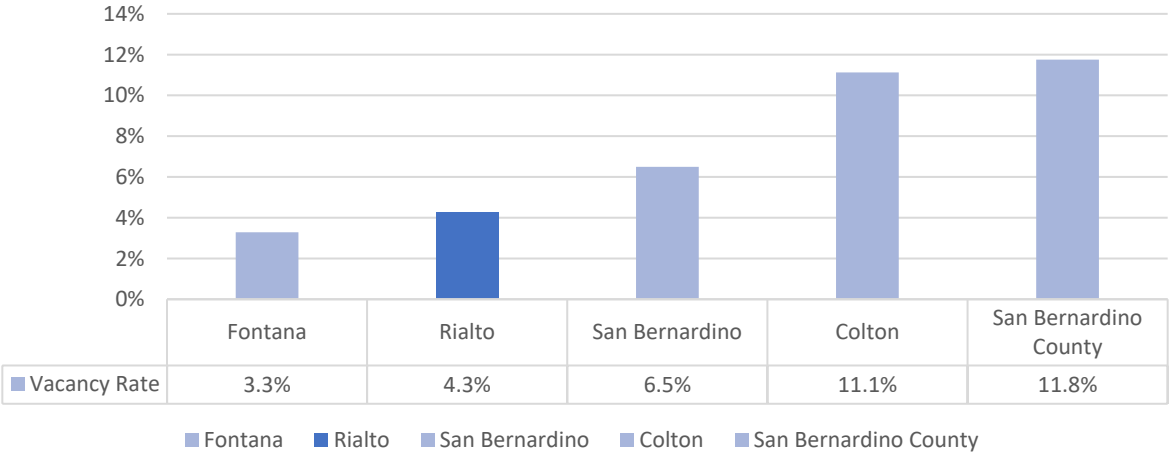
Jurisdiction	Single-Unit Detached		Single-Unit Attached		Multi-Unit		Mobile Homes		Total Units
	Count	%	Count	%	Count	%	Count	%	
Rialto	19,254	70.8%	535	2.0%	5,667	20.8%	1,729	6.4%	27,198
San Bernardino County	509,652	70.7%	28,284	3.9%	140,930	19.5%	41,032	5.7%	720,757

Source: *American Community Survey, 5-Year Estimates, 2019.*

3. Housing Availability and Tenure

Rialto has one of the lowest vacancy rates of the neighboring cities (**Figure 2-5**). At 4.3 percent, Rialto's vacancy rate is almost a quarter of San Bernardino County's. The City of Fontana has the lowest vacancy rate at 3.3 percent and about 1 percent below Rialto's. A large portion of Rialto's vacant units are vacant for unknown reasons, according to ACS data (44.9 percent). **Table 2-32** shows that 13.2 percent of Rialto's vacant units are up for rent and about 26 percent are on the market or were already sold but are not yet occupied.

Figure 2-5: Vacancy Rates by Jurisdiction



Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-32: Vacant Housing Units by Type

Type of Housing	Estimate	Percentage
For rent	154	13.2%
Rented, not occupied	75	6.4%
For sale only	211	18.1%
Sold, not occupied	96	8.2%
For seasonal, recreational, or occasional use	106	9.1%
For migrant workers	0	0.0%
Other vacant	523	44.9%
Total	1,165	100%

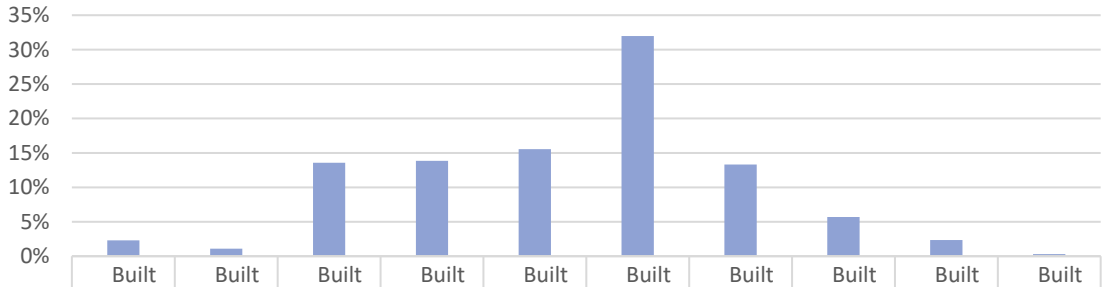
Source: *American Community Survey, 5-Year Estimates, 2019.*

4. Housing Age and Condition

Housing age may affect the structural integrity of a house and can be an indicator of overall housing quality within a community. Housing that is over 30 years old is typically in need of some major rehabilitation, such as a new roof, foundation, plumbing, etc. Many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs. A large proportion of older housing stock would typically indicate that most of the City's housing stock could require major rehabilitation. This does not include historical districts which are generally well preserved.

Figure 2-6 describes the age of Rialto's housing stock. The figure reflects ACS survey data which is based on estimates and not recorded figures. The data shows that the city experienced a housing boom between 1980 and 1989 and resulted in the construction of 32 percent of Rialto's housing stock. Most housing units were built between 1950 and 1999. Housing units that were built over 30 years ago may typically benefit from upgrades or renovations. About 21.7 percent of the City's housing stock was built in the last 30 years. Based on field observations, staff estimates that 0.6 percent of the housing stock (or approximately 163 homes) are in need of substantial rehabilitation. **Table 4-1** and **Housing Program 1A** establish a goal of assisting approximately 163 homes during the planning period.

Figure 2-6: Housing Stock Age

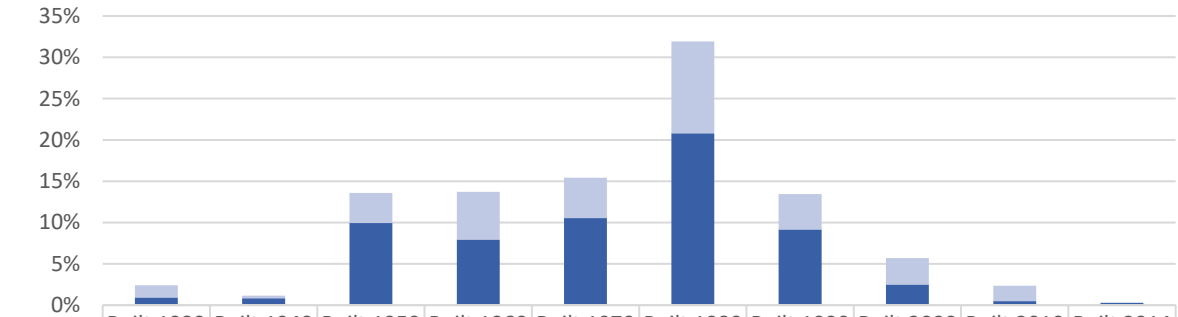


	Built 1939 or earlier	Built 1940 to 1949	Built 1950 to 1959	Built 1960 to 1969	Built 1970 to 1979	Built 1980 to 1989	Built 1990 to 1999	Built 2000 to 2009	Built 2010 to 2013	Built 2014 or later
Percentage	2.3%	1.1%	13.6%	13.8%	15.5%	32.0%	13.3%	5.7%	2.4%	0.3%

Source: American Community Survey, 5-Year Estimates, 2019.

Figure 2-7 below illustrates tenure by the year housing units were built. This shows whether homeowner or renters occupy newer or older housing units. More renters in Rialto occupy housing units built in 2000 or later than homeowners.

Figure 2-7: Tenure by Year Housing Unit Built



	Built 1939 or earlier	Built 1940 to 1949	Built 1950 to 1959	Built 1960 to 1969	Built 1970 to 1979	Built 1980 to 1989	Built 1990 to 1999	Built 2000 to 2009	Built 2010 to 2013	Built 2014 or later
Renter	1.5%	0.3%	3.6%	5.8%	4.9%	11.1%	4.3%	3.2%	1.9%	0.0%
Owner	0.9%	0.8%	9.9%	7.9%	10.5%	20.8%	9.2%	2.5%	0.5%	0.3%

Source: American Community Survey, 5-Year Estimates, 2019.

5. Housing Costs and Availability

In 2019, the median home value in Rialto was estimated to be $313,400. As **Table 2-33** shows, Rialto's median home value is approximately $14,800 less than San Bernardino County and $58,300 less than the City of Fontana. Fontana has the highest median home value.

Table 2-33: Median Home Value by Community

Jurisdiction	Median Home Value
Fontana	$371,700
San Bernardino County	$328,200
Rialto	**$313,400**
Colton	$257,500
San Bernardino	$249,400

Source: American Community Survey, 5-Year Estimates, 2019.

Table 2-34 shows monthly rent for a one bedroom in Rialto has increased from $795 per month to $869 per month between 2015 and 2019 (an increase of 9.3 percent). Housing units with 5 or more bedrooms experienced the greatest increases in cost over the 5 years with an increase of 24.6 percent. In general, all rental units increased in prices over these 5 years, with the median gross rent increasing by 15.6 percent from $1,090 to $1,260.

Table 2-34: Median Gross Rent by Bedrooms						
	2015	2016	2017	2018	2019	Percent Change 2015 - 2019
Studio	$829	$804	$856	$933	$1,008	21.6%
1 Bedroom	$795	$800	$822	$868	$869	9.3%
2 Bedrooms	$981	$1,034	$1,077	$1,115	$1,159	18.1%
3 Bedrooms	$1,348	$1,350	$1,408	$1,423	$1,481	9.9%
4 Bedrooms	$1,649	$1,707	$1,840	$1,874	$1,912	15.9%
5 or More Bedrooms	$1,625	$1,802	$1,974	$1,873	$2,025	24.6%
Median Gross Rent	$1,090	$1,110	$1,147	$1,198	$1,260	15.6%
Source: American Community Survey, 5-Year Estimates, 2015, 2016, 2017, 2018, 2019.						

Housing affordability analysis includes comparing the cost of renting or owning a home in the City with the maximum affordable housing costs for households at different income levels. The analysis informs the affordability of different housing sizes and types and indicates the type of households most likely to experience overcrowding and overpayment.

The Federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey and the Median Family Income (MFI), the California Department of Housing and Community Development (HCD) develops income limits to determine the maximum price affordable in the upper range of each income category. Households in the lower end of each category can afford less than those at the upper end. **Table 2-35** shows the maximum affordable home prices without overpayment for residents in San Bernardino County. This amount is contrasted with current housing values shown in **Table 2-33**. In **Table 2-36**, the data shows the maximum affordable monthly rental amount that a household can pay for each month without incurring a cost burden.

Extremely Low-Income

Extremely low-income households that earn less than 30 percent of the County MFI have a maximum affordable home price of $35,000 for ownership of a one-person household and $32,500 for a five-person household. Extremely low-income households cannot afford market-rate rental or ownership housing in Rialto without a substantial cost burden.

Very Low-Income

The very low-income limits are the basis for all other income limits. Very low-income households that earn between 31 percent and 50 percent of the County MFI have a maximum affordable home price of $87,000 for ownership of a one-person household and $86,500 for a five-person household. Very low-income households cannot afford market-rate rental or ownership housing in Rialto without a substantial cost burden.

Low-Income

Low-income households that earn between 51 percent and 80 percent of the County's MFI have a maximum affordable home price of $164,000 for ownership of a one-person household and $206,000 for a five-person household. Low-income households could generally afford market-rate rental units in Rialto depending on household size. Low-income households would not be able to afford ownership housing.

Moderate Income

Persons and households of moderate income earn between 81 percent and 120 percent of the County's MFI. The maximum affordable home price for a moderate-income household is $261,000 for a one-person household and $356,000 for a five-person family. Moderate income households can generally find affordable market-rate rental units in the Rialto. Ownership housing in the City is generally affordable to 5-person households but remains generally unattainable to smaller household sizes.

Table 2-35: Affordable Housing Costs in San Bernardino County (2020)

Annual Income		Mortgage	Utilities[1]	Tax and Insurance	Total Affordable Monthly Cost	Affordable Purchase Price
Extremely Low-income (30% of AMFI)						
1-Person	$23,700	$161	$192	$62	$415	$35,000
2-Person	$27,050	$140	$264	$71	$475	$30,500
3-Person	$30,450	$121	$346	$82	$549	$26,500
4-Person	$33,800	$136	$427	$99	$663	$30,000
5-Person	$36,550	$148	$512	$116	$776	$32,500
Very Low-Income (50% of AMFI)						
1-Person	$27,650	$396	$192	$104	$691	$87,000
2-Person	$31,600	$408	$264	$119	$790	$89,500
3-Person	$35,550	$409	$346	$133	$889	$90,000
4-Person	$39,500	$412	$427	$148	$988	$90,500
5-Person	$42,700	$395	$512	$160	$1,068	$86,500
Low-income (80% AMFI)						
1-Person	$44,250	$748	$192	$166	$1,106	$164,000
2-Person	$50,600	$811	$264	$190	$1,265	$178,000
3-Person	$56,900	$863	$346	$213	$1,423	$189,500
4-Person	$63,200	$916	$427	$237	$1,580	$201,000
5-Person	$68,300	$939	$512	$256	$1,708	$206,000
Moderate Income (120% AMFI)						
1-Person	$65,100	$1,191	$192	$244	$1,628	$261,000
2-Person	$74,400	$1,317	$264	$279	$1,860	$289,000
3-Person	$83,700	$1,433	$346	$314	$2,093	$314,500
4-Person	$93,000	$1,549	$427	$349	$2,325	$340,000
5-Person	$100,450	$1,623	$512	$377	$2,511	$356,000

1. Utilities includes natural gas cooking, heating, water heating; basic electric; water; trash; air conditioning; refrigerator. Utilities are calculated for detached houses only.

Source: 2020 HACSB Utility Allowance Schedule and California Department of Housing and Community Development, 2021 Income Limits and Kimley Horn and Associates Assumptions: 2021 HCD income limits; 30% gross household income as affordable housing cost; 15% of monthly affordable cost for taxes and insurance; 10% down payment; and 4.5% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on the Housing Authority of San Bernardino County Utility Allowance.

Table 2-36: Affordable Monthly Housing Cost for Renters in San Bernardino County (2020)

Annual Income		Rent	Utilities[1]	Total Affordable Monthly Housing Cost
Extremely Low-income (30% of AMFI)				
1-Person	$16,600	$247	$168	$415
2-Person	$19,000	$261	$214	$475
3-Person	$21,960	$277	$272	$549
4-Person	$26,500	$337	$326	$663
5-Person	$31,040	$394	$382	$776
Very Low-income (50% of AMFI)				
1-Person	$27,650	$523	$168	$691
2-Person	$31,600	$576	$214	$790
3-Person	$35,550	$617	$272	$889
4-Person	$39,500	$662	$326	$988
5-Person	$42,700	$686	$382	$1,068
Low-income (80% AMFI)				
1-Person	$44,250	$938	$168	$1,106
2-Person	$50,600	$1,051	$214	$1,265
3-Person	$56,900	$1,151	$272	$1,423
4-Person	$63,200	$1,254	$326	$1,580
5-Person	$68,300	$1,326	$382	$1,708
Moderate Income (120% AMFI)				
1-Person	$65,100	$1,460	$168	$1,628
2-Person	$74,400	$1,646	$214	$1,860
3-Person	$83,700	$1,821	$272	$2,093
4-Person	$93,000	$1,999	$326	$2,325
5-Person	$100,450	$2,129	$382	$2,511

1. Utilities includes natural gas cooking, heating, water heating; basic electric; water; air conditioning; refrigerator. Utilities are calculated for apartments only.

Source: 2020 HACSB Utility Allowance Schedule and California Department of Housing and Community Development, 2021 Income Limits and Kimley Horn and Associates Assumptions: 2021 HCD income limits; 30% gross household income as affordable housing cost; 15% of monthly affordable cost for taxes and insurance; 10% down payment; and 4.5% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on the Housing Authority of San Bernardino County Utility Allowance.

Section 3

Housing Constraints, Resources, and Affirmatively Furthering Fair Housing (AFFH)

Housing Constraints, Resources, and AFFH

As is common in many communities, a variety of constraints affect the provisions and opportunities for adequate housing in the City of Rialto. Housing constraints consist of governmental constraints, including but not limited to development standards and building codes, land use controls, and permitting processes; as well as, nongovernmental or market constraints including but not limited to land costs, construction costs, and availability of finances. Combined, these factors create barriers to availability and affordability of new housing, especially for lower and moderate-income households.

A. Nongovernmental Constraints

Nongovernmental constraints affect the cost of housing in Rialto and can produce barriers to housing production and affordability. These constraints include the availability and cost of land for residential development, the demand for housing, financing, and lending, construction costs, and the availability of labor. These constraints can make it expensive for developers to build any housing, particularly affordable housing. The following section highlights the primary market factors that affect the production of housing in Rialto.

1. Land Costs and Construction Costs

Construction costs vary widely according to the type of development, with multi-family housing generally less expensive to construct than single-family homes on a square-foot and per unit basis. However, there is variation within each construction type, depending on unit size and the quantity and quality of amenities provided. One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The ICC was established in 1994 with the goal of developing a single set of national model construction codes, known as the International Codes or I-Codes. The ICC updates the estimated cost of construction at six-month intervals and provides estimates for the average cost of labor and materials for typical Type VA wood-frame housing. Estimates are based on “good-quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes.

In August 2020, the ICC estimated the average per square foot cost for good-quality housing was approximately $118.57 for multi-family housing, $131.24 for single-family homes, and $148.44 for residential care/assisted living facilities. Construction costs for custom homes and units with extra amenities are higher. Construction costs are dependent upon materials used and building height, as well as regulations set by the City’s adopted Development Code, Building Code and Fire Code. For example, according to the ICC, an accessory dwelling unit (ADU) or converting a garage space for residential use using a Type VB wood framed unit would cost about $123.68 per square foot. Although construction costs are a significant portion of the overall development cost, they are consistent throughout the region and, when considering land costs, are not considered a major constraint to housing production in Rialto.

Land costs can also pose a significant constraint to the development of affordable and middle-income housing and represents a significant cost component in residential development. Land costs may vary depending on whether the site is undeveloped or has an existing use that must be removed. Similarly,

environmental issues (e.g. soil stability, seismic hazards, flooding) can also be considered constraints because they increase the overall cost of land. A May 2021 web search for an undeveloped lot for sale in Rialto returned nine lots for sale ranging in size and cost from 0.17 acre listed at $185,000 to 5.02 acres listed at $3,500,000. Based on information available for these nine lots, the average cost of land in Rialto is $12.74 per square foot. The cost of land in the City is considered affordable, accessible, and not considered a barrier or constraint to the potential development of housing.

2. Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. The availability of financing depends on a number of factors, including the type of lending institutions active in a community, lending practices, rates and fees charged, laws and regulations governing financial institutions, and equal access to such loans. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. Lending activity is reviewed to determine if home financing is made available to all residents of a community. Data related to the disposition of loan applications submitted to financial institutions for home purchase, home improvement, and refinancing in the Riverside-San Bernardino-Ontario MSA/MD are discussed below.

Table 3-1 shows the disposition of loan applications for the Riverside-San Bernardino-Ontario MSA/MD per the 2019 HMDA report.

Table 3-1: Disposition of Loan Applications by Race/Ethnicity – RIVERSIDE-SAN BERNARDINO-ONTARIO MSA/MD				
Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN				
American Indian and Alaska Native	27.9%	36.4%	37.6%	258
Asian	39.0%	35.4%	27.7%	983
Black or African American	48.9%	22.5%	29.8%	1,295
Native Hawaiian or other Pacific Islander	26.8%	50.3%	24.2%	149
White	48.0%	25.4%	29.2%	12,112
Hispanic or Latino	44.1%	28.5%	29.7%	6,251
50-79% OF MSA/MD MEDIAN				
American Indian and Alaska Native	40.9%	36.4%	26.1%	352
Asian	47.0%	30.3%	27.2%	1,521
Black or African American	43.8%	27.9%	32.3%	1,529
Native Hawaiian or other Pacific Islander	34.7%	48.2%	20.2%	193
White	54.0%	21.7%	29.9%	19,017
Hispanic or Latino	51.5%	25.0%	28.2%	11,797
80-99% OF MSA/MD MEDIAN				
American Indian and Alaska Native	44.4%	29.9%	28.5%	144
Asian	50.2%	22.8%	31.7%	880
Black or African American	46.1%	24.7%	32.4%	777
Native Hawaiian or other Pacific Islander	56.9%	27.7%	20.0%	65
White	57.7%	17.9%	29.4%	9,073
Hispanic or Latino	56.0%	19.5%	28.9%	5,678
100-119% OF MSA/MD MEDIAN				
American Indian and Alaska Native	48.1%	23.9%	30.9%	401
Asian	59.2%	18.7%	27.9%	2,831
Black or African American	53.0%	21.0%	29.5%	2,347
Native Hawaiian or other Pacific Islander	45.2%	32.4%	24.3%	259
White	63.1%	14.6%	27.3%	27,396
Hispanic or Latino	60.8%	16.4%	27.0%	16,178
120% OR MORE OF MSA/MD MEDIAN				
American Indian and Alaska Native	51.5%	19.2%	32.8%	927
Asian	60.6%	15.9%	28.9%	12,219
Black or African American	55.0%	18.7%	29.9%	6,393
Native Hawaiian or other Pacific Islander	51.1%	23.1%	30.6%	620
White	65.5%	12.4%	27.9%	78,875
Hispanic or Latino	61.5%	15.5%	27.3%	30,093
Source: Consumer Financial Protection Bureau, Disposition of loan applications, by Ethnicity/Race of applicant, 2019.				

3. Economic Constraints

Market forces on the economy and the trickle-down effects on the construction industry can act as a barrier to housing construction, particularly to affordable housing construction. It is estimated that housing price growth will continue in the City and the region for the foreseeable future. Moving into 2020, the economy was growing. California saw 1.6-percent growth in jobs versus 2019 and experienced all-time low unemployment rates.

The COVID-19 pandemic stalled many sectors of the economy in early 2020; however, as the California economy regains momentum, the housing stock and prices in the Rialto community remain stable. A housing market analysis by Redfin in May 2021 reports the median sale price of homes is $455,000, a 17.6-percent increase over 2020. In addition, Redfin reports homes spend an average of 14 days on the market and are selling at 3.8-percent over the listing price. The price per square foot is currently reported to be $295 – having increased 26.3 percent since last year.

According to the California Association of Realtors (CAR), the average cost of homes for sale in San Bernardino County is $405,000 (April 2021), a year-to-year increase of 24.6 percent. The average home cost in San Bernardino County is $345,000 less than Southern California ($750,000) and $95,000 less than that of the Inland Empire ($500,000).

According to the CAR First Time Buyer Housing Affordability Index for the first quarter of 2021, the median value of homes in San Bernardino County was $339,150, Monthly mortgage payments associated with this purchase price is $1,650 (including taxes and insurance). An average qualifying income of $49,500 is necessary to afford the median home price.

To locally assist with financial and economic constraints for residential developments, and specifically affordable housing developments, **Section 4: Housing Plan** of this Housing Element includes Housing Goal #3: Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing. Housing Goal #3 includes the following housing programs:

- **Housing Program 3A**: Down Payment Assistance Program
- **Housing Program 3B**: Preserve and Monitor At-Risk Units
- **Housing Program 3C**: Mobile Home Park Preservation
- **Housing Program 3D**: County Homeownership Program
- **Housing Program 3E**: Good Neighbor Next Door Program
- **Housing Program 3F**: County Housing Voucher Program
- **Housing Program 3G**: Tenant-Based Rental Assistance

Section 4: Housing Plan also includes a number of additional programs which seek to decrease the overall cost of constructing housing and incentivize the development of housing and affordable housing through the reduction of fees and development standards.

B. Governmental Constraints

Policies and regulations affect the price and availability of housing and the provision of affordable housing. For example, State and Federal regulations affect the availability of land for housing and the cost of housing production, making it difficult to meet the demand for affordable housing and limiting supply in a region. Regulations related to environmental protection, building codes, and other topics have significant, and at times adverse, impacts on housing cost and availability.

While the City of Rialto has no control over State and Federal Laws that bear upon housing, local laws including land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can constrain the maintenance, development, and improvement of housing by creating barriers.

1. Land Use Controls

Cities in California are required by Law to prepare a comprehensive, long term General Plan to guide future development. The Land Use Element of the General Plan establishes permitted land uses and development density. The following lists the land use designations which permit for a variety of residential uses throughout the city and their provided General Plan descriptions:

- **R2 – Residential** (0 – 2 dwelling units per acre): Reserved for very-low-density residential development. Generally single, detached homes on large lots, with a density of no more than 2 units acre. Additional permitted uses include group homes, public facilities, and utility support systems. Population density: 0 – 8 persons per acre.
- **R6 – Residential** (2.1 – 6 dwelling units per acre): Allows for residential development at low densities. Includes developments consisting of detached units in suburban-style subdivisions, with one unit per lot. Additional permitted uses include group homes, public facilities, and utility support systems. Population density: 8 – 23 persons per acre.
- **R12 – Residential** (6.1 – 12 dwelling units per acre): Allows residential development at moderate densities. Developments may include detached single units on individual lots, low-scale attached units with private and/or shared open space, groups of attached housing with larger common open space areas, and mobile home parks. Parking for individual units may be attached to and have direct access to interior living spaces. Additional permitted uses include group homes, public facilities, and utility support systems. Population density: 23 – 46 persons per acre.
- **R21 – Residential** (12.1 – 21 dwelling units per acre): Allows for residential development at higher densities, with locations typically located along major streets and near major activity centers. Development approaches may include low-scale attached units with private and/or shared open space, and groups of attached housing with larger common open space areas. Parking for individual units may either be fully enclosed with direct access to the dwelling units or common covered parking areas. Additional permitted uses include group homes, community care facilities, public facilities, and utility support systems. Population density: 46 – 80 persons per acre.
- **R30 – Residential** (22.1 – 30 dwelling units per acre): Creates opportunities for higher-density, multi-story residential developments with either surface or structured parking. Locations occur

along or near major transportation corridors and within walking distance of commercial centers and transit services. Amenities shall include common recreation and/or assembly areas suited to the population served. Additional permitted uses include public facilities and utility support systems. Population density: 80 – 114 persons per acre. **DMU – Downtown Mixed Use** (6.1 – 60 dwelling units per acre): The designation applies to Rialto's historic downtown core. This designation is established to facilitate development of a complementary mix of retail and service commercial, dining, entertainment, and residential uses within walking distance of each other and the nearby Metrolink station and Civic Center. Residential uses within the Downtown district may be developed as a stand-alone structure or as part of mixed-use development. However, any mixed-use structures with both commercial and residential use that front Riverside Avenue must have a ground-floor use that enlivens the environment and invites pedestrian access, such as retail or dining. Population density: 23 – 229 persons per acre.

State Density Bonus Law

In accordance with State Law – Government Code Section 65915 – a housing development may propose to increase the number of units above the maximum permitted and/or receive concessions or incentives that result in reductions in development standards in exchange for reserving units for very low-, low-income, and/or moderate-income households or for seniors. These units must be restricted by agreement to their level of affordability for at least 55 years. Density Bonuses may be requested for development that consist of 5 or more dwelling units. The Planning Commission or City Council may grant one density bonus to proposed housing developments that include at least one of the following:

- 10% of the total units of a housing development for lower income households;
- 4% of the total units of a housing development for very low income households;
- 10% of the total units in a common interest development for moderate income households (provided all units are offered to the public for purchase);
- A senior citizen housing development;
- 10% of the total units of a housing development for transitional foster youth (provided at the same affordability level as very low-income units);
- 10% of the total units of a housing development for disabled veterans (provided at the same affordability level as very low-income units);
- 10% of the total units of a housing development for homeless persons (provided at the same affordability level as very low-income units);
- 20% of the total student housing units for lower income students in a student housing development that meets the requirements of California Government Code Section 65915(b)(1)(F);
- 100% of the total units, exclusive of a manager's unit(s), for lower income households, except that up to 20% of the total units the development may be for moderate-income households.

The following density bonus calculations in **Table 3-2** through **3-4** will be applied to housing developments that meet the above criteria:

Table 3-2: Low-Income Density Bonus Calculations	
Percentage Low Income Units	Percentage Density Bonus
10	20
11	21.5
12	23
13	24.5
14	26
15	27.5
17	30.5
18	32
19	33.5
20	35
Source: City of Rialto Zoning Code	

Table 3-3: Very Low-Income Density Bonus Calculations	
Percentage Very Low-Income Units	Percentage Density Bonus
5	20
6	22.5
7	25
8	27.5
9	30
10	32.5
11	35
Source: City of Rialto Zoning Code	

Table 3-4: Moderate-Income Density Bonus Calculations	
Percentage Moderate-Income Units	Percentage Density Bonus
10	5
11	6
12	7
13	8
14	9
15	10
16	11
17	12
18	13
19	14
20	15
21	16
22	17
23	18
24	19
25	20
26	21
27	22
28	23
29	24
30	25
31	26
32	27
33	28
34	29
35	30
36	31
37	32
38	33
39	34
40	35
Source: City of Rialto Zoning Code	

Until 2021, under Government Code Section 65915, known as the Density Bonus Law, the maximum bonus was 35%. California state law AB 2345 states that all jurisdictions in California are required to process projects proposing up to 50% additional density as long as those projects provide the additional Below Market Rate units (BMR) in the "base" portion of the project, unless the locality already allows a bonus above 35%. The bill also lowered the BMR thresholds for concessions and incentives for projects with low income BPRs. As of 2021, Government Code Section 65915 authorizes an applicant to receive 2 incentives or concessions for projects that include at least 17% of the total units for lower income households, at least 10% of the total units for very low-income households, or at least 20% for persons or families of moderate income in a common interest development. It also allows an applicant to receive 3 incentives or concessions for projects that include at least 24% of the total units for lower income households, at least 15% of the total units for very low-income households, or at least 30% for persons or families of moderate income in a common interest development.

The City's Density Bonus program allows a maximum of 35% density increase; however, AB 2345 requires an allowance of up to 50% density bonus when the base BMR is proposed. The City has included a program in **Section 4: Housing Plan** to update the City's Development Code in compliance with state legislation.

2. Residential Development Standards

The City of Rialto's Zoning Code establishes residential zoning districts that permit a variety of developments and land uses in accordance with the General Plan. **Table 3-5** provides the development standards established for each zoning district to guide appropriate development. The development standards include minimum lot size requirements, building setbacks, and lot coverage.

- A-1: Agricultural Zone
- R-1: Single-Family Zones
    - R-1 A-10,000: Single-Family Zone
    - R-1 B: Single-Family Zone
    - R-1 C: Single-Family Zone
    - R-1 D: Single-Family Residential Zone
- R-3: Multiple Family Zone
- R-4: High Density Multiple Family Zone

Table 3-5: Rialto Development Standards - Dimensions								
Zone	Minimum Dimensions		Minimum Yard Setbacks			Construction Standards		
	Lot Size	Lot Width	Front	Side	Rear	Max. Height	Max. Lot Coverage	Max. Density
A-1	1 acre	120 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	N/A	N/A
R-1	8,400 sq. ft.	80 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 A-10,000	10,000 sq. ft.	100 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 B	8,400 sq. ft.	80 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 C	7,700 sq. ft.	70 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 D	10 acres	60/65 ft.	20 ft.	10 ft.	20 ft.	35 ft.	50%	6 DU/acre
R-3	1 acre	150 ft.	15 ft.	5 ft.	15 ft.	35 ft.	35%	1 DU/2,000 sq. ft.
R-4	7,200 sq. ft.	60 ft.	15 ft.	3-5 ft.	15 ft.	75 ft.	60%	1 DU/900 sq. ft.
Note: Table only reflects requirements for Zoning Districts which permit residential development. *Source: City of Rialto Zoning Code*								

The City of Rialto's development standards, as outlined in **Table 3-5**, are comparable to the standards of neighboring cities – Fontana, Colton, and San Bernardino. Rialto has some of the least restrictive development standards for the High-Density Multiple Family (R-4) Zone compared to the other cities. As Rialto's development standards do not restrict, deny, or reduce opportunities for development at a greater extent than jurisdictions in the region, they are not considered a constraint to the development of housing. Furthermore, the City provides opportunities for reasonable accommodations and Density Bonuses which may assist in the development of affordable housing.

Lot Dimensions

The City of Rialto regulates lot dimensions in conjunction with various development standards to maintain density and structural bulk. All zoning districts in the City are allocated differing lot size and lot width requirements to develop residential uses. Minimum lot size requirements could constrain housing development by requiring lot sizes that may not be available to develop projects intended for each zoning district. However, as it relates to the lot size requirements for the R-3 zone, the City has only identified very few lots zoned R-3 as part of the candidate sites analysis. These lots have a buildable acreage of 2.36 and 1 acre; minimum lot size requirements will not constrain each site from developing their combined potential of 117 units. For all R-3 zone lot size and lot coverage standards, there may pose a constraint due to the application of these standards in combination with other zoning requirements. The cumulative effect could pose a constraint to residential development in the R-3 zone. Therefore, **Program 4B** in the Housing Plan includes actions to review and amend the lot size requirements, parking and other application standards for sites in the R-3 zone.

Yard Requirements

A yard is defined by the City of Rialto Zoning Code as open space on the same lot with a building, which remains unoccupied and unobstructed from the ground up unless otherwise provided in the Zoning Code. Yard setbacks are regulated for safety and emergency access, privacy, and for environmental protection. Yard setbacks also create neighborhood uniformity and prevent crowding between structures and public-right-of-way. Rialto's yard requirements, when combined with all the development standards, do not constrain residential developments from reaching their density limits. Therefore, yard requirements alone

are not considered a constraint to housing development cost or supply. Yard requirements are required to provide safety and emergency access, privacy, and environmental protection.

Lot Coverage/Open Space

Lot coverage refers to the portion of a lot on which a building or structure is located. Lot coverage is regulated to avoid nuisances and excessive massing or density. Lot coverage differs for each zoning district and may work with open space requirements to ensure adequate uncovered area for safety and emergency access, landscaping, and privacy. Rialto's lot coverage limits, when combined with all the development standards, do not constrain residential developments from reaching their density limits. However, following feedback, the Housing Plan includes actions in **Program 4B** to review and amend the lot coverage requirements for sites in the R-3 zone.

Maximum Building Heights

Building height is defined as the vertical distance from the average finished ground level of the site covered by the building to the highest point of the structure. The highest point of the structure excludes chimneys and ventilators. Rialto's building height limits, when combined with all the development standards, do not constrain residential developments from reaching their density limits. A proposed 3-story residential development on a 1-acre lot in an R-3 zone could develop up to 37 units measuring 1,000 square feet each; however, it would be limited to 21 units on a lot of this size. A proposed 8-story residential development on a 7,200-square-foot lot in an R-4 zone could develop up to 20 units measuring 1,000 square feet each; however, it would be limited to 8 units on a lot of this size. Therefore, building height limits alone are not considered a constraint to housing development cost or supply.

Density Limits

The Rialto Zoning Code establishes a number of zoning districts with density limits so as to regulate and restrict the bulk of structures and density of population. **Table 3-5** provides the maximum densities permitted per zoning district.

Recent residential projects approved by the City have included proposed densities which are lower than the maximum density permitted. The following lists example sites and their densities:

- APN 013026115 – 10 units permitted by the Zoning Code, 4 units developed
- APN 024316137 – 6 units permitted by the Zoning Code, 4 units developed
- APN 24316138 – 6 units permitted by the Zoning Code, 4 units developed

Residential projects developing at densities lower than the maximum permitted is a relatively common occurrence due to the impact development standards, landscaping requirements, and street/sidewalk improvements have on the net buildable area of the sites after infrastructure is designed. While the City's development standards have been evaluated and when combined still allow projects to develop at the maximum density allowed, when paired with the site requirements of other City Departments, constraints may exist. As such, **Housing Program 4E** provides for a review of site requirements (as required by the Building and Engineering Divisions) to assess how the City can allow for projects to develop at their maximum density.

Population Density

The Land Use Element of the Rialto General Plan identifies population density ranges such as 80 to 114 persons per acre in the R30 land use. These ranges are simply a reference point in the General Plan and are not used on a project-by-project basis. No population density caps are used.

Parking Standards

Sufficient off-street parking must be provided to avoid street overcrowding. This is maintained through the establishment of parking requirements, which fluctuate depending on the land use/housing type and the number of bedrooms.

The City of Rialto requires the following number of parking spaces per residential use:

- **Single-Family Residential**: Two parking spaces within an enclosed garage.
- **Multiple-Family Residential**: Minimum of two parking spaces per dwelling unit with at least one located within an enclosed garage. The enclosed parking space may be substituted by a carport. At least one guest parking space must be provided for every four dwelling units.
- **Senior Citizen Housing**: Minimum of 0.75 parking spaces per dwelling unit, plus one guest parking space. At least half of the required parking spaces, with the exception of guest parking, must be in a covered carport or enclosed garage.
- **Mobile Homes**: Two parking spaces per mobile home, plus one guest space for every five mobile homes.
- **Boarding Facilities (boarding house, club, lodge, group care facility, or similar facility providing sleeping accommodations)**: One space for every room, or for every two beds, whichever is greater. An additional space must be provided per two employees, or a minimum of five spaces for employee parking, whichever is greater.

The City's parking requirements fluctuate depending on land use and intensity. The minimum parking requirements for a 48-unit project on one acre, in the R-4 zoning district, is a total of 108 parking spaces. Assuming a standard 9-foot by 18-foot parking spaces, approximately 17,496 square feet of land is needed to accommodate the required parking. Based on the market analysis provided in the governmental constraints section, land costs for an uncovered parking lot associated with a one-acre development, at maximum density, is $222,899. Construction costs for covered parking, parking structures, and/or below ground parking will run even higher. The cost of parking based on the City's requirements for multifamily housing could be considered a constraint to the development of housing; however, the developers may receive concessions or incentives in the form of parking reduction for the development of housing affordable to low and very low-income households. For example, the City recently approved a 204-unit development with 377 parking spaces when the Code required 459 parking spaces. **Housing Program 4B** is included in **Section 4: Housing Plan** to annually review development standards and design review findings for potential constraints – including potential constraints due to parking requirements. The Program provides for the update of standards and findings should a constraint be identified as part of the annual review.

Table 3-6 shows off-street parking requirements for communities neighboring Rialto. The table shows that the City of Rialto's parking requirements for single-family units matches that of the region. Parking requirements for multi-family residential projects in Rialto require more parking, depending on the number of bedrooms per unit, compared to City of Fontana and San Bernardino. However, City of Colton

requires more parking spaces than Rialto. Rialto's senior housing parking requirements are similar to that of the region.

Table 3-6: Comparative Off-Street Parking Requirements of Surrounding Cities		
Residential Use		Parking Requirements
City of Fontana		
Single-Family Dwelling	Up to 4 bedrooms	2-car garage
	5-6 bedrooms	3-car garage
Multiple-Family Apartments, Condos, or Townhouse	Studio/1 bedroom	1 garage space + 0.5 open spaces
	2 bedrooms	2 garage spaces
	3 bedrooms	2 garage spaces + 0.5 open spaces
Detached Condo	2-3 bedrooms	2 garage spaces + 0.5 open spaces
	4 bedrooms	2 garage spaces + 0.7 open spaces
Senior Housing	Studio/Efficiency	1 parking space
	1 bedroom	1 parking space
	2 or more bedrooms	1.25 parking spaces
Other Parking Requirements	Mobile home park	2 covered spaces
	Boardinghouse, group care	1 parking space per sleeping room or 2 beds, whichever is greater + 1 parking space per 2 employees
Guest Parking	Multi-Family (apartments, condos, and townhouses)	1 parking space per 3 units
	Detached condos	0.5 open spaces
	Senior housing	1 parking spaces per 8 units (0.125 per unit)
	Mobile home parks	1 parking spaces per 3 units
City of San Bernardino		
Single-Family Dwellings		2 covered spaces within an enclosed garage
Multi-Family Residential	Studio	1 space per unit
	One Bedroom	1.5 covered and 1 uncovered guest space/5 units
	Two Bedroom	2 covered and 1 uncovered guest space/5 units
	Three+ Bedroom	2.5 covered and 1 uncovered guest space/5 units
Mobile home parks		2 covered spaces within an enclosed garage, which may be tandem, and 1 uncovered quest space/unit
Planned residential developments, including single-family dwellings and condominiums		2 covered spaces within an enclosed garage and 1 uncovered off-street guest parking space/5 units
Senior citizen apartments		1 covered space for each unit, plus 1 uncovered space/5 units for guest parking
Senior congregate care		0.75 covered space for each unit
City of Colton		
Very-low to medium density residential		2 spaces in a garage per unit
Multi-family residential		2 spaces in a garage per unit 0.5 spaces per unit where there are 6+ units
Boarding, lodging, or rooming houses		1 space per room or suite, or 1 space per 2 beds
Live/work units		1 space in a garage per unit 10+ units: 2 spaces per unit + 2 guest parking spaces per unit
Sources: City of Fontana Municipal Code, City of San Bernardino Municipal Code, City of Colton Municipal Code		

Overall, the City of Rialto's off-street parking requirements may be considered a constraint to development if the cost of developing parking spaces is associated with particular bedroom sizes. To address the potential constraint, the City has added **Housing Program 4B:** Remove Development Constraints and **Housing Program 3H:** Parking Near Public Transit. **Housing Program 4B** commits the City to conduct a study of parking requirements and identify needed revisions to ensure parking requirements do not constrain development, particularly for studio and one-bedroom units. **Housing Program 3H** commits the City to amend the Zoning Code to comply with the requirements established by AB 2097.

In September 2022, AB 2097 was signed into law establishing provisions for vehicle parking requirements based on proximity to public transit. Specifically, AB 2097 prohibits public agencies from imposing minimum vehicle parking requirements for developments located within half-a-mile of public transit. "Public transit" means a major transit stop as defined by Section 21155 of the Public Resources Code:

- An existing rail of bus rapid transit station,
- A ferry terminal served by either a bus or rail transit service, and
- The intersection of two or more bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute period.

Jurisdictions may impose or enforce minimum parking requirements on housing developments if findings are made (within 30 days of a completed application) that not imposing minimum parking requirements on the development would have substantially negative impacts on the jurisdiction's ability to meet its RHNA or existing residential or commercial parking within half-a-mile of the housing development. These findings must be supported by a preponderance of the evidence in the record. Pursuant to AB 2097, the projects listed below are exempt from imposed or enforced minimum parking requirements:

- Housing development projects that dedicate a minimum of 20 percent of the total number of housing units to very low-, low-, or moderate-income households; students; the elderly; or persons with disabilities.
- Housing developments with fewer than 20 housing units.
- Housing developments subject to parking reductions based on any other applicable law.

AB 2097 prohibits these provisions from reducing, eliminating, or precluding the enforcement of any requirement imposed on a housing development project that is located within half-a-mile of public transit to provide electric vehicle supply equipment installed parking spaces or parking spaces that are accessible to persons with disabilities.

Assembly Bill 139

California Assembly Bill 139 (AB 139) amended Government Code Section 65583 on September 6, 2019. The purpose and intent of AB 139 is to plan for the needs of those experiencing homelessness by basing the needs of emergency shelters on the most recent homeless point-in-time count. The adopted amendment includes a provision for emergency shelter parking standards to accommodate staff; however, the parking standards may not exceed the standards for residential and commercial uses in the same zone.

According to the Rialto Zoning Code, service providers are responsible for providing and maintaining adequate parking and freight loading facilities for employees, clients, and other visitors who drive onto the premises. The Code establishes the following parking standard for emergency shelters:

- **Emergency Shelters**: one space per 1,000 square feet of gross floor area, or one space for each employee on the largest shift plus one space for each facility vehicle plus three visitors parking spaces, whichever is greater. Bike rack parking must also be provided at the facility.

3. Planned Residential Developments

Planned Residential Developments generally allow for greater flexibility when developing large areas of land. The Rialto Zoning Code has established two planned residential development districts for attached (PRD-A) or detached (PRD-D) housing units.

Planned Residential Development-Attached District (PRD-A)

The City's Zoning Code establishes a PRD-A District to facilitate and guide the development of high-density residential developments, including but not limited to condominiums, community apartment projects, and cluster housing. All current sites zoned PRD-A have been developed with residential units and meet the development standards shown below. The following development standards apply to proposed attached planned residential developments:

Table 3-7: PRD-A Development Standards

Development Feature		Measurement Requirement
Minimum Site Area		1 acre
Maximum Density		12 DUs/acre
Minimum Floor Area	Bachelor/Single	650 sq. ft.
	One Bedroom	750 sq. ft.
	Two Bedrooms	900 sq. ft.
	Three Bedrooms	1,100 sq. ft.
	Four Bedrooms	1,300 sq. ft.
Maximum Site Coverage		35%
Maximum Building Height		35 ft.
Minimum Setbacks	Front Yard	25 ft.
	Side Yards	15 ft.
	Rear Yard	15 ft.
Minimum Open Space		40%
Source: City of Rialto Zoning Code		

Planned Residential Development-Detached District (PRD-D)

The City's Zoning Code establishes a PRD-D District to facilitate and guide the development of single-family residential developments, including but not limited to cluster housing. All current sites zoned PRD-D have been developed with residential units and meet the development standards shown below. The following development standards apply to proposed detached planned residential developments:

Table 3-8: PRD-D Development Standards		
Development Feature		**Measurement Requirement**
Minimum Site Area		5 acres
Maximum Density		Net density of the adopted Community General Plan
Minimum Dwelling Sizes		Proposed by the applicant and approved by the Planning Commission at the time of application for a change of zone.
Maximum Site Coverage		35%
Maximum Building Height		35 ft.
Minimum Setbacks	Front Yard	25 ft.
	Side Yards	10 ft.
	Rear Yard	20 ft.
Minimum Open Space		40%
Source: City of Rialto Zoning Code		

4. City Ordinances

Growth Management Measures

Growth management measures are techniques used by a government to regulate the rate, amount, and type of development. Growth management measures allow cities to grow responsibly and orderly; however, they can produce constraints to the development of housing if overly restrictive. This may be particularly restrictive for accessible and affordable housing. There are not currently any growth management measures in Rialto; therefore, it does not create a constraint to the development of housing.

Mobile Home Rent Review Commission

The City of Rialto's Mobile Home Rent Review Commission was established to:

- Protects current homeowners' investment in their mobile homes and provides reasonable rents by precluding park owners from requiring existing or prospective mobile homeowners to sign an exempt lease or charging rents under an expired lease;
- Protects existing and prospective mobile homeowners from excessive rents by providing for lease options in order to give each existing and prospective homeowner a real choice between an exempt long-term lease and a rental agreement subject to the protections of the ordinance; and
- Protects existing and prospective homeowners' investments in their mobile homes through a lease assumption requirement imposed upon the mobile home.

The Mobile Home Rent Review Commission consists of five regular members appointed by the City Council to serve for four years. Members must be homeowners and cannot be a mobile home park owner or a relative, employee, or agent of a mobile home park owner.

According to the City's Zoning Code, rent increases and notices must comply with the following provisions:

- A park owner shall not demand, accept, or retain rent for a mobile home space exceeding the rent in effect on the effective date of this chapter, except as provided in this chapter.

- No rent increase is valid, enforceable, or collectible until either (a) an agreement has been reached after informal negotiations between a resident and a park owner or between the homeowner's association and a park owner, (b) an agreement has been reached after mediation is concluded, or (c) a final decision has been issued after the full commission hearing process is concluded.

In order to implement a rent increase, the mobile home park owner must do all of the following:

- At least thirty days prior to the service of a notice of a proposed rent increase, as required by Civil Code Section 798.30, the park owner may provide written notice to the affected recognized association (see Section 4.01.030C) with the city clerk and to the city clerk that a notice of proposed rent increase will be served. In the event that the mobile home park owner is unable to effect proper service upon the recognized association, the mobile home park owner shall post the notice in a conspicuous place in the affected mobile home park.
- Prior to the effective date of any proposed rent increase, the mobile home park owner shall serve each affected homeowner, in accordance with California Civil Code, Section 798.30, and in addition, with notice that a request for approval of the proposed rent increase is being filed with the commission.
- The mobile home park owner shall file a copy of any notice served pursuant to subsection (B)(2) of this section with the commission by delivery to the city clerk no later than five days after service upon the homeowners.
- No more than one increase in space rent shall be allowed in any twelve-month period.

The Mobile Home Rent Review Commission was established to protect existing mobile home park residents and affordable housing options within the City of Rialto. The Commission and review processes do not pose a constraint as they protect residents from displacement and housing cost burdens.

Short-Term Rental Ordinance

Short-term rentals are commonly defined as an accessory use of a Primary Residence for the purposes of providing temporary lodging for compensation for up to 30 days or less. The purpose of Short-Term Rental Ordinances is to establish regulations, standards, and a permitting process governing the renting or leasing of privately owned, visitor-serving dwelling units on a short-term basis. Short-Term Rental Ordinances are often established to safeguard residents by ensuring that short-term rental activities do not threaten the character of neighborhoods and that such short-term rental activities do not become a nuisance, or threaten the public health, safety, or welfare of neighboring properties.

The City of Rialto does not have a Short-Term Rental Ordinance.

Inclusionary Ordinance

Inclusionary Housing Ordinances are local zoning ordinances which either mandate or encourage housing developers to include a specified percentage of units affordable to lower and moderate-income households. Inclusionary Housing Ordinances bring affordable housing to market and increases types of housing available to different income levels.

The City of Rialto does not have an Inclusionary Housing Ordinance, but the City has committed to investigating the feasibility of adopting and Inclusionary Housing Ordinance during the 6th Cycle planning period (Housing Program 2T).

5. Specific Plans

The purpose of a Specific Plan is to implement the goals and objectives of a city's General Plan in a more focused and detailed manner that is area and project specific. The Specific Plan promotes consistence and an enhanced aesthetic level throughout the project community. Specific Plans contain their own development standards and requirements that may be more restrictive than those defined for the city as a whole. The following sections provide brief descriptions of the City of Rialto's adopted Specific Plans which affect the development of housing.

Agua Mansa Specific Plan

The Agua Mansa Specific Plan was established to create a master economic development plan with the goal of improving intergovernmental coordination and to facilitate the logical, planned development of the 4,285-acre area. Residential uses comprise 119 acres (less than 3 percent). The predominant land use of the Specific Plan is industrial. The Agua Mansa Specific Plan permits a maximum of 4 dwelling units per acre.

Foothill Boulevard Specific Plan

The Foothill Boulevard Specific Plan is intended to result in quality new development to encourage revitalization of existing development. The Specific Plan permits two residential land use districts – Residential-Mixed Use (R-MU) and Residential-High Density (R-HD). Both of these residential districts, and two additional commercial districts, allow for intense development to provide opportunity for innovative, high-quality development. Each of these districts has a pedestrian focus and allows for some degree of residential development. In commercial districts, residential uses must be combined with commercial uses.

The Foothill Boulevard Specific Plan allows for multi-story developments up to 75-feet in height and up to 30 dwelling units per acre on lots measuring a minimum of three acres. The Foothill Boulevard Specific Plan encourages lot consolidation and redevelopment of under-performing properties. Lower densities of residential developments may be permitted on small parcel sizes.

The City adopted the Foothill Central Specific Plan (Specific Plan) on February 11, 2025. The Specific Plan is an amendment to both the Foothill Boulevard Specific Plan and the Rialto Central Area Specific Plan. The recently adopted Specific Plan merges both planning areas to encourage a cohesive development pattern and create synergy in the corridor. The purpose of the updated Specific Plan is to guide the development of Foothill Boulevard and Rialto's Downtown Area, include pro-housing legislation aimed at supporting more equitable growth and housing production around transit corridors, and also reduce greenhouse gas (GHG) emissions and vehicles miles traveled (VMT). The Specific Plan is a tool to create quality new development that will in turn encourage the revitalization of existing development, creating a positive change in these areas and the City as a whole.

The Housing Element designates the two portions of the Plan Area, Foothill Boulevard and the Central Area, as Opportunity Areas and specifically notes the abundant vacant parcels in these areas as having high potential for revitalization with residential development. In total, the Foothill Boulevard Opportunity Area includes 159 acres as feasible for redevelopment with 5,530 units. These unit numbers assume a zoning amendment to allow 35 dwelling units per acre, an increase from the currently allowed 30 dwelling units per acre on lots of at least three acres. The Central Opportunity Area identifies 14 acres in the area as feasible for redevelopment with 470 units. This Opportunity Area's unit numbers assume the establishment of an overlay district or similar policy permitting 48 dwelling units per acre. This rezone strategy is intended to accommodate housing needs in Rialto's Opportunity Areas.

Lytle Creek Ranch Specific Plan

The Lytle Creek Ranch Specific Plan was created in response to the growing need to accommodate the increasing population of the Inland Empire. The vision of the Lytle Creek Specific Plan is to provide a multi-generational community where residents can live, work, shop, play, and relax. The Lytle Creek Specific Plan seeks to develop with a "sense of place" that promotes security, strong neighborhood ties, and a lifestyle rich in amenities. Lytle Creek Ranch incorporates clustered development that preserves natural open space areas and a mixed-use center near the freeway. Lytle Creek Ranch also includes an Active Adult community for persons over the age of 55. Permitted residential land uses in Lytle Creek Ranch and their respective densities include the following:

Table 3-9: Lytle Creek Ranch Land Use Summary

Residential Land Use	Density Range (DU/acre)	Target Dwelling Units	Acres
Single-Family Residential One (SFR-1)	2 – 5	943	263.2
Single-Family Residential Two (SFR-2)	5 – 8	1,908	304.5
Single-Family Residential Three (SFR-3)	8 – 14	2,403	220
Multi-Family Residential (MFR)	14 – 28	1,828	106.3
High Density Residential (HDR)	25 – 35	1,325	45.4
TOTAL	**--**	**8,407**	**939.4**

Source: Lytle Creek Ranch Specific Plan, 2012

Pepper Avenue Specific Plan

The Pepper Avenue Specific Plan includes a total of 101.7 acres intended to provide commercial and residential needs to neighboring community and within close accessibility to the freeway. The Pepper Avenue Specific Plan also provides for green, open space and encourages pedestrian and bicycle connectivity.

The Pepper Avenue Specific Plan includes a Multi-Family Residential Overlay to provide flexibility in land uses and future housing needs. The maximum density is 30 dwelling units per acre and a total maximum of 275 units for the Specific Plan area. Residential developments are restricted to the Pepper Avenue Specific Plan's PA 3 area.

Renaissance Specific Plan

The Renaissance Specific Plan is located on 1,439 acres and is intended to include a variety of logistics, employment, business, shopping, residential, and community facilities that are integrated by open spaces and amenities.

Permitted residential land uses in the Renaissance Specific Plan and their respective densities include the following:

Table 3-10: Renaissance Land Use Summary

Residential Land Use	Target Density (DU/acre)	Total Dwelling Units	Acres
Low Density Residential (LDR)	8	446	61.9
Medium Density Residential (MDR)	12.5	290	25.8
Medium High Density Residential (MHDR)	16	818	56.8
High Density Residential (HDR)	25	113	5
TOTAL	**--**	**1,667**	**149.5**

Source: Lytle Creek Ranch Specific Plan, 2012

Rialto Central Area Specific Plan

The Rialto Central Area Specific Plan allows for a single-family, multi-family, and increased density residential developments. The intent of the Rialto Central Area Specific Plan is to provide residential uses in conjunction with commercial uses to improve the economic vitality of the central area of Rialto.

6. Variety of Housing Types Permitted

California Housing Element Law mandates jurisdictions must make sites available through zoning and development standards to promote the development of a variety of housing types for all socioeconomic levels of the populations. Housing types include single-family homes, multi-family housing, accessory dwelling units, factory-built homes, mobile-homes, employee and agricultural work housing, transitional and supportive housing, single-room occupancy (SROs), and housing for persons with disabilities. **Table 3-11** shows the various housing types permitted throughout the City of Rialto.

Table 3-11: Permitted Housing Types

Housing Types	A-1	R-1	R-1 A-10,000	R-1 B	R-1 C	R-1 D	R-3	R-4	A-P	O-P	I-P
Single-Family Dwellings	P	P	P	P	P	P	P	P	-	-	-
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	-	-	-
Room and Board Facilities	-	CUP	CUP	CUP	CUP	-	CUP	CUP	-	-	-
Multiple Family Dwellings (4 or less units)	-	-	-	-	-	-	P	P	-	-	-
Multiple Family Dwellings (5 or more units)	-	-	-	-	-	-	CUP	P	-	-	-
Dwelling Groups	-	-	-	-	-	-	P	P	-	-	-
Apartment Houses	-	-	-	-	-	-	-	P	-	-	-
Boarding and Rooming Houses	-	-	-	-	-	-	-	P	-	-	-
Sanitariums	-	-	-	-	-	-	-	-	CUP	CUP	-
Nursing Homes	-	-	-	-	-	-	-	-	CUP	CUP	-
Emergency Shelter	-	-	-	-	-	-	-	-	-	-	P
Manufactured Homes	-	P	P	P	P	P	-	P	-	-	-
Supportive Housing	P	P	P	P	P	P	-	P	-	-	-
Transitional Housing	P	P	P	P	P	P	-	P	-	-	-
Farmworker Housing	-	-	-	-	-	-	-	-	-	-	-
Low Barrier Navigation Center	-	-	-	-	-	-	-	-	-	-	-

Notes:
P – Permitted
CUP – Conditional Use Permit
(-) – Not specified
Source: City of Rialto Zoning Code

Single-Family Dwelling/ One Family Dwelling

A single-family dwelling is defined by the Rialto Zoning Code as a detached building designed and/or used as a single dwelling unit. A single-family dwelling may only be used as a residence. Rialto has a number of zoning districts which permit the development of single-family dwelling units. These single-family zones make up the majority of residential zones within the City. While single-family zoning may be considered a constraint to the development of higher density housing, and specifically affordable housing, the City was historically developed as a residential community. A variety of housing types and higher density zoning districts have been added over time to meet the changing needs of the community and housing trends. Therefore, the prevalence of single-family dwelling units and zoning districts does not pose a constraint as the City continues to adjust for and meet the evolving housing needs of the community.

Accessory Dwelling Unit (ADU)/ Accessory Living Quarters

An ADU is defined as a detached subordinate building with an incidental use to the main building. A garage attached to the main building is considered a part of the main building. As of 2020, the State of California permits ADUs to be located in a detached building on the same lot and also within the primary residence. ADUs must include a full bathroom, utilities, a kitchenette/kitchen, and its own private entrance. The Rialto Zoning Code permits ADUs in all residential zoning districts and thus does not create a constraint.

Accessory living quarters are located within an accessory building and provide lodging for persons employed on the premises or for temporary use by guests. The Rialto Zoning Code does not permit a kitchen or cooking facilities in these accessory living quarters, nor can they be rented out or used as a separate dwelling unit.

Room and Board Facilities

Room and board facilities are defined as a dwelling with one or more rooms rented, leased, or subleased to individuals under separate rental agreements, leases, or subleases. The facility may include individual or group cooking facilities. The owner of the facility may or may not reside in the same residence. Room and board facilities do not include residential, community, or group care facilities. The Zoning Code permits Room and Board Facilities with a CUP in a number of single-family zones and the medium to high density zoning districts. This does not conflict with California State Law and, therefore, does not pose a constraint.

Multiple-Family Dwellings

Multiple-family dwellings are defined as a building, or portion of a building, used and/or designed as a residence with separate and independent dwelling units. Multiple-family dwellings may include duplexes, townhomes, apartments, or condominiums. Multiple-family dwellings are permitted in the medium and high-density zoning districts. A CUP is only required for developments of five or more units in the medium-density zone. This does not create a constraint to the development of housing.

Dwelling Groups

A dwelling group refers to two or more detached buildings used as one, two, or multiple family dwellings on a single lot. Dwelling groups are permitted in the R-3 and R-4 zones. This does not pose a constraint to housing development.

Apartment Homes

A room or suite of two or more rooms with a single kitchen in a multiple dwelling building, occupied or suitable for occupancy as a residence for one family. Apartment homes are permitted in the R-4 zoning district. This does not pose a constraint to housing development.

Boarding and Rooming Houses

A boarding house is defined as a dwelling, or portion of a dwelling, that consists of a maximum of 5 guest rooms and provides lodging and meals for 5 to 15 persons. Boarding and rooming houses are permitted in the R-4 zoning district. This does not pose a constraint to housing development.

Sanitariums

An establishment for the medical treatment of people who are convalescing or have a chronic illness. Sanitariums are permitted with a CUP in the Administrative-Professional zoning districts. This does not pose a constraint to housing development.

Nursing Homes

A facility that offers 24-hour medical care provided by nurses and physicians. Nursing homes may care for frail residents totally dependent on nursing care. Nursing homes are permitted with a CUP in the Administrative-Professional zoning districts. This does not pose a constraint to housing development.

Emergency Shelter

An emergency shelter is defined as housing with minimum supportive services for persons experiencing homelessness. Occupancy is limited to six months. No individual or household may be denied emergency shelter because of inability to pay. Per Assembly Bill 139 (AB 139), emergency shelters must be permitted in at least one zoning district without approval of a CUP or other discretionary permits. In compliance with AB 139, emergency shelters in Rialto are permitted within the Industrial Park Zone (I-P), as shown in **Figure 3-1**.

There are approximately 27 parcels within the I-P zones of Rialto with a combined total of about 90.5 acres of land. The parcels range in size from 0.6 acres to 9.6 acres. Thirteen of the 27 parcels are considered vacant and underutilized which pose as potential candidate sites for the development of emergency shelters. The 14 remaining parcels are developed with various industrial, commercial, and automotive uses that may have potential for reuse in the future.

Additionally, there are multiple bus stops along East Valley Boulevard, Southern Riverside Avenue, West San Bernardino Avenue, and East San Bernardino Avenue which are all major streets surrounding the I-P zone. In addition, there are convenience stores, retail shops such as Walmart, multiple restaurants and Emergency Services such as the Rialto Fire Station 205 all within a two-mile radius.

Based on the California Office of Environmental Health Hazards Assessment, there are approximately 2 hazardous waste contributors near the I-P zones in the southern portion of the City as shown in **Figure 3-2**. The census tracts that the I-P zones are located in scored between the 60 and 80 percentiles for hazardous waste.

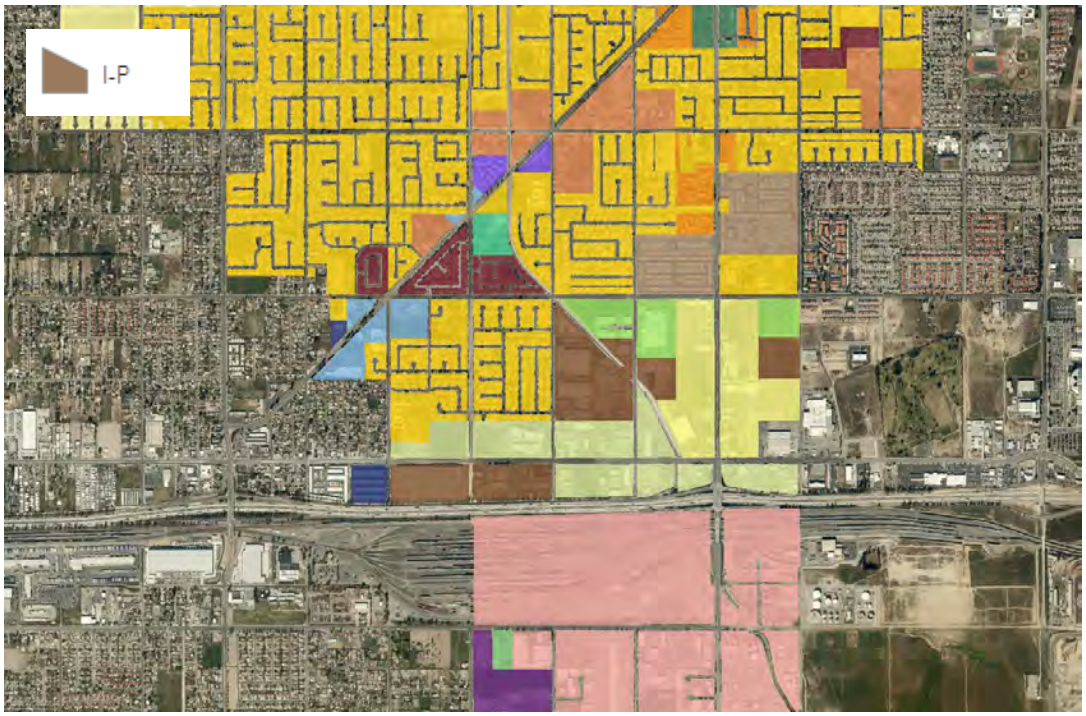
Hazardous waste is defined by the California Office of Environmental Health Hazard Assessment (OEHHA) as "Waste created by different commercial or industrial activity containing chemicals that may be dangerous or harmful to health. Only certain regulated facilities can treat, store, or dispose of this type of waste. These facilities are not the same as cleanup sites. Hazardous waste includes a range of different types of waste. It can include used automotive oil as well as toxic waste materials produced by factories and businesses."[1] The hazardous waste generators near the BP zones include the following:

- Walmart Supercenter
- Pasha Transport Inc.
- City of Colton
- CVS Pharmacy

[1] Update To The California Communities Environmental Health Screening Tool, CalEnviroScreen 3.0, 2017. Accessed online: December 16, 2021. https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf#page=90

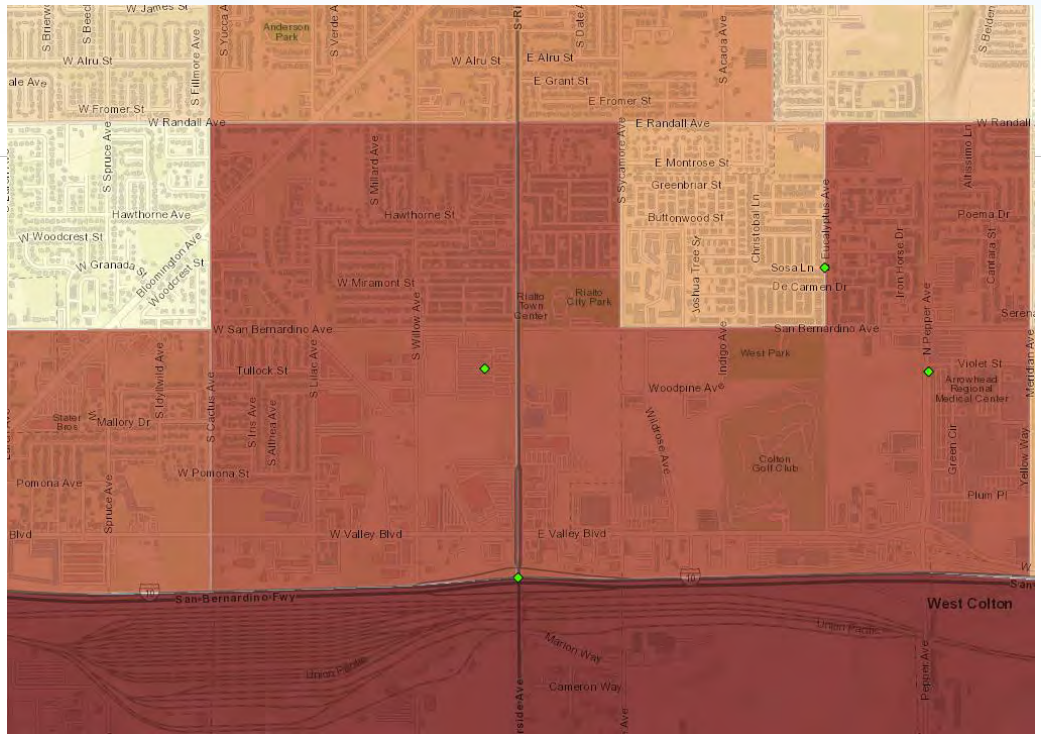
The hazardous waste generators are mainly business and a logistics center, typically not associated with the generation of chemicals of heavy manufacturing processes. By nature, these businesses include the typical household chemicals such as motor oils and lubricants, pesticides for gardening, electronic waste, medical supplies, and other materials. These businesses are required to register with the Department of Toxic Substances Control which maintains a database of permitted facilities and activities. Additionally, these facilities are required to handle and dispose of waste consistent with standards and requirements set by the Code of Federal Regulations § 262, as well as local regulations including the San Bernardino County Fire Department. The San Bernardino Fire Department is designated by the State Secretary for Environmental Protection as the Certified Unified Program Agency (CUPA) for the County of San Bernardino. The CUPA manages six hazardous materials and hazardous waste programs and conducts compliance inspections for over 7000 regulated facilities in San Bernardino County. Therefore, while these businesses create or are involved in waste generation, the waste streams are more consistent with use of materials associated with routine property maintenance, automotive maintenance, and medical supplies. Compliance with the regulatory requirements would reduce potential hazards to the public or the environment, including emergency shelters.

Figure 3-1: Map of Industrial Park (I-P) Zones in Rialto



Source: City of Rialto, Zoning Map.

Figure 3-2: Map of Hazardous Waste Contributors



Source: OEHHA, Hazardous Waste Results.

Supportive Housing

The Rialto Zoning Code defines supportive housing as housing with no limit on the length of stay, that is occupied by a target population, and that is linked to onsite or offsite services that assist the supported population in retaining the housing, improving their health, and maximizing their ability to live and work in the community. Government Code Section 65583(a)(5) requires supportive housing to be permitted in all residential zoning districts under the same restrictions as other residential dwellings of the same type in the same zone. Supportive housing in Rialto is currently permitted in all residential zoning districts, except for the R-3 district. **Section 4: Housing Plan** includes a program to update the Zoning Code in accordance with state legislation by permitting supportive housing in the R-3 zoning district.

Transitional Housing

Transitional housing is defined by the Rialto Zoning Code as temporary rental housing intended for occupancy for at least 6 months by target populations transitioning to permanent housing. Transitional housing in Rialto is currently permitted in all residential zoning districts, except for the R-3 district. **Section 4: Housing Plan** includes a program to update the Zoning Code in accordance with state legislation by permitting transitional housing in the R-3 zoning district.

Farmworker Housing

California Health and Safety Code Sections 17021.5 and 17021.6 generally requires agricultural employee housing to be permitted by-right, without a conditional use permit (CUP) or other discretionary permits, in single-family zones for six or fewer persons and in agricultural zones with no more than 12 units or 36

beds. The Rialto Zoning Code does not address Farmworker Housing by definition. A program is included in **Section 4: Housing Plan** to ensure the City's development standards allow Farmworker Housing by-right, without a CUP, in single-family zones for six or fewer persons and in agricultural zones for up to 12 units or 36 beds.

Low Barrier Navigation Centers

AB 101 states that "The Legislature finds and declares that Low Barrier Navigation Center developments are essential tools for alleviating the homelessness crisis in this state and are a matter of statewide concern-." Low Barrier Navigation Centers are 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. Low Barrier Navigation Centers are required as a use by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. The Rialto Zoning Code does not address Low Barrier Navigations Centers by definition. A program is included in **Section 4: Housing Plan** to ensure the City's development standards allow Low Barrier Navigation Centers by-right in all zones that permit mixed-uses and non-residential uses.

7. Housing for Persons with Disabilities

Both the Federal Fair Housing Amendment Act (FHAA) and the California Fair Employment and Housing Act require governments to make reasonable accommodations (that is, modifications or exceptions) in their zoning laws and other land use regulations to afford disabled persons an equal opportunity to housing. State law also requires cities to analyze potential and actual constraints to the development, maintenance, and improvement of housing for persons with disabilities.

Reasonable Accommodations

Reasonable accommodation in the land use and zoning context means providing individuals with disabilities or developers of housing for people with disabilities, flexibility in the application of land use and zoning and building regulations, policies, practices, and procedures, or even waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities. For example, it may be reasonable to accommodate requests from persons with disabilities to waive a setback requirement or other standard of the Zoning Code to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

The City of Rialto provides reasonable accommodations through its Zoning Code. Applicants may submit applications for review by the Community Development Director or Designee. The Planning Commission becomes the reviewing party when an application includes an encroachment into the front setback, a building height greater than permitted, lot coverage or floor area ratio above the permitted maximum, and/or a reduction in parking. Advance noticing and a public hearing are required when an application is reviewed by the Planning Commission. Approved reasonable accommodation applications may include conditions of approval such as:

- Periodic inspection of the location, as specified in the application, to verify continued compliance with the provisions of this section and any conditions of approval

- Removal of improvements, where removal would not constitute an unreasonable financial burden, when the expressed need for which the accommodation was granted is no longer necessary
- Time limits and/or expiration of the approval if it can be determined that the applicants' reasons for approving the accommodation no longer exists
- Recordation of a deed restriction requiring removal of the accommodating feature once the need no longer exists
- Methods, design considerations and features that reduce the impact on surrounding uses
- Methods, design considerations and features that preserve the integrity of the property and structures
- Other reasonable accommodations providing an equivalent level of benefit that will not result in an encroachment into required setbacks, permitted exceedance of height limits, lot coverage or floor area ratio requirements specified for the applicable zoning district

As the City's reasonable accommodations provide for flexibility in the development standards, they facilitate, and not constrain, the development of housing, and specifically affordable housing.

Definition of Family

A restrictive definition of "family" that limits the number of unrelated persons and differentiates between related and unrelated individuals living together is inconsistent with the right of privacy established by the California Constitution. According to the City of Rialto's Zoning Code, "family" is defined as one or more persons living together as a single nonprofit housekeeping unit in a dwelling unit in conformance with the Uniform Housing Code. The City's definition of family does not limit the number of unrelated persons living together, nor does the definition of a "one family dwelling", and it is therefore not considered a constraint to housing development.

8. Development Fees

Residential developers are subject to a variety of permitting, development, and impact fees in order to access services and facilities as allowed by State law. The additional cost to develop, maintain, and improve housing due to development fees result in increased housing unit cost, and therefore is generally considered a constraint to housing development. However, fees are necessary to provide planning and public services in Rialto.

The location of projects and housing type result in varying degrees of development fees. The presumed total cost of development is also contingent on the project meeting city policies and regulations and the circumstances involved in a particular development project application. **Table 3-12** provides the planning processing fees and **Table 3-13** provides the engineering fees. **Table 3-14** provides the Development Impact Fees related to residential developments. All fees are publicly available on the City's website.

Table 3-12: Planning Processing Fees	
Application	Fee
Application Fees	
Annexation Cost (City Cost)	Min. of $10,634.70 – FB Hourly Rate
Appeal to Planning Commission Action to City Council	$1,369.60 + City Clerk Actual Cost
Conditional Development Permit (Minor)	$2,292
Conditional Development Permit (Major)	$3,241.50
Development Agreement (City Cost)	Min. of $3,987.70 – FB Hourly Rate
Environmental Negative Declaration	$1,586.70 + Dept. of Fish & Game filing fee
Environmental Categorical Exemption	$338.90 + Dept. of Fish & Game filing fee
Environmental Impact Report Review & Processing	City EIR Contract Cost + 5% Dept. Admin.
Extension of Time for Land Divisions	$705.10
General Plan Amendment	Min. of $4,087.50 – FB Hourly Rate
Geologic Review Fee Plus Cost for Consultant Review	$1,274.80
Landscape Plan Review	$366
Lot Line Adjustments	$786.40
Planning Commission Determination of Use	$1,612.80
Precise Plan of Design - Residential	
Residential, < 5 acres	$2,468.40
Residential, 5-10 acres	$3,092.30
Residential, > 10 acres	$3,702.60
Revisions of Approved Precise Plan of Design	$1,261.30
Specific Plan Review (City Cost)	City Contract Cost + 5% Dept. Admin.
Specific Plan Amendment Review (City Cost)	Deposit of $4,978.50 – FB Hourly Rate
Temporary Use Permit	$1,586.70
Tentative Parcel Map Review	$2,821
Tentative Parcel Map Review (Residential) 5 Lots or more	$4,462.10
Vested Tentative Tract Map Review (City Cost)	$5,927
Variance Review (Minor – Non-Public Hearing)	$1,329
Variance Review (Major – Public Hearing)	$1,329
Zone Change Review	$4,597.80
Zoning Verification Letter	$189.60
Source: City of Rialto Schedule of Fees – Development and Planning (06/15/2021)	

Table 3-13: Engineering Fees	
Application	Fee
Plan Check Fees – Subdivision Maps	
Tract Maps	$4,563.30
Parcel Maps	$4,563.30
Plan Check Fees – Plans	
Rough Grading Plan	$1,636.90
Precise Grading/Paving Plan	$1,636.90
Sewer Improvement Plan	$2,862.20
Water Improvement Plan	$2,862.20
Storm Drain Improvement Plan	$1,636.90
Landscape Plan (Public LMD)	$2,538.30
Irrigation Plan (Public LMD)	$2,538.30
Revisions to Approved Plans	$475.50
Surveying Services	
Lot Line Adjustment/Parcel Mergers	$1,118.40
Right of Way Dedication/Vacation	$1,118.40
Public Easements	$1,118.40
Annexation to Maintenance District	$1,776.80
Source: City of Rialto Schedule of Fees – Engineering (06/15/2021)	

Table 3-14: Development Impact Fees				
Development Fee Categories	Fees per Dwelling Unit Type			
	Estate	Single-Family	Multi-Family	Mobile Homes
General Facilities	$2,113.79	$2,113.79	$1,991.88	$1,991.88
Law Enforcement	$1,500.63	$1,500.63	$1,415.29	$1,415.29
Fire Protection	$1,104.44	$1,104.44	$1,042.28	$1,042.28
Park Development	--	$3,648.54	$3,440.08	$3,440.08
Quimby in lieu Fee	--	$6,337.71	$5,975.66	--
Open Space	$1,026.92	$606.82	$137.81	$328.62
Library Facilities	$377.89	$377.89	$355.96	$355.96
Regional Traffic Fees	--	$3,533	$2,448	--
Street Medians	$53.46	$53.46	$35.16	$26.93
Storm Drain Facilities	$6,085.36/DU $12,171.95/Acre	$4,126.39/DU $20,286.99/Acre	$1,399.45/DU $24,343.9/Acre	$1,399.45
Sewage Collection	$875.25	$875.25	$743.97	$743.97
Sewage Treatment	$2,066.07		$1,755.26	--
Fair Share Fees				
Renaissance Specific Plan/EIR Fee	$4,044.01/Acre			
Renaissance Specific Plan – Traffic Mitigation Fair Share Fee	$396.86		$204.32	--

Table 3-14: Development Impact Fees				
Development Fee Categories	Fees per Dwelling Unit Type			
	Estate	Single-Family	Multi-Family	Mobile Homes
Pepper Avenue Specific Plan – Improvement Fee	$513.72			
Pepper Avenue Specific Plan – EIR/SP Fee	$13,270.23/Acre			
Source: City of Rialto Development Impact and Fair Share Fees, Effective July 22, 2020.				

The development fees associated with each project is dependent on the housing type, density, intensity of use, and location. In addition to these direct fees, the total cost of development is contingent on the project meeting the City's policies and standards, as well as the project applicant submitting necessary documents and plans in a timely manner.

The estimated total development and impact fees for a typical single-family residential project measuring 3,000 square feet and located on a 9,000 square foot lot, assuming it is not part of a subdivision and is consistent with existing city policies and regulations, can range from $30,639 to $35,639. Estimated total development and impact fees for a typical multi-family residential project measuring 34,848 square feet with ten units and located on a one-acre lot, assuming it is consistent with existing city policies and regulations range from $56,483 to $61,483.

These estimates are illustrative in nature and that actual costs are contingent upon unique circumstance inherent in individual development project applications. Considering the cost of land in Rialto, and the International Code Council (ICC) estimates for cost of labor and materials, the combined costs of permits and fees range from approximately 6 percent to 7 percent of the direct cost of development for a single-family residential project and 1.2 percent to 1.3 percent for a multi-family residential project. Direct costs do not include, landscaping, connection fees, on/off-site improvements, shell construction or amenities, therefore the percentage of development and impact fees charged by the City may be smaller if all direct and indirect costs are included.

9. On-/Off-Site Improvements

Site improvements in the City consist of those typically associated with development for on-site improvements (improvements within the lot or property boundaries specific to the project or development) and off-site improvements which are required as a result of a development or project (curb, gutter, sidewalk, road widening and upgrading; stormwater facilities; and traffic improvements). Thus, these are costs that may influence the sale or rental price of housing.

Because residential development cannot take place without the addition of adequate infrastructure, site improvement requirements are considered a regular component of development of housing within the City and are therefore not considered a constraint to development. The majority of cost associated with on- and off-site improvements is reimbursed to the City in the form of Development Impact Fees as these improvements would impact public facilities such as water and sewer lines.

For single-family residential development on vacant land, examples of typical on-site improvements might include stormwater detention facilities (required by the Clean Water Act), roads, sidewalks, perimeter walls, fire hydrants, emergency access drivers, and recreational trails. Multifamily developments may also include common open space and recreational areas, as well as lockable storage areas.

Typical off-site improvements for both single-family and multi-family developments might include: new curbs, gutters, and sidewalks, recreational trail facilities, road improvements and traffic control needed to serve the development, street trees, and landscaping. Utilities may need to be updated or installed to serve the development, including water mains, sewer mains, stormwater pollution prevention measures, and undergrounding of electric utilities.

Infill residential projects may be required to install any of the improvements listed above, depending on site-specific circumstances and neighborhood needs.

Specific required improvements can be found in Chapter 17.20.080 – Improvements Required of the Rialto Municipal Code. Subdivisions require the improvement, or agreement to improve, all streets, highways, alleys, ways or easements as a condition of acceptance and approval of the final subdivision map. Improvements include:

- Grading, drainage, and drainage structures necessary to proper use and to the public safety;
- Curbs and gutters;
- Sidewalks of a width and quality as the Planning Commission may consider suitable for the local neighborhood use;
- Pavement of a width and quality suitable for local neighborhood traffic;
- Adequate domestic water supply and the transfer and conveyance to the City of all right, title and interest in and to the overlying water rights of the property;
- Sanitary sewer facilities and connections for each lot in such manner as will obviate the necessity for disturbing the street pavement, gutter, curb and sidewalk when service connections are made;
- Services from public utilities where provided;
- All trees shall be planted as required by the Department of Development Services in locations selected by said department and the reasonable cost of the street and planting thereof shall be paid by the subdivider;
- Street lights;
- Permanent subdivision survey monuments;
- In addition to the minimum improvements, the Planning Commission shall recommend, and the City Council shall require such additional improvements and facilities or such modification in the standards of minimum improvements as special conditions may cause the Planning Commission to make a special finding of need;
- All water lines are to be paid pursuant to plans and specifications of the City;
- Utility lines, including but not limited to electric, communications, street lighting, and cable television, shall be required to be placed underground.

Specific design standards for subdivisions can be found in Chapter 17.44 – Design Standards of the Rialto Municipal Code. The minimum standards include but are not limited to:

- Dedication of land for streets, alleys, floodways, and easements for:
    - Major streets and thoroughfares for opening or widening as shown in the general plan of the City, at the widths shown on such plan;
    - Local streets, not less than 60 feet in width or to complete dedications to that width of previously dedicated portions of streets, and located to provide natural drainage with no drainage pockets and adjusted to the topography, minimum number of intersections with major streets or thoroughfares;
    - Alleys, not less than 20 feet in width in all areas zoned or proposed for industrial, commercial, or multiple family use, with corner cut-off;
    - Easements: for flood channels at such widths as the county flood control officer or city engineer may indicate, utilities at the rear, or side, of lots may be necessary to serve the property and in a form satisfactory to the public utility companies which are authorized to serve the area;
    - Small parks or other public areas as may be appropriate;
    - Bridle trails and/or bikeways where, in the judgment of the planning commission, they may be necessary or desirable.

Building Codes and Community Compliance

The City has adopted the 2019 California Building Code, including the ancillary information within the tables, attachments, addendums, and footnotes. This would include the California Administrative Code, Building Code, Residential Code, Electrical Code, Mechanical Code, Plumbing Code, Energy Code, Historical Building Code, Fire Code, Existing Building Code, Green Building Standards Code, and California Referenced Standards Code. The adoption of the California Building Code therefore ensures a consistent development standard that would be promoted throughout the State.

The City's building code also requires new residential construction to comply with the Federal American Disabilities Act (ADA) standards, which specify that a minimum percentage of dwelling units in new developments must be fully accessible to persons with physical disabilities. While the incorporation of these measures may raise the cost of construction and therefore housing, these standards are necessary to provide access to homes for people with disabilities. As building codes are adopted by most cities throughout the Southern California region, they do not pose a constraint to the development of housing in Rialto.

Local amendments were made to the California Building Code in 2019 to facilitate fire safety and standards related to Rialto. As part of the amendment process, the City adopted appropriate findings as required by State law. Modified fire standards include those tailored specifically to tall buildings so that fire personnel may reach upper floors during emergencies. These standards include automatic fire sprinkler systems and pressurized doors for buildings with more than 55 feet above the lowest floor having building access. The amendment could be considered a constraint because it requires the installation of an automatic sprinkler system in all Group R, Division 1 occupancies, which include apartment houses. This is a standard amendment and helps prevent and quickly extinguish fires that may have far costlier impacts; therefore, it is not considered a constraint to housing development.

The City's Community Compliance Division provides service to the Rialto community and business partners. Most Community Compliance cases address concerns from residents and proactive work done by officers to maintain the aesthetics and value of property in the City. Some of the more common concerns include the following:

- Illegal vendors
- Inoperable vehicles in public view
- Parking on unpaved surfaces
- Property maintenance, health, and safety violations

10. Local Processing and Permit Procedures

The development community commonly cites the permit processing time as a contributor to the high cost of housing. Depending on the magnitude and complexity of the development proposal, the time that elapses from application submittal to project approval may vary considerably. Factors that can affect the length of development review on a proposed project include the completeness of the development application and the responsiveness of developers to staff comments and requests for information. Approval times are substantially lengthened for projects that are not exempt from the California Environmental Quality Act (CEQA), require rezoning or general plan amendments, or encounter community opposition. Applicants for all permits or reviews are recommended to request a preapplication meeting to: confirm City requirements as they apply to the proposed project; review the City's review process, possible project alternatives or revisions; and identify information and materials the City will require with the application, and any necessary technical studies and information relating to the environmental review of the project.

All permit applications are first reviewed by City Staff for completeness, and discretionary applications must then receive a recommendation through a staff report prior to a review by the appropriate authority. Various applications may also require public noticing and a public hearing. **Table 3-15** identifies the appropriate review process and requirements for each planning permit application.

Rialto's planning review process and requirements are similar to that of other jurisdictions in the region. Additionally, planning application decisions are appealable to Planning Commission and City Council. The Planning review process may vary based on the applications preparedness level. Typically, single-family projects take anywhere from a day to two weeks; multi-family projects may take between 4 months to a year; and ADUs go directly to the Building Division for permits.

The amount of time between when a project receives approval and submittal of an application for building permits varies, depending upon a variety of factors and is controlled by a project applicant. While the City makes every effort to streamline permitting processes, this element of time is outside the control of the City. Factors for variability of time may include the size of a project, type of construction, funding and financing considerations, lease or contract considerations, litigation, seasonal factors, engineering, design and architectural considerations. The timeline can be a matter of a few days to a few weeks, if the project is small and uncomplicated (e.g. ADU/JADU) to months for large-scale, modern construction. The City of Rialto views the longer time period as common and necessary for larger, more complicated projects and does not see this in any way as hindering the construction of housing or introducing unnecessary delays.

In most cases, the timeline from receiving approval to submitting for building permits is solely dictated by the project applicant and not constrained by any requirements placed upon the applicant by the City.

Based upon the City's estimation of past projects the following timelines between approval/entitlement of a project and issuance of building permits are as follows:

- Single Family Residential/ADU/JADU – a few days to 4 weeks.
- Multifamily Residential (small <20 du) – 4-8 weeks
- Multifamily Residential (larger >20 du) – 8-20 weeks
- Mixed Use (large scale) – 8 weeks to 1 year

The City can demonstrate that the vast majority of delays in issuance of permits are due to applicant considerations and may be influenced by weather, funding, financing, phasing or other considerations. Although the City does not see these timelines as a constraint, Program 4G provides for annual review and updating of review timing, objective standards and overall improvement to permit processing.

Overall, the application and review process is not considered a constraint to housing development. A program is included in **Section 4: Housing Plan** to bi-annually review the City's permit processing procedures for potential issues that may affect development costs and approval certainty.

Table 3-15: Planning Application Review Process and Requirements

Planning Application	Public Notice Required	Public Hearing Required	Recommending Authority	Final Review Authority	Notice of Decision
Variance	Yes	Yes	Community Development Department	Planning Commission	Yes
Minor Variance	No	No	Community Development Department	Community Development Director	No
Precise Plan of Design (PPD) – CEQA Exempt	No	No	Community Development Department	Community Development Director	Yes
Precise Plan of Design (PPD) with CEQA	Yes	Yes	Community Development Department	Planning Commission	No
Conditional Development Permits	Yes	Yes	Community Development Department	Planning Commission	Yes
Appeals to the City Council	Yes	Yes	Planning Commission	City Council	Yes
Environmental Review					
CEQA Exempt	No	No	Community Development Department	Community Development Director	No
ND or MND Required	Yes	Yes	Community Development Department	Planning Commission	Yes

Table 3-15: Planning Application Review Process and Requirements					
Planning Application	Public Notice Required	Public Hearing Required	Recommending Authority	Final Review Authority	Notice of Decision
EIR Required	Yes	Yes	Planning Commission	City Council	Yes
Specific Plan	Yes	Yes	Planning Commission	City Council	Yes
Development Agreement	Yes	Yes	Planning Commission	City Council	Yes
Source: City of Rialto, Title 18 - Zoning Code					

Subjectivity

While the City's current permit processing procedures are not generally identified to be a constraint to development, the Zoning Code includes subjective language which may lead to uncertainty in project approvals. For example, to grant a Conditional Development Permit, the City must make the following findings:

- The proposed use and development are deemed essential or desirable to provide a service or facility which will contribute to the convenience or general well-being of the neighborhood or community;
- The proposed use and development will not be detrimental or injurious to the health, safety or general welfare of persons residing or working in the vicinity;
- The site for the proposed development is adequate in size, shape, topography, accessibility and other physical characteristics to accommodate the proposed use and development in a manner compatible with existing land uses;
- The development site has adequate access to those utilities and other services required for the proposed use;
- The proposed use will be arranged, designed, constructed and maintained so as it will not be injurious to property or improvements in the vicinity or otherwise be in harmonious with, the general plan of this city and its objectives, zoning ordinances or any applicable specific plan and its objectives;
- Any potential adverse effects upon the surrounding properties will be minimized to every extent practical and any remaining adverse effects shall be outweighed by the benefits conferred upon the community or neighborhood as a whole.

Language such as "desirable" and "general well-being of the neighborhood or community" may lead to project denials and increased processing and review time, which may increase development costs. As such, **Housing Program 4G** is included in the Housing Plan to provide for a review and modification of subjective language to promote objectivity and approval certainty.

Single-Family Senate Bill 35

California Senate Bill 35 (SB 35), codified as Government Code Section 65913.41, was signed on September 29, 2017, and became effective January 1, 2018. SB 35 will automatically sunset on January 1, 2026

(Section 65913.4(m)). The intent of SB 35 is to expedite and facilitate construction of affordable housing. SB 35 applies to cities and counties that have not made sufficient progress toward meeting their affordable housing goals for above moderate- and lower-income levels as mandated by the State. In an effort to meet the affordable housing goals, SB 35 requires cities and counties to streamline the review and approval of certain qualifying affordable housing projects through a ministerial process.

When a jurisdiction has made insufficient progress toward their Above Moderate income RHNA and/or have not submitted the latest Housing Element Annual Progress Report (2018) it is subject to the streamlined ministerial approval process (SB 35 (Chapter 366, Statutes of 2017) streamlining) for proposed developments with at least 50-percent affordability. All projects, which propose at least 50-percent affordable units within Rialto are eligible for ministerial approval under SB 35 as determined by the SB 35 Statewide Determination Summary. To be eligible for SB 35 approval, sites must meet a long list of criteria, including:

- A multifamily housing development (at least two residential units) in an urbanized area;
- Located where 75% of the perimeter of the site is developed;
- Zoned or designated by the general plan for residential or mixed use residential;
- In a location where the locality's share of regional housing needs has not been satisfied by building permits previously issued;
- One that includes affordable housing in accordance with SB 35 requirements;
- Consistent with the local government's objective zoning and design review standards; and
- Willing to pay construction workers the state-determined "prevailing wage."

A project does not qualify for SB 35 streamline processing if located in or on:

- A coastal zone, conservation lands, or habitat for protected species;
- Prime farmland or farmland of statewide importance;
- Wetlands or lands under conservation easement;
- A very high fire hazard severity zone;
- Hazardous waste site;
- Earthquake fault zone;
- Flood plain or floodway;
- A site with existing multi-family housing that has been occupied by tenants in the last ten years or is subject to rent control; or
- A site with existing affordable housing.[2]

According to HCD's SB 35 Statewide Determination Summary (based on APR data received as of June 25, 2019), the City of Rialto has not made sufficient progress towards its Above Moderate RHNA and is therefore subject to SB 35. The City is subject to the streamlined ministerial approval review for proposed developments with at least 10 percent affordability. **Section 4: Housing Plan** includes policy and program updates to create review processes for proposed projects using SB 35 streamlining.

[2] JD Supra Knowledge Center, "How California's SB 35 Can Be Used to Streamline Real Estate Development Projects", Accessed March 26, 2021.

11.Infrastructure Constraints

Another factor that could constrain new residential construction is the requirement and cost to provide adequate infrastructure (major and local streets; water and sewer lines; and street lighting) needed to serve new residential development. In most cases, where new infrastructure is required, it is funded by the developer and then dedicated to the City, which is then responsible for its maintenance. Because the cost of these facilities is generally borne by developers, it increases the cost of new construction, with much of that increased cost often "passed on" as part of home rental or sales rates.

Dry Utilities

Dry utilities include electric, telephone, TV, internet, and gas service in a community.

Electricity

Southern California Edison (SCE) provides electricity to the City. According to the California Energy Commission, SCE consumed approximately 80,912 million kilowatts per hour (kWh) of electricity in 2019. SCE continues to provide energy to the state of California through a series of methods including oil, natural gas, renewable energy resources and alternative diverse supplies. SCE is responsible for providing service to all existing and future development in Rialto.

Natural Gas

The Southern California Gas Company (SCGC) provides natural gas service to Rialto and is the nation's largest natural gas utility provider with more than to 21.8 million consumers across 24,000 square miles throughout Central and Southern California. As public utilities, SCGC and SCE are under the jurisdiction of the California Public Utilities Commission (CPUC) which regulates natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipelines system, storage, procurement, metering, and billing. Most of California's natural gas supply comes from out of the state. SCGC is responsible for providing service to residential, industrial, and commercial customers in Rialto.

Water Supply and Wastewater Capacity

Water Supply

The City of Rialto relies upon local water sources. The majority of the City's water supply comes from local surface water and groundwater supplies. Surface water sources include Lytle Creek in the San Bernardino Mountains and Silverwood Lake. According to the City's General Plan, about two-thirds of the potable water supply comes from groundwater within the Lytle, Rialto, Bunker Hill, and North Riverside aquifers.

Three water agencies are responsible for water in the City of Rialto: The City of Rialto Department of Public Works Water Division, the West Valley Water District (WVWD), and the Fontana Water Company (FWC). The FWC is the only private investor-owned company, while the other two providers are public agencies. Each agency is further described below.

Rialto Public Works Department Water Division

According to the City's General Plan Investing in Our Future Section, the Rialto Public Works Department Water Division serves approximately 8.5 square miles between Baseline Avenue to Rialto Avenue.

The Water Division reports that groundwater supplies have been decreasing in past years as a result of long-term drought conditions and overexploitation of groundwater, as well as the shutdown of several wells related to perchlorate contamination in the northern portion of the City. The shutdown of these wells has resulted in a nearly 48 percent reduction of available water– placing the City in a water supply emergency.

West Valley Water District (WVWD)

The WVWD serves approximately 29 square miles north of Highland Avenue and in areas south of Rialto Avenue. The District's water is sourced from local surface water, ground water, and the State Water Project; they are also authorized to draw water from the Lytle Creek, Rialto/Colton, Bunker Hill, North Riverside, and Chino groundwater basins. About half of the WVWD's water demand comes from Rialto residents.

Fontana Water Company (FWC)

The FWC serves properties along the City's western edge. Water produced by the FWC comes from wells in the Chino Basin, Lytle Basin, Rialto Basin, an Unnamed Basin, and surface water from Lytle Creek. The Company also purchases untreated State Water Project water from San Bernardino Valley Municipal Water District (SBVMWD).

Wastewater

Wastewater in Rialto is maintained and operated by the City. This includes a wastewater collection system and treatment plant that serves most properties within the City. There are a number of unsewered, older residential properties south of Santa Anna Avenue and on the eastern and western edges of the City.

The City of Rialto's sewer system is expected to continue meeting the needs of current developments in the City through the next 50 to 100 years. The City has expansion plans set within the City limits and in the Sphere of Influence in order to meet the needs of the community as development and population increases.

Recycled Water

The City uses recycled water from treated wastewater for non-potable uses within the community. Recycled water is mostly used for landscaping irrigation needs in an effort to conserve potable water. In addition, the City of Rialto supplies Caltrans with recycled water for the irrigation of landscaping along the Interstate 10.

Plans for expanding the City's tertiary treatment plants and reclaimed water systems are set in order to meet the community's needs and reduce the need to purchase water from wholesalers.

Fire and Emergency Services

Administration

Fire Department Administration provides oversight to all Fire Department operations including project development, budgeting, development of policy and protocol, personnel development, and strategic planning to ensure highly effective fire and life safety services.

Fire Administration is staffed by the Fire Chief with an Executive Assistant, a Division Chief of Operations, Administrative Battalion Chief, and one office specialist position. The management principles of the fire department are discipline, division of labor, unity of command, and span of control.

Fire Prevention

The Rialto Fire Department deploys from five fire stations staffed 24 hours per day by career firefighters, non-safety ambulance operators, and one administrative office. Daily EMS and Fire/Rescue staffing consists of one Battalion Chief, four engine companies, one truck company, and four paramedic ambulances each day. On-duty personnel also provide staffing for a Hazardous Materials unit, Urban Search and Rescue vehicle, a Type III Wildland Brush Engine and an OES assigned Type VI Wildland Fire Engine. The Rialto Fire Department members respond to over 12,000 incidents per year while serving over 100,000 residents in Rialto as well as mutual aid support throughout California as part of the Master Mutual Aid System

Emergency Medical Services (EMS)

The Rialto Fire Department Emergency Medical Service provides planning, compliance, review, and oversight for the provisions of clinical medical care. The Rialto Fire Department provides first responder and ambulance transportation services to the City. The Fire Department staffs all fire engines, trucks, and ambulances with at least one Paramedic. All other positions are staffed by Emergency Medical Technicians.

The City of Rialto is fortunate to be one of the few city owned and operated ambulance transportation programs in the state. This local control results in greater continuity of care, faster response times, innovative treatment and response options, and options to lower the cost of ambulance transport to our community members. The Fire Department also has an Ambulance Operator program that allows for further reductions in cost and increase deployment efficiency.

Fire Prevention Division

The Fire Prevention Division is responsible for enforcing fire and life safety codes mandated by the State and adopted by the City. This is accomplished through annual inspection programs, new construction plan review, public education, and community involvement. The Fire Prevention Division addresses a variety of risks in the community through innovative programs like drowning prevention, child car seat safety, and juvenile fire setter programs. These preventative and educational programs continue to have a measurable impact on the safety of our community assets, residents, and visitors.

The Fire Prevention Division has many successful initiatives, including the award winning Stewie the Duck program, which has dramatically reduced the occurrence of drowning in Rialto.

Disaster Preparedness

The Fire Department leads the City's disaster preparedness and response program to facilitate effective preparation, mitigation, and response to a natural or man-made disaster. The City's disaster management team is made up of employees from every department within the City who are trained in specific roles in emergency management. This team communicates with county, state, and federal disaster coordinators

to coordinate resources and ensure that our community receives the needed resources to facilitate a rapid recovery.

Police Services

The Rialto Police Department acts as the City's enforcement agency to provide general law enforcement. The Rialto Police Department employs 176 total employees. The department services 28.5 square miles with a population of over 100,000 people.

The Rialto Police Department is organized into three divisions: Operations, Support Services, and Professional Standards. The Operations Division is made up of 3 Bureaus, 6 Teams and Units, and 2 Programs. The Support Services Division is made up of 8 Bureaus and 1 Program. The Professional Standards Division is responsible for investigating complaints that are received from members of the public concerning the performance, demeanor, and behavior of police personnel. The unit also conducts internal investigations concerning violations of Department policy and criminal law that are reported by police personnel and maintains confidential personnel files of employees.

12. Environmental Constraints

The City is susceptible to several potential environmental constraints to the development of housing, including geologic and seismic hazards, flooding, and fire hazards, all of which are detailed below.

Geologic and Seismic Hazards

The City of Rialto is located south of the San Gabriel Mountains, and like many cities in California, is situated along major fault traces. Rialto is located in a region with sharp contrasts in terrain. The gently sloping lands in south Rialto abruptly confront the rise of the San Gabriel Mountains to the north – a result of tectonic movement of the San Andreas Fault and its subsidiary faults. The poorly consolidated alluvium underlying virtually all properties in the City can result in devastating effects in the event of an earthquake. Seismic and geologic hazards have great potential for causing devastating damage citywide. Earthquakes can affect widespread areas, trigger many secondary effects, and overwhelm the ability of local jurisdictions to respond. Although it is impossible to predict the timing of seismic events, sound planning practices and public education can help minimize the associated effects.

Seismic Hazards

Rialto is susceptible to ground shaking caused by the several local fault systems. Historically, Rialto has experienced moderate to strong ground shaking associated with such events as the 1812 Wrightwood earthquake (estimated 7.5 magnitude), 1899 Cajon Pass earthquake (estimated 5.7 magnitude), 1933 Long Beach earthquake (6.4 magnitude), 1971 Sylmar earthquake (6.6 magnitude), and 1994 Northridge earthquake (6.7 magnitude).

Faults

Significant faulting occurs along the Lytle Creek Wash. The San Andreas fault, the feature that defines the coming together of the Pacific and North American tectonic plates, crosses to the northeast of Rialto through the city of San Bernardino. Rialto sits atop the Pacific Plate, which is moving north relative to San Bernardino. It has been said that in about 15 million years, Rialto will be hundreds of miles north of San Francisco.

The San Jacinto, San Andreas, and Cucamonga faults have the potential of generating earthquakes of maximum magnitudes ranging from 6.7 to 8.0. Shaking at these levels would cause moderate damage to buildings constructed with the latest building codes.

Flooding

Rialto and the surrounding areas are subject to unpredictable seasonal rainfall. During intense rainfall, the geographic and geologic characteristics typical of the Upper Santa Ana River Valley, where Rialto is located, make this area especially vulnerable to flood hazards. The gently sloping alluvial fan upon which Rialto sits emanates from a deep canyon within the San Gabriel Mountains; this contributes to the City's vulnerability to flood hazards.

In the early 1900s, the region was subjected to episodes of severe flooding. In response, the Army Corps of Engineers, the San Bernardino County Flood Control District (SBCFCD), and the City built numerous structures to control flood hazards. The first line of defense against flooding is a series of eight levees constructed along the western edge of Lytle Creek. Next, a regional storm drain system was built and is maintained by the SBCFCD. Within Rialto, this system includes three buried pipelines (the East Fontana Storm Drain, the East Rialto Storm Drain, and the Rialto-Baseline Storm Drain). The region's most significant and largest drainage facility is the Rialto Channel, a mostly open, earthen, and concrete-lined channel that extends from the Cactus Basins in the central part of the City south to the Santa Ana River. The County system also includes several retention basins that not only provide flood control but also serve as recharge basins.

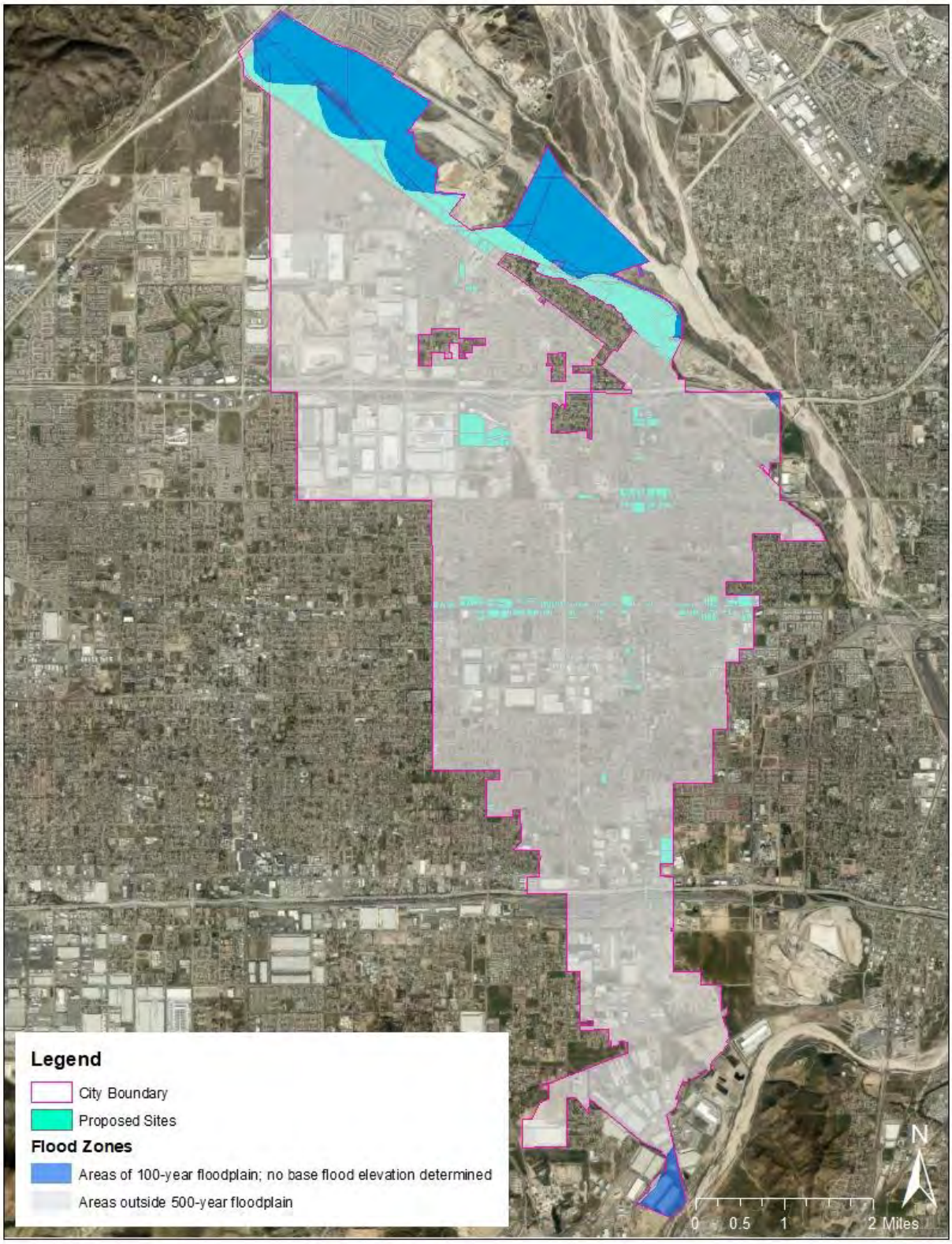
The developed portions of Rialto are served by an extensive municipal storm drain network that is maintained by the City and designed to collect urban runoff resulting from typical storm events. These ultimately discharge to the Santa Ana River. While existing flood control structures have provided significant protection from uncontrolled flooding, inadequacies in the local drainage system have caused occasional localized flooding.

100-Year Floods

One-hundred-year floods are those that have a 1/100 or one percent chance of occurring in any given year. The 100-year flood is a regulatory standard used by Federal agencies and most states to administer floodplain management programs and is also used by the National Flood Insurance Program (NFIP) as the basis for flood insurance requirements nationwide. Flood insurance rates are based on FEMA designations of flood zones. Standard practice is to avoid or restrict construction within 100-year flood zones, or to engage in flood-proofing techniques such as elevating building pads or constructing walls and levees. Portions of the City of Rialto are located within a 100-year flood plain.

Figure 3-3 illustrates the flood zones within the City of Rialto in relation to the proposed sites selected for future housing. The majority of the sites are located outside of the 500-year flood zone which is considered an area of minimal flood hazard and does not present as a constraint to the development of housing. However, there are 25 housing sites partially located within the 100-year flood zone. All of these sites are a part of the Lytle Creek Ranch Specific Plan which has previously gone through environmental evaluation and are approved for housing development. Additionally, all of the proposed housing sites are to be serviced by the City's emergency services.

Figure 3-3: Flood Zones and Proposed Sites



Source: FEMA, Flood Zones SCAG, published by Southern California Association of Governments, 2019, accessed December 2021.

Fire Hazards

Wildland Fires

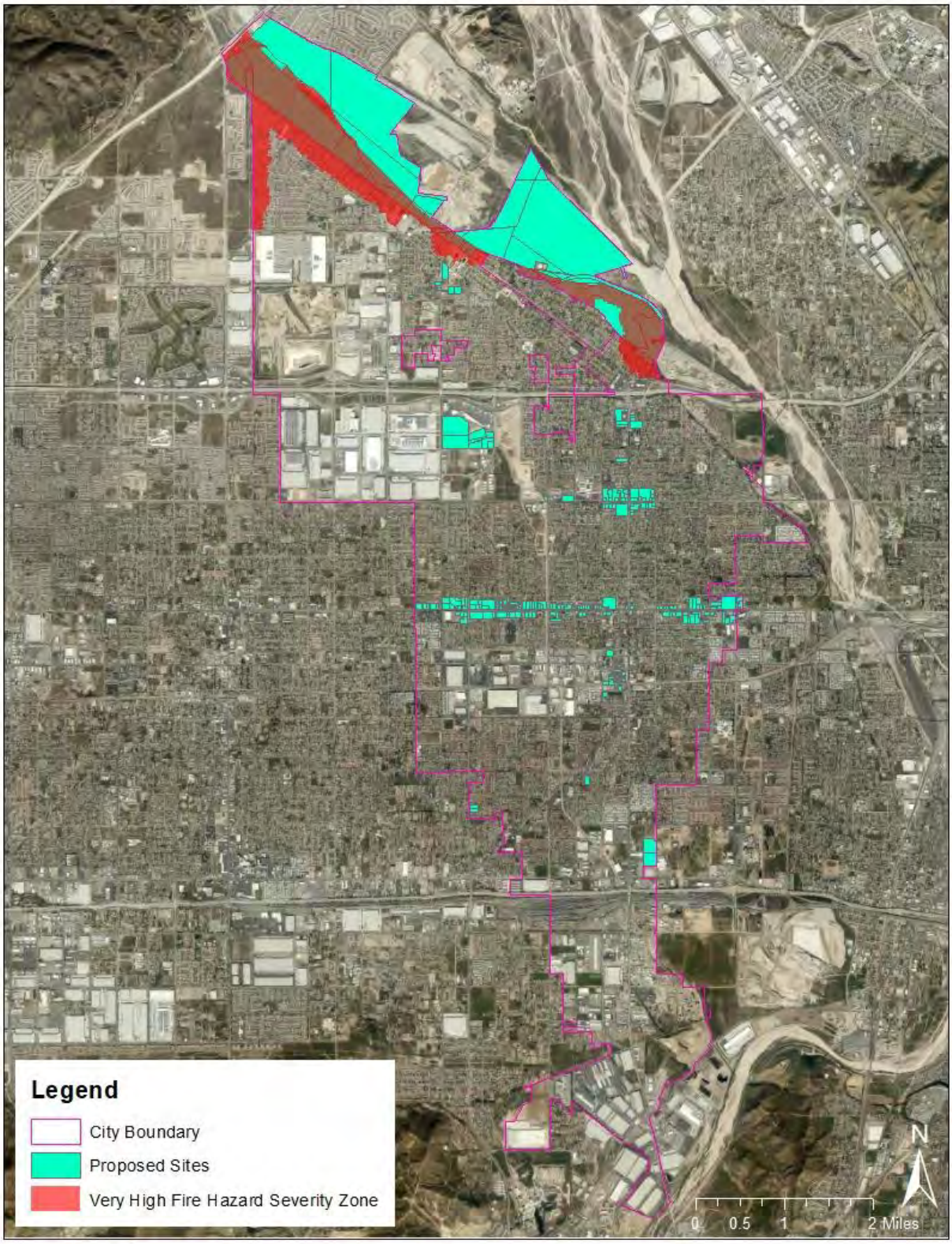
A wildland fire is an uncontrolled fire spreading through vegetative fuels that may expose or consume structures. Wildland fire hazards are of concern where development is adjacent to wildland areas, particularly in north Rialto. Fires starting in the foothill areas can easily spread south and consume urban development, especially if pushed by the Santa Ana winds that blow from the Cajon Pass. The threat of a wildland fire in or near Rialto is high due to the wildland urban areas in and around the City, where structures and other human development meet or intermingle with wildland or vegetative fuels. The threat of wildfire is particularly significant during dry summer months.

Urban Fires

Structural fires, although less than one percent of the incidents that the Fire Department responds to on an annual basis, account for 55 to 60 percentage of the yearly property losses in Rialto. To reduce these losses, the City requires development to include fire protection methods in building design. For example, structures exceeding 5,000 square feet must have fire and life safety systems in place, including automatic fire sprinklers and smoke detectors. In newer structures, these safety requirements help confine structural fires to the building or property of origin. In the older areas of Rialto, where building materials may not be fire rated and structures are not fitted with fire sprinklers, the probability of structural fires spreading to adjacent buildings is much higher. Structural fires are of particular concern in high-density areas, where the potential for fire to spread from one building to the next is greater. Additionally, Rialto's commercial and industrial districts have many uses with a high potential for chemical fires, which could impact nearby residential areas.

Figure 3-4 maps the fire hazard severity zones identified within the City in relation to the proposed sites for future housing. Based on the map, the majority of the proposed sites are located outside of the fire hazard severity zone. However, there are 36 housing sites partially located within the very high fire hazard severity zone. All of these sites are a part of the Lytle Creek Ranch Specific Plan which has previously gone through environmental evaluation and are approved for housing development. The Lytle Creek Ranch Specific Plan area is located adjacent to existing residential developments and as the surrounding area continues to be developed the risk of wildfire and fire severity will decrease. Additionally, the City's emergency response services can accommodate the planned increase in dwelling unit capacity. Therefore, fire hazards are not considered a major constraint on the development of housing.

Figure 3-4: Fire Hazard Severity Zones and Proposed Sites



Source: VHFHSV in LRA, Cal Fire, October 2008.

C. Affirmatively Furthering Fair Housing (AFFH)

Beginning January 1, 2019, AB 686 established new requirements for all California jurisdictions to ensure that local laws, programs, and activities affirmatively further fair housing. All Housing Elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. Under State law, affirmatively further fair housing means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics". These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The Analysis of Impediments (AI) to Fair Housing Choice, prepared for the City of Rialto for 2020-2024, examines local housing conditions, economics, policies, and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identified any existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

The City's AI is accompanied by the San Bernardino County Analysis of Impediments for 2020 – 2025. The Regional AI examines fair housing issues in the County's unincorporated areas and cooperating cities, it includes additional fair housing issues and data for the City of Rialto.

1. Needs Assessment

Existing Needs

As described in Section 3.F of this Housing Element, the Housing Authority of the County of San Bernardino (HACSB) administers Section 8 Housing Choice vouchers within the City of Rialto. For the year 2020, there were 355 Section 8 voucher holders within the community of Rialto. Additionally, the HACSB stated in its 2020 Annual Report that it has a 77,687-person waitlist to receive Section 8 Housing Choice vouchers across the County.

AI Outreach

The AI contains a Citywide analysis of demographics, housing, and specifically fair housing issued in the City of Rialto. The City demographic and income profile, household and housing characteristics, housing cost and availability, and special needs populations were discussed in the previous **Section 2: Community Profile**.

As part of the City's 2020-2024 AI, a community meeting was organized to solicit input and feedback. The community meeting focused around the investment of federal housing and community development

resources. The City outreached to public and private agencies as well as local individuals. The public had the opportunity to review the public review draft for 30 days prior to a public hearing before the City Council on May 12, 2020.

Housing Element Outreach

Additionally, as part of the 2021-2029 Housing Element Update, the City provided the following community engagement opportunities:

- Virtual community workshops in English and Spanish
- Self-guided workshops online and in-person at City Hall
- Tabling at community events to gather survey responses
- Online community surveys and feedback maps
- City-wide mailers
- Meetings with community stakeholders
- Outreach to property-owners
- Publicly available study sessions with the Planning Commission and City Council
- Webpage on the City's website with the Public Review Draft and information on the Housing Element Update process

The City made diligent efforts to inform and engage the community about the update process, as well as to gather insight into key housing challenges that exist in Rialto. In addition to the workshops, surveys, and the Public Review Draft, City Staff engaged local community organizations, affordable housing advocates, and housing developers to increase the feasibility of housing at all income ranges in the City.

Fair Housing Issues

Within the legal framework of federal and state laws and based on the guidance provided by the HUD Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

- Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

Local Contributing Factors

As a part of the City's 2020-2024 AI, the following issues and solutions were identified:

Transit Access

The City's transit provider, Omnitrans, has adopted service standards to provide equitable distribution of services throughout Rialto. These standards require all areas with a density of at least 3.5 dwelling/units per acre located on at least 25 acres to be provided with a transit service so that 90 percent of residences are within one half mile of bus stop.

Race/Ethnic Relations

The City of Rialto is made up of a very diverse population. Despite high levels of integration, according to the City's AI, hate crime complaints were submitted related to biases on race, ethnicity, and national origin.

The City's fair housing contractor, Inland Fair Housing and Mediation Board (IFHMB) provides a variety of educational workshops for tenants and landlords in the City. IFHMB will focus educational opportunities on race and ethnicity as a result of it being identified as an issue in the City of Rialto. In addition, the City's Human Relations Commission is working with IFHMB on a campaign to improve relationships between the City's different race/ethnic groups.

Discrimination against Persons with Disabilities

According to IFHMB and the City's AI, 48 percent of fair housing discrimination complaints filed in Rialto were on the basis of disability. The AI states that there has been an increase in complaints in Rialto and in the Region as disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications. This reportedly affects persons with cognitive disabilities.

It has been recommended that the IFHMB conduct fair housing workshops regarding the disabled and reasonable accommodations and modifications. Workshops will be held in the City of Rialto and the region.

Lending Patterns

Availability of financing affects a person's ability to purchase or improve a home. The analysis of the lending patterns and practices within a community or city help to identify persons who regularly experience disproportionate roadblocks to home ownership. **Table 3-16** below identifies the lending patterns by race and ethnicity, as well as income category for the Riverside San Bernardino Ontario Metropolitan Statistical Area (MSA). According to the data, applicants in the highest income category were more likely to have a loan approved, compared to applicants in the lowest income category where approval rates were consistently under 50 percent. Additionally, within each income category, applicants who identified as White consistently had higher rates of approval than other applicants who identified, for example, as Hispanic or Latino. Overall, applicants who identified as Native Hawaiian, Pacific Islander, and American Indian or Alaska Native had the lowest rates of loan approval in all income categories.

Table 3-16: Disposition of Loan Applications by Race/Ethnicity– Riverside San Bernardino Ontario MSA				
Applications by Race/Ethnicity	Approved (%)	Denied (%)	Other (%)	Total
LESS THAN 50% OF MSA/MD MEDIAN				
American Indian and Alaska Native	27.9%	36.4%	37.6%	258
Asian	40.0%	35.4%	27.7%	983
Black or African American	48.9%	22.6%	29.8%	1,295
Native Hawaiian or other Pacific Islander	26.9%	50.3%	24.2%	149
White	48.0%	25.4%	29.2%	12,112
Hispanic or Latino	44.1%	28.5%	29.7%	6,251
50-79% OF MSA/MD MEDIAN				
American Indian and Alaska Native	40.9%	36.4%	17.6%	352
Asian	47.0%	30.3%	27.2%	1521
Black or African American	43.8%	27.9%	32.3%	1529
Native Hawaiian or other Pacific Islander	34.7%	48.2%	20.2%	193
White	54.0%	21.7%	29.9%	19017
Hispanic or Latino	51.6%	25.1%	28.2%	11797
80-99% OF MSA/MD MEDIAN				
American Indian and Alaska Native	44.4%	29.9%	28.5%	144
Asian	50.2%	22.8%	31.7%	880
Black or African American	46.1%	24.7%	32.4%	777
Native Hawaiian or other Pacific Islander	56.9%	27.7%	20.0%	65
White	57.7%	17.9%	16.2%	9,073
Hispanic or Latino	56.0%	19.5%	28.9%	5,678
100-119% OF MSA/MD MEDIAN				
American Indian and Alaska Native	48.1%	23.9%	30.9%	401
Asian	59.2%	18.7%	27.9%	2,831
Black or African American	53.0%	21.0%	29.5%	2,347
Native Hawaiian or other Pacific Islander	45.2%	32.4%	24.3%	259
White	63.1%	14.6%	27.4%	27,369
Hispanic or Latino	60.8%	16.4%	27.0%	16,178
120% OR MORE OF MSA/MD MEDIAN				
American Indian and Alaska Native	51.5%	19.2%	32.8%	927
Asian	60.6%	15.9%	15.4%	12,219
Black or African American	55.0%	18.7%	29.9%	6,393
Native Hawaiian or other Pacific Islander	51.1%	23.1%	30.7%	620
White	65.5%	12.4%	27.9%	78,875
Hispanic or Latino	61.5%	15.5%	27.3%	30,093
Source: FFEIC (2019). Consumer Financial Protection Bureau, Disposition of applications by income, race, ethnicity of applicant, 2019. Retrieved from: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2019/CA/40140/5 (Accessed September 2020)				

Hate Crimes

Hate crimes are violent acts against people, property, or organizations because of the group to which they belong or identify with. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate, or act violently toward a person who has exercised their right to free housing choice.

Between 2015 and 2019, a total of five hate crimes were reported in the City of Rialto. The five hate crimes were related to race, ethnicity, and/or ancestry.

Table 3-17: City of Rialto, Reported Hate Crimes by Bias Motivation (2015-2019)							
Year	Race/ Ethnicity/ Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2015	1	0	0	0	0	0	1
2016	1	0	0	0	0	0	1
2017	1	0	0	0	0	0	1
2018	1	0	0	0	0	0	1
2019	1	0	0	0	0	0	1
Total	5	0	0	0	0	0	5
Source: Federal Bureau of Investigation (FBI), Uniform Crime Reporting. Hate Crime Statistics Report, 2014, 2015, 2016, 2017, 2018, and 2019.							

Fair Housing Enforcement and Outreach Capacity

The City of Rialto contracts with the IFHMB for services. The IFHMB is a nonprofit corporation founded in 1980 that serves the San Bernardino County and parts of Riverside and Imperial Counties. The IFHMB serves as an intermediary to assist individuals in resolving issues relating to housing discrimination, homeownership sustainability, rental complaints, and disputes in court through resource recommendations, education, and mediation. The organization assists thousands of individuals per year.

The IFHMB has capacity to use social media to raise awareness about fair housing and conduct fair housing education. This includes training workshops and presentations to provide information about fair housing laws and the services and resources available through the agency.

The City has not had and does not currently have any fair housing complaints, findings, lawsuits, or judgements related to enforcement actions. **Housing Program 5A** has been included in **Section 4: Housing Plan** to ensure compliance with Fair Housing Laws and Regulations and establish provisions to update the City's Municipal Code should it be necessary to maintain compliance.

Future Growth Needs

The City's future growth need is based on the RHNA production of 2,218 very low and 1,206 low-income units within the 2021-2029 planning period. **Appendix B** of this Housing Element shows the City's ability to meet its 2021-2029 RHNA need at all income levels. This demonstrates the City's ability to accommodate the anticipated future affordable housing needs of the community.

2. Integration and Segregation Patterns and Trends

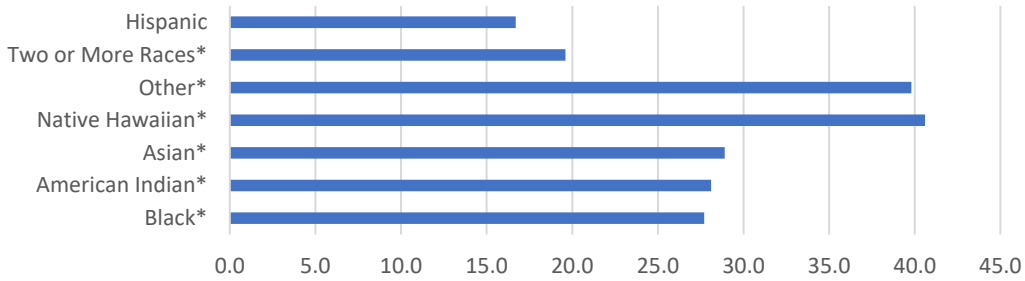
The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100 percent, indicating complete segregation. An index number above 60 is considered to show high similarity and a segregated community.

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some residents choosing to live

among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country.[3] Alternatively, when White residents leave neighborhoods that become more diverse, those neighborhoods can become segregated. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.

Figure 3-5 shows the dissimilarity between each of the identified race and ethnic groups and Rialto's White population. While all scores are less than 60, higher scores in **Figure 3-5** indicates higher levels of segregation with the White population.

Figure 3-5: Dissimilarity Index with the White Population in Rialto



	Black*	American Indian*	Asian*	Native Hawaiian*	Other*	Two or More Races*	Hispanic
Dissimilarity Index with White Population	27.7	28.1	28.9	40.6	39.8	19.6	16.7

*Non-Hispanic Only.

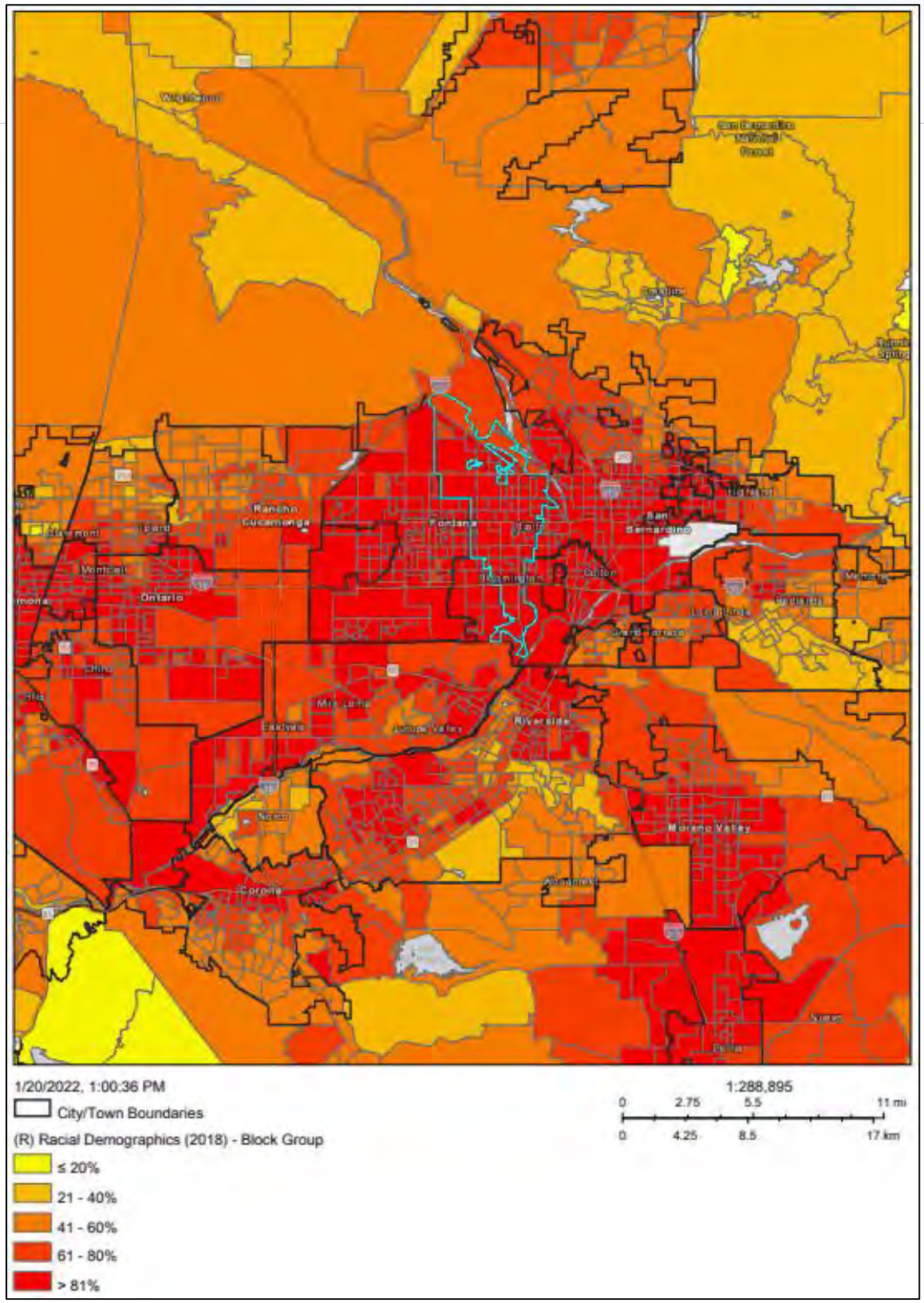
**When a group's population is less than 1,000 its dissimilarity index may be high even if the group's members are evenly distributed throughout the area.

Source: Census Scope, Social Science Data Analysis Network

Figure 3-6a shows 2018 racial demographics of the Rialto population in comparison to the surrounding region. As the figure shows, the City of Rialto population is completely made up of 81 percent or more persons who do not identify as White. This is consistent with the demographics of surrounding communities. In comparison, **Figure 3-6b** also shows racial demographics but for 2010. The figures show that over 8 years the City has increased its diversity and changed from a majority of its block groups reporting 41-60 percent Non-White population to all block groups reporting over 81 percent Non-White population. The trend is similar to the region where all block groups have increased in Non-White population, with some Cities such as Rialto experiencing much greater diversification.

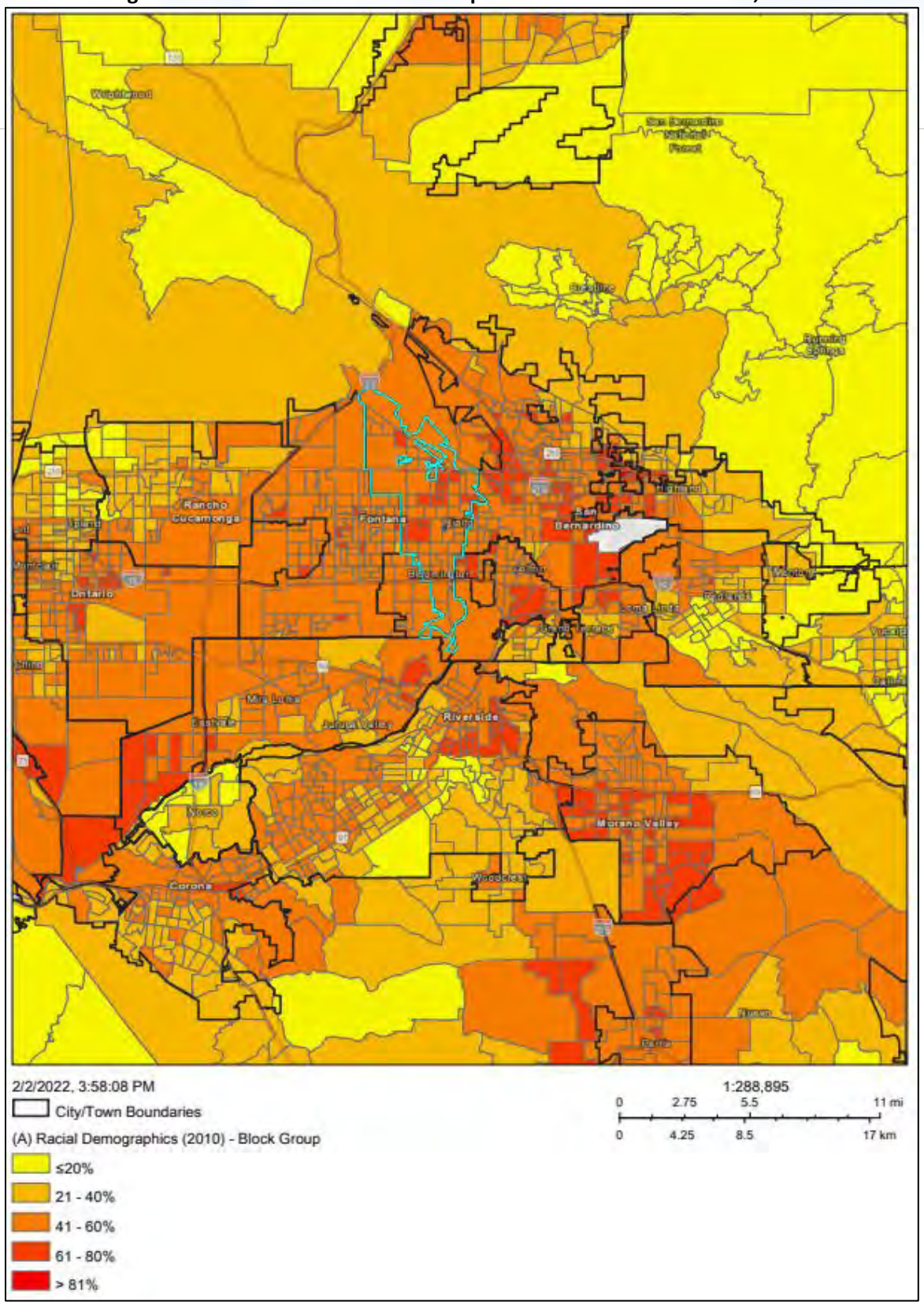
[3] Allen, James P. and Turner, Eugene. "Changing Faces, Changing Places: Mapping Southern California". California State University, Northridge, (2002).

Figure 3-6a: Percent of Non-White Population in and Around Rialto, 2018



Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-6b: Percent of Non-White Population in and Around Rialto, 2010



Source: California Department of Housing and Community Development – AFFH Data Viewer

The racial and ethnic groups in Rialto with the highest levels of segregation were Native Hawaiian (40.6 percent) and Other (39.8 percent). These scores correlate directly with the percentage of people within that racial or ethnic group that would need to move into a predominately White census tract in order to achieve a more integrated community. For instance, 40.6 percent of the Native Hawaiian population would need to move into a predominately White census tract areas to achieve "perfect" integration.

As indicated above, a score of 60 or higher indicates a segregated area. The City does not have any racial or ethnic groups with scores higher than 60.

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: RECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, neighborhoods of extreme poverty are census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a RECAP if the poverty rate within the neighborhood exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan area, whichever threshold is lower.

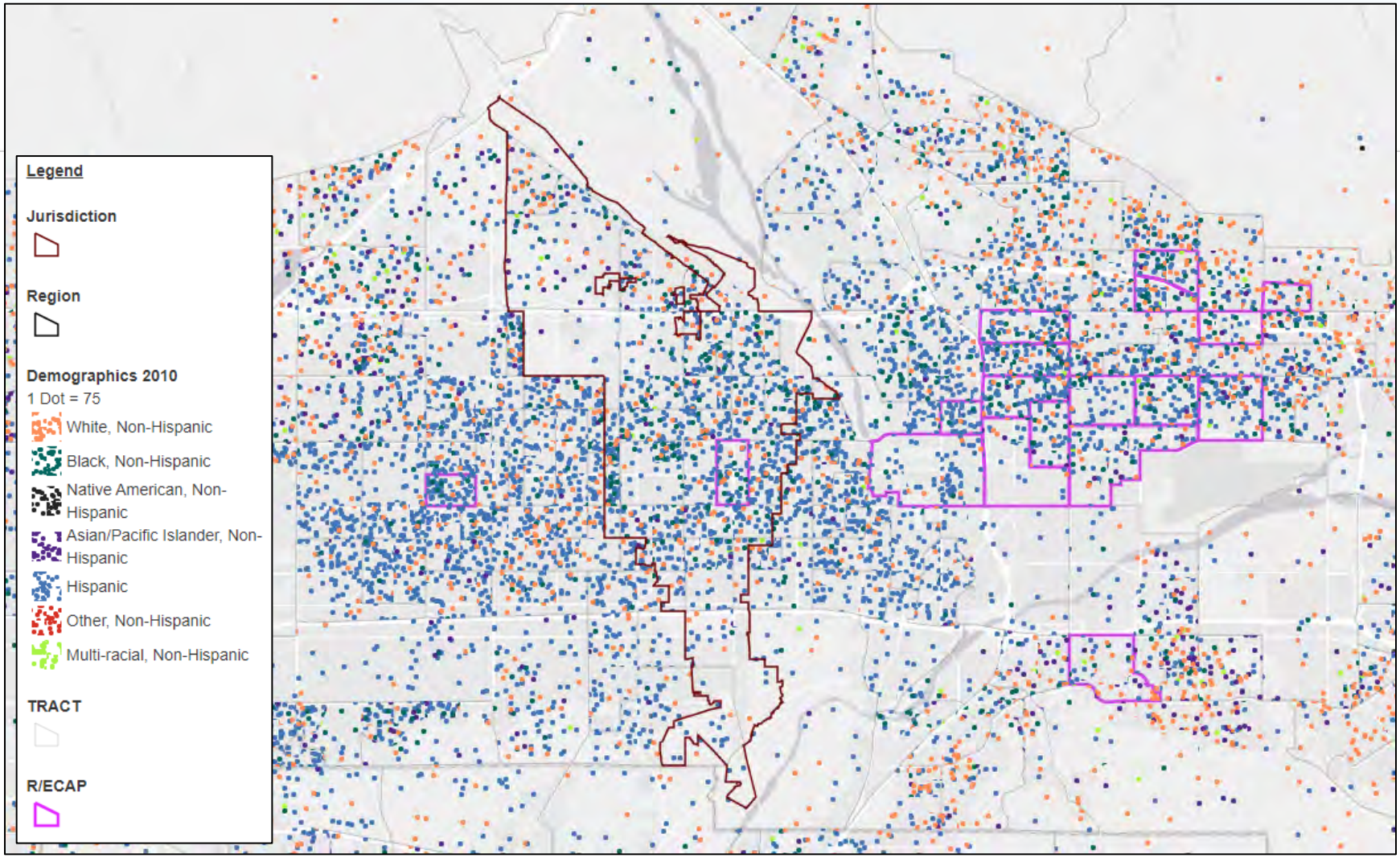
Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation[4]. However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or businesses, social networks, and communities to help immigrants preserve cultural identify and establish themselves in new places. Overall, it is important to study and identify these areas in order to understand patterns of segregation and poverty in a City.

Figure 3-7 below displays the R/ECAP analysis for the City of Rialto and surrounding area. The figure shows there is one racially or ethnically concentrated areas of poverty in the City's downtown area. Additionally, there are a number of racially or ethnically concentrated areas of poverty outside the City's limits. These are especially concentrated east of the City of Rialto.

The City of Rialto is committed to increasing housing mobility opportunities. **Section 4** of this Housing Element outlines housing opportunities, affordable housing, and fair housing strategies to increase opportunities to all households.

[4] Schulz, A. J., Williams, D. R., Israel, B. A., & Lempert, L. B. (2002). Racial and spatial relations as fundamental determinants of health in Detroit. *The Milbank quarterly*, *80*(4), 677–iv. https://doi.org/10.1111/1468-0009.00028

Figure 3-7: R/ECAP Areas, City of Rialto



Source: HUD Affirmitaevly Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006, June 8, 2021

Racially or Ethnically Concentrated Areas of Affluence (RCCA)

Racially or Ethnically Concentrated Areas of Poverty have long been analyzed and reviewed as a contributing factor to segregation. However, patterns of segregation in the United States show that of all racial groups, the White population is the most severely insulated (separated from other racial groups). Research also identifies segregation of affluence to be greater than the segregation of poverty. Racial and economic segregation can have significant effects on respective communities, including but not limited to, socioeconomic disparities, educational experiences and benefits, exposure to environmental conditions and crime, and access to public goods and services.

Data used in the analysis of Racially Concentrated Areas of Affluence (RCAA) is from the 2012-2016 American Community Survey and measured at the census track level. The definition for an RCAA is a census tract in which 80 percent or more of the population is White and has a median income of at least $125,000. The nationwide RCAA analysis identifies the following:

- RCAA tracts have more than twice the median household income of the average tract in their metro area.
- Poverty rates in RCAAs are significantly lower and are, on average about 20 percent of a typical tract.
- RCAAs tracts are more income homogenous than R/ECAPs.
- The average RCAA is about 57 percent affluent, whereas the average R/ECAP had a poverty rate of 48 percent.
- The typical RCAA tract has a rate of affluence 3.2 times that of a typical tract, whereas R/ECAPs on average had a poverty rate 3.2 times that of a typical tract.

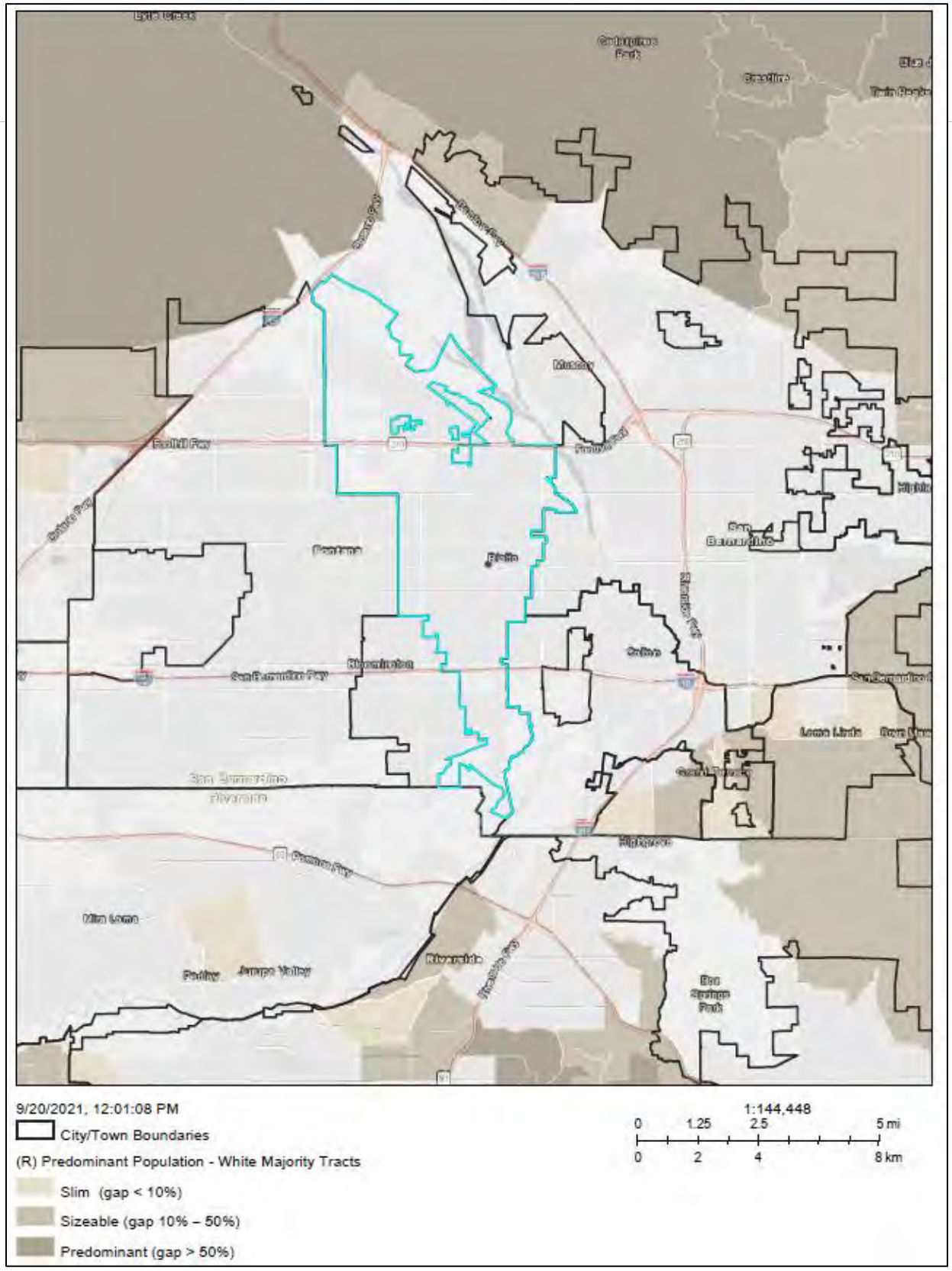
Overall, RCCAs may represent a public policy issue to the extent that they have been created and maintained through exclusionary and discriminatory land use and development practices. Postwar patterns of suburbanization in many metropolitan areas were characterized by White communities erecting barriers to affordable housing and engaging in racially exclusionary practices. **Figure 3-8** shows the City of Rialto does not have any census tracts with a White majority population. Additionally, **Figure 3-9** does not show any census tracts with a median income greater than $125,000. Therefore, the City of Rialto does not have any identified areas of affluence. **Figure 3-9** shows the majority of the City earns a median income greater than $87,100, but not greater than $125,000. Lower median incomes are predominantly located around the City's downtown area, while higher median incomes are located in the northern region of the City. The sites identified as part of the City's Appendix B: Adequate Sites Analysis are located all throughout Rialto to create new housing opportunities for all income groups across the City. **Table 3-18** shows local (Rialto) and regional (San Bernardino County) context for the median household income and White population.

Table 3-18: RCCAs - Median Household Income by Race, Rialto and San Bernardino County

Race	Rialto		San Bernardino County	
	Median Income	Population	Median Income	Population
White	$62,859[1]	62.9%	$64,416	61.2%
All Households	$61,518	--	$63,362	--

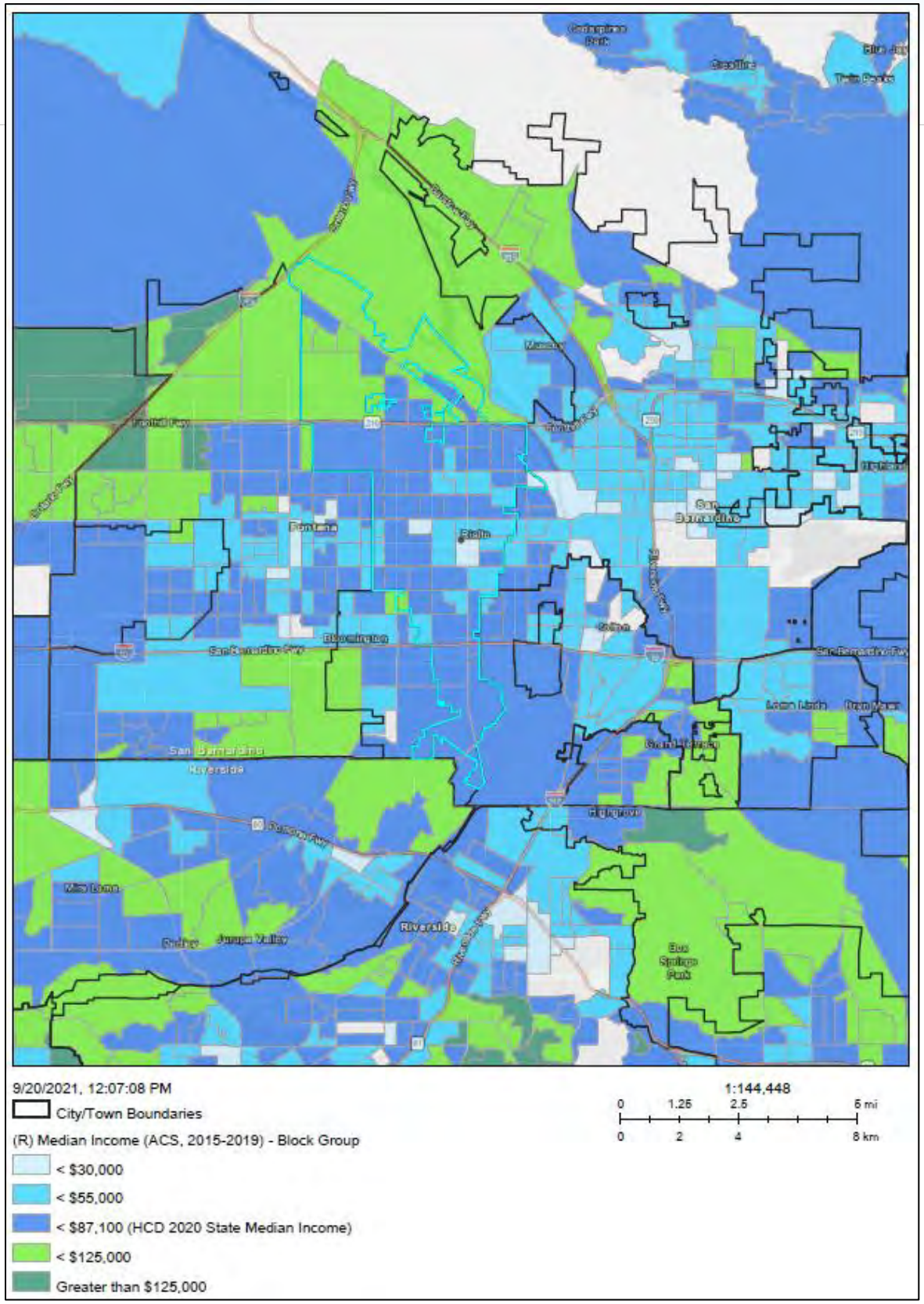
Source: American Community Survey, 5-Year Estimates, 2019.

Figure 3-8: RCAA – White Majority Population, Rialto



Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-9: RCAA – Median Income, Rialto



Source: California Department of Housing and Community Development – AFFH Data Viewer

3. Disparities in Access to Opportunity

Regional Opportunity Index (ROI)

The UC Davis Center for Regional Change and Rabobank partnered to develop the Regional Opportunity Index (ROI) intended to help communities understand local social and economic opportunities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The ROI incorporates both "people" and "place components, integrating economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity."

The **ROI: People** is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Education Opportunity:** Assesses people's relative success in gaining educational assets, in the form of a higher education, elementary school achievement, and regular elementary school attendance.
- **Economic Opportunity:** Measures the relative economic well-being of the people in a community, in the form of employment and income level.
- **Housing Opportunity:** Measures the relative residential stability of a community, in the form of homeownership and housing costs.
- **Mobility/Transportation Opportunity:** Contains indicators that assess a community's relative opportunities for overcoming rural isolation.
- **Health/Environment Opportunity**: Measures the relative health outcomes of the people within a community, in the form of infant and teen health and general health.
- **Civic Life Opportunity:** A relative social and political engagement of an area, in the form of households that speak English and voter turnout.

The **ROI: Place** is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

- **Education Opportunity:** Assesses a census tract's relative ability to provide educational opportunity, in the form of high-quality schools that meet the basic educational and social needs of the population.
- **Economic Opportunity**: Measures the relative economic climate of a community, in the form of access to employment and business climate.
- **Housing Opportunity:** Measures relative availability of housing in a community, in the form of housing sufficiency and housing affordability.
- **Health/Environment Opportunity:** A relative measure of how well communities meet the health needs of their constituents, in the form of access to health care and other health-related environments.
- **Civic Life Opportunity:** Measures the relative social and political stability of an area, in the form of neighborhood stability (living in same residence for one year) and US citizenship.

As **Figures 3-10** and **3-11** show below, the majority of the City of Rialto is classified as low to moderate opportunity. This indicates a low level of relative opportunities that residents achieve as well as low levels of relative opportunities that Rialto provides. While the majority of the census tracts within the City are areas of low to moderate opportunities, there is a census tract in the ROI People Index shown as green or high opportunity. **Figure 3-10** identifies the lowest and highest opportunity census

tracts showing that persons living within these two areas have low/high achievement opportunity for economic, health, and housing.

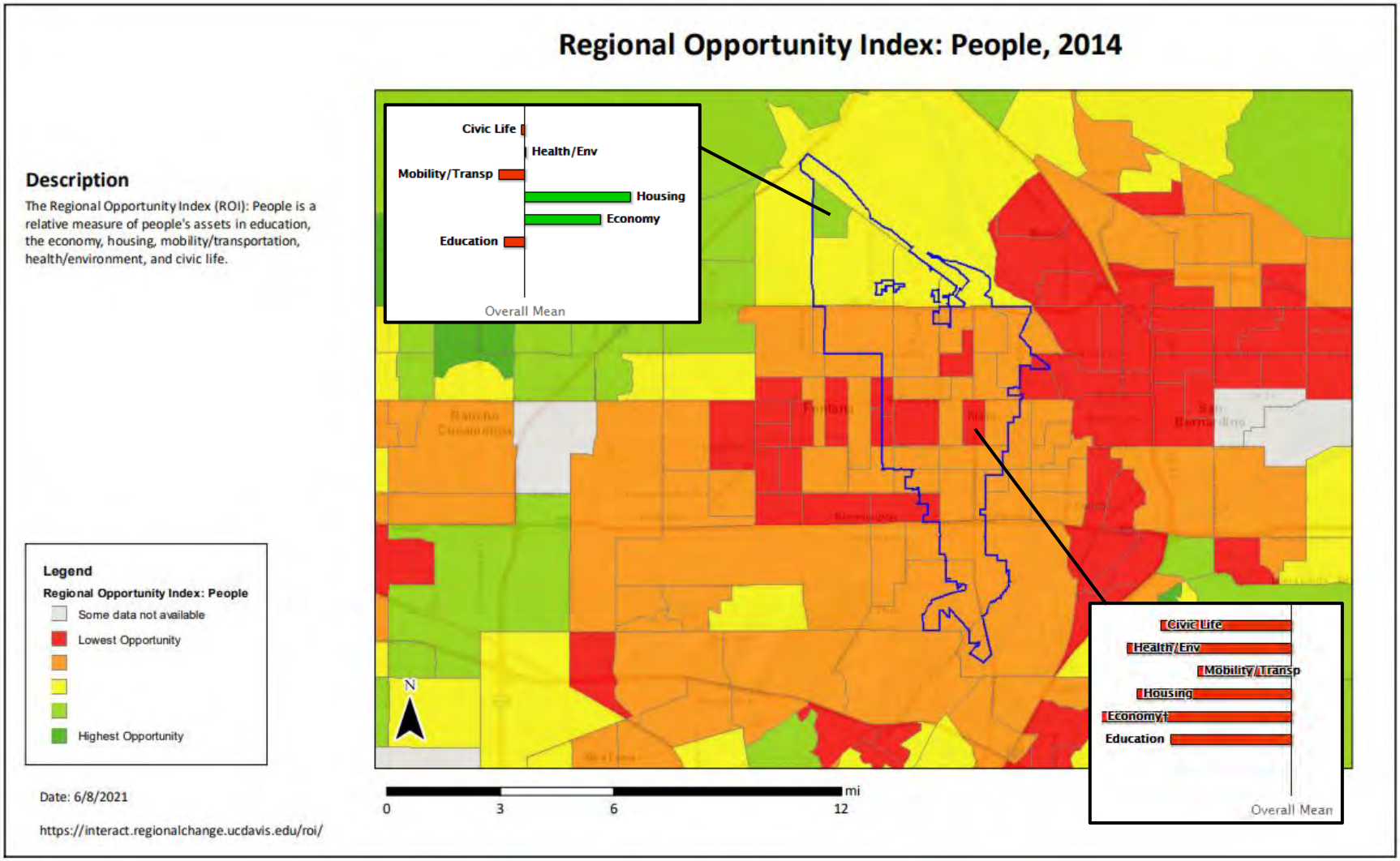
Overall, the City of Rialto is shown as low opportunity, this can be a result of a variety of factors including economy, mobility and/or housing. The Housing Element has identified areas within the City which can reasonably accommodate additional housing, specifically, housing which can be affordable to low and very low-income households. By increasing stable and affordable housing opportunity, the City hopes to increase opportunity for current and future residents of the City.

Figure 3-11 displays the opportunity that different census tracts can provide. The map also notes that majority of the City is classified as low opportunity. The southern region of the City has the highest-relative opportunity ratings – moderate opportunity. This provides a slightly higher level of opportunity than the rest of the City for civic life, health, and economic opportunity.

Additionally, **Table 3-19** and **Figure 3-12** below display the Regional Opportunity Index data for the City of Rialto and the State of California. The data shows the following key findings:

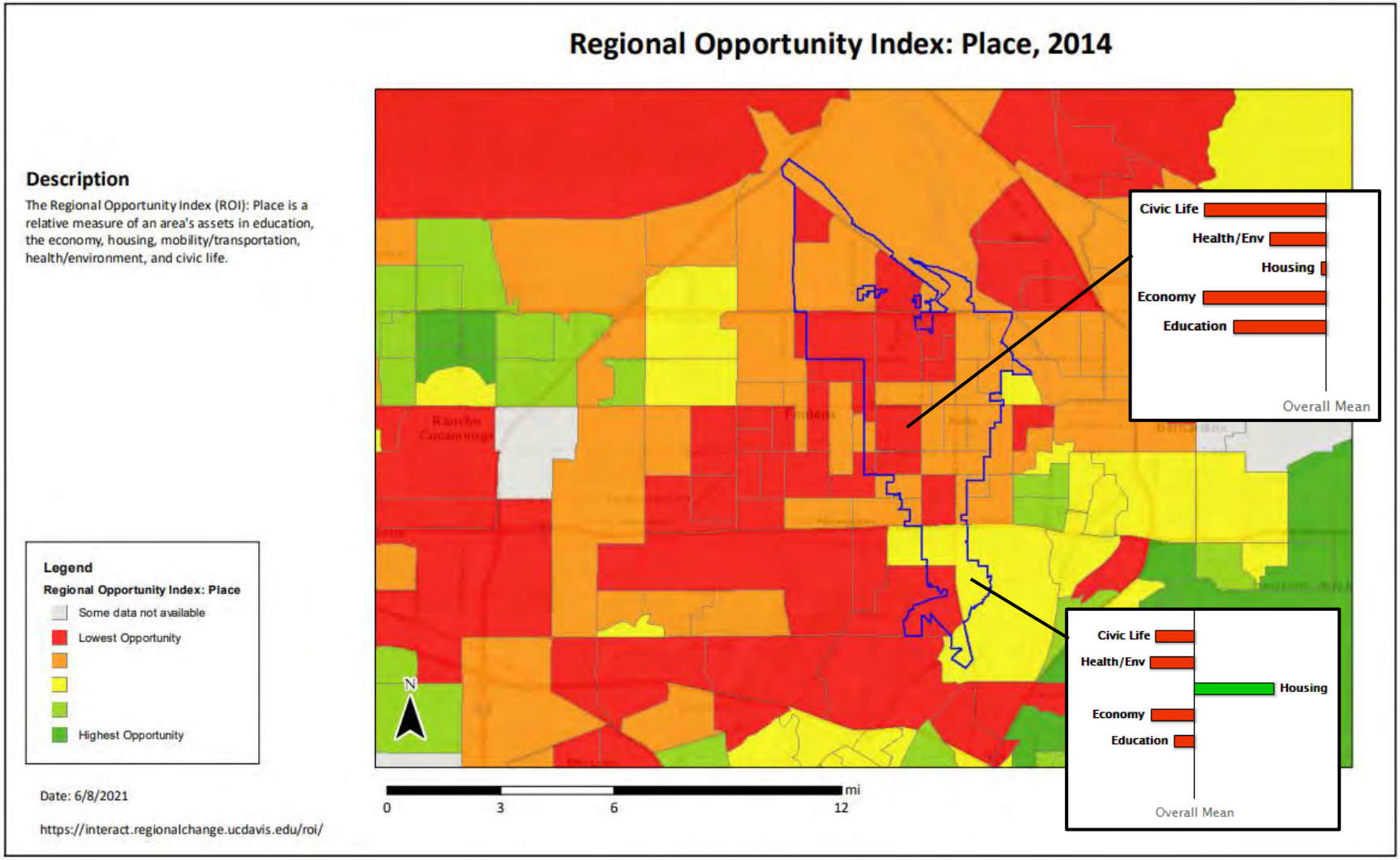
- Rialto residents reportedly have lower educational achievements and less access to educational resources. Despite teacher experience being higher than for the State, the elementary truancy and high school discipline rates are greater for the City and students have lower rates of UC/CSU eligibility.
- Rialto residents have lower employment rates and earn less than the State; however, the quality of jobs is greater and job growth is greater than for the State.
- Housing stock in Rialto is predominantly owner-occupied and has a higher level of affordability than the State.
- Rialto households have high access to vehicles and tend to have lower commute times than across the State.
- Environmental conditions are lower in Rialto than for the State. Infant health is a little lower in Rialto, but birth to teens and years of life lost are higher than for the State. The City has less access to health care and supermarkets.
- US citizenship and English speakers are lower in Rialto.
- In general, the City of Rialto is considered a low opportunity area. In selecting candidate housing sites, the City considers the need of existing residents to access education, employment, health care, and commercial necessities.

Figure 3-10: Regional Opportunity Index, People – City of Rialto



Source: UC Davis Center for Regional Change and Rabobank, 2014.

Figure 3-11: Regional Opportunity Index, Place – City of Rialto

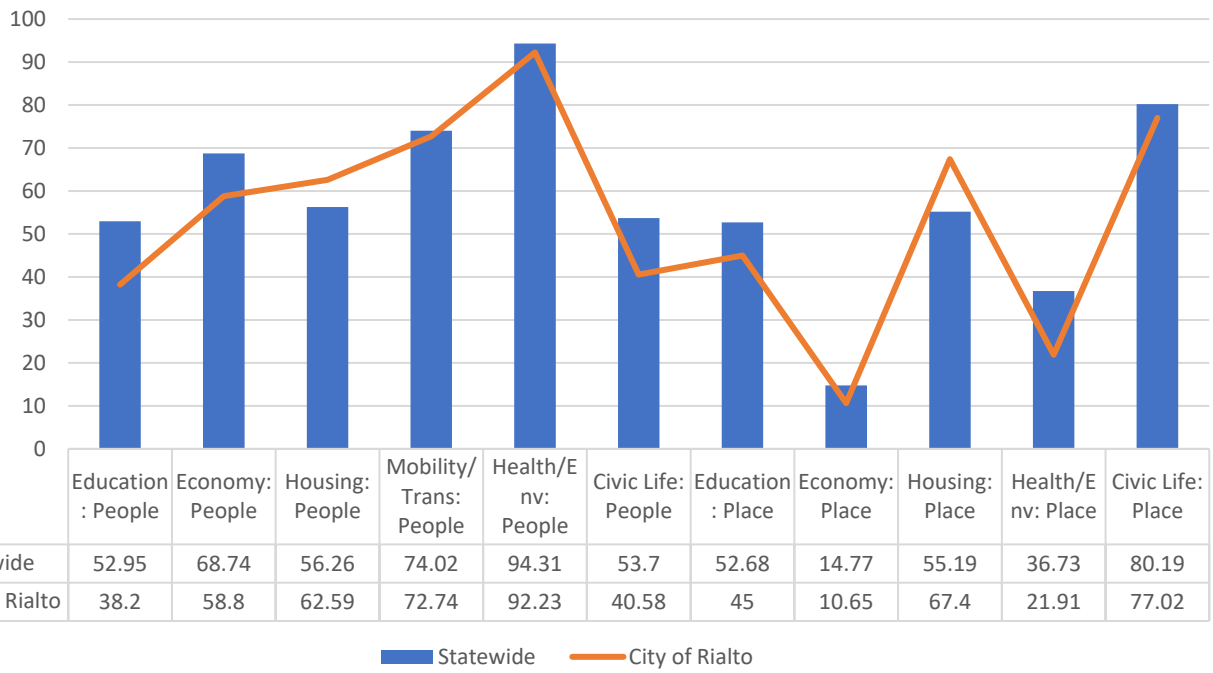


Source: UC Davis Center for Regional Change and Rabobank, 2014.

Table 3-19: Opportunity Indicators, Rialto and California			
	ROI Indicator	Rialto	California
Education	People		
	College Educated Adults	18%	38%
	Math Proficiency	64%	70%
	English Proficiency	56%	65%
	Elementary Truancy	34%	24%
	Place		
	High School Graduation Rate	81%	83%
	UC/CSU Eligibility	15%	41%
	Teacher Experience	56%	36%
	High School Discipline Rate	12%	6%
Economic	People		
	Employment Rate	85%	89%
	Minimum Basic Income	53%	64%
	Place		
	Job Availability	393.32	701.75
	Job Quality	41%	40%
	Job Growth	11%	3%
	Bank Accessibility	0.09	0.24
Housing	People		
	Home Ownership	67%	55%
	Housing Cost Burden	51%	52%
	Place		
	Housing Adequacy	85%	91%
	Housing Affordability	0.30	0.19
Mobility	People		
	Vehicle Availability	91%	86%
	Commute Time	54%	60%
	Internet Access	4.44	4
Health/Environmental	Place		
	Infant Health	94%	95%
	Birth to Teens	11%	7%
	Years of Life Lost	35.84	29.84
	Place		
	Air Quality	12.93	10.01
	Prenatal Care	84%	83%
	Access to Supermarket	44%	53%
	Health Care Availability	0.45	1.76
Civic Life	People		
	Voting Rates	19%	31%
	English Speakers	83%	88%
	Place		
	US Citizenship	77%	83%
	Neighborhood Stability	84%	85%

Source: UC Davis Center for Regional Change and Rabobank, 2014.

Figure 3-12: Regional Opportunity Indices, Rialto and California



	Education: People	Economy: People	Housing: People	Mobility/ Trans: People	Health/Env: People	Civic Life: People	Education: Place	Economy: Place	Housing: Place	Health/Env: Place	Civic Life: Place
Statewide	52.95	68.74	56.26	74.02	94.31	53.7	52.68	14.77	55.19	36.73	80.19
City of Rialto	38.2	58.8	62.59	72.74	92.23	40.58	45	10.65	67.4	21.91	77.02

Source: UC Davis Center for Regional Change and Rabobank, 2014.

As Rialto is considered a low opportunity region, the City is committed to implementing policies and programs to encourage new opportunities and access to existing and future residents. **Section 4: Housing Plan** identifies the strategies the City will explore in order to provide opportunity and housing for persons within the Rialto/San Bernardino County region.

Local Knowledge:

Disparities in access to opportunity is a complicated issue with many different factors. From City Staff's perspective:

- Lower educational achievement is likely associated with the high number of people for whom English is a second Language.
- With relatively low levels of college graduates, students in the school district have fewer role models or guides to help them prepare for a college education, which impacts eligibility to enter into UC/CSU colleges.
- Historically, the City has experienced limited private investment, which in turn, limits job availability, constrains bank, super market, and health care access.
- Environmental conditions are largely tied to manufacturing and warehousing uses with significant numbers of trucks generating emissions that affect air quality.

Opportunity Indicators

Opportunity indicators also help inform communities about disparities in access to opportunity. The Department of Housing and Urban Development (HUD) developed the opportunity indicators to help

inform communities about disparities in access to opportunity, the scores are based on nationally available data sources and assess resident's access to key opportunity assets in the City. **Table 3-20** provides the index scores (ranging from zero to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

Table 3-20 below displays the opportunity indices by race and ethnicity for persons living in Rialto. According to the data, there is poverty among all populations in Rialto, across all racial/ethnic groups. The highest levels of poverty are among persons identifying as Hispanic. All racial/ethnic groups in Rialto report low scores for school proficiency, labor market, low transportation cost, proximity to jobs, and environmental health.

Table 3-20: Opportunity Indicators, Rialto

(Rialto, CA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	44.76	31.21	20.73	60.50	44.50	28.32	24.98
Black, Non-Hispanic	40.88	28.99	19.69	60.34	45.64	23.87	25.23
Hispanic	34.83	25.79	16.97	63.06	48.09	23.49	23.14
Asian or Pacific Islander, Non-Hispanic	49.21	32.62	24.10	56.18	41.10	28.16	26.35
Native American, Non-Hispanic	37.42	27.74	16.68	62.83	47.42	24.22	22.52
Population Below Federal Poverty Line							
White, Non-Hispanic	35.96	29.19	18.61	64.37	48.58	27.68	23.96
Black, Non-Hispanic	28.23	24.95	15.32	62.57	48.80	20.58	25.65
Hispanic	24.32	21.85	13.76	65.49	52.47	20.34	22.39
Asian or Pacific Islander, Non-Hispanic	21.91	15.13	10.43	65.77	52.93	20.96	23.76
Native American, Non-Hispanic	18.33	27.71	6.53	69.17	54.10	18.96	19.79

Source: Department of Housing and Urban Development, Affirmatively Furthering Fair Housing Online Mapping tool, Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

TCAC/HCD Distribution of Private and Public Resources

Additionally, the Department of Housing and Community Development (HCD) together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task force developed the TCAC/HCD Opportunity Area Maps to understand how public and private resources are spatially distributed. The Task force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

According to the Task Force's methodology, the tool allocates the 20 percent of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20 percent to

the "High Resource" designation. Each region then ends up with 40 percent of its total tracts as "Highest" or "High" resource. These two categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice.

AREAS OF HIGH SEGREGATION AND POVERTY

As shown in **Figure 3-13** below the City of Rialto is classified as low to moderate resource areas. The TCAC/HCD Opportunity Map also identifies two census tracts reporting high segregation and poverty within Rialto. Census tract 35.10 and 37.00 are located in older central areas of the City where residential uses are a small component of the overall land use mix. Census tract 35.10 is located on the western side of the City and is largely made up of industrial and commercial uses with about a quarter of the area made up of a mixture of single-family and multi-family residential. The single-family residences in the tract were constructed in the mid-1900s. Census tract 37.00, or Downtown Rialto, is one of the oldest tracts in the City. It contains City Hall, downtown commercial uses, schools, a community center, industrial uses adjacent to the railroad, some multi-family residences, and a mixture of older single-family residences developed in the mid-1900s.

The following provides further analysis on the two areas' access to infrastructure, resources, and conditions:

- **Infrastructure** – The sidewalks, curbs, gutters, driveway approaches, alleys, pedestrian crossings and streetlights in the two areas of segregation and poverty are among the oldest infrastructure in the City and are in need of improvements. Both areas are within the City's water service area and have existing water infrastructure (water lines, valves, and fire hydrants) in all streets. These two areas have ample water sources and supplies, storage, and the required pressure for fire flow. The system has been maintained to achieve the required water quality and best management practices. Both areas are also within the City's sewer service area and have existing sewer infrastructure in all streets. There is plenty of capacity to add additional flows to the sewer collection system as may be necessary. Pavement condition in the two areas have various ratings similar to other areas of the City. In the western census blocks, many roads are ranked good with a few streets in the fair, poor, and very poor rankings. In the central area, pavement conditions are a blend of fair and poor with a few roadways that are good and a few roadways that are very poor.
- **Community Amenities** – In the central area of the City are multiple parks and open space amenities, including the Civic Center complex and Downtown Park. This area has better access to parks than other areas of the City. The western area of high segregation and poverty has fewer park and open space amenities. Nevertheless, access is similar to most neighborhoods in Rialto. Amenities include the Pacific Electric Trail, which offers connection to Bud Bender Park and the Carl Johns a short distance to the east of the neighborhood. Beyond parks and trails, there are a few public amenities in the two areas of high segregation and poverty. The central neighborhood has a resource center, a community center, Rialto City Hall, and the Metrolink Station. Community amenities in the western area are located interior to multifamily developments.
- **Safe Routes to School** – There are two schools located in the western area of high segregation – Rialto Middle School and Werner Elementary School. The City's Safe Routes to School Plan (SRTS

Plan) includes five street segments that serve both. Other schools in the city have similar routes planned. In the SRTS Plan both schools ranked 15 out of 29 schools in terms of prioritization of improvements.

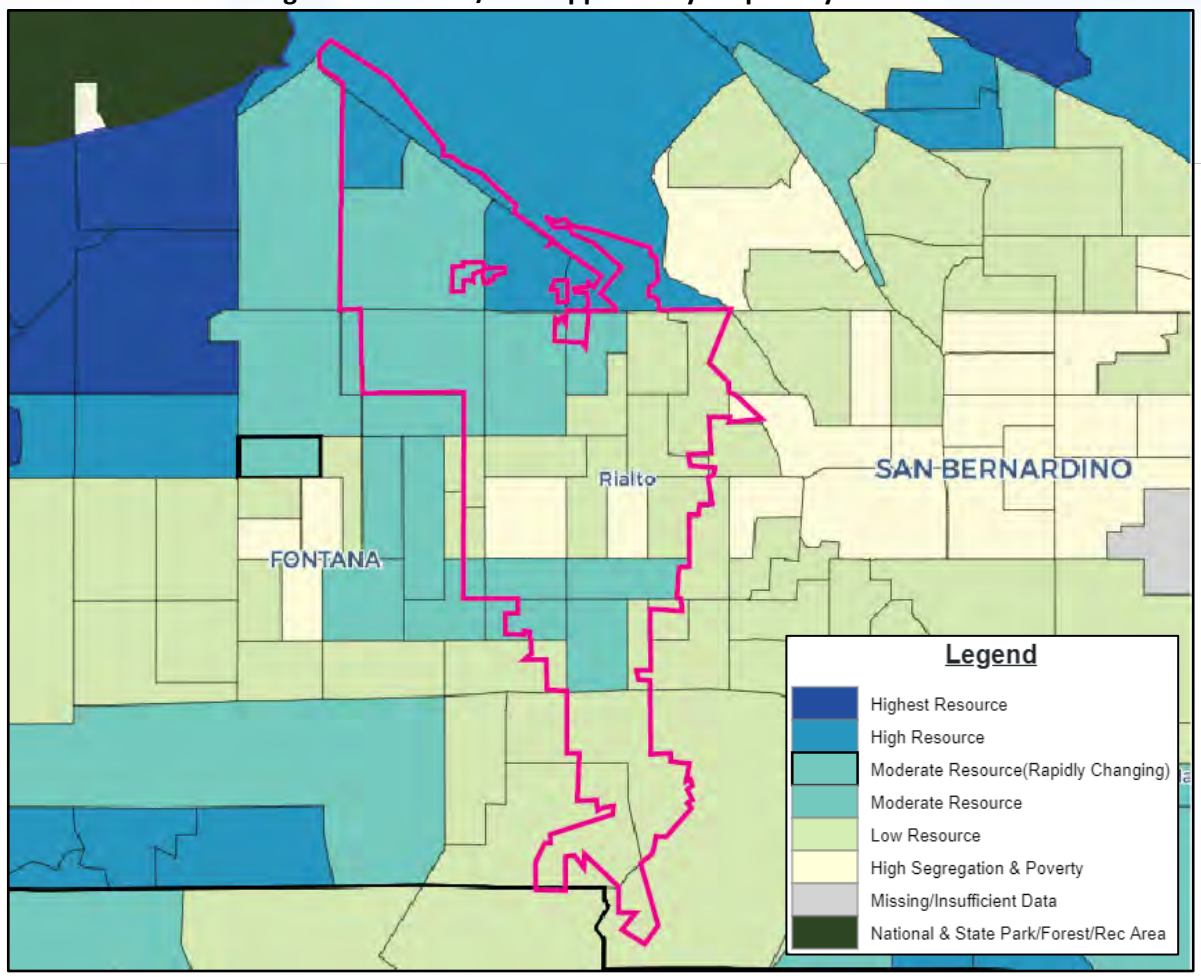
- **Environmental Health** – Census tract 35.10 reports a TCAC environmental domain score of 0.52 and a CalEnviroScreen 4.0 percentile score of 82.75 for environmental burdens. A truck route lines the western edge of the census tract, which may result in higher levels of air pollution. The street also has high traffic speeds. The area includes manufacturing uses, which offer jobs within a short distance. Two grocery stores are located less than a mile away. Shopping and services in the area include a Home Depot and the County of San Bernardino Transitional Assistance Department. Beyond these, there are limited opportunities for shopping and services in the area. Recreational opportunities are linked to public health and, as noted previously, include the Pacific Electric Trail, which passes through the area and Buck Bender Park, which is about a mile and a half away from the furthest residential portions of the area.

  Census tract 37.00 reports a TCAC environmental domain score of 0.54 and a CalEnviroScreen 4.0 percentile score of 96.08 for environmental burdens. Riverside Avenue runs through the middle of the census tract and is a high-volume street; there is also a railway that passes through the center, which may impact air quality. Services include the Rialto Resource Center, which provides a wide range of services including, but not limited to, career training and assistance with housing, food, water bills, gas and jobs. There are two grocery stores within a five-minute drive.
- **Past Policies and Efforts** – In the past, there have not been any policies or strategies specifically targeting these two areas of high segregation and poverty. The 2015-2019 Consolidated Plan listed past strategies that have addressed needs in these who census tracts, as well as in other disadvantaged areas of the City. However, no data is available to show how the programs have affected segregation and poverty since. Those programs included:
  - Community facilities and infrastructure improvements
  - Public services for low-income residents
  - Housing preservation
  - Fair housing services

  The 5th Cycle Housing Element included a number of programs that have assisted homeowners, including the following:
  - Emergency Home Repair (EHP): assisted two property owners
  - MAP: assisted two property owners
  - Home Sweet Home (HSH): assisted seven first-time homebuyers
  - Minor Rehabilitation Program (MRP): assisted three property owners

The City of Rialto is committed to exploring programs and avenues to increase housing access and opportunity to both existing residents, future residents, and households in nearby areas. Housing Program 5A includes specific actions and timelines to address the needs of high segregation and poverty neighborhoods.

Figure 3-13: TCAC/HCD Opportunity Map – City of Rialto



Source: California Tax Credit Allocation Committee and Department of Housing and Community Development, 2020

Opportunity Indicators – Education

The TCAC/HCD Opportunity Area Maps include education data, as illustrated in **Figure 3-14**. This data represents opportunity levels based on the following four factors:

- **Math proficiency** – Percentage of 4th graders who meet or exceed math proficiency standards.
- **Reading proficiency** – Percentage of 4th graders who meet or exceed literacy standards.
- **High school graduation rates** – Percentage of high school cohort that graduated on time.
- **Student poverty rate** – Percentage of students not receiving free or reduced-price lunch.

As **Figure 3-14** shows, the City is categorized as having lower opportunities for education. There are regions of higher opportunity to the north of the City, but most of the City is shown as having lower scores. This is similar to the opportunity scores of surrounding communities. **Figure 3-14** shows that while there are higher opportunity regions further to the west of the City, the San Bernardino region to the east of Rialto is mostly made up of lower scoring communities.

As part of the City's candidate sites analysis (**Appendix B**), sites have been identified equally throughout the City as a whole; there are no concentrations of lower income units identified. As such, the future development of affordable housing may occur in regions of the City providing various levels of opportunity for education. To provide improved opportunities for existing and future residents, the City has included Program 5A in **Section 4: Housing Plan**.

Opportunity Indicators – Economy

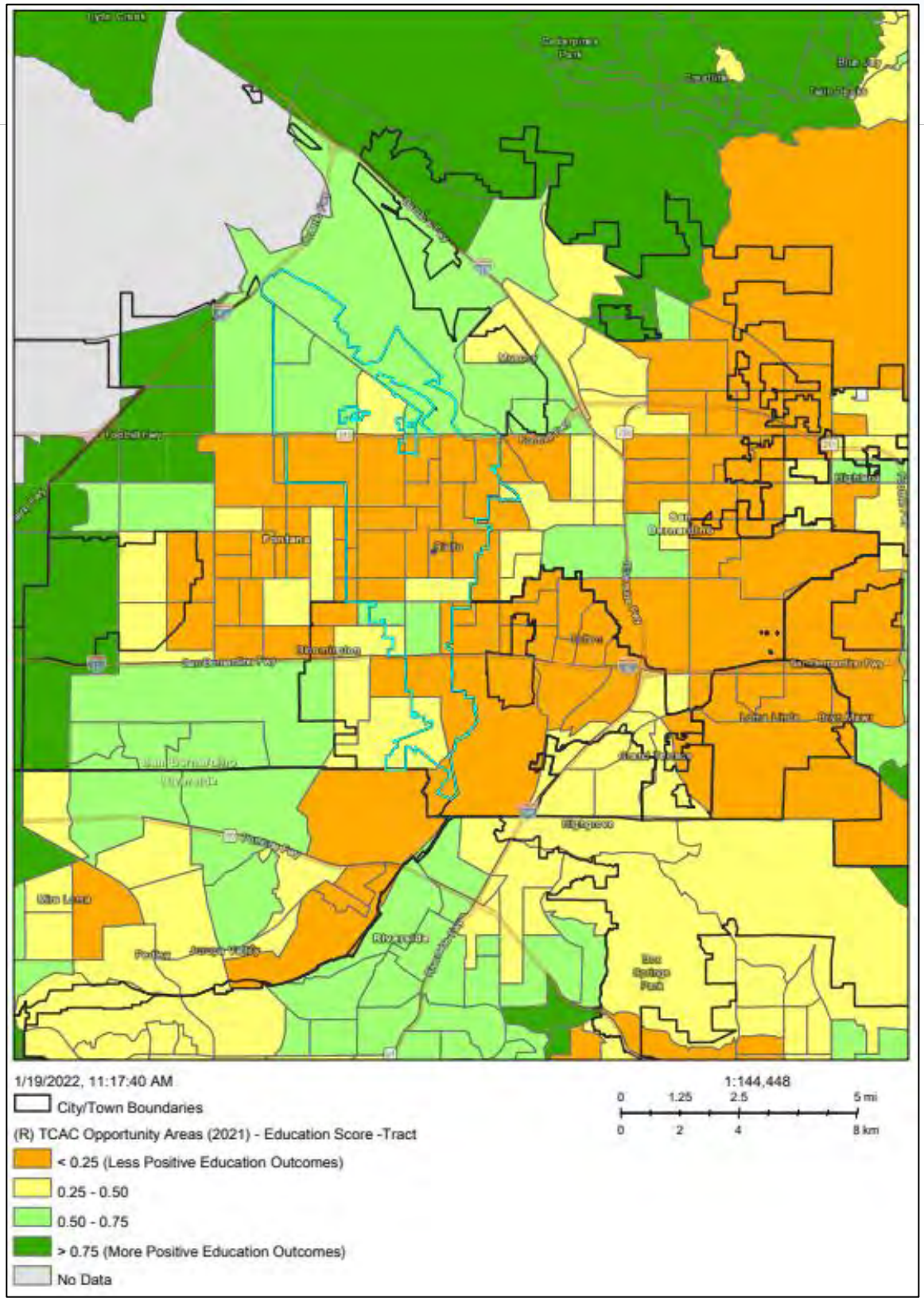
The TCAC/HCD Opportunity Area Maps include economic data, as illustrated in **Figure 3-15**. This data represents opportunity levels based on the following five factors:

- **Poverty** – Percent of population with income above 200% of federal poverty line.
- **Adult Education** – Percent of adults with a bachelor's degree or above.
- **Employment** – Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces.
- **Job Proximity** – Number of jobs filled by workers with less than a BA that fall within a given radius (determined by the typical commute distance of low-wage workers in each region) of each census tract population-weighted centroid.
- **Median Home Value** - Value of owner-occupied units.

As **Figure 3-15** shows, the City is generally made up of moderate economic opportunities. The City's central region is made up of low to moderate scores, but there are pockets of higher scores and large high-scoring regions to the north of the City. The City of Rialto fairly resembles the surrounding region in terms of opportunity levels. The neighboring City of Fontana is very similar to Rialto with lower opportunity scores towards the City's central region and higher scores in the northern and southern region. In contrast, the San Bernardino region is predominantly made up of very low scoring economic opportunities.

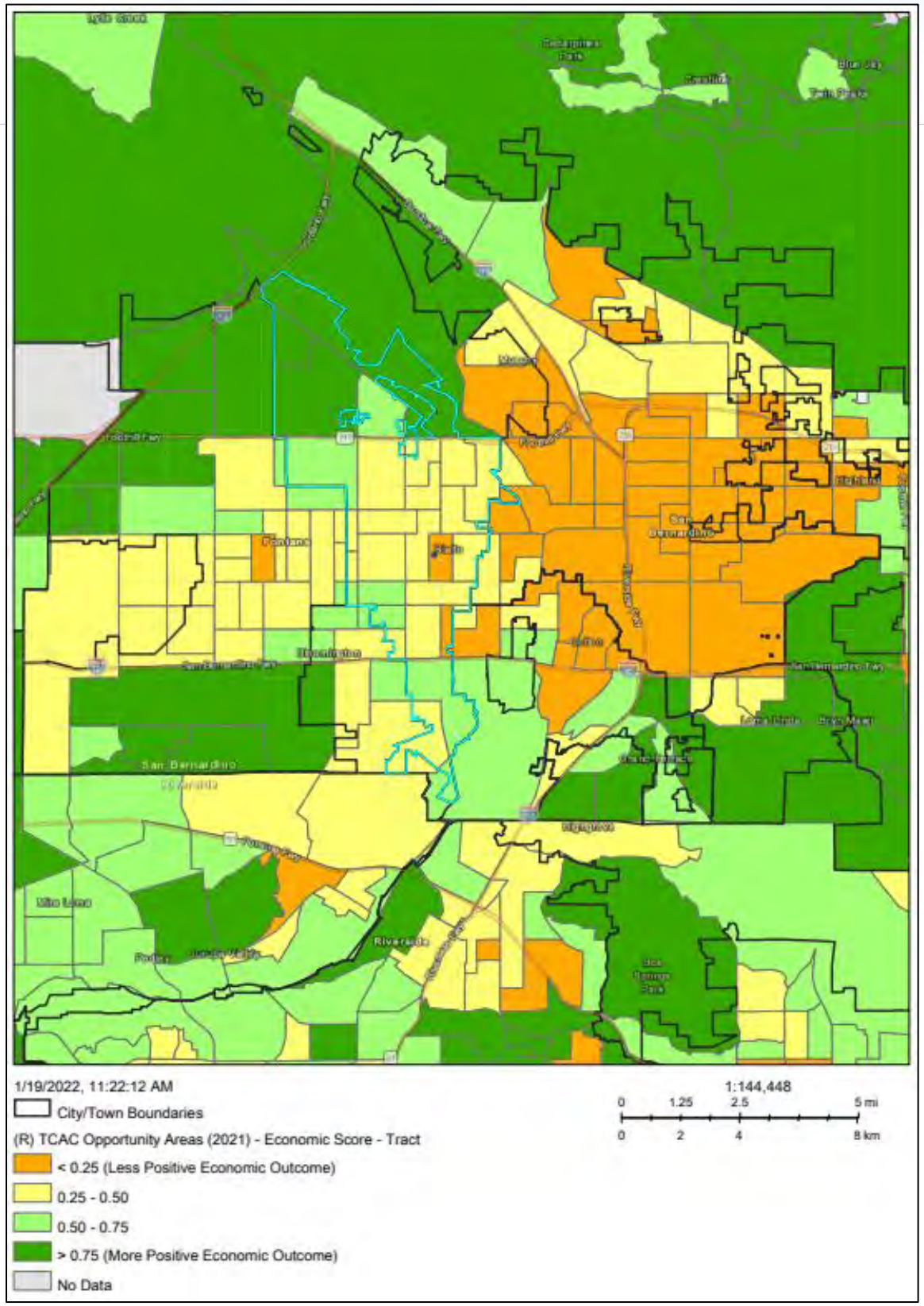
As part of the City's candidate sites analysis (**Appendix B**), sites have been identified equally throughout the City as a whole; there are no concentrations of lower income units identified. As such, the future development of affordable housing may occur in regions of the City providing various levels of opportunity for economic achievement. To provide improved opportunities for existing and future residents, the City has included Program 5A in **Section 4: Housing Plan**.

Figure 3-14: TCAC/HCD Opportunity Map – Education Score



Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-15: TCAC/HCD Opportunity Map – Economic Score



Source: California Department of Housing and Community Development – AFFH Data Viewer

Access to Transit

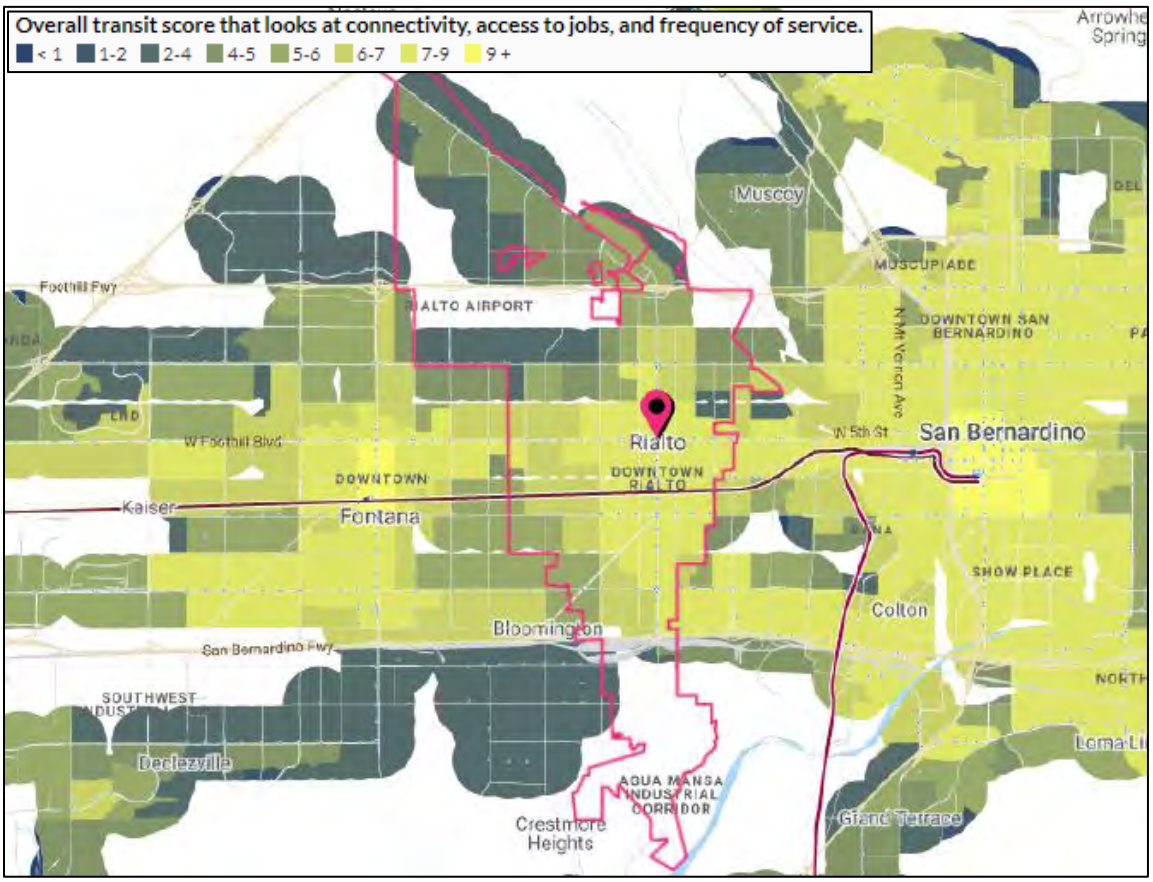
AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided in **Table 3-21**, Rialto scored a 6.0 AllTransit performance score, illustrating a moderate to high combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. By comparison, the cities of Fontana, Colton, and San Bernardino scored lower AllTransit scores. The city of San Bernardino is the only nearby city which scored higher than Rialto, with an AllTransit score of 6.7.

Table 3-21: Opportunity Indicator – Transit

Jurisdiction	AllTransit Performance Score	Transit Trips Per Week within 1/2 Mile	Jobs Accessible in 30-min trip	Commuters Who Use Transit	Transit Routes within 1/2 Mile
Fontana	5.5	1,592	46,136	1.99%	4
Rialto	**6.0**	**1,147**	**44,123**	**1.98%**	**2**
San Bernardino	6.7	2,483	74,028	2.38%	6
Colton	5.9	1,715	84,703	1.7%	3
San Bernardino County	4.4	1,098	44,660	1.57%	3

Source: All transit, American Community Survey 2019.

Figure 3-16: AllTransit Performance Score – City of Rialto



Source: AllTransit Metrics, ACS 2017.

Environmental Justice

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviro Screen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of certain ethnicities and lower socioeconomic status to environmental pollutants.

Figure 3-17 below displays mapped results of the CalEnviro Screen in Rialto and surrounding region. The map shows that all of the City is primarily high scoring. High scores signify high pollution burdens in the City. **Table 3-22** below identifies the census tract with the highest burden percentile and **Table 3-23** identifies the census tract with the lowest burden percentile; both census tracts are outlined in blue.

Table 3-22: CalEnviro Screen 3.0 – Census Tract 6071004004, Rialto

Pollutant	Percentile*		Health Risk/Burden	Percentile*
Ozone	100		Asthma	63
PM 2.5	78		Low Birth Weight	87
Diesel	98		Cardiovascular Rate	64
Pesticides	93		Education	85
Toxic Releases	67		Linguistic Isolation	68
Traffic	7		Poverty	79
Drinking Water	94		Unemployment	79
Cleanups	96		Housing Burden	17
Groundwater Threats	98			
Hazardous Waste	99			
Impaired Water	15			
Solid Waste	99			

*Percentile derived using a weighted scoring system to determine average pollution burden/ socioeconomic scores relative to other census tracts.

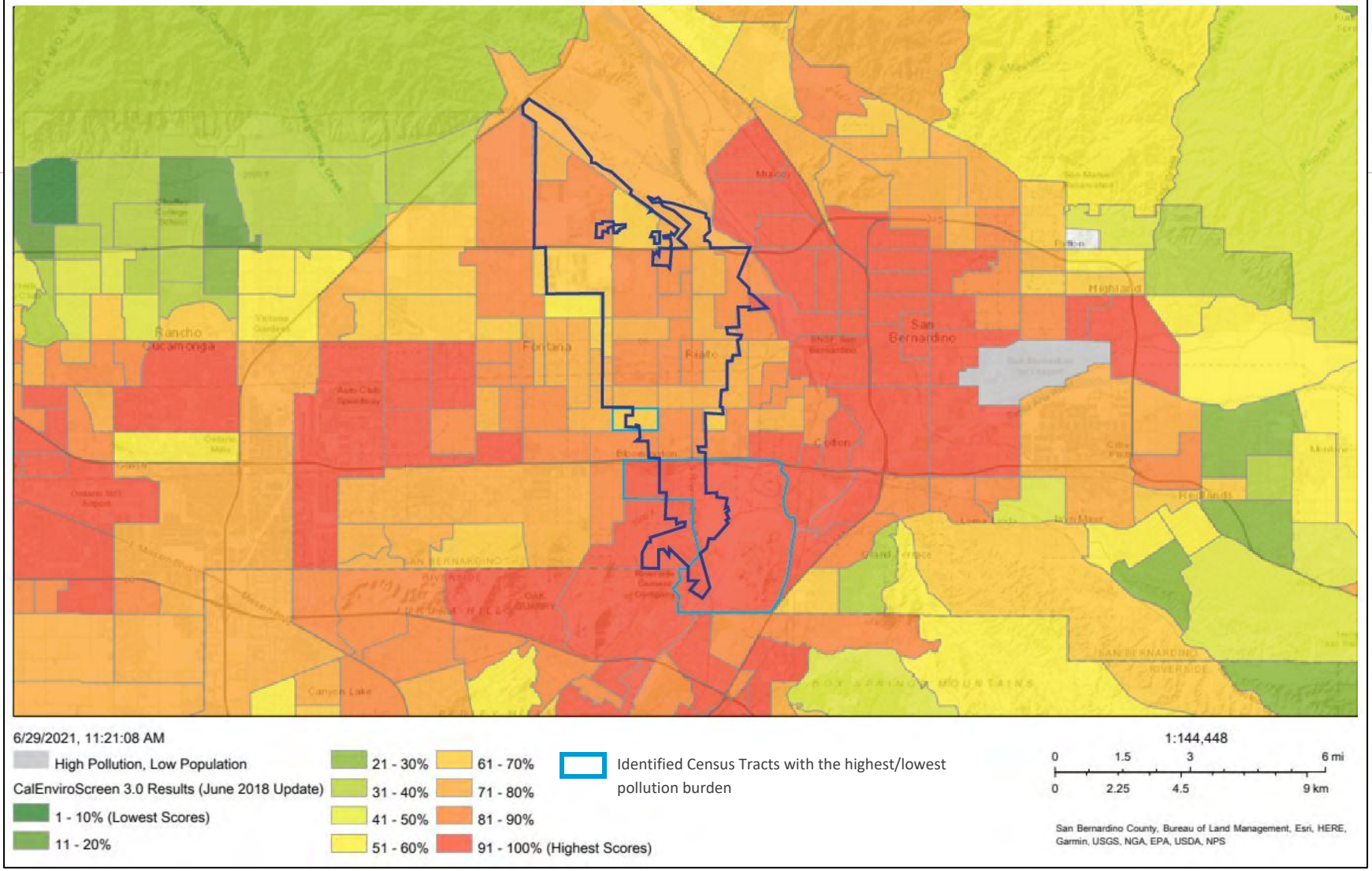
Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update. Accessed June 8, 2021.

Table 3-23: CalEnviro Screen 3.0 – Census Tract 6071003605, Rialto				
Pollutant	Percentile*		Health Risk/Burden	Percentile*
Ozone	98		Asthma	50
PM 2.5	93		Low Birth Weight	69
Diesel	77		Cardiovascular Rate	55
Pesticides	0		Education	72
Toxic Releases	70		Linguistic Isolation	64
Traffic	19		Poverty	70
Drinking Water	84		Unemployment	76
Cleanups	0		Housing Burden	71
Groundwater Threats	0			
Hazardous Waste	0			
Impaired Water	0			
Solid Waste	0			

*Percentile derived using a weighted scoring system to determine average pollution burden/ socioeconomic scores relative to other census tracts.

Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update. Accessed June 8, 2021.

Figure 3-17: CalEnviro Screen, City of Rialto Region



Source: CalEnviro Screen 3.0 Map Tool, June 2018. Accessed June 29, 2021.

4. Analysis of Federal, State, and Local Data and Knowledge

A variety of factors affect housing needs for different households. Most commonly, disability, household income and household characteristics shape the type and size of housing units needed, as well as accessibility based on existing units in a City. **Table 3-24** through **3-31** display data for demographic characteristics of Rialto, as compared to the County of San Bernardino and the State of California. A detailed analysis of the Rialto community demographics is outlined in **Section 2: Community Profile** of this Housing Element.

Table 3-24 displays the data for persons with disabilities in the City, County, and State. Overall, about 10 percent of the California population reports having at least one disability. Both the County and City have similar demographics with 11 percent and 9.5 percent reporting a disability, respectively. Of the Rialto residents who report a disability, those with an ambulatory disability represent the largest percentage. The County and State both also have the highest percentage of persons with ambulatory difficulties. Ease of reasonable accommodation procedures and opportunity for accessible housing can provide increased housing security for the population with disabilities.

Table 3-24: Population by Disability Type, Compared by Geography

Disability	City of Rialto	County of San Bernardino	State of California
Hearing Difficulty	1.9%	2.9%	2.9%
Vision Difficulty	1.8%	2.2%	2%
Cognitive Difficulty	4.3%	4.6%	4.3%
Ambulatory Difficulty	5.5%	6.3%	5.8%
Self-Care Difficulty	2.6%	2.6%	2.6%
Independent Living Difficulty	4.9%	5.7%	5.5%
Total with a Disability	9.5%	11%	10.6%

Source: American Community Survey, 5-Year Estimates, 2019.

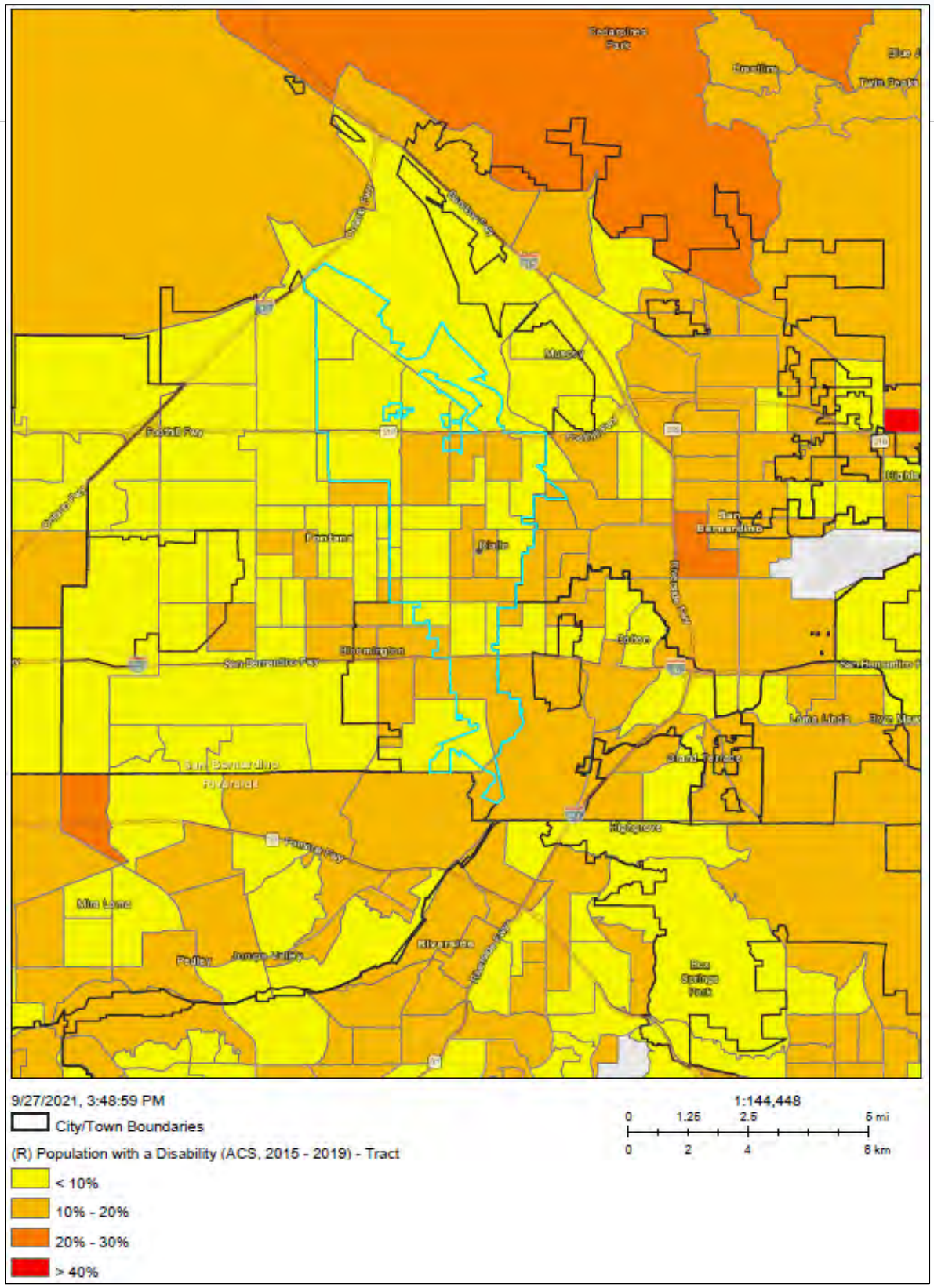
Figure 3-18a shows the 2019 population with at least one disability throughout the City and neighboring communities. As illustrated, the majority of the City has census tracts with less than 10 percent of the population reporting a disability. A few census tracts in the center of the city and in the southern region have higher percentages with up to 10 to 20 percent of the census tract population reporting a disability. Candidate sites have been identified in census tracts reporting larger populations of disabled individuals. The addition of affordable housing in these areas can be of benefit when paired with or located near commercial necessities and services.

In comparison, **Figure 3-18b** shows the 2014 population with at least one disability. More census tracts report populations with a disability between 10 to 20 percent compared to 2019. The two figures show that over five years the City has seen a decrease in population with a disability, thus decreasing specialized need across the City as a whole.

Public comments from the AI and Housing Element Update outreach indicates that discrimination based on disability is a primary concern. Organizational leaders identified education, counseling, anti-discrimination, and landlord-tenant mediation services as needed to advance fair housing goals.

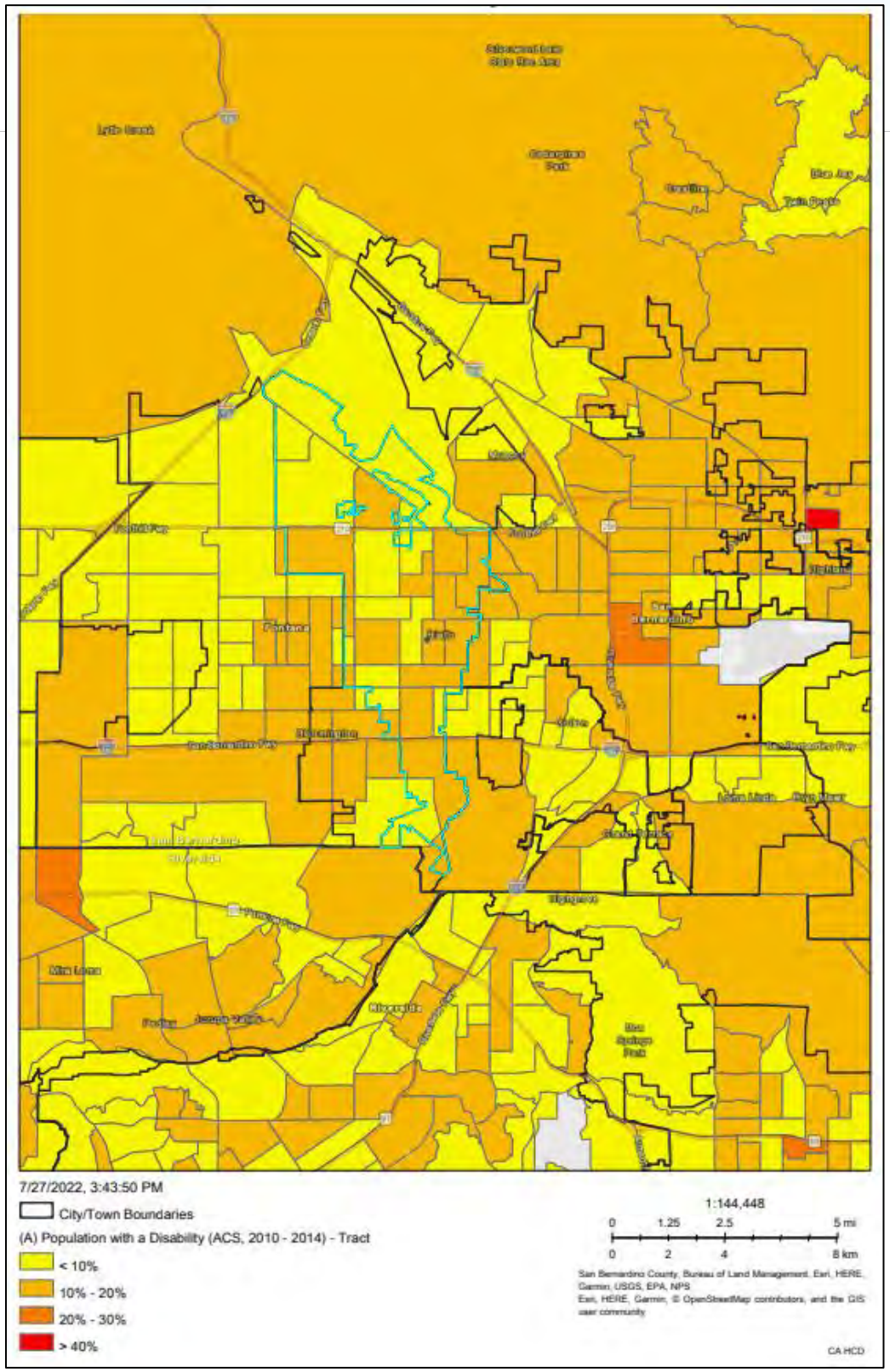
Participants mentioned that the undersupply and preservation of affordable housing was critical, particularly for those who are disabled and seniors. In addition to housing, members of the public have observed a high range of need for additional services such as those necessary for developmentally disabled adults. As it relates to transportation, **Figure 3-16** shows areas with higher percentages of persons with disabilities generally overlap with high scoring transit access.

Figure 3-18a: Rialto Population with a Disability (2019)



Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-18b: Rialto Population with a Disability (2014)



Source: California Department of Housing and Community Development – AFFH Data Viewer

Table 3-25 and **3-26** display household types and income data for the City, County, and State. Overall, the City has the largest percentage of family households compared to the County and the State; this includes family households and those with related children under the age of 18. Of the three jurisdictions, the State has the largest percentage of non-family households and households with at least one person over the age of 60.

Regarding household income, the City has a lower median household income compared to the County and the State. As **Table 3-26** shows, about half of Rialto's households earn incomes between $35,000 and $99,999. Households earning over $100,000 represent 24.5 percent in the City, 28.5 percent in the County, and 37.7 percent in the State.

Table 3-25: Population by Familial Status, Compared by Geography

Familial Status	City of Rialto	County of San Bernardino	State of California
Family Households	82.6%	76.5%	68.7%
Married-Couple Family Households	54%	52.1%	49.8%
With Related Children <18 Years	50.8%	41.4%	34%
Non-Family Households	17.4%	23.5%	31.3%
Households with One or More People 65 Years+	36.4%	37.2%	39.1%
Total Households	**26,033**	**636,041**	**13,044,266**

Source: American Community Survey, 5-Year Estimates, 2019.

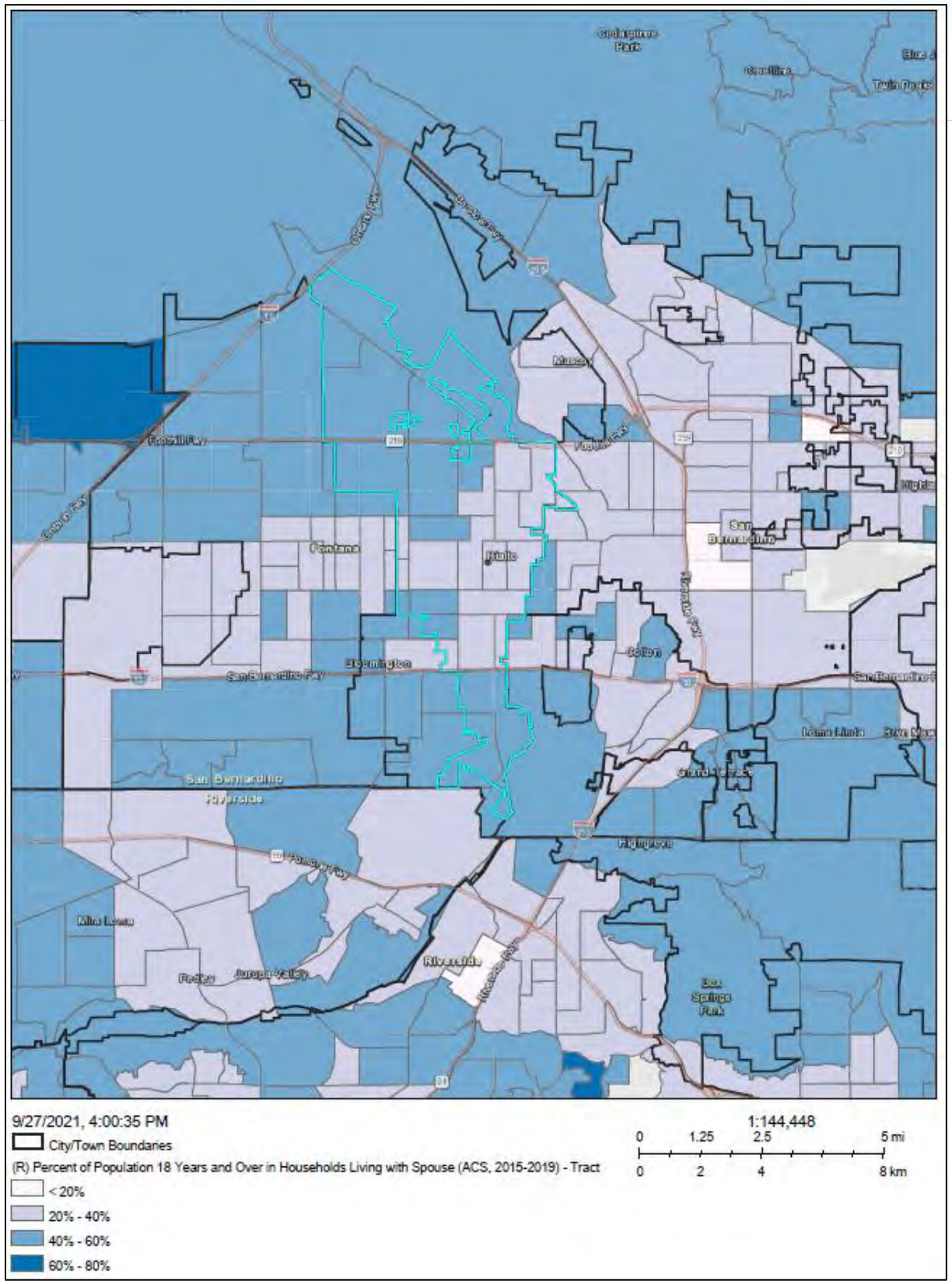
Table 3-26: Household by Income, Compared by Geography

Household Income	City of Rialto	County of San Bernardino	State of California
Less than $10,000	3.9%	5.0%	4.8%
$10,000-$14,999	3.9%	4.6%	4.1%
$15,000-$24,999	9.4%	8.6%	7.5%
$25,000-$34,999	8.9%	9.1%	7.5%
$35,000-$49,999	12.9%	12.2%	10.5%
$50,000-$74,999	21.0%	18.1%	15.5%
$75,000-$99,999	15.5%	13.9%	12.4%
$100,000-$149,999	15.8%	16.0%	16.6%
$150,000-$199,999	6.2%	7.1%	8.9%
$200,000 or More	2.5%	5.4%	12.2%
Median Income	**$61,518**	**$63,362**	**$75,235**

Source: American Community Survey, 5-Year Estimates, 2019.

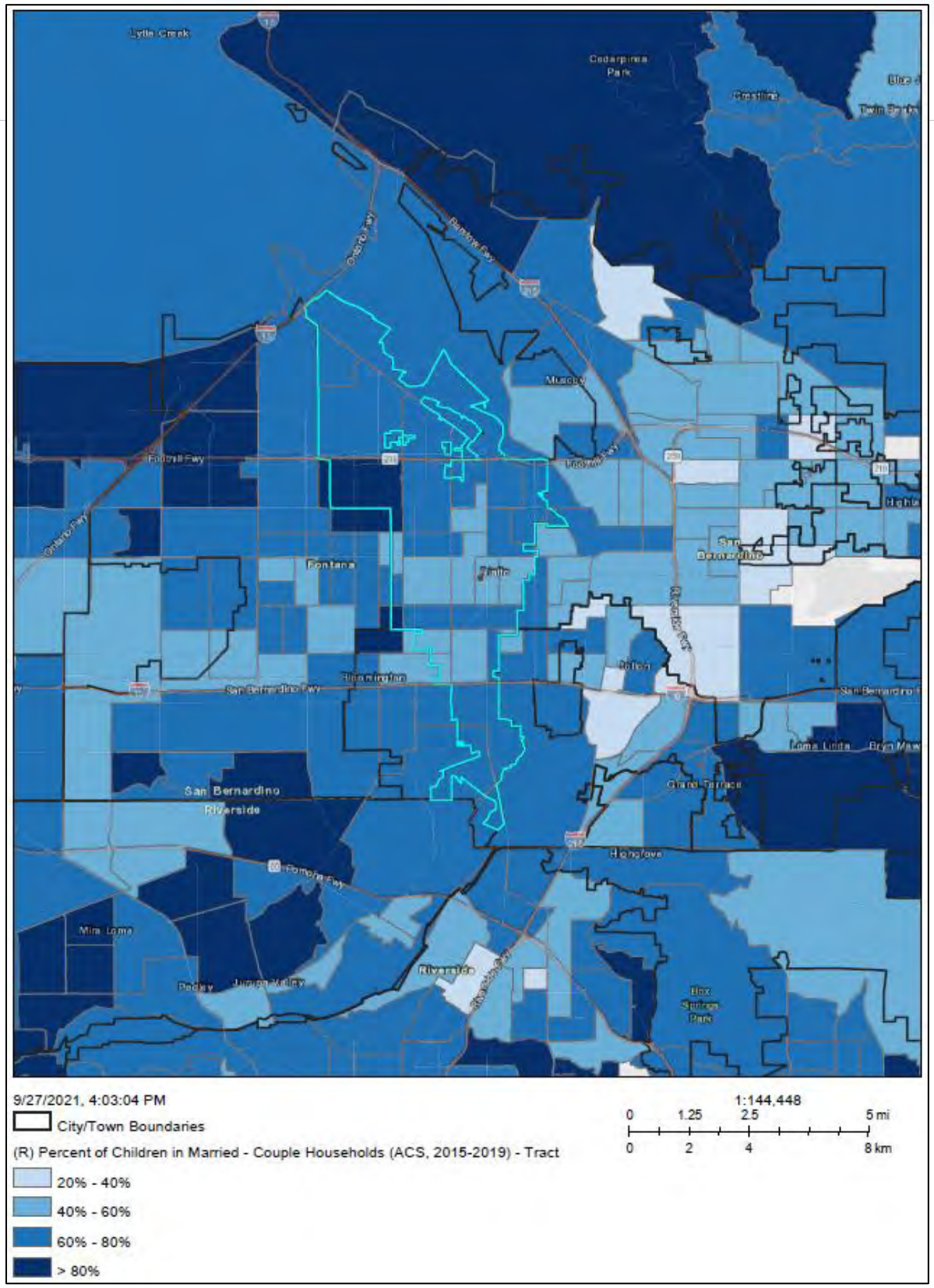
Figure 3-19 below shows the propensity of married-couple households throughout the City. As illustrated, the northern and southern regions of the City have a near majority representation of married-couple households, while the region around Rialto's downtown reports 20 to 40 percent. The data is similar for children living in married-couple house, as shown in **Figure 3-20**. **Figure 3-21** shows higher percentages of children living in female-headed households towards the center of the City, with one census tract reporting 40 to 60 percent of children living in female-headed households. The City of Rialto has very low percentages of persons living alone; all census tracts report less than 20 percent persons living alone (**Figure 3-22**).

Figure 3-19: Married-Couple Households, Rialto



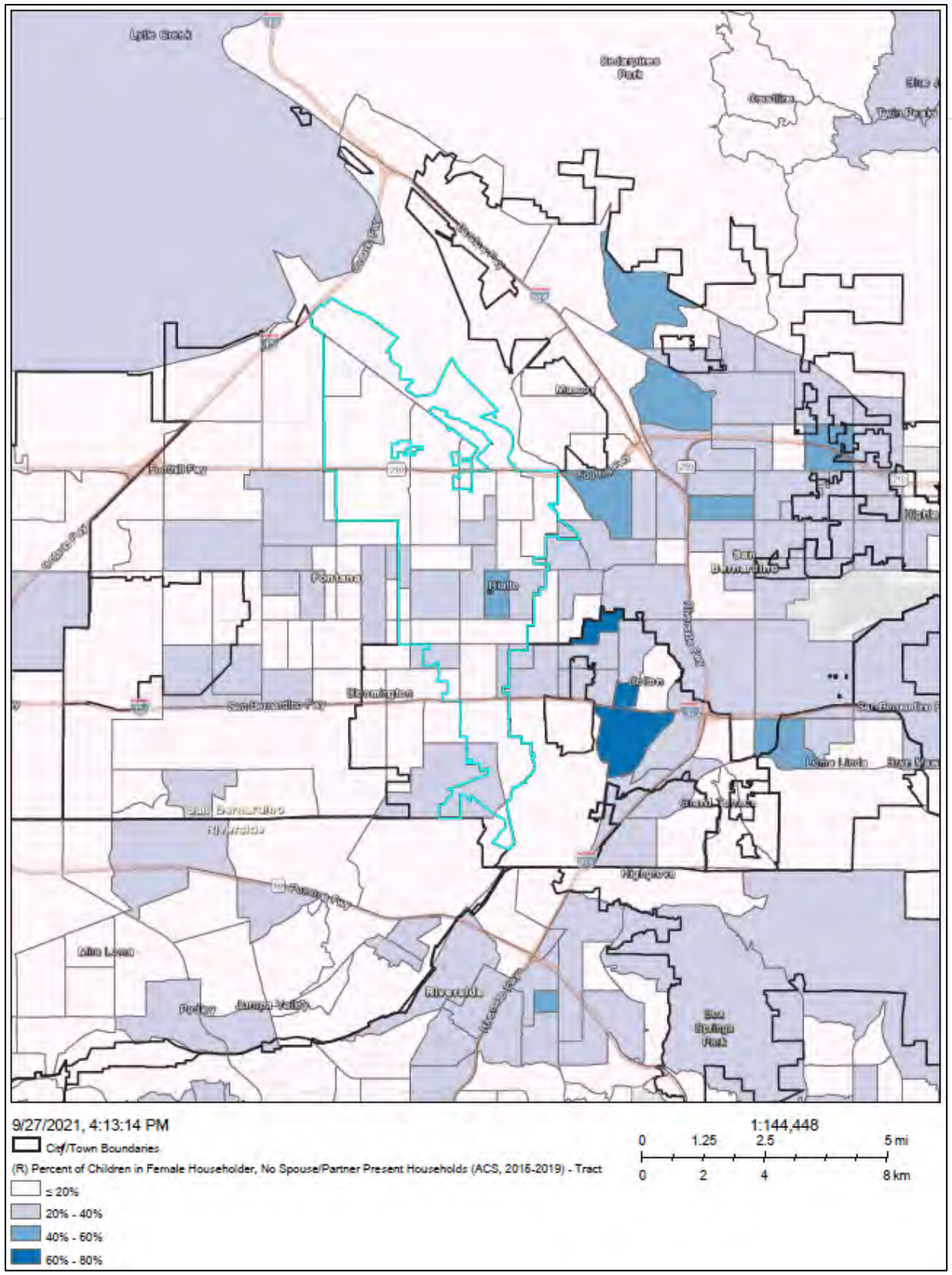
Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-20: Children in Married-Couple Households, Rialto



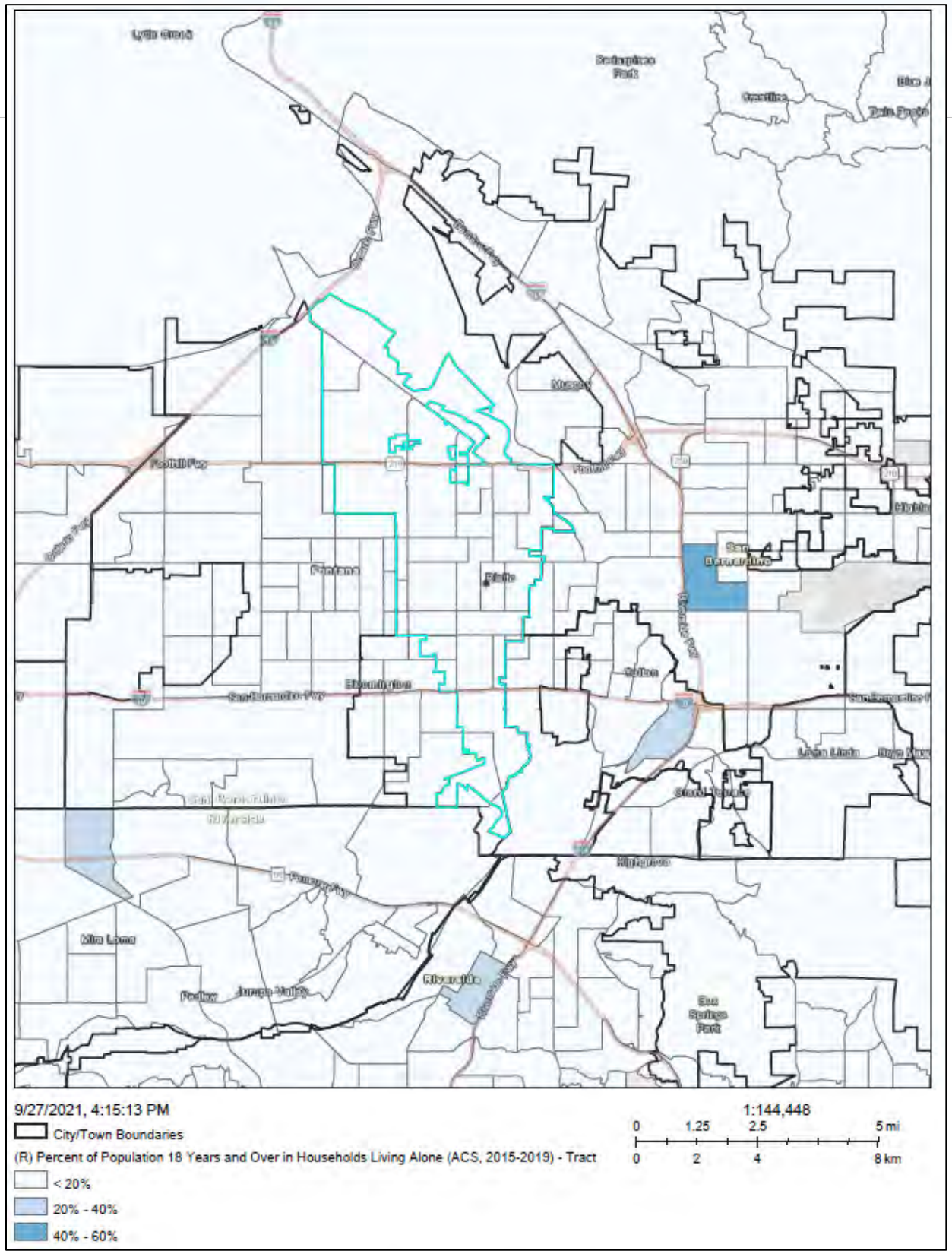
Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-21: Children in Female-Headed Households, Rialto



Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure 3-22: Individuals Living Alone, Rialto



Source: California Department of Housing and Community Development – AFFH Data Viewer

Table 3-27 displays data for households experiencing overpayment or cost burden in the City, County, and State. Displacement is a potential consequence of high housing cost which may also result in limited access to essential goods and employment. Among the jurisdictions compared, the percentage of households that experience a cost burden greater than 30 percent is highest in the City by a small percentage. Cost burden over 50 percent is approximately the same for the City, County, and State. Increased opportunity for affordable housing and housing assistance funds help to prevent cost burden on households.

Table 3-27: Household by Overpayment, Compared by Geography

Overpayment/Cost Burden	City of Rialto	County of San Bernardino	State of California
Cost Burden > 30%	41.8%	40.1%	40.1%
Cost Burden > 50%	19%	19%	19.4%
Cost Burden Not Available	0.7%	1.5%	1.4%

Source: Consolidated Planning/CHAS Data, 2013- 2017.

Table 3-28 displays data for household tenure (owner versus renter) for the City, County, and State. Homeownership is a crucial foundation for helping families with low incomes build strength, stability, and independence. The opportunity for transition into the homebuyer's market is important for persons and households in different communities, homeownership allows for increased stability and opportunity to age in place. **Table 3-28** shows that the City has the highest rate of homeownership compared to the County and State.

Table 3-28: Household by Tenure, Compared by Geography

Household Tenure	City of Rialto	County of San Bernardino	State of California
Owner Households	63.4%	59.8%	54.8%
Renter Households	36.6%	40.2%	45.2%
Total Occupied Housing Units	26,033	636,041	13,044,266

Source: American Community Survey, 5-Year Estimates, 2019.

Table 3-29 displays data for overcrowding in the City, County, and State. Overcrowding is defined as between 1.01 and 1.5 persons per room in a household, and severe overcrowding is defined as more than 1.51 persons per room. Overcrowding often occurs when nonfamily members combine incomes to live in one household, such as college students and roommates, it also occurs when there are not enough size-appropriate housing options for large or multigenerational families. The City experiences higher rates of overcrowding and severe overcrowding compared to the County and the State. Overcrowding is also shown to occur more often in renter households rather than owner households. In Rialto, owner households that are severely overcrowded represent 1.9 percent of all households, while renter households that are severely overcrowded represent 5.9 percent of all households.

Table 3-29: Households by Overcrowding, Compared by Geography			
Overcrowding and Tenure	City of Rialto	County of San Bernardino	State of California
Owner Households			
Overcrowded	8.5%	4.1%	3%
Severely Overcrowded	1.9%	1.3%	1%
Renter Households			
Overcrowded	17.3%	9.9%	8.1%
Severely Overcrowded	5.9%	4%	5.3%
Source: American Community Survey, 5-Year Estimates, 2019.			

5. Discussion of Disproportionate Housing Needs

The analysis of disproportionate housing needs within Rialto evaluated existing housing need, need of the future housing population, and units within the community at-risk of converting to market-rate. A variety of factors affect housing needs for different households. Most commonly, disability, household income and households' characteristics shape the type and size of housing units needed, as well as accessibility based on existing units in a City. **Table 3-30** displayed data for demographic characteristics of Rialto, as compared to the County of San Bernardino and the State of California. Additional detailed analysis of the Rialto community demographics is outline in **Chapter 2: Community Profile of this Housing Element.**

Race and Ethnicity

Table 3-30 below identifies the racial and ethnic composition of the City of Rialto as compared to the County of San Bernardino. The City of Rialto has a majority non-white population. Additionally, the City of Rialto has a population over 74% Hispanic or Latino, compared to less than half for the County.

Table 3-30: Racial and Ethnic Composition		
Race and Hispanic Origin	Rialto	San Bernardino County
Hispanic or Latino	74.8%	55.8%
White Alone	44.3%	75.6%
Black or African American Alone	13.1%	9.4%
American Indian and Alaska Native Alone	0.7%	2.2%
Asian Alone	2.3%	8.5%
Native Hawaiian and Other Pacific Islander Alone	0.0%	0.5%
Two or More Races	13.6%	3.8%
White Alone, Not Hispanic or Latino	8.8%	25.4%
Source: American Community Survey, 5-Year Estimates, 2019.		

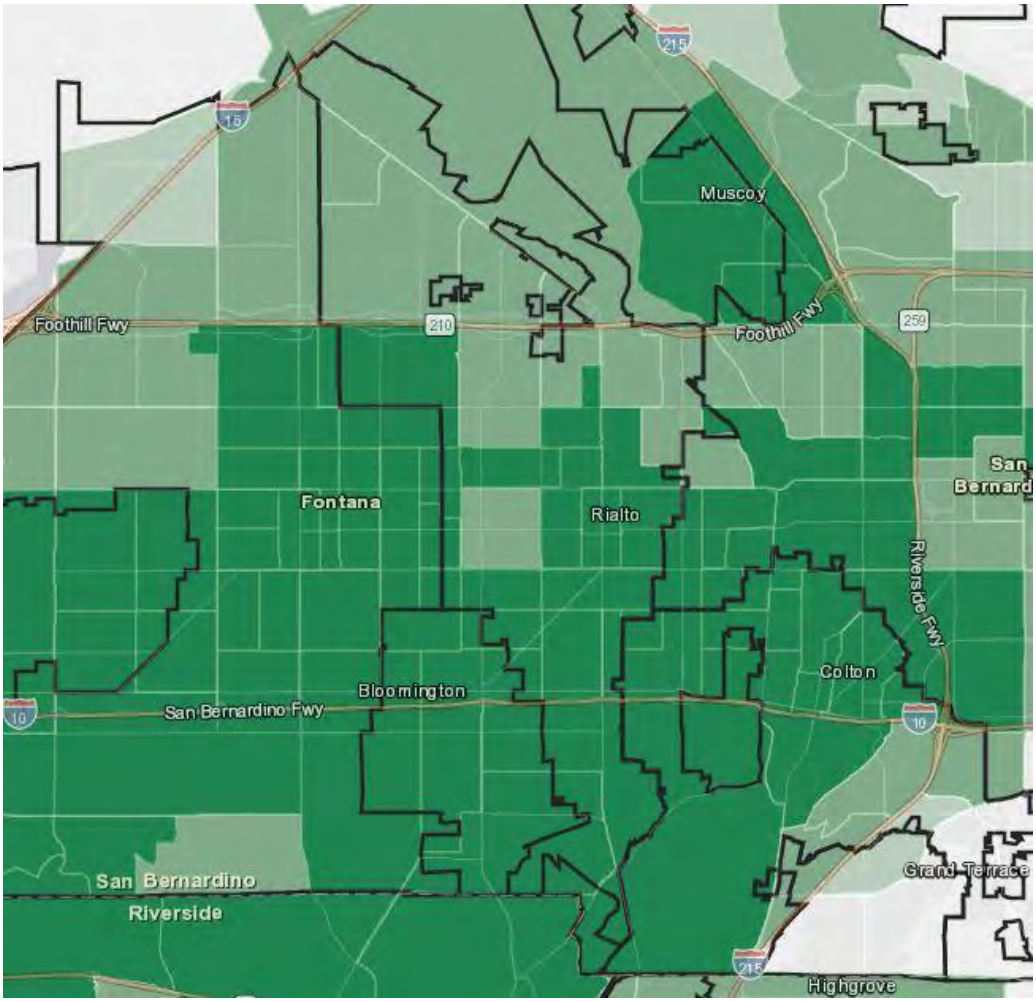
Patterns and Trends for Disproportionate Housing Needs Based On Race/Ethnicity

While the City is predominately Hispanic/Latino, there are noted patterns in the community based on the location of persons living in the City. The exhibit below illustrates the population is predominately Hispanic/Latino in the southern portion of the City compared the northern portion.

Historically, the northern portion of the City is generally newer compared to the southern portion of the City and consists mainly of newer residents, compared to the southern portion that consists of long-term

residents that have long established tenure in the community and have formed families over a longer period of time. While there is a marked difference in the presence of Hispanic/Latino, these trends are similar throughout the region and the State of California and are not viewed as a negative indicator to access to opportunity.

Figure 3-23: Majority Hispanic Tracts in Rialto



Source: AFFH DataViewer. Segregation and Integration Dataset.

Disability

Table 3-31 displays the data for persons with disabilities in the City and County. Overall, about 10.6 percent of the County population reported having at least one disability. The City has a lower percentage of persons with disabilities at 9.5 percent compared to the County's 10.9 percent. Of the 9.5 percent Rialto residents who reported a disability, the majority were ambulatory difficulties, which could be tied to the City's senior population. Ease of reasonable accommodation procedures and opportunity for accessible housing can provide increased housing security for the population with disabilities.

Table 3-31: Disability Status

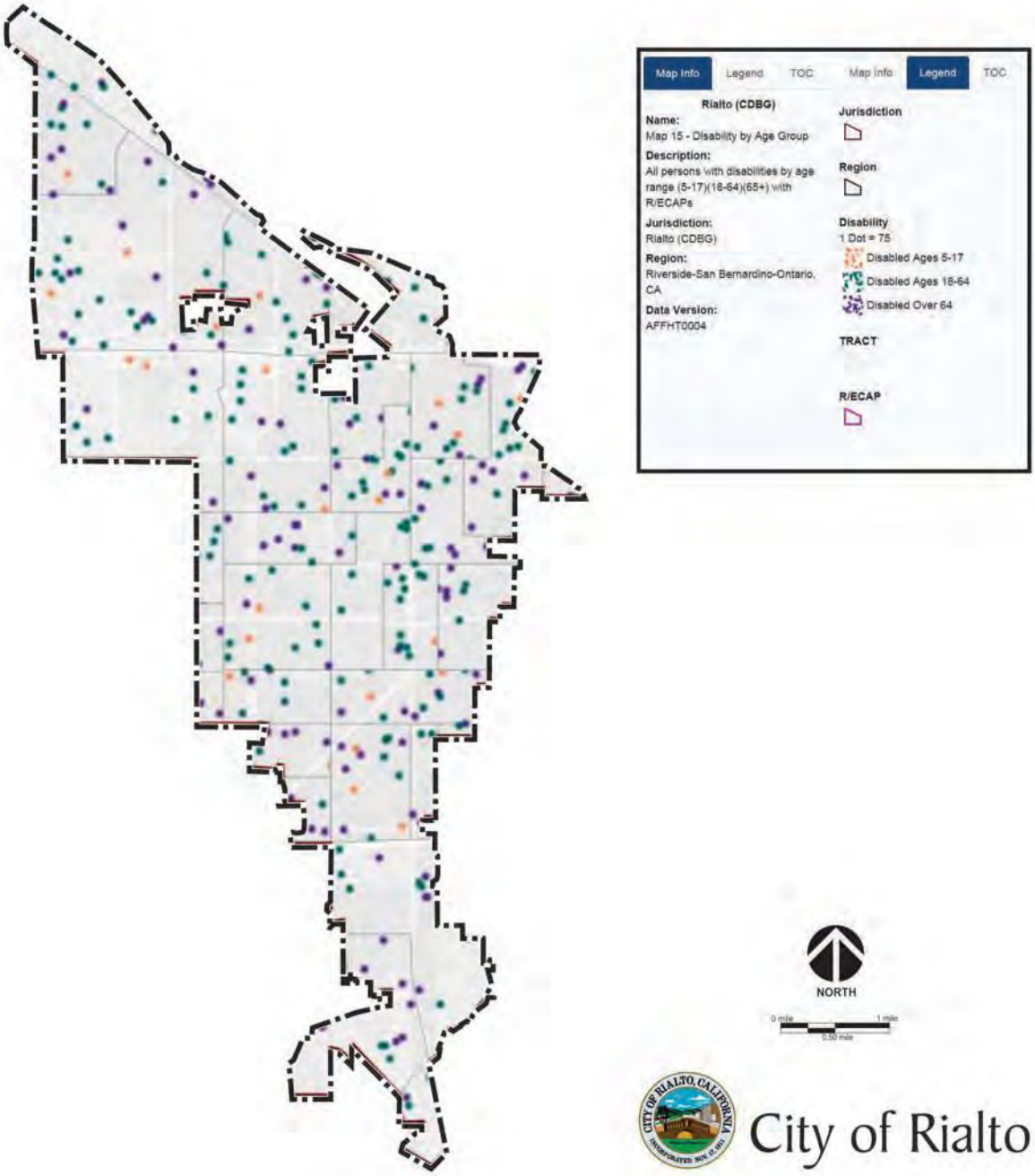
Disability Type	Under 18	18 to 64	65 and Over	Total	Percent of Population with a Disability	Percent of Total Population[1]
Hearing Difficulty	214	742	1,042	1,998	**10.3%**	1.9%
Vision Difficulty	181	964	674	1,819	**9.4%**	1.8%
Cognitive Difficulty	863	2,171	1,101	4,135	**21.4%**	4.3%
Ambulatory Difficulty	177	2,620	2,464	5,261	**27.2%**	5.5%
Self-care Difficulty	233	1,145	1,061	2,439	**12.6%**	2.6%
Independent Living Difficulty	N/A	1,918	1,741	3,659	**18.9%**	4.9%
Total Population with a Disability[2]	**1,207**	**5,019**	**3,491**	**9,717**	--	**9.5%**

1. Total noninstitutionalized population.
2. This number may include persons having more than one disability.
Source: American Community Survey, 5-Year Estimates, 2019.

Figure 3-24 below identifies the occurrence of disabilities throughout the City, according to the most recent ACS data. As the figure illustrates, the City of Rialto has 7,085 disabled residents ages 5 to 64, and another 3,540 elderly residents with disabilities. These data show the numbers living with each different type of disability within the community. There is evidence that individuals report more than one disability. Approximately 23 percent of Housing Choice Vouchers are utilized by persons reporting a disability.

A number of proposed housing sites are located within the areas that have persons with disabilities. While the percentages are relatively low and similar to neighboring communities, the location of the potential future housing sites in these census tracts may provide opportunities for affordable housing in conjunction with or near services.

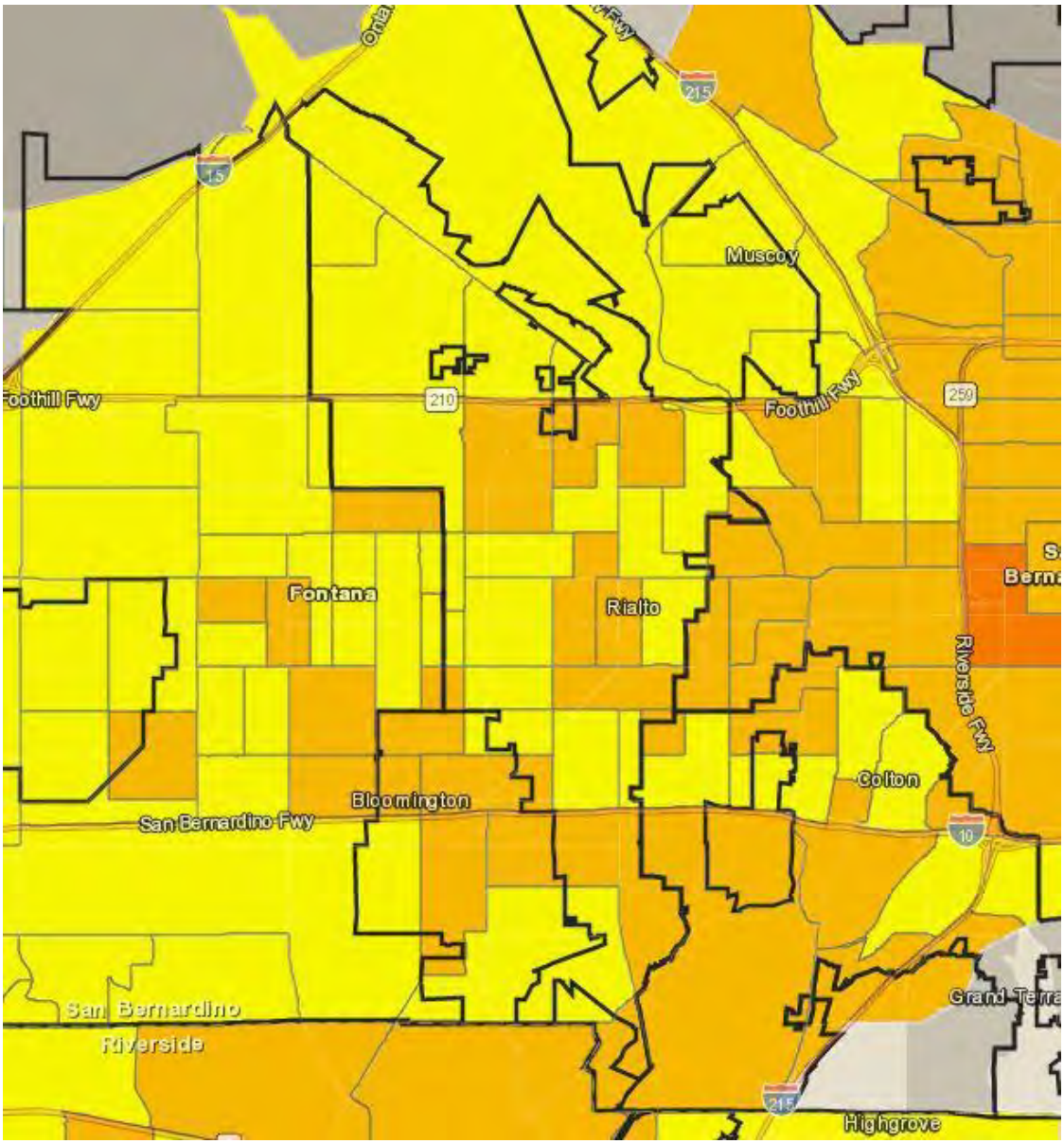
Figure 3-24: Rialto Population by Disability



Patterns and Trends for Disproportionate Housing Needs Based On Disability

Analysis of persons with disabilities indicates there are no significant over concentrations within the city. As shown in the exhibit below, there are a few census tracts with 10-20% incidences of disability status, with all of these census tracts located south of the 210 Fwy. This may be attributed to the fact that most of the newer development is primarily single family and located to the north of the 210 freeway. There are no indications that land use or access to opportunity affect concentrations of persons with disabilities.

Figure 3-25: Population of Census Tracts with a Disability



Source: AFFH Dataviewer. Segregation and Integration Data Set

The City believes the requirements of ADA and other development requirements will not restrict or concentrate persons with disabilities in the community. However, federal/state law and existing City programs and policies support fair housing opportunity to help reduce and/or eliminate potential impacts, such discrimination, to services and opportunity for Rialto's disabled population.

Disproportionate Needs of Persons Experiencing Homelessness

Table 3-32 shows the population of persons experiencing homelessness in Rialto, in the surrounding cities, and in San Bernardino County. Rialto experienced a 38.3 percent increase in its homeless population between 2018 and 2020. Rialto, however, has seen a 60% decrease in its homeless population since 2020.

Table 3-32: Homelessness Status in Raito 2022

Jurisdiction	Sheltered	Transtional Sheltered	Unsheltereed	TOTAL
City of Rialto	0	0	70	70
City of Fontana	7	0	149	156
City of Rancho Cucomonga	0	0	47	47
County of San Bernardino	611	333	2,389	3,333

Soutce: 2022 San Bernardino County Continuum of Care Homeless Count

For the City of Rialto, the following findings for persons experiencing homelessness can be stated:

- 72.7% of Homeless are Male
- 29.1% of Homeless are 55 years of age and older – this may require additional considerations for healthcare and related services.
- 43.6% of Homeless are Hispanic/Latino - this may require bilingual outreach and services to accommodate persons of Hispanic/Latino origin
- 18.2% of Homeless are considered "chronically homeless" – the may require additional services and availability of emergency shelter
- 14.5% of Homeless have a physically limiting disability – this may require additional considerations for healthcare, services and facilities
- 40% of Homeless surveyed have no monthly income – this may require more wrap-around services
-

The City's overall assessment is that addressing gaps in access to opportunity are focused on the ability for the City to provide complementary services and support to current unsheltered populations. Potential gaps in access to opportunity include:

- Services for Homeless (health care, job training, etc.)
- Low-Cost Housing Opportunities
- Services to Non-native English Speakers

As stated in the Chapter 4 Policy Program, a number of policy actions seek to address these potential gaps by prioritizing service availability, increasing the monitoring of sites to accommodate emergency and transitional shelters, improving availability of low-cost housing options (SROs), increasing ease of

approving low barrier navigation centers and supportive services and improving housing opportunities for persons with physical and developmental disabilities.

People experiencing homelessness in Rialto are those who do not have a fixed, regular, and adequate overnight residence, or whose overnight residence is a shelter, street, vehicle, or enclosure or structure unfit for habitation. Factors contributing to increases of homelessness may include the following:

- Lack available resources to support stable housing access
- Spikes in rent increase and lack of tenant protections
- Housing discrimination
- Evictions
- Lack of housing affordable to low- and moderate-income persons
- Increases in the number of persons whose incomes fall below the poverty level
- Reductions in public subsidies to the poor
- The deinstitutionalization of the mentally ill

Residents experiencing homelessness in Rialto have exhibited the following unique challenges to housing:

- Need for increased affordable housing options
- Need for smaller housing unit options such as SRO's
- Rental assistance
- Higher likelihood for transitional and supportive housing
- Lack of access to emergency shelters

Homelessness is a serious issue in the City of Rialto. Although the City has partnered with organizations to assist persons experiencing homelessness, the City has also committed to the following programs:

- **Housing Program 2M:** Single-Room Occupancy (SRO)
- **Housing Program 2I:** Emergency Shelters
- **Housing Program 2J:** Transitional and Supportive Housing
- **Housing Program 5E:** Supportive Housing / Low Barrier Navigation Centers

Patterns and Trends for Disproportionate Housing Needs Based On Homeless Status

Analysis of homeless persons, historically has indicated that homeless persons in the City are located close to where services are offered. While by nature homeless are transient, there are typically higher incidences of homeless persons located in areas that provide services or fulfill the day to day needs of the population.

The City has evaluated the location of homeless persons in sheltered versus unsheltered living conditions. It was found that all known homeless persons in the community are currently living in unsheltered conditions. Current land use patterns and the built environment have no known influence on the location and extent of homelessness in the community. The City's current 2022 homeless population is 60% less than 2020 population, indicating good progress in addressing local incidences of homelessness. As persons experiencing homelessness are in need of low-cost, emergency, or transitional housing shelter with access to services, a suite of housing Programs have been included in the Housing Element to support

the specific needs of the Rialto community. These programs address local trends by supporting service-based housing to the most vulnerable populations in the City.

The homeless population is generally located in the following locations:

- Valley Boulevard
- Foothill Boulevard
- Baseline Road
- Riverside Avenue
- Cedar Avenue,
- Adjacent to the 210 Freeway
- Adjacent to the 10 Freeway
- Bus Stops and Car Washes

There are potential gaps in support and services to this population in these general areas. Challenges include access to safe/sanitary housing, showers/hygiene, presence of vital documentation for use in medical/job and service access, job guidance/training, mental health, addiction support, unemployment, underemployment and low relative wages.

Access to Transportation and Services

Access to transportation and services, specifically public transit and governmental services provides households with affordable and environmentally friendly commuting options. It can also increase accessibility to essential retail such as grocers and markets as well as recreational activities and safe transit options for young adults and children. Access to services helps to connect residents to essential services such as health, mental health, fair housing counseling, support and other services.

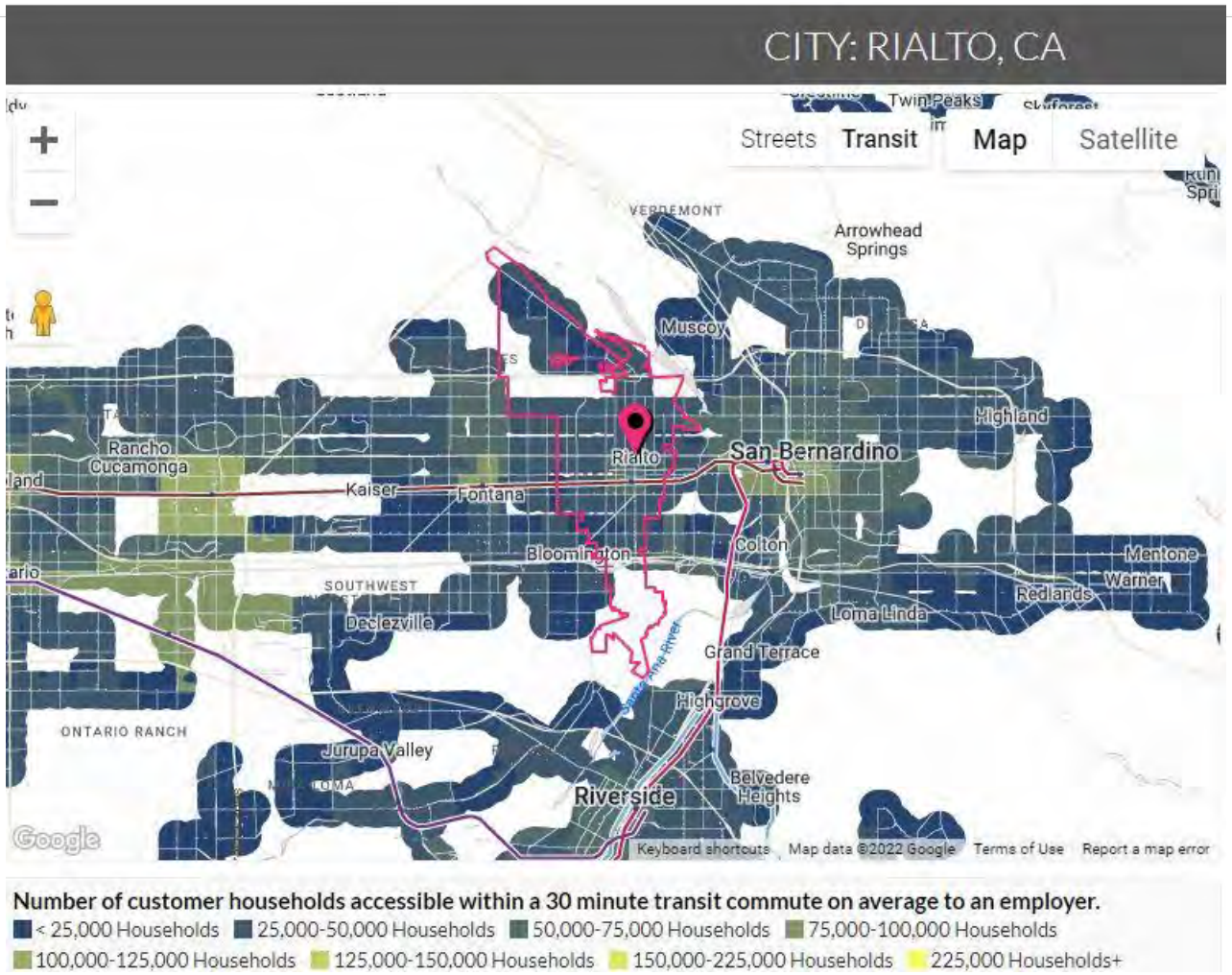
AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided, Rialto scored a 5.5 AllTransit performance score, illustrating moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. Additionally, AllTransit identified the following transit related statistics for Rialto:

- 1,147 transit trips per week within a ½ mile of transit
- 44,123 jobs accessible in 30-minute trip
- 2 transit routes within a ½ mile
- 1.98% of commuters use transit
- 0 percent of low-income households live near transit

By comparison, the City of Rialto scored a 6.0, the City of Fontana scored a 5.5, the City of Rancho Cucamonga scored a 5.1, and the City of San Bernardino scored a 6.7. Access to transportation can increase both economic and environmental/health opportunities. As the map below shows, these areas score well with connectivity compared to most of the other areas of the City. Additionally, **Figure 3-26 below,** shows the proximity to jobs around the City. Towards the south end of the City's center is an area with a low proximity score (due to regional rail lines); however, most of the area in the City has high

scoring transit performance score. The high transit score is important to provide transportation services to residents in the low jobs proximity area so as to access additional employment opportunities.

Figure 3-26 Households Access to Transit with 20 Minute Commute



Housing Stock in Rialto

Tables 3-33 and **3-34** display comparative housing stock data for the City, County, and State. **Table 3-33** below shows data for occupied housing units by type. A variety of housing stock provides increased opportunity in communities for different household sizes and types. The majority (70.8 percent) of housing stock in Rialto is classified as one-unit, detached housing, or single-family housing and 8.9 percent of Rialto's housing stock includes at least 10 units. The County has a very similar housing stock with 70 percent single-family units and 9.5 percent multi-family developments with at least 10 units. In comparison, the State has 57.7 single-family housing units and about 17 percent multi-family developments with at least 10 units.

Table 3-33: Occupied Housing Units by Type, Compared by Geography

Housing Unit Type	City of Rialto	County of San Bernardino	State of California
1, Detached	70.8%	70.7%	57.7%
1, Attached	2%	3.9%	7%
2 Units	0.5%	1.5%	2.4%
3 or 4 Units	7.1%	4.5%	5.5%
5 to 9 Units	4.3%	4%	6%
10 to 19 Units	2.8%	3.1%	5.2%
20 or More Units	6.1%	6.4%	12.3%
Mobile Home or Other Type of Housing	6.4%	5.8%	3.8%

Source: American Community Survey, 5-Year Estimates, 2019.

Table 3-34 below displays housing stock by year built for the City, County, and State. Older housing generally requires more upkeep, regular maintenance and can cause a cost burden on both renters and homeowners. A majority of the City's housing stock was built between 1960 and 1989 (61.3 percent). The County has a similar history of residential development, with over half built in the same decades. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions.

Table 3-34: Housing Unit by Type, Compared by Geography

Housing Unit Type	City of Rialto	County of San Bernardino	State of California
Built 2014 or later	0.3%	1.6%	1.7%
Built 2010 to 2013	2.4%	1.9%	1.7%
Built 2000 to 2009	5.7%	14.1%	11.2%
Built 1990 to 1999	13.3%	13.1%	10.9%
Built 1980 to 1989	32%	22.7%	15%
Built 1970 to 1979	15.5%	17.2%	17.6%
Built 1960 to 1969	13.8%	10.4%	13.4%
Built 1950 to 1959	13.6%	11.5%	13.4%
Built 1940 to 1949	1.1%	3.9%	5.9%
Built 1939 or earlier	2.3%	3.6%	9.1%

Source: American Community Survey, 5-Year Estimates, 2019.

6. Displacement Risk

The potential for economic displacement risk can result from a variety of factors, including large-scale development activity, neighborhood reinvestment, infrastructure investments, and changes in local and regional employment opportunity. Economic displacement can be an inadvertent result of public and private investment, where individuals and families may not be able to keep pace with increased property values and market rental rates.

Urban Displacement

The UC Berkeley Urban Displacement Project developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement. This data was developed to assist local decision makers and stakeholders better plan for existing communities and provide additional resources to areas in need or at-risk of displacement and gentrification. The displacement typologies and the criteria used to identify each category are listed in **Table 3-35** with the census tracts identified in each.

Table 3-35 and **Figure 3-27** show a number of low-income census tracts with susceptibility to displacement. These census tracts are located towards the City's central region. The development of new housing units in areas marked susceptible to displacement may create new opportunities for existing residents to access housing affordable to low and very low-income households, as well as create new opportunities for employment and community resources. The northern region of the City also shows a large area of stable/advanced exclusivity. The remaining census tracts in the City are mostly made up of stable moderate/mixed-incomes. As **Figure 3-27** also shows, candidate sites have been identified throughout the City. A large portion of moderate-income units have been identified in the northern region of the City in the "Stable/Advanced Exclusive" area due to existing Specific Plans. A majority of lower income units have been identified in census tracts identified as "Stable Moderate/Mixed Incomes" and around the City's downtown. Given the City's downtown area is identified as having lower access to services and resources, **Program 5A** is included in **Section 4** to facilitate the creation of additional opportunities for existing and future residents.

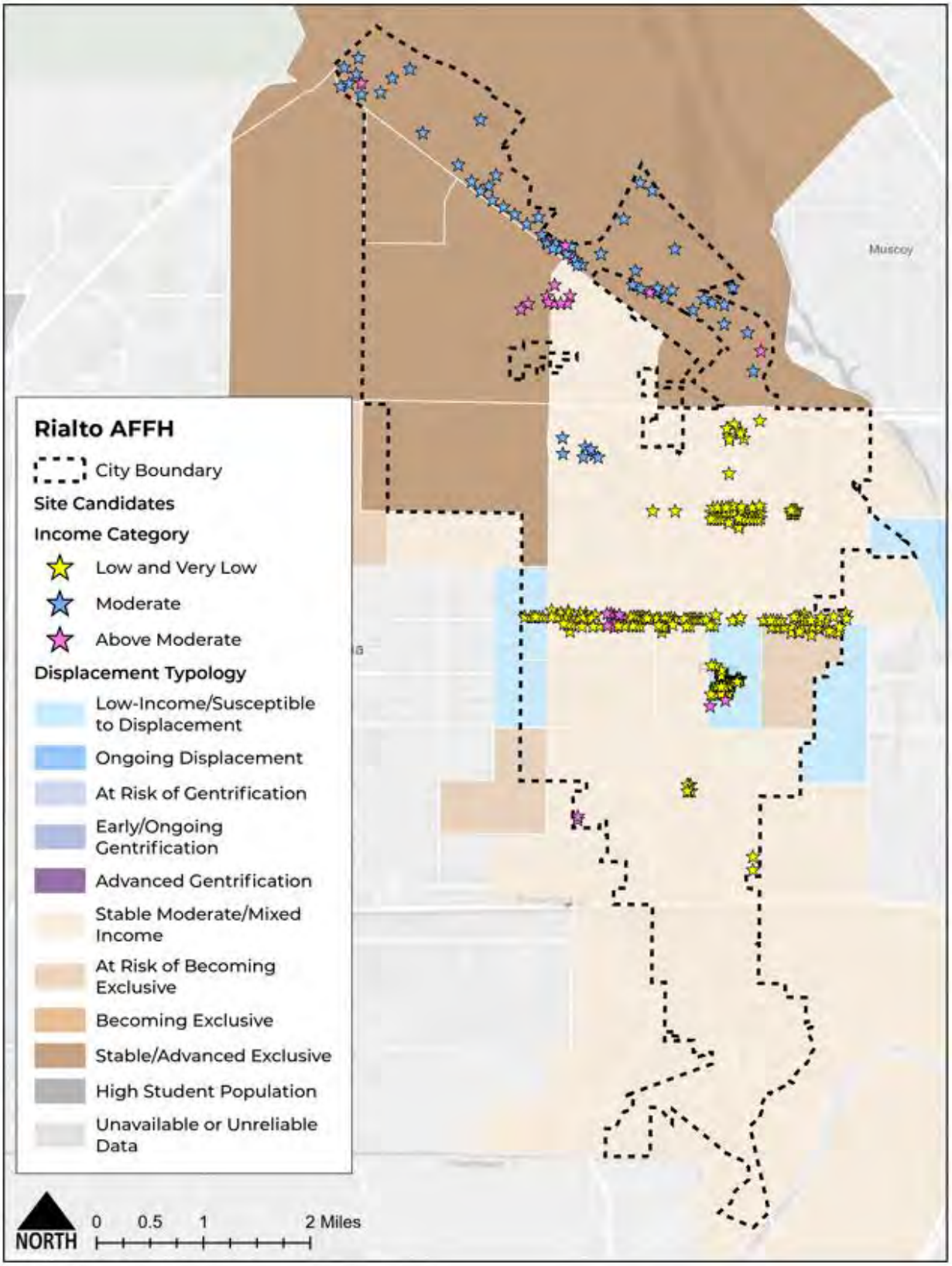
Areas of the City with higher rates of disabled residents do not have any higher susceptibility to displacement than areas with lower rates of disabilities. Although these areas do not have higher susceptibility to displacement, it is important that the City increases access to services and transportation for disabled residents.

Areas of the City with higher rates of female-headed households coincide with areas with higher susceptibility to displacement. **Program 5A** is included in **Section 4** to facilitate the creation of additional opportunities for existing and future residents in these areas.

The City of Rialto population is completely made up of 81 percent or more persons who do not identify as White. This is consistent with the demographics of surrounding communities. Susceptibility to displacement is not correlated with racial or ethnic population patterns or trends. Although displacement is not correlated with racial or ethnic population patterns or trends, it is important that the City increases access to services and transportation for all residents.

Table 3-35: Displacement Typology Criteria and Rialto Census Tracts				
Modified Types and Criteria	**Rialto Census Tracts**			
Low-Income/Susceptible to Displacement • Low or mixed low-income tract in 2018.	37.00 34.05		34.04 43.02	
Ongoing Displacement of Low-Income Households • Low or mixed low-income tract in 2018. • Absolute loss of low-income households, 2000-2018.	--			
At Risk of Gentrification • Low or mixed low-income tract in 2018. • Housing affordable to low or mixed low-income households in 2018. • Didn't gentrify 1990-2000 OR 2000-2018. • Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018. • Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap.	--			
Early/Ongoing Gentrification • Low or mixed low-income tract in 2018. • Housing affordable to moderate or mixed moderate-income households in 2018. • Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018. • Gentrified in 1990-2000 or 2000-2018.	--			
Advanced Gentrification • Moderate, mixed moderate, mixed high, or high-income tract in 2018. • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018. • Marginal change, increase, or rapid increase in housing costs. • Gentrified in 1990-2000 or 2000-2018.	--			
Stable Moderate/Mixed Income • Moderate, mixed moderate, mixed high, or high-income tract in 2018.	27.05 35.03 35.05 35.06 35.07	35.09 35.10 36.03 36.05	36.09 36.06 40.04 36.12	38.03 38.04 36.07 38.01
At Risk of Becoming Exclusive • Moderate, mixed moderate, mixed high, or high-income tract in 2018. • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018. • Marginal change or increase in housing costs.	34.03 39.00			
Becoming Exclusive • Moderate, mixed moderate, mixed high, or high-income tract in 2018. • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018. • Rapid increase in housing costs. • Absolute loss of low-income households, 2000-2018. • Declining low-income in-migration rate, 2012-2018. • Median income higher in 2018 than in 2000.	--			
Stable/Advanced Exclusive • High-income tract in 2000 and 2018 • Affordable to high or mixed high-income households in 2018. • Marginal change, increase, or rapid increase in housing costs.	27.06 27.03 27.04 23.06			
Source: Urban Displacement Project, University of California Berkeley (2021).				

Figure 3-27: Gentrification and Displacement in Rialto



Source: Urban Displacement Project, University of Berkeley (2021)

Assisted Units "At-Risk" of Conversion

Affordable covenants help to ensure that certain housing units remain affordable for an extended period of time. Covenants help balance the housing market in a community and provide lasting affordable options to low and very low-income households.

Table 3-36 below provides a list of 1,037 housing units with affordability covenants, of which 287 housing units are at-risk of converting to market-rate between 2021 and 2031. Consistent with the requirements to analyze the impacts of the potential conversion of these units to market-rate units, this section provides an analysis of preservation of assisted housing units at-risk of conversion.

Jurisdictions are required by State Housing Element Law to analyze government-assisted housing that is eligible to convert from lower income to market rate housing over the next 10 years. State law identifies housing assistance as a rental subsidy, mortgage subsidy or mortgage insurance to an assisted housing development. Government assisted housing may convert to market rate housing for several reasons, including expiring subsidies, mortgage repayments, or expiration of affordability restrictions. This section will provide:

- An inventory of assisted housing units that are at risk of converting to market-rate housing,
- An analysis of the costs of preserving and/or replacing these units,
- Resources that could be used to preserve at-risk units,
- Program efforts for preservation of at-risk housing units, and
- Quantified objectives for the number of at-risk units to be preserved during the Housing Element planning period.

Table 3-36: City of Rialto Assisted Housing Covenants (2021-2031)				
Project Name	Assisted Units	Total Units	Assistance Program	Earliest Possible Date of Conversion
Federally Assisted Units				
Southpointe Villa 302 W. Merrill (1-bdr units)	99	100	Section 8	June 2041
Willow Village 1150 N. Willow	100	100	Section 8	December 2033
Greentree Senior Apartments 245 E. First St.	270	272	LIHTC	December 2030
Nonprofit Units				
TELACU La Paz 164 W. Merrill Ave. (1-bdr units)	69	70	PRAC/202	2061
TELACU Tierra Serrano 773 W. Foothill Blvd.	74	75	PRAC/202/HOME	February 2032
TELACU Rio Alto Senior Apartments 545 Bloomington Ave. (1-bdr units)	74	75	PRAC/202	2067
Citrus Grove Apartments 1432 N. Willow Ave. (100 2-bdr units, 52 3-bdr units)	150	152	LIHTC	2062
Citrus Grove – Phase #2	41	42	LMH, TC	2065
Vista Cascade 433 W. Cascade Dr. (38 2-bdr units, 4 3-bdr units)	41	42	LIHTC	December 2024
Ramrod Mobile Home Park 1010 N. Terrace Ave.	101	202	Former RDA/Non-Housing Funds	Held by nonprofit 2031
The Crossing (Natl. CORE) 177 West South Street	99	100	LIHTC	Held by nonprofit 2029
Park Place Rialto 385 W. Jackson St.	30	32	LIHTC/former RDA	December 2026
Renaissance Villages (Natl. CORE) 220 N. Glenwood	143	144	LIHTC/former RDA	2069
Park Place #2	8	8	Former RDA & NSP	December 2026
Park Place #3	8	8	NSP	December 2028
Total Units	**1,037**	**1,049**		

Inventory of At-Risk Units

There are several assisted housing units in Rialto at-risk of converting to market-rate between 2021 and 2031. These units are listed in **Table 3-37.**

Table 3-37: Units "At-Risk" of Conversion (2021-2031)

Project Name	Assisted Units	Total Units	Assistance Program	Earliest Possible Date of Conversion
Nonprofit Units				
Vista Cascade 433 W. Cascade Dr. (38 2-bdr units, 3 3-bdr units)	41	42	LIHTC	December 2024
Ramrod Mobile Home Park[1] 1010 N. Terrace Ave.	101	202	Former RDA/Non-Housing Funds	Held by nonprofit 2031
The Crossing (Natl. CORE) 177 West South Street (48 2-bdr units, 51 3-bdr)	99	100	LIHTC	Held by nonprofit 2029
Park Place #2[1]	8	8	Former RDA & NSP	December 2026
Park Place #3[1]	8	8	NSP	December 2028
Greentree Senior Apartments 245 E. First St.	270	272	LIHTC	December 2030
Total Units	**527**	**531**		

1. Breakdown of number of units by bedrooms is unavailable – units assumed at one-bedroom.

The City has provided policy programs in **Section 4: Housing Plan** that address the preservation of the units listed in the table above.

Cost of Preservation of Units

While there are many options to preserving units including providing financial incentives to project owners to extend lower income use restrictions, purchasing affordable housing units by a non-profit or public agency, or providing local subsidies to offset the difference between the affordable and market rate units, the strategy considered below is to provide local rental subsidy to residents. The rent subsidy would provide financial assistance to residents if their affordable units converted to market rate. To determine the subsidy needed, Fair Market Rents were compared to market rate rents.

Table 3-38: 2022 HUD Fair Market Rent

Size of Unit	Fair Market Rent
Efficiency	$1,062
1-Bedroom	$1,202
2-Bedroom	$1,509
3-Bedroom	$2,065
4-Bedroom	$2,542

Source: HUD FY 2022 Fair Market Rent Documentation System – Riverside-San Bernardino-Ontario MSA

Table 3-39: Estimated Monthly Subsidy to Preserve "At-Risk" Units						
Unit Size	Monthly Rents		Number of Units At-Risk	Difference	Monthly Subsidy	Annual Subsidy
	Fair Market Rents[1]	Market Rate[2]				
Efficiency	$1,062	$1,165	0	$0	$0	$0
1-Bedroom	$1,202	$1,581	277	$379	$104,983	$1,259,796
2-Bedroom	$1,509	$1,882	196	$373	$73,108	$877,296
3-Bedroom	$2,065	$2,349	54	$284	$15,336	$184,032
4-Bedroom	$2,542	NA	0	$0	$0	$0
					TOTAL	$2,321,124

Source:
1. HUD FY 2022 Fair Market Rent Documentation System – Riverside-San Bernardino-Ontario MSA
2. Kimley-Horn and Associate Analysis – based on apartments listed for rent across nine properties on August 11, 2021.

Cost of Replacement of Units

The City of Rialto can also consider the cost of replacing the units with new construction. Construction cost estimates include all hard and soft costs associated with construction in addition to per unit land costs. The analysis assumes the replacement units are apartments with concrete block with steel frame buildings and parking provided on-site. Square footage estimates are based on estimated size of units to be replaced and assume housing units are developed on multi-family zoned properties. Land costs have been determined on a per unit basis.

Table 3-40: Replacement Cost by Unit Type			
Size of Unit	Cost Per Square Foot[1]	Average Square Foot/Unit[2]	Replacement Cost/Unit[3]
Efficiency	$131.24	567	$74,413
1-Bedroom	$131.24	754	$98,955
2-Bedroom	$131.24	948	$124,416
3-Bedroom	$131.24	1,143	$150,007
4-Bedroom	$131.24	NA	NA

Source:
1. International Code Council – August 2020 Report.
2. Kimley-Horn and Associate Analysis – based on apartments listed for rent across nine properties on August 11, 2021.
3. Includes financing and land acquisition costs of $30,000 per unit.

Table 3-41: Replacement Cost of "At-Risk" Units			
Size of Unit	Replacement Cost/Unit	Number of Units	Total Replacement Cost
Efficiency	$74,413	0	$0
1-Bedroom	$98,955	277	$27,410,535
2-Bedroom	$124,416	196	$24,385,536
3-Bedroom	$150,007	54	$8,100,378
4-Bedroom	NA	0	$0
		TOTAL	$59,896,449

Resources to Preserve At-Risk Units

A variety of programs exist to help cities acquire, replace, or subsidize at-risk affordable housing units. The following summarizes financial resources available:

- **Community Development Block Grant (CDBG)** – CDBG funds are awarded to cities on a formula basis for housing activities. The primary objective of the CDBG program is the development of viable communities through the provision of decent housing, a suitable living environment and economic opportunity for principally low- and moderate-income persons. Eligible activities include administration, fair housing, energy conservation and renewable energy sources, assistance for economic development, public facilities and improvements and public services.
- **HOME Investment Partnership** – Local jurisdiction can receive funds by formula from the Department of Housing and Urban Development (HUD) to increase the supply of decent, safe, sanitary, and affordable housing to lower income households. Eligible activities include housing acquisition, rehabilitation, and development, homebuyer assistance, and rental assistance.
- **Section 8 Rental Assistance Program** – The Section 8 Rental Assistance Program provides rental assistance payments to owners of private, market rate units on behalf of very low-income tenants, senior citizens, disabled and/or handicapped persons, and other individuals for securing affordable housing.
- **Section 202/811 Program** – Non-profit and consumer cooperatives can receive no-interest capital advances from HUD under the Section 202 program for the construction of very low-income rental housing with the availability of supportive services for seniors and persons with disabilities. These funds can be used in conjunction with Section 811, which can be used to develop group homes, independent living facilities and immediate care facilities. The capital advance funding can also provide project rental assistance for the properties developed using the funds. Eligible activities include acquisition, rehabilitation, new construction, and rental assistance.
- **California Housing Finance Agency (CalHFA) Multifamily Programs** – CalHFA's Multifamily Programs provide permanent financing for the acquisition, rehabilitation, and preservation or new construction of rental housing that includes affordable rents for low- and moderate-income families and individuals. One of the programs is the Preservation Loan program which provides acquisition/rehabilitation and permanent loan financing designed to preserve or increase the affordability status of existing multifamily housing projects.
- **Low-Income Housing Tax Credit (LIHTC)** – This program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to those with high tax liability and proceeds are used to create housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.
- **California Community Reinvestment Corporation (CCRC)** – The California Community Reinvestment Corporation is a multifamily affordable housing lender whose mission is to increase the availability of affordable housing for low-income families, seniors, and residents with special needs by facilitating private capital flow from its investors for debt and equity to developers of affordable housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.

Qualified Entities to Preserve

The following organizations have the experience and capacity to potentially assist in preserving at-risk units:

- Century Housing
- Coalition for Economic Survival
- Community Partnership Development Corporation
- Housing Corporation of America
- Jamboree Housing Corporation
- Neighborhood Housing Services of the Inland Empire (NHSIE)
- Nexus for Affordable Housing, Inc.
- Poker Flats Investors LLC
- American Family Housing
- Southern California Housing Development Corporation
- Be.group

Quantified Objectives

Housing Element law requires that cities establish the maximum number of units that can be preserved over the planning period. The City's objective is to preserve the 257 affordable housing units "at-risk" of converting to market rate through policy programs provided in **Section 4: Housing Plan**.

SB 330

Effective January 1, 2020, Senate Bill 330 (SB 330) aims to increase residential unit development, protect existing housing inventory, and expedite permit processing. Under this legislation, municipal and county agencies are restricted in ordinances and polices that can be applied to residential development. The revised definition of "Housing Development" now contains residential projects of two or more units, mixed-use projects (with two-thirds of the floor area designated for residential use), transitional, supportive, and emergency housing projects. SB 330 sets a temporary 5-year prohibition of residential density reduction associated with a "housing development project", from January 1, 2020, to January 1, 2025. For example, during this temporary prohibition, a residential triplex cannot be demolished and replaced with a duplex as this would be a net loss of one unit.

The City has identified two sites as part of its housing sites strategy that each have one existing single-family residence, as outlined in **Appendix B's** Sites Analysis. The two sites are included in the Sites Analysis following a request by the property owner to include six of his properties – they are identified as Randall Avenue Sites. The two properties are proposed as part of the Sites Analysis to be rezoned to accommodate up to 30 dwelling units per acre; thus, creating potential for 10 total dwelling units, including 6 affordable to very low and low income households. All other sites identified within this element are either vacant or have existing non-residential uses with a propensity to redevelop as housing.

7. Assessment of Contributing Factors to Fair Housing in Rialto

In addition to the identified AI impediments and as detailed above, the City of Rialto experiences the following contributing factors to fair housing:

- There is one racially or ethnically concentrated census tracts (R/ECAPS) within Rialto as identified by HUD. These identified census tracts have at least 50 percent non-white populations with a poverty rate that exceeds 40 percent and/or is three or more times the average tract poverty rate for the metropolitan area.
- The UC Davis Regional Opportunity Index shows that the majority of residents within Rialto have low to moderate achievement opportunities and access to opportunities. Additionally, analysis of the TCAC/HCD Opportunity Area Maps show that the majority of the City is categorized as low to moderate resource, meaning there is low access to essential resources for existing residents.
- **Public Investment in Specific Neighborhoods** – The City of Rialto has two census tracts with high segregation and poverty (**Figure 3-13**) and the ROI lowest opportunity ratings (**Figure 3-10 and 3-11)**. These census tracts are also shown as having higher environmental burdens in the CalEnviroScreen map in **Figure 3-17**. As noted in Section 3.C.3, these census tracts have lower percentages of residential uses. The majority of the census tracts are made up of industrial and downtown commercial uses, including government facilities such as City Hall. The existing residential uses are older and date back to when the City was first established. Residential uses mostly include single-family residences and some multi-family developments. Members of the public provided input that informs contributing factors to fair housing issues such as a need for community revitalization strategies to address deferred maintenance in some neighborhoods. Programs are included in **Section 4** to provide for additional resources and engagement with the communities of these census tracts in order to ensure their housing needs and access to opportunities are met and addressed.
- **Availability of Affordable Housing** – Section 2 of this Housing Element provides data on household and economic characteristics. At 10.6 percent the City has the highest unemployment rate in the region. Additionally, 39 percent of households earn an annual income below $50,000. In comparison, the City has 1,049 total deed-restricted affordable housing units. In addition, stakeholders are concerned about the limited supply of affordable units in a range of sizes and types, particularly for seniors and those who are disabled. Programs are included in **Section 4** to continue preserving deed-restricted affordable units, as well as improving economic opportunities and addressing housing needs of the community.
- **Opportunities for Persons with Disabilities** – Affordability, design, location, and discrimination limit the supply of housing for persons with disabilities. Amendments to the Fair Housing Act, as well as state law, require ground-floor units of new multi-family construction with more than four units to be accessible to persons with disabilities. However, units built prior to 1989 are not required to be accessible to persons with disabilities. As provided in **Section 2.G.4** of this Housing Element, approximately 78 percent of the City's housing stock was built prior to 1990 creating challenges in finding adequate and accessible housing for persons with disabilities. Programs are included in **Section 4** to provide for additional opportunities for persons with disabilities.

Local Data and Knowledge, Assessment and Other Relevant Factors:

The City of Rialto was incorporated in 1911, but can trace its roots to the 15th century when the Serrano Native American Tribe settled in the region. Over the next 500 years, Rialto went through multiple iterations – as a Mexican land grant, a ranching and railroad center, a popular stop along Route 66, and, ultimately, a thriving population and economic center for Southern California's Inland Empire.

Today, more than 104,000 people live in Rialto, but only 1,500 called it home when it officially became a city more than a century ago. Rialto's population growth had increased to 3,156 by 1950. In 1956 the population soared to 15,359. By 1964, it showed an increase to 23,290 and 33,500 in 1978. The population grew from 80,000 in 1994 to over 91,873 in 2000, to 104,380 as of the 2021 census.

Rialto's dramatic population increase in the last 50 years has forced the City to expand services, resources, and opportunities to an ever increasing population. The City's population and economic activity have grown exponentially in recent years due to the building of major distribution centers in the region. Rialto is home to major regional distribution centers for Staples, Amazon, Under Armour, Medline Industries, Niagara Bottling, Monster Energy and Target. Distribution centers provide employment opportunities for residents. While increased employment opportunities benefits Rialto, the City experiences an increased pollution burden due to increased trucking routes in the region.

Past zoning and land use practices have resulted in the large industrial footprint in Rialto. Currently, there are virtually no residential uses south of the I-10. Similarly, a significant portion of land to the north and south of SR-210 is comprised of industrial uses. Residential areas are fragmented by industrial and commercial uses. These historical land uses have contributed to a fragmented community.

Current Local Contributing Factors

The analysis within this Affirmatively Furthering Housing (AFFH) Section identified the following considerations related to affordable housing:

- The City does not have any racial or ethnic groups that score higher than 41 on the dissimilarity index, indicating that while there are racial and ethnic groups with higher levels of segregation than others within Rialto, none meet the standard set to identify segregated groups.
- The City has one racially or ethnically concentrated census tracts (R/ECAPs) as identified by HUD. This indicates that there is one census tract in the Downtown area within Rialto with a Non-White population of 50 percent or more or any census tracts that have a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area.
- The UC Davis Regional Opportunity Index shows that the residents within Rialto have a moderate to low level of access to opportunity throughout the majority of the City, with only a few census tracts showing a high level of access to opportunity.
- The analysis of the TCAC/HCD Opportunity Area Maps show that most census tracts in Rialto are classified with the "Low Resource," "Moderate Resource" "High Resource" designation. This indicates that these census tracts are within the top forty percent in the region in terms of areas that lower-income residents may thrive if given the opportunity to live there.

- The Opportunity Indices identify overall low to moderate access to quality resources including economic and job proximity, educational access, and transportation access. Additionally, there is a lower average health index, indicating increased potential for pollution and lower environmental quality across all racial/ethnic groups in the City. The Opportunity Indices also identify lower average affordable transportation options to both the Asian or Pacific Islander (Non-Hispanic) and Native American (Non-Hispanic) populations.
- The City provides moderate transit trip opportunity, additionally, about 76% of all city jobs are within ½ mile of transit but just under 2 percent of the working population uses public transit as a primary source of transportation.
- There are 287 current units with affordable covenants at risk of converting to market rate before the year 2031.
- The CalEnviro Screen mapping tool (2018) identified most of the City as moderate to high scoring, indicating high pollution levels, some of which overlap with identified R/ECAPs in the City.
- The City has a proactive code enforcement function, so long standing code enforcement issues area generally not problematic in concert with addressing complaints, the City proactively addresses and enforces code issues. Therefore, the age of certain areas (downtown) may exhibit a higher rate of deferred maintenance, mainly attributed to overall age of a structure.

Other Local Contributing Factors

There are a number of other factors that contribute to and cause these fair housing issues listed above. The following lists a number of contributing factors unique to the City of Rialto as known through the City's local observations

Fair Housing Outreach and Enforcement – The City of Rialto learned through the community outreach process that many individuals with fair housing-related issues do not know available resources to address fair housing issues. There is a general lack of knowledge about how to acquire informational resources and education. There is general systemic lack of awareness of fair housing laws. The City is aware of the need to provide additional resources and information on fair housing, as well as target areas with higher rates of complaints and low resources.

Public Investment in Specific Neighborhoods – The City of Rialto is generally made up of moderate economic opportunities. The City's central region is made up of low to moderate scores, but there are pockets of higher scores and large high-scoring regions to the north of the City. The City of Rialto fairly resembles the surrounding region in terms of opportunity levels. The neighboring City of Fontana is very similar to Rialto with lower opportunity scores towards the City's central region and higher scores in the northern and southern region. In contrast, the San Bernardino region is predominantly made up of very low scoring economic opportunities as illustrated in **Figure 3-13.** The majority of the City is measured at the lowest opportunity levels, with few moderate to high opportunity census tracts in the northern region of the City. The TCAC/HCD Opportunity Area Maps (**Figure 3-13**) also reports tracts with high segregation and poverty surrounded by others with low resources at the center of the City. When compared to the AllTransit performance mapping in **Figure 3-16**, Rialto scored a 6.0 AllTransit performance score, illustrating a moderate to high combination of trips per week and number of jobs accessible that enable

a moderate number of people to take transit to work. By comparison, the cities of Fontana, Colton, and San Bernardino scored lower AllTransit scores. The City of San Bernardino is the only nearby city which scored higher than Rialto, with an AllTransit score of 6. A lack of transportation options throughout the City may restrict residents from accessing resources and opportunities not within their immediate neighborhoods. Furthermore, when compared to the CalEnviroScreen in **Figure 3-17**, the center of the City with the lowest levels of resources may also experience potential pollution burdens. The City must focus on investing in the central area and central corridors to provide those most potentially impacted by pollution and poor mobility with additional resources. Staff from the City's Code Enforcement and Planning Department have noted the need to improve investment in east/west corridor areas of the City to improve access to opportunity. Additionally, recent community participation has suggested that public investment in local neighborhoods in the south and central areas of the City will contribute to the alleviation of conditions that affect neighborhood degradation.

Availability of Affordable Housing – Section 2 of this Housing Element provides details on household income throughout Rialto. **Table 2-15** states there are a total of 6,480 households in Rialto which earn 50 percent or below the HUD Area Median Income (HAMI) and 5,140 households which earn between 51 and 80 percent of the HAMI. These are considered extremely low-/very low-income households and low-income households. In comparison, the City currently has 1,307 affordable units with covenants protecting the affordability. The policies and programs established in **Section 4: Housing Plan** allow for the addition of 4,001 units affordable to lower income households to meet the RHNA allocation and local existing need. In addition to allowing for the development of additional affordable housing units for current lower income residents, the City must provide additional resources and outreach to organizations and residents regarding aid available for those in need. Throughout the planning process for the Housing Element update, community and advocacy group concerns have indicated the lack of affordable housing options as a major constraint in Rialto. This includes both rental and ownership opportunities. Additionally, family-sized housing units are important to serve the needs of lower income families in Rialto. While affordable housing opportunities exist, there is additional concern about the accessibility of the total available units to meet existing and projected demand, opportunities for homeownership for lower income residents and family-sized housing have been identified as priority concerns by the community.

Access to Proficient Education – Section 3 of this Housing Element evaluates various opportunity measurements of the City and of residents. The UC Davis Center for Regional Change and Rabobank identifies lower comparable educational achievements for Rialto residents. These data show English and math proficiency levels lower in Rialto compared to the State, as well as low percentages of college educated adults and UC/CSU eligibility**.** School proficiency indexes by race and ethnicity; all racial and ethnic groups scored lower than average compared to the State. Each racial and ethnic group scored an index less than 50 in all categories. These scores and measurements point towards low opportunities and poor access to proficient education for children and young adults in the City. With the recent pandemic, access to education has become a greater challenge that can be exacerbated by other conditions. The City understands that access to education is critical for the improvement of opportunity and will contribute directly to overall community development and improvement.

Local Zoning Trends –The transition from an agricultural economy over time has created challenges in land uses patterns as more regional transportation networks have bifurcated the City with the expansion of the 10 freeway and recently built 210 freeway. This has caused an increase in new traditional single-family subdivisions to develop in the northern area of town and less investment in the Central areas.

There has been more recent investment in residential to the north of the 210 freeway due to a variety of factors:

- Large scale land ownership, creating large residential subdivisions
- Investment in regional serving shopping and retail
- Investment in large scale logistics/distribution facilities.

The southern portion of the City has development as old as 1911 when the city was incorporated. There is much more mature infrastructure and neighborhoods and investment differs from other areas, as it is limited smaller scale infill type opportunities. While not an issue that restricts growth, it limits the scale and extent of opportunity due to limitations on site availability. Therefore, much of the focus of change in the southern area of the City is to provide a greater balance of opportunity and services in an equitable fashion.

Historic Land Use Changes and Investments

Historically, the City was developed through the incorporation from previous County land. Prior land use and regulations were influenced by original county land use for a mainly agricultural community. The City began to trend to a more modern, suburban community after its incorporation in 1911.

Regional transportation played a major role in the layout of the community, where Route 66 and the Railroad influenced the location of growth in the community. These major corridors maintain the highest level or growth in the community and continue to influence areas of opportunity.

Growth and services generally follow the growth and extent of the transportation system. These investments have focused much of the new single-family development to the northern portion of the City, which have greater access to regional transportation corridors.

The City has seen significant change in its land use patterns that influence residential opportunity in the City. These include:

- Redevelopment of the Rialto Airport to a job/retail/housing center
- Extensive use of former farmland to the north for large scale logistics/distribution facilities
- Impact of shifting regional transportation from Route 66/Foothill to the 10 and 210 freeways

As the City selected current sites for residential opportunity, past redevelopment trends were considered to site opportunity where there would be the highest level of propensity to change from existing to residential use. The sites identified in the inventory are selected because they exhibit the highest level of propensity to transition to residential use.

Past Redlining, CCR's and other Policies/Regulations

There are no known past or current redlining policies that have restricted access to opportunity in Rialto. However, long standing parcelization of land has likely influenced the development of larger tracts of land in the northern portion of the City.

8. Analysis of Sites Pursuant to AB 686

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA (provided in Appendix B), but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

Framework for AB 686 Analysis

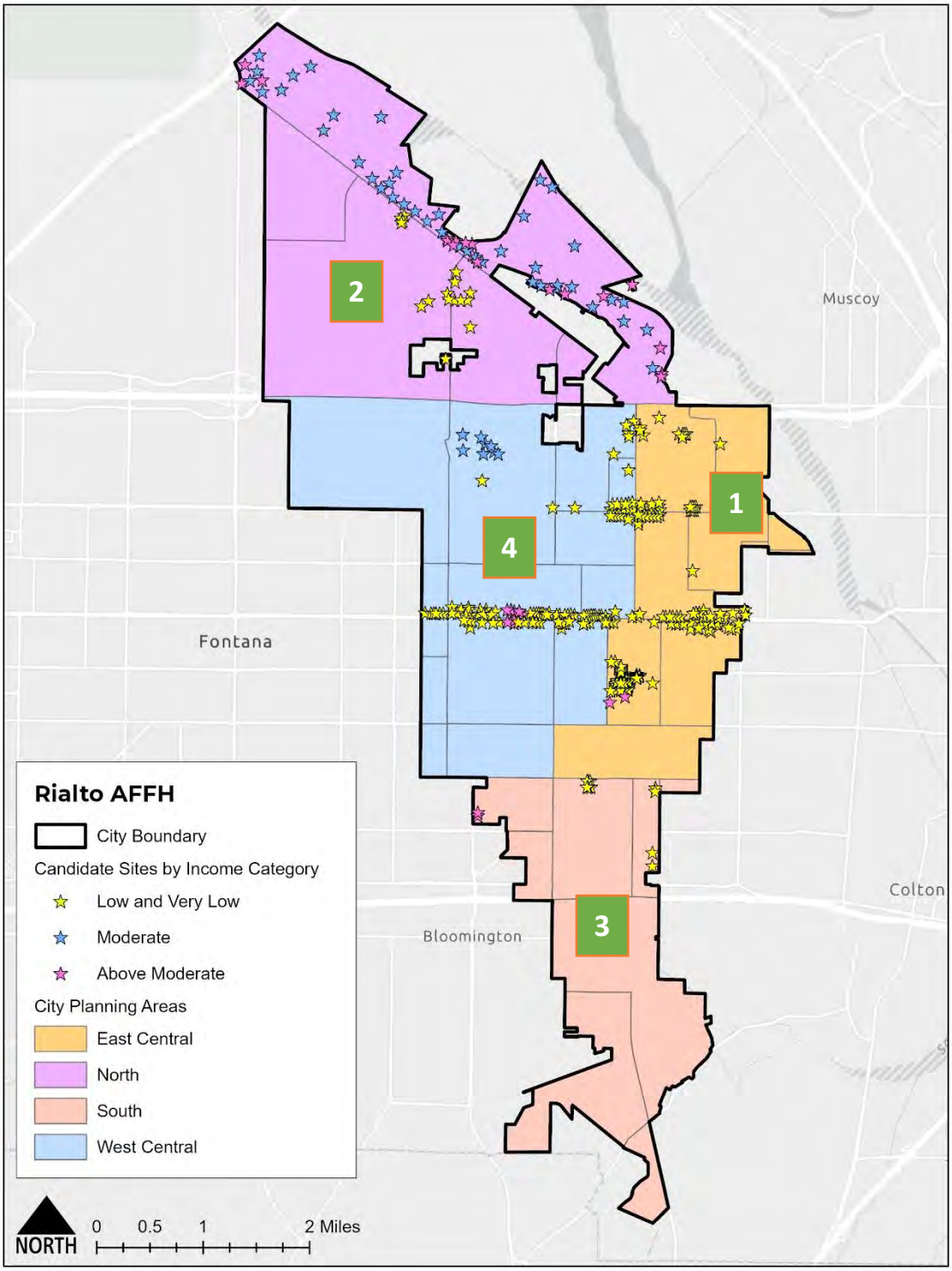
As depicted in **Figure 3-28** and **Table 3-42**, the City has established AB 686 Planning Areas for a comparative analysis of how its RHNA inventory and policies are affirmatively furthering fair housing. This framework is based on AB 686 Planning Areas that considered demographics, segregation and integration, race, income, racially/ethnically concentrated areas of poverty, racially concentrated areas of affluence, urban displacement, and RHNA spread.

These planning areas are:

1. *East Central*
2. *North*
3. *South*
4. *West Central*

The AB 686 Planning Areas were not established for zoning or regulatory purposes, but rather to reflect areas in the City that share similar qualities with respect to income, race, concentrated areas of poverty or affluence, and urban displacement risks. The goal of the analysis is to ensure that the City's housing policy approach is not intentionally worsening existing fair housing challenges.

Figure 3-28: AB 686 Planning Areas



Sources: City of Rialto, HCD AFFH Data Viewer (February 2023)

Table 3-42: AB 686 Planning Area Summary Analysis										
Planning Area	Census Tracts	Census Block Groups	AVG. Non-White	R/ECAP	RCAA	TCAC AOP	RHNA Lower Income	RHNA Moderate	RHNA Above Moderate	RHNA Total
1: East Central	6	11	91.3%	0	0	67% Low Resource 17% High Segregation & Poverty 17% Moderate Resource	1,790	160	1,424	3,374
2: North	4	5	83.1%	0	0	25% Moderate Resource 75% High Resource	403	666	6,024	7,093
3: South	3	3	88.5%	0	0	63% Low Resource 38% Moderate Resource	377	34	298	709
4: West Central	7	12	92.6%	0	0	50% Low Resource 10% High Segregation & Poverty 40% Moderate Resource	2,195	641	2,791	5,627
TOTAL	20	31	-	0	0	-	4,765	1,501	10,538	16,803

As shown in **Table 3-42**, Rialto is predominately non-White across the entire city. Therefore, racial segregation pattern analysis requires a unique framework to determine some of the nuances and patterns that may exist at a block group level within a city that is largely non-White. Planning Areas 1 and 4 are overwhelmingly non-White at 91.3 and 92.6 percent, respectively, while Planning Areas 2 and 3 are still majority non-White, but at 83.1 and 88.5 percent, respectively. Within this breakdown, there are no Racially/Ethnically Concentrated Areas of Poverty in any of the planning areas. It is important to note that the majority of the City is identified by TCAC as low resource, and that even within certain areas identified as Moderate Resource, there are limited development or redevelopment opportunities. The spread of RHNA inventory shows that lower income units are not only allocated to low resource areas, but, wherever possible, also in moderate and high resource areas, ensuring an equitable and fair distribution of affordability across the City. The detailed analysis by Planning Areas explains how limited inventory Moderate Resource areas and Accessory Dwelling Unit production can play a key role in increasing housing stock volume and improving affordability. Urban Displacement Indicators reveal that portions of Planning Area 1 and 4 are Low-Income/Susceptible to Displacement, whereas portions of Planning Area 2 and 3 are Stable Moderate/Mixed-Income. This displacement typology can be addressed through programs that are focused on displacement and tenant protections.

Overall AB 686 Program Considerations:

- Any Program that identifies goals for increased affordable housing production should geographically target TCAC Low Resource/High Segregation & Poverty areas for special engagement and strategic action.

- Any Program focused on tenant protections, displacement, and/or equity should geographically target TCAC High Segregation and Poverty and Urban Displacement Low-Income/Susceptible to Displacement areas for special engagement and strategic action.
- Any Program that identifies goals for increased Housing Authority investment and support should geographically target TCAC High Segregation and Poverty areas for special engagement and strategic action.

Detailed AB 686 Analysis by Planning Area

- **AB 686 Planning Area 1: East Central**

Characteristics: As shown in **Table 3-43**, the *East Central AB 686 Planning Area* is characterized by six census tracts across 11 census block groups. There are no R/ECAP or RCAA areas identified in the East Central AB 686 Planning Area. This Planning Area contains at least 50 percent low- or moderate-income population. The majority of lower income sites identified for the RHNA inventory for this Planning Area are located within the Rialto Central Area Specific Plan, which is contained within Census Tract 06071003700. A second significant portion of the RHNA inventory is made up of sites identified within the Foothill Boulevard Specific Plan and the Rialto Central Area Specific Plan, which includes Census Tracts 39.00 (low estimated displacement risk), 38.03 (low estimated renter displacement risk), and 37.00 (probable displacement risk).

Assessment: The addition of 1,790 lower income housing units can provide additional affordable housing opportunities for an area that can be characterized as lower income. Neighborhoods within this plan area identified primarily as low estimated displacement risk with one Census Tract (38.03) as probable displacement risk.

Table 3-43: ABA 686 Planning Area 1: East Central								
Census Tract	Block Group	Hispanic/Latino	Non-White	Low/Mod Income	RHNA Lower Income	RHNA Moderate	RHNA Above Moderate	RHNA Total
36.07	1	76.5%	90.8%	52.8%	0	0	0	0
	2	83.1%	91.7%	49.5%	0	0	0	0
37.00	1	84.6%	91.7%	77.4%	42	4	30	76
	2	70.0%	92.5%	82.2%	208	10	278	496
38.01	1	65.9%	91.6%	28.6%	24	0	21	45
	2	73.3%	91.0%	40.5%	227	21	165	413
	3	59.9%	90.7%	46.6%	121	15	87	223
38.03	1	75.4%	90.3%	50.4%	121	13	85	219
	2	81.0%	91.7%	44.8%	451	42	325	818
38.04	1	71.6%	92.9%	36.4%	20	2	15	37
	2	58.5%	88.6%	48.9%	91	9	66	166
	3	63.7%	92.7%	45.0%	0	0	0	0
39.00	1	84.7%	92.2%	59.4%	434	40	314	788
	2	86.7%	89.9%	54.0%	0	0	0	0
	3	83.5%	91.6%	30.0%	0	0	0	0
43.01	11	74.6%	97.2%	56.3%	51	4	38	93
	13	68.8%	93.4%	58.2%	0	0	0	0
43.02	3	69.6%	90.7%	83.4%	0	0	0	0
44.01	1	73.8%	79.8%	86.6%	0	0	0	0
	2	79.6%	90.6%	42.8%	0	0	0	0
	3	82.4%	95.0%	56.2%	0	0	0	0
TOTAL					1790	160	1424	3,374

- **AB 686 Planning Area 2: North**

Characteristics: As shown in **Table 3-44**, the *North AB 686 Planning Area* is characterized by four census tracts across five census block groups. There are no R/ECAP or RCAA areas identified in the East Central AB 686 Planning Area. This Planning Area contains a low- or moderate-income population below 35 percent. There are 403 lower income units proposed for this Planning area. The majority of lower income sites are within the Housing Opportunity Overlay focus area and is located primarily along Linden Avenue and Riverside Avenue. Additionally, moderate-income sites identified for the RHNA inventory for this Planning Area are located within the Lytle Creek Ranch Specific Plan, which is contained within Census Tract 06071002706 (low estimated displacement risk). Several sites identified for RHNA (above moderate) are also located on the border of the Rialto Airport Specific plan.

Assessment: The addition of 403 lower income housing units and 666 moderate income units can provide additional affordable housing opportunities for an area that can be characterized as higher income. Neighborhoods within this plan area are identified as low estimate displacement risk.

Table 3-44: ABA 686 Planning Area 2: North

Census Tract	Block Group	Hispanic/Latino	Non-White	Low/Mod Income	RHNA Lower Income	RHNA Moderate	RHNA Above Moderate	RHNA Total
27.03	1	56.8%	81.9%	23.3%	0	0	0	0
	2	51.7%	77.1%	17.4%	0	0	0	0
	3	56.3%	78.2%	16.2%	0	0	0	0
27.04	1	57.6%	83.2%	29.5%	0	0	0	0
	2	46.0%	83.4%	14.2%	67	5	48	120
	3	59.7%	88.7%	26.6%	97	8	68	173
27.05	1	62.0%	80.6%	32.9%	137	11	100	248
	2	62.4%	86.9%	13.4%	102	10	73	185
	3	60.2%	88.4%	25.8%	0	0	0	0
	4	63.2%	90.1%	20.3%	0	0	0	0
27.06	1	50.3%	72.9%	6.3%	0	632	5,735	6,367
	2	58.8%	87.7%	15.5%	0	0	0	0
	3	52.8%	81.0%	18.9%	0	0	0	0
TOTAL					403	666	6,024	7,093

- **AB 686 Planning Area 3: South**

Characteristics: As shown in **Table 3-45**, the South AB 686 Planning Area is characterized by three census tracts across three census block groups. There are no R/ECAPS or RCAAs identified in the South AB 686 Planning Area. Seventy to 85 percent of the residents in these Census Tracts are Hispanic or Latino. The Planning Area contains at least 30 percent low- or moderate-income population. The majority of the lower income sites identified for the RHNA inventory for this Planning Areas are located within the Gateway Specific Plan, which is contained within Census Tract 06071004004. The lower income sites are also located within the Housing Opportunity Overlay focus area. This Census Tract also falls within an area that shows low estimated renter displacement.

Assessment: The addition of 377 lower income housing units can provide additional affordable housing opportunities for an area that can be characterized as moderate income. Neighborhoods within this plan area are identified as low estimate displacement risk.

Table 3-45: ABA 686 Planning Area 3: South

Census Tract	Block Group	Hispanic/Latino	Non-White	Low/Mod Income	RHNA Lower Income	RHNA Moderate	RHNA Above Moderate	RHNA Total
34.03	1	82.7%	88.2%	62.8%	0	0	0	0
	2	77.7%	83.6%	35.9%	0	0	0	0
36.05	1	84.3%	92.0%	38.3%	0	0	22	22
	2	70.6%	89.5%	38.3%	0	0	0	0
36.06	1	79.1%	89.4%	33.7%	0	0	0	0
36.09	1	80.4%	86.6%	62.6%	0	0	0	0
	2	85.7%	93.4%	30.8%	0	0	0	0
	3	72.3%	89.7%	67.0%	50	4	38	92
36.11	1	78.3%	94.7%	42.5%	0	0	0	0
	2	72.1%	84.6%	51.6%	0	0	0	0
36.12	2	73.7%	84.6%	51.6%	327	30	238	595
40.03	1	85.9%	90.1%	54.3%	0	0	0	0
40.04	1	80.0%	86.1%	57.4%	0	0	0	0
	2	71.9%	82.5%	40.4%	0	0	0	0
TOTAL					377	34	298	709

- **AB 686 Planning Area 4: West Central**

Characteristics: As shown in **Table 3-46**, West Central AB 686 Planning Area is characterized by seven census tracts across twelve census block groups. There are no R/ECAPs or RCAAs identified in the West Central Planning Area. Between 60 and 85 percent of residents in these Census Tracts are Hispanic Latino and Non-White populations generally fall in the 90th percentile. The Planning Area contains at least 20 percent low- or moderate-income population. The majority of the lower income sites identified for the RHNA inventory for this Planning Areas are located within the Foothill Boulevard Specific Plan, which is contained within Census Tracts 06071003507, 06071003509, 06071003510. Census Tracts 06071003507 and 06071003509 fall within areas that show low estimated renter displacement risk while Census Tract 06071003510 shows probable displacement risk.

Assessment: The addition of 2,080 lower income housing units can provide additional affordable housing opportunities for an area that can be characterized as moderate income. A majority of neighborhoods within this plan area identified as low estimate displacement risk except for Census Tract 06071003510 which shows probable displacement risk.

Table 3-46: ABA 686 Planning Area 4: West Central

Census Tract	Block Group	Hispanic/Latino	Non-White	Low/Mod Income	RHNA Lower Income	RHNA Moderate	RHNA Above Moderate	RHNA Total
23.01	1	72.2%	88.9%	20.8%	0	0	0	0
	2	68.8%	92.2%	46.3%	0	0	0	0
23.01	1	87.8%	93.3%	37.8%	0	0	0	0
23.06	1	71.4%	90.1%	50.8%	0	0	0	0
	2	71.0%	92.0%	30.5%	0	0	0	0
23.07	1	75.4%	90.3%	52.2%	0	0	0	0
	2	83.9%	92.6%	31.9%	0	0	0	0
34.04	1	79.2%	92.5%	87.3%	0	0	0	0
	2	77.2%	87.5%	40.7%	107	10	77	194
	3	80.2%	96.8%	50.6%	0	0	0	0
34.05	1	82.9%	86.4%	65.9%	0	0	0	0
	2	82.3%	93.8%	68.4%	0	0	0	0
	3	67.4%	95.9%	52.7%	0	0	0	0

35.03	1	73.1%	93.5%	36.1%	77	445	1002	1524
	2	72.2%	91.3%	40.6%	0	0	0	0
	3	64.0%	93.8%	42.3%	0	0	0	0
35.05	1	78.4%	95.9%	73.9%	166	14	123	303
	2	68.0%	96.0%	62.1%	266	25	193	484
	3	82.3%	94.9%	49.6%	0	0	0	0
35.06	1	60.9%	96.9%	77.6%	0	0	0	0
	2	69.2%	91.6%	59.2%	157	16	111	284
	3	79.9%	92.7%	26.9%	15	1	12	28
35.07	1	70.8%	92.7%	33.6%	460	42	515	1,017
	2	78.1%	90.0%	39.2%	250	22	182	454
35.09	1	85.4%	91.4%	54.5%	132	13	93	238
	2	80.4%	89.8%	49.1%	214	21	154	389
35.10	1	63.7%	95.0%	76.6%	116	12	154	282
	2	81.7%	96.1%	53.9%	235	20	175	430
36.03	1	76.3%	91.5%	27.3%	0	0	0	0
	2	77.8%	91.2%	46.6%	0	0	0	0
TOTAL					2,195	641	2,791	5,627

Supportive Citywide Spatial Analysis to Inform AB 686 Plan Area Analysis

Figures 3-29 through **3-34** below identify the sites to accommodate future housing, as identified in the adequate sites analysis, overlaid on demographic data using AFFH data layers for segregation and integration provided through HCD's AFFH data and mapping resources.

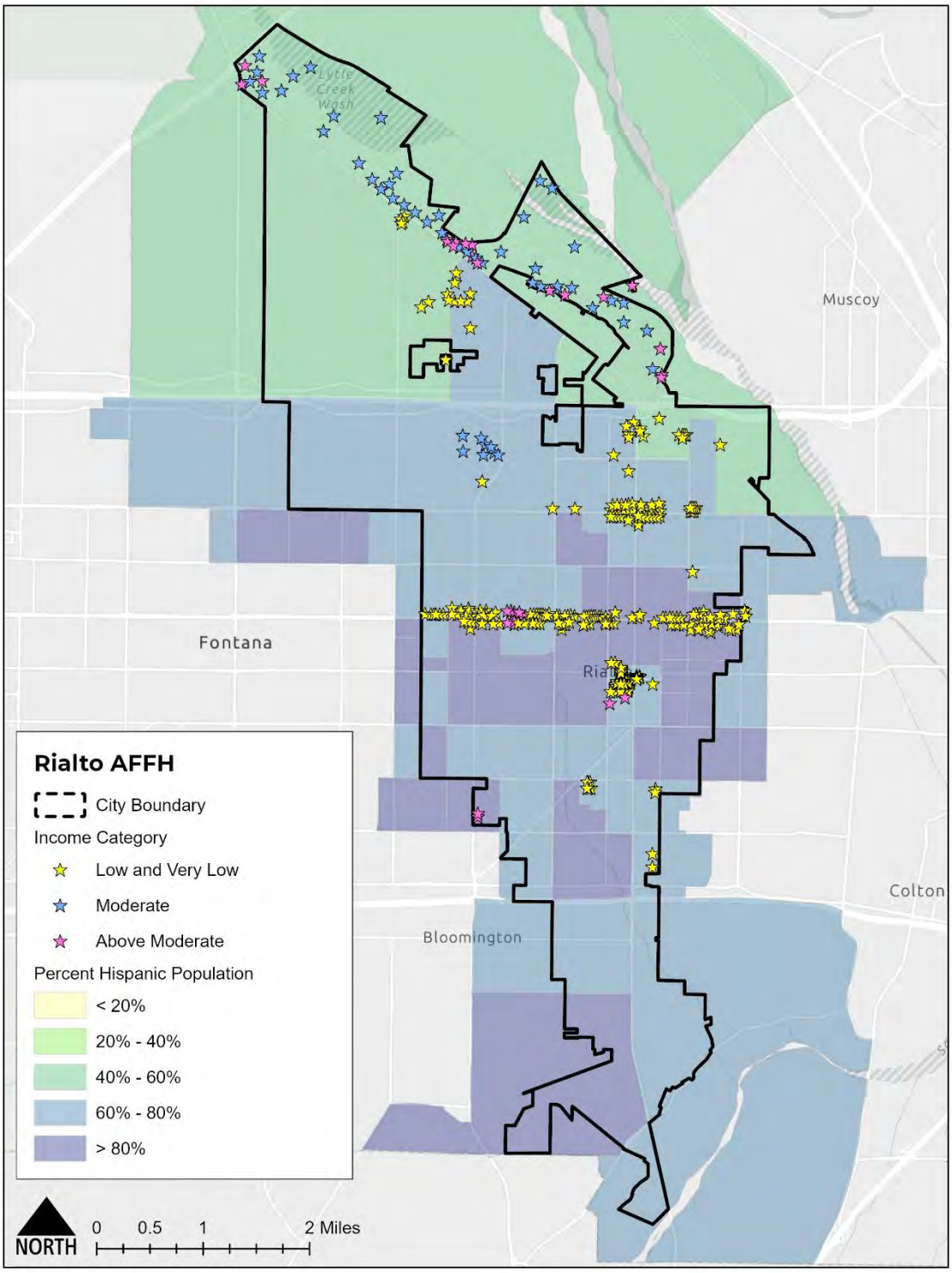
- **Figure 3-29** – Rialto Proposed RHNA Sites, Hispanic/Latino, 2018
- **Figure 3-30** – Rialto Proposed RHNA Sites, Non-White Population 2018
- **Figure 3-31** – Rialto Proposed RHNA Sites, Low and Moderate Income, 2015
- **Figure 3-32** – Rialto Proposed RHNA Sites, R/ECAP Areas
- **Figure 3-33** – Rialto Proposed RHNA Sites, RCAAs
- **Figure 3-34** – Rialto Proposed RHNA Sites, TCAC Opportunity Areas

Figure 3-29 shows the proposed candidate sites to meet the RHNA for Rialto in relation to the location of residents of Hispanic origin. These sites take into consideration access to vital goods, services, and public transportation and are therefore ideal areas for the City to focus much of its future housing growth. It is anticipated that accessory dwelling unit (ADU) growth, including growth for affordable ADUs, will occur in the less dense areas of the community. **Figure 3-29** shows the following findings:

- 79 proposed sites to accommodate the RHNA allocation (totaling 7,049 potential units, or 42% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 40 and 60 percent. Of those units, 376 are proposed as affordable to low and very low incomes.
- 190 proposed sites to accommodate the RHNA allocation (totaling 6,993 potential units, or 42% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 60 and 80 percent. Of those units, 2,881 are proposed as affordable to low and very low incomes.
- 75 proposed sites to accommodate the RHNA allocation (totaling 2,761 potential units, or 16% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic above 80 percent. Of those units, 1,508 are proposed as affordable to low and very low incomes.

Figure 3-29 shows that in general the City has a high Hispanic/Latino population. A majority of sites affordable to lower income households have been identified along the City's central corridor, which shows the highest percentage of Hispanic/Latino population. These sites have been identified in this location as they provide the highest access to transportation and services. Moderate income sites have been identified in the northern region of the City, which reports the lowest percentage of Hispanic/Latino population, as the entitled Specific Plan located in this region permits for lower density residential developments. Transit scores in the City's northern region are currently rated very low. In identifying lower income sites along the City's main corridor, the City seeks to revitalize the area and facilitate the development of mixed income residential projects in conjunction with new community opportunities. Additionally, while sites have been identified as various affordability levels through the candidate sites analysis, housing developers will be encouraged to include affordable components to residential projects throughout the City. **Section 4** includes a number of programs which address fair housing factors, encourage the development of affordable units and mixed income developments, and programs which seek to improve access to opportunities for existing and future residents.

Figure 3-29: Rialto Proposed RHNA Sites, Hispanic/Latino, 2018



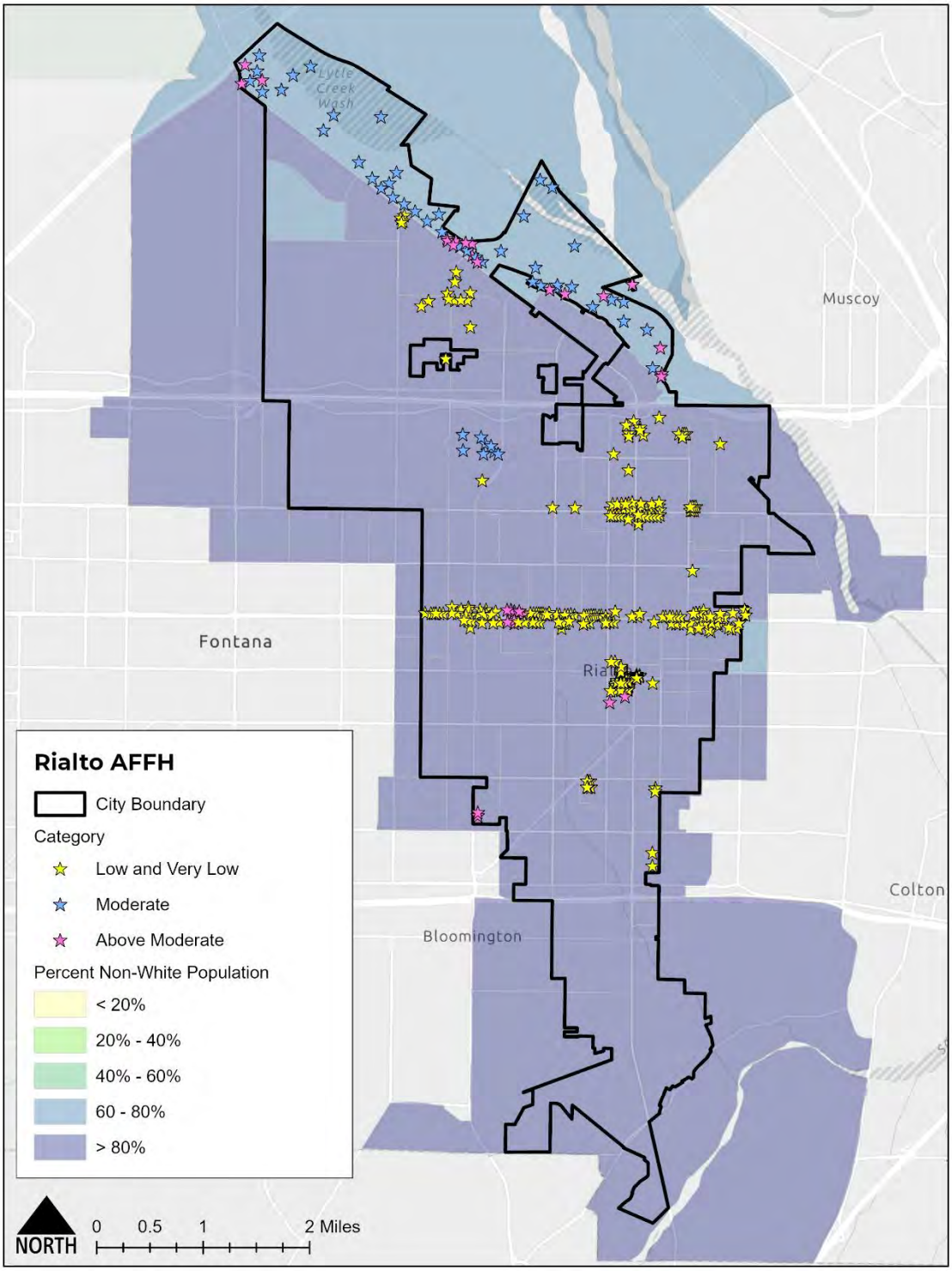
Sources: City of Rialto, HCD AFFH Data Viewer (October 2021)

Figure 3-30 shows the proposed candidate sites to meet the RHNA for Rialto in relation with census data showing the percentage of the population within each block group that is Non-white. **Figure 3-30** shows the following findings:

- 60 proposed sites to accommodate the RHNA allocation (totaling 6367 potential units, or 38% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White between 60 and 80 percent. None are proposed as affordable to low and very low incomes.
- 284 proposed sites to accommodate the RHNA allocation (totaling 10,436 potential units, or 62% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White above 80 percent. Of those units, 4,765 are proposed as affordable to low and very low incomes.

Figure 3-30 shows the City has a very diverse population with most of the City reporting a population that identifies as Non-White of 80 percent or more. The northern portion of the City includes a region that reports 60 to 80 percent Non-White residents; however, this area is currently undeveloped vacant land. An existing Specific Plan currently overlays the region and will result in the development of low to moderate density residential uses. As such, the candidate sites analysis has identified most sites in the northern region as affordable to moderate income households. As the area develops, the City will encourage the development of affordable component to provide for additional opportunities to all economic segments of the community. **Section 4** includes a number of programs which address fair housing factors, encourage the development of affordable units and mixed income developments, and programs which seek to improve access to opportunities for existing and future residents.

Figure 3-30: Rialto Proposed RHNA Sites, Non-White, 2018



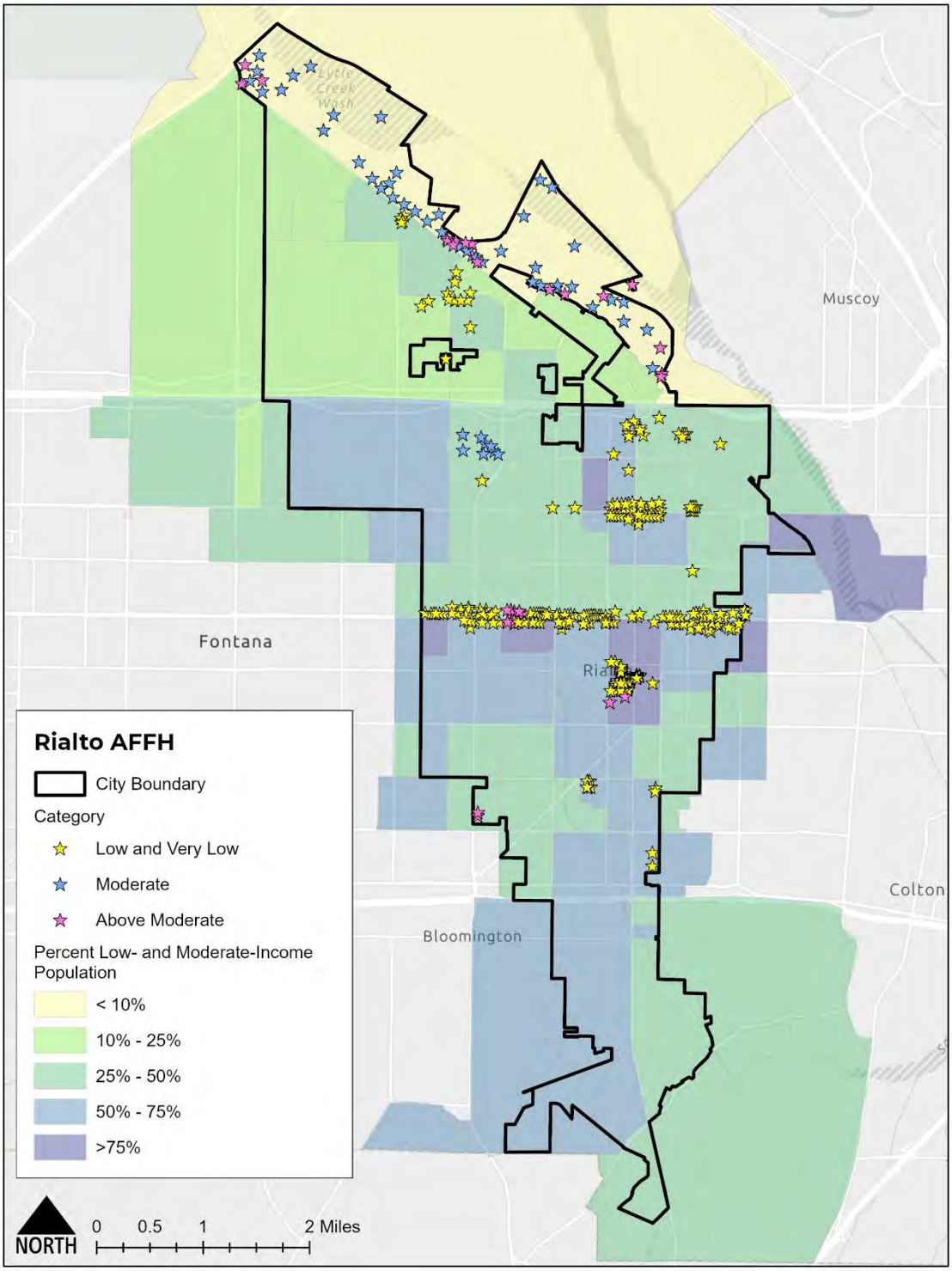
Sources: City of Rialto, HCD AFFH Data Viewer (October 2021)

Figure 3-31 shows location of proposed candidate sites to meet the RHNA for Rialto in comparison with census data showing the percentage of the population within each block group who is categorized as low income or moderate income by the American Community Survey. **Figure 3-31** shows the following findings:

- 60 proposed sites to accommodate the RHNA allocation (totaling 6,367 potential units, or 38% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income below 10 percent. Of those units, none are proposed as affordable to low and very low incomes.
- 7 proposed sites to accommodate the RHNA allocation (totaling 305 potential units, or 2% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income between 10 and 25 percent. Of those units, 169 are proposed as affordable to low and very low incomes.
- 121 proposed sites to accommodate the RHNA allocation (totaling 5,751 potential units, or 34% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income between 25 and 50 percent. Of those units, 2,291 are proposed as affordable to low and very low incomes.
- 82 proposed sites to accommodate the RHNA allocation (totaling 3,526 potential units, or 21% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income between 50 and 75 percent. Of those units, 1,939 are proposed as affordable to low and very low incomes.
- 74 proposed sites to accommodate the RHNA allocation (totaling 854 potential units, or 5% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income above 75 percent. Of those units, 366 are proposed as affordable to low and very low incomes.

Figure 3-31 shows that most sites identified as affordable to lower income households are located in a region that currently has higher percentages of lower income households. These sites were identified along the City's main corridor due to high access to transportation and services. These sites were also identified to facilitate the revitalization of the corridor and mixed-use developments – providing existing and future households with additional economic and community resources. Additionally, the City will encourage the development of affordable component on all residential projects across the City to provide for additional opportunities to all economic segments of the community. **Section 4** includes a number of programs which address fair housing factors, encourage the development of affordable units and mixed income developments, and programs which seek to improve access to opportunities for existing and future residents.

Figure 3-31: Rialto Proposed RHNA Sites, Low- and Moderate-Income Households 2015



Sources: City of Rialto, HCD AFFH Data Viewer (October 2021)

Figure 3-32 shows proposed candidate sites to meet RHNA for Rialto in relation with data showing R/ECAP areas within the City. R/ECAPs are racially or ethnically concentrated areas of poverty; they are marked in red hatchings. The goal of the AB 686 analysis is to analyze how the sites identified to accommodate the RHNA allocation may exacerbate or mitigate existing fair housing issues. **Figure 3-32** shows there are no R/ECAPs located within the City of Rialto; therefore, no proposed candidate sites are located in a R/ECAP.

Figure 3-33 shows proposed candidate sites to meet RHNA for Rialto in relation with data showing RCAA areas within the City. RCAAs are racially or ethnically concentrated areas of affluence; there are identified as areas with a White Non-Hispanic population greater than 80 percent and a median household income greater than $125,000. **Figure 3-33** shows there are no RCAAs located within the City of Rialto; therefore, no proposed candidate sites are located in an RCAA.

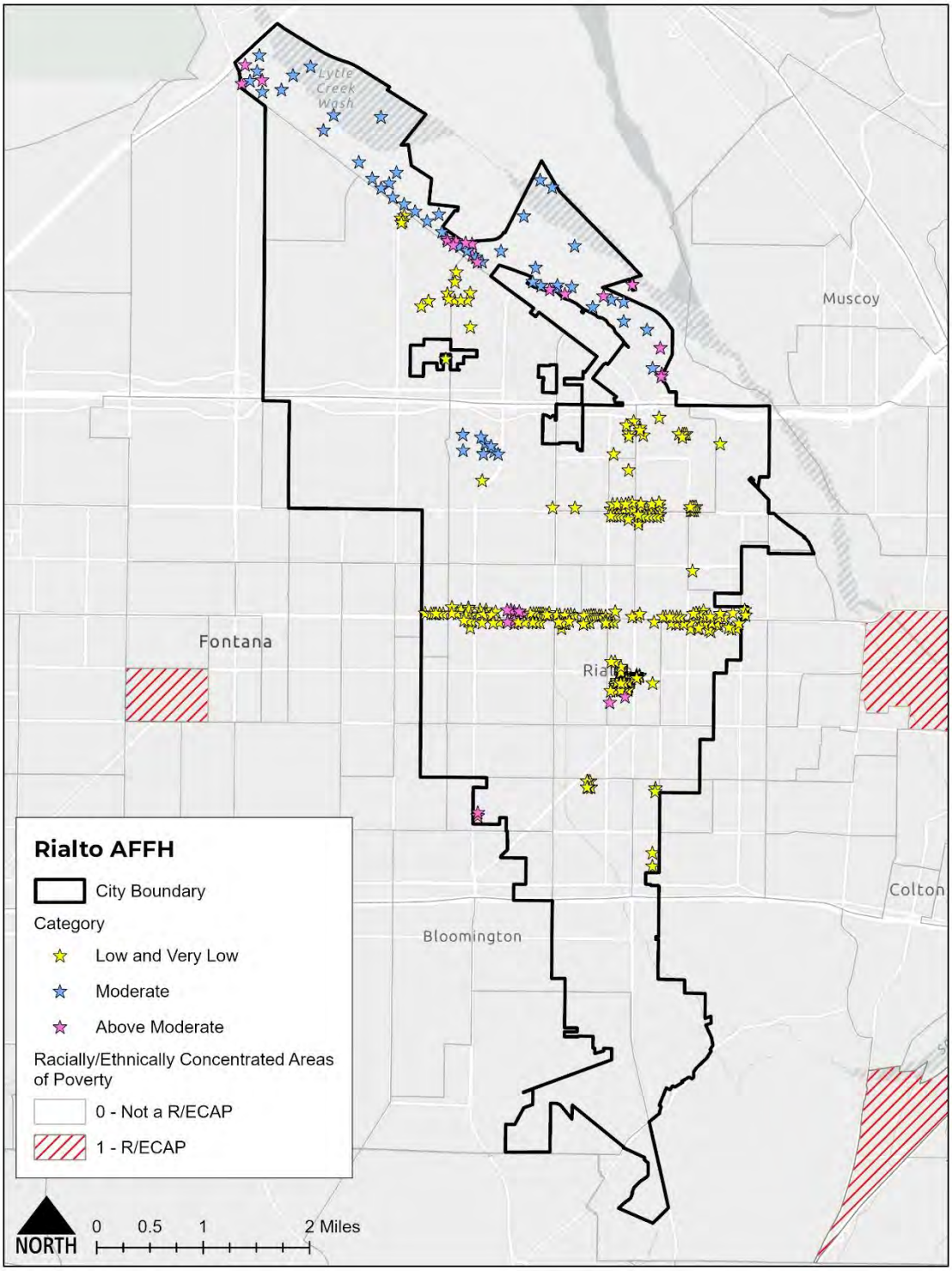
Figure 3-34 shows proposed candidate sites to meet RHNA for Rialto in relation with the TCAC/HCD Opportunity areas within the City. TCAC is the California Tax Credit Allocation Committee/Housing and Community Development Opportunity Area Maps which show how resources are spatially distributed throughout the City.

Figure 3-32 shows the following findings:

- 161proposed sites to accommodate the RHNA allocation (totaling 6,383 units, including 3411 units affordable to low and very low-income households) are located within Low Resource areas of the City.
- 33 proposed sites to accommodate the RHNA allocation (totaling 2,243 units, including 463 units affordable to low and very low-income households) are located within Moderate Resource areas of the City.
- 67 proposed sites to accommodate the RHNA allocation (totaling 6,800 units, including 239 units affordable to low and very low-income households) are located within High Resource areas of the City.
- 81 proposed sites to accommodate the RHNA allocation (totaling 1,284 units, including 601 units affordable to low and very low-income households) are located within High Segregation and Poverty areas of the City.

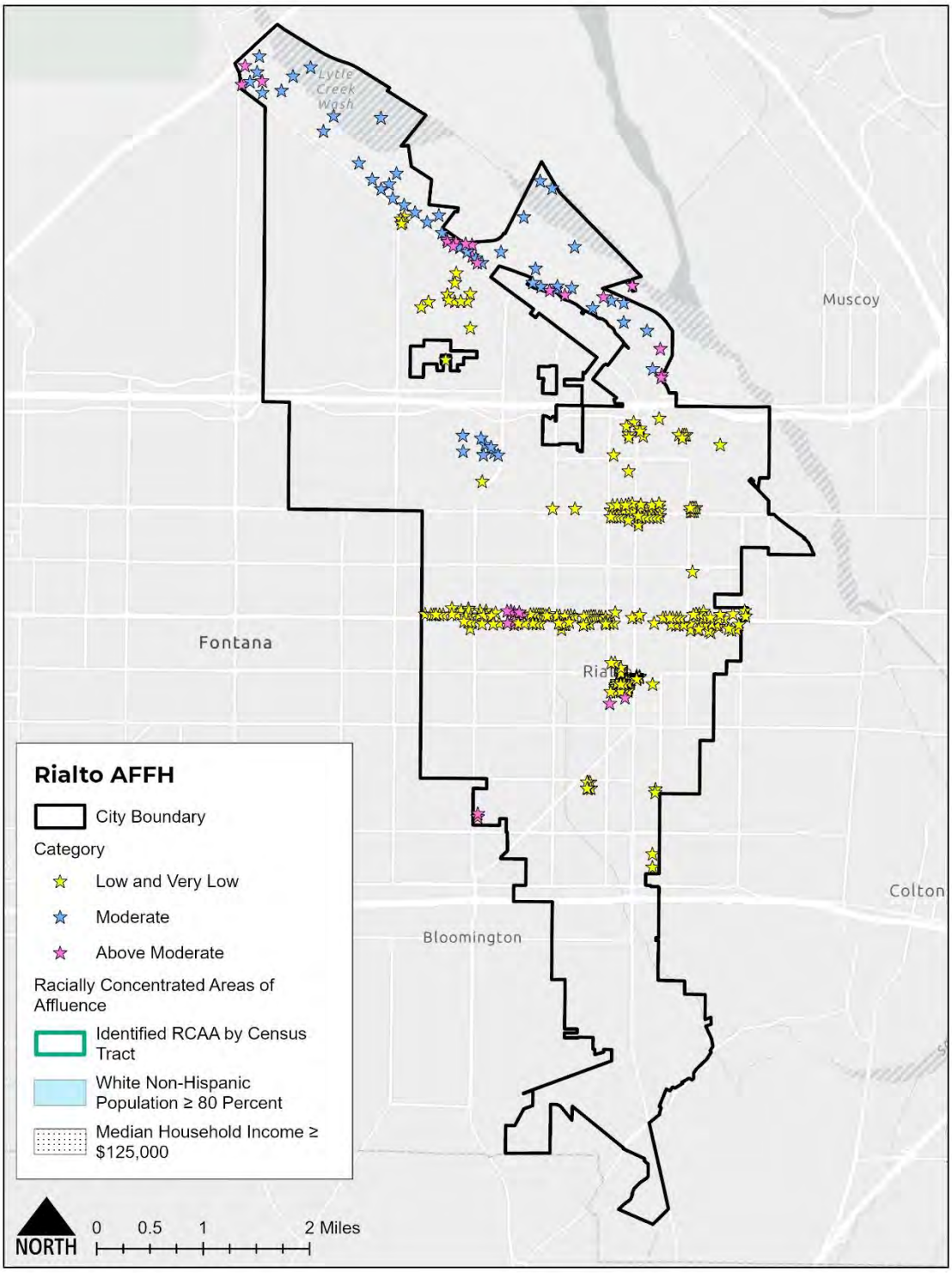
While **Figure 3-34** shows most lower income units located in low resource and high segregation and poverty areas of the City, these sites were selected due to propensity for residential development near public transportation and services among other factors. Additionally, the City will encourage the development of residential uses in conjunction with commercial and economic opportunities, as well as community services, to revitalize the area and improve opportunities for existing residents. The City will encourage the development of affordable components on all residential projects across the City to provide for additional opportunities to all economic segments of the community. **Section 4** includes a number of programs which address fair housing factors, encourage the development of affordable units and mixed income developments, and programs which seek to improve access to opportunities for existing and future residents.

Figure 3-32: Rialto Proposed RHNA Sites, R/ECAP Areas



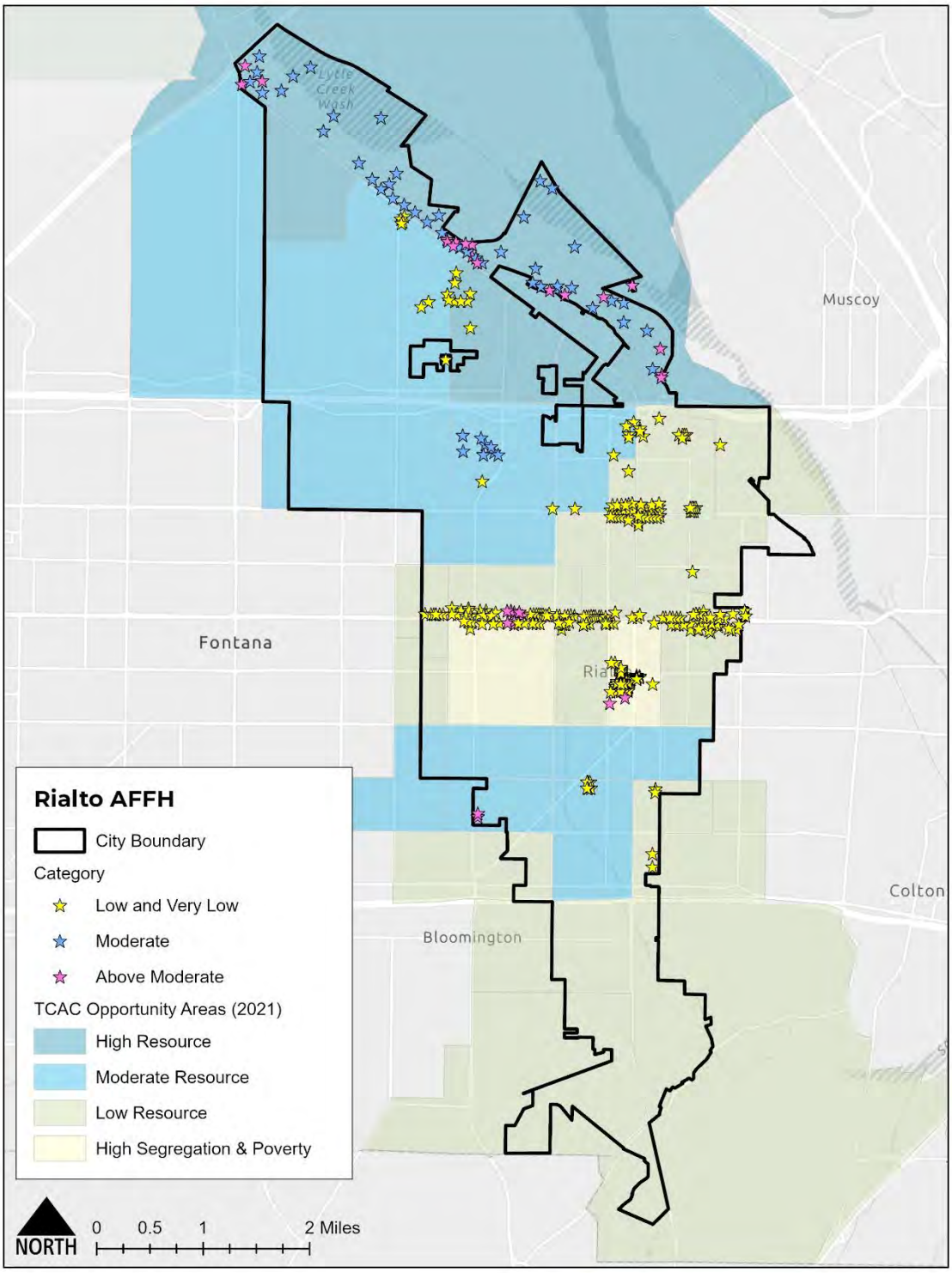
Sources: City of Rialto, HCD AFFH Data Viewer (October 2021)

Figure 3-33: Rialto Proposed RHNA Sites, RCAA



Sources: City of Rialto, HCD AFFH Data Viewer (October 2021)

Figure 3-34: Rialto Proposed RHNA Sites, TCAC Opportunity Areas



Sources: City of Rialto, HCD AFFH Data Viewer (October 2021)

Candidate Housing Sites

As noted above, the City has identified candidate sites to accommodate future housing growth based on existing access to community resources, services, and public transportation, while also considering the availability of land, developer interest, and general likelihood the sites would develop residential uses over the next eight years. Throughout the sites selection process, the City prioritized locating affordable housing in areas that have existing resources to facilitate access. The result of this is the location of a majority of lower-income candidate sites along Foothill Boulevard and in Rialto's Downtown. This area is near bus stations, grocery stores, employment opportunities, and City resources. The City anticipates seeing a growth in diversity of housing types in single-family neighborhoods as pipeline projects move forward and as ADUs and Senate Bill 9 (SB 9) units are constructed. In addition, the City has allocated $97 million dollars towards new and existing infrastructure as part of the Capital Improvement Plan for general improvements, public art, parks, and streets.

Sites identified as part of the Adequate Sites Analysis along Foothill Boulevard and in the Downtown Rialto area include pipeline projects and units permitted based on existing capacity through the Central Area Specific Plan. Sites along Foothill Boulevard are adjacent to public transportation stops, providing close and convenient access to public transportation into the entire San Bernardino area.

The region offers a number of options for grocery stores (Food 4 Less, Aldi, Cardenas Market, Stater Bros Market, Superior Grocers, and Walmart Neighborhood Market) within walking distance from existing residential developments. These allow for convenient access to essential needs, as well as create opportunities for employment within walking distance to and from the candidate sites.

Overall, Foothill Boulevard and the Downtown Rialto area are deemed to be an ideal location for housing types of all incomes. The area offers a great variety of resources and opportunities in very close proximity and transit stops for accessing other parts of the region. The allocation of low-income sites in the area will not exacerbate existing conditions and instead, are meant to facilitate growth and social mobility in the region. Access to opportunities and resources will help lower income residents as well as residents of all incomes.

A majority of moderate and above moderate sites have been allocated in the northernmost region of the City. The sites were strategically placed in that area because an existing Specific Plan currently overlays the region and will result in the development of low to moderate density residential uses. As such, the candidate sites analysis has identified most sites in the northern region as affordable to moderate income households. As the area develops, the City will encourage the development of affordable units to provide for additional opportunities to all economic segments of the community. The City has identified 15 candidates sites with an allocation of low-income sites in the northernmost region.

Fair Housing Assumptions on Candidate Sites

To create housing opportunities that affirmatively further fair housing, the City evaluated housing opportunities based on the need to distribute opportunity to housing throughout the City. Several factors influenced the location of sites to accommodate future housing growth. These factors included:

- Existing Single-Family development that is generally stable and will not change significantly in the planning period
- Future opportunities focused on introducing mixed income housing opportunity in areas that can accommodate higher density development.
- Maximizing the reuse and redevelopment of aging, underutilized corridors
- Maximizing areas with highest level of vacant land with higher density opportunity

To affirmatively further fair housing through the identification of opportunity sites to accommodate a range of affordability levels, the City's analysis considered the following factors:

- Most feasible equitable distribution of opportunities to all economic segments
- Maximizing geographic equity in housing opportunity
- Focusing opportunity in areas where services are available or will be available
- Introducing residential affordability as a positive catalyst for change
- Reducing or eliminating economic mobility constraints through housing choice

Foothill Boulevard - Of the seven opportunity areas to accommodate growth, the majority of opportunity is focused on the Foothill Boulevard corridor (2,443 Lower income, 227 Moderate Income and 1,767 Above Moderate sites). Foothill Boulevard Corridor is a three-mile corridor that functions as an important regional and inter-regional corridor. The area has transitioned over time from more regional serving uses, such as services stations, motels, fast food, etc. to more local-serving uses. This has provided an opportunity to transition a traditional regional corridor into a more productive, locally serving activity center with a mature transportation infrastructure. Foothill Boulevard runs the entire length of city limits and is the primary local service east/west spine of the City. This three-mile corridor has significant favorable attributes, and is the primary opportunity area in the City as evidenced by the following Key factors:

- Local capital improvements and investments in the Corridor
- Mix of uses to enhance mixed income opportunities for jobs and housing
- Strong transportation connections locally and regionally
- Opportunity to enhance economic opportunity and job creation
- Scale of diversity of opportunity in sites (size, location, availability, etc.)

This provides the highest level of access to the community. It is also the area with high access to local jobs to serve and employ the local community. This area is the strongest opportunity to expand mobility, choice and reduce segregation.

North Riverside – This area is adjacent to the 210-Freeway Corridor in the northern section of the City. The area provides 369 units for lower income, 40 moderate income and 264 above moderate income. Densities permitted may also increase lower income opportunity. Key factors for utilizing this site are:

- Location to local and regional transportation corridors
- Mixed income opportunity in a historically single-family area

- Access to job, retail, and educational opportunities
- Vacant, available land
- Highly underutilized parcels, with minimal physical structures
- Size of parcels conducive to development of larger-scale Multiple family housing

Gateway Specific Plan – This area is located in the southern area of the City, with an assumed opportunity for 307 units of lower income, 28 units of moderate income and 223 units of above moderate income. This area consists of vacant parcels and provides the highest level of opportunity due to the following factors:

- Available vacant land
- Strong opportunity to connect with services including the Senior Center, medical services, retail and job opportunities
- Addition of housing to complement existing uses and activities
- Access to local and regional transportation and transit
- Enhanced housing opportunity that will complement existing job opportunities
- Complement existing predominance of single-family development in the surrounding area

Rialto Central Area Specific Plan – This area is located in the core downtown area of Rialto, with an assumed opportunity to accommodate 189 units of lower income, 8 units of moderate income and 153 units of above moderate income housing. This area consists of many vacant parcels and provides high level of redevelopment potential due to the following factors:

- Adjacency to Civic Center and city services
- Walking distance to downtown retail and job opportunities
- Walking distance to Metrolink commuter rail station
- Availability of existing infrastructure to accommodate growth
- Established pedestrian scaled, neighborhood environment
- Adjacent mix of housing opportunity from single-family to affordable units

Baseline Parcels and Baseline Shopping Center – This area is in north central Rialto and provides opportunity to accommodate 832 lower income units, 75 moderate income units and 609 above moderate income units. This area consists primarily of existing corridor retail development with a propensity to redevelopment due to the following factors:

- Adjacency to educational opportunities
- Highly underutilized parcels with significant parking fields
- Underperforming retail development
- Expressed interest in opportunity to redevelop the area for residential uses
- Recent redevelopment to residential on adjacent parcels

Housing Opportunity Overlay – This area has the assumed opportunity to accommodate 583 lower income units, 50 moderate income units and 420 above moderate income units. This area is located on both sides of the 210 Foothill Freeway and was selected due to the following factors:

- Vicinity of major retail, services and job uses
- Availability of existing infrastructure to accommodate growth
- Access to local and regional transit.
- Vacant, available land

Affect and Impact of Sites to Existing Patterns

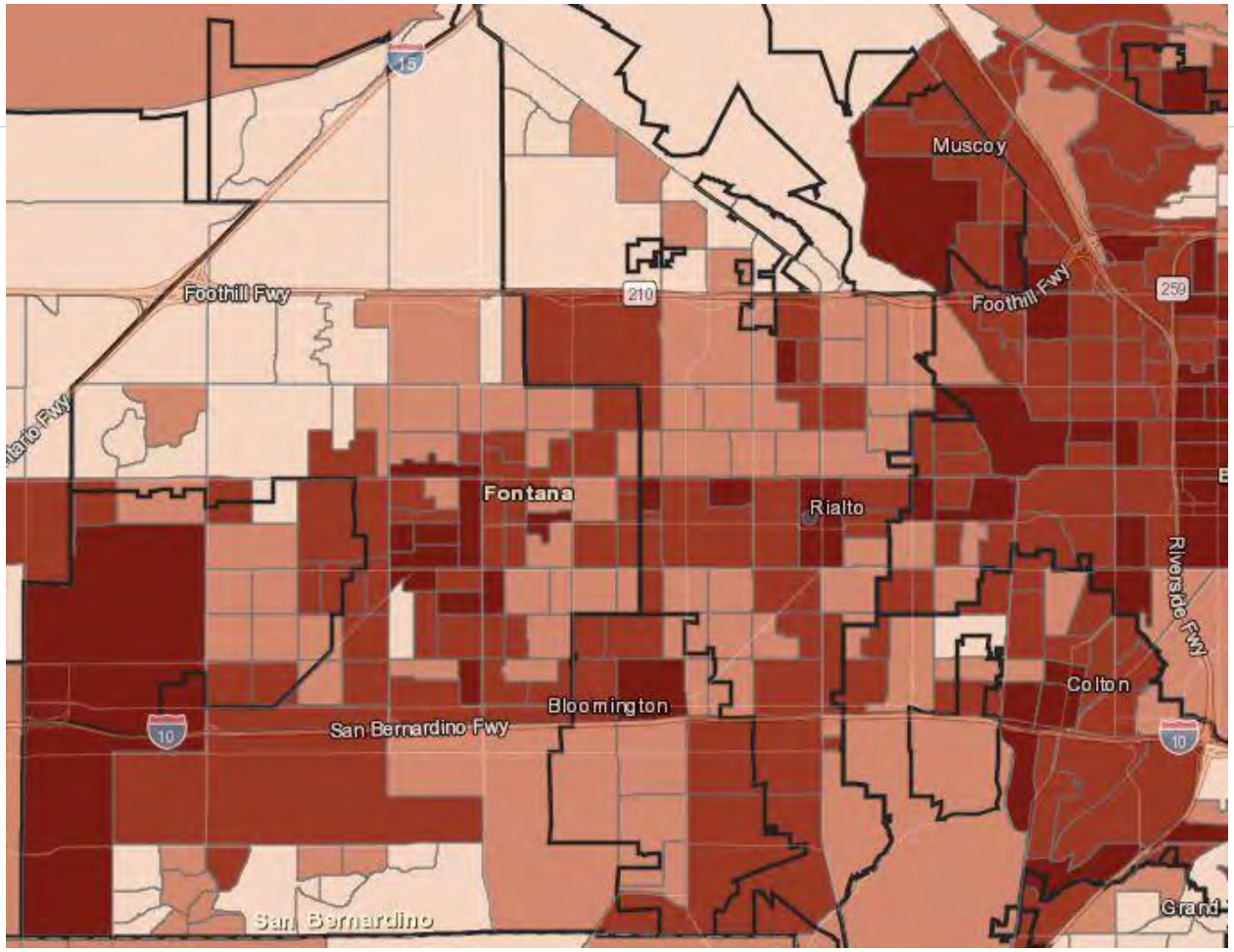
According to the TCAC Opportunity map, as shown below, all of Rialto is rated "low" or "moderate resource, with the vast majority of moderate resource area to the north of the 210 freeway. The city seeks to improve conditions by utilization of current sites by:

- Locating housing opportunity for lower income sites where zoning is flexible to provide service and job opportunities
- Locating housing opportunity in areas providing a higher level of existing transportation options (transit, etc.)
- Locating housing opportunity in areas experiencing revitalization and reuse
- Locating housing where there is a demonstrated propensity to redevelop to higher density residential use

The existing development pattern will be improved through the reuse and revitalization of existing development sites which traditionally has shifted from agriculture to corridor commercial to mixed use, urbanized living. The areas identified for housing will not upset existing community character of residential neighborhoods and improve existing blighted/underutilized conditions.

Figure 3-35 shows the location of the residents by income. Generally, the areas to the south of Foothill Boulevard contain higher incidences of lower income residents. Areas to the north of Foothill Boulevard generally have a much lower incidence of lower income. Locating more opportunity for lower, moderate and above moderate income provides an opportunity to integrate these neighborhoods and reduce the apparent division that the Foothill corridor creates. Locating residential opportunity in this area affordable to lower income residents will contribute to greater mobility in the area and improve existing single family neighborhood stability.

Figure 3-35: Percentage of Low to Moderate income Population



Growth in the City is generally limited to infill and reuse of existing non-residential uses. The areas with higher concentration of affordable opportunity (along Foothill/Route 66) are a reasonable assumption due to the following factors.

The areas adjacent to the corridor are primarily single-family, neighborhood developments. There is very limited opportunity to transition these single-family neighborhoods to more intensive development capacity other than through ADU and JADU development. On the other hand, development along the Foothill/Route 66 and Riverside Avenue corridors provides a host of underutilized, aging uses that can be readily changed to residential uses. These areas remain the only areas that can sensibly absorb the growth needs of the community, while preserving community integrity and integrating various housing affordability in an urban, mixed use environment. Future assumptions of affordability in these areas seek to have a balance of lower income and market rate units to facilitate mobility and diversity of housing choice.

9. Analysis of Fair Housing Priorities and Goals

Section 4: Housing Plan of the Housing Element provides various Goals and Programs Actions that seek to "Promote equal opportunity for all residents to reside in the housing of their choice." Specific Policies and Programs include the following:

Policy 5.1: Continue to enforce fair housing laws prohibiting arbitrary discrimination in the building, financing, selling, or renting of housing based on race, religion, family status, national origin, disability, or other protected class.

Policy 5.2: Ensure that residents are aware of their rights and responsibilities regarding fair housing.

Policy 5.3: Continue to cooperate with the Inland Mediation Board to enforce fair housing laws and provide fair housing education services.

Policy 5.4: Affirmatively Further Fair Housing in Rialto.

- Housing Program 5A: Affirmatively Furthering Fair Housing
- Housing Program 5B: Fair Housing Services
- Housing Program 5C: Reasonable Accommodation
- Housing Program 5D: Emergency Shelters, Transitional and Supportive Housing
- Housing Program 5E: Supportive Housing / Low Barrier Navigation Centers
- Housing Program 5F: Housing for Persons with Developmental Disabilities
- Housing Program 5G: Agricultural Employee and Farmworker Housing
- Housing Program 5H: Residential Care Facilities

D. Housing Resources

1. Regional Housing Needs Allocation

This section of the Housing Element provides an overview of the resources available to the City to meet their Regional Housing Needs Allocation (RHNA).

Residential Sites Inventory

Appendix B of the Housing Element includes the required site analysis tables and site information for the vacant and non-vacant properties to meet the City's RHNA need through the 2021-2029 planning period. The following discussions summarize the City's site inventory and adequate sites identification strategy.

Above Moderate- and Moderate-Income Sites

For the 2021-2029 planning period, the City's RHNA allocation is 1,371 for moderate-income sites and 3,477 for above moderate-income sites. Utilizing the City of Rialto's existing residentially zoned land, projected ADU assumptions, and entitled, private specific plans, the City can fully accommodate the moderate- and above moderate-income RHNA allocations. A breakdown of each strategy and its total number of sites is provided in **Appendix B**.

Analysis of the City's Existing Capacity and Zoning

The Housing Element must demonstrate the City's ability to accommodate the RHNA either through the production or the availability of properly zoned land that can accommodate additional growth. The City of Rialto is able to accommodate all of its moderate- and above moderate-income RHNA need through available land with existing zoning classifications that permit residential as a primary use, existing entitled specific plans, and anticipated development of ADUs. **Appendix B** of this Housing Element contains a list and description of the sites designated to meet the City's moderate- and above moderate-income need. **Table 3-47** below summarizes the capacity of the sites by specific plan and income category which can accommodate 1,052 moderate-income and 6,519 above moderate-income housing units – these amounts exceed the City's 2021-2029 RHNA allocations.

Table 3-47 Residential Capacity for Moderate and Above Moderate-Income Sites

	Moderate-Income	Above Moderate-Income
Accessory Dwelling Unit Projection	26	6
Entitled, Private Specific Plans		
Lytle Creek Ranch Specific Plan	621	5,638
Renaissance Specific Plan	405	875
TOTAL	1,052	6,519

Reasonable Capacity Assumptions

Reasonable capacity for sites identified to meet the City's moderate and above moderate need was calculated based on a number of factors, including existing zoning requirements, vacancy and total number of units entitled, and the assumed density based on the City's development history. Per HCD guidance, the City has assumed a potential development density of 80 percent of the maximum permitted where recent development history in the zoning designation is not present. Potential constraints to the full redevelopment of the parcel, to the extent they are known, such as environmentally sensitive areas, were considered and deductions were made where those factors decreased the net buildable area of a parcel. For example, if a parcel contained a large slope on one side, the buildable acreage was assumed at 50% of the gross parcel acreage. These constraints are reflected in the tables within **Appendix B**.

Table 3-47 above identifies the specific plans where remaining capacity is used to accommodate the moderate and above moderate-income RHNA allocations; additional information regarding capacity on each specific plan is detail in **Appendix B**.

Accessory Dwelling Unit Production

One of the proposed methods for meeting the City's moderate and above moderate RHNA is through the promotion and development of accessory dwelling units (ADUs). A number of State Assembly and Senate Bills were passed in 2019 that promote and remove barriers that may inhibit the development of ADUs within communities. The following is a summary of those bills:

- AB 68 and 881

  - Prohibit minimum lot size requirements
  - Cap setback requirements at 4', increasing the size and location opportunities for ADUs
  - Prohibit the application of lot coverage, FAR, or open space requirements that would prevent an 800 square foot ADU from being developed on a lot
  - Remove the need for replacement parking when converting an existing garage to an ADU
  - Limit local discretion in establishing min and max unit size requirements
  - Mandate a 60-day review period for ADU applications through a non-discretionary process
- SB 13
  - Prohibit owner-occupancy requirements for 5 years
  - Reduce impact fees applicable to ADUs
  - Provide a program for homeowners to delay compliance with certain building code requirements that do not relate to health and safety
- AB 670
  - Prohibits Homeowner's Associations (HOAs) from barring ADUs

These bills, as well as other significant legislation relating to ADUs creates a development environment that is likely to increase the number of ADUs developed within Rialto over the 2021-2029 planning period.

HCD has supported a strategy for estimating future development of ADUs in the City, therefore by multiplying the average ADU development from 2018-2021 by 1.5, the City of Rialto assumes a total of 72 ADUs to be developed from 2021-2029. Utilizing the Southern California Association of Governments (SCAG) approved ADU affordability assumptions, 40 ADUs will be allocated to the low and very low income RHNA, 26 will be allocated to the City's moderate income RHNA and 6 will be allocated to the above moderate. A detailed outline of the Affordability Analysis, as approved by HCD, is available in **Appendix B** of the Housing Element.

The City of Rialto estimates an increase of ADU production through both new residential development and individual homeowners. The City believes that ADUs provide 1) increased housing opportunity for a variety of persons in Rialto and 2) an option for seniors in multigenerational households to age in place and remain in the City. Through the Housing Element, Rialto commits to creating an ADU tracking program and performing a mid-cycle assessment of their ADU development performance. As stated in HCD guidance, the City may use other justifiable analysis to calculate anticipated ADU performance. A program detailing this Program is in **Section 4: Housing Plan**.

Sites Suitable for Lower Income Housing

The State Department of Housing and Community Development (HCD) has identified 30 dwelling units an acre as the default density, or feasible density for accommodating low- and very low-income housing. Utilizing the City of Rialto's existing residentially zoned land and ADU projected assumptions the City can accommodate a portion of the very low- and low-income housing units, as summarized in **Table 3-48**.

Table 3-48: Residential Capacity for Very Low- and Low-Income Sites	
	Very Low- and Low-Income
Accessory Dwelling Unit Projection	40
5th Cycle Sites	0
Entitled, Private Specific Plans	
Lytle Creek Ranch Specific Plan	0
Renaissance Specific Plan	0
TOTAL	40

Vacant Parcels

Recent HCD guidance states that at least 50 percent of the City's low- and very low-RHNA allocation should be met on vacant sites. If the City cannot accommodate 50 percent of the units on vacant land, it is considered an impediment to the development of affordable housing and further analysis should prove viability of redevelopment of non-vacant sites. The City has accommodated over 50 percent of all lower-income units on vacant parcels therefore, it can be assumed that existing uses are not an impediment to additional residential development in the planning period.

Up-Zone/Rezone Strategy to Accommodate the Remaining Very Low-/Low-RHNA Allocation

After using residentially zoned land, specific plans, and ADU assumptions, the City nets 3,384 units below the 6th Cycle RHNA allocation of 3,424 combined very low- and low-income units. To accommodate the remaining RHNA allocation, the City will need to rezone and upzone sites, or other similar policy strategies. The strategies identified seven opportunity areas are detailed in **Appendix B** of this document.

Regional Housing Needs Allocation

Future Housing Needs

Future housing need refers to the share of the regional housing need that has been allocated to the City. The State Department of Housing and Community Development (HCD) supplies a regional housing goal number to the Southern California Association of Governments (SCAG). SCAG is then mandated to allocate the housing goal to city and county jurisdictions in the region through a RHNA Plan. In allocating the region's future housing needs to jurisdictions, SCAG is required to take the following factors into consideration pursuant to Section 65584 of the State Government Code:

- Market demand for housing;
- Employment opportunities;
- Availability of suitable sites and public facilities;
- Commuting patterns;
- Type and tenure of housing;
- Loss of units in assisted housing developments;
- Over-concentration of lower income households; and
- Geological and topographical constraints.

HCD, through a determination process, allocates units to each region across California. It is then up to each region to determine a methodology and process for allocating units to each jurisdiction within that region. SCAG adopted its final Regional Housing Needs Allocation (RHNA Plan) in March 2021. This RHNA covers an 8-year planning period (starting in 2021) and addresses housing issues that are related to future growth in the region. The RHNA allocates to each city and county a "fair share" of the region's projected housing needs by household income group. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the Southern California region, so that every community provides an opportunity for a mix of housing for all economic segments.

Rialto's share of the SCAG regional growth allocation is 8,272 new units for the current planning period (2021-2029). **Table 3-49** indicates the City's RHNA needs for the stated planning period.

Table 3-49: City of Rialto's RHNA Allocation for 2021-2029

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low (30% or less)	1,109	13%
Very Low (31 to 50%)[1]	1,109	13%
Low (51 to 80%)	1,206	15%
Moderate (81% to 120%)	1,371	17%
Above Moderate (Over 120%)	3,477	42%
Total	8,272	100%

Note 1: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data.

Summary of Sites Inventory and RHNA Obligations

The data summarized in **Table 3-50** below and in **Appendix B** shows the City of Rialto's ability to meet the 8,272 RHNA allocation in full capacity with an 8,726-unit buffer. Along with identifying appropriate sites to meet the current and future housing needs, the City has established a Housing Plan to support its efforts in providing housing opportunities for all income levels in Rialto.

Table 3-50: Summary of RHNA Status and Sites Inventory					
	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2021-2029)	2,218	1,206	1,371	3,477	8,272
Pipeline Projects	0	0	0	516	516
Units Constructed/Issued Permits in Projection Period (Begins June 31, 2021)	0	0	0	285	285
Remaining Unmet RHNA	**2,218**	**1,206**	**1,371**	**2,676**	**7,471**
Existing Zoning – Unit Capacity					
Accessory Dwelling Unit Projection	40		26	6	72
Entitled, Private Specific Plans					
Lytle Creek Ranch Specific Plan	0		621	5,638	6,259
Renaissance Specific Plan	0		405	874	1,279
Rezone Strategies – Unit Capacity					
Opportunity Areas with Rezone/Upzone Programs*					
1 - Foothill Boulevard Specific Plan	2,443		227	1,767	4,437
2 - North Riverside Avenue	369		40	264	673
3 - Gateway Specific Plan	307		28	223	558
4 - Rialto Central Area Specific Plan	189		8	153	350
5 - Baseline Parcels	88		5	70	163
6 - Baseline Shopping Center	744		70	539	1,353
7 – Housing Opportunity Overlay	583		50	420	1,053
Total Potential Development Capacity	**4,723**		**1,480**	**9,954**	**16,197**
Sites Surplus/Shortfall (%)	39%		8%	186%	96%
Sites Surplus/Shortfall (#)	1,339		109	7,278	8,726

E. Financial Resources

Providing an adequate supply of decent and affordable housing requires funding from various sources, the City has access to the following funding sources.

1. Section 8 Housing Choice Voucher

The Section 8 Housing Choice Voucher program is a Federal government program to assist very low-income families, the elderly, and the disabled with rent subsidy payments in privately owned rental housing units. Section 8 participants are able to choose any housing that meets the requirements of the program and are not limited to units located within subsidized housing projects. They typically pay 30 to 40 percent of their income for rent and utilities. The Housing Authority of the County of San Bernardino administers Section 8 Housing Choice vouchers within the City of Rialto. In 2020, the County assisted 10,508 homes with vouchers, including 355 residents in Rialto through the Section 8 Program.

Community Development Block Grants (CDBG)

The Community Development Block Grant (CDBG) program provides annual grants on a formula basis to cities to develop viable urban communities by providing a suitable living environment and by expanding economic opportunities, principally for low- and moderate-income persons (up to 80 percent AMI). CDBG funds can be used for a wide array of activities, including:

- Housing rehabilitation;
- Lead-based paint screening and abatement;
- Acquisition of buildings and land;
- Construction or rehabilitation of public facilities and infrastructure; and
- Public services for low-income households and those with special needs.

Each year, the City of Rialto receives Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development. The City Administration is responsible for administering these funds. These funds must be used to develop viable communities by promoting integrated approaches that provide items such as decent housing, a suitable living environment, and expand economic opportunities for low- and moderate-income persons.

Investment of CDBG funds in the community is guided by the City's Five-Year Consolidated Plan that identifies the housing, community, and economic development needs of the community, the resources available, and strategies to address identified needs. Each Annual Action Plan describes the activities to be undertaken using CDBG funds to address Consolidated Plan strategies. Subsequent to each program year, the City prepares a Consolidated Annual Performance and Evaluation report detailing the results of CDBG activities.

HOME Investment Partnership Program (HOME)

The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for households with incomes not exceeding 80-percent of area median income. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used

for activities that promote affordable rental housing and homeownership by low-income households. The City of Rialto does not currently report receiving HOME funds.

Local Early Action Planning (LEAP) Grants

SB2 Grant

To supplement the cost of the City's effort to update the streamlining process of affordable housing, the City has been awarded an SB 2 Planning Grant Program grant from HCD. The SB 2 program includes improvements to expedite local planning processes. In 2020, the City received $310,000 from the SB 2 Grant. The funding of the program is to address California's critical housing needs by using award amounts to accelerate housing production by streamlining the approval of affordable housing and promoting development consistent with the State's planning priorities, among other related activities.

LEAP Grant

The City of Rialto applied for and received a total of $500,000 from the California Department of Housing and Community Development (HCD). LEAP Grants provide funding opportunities for jurisdictions to update their planning documents and implement process improvements that will facilitate or accelerate housing production to meet the 6th Cycle Regional Housing Needs Assessment (RHNA).

2. Energy Conservation

The primary uses of energy in urban areas are for transportation lighting, water heating, and space heating and cooling. The high cost of energy demands that efforts be taken to reduce or minimize the overall level of urban energy consumption. Energy conservation is important in preserving non-renewable fuels to ensure that these resources are available for use by future generations. There are also a number of benefits associated with energy conservation including improved air quality and lower energy costs.

Title 24

The City abides by the Title 24 standards as mandated by the State. Title 24 establishes energy efficiency standards for residential and nonresidential buildings (new structures and additions) to reduce energy consumption. The standards are updated every three years to achieve greater efficiency and reach for new goals.

Energy Use and Providers

Southern California Gas Company (SCG) provides natural gas service for the City. Natural gas is a "fossil fuel" and is a non-renewable resource. Most of the major natural gas transmission pipelines within the City are owned and operated by SCG. SCG has the capacity and resources to deliver gas except in certain situations that are noted in state law. As development occurs, SCG will continue to extend its service to accommodate development and supply the necessary gas lines. Electricity is provided on an as-needed basis to customers within existing structures in the City. Southern California Edison Company (SCE) is the distribution provider for electricity in Rialto. Every year SCE expands and improves existing facilities according to demand.

Utility companies serving Rialto offer programs to promote efficient energy use and assist lower-income customers. Southern California Edison participates in the Low-Income Energy Efficiency program to help

homeowners and renters conserve energy and control costs. Eligible customers receive no-cost weatherization, including attic insulation, energy efficient refrigerators, energy-efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration. Edison also participates in the California Alternate Rates for Energy program, which provides a 15 percent discount on electric bills for low-income customers.

Section 4

Housing Plan

Housing Plan

The Housing Plan describes the City of Rialto's 2021-2029 housing policy programs. The Housing Plan describes the specific housing-related goals, policies, and programs the City will undertake during the planning period. The Plan aims to provide additional housing opportunities, remove governmental constraints to affordable housing, improve the condition of existing housing, and provide equal housing opportunities for all current and future residents of Rialto.

These goals, policies, and programs were developed based on a review of the City's 5th Cycle (2014-2021) Housing Element; input from community members, stakeholders, and decision-makers; requirements of new State law; and analysis provided in the Community Profile, Constraints, Resources, and Fair Housing sections of this Housing Element.

Regional Housing Needs Assessment

The Southern California Association of Governments (SCAG) has conducted a Regional Housing Needs Assessment (RHNA) to determine the City's share of the affordable housing needs for the San Bernardino region. The RHNA quantifies Rialto's local share of housing needs for the region by income category. Income categories are based on the most current Median Family Income (MFI) for San Bernardino County. The City's 2021-2029 RHNA allocation is as follows:

- 2,218 units – Very Low-Income (0-50% of County MFI)
- 1,206 units – Low-Income (50-80% of County MFI)
- 1,371 units – Moderate-Income (81-120% of County MFI)
- 3,477 units – Above Moderate-Income (120% or more of County MFI)

8,272 units – Total

A. Housing Goals

The City of Rialto has identified the following housing goals as part of this Housing Element Update:

Housing Goal #1: Maintain and improve the quality of existing housing and neighborhoods in Rialto.

Housing Goal #2: Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.

Housing Goal #3: Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.

Housing Goal #4: Alleviate potential governmental constraints to housing production and affordability.

Housing Goal #5: Promote equal opportunity for all residents to reside in the housing of their choice.

The goals listed above are described throughout this Housing Plan with accompanying policies and programs to achieve them.

B. Housing Policies and Programs

Housing Conservation and Improvement

Housing and neighborhood conservation are important to maintaining and improving quality of life. Though a large portion of the City's housing stock is newer, some of the older neighborhoods show signs of inadequate maintenance and deterioration. Neighborhoods with large numbers of foreclosed and abandoned homes are a concern, especially with the recent collapse of the housing market. Efforts to improve and revitalize housing must not only address existing conditions, but also focus on preventative repairs to ensure the quality of the housing stock is maintained. The following policies address the continued need for housing and neighborhood conservation.

Housing Goal #1: Maintain and improve the quality of existing housing and neighborhoods in Rialto.

Policy 1.1: Promote the revitalization and rehabilitation of residential structures that are substandard or have fallen into disrepair.

Policy 1.2: Promote the maintenance of existing sound quality housing through preventative, rather than remedial, maintenance.

Policy 1.3: Encourage neighborhood and local involvement in addressing housing and neighborhood maintenance and improvement.

Policy 1.4: Undertake comprehensive neighborhood reinvestment strategies to stabilize and improve neighborhoods.

Policy 1.5: Preserve the existing character and quality of established single-family neighborhoods and communities.

Policy 1.6: Promote focused code enforcement and rehabilitation efforts to reverse the decline of transitioning neighborhoods.

Policy 1.7: Promote the conservation of physically sound buildings and neighborhoods that have historical or architectural significance.

Housing Program 1A: Acquisition, Rehabilitation, and Resale Program

Rialto will continue to acquire, maintain, and rehabilitate foreclosed homes in the community through the City's Acquisition, Rehabilitation, and Resale (ARR) Program. The ARR Program is designed to acquire, maintain, and rent foreclosed multi-family units to very low-income households. The units will be acquired by either the City or by for-profit or non-profit companies under the agreement of the City. Once complete, the units will be owned and managed by the company and must remain affordable for very low-income households for 55 years. The City anticipates assisting approximately 100 homes during the planning period.

Objectives:

- Continue to acquire, maintain, and rehabilitate foreclosed homes in the community through the City's ARR Program.
- Continue to implement the ARR program utilizing grant funds acquired through the Department of Housing and Urban Development's Neighborhood Stabilization Program.

- Maintain updated information on the ARR Program on the City's website, at City Hall, and in other public places to increase awareness and solicit applications for the program.

Timeframe: Review available funding annually, provide information on an annual basis, assist units on a project-by-project basis
Responsible Agency: Community Development Department
Funding Sources: County/State/Federal Funds

Housing Program 1B: Funding for Housing Rehabilitation Programs

Rehabilitation efforts are addressed through various programs. Several of the City's rehabilitation programs for both owner-occupied and rental housing relied on Redevelopment Agency Housing Set-Aside funds, including the following:

- Home Sweet Home Program
- Minor Rehabilitation Program
- Senior Minor Repair Program
- Rental Property Acquisition/Rehabilitation Program
- Rental Property Rehabilitation/Refinance Program
- Emergency Repair Mobile Home Program

Since the dissolution of Redevelopment, Rialto's housing rehabilitation programs are temporarily deferred pending the availability of other funding resources. During the 2021-2029 planning period, the City will investigate new funding opportunities offered by federal, state, local and private entities to support housing rehabilitation activities. The city is committed to investigate and/or apply to up to two additional funding sources that can contribute to housing rehabilitation.

Objectives:

- Annually investigate new funding opportunities, including CalHOME and CDBG funds.
- As funding becomes available, promote the housing rehabilitation programs on the City's website, at City Hall, and in other public places to increase awareness and solicit applications
- Investigate new funding opportunities offered by federal, state, local and private entities to support housing rehabilitation activities.

Timeframe: Review available funding annually, promote program on an annual basis.
Responsible Agency: Community Development Department
Funding Sources: General Fund; County/State/Federal Funds

Housing Program 1C: Code Enforcement

Rialto will continue to implement a proactive code enforcement program through the Code Enforcement Division. Code Enforcement will work closely with the Community Development Department to implement the City's housing programs to preserve and improve Rialto's neighborhoods. The Division will also continue to engage in emergency nuisance abatements actions against vacant and abandoned buildings. The City will continue to provide information on the City's zoning and building requirements and any available housing rehabilitation programs on the City's website and at City Hall.

Objectives:

- Implement a proactive code enforcement program through the Code Enforcement Division.
- Maintain updated information on the City's zoning and building requirements and any available housing rehabilitation programs on the City's website and at City Hall.

Timeframe: Annually review code enforcement cases and, if necessary, identify program changes based on community need.

Responsible Agency: Code Enforcement Division and Community Development Department

Funding Sources: General Fund

Housing Program 1D: Multi-Family Improvement Districts

Rialto will expand the Multi-Family Improvement District Program to other neighborhoods. This program is multi-action oriented and may include: implementing an acquisition, rehabilitation and affordable rental program and creation of an assessment district by the owners of at least two-thirds of the properties in a neighborhood. Since the dissolution of Redevelopment, expansion of this program has been temporarily deferred pending the availability of other funding sources. For the 2021-2029 planning period, the City will annually investigate new funding opportunities. When additional funding sources are identified, the City will evaluate the application of this program to other neighborhoods in Rialto.

The City will commit to apply to at least one applicable funding source, as funds are available, during the 2021-2029 planning period.

Objectives:

- Expand the Multi-Family Improvement District Program to other neighborhoods.
- Annually investigate new funding opportunities.

Timeframe: Annually investigate new funding opportunities, evaluation of neighborhoods within one-year of funding availability

Responsible Agency: Community Development Department

Funding Sources: General Fund

Housing Program 1E: Citywide Homeowner Association Survey

The strength of the homeowners' association is one of the critical factors contributing to the long-term success of a common-interest development. Factors common to effective HOAs are:

- An active Board of Directors, elected by the residents
- An approved set of CCRs and a willingness to enforce them
- Strong on-site property management
- Good potential tenant screening
- Adequate budgeting and reserves to address ongoing expenses and deferred maintenance

Larger multi-family properties which do not have these factors in place are likely to experience continuing problems, potentially leading to deteriorating appearance and diminishing property values. These troubled properties may eventually contribute to the decline of the surrounding neighborhood.

Objectives:

- Conduct a citywide survey of homeowner associations to identify and analyze their strength and health.
- Evaluate the options for enforcement legislation or incentive policies that would encourage strong homeowners' associations.

Timeframe: Conduct survey and evaluate regulatory and incentive-based options during 2021-2029 planning period

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 1F: Targeted Neighborhood Approach

The major source of housing problems and other societal neighborhood problems in the City of Rialto is distressed, poorly managed multi-family properties. In addition, the surrounding neighborhoods where these properties are located need attention as well. To systematically address these problem neighborhoods, the City will adopt a Targeted Neighborhood approach, focusing a variety of resources on specific neighborhoods in a concentrated and comprehensive fashion. Under the Targeted Neighborhood Approach, the City will first identify and prioritize its problem neighborhoods; determine which resources would be most appropriate for the targeted neighborhood; and apply resources to the targeted neighborhood until the desired measurements are achieved.

Objectives:

- Adopt a Targeted Neighborhood approach, focusing a variety of resources on specific neighborhoods in a concentrated and comprehensive fashion.

Timeframe: Initiate the Targeted Neighborhood Approach within one year of adoption of the Certified Housing Element.

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 1G: Receivership

To assist property owners with addressing problems with blighted properties, the City will continue to implement receivership. In cases where the owner cannot be contacted, or refuses to cooperate, however, the City has proactively sought the appointment of a receiver to oversee the repair and maintenance of the property, and to ensure that the property is occupied or purchased by an owner who will maintain the property.

Objectives:

- Continue to implement receivership.

Timeframe: Annually outreach to property owners with blighted properties. Promote informational materials within one year of adoption of the Certified Housing Element.

Responsible Agency: City of Rialto

Funding Sources: General Fund

Housing Availability and Production

Meeting the housing needs of all residents of the community requires the identification of adequate sites to accommodate a variety of housing types. By continuing to maintain an inventory of potential sites, the City will ensure that adequate residentially-zoned and mixed-use sites are available to accommodate the 2021-2029 RHNA.

Housing Goal #2: Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.

Policy 2.1: Utilize the Managing the Land Supply Element, Zoning Ordinance, and other land use controls to provide housing sites that can facilitate and encourage the development of a variety of housing consistent with the City's identified local needs and its regional housing responsibilities.

Policy 2.2: Establish incentives and regulatory concessions to promote the development of housing for very low-, low-, and moderate-income persons, and especially those with special needs.

Policy 2.3: Encourage the infilling of vacant residential land and the recycling of underutilized residential land, particularly in Downtown Rialto, along Foothill Boulevard, the Pepper Avenue Specific Plan area, the Renaissance Specific Plan area, and the Lytle Creek Ranch Specific Plan area.

Policy 2.4: Address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units.

Policy 2.5: Promote the phased and orderly development of new neighborhoods consistent with the provision of infrastructure improvements.

Policy 2.6: Promote infill development by pursing grants to investment in infrastructure.

Housing Program 2A: Provide Adequate Sites to Accommodate the RHNA

To facilitate development of housing to accommodate the 2021-2029 RHNA, as identified in **Appendix B** of this Housing Element, the City has identified a total of 315 parcels that are appropriate to accommodate up to 16,240 dwelling units. Adequate sites will be demonstrated during the 2021-2029 planning period through a combination of accessory dwelling units (ADUs), sites previously identified in the 5th Cycle Housing Element, current projects that are in the process of entitlement or construction (in-the-pipeline), and sites within existing adopted specific plans. The remaining sites will be accommodated through a variety of rezone programs as identified in Program 2B.

To ensure sufficient residential capacity to accommodate the identified regional need for lower income households is maintained; the City will develop and implement a formal monitoring program. The program will track development (residential, commercial, and mixed-use) approvals in the identified Housing Element land inventory sites. The City will report on the progress of development in its annual progress reports required pursuant to Government Code Section 65400 and due on April 1st of each year. The

inventory of available sites will also be made available to the development community through various outreach methods.

Objectives:

- Develop, implement, and promote a formal monitoring program to track development (residential, commercial, and mixed-use) approvals in the identified Housing Element land inventory sites.
- Report on the progress of development in the annual progress reports required pursuant to Government Code Section 65400 and due on April 1st of each year.

Timeframe: Immediately upon adoption of the Housing Element, complete rezones identified in Housing Program 2B, annual review and evaluation

Responsible Agency: Community Development Department

Funding: General Fund

Housing Program 2B: Rezone to Provide Adequate Sites to Accommodate RHNA

The City of Rialto has a total Regional Housing Needs Assessment (RHNA) allocation of 8,272 dwelling units. State law requires the City of Rialto to identify adequate sites to accommodate its fair share allocation for the 6th Cycle Housing Element. The City has identified existing residentially zoned sites to accommodate the RHNA allocation for above moderate-income units. To meet the remaining RHNA allocation for lower-income and moderate-income units, the City has identified seven (7) opportunity sites to be rezoned with potential to accommodate a total of 8,587 dwelling units, as listed below and detailed in **Appendix B**:

- **Opportunity Area 1: Foothill Boulevard**– The City has identified 110 parcels (identified in **Table B-20**) totaling 159 acres for rezone to a new zone which will accommodate an assumed density of 35 dwelling units/acre. The rezone can accommodate a total of 4,437 units.
- **Opportunity Area 2: North Riverside Avenue**– The City has identified 15 parcels (identified in **Table B-19**) totaling 17 acres for rezone to R-4 HDMF which will accommodate a maximum density of 48.4 dwelling units/acre. The rezone can accommodate a total of 673 units.
- **Opportunity Area 3: Gateway Specific Plan**– The City has identified 2 parcels (identified in **Table B-19**) totaling 20 acres for rezone to a new zone which will accommodate an assumed density of 35 dwelling units/acre. The rezone can accommodate a total of 558 units.
- **Opportunity Area 4: Central Area**– The City has identified 60 parcels (identified in **Table B-19**) totaling 14 acres for rezone to R-X which will accommodate a maximum density of 48 dwelling units/acre. The rezone can accommodate a total of 350 units.
- **Opportunity Area 5: Baseline Parcels**– The City has identified 10 parcels (identified in **Table B-19**) totaling 9 acres for rezone to a new zone which will accommodate an assumed density of 35 dwelling units/acre. The rezone can accommodate a total of 163 units.
- **Opportunity Area 6: Baseline Shopping Center**– The City has identified 35 parcels (identified in **Table B-19**) totaling 57 acres for rezone to a new zone which will accommodate an assumed density of 30 dwelling units/acre. The rezone can accommodate a total of 1,353 units.

- **Opportunity Area 7**: Housing Opportunity Sites – The City has identified 26 parcels (identified in Table B-19) totaling 46.7 acres for rezone to a new zone which will accommodate an assumed density of 30 dwelling units/acre. The rezone can accommodate a total realistic capacity of 1,053 units.

In 2023, a Zoning Amendment, consistent with Government Code Section 65583, subdivision (c)(1) and 65583.2 subdivisions (h) and (i), was adopted to specifically require that sites rezoned to accommodate a portion of the City's RHNA:

1. Permit owner-occupied and rental multifamily uses by right and not require a conditional use permit or other discretionary review or approval for developments in which 20 percent or more of the units are affordable to lower income households.
2. Permit the development of at least 16 units per site and a minimum of 20 dwelling units per acre;
3. At least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or
4. For sites designated for mixed-use, allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project;
    - The City implements all of the requirements of Government Code Section 65583, subdivision (c)(1) and 65583.2 subdivisions (h) and (i) for sites rezoned to accommodate a portion of the City's RHNA and the City shall allow projects according to the proposed zoning identified in the sites inventory and not require applicants of projects at these sites to complete zoning or other amendments in order to implement the provisions of Government Code Section 65583, subdivision (c)(1) and 65583.2 subdivisions (h) and (i).

The City has identified additional sites (**Opportunity Area 7**: Housing Opportunity Sites) that can be included in the Overlay to increase housing choice and capacity. The City will complete amendments to the Overlay by August 2025. The rezones will comply with *Martinez v. City of Clovis (2023) 90 Cal.App.5th 193* by requiring that residential development projects must comply with the Overlay.

There is a significant buffer of sites (96% beyond RHNA) which allows the rezones to accommodate a surplus of units. The City will continue to monitor development throughout the 6th Cycle planning period and if sites become unavailable and the buffer is depleted, the City will identify additional sites within 6 months.

Timeframe: The sites identified in Appendix B were rezoned in 2023 consistent with the requirements of Government Code section 65583.2, subdivisions (h) and (i) and, fully adhere to the requirements of Government Code section 65583.2, subdivisions (h) and (i); annual monitoring and reporting throughout the planning period. The City has identified additional sites (**Opportunity Area 7**: Housing Opportunity Sites) that can be rezoned to increase housing choice and capacity. The City will complete the rezones by October 2025. The City will continue to monitor development throughout the 6th Cycle planning period and if sites become unavailable and the buffer is depleted, the City will identify additional sites within 6 months.

Responsible Agency: Community Development Department
Funding: General Fund

Housing Program 2C: Replacement Housing

The City may have existing non-vacant sites included within the inventory of sites that may contain vacant or demolished residential units that were occupied by lower income households or households subject to affordability requirements within the last five years. The City will adopt a formal replacement housing program to ensure the replacement of any units lost for housing units shall comply with the same requirements pursuant to Government Code section 65915.

Objectives:

- Adopt a formal replacement housing program to ensure the replacement of any units lost for housing units shall comply with the same requirements pursuant to Government Code section 65915.

Timeframe: Formalize program requirements within one year of adopting the Certified 2021-2029 Housing Element
Responsible Agency: Community Development Department
Funding: General Fund

Housing Program 2D: Accessory Dwelling Unit Construction

The City adopted an Accessory Dwelling Unit Ordinance in 2020, in compliance with statutory requirements. Accessory Dwelling Units (ADUs) are an accepted method of providing affordable housing in the City. Due to recent legislation, the ability to entitle and construct ADUs has increased significantly. The City recognizes the significance of this legislation as evidenced by a marked increase in ADU permit applications. Due to this legislation, the City believes aggressive support for ADU construction will result in increased opportunities for housing including affordable units.

The City will support and accommodate the construction of at least 128 ADUs by a variety of methods, including but not limited to:

- Developing and implementing a public awareness campaign for construction of ADUs with a systematic approach utilizing all forms of media and outreach distribution
- Preparing and maintaining a user-friendly website committed to information related to codes, processes, and incentives pertaining to the development of ADUs and JADUs in the City.
- Approving permit-ready standard plans to permit new ADU construction to minimize design costs, expedite permit processing, and provide development certainty for property owners.

Timeframe: ADU public awareness campaign began in 2023 and is ongoing; The City updated and maintains a user-friendly website which consolidates all ADU-related information in an easy to understand format; The City has established the "Pre-Selected ADU Plans Program," which allows residents to select from 11 pre-approved ADU plans, streamlining the review process and reducing costs for the applicant.
Responsible Agency: Planning Division and Building Division
Funding Sources: General Fund

Housing Program 2E: Accessory Dwelling Unit Monitoring Program

The City will establish an ADU Monitoring Program during the 2021-2029 Housing Element Planning Period to formally track ADU development. The analysis will track applications for ADUs, location, and other important features. The intent of the Monitoring Program is to track progress in meeting 2021-2029 ADU construction goals and to evaluate the need to adjust programs and policies if the pace of construction is less than anticipated. Should changes need to be made due to a gap in the number of ADUs projected and the number permitted, the City will make changes proportional to the gap identified within 6 months of the annual review. This may include, but is not limited to, rezoning or similar actions.

Objectives:

- Establish an ADU Monitoring Program.

Timeframe: Ongoing, reviewed annually, any changes deemed necessary will be made within 6 months of the annual review

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 2F: Non-Vacant Adequate Sites to Satisfy By-Right Requirements of AB 1397

State law requires that any non-vacant sites identified in a prior housing element must be zoned at 30 units per acre and allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households, if they are to be considered adequate for lower income housing.

Nineteen (19) non-vacant sites shown to be suitable for lower income housing in the Housing Element Sites Inventory provided in Appendix B were also identified in the 5th Cycle Housing Element.

Objectives:

- Permit at least 30 units per acre on sites identified in a prior housing element and allow residential use by-right for housing developments when at least 20 percent of the proposed units are affordable to lower income households.

Timeframe: Complete required rezones within one year of the adoption of the Certified Housing Element

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 2G: Objective Design Standards

State Housing law includes various exemptions for projects with an affordable housing component, which limits the City's ability to apply discretionary design review requirements to certain residential projects. State Housing law specifies having objective design standards available to apply to housing projects where the City's discretion over design review is otherwise preempted per State law. The City of Rialto will review existing entitlement processes for housing development and will eliminate discretionary review for all housing development proposals that include a minimum affordable housing component. The City will also review the appropriateness of its current development standards to ensure that it reasonably accommodates the type and density of housing it is intended to support. The City will also amend existing development standards to replace or remove all subjective standards for projects with a minimum

affordable housing component with objective standards that do not impede the type and density of housing it is intended to allow.

Objectives:

- Review existing entitlement processes for housing development and eliminate discretionary review for all housing development proposals that include a minimum affordable housing component.
- Review the appropriateness of current development standards to ensure that they reasonably accommodate the type and density of housing they are intended to support.
- Amend existing development standards to replace or remove all subjective standards for projects with a minimum affordable housing component with objective standards that do not impede the type and density of housing they are intended to allow.

Timeframe: Adopt within 2 years of Certified Housing Element Adoption
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2H: SB 35 Streamlining

The City will establish written procedures to comply with California Government Code Section 65913.4 and publish those procedures for the public, as appropriate, to comply with the requirements of SB 35, Chapter 366 Statues 2017. These requirements apply at any point in time when the City does not meet the State mandated requirements, based upon the SB 35 Statewide Determination Summary Report for Housing Element progress and reporting on Regional Housing Needs Assessment (RHNA). The City will process development projects with at least 50 percent affordable units through a streamlined permit process (i.e., 90 days for projects with up to 150 units). All projects covered by SB 35 are still subject to the objective development standards of the Rialto Municipal Code that includes the Building and Fire Codes. However, qualifying projects cannot be subject to discretionary review or public hearings; and in many cases the City cannot require parking. Reduced parking requirements would be established consistent with the requirements of SB 35 for qualified streamlining projects.

Objectives:

- Establish written procedures to comply with California Government Code Section 65913.4 and publish those procedures to comply with the requirements of SB 35, Chapter 366 Statutes 2017.

Timeframe: Establish procedures within one year of Certified Housing Element Adoption
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2I: Emergency Shelters

The City adopted an Ordinance in 2020 in compliance with Senate Bill 2, the City of Rialto has amended the Zoning Code to allow emergency shelters by-right within the Industrial Park (I-P) zoning district. This area was selected due to the availability of multiple vacant parcels and the conversion of existing commercial and industrial development for the development of new emergency shelters.

The Emergency and Transitional Act of 2019 (AB 139) sets limits to parking requirements established by jurisdictions so as to avoid creating constraints to the development of emergency shelters. AB 139 specifically states that emergency shelters must provide 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 City will amend the Zoning Code to ensure compliance with all provisions of AB 139, including parking requirements.

Chapter 654, Statues of 2022 (AB 2339), now includes new requirements on how cities must plan for emergency shelters and ensure sufficient capacity for low-income housing. AB 2339 requires that zoning designations identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit must allow other residential uses. This could include zones that allow mixed uses that permit residential. The City will amend the Zoning Code to allow emergency shelters by-right (non-discretionary) in at least one zone that allows other residential uses. The specific zone has not been identified but the City will identify a zone that can accommodate unmet need, consistent with the San Bernardino County's Homeless Strategic Action Plan. The designated zone will include adequate sites that meet at least one of the following:

- Vacant sites with mixed-use zoning;
- Vacant sites zoned for residential use;
- Nonvacant sites that are suitable for use as a shelter or that can be redeveloped for a shelter in the current Housing Element period; or
- Sites owned by the local government

Section 65583 (B)(v) of the Government Code allows jurisdictions to adopt proximity standards, provided that emergency shelters are not required to be more than 300 feet apart. The City's current Zoning Code prohibits emergency shelters on parcels within 300 feet from any other emergency shelters. The City will amend the Zoning Code to ensure compliance with all provisions of AB 2339, including definitions, zoning, and all development standards, including spacing requirements.

The City will continue to monitor the inventory of sites appropriate to accommodate emergency shelters and will work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. The City is committed to prioritizing funding and other available incentives for projects that provide housing for homeless and extremely low-income residents whenever possible.

Objectives:

- Continue to monitor the inventory of sites appropriate to accommodate emergency shelters and work with the appropriate organizations to meet the needs of homeless and extremely low-income residents.
- Comply with State law.

Timeframe: Review annually 2021-2029, provide an annual update on the inventory of available sites for emergency shelters as part of the City's Annual Report review and documentation; Amend the Zoning Code to comply with AB 139 and 2339 by June 2025.

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 2J: Transitional and Supportive Housing

In compliance with Senate Bill 2, the City of Rialto has amended the Zoning Code to allow transitional and supportive housing by-right in all zones allowing residential uses, subject only to those regulations that apply to other residential uses of the same type in the same zone. The City will continue to monitor the inventory of sites appropriate to accommodate transitional and supportive housing and will work with the appropriate organizations to meet the needs of homeless and extremely low-income residents. The City is committed to prioritizing funding and other available incentives for projects that provide housing for homeless and extremely low-income residents whenever possible.

Objectives:

- Continue to monitor the inventory of sites appropriate to accommodate transitional and supportive housing and work with the appropriate organizations to meet the needs of homeless and extremely low-income residents.

Timeframe: Review annually 2021-2029, provide an annual update on the inventory of available sites for transitional and supportive housing as part of the City's Annual Report review and documentation
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2K: Manufactured Housing

The City adopted an Ordinance in 2020 in compliance with Government Code Section 65823.3 which specifies that local governments cannot exclude permanently sited manufactured homes from lots zoned for single-family dwellings (unless manufactured housing is more than 10 years old) but may require certain design/architectural requirements. The amendments define manufactured housing and mobile homes consistent with State law and identify the zone(s) where such housing is permitted. Additionally, the Ordinance requires standards for manufactured homes are the same as a conventional single-family dwelling unit in the same zone.

Objectives:

- Ensure all development standards, procedures and design criteria meet the objectives of Government Code Section 65823.3.

Timeframe: Ongoing, 2021-2029, review annually
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2L: Condominium Conversion

Rialto recognizes the importance of preserving the City's affordable rental housing stock and discouraging conversions that could decrease the number of existing affordable units. The City will research and consider the applicability of a citywide Condominium Conversion Ordinance. The research will review the following topics: how to minimize the potential displacement of current tenants, replacement requirements for affordable rental units, and ways to alleviate the potential negative effects of condominium conversion on the rental housing stock.

Objectives:

- Research and consider the applicability of a citywide Condominium Conversion Ordinance.

Timeframe: Research and consider a citywide Condominium Conversion Ordinance within one-year of Housing Element adoption

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 2M: Single-Room Occupancy (SRO)

Rialto recognizes that single-room occupancy units may provide a valuable source of affordable housing for individuals and can serve as an entry point into the housing market for people who previously experienced homelessness. The City will adopt provisions in its Zoning Code to identify zone(s) to permit single-room occupancy units and consider additional requirements for this type of housing, including parking, on-site amenities, and management and safety plans. The City will consider more streamlined permitting procedures, technical assistance for potential SRO developers, and outreach to property owners of existing SRO developments.

Objectives:

- Adopt provisions in the Zoning Code to identify zone(s) to permit SRO units and consider additional requirements for this type of housing, including parking, on-site amenities, and management and safety plans.
- Consider more streamlined permitting procedures, technical assistance for potential SRO developers, and outreach to property owners of existing SRO developments.

Timeframe: Revise Zoning Code to permit SROs and additional development regulations and requirements within one-year of Housing Element adoption

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 2N: Alternative Housing Concepts

To provide more potential housing opportunities in Rialto, the City will review and research alternative housing concepts such as live-work developments, small lot developments, two master-bedroom housing units, and co-op housing. The City will review the applicability of these housing types in Rialto and review and revise the Zoning Code, as appropriate, to encourage development.

Objectives:

- Review and research alternative housing concepts.

Timeframe: Research alternative housing concepts by December 2025, review and revise Zoning Code, as appropriate by June 2026

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 2O: Lot Consolidation

The City will encourage and facilitate the consolidation of vacant and underutilized lots for residential development through a variety of incentives, including, but not limited to: technical assistance to property owners and developers in support of lot consolidation, identifying opportunities for potential consolidation and offering development incentives such as reduction in setbacks, parking requirements, and other standards. Consolidation will provide the opportunity to develop vacant and underutilized lots to their fullest potential. The City will evaluate the appropriateness of a variety of incentives and provide this information to the developers and other interested parties through the City's website and print material at City Hall.

Objectives:

- Encourage and facilitate the consolidation of vacant and underutilized lots for residential development, with an emphasis on affordable housing.
- Maintain updated information on incentives online and at City Hall.

Timeframe: Identify lot consolidation standards, incentives and encouragement tools in FY 2025
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2P: Small Lot Consolidation

The City has identified a number of smaller-sized parcels, each under half an acre, to accommodate a portion of the RHNA allocation for lower income units. The location of these parcels in the downtown area, with many of those parcels under City ownership, and their proximity to transit and support services makes them ideal candidates for housing. To facilitate the development of larger multiple family projects in these areas, the City will adopt provisions in its Zoning Code to encourage and incentivize developers to consolidate these parcels. To promote small lot consolidation, the City will promote the program at City Hall and on its website. The City will evaluate requests on a case-by-case basis in the housing cycle.

Objectives:

- Adopt provisions in the Zoning Code to encourage and incentivize developers to consolidate smaller parcels.
- Promote the program at City Hall and online and evaluate requests on a case-by-case basis.
- Housing Program 2O and 2U objectives.

Timeframe: Initiate program upon adoption of 6th Cycle Housing Element, review and update annually, as deemed appropriate.
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2Q: Subdivision of Specific Plan Areas

The City will work with Specific Plan proponents/applicants to facilitate the efficient subdivision of parcels greater than 10 acres within the private Specific Plan Areas identified in the Housing Element. This program assists in creating developable parcels to accommodate the lower income RHNA need pursuant to the City's RHNA obligation.

Objectives:

- Work with Specific Plan proponents/applicants to facilitate efficient subdivision of parcels greater than 10 acres within the private Specific Plan Areas.

Timeframe: Continue facilitation through the development phases in each adopted Specific Plan
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2R: Residential Incentives

The City will assess and provide adequate incentives for the development of residential uses on identified candidate housing sites which may also permit nonresidential uses. While projections provided in the candidate sites analysis are derived from conservative calculations, incentives will be implemented to further contribute to sites being developed with residential units to accommodate a portion of the City's 2021-2029 RHNA allocation, especially lower income households. As part of the City's Annual Progress Report, the City will review its available sites inventory and, if deemed necessary, identify new sites.

Objectives:

- Assess and provide adequate incentives for the development of residential uses on identified candidate housing sites which may also permit nonresidential uses.
- Review the available sites inventory as part of the Annual Progress Report, and if necessary, identify new sites.

Timeframe: Review annually, incentives to be identified within 24 months of adoption of the Housing Element and in conjunction with rezones, overlays or other appropriate regulatory amendments, implementation of the incentives to be completed within 36 months of adoption of the Housing Element
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2S: Surplus Land Act

The City will maintain compliance with the Surplus Land Act throughout the 2021-2029 Housing Element period. The City will assess the appropriateness of and consider implementing the following: outreach opportunities with housing developers, requests for proposals, development incentives, fee waivers, priority processing, and financial assistance (when available) to facilitate and incentivize developers to develop housing units on City-owned sites.

The City plans to make 24 properties available through the Surplus Land Act process over the next two years for a potential development of 1,464 units (92 affordable to lower income households, 408 for moderate income households, and 951 for above moderate income households). In the past, the City has had limited developers respond. If one developer responds, the City anticipates approvals (entitlements and development agreements) within a year to a year-and-a-half. If multiple developers respond, the City anticipates releasing an RFP, which may take six months, two years to enter into an Exclusive Negotiation Agreement, and two additional years for land use entitlements and development agreements.

Objectives:

- Maintain compliance with the Surplus Land Act throughout the 2021-2029 Housing Element period.
- Release available sites and requests for proposals to develop on publicly owned sites and establish a schedule of actions to facilitate development within two years of adoption of the Housing Element.
- Establish and implement a variety of incentives to facilitate housing development.
- Make properties available through the Surplus Land Act process.
- Establish an RFP process and solicit developers by Spring 2024
- Target Exclusive Negotiating Agreement by Spring 2025
- Target land use entitlements issuance by Winter 2025

Timeframe: Assess potential incentive actions within 12 months of adoption of the Housing Element, implement incentive actions within 24 months of adoption of the Housing Element
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2T: Inclusionary Housing Ordinance

The City will investigate the feasibility of adopting an Inclusionary Housing Ordinance, which ensures the production of affordable units in new market-rate development by establishing affordable housing set-aside requirements on residential projects that meet certain criteria. The City's goal is to incorporate the following features:

- Require that in all new residential developments in the City with more than 10 units provide a "set aside percentage" of affordable housing units, with fractional housing units rounded to the nearest whole number.
- The "set aside percentage" shall be at least 10 percent of the units proposed by the applicant affordable to very low- and low-income households. The "set aside percentage" may include moderate-income units, as defined in Health and Safety Code section 50093, in addition to the 10 percent very low- and low-income households.
- For affordable housing rental units, the Ordinance shall require that at least 5 percent of the total number of units in the development project shall be affordable to very low-income households, and at least 5 percent of the total number of units in the development project will be affordable to low-income households. The City may include housing affordable to moderate-income households in addition to the units affordable to very low- and low-income households. In the case of for-sale affordable housing, 100 percent of the "set aside" units shall be affordable to at least low-income households.
- Affordable housing units within a rental housing project shall be required to remain affordable through recorded covenants for not less than 55 years, and in the case of for sale housing project shall be required to remain affordable through recorded covenants for not less than 45 years.
- Affordable housing units shall be developed concurrently with market rate units, and shall have the following qualities: be reasonable dispersed throughout the residential development, have

comparable exterior design as market rate units, have a proportional bedroom mix, and comparable interior features as market rate units.

- The City shall monitor compliance with the affordability covenants in the same manner and with the same frequency as the City monitors other housing programs utilizing City funds or containing occupancy income restrictions.
- The City will prepare and present at a City Council hearing an annual report on the status of the Ordinance.
- The Ordinance shall encourage applicants to construct affordable dwelling units, rather than select any alternative methods to satisfy its terms. In the event the City allows an in-lieu fee as an alternative to constructing units, the fee shall be set at no less than $3 per square foot, provided there is no legal requirement to the contrary. An applicant may pay an in-lieu fee, subject to approval by the City Council, upon a demonstration that providing the affordable units in the residential development would create an unreasonable economic hardship due to such factors as project size, site constraints, and/or excessively large affordability gaps.

Objectives:

- Evaluate and consider adopting an inclusionary housing ordinance requiring new residential developments to include a specified percentage of affordable units as a condition of development.
- Goal of facilitating the development of at least 415 very low-income and 415 low-income units during the 6th Cycle planning period.

Timeframe: Adopt an Inclusionary Housing Ordinance by March 2027.
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 2U: Site Assembly

The City will enable parcel assembly to create additional opportunities for affordable housing. The City will help facilitate lot consolidations to combine small lots into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives requested by developers.

The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2026 the City will review the effectiveness of this Program and revise as appropriate. The City will also pursue grant funding for parcel assembly land banking when it is available.

Objectives:

- Goal of facilitating the approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.
- Goal of facilitating the development of at least 415 very low-income and 415 low-income units during the 6th Cycle planning period.

Timeframe: Meet with developers and property owners starting in 2025 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months and annually thereafter. Support consolidation as applicable housing applications are received on an ongoing basis; pursue grant funding as feasible during planning period. By December 2026, the City will review the effectiveness of this Program and revise as appropriate.

Responsible Agency: City Manager's Office; Community Development Department; Planning Division

Funding Sources: General Fund; Grant Funding

Housing Affordability

Rialto is committed to furthering statewide goals for the provision of decent, adequate, and affordable housing to accommodate existing housing needs, as well as those that will come with regional growth. The City will assist in the development of adequate housing that is affordable to all economic segments of the population.

Housing Goal #3: Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.

Policy 3.1: Facilitate the development and preservation of affordable housing by offering financial and/or regulatory incentives.

Policy 3.2: Provide homeownership assistance for lower- and moderate-income households; support rental assistance for lower-income households.

Policy 3.3: Encourage the development of housing for special need households by offering density bonus and other zoning incentives.

Policy 3.4: Support the development of rental units with three or more bedrooms to provide affordable housing that adequately accommodates larger families, thereby reducing overcrowding and overpayment.

Policy 3.5: Encourage the construction of apartment complexes with strong on-site management to ensure that housing is well maintained.

Housing Program 3A: Down Payment Assistance Program

The City will continue to assist homebuyers through the Down Payment Assistance Program (DPA), a deferred loan program provided as down payment assistance. Applicants are required to be low- or moderate-income and may qualify for loan forgiveness if they reside in the home for at least 15 years. The City will continue to provide information on the Down Payment Assistance Program on the City's website and at City Hall. The City anticipates assisting 100 homeowners during the 2021-2029 planning period, depending on grant funding availability.

Objectives:

- Continue to assist homebuyers through the Down Payment Assistance Program (DPA) and maintain updated information on the DPA online and at City Hall.

Timeframe: Review annually, 2021-2029
Responsible Agency: Community Development Department
Funding Sources: County/State/Federal Funds

Housing Program 3B: Preserve and Monitor At-Risk Units

The City works with individual property owners to encourage the maintenance of affordability of assisted units. There are 257 assisted multi-family units at-risk of converting to market rate during the ten years following the beginning of the planning period (2021-2029). The City is committed to preserving its stock of affordable housing and will provide technical assistance, seek additional nonprofit and for-profit partners, and facilitate financial assistance for affordable housing units at-risk of conversion. The City will continue to work with property owners to develop a strategy to maintain affordability controls on assisted units.

The City will also inventory and gather information to establish an early warning system for publicly assisted housing units that have the potential to convert to market rate. This will include an annual review of the conversion status of all subsidized housing in the City. The City will develop and maintain an AB 987 database to include detailed information on all subsidized units, including those that have affordability covenants. The database will indicate the expiration date of any covenant and any requirements governing reimbursement.

When available, the City will utilize resources such as HUD Section 208/811 loans, HOPE II and III Homeownership program funds, HOME funds, CDBG funds, Low-Income Housing Tax Credit Programs, California Housing Finance Agency single-family and multi-family programs, programs to stimulate private developer and nonprofit entity efforts in the development and financing of housing for lower and moderate-income households. The City will continue to monitor at-risk developments throughout the planning period and pursue partnership opportunities with non-profits to preserve and expand affordable housing in the City.

Objectives:

- Work with property owners to develop a strategy to maintain affordability controls on assisted units.
- Establish an early warning system for publicly assisted housing units that have the potential to convert to market rate.
- Develop and maintain an AB 987 database.
- As available, utilize resources to stimulate private developer and nonprofit entity efforts.

Timeframe: Ongoing, 2021-2029, review and provide an annual update on the at-risk status of affordable units in Rialto as part of the City's Annual Report review and documentation. Establish procedures for early warning system with 12 months of housing element adoption.
Responsible Agency: Community Development Department
Funding Sources: General Fund/Qualified Entity Funds

Housing Program 3C: Mobile Home Park Preservation

Mobile home parks provide a valuable source of affordable ownership housing in Rialto. To encourage the preservation of mobile home parks, the City will continue to implement the mobile home rent control ordinance and convene the Mobile Home Rent Review Commission. The City will continue to provide information on the mobile home rent control ordinance at City Hall and work with mobile home park owners and tenants to resolve any issues.

Objectives:

- Continue to implement the mobile home rent control ordinance, convene the Mobile Home Rent Review Commission, and maintain updated information online and at City Hall.

Timeframe: Review annually. Provide amendments to Ordinance, as necessary.
Responsible Agency: Community Development Department
Funding Sources: General Fund

Housing Program 3D: County Homeownership Program

To encourage low- and moderate-income homeownership, Rialto will continue to provide information on the City's website and at City Hall on the County of San Bernardino's Homeownership Assistance Program (HAP). The program assists low- and moderate-income homebuyers meet the cash requirements of a home purchase. The HAP funds may be used for gap financing, down payment, or closing cost assistance. The assistance is in the form of a deferred loan and is secured by a second trust deed.

Objectives:

- Maintain updated information on the County's Homeownership Assistance Program (HAP) online and at City Hall

Timeframe: Continue annual dissemination of information. Modify dissemination as necessary based on annual review.
Responsible Agency: County of San Bernardino Economic and Community Development Department; Rialto Community Development Department
Funding Source: County of San Bernardino; General Fund

Housing Program 3E: Good Neighbor Next Door Program

To support homeownership among local police officers, fire personal, and teaches, Rialto will continue to participate in and provide information on the Department of Housing and Urban Development's (HUD) Good Neighbor Next Door Program at City Hall. Through the federal program, applicants can purchase homes from a selected list of HUD homes, which are available at a 50 percent discount off the listed price. The City will continue to provide information on the Good Neighbor Next Door Program at City Hall.

Objectives:

- Participate in and provide information on the Department of Housing and Urban Development's (HUD) Good Neighbor Next Door Program at City Hall.

Timeframe: Continue annual dissemination of information. Modify dissemination as necessary based on annual review.

Responsible Agency: Department of Housing and Urban Development; Rialto Community Development Department

Funding Sources: Department of Housing and Urban Development Good Neighbor Next Door Program; General Fund

Housing Program 3F: County Housing Voucher Program

The City will continue to cooperate with the San Bernardino County Housing Authority to administer the Housing Voucher Program (Section 8). The program provides rent subsidies to very low-income households that spend more than 50 percent of their income on rent. The City will continue to refer residents to the County program and provide information at City Hall, the City's website, and other public places to increase awareness and solicit applications.

Objectives:

- Continue to cooperate with the San Bernardino County Housing Authority to administer the Housing Voucher Program (Section 8).
- Maintain updated information online, at City Hall, and other public places, and refer residents to the County program.

Timeframe: Continue annual dissemination of information. Modify dissemination as necessary based on annual review.

Responsible Agency: County of San Bernardino Housing Authority; Rialto Community Development Department

Funding Sources: County of San Bernardino; General Fund

Housing Program 3G: Tenant-Based Rental Assistance

The County of San Bernardino uses HOME funds to provide financial assistance with required security deposits on rental housing units and tenant-paid utilities to persons who can afford monthly rent payments but lack necessary funds to get into and/or, to avoid being displaced from, decent housing. In addition, the County provides funds to low- and moderate-income renter households through the Monthly Rent Subsidies Program, also funded by the County HOME Program. Rialto will continue to participate in this County program and provide information about the program at City Hall and the City's website.

Objectives:

- Participate in the County's Tenant-Based Assistance program and maintain updated information at City Hall and online.

Timeframe: Continue annual dissemination of information. Modify dissemination as necessary based on annual review.

Responsible Agency: County of San Bernardino Economic and Community Development Department; Rialto Community Development Department

Funding Sources: County of San Bernardino HOME Funds; General Fund

Housing Program 3H: Parking Near Public Transit

AB 2097 prohibits public agencies from imposing minimum vehicle parking requirements for developments located within half-a-mile of a major transit stop, as defined by Section 21155 of the Public Resources Code.

Jurisdictions may impose or enforce minimum parking requirements on housing developments if findings are made (within 30 days of a completed application) that not imposing minimum parking requirements on the development would have substantially negative impacts on the jurisdiction's ability to meet its RHNA or existing residential or commercial parking within half-a-mile of the housing development. These findings must be supported by a preponderance of the evidence in the record. Pursuant to AB 2097, the projects listed below are exempt from imposed or enforced minimum parking requirements:

- Housing development projects that dedicate a minimum of 20 percent of the total number of housing units to very low-, low-, or moderate-income households; students; the elderly; or persons with disabilities.
- Housing developments with fewer than 20 housing units.
- Housing developments subject to parking reductions based on any other applicable law.

AB 2097 prohibits these provisions from reducing, eliminating, or precluding the enforcement of any requirement imposed on a housing development project that is located within half-a-mile of public transit to provide electric vehicle supply equipment installed parking spaces or parking spaces that are accessible to persons with disabilities.

Objectives:

- Amend the Zoning Code to comply with the requirements established by AB 2097.

Timeframe: Adopt the amendment within 24 months of adoption of the Housing Element.
Responsible Agency: Planning Division
Funding Sources: General Fund

Removing Governmental Constraints

Factors that pose constraints to the provision of housing include the costs of developing both ownership and rental housing, which are ultimately passed to the consumers; the availability and cost of mortgage and rehabilitation financing; and restrictive zoning or other development regulations. These factors tend to disproportionately impact lower- and moderate-income households due to their limited resources for absorbing the costs. The City of Rialto will, where legally possible, will remove governmental constraints affecting the maintenance, improvement, and development of housing.

Housing Goal #4: Alleviate potential governmental constraints to housing production and affordability.

Policy 4.1: Periodically review City regulations and ordinances to avoid unduly constraining housing development.

Policy 4.2: Offer financial and/or regulatory incentives where feasible to offset or reduce the costs of developing affordable housing.

Policy 4.3: Provide for timely processing of development projects to minimize project holding costs.

Policy 4.4: Periodically review residential development fees and service fees to ensure that they are appropriately related to and do not constrain the development.

Housing Program 4A: Density Bonus

To facilitate development, the City offers developers the opportunity to take advantage of the Density Bonus Program which is a density increase of 35 percent plus development incentives for qualified affordable projects. The City will provide information on the Density Program at City Hall and the City's website.

The City adopted a Density Bonus Ordinance in 2020 in compliance with Government Code Section 65915, inclusive of AB 1763.

Objectives:

- Maintain updated information on the Density Bonus Program at City Hall and online.

Timeframe: Ongoing, 2021-2029, provide an annual update on the progress of the Density Bonus Ordinance as part of the City's Annual Report review and documentation
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 4B: Remove Development Constraints

On a regular basis, City staff will review the development standards and design review findings in the Zoning Code to identify standards and requirements that may constrain the development of affordable housing in Rialto. Specifically, staff will review requirements such as the minimum unit size, including minimum unit size requirements for Accessory Dwelling Units (ADUs) and Single-Room Occupancy units (SROs); setbacks; parking requirements, including parking requirements for studio apartments/units; height restrictions; etc. to ensure that they are necessary and pertinent.

The City will also review the existing Precise Plan of Design requirements and process to identify any constraints on the development of affordable housing in the City. Staff will also on a case-by-case basis identify ways that standards can be relaxed if it is determined that such requirements are impeding the development of affordable housing in the City. The City will continue to provide development standard modifications, streamlined processing for applications related to the creation of affordable housing, and will offer fee modifications for projects proposing affordable units that are required to apply for variations to the existing development standards.

The City currently requires multi-family housing developments of five or more units in the R-3 zone to receive approval of a Conditional Use Permit. The City will review its permit requirements for multi-family housing, specifically in the R-3 zone, to identify if the permit requirement creates a constraint to the development of housing and affordable housing. This will include meeting with the developer community annually to receive feedback on the permitting and development review process. In addition, the minimum lot size and lot coverage requirements for the R-3 zone will be reviewed and amended to remove constraints to development.

Objectives:

- Review the development standards and design review findings in the Zoning Code to identify standards and requirements that may constrain the development of affordable housing. Commit to revising or modify development standards that may constrain development.
- Review the existing Precise Plan of Design requirements and process to identify any constraints on the development of affordable housing. Commit to revising or modify Precise Plan development standards that may constrain development.
- Conduct a study of parking requirements and identify needed revisions to ensure parking requirements do not constrain development, particularly for studio and one-bedroom units. Commit to revising or modify development standards that may constrain development. Commit to reduce or revise parking requirements, particularly for studio and one-bedroom units.
- Continue to provide development standard modifications, streamlined processing for applications related to the creation of affordable housing, and offer fee modifications for projects proposing affordable units that are required to apply for variations to the existing development standards.
- In the R-3 zone, the City will review permit requirements for multi-family housing, as well as lot size and coverage requirements, to remove constraints to development. Commit to revising or modify permit requirements that may constrain development.

Timeframe: Ongoing, 2021-2029, provide an annual update on the review of the City's development standards and requirements in the Zoning Code as part of the City's Annual Report review and documentation

Responsible Agency: Planning Division

Funding Source: General Fund

Housing Program 4C: Water and Sewer Service Providers

Pursuant to Chapter 727, Statues of 2005 (SB 1087), the City of Rialto is required to deliver its adopted housing element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects, to ensure that the providers have an opportunity to provide input on the Element. Additionally, review of the Housing Element ensures that priority for water and sewer services is granted to projects that include units affordable to lower-income households.

Objectives:

- Deliver the adopted Housing Element, and any amendments, to local water and sewer service providers.

Timeframe: Forward to providers immediately upon adoption of the 2021-2029 Housing Element

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 4D: Availability of Zoning, Development Standards, and Fees Online

The City of Rialto shall provide all zoning and development standards, and fees for each parcel with its jurisdictional boundaries on the City's website pursuant to government transparency laws contained in Government Code GC 65940.19(a)(1)(B).

Objectives:

- Provide all zoning and development standards, and fees for each parcel with its jurisdictional boundaries on the City's website.

Timeframe: Continue annual dissemination of information. Modify dissemination as necessary based on annual review.

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 4E: Annual Review of Site Requirements

The City has identified that it is common for projects to not develop at their maximum density permitted. Development standards (yard requirements, lot coverage and size, building height limits, and parking standards) have been reviewed and found not to constrain developments from meeting their maximum density permitted. In order to identify potential constraints to development, the City will review its Building and Planning site requirements annually to identify potential constraints to development and make necessary changes that preclude property owners from developing at the maximum density permitted by their property's zoning.

Objectives:

- Review its Building and Planning site requirements annually to identify potential constraints to development and make necessary changes.

Timeframe: Review annually following adoption of the 2021-2029 Housing Element, necessary amendments identified during review will occur within 6 months

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 4F: Residential Incentives

To ensure sites identified in the Housing Element that allow for both residential and nonresidential use are maximized to the total residential potential assumed to demonstrate adequate sites, the City will assess and provide incentives, as appropriate.

Objectives:

- Adopt incentives for residential development on sites that permit both residential and nonresidential uses.

Timeframe: Identify incentives and adopt appropriate regulatory amendments within 12 months of adopting a Certified Housing Element, provide annual review of incentives and adjust as appropriate

Responsible Agency: Planning Division

Funding Sources: General Fund

Housing Program 4G: Permit Processing and Findings

The City's planning review process varies from application to application and the review time may differ based on the completeness of applications. The current permit processing procedures are not identified to be a constraint on the development of housing; however, the City seeks to continuously improve approval certainty and cost. The City will annually review its procedures and general review timing for potential impacts on cost and approval certainty for development projects.

The City's findings for granting permits includes subjective language which may lead to potential project denials and longer processing time. The City will review its application findings and address subjectivity by modifying the findings to include objective language within two years of adoption of the Housing Element.

Objectives:

- Annually review procedures and general review timing for potential impacts on cost and approval certainty for development projects.
- The City will review its application findings and address subjectivity by modifying the findings to include objective language within two years of adoption of the Housing Element.

Timeframe: Annually review permit processing procedures and, if necessary, make changes within one year. Within two years modify subjective findings language.
Responsible Agency: Planning Division
Funding Sources: General Fund

Equal Housing Opportunity

To fully meet the community's housing needs, the City must assure that housing is accessible to all residents, regardless of race, religion, family status, age, or physical disability.

Housing Goal #5: Promote equal opportunity for all residents to reside in the housing of their choice.

Policy 5.1: Continue to enforce fair housing laws prohibiting arbitrary discrimination in the building, financing, selling, or renting of housing based on race, religion, family status, national origin, disability, or other protected class.

Policy 5.2: Ensure that residents are aware of their rights and responsibilities regarding fair housing.

Policy 5.3: Continue to cooperate with the Inland Mediation Board to enforce fair housing laws and provide fair housing education services.

Policy 5.4: Affirmatively Further Fair Housing in Rialto.

Policy 5.5: Promote inclusive communities and equitable quality of life through development of affordable housing that is justly available throughout the whole community.

Housing Program 5A: Affirmatively Furthering Fair Housing

Pursuant to AB 686, Chapter 958, Statutes 2018, the City will affirmatively further fair housing by taking meaningful actions in addition to resisting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected classes, as defined by State law.

To accomplish this, the City or designated contracted organization will collaborate with local and regional organizations to review any housing discrimination complaints, assist in dispute resolution, and, where necessary, refer complainants to appropriate state or federal agencies for further investigation, action, and resolution.

Section 3 of this Housing Element contains an analysis of fair housing activities in Rialto and the San Bernardino County region.

The analysis found that:

- There is one racially or ethnically concentrated census tracts (R/ECAPS) within Rialto as identified by HUD. These identified census tracts have at least 50 percent non-white populations with a poverty rate that exceeds 40 percent and/or is three or more times the average tract poverty rate for the metropolitan area.
- The UC Davis Regional Opportunity Index shows that the majority of residents within Rialto have low to moderate achievement opportunities and access to opportunities. Additionally, analysis of the TCAC/HCD Opportunity Area Maps show that the majority of the City is categorized as low to moderate resource, meaning there is low access to essential resources for existing residents.
- The City of Rialto has two census tracts reporting high segregation and poverty, in addition to low opportunity ratings and higher environmental burdens. The existing residential uses in these two census tracts are predominantly older, single-family residences and some multi-family developments among mostly industrial and downtown commercial uses.
- The City has the highest unemployment rate in the region and approximately 39 percent of households earn less than $50,000 annually. In comparison, the City only has a limited total number of deed-restricted affordable units (1,049 total units).

Approximately 78 percent of the City's existing housing stock was built prior to recent amendments to the Fair Housing Act, which provides for additional opportunities to persons with disabilities. As a result, persons with disabilities may face challenges securing accessible housing in Rialto. The City will continue to collaborate with the community, stakeholders, and appropriate organizations to address potential constraints to fair housing. This may include, but may not be limited to:

- Analysis and identification of barriers to entry into homeownership or rental opportunities,
- Review of historic policies or restrictions that may have prevented and/or may still prevent disadvantaged groups from locating in Rialto,
- Specific actions that contribute to Rialto's ability to foster a more inclusive community to all racial, social, and economic groups.

During the planning period, the City will take the following explicit actions to address and implement Fair Housing issues and to affirmatively further fair housing in the community:

Table 4-1: AFFH Actions

Contributing Factor	Specific Commitments	Timeframe	Geographic Target	Metrics and Timelines
Action Area - Housing Mobility				
Availability of Affordable Housing	1. Outreach to landlords to expand the location of participating voucher properties.	Annually outreach and host one meeting	City-wide with focus on the Central Area and Foothill Area	Recruit at least 5 landlords to become a participating voucher property by December 2026 Evaluative Metric(s): • Reduce voucher waitlist by 10% annually • Increase landlord participation by 5% annually • Seek to assist 250 lower income households in higher resource areas
	2. Create and promote an affordable rental registry.	Complete by December 2025, annual review and update as necessary	City-wide with focus on the Central and Foothill Areas and higher resources areas to the north	Publish the registry and assist households in accessing affordable housing through the registry. Evaluative Metric(s): • Assist up to 50 lower income residents on an annual basis
	3. Create an Affordable Housing Database and Outreach toolkit to help lower income families match opportunities based on individual needs	Develop database and toolkit by December 2025.	High / Central Area of City	Develop database and toolkit by December 2025. Evaluative Metric: • Aspire to assist 250 lower income families on an annual basis.
	4. Encourage collaboration between local government and community land trusts as a mechanism to develop affordable housing in higher-opportunity areas.	Annually outreach and host one meeting	Areas of higher opportunity	Gather interest from at least one agency or organization throughout the Planning Period. Evaluative Metric(s): • Participation by at least one agency annually

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
	5. Annually review the Sites Inventory and the location of new, affordable housing development. Promote equal and fair housing development practices by annually reviewing to make sure there remains opportunities for affordable housing development throughout the whole City.	Annually review candidate sites and meet with the developer community at least once every two years.	City-wide	Annual meetings. Evaluative Metric(s): • Participation by at least 5 affordable housing developers
	6. Encourage expansion of opportunity in low resource areas through annual participation by developers	Annually market infill, mixed used and affordable residential development to affordable housing developers	Focus area along Riverside Avenue and Foothill Boulevard	Annual participation by affordable housing developers in low resource corridors. Evaluative metric(s): • Participation by one affordable housing developer along corridor annually
	7. Develop a program of assistance with security deposits and moving expenses for voucher holders and other low-income tenants	Coordinate with county, state and federal agencies to develop assistance program	Target voucher holders and tenants	Develop program by December 2025. Evaluative metric(s): • Assist up to 15 new residents on annual basis
	8. Established goals for increased affordable housing production will geographically target TCAC Low Resource/High Segregation & Poverty areas for special engagement and strategic action.	Adopt Housing Programs by next Planning Cycle	City-wide The City is identified by TCAC as low resource, and that even within certain areas identified as Moderate Resource, there are limited development or redevelopment opportunities. The spread of RHNA inventory shows that lower income units are	Various Housing Programs have been adopted to facilitate the development of affordable housing and a variety of housing to all income and household sizes. Housing Goal #2: Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the
	9. Establish a Program focused on tenant protections, displacement, and/or equity and geographically target TCAC High Segregation and Poverty and Urban Displacement Low-Income/Susceptible to Displacement areas for special engagement and strategic action.			

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
	10. Establish Program that identifies goals for increased Housing Authority investment and support and geographically target TCAC High Segregation and Poverty areas for special engagement and strategic action.		not only allocated to low resource areas, but also in moderate resource areas, ensuring an equitable and fair distribution of affordability across the City.	community and region. Housing Goal #4: Alleviate potential governmental constraints to housing production and affordability. Housing Goal #5: Promote equal opportunity for all residents to reside in the housing of their choice. • Program 2A: Provide Adequate Sites to Accommodate the RHNA • Program 2B: Rezone to Provide Adequate Sites to Accommodate RHNA • Program 4B: Remove Development Constraints • Program 5A: Affirmatively Furthering Fair Housing
Housing Opportunities	1. Update, analyze and identify regulations that may have historically contributed to the disparities in access to housing and propose innovative solutions such lot configuration, affordability covenants and lot splits to encourage diversified development and support opportunities for wealth building through home ownership.	Complete by June 2026, Annually review and update as necessary	City-wide and neighborhood specific	Publish a report on the analysis and findings. Evaluative Metric(s): • Code Updates based upon report findings within 1 year or report
Lending Discrimination	1. Proactively outreach to financial institutional partners, including banks, credit unions and other applicable organizations/	2 Workshops or Meetings by December 2026.	City-wide	Two Fair housing workshops by December 2026. Coordinate with IFHMB

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
	entities to identify ways to discourage discrimination in underwriting and lending to Rialto households.	Annual stakeholder meeting and outreach collateral by June 2026.		to provide marketing collateral by December 2025. Host one annual stakeholder meeting with local lenders and realtors to improve education. Establish a fair housing FAQ by December 2025. Evaluative Metric: • Seek to contact at least 50% of population with higher complaint rates, in conjunction with proactively addressing complaints • Coordination with 2 institutions annually
	2. At the mid-point of the 6th Cycle planning period, evaluate the effectiveness of these strategies in promoting housing opportunities throughout the City, outside of Focus areas and in the north and southern portions of the City	Summary Report complete by April 2026	Medium / Citywide with focus on the south and north areas	By April 2026, provide summary report of effectiveness in conjunction with annual APR. Based on findings, make necessary changes/amendments within 1 year. Evaluative Metric: • Aspire to achieve overall goal of 250 units.
	3. Provide post move services such as regular check in, resource coordination and landlord/tenant mediation to help keep families living in areas of opportunity	Develop internal administrative guidance and coordinate with county services by June 2026.	High / Central Area of City	Develop internal administrative guidance and coordination with county services by June 2026. Evaluative Metric:

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
				• Aspire to assist 250 lower income families on an annual basis.
	4. Support voucher mobility programs that include: • Timely inspections • Providing adequate time for a family to conduct a housing search • Customer service for both landlords and program participants • Ensuring voucher subsidies' maximum limits are high enough to rent in higher-opportunity neighborhoods • Working collaboratively with county and streamlining the portability process to move across jurisdictions	Set up program framework by June 2026	Med / Central and South Areas	Coordinate with the County to assist with improving voucher mobility at local level by: • Identifying local staff to commit to 25% administrative function to support voucher mobility programs by June 2026. • Establishing a customer service framework including dedicated phone number, email and contact information by June 2026. • Establishing an annual monitoring program to evaluate success of voucher mobility program by June 2026. Provide for annual program amendments as necessary. Evaluative Metric: • Aspire to serve up to 50% of annual voucher

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
				recipients with an expressed need for assistance.
	5. Adopt an Ordinance to expand the housing supply in single-family zones by allowing for lot splits and duplexes under the parameters of SB 9. In coordination with research being conducted at the State level, evaluate and pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9.	Adopt Ordinance by 2024	Medium/ Areas not identified as RHNA focus areas.	Adopt Ordinance by 2024 Evaluative Metric: • Aspire to serve up to 250 housing opportunities affordable to lower income households
	6. Coordinate with San Bernardino County Housing Authority regarding enhancements to mobility counseling programs in Rialto. This program would market landlords and property owners and inform Housing Choice Voucher holders about their residential options in areas throughout the City and provide holistic support to voucher holders seeking to move to areas outside of focus.	Coordinate with County of San Bernardino in 2025 to develop program framework. Execute local actions in 2025 and 2026.	Medium / North, South and Central Focus Areas.	Coordinate with County of San Bernardino in 2025 to develop program framework. Execute local actions in 2025 and 2026. Evaluative Metric: • Overall goal will be to increase Housing Choice Vouchers by 10% and through implementation of the City's SB 9 ordinance, seek to integrate at least five units annually in areas outside of focus areas.
	7. Research and pursue the development and funding of a program that would provide low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 80% of the Area Median Income to develop	Develop Program by June 2026	Medium / Areas outside of focus areas, in Single Family neighborhoods.	By June 2026 develop program framework. By December 2026 develop and implement pilot program. Implement annually thereafter. Evaluative Metric:

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
	accessory dwelling units with affordability restrictions on their property.			• Aspire to achieve at least 5 deed restricted ADU's annually.
	8. Research and pursue a homesharing program, including research and coordination with non-profit and other organizations to assist with matching tenants with existing homeowners. The City will market and take other actions as necessary at least annually with the goal of five opportunities per year.	Develop Program by June 2026	Med / Citywide	Develop homeshare program framework by June 2026. Evaluative Metric: • Aspire to create at least five opportunities on an annual basis.
	9. The City will explore and pursue alternative land use strategies and make necessary amendments to zoning or other land use documents to facilitate a variety of housing choices, including but not limited to higher density opportunities on religious, institutional and quasi-institutional lands, missing middle zoning in addition to SB 9 such as SB 10, adaptive reuse, more than one JADU per structure, acquiring and adding affordability to existing structures and upzoning.	Identify strategies in 2025 and make regulatory changes by June 2026	Medium / Citywide	Research and identify alternative land use strategies by December 2025. Identify and implement policy and regulatory changes by June 2026. Evaluative Metric: • Aspire to create 50 housing opportunities in the planning period.
	10. Research and pursue funding opportunities at least every other year to make accessibility improvements to homes and community infrastructure.	Research in 2023. Identify 1 funding source annually beginning in 2024	Medium/Citywide	Identify annual funding opportunity Evaluative Metric: • At least one new funding opportunity annually

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
	11. Develop incentives or other strategies to promote housing choices and affordability in all development throughout the City.	Develop and market incentives by December 2025.	Medium / Citywide with focus on the Central Area	Develop and market incentives by December 2025. Evaluative Metric: • Aspire to identify up to 5 strategies to be implemented in the planning period.
	12. Require standards or provide incentives and utilize other strategies to promote affirmative marketing plans in all new developments outside of focus areas. The affirmative marketing plan will consider regional housing registries and ensure marketing materials for new developments are designed to attract renters and buyers of diverse demographics, including persons of any race, ethnicity, income, disability and familial status.	Develop and market incentives by December 2025.	Medium / Areas outside of RHNA focus areas	Develop and market incentives by December 2025. Evaluative Metric: • Aspire to assist up to 250 residents in the planning period.
Action Area: Housing Choice and Affordability in Areas of Opportunity				
R/ECAPs and Environmental Justice	1. Adopt an Environmental Justice Element.	Adopted in 2024.	City-wide	Adopted anEnvironmental Justice Element in 2024.
	2. Engage community health workers to conduct ground level site visits and meetings within identified census tracts to better understand resident and business barriers, resources, and needs.	Complete by December 2025, annual review and update as necessary	Vulnerable census tract to be determined with focus on the Central area and Foothill corridor	Conduct one workshop in each area identified by December 2025. Establish specific set of actions to address identified barriers by May 2026. Evaluative Metric(s): • Annual summary report and reduction of incidences of poverty for 150

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
				households on an annual basis
Housing for Persons with Disabilities	1. Promote accessibility modification programs and other measures that proactively enhance accessibility, including creating informational materials.	Complete by December 2025	City-wide	Promote informational materials on assistance available and make available to public by December 2025. Evaluative Metric(s): • Reach at least 50% of disabled population on an annual basis.
Access to Opportunities	1. Facilitate entrepreneurship opportunities to create economic opportunity with limited investment, such as home-based businesses. The City will collaborate with the Chamber of Commerce to establish policies and programs supportive of local employment opportunities.	Complete by June 2026	City-wide	Establish policies and programs supportive of local employment opportunities. Develop outreach collateral by June 2026. Conduct annual meeting with Chamber of Commerce. Evaluative Metric(s): • Seek to assist 50 new business creations annually in the City.
	2. Increase outreach to local school districts, vocational schools and other public and private education and job training entities. The City will outreach to and conduct annual meetings with these entities to discuss the housing needs and improving opportunity access, especially to lower income households located in low resource areas. The City will maintain compliance with Fair Housing Laws and Regulations.	Annual meetings with Rialto Unified School District (RUSD). Annual review and amendment of City place based strategies.	City-wide w/ focus in areas of low opportunity and prevalence of lower income households	Collaborate with RUSD and local educational institutions to increase local scoring. Meet annually with RUSD to determine City of Rialto contributions to placed based strategies. Provide for annual meetings to assess progress to achieve parity with comparable scores regionally and statewide. Provide for annual meeting with RUSD to identify housing sites

Table 4-1: AFFH Actions				
Contributing Factor	**Specific Commitments**	**Timeframe**	**Geographic Target**	**Metrics and Timelines**
				and additional economic development opportunities for students and families. Establish general policies, such as safe routes to schools, afterschool programs and other place-based strategies in consultation with RUSD. Evaluative Metric(s): • Reach at least 500 lower income residents on an annual basis
Additional Multifamily Opportunities	1. Update, analyze, and identify regulations that may have historically contributed to the disparities in access to housing and propose innovative solutions such as, but not limited to, lot configuration, affordability covenants, and lot splits to encourage diversified development and support opportunities for wealth building.	Conduct community workshops by June 2026	Northern Planning Area As shown in Figure 3-28, the Northern Planning area shows the least amount of diversity in RHNA sites. The Northern Planning is characterized as higher income. The City will place priority on these areas while also addressing affordability issues throughout Rialto.	Maintain and update candidate sites list and annually provide opportunities to relevant agencies and organizations. Offer collaboration and assistance. Evaluative Metric: • Target outreach to census tracts with low access and low-income to conduct two community workshops within the first half of the planning period. • Update candidate sites list annually at time of APR. • Assist or provide information to at least 5 developers annually.
Action Area: Place-Based Strategies – Conservation and Revitalization				
Public Investment in Specific Neighborhoods	1. Target investment in areas of most need focused on improving community assets such as schools, recreational	Annually review and seek funding opportunities and partnerships	Targeted area in the Central, Gateway Area, Foothill areas	Annual review and CIP programming to target investment. Prioritize inclusion of target areas

	facilities and programs, social service programs, parks, streets, active transportation and infrastructure			for CIP programs each year. From April 14th to July 14th, 2025, a series of roadway reconstruction and concrete improvements will be completed in segments. These upgrades are designed to improve both roadway and pedestrian safety while supporting the City's ongoing growth and future development. The improvements will include: Casa Grande Drive, Bloomington Avenue, and Maple Avenue. These improvements directly benefit existing and future residents of identified Housing Element sites. Evaluative Metric(s): • Identify at least one CIP priority project on an annual basis.
	2. Dedicate or seek funding to prioritize basic infrastructure improvements (e.g., sidewalks) in disadvantaged communities.	Annually review and seek funding opportunities	Targeted area in the Central, Gateway Area, Foothill areas	Include capital projects from each of the target areas in annual CIP program. Update annually. Evaluative Metric(s): • Identify at least one CIP priority project on an annual basis.
	3. Coordinate with other external governmental agencies and other organizations in addressing areas of high need.	Bi-annually meet with agencies and organizations. Identify invitees by June 2026. Conduct annual meetings thereafter.	Targeted area in the Central, Gateway, and Foothill areas	Coordinate with at least one agency or organization in the Planning Period. Establish annual priority list of actions to identify place-based strategies such as the Merrill

				Avenue Safe Routes to School Improvements Project. Key improvements include: • Upgrading curb ramps to ADA standards on E. South Street/Acacia Avenue. Carter Street, Huff Street, and Orchard Street (between Sycamore Avenue and Sage Avenue) • Adding sidewalks and maintaining driveways on Carter Street, Orchard Street, and Huff Street (between Sycamore Avenue and Sage Avenue). • Improving and adding sidewalks on South Street between Sycamore Avenue and Acacia Avenue. Evaluative Metric(s): • Identify at least one CIP priority project on an annual basis in target areas.
	4. Recruit residents from areas of concentrated poverty to serve on boards, committees, task forces, and other local government decision-making bodies.	Promote opportunities as they become available	Areas of concentrated poverty	Recruit at least two persons from areas of concentrated poverty throughout the Planning Period. Evaluative Metric(s): • Annual participation by at least two residents
	5. Dedicate or seek funding to prioritize basic infrastructure improvements (e.g., water, sewer) in disadvantaged communities	Include in annual CIP programming beginning in July 2024.	High / Central and South Areas	Develop CIP program funding objectives related to housing and include in annual CIP

				programming beginning in July 2024. Evaluative Metric: • Aspire to achieve at least 2 CIP program actions on an annual basis.
	6. Address negative environmental, neighborhood, housing and health impacts associated with siting and operation of land uses such as industrial, agricultural, waste storage, freeways, energy production, etc. in disadvantaged communities	Establish a risk assessment toolkit by June 2025.	High / Central and South Areas	Evaluate and establish a risk assessment toolkit by June 2026. Provide to all future development projects to address fair housing and environmental justice concerns. Continue to implement the Environmental Justice Element and Climate Adaptations objectives and goals. Evaluative Metric: • Aspire to utilize toolkit in all new development which may have an effect on disadvantaged communities
	7. Establish measures such as urban forestry, flood prevention measures, etc. in disadvantaged communities	Implement Plan by January 2026	High / Central East Area	Identify measures by June 2025. Implement actions in local specific plans and other land use plans by January 2026, as applicable. Evaluative Metric: • Include at least 2 measures in each of the RHNA focus areas

	8. Enhance proactive code enforcement program to target areas of concentrated rehabilitation needs, results in repairs and mitigates potential cost, displacement and relocation impacts on residents	Execute proactive plan by January 2026.	High / Central and South Areas	Establish and identify priority code enforcement areas and execute proactive plan by January 2026. Evaluative Metric: • Aspire to identify and address up to 50 deferred maintenance or code violations within code enforcement focus area • Review the proactive code enforcement program annually and adjust as needed. • Refer households in need to assistance – assist at least 3 households per year.
	9. Targeted investment in areas of most need focused on improving community assets such as schools, recreational facilities and programs, social service programs, parks, streets, active transportation and infrastructure	Develop Program by January 2024	High / Central and South Areas	Develop CIP program objectives related to housing and include in annual CIP programming beginning in 2024. Aspire to achieve at least 2 CIP program actions on an annual basis.
Housing for Persons with Disabilities	1. Review and revise the development code for Reasonable Accommodations Findings as appropriate to mitigate impediments to fair housing.	Revise Code by June 2025	City-wide	Revise Code by June 2025
	2. The City will continue to review and prioritize the approval of reasonable accommodations requests on a case-by-case basis	By June 2025	City-wide	Assist a minimum of 10 individuals or households.
Action Area: Place-Based Strategies – Environmental Justice Policies				
	• Review zoning, permit streamlining, fees, incentives	Evaluate and Identify	High-opportunity areas	Make applicable adjustments to city

Environmental Justice Discrepancy	and other approaches to increase housing choices and affordability (e.g., duplex, triplex, multifamily, ADU, transitional and supportive housing, group homes) in high opportunity areas and areas that may be more impacted by environmental factors and adjust policies and regulations as necessary to address potential environmental justice issues. • Evaluate potential environmental justice issues influenced by the location and distribution of housing in areas that may expose residential to environmental impacts. Evaluate policy methods and strategies to significantly reduce and/or eliminate potential environmental justice issues	strategies in 2024 and make initial regulatory changes by June 2025	Areas with existing of planned residential adjacent to uses or activities that may exhibit environmental issues.	policies and programs within 12 months, if adjustments are required and applicable. Evaluative Metric: • If adjustments are necessary, revise within 12 months of annual review.
	Ensure heavy industrial activities are sufficiently separated from residential neighborhoods, schools, and other sensitive areas by requiring new industrial developments to incorporate measures such as vegetative barriers to mitigate air pollution from stationary and mobile sources.	Ongoing implementation of the Environmental Justice Element	Citywide (all lowest percentile for environmental factors)	Implement strategies related to toxic air contaminants with the goal of improving tracts' CalEnviroScreen scores by at least five percentile points by 2030.
	Expand opportunities for urban and community food growing activities by removing barriers that exist in the current zoning code and creating a clear development framework. Establish clear, and easy to understand development standards that communicate how urban agricultural activities are allowed and where.	Ongoing implementation of the Environmental Justice Element	Citywide with an emphasis on Disadvantaged communities as identified in the EJ Element.	Remove barriers that exist in the current zoning code and create a clear development framework by December 2026.
Safe Routes to School	Prioritize Safe Routes to School (SRTS) in areas most affected by extreme heat and air pollution.	During the City's annual CIP planning, identify at least one SRTS improvement project in areas most affected by extreme heat and air pollution as identified by	Disadvantaged communities as identified in the EJ Element and areas most affected by extreme heat and air pollution as identified by the	Annually identify at least one SRTS project in the City's CIP as funding allows. Annually apply for funding to support SRTS projects. Evaluative Metric: Apply for funding for SRTS projects annually

		the City's Climate Adaptation Plan.	City's Climate Adaptation Plan.	and on an ongoing basis. Goal of securing funding and implementing at least one SRTS project per year.
Safe Corridors	Create shaded and safe corridors between transit stops and important community services, including cooling centers, job centers, and residential areas where people depend on transit.	During the City's annual CIP planning, identify at least one "safe corridor" improvement project in areas most affected by extreme heat and air pollution as identified by the City's Climate Adaptation Plan and targeted areas in the City's Active Transportation Plan (ATP).	Disadvantaged communities as identified in the EJ Element, areas most affected by extreme heat and air pollution as identified by the City's Climate Adaptation Plan, and target areas identified in the City's ATP.	Annually identify at least one "safe corridor" project in the City's CIP as funding allows. Annually apply for funding to support "safe corridor" projects. Evaluative Metric: Apply for funding for "safe corridor" projects annually and on an ongoing basis. Goal of securing funding and implementing at least one "safe corridor" project per year.
Active Transportation Improvements	Implement bikeway improvements in Disadvantaged Communities, as outlined in the San Bernardino County Non-motorized Transportation Plan and the City's ATP, prioritizing those with shade improvements where the right-of-way allows. Add parklets with mature trees along routes where feasible.	During the City's annual CIP planning, identify at least one "Active Transportation" improvement project in areas most affected by extreme heat and air pollution as identified by the City's Climate Adaptation Plan and targeted areas in the City's Active Transportation Plan (ATP).	Disadvantaged communities as identified in the EJ Element, areas most affected by extreme heat and air pollution as identified by the City's Climate Adaptation Plan, and target areas identified in the City's ATP.	Annually identify at least one "Active Transportation Improvement" project in the City's CIP as funding allows. Annually apply for funding to support projects. Evaluative Metric: Apply for funding for "Active Transportation Improvements" projects annually and on an ongoing basis. Goal of securing funding and implementing at least one project per year.
Open Space and Parks	Link new open space and park sites in reclaimed mining areas with bicycle trails integrated into the City's recreational trails system (Land Use, Community Design, Open Space, and Conservation Element Policy 2-25.1). Consider sources of air pollution when siting the bicycle trails, including truck routes, freeways, and industrial uses in an	Ongoing, as opportunities arise.	Reclaimed mining areas and disadvantaged communities as identified in the EJ Element.	Annually evaluate the feasibility of new open space or park areas. Annually apply for funding to develop new open space or park areas. Evaluative Metric:

	effort to reduce or avoid environmental burdens in disadvantaged communities as identified in the EJ Element.			Apply for funding for new open space or park areas projects annually and on an ongoing basis. Goal of securing funding and developing at least one new open space or park area in the 6th Cycle.
	Goal to achieve a park ratio of 3.0 acres per 1,000 residents, with evenly distributed park facilities throughout the community, and establish strategies for funding facilities and maintenance (Land Use, Community Design, Open Space, and Conservation Element Policy 2-28.1). Within this plan, consider the 30x30 initiative, particularly related to wildlife corridors and protection of biodiversity in City open spaces.	During the City's next Parks Master Plan	Disadvantaged communities as identified in the EJ Element, areas most affected by extreme heat and air pollution as identified by the City's Climate Adaptation Plan, and target areas identified in the City's ATP.	Annually evaluate the feasibility of new open space or park areas. Annually apply for funding to develop new open space or park areas. Evaluative Metric: Apply for funding for new open space or park areas projects annually and on an ongoing basis. Goal of securing funding and developing at least one new open space or park area in the 6th Cycle.
	Identify locations, community partners, and funding opportunities to create pocket parks within urbanized areas for public and/or private use. Consider incentives for privately-owned and maintained public open spaces.	Ongoing, as opportunities arise.	Targeted in disadvantaged communities as identified in the EJ Element, areas most affected by extreme heat and air pollution as identified by the City's Climate Adaptation Plan, and target areas identified in the City's ATP.	Annually evaluate the feasibility of new open space or park areas. Annually apply for funding to develop new open space or park areas. Evaluative Metric: Apply for funding for new open space or park areas projects annually and on an ongoing basis. Goal of securing funding and developing at least one new open space or park area in the 6th Cycle.
Sidewalk Improvements	Identify sidewalk improvements in disadvantaged communities consistent with Circulation Element Policy 4-9.1 when creating the CIP annually to ensure the CIP proportionally improves disadvantaged communities.	During the City's annual CIP planning Identify sidewalk improvements in disadvantaged communities	Disadvantaged communities as identified in the EJ Element, areas most affected by extreme heat and air pollution as	Annually identify at least 3 sidewalk improvements in disadvantaged communities consistent with Circulation Element Policy 4-9.1 in the City's

		consistent with Circulation Element Policy 4-9.1.	identified by the City's Climate Adaptation Plan, and target areas identified in the City's ATP.	CIP as funding allows. Annually apply for funding to support projects. Evaluative Metric: Apply for funding sidewalk improvements in disadvantaged communities consistent with Circulation Element Policy 4-9.1 annually and on an ongoing basis. Goal of securing funding and implementing at least 3 sidewalk improvement projects per year.
Public Improvements	Require the use of attractive street furniture (benches, trash receptacles, planters, bicycle racks) in highly visible areas such as along Foothill Boulevard to communicate the City's identity and pride, consistent with Land Use, Community Design, Open Space, and Conservation Element Policy 2-13.1. Ensure the placement of this street furniture meets ADA compliance for pathway width.	During the City's annual CIP planning Identify public improvements in disadvantaged communities consistent with the City's EJ Element and along Foothill Blvd.	Disadvantaged communities as identified in the EJ Element, Foothill Blvd.	Annually identify at least 3 public improvements in disadvantaged communities and along Foothill Blvd in the City's CIP as funding allows. Annually apply for funding to support projects. Evaluative Metric: Apply for funding public improvements in disadvantaged communities and along Foothill Blvd annually and on an ongoing basis. Goal of securing funding and implementing at least 3 public improvement projects per year.
	Consistent with Land Use, Community Design, Open Space, and Conservation Element Policy 2-25.2, landscape the areas surrounding the Cactus Basin recreation fields, water reservoirs, and publicly owned facilities to increase opportunities for low-intensity, passive recreation open spaces or temporary uses such as food vending, public art, or public gathering.	During the City's annual CIP planning Identify funding for public improvements that benefit the Rialto community.	Areas surrounding the Cactus Basin recreation fields, water reservoirs, publicly owned facilities, and disadvantaged communities as identified in the EJ Element.	Annually identify at least one public improvement in targeted areas in the City's CIP as funding allows. Annually apply for funding to support projects. Evaluative Metric: Apply for funding public improvements in targeted areas on an

				ongoing basis. Goal of securing funding and implementing at least one public improvement project per year.
Protection from Displacement				
Anti-Gentrification and Displacement	1. Explore and implement anti-gentrification policies and regulations to combat displacement, which especially effect low-income residents and communities of color.	Complete by December 2025. Annual review and update as necessary	Targeted neighborhoods at risk of displacement.	Identify policies and publish a memo on the findings and proposed solution. Evaluative Metric(s): • Reduce occurrence of displacement risk by 10% on an annual basis.

Timeframe: Review annually, amend actions and modify Municipal Code as necessary to continue to affirmatively further fair housing and comply with State Housing Laws and Fair Housing Laws and Regulations.
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 5B: Fair Housing Services

The City will continue to provide fair housing services through the Inland Fair Housing and Mediation Board. The ongoing contract provides Rialto residents with the following fair housing services: shared housing information for senior residents, counseling and information on housing discrimination, tenant/landlord dispute resolution, bilingual housing literature, and testing for housing discrimination. The City will continue to provide informational and educational materials on fair housing services for property owners, apartment managers, and tenants at City Hall and the City's website. The City will also continue to monitor and respond, as appropriate, to complaints of discrimination, and will refer tenants to the Inland Fair Housing and Mediation Board for proper intake investigation and resolution of fair housing complaints.

Objectives:

- Continue to provide fair housing services through the Inland Fair Housing and Mediation Board.
- Provide informational and educational materials on fair housing services for property owners, apartment managers, and tenants at City Hall and online.
- Monitor and respond, as appropriate, to complaints of discrimination, and refer tenants to the Inland Fair Housing and Mediation Board for proper intake investigation and resolution of fair housing complaints.

Timeframe: Continue annual dissemination of information. Modify dissemination as necessary based on annual review.
Responsible Agency: Community Development Department, Inland Fair Housing and Mediation Board
Funding Sources: Inland Fair Housing and Mediation Board, General Fund

Housing Program 5C: Reasonable Accommodation

Pursuant to Government Code Section 65583, the City of Rialto adopted formal Reasonable Accommodation Ordinance in 2020. The City is obligated to remove potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities. The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. Reasonable accommodation provides a basis for residents with disabilities to request flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or requirements from the local government to ensure equal access to housing opportunities. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be "reasonable" based on fair housing laws and case law interpreting the statutes. The City of Rialto encourages and promotes accessible housing for persons with disabilities. In general, City Staff takes into consideration the provisions of the California Americans with Disabilities Act (Cal ADA) in the review and approval of housing projects and grants modifications and deviations from the Municipal Code to accommodate the needs of persons with disabilities.

The City will provide information about its formal reasonable accommodation procedures at City Hall and on the City's website and monitoring procedures and requirements annually. If during the annual review changes are necessary, the City will amend its existing Ordinance, as appropriate.

Objectives:

- Encourage and promote accessible housing for persons with disabilities.
- Provide information about reasonable accommodation procedures at City Hall and online, and monitoring procedures and requirements annually.

Timeframe: Review annually
Responsible Agency: Planning Division
Funding Sources: General Fund

Policy Program 5D: Emergency Shelters, Transitional and Supportive Housing

To comply with State law, the City of Rialto will amend certain sections of its Municipal Code to address the following requirements:

- Supportive Housing Streamlined Approvals (AB 2162) - To comply with AB 2162 (Chapter 753, Statues 2018), the City of Rialto will amend its Municipal Code to permit supportive housing as a use permitted by right in all zones where multiple family and mixed-use development are permitted.
- Emergency and Transitional Housing Act of 2019 (AB 139) – The City will update its Municipal Code to comply with the requirements of Gov Code 65583 to address permit requirements, objective standards, analysis of annual and seasonal needs, and parking and other applicable standards and provisions.

- Amend the City of Rialto Municipal Code to comply with the definitions for "Supportive Housing," Supportive Services," and "Target Population" consistent with applicable sections of the California Government Code.
- Amend the Rialto Municipal Code to ensure Emergency Shelters and Transitional and Supportive Housing are permitted in appropriate zones, consistent with State law.

Timeframe: Within 12 months of the adoption of the Certified Housing Element
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 5E: Supportive Housing / Low Barrier Navigation Centers

State law has been updated to require approval 'by right' of certain supportive housing and low barrier navigation centers that meet the requirements of State law. Low barrier navigation centers are generally defined as service-enriched shelters focused on the transition of persons into permanent housing.

Low barrier navigation centers are service-enriched shelters providing temporary living facilities for persons experiencing homelessness or at risk of becoming homeless. Low Barrier Navigation Centers connect individuals to income, public benefits, health services, shelter, and housing. To comply with State law, the City of Rialto will adopt policies, procedures, and regulations for processing this type of use to establish a non-discretionary local permit approval process that must be provided to accommodate supportive housing and lower barrier navigation centers per State law. In the interim, any submitted application for this use type will be processed in accordance with State law.

The City will provide for annual monitoring of the effectiveness and appropriateness of existing adopted policies. Should any amendments be warranted to existing policies pursuant to State law, the City will modify its existing policies, as appropriate.

Objectives:

- Adopt policies, procedures, and regulations for processing supportive housing and low barrier navigation centers to establish a non-discretionary local permit approval process.
- Annually monitor the effectiveness and appropriateness of existing adopted policies.

Timeframe: Amend Zoning Code within 12 months of Housing Element adoption
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 5F: Housing for Persons with Developmental Disabilities

The housing needs of persons with developmental disabilities are typically not fully addressed by local zoning regulations. Persons with disabilities may require, in addition to basic affordability, slight modifications to existing units, and in some instances, a varying range of supportive housing facilities. To accommodate residents with developmental disabilities, the City will review and prioritize housing construction and rehabilitation including supportive services targeted for persons with developmental disabilities. The City will also seek State and Federal funding, as available, in support of housing construction and rehabilitation targeted for persons with developmental disabilities.

Rialto will also explore the granting of regulatory incentives, such as expedited permit processing, and fee waivers and deferrals, to projects targeted for persons with developmental disabilities. To further

facilitate the development of units to accommodate persons with developmental disabilities, the City will reach out annually to developers of supportive housing to encourage development of projects targeted for special needs groups. As housing is developed or identified, Rialto will collaborate with the Inland Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities. Additionally, the City will review its reasonable accommodations findings to identify any potential constraints to persons seeking accessible housing. The City will revise or modify the approval findings to ensure no constraints on housing for persons with disabilities. The City will provide information at City Hall and on the City's website.

Objectives:

- Review and prioritize housing construction and rehabilitation including supportive services targeted for persons with developmental disabilities.
- Seek State and Federal funding, as available, in support of housing construction and rehabilitation targeted for persons with developmental disabilities.
- Explore the granting of regulatory incentives, such as expedited permit processing, and fee waivers and deferrals, to projects targeted for persons with developmental disabilities.
- Annually outreach to developers of supportive housing to encourage development of projects targeted for special needs groups.
- Review or modify reasonable accommodations findings to remove constraints to persons seeking accessible housing.

Timeframe: Evaluate Zoning Code within 12 months of adopting a Certified Housing Element, adopt amendments within 12 months, provide an annual update on programs to encourage the development of housing for persons with developmental disabilities as part of the City's Annual Report review and documentation

Responsible Agency: Planning Division/Inland Regional Center

Funding Sources: General Fund

Housing Program 5G: Agricultural Employee and Farmworker Housing

The City will amend the Rialto Municipal Code to be in compliance with Health and Safety Code, 17021.5, 17021.6 and 17021.8. and define agricultural employee housing in a manner consistent with applicable Health and Safety Code sections. The Municipal Code will be revised to state that employee housing for six or fewer employees will be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Additionally, the Municipal Code will be updated to state that employee housing consisting of no more than 12 units or 36 beds will be permitted in the same manner as other agricultural uses in the same zone.

The City will also amend the Municipal Code to explicitly define Farmworker Housing and establish it as permitted use in residential or nonresidential zones, consistent with State law.

Objectives:

- Amend the Rialto Municipal Code to be in compliance with Health and Safety Code, 17021.5, 17021.6 and 17021.8. and define agricultural employee housing in a manner consistent with applicable Health and Safety Code sections.

Timeframe: Adopt Code Amendments with 12 months of Housing Element Adoption
Responsible Agency: Planning Division
Funding Sources: General Fund

Housing Program 5H: Residential Care Facilities

State Law defines residential care facilities as any family home, group care facility or similar facility for 24-hour non-medical care of persons in need of personal services supervision or assistance essential for sustaining activities of daily living for the protection of the individual. Such uses are permitted by law and subject to the same standards as described in the residential zone it is permitted.

The City's current Zoning will be updated to clearly define Residential Care Facilities to provide greater consistency with the definitions described in State Law. The City will also amend the Rialto Municipal Code to permit residential care facilities serving six (6) or fewer persons in all residential zones and treating these smaller facilities no differently than other by-right single-family housing uses. The amendment will also include permitting residential care facilities serving seven (7) or more persons in all residential zones and treating these larger facilities no differently than similar uses. The City will also provide information online and at City Hall on reasonable accommodation with respect to zoning, permit processing, or building laws.

Objectives:

- Amend the Rialto Municipal Code to update Residential Care Facilities zoning and requirements in compliance with State Law.

Timeframe: Within 12 months of the adoption of the Housing Element
Responsible Agency: Planning Division
Funding Sources: General Fund

C. Summary of Quantified Objectives

Table 4-2 summarizes the City's quantified objectives for the 2021-2029 planning period by income group.

Table 4-2: Summary of 2021-2029 Housing Element Quantified Objectives

	Income Level					TOTAL
	Extremely Low*	Very Low	Low	Moderate	Above Moderate	
RHNA Allocation	1,109	1,109	1,206	1,371	3,477	**8,272**
Conservation/Rehabilitation	82			81	0	**163**
Preservation	257			0	0	**257**
Existing Specific Plans (See Table B)	0			1,026	6,512	**7,538**
Pipeline Projects	0			0	916	**916**
Accessory Dwelling Unit Production	40			26	6	**72**
Proposed Rezones	4,723			428	3,436	**8,587**

*Extremely low-income 50% of very low-income RHNA

Appendix A

REVIEW OF PAST PERFORMANCE

Review of Past Performance

The following chart is a review of the City of Rialto's housing project and program performance in the 2014-2021 Planning Period. It is an evaluation of the Mid-Cycle and 5th Cycle Policy Programs and considers the City's progress towards completing all programs outlined within the Mid-Cycle Housing Element.

Program Evaluation

The City had demonstrated a significant effort working towards accomplishing many of the objectives set for the programs of the past cycle. During the fifth cycle, the City completed identified appropriate zones to accommodate emergency shelters and adopted Reasonable Accommodation Procedures. The City made substantial progress towards 16 of the programs and has identified those programs as ongoing for the sixth cycle.

As part of analyzing prior programs, the element must provide an explanation of the effectiveness of goals, policies, and related action in meeting the housing needs of special needs populations. The table on the following pages provides an overview of the City's prior program accomplishments. Achievements related to special needs populations are summarized below.

- **Seniors:** Affordable housing options as well as rehabilitation and physical improvements are important to ensure that housing is accessible to older populations. The City administers a Funding for Housing Rehabilitation Program (Program 5.1B), which provides funding opportunities for the Senior Minor Repair program and housing rehabilitation. The City committed to apply to up to two additional funding sources that contribute to housing rehabilitation. The City also administers an Acquisition, Rehabilitation, and Rental Program (Program 5.3B), which resulted in the assistance of 32 units. Securing funding for and administering rehabilitation programs, however, has been increasingly challenging.

  Additionally, many seniors are on restricted incomes and in need of affordable housing options. The Housing Authority of the County of San Bernardino administers the County Housing Choice Voucher Program (Program 5.3G), which provided the residents of Rialto with 1,553 total project- and tenant-based vouchers between 2016 and 2018. In addition, the Mobile Home Park Preservation Program (Program 5.3D), resulted in the continued implementation of the City's mobile home rent control ordinance which preserved a valuable source of affordable housing in Rialto. While the units preserved and made accessible through these programs are not age-restricted, they do help to increase the supply of affordable housing that is potentially available to seniors who meet income requirements.

- **Persons with Disabilities:** Persons with disabilities also benefit from housing rehabilitation. The Housing for Persons with Developmental Disabilities Program (Program 5.2H) sought funding to support the housing construction and rehabilitation targeted for persons with developmental disabilities as well as contacted and offered developers of supportive housing with regulatory incentives such as expedited permitting, fee waivers, and deferral to targeted projects. In addition, the County Housing Choice Voucher Program (Program 5.3G) also supports the needs of persons with disabilities. The City also adopted reasonable accommodation procedures (Program 5.5B) to promote the improvement and development of housing for persons with disabilities.

- **Large Households:** Homes consisting of five or more members residing together typically lack adequately sized and affordable housing options. As previously discussed in Section 2: Community Profile, overcrowding is a challenge for the residents of Rialto. Program 5.2A, Provision of Adequate Site to Accommodate the RHNA, resulted in the adoption of the Renaissance Specific Plan which includes the projected development of 1,667 residential units. Additionally, the City implemented a Second Unit Ordinance and Programs to Encourage Accessory Dwelling Units (Program 5.2E), which promotes the production of affordable housing by reducing costs and providing incentives. Both programs work to increase the housing supply and diversity of housing options to accommodate the needs for large households.

- **Farm workers:** As previously discussed, farmworkers are not a significant portion of the Rialto community. The City updated their zoning code per the Farmworker Housing Program (Program 5.2O), which permits employee housing in the same manner as a single-family structure, as well as permits higher density employee housing in the same manner as other agricultural uses in the same zone. Additionally, farmworker needs can be accommodated through housing programs and policies that assist lower-income households in general, such as the City's Second Unit Ordinance and Programs to Encourage Accessory Dwelling Units (Program 5.2E), which promotes the production of affordable housing by reducing costs and providing incentives. The Single-Room Occupancy (SRO) Program (Program 5.2K) also promotes the production of affordable housing by updating the City's zoning code to permit SRO units as well as streamline the permitting procedure and providing decimal assistance to SRO developers. These general programs help increase the supply of affordable housing that is potentially available to farmworkers.

- **Single-Parent Households:** As discussed in Section 2: Community Profile, many single parent households, especially female-headed households, live in poverty due to low incomes and higher family expenses. The County Housing Choice Voucher Program (Program 5.3G) provides an important resource for these and other lower income households, including single-parent

households. Additionally, the Tenant-Based Rental Assistance Program (Program 5.3H) provided financial assistance and supportive services to assist families getting into housing and avoiding displacement.

- **Homeless:** A lack of affordable housing for low- and moderate-income increases the number of persons whose income fall below the poverty level and may be housing insecure. The Emergency Shelters Program (Program 5.2F) and Transitional and Supportive Housing Program (Program 5.2G) promote the development of emergency shelters and transitional and supportive housing by permitting them by right and prioritizing funding and incentives to projects that provide housing for the homeless and extremely low-income residents. Additionally, the Single Room Occupancy Program (Program 5.2K) and the Second Unit Ordinance and Programs to Encourage Accessory Dwelling Units (Program 5.2E) have helped address housing insecurity by serving as an entry point into the housing market. Financial assistance and rental subsidies through the County Housing Choice Voucher Program (Program 5.3G) and the Tenant-Based Rental Assistance Program (Program 5.3H) help address housing insecurity, as well.

- **Extremely low-income Households:** As discussed in Section 2: Community Profile, extremely low-income households experience substantial cost burdens due to low incomes and lack of affordable housing. The Single Room Occupancy Program (Program 5.2K) and the Second Unit Ordinance and Programs to Encourage Accessory Dwelling Units (Program 5.2E) have helped increasing the stock of affordable housing. In addition, financial assistance and rental subsidies through the County Housing Choice Voucher Program (Program 5.3G) and the Tenant-Based Rental Assistance Program (Program 5.3H) lessen the cost burden experienced by Extremely low-income households.

Program	Objective	Program Accomplishments	Status for 6th Cycle
Goal 5-1: Maintain and improve the quality of existing housing and neighborhoods in Rialto.			
Program 5.1A Acquisition, Rehabilitation, and Resale Program	Rialto will continue to acquire, maintain, and rehabilitate foreclosed homes in the community through the City's Acquisition, Rehabilitation, and Resale (ARR) Program. The City will continue to implement the ARR program and is currently using grant funds acquired through the Department of Housing and Urban Development's Neighborhood Stabilization Program (NSP). The City will continue to	In FY 2014-2015, three homes were assisted under both NSP 1 and NSP 3. As of December 31, 2015, the City acquired a total of 63 properties, which have been rehabilitated and resold to low- and moderate-income households. In 2016-2018 the City has put this program on	**Ongoing:** The City of Rialto will continue to acquire, maintain, and rehabilitate foreclosed homes in the community when feasible.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	provide information on the ARR Program on the City's website, at City Hall, and in other public places to increase awareness and solicit applications for the program. The City anticipates assisting approximately 100 homes during the planning period.	hold due to the low foreclosure activity. In 2019-2020 Rialto Housing Authority acquired 1.25 acres of land (APN: 0131-021-40) in 2015 to facilitate the development of a 55-unit very-low income multi-family TOD development.	
Program 5.1B Funding for Housing Rehabilitation Programs	Rialto is committed to providing opportunities for the rehabilitation of housing within the City through various programs. Several of the City's rehabilitation programs for both owner-occupied and rental housing relied on Redevelopment Agency Housing Set-Aside funds, including the following: • Home Sweet Home Program • Minor Rehabilitation Program • Senior Minor Repair Program • Rental Property Acquisition/Rehabilitation Program • Rental Property Rehabilitation/Refinance Program • Emergency Repair Mobile Home Program Since the dissolution of Redevelopment, Rialto's housing rehabilitation programs are temporarily deferred pending the availability of other funding resources. For the 2014-2021 planning period, the City will annually investigate new funding opportunities, including CalHOME and CDBG funds. When additional funding sources are identified, the City will promote the housing rehabilitation programs on the City's	**Home Sweet Home Program**: • During FY 2018-2020 the City funded 4 additional home repairs. • From 2016-2018, the City provided loans for home improvements and grants to mobile home repairs to qualified homeowners. • During the FY 2014-2015, the City funded 6 home repairs. **Emergency Repair Mobile Home Program**: • In FY 2017-2020 the City funded 7 home repairs through the mobile home repair program. • In FY 2014-2015 the City approved CDBG funds for projects commencing in FY 2015-2016.	**Ongoing:** The City will continue to annually investigate funding opportunities. When additional funding sources are identified, the City will promote the housing rehabilitation programs to increase awareness and solicit applications.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	website, at City Hall, and in other public places to increase awareness and solicit applications. During the remainder of the 5th Cycle planning period, the City will investigate new funding opportunities offered by federal, state, local and private entities to support housing rehabilitation activities. The city is committed to investigate and/or apply to up to two additional funding sources that can contribute to housing rehabilitation.		
Program 5.1C Code Enforcement	Rialto will continue to implement a proactive code enforcement program through the Code Enforcement Division. Code Enforcement will work closely with the Development Services Department to implement the City's housing programs to preserve and improve Rialto's neighborhoods. The Division will also continue to engage in emergency nuisance abatements actions against vacant and abandoned buildings to ensure that these buildings do not become havens for vagrants or gangs. The City will continue to provide information on the City's zoning and building requirements and any available housing rehabilitation programs on the City's website and at City Hall.	The City continues to utilize Code Enforcement, Housing, and Building staff to focus on deteriorated neighborhoods. Code Enforcement focuses on helping businesses, residents, and property owners comply with State and local codes through abating property maintenance and nuisance issues. On an annual basis, the City issues approximately 1,500-2,100 notices of code violations.	**Ongoing:** The City will continue to utilize Code Enforcement, Housing and Building Division staff to focus on deteriorated neighborhoods.
Program 5.1D Multi-Family Improvement Districts	Rialto will expand the Multi-Family Improvement District Program to other neighborhoods. This program is multi-action oriented and may include implementing an acquisition, rehabilitation and affordable rental program and creation of an assessment district by the owners of at least two thirds of the properties in a	Due to the passage of AB1X26 and AB1X27 by the State of California, which allowed redevelopment dissolution, implementation of this program has been impeded/ delayed.	**Modify:** The City acknowledges the importance of Multi-Family Improvement Districts. The City will continue to investigate new funding opportunities. The

Program	Objective	Program Accomplishments	Status for 6th Cycle
	neighborhood. Since the dissolution of Redevelopment, expansion of this program has been temporarily deferred pending the availability of other funding sources. For the 2014-2021 planning period, the City will annually investigate new funding opportunities. When additional funding sources are identified, the City will evaluate the application of this program to other neighborhoods in Rialto. The City will commit to apply to at least one applicable funding source prior to the end of the 2014-2021 planning period.		City will continue to evaluate the application this program to other neighborhoods in Rialto when funding sources are identified.
Program 5.1E Citywide Homeowner Association Survey	The strength of the homeowners' association is one of the critical factors contributing to the long-term success of a common-interest development. Factors common to effective HOAs are: • An active Board of Directors, elected by the residents • An approved set of CCRs and a willingness to enforce them • Strong on-site property management • Good potential tenant screening • Adequate budgeting and reserves to address ongoing expenses and deferred maintenance Larger multi-family properties which do not have these factors in place are likely to experience continuing problems, eventually leading to problem tenants,	Due to lack of funding and staff availability, the City was not able to implement this program during the planning period.	**Modify:** The City will seek resources and partnerships to conduct citywide surveys of homeowners' associations and investigate/evaluate regulatory and incentive-based options to encourage strong homeowners' associations.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	deteriorating appearance, and diminishing property values. These troubled properties eventually contribute to the decline of the surrounding neighborhood. The City will conduct a citywide survey of homeowner associations to identify and analyze their strength and health. In addition, the City will evaluate the options for enforcement legislation or incentive policies that would encourage strong homeowners' associations.		
Program 5.1F Targeted Neighborhood Approach	The major source of housing problems and other societal neighborhood problems in the City of Rialto is distressed, poorly managed multi-family properties. In addition, the surrounding neighborhoods where these properties are located need attention as well. To systematically address these problem neighborhoods, the City will adopt a Targeted Neighborhood approach, focusing a variety of resources on specific neighborhoods in a concentrated and comprehensive fashion. Under the Targeted Neighborhood Approach, the City will first identify and prioritize its problem neighborhoods; determine which resources would be most appropriate for the targeted neighborhood; and apply resources to the targeted neighborhood until the desired measurements are achieved.	Due to lack of funding and staff availability, the City was not able to implement this program during the planning period.	**Modify:** The City of Rialto will seek resources to monitor sites appropriate to accommodate transitional and supportive housing, as well as seek opportunities for private/public partnerships to meet the needs of persons experiencing homelessness and extremely low-income residents. The City will continue to prioritize funding for projects that provide housing for those experiencing homelessness and those earning an extremely low-income.
Program 5.1G Receivership	To assist property owners with addressing problems with blighted properties, the City implements receivership. In cases where the owner cannot be contacted, or refuses to cooperate, however, the City	The City implemented receivership as needed and considers it a key remedy to correct serious building code violations. In FY 2012-2013,	**Modify:** The City considers receivership a key remedy to correct serious building code violations and will continue to

Program	Objective	Program Accomplishments	Status for 6th Cycle
	has proactively sought the appointment of a receiver to oversee the repair and maintenance of the property, and to ensure that the property is occupied or purchased by an owner who will maintain the property.	receivership was used for one housing unit. No receiverships were used following 2013.	seek funding and partnerships for this program.
Program 5.1H Crime Free Multi-Housing	To address concerns of crimes against property and persons in multi-family housing developments which historically have had such problems, the City developed a Crime Free Multi-Housing Program. This program may include such measures as a certification process for property owners and management companies that partner with the Police Department and receive specialized training to keep their multi-family housing crime free. The incentives to participate may include police-issued signs for the property, certificates of participation, and advertising privileges that would allow participating multi-family housing properties to be promoted in the media as a "crime-free" property. Another component could be a Crime Free Lease Addendum, which would be added to rental agreements and would list specific criminal acts that, if committed on the property, will result in the immediate termination of the resident's lease. This program will ensure that residents are not unfairly penalized for reporting crimes and lease addendums have provisions that do not directly or indirectly penalize resident for reporting crimes. The City will identify at least one funding source and provide a Crime Free Multi Housing Framework Plan that details the eligibility provisions for the programs and a list of	The City had one year of funding available for this project, however it was not implemented.	**Discontinued**: The U.S. Department of Housing and Urban Development has determined Crime Free Multi-Housing programs to be in violation of Title VI of the Civil Rights Act of 1964. The City will discontinue this program for the 6th Planning Cycle Housing Element.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	approved measures that can be employed at any multifamily housing development The City will investigate potential funding sources to implement this program within the 2014-2021 planning period.		
Goal 5-2: Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.			
Program 5.2A Provide Adequate Sites to Accommodate the RHNA	To facilitate development of affordable housing to accommodate the 2014-2021 RHNA as identified in Table 4-1 of Chapter 4 of this Housing Element, the City has identified approximately 135 acres of vacant residential land within the City. Additional growth potential in Specific Plan areas and various infill parcels provide sufficient opportunity to accommodate estimated growth need on currently zoned sites. The identified land inventory (Table B-17) allows a range of residential densities ranging from 2–30 dwelling units per acre. To demonstrate adequate sites, the City has provided an analysis of recent development within the City and realistic development capacity of identified sites as detailed in Chapter 4 of this Housing Element. To ensure sufficient residential capacity to accommodate the identified regional need for lower income households is maintained; the City will develop and implement a formal monitoring program. The program will track development (residential, commercial, and mixed-use) approvals in the identified Housing Element land inventory sites. The City will report on the progress of development in its annual	The Renaissance Specific Plan was adopted in 2010. The Plan is a proposed master plan project located on and around the site of the Rialto Municipal Airport and encompasses 1,445 acres of land. The Plan proposes a total of approximately 1.2 million square feet of business and commercial uses, 1,667 residential units, one school, one community park, and multiple neighborhood parks. The City's Zoning Code has been updated to be consistent with the most recent General Plan update.	**Modify**: Following the successful implementation of this program during the 5th Cycle, the City will monitor availability of existing identified sites and will publicize the housing opportunity sites inventory on the City's website and at City Hall.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	progress reports required pursuant to Government Code Section 65400 and due on April 1st of each year. The inventory of available sites will also be made available to the development community through various outreach methods. The City acknowledges it is subject to the no net loss requirements of SB 166, mandating that "at all times" the Housing Element land inventory and site identification programs must make sufficient sites available to accommodate the city's remaining RHNA need for each income category. SB 166 requires the City of Rialto to ensure the maintaining of available, sufficient sites at appropriate densities to accommodate the RHNA needs for lower income housing. If at any time these sites are not available in the inventory or developed at densities less than identified in the sites inventory, the City will take remedial action within the time period required by State law by identifying and if necessary rezoning, alternative sites to replace the ones not developed at the affordability or the densities projected in the site inventory.		
Program 5.2B Non-Vacant Adequate Sites to Satisfy By-Right Requirements of AB 1397	State law requires that any non-vacant sites identified in a prior housing element must be zoned at 30 units per acre and allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households, if they are to be considered adequate for lower income housing.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue to meet the requirements of AB 1397.

Program	Objective	Program Accomplishments	Status for 6th Cycle
Program 5.2C Lot Consolidation	The City will encourage and facilitate the consolidation of vacant and underutilized lots for residential development through a variety of incentives, including, but not limited to: technical assistance to property owners and developers in support of lot consolidation, identifying opportunities for potential consolidation and offering development incentives such as reduction in setbacks, parking requirements, and other standards. Consolidation will provide the opportunity to develop vacant and underutilized lots to their fullest potential. The City will evaluate the appropriateness of a variety of incentives and provide this information to the developers and other interested parties through the City's website and print material at City Hall.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue to encourage and promote the development of residential units through lot consolidation.
Program 5.2D Pursue Annexation of County Islands	To provide for the orderly and efficient expansion of Rialto and to provide additional opportunities for housing the city with pursue annexation of the remaining county island within Rialto. As a condition of annexation of the remaining two components of the Lytle Creek Specific Plan area, five of the nine unincorporated county are to be annexed. The Local Agency Formation Commission (LAFCO) annexed Neighborhoods 2 and 3 of the Lytle Creek Specific Plan from the unincorporated area of the County of San Bernardino to the City of Rialto pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Section 56000 et seq. of the Government Code. Annexation proceedings for the reorganization of Neighborhoods 2 and 3 (LAFCO	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Discontinued**: The City has decided to discontinue this program for the 6th Cycle Planning Period.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	3201/Rialto Annexation No. 170) became effective on July 25, 2016. As requested by LAFCO, the five north Rialto unincorporated islands are to be annexed prior the approval of the 2 remaining Lytle Creek Specific Plan areas.		
Program 5.2E Second Unit Ordinance and Programs to Encourage Accessory Dwelling Units (ADUs) Affordable to Lower Income and Moderate Income Households	Rialto recognizes that second units are a crucial mechanism for home owners to create additional housing options in the City. To encourage and promote the continued development of new second units, the City will continue to implement the Second Unit Ordinance, and provide information on second unit development application, regulations, and standards on the City's website and at City Hall. Accessory Dwelling Units (ADUs) provide the opportunity to accommodate additional housing opportunities for very-low, low and moderate-income households. The City has worked to reduce the cost of ADUs by compliance with recent statutory requirements. The City will develop and implement appropriate programs and procedures to incentivize the development of ADUs affordable to lower income households. The development of regulatory provisions and/or incentives will be based upon review and evaluation of current programs and policies, survey of programs from other agencies to determine the most feasible and effective alternatives.	The City successfully permitted 7 ADUs in 2019, 14 ADUs in 2020, and 10 ADUs in 2021.	**Discontinued**: The City is discontinuing this program as a number of new ADU programs have been included as part of Section 4: Housing Plan to promote, facilitate, and monitor the development of ADUs throughout the 6th Planning Cycle.

Program	Objective	Program Accomplishments	Status for 6th Cycle
Program 5.2F Emergency Shelters	In compliance with Senate Bill 2, the City of Rialto will amend the Zoning Code to permit emergency shelters by-right within the Industrial Park (I-P) zoning district. This area will be selected due to the availability of multiple vacant parcels and the conversion of existing commercial and industrial development for the development of new emergency shelters. The City will continue to monitor the inventory of sites appropriate to accommodate emergency shelters and will work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. The City is committed to prioritizing funding and other available incentives for projects that provide housing for homeless and extremely low-income residents whenever possible.	The City adopted an Ordinance in 2020 in compliance with Senate Bill 2.	**Modify**: The City will continue to monitor and assist in the development of emergency shelters. The program is being modified to include Municipal Code amendments in compliance with State Law.
Program 5.2G Transitional and Supportive Housing	In compliance with Senate Bill 2 and SB 745 the City of Rialto will ensure the Zoning Code is amended to encourage and facilitates emergency shelters and limits the denial of emergency shelters and transitional and supportive housing under the Housing Accountability Act. This Program will permit transitional and supportive housing by-right in all zones allowing residential uses and mixed use zones allowing residential, subject only to those regulations that apply to other residential uses of the same type in the same zone. In addition, the Zoning Code will be amended to define "supportive housing", "target population" and "transitional housing" pursuant to state law. The City will continue to monitor the inventory of sites	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue to meet the requirements of SB 2 and SB 745.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	appropriate to accommodate transitional and supportive housing and will work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. The City is committed to prioritizing funding and other available incentives for projects that provide housing for homeless and extremely low-income residents whenever possible. New State law provisions have recently been modified to require approval 'by right' of supportive housing with up to 50 units and low barrier navigation centers that meet the requirements of state law. If the City receives applications for these uses, it will process them as required by State law.		
Program 5.2H Housing for Persons with Developmental Disabilities	The housing needs of persons with developmental disabilities are typically not addressed by Title 24 Regulations, and requires in addition to basic affordability, slight modifications to existing units, and in some instances, a varying range of supportive housing facilities. To accommodate residents with developmental disabilities, the City will seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with developmental disabilities. Rialto will also provide regulatory incentives, such as expedited permit processing, and fee waivers and deferrals, to projects targeted for persons with developmental disabilities. To further facilitate the	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue to explore opportunities and assist persons with developmental disabilities in accessing housing.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	development of units to accommodate persons with developmental disabilities, the City shall reach out annually to developers of supportive housing to encourage development of projects targeted for special needs groups. The city will partner with the Inland Regional Center to provide better access to residents through outreach and other appropriate communication tools to services that are currently available. As housing is developed or identified, Rialto will work with the Inland Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities. The City will provide information at City Hall and on the City's website.		
Program 5.2l Manufactured Housing	State law (Government Code Section 65852.3) requires that the city's zoning code allows and permits manufactured housing in the same manner and in the same zone as a conventional structures are permitted. Specifically, manufactured homes should only be subject to the same development standards that a conventional single-family residential dwelling on the same lot would be subject to. To comply with State law, the City will amend the Rialto Zoning Code to define manufactured housing and mobile homes consistent with State law and identify the zone(s) where such housing is permitted. The City will also ensure that the requirements for manufactured homes is the same as a conventional single-family dwelling unit in the same zone.	The City adopted an Ordinance in 2020 in compliance with Government Code Section 65823.3 which specifies that local governments cannot exclude permanently sited manufactured homes from lots zoned for single-family dwellings (unless manufactured housing is more than 10 years old) but may require certain design/architectural requirements. The amendments define manufactured housing and mobile homes consistent with State law and identify the zone(s) where	**Ongoing:** The City will ensure all development standards, procedures and design criteria meet the objectives of Government Code Section 65823.3.

Program	Objective	Program Accomplishments	Status for 6th Cycle
		such housing is permitted. Additionally, the Ordinance requires standards for manufactured homes are the same as a conventional single-family dwelling unit in the same zone.	
Program 5.2J Condominium Conversion	Rialto recognizes the importance of preserving the City's affordable rental housing stock and discouraging conversions that could decrease the number of existing affordable units. The City will research and consider the applicability of a citywide Condominium Conversion Ordinance. The research will review the following topics: how to minimize the potential displacement of current tenants, replacement requirements for affordable rental units, and ways to alleviate the potential negative effects of condominium conversion on the rental housing stock.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue to preserve the City's affordable rental housing stock by seeking ways to discourage conversions that could decrease the number of existing affordable units.
Program 5.2K Single-Room Occupancy (SRO)	Rialto recognizes that single-room occupancy units may provide a valuable source of affordable housing for individuals and can serve as an entry point into the housing market for people who previously experienced homelessness. The City will adopt provisions in its Zoning Code to identify zone(s) to permit single-room occupancy units and consider additional requirements for this type of housing, including parking, on-site amenities, and management and safety plans. The City will consider more streamlined permitting procedures, technical assistance for potential SRO developers, and	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Modify:** The City will revise the Zoning Code to permit single-room occupancy units (SROs) and additional development regulations and requirements within one-year of Housing Element adoption.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	outreach to property owners of existing SRO developments.		
Program 5.2L Alternative Housing Concepts	To provide more potential housing opportunities in Rialto, the City will review and research alternative housing concepts such as live-work developments, small lot developments, two master-bedroom housing units, and co-op housing. The City will review the applicability of these housing types in Rialto and review and revise the Zoning Code, as appropriate, to encourage development.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue to seek alternative housing concepts to provide a variety of housing types for the community.
Program 5.2M Residential Care Facilities	State Law defines residential care facilities as any family home, group care facility or similar facility for 24-hour non-medical care of persons in need of personal services supervision or assistance essential for sustaining activities of daily living for the protection of the individual. Such uses are permitted by law and subject to the same standards as described in the residential zone it is permitted. The City's current Zoning will be updated to clearly define Residential Care Facilities to provide greater consistency with the definitions described in State Law and provide clarity.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Modify:** The City will update its Zoning Code to permit Residential Care Facilities in accordance with State Law.
Program 5.2N Replacement Housing	The City may have existing non-vacant sites included within the inventory of sites that may contain vacant or demolished residential units that were occupied by lower income households or households subject to affordability requirements within the last five years. The City will adopt a formal replacement housing program to ensure the replacement of any units lost for	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will adopt a formal replacement housing program to ensure the replacement of any units lost in compliance with Government Code section 65915.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	housing units shall comply with the same requirements pursuant to Government Code section 65915.		
Program 5.2O Farmworker Housing	The City of Rialto shall amend Zoning Code Section 18.08.020 to permit employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwelling units as permitted in the same zone. Additionally, employee housing consisting of no more than 12 units or 36 bed shall be permitted in the same manner as other agricultural uses in the same zone.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Modify:** The City will amend the Municipal Code to state that employee housing consisting of no more than 12 units or 36 beds will be permitted in the same manner as other agricultural uses in the same zone, and explicitly define Farmworker Housing and establish it as permitted use in residential or nonresidential zones, consistent with State law.
Program 5.2P SB 35 Compliance	The City of Rialto shall amend, as appropriate, policies, programs and procedures in the Zoning Code and other applicable portions of the Municipal Code to comply with the requirements of SB 35. These provisions shall apply when the City is not meeting the requirements Regional Housing Needs Assessments (RHNA).	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Modify:** The City will continue to meet the requirements set forth by SB 35.
Program 5.2Q Subdivision of Specific Plan Areas	The City will work with applicants to facilitate the efficient subdivision of parcels greater than half an acre and less than 10 acres within the private Specific Plan Areas identified in the Housing Element. This program assists in creating developable parcels to accommodate the lower income RHNA need pursuant to the City's RHNA obligation.	This program was included as part of the 5th Cycle Mid-Year Update adopted by the City in 2019, and as such there are not yet accomplishments to report on.	**Ongoing:** The City will continue facilitating development as established in each adopted Specific Plan.

Program	Objective	Program Accomplishments	Status for 6th Cycle
Goal 5-3: Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.			
Program 5.3A Mortgage Assistance Program	The City will continue to assist homebuyers through the Mortgage Assistance Program (a deferred loan program provided as down-payment assistance). Applicants are required to be first time homebuyers and must meet County HUD income limits. The City will continue to provide information on the Mortgage Assistance Program on the City's website and at City Hall. The City anticipates assisting 100 new homeowners during the 2014-2021 planning period, depending on ongoing funding availability.	Approximately 100 homes under the NSP 1 grant and approximately 200 homes under the NSP 2 grant. In FY 2013-2014, the City assisted four homes under NSP 1 and NSP 3. As of December 31, 2015, the City has used NSP funds to assist 60 low- and moderate-income homebuyers purchase foreclosed housing units during the life of the program.	**Ongoing:** The City will continue to seek funds to continue this program in the planning period. This program is continuing through working with the Neighborhood Partnership Housing Services, Inc.
Program 5.3B Acquisition, Rehabilitation, and Rental Program	The City will continue to implement the Acquisition, Rehabilitation, and Rental (ARRental) Program designed to acquire, maintain, and rent foreclosed multi-family units to very low-income households. The units will be acquired by either the City or by for-profit or non-profit companies under the agreement of the City. Once complete, the units will be owned and managed by the company and must remain affordable for very low-income households for 55 years. The City will continue to provide information on the ARRental Program on the City's website and at City Hall. The City anticipates assisting 50 units during the 2014-2021 planning period, depending on grant funding availability.	Approximately 8 units under the NSP 1 grant and approximately 16 units under the NSP 2 grant. In 2014, eight units were approved for assistance under NSP 3.	**Ongoing:** The City will continue to seek funds to continue this program in the planning period.
Program 5.3C Preserve and Monitor At-Risk Units	The City works with individual property owners to encourage the maintenance of affordability of assisted units. There are 140 assisted multi-family units at-risk of converting to market rate during the ten years	The City continues to monitor at-risk projects through its Annual Progress Report.	**Ongoing:** The City will continue to seek funding opportunities and monitor at-risk projects.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	following the beginning of the planning period (2014-2024). The City is committed to preserving its stock of affordable housing and will provide technical assistance, seek additional nonprofit and for-profit partners, and facilitate financial assistance for affordable housing units at-risk of conversion. The City will continue to work with property owners to develop a strategy to maintain affordability controls on assisted units. The City will also inventory and gather information to establish an early warning system for publicly assisted housing units that have the potential to convert to market rate. This will include an annual review of the conversion status of all subsidized housing in the City. The City will develop and maintain an AB 987 database to include detailed information on all subsidized units, including those that have affordability covenants. The database will indicate the expiration date of any covenant and any requirements governing reimbursement. When available, the City will utilize resources such as HUD Section 208/811 loans, HOPE II and III Homeownership program funds, HOME funds, CDBG funds, Low-Income Housing Tax Credit Programs, California Housing Finance Agency single-family and multi-family programs, programs to stimulate private developer and nonprofit entity efforts in the		

Program	Objective	Program Accomplishments	Status for 6th Cycle
	development and financing of housing for lower and moderate-income households. The City will continue to monitor at-risk developments throughout the planning period and pursue partnership opportunities with nonprofits to preserve and expand affordable housing in the City.		
Program 5.3D Mobile Home Park Preservation	Mobile home parks provide a valuable source of affordable ownership housing in Rialto. To encourage the preservation of mobile home parks, the City will continue to implement the mobile home rent control ordinance and convene the Mobile Home Rent Review Commission. The City will continue to provide information on the mobile home rent control ordinance at City Hall and work with mobile home park owners and tenants to resolve any issues.	The City continues to utilize the Mobile Home Rent Review Commission and the related mobile home rent ordinance to facilitate and encourage fair bargaining between mobile homeowners and park owners in order to achieve mutually satisfactory agreement regarding space rental rates in mobile home parks	**Ongoing:** The City will continue to prioritize the preservation of mobile home parks.
Program 5.3E County Homeownership Program	To encourage low- and moderate-income homeownership, Rialto will continue to provide information on the City's website and at City Hall on the County of San Bernardino's Homeownership Assistance Program (HAP). The program assists low- and moderate-income homebuyers to meet the cash requirements of a home purchase. The HAP funds may be used for gap financing, down payment, or closing cost assistance. The assistance is in the form of a deferred loan and is secured by a second trust deed.	The Housing Authority of San Bernardino continues to implement the Homeownership Assistance Program (HAP), which assists participants with finding an appropriate mortgage lender and work with the participant through the process of buying a home.	**Ongoing:** The City will continue to advertise and provide information about the County of San Bernardino's Homeownership Assistance Program online and at City Hall.
Program 5.3F Good Neighbor Next Door Program	To support homeownership among local police officers, fire personal, and teachers, Rialto will continue to participate in and provide information on the	HUD's Officer/Teacher Next Door Program (now known as the HUD Good Neighbor Next Door	**Ongoing:** The City will continue to advertise and provide information about

Program	Objective	Program Accomplishments	Status for 6th Cycle
	Department of Housing and Urban Development's (HUD) Good Neighbor Next Door Program at City Hall. Through the federal program, applicants can purchase homes from a selected list of HUD homes, which are available at a 50 percent discount off the listed price. The City continue to provide information on the Good Neighbor Next Door Program at City Hall.	Program), assists law enforcement officers, pre-Kindergarten through 12th grade teachers, firefighters and emergency medical technicians become homeowners. It offers a substantial incentive in the form of a discount of 50% from the list price of the home.	the programs to Rialto residents online and at City Hall.
Program 5.3G County Housing Voucher Program	Continue to cooperate with the San Bernardino County Housing Authority to administer the Housing Voucher Program (Section 8). The program provides rent subsidies to very low-income households that spend more than 50 percent of their income on rent. The City will continue to refer residents to the County program and provide information at City Hall, the City's website, and other public places to increase awareness and solicit applications.	The City continues to participate in the Housing Voucher Program administered by the San Bernardino Housing Authority. The Housing Choice Voucher (HCV) Program (commonly referred to as Section 8) manages vouchers to low income families and individuals. These vouchers give our families the freedom to select decent, safe, and sanitary housing based on their individual needs. From 2016-2018 the County assisted 30,780 homes with vouchers, including 1,552 residents in Rialto through the Section 8 Program	**Ongoing:** The City will continue to advertise and provide information about the programs to Rialto residents online and at City Hall.
Program 5.3H Tenant-Based Rental Assistance	Through the Security Deposit Assistance Program, the County of San Bernardino uses HOME funds to provide financial assistance with required security deposits on rental housing units and tenant paid utilities to persons who can afford monthly rent payments but lack	The City continues to participate in the County tenant-based rental assistance. The program has two components: Eviction Prevention and New Rentals.	**Ongoing:** The City will continue to advertise and provide information about the programs to Rialto

Program	Objective	Program Accomplishments	Status for 6th Cycle
	necessary funds to get into and/or, to avoid being displaced from, decent housing. In addition, the County provides funds to low- and moderate-income renter households through the Monthly Rent Subsidies Program, also funded by the County HOME Program. Rialto will continue to participate in this County program and provide information about the program at City Hall and the City's website.		residents online and at City Hall.
Goal 5-4: Alleviate any potential governmental constraints to housing production and affordability.			
Program 5.4A Density Bonus	Government Code Section 65915 requires that a jurisdiction adopt a local Density Bonus Ordinance consistent with State law. State Density Bonus Law requires a local jurisdiction to grant an increase in density, if requested by a developer, for providing affordable housing as part of a development project. Key provisions of the law include incremental density bonuses that correspond to the percentage of housing set aside as affordable units. State law caps the maximum density bonus at 35 percent and allows the developer to request up to three incentives or concessions, if required to provide the affordable units. The law also provides reduced parking requirements and allows requests for waivers of development standards, such as increased height limits and reduced setback requirements. The developer must provide reasonable documentation demonstrating that incentives reduce costs to provide for affordable units; and that waivers are required because the usual	The City has amended the Zoning Code to include a Density Bonus Program. In addition, the City has approved the Foothill Boulevard Specific Plan, Downtown Vision plan, and the Renaissance Rialto Specific Plan, which all allow density bonus.	**Ongoing:** The City will continue promote the adopted Density Bonus Ordinance online and at City Hall.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	standards physically preclude the project from achieving the allowed density and incentives. Developers in the City have utilized State Density Bonus Law in the construction of affordable housing units. To comply with State Density Bonus law, the City will amend the ordinance as needed to ensure that its local ordinance remains consistent with State law, but will apply current state law even before local amendments are adopted. The City commits to continue to review and approve requests under State Density Bonus Law (including requests for incentives, concessions, waivers, and parking reductions) so that projects that qualify are not prevented from developing at the densities to which they are entitled.		
Program 5.4B Remove Development Constraints	On a regular basis, City staff will review the development standards and design review findings in the Zoning Code to identify standards and requirements that may constrain the development of affordable housing in Rialto. Specifically, staff will review the following: Review multi-family parking standards to determine if the existing standards create a constraint to development. Should the analysis determine the existence of constraints, parking standards for multi-family development will be modified in the city's Zoning Code.	There are no current activities or policies for Removing Development Constraints.	**Ongoing:** The City will continue to evaluate the potential of the program and explore potential funding.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	The City of Rialto is subject to SB 35 streamlining provisions and will be required to permit streamlining for projects with at least 10% affordable units. The City must review permits for qualifying housing developments within a statutory time frame (90 days for ≤ 150 units; 180bdays for ≥ 150 units). Projects cannot go through design review or be subject to public hearings, and in many cases the City cannot require parking. All projects covered under SB 35 are still subject to the zoning and building code. At this time, qualified housing proposals with at least 10% affordable units may be eligible for SB 35 streamlining in Rialto. Should compliance with SB 35 occur in the future, subsequent projects may not be subject to these requirements. Staff will review requirements such as the minimum unit size, including minimum unit size requirements for Accessory Dwelling Units (ADUs) and Single-Room Occupancy units (SROs); setbacks; parking requirements, including parking requirements for studio apartments/units; height restrictions; etc. to ensure that they are necessary and pertinent. The City will also review the existing Precise Plan of Design requirements and process to identify any constraints and the existence of objective standards applied to project applicants on the development of affordable housing in the City.		

Program	Objective	Program Accomplishments	Status for 6th Cycle
	The City will review permit requirements for Multi-family projects in the R-3 zone consisting of five or more units that may have a longer review timeline, as they are subject to approval of a conditional development permit (CDP). The City will evaluate modifications to these standards to ensure they do not pose a constraint on development. Staff will also on a case-by-case basis identify ways that standards can be relaxed if it is determined that such requirements are in any way impeding the development of affordable housing in the City. The City will also continue to provide development standard modifications including inclusion of objective design and development standards streamlined processing for applications related to the creation of affordable housing, and will offer fee modifications for projects proposing affordable units that are required to apply for variations to the existing development standards.		
Program 5.4C Water and Sewer Service Providers	Pursuant to Chapter 727, Statues of 2005 (SB 1087), the City of Rialto is required to deliver its adopted housing element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects, to ensure that the providers have an opportunity to provide input on the Element. Additionally, review of the Housing Element ensures that priority for water and sewer services is granted to projects that include units affordable to lower-income	The City provided its Mid-Cycle and 5th Cycle Housing Element Updates to the local water and sewer service providers.	**Ongoing:** This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects, to ensure that the providers have an opportunity to provide input on the Element. Review of the Housing Element ensures that priority for water and sewer

Program	Objective	Program Accomplishments	Status for 6th Cycle
	households. The City will submit the adopted Housing Element to local water and sewer providers for their review and input.		services is granted to projects that include units affordable to lower-income households. The City will provide the local water and sewer service providers with the 6th Cycle Housing Element Update and all related appendices and documents.
Goal 5-5: Promote equal opportunity for all residents to reside in the housing of their choice.			
Program 5.5A Fair Housing Services and Affirmatively Further Fair Housing	The City will continue to provide fair housing services through the Inland Fair Housing and Mediation Board. The ongoing contract provides Rialto residents with the following fair housing services: shared housing information for senior residents, counseling and information on housing discrimination, tenant/landlord dispute resolution, bilingual housing literature, and testing for housing discrimination. The City will continue to provide informational and educational materials on fair housing services for property owners, apartment managers, and tenants at City Hall and the City's website. The City will also continue to monitor and respond, as appropriate, to complaints of discrimination, and will refer tenants to the Inland Fair Housing and Mediation Board for proper intake investigation and resolution of fair housing complaints. Pursuant to AB 686, The City will affirmatively further fair housing by taking meaningful actions in addition to resisting discrimination, that overcomes patterns of	The City continues to participate with the Inland Fair Housing and Mediation Board (IFHMB) to combat housing discrimination. IFHMB continues to educate both tenants and landlords as to their rights and responsibilities under fair housing laws. IFHMB investigates discrimination complaints and works in partnership with the United States Department of Housing and Urban Development (HUD) and the California State Department of Fair Employment and Housing (DFEH) in fighting discrimination in housing.	**Ongoing:** The City will continue to provide information on Fair Housing and will continue to monitor and respond to complaints of discrimination.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristic, as defined by California law. The City will partner with capable organizations to review housing discrimination complaints, attempt to facilitate equitable resolution of complaints, and, where necessary, refer complainants to the appropriate state or federal agency for further investigation and action. Additionally the city with work with the County to update the Regional Analysis to the Impediments (AI) to Fair Housing Choice in partnership with local agencies. The City will implement the actions contained in the AI and collaborate with the jurisdictions in partnership with the County to complete the AI.		
Program 5.5B Reasonable Accommodation	Pursuant to Government Code Section 65583, the City of Rialto is obligated to remove potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities. The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. Reasonable accommodation provides a basis for residents with disabilities to request flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or	City staff has developed a scope of work and is currently in the process of securing funding to develop this program.	**Ongoing:** The City will continue to promote the adopted Reasonable Accommodation Procedures on the City website and at City Hall.

Program	Objective	Program Accomplishments	Status for 6th Cycle
	requirements from the local government to ensure equal access to housing opportunities. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be "reasonable" based on fair housing laws and case law interpreting the statutes. The City of Rialto encourages and promotes accessible housing for persons with disabilities. In general, City Staff takes into consideration the provisions of the California Americans with Disabilities Act (Cal ADA) in the review and approval of housing projects and grants modifications and deviations from the Municipal Code to accommodate the needs of persons with disabilities. The City will provide information on formal reasonable accommodation procedures at City Hall and on the City's website.		

Appendix B

INVENTORY OF ADEQUATE SITES

Adequate Sites

A. Adequate Sites Analysis Overview

The Housing Element is required to identify potential candidate housing sites by income category to meet the City's RHNA Allocation. The sites identified within the Housing Element represent the City of Rialto's plan for housing at the designated income levels within the 6th housing cycle planning period (2021 – 2029). The identified sites are either residentially zoned or within areas of opportunity identified by the City with supporting strategies to stimulate future housing growth. As described in this appendix, the development capacity of each site depends on permitted density, site-specific factors, and development assumptions identified for each "Opportunity Area."

The appendix contains **Tables B-20** to **B-22**, which identify each candidate housing site within Rialto's sites inventory. The sites are identified by assessor parcel number (APN) as well as a unique identifier used to track sites within the inventory and on relevant maps. Additionally, the following information is provided for each parcel.

- Address
- Ownership
- Zoning (including overlays if applicable)
- Size (net developable acres removing known development constraints)
- Assumed density
- Vacancy status
- Previous housing element identification
- Potential development capacity (dwelling units) by income category
- Description of existing use

Table B-1 shows the City's 2021-2029 RHNA need by income category as well as a summary of the sites identified to meet the need. The analysis within this appendix shows that the City of Rialto has the capacity to meet their 2021-2029 RHNA allocation through a variety of methods, including:

- Identification of development capacity on entitled private specific plans
- Identification of development capacity on sites which permit development of residential uses at or above 30 dwelling units per acre
- Development of approved projects which do not yet have certificates of occupancy
- Future development of Accessory Dwelling Units (ADUs)
- Identification of opportunity areas for rezone to higher-density residential use

Table B-1: Summary of RHNA Status and Sites Inventory					
	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2021-2029)	2,218	1,206	1,371	3,477	8,272
Pipeline Projects	0	0	0	916	916
Units Constructed/ Issued Permits in Projection Period (Begins June 31, 2021)	0	0	0	285	285
Remaining Unmet RHNA	**2,218**	**1,206**	**1,371**	**2,276**	**7,071**
Existing Zoning – Unit Capacity					
Accessory Dwelling Unit Projection	40		26	6	72
Entitled, Private Specific Plans					
Lytle Creek Ranch Specific Plan	0		621	5,638	6,259
Renaissance Specific Plan	0		405	874	1,279
Rezone Strategies – Unit Capacity					
Opportunity Areas with Rezone/Upzone Programs					
1 - Foothill Boulevard Specific Plan	2,443		227	1,767	4,437
2 - North Riverside Avenue	369		40	264	673
3 - Gateway Specific Plan	307		28	223	558
4 - Rialto Central Area Specific Plan	189		8	153	350
5 - Baseline Parcels	88		5	70	163
6 - Baseline Shopping Center	744		70	539	1,353
7 – Housing Opportunity Overlay	583		50	420	1,053
Total Potential Development Capacity	**4,763**		**1,480**	**9,954**	**16,197**
Sites Surplus/Shortfall (%)	39%		8%	186%	96%
Sites Surplus/Shortfall (#)	1,339		109	6,477	7,925

1. Selection of Sites

The City of Rialto has identified sites with capacity to accommodate the 2021-2029 RHNA. The City has identified 64 parcels within Specific Plans - 57 parcels within the Lytle Creek Specific Plan, which is located to the north east of the City and east of North Riverside Avenue, and 7 parcels within the Renaissance Specific Plan, which is located south of Foothill Freeway and between North Ayala Drive and North Alder Avenue. There are also 20 "Projects in the Pipeline" sites (described below), in addition to nine 5th Cycle Housing sites that add to the City's housing stock.

The City has identified another 258 parcels, categorized into seven (7) Opportunity Areas, which are designated for programs to create additional residential capacity through upzones and rezones. A total of 137 of these parcels have existing zoning to allow residential development. The City conducted an analysis to identify the additional 121 non-residentially zoned sites with characteristics indicating potential to redevelop within the planning period.

All identified sites were evaluated based on surrounding and existing on-site development to determine the extent to which on-site uses have the potential to redevelop within the planning period (2021-2029).

2. Projects in the Pipeline

The City has identified several projects currently in, or that have completed the entitlement process. These projects are likely to be developed and/or first occupied during the planning period and count as credit towards the 2021-2029 RHNA allocation. The City has currently identified 6 projects over 20 sites with a planned development of 916 units, all of which will be affordable to above-moderate income households.

3. Specific Plans with Remaining Entitled Capacity

The City has identified a total of 64 parcels within Lytle Creek Specific Plan and Renaissance Specific Plan to accommodate the RHNA need with existing capacity. Both specific plans are entitled for the number of units projected within this appendix. As of August 2021, the City has begun receiving applications to develop residential units in both Specific Plan areas. All unit projections outlined are expected to be constructed during the planning period.

Implementation of Specific Plans

In order for development to begin, the City's Municipal Code states proposed developments must be reviewed by the Community Development Director or Planning Commission, as applicable for the particular use or building, and found to be consistent with the Specific Plan for the area. Criteria for review and approval of proposed developments shall include, but not be limited to the following:

- Conformance with the land use designation;
- Conformance with specific development standards, goals, and policies of the Specific Plan;
- And conformance with the intended density of the zone of the site.

Renaissance Specific Plan

The Renaissance Specific Plan includes a 107-acre residential community with 1,280 entitled residential units between Linden Avenue and Ayala Drive south of the Renaissance Marketplace. The units are assumed to range from moderate to above-moderate income, based on density permitted. **Figure B-1** outlines the area planned for residential development within the Specific Plan. This includes the following breakdown in zoning and maximum units permitted:

- 405 units of low density residential – 50.5 acres
- 363 units of medium density - 29 acres
- 312 units of medium high density - 19.5 acres
- 200 units of high density - 8 acres

The goal of the Specific Plan is to bring together employment opportunities, residential uses, and commercial/retail amenities. Renaissance Marketplace, located to the north of the identified residential area in **Figure B-1**, includes commercial and retail amenities for residents. The Specific Plan has identified the parcels closest to Renaissance Marketplace for the location of medium to high density residential developments to provide for easy and quick access to resources and employment opportunities. Business and employment centers are also located across North Linden Avenue to the west.

The Renaissance Marketplace and most of the business/employment centers are built and completed, but the residential developments are anticipated to continue through the 2021-2029 planning period. The City anticipates housing developments to meet the entitled number of units listed above. In order to expedite investment and development, it is the City's expressed intent to streamline the review of development proposals within the Renaissance Specific Plan. Accordingly, any proposed building that is larger than 500,000 square feet shall be subject to EDC Review.

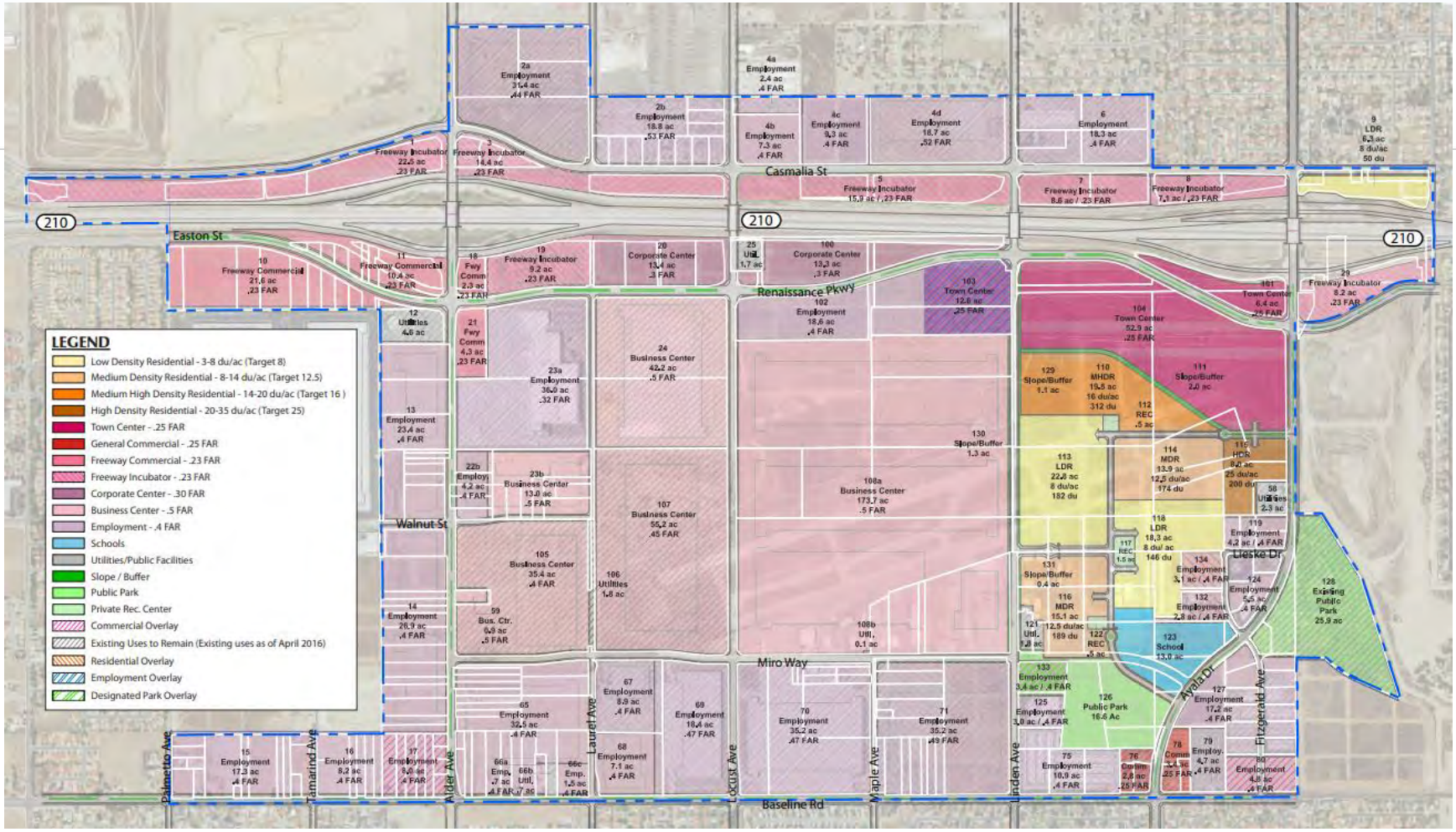
According to the Renaissance Specific Plan, the financing of construction, operation, and maintenance of public improvements and facilities will include funding through a combination of financing mechanisms. However, the developer shall ultimately be responsible for all fair-share costs and/or conditions of approval (including those in excess of fair share costs but with fee credits or reimbursement agreements) associated with implementing the project, including but not limited to the costs of providing infrastructure and complying with all mitigation measures, conditions of approval, and other requirements of the project.

Various financing strategies may be utilized to fund the public facility improvements specified by the Specific Plan. Financing may involve a combination of impact fees and exactions, fee credits, reimbursement agreements, special assessment districts, landscaping and lighting districts, community facilities districts, and other mechanisms as agreed to by the developer and City.

The City and developer will cooperate to ensure that the public facilities are built in accordance with all requirements of the Specific Plan. A Development Agreement and conditions of approval may be used to facilitate this process. The appropriate mechanism for each particular improvement shall be tied to the phasing, established Conditions of Approval and site plan/design review approval. As of February 2021, the City has received one Precise Plan of Design application for 403 units on 39.14 acres.

Figure B-1: Renaissance Specific Plan

Figure B-2: Renaissance Specific Plan – Planning Areas



Lytle Creek Ranch Specific Plan

The Lytle Creek Specific Plan covers approximately 2,447.3 total acres, with about 694.2 acres located in Rialto and 1,753.1 acres currently located in unincorporated San Bernardino County. The area of Lytle Creek Specific Plan located in Rialto allows for a total of 6,260 dwelling units. Two neighborhoods are planned to provide for a variety of housing needs and lifestyles, including a private community for residents over the age of 55. As **Table B-2** outlines, the average density of the neighborhoods is currently 3.44 dwelling units/acre. The affordability range of the units is assumed to be moderate to above moderate income, based on the density permitted. **Table B-3** provides a summary breakdown for housing development by land use designation within Lytle Creek Ranch.

Development of the Lytle Creek Ranch Specific Plan has not begun but it anticipated to take place during the 2021-2029 planning period. Build-out will occur by 2030 and phasing will occur either sequentially or concurrently with one another. The City anticipates the residential developments to reach the entitled maximum of 6,260 units, as outlined in **Table B-2** and **B-3**. As of February 2021, the City has received and approved three Precise Plan of Design applications. The three applications total 364 units on 67.05 acres.

Table B-2: Lytle Creek SP Land Use Summary by Neighborhood in Rialto

Neighborhood	Approximate Acreage	Estimated Average Density	Dwelling Units	Square Footage	Assumptions
II	801.8	-	2,931	102,452	Active Adult
III	968.8	-	3,329	566,279	-
TOTAL	**1,770.6**	**3.44**	**6,260**	**668,731**	**-**

Source: Lytle Creek Ranch Specific Plan (2012)

Table B-3: Lytle Creek SP Land Use Summary by Neighborhood

Land Use Designation	Density Range (DU/AC)	Target Dwelling Units (DU)	Medium Density (DU/AC)	Acres	Percent of Specific Plan
Single-Family Residential 1 (SFR 1)	2-5	467	3.6	132.2	5.4%
Single-Family Residential 2 (SFR 2)	5-8	1,908	6.3	304.5	12.4%
Single-Family Residential 3 (SFR 3)	8-14	1,937	10.9	179	7.3%
Multi-Family Residential (MFR)	14-28	959	17.2	52.3	2.1%
High-Density Residential (HDR)	25-35	989	29.2	33.4	1.4%
TOTAL	**-**	**6,260**	**8.95**	**701.4**	**38.4%**

Source: Lytle Creek Ranch Specific Plan (2012)

The following administrative standards apply to the implementation of future development applications (including plot plans, tract maps, parcel maps, conditional use permits, or variances) for projects within the Specific Plan area:

1. No development shall occur or building permits issued within the adopted Specific Plan area until the proposed development is reviewed by the City's Development Review Committee and found to be consistent with the adopted Specific Plan.
2. Future development within the Specific Plan area shall require individual project review and analysis including General Plan and Specific Plan consistency and environmental analysis, according to the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines.
3. Future tentative or parcel maps and site plan review documents shall be consistent with the Specific Plan.
4. Building permits for dwelling units shall be issued when a final subdivision map has been recorded. Permits may be issued for model units prior to final map recordation subject to the Subdivision Map Act and Development Code.
5. Specific lotting designs and residential dwelling unit types for each planning area shall be determined at the time of individual implementing site design or subdivision proposals. Residential lot sizes, densities, and housing types may vary within each planning area so long as the number of units in the planning area does not exceed that allowed by this Specific Plan.
6. The Rialto Unified School District is the lead agency for all environmental and entitlement processes related to schools within Neighborhood III of Lytle Creek Ranch. Any additional review and approval through the Specific Plan process shall not be required.

Table B-4 outlines the actions required for implementing development applications.

Table B-4: Lytle Creek Ranch Specific Plan - Implementing Development Applications

Proposed Improvements	Transportation Commission	DRC	Director of Development Services	Planning Commission	City Council
Development Transfer Between Planning Areas		X	X		
Specific Plan – Ministerial Changes		X	X		
Specific Plan – Minor Adjustments		X	X	X	
Specific Plan – Major Amendment	X	X	X	X	X
Precise Plan of Design (Design Review)		X	X		
Development Agreement					X
Tentative Map(s) or Parcel Map(s)		X	X	X	

Source: Lytle Creek Ranch Specific Plan

According to the Lytle Creek Ranch Specific Plan, there are several types of financing strategies and tools available for financing master planned communities such as Lytle Creek Ranch. It is anticipated that the project will build-out using a variety of these strategies and tools including, but not limited to, the following:

- The Mello-Roos Act enables cities, counties, special districts, and school districts to establish community facilities districts and to levy special taxes to fund a variety of facilities and services required by a specific plan. A Mello-Roos tax can be applied to the planning and design work directly related to the improvements being financed and may also fund services on a pay-as-you-go basis including police and fire protection, ambulances, flood protection, recreational programs, parks, and schools.
- Special assessment districts, such as those enabled by the Lighting and Landscape Maintenance Act of 1972, the Municipal Improvement Act of 1913, and the Improvement Bond act of 1915, provide methods of leveraged financing whereby a public entity determines an area in which the provision of facilities will benefit real property. One or more special assessment districts may be created for the Lytle Creek Ranch project to cover improvements such as landscaping and lighting. This financing tool can be used for public improvements that directly benefit specific properties that are assessed to pay for the improvements at no risk to public agency general funds.
- Impact fees and exactions are another tool for paying for new development resulting from increased population or demand for services. The master developer for Lytle Creek Ranch will negotiate with the City of Rialto to determine appropriate fees and exactions, which shall be identified in a Development Agreement.
- In certain instances, funding for on-site facilities may be tied directly to the Lytle Creek Ranch project. The developer may pay a fair share portion of the facility in exchange for development rights. On-site local streets, utility connections from the main trunk lines, and drainage facilities are typical examples of facilities that may be funded by the developer. Such improvements will usually be required concurrently with the project development.

Figure B-3: Lytle Creek Ranch Specific Plan

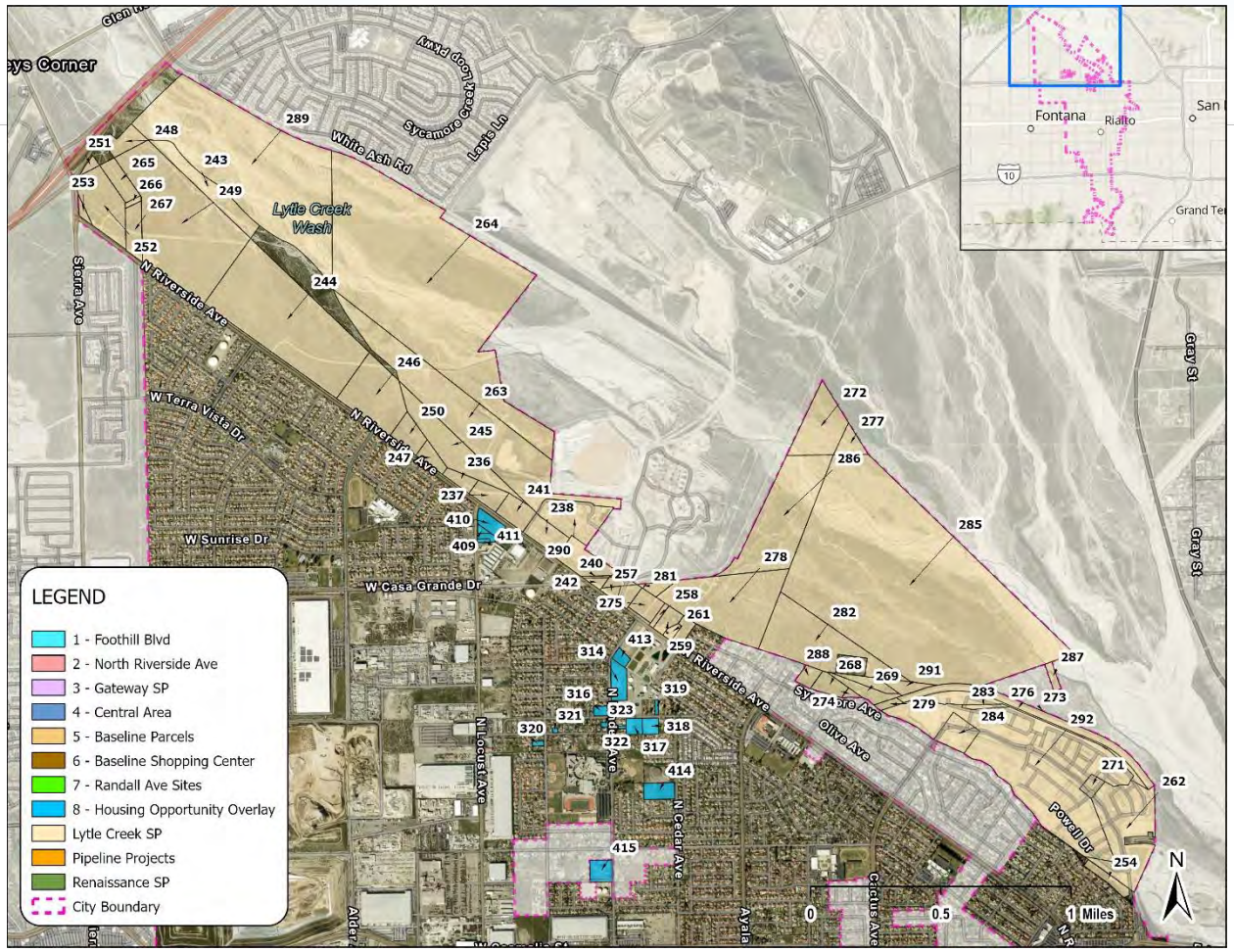
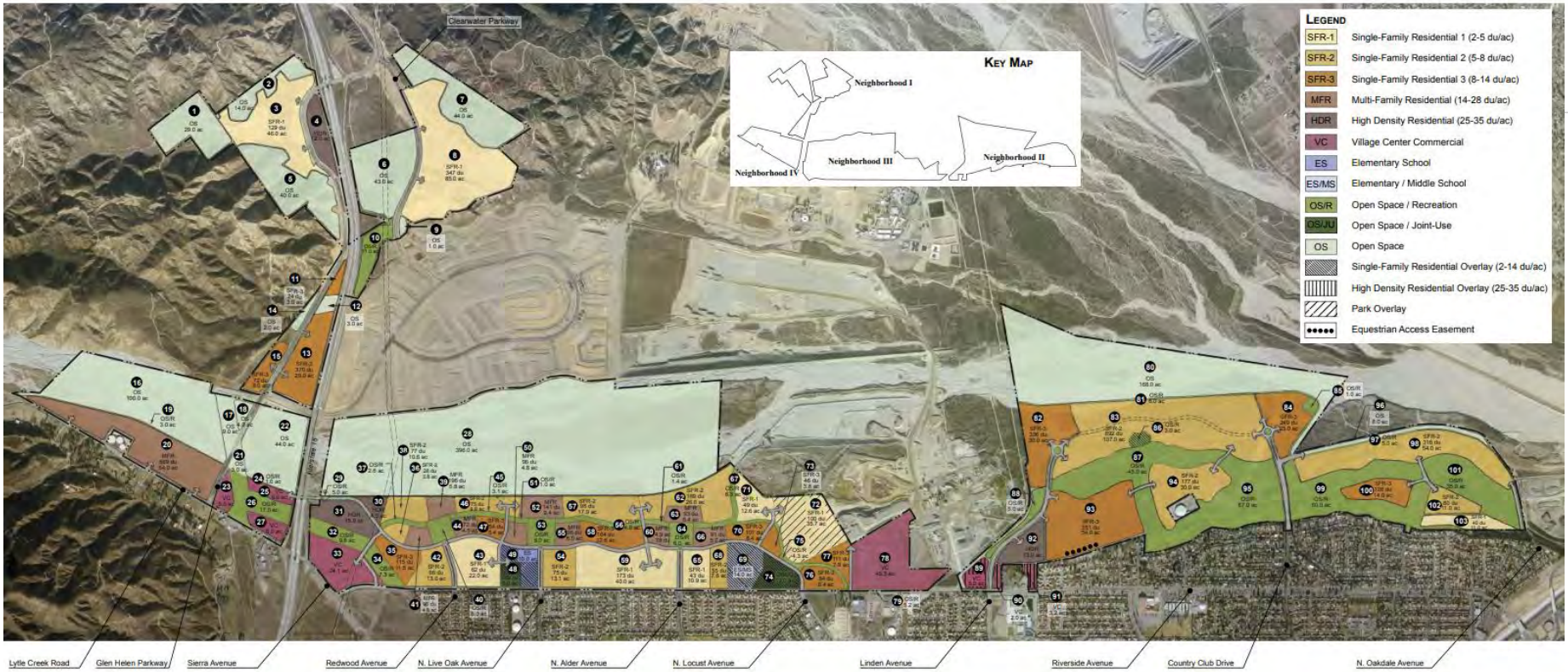


Figure B-4: Lytle Creek Ranch – Conceptual Land Use Plan



4. Development of Smaller Site Parcels

The City of Rialto has identified 67 parcels that are smaller than half an acre in size. Assembly Bill 1397 identifies general size requirements for candidate housing sites designated to accommodate low- and very low-income units of greater than half an acre and less than 10 acres in size.

These parcels have been identified as part of the Sites Analysis because most are located near one another, and large groupings are owned by the same property owners. Additionally, 14 of these 67 parcels are owned by the City of Rialto. The City has total site control to consolidate these sites to facilitate housing development through the 2021-2029 planning period.

A policy program is included in **Section 4: Housing Plan** to create a small lot consolidation program to facilitate development on these lots.

5. Development of Large Site Parcels

Supplemental to the sites identified to meet the City's RHNA allocation which fall within AB 1397 criteria, the City has identified one parcel which is larger than 10 acres.

This 10.08-acre site (Sites Inventory ID: 121) has been identified because it is vacant and located near other vacant lots with propensity to develop housing.

A rezone of the parcel located within the Gateway Specific Plan would create the opportunity to develop 281 housing units - this includes 155 housing units affordable to very low-/low-income households. Additionally, the currently vacant lot is located near existing senior housing units and resources, commercial and retail uses, as well as transit stops.

6. Accessory Dwelling Units

Accessory dwelling units (ADUs) are housing units which may be developed in addition to an existing single- or multi-family residential use. These housing units can be free-standing or attached to a primary structure and are intended to provide additional housing on an existing residential lot. Other ADUs provide housing for family members or are rented to members of the community.

As a result of new legislation and an increased effort by the City to promote ADUs, the City has seen an increase in applications. In 2020, the City permitted 14 ADUs and 32 in 2021. In accordance with State Law, ADUs are allowed in all zones that allow single dwelling unit or multiple dwelling unit development. Junior Accessory Dwelling Units (Jr. ADUs) are permitted only in single dwelling unit zones.

The City of Rialto has determined, based on past performance, that it is appropriate to anticipate the development of 72 accessory dwelling units from 2021 to 2029. **Table B-5** below displays the calculation and estimated projection for the 8-year planning period. To project the number of ADUs throughout the planning period, the City has multiplied by 1.5 the average assumption based on the average ADUs per year from 2018 to 2021 with the anticipation that new legislation and housing policies will increase the number of ADUs permitted.

Table B-5: ADU Assumptions	
Year	ADU Permitted
2029	9
2028	9
2027	9
2026	9
2025	9
2024	9
2023	9
2022	9
2021	32
2020	14
2019	0
2018	0
Projection Period Total	72

Additionally, to facilitate the development of ADUs available for lower income households, the City has developed relevant policies and programs (see **Section 4: Housing Plan**). The City assumes an affordability breakdown for ADUs based on the ADU Affordability Assumptions produced by the Southern California Association of Governments (SCAG) for each county. Using the SCAG assumptions for San Bernardino County, the City has allocated the following ADUs for each income category:

Table B-6: Accessory Dwelling Unit Projections by Income Category	
Income Category	Units
Low and Very Low-Income	40 units
Moderate Income	26 units
Above Moderate Income	6 units
TOTAL	72 units

To assist the City's ADU development projections, programs have been included in **Section 4: Housing Plan** to promote and incentivize the development of ADUs during the planning period.

7. Vacant Land to Accommodate Lower-Income Need

The City of Rialto has identified currently vacant land to accommodate 50.3 percent of the very low-/low-income RHNA housing units. This percentage is based on a conservative affordability assumption of 55 percent going towards lower income housing units. In total, 1,722 very low- and low-income units can be accommodated on vacant land, which amounts to 50.3 percent of the 3,424 very low- and low-income RHNA. The City would be able to meet a greater percentage of lower-income RHNA housing units with an affordability estimation of 65 percent per site; however, the City is taking the more conservative approach.

The City has accommodated over 50 percent of all lower-income units on vacant parcels therefore, the existing uses on the remaining sites identified to accommodate lower-income units are not presumed to

impede additional residential development. Existing uses on the nonvacant sites have also been evaluated for potential to accommodate future residential uses. Existing uses on nonvacant sites that have been identified as part of the Sites Analysis have been evaluated for propensity and represent parking lots, older commercial properties, and other non-residential uses with propensity to redevelop.

8. Suitability of Nonvacant Sites

As analyzed above, the City has identified sufficient vacant land to accommodate over 50 percent of its lower-income RHNA. The City of Rialto has identified additional unit capacity on nonvacant sites considering existing development on site and the feasible addition of housing, development standards for the respective zone, and the remaining acreage after subdivision. The City of Rialto conducted a comprehensive, parcel-by-parcel analysis of all nonvacant sites included in the Housing Element to ensure that these parcels can realistically accommodate housing development during the 2021–2029 planning period. In accordance with Government Code §65583.2(c), this analysis went beyond describing existing conditions and examined physical, economic, and regulatory factors that influence redevelopment potential.

First, the physical and economic characteristics of these parcels indicate high redevelopment feasibility. Many existing uses are aging, low-intensity structures such as 1950s–1980s retail strips, auto service shops, and single-story offices with significant deferred maintenance. Land-to-improvement value ratios reveal that in most cases, the underlying land is more valuable than the existing structures. Large portions of these parcels are dedicated to surface parking, often representing more than half of the site area, which constitutes surplus land that can be repurposed for multifamily housing without fully displacing existing commercial activity.

Second, market indicators strongly support redevelopment potential. Many identified sites have experienced frequent tenant turnover, persistent vacancies, or marginal business operations. Regional retail trends — including declining demand for large-format stores and the long-term impacts of e-commerce — further reduce the viability of existing uses. In contrast, Rialto has experienced growing developer interest in multifamily projects, as shown by recent pre-applications for projects along Foothill Boulevard, Riverside Avenue, and Baseline Road. These market conditions create incentives to transition underutilized commercial and institutional sites into higher-density residential or mixed-use development.

Third, the City's regulatory framework enhances redevelopment feasibility. The Housing Element includes a robust rezone strategy across seven Opportunity Areas that will increase allowable residential densities to between 30 and 39 dwelling units per acre. Sites currently zoned for commercial or mixed-use will be rezoned or overlaid to ensure that housing is permitted at realistic densities suitable for lower-income households. These rezonings, paired with existing density bonus provisions, AB 2097 parking reforms near transit, and City incentive programs (e.g., fee reductions, streamlined approvals, small-site consolidation), remove regulatory barriers and further encourage redevelopment of nonvacant sites.

Finally, the City's site-specific analysis demonstrates that existing uses will not impede redevelopment. For example, Site 4 (an older shopping center) contains excess parking that could be redeveloped with

multifamily housing; Site 19 (a church facility) has surplus land and is eligible for SB 4 streamlining; Site 28 (a large commercial parcel) and Sites 228 and 232 (big-box retail with oversized parking fields) can transition to residential or mixed-use projects consistent with recent trends in Rialto and the broader region. In each case, existing operations are either marginal, declining, or compatible with phased redevelopment, ensuring housing production potential.

Collectively, these findings demonstrate that the City has thoroughly evaluated nonvacant sites using multiple criteria—physical condition, economic performance, market demand, policy support, and recent redevelopment trends. The City's conclusion is that the existing uses on these parcels do not pose impediments to residential development. Instead, they represent realistic, immediate opportunities to meet RHNA obligations. This comprehensive justification satisfies both the statutory requirements of Government Code §65583.2(c) and the expectations of HCD for rigorous site-by-site evaluation.

Tables B-20 list the candidate sites identified, including notes detailing why each site was selected.

Lease Analysis

Existing lease agreements on infill and nonvacant properties present a potential impediment that may prevent residential development within the planning period. State law requires the City to consider lease terms in evaluating the use of nonvacant sites. The City made diligent efforts to review existing lease agreements, however the City does not have access to private party lease agreements or other contractual agreements amongst private parties. While the City does not have access to lease agreements, as these are private documents, staff have conducted an analysis to identify sites that show characteristics indicating they are likely to redevelop within the planning period including the following:

- Past performance redeveloping nonvacant sites
- An analysis of existing use
- Market analysis of land costs and development opportunities

Additionally, the **Section 4** of this Housing Element identifies programs to increase feasibility and encourage infill development in Rialto.

Past Experience Developing Nonvacant Sites for Residential Uses

Over recent years, communities in the region have been redeveloping nonvacant sites for residential uses. Past performance of nonvacant redevelopment for residential uses shows the viability of similar development within Rialto. **Table B-7** identifies projects in the region that have developed residential uses on nonvacant sites. The City has seen increasing trends toward infill development due to the fact that much of the new growth has occurred on sites that have transitioned from its agricultural roots, to very low-density housing to more urban densities. For example, the Rialto Airport area, once a regional airport, has transitioned to job-creating industrial/retail and residential uses. Much of the land in the City that experienced change utilized lands that traditionally have not been used as productively. Traditional 1950's corridor development, with large-scale parking fields, highly underutilized lots and similar commercial, retail and industrial uses have seen redevelopment as the City has transitioned to a more urban environment.

As **Tables B-20** through **B-22** show, a number of the identified candidate sites are underutilized with large parking lots. The example projects listed below were developed on highly underutilized lots with large scale parking fields. These past examples and current trends utilized sites that have similar attributes as the Candidate Sites identified in this Housing Element. These sites exhibit the following attributes:

- Highly underutilized land
- Significant Parking area in excess of current need
- Similar transitioning of adjacent parcels to residential and mixed uses
- General market interest and investment by the real estate and investment community
- Land values and existing improvement values that support transition to residential uses
- Age and use of existing structures
- Lack of property investment and existence of deferred maintenance issues
- Persistent vacancy status
- Adjacency to public transit and public services
- Access to educational, job and recreational opportunity

The attributes above are present in all identified sites, and similarities indicate the feasibility of redevelopment. Furthermore, the recent examples of redeveloped sites have similar attributes compared to the City's sites identified in **Table B-20**.

Regionally, redevelopment of underutilized non-residential sites, parking lots and older commercial centers are becoming more common – this provides an opportunity for future units to be located in close proximity to commercial and retail uses, resulting in a lower need to drive and close access to resources and employment opportunities. Many of the candidate sites were identified due to the presence of large parking lots that remain largely empty and underutilized. Redevelopment of those sites for residential would provide opportunities for existing businesses. In addition, existing commercial uses are generally older and lack recent investments. Site-specific details are provided for each candidate site in **Table B-20**. In addition, several programs are included in the Housing Plan to facilitate the development of these sites, including: monitoring of the sites, rezones for residential uses, rezoning of nonvacant sites used in prior Housing Elements, incentives for residential development, and removal of development constraints. Program 3H is also included to address AB 2097 regarding parking requirements near public transit. This new legislation is anticipated to provide further incentives to develop residential on those nonvacant sites along transit corridors.

Table B-7: Examples of Local Development of Nonvacant Sites for Residential Uses				
Project Address/ APN	**Dwelling Units**	**Zoning**	**Use Prior to Redevelopment**	**Project Description**
Tuscan Apartments (Under Construction) 16534 Arrow Blvd.	17	FBC (Transitional)	Single Family Home	A proposed 17-unit multifamily development.
Paseo Verde Apartments – North side of Valley Boulevard between Cypress Avenue and Juniper Avenue	150	FBC (Transitional)	Single Family Home	150 fully affordable units redeveloped on previously single-family home.
8185 Banana Avenue	28	R-1	Single Family Home	Although the zoning is R1 – the developer utilized the Boulevard Overlay at the time to do multi-family units. There are 28 condos redeveloped on a lot with a previous single-family home
Windrows Project-16408 Valencia Avenue	105	FBC (Transitional)	Single Family Home	Lot which contained a single-family home was redeveloped in the FBC transitional zone to accommodate 105 multifamily units
Rosena Fountains Apartments	69	FBC (Multi-Family)	Gathering Hall	A proposed 69-unit multifamily development
Nuevo Apartments	29	R-5	Parking Lot	A proposed 5-story mixed-use development with 29 proposed apartment units.
Village at Sierra	106	FBC (Retail)	Commercial	A senior housing development.
The Plaza at Sierra	90	FBC (Station Area)	Commercial Uses	A proposed 90-unit affordable senior housing development

The City has made appropriate findings as part of its adoption Resolution that the sites identified in the Housing Element to accommodate growth are sufficient and the sites features are not an impediment to future residential development.

Surplus Facilities Housing

Much of the City's commercial corridors can be traced back to the post-war era when there was a surge in demand for new housing and businesses. Many shopping centers and malls were built during this time and are many are still used as commercial uses today. As the City has continued to develop, these corridors have seen redevelopment, with large parking lots and underutilized spaces being repurposed. The post-COVID period saw a change in shopping patterns which led to the decrease in demand for physical stores (i.e., Online shopping), resulting in less need for parking at these sites. The City of Rialto has the opportunity for infill development by utilizing surplus facilities like commercial parking lots for residential development. Infill development is more sustainable than greenfield development as it makes use of existing infrastructure and resources. As shown in Table B-20, the City of Rialto has the opportunity for

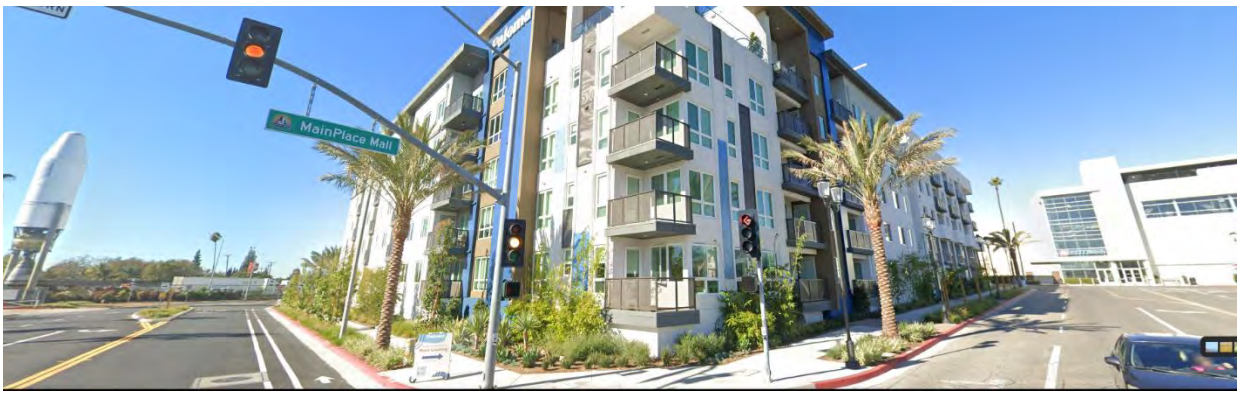
infill development through the utilization of surplus facilities like commercial parking lots. The City analyzed recent examples of cities that have successfully redeveloped surplus parking lots into higher density residential such as apartments and townhomes.

Redevelopment of surplus facilities, such as underutilized parking lots for commercial uses, provides sustainable infill opportunities because these sites already benefit from established infrastructure, access to transit, and adjacency to residential neighborhoods and services. Infill development avoids the costs and impacts of greenfield expansion while contributing to corridor revitalization. The City has carefully reviewed recent case studies where surplus parking and older commercial uses have been repositioned into higher-density housing and has compared them directly with candidate sites in Table B-20.

Paloma at the Main Place Mall in Orange (Figure B-5) was previously a surface parking lot and is now apartments. This pattern is directly analogous to many of the City's Candidate Sites such as Sites 23, 24, and 28, which are currently occupied by retail pads with surface parking that takes up over half the parcel area. Like Paloma, these Rialto sites benefit from corridor frontage, transit access, and large contiguous buildable acreages that can support multifamily blocks while retaining portions of existing commercial.

Figure B-5: Paloma at the Main Place Mall in Orange

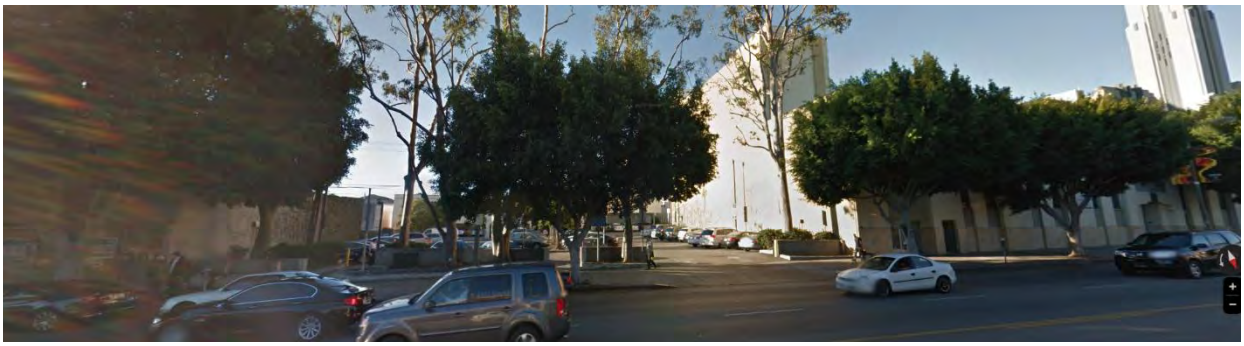
Prior Use: Surface Parking Lot for Main Place Mall



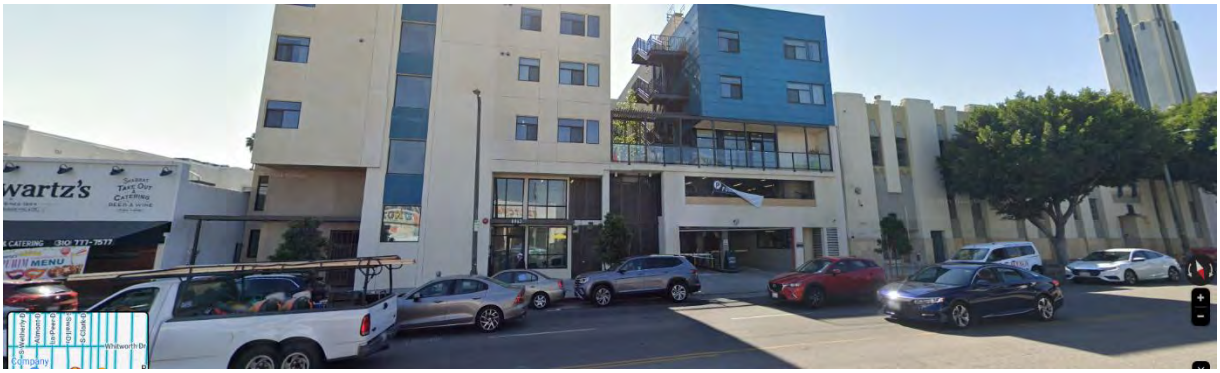
Current Use: Apartment Homes

Howard and Irene Levine Senior Community in Los Angeles (Figure B-6) was built on surplus parking for surrounding commercial. Similarly, many Candidate Sites such as Sites 51, 67, and 213 each contain commercial structures with expansive surface parking. These parcels have favorable land-to-improvement ratios, adjacency to residential neighborhoods, and the scale necessary to accommodate new housing while right-sizing existing parking demand.

Figure B-6: Howard and Irene Levine Senior Community at 8862 W Pico Blvd, Los Angeles



Prior Use: Surface Parking Lots for surrounding commercial uses



Current Use: Senior Housing

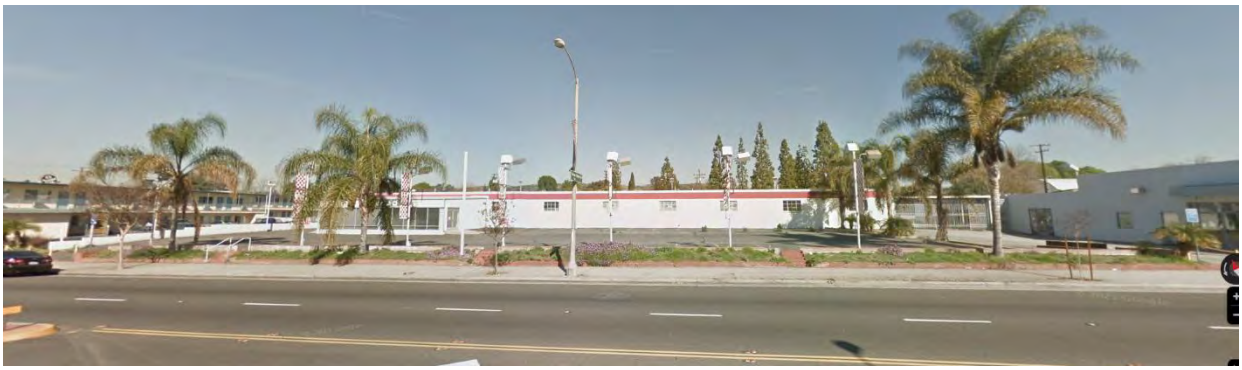
Whittier Park Place and Catalina Apartments in Whittier (Figures B-7 and B-8) were developed on former auto-oriented sales lots and dealerships. In Rialto, many Candidate Sites such as Sites 216, 226, and 227 exhibit the same characteristics — marginal auto-oriented or single-use retail pads with surplus frontage and parking lots. The feasibility factors are parallel: declining auto-sales formats, strong market demand for infill housing, and supportive zoning changes under Program 2B (Rezoning).

Figure B-7: Whittier Park Place at Whittier Park Place at 14660 Whittier Blvd

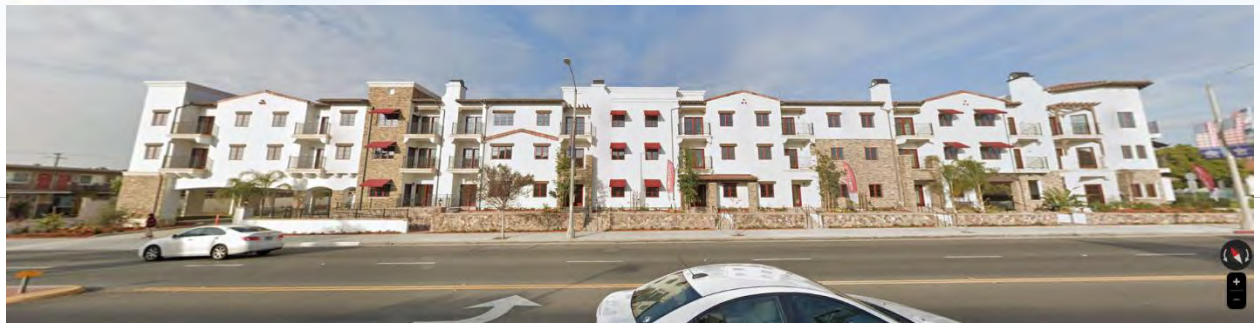
Prior Use: Vacant Car Sales Parking Lot for Toyota Dealership

Current Use: Apartment Complex

Figure B-8: Catalina Luxury Apartments at 14339 Whittier Blvd, Whittier



Prior Use: Vacant Mitsubishi Car Dealership and Service Center



Current Use: Luxury Apartments

The Mark Apartments in Riverside (Figure B-9) converted a strip-commercial parking field into apartments, much like Rialto's Candidate Sites such as Sites 228, 229, and 232. These are large parcels occupied by big-box retail or partially vacant lots with oversized parking. Their scale (over 4 acres each), adjacency to transit corridors, and declining viability of big-box formats make them prime redevelopment candidates.

Figure B-9: Mark Apartments at 3605 Market St, Riverside, CA

Prior Use: Surface Parking Lot for Strip Commercial

Current Use: Apartment

Mission Heritage Plaza in Riverside (Figure B-10) demonstrates how even a marginal service use with surplus parking was repositioned into workforce housing. Many Candidate Sites such as Sites 227 and 232 in Rialto show similar conditions — marginal uses on large parcels with significant underutilized area, well-suited for mixed-use or multifamily housing under Programs 2B (Rezoning), 2R (Residential Incentives), and 4B (Remove Constraints).

Figure B-10: Mission Heritage Plaza at 3933 Mission Inn Avenue, Riverside CA

Prior Use: Fair Housing Council of Riverside County, Inc.

Current Use: Workforce Housing Apartments

The feasibility factors of these representative case studies — excess land coverage by parking, low land-to-improvement ratios, corridor adjacency, large buildable acreages, phasing potential, and favorable market trends — to Rialto's Candidate Sites, the City demonstrates that surplus facilities can feasibly and realistically redevelop. Programs **2B, 2R, 2O/2P, 2H, 2S, and 4B** provide the regulatory, financial, and streamlining support necessary to ensure implementation.

As such, the redevelopment of the City's Candidate Sites into housing is not speculative but grounded in clear precedent and supported by the same feasibility criteria applied throughout the City's sites inventory. **Table B-20** sites mirror the characteristics of the case studies, confirming that Rialto's identified candidate parcels are similarly poised for redevelopment within the planning period.

Foothill Boulevard Example Sites

The Foothill Boulevard area includes a series of parcels that illustrate how underutilized commercial and parking areas provide realistic capacity for infill housing. These sites share feasibility characteristics already demonstrated in regional case studies (Figures B-5 through B-10) and in other cities where surplus parking and marginal commercial uses have transitioned into multifamily housing. Each parcel demonstrates one or more of the key redevelopment feasibility factors: favorable land-to-improvement ratios, sufficient buildable acreage to achieve economies of scale, adjacency to transit, services, and existing residential, market conditions such as declining demand for retail or auto-oriented uses, and

regulatory and financial support from City programs (2B Rezoning, 2R Residential Incentives, 2O/2P Lot Consolidation, 2H SB 35 Streamlining, 2S Surplus Land Act, and 4B Remove Constraints).

Sites 23, 24, and 28 (Figures B-11 to B-13): These parcels are developed with small commercial pads and associated surface parking lots that occupy more than half the lot area. Their land-to-improvement ratios are favorable, and the buildable acreages (2–5 acres each) allow efficient residential block layout while retaining portions of existing commercial. These conditions are directly comparable to Paloma at Main Place Mall (Orange, Figure B-5), where excess parking was redeveloped into apartments while the mall retained operations. Redevelopment of Sites 23, 24, and 28 would follow the same pattern — phasing new multifamily housing while existing commercial continues operating.

Figure B-11: Site 23 Existing Usage

Figure B-12: Site 24 Existing Usage

Figure B-13: Site 28 Existing Usage

Sites 51 and 67 (Figures B-14 and B-15): Both contain marginal commercial or restaurant uses surrounded by expansive parking. Site 51 also abuts existing residential, creating a strong adjacency for absorption. These parcels have ample buildable space for phased redevelopment, where circulation and parking can be reconfigured without impeding current uses. This mirrors the Howard and Irene Levine Senior Community (Los Angeles, Figure B-6), where underutilized parking for commercial uses was transitioned into senior housing. Supported by Programs 2B and 2R, Sites 51 and 67 are likely to redevelop given their size, context, and market trends toward infill.

Figure B-14: Site 51 Existing Usage

Figure B-15: Site 67 Existing Usage

Sites 213 and 216 (Figures B-16 and B-17): These parcels are located at prominent intersections with large corner parking lots and low-intensity commercial. Their visibility, access to Baseline Road and Riverside Avenue, and surplus parking fields make them prime candidates for reinvestment. The parcels are directly comparable to Whittier Park Place and Catalina Apartments (Whittier, Figures B-7, and B-8), which converted auto-oriented dealership and service parcels into apartments. Programs 2O/2P (Lot Consolidation) and 2H (SB 35 Streamlining) ensure regulatory feasibility, while market evidence of declining demand for single-use auto or strip commercial further supports redevelopment.

Figure B-16: Site 213 Existing Usage

Figure B-17: Site 216 Existing Usage

Sites 226 and 227 (Figures B-18 and B-19): Site 226 is a vacant corner parcel adjacent to commercial uses, while Site 227 contains a marginal single commercial use with expansive parking. Both sites have high redevelopment probabilities due to underutilization and adjacency to active commercial and residential corridors. These conditions parallel Mission Heritage Plaza (Riverside, Figure B-10), which repositioned a marginal service use with parking into workforce housing. Supported by Programs 2B, 2R, and 2F (AB 1397 compliance), these parcels are realistic redevelopment candidates.

Figure B-18: Site 226 Existing Usage

Figure B-19: Site 227 Existing Usage

Sites 228, 229, and 232 (Figures B-20 to B-22): These are large parcels currently developed with big-box retail, vacant lots, or marginal recreational uses, all accompanied by oversized parking fields. Their scale (4–10 acres) ensures economies of delivery preferred by builders and lenders, while market evidence confirms that big-box retail formats are declining in viability. The Mark Apartments (Riverside, Figure B-9) demonstrates the feasibility of converting strip-commercial parking lots into multifamily. By the same logic, Sites 228, 229, and 232 can accommodate hundreds of units at planned densities (30–39 du/ac) with supportive programs (2B, 2R, and 4B).

Figure B-20: Site 228 Existing Usage

Figure B-21: Site 229 Existing Usage

Figure B-22: Site 232 Existing Usage

Taken together, Sites 23, 24, 28, 51, 67, 213, 216, 226, 227, 228, 229, and 232 show that Rialto's Candidate Sites replicate the same feasibility conditions as the case study redevelopments highlighted in Figures B-5 through B-10. Across these parcels, redevelopment feasibility is supported by favorable land-to-improvement ratios and large surface parking fields, adequate buildable acreage for phasing and economies of scale, adjacency to services, transit, and residential neighborhoods, declining market demand for existing uses (strip retail, auto, big-box), and the City's enforceable housing programs that remove barriers and incentivize redevelopment.

Accordingly, these Foothill Boulevard example sites demonstrate realistic redevelopment potential and further confirm that Rialto's Table B-20 inventory meets HCD's statutory requirement to evaluate existing uses and show that identified nonvacant sites are feasible for housing development within the planning period.

Parking Strategies for Mixed-Use and Operating Nonvacant Sites

The City has evaluated whether operating uses, including parking demand, would impede additional residential development and has determined that appropriate, site-specific, feasible strategies will avoid such impediments.

To ensure ongoing operations can continue, the City requires project-level parking analysis for housing on nonvacant sites. This requirement will continue in the 6th Cycle Planning period to ensure parking demand is addressed. Where a site is within ½ mile of a major transit stop, AB 2097 prohibits the City from imposing minimum off-street parking requirements, allowing residential projects to proceed without adding new off-street spaces and instead rely on demand-management measures and on-street management where appropriate. For sites not covered by AB 2097, the City will consider requests for reduced ratios supported by a shared-parking study and may allow unbundled residential parking, time-limited visitor spaces, and on-street supply optimization to right-size parking without constraining feasible housing capacity.

Shared Parking and Operational Tools

Many candidate sites contain daytime-peaking commercial or institutional uses adjacent to evening-peaking residential demand, creating opportunities for shared parking through recorded agreements, cross-access easements, and mixed-use parking districts. The City will encourage shared-use agreements between residential and nonresidential tenants, operational measures during peak overlap periods, posted wayfinding, curbside loading management, physical efficiency improvements (restriping to current stall dimensions, tandem or mechanical parking where permitted, bicycle/micro-mobility parking, and transportation demand management (TDM) strategies such as transit pass subsidies, car-share spaces, preferential parking for carpools, and secure bike rooms. Together, these measures ensure that existing businesses can maintain operations while residential infill is constructed and occupied.

Replacement and Phased/Temporary Parking.

Where redevelopment of a portion of a site would eliminate existing private parking that an ongoing use relies upon, the City will typically require replacement parking to be provided on-site or on an off-site lot secured by long-term agreement, with phasing to avoid service disruptions (e.g., temporary surface lots or interim shared-use spaces during construction with a transition to structured or consolidated parking at buildout). Projects may satisfy replacement needs through any combination of: structured on-site parking, shared parking in a common facility serving multiple parcels, off-site parking within a reasonable walking distance secured by a recorded agreement, or verified demand-reduction commitments (e.g., unbundled residential parking, carpool benefits). This layered approach demonstrates that parking will not impede reuse of nonvacant sites for housing while maintaining continuity for existing uses.

Suitability of Non-Vacant Sites: Objective Indicators & Evidence

The City's non-vacant sites share repeatable, objective indicators of underutilization—low improvement-to-land ratios, high surface-parking coverage, aging/lightweight improvements, and corridor locations with services and transit—that have historically transitioned into housing in Rialto and peer corridors. These conditions appear across a small set of site archetypes: (A) auto-oriented pads (small buildings, outsized drive aisles), (B) strip-commercial centers (shallow suites, sea-of-asphalt), (C) big-box/parking fields (large, reconfigurable tracts), (D) institutional/civic & faith-based (surplus parking with by-right/streamlined pathways), (E) motel/hospitality (aging stock with modest footprints), and (F) micro/sliver infill & corner lots (parcel remnants that close streetwall gaps). For each archetype, feasible multifamily prototypes are well established—3–4-story stacked flats, compact podiums, or wraps—with internalized parking, consolidated curb cuts, and a landscaped street edge that improves safety and walkability while stepping massing toward adjacent neighborhoods.

These archetypes are program-enabled: Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives) secure full residential yield; Program 4B (Remove Development Constraints) updates objective standards (setbacks, height transitions, open-space, loading, block access) to match today's prototypes; Program 3H (AB 2097 Parking Near Transit) right-sizes stalls where eligible; Programs 2O/2P (Lot & Small-Lot Consolidation) unlock coordinated access and phasing; and Program 2H (SB 35 Streamlining) provides ministerial approval where deeper affordability is pursued. Together with illustrative scenarios (small pad, strip center, big-box) that show phased reuse while businesses operate, the record demonstrates realistic capacity on non-vacant sites across the planning period. Comparable corridor transitions in the region—auto pads, strip clusters, and large parking fields converting to multifamily—corroborate market feasibility and lender-favored delivery scales, while public-realm upgrades (fewer driveways, shade, lighting, active corners) ensure neighborhood compatibility and measurable corridor benefits.

Developer Interest

The City has a high level of interest in redevelopment of existing marginal uses. This strong interest is exemplified by the variety of pre-applications, proposed projects, and on-going discussions with potential developers. Table B-8 shows a list of active proposed projects in the City.

Table B-8: List of Active Proposed Projects	
Description of Projects	**Descriptor**
Multi-Family Project located north of the intersection of Foothill Boulevard and Linden Avenue on the East side of Linden. This high-density project could potentially build up to 70 units.	Pre-application coordinated and on-going discussion with applicant. The project is proposed in the Housing Element Opportunity Area 1 – Foothill Boulevard Specific Plan.
Multi-Family Project located on NEC of Foothill Boulevard and Spruce Avenue Multiple for 82 multifamily units. Across from the "Foothill Grove" development which previously exhibited the same characteristics as the parcel.	Pre-application submitted with multiple meetings held with the applicant. The project is proposed in the Housing Element Opportunity Area 1 – Foothill Boulevard Specific Plan.
Multi-Family Project located on the intersection of Lilac Avenue and Baseline Road for 20 multifamily units.	Pre-application submitted with multiple meetings held with the applicant. The project is proposed in the Housing Element Opportunity Area 5 – Baseline Parcels.
Multi-Family Project is located east of the intersection of Riverside Avenue and Valley Boulevard.	Pre-application coordinated and on-going discussion with applicant. The project is proposed in the Housing Element Opportunity Area 4 – Rialto Central Area Specific Plan.
Mixed-Use Project is located at 223 South Riverside Avenue for 84 units.	Pre-application coordinated and on-going discussion with applicant. The project is proposed in the Housing Element Opportunity Area 4 – Rialto Central Area Specific Plan.
Mixed-Use Project is located on the intersection of SEC of San Bernardino Avenue and Riverside Avenue for 89 units.	Pre-application submitted with multiple meetings held with the applicant. The project is proposed in the Housing Element Opportunity Area 3 – Gateway Specific Plan.

Strong interest from developers suggests a higher probability of residential growth within the planning period. Pre-applications and inquiries showcase this demand, with a recent support letter received shown below.

Figure B-23: Support Letter Examples

Warmington
RESIDENTIAL

March 25, 2024

Colby Cataldi
Director of Community Development
City of Rialto
150 S. Palm Avenue
Rialto Ca, 92376

Re: City of Rialto 6th Cycle Housing Element Review and Foothill Central Specific Plan Amendment

Dear Mr. Cataldi,

We want to express our support for the Rialto 6th Cycle Housing Element and Foothill Central Specific Plan Amendment. Our interest centers on our plan to process plans to develop approximately 5-acres at the northeast corner of Foothill Boulevard and Spruce Avenue.

We are submitting an application for a new residential development and the new standards will allow for a greater level of flexibility and density appropriate for the site.

We look forward to working with you and the other City staff in all of our efforts to develop this new community.

If you have any questions, please call me at (714) 557-5511.

Best Regards,

Joe Ofteliè
President, Southern California Division

Cc: Greg Ocasek, Warmington Residential, Project Consultant

3090 Pullman Street, Costa Mesa, California 92626 t: 714.557.5511 f: 714.641.9337 HomesByWarmington.com

Rialto Housing Partners LP
Metro View Community

March 4, 2024

Mr. Paul Gonzales
Community Development Manager
Community Development Department
150 S. Palm Avenue, Rialto, CA 92376

Re: Support Letter / 6th Cycle Housing Element

Dear Mr. Gonzales,

This letter is in support of the City of Rialto's proposed Housing Element, as defined in the 6th Cycle.

This effort will help in the development of high-density multifamily and senior housing though out the city.

Our firm will continue to keep Rialto on our radar for future developments.

Sincerely,

Joshua LaBarge
Member

9. Selection of Sites to Accommodate Remaining Need

The City has identified sites to meet Rialto's very low- and low-income RHNA need based on the size, density, and capacity requirements set forth by AB 1397. Sites were also selected based on their realistic viability to accommodate lower-income housing within the 2021-2029 planning period.

Additionally, the City identified sites based on their access to resources, proximity to additional residential development, transportation and major streetway access, and resources and opportunity indicators. **Section 3** outlines all fair housing, opportunity indicators, and environmental resources in Rialto. The City has available vacant land to accommodate lower-income housing but understands that future housing development opportunity will also occur as infill, on previously developed properties. Pursuant to Government Code Section 65583.2 (g)(2), if the Housing Element utilizes 50-percent of more of its lower income RHNA needs on non-vacant sites, it must demonstrate that the existing uses are not an impediment to additional residential development in the planning period.

The City of Rialto has identified currently vacant land to accommodate 50.3 percent of the very low-/low-income RHNA housing units. This percentage is based on a conservative affordability assumption of 55 percent going towards lower income housing units. In total, 1,722 very low- and low-income units can be accommodated on vacant land, which amounts to 50.3 percent of the 3,424 very low- and low-income RHNA. The City has accommodated over 50 percent of all lower-income units on vacant parcels therefore, the existing uses on the remaining sites identified to accommodate lower-income units are not presumed

to impede additional residential development. Existing uses on the nonvacant sites have also been evaluated for potential to accommodate future residential uses.

Furthermore, the City accounted for sites currently in the pipeline as well as accessory dwelling units anticipated to be permitted and developed during the 2021-2029 planning period. After considering the lower-income potential unit yield from ADU projections and sites under existing zoning densities, the City is left with a remaining need of 2,178 lower income units.

The strategies outlined below are designed to accommodate the remaining very low- and low-income need. To plan for lower-income housing, the City has identified seven Opportunity Areas where 1) permitted density will be increased through Specific Plan amendments or 2) a new zoning district will be created or 3) sites will be rezoned to an existing zoning designation allowing increased density. The strategies for each of these opportunity Areas, as summarized in **Table B-9** below, are detailed in this section.

Table B-9: Very Low-/Low-Income Opportunity Area Rezone Strategy by Opportunity Area

Opportunity Area	Anticipated Feasible Acreage	Assumed Rezoned Density	Potential Total Very Low-/Low-Income Units
1 – Foothill Boulevard Specific Plan	159 acres	35 du/ac	2,443 units
2 – North Riverside Avenue	17 acres	39 du/ac	369 units
3 – Gateway Specific Plan	20 acres	35 du/ac	307 units
4 – Rialto Central Area Specific Plan	14 acres	38 du/ac	189 units
5 – Baseline Parcels	9 acres	35 du/ac	88 units
6 – Baseline Shopping Center	57 acres	30 du/ac	744 units
7 – Housing Opportunity Overlay	46.7 acres	30 du/ac	583 units
TOTAL	322.7 acres	-	4,723 units

Opportunity Area 1 - Foothill Boulevard Specific Plan

The Foothill Boulevard Specific Plan is intended to result in quality new development to encourage revitalization of existing development. The Specific Plan covers approximately 300 acres and currently permits commercial districts and two residential land use districts – Residential-Mixed Use (R-MU) and Residential-High Density (R-HD). Both residential districts, and two additional commercial districts, allow for development to provide opportunity for innovative, high-quality development. Each of these districts has a pedestrian focus and allows for some degree of residential development. In commercial districts, residential uses must be combined with commercial uses.

Of the total 300 acres within the Foothill Boulevard Specific Plan, the City has identified approximately 159 acres of sites as having opportunity and propensity to redevelop residentially. This selection of sites is projected to accommodate a total of 4,437 housing units, including 2,443 housing units affordable to very low-/low-income households. Currently, the Specific Plan permits residential densities up to 30 dwelling units per acre, but only when developing on at least 3 acres. An amendment to the Specific Plan to accommodate 35 dwelling units per acre on the 159 acres of parcels identified within the inventory

would create the opportunity for 2,443 very low-/low-income housing units. **Table B-20** shows the specific evidence supporting the infill parcels identified in Opportunity Area 1 – Foothill Boulevard Specific Plan Sites. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – Foothill Boulevard Specific Plan

- **Underutilized Parcels:** These parcels have rather large parking lots supporting traditional auto-oriented retail that was developed in the past. Many Foothill Boulevard properties include large parking fields that are highly underutilized due to the transition away from an auto-oriented commercial corridor. There is an oversupply of retail parking on parcels that does not generate significant parking demand. Additionally, the trend toward more compact, efficient retail development and the significant rise online shopping, Amazon, Doordash and other related services have substantially reduced the need and market support for traditional retail development. Existing parking fields on these parcels constitute generally more than half of a gross site acreage are highly utilized and ripe for reuse and repurposing.
- **Underperforming Retail:** As shown in **Figure B-24**, the candidate sites are located on both sides of Route 66. This area is a traditional auto-oriented commercial corridor with big box retail and large surface parking. The commercial developments are generally older and exhibit signs of underinvestment and deferred maintenance. Additionally, existing commercial sites are not conducive to current trends in retail seen in the region and have resulted in higher vacancy rates, marginal tenant mix and higher rates of turnover. There are empty lots along the corridor indicating a lower demand for retail uses. Some of these sites have been actively on the market for sale. Existing commercial uses and activities on these sites include aging, underperforming retail with vacant buildings/leasable space and/or small single retail tenants with majority surface parking on the lot. Market trends in Rialto indicate consumers have generally shifted away from larger retail uses serving uses, such as services stations, motels, fast food, etc. to smaller scale uses. This has provided an opportunity to transition a traditional regional corridor into a more productive, locally serving activity center with a mature transition infrastructure.

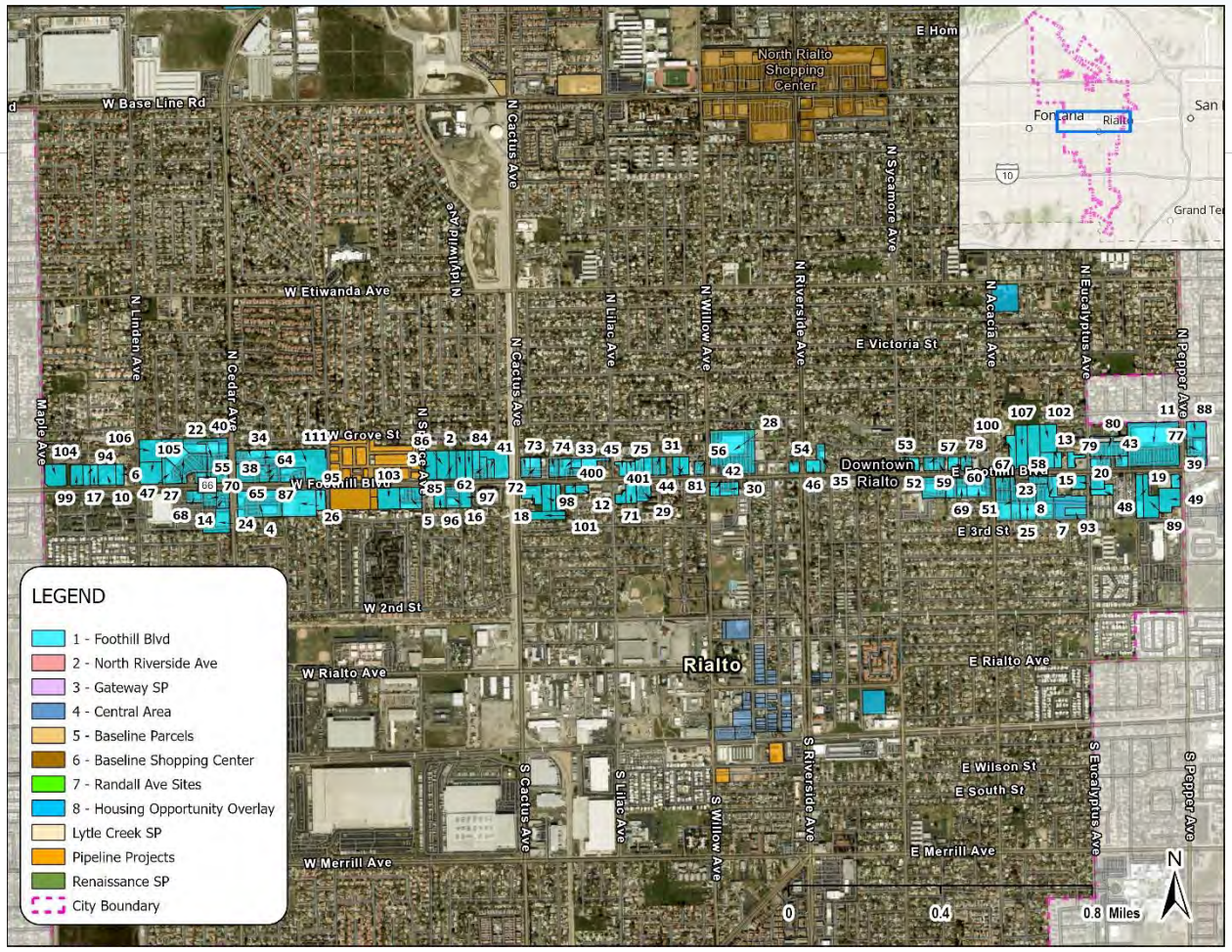
The parcels identified as part of the Sites Inventory were included due to potential for revitalization of older shopping centers and vacant lots. As is the intent of the Specific Plan, the sites identified would create opportunities for mixed-use developments with a focus on integrating residential and commercial uses to facilitate walking.

Table B-10 below displays the capacity and opportunity in this Opportunity Area which can help accommodate the City's RHNA allocation. **Figure B-24** below maps the sites identified within this Opportunity Area 1 which can help accommodate a portion of the City's RHNA allocation.

Table B-10: Opportunity Area 1 - Foothill Boulevard Specific Plan Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
159 acres	35 du/acre	2,443	227	1,767	4,437

Figure B-24: Opportunity Area 1 – Foothill Boulevard Specific Plan



Opportunity Area 2 – North Riverside Avenue

The City has identified Opportunity Area 2 as having potential for high density multiple-family housing developments. Opportunity Area 2 is located on both sides of North Riverside Avenue and between Foothill Freeway and Walnut Avenue. This area is predominantly zoned Neighborhood Commercial (C-1) and Administrative-Professional-Institutional (A-P).

Opportunity Area 2 has potential to accommodate 673 housing units, including 369 housing units affordable to very low-/low-income households. This would require the creation of an overlay or similar policy strategy over the Opportunity Area's total 17 acres to allow residential development at a maximum density of 48.4 dwelling units per acre and an assumed density of 39 dwelling units per acre. **Table B-20** shows the specific evidence supporting the infill parcels identified in Opportunity Area 2 – North Riverside Avenue. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – North Riverside Avenue

- **Underutilized Sites:** Identified sites in this focus area are predominately vacant and/or highly underutilized land. Given the marginal use of these lots and their proximity to other vacant lots,

the probability of development is high. Sites with stable retail or commercial uses have been excluded from consideration, as they are not deemed to likely redevelop for an extended period of time.

- **Marginal Use:** Existing uses identified on the North Riverside parcels are generally uses that utilize a comparatively small portion of the site and the sites' vacant portion far exceeds that of the existing use. While the City acknowledges existing uses could potentially continue, the significant underutilization of the site provides opportunities to incorporate residential development if an existing use remained.
- **Existing Places of Worship**: There is one parcel with an existing church use. The church is on a site that is highly underutilized with a majority of vacant land on the parcel. The amount of land vacant land on the site could accommodate residential uses, while continuing existing uses. Furthermore, Senate Bill 4 (SB 4), provides streamlined process for religious organizations to develop affordable housing on their property. Parking and undeveloped space takes up a significant portion of the lot, which could be used to provide housing opportunity. Given the high underutilization of the lot, adjacency to other residential uses, and SB 4, the probability of residential opportunity is deemed very high.

The parcels identified as part of the Sites Inventory were identified due to their vacant conditions and potential for development of housing on underutilized parcels. Additionally, the identified parcels meet the criteria required by AB 1397 for sites with capacity to accommodate very low-/low-income units.

Table B-11 below displays the capacity and opportunity in this Opportunity Area which can help accommodate the City's RHNA allocation. **Figure B-25** below maps the sites identified within this Opportunity Area 2 which can help accommodate a portion of the City's RHNA allocation.

Table B-11: Opportunity Area 2 – North Riverside Avenue Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
17 acres	39 du/acre	369	40	264	673

Figure B-25: Opportunity Area 2 - North Riverside Avenue

Opportunity Area 3 – Gateway Specific Plan

The Gateway Specific Plan is intended to revitalize the Gateway area and entry into Rialto. The Specific Plan is located north of the 10 Freeway, south of San Bernardino Avenue, east of Spruce Avenue, and west of Sycamore Avenue. The Gateway Specific Plan currently allows for office and industrial parks, as well as commercial uses.

Of the 311 total acres within the Gateway Specific Plan, the City has identified 20 acres of sites as Opportunity Area 3 to create the opportunity for housing developments near commercial centers and job sites. Opportunity Area 3 is currently zoned for Retail Commercial (R-C), Office Park (O-P), and Industrial Park (I-P). An amendment to the Gateway Specific Plan to add a new residential zoning district over the 38 acres of parcels included within the sites inventory would create the opportunity for high-density residential development. A new residential zone at an assumed average density of 35 dwelling units per acre would accommodate a total of 558 housing units, including 307 housing units affordable to very low-/low-income households. Pending implementation, this zone could have a minimum density of 20 du/ac and a maximum of 50 du/ac. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – Gateway Specific Plan

- **Underutilized Sites**: These sites are currently vacant parcels. Given the absence of uses or activities on these lots, they are the ripe for development and present viable housing opportunities.
- **Recent Development:** Recent residential development has occurred on Wildrose Avenue, adjacent to these sites, providing new residential opportunities. Additionally, infrastructure, sidewalks and other amenities are installed, providing less need for significant improvements and will contribute to site access for autos, pedestrians, and public transit.
- **Availability of Services:** The Gateway Specific Plan sites are adjacent to a variety of services and facilities ideal to accommodate the needs of lower income residents. These uses include the Grace Vargas Senior Center, Rialto Post Acute Care Center, Rialto Assisted Living and the Rialto Village retail center. The Arrowhead Regional Medical Center is also in close vicinity. There are approximately 9 available bus routes/stops withing 2,000 feet of the identified parcels.

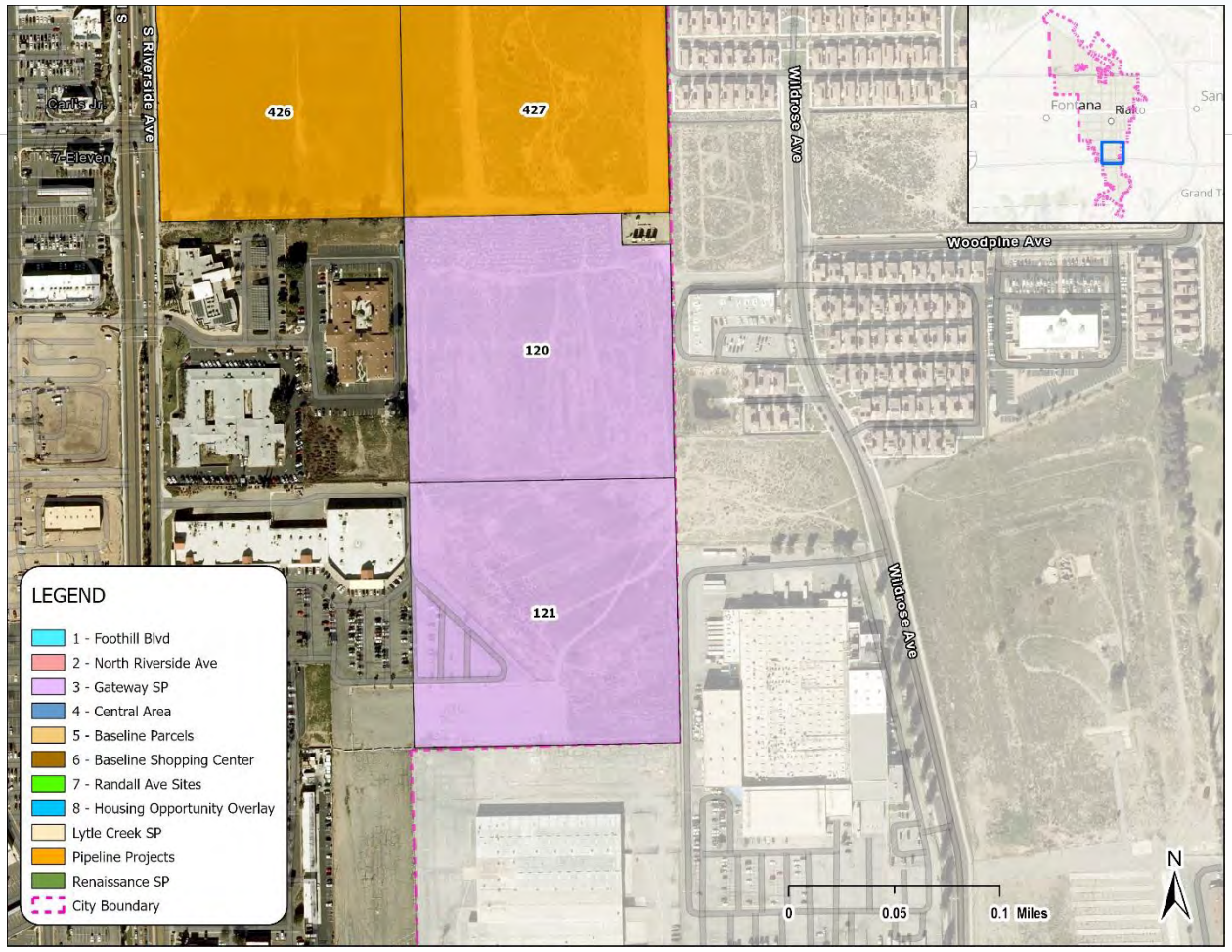
The parcels selected as part of the Sites Analysis were identified as they are currently vacant. These parcels are also located in the vicinity of the Grace Vargas Senior Center, Rialto Assisted Living, and Rialto Post-Acute Care Center. Additionally, the Opportunity Area is located near commercial and retail uses, as well as transit bus stops. Potential housing development in this area could create opportunities for intergenerational connections with the nearby senior center, as well as promote walking to and from local commercial needs and amenities. The parcels identified meet the criteria required by AB 1397 for sites projected to accommodate very low-/low-income units.

Table B-12 below displays the capacity and opportunity in this Opportunity Area to help accommodate the City's RHNA allocation. **Figure B-26** below maps the sites identified within this Opportunity Area 3 which can help accommodate a portion of the City's RHNA.

Table B-12: Opportunity Area 3 – Gateway Specific Plan Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
20 acres	35 du/acre	307	28	223	558

Figure B-26: Opportunity Area 3 – Gateway Specific Plan



Opportunity Area 4 – Rialto Central Area Specific Plan

The Rialto Central Area Specific Plan is in the City's downtown area along Riverside Avenue, north of Merrill Avenue, and south of Foothill Boulevard. The intent of the Rialto Central Area Specific Plan is to provide residential uses in conjunction with commercial uses to improve the economic vitality of the central area of Rialto. Currently, a variety of residential densities are permitted, in addition to commercial and office uses.

Of the 107 acres within the Central Area Specific Plan, the City has identified a collection of parcels totaling 14 acres in the Downtown Rialto area as having potential for housing development at an increased density. The creation of a new overlay district, or similar policy strategy, permitting up to 48 dwelling units per acre (with an assumed density of 38 dwelling units per acre) applied to these parcels has the potential to result in 350 new housing units, including 189 housing units affordable to very low-/low-income households. These parcels identified as part of the Sites Analysis are either currently vacant or have the potential to be redeveloped to include housing units. The identified parcels meet the criteria required by AB 1397 for sites with the capacity to accommodate very low-/low-income units. As shown in **Table B-20**, the parcels identified in Opportunity Area 4 – Rialto Central Area Specific Plan include the specific evidence

supporting infill from Site ID numbers 124 and 191. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – Rialto Central Area Specific Plan

- **Vacant Underutilized Sites:** These sites are vacant and highly underutilized sites in the Central Area. Many of these sites are owned by the City of Rialto as a result of prior Redevelopment Agency activities. The area was once part of a designated redevelopment area, which identified areas defined as blighted. Redevelopment Agency activities in the past provided ample opportunities to redevelop existing vacant and highly utilized and blighted sites identified in the Central Area.
- **Adjacency to Services:** The Central Area sites are adjacent to several services and amenities that support lower and moderate-income housing. These uses include Downtown Rialto commercial, City Hall, US Post Office, Community Center, Adult School, Parks, Metrolink Station and numerous public transit stops. These adjacent services and facilities strongly support the needs of lower income households.

Housing units in this area would be located near existing commercial businesses, the Civic Center, and its green open spaces, as well as the Rialto Metrolink Station.

Table B-13 below displays the capacity and opportunity in this Opportunity Area to help accommodate the City's RHNA allocation. **Figure B-27** below maps the sites identified within this Opportunity Area 4 which can help accommodate a portion of the City's RHNA allocation.

Table B-13: Opportunity Area 5 – Baseline Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
14 acres	38 du/acre	189	8	153	350

Figure B-27: Opportunity Area 4 – Rialto Central Area Specific Plan

Opportunity Area 5 – Baseline Parcels

The City has identified a collection of parcels along and near Baseline Road as opportunity areas for the development of higher density housing. This general area is made up of existing residential neighborhoods, schools, and a retail center. The parcels identified as part of the Sites Analysis make up 9 acres and are currently zoned for Single-Family Residential and Multi-Family Residential. The creation of a new zoning district for this 9-acre Baseline Opportunity Area with an assumed density of 35 dwelling units per acre would facilitate the potential development of 163 housing units, including 88 housing units affordable to very low-/low-income households. **Table B-20** shows the specific evidence supporting the infill parcels identified in Opportunity Area 5 – Gateway Specific Plan. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – Baseline Parcels

- **Proximity to existing residential areas**: These sites are located adjacent to existing residential neighborhoods. Adjacency of residential uses is conducive to neighborhood enhancement and transitioning from auto-oriented retail development to residential uses. The adjacent school facilities contribute to safe routes to school and enhanced pedestrian safety.
- **Underutilized Sites:** The Baseline area consists of older, large scale retail centers that have seen significant transition. Once part of larger scale, integrated retail centers, with larger tenants, such as grocery, drug, variety and restaurants, these sites have transitioned to primarily discount retailers that are utilizing tenant spaces not designed to current uses. This has created highly underutilized parcels with parking fields far exceeding demand. Additionally, the Opportunity Area has experienced high turnover of tenants and vacancies that have increased over time. Many of the retail centers experience deferred maintenance issues. Many of the existing retail spaces are occupied by non-retail tenants, indicating a lower demand for traditional retail use.

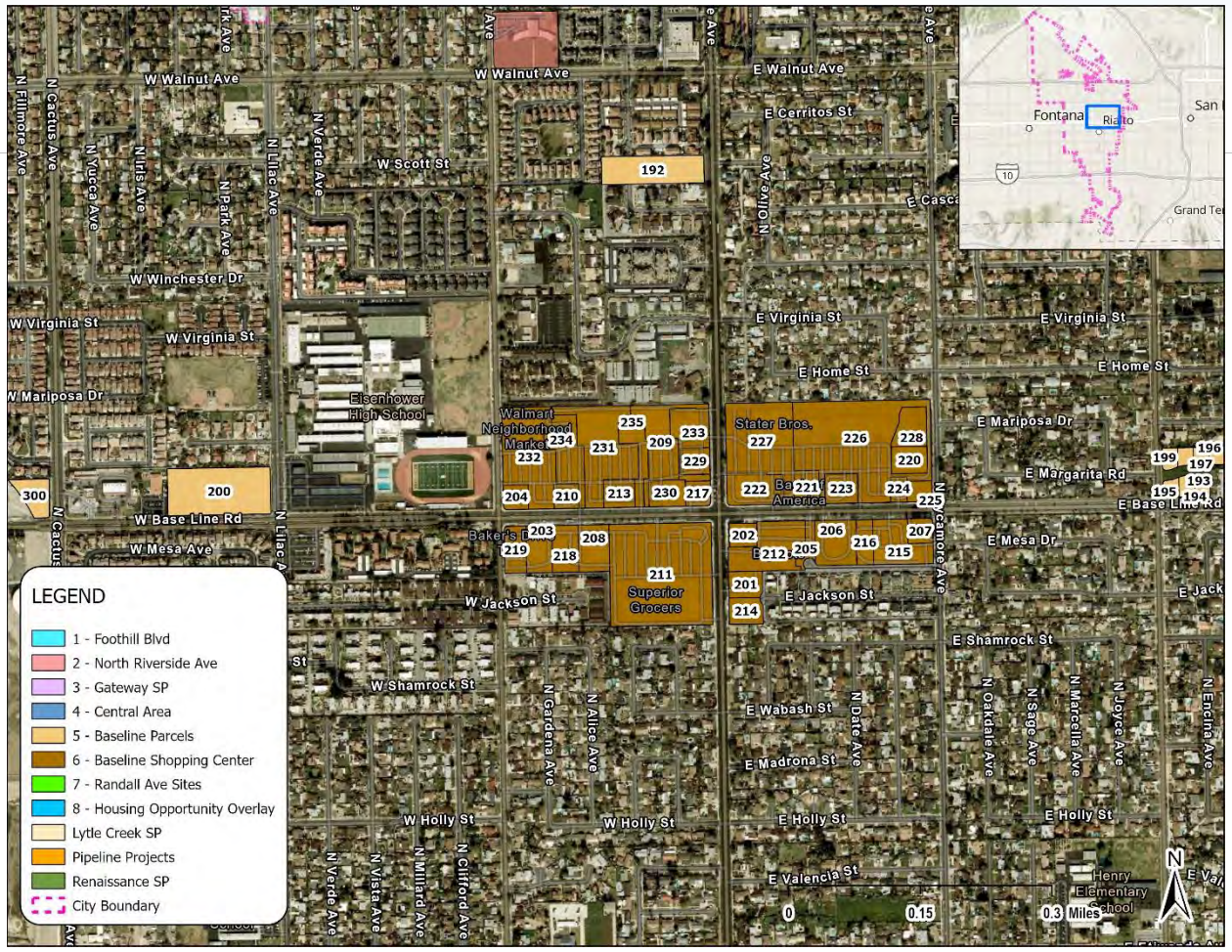
The parcels identified were deemed suitable as they are currently either partly or entirely vacant. Additionally, some of the parcels have the potential to be consolidated for residential development. The parcels identified as part of the Sites Analysis meet the criteria required by AB 1379 for sites projected to accommodate very low-/low-income units. Pending implementation, this zone could have a minimum density of 20 du/ac and a maximum of 50 du/ac.

Table B-14 below displays the capacity and opportunity in this Opportunity Area to help accommodate the City's RHNA allocation. **Figure B-28** below maps the sites identified within this Opportunity Area 5 which can help accommodate a portion of the City's RHNA allocation.

Table B-14: Opportunity Area 5 – Baseline Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
9 acres	35 du/acre	88	5	70	163

Figure B-28: Opportunity Area 5 - Baseline Parcels



Opportunity Area 6 - Baseline Shopping Center

The City has identified the Baseline Shopping Center as an opportunity to develop residential units in conjunction with the existing commercial and retail uses. The Baseline Shopping Center is located along both sides of Baseline Road and is currently zoned Community Shopping Center (C-1A). In either a mixed-use or wholly residential scenario, the creation of a new zoning district for this Opportunity Area 6 with an assumed average density of 30 dwelling units per acre would increase opportunities within the City for the development of high-density housing.

Although the parcels within the Sites Inventory have the capacity to accommodate over 2,500 units of development (at an assumed unit yield of 30 du/ac), an assumption of approximately 50% redevelopment has been applied considering existing uses on the site and economic conditions. The assumed buildout is therefore projected at 1,353 units, 744 of which are projected to develop for lower income households. As shown in **Table B-20**, the parcels identified in Opportunity Area 6 – Baseline Shopping Center includes the specifics of each site from Site ID numbers 201 and 235. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – Baseline Shopping Center

- **Underperforming Retail**: As shown in **Figure B-29**, the candidate sites are located on both sides of W Baseline Road. This area is a traditional commercial corridor with big box retail and large surface parking. The commercial districts are rather old, great need for revitalization. There are empty lots in many of these districts which indicate an underutilized parcel for its intended commercial purpose. The commercial uses on these sites include aging malls with vacant buildings or expiring leases and small single retail spaces with majority surface parking on the lot. Market trends show that consumers have generally shifted towards online shopping, reducing the need for physical stores.
- **Marginal Type of Uses:** The overabundance of parking in this area, even during peak usage, is an indication that the commercial uses are underperforming or demand for parking is significantly lower than planned. Identified parcels in this area have vacant commercial buildings and outdated commercial uses.
- **Consolidated Sites:** Majority of these sites are owned by a few property owners. There are three main entities that own the larger parcels in this Opportunity Area. The potential for consolidation of those parcels to provide sufficient buildable acreage makes it suitable for redevelopment. The three corporations that have large sites are:
    - Abbyfield Properties
    - Buena Vista DEV LLC
    - Allied Farms Inc

By incorporating housing units with existing commercial uses, the City promotes revitalization of the area and walkability between potential residential developments and shopping centers. Excepting two smaller sites which are expected to be consolidated in any potential redevelopment as they have the same owner, the parcels identified as part of the Sites Analysis for Opportunity Area 6 meet the criteria required by AB 1397 for sites with the capacity to accommodate very low-/low-income units.

Table B-15 below displays the capacity and opportunity in this Opportunity Area to help accommodate the City's RHNA allocation. **Figure B-29**below maps the sites identified within this Opportunity Area 6 which can help accommodate a portion of the City's RHNA allocation.

Table B-15: Opportunity Area 6 – Baseline Shopping Center Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
57 acres	30 du/acre	744	70	539	1,353

Figure B-29: Opportunity Area 6 - Baseline Shopping Center

Opportunity Area 7 – Housing Opportunity Overlay

The City has identified Opportunity Area 7 as having the potential for high density multiple-family housing developments. Opportunity Area 8 is located on both sides of the 210 Foothill Freeway. These sites are predominantly zoned Single Family Residential. Opportunity Area 8 sites are strategically located in two primary regions: North of the 210 Freeway, between Rialto Airport Specific Plan and Lytle Creek Ranch Specific Plan sites, and South of the 210 Freeway, near key transportation corridors and recent development areas like Foothill Boulevard, the Central Area, and the Randal Avenue Sites Opportunity Areas.

The City has identified a collection of parcels totaling 46.7 acres in the Housing Opportunity Overlay area as having potential for housing development at an increased density. The creation of this new overlay with an average assumed density of 30 dwelling units per acre, has the potential to result in 1,053 new housing units, including 583 very low-/low-income households. These parcels identified as part of the Sites Analysis are either currently vacant or have marginal uses with the potential to be redeveloped to include housing units. The identified parcels meet the criteria required by AB 1397 for sites with the capacity to

accommodate very low-/low-income units. Below is a summary of evidence supporting development in infill sites.

Evidence Supporting Development in Infill Parcels – Housing Opportunity Overlay

- **Vacant Underutilized Sites:** These sites are mostly vacant and highly underutilized sites identified through the City of Rialto. Given the marginal use of the lots and their proximity to other vacant lots, the probability of development is high.

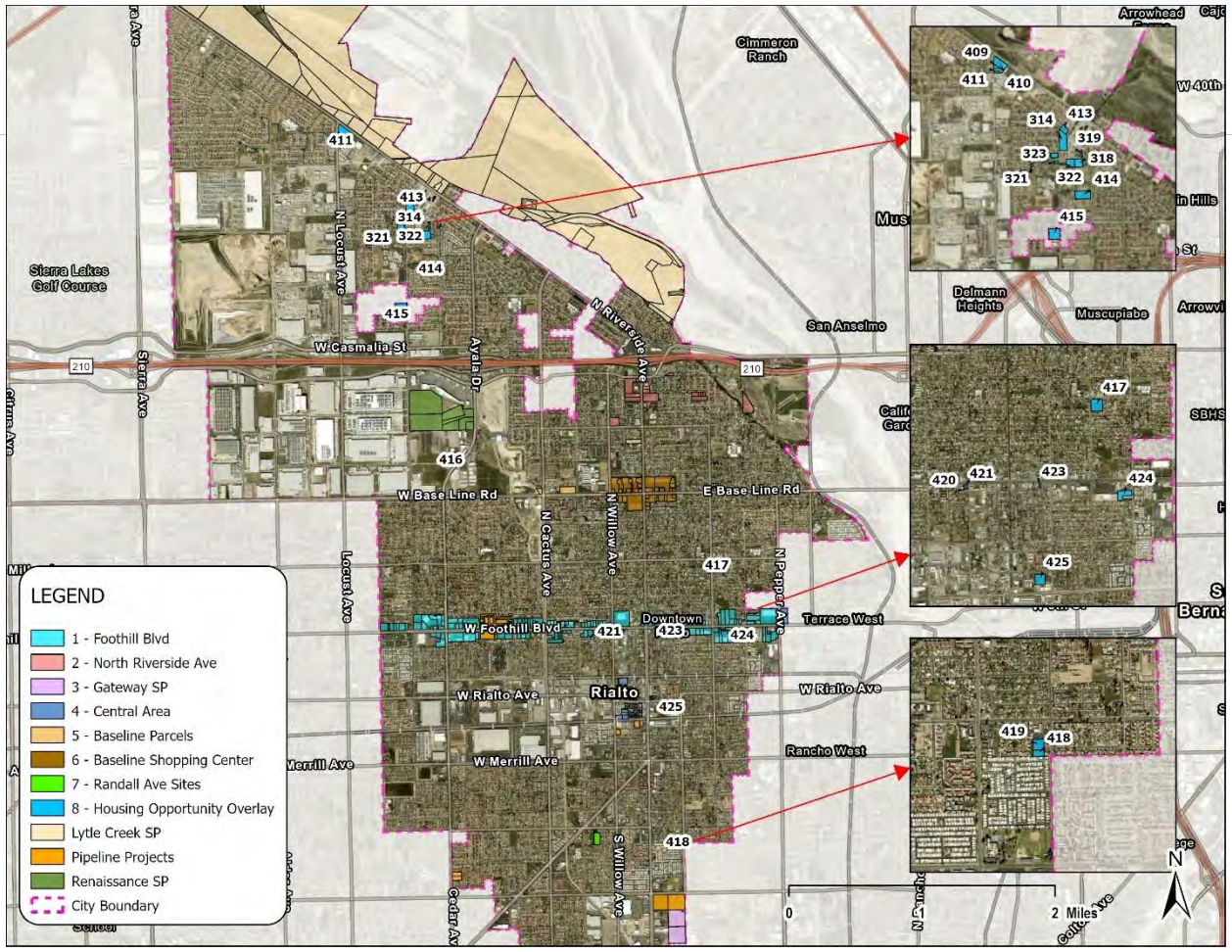
These parcels identified as part of the Sites Inventory were identified due to their vacant conditions, potential for development of housing on underutilized parcels. Additionally, these parcels were identified to be in close proximity to existing services and resources which include other existing residential developments, commercial businesses, and main traffic routes.

Table B-17 below displays the capacity and opportunity in the Housing Opportunity Area to help accommodate the City's RHNA allocation. **Figure B-31** below maps the sites identified within this Opportunity Area 8 which can help accommodate a portion of the City's RHNA allocation.

Table B-17: Opportunity Area 8 – Housing Opportunity Overlay Sites Analysis

Feasible Acreage	Assumed Density	Net Units			
		Low/Very Low	Moderate	Above Moderate	Total
46.7 acres	30 du/acre	583	50	420	1,053

Figure B-31: Opportunity Area 8 – Housing Opportunity Overlay Sites



10. Water, Sewer, and Dry Utility Availability

The City of Rialto has water, sewer, and dry utilities (gas and electric) that exist or are planned to accommodate residential development in the community. The City has the infrastructure in place which is designed and located to accommodate potential for additional housing identified for the 6th Cycle Housing Element.

11. Water and Sewer

The City of Rialto participated in the San Bernardino Valley Regional Urban Water Management Plan (2015), and it identifies the water services and sewer system distribution throughout the community. The City of Rialto relies upon local water sources. The majority of the City's water supply comes from local surface water and groundwater supplies. Three water agencies are responsible for water in the City of Rialto: The City of Rialto Department of Public Works Water Division, the West Valley Water District (WVWD), and the Fontana Water Company (FWC). The FWC is the only private investor-owned company, while the other two providers are public agencies.

The City is the sole provider of sewer system distribution for all residents in the City. All the identified sites are within areas that the City services. Wastewater in Rialto is maintained and operated by the City. The City also provides storm drains, sewer system lines, and other wastewater infrastructure to all areas within the City. The wastewater generated in Rialto flows into local pipes operated by the City of Rialto's Wastewater Treatment Plant. New development has the potential to result in increased demand for water and wastewater flows.

There are a number of unsewered, older residential properties south of Santa Ana Avenue and on the eastern and western edges of the City. The City of Rialto's sewer system is expected to continue meeting the needs of current developments in the City through the next 50 to 100 years. The City has expansion plans set within the City limits and in the Sphere of Influence to meet the needs of the community as development and population increases. The City's Urban Water Management Plan (UWMP[1]) outlines plans to accommodate for future use and plans for the maintenance and expansion of existing utility infrastructure. The City of Rialto does not have a Sewage System Management Plan.

Each site has been evaluated to ensure there is adequate access to water and sewer connections as well as dry utilities such as electric, gas, and telecommunication lines. Most sites are situated with a direct connection to a public street that has the appropriate water and sewer mains and other infrastructure to service the candidate sites.

12. Utilities

The Southern California Gas Company (SoCal Gas)[2] provides natural gas services to the City. SoCal Gas is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery (EOR) and EG customers in Southern California. Southern California Edison (SCE) provides electricity to the City. According to the California Energy Commission, SCE consumed approximately 80,912 million kilowatts per hour (kWh) of electricity in 2019. SCE continues to provide energy to the state of California through a series of methods including oil and natural gas, renewable energy resources, and alternative diverse supplies. SCE will continue to provide adequate services to Rialto, including increased household growth as projected by the City's RHNA allocation.

In accordance with the California Public Utilities Commission all electric and gas service will be provided for future development in Rialto as requested. SoCal Gas and SCE regularly partner with the City to provide services and obtain authorization to construct any required facilities. The City has a mature energy distribution system that will be able to add additional service connections for future residential land uses.

[1] San Bernardino Valley Regional. (2015). Urban Water Management Plan. Available at: https://www.yourrialto.com/DocumentCenter/View/893/2015-Urban-Water-Management-Plan-PDF?bidId=
[2] Southern California Gas Company. (2011). List of Cities and Communities Served. Available at: https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/CITIES.pdf.

B. Calculations of Unit Capacity

This section contains a description of the candidate sites' identification to meet Rialto's RHNA need at all income levels. The full list of these sites is presented in **Table B-20** through **B-22**.

1. Total Unit Calculations

Realistic Capacity Under Existing Zoning

As outlined in **Table B-1**, total unit capacity for the City was calculated on a per-parcel basis. This included capacity of existing zoned land, pipeline projects, 5th Cycle sites, accessory dwelling units and rezoning sites. Each parcel was evaluated based on its individual propensity to redevelop and site characteristics. Generally, example sites in the City and locally have met or exceeded maximum density permitted. Limiting factors may include setbacks, heights, or other development standards. The parcels that will accommodate growth have assumed full utilization of density opportunity on the Candidate Sites.

The City has assumed 80% utilization of sites to accommodate for the following factors:

- Not all development is required to build out at maximum densities, therefore, a factor was utilized to accommodate this likelihood. Since historic development has either met or exceeded permitted densities, as demonstrated by recent approved projects, a general factor or 20% was considered sufficient to accommodate individual instances where max density is not achieved. In addition, provisions in the Policy program support the maximization of residential capacity and the targeting of standards, incentives, and other methods to accommodate residential uses, especially for lower income residents.

- Application of Site Requirements (setbacks, parking, etc.) – Generally, the City has seen the maximization of density on most development projects approved. Therefore, to be conservative in estimation of site yield the City has utilized 80% assumption as a "worst case" estimate of gross versus net yield.

- Assumption that not all sites will accommodate 100% residential uses – The City's existing zoning provisions and proposed zoning code amendments will further the opportunity for housing, especially lower income housing. To that end, the City has determined that the 80% estimate of site utilization can also be applied to factor in the likelihood that not all sites that permit residential and non-residential uses will develop as residential uses. To support this assumption, the City states that the following rezones, to be completed concurrently with the adoption of the Housing Element:

    - Opportunity Area 1: Foothill Boulevard Specific Plan·159 acres and 4,437 units of capacity
    - Opportunity Area 2: North Riverside Avenue 17 acres and 673 units of capacity
    - Opportunity Area 3: Gateway Specific Plan· 20 acres and 558 units of capacity
    - Opportunity Area 4: Central Area Specific Plan· 14 acres and 350 units of capacity
    - Opportunity Area 5: Baseline Parcels· 9 acres and 163 units of capacity

- Opportunity Area 6: Baseline Shopping Center· 57 acres and 1,353 units of capacity
- Opportunity Area 7: Housing Opportunity Overlay· 46.7 acres and 1,053 units of capacity

A total of 8,272 units is needed to accommodate growth need in the Planning Period. The City has identified sites to accommodate a capacity of 16,197 units including existing zoning, pipeline projects and future rezoning. These sites provide more than a sufficient level of buffer to accommodate the likelihood that some parcels may not develop for residential uses.

Additionally, the City has also included a 96% surplus of sites above its RHNA obligation to accommodate. Should sites not be available in the future, it should be noted that the City is obligated by law to demonstrate adequate sites at all times throughout the planning period, so if there are any issues with the availability of sites resulting from use of sites for non-residential uses, the City is obligated to identify additional sites if deemed necessary. The City's annual monitoring program and APR will ensure the inventory of available sites is maintained throughout the planning period.

The 96% buffer in excess of the RHNA need was included to account for individual variations in built out densities on a per parcel basis. The lower percent assumptions are due to the likelihood that lower density product is typically single-family development and not multifamily development and therefore higher density will typically yield close to intended densities. Additionally, policies and programs have been included to further enhance the likelihood of reaching zoning capacities. Reaching the maximum densities will be supplemented with minimum density requirements. Generally, the City believes based on existing zoning standards that assumed unit yields will be equal or close to assumed permitted densities.

Rialto does not have traditional zoning density standard expressed in dwelling units/acre. Rather other standards, as expressed below, provide for the basis on assumptions for density. There is not a defined "minimum" versus "maximum" density. Therefore, it is more likely for Rialto to experience maximization of density on residential sites.

Table B-18: Rialto Development Standards - Dimensions

Zone	Minimum Dimensions		Minimum Yard Setbacks			Construction Standards		
	Lot Size	Lot Width	Front	Side	Rear	Max. Height	Max. Lot Coverage	Max. Density
A-1	1 acre	120 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	N/A	N/A
R-1	8,400 sq. ft.	80 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 A-10,000	10,000 sq. ft.	100 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 B	8,400 sq. ft.	80 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 C	7,700 sq. ft.	70 ft.	25 ft.	3-5 ft.	20 ft.	35 ft.	30%	N/A
R-1 D	10 acres	60/65 ft.	20 ft.	10 ft.	20 ft.	35 ft.	50%	6 DU/acre
R-3	1 acre	150 ft.	15 ft.	5 ft.	15 ft.	35 ft.	35%	1 DU/2,000 sq. ft.
R-4	7,200 sq. ft.	60 ft.	15 ft.	3-5 ft.	15 ft.	75 ft.	60%	1 DU/900 sq. ft.

Note: Table only reflects requirements for Zoning Districts which permit residential development.
Source: City of Rialto Zoning Code

Net unit capacity per parcel under existing zoning when evaluating 5th Cycle sites was calculated by evaluating buildable acreage, multiplying by an assumed buildout density based on zoning, and subtracting any existing units. This percentage was established by accounting for development standards such as setbacks and lot coverage. The conservative density estimate is applied to the nine 5th Cycle sites provided in **Table B-20** – this is not reflected as a decrease in the buildable acreage but is included in the potential unit calculations. As such, the gross acreage and buildable acreage may remain the same, but potential unit calculations incorporate the lower, 80% density estimate. Potential constraints to the full redevelopment of the parcel, to the extent they are known, such as environmentally sensitive areas, were considered and deductions were made where those factors decreased the net buildable area of a parcel. For example, if a parcel contained a large slope on one side, the buildable acreage was assumed at 50% of the gross parcel acreage. These constraints are reflected in the buildable acreage column in **Tables B-20**.

To account for potential development of non-residential uses in residential zones, specifically for lower income uses, all future capacity except for ADU's is to be accommodated on rezoned sites. Provisions in the rezone program will address residential requirements on sites to accommodate RHNA and are assumed to provide the sufficient level of surety that mixed use sites identified for the purposes of RHNA will maximize their potential for residential use. Therefore, residential capacity was assumed as maximum assumption based on the minimum density standards to be assigned to each rezone site. To accommodate any individual discrepancies on a site-by-site basis, a 97% buffer above RHNA was added, with 39% of that buffer for lower income has been added ensure a sufficient level of sites.

Realistic Capacity Under Rezoning Strategies

Each of the seven identified Opportunity Areas has been allocated an assumed density based on its rezone strategy. Six of the seven Opportunity Areas include a redevelopment percentage of 50-80%. As part of **Section 4: Housing Plan**, the City has included programs to establish minimum and maximum densities and development standards associated with each redevelopment strategy. These will be developed in accordance with the assumed density and redevelopment assumptions established in this 2021-2029 Housing Element.

Table B-19 shows projects in and around the City of Rialto that have developed at, above, or near the assumed density with affordability components. These examples show a local history of developing under these conditions. While only one project listed is located within the City of Rialto, the remaining projects in the City of Fontana are closely located to Rialto and can be considered part of the same local market.

In addition, programs are included in **Section 4** to incentivize residential development, including:

- Program 2B requires at least 50 percent residential use of the total floor area of mixed-use projects.
- Program 2R provides incentives for the development of residential uses on candidate sites which may also permit nonresidential uses.
- Program 4B to remove constraints from development standards.

Table B-19: Example Projects for Density Assumptions				
Zone	Maximum Density	Example Project	Project Description	Project Density
City of Rialto				
Rialto Central Area Specific Plan – Commercial Support	N/A	Rialto Metrolink South	Rialto Metrolink South includes 100% development of 55 deed-restricted units affordable to very low-income households.	Approx. 44 DU/AC
R-X	112 DU/AC	TELACU II	70-unit senior development.	70 DU/AC
R-3	74 DU/AC	TELACU III	100% affordable senior development with 75 units.	75 DU/AC
City of Fontana				
R-5	50 DU/AC	18-063 Downtown Mixed Use	29-unit multifamily project.	54 DU/AC
FBC	31.2 DU/AC	Sierra Fountains Apartments	100% affordable development of 60 units.	25.5 DU/AC
FBC	31.2 DU/AC	Fountains at Sierra	100% affordable development of 93 units.	34.4 DU/AC
FBC	31.2 DU/AC	Rosena Fountains	100% affordable development of 69 units.	15.8 DU/AC
FBC	31.2 DU/AC	John Piazza Senior Apartments	100% affordable development of 60 units.	36 DU/AC
FBC	31.2 DU/AC	Minerva Manor	100% affordable development of 87 units.	29.8 DU/AC
FBC	31.2 DU/AC	0240-031-17 & -19	91-unit senior apartment complex.	38.9 DU/AC
FBC	31.2 DU/AC	Paseo Verde (I, II, III)	100% affordable development of 184 units.	13 DU/AC
FBC	31.2 DU/AC	9233 Cypress Ave	14-unit apartment complex.	32.18 DU/AC
FBC	31.2 DU/AC	Gardens at Sierra	100% affordable development of 93 units.	28.18 DU/AC
FBC	31.2 DU/AC	Plaza at Sierra Senior Apartments	100% affordable development of 90 units.	23.56 DU/AC
FBC	31.2 DU/AC	Village at Sierra Senior Apartments	100% affordable development of 108 units.	38.03 DU/AC

The Baseline Shopping Center (Opportunity Area 6) includes a 50% redevelopment percentage. The Opportunity Area is established to facilitate mixed-use development of commercial and retail uses in conjunction with residential uses. As part of the **Section 4: Housing Plan**, the City has also included

programs to establish minimum and maximum densities and development standards associated with the Baseline Shopping Center rezoning strategy.

2. Affordability Calculation

All the sites within the inventory with a capacity to accommodate very low-/low-income units meet the criteria set forth by AB 1397 (or have specific justification for their inclusion). As an additional strategy to create adequate capacity for the development of lower income units, the City assumes only a portion of (approximately half) of the full capacity of each of these sites will develop affordably.

Finally, Rialto recognizes that not all sites within the inventory will develop such that they meet the exact affordability assumptions identified within this appendix. For example, some sites may develop at higher density or affordability levels through the use of density bonus incentives, and some may develop with majority market rate units (units affordable to the moderate and above moderate-income households). For this reason, the City has included a buffer of 39% (1,339 units) on the total number of very low and low-income units to assist in accommodating potential differences in future housing development. There is also an overall buffer of 96% (7,925 units), averaged over all income categories, of capacity built into the inventory.

The City has established goals, policies, and programs within the Housing Element (**Section 4: Housing Plan**) aimed at identifying funding opportunities and partnering with the development community to increase the amount of affordable housing built in future developments. The City recognizes that should a "No Net Loss" situation occur, they will be required to identify additional sites.

C. Demonstrated Adequacy of the Sites Inventory to Meet RHNA

Rialto's sites inventory demonstrates adequate, realistic capacity to accommodate the City's 6th-Cycle RHNA through a blend of vacant parcels, underutilized strip-commercial centers, oversized parking fields, and corridor lots that readily convert to housing. The Housing Plan documents a broad strategy to address housing needs paired with targeted rezones to meet lower- and moderate-income needs; together these strategies address the City's 8,272-unit RHNA with headroom and monitoring to maintain capacity over the planning period. Programs 2A (Adequate Sites) and 2B (Rezone) are the backbone of this approach, supported by annual tracking and incentives so mixed-use and dual-use parcels deliver their assumed residential yields.

Appendix B's narrative and case studies show why these parcels are feasible: they consistently exhibit the same attributes that have already produced housing locally and regionally—excess parking, low coverage, aging improvements, corridor adjacency, and strong access to services—and the City layers on enabling programs to remove friction. Small lots are addressed explicitly under Programs 2O/2P (Lot & Small-Lot Consolidation); large sites are paired with subdivision tools; and corridor parcels benefit from Program 4B (Remove Development Constraints) and Program 3H (AB 2097 Parking Near Transit) to right-size standards and parking where eligible. Comparable outcomes such as Howard & Irene Levine Senior Community (Los Angeles), Whittier Park Place/Catalina (Whittier), and The Mark and Mission Heritage Plaza (Riverside)

mirror the same transition from surplus asphalt and marginal commercial to context-sensitive multifamily, underscoring that Table B-20's sites are not speculative but grounded in precedent and program support.

D. Sites Inventory

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
1 – Foothill Boulevard Specific Plan																			
1	012758240	N/A	PATEL, DAYALJI R TR	Specific Plan	Commercial – Pedestrian	0.52	0.52	0	No	No	Yes	Yes	1 unit	35	14	8	1	5	This parcel is a vacant infill lot situated between an active motel and a beauty salon, with established single-family residential to the rear. Its dual frontage and transitional location provide strong redevelopment feasibility. At 0.52 buildable acres, the site meets HCD sizing criteria and can accommodate an estimated 14 units at 35 du/ac (8 lower-income). Its compact scale favors townhome or stacked-flat formats with podium or surface parking. Redevelopment is supported by Programs 2B (Rezoning) and 2R (Residential Incentives). The parcel's adjacency to services, transit, and established neighborhoods parallels successful infill case studies such as Nuevo Apartments in Pomona, where small vacant pads transitioned to efficient multifamily housing.
2	012836120	N/A	SHENG FAMILY LIVING TRUST (7-5-00)	Specific Plan	Commercial – Pedestrian	1.15	1.15	0	No	No	Yes	Yes	13	35	32	18	2	12	Currently a vacant lot contiguous with multiple other undeveloped parcels, this site has strong assembly potential. Residential neighborhoods directly behind the property improve compatibility for housing. At 1.15 acres, redevelopment at 35 du/ac yields approximately 32 units (18 lower-income), with additional upside if combined with neighboring vacant parcels. The absence of existing structures eliminates demolition costs and enables efficient site planning. At this size, the parcel achieves a delivery scale favored by lenders and builders,

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			improving cost efficiency and supporting inclusion of shared amenities. Supported by Programs 2O/2P (Lot Consolidation) and 4B (Remove Constraints), the parcel is positioned for multifamily or small-scale mixed-use. Regional precedents such as The Plaza at Sierra (Fontana) show the viability of clustered vacant pads redeveloped into medium-density housing.
3	012836123	N/A	TUDOR, MARION P & CHERYL G TRS	Specific Plan	Commercial – Pedestrian	1.44	1.44	0	No	No	Yes	Yes	13	35	40	22	2	16	This corner parcel is vacant but prominently located with Foothill Boulevard frontage and visibility from intersecting streets. Surrounded by other vacant lots and adjacent residential, it provides strong conditions for a gateway housing site. With 1.44 buildable acres, the parcel supports 40 units at 35 du/ac (22 lower-income). The corner orientation allows for ground-floor activation or live/work spaces, consistent with the Foothill Boulevard Specific Plan's mixed-use vision. Its acreage is large enough to support a delivery scale lenders and builders view as cost-efficient, ensuring realistic delivery feasibility. Programs 2B (Rezoning) and 2H (SB 35 Streamlining) enhance development prospects, while case studies such as Whittier Park Place (Whittier) show how underutilized corner parcels can be repositioned into vibrant multifamily communities.
4	012806150	1281 W FOOTHILL BLVD	DARVISH INVESTMENT GROUP LLC	Specific Plan	Commercial – Pedestrian	5.26	5.26	0	No	No	No	Yes	30	35	147	81	7	59	The parcel contains a retail strip center with expansive, underutilized surface parking. Declining corridor retail activity underscore its redevelopment potential. At 5.26 acres, this is one of the larger parcels in the Foothill

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Boulevard corridor, capable of supporting 147 units (81 lower-income) at 35 du/ac. Its size is attractive to developers, representing a delivery scale that lenders and builders favor for achieving economies of scale and cost efficiency. This capacity allows for full-block multifamily layouts with internal circulation, shared amenities, and structured or wrapped parking. Redevelopment is reinforced by Programs 2B, 2R, and 4B. Comparable projects such as The Mark Apartments in Riverside demonstrate how strip-commercial formats can be successfully repositioned as higher-density residential.
5	012807129	913 W FOOTHILL BLVD	FVSC LLC	Specific Plan	Commercial – Mixed Use	2.06	2.06	0	No	No	No	Yes	21	35	57	31	3	23	This site is an aging commercial property with a shallow building footprint and significant surplus parking, currently underutilized relative to its corridor location. With 2.06 acres, redevelopment at 35 du/ac yields 57 units (31 lower-income). The lot's manageable size makes it well-suited for podium-style multifamily or small-block mixed-use housing, and it is just large enough to meet a delivery scale that builders consider cost-efficient. Its mid-corridor location allows phasing without displacing stronger-performing retail nodes. Redevelopment is supported by Programs 2B and 2R. Case studies like Sierra Fountains Apartments (Fontana) highlight how modest commercial parcels with excess parking can be converted into housing that contributes to corridor revitalization

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			while maintaining walkable neighborhood services.
6	024316104	1536 W FOOTHILL BLVD	PATEL, MUKUND C	Specific Plan	Residential – Mixed Use	0.73	0.73	0	No	No	No	Yes	1 unit	35	20	11	1	8	This parcel is developed with an older hospitality use on a modest footprint, with low site coverage and large portions of paved area. The age and condition of improvements, combined with a corridor location, point toward limited long-term viability for lodging. At 0.73 buildable acres, the site supports 20 units at 35 du/ac (11 lower-income). The compact size favors three-story stacked flats or townhome-style multifamily with shared parking and open space. While modest in scale, the parcel's simplicity of reuse improves delivery feasibility, especially when paired with adjacent sites. Redevelopment is supported by Programs 2B, 2R, and 4B. Comparable transitions, including motel-to-housing projects in San Bernardino County, demonstrate realistic potential for repositioning aging hospitality uses into multifamily housing.
7	013006125	519 E FOOTHILL BLVD	EL KAIROS GROUP LLC	Specific Plan	Commercial – Pedestrian	4.12	4.12	0	No	No	No	Yes	30	35	115	63	6	46	The site contains a low-intensity retail strip with shallow commercial pads and expansive parking fields. More than half the parcel is paved, creating a highly underutilized condition. At 4.12 acres, the property has the scale to support 115 units at 35 du/ac (63 lower-income) in a block layout with internal drives, podium parking, and community amenities. The acreage is at a delivery scale favored by lenders and builders, improving cost efficiency and supporting robust amenity programming. Corridor frontage and adjacency to both residential and services strengthen feasibility.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Redevelopment is reinforced by Programs 2B and 2R, with Program 4B removing regulatory barriers. Case studies such as Paloma at Main Place Mall (Orange) show how oversized parking fields can be redeveloped into multifamily housing while retaining limited retail.
8	013006118	631 E FOOTHILL BLVD	GUITERREZ, ANGELICA	Specific Plan	Commercial – Mixed Use	0.85	0.85	0	No	No	No	Yes	1 unit	35	23	13	1	9	Currently developed with a small auto-oriented use (likely fueling or light service), this parcel is characterized by very low building coverage and high proportions of paved lot. These conditions create a prime opportunity for reuse. At 0.85 acres, the site can support 23 units at 35 du/ac (13 lower-income). Its location within a corridor of transitioning uses further strengthens redevelopment potential. The lot size sits just at the threshold of what builders consider cost-efficient, supporting compact prototypes such as podium apartments or townhomes with structured parking. The parcel benefits from Programs 2B, 2R, and 4B, as well as state incentives for transitioning auto-oriented parcels. Precedents such as Whittier Park Place (Whittier), built on a former dealership, demonstrate market feasibility.
9	013317123	612 E FOOTHILL BLVD	CHRZANOWSKI TRUST 5-12-10	Specific Plan	Residential – Mixed Use	0.99	0.99	0	No	No	No	Yes	1 unit	35	27	15	1	11	This parcel contains an older auto-service use with minimal structural improvements and a significant portion of lot area dedicated to parking and circulation. The underbuilt condition creates strong redevelopment potential consistent with corridor objectives. At 0.99 acres, the site supports 27 units at 35 du/ac (15 lower-income). Its near one-acre size

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			positions it at the threshold of delivery scales lenders and builders view as viable for cost-efficient housing, particularly when paired with corridor frontage and visibility. Its corner placement and adjacency to other commercial pads provide compatibility with phased redevelopment. Programs 2B, 2R, and 4B ensure rezoning support and incentives for intensification. Comparable projects, including former auto-service conversions in Whittier, illustrate the potential to transition into multifamily housing while maintaining corridor activity.
10	024316105	1568 W FOOTHILL BLVD	KIMO INVESTMENT CORP	Specific Plan	Residential – Mixed Use	1.65	1.65	0	No	No	No	Yes	13	35	46	25	2	19	This parcel contains an older auto-service use with minimal structural improvements and a significant portion of lot area dedicated to parking and circulation. The underbuilt condition creates strong redevelopment potential consistent with corridor objectives. At 1.65 acres, the site supports46 units at 35 du/ac (25 lower-income). Its over one-acre size positions it at the delivery scales lenders and builders view as viable for cost-efficient housing, particularly when paired with corridor frontage and visibility. Its corner placement and adjacency to other commercial pads provide compatibility with phased redevelopment. Programs 2B, 2R, and 4B ensure rezoning support and incentives for intensification. Comparable projects, including former auto-service conversions in Whittier, illustrate the potential to transition into multifamily housing while maintaining corridor activity.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
11	013339107	850 E FOOTHILL BLVD	SHL ASSOCIATES LTD	Specific Plan	Commercial – Pedestrian	9.95	9.95	0	No	No	No	Yes	30	35	278	153	14	111	At nearly 10 buildable acres, this County health-services campus functions like a low-coverage office pad with wide-open parking fields—precisely the kind of underutilization that lends itself to a full block-plan residential concept. At 35 du/ac, the site accommodates 278 homes (153 lower-income). Given its scale, a wrapped or podium format with internal drives, courtyards, and amenity clusters is realistic and cost-efficient at delivery. Proximity to neighborhood services and established residential to the rear improves absorption and compatibility. Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives) to prioritize full residential yield on mixed-use/dual-use corridors, with Program 4B (Remove Development Constraints) addressing parking and design standards; where applicable, Program 3H (AB 2097 Parking Near Transit) can further right-size parking. Comparable outcomes are documented in Appendix B: auto-oriented and office/parking conversions such as Whittier Park Place/Catalina and Mission Heritage Plaza that leveraged rezoning and incentives to transition surplus lots to multifamily.
12	013001336	523 W FOOTHILL BLVD	OMAN, GILDA L	Specific Plan	Commercial – Mixed Use	0.51	0.51	0	Yes	No	No	Yes	1 unit	35	14	8	1	5	A marginal, small-footprint auto/commercial pad with broad curb cuts and a sea of pavement is classic first-generation corridor fabric—lots of asphalt, not much building. The geometry makes a straightforward pivot to housing: pull a clean street

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			edge with stoops or a small shopfront, internalize parking, and add a landscaped forecourt that calms traffic and frames the entry sequence. Adjacent neighborhood retail and nearby single-family homes make the use transition intuitive; by consolidating driveways and creating active frontages, the project would quiet turning movements, add "eyes on the street," and knit a missing piece of the Foothill streetwall. At 35 du/ac, the site accommodates 14 homes (8 lower-income). Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) set the entitlement and financial scaffold for intensification, while 4B (Remove Development Constraints) targets setbacks, coverage, and parking ratios that can choke production on compact pads; where applicable, 3H (AB 2097 Parking Near Transit) further right-sizes stalls to demand. Comparable conversions such as Whittier Park Place (Whittier) and Nuevo Apartments (Pomona) show how shallow auto pads transition to efficient stacked-flat or podium-lite housing while maintaining an active corridor edge.
13	013317125	644 E FOOTHILL BLVD	CHRZANOWSKI TRUST 5/12/10	Specific Plan	Residential – Mixed Use	0.51	0.51	0	No	No	No	Yes	1 unit	35	14	8	1	5	A small corner/mid-block storefront with a disproportionately large apron telegraphs underbuilt conditions and strong "address value" for a neighborhood-scaled apartment house. A compact, 3–4 story elevator-served building can wrap podium or tuck parking behind liner units, with a visible entry plaza to "bookend" the block and improve pedestrian

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			continuity. Flanked by small-format shops and homes, the site can act as a corner-maker—filling a gap in the streetwall, smoothing drive access conflicts, and extending shade trees/lighting so the walking environment feels continuous between nodes. At 35 du/ac, the site accommodates 14 homes (8 lower-income). Programs 2B and 2R prioritize residential yield; 4B cleans up dimensional friction that suppresses net units on shallow lots; 3H can moderate minimum parking if transit criteria are met. The playbook mirrors Catalina Apartments (Whittier) and the Howard & Irene Levine Senior Community (Los Angeles)—both demonstrate that small pads with strong frontage can deliver durable, well-leased multifamily when the parking field is repurposed as open space and homes.
14	012806143	1325 W FOOTHILL BLVD	ALI OIL LLC	Specific Plan	Commercial – Pedestrian	1.00	1.00	0	No	No	No	Yes	13	35	28	15	1	12	A legacy fueling/car-wash configuration with heavy paving, multiple curb cuts, and modest improvements is a textbook candidate for reinvestment. The site can be re-platted to a single, controlled access point, internalized stall counts, and a U-shaped or bar-and-court massing that orients windows and balconies to a protected interior green. The surrounding mix of small retail pads and nearby residential benefits from closing extra curb cuts (safer crossings), introducing new street trees, and replacing queuing lanes with a calmer frontage—incrementally taming the corridor and improving walkability. At 35 du/ac, the site

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			accommodates 28 homes (15 lower-income). 2B (rezoning) and 2R (incentives) firm up the residential path; 4B addresses bulk, height, and parking to protect feasibility; 3H trims parking near transit where eligible. Regionally, auto-oriented pads have transitioned successfully to housing along similar arterials—see Whittier Park Place (Whittier) and Sierra Fountains Apartments (Fontana)—with upgraded public realm and modern stormwater/EV readiness typical of new multifamily.
15	013317127	660 E FOOTHILL BLVD	GOLDEN STAR HOLDINGS LLC	Specific Plan	Residential – Mixed Use	0.66	0.66	0	No	No	No	Yes	1 unit	35	18	10	1	7	A drive-through car-wash and partially vacant frontage leave more than half the site devoted to circulation—high land value trapped in asphalt. A compact podium or stacked-flat prototype with a single loaded drive aisle, screened parking, and an address court can flip the site to housing while respecting adjacent residential. Replacing queuing and spray bays with housing eliminates conflict-heavy turns, shortens pedestrian crossings, and brings porch/lobby activity to the sidewalk—complementing neighborhood retail and providing a softer edge to homes behind. At 35 du/ac, the site accommodates 18 homes (10 lower-income). Programs 2B/2R underwrite the land-use shift and close feasibility gaps; 4B provides targeted relief (e.g., setbacks/height transitions) common to small-pad infill; 3H may reduce required stalls if within a qualifying transit radius. Comparable outcomes—Whittier Park Place (Whittier) and Nuevo Apartments (Pomona)—validate lender comfort

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			and market absorption for compact corridor apartments at this intensity.
16	012808144	851 W FOOTHILL BLVD	ARTEAGA-HERNANDEZ TRUST 07/18/15	Specific Plan	Commercial – Mixed Use	1.26	1.26	0	No	No	No	Yes	13	35	35	19	2	14	A medical office with broad parking aprons and a single-purpose building suggests low long-term productivity for the parcel relative to its frontage. Housing can reclaim depth via a double-loaded bar over podium with two courtyards—one active (pool/fitness) and one quiet (shade grove), plus a mid-block paseo to stitch the site into the corridor. Proximity to clinics, services, and daily needs creates a natural "live-near-work/errands" pattern; adding residents along this segment will support small businesses, bolster off-peak activity, and improve passive surveillance on Foothill. At 35 du/ac, the site accommodates 35 homes (19 lower-income). Feasibility is strengthened by 2B (locking in multifamily capacity) and 2R (incentives), while 4B removes code friction and 3H can right-size parking near transit. The transition from low-coverage medical/office to multifamily parallels The Mark Apartments (Riverside) and Mission Heritage Plaza (Riverside)—both demonstrate that structured or pooled parking and internalized open space make corridor living competitive.
17	024316106	1590 W FOOTHILL BLVD	VILLEGAS, ROBERTO	Specific Plan	Residential – Mixed Use	0.72	0.72	0	No	No	No	Yes	1 unit	35	20	11	1	8	Older vacant structure with near constant turnover, generous paving, and residential behind the corridor create friendly edges for a housing pivot with minimal demolition complexity. A three-story stacked-flat or podium-lite building with a protected interior court provides

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			acoustical relief from Foothill and a gracious neighborhood transition at the rear. The adjacency to existing homes means the project can add a landscaped buffer and a mid-block connection, while along Foothill it completes the streetwall and broadens the mix of customers for nearby shops—incremental but meaningful corridor repair. At 35 du/ac, the site accommodates 20 homes (11 lower-income). 2B and 2R deliver entitlement certainty and incentives; 4B simplifies dimensional standards that burden small infill; 3H reduces minimum parking where transit access applies. This is the same redevelopment logic used at Paloma at MainPlace Mall (Orange) and The Plaza at Sierra (Fontana)—reclaim surplus stalls, internalize drives, and return the street edge to people.
18	013001346	661 W FOOTHILL BLVD	MATT C INVESTMENTS LLC	Specific Plan	Commercial – Mixed Use	1.38	1.38	0	No	No	No	Yes	13	35	38	21	2	15	A self-service car-wash and circulation-heavy layout occupy a larger-than-typical pad for the corridor, making re-planning efficient. Convert multiple drive aisles into a connected internal loop, place a podium/garage at the center of mass, and wrap homes around courtyards so the street reads residential rather than auto-oriented. Adjacent commercial and residential uses both benefit: removing redundant curb cuts reduces conflict points, new sidewalks/lighting and bio-retention planters upgrade the public realm, and on-site stormwater capture improves corridor drainage performance. At 35 du/ac, the site accommodates 38 homes (21 lower-income). 2B/2R formalize the residential transition; 4B

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			addresses bulk/parking limits that can erode yield; 3H can remove minimums near transit. The site condition and delivery mechanics echo Sierra Fountains Apartments (Fontana) and Whittier Park Place (Whittier)—auto-legacy parcels rebalanced into mid-density apartments with strong leasing performance.
19	013046101	805 E FOOTHILL	ST PAUL FAMILY MINISTRIES	Specific Plan	Commercial – Pedestrian	1.38	1.38	0	No	No	No	Yes	13	35	38	21	2	15	A faith-based/institutional parcel with a modest building and large surplus parking lot offers a low-conflict path to add housing while retaining community-serving space. A courtyard or double-bar building can integrate shared rooms (youth/classroom, multipurpose) at the ground level while elevating homes above, with discrete, shared or structured parking. Located near single-family neighborhoods and civic uses, the program can co-locate community services and housing, add lighting/landscaping to currently dark lots, and create safe, direct pedestrian links—strengthening both the congregation and the corridor. At 35 du/ac, the site accommodates 38 homes (21 lower-income). Programs 2B and 2R support a dual-use evolution; 4B ensures standards (setbacks/height/parking) match the mixed mission; and state policies for faith-based housing complement local tools. Mission Heritage Plaza (Riverside) is the apt precedent—integrating civic/community functions with affordable and workforce apartments on a downtown-adjacent parcel.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
20	013006113	681 E FOOTHILL BLVD	JANESS ASSOCIATES	Specific Plan	Commercial – Mixed Use	0.83	0.83	0	No	No	No	Yes	1 unit	35	23	13	1	9	A mid-corridor retail pad with an outsized surface lot presents an uncomplicated re-striping and re-massing opportunity: hold a strong streetwall with liner units or small shopfronts, tuck parking behind, and connect to the block with a mid-block paseo. The proportions support an efficient, elevator-served stacked-flat building with a central amenity court and limited structured parking—right-sized to the market while protecting yield. Surrounded by daily-needs retail and close to established homes, the infill would extend a walkable edge, shorten trips for residents, add lighting and trees to currently exposed asphalt, and provide more "eyes on the street" for corridor safety. At 35 du/ac, the site accommodates 23 homes (13 lower-income). Programs 2B (Rezoning) and 2R (Residential Incentives) provide the capacity and concessions to pivot from single-use retail; 4B (Remove Development Constraints) reduces code frictions that add soft costs; 3H (AB 2097 Parking Near Transit) allows calibrated stall counts where eligible. The redevelopment template aligns with The Mark Apartments (Riverside) and Nuevo Apartments (Pomona)—both are instructive examples of turning surplus parking into well-amenitized multifamily while preserving a walkable corridor edge.
21	012857120	1280 W FOOTHILL BLVD	ELECO LLC	Specific Plan	Commercial – Pedestrian	1.86	1.86	0	No	No	No	Yes	13	35	52	29	3	20	A low-coverage commercial pad with oversized surface parking, this 1.86-acre parcel operates far below its land potential, creating a clean path to a residential block plan with internal

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			circulation and shared open space. At 35 du/ac, the site accommodates 52 homes (29 lower-income). Given its near-two-acre scale, a three-to-four-story podium or wrap with tuck-under parking can be right-sized to corridor demand while meeting lenders' efficiency thresholds. Programs 2B (Rezoning), 2R (Residential Incentives), and 4B (Remove Constraints) directly improve feasibility, and AB 2097 implementation via Program 3H helps right-size parking near transit, further unlocking build area. Patterns match Paloma at Main Place Mall (parking-field infill) and Mark Apartments in Riverside (strip-commercial conversion), where underutilized lots were successfully transitioned into multifamily while compatible commercial uses persisted.
22	012801145	1332 W FOOTHILL BLVD	SEBANC, ALLAN & BEVERLY FAMILY TRUST	Specific Plan	Commercial – Pedestrian	1.88	1.88	0	No	No	No	Yes	13	35	52	29	3	20	Similar to nearby corridor pads, this 1.88-acre site is dominated by asphalt, not buildings, indicating strong residual land value and a clear redevelopment path. At 35 du/ac, the site accommodates 52 homes (29 lower-income). A compact courtyard or U-shaped podium with an internal drive can buffer the corridor while orienting homes to landscaped common space; delivery scale is large enough to support amenities without overcapitalizing. Programs 2B and 2R align entitlements and incentives; Program 4B addresses dimensional and parking constraints that often suppress net yield on mid-sized pads. The site's condition mirrors Paloma's parking-lot infill model—converting surplus stalls into housing—and Mark Apartments'

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			transition from strip-commercial to residential.
23	013006120	505 E FOOTHILL BLVD	CHIANG, GRACE TRUST 5-3-90	Specific Plan	Commercial – Pedestrian	2.00	2.00	0	No	No	No	Yes	13	35	55	30	3	22	Two gross acres with shallow commercial improvements and heavy paving provide the bones for a neighborhood-scaled residential infill concept that can phase with any interim retail operations. At 35 du/ac, the site accommodates 55 homes (30 lower-income). A center-amenity scheme (pool, tot lot, clubhouse) fits comfortably here, with podium or podium-lite parking improving site efficiency along the boulevard. Programs 2B/2R reduce entitlement friction and improve economics; Program 4B ensures development standards won't cap density below the assumed yield. This playbook has worked for parking-field sites like Paloma and for Rialto-area cases where older retail has yielded to housing without harming corridor vitality.
24	012806144	1321 W FOOTHILL BLVD	99 CENTS ONLY STORES LLC	Specific Plan	Commercial – Pedestrian	2.43	2.43	0	No	No	No	Yes	21	35	68	37	3	28	An aging single-tenant discount retailer sits within an expansive parking field on 2.43 acres, creating a classic surplus-facilities condition for housing. At 35 du/ac, the site accommodates 68 homes (37 lower-income). The acreage supports a wrapped building with internalized parking and perimeter stoops for an improved street edge; alternating courtyard and paseo connections strengthen walkability to adjacent services. Programs 2B and 2R enable the residential pivot; Program 4B and Program 3H (AB 2097 parking near transit) help right-size parking and heighten feasibility. The site's configuration closely tracks Paloma's

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			parking-lot redevelopment logic and the Mark Apartments' repositioning of strip-commercial land into efficient multifamily.
25	013006123	571 E FOOTHILL BLVD	JOHN & SONS LLC	Specific Plan	Commercial – Pedestrian	2.53	2.53	0	No	No	No	Yes	21	35	70	39	4	27	With 2.53 acres and a single low-intensity commercial user, more than half the site is functionally idle. At 35 du/ac, the site accommodates 70 homes (39 lower-income). The footprint is ideal for a podium with two courtyards—one active, one quiet—plus a linear paseo to stitch into the block network. Programs 2B/2R provide the regulatory path and incentives to move from single-use retail to housing; Program 4B ensures dimensional standards won't erode capacity. Comparable transitions—from Paloma's repurposed parking to Fontana's Sierra Fountains—show how modest commercial parcels convert to efficient, amenitized multifamily.
26	012806129	1175 W FOOTHILL BLVD	FOOTHILL BLVD PROPERTY LLC	Specific Plan	Residential – Mixed Use	4.05	4.05	0	No	No	No	Yes	30	35	113	62	6	45	A County social-services building with a large, underutilized parking field occupies this 4.05-acre parcel, presenting multiple pathways: phased joint development, structured parking with wrap, or full repositioning. At 35 du/ac, the site accommodates 113 homes (62 lower-income). Scale is advantageous—two building bars with internal drives can deliver lender-friendly efficiency and a robust amenity stack. Programs 2B and 2R support a public-to-residential pivot; Program 4B addresses bulk/parking standards; Program 3H (AB 2097) enables reduced parking ratios near transit. The feasibility mirrors the Mark Apartments' conversion of strip-commercial asphalt into housing and

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Mission Heritage Plaza's repositioning of a service/institutional site into workforce housing.
27	012801137	1410 W FOOTHILL BLVD	GBG PROPERTIES TWO LLC	Specific Plan	Commercial – Pedestrian	4.77	4.77	0	No	No	No	Yes	30	35	133	73	7	53	This 4.77-acre center with a single commercial use and extensive paving is primed for a full block-plan: wrapped or podium buildings, internalized parking, and paseo links to Foothill frontage. At 35 du/ac, the site accommodates 133 homes (73 lower-income). Delivery at this scale reaches economies of construction and supports on-site services (leasing, co-work, youth/fitness). Programs 2B and 2R streamline entitlement and improve project economics; Program 4B removes code friction that can suppress buildout on deep parcels. Analogues include Paloma's former parking fields and the Mark Apartments' retail-to-residential shift.
28	012759139	250 W FOOTHILL BLVD	BARON PACIFIC LP	Specific Plan	Commercial – Pedestrian	8.04	8.04	0	No	No	No	Yes	30	35	225	124	11	90	One of the corridor's largest underbuilt sites (8.04 acres) with a single commercial use and vast surplus parking—an optimal canvas for a multi-phase neighborhood that can include wrapped buildings, liner townhomes, and a central green. At 35 du/ac, the site accommodates 225 homes (124 lower-income). The acreage comfortably hits the builder scale lenders favor, supporting structured parking, robust amenities, and phased delivery that preserves street activation during buildout. Programs 2B and 2R, paired with Program 4B, align entitlements and remove barriers; Program 3H (AB 2097) allows right-sized parking, boosting the housing yield. This mirrors Paloma's phased reuse of mall

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			parking and the Mark Apartments' conversion of big-parking retail sites into apartments.
29	013002136	425 W FOOTHILL BLVD	V.A.B. INC	Specific Plan	Commercial – Pedestrian	1.10	1.10	0	No	No	No	Yes	13	35	30	17	2	11	An aging motel with a pool and oversized parking on 1.10 acres signals limited long-term viability and strong repositioning potential. At 35 du/ac, the site accommodates 30 homes (17 lower-income). The depth supports a stacked-flat prototype with podium-lite parking; a frontage plaza or retail kiosk can keep a sliver of corridor activation while the bulk of the site flips to housing. Programs 2B and 2R assist the hospitality-to-housing transition; Program 4B reduces standards that might otherwise constrain yield. While not a one-to-one motel case, the feasibility logic aligns with Mission Heritage Plaza's conversion of a marginal service use, and with regional examples where surplus parking and obsolete single-use sites were redeveloped into housing.
30	013003115	227 W FOOTHILL BLVD	SHEMOR REAL ESTATE HOLING LLC	Specific Plan	Commercial – Pedestrian	1.16	1.16	0	No	No	No	Yes	13	35	32	18	2	12	A 1.16-acre commercial pad with a high improvement ratio but little built intensity (most of the land is paved) offers a straightforward infill opportunity. At 35 du/ac, the site accommodates 32 homes (18 lower-income). A compact podium or liner-wrapped configuration can internalize parking and orient homes to landscaped courtyards; the mid-one-acre size keeps costs in check while achieving net density. Programs 2B and 2R provide the regulatory and financial toolkit to flip the land to residential, with Program 4B addressing standards that commonly limit buildout on shallow pads. Comparable patterns—

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Paloma's parking-lot reuse and the Mark Apartments' strip-commercial conversion—demonstrate realistic delivery under similar conditions.
31	012758239	410 W FOOTHILL BLVD	PATEL, DAYALJI R TR	Specific Plan	Commercial – Pedestrian	0.61	0.61	0	No	No	No	Yes	1 unit	35	17	9	1	7	This parcel is developed with an older hospitality use on a modest footprint, with low site coverage and large portions of paved area. The age and condition of improvements, combined with a corridor location, point toward limited long-term viability for lodging. At 0.61 buildable acres, the site supports 17 units at 35 du/ac (9 lower-income). The compact size favors three-story stacked flats or townhome-style multifamily with shared parking and open space. While modest in scale, the parcel's simplicity of reuse improves delivery feasibility, especially when paired with adjacent sites. Redevelopment is supported by Programs 2B, 2R, and 4B. Comparable transitions, including motel-to-housing projects in San Bernardino County, demonstrate realistic potential for repositioning aging hospitality uses into multifamily housing.
32	012758229	426 W FOOTHILL BLVD	TANG, CANG TAN JR	Specific Plan	Commercial – Pedestrian	0.66	0.66	0	No	No	No	Yes	1 unit	35	18	10	1	7	A narrow frontage with oversized forecourt paving presents a clean re-plat opportunity: consolidate driveways, move building mass to the sidewalk with a small address court, and internalize stalls. Flanked by convenience retail and residential blocks, the site can function as a "stitch," introducing stoops/porches and shade trees that make the walk to daily-needs shops safer and more comfortable—particularly at evening hours. At 35 du/ac, the site accommodates 18 homes (10 lower-

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			income). Feasibility is reinforced by 2B/2R, while 4B addresses dimensional/parking standards that can suppress yield on small pads; 2O/2P (Lot Consolidation) leaves optional upside with adjacent underutilized parcels; 3H can further calibrate parking near transit. Similar small-pad conversions like Catalina Apartments (Whittier) and Sierra Fountains Apartments (Fontana) validate the typology and delivery scale.
33	012757237	578 W FOOTHILL BLVD	JULIA & DAVID PROPERTIES INC	Specific Plan	Commercial – Pedestrian	0.93	0.93	0	No	No	No	Yes	1 unit	35	26	14	1	11	This legacy retail/service pad carries a high ratio of paving to structure. A bar-and-court or L-shaped building can frame Foothill with active residential frontage while protecting a quiet interior garden for residents. With residential immediately behind and neighborhood-serving shops within a short walk, new homes here would add "eyes on the street," reduce driveway conflicts by removing redundant curb cuts, and extend a greener, continuous streetwall between nodes. At 35 du/ac, the site accommodates 26 homes (14 lower-income). Programs 2B and 2R underpin the use transition; 4B trims friction (setbacks, height transitions, parking ratios) that can erode feasibility. Regionally relevant precedents—The Plaza at Sierra (Fontana) and Howard & Irene Levine Senior Community (Los Angeles)—show how asphalt-heavy pads reposition to multifamily with improved public realm.
34	012857119	1270 W FOOTHILL BLVD	ELECO LLC	Specific Plan	Commercial – Pedestrian	1.81	1.81	0	No	No	No	Yes	13	35	50	28	3	19	An older commercial strip with a broad parking field sets up a "wrap the parking and internalize the drive"

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			multifamily diagram. Given its mid-block frontage and depth, a four-story wrap or podium with internal courts and amenity bands (fitness, co-work, pool) is feasible, with liner retail optional along Foothill. At 35 du/ac, the site accommodates 50 homes (28 lower-income). Programs 2B and 2R set the capacity and incentives, while Program 4B provides targeted relief (e.g., height, parking calibrations) and Program 3H can eliminate minimum parking where criteria are met. Outcomes would echo Paloma at MainPlace Mall (Orange) and Mission Heritage Plaza (Riverside), where strip-commercial formats repositioned into housing anchored by modern amenities.
35	012760240	118 E FOOTHILL BLVD	CHONG, HYONG KWON	Specific Plan	Commercial – Pedestrian	0.86	0.86	0	No	No	No	Yes	1 unit	35	24	13	1	10	A small, underbuilt pad with excess stalls relative to the single-story structure lends itself to a compact elevator-served building with liner units on Foothill and a tucked court. Adjacent neighborhood uses—residential to the rear and convenience retail within a block—make the transition intuitive: the project would add passive surveillance, shade, and a more walkable frontage where long curb cuts currently dominate. At 35 du/ac, the site accommodates 24 homes (13 lower-income). Programs 2B and 2R support the move to residential; 4B addresses height/parking/coverage details common to small sites; 3H offers additional parking flexibility near transit. Comparable reuses—Nuevo Apartments (Pomona) and Sierra

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Fountains (Fontana)—demonstrate viable delivery at this scale.
36	012757238	564 FOOTHILL BLVD	JULIA & DAVID PROPERTIES INC	Specific Plan	Commercial – Pedestrian	0.54	0.54	0	No	No	No	Yes	1 unit	35	15	8	1	6	A small office with broad side and rear lots presents a low-lift redevelopment: minimal structures to remove, clean site geometry, and immediate tie-in to corridor utilities. Best-fit formats include a compact podium or garden-style walk-up with a central green and tuck-under/pooled parking. At 35 du/ac, the site accommodates 15 homes (8 lower-income). Programs 2B, 2R, and 4B form the entitlement "stack," while Program 3H can reduce parking requirements if criteria are met—useful on small pads where land efficiency is critical. This is the same playbook used on modest pads that became Whittier Park Place (Whittier) and The Mark Apartments (Riverside).
37	012757239	552 W FOOTHILL BLVD	D&Z PROPERTIES LLC	Specific Plan	Commercial – Pedestrian	1.80	1.80	0	No	No	No	Yes	13	35	50	28	3	19	A single-story retail building with extensive behind-the-store parking gives the site "two fronts": a public face on Foothill and a quiet, residential-compatible edge at the rear. That enables a wrapped podium with internal drives and amenity courtyards, while liner units "civilize" the street. At 35 du/ac, the site accommodates 50 homes (28 lower-income). Rezoning capacity and incentives (Programs 2B, 2R) combine with Program 4B's standards relief; AB 2097 under Program 3H can trim parking obligations where eligible. Analogous retail-to-housing reinvestments include Paloma at MainPlace Mall (Orange) and The Mark Apartments (Riverside).

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
38	012857123	1230 W FOOTHILL BLVD	FOOTHILL PLAZA INCORPORATED	Specific Plan	Commercial – Pedestrian	0.91	0.91	0	No	No	No	Yes	1 unit	35	25	14	1	10	A small retail cluster (three buildings) floats in a large parking field, creating near-term phasing options: start at the back lot while limited street-facing retail remains, or full conversion to a residential main street with active corners. A four-story podium or U-shaped wrap around interior open space is plausible. At 35 du/ac, the site accommodates 25 homes (14 lower-income). Programs 2B/2R enhance feasibility and Program 4B removes friction in the standards; AB 2097 (Program 3H) can reduce minimum parking where qualifying. Similar retail field conversions include Paloma at MainPlace Mall (Orange) and the Howard & Irene Levine Senior Community (Los Angeles).
39	013046107	885 E FOOTHILL BLVD	ANDREA 885 LLC	Specific Plan	Commercial – Pedestrian	0.53	0.53	0	No	No	No	Yes	1 unit	35	14	8	1	5	A single-tenant retail structure with more asphalt than activity, this near-one-acre parcel sits at a delivery scale lenders view as efficient for a 3–4 story stacked-flat or podium hybrid. Visibility and shared-access possibilities with neighbors support circulation re-mapping and a "housing-first" layout. At 35 du/ac, the site accommodates 14 homes (8 lower-income). Feasibility is advanced by Programs 2B and 2R; Program 4B can streamline standards, and Program 3H may reduce parking where applicable. Comparable pad conversions include Whittier Park Place/Catalina Apartments (Whittier) and The Mark Apartments (Riverside).
40	012801146	1304 W FOOTHILL BLVD	MALKI LIVING TRUST 11/01/97 AMENDED	Specific Plan	Commercial – Pedestrian	2.95	2.95	0	No	No	No	Yes	21	35	82	45	4	33	A larger-format commercial parcel with multiple pads and expansive parking provides the land area developers favor for economies of scale and robust amenities. Its depth supports a

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			full wrap with internal drives, podium parking, and a network of courtyards that buffer adjacent residential. With corridor exposure and straightforward utility connections, it's a strong anchor site for housing on Foothill. At 35 du/ac, the site accommodates 82 homes (45 lower-income). Programs 2B and 2R secure capacity and incentives; Program 4B reduces regulatory drag; and Program 3H can right-size parking where eligible—key for maximizing residential yield on deep pads. This larger site aligns with regional precedents like The Mark Apartments (Riverside) and Paloma at MainPlace Mall (Orange), where big parking fields were successfully reprogrammed into multifamily housing.
41	012836116	746 W FOOTHILL BLVD	MENDOZA, HILDA O	Specific Plan	Commercial – Pedestrian	0.60	0.60	0	No	No	No	Yes	1 unit	35	16	9	1	6	A compact commercial pad with outsized forecourt paving and a shallow single-story structure reads as classic underbuild for an arterial of this scale. A 3–4 story stacked-flat over podium or podium-lite concept can reclaim the frontage with stoops and a small address court, while screening parking behind a landscaped edge. Flanked by small-format retail and near established neighborhoods, the site can consolidate curb cuts, shorten crossings, and add lighting/trees—quieting turning movements and stitching a missing segment of the Foothill streetwall. At 35 du/ac, the site accommodates 16 homes (9 lower-income). Programs 2B (Rezoning) and 2R (Residential Incentives) set the entitlement and economic basis; 4B (Remove Development Constraints)

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			addresses setbacks, height transitions, and parking; 3H (AB 2097 Parking Near Transit) can further right-size stall counts where eligible. Comparable shallow-pad conversions—Whittier Park Place (Whittier) and Sierra Fountains Apartments (Fontana)—demonstrate delivery feasibility and absorption at this scale.
42	013003102	285 W FOOTHILL BLVD	J & L PROPERTIES	Specific Plan	Commercial – Pedestrian	0.58	0.58	0	No	No	No	Yes	1 unit	35	16	9	1	6	Shallow storefront depth and a broad forecourt lot create a void in the streetwall and long pedestrian exposures across asphalt. A compact podium with a corner entry plaza and a mid-block paseo can re-establish a continuous edge while internalizing stalls. Adjacent daily-needs shops and nearby homes benefit from fewer curb cuts, calmer frontage speeds, and added "eyes on the street," extending a walkable link between nodes. At 35 du/ac, the site accommodates 16 homes (9 lower-income). Feasibility is reinforced by 2B/2R and 4B to trim code frictions; 3H can calibrate parking near transit. Comparable reinvestments—Nuevo Apartments (Pomona) and The Plaza at Sierra (Fontana)—show the same pivot from forecourt parking to housing with active edges.
43	013339108	780 E FOOTHILL BLVD	RIALTO MANAGEMENT GROUP LLC	Specific Plan	Commercial – Pedestrian	0.62	0.62	0	No	No	No	Yes	1 unit	35	17	9	1	7	An older corridor parcel with significant surplus paving and limited building massing is well-suited to a podium-lite or wrapped scheme with a courtyard and Foothill-facing entries. With small retailers on the corridor and residential blocks to the rear, the project can rationalize access, add shade and lighting, and deliver a safer, clearer walking route—converting

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			dead asphalt into address and activity. At 35 du/ac, the site accommodates 17 homes (9 lower-income). Programs 2B and 2R drive the use transition; 4B removes dimensional and frontage constraints common to legacy pads; 3H can reduce parking minimums where transit-proximate. Analog outcomes—Howard & Irene Levine Senior Community (Los Angeles) and Mission Heritage Plaza (Riverside)—illustrate successful conversions on similarly constrained sites.
44	012758220	350 W FOOTHILL BLVD	HA, ROBERT	Specific Plan	Commercial – Pedestrian	0.76	0.76	0	No	No	Yes	Yes	1 unit	35	21	12	1	8	A vacant pad within a cluster of underutilized parcels offers strong potential for phased or consolidated infill. A 3–4 story stacked-flat with a Foothill address court and shared access easements to neighbors can maximize yield while calming the corridor edge. Adjacent low-intensity pads and nearby homes mean new housing would close frontage gaps, create safer crossings by removing redundant driveways, and extend tree canopy to reduce heat-island effects. At 35 du/ac, the site accommodates 21 homes (12 lower-income). 2O/2P (Lot Consolidation) and 2B/2R (rezoning + incentives) bolster assembly and economics; 3H tailors parking if transit-proximate; 4B trims standards that depress net units. Clustered infill precedents—The Plaza at Sierra (Fontana)—show how adjoining pads deliver cohesive multifamily with better public-realm outcomes.
45	012758231	456 W FOOTHILL BLVD	KENNEDY, LYNNE M	Specific Plan	Commercial – Pedestrian	0.55	0.55	0	No	No	No	Yes	1 unit	35	15	8	1	6	Legacy single-story commercial with a large surface lot and minimal FAR is a straightforward repositioning candidate. A compact podium with a

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			single loaded drive aisle and a small forecourt can repair the frontage and buffer the neighborhood interface. Surrounding small shops and nearby housing benefit from fewer conflict points and a greener, better-lit sidewalk—incremental but real corridor repair. At 35 du/ac, the site accommodates 15 homes (8 lower-income). Programs 2B/2R and 4B streamline intensity and standards, while 3H may reduce stall counts near transit. Comparable outcomes—Whittier Park Place (Whittier) and Sierra Fountains (Fontana)—track closely to this parcel's dimensions and delivery mechanics.
46	012760241	110 E FOOTHILL BLVD	TESORO SOUTH COAST COMPANY LLC	Specific Plan	Commercial – Pedestrian	0.78	0.78	0	No	No	No	Yes	1 unit	35	21	12	1	8	An aging gas/car-wash complex dominated by paving and queuing lanes presents high friction for pedestrians and low land productivity. Re-planning to a small apartment house with controlled access, internalized parking, and a landscaped frontage would calm operations and restore a walkable edge. Adjacent retail and proximate homes gain safer crossings and reduced turning conflicts; new lighting, trees, and stormwater planters upgrade corridor comfort and performance. At 35 du/ac, the site accommodates 21 homes (12 lower-income). 2B/2R provide the entitlement path and incentives; 4B simplifies standards typical for auto-to-housing conversions; 3H can further right-size parking. Similar auto-reuse transitions—Whittier Park Place (Whittier) and Mission Heritage Plaza (Riverside)—illustrate the pattern.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
47	012801142	1424 W FOOTHILL BLVD	MALKI LIVING TRUST 11/01/97 AMENDED	Specific Plan	Commercial – Pedestrian	1.71	1.71	0	No	No	No	Yes	13	35	47	26	2	19	A shopping-center configuration with expansive shared parking and an internalized drive court is ripe for a housing-forward re-plan. A wrapped or podium scheme with multiple courtyards and a pedestrian spine can add a meaningful resident base while retaining limited neighborhood-serving space. For surrounding retailers, this brings walk-in customers and steadier evening activity; for adjacent homes, the project replaces a heat-island lot with a shaded, lit frontage and fewer driveways. At 35 du/ac, the site accommodates 47 homes (26 lower-income). 2B/2R and 4B supply capacity, incentives, and code cleanup; 2O/2P can facilitate pad splits or shared access; 3H can calibrate parking in transit areas. Conversions of strip formats—The Mark (Riverside) and Paloma at MainPlace Mall (Orange)—are strong analogs.
48	013041105	735 E FOOTHILL BLVD	CHAU CENTER LLC	Specific Plan	Commercial – Pedestrian	0.77	0.77	0	No	No	No	Yes	1 unit	35	21	12	1	8	Multi-tenant commercial with a broad, underused lot and visible vacancy signals suggests limited status-quo viability. A podium with a corner plaza or small live/work frontage can keep corridor activity while delivering a deeper housing program set behind a landscaped edge. Near daily-needs retail and homes, the project consolidates driveways, adds lighting/trees, and completes a missing block-face—improving the walk and perceptions of safety. At 35 du/ac, the site accommodates 21 homes (12 lower-income). Programs 2B/2R/4B advance intensity and shorten approvals; 2O/2P allows optional adjacency consolidation; 3H can

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			temper parking near transit. Comparable reuses—Nuevo Apartments (Pomona) and The Plaza at Sierra (Fontana)—demonstrate execution on similar corner pads.
49	013046116	304 N PEPPER AVE	AZAR TR 11/28/06	Specific Plan	Commercial – Pedestrian	2.11	2.11	0	No	No	No	Yes	21	35	59	32	3	24	A low-intensity educational/civic parcel with extensive paving and lawn underperforms a site of this size and frontage. A mid-block multifamily plan with shared open space, internalized circulation, and structured/tuck-under parking can add housing while preserving optional civic or community space at the edge. Adjacent civic and residential uses benefit from better lighting, safer mid-block connections, and a consistent sidewalk experience—tempering speeds and improving corridor coherence. At 35 du/ac, the site accommodates 59 homes (32 lower-income). Programs 2B/2R and 4B are applicable; 2H (SB 35 Streamlining) may apply if affordability targets are met; 3H can reduce parking where transit eligibility exists. Precedents—Mission Heritage Plaza (Riverside) and Howard & Irene Levine Senior Community (Los Angeles)—show institutional/civic land successfully incorporating housing.
50	013005128	333 E FOOTHILL BLVD	333 CAPITAL LLC	Specific Plan	Commercial – Pedestrian	2.17	2.17	0	No	No	No	Yes	21	35	60	33	3	24	Corridor retail with deep surplus parking and modest building massing is an archetypal infill opportunity. A podium with a Foothill-facing lobby and an internal courtyard can buffer the street while lifting livability. For neighboring shops, new residents expand the customer base; for adjacent neighborhoods, curb-cut consolidation and a treed frontage improve safety and comfort along

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Foothill. At 35 du/ac, the site accommodates 60 homes (33 lower-income). 2B/2R/4B reinforce intensity and trim entitlement friction; 3H can right-size stall counts. Conversions of similar pads—The Mark (Riverside) and Sierra Fountains (Fontana)—underscore feasibility.
51	013005151	467 E FOOTHILL BLVD	COACHWOOD PROPERTIES L P	Specific Plan	Commercial – Pedestrian	2.07	2.07	0	No	No	No	Yes	21	35	57	31	3	23	A multi-tenant site with heavy asphalt coverage and low FAR can be reorganized as a full block plan. A wrapped scheme with internal drives and a clubhouse/amenity spine delivers efficient modules and a consistent streetwall. Surrounding commercial uses gain foot traffic and evening activity; adjacent homes gain a greener edge and fewer conflict-heavy driveways. At 35 du/ac, the site accommodates 57 homes (31 lower-income). Programs 2B & 2R enhance feasibility; 4B trims standards that impede infill; 2O/2P can coordinate access with neighbors. Analog projects—Paloma at MainPlace Mall (Orange) and The Plaza at Sierra (Fontana)—map closely to this transformation.
52	013315504	312 E FOOTHILL BLVD	BOWMAN, MARLENE D TR 1999	Specific Plan	Commercial – Pedestrian	0.64	0.64	0	No	No	No	Yes	1 unit	35	17	9	1	7	A narrow frontage with a large back-of-house parking field no longer aligns with contemporary retail demand. A three-story stacked-flat with screened parking and a pocket plaza can re-activate the corridor edge while protecting neighborhood interface. Adjacent shops and nearby homes benefit from shorter crossings, improved lighting, and a continuous sidewalk—turning a gap in the block face into active frontage. At 35 du/ac, the site accommodates 17 homes (9

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			lower-income). 2B/2R/4B are determinative, with 3H improving parking feasibility near transit. Comparable shallow-pad redevelopments—Whittier Park Place (Whittier) and Nuevo Apartments (Pomona)—demonstrate uptake at similar scales.
53	013315505	306 E FOOTHILL BLVD	PATEL, HARIVADAN & HANSA LIV TR 06/2	Specific Plan	Commercial – Pedestrian	0.51	0.51	0	No	No	No	Yes	1 unit	35	14	8	1	5	Older shop buildings and sizable paved areas present a clean opportunity for modest-scale multifamily. A podium-lite plan with a rear court and Foothill stoops can provide identity while fitting neighborhood transitions. The adjacent fabric benefits from a calmer frontage, fewer driveways, and a greener edge that links to nearby retail nodes. At 35 du/ac, the site accommodates 14 homes (8 lower-income). Programs 2B/2R support intensity; 4B eases dimensional/parking standards; 3H can reduce stall counts in eligible transit areas. Similar conversions—Sierra Fountains (Fontana) and Whittier Park Place (Whittier)—are instructive.
54	012759123	104 W FOOTHILL BLVD	CHOI, DOO SOON	Specific Plan	Commercial – Pedestrian	0.52	0.52	0	No	No	No	Yes	1 unit	35	14	8	1	5	A legacy retail pad with a high ratio of asphalt to active frontage is underperforming relative to location. A compact stacked-flat prototype with a corner plaza and limited podium can anchor the intersection and internalize parking. Neighboring commercial and residential uses benefit from a safer, more legible corner, improved lighting, and reduced turning conflicts. At 35 du/ac, the site accommodates 14 homes (8 lower-income). 2B/2R/3H (where applicable)/4B collectively de-risk delivery. Precedents—Nuevo Apartments (Pomona) and The Mark

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			(Riverside)—show similar geometry redeveloped to productive housing.
55	012801144	1360 W FOOTHILL BLVD	HARRIMAN, ANNE S FAMILY TRUST 5/31/2	Specific Plan	Commercial – Pedestrian	0.55	0.55	0	No	No	No	Yes	1 unit	35	15	8	1	6	A County preschool pad within a larger center context is characterized by low building coverage and expansive shared parking. A modest stand-alone apartment house or phased pad split can capture underutilized paved area while maintaining institutional function. Surrounding retail and neighborhoods benefit from a greener, better-lit frontage and fewer high-speed turning movements across the apron. At 35 du/ac, the site accommodates 15 homes (8 lower-income). Programs 2B/2R/4B enable re-striping, shared-parking solutions, and residential intensity; 2O/2P supports pad subdivision; 3H may reduce parking near transit. Institutional-to-housing examples—Mission Heritage Plaza (Riverside)—are relevant.
56	012758237	316 W FOOTHILL BLVD	JACK IN THE BOX PROPERTIES LLC	Specific Plan	Commercial – Pedestrian	0.56	0.56	0	No	No	No	Yes	1 unit	35	15	8	1	6	A quick-service restaurant pad with drive aisles and an outsized lot relative to the small building footprint is an ideal candidate for a mid-block apartment building with a landscaped setback. Replacing multiple curb cuts with a single controlled access, adding shade trees, and introducing a lobby/stoop rhythm creates a calmer, safer frontage for nearby residents and corridor users. At 35 du/ac, the site accommodates 15 homes (8 lower-income). 2B/2R/4B advance feasibility; 3H can lower parking ratios if transit-eligible. Similar fast-food pad conversions to multifamily appear in the Appendix B analogs—Whittier Park

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Place (Whittier)—with comparable scale and outcomes.
57	013315502	364 E FOOTHILL BLVD	HUNTER, JACQUES T L TR 4/8/1994	Specific Plan	Commercial – Pedestrian	0.59	0.59	0	No	No	No	Yes	1 unit	35	16	9	1	6	A mixed auto-shop/restaurant parcel where most of the land area is pavement indicates strong redevelopment economics. A compact podium with a Foothill-facing lobby and screened parking can deliver a clean edge and better land productivity. Adjacent shops and residential streets benefit from fewer driveways, calmer operations, and a consistent sidewalk with lighting and street trees. At 35 du/ac, the site accommodates 16 homes (9 lower-income). Programs 2B/2R/4B and 3H (if applicable) collectively right-size standards and stalls. Comparable transitions—The Plaza at Sierra (Fontana) and Nuevo Apartments (Pomona)—fit the pattern.
58	013006124	601 E FOOTHILL BLVD	HUANG FAMILY TRUST (12/30/99)	Specific Plan	Commercial – Pedestrian	0.61	0.61	0	No	No	No	Yes	1 unit	35	17	9	1	7	A single-tenant restaurant on a large pad with high parking-to-building ratio is primed for a small apartment building with a central court and limited podium. Proximity to retail and neighborhoods means new homes will support local merchants while converting an empty lot to an active, shaded frontage with fewer conflict points. At 35 du/ac, the site accommodates 17 homes (9 lower-income). 2B/2R/4B remove intensity and dimensional barriers; 2O/2P allows optional consolidation with neighbors; 3H may reduce parking near transit. Analog outcomes include Sierra Fountains (Fontana) and The Mark (Riverside).

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
59	013315501	380 E FOOTHILL BLVD	MR T'S INC	Specific Plan	Commercial – Pedestrian	0.63	0.63	0	No	No	No	Yes	1 unit	35	17	9	1	7	Another restaurant-format parcel with excess paving and modest structure depth, ideal for a compact podium-lite plan with a corner entry and a small forecourt. Surrounding shops gain nearby customers; residents gain shorter, safer walks to services as curb cuts are consolidated and sidewalks are shaded and lit. At 35 du/ac, the site accommodates 17 homes (9 lower-income). Programs 2B/2R and 4B support entitlement and feasibility; 3H can calibrate parking supply. Comparable redevelopments—Whittier Park Place (Whittier) and Nuevo Apartments (Pomona)—align well.
60	013316407	392 E FOOTHILL BLVD	LEDESMA, MARIO	Specific Plan	Commercial – Pedestrian	0.65	0.65	0	No	No	No	Yes	1 unit	35	18	10	1	7	Multi-tenant commercial with a broad rear lot and limited intensification potential under status quo is a strong candidate for housing. A small podium with internalized parking and a Foothill-oriented entry can deliver a clean frontage transition to neighboring homes. The project fills a streetwall gap, adds trees/lighting to a currently exposed lot, and reduces the number of driveways—incrementally improving comfort and safety along the corridor. At 35 du/ac, the site accommodates 18 homes (10 lower-income). 2B/2R lift intensity; 4B resolves legacy standards; 3H can reduce parking where eligible. Case studies—Mission Heritage Plaza (Riverside) and The Plaza at Sierra (Fontana)—support the same reprogramming logic and delivery scale.
61	012758241	416 W FOOTHILL BLVD	416 WEST FOOTHILL LLC	Specific Plan	Commercial – Pedestrian	0.66	0.66	0	No	No	No	Yes	1 unit	35	18	10	1	7	A shallow, auto-oriented medical office pad with oversized surface parking—

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			classic corridor underutilization that favors compact infill. At 35 du/ac, the site accommodates 18 homes (10 lower-income). A 3–4-story stacked-flat or podium scheme with internalized parking and a modest frontage forecourt can calm driveways, knit into adjacent commercial, and step down toward nearby residential. Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) lift intensity and economics; 3H (AB 2097 Transit-Area Parking) helps right-size stalls where eligible; 4B (Remove Development Constraints) streamlines standards. Similar reprogramming of shallow lots—Howard & Irene Levine Senior Community (Los Angeles) and The Plaza at Sierra (Fontana)—shows how paved pads convert cleanly to housing while improving corridor legibility.
62	012836117	800 W FOOTHILL BLVD	ELJO LLC	Specific Plan	Commercial – Pedestrian	0.69	0.69	0	No	No	No	Yes	1 unit	35	19	10	1	8	Corner commercial with surplus paving and fragmented curb cuts that interrupt the pedestrian edge. At 35 du/ac, the site accommodates 19 homes (10 lower-income). A courtyard or liner-podium building can consolidate access, introduce street trees/lighting, and buffer loading away from the sidewalk. Adjacent vacancies favor phasing or lot assembly. 2B/2R bolster yield; 2O/2P (Lot Consolidation) support assembly potential; 4B addresses height/setback and open-space standards. Comparable edge fixes on corner pads—Mission Heritage Plaza (Riverside) and Whittier Park Place (Whittier)—demonstrate how controlled access and ground-floor

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			activation lift both feasibility and corridor continuity.
63	012801147	1318 W FOOTHILL BLVD	MASUDA, HELEN F LIVING TRUST 9-30-86	Specific Plan	Commercial – Pedestrian	0.77	0.77	0	No	No	No	Yes	1 unit	35	21	12	1	8	Single-tenant restaurant with an outsized lot and wrap-around drive aisles—low coverage in a visible mid-block location. At 35 du/ac, the site accommodates 21 homes (12 lower-income). A compact podium with a forecourt along Foothill can replace redundant drive aisles, bring doors and stoops to the street, and deliver quiet open space behind. 2B/2R incentivize intensity; 3H can trim parking ratios; 4B resolves design/parking constraints. Conversions of food-pad parcels to multifamily—Sierra Fountains Apartments (Fontana) and Nuevo Apartments (Pomona)—illustrate similar lot re-use with good leasing velocity and neighborhood fit.
64	012857121	1260 W FOOTHILL BLVD	ELECO LLC	Specific Plan	Commercial – Pedestrian	0.79	0.79	0	No	No	No	Yes	1 unit	35	22	12	1	9	Older restaurant pad with perimeter parking and wide curb cuts. At 35 du/ac, the site accommodates 22 homes (12 lower-income). A U-shaped podium massing can hold the corner, internalize parking, and stage a small plaza at the primary intersection, smoothing transitions to homes behind. 2B/2R and 4B support the yield and clean up standards; 3H helps right-size parking where in transit influence areas. Similar pads have been re-positioned as efficient walk-up apartments—Whittier Park Place (Whittier) and The Plaza at Sierra (Fontana)—with strong corridor repair benefits.
65	012857122	1220 W FOOTHILL BLVD	ELECO LLC	Specific Plan	Commercial – Pedestrian	0.84	0.84	0	No	No	No	Yes	1 unit	35	23	13	1	9	Another legacy restaurant with heavy paving and minimal building massing—good candidate for a liner-building that

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			restores a continuous streetwall. At 35 du/ac, the site accommodates 23 homes (13 lower-income). A wrapped or stacked-flat scheme can concentrate parking mid-block, add shade trees along the frontage, and calm traffic via fewer driveways. 2B/2R improve feasibility; 2O/2P enable pairing with the flanking pad for shared access; 4B curbs legacy standards. Case studies like Mission Heritage Plaza (Riverside) and Nuevo Apartments (Pomona) mirror this transition from single-purpose pads to productive housing.
66	013041106	745 E FOOTHILL BLVD	NCI HOLDINGS LLC	Specific Plan	Commercial – Pedestrian	0.86	0.86	0	No	No	No	Yes	1 unit	35	24	13	1	10	Multi-tenant strip segment with deep forecourt parking and little street engagement. At 35 du/ac, the site accommodates 24 homes (13 lower-income). A 4-story podium with a corner lobby and through-block paseo can re-stitch the block, with privacy edges toward nearby residential. 2B assures residential entitlement; 2R provides density/fee tools; 4B removes design constraints; 3H can moderate parking. Similar retail-to-residential conversions—The Mark (Riverside) and Paloma at MainPlace (Orange)—show market acceptance and corridor uplift at this scale.
67	013006121	503 E FOOTHILL BLVD	BAROCOHANA, REVOCABLE 1989 TRUST	Specific Plan	Commercial – Pedestrian	0.87	0.87	0	No	No	No	Yes	1 unit	35	24	13	1	10	Restaurant/service pad on ~0.87 acres with redundant drive aisles—excess paving relative to building area. At 35 du/ac, the site accommodates 24 homes (13 lower-income). A courtyard apartment over podium can bring stoops to Foothill, move parking behind gates, and buffer the interface to adjacent commercial. 2B/2R + 4B streamline entitlement and standards; 3H right-sizes stalls where transit

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			proximity applies. Precedents like Sierra Fountains (Fontana) and Whittier Park Place (Whittier) demonstrate similar repositioning outcomes.
68	012806146	1377 W FOOTHILL BLVD	KEY HOLDERS LLC	Specific Plan	Commercial – Pedestrian	0.87	0.87	0	No	No	No	Yes	1 unit	35	24	13	1	10	Low-intensity restaurant with perimeter parking and a corner emphasis; sidewalks lack shade and enclosure. At 35 du/ac, the site accommodates 24 homes (13 lower-income). A C-shaped podium can anchor the corner with active entries, add a pocket plaza, and rationalize access for safer circulation. 2B/2R underpin feasibility; 4B trims setbacks/open-space quirks; 3H reduces parking load. Analogous corner infills—Mission Heritage Plaza (Riverside) and Howard & Irene Levine Senior (Los Angeles)—show absorption strength near services.
69	013005149	425 E FOOTHILL BLVD	ANDY & CINDY REAL ESTATE HOLDINGS LL	Specific Plan	Commercial – Pedestrian	0.92	0.92	0	No	No	No	Yes	1 unit	35	25	14	1	10	Medical office pad with high parking ratios and low FAR—ripe for mixed-use or residential conversion as care uses consolidate elsewhere. At 35 du/ac, the site accommodates 25 homes (14 lower-income). A 3–4-story podium with internalized parking allows a calmer frontage and links into surrounding commercial while stepping down to neighborhoods behind. 2B/2R support the up-zoning economics; 4B addresses parking and design standards. Comparable health-oriented redevelopments—Mission Heritage Plaza (Riverside) and The Mark (Riverside)—demonstrate pathway from office/parking to housing.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
70	012806142	1361 W FOOTHILL BLVD	MARTIAL SHARE TWO 05/04/11	Specific Plan	Commercial – Pedestrian	0.94	0.94	0	No	No	No	Yes	1 unit	35	26	14	1	11	Restaurant pad with deep forecourt parking and multiple curb cuts—visual and operational fragmentation. At 35 du/ac, the site accommodates 26 homes (14 lower-income). A courtyard massing with a small retail-ready corner room (if desired) can maintain corridor activity while delivering housing and consolidating driveways. 2B/2R and 4B ease standards; 3H trims required stalls. Similar pad re-uses—Whittier Park Place (Whittier) and Sierra Fountains (Fontana)—show viable delivery at this acreage.
71	013002120	445 W FOOTHILL BLVD	NASSEREDDINE, JAMAL & FADIA FAM TR 1	Specific Plan	Commercial – Pedestrian	0.94	0.94	0	No	No	No	Yes	1 unit	35	26	14	1	11	Drive-through car wash with sprawling queuing lanes and little productive coverage. At 35 du/ac, the site accommodates 26 homes (14 lower-income). Replacing queuing lanes with a slender podium and active frontage repairs the streetwall and reduces turning conflicts. 2B/2R assist feasibility; 4B fixes leftover standards; 3H mitigates parking where transit proximity applies. Conversions of auto-oriented pads—Whittier Park Place (Whittier); Howard & Irene Levine Senior (Los Angeles)—provide a clear analog.
72	012757228	630 W FOOTHILL BLVD	KING, ALBERT & RHODA DECEDENTS TRUST	Specific Plan	Commercial – Pedestrian	0.96	0.96	0	No	No	No	Yes	1 unit	35	26	14	1	11	Under-built commercial with expansive asphalt; adjacency to complementary commercial and residential supports a housing program that strengthens the corridor. At 35 du/ac, the site accommodates 26 homes (14 lower-income). A podium with a mid-block paseo and street trees can calm the frontage, reduce heat-island, and knit to neighbors. 2B/2R and 4B streamline entitlement and site standards; 2O/2P allow pairing with the contiguous lot

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			for shared access. Parallels include The Plaza at Sierra (Fontana) and Nuevo Apartments (Pomona).
73	012757229	630 W FOOTHILL BLVD	KING, ALBERT & RHODA DECEDENTS TRUST	Specific Plan	Commercial – Pedestrian	0.82	0.82	0	No	No	No	Yes	1 unit	35	23	13	1	9	Companion parcel to ID-72 with similar low coverage and excessive paving—ideal for coordinated planning. At 35 du/ac, the site accommodates 23 homes (13 lower-income). A sibling courtyard building can share a consolidated driveway, expand pedestrian realm, and deliver consistent architectural rhythm. 2B/2R, 2O/2P, and 4B support assembly and unified access. Case pairs like adjacent pads at Mission Heritage Plaza (Riverside) and Sierra Fountains (Fontana) show synergy from coordinated redevelopment.
74	012757231	620 W FOOTHILL BLVD	LUZZI, JERRY Q TR	Specific Plan	Commercial – Pedestrian	0.81	0.81	0	No	No	No	Yes	1 unit	35	22	12	1	9	Restaurant pad with tight building and large apron parking—exact pattern that transitions well to housing. At 35 du/ac, the site accommodates 22 homes (12 lower-income). A compact podium with ground-floor stoops can simplify circulation, add shade canopy, and respect nearby residential with step-backs. 2B/2R and 4B facilitate entitlement; 3H helps calibrate stalls. Comparable pad transformations—Whittier Park Place (Whittier); Sierra Fountains (Fontana)—validate feasibility.
75	012758230	444 W FOOTHILL BLVD	PISCES PROPERTIES	Specific Plan	Commercial – Pedestrian	0.55	0.55	0	No	No	No	Yes	1 unit	35	15	8	1	6	Small commercial pad with high paving ratio; frontage improvements (trees, lighting) and access consolidation will materially improve the block. At 35 du/ac, the site accommodates 15 homes (8 lower-income). A 3-story walk-up over podium or at-grade tuck-under can fit gracefully while buffering

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			the rear. Programs 2B/2R and 4B address yield and standards. Similar modest pads have delivered durable infill—Howard & Irene Levine Senior (Los Angeles) and Nuevo Apartments (Pomona).
76	013005148	409 E FOOTHILL BLVD	BANK OF AMERICA NA	Specific Plan	Commercial – Pedestrian	0.92	0.92	0	No	No	No	Yes	1 unit	35	25	14	1	10	Bank pad with a drive-through loop and oversupplied parking—a textbook candidate for a mid-rise swap-out. At 35 du/ac, the site accommodates 25 homes (14 lower-income). A wrapped or liner podium can hold the corner, bury parking, and create an active lobby edge. 2B/2R and 4B streamline intensity/design; 3H moderates parking. Banking-pad replacements—The Mark (Riverside), Paloma at MainPlace (Orange)—show cost-efficient delivery and corridor repair.
77	013046208	918 E FOOTHILL BLVD	HOSPITALITY GROUP LLC	Specific Plan	Commercial – Pedestrian	1.74	1.74	0	No	No	No	Yes	13	35	48	26	2	20	Larger multi-tenant commercial with extensive asphalt—enough acreage for a true block plan with internal drives, amenity courtyards, and phased development. At 35 du/ac, the site accommodates 48 homes (26 lower-income). A 4-story podium or wrap can consolidate access points, add a green mid-block, and provide a gentler interface to adjacent residential. 2B/2R enable yield; 4B clears legacy ratios; 3H trims stalls if transit-eligible. Strip-to-housing precedents—Mission Heritage Plaza (Riverside) and The Plaza at Sierra (Fontana)—are directly analogous at this scale.
78	013316405	402 E FOOTHILL BLVD	MONTCLAIR INDUSTRIAL PARK LP	Specific Plan	Commercial – Pedestrian	0.65	0.65	0	No	No	No	Yes	1 unit	35	18	10	1	7	Small commercial building with high paving share and limited activation—strong infill candidate. At 35 du/ac, the site accommodates 18 homes (10 lower-income). A stacked-flat over

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			podium with a landscaped setback can soften the edge and close a streetwall gap, improving walkability to nearby services. 2B/2R and 4B support feasibility; 3H can reduce stalls. Similar micro-pads have transitioned successfully—Sierra Fountains (Fontana); Whittier Park Place (Whittier).
79	013339119	702 E FOOTHILL BLVD	AUTOZONE INC	Specific Plan	Commercial – Pedestrian	0.82	0.82	0	No	No	No	Yes	1 unit	35	22	12	1	9	Auto-parts retailer with peripheral parking and low FAR on a visible frontage. At 35 du/ac, the site accommodates 22 homes (12 lower-income). A compact podium introduces active residential entries, replaces excess curb cuts, and enhances the pedestrian realm while buffering service areas to the rear. 2B/2R and 4B remove barriers; 3H supports right-sizing parking. Comparable single-tenant conversions—The Mark (Riverside) and Nuevo Apartments (Pomona)—confirm market appetite.
80	013339118	750 E FOOTHILL BLVD	RIALTO MANAGEMENT GROUP LLC	Specific Plan	Commercial – Pedestrian	2.74	2.74	0	No	No	No	Yes	21	35	76	42	4	30	A nearly 3-acre commercial parcel with expansive surface parking—exactly the delivery scale at which a wrap or podium community with internalized circulation, amenity clusters, and green courtyards pencils efficiently. At 35 du/ac, the site accommodates 76 homes (42 lower-income). Consolidating driveways and adding a double-row of street trees would materially upgrade corridor comfort and safety, while stepping down massing near residential edges. 2B (Rezone) and 2R (Incentives) reinforce intensity; 4B modernizes site/parking standards; 3H can reduce stalls where eligible. Similar strip-center transformations—Mission Heritage

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Plaza (Riverside) and The Plaza at Sierra (Fontana)—underscore feasibility and placemaking payoff.
81	012758221	364 W FOOTHILL BLVD	VO, KIM	Specific Plan	Commercial – Pedestrian	0.62	0.62	0	No	No	Yes	Yes	1 unit	35	17	9	1	7	Shallow, corner-visible infill pad with no structures and direct corridor exposure—an easy lift for compact multifamily that stitches a gap in the Foothill frontage. At 35 du/ac, the site accommodates 17 homes (9 lower-income). A 3–4 story stacked-flat over podium with a forecourt facing Foothill and internalized parking can calm the driveway count and add street trees/lighting, improving pedestrian comfort along the block. Adjacencies (small-format retail, another vacant lot, and established residential behind) support compatible massing and smooth lease-up. Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) enhance yield; 3H (AB 2097 Parking Near Transit) can right-size stalls where eligible; 4B (Remove Development Constraints) clears lingering design/parking barriers. Similar reuses of vacant pads to housing—The Plaza at Sierra (Fontana) and Whittier Park Place (Whittier)—illustrate the same corridor infill logic and delivery scale.
82	012836115	N/A	TUDOR, MARION P & CHERYL G TRS	Specific Plan	Commercial – Pedestrian	2.37	2.37	0	No	No	Yes	Yes	21	35	66	36	3	27	Large vacant interior of a commercial block with broad frontages and simple utilities—ideal for assembling a clean, mid-block neighborhood with paseos and green courts. At 35 du/ac, the site accommodates 66 homes (36 lower-income). The 2.37-acre footprint supports an efficient podium or wrap with internal drives and amenity clusters; adjacency to an auto dealership and residential provides a

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			natural transition from higher-activity retail to quieter homes. Programs 2O/2P (Lot Consolidation) and 2B/2R help realize full-block efficiency; 4B resolves standards; 2H (SB 35 Streamlining) may apply if affordability thresholds are met. Comparable "vacant block to multifamily" deliveries—Mission Heritage Plaza (Riverside) and Nuevo Apartments (Pomona)—show market acceptance and phasing paths.
83	012836118	N/A	ELJO LLC	Specific Plan	Commercial – Pedestrian	0.92	0.92	0	No	No	No	Yes	1 unit	35	25	14	1	10	Underbuilt commercial pad with heavy paving and minimal structures suggests a straightforward scrape-and-build or phased rear-lot infill. At 35 du/ac, the site accommodates 25 homes (14 lower-income). A three-story walk-up or small podium with a pocket plaza at the street can reframe the frontage and bridge to nearby homes. Programs 2B, 2R, and 4B support intensity and reduce soft costs; 3H can trim parking near transit. Case studies like Howard & Irene Levine Senior Community (Los Angeles) and Sierra Fountains (Fontana) demonstrate feasible conversions from paved pads to efficient multifamily.
84	012836119	N/A	HERNANDEZ, RAUL	Specific Plan	Commercial – Pedestrian	0.92	0.92	0	No	No	Yes	Yes	1 unit	35	25	14	1	10	Vacant pad with clear access, flanked by retail and neighborhoods—an easy site plan with minimal demolition and quick utilities. At 35 du/ac, the site accommodates 25 homes (14 lower-income). A courtyard apartment with limited liner retail (if desired by market) can soften the edge to adjacent homes while adding eyes-on-the-street. Programs 2B/2R strengthen feasibility; 4B streamlines frontage and open-space standards; 3H can reduce

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			parking ratios. Analogous small-site infill—Whittier Park Place (Whittier)—shows how modest footprints still yield meaningful affordable units.
85	012836121	N/A	TUDOR, MARION P & CHERYL G TRS	Specific Plan	Commercial – Pedestrian	0.92	0.92	0	No	No	Yes	Yes	1 unit	35	25	14	1	10	Another vacant, mid-corridor pad where land value—not structure value—drives the pro forma. At 35 du/ac, the site accommodates 25 homes (14 lower-income). A compact podium with a shared courtyard and Foothill-addressed lobby can rationalize drive aisles and deliver a calmer residential edge behind. Programs 2O/2P (if assembled), 2B/2R, and 4B reduce risk; 3H supports mobility choice. Comparable transitions from empty lots to multifamily—The Plaza at Sierra (Fontana)—illustrate quick path-to-permit under streamlined standards.
86	012836122	N/A	TUDOR, VLADIMER & MANDINA BY-PASS TR	Specific Plan	Commercial – Pedestrian	1.61	1.61	0	No	No	Yes	Yes	13	35	44	24	2	18	Larger vacant acreage with residential to the rear offers a natural step-down massing strategy and generous internal open space. At 35 du/ac, the site accommodates 44 homes (24 lower-income). A U-shaped podium with mid-block paseo connections can knit the corridor frontage to the neighborhood, replacing blank fencing with a shaded pedestrian route. Programs 2O/2P (if coordinated with neighbors), 2B/2R, 4B, and 2H (if applicable) elevate certainty. Similar outcomes—Mission Heritage Plaza (Riverside)—show how multi-acre blocks can flip from idle land to anchored residential.
87	012857125	N/A	PROPERTY PLUS MOBIL LLC	Specific Plan	Commercial – Pedestrian	1.61	1.61	0	No	No	Yes	Yes	13	35	45	25	2	18	Actively transitioning vacant lot within a retail node; construction momentum nearby reduces perceived risk and supports absorption. At 35 du/ac, the

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			site accommodates 45 homes (25 lower-income). A perimeter-building concept with a corner plaza can tame turning movements and improve bus stop access. Programs 2B/2R, 4B, and 3H (where eligible) support yield; 2H fast-tracks if affordability is met. Precedents like Nuevo Apartments (Pomona) and The Mark (Riverside) validate market appetite for new units at transitioning corners.
88	013046207	918 E FOOTHILL BLVD	HOSPITALITY GROUP LLC	Specific Plan	Commercial – Pedestrian	1.63	1.63	0	No	No	Yes	Yes	13	35	45	25	2	18	Large, clean-slate corner adjacent to a regional drugstore—excellent visibility, simple access control, and shared-trip potential. At 35 du/ac, the site accommodates 45 homes (25 lower-income). A four-story stacked-flat over podium with a pocket green and pedestrian cut-through can shorten walking distances to services and reduce driveway clutter. Programs 2B/2R, 4B, and 3H (if transit-qualified) bolster feasibility. Comparable corner conversions—Mission Heritage Plaza (Riverside)—illustrate successful integration beside active retail anchors.
89	013046102	825 E FOOTHILL BLVD	WANG, TAI YUAN IRREVOCABLE TR 12/12	Specific Plan	Commercial – Pedestrian	2.03	2.03	0	No	No	Yes	Yes	21	35	56	31	3	22	Deep, vacant corridor parcel between institutional and specialty retail uses—ideal for a quiet residential court behind a refined streetwall. At 35 du/ac, the site accommodates 56 homes (31 lower-income). A pair of courtyard buildings with a central green can organize circulation and buffer the church edge. Programs 2B/2R, 4B, and 2H (if applicable) reduce friction; 3H enables parking right-sizing. Similar infill next to faith-based and specialty uses—Howard & Irene Levine Senior (Los Angeles)—

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			demonstrates compatibility and community benefits.
91	013001313	N/A	DIPONIO, JOHN	Specific Plan	Commercial – Mixed Use	0.57	0.57	0	Yes	No	Yes	Yes	1 unit	35	15	8	1	6	Small vacant lot within a cluster of empty pads—prime for coordinated site planning that shares access and utilities. At 35 du/ac, the site accommodates 15 homes (8 lower-income). A three-story walk-up with a compact motor court and a shaded frontage patio can elevate the block's look and knit to adjacent residential. Programs 2O/2P, 2B/2R, and 4B support a bundled approach; 3H trims parking if eligible. Comparable micro-infill—Whittier Park Place (Whittier)—shows lenders will back well-designed small sites when paired with corridor amenities.
92	013001312	N/A	DIPONIO, JOHN	Specific Plan	Commercial – Mixed Use	0.57	0.57	0	Yes	No	Yes	Yes	1 unit	35	15	8	1	6	Another vacant pad in the same cluster—opportunity to phase delivery or share improvements with ID-91 to boost efficiency. At 35 du/ac, the site accommodates 15 homes (8 lower-income). A tight U-court or L-shaped building with landscape buffer to neighbors can deliver privacy and a refined edge. Programs 2O/2P, 2B/2R, 4B underpin feasibility; 3H can further right-size parking. Case studies in Appendix B (e.g., The Plaza at Sierra, Fontana) underscore the value of paired, small-site production.
93	013006105	N/A	CHIU, DAVID	Specific Plan	Commercial – Mixed Use	0.69	0.69	0	Yes	No	Yes	Yes	1 unit	35	19	10	1	8	Vacant frontage between other empties and housing—low conflict, high clarity for residential reuse. At 35 du/ac, the site accommodates 19 homes (10 lower-income). A three-story liner building with a mid-block paseo can soften the corridor and improve walk access to nearby

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			services. Programs 2B/2R, 4B, and 2O/2P (if coordinated) support economics; 3H optimizes stalls. Comparable modest-scale infill—Sierra Fountains (Fontana)—illustrates straightforward delivery on formerly vacant lots.
94	024316113	1610 W FOOTHILL BLVD	VILLEGAS, ROBERTO	Specific Plan	Residential – Mixed Use	0.67	0.67	0	No	No	Yes	Yes	1 unit	35	18	10	1	7	Clean, vacant corner near civic/religious uses and residential—an intuitive transitional housing site with strong sightlines. At 35 du/ac, the site accommodates 18 homes (10 lower-income). A small podium or stacked-flat with a corner plaza can dignify the intersection and shorten walks to nearby community destinations. Programs 2B/2R and 4B expedite approvals; 2H may apply for affordability; 3H helps tune parking. Comparable corners such as Mission Heritage Plaza (Riverside) show demand for well-located, service-adjacent units.
95	012806124	N/A	FOOTHILL BLVD PROPERTY LLC	Specific Plan	Residential – Mixed Use	0.86	0.86	0	Yes	No	No	Yes	1 unit	35	24	13	1	10	County parking area proximate to offices and neighborhoods—ripe for public-private infill that preserves essential stalls via structure while adding homes. At 35 du/ac, the site accommodates 24 homes (13 lower-income). A liner-over-podium concept can maintain weekday capacity while delivering after-hours community space. Programs 2B/2R, 4B, and potential public-site partnerships within the Housing Element framework improve feasibility; 3H reduces the stall load where applicable. Analogous civic-edge projects—Mission Heritage Plaza (Riverside)—illustrate how institutional land transitions to mixed public/housing use.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
96	012808143	N/A	KAPITAL PARTNERS OZ LLC	Specific Plan	Commercial – Mixed Use	1.12	1.12	0	Yes	No	Yes	Yes	13	35	31	17	2	12	Vacant 1.12-acre MU site bracketed by medical and residential—ideal for a health-adjacent community with on-site services. At 35 du/ac, the site accommodates 31 homes (17 lower-income). A courtyard plan with small wellness/telehealth room at ground can leverage proximity to clinics and reduce vehicle trips. Programs 2B/2R, 4B, 2H (if applicable), and 3H (parking) directly support the pro forma. Comparable medical-edge infill—Howard & Irene Levine Senior (Los Angeles)—shows high acceptance and stable absorption.
97	012808145	N/A	KAPITAL PARTNERS OZ LLC	Specific Plan	Commercial – Mixed Use	1.13	1.13	0	Yes	No	Yes	Yes	13	35	31	17	2	12	Vacant MU parcel with minor shared parking today—simple to re-stripe and phase construction without disrupting neighboring offices. At 35 du/ac, the site accommodates 31 homes (17 lower-income). A modest podium with paseo linkage to the clinic next door creates a micro-campus feel and improves daytime activation. Programs 2B/2R, 4B, 3H, and 2O/2P (if small easements are rationalized) improve certainty. Appendix B examples—The Mark (Riverside) and Sierra Fountains (Fontana)—demonstrate similar pads transitioning to multifamily.
98	013001311	625 W FOOTHILL BLVD	DIPONIO, JOHN	Specific Plan	Commercial – Mixed Use	1.13	1.13	0	Yes	No	Yes	Yes	13	35	31	17	2	12	Vacant frontage near commercial and other empty lots provides a low-friction entitlement path and a chance to consolidate driveway cuts. At 35 du/ac, the site accommodates 31 homes (17 lower-income). A forecourt entry with internalized parking and robust street trees can calm traffic and upgrade corridor aesthetics for adjacent parcels. Programs 2B/2R, 4B, and 2O/2P (if paired with neighbors)

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			strengthen feasibility; 3H right-sizes stalls. Analogous corridor infill—Whittier Park Place (Whittier)—illustrates quick delivery on small-to-mid sites.
99	024316151	1630 W FOOTHILL BLVD	NASRE, NABIL & SUZAN REVOCABLE TR 12	Specific Plan	Residential – Mixed Use	1.17	1.17	0	Yes	No	Yes	Yes	13	35	32	18	2	12	Corner-oriented MU lot with residential nearby—great bones for a gateway building that "finishes" the intersection. At 35 du/ac, the site accommodates 32 homes (18 lower-income). A C-shaped podium with a pocket plaza at the corner strengthens pedestrian priority and gives neighbors a shaded waiting spot. Programs 2B/2R, 4B, and 3H (if transit-eligible) enhance yield. Comparable corner reinvestments—Mission Heritage Plaza (Riverside)—show solid leasing velocity and community benefits.
100	013317109	520 E FOOTHILL BLVD	YASMEH, BEHZAD	Specific Plan	Residential – Mixed Use	1.25	1.25	0	No	No	Yes	Yes	13	35	34	19	2	13	Larger vacant MU parcel surrounded by other empties, residential, and light auto service—textbook for a phased two-building plan with shared amenities. At 35 du/ac, the site accommodates 34 homes (19 lower-income). A pair of three-over-podium buildings with a central green can shorten walking distances to daily goods and soften the transition to adjacent homes. Programs 2O/2P (if coordinated), 2B/2R, 4B, and 2H (where applicable) reduce timeline risk; 3H helps curb structured parking costs. Comparable two-building deliveries—The Plaza at Sierra (Fontana) and Nuevo Apartments (Pomona)—affirm feasibility and absorption at this scale.
101	013001302	345 CACTUS AVE	HAHN, BRIAN	Specific Plan	Commercial – Mixed Use	1.67	1.67	0	Yes	No	Yes	Yes	13	35	46	25	2	19	A vacant Commercial–Mixed Use parcel with no demolition cost and

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			strong adjacency to other vacant lots and nearby neighborhoods—ideal conditions for a compact multifamily community that stitches the block back together. At 35 du/ac, the site accommodates 46 homes (25 lower-income). A 3–4 story stacked-flat or light podium prototype with a forecourt on Cactus and a green mews to the interior can internalize parking, calm drive aisles, and frame usable open space. The added resident population would support nearby corridor retail and improve passive surveillance on side streets, while a single access point reduces conflict with pedestrians and bikes. Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives) lift residual land value; Program 4B (Remove Development Constraints) helps right-size standards; and, where applicable, Program 3H (AB 2097 Parking Near Transit) can moderate stall counts to match demand. Similar vacant-pad conversions—Mission Heritage Plaza (Riverside) and Sierra Fountains (Fontana)—show how small blocks can deliver meaningful affordable yield while upgrading corridor edges.
102	013317131	N/A	YASMEH, BEHZAD	Specific Plan	Residential – Mixed Use	2.08	2.08	0	No	No	No	Yes	21	35	58	32	3	23	Underbuilt land within a Residential–Mixed Use setting where much of the lot is open or paved positions this as a straightforward infill play. At 35 du/ac, the site accommodates 58 homes (32 lower-income). A wrap or efficient podium with liner units along the street can convert surplus asphalt into housing, shade trees, and a safer sidewalk edge. The project would

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			buffer adjoining homes with step-downs at the rear and consolidate driveways to simplify circulation. Programs 2B and 2R support intensity and gap-closing incentives; Program 4B streamlines design/parking standards; where within a transit influence area, Program 3H can further right-size parking. Corridor analogs—The Plaza at Sierra (Fontana) and Whittier Park Place/Catalina (Whittier)—demonstrate the same "asphalt-to-apartments" repositioning at this scale.
103	012807130	N/A	KIM, HONGGIE	Specific Plan	Residential	2.09	2.09	0	Yes	No	Yes	Yes	21	35	58	32	3	23	A clean, vacant Residential parcel adjacent to a mix of residential and commercial uses—low friction for site work and approvals. At 35 du/ac, the site accommodates 58 homes (32 lower-income). A courtyard or double-loaded stacked-flat footprint can create a quiet interior open space while presenting an active, well-landscaped frontage to the corridor. Shared amenity rooms placed toward the street add "eyes on" the public realm and reinforce pedestrian comfort. Programs 2B/2R elevate feasibility; Program 4B resolves legacy bulk/height/parking constraints; Program 2H (SB 35 Streamlining) may apply where eligibility is met. Comparable infill on cleared pads—Depot at Santiago (Santa Ana) and Mission Heritage Plaza (Riverside)—illustrate how vacant land can deliver high-amenity housing that knits to surrounding blocks.
104	024316110	1690 W FOOTHILL BLVD	NASRE, NABIL & SUZAN REV TR 12/22/05	Specific Plan	Residential – Mixed Use	2.10	2.10	0	Yes	No	Yes	Yes	21	35	58	32	3	23	A corner, underutilized Residential–Mixed Use lot with substantial non-building area—prime for a gateway statement at the intersection. At 35

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			du/ac, the site accommodates 58 homes (32 lower-income). A podium with ground-floor lobby and small retail-supportive flex space at the corner can anchor the intersection, while step-backs above level 3 reduce bulk facing adjacent homes. Consolidated access and structured parking replace multiple drive cuts, improving safety and walkability along Foothill. Programs 2B and 2R support the mixed-use intensity; Program 4B clarifies frontage and open-space standards; Program 3H may right-size parking if transit-proximate. Precedents like Paloma at MainPlace (Orange) and The Mark (Riverside) show how corner pads can flip from circulation/parking to housing with activated edges.
105	012801132	1364 FOOTHILL BLVD	LPJ INVESTMENT LLC	Specific Plan	Residential – Mixed Use	2.15	2.15	0	Yes	No	Yes	Yes	21	35	60	33	3	24	A vacant corner parcel to a neighborhood retail strip—an easy intensification opportunity that reinforces the corridor node. At 35 du/ac, the site accommodates 60 homes (33 lower-income). A compact wrap or "Texas donut" with a landscaped corner plaza can frame Foothill, hide parking, and still provide quiet terraces at the rear for compatibility with nearby homes. The new residents bolster local businesses and support off-peak activity, addressing current gaps in evening foot traffic. Programs 2B/2R lift FAR and yield via incentives; Program 4B resolves objective design/parking items; Program 3H can bring stalls in line with actual demand. Comparable node-strengtheners—Mission Heritage Plaza (Riverside) and Sierra Fountains

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			(Fontana)—demonstrate the value of adding households at retail crossroads.
106	012801133	475 N LINDEN AVE	HOVAV, ZECHARIA	Specific Plan	Residential – Mixed Use	2.23	2.23	0	No	No	Yes	Yes	21	35	62	34	3	25	A larger vacant Residential–Mixed Use site fronting a collector street—enough land to deliver a lender-friendly, amenity-rich program. At 35 du/ac, the site accommodates 62 homes (34 lower-income). Two mid-blocks with a central green or paseo can organize circulation, shorten utility runs, and step down toward the neighborhood edge. A small corner café/amenity room at Linden can add activity without sacrificing residential yield. Programs 2B and 2R unlock intensity and fee deferrals; Program 4B cleans up bulk/open-space ratios; Program 2O/2P (Lot Consolidation) can capture any shared access with cooperating neighbors. This pattern matches successful mid-block apartments such as The Mark (Riverside) and Whittier Park Place (Whittier).
107	013317108	534 E FOOTHILL BLVD	YASMEH, BEHZAD	Specific Plan	Residential – Mixed Use	2.24	2.24	0	No	No	Yes	Yes	21	35	62	34	3	25	A cleared Residential–Mixed Use pad amid several other vacant holdings—ideal to sequence construction while maintaining corridor operations. At 35 du/ac, the site accommodates 62 homes (34 lower-income). A podium with liner town-flats along Foothill can humanize the frontage, with internalized parking and service off a single drive. Street-tree and lighting upgrades replace today's open pavement, calming speeds and stitching to adjacent blocks. Programs 2B/2R support feasibility; Program 4B standardizes setbacks and glazing along the corridor; Program 3H, if eligible, trims parking ratios to align

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			with market. Similar corridor redevelopments—The Plaza at Sierra (Fontana) and Depot at Santiago (Santa Ana)—show market appetite for this scale and format.
108	013317107	565 E FOOTHILL BLVD	YASMEH, BEHZAD	Specific Plan	Residential – Mixed Use	2.43	2.43	0	No	No	Yes	Yes	21	35	67	37	3	27	One of the larger vacant Residential–Mixed Use pads on the corridor with adjacency to an auto dealer—ample depth for a full block plan and clear phasing. At 35 du/ac, the site accommodates 67 homes (37 lower-income). A two-building strategy—a primary podium facing Foothill with a secondary courtyard building behind—can stage delivery, manage frontage massing, and create an interior amenity spine. Consolidated access and new sidewalks reduce drive conflicts and improve the pedestrian realm near the dealership. Programs 2B/2R and 4B reinforce intensity and streamline approvals; Program 2H (SB 35) may provide ministerial processing where criteria are met; Program 3H can right-size parking near transit. Comparable big-pad redevelopments—Paloma at MainPlace (Orange) and Mission Heritage Plaza (Riverside)—validate this scale and mix.
111	012857126	N/A	PROPERTY PLUS MOBIL LLC	Specific Plan	Commercial – Pedestrian	5.15	5.15	0	No	No	Yes	Yes	30	35	144	79	7	58	A 5-acre vacant Commercial–Pedestrian site with multiple frontages and broad adjacency to both residential and commercial—textbook canvas for a complete neighborhood block. At 35 du/ac, the site accommodates 144 homes (79 lower-income). A gridded internal street/paseo network with 3–4 story buildings can distribute massing, deliver addressable stoops, and phase utilities efficiently. Edges along the

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			corridor can carry active lobbies and small resident-serving flex spaces, while rear edges step down to meet adjacent homes. Programs 2B (Rezoning) and 2R (Incentives) supply the economics for deeper affordability; Program 4B (Remove Constraints) resolves frontage/parking standards; Program 3H (AB 2097) can further calibrate stalls if within a transit area. Comparable large-parcel repositioning—The Mark (Riverside) and Paloma at MainPlace (Orange)—illustrates how expansive asphalt/voids become complete, walkable residential blocks with strong absorption.
400	013001316	N/A	WILLIAMSON FAMILY REVOCABLE LIVING T	Specific Plan	Residential – Mixed Use	0.46	0.46	0	Yes	No	Yes	No	21	35	12	7	1	4	A vacant infill pad (~0.46 buildable acres) with corridor exposure and shallow existing improvements—precisely the geometry that supports a 3–4 story stacked-flat or micro-podium with an addressable forecourt and internalized parking. Consolidating curb cuts, adding trees/lighting, and pulling a clean streetwall to the frontage would materially improve walk comfort while stepping massing and landscape at the rear to respect adjacent residential. At the assumed density, the site accommodates 12 homes (7 lower-income). Programs 2B (Rezone) and 2R (Residential Incentives) lift yield and economics; 4B (Remove Constraints) tunes setbacks/parking for compact prototypes; where eligible, 3H (AB 2097) lets stalls match demand. Comparable small-pad conversions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Park Place (Whittier)—show market-tested feasibility at this scale.
401	013002145	N/A	GOLDEN STAR HOLDINGS LLC	Specific Plan	Commercial – Pedestrian	0.51	0.51	0	No	No	Yes	Yes	30	35	14	8	1	5	Another vacant corridor parcel (~0.51 acres). A three-story walk-up or slim podium can place doors to the street and hide stalls to the interior, closing a visible gap and calming turning movements with a single shared access. At the assumed density, the site accommodates 14 homes (8 lower-income). Programs 2B/2R and 4B support a clean entitlement path; 3H can right-size parking near transit. Precedents such as Whittier Park Place (Whittier) and Nuevo Apartments (Pomona) demonstrate small, visible pads transitioning to efficient multifamily while strengthening corridor edges.
2 – North Riverside Avenue																			
112	012703201	N/A	BLESSED JOHN XXIII CATHOLIC COMMUNIT	Residential 6	R-1A	0.76	0.76	0	Yes	No	Yes	Yes	2.96	39	23	13	1	9	A church-owned vacant parcel embedded in a residential fabric—strong adjacency to homes, and an uncluttered site condition make this a low-friction infill candidate. At 39 du/ac, the site accommodates 23 homes (13 lower-income). A three-story walk-up or compact podium with a neighborhood-facing forecourt and rear step-downs can respect the block's scale while internalizing parking. Residential entrances and a porch/stoop rhythm would knit seamlessly to the single-family edge, improving passive surveillance and sidewalk activity. Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) bolster feasibility; 4B (Remove Development Constraints) can right-size legacy

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			standards; and SB 4 (faith-based streamlining) further enhances entitlement certainty when affordability thresholds are met. Transitions from institutional land or empty pads to housing—Mission Heritage Plaza (Riverside) and Whittier Park Place/Catalina (Whittier)—mirror the same reuse logic at neighborhood edges.
113	012709101	1773 N RIVERSIDE AVE	BETHANY PRESBYTERIAN CHURCH	Office	A-P	4.63	1.16	0	No	No	No	Yes	0	39	36	20	2	14	An active church campus with large surface parking and unbuilt corners—classic underutilization along a commercial corridor with homes behind. At 39 du/ac, the site accommodates 36 homes (20 lower-income). A wrapped or podium building with a thin, active edge on Riverside and step-backs toward rear yards can convert excess asphalt into housing, trees, and lighting while consolidating driveways for safer pedestrian crossings. This adds a resident base to support nearby services and calms an auto-forward frontage. Programs 2B/2R lift yield and gap closing; 4B reduces friction on height/open space/parking; SB 4 provides a ministerial path for qualifying faith-based affordable projects. Institutional-to-housing precedents—Mission Heritage Plaza (Riverside) and Depot at Santiago (Santa Ana)—show comparable delivery at this scale.
114	012708104	1786 N RIVERSIDE AVE	SUMMER MELODY LLC	Office	A-P	2.23	1.12	0	No	No	No	Yes	0	39	34	19	2	13	An older office parcel with a shallow building and expansive parking fields on a commercial corridor. At 39 du/ac, the site accommodates 34 homes (19 lower-income). A compact 3–4 story stacked-flat or light podium prototype

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			that pulls a strong corner, internalizes parking, and screens service can transform an exposed lot into an addressable residential edge. Adjacent homes benefit from rear step-downs and landscape buffers; nearby commercial gains a reliable customer base. Programs 2B/2R support intensity and incentives; 4B cleans up dimensional/parking standards; 3H (AB 2097) can right-size stalls if transit-proximate. Corridor flips from low-coverage commercial to housing—The Plaza at Sierra (Fontana) and The Mark (Riverside)—demonstrate cost-efficient delivery using similar footprints.
115	012708103	1766 N RIVERSIDE AVE	DAVMAC PROPERTIES	Office	A-P	2.25	1.12	0	No	No	No	Yes	0	39	35	19	2	14	Another aging office/low-intensity commercial site with surplus asphalt and limited reinvestment signals, positioned between corridor retail and nearby neighborhoods. At 39 du/ac, the site accommodates 35 homes (19 lower-income). A liner-unit podium or courtyard building can repair the streetwall, consolidate access, and introduce shade, seating, and lighting. Rear step-downs and a planted setback temper massing toward single-family. Programs 2B and 2R improve economics; 4B streamlines objective design and parking; 3H may reduce stall ratios, lowering podium cost. Comparable corridor infill—Sierra Fountains (Fontana) and Paloma at MainPlace (Orange)—illustrates the feasibility of repositioning shallow office pads into multifamily with strong absorption.
116	012705308	1876 N RIVERSIDE AVE	JAA DEVELOPMENT LP	Community Commercial	C-1	0.51	0.51	0	No	No	No	Yes	0	39	16	9	1	6	A small restaurant pad with outsized parking and little building coverage—

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			highly convertible to compact housing while preserving a calm edge to adjacent uses. At 39 du/ac, the site accommodates 16 homes (9 lower-income). A three-story walk-up with tuck-under or podium parking and a planted forecourt would trade drive aisles for front doors and trees, adding "eyes on the street" and evening activity. Programs 2B/2R elevate yield and help with fees or on-site affordability; 4B resolves bulk/open-space ratios; 3H supports demand-based parking where eligible. Similar small-pad conversions—Howard & Irene Levine Senior (Los Angeles) and Whittier Park Place/Catalina (Whittier)—illustrate proven pathways from paved lots to attainable homes.
117	012704102	1833 N RIVERSIDE AVE	FRANKOVICH, PETER & JUDITH TR 06/23/	Community Commercial	C-1	0.77	0.39	0	No	No	No	Yes	0	39	12	7	1	4	A marginal commercial parcel with a modest structure and large, underutilized parking area on Riverside Avenue. At 39 du/ac, the site accommodates 12 homes (7 lower-income). A three-story stacked-flat or town-flat hybrid can infill the street edge, create a small plaza node, and consolidate curb cuts—improving pedestrian comfort and tying into nearby residential blocks. Internalized parking and landscape buffers keep operations compatible with neighbors. Programs 2B/2R lift the land's residential value; 4B addresses parking/objective standards; 3H can further right-size stalls if within a transit influence area. Comparable bite-sized conversions—Sierra Fountains (Fontana) and Mission Heritage Plaza (Riverside)—validate delivery at this scale.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
118	012704143	1817 N RIVERSIDE AVE	TANG, JULIE C	Community Commercial	C-1	0.97	0.48	0	No	No	No	Yes	0	39	15	8	1	6	A slightly larger commercial lot with documented turnover and persistent underbuilding—strong indicators of redevelopment readiness. At 39 du/ac, the site accommodates 15 homes (8 lower-income). A small podium or efficient courtyard plan with a Riverside-facing lobby activates the frontage, while step-backs and trees soften edges toward adjacent residences. Consolidated access and upgraded lighting improve safety and circulation. Programs 2B/2R bolster feasibility; 4B streamlines massing/open-space compliance; 3H can moderate stalls if transit-eligible. Similar mid-block reinventions—Depot at Santiago (Santa Ana) and The Mark (Riverside)—show consistent financing and absorption at this unit count.
119	012705310	N/A	DIGNITY HEALTH	Community Commercial	C-1	4.90	4.90	0	No	No	Yes	Yes	0	39	152	84	8	60	A large vacant holding proximate to medical offices and residential—ample depth for a lender-friendly, amenity-rich program that supports the employment base. At 39 du/ac, the site accommodates 152 homes (84 lower-income). A two-building strategy with an internal paseo—primary frontage building to define the corridor; secondary courtyard building behind—enables phased utilities and mitigates massing at neighborhood edges. New residents strengthen nearby medical and retail, while a single consolidated driveway reduces conflicts. Programs 2B/2R and 4B are pivotal for yield and streamlined standards; 2H (SB 35 Streamlining) may apply if affordable thresholds are met; 3H supports parking calibration if within transit criteria. Large-pad redevelopments—

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Paloma at MainPlace (Orange) and Mission Heritage Plaza (Riverside)—demonstrate the viability of delivering scale with strong placemaking.
402	026417135	N/A	15594 S & M LLC	Residential 6	R-1A	1.02	1.02	0	Yes	No	Yes	Yes	2.96	39	31	17	2	12	A larger vacant lot (~1.02 acres) surrounded by single-family neighborhoods—ideal for a courtyard or L-shaped podium that faces the corridor with an active edge and steps down at the rear with setbacks, trees, and privacy guards. At the assumed density, the site accommodates 31 homes (17 lower-income). Programs 2B and 2R underwrite intensity and pro-forma; 4B resolves dimensional standards; 3H can reduce stall counts where eligible. Comparable neighborhood-edge transitions—Sierra Fountains Apartments (Fontana) and Whittier Park Place (Whittier)—illustrate a gentle scale shift that knits new housing into established blocks.
403	026417137	N/A	Resendez Margaret L	Residential 6	R-1A	2.40	2.40	0	Yes	No	Yes	Yes	2.96	39	74	40	5	29	A 2.40-acre vacant tract with long frontage and deep interior area—right in the delivery sweet spot for a podium or wrap with internal drives, mews courts, and a planted perimeter to buffer adjacent homes. A corner plaza or mid-block paseo can stitch pedestrian circulation and consolidate multiple driveways into one controlled access. At the assumed density, the site accommodates 74 homes (40 lower-income). 2B/2R provide the entitlement/economics framework; 4B modernizes parking/open-space ratios; 2O/2P (Lot Consolidation) offers optional assembly with neighbors for phasing. Similar big-apron conversions—The Mark (Riverside) and Paloma at Main Place (Orange)—show

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			the same repositioning from asphalt to multifamily with strong public-realm gains.
404	026417144	N/A	15594 S & M LLC	Residential 6	R-1A	0.33	0.33	0	Yes	No	Yes	No	2.96	39	10	5	1	4	A compact vacant parcel (~0.33 acres) framed by single-family—ideal for a small, elevator-served walk-up with a landscaped forecourt and a single shared driveway to minimize conflicts. At the assumed density, the site accommodates 10 homes (5 lower-income). 2B/2R and 4B enable yield and streamline small-lot standards; 3H may allow reduced parking near transit. Case studies—Howard & Irene Levine (Los Angeles) and Whittier Park Place (Whittier)—confirm a workable prototype on sites of this size.
405	026417145	N/A	15594 S & M LLC	Residential 6	R-1A	0.33	0.33	0	Yes	No	Yes	No	2.96	39	10	5	1	4	Adjacent to ID-404, this ~0.33-acre vacant pad can mirror a compact stacked-flat plan, sharing access, trash, and stormwater to increase net buildable area and deliver a continuous street tree canopy. At the assumed density, the site accommodates 10 homes (5 lower-income). Programs 2O/2P (assembly) alongside 2B/2R and 4B are the key enablers; 3H can further right-size parking if criteria are met. Comparable paired-pad infill—Whittier Park Place (Whittier)—demonstrates economies of repetition without sacrificing frontage quality.
406	026417146	N/A	15594 S & M LLC	Residential 6	R-1A	0.39	0.39	0	Yes	No	Yes	No	2.96	39	12	6	1	5	A slightly deeper companion (~0.39 acres) that supports the same small-lot playbook: three stories over parking with a forecourt and consolidated access shared with IDs 404–405 to calm turning movements and unify the sidewalk edge. At the assumed density,

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			the site accommodates 12 homes (6 lower-income). 2B/2R, 4B, and 2O/2P keep the envelope efficient; 3H trims stalls where transit proximity applies. Parallels with Nuevo Apartments (Pomona) and Whittier Park Place (Whittier) reinforce feasibility.
407	012711387	1649 N WILLOW AVE RIALTO	Christian Church (Disciples of Christ)	Residential 6	R-1A	1.50	1.50	0	No	No	No	Yes	2.96	39	47	26	3	18	A sizeable church-owned parcel (~1.50 buildable acres) on Willow that can credibly carry a podium with two internal drives, a green forecourt, and a stepped rear massing to transition to nearby homes. At the assumed density, the site accommodates 47 homes (26 lower-income). The block-scale program supports lender-favored efficiency and on-site amenities. 2B/2R provide the density/incentive framework; 4B modernizes standards; 3H can right-size parking. Similar neighborhood-edge multifamily—Sierra Fountains (Fontana) and Mission Heritage Plaza (Riverside)—show successful delivery at this acreage with strong streetscape upgrades.
408	026420124	1685 N EUCALYPTUS AVE RIALTO	More Cash for Homes LLC	Residential 6	R-1A	5.36	5.36	1	No	No	No	Yes	2.96	39	166	91	9	66	A large, mostly vacant tract (~5.36 buildable acres) with an aging single-family home and long Eucalyptus frontage—ideal for a full block-plan: wrapped or podium buildings, internal courtyards, and a network of shaded pedestrian mews. A single consolidated access with corner framing would replace multiple aprons, improving safety and legibility. At the assumed density, the site accommodates 166 homes (91 lower-income). Programs 2B/2R and 4B unlock intensity and efficient standards; 2O/2P can phase sub-districts if needed. Corridor-scale

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			precedents—The Mark (Riverside) and Paloma at Main Place (Orange)—mirror the repositioning of large, underutilized tracts to housing with robust amenity and public-realm packages.
3 – Gateway Specific Plan																			
120	025404113	N/A	RIVERS & LANDS CONSERVANCY	Business Park	R-1A	9.86	9.86	0	No	No	Yes	Yes	0	35	276	152	14	110	Nearly 10 buildable acres of vacant Business Park land present a clean canvas for a master-planned, residential neighborhood concept with internal blocks, greenways, and a legible primary drive. At 35 du/ac, the site accommodates 276 homes (152 lower-income). The adjacency to assisted living and light service uses reduces conflicts and can anchor a mixed-tenure program, while new housing and streets/lighting would convert a blank edge into an active, walkable frontage. Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) lift yield and economics; 4B (Remove Development Constraints) helps calibrate open space/parking; and 2O/2P (Lot Consolidation) supports optional assembly with neighboring underutilized parcels. Corridor conversions of large commercial/parking tracts—such as Mission Heritage Plaza (Riverside) and The Plaza at Sierra (Fontana)—illustrate how underbuilt non-residential land can reposition into efficient multifamily while improving the public realm.
121	025404111	N/A	2245 VALLEY LLC	General Commercial	C-M	10.08	10.08	0	No	No	No	No	0	35	282	155	14	113	A 10-acre C-M parcel dominated by parking and open ground is primed for a phased residential buildout framing a

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			new internal street grid and neighborhood park nodes. At 35 du/ac, the site accommodates 282 homes (155 lower-income). Housing here would stitch together currently disjointed pads, adding sidewalks, trees, and safer crossings along Valley-serving approaches. 2B/2R underpin the intensity and feasibility; 4B tackles design/parking standards; 2O/2P keeps assembly optional. Peer precedents—Nuevo (Pomona) and Paloma at Main Place (Orange)—show how large, auto-oriented lots transform into complete residential communities with strong absorption.
4 – Central Area Specific Plan																			
124	013022226	N/A	CITY OF RIALTO	Downtown Mixed-Use	Support Facilities	1.22	1.22	0	No	Yes	No	Yes	0	38	37	20	2	15	City-owned Downtown Mixed-Use land with meaningful buildable area invites a context-sensitive mid-rise infill that completes the streetwall and activates the block with ground-floor lobby/amenity frontage. At 38 du/ac, the site accommodates 37 homes (20 lower-income). Public ownership streamlines disposition and can target deeper affordability; infill improves Downtown walkability and supports small businesses. Programs 2B/2R and 4B expedite delivery; 2H (SB 35 Streamlining) can apply for eligible affordable projects. Comparables like Mission Heritage Plaza (Riverside) and Whittier Park Place (Whittier) demonstrate catalytic downtown residential over former civic/underutilized parcels.
125	013022216	260 S PALM AVE	RIALTO MASONIC TEMPLE ASSN	Downtown Mixed-Use	Urban Services	0.68	0.68	0	No	No	No	Yes	0	38	20	11	1	8	A small parcel with outsized parking presents a classic tear-down opportunity for compact podium

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			housing that strengthens the Palm Avenue frontage. At 38 du/ac, the site accommodates 20 homes (11 lower-income). New housing would calm driveways, add eyes-on-the-street, and better connect to Downtown services. 2B/2R bolster intensity; 4B right-sizes standards; 2H can streamline if an affordability threshold is met. Similar parking-field reclamations—The Plaza at Sierra (Fontana) and Howard & Irene Levine Senior Community (Los Angeles)—show how modest parcels can deliver impactful infill.
126	013022219	280 S PALM AVE	LANDEXCORP LLC	Downtown Mixed-Use	Urban Services	0.62	0.62	0	No	No	No	Yes	0	38	18	10	1	7	Underutilized commercial with a large lot can transition to a 3–4 story stacked-flat building that completes the block edge and moderates scale toward nearby neighborhoods. At 38 du/ac, the site accommodates 18 homes (10 lower-income). Replacing surplus parking with entries, stoops, and street trees elevates pedestrian comfort and complements adjacent civic/commercial uses. Programs 2B, 2R, and 4B support entitlement efficiency and feasibility. Infill case studies including Whittier Park Place (Whittier) and Mission Heritage Plaza (Riverside) validate the same downtown-edge repositioning.
128	013014116	106 N PALM AVE	RIALTO ASSEMBLY OF GOD	Residential 21	Support Facilities	2.01	0.50	0	No	No	No	Yes	0	38	15	8	1	6	An institutional parcel (church) with limited improvement coverage can host faith-friendly housing or a mission-aligned partnership delivering mixed-income apartments with shared open space. At 38 du/ac, the site accommodates 15 homes (8 lower-income). Edges can step down to adjacent residential, while ground-floor community space invites

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			neighborhood use. Programs 2B, 2R, and 4B improve feasibility; state streamlining for faith-based housing can further de-risk. Analog projects—Mission Heritage Plaza (Riverside) and small-scale church-lot redevelopments in Los Angeles—show workable templates.
129	013022227	N/A	CITY OF RIALTO	Downtown Mixed-Use	Urban Services	1.03	1.03	0	No	Yes	No	Yes	0	38	31	17	2	12	City-controlled Downtown parcel with large open area and minimal encumbrances is well-suited to a courtyard or C-shaped podium plan with active frontage and an internal amenity yard. At 38 du/ac, the site accommodates 31 homes (17 lower-income). Public control enables an RFP with affordability targets; infill reduces curb cuts and strengthens Downtown's walking shed. 2B/2R provide zoning and incentive support; 4B smooths standards; 2H offers potential ministerial processing. Downtown conversions like Mission Heritage Plaza (Riverside) demonstrate similar public-partnered delivery.
130	013022223	N/A	EAGLE HAWK LLC	Downtown Mixed-Use	Core Commercial	0.12	0.12	0	Yes	No	No	No	0	38	3	2	0	1	A very small core-commercial lot functions as a gap site—ideal for a micro-infill or SRO-style building with efficient unit plans and shared amenities. At 38 du/ac, the site accommodates 3 homes (2 lower-income). Even at micro-scale, replacing parking with active frontage mends the streetwall and aids Downtown vitality. Programs 2R (fee/processing relief) and 4B (flexible standards) are pivotal; pairing with adjacent parcels via 2O/2P (Lot Consolidation) can unlock a larger program. Micro-infill precedents in Whittier and Los Angeles show feasibility at this scale.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
131	013022220	N/A	EAGLE HAWK LLC	Downtown Mixed-Use	Core Commercial	0.30	0.30	0	No	No	Yes	No	0	38	9	5	0	4	Corner parking at a prominent Downtown node is a strong candidate for a slender podium or mass-timbered walk-up with a chamfered corner entry and ground-level active use. At 38 du/ac, the site accommodates 9 homes (5 lower-income). Housing here calms turning movements, adds lighting, and links the Post Office block to surrounding retail. Programs 2B, 2R, and 4B guide intensity and workable standards; 2H can expedite approvals if affordability is prioritized. Comparable small-corner infill—Whittier Park Place (Whittier)—demonstrates the street-repair value of building on former parking nooks.
132	013022207	224 S PALM AVE	CARR, BRENDA L	Downtown Mixed-Use	Core Commercial	0.17	0.17	0	No	No	No	No	0	38	5	3	0	2	A shallow Downtown lot with legacy commercial and excess paving can pivot to a compact stack-flat building that keeps a fine-grained rhythm along Palm. At 38 du/ac, the site accommodates 5 homes (3 lower-income). New stoops and a greener setback would buffer neighbors and stitch the block together. 2B/2R enable intensity; 4B addresses setbacks/parking ratios to fit the context. Recent small-parcel multifamily in Whittier and Riverside provide relevant analogs.
133	013022206	N/A	EAGLE HAWK LLC	Downtown Mixed-Use	Core Commercial	0.17	0.17	0	Yes	No	Yes	No	0	38	5	3	0	2	Part of a larger parking field serving civic/retail uses, this slice can support a narrow-frontage apartment house with shared bike/storage space and a rear mews. At 38 du/ac, the site accommodates 5 homes (3 lower-income). Replacing stalls with residents increases passive surveillance and vitality while preserving essential access. Programs 2R and 4B are key to

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			calibrate parking reductions and design flexibility; 2O/2P allows optional coordination with adjoining slivers. Case studies like Mission Heritage Plaza (Riverside) show how civic-adjacent infill can succeed.
134	013014110	236 W 1ST ST	WU, KRISTOPHER JAMES	Residential 21	Office Services	0.32	0.32	0	Yes	No	Yes	No	0	38	9	5	0	4	A small R-21 parcel near church parking is suited to a quiet, neighborhood-scale walk-up with a shared courtyard and stoops facing 1st Street. At 38 du/ac, the site accommodates 9 homes (5 lower-income). The project would knit the residential fabric and add lighting/landscaping where paving dominates. Programs 2B, 2R, and 4B streamline entitlement and tailor standards to context. Analog low-scale infill in Whittier and Riverside confirm market deliverability at this size.
136	013028148	135 W RIALTO AVE	WALES, STEVE F	Downtown Mixed-Use	Support Facilities	0.59	0.59	0	No	No	No	Yes	0	38	18	10	1	7	A shallow, older commercial pad with a generous apron of asphalt and low site coverage—classic Downtown corridor underutilization that lends itself to compact urban infill. At 38 du/ac, the site accommodates 18 homes (10 lower-income). The 0.59-acre footprint comfortably fits a 3–4 story stacked-flat or small podium scheme with internalized parking and a street-facing stoop/forecourt addressing Rialto Ave. Adjacent offices and small commercial storefronts mean new housing can reinforce foot traffic and extend the Downtown fabric; residential behind the block eases the transition in height and scale. Programs 2B (rezone to provide adequate sites) and 2R (residential incentives) unlock intensity and economics; 4B (remove constraints) smooths setbacks/open

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			space/parking; 3H (AB 2097) right-sizes stalls if within a transit area; 2O/2P (lot consolidation) add upside with adjacent small pads. Comparable repositionings of aging pads to mid-block apartments—Mission Heritage Plaza (Riverside) and Whittier Park Place (Whittier)—show the same delivery logic in urban main-street settings.
137	013028135	239 S ORANGE AVE	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.29	0.29	0	No	No	Yes	No	0	38	8	4	0	4	Presently a vacant parcel adjacent to other vacant parcels—conditions that typically precede infill redevelopment as Downtown rents rise. At 38 du/ac, the site accommodates 8 homes (4 lower-income). The 0.29 acres can support a walk-up court or compact podium, with alley or internalized parking and new street trees/lighting along S Orange. Proximity to existing residential improves compatibility/absorption, while cleaning up a heavy auto use lifts the block's pedestrian comfort. 2B/2R enable the housing yield; 4B addresses design/parking standards; 2H (SB 35 streamlining) can apply where eligibility is met; 2O/2P allow assembly with neighbors. Precedents such as The Plaza at Sierra (Fontana) and Howard & Irene Levine Senior Community (Los Angeles) demonstrate transitions from low-productivity lots to efficient multifamily near services.
138	013027104	241 S PALM AVE	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	2	1	0	1	Tiny, underbuilt commercial pad amidst several small and vacant lots—ideal for micro-infill or consolidation. At 38 du/ac, the site accommodates 2 homes (1 lower-income). On 0.08 acres, a duplex or 3-story stacked-flat with tuck-under parking is realistic;

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			pairing with adjacent parcels via Programs 2O/2P (Lot Consolidation) could unlock a 0.24–0.32-acre footprint for a more efficient, elevator-less podium or townhome court. New front doors and canopy trees along S Palm would stitch a more continuous downtown edge, supporting nearby storefronts. 2B/2R (yield/incentives), 4B (standards), and 3H (AB 2097) further improve feasibility. Similar small-lot uptakes are seen at Whittier Park Place (Whittier) and Nuevo (Pomona).
139	013027125	N/A	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	Yes	No	0	38	2	1	0	1	Vacant corner with informal vehicle parking and a shed—highly underutilized and visually prominent. At 38 du/ac, the site accommodates 2 homes (1 lower-income). On an 0.08-acre corner, a duplex or stacked micro-flat with a chamfered entry can anchor the intersection and calm turning movements; pairing this corner with one or two adjacent lots through 2O/2P materially improves yield and financing scale. New units would close a gap in the block face, add eyes on the street, and soften a hard-edged auto corner. 2B/2R/4B/3H supply zoning, incentives, standards relief, and right-sized parking. Comparable small-corner conversions include Mission Heritage Plaza (Riverside) and Howard & Irene Levine Senior Community (Los Angeles).
140	013027103	N/A	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	2	1	0	1	Small commercial pad with surplus asphalt—maintenance and utilization patterns that rarely justify long-term hold in a strengthening center. At 38 du/ac, the site accommodates 2 homes (1 lower-income). A two-to-three-story

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			walk-up with a forecourt addressing the sidewalk is feasible; using 2O/2P to merge with a neighbor yields a more efficient parking/layout ratio. New planting, lighting, and a consolidated driveway reduce conflict points and improve walkability on the block. 2B/2R/4B and 3H provide the entitlement and parking framework; 2H can offer ministerial certainty if qualifying. Parallel makeovers from shallow pads to housing include The Plaza at Sierra (Fontana) and Whittier Park Place (Whittier).
141	013027126	N/A	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	Yes	No	0	38	2	1	0	1	Another small, vacant corner lot—excellent visibility and the ability to "hold" the intersection with a modest, high-quality infill building. At 38 du/ac, the site accommodates 2 homes (1 lower-income). A duplex or stacked flat with a corner entry brings front doors and eyes to the block, replacing chain-link/blank edges. Adjacency to other small parcels invites 2O/2P consolidation into a more financeable quarter-block. 2B/2R deliver the base yield; 4B allows tailored standards; 3H trims parking near transit. The corner-anchoring feel mirrors Mission Heritage Plaza (Riverside) and small-lot prototypes near Nuevo (Pomona).
142	013027102	N/A	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	2	1	0	1	Underbuilt, auto-oriented sliver that reads as leftover asphalt—a prime "capillaries not arteries" infill move in Downtown. At 38 du/ac, the site accommodates 2 homes (1 lower-income). A narrow stacked-flat or mews-house typology can thread the lot, while 2O/2P—coordinated with neighbors—yields a more conventional mid-block scheme. This fills in a visual

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			gap, reduces driveway clutter, and adds consistent lighting/landscaping. 2B/2R/4B set the table; 3H aligns parking with transit. Small-format analogs include Whittier Park Place (Whittier) and Howard & Irene Levine Senior Community (Los Angeles).
143	013027127	N/A	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	2	1	0	1	A micro infill parcel (~0.08 buildable acres) functioning today as a shallow, auto-oriented sliver—exactly the geometry that rewards a tiny, high-efficiency prototype. A duplex-over-flat or tri-plex/stacked-flat can replace exposed paving with doors, stoops, and shade trees while using a single consolidated driveway to calm turning movements. At the assumed density, the site accommodates 2 homes (1 lower-income). The surrounding block mix—neighborhood housing with scattered service uses—supports a gentle massing step-down and steady absorption; curb consolidation and a small forecourt would materially improve walk comfort and perceived safety. Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives), with Program 4B (Remove Development Constraints) tailoring setbacks, frontage, and open-space standards to microlot realities; where eligible, Program 3H (AB 2097 Parking Near Transit) right-sizes stalls. Comparable small-pad conversions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—show how tiny remnants can deliver missing-middle housing while upgrading block edges.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
144	013027101	N/A	SILVA, JOHN O TR	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	2	1	0	1	Another ~0.08-acre corridor remnant with shallow frontage and outsized apron, ideal for a compact 2–3 unit plan that pulls a clean street edge and screens parking at the rear. At the assumed density, the site accommodates 2 homes (1 lower-income). The adjacency pattern (residential behind; light commercial nearby) favors a low-impact transition with stoops, trees, and lighting that stitch a gap in the sidewalk network. Programs 2B/2R establish feasible yield and incentives; 4B cures small-lot friction points; 3H can reduce parking where transit-proximate. The playbook mirrors Whittier Park Place (Whittier) and Nuevo Apartments (Pomona), where small, visible pads were recast into efficient multifamily that strengthens corridor continuity.
145	013028136	249 S ORANGE AVE	SILVA FAMILY TRUST 6/23/94	Downtown Mixed-Use	Urban Services	0.19	0.19	0	No	No	No	No	0	38	5	3	0	2	A narrow Orange Avenue frontage (~0.19 buildable acres) with high pavement ratios and minimal structural value—well-suited to a forecourt-style walk-up with stoops to Orange and a quiet rear mews. A single shared access point replaces scattered aprons, adds canopy trees/lighting, and yields a more comfortable residential edge. At the assumed density, the site accommodates 5 homes (3 lower-income). Nearby homes and neighborhood services support absorption and a gentle scale transition. Program 2B (rezoning) and 2R (incentives) underwrite feasibility; 4B modernizes setbacks/open space/parking for small prototypes; 3H may right-size stalls. Comparable small-frontage transformations—

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Howard & Irene Levine (Los Angeles) and Whittier Park Place (Whittier)—illustrate market-tested delivery at this size with tangible streetscape benefits.
146	013027122	230 S ORANGE AVE	SALAZAR, RONNIE	Downtown Mixed-Use	Urban Services	0.24	0.24	0	No	No	No	No	0	38	6	3	0	3	A slightly deeper companion along Orange (~0.24 buildable acres) that can carry a 3-story stacked-flat or micro-podium with an addressable entry, a small corner or mid-block plaza, and parking internalized to reduce conflicts. At the assumed density, the site accommodates 6 homes (3 lower-income). The plan steps massing and layering of landscape toward adjacent homes to soften the interface, while frontage improvements shorten crossing distances and calm speeds. Programs 2B/2R support intensity and pro-forma; 4B trims small-lot design/parking friction; 3H can reduce required stalls where transit criteria apply. Paired pad infill like Whittier Park Place (Whittier) and corridor right-sizing such as Nuevo Apartments (Pomona) show economies of repetition without sacrificing frontage quality.
147	013027123	234 S ORANGE AVE	REDEVELOPMENT AGENCY OF CITY OF RIAL	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	No	Yes	No	0	38	4	2	0	2	A compact Orange Avenue vacant lot (~0.16 buildable acres)—ideal for a duplex-over-flat or tri-plex with a landscaped forecourt and one consolidated driveway. At the assumed density, the site accommodates 4 homes (2 lower-income). The adjacency of established homes behind and small shops within walking distance supports a quiet residential edge with improved lighting/trees and fewer curb cuts. Program 2B and 2R enable yield and concessions; 4B tailors dimensional standards to small

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			infill; 3H can right-size parking. Comparable small-pad transitions—Howard & Irene Levine (Los Angeles) and Whittier Park Place (Whittier)—validate deliverability and corridor repair at this scale.
149	013027105	237 S PALM AVE	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	No	No	No	0	38	4	2	0	2	A shallow parcel on Palm (~0.16 buildable acres) with auto-oriented geometry and limited structural coverage—well-matched to a 3-unit walk-up or duplex-over-flat with a modest forecourt. At the assumed density, the site accommodates 4 homes (2 lower-income). Consolidating driveway access, adding canopy trees, and pulling a finished streetwall would elevate pedestrian comfort and knit the frontage to nearby homes and services. Programs 2B/2R establish the yield and incentives; 4B modernizes small-lot standards; 3H trims stalls near transit. The move parallels Whittier Park Place (Whittier) and Howard & Irene Levine (Los Angeles), where small pads were converted to context-sensitive multifamily with measurable corridor upgrades.
152	013027112	215 S PALM AVE	LAMB, WILLIAM A	Downtown Mixed-Use	Urban Services	0.21	0.21	0	Yes	No	No	No	0	38	6	3	0	3	A slightly larger Palm Avenue lot (~0.21 buildable acres) with low site coverage and wide apron—appropriate for a 3-story stacked-flat with an addressable entry, stoops, and internalized parking. At the assumed density, the site accommodates 6 homes (3 lower-income). The residential fabric to the rear supports a gentle step-down in height and a planted buffer along lot lines, while the new frontage replaces fragmented curb cuts with a continuous sidewalk and shade canopy. Program 2B (rezoning) and 2R

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			(incentives) are the core enablers; 4B resolves small-lot dimensional/parking issues; 3H can right-size parking where eligible. Comparable neighborhood-edge infill—Whittier Park Place (Whittier) and Nuevo Apartments (Pomona)—demonstrates the same scale and delivery logic.
153	013027120	220 S ORANGE AVE	JOHANNINGSMEIER, MABEL LV TR	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	No	Yes	No	0	38	4	2	0	2	Clean, vacant infill along S Orange with direct adjacency to residential—strong land-use compatibility from day one. At 38 du/ac, the site accommodates 4 homes (2 lower-income). On 0.16 acres, a three-story walk-up with shared rear parking and a small stoop rhythm improves the block face and supports neighborhood-serving businesses within a short walk. 2B/2R support intensity; 4B moderates design/parking standards; 2O/2P can pair this lot with the next for delivery scale; 3H may trim parking. Comparable Downtown infill on small lots—Whittier Park Place (Whittier) and Mission Heritage Plaza (Riverside)—validate the approach.
154	013027106	231 S PALM AVE	JIMENEZ, JOSE	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	No	Yes	No	0	38	4	2	0	2	Vacant property mid-block with straightforward access—minimal demo, maximal site planning flexibility. At 38 du/ac, the site accommodates 4 homes (2 lower-income). A compact U-court or side-loaded walk-up fits on 0.16 acres; adding trees and reducing curb cuts calms S Palm and improves the walking environment to nearby services. 2B/2R/4B deliver yield and standards relief, 2O/2P encourage pairing with adjacent vacancies for better pro formas, and 3H can downshift parking. Analogous micro-block insertions include Nuevo

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			(Pomona) and The Plaza at Sierra (Fontana).
155	013028104	225 S ORANGE AVE	FLORES, JOE Z TR	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	No	Yes	No	0	38	4	2	0	2	Vacant lot with equipment/vehicles—an interim use typical before redevelopment. At 38 du/ac, the site accommodates 4 homes (2 lower-income). A three-story stacked-flat with four-pack parking can resolve the corner-to-mid-block transition; consolidation via 2O/2P improves construction and financing efficiency. Residential to the south frames a gentle edge condition; new units knit a more continuous block, boosting safety/activation. 2B/2R/4B/3H further support feasibility. Compare to Mission Heritage Plaza (Riverside) and Whittier Park Place (Whittier) for similar transitions from low-productivity use to housing.
157	013028139	233 S ORANGE AVE	FELTS REVOCABLE FAMILY TRUST 3/27/18	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	No	No	No	0	38	4	2	0	2	Older commercial with surplus parking (≈66% improvement rate) indicates value is in the land, not the buildings. At 38 du/ac, the site accommodates 4 homes (2 lower-income). The 0.16-acre pad supports a small podium or walk-up; shifting curb cuts and adding street trees upgrades the pedestrian realm and sets a better adjacency with nearby homes. 2B and 2R enable intensity/incentives; 4B tailors standards; 2H may streamline if eligible; 3H moderates stalls. This is the same repositioning logic that produced The Plaza at Sierra (Fontana) and Mission Heritage Plaza (Riverside).
158	013027118	214 S ORANGE AVE	FELTS REVOCABLE FAMILY TRUST 3/27/18	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	1	1	0	0	Small residential lot with excess paved area—an incremental intensification candidate. At 38 du/ac, the site accommodates 1 home (1 lower-

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			income). A duplex ADU-style or stacked-flat addition can be executed with minimal disruption; pairing through 2O/2P with neighbors unlocks a better parking/yield ratio. Added shade, lighting, and frontage improvements elevate the south-Orange micro-district. 2B/2R/4B and 3H keep costs/yield aligned. Precedents for small-lot housing insertions include Whittier Park Place (Whittier) and Nuevo (Pomona).
159	013028103	N/A	FELTS REVOCABLE FAMILY TR 03/27/18	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	2	1	0	1	Storage/yard use with wide apron and low improvement value—classic "next user is housing." At 38 du/ac, the site accommodates 2 homes (1 lower-income). On 0.08 acres, a duplex or stacked-flat is viable; 2O/2P can join it with flanking lots to reach a 0.24–0.32-acre footprint for a more efficient scheme. Converting yard fencing to stoops/porches materially betters the walk along the block. 2B/2R/4B + 3H bolster feasibility. Reference Mission Heritage Plaza (Riverside) and Whittier Park Place (Whittier) for analogous lot-type shifts.
160	013028102	N/A	FELTS REVOCABLE FAMILY TR 03/27/18	Downtown Mixed-Use	Urban Services	0.08	0.08	0	No	No	No	No	0	38	1	1	0	0	Small residential lot with significant paved area—immediate infill potential with minimal demo. At 38 du/ac, the site accommodates 1 home (1 lower-income). An additional unit over parking or a compact duplex stabilizes the block edge; 2O/2P with the neighbor can deliver a stronger pro forma and unified site plan. 2B/2R/4B/3H provide the entitlement/parking toolkit. Similar micro-infill fabric appears around Nuevo (Pomona) and Whittier Park Place (Whittier).

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
161	013027124	238 S ORANGE AVE	CITY OF RIALTO REDEVELOPMENT AGENCY	Downtown Mixed-Use	Urban Services	0.16	0.16	0	No	Yes	No	No	0	38	4	2	0	2	Light industrial/junk-yard style use mid-block, adjacent to homes—strong candidate for cleanup and housing. At 38 du/ac, the site accommodates 4 homes (2 lower-income). A three-story walk-up with rear parking replaces fencing and vehicle storage with active front doors, lighting, and trees—raising the whole block's condition. 2B/2R support the program; 4B allows tailored open-space/parking; 2H can expedite if eligible; 2O/2P provide assembly options. Comparable blocks have transitioned similarly at Mission Heritage Plaza (Riverside) and The Plaza at Sierra (Fontana).
162	013025101	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.07	0.07	0	No	No	Yes	No	0	38	2	1	0	1	Portion of a small Downtown park/open area currently functioning below its long-term potential; edge-of-park pads can sensitively accommodate housing while preserving public space. At 38 du/ac, the site accommodates 2 homes (1 lower-income). A modest duplex with a forecourt and shared green can frame the park edge and add passive surveillance. 2B/2R establish yield; 4B helps right-size frontage/landscape standards; 3H may reduce parking. Park-edge housing is a common urban move, echoed by infill near Mission Heritage Plaza (Riverside).
163	013025102	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.07	0.07	0	No	No	Yes	No	0	38	2	1	0	1	Another sliver of the Central Area small-park block—small but serviceable for incremental capacity or, preferably, combined via 2O/2P. At 38 du/ac, the site accommodates 2 homes (1 lower-income). A tight, stoop-front duplex aligns with the park and upgrades the pedestrian edge. 2B/2R/4B/3H as above. Analogous

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			small-edge insertions appear in the Whittier Park Place (Whittier) area.
164	013025103	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.07	0.07	0	No	No	Yes	No	0	38	2	1	0	1	Final piece of the park-edge trio—completing the opportunity to form a cohesive frontage. At 38 du/ac, the site accommodates 2 homes (1 lower-income). Delivery logic mirrors 162/163: a small duplex or stacked-flat with shared green frontage, unified lighting, and consolidated driveway access. 2B/2R/4B and 3H support feasibility; 2O/2P are recommended to implement a single, coordinated edge. Downtown-edge analogs include Mission Heritage Plaza (Riverside).
165	013025104	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.07	0.07	0	No	No	Yes	No	0	38	2	1	0	1	A sliver infill parcel within the Central Area—currently part of a small park/open-space assemblage—behaves like an edge condition where underused civic frontage can be knit back into the downtown fabric. At 38 du/ac, the site accommodates 2 homes (1 lower-income). Given its micro-scale (≈0.07 ac), a 2–3 story walk-up or micro-court format with stoops to the street and limited on-site stalls (or shared district parking) is the most efficient path to delivery. Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) align by allowing 100% residential in the Downtown Mixed-Use designation and prioritizing yield; 4B (Remove Development Constraints) addresses setbacks/open space and frontage standards typical of tiny lots; 3H (AB 2097 Parking Near Transit) can right-size parking in proximity to Metrolink and bus service. Central Area policies explicitly target ~38 du/ac via an overlay and emphasize by-right

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			entitlement where affordability thresholds are met, improving financing certainty. The site's adjacency to civic uses, green space, and the Metrolink Station supports car-light living and boosts walkability. Comparable small-parcel reinventions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—show how thin, formerly auto-or civic-adjacent pads can be reprogrammed into housing with modest parking, relying on public-realm upgrades and incentives.
166	013025105	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.07	0.07	0	No	No	Yes	No	0	38	2	1	0	1	A companion to ID-165, this 0.07-acre City/RDA parcel sits within a run of shallow civic-frontage tracts used as small park/open space. At 38 du/ac, the site accommodates 2 homes (1 lower-income). As with ID-165, a compact three-pack of flats or a duplex-over-flat prototype can maximize frontage activation while internalizing or sharing parking. Programs 2B/2R secure yield and economics; 4B can tune microlot development standards; 3H reduces stall ratios near transit. The Central Area rezone/overlay strategy (assumed ~38 du/ac) further streamlines delivery and introduces by-right where applicable, mitigating entitlement risk. The parcel ties directly into a walkable network of civic spaces, downtown services, and the Metrolink, supporting low-VMT housing. Comparable outcomes in Whittier Park Place and Catalina Luxury Apartments (Whittier) demonstrate how small auto-adjacent or civic-adjacent remnants can be

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			intensively reused with modest structured or shared parking to deliver missing-middle units.
167	013025106	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.14	0.14	0	Yes	No	Yes	No	0	38	4	2	0	2	Slightly larger at ~0.14 acres, this Central Area pad provides enough depth for a small courtyard or T-shaped walk-up with a forecourt edge to the street. At 38 du/ac, the site accommodates 4 homes (2 lower-income). Assembly with adjacent civic-frontage slivers (where feasible) can yield a more efficient building footprint and a single consolidated curb cut—improving safety and street tree continuity. Programs 2O/2P (Lot Consolidation), alongside 2B/2R and 4B, are the right toolset to realize a combined concept while maintaining by-right eligibility for lower-income set-asides; 3H enables reduced parking near transit. Central Area policy explicitly anticipates this kind of infill at ~38 du/ac. Its adjacency to the Civic Center, businesses, and Metrolink amplifies feasibility and supports demand for small units. Analogous small-block transitions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—illustrate the viability of compact, amenity-light prototypes that lean on public-realm assets.
168	013025135	RIVERSIDE REAR AVE	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Urban Services	0.11	0.11	0	No	No	Yes	No	0	38	3	2	0	1	A rear-fronting vacant lot tucked off Riverside Avenue functions as a service-lane/parking remnant—prime territory for a mews-style infill building that cleans up back-of-house edges. At 38 du/ac, the site accommodates 3 homes (2 lower-income). A two-to-three-story stacked-flat with an internalized mews and limited tuck-

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			under stalls can buffer neighboring uses and convert asphalt into front doors and stoops. Programs 2B/2R support residential primacy in Downtown Mixed-Use; 4B resolves older standards (setbacks, bin/storage placement); 3H can right-size parking given Downtown transit access. The Central Area overlay—with assumed 38 du/ac and by-right pathways—improves lender confidence for small infill. Civic, retail, and rail proximity encourages walk trips and activates an otherwise underused rear corridor. Comparable examples—Whittier Park Place and Catalina (Whittier)—show how rear/auto-oriented pads convert to human-scale multifamily with modest amenity packages.
169	013025136	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.07	0.07	0	No	No	Yes	No	0	38	2	1	0	1	Another micro-parcel embedded in the Downtown park block; incremental redevelopment can pair civic open space with new eyes-on-the-street housing. At 38 du/ac, the site accommodates 2 homes (1 lower-income). The logical prototype is a duplex-over-flat with a small, defensible forecourt and a single shared driveway; consolidated trash/enclosure can be handled off-alley. Programs 2B/2R and 4B reduce friction on tiny sites; 3H helps minimize parking where transit and shared public lots exist nearby. Central Area policies (overlay to ~38 du/ac; by-right with affordability) reduce entitlement risk. Its adjacency to the Civic Center, commercial services, and station area reinforces the demand for compact units. Analogous front-to-park transitions appear in Howard & Irene

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Levine (Los Angeles) and The Mark Apartments (Riverside), where underutilized areas made way for multifamily.
170	013025142	N/A	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Urban Services	0.24	0.24	0	Yes	No	Yes	No	0	38	7	4	0	3	The largest of this downtown micro-cluster (~0.24 ac), this parcel can support a more legible corner or mid-block presence with a small internal court, bicycle storage, and a single consolidated access point. At 38 du/ac, the site accommodates 7 homes (4 lower-income). Program 2B (rezone/overlay) and 2R (incentives) combine to make a 3-story stacked-flat or liner building feasible; 4B cleans up microlot standards; 3H supports low parking ratios near transit. Central Area strategy explicitly plans for ~38 du/ac and by-right approvals when affordability thresholds are met. Walkable adjacency to downtown services, civic amenities, and the Metrolink sustains absorption at small unit counts. Similar small-block projects—Whittier Park Place (Whittier) and The Mark (Riverside)—show how modest footprints can deliver quality infill with limited parking and strong frontage design.
173	013023102	141 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	No	No	0	38	3	2	0	1	A City-owned parcel currently supporting two small commercial structures with excess paving—classic low-coverage downtown land where residential can out-perform marginal retail. At 38 du/ac, the site accommodates 3 homes (2 lower-income). A 2–3 story liner building or stacked flats can replace surface stalls with front doors, while alley-loaded service keeps façades active on Palm. The City's notes flag nearby vacant lots

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			and lot-consolidation potential—a natural fit for Programs 2O/2P (Lot Consolidation). Pair with 2B/2R for yield and 4B to right-size standards; 3H enables parking reductions near transit. The Central Area framework supports ~38 du/ac, with by-right entitlement when affordability criteria are met—ideal for City-led partnerships or RFPs. Proximity to the Civic Center, retail, and Metrolink keeps trips local and supports lower-VMT patterns. Comparable repositionings—Howard & Irene Levine (Los Angeles), Whittier Park Place (Whittier)—demonstrate the same "paving to porches" transition on small downtown pads.
174	013023103	137 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	No	No	0	38	4	2	0	2	Twin to ID-173, this City-owned downtown parcel carries Office-Services history but functions today as underbuilt, auto-oriented frontage. At 38 du/ac, the site accommodates 4 homes (2 lower-income). A small podium or walk-up with a forecourt can stitch Palm Avenue's streetwall, swap driveways for trees/lighting, and share access/enclosures with ID-173 if pursued together under 2O/2P. Programs 2B/2R unlock 100% residential and incentives; 4B streamlines microlot standards; 3H tailors parking to the Central Area's transit-rich context. The City's Central Area strategy (assumed ~38 du/ac, with by-right pathways for affordable projects) improves lender comfort on small, City-controlled infill. Nearness to the Civic Center, shops, and the Metrolink station supports a walkable tenant profile and reinforces

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			downtown reinvestment. Case studies like Catalina (Whittier) and Howard & Irene Levine (Los Angeles) show the same small-parcel playbook—replace surplus asphalt with compact multifamily and front-door activity.
175	013023106	127 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.24	0.24	0	Yes	Yes	No	No	0	38	6	3	0	3	A mid-block parcel with legacy single-structure use and a broad apron of unprogrammed surface area—exactly the kind of underbuilt condition downtown overlays are meant to recalibrate. At 38 du/ac, the site accommodates 6 homes (3 lower-income). The lot's 0.24-acre scale supports a clean three-story stacked-flat or compact podium with a forecourt onto Palm and on-site tuck-under or podium stalls behind an active residential edge. Adjacencies are inherently supportive: City uses and small offices frame a walkable context; nearby vacancies north/south of the block introduce optional assembly paths to optimize massing, drive aisles, and utility runs. The result is a calmer streetwall, fewer curb cuts, and more "eyes on the street," improving the pedestrian experience between civic assets and emerging food/retail on the corridor. Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2U (Site Assembly) to enable multi-parcel planning; Program 4A (Density Bonus) can boost yield with affordability, while Program 3H (AB 2097 Parking Near Transit) and Program 4B (Remove Development Constraints) right-size parking and standards for small infill.
176	013023109	115 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	Yes	No	0	38	4	2	0	2	A vacant pad in a sequence of similarly idle lots gives this block unusual

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			flexibility: multiple loading/parking options and a shot at internalized circulation if paired with a neighbor. At 38 du/ac, the site accommodates 4 homes (2 lower-income). The 0.16 acres pencil for three stories with stoops or small podium, allowing units to face Palm while parking is screened. Adjoining vacancies and low-intensity office uses minimize conflicts during construction and make shared drive or trash/service zones feasible, shrinking curb cuts and stitching the sidewalk. Programs 2B and 2U backstop entitlement and assembly; 3H limits minimums for parking (given proximity to transit), and 4B addresses any residual dimensional frictions typical of tight downtown lots.
177	013023110	109 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	Yes	No	0	38	4	2	0	2	Another clean, vacant infill rectangle that benefits from being mid-string in a cluster of similar parcels—ideal for a small stacked-flat walk-up with 1:1 or better parking behind a landscaped edge. At 38 du/ac, the site accommodates 4 homes (2 lower-income). Adjacent low-scale office/service and empty pads smooth the path for temporary construction staging and a shared utility strategy; the finished condition closes a visible gap on Palm, calming traffic and improving nighttime lighting and passive surveillance. Programs 2B/2U facilitate assembly and yield; 4A enables bonus incentives; 3H and 4B allow right-sized parking and streamlined, objective-standards processing.
178	013023111	105 N PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	Yes	No	0	38	4	2	0	2	North-of-rail Palm frontage with a vacant, regular-shaped lot—excellent

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			for a simple three-over-one or walk-up typology with stoops addressing the sidewalk. At 38 du/ac, the site accommodates 4 homes (2 lower-income). With other vacancies nearby, a short shared-drive easement can unify trash/loading and consolidate curb cuts, elevating the corridor's pedestrian comfort while retaining adequate emergency access. Coupled with small offices and civic uses within walking distance, the site's residential intensity supports lunch-hour foot traffic and after-hours safety. Programs 2B and 2U support multi-lot layouts; 4A improves feasibility via concessions; 3H reduces or eliminates minimum parking near transit; 4B sweeps up any remaining design/code frictions.
179	013023112	103 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	Yes	No	0	38	4	2	0	2	A companion vacant pad that rounds out the Palm string—collectively, these infill sites can operate as one construction program or phased micro-blocks. At 38 du/ac, the site accommodates 4 homes (2 lower-income). The 0.16-acre footprint supports a simple double-loaded bar with screened parking and a small forecourt, further repairing the block edge. The immediate context—vacancies, small offices, and civic destinations—means low displacement risk and high land-use synergy: new residents add customers, foot traffic, and "eyes on the street" that can help stabilize corner retail and improve safety. Programs 2B/2U + 4A + 3H + 4B apply as above.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
180	013023120	126 S ORANGE AVE	VERA, JOHNNY MANUEL	Downtown Mixed-Use	Increased Density Residential	0.24	0.24	0	No	No	No	No	38.4	38	6	3	0	3	A shallow parcel with an older single-unit improvement and significant unprogrammed yard/parking area—precision-fit for a small-lot replat or a compact stacked-flat prototype that brings doors to Orange Ave and hides stalls behind a green edge. At 38 du/ac, the site accommodates 6 homes (3 lower-income). Adjoining residential and vacant pads allow shared service areas and a continuous sidewalk experience; delivering a clean streetwall here improves pedestrian continuity between Palm and Orange anchors. Development economics are aided by Program 2B (rezone standards) and 2U (assembly), with 4A (Density Bonus) and 3H (AB 2097) pairing to maximize yield on a small envelope; 4B (Remove Constraints) addresses setbacks, height transitions, and parking ratios common to tight downtown lots.
181	013023121	132 S ORANGE AVE	WILLIAMSON FAMILY REVOCABLE LIV TR	Downtown Mixed-Use	Increased Density Residential	0.08	0.08	0	No	No	Yes	No	38.4	38	2	1	0	1	A vacant 0.08-acre infill sliver that excels as part of an assembly but can stand on its own with a crisp two- or three-story walk-up (micro-units or studios over flats). At 38 du/ac, the site accommodates 2 homes (1 lower-income). Residential to one side and vacant pads to the other reduce edge conflicts; a single consolidated driveway shared with a neighbor quiets turning movements and widens the planting strip. Program 2U encourages multi-lot coordination; 2B hard-codes mixed-use residential priority; 3H minimizes parking burdens for small projects near transit; 4A and 4B provide incentives and streamline

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			standards to overcome small-parcel economics.
182	013023122	140 S ORANGE AVE	CITY OF RIALTO	Downtown Mixed-Use	Increased Density Residential	0.16	0.16	0	No	Yes	Yes	No	38.4	38	4	2	0	2	Regular-shaped vacant lot with immediate adjacency to other empty pads—prime for a paired entry court or side-loaded parking scheme that keeps the Orange frontage active. At 38 du/ac, the site accommodates 4 homes (2 lower-income). Adjacent uses (vacant/residential) ease construction logistics and long-term compatibility; infill here plugs a visual gap and strengthens lighting and wayfinding between Palm and Orange addresses. 2B + 2U establish the regulatory runway for assembly and yield; 4A and 3H improve feasibility on a small lot; 4B resolves dimensional friction.
183	013023123	144 S ORANGE AVE	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Increased Density Residential	0.16	0.16	0	Yes	No	Yes	No	38.4	38	4	2	0	2	A corner vacancy that can carry enhanced architectural treatment (wrap a corner, add extra glazing, or a live/work entry) and a small mews or paseo connecting to the side street. At 38 du/ac, the site accommodates 4 homes (2 lower-income). Corner prominence plus neighboring vacancies unlock a flexible circulation diagram (shared drive, screened trash) and a safer, brighter pedestrian corner. Entitlement support is provided by 2B (rezoning to mixed-use residential emphasis) and 2U (assembly); 4A and 3H elevate feasibility on compact pads; 4B moderates objective standards where needed.
184	013023124	146 S ORANGE AVE	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Increased Density Residential	0.12	0.12	0	No	No	Yes	No	38.4	38	3	2	0	1	Small, vacant infill that's ideal for 2–3 stories of housing with a modest shared court, tying into the block's emerging residential rhythm. At 38

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			du/ac, the site accommodates 3 homes (2 lower-income). The adjacency to other vacancies encourages a combined fire-turning path and consolidated utilities, trimming costs and curb clutter. Programs 2B + 2U establish the assembly/rezoning framework; 4A (bonus) and 3H (AB 2097) help the parking equation pencil; 4B (constraints removal) keeps the review objective and efficient.
185	013023125	123 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.20	0.20	0	Yes	Yes	Yes	No	0	38	6	3	0	3	A larger vacant pad (0.20 acres) mid-corridor that can carry a four-story stacked-flat with a small podium or efficient surface-court, shielding stalls from view and cleaning up an overly porous curb. At 38 du/ac, the site accommodates 6 homes (3 lower-income). Abutting vacancies and compatible office/civic uses allow phased delivery, common service areas, and a consistent sidewalk canopy, which in turn underwrites safer crossings and more stable retail to the north. Programs 2B and 2U set the policy foundation; 4A, 3H, and 4B complete the feasibility stack.
186	013023126	PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.20	0.20	0	Yes	Yes	Yes	No	0	38	6	3	0	3	A 0.20-acre vacant site on Palm that can team with neighbors for a micro-block plan: shared drive aisle, internal trash, and a pair of small courts stepping the massing to nearby homes. At 38 du/ac, the site accommodates 6 homes (3 lower-income). The result is a tidier frontage with fewer driveways and a thicker street tree canopy—incremental but real public-realm gain. Programs 2U (assembly) alongside 2B enable the plan; 4A and 3H improve yield and parking feasibility; 4B tunes

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			objective standards to small-lot realities.
187	013023127	131 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Office Services	0.16	0.16	0	Yes	Yes	Yes	No	0	38	4	2	0	2	Vacant infill flanked by a community garden and residential—an excellent edge for townhome-style stoops or stacked flats that add "eyes on the green" and reinforce safe activation. At 38 du/ac, the site accommodates 4 homes (2 lower-income). The garden and homes provide immediate neighborhood fabric; a modest, human-scaled frontage plus consolidated service/parking to the rear yields a quieter, safer block. 2B/2U unlock assembly; 4A + 3H bolster feasibility; 4B eases design/code fit.
188	013027113	209 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.24	0.24	0	No	Yes	Yes	No	0	38	7	4	0	3	A 0.24-acre vacant parcel at a visible Palm bend—well-suited for a four-story court building with wrapped parking or a compact podium. At 38 du/ac, the site accommodates 7 homes (4 lower-income). The corner-proximate setting and adjacency to other empty pads make shared access and phased construction straightforward; building here stitches a gap between active blocks, boosting foot traffic and perceived safety. Programs 2B and 2U establish the assembly/preferred land use; 4A, 3H, and 4B support yield and streamline standards.
189	013027114	201 S PALM AVE	CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.20	0.20	0	Yes	Yes	Yes	No	0	38	5	3	0	2	Another vacant mid-block pad that can carry a tidy bar building with a landscaped forecourt and screened parking, calming a busy segment of Palm. At 38 du/ac, the site accommodates 5 homes (3 lower-income). Coordinated design with 188

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			and 190 yields a cohesive streetscape and fewer curb cuts across three addresses. Program stack: 2B (rezoning priority), 2U (multi-lot plans), 4A (bonus), 3H (AB 2097), 4B (objective, streamlined standards).
190	013027115	200 S ORANGE AVE	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.11	0.11	0	Yes	No	Yes	No	0	38	3	2	0	1	Small corner-adjacent vacancy with strong visibility to anchor a micro-lobby, corner glass, or a live/work unit that enlivens the intersection. At 38 du/ac, the site accommodates 3 homes (2 lower-income). Pairing with 189/191 rationalizes driveways and services; finishing this corner improves lighting, sightlines, and pedestrian comfort on the Orange leg. Programs 2B/2U, plus 4A (bonus), 3H (parking near transit), and 4B (remove constraints) are directly applicable.
191	013027116	206 S ORANGE AVE	REDEVELOPMENT AGENCY CITY OF RIALTO	Downtown Mixed-Use	Core Commercial	0.16	0.16	0	Yes	No	Yes	No	0	38	4	2	0	2	Vacant 0.16-acre lot that completes the Orange frontage—ideal for a 3-story stacked-flat with recessed entries and a small green edge. At 38 du/ac, the site accommodates 4 homes (2 lower-income). Coordinated with 190, this infill closes the last gap on the block, reduces turning conflicts via a single shared access point, and extends a continuous street-tree canopy. Programs 2B and 2U enable assembly and ensure residential priority; 4A and 3H strengthen feasibility; 4B streamlines code fit.
5 – Baseline Parcels																			
192	012715113	RIVERSIDE AVE	CHEN, KWANG YUEN LIVING TRUST 12/22/	Residential 21	R-3	2.36	2.36	0	Yes	No	Yes	Yes	17.424	35	66	36	3	27	A large, clean infill opportunity on Riverside ~2.36 buildable acres with residential directly behind. A wrapped or podium format with internal drives, green courtyards, and a Riverside-facing forecourt can consolidate curb

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			cuts, add street trees/lighting, and step massing down at the rear to respect adjacent single-family. The size is right in the lender comfort zone for efficient delivery and robust amenities. At 35 du/ac, the site accommodates 66 homes (36 lower-income). Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives) to capture full residential yield on a corridor site, with Program 4B (Remove Development Constraints) addressing height, setbacks, and open-space ratios; where eligible, Program 3H (AB 2097 Parking Near Transit) can right-size stalls to demand. Comparable corridor conversions—from oversized parking/strip formats to housing—include The Mark (Riverside) and Mission Heritage Plaza (Riverside), as well as Howard & Irene Levine Senior Community (Los Angeles), all demonstrating market acceptance for exactly this repositioning logic.
193	013302329	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.28	0.28	0	Yes	No	Yes	No	2.96	35	7	4	0	3	One of several small vacant pads (~0.28 buildable acres) along E Margarita that function like a ready-made assembly set—perfect for a compact 3-story walk-up or stacked-flat prototype with shared access and internalized parking to present a quiet residential edge. Delivering this site in tandem with the neighboring E Margarita lots yields economies of scale, a single consolidated driveway, and a continuous sidewalk canopy—incrementally transforming a patchwork of aprons into a coherent residential frontage. At 35 du/ac, the site accommodates 7 homes (4 lower-

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			income). Programs 2O/2P (Lot Consolidation) are the catalyst here, paired with 2B (assumed density), 2R (incentives), and 4B (streamlined standards); 3H can further right-size parking if transit criteria apply. This "small-pad to right-sized multifamily" playbook mirrors Appendix B precedents such as Sierra Fountains / Plaza at Sierra (Fontana) and Whittier Park Place (Whittier), where clusters of sub-½-acre lots were sequenced into stable medium-density housing.
194	013302330	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.28	0.28	0	Yes	No	Yes	No	2.96	35	7	4	0	3	A 0.28-acre vacant interior lot on E Margarita Rd with other vacant parcels on either side—ideal conditions for phased or consolidated delivery. At 35 du/ac, the site accommodates 7 homes (4 lower-income). The scale lends itself to attached townhomes or a compact walk-up with shared rear parking. Because multiple like-sized lots line this block, frontage cohesion (shared driveways, continuous sidewalks, street trees) can be achieved incrementally yet still read as a unified neighborhood upgrade. Programs 2B and 2R underpin intensity and pro forma viability; 2O/2P (Lot Consolidation) is particularly relevant here to formalize shared access and achieve a lender-friendly unit count, while 4B trims discretionary friction. Case studies such as Sierra Fountains Apartments (Fontana) and Whittier Park Place (Whittier) confirm that clusters of small pads can be sequenced into stable medium-density housing.
195	013302331	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.23	0.23	0	Yes	No	Yes	No	2.96	35	6	3	0	3	This 0.23-acre vacant corner complements a run of similarly sized

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			lots, creating a natural corner-marker opportunity with a slightly taller mass or a wrapped stoop condition. At 35 du/ac, the site accommodates 6 homes (3 lower-income). Corner orientation supports enhanced visibility and safer geometry via driveway reduction and bulb-outs; pairing with adjacent parcels simplifies trash, loading, and fire access. Programs 2B, 2R, and 4B raise achievable yield and streamline entitlement, while 2O/2P can unify the corner with mid-block parcels for a single construction mobilization. Comparable small-parcel assemblies along corridors—The Plaza at Sierra (Fontana) and Howard & Irene Levine Senior Community (Los Angeles)—demonstrate cost-efficient delivery at this scale.
196	013302328	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.23	0.23	0	Yes	No	Yes	No	2.96	35	6	3	0	3	A 0.23-acre vacant mid-block site surrounded by other vacant lots and nearby homes—prime for a walk-up apartment format with secure rear courts. At 35 du/ac, the site accommodates 6 homes (3 lower-income). Adjacent residential improves neighborhood fit and reduces change-management concerns; coordinated frontage improvements across this block could transform a patchwork of drive aprons into a shaded sidewalk spine. Programs 2B and 2R support yield and incentives; 2O/2P is the key catalyst for shared access and stormwater, and 4B addresses setbacks/parking to keep prototypes efficient. Analogous small-lot multifamily delivered in corridors—Whittier Park Place (Whittier) and

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Nuevo Apartments (Pomona)—reinforce feasibility.
197	013302327	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.23	0.23	0	Yes	No	Yes	No	2.96	35	6	3	0	3	Another 0.23-acre vacant lot in the same block pattern, enabling repetition of a proven plan set to reduce soft costs. At 35 du/ac, the site accommodates 6 homes (3 lower-income). In combination with IDs 194–196/198–199, a builder can standardize modules, stagger starts, and coordinate frontage to deliver a coherent streetscape (trees, lighting, and fewer curb cuts). Programs 2B, 2R, and 2O/2P together are pivotal for turning contiguous small sites into one financeable phase; 4B removes lingering dimensional constraints that complicate stacking parking and open space on tight parcels. Corridor precedents—Sierra Fountains Apartments (Fontana) and Whittier Park Place (Whittier)—underscore the approach.
198	013302326	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.23	0.23	0	Yes	No	Yes	No	2.96	35	6	3	0	3	A 0.23-acre vacant lot mirroring adjacent parcels; repetition supports economies of scale in design and procurement. At 35 du/ac, the site accommodates 6 homes (3 lower-income). Proximity to other vacant lots allows shared bio-retention and a single access aisle, maximizing net buildable area while improving pedestrian comfort. Programs 2B, 2R, and 2O/2P reinforce feasibility and assembly; 4B tailors parking and open-space ratios to small-site realities. Comparable clusters transitioning to compact multifamily—The Plaza at Sierra (Fontana) and Nuevo Apartments (Pomona)—provide a clear delivery analogue.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
199	013302325	E MARGARITA RD	YANG, YEA-CHIH	Residential 6	R-1A	0.27	0.27	0	Yes	No	Yes	No	2.96	35	7	4	0	3	Slightly larger at 0.27 buildable acres, this vacant interior parcel can anchor mid-block access and utility routing for the E Margarita cluster. At 35 du/ac, the site accommodates 7 homes (4 lower-income). A repeated three-story walk-up with a shared rear mews yields a consistent façade rhythm and improves perceived safety through "eyes on the street." Programs 2B and 2R improve project math; 2O/2P supports formal consolidation (and lender comfort) across multiple APNs; 4B removes residual dimensional barriers. Corridor conversions on small pads—Whittier Park Place (Whittier) and Sierra Fountains Apartments (Fontana)—demonstrate the same block-by-block placemaking effect.
200	012728106	1230 N LILAC AVE	RIALTO METHODIST CHURCH	Community Commercial	R-3	4.00	1.00	0	No	No	No	Yes	17.424	35	28	15	1	12	A faith-based campus with a modest building footprint and extensive surplus parking/yard area, making it a strong candidate for a housing partnership that can retain or reconfigure institutional space. Although 4.00 gross acres are mapped, the buildable acreage is 1.00, and at 35 du/ac the site accommodates 28 homes (15 lower-income). The programmatic sweet spot is a 3–4-story block with internal circulation and a green forecourt addressing Lilac; adjacency to nearby homes enhances compatibility and absorption. Program 2B (Rezone) and 2R (Residential Incentives) position the site for full residential yield; 4B (Remove Development Constraints) can reconcile parking and height; 2H (SB 35 Streamlining) may apply with deeper affordability. State policy for faith-

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			based housing (e.g., SB 4) aligns with this repositioning. Comparable institutional transitions—Mission Heritage Plaza (Riverside) and Howard & Irene Levine Senior Community (Los Angeles)—show how surplus church land can deliver needed housing while improving block edges and pedestrian comfort.
300	026421351	E BASE LINE RD	JIN, HOWARD	Community Commercial	R-3	0.87	0.87	0	No	No	Yes	Yes	0	35	24	13	1	10	A vacant corner parcel (~0.87 buildable acres) with community-commercial surroundings and established neighborhoods behind—classic corridor underutilization ready for a compact podium or 3–4 story stacked-flat building. A corner-addressed entry court and wrapped ground-level parking can consolidate multiple curb cuts into one controlled access, add trees/lighting, and create a stronger streetwall at the intersection; stepping massing and landscaping at the rear respects the residential edge. At the assumed density, the site accommodates 24 homes (13 lower-income). Adjacencies matter here: everyday services on Baseline, a neighborhood network to the south, and a visible corner position that can carry a small public-facing plaza or live/work front to animate the node. Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives) to capture full residential yield, with Program 4B (Remove Development Constraints) tuning height, setbacks, and open-space ratios; where criteria are met, Program 3H (AB 2097 Parking Near Transit) can right-size stalls to actual demand. If a

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			neighbor is willing, Programs 2O/2P (Lot Consolidation) allow a corner-plus-mid-block assembly for shared access and stormwater, improving pro-forma and streetscape continuity. Comparable corner/auto-pad conversions—Paloma at Main Place (Orange), The Mark (Riverside), and Whittier Park Place (Whittier)—show the same repositioning logic from surplus land to context-sensitive multifamily.
6 – Baseline Shopping Center																			
202	012732122	1169 N RIVERSIDE AVE	VICTORIA GUERNSEY INC	Community Commercial	C-1A	0.73	0.73	0	No	No	No	Yes	0	30	17	9	1	7	A drive-through pad with wide curb cuts and surplus parking—classic auto-oriented geometry that's underbuilt for a primary corridor. At the assumed density, the site accommodates 17 homes (9 lower-income). The near three-quarter-acre footprint comfortably supports a 3–4 story stacked-flat or small podium with internalized stalls and a Riverside-addressed entry court. Adjacent inline commercial provides everyday services, while neighborhoods to the rear ease the transition and bolster absorption. Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) lift feasibility, with 4B (Remove Development Constraints) dialing in height/parking flexibility; 3H (AB 2097 near transit) can right-size stalls if eligible. The repositioning logic mirrors auto-pad conversions cited in Appendix B—e.g., Howard & Irene Levine Senior Community (Los Angeles) and Paloma at Main Place (Orange)—which turned

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			surplus drive aisles and parking fields into efficient multifamily.
203	012732140	115 E BASELINE AVE	VELAZQUEZ, GONZALO	Community Commercial	C-1A	0.53	0.53	0	No	No	No	Yes	0	30	12	7	1	4	A small restaurant parcel with a shallow building and outsized lot circulation. At the assumed density, the site accommodates 12 homes (7 lower-income). Its half-acre scale pencils for a compact podium or three-story walk-up with a forecourt on Baseline and shared parking to the interior. Proximity to corridor services and residential blocks behind creates a gentle land-use step-down and supports walkability upgrades (fewer driveways, better lighting/trees). Programs 2B, 2R, and 4B remove regulatory friction; 2H (SB 35 Streamlining) becomes relevant if deeper affordability is pursued. Comparable retail-pad conversions such as Whittier Park Place (Whittier) and Paloma at Main Place (Orange) validate delivery at this scale.
204	012731124	271 W BASELINE AVE	SHAHBAZIAN FAMILY TRUST 08/12/2008	Community Commercial	C-1	1.01	1.01	0	No	No	No	Yes	0	30	24	13	1	10	Underperforming single-tenant retail with a sea of asphalt and multiple curb cuts. At the assumed density, the site accommodates 24 homes (13 lower-income). One acre allows an L-shaped podium or wrapped format oriented to Baseline, with internal drives and a planted edge to buffer adjacent residential. Corridor reinvestment potential is high—filling a frontage gap, calming turning movements, and adding eyes on the street. Programs 2B/2R improve economics; 4B updates legacy parking/landscape standards; 3H can right-size stalls near transit. Appendix B shows the same pattern in The Mark Apartments (Riverside) and Paloma at Main Place (Orange)—strip-

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			commercial parking fields repositioned into multifamily.
205	012726105	298 W BASELINE AVE	SEDLACHEK, ALEXANDER DOUGLAS	Community Commercial	C-1	0.51	0.51	0	No	No	No	Yes	0	30	12	7	1	4	A small commercial building with broad, low-intensity parking aprons. At the assumed density, the site accommodates 12 homes (7 lower-income). Roughly six-tenths of an acre supports a courtyard or liner-podium prototype that addresses Baseline with active frontages while tucking resident parking inside. Adjacency to neighborhood streets improves compatibility and provides multiple access options for construction phasing. Programs 2B, 2R, 4B are the key enablers; if a joint plan with neighbors materializes, 2O/2P (Lot Consolidation) boosts scale. Similar right-sizing of small pads into housing is documented with Howard & Irene Levine (Los Angeles) and Whittier Park Place (Whittier).
206	012732146	173 E BASELINE AVE	MOHAMMAD, IBRAHIM	Community Commercial	C-1A	0.50	0.50	0	No	No	No	Yes	0	30	12	7	1	4	A low-coverage retail building with an oversupply of surface stalls. At the assumed density, the site accommodates 12 homes (7 lower-income). Half an acre is well-suited to a three-story walk-up or micro-podium with a mid-block paseo and internalized parking, improving the pedestrian realm and complementing nearby homes and shops. Programs 2B/2R elevate feasibility, 4B addresses standards, and 3H can reduce parking ratios where transit proximity applies. Appendix B illustrates parallel outcomes on small commercial pads (e.g., Whittier Park Place, Whittier) and senior infill on surplus parking (Howard & Irene Levine, Los Angeles).

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
207	012732147	201 E BASELINE RD	LIN, YAO	Community Commercial	C-1A	1.56	1.56	0	No	No	No	Yes	0	30	37	20	2	15	A restaurant pad with drive aisles occupying most of the site. At the assumed density, the site accommodates 37 homes (20 lower-income). At 1.56 acres, delivery scale supports a full podium with internal drives, a residential lobby on Baseline, and on-site amenities—while enhancing the corridor with fewer curb cuts and better lighting/landscaping. Programs 2B and 2R enable intensity; 4B modernizes parking/open-space standards; 2H offers streamlining at deeper affordability. Comparable retail-to-housing transitions—The Mark (Riverside) and Paloma (Orange)—underscore feasibility at this acreage.
208	012732105	291 E BASELINE ST	LEXKIN LLC	Community Commercial	C-1A	0.51	0.51	0	No	No	No	Yes	0	30	12	7	1	4	Older commercial with minimal building coverage and heavy hardscape. At the assumed density, the site accommodates 12 homes (7 lower-income). The half-acre scale favors a stacked-flat prototype with a Baseline-facing forecourt and private open space oriented away from traffic, knitting new residents into adjacent neighborhoods and supporting local shops. Programs 2B/2R/4B are the core levers; 3H can trim parking where applicable. Appendix B analogs—Whittier Park Place (Whittier) and Howard & Irene Levine (Los Angeles)—show nearly identical site physics.
209	012731121	211 W BASELINE RD	LARLAND LLC	Community Commercial	C-1	1.20	1.20	0	No	No	No	Yes	0	30	28	15	1	12	A mid-block commercial parcel with broad paving and underutilized frontage. At the assumed density, the site accommodates 28 homes (15 lower-income). The 1.2-acre lot supports a liner-podium or C-shaped courtyard plan with internal parking

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			and street-facing entries to repair the pedestrian edge and slow turning movements. Programs 2B, 2R, 4B directly address intensity, incentives, and legacy standards, with 3H available where transit criteria are met. Case studies—The Mark (Riverside) and Paloma (Orange)—affirm the jump from excess asphalt to multifamily.
210	012726112	154 W BASELINE RD	KIM FAMILY TRUST 8/30/11	Community Commercial	C-1A	2.14	2.14	0	No	No	No	Yes	0	30	51	28	3	20	Large single-use retail with expansive parking fields. At the assumed density, the site accommodates 51 homes (28 lower-income). The 2.14-acre footprint supports a podium or wrap with internalized circulation, allowing a strong streetwall on Baseline and generous on-site amenities. Adjacent commercial keeps daily needs within walking distance, while nearby residential improves compatibility and absorption. Programs 2B/2R promote intensity; 4B allows right-sizing of parking and open space; 2O/2P can unlock assembly with neighbors if desired. Appendix B's The Mark (Riverside) and Paloma (Orange) exemplify similar repositioning of big paved lots to housing at this scale.
211	012726108	240 W BASELINE RD	HART, CHARLES RICHARD JR FAM TR 1-3-	Community Commercial	C-1A	0.52	0.52	0	No	No	No	Yes	0	30	12	7	1	4	A shallow commercial pad dominated by parking and drive aisles. At the assumed density, the site accommodates 12 homes (7 lower-income). The near half-acre area supports a 3-story walk-up or micro-podium with a Baseline-facing entry plaza, trimming curb cuts and improving the pedestrian realm. Residential behind provides a gentle transition and a ready customer base for ground-level activation if pursued. Programs 2B, 2R, and 4B remove the

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			main barriers; 3H can reduce stall counts near transit. Comparable small-pad conversions—Whittier Park Place (Whittier) and Howard & Irene Levine (Los Angeles)—demonstrate viability.
212	012731119	111 W BASELINE RD	EMS FAMILY LP	Community Commercial	C-1A	8.64	8.64	0	No	No	No	Yes	0	30	207	114	10	83	A large, underbuilt commercial tract (~8.64 buildable acres) with deep interior fields and multiple drive aisles—precisely the scale where a full block-plan multifamily concept becomes both feasible and transformative. A podium or slim wrap with internal circulation, multiple courtyards, and a planted perimeter can step massing down toward adjacent single-family while presenting a continuous, walkable edge to Baseline. Consolidating scattered curb cuts into two controlled entries, adding street trees and pedestrian lighting, and introducing a corner plaza or mid-block paseo would convert a car-dominant frontage into a legible neighborhood address. At the assumed density, the site accommodates 207 homes (114 lower-income). Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) supply the entitlement and economic runway for full residential yield; 4B (Remove Development Constraints) tunes height, setbacks, and open-space ratios to match podium/wrap prototypes; 3H (AB 2097 Parking Near Transit) can right-size stalls where eligible; and 2O/2P (Lot Consolidation) allow coordinated phasing if adjoining pads participate. Adjacent corridor retail means daily needs remain walkable while the new residential edge calms turning movements and

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			strengthens safety for nearby neighborhoods. Comparable repositionings—The Mark Apartments (Riverside), Mission Heritage Plaza (Riverside), and Paloma at Main Place (Orange)—show how large, over-paved parcels transition successfully to housing with robust public-realm upgrades and lender-favored delivery scales.
213	012732145	155 E BASELINE AVE	COTTONWOOD MEADOW PROPERTIES L P	Community Commercial	C-1A	2.37	2.37	0	No	No	No	Yes	0	30	56	31	3	22	A prominent, corner-influenced site (~2.37 buildable acres) with shallow structures and outsized parking fields—a natural candidate for a podium or C-shaped courtyard plan that wraps the intersection with active frontages and internalizes parking/service. A single consolidated driveway, a corner forecourt, and a short paseo to the mid-block would repair the pedestrian edge, reduce conflict points, and set up a graceful massing step-down to adjacent residential. At the assumed density, the site accommodates 56 homes (31 lower-income). Feasibility is reinforced by 2B and 2R to capture intensity and incentives, with 4B modernizing dimensional/open-space and parking standards; 3H can right-size stalls where transit criteria apply. The adjacency mix—corridor services on Baseline, established homes to the rear—supports steady absorption and a gentle interface. Parallel conversions of high-visibility corners and large pads—Paloma at Main Place (Orange), Whittier Park Place (Whittier), and The Mark Apartments (Riverside)—demonstrate market acceptance for this format and the corridor-repair

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			benefits (fewer curb cuts, continuous canopy, safer crossings).
214	012726110	190 W BASELINE AVE	CLEAR MOUNTAIN PROPERTIES LP	Community Commercial	C-1A	0.73	0.73	0	No	No	No	Yes	0	30	17	9	1	7	A compact pad (~0.73 buildable acres) with a shallow building and surplus paving—classic auto-oriented geometry that can be right-sized into a 3–4 story stacked-flat or micro-podium with an addressable forecourt to Baseline and parking tucked inside. The program replaces multiple curb cuts with one controlled access, adds shade/lighting, and fills a streetwall gap, improving walking comfort and perceived safety. The adjacent residential fabric behind the corridor further eases compatibility, with massing able to step down at the rear and landscape buffering along lot lines. At the assumed density, the site accommodates 17 homes (9 lower-income). Programs 2B and 2R support yield and financing; 4B removes small-lot frictions (setbacks, coverage, open-space ratios); 3H can calibrate parking to demand where eligibility is met. Comparable small-pad transitions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—show how shallow, over-paved parcels can deliver efficient, context-sensitive housing that upgrades the corridor edge.
215	012732123	1149 N RIVERSIDE AVE	CHHANN, YOUNG	Community Commercial	C-1	0.73	0.73	0	No	No	No	Yes	0	30	17	9	1	7	An auto-oriented commercial pad with modest improvements and a high land-to-pavement ratio. At the assumed density, the site accommodates 17 homes (9 lower-income). About 0.73 acres enables a compact podium or 3–4 story stacked flats with internal parking and a Riverside-addressed forecourt, supporting corridor

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			reinvestment (fewer driveways, lighting, street trees) and complementing adjacent uses. Programs 2B/2R/4B are enabling; 3H can right-size parking. Appendix B's retail/parking conversions—Howard & Irene Levine (Los Angeles) and Paloma (Orange)—illustrate the same scale and geometry.
216	012732104	241 E BASELINE AVE	BUENA VISTA DEV LLC	Community Commercial	C-1A	1.74	1.74	0	No	No	No	Yes	0	30	41	23	2	16	A larger corner-influenced parcel with low site coverage and generous drive aisles. At the assumed density, the site accommodates 41 homes (23 lower-income). At 1.74 acres, a podium with internal circulation and a corner plaza can anchor the intersection, easing the transition to nearby neighborhoods and adding a walkable node of activity. Programs 2B, 2R, and 4B support intensity and modernized standards; 2H and 2O/2P can streamline and support assembly with adjacent pads if pursued. Appendix B flags Sites 213/216 as analogous to Whittier Park Place/Catalina (Whittier)—corners and auto pads successfully repositioned to housing.
217	012732103	241 E BASELINE AVE	BUENA VISTA DEV LLC	Community Commercial	C-1A	0.63	0.63	0	No	No	No	Yes	0	30	15	8	1	6	Companion parcel to the 216 corner, similarly over-paved with minimal structures—strong assembly potential but viable as a stand-alone infill. At the assumed density, the site accommodates 15 homes (8 lower-income). A three-story walk-up or micro-podium can address Baseline while sharing a mid-block drive; adjacency to corridor services and residential to the rear fosters compatibility and supports corridor streetscape gains. Programs 2B/2R/4B are primary tools; 2O/2P enhances

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			feasibility if combined with 216. Comparable small-pad infill includes Whittier Park Place (Whittier) and Howard & Irene Levine (Los Angeles).
218	012726116	120 W BASELINE AVE	BASELINE HJORRING FUND	Community Commercial	C-1A	0.51	0.51	0	No	No	No	Yes	0	30	12	7	1	4	Legacy restaurant pad with overscaled paving and driveways at a prominent stretch of Baseline. At the assumed density, the site accommodates 12 homes (7 lower-income). Half an acre supports a forecourt-style multifamily building with internalized parking and stoops along Baseline, improving pedestrian comfort and linking to nearby housing and shops. Programs 2B/2R/4B are core; 3H can reduce stall counts near transit. Appendix B's Paloma (Orange) and Whittier Park Place (Whittier) demonstrate similar conversions.
219	012731125	241 W BASELINE AVE	BAKER, NEAL T ENTERPRISES INC	Community Commercial	C-1	1.03	1.03	0	No	No	No	Yes	0	30	24	13	1	10	A one-acre commercial lot with broad surface parking and a single low-intensity use. At the assumed density, the site accommodates 24 homes (13 lower-income). Acreage supports a C-shaped courtyard or thin wrap with an emphasis on Baseline frontage, moderating speeds via consolidated driveways and enhanced street trees. Programs 2B/2R/4B increase feasibility; 2O/2P opens assembly with neighbors if needed. The feasibility pattern mirrors The Mark (Riverside) and Paloma (Orange)—big parking aprons converted to housing.
220	012731123	291 W BASELINE AVE	BAKER, NEAL T ENTERPRISES INC	Community Commercial	C-1	0.85	0.85	0	No	No	No	Yes	0	30	20	11	1	8	Corner-adjacent auto-oriented parcel with excess pavement and minimal structural value. At the assumed density, the site accommodates 20 homes (11 lower-income). Roughly 0.85 acres works for a compact podium

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			with a Baseline-facing plaza and internalized parking, tying into nearby residential blocks and improving the corridor's walkability. Programs 2B/2R/4B carry the entitlement/standards lift; 3H may reduce required parking if transit-proximate. Appendix B analogs—Paloma (Orange) and Whittier Park Place (Whittier)—underline the same delivery mechanics.
221	012725115	260 E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	0.80	0.80	0	No	No	No	Yes	0	30	19	10	1	8	A small, auto-oriented pad with a single commercial building and outsized surface parking is a textbook underbuilt site along the Baseline corridor. The parcel's depth and open paving enable a clean transition to housing with a forecourt or liner building addressing Baseline and resident parking tucked to the interior. At the assumed density, the site accommodates 19 homes (10 lower-income). Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) improve yield and economics; 4B (Remove Development Constraints) addresses legacy standards, and where eligible 3H (AB 2097 Parking Near Transit) right-sizes stalls. Adjacency to other Allied-owned pads (IDs 222–224) supports shared access and potential cross-easements, reducing curb cuts and improving pedestrian safety. New trees, lighting, and a defined street edge would knit this block into nearby neighborhoods and services. Comparable repositions of surplus retail parking to multifamily—Paloma at Main Place (Orange) and Howard & Irene Levine Senior Community (Los

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Angeles)—mirror this foreshadowed evolution and scale, validating feasibility in a corridor setting.
222	012725119	170 E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	0.69	0.69	0	No	No	No	Yes	0	30	16	9	1	6	Currently a restaurant use with a high parking ratio and large paved setbacks, the site reads as a low-coverage corner that can be recast as housing with an active frontage and internalized parking. At the assumed density, the site accommodates 16 homes (9 lower-income). Programs 2B/2R enable full residential buildout; 4B modernizes design/parking standards; 3H may reduce parking where transit proximity applies. Flanked by compatible commercial and nearby residential, new multifamily would shorten walking distances to daily needs and calm turning movements by consolidating driveways. Infill typologies used at Whittier Park Place / Catalina (Whittier) and The Mark Apartments (Riverside) show how shallow pads with surplus parking can be intensified without disrupting corridor trade, supporting lender-favored delivery scales.
223	012725120	118 E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	1.46	1.46	0	No	No	No	Yes	0	30	35	19	2	14	A deeper Allied-controlled parcel with a single structure and expansive parking fields, well-suited to a wrapped or podium configuration that presents a finished streetwall along Baseline while placing parking and open space internally. At the assumed density, the site accommodates 35 homes (19 lower-income). Programs 2B and 2R raise certainty and help close feasibility gaps; 4B trims entitlement friction. Taken with neighboring Allied pads, cross-access and phased delivery are realistic,

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			reducing incremental traffic friction and introducing shade, lighting, and pedestrian refuge where today there's asphalt. Precedents like Paloma at Main Place (Orange) and The Mark Apartments (Riverside) support the shift from large lots of excess parking to efficient multifamily in active corridors.
224	012725118	180 E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	0.80	0.80	0	No	No	No	Yes	0	30	19	10	1	8	Another restaurant/parking pad with minimal building coverage, ideal for compact infill. A 3–4-story stacked-flat building with a corner entry and stoops along Baseline can anchor the block, with shared access coordinated with adjacent Allied parcels. At the assumed density, the site accommodates 19 homes (10 lower-income). Programs 2B/2R and 4B support intensity and streamlined standards; 3H can calibrate parking near transit. The new frontage would reduce driveways, add canopy, and calm vehicular speeds—incrementally upgrading the pedestrian realm. Case studies—Howard & Irene Levine Senior Community (Los Angeles) and Paloma at Main Place (Orange)—illustrate the same parking-to-housing transition on shallow pads.
225	012725117	282 E BASELINE AVE	ALLIED FARMS INC	Community Commercial	C-1A	0.34	0.34	0	No	No	No	No	0	30	8	4	0	4	A narrow pad with a single commercial building and strip-parking geometry can convert to a small elevator-served apartment house or clustered townhomes, using an internal court for parking and trees. At the assumed density, the site accommodates 8 homes (4 lower-income). Programs 2B/2R improve feasibility at modest scale; 4B resolves setbacks and loading nuances; 3H may right-size parking.

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			Pairing driveway consolidation with a new sidewalk edge improves visibility for neighbors and softens an otherwise exposed block. Similar infill blocks replacing excess parking—Whittier Park Place / Catalina (Whittier)—show small sites can deliver quality, transit-proximate housing.
226	012725116	E BASELINE AVE	ALLIED FARMS INC	Community Commercial	C-1A	0.43	0.43	0	No	No	Yes	No	0	30	10	6	1	3	A vacant corner parcel surrounded by commercial pads and parking lots is inherently positioned for a gateway building with active frontage and enhanced corner treatment (plaza, public art, or shade grove). At the assumed density, the site accommodates 10 homes (6 lower-income). Programs 2B and 2R underwrite density; 4B removes minor dimensional constraints. Corner activation narrows crossing distances and organizes turning movements, improving safety for nearby homes and shoppers. As Appendix B notes, Sites 226–227 demonstrate the same high-probability conditions seen at Mission Heritage Plaza (Riverside)—marginal commercial or vacant corners repositioned to housing with supportive programs.
227	012725113	172 E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	7.61	7.61	0	No	No	No	Yes	0	30	182	100	9	73	A large Allied-controlled tract with one building and expansive parking, offering the rare scale for a full block-plan: internal drives, wrapped/structured parking, and multiple courtyards. At the assumed density, the site accommodates 182 homes (100 lower-income). Programs 2B and 2R reinforce intensity and financing; 2O/2P (Lot Consolidation) allow tie-ins with adjacent Allied holdings for phasing; 4B modernizes

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			standards; 3H can right-size parking if transit-eligible. New housing here would "stitch" the corridor—replacing sea-of-asphalt with shade, lighting, and frontage retail nooks while keeping key service retail nearby. Precedents—The Mark Apartments (Riverside) and Paloma at Main Place (Orange)—demonstrate large-lot strip commercial and parking fields converting successfully to multifamily at this delivery scale.
228	012725112	168 E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	4.23	4.23	0	No	No	No	Yes	0	30	101	56	5	40	A big-box store with outsized surface parking presents classic repositioning potential: phased pads, temporary shared parking, and ultimate conversion to wrapped or podium housing with activated corners. At the assumed density, the site accommodates 101 homes (56 lower-income). Programs 2B/2R and 4B backfill feasibility; 2O/2P could coordinate with adjacent Allied parcels; 3H may reduce stall counts near transit. The project would rationalize drive aisles, add shade canopy, and extend the pedestrian network to residential streets to the north/south, improving walkability and safety. Appendix B spotlights analogous big-box/parking conversions such as The Mark Apartments (Riverside), underscoring lender-favored scales and corridor fit.
229	012725114	E BASELINE RD	ALLIED FARMS INC	Community Commercial	C-1A	0.98	0.98	0	No	No	Yes	Yes	0	30	23	13	1	9	A corner site with vacant area adjacent to commercial and residential uses—an ideal "bridge" parcel to soften the transition between neighborhoods and shops. At the assumed density, the site accommodates 23 homes (13 lower-income). Programs 2B/2R support

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			entitlement and pro-formas; 4B addresses dimensional and frontage standards; 3H may adjust parking ratios. New homes would activate the corner, reduce curb cuts, and bring lighting/landscaping that calms speeds and elevates corridor comfort. Comparable repositioning of recreational/parking surfaces into apartments—Paloma at Main Place (Orange)—demonstrates market acceptance and deliverability.
230	012726115	1250 CONTRA AVE	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	0.64	0.64	0	No	No	No	Yes	0	30	15	8	1	6	A modest restaurant pad in the Baseline Shopping Center area with far more asphalt than building. A compact 3-story apartment building with a forecourt entry can deliver frontage definition while placing parking internally or in a mews. At the assumed density, the site accommodates 15 homes (8 lower-income). Programs 2B/2R lift intensity; 4B tackles legacy standards; 3H may calibrate parking. New street trees, fewer driveways, and lighting would tighten the block's fabric and improve day-to-day safety. Parallels with Whittier Park Place / Catalina (Whittier) and Howard & Irene Levine Senior Community (Los Angeles) show similar shallow pads repositioned to feasible infill housing.
231	012726113	150 W BASELINE RD	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	0.80	0.80	0	No	No	No	Yes	0	30	19	10	1	8	A compact, auto-oriented commercial pad with shallow building coverage and a disproportionately large parking apron—classic corridor underutilization that lends itself to a tidy infill prototype. At the assumed density, the site accommodates 19 homes (10 lower-income). On ~0.80 buildable acres, a 3–4 story stacked-

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			flat or small podium building can internalize parking, pull new frontage to Baseline, and add street trees/lighting where curb cuts dominate today. Adjacent neighborhood retail and established residential to the rear/side improve compatibility and support absorption, while consolidating driveways and adding a calmer sidewalk edge gives the Baseline corridor a measurable safety and visual upgrade. Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives), with Program 4B (Remove Development Constraints) addressing legacy standards and Program 3H (AB 2097 Parking Near Transit) enabling right-sized stalls where eligible. Comparable repositionings of shallow pads—Howard & Irene Levine Senior Community (Los Angeles) and The Plaza at Sierra (Fontana)—show how modest sites can deliver efficient, financeable housing while strengthening a corridor block face.
232	012726109	210 W BASELINE RD	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	3.67	3.67	0	No	No	No	Yes	0	30	88	48	4	36	A broad, underbuilt commercial frontage with low site coverage and expansive surface parking that functions more like a car court than a walkable edge. At the assumed density, the site accommodates 88 homes (48 lower-income). The ±3.67 buildable acres support a cost-efficient delivery scale favored by lenders—think a podium or wrap with two internal drives, a corner plaza, and a mid-block paseo to stitch in the surrounding neighborhood grid. Adjacencies—a mix of neighborhood

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			retail and established housing—make a well-scaled transition feasible; replacing multiple curb cuts with a single access point, street trees, and active corners would materially improve Baseline's comfort, safety, and visual continuity. Programs 2B and 2R provide the entitlement path and economic incentives; Program 4B streamlines standards (setbacks, open space, parking ratios) to unlock yield; and Program 3H can reduce parking where transit-adjacent. Precedents like Mission Heritage Plaza (Riverside) and The Mark Apartments (Riverside) demonstrate how wide parking fields and aging pads can flip to mid-density housing with strong public-realm outcomes.
233	012726106	290 CONTRA RD	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	3.67	3.67	0	No	No	No	Yes	0	30	88	48	4	36	A deep interior parcel with vestigial commercial/service use and oversized parking areas, creating low intensity at a well-connected neighborhood edge. At the assumed density, the site accommodates 88 homes (48 lower-income). The similar scale to ID-232 (±3.67 buildable acres) supports a full block-plan concept with a wrapped garage or podium, internal courtyards, and a greened edge along Contra that buffers adjacent homes. Introducing a pedestrian cut-through and calmer frontage (fewer driveways, more trees and lights) would repair a gap in the local network and reinforce a neighborhood center of gravity. Program 2B (rezoning) and Program 2R (incentives) pair with Program 4B (removing outdated standards) to right-size setbacks and parking, while Program 3H can further reduce parking

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			where transit criteria apply. Comparable conversions—Whittier Park Place (Whittier) and The Plaza at Sierra (Fontana)—show how underutilized interior pads can transition to multifamily while improving block permeability and edges.
234	012726114	122 CONTRA RD	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	1.43	1.43	0	No	No	No	Yes	0	30	34	19	2	13	A mid-sized lot with an aging, low-coverage commercial footprint and surplus paving—ideal conditions for a compact multifamily infill that respects adjacent residential scale. At the assumed density, the site accommodates 34 homes (19 lower-income). On ~1.43 buildable acres, a three- to four-story stacked-flat building with podium/surface hybrid parking can place active rooms toward Contra, step massing down at the rear, and add street trees and lighting to knit into nearby homes. Rationalizing driveways and introducing a small forecourt or corner pocket plaza would elevate walkability and calm traffic movements. Entitlement and economics benefit from Program 2B and Program 2R, while Program 4B addresses dimensional and parking standards; Program 3H can reduce parking ratios where transit proximity is met. Similar pad-to-housing transitions—Howard & Irene Levine Senior Community (Los Angeles) and Sierra Fountains Apartments (Fontana)—illustrate how modest sites can deliver high-quality infill and a cleaner neighborhood edge.
235	012726107	260 W BASELINE RD	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	1.82	1.82	0	No	No	No	Yes	0	30	43	24	2	17	An older commercial parcel with shallow building depth and a broad rear lot devoted to circulation and

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			stalls—typical of mid-century corridor retail now over-parked relative to demand. At the assumed density, the site accommodates 43 homes (24 lower-income). Roughly 1.82 buildable acres support a small podium or tuck-under flats with an internalized motor court, continuous shade canopy, and consolidated access that replaces multiple curb cuts. The adjacency pattern—services along Baseline and residential behind—supports a gentle height transition and creates opportunities for a neighborhood-serving corner (leasing café, pocket plaza) that upgrades the public realm. Programs 2B and 2R enable intensity and incentives; Program 4B streamlines height/parking/open-space standards to match prototypes; Program 3H can further right-size parking near transit. Case studies like Mission Heritage Plaza (Riverside) and The Mark Apartments (Riverside) reinforce the feasibility of repositioning over-paved retail sites into contextual housing that strengthens corridor continuity.
236	012726111	160 CONTRA RD	ABBEYFIELD PROPERTIES	Community Commercial	C-1A	1.10	1.10	0	No	No	No	Yes	0	30	27	15	1	11	A smaller interior lot marked by low site coverage and a high percentage of asphalt—an efficient candidate for a compact neighborhood multifamily building. At the assumed density, the site accommodates 27 homes (15 lower-income). On ~1.10 buildable acres, a three-story stacked-flat or townhome-over-flat configuration can buffer adjacent homes with setbacks and landscaping while framing Contra with an improved sidewalk, lighting, and canopy trees. Consolidating access

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			and adding a short mid-block paseo would enhance walkability and knit the site into nearby residential blocks. Program 2B (rezoning) plus Program 2R (incentives) underwrite the transition; Program 4B cures legacy site-planning constraints; and Program 3H can reduce required parking where eligible. Comparable infill on modest pads—Whittier Park Place (Whittier) and Howard & Irene Levine Senior Community (Los Angeles)—demonstrates market-tested feasibility at this scale with measurable neighborhood-edge benefits.
7 – Housing Opportunity Overlay																			
409	023930128	5111 LOCUST AVE	GREEN TREE INVESTMENT PARTNERS LLC	Community Commercial	NC	0.62	0.62	0	No	No	Yes	Yes	0	30	14	8	1	5	Mid-block vacant lot (~0.62 acres) at a residential edge—well-suited for a three-story stacked-flat with a shared rear mews, landscaped forecourt, and limited, screened parking. At the assumed density, the site accommodates 14 homes (8 lower-income). 2B/2R reinforce feasibility; 4B cleans up setbacks/open space for compact prototypes. Comparable right-sizing on modest parcels—Whittier Park Place (Whittier) and Howard & Irene Levine (Los Angeles)—demonstrates a gentle, context-aware scale.
410	023930129	3686 N RIVERSIDE AVE	GREEN TREE INVESTMENT PARTNERS LLC	Community Commercial	NC	3.85	3.85	0	No	No	Yes	Yes	0	30	92	52	3	37	A deep vacant frontage on Riverside (~3.85 acres) that wants a podium/wrap with internal circulation, multiple courtyards, and an activated street edge. Consolidating access points and adding shade/lighting would transform a car-dominant segment into a calmer corridor face while buffering nearby neighborhoods

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			with step-downs and landscape. At the assumed density, the site accommodates 92 homes (52 lower-income). Programs 2B/2R and 4B carry the entitlement and standards lift; 3H may reduce parking if transit-eligible. Similar corridor transformations—The Mark (Riverside) and Mission Heritage Plaza (Riverside)—support this block-scale concept.
411	023930146	5143 LOCUST AVE	GREEN TREE INVESTMENT PARTNERS LLC	Community Commercial	NC	1.09	1.09	0	No	No	Yes	No	0	30	9	5	1	3	Smaller vacant parcel (~1.09 acres) that can deliver a compact walk-up over parking with a Locust-facing forecourt and a rear green buffer to adjacent homes—simple, financeable, and neighbor-friendly. At the assumed density, the site accommodates 9 homes (5 lower-income). 2B/2R set the path to yield; 4B trims friction on microlot standards. Precedents like Whittier Park Place (Whittier) show how modest footprints can produce high-quality infill with a stronger street edge.
412	023930147	SEC W Locust Ave. and N Riverside Ave.	GREEN TREE INVESTMENT PARTNERS LLC	Community Commercial	NC	1.09	1.09	0	No	No	Yes	Yes	0	30	26	14	1	11	Corner-visible vacant site ideal for a courtyard or L-shaped podium that wraps the corner with entries, glass, and a small plaza, while internalizing parking and service. At the assumed density, the site accommodates 26 homes (14 lower-income). 2B/2R and 4B are the core levers; 3H can right-size stalls. Comparable corner/auto-pad conversions—Paloma at Main Place (Orange) and Whittier Park Place (Whittier)—illustrate the same visibility-driven feasibility.
413	026401258	SE of N. Riverside Ave.	LYTLE DEVELOPMENT COMPANY	Residential 6	R-1D	1.78	1.78	0	No	No	Yes	Yes	5.18	30	42	23	2	17	A multi-frontage vacant tract between major corridors—strong candidate for a podium with two internal drives, a

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
		and N. Linden Ave.																	mid-block paseo, and generous tree canopy to cool and calm the edge. At the assumed density, the site accommodates 42 homes (23 lower-income). Programs 2B/2R unlock intensity; 4B streamlines dimensional/parking standards; optional 2O/2P supports phased delivery. Analogs—The Mark (Riverside) and Mission Heritage Plaza (Riverside)—show corridor-adjacent tracts repositioned to neighborhood-serving housing.
414	113332121	North of Banyon St. & west of Cedar Ave.	CITY OF RIALTO	Public Facility	R-1B	5	5	0	No	Yes	Yes	Yes	5.18	30	120	67	5	48	A large, visible vacant site at a neighborhood gateway—ample room to organize a block-plan with clear pedestrian spines, pocket greens, and an activated corner while stepping massing toward existing homes. At the assumed density, the site accommodates 120 homes (67 lower-income). 2B/2R and 4B provide the regulatory/standards runway; 2O/2P can phase sub-areas; 3H reduces parking where transit-eligible. Comparable large-site transitions—Paloma at Main Place (Orange) and The Mark (Riverside)—demonstrate lender-favored delivery scales and strong corridor repair.
415	113321113	2314 N. Linden Ave.	DO DINH	Residential 6	R-1B	4.6	4.6	1	No	No	No	Yes	5.18	35	127	53	4	38	A deep, largely vacant tract with long Linden frontage and low existing coverage—ideal for a block-plan multifamily concept that organizes internal drives, courtyards, and a green perimeter to buffer nearby homes. A podium or slim wrap can bring doors and glazing to Linden while stepping massing toward residential edges. Streetscape upgrades (fewer curb cuts, trees, lighting) transform a car-

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			dominant edge into a walkable, neighborhood-supportive frontage. At the assumed density, the site accommodates 127 homes (53 lower-income). Programs 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) secure yield and economics; 4B (Remove Development Constraints) tunes height/parking/open-space standards; 3H (AB 2097 Parking Near Transit) can right-size stalls where eligible. Comparable repositionings of large paved tracts—The Mark (Riverside) and Paloma at Main Place (Orange)—show lender-favored delivery scales with strong corridor repair.
416	026421212	Area across Jerry Eaves Park & Cedar Avenue/Ayala Drive	REDEVELOPMENT AGENCY CITY OF RIALTO	Renaissance SP	School	4.87	4.87	0	No	Yes	Yes	Yes	5.18	30	116	64	6	46	A prominent multi-acre corner opposite a major park offers rare placemaking leverage: an activated corner plaza, a mid-block paseo linking to park paths, and a continuous residential edge that puts “eyes on the park.” Internalized circulation and amenity courts allow height to step down toward nearby homes, while consolidating multiple driveways improves safety and legibility at Cedar/Ayala. At the assumed density, the site accommodates 116 homes (64 lower-income). Programs 2B/2R underwrite intensity; 4B modernizes standards for a podium/wrap prototype; 3H can calibrate parking to demand; 2O/2P (Lot Consolidation) provide flexibility if adjacent pads are pursued together. Park-edge precedents—Mission Heritage Plaza (Riverside) and corridor conversions like Whittier Park Place (Whittier)—

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			demonstrate market acceptance for this visibility-driven housing type.
417	013320123	777 N. Acacia Ave.	BISHOP PROTESTANT EPISCOPAL CHURCH L	Residential 6	R-1B	3.26	3.26	0	Yes	No	No	Yes	3.12	35	91	20	2	15	A wide, underbuilt corridor parcel with a deep interior—well-suited to a courtyard or L-shaped podium that addresses Acacia with an active frontage, while tucking parking and services inside. A church property adjoining residential helps absorption and supports a step-down in height and landscape buffering at the rear. The project can replace scattered aprons with a single shared access and a shaded sidewalk spine, improving comfort and safety along Acacia. At the assumed density, the site accommodates 91 homes (20 lower-income). Programs 2B and 2R bolster entitlement and economics; 4B resolves dimensional frictions common to older commercial standards; 3H can reduce parking requirements if transit-proximate. Comparable corridor transitions—Sierra Fountains Apartments (Fontana) and The Mark (Riverside)—mirror this shift from over-paved frontage to context-sensitive housing.
418	013204168	249 E. Randall Ave.	CITY OF RIALTO	Residential 6	R-1C	0.5	0.5	0	Yes	Yes	Yes	Yes	3.12	30	12	6	1	5	A half-acre pad with minimal coverage and wide aprons—tailor-made for a 3-story walk-up or micro-podium with a landscaped forecourt to Randall and resident parking screened inside. As a near-neighbor to ID-419, it can share access, trash, and stormwater, raising net buildable area and creating a continuous sidewalk canopy across both frontages. At the assumed density, the site accommodates 12 homes (6 lower-income). Programs 2B/2R support yield; 4B streamlines

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			small-lot standards; 2O/2P enable joint planning with ID-419; 3H can right-size parking where criteria are met. Small paired infill examples—Whittier Park Place (Whittier)—show economies of repetition without sacrificing frontage quality.
419	013204169	249 E. Randall Ave.	GRACE BIBLE CHURCH	Residential 6	R-1C	1.06	1.06	0	Yes	No	Yes	Yes	0	30	25	14	1	10	The larger companion parcel to ID-418 offers enough depth (≈1.06 ac) for a compact podium or double-loaded bar with a central court and a single consolidated driveway serving both sites. Stepping massing and adding a planted buffer at the rear smooth the interface with adjacent homes, while continuous street trees and lighting upgrade the pedestrian realm along Randall. At the assumed density, the site accommodates 25 homes (14 lower-income). Programs 2B/2R and 4B increase feasibility; 2O/2P formalize shared access and utilities with ID-418; 3H can lower parking ratios where transit-proximate. Analogous right-sizing of small commercial pads—Nuevo Apartments (Pomona) and Whittier Park Place (Whittier)—confirms deliverability at this scale.
420	026401248	N LINDEN AVE	LYTLE CREEK LAND AND RESOURCES	R6	R-1B	5.58	5.58	0	Yes	No	Yes	Yes	5.18	30	133	73	7	53	A 5.58-acre vacant tract with long Linden exposure—squarely in the delivery zone for a full block-plan: podium or wrap buildings, internal drives, and multiple courtyards linked by shaded pedestrian mews. A pair of well-placed access points and an activated corner can transform a permeable, driveway-rich edge into a legible, walkable frontage that respects nearby residential with step-downs and landscape. At the assumed density, the site accommodates 133

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			homes (73 lower-income). Programs 2B/2R provide entitlement/incentives; 4B modernizes parking/open-space standards; 2O/2P can phase sub-areas if needed. Large-site precedents—The Mark (Riverside) and Paloma at Main Place (Orange)—illustrate the same move from surplus land to multifamily with robust public-realm upgrades.
421	023934113	2760 N LINDEN AVE	CUSHING, FRANK H JR	R6	R-1A	1.34	1.34	0	Yes	No	Yes	Yes	2.96	30	32	18	2	12	A mid-scale, vacant frontage (≈1.34 ac) that can carry a three- to four-story court building with internalized parking and a Linden-facing entry plaza. Consolidating curb cuts and adding canopy trees improve pedestrian comfort and slow turning movements; adjacent neighborhood fabric supports a gentle height transition and steady absorption. At the assumed density, the site accommodates 32 homes (18 lower-income). Programs 2B/2R backstop feasibility; 4B tunes small-to-mid-lot standards; 3H can right-size stalls. Comparable corridor infill—Sierra Fountains (Fontana) and Whittier Park Place (Whittier)—demonstrates market-tested prototypes at this acreage.
422	113328105	1475 W SUMMIT AVE	SAN GABRIEL VALLEY WATER COMPANY	R6	R-1B	2.54	2.54	0	Yes	No	Yes	Yes	5.18	30	60	33	3	24	A Summit Ave frontage with a large, underused field—strong candidate for a podium with an activated street edge, corner emphasis, and internalized circulation. The project can introduce a mid-block paseo and a shaded sidewalk, converting an auto-oriented segment into a walkable residential face that steps down to adjacent neighborhoods. At the assumed density, the site accommodates 60 homes (33 lower-income). Programs 2B/2R and 4B

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			provide the entitlement and standards runway; 2O/2P enable cross-access or phasing with adjacent parcels. Strip/pad conversions like The Mark (Riverside) and Paloma (Orange) confirm feasibility at this scale.
423	113328106	SUMMIT AVE	SAN GABRIEL VALLEY WATER COMPANY	R6	R-1B	2.49	2.49	0	Yes	No	Yes	Yes	5.18	30	59	32	3	24	The companion Summit pad (≈2.49 ac) can mirror 422's plan, sharing a single consolidated access and stormwater features while delivering a continuous streetwall and tree canopy. A corner plaza or forecourt can anchor the intersection and calm speeds. At the assumed density, the site accommodates 59 homes (32 lower-income). Programs 2B/2R and 4B lift intensity and clear legacy standards; 2O/2P strengthen feasibility if delivered with 422. Comparable paired-pad transformations—Paloma at Main Place (Orange) and Whittier Park Place (Whittier)—show the value of coordinated frontage design.
424	026401224	W SUMMIT	MUNOZ, ROSALYN RENEE LIV TR 3/11/19	R6	R-1B	0.45	0.45	0	Yes	No	Yes	No	5.18	30	10	6	1	3	A small, vacant infill (≈0.45 ac) that excels as a forecourt-style walk-up or micro-podium with stoops and a planted edge to Summit, keeping stalls internal or shared via a cross-access easement. Completing this frontage reduces driveways, stitches sidewalk gaps, and brings lighting/canopy to an exposed block. At the assumed density, the site accommodates 10 homes (6 lower-income). Programs 2B/2R and 4B streamline small-lot feasibility; 3H can reduce parking where transit criteria apply. Analogous small-pad infill—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			demonstrates deliverability with measurable corridor upgrades.
425	113309135	N Maple Ave	ALANIS, MICHAEL D	R6	R-1A	0.54	0.54	0	Yes	No	Yes	Yes	2.96	30	12	7	1	4	A shallow, auto-oriented frontage (~0.54 buildable acres) with low building coverage and outsized paving—prime for compact infill that pulls a clean streetwall to Maple. A three-story stacked-flat or micro-podium can internalize parking, trade multiple curb cuts for a single shared access, and add street trees/lighting to calm turning movements. The residential fabric to the rear/side supports a gentle height step-down and strong absorption. At the assumed density, the site accommodates 12 homes (7 lower-income). Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and Program 2R (Residential Incentives), with Program 4B (Remove Development Constraints) tuning setbacks/open space/parking for tight parcels; where eligible, Program 3H (AB 2097 Parking Near Transit) right-sizes stalls. Comparable small-pad transitions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—demonstrate a proven, lender-friendly prototype at this scale.
426	113310112	1678 W PERSIMMON ST	GARNICA, ALEJANDRO GARCIA	R6	R-1A	0.23	0.23	0	Yes	No	Yes	No	2.96	30	5	3	0	2	A petite, mid-block parcel (~0.23 acres) with legacy commercial geometry—ideal for a duplex-over-flat or 3-story walk-up with a landscaped forecourt to Persimmon and screened parking at the rear. The format closes a frontage gap, consolidates driveways, and strengthens a residential edge already present on the block. At the assumed density, the site accommodates 5

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			homes (3 lower-income). Programs 2B/2R secure yield and incentives, while Program 4B resolves small-lot design and loading details; Program 3H can reduce stall counts if transit criteria apply. Similar "micro-pad to missing-middle" conversions at Whittier Park Place (Whittier) show how repetition of a compact plan can deliver quality infill without overengineering.
427	113328102	LINDEN AVE	FLORES FRANCISCO J	R6	R-1B	0.39	0.39	0	Yes	No	Yes	No	5.18	30	9	5	0	4	A vacant narrow corridor pad (~0.39 acres)—textbook for a slim podium or walk-up with stoops and a small entry court facing Linden, plus a single, consolidated driveway. Introducing canopy trees, lighting, and a continuous sidewalk would convert a car-dominant frontage to a comfortable residential edge. At the assumed density, the site accommodates 9 homes (5 lower-income). Program 2B (rezoning) and Program 2R (incentives) underwrite feasibility; Program 4B trims dimensional friction; Program 3H can right-size parking. Corridor precedents—Sierra Fountains Apartments (Fontana) and Whittier Park Place (Whittier)—confirm market acceptance for a context-sensitive, small-pad prototype.
428	113310130	N LINDEN AVE	PRAGAT UMIYA LLC	R6	R-1A	0.34	0.34	0	Yes	No	Yes	No	2.96	30	8	4	0	4	Another shallow frontage (~0.34 acres) that can mirror a three-story stacked-flat with an addressable entry on Linden and a quiet rear mews. Pairing curb consolidation with new trees and lighting upgrades safety and walkability, while adjacency to established homes supports a gentle massing transition. At the assumed

Table B-20: Sites Inventory by Opportunity Area

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			density, the site accommodates 8 homes (4 lower-income). Programs 2B/2R provide yield and financing support; 4B modernizes small-lot standards; 3H can reduce required parking if transit-proximate. Comparable transformations of small pads—Whittier Park Place (Whittier) and Howard & Irene Levine (Los Angeles)—illustrate efficient delivery at this size.
429	013002321	354 N WILLOW AVE	FOOTHILL 305 LLC	Residential 21	C-3	0.139	0.139	0	No	No	Yes	No	0	30	3	2	0	1	A micro-parcel (~0.139 acres) functioning today as an exposed sliver—best suited to a compact tri-plex/stacked-flat or duplex-over-flat with a tiny forecourt and one consolidated access point. The move replaces vacant land with doors, stoops, and trees, stitching a missing piece of streetwall and improving perceived safety and comfort along Willow. At the assumed density, the site accommodates 3 homes (2 lower-income). Program 2B and 2R keep the prototype viable despite small size; 4B tailors setbacks and frontage details to a microlot; 3H helps right-size parking where criteria are met. Micro-site precedents—Howard & Irene Levine (Los Angeles) and infill at Whittier Park Place (Whittier)—show that even tiny remnants can deliver meaningful units when paired with streetscape upgrades.
430	013002341	305 W FOOTHILL BLVD	FOOTHILL 305 LLC	General Commercial	C-P	0.141	0.141	0	No	No	Yes	No	0	30	3	2	0	1	A micro infill parcel (≈0.14 buildable acres) with a shallow, auto-oriented frontage and oversized apron—exactly the geometry that rewards a tiny, high-efficiency prototype. A duplex-over-flat or tri-plex/stacked-flat with a small forecourt and a single consolidated

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			driveway can replace exposed paving with doors, stoops, and shade trees, tightening the Foothill edge while keeping impacts modest for adjacent homes. At the assumed density, the site accommodates 3 homes (2 lower-income). Feasibility is reinforced by Program 2B (Rezone to Provide Adequate Sites) and 2R (Residential Incentives) to capture full residential yield, with 4B (Remove Development Constraints) tuning setbacks, frontage elements, and compact open-space ratios. Where criteria are met, 3H (AB 2097 Parking Near Transit) lets stalls match actual demand, and a shared or district parking strategy can further right-size on micro-sites. Comparable small-pad conversions—Howard & Irene Levine Senior Community (Los Angeles) and Whittier Park Place (Whittier)—show how tiny remnants can deliver missing-middle housing while upgrading corridor comfort and safety. Parcel adjacent to other vacant lots. Sites 429-431 are within the recently adopted Foothill Central Specific Plan.
431	013002339	303 W FOOTHILL BLVD	FOOTHILL 305 LLC	General Commercial	C-P	0.218	0.218	0	No	No	Yes	No	0	30	5	3	0	2	Slightly larger (≈0.22 buildable acres) but with the same shallow frontage, this companion lot supports a 3-story stacked-flat or micro-podium with an addressable entry on Foothill and parking screened to the rear. If coordinated with ID-430, shared access, trash, and stormwater can lift net buildable area and present a continuous sidewalk canopy—trading multiple curb cuts for one safe, legible entry. At the assumed density, the site accommodates 5 homes (3 lower-

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ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unit Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			income). Programs 2B/2R secure yield and incentives; 4B resolves microlot dimensional frictions; 2O/2P (Lot Consolidation) formalize a joint plan with 305 W Foothill; 3H can reduce parking where transit-proximate. Precedents such as Whittier Park Place (Whittier) and Nuevo Apartments (Pomona) demonstrate the same "small pad → efficient multifamily" move at corridor edges.
432	013004317	217 E FOOTHILL BLVD	NUNEZ JAMES A	General Commercial	C-P	0.176	0.176	0	No	No	Yes	No	0	30	4	2	0	2	Another thin Foothill parcel (≈0.18 buildable acres) with no structural value. A forecourt-style walk-up—stoops and active rooms to the street, tuck-under or screened stalls behind—can repair the streetwall, calm turning movements via driveway consolidation, and add lighting/trees for a safer, more walkable frontage. At the assumed density, the site accommodates 4 homes (2 lower-income). Program 2B (rezoning) and 2R (incentives) underpin feasibility; 4B tailors setbacks, frontage, and open-space for small prototypes; 3H may right-size parking. Comparable small-frontage transformations—Howard & Irene Levine (Los Angeles) and Whittier Park Place (Whittier)—prove out delivery at this scale with meaningful corridor upgrades.
433	013006128	EUCALYPTUS AVE	711 NORTH AZUSA LLC	General Commercial	C-MU	2.63	2.63	0	No	No	Yes	No	0	30	63	35	3	25	A substantially larger opportunity (≈2.63 buildable acres) with long Eucalyptus frontage and a deep interior, functioning today as low-coverage land with outsized hardscape. The scale supports a podium or slim wrap with two internal drives, multiple courtyards, and a green perimeter that steps massing

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			down toward adjacent single-family. A corner forecourt or mid-block paseo can consolidate curb cuts into one controlled access, improving legibility and safety while activating the pedestrian edge with doors, glazing, and shade canopy. At the assumed density, the site accommodates 63 homes (35 lower-income). Programs 2B and 2R firm up entitlement and economics; 4B modernizes parking/open-space ratios and height transitions; 3H can calibrate stalls where transit-adjacent. Analogous big-apron conversions—The Mark (Riverside) and Paloma at Main Place (Orange)—illustrate lender-favored delivery scales with robust public-realm benefits.
434	013031203	205 S DATE ST	SPRINT COMMUNICATIONS CO	Residential 21	C-C	2.48	2.48	0	No	No	Yes	No	0	30	59	32	3	24	A neighborhood-scale tract (≈2.48 buildable acres) set back from the primary corridor—ideal for a quiet, block-plan multifamily with internal circulation, generous tree canopy, and a small pocket plaza or tot-lot addressing Date Street. The plan can place active rooms and stoops to the street while stepping massing near existing homes, using setbacks and landscaping to soften the interface. A single consolidated driveway and short pedestrian mews would repair local connectivity and replace fragmented curb cuts with a continuous sidewalk edge. At the assumed density, the site accommodates 59 homes (32 lower-income). Feasibility is strengthened by Program 2B (rezoning) and 2R (incentives), with 4B tuning dimensional standards and parking to prototype; 3H can reduce parking

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													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			where criteria are met. Comparable neighborhood-edge transitions—Mission Heritage Plaza (Riverside) and Sierra Fountains Apartments (Fontana)—confirm the market for right-sized multifamily that upgrades block edges and walkability.

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
Lytle Creek Specific Plan																			

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
243	023918102	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	OS/JU	Lytle Creek Ranch Specific Plan	3.76	3.76	0	No	No	Yes	Yes	2.96	N/A	13	0	1	12	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
244	023918103	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	SFR-3	Lytle Creek Ranch Specific Plan	6.13	6.13	0	No	No	Yes	Yes	2.96	N/A	22	0	2	20	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
245	023918116	3511 RIVERSIDE AVE	BORAL ROOFING LLC	VC	Lytle Creek Ranch Specific Plan	8.99	8.99	0	No	No	No	Yes	2.96	N/A	33	0	3	30	The Site is currently developed with industrial uses and a parking lot. Parking and undeveloped space takes up a significant portion of the lot, which could be used to provide more dwelling units to the City. Since the use is marginal, the probability of development is high.
246	023918118	RIVERSIDE AVE	LYTLE DEVELOPMENT COMPANY	VC	Lytle Creek Ranch Specific Plan	11.58	11.58	0	No	No	No	No	2.96	N/A	42	0	4	38	Vacant lot. Adjacent to other vacant properties, industrial building materials storage, and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
247	023918110	N/A	SAN GABRIEL VALLEY MUNICIPAL WATER D	OS/R	Lytle Creek Ranch Specific Plan	0.51	0.51	0	No	No	Yes	Yes	2.96	N/A	2	0	0	2	Vacant lot. Adjacent to other vacant properties, industrial building materials storage, and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
248	023918117	RIVERSIDE AVE	LYTLE DEVELOPMENT COMPANY	SFR-3	Lytle Creek Ranch Specific Plan	7.74	7.74	0	No	No	Yes	Yes	2.96	N/A	29	0	3	26	Vacant lot. Adjacent to other vacant properties and industrial building materials storage. This property is being developed as a portion of Lytle Creek Specific Plan.
249	023918112	N/A	METROPOLITAN WATER DIST OF SO CALIF	OS/R	Lytle Creek Ranch Specific Plan	1.47	1.47	0	No	No	Yes	Yes	2.96	N/A	6	0	1	5	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
250	023911115	RIVERSIDE AVE	LYTLE DEVELOPMENT COMPANY	OS	Lytle Creek Ranch Specific Plan	28.33	28.33	0	No	No	Yes	No	2.96	N/A	104	0	10	94	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
251	023911112	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	MFR	Lytle Creek Ranch Specific Plan	105.00	105.00	0	No	No	Yes	No	2.96	N/A	385	0	38	347	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
252	023912106	N/A	LYTLE CREEK LAND AND RESOURCES	MFR	Lytle Creek Ranch Specific Plan	27.09	27.09	0	No	No	Yes	No	2.96	N/A	100	0	10	90	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
253	023911111	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	SFR-1	Lytle Creek Ranch Specific Plan	29.93	29.93	0	No	No	Yes	No	2.96	N/A	110	0	11	99	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
254	023918101	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	ES/MS	Lytle Creek Ranch Specific Plan	4.25	4.25	0	No	No	Yes	Yes	2.96	N/A	16	0	2	14	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
255	023909428	N/A	LYTLE CREEK LAND AND RESOURCES	HDR	Lytle Creek Ranch Specific Plan	6.70	6.70	0	No	No	Yes	Yes	2.96	N/A	24	0	2	22	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
256	023909431	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	HDR	Lytle Creek Ranch Specific Plan	100.00	100.00	0	No	No	Yes	No	2.96	N/A	368	0	37	331	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
257	023911108	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	SFR-2	Lytle Creek Ranch Specific Plan	7.67	7.67	0	No	No	Yes	Yes	2.96	N/A	28	0	3	25	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
258	023909429	N/A	LYTLE CREEK LAND AND RESOURCES	VC	Lytle Creek Ranch Specific Plan	1.38	1.38	0	No	No	Yes	Yes	2.96	N/A	6	0	1	5	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
259	023909432	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	VC	Lytle Creek Ranch Specific Plan	22.86	22.86	0	No	No	Yes	No	2.96	N/A	84	0	8	76	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
260	023909440	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	VC	Lytle Creek Ranch Specific Plan	1.36	1.36	0	No	No	Yes	Yes	2.96	N/A	4	0	0	4	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
261	026403221	N/A	MORGAN, STEVEN G SEPARATE PROP TR 3/	HDR	Lytle Creek Ranch Specific Plan	4.15	4.15	0	No	No	Yes	Yes	2.96	N/A	16	0	2	14	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
262	026401131	N/A	METROPOLITAN WATER DIST OF SO CALIF	HDR	Lytle Creek Ranch Specific Plan	2.35	2.35	0	No	No	Yes	Yes	2.96	N/A	9	0	1	8	Vacant lot with a road leading to an industrial site with building material storage. Adjacent to vacant properties, building materials storage, and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
263	026401134	N/A	LYTLE CREEK LAND AND RESOURCES	HDR	Lytle Creek Ranch Specific Plan	3.44	3.44	0	No	No	Yes	Yes	2.96	N/A	12	0	1	11	Vacant lot with a road leading to an industrial site with building material storage. Adjacent to vacant properties, building materials storage, and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
264	026401132	N/A	METROPOLITAN WATER DIST OF SO CALIF	VC	Lytle Creek Ranch Specific Plan	1.62	1.62	0	No	No	Yes	Yes	2.96	N/A	6	0	1	5	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
265	026401125	N/A	SOUTHERN CALIFORNIA EDISON COMPANY	VC	R-1A	1.28	1.28	0	Yes	No	Yes	Yes	2.96	N/A	4	0	0	4	Vacant lot. Adjacent to other vacant properties and utilities. This property is being developed as a portion of Lytle Creek Specific Plan.
266	026401126	N/A	SOUTHERN CALIFORNIA EDISON COMPANY	VC	Lytle Creek Ranch Specific Plan	3.93	3.93	0	Yes	No	No	Yes	2.96	N/A	14	0	1	13	The Site is currently developed with two small structures and a parking lot and is surrounded by vacant land. Parking and undeveloped space takes up a significant portion of the lot, which could be used to provide more dwelling units to the City. Since the use

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			is marginal, the probability of development is high.
267	026401136	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	VC	Lytle Creek Ranch Specific Plan	3.23	3.23	0	No	No	Yes	Yes	2.96	N/A	12	0	1	11	Vacant lot. Adjacent to other vacant properties, utilities, and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
268	026401135	N/A	FONTANA UNION WATER COMPANY	SFR-1	Lytle Creek Ranch Specific Plan	1.45	1.45	0	Yes	No	No	Yes	2.96	N/A	6	0	1	5	The Site is currently developed with one small structure, a water treatment pool and a parking lot and is surrounded by vacant land. Parking and undeveloped space takes up a significant portion of the lot, which could be used to provide more dwelling units to the City. Since the use is marginal, the probability of development is high.
269	026442136	N/A	EL RANCHO VERDE GOLF LLC	SFR-1	Lytle Creek Ranch Specific Plan	0.56	0.56	0	No	No	Yes	Yes	2.96	N/A	2	0	0	2	Vacant property. Adjacent to other vacant lots, residential neighborhoods, and materials excavating. This property is being developed as a portion of Lytle Creek Specific Plan.
270	023912119	RIVERSIDE AVE	LYTLE DEVELOPMENT COMPANY	MFR	Lytle Creek Ranch Specific Plan	94.01	94.01	0	No	No	Yes	No	11.2	N/A	345	0	34	311	Vacant property. Adjacent to other vacant lots and materials excavating. This property is being developed as a portion of Lytle Creek Specific Plan.
271	023912123	N/A	LYTLE DEVELOPMENT COMPANY	OS	Lytle Creek Ranch Specific Plan	269.07	269.07	0	No	No	Yes	No	0	N/A	988	0	98	890	Vacant property. Adjacent to other vacant lots, residential neighborhoods, and materials excavating. This property is being developed as a portion of Lytle Creek Specific Plan.
272	023909437	N/A	SOUTHERN CALIFORNIA EDISON COMPANY	OS/R	Lytle Creek Ranch Specific Plan	7.05	7.05	0	No	No	Yes	Yes	0	N/A	26	0	3	23	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
273	023909438	N/A	SOUTHERN CALIFORNIA EDISON COMPANY	OS/R	Lytle Creek Ranch Specific Plan	0.83	0.83	0	No	No	Yes	Yes	0	N/A	3	0	0	3	Vacant lot with an electric line tower. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
274	023909439	N/A	SOUTHERN CALIFORNIA EDISON COMPANY	OS/R	Lytle Creek Ranch Specific Plan	7.94	7.94	0	No	No	Yes	Yes	0	N/A	29	0	3	26	Vacant lot. Adjacent to other vacant properties. This property is being

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			developed as a portion of Lytle Creek Specific Plan.
275	026401119	N/A	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	5.14	5.14	0	No	No	Yes	Yes	0	N/A	19	0	2	17	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
276	026442121	N/A	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	5.88	5.88	0	No	No	Yes	Yes	0	N/A	21	0	2	19	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
277	026442120	N/A	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	4.26	4.26	0	No	No	Yes	Yes	0	N/A	16	0	2	14	Vacant lot. Adjacent to other vacant properties and water tanks. This property is being developed as a portion of Lytle Creek Specific Plan.
278	026442117	N/A	LYTLE DEVELOPMENT COMPANY	OS/R	Lytle Creek Ranch Specific Plan	2.92	2.92	0	No	No	Yes	Yes	0	N/A	11	0	1	10	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
279	026203112	N/A	LYTLE CREEK LAND AND RESOURCES	SFR-3	Lytle Creek Ranch Specific Plan	23.45	23.45	0	No	No	Yes	No	0	N/A	87	0	9	78	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
280	026442109	N/A	SAN BERNARDINO CO FLOOD CONTROL DIST	OS/R	Lytle Creek Ranch Specific Plan	19.77	19.77	0	No	No	Yes	No	0	N/A	72	0	7	65	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
281	026401122	N/A	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	0.93	0.93	0	No	No	Yes	Yes	0	N/A	3	0	0	3	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
282	026401110	RIVERSIDE AVE	LYTLE CREEK LAND AND RESOURCES	SFR-2	Lytle Creek Ranch Specific Plan	6.28	6.28	0	No	No	Yes	Yes	0	N/A	23	0	2	21	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
283	026442118	N/A	LYTLE DEVELOPMENT COMPANY	OS/R	Lytle Creek Ranch Specific Plan	11.06	11.06	0	No	No	Yes	No	0	N/A	41	0	4	37	Vacant lot and utilities. Adjacent to vacant properties. This property is

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			being developed as a portion of Lytle Creek Specific Plan.
284	026203106	N/A	LYTLE CREEK LAND AND RESOURCES	SFR-3	Lytle Creek Ranch Specific Plan	5.19	5.19	0	No	No	Yes	Yes	0	N/A	19	0	2	17	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
285	026207128	N/A	LYTLE CREEK LAND AND RESOURCES	SFR-3	Lytle Creek Ranch Specific Plan	57.94	57.94	0	No	No	Yes	No	11.2	N/A	213	0	21	192	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
286	026442106	N/A	SAN BERNARDINO CO FLOOD CONTROL DIST	OS/R	Lytle Creek Ranch Specific Plan	1.70	1.70	0	No	No	Yes	Yes	0	N/A	7	0	1	6	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
287	026207142	N/A	LYTLE CREEK LAND AND RESOURCES	OS/R	Lytle Creek Ranch Specific Plan	2.54	2.54	0	No	No	Yes	Yes	0	N/A	9	0	1	8	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
288	026207141	N/A	LYTLE CREEK LAND AND RESOURCES	VC	Lytle Creek Ranch Specific Plan	0.20	0.20	0	No	No	Yes	No	0	N/A	1	0	0	1	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
289	026207139	N/A	LYTLE CREEK LAND AND RESOURCES	SFR-2	Lytle Creek Ranch Specific Plan	45.41	45.41	0	No	No	Yes	No	0	N/A	167	0	17	150	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
290	026442130	N/A	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	1.65	1.65	0	No	No	Yes	Yes	0	N/A	6	0	1	5	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
291	026442112	N SYCAMORE AVE	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	9.34	9.34	0	No	No	Yes	Yes	0	N/A	34	0	3	31	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
292	026207115	N/A	LYTLE CREEK LAND AND RESOURCES	OS	Lytle Creek Ranch Specific Plan	337.60	337.60	0	No	No	Yes	No	6.4	N/A	1,240	0	123	1117	Vacant lot. Adjacent to other vacant properties. This property is being

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
																			developed as a portion of Lytle Creek Specific Plan.
293	026207131	N/A	LYTLE CREEK LAND AND RESOURCES	SFR-3	Lytle Creek Ranch Specific Plan	57.74	57.74	0	No	No	Yes	No	11.2	N/A	212	0	21	191	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
294	026442126	N/A	CITY OF RIALTO	OS/R	Lytle Creek Ranch Specific Plan	2.00	2.00	0	No	Yes	Yes	Yes	28	N/A	8	0	1	7	Vacant lot and utilities. Adjacent to vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
295	026478112	N SYCAMORE AVE	EL RANCHO VERDE GOLF LLC	OS/R	Lytle Creek Ranch Specific Plan	3.27	3.27	0	No	No	Yes	Yes	0	N/A	12	0	1	11	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
296	111601215	N/A	LYTLE DEVELOPMENT COMPANY	Open Space	Lytle Creek Ranch Specific Plan	166.18	166.18	0	No	No	Yes	No	2.96	N/A	611	0	61	550	Vacant lot. Adjacent to other vacant properties and residential neighborhoods. This property is being developed as a portion of Lytle Creek Specific Plan.
297	023912120	3511 RIVERSIDE AVE	BORAL ROOFING LLC	VC	Lytle Creek Ranch Specific Plan	19.28	19.28	0	No	No	No	No	0	N/A	71	0	7	64	The Site is currently developed with industrial uses and parking lot. Parking and undeveloped space takes up a significant portion of the lot, which could be used to provide more dwelling units to the City. Since the use is marginal, the probability of development is high. According to the assessor's parcel data, the improvement rate is 16 percent.
298	026442132	N/A	LYTLE DEVELOPMENT COMPANY	OS/R	Lytle Creek Ranch Specific Plan	4.07	4.07	0	No	No	Yes	Yes	0	N/A	14	0	1	13	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Lytle Creek Specific Plan.
299	026442135	N/A	EL RANCHO VERDE GOLF LLC	SFR-3	Lytle Creek Ranch Specific Plan	134.59	134.59	0	No	No	No	No	0	N/A	494	0	49	445	The Site currently houses abandoned structures and paved land. Undeveloped space takes up a significant portion of the lot, which could be used to provide more dwelling units to the City. Since the use is marginal, the probability of development is high.

Table B-21: Sites Inventory by Entitled Specific Plan

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
Renaissance Specific Plan																			
300	026415175	N/A	CITY OF RIALTO	HDR	Renaissance Specific Plan	4.29	4.29	0	No	City Owned	No	Yes	0	30	78	0	25	53	The Site is currently developed with two small structures and undeveloped land. Undeveloped space takes up a significant portion of the lot, which could be used to provide more dwelling units to the City. Since the use is marginal, the probability of development is high.
301	026415184	N/A	CITY OF RIALTO	MDR	Renaissance Specific Plan	7.30	7.30	0	No	City Owned	Yes	Yes	0	30	133	0	42	91	Vacant lot. Adjacent to other vacant properties and a strip mall. This property is being developed as a portion of Renaissance Specific Plan.
302	026415162	PALM AVE	CITY OF RIALTO	MDR	Renaissance Specific Plan	4.81	4.81	0	No	City Owned	Yes	Yes	0	30	88	0	28	60	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Renaissance Specific Plan.
303	026415174	N/A	CITY OF RIALTO	Utilities	Renaissance Specific Plan	2.33	2.33	0	No	City Owned	No	Yes	0	30	42	0	13	29	Fire station. Adjacent to vacant lots. This property is being developed as a portion of Renaissance Specific Plan.
304	026415186	N/A	CITY OF RIALTO	HDR	Renaissance Specific Plan	5.72	5.72	0	No	City Owned	Yes	Yes	0	30	104	0	33	71	Vacant lot. Adjacent to other vacant properties. This property is being developed as a portion of Renaissance Specific Plan.
305	026415153	LINDEN AVE	CITY OF RIALTO	LDR	Renaissance Specific Plan	19.45	19.45	0	No	City Owned	Yes	No	0	30	354	0	112	242	Vacant lot. Adjacent to other vacant properties and industrial warehouse uses. This property is being developed as a portion of Renaissance Specific Plan.
306	026415182	N/A	CITY OF RIALTO	MHDR	Renaissance Specific Plan	26.37	26.37	0	No	City Owned	Yes	No	0	30	480	0	152	328	Vacant lot. Adjacent to other vacant properties, a strip mall, and industrial warehouse uses. This property is being developed as a portion of Renaissance Specific Plan.

Table B-22: Sites Inventory by Pipeline Projects

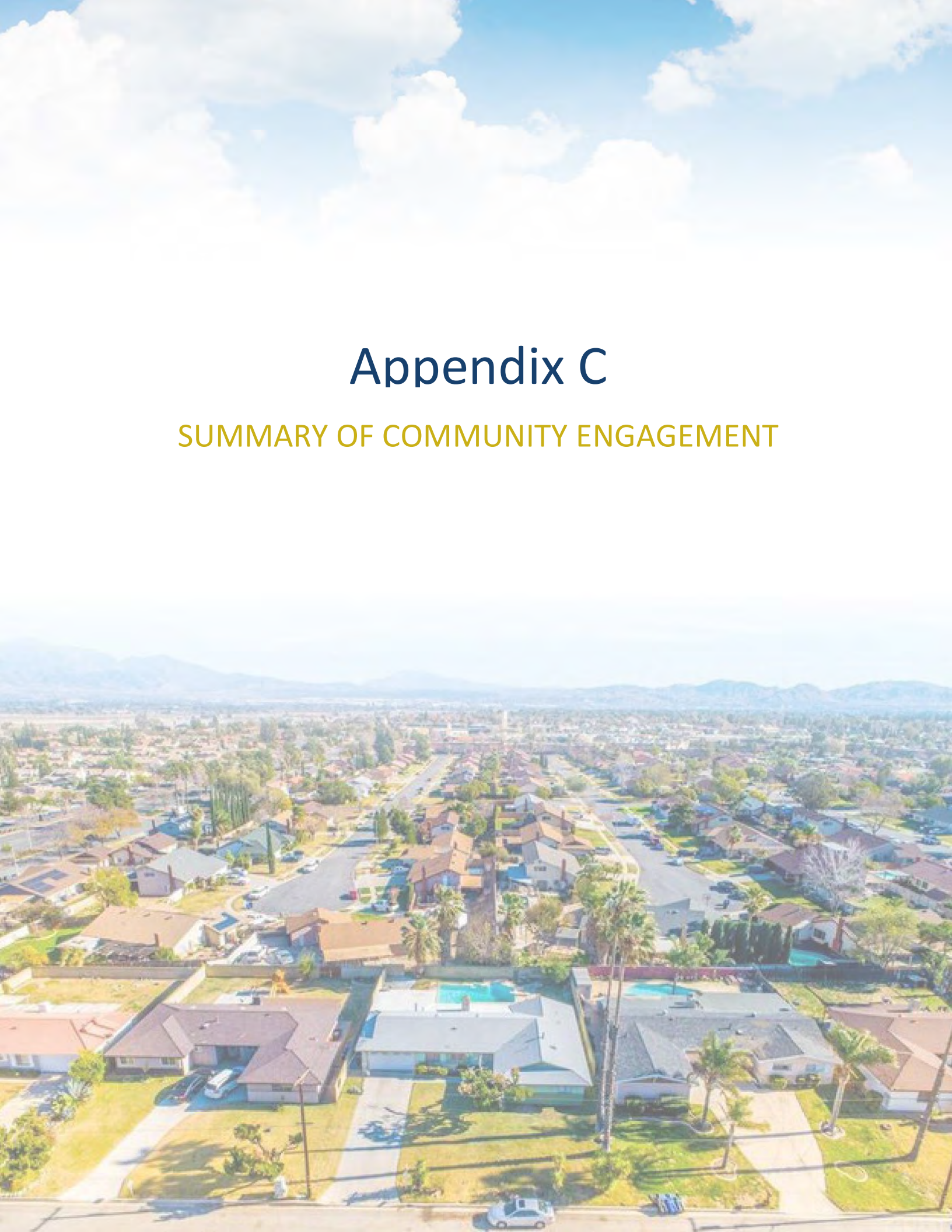
ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
307	025009125	N/A	MV AMCV LLC	Residential 6	R-1C	1.42	1.42	0	Yes	No	Yes	Yes	3.12	N/A	11	0	0	11	A development proposal on this site is currently being processed by the City. The Cedar Villas project proposed on this site has LUS approval with pending building permits.
308	025009126	N/A	MV AMCV LLC	Residential 6	R-1C	1.50	1.50	0	Yes	No	Yes	Yes	3.12	N/A	11	0	0	11	A development proposal on this site is currently in processing with the City. The Cedar Villas project proposed on this site has LUS approval with pending building permits.
309	012807109	FOOTHILL BLVD	RIALTO FOOTHILL INVESTMENT LLC	Residential	Foothill Boulevard Specific Plan	3.85	3.85	0	Yes	No	Yes	Yes	30	N/A	60	0	0	60	A development proposal on this site is currently being processed by the City. The Foothill & Larch residential development proposed on this site has submitted a LUS application.
310	012807102	FOOTHILL	RIALTO FOOTHILL INVESTMENT LLC	Residential	Foothill Boulevard Specific Plan	0.29	0.29	0	Yes	No	Yes	No	1 unit	N/A	4	0	0	4	A development proposal on this site is currently being processed by the City. The Foothill & Larch residential development proposed on this site has submitted a LUS application.
311	012807103	FOOTHILL BLVD	RIALTO FOOTHILL INVESTMENT LLC	Residential	Foothill Boulevard Specific Plan	0.40	0.40	0	Yes	No	Yes	No	1 unit	N/A	6	0	0	6	A development proposal on this site is currently being processed by the City. The Foothill & Larch residential development proposed on this site has submitted a LUS application.
312	013102140	BONNIE VIEW DR	RIALTO HOUSING AUTHORITY	Downtown Mixed-Use	Rialto Central Area Specific Plan	1.26	1.26	0	No	No	Yes	Yes	0	N/A	55	0	0	55	A development proposal on this site is currently being processed by the City. The Metrolink South project on this parcel has LUS approval.
313	013102136	BONNIE VIEW DR	RBV INVESTMENT GROUP LLC	Residential 21	Rialto Central Area Specific Plan	0.87	0.87	0	Yes	No	Yes	Yes	0	N/A	56	0	0	56	A development proposal on this site is currently being processed by the City. The Belloro project on this parcel has LUS approval.
314	012805140	N/A	CENTURY COMMUNITIES OF CALIFORNIA LL	Residential	Foothill Boulevard Specific Plan	0.80	0.80	0	No	No	Yes	Yes	1 unit	N/A	10	0	0	10	The Century Communities development is currently under construction on this parcel.
315	012805139	N/A	CENTURY COMMUNITIES OF CALIFORNIA LL	Residential	Foothill Boulevard Specific Plan	0.80	0.80	0	No	No	Yes	Yes	1 unit	N/A	10	0	0	10	The Century Communities development is currently under construction on this parcel.

Table B-22: Sites Inventory by Pipeline Projects

ID	APN	Address	Owner	Existing General Plan Land Use	Existing Zoning	Gross Acreage	Buildable Acreage	Existing Units	5th Cycle Site	City Owned	Vacancy	HCD Sizing Criteria	Density (DU/AC)		Potential Net Unit Yield	Potential New Unity Yield			Notes
													Existing Zone Density	Rezoned/ Upzoned Density		Very Low/ Low	Moderate	Above Moderate	
316	012805142	N/A	CENTURY COMMUNITIES OF CALIFORNIA LL	Residential	Foothill Boulevard Specific Plan	4.89	4.89	0	No	No	Yes	Yes	30	N/A	61	0	0	61	The Century Communities development is currently under construction on this parcel.
317	012805141	N/A	CENTURY COMMUNITIES OF CALIFORNIA LL	Residential	Foothill Boulevard Specific Plan	1.46	1.46	0	No	No	Yes	Yes	13	N/A	18	0	0	18	The Century Communities development is currently under construction on this parcel.
318	012805135	N/A	CENTURY COMMUNITIES OF CALIFORNIA LL	Residential	Foothill Boulevard Specific Plan	2.12	2.12	0	No	No	Yes	Yes	21	N/A	27	0	0	27	The Century Communities development is currently under construction on this parcel.
319	012805137	N/A	CENTURY COMMUNITIES OF CALIFORNIA LL	Residential	Foothill Boulevard Specific Plan	4.66	4.66	0	No	No	Yes	Yes	30	N/A	58	0	0	58	The Century Communities development is currently under construction on this parcel.
435	013209201	N/A	ROOS LAND HOLDINGS RIALTO	General Commercial	R-C	8.63	8.63	0	No	No	Yes	Yes	0	N/A	43	0	0	43	Vacant lot. Adjacent to other vacant property.
436	013225201	N/A	ROOS LAND HOLDINGS RIALTO	Business Park	O-P	9.57	9.57	0	No	No	Yes	Yes	0	N/A	86	0	0	86	Vacant lot. Adjacent to other vacant property.
437	026421108	N/A	LEWIS-HILLWOOD RIALTO COMPANY LLC	Specific Plan Overlay	Renaissance Specific Plan	2.2		0	No	No	Yes				400	0	0	400	400 Homes Entitled for Development.
438	026421109	N/A	LEWIS-HILLWOOD RIALTO COMPANY LLC	Specific Plan Overlay	Renaissance Specific Plan	2.5		0	No	No	Yes								
439	026421206	N/A	LEWIS-HILLWOOD RIALTO COMPANY LLC	Specific Plan Overlay	Renaissance Specific Plan	5.0		0	No	No	Yes								
440	026421207	N/A	LEWIS-HILLWOOD RIALTO COMPANY LLC	Specific Plan Overlay	Renaissance Specific Plan	5.0		0	No	No	Yes								
441	026421208	N/A	LEWIS-HILLWOOD RIALTO COMPANY LLC	Specific Plan Overlay	Renaissance Specific Plan	5.0		0	No	No	Yes								
442	013006127	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-	-	-	-	Entitled Self-Storage Facility

Appendix C

SUMMARY OF COMMUNITY ENGAGEMENT



SUMMARY OF COMMUNITY ENGAGEMENT

Section 65583 of the Government Code states that, "The local government shall make 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." Meaningful community participation is also required in connection with the City's Assessment of Fair Housing (AFH). A discussion of citizen participation is provided below.

As part of the 6th Cycle Housing Element Update process, the City has conducted extensive public outreach activities beginning in Spring 2021. These engagement efforts included virtual community workshops, Planning Commission study sessions, City Council meetings, a community survey, online and social media outreach, tabling at community events, meetings with stakeholders, and digital information through the Housing Element Update webpage.

Outreach for the 6th Cycle Housing Element to the community includes the following actions:

- **Housing Element Update Webpage**: A Housing Element Update webpage was created on the City's website to provide relevant background information and guide the public to outreach events and resources throughout the course of the update process. The website provides information about the update process, key features of the housing element, recorded meetings, a project timeline, surveys and forms, and contact information. A survey is also available on the webpage for persons who wish to become "engagement partners" and offer input and assist in promoting participation throughout the update process. The website is available at the following address: https://www.rialtoca.gov/633/Plan-to-House-Our-Rialto-Housing-Element. **Community Workshop #1**: On May 19, 2021, the City held a virtual community workshop to inform the community of the Housing Element Update process, the RHNA allocation, and upcoming engagement opportunities. The workshop also solicited feedback and input from participants through live surveys and a Q&A session. A breakout room was made available for those who wished to view the presentation and participate solely in Spanish. Recordings of both the English and Spanish workshops were posted to the webpage. Following the virtual workshop, the City organized a self-guided workshop for those who were not able to attend. The self-guided workshop included both in-person and online components. The City tabled at community events and the farmers market and had informational posters available, games for children, and surveys for participants who wished to provide input. The City also provided information on the webpage, posted the May 19th workshop recording, and linked an online survey.
- **Community Survey**: On June 14, 2021, the City released a community survey online to solicit feedback and input on potential locations for housing and on possible housing policies. The survey was made available on the Housing Element Update webpage and in-person at community events and the farmer's market. A total of 119 survey responses were gathered.
- **City Council Meeting**: On July 13, 2021, staff presented to City Council and members of the public during a regular City Council meeting. The presentation provided the Council and community members with information on the update process, current status of the project, engagement

opportunities to-date, and details on the strategies to meet the RHNA allocation. The agenda item was organized to solicit input and recommendations from the City Council.

- **Planning Commission Study Session:** On July 14, 2021, the City held a Study Session with the Planning Commission. The Study Session provided the Commission with information on the update process, current status of the project, engagement opportunities to-date, and details on the strategies to meet the RHNA allocation. The Study Session was organized to solicit input and recommendations from the Planning Commission.
- **Community Workshop #2:** On July 15, 2021, the City held a second virtual community workshop. This workshop provided participants with information on the City's engagement efforts and proposed strategies to meet the RHNA allocation. Participants were given time to pose questions or make comments verbally and through the Zoom chat following the presentation. A separate Zoom meeting was made available for those who wished to view the presentation and participate solely in Spanish. The English and Spanish workshops were recorded and made available for viewing on the Housing Element Update webpage.
- **Interactive Feedback Map:** On July 15, 2021, the City released an interactive GIS map on the Housing Element Update webpage to collect area-specific feedback from the community. The map allows participants to mark and comment on areas that are either good locations for additional housing or locations that are not well suited for additional housing. The map shows the proposed opportunity areas, city-owned sites that have potential for redevelopment, and 5th Cycle sites.
- **Spanish-Speaking Workshop**: On July 17, 2021, the City presented at an in-person workshop for Spanish-speakers hosted by a community organization. This workshop provided participants with information on the City's engagement efforts and proposed strategies to meet the RHNA allocation.
- **Stakeholder Meeting**: On September 15, 2021, the City held a meeting with community stakeholders to present the proposed housing strategy and policy programs, as well as request feedback. Present stakeholders included representatives from Inland Equity Community Land Trust, Legal Aid of San Bernardino, Center for Community Action and Environmental Justice, and California Alliance for Retired Americans.
- **Planning Commission Study Session**: On September 29, 2021, the City held a second Study Session with the Planning Commission. The Study Session provided the Commission with an update on the Document and information on recent community outreach, including correspondence with property owners. The Study Session was organized to solicit further input and recommendations.
- **Special Needs Group Outreach –** The City collaborated with a variety of organizations who work with all segments of the Rialto community. The City outreached to the following groups throughout the Housing Element Update period to notify them of upcoming workshops and meetings, surveys, and draft documents available for review and feedback.
    - A Place Along the Way
    - American Legion
    - Arrowhead Regional Medical Center
    - Bella Park Apartments
    - Bethany Presbyterian Church
    - Big Brothers Big Sisters of Inland Empire

- Bloomington Lane Community Association
- Boys and Girls Club of San Bernardino
- Buen Paster Church Assemblies of God
- CA SBDC Small Business Development Center
- Calvary Chapel
- Care Wagon Medical Transport
- Center for Community Action and Environmental Justice
- Center for Healing Childhood Trauma
- Church of the Nazarene
- City of Rialto Chamber of Commerce
- County of San Bernardino Health Services
- Court Appointed Special Advocates (CASA) of San Bernardino County
- Crosspoint Community Church
- El Sol Neighborhood Educational Center
- Enhancing Forward Action
- First Baptist Church
- Fit 4 Kids
- Foothill Aids Project
- Frazee Community Center
- Gang Reduction Intervention Team (GRIT)
- Grace Lutheran Church
- Grace Vargas Senior Center
- Greater Faith Grace Bible Church
- Iglesia Inland Lighthouse Church Rialto
- Inland County Legal Services, Inc.
- Inland Empire Community Collaborative
- Inland Empire Disabilities Collaborative
- Inland Empire Economic Partnership
- Inland Empire Media Table
- Inland Equity Partnership
- Inland Fair Housing and Mediation Board
- Legal Aid Society of San Bernardino
- National Council of Negro Women/Bethune Center
- Option House
- Rialto Unified School District
- Rialto 7th Day Adventist
- Rialto Adult School
- Rialto Child Assistance
- Rialto Child Development Center
- Rialto Church of Christ
- Rialto Family Health Services
- Rialto First Assembly of God
- Rialto United Methodist Church
- San Bernardino County Department of Public health
- San Bernardino County Homeless Provider Network
- San Bernardino County Housing Authority
- San Bernardino County Library, Rialto Branch
- San Bernardino County Transitional Assistance Department
- San Bernardino County Workforce Investment Board
- SB County Aging and Adult Services
- St. Catherine of Siena Church
- St. John XXIII Catholic Community
- Steelworkers Oldtimers Foundation
- Sunrise Church
- The Israel of God
- The Light Church
- Time for Change Foundation
- TODEC Legal Center
- Valley Fellowship 7th Day Adventist Church
- Veteran Family Support Group
- Volunteers of America

This Appendix contains a summary of all public comments regarding the Housing Element received by the City at scheduled public meetings. As required by Government Code Section 65585(b)(2), all written comments regarding the Housing Element made by the public have previously been provided to each member of the City Council.

Key Findings from Community Engagement Activities

A variety of public comments, suggestions, and recommendations were collected throughout the planning process and provided the proper context to influence and develop the Policy Program contained in **Section 4** of this Housing Element. A summary of community comments and their relationship to the Policy Program is provided below.

Summary of Community Comments	Relationship to Policy Program
There is a need for more affordable housing in the community.	• Program 1A: Acquisition, Rehabilitation, and Resale Program • Program 2D: Accessory Dwelling Unit Construction • Program 2L: Condominium Conversion • Program 2N: Alternative Housing Concepts • Program 2O: Lot Consolidation • Program 2P: Small Lot Consolidation • Program 3B: Preserve and Monitor At-Risk Units
The community needs more affordable housing options for seniors.	• Program 2D: Accessory Dwelling Unit Construction • Housing Program 5A: Affirmatively Furthering Fair Housing • Program 5C: Reasonable Accommodation
Low-income families and households need additional access to opportunities and funding sources.	• Program 1A: Acquisition, Rehabilitation, and Resale Program • Program 1B: Funding for Housing Rehabilitation Programs • Program 1D: Multi-Family Improvement Districts • Program 3A: Down Payment Assistance Program • Program 3D: County Homeownership Program • Program 3F: County Housing Voucher Program • Program 3G: Tenant-Based Rental Assistance
There is a need for assistance in rehabilitating older homes.	• Program 1A: Acquisition, Rehabilitation, and Resale Program • Program 1B: Funding for Housing Rehabilitation Programs • Program 1F: Targeted Neighborhood Approach
Increase the diversity of housing types available at a variety of affordability levels.	• Program 1D: Multi-Family Improvement Districts

Summary of Community Comments	Relationship to Policy Program
	• Program 2D: Accessory Dwelling Unit Construction • Program 2L: Condominium Conversion • Program 2N: Alternative Housing Concepts
Preserve the quality of life of existing neighborhoods.	• Program 1B: Funding for Housing Rehabilitation Programs • Program 1C: Code Enforcement • Program 1F: Targeted Neighborhood Approach • Housing Program 5A: Affirmatively Furthering Fair Housing
Future housing units should be located near public transportation and regional shopping centers.	• Program 2P: Small Lot Consolidation • Program 2B: Rezone to Provide Adequate Sites to Accommodate RHNA

C.1 Community Workshop #1

This section contains all available materials created for the virtual community workshop and following in-person outreach. Public comments for the workshop were received verbally and through the Zoom chat function. The recorded workshop is available for viewing on the Housing Element Update webpage:https://www.rialtoca.gov/633/Plan-to-House-Our-Rialto-Housing-Element.

PLAN TO HOUSE OUR RIALTO

City of Rialto 6th Cycle Housing Element Update

The City is updating the Housing Element for the years 2021-2029.

Let's work together to make the plan ours!

The Housing Element is the City's Plan to accommodate housing needs for current and future residents of all income levels in Rialto. Planning to House Our Rialto means:

- Embarking on a series of engagement opportunities to hear from you,
- Reviewing the City's current housing policies and programs,
- Analyzing existing housing conditions and land which can accommodate new housing, and
- Updating the City's housing plan to reflect Rialto's needs and create opportunities for private residential development.

What's the Schedule for participation? See the timeline below:

April-May	Community Workshop #1 - May 19 - June 6
May-July	Interactive Mapping and Online Survey - June 14-27
July-August	Community Workshop #2 - July 15 - 30
August-October	Public Review of Document for Comment - Sept. 2021

For more information and to sign up for email updates,
Scan the QR code or visit the City's website:
www.yourrialto.com/HouseOurRialto

The City needs your ideas and input!

PLAN DE VIVIENDAS EN NUESTRO RIALTO

6º Ciclo de la Actualización del Elemento de Vivienda de la Ciudad de Rialto

La ciudad está actualizando el Elemento de Vivienda para los años 2021-2029.

¡Trabajemos juntos para hacerlo Nuestro Plan!

El Elemento de Vivienda es el plan de la ciudad para adaptarse a las necesidades de vivienda de los residentes actuales y futuros de todos los niveles de ingreso en Rialto.

- Embarcarse en una serie de oportunidades de participación para escuchar su opinión,
- Revisar las normas y programas de vivienda actuales de la ciudad
- Analizar las condiciones de vivienda existentes y terrenos que se puedan adaptar para nuevas viviendas, y
- Actualizar el plan de vivienda de la ciudad para reflejar las necesidades de Rialto y crear oportunidades para el desarrollo residencial privado

¿Cuáles son las fechas para participar? Vea los horarios a continuación:

abril-mayo	Taller Comunitario #1 - mayo 19 - junio 6
mayo-julio	Mapa interactivo y encuesta en línea - junio 14-27
julio-agosto	Taller Comunitario #2 - julio 15 - 30
agosto-octubre	Revisión Pública del Documento para Comentarios - sep. 2021

Para obtener más información y registrarse para recibir mensajes por correo electrónico, visite el sitio web de la ciudad: www.yourrialto.com/HouseOurRialto

¡La ciudad necesita sus ideas y aportes!

PLAN TO HOUSE OUR RIALTO

PLAN DE VIVIENDAS EN NUESTRO RIALTO

Like the State of California, the Inland Empire faces housing challenges. Homeowners and renters spend much of their income on housing, some have difficulty finding housing, and population increase has outpaced construction. In this context, the City of Rialto is preparing the "Plan to House Our Rialto: 2021-2029 Housing Element Update" that will establish policies to address existing and future housing needs while preserving community character and creating opportunities for developers to construct new housing.

The City invites you to help plan for the wide-ranging needs of our diverse community.

Al igual que el estado de California, Inland Empire enfrenta desafíos de vivienda. Los propietarios e inquilinos gastan gran parte de sus ingresos en la vivienda, algunos tienen dificultades para encontrar una vivienda y el aumento de la población ha superado la construcción. En este contexto, la Ciudad de Rialto está preparando el "Plan de Viviendas en Nuestro Rialto: Actualización del Elemento de Vivienda 2021-2029" que establecerá normas para abordar las necesidades de vivienda existentes y futuras al mismo tiempo que se preserva el carácter de la comunidad y se crean oportunidades para que los desarrolladores construyan nuevas viviendas.

La ciudad lo invita a ayudar a planificar las necesidades de nuestra diversa comunidad.

FOR MORE INFORMATION
PARA MÁS INFORMACIÓN

- Contact Siri Champion, Project Planner: 909-820-8072 or schampion@rialtoca.gov
- Visit www.yourrialto.com/HouseOurRialto
- Comuníquese con Siri Champion, Planificador del Proyecto: al 909-421-8072 o en schampion@ rialtoca.gov
- Visite www.yourrialto.com/HouseOurRialto

Flip to get involved
Dé Vuelta a la hoja para participar

Project Schedule and Opportunities to Engage

Let's "Plan to House Our Rialto" together. We invite you help create a plan that reflects the diverse needs and ideas of our community. Below you'll find several ways to engage. In addition, you may attend Planning Commission and City Council meetings. All dates are subject to change. Stay up to date at http://www.yourrialto.com/HouseOurRialto.

Phase 1: Issues & Opportunities

Virtual Workshop: May 19, 2021 at 6:30 p.m.
Alternative Opportunities: May 20-June 6

- Self-Guided Online Workshop
- Self-Guided In-Person Activity at the Community Center, Senior Center, and Fitness Center

Phase 2: Sites, Densities & Policy

Online or In Person Survey: June 14-27

Phase 3: Draft Plan Review

Virtual Workshop: July 15, 2021 at 6:30 p.m.
Alternative Opportunities: July 16-30

- Self-Guided Online Workshop
- Self-Guided In-Person Activity

Phase 4: Final Review/ Adoption

Final public review: September 2021
Planning Commission: September 15, 2021
City Council: September 28, 2021

Calendario del Proyecto y Oportunidades para Participar

Vamos a "Plan de Viviendas en Nuestro Rialto" juntos. Lo invitamos a que participe en la creación de un plan que refleje las necesidades e ideas diversas de nuestra comunidad. Abajo encontrará varias formas en que puede participar. Además, puede asistir a las juntas de la Comisión de Planificación y Concejo de la Ciudad. Todas las fechas están sujetas a cambios. Mántengase actualizado en: http://www.yourrialto.com/HouseOurRialto.

Fase 1: Comentarios & Oportunidades

Taller Virtual: mayo 19 del 2021 - 6:30 p.m.
Oportunidades Alternativas: mayo 20-junio 6

- Taller Autoguiado en Línea
- Actividad Autoguiada en Persona en el Centro Comunitario, en el Centro para Persons Mayores y en el Gimnasio

Fase 2: Sitios, Densidad & Políticas

Encuesta en Línea o en Persona : junio 14-27

Fase 3: Revisión del Borrador del Plan

Taller Virtual: julio 15 del 2021 - 6:30 p.m.
Oportunidades Alternativas: julio 16-30

- Taller Autoguiado en Línea
- Actividad Autoguiada en Persona

Fase 4: Revisión Final/ Adopción

Revisión pública final: sept. del 2021
Comisión de Planificación: sept. 15 del 2021
Concejo de la Ciudad: sept 28 del 2021

Let's Plan Together! ¡Vamos a Planificar Juntos!

www.yourrialto.com/HouseOurRialto

Sign Up for Virtual Meeting Links and Project Updates | Anótese para recibir los enlaces para las Reuniones Virtuales y Actualización del Proyecto

Sign up for project updates...

& WIN A LEGO® KIT!

Inscríbase para recibir información actualizada...

! Y GANAR UN JUEGO DE LEGO® !

Sign up for project updates...

& WIN A BIRDHOUSE

Inscríbase para recibir información actualizada...

Y GANAR UN PAJARO

PLAN TO HOUSE OUR RIALTO

City of Rialto 6th Cycle Housing Element Update

Welcome

Welcome to the City of Rialto's virtual self-guided Phase 1 Community Workshop! Please review the information about the Housing Element and fill out the Survey form provided. Thank you!

Background

In March 2021, the City of Rialto initiated the process to update its Housing Element titled the "Plan to House Our Rialto: 2021-2029 Housing Element Update". The Plan will serve as the City's vision for and approach to meeting existing and future housing needs. The Plan identifies opportunities for new residential development. The City does not build housing but instead provides policies and programs to facilitate development as planned.

Who considers Rialto Home?

The goal of the "Plan to House Our Rialto" is to adopt a Housing Plan responsive to the needs and visions of residents and stakeholders. Housing needs and choices vary depending on age, ability, household characteristics, and more. So who considers Rialto home? The figures to the right provide information on who considers Rialto home.

Housing Market

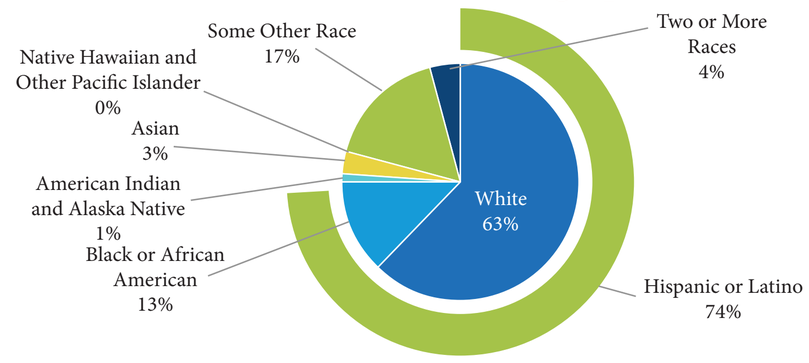
The availability and affordability of housing units are a function of supply (housing units) and demand (population). In the chart to the right we see that housing construction is down. Since 1989 each decade has produced fewer housing units as a percentage of the total housing stock. However, Rialto's population continues to grow. Since 2010 the population has grown by about 4,800 people. Regional growth forecasts show that Rialto is anticipated to gain about 7,900 more people in the next 20 years.

Types of Housing

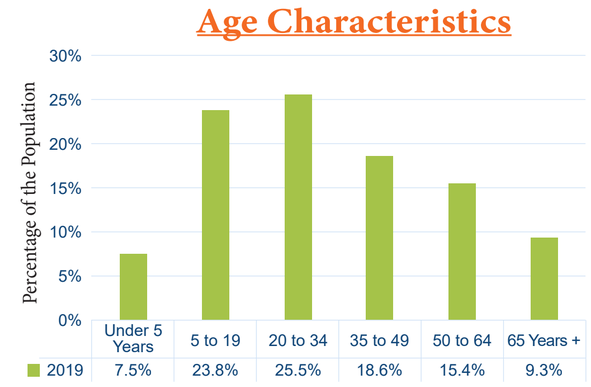
We need to have enough units in total and the right types of units. Families, individuals, lower income households, seniors, and others tend to have different housing needs. As the figure below shows, single-family homes make up nearly three-quarters of the total supply.

Through the Housing Element Update process we will examine the need for more specific types of homes such as senior apartments, homes for large families, and multi-family apartments affordable to various income groups.

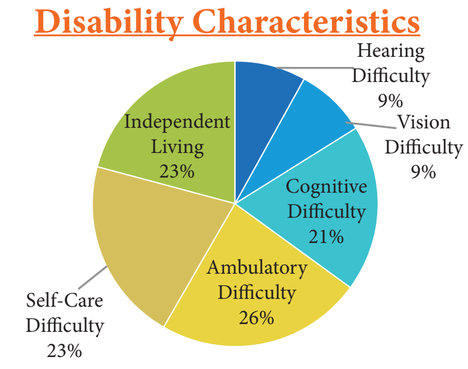
Racial and Ethnic Demographics



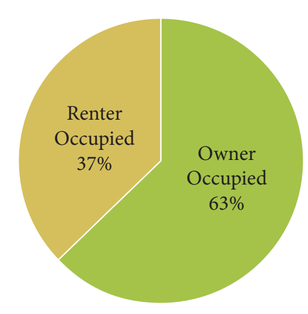
Age Characteristics



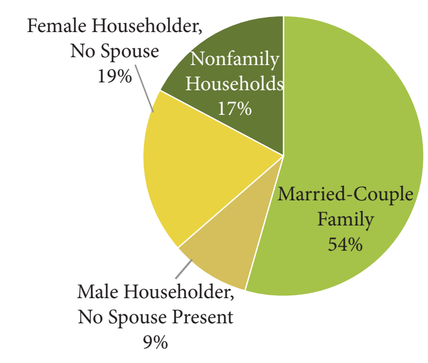
Disability Characteristics



Housing Tenure (Renter vs. Owner)

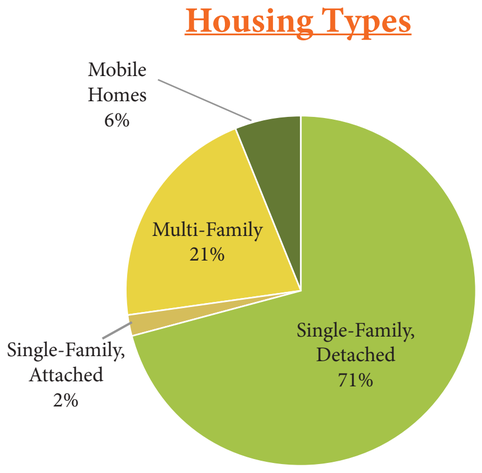


Household Types

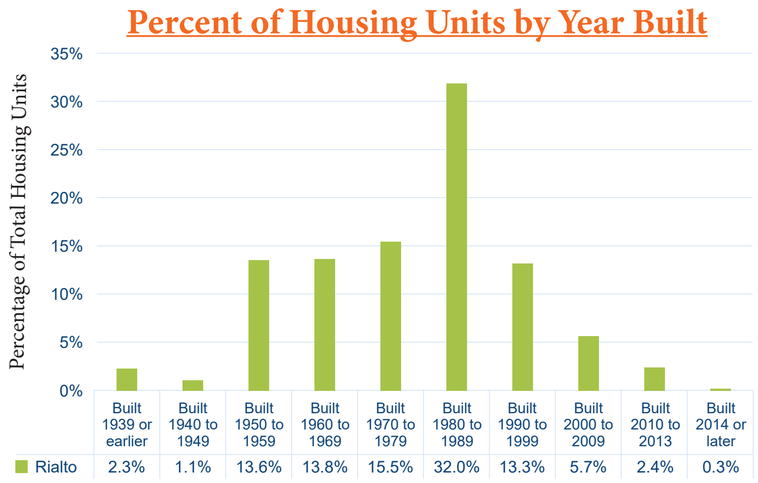


Data Source: American Community Survey, 5-Year Estimates, 2019.

Housing Types



Percent of Housing Units by Year Built



RHNA Determination Process

Department of Housing and Community Development

HCD determines and distributes the State's housing need to all the regional councils of government

→

Southern California Association of Governments

SCAG develops methodology to determined "fair share" distribution of the region's housing need to local jurisdictions

→

City of Rialto RHNA Allocation, 2021-2029

8,272 units

2021 - 2029 City of Rialto RHNA Housing Needs Allocation

Income Category	% of Area Median Income (AMI)	Income Range*		RHNA Allocation (Housing Units)
		Min.	Max.	
Very Low Income	0 - 50%	--	$38,750	2,218 units
Low Income	51 - 80%	$38,751	$62,000	1,206 units
Moderate Income	81 - 120%	$62,001	$93,000	1,371 units
Above Moderate Income	> 120%	$93,001	--	3,477 units
			Total	8,272 units

*Based on the 2021 HUD Area Median Income (AMI) for San Bernardino County of $77,500 for a family of four.

Housing Needs Assessment

We need to understand the current and potential future housing needs for the Plan to be successful. The Regional Housing Needs Assessment (RHNA) allocation is the number of housing units each city or county must plan to accommodate through the Housing Element. RHNA is based on forecasts for population, employment, and households. The RHNA determination process is illustrated on the left. Rialto's RHNA Allocation of 8,272 dwelling units is further broken down by income category in the table to the left.

What's in a Housing Element?

The Housing Element is a plan to meet future housing needs including the RHNA. It is made up of several components including:

- a population and housing profile,
- analysis of housing constraints and resources,
- an evaluation of current adopted programs and policies,
- an analysis of potential sites to accommodate anticipated growth, and
- policies, programs, and objectives to support identified housing goals for Rialto.

Key Issues

Through the planning process, the City seeks to engage residents and stakeholders on key issues. Those include:

Where do we increase density to accommodate more housing? And how do we knit "adequate sites" into our City's fabric?

The City does not currently have sufficient land zoned to accommodate our RHNA allocation. We must plan "adequate sites" to meet our RHNA allocation of 3,424 dwelling units affordable to very-low and low-income households. The State requires these "adequate sites" to be zoned for at least 30 units per acre to qualify. The City will engage with residents and stakeholders to identify where we can increase density and allow for additional units.

What types of special housing needs does the community have? How do we meet those needs?

The Housing Plan also addresses special needs groups such as those with disabilities, seniors, large family households, female-headed households, and those who are experiencing homelessness.

Visit www.yourrialto.com/HouseOurRialto or send comments or questions to Siri Champion, Project Planner, at (909) 820-8072 or schampion@rialtoca.gov.

PLAN DE VIVIENDAS EN NUESTRO RIALTO

6º Ciclo de la Actualización del Elemento de Vivienda de la Ciudad de Rialto

Bienvenidos

¡Bienvenidos al Taller Virtual Comunitario autoguiado de la Fase 1 de la ciudad de Rialto! Por favor revise la información acerca del Elemento de Vivienda y complete el formulario de la Encusta provisto. ¡Gracias!

Antecedentes

En marzo de 2021, la ciudad de Rialto inició el proceso para actualizar su Elemento de Vivienda titulado: "Planeemos las Viviendas en Nuestro Rialto de la Actualización del Elemento de Vivienda 2021-2029". El Plan identifica oportunidades para nuevos desarrollos residenciales. La ciudad no contruye las viviendas, sino que proporciona las normas y programas para facilitar el desarrollo según lo planeado.

¿Quién Considera a Rialto como su Hogar?

El objetivo del proceso "Planeemos las Viviendas en Nuestro Rialto" es adoptar un Plan de Viviendas que responda a las necesidades y visiones de los residentes y las partes interesadas. Las necesidades y opciones de vivienda varían según la edad, la capacidad, las características de los hogares y otros aspectos.

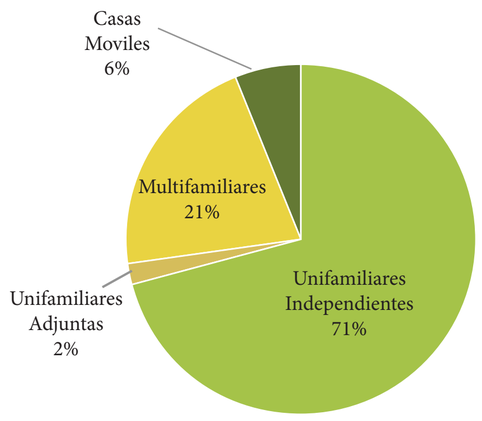
Mercado Inmobiliario

La disponibilidad y asequibilidad de las unidades de vivienda son una función de la oferta (unidades de vivienda) y la demanda (población). En el gráfico de la derecha vemos que la construcción de viviendas ha bajado. Desde 1989, cada década ha producido menos unidades de vivienda como porcentaje del inventario total de viviendas. Sin embargo, la población de Rialto sigue creciendo.

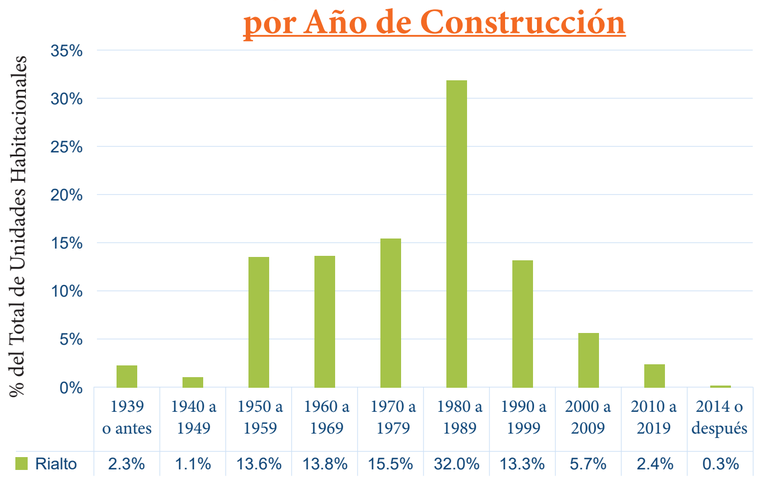
Tipos de Vivienda

Necesitamos tener suficientes unidades en total y los tipos correctos de unidades. Las familias, los individuos, los hogares de bajos ingresos, las personas mayores y otros tienden a tener diferentes necesidades de vivienda. Como muestra la figura siguiente, las viviendas unifamiliares representan casi las tres cuartas partes del inventario total. A través del proceso de Actualización del Elemento de Vivienda, examinaremos la necesidad de tipos más específicos de viviendas tales como apartamentos para personas mayores, hogares para familias numerosas, y apartamentos multifamiliares asequibles para todos los diferentes grupos de ingreso. A través del proceso de Actualización del Elemento de Vivienda, examinaremos la necesidad de tipos de vivienda más específicos, tales como apartamentos para personas mayores, hogares para familias numerosas, y apartamentos multifamiliares asequibles para varios grupos de ingreso.

Tipos de Vivienda



Porcentaje de Unidades Habitacionales por Año de Construcción



Proceso de Determinación del RHNA

Departamento de Vivienda y Desarrollo Comunitario

El HCD determina y distribuye la necesidad de vivienda del estado a todos los concejos regionales del gobierno

→

Asociación de Gobiernos del Sur de California

SCAG desarrolla una metodología para determinar la distribución "justa" de la necesidad de vivienda de la región en las jurisdicciones locales

→

Distribución del RHNA de la ciudad de Rialto, 2021-2029

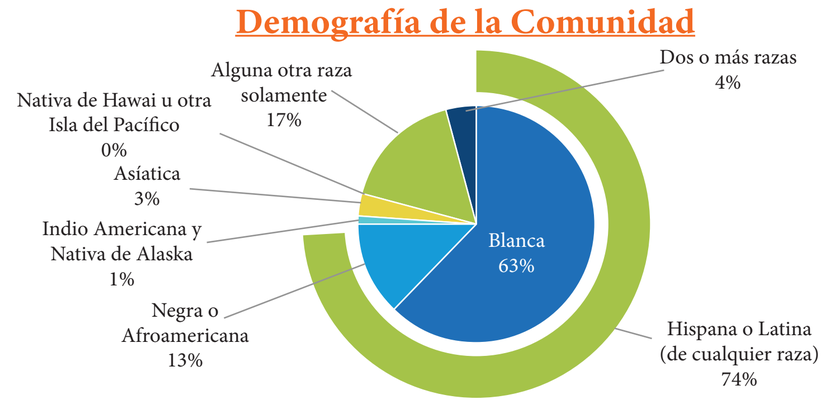
8,272 unidades

Distribución de las Necesidades de Vivienda RHNA de la Ciudad de Rialto 2021-2029

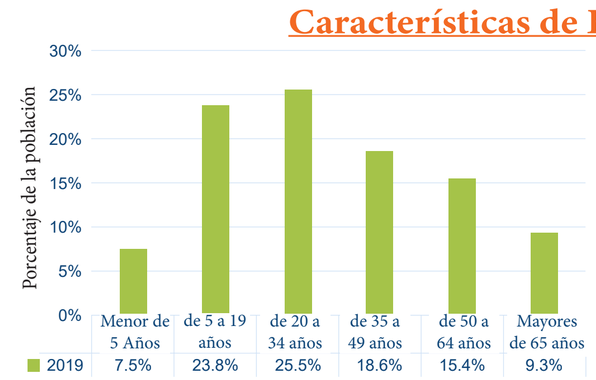
Categoría de Ingresos	% de Ingreso Medio del Área (AMI)	Escala de Ingresos*		Distribución del RHNA (Unidades Habitacionales)
		Mínimo	Máximo	
Ingresos Muy Bajos	0 - 50%	--	$38,750	2,218 unidades
Ingresos Bajos	51 - 80%	$38,751	$62,000	1,206 unidades
Ingresos Moderados	81 - 120%	$62,001	$93,000	1,371 unidades
Superior al Ingreso Moderado	> 120%	$93,001	--	3,477 unidades
			Total	8,272 unidades

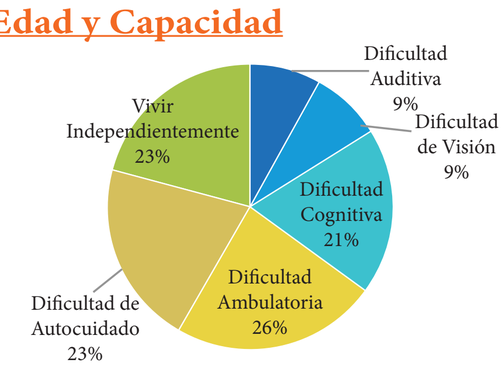
*La escala de ingresos está basada en el Ingreso Medio del Área (siglas en inglés: AMI) del Departamento de Desarrollo Habitacional y Urbano (siglas en inglés: HUD) de 2021 para el condado de San Bernardino de $77,500 para una familia de 4.

Demografía de la Comunidad



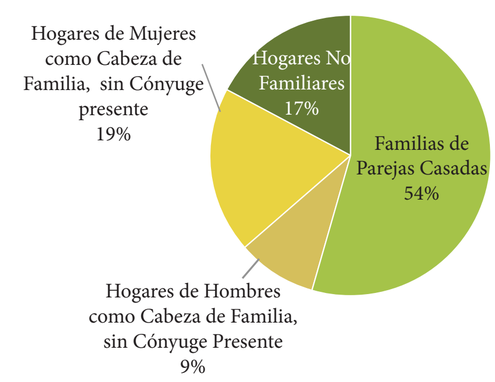
Características de Edad y Capacidad





Tenecia de la Vivienda

Características de la Vivienda



Data Source: American Community Survey, 5-Year Estimates, 2019.

Evaluación de las Necesidades de Vivienda

Necesitamos entender las necesidades de vivienda actuales y futuras para que el Plan tenga éxito. La distribución de la Evaluación de Necesidades de Vivienda Regional (RHNA) es la cantidad de unidades de vivienda que cada ciudad o condado debe planificar para acomodar a través del Elemento de Vivienda. El RHNA se basa en pronósticos de población, empleo y hogares. El proceso de determinación de RHNA se ilustra a la izquierda. La Distribución de RHNA de Rialto de 8,272 unidades de vivienda se desglosa por categoría de ingresos en la tabla de la izquierda.

¿Qué Contiene un Elemento de Vivienda?

El Elemento de Vivienda es un plan para satisfacer las necesidades futuras de vivienda, incluido el RHNA:

- un perfil de población y vivienda,
- un análisis de las limitaciones y los recursos de la vivienda,
- una evaluación de los programas y políticas adoptados actualmente,
- un análisis de sitios potenciales para adaptarse al crecimiento anticipado, y
- políticas, programas y objetivos para apoyar las metas de vivienda identificadas para Rialto.

Puntos Clave

A través del proceso de planificación, la ciudad busca involucrar a los residentes y partes interesadas en los puntos clave. Estos incluyen:

¿En dónde aumentamos la densidad para acomodar más viviendas? Y, ¿Cómo entrelazamos "sitios adecuados" en el telar de la ciudad?

La ciudad no cuenta actualmente con suficientes terrenos zonificados para acomodar nuestra distribución de RHNA. Debemos planificar "sitios adecuados" para cumplir con nuestra distribución de RHNA de 3,424 unidades habitacionales asequibles para viviendas de ingresos bajos e ingresos muy bajos. El estado requiere que estos "sitios adecuados" estén zonificados para por lo menos 30 unidades por acre para poder calificar. La ciudad se comprometerá con los residentes y las partes interesadas para identificar en dónde se puede aumentar la densidad y permitir unidades adicionales.

¿Qué tipo de necesidades especiales de vivienda tiene la comunidad? ¿Cómo podemos satisfacer esas necesidades?

El Plan de Vivienda también aborda los grupos con necesidades especiales tales como grupos con discapacidades, personas mayores, hogares de familias numerosas, hogares encabezados por mujeres y aquellos que están experimentando la falta de vivienda.

Visite www.yourrialto.com/HouseOurRialto o envíe sus comentarios o preguntas a Siri Champion, Planificadora del Proyecto, al (909) 820-8072 o schampion@rialtoca.

Plan to House Our Rialto: 2021-2029 Housing Element Update

Phase 1: Virtual Workshop and Self-Guided Workshop

On May 19th, the City held a virtual community workshop to inform the community of the Housing Element Update process and upcoming engagement opportunities. A self-guided workshop was made available online and in-person at multiple locations for those who were unable to attend the virtual workshop. The following provides the feedback received from the public during this phase one of outreach.

1.What has your experience been with housing in Rialto?

A lot of difficulty	Lack of new homes for very Income and above middle-income homes. New construction.	My experience has not been good. We are very late in the game and many questions were asked in 2019 to address our issues, and community was ignored. I am however glad that the city is being proactive to address the issue.
We own our home	Programs for improvement and rehabilitation of older and historic homes	We need affordable housing for all
It's very expensive right now. Cash offers only for older housing.	Programs for assistance for very low-income resident new home	Need more senior housing for the disabled
I have struggled and now live on the streets	Not enough low income purchasing of homes just rental options	Need more affordable housing
New to the City staff, but happy to be here with you all now.	We need more apartments. Single family homes are not affordable	Incentives of larger homes for higher income earning families
Need more mixed income integration of housing and not concentrations of poverty in the city	RHNA shows need highest in very low-income homes and above moderate-income homes	Rent control

Rezoning from housing to industrial has put the housing development at a disadvantage. Warehouses are considered instead of housing our communities.	Difficulty in finding available apartments. Houses are limited due to sales not occurring as frequent.	More development needed with affordable housing for residents. Home prices do not reflect living wages in this area.
Good; very friendly	Thriving downtown	Diversity
Excellent!	Hard to purchase a home. Covid 19 has further the marginalization for BIPIOC and POC to home ownership.	My family has lived in Rialto for over 50 years. We have lived in 2 homes. 1st, we moved to a new development near Meyers school. Then, near Frisbie.

2.In a couple words, what do you value about Rialto's existing neighborhoods?

Additional Comments Received In-Person or On-Line

- It's not LA. Low crime rate, eve pace traffic and a strong sense of community and pride.
- Where I live, I appreciate the diversity and the quality of homes in my neighborhood.
- Calm; friendly; respected
- I value the schools and new marketplaces that have recently been developed
- The respect of having long time homeowners nearby feels comfortable.

3.What are some housing challenges or needs in Rialto?

Rehabilitation of holder homes	More affordable housing	We need affordable housing for all
Environmentally friendly housing	Multigeneration housing is needed	Larger homes with larger backyards
Larger homes to attract higher incomes	Low income housing for the very low income	Programs for single parents to be able to afford a home or rent
Rezoning of designated housing land	Need more permanent affordable housing not just rentals	Not enough mix use housing with commercial for younger residents

Safety and air quality impacting people's health therefore pushing people out	Affordable rents, gentrification due to rising property values, lack of access to affordable homes.	Rent is expensive; housing is expensive, too many apartment homes not enough for homeless shelters
The lack of apartments available to those who cannot buy or do not want to buy houses. Creating apartments with space in between is an issue. As apartments are always built side by side.	Not all sites/units available for affordable housing have been specific with APN numbers in the housing element for development opportunities	I think the most challenging thing is keeping-up the property values. To understand the value of property and how to keep it up. I think also to have pride in a person's property. That is important!! To know and understand the city's expectations of homeowners. To have pride in the city. When I am saying this, I am thinking primarily of the older neighborhoods.
More space/privacy	Overcrowding	Rent control

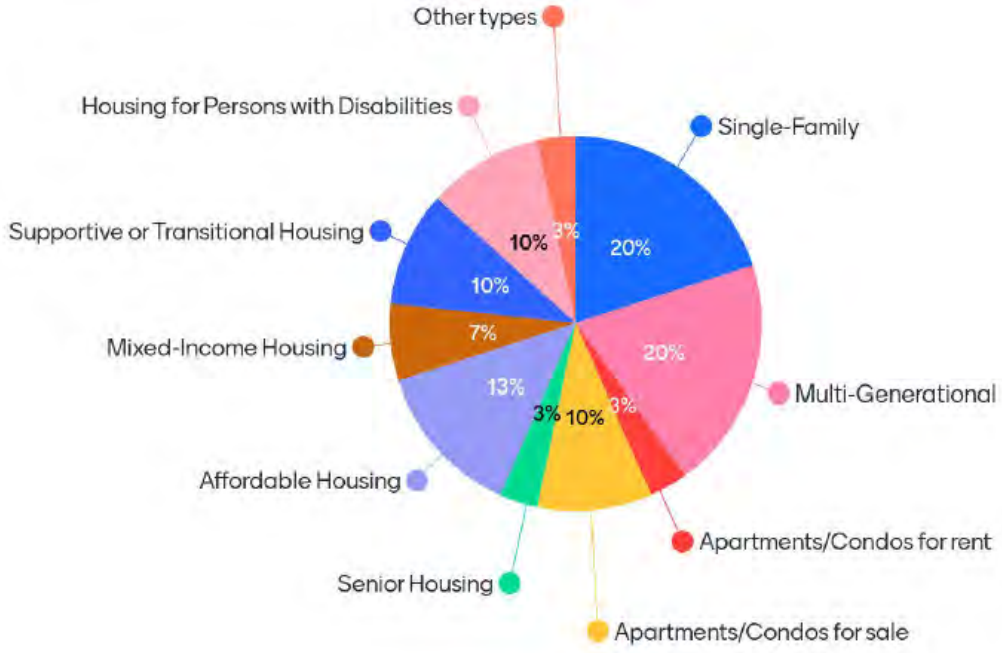
4.What is your vision for the future of housing in Rialto? Consider your past responses and needs of future generations.

<u>Additional Comments Received In-Person or On-Line</u>

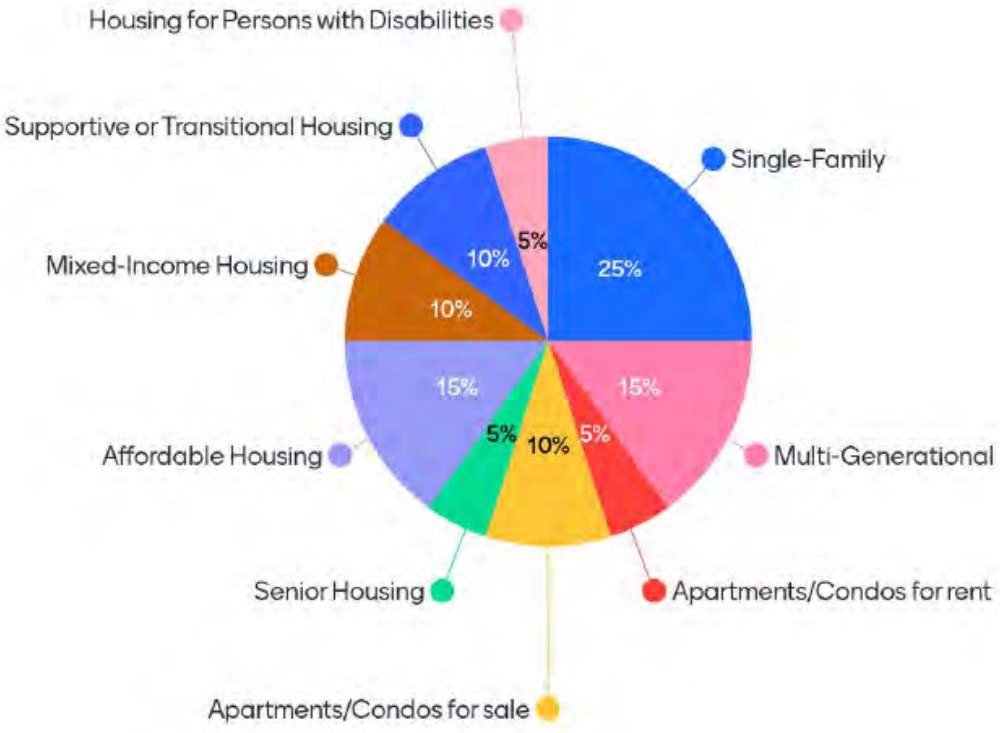
- More houses that help out the community like housing for homeless people and family living. Also, not expensive enough where you have to rent to 5 or more people.
- Apartments built in various areas to provide adequate housing. In different areas to provide apartments with space. Also to reduce traffic by not building apartments side by side. A constant issue in major cities is lack of parking due to side by side buildings.

Plan to House Our Rialto:
2021-2029 Housing Element Update

5.What types of new housing should be built in Rialto? Choose all that apply.



6.Of the previous housing types, which 3 would you like the City to prioritize?



Plan to House Our Rialto:
2021-2029 Housing Element Update

7.What kind of features or characteristics would you like to see in future Rialto neighborhoods?

Rehab of older homes in Historic district	Larger homes	Civic Community Centers	Access to public transportation	Mixed- zoning housing/ workplace
Expansion of newer Renaissance Area	Dog parks	Connectivity- -walking trails -bike lanes	More public transit accessibility	Better lighting on streets
	Safe crossing locations in older streets (Lilac Ave)	Green energy powered communitites	Recycling services	Rehabilitated and revitalized old down town (historic district)

8.The City of Rialto 2014-2021 Housing Element Mid-Cycle Update established the following goals:

- ***Maintain and improve the quality of existing housing and neighborhoods in Rialto.***
- ***Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.***
- ***Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.***
- ***Alleviate any potential government constraints to housing production and affordability.***
- ***Promote equal opportunity for all residents to reside in the housing of their choice.***

What additions or comments do you have on these goals?

Intentional zoning	Community gardening	New all-inclusive City Hall	Community wealth
To preserve he quality of life for the residents; no more warehouses	Missing civic area and buildings – community building areas/ services/ recreation – park with pool	Public transportation throughout City and near housing – more bus services throughout City and suburb area	More investments from City and County in transportation corridors
No pockets of poverty – integration of incomes – inclusive	Energy efficient trolley collecting Historic Area with new development	Support when speaking on improving the quality of housing	Permanent affordable housing
Clean energy solutions			

Plan to House Our Rialto:
2021-2029 Housing Element Update

Workshop #1 Questionnaire

1: Name: [redacted]

2. Email: [redacted]

3. What has your experience been with housing in Rialto?

Good; very friendly

4. In a couple of words, what do you value about Rialto's existing neighborhoods?

Calm; friendly; respected

Plan to House Our Rialto:
2021-2029 Housing Element Update

5. What housing challenges or needs exist in Rialto?

Rent is expensive; housing is expensive, too many apartment homes not enough for homeless shelters.

6. What is your vision for the future of housing in Rialto. Consider your past responses and the needs of future generations.

More houses that help out the community like housing for homeless people and family living. Also, not expensive enough where you have to rent to 5 or more people.

7. What types of new housing should be built in Rialto?

- [x] Single-Family
- [ ] Multi-Generational
- [ ] Apartments/Condos for Rent
- [ ] Apartments/Condos for Sale
- [ ] Senior Housing
- [ ] Affordable Housing
- [x] Mixed-Income Housing
- [ ] Supportive or Transitional housing
- [x] Housing for Persons with Disabilities
- [ ] Other: _____

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8. Of those previous housing types, which three (3) would you like the City to prioritize? (Choose up to 3 choices)

- [x] Single-Family
- [ ] Multi-Generational
- [ ] Apartments/Condos for Rent
- [ ] Apartments/Condos for Sale
- [ ] Senior Housing
- [x] Affordable Housing
- [ ] Mixed-Income Housing
- [ ] Supportive or Transitional housing
- [x] Housing for Persons with Disabilities
- [ ] Other: _____

_____

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9. What kinds of features or characteristics would you like to see in future Rialto neighborhoods?

Affordable housing for everyone in the community.

10. Access to public transportation is important for residential development in the region. What do you think about new multi-story housing, mixed with other uses, on Foothill Boulevard and Riverside Avenue? Where else should this type of housing be located?

I believe that would be greeat for people who need transportation. There should be housing on Riverside Ave. & San Bernardino way.

11. The City of Rialto 2014-2021 Housing Element Mid-Cycle Update established the following goals. What additions or comments do you have on these goals?

- Maintain and improve the quality of existing housing and neighborhoods in Rialto.
- Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.
- Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.
- Alleviate any potential governmental constraints to housing production and affordability.
- Promote equal opportunity for all residents to reside in the housing of their choice.

Think people need to know more about the socioeconomic segments of the community & region. People know so little about it.

12. If you have additional comments or questions, please share here.

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Thank you for taking our survey, please return this to staff to record your responses. Stay tuned for more information about the Plan to House our Rialto and visit www.yourrialto.com/HouseOurRialto!

Plan to House Our Rialto:
2021-2029 Housing Element Update

Workshop #1 Questionnaire

1: Name: [redacted]

2. Email: [redacted]

3. What has your experience been with housing in Rialto?

Difficulty in finding available apartments. Houses are limited due to sales not occurring as frequent.

4. In a couple of words, what do you value about Rialto's existing neighborhoods?

The residential areas feel traditional and close to each neighbor creating a home with feelings of safety and close bonds.

5. What housing challenges or needs exist in Rialto?

The lack of apartments available to those who cannot buy or do not want to buy houses. Creating apartments with space in between is an issue. As apartments are always built side by side.

6. What is your vision for the future of housing in Rialto. Consider your past responses and the needs of future generations.

Apartments built in various areas to provide adequate housing. In different areas to provide apartments with space. Also to reduce traffic by not building apartments side by side. A constant issue in major cities is lack of parking due to side by side buildings.

7. What types of new housing should be built in Rialto?

- [x] Single-Family
- [ ] Multi-Generational
- [x] Apartments/Condos for Rent
- [x] Apartments/Condos for Sale
- [x] Senior Housing
- [x] Affordable Housing
- [x] Mixed-Income Housing
- [ ] Supportive or Transitional housing
- [x] Housing for Persons with Disabilities
- [ ] Other: _____

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8. Of those previous housing types, which three (3) would you like the City to prioritize? (Choose up to 3 choices)

- [x] Single-Family
- [ ] Multi-Generational
- [x] Apartments/Condos for Rent
- [ ] Apartments/Condos for Sale
- [ ] Senior Housing
- [x] Affordable Housing
- [ ] Mixed-Income Housing
- [ ] Supportive or Transitional housing
- [ ] Housing for Persons with Disabilities
- [ ] Other: _____

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9. What kinds of features or characteristics would you like to see in future Rialto neighborhoods?

Major street repairs for all the pot holes. Street lightings added in area not well lit.

10. Access to public transportation is important for residential development in the region. What do you think about new multi-story housing, mixed with other uses, on Foothill Boulevard and Riverside Avenue? Where else should this type of housing be located?

I'm unsure of the new multi-story housing depending on the space included. The safety or security of the area. What enhancements would be done to secure that.

11. The City of Rialto 2014-2021 Housing Element Mid-Cycle Update established the following goals. What additions or comments do you have on these goals?

- Maintain and improve the quality of existing housing and neighborhoods in Rialto.
- Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.
- Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.
- Alleviate any potential governmental constraints to housing production and affordability.
- Promote equal opportunity for all residents to reside in the housing of their choice.

Increase housing with observation of traffic reduction or safety increasement.

12. If you have additional comments or questions, please share here.

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Thank you for taking our survey, please return this to staff to record your responses. Stay tuned for more information about the Plan to House our Rialto and visit www.yourrialto.com/HouseOurRialto!

Plan to House Our Rialto:
2021-2029 Housing Element Update

Workshop #1 Questionnaire

1: Name [redacted]

2. Email: [redacted]

3. What has your experience been with housing in Rialto?

More development needed with affordable housing for residents.
Home prices do not Reflect living wages in this area.

4. In a couple of words, what do you value about Rialto's existing neighborhoods?

i value the schools and new market places that have
recently been developed

5. What housing challenges or needs exist in Rialto?

6. What is your vision for the future of housing in Rialto. Consider your past responses and the needs of future generations.

7. What types of new housing should be built in Rialto?

- ☐ Single-Family
- ☐ Multi-Generational
- ☐ Apartments/Condos for Rent
- ☐ Apartments/Condos for Sale
- ☐ Senior Housing
- ☐ Affordable Housing
- ☐ Mixed-Income Housing
- ☐ Supportive or Transitional housing
- ☐ Housing for Persons with Disabilities
- ☐ Other: _____

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8. Of those previous housing types, which three (3) would you like the City to prioritize? (Choose up to 3 choices)

- ☐ Single-Family
- ☐ Multi-Generational
- ☐ Apartments/Condos for Rent
- ☐ Apartments/Condos for Sale
- ☐ Senior Housing
- ☐ Affordable Housing
- ☐ Mixed-Income Housing
- ☐ Supportive or Transitional housing
- ☐ Housing for Persons with Disabilities
- ☐ Other: _____

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9. What kinds of features or characteristics would you like to see in future Rialto neighborhoods?

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10. Access to public transportation is important for residential development in the region. What do you think about new multi-story housing, mixed with other uses, on Foothill Boulevard and Riverside Avenue? Where else should this type of housing be located?

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11. The City of Rialto 2014-2021 Housing Element Mid-Cycle Update established the following goals. What additions or comments do you have on these goals?

- Maintain and improve the quality of existing housing and neighborhoods in Rialto.
- Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.
- Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.
- Alleviate any potential governmental constraints to housing production and affordability.
- Promote equal opportunity for all residents to reside in the housing of their choice.

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12. If you have additional comments or questions, please share here.

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Thank you for taking our survey, please return this to staff to record your responses. Stay tuned for more information about the Plan to House our Rialto and visit www.yourrialto.com/HouseOurRialto!

Plan to House Our Rialto:
2021-2029 Housing Element Update

Workshop #1 Questionnaire

1: Name: [redacted]

2. Email: [redacted]

3. What has your experience been with housing in Rialto?

Excellent!!

4. In a couple of words, what do you value about Rialto's existing neighborhoods?

The Respect of having Long time home owners near by feels comfterable

Plan to House Our Rialto:
2021-2029 Housing Element Update

5. What housing challenges or needs exist in Rialto?

More Space / privacy

6. What is your vision for the future of housing in Rialto. Consider your past responses and the needs of future generations.

Mordernly Upgraded for a More Comfterable living

7. What types of new housing should be built in Rialto?

- [x] Single-Family
- [x] Multi-Generational
- [x] Apartments/Condos for Rent
- [x] Apartments/Condos for Sale
- [x] Senior Housing
- [x] Affordable Housing
- [x] Mixed-Income Housing
- [x] Supportive or Transitional housing
- [x] Housing for Persons with Disabilities
- [ ] Other: _____

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8. Of those previous housing types, which three (3) would you like the City to prioritize? (Choose up to 3 choices)

- ☐ Single-Family
- ☑ Multi-Generational
- ☐ Apartments/Condos for Rent
- ☐ Apartments/Condos for Sale
- ☑ Senior Housing
- ☐ Affordable Housing
- ☐ Mixed-Income Housing
- ☐ Supportive or Transitional housing
- ☑ Housing for Persons with Disabilities
- ☐ Other: _____

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9. What kinds of features or characteristics would you like to see in future Rialto neighborhoods?

Fencing and walls

10. Access to public transportation is important for residential development in the region. What do you think about new multi-story housing, mixed with other uses, on Foothill Boulevard and Riverside Avenue? Where else should this type of housing be located?

Every main Street

11. The City of Rialto 2014-2021 Housing Element Mid-Cycle Update established the following goals. What additions or comments do you have on these goals?

- Maintain and improve the quality of existing housing and neighborhoods in Rialto.
- Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.
- Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.
- Alleviate any potential governmental constraints to housing production and affordability.
- Promote equal opportunity for all residents to reside in the housing of their choice.

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12. If you have additional comments or questions, please share here.

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Thank you for taking our survey, please return this to staff to record your responses. Stay tuned for more information about the Plan to House our Rialto and visit www.yourrialto.com/HouseOurRialto!

C.2 Community Survey

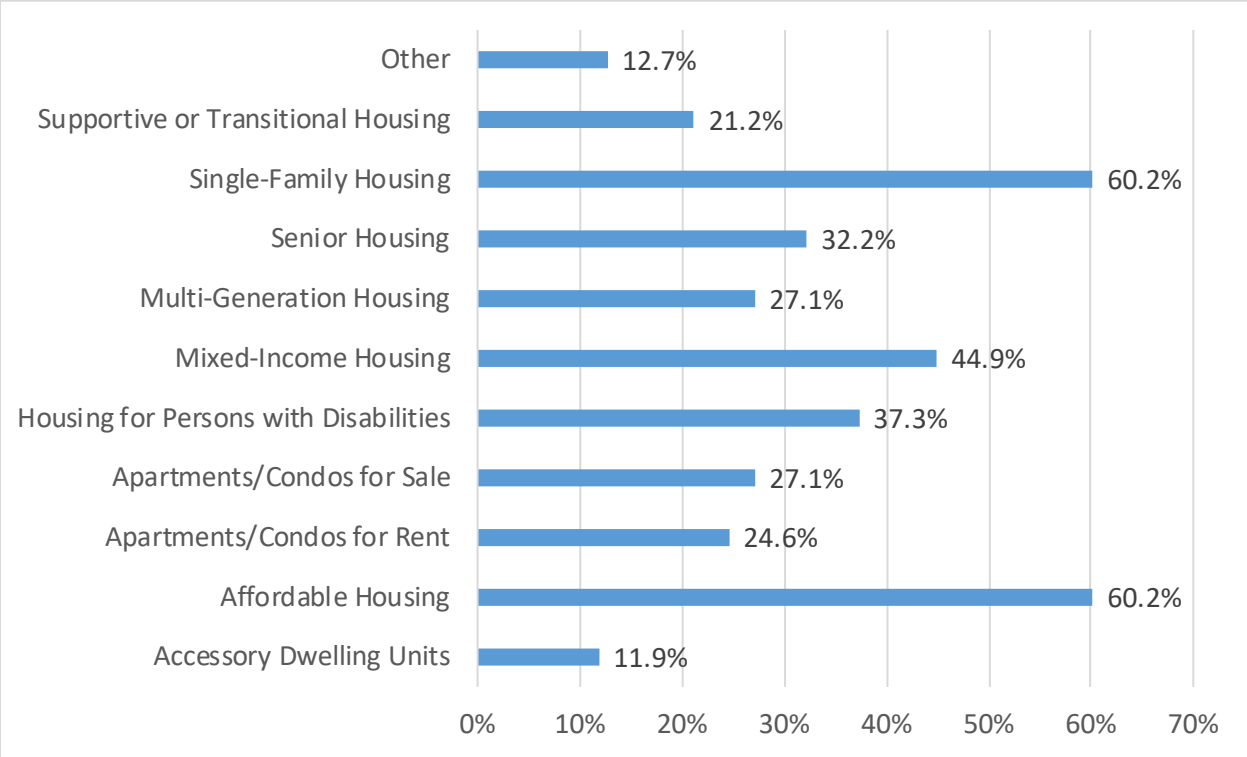
This section contains a survey summary of all collected data. The survey was available in both English and Spanish. A total of 119 surveys were submitted.

Plan to House Our Rialto: 2021-2029 Housing Element Update

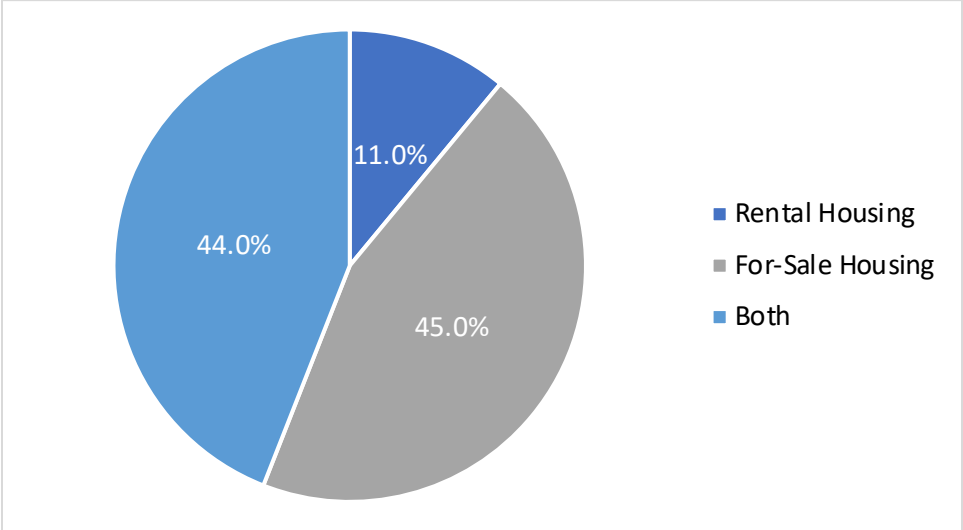
Phase 2: Online Community Survey

On June 14th, 2021, the City released a community survey online to solicit feedback and input on potential locations for housing and on possible housing policies. A total of 119 survey responses were gathered through August 5th, 2021; they are summarized below.

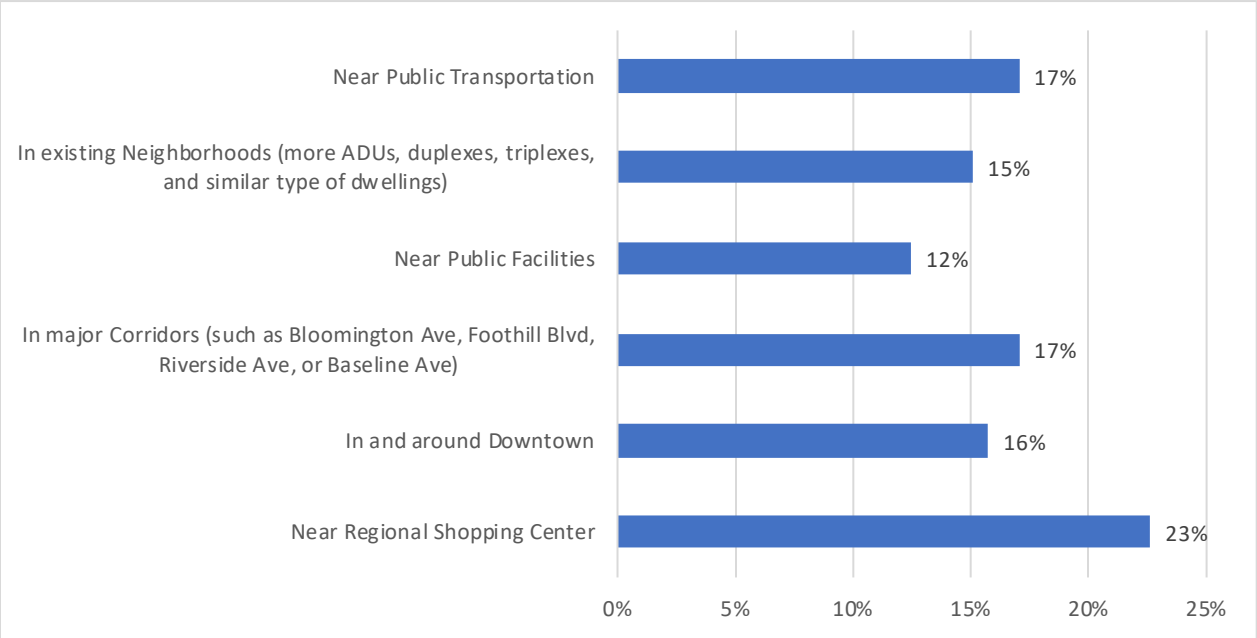
1. What type(s) of housing would you like to see added in Rialto? (Please select all that apply)



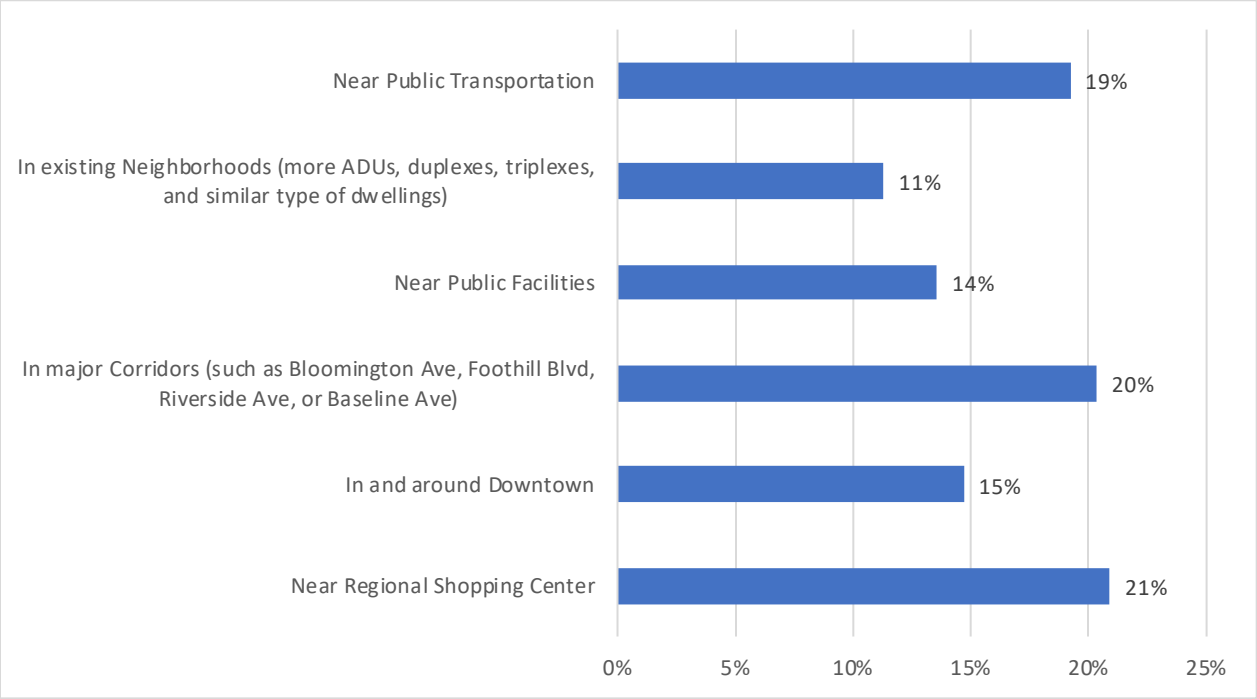
2. Would you like to see more housing units for rent or for sale?



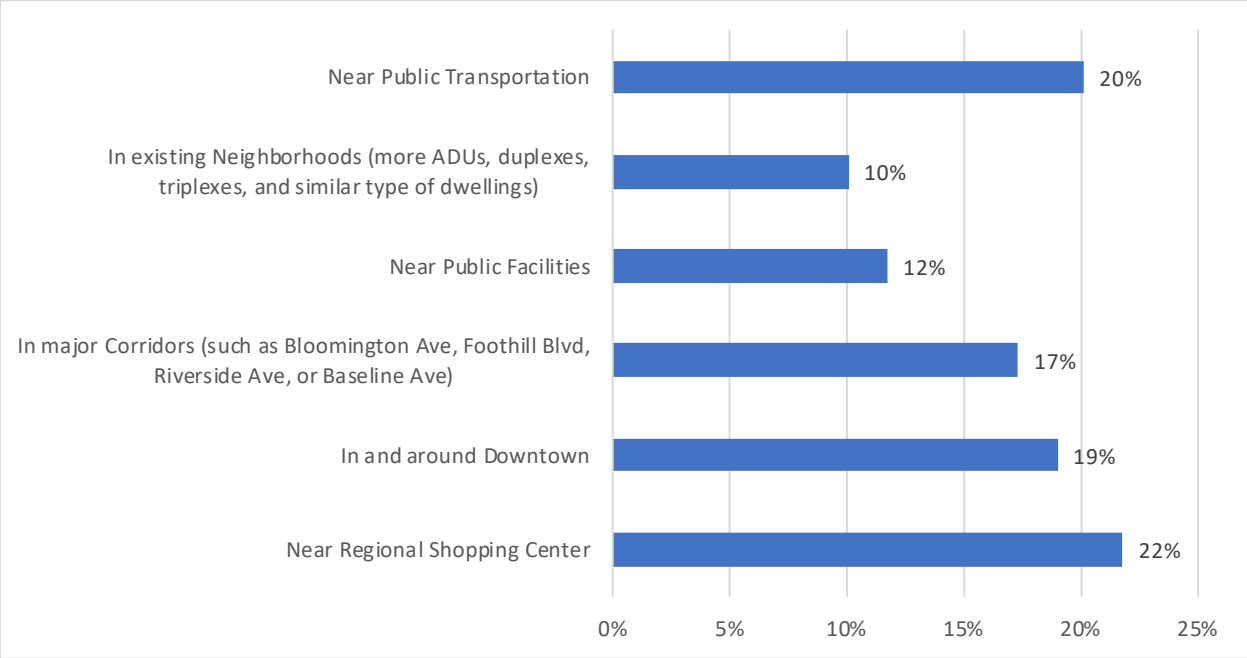
3. What locations are best suited for adding new housing? (Please select all that apply)



4. To accommodate housing for all incomes, the City of Rialto will need to plan for multi-family developments that may exceed 3 stories. What locations are suitable for residential buildings more than 3 stories high?



5. To respond to a variety of lifestyle needs and choices, the City of Rialto may plan for mixed-use housing. Mixed-use housing refers to developments that include residential units along with retail, neighborhood services, public facilities, entertainment, offices, or other uses. What locations are suitable for mixed-use housing?



6. Do you have any recommendations on areas where housing could be added?

Recommendations on Where Housing Could be Added
Near old Rialto airport.
Rancho Verde Golf Course, across from Ayala Park, Riverside Ave. & Sierra Avenue, single family homes in the empty lots near Carter H.S.
North Rialto El Rancho country club
Rialto, has so many areas that are not used, lots, old buildings…all those places should be used
Rialto, Near the new Shopping Center
The empty fields near baseline and fitzgerald.
Apartments townhouse and condos near renaissance
Definitely no additional section-8 needed. Rialto crime rate needs to decrease not increase
Along 210 fwy
By the original Walmart

Recommendations on Where Housing Could be Added
Rialto, Colton, Ontario, rancho Cucamonga, North riverside Ave, etc.
Downtown Rialto, Airport area
Duncan canyon rd.
The wash off of Riverside Avenue
there are areas throughout the City that can be rehabilitated into new housing. or the pockets of vacant land that can help beautify the city with new housing.
I think Baseline and Foothill Blvd's but also Northern Rialto for larger home developments
Near the riverbed on foothill
Areas around Renaissance Marketplace, Land that is north of Baseline Ave (North Rialto).
En los lotes vacantes de la ciudad.
MIXED USE ALONG MAJOR CORRIDORS AND NEAR SHOPPING CENTERS WITH INFILL SFR THROUGHOUT THE CITY. Near schools and public transportation.
Housing through the city, no pockets of poverty that include mixed income housing integration.
By Renaissance and Downtown.
Cedar above Baseline near the Renaissance Market Place.
South end of Rialto to generate economic strength, while updating the city's visual appearance.
Mixed use along major corridors and near shopping centers with infill SFR throughout the city.
Baseline by current homes
Housing through the city, no pockets of poverty that include mixed income housing integration.
Updating electric/lower water. Add more parks.
Riverside Ave and San Bernardino Ave
No mas (casas) viviendas hay demasiadas.
Near schools
On Riverside below Walnut
More around empty locations
Up Riverside Avenue close to 15 fwy & downtown area
On empty lots of land near Ayala & Renaissance -On plots of land near parks
all vacant lots

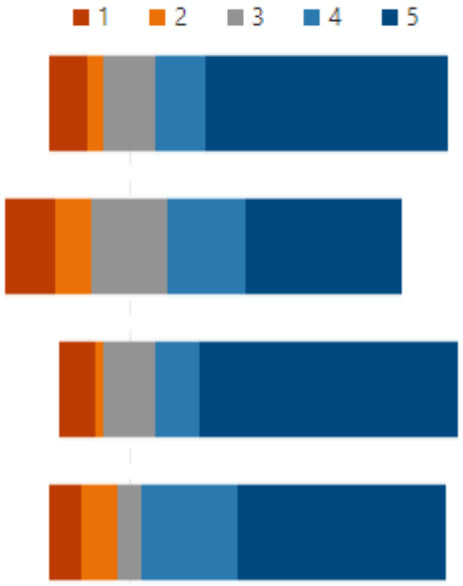
Recommendations on Where Housing Could be Added
En el norte de Rialto, donde hay mas espacios disponibles.
Near the Renaissance Marketplace
Near the Renaissance Shopping area (Rialto Renaissance Marketplace) and the old golf course
Closer to San Bernardino on Foothill Blvd.
The area north by the TaD office
North end of the 210
more housing can be added to areas where there is less traffic for the safety of kids

7. Do you have any recommendations on areas where housing should NOT be added?

Recommendations on Where Housing Should NOT be Added
flood-prone areas
definitely not near companies that service trucking or waste processing, trains, and concrete/dirt plants.
Not near freeways because people later complain about sound and limits expansion in the future.
No transitional housing in current single-family neighborhoods. Those should be built near public transportation and public facilities.
Riverside avenue or baseline
Yes, not in back yards, that will create slums
In or near upper income, existing neighborhoods.
No more low-income housing. Bring back a clean, respectable, attractive city.
Downtown area. The block of Riverside-foothill and Eucalyptus-Merrill
Any area that would actually do more harm than good for the families and individuals already living in that area.
San Bernardino ca
NOT in major corridors. It will make traffic so much worse.
Near parks and current neighborhoods
Riverside dr. To busy already
Downtown. It needs to stay with the older historical housing that speaks to our history and the businesses downtown.
Downtown Historic Area

Recommendations on Where Housing Should NOT be Added
I'm already build neighborhood
Suburban neighborhood
South Rialto. This area is NOT suitable for new housing until the area has been improved. Spend money improving streets, downtown area, and transportation. South rialto is run down and undesirable.
En la section sur del la ciudad donde estan todas las fabricas.
Away from warehouses and major truck routes to keep community safe.
The southern part of Rialto no affordable housing or housing in general should go where there are warehouses. We need to have other community development plan and projects surveyed by the community.
Riverside Avenue is already too busy.
Downtown
Near warehouses!
In the north end.
The southern part of Rialto no affordable housing or housing in general should go where there are warehouses. We need to have other community development plan and projects surveyed by the community.
The southern part of Rialto no affordable housing or housing in general should go where there are warehouses. We need to have other community development plan and projects surveyed by the community.t
NOT near schools
By warehouses, freeways, train tracks!
Downtown
Downtown Rialto -Near poverty stricken/bum infested areas baseline/Jackson street -Near railroad tracks
Lots of vacant lots
En el centro, ya esta muy saturado.
Cercca de bodegas
South of Foothill
Already crowded residential areas
All the open space, our neighborhoods have turned into highways
high traffic and places where there are too many people

8. Community Assistance Policies and Programs - Please rate the following based on importance to the community. (1 being the least important and 5 being the most important)



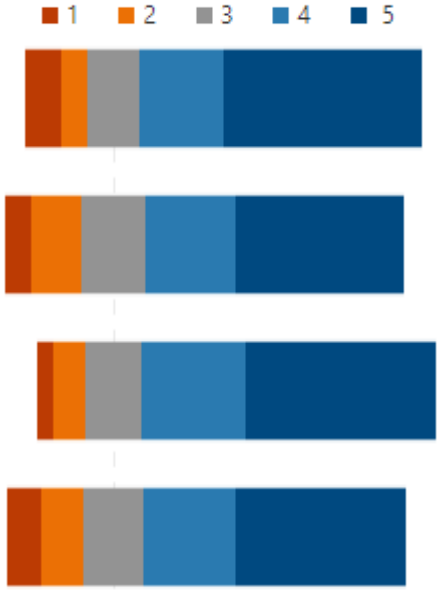
Homebuyers assistance (Identify funding assistance and resources for first time home buyers)

Housing rental assistance (Identify funding assistance for renters)

Property maintenance (Programs to provide funding for home maintenance rehabilitation and upkeep)

Housing information (Information on affordable housing opportunities and funding available to the public)

9. Fair Housing Policies and Programs- Please rate the following based on importance to the community. (1 being the least important and 5 being the most important)



Promote fair housing (Provide programs and policies to address fair housing issues)

Senior Housing Programs (Encourage the development of senior supportive housing)

Persons with disabilities (Encourage the development of housing accessible to persons with disabilities)

Supportive Housing Programs (Provide for emergency, short and long-term housing needs)

10. Please describe your vision of housing in Rialto.

Vision of Housing in Rialto
Senior and new ownership program
diverse mix of home types available which provide more affordable options for the community
It would involve priority being Transitional housing as well as housing for seniors and the disabled.
Homeowners not renters, homeowners take care of their investment.
A mixture of single-family residents and affordable townhomes. Each new community would include lots of plants and nature possibly walking trails and parks. I see a senior community of affordable single-story homes on the Rancho Verde Golf Course land with a fountain, walking trails, and community center. I see multi-generational homes finally being apart of the existing Rialto communities and apart of new communities for younger families. I see transitional housing being a part of the mixed-use community to give them access to public services and public transportation.
Low income housing for families
Possible HOA within the housing since code enforcement is worthless in Rialto, they do a horrible job holding homeowners accountable to upkeep their properties/yards
More Affordable single-family homes and multifamily homes Available assistance for home buyers
I want to see housing for families like mine. Parents (husband deceased) who has two disabled adult children who require 24/7 care from me and my eldest son. Not only do we need housing (for purchase) to fit our family, but we need it with access for the disabled and affordable down payment. I can afford the payments, just getting the down payment is difficult.
Upkeep the houses in the downtown area and make better homes near Las Colinas.
Yes Rialto needs housing. Yet there are problems that needs to be address before building more homes. Homes affordable to match residence to income. Jobs and not just warehouse. Access to quality grocery stores, transportation. Parking, need tow away abandon vehicles make Rialto a more desirable place to live then build from there.
I would love to see some of the vacant land be use for affordable housing and not so many manufacturing buildings.
I would love to see Rialto become a more upscale community with a reputation for having safe, clean neighborhoods, California Distinguished Schools for children of residents and shopping centers and grocery stores that are nicely maintained and conveniently located near housing.
Fair and affordable housing for ALL COMMUNITY MEMBERS focusing MORE on those with credit challenges and/or evictions.
a mixture of single-family homes with larger yards, in some areas and multi-use in areas like Downtown to revitalize that area.
Mixed use downtown; new buildings, mixed use near renaissance. Single family in the north, some townhomes in the Lytle Creek specific plan
Clean, attractive, safe community that does NOT support homelessness or irresponsible residents who chose to live off government aid indefinitely.

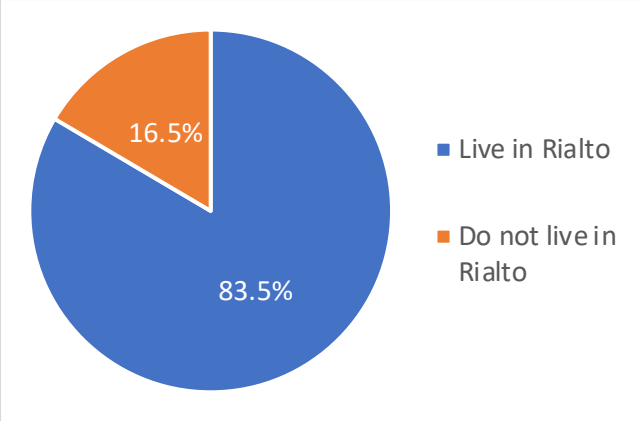
Vision of Housing in Rialto
Rialto would ideally keep its downtown and surrounding blocks original while adding more usable modern updating. (Think Fullerton's downtown). The rest of Rialto would likely want to keep their houses original and kept up to maintain the city's clean appearance. Long term Rialto residents would get assistance in purchasing homes whether it be affordable townhomes or single-family housing
A rialto where families and individuals who have grown up here won't be displaced is an ideal vision for the future. Affordable housing for marginalized groups would surely be beneficial for rialto as a whole.
My vision is Second chance tenants, applicants, for affordable housing, low income. No wait list, have great security, decent credit accepted. No Fee to apply. But deposit required if accepted
Building more homes in the neighborhood area.
I pray we Don return to the mistakes made in the 70 and 80 with low income housing. I feel the failure in housing has come with not enforcement of the code enforcement laws. Property owners should be responsible whither they live in Rialto or somewhere else. If it's yours, you own it. Take care of it. It's called a "Good Neighbor "
Would prefer NO low-income housing. Senior housing is preferred
Naturally people take better care of homes they own vs rentals. More home buying opportunities a must or help with renovation loans to help improve the current/outdated homes.
A tighter community. People taking care of each other. Also making sure each property is well taken care and the city needs to enforce a clean a property/lot/tract.
We need multi-generational housing. More families are taking care of elderly relatives or having young adult relatives live with them. I believe we have a lot of senior housing and I understand the ongoing need. But we need working families living and shopping in Our City. This helps with our growth.
Affordable, good quality and not on top of each other. Decent size lots.
Single story homes
I would like to see programs and funding for our older downtown and historic area renovation of homes. I see this as being one of our main priorities for improving our city. Next, I see new multiuse and condo/apartment housing on our main Blvd's like Foothill and Baseline. I would also like to see new larger homes developed in the norther part of Rialto and the linking of the new housing areas with the historic downtown area of our city.
The more population the more trouble. Let's keep Rialto safe and clean. Rialto is good with building a bright future for our children and let's keep it like that
A city where everyone could have a roof over their head and a safe place to call home regardless of income.
Middle - high housing, update/ improve downtown, improve school system performance/ rating.
Regular single-family homes not bird cages
Multifamily and diversity in needs

Vision of Housing in Rialto
We need at least one homeless shelter we currently have none in rialto.
Single family housing with a yard. MILLENIALS DO WANT HOMES. I hear this all the time that we do not want home, we want to rent. This is a HUGE misconception and incorrect. We want homes with yards however with rising prices of homes and the cost of living and stagnant cost wages, this is just not feasible. Condos and apartments are desirable for this reason but please add patios and outdoor spaces. Many younger generation adults have pets and want to accommodate for such. Housing should be built near beautiful new shopping areas and accessible to public transportation.
I would like to see Rialto continue improvement and development of the city. Rialto could be a place where low income earners could potentially move up the social ladder and potentially stay in Rialto as they do so.
Mi vision es una cuidad que incorpore nuevas viviendas con assistencia para rehabilitar las areas de nuestra ciudad historicas.
Housing priced so the people of Rialto's housing costs are less than 30% of the wages paid to people who work in Rialto.
My vision for Rialto is for the city to be more responsible when it comes to residential and agricultural zoning. Rezoning from residential/agricultural to industrial to allow warehouses to come in must stop. We want to see permanent affordable housing not just renting but have programs in place where families can buy their forever home. Assistance to our houseless population that provides shelter first and services they need to help reincorporate to society. Programs for single parents to afford housing for their families.
More modern housing availability, like mixed use housing/zoning and incorporation and preservation downtown Rialto. For the city to play a role of creating programs for helping its residents build community wealth through homeownership (co-ops, condos, community land trust) Follow up on their mobile homes purchasing program. Housing Element Policy recommendations Have housing throughout the city. Area medium income: Very Low Income, Low Income and Moderate-Income communities to be planned and zoned in a mixed income/integrated community. The city should see itself as an entity that helps build community wealth for permanent affordability housing. For the city to be a resource for providing information and funding assistance for homeownership like mobile home program/manufacturing housing programs that came from the 5th cycle housing element. Mixed use housing in downtown to revitalize downtown Rialto and major corridors. Land inventory: build community wealth and permanent affordability housing/homeownership Also to have strong fair housing policies. Fair Housing recommendation would be for Code Enforcement to be held more accountable to addressing tenant issues with repairs and going after negligent landlords - imposing fees, aggressively pursuing the same way they do code violations committed by underserved communities. Additional Questions:

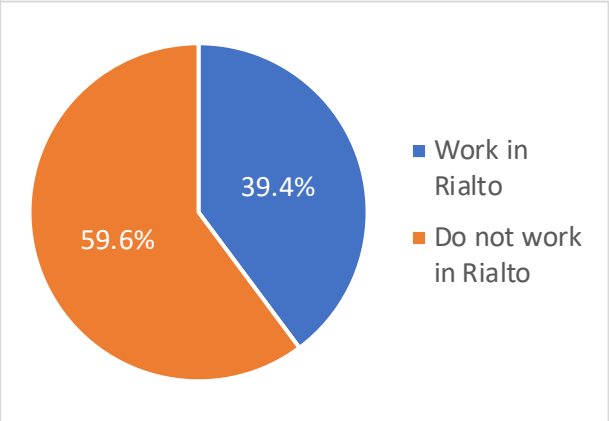
Vision of Housing in Rialto
When will the city amend their zoning code to include state requirements for manufacturing housing based on their programs from the 5th cycle? Any updates of programs or policies related to what needed to get done on the 5th cycle?
Affordable for all incomes
Por favor describe el tipo de viviendas que le gustaria ver en Rialto. --> Please describe the type of housing you would like to see in Rialto.
I would like to see redevelopment in downtown. I used to live in Covina and their downtown area is nice, safe and has plenty to do. A nice downtown can be a great source of tax revenue and give people pride in their city. Downtown Rialto is run down and doesn't seem safe. More mixed-use housing should be built, and two and three story (or more) housing units should build for sale. On a side note I would like to see the schools in Rialto improved too.
Providing sufficient parking for residents. For example, if building a 5-bedroom home, provide parking for 5 or more vehicles. Many new neighborhoods lack sufficient parking.
My vision of housing in Rialto I find it nice.
Rialto seems to be on the rise. So any improvement in housing would be awesome! I like "old" feel of downtown area so don't change that please.
More close theaters. More parks. Entertainment safe places for teens to hangout. Skate parks. More pools for the public.
Smaller homes than a single family can afford.
A strong economic community for all parts of the city that attracts big business brands into our community. Also, a cleaned-up city (South end) in the downtown/Foothill region.
More modern housing availability, like mixed use housing/zoning and incorporation of revitalization and preservation downtown Rialto homes.
More modern housing availability, like mixed use housing/zoning and incorporation and preservation downtown Rialto. For the city to play a role of creating programs for helping its residents build community wealth through homeownership (co-ops, condos, community land trust) Follow up on their mobile homes purchasing program. Housing Element Policy recommendations: Have housing throughout the city. Area medium income: Very Low Income, Low Income and Moderate-Income communities to be planned and zoned in a mixed income/integrated communities. The city should see itself as an entity that helps build community wealth for permanent affordability housing. For the city to be a resource for providing information and funding assistance for homeownership like mobile home program/manufacturing housing programs that came from the 5th cycle housing element. Mixed use housing in downtown to revitalize downtown Rialto and major corridors. Land inventory: build community wealth and permanent affordability housing/homeownership. Also to have strong fair housing policies. Fair Housing recommendation would be for Code Enforcement to be held more accountable to addressing tenant issues with repairs and going after negligent landlords - imposing fees, aggressively pursuing the same way they do code violations committed by underserved communities.

Vision of Housing in Rialto
Additional Questions: When will the city amend their zoning code to include state requirements for manufacturing housing based on their programs from the 5th cycle? Any updates of programs or policies related to what needed to get done on the 5th cycle?
Affordable home well maintained homes more school update schools. parks trees sidewalk fixed. Update electricity power.
There would-be single-family dwellings with big yards and parking on the property, not on the street. Less apartments and multifamily dwellings.
More single-family homes with larger backyards for children to play and pets.
Less homeless encampments
Accessible housing with transportation and sidewalks throughout the entire city. I imagine a hiking trail/running trail in Rialto as well!
Nice welcoming neighborhoods.
More development in the north sectors.
Safe and inclusive
New housing available to responsible individuals, home ownership instead of landlords renting out Rialto properties. Caring for new homes & communities, community enforcing laws to keep communities safe & looking well, less graffiti, abandoned vehicles & pet overpopulation at houses/homes in Rialto.
People can afford their housing and be comfortable and at peace in their home.
Single family neighborhoods Larger complex on main corridors
Me gusteria que personas que actualmente residen en Rialto tengan la oportunidad de comprar propiedades en esta ciudad. Hacer que las propiedades sean mas accesibles para nuestros residentes.
My vision for Rialto is mixed housing throughout the entire city.
Para personas con descapasidades. Para personas mayores. Para primer compradores.
Similar to Fontana, Victoria Gardens
variety of places. CD for all
Double Stories House
Leave it alone - too much eating up the open space that drew us to rialto
My vision for housing is to stop seeing, meeting ex-foster youth out here in the streets maybe not all but the ones who need it
Country Style, Farm, Ranch

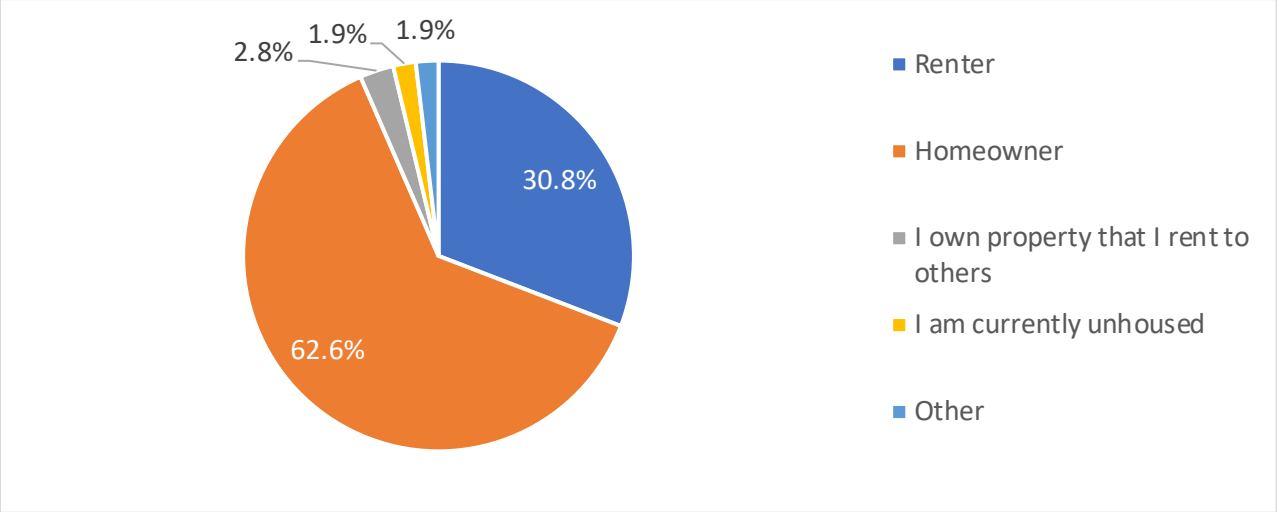
11. Do you live in Rialto?



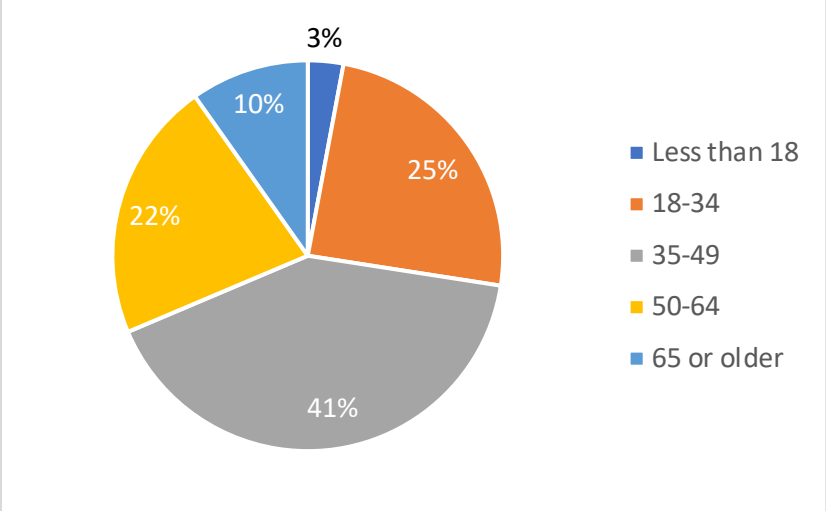
12. Do you work in Rialto?



13. Are you a renter or homeowner?



14. What is your age range?



Phase 2 Community Survey

1. Name: _____

2. Email: _____

3. What types of housing would you like to see added in Rialto?
(Please select all that apply)

- ☐ Accessory Dwelling Units (ADUs)
- ☐ Affordable Housing
- ☐ Apartments/Condos for Rent
- ☐ Apartments/Condos for Sale
- ☐ Housing for Persons with Disabilities
- ☐ Mixed-Income Housing
- ☐ Multi-Generational
- ☐ Senior Housing
- ☐ Single-Family Housing
- ☐ Supportive or Transitional housing
- ☐ Other: _____

_____

4. Would you like to see more housing units for rent or for sale?

- ☐ Rent
- ☐ Sale
- ☐ Both

5. What locations are best suited for adding new housing? (Please select all that apply)

- ☐ Near regional shopping centers
- ☐ In and around downtown
- ☐ In major corridors (such as Bloomington Avenue, Foothill Boulevard, Riverside Avenue, or Baseline Avenue)
- ☐ Near public facilities
- ☐ In existing neighborhoods (more Accessory Dwelling Units, duplexes, triplexes, and similar types of dwellings)
- ☐ Near public transportation

6. To accommodate housing for all incomes, the City of Rialto will need to plan for multi-family developments that may exceed 3 stories. What locations are suitable for residential buildings more than 3 stories high?

- ☐ Near regional shopping centers
- ☐ In and around downtown
- ☐ In major corridors (such as Bloomington Avenue, Foothill Boulevard, Riverside Avenue, or Baseline Avenue)
- ☐ Near public facilities
- ☐ In existing neighborhoods (more Accessory Dwelling Units, duplexes, triplexes, and similar types of dwellings)
- ☐ Near public transportation

7. To respond to a variety of lifestyle needs and choices, the City of Rialto may plan for mixed-use housing. Mixed-use housing refers to developments that include residential units along with retail, neighborhood services, public facilities, entertainment, offices, or other uses. What locations are suitable for mixed-use housing?

- ☐ Near regional shopping centers
- ☐ In and around downtown
- ☐ In major corridors (such as Bloomington Avenue, Foothill Boulevard, Riverside Avenue, or Baseline Avenue)
- ☐ Near public facilities
- ☐ In existing neighborhoods (more Accessory Dwelling Units, duplexes, triplexes, and similar types of dwellings)
- ☐ Near public transportation

8. Do you have any recommendations on areas where housing could be added?

_____

_____

_____

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_____

9. Do you have any recommendations on areas where housing should NOT be added?

_____

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Community Assistance Policies and Programs - Please rate the following based on importance to the community.

(1 being the least important and 5 being the most important)

10. Homebuyers assistance (Identify funding assistance and resources for first time home buyers)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

11. Housing rental assistance (Identify funding assistance for renters)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

12. Property maintenance (Programs to provide funding for home maintenance rehabilitation and upkeep)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

13. Housing information (Information on affordable housing opportunities and funding available to the public)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Fair Housing Policies and Programs - Please rate the following based on importance to the community.

(1 being the least important and 5 being the most important)

14. Promote fair housing (Provide programs and policies to address fair housing issues)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

15. Senior Housing Programs (Encourage the development of senior supportive housing)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

16. Persons with disabilities (Encourage the development of housing accessible to persons with disabilities)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

17. Supportive Housing Programs (Provide for emergency, short and long-term housing needs)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Vision for the Future

18. Please describe your vision of housing in Rialto.

_____

_____

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Thank You!

Thank you for taking the time to provide input on this important update. The following questions will allow us to learn about who is responding to the survey. Your private information will be kept private.

For more information, please check the Plan to House Our Rialto webpage: www.yourrialto.com/HouseOurRialto. If you have any questions about the survey or the Plan to House Our Rialto, please contact Siri Champion by email at schampion@rialtoca.gov or by phone at 909-421-8072.

19. Do you live in Rialto?

- ☐ Yes
- ☐ No

20. Do you work in Rialto?

- ☐ Yes
- ☐ No

21. Are you a renter or homeowner?

- ☐ Renter
- ☐ Homeowner
- ☐ I own property in Rialto that I rent to others
- ☐ I am currently unhoused
- ☐ Other: _____

22. What is your age range?

- ☐ Less than 18 years old
- ☐ 18-34 years
- ☐ 35-49 years
- ☐ 50-64 years
- ☐ 65 years or older

Thank you for taking our survey, please return this to staff to record your responses. Stay tuned for more information about the Plan to House our Rialto and visit www.yourrialto.com/HouseOurRialto!

Fase 2 Encuesta Comunitaria

1. Nombre: _____

2. Email: _____

3. ¿Qué tipo(s) de vivienda le gustaría que se añadieran en Rialto?
(Por favor elija todas las respuestas que apliquen)

- ☐ Unidades de Viviendas Accesorias (ADUs)
- ☐ Viviendas Asequibles
- ☐ Apartamentos/Condominios para Renta
- ☐ Apartamentos/Condominios para Venta
- ☐ Viviendas para Personas con Discapacidades
- ☐ Viviendas para Ingresos Mixtos
- ☐ Multigeneracionales
- ☐ Viviendas para Personas Mayores
- ☐ Unifamiliares
- ☐ Viviendas de Apoyo o Transitorias
- ☐ Otras: _____

_____

4. ¿Ler gustaría ver más unidades de vivienda para renta o para venta?

- ☐ Renta
- ☐ Venta
- ☐ Ambas

5. ¿Cuáles son los sitios más adecuados para añadir nuevas viviendas? (Por favor seleccione todas las respuestas que apliquen)

- ☐ Cerca de centros comerciales regionales
- ☐ Dentro y alrededor del centro
- ☐ En pasillos principales (tales como Bloomington, el Bulevar Foothill, la Avenida Riverside, o la Avenida Baseline)
- ☐ Cerca de instalaciones públicas
- ☐ En vecindarios existentes (Más Unidades de Viviendas Accesorias, duplexes, triplexes, y tipos de viviendas similares)
- ☐ Cerca del transporte público

6. Para acomodar viviendas para todos los ingresos, la ciudad de Rialto deberá planificar desarrollos multifamiliares que superen los 3 pisos. ¿Qué ubicaciones son adecuadas para edificios residenciales de más de 3 pisos de altura?

- ☐ Cerca de centros comerciales regionales
- ☐ Dentro y alrededor del centro
- ☐ En pasillos principales (tales como Bloomington, el Bulevar Foothill, la Avenida Riverside, o la Avenida Baseline)
- ☐ Cerca de instalaciones públicas
- ☐ En vecindarios existentes (Más Unidades de Viviendas Accesorias, duplexes, triplexes, y tipos de viviendas similares)
- ☐ Cerca del transporte público

7. Para responder a una variedad de necesidades y opciones de estilo de vida, la ciudad de Rialto puede planificar viviendas de uso mixto. La vivienda de uso mixto se refiere a desarrollos que incluyen unidades residenciales junto con tiendas minoristas, servicios para el vecindario, instalaciones públicas, entretenimiento, oficinas u otros usos.

¿Qué ubicaciones son adecuadas para viviendas de uso mixto?

- ☐ Cerca de centros comerciales regionales
- ☐ Dentro y alrededor del centro
- ☐ En pasillos principales (tales como Bloomington, el Bulevar Foothill, la Avenida Riverside, o la Avenida Baseline)
- ☐ Cerca de instalaciones públicas
- ☐ En vecindarios existentes (Más Unidades de Viviendas Accesorias, duplexes, triplexes, y tipos de viviendas similares)
- ☐ Cerca del transporte público

8. ¿Tiene alguna recomendación de áreas en dónde puedan añadirse más viviendas?

_____

_____

_____

_____

_____

_____

_____

9. ¿Tiene alguna recomendación de áreas en dónde NO deban añadirse más viviendas?

_____

_____

_____

_____

_____

_____

_____

Políticas y Programas de Asistencia Comunitaria- Por favor califique lo siguiente según la importancia para la comunidad.

(1 es el menos importante y 5 el más importante)

10. Asistencia para compradores de vivienda (Identifique la asistencia financiera y los recursos para compradores de vivienda por primera vez)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

11. Asistencia para el alquiler de viviendas (Identifique la asistencia financiera para inquilinos)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

12. Mantenimiento de la propiedad (Programas para proporcionar fondos para la rehabilitación y el mantenimiento de las viviendas)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

13. Información sobre viviendas (Información sobre oportunidades de viviendas asequibles y financiación disponible para el público)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Políticas y Programas para la Vivienda Justa- califique lo siguiente según la importancia para la comunidad.

(1 es el menos importante y 5 el más importante)

14. Promover la vivienda justa (Proporcionar programas y políticas para abordar los problemas de la vivienda justa)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

15. Programas de Viviendas para Personas Mayores (Fomentar el desarrollo de viviendas de apoyo para personas mayores)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

16. Personas con discapacidad (Fomentar el desarrollo de viviendas accesibles para personas con discapacidad)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

17. Programas de Viviendas de Apoyo (para necesidades de vivienda de emergencia, a corto y largo plazo)

☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Visión para el Futuro

18. Por favor describa su visión para la vivienda en Rialto.

_____

_____

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¡Gracias!

Gracias por tomarse el tiempo para brindar información sobre esta importante actualización. Las siguientes preguntas nos permitirán conocer quién está respondiendo a la encuesta. Su información privada se mantendrá privada.

Usted puede obtener más información en el sitio web del proyecto: www.yourrialto.com/HouseOurRialto. Si tiene alguna pregunta sobre la encuesta o la Actualización del Elemento de Vivienda, por favor comuníquese con Siri Champion por correo electrónico a schampion@rialtoca.gov o por teléfono al 909-421-8072.

19. ¿Vive usted en Rialto?

- ☐ Sí
- ☐ No

20. ¿Trabaja usted en Rialto?

- ☐ Sí
- ☐ No

21. ¿Es usted arrendatario o propietario?

- ☐ Arrendatario
- ☐ Propietario
- ☐ Soy propietario en Rialto y rento a otros
- ☐ Actualmente no tengo vivienda
- ☐ Otras: _____

22. ¿Cuál es su rango de edad?

- ☐ Menor de 18 años
- ☐ 18-34 años
- ☐ 35-49 años
- ☐ 50-64 años
- ☐ 65 o Mayor de 65 años

Gracias por participar en nuestra encuesta, por favor devuélvala al personal para registrar sus respuestas. Manténgase en contacto para recibir más información acerca del Plan de Viviendas para Nuestro Rialto y visite el sitio web www.yourrialto.com/HouseOurRialto!

C.3 City Council Meeting

This section contains all materials available for the July 13, 2021, City Council meeting. A recording of the meeting is available on the City's website.

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REGULAR MEETING
of the
CITY OF RIALTO
CITY COUNCIL
City of Rialto, acting as Successor Agency to the Redevelopment Agency

MINUTES
July 13, 2021

A regular meeting of the City Council of the City of Rialto was held in the City Council Chambers located at 150 South Palm Avenue, Rialto, California 92376, on Tuesday, July 13, 2021.

0o0

This meeting was called by the presiding officer of the Rialto City Council in accordance with the provisions of Government Code §54956 of the State of California.

0o0

CALL TO ORDER

Mayor Robertson called the meeting to order at 5:00 p.m.

0o0

The roll was called, and the following were present: Mayor Deborah Robertson, Mayor Pro Tem Ed Scott, Council Member Rafael Trujillo, Council Member Andy Carrizales and Council Member Karla Perez.

Also present were City Manager Marcus Fuller, City Attorney Eric Vail, and City Clerk Barbara McGee.

City Treasurer Edward Carrillo was absent.

0o0

CLOSED SESSION

1. CONFERENCE WITH REAL PROPERTY NEGOTIATORS
   Pursuant to Government Code section 54956.8
   Property: : 1432 S. Riverside Avenue, Rialto, CA 92376
   Agency Negotiator: City Manager Marcus Fuller;
   City Attorney Eric Vail
   Negotiating Parties: NewMark Merrill Companies, LLC;
   City of Rialto
   Under Negotiation: Price and Terms of Sale

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CLOSED SESSION

2. CONFERENCE WITH REAL PROPERTY NEGOTIATORS
   Pursuant to Government Code section 54956.8
   Property: 261 S. Palm Avenue
   Agency Negotiator: City Manager Marcus Fuller;
   City Attorney Eric Vail
   Negotiating Parties: The Forum Blues Cafes (Terrance Harper);
   City of Rialto
   Under Negotiation: Price and Terms of Lease

3. CONFERENCE WITH LEGAL COUNSEL –
   ANTICIPATED LITIGATION
   Significant exposure to litigation Pursuant to
   Government Code section 54956.9(d)(2)
   Number of matters: three (3)

4. CONFERENCE WITH LEGAL COUNSEL –
   EXISTING LITIGATION
   Pursuant to Government Code section 54956.9(d)(1)
   Name of Case: Cynthia Balderas v. City of Rialto, CIV SB 2105830

5. CONFERENCE WITH LABOR NEGOTIATORS
   Pursuant to Government Code section 54957.6
   Agency Designated Representatives: City Manager Marcus Fuller
   Employee Organizations:
   - City Government Management Association
   - Rialto Fire Management Association
   - Rialto Mid-Management & Confidential Employee's Association
   - Rialto Policy Benefit Association – Management
   - Rialto City Employee's Association
   - Rialto Police Benefit Association – General
   - Rialto Professional Firefighters of California - Local 3688
   - Executive Management Team
   - Management Unrepresented Employees
   - Unrepresented Employees

0o0

Motion by Council Member Trujillo, second by Council Member Perez and carried by 5-0 vote to go into Closed Session at 5:02 p.m.

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City Council returned from Closed Session at 6:36 p.m.

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CALL TO ORDER

Mayor Deborah Robertson called the meeting to order at 6:45 p.m.

0o0

The roll was called, and the following were present: Mayor Deborah Robertson, Mayor Pro Tem Ed Scott, Council Member Rafael Trujillo, Council Member Andy Carrizales and Council Member Karla Perez. Also present were City Manager Marcus Fuller, City Attorney Eric Vail, and City Clerk Barbara McGee.

City Treasurer Edward Carrillo was present via Zoom.

0o0

Pledge of Allegiance and Invocation

Council Member Karla Perez led the Pledge of Allegiance.

Pastor Harry Bratton – Greater Faith Grace Bible Church

0o0

City Attorney's Report on Closed Session

1. CONFERENCE WITH REAL PROPERTY NEGOTIATORS
   Pursuant to Government Code section 54956.8
   Property: : 1432 S. Riverside Avenue, Rialto, CA 92376
   Agency Negotiator: City Manager Marcus Fuller;
   City Attorney Eric Vail
   Negotiating Parties: NewMark Merrill Companies, LLC;
   City of Rialto
   Under Negotiation: Price and Terms of Sale

2. CONFERENCE WITH REAL PROPERTY NEGOTIATORS
   Pursuant to Government Code section 54956.8
   Property: 261 S. Palm Avenue
   Agency Negotiator: City Manager Marcus Fuller;
   City Attorney Eric Vail
   Negotiating Parties: The Forum Blues Cafes (Terrance Harper);
   City of Rialto
   Under Negotiation: Price and Terms of Lease

3. CONFERENCE WITH LEGAL COUNSEL –
   ANTICIPATED LITIGATION
   Significant exposure to litigation Pursuant to
   Government Code section 54956.9(d)(2)
   Number of matters: three (3)

.

4. CONFERENCE WITH LEGAL COUNSEL –
   EXISTING LITIGATION
   Pursuant to Government Code section 54956.9(d)(1)
   Name of Case: Cynthia Balderas v. City of Rialto, CIV SB 2105830

City Attorney's Report on
Closed Session

5. CONFERENCE WITH LABOR NEGOTIATORS
   Pursuant to Government Code section 54957.6
   Agency Designated Representatives: City Manager Marcus Fuller
   Employee Organizations:
   - City Government Management Association
   - Rialto Fire Management Association
   - Rialto Mid-Management & Confidential Employee's Association
   - Rialto Policy Benefit Association – Management
   - Rialto City Employee's Association
   - Rialto Police Benefit Association – General
   - Rialto Professional Firefighters of California - Local 3688
   - Executive Management Team
   - Management Unrepresented Employees
   - Unrepresented Employees

City Attorney Vail stated that the City Council was able have a discussion and give direction on each of the five items. There was no reportable action on any of the five items.

0o0

PRESENTATIONS AND PROCLAMATIONS

Introduction of New Employee by City Manager Marcus Fuller City Engineer - David Hammer

Certificate of Recognition to Azyah Rice for Wrestling Championship - Mayor Robertson

0o0

ORAL COMMUNICATIONS

None.

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City Council to Consider removing or continuing any items on the agenda

Mayor Robertson abstained from Voucher 218721 from Warrant Resolution No. 51 (07/01/2021) made out to the National Council of Negro Women.

0o0

E.4 Water Infrastructure Finance Innovation Act Program

Council Member Trujillo would like to pull Item E.4 for discussion.

He asked at what point are we going to start working on helping residents with that particular infrastructure.

0o0

Tom Crowley, Utilities Manager, stated some areas were identified that could be converted from septic to sewer. It's finding the design and the financial ability to install the infrastructure to get to the homes. The WIFIA application is for innovative-type projects in water and wastewater and the reason for the four projects identified and further along in the process than we're at with septic to sewer.

0o0

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E.4 Water Infrastructure Finance Innovation Act Program

Council Member Trujillo stated that is a good clarification.

0o0

Mr. Crowley stated we're still pursuing grant funding for some of projects that we got identified for the septic to sewer and continue to figure out how to install the infrastructure to get to those residents.

0o0

Mayor Robertson asked how many of the Rialto residents are on septic and what our process is. We have talked about it. We were provided a grant to review. This may be good opportunity to partner with the County on this application for the infrastructure in the Rancho Verde area. We already have a major project. And we won't be able to carry that. I would love to have a robust application. If we counted those numbers we can improve water quality in our region, but we could not afford the bill.

0o0

Council Member Trujillo stated the focus is on the Linden/Carter neighborhood.

0o0

Mr. Crowley stated we got that identified to go after that with the Proposition 1.

0o0

CONSENT CALENDAR

A. WAIVE FULL READING OF ORDINANCES

1. Waive reading in full, all ordinances considered at this meeting.

0o0

B. APPROVAL OF WARRANT RESOLUTIONS

B.1 Warrant Resolution No.50 (06/24/2021)

B.2 Warrant Resolution No.51 (07/01/2021)

B.3 Warrant Resolution No.52 (07/08/2021)

0o0

C. APPROVAL OF MINUTES

C.1 Regular City Council Meeting - June 8, 2021

C.2 Regular City Council Meeting - June 22, 2021

0o0

D. CLAIMS AGAINST THE CITY

Adrian Jones - Vehicle Damage

0o0

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TAB 4
Second Amendment to the Professional Services Agreement Between City of Rialto and Bureau Veritas North America, Inc. for Building Official Services

Mayor Pro Tem Scott stated we need to speak with the former Interim City Manager and ask why it was allowed to happen.

0o0

Mayor Robertson asked or did Mr. Hamilton inform the Interim City Manager.

0o0

Mayor Pro Tem Scott recommended anything that is not currently in plan check at Veritas will go somewhere else tomorrow. New plan checks go with somebody that can be negotiated based on the four or five proposals. And we continue with the contract with Trang Huynh.

0o0

Mayor Robertson requested the total workload in the plan checks. How long they have been there, status, number of reviews. If more than two, it needs to return to the applicant.

0o0

Motion by Mayor Pro Tem Scott, second by Council Member Trujillo and carried by a 4-1 vote to Continue the contract with Trang Huynh until the new person is in place. Any remaining plan checks at Veritas currently not being plan checked will be collected tomorrow along with any new plan checks and sent to a new contract vendor selected by Mr. Fuller based on the four proposals in place. Mr. Fuller has the City Council's authorization to negotiate that on a short-term basis until all proposals are back before the City Council and enter into a contract.

Mayor Robertson voted no.

0o0

TAB 5
Plan to House Our Rialto:2021-2029 Housing Element Update

Siri Champion, Senior Planner and Dave Barquist with Kimley-Horn & Associates presented staff report to Request City Council to Discuss the "Plan to House Our Rialto: 2021-2029 Housing Element Update" Presentation.

0o0

Public Comment

Marven Norman with CCAEJ Center for Community Action and Environmental Justice expressed his support with the Plan. He wanted to make certain that the housing and zoning provided will not infringe any new injustices.

0o0

Jeffrey Scott with Southwest Regional Council of Carpenters recommended hiring local, skilled and trained workforce because of its impact it can do on the community.

0o0

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TAB 5
Plan to House Our Rialto:2021-2029
Housing Element Update

Ana Gonzalez with Center for Community Action and Environmental Justice, CCAEJ, complimented Siri Champion and her team for being accessible and engaging with the community. She is impressed with the site location but expressed concerns with low-income housing in close proximity to freeways. They look forward to continue working with Siri and providing input from the community. She thanked the City Council for taking this matter seriously and moving in the right direction.

0o0

Maribel Nuñez provided a written statement and will be kept on file.

0o0

Mayor Pro Tem Scott asked about more opportunities north of the 210 Freeway.

0o0

Ms. Champion stated she will defer to Mr. Barquist. However, there are very specific State requirements for candidate sites. Rialto falls short north of the 210 Freeway.

0o0

Mayor Pro Tem Scott asked what the criteria is.

0o0

Mr. Barquist stated as part of the process of identification of sites, there's a Goldilocks provision. Not too big; not too small. There's an issue related to some of the sites that are in specific plan areas that are still in need in being brought into the City through the process of annexation. Some of those issues that will preclude that. We want to note that in the specific plan or other areas, for example, north of 210 Freeway, those are existing opportunities that are reflected in the policies that you have of available sites, so the sites that you see in the areas just are to get the remaining pieces of that.

Mr. Barquist stated that you still have opportunities of growth and residential above the 210 Freeway, but it's not a new or revised policy. It's existing policy that you have.

0o0

Mayor Pro Tem Scott stated he is not certain he understands what was communicated. He believes there are smaller sites north of the 210 Freeway. To say everything needs to happen south of the 210 Freeway sends a bad message to this community. He requested to look deeper north of the 210 Freeway.

He inquired about Opportunity Area 1 – Foothill Boulevard. Everything in the blue has the potential of being housing, correct?

0o0

Mr. Barquist stated it will be evaluated as a site for opportunity, yes.

0o0

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TAB 5
Plan to House Our Rialto:2021-2029
Housing Element Update

Mayor Pro Tem Scott asked if there is existing businesses along there, they will be rezoned as potential housing. Will there be an overlay?

0o0

Mr. Barquist stated it can be done in both ways. There are considerations that you can have in the next interim period as you adopt zoning as you preserve existing foundational policy. Overlay adds on residential opportunities.

0o0

Mayor Pro Tem Scott asked if you own a business in a blue area, does the owner have an opportunity to build housing or keep it as commercial property.

0o0

Ms. Champion stated the Foothill Boulevard Specific Plan currently reads, residential is allowed in all the blue parcels. The change for the housing element would be to increase the allowed density for projects that are smaller size.

0o0

Mayor Pro Tem Scott stated that there is a perception in the community that these areas picked will be forced to build housing on them and eliminate what's currently on them. I want to make certain that's not accurate.

0o0

Ms. Champion stated you are correct. That is not accurate.

0o0

Mayor Pro Tem Scott stated that message is out in the community, and I have received many calls about it.

0o0

Mayor Pro Tem Scott inquired about Opportunity Area 2 – North Riverside Avenue. If that property, a church, chose to sell it, somebody could build housing on it, but the church is not going to be forced to sell the property.

0o0

Ms. Champion stated correct. The church would not be forced to sell the property. Existing uses would remain legal. They would not be expected to change. The reason churches were included in these opportunity sites, is that in other communities' churches are finding themselves having a difficult time with their revenues due to decreases in participation in local churches. Churches are choosing to add housing to their sites to have new constituencies to their sites.

0o0

TAB 5
Plan to House Our Rialto:2021-2029
Housing Element Update

Mayor Pro Tem Scott stated on the west side where there is a water tank. Is it suggested we remove a water tank to build houses?

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Ms. Champion stated we will review and remove that.

0o0

Mayor Pro Tem Scott inquired about Opportunity Area 3 & 4 – Gateway Specific Plan. He's not sure the property will accommodate 251 units. Developers are estimating 150 to 200 units. He asked if there is anything from keeping us from allowing a developer to build 150 housing units versus 251 units.

0o0

Ms. Champion stated there is not. Mr. Barquist will expand on that. The potential to address is no net loss.

0o0

Mr. Barquist stated that if there is a site identified for "X" number of units, you will have to make up for that deficiency somewhere else. At the point that it is approved, you have to demonstrate that the remaining sites that you have in your community can accommodate your unaccommodating need at that point in time.

0o0

Mayor Pro Tem Scott inquired on Opportunity 5 – Central Area. There's an overlay over the Metrolink Station. Is there a possibility to build houses in the Metrolink Station parking lot.

0o0

Ms. Champion, stated those are City owned.

0o0

Mayor Pro Tem Scott stated I don't believe the parking lot is City owned. I think Metrolink owns the parking lot.

0o0

Ms. Champion stated she will double check.

0o0

Mayor Pro Tem Scott stated some properties may have been missed north of the tracks that are not indicated on the slide including Orange Avenue.

0o0

Ms. Champion stated we will look into it. It is possible that some sites have been identified in the fifth cycle. The opportunity areas for discussion tonight are new opportunities.

0o0

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TAB 5
Plan to House Our Rialto:2021-2029
Housing Element Update

Mayor Pro Tem Scott stated he is glad that was brought up.

0o0

Council Member Trujillo asked how market forces play into the arena allocation.

0o0

Ms. Champion stated the City is only responsible for creating opportunity for development. How it gets developed is up to the property owner.

0o0

Mr. Barquist explained further market forces.

0o0

Council Member Trujillo asked if there is a notification process to inform owners they're in an opportunity zone.

0o0

Ms. Champion stated if it is the pleasure of the City Council to begin reaching out to property owners, they can. When the plan amendments take place, zone changes, at that point, the City will be notifying property owners.

0o0

Council Member Trujillo stated he understands the challenges building north of the 210 Freeway, have those areas been captured in the previous plan.

0o0

Ms. Champion stated yes. That is the reason why the slide does not show north of the 210 Freeway in the five opportunity areas because we do have fifth cycle sites that are located north of the 210 Freeway.

Council Member Trujillo asked if shopping centers are magnets for opportunity zones.

0o0

Ms. Champion stated it is a preference seen and feedback received from community members.

0o0

Council Member Trujillo stated Baseline Avenue is also a business corridor but have not been seen as a focus of an opportunity zone.

0o0

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TAB 5
Plan to House Our Rialto:2021-2029
Housing Element Update

Ms. Champion stated they are open to any suggestions. It has not been recommended from the input received. Baseline Avenue does not have larger parcels or parcels likely to redevelop in the planning period. We can continue to study Baseline and return with more options if they become available.

0o0

Council Member Perez asked once categories are identified and opportunities are created, will owners have a set category that they are supposed to be set for.

0o0

Mr. Barquist stated yes and no. The State law provisions require to identify the assumed affordability when sites are identified. Ideas and assumptions are made at the forefront. The law cannot mandate developers affordability, but you still have to have a finding to makeup for that somewhere else.

0o0

Council Member Carrizales asked about feasibility studies on housing within shopping centers.

0o0

Ms. Champion stated there are examples that discuss repurposing older shopping centers. Foothill Boulevard is part of an idea that could happen. We can provide examples.

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Council Member Carrizales suggested renovating older shopping centers to create a new environment. He believed all the zones identified were great and thanked Ms. Champion for her work.

0o0

City Attorney Vail clarified as it relates to opportunity zones. I want to make sure we are not talking about these areas becoming Federal opportunity zones that have preferable tax treatment. That's not what we're talking about, correct.

0o0

Mayor Robertson stated they are not. The one on Valley would be some concerns because of the proximity to the freeway.

She asked for clarification on the 8,000 plus unit designation and its income level category distribution across the metrics.

0o0

Ms. Champion stated that 8,000 plus number is distributed across all four different income categories from very low income to above moderate income, which is the full spectrum.

0o0

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TAB 5
Plan to House Our Rialto:2021-2029
Housing Element Update

Mayor Robertson requested to see what was captured in the fifth cycle. She inquired on Opportunity Area 2 – North Riverside Avenue and asked how does the coordination occur when you have old water infrastructure, and it is not under our jurisdiction since most of the water infrastructure north of Baseline Avenue is under the West Valley Water District. How do we coordinate when those projects happen? How do we ensure that they will address their old water infrastructure? We can only assure that our water infrastructure is addressed south of Baseline. We need to think about those things when you have multiple jurisdictions servicing the community.

0o0

Ms. Champion stated there are two points in which to address the concerns. If we learn of infrastructure problems that would seem to be insurmountable that would make development within the next eight years infeasible, we could take that off the list. In terms of going through the development process, we would look at infrastructure during the entitlement process and coordinate utilities at that point in time.

0o0

Mayor Robertson asked how many participants in the City from a 111,000 population have you had in this process. Ten? Five? One percent participation?

0o0

Ms. Champion stated that for a project like this, cities across the State will clamor to obtain one percent participation. Over 500 residents were contacted directly by mail and 30 community-based organizations were invited. Approximately, 50-85 participants responded between surveys. More participation is expected from Spanish speaking participants who have not been as active.

0o0

Mayor Robertson encouraged the community to participate in the workshop. She also asked about the “free parking” reference.

0o0

Ms. Champion stated the “free parking” comment came from a range of comments from the participants from “Your Vision for the Future of Rialto”. It was part of a wide-range of comments in that category that may not have been related.

0o0

Council Member Trujillo stated in this area inter-generational homes with multiple families are common which make parking a problem. Was that taken into account when housing numbers were created?

0o0

Mayor Pro Tem Scott stated no. It reduces the parking.

0o0

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TAB 5
Plan to House Our Rialto:2021-2029 Housing Element Update

Council Member Trujillo stated everyone has cars. The public transportation is not the same as other bigger cities.

0o0

Ms. Champion stated no. Proximity to transit is one the features aimed for intended to help resolve transportation issues.

0o0

Mayor Pro Tem Scott believed property owners need to be contacted sooner than later and inform them of what is being suggested.

0o0

Council Member Perez reiterated Mayor Pro Tem Scott's suggestion that the property owners need to be informed in a timely manner.

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Ms. Champion extended her assistance to the public to bring better understanding of the project.

0o0

Mayor Robertson requested a distribution of those who have participated to be able to increase participants and make others aware of the conversation.

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TAB 6
Service Agreement with Soto Resources to Provide a Funding Research for Lake Rialto Project and As-Needed Grant Writing Assistance for Utility Authority and Utilities Division

Marcus Fuller, City Manager, presented staff report to Request City Council/Rialto Utility Authority Board to Approve the Professional Services Agreement with Soto Resources to Provide a Funding Research and Strategy Report for the Lake Rialto Project and As-Needed Grant Writing Assistance for Rialto Utility Authority and Utilities Division in an Amount Not to Exceed $50,250.

0o0

Council Member Trujillo asked if Waterwise Community Center is what was being thought of for the Lake Rialto Project.

0o0

Mayor Robertson stated there is an opportunity for the facility we would be able to have. The San Joaquin Marsh is an area for an educational platform.

0o0

Council Member Trujillo shared he has visited the Chino Basin Conservation District and envisions something like that with this project.

0o0

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TAB 15
Continued Local Emergency COVID-19 Outbreak

City Manager Marcus Fuller presented staff report to Request City Council to Receive an Update on, Confirm the Continued Existence of, and Provide any Further Direction in Relation to the Local Emergency Throughout the City of Rialto in Response to the COVID-19 Outbreak.

0o0

Council Member Trujillo gave an update on State COVID-19 funds. He reported $625,000 which turned out to be $1.2 million and approved in the last City budget. He stated the City will receive gain benefit in the near future.

0o0

Motion by Council Member Perez, second by Council Member Trujillo and carried by a 5-0 vote to Receive an Update on, Confirm the Continued Existence of, and provide any further direction in relation to the Local Emergency Throughout the City of Rialto in Response to the COVID-19 Outbreak.

0o0

REPORTS

The City Council gave their reports.

0o0

ADJOURNMENT

Motion by Mayor Pro Tem Scott second by Council Member Perez and carried by a 5-0 vote to adjourn the City Council Meeting at 11:18 p.m.

Deborah Robertson

MAYOR DEBORAH ROBERTSON

ATTEST:

Barbara A. McGee

CITY CLERK BARBARA A. McGEE

Plan to House Our Rialto:

2021-2029 Housing Element Update

City Council Study Session – June 23, 2021

Agenda

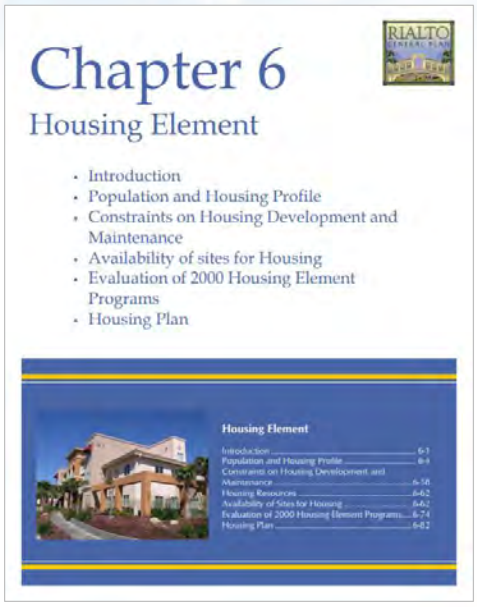
- Background
  - Housing Element Background
  - Community Engagement
- Sites Analysis
- Next Steps

Background

Housing Element Background

- Required element of the City's General Plan
- Requires adoption by the State Department of Housing and Community Development (HCD)
- Updated on 8-year cycles
- Requires a General Plan Amendment and at least one public hearing by Planning Commission and City Council

- Statutory Deadline: October 15, 2021
  - 120-day grace period beyond October 15


Chapter 6

Housing Element

- Introduction
- Population and Housing Profile
- Constraints on Housing Development and Maintenance
- Availability of sites for Housing
- Evaluation of 2000 Housing Element Programs
- Housing Plan

New Legislation for Housing Elements

- **Funding Measures**:
  - SB 2
  - SB 3
- **Streamlining Measures**:
  - SB 35
  - SB 540
  - AB 73
  - AB 2753
  - SB 765
  - SB 330
  - AB 1485
  - SB 744
- **Accountability Measures**:
  - SB 167
  - AB 678
  - AB 1515
- **ADU Measures:**
  - AB 68
  - AB 881
  - SB 13
  - AB 587
  - AB 670
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- **Other Measures**:
  - AB 1505
  - AB 879
  - AB 1397
  - AB 72
  - AB 2372
  - SB 1227
  - AB 2797
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  - SB 765
  - And more

Housing Element Components

- Population and housing profile
- Evaluation of housing constraints and resources
- Evaluation of current programs and policies
- Analysis and identification of sites to accommodate the City's RHNA allocation
- Policies, programs, and quantified objectives to achieve the City's identified housing goals

Rialto 2021-2029 RHNA Allocation

Income Category	% of Area Median Income (AMI)	Income Range[1]		RHNA Allocation (Housing Units)
		Minimum	Maximum	
Very Low Income	0 - 50% AMI	--	$38,750	2,218 units
Low Income	51 – 80% AMI	$38,751	$62,000	1,206 units
Moderate Income	81 – 120% AMI	$62,001	$93,000	1,371 units
Above Moderate Income	>120% AMI	$93,001	--	3,477 units
			TOTAL:	8,272 units

1. Income range is based on the 2021 HUD Area Median Income (AMI) for San Bernardino County of $77,500 for a family of 4.

Housing Element Certification

What Does it Mean to Have a "Certified" Housing Element?

- Reviewed for compliance with state law by the Department of Housing and Community Development (HCD)
- "Certification" demonstrates substantial compliance with state law

Benefits of Certification

- Access to state-sponsored grants and alternative funding sources
- Protects the City from state penalties and fines due to non-compliance

Certification Non-Compliance

- Non-compliance risks:
  - Potential loss of eligibility for certain future State grant funds
  - Potential loss of some level of local control over development
  - A court may suspend the City's authority to issue building permits or other approvals
  - HCD may forward a noncompliance case to the California Office of the Attorney General
  - Outside groups may sue the City for a non-compliant Housing Element

Affirmatively Furthering Fair Housing (AFFH)

- Fair and equitable distribution of housing throughout the community
- Protects against communities being overburdened
- Takes into consideration:
  - A variety of housing types (single-family house, apartment, townhome, etc.)
  - Mix of affordability levels
  - Access to transportation and employment
- Considers access to public transit and community resources

Community Engagement

Summary of Outreach Efforts

- Completed Outreach:
  - Virtual community workshop on May 19th, 2021
  - Self-Guided Workshop - in person and online
  - Informational postcards sent to the community
  - Community surveys – in person and online
    - In progress
- Spanish translations provided
- Online advertising on social media and the City's website

PLAN DE VIVIENDAS EN NUESTRO RIALTO

6º Ciclo de la Actualización del Elemento de Vivienda de la Ciudad de Rialto

La ciudad está actualizando el Elemento de Vivienda para los años 2021-2029.
¡Trabajemos juntos para hacerlo Nuestro Plan!

El Elemento de Vivienda es el plan de la ciudad para adaptarse a las necesidades de vivienda de los residentes actuales y futuros de todos los niveles de ingreso en Rialto.

- Embarcarse en una serie de oportunidades de participación para escuchar su opinión,
- Revisar las normas y programas de vivienda actuales de la ciudad
- Analizar las condiciones de vivienda existentes y terrenos que se puedan adaptar para nuevas viviendas, y
- Actualizar el plan de vivienda de la ciudad para reflejar las necesidades de Rialto y crear oportunidades para el desarrollo residencial privado

¿Cuáles son las fechas para participar? Vea los horarios a continuación:

abril-mayo	Taller Comunitario #1 - mayo 19 - junio 6
mayo-julio	Mapa interactivo y encuesta en línea - junio 14-27
julio-agosto	Taller Comunitario #2 - julio 15 - 30
agosto-octubre	Revisión Pública del Documento para Comentarios - sep. 2021

Para obtener más información y registrarse para recibir mensajes por correo electrónico, visite el sitio web de la ciudad: www.yourrialto.com/HouseOurRialto

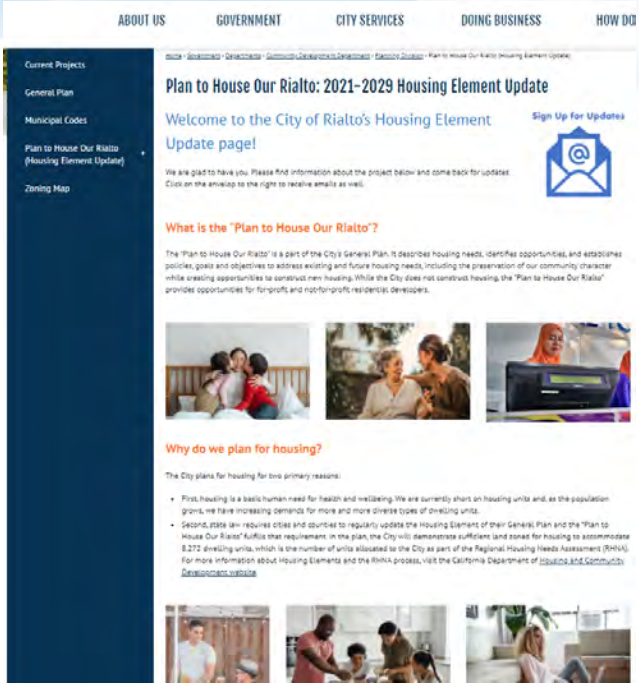
¡La ciudad necesita sus ideas y aportes!

Virtual Community Workshop

- Date: May 19, 2021
- Spanish translation available
- Overview:
  - Housing Element Update Process
  - Baseline demographics and housing data
  - Participant activities
- Feedback received:
  - Community needs affordable housing
  - Interest in mixed-use housing
  - Need for multi-generational housing and larger housing units
  - Focus on improving historic downtown
  - Access to public amenities (parks, etc.) and walking trails/bike lanes is important

House Our Rialto Webpage

- Webpage providing information on the Housing Element Update and opportunities for the community to participate
  - Email list
  - Self-Guided Workshop
  - Become and “Engagement Partner”
- Contact information



Sites Analysis & Identification

Sites Analysis

- Determine capacity for residential development at different levels of affordability under current regulations
- Accounts for:
  - Projects in the pipeline
  - Vacant parcels zoned for residential
  - Non-vacant parcels zoned for residential
  - Accessory Dwelling Units
  - 5th Cycle sites

Estimated Residential Dwelling Unit Potential

	Low- and Very-Low Income	Moderate- and Above-Moderate Income
Pipeline projects	0	0
Vacant residentially zoned parcels	289	11,789
Non-vacant residential parcels	228	5,265
Accessory Dwelling Units	72	53
TOTAL EXISTING CAPACITY	589	**17,107**
RHNA Allocation	3,415	4,837
Surplus/Shortfall	-2,826	12,270

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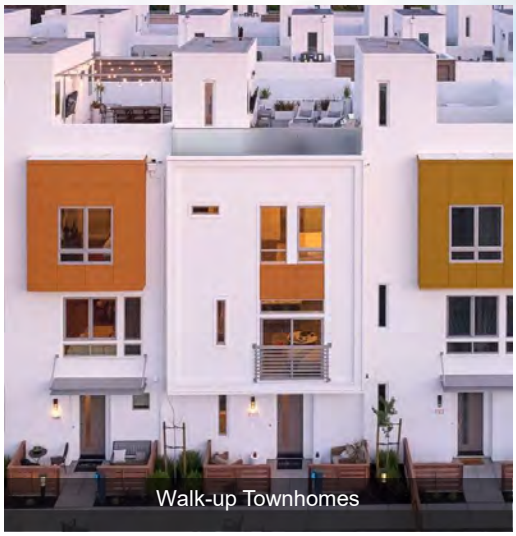
State law requires minimum of 30 dwelling units per acre

City of Rialto – 2021-2029 Housing Element Update

Photo Credit: KTGY Architecture



21 du/ac

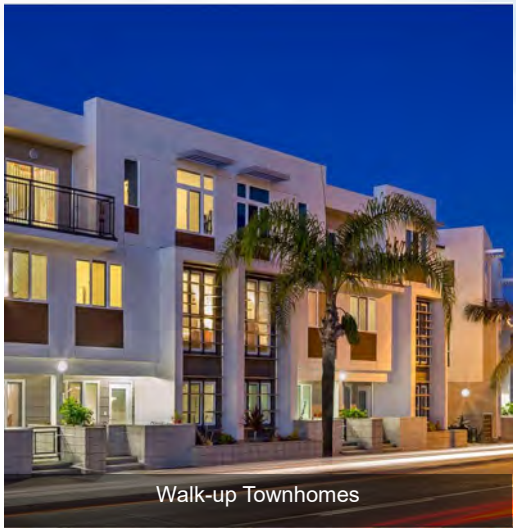
30 du/ac

36 du/ac (Affordable)

Density Examples – 20-35 DU/Acre

City of Rialto – 2021-2029 Housing Element Update

Photo Credit: KTGY Architecture



30 du/ac

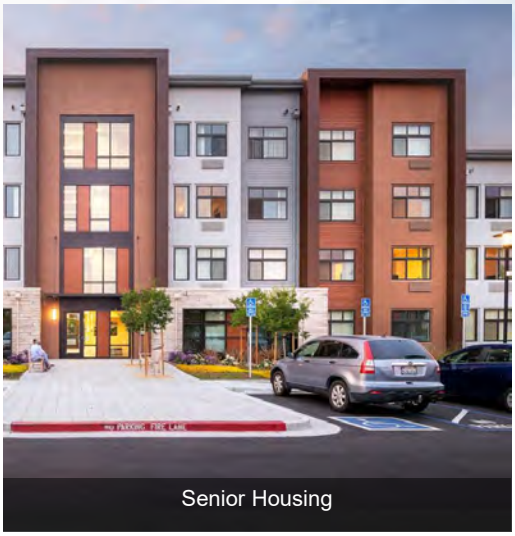
30 du/ac

31 du/ac

Density Examples – 30 DU/Acre

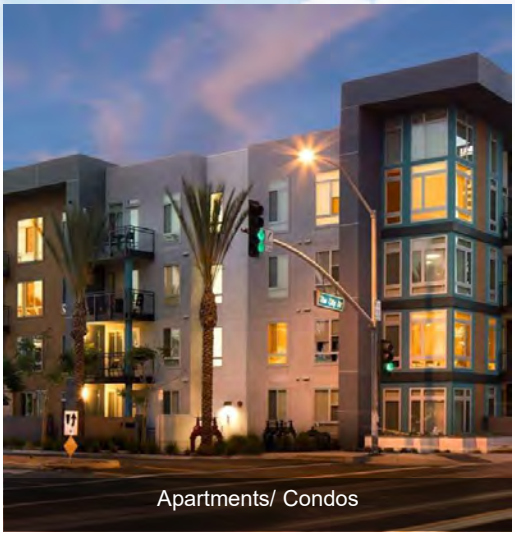
City of Rialto – 2021-2029 Housing Element Update

Photo Credit: KTGY Architecture



21 du/ac

30 du/ac



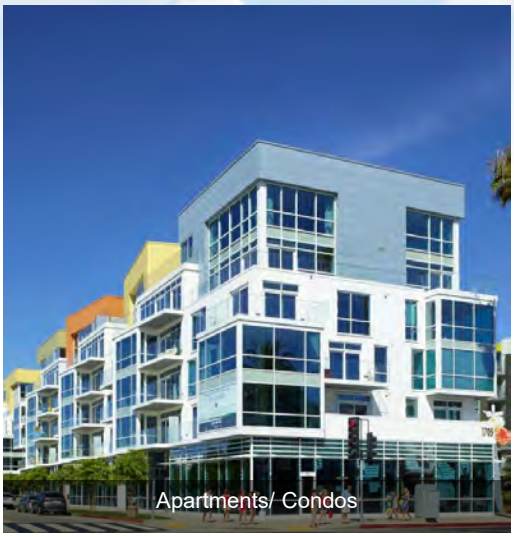
36 du/ac

Density Examples – 21-36 DU/Acre

City of Rialto – 2021-2029 Housing Element Update

Photo Credit: KTGY Architecture

21 du/ac



30 du/ac

36 du/ac

Density Examples – 21-36 DU/Acre

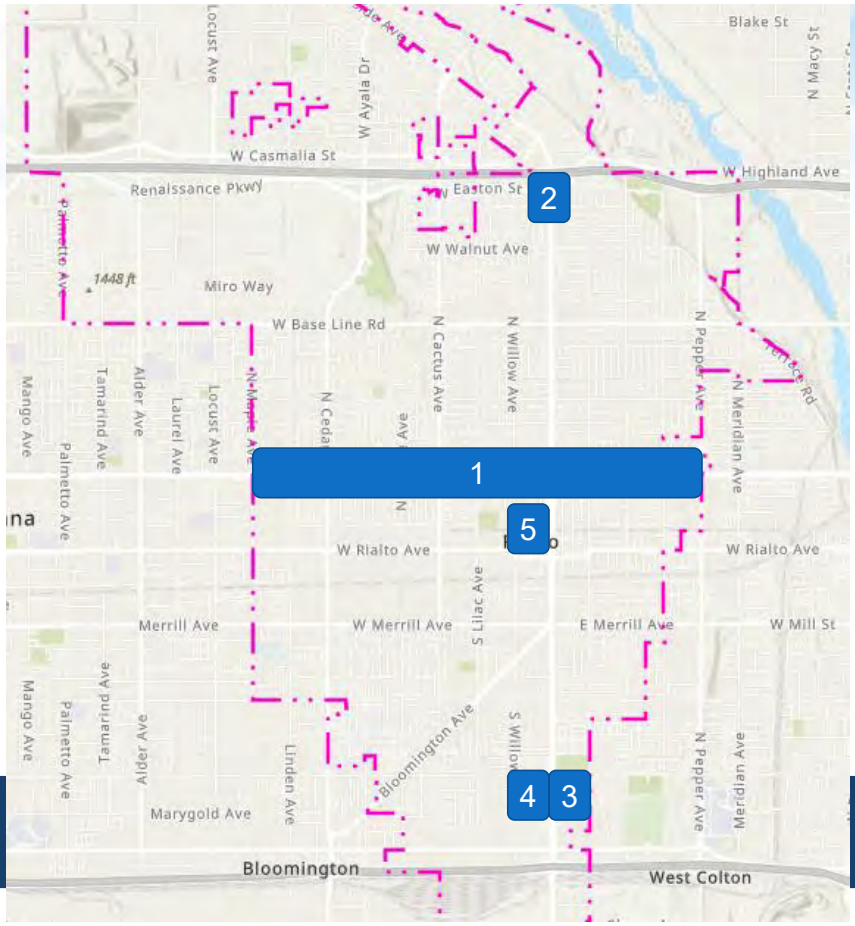
City of Rialto – 2021-2029 Housing Element Update

Sites Identification Process

- Site characteristics:
  - Vacant/underutilized
  - Lot size
  - Proximity to transit
  - Potential to develop at higher density
  - City-owned properties
  - Potential of existing non-residential sites capable to develop for residential use

- Consider the existing use and its realistic likelihood to redevelop for residential uses within the planning period

Opportunity Areas



1 - Foothill Blvd

2 - North Riverside Ave

3 - South Riverside Ave

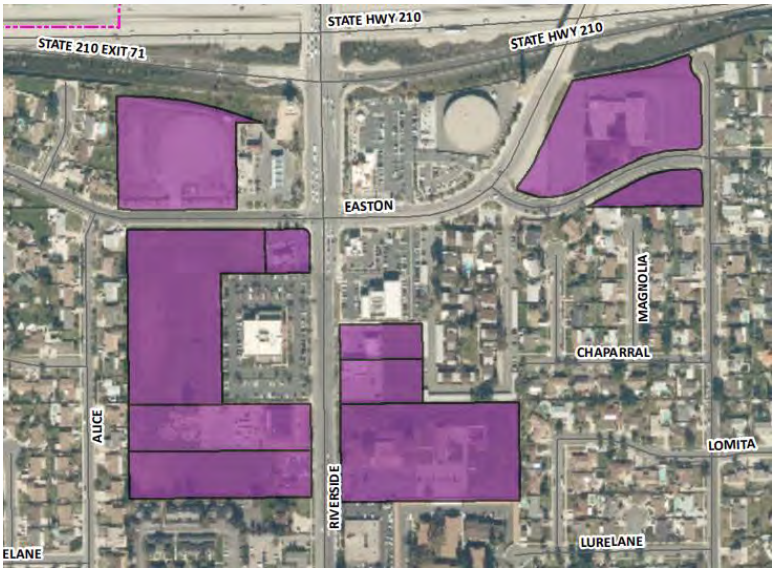
4 - Rialto Marketplace II

5 - Central Area

Opportunity Area 1 – Foothill Boulevard

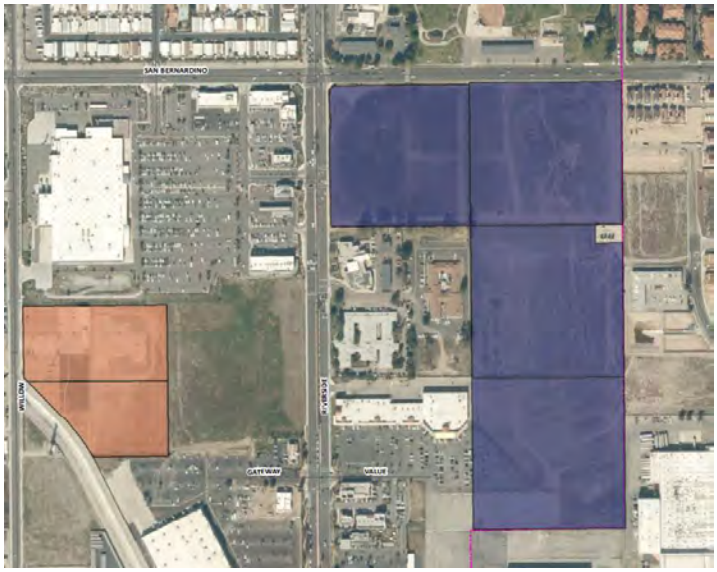
- Foothill Boulevard Specific Plan Amendment
  - Allow 30-dwelling units per acre on projects of all sizes

Opportunity Area 2 – North Riverside Ave



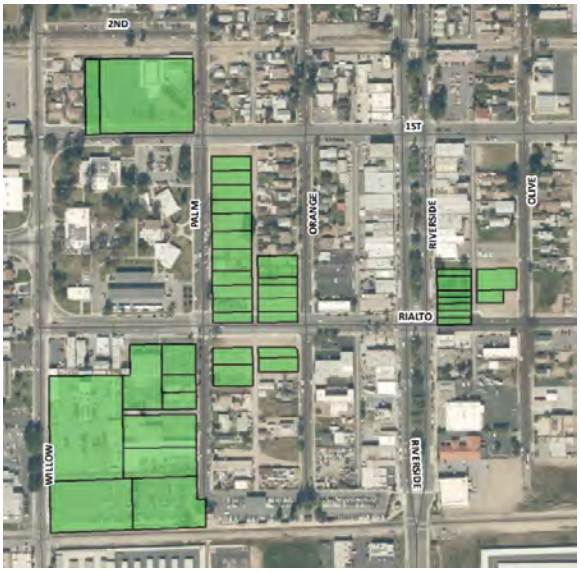
- Zoning Code Amendment
  - C-1 Neighborhood Commercial Zone and A-P Administrative-Professional-Institutional Zone to R-4 High Density Multiple Family Zone

Opportunity Area 3 & 4 – Gateway Specific Plan



- Gateway Specific Plan Amendment
  - Establish a new land use category and development standards for lots currently identified as Retail Commercial, Office Park, and Industrial Park

Opportunity Area 5 – Central Area



- Central Area Specific Plan Amendment
  - Change parcels from Core Commercial, Office Services, Support Facilities, and Cottage Commercial to Increased Density Residential

Key Policy Considerations

- Plan for higher density residential uses in five opportunity areas
- Buffer for No Net Loss provisions in anticipation of project approvals with fewer units than shown in the Housing Element
- Explore additional areas such as Baseline Avenue and Bloomington Avenue

Next Steps

Next Steps

Thank You!

Questions?

Please contact:

Siri Champion, Project Manager

Email: schampion@rialtoca.gov

Phone: (909) 820-8072

For more information, please visit the City's Housing Element Update webpage: www.yourrialto.com/HouseOurRialto

C.4 Planning Commission Study Session

This section contains all materials available for the July 14, 2021, Planning Commission Study Session. A recording of the Study Session is available on the City's website.

City of Rialto

Special Meeting - Final

Planning Commission

Wednesday, July 14, 2021 **5:00 PM** **Council Chambers,150 S. Palm Ave., Rialto, CA 92376**

HOUSING ELEMENT UPDATE STUDY SESSION

Public Participation Procedures

NOTICE IS GIVEN THAT THE CITY COUNCIL OF THE CITY OF RIALTO HAS DECLARED A LOCAL EMERGENCY RELATED TO COVID-19, AND IN COMPLIANCE WITH SOCIAL DISTANCING PROTOCOLS REQUIRED BY GOVERNOR NEWSOM'S EXECUTIVE ORDER N-29-20 AND THE STATE DEPARTMENT OF PUBLIC HEALTH, THE COUNCIL CHAMBERS WILL BE OPEN TO THE PUBLIC WITH LIMITED SEATING INSIDE. THE PUBLIC WILL HAVE AN OPPORTUNITY TO SPEAK USING THE PODIUM INSIDE THE COUNCIL CHAMBERS.

IF YOU ARE UNABLE TO ATTEND THE MEETING, YOU MAY SUBMIT COMMENTS BEFORE THE MEETING TIME, AS FOLLOWS:

- IN WRITING VIA MAIL TO: CITY OF RIALTO "ATTN: PLANNING COMMISSION, C/O COMMUNITY DEVELOPMENT," 150 S PALM AVE, RIALTO, CA 92376; OR
- BY EMAIL TO PLANNING@RIALTOCA.GOV.

Call To Order

Pledge of Allegiance

Roll Call

Chair Frank Gonzalez, Vice-Chair Jerry Gutierrez, John Peukert, Artist Gilbert, Al Twine, Dale Estvander, BarBara Chavez

Study Session

PC-21-0437 Plan to House Our Rialto: 2021-2029 Housing Element Update Study Session

Adjournment

City of Rialto

Legislation Text

File #: PC-21-0437, **Version:** 1, **Agenda #:**

For Planning Commission Study Session [July 14, 2021]

TO: Honorable Chairman and Planning Commissioners

APPROVAL: Karen Peterson, Community Development Manager

FROM: Siri Champion, Senior Planner

Plan to House Our Rialto: 2021-2029 Housing Element Update Study Session

BACKGROUND

The intent of this study session is to provide background information, give an update on community engagement, and obtain policy direction regarding the City's approach to meeting the City's 2021-2029 RHNA allocation.

HOUSING ELEMENT REQUIREMENT

In compliance with State law and in support of housing production, jurisdictions, including the City of Rialto, are required to include a Housing Element in the General Plan. The purpose of the Housing Element Update is to adequately plan to meet anticipated housing needs of all incomes. As a policy plan, the Housing Element neither requires nor authorizes any housing units to be built. Instead, it identifies opportunities for for-profit and not-for-profit residential developers.

CERTIFICATION BY HOUSING AND COMMUNTIY DEVELOPMENT (HCD)

As part of the update process, the Housing Element is submitted to the California State Department of Housing and Community Development (HCD) for review and determination of compliance. By statute Housing Elements are required to be updated on a regular cycle. At this time, Rialto's Housing Element must be updated every four years. Provided that the City adopts the 6th Cycle Housing Element Update by October 15, 2021, the City may return to an eight-year schedule. The adoption process includes at least one Public Hearing by the Planning Commission and one public hearing by the City Council.

REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)

The Plan to House Our Rialto will comply with State law and include goals, policies, objectives, and programs to preserve, improve, and promote the production of housing for all income levels. The plan will also address the City's share of the Regional Housing Needs Assessment (RHNA) and demonstrate how it can be accommodated. Overall, the Southern California Association of Governments (SCAG) region must accommodate 1,341,827 total units, which have been allocated by SCAG to all the jurisdictions in the region. Rialto's share is 8,252 dwelling units, which is more than three times the City's 5th Cycle allocation of 2,715.

RHNA allocations are broken into income categories as shown in Table 1.

Table 1. 2021-2029 (6th Cycle) Regional Housing Needs Assessment Allocation by Income Level* for City of Rialto				
Very-low income $37,650	Low income $60,250	Moderate Income $75,300	Above-moderate $90,350	Total
2,212	1,203	1,368	3,469	8,252
* 2020 State Income Limits for 4-person households in San Bernardino County				

COMMUNITY ENGAGEMENT AND CONTEXT

Public engagement is an important source of information to understand local housing conditions and potential approaches to meeting housing need. The engagement process initiated in March with the virtual Phase 1 Community Workshop

Major themes from the workshop include:

- Need for affordable housing
- Need for diverse housing options such as
    - Multi-generational housing
    - Large homes
    - Mixed use housing in commercial areas for young people
    - Homes for seniors and those who are disabled
- Visions of neighborhoods that are safe, equitable, revitalized, and with access to public amenities, transit, walking trails, and bike lanes
- A desire for programs to rehabilitate older homes and revitalize older areas such as the historic downtown

Other comments include a desire for environmentally friendly housing and good air quality as well as concerns about equity for BIPOC (black, indigenous, people of color) and transgender people when seeking a home.

ANALYSIS/DISCUSSION

The Plan to House Our Rialto team has completed a preliminary sites analysis following HCD's Site Inventory Guidebook. The results of the analysis are provided in this section. In short, the City has sufficient land zoned for residential to satisfy the RHNA allocation for moderate and above-moderate income dwelling units. However, the City does not have enough land zoned for residential to satisfy the RHNA allocation for the low- and very-low income categories.

Through this item, the project team seeks direction regarding where to accommodate residential uses at higher densities as required by HCD to accommodate low and very low income.

SITES ANALYSIS

To plan for the needs of current and future residents as anticipated by the City's RHNA, the Plan to House Our Rialto team has conducted a citywide analysis of sites for potential residential development. That analysis took into consideration state requirements for sites by income ranges. As shown in Table 2, the City has ample existing sites, meaning parcels already zoned appropriately, to meet and exceed the RHNA allocation for moderate income and above-moderate income dwelling units.

Table 2. Estimated Residential Dwelling Unit Potential *Moderate Income and Abov*	
Vacant residentially zoned parcels	11,789
Non-vacant residential parcels with propens	5,265
Accessory Dwelling Units	53
Total	17,107
Allocation	4,837
Sites Surplus	12,270

However, the City does not have sufficient sites to meet state requirements for low income categories. The state requires that sites be zoned for residential at a minimum of 30 dwelling units per acre to accommodate the development of housing affordable to lower-income households. While height, bulk, and aesthetic character can vary significantly, a few examples in the 30-35 dwelling unit per acre range appear below.
As shown in Table 3, Rialto's existing residential dwelling unit potential in the very-low and low-income categories has a shortfall of 2,826 dwelling units.

Table 3. Estimated Residential Dwelling Unit Potential *Very-Low and Low Income*	
Vacant residentially zoned parcels	289
Non-vacant residential parcels with propens	228
Accessory Dwelling Units	72
Total	589
Allocation	3,415
Dwelling Unit Shortfall	-2,826

OPPORTUNITY AREAS
To make up the 2,836 dwelling unit shortfall, the City must identify opportunities to upzone and/or rezone parcels. By upzoning, the City may increase the allowed density to 30 dwelling units per acre or more. By rezoning, the City may change a non-residential parcel to a residential parcel. For example, commercially zoned parcels may be changed to create opportunities for multiple family residential development.

To identify potential opportunities, the Plan to House Our Rialto team conducted a citywide analysis of parcel characteristics including existing zoning, existing use (vacant/underutilized), lot size, proximity to transit, and surrounding development patterns. As a result of that analysis, five opportunity areas have been identified for further consideration. The five opportunity areas are listed in Table 4.

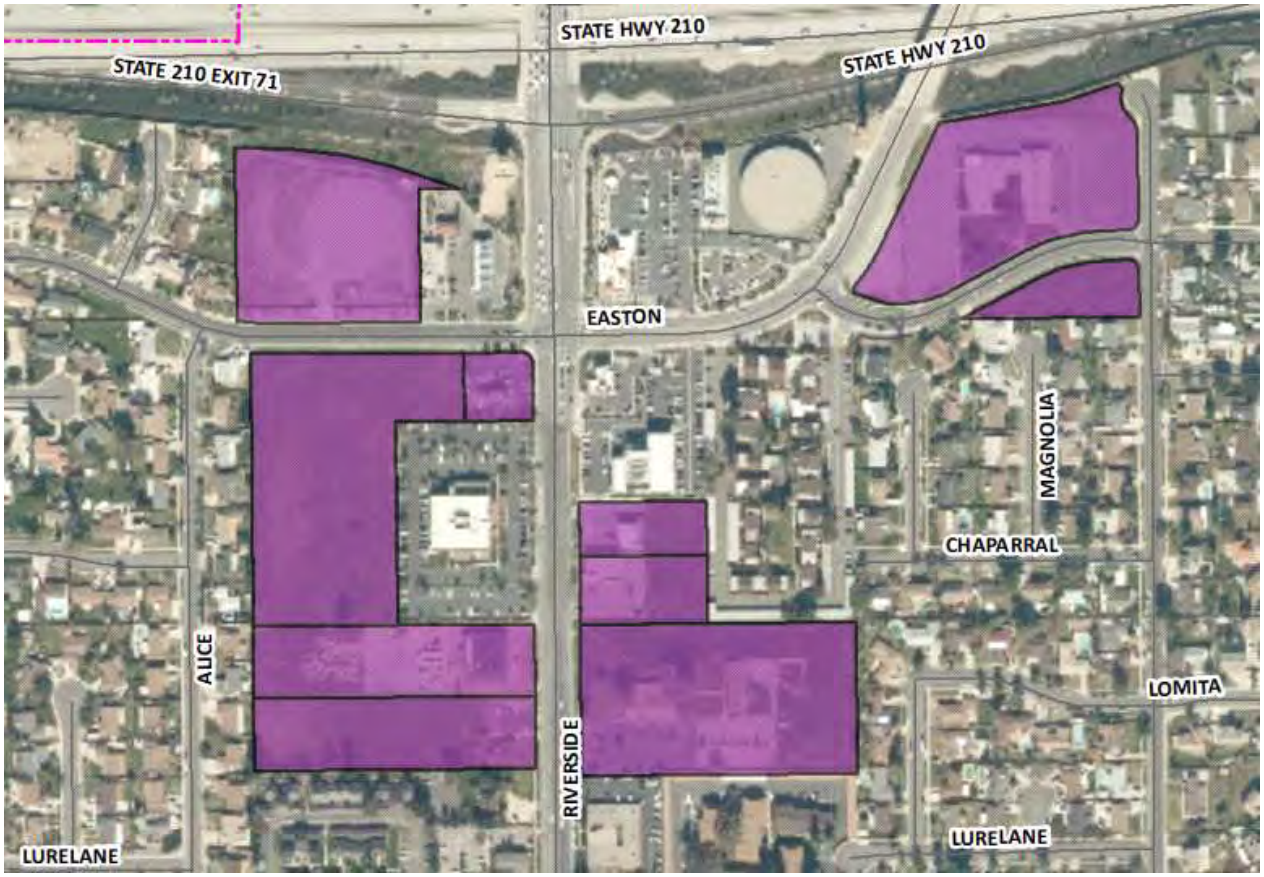
Table 4. Estimated Dwelling Unit Potential in Opportunity Areas Under Considerat	
1 - Foothill Boulevard	1,470
2 - North Riverside Avenue near 210 Freew	678

3 - South Riverside Avenue (southeast of S Riverside Avenue)	570
4 - Rialto Marketplace II	251
5 - Central Area Specific Plan	184
Total	3,153

For each of the five opportunity areas, the City would need to implement Specific Plan or zoning code amendments. Those implementation activities are summarized as follows.

Opportunity Area 1 would require an amendment to the Foothill Boulevard Specific Plan. Currently, residential development is allowed in all land use districts. However, the allowed density varies with the project size. Currently, on projects over 3 acres, 30 dwelling units per acre are allowed. To meet state requirements and achieve more low- and very-low income dwelling units, the City would need to increase residential density for project sizes less than 3 acres.

Opportunity Area 2 - North Riverside Avenue



Opportunity Area 2 would require a change of zoning from C-1 Neighborhood Commercial Zone and A-P Administrative-Professional-Institutional Zone to R-4 High Density Multiple Family Zone.

Opportunity Area 3 and 4 - South Riverside Avenue and Rialto Marketplace II

Opportunity Area 3 and 4 would require an update to the Gateway Specific Plan. Opportunity Area 3 is in the vicinity of the Grace Vargas Senior Center and Rialto Assisted Living and Opportunity Area 4 is a portion of the Rialto Marketplace II development. Currently, the opportunity areas are identified as Retail Commercial (R-C), Office Park (O-P), and Industrial Park (I-P). Through a Specific Plan Amendment, the City would establish a new land use category and accompanying development standards.

Opportunity Area 5 - Central Area

Opportunity Area 5 would require an amendment to the Central Area Specific Plan to change several parcels from Core Commercial, Office Services, Support Facilities, and Cottage Commercial to Increased Density Residential.

NO NET LOSS

The City should consider identifying an excess of opportunity sites due to SB 166, which requires no net loss. SB 166 is intended to ensure development opportunities remain available throughout the planning period to accommodate a jurisdiction's RHNA. As a result of SB 166, if the City approves development of a parcel identified in the Housing Element sites inventory with fewer units than shown in the Housing Element, it must either make findings that the Housing Element's remaining sites have

sufficient capacity to accommodate the remaining unmet RHNA by income level or identify and make available sufficient sites to accommodate the remaining unmet RHNA for each income category.

NEXT STEPS

The next steps in the development of the Plan to House Our Rialto includes continued analysis of opportunity sites and public engagement. During July, the Plan to House Our Rialto team will complete the site inventory and identification and draft the Housing Plan. The draft plan will be available for review during the month of August. A Public Hearing on the draft is planned for the Planning Commission September and a Public Hearing on the draft plan is planned for the City Council on October 12.

Phase 2 Community Survey and Interactive Mapping

The Phase 2 Community Survey opened on June 14 and is currently live. The survey includes questions about housing type, location, and policy priorities.

As requested by City Council and public stakeholders, the Plan to House Our Rialto team is preparing an interactive map to illustrate candidate sites and receive comments from the public.

Phase 3 Community Workshop

The Phase 3 Community Workshop is scheduled for July 15, 2021. The meeting will include a report on public input to date, an introduction to the Plan to House Our Rialto, and a demonstration of the interactive map.

GENERAL PLAN CONSISTENCY

The Housing Element and its implementation plan are a required component of the General Plan. This activity is consistent with Goal 6-2, which is to “promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.”

RECOMMENDATION

Staff recommends that the Planning Commission receive and file this report and provide direction to staff regarding the five opportunity areas which may be used to meet the state’s RHNA allocation for low-income categories.

Plan to House Our Rialto:

2021-2029 Housing Element Update

City Council Study Session – June 23, 2021

Agenda

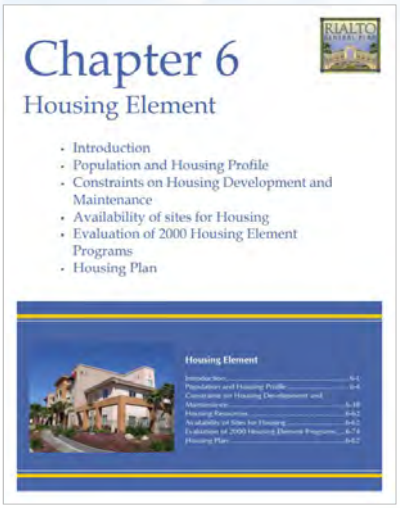
- Background
  - Housing Element Background
  - Community Engagement
- Sites Analysis
- Next Steps

Background

Housing Element Background

- Required element of the City's General Plan
- Requires adoption by the State Department of Housing and Community Development (HCD)
- Updated on 8-year cycles
- Requires a General Plan Amendment and at least one public hearing by Planning Commission and City Council

- Statutory Deadline: October 15, 2021
  - 120-day grace period beyond October 15


Chapter 6
Housing Element

- Introduction
- Population and Housing Profile
- Constraints on Housing Development and Maintenance
- Availability of sites for Housing
- Evaluation of 2000 Housing Element Programs
- Housing Plan

New Legislation for Housing Elements

- **Funding Measures**:
  - SB 2
  - SB 3
- **Streamlining Measures**:
  - SB 35
  - SB 540
  - AB 73
  - AB 2753
  - SB 765
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  - Virtual community workshop on May 19th, 2021
  - Self-Guided Workshop - in person and online
  - Informational postcards sent to the community
  - Community surveys – in person and online
    - In progress
- Spanish translations provided
- Online advertising on social media and the City's website

PLAN DE VIVIENDAS EN NUESTRO RIALTO

6º Ciclo de la Actualización del Elemento de Vivienda de la Ciudad de Rialto

La ciudad está actualizando el Elemento de Vivienda para los años 2021-2029.

¡Trabajemos juntos para hacerlo Nuestro Plan!

El Elemento de Vivienda es el plan de la ciudad para adaptarse a las necesidades de vivienda de los residentes actuales y futuros de todos los niveles de ingreso en Rialto.

- Embarcarse en una serie de oportunidades de participación para escuchar su opinión,
- Revisar las normas y programas de vivienda actuales de la ciudad
- Analizar las condiciones de vivienda existentes y terrenos que se puedan adaptar para nuevas viviendas, y
- Actualizar el plan de vivienda de la ciudad para reflejar las necesidades de Rialto y crear oportunidades para el desarrollo residencial privado

¿Cuáles son las fechas para participar? Vea los horarios a continuación:

abril-mayo	Taller Comunitario #1 - mayo 19 - junio 6
mayo-julio	Mapa interactivo y encuesta en línea - junio 14-27
julio-agosto	Taller Comunitario #2 - julio 15 - 30
agosto-octubre	Revisión Pública del Documento para Comentarios - sep. 2021

Para obtener más información y registrarse para recibir mensajes por correo electrónico, visite el sitio web de la ciudad: www.yourrialto.com/HouseOurRialto

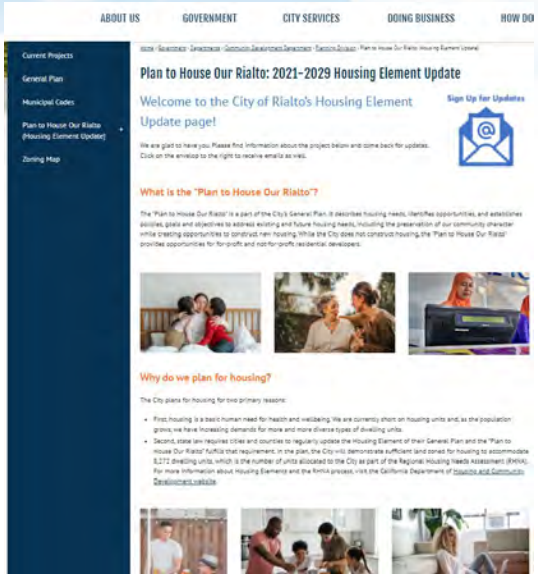
¡La ciudad necesita sus ideas y aportes!

Virtual Community Workshop

- Date: May 19, 2021
- Spanish translation available
- Overview:
  - Housing Element Update Process
  - Baseline demographics and housing data
  - Participant activities
- Feedback received:
  - Community needs affordable housing
  - Interest in mixed-use housing
  - Need for multi-generational housing and larger housing units
  - Focus on improving historic downtown
  - Access to public amenities (parks, etc.) and walking trails/bike lanes is important

House Our Rialto Webpage

- Webpage providing information on the Housing Element Update and opportunities for the community to participate
  - Email list
  - Self-Guided Workshop
  - Become and "Engagement Partner"
- Contact information



Sites Analysis & Identification

Sites Analysis

- Determine capacity for residential development at different levels of affordability under current regulations
- Accounts for:
  - Projects in the pipeline
  - Vacant parcels zoned for residential
  - Non-vacant parcels zoned for residential
  - Accessory Dwelling Units
  - 5th Cycle sites

Estimated Residential Dwelling Unit Potential

	Low- and Very-Low Income	Moderate- and Above-Moderate Income
Pipeline projects	0	0
Vacant residentially zoned parcels	289	11,789
Non-vacant residential parcels	228	5,265
Accessory Dwelling Units	72	53
TOTAL EXISTING CAPACITY	589	**17,107**
RHNA Allocation	3,415	4,837
Surplus/Shortfall	-2,826	12,270

Estimated Residential Dwelling Unit Potential

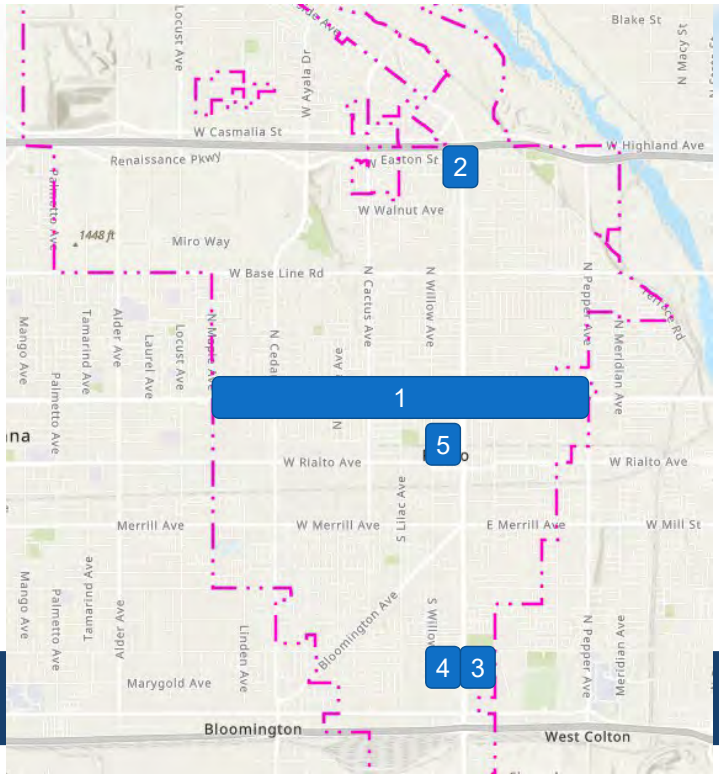
	Low- and Very-Low Income
Pipeline projects	0
Vacant residentially zoned parcels	289
Non-vacant residential parcels	228
Accessory Dwelling Units	72
TOTAL EXISTING CAPACITY	589
RHNA Allocation	3,415
Surplus/Shortfall	-2,826

State law requires minimum of 30 dwelling units per acre

Sites Identification Process

- Site characteristics:
  - Vacant/underutilized
  - Lot size
  - Proximity to transit
  - Potential to develop at higher density
  - City-owned properties
  - Potential of existing non-residential sites capable to develop for residential use
- Consider the existing use and its realistic likelihood to redevelop for residential uses within the planning period

Opportunity Areas



1 - Foothill Blvd

2 - North Riverside Ave

3 - South Riverside Ave

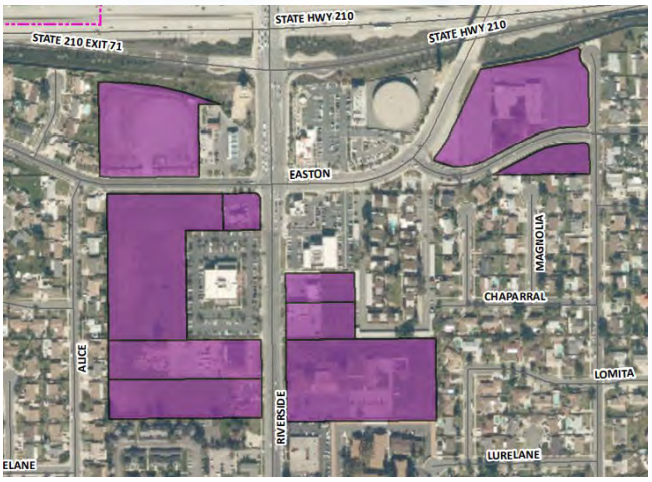
4 - Rialto Marketplace II

5 - Central Area

Opportunity Area 1 – Foothill Boulevard

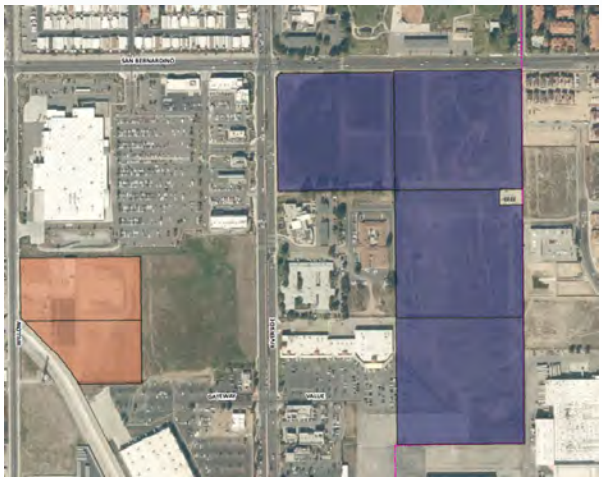
- Foothill Boulevard Specific Plan Amendment
  - Allow 30-dwelling units per acre on projects of all sizes

Opportunity Area 2 – North Riverside Ave



- Zoning Code Amendment
  - C-1 Neighborhood Commercial Zone and A-P Administrative-Professional-Institutional Zone to R-4 High Density Multiple Family Zone

Opportunity Area 3 & 4 – Gateway Specific Plan



- Gateway Specific Plan Amendment
  - Establish a new land use category and development standards for lots currently identified as Retail Commercial, Office Park, and Industrial Park

Opportunity Area 5 – Central Area

- Central Area Specific Plan Amendment
  - Change parcels from Core Commercial, Office Services, Support Facilities, and Cottage Commercial to Increased Density Residential

Key Policy Considerations

- Plan for higher density residential uses in five opportunity areas
- Buffer for No Net Loss provisions in anticipation of project approvals with fewer units than shown in the Housing Element
- Explore additional areas such as Baseline Avenue and Bloomington Avenue

Next Steps

Next Steps

Thank You!

Questions?

Please contact:
Siri Champion, Project Manager
Email: schampion@rialtoca.gov
Phone: (909) 820-8072

For more information, please visit the City's Housing Element Update webpage: www.yourrialto.com/HouseOurRialto

C.5 Community Workshop #2

This section contains all available materials created for the virtual community workshop and following in-person outreach. Public comments for the workshop were received verbally and through the Zoom chat function. The recorded workshop is available for viewing on the Housing Element Update webpage:https://www.rialtoca.gov/633/Plan-to-House-Our-Rialto-Housing-Element.

PLAN TO HOUSE OUR RIALTO

City of Rialto 2021-2029 Housing Element Update

Community Workshop #2

The City of Rialto is preparing to release the draft "Plan to House Our Rialto: 2021-2029 Housing Element Update." The plan will guide decisions about and create opportunities for developers to build new housing. Please join us for virtual a workshop to learn about the different parts of the plan and provide feedback.

WHEN: July 15, 2021, 6-8 p.m.

WHERE: Online via Zoom at: https://bit.ly/3An3yCK

WEBSITE: www.yourrialto.com/HouseOurRialto

Upcoming Public Meetings

City Council Meeting - July 13, 2021, at 6:30 p.m.

Planning Commission Study Session - July 14, 2021, at 5:00 p.m.

For questions, please contact Siri Champion, Project Planner by email at schampion@rialtoca.org

PLAN DE VIVIENDAS EN NUESTRO RIALTO

ACTUALIZACIÓN DEL ELEMENTO DE VIVIENDA DE LA CIUDAD DE RIALTO 2021-2029

Taller Comunitario #2

La ciudad de Rialto se está preparando para publicar el borrador del "Plan de Viviendas en Nuestro Rialto." El plan guiará y creará oportunidades para que los desarrolladores inmobiliarios construyan nuevas viviendas. Únase a nosotros en un taller virtual para aprender sobre las diferentes partes del borrador y cómo puede proporcionar comentarios durante el período de revisión pública.

FECHA Y HORA: 15 de julio del 2021, 6-8 p.m.

LUGAR: Reunión en línea: https://kimley-horn.zoom.us/j/98352198501

SITIO WEB: www.yourrialto.com/HouseOurRialto

Próxima Reunión Pública

Reunión del Concejo de la Ciudad - 13 de julio del 2021, 6:30 p.m.

Sesión de Estudio de la Comisión de Planificación - 14 de julio del 2021, 5:00 p.m.

Si tiene alguna pregunta, por favor comuníquese con Siri Champion, Planificadora del Proyecto por correo electrónico a schampion@rialtoca.org

C.6 Interactive Feedback Map

This section contains all available data and information collected through the interactive map.

Rialto Housing Element Update Survey Map-Copy

Housing Recommendations

- Good location for additional housing
- Location not well suited for additional housing
- Comment

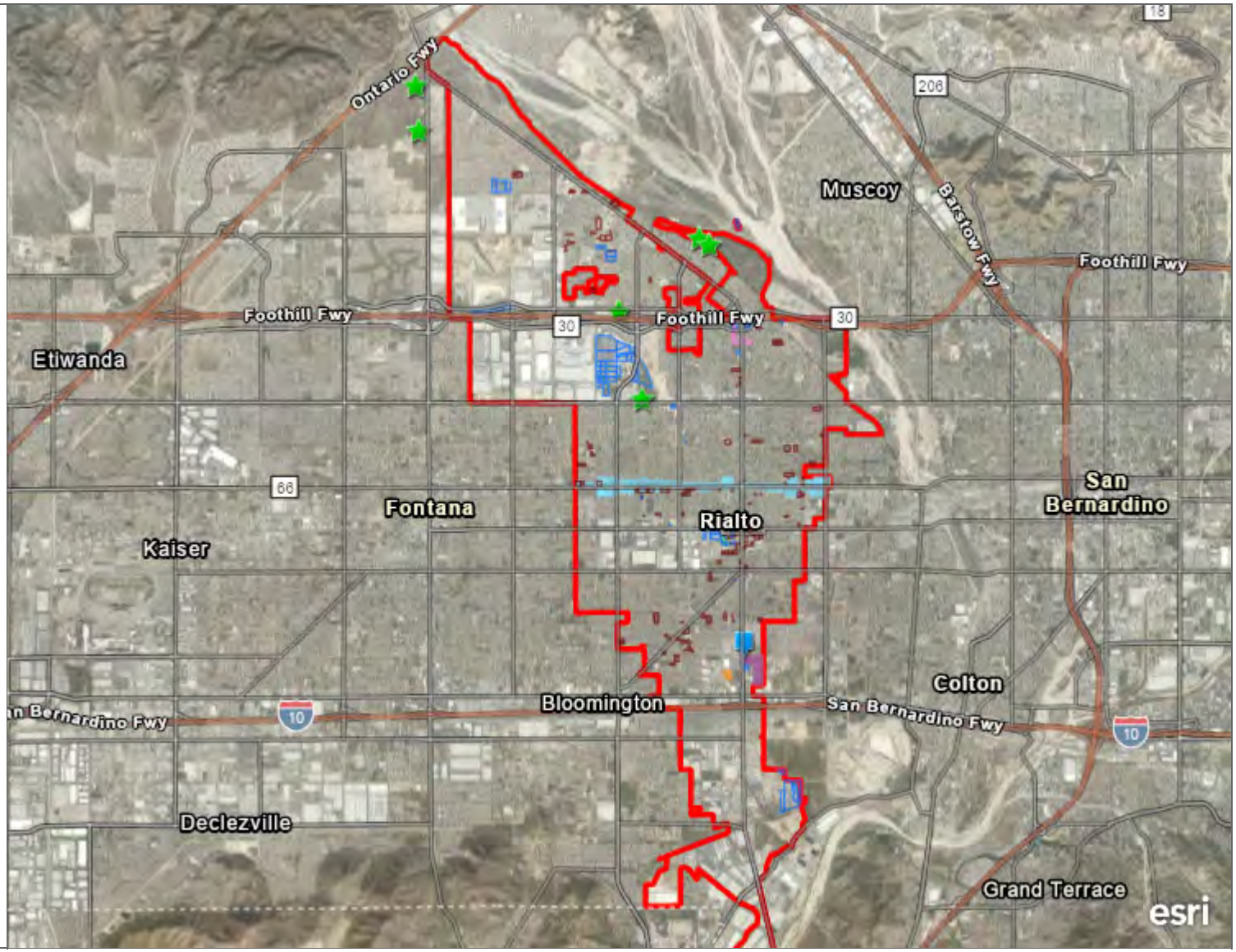
City-Owned Sites

5th Cycle Sites

Opportunity Areas

- 1 - Foothill Blvd.
- 2 - North Riverside Ave.
- 3 - South Riverside Ave.
- 4 - Rialto Marketplace II
- 5 - Central Ave.

City of Rialto



This interactive map gathers public feedback on the potential location of future housing in Rialto, as well as related information.

San Bernardino County, Earthstar Geographics | Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Rialto Housing Element Update Survey Map-Copy

Housing Recommendations

- Good location for additional housing
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City-Owned Sites

5th Cycle Sites

Opportunity Areas

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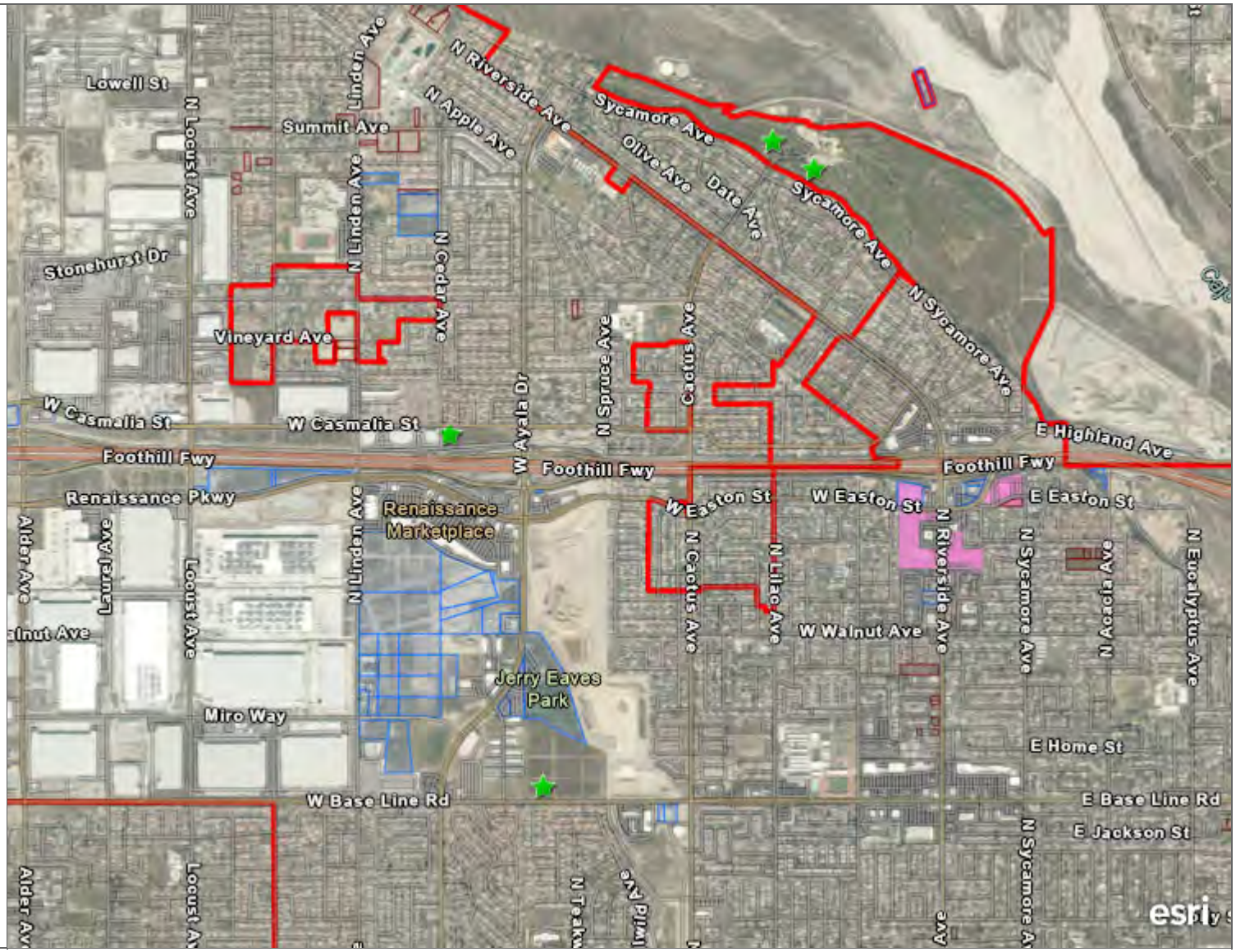
City of Rialto



This interactive map gathers public feedback on the potential location of future housing in Rialto, as well as related information.

San Bernardino County, Maxar | Esri Community Maps Contributors, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

Home Gallery Map Scene Groups Content Organization

Recommended Housing Locations

Overview Data Visualization Usage Settings

Table Fields

Double-click a value in the table to change it.

Data Last Updated: Jul 21, 2021, 10:11:09 PM

Point layer (Features: 7, Selected: 0)

Photos and Files

Comments	Photos and Files
This corner lot would be great for multi-use housing	(0) Add
The old golf course would be a great place to put a senior housing community (with amenities). I am tired of seeing neighbors move to Beaumont because we don't have any senior community (housing) locally.	(1) Show
The old golf course would be a great place to put a senior housing community (with amenities).	(0) Add
townhomes (moderate income)	(0) Add
moderate to low income townhomes, homes, or apartments	(0) Add
low to moderate income homes, townhomes, or apartments	(0) Add
low income or transitional housing	(0) Add

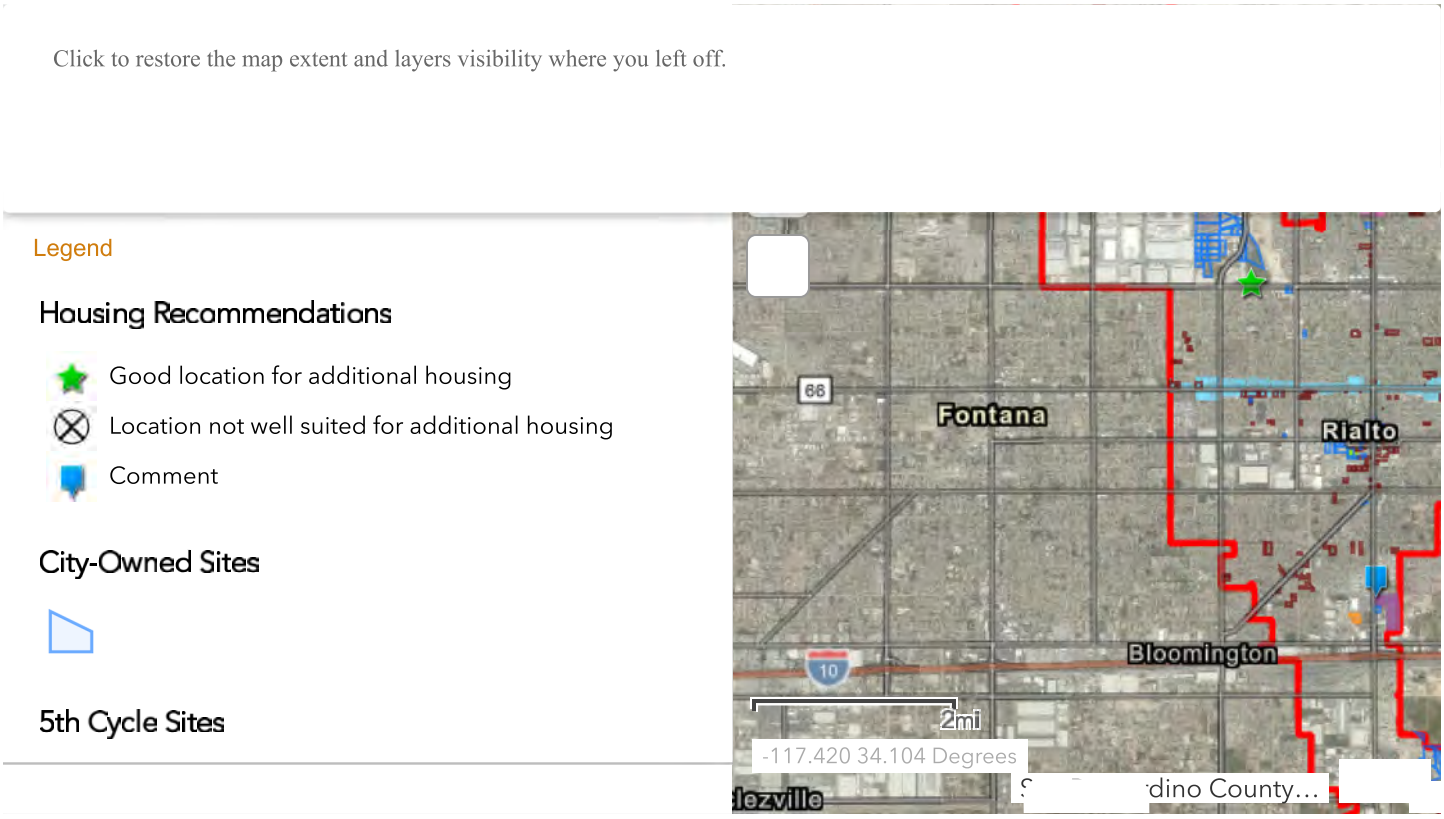
Plan to House Our Rialto

The City is updating its Housing Element for 2021-2029 and is requesting community input.

City of Rialto - Planning Division
June 9, 2021

The Housing Element is a required chapter of the City's General Plan. It guides future housing growth at all income levels in the City and addresses housing needs of current and future residents. The City will not be building housing, but it will create policies and programs that promote and facilitate the development of housing to meet the needs of the community. If you would like to learn more please visit: www.yourrialto.com/HouseOurRialto.

The following map will ask for your input on potential locations for future housing development. and policies/programs. Your responses will help us in identifying opportunity areas that could accommodate future housing growth in Rialto, as well as help us create policies and programs to meet the needs of all economic segments of the community. Your input is very important to us - all your information will be kept private.



ArcGIS Web Application

Thank you for taking the time to provide input into this important update process. Please help us get the word out by sharing this site with your family, friends, neighbors, and colleagues.

If you have any questions or comments about the survey, the map, or the Plan to House Our Rialto please contact: Siri Champion (Project Manager) by email at schampion@rialtoca.gov or by phone at 909-421-8072.

C.7 Spanish-Speaking Workshop

This section contains all available materials created for the in-person community workshop. The workshop was held solely in Spanish and presented the same information as the workshop on July 15, 2021.

Plan de Vivienda de Nuestro Rialto:

Actualización del Elemento de Vivienda 2021-2029

Taller Comunitario Virtual #2 – 15 de julio de 2021

1

Agenda de Esta Noche

- Antecedentes del Elemento de Vivienda
- Esfuerzos de Participación Comunitaria Hasta la Fecha
- Análisis del Inventario de Sitios y Estrategia Potencial
- Comentarios de la Comunidad
- Borrador de Políticas y Programas
- Próximos Pasos

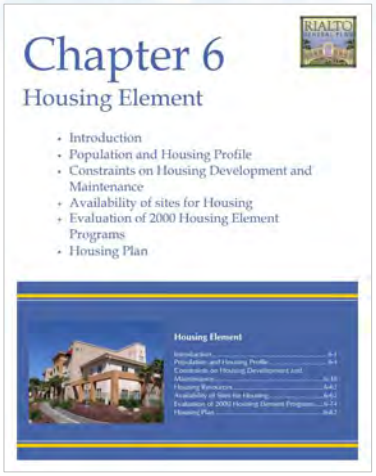
2

Antecedentes del Elemento de Vivienda

3

Antecedentes del Elemento de Vivienda

- Es un Elemento Requerido por El Plan General de la Ciudad
- Requiere la adopción por parte del Departamento de Vivienda y Desarrollo Comunitario del Estado (HCD por sus siglas en inglés)
- Periodo de planificación de 8 años
- Requiere una Enmienda al Plan General y al menos una audiencia pública por parte de la Comisión de Planificación y el Concejo Municipal



4

Componentes del Elemento de la Vivienda

- Perfil de población y vivienda
- Restricciones y recursos de vivienda
- Evaluación de programas y políticas actuales
- Análisis e identificación de sitios para acomodar la distribución de RHNA de la ciudad
- Políticas, programas y objetivos para lograr las metas de vivienda identificadas por la ciudad

5

Distribución 2021-2029 de RHNA para Rialto

Categoría de Ingresos	% del Ingreso Medio del Área (AMI)	Escala de Ingresos[1]		Distribución de RHNA (Unidades Habitacionales)
		Mínimo	Máximo	
Ingresos Muy Bajos	0 - 50% AMI	--	$38,750	2,218 unidades
Ingresos Bajos	51 – 80% AMI	$38,751	$62,000	1,206 unidades
Ingresos Moderados	81 – 120% AMI	$62,001	$93,000	1,371 unidades
Ingresos Superiores a Ingresos Moderados	>120% AMI	$93,001	--	3,477 unidades
			TOTAL:	8,272 unidades

1. La escala de ingresos se basa en el Ingreso Medio del Área (AMI) del HUD de 2021 para el Condado de San Bernardino de $77,500 considerando una familia de 4.

6

Promoción Afirmativa de la Vivienda Justa (AFFH)

- Distribución justa y equitativa de la vivienda en toda la comunidad
- Promueve las comunidades inclusivas
- Aborda los patrones de segregación
- Consideraciones :
  - Una variedad de tipos de vivienda (casas unifamiliares, apartamentos, casas adosadas, etc.)
  - Combinación de niveles de asequibilidad
  - Acceso al transporte Público y al empleo
- Considera el acceso al Transporte Público y a los recursos comunitarios

7

Esfuerzos de Participación Comunitaria hasta la Fecha

8

Actividades de Participación– Taller Fase 1

Taller Comunitario de mayo 19
36 participantes

Taller Autoguiado en Línea
3 participantes

Taller Autoguiado en Persona
5 participantes

City of Rialto – 2021-2029 Housing Element Update

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Actividades de Participación– Encuesta Comunitaria Fase 2

Junio 23 Farmers Market
12 participantes

Encuesta en Línea
55 participantes

Julio 9 Pop It Up BBQ
26 participantes

City of Rialto – 2021-2029 Housing Element Update

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Actividades de Participación – Divulgación y Publicidad

- Sitio Web del Proyecto
- Correo Electrónico (128 contactos)
- 20 Socios Participantes
- Postales/volantes informativos enviados por correo a casi 20,000 personas
- Residentes en vecindarios de ingresos bajos e ingresos moderados
  - Solicitantes de financiamiento CARES
- Publicidad en línea en las redes sociales y en el sitio web de la ciudad

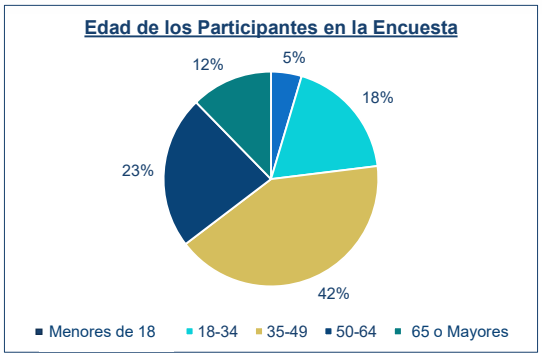
Taller Comunitario Virtual

- Comentarios Recibidos:
  - *La comunidad necesita viviendas asequibles*
  - *Interés por la vivienda de uso mixto*
  - *Necesidad de viviendas multigeneracionales y unidades de vivienda más grandes*
  - *Enfocarse en mejorar el centro histórico*
  - *Es importante el acceso a servicios públicos (parques, etc.) y senderos para caminar / carriles para bicicletas*

Encuesta Comunitaria de Fase 2

Participantes de la Encuesta

- El 83% vive en Rialto
- El 44% trabaja en Rialto
- El 28% son arrendatarios
- El 66% son propietarios



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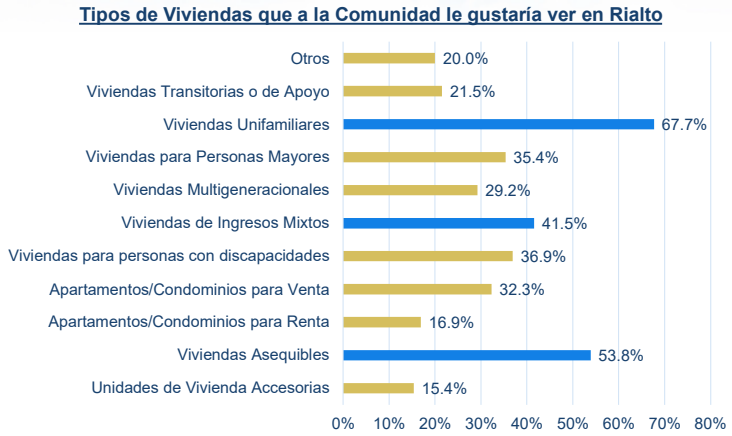
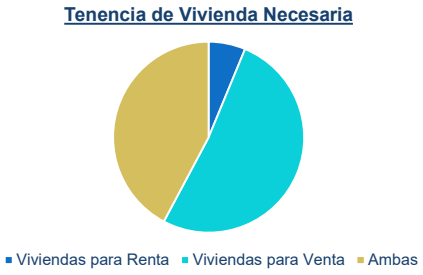
Respuestas a la Encuesta – Tipos de Vivienda





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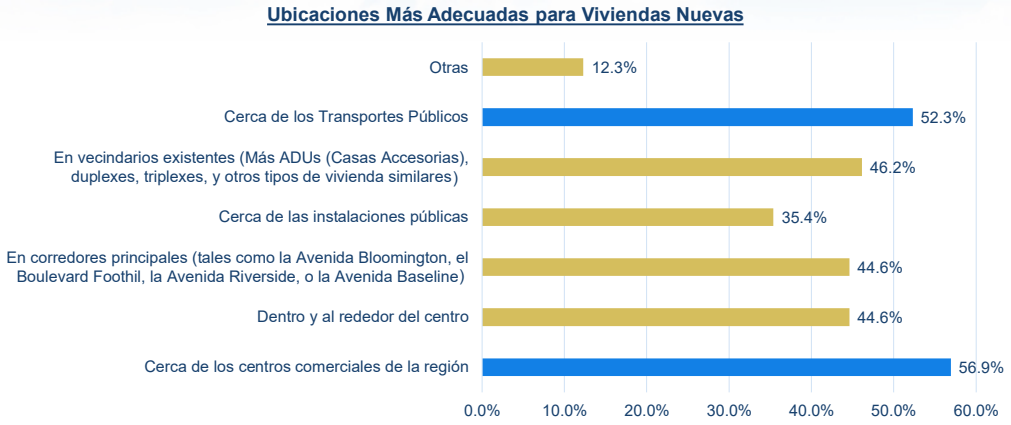
Respuestas a la Encuesta – Ubicación de las Viviendas



City of Rialto – 2021-2029 Housing Element Update

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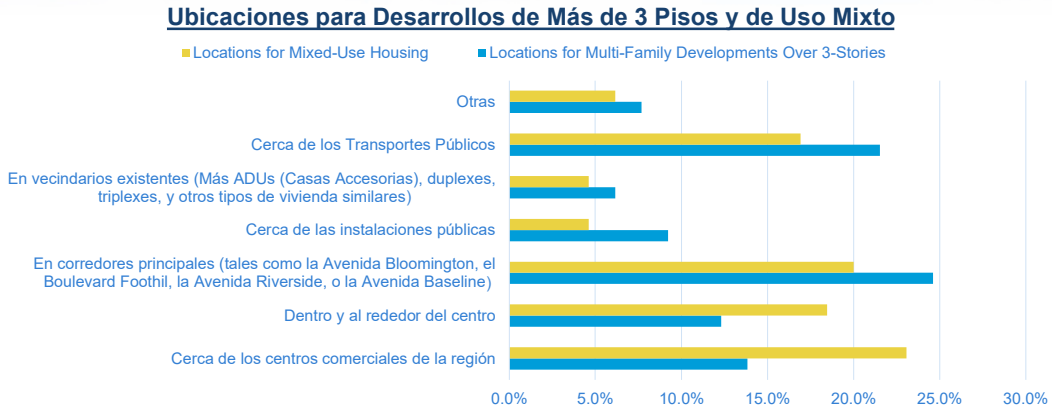
Respuestas a la Encuesta – Ubicación de las Viviendas



City of Rialto – 2021-2029 Housing Element Update

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Análisis del Inventario de Sitios y Estrategia Potencial

17

Paso 1: ¿Cuál es nuestra capacidad actual para el desarrollo residencial?

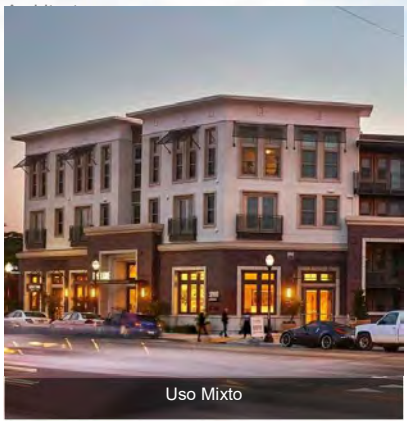
	Ingresos Bajos y Muy Bajos	Ingresos Moderados y Superiores a los Moderados
Proyectos en proceso	0	0
Parcelas desocupadas divididas en zonas residenciales	289	11,789
Parcelas residenciales no desocupadas	228	5,265
Unidades de Viviendas Accesorias	72	53
CAPACIDAD EXISTENTE TOTAL	589	**17,107**
Distribución de RHNA	3,415	4,837
Excedente/Déficit	-2,826	12,270

18

Paso 2: ¿Qué sitios podrían usarse para compensar el déficit de RHNA?

- Criterio para la identificación de Sitios:
  - Sitios vacantes
  - Parcelas con baja utilización
  - Sitios residenciales existentes con capacidad para un desarrollo de mayor densidad
  - Sitios propiedad de la ciudad
  - Sitios no residenciales existentes con capacidad para su rezonificación para uso residencial
- Sitios evaluados para determinar si existe una probabilidad realista de volver a desarrollarlos para uso residencial dentro del período de planificación

Crédito de la Fotografía: KTGY



30 unidades/ac

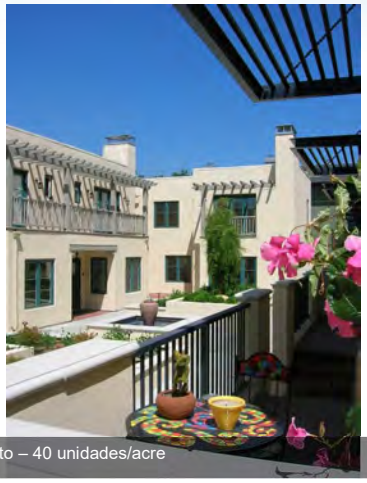
30 unidades/ac

36 unidades/ac (Asequible)

Ejemplos de Densidad– 20-36 Unidades/Acre

Crédito de la Fotografía : Moule & Polyzoides

Mission Meridian Village South Pasadena, California



67 condominios en un Desarrollo de uso mixto orientado al tránsito – 40 unidades/acre

City of Rialto – 2021-2029 Housing Element Update

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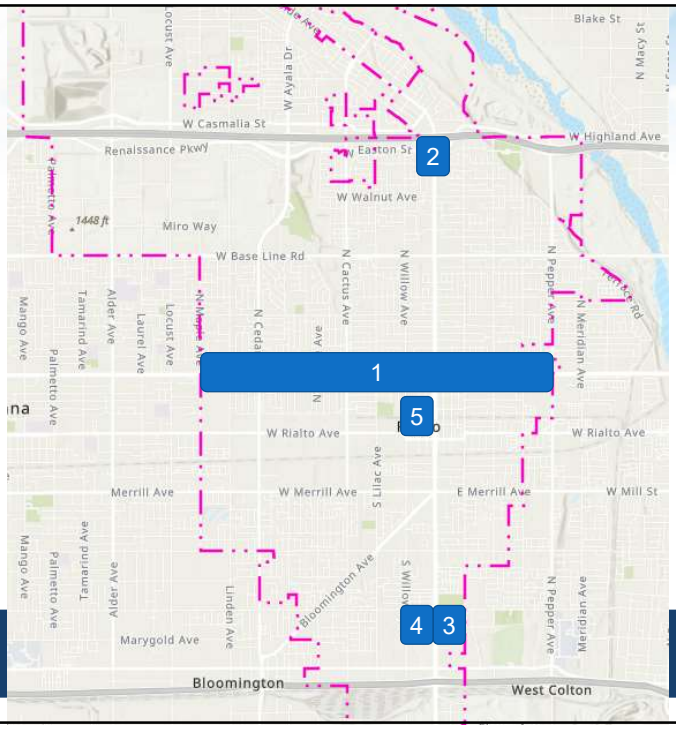
Áreas de Oportunidad



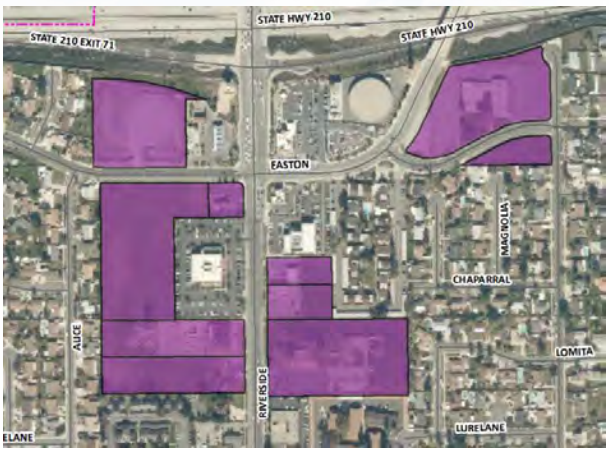
1 - Foothill Blvd
2 - North Riverside Ave
3 - South Riverside Ave
4 - Rialto Marketplace II
5 - Central Area

22

Área de Oportunidad 1 – Foothill Boulevard

- Enmienda al Plan Específico de Foothill Boulevard
  - Permite 30 unidades de vivienda por acre en proyectos de todos los tamaños

Área de Oportunidad 2 – North Riverside Ave



- Enmienda al Código de Zonificación
  - Zona Commercial del Vecindario C-1 y Zona Administrativa-Profesional-Institucional A-P a la Zona Multifamiliar de Alta Densidad R-4

Área de Oportunidad 3 y 4 – Plan Específico de Gateway

- Enmienda al Plan Específico de Gateway
  - Establecer una nueva categoría de uso del terreno y estándares de desarrollo para los lotes actualmente identificados como Comercial Minorista, Centro de Oficinas y Centro Industrial.

Área de Oportunidad 5 – Área Central

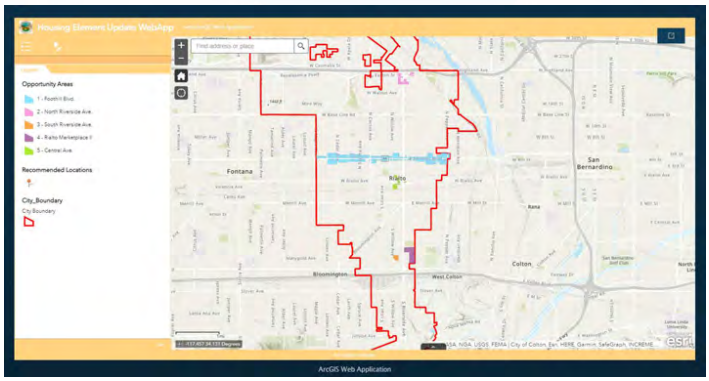
- Enmienda al Plan Específico del Área Central
  - Cambiar las parcelas que son Principalmente Comerciales, los Servicios de Oficina, las Instalaciones de Apoyo y la Cabaña Comercial a las de tipo Residencial de Mayor Densidad

Oportunidad para Comentarios

27

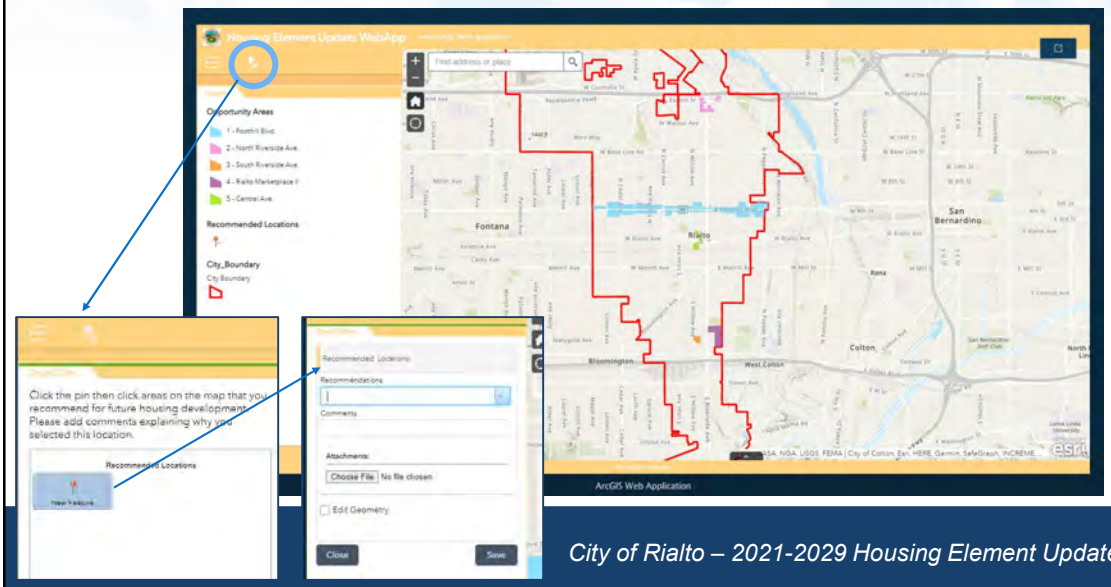
Comentarios de la Comunidad – Mapa Interactivo

- El mapa interactivo permite a los participantes:
  - Recomendar ubicaciones para posibles futuros desarrollos de viviendas
  - Ver áreas de oportunidad
- Disponible en la página web de la Actualización del Elemento de Vivienda: www.yourrialto.com/HouseOurRialto



28

Mapa Interactivo



City of Rialto – 2021-2029 Housing Element Update

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Borrador de Políticas y Programas

30

Metas Propuestas para la Política de Vivienda

- Las acciones para la política de vivienda del 5to Ciclo de 2014-2021 que actualmente funcionan bien, continúan para el 6to Ciclo 2021-2029
- Se agregaron nuevas acciones de política para acomodar nuevas disposiciones de la ley estatal
- Se han agregado acciones de política adicionales basadas en el análisis de vivienda justa

Metas de Vivienda Existentes

- **Objetivo 1**: Mantener y mejorar la calidad de las viviendas y los vecindarios existentes en Rialto
- **Objetivo 2**: Promover y fomentar el desarrollo habitacional que satisfaga adecuadamente las necesidades de todos los segmentos socioeconómicos de la comunidad y la región
- **Objetivo 3**: Maximizar el uso de los recursos financieros disponibles y buscar métodos creativos e ingeniosos para reducir el costo total de la vivienda
- **Objetivo 4**: Aliviar las posibles limitaciones gubernamentales a la producción y asequibilidad de la vivienda
- **Objetivo 5**: Promover la igualdad de oportunidades para que todos los residentes residan en la vivienda de su elección.

Ejemplo de una Política de Vivienda

Programa 5.4A - Bonificación por Densidad

Para facilitar el desarrollo, la ciudad ofrece a los desarrolladores la oportunidad de aprovechar el Programa de Bonificación por Densidad, que es un aumento de densidad del 35 por ciento más los incentivos de desarrollo para proyectos asequibles calificados. La ciudad proporcionará información sobre el Programa de Densidad en las oficinas del concejo de la ciudad y en el sitio web de la ciudad.

La ciudad actualizará su ordenanza de bonificación por densidad para cumplir con la ley estatal actual.

Plazo: En curso, 2014-2021; Proporcionar una actualización anual sobre el progreso de la Ordenanza de Bonificación de densidad como parte de la revisión y documentación del Informe anual de la ciudad.

Agencia Responsable: División de Planificación

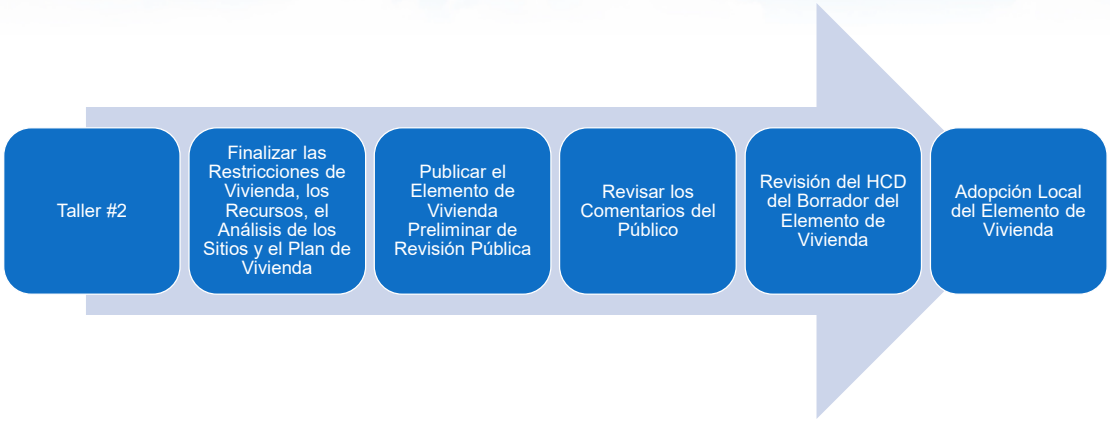
Fuentes de Financiación: Fondo General

33

Próximos Pasos

34

Próximos Pasos



¡Gracias!

Si tiene preguntas o comentarios, por favor comuníquese con:

Siri Champion, Gerente del Proyecto

Correo Electrónico: schampion@rialtoca.gov

Teléfono: (909) 820-8072

Para proporcionar sus comentarios en el mapa interactivo o para más información, visite el sitio web de La Actualización del Elemento de Vivienda: www.yourrialto.com/HouseOurRialto

C.8 Stakeholder Meeting

This section contains all available materials created for the virtual stakeholder meeting, including the presentation and the Zoom chat.

PLAN TO HOUSE OUR RIALTO

City of Rialto 6th Cycle Housing Element Update

Stakeholder Meeting

The City of Rialto has recently released the Public Review Draft of the 2021-2029 Housing Element. The Draft Housing Element includes the strategies the City will undertake to meet the RHNA allocation, the policies and programs that will implement these strategies, as well as background analysis on the City of Rialto.

The City is requesting stakeholder feedback on the Draft document. Please join us and fellow community experts for a virtual meeting to discuss the different parts of the Draft Housing Element and provide feedback.

WHEN: September 15, 2021, 3-4 p.m.

WHERE: Zoom (kimley-horn.zoom.us/j/96589096839)

WEBSITE: www.yourrialto.com/HouseOurRialto

Please visit the Housing Element Update website to view the Public Review Draft and learn more about the update process.

For questions, please contact Siri Champion, Project Planner at schampion@rialtoca.org or (909) 820-8072

PLAN DE VIVENDAS EN NUESTRO RIALTO

6o Ciclo de la Actualización del Elemento de Vivienda

Reunión de Partes Interesadas

La Ciudad de Rialto ha publicado recientemente el plan preliminario de Revisión Pública del Elemento de Vivienda 2021-2029. El plan preliminario del Elemento de Vivienda incluye las estrategias que la ciudad emprenderá para cumplir con la distribución de RHNA, las políticas y programas que implementarán estas estrategias, así como el análisis de antecedentes sobre la ciudad de Rialto.

La Ciudad está solicitando comentarios de las partes interesadas acerca del plan preliminario del documento. Por favor únase a nosotros y a otros expertos de la comunidad en una reunión virtual para discutir las diferentes partes del Proyecto de Elemento de Vivienda y para proporcionar sus comentarios.

FECHA: 15 de septiembre de 2021, 3-4 p.m.

LUGAR: Zoom (kimley-horn.zoom.us/j/96589096839)

SITIO WEB: www.yourrialto.com/HouseOurRialto

Por favor visite el sitio web de la Actualización del Elemento de Vivienda para ver el plan preliminario de la Revisión Pública y obtener más información acerca del proceso de actualización.

Si tiene preguntas, por favor comuníquese con Siri Champion, Planificadora del Proyecto en schampion@rialtoca.org o (909) 820-8072.

Plan to House Our Rialto:

2021-2029 Housing Element Update

Stakeholder Workshop

1

Agenda

- Housing Element Update Background
- Community Engagement
- Candidate Housing Sites and Strategy
- Goals, Policies, and Programs
- Next Steps

2

Housing Element Update

3

Housing Element Background

- Required element of the City's General Plan
- Requires adoption by the State Department of Housing and Community Development (HCD)
- Updated on 8-year cycles
- Statutory Deadline: October 15, 2021

Income Category	% of Area Median Income (AMI)	Income Range[1]		RHNA Allocation (Housing Units)
		Minimum	Maximum	
Very Low Income	0 - 50% AMI	--	$38,750	2,218 units
Low Income	51 – 80% AMI	$38,751	$62,000	1,206 units
Moderate Income	81 – 120% AMI	$62,001	$93,000	1,371 units
Above Moderate Income	>120% AMI	$93,001	--	3,477 units
			TOTAL:	8,272 units

1. Income range is based on the 2021 HUD Area Median Income (AMI) for San Bernardino County of $77,500 for a family of 4.

City of Rialto – 2021-2029 Housing Element Update

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New Legislation for Housing Elements

- **Funding Measures**:
  - SB 2
  - SB 3
- **Streamlining Measures**:
  - SB 35
  - SB 540
  - AB 73
  - AB 2753
  - SB 765
  - SB 330
  - AB 1485
  - SB 744
- **Accountability Measures**:
  - AB 167
  - AB 678
  - AB 1515
- **ADU Measures:**
  - AB 68
  - AB 881
  - SB 13
  - AB 587
  - AB 670
  - AB 671
- **Other Measures**:
  - AB 1505
  - AB 879
  - AB 1397
  - AB 72
  - AB 2372
  - SB 1227
  - AB 2797
  - AB 3194
  - SB 765
  - And more

5

Affirmatively Furthering Fair Housing (AFFH)

- Fair and equitable distribution of housing throughout the community
- Protects against communities being overburdened
- Takes into consideration:
  - A variety of housing types (single-family house, apartment, townhome, etc.)
  - Mix of affordability levels
  - Access to transportation and employment
- Considers access to public transit and community resources

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Housing Element Components

- Section 1 - Introduction
- Section 2 - Population and housing profile
- Section 3 - Evaluation of housing constraints and resources
- Section 4 - Policies, programs, and quantified objectives to achieve the City's identified housing goals
- Appendix A - Evaluation of current programs and policies
- Appendix B - Analysis and identification of sites to accommodate the City's RHNA allocation
- Appendix C - Summary of Community Outreach
- Appendix D - Glossary of Housing Terms

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Community Engagement

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Summary of Outreach Efforts

- Completed Outreach:
  - Virtual community workshop #1 - May 19th, 2021
  - Virtual community workshop #2 - July 15th, 2021
  - Spanish-speaking workshop – July 17th, 2021
  - Self-Guided Workshop - in person and online
  - Informational postcards sent to the community
  - Community surveys – in person and online
  - Interactive Map
  - Public comments at City Council and Planning Commission meetings
- Spanish translations provided
- Online advertising on social media and the City's website

City of Rialto – 2021-2029 Housing Element Update

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Candidate Housing Sites and Strategy

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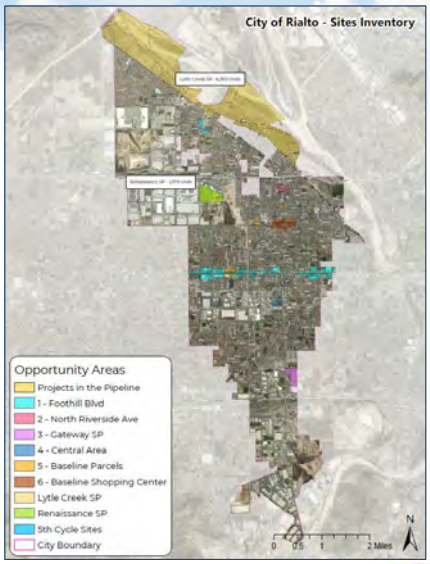
Sites Analysis

- Projects "In-the-Pipeline"
- Projected ADU development
- 5th Cycle sites
- Existing capacity in entitled Specific Plan (Lytle Creek Ranch and Renaissance)
- Capacity under existing zoning in identified Opportunity Areas

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2021-2029)	2,218	1,206	1,371	3,477	8,272

Opportunity Areas

- 6 areas identified for upzone/rezone
  - 1 – Foothill Blvd. Specific Plan
  - 2 – North Riverside Ave.
  - 3 – Gateway Specific Plan
  - 4 – Rialto Central Area Specific Plan
  - 5 – Baseline Parcels
  - 6 – Baseline Shopping Center
- Default density for lower-income housing: 30 dwelling units/acre



1 - Foothill Blvd. Specific Plan

Opportunity Area 1 - Foothill Boulevard Specific Plan Analysis					
Feasible Acreage	Assumed Density	Capacity of Sites			
		Low/Very Low	Moderate	Above Moderate	Total
162 acres	35 du/acre	3,096	284	2,242	5,622

City of Rialto – 2021-2029 Housing Element Update

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2 – North Riverside Ave

Opportunity Area 2 – North Riverside Avenue Analysis					
Feasible Acreage	Assumed Density	Capacity of Sites			
		Low/Very Low	Moderate	Above Moderate	Total
17 acres	39 du/acre	220	19	160	399

City of Rialto – 2021-2029 Housing Element Update

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3 – Gateway Specific Plan

Opportunity Area 3 – Gateway Specific Plan Analysis					
Feasible Acreage	Assumed Density	Capacity of Sites			
		Low/Very Low	Moderate	Above Moderate	Total
38 acres	35 du/acre	734	67	531	1,332

4 – Rialto Central Area Specific Plan

Opportunity Area 4 – Rialto Central Area Specific Plan Analysis					
Feasible Acreage	Assumed Density	Capacity of Sites			
		Low/Very Low	Moderate	Above Moderate	Total
14 acres	38 du/acre	255	11	204	470

5 – Baseline Parcels

Opportunity Area 5 – Baseline Parcels Analysis					
Feasible Acreage	Assumed Density	Capacity of Sites			
		Low/Very Low	Moderate	Above Moderate	Total
9 acres	35 du/acre	112	8	84	204

6 – Baseline Shopping Center

Opportunity Area 6 – Baseline Shopping Center Analysis					
Feasible Acreage	Assumed Density	Capacity of Sites			
		Low/Very Low	Moderate	Above Moderate	Total
57 acres	30 du/acre	466	44	336	846

Sites Buffer

- Sites strategy considers future developments may be at lower densities than permitted
- Future development may be at different affordability levels than assumed
- Avoids “no-net loss” implications

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2021-2029)	2,218	1,206	1,371	3,477	8,272
Total Potential Development Capacity	4,957		1,505	10,520	16,982
Sites Surplus/Shortfall (%)		45%	10%	203%	105%
Sites Surplus/Shortfall (#)		1,533	134	7,043	8,710

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Goals, Policies, and Programs

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Housing Element Goals

- **Housing Goal #1**: Maintain and improve the quality of existing housing and neighborhoods in Rialto.
- **Housing Goal #2**: Promote and encourage housing development that adequately meets the needs of all socioeconomic segments of the community and region.
- **Housing Goal #3**: Maximize the use of available financial resources and pursue creative and resourceful methods to reduce the overall cost of housing.
- **Housing Goal #4**: Alleviate potential governmental constraints to housing production and affordability.
- **Housing Goal #5**: Promote equal opportunity for all residents to reside in the housing of their choice.

Policy Program – ADU Monitoring

Housing Program 2C: Accessory Dwelling Unit Monitoring Program

- The City will establish an ADU Monitoring Program during the 2021-2029 Housing Element Planning Period to formally track ADU development. The analysis will track applications for ADUs, location, and other important features. The intent of the Monitoring Program is to track progress in meeting 2021-2029 ADU construction goals and to evaluate the need to adjust programs and policies if the pace of construction is less than anticipated.

Timeframe: Annually, 2021-2029
Responsible Agency: Planning Division
Funding Sources: General Fund

Sample Policy Programs

- Promotion of Accessory Dwelling Unit (ADU) and Junior Accessory Dwelling Unit (JADU) Development
- Objective Development Standards
- SB 35 Streamlining
- Emergency Shelters, Transitional and Supportive Housing, and Lower Barrier Navigation Centers
- Housing for Persons with Developmental Disabilities

City of Rialto – 2021-2029 Housing Element Update

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Sample Policy Programs

- Farmworker Housing
- Funding and Rental Assistance Programs
- Preserve and Monitor At-Risk Units
- Mobile Home Park Preservation
- Housing Voucher Program
- Density Bonus
- Remove Development Constraints
- Fair Housing

City of Rialto – 2021-2029 Housing Element Update

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Next Steps

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Next Steps

Send Housing Element to HCD for first review

Adopt the Housing Element Locally
- Removes Mid-Cycle Review requirement

Review potential comments/edits from HCD and re-submit final document

Adopt locally an amendment with the corrections from HCD

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Thank You!

Questions?

Please contact:

Siri Champion, Project Manager

Email: schampion@rialtoca.gov

Phone: (909) 820-8072

For more information, please visit the City's Housing Element Update webpage: www.yourrialto.com/HouseOurRialto

01:08:54 Pablo Ramirez: Thank you. I have another meeting, but i will send Siri my questions.
01:13:24 Maria Delgado: I also noticed that in the AFFH section the cityâ€™s analysis is focused at a local level. Under the new AFFH requirement, the city must also analyze components at a regional level.
01:13:59 Ines Galmiche: Thank you Maria for your comment, we've taken note of it.
01:14:16 Maria Delgado: Thank you!
01:14:23 Jeff Green Inland Equity Community Land Trust: Thank you

C.9 Planning Commission Public Hearing

This section contains all materials available for the September 29, 2021, Planning Commission Public Hearing. A recording of the hearing is available on the City's website.

City of Rialto

Regular Meeting - Final

Planning Commission

Wednesday, September 29, 2021 **6:00 PM**

Public Participation Procedure

NOTICE IS GIVEN THAT THE CITY COUNCIL OF THE CITY OF RIALTO HAS DECLARED A LOCAL EMERGENCY RELATED TO COVID-19, AND IN COMPLIANCE WITH SOCIAL DISTANCING PROTOCOLS REQUIRED BY GOVERNOR NEWSOM'S EXECUTIVE ORDER N-29-20 AND THE STATE DEPARTMENT OF PUBLIC HEALTH, THE COUNCIL CHAMBERS WILL BE OPEN TO THE PUBLIC WITH LIMITED SEATING INSIDE. THE PUBLIC WILL HAVE AN OPPORTUNITY TO SPEAK ON ANY ITEM USING THE PODIUM INSIDE THE COUNCIL CHAMBERS.

IF YOU ARE UNABLE TO ATTEND THE MEETING, YOU MAY SUBMIT COMMENTS ON ANY AGENDA ITEM AT LEAST TWO (2) HOURS BEFORE THE MEETING TIME, AS FOLLOWS:

- IN WRITING VIA MAIL TO: CITY OF RIALTO "ATTN: PLANNING COMMISSION, C/O COMMUNITY DEVELOPMENT," 150 S PALM AVE, RIALTO, CA 92376; OR
- BY EMAIL TO PLANNING@RIALTOCA.GOV.

Call To Order

Pledge of Allegiance

Roll Call

Chair Frank Gonzalez, Vice-Chair Jerry Gutierrez, John Peukert, Artist Gilbert, Al Twine, Dale Estvander, BarBara Chavez

Oral Communications from the Audience on items not on the Agenda

Planning Commission Minutes

PC-21-0666

Minutes from the July 14, 2021 Special Workshop meeting.

Attachments: PC Minutes 7-14-2021 Special Workshop Meeting.docx

PC-21-0671

Minutes from the July 28, 2021 Planning Commission meeting.

Attachments: PC Minutes 7-28-2021.docx

Public Hearings

PC-21-0670

Conditional Development Permit No. 2021-0033: A request to allow the establishment and operation of an undergraduate college within approximately 11,000 square feet of an existing church development located 2759 North Ayala Drive (APNs: 1133-361-01) within the Single Family Residential (R-1A 10,000) zone. This project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15301 (Existing Facilities Projects) of the State CEQA Guidelines (Environmental Assessment Review No. 2021-0036).

Attachments: EXHIBIT A - Location Map

EXHIBIT B - Project Site

EXHIBIT C - Floor Layout

EXHIBIT D - Draft Resolution

Presentation

PC-21-0677

Request the Planning Commission receive and file a status update on the Draft 6th Cycle Housing Element Update 2021-2029

Attachments: Attachment 1 - Draft 6th Cycle Housing Element Update.pdf

Attachment 2 - Letter to Property Owners.pdf

Attachment 3 - Property Owner Responses.pdf

Attachment 4 - Comment Letter.pdf

Planning Division Comments

PC-21-0672

Planning Commission - Miscellaneous Items Tracking Report

Attachments: PC Misc. Items Tracking Report - 9-29-2021

Commissioner Reports

Adjournment

C.10 City Council Public Hearing

This section contains all materials available for the October 12, 2021, City Council Public Hearing. A recording of the hearing is available on the City's website.

C.11 Additional Public Comments

This section contains all additional public comments received by the City during the 2021-2029 Housing Element Update process. Comments received through surveys, workshops, and meetings are included in the previous sections.

City of Rialto
California

August 13, 2021

<<Mailing Address>>

RE: RIALTO HOUSING ELEMENT UPDATE – HOUSING OPPORTUNITY SITES

Dear Property Owner:

The City of Rialto is in the process of updating the General Plan Housing Element for the 2021-2029 planning period. Under State mandate, all cities are required to plan for future housing need, including affordable housing. As part of this update, the City will identify potential sites that might accommodate more residential development in the future. It is important to understand, the Housing Element will not affect property rights or change what is currently allowed on your property; it will only identify your property as having the potential to accommodate residential development should you or a future property owner want to pursue such development – entirely at your choice.

We have identified your property at <<Site Address>> as a potential "Opportunity Site" for future residential development. This will not change the existing land use or your current property rights. More importantly, being identified as a potential "Opportunity Site" does not indicate that the City is considering the acquisition of your property for construction of new housing. **The City through the Housing Element Update process is not acquiring any property**. The Housing Element Update will only identify ***potential*** sites where residential development ***might*** occur in the future. As property owner, you will retain your right to choose what to do with your property and identifying your property for potential housing development will not mandate or require you or future owners to do or change anything.

The purpose of this letter is to provide you the opportunity to review and comment on the City's public draft 2021-2029 Housing Element Update and the identification of your property as a potential "Opportunity Site." We are very interested to hear from you. Please contact me via email, phone, or letter at:

Siri Champion, Senior Planner
City of Rialto
150 S Palm Avenue
Rialto, CA 92376
schampion@rialtoca.gov
909-820-8072

We hope to hear from you by September 13. Please contact us at your earliest convenience. To view the public draft "Plan to House Our Rialto: 2021-2029 Housing Element Update", please visit www.yourrialto.com/HouseOurRialto.

Thank you for your time and attention to this matter.

Respectfully,

Siri A. Champion, Senior Planner

From: julies418 <julies418@aol.com>
Sent: Tuesday, August 17, 2021 9:40 AM
To: Siri Champion <schampion@rialtoca.gov>
Subject: RE: 230 S Orange

We are open to selling 230 s orange to the city for future development.
Thank you
Julie Salazar

From: jose vindel <jvindel@att.net>
Sent: Thursday, August 26, 2021 11:03 AM
To: Siri Champion <schampion@rialtoca.gov>
Subject: Responding to your letter: Rialto Methodist Church as potential "Opportunity Site" for future residential development

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Siri

Thank you for your letter identifying Rialto United Methodist Church at 1230 N. Lilac Ave as a potential "Opportunity Site" for future development. When the time comes, and if considered by the city, Rialto UMC is willing enter in conversation regarding this matter.

Thank you very much for you letter

Rev. Jose Vindel

Pastor, Rialto UMC

From: Jared Sopko <jared@sopkoprojects.com>
Sent: Friday, September 17, 2021 1:43 PM
To: Siri Champion <schampion@rialtoca.gov>
Subject: Housing Opportunity Site: APN 012725114

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms. Champion,

Thank you for your outreach and interest in including our site, APN: 012725114, into the Housing Opportunity Sites. We are interested in the offer to add our parcel to consideration for an eventual overlay zone that would allow residential development.

Please contact me should you need any additional information.

Regards,

Jared Sopko
Project Manager,
Cloverfield Management, LLC,
Manager for Allied Farms, Inc.

--
Jared Sopko, LEED AP
jared@sopkoprojects.com
O: (424) 214-2164

Galmiche, Ines

From: Siri Champion <schampion@rialtoca.gov>
Sent: Thursday, October 7, 2021 4:19 PM
To: Galmiche, Ines
Cc: Barquist, Dave
Subject: FW: Rialto Parcels

Categories: External

Hi Ines,
Please find William Lee's request to include his parcels below.
Thanks,
Siri

Siri A. Champion
Community Development – Planning Division
CITY OF RIALTO
150 S. Palm Avenue, Rialto, CA 92376
Office: 909-820-8072 | **Email:** schampion@rialtoca.gov | **Website:** www.yourrialto.com

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From: William Lee <w.y.lee.913@gmail.com>
Sent: Thursday, October 7, 2021 4:17 PM
To: Siri Champion <schampion@rialtoca.gov>
Subject: Re: Rialto Parcels

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Siri, appreciate the prompt response. Yes please include our properties on the opportunity area list. The 6 APNs are below:

0132-021-03
0132-021-12
0132-021-13
0132-021-14
0132-021-15
0132-021-04

Thank you,
William Lee
(626) 922-7799

On Thu, Oct 7, 2021 at 3:27 PM Siri Champion <schampion@rialtoca.gov> wrote:

Hi William,

Inclusion in the housing element as an opportunity area does not change the zoning. If your properties are included, they will be considered for a rezone in the future. That rezone could, but would not necessarily, establish a minimum density. If your properties are not included, you still have the opportunity as the property owner to request a zone change in the future. If you'd like to be included, we need something from you in writing by tomorrow.

Many thanks,

Siri

Siri A. Champion

Community Development – Planning Division

CITY OF RIALTO
150 S. Palm Avenue, Rialto, CA 92376
Office: 909-820-8072 | **Email:** schampion@rialtoca.gov | **Website:** www.yourrialto.com

---

From: William Lee <w.y.lee.913@gmail.com>
Sent: Thursday, October 7, 2021 3:20 PM
To: Siri Champion <schampion@rialtoca.gov>
Subject: Re: Rialto Parcels

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Siri,

Thanks for following up. I've been reading your Draft Housing Element Update and doing some research. I've been trying to understand if being included in these potential changes means that future development **MUST** meet a minimum density? For example, if the zoning is changed to R4, and in the future we wanted to do something in the 12-21 DU/acre range, is that still allowed? Or does any new development have to be at

least in the 30DU/acre range? Any further info you can give me would be greatly appreciated.

Also, is there a deadline you need this request by?

Thanks,

William Lee

(626) 922-7799

On Wed, Oct 6, 2021 at 9:30 PM Siri Champion <schampion@rialtoca.gov> wrote:

> Hi William,
>
> I am writing in regards to the six parcels you own in Rialto south of Randall Avenue and between Lilac Ave and S. Millard Avenue. We corresponded about them previously and discussed the Housing Element Update. Do you want those properties incorporated in the Housing Element as an opportunity area for increased density residential? If so, would you please prepare an email that lists the parcels and requesting that they be included?
>
> Many thanks,
>
> Siri
>
> **Siri A. Champion**
>
> Community Development – Planning Division
>
> **CITY OF RIALTO**
> 150 S. Palm Avenue, Rialto, CA 92376
> **Office:** 909-820-8072 | **Email:** schampion@rialtoca.gov | **Website:** www.yourrialto.com
> **CUSTOMERCARE | SAME DAY RESPONSE**

costanzo investments™

Real Estate Development, Acquisition and Management

September 21, 2021

Ms. Siri Champion
Senior Planner
Community Development Department
City of Rialto
150 S. Palm Avenue, Rialto, CA 92376

Re: Housing Element Update, Gateway Specific Plan Amendment, Site Inventory #122-123

Dear Ms. Champion:

We are an established Southern California real estate development firm that is under contract to acquire and develop the two properties consisting of 18 +/- acres on the Southeast corner of South Riverside Avenue and East San Bernardino Avenue (APNs 0132-092-01 & 0132-252-01) in South Rialto (the "Property"). It has come to our attention that the City is in the process of updating the Housing Element of its General Plan, which will ultimately result in changes in policy as well as amendments to both the City's General Plan and the Gateway Specific Plan (which applies to our Property). We appreciate the opportunity to review and comment on the proposed Housing Element Update.

To begin, we appreciate and support the City's interest in allowing the development of residential on the Property. Housing demand is at historic levels, and providing developers the ability to develop more housing for the City's constituents is essential to meet such demands and combat the rising costs of home ownership and rental. It also happens to be a good use for a substantial portion of our Property. Retail is the best and highest use for the part closest to Riverside Avenue, but neither retail nor office are economically viable uses for the rear or East portion of the Property. Residential would be a good fit behind the retail since it is surrounded by other residential and in close proximity to freeway access and regional retail and services. As a result, we are currently in the process of preparing plans to submit to the City for the development of retail on the portion of the Property adjacent to Riverside Avenue and residential for the balance of the Property.

We are writing this letter, however, because we are deeply concerned about the City's proposed identification of our Property as a suitable site for high-density and affordable housing in the General Plan's Housing Element Update. High density and affordable housing in this South Rialto submarket – and in particular on this Property – are not economically feasible now or in the forseeable future. The construction costs for this type of product require a rent structure or sale price that is not achievable in this submarket. Further, projects of this size and type typically require structured debt financing, and such financing is almost uniformly not available for this type of product in the Inland Empire (exceptions being premium rent / sale price locations such as TOD sites and affluent denser areas like in Rancho Cucamonga). Enclosed for your consideration is a letter from Land Advisors – residential brokers with

17 Corporate Plaza Drive, Suite 250, Newport Beach CA, 92660 | t. 949.566.8021 | ccostanzo@costanzoinv.com

extensive experience in the IE residential market – in support of our view that such residential product type is not feasible in this submarket and won't be in the forseeable future.

This is especially true for our Property. In addition to general market challenges, our Property will be more costly to develop because of mitigation costs associated with the federally-protected endangered species, the Delhi Flower-Loving Sand Fly (the "Sand Fly"). Habitat assessments have identified significant suitable Sand Fly habitat on the Property. As such, we will have to purchase sufficient Sand Fly conservation land elsewhere to mitigate the displacement of Sand Fly habitat on our Property in order to develop it. Our environmental consultant is in the process of working with the US Fish and Wildlife to determine the full extent and cost of such mitigation, but the range of such mitigation costs based on current mitigation agreements with surrounding landowners are all in the several millions of dollars. This additional financial burden to develop our Property makes it one of the least likely locations in this submarket for a high density / affordable housing project. In fact, based on the above and our/Land Advisor's experience and market analysis, the only economically viable residential development that can be pursued at this location is a market rate one with a density of 8 and 16 units per acre. Higher densities make a residential development here uneconomic and therefore infeasible. And without the residential development, the retail component of the development will also not be viable.

For the reasons stated above, we strongly encourage the City to reconsider its identification of the Property for high density and affordable housing in the Housing Element Update and plan amendments. Such designation may satisfy paper mandates from the State, but it is simply not realistic. More importantly, it might complicate the City's ability to approve our mixed use project with an economically viable residential component (especially in light of the recently passed laws, including SB-8 (https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB8)). At the very least, we urge the City to remove any reference to a potential minimum density on our Property, even if it's not binding, and allow for lower densities between 8-16 du/ac. This would allow the City to comply with the State's RHNA requirements without unnecessarily complicating the City's policies and its ability to maintain local control and flexibility in determining whether to approve our forthcoming plan amendments and project application. By doing the above, the City avoids the potential for misuse and abuse of the State law's "consistency" requirement as a tool to frustrate the City's efforts to address the immediate need of housing and additional retail/services for its constituents.

Thank you for your consideration of our concerns and comments. Please don't hesitate to contact us if you would like to discuss this further or need any additional information.

Best Regards,

Chris Costanzo
Managing Member

Land Advisors®
ORGANIZATION

September 21, 2021

Siri Champion
Senior Planner
Community Development Department
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

RE: Housing Element Update, Gateway Specific Plan, Site Inventory #122-123
Assessor's Parcel Numbers: 0132-092-01, 0132-252-01

Dear Ms. Siri,

We are residential land brokers with approximately 40 years of experience focused exclusively on the Inland Empire. We are currently engaged by the County of San Bernardino as consultants to assist in its sale of 2,900 units in Rancho Cucamonga. This week, we hosted the auction and sale of more than 1,600 acres in the City of Highland on behalf of the County of Orange. And, last year, we managed the sale of 328 units in the City of Loma Linda on behalf of its Success Agency. We are intimately familiar with the goals proposed by the Regional Housing Needs Allocation (RHNA) and the municipalities needs to update their Housing Elements accordingly.

We received notification that the above-referenced parcels ("Subject Property") have been identified as an opportunity area within the Housing Element Update currently in process by the City of Rialto. It is our understanding the Housing Element Update plans an amendment to the Gateway Specific Plan to add a new residential zoning district to facilitate high-density residential development. This new residential zone would assume an average density for the Subject Property of 35 dwelling units per acre — yielding an estimated 635 units on approximately 18 acres.

The proposed density does not fit with current or anticipated market conditions. In the last five years, there have been zero new residential developments to achieve the proposed density. There has been only one community with a density over 20 dwelling units per acre. Built in December 2017, Santa Barbara Luxury Apartments, located at 606 South Riverside Avenue, yields a density of approximately 22 dwelling units per acre. Otherwise, all recent and anticipated new home development in this submarket has consisted of conventional single-family residences or attached townhomes with densities less than 12 dwelling units per acre. Higher density product at the Subject Property is unachievable because base home pricing does not support its development, nor do we see any prospect of this changing in the near or forseeable future.

We understand and support the City's need to meet its RHNA goals. We recommend the City propose a density for the Subject Property ranging from 8 to 16 dwelling units per acre. Any density above 16 dwelling units per acre will result in attached three-story product, which is not financially feasible for the Subject Property in the current market. If the City proposed a density up to 16 dwelling unit per acre for the Subject Property, then it would generate much needed new housing in the near future.

We want to see new housing built on the Subject Property; however, the proposed density will not achieve that goal. Any high-density or affordable housing designation will have a substantial negative impact on the Subject Property's land value. We believe the recommended density (8-16 du/ac) will better contribute to the fulfillment of the City's vision as established in the General Plan Update.

We thank you for your time and consideration. We have enclosed a copy of our biographies. Please feel free to contact us with any questions.

Sincerely,

Doug Jorritsma

Doug Jorritsma
Senior Vice President
Land Advisors Organization
d. (949) 656-8004
e. djorritsma@landadvisors.com

Ian Sinderhoff

Ian Sinderhoff
Vice President
Land Advisors Organization
d. (949) 656-8005
e. isinderhoff@landadvisors.com

Enclosed: Land Advisors Organization, West San Bernardino Team Flyer

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Senior Vice President
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IAN SINDERHOFF

Vice President
Land Advisors Organization
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Lic. 01948291

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- 8+ years of experience in land brokerage
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- Environmental Law Attorney

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RACHEL BUBA

Marketing & Brokerage Coordinator
Land Advisors Organization
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rbuba@landadvisors.com

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- 10+ years of experience in marketing & real estate
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Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

September 7, 2021

Siri Champion
Senior Planner
City of Rialto
150 South Palm Avenue
Rialto, CA 92376
Em: schampion@rialtoca.gov

RE: City of Rialto 6th Cycle RHNA Housing Element Update.

Dear Ms. Champion

On behalf of the Southwest Regional Council of Carpenters ("**Commenter**" or "**Carpenter**"), my Office is submitting these comments on the City of Rialto's ("**City**") 6th Cycle Draft Housing Element Update ("**Project**").

The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected

to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("**CEQA**"), Cal Public Resources Code ("**PRC**") § 21000 *et seq*, and the California Planning and Zoning Law ("**Planning and Zoning Law**"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

The City should require the use of a local skilled and trained workforce to benefit the community's economic development and environment. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

> . . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to "promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions."[3]

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City "[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential

---

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10

[3] City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . ."[4] In addition, the City of Hayward requires all projects 30,000 square feet or larger to "utilize apprentices from state-approved, joint labor-management training programs."[5]

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[6]

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.[7] Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing." The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When

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[4] City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf.

[5] City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

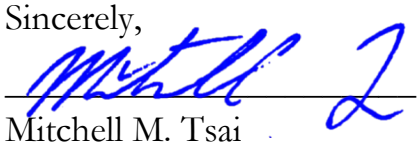
[6] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[7] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

Sincerely,



Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

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(949) 887-9013
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Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

---

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

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September 28, 2021

Planning Commission, City of Rialto
Siri Champion, Community Development Department
150 S. Palm Avenue
Rialto, CA 92376

Re: City of Rialto's Draft 6th Cycle Housing Element (2021-2029)

Dear Planning Commission and Ms. Champion,

Inland Counties Legal Services (ICLS) writes to provide comments regarding the City of Rialto's Draft Sixth Cycle Housing Element, dated August 2021 (Draft). While we are pleased that the City has prepared a Draft and is moving toward adoption of its Sixth Cycle Housing Element, we have identified multiple substantive deficiencies in the Draft, described below. We provide these comments to the City to encourage the City's correction of these deficiencies before adopting the Draft. We also encourage the City to submit its draft housing element to the California Department of Housing and Community Development (HCD) for review prior to adoption of the Draft. ICLS previously commented by email of September 1, 2021, that the City's plan to adopt the Draft before submitting it to HCD is in violation of Government Code section 65585(b)(1).

1. Sites Inventory Analysis

The inventory of sites available for housing development does not satisfy the requirements of Housing Element law. "The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower-income housing, moderate-income housing, or above moderate-income housing." Gov. Code § 65583.2(c). The Draft does not identify adequate sites with a realistic capacity to accommodate the lower income Regional Housing Needs allocation (RHNA) during the current planning period consistent with its duty to affirmatively further fair housing.

a. Realistic Capacity

For all sites identified, the housing element must describe the methodology used to determine the number of units calculated based on following factors: (1) land use controls and site improvements requirements, (2) realistic development

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capacity for the site, (3) typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, (4) the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. Government Code section 65583.2(c)(2); see also Housing Element Sites Inventory Guidebook (June 10, 2020), 19. The realistic capacity calculation must be adjusted to reflect capacity limits, especially when the site has a potential to be developed with nonresidential uses or has an overlay zone. Housing Element Sites Inventory Guidebook, 20. The Draft relies on six opportunity areas, described below, which require rezoning programs or overlay zoning to allow residential development.

Foothill Boulevard Specific Plan. According to Table B-1: Summary of RHNA Status and Sites Inventory in Appendix B, Inventory of Adequate Sites, the Draft relies on 1,472 low income and very-low income units within the Foothill Boulevard Specific Plan with the existing zoning. Draft, B-3. The current zoning allows for 30 dwelling units per acre when developing on at least three acres. Draft, B-15. According to Table B-1: Summary of RHNA Status and Sites Inventory, the Draft also relies on 1,624 units within the Foothill Boulevard Specific Plan with an rezone/upzone programs. While the Draft mentions that an amendment to 35 dwelling units per acre "would create the opportunity for 2,532 very low-/low-income housing units" in Appendix B, Inventory of Adequate Sites, the programs included in the Draft do not include any specific action to rezone/upzone the Foothill Boulevard area. Draft, B-15. Without a specific program that includes concrete steps to make sites available for lower income households, the City cannot rely on the additional 1,624 units in the Foothill Boulevard Specific Plan.

North Riverside Avenue. According to Table B-1: Summary of RHNA Status and Sites Inventory, the Draft relies on 1 low income or very-low income unit in North Riverside Avenue with existing commercial zoning, and 219 low income and very-low income units with rezone/upzone programs, a total of 220 units. Draft, B-3. However, on page B-17 of the Appendix B, Inventory of Adequate Sites, the Draft states that this opportunity area "has potential to accommodate 399 housing units, including 179 housing units affordable to very low-/low-income households. This would require the creation of an overlay . . . to allow residential development at a maximum density of 48.4 dwelling units per acre and an assumed density of 39 dwelling units per acre". Draft, B-17. But the programs included in the Draft do not include any specific action for an overlay with a specific timeframe for completion. Without a program to adopt an overlay zone to make sites available for lower income households, the City cannot rely on the 219 units for low income and very-low income households.

Gateway Specific Plan. The Draft relies on 734 low income and very-low income units in the Gateway Specific Plan. However, the current zoning in the Gateway Specific Plan allows for office, industrial parks, and commercial use only. Draft, B-19. The Draft acknowledges that this opportunity area would require a change to the zoning on the parcels, but it does not include a specific rezoning program. Without a rezoning program including concrete steps and timeframes, the City cannot rely on the 734 lower income household units in the Gateway Specific Plan.

Central Area Specific Plan. Sites smaller than one half acre may only count toward lower income units when the Draft demonstrates "that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income household units" or other evidence that demonstrates the sites are adequate to accommodate lower income units. Gov. Code Section 65583.2(c)(2)(A). The Draft relies on the Central Area Specific Plan to accommodate 255 lower income units, only 15 units of which could be accommodated with the existing zoning, according to Table B-1: Summary of RHNA Status and Sites Inventory. Draft, B-3. The Draft acknowledges that an overlay district is required to accommodate more lower income units, including 255 lower income household units; however, the programs in the Draft do not include a specific program with overlay requirements. Moreover, the Draft relies on 58 sites that are smaller than one half acre within the Central Area Specific Plan. Draft, B-21. The Draft does not include the analysis required under Government Code Section 65583.2(c)(2)(A) for sites smaller than one half acre.

Baseline Parcels and Baseline Shopping Center. Finally, the Draft is also relying on rezone programs in Baseline Parcels and a Baseline Shopping Center to accommodate lower income household units. Most of the parcels in Baseline Parcels are less than one half acre. However, the Draft does not include a program to facilitate the consolidation of small lots in the Baseline Parcels opportunity area, nor does it include a program to rezone commercial zoning in the Baseline Shopping Center. California Department of Housing and Community Development, Housing Element Site Inventory Guidebook (Site Inventory Guidebook), page 16 (available at https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf).

Therefore, the sites inventory does not identify sufficient available sites with the capacity to accommodate the lower income RHNA in the sixth cycle planning period.

b. Infrastructure Availability

The housing element must include an analysis "describing existing or planned water, sewer, and other dry utilities supply, including the availability and access to parcels on the site inventory, distribution facilities, general plan programs or other mandatory program or plan (including a program or plan of a public or private entity to secure water or sewer service) to support housing development on the site." Sites Inventory Guidebook, page 8. The Sites Inventory in Appendix B of the Draft does not provide specific information about infrastructure availability for each identified site. HCD's Sites Inventory Form, now mandatory pursuant to SB 6, requires this analysis be included on a site-specific basis. The Draft mentions infrastructure as a potential constraint because it can increase costs of new construction; however, it does not evaluate the infrastructure availability for the sites identified. The Draft must include an analysis of its infrastructure availability.

c. Affirmatively Furthering Fair Housing

The Draft fails to evaluate adequately the identified sites relative to the City's duty to affirmatively further fair housing required by Government Code section 65583(c)(10)(A). The Draft does not include a discussion of whether or how development the selected sites will integrate the community; nor does it discuss how such development will transform racially and ethnically concentrated areas of poverty into areas of opportunity. See California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance (AFFH Guidance), pg. 21 (available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf); Gov. Code §§ 65583(c)(5). Further analysis is necessary to ensure that development of the identified sites will affirmatively further fair housing.

2. Assessment of Fair Housing

Assembly Bill 686 now requires that housing elements include a robust assessment and analysis of contributing factors to fair housing issues that limit or deny fair housing choice or access to opportunity, including (1) ongoing and concentrated segregation and integration, (2) disparities in access to opportunity, (3) racially concentrated areas of poverty, and (4) disproportionate housing needs and displacement risk. See https://www.hcd.ca.gov/community-development/affh/index.shtml. The Draft needs more analysis of these contributing factors to comply with the requirements of AB 686, as set forth below.

a. Ongoing and Concentrated Segregation and Integration

The analysis must address areas of ongoing and concentrated segregation and integration and compare concentrations of protected characteristics and incomes at both a regional and local level. AFFH Guidance, pg. 31, citing Gov. Code §§ 65583(c)(10). The Draft identifies native Hawaiians as experiencing the highest levels of segregation at 40.6%. Draft, 3-36. However, the Draft does not provide an analysis of the trends and factors contributing to segregation, nor does it include an analysis of ongoing and concentrated segregation and integration at a regional level. The Draft also acknowledges high concentrations of Latinx population based on HCD's AFFH data and mapping resources, but it does not include an analysis of the contributing factors. Draft, 3-57. Moreover, the Draft mentions integration and segregation for race and ethnicity, but there is no discussion of integration and segregation for income, familial status, persons with disabilities.

b. Racially Concentrated Areas of Poverty

The analysis in the Draft must include racially and ethnically concentrated areas of poverty on a regional and a local level, where concentrated areas of poverty are discussed relative to concentrated areas of affluence. AFFH Guidance, pg. 32, citing Gov. Code §§ 65583(c)(10). The

Draft identifies one racially or ethnically concentrated areas of poverty in the City's downtown area, where it partly relies on to accommodate lower income household units. Draft, 3-37. The Draft does not analyze racially and ethnically concentrated areas of poverty at a regional level, nor does it include a discussion of local concentrated areas of poverty relative to concentrated areas of affluence.

c. Disparities in Access to Opportunity

The Draft must identify and analyze significant disparities in access to opportunity for education, transportation, economic development, and environment at a regional and local level. AFFH Guidance, pg. 34-35. According to the Draft, majority of the City is classified as low to moderate opportunity. Draft, 3-39. However, it does not analyze access to opportunity for education, transportation, economic development, and environment.

d. Disproportionate Housing Needs/Displacement Risk

The Draft acknowledges higher rates of overcrowding and severe overcrowding compared to the County and the State, but does not address it relative to the City's duty to affirmatively further fair housing. Draft, 3-49. The Draft also identifies disability, household income, and household characteristic as "most commonly" shaping the City's housing needs, without further analysis. Draft, 3-47.

3. Review of Fifth Cycle Housing Programs

The housing element must evaluate the effectiveness of the prior Housing Element's programs, including "the actual results or outcomes of the prior housing-element's goals (what happened), objectives, policies, and programs. The results should be quantified where possible (e.g., number of units rehabilitated) and may be qualitative where necessary (e.g., mitigation of governmental constraints)." See HCD Building Blocks, https://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml. The Draft does not properly evaluate all of its housing programs from the fifth cycle. For example, the Draft omits "Program 5.2D – Pursue Annexation of County Islands" from the Fifth Cycle Housing Element, and it does not evaluate the completion of the annexation of the five north Rialto islands. The Draft does not report on its "formal monitoring program" to monitor availability of existing identified sites from Program 5.2A Provide Adequate Sites, nor does it report on its Program 5.4B, Remove development constraints. Draft, A-7, A-16. The Draft should evaluate the Fifth Cycle programs against their stated goals and objectives, and it should analyze whether changes to programs, policies, and practices could increase the City's effectiveness in meeting the community's housing needs.

4. Sixth Cycle Housing Programs

Housing Element law requires that a housing element contain "a statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing." Gov. Code § 65583(b)(1). Each program should set forth "a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, [and] the utilization of appropriate federal and state financing and subsidy programs when available." Gov. Code § 65583(c). The Draft does not provide adequate programs to address the lower income housing needs during the sixth cycle planning period.

The Draft includes timeframes for the implementation of the following programs as "ongoing", rather than providing concrete timeframes which would promote the development of lower income housing. Program 2B: Accessory Dwelling Unit Construction, Program 4A: Density Bonus 4C: Water and Sewer Service Providers, and Program 5A: Affirmatively Furthering Fair Housing. Draft, 4-7, 4-14 to 4-16. Additionally, the Draft's housing program 1F: Targeted Neighborhood Approach, which addresses "problem neighborhoods" including "distressed, poorly managed multi-family properties", will be "initiate[d] during the planning period". Draft, 4-5. These timeframes demonstrate a lack of commitment to implement their housing programs.

Moreover, housing programs 2A: Provide Adequate Sites to Accommodate the RHNA and 2L: Alternative Housing Concepts are too vague. Program 2A provides that "to facilitate development of affordable housing to accommodate the 2021-2029 RHNA as identified in Appendix A of this Housing Element, the City has identified approximately 289.10 acres of underutilized and vacant residential land within the City. The identified land inventory allows a range of residential densities ranging from 25 to 48 dwelling units per acre. To demonstrate adequate sites, the City has provided an analysis of recent development within the City and realistic development capacity of identified sites as detailed in Section 4 of this Housing Element." Draft, 4-6. Because the Draft relies heavily on rezoning programs with different conditions for different opportunity areas to meet the lower income RHNA, the Draft must be revised to include specific rezoning programs with specific dates within the current planning period. Otherwise, the program is inadequate.

Program 2L is also too vague because it states that "to provide more potential housing opportunities in Rialto, the City will review and research alternative housing concepts such as live-work developments, small lot developments, two master-bedroom housing units, and co-op housing. The City will review the applicability of these housing types in Rialto and review and revise the Zoning Code, as appropriate, to encourage development." Draft, 4-10 to 4-11. The

Draft must include a separate program to facilitate the consolidation of small lots because it relies on parcels smaller than half an acre in areas such as Central Area Specific Plan and Baseline Parcels. Therefore, the programs included in the Draft are inadequate to address the lower income housing needs during the sixth cycle planning period.

Conclusion

The City's housing element must include adequate rezoning program to rely on the proposed identified opportunity areas, analyze the sites to ensure that development will affirmatively further fair housing, and demonstrate a commitment to implement housing programs that will encourage and facilitate development of housing that meets the needs of all economic segments of the community.

Thank you for considering these comments. We look forward to discussing our comments with you. Should you have any questions, please contact me via email at mdelgado@icls.org or by phone at (951) 320-7515.

Sincerely,

INLAND COUNTIES LEGAL SERVICES

Maria Delgado, Esq.

INLAND COUNTIES LEGAL SERVICES

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SENT VIA EMAIL ONLY TO cityclerk@rialtoca.gov

October 12, 2021

Mayor Deborah Robertson
City of Rialto, City Council
150 S. Palm Avenue
Rialto, CA 92376

Re: October 12, 2021, City Council Agenda TAB 5
Request to approve submittal of the Draft 6th Cycle Housing Element (2021-2029) to the California Department of Housing and Community Development

Dear Mayor Robertson and members of the City Council,

Inland Counties Legal Services (ICLS) writes to provide comments on the City's Draft Sixth Cycle Housing Element, proposed for submittal to the California Department of Housing and Community Development at tonight's City Council meeting. We previously provided comments to the City regarding substantive deficiencies in the City's Draft Sixth Cycle Housing Element by letter of September 28, 2021. A copy of our September 28 letter is attached for ease of reference as Exhibit 1. We have not heard from the City about any revisions to the Draft Sixth Cycle Housing Element to address the deficiencies in our letter.

We provide these comments to urge the City to correct the deficiencies in the City's Draft Sixth Cycle Housing Element, submit the Draft Sixth Cycle Housing Element to the California Department of Housing and Community Development, and adopt a Sixth Cycle Housing Element that substantially complies with Housing Element Law.

Sincerely,

INLAND COUNTIES LEGAL SERVICES—ONTARIO

Maria Delgado

CC: Siri Champion, Community Development Department
California Department of Housing and Community Development

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EXHIBIT 1

INLAND COUNTIES LEGAL SERVICES

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SENT VIA EMAIL ONLY TO planning@rialtoca.gov; schampion@rialtoca.gov

September 28, 2021

Planning Commission, City of Rialto
Siri Champion, Community Development Department
150 S. Palm Avenue
Rialto, CA 92376

Re: City of Rialto's Draft 6th Cycle Housing Element (2021-2029)

Dear Planning Commission and Ms. Champion,

Inland Counties Legal Services (ICLS) writes to provide comments regarding the City of Rialto's Draft Sixth Cycle Housing Element, dated August 2021 (Draft). While we are pleased that the City has prepared a Draft and is moving toward adoption of its Sixth Cycle Housing Element, we have identified multiple substantive deficiencies in the Draft, described below. We provide these comments to the City to encourage the City's correction of these deficiencies before adopting the Draft. We also encourage the City to submit its draft housing element to the California Department of Housing and Community Development (HCD) for review prior to adoption of the Draft. ICLS previously commented by email of September 1, 2021, that the City's plan to adopt the Draft before submitting it to HCD is in violation of Government Code section 65585(b)(1).

1. Sites Inventory Analysis

The inventory of sites available for housing development does not satisfy the requirements of Housing Element law. "The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower-income housing, moderate-income housing, or above moderate-income housing." Gov. Code § 65583.2(c). The Draft does not identify adequate sites with a realistic capacity to accommodate the lower income Regional Housing Needs allocation (RHNA) during the current planning period consistent with its duty to affirmatively further fair housing.

a. Realistic Capacity

For all sites identified, the housing element must describe the methodology used to determine the number of units calculated based on following factors: (1) land use controls and site improvements requirements, (2) realistic development

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capacity for the site, (3) typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, (4) the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. Government Code section 65583.2(c)(2); see also Housing Element Sites Inventory Guidebook (June 10, 2020), 19. The realistic capacity calculation must be adjusted to reflect capacity limits, especially when the site has a potential to be developed with nonresidential uses or has an overlay zone. Housing Element Sites Inventory Guidebook, 20. The Draft relies on six opportunity areas, described below, which require rezoning programs or overlay zoning to allow residential development.

Foothill Boulevard Specific Plan. According to Table B-1: Summary of RHNA Status and Sites Inventory in Appendix B, Inventory of Adequate Sites, the Draft relies on 1,472 low income and very-low income units within the Foothill Boulevard Specific Plan with the existing zoning. Draft, B-3. The current zoning allows for 30 dwelling units per acre when developing on at least three acres. Draft, B-15. According to Table B-1: Summary of RHNA Status and Sites Inventory, the Draft also relies on 1,624 units within the Foothill Boulevard Specific Plan with an rezone/upzone programs. While the Draft mentions that an amendment to 35 dwelling units per acre "would create the opportunity for 2,532 very low-/low-income housing units" in Appendix B, Inventory of Adequate Sites, the programs included in the Draft do not include any specific action to rezone/upzone the Foothill Boulevard area. Draft, B-15. Without a specific program that includes concrete steps to make sites available for lower income households, the City cannot rely on the additional 1,624 units in the Foothill Boulevard Specific Plan.

North Riverside Avenue. According to Table B-1: Summary of RHNA Status and Sites Inventory, the Draft relies on 1 low income or very-low income unit in North Riverside Avenue with existing commercial zoning, and 219 low income and very-low income units with rezone/upzone programs, a total of 220 units. Draft, B-3. However, on page B-17 of the Appendix B, Inventory of Adequate Sites, the Draft states that this opportunity area "has potential to accommodate 399 housing units, including 179 housing units affordable to very low-/low-income households. This would require the creation of an overlay . . . to allow residential development at a maximum density of 48.4 dwelling units per acre and an assumed density of 39 dwelling units per acre". Draft, B-17. But the programs included in the Draft do not include any specific action for an overlay with a specific timeframe for completion. Without a program to adopt an overlay zone to make sites available for lower income households, the City cannot rely on the 219 units for low income and very-low income households.

Gateway Specific Plan. The Draft relies on 734 low income and very-low income units in the Gateway Specific Plan. However, the current zoning in the Gateway Specific Plan allows for office, industrial parks, and commercial use only. Draft, B-19. The Draft acknowledges that this opportunity area would require a change to the zoning on the parcels, but it does not include a specific rezoning program. Without a rezoning program including concrete steps and timeframes, the City cannot rely on the 734 lower income household units in the Gateway Specific Plan.

Central Area Specific Plan. Sites smaller than one half acre may only count toward lower income units when the Draft demonstrates "that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income household units" or other evidence that demonstrates the sites are adequate to accommodate lower income units. Gov. Code Section 65583.2(c)(2)(A). The Draft relies on the Central Area Specific Plan to accommodate 255 lower income units, only 15 units of which could be accommodated with the existing zoning, according to Table B-1: Summary of RHNA Status and Sites Inventory. Draft, B-3. The Draft acknowledges that an overlay district is required to accommodate more lower income units, including 255 lower income household units; however, the programs in the Draft do not include a specific program with overlay requirements. Moreover, the Draft relies on 58 sites that are smaller than one half acre within the Central Area Specific Plan. Draft, B-21. The Draft does not include the analysis required under Government Code Section 65583.2(c)(2)(A) for sites smaller than one half acre.

Baseline Parcels and Baseline Shopping Center. Finally, the Draft is also relying on rezone programs in Baseline Parcels and a Baseline Shopping Center to accommodate lower income household units. Most of the parcels in Baseline Parcels are less than one half acre. However, the Draft does not include a program to facilitate the consolidation of small lots in the Baseline Parcels opportunity area, nor does it include a program to rezone commercial zoning in the Baseline Shopping Center. California Department of Housing and Community Development, Housing Element Site Inventory Guidebook (Site Inventory Guidebook), page 16 (available at https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf).

Therefore, the sites inventory does not identify sufficient available sites with the capacity to accommodate the lower income RHNA in the sixth cycle planning period.

b. Infrastructure Availability

The housing element must include an analysis "describing existing or planned water, sewer, and other dry utilities supply, including the availability and access to parcels on the site inventory, distribution facilities, general plan programs or other mandatory program or plan (including a program or plan of a public or private entity to secure water or sewer service) to support housing development on the site." Sites Inventory Guidebook, page 8. The Sites Inventory in Appendix B of the Draft does not provide specific information about infrastructure availability for each identified site. HCD's Sites Inventory Form, now mandatory pursuant to SB 6, requires this analysis be included on a site-specific basis. The Draft mentions infrastructure as a potential constraint because it can increase costs of new construction; however, it does not evaluate the infrastructure availability for the sites identified. The Draft must include an analysis of its infrastructure availability.

c. Affirmatively Furthering Fair Housing

The Draft fails to evaluate adequately the identified sites relative to the City's duty to affirmatively further fair housing required by Government Code section 65583(c)(10)(A). The Draft does not include a discussion of whether or how development the selected sites will integrate the community; nor does it discuss how such development will transform racially and ethnically concentrated areas of poverty into areas of opportunity. See California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance (AFFH Guidance), pg. 21 (available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf); Gov. Code §§ 65583(c)(5). Further analysis is necessary to ensure that development of the identified sites will affirmatively further fair housing.

2. Assessment of Fair Housing

Assembly Bill 686 now requires that housing elements include a robust assessment and analysis of contributing factors to fair housing issues that limit or deny fair housing choice or access to opportunity, including (1) ongoing and concentrated segregation and integration, (2) disparities in access to opportunity, (3) racially concentrated areas of poverty, and (4) disproportionate housing needs and displacement risk. See https://www.hcd.ca.gov/community-development/affh/index.shtml. The Draft needs more analysis of these contributing factors to comply with the requirements of AB 686, as set forth below.

a. Ongoing and Concentrated Segregation and Integration

The analysis must address areas of ongoing and concentrated segregation and integration and compare concentrations of protected characteristics and incomes at both a regional and local level. AFFH Guidance, pg. 31, citing Gov. Code §§ 65583(c)(10). The Draft identifies native Hawaiians as experiencing the highest levels of segregation at 40.6%. Draft, 3-36. However, the Draft does not provide an analysis of the trends and factors contributing to segregation, nor does it include an analysis of ongoing and concentrated segregation and integration at a regional level. The Draft also acknowledges high concentrations of Latinx population based on HCD's AFFH data and mapping resources, but it does not include an analysis of the contributing factors. Draft, 3-57. Moreover, the Draft mentions integration and segregation for race and ethnicity, but there is no discussion of integration and segregation for income, familial status, persons with disabilities.

b. Racially Concentrated Areas of Poverty

The analysis in the Draft must include racially and ethnically concentrated areas of poverty on a regional and a local level, where concentrated areas of poverty are discussed relative to concentrated areas of affluence. AFFH Guidance, pg. 32, citing Gov. Code §§ 65583(c)(10). The

Draft identifies one racially or ethnically concentrated areas of poverty in the City's downtown area, where it partly relies on to accommodate lower income household units. Draft, 3-37. The Draft does not analyze racially and ethnically concentrated areas of poverty at a regional level, nor does it include a discussion of local concentrated areas of poverty relative to concentrated areas of affluence.

c. Disparities in Access to Opportunity

The Draft must identify and analyze significant disparities in access to opportunity for education, transportation, economic development, and environment at a regional and local level. AFFH Guidance, pg. 34-35. According to the Draft, majority of the City is classified as low to moderate opportunity. Draft, 3-39. However, it does not analyze access to opportunity for education, transportation, economic development, and environment.

d. Disproportionate Housing Needs/Displacement Risk

The Draft acknowledges higher rates of overcrowding and severe overcrowding compared to the County and the State, but does not address it relative to the City's duty to affirmatively further fair housing. Draft, 3-49. The Draft also identifies disability, household income, and household characteristic as "most commonly" shaping the City's housing needs, without further analysis. Draft, 3-47.

3. Review of Fifth Cycle Housing Programs

The housing element must evaluate the effectiveness of the prior Housing Element's programs, including "the actual results or outcomes of the prior housing-element's goals (what happened), objectives, policies, and programs. The results should be quantified where possible (e.g., number of units rehabilitated) and may be qualitative where necessary (e.g., mitigation of governmental constraints)." See HCD Building Blocks, https://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml. The Draft does not properly evaluate all of its housing programs from the fifth cycle. For example, the Draft omits "Program 5.2D – Pursue Annexation of County Islands" from the Fifth Cycle Housing Element, and it does not evaluate the completion of the annexation of the five north Rialto islands. The Draft does not report on its "formal monitoring program" to monitor availability of existing identified sites from Program 5.2A Provide Adequate Sites, nor does it report on its Program 5.4B, Remove development constraints. Draft, A-7, A-16. The Draft should evaluate the Fifth Cycle programs against their stated goals and objectives, and it should analyze whether changes to programs, policies, and practices could increase the City's effectiveness in meeting the community's housing needs.

4. Sixth Cycle Housing Programs

Housing Element law requires that a housing element contain "a statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing." Gov. Code § 65583(b)(1). Each program should set forth "a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, [and] the utilization of appropriate federal and state financing and subsidy programs when available." Gov. Code § 65583(c). The Draft does not provide adequate programs to address the lower income housing needs during the sixth cycle planning period.

The Draft includes timeframes for the implementation of the following programs as "ongoing", rather than providing concrete timeframes which would promote the development of lower income housing. Program 2B: Accessory Dwelling Unit Construction, Program 4A: Density Bonus 4C: Water and Sewer Service Providers, and Program 5A: Affirmatively Furthering Fair Housing. Draft, 4-7, 4-14 to 4-16. Additionally, the Draft's housing program 1F: Targeted Neighborhood Approach, which addresses "problem neighborhoods" including "distressed, poorly managed multi-family properties", will be "initiate[d] during the planning period". Draft, 4-5. These timeframes demonstrate a lack of commitment to implement their housing programs.

Moreover, housing programs 2A: Provide Adequate Sites to Accommodate the RHNA and 2L: Alternative Housing Concepts are too vague. Program 2A provides that "to facilitate development of affordable housing to accommodate the 2021-2029 RHNA as identified in Appendix A of this Housing Element, the City has identified approximately 289.10 acres of underutilized and vacant residential land within the City. The identified land inventory allows a range of residential densities ranging from 25 to 48 dwelling units per acre. To demonstrate adequate sites, the City has provided an analysis of recent development within the City and realistic development capacity of identified sites as detailed in Section 4 of this Housing Element." Draft, 4-6. Because the Draft relies heavily on rezoning programs with different conditions for different opportunity areas to meet the lower income RHNA, the Draft must be revised to include specific rezoning programs with specific dates within the current planning period. Otherwise, the program is inadequate.

Program 2L is also too vague because it states that "to provide more potential housing opportunities in Rialto, the City will review and research alternative housing concepts such as live-work developments, small lot developments, two master-bedroom housing units, and co-op housing. The City will review the applicability of these housing types in Rialto and review and revise the Zoning Code, as appropriate, to encourage development." Draft, 4-10 to 4-11. The

Draft must include a separate program to facilitate the consolidation of small lots because it relies on parcels smaller than half an acre in areas such as Central Area Specific Plan and Baseline Parcels. Therefore, the programs included in the Draft are inadequate to address the lower income housing needs during the sixth cycle planning period.

Conclusion

The City's housing element must include adequate rezoning program to rely on the proposed identified opportunity areas, analyze the sites to ensure that development will affirmatively further fair housing, and demonstrate a commitment to implement housing programs that will encourage and facilitate development of housing that meets the needs of all economic segments of the community.

Thank you for considering these comments. We look forward to discussing our comments with you. Should you have any questions, please contact me via email at mdelgado@icls.org or by phone at (951) 320-7515.

Sincerely,

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Maria Delgado, Esq.

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March 8, 2022

Mayor Deborah Robertson
City of Rialto, City Council
150 S. Palm Avenue
Rialto, CA 92376

Re: March 8, 2022, City Council Agenda TAB 2 Item 22-173 Request City Council to Conduct a Public Hearing to Adopt Resolution No.7845 Adopting a Mitigated Negative Declaration (Environmental Assessment Review No. 2021-0044) for and Approving the City of Rialto 2021-2029 (Sixth Cycle) General Plan Housing Element Update.

Dear Mayor Robertson and members of the City Council,

Inland Counties Legal Services (ICLS) and the Public Interest Law Project (PILP) write to provide comments on the City's Draft Sixth Cycle Housing Element (Current Draft), proposed for adoption at the March 8, 2022 City Council meeting. The City submitted its Draft Sixth Cycle Housing Element to the Department of Housing and Community Development (HCD) for review on October 14, 2021. On December 13, 2021, HCD found that the City's Draft Sixth Cycle Housing Element did not substantially comply with Housing Element Law. HCD's December 13, 2021, findings letter (HCD's findings) is attached as Exhibit 1. HCD's findings identified multiple substantial deficiencies in the City's Draft Sixth Cycle Housing Element. PILP and ICLS raised many of these deficiencies in our earlier comments of November 19, 2021 and September 28, 2021. We now provide comments on the City's February 2, 2022 revisions to the Draft Sixth Cycle Housing Element in response to HCD's findings.

1. **The Current Draft does not provide an adequate fair housing analysis.**

The Current Draft fails to include data and analysis relevant to fair housing issues, including integration and segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity for education and economic development, and disproportionate housing needs and displacement.

Integration and Segregation. As discussed in HCD's findings, and in our prior comment letters, the Current Draft is missing data and analysis about ongoing segregation and integration. HCD's Findings, p. 2. In response to HCD's findings, the Current Draft includes local and regional maps to compare racial demographics in 2010 and in 2018 generally, and it concludes that the City and the region have experienced racial diversification. Draft, p. 3-48 to 3-50.

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The Current Draft identifies Native Hawaiian and "Other" with the highest level of segregation, without further discussion, and it does not address the high concentration of Latinx populations (74.3 %) within the City. Draft, p.3-51. Further, the Current Draft must also include a discussion of levels of integration and segregation for income, familial status, persons with disabilities, and identify the groups that experience the highest levels of segregation. See California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance (AFFH Guidance), pg. 31 (available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf).

Racially & Ethnically Concentrated Areas of Poverty (R/ECAP). HCD's findings instruct the City to analyze the trends and patterns in addition to local data and knowledge and factors that contributed to the conditions of the two tracts within the City that have been designated by TCAC as areas of high segregation and poverty. HCD's findings, p. 2; See HCD AFFH Data Viewer https://affh-data-resources-cahcd.hub.arcgis.com/. In response, the Current Draft added local data and knowledge[1], but does not include trends and patterns, nor does it evaluate factors that contributed to the conditions of these areas. Draft, p. 3-51 to 3-52, 3-64.

Disparities in Access to Opportunities. HCD's findings instruct the City to independently analyze trends and patterns related to access to educational and economic opportunities at a local and regional level. HCD's Findings, p. 2. The Current Draft now includes a map showing access to educational opportunities at a local and regional level and a map showing access to economic opportunities at a local and regional level. Draft, p. 3-65 to 3-67. For access to educational opportunities, the Current Draft fails to describe differences amongst schools, analyze proximity of proficient and less proficient schools to areas of high segregation and poverty, and evaluate the presence or lack of policies, practices, investments to promote access to more proficient schools that affect access to opportunity. See AFFH Guidance, p. 34-35. For economic opportunities, the Current Draft fails to describe any disparities in access to jobs by protected groups, it fails to address where protected groups live and how that affects their ability to obtain a job; and evaluate employment trends by protected groups. See AFFH Guidance, p. 35.

Disproportionate Housing Needs and Displacement. HCD's findings instructed the City to consider and analyze more data for displacement risk, including trends and patterns related to people experiencing homelessness at a local and regional level. HCD's findings, p. 2. The City added UC Berkeley's Urban Displacement Project data, which shows low-income/susceptible to displacement areas where the City has identified sites to accommodate the lower-income RHNA. Draft, p. 3-81 to 3-83. Additionally, in Section 2.F.7., the Current Drafts identifies resources for people experiencing homelessness at a local and regional level, but it does not provide an analysis of trends and patterns.

---

[1] The Current Draft continues to provide inconsistent information about high segregation and poverty. The Current Draft states that there are no R/ECAPs located within Rialto; therefore, no proposed sites are located in a R/ECAP. Current Draft, p. 3-97.

Contributing Factors. HCD's letter indicates that the Current Draft does not provide a conclusion of fair housing issues and it does not identify, describe, and prioritize contributing factors to fair housing issues. HCD's findings, p. 3; See AFFH Guidance, p. 49. In response, the Current Draft adds the two high segregation census tracts and two other factors, but as indicated in HCD's findings the low resourced census tracts are not contributing factors. HCD's finding, p. 3.

Site inventory's consistency with the obligation to affirmatively furthering fair housing. HCD's findings points out that the City's analysis clearly demonstrates that the sites identified to accommodate the lower income RHNA will either maintain the status quo or further worsen of fair housing conditions, which requires strong reasoning and "commensurate programs with strong place-based strategies for community revitalization and new opportunities in higher opportunity areas to result in an equitable qualify of life." HCD's Findings, p. 2-3. The Current Draft, as revised, does not provide a strong reasoning for identifying lower income RHNA sites in low resource areas with high segregation and poverty and with the highest percentage of Latinx population. It states only that the sites provide access to transportation and services and "the City seeks to revitalize the area and facilitate the development of mixed income residential projects in conjunction with new community opportunities." Draft, p. 3-91, 3-93, 3-95. Moreover, the additions to Program 5A do not adequately address strong place-based strategies for community revitalization, nor do they provide new opportunities in higher opportunity areas. The Current Draft's evaluates the RHNA sites as identified "throughout the City"; however, it does not evaluate whether the RHNA by income or race is concentrated in areas of the community. Draft, s. 3-53, 3-65, 3-81. As such, the Current Draft does not explain how development within the identified sites will transform racially and ethnically concentrated areas of poverty into areas of opportunity. See AFFH Guidance, p. 21, 45. Accordingly, the Current Draft continues to fail to adequately evaluate the identified sites relative to the City's duty to affirmatively further fair housing required by Government Code sections 65583(c)(10)(A) and 65583.2(a).

2. The Current Draft does not identify adequate sites to accommodate the City's Sixth Cycle RHNA.

Realistic Capacity. HCD's December 13, 2021 findings regarding the City's prior draft determined that the inventory of sites did not reflect the realistic capacity of the sites because the buildable and gross acreage are the same, such that the Element assumes that sites will be developed at the maximum allowable density. HCD findings, p. 4. The Current Draft now addresses the realistic capacity of sites directly, but continues to assume the certain "Opportunity Areas" will continue to "include a redevelopment percentage of 100%" based on recent projects that were developed. Draft, B-35. However, of the examples included in Table B-16, 12 of 13 projects were in the city of Fontana, not Rialto. Also, the examples are primarily affordable projects that would qualify for a density bonus, which is not an acceptable methodology to estimate capacity. See HCD Site Inventory Guidebook, p. 14. The single affordable project developed in the City of Rialto at the Metrolink Station was zoned "Rialto Central Area Specific Plan – Commercial Support" which is not defined in terms of the either the minimum or

maximum density allowed, nor the assumed density, so that there is no information about the realistic capacity compared to actual development for any development in the City.

The sites inventory continues to list the gross acreage and buildable acreage as the same values for all 7 out of 8 planning areas, comprising 308 of 313 sites, including all of the sites in the Foothill Boulevard Specific Plan area, the Gateway Specific Plan Area, the Central Area Specific Plan, the Baseline areas, Randall Avenue sites, Lytle Creek Specific Plan and Renaissance Specific Plan. For the single North Riverside Avenue area the Current Draft makes reductions only on five properties with existing uses, where development is proposed to be feasible for areas such as parking lots, sites 113-115, 117-118. This does not reflect a realistic capacity for the overwhelming majority of sites in the inventory. The revised Current Draft does not remedy HCD's findings regarding realistic capacity of the sites.

Zoning and Minimum Densities. The Current Draft does not include information on the current zoning of many parcels included in the sites inventory, labeling most sites with zoning for one of several "Specific Plans" that does not provide for what uses are currently allowed. For example, this is the case for all 111 sites in the Foothill Boulevard Specific Plan area, both the land use designation and zoning are listed as "Specific Plan" despite the fact that there are four separate land use designations listed at p. 2 of the Foothill Specific Plan, available at the City's website: https://www.yourrialto.com/DocumentCenter/View/564/Foothill-Boulevard-Specific-Plan. The Specific Plan land use designations should be included in the inventory so that it describes the existing permitted uses. Also, the sites inventory should distinguish between sites that are relied upon for their existing zoning capacity and sites that are subject to rezoning, rather than only inferring the intent to rezone from the varied densities in the rezone/upzone column in the inventory.

The Current Draft does not commit to minimum densities in the sites inventory. The narrative for Gateway Specific Plan and the Baseline plan area suggest they might have a "a zone that could have a minimum density of 20 du/ac" but does not commit to any minimum density. Draft p. B-24, B-28. The Foothill Specific Plan discussion does not review or commit to any minimum densities, despite being the area where the Current Draft proposes to accommodate over 3,000 lower income dwelling units. Draft, B-20. Without a commitment to minimum densities, the Current Draft must engage in "an evaluation of the typical densities of existing or approved residential development at a similar affordability level" pursuant to Gov. Code § 65583.2(c)(2). See Sites Inventory Guidebook, 19. However, this analysis is also missing. For example, the description of the Lytle Creek Specific Plan does include an average density for existing development of 3.44 units per acre, but this figure was not employed when estimating the realistic capacity of the sites. See Draft, Table B-2, p. B-10 (this page is mis-labeled as C-10).

Excessive Non-Vacant Sites. The Current Draft relies on non-vacant sites to satisfy more than 50 percent of its lower income RHNA, thus requiring additional justification and analysis for such reliance, pursuant to AB 1397, at Gov Code Sec 65583.2(g)(2). Draft, p. 3-105. The Element now addresses non-vacant sites in a summary fashion at p. B-17, but does not provide "findings based on substantial evidence that the use is likely to be discontinued during the planning period" as required by the statute.

For example, Site 26 in the Foothill Specific Plan Area is a 4.05 acre parcel that is the location of the San Bernardino County Social Service office, for which the Current Draft assumes will be developed for 78 units of very low/low housing, yet there is no indication the County will be closing or moving its Social Services office. Without evidence that such uses will be discontinued during the planning period, all such sites must be removed.

The review of non-vacant sites also includes a list of projects that were developed for residential uses on non-vacant sites, Table B-7, yet all of these projects appear to be in the City of Fontana. See Draft, p. B-18. No explanation is offered why the same conditions exist in Rialto as the Fontana developments, nor is there an explanation why no housing developments on non-vacant sites have occurred in Rialto. Indeed, the fact that the Draft can point to eight development on non-vacant parcels occurred in the "region" yet none occurred in Rialto, seems to indicate that conditions are not feasible for non-vacant development in the City.

Program 2F acknowledges that 19 non-vacant sites in the inventory were also relied upon in the 5th Cycle, so that the City must permit development at 30 units per acre and allow residential use by right for housing development when at least 20 percent of the proposed units are affordable to lower income households. Draft, p. 4-9. There are a number of parcels included in the inventory for the 5th Cycle that have parking lots that are in active use that are not analyzed for the City's parking requirements, Rialto Municipal Code Chapter 18.58. Examples of such sites are for County Social Services office and the U.S. Post Office, sites 95 and 133. Furthermore, Program 2F proposes completing the required rezone within 3 years of adoption of the Housing Element, but since Rialto has not adopted its Element until more than 120 days after the October 15, 2021 deadline, the programs to rezone sites must be completed within 1 year of the statutory deadline, or no later than October 15, 2022. Gov. Code § 65583(c)(1)(A).

As required for non-vacant sites, the Current Draft now has Program 2C to provide for replacement housing, as required by § 65583.2(g)(3), however this program lacks specificity for implementation and delays its application for 3 years. Draft, p. 4-8.

By-Right Zoning for Multifamily Housing. The Current Draft now acknowledges the City's obligation to allow multifamily use by right on sufficient sites to meet its lower income RHNA, however, the language added to Program 2B merely recites the language of Gov. Code § 65583.2(h) and (i) without any effort to apply these standards to the Specific Plan areas that are relied upon to meet the lower income RHNA. Draft, p. 4-8.

For example, in Foothill Specific Plan area includes three designations that all permit 13-30 du/ac, yet there are different minimum development sizes, the Commercial Mixed-Use areas require a 3 acre minimum, the Residential Mixed Use has unspecified minimum parcel sizes consistent with design requirements and Residential High Density has both a 3 acre minimum that must also be consistent with design standards. Foothill Specific Plan, 22-24. The Commercial Mixed-Use areas only permit residential multifamily development above the first floor. Foothill Specific Plan, 29, 35. The review process for all types of development does not allow any process of "by right" development, instead focusing on the obligation to have a "precise plan" developed by the applicant reviewed by the City prior to any development permits. Foothill Specific plan, 27, section 18.111.040.

The Current Draft does not propose how to harmonize these planning restrictions in the Foothill Specific Plan with the requirements of Housing Element Law to permit multifamily development by right in such zones. Merely reciting the requirements of the statute is insufficient to plan how the City will comply with the law.

City Owned Sites. In our prior comments from November 19, 2021, we noted that the earlier draft did not provide information about the City's intention to sell City owned sites included in the inventory. The Current Draft does not correct this deficiency. Housing Element Law requires that the City provide this information: "if a site included in the inventory is owned by the city or county, the housing element must include a description of whether there are any plans to sell the property during the planning period and how the jurisdiction will comply with the Surplus Land Act." Gov. Code § 65583.2(b)(3) (added by AB 1486 (2019)). While the Current Draft does now include a new program to comply with the Surplus Land Act, Program 2S, it does not include any information on the City's intention to dispose of the City owned sites.

It is critical to understand the City's intention with respect to the parcels it owns. For example, a series of small sites near City Hall in the Central Area Specific Plan area are controlled by the City, and would affect development near the center of City operations. See Draft Figure B-9, p. B-27, and sites 124, 129, 147, 149, 161 through 179, and182 through 191. (Note that the Draft does not include sites as "City owned" in the inventory when the entity holding the property is the former Redevelopment Agency of the Rialto, despite the fact that City is the Successor Agency, and thus controls these parcels, see https://www.yourrialto.com/279/Successor-Agency.) Residential development will not be possible on these sites unless the City makes the determinations agrees to dispose of the properties. The new Program 2S, to comply with the Surplus Land Act, does not commit the City to make the required determination under the SLA whether the properties are excess surplus, such that they would be make available to developers of lower income housing.

All but two of the 31 sites owned by the City in the Central Area Specific Plan area are less than ½ acre, requiring a consolidation program in order to make multifamily housing feasible, and now required to make additional showing of prior history of small site development or that they can be developed. Gov. Code § 65583.2(c)(2)(A), as amended by AB 1397 (2017). The Current Draft now has two lot consolidation programs that addresses such small sites, Programs 2O and 2P, yet neither of these programs commits the City to consolidating the lots it owns, rather "encourage and incentivize developers to consolidate these parcels". Draft, p. 4-13. The City acknowledges it has "total site control to consolidate" the parcels it owns, yet fails to make any commitment to either consolidate small sites nor make them available for housing development. See p. B-15 on Smaller Sites Parcels (this page is mis-labeled C-15). As the owner of the parcels, the City should consolidate the lots and make them available for housing development as Surplus Land.

Specific Plans. HCD's findings instruct the City to indicate whether projects in the Specific Plans have been approved or pending, and if not, to list the sites by parcel number size, general plan designation, zoning and include a calculation of the realistic capacity of each site. HCD's findings, p. 5. The Current Draft lists three criteria for review and approval of proposed developments and financing information for Specific Plans. Current Draft, p. B-6. The Current

Draft indicates that it has received one Precise Plan of Design application without further information. Current Draft, p. B-7.

Foothill Boulevard Specific Plan. The Current Draft continues to rely greatly on sites within the Foothill Boulevard Specific Plan, including 1,442 low income and very-low income units with the current zoning, and an additional 1,603 low income and very-low income units after rezoning. Draft, p. B-3; Table B-1. The Current Draft does not mention any pending or approved projects in the Foothill Boulevard Specific Plan. As such, HCD's findings instruct the City to list sites by parcel number, size, general plan designation, zoning and include a calculation of realistic capacity of each site. HCD's findings, p. 5. As mentioned above, the sites inventory in Appendix B of the Current Draft does not include the required information, including land use designation and zoning, and the calculation of realistic capacity is inadequate. Moreover, the Current Draft does not include an analysis of any requirements such as phasing or timing requirements in the Foothill Boulevard Specific Plan that impact development in the planning period, as mentioned in HCD's findings. HCD's findings, p. 5.

Central Area Specific Plan. The Current Draft relies on the Central Area Specific Plan to accommodate 240 lower income units after rezoning, and 15 lower income units with the existing zoning, according to Table B-1. Draft, p. B-3.[2] The Current Draft suggests that "the creation of a new overlay district" or "similar policy strategy" could permit up to 48 dwelling units per acre in the Central Area Specific Plan area. Draft, p. B-26. This appears to coincide with the 48 du/ac proposed in Program B2, yet there is no language in the Program describing an any overlay zone, nor the scope and terms of an overlay zone. The Current Draft should be revised to clarify what rezoning will take place, which parcels would be rezoned, and whether such rezoning will be in an overlay district or utilize existing or modified zoning designations.

The inventory of sites in the Central Area Specific Plan area include 60 of 67 sites that are smaller than ½ acre, but nonetheless are included in the inventory of sites as accommodating lower income RHNA. Draft p. B-64 to B-75. AB 1397 prohibits including such small sites for meeting lower income RHNA "unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." HCD Sites Inventory Guidebook, p. 15. While Programs 2O and 2P identify some measures the City "will evaluate the appropriateness" of taking to incentivize consolidation, the commitments to such measures are too vague to result in the level of consolidation needed to make development realistic. Draft, p. 4-13.

[2] The Central Area Specific Plan narrative on page B-26 and Table B-12 continue to provide inconsistent information about the number of lower income units relied upon in the Central Area Specific Plan (255 instead of 240 lower income units).

Furthermore, the City or the former Redevelopment Agency owns 31 sites in the Central Area Specific Plan, all but two of which are less than ½ acre. See above for comments on the City Owned sites.

Gateway Specific Plan. Th Current Draft relies on 384 low income and very-low income units in the Gateway Specific Plan after rezoning two sites, sites 120 (9.86 acres) and 121 (10.08). Draft, B-3, p. B-64. However, the Current Draft does not provide evidence that site 121, which the Current Draft identifies as a large site because it is over 10 acres, is realistic and feasible for lower income housing. Draft, p. B15 (mis-labeled as p. C-15).

Baseline Parcels and Baseline Shopping Center. The Current Draft is also relying on 80 lower income units within the Baseline Parcels area and 464 lower income units within the Baseline Shopping Center area after rezoning. Draft, p. B-3. However, as mentioned above in the Zoning and Minimum Densities section, the Current Draft does not specify the proposed new zoning, nor does it specify any modification to the general plan designation. More importantly, listing the gross acreage and buildable acreage as the same values within the Baseline Shopping Center is not realistic capacity. For example, sites 208, 211, 216, 220, 222, 226, and 227 all list the gross acreage and buildable acreage as the same where the City intends to use only a "significant portion of the parking lot" to accommodate lower income units. Draft, p. B-78 to B-85.

North Riverside Avenue. The Current Draft relies on 220 low income and very-low income units in North Riverside Avenue after rezoning. Draft, p. B-3. As mentioned in our prior comments, the rezoning program included in the Current Draft, Program 2B, is inadequate because it fails to specify the proposed general plan designation and minimum densities allowed. Draft, p. 4-7 to 4-8.

Randall Avenue Sites. The Current Draft relies on 65 lower income units within Randall Avenue Sites after rezoning. Draft, p. B-3. Program 2B is inadequate because it fails to specify the proposed new zoning for the Randall Avenue Sites. Moreover, four out of the six sites identified sites in Randall Avenue are smaller than .5 acres. Draft, p. B-88 to B-89. While Program 2P indicates that the City will adopt provisions in its Zoning Code to facilitate small lot consolidation, it does not specify the provisions and a discrete timeline. Draft, p. 4-13.

3. The Current Draft does not include infrastructure availability for the sites inventory.

The City continues to fail its statutory obligation to include HCD's Sites Inventory Form in the Current Draft, which would include information about infrastructure availability with the current zoning for each identified site.

4. The Current Draft does not address the constraints on Housing for Persons with Disabilities.

As HCD's findings noted, the Current Draft does not adequately analyze constraints on development of housing for people with disabilities. HCD's findings, p. 7. In response to HCD's

findings, the Current Draft added language to Program 5F purporting to commit to review its reasonable accommodations findings to identify any potential constraints to persons seeking accessible housing. Draft, p. 4-25. However, this does not correct the deficiency. The City must analyze reasonable accommodation findings and process and revise programs to address this constraint. HCD's findings, p. 7. Moreover, the Current Draft does not address the requirement to describe and analyze any definition of family used in zoning and land use. HCD's findings, p. 7.

5. Public Participation

Prior to adoption of the Housing Element, planning staff must provide all public comments from the public on the adoption of the Element to the City Council. § 65585(b)(2). While the Current Draft acknowledges this obligation, and includes hundreds of pages of surveys, presentations and other letters in Appendix C, the letters provided by Inland Counties Legal Services on October 12, 2021 and November 19, 2021 are not included. Draft, p. 1-9. Further, these letters are not attached as exhibits to the agenda item for today's City Council meeting.

Conclusion

We provide these comments to urge the City to correct the remaining deficiencies in the City's Draft Sixth Cycle Housing Element before adopting and submitting to HCD, and adopt a Sixth Cycle Housing Element that substantially complies with Housing Element Law.

Sincerely,

Maria T. Delgado
INLAND COUNTIES LEGAL SERVICES, INC.

Craig Castellanet
PUBLIC INTEREST LAW PROJECT

CC: Sohab Mehmood (Sohab.Mehmood@hcd.ca.gov), Paul McDougall (Paul.McDougall@hcd.ca.gov)
California Department of Housing and Community Development

Siri Champion (schampion@rialtoca.gov),
City of Rialto, Community Development Planning Division

EXHIBIT 1

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
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December 13, 2021

Daniel Casey, Acting Community Development Manager
Community Development Department
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

Dear Daniel Casey:

RE: City of Rialto's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Rialto's (City) draft housing element received for review on October 14, 202. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. HCD considered comments from Inland Counties Legal Services pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-

income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Sohab Mehmood, of our staff, at Sohab.mehmood@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF RIALTO

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at http://www.hcd.ca.gov/community-development/building-blocks/index.shtml and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element must provide a cumulative evaluation of the effectiveness of past 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).

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Enforcement: While the element briefly describes fair housing services with Inland Fair Housing and Mediation Board (IFHMB), it generally does not address this requirement. The element must include information on past or current fair housing complaints, findings, lawsuits, or judgements related to enforcement actions regarding fair housing. In addition, the element must discuss compliance with existing fair housing laws and regulations. For more information and guidance on this analysis, please visit pg. 28-30 of the HCD's AFFH guidance memo: https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

   Local Knowledge and Data: The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates, public comments, and service providers.

Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

Integration and Segregation: The element provided some data on integration and segregation across racial groups and one map displaying income by census tracts. The element must discuss and analyze this data for trends over time and patterns across census tracts. Additionally, it must evaluate patterns at a regional basis, comparing the City to the region.

High Segregation and Poverty: TCAC/HCD opportunity maps indicate that the City has two areas considered high segregation and poverty in the center of the City. The element must analyze all of these census tracts for trends and patterns and consider other relevant factors, local data and knowledge and evaluate factors that contributed to the conditions of these areas.

Access to Opportunity: While the element provided a general analysis of opportunity areas, and high-level conclusions about the City's disparities in access to opportunity, it must independently analyze trends and patterns related to access to educational and economic opportunities. Additionally, the element must evaluate patterns at a regional basis and compare those to conditions at the local level.

Disproportionate Housing Needs and Displacement: The element must provide an analysis of trends and patterns related to people experiencing homelessness at a local and regional level. The element deferred to an at-risk analysis of affordable housing as a way to analyze displacement risk. The element should consider and analyze additional data. For example, UC Berkeley's Urban Displacement Project indicates that there are several census tracts in the middle of the City with people vulnerable to displacement.

Sites Inventory: The element concludes that the sites inventory does not exacerbate existing fair housing conditions, however the analysis clearly demonstrates that the sites will either maintain the status quo of fair housing conditions or further worsen areas already experiencing several fair housing issues including income and racial segregation and limited access to opportunities. For example:

- *Race* – Figure 3-16 of the element illustrates that all of the City's lower-income RHNA has been identified in areas with the highest percentages of Hispanic population, while no lower-income sites and majority moderate and above moderate sites have been identified in census tracts with the lowest Hispanic population.
- *Income* – Figure 3-18 illustrates that majority of the above and moderate RHNA sites are identified in areas with the least percentage of low to moderate income households while no lower-income sites are identified in these census tracts.
- *Access to Opportunity* – Figure 3-21 displays that no lower-income units were identified in the City's high resourced census tracts while all lower-income

sites were identified in most of the City's low resourced areas and areas of high segregation and poverty.

The element must include further analysis, strong reasoning, and accurate conclusions about the location of sites and its impact on current fair housing conditions (e.g., isolating lower-income sites in low resourced areas and moderate to above moderate in high resourced, high income areas). Further, if the inventory continues to isolate the RHNA for lower income households in central areas, the element must have commensurate programs with strong place-based strategies for community revitalization and new opportunities in higher opportunity areas (beyond RHNA) to result in an equitable quality of life and affirmatively further fair housing (AFFH) throughout the City.

Fair Housing Issues and Contributing Factors: The element did not provide a conclusion of fair housing issues. The element should list and identify fair housing issues as a result of the analysis. Additionally, the element did not sufficiently identify, describe, and prioritize contributing factors. For example, the element listed R/ECAP, low resourced census tracts, and the City's availability to meet their RHNA as contributing factors, however, these are not contributing factors. For more information and guidance, please visit pages 49-56 of HCD's AFFH Guidance Memo: https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

Goals, Actions, Metrics and Milestones: The element identified few actions to address AFFH including continuing to work with the Inland Fair Housing Board and reviewing historic policies. These actions do not include specific commitments, address fair housing issues, and meaningfully overcome contributing factors. At minimum, programs must enhance housing mobility, provide new housing choices and affordability in high opportunity areas, and place-based strategies for community preservation and revitalization. Additionally, programs and actions must create meaningful impact in addressing a jurisdiction's fair housing issues. Furthermore, the element must include metrics and milestones for targeting meaningful change and evaluating progress on programs, actions, and fair housing results. For more information and guidance, please visit pages 72-74 of HCD's AFFH Guidance Memo: https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

   Housing Stock Conditions: While the element identifies the age of the housing stock (p. 2-28), it must quantify the number of units in need of major rehabilitation and replacement. For example, the analysis could include 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.

3. *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).)*

   The City has a RHNA of 8,272 housing units, of which, 3,424 are for lower-income households. To address this need, the element relies on vacant and nonvacant sites, including sites in Specific Plan Areas and within the Mixed-Use Overlay area, ADUs, and pipeline projects. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

   Realistic Capacity: The element states that the City is assuming 50-80 percent of the maximum allowable density, however the inventory indicates that for sites where the buildable and gross acreage is the same (e.g., no deductions on site acreage for constraints), the element assumed that units will be developed at the maximum allowable density. The element must demonstrate specific trends, factors, and other evidence led to the assumptions or adjust assumptions as appropriate. Additionally, the estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level. Lastly, the element identifies sites within commercial and mixed-use zones where the current zoning allows for 100 percent nonresidential uses (commercial, industrial, etc.,). To demonstrate realistic capacity on these sites, the element must analyze and account for the likelihood of residential development in the zones that allow 100 percent nonresidential uses. The analysis should be based on factors such as development trends, performance standards or other relevant factors.

   Suitability of Nonvacant Sites: The element identifies nonvacant sites to accommodate a portion of the regional housing need for households of all incomes. While the element includes general statements such as "developer interest" and sites are "underutilized," this alone is not adequate to demonstrate the suitability of these sites. A complete analysis should describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment.

   In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period. This can be demonstrated by

providing substantial evidence that the existing use is likely to be discontinued during the planning period. (Gov. Code, § 65583.2, subd. (g)(2).)

Specific Plans: The element identifies several specific plan areas to accommodate the City's RHNA and that some of these plans have been entitled for a certain number of units. To utilize residential capacity in Specific Plans, the element must:

- Indicate whether suitable sites have approved or pending projects or are suitable for development in the planning period.
- If projects are approved or pending, describe the status of the project, including any necessary approvals or steps prior to development, development agreements, conditions, or requirements such as phasing or timing requirements that impact development in the planning period, and the affordability of the project's units based on anticipated rents, sales prices, or other mechanisms (e.g., financing, affordability restrictions) ensuring their affordability.
- For suitable sites without pending or approved projects, the element must list sites by parcel number or unique reference, size, general plan designation, zoning and include a calculation of the realistic capacity of each site. The element must also include an analysis of any requirements such as phasing or timing requirements that impact development in the planning period and large sites, if applicable, with policies and programs.

Accessory Dwelling Units (ADU): The element is projecting 128 ADUs for an average of 16 ADUs per year during the planning period to accommodate a portion of its RHNA. The City's Annual Progress Reports (APR) shows no records of ADU permits in 2018 and 2020 and one ADU permitted in 2019. The City's past performance on permitting ADUs do not support a sixteen-fold increase. The element should reconcile these figures and adjust assumptions based on a realistic estimate of the potential for ADUs and include strong policies and programs that commit to incentivizing ADUs. Additionally, while the element can use ADU applications to support projecting ADU production beyond what was actually permitted, it cannot solely rely on ADU applications to make projection assumptions. Depending on the analysis, the element must commit to monitor ADU production and affordability throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element. If necessary, additional actions should be taken in a timely manner (e.g., within six months). The degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

Electronic Sites Inventory: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml for a copy of the form and instructions. The City can reach out

to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Environmental Constraints: While the element includes a general description of various environmental constraints related to earthquakes, fires, and flood, it must describe how these conditions relate to identified sites including any known environmental constraints within the City that could impact housing development in the planning period. (Gov. Code, § 65583.2, subd. (b).) For additional information and sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental.

Zoning for a Variety of Housing Types (Emergency Shelters): While the element identifies the I-P zone for emergency shelters, it should also analyze the suitability and capacity of the I-P zone to meet the need for emergency shelters. For example, the element should identify the number of parcels, typical parcel sizes, available acreage, whether sites are underutilized, and any potential for reusing existing buildings to emergency shelters. The element should also discuss proximity to transit and services and any known hazardous conditions unfit for human habitation.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

   Land-Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking, minimum lot sizes, and open space requirements. Specifically, the element indicates that a minimum of two parking spaces is required and concluded that while parking requirements may be a constraint, developers can receive reductions per density bonus law. However, the element should include programs to address constraints on development regardless of the availability of reductions under density bonus law. Secondly, the R-3 and PRD-A zone requires a minimum lot size of 1 acre, and Foothill Specific Plan and PRD-D requires a minimum lot size of 3-5 acres. The element also states that the PRD-D zone minimum unit size is determined by planning commission. Both provisions appear to be a constraint. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

   Population Density: The element lists densities based on population density per acre as well as dwelling units per acre (p. 3-6). The element must analyze how the

population density requirement is determined for a project, how it interacts with the dwelling unit per acre standard, and weather it acts as a development cap for proposed projects.

Processing and Permit Procedures: While the element included information on the type of permit application and whether a public hearing is required, it should also describe the procedures for a typical single-family and multifamily development. The analysis should address the approval body, the number of public hearings, if any, approval findings, design review requirements and any other relevant information. The analysis should address impacts on housing cost, supply, timing, and approval certainty. Additionally, the element states that a conditional use permit (CUP) is required for multifamily housing of five or more units in multifamily zones (e.g., R-3 zone). The element must specifically analyze the CUP process as a potential constraint on housing supply and affordability. The analysis should identify findings of approval for the CUP and their impact on development approval certainty, timing, and cost. The element must include a program to address and remove or mitigate the CUP requirement.

On/Off-Site Improvements: While the element states that on/off site improvements include curb, gutters, sidewalks, etc., the element should include information on actual standards and typical improvements required. Additionally, it should further identify subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width) and analyze their impact as potential constraints on housing supply and affordability.

Local Ordinances: The element must specifically analyze any locally adopted ordinances such as inclusionary ordinances or short-term rental ordinances that directly impact the cost and supply of residential development.

Constraints on Housing for Persons with Disabilities:

- *Reasonable Accommodation*: The element states that the City's reasonable accommodation approval findings include "impact on surrounding uses." The element should analyze this reasonable accommodation finding for constraints on housing for persons with disabilities and revise programs to address identified constraints.
- *Family Definition*: The element should also describe and analyze any definition of family used in zoning and land use.
- *Residential Care Facilities for Six or fewer and Seven or More Persons:* The element must describe how the City defines and permits group homes of six of fewer and seven or more persons. For your information, group homes with six or fewer should be treated no differently than other by-right single-family housing uses and must be allowed in all residential zones. Additionally, group homes of 7 or more should not be excluded from residential zones or treated differently than other similar uses.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels,*

including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)

Requests for Lower Density, Permit Times, and Efforts to Address Nongovernmental Constraints: The element must analyze (1) requests to develop housing at densities below those identified in the inventory, (2) the length of time between receiving approval for a housing development and submittal of an application for building permits, and (3) any local efforts to address or mitigate nongovernmental constraints such as reduced fees, financing for affordable housing or expedited processes. The analysis should address any hinderances on the construction of a locality's share of the regional housing need and programs should be added or modified as appropriate.

6. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

   Special Needs Households: While the element includes data and a general discussion of housing challenges faced by special needs households, it still must provide an analysis of the existing needs and resources for each special need group including seniors, female headed households, large householders, extremely low-income households (ELI), and persons experiencing homelessness. For example, the element should discuss the existing resources to meet housing needs (availability of shelter beds, number of large units, number of deed restricted units, etc.,), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps

7. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

   While the element includes an inventory of deed-restricted projects and analysis of at-risk units, California Housing Partnership Cooperation lists three affordable projects that were not included in the inventory. The element should include the following projects in the inventory:

   - TELACU Rialto III – 74 assisted units located on 545 Bloomington Avenue
   - Greentree Senior Apartments – 270 assisted units on 245 East First Street

- Park Place – 30 assisted units on 310 West Jackson Street

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

   To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines. For example, several programs list specific implementation actions such as developing marketing materials and revising the zoning code but should also provide a timeline for when that action will end or the frequency of the action (where applicable). The following programs should be revised:

   - Program 2C – Accessory Dwelling Unit Construction
   - Program 2D – Accessory Dwelling Unit Monitoring Program
   - Program 2N – Small Lot Consolidation
   - Program 3C – Preserve and Monitor At-Risk Units
   - Program 4B - Remove Development Constraints
   - Program 4C – Water and Sewer Service Providers
   - Program 4D – Availability of Zoning, Development Standards, and Fees Online

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or

revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

Housing Program 2B – Rezone to Provide Adequate Sites to Accommodate RHNA: While the element includes a program committing the City to rezone sites to address a 6th cycle shortfall, the program must specifically commit to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i). Specifically, the program must commit to:

- permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a CUP, planned unit development permit, or other discretionary review or approval;
- accommodate a minimum of 16 units per site;
- require a minimum density of 16/20 units per acre; and
- at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites:
    - allow 100 percent residential use, and
    - require residential use occupy 50 percent of the total floor area of a mixed-use project.

City-owned Sites: The element identified several city-owned sites to accommodate a portion of the RHNA including parking lot lots for Metrolink stations. The City should consider including a program that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of City-owned sites. Actions could include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance.

Proposed Housing Overlay: The element states that the City is considering implementing an overlay to increase densities and/or allow for residential uses. If the element is proposing an overlay where the underlying zoning allows for nonresidential uses, the element should include a program that commits to sufficient incentives (beyond State Density Bonus Law) to assure the intended residential uses and affordability.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

6. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding A1, the element does not include a complete Assessment of Fair Housing (AFH). Depending on a complete analysis, the element will need to add and revise programs as appropriate.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(8).)

While the element described various efforts to achieve public participation in the preparation of the housing element update, the element should also describe how comments were considered and incorporated into the element.

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SENT VIA EMAIL

May 27, 2022

Siri Champion (schampion@rialtoca.gov)
Paul Gonzalez (pgonzales@rialtoca.gov)
City of Rialto, Community Development Planning Division
150 S. Palm Avenue
Rialto, CA 92376

Re: City of Rialto's Adopted Sixth Cycle Housing Element

Dear Ms. Champion and Mr. Gonzalez,

Inland Counties Legal Services (ICLS) and the Public Interest Law Project (PILP) write to provide comments on the City of Rialto's Sixth Cycle Housing Element adopted on March 8, 2022 (Adopted Element). PILP and ICLS raised many deficiencies in our earlier comments by letter of March 8, 2022, attached for ease of reference. The City submitted its adopted Sixth Cycle Housing Element to the Department of Housing and Community Development (HCD) for review on April 5, 2022, without making further revisions. We now provide supplemental comments to our March 8 letter.

1. The adopted element does not provide an adequate fair housing analysis.

The City's Adopted Element demonstrates ongoing segregation based on its reliance of 3,045 out of 4,585 lower income units within Foothill Boulevard Specific Plan (adopted August 2010), which makes up 66% of the site identified to accommodate the lower-income RHNA. Adopted Element, p. 3-107. Figure 3-23 illustrates that these sites on or near Foothill Boulevard are near the lowest income and most racially concentrated areas of the city. Adopted Element, p. 3-83. Foothill Boulevard has heavy traffic, including truck traffic that causes respiratory problems, noise and more dangerous pedestrian situations for people living near the corridor. More importantly, Foothill Boulevard has areas with the highest percentage of Latinx and low resource neighborhoods in the City of Rialto. Figure 3-24, Adopted Element, p. 3-84. The Tax Credit Allocation Committee (TCAC)/HCD opportunity map identifies two high segregation and poverty census tracts in the center of the City, as indicated in HCD's 12/13/21 review letter. Both segregation and poverty census tracts border Foothill Boulevard. Census tract 06071003510 runs from Linden Avenue to Cactus

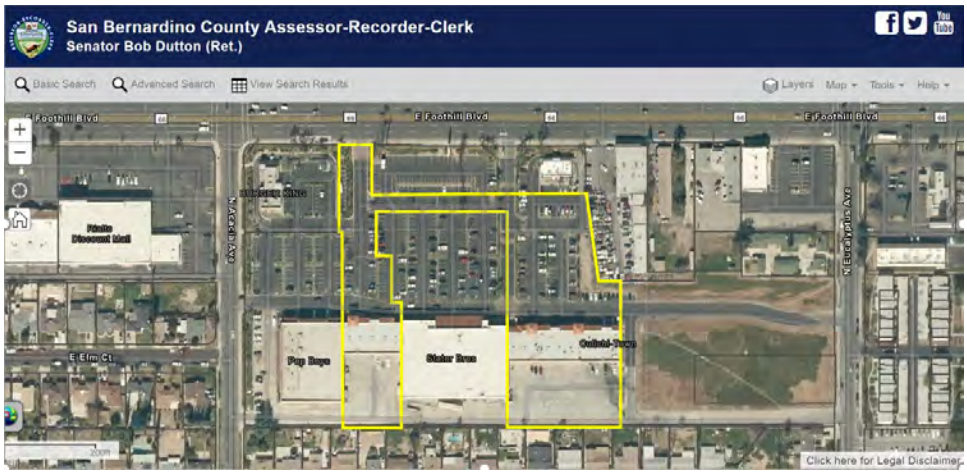
Avenue and census tract 06071003700 runs from Willow Avenue to Sycamore Avenue. The Adopted Element also explains that Census tract 06071003510 is largely made up of industrial and commercial uses with about a quarter of the area made up of a mixture of single-family and multi-family residential. Adopted Element, p. 3-64. Census tract 06071003700, in Downtown Rialto, includes the City Hall, downtown commercial uses, schools, a community center, industrial uses adjacent to the railroad, and some multi-family residences and older single-family residences developed in the mid-1900s. It is also one of the oldest tracts in the City. Adopted Element, p. 3-64. The analysis in the Adopted Element should reflect the fact that the conditions within these two tracts contribute to segregation and poverty and include specific actions on how to transform them into areas of opportunity.

Program 5A: Affirmatively Furthering Fair Housing further demonstrate the lack of analysis required to meet the fair housing analysis because identifies actions that the City will complete until December 2023, including "update, analyze and identify regulations that may have historically contributed to the disparities in access to housing" and "engage community health workers to conduct ground level site visits and meetings within R/ECAP census tracts to better understand resident and business barriers, resources, and needs. Adopted Element, pgs. 4-21 to 4-22.

2. **The adopted element does not identify adequate sites to accommodate the RHNA.**

In addition to assuming that sites will be developed at a maximum allowable density, without adequate justification, a lot of the identified sites within Foothill Boulevard are unrealistic for other reasons. For example, the element identifies non-vacant site numbers 21-25, 27, 28, 34, 51, 56, 64, 65, 67, 76, 77 where the current use is a restaurant, grocery store, or a shopping center, without an explanation of the parking requirements or whether the use will be discontinued. Other nonvacant sites, including site numbers 11, 26, 55, and 95 contain County buildings and parking lots. Moreover, the Adopted Element identifies at least nine sites within one of the two high segregation and poverty census tracts, including site numbers 4, 5, 14, 16, 26, 30, 42, 68, and 70.

The Adopted Element's fails to provide adequate justification and analysis for relying on more than 50 percent of its lower income RHNA on non-vacant sites, especially considering that site numbers 7, 12, 50, and 71 are all non-vacant parcels that are adjacent to vacant lots that are not included in the housing inventory at all. See below stie numbers 7, 12, 50, and 71 respectively. The City has easy options to designate such non-vacant sites for lower-income housing, yet chooses to designate sites with existing uses that are not likely to be available during the planning period.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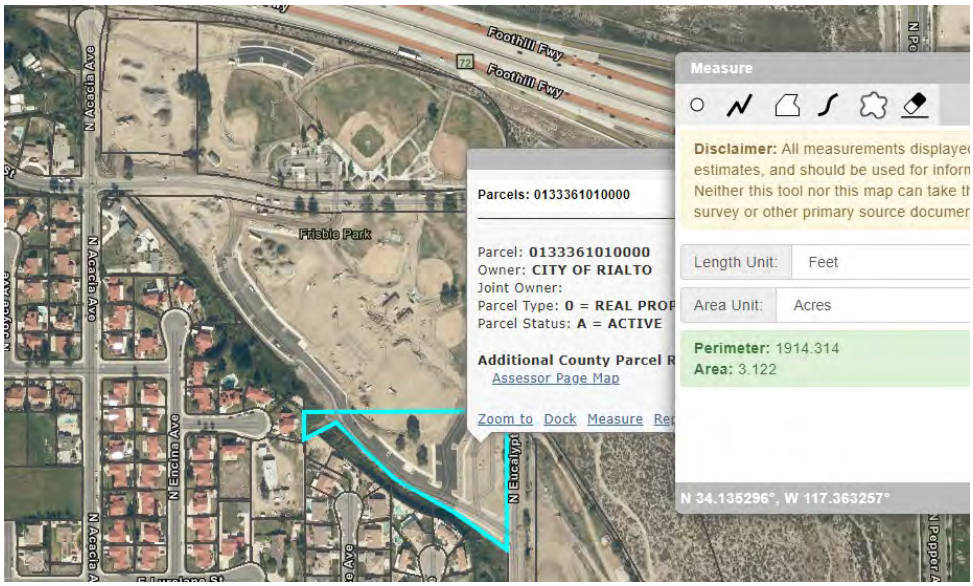
In addition to vacant sites adjacent to non-vacant sites, as described above, other opportunity areas can be found in the Pepper Specific Plan and Lytle Creek Specific Plan. Lytle Creek Specific Plan, north of Foothill Boulevard and the 210 freeway, is a higher resource area. The City can restore better transit options near Lytle Creek to create more opportunities. Also north of Foothill Boulevard, is the Pepper Specific Plan, where it appears there is vacant land to accommodate lower income RHNA. Moreover, adjacent to the Pepper Specific Plan area, the City can look for opportunity areas around Frisbie Park. For example, the City owns a 3-acre parcel (013336101) in the Frisbie Park area, currently used as a parking lot. This site would be a good candidate site to rezone and accommodate lower income RHNA. See site below.

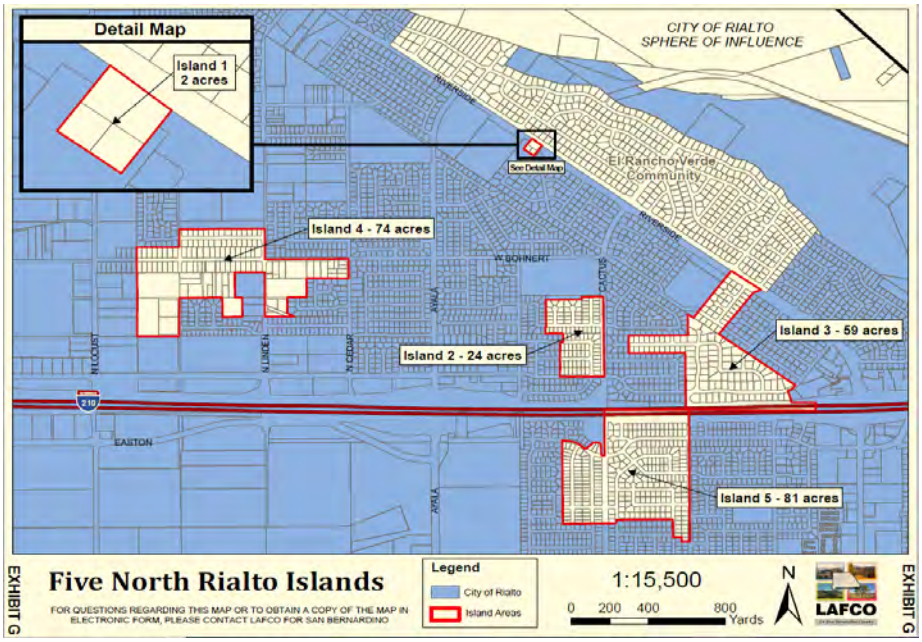


The Adopted Element does not inventory this and other City owned sites, despite the directive of Section 65583.2(a) to include such sites in the inventory, and the suitability of such sites for residential development during the planning period. See our March 8, 2022 letter, p. 6 regarding

the failure to describe the City's intentions to dispose of sites that it owns. Furthermore, Program 2S in the Adopted Element promises to inventory City owned sites does not substitute for the requirement to include such sites in the inventory.

3. **The City should complete its program to annex remaining unincorporated islands within Rialto.**

Without explanation, the City discontinued their commitment from the Fifth Cycle Housing Element Four Year Revision in 2019 (Program 5.2D) to pursue annexation of five out of nine unincorporated islands within the city. See Adopted Element, p. A-12. In the fifth cycle, the City had committed to Local Agency Formation Commission (LAFCO) that it would annex the remaining unincorporated islands from San Bernardino County. LAFCO had conditioned the approval of two neighborhoods within the Lytle Creek Specific Plan on City's annexation of these remaining unincorporated islands. Having committed to annex unincorporated islands from San Bernardino County, the City should complete these actions, which can also provide opportunities to accommodate the lower income RHNA. For example, Island number 4 on the LAFCO map below includes vacant sites that the City could explore further for opportunities.



4. **Public Participation at the City Council Public Hearing.**

The City Council held a public hearing on March 8, 2022 to approve the adoption of the Sixth Cycle Housing Element. The public notice of the March 8 hearing included the option of making public comments via Zoom and provided a Zoom link. ICLS intended to make public oral comments via the zoom link provided. However, city staff informed ICLS the afternoon of the hearing that the zoom link would not be available, and the zoom link in fact did not work during the hearing. Public comments were available in person only, without adequate notice, such that ICLS was unable to provide oral comments in addition to written comments.

Accordingly, we urge the City to correct the deficiencies as described above and in our March 8 letter to come into compliance with Housing Element Law.

Sincerely,

Maria Delgado
Inland Counties Legal Services

Craig Castellanet
Public Interest Law Project

CC: Jose Jauregui; Sohab Mehmood; Paul McDougall

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SENT VIA EMAIL ONLY

February 24, 2023

Siri Champion (schampion@rialtoca.gov)
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

Re: City of Rialto's Draft Sixth Cycle Housing Element dated February 17, 2023

Dear Ms. Champion,

Inland Counties Legal Services, Inc. (ICLS) and the Public Interest Law Project (PILP) write to provide comments on the City of Rialto's Draft Sixth Cycle Housing Element dated February 17, 2023 (February Draft), proposed for adoption on February 28, 2023. PILP and ICLS raised many deficiencies on the Sixth Cycle Housing Element adopted on March 8, 2022 and its substantial revisions in our prior comments by letters of March 8, 2022, May 27, 2022, September 22, 2022, and February 13, 2023. We provide the following supplemental comments based upon our review of the February Draft.

Public Participation

The City made the February Draft available for public review on February 10, 2023, for a period of seven days. The first day of this public review period was on a Friday before a three-day holiday weekend, effectively cutting the public review period to four days. However, pursuant to Government Code Section 65585(b)(1), the City should make this Draft available for 30 days because it is a new Draft with substantial amendments since the adoption of the Housing Element on March 8, 2022. Moreover, as we wrote in our February 13, 2023 letter, **state law requires that the substantial revisions in the February Draft must be heard by the Planning Commission for a recommendation on the adoption of the Housing Element revision, prior to City Council action to adopt it.** Gov. Code Sections 65353, 65354, 65356. The Planning Commission did hold a hearing in February 2022 prior to the last adoption of the City's Housing Element on March 8, 2022, but it has not reviewed or recommended the adoption of this Draft. The February Draft is also incomplete throughout, numerous Tables and Figures added with the label "XX", hindering the ability to review and provide comment. While there

are substantial improvements in this Draft, including new programs to affirmatively further fair housing, **these programs were developed completely without stakeholder input**. Contrary to the recommendation by staff's report for the February 28, 2023 City Council agenda for file #23-197, it is premature to adopt the February Draft.

Duty to Affirmatively Further Fair Housing

The City's duty to affirmatively further fair housing requires an adequate assessment of fair housing, which must include an assessment of " . . . local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk." Gov. Code § 65583(c)(10)(A)(ii). The California Department of Housing and Community Development (HCD) has found repeatedly that the City's fair housing assessment is incomplete. HCD's review has found that the assessment of local data and knowledge, and disproportionate housing needs, including displacement has not been addressed. See June 3, 2022 HCD letter re City of Rialto's 6th Cycle Adopted Housing Element, (6/3/22 HCD letter) and October 3, 2022 HCD Letter re City of Rialto's 6th Cycle Adopted Housing Element, (10/3/22 HCD letter). Moreover, as noted by HCD and in our prior letters, the location of the identified sites to accommodate the lower-income Regional Housing Need Allocation (RHNA) demonstrate that fair housing issues will continue or worsen in those areas. 6/3/22 HCD letter, p. 1. **The February Draft includes new *analysis* of the City's proposed actions, but does not change the City's *proposed actions* to exclusively zone higher density residential developments in areas with higher concentrations of poverty, higher areas of racial and ethnic concentrations, and lower economic opportunity. (See below, pp. 4-6 of these comments.)** The proposal in the February Draft will not further fair housing goals, to the contrary, it will continue and reinforce patterns of segregation in the City.

Local Data and Knowledge and Other Relevant Factors

The assessment of fair housing includes local data and knowledge and other relevant factors, and it should provide actions or programs that not only address, but overcome and undo, the identified fair housing issues. *See* California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance (AFFH Guidance), p. 25 (available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf).

The February Draft now includes information about the City's growing development of major distribution centers in recent years, which aside from providing employment opportunities, increases pollution due to increased trucking routes. February Draft, 3-107. Additionally, the Draft now acknowledges that past zoning and land use practices have resulted in a large industrial footprint. *Id*. According to the February Draft, there are "virtually no residential uses south of the I-10 freeway and a significant portion of land to the north" and "south of the 210 freeway is comprised of industrial uses", which contribute to fragmented residential areas. *Id*. Yet, the only related commitment the City makes related to this issue is to establish a risk assessment toolkit to "[a]ddress negative environmental, neighborhood, housing and health

impacts associated with siting and operation of land uses such as industrial, agricultural, waste storage, freeways, energy production, etc. in disadvantaged communities" by June 2025. February Draft, 4-37. **After completing the required analysis, the February Draft does not include a program to specifically address the high pollution caused by the truck traffic and the fragmented residential areas, but instead proposes to concentrate opportunities for lower income housing development along the Foothill corridor and other areas that are exposed to the high pollution.** Accordingly, the February Draft does not provide meaningful steps to address these issues.

Disproportionate Housing Needs, including Displacement Risk

The February Draft provides additional analysis regarding housing needs of persons experiencing homelessness. At p. 3-29, the February Draft claims that the City's homeless population decreased 60% since 2020, but it does not provide any authority to test the reliability of this assertion or the methodology of the data collection, and does not reconcile with the American Community Survey data on homeless counts cited at p. 2-29. It notoriously difficult to accurately conduct counts of unsheltered people, and regardless, the problems of unsheltered people continues to be a serious issue in the City. February Draft, 3-92. The February Draft acknowledges "potential gaps in support and services," including the need for "low cost, emergency or transitional housing." February Draft, 3-94. The Draft claims to make meaningful changes to Program 2I: Emergency Shelters and Program 2J: Transitional and Supportive Housing, but the only amendments made are to make objectives "to continue to monitor the inventory of sites" and work with the appropriate organizations to meet the needs of the homeless. These planned actions will not make a real world difference to address the identified needs, even the timeframes are supposed annual reviews. Because both the objectives and the timeframes are too vague, the programs do not make a meaningful commitment to address homelessness.

The City identifies I-P zoned sites as the parcels where it permits the siting of emergency shelters as of right. However, the City acknowledges that some of the parcels in the I-P zone region are at or near areas with hazardous waste exposure, see February Draft, p. 3-23 to 3-24: "[t]he census tracts that the I-P zones are located scored between 60 and 80 percentiles for hazardous waste." The City estimates that it saw a 38.3 percent increase in the unhoused population living in the City between 2018 and 2020, see February Draft, p. 2-29, Table 2-29. However, the programs do not address this constraint or identify other areas in the City if the areas in the I-P zone are undevelopable due to hazardous waste exposure, nor does the Draft identify alternate regions in the City where the City would permit emergency shelters by right if the I-P zone ends up being an unsuitable location to site its emergency shelters as required by Government Code sections 65583(c) and 65583.2.

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Furthermore, the amendments in the February Draft at p. B-38 reveal that there is not a defined "minimum density" on residential sites in Rialto, triggering further problems with the rezone program in the inventory, since such standards must be established where there is a shortfall of sites, as here. See Gov. Code sec 65583(c)(1)(A). The inventory cannot comply with the requirements of Government Code section 65583.2(h) to have a minimum density of 20 units per acre and a minimum capacity of 16 units per site. In the R-3 Zone, the City's expression of a "maximum density" of 1 dwelling unit per 2,000 square feet translates into a density of 21.78 units per acre, also insufficient to allow 30 units per acre as required for rezoning to accommodate lower income RHNA in the City of Rialto in a metropolitan county. Gov. Code section 65583.2 (c)(3)(B)(iv). While the City has added language to the Rezone Program 2B to specify a minimum density of 20 units per acre to comply with section 65583.2(h), this program language must be reconciled with the asserted lack of a minimum density in the new narrative in Appendix B.

Parking Constraints

HCD makes findings in its review letters that the City must "go beyond reviewing parking standards and make a make specific commitment to reduce or revise parking requirements and ensure parking requirements do not constrain development," and similarly must address costs impacts of garage requirements in multifamily housing and make specific commitment to address the constraint. 10/3/22 HCD letter, p. 4, and 6/3/22 HCD letter, p. 4, respectively.
The February Draft amends the objectives in Program 4B, but the revised language does not include any terms specific to parking or garages. Instead the revision only makes illusory and vague "commitments" that supposedly "commit to revising or modify development standards that may constrain development." February Draft, 4-22 to 4-23. Without being specific to parking and garage requirements, the program amendments in the Draft do not address, much less cure, the deficiencies in the constraint program identified by HCD. The City does have existing language in the third bullet point of Program 4B to commit to "reduce or revise" parking

standards, particularly for 1 bedroom and studio units, however the City could yet determine that a "revision" of the parking standards does not require any "reduction", so this still lacks a substantive commitment.

Furthermore, while we commend the City for including information on the amended parking requirements within ½ mile of public transit in AB 2097 (2022), and including the new Program 3H, that program includes language to maximize the City's ability to deny the reduced parking standards when implementing the new restrictions on imposing parking requirements. The incomplete statement of the requirements of the new Government Code section 65863.2, which allows local governments to impose minimum parking standards upon making certain findings, should be removed from Program 3H because it does not completely reflect the requirements of the law.

Permit Procedures and Timelines

Since the City's Sixth Cycle Housing Element was adopted in March 2022, it has consistently failed to address permit processing time and procedures. See 10/2/22 HCD letter, p. 4, 6/3/22 HCD letter, p. 4. The February Draft now for the first time describes permit processing times, demonstrating that while single family homes may require "a few days to 4 weeks to process" whereas larger multifamily developments can take "8-20 weeks". February Draft, 3-34. Notably, there are no examples provided with this information, other than the simple assertion from the Draft.

Consistent with responses to previous comments by ICLS and HCD, the February Draft now includes language in Program 4G to address the fact that the City's Zoning Code requires subjective elements in its review of multifamily projects such as being "essential or desirable", the development will "not be detrimental" to general welfare, and "will not be injurious" to nearby properties, that create uncertainties for applicants. February Draft, 3-35. This Zoning Code language is prejudicial to multifamily housing development since it makes implicit assumptions about the nature of housing development. The language in Program 4G does not include sufficient commitment to correct these biases and uncertainties, instead only to "include objective language" but not to remove subjective terms reflecting bias. Program 4G should be strengthened to remove ambiguous subjective terms that can be used to justify the biases included within them to delay or deny projects based on uncertain subjective criteria.

Conditional Use Permits

The February Draft does not make any amendments to respond to the repeated comments from ICLS and HCD regarding conditional use permits that are required for developments of developments for five or more dwelling units in the medium density zone. February Draft p. 3-22, 10/2/22 HCD letter, p. 4, 6/3/22 HCD letter, p. 6. The February Draft continues to simply conclude, without any evidence or analysis, that the CUP requirement is not a constraint on development of "Multiple-Family Dwellings" despite the obvious fact that a completely discretionary review is a serious constraint on housing. By concluding that the CUP does not create a constraint to the development of housing, the City skirts the directive from HCD to either revise or modify the constraints upon the development of multi-family housing in the City.

The City also fails to analyze the length of time between receiving approval for a housing development and submittal of an application for building permits or address any hinderance the CUP presents on the development of housing and include programs as appropriate to address those hinderances. Accordingly, HCD should direct the City to remove the sentence that the CUP does not create a constraint to the development of housing and direct the City to analyze and inform the public on how it will work to remove all constraints, including those imposed by CUPs upon the development of housing in the City.

This constraint is compounded by the fact that the discussion of medium density designations is included in the inventory of sites, for example in the Renaissance Specific Plan area, which includes reliance on such sites portions of the RHNA, but could function to exclude lower income households from the area, which would be inconsistent with the City's obligation to Affirmatively Further Fair Housing throughout the City. February Draft, p. B-6. It is unclear whether the Lytle Creek Specific Plan area is subject to the same CUP requirement, however it is notable that no lower-income RHNA is expected to be accommodated in that area either. February Draft Table B-1, p. B-3.

Multi-family Housing

Finally, HCD also directed the City to review Program 5F: Housing for Persons with Developmental Disabilities. Even though the City has removed the language "should constraints be found," the February Draft does not provide any information about City policies or practices concerning group homes and whether those policies comply with AFFH obligations or are constraining and discriminatory on the basis of disability in violation of federal and state fair housing laws. (See HCD Group Home Technical Advisory, December 2022, pp. 8-12; 12-20). In its February Draft, the City states that 7,085 persons aged 5 to 64 years old are living with disabilities in the City, with another 3,540 persons being older adults living with disabilities (See Table X-X, Draft, p. 3-89). Because there are a significant number of persons living with disabilities and as group homes can provide persons living with disabilities stable housing communities, the City should revise the Draft to discuss and analyze this housing type and inform the public how the City will comply with its AFFH duty regarding group homes in the City.

Conclusion

We provide these comments to urge the City to correct the remaining deficiencies in the City's Draft Sixth Cycle Housing Element before adoption and submission to HCD for review.

Sincerely,

Maria T. Delgado
Inland Counties Legal Services, Inc.

Craig Castellanet
Ugochi Anaebere-Nicholson
Public Interest Law Project

Cc: Jose Jauregui (Jose.Jauregui@hcd.ca.gov)

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SENT VIA EMAIL ONLY

February 24, 2023

Siri Champion (schampion@rialtoca.gov)
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

Re: City of Rialto's Draft Sixth Cycle Housing Element dated February 17, 2023

Dear Ms. Champion,

Inland Counties Legal Services, Inc. (ICLS) and the Public Interest Law Project (PILP) write to provide comments on the City of Rialto's Draft Sixth Cycle Housing Element dated February 17, 2023 (February Draft), proposed for adoption on February 28, 2023. PILP and ICLS raised many deficiencies on the Sixth Cycle Housing Element adopted on March 8, 2022 and its substantial revisions in our prior comments by letters of March 8, 2022, May 27, 2022, September 22, 2022, and February 13, 2023. We provide the following supplemental comments based upon our review of the February Draft.

Public Participation

The City made the February Draft available for public review on February 10, 2023, for a period of seven days. The first day of this public review period was on a Friday before a three-day holiday weekend, effectively cutting the public review period to four days. However, pursuant to Government Code Section 65585(b)(1), the City should make this Draft available for 30 days because it is a new Draft with substantial amendments since the adoption of the Housing Element on March 8, 2022. Moreover, as we wrote in our February 13, 2023 letter, **state law requires that the substantial revisions in the February Draft must be heard by the Planning Commission for a recommendation on the adoption of the Housing Element revision, prior to City Council action to adopt it.** Gov. Code Sections 65353, 65354, 65356. The Planning Commission did hold a hearing in February 2022 prior to the last adoption of the City's Housing Element on March 8, 2022, but it has not reviewed or recommended the adoption of this Draft. The February Draft is also incomplete throughout, numerous Tables and Figures added with the label "XX", hindering the ability to review and provide comment. While there

are substantial improvements in this Draft, including new programs to affirmatively further fair housing, **these programs were developed completely without stakeholder input**. Contrary to the recommendation by staff's report for the February 28, 2023 City Council agenda for file #23-197, it is premature to adopt the February Draft.

Duty to Affirmatively Further Fair Housing

The City's duty to affirmatively further fair housing requires an adequate assessment of fair housing, which must include an assessment of " . . . local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk." Gov. Code § 65583(c)(10)(A)(ii). The California Department of Housing and Community Development (HCD) has found repeatedly that the City's fair housing assessment is incomplete. HCD's review has found that the assessment of local data and knowledge, and disproportionate housing needs, including displacement has not been addressed. See June 3, 2022 HCD letter re City of Rialto's 6th Cycle Adopted Housing Element, (6/3/22 HCD letter) and October 3, 2022 HCD Letter re City of Rialto's 6th Cycle Adopted Housing Element, (10/3/22 HCD letter). Moreover, as noted by HCD and in our prior letters, the location of the identified sites to accommodate the lower-income Regional Housing Need Allocation (RHNA) demonstrate that fair housing issues will continue or worsen in those areas. 6/3/22 HCD letter, p. 1. **The February Draft includes new *analysis* of the City's proposed actions, but does not change the City's *proposed actions* to exclusively zone higher density residential developments in areas with higher concentrations of poverty, higher areas of racial and ethnic concentrations, and lower economic opportunity. (See below, pp. 4-6 of these comments.)** The proposal in the February Draft will not further fair housing goals, to the contrary, it will continue and reinforce patterns of segregation in the City.

Local Data and Knowledge and Other Relevant Factors

The assessment of fair housing includes local data and knowledge and other relevant factors, and it should provide actions or programs that not only address, but overcome and undo, the identified fair housing issues. *See* California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance (AFFH Guidance), p. 25 (available at https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf).

The February Draft now includes information about the City's growing development of major distribution centers in recent years, which aside from providing employment opportunities, increases pollution due to increased trucking routes. February Draft, 3-107. Additionally, the Draft now acknowledges that past zoning and land use practices have resulted in a large industrial footprint. *Id*. According to the February Draft, there are "virtually no residential uses south of the I-10 freeway and a significant portion of land to the north" and "south of the 210 freeway is comprised of industrial uses", which contribute to fragmented residential areas. *Id*. Yet, the only related commitment the City makes related to this issue is to establish a risk assessment toolkit to "[a]ddress negative environmental, neighborhood, housing and health

impacts associated with siting and operation of land uses such as industrial, agricultural, waste storage, freeways, energy production, etc. in disadvantaged communities" by June 2025. February Draft, 4-37. **After completing the required analysis, the February Draft does not include a program to specifically address the high pollution caused by the truck traffic and the fragmented residential areas, but instead proposes to concentrate opportunities for lower income housing development along the Foothill corridor and other areas that are exposed to the high pollution.** Accordingly, the February Draft does not provide meaningful steps to address these issues.

Disproportionate Housing Needs, including Displacement Risk

The February Draft provides additional analysis regarding housing needs of persons experiencing homelessness. At p. 3-29, the February Draft claims that the City's homeless population decreased 60% since 2020, but it does not provide any authority to test the reliability of this assertion or the methodology of the data collection, and does not reconcile with the American Community Survey data on homeless counts cited at p. 2-29. It notoriously difficult to accurately conduct counts of unsheltered people, and regardless, the problems of unsheltered people continues to be a serious issue in the City. February Draft, 3-92. The February Draft acknowledges "potential gaps in support and services," including the need for "low cost, emergency or transitional housing." February Draft, 3-94. The Draft claims to make meaningful changes to Program 2I: Emergency Shelters and Program 2J: Transitional and Supportive Housing, but the only amendments made are to make objectives "to continue to monitor the inventory of sites" and work with the appropriate organizations to meet the needs of the homeless. These planned actions will not make a real world difference to address the identified needs, even the timeframes are supposed annual reviews. Because both the objectives and the timeframes are too vague, the programs do not make a meaningful commitment to address homelessness.

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The February Draft now includes changes in the "Potential Net Unit Yield" column in the inventory, finally responding to long standing comments from ICLS and HCD. See 10/3/22 HCD letter, p. 2-3. However, these amendments are not reflected in the total number of units described in the rezone program at Table 3-42. Instead, it appears that this reduction is only reflected in the revised Table B-1, at p. B3. This demonstrates again that the February Draft is incomplete, not ready for adoption, and has not been sufficiently subject to public review.

The February Draft includes a new narrative that discusses the capacity of sites to claim that the inventory is adequate, by pointing to a "34% buffer in excess of the lower income RHNA" to account for individual variations in built out densities. February Draft, p. B-39. It is unclear whether this references the 34% buffer described in Table 3-42, again which has not been updated to reflect the revised 80% net yield estimate for realistic capacity. The figure appears to be reduced to a 17% buffer in the revisions to Table B-1. The revisions also does not take into account sites relied upon in the inventory already accommodate parking that is required for existing uses, as described in earlier comments by ICLS. See 5/27/22 ICLS letter.

Furthermore, the amendments in the February Draft at p. B-38 reveal that there is not a defined "minimum density" on residential sites in Rialto, triggering further problems with the rezone program in the inventory, since such standards must be established where there is a shortfall of sites, as here. See Gov. Code sec 65583(c)(1)(A). The inventory cannot comply with the requirements of Government Code section 65583.2(h) to have a minimum density of 20 units per acre and a minimum capacity of 16 units per site. In the R-3 Zone, the City's expression of a "maximum density" of 1 dwelling unit per 2,000 square feet translates into a density of 21.78 units per acre, also insufficient to allow 30 units per acre as required for rezoning to accommodate lower income RHNA in the City of Rialto in a metropolitan county. Gov. Code section 65583.2 (c)(3)(B)(iv). While the City has added language to the Rezone Program 2B to specify a minimum density of 20 units per acre to comply with section 65583.2(h), this program language must be reconciled with the asserted lack of a minimum density in the new narrative in Appendix B.

Parking Constraints

HCD makes findings in its review letters that the City must "go beyond reviewing parking standards and make a make specific commitment to reduce or revise parking requirements and ensure parking requirements do not constrain development," and similarly must address costs impacts of garage requirements in multifamily housing and make specific commitment to address the constraint. 10/3/22 HCD letter, p. 4, and 6/3/22 HCD letter, p. 4, respectively.
The February Draft amends the objectives in Program 4B, but the revised language does not include any terms specific to parking or garages. Instead the revision only makes illusory and vague "commitments" that supposedly "commit to revising or modify development standards that may constrain development." February Draft, 4-22 to 4-23. Without being specific to parking and garage requirements, the program amendments in the Draft do not address, much less cure, the deficiencies in the constraint program identified by HCD. The City does have existing language in the third bullet point of Program 4B to commit to "reduce or revise" parking

standards, particularly for 1 bedroom and studio units, however the City could yet determine that a "revision" of the parking standards does not require any "reduction", so this still lacks a substantive commitment.

Furthermore, while we commend the City for including information on the amended parking requirements within ½ mile of public transit in AB 2097 (2022), and including the new Program 3H, that program includes language to maximize the City's ability to deny the reduced parking standards when implementing the new restrictions on imposing parking requirements. The incomplete statement of the requirements of the new Government Code section 65863.2, which allows local governments to impose minimum parking standards upon making certain findings, should be removed from Program 3H because it does not completely reflect the requirements of the law.

Permit Procedures and Timelines

Since the City's Sixth Cycle Housing Element was adopted in March 2022, it has consistently failed to address permit processing time and procedures. See 10/2/22 HCD letter, p. 4, 6/3/22 HCD letter, p. 4. The February Draft now for the first time describes permit processing times, demonstrating that while single family homes may require "a few days to 4 weeks to process" whereas larger multifamily developments can take "8-20 weeks". February Draft, 3-34. Notably, there are no examples provided with this information, other than the simple assertion from the Draft.

Consistent with responses to previous comments by ICLS and HCD, the February Draft now includes language in Program 4G to address the fact that the City's Zoning Code requires subjective elements in its review of multifamily projects such as being "essential or desirable", the development will "not be detrimental" to general welfare, and "will not be injurious" to nearby properties, that create uncertainties for applicants. February Draft, 3-35. This Zoning Code language is prejudicial to multifamily housing development since it makes implicit assumptions about the nature of housing development. The language in Program 4G does not include sufficient commitment to correct these biases and uncertainties, instead only to "include objective language" but not to remove subjective terms reflecting bias. Program 4G should be strengthened to remove ambiguous subjective terms that can be used to justify the biases included within them to delay or deny projects based on uncertain subjective criteria.

Conditional Use Permits

The February Draft does not make any amendments to respond to the repeated comments from ICLS and HCD regarding conditional use permits that are required for developments of developments for five or more dwelling units in the medium density zone. February Draft p. 3-22, 10/2/22 HCD letter, p. 4, 6/3/22 HCD letter, p. 6. The February Draft continues to simply conclude, without any evidence or analysis, that the CUP requirement is not a constraint on development of "Multiple-Family Dwellings" despite the obvious fact that a completely discretionary review is a serious constraint on housing. By concluding that the CUP does not create a constraint to the development of housing, the City skirts the directive from HCD to either revise or modify the constraints upon the development of multi-family housing in the City.

The City also fails to analyze the length of time between receiving approval for a housing development and submittal of an application for building permits or address any hinderance the CUP presents on the development of housing and include programs as appropriate to address those hinderances. Accordingly, HCD should direct the City to remove the sentence that the CUP does not create a constraint to the development of housing and direct the City to analyze and inform the public on how it will work to remove all constraints, including those imposed by CUPs upon the development of housing in the City.

This constraint is compounded by the fact that the discussion of medium density designations is included in the inventory of sites, for example in the Renaissance Specific Plan area, which includes reliance on such sites portions of the RHNA, but could function to exclude lower income households from the area, which would be inconsistent with the City's obligation to Affirmatively Further Fair Housing throughout the City. February Draft, p. B-6. It is unclear whether the Lytle Creek Specific Plan area is subject to the same CUP requirement, however it is notable that no lower-income RHNA is expected to be accommodated in that area either. February Draft Table B-1, p. B-3.

Multi-family Housing

Finally, HCD also directed the City to review Program 5F: Housing for Persons with Developmental Disabilities. Even though the City has removed the language "should constraints be found," the February Draft does not provide any information about City policies or practices concerning group homes and whether those policies comply with AFFH obligations or are constraining and discriminatory on the basis of disability in violation of federal and state fair housing laws. (See HCD Group Home Technical Advisory, December 2022, pp. 8-12; 12-20). In its February Draft, the City states that 7,085 persons aged 5 to 64 years old are living with disabilities in the City, with another 3,540 persons being older adults living with disabilities (See Table X-X, Draft, p. 3-89). Because there are a significant number of persons living with disabilities and as group homes can provide persons living with disabilities stable housing communities, the City should revise the Draft to discuss and analyze this housing type and inform the public how the City will comply with its AFFH duty regarding group homes in the City.

Conclusion

We provide these comments to urge the City to correct the remaining deficiencies in the City's Draft Sixth Cycle Housing Element before adoption and submission to HCD for review.

Sincerely,

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Appendix D

GLOSSARY OF HOUSING TERMS

Glossary of Housing Terms

Above Moderate-Income Household. A household with an annual income usually greater than 120 percent of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of housing and Urban Development (HUD) for the Section 8 Housing Program.

Accessory Dwelling Unit. A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. "Granny Flat" is one type of second unit.

Affirmatively Furthering Fair Housing (AFFH): Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal agencies and federal grantees further the purposes of the Fair Housing Act. AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Apartment. An apartment is one (1) or more rooms in an apartment house or dwelling occupied or intended or designated for occupancy by one (1) family for sleeping or living purposes and containing one (1) kitchen.

Assisted Housing. Generally multi-family rental housing, but sometimes single-family ownership units, whose construction, financing, sales prices, or rents have been subsidized by Federal, State, or local housing programs including, but not limited to Federal Section 8 (new construction, substantial rehabilitation, and loan management set-asides), Federal Sections 213, 236, and 202, Federal Sections 221 (d) (3) (below-market interest rate program), Federal Sections 101 (rent supplement assistance), Community Development Block Grant (CDBG), Farmers Home Administration (FmHA) Sections 515, multi-family mortgage revenue bond programs, local redevelopment and in lieu fee programs, and units developed pursuant to local inclusionary housing and density bonus programs.

Below-Market-Rate (BMR). Any housing unit specifically priced to be sold or rented to low- or moderate-income households for an amount less than the fair-market value of the unit. Both the State of California and the U.S. Department of Housing and Urban Development set standards for determining which households qualify as "low income" or "moderate income." The financing of housing at less than prevailing interest rates.

Build-Out. That level of urban development characterized by full occupancy of all developable sites in accordance with the General Plan; the maximum level of development envisioned by the General Plan.

Build-out does not assume that each parcel is developed to include all floor area or housing units possible under zoning regulations.

Community Development Block Grant (CDBG). A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitled communities and administered by the State Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

Condominium. A structure of two or more units, the interior spaces of which are individually owned; the balance of the property (both land and building) is owned in common by the owners of the individual units. (See "Townhouse.")

Covenants, Conditions, and Restrictions (CC&Rs). A term used to describe restrictive limitations that may be placed on property and its use, and which usually are made a condition of holding title or lease.

Deed. A legal document which affects the transfer of ownership of real estate from the seller to the buyer.

Density Bonus. The allocation of development rights that allow a parcel to accommodate additional square footage or additional residential units beyond the maximum for which the parcel is zoned, usually in exchange for the provision or preservation of an amenity at the same site or at another location.

Density, Residential. The number of permanent residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

Developable Land. Land that is suitable as a location for structures and that can be developed free of hazards to, and without disruption of, or significant impact on, natural resource areas.

Down Payment. Money paid by a buyer from his own funds, as opposed to that portion of the purchase price which is financed.

Duplex. A detached building under single ownership that is designed for occupation as the residence of two families living independently of each other.

Dwelling Unit (DU). A building or portion of a building containing one or more rooms, designed for, or used by one family for living or sleeping purposes, and having a separate bathroom and only one kitchen or kitchenette. See Housing Unit.

Elderly Housing. Typically, one- and two-bedroom apartments or condominiums designed to meet the needs of persons 62 years of age and older or, if more than 150 units, persons 55 years of age and older, and restricted to occupancy by them.

Emergency Shelter. A facility that provides immediate and short-term housing and supplemental services for the homeless. Shelters come in many sizes, but an optimum size is considered to be 20 to 40 beds.

Supplemental services may include food, counseling, and access to other social programs. (See "Homeless" and "Transitional Housing.")

Extremely Low-Income Household. A household with an annual income equal to or less than 30 percent of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

Fair Market Rent. The rent, including utility allowances, determined by the United States Department of Housing and Urban Development for the purpose of administering the Section 8 Program.

Family. (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An Individual or a group of persons living together who constitute a bona fide single-family housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind [Governor's Office of Planning and Research, General Plan Guidelines].

General Plan. A comprehensive, long-term plan mandated by State Planning Law for the physical development of a city or county and any land outside its boundaries which, in its judgment, bears relation to its planning. The plan shall consist of seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. The plan must include a statement of development policies and a diagram or diagrams illustrating the policies.

Goal. A general, overall, and ultimate purpose, aim, or end toward which the City will direct effort.

Green Building. Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition. (US Environmental Protection Agency)

Historic Preservation. The preservation of historically significant structures through restoration and rehabilitation of the building(s) to a former condition.

Historic Property. A historic property is a structure or site that has significant historic, architectural, or cultural value.

Household. All those persons—related or unrelated—who occupy a single housing unit. (See "Family.")

Housing and Community Development, California Department of (HCD). The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low- and moderate-income households.

Housing Element. One of the seven State-mandated elements of a local general plan, it assesses the existing and projected housing needs of all economic segments of the community, identifies potential

sites adequate to provide the amount and kind of housing needed, and contains adopted goals, policies, and implementation programs for the preservation, improvement, and development of housing.

Housing Payment. For ownership housing, this is defined as the mortgage payment, property taxes, insurance, and utilities. For rental housing this is defined as rent and utilities.

Housing Ratio. The ratio of the monthly housing payment to total gross monthly income; also called Payment-to-Income Ratio or Front-End Ratio.

Housing Unit. The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under State law.

Housing and Urban Development, U.S. Department of (HUD). A cabinet-level department of the federal government that administers housing and community development programs.

Implementing Policies. The City's statements of its commitments to consistent actions.

Implementation. Actions, procedures, programs, or techniques that carry out policies.

Infill Development. The development of new housing or other buildings on scattered vacant lots in a built-up area or on new building parcels created by permitted lot splits.

Jobs-Housing Balance. A ratio used to describe the adequacy of the housing supply within a defined area to meet the needs of persons working within the same area. The General Plan uses SCAG's definition which is a job total equal to 1.2 times the number of housing units within the area under consideration.

Land Use Classification. A system for classifying and designating the appropriate use of properties.

Live-Work Units. Buildings or spaces within buildings that are used jointly for commercial and residential purposes where the residential use of the space is secondary or accessory to the primary use as a place of work.

Low-Income Household. A household with an annual income usually no greater than 51 percent to 80 percent of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

Low-income Housing Tax Credits. Tax reductions provided by the federal and State governments for investors in housing for low-income households.

Manufactured Housing. Residential structures that are constructed entirely in the factory, and which since June 15, 1976, have been regulated by the federal Manufactured Home Construction and Safety

Standards Act of 1974 under the administration of the U.S. Department of Housing and Urban Development (HUD). (See "Mobile home" and "Modular Unit.")

Mixed-Use. Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A "single site" may include contiguous properties.

Moderate-Income Household. A household with an annual income usually no greater than 81 percent to 120 percent of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

Monthly Housing Expense. Total principal, interest, taxes, and insurance paid by the borrower on a monthly basis. Used with gross income to determine affordability.

Multiple Family Building. A detached building designed and used exclusively as a dwelling by three or more families occupying separate suites.

No Net Loss. Requires sufficient adequate sites to be available at all times throughout the RHNA planning period to meet a jurisdiction's remaining unmet housing needs for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category.

Ordinance. A law or regulation set forth and adopted by a governmental authority, usually a city or county.

Overcrowded Housing Unit. A housing unit in which the members of the household, or group are prevented from the enjoyment of privacy because of small room size and housing size. The U.S. Bureau of Census defines an overcrowded housing unit as one which is occupied by more than one person per room.

Parcel. A lot or tract of land.

Planning Area. The area directly addressed by the general plan. A city's planning area typically encompasses the City limits and potentially annexable land within its sphere of influence.

Policy. A specific statement of principle or of guiding actions that implies clear commitment but is not mandatory. A general direction that a governmental agency sets to follow, in order to meet its objectives before undertaking an action program. (See "Program.")

Poverty Level. As used by the U.S. Census Bureau, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or "poverty thresholds" varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

Program. An action, activity, or strategy carried out in response to adopted policy to achieve a specific goal or objective. Policies and programs establish the "who," "how" and "when" for carrying out the "what" and "where" of goals and objectives.

Redevelop. To demolish existing buildings; or to increase the overall floor area existing on a property; or both; irrespective of whether a change occurs in land use.

Regional. Pertaining to activities or economies at a scale greater than that of a single jurisdiction and affecting a broad geographic area.

Regional Housing Needs Assessment (RHNA). A quantification by the local council of governments of existing and projected housing need, by household income group, for all localities within a region.

Rehabilitation. The repair, preservation, and/or improvement of substandard housing.

Residential. Land designated in the General Plan and Zoning Code for buildings consisting of dwelling units. May be improved, vacant, or unimproved. (See "Dwelling Unit.")

Residential Care Facility. A facility that provides 24-hour care and supervision to its residents.

Residential, Multiple Family. Usually three or more dwelling units on a single site, which may be in the same or separate buildings.

Residential, Single-Family. A single dwelling unit on a building site.

Retrofit. To add materials and/or devices to an existing building or system to improve its operation, safety, or efficiency. Buildings have been retrofitted to use solar energy and to strengthen their ability to withstand earthquakes, for example.

Rezoning. An amendment to the map to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

Section 8 Rental Assistance Program. A federal (HUD) rent-subsidy program that is one of the main sources of federal housing assistance for low-income households. The program operates by providing "housing assistance payments" to owners, developers, and public housing agencies to make up the difference between the "Fair Market Rent" of a unit (set by HUD) and the household's contribution toward the rent, which is calculated at 30 percent of the household's adjusted gross monthly income (GMI). "Section 8" includes programs for new construction, existing housing, and substantial or moderate housing rehabilitation.

Shared Living Facility. The occupancy of a dwelling unit by persons of more than one family in order to reduce housing expenses and provide social contact, mutual support, and assistance. Shared living facilities serving six or fewer persons are permitted in all residential districts by Section 1566.3 of the California Health and Safety Code.

Single-Family Dwelling, Attached. A dwelling unit occupied or intended for occupancy by only one household that is structurally connected with at least one other such dwelling unit. (See "Townhouse.")

Single-Family Dwelling, Detached. A dwelling unit occupied or intended for occupancy by only one household that is structurally independent from any other such dwelling unit or structure intended for residential or other use. (See "Family.")

Single Room Occupancy (SRO). A single room, typically 80-250 square feet, with a sink and closet, but which requires the occupant to share a communal bathroom, shower, and kitchen.

Subsidize. To assist by payment of a sum of money or by the granting to terms or favors that reduces the need for monetary expenditures. Housing subsidies may take the forms or mortgage interest deductions or tax credits from federal and/or State income taxes, sale or lease at less than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

Substandard Housing. Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

Supportive Housing. Housing with no limit on length of stay, that is occupied by the target population as defined in California Health and Safety Code Section 53260(d), and that is linked to onsite or offsite services that assist 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. "Target population" means adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people. [California Health and Safety Code Sections 50675.14(b) and 53260(d)]

Target Areas. Specifically, designated sections of the community where loans and grants are made to bring about a specific outcome, such as the rehabilitation of housing affordable by Very-Low and Low-income households.

Tax Increment. Additional tax revenues that result from increases in property values within a redevelopment area. State law permits the tax increment to be earmarked for redevelopment purposes but requires at least 20 percent to be used to increase and improve the community's supply of very low- and low-income housing.

Tenure. A housing unit is owner-occupied if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is owner-occupied only if the owner or co-owner lives in it. All other occupied units are classified as renter-occupied including units rented for cash rent and those occupied without payment of cash rent.

Townhouse. A townhouse is a dwelling unit located in a group of three (3) or more attached dwelling units with no dwelling unit located above or below another and with each dwelling unit having its own exterior entrance.

Transitional Housing. Shelter provided to the homeless for an extended period, often as long as 18 months, and generally integrated with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a stable income and permanent housing. (See "Homeless" and "Emergency Shelter.")

Undevelopable. Specific areas where topographic, geologic, and/or superficial soil conditions indicate a significant danger to future occupants and a liability to the City.

Underutilized. Areas in the City that are capable of being developed at a higher density which may include: nonvacant publicly owned surplus or excess land; portions of blighted areas with abandoned or vacant buildings; existing high opportunity developed areas with mixed-used potential; nonvacant substandard or irregular lots that could be consolidated; and any other suitable underutilized land.

Vacant. A vacant site is a site without any houses, offices, buildings, or other significant improvements on it. Improvements are generally defined as development of the land (such as a paved parking lot or income production improvements such as crops, high voltage power lines, oil-wells, etc.) or structures on a property that are permanent and add significantly to the value of the property

Acronyms Used

ACS: American Community Survey
BMPs: Best Management Practices
CALTRANS: California Department of Transportation
CEQA: California Environmental Quality Act
CHAS: Comprehensive Housing Affordability Strategy
CIP: Capital Improvement Program
DDS: Department of Developmental Services
DIF: Development Impact Fee
DU/AC: Dwelling Units Per Acre
EDD: California Employment Development Department
FAR: Floor Area Ratio
FEMA: Federal Emergency Management Agency
HCD: Department of Housing and Community Development
HOA: Homeowners Association
HUD: Department of Housing and Urban Development
LAFCO: Local Agency Formation Commission
MFI: Median Family Income
NPDES: National Pollutant Discharge Elimination System
RTFH: Regional Task Force on the Homeless
RTP: Regional Transportation Plan
SCAG: Southern California Association of Governments
SPA: Sectional Planning Area
STF: Summary Tape File (U.S. Census)
TOD: Transit-Oriented Development
TDM: Transportation Demand Management
TSM: Transportation Systems Management
WCP: Water Conservation Plan